

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.

Instructions for applicants: [\[help\]](#)

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: [\[help\]](#)

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.

A. background [\[help\]](#)

1. Name of proposed project, if applicable: [\[help\]](#)

Amendments to the Land Use Code, Seattle Municipal Code Title 23, to authorize the Director of the Seattle Department of Construction and Inspections (SDCI) to grant additional height and density beyond zone maximums for new development in the Downtown Office Core 2 (DOC2) zone in exchange for voluntary separation from existing residential towers.

2. Name of applicant: [\[help\]](#)

Seattle City Council
City Hall
600 4th Avenue, 2nd Floor
P.O. Box 34025
Seattle, Wa 98124-4025

3. Address and phone number of applicant and contact person: [\[help\]](#)

Seattle City Council
City Hall
600 4th Avenue, 2nd Floor
P.O. Box 34025
Seattle, Wa 98124-4025

Contact: Ketil Freeman, (206) 684-8178, ketil.freeman@seattle.gov

4. Date checklist prepared: [\[help\]](#)

May 24, 2017

5. Agency requesting checklist: [\[help\]](#)

City of Seattle Office of Planning and Community Development / Seattle City Council

6. Proposed timing or schedule (including phasing, if applicable): [\[help\]](#)

The proposed code amendments will be reviewed by the Seattle City Council and considered at a public hearing in the summer of 2017.

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

No, the proposal is a non-project action that is not dependent upon any further action.

8. List any environmental information you know about that has been prepared, or will be prepared, directly related to this proposal. [\[help\]](#)

This SEPA environmental checklist has been prepared for this proposal. Documents related to this proposal are available online at: <http://www.seattle.gov/council/committees/planning-land-use-and-zoning>.

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. [\[help\]](#)

This is a non-project action. The proposal's effect would apply to new development in the DOC2 zone of downtown Seattle. Projects going through the permitting process could opt-in to the proposed development regulation. However, they would not be compelled to do so.

10. List any government approvals or permits that will be needed for your proposal, if known. [\[help\]](#)

The proposed amendments require approval by City Council and concurrence by the Mayor. No other agency approvals are anticipated.

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.) [\[help\]](#)

This is a non-project legislative action proposing amendments to the Land Use Code, Seattle Municipal Code Title 23, to authorize the SDCI Director to grant additional height and density beyond zone maximums for new development in the zone in exchange for voluntary setbacks from existing residential towers.

The proposal is intended to provide a regulatory incentive for developers of new towers, which are proposed for blocks in the DOC2 zone where there is an existing residential tower, to provide a voluntary separation from existing towers. The voluntary separation is intended to increase penetration of light and air to existing residential towers and reduce conflicts between uses in adjacent towers. Proposed separation distances exceed separations that might otherwise be required to comply with Seattle Building Code fire separation standards.

The proposed voluntary separation distances would require that a developer relocate floor area. The proposed additional height for residential development or commercial density would allow a developer to achieve the same floor area that might otherwise be available without the voluntary setback, plus a small floor area incentive to encourage developers to provide the separation. That incentive represents additional height or commercial density above zoned maximums equal to approximately 1.22 square feet of additional floor area for every one square foot of separation area.

The Council established its intent to consider the proposal through Section 46 of Ordinance 125291.

The proposed amendments would:

- Where new residential towers are proposed adjacent to existing residential towers, authorize the SDCI Director to increase the maximum height of residential uses from 550 feet to 640 feet;
- Where new commercial towers are proposed adjacent to existing residential towers, authorize the SDCI Director to increase the maximum commercial Floor Area Ratio (FAR) from 15 to 15.33;
- Above a height of 85 feet, require new residential or commercial towers to set back from existing residential towers by at least 15 feet, if a lot with an existing residential tower is across an alley from the new residential or commercial tower, or at least 30 feet if a lot with an existing residential tower abuts a lot with the new residential or commercial tower; and
- Establish that the decision by the SDCI director to grant additional height is a Type I decision, meaning that it is a non-discretionary decision by the SDCI Director that is not subject to appeal to the City Hearing Examiner.

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. [\[help\]](#)

This is a non-project action. The proposed amendment to the Land Use Code would only apply to new development in the DOC2 zone that voluntarily provides the required additional separation between towers.

The DOC2 zone and potential sites where additional height or density available through the proposal could be sought are shown in Figure 1, below. Sites shown in pink are potential redevelopment sites.

Figure 1. – Redevelopable parcels in DOC2



Source: MHA Urban Design Study, June 2016. City of Seattle Office of Planning and Community Development. Page 12

B. ENVIRONMENTAL ELEMENTS [\[help\]](#)

****THIS IS A NON-PROJECT PROPOSAL WITH NO PARTICULAR DEVELOPMENT SITE. THIS SECTION IS LEFT BLANK PURSUANT TO WAC 197-11-315(1)(e). POTENTIAL IMPACTS ARE DISCUSSED AND DISCLOSED IN SECTION D.**

1. Earth

a. General description of the site [\[help\]](#)

(circle one): Flat, rolling, hilly, steep slopes, mountainous,
other _____

b. What is the steepest slope on the site (approximate percent slope)? [\[help\]](#)

- 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. [\[help\]](#)
- d. Are there surface indications or history of unstable soils in the immediate vicinity? If so, describe. [\[help\]](#)
- 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. [\[help\]](#)
- f. Could erosion occur as a result of clearing, construction, or use? If so, generally describe. [\[help\]](#)
- g. About what percent of the site will be covered with impervious surfaces after project construction (for example, asphalt or buildings)? [\[help\]](#)
- h. Proposed measures to reduce or control erosion, or other impacts to the earth, if any: [\[help\]](#)

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

3. Water

- a. Surface Water: [\[help\]](#)
 - 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. [\[help\]](#)
 - 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. [\[help\]](#)
 - 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. [\[help\]](#)
 - 4) Will the proposal require surface water withdrawals or diversions? Give general description, purpose, and approximate quantities if known. [\[help\]](#)
 - 5) Does the proposal lie within a 100-year floodplain? If so, note location on the site plan. [\[help\]](#)

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. [\[help\]](#)

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. [\[help\]](#)
- 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. [\[help\]](#)

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. [\[help\]](#)
- 2) Could waste materials enter ground or surface waters? If so, generally describe. [\[help\]](#)
- 3) Does the proposal alter or otherwise affect drainage patterns in the vicinity of the site? If so, describe.

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

4. **Plants** [\[help\]](#)

a. Check the types of vegetation found on the site: [\[help\]](#)

- 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? [\[help\]](#)

- c. List threatened and endangered species known to be on or near the site. [\[help\]](#)
- d. Proposed landscaping, use of native plants, or other measures to preserve or enhance vegetation on the site, if any: [\[help\]](#)
- e. List all noxious weeds and invasive species known to be on or near the site.

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: [\[help\]](#)

birds: hawk, heron, eagle, songbirds, other: crows, pigeons, starlings, gulls and other urban tolerant birds

mammals: deer, bear, elk, beaver, other: squirrels, rodents, raccoon, household pets, and other similar mammals tolerant to urban environments

fish: bass, salmon, trout, herring, shellfish, other _____

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

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. [\[help\]](#)
- b. Would your project affect the potential use of solar energy by adjacent properties? If so, generally describe. [\[help\]](#)
- 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: [\[help\]](#)

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. [\[help\]](#)
 - 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)? [\[help\]](#)

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. [\[help\]](#)

3) Proposed measures to reduce or control noise impacts, if any: [\[help\]](#)

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. [\[help\]](#)

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? [\[help\]](#)

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:

c. Describe any structures on the site. [\[help\]](#)

d. Will any structures be demolished? If so, what? [\[help\]](#)

e. What is the current zoning classification of the site? [\[help\]](#)

f. What is the current comprehensive plan designation of the site? [\[help\]](#)

g. If applicable, what is the current shoreline master program designation of the site? [\[help\]](#)

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

i. Approximately how many people would reside or work in the completed project? [\[help\]](#)

- j. Approximately how many people would the completed project displace? [\[help\]](#)
- k. Proposed measures to avoid or reduce displacement impacts, if any: [\[help\]](#)
- l. Proposed measures to ensure the proposal is compatible with existing and projected land uses and plans, if any: [\[help\]](#)

None proposed, other than the processes undertaken to develop legislation that is consistent with City policy. See the response to Questions #D.5 and #D.7 later in this checklist for discussion of compatibility of the proposed legislation with existing and projected land uses and plans.

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

9. Housing

- a. Approximately how many units would be provided, if any? Indicate whether high, middle, or low-income housing. [\[help\]](#)
- b. Approximately how many units, if any, would be eliminated? Indicate whether high, middle, or low-income housing. [\[help\]](#)
- c. Proposed measures to reduce or control housing impacts, if any: [\[help\]](#)

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? [\[help\]](#)
- b. What views in the immediate vicinity would be altered or obstructed? [\[help\]](#)
- c. Proposed measures to reduce or control aesthetic impacts, if any: [\[help\]](#)

11. Light and glare

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

12. Recreation

- a. What designated and informal recreational opportunities are in the immediate vicinity? [\[help\]](#)
- b. Would the proposed project displace any existing recreational uses? If so, describe. [\[help\]](#)

- c. Proposed measures to reduce or control impacts on recreation, including recreation opportunities to be provided by the project or applicant, if any: [\[help\]](#)

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. [\[help\]](#)
- 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. [\[help\]](#)
- 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. [\[help\]](#)
- 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.

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. [\[help\]](#)
- 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? [\[help\]](#)
- c. How many additional parking spaces would the completed project or non-project proposal have? How many would the project or proposal eliminate? [\[help\]](#)
- 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). [\[help\]](#)
- e. Will the project or proposal use (or occur in the immediate vicinity of) water, rail, or air transportation? If so, generally describe. [\[help\]](#)
- 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? [\[help\]](#)
- 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: [\[help\]](#)

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. [\[help\]](#)
- b. Proposed measures to reduce or control direct impacts on public services, if any. [\[help\]](#)

16. **Utilities**

- a. Circle utilities currently available at the site: [\[help\]](#)
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. [\[help\]](#)

C. Signature [\[HELP\]](#)

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 _____ Ketil Freeman, AICP _____
Position and Agency/Organization _____ Supervising Legislative Analyst, City Council Central Staff _____
Date Submitted: _____ May 24, 2017 _____

D. supplemental sheet for nonproject actions [\[help\]](#)

The analysis in this section is based upon the analyses done for the proposal to implement the Mandatory Housing Affordability (MHA) Program in parts of the Downtown and South Lake Union Urban Centers, which was enacted by Ordinance 125291 in April, 2017. Through that proposal the City indicated its intent to consider regulations authorizing voluntary increased tower separations between existing residential structures and new residential and commercial development in the DOC 2 zone.

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 would very slightly increase development potential in DOC2 zone, by authorizing zoning and regulatory changes that would add incrementally to the maximum buildable density and height of future buildings. 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 bigger. No significant adverse impacts in the

form of discharge to water; emissions to air; production, storage, or release of toxic or hazardous substances; or production of noise are identified as likely due to this proposal.

Construction activities associated with the increment of additional future development are not likely to generate significantly different adverse impacts on water or air quality under the proposed zoning changes. The proposed increases in allowable height and FAR 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 – due to slightly longer construction timeframes. 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 DOC2 zone 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 the DOC2 zoned area. 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 DOC2 zone is a highly urbanized portion of Seattle. There are vegetated portions of properties intermittently present within this area, and various wildlife habituated to urban areas, such as squirrels and birds, are present. This non-project proposal would result in no direct impacts to plants or animals because it does not directly propose development. The proposal could indirectly affect the potential for impacts to plants or animals because marginal additional development resulting from the increase in development capacity in the DOC2 zone 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. No significant adverse impacts to plants, animals, fish, or marine life are likely as a result of this proposal.

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, and are not likely to indirectly cause significant adverse depletion of energy or natural resources. The proposed additional development capacity could result in incrementally larger residential or commercial 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 are not likely to be significant. 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 the DOC2 zone, 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?

Overall, this proposal is not likely to result in significant adverse environmental impacts to environmentally sensitive areas or areas designated for government protection. The proposed zoning changes would not affect the types of construction or uses allowed in the DOC2 zone and would only incrementally increase the potential size of future development on a small 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.

This proposal is not likely to generate significant adverse impact on historic landmarks or historic districts as it would not modify existing protections for historic landmarks and contributing structures in historic districts and is not likely to significantly increase the number of sites that would be redeveloped. Known existing historic landmarks would not be 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. Increases in development capacity requiring use of incentives, such as transfer of development rights from Landmark structures, could result in the transfer of additional development rights from these properties and further reduce the likelihood of redevelopment.

This proposal is not likely to generate significant adverse impacts on sites containing archaeological and cultural resources. Such resources' locations are not known, but might be present in portions of this study area. The proposal would not modify existing protections for these resources and is not likely to significantly 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 State Environmental Policy Act (SEPA) Historic Preservation Policy and other state laws for potential archaeologically significant 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 would make an incremental difference in the height/bulk/scale of future development.

Housing

This proposal would incrementally add to the floor area subject to the Mandatory Housing Affordability (MHA) Program contained in Seattle Municipal Code Chapters 23.58.B and 23.58.C. Those program require that new development provide affordable housing (performance) or make a payment in-lieu of providing housing (payment). In the DOC2 zone, performance and payment amounts for commercial and residential development are shown in Table 1, below:

Table 1	Performance	Payment
Commercial Development	8.6% / s.f.	\$14.25 / s.f.
Residential Development	4.0% of all residential units	\$10.25 / s.f.

Analysis contained in the Housing Appendix of the Comprehensive Plan demonstrates that there is a substantial unmet and growing need for affordable housing in the City.

From the standpoint of addressing the need for affordable housing, the impact of this proposal could be positive.

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 or affordable housing generated through payments received under the MHA program. Overall, the proposal is not likely to increase demolition, as the additional development capacity is more likely to result in larger buildings (e.g., taller structures or larger floorplates) than in entirely new buildings. Moreover, some of the developments using the extra capacity provided under the proposal will be residential developments, and under the proposal both residential and commercial developments would generate affordable housing units or money for affordable housing units, which would offset or partially offset the impact of any housing units demolished through redevelopment.

Height, Bulk, and Scale

The proposal could result in changes to the height, bulk, and scale of future development in the DOC 2 zone. The proposal would allow the SDCI Director to incrementally increase the maximum height for residential towers in exchange for increased voluntary separations between towers. Consequently, it is possible that some future development in the DOC zone would result in some taller residential buildings. Similarly, the Director could also authorize incremental increases in commercial Floor Area Ratio (FAR) in exchange for voluntary separations between towers, which could result in slightly taller and bulkier commercial development.

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 regarding Land Use Categories and the adopted land use regulations for the area in which they are located.

There are presently a number of situations in which, under existing regulations, towers can be located relatively close to each other, including the DOC2 zone where no tower separation regulations exist. In some circumstances, towers can already be located as little as 10 feet (or closer if there are no windows) from other towers on adjacent property, or as little as 20 feet across an alley. The proposal allows opportunities for developers to voluntarily mitigate potential adverse effects as experienced by building users from building proximity and loss of privacy by voluntarily providing a separation greater than would otherwise be required by construction codes.

New development that could elect to achieve additional height or density under the proposal would also be subject to design review, which will also help to minimize the potential future impacts.

Public View Protection

Minor adverse impacts to certain SEPA-protected views could occur because the proposed zoning changes could result in taller and/or larger structures than allowed under current regulations. Section 25.05.675 of the Seattle Municipal Code identifies certain public views that should be considered including views of the Space Needle from multiple points such as Myrtle Edwards, the Sculpture Park, and various points in West Seattle; views of Mount Rainier, the Olympic and Cascade Mountains, and Puget Sound from public areas including Plymouth Pillars Park (formerly known as Four Columns Park/Boren-Pine-Pike Park), Harborview Hospital Viewpoint, Kobe Terrace Park and the publicly owned portions of the International District Community Garden, Myrtle Edwards Park, Victor Steinbrueck (Market) Park, Volunteer Park, and Waterfront Park; and certain scenic corridors.

Minor adverse impacts on views to the Space Needle could occur where taller or wider buildings are allowed. Existing development standards, in combination with topography, would already allow for the development of buildings that could obscure the view of the space needle from most areas within the area of study with the exception of views through public rights-of-way. This proposal could incrementally impact views. Overall, these impacts are likely to be minor as the proposal would not modify setbacks on public rights-of-way where the most significant views occur.

Minor adverse impact on views of Mount Rainier, the Olympic and Cascade Mountains, and Puget Sound could also occur where taller or wider buildings are allowed.

Views through Downtown and Denny Triangle from Plymouth Pillars Park (formerly known as Four Columns Park/Boren-Pine-Pike Park) could be affected by the proposal. Views from this park are already substantially blocked by existing development. The incremental additional of height or width on future towers would not substantially change this existing situation.

Shadows on Open Space

Incremental increases in the shading of public places and the right-of-way could occur as a result of taller, wider, and/or bulkier buildings 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. As the proposal would only result in incrementally small changes to existing development standards, potential impacts are likely to be minor.

Light and Glare

The increased size of buildings could increase the cumulative level of artificial illumination Downtown. New buildings will include towers that may potentially incorporate reflective surfaces that could on occasion create glare impacts. The exposure may extend to adjacent hillsides and the freeway. As the proposal would not change the materials that could be used on individual buildings, potential impacts are likely to be minor.

Proposed measures to avoid or reduce shoreline and land use impacts are: production of new affordable housing in Seattle and the opportunity for voluntary increased separations between existing residential towers and future commercial and residential towers on the same block.

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

Overall, this proposal is not likely to result in significant adverse impacts in the form of increased demands on transportation or public services and utilities.

The Mandatory Housing Affordability Transportation Study for Downtown and South Lake Union produced by Fehr & Peers evaluated the expected transportation effects that could occur with the additional housing and employment growth in the Downtown and South Lake Union areas. This study analyzed the 2035 Preferred Alternative included in Seattle's Comprehensive Plan EIS as the No Action Alternative (representing future traffic and land use conditions under expected growth levels without any changes to heights or densities) and a 2035 "With Action" condition, representing future traffic and land use conditions with increased employment and population resulting from increased building heights and densities. The 2035 MHA Proposal evaluated an additional 1,250 housing units and 2,570 jobs in the study area compared to the No Action scenario. The study analyzed the following key indicators:

- Corridor travel time to evaluate auto level of service (LOS)
- Transit route load factors (ratio of riders to number of seats on a bus)
- Screenline vehicle volume-to-capacity ratios, which is the City's existing LOS standard
- Drive alone mode share, which is the City's proposed new LOS standard

Qualitative evaluations of pedestrian, bicycle, freight, parking and safety conditions were also completed.

Overall, the MHA Transportation study found that while the potential incremental increase in growth resulting from the MHA program would add trips to all modes, the difference in effects on the transportation system would be minimal when compared to the No Action Alternative. Therefore, this study found no significant unavoidable adverse impacts to the transportation system as a result of the MHA program's implementation in Downtown and South Lake Union.

Because the proposal incrementally increases the potential for future development on a limited number of sites in the DOC2 zone, which were included in the area analyzed by Fehr & Peers, the proposal similarly is anticipated to have no significant unavoidable adverse impacts to the transportation system.

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.