What's changed since the DEIS?

New information and other corrections and revisions since issuance of the DEIS are described in cross-out (for deleted text) and underline (for new text) format. Entirely new sections or exhibits may be identified by a sidebar callout instead of underline.

3.3 AESTHETICS.

This section focuses on potential changes to physical land use patterns, height, bulk and scale of potential development and implications for land use compatibility that could occur if the City implements MHA rezones.

3.3.1 AFFECTED ENVIRONMENT

This section addresses the existing development character and urban form in Seattle, including building height, bulk, and scale. The section also describes the existing regulations that influence the aesthetics of new development. This review provides a baseline for analyzing the impacts of the alternatives citywide and in urban villages.

DEVELOPMENT, HEIGHT, SCALE, AND CHARACTER

As described in Section 3.2 Land Use, Future Land Use Map (FLUM) designations, zoning, and development regulations govern development in Seattle. Development regulations determine permitted uses and the physical form new buildings, including height and setbacks, which influences urban character. This section describes existing regulations that influence the design and scale of urban development and the City's Design Review process.

City of Seattle

The height, bulk, scale, and character of development vary considerably across Seattle. Seattle's zoning regulations include limits on building height, density, floor area ratio (FAR), and lot coverage and minimum setbacks. These qualities all contribute to the overall intensity of development in a given location.

Development intensity describes the extent to which a site is used and the magnitude of development; even among similar land uses, intensity can vary based on design factors. Building height and FAR limits are two important regulations that directly influence how intense a development appears. FAR is the ratio of a building's floor area to the size of its lot. For most Seattle zones, the City has established both a maximum allowed height and a maximum allowed FAR. The relationship between building height and FAR serves as a shorthand for assessing the "bulkiness" of a building. For example, a tall building with a low FAR will occupy less of its building site and appear less "bulky" (although taller) than a relatively short building with a higher FAR, even though both may contain the same volume. Which form is preferable or perceived as more attractive is partly subjective but also depends on the surrounding context. Taller buildings are a common development form that use urban land more efficiently.

Exhibit 3.3–1 identifies maximum allowed building heights in Seattle, providing a general representation of where higher development intensities are allowed under current development regulations. Buildings in most of Seattle are limited to relatively low heights (30–40 feet) and considered lowrise development. Midrise development (roughly 4–7 stories in height) and highrise development is allowed primarily in urban centers and urban villages.

Urban Centers, Urban Villages, and Manufacturing/Industrial Centers

Urban Centers

Exhibit 3.3–1 shows that Downtown and South Lake Union have greater maximum building heights than the other four urban centers. Maximum heights in Downtown are up to 440 feet in north Downtown and unlimited in the commercial core. Maximum FAR is generally less 3.0 in Belltown and along the waterfront but 20.0 in the commercial core. Portions of Pioneer Square have comparatively low height limits but no limit on FAR. In South Lake Union, maximum heights range from 55 to 440 feet, and maximum FAR limits reach 7.0.

Zoning in the First Hill–Capitol Hill, University District, Northgate, and Uptown Urban Centers allows less intensive development. Maximum heights are predominantly 160 feet or lower, and the maximum allowed FAR ranges from 3.0 to 8.0. The Highrise Multifamily zone in First Hill–Capitol Hill allows buildings up to 300 feet in height.

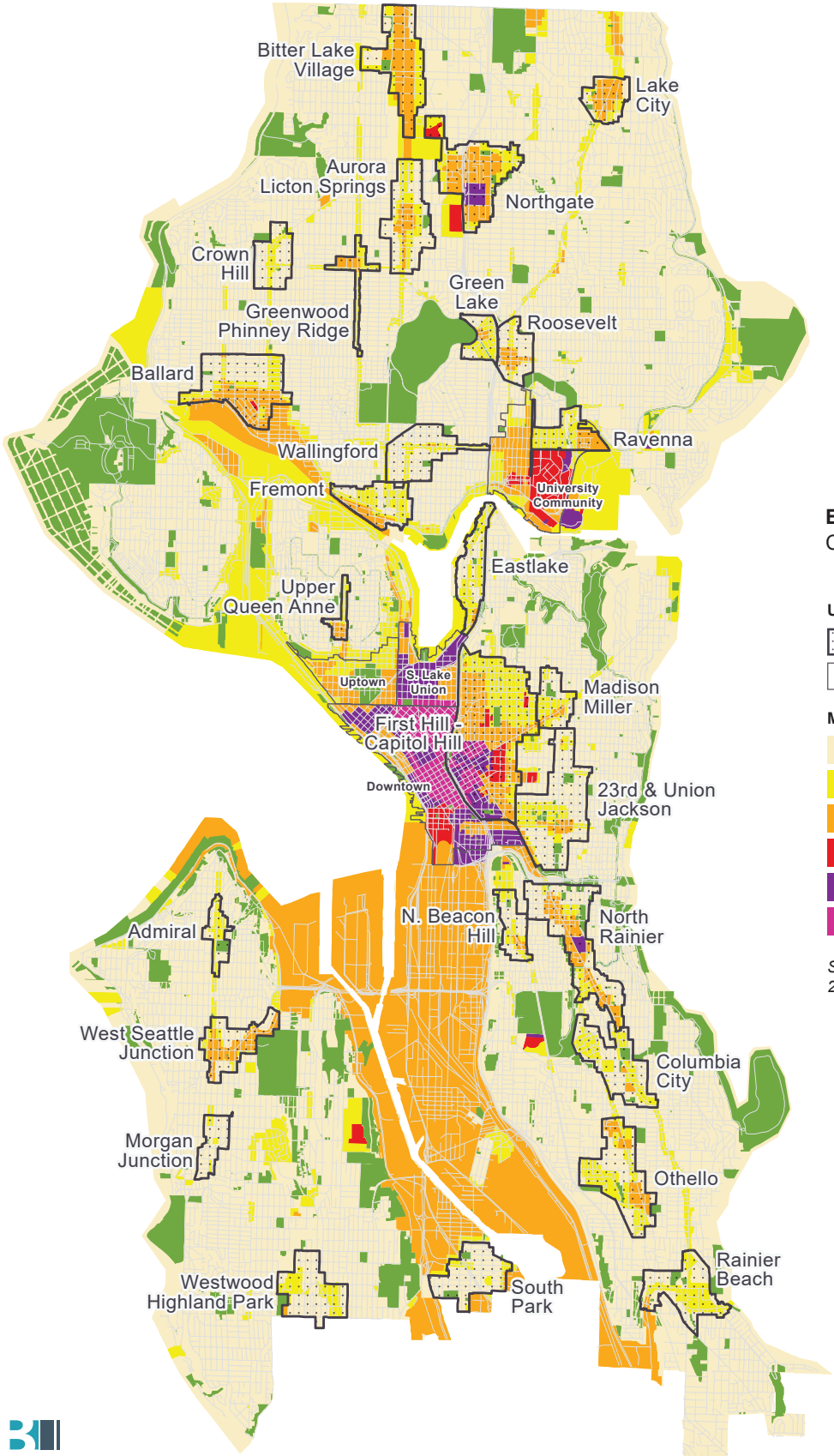

Exhibit 3.3–1
Citywide Allowed Height

Urban Centers/Villages

- In MHA Study Area
- Outside MHA Study Area

Maximum Zoning Heights (Feet)

- ≤ 30
- 31 – 50
- 51 – 85
- 86 – 120
- 121 – 240
- > 240

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

Urban Villages

Many urban villages are predominantly residential in terms of land use and character and organized around a compact commercial/mixed-use node or corridor. The size, mix, and intensity of buildings in these nodes vary among different categories of urban villages. As shown in Exhibit 3.3–1, maximum height limits inside and immediately surrounding urban villages are often similar. But there are exceptions. In Bitter Lake, Lake City, and Greenwood–Phinney Ridge, for example, zoning is predominantly commercial, mixed-use, and multifamily residential where maximum FAR limits are 3.0 or greater.

URBAN FORM

The study area is extensive, encompassing more than 3,000 acres in locations throughout Seattle. Because physical form varies widely across this area, a comprehensive summary is not possible. However, since the proposed action primarily concerns infill development of new buildings in already-developed neighborhoods, documenting common built form conditions provides a baseline for analyzing the proposal's aesthetic impacts. The following examples describe common physical forms that exist in locations the proposal would affect.

Exhibit 3.3–2 Established Single Family Housing Areas

Established single-family areas are common in portions of the study area currently zoned Single Family Residential in urban villages and in proposed urban village expansion areas. Most single-family areas in Seattle have an established pattern of single-family homes, and the ages of the existing housing stock often spans several decades. A typical block often has many homes with an age of 50 years or older. Single-family areas also exhibit a range of home sizes, with many older one- and two-story homes smaller than allowed zoning envelope for new single-family development. Front yards with setbacks of 10–15 feet, often planted with grass or other vegetation, characterize many single-family area.

Exhibit 3.3–3 New Infill Single Family Housing

Existing regulations allow construction of new single-family homes in established single-family areas in the study area. New single-family homes often replace existing older single-family homes, and many exceed the scale of older homes nearby. Compared to older housing stock, modern designs with markedly different architectural characteristics typify many new single-family homes. The City does not require new single-family development to go through Design Review. Infill single-family home development would continue under existing regulations with or without implementation of the proposed action.

Exhibit 3.3–4 Lowrise Multifamily Infill Housing Areas

The study area includes lowrise multifamily areas in urban villages and elsewhere. Due to a mix of existing single-family homes, older multifamily structures, and recently built small multifamily structures characterized these areas, various building heights, scales, and architectural styles characterize these areas. Townhouse development exhibiting neo-craftsman designs was common in the 1990s. Following changes to multifamily development standards in 2010, infill lowrise multifamily housing commonly included townhouses, rowhouses, and small apartment buildings. Recently, development in Lowrise zones has trended towards modern, geometrical styles. Most buildings in these areas are three stories or less.

Exhibit 3.3–5 Mixed Use Commercial Corridors

Most urban villages in the study area include mixed-use commercial corridors, often at the center of an urban village coinciding with a neighborhood business district. Mixed-use commercial corridors also exist along major roadways in urban villages and elsewhere.

Various old and new structures characterize mixed-use commercial corridors. Many structures built in the 1980s and earlier are one-story. Many commercial structures built before the 1950s feature storefronts built to the sidewalk edge, with display windows and pedestrian-oriented entrances.

The study area also includes structures oriented to automobiles with street-facing parking lots and other auto-oriented features. These structures were common in the 1950s through the 1970s.

Development of four- to seven-story buildings has predominated in mixed-use corridors since 1990. These buildings typically include several stories of housing above one story of street-facing commercial uses.

A few corridors in the study area have a consistent pattern of recent mixed-use development for several blocks along both sides of an arterial roadway..

DESIGN REVIEW

Seattle's Design Review Program evaluates the appearance of new buildings and their relationship to adjacent sites. The program reviews most new multifamily, commercial and mixed used development projects in Seattle. Design Review of larger proposed development is conducted primarily by Seattle Department of Construction and Inspections (SDCI) planners with recommendations from neighborhood-based citizen-volunteer boards and public input. Design Review considers issues such as:

- Building and site design, including exterior materials, open space, and landscaping.
- The proposal's relationship to adjacent building, open space, and the street frontage.
- The proposal's relationship to unusual aspects of the site, like views or slopes.
- Pedestrian and vehicular access.

Large proposals required to undergo Design Review must receive a Design Review Board recommendation showing that it meets Design Review guidelines before approval for a Master Use Permit (MUP) and a building permit. For smaller projects, SDCI planners review the proposal

Exhibit 3.3–6 Thresholds for Design Review

ZONE	THRESHOLD WHEN DESIGN REVIEW IS REQUIRED
Design Review Board	
Lowrise 3 (LR3)	More than 8 dwelling units
Midrise (MR) & Highrise (HR)	More than 20 dwelling units
Neighborhood Commercial (NC1, NC2, NC3)	More than 4 dwelling units or 4,000 ft² of nonresidential gross floor area
Commercial (C1, C2)	More than 4 dwelling units or 12,000 ft² of nonresidential gross floor area, located on a lot in an urban center or urban village, or on a lot that abuts or is across a street or alley from a lot zoned single family, or on a lot located in the area bounded by: NE 95th St, NE 145th St, 15th Ave NE, and Lake Washington
All zones Congregate residences and residential uses in which more than 50% of dwelling units are small efficiency dwelling units.	Developments containing 20,000 ft² or more of gross floor
Streamlined Administrative Design Review (SDR)	
All Zones	Development with three (3) or more Townhouse units
All Multi-family and Commercial Zones	If removal of an exceptional tree is proposed and the project falls below Design Review thresholds
All zones Congregate residences and residential uses in which more than 50% of dwelling units are small efficiency dwelling units.	Developments of at least 5,000 but less than 12,000 ft² of gross floor area
Administrative Design Review (ADR)	
All zones Congregate residences and residential uses in which more than 50% of dwelling units are small efficiency dwelling units.	Developments containing at least 12,000 but less than 20,000 ft² of gross floor

Source: BERK, 2017.

to ensure that it meets the Design Review guidelines before approving a MUP and a building permit. Design Review thus ensures aesthetic considerations are addressed at the time new buildings are permitted.

Currently, different thresholds of development trigger three types of design review, as summarized in Exhibit 3.3–6 above. Design Review will continue to be required with or without the proposed action.

~~However, SDCI is in the process of amending the Design Review process in response to a recommendation in the 2015 HALA Action Plan.~~ In October of 2017, City Council passed Ordinance 125429 making amendments to the design review program. The amendments ~~SDCI is considering would~~ set thresholds for Design Review based on a project's gross floor area, rather than the number of residential units proposed. Compared to current regulations, the new regulations would result in slightly lower thresholds in Midrise, Highrise, and some Commercial zones and higher thresholds in Lowrise zones.

New to the FEIS

FEIS Exhibit 3.3–7 is new since issuance of the DEIS

~~As of this writing, the proposed amendments~~ The design review process improvements will become effective in July of 2018. ~~have not been approved, but it is possible that f~~Future planned development in the study area would take place under the revised Design Review process. Design Review thresholds as amended by Ordinance 12549 are summarized in Exhibit 3.3–7.

Exhibit 3.3–7 Thresholds for Design Review

GENERALIZED ZONES	THRESHOLDS	TYPE OF DR
Site Contain Complex Characteristics (Context, Scale, or Special Features)		
Multifamily and Commercial Zones Outside of Downtown (LR, MR, HR, NC, C, SM)	Less than 8,000	No design review (1) (2)
	At least 8,000 but less than 35,000	Administrative design review
	35,000 or greater	Full design review
Site Does not Contain Complex Characteristics		
Multifamily and Commercial Zones Outside of Downtown (LR, MR, HR, NC, C, SM)	Less than 8,000	No design review (1) (2)
	At least 8,000 but less than 15,000	Streamlined design review
	At least 15,000 but less than 35,000	Administrative design review
	35,000 or greater	Full design review
Specific Uses		
Living Building Pilot Program	Any	Full
Affordable Housing	Any	Administrative
K-12 Schools and Religious Facilities	Any	None

(1) Development of at least 5,000 square feet but less than 8,000 square feet is subject to streamlined design review, if the lot was rezoned from a Single-family zone to a Lowrise 1 (LR1) or Lowrise 2 (LR2) zone within 5 years of the design review process improvements.

(2) Development of at least 5,000 square feet but less than 8,000 square feet is subject to administrative design review, if the lot was rezoned from a Single-family zone to a Lowrise 3 (LR3) zone, or any Midrise (MR), Highrise (HR), or Commercial (C/NC) zone within 5 years of the design review process improvements.

Source: BERK, 2017.

~~Currently~~Previously, new development in portions of the study area proposed for ~~Residential Small Lot,~~ Lowrise 1, or Lowrise 2 zoning in the Action Alternatives would not be required to undergo Design Review unless the development exceeds the thresholds described in Exhibit 3.3–6. Under the new design review thresholds, developments over 8,000 square feet in those zones would be required to undergo design review. However, development projects containing more than 5,000 square feet that are rezoned from single family within 5 years of the design review process improvements would be required to undergo design review. This measure is related to MHA, as it would extend design review to lower project sizes for any areas rezoned from single family in order to implement MHA. Other relevant aspects of the design review process improvements include additional requirements for developers to conduct

early community engagement with stakeholders about project proposals. The new Design Review thresholds are considered in the analysis of potential impacts in this FEIS.

DESIGN GUIDELINES

The Design Review process evaluates new development according to citywide and neighborhood design guidelines. SDCI planners evaluate proposals for consistency with Design Review guidelines adopted by the City Council. The citywide design guidelines apply to all projects subject to Design Review everywhere but Downtown, which has its own guidelines. Many Seattle neighborhoods also have neighborhood design guidelines, which work in tandem with the citywide guidelines. Applicants with projects located in such a neighborhood must consult both citywide and neighborhood design guidelines in the development and review of the project design. If conflicting, neighborhood-specific guidelines supersede citywide guidelines. Neighborhood-specific guidelines identify priority design issues and seek to ensure that new development is compatible with specific local neighborhood character. 14 of the 27 urban villages in the study area have adopted neighborhood design guidelines as shown in Exhibit 3.3–8 ~~at right~~.

Exhibit 3.3–8 Urban Villages with Neighborhood Design Guidelines

Urban Village	Neighborhood Design Guidelines	Urban Village	Neighborhood Design Guidelines
23rd & Union-Jackson	No	**Morgan Junction**	Yes
Admiral	Yes	**North Beacon Hill**	Yes
Aurora-Licton Springs	No	**North Rainier**	No
Ballard	Yes	**Northgate**	Yes
Bitter Lake Village	No	**Othello**	Yes
Columbia City	No (guidelines apply in the Historic District)	**Rainier Beach**	No
Crown Hill	No	**Ravenna**	No
Eastlake	No	**Roosevelt**	Yes
First Hill-Capitol Hill	Yes—Capitol Hill, Pike/Pine No—First Hill	**South Park**	No
Fremont	No	**Upper Queen Anne**	Yes
Green Lake	Yes	**Wallingford**	Yes
Greenwood-Phinney Ridge	Yes	**West Seattle Junction**	Yes
Lake City	Yes	**Westwood-Highland Park**	No
Madison-Miller	No		

Source: BERK, 2017.

PROTECTED VIEWS

Seattle's Comprehensive Plan and Land Use Code establish policies and regulations for the protection of public views of important landmarks and natural features, views from specific designated viewpoints in the city, and scenic qualities along mapped scenic routes. The following sections provide an overview of relevant policies and regulations.

Comprehensive Plan Goals and Policies

The Land Use Element of the Comprehensive Plan establishes the importance of public view preservation:

Policy LU 5.15 Address view protection through:

- Zoning that considers views, with special emphasis on shoreline views;
- Development standards that help to reduce impacts on views, including height, bulk, scale, and view corridor provisions, as well as design review guidelines; and
- Environmental policies that protect specified public views, including views of mountains, major bodies of water, designated landmarks, and the Downtown skyline.

The Land Use Element also encourages the protection of views through policies related to building height limits, minimization of building bulk and the creation of access to views and waterways.

Seattle Municipal Code

Seattle Municipal Code (SMC) 25.05.675.P.2 establishes environmental review policies for public view protection, specifically:

> *"It is the City's policy to protect public views of significant natural and human-made features: Mount Rainier, the Olympic and Cascade Mountains, the downtown skyline, and major bodies of water including Puget Sound, Lake Washington, Lake Union and the Ship Canal, from public places consisting of… [a lengthy list of] specified viewpoints, parks, scenic routes, and view corridors…"*

In Downtown, upper-level building setbacks are required for new buildings to protect view corridors along the following streets (SMC 23.49.024):

- Broad St, Clay St, Vine St, Wall St, Battery St, and Bell St west of 1st Ave.
- University St, Seneca St, Spring St, Madison St, and Marion St west of 3rd Ave.

While the Comprehensive Plan and SMC establish the importance of public view corridors and public view preservation, development regulations don't set precise requirements for individual development projects. Protection of public views is deferred to consideration during project reviews and the Design Review process. Attachment 1 to SMC 25.05.675 lists the public views that should be considered for protection during project level review under SEPA. Many of the identified sites are within the study area. Similar consideration of the public view would be given under all alternatives. The Comprehensive Plan and land use code do not establish protection for private views, though the Design Review process may consider impacts to private views.

3.3.2 IMPACTS

This section describes the potential impacts of the ~~three~~ alternatives to aesthetic character in the study area. The ~~Draft~~ EIS recognizes that the evaluation of aesthetic impacts is subjective and can vary depending on an individual's perspectives and preferences. Given the large scale of the study area, impacts to aesthetics and urban design are primarily discussed in a qualitative and generalized manner. Because MHA is a broadly defined, citywide program, this EIS does not provide a detailed or site-specific analysis of aesthetic impacts at any specific location; ~~because~~ the exact form of a given development cannot be accurately predicted and~~;~~ any such analysis would be speculative. Rather, the EIS assesses aesthetic impacts of the proposed action based on anticipated changes to building form, as described in the MHA Urban Design and Neighborhood Character Study (Appendix F). This chapter also illustrates the building types allowed in the study area and potential changes to building form based on the proposed MHA development regulations. Potential changes are described using graphic examples that are intended to reflect a variety of prototypical rezoning/ redevelopment situations that occur in the context of a generalized city

neighborhood/block. An example would be redevelopment of an LR1 zoned parcel in an existing single family neighborhood. These prototypes are not specific to any individual neighborhood or urban center, but rather represent situations that could occur in many neighborhoods in the city as a result of rezoning and future redevelopment. Representative urban villages that reflect each prototypical redevelopment situation are identified in the analysis.

The next subsection discusses the potential impacts common to all alternatives relative to the MHA program elements described in Chapter 2 (i.e., (M), (M1), and (M2) zoning changes, urban village expansions, and changes to development regulations). It includes illustrative models of changes in building form. A subsequent discussion of impacts specific to each alternative addresses the geographic distribution of impacts across the study area and how each alternative would affect the aesthetic character of individual urban villages. The analysis also highlights potential impacts to urban villages according to the displacement risk and access to opportunity categories.

IMPACTS COMMON TO ALL ALTERNATIVES

All the alternatives would result in a general increase in the level of development in the study area compared to existing conditions. The increase may result from expected growth as anticipated in the Comprehensive Plan and/or an additional increment of growth from the proposed zoning changes. As described in Chapter 2, each alternative would distribute capacity for future residential and commercial growth to different areas of the city, though all alternatives would locate most future growth in urban villages. As Alternative 1 No Action would not implement MHA and would not modify existing development regulations, the following discussion pertains only to Alternatives 2 and 3.

MHA implementation under Alternatives 2 and 3 would increase development capacity in the study area, resulting in an incremental increase in the scale and intensity of development. The increase varies by urban village and by alternative. The effects of this increase on development character; building height, bulk, and scale; and views are

discussed below. As described in Chapter 2, MHA implementation would include changes to zoning, development regulations, and the Future Land Use Map:

- **(M), (M1), (M2) Suffix Zoning Changes:** Zoning changes to create additional development capacity under MHA are classified into three categories based on the magnitude of the zoning change:
  - » (M) suffix: Applies when a zone changes to a zone in the same category.
  - » (M1) suffix: Applies when a zone changes to a zone in the next highest category.
  - » (M2) suffix: Applies when a zone changes to a zone two or more categories higher.
- **Urban Village Expansions:** Both action alternatives would expand certain urban village boundaries, as studied in the Seattle 2035 Comprehensive Plan EIS. The expansions would reflect 5- to 10-minute walksheds from frequent transit stations and would vary by alternative.
- **Development Regulation Amendments:** As described in Chapter 2, both action alternatives would amend the Land Use Code to increase maximum height limits and FAR limits for Lowrise (LR), Midrise (MR), and Highrise (HR) Multifamily zones, as well as Commercial (C), Neighborhood Commercial (NC), and Industrial Commercial (IC) zones. Height and FAR limits in the Seattle Mixed (SM) zones in the North Rainier Urban Village and near W Dravus St would also increase. Exhibit 3.3–9 summarizes Land Use Code amendments under the action alternatives, as described in the MHA Urban Design and Neighborhood Character Study and elsewhere in Appendix F.

Zone Categories

Category 1: Single Family, Residential Small Lot

Category 2: Lowrise 1, Lowrise 2

Category 3: Lowrise 3, Neighborhood Commercial 40, Neighborhood Commercial 55

Category 4: Zones with height limits greater than 55’ and equal to or less than 95’

Category 5: Zones with heights greater than 95’ (requires individual assessment)

Exhibit 3.3–9 Land Use Code Amendments, Alternatives 2 and 3

Zone	Land Use Code Amendments (Alternatives 2 and 3)
Lowrise 1 (LR1)	• Remove density limit • Implement family-sized unit requirement. • Increase maximum FAR by 0.1–0.3 depending on building type. • Implement a side façade modulation requirement.
Lowrise 2 (LR2)	• Increase height limit from 30 feet to 40 feet. • Increase maximum FAR by 0.1–0.2 depending on building type. • Require an upper-story setback above 30 feet. • Implement a side façade modulation requirement.
Lowrise 3 (LR3)	• Increase height limit from 40 feet to 50 feet. • Increase maximum FAR by 0.2–0.3 depending on building type. • Require a 12-foot upper-story setback above 40 feet. • Implement a side façade modulation requirement.
Midrise (MR)	• Increase height limit from 60 feet (75 with bonus) to 80 feet. • Increase maximum FAR from 3.2 (4.25 with bonus) to 4.5. • Require upper-story setbacks above 70 feet (15-foot front and 5-foot sides). • Limit building depth to 80 percent of lot depth.
Highrise (HR)	• Increase height limit from 300 feet to 340 feet. • Increase maximum FAR (with bonuses): » For buildings 240 feet tall or less, increase FAR from 13 to 14. » For building taller than 240 feet, increase FAR from 14 to 15.
Neighborhood Commercial (NC)	• NC-30: » Increase height limit from 30 feet to 40 feet. » Increase maximum FAR from 2.5 to 3.0 and remove single-use limit. • NC-40: » Increase height limit from 40 feet to 55 feet. » Increase maximum FAR from 3.25 to 3.75 and remove single-use limit. » Implement upper story setback above 45 feet. » Implement façade modulation requirement. • NC-65: » Increase height limit from 65 feet to 75 feet. » Increase maximum FAR from 4.75 to 5.5 and remove single-use limit. » Implement an upper story setback above 55 feet. » Implement a massing break at 240 feet of width. » Require façade modulation. • NC-85: » Increase height limit from 85 feet to 95 feet. » Increase maximum FAR from 6.0 to 7.0 and remove single use limit. » Implement upper story setback above 75 feet. » Implement a massing break at 240 feet of width. » Require façade modulation. • NC-125: » Increase height limit from 125 feet to 145 feet. » Increase maximum FAR for single uses from 5.0 to 6.0 and for all uses from 6.0 to 7.0. • NC-160: » Increase height limit from 160 feet to 200 feet. » Increase maximum FAR for single uses from 5.0 to 6.5 and for all uses from 7.0 to 8.25

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

Continued on following page

Exhibit 3.3–9 ~~Action Alternative~~ Land Use Code Amendments, Alternatives 2 and 3 (cont.)

Zone	Land Use Code Amendments (Alternatives 2 and 3)
Seattle Mixed (SM)	North Rainier Zones (SM-NR) • SM-NR 65: » Increase height limit from 65 feet to 75 feet. » Increase maximum FAR from 5.0 to 5.25. • SM-NR 55/75: » Increase residential height limit (with bonus) from 75 feet to 85 feet. • SM-NR 85: » Increase height limit from 85 feet to 95 feet. » Increase maximum FAR from 6.0 to 6.25. • SM-NR 125: » Increase height limit from 125 feet to 145 feet. » Increase maximum FAR from 8.0 to 8.25. Dravus Zone (SM-D) • SM-D 40-85: » Increase maximum height (with bonus) from 85 feet to 95 feet.

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

Development, Height, Scale and Character

Under Alternatives 2 and 3, MHA zoning changes would increase maximum height limits and allow larger, more visually prominent building forms and greater development intensity. The aesthetic impact of taller and larger buildings can vary substantially depending on an area's existing character, the magnitude of change compared to existing limits, and location relative to other development and sensitive resources, such as parks and public open space. In areas where MHA implementation would allow development to cover greater portions of a lot, potential loss of vegetation or trees could have an aesthetic impact.

Since they approximate the magnitude of an MHA zone change, the (M), (M1), and (M2) tiers are useful for describing how the zone changes could potentially affect development character, intensity, and building scale study area.

(M) Tier Zoning Changes

As described in Chapter 2, zones with an (M) suffix would remain in the same zoning category. (M) zoning changes would result in a similar level of development intensity as the current zoning, in most cases allowing one additional story in new buildings compared to what existing regulations allow.

Where (M) zoning changes occur in existing Lowrise 2, Lowrise 3, Commercial, and Neighborhood Commercial zones, a one-story increase in the height limit would apply and FAR increases would enable additional floor area to occupy the additional height. The proposal wouldn't reduce existing setback requirements and design standards in these areas. Therefore, the primary effect would be taller buildings with the same footprint existing regulations allow.

The height limit would not change for (M) zoning changes in existing Lowrise 1 zones. The proposal would result in only minor increases in the bulk and scale of new buildings. An increase of 0.1–0.2 in the maximum FAR limit could result in some additional floor area compared to existing regulations. But since existing setback and design standards would remain, Lowrise 1 (M) zones would have only minor aesthetic impacts.

In Single Family zones, (M) zoning changes apply only for rezones to Residential Small Lot (RSL). The same maximum height limit would apply to new homes in RSL as existing Single Family zones. However, new homes could be built closer to lot lines and could generally cover 15 percentage points more of a lot's area compared to development under existing regulations.[1] A smaller front yard setback requirement would enable new structures to be closer to the street than the typical pattern in established single-family areas. However, the proposed FAR limit of 0.75 would limit the overall quantity of floor area that could be built on a typical lot to roughly the same amount as could be built under existing regulations for development in Single Family zones. The primary aesthetic impacts would be smaller yards between structures, a reduction in separation from neighboring structures, and a break from the established pattern of front yards on typical streets in single-family areas. Exhibit 3.3–11 shows a conceptual model of RSL infill development associated with an (M) zoning change in an existing single-family neighborhood.

In some higher-intensity zones, height increases associated with (M) zoning changes exceed a single story (30 feet or more). Multi-story height increases occur only where existing regulations already allow tall buildings, thereby making less severe the aesthetic and visual impact of greater height increases. One such development capacity increase would occur in the Highrise Residential (HR) zone. In this FEIS, development

1 *Maximum lot coverage in Single Family zones is 35 percent of lot area for lots 5,000 square feet and larger and 15 percent of lot area plus 1,000 square feet for lots under 5,000 square feet.*

standards are proposed for (M) tier capacity increases that are intended to improve urban design outcomes at the time of MHA implementation. The proposed changes would encourage taller tower developments with more slender profiles, instead of bulky, multi-tower developments on large sites. The sections on alternative-specific impacts describe the geographic distribution of these larger height increases.

(M) zoning changes represent the least-impactful tier of MHA rezones, but they still have the potential to affect neighborhood character by allowing taller and larger buildings, changes in building typology, and changes to lot coverage limits and required setbacks. Regardless of change to height limits, the primary aesthetic effect of (M) zoning changes would be increased building bulk and visual prominence due to changes in allowed building forms.

(M1) Tier Zoning Changes

As described in Chapter 2, (M1) zoning changes move lands to a zone in the next highest zoning category. This would result in an increase in development intensity beyond what existing development regulations allow. Similar to (M) zoning changes, (M1) zoning changes may include increased maximum height, FAR, and density limits. In most cases, (M1) zoning changes would result in height limit increases of two additional stories compared to what existing regulations allow, in similar types of buildings and similar footprints.

(M1) zoning changes in existing Lowrise 2, Lowrise 3, Commercial, and Neighborhood Commercial zones with 30- and 40-foot height limits would result in increases of about two stories beyond what current zoning allows. FAR limit increases would enable additional floor area to occupy this extra height. In these areas, existing setback requirements and design standards would remain. The primary effect would be taller buildings that occupy the same general footprint as existing regulations allow.

In higher-intensity zones, including the Midrise zone Commercial and Neighborhood Commercial zones with height limits of 65 feet or more, (M1) zoning changes could result in height increases of 35 feet or more. The sections on alternative-specific impacts describe the geographic distribution of these larger height increases.

(M1) zoning changes in existing Lowrise 1 zone would allow buildings two stories taller than existing regulations allow and would likely result in buildings of a different format. Instead of rowhouses and townhouses

with individual unit entries, the (M1) capacity increase would likely result in apartment buildings with stacked units or, if new zoning allowed, mixed-use commercial structures. An aesthetic change in the predominant building form for infill development could occur.

In Single Family zones, (M1) zoning changes apply for rezones to Lowrise 1 and Lowrise 2. In these areas, infill development would likely take on a different character and format than the established context. New development would likely be a mix of attached rowhouses and townhouses or small multi-unit apartment structures instead of detached single-family homes. Front and rear setbacks in new development would be smaller than many existing buildings. Yards would be smaller than on many existing single-family lots, and some structures could be closer together than existing regulations allow.

(M1) zoning changes would increase building bulk and visual prominence due to greater height, and in some cases more intense building forms allowed by the new zoning. These changes would potentially include smaller building setbacks and more visually prominent building forms, which could reduce the amount of direct sunlight reaching ground level in public rights-of-way and other locations near infill development. Exhibit 3.3–13 and Exhibit 3.3–14 show a conceptual model of an (M1) zoning change from Single Family to Lowrise 1 that results in taller buildings, greater lot coverage, and increased visual bulk.

The City could apply additional design standards, such as upper-story setbacks and façade modulation, in areas with (M1) zoning changes to mitigate the effects of increased height and bulk on neighborhood character. Compatibility impacts could specifically arise where (M1) zoning is adjacent to lower-intensity zones. Design standards, such as increased setbacks for properties on the edges of (M1) zones or graduated height limits or setbacks, could soften abrupt transitions between zones. 3.3.3 Mitigation Measures describes these recommendations.

(M2) Tier Zoning Changes

As described in Chapter 2, the (M2) suffix applies to zones that change to a zone two or more categories higher. (M2) zoning changes represent the greatest level of change from what existing development regulations allow. They would result in increased height and bulk, changes to street-level pedestrian experience, and in many cases different building types. Exhibit 3.3–18 shows a conceptual model of infill development in an existing Single Family zone that becomes a Lowrise 3 (M2) zone.

As shown in Exhibit 3.3–15 and Exhibit 3.3–16, the intensity of potential changes to development character in an area with an (M2) zoning change would exceed (M) and (M1) zones. (M2) zones would allow buildings with three or more additional stories compared to what existing regulations allow. (M2) zoning changes would enable new development types that could differ from existing development and could mark a transition to a different neighborhood character where applied. Examples include the allowance of commercial street frontages in areas until now zoned only for residential uses. Where an (M2) zoning change applies in a single-family area, new infill development would differ markedly in scale and form compared to existing buildings. Like (M) and (M1) zones, impacts associated with (M2) zoning changes would be increased building height, greater visual bulk, and reduced access to light and air at ground level. (M2) zones occur in limited locations in the action alternatives. The sections on alternative-specific impacts discuss their geographic distribution.

Similar to (M1) zoning changes, measures to mitigate effects of increase height and bulk on neighborhood character and the pedestrian environment in (M2) zones could include revised design standards, such as upper-story setbacks and façade and roof form modulation. Compatibility issues could particularly occur where (M2) zoning is adjacent to lower-intensity zones. Design standards, such as increased setbacks for properties on the edges of (M2) zones or graduated height limits, could address conflicts in building scale where (M2) zones contrast with and transition to lower-intensity development. 3.3.3 Mitigation Measures describes these recommendations.

In Exhibit 3.3–10 through Exhibit 3.3–22,white buildings indicate existing context structures built under current zoning or regulations predating current zoning. Buildings in blue are new single-family structures built under existing regulations for Single Family zones. Buildings in gold are hypothetical buildings built under the proposed regulations.

Exhibit 3.3–10
Infill Development in Single Family Zone Under Existing Regulations, No Action

Source: City of Seattle, 2017.

Exhibit 3.3–10, Exhibit 3.3–11, and Exhibit 3.3–12 show a scenario in an urban village where existing Single Family zoning becomes Residential Small Lot (RSL).

The graphics show a No Action scenario of infill single-family development over a 20-year period (Exhibit 3.3–10). This compares with a scenario of infill development over a 20-year period with RSL housing types (Exhibit 3.3–11) in a distributed pattern. The third image (Exhibit 3.3–12) shows a pattern where a high concentration of infill development of RSL housing types is added in a single area in the block.

As illustrated in Exhibit 3.3–10 through Exhibit 3.3–12, the (M) Tier infill development in this example introduces building forms with moderately greater mass and bulk than the existing development pattern, with the same height limit between the No Action and Action alternatives. The result is a slightly more urban character with buildings located closer to the street and slightly less space between pedestrians and the RSL homes.

Exhibit 3.3–11
Infill Development of Residential Small Lot (RSL) Housing in Single Family Context, (M) Zoning Change

Source: City of Seattle, 2017.

Exhibit 3.3–12
Infill Development of Residential Small Lot (RSL) Housing in Single Family Context, (M) Zoning Change—Concentrated Development Pattern

Source: City of Seattle, 2017.

Relevant urban villages include:

All urban villages with proposed RSL zoning.

Exhibit 3.3–13 and Exhibit 3.3–14 show a scenario in an urban village with existing Single Family zoning that becomes Lowrise 1 (M1) on one side of the street. The other side is an existing Lowrise 2 zone that receives a standard (M) zoning change and becomes Lowrise 2 (M) with the proposed Land Use Code regulations.

The images illustrate the proposed Lowrise 1 (M1) zoning in an existing single-family context and the relationship of proposed Lowrise 2 (M) zoning to existing single-family structures and infill Lowrise 1 structures across the street.

Aesthetic impacts include the smaller setbacks at the street edge in the Lowrise (M1) zone. Greater lot coverage and smaller side and rear setbacks result in some bulk and scale impacts where infill Lowrise 1 structures are adjacent to existing single-family homes. Impacts could include reduction in privacy for some property owners. Although height limits do not change, aesthetic impacts of the (M1) increase are noticeable in areas zoned for low-intensity uses, such as existing single-family zones.

In the Lowrise 2 (M) example seen in Exhibit 3.3–13 and Exhibit 3.3–14, the primary aesthetic impact is the presence of one additional story compared to existing regulations. Here, the height limit increases from 30 feet to 40 feet, allowing four-story rather than three-story buildings. An upper-level setback, proposed as part of the Lowrise 2 zone changes, mitigates the appearance at street level of additional bulk.

Application of design standards, such as upper-level setbacks, side façade modulation requirements, and privacy standards, in Lowrise zones with (M) and (M1) suffixes would mitigate the effects of increased height and bulk on neighborhood character and the pedestrian environment. 3.3.3 Mitigation Measures describes these recommendations.

Exhibit 3.3–13
Lowrise 1 (M1) and Lowrise 2 (M) Infill Development

Source: City of Seattle, 2017.

Exhibit 3.3–14
Lowrise 1 (M1) and Lowrise 2 (M) Infill Development

Source: City of Seattle, 2017.

Relevant urban villages include:

Columbia City, Fremont, North Rainier, 23rd & Union–Jackson, Morgan Junction, and Wallingford.

Exhibit 3.3–15 and Exhibit 3.3–16 show a scenario in an urban village with existing Single Family zoning. On one side of the street the zoning is changed to Lowrise 3 with an (M2) suffix. Zoning on the other side of the street zoning becomes Lowrise 2 with an (M1) suffix.

Exhibit 3.3–15 shows infill development over a 20-year period with lowrise housing types in a distributed pattern. Exhibit 3.3–16 shows a high concentration of lowrise infill development.

In the (M2) area, height limits increase to 50 feet, allowing buildings two stories taller than the existing single-family context. Apartment buildings with stacked units and single building entries, as opposed to detached single-family homes, would mark a change in character from the existing built form. Smaller front and rear setbacks would reduce the amount of yard space compared to development under existing single-family regulations. The street would become more urban in character as the neighborhood experiences new infill buildings.

Application of design standards, such as upper-level setbacks, side façade modulation requirements, and privacy standards, in Lowrise zones with (M) and (M1) suffixes would mitigate the effects of increased height and bulk on neighborhood character and the pedestrian environment. 3.3.3 Mitigation Measures describes these recommendations.

Exhibit 3.3–15
Lowrise 2 (M1) and Lowrise 3 (M2) Infill Development

Source: City of Seattle, 2017.

Exhibit 3.3–16
Lowrise 2 (M1) and Lowrise 3 (M2) Infill Development—Concentrated Development Pattern

Source: City of Seattle, 2017.

Relevant urban villages include:

Columbia City, Crown Hill, Roosevelt, North Beacon Hill, Othello, Rainier Beach, West Seattle Junction, Admiral, Aurora–Licton Springs, North Rainier, 23rd & Union–Jackson, Madison–Miller, Morgan Junction, Wallingford, Westwood–Highland Park.

Exhibit 3.3–17 and Exhibit 3.3–18 display an area adjacent to a public open space in an urban village with existing Single Family zoning that becomes Lowrise 2 (M1). The graphics show a No Action scenario of infill single-family development over a 20-year period. This compares to a scenario of infill development over a 20-year period with Lowrise 2 housing types. The illustration shows relationships of new infill development to the open space including the potential extent of shadowing. The scenario depicts a 5:00 p.m. condition on an equinox for the purposes of evaluating the extent of shadows across the right-of-way.

The impacts of the proposed Lowrise 2 (M1) change are the potential for a building with one more story than existing regulations allow and buildings located closer to the front lot line compared to existing single-family homes. Shadows from buildings reach the open space's edge under the No Action and Action scenarios. Some increase in the amount of shadowing is evident. However, due to the width of the right-of-way the longer shadows extend only a short distance into the public space.

A street-facing upper-story setback aids in reducing the amount of additional shadowing of the adjacent open space. 3.3.3 Mitigation Measures describes these recommendations.

Exhibit 3.3–17
Single Family Infill Development Adjacent to a Public Open Space, No Action

Source: City of Seattle, 2017.

Exhibit 3.3–18
Lowrise 2 (M1) Infill Development Adjacent to a Public Open Space

Source: City of Seattle, 2017.

Relevant urban villages include:

Crown Hill, Roosevelt, North Beacon Hill, Othello, Rainier Beach, Admiral, Aurora–Licton Springs, North Rainier, 23rd & Union–Jackson, Madison–Miller, Morgan Junction, South Park, Wallingford.

Exhibit 3.3–19 and Exhibit 3.3–20 illustrate a scenario of existing Neighborhood Commercial 40 zoning with a proposed zoning change to NC-55 with an (M) MHA tier capacity increase. The scenario depicts a transition, as the rear of the neighborhood commercial zone, across the street, is an area of existing single family zoned land that has a proposed zoning change to a Lowrise 1 zone with an (M1) MHA tier. Exhibit 3.3–19 shows a No Action scenario for comparison.

This scenario shows the scale relationships of a neighborhood commercial area along an arterial roadway transitioning to a residential area a block off of the arterial roadway. The No Action image shows the relationship of NC-40 existing development to the adjacent single family zoned neighborhood under existing regulations. The other images show the relationship of infill development under proposed NC-55 zoning to the residential neighborhood with proposed new LR1 zoning. Some new infill development under the proposed LR1 zone is shown over the 20-year period alongside single family homes that remain in place.

The primary impact of the (M) Tier capacity increase to NC-55 is the increased height, which allows for the presence of a 5 story building across the street from the residential zone. The additional story contributes to greater visual bulk and has some reduction to the amount of light and air at ground level.

Targeted application of design standards, such as upper-story setbacks and façade modulation (included in Exhibit 3.3–20), may be necessary in transition areas to mitigate the effects of increased height and bulk on neighborhood character and the pedestrian environment.

Exhibit 3.3–19
Transition Area, No Action

Source: City of Seattle, 2017.

Exhibit 3.3–20
Transition Area, Lowrise 1 (M1) and Neighborhood Commercial (M) Infill Development

Source: City of Seattle, 2017.

Relevant urban villages are:

Areas with transitions between Neighborhood Commercial zones on mixed use corridors, to residential areas. These include: Upper Queen Anne, North Beacon Hill, Wallingford, Morgan Junction, West Seattle Junction, Crown Hill, Greenwood Phinney-Ridge, and Westwood-Highland Park.

Exhibit 3.3–21 and Exhibit 3.3–22 show a mixed-use corridor with existing Neighborhood Commercial 40 zoning along an arterial road. Exhibit 3.3–21 depicts No Action. Exhibit 3.3–22 illustrates an (M) zoning change on one side of the street to Neighborhood Commercial 55. The other side becomes Neighborhood Commercial 75 with an (M1) suffix. Both scenarios depict potential infill development under the applicable zoning regulations over a 20-year period.

The images display scale relationships of infill development under proposed regulations compared to both existing structures and development that could occur under existing regulations.

The increased building height of both the (M) and (M1) zoning changes would increase visual bulk and reduce access to light and air at street level. Under the action scenario, the street has a more urban character, with a continuous street wall five to six stories tall. From the perspective of pedestrians in the public realm, this results in a different experience and a greater sense of enclosure by buildings.

In both the (M) and (M1) zones, the upper-story setbacks mitigate the appearance of bulk to the building's upper stories as viewed from street level. Façade modulation requirements add variety to the buildings' façades. These design standards may be necessary to mitigate the effects of increased height and bulk on neighborhood character and the pedestrian environment in mixed-use corridors and neighborhood business districts.

Exhibit 3.3–21
Neighborhood Commercial Zoning, No Action

Source: City of Seattle, 2017.

Exhibit 3.3–22
Neighborhood Commercial (M) and (M1) Infill Development

Source: City of Seattle, 2017.

Relevant urban villages include:

All urban villages with NC-40 or NC-65 zoning.

Urban Village Expansion Areas

The Seattle 2035 Comprehensive Plan EIS (May 2016) analyzed the potential aesthetic and urban design impacts associated with expanding the boundaries of certain urban villages to reflect walksheds around high-frequency transit stations, though no urban village expansions were adopted as part of the Comprehensive Plan update. As described in the Comprehensive Plan EIS, most development in the proposed urban village expansion areas is a much lower-intensity than in the urban villages themselves. Much of these peripheral areas is zoned Single Family, and building height limits are generally lower than inside urban villages.

Because expansion areas are at the edges of urban villages, they would likely function as transitional areas, forming a buffer between the most intense development in the urban village and the low-intensity neighborhoods surrounding it. However, expanding urban villages would, over time, lead to the conversion of existing development to higher-intensity uses, development of taller buildings, and establishment of a more urban character in the expansion areas, compared with existing conditions. This conversion would include the gradual introduction of taller, more prominent buildings with potentially greater site coverage than existing development. Since development tends to be incremental, temporary conflicts of height and scale may arise between older and newer buildings as properties convert to more intense uses at different times.

The location and extent of urban village expansions would vary by alternative, and impacts associated with specific urban village expansion areas are described in the sections on alternatives-specific impacts.

Development Regulation Amendments

As described in Chapter 2 and summarized in Exhibit 3.3–9, both action alternatives would amend the Land Use Code to create additional capacity in Lowrise, Midrise, Highrise, Neighborhood Commercial, Commercial, and Seattle Mixed zones. These capacity increases would result from a combination of increased height, FAR, and density limits. Under Alternative 2, the amended development regulations would apply to approximately 2,286 acres of the study area, slightly less than the Alternative 3, which would apply the amended development regulations to approximately 2,416 acres.

In both action alternatives, these Land Use Code amendments would increase building height and bulk beyond current conditions, which could

alter the character of development in large portions of the study area. The aesthetic impacts of these amendments are described in the description of the (M), (M1), and (M2) zoning changes and in the exhibits above.

View Obstruction and Shading Effects

Under both action alternatives, MHA implementation would result in localized increases in building height and bulk and increased development intensity relative to existing conditions in the study area. Increased height and bulk can interfere with protected view corridors and scenic routes and with private views. Private views are not protected to the same extent as public view corridors, but the Design Review process can consider impacts to them.

Increased building height and bulk in the study area can also increase shading effects on public spaces and private property. Large height limit increases have the potential to generate significant shading effects on the street-level pedestrian environment, especially if several buildings redevelop along a particular street. Taller buildings in transition areas can also potentially shade shorter buildings and properties in adjacent lower-intensity zones. View and shading impacts associated with height increases vary in location under each alternative and are further discussed in the alternative-specific impacts sections.

IMPACTS OF ALTERNATIVE 1 NO ACTION

Under Alternative 1 No Action, MHA would not be implemented. Residential and commercial development consistent with the adopted comprehensive plan would occur over the 20-year planning period, leading to increased development compared to existing conditions, as analyzed in the Seattle 2035 Comprehensive Plan Final EIS. No zoning changes or urban village expansions associated with MHA would occur, and Alternative 1 would not result in any significant aesthetic impacts beyond those analyzed in the Comprehensive Plan EIS.

IMPACTS OF ALTERNATIVE 2

As described in Chapter 2, Alternative 2 would implement MHA, directing most future growth to urban villages, primarily to areas currently zoned for commercial and multifamily development. Alternative 2 would also include expand certain urban village to reflect a 10-minute walkshed around high-frequent transit nodes.

Development Character, Height, and Scale

Impacts to development character, height, and scale under Alternative 2 would resemble those described under Impacts Common to All Alternatives. The following sections describe the distribution of those impacts across the Study Area under Alternative 2.

(M), (M1), and (M2) Zoning Changes

Exhibit 3.3–23 shows the extent and distribution of (M), (M1), and (M2) zoning changes in the study area under Alternative 2. As described in Chapter 2, (M) zoning changes cover the largest portion of the study area: 73 percent of all lands where MHA would be implemented. (M1) and (M2) zoning are concentrated in localized areas. In Alternative 2, 23 percent of lands proposed for MHA have (M1) zoning and only four percent (M2). As described under Impacts Common to All Alternatives, (M1) and (M2) zoning changes generally represent greater changes to building character and bulk than (M) zoning changes due to changes in allowed building types.

(M2) Zoning Changes. Under Alternative 2 the largest areas of (M2) zoning occur in several urban villages in southeast Seattle near existing light rail stations, near the future light rail station between North Rainier and 23rd & Union–Jackson, and near future light rail stations in Roosevelt and Ballard. The largest single area of (M2) zoning would be in the eastern edge of the Othello Urban Village, which roughly corresponds to the proposed urban village expansion area, which is illustrated in Exhibit 2–18.

In Alternative 2 many of the larger areas of (M2) increases, are in areas with high displacement risk and low access to opportunity. Therefore, compared to Alternative 3, more of the localized aesthetic impacts associated with (M2) could be seen in areas with high displacement risk and low access to opportunity. Fewer areas of localized (M2) aesthetic impacts and changes to character would occur in areas with low displacement risk and high access to opportunity. (See also Chapter 2).

(M1) Zoning Changes. Under Alternative 2 several of the largest areas of (M1) zoning are located in urban villages near the center of the city in First Hill–Capitol Hill, Madison–Miller, and between North Rainier and 23rd & Union–Jackson. The largest single area of (M1) is in north Capitol Hill, where a large swath of land currently zoned Lowrise 3 would be changed to Midrise, enabling a roughly three-story height increase in a neighborhood already predominantly characterized by multifamily housing. Southeast and southwest Seattle urban villages would have

sizeable areas of (M1) zoning, including Westwood–Highland Park, South Park, Rainier Beach, Othello, and Columbia City, and West Seattle Junction.

In Alternative 2, many larger areas of (M1) zoning also exists where displacement risk is high and access to opportunity is low. Therefore, compared to Alternative 3, more of the localized aesthetic impacts associated with (M1) zoning changes would occur in areas with high displacement risk and low access to opportunity areas. Fewer areas of the (M1) aesthetic impacts and changes to character would be present in areas with low displacement risk and high access to opportunity.

Height Increases

Increases in the maximum height limit are another way to evaluate the degree of aesthetic impact that could occur. Exhibit 3.3–24 shows the distribution of height increases in the study area due to zoning changes and Land Use Code amendments under Alternative 2. A few localized areas would have large increases in allowed building height of 65 feet or more. The largest height increases under Alternative 2 would occur in Lake City and Northgate. As shown in Exhibit 3.3–22, Alternative 2 would include an 80-foot height increase in Lake City from Neighborhood Commercial 65 to Neighborhood Commercial 145. The location is characterized by existing automobile dealerships on several large parcels. In Northgate, Alternative 2 would include a 115-foot height increase from Neighborhood Commercial 125 to Neighborhood Commercial 240 directly adjacent to the future light rail station on the site of the King County transit center, which has potential for future transit oriented development. Both areas are already heavily urbanized, and surrounding zoning already allows heights in the range of 65–85 feet (Lake City) and 85–125 feet (Northgate). However, the magnitude of these proposed height increases would result in development with high visual prominence that would be much taller than existing buildings. As a designated urban center, Northgate is appropriate for the most intensive development.

First Hill–Capitol Hill also includes height increases greater than 30 feet, specifically the previously mentioned (M2) area of north Capitol Hill and the Highrise zone in First Hill, where existing the existing height limit of 300 feet would increase to 340 feet. Since the Highrise zone already allows for tall structures, allowing 40 additional feet would have minor bulk and scale impacts compared to this magnitude of height increase in other zones.

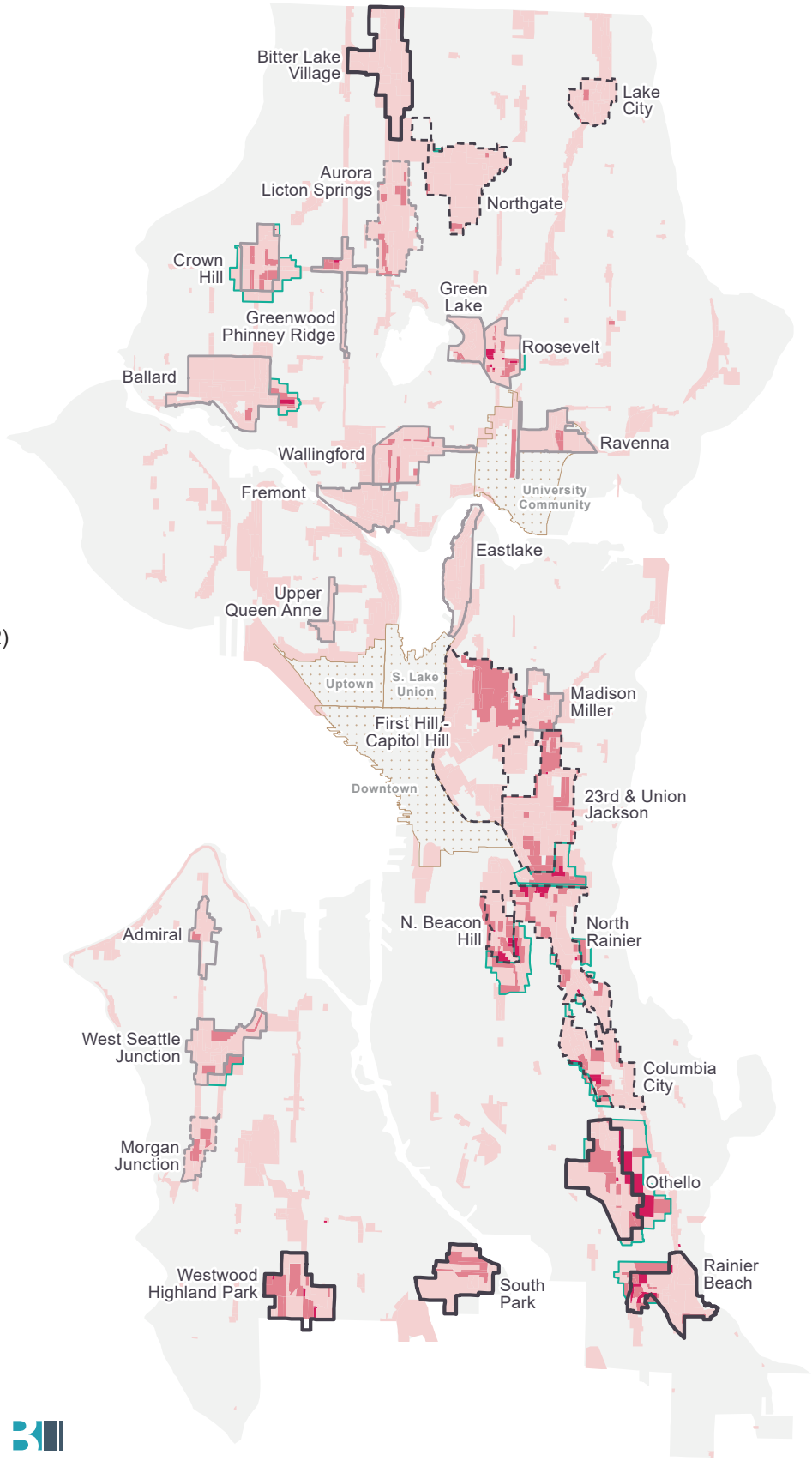

Exhibit 3.3–23
Locations of (M), (M1), and (M2) Zoning Changes—Alternative 2

Potential Expansion Areas, Alternative 2

Urban Centers/Villages, Displacement Risk and Access to Opportunity

- High Risk, Low Access
- High Risk, High Access
- Low Risk, High Access
- Low Risk, Low Access
- Outside MHA Study Area

MHA Tier

- (M)
- (M1)
- (M2)

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

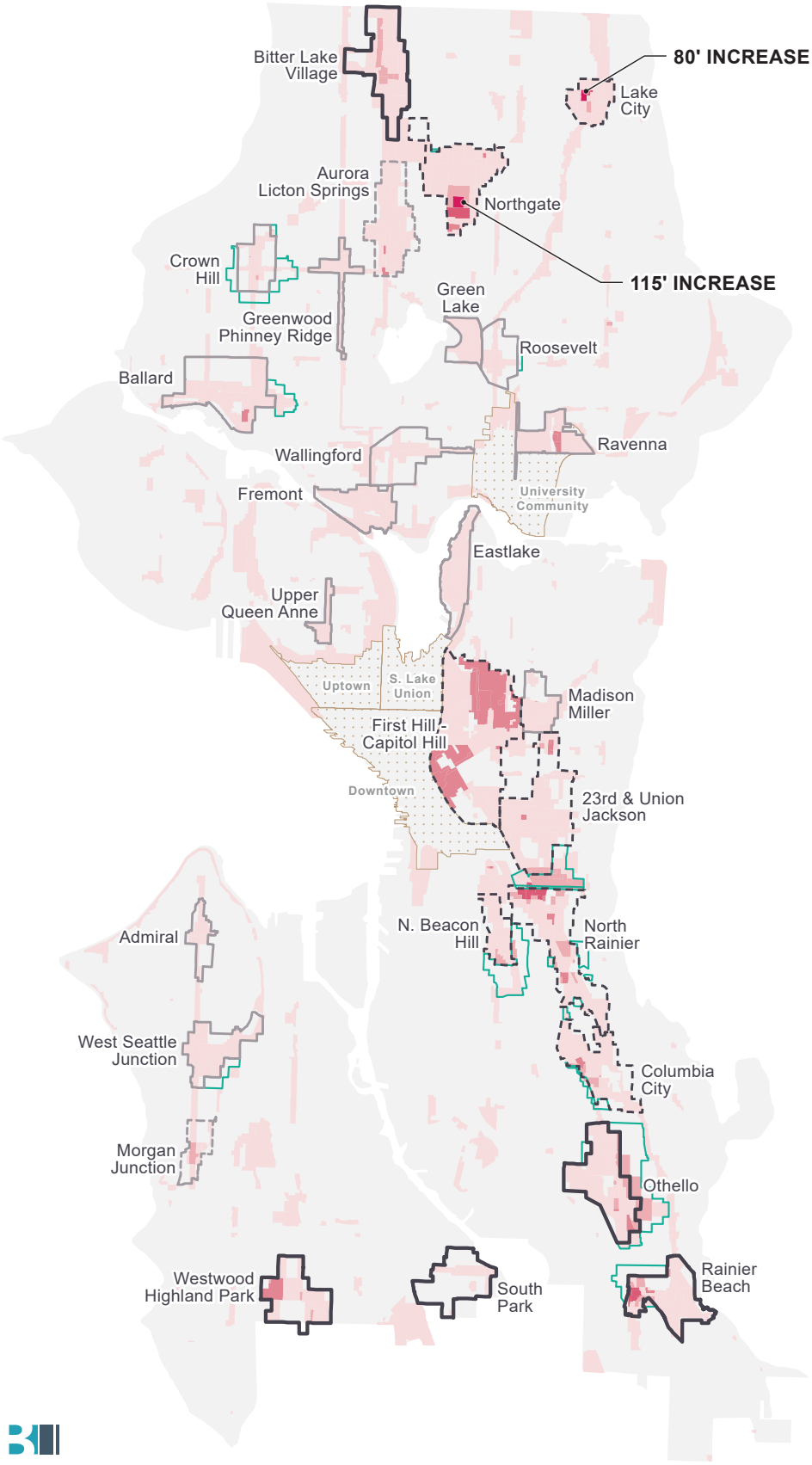

Exhibit 3.3–24
MHA Height Limit Changes—Alternative 2

Potential Expansion Areas, Alternative 2

Urban Centers/Villages, Displacement Risk and Access to Opportunity

- High Risk, Low Access
- High Risk, High Access
- Low Risk, High Access
- Low Risk, Low Access
- Outside MHA Study Area

Change in Maximum Buildable Height

- 5 to 15 ft
- 16 to 30 ft
- 31 to 45 ft
- 46 to 65 ft
- 66 ft or more

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

Other areas with height increases of three or more stories include North Rainier near the future light rail station, Westwood–Highland Park on the site of the Westwood Village shopping mall, and Rainier Beach adjacent to the light rail station.

Compared to Alternative 3, Alternative 2 distributes the greatest building height increases primarily to urban villages that are already densely developed, such as First Hill–Capitol Hill, Lake City, and Northgate, though height increases beyond 30 feet would also occur in small areas of North Rainier and Rainier Beach. Accordingly, Alternative 2 includes height increases of greater magnitude than Alternative 3, but they occur in a smaller area.

Concentrating large height increases in this small number of locations limits the geographic extent of impacts related to the presence of taller buildings, but results in large localized changes in height, bulk, and scale. Applying design standards and other mitigation measures could limit the effects of these height increases. In areas with very large height increases, such as Northgate and Lake City, the Design Review process can mitigate potential scale and aesthetic impacts on surrounding development.

Urban Village Expansion Areas

As described under Impacts Common to All Alternatives, proposed expansion of urban villages would introduce increased height and bulk as lower-intensity development transitions to the higher-intensity building types typical of urban villages. Alternative 2 features larger expansions of certain urban villages than Alternative 3, thereby extending these aesthetic impacts across a larger area. Some of the largest urban village expansion areas are Crown Hill, North Rainier, North Beacon Hill, and Othello. Othello, North Beacon Hill, and North Rainier are all classified as having a high risk of displacement; larger urban village expansions in these locations could potentially accelerate changes in land use and building type.

View Obstruction and Shading Effects

As described above, Alternative 2 distributes the greatest building height increases to densely developed urban villages, where development intensity and building height are already high. These height increases are greater in magnitude than Alternative 3, occur in a smaller area, and are more likely to result in significant localized shading of adjacent properties or obstruction of protected views. The precise nature and degree of

potential impacts in these locations would depend on site-specific site characteristics and the designs of individual construction projects. As applicable, project-level design review during the permit application process would include evaluation of views and shading impacts, and provide an opportunity to define site-specific mitigation.

IMPACTS OF ALTERNATIVE 3

Like Alternative 2, Alternative 3 would implement MHA, directing most future growth to urban villages, primarily to areas currently zoned for commercial and multifamily development. Alternative 3 also includes explicit consideration of each urban village's classification in the displacement risk and access to opportunity typology. Alternative 3 would expand certain urban villages to approximate a mix of 10-minute and 5-minute walksheds from frequent transit service nodes, with the extent expansion area based on the urban village's classification in the displacement risk and access to opportunity typology.

Development Character, Height, and Scale

Impacts to development character, height, and scale under Alternative 3 would resemble those described under Impacts Common to All Alternatives. The following sections describe the distribution of those impacts across the study area under Alternative 3.

(M), (M1), and (M2) Zoning Changes

Exhibit 3.3–25 shows the extent and distribution of (M), (M1), and (M2) Tier rezones in the study area under Alternative 3. As described in Chapter 2, (M) zoning changes cover the largest portion of the study area: 77 percent of all lands proposed for MHA. (M1) and (M2) Tier rezones are concentrated in localized areas. In Alternative 2, 20 percent of lands proposed for MHA have (M1) zoning changes and only three percent (M2). As described under Impacts Common to All Alternatives, (M1) and (M2) zoning changes generally represent greater changes to building character, bulk and scale than (M) zoning changes due to changes in allowed building types.

(M2) Zoning Changes. In Alternative 3 (M2) zoning changes are concentrated in Fremont, Wallingford, Ballard, Roosevelt, Crown Hill, West Seattle Junction, Admiral, and Morgan Junction. The largest contiguous areas of (M2) zoning is in Roosevelt, Wallingford, and Fremont. (M2) zoning in Wallingford and Fremont is primarily between Aurora Ave N and Stone Way N, along streets including Midvale Ave

N and Woodland Park Ave N. A mix of existing single-family and small multifamily buildings characterize these areas, and MHA implementation could result in construction of larger multifamily structures and different buildings types. Morgan Junction would also have this condition under Alternative 3.

In Alternative 3 many of the larger areas of (M2) zoning occur where displacement risk is low and access to opportunity is high. Therefore, compared to Alternative 2, more of the localized aesthetic impacts associated with (M2) zoning changes would occur in areas with low displacement risk and high access to opportunity. Fewer areas of localized (M2) aesthetic impacts and changes to character would occur in areas with high displacement risk and low access to opportunity areas, particularly the urban villages in southeast Seattle. (See also Chapter 2).

(M1) Zoning Changes. Under Alternative 3, several of the largest areas of (M1) zoning changes are in urban villages north of the Ship Canal, including Crown Hill, Wallingford, Fremont, Ballard, Roosevelt, Green Lake, and in West Seattle Junction, Morgan Junction, and Admiral in West Seattle. Many (M1) areas are instances Single Family zones in urban villages or expansion areas that would change to allow multifamily housing. In Alternative 3 many of the larger areas of (M1) increases are also in areas with low displacement risk and high access to opportunity. Therefore, compared to Alternative 2, more of the localized aesthetic impacts associated with (M1) would occur where displacement risk is low and access to opportunity is high. Fewer (M1) aesthetic impacts and changes to character would occur in areas with high displacement risk and low opportunity areas. (See also Chapter 2).

Alternative 3 also features substantial (M1) and (M2) areas in the study area's two urban villages with low displacement risk and low access to opportunity: Morgan Junction and Aurora–Licton Springs. These urban villages would experience greater aesthetic impacts under Alternative 3 compared to Alternative 2.

Height Increases

Exhibit 3.3–26 shows the distribution of height increases in the study area due to zoning changes and Land Use Code amendments under Alternative 3. The greatest increases in allowed building height would occur in Crown Hill, Aurora–Licton Springs, Green Lake, Fremont, Eastlake, First Hill–Capitol Hill, Admiral, and Morgan Junction. Overall, height limit increases would be lower under Alternative 3 than under

Alternative 2; the greatest height increase under Alternative 3 would be 65 feet, compared with 115 feet under Alternative 2.

In contrast to Alternative 2, Alternative 3 does not include major building height increases in several localized areas. Also unlike Alternative 2, the urban villages receiving the greatest height increases have generally lower risk of displacement than those affected under Alternative 2. Crown Hill, Green Lake, Fremont, Eastlake, and Admiral are classified as having low displacement risk and high access to opportunity; First Hill–Capitol Hill is classified as an area with high displacement risk and high access to opportunity; and Aurora–Licton Springs has low displacement risk and low access to opportunity.

Urban Village Expansion Areas

As described under Impacts Common to All Alternatives, expansion of urban villages would introduce increased height and bulk and different building forms in single family areas, as lower-intensity development transitions to higher-intensity building types typical of urban villages. Alternative 3 would expand certain urban villages to reflect a mix of 5- and 10-minute walksheds around frequent transit. As described in Chapter 2, urban villages classified as having a high risk of displacement would have expansion areas consistent with 5-minute walksheds from transit nodes; urban villages classified as having low risk of displacement would have full 10-minute walkshed expansion areas. As a result, Alternative 3 would extend the aesthetic impacts of urban village expansion to a smaller area than Alternative 2.

View Obstruction and Shading Effects

As described above, Alternative 3 distributes moderate building height increases across the urban villages of the study area, and avoids a few very large height increases in the concentrated areas as seen in Alternative 2. The precise nature and degree of potential impacts in locations with height increases would depend on specific site characteristics and the designs of individual construction projects. As applicable, project-level design review during the permit application process would include evaluations of views and shading impacts and provide an opportunity to define site-specific mitigation.

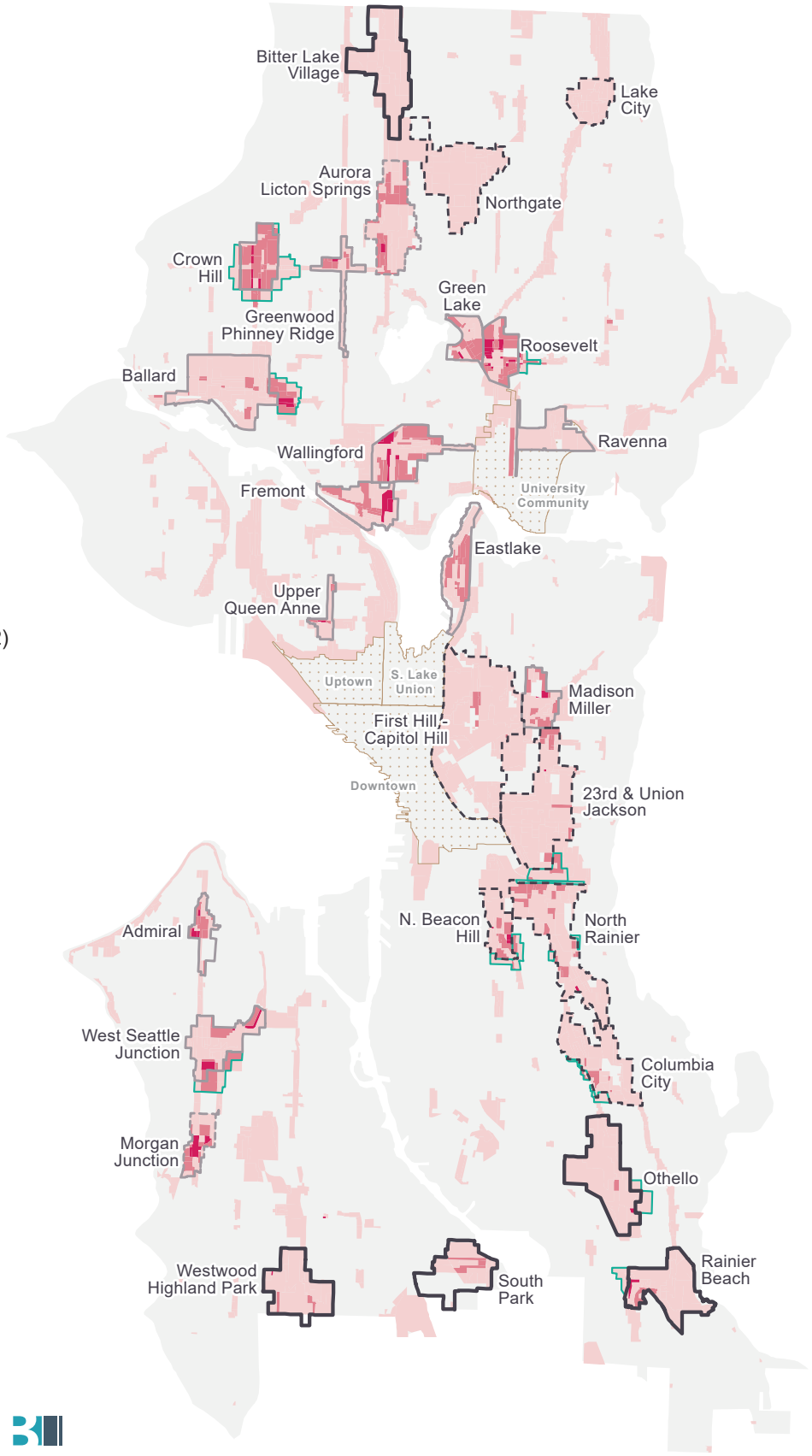

Exhibit 3.3–25
Locations of (M), (M1), and (M2) Zoning Changes—Alternative 3

Potential Expansion Areas, Alternative 3

Urban Centers/Villages, Displacement Risk and Access to Opportunity

- High Risk, Low Access
- High Risk, High Access
- Low Risk, High Access
- Low Risk, Low Access
- Outside MHA Study Area

MHA Tier

- (M)
- (M1)
- (M2)

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

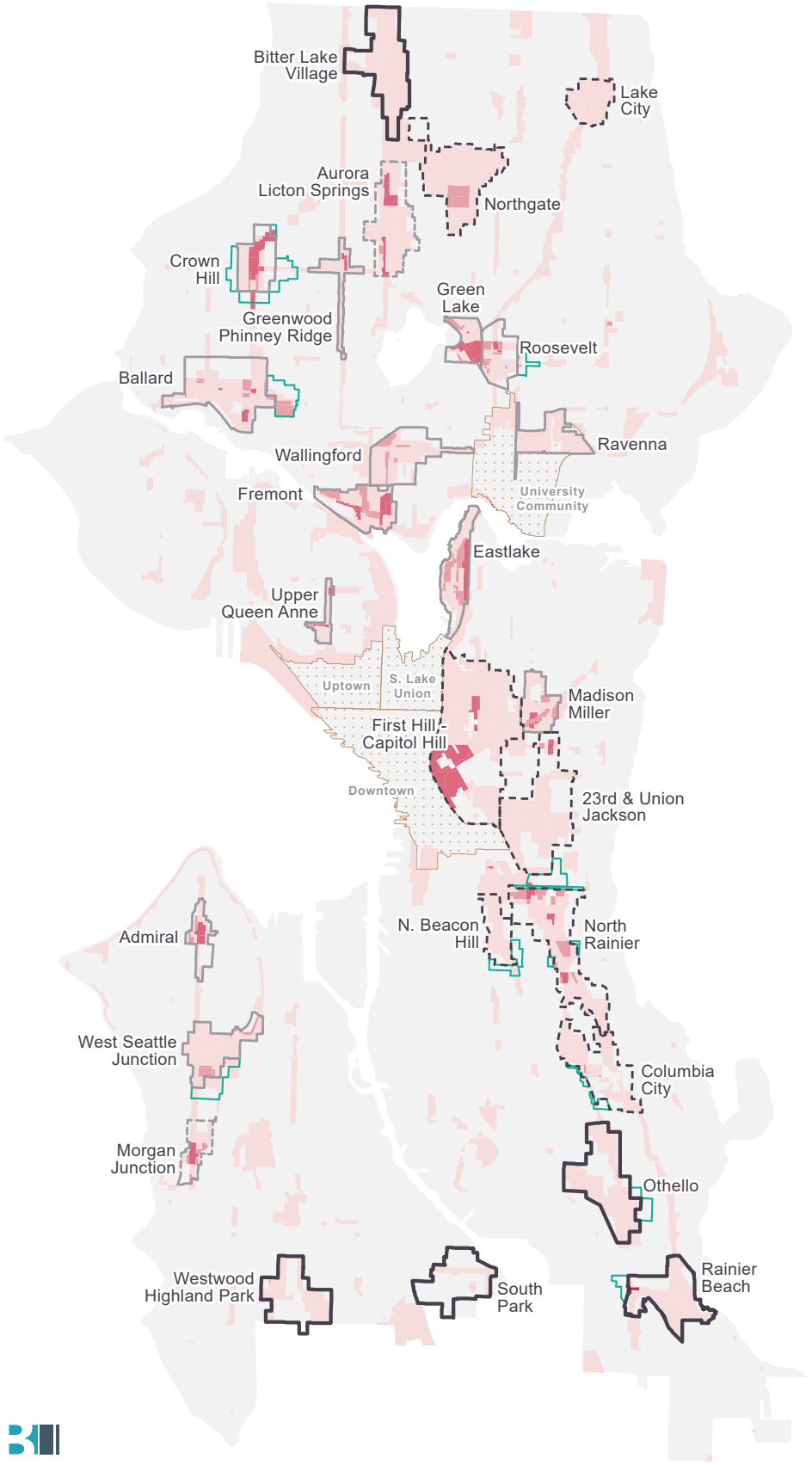

Exhibit 3.3–26
MHA Height Limit Changes—Alternative 3

Potential Expansion Areas, Alternative 3

Urban Centers/Villages, Displacement Risk and Access to Opportunity

- High Risk, Low Access
- High Risk, High Access
- Low Risk, High Access
- Low Risk, Low Access
- Outside MHA Study Area

Change in Maximum Buildable Height

- 5 to 15 ft
- 16 to 30 ft
- 31 to 45 ft
- 46 to 65 ft

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

IMPACTS OF THE PREFERRED ALTERNATIVE

New to the FEIS

Impacts of the Preferred Alternative, including Exhibit 3.3–27, Exhibit 3.3–28, Exhibit 3.3–29, and Exhibit 3.3–30, is a new section since issuance of the DEIS

The Preferred Alternative would implement MHA, directing most future growth to urban villages, primarily to areas currently zoned for commercial and multifamily development. Like Alternative 3, the Preferred Alternative would implement MHA with distinctions for each urban village's classification in the displacement risk and access to opportunity typology and would focus development capacity increases in areas with access to high-frequency transit service. As described in Chapter 2, the Preferred Alternative would include urban village expansion areas that approximate a 10-minute walkshed from frequent transit service nodes.

Development Character, Height, and Scale

Impacts to development character, height, and scale under the Preferred Alternative would resemble those described under Impacts Common to All Alternatives, with some exceptions. The Preferred Alternative would implement some additional revisions to the land use code, specifically in the Highrise Residential (HR) zone, and the Residential Small Lot (RSL) zone.

In the Preferred Alternative, development standards in the HR zone would:

- Increase height limit in the HR zone from 300 feet to 440 feet;
- Remove the tiered FAR limit in the HR zone; and
- Increase the maximum FAR in the HR zone from 14 to 15, the same amount as under Alternative 2 and 3 in the DEIS.

In the Preferred Alternative, development standards in the RSL zone would:

- Establish a new maximum dwelling unit size for any single dwelling unit, including any floor area in an attached accessory dwelling unit of 2,200 square feet;
- Establish a new tree planting requirement for new development.

These changes to the land use code would result in different impacts in the HR zone and RSL zone under the Preferred Alternative compared to Alternatives 2 or 3.

The following sections describe the distribution of aesthetic impacts across the study area under the Preferred Alternative.

(M), (M1), and (M2) Zoning Changes

Exhibit 3.3–27 shows the extent and distribution of (M), (M1), and (M2) Tier rezones in the study area under the Preferred Alternative. As described in Chapter 2, (M) zoning changes cover the largest portion

of the study area: 78 percent of all lands proposed for MHA. (M1) and (M2) Tier rezones are concentrated in localized areas, specifically in urban villages served by high-frequency transit. Under the Preferred Alternative, 20 percent of lands proposed for MHA rezones would have (M1) zoning changes, similar to Alternative 3, and only about one percent of land proposed for MHA rezones would experience (M2) tier rezones, which is the lowest of any of the action alternatives.

(M2) Zoning Changes. Under the Preferred Alternative, the largest concentrations of (M2) zoning would occur in Roosevelt, North Beacon Hill, Wallingford, Morgan Junction, and Admiral. Smaller areas of (M2) zoning would also be present in the northern portion of North Rainier near the future I-90 light rail station, in Othello and Rainier Beach along the MLK Boulevard transit corridor, in Eastlake along Eastlake Ave E, in Greenwood near Greenwood Ave N and NW 85th St, and in the northwest portion of Madison-Miller along 19th Ave E. As with the other action alternatives, a mix of existing single-family, multifamily, and neighborhood-scale commercial buildings characterize these areas, and MHA implementation could result in construction of larger multifamily structures and different buildings types.

Similar to Alternative 3, the Preferred Alternative is designed to concentrate most areas of (M2) zoning where displacement risk is low and access to opportunity is high. In urban villages where displacement risk is higher, (M2) zoning is concentrated within a 5-minute walk of a major transit node.

(M1) Zoning Changes. Similar to Alternative 3, several of the largest areas of (M1) zoning changes are in urban villages north of the Ship Canal, including Crown Hill, Wallingford, Fremont, Roosevelt, and Aurora-Licton Springs. Substantial (M1) rezoning would also occur in West Seattle Junction, Westwood-Highland Park, Columbia City, North Beacon Hill, and First Hill-Capitol Hill. Approximately 48 percent of (M1) zoning would occur in areas with low risk of displacement and high access to opportunity; this amount is 1 percent greater than Alternative 3 and 27 percent greater than Alternative 2.

The Preferred Alternative also proposes substantial (M1) areas in the study area's two urban villages with low displacement risk and low access to opportunity: Morgan Junction and Aurora–Licton Springs, though a lesser amount than Alternative 3. These urban villages would experience more extensive aesthetic change under the Preferred Alternative than under Alternative 2, but less than under Alternative 3.

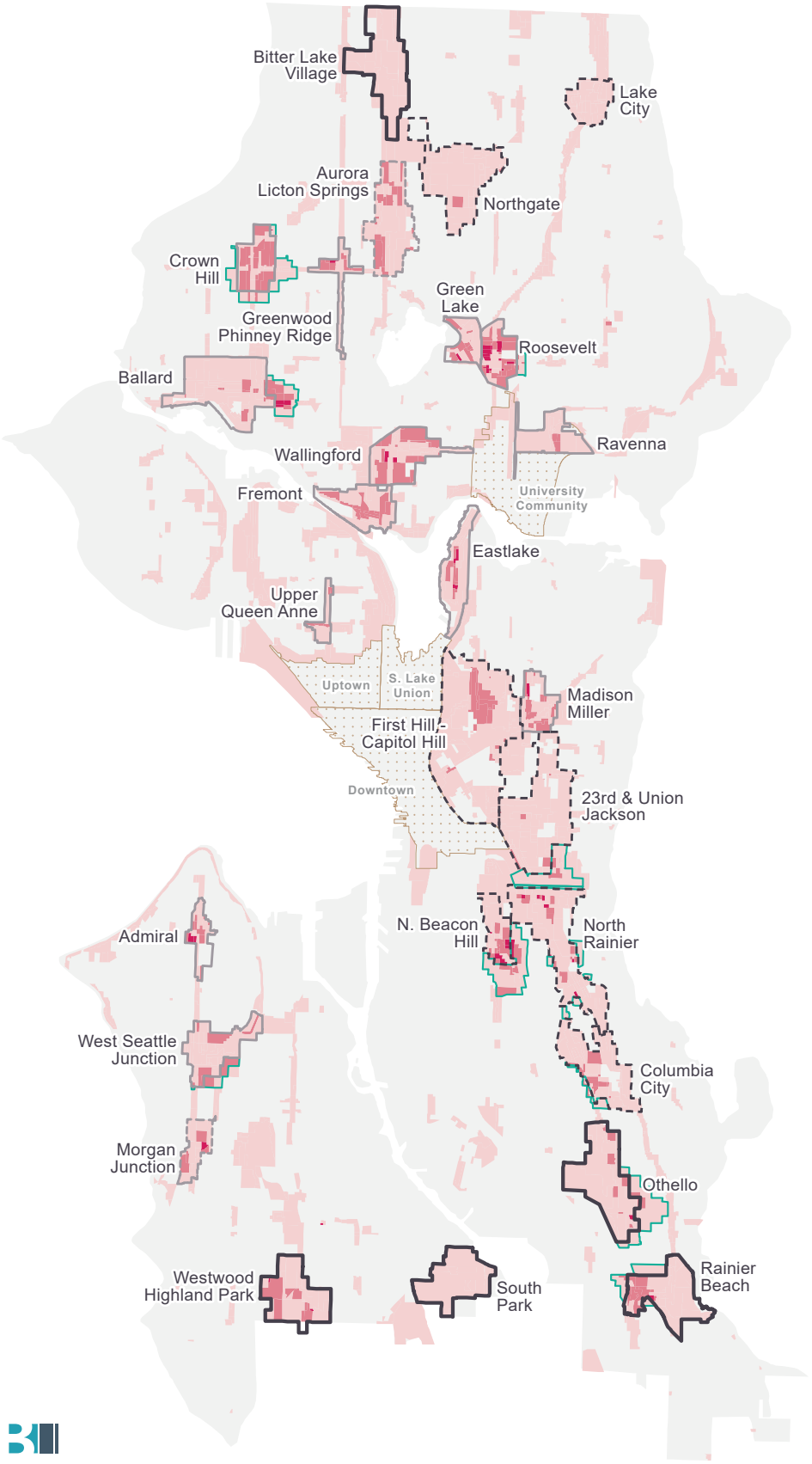

Exhibit 3.3–27
Locations of (M), (M1), and (M2) Zoning Changes—Preferred Alternative

Potential Expansion Areas, Preferred Alt.

Urban Centers/Villages, Displacement Risk and Access to Opportunity

- High Risk, Low Access
- High Risk, High Access
- Low Risk, High Access
- Low Risk, Low Access
- Outside MHA Study Area

MHA Tier

- (M)
- (M1)
- (M2)

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

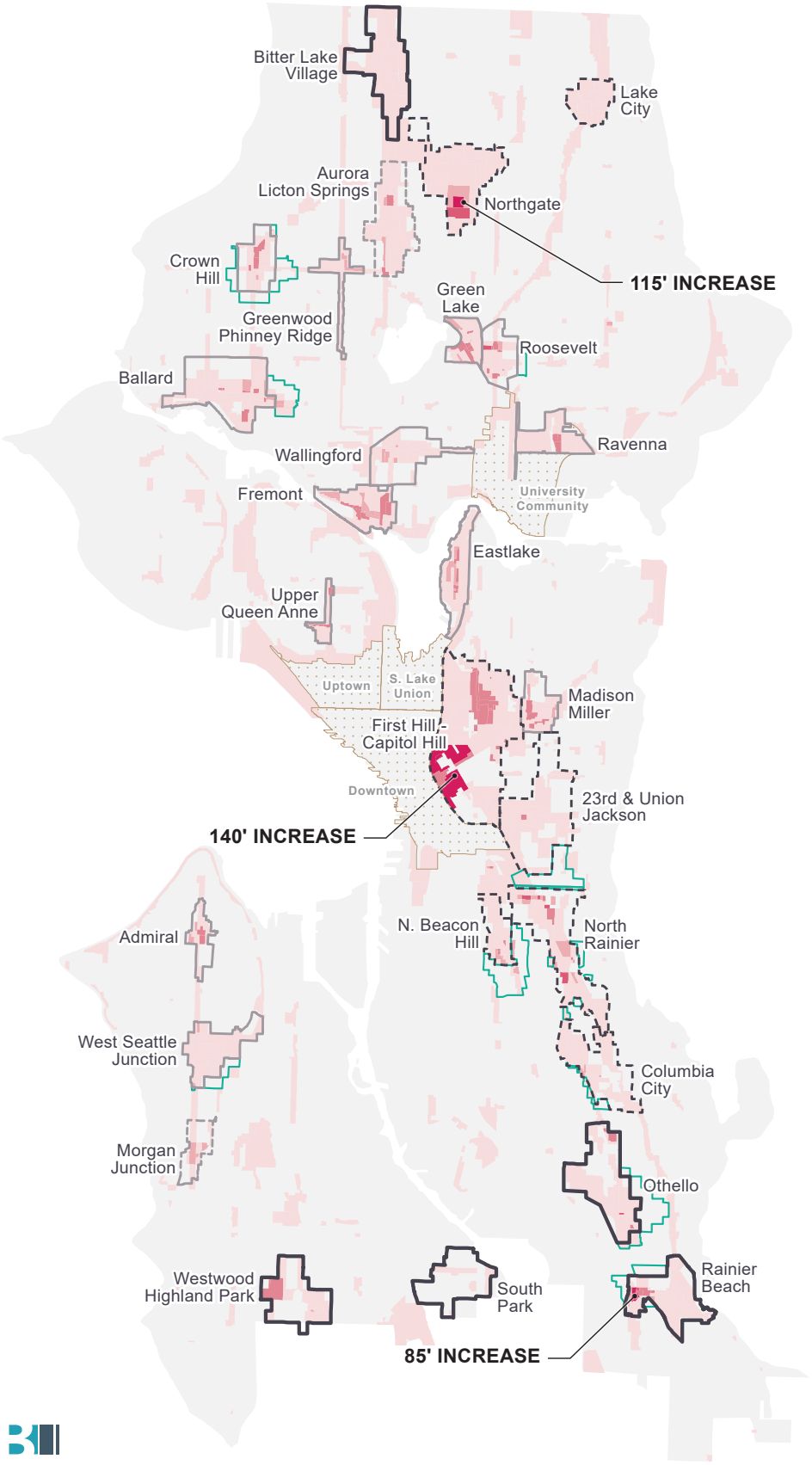

Exhibit 3.3–28
MHA Height Limit Changes—Preferred Alternative

Potential Expansion Areas, Preferred Alt.

Urban Centers/Villages, Displacement Risk and Access to Opportunity

- High Risk, Low Access
- High Risk, High Access
- Low Risk, High Access
- Low Risk, Low Access
- Outside MHA Study Area

Change in Maximum Buildable Height

- 5 to 15 ft
- 16 to 30 ft
- 31 to 45 ft
- 46 to 65 ft
- 66 ft or more

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

Height Increases

Exhibit 3.3–28 shows the distribution of height increases in the study area due to zoning changes and Land Use Code amendments under the Preferred Alternative. The greatest increases in allowed building height would occur in First Hill-Capitol Hill, Northgate, and Rainier Beach. Overall, greater increases in height limits would be concentrated in fewer locations compared to Alternatives 2 or 3, though the magnitude of these concentrated increases would be greater. The greatest height increases under the Preferred Alternative would be 140 feet (First Hill), 115 feet (Northgate) and 85 feet (Rainier Beach); the greatest height increases under Alternatives 2 and 3 would be 115 feet and 65 feet, respectively.

While these height increases are substantial, concentrating them in fewer locations would localize the impacts and allow for reduced height increases across the other urban villages. The locations targeted for large height increases under the Preferred Alternative are planned to be or are currently served by high-frequency transit. However, two of the most affected villages (Northgate and First Hill) are classified as having high risk of displacement and high access to opportunity. The third, Rainier Beach, is classified as having high displacement risk and low access to opportunity. The Preferred Alternative, however, would also create two new zones: Seattle Mixed—Northgate (SM-NG) and Seattle Mixed—Rainier Beach (SM-RB). Both of these new zones would include development regulations that encourage development near light rail to incorporate features identified as high priority during local community planning efforts in these areas.

The largest proposed height increase under the Preferred Alternative is associated with additional land use code changes proposed to the HR zone, described at the beginning of this section. The Preferred Alternative would increase the maximum height in the HR zone from 300 feet to 440 feet, 100 feet taller than would be allowed under Alternative 2 or Alternative 3, and would increase the maximum FAR from 14 to 15, which is the same FAR increase as Alternative 2 and 3. As described in Impacts Common to All Alternatives, increased building height can lead to significant aesthetic impacts on adjacent development and neighborhood character. Exhibit 3.3–29 and Exhibit 3.3–30 show examples of potential infill development in the Highrise multifamily (HR) zone under the standards proposed in the Preferred Alternative.

The First Hill urban village is currently the only area where the HR zone is applied, and would therefore also be the only location where MHA

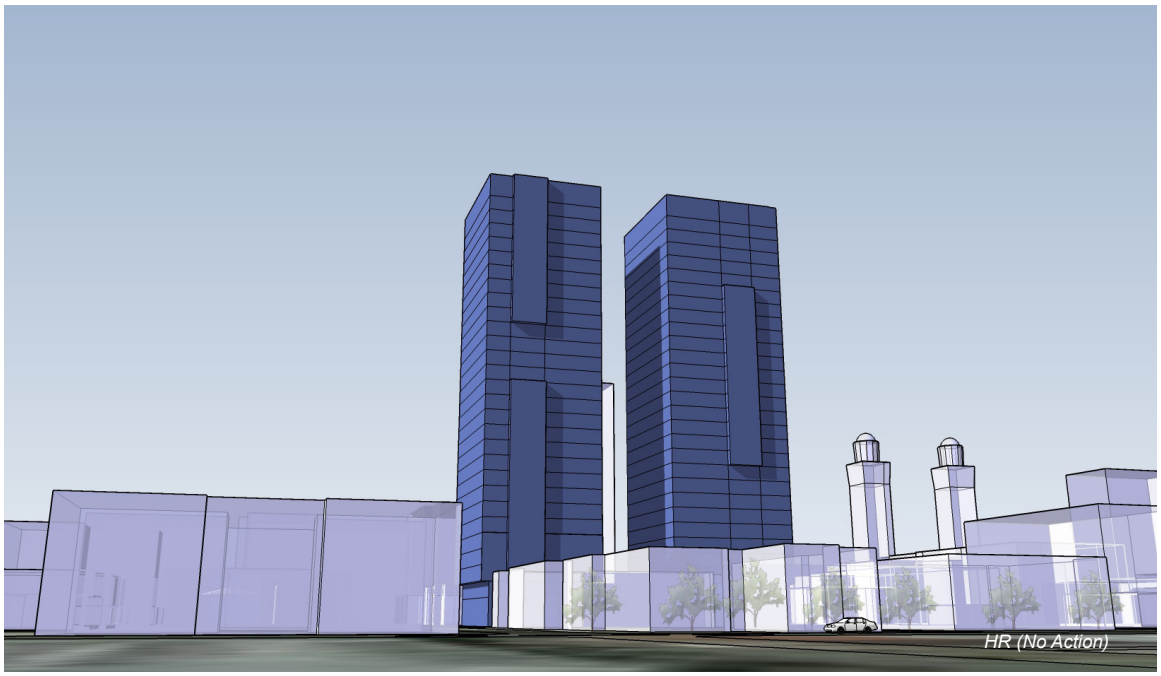

Exhibit 3.3–29
Highrise Residential Zoning, No Action

Source: City of Seattle, 2017.

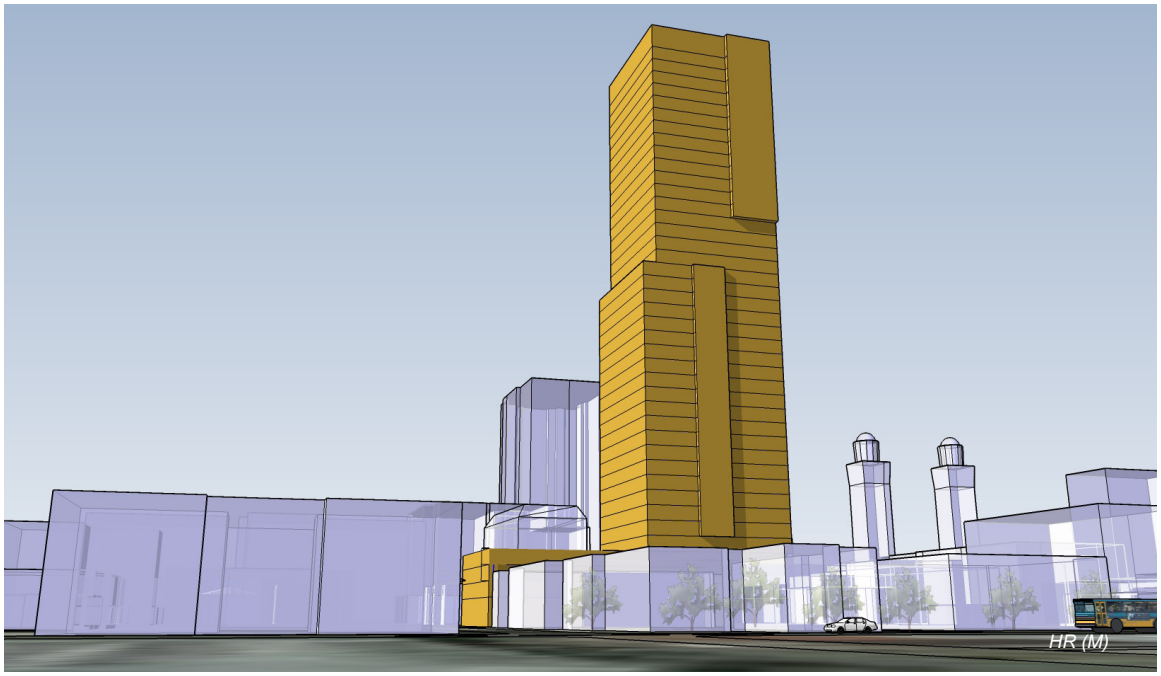

Exhibit 3.3–30
Highrise Residential (M) Infill Development

Source: City of Seattle, 2017.

Relevant urban villages include:

First Hill-Capitol Hill.

implementation in the HR zone would have an effect. Exhibit 3.3–29 shows potential infill development under existing regulations on a typical half-block site in First Hill, which would likely yield a two-tower development to maximize allowable floor area under the existing FAR limit of 14.0 and the current height limit of 300 feet. The two towers would be 28-stories/-300-foot tall towers on a single podium structure. Proposed MHA implementation under the Preferred Alternative would increase the allowed FAR in the MHA zone to 15, and increase the allowed height limit to 440 feet. The likely result, illustrated in Exhibit 3.3–30 would be a single 41-story tower that is 440 feet tall. Maximum floor plates under existing regulations are 12,000 square feet on average, compared to 10,000 square feet on average under the MHA Preferred Alternative scenario.

The Preferred Alternative would include several features to mitigate potential bulk and scale impacts resulting from increased heights in the HR zone. These include reduced limits on average and maximum floor plate sizes, which would result in more slender towers than under existing regulations. Proposed HR standards would also include a 60 percent limit on site coverage for portions of a structure over 45 feet in height. Maximum façade width for towers would also be reduced from 150 feet to 130 feet to reduce the bulk and scale of towers.

Residential Small Lot (RSL) Development Standards

Under the Preferred Alternative, the RSL zone would include new development standards applying a maximum 2,200 square-foot single dwelling unit size, and a new tree planting requirement. The expected aesthetic effect of the maximum dwelling unit size would be to produce more moderately sized single-unit structures than would occur in the zone without the limit. While it would still be possible for multiple units to be attached, resulting in buildings larger in total area than 2,200 square feet, it is expected that the development standard would reduce structure sizes for popular free-standing single-unit home structures compared to Alternative 2 and 3. The scale of such structures would be more consistent with a context of smaller-scale single family homes that are present in some areas the RSL zone would be implemented. The addition of a tree planting requirement on the site of RSL development would have the effect of providing more vegetative screening than would occur without the requirement. Due to these features, there are expected to be relatively fewer adverse aesthetic impacts in locations where the RSL zone is implemented under the Preferred Alternative compared to Alternative 2 or 3.

Urban Village Expansion Areas

As described under Impacts Common to All Alternatives, expansion of urban villages would introduce increased height and bulk and different building forms in existing single family areas, as lower-intensity development transitions to higher-intensity building types typical of urban villages. Alternative 3 would expand certain urban villages to reflect a mix of 5- and 10-minute walksheds around frequent transit. As described in Chapter 2, urban villages classified as having a high risk of displacement would have expansion areas consistent with 5-minute walksheds from transit nodes; urban villages classified as having low risk of displacement would have full 10-minute walkshed expansion areas. As a result, Alternative 3 would limit the aesthetic impacts of urban village expansion to a smaller area compared to Alternative 2.

View Obstruction and Shading Effects

Similar to the other action Alternatives, the precise nature and degree of potential impacts to protected views in locations with height increases would depend on specific site characteristics and the designs of individual construction projects. In addition, the increased heights allowed in the HR zone could significantly increase shading conditions on adjacent sites at certain times of day. However, the single tower structures promoted under the Preferred Alternative (Exhibit 3.3–30) could provide increased access to light and air due to the reduced bulk of a single tower compared with two towers. The single tower structure could also have equal or lesser impacts on view blockage from within other adjacent and nearby structures, because building mass would cover less of the site footprint at heights above the 45-foot podium. However, the increased height could have a greater impact on views in areas outside the immediate vicinity of the building. Taller structures are visible from greater distances, and the addition of 440-foot tall buildings in a hilltop area could alter the skyline composition, which would be perceptible from locations outside the First Hill neighborhood.

As applicable, project-level design review during the permit application process would include evaluations of views and shading impacts and provide an opportunity to define site-specific mitigation.

3.3.3 MITIGATION MEASURES

INCORPORATED PLAN FEATURES

The Action Alternatives include features intended to reduce the negative effects associated with increased development intensity, including the following proposed Land Use Code amendments:

- Requirements for upper-level setbacks in the amended Lowrise 2, Lowrise 3, Midrise, and Highrise zones;
- Requirements for upper-level setbacks in the new NC-55, NC-75, and NC-95 zones;
- Requirements for significant building modulation for building façades wider than 250 feet in Commercial and Neighborhood Commercial zones;
- Limiting building depth in MR zones to 80 percent of the lot depth;
- Implementation of side façade design standards in Lowrise 1, Lowrise 2, and Lowrise 3 zones—the standards would address the placement of windows on side façades to increase privacy and would require side façade modulation or color/material variation; ~~and~~
- Implementation of increased side and rear upper level setbacks in Neighborhood Commercial zones if adjacent to a residential zone;
- Modification of green factor landscaping requirements to place greater emphasis on ground-level landscaping and vegetation adjacent to public rights-of-way; and
- A lower design review threshold for a period of 5-years, to require design review for structures with 5,000 or more square feet, if the area is rezoned from single family.
- **Preferred Alternative:** Area-specific design standards within the new Seattle Mixed—Northgate (SM-NG) and Seattle Mixed—Rainier Beach (SM-RB) zones that are adjacent to existing or future light rail stations.
- **Preferred Alternative:** 2,200 square-foot maximum dwelling unit size limit in the RSL zone.
- **Preferred Alternative:** Tree planting requirement in the RSL zone using a point system that prioritizes preservation of existing trees and planting of large tree species.

REGULATIONS AND COMMITMENTS

- SMC 25.05.675.P establishes policies for the protection of public views, including views of major man-made and natural landmarks from specified public parks, viewpoints and scenic routes;
- SMC 25.05.675.Q establishes policies to protect open spaces from shading and shadow effects caused by development and preserve access to light and air; and
- Chapter 23.41 of the SMC establishes citywide requirements for Design Review.

OTHER POTENTIAL MITIGATION MEASURES

Aesthetic and urban design impacts could be further mitigated through implementation of the following or similar measures:

Development Character, Height, and Scale

- For high-rise tower-style development, locate the tallest portions of the building to reduce scale impacts relative to the most sensitive edges of the property. Applying lower height limits for the "pedestal" or "podium" portion of the building could maintain a lower-intensity appearance at street level and reduce bulk and scale impacts on the pedestrian environment;
- Through the Design Review process, incorporate ground-level open space or mid-block pedestrian connections to break up the bulk of buildings and reduce the occurrence of monolithic building forms;
- Through the Design Review process, promote slimmer building forms that minimize blockage of light and views; and
- Through the Design Review process, include streetscape improvements to create a streetscape with universal design that is welcoming to pedestrians, cyclists, and all users of the public realm.

Modifications to Design Review

As discussed in 3.3.1 Affected Environment, design review is required for certain types of development according to codified thresholds. ~~Aesthetic impacts could be mitigated by modifying design review thresholds to require design review for more types of development in the study area in locations that would be impacted by the proposal. For example, design review could be required for new multi-family developments in areas rezoned from single family, and in urban village expansion areas.~~ The design review process improvements adopted by City Council in October

of 2017 are an integrated part of this proposal, and include measures specifically intended to mitigate potential aesthetic impacts of MHA implementation in areas rezoned from single family zones.

Neighborhood Design Guidelines

As discussed in 3.3.1 Affected Environment, some but not all urban villages that the proposal would affect have neighborhood design guidelines. Working with neighborhood groups to create and codify neighborhood design guidelines could mitigate localized aesthetic impacts for urban villages that do not currently have them.

View Obstruction and Shading Effects

- Citywide, require preservation or replacement of existing streetscape vegetation along designated scenic routes to preserve and/or improve visual character; and
- Through the design review and/or site-level SEPA review process for proposed projects, require detailed shading/shadow and view studies for new development in areas where the proposed MHA height limit increase is 30 feet or more to protect streetscapes and public open spaces from excessive shading.

3.3.4 SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

Under all alternatives, additional growth would occur in the study area, leading to a general increase in building heights and development intensity over time, including the conversion of lower-intensity uses to higher-intensity uses as allowed by zoning. This transition is an unavoidable and expected characteristic of urban population and employment growth. The Action Alternatives would further this trend by creating additional development capacity, which could accelerate the development of taller, more intense buildings in the study area.

However, as described in 3.3.3 Mitigation Measures, the proposal includes a variety of features and development regulation amendments to minimize these impacts. In combination with the City's adopted development regulations, Design Review process, and the mitigation measures recommended in this EIS, aesthetic impacts should be reduced to less than significant levels. Therefore, no significant unavoidable adverse impacts are anticipated. In the urban context of a rapidly growing city, such changes are substantial but are also subjective in nature and are not necessarily significant impacts pursuant to SEPA. Nevertheless, some residents may perceive such changes as adverse.

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