

SEPA ENVIRONMENTAL CHECKLIST

UPDATED 2014

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.

A. Background

1. Name of proposed project, if applicable:

Small Lot Development Standards in DMR zones

2. Name of applicant:

City of Seattle

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

Office of Planning and Community Development
700 5th Avenue, Suite 2000
Seattle, Washington 98104
Contact: Brennon Staley, Strategic Advisor, (206) 684-4625

4. Date checklist prepared:

November 26, 2019

5. Agency requesting checklist:

City of Seattle Office of Planning and Community Development

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

Approval by City Council and Mayor in early 2020.

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.

In addition to the SEPA determination that will be prepared for this proposal, the following documents were prepared that are related to this proposal:

- Downtown Height and Density Draft Environmental Impact Statement, November 2003
- Downtown Height and Density Final Environmental Impact Statement, January 2005
- Mandatory Housing Affordability Transportation Study: Downtown and South Lake Union, April 2016, Fehr & Peers
- Mandatory Housing Affordability Environmental Checklist, May 2016
- City of Seattle Comprehensive Plan Update Environmental Impact Statement, May 2016

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.

A number of pending development proposals are located in the DMR zones.

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

Approval of an ordinance by Seattle City Council.

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.)

This is a non-project proposal. The legislation would address issues relating to construction on small lots in DMR zones located in Belltown. Currently, lot coverage and setback requirements in these zones require complex building forms with floor plates that gradually decrease in size at various heights. While construction is already challenging on small lots, these standards are particularly challenging because they result in complicated construction, challenging floor layouts, and small upper-story floor plates. Advancements in modular and panelized construction are making small lot development more feasible; however, these types of construction require more consistent floor plates to be feasible. The goal of this legislation would be to implement zoning standards that are more appropriate for small lots in order to increase the supply of market-rate and rent-restricted housing.

MINIMUM REQUIREMENTS

Projects meeting the following standards would be allowed to meet a different set of development standards:

- The site is located in a DMR/C 145/75, DMR/R 145/65, DMR/C 280/125, or DMR/R 280/65 zone.
- The site is less than 14,500 square feet in size.
- At least 75% of gross floor area in residential use.

The proposal could also include a requirement that at least 4% of residential units are affordable to households making 60% of AMI for a minimum period of 75 years. Affordable housing provided to meet the requirements of Mandatory Housing Affordability or Multi-Family Tax Exemption may count toward meeting this requirement.

ALTERNATIVE STANDARDS

Projects meeting the minimum standards would be allowed to use the following alternative standards in order to provide more appropriate massing for smaller lots.

Coverage Limits

Currently, on lots less than 19,000 square feet in DMR zones, the first 65 feet in height have no coverage limit, floors between 65 feet and 85 feet have a maximum coverage limit of 75%, and floors above 85 feet and have a coverage limit of 65%. We are proposing to allow the following alternative:

- For lots 8,000 square feet or less, development would have to meet one of the following:
 - the first 25 feet in height would have no coverage limit and all floors above 25 feet in height would have a maximum coverage limit of 80%; or
 - the first 25 feet in height would have no coverage limit and all floors above 25 feet in height would have a maximum coverage limit of 85%, but the development could not exceed 135 feet, excluding rooftop features and any additional height granted by the Living Building Pilot program.
- For lots 14,500 square feet or less but greater than 8,000 square feet, the first 45 feet would have no coverage limit and all floors above 45 feet would have a maximum coverage limit of 75%.

Building Width and Depth

Currently, lots less than 19,000 square feet in DMR zones have a maximum width and depth limit of 90 feet on avenues and 120 feet on east/west streets for portions of a structure above 65 feet in height. We are proposing to allow a maximum width and depth limit of 100 feet on avenues and 120 feet on east/west streets for portions of a structure above 45 feet in height.

Green Street Setbacks

Development on green streets in DMR zones is required to be setback 10 feet from the green street property line between 65 and 85 feet in height, plus an additional foot of setback for each 5 feet above 85 feet. However, buildings frequently get departures from the stepped setback through design review as it results in a strange shape. Variable upper-level setbacks are challenging on small lots because they result in many floor plate changes. This type of development standard is particularly challenging for modular or panelized construction where standard unit sizes would result in the removal of full units on upper stories. The proposed alternative is to require no setback for the first 25 feet and a setback of 10 feet for the remainder of the building. This alternative would only be allowed on the north side of a green street without view corridor requirements to ensure it does not substantially reduce the amount of light accessing the street.

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.

This ordinance would affect DMR/C 145/75, DMR/R 145/65, DMR/C 280/125, and DMR/R 280/65 zones located in the Downtown Urban Center.

B. ENVIRONMENTAL ELEMENTS

1. Earth

- a. General description of the site
(circle one): Flat, rolling, hilly, steep slopes, mountainous,
other _____
- b. What is the steepest slope on the site (approximate percent slope)?
- 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.
- d. Are there surface indications or history of unstable soils in the immediate vicinity? If so, describe.
- 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.
- f. Could erosion occur as a result of clearing, construction, or use? If so, generally describe.
- g. About what percent of the site will be covered with impervious surfaces after project construction (for example, asphalt or buildings)?
- h. Proposed measures to reduce or control erosion, or other impacts to the earth, if any:

Not applicable. This is a non-project action. There is no specific site or project location. No construction is proposed. The affected area contains a diversity of slopes, soils, and fills consistent with urbanized areas.

Compliance with existing city ordinances to reduce or control erosion is required.

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.
- b. Are there any off-site sources of emissions or odor that may affect your proposal? If so, generally describe.
- c. Proposed measures to reduce or control emissions or other impacts to air, if any:

Not applicable. This is a non-project action. There is no specific site or project location. No construction is proposed. The proposal could encourage future residential or mixed-use development which might result in emissions generally consistent with construction, operation, and maintenance in urban areas.

Compliance with existing city ordinances to reduce or control emissions and other impacts to air is required.

3. Water

a. Surface Water:

- 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 yes, describe type and provide names. If appropriate, state what stream or river it flows into.
- 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.
- 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.
- 4) Will the proposal require surface water withdrawals or diversions? Give general description, purpose, and approximate quantities if known.
- 5) Does the proposal lie within a 100-year floodplain? If so, note location on the site plan.
- 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.

Not applicable. This is a non-project action. There is no specific site or project location. No construction is proposed. The affected area does not contain any year-round surface water bodies, but is located near Puget Sound.

b. Ground Water:

- 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.
- 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.

Not applicable. This is a non-project action. There is no specific site or project location. No construction is proposed. The proposal could encourage future residential or mixed-use development which might result in one-time or ongoing ground water withdrawals generally consistent with construction, operation, and maintenance in urban areas.

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.

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

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

Not applicable. This is a non-project action. There is no specific site or project location. No construction is proposed. The proposal could encourage future residential or mixed-use development which might result in water runoff generally consistent with construction, operation, and maintenance in urban areas.

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

Compliance with existing city ordinances to reduce or control surface, ground, or runoff water impacts is required.

4. Plants

a. Check the types of vegetation found on the site:

- ___ deciduous tree: alder, maple, aspen, other
- ___ evergreen tree: fir, cedar, pine, other
- ___ shrubs
- ___ 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
- ___ other types of vegetation

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

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

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

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

Not applicable. This is a non-project action. There is no specific site or project location. No construction is proposed. A variety of vegetation can be found within the affected areas.

5. Animals

a. List any birds and other animals which have been observed on or near the site or are known to be on or near the site. Examples include:

birds: hawk, heron, eagle, songbirds, other:
mammals: deer, bear, elk, beaver, other:
fish: bass, salmon, trout, herring, shellfish, other _____

- b. List any threatened and endangered species known to be on or near the site.
- c. Is the site part of a migration route? If so, explain.
- d. Proposed measures to preserve or enhance wildlife, if any:
- e. List any invasive animal species known to be on or near the site.

Not applicable. This is a non-project action. There is no specific site or project location. No construction is proposed. A variety of animals can be found within the affected areas.

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

Not applicable. This is a non-project action. There is no specific site or project location. No construction is proposed. The proposal could encourage future residential or mixed-use development which might result in additional energy and natural resource use generally consistent with construction, operation, and maintenance in urban areas.

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.
 - 1) Describe any known or possible contamination at the site from present or past uses.
 - 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.
 - 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.
 - 4) Describe special emergency services that might be required.

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

b. Noise

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

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.

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

Not applicable. This is a non-project action. There is no specific site or project location. No construction is proposed. The proposal could encourage future residential or mixed-use development which might result in additional health hazards or noise generally consistent with construction, operation, and maintenance in urban areas.

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.

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? 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:

c. Describe any structures on the site.

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

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

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

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

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

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

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

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

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

m. Proposed measures to ensure the proposal is compatible with nearby agricultural and forest lands of long-term commercial significance, if any:

Not applicable. This is a non-project action. There is no specific site or project location. No construction is proposed. The affected area currently contains DMR/C 145/75, DMR/R 145/65, DMR/C 280/125, and DMR/R 280/65 zones and is located in the Downtown Urban Center. A small portion of the affected area is located in the Urban Harborfront shoreline environment. Advisory mapping generated by the City suggest the affected area may contain some steep slope and liquefaction prone areas. It is a highly urbanized environment consisting of residential, office, retail, institution, park, and other uses.

The proposal could encourage future residential or mixed-use development which might result in the demolition of existing structures.

Compliance with existing city ordinances on zoning and tenant relocation assistance is required.

9. Housing

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

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

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

Not applicable. This is a non-project action. There is no specific site or project location. No construction is proposed. The proposal could encourage future residential or mixed-use development which might result in the demolition of existing structures containing housing units and the creation of new units. As this is a non-project action, it is not feasible to speculate on the number of units that might be provided or eliminated or on the cost of those units.

Compliance with existing city ordinances on housing and tenant relocation assistance is required.

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?

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

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

Not applicable. This is a non-project action. There is no specific site or project location. No construction is proposed. The affected area generally allows buildings with maximum heights of 145 or 280 feet, although the proposal would only affect buildings that are no greater than 145 feet in height. The proposal could encourage future residential or mixed-use development which might result in the alteration or obstruction of existing

views and the creation of new views. The proposal could also change the massing of future buildings slightly to allow more rectilinear forms which may change their aesthetics.

Compliance with existing city ordinances on zoning and design review is required.

11. Light and glare

- a. What type of light or glare will the proposal produce? What time of day would it mainly occur?
- b. Could light or glare from the finished project be a safety hazard or interfere with views?
- c. What existing off-site sources of light or glare may affect your proposal?
- d. Proposed measures to reduce or control light and glare impacts, if any:

Not applicable. This is a non-project action. There is no specific site or project location. No construction is proposed. The proposal could encourage future residential or mixed-use development which might result in the light and glare generally consistent with the construction, operation, and maintenance of buildings in urban areas. The proposal could also change the massing of future buildings slightly to allow more rectilinear forms which might increase or decrease the amount of shading that occurs in different areas.

Compliance with existing city ordinances on construction and design review is required.

12. Recreation

- a. What designated and informal recreational opportunities are in the immediate vicinity?
- b. Would the proposed project displace any existing recreational uses? If so, describe.
- c. Proposed measures to reduce or control impacts on recreation, including recreation opportunities to be provided by the project or applicant, if any:

Not applicable. This is a non-project action. There is no specific site or project location. No construction is proposed. The proposal could encourage future residential or mixed-use development which might result in the removal or creation of recreational opportunities generally consistent with the construction, operation, and maintenance of buildings in urban areas.

Compliance with existing city ordinances on amenity areas is required.

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 located on or near the site? If so, specifically describe.
- 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.

- 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.
- 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.

Not applicable. This is a non-project action. There is no specific site or project location. No construction is proposed. The affected area includes multiple historic structures including: Tillicum Place, Seattle Monorail, Fire Station #2, Franklin Apartments, Windham Apartments, Seattle Labor Temple, New Pacific Apartments, and the Belltown Cottages. The affected area abuts the Downtown Waterfront which is an area that is known to have been historically occupied by Indians. This data was assessed through City of Seattle GIS data.

Compliance with existing city ordinances on historic resources is required.

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.
- 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?
- c. How many additional parking spaces would the completed project or non-project proposal have? How many would the project or proposal eliminate?
- 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).
- e. Will the project or proposal use (or occur in the immediate vicinity of) water, rail, or air transportation? If so, generally describe.
- 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 nonpassenger vehicles). What data or transportation models were used to make these estimates?
- 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.
- h. Proposed measures to reduce or control transportation impacts, if any:

Not applicable. This is a non-project action. There is no specific site or project location. No construction is proposed. The affected area contains and is adjacent to numerous public streets and transit routes. The proposal could encourage future residential or mixed-use development which might result in additional vehicular trips, the removal or creation of additional parking spaces, and impacts to existing infrastructure as generally consistent with the construction, operation, and maintenance of buildings in urban areas.

Compliance with existing city ordinances on parking and transportation infrastructure is required.

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.

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

Not applicable. This is a non-project action. There is no specific site or project location. No construction is proposed. The proposal could encourage future residential or mixed-use development which might result in additional need for public services. The proposal could also include a requirement to include affordable housing.

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.

Not applicable. This is a non-project action. There is no specific site or project location. No construction is proposed. The affected area has access to a variety of utility services.

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:	on file
Name of signee:	Brennon Staley
Position and Agency/Organization:	Strategic Advisor City of Seattle Office of Planning & Community Development
Date Submitted:	12/30/2019

D. Supplemental sheet for nonproject actions

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?

Overall, this non-project proposal would not result in any direct impacts to water, air, toxic or hazardous substances, or noise because it does not directly propose development. In terms of its effects upon future possible development, the proposed changes to development standards could slightly increase development potential in Downtown by authorizing zoning and regulatory changes that would make potential development more feasible and slightly increase the amount of development capacity on small lots. The increment of additional future development that could occur if added development capacity is used could generate minor adverse impacts commonly associated with development in urban areas, such as emissions from automobile trips and heating in new buildings, and incidental contributions to environmental noise and stormwater runoff. The increment of difference in impacts, compared to development under today's regulations, would be only that amount attributable to the buildings being incrementally more feasible or bigger.

Construction activities associated with the increment of additional future development are not likely to generate substantially different adverse impacts on water or air quality under the proposed zoning changes. The proposed changes in lot coverage and setback requirements would allow for incremental increases in building intensity, scale, and duration of construction activity for a given development project, but these would make only a minor difference in the total potential for emissions to air, noise and release of toxic or hazardous substances. Any development or redevelopment will have to comply with City regulations for management of stormwater runoff and other construction practices and requirements.

Any incremental increase in greenhouse gas emissions resulting from additional development in the Downtown could be offset at least partially by reductions in commuting over future buildings' lifetimes as more residents and employees would be able to live and work in these centrally located urban centers. It is not possible to reliably quantify these offsetting factors for comparative purposes, but they would factor into estimations of the net change in greenhouse gas emissions resulting from this proposal.

Proposed measures to avoid or reduce such increases are: None proposed.

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

The Downtown Urban Center is highly urbanized and central portions of Seattle. There are vegetated portions of properties intermittently present within these areas, and various wildlife habituated to urban areas, such as squirrels and birds, are present. To the extent these areas also include urbanized shoreline areas (Puget Sound, Lake Union), these also provide habitat value for birds, fish and other marine life. This non-project proposal would result in no direct impacts to plants, animals, fish, or marine life because it does not directly propose development. The proposal could indirectly affect the potential for impacts to plants, animals, fish, or marine life because additional development resulting from the increase in development capacity in Downtown might slightly affect these habitats. The nature of such adverse impacts from different levels of future development could relate to factors such as higher buildings affecting birds' use of the area, or adding slightly to traffic related deposits of pollutants on local streets, or theoretically leading to higher stormwater flows ultimately released from the affected properties. However, the actual potential for these theorized differences could be affected by the nature of drainage controls and similar features on development sites, which could essentially neutralize or minimize the potential for greater adverse impacts. Similarly, while deposition of pollutants on local streets from traffic could lead to incrementally worsened

water quality in marine areas, it is also possible that long-term trends toward greater mass transit use could lead to future conditions where automobile traffic per capita generated by area residents or employees could be held in check or even reduced.

Proposed measures to protect or conserve plants, animals, fish, or marine life are: None proposed.

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

The proposed changes would result in no direct negative impacts to energy or natural resources because it does not directly propose development. The proposed additional development capacity could result in incrementally larger residential buildings that, in some cases, could result in incrementally higher energy use for a particular project. The differential levels of impacts given potential increments in future development would be small. New buildings will continue to be required to comply with the Seattle Energy Code and other standards for energy efficiency. Additionally, to the extent that additional development capacity results in an increase in the number of housing units and commercial floor area in Downtown, the proposal may in certain cases reduce demand for energy and natural resources by increasing residential and commercial density in an area with frequent transit service and a mix of land uses, increasing the likelihood that people will walk and use transit for work and other daily trips.

Proposed measures to protect or conserve energy and natural resources are: None proposed.

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 proposed zoning changes would not affect the types of construction or uses allowed in Downtown and would only incrementally increase the potential size of future development on a range of redevelopable properties. The proposal would also not alter existing regulations for development in environmentally critical areas contained in Chapter 25.09 of the Seattle Municipal Code, which includes regulations for wetlands and flood-prone areas. There are no wilderness areas, wild and scenic rivers, threatened or endangered species habitat, or prime farmlands in the area where the proposal would apply. However, it is noted that species such as bald eagles and salmon are known to inhabit the general vicinities near the affected area, which adds a degree of interest in preserving water quality from degradation.

There are no historic districts in the projects area. This proposal would not modify existing protections for historic landmarks. Known existing historic landmarks would not be substantially more likely to be developed under this proposal. Potential landmarks, which have been inventoried by the City, could in some case be redeveloped, but would first be evaluated in order to determine whether they should receive a landmark designation.

The location of sites containing archaeological and cultural resources are not known, but might be present in portions of this study area in or near current or historic shoreline areas. The proposal would not modify existing protections for these resources and is not likely to substantially increase the number of sites that would be redeveloped. Rather, it could enable future buildings that are slightly taller or bulkier than would be the case if developed under today's regulations. Future possible development projects in these areas would continue to be subject to the requirements of the Shoreline Master Program, State Environmental Policy Act (SEPA) Historic Preservation Policy and other state laws for potential historic or cultural sites, as applicable.

Proposed measures to protect such resources or to avoid or reduce impacts are: None proposed.

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 direct impacts to land and shoreline use as it is a non-project action. Furthermore, the proposal would not modify the types of uses that are allowed in the affected areas. The proposal could encourage more residential or mixed-use development relative to other uses as it only applies to residential or mixed-use development. The proposal could also make an incremental difference in the massing of future development. These changes could allow slightly larger buildings than could be allowed under existing zoning due to modified lot coverage standards. Changes to lot coverage could increase potential FAR on single lots by about 0.2 and on double lots by about 0.1. The City of Seattle's Development Capacity Model identified about 13 single lots and about 11 double lots in the project area that were considered redevelopable. If all of these lots were redeveloped, the increase in lot coverage could result in an additional 31,000 square feet of housing or about additional 34 housing units.

Additionally, allowing a more rectilinear zoning envelope could encourage redevelopment by reducing the complexity of construction, supporting modular or panelized construction, or reducing small upper-story floor plates. While there have been multiple examples of recent redevelopment of double lot parcels in this area, there has not been many examples of redevelopment on single lot parcels. If all 13 single lot parcels were to redevelop, it could result in as much as 980,000 square feet of new development or about 980 new housing units.

Potential changes in massing are shown in the Belltown Small Lot Development Modeling Examples document.

Housing

This proposal is intended to implement new regulations that would make it easier to construct housing on small lots. New development in these zones would be required to contribute to affordable housing through Mandatory Housing Affordability requirement. Analysis contained in many documents related to this proposal as well as the Housing Appendix of the Comprehensive Plan demonstrates that there is a substantial unmet and growing need for market-rate and affordable housing in the City.

Adverse impacts on existing housing could occur if the proposal results in an increase in demolition of existing buildings in order to develop new market-rate buildings. Overall, the proposal is not likely to substantially increase demolition since it is only resulting in minor changes in development capacity on small lots. Moreover, some of the developments using the extra capacity provided under the proposal will be residential developments, and under Mandatory Housing Affordability requirements both residential and commercial developments would generate affordable housing units, which would offset or partially offset the impact of any housing units demolished through redevelopment.

Use and Development Patterns

The majority of land in area is already developed with structures which are unlikely to be redeveloped over the next 20 years. The action would primarily result in different massing for residential structures which are already the preferred use in the area.

Height, Bulk, and Scale

The proposal could result in changes to the massing of future development in certain DMR zones. Overall, the height, bulk and scale of development projects allowed under this proposal would continue to be reasonably compatible with the general character of development anticipated by the goals and policies set

forth in the Seattle Comprehensive Plan. The visual impact of reduced lot coverage and setback above 65 feet would be at least partially offset by increased coverage and setbacks between 25 and 65 feet where they would have a larger effect on pedestrians and other users of the right of way. Overall, the massing of new structures would be consistent with other development in the area and adjacent zones.

Public View Protection

Impacts to public view corridors are not likely to occur as the proposal would not increase height limits and would only apply to projects with height limits of 145 feet.

Shadows on Open Space

Incremental increases in the shading of public places and the right-of-way could occur as a result of the alternative massing allowed under the proposed zoning changes. Some areas that would not be shaded by a lower or narrower structure could be shaded as a result of this proposal. The shading impact of reduced lot coverage and setback above 65 feet would be at least partially offset by increased coverage and setbacks between 25 and 65 feet where they would have a larger effect on the right of way. As the proposal would only result in incrementally small changes to existing development standards, potential impacts are likely to be minor. Because buildings are already allowed to be 145 feet in height and we are not proposing to change the height limits, changes in the amount of light reaching the street would be minor.

Light and Glare

The increased amount of buildings could increase the cumulative level of artificial illumination in the project area. The new buildings may potentially incorporate reflective surfaces that could on occasion create glare impacts. As the proposal would not change the materials that could be used on individual buildings, potential impacts are likely to be minor.

Optional Affordable Housing Requirement

There is an option that the final proposal could include a requirement that properties using the alternative standards must provide affordable rental units on site. This requirement would tend to reduce the overall impacts of the proposal as fewer developments would use the alternative standards due to the cost of providing affordable units on-site. It could also have minor impacts on the location and amount of affordable housing generated overall as new development would tend to use the on-site performance option of Mandatory Housing Affordability rather than the payment option. These impacts would be minor as both options are intended to generate a similar amount of affordable housing and Downtown is already a preferred area for using payment revenue.

Proposed measures to avoid or reduce shoreline and land use impacts are: production of new affordable housing through Mandatory Housing Affordability.

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

Analysis of transportation, public services, and utilities has been conducted as part of the 2035 Comprehensive Plan Update and the implementation of Mandatory Housing Affordability. This action is not expected to substantially change the range of potential outcomes considered as part of these analyses.

The City's pedestrian and bicycle network is expected to provide enough capacity for the growth projected under past actions. Moreover, the City has identified robust plans to improve the pedestrian and bicycle network through its Pedestrian Master Plan and Bicycle Master Plan. These plans are actively being implemented and are expected to continue to be implemented regardless of which land use alternative goes

forward. The pedestrian and bicycle environment is expected to provide sufficient capacity for expected growth as well as become more robust.

There are currently some locations in the study area where on-street parking demand exceeds parking supply. This proposal could increase the competition for on-street parking by allowing additional development capacity or encouraging development on small lots where it may be more difficult to accommodate off-street parking. While there may be short-term on-street parking shortages as individual developments are completed, it is expected that over the long term, parking supply and demand would reach a new equilibrium as drivers shift to other modes or to using off-street parking facilities in response to the City's ongoing on-street parking management program. The on-street parking supply is a relatively small fraction of total supply and off-street parking in downtown.

Water, sewer, drainage, and electrical utility systems are likely to be adequate to serve future demand levels. While some site-specific improvements may be needed, these improvements will be identified at the time of the future development. New development projects in this area could be required to perform analysis of development-related impacts on utility system infrastructure and, where necessary, to construct improvements that increase capacity and avoid service degradation. New development will also be required to provide storm water control and meet energy efficiency standards as required under the Drainage and Energy Codes.

Impacts to other public services, including fire and police services, parks, and schools, are also expected to be minor. Demand for fire and police services are influenced by a number of factors including the number of service requests received and overall response times. While overall demand is not directly correlated with population and job growth, it is likely that additional population and job growth will result in some increase in demand for fire police services. The Police and Fire Departments regularly reassess their staff and facility needs to ensure they are appropriate given expected demand.

Similarly, school enrollment is driven by a diversity of factors that are indirectly related to population and job growth. Service and facility needs are regularly reviewed to ensure they are appropriate given expected demand. Given the small number of children currently enrolled in public school and living in the project area as well as the ability of the School District to modify enrollment boundaries to deal with small changes in enrollment, it is not expected that his proposal will substantially affect school services.

The project area is served numerous park, green street and open space features that serve current employees and residents, and is gaining more plazas and similar spaces as new development occurs. However, despite the range of available facilities, the existing inventory falls short of meeting certain aspirational goals for per capita amounts and distribution within the Downtown Urban Center. These goals are expressed by Seattle Parks and Recreation plans for the purpose of understanding relative spatial distribution and sizing needs for future possible park and open space improvements. Seattle Parks and Recreation will continue planning the implementation of improvements citywide, which may include facilities that would help address identified geographical gaps or shortfalls in recreational facilities in this affected area. It should also be noted that the City's current Comprehensive Plan (as of May 2016) expresses a conclusion that "The City currently provides a good citywide system of libraries, parks and recreation facilities which are available and accessible for use by all the City's residents...While additions to these facilities would enhance the City's quality of life, such additions are not necessary to accommodate new households." This suggests that recreational needs are not expected to be satisfied exclusively by facilities located in a person's neighborhood, which diminishes the relevance of meeting per capita and geographic distributions as the primary measure of sufficiency.

Analysis of impact potential for this proposal acknowledges the existing context that includes geographic and

per capita shortfalls in meeting aspirational parks and open space goals, as currently expressed. The proposal could add to resident and employee populations in an area evaluated as underserved by parks and open space. But because of the relatively limited magnitude of change (compared to total populations in these areas), a degree of uncertainty about the timing and degree of full usage of the added development capability, and the non-binding aspirational qualities of the goals, such impacts would be minor.

Proposed measures to reduce or respond to such demand(s) are: None proposed.

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

The proposal is believed to avoid conflicts with local, state, and federal laws and requirements for protection of the environment.

The City's Comprehensive Plan includes multiple goals and policies directing the creation of both market-rate and affordable housing in Downtown as well as other goals related to urban design, historic preservation, transportation, utilities, and the environment . This proposal seeks to balance and accomplish many of these objectives.