

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.

3.5



HISTORIC RESOURCES.

This chapter provides analysis of potential impacts to historic resources and cultural resources in the study area. Historic and cultural resources exist belowground and aboveground and can be archaeological sites, buildings, structures, or objects. Historic and cultural resources can be designated/ listed, recommended eligible for listing, or determined eligible for listing on federal or local historic registers. Historic and cultural resources that are not listed or lack eligibility recommendation and determination can be qualified for consideration of their potential historic significance due to their age. In the City of Seattle, the minimum age threshold for a property to be considered historic is 25 years.

3.5.1 AFFECTED ENVIRONMENT

This section provides an overview of the study area's historic resources. Although it is recognized that each neighborhood in the study area has its own unique history and associated historic resources, it is not possible to provide a detailed history of each neighborhood within the citywide study area in a programmatic EIS of this scale. In addition to the fact that a more general level of detail is appropriate for a programmatic EIS, much of the information that would be required to provide a site-specific analysis is not available. The history of the study area provided here relies upon existing neighborhood-specific historic context statements, as available. The City has not conducted historic surveys or prepared historic context statements for all neighborhoods within the study area.

As a result, this section presents a broad discussion of the study area, focusing on the historic pattern of growth within Seattle as a whole, in order to provide indications of which urban villages have a higher likelihood to contain the oldest historic resources. While all urban villages contain resources that meet the minimum age threshold for consideration as a local landmark (25 years) or for listing in the National Register of Historic Places (50 years), older historic resources are more frequently eligible for listing on a

historic register due to rarity or associations with early Seattle residents and development. Beyond age, all of the urban villages likely contain resources that are associated with marginalized or under-represented immigrant communities, or racial and ethnic minority populations. These associations often contribute to a resource's historic eligibility. Some urban villages in the study area have a higher likelihood for containing these types of resources, for example the 23rd & Union-Jackson and Columbia City areas. Other areas, such as Licton Springs, have associations with the Duwamish people. Additionally, subsurface archaeological resources associated with Native American tribes and the history of Seattle exist throughout the study area and it is likely that additional archaeological resources exist that have not yet been identified.

Since first incorporated in 1869, Seattle has expanded over time through charter amendments and annexation (City of Seattle, 1986; Phelps, 1978). The historic pattern of development within the study area has generally been outward from the Central Business District, with the earliest neighborhoods developing in chartered expansion areas. These areas contain today's First Hill-Capitol Hill, 23rd & Union-Jackson, Eastlake, and Madison-Miller urban villages, which were added between 1869 and 1886.

By the 1890s, numerous small neighborhoods had formed outside of downtown, located along transportation routes and near commercial sites such as lumber mills (US Geological Survey, 1895). Following the establishment of a street car system, areas once considered remote became accessible and were soon platted for residential development. The City's first annexation occurred in 1891 when seven of today's designated urban villages were incorporated into city limits: Greenwood-Phinney Ridge, Fremont, Green Lake, Roosevelt, Upper Queen Anne, Wallingford, and University Community. In 1907 eleven more urban villages in the study area were annexed: Ballard, Ravenna, Columbia City, North Beacon Hill, North Rainier, Rainier Beach, South Park, and all of West Seattle (now the Admiral, Morgan Junction, and Westwood-Highland Park urban villages). Later annexations occurred in 1910, the 1940s, the 1950s, 1978, and 1986. The most recently annexed urban villages in the study area are Aurora-Licton Springs, Bitter Lake Village, Crown Hill, Northgate, and Lake City, all of which were annexed in the 1950s.

Some of Seattle's historic building fabric has been preserved through creation of historic districts. The City of Seattle's Historic Preservation Program manages eight designated Seattle historic districts: Ballard Avenue, Columbia City, Fort Lawton, Harvard-Belmont, International District, Pike Place Market, Pioneer Square, and Sand Point. These

districts overlap with the study area urban villages of Ballard, Columbia City, and First Hill-Capitol Hill. Proposed expansion areas are abutting the boundaries of Ballard Avenue, Columbia City, Harvard-Belmont, and Sand Point historic districts. The study area also contains individual historic properties that are designated Seattle Landmarks. These are located throughout the study area. However, not all properties within the study area have been systematically inventoried for their potential eligibility. Therefore, it is likely that the study area contains additional properties that could meet the criteria for designation as a Seattle Landmark.

There are seven National Register historic districts within the Urban Villages or proposed expansions areas. These are Ballard Avenue Historic District, Naval Air Station (Sand Point), Chittenden Locks and Lake Washington Ship Canal, Montlake Historic District, Lake Washington Boulevard, Harvard-Belmont District, and the Columbia City Historic District. There are additional National Register historic districts abutting the study area. The study area also contains historic properties that are listed in, and that have been determined eligible for listing in, the National Register of Historic Places (NRHP). ~~There are 111 properties that have been determined eligible; are show below in Exhibit 3.5-1 provides counts of these by urban village and Exhibit 3.5-2. These properties are located throughout the study area but occur mostly in the Low Displacement/ High Access and High Displacement/High Access urban villages, specifically Eastlake, First Hill-Capitol Hill, and Roosevelt. Some urban villages do not contain any determined eligible properties.~~ It is important to note that not all properties within the study area have been systematically inventoried for their potential eligibility. Therefore, it is likely that the study area contains additional properties that meet the criteria for being determined eligible for listing in the NRHP, but which have not yet been inventoried. ~~Alternative 2 and 3 contain nearly the same amount of total determined eligible properties, however the distribution of these among the urban village categories and proposed rezoning tiers differ by alternative.~~

The City had, until recently, an ongoing effort to conduct historic resource surveys by neighborhood and class of building and results are available in a City-managed database. Survey efforts began in the 1970s but were not systematically conducted until the 2000s. Currently, 11 neighborhoods in the study area have been systematically inventoried. In addition, a systematic survey has been completed of neighborhood commercial districts (Sheridan, 2002), residential properties built before 1906 (Lange and Veith, 2009), and City-owned properties (Wickwire, 2001) in the study area. These surveys added buildings to the database

Exhibit 3.5–1 NHRP Determined Eligible Historic Properties by Typology and Urban Village

New to the FEIS

FEIS Exhibit 3.5–1 combines DEIS Exhibits 3.5–1 and 3.5–2, and is new since issuance of the DEIS

Urban Village	Number of Resources Determined Eligible for listing in the National Register of Historic Places
High Displacement Risk & Low Access to Opportunity	
Bitter Lake Village	2
Othello	0
Rainier Beach	0
South Park	1
Westwood-Highland Park	0
Subtotal: 3	
Low Displacement Risk & High Access to Opportunity	
Admiral	0
Ballard	2
Crown Hill	0
Eastlake	18
Fremont	0
Green Lake	1
Greenwood- Phinney Ridge	2
Madison-Miller	2
Ravenna	0
Roosevelt	23
Upper Queen Anne	2
Wallingford	0
West Seattle Junction	0
Subtotal: 50	
High Displacement Risk & High Access to Opportunity	
23rd & Union-Jackson	3
Columbia City	4
First Hill-Capitol Hill	45
Lake City	0
North Beacon Hill	0
North Rainier	2
Northgate	1
Subtotal: 55	
Low Displacement Risk & Low Access to Opportunity	
Aurora-Licton Springs	0
Morgan Junction	3
Subtotal: 3	

Source: ESA, 2017.

from all of the urban villages in the study area with the exception of Lake City. While nearly all urban villages have properties listed in the database, 17 of the neighborhoods have yet to be systematically inventoried (Exhibit 3.5–4).

All of the study area urban villages and proposed expansion areas have been subject to redevelopment since their initial establishment. Some neighborhoods have changed more than others, such as First Hill which was composed of exclusive single-family residences during the 19th century and now features a mix of multi-family residences and commercial buildings (Nyberg and Steinbrueck, 1975). Other neighborhoods still retain aspects of their historic fabric such as Wallingford, which was noted to contain one of the City's best examples of the early twentieth century Craftsman bungalow neighborhoods (Sheridan, 2002). The completeness of the historic fabric for many of the urban village neighborhoods is discussed in the survey of neighborhood commercial buildings (Sheridan, 2002).

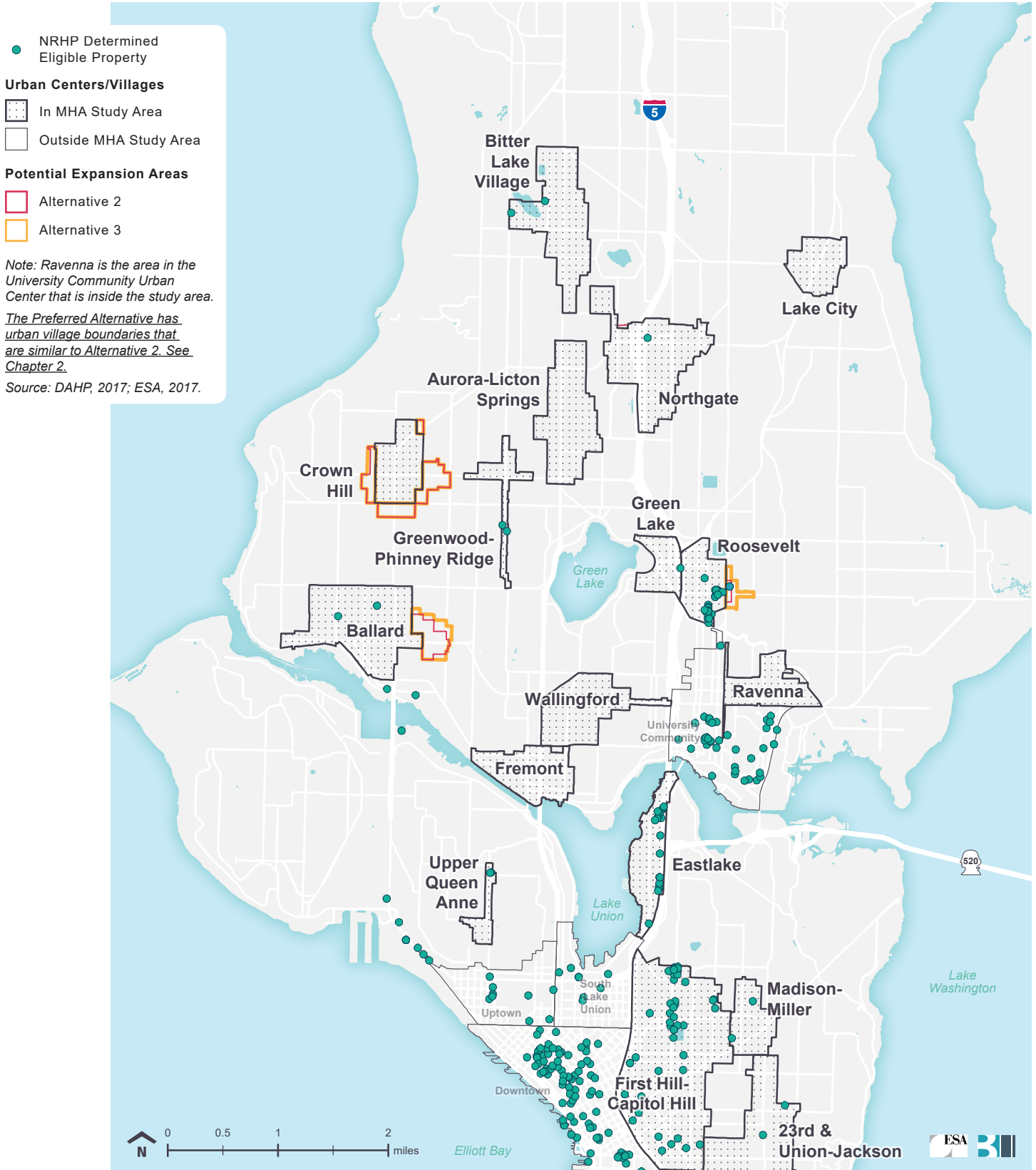


Exhibit 3.5-2 NRHP Determined Eligible Properties—North

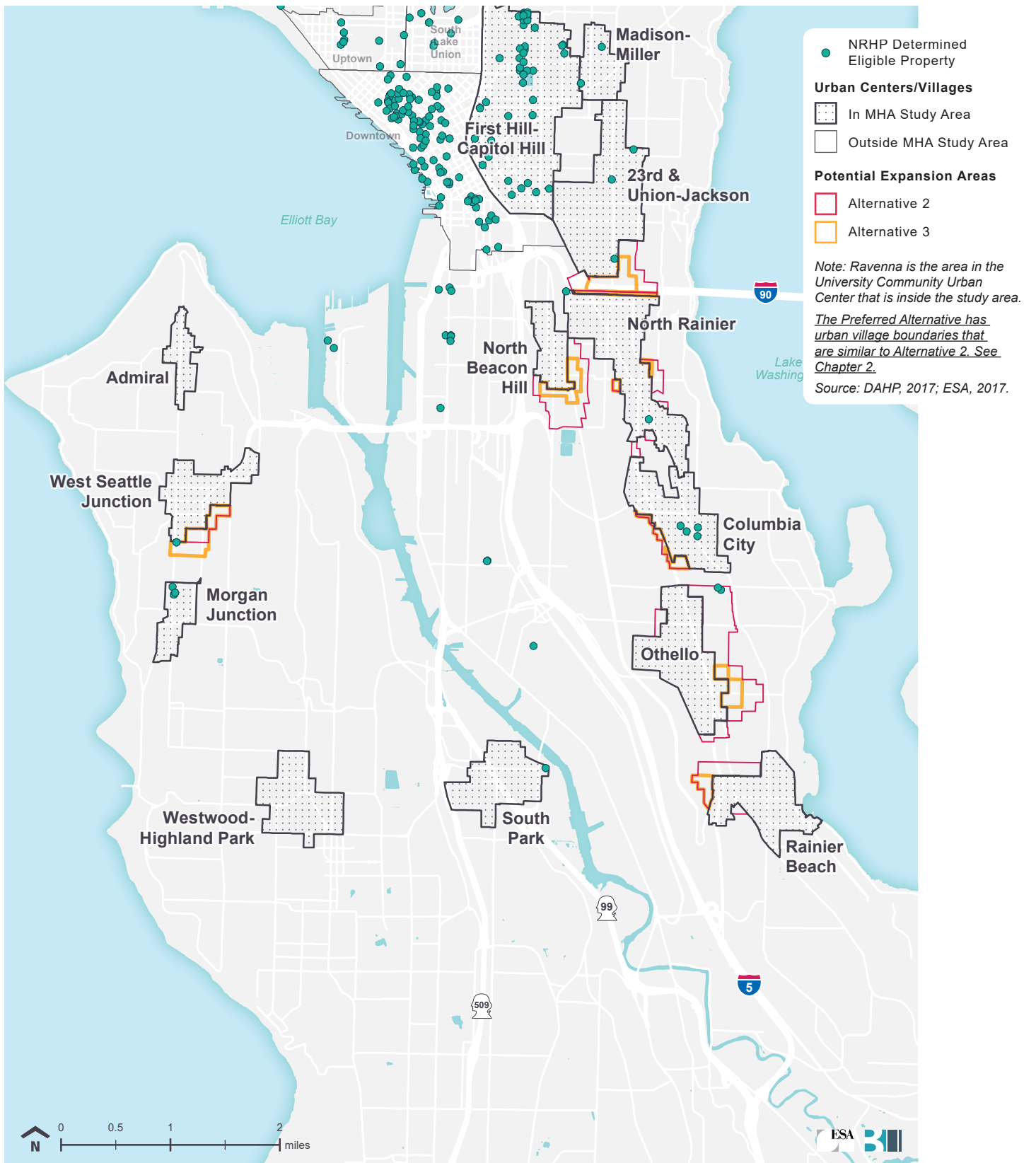


Exhibit 3.5-3 NRHP Determined Eligible Properties—South

Exhibit 3.5-4 Historic Resources Survey Status

Urban Village	Properties Listed in City Historic Resources Survey Database	Systematic Inventory Conducted	Historic Context Statement Prepared
23rd & Union-Jackson	X	X <i>(part of Central Area Survey)</i>	X
Admiral	X	—	
Aurora-Licton Springs	X	—	
Ballard	X	—	
Bitter Lake Village	X	—	
Columbia City	X	X	X
Crown Hill	X	—	
Eastlake	X	—	
First Hill-Capitol Hill	X	—	
Fremont	X	X	X
Green Lake	X	—	
Greenwood-Phinney Ridge	X	—	
Lake City	—	—	
Madison-Miller	X	X <i>(part of Central Area Survey)</i>	
Morgan Junction	X	—	
North Beacon Hill	X	X	
North Rainier	X	X	X
Northgate	X	—	
Othello/MLK @ Holly Street	X	—	
Rainier Beach	X	—	
Ravenna	X	—	
Roosevelt	X	—	
South Park	X	X	X
University Community	X	X	
Upper Queen Anne	X	X	X
Wallingford	X	X	X
West Seattle Junction*	X	X	X
Westwood-Highland Park	X	—	—

**Independent survey undertaken by West Seattle Junction Historical Survey Group.
Source: ESA, 2017.*

UNREINFORCED MASONRY BUILDINGS

All urban villages and proposed expansion areas contain Unreinforced Masonry buildings (URM). This is a common citywide building type, most often represented by a one-story brick-clad building with storefronts (Sheridan 2002). These buildings are often eligible for listing in a historic register and contribute to the historic character of neighborhoods. To date, seismic upgrades are required for URMs only when owners undertake large remodel projects. The City is considering a new policy regarding URMs; recommendations for the policy have been developed by City-sponsored URM Policy Committee. The policy would mandate seismic retrofitting over an extended time period. Objectives include preservation of historic landmarks, neighborhood character, and minimizing vacant or demolished buildings.

The Policy Committee submitted its final recommendations to the City on August 3, 2017. To date, the policy has not been adopted. The Policy Committee recommends excluding the retrofitting requirement for buildings that have brick veneer, concrete masonry, and are single-family and two-unit residences.

BELOWGROUND CULTURAL RESOURCES

The entire study area has varying sensitivity for containing intact belowground cultural resources. These resources can be associated with either the precontact era or historic era, or in some cases both. The Washington State Department of Archaeology and Historic Preservation maintains a Statewide Archaeological Predictive Model which can be used a starting point to assess risk for buried, intact cultural resources (DAHP, 2010). It is based upon several factors including proximity to water, other known archaeological resources, and slope. The model is limited to only precontact-era cultural resources.

The model classifies the study area as a range of risk levels, from Low to Very High. Generally, the urban villages nearest to the Puget Sound shorelines, streams, or lakes have a higher risk classification. While belowground historic-era cultural resources are not addressed by the Statewide Predictive Model, the urban setting of the study area is an indicator of a high sensitivity for containing these types of cultural resources.

3.5.2 IMPACTS

The MHA program would not directly impact any historic or cultural resources, but development allowed by the MHA program could impact these resources indirectly by affecting decisions to demolish or redevelop historic-aged properties or construct new properties on land that may contain belowground cultural resources. The estimated growth rates under the Alternatives are indicators of potential impacts to historic and cultural resources. Areas with a higher growth rate have the potential for more redevelopment than areas with lower projected growth rates. Potential growth rates under Alternative 2 and Alternative 3 could result in the same average potential rate of 39 percent, however the potential growth rate for each urban village differs under the Alternatives. For this analysis, potential significant impacts will be defined as potential growth rates of 50 percent or greater than the potential growth rates under the No Action Alternative (see Chapter 2, Exhibit 2–8). While potential growth rates less than 50 percent could still result in impacts to historic-aged properties and belowground cultural resources, the amount of growth within each urban village could potentially result in less impact to the overall historic fabric of an urban village.

In addition to growth rates, proposed rezoning changes have the potential to impact historic-aged resources and belowground cultural resources through increasing the allowable capacity within rezoned areas, which could introduce changes in the scale of the urban villages. Redevelopment and demolition of historic-aged resources could occur within M, M1, and M2 rezoning tiers, if projects are undertaken in these areas and projects involve historic-aged resources. Areas rezoned M have the potential for scale increases; however, these increases would allow less of a change than within areas rezoned M1 and M2. Areas rezoned M1 would allow increases into the next highest zone category, which would mean greater increases in allowable scale, and areas rezoned M2 would allow capacity increases of two or more zone categories, which would be the greatest possible increase in scale.

IMPACTS COMMON TO ALL ALTERNATIVES

Redevelopment, demolition, and new construction projects could occur in the study area as a result of all Alternatives; these projects could impact historic resources or result in ground disturbance. Any ground disturbance could impact belowground cultural resources, if present. However, existing policies and regulations regarding review of historic and cultural resources would not change under any Alternative. For

development projects within the study area that would be subject to SEPA, potential impacts to historic and cultural resources would still be considered during project-level SEPA review. Potential impacts to historic and cultural resources would still be considered for projects subject to Washington State Executive Order 05-05 and Section 106 of the National Historic Preservation Act.

None of the Alternatives propose zoning changes within the boundaries of the eight designated Seattle historic districts or within the seven National Register historic districts that are located within and are abutting the study area. Zoning changes are proposed in areas abutting several historic districts, as listed above. These changes may have indirect impacts on historic districts if buildings are demolished or redeveloped adjacent to, or across the street from, these boundaries. For projects subject to SEPA, demolition or substantial modifications to buildings over 50 years in age that are adjacent or across the street from designated Seattle Landmarks are subject to review for their potential adverse impacts on the designated landmark (SMC 25.05.675H). Potential future impacts to newly-created historic districts would be considered at an individual basis at the time of designation.

Potential impacts to historic resources could occur from demolition, redevelopment that impacts the character of a historic property, or development adjacent to a designated landmark if the development alters the setting of the landmark and the setting is a contributing element of that landmark's eligibility. Redevelopment could result in a significant adverse impact for properties that have the potential to be landmarks if the regulatory process governing the development does not require consideration of that property's potential eligibility as a Seattle Landmark, such as projects exempt from review under SEPA. For example, projects with fewer than 20 residential units, or that have less than 12,000 square feet of commercial space, are exempt from SEPA review.

Typical SEPA-exempt projects that could occur under the project would be redevelopment or replacement of single-family residences and small buildings with slightly larger residences and buildings. Alternatives 2, and 3, and the Preferred Alternative propose increased development capacity through standard increases; a standard increase is defined in Chapter 2 as increases to the maximum height limit, typically the addition of one story, and increases to the Floor Area Ration (FAR). In some locations other standards such as maximum density or minimum lot size would be adjusted to allow for additional capacity. These increases have the potential to result in changes to the historic scale of neighborhoods.

Potential decreases to the historic fabric of a neighborhood are likely to occur if historic buildings are redeveloped or demolished and new buildings are constructed that are not architecturally sympathetic to the existing historic characteristics of a neighborhood. As a neighborhood's historic fabric decreases, it is less likely to meet local and federal eligibility criteria for consideration as a historic district. For projects subject to SEPA, demolition or substantial modifications to buildings over 50 years in age that are adjacent or across the street from designated Seattle Landmarks are subject to review for their potential adverse impacts on the designated landmark (SMC 25.05.675H). When reviewing the project, the Landmarks preservation Board uses the Secretary of Interior Standards as guidelines. If adverse impacts are identified, mitigation measures may be required. Measures could include sympathetic façade, street, or design treatment or reconfiguring the project and/or location of the project.

It is possible that historic and cultural resources that are significant to racial and ethnic minority populations and immigrant communities could be impacted. Communities with marginalized and/or immigrant populations may have lower participation in government processes, such as SEPA review or formation of neighborhood design guidelines. Therefore, existing protections for cultural and historic resources that are of particular importance to racial and ethnic minority populations and immigrant communities may not be as effective as they are for historic and cultural resources of particular importance to other populations and communities.

It is possible that some historic structures, including commercial or residential structures, contain relatively affordable spaces. Older housing or commercial spaces that do not conform to contemporary preferences for configurations or amenities may command lower rents relative to newly constructed buildings. Therefore preservation of historic structures can in some instances provide affordability benefit.

All Alternatives anticipate residential and commercial growth in all urban villages and proposed expansion areas. The average projected growth rate under Alternatives 2 and 3 is the same across the study area (39 percent) however anticipated growth rates for individual urban villages differ. The average projected growth rate under the Preferred Alternative is slightly less (38 percent); however anticipated growth rates for individual urban villages differ among all EIS alternatives. For the proposed expansion areas outside of urban villages, the same estimated growth rate is anticipated under Alternatives 2, ~~and 3,~~ and the Preferred Alternative (24 percent).

Two urban villages are projected to have housing growth rates above 50 percent under the Preferred Alternative and both Alternative 2 and Alternative 3: Morgan Junction and Crown Hill. Both neighborhoods contain historic-aged buildings and URMs. The Preferred Alternative projects a higher growth rate than Alternative 2 but a lower growth rate than Alternative 3.

Under the Preferred Alternative, the housing growth rate in Crown Hill is estimated to increase by 108 percent versus 61 percent under Alternative 2 and 155 percent under Alternative 3.

Alternative 2 projects the lowest housing growth rate for both urban villages. Under Alternative 2, the housing growth rate in Crown Hill is estimated to increase by 61 percent versus 155 percent under Alternative 3. For Morgan Junction, the Preferred Alternative estimates the housing growth rate will increase by 112 percent versus 87 percent under Alternative 2 and 172% under Alternative 3. 2 estimates the housing growth rate will increase by 87 percent versus 172 percent under Alternative 3.

Under all Alternatives, current City regulations for renovations to URMs require seismic upgrades for large renovation projects. Seismic retrofitting could result in an adverse impact to a historic resource through changes to the exterior façade, however the result would likely improve the resource's longevity and structural stability. A new policy that would mandate seismic retrofitting over an extended time period is currently being considered, and could possibly influence whether some affected properties redevelop. Requirements for seismic retrofitting would be a cost to owners of URM structures. MHA implementation on the site of a URM structure would also be a cost to owners when the structure is expanded or when more housing units are added within the structure. When an existing amount of commercial square footage or housing is maintained within the retrofit of a structure there would be no additional cost due to MHA. In cases where MHA applies to renovation of a URM structure it is possible that the combination of URM retrofit costs and MHA affordable housing requirements and costs could affect the financial decision by property owners about whether to renovate or modify URM structures. However, the positive revenue potential due to allowance for an additional story or additional floor area in a URM structure due to MHA implementation could also spur a property owner decision to renovate and prolong the life of a URM structure. Implementation of MHA on URM sites along with other sites would provide parity in MHA requirements, which would avoid the creation of an indirect and unintentional incentive encouraging redevelopment of URM sites.

IMPACTS OF ALTERNATIVE 1 NO ACTION

Alternative 1 would not implement the MHA program and there would be no increase in development capacity, but would include the same growth estimate, resulting in an addition of 70,000 households based on the Seattle 2035 Comprehensive Plan growth boundaries. Under Alternative 1, redevelopment, demolition, and new construction projects could occur in the study area. These projects may be exempt from project-level SEPA review, which could result in impacts to historic and cultural resources, if present and no other regulation requiring consideration of impacts to historic and cultural resources applies to the project.

IMPACTS OF ALTERNATIVE 2

Alternative 2 estimates 10 urban villages will have a housing growth rate of over 50 percent more than could under Alternative 1 (Exhibit 3.5–5). The growth rates for these 10 urban villages range between 51 percent and 87 percent with an average of 63.6 percent estimated housing growth rate. The 10 urban villages are 23rd & Union-Jackson, Columbia City, Crown Hill, First Hill-Capitol Hill, Morgan Junction, North Beacon Hill, Northgate, Othello, South Park, and Westwood-Highland Park. Of

Exhibit 3.5–5 Urban Villages with 50% or Greater Estimated Housing Growth Under Alternatives 1 and 2

Urban Village	Estimated Housing Growth Under Alternative 1*	Estimated Housing Growth Under Alternative 2	Systematic Inventory Conducted
23rd & Union-Jackson	1,600	2,668 (67%)	Yes <i>(part of Central Area Survey)</i>
Columbia City	800	1,205 (51%)	Yes
Crown Hill	700	1,128 (61%)	No
First Hill-Capitol Hill	6,000	10,283 (71%)	No
Morgan Junction	400	746 (87%)	No
North Beacon Hill	400	712 (78%)	Yes
Northgate	3,000	4,526 (51%)	No
Othello/MLK @ Holly Street	900	1,361 (51%)	No
South Park	400	646 (62%)	Yes
Westwood-Highland Park	600	939 (57%)	No

*Presented in housing units estimated under the Comprehensive Plan.

Source: Chapter 2, Exhibit 2–7 and Exhibit 2–8.

these, the oldest urban villages are 23rd & Union-Jackson and First Hill-Capitol Hill. These are likely to contain the oldest buildings, however all of the urban villages contain buildings 25 years or older, which qualify for consideration as potential historic resources. Systematic inventories have been conducted for four of the 10 urban villages.

IMPACTS OF ALTERNATIVE 3

Alternative 3 estimates eight urban villages will have a housing growth rate of over 50 percent greater than could under Alternative 1 (Exhibit 3.5–6). The growth rate for these eight urban villages ranges between 56 percent and 172 percent with an average of 102.75 percent estimated housing growth rate. Four of those have estimated growth rates over 100 percent. The urban villages over 50 percent are: Admiral, Crown Hill, Eastlake, Fremont, Green Lake, Madison-Miller, Morgan Junction, and Wallingford. Of these, the oldest urban villages are Eastlake and Madison-Miller. These are likely to contain a higher number of older buildings than the others which were incorporated in 1891 or later. However, all of the urban villages contain buildings 25 years or older, which qualify for consideration as potential historic resources. Systematic inventories have been conducted for three of the eight urban villages.

Exhibit 3.5–6 Urban Villages with 50% or Greater Estimated Housing Growth Under Alternatives 1 and 3

Urban Village	Estimated Housing Growth Under Alternative 1*	Estimated Housing Growth Under Alternative 3	Systematic Inventory Conducted
Admiral	300	467 (56%)	No
Crown Hill	700	1,784 (155%)	No
Eastlake	800	1,482 (85%)	No
Fremont	1,300	2,050 (58%)	Yes
Green Lake	600	1,218 (103%)	No
Madison-Miller	800	1,488 (86%)	Yes <i>(part of Central Area Survey)</i>
Morgan Junction	400	1,086 (172%)	No
Wallingford	1,000	2,066 (107%)	Yes

*Presented in housing units estimated under the Comprehensive Plan.

Source: Chapter 2, Exhibit 2–7 and Exhibit 2–8.

IMPACTS OF THE PREFERRED ALTERNATIVE

New to the FEIS

Impacts of the Preferred Alternative, including Exhibit 3.5–7, is a new section since issuance of the DEIS

The Preferred Alternative estimates seven urban villages will have a housing growth rate of over 50 percent greater than could occur under Alternative 1 (Exhibit 3.5–7). The growth rates for these seven urban villages range between 54 percent and 112 percent with an average of 86.43 percent estimated housing growth rate. Two have estimated growth rates over 100 percent. The urban villages over 50 percent are: Crown Hill, Fremont, Green Lake, Madison-Miller, Morgan Junction, North Beacon Hill, and Wallingford. Of these, the oldest urban village is Madison-Miller, followed by Fremont, Green Lake, and Wallingford. These older urban villages are likely to contain a higher number of older buildings than the others which were incorporated in 1907 or later.

However, all of these urban villages contain buildings 25 years or older, which would qualify for consideration as potential historic resources. Systematic inventories have been conducted for four of the seven urban villages.

Exhibit 3.5–7 Urban Villages with 50% or Greater Estimated Housing Growth Under Alternative 1 and the Preferred Alternative

Urban Village	Estimated Housing Growth Under Alternative 1*	Estimated Housing Growth Under Preferred Alternative	Systematic Inventory Conducted
Crown Hill	700	1,455 (108%)	No
Fremont	1,300	2,003 (54%)	Yes
Green Lake	600	1,087 (81%)	No
Madison-Miller	800	1,533 (92%)	Yes <i>(part of Central Area Survey)</i>
Morgan Junction	400	849 (112%)	No
North Beacon Hill	400	651 (63%)	Yes
Wallingford	1,000	1,947 (95%)	Yes

*Presented in housing units estimated under the Comprehensive Plan.

Source: Chapter 2, Exhibit 2–7 and Exhibit 2–8.

3.5.3 MITIGATION MEASURES

Proposed and existing Mitigation measures that would ~~to~~ reduce potential impacts to historic and cultural resources include:

- Existing Comprehensive Plan policies that promote new development consistent with the historic character of the neighborhood.
- City regulations including the Seattle City Landmark process and archaeological surveys per the Seattle Municipal Code.
- Funding continuation of the City-initiated comprehensive historic survey and inventory work that ~~was begun~~ began in 2000 to prepare neighborhood historic context statements and identify historic-aged buildings and potential historic districts.
- Funding City-led thematic historic context inventories that focus on marginalized or underrepresented immigrant communities and preparing thematic context statements relating to those resources.
- Considering potential impacts to historic resources during development review specifically that are associated with marginalized or underrepresented immigrant communities as part of project level SEPA review, or during the design review process.
- Funding City-initiated proactive landmark nominations for properties and potential historic districts identified in new neighborhood surveys.
- Prioritizing City funding for retrofitting Unreinforced Masonry (URM) buildings to those properties that meet eligibility requirements for designation as a landmark or for listing in the National Register of Historic Places.
- Establishing new historic districts to preserve the historic fabric a neighborhood.
- Establishing new conservation districts in order to encourage preservation of older structures (referred to in SMC as “character structures”).
- Establishing Transfer of Development Rights (TDR programs within new conservation districts to provide incentives for property owners to keep existing character structures.
- Incorporate development standards in MHA implementation that ensure incentives for preservation in the existing Pike/Pine Conservation Overlay District are maintained.

- Adding regulatory authority to identify resource-specific mitigation before demolition occurs.
- Requiring project proponents to nominate buildings for landmark review when demolition of properties that are over 50 years old is proposed, regardless of City permitting requirements, by modifying the SEPA exemptions thresholds in the Seattle Municipal Code at Table A for section 25.05.800, and Table B for section 25.05.800.

~~Other mitigation measures could include conducting additional systematic neighborhood surveys to identify historic-aged buildings and potential historic districts; establishing new historic districts to preserve the historic fabric of a neighborhood; establishing new conservation districts such as the City's Pike/Pine Conservation District in order to limit the size of new development and encourage preservation of older structures (referred to in SMC as "character structures"); establishing Transfer of Development Rights (TDR) programs within new conservation districts to provide incentives for property owners to keep existing character structures; and requiring that any structure over 25 years in age that is subject to demolition, including those undergoing SEPA-exempt development, is assessed for Landmark eligibility, and adding regulatory authority to identify resource-specific mitigation before demolition occurs.~~

UNREINFORCED MASONRY BUILDINGS

~~If seismic retrofitting is required, Proposed mitigation measures specific to reducing potential impacts to unreinforced masonry buildings include: could be mitigated through~~

- Prioritizing City investments of affordable housing funds, and/or other public capital investments, for retrofitting Unreinforced Masonry (URM) buildings to those properties that meet eligibility requirements for designation as a landmark or for listing in the National Register of Historic Places.
- Requiring adherence to the Secretary of the Interior's Standards for the Treatment of Historic Properties which provides guidance on retaining a building's historic character (Weeks and Grimmer 1995).

3.5.4 SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

Since no changes will occur to existing policies and regulations regarding review of historic and cultural resources under any alternative, projects subject to review under existing policies and regulations would still be reviewed at the project level, if and when redevelopment is proposed. Potential impacts, therefore, are avoidable. Since review at the project level is a basis for mitigating potential impact of the proposal to a non-significant level, implementation of a combination of the mitigation measures listed would be required to fully avoid indirect significant impacts to historic resources. At the general programmatic level of the analysis in this programmatic EIS, no significant unavoidable direct impacts to historic and cultural resources are anticipated under any of the proposed alternatives.



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