

SEPA ENVIRONMENTAL CHECKLIST

A. Background

1. Name of proposed project, if applicable:

Affordable Housing on Religious Organization Property

2. Name of applicant:

City of Seattle Office of Planning and Community Development

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

Office of Planning and Community Development

700 5th Ave, Suite 2000

Seattle, WA 98104

Contact: Nick Welch, (206) 684-8203

4. Date checklist prepared:

February 8, 2021

5. Agency requesting checklist:

City of Seattle Department of Construction and Inspections

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

Approval by City Council and Mayor anticipated in the second quarter of 2021.

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

No.

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

The Office of Planning and Community Development (OPCD) issued a Final Environmental Impact Statement (FEIS) for Mandatory Housing Affordability (MHA) in November 2017. This EIS evaluated increases in development capacity associated with a proposed inclusionary housing requirement. The EIS studied zoning changes on properties in multifamily and mixed-use zones that would be affected by this proposed but generally did not contemplate zoning changes properties in single-family zones that would be affected by this proposal. For some properties studied in the MHA EIS, additional increases in development capacity were studied beyond what was ultimately implemented through MHA legislation, and these may resemble the height and floor area increases in the current proposal. The relevant sections of the MHA EIS were consulted as part of this analysis, including exhibits in Section 3.2 — Land Use and Section 3.3 — Aesthetics.

In 2018, the City issued a Final EIS for land use policy changes related to accessory dwelling units (ADUs) in single-family zones. This EIS evaluated potential indirect adverse impacts on transportation, parking, and public services and

utilities in single-family areas resulting from greater residential densities over time. Relevant sections of this ADU EIS were consulted as part of this analysis, including Section 4.4 — Parking and Transportation, Section 4.5 — Public Services and Utilities, and Appendix B — Parking Analysis Methods and Assumptions.

Appendix A to this checklist is a Directors' Report prepared by OPCD that provides parcel-level analysis and urban design scenarios.

9. Do you know whether applications are pending for governmental approvals of other proposals directly affecting the property covered by your proposal? If yes, explain.

Organizations whose property could be eligible for the provisions in this proposal have development permit applications pending before the City. The proposals are for long-term, income-restricted affordable housing located on property owned or controlled by religious institutions.

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

Approval of an ordinance by the Seattle City Council.

11. Give brief, complete description of your proposal, including the proposed uses and the size of the project and site. There are several questions later in this checklist that ask you to describe certain aspects of your proposal. You do not need to repeat those answers on this page. (Lead agencies may modify this form to include additional specific information on project description.)

The proposal is a non-project action that would implement a suite of land use code changes in zones throughout Seattle to support development of affordable housing on property owned or controlled by a religious organization. Increases in maximum height and floor area limits and changes to other development standards would allow additional development of long-term, income-restricted affordable housing on property that meets certain eligibility criteria. These changes would fulfill requirements in Substitute House Bill 1377, passed by the Washington State Legislature in 2019, amending 35.63 RCW, 35A.63 RCW, 36.70A RCW, and 44.28 RCW.

This additional development potential would be available for construction of affordable housing on properties owned or controlled by religious institutions in all zones that allow residential use, subject to several criteria. All housing developed with these provisions, whether rental or ownership, would be reserved for households whose incomes are at or below 80 percent of area median income (AMI) for at least 50 years. This affordability term would apply even if the property is no longer owned by a religious organization.

The specific changes in development standards would vary by zone, as summarized in the tables below and detailed further in Appendix A. In most zones, the primary code changes would be to maximum height and floor area ratio (FAR) limits, two key development standards that regulate the amount of development allowed on a site. Where applicable, the proposal would increase maximum density limits to allow more housing units on a given site. Certain amounts of floor area devoted to certain uses — such as family-size housing, religious facility, and preservation or adaptive reuse of landmark structures — would be exempt from FAR calculations.

In certain circumstances, the proposal would allow uses not otherwise allowed or allowed only as conditional uses under existing zoning in order to accommodate activities, functions, and services commonly performed by religious institutions.

Multifamily Residential, Commercial, and Neighborhood Commercial zones

Zone	Current standards		Proposed standards for affordable housing on property owned or controlled by a religious organization		Floor area exempt from FAR if located in urban village or near frequent transit ¹	
	Height (feet)	FAR	Height (feet)	FAR	FAR amount	
Multifamily Residential zones						
LR1	30	1.3	40	1.5	Up to 0.3	
LR2	40	1.4-1.6	50	1.8	Up to 0.3	
LR3	<i>Outside UV</i>	40	1.8	55	2.5	Up to 0.5
	<i>Inside UV</i>	50	2.3	65	3.25	Up to 0.5
MR	80	4.5	95	5.0	Up to 0.5	
HR	440	15	480	16	Up to 1.0	
Commercial and Neighborhood Commercial zones						
NC-30 / C-30	30	2.5	55	3.25	Up to 0.5	
NC-40 / C-40	40	3.0	75	4.5	Up to 0.5	
NC-55 / C-55	55	3.75	85	5.25	Up to 0.5	
NC-65 / C-65	65	4.5	95	5.75	Up to 0.5	
NC-75 / C-75	75	5.5	95	5.75	Up to 0.5	
NC-85 / C-85	85	5.75	145	7.0	Up to 1.0	
NC-95 / C-95	95	6.25	145	7.0	Up to 1.0	
NC-145 / C-145	145	7.0	200	8.0	Up to 1.0	
NC-200 / C-200	200	8.25	240	9.0	Up to 1.0	

In multifamily and mixed-use zones, the proposal would allow additional development potential primarily through increases in maximum height and FAR limits. In most zones, the proposal would allow one to three additional stories of development compared to existing standards. Zones with this degree of change represent the majority of land area where multifamily and mixed-use development is allowed in Seattle. In some zones with higher current height limits, the proposal would allow four to six additional stories. No reductions in setback or design requirements are proposed.

In multifamily residential zones, small ground-floor commercial spaces would be allowed, subject to existing standards for Residential–Commercial zones in SMC Chapter 23.46, which include limits on the size of the space, signage requirements, and noise standards. This change could allow an office associated with the religious institution that owns the property; small retail, like a corner grocer; arts and cultural space; or other small-scale commercial uses.

In Commercial and Neighborhood Commercial zones, the proposal would increase height and FAR limits for affordable housing development and provide an FAR exemption available for certain uses and in certain locations, as described above. Some of the additional FAR would be available only for development that exceeds the current height limit.

- For zones with height limits under 85 feet, the height limit would increase by two or three stories. For development that does not exceed the current height limit, 0.5-1.0 additional FAR would be available, depending on the zone. The remaining additional FAR would be available only for developments that exceed the current height limit.
- For zones with current height limits of 85 and 95 feet, the proposal would allow development up to 145 feet. The maximum floor area limit would increase to 7.0 FAR, with up to 1.0 FAR exempt for certain uses and

¹ Floor area exempt for certain uses: family-size housing, religious facility use, or adaptive reuse or preservation of existing landmark or historic structure.

subject to locational criteria. For development that does not exceed the current height limit, up to 1.0 additional FAR would be available; the remaining increase in FAR would be available only for development that exceeds the current height limit. Development above 85 feet is subject to building code provisions that require higher-cost steel and concrete construction, which could affect the likelihood that development projects maximize this additional height.

- In zones that already allow tower development of 14-20 stories, the proposal would allow up to 4-6 additional stories of development.
- In all Commercial and Neighborhood Commercial zones, an upper-level setback of at least 8 feet would apply for any street-facing portion of a structure that exceeds the current height limit. This would be in addition to the existing 8-foot upper-level setback required in these zones for portions of a structure that exceed 75 feet in height.

Single-family zones

Zone	Eligibility for additional development potential ²		Current standards			Proposed standards for affordable housing on property owned or controlled by a religious organization		
	Type of use	Minimum site area	FAR	Density	Lot coverage	FAR	Density	Lot coverage ³
SF 5000, SF 7200, SF 9600	Religious facility or other use associated with a religious facility on or abutting the site	10,000 square feet	0.5	1 unit per 5,000-9,600 sq. ft.	Lots 5,000 sq. ft. and larger: 35 percent Lots under 5,000 sq. ft.: 1,000 sq. ft. + 15 percent of lot area	1.0	1 unit per 1,500 sq. ft.	50 percent
RSL	All property owned or controlled by a religious organization		0.75	1 unit per 2,000 sq. ft.	50 percent	1.2	1 unit per 1,200 sq. ft.	65 percent

In single-family zones, the proposal would modify maximum density and FAR limits to allow construction of additional housing units in a form and at a scale similar what is allowed under existing zoning. In Residential Small Lot (RSL) zones, the proposed changes for affordable housing would be available on all property owned or controlled by a religious organization. The proposal would increase the maximum floor area limit from 0.75 FAR to 1.2 FAR and allow one housing unit per 1,200 square feet of lot area. The lot coverage limit would increase from 50 percent to 65 percent. No changes are proposed to yard requirements or the existing 35-foot maximum height limit, so while additional affordable housing units could be created under the proposal, the scale of development would resemble what is allowed under current standards.

In SF 5000, SF 7200, and SF 9600 zones, the proposed changes to allow more affordable housing would be limited to sites that 1) have or abut a religious facility use or other use associated with or accessory to a religious facility, or 2) are at least 10,000 square feet in area if the site does not have a religious facility use. Under the proposal, these sites could develop to a maximum FAR of 1.0, an increase from the current limit of 0.5. The proposal would allow one home per 1,500 square feet of lot area.

² In SF zones, either criterion (type of use or minimum site area) would make a site eligible for the proposed provisions.

³ Increase in lot coverage available only for development that does not exceed 25 feet in height.

Siting and clustering requirements would apply to limit where structures could be located on the property with respect to neighboring lots. In addition to existing yard requirements, which would continue to apply, dwelling units would be not allowed within 10 feet of any lot line or 20 feet of a lot line of an abutting single-family-zoned lot. A maximum façade length limit of 40 feet would apply within 20 feet of a lot line of an abutting single-family-zoned lot.

Except for certain large sites described below, no increase is proposed in existing maximum height limits of 35 feet for single-family zones. Development would be limited to 25 feet in height if exceeding the existing lot coverage limits of 35 percent and 50 percent up to the proposed maximums of 50 percent and 65 percent for SF and RSL zones, respectively.

Large sites in single-family zones

For large sites in SF and RSL zones owned by religious organizations and meeting certain criteria, the proposal would allow additional development capacity beyond the standards described above for long-term income-restricted affordable housing. These provisions would facilitate affordable housing on sites in single-family zones where factors like proximity to frequent transit, proximity or adjacency to higher-scale zones, or the site's size or locational characteristics provide infrastructure, access, and scale compatibility that would be suitable to accommodate greater residential density.

Criteria for using these provisions would include development of 100 percent affordable housing, lot area of at least 10,000 square feet, a current use of a religious facility or another use directly associated with a religious facility, proximity to frequent transit service or an urban village boundary, and close proximity to a larger-scale or higher-intensity zone. Sites whose lot lines are all located at least 50 feet from a single-family dwelling unit would also be eligible if not located close to a higher-intensity zone.

In these situations, additional increases in maximum height, FAR limits, and density limits to facilitate additional construction of affordable housing could be allowed. In SF zones, these increases would not exceed an upper limit of at most a height of four stories and FAR of 2.0. In RSL zones, these increases would not exceed an upper limit of at most a height of five stories and FAR of 2.5.

Seattle Mixed and Downtown zones

Development type	Proposed standards for affordable housing on property owned or controlled by a religious organization	
	Height limit increase	FAR increase
Development with height limits up to 85 feet	Up to 20 feet	Up to 1.5
Development with height limits greater than 85 feet	Up to 40 feet	Up to 3.0

While most property owned by religious institutions is located in the zones described above, some sites are located in Seattle Mixed (SM) and Downtown zones. About two percent of land owned by religious organizations is located in SM zones, and two percent in Downtown zones. This amounts to about 10 acres in total.

SM zones are located primarily in South Lake Union, the U District, and Uptown, with smaller SM areas in North Rainier and Interbay/Dravus. Development standards in these areas and in Downtown vary substantially zone to zone, with some zones regulated primarily by height, some by FAR, and others by floor plate size limits or setback

requirements. Further, zones that allow highrise tower development typically include distinct height limits for the podium and tower portions of the structure.

Given the variety and complexity of development standards in SM and Downtown zones, the proposal may allow additional density for affordable housing on religious organization-owned sites through a more generalized relative increase in height and floor area limits. For the purposes of environmental review, this analysis considers increases in height and floor area limits of up to 20 feet and up to 1.5 FAR for development where the current applicable height limit is 85 feet or less, and up to 40 feet and 3.0 FAR for zones where the current applicable height limit is greater than 85 feet.

Split-zoned sites

On eligible religious organization-owned lots located in two or more zones, the proposal would allow the development standards of the most intensive zone to be applied to any portion of the lot that comprises 30 percent or less of the total lot area, provided that no portion of the lot is located in a single-family zone. This could result in structures that are taller, have more floor area, and contain more housing units than would otherwise be allowed under existing zoning and the provisions described above. The setback requirements of the zone would continue to apply for any lot line that abuts a residentially zoned lot. Based on an analysis of parcels owned by religious organizations, this flexibility would apply on only approximately 10 split-zoned sites, only some of which would meet the 30 percent lot area threshold mentioned earlier.

12. Location of the proposal. Give sufficient information for a person to understand the precise location of your proposed project, including a street address, if any, and section, township, and range, if known. If a proposal would occur over a range of area, provide the range or boundaries of the site(s). Provide a legal description, site plan, vicinity map, and topographic map, if reasonably available. While you should submit any plans required by the agency, you are not required to duplicate maps or detailed plans submitted with any permit applications related to this checklist.

The proposed Land Use Code changes would affect properties located throughout Seattle in many different zones. The analysis in Appendix A shows that properties currently owned by religious organizations are located in many zones and across all Seattle neighborhoods. Many sites and much of the land area these organizations currently own are located in single-family zones. See Appendix A for detail by zone on the location, number, and land area of religious organization-owned sites.

Religious organizations own property currently in use as a religious facility as well as property with other uses, such as accessory parking, residential, office, or school. The proposal would generally allow additional development potential on all such properties. The proposal would also allow additional development potential if eligible religious institutions acquire and seek to redevelop other property in the future.

B. Environmental Elements

1. Earth

a. General description of the site:

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

This is a non-project action that does not pertain to a specific site. The proposal would affect properties located throughout Seattle. The land that would be affected by the proposal — property owned or controlled by a religious organization — has a wide range of topographic conditions, including hilly areas and steep slopes.

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

This is a non-project action that does not pertain to a specific site. Properties affected by the proposal are found throughout Seattle, including areas with identified steep slopes that exceed 40%. Future development related to the proposal that would disturb the ground in areas with a steep slope would be subject to review under the City's environmentally critical areas (ECA) regulations.

c. What general types of soils are found on the site (for example, clay, sand, gravel, peat, muck)? If you know the classification of agricultural soils, specify them and note any agricultural land of long-term commercial significance and whether the proposal results in removing any of these soils.

This is a non-project action that does not pertain to a specific site. Properties affected by the proposal could include a range of soil types. Soil in Seattle varies and is mostly glacial in nature. There is no prime farmland within the city's boundaries. The proposal could affect properties that include unstable soils and other ECAs. The proposal is not likely to result in a significant adverse increase in the removal of soils, though future development related to the proposal in some cases could result in additional grading of soils. Analysis of soil conditions and any site-specific potential impacts resulting from future development will occur through project-level development review.

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

As a non-project action, this proposal does not pertain to a specific site and would affect development and use of property throughout Seattle, including in areas where unstable soils are present. Analysis of any site-specific potential impacts would occur through project-level development review. Development on property with unstable soils would be regulated by the City's existing ECA regulations. See also responses in Section D of this checklist for further discussion of potential impacts on the natural environment.

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

This proposal is a non-project action. No filling, excavation, or grading is proposed at this time. It is not likely that the proposal would significantly adversely increase the amount of filling, excavation, or grading associated with future development related to this proposal. Grading, excavation, and fill outcomes would relate to project-specific characteristics of future affordable housing development related to this proposal. In some cases, incremental more grading, excavation, and fill could result if future development is larger or occupies more site area than would otherwise occur.

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

This proposal is a non-project action. No clearing or construction is proposed. Analysis of any site-specific potential impacts would occur through project-level development review. See also responses in Section D of this checklist for further discussion of potential impacts on the natural environment.

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

This is a non-project action that does not pertain to a specific site. No construction or development is directly proposed that would result in impervious surfaces. Analysis of any site-specific potential impacts would occur through project-level development review. See also responses in Section D of this checklist for further discussion of potential impacts on the natural environment.

The proposal would allow additional development on certain sites throughout Seattle, but in most zones no changes are proposed to development standards affecting lot coverage, setbacks, or impervious surfaces. In multifamily residential zones, affordable housing development on eligible sites could be taller and include more floor area and housing units, but no changes are proposed to setback requirements that determine the maximum footprint and coverage of structures on the site. In mixed-use zones, the same is true. In single-family zones, the proposal would allow up to 50 percent lot coverage, which could result in increases in impervious surfaces in future development compared to development under current standards, which generally limit lot coverage to 35-45 percent of lot area.

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

No measures proposed, other than compliance with applicable codes and requirements. See also responses in Section D of this checklist for further discussion of potential impacts on the natural environmental and possible mitigation measures (as applicable).

2. Air

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

This is a non-project action. No construction, operation, or maintenance of a project is directly proposed that would result in emissions to air.

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

No. See responses in Section D of this checklist for further discussion of potential impacts on the natural environment.

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

None proposed. See also responses in Section D of this checklist for further discussion of potential impacts on the natural environmental and possible mitigation measures (as applicable).

3. Water

a. Surface Water:

- 1) Is there any surface water body on or in the immediate vicinity of the site (including year-round and seasonal streams, saltwater, lakes, ponds, wetlands)? If yes, describe type and provide names. If appropriate, state what stream or river it flows into.**

This is a non-project action that does pertain to a specific site. No construction or site alteration is proposed. The proposal could encourage future development on sites throughout Seattle, including sites near water bodies, including Lake Washington, Puget Sound, Green Lake, Lake Union, and the Duwamish River. Development in these areas would be subject to regulations in Seattle's Shoreline Master Program. See also responses in Section D of this checklist for further discussion of potential impacts on the natural environment.

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

Such work in or over water would not be required or probable with future development related to this proposal, though in unusual circumstances possible future development might occur near the described waters, in which case the regulations of the Shoreline Master Program would apply. According to data from the King County Assessor, none of the parcels currently owned by religious organizations is located within the Shoreline District (i.e., within 200 feet of designated waterbodies).

3) Estimate the amount of fill and dredge material that would be placed in or removed from surface water or wetlands and indicate the area of the site that would be affected. Indicate the source of fill material.

No fill or dredge material is likely to be placed in or removed from surface water or wetlands with future development related to this proposal.

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

Surface water withdrawals or diversions is not likely to occur as a result of future development related to this proposal.

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

No such future development site within a 100-year floodplain is probable with future development related to this proposal.

6) Does the proposal involve any discharges of waste materials to surface waters? If so, describe the type of waste and anticipated volume of discharge.

This is a non-project action that does pertain to a specific site. No construction, fill, dredging, or site alteration is proposed at this time. Further, no discharges of waste materials, such as sewage or polluted discharges (as distinguished from stormwater runoff from a given site), are probable from future development related to this proposal. See also responses in Section D of this checklist for further discussion of potential impacts on the natural environment.

b. Ground Water:

1) Will groundwater be withdrawn from a well for drinking water or other purposes? If so, give a general description of the well, proposed uses and approximate quantities withdrawn from the well. Will water be discharged to groundwater? Give general description, purpose, and approximate quantities if known.

No.

2) Describe waste material that will be discharged into the ground from septic tanks or other sources, if any (for example: Domestic sewage; industrial, containing the following chemicals. . . ; agricultural; etc.). Describe the general size of the system, the number of such systems, the number of houses to be served (if applicable), or the number of animals or humans the system(s) are expected to serve.

This is a non-project action that does pertain to a specific site. No construction is proposed at this time. Further, no discharges of waste materials to groundwater are probable from future development related to this proposal. See also responses in Section D of this checklist for further discussion of potential impacts on the natural environment.

c. Water runoff (including stormwater):

1) Describe the source of runoff (including storm water) and method of collection and disposal, if any (include quantities, if known). Where will this water flow? Will this water flow into other waters? If so, describe.

This is a non-project action that does not pertain to a specific site. No construction or site alteration is proposed. Stormwater runoff from future development related to this proposal would be regulated by and controlled consistent with City codes, which could involve drainage either to City sewer utility facilities or to natural surface drainages where present as part of a stormwater drainage pathways. These pathways and facilities would vary throughout the city according to the location of future development.

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

See the responses to Questions 3.a.6 and 3.b.2 above.

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

No. This is a non-project action that does pertain to a specific site. No construction is proposed at this time. Future development related to this proposal would be regulated by the Stormwater Code to provide required stormwater controls and facilities that would influence runoff patterns from such future development. In most cases, the proposal would result in taller buildings with a similar footprint as otherwise allowed. Outside single-family zones, no change in coverage or setback requirements is proposed; in single-family zones, the proposed increase in lot coverage could result in incrementally more impervious surface and water runoff. In certain cases, the proposal would result in larger development than allowed under current regulations, which could trigger Stormwater Code requirements that otherwise wouldn't apply.

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

None proposed. See responses in Section D of this checklist for further discussion of potential impacts on the natural environment and possible mitigation measures (as applicable).

4. Plants

Check the types of vegetation found on the site:

- deciduous tree: alder, maple, aspen, other: cottonwoods, willow, etc.
- evergreen tree: fir, cedar, pine, other: spruce, hemlock, etc.
- shrubs
- grass
- pasture
- crop or grain
- orchards, vineyards or other permanent crops.
- wet soil plants: cattail, buttercup, bullrush, skunk cabbage
- water plants: water lily, eelgrass, milfoil
- other types of vegetation: various other vascular, avascular, native, and non-native plant species

A wide variety of typical tree, shrub, and grass vegetation suited to Seattle's urban environment is present throughout the city. The geographic area affected by the proposed non-project action is certain parcels in zones that allow residential uses. Various native and non-native plant and vegetation species are present in the Seattle area. The Puget Sound basin is home to diverse plant species that depend on marine, estuarine, freshwater, and terrestrial environments. Vegetation in Seattle includes upland forest (deciduous, coniferous, and mixed), shrublands, riparian forests, and wetlands. Flora include species native to the region and many non-native species. As a densely developed urban area, Seattle has few remaining areas of native vegetation and high-quality habitat. Remaining fragments of high-quality native vegetation are found primarily in parks and open space. Plants found in Seattle's urban and

suburban environment are native and non-native species that tolerate or benefit from habitat degradation and disturbance.

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

This non-project proposal does not include any construction or development that would alter or remove vegetation. Potential impacts of future development projects related to this proposal would be addressed through regulation and/or project-specific environmental review.

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

None known. No federally designated endangered or threatened or State-listed sensitive plant species are known to occur within Seattle. Most of the city has experienced substantial development and redevelopment over the last 100 years. Original vegetation in the area has been extensively cleared, excavated, filled, paved, or occupied by streets and built structures.

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

No landscaping or use of native plants are proposed at this time because the proposal is a non-project action that would affect the uses and types of development allowed on parcels throughout Seattle. Potential impacts of future development projects related to this proposal would be addressed throughout regulation and/or project-specific environmental review. Future development related to this proposal would continue to be subject to existing landscaping requirements. In many zones where the proposed provisions would apply, future development would be required to fulfill Green Factor landscaping requirements that increase the amount and improve the quality of landscaping in new development. In certain cases, the proposal could result in a type or amount of development that triggers Green Factor requirements that would not otherwise apply, which could at least partially offset impacts on landscaping and vegetation.

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

The proposed non-project action would affect the uses and development allowed on parcels throughout Seattle and does not pertain to a specific site. Many species of noxious and invasive species are present in the Seattle. For example, see the noxious weed lists of the King County Noxious Weed Board at <https://www.kingcounty.gov/services/environment/animals-and-plants/noxious-weeds/laws/list.aspx>.

5. Animals

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

Examples include:

birds: hawk, heron, eagle, songbirds, other: osprey, bald eagle, peregrine falcon, purple martin, various species of owl, pileated woodpecker, belted kingfisher, waterfowl species, Canada goose, starling, and pigeon
mammals: deer, bear, elk, beaver, other: miscellaneous and diverse species, such as squirrel, opossum, sea lion, river otter, muskrat, raccoon, and rat
fish: bass, salmon, trout, herring, shellfish, other: perch, rockfish, etc.

A wide variety of animal species suited to Seattle's urban environment is present throughout the city. The proposed non-project action would affect the uses and types of development of allowed on parcels throughout the city in zones that allow residential uses. Many species of birds, mammals, and fish are present in this geographic area. Generally, the Puget Sound basin is home to diverse animal species that depend on marine, estuarine, freshwater, and terrestrial

environments. Fauna include species native to the region and many non-native species. As a densely developed urban area, Seattle has few remaining areas of native vegetation and high-quality habitat. Remaining fragments of high-quality native vegetation are found primarily in parks and open space. Wildlife found in Seattle's urban and suburban environment are native and non-native species that tolerate or benefit from habitat degradation and close association with humans.

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

This is a non-project action that does not pertain to a specific site and affects the uses and development allowed on parcels throughout Seattle. Five species found in King County are listed as endangered or threatened under the Endangered Species Act (ESA), but they are unlikely to be found in Seattle: Canada lynx (*Lynx Canadensis*; threatened), gray wolf (*Canis lupus*; endangered), grizzly bear (*Ursus arctos*; endangered), marbled murrelet (*Brachyramphus marmoratus*; threatened), and northern spotted owl (*Strix occidentalis caurina*; threatened). King County has federally designated critical habitat for marbled murrelet and northern spotted owl, but this habitat is located outside Seattle. Bald eagle (*Haliaeetus leucocephalus*), which are known to reside in Seattle, was removed from the federal list under ESA on August 8, 2007, but remains federally protected under the Bald and Golden Eagle Protection Act.

Fish species listed as endangered or threatened under the ESA and found in freshwater tributaries of Puget Sound include Chinook salmon (*Oncorhynchus tshawytscha*, threatened), steelhead (*O. mykiss*, threatened), and bull trout (*Salvelinus confluentus*, threatened). Coho salmon (*O. kisutch*) is a candidate species for listing as threatened. These species all reside in or near the geographic area affected by the proposed non-project action. Lake Washington contains federally designated critical habitat for bull trout and Chinook salmon. Because much of Seattle has been previously developed and the original habitats significantly altered or eliminated, the potential for threatened or endangered animal species to be present in Seattle is low.

It is conceivable that protected, threatened, or endangered species could be present on or near future development sites. The most likely affected animals would be heron and salmon, to the extent that they could be present near or in downstream locations potentially affected by future development related to this proposal.

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

This is a non-project action that does not pertain to a specific site and affects the uses and development allowed on parcels throughout the city. The Puget Sound region is an important migratory route for many animal species. Portions of the geographic area affected by the proposed non-project action could provide migratory corridors for bald eagles travelling to and from foraging areas in Puget Sound and Lake Washington. Marbled murrelets travel through Seattle between marine waters and their nests in late successional and old growth forests in the Cascades. Bull trout, steelhead, and salmon (Chinook, chum, pink, coho) use the Puget Sound nearshore. Chinook, coho, and sockeye salmon use Lake Washington and Lake Union as migration corridors. Anadromous trout and salmon migrate through the Seattle area river and stream systems, including urban streams in Seattle. Seattle is also within the Pacific Flyway, a flight corridor for migrating waterfowl, migratory songbirds, and other birds that encompasses the entire Puget Sound basin and extends from Alaska to Mexico and South America.

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

None proposed.

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

This is a non-project action that does pertain to a specific site but would affect the uses and type of development allowed on parcels throughout Seattle. Many invasive animal species are found in the greater Seattle area. Invasive species known to be present in Seattle and King County include European starlings, house sparrows, Eastern gray squirrels, nutria, rat, pigeon, New Zealand mud snail, Asian gypsy moth, domestic cats, and domestic dogs.

6. Energy and Natural Resources

a. What kinds of energy (electric, natural gas, oil, wood stove, solar) will be used to meet the completed project's energy needs? Describe whether it will be used for heating, manufacturing, etc.

The proposal is a non-project action that would affect the uses and types of development allowed on parcels throughout Seattle. The proposal does not involve heating, manufacturing, etc. because it does not directly propose construction or development that would require energy to operate. Development in Seattle typically relies on electricity, natural gas, oil, and solar energy for heating and other resource needs. Potential impacts from future development projects related to this proposal would be addressed through regulation and/or project-specific environmental review.

See also Section D of this checklist for additional discussion of potential impacts to energy and natural resources.

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

The proposed non-project action does not include any construction or development that would affect potential use of solar energy by adjacent properties. The proposal could indirectly affect use of solar energy by allowing different uses and types of development on parcels owned or controlled by religious organizations. In certain cases and in certain zones, some structures in multifamily and mixed-use zones could be larger and/or taller as a result of the proposal than otherwise allowed under existing development standards. This could affect the potential use of solar energy by adjacent properties. This impact would be relatively minor, infrequent, and confined to a limited number of religious organization-owned sites eligible for the proposed provisions. Potential impacts on solar energy use of future development projects related to this proposal would be addressed through regulation and/or project-specific environmental review.

c. What kinds of energy conservation features are included in the plans of this proposal? List other proposed measures to reduce or control energy impacts, if any:

The proposed non-project action does not include any energy conservation features or other measures to reduce or control energy impacts. Potential impacts on energy use and energy conservation of future development projects related to this proposal would be addressed through regulation and/or project-specific environmental review.

7. Environmental Health

a. Are there any environmental health hazards, including exposure to toxic chemicals, risk of fire and explosion, spill, or hazardous waste, that could occur as a result of this proposal? If so, describe.

No. This is a non-project action that does not include construction or development that could result in environmental health hazards, exposure to toxic chemicals, risk of fire and explosion, spill, or hazardous waste.

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

The proposal is a non-project action that does not propose any construction or development at this time that would encounter possible site contamination. Potential impacts of future development projects related to this proposal would be addressed through regulation and/or project-specific environmental review.

2) Describe existing hazardous chemicals/conditions that might affect project development and design. This includes underground hazardous liquid and gas transmission pipelines located within the project area and in the vicinity.

The proposal is a non-project action that does not propose any construction or other activity that would cause or involve exposure to hazardous chemicals or conditions. While it is possible that future development related to this proposal might involve existing site contamination from past uses, the proposal does not intend to accommodate residential

uses in ways that are particularly exposed to uses that have or are near hazardous or toxic materials or transmission facilities. The proposal does not allow residential use in any zone or on any site where it is not otherwise allowed under existing land use regulations. Exposure and proximity to hazardous chemicals and conditions would be more likely to occur in Industrial and Commercial 2 zones that allow more intensive and impactful commercial and manufacturing uses. Potential risks from exposure to hazardous chemicals or conditions associated with future development projects related to this proposal would be addressed through regulation and/or project-specific environmental review.

3) Describe any toxic or hazardous chemicals that might be stored, used, or produced during the project's development or construction, or at any time during the operating life of the project.

The proposal is a non-project action that does not include any development or construction at this time that would involve the storage, use, or production of toxic or hazardous chemicals. Potential impacts of future development projects related to this proposal would be addressed through regulation and/or project-specific environmental review.

4) Describe special emergency services that might be required.

The proposal does not require any special emergency services. Future development related to the proposal is likely to be served by existing emergency services. The proposal does not intend to encourage or allow residential uses in ways that require special emergency services. Potential impacts of future development projects related to this proposal would be addressed through regulation and/or project-specific environmental review.

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

None proposed. The proposed non-project action has no associated environmental health hazards.

b. Noise

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

This is a non-project action that does not pertain to a specific site and does not directly propose construction or development that be affected by noise. Future development related to this proposal could occur on sites throughout Seattle, some of which may be near sources of elevated levels of noise, such as major arterials, highways, and other high-volume roadways that cause noise from vehicles.

2) What types and levels of noise would be created by or associated with the project on a short-term or a long-term basis (for example: traffic, construction, operation, other)? Indicate what hours noise would come from the site.

The proposal is a non-project action that does include any construction, development, or activity that would generate noise. Potential sources of noise resulting from future development projects related to this proposal would be addressed through regulation and/or project-specific environmental review.

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

None proposed. This is a non-project action that does not include construction or development at this time and that would not itself generate noise. The proposal could encourage future development with noise levels that likely would be consistent with construction, operation, and daily use noise levels of multifamily residential buildings in urban areas. Potential impacts from future development projects related to this proposal would be addressed through regulation and/or project-specific environmental review.

8. Land and Shoreline Use

a. What is the current use of the site and adjacent properties? Will the proposal affect current land uses on nearby or adjacent properties? If so, describe.

The proposal is a non-project action that does not pertain to a specific site and does not propose construction or development at this time. The proposal would allow affordable housing development in zones that already allow residential use. The affected area includes properties owned or controlled by religious organizations. As described in Appendix A, current uses vary on religious organization-owned parcels. On more than 60 percent of such parcels, the current use is a religious facility. Other uses include office, retail, and school. Current uses on properties adjacent to religious institutions also vary widely. In residential zones, religious facilities are often surrounded by housing.

The proposed non-project action would generally maintain the uses already established and allowed under current land use rules and would not affect land uses for nearby or adjacent properties, except that, in Lowrise Multifamily zones, the proposal would allow small-scale commercial uses that are otherwise not allowed under existing regulations. See further discussion of impacts on land use compatibility and development patterns in Section D of this checklist.

b. Has the project site been used as working farmlands or working forest lands? If so, describe. How much agricultural or forest land of long-term commercial significance will be converted to other uses as a result of the proposal, if any? If resource lands have not been designated, how many acres in farmland or forest land tax status will be converted to nonfarm or nonforest use?

The proposal is a non-project action that does not pertain to a specific site. Agriculture was a historic use on some parcels within Seattle but is not currently present in the city.

1) Will the proposal affect or be affected by surrounding working farm or forest land normal business operations, such as oversize equipment access, the application of pesticides, tilling, and harvesting? If so, how:

No.

c. Describe any structures on the site.

The proposal is a non-project action that affects the uses and types of development allowed on certain parcels throughout Seattle. Various structures are present on parcels currently owned or controlled by religious organizations that would be affected by the proposal, ranging from small detached houses and single-story commercial buildings to larger-scale residential and mixed-use structures and, most commonly, religious facilities.

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

The proposal is a non-project action to amend regulatory code requirements that affect the uses and types of development allowed on certain parcels throughout Seattle. No construction or development is proposed at this time that would directly lead to demolition of structures. Future affordable housing development related to this proposal could result in the demolition of existing structures, though it is anticipated that such development would sometimes occur on undeveloped portions of land owned by religious organizations. See Section D for further discussion of potential land use impacts related to the proposal.

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

The proposed legislation would amend land use and development regulations in all zones that currently allow residential use. This includes zones in the following categories:

- SF 5000

- SF 7200
- SF 9600
- Residential Small Lot
- Lowrise Multifamily
- Midrise Multifamily
- Highrise Multifamily
- Neighborhood Commercial
- Commercial
- Seattle Mixed
- Downtown

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

Current Comprehensive Plan designations vary for sites affected by the proposal. As detailed in Appendix A, religious organization-owned sites currently exist throughout most zones in Seattle. Roughly half of parcels owned by religious organizations and about 30 percent of land area are located in urban villages with a Future Land Use Map (FLUM) designation of Residential Urban Village, Hub Urban Village, or Urban Center. Half of parcels and about 70 percent of land area are located outside urban villages. Many sites outside urban villages have a FLUM designation of Single-Family Residential. Others are designated as Multifamily Residential or Commercial / Mixed-Use. Zoning for the various properties relevant to this proposal is described in the proposal description in response to Section A, Question A.11. See also Section D for further discussion of potential impacts on land use patterns.

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

The proposal is a non-project action that affects the uses and types of development allowed on parcels throughout Seattle, including in the following shoreline environments: Conservancy Recreation (CR), Urban Commercial (UC), Urban General (UG), Urban Harborfront (UH), Urban Maritime (UM), and Urban Residential environments.

No changes are proposed to shoreline master program regulations.

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

Yes, the affected area would include lands classified as environmentally critical areas (ECAs). All existing ECA regulations would continue to apply and would regulate any future development on sites that intersect ECAs. No changes are proposed to current ECA regulations. Further discussion of potential impacts to ECAs is found in Section D of this checklist.

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

The proposal is a non-project action that affects the uses and types of development allowed on parcels throughout Seattle. Future development related to this proposal would include primarily residential uses on a limited number of eligible sites owned or controlled by religious organizations. It would be speculative to estimate the number of people who could come to reside in such development over time.

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

The proposal is a non-project action that affects the uses and types of development allowed on parcels throughout Seattle. Most property currently owned by religious organizations does not have a current use of housing. Future affordable housing development related to this proposal would therefore be unlikely to lead to significant levels of

displacement of existing residential uses. See also further discussion of displacement and housing impacts in Section D of this checklist.

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

The proposal does not directly result in housing development but would encourage construction of long-term affordable housing.

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

To ensure compatible outcomes where nonresidential uses would be present as part of future development, standards for commercial uses in Residential–Commercial zones, which address land use and scale relationships between residential and nonresidential uses, would apply to small-scale commercial uses that the proposal would allow in multifamily residential zones. See further discussion of potential land and shoreline use impacts from this non-project proposal, and relationship to City plans and policies, in the response to Question D.5 in Section D of this checklist.

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

None proposed.

9. Housing

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

The proposal is a non-project action that does not include construction or development of housing at this time. Future development related to the proposal would primarily include residential uses, and all housing development under the proposed provisions would be reserved for low-income households with incomes under 80 percent of AMI.

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

The proposed non-project action does not include construction or development that would eliminate any housing units at this time. Future development related to the proposal could theoretically involve demolition of existing housing units. Most religious organization-owned properties that are currently eligible for the proposed provisions have a current use other than housing. Approximately four percent of land currently owned by religious organizations has a residential use according to County property data. A religious organization could acquire property with a residential use in the future, which could indirectly lead to elimination of existing housing units if the property is redeveloped under the proposed provisions. Housing eliminated as a result of future development related to the proposal could include high-, medium-, and low-income housing, but all housing in the future development would serve exclusively low-income households for at least 50 years.

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

The proposal would result in no direct impacts to housing because no development or construction is proposed. No housing units would be constructed or demolished. The proposal could encourage development of affordable housing on sites owned by religious organizations. All housing developed under the proposal would be reserved for low-income households with incomes less than 80 percent of area median income for at least 50 years.

10. Aesthetics

a. What is the tallest height of any proposed structure(s), not including antennas; what is the principal exterior building material(s) proposed?

The proposal is a non-project action that does not include construction or development of any structures at this time. The proposal would increase height limits in some zones where residential uses are currently allowed. In most zones, the height limit increase would be at most three stories. In some zones with current height limits of 85 or 95 feet, the height limit increase would be five or six stories. In Seattle Mixed and Downtown zones, the largest height increase would be four stories. The tallest height of a structure that could theoretically be allowed under the proposal would be up to 480 feet in Downtown zones where the current height limit is 440 feet. At present no affordable housing development in Seattle has exceeded 400 feet in height. In general, the proposal would result in similar building types and materials as allowed under current rules. For further discussion of potential impacts to height, bulk, and scale, see Section D of this checklist.

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

The proposed non-project action does not include construction or development at this time that would alter or obstruct views. No changes are proposed to regulations for view protection. The proposal could indirectly affect views by allowing future development that is taller and/or larger than otherwise allowed under existing regulations, which could result in obstruction of views in the vicinity of such development and greater shading of nearby public rights-of-way or open spaces. Potential impacts of future development related to the proposal would be addressed through regulation and/or project-specific environmental review. For further discussion of aesthetic impacts related to the proposed non-project action, see Section D of this checklist.

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

A proposed upper-level setback could partially reduce the aesthetic impact of future development of taller structures related to the proposal. See illustrations of development scenarios in Appendix A and further discussion of aesthetic impacts in Section D, Question 5.

11. Light and Glare

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

The proposal is a non-project action that affects the uses and types of development allowed on parcels throughout Seattle. The proposal does not include construction or development that would directly result in light or glare. Over time, in certain zones the proposal could result in larger and taller development, which could yield slightly more light and glare than would otherwise occur under existing rules. See also additional discussion of impacts due to light and glare in Section D, Question 5.

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

No construction or development is proposed at this time that could produce light or glare that is a safety hazard or interferes with views. Potential impacts from future development related to this proposal would be addressed through regulation and/or project-specific environmental review. It is unlikely that light and glare from future affordable housing development related to this proposal would create a safety hazard or interfere with views.

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

No construction or development is proposed at this time that could be affected by off-site sources of light or glare. The proposal would affect the uses and types of development allowed on parcels throughout Seattle in zones that already allow residential uses. It is possible that future development related to this proposal could occur in areas near off-site sources of light or glare, but unlikely that such development would be significantly affected by light and glare.

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

The proposal is a non-project action. No development or construction is directly proposed. No measures are proposed to reduce or control light and glare impacts.

12. Recreation

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

The proposal is a non-project action that would affect the uses and types of development allowed on certain parcels throughout zones where residential uses are already allowed. It does not pertain to a specific site. Parks, open spaces, community centers, and other recreational opportunities are located throughout the affected area.

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

The proposed non-project action does not include construction or development at this time that would displace existing recreational uses. The proposal could make it more likely or feasible for a religious institution to redevelop its property, portions of which could be currently undeveloped and provide recreational uses, amenities or values to site users. Future redevelopment could result in a reduction in or loss of recreational uses, amenities, or values if such recreational uses or amenities are displaced.

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

None proposed. Some future development related to the proposal could be required to include open space amenity areas as part of the development.

13. Historic and cultural preservation

a. Are there any buildings, structures, or sites, located on or near the site that are over 45 years old listed in or eligible for listing in national, state, or local preservation registers? If so, specifically describe.

The proposal is a non-project action that would affect the uses and types of development allowed on certain parcels owned or controlled by religious organizations in zones that currently allow residential development. Some of these parcels have structures that are more than 45 years old and are listed in or eligible for listing in national, state, or local preservation registers. Known properties with City landmark structures are identified in Section D, Question 4 of this checklist. Other buildings more than 45 years old eligible for listing in national, state, or local preservation registers are located throughout Seattle including on sites that would be affected by the proposal.

b. Are there any landmarks, features, or other evidence of Indian or historic use or occupation? This may include human burials or old cemeteries. Are there any material evidence, artifacts, or areas of cultural importance on or near the site? Please list any professional studies conducted at the site to identify such resources.

The proposed non-project action would affect development on certain parcels throughout Seattle. Seattle has several landmarks and evidence of historic, archaeological, scientific, and cultural importance within its boundaries.

c. Describe the methods used to assess the potential impacts to cultural and historic resources on or near the project site. Examples include consultation with tribes and the department of archeology and historic preservation, archaeological surveys, historic maps, GIS data, etc.

The proposal is a non-project action that affects the uses and types of development allowed on certain parcels throughout Seattle. Potential impacts to cultural and historic resources from future development projects related to this proposal would be addressed through future permit review and in relation to the City's existing historic

preservation regulations and policies. Information regarding historic structures is available through the Seattle Department of Neighborhood's Historic Resources Survey Database and Context Statements.

d. Proposed measures to avoid, minimize, or compensate for loss, changes to, and disturbance to resources. Please include plans for the above and any permits that may be required.

The proposal would provide an FAR exemption for adaptive reuse of preservation of an existing landmark structure.

14. Transportation

a. Identify public streets and highways serving the site or affected geographic area and describe proposed access to the existing street system. Show on site plans, if any.

The proposed non-project action does not pertain to a specific site or discrete geographic area. The proposal would affect the uses and types of development allowed on various parcels throughout Seattle in zones where residential uses are allowed. Seattle is an urbanized area with a dense grid of residential and arterial streets that connect to major transportation routes, including Interstate 5 and State Route 99, which run north-south through the city, and Interstate 90 and State Route 520, which connect Seattle to points east across Lake Washington. Public streets and/or highways that serve or are easily accessible from sites that could be affected by future development (indirectly related to the proposal) vary in terms of their size, design, access, capacity, vehicle volumes, and relationship to their local settings.

The geographic area affected by the proposal includes some of Seattle's least densely populated areas served primarily by low-capacity residential streets and the densest and most urbanized areas of Seattle served by arterial streets and major routes. Most sites affected by the proposal are likely to have access to the existing street system; some large, undeveloped sites may require a connection to the existing street system as part of future project development. More specific information concerning site-specific public streets and highways would be addressed during future permitting of individual development projects.

b. Is the site or affected geographic area currently served by public transit? If so, generally describe. If not, what is the approximate distance to the nearest transit stop?

The proposed non-project action would affect certain parcels owned or controlled by religious organizations throughout Seattle. Seattle is served by bus, trolley, light rail, and commuter rail public transit. The affected area of this proposal includes sites well served by transit and others located farther from transit service. Site-specific information concerning local public transit options would be addressed during future permitting of individual development projects. See also Section D for further discussion of potential impacts on demand for public transit related to the proposal.

c. How many additional parking spaces would the completed project or non-project proposal have? How many would the project or proposal eliminate?

The proposed non-project action would not construct or eliminate any parking spaces. Potential impacts on parking availability and demand from future development (indirectly related to the proposal) would be addressed through regulation and/or project-specific environmental review.

Future residential development that may use the non-project proposal's amended code provisions would be long-term affordable housing. The proposal would not modify existing Land Use Code provisions that set no minimum parking requirement for affordable housing. The proposal could result in incrementally greater demand for on-street parking in the immediate vicinity of future development. See also Section D for further discussion of potential impacts on parking related to the proposed non-project action.

d. Will the proposal require any new or improvements to existing roads, streets, pedestrian, bicycle or state transportation facilities, not including driveways? If so, generally describe (indicate whether public or private).

The proposed non-project action does not require construction of new or improvements to existing roads; streets; pedestrian, bicycle, or state transportation facilities. Potential impacts to roads and other transportation infrastructure from future development projects (indirectly related to the proposal) would be addressed through regulation and/or project-specific environmental review. See also Section D for further discussion of potential impacts on transportation systems related to the proposal.

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

The proposed non-project action would affect uses and types of development allowed on parcels throughout Seattle in zones where residential uses are allowed. Seattle is served by railroads, seaports, and airports. No particular relationship of potential development to air, water, or rail transportation facilities is known. Project-specific information on proximity to and use of water, rail, and/or air transportation, where relevant, would be addressed during future permitting of individual development projects.

f. How many vehicular trips per day would be generated by the completed project or proposal? If known, indicate when peak volumes would occur and what percentage of the volume would be trucks (such as commercial and nonpassenger vehicles). What data or transportation models were used to make these estimates?

The proposal is a non-project action that does not directly propose construction or development that would generate vehicle trips. Potential impacts on vehicle trips from future development projects indirectly related to this proposal would be addressed through regulation and/or project-specific environmental review. Over time, the proposal could encourage future residential development that is larger and denser and includes more housing units than otherwise allowed under existing rules. This could incrementally increase vehicle trips.

g. Will the proposal interfere with, affect, or be affected by the movement of agricultural and forest products on roads or streets in the area? If so, generally describe.

No. The proposal is a non-project action that does not include any construction or development that would interfere with, affect, or be affected by the movement of agricultural and forest products. Potential impacts on the movement of agricultural or forest products from future development projects indirectly related to this proposal, if any, would be addressed through regulation and/or project-specific environmental review.

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

No measures to reduce or control transportation impacts are proposed.

15. Public Services

a. Would the project result in an increased need for public services (for example: fire protection, police protection, public transit, health care, schools, other)? If so, generally describe.

The proposed non-project action does not include construction or development at this time that would directly result in an increased need for public services. The affected area is entirely within the city of Seattle, and most affected properties are already served by existing public services, including fire and police protection, healthcare, and schools. Levels of existing public transit service vary across sites affected by the proposal, with some areas well served by high-frequency transit and others located further from transit service.

The proposal could indirectly increase demands on public services to the extent that future development related to this proposal has greater residential density than otherwise allowed under existing land use regulations and therefore results in an increase in call volumes for fire and police protection, greater use of public transit, and increased demand

for other public services. This increased need would be expected to occur incrementally over time given the finite availability of public funding for affordable housing on which such development typically relies, and because development would be dispersed across eligible sites owned or controlled by religious organizations throughout Seattle. For further discussion of potential impacts of the proposal on public services, see Section D, Question 6 of this checklist.

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

None proposed.

16. Utilities

a. Circle utilities currently available at the site:

electricity, natural gas, water, refuse service, telephone, sanitary sewer, septic system, other _____

b. Describe the utilities that are proposed for the project, the utility providing the service, and the general construction activities on the site or in the immediate vicinity which might be needed.

This proposal is a non-project action affecting primarily residential development capacity through regulatory changes, which could indirectly affect the future uses and types of development on certain parcels throughout Seattle. The proposal does not pertain to a specific site, and no construction or development is proposed at this time. Most properties affected by the proposal have access to and would use existing utilities provided throughout the city. Future development indirectly related to this proposal would require water and sewer services at similar but potentially slightly higher levels than development otherwise allowed under existing regulations. In certain cases, a future affordable housing development related to this proposal could conceivably require water and sewer services that challenge the capacity of existing pipe systems in the vicinity. This would depend on highly specific and localized characteristics of such development and pipe sizing and condition across parcels throughout Seattle that would be affected by the proposal. This analysis concludes that this could constitute an adverse but not significant adverse impact because development affected by the proposal would be expected to unfold over time and across a finite number of eligible sites dispersed throughout Seattle. Potential impacts on public utilities of future development projects would be addressed through City permit review, and localized improvements could be identified and required by Seattle Public Utilities on a project-by-project basis.

C. Signature

The above answers are true and complete to the best of my knowledge. I understand that the lead agency is relying on them to make its decision.

Signature: 

Name of signee: Nick Welch

Position and Agency/Organization: Senior Planner, Office of Planning and Community Development

Date Submitted: February 8, 2021

D. Supplemental sheet for non-project actions

1. How would the proposal be likely to increase discharge to water; emissions to air; production, storage, or release of toxic or hazardous substances; or production of noise?

As a non-project action, the proposal would not result in any direct impacts to water, air, toxic substances, or noise because it does not directly propose construction or development. The proposal could indirectly affect water, air, and noise by encouraging, in certain circumstances, future development that is incrementally larger and taller than allowed under existing development standards. This increment of additional development could result in minor adverse impacts commonly associated with infill development in urban areas, such as emissions from vehicle trips, heating, and electricity consumption associated with new buildings; minor increases in stormwater runoff; or minor increases in noise from activity typical of urban areas.

The proposal could result in construction activity that is incrementally longer and/or more intensive compared to development allowed under current land use rules. Any adverse impacts associated with this increase in construction duration or intensity on discharge to water, emissions, or toxic substances would be minor overall. Further, any future development on sites affected by this proposal would be subject to federal, state, and City provisions for construction practices, grading, environmental protection, and stormwater management.

Any incremental increase in overall greenhouse gas emissions resulting from a higher level of construction activity could be at least partially offset by reductions in vehicle trips for commuting as the proposal would allow more residents to live in areas close to employment opportunities, near amenities, and well served by transit.

Proposed measures to avoid or reduce such increases are:

None proposed.

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

This non-project action would result in no direct impacts to plants, animals, fish, or marine life because it does not directly propose development or construction. The proposal could indirectly affect plant and animal life by encouraging future development that is incrementally larger, taller, or more intensive. This increment of additional development could involve disturbing or covering more of the sites that are affected by the proposal.

This could be particularly true in single-family zones where the proposal includes an increase in allowed lot coverage, where much of Seattle's tree canopy is found, and where a large share of the land owned by religious organizations is located. Seattle's single-family zones tend to have greater tree canopy coverage, and properties in these areas may be more likely to have plants, trees, and vegetation that provide habitat for various animals. Minor adverse impacts to vegetation, tree canopy, and animal habitat could result from the proposed increases in lot coverage and residential density. A decrease in vegetation and animal habitat could occur on sites owned by religious organizations that elect to develop underutilized portions of their property that may be vegetated currently.

Single-family zones include properties near Seattle's shorelines where a greater intensity of development could have adverse impacts on the shoreline environment and marine life. However, protections in the Shoreline Master Program (SMC Chapter 23.60A) would continue to regulate to development in the Shoreline District. Single-family zones also include parks, open spaces, and undeveloped greenbelts that have substantial vegetation and tree canopy and provide ecological functions — but these sites would generally not be affected by the proposal because additional development potential is available only on single-family sites associated with a religious facility.

Overall and in aggregate, impacts to plants, animals, fish, and marine life are likely to be minor because additional lot coverage is available only on the limited number of sites that are owned or controlled by a religious organization and only for the development of long-term affordable housing. In other words, net differences in potential adverse impacts to vegetation or animals would likely be minor, when comparing future development under the proposed codes to development possible under existing rules.

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

Existing regulations in the Seattle Municipal Code (SMC) will help minimize impacts on plants and animals. In some cases, existing development regulations could improve outcomes for plants and animals through landscaping or tree preservation and replanting requirements. Most zones affected by the proposal include Green Factor landscaping requirements, which would likely improve ecological functions as a result of redevelopment. The City's tree protection ordinance would apply to all development affected by the proposal and requires replanting for removal and protection of exceptional trees.

While development SF 5000, SF 7200, and SF 9600 zones is not currently subject to Green Factor, the proposal includes additional setback standards requiring new structures to recede further from street lot lines and neighboring property lines than otherwise required.

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

As a non-project action, the proposal would not deplete energy or natural resources because it does not directly propose development or construction. The proposal could indirectly affect energy and natural resource consumption by allowing future development that is incrementally larger, denser, or more intensive than allowed under existing development standards. This could result in an impact on energy and natural resources due to incrementally greater energy and resource use for construction and operation of future development. This potential impact is likely to be minor because this type of incrementally larger or more intensive development is expected to occur relatively infrequently (in the context of overall citywide development volumes) given the limited number of sites eligible for the proposed provisions, and because energy and resource use for future development related to this proposal would nevertheless remain generally consistent with other types of construction, development, and operation in urban areas.

New development will continue to be subject to energy efficiency requirements in the Seattle Energy Code. To the extent that the proposal results in greater residential density on a given site or in a given area, increases in energy use for construction and/or operation of the development could be at least partially offset by allowing more people to live near a mix of uses, businesses, and transit service that they can reach by walking or biking, thereby reducing energy and resource use associated with private vehicle travel.

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

None proposed.

4. How would the proposal be likely to use or affect environmentally sensitive areas or areas designated (or eligible or under study) for governmental protection; such as parks, wilderness, wild and scenic rivers, threatened or endangered species habitat, historic or cultural sites, wetlands, floodplains, or prime farmlands?

The proposed non-project action would not result in direct impacts to protected areas, parks, wilderness, habitat, historic or cultural sites, or other environmentally sensitive areas because it does not propose construction or

development. The proposal could encourage future development that is incrementally larger or more intensive than existing land use standards allow and that results in slightly greater potential for adverse impacts to environmentally sensitive areas. Greater residential density allowed under the proposal could result in incrementally more intensive land uses and associated impacts to environmentally critical areas (ECAs) if they are present in the site vicinity, such as steep slopes, wetlands, or wildlife habitat. This would be most likely to occur from development of sites owned by religious organizations in single-family zones, where many wetlands and other ECAs are located. Overall, this constitutes a potential adverse but not significant adverse impact because the degree of increase in land use intensity under the proposal is only slightly to modestly greater than could result from development under existing conditions in areas that are currently low density. Existing regulations in Chapter 25.09 of the SMC pertaining to development in ECAs would continue to regulate any development on a property with an ECA and thus greatly limit the potential for substantial adverse environmental impacts.

The proposal could indirectly result in future adverse impacts to historic or cultural sites, or at sites with buildings and features that are presently undesignated as historic or cultural sites but could potentially receive such designation in the future. The proposal would generate this potential adverse impact by being a factor that could encourage future development on properties where religious facilities are located. The following table is an inventory of properties owned by religious organizations that include a designated landmark.

Existing regulations for historic preservation in Title 25 of the SMC would continue to apply to any redevelopment of landmarked religious facility. Given their strength, these regulations and policies make it unlikely that the proposal generally would create a new permitting obligation or risk of removal of a historic or cultural site or landmark where it otherwise could not occur. Therefore, the proposal would not negate protects for designated landmarks.

Property name	Address	Property owner
Seattle Buddhist Church	1427 S Main St	SEATTLE BUDDHIST CHURCH
Old Georgetown City Hall	6202 13th Ave S	NEIGHBORCARE HEALTH
Church of the Blessed Sacrament and Rectory	5041 9th Ave NE	PRIORY OF BLESSED SACRAMENT
St Spiridon Russian Orthodox Cathedral	400 Yale Ave N	ST SPIRIDON ORTHODOX CATHE
Immanuel Lutheran Church	1215 Thomas St	COMPASS-CASCADE
Mt Baker Presbyterian Church	3201 Hunter Blvd S	MT BAKER PK PRESBYTERIAN CH
Seattle Japanese Language School	1414 S Weller St	NIKKEI HERITAGE ASSOCIATION
Mount Zion Baptist Church	1634 Reverend Dr. S. McKinney Ave	MOUNT ZION BAPTIST CHURCH
Seventh Church of Christ (former)	2555 8th Ave W	SEATTLE CHURCH OF CHRIST
First Covenant Church	1500 Bellevue Ave E	FIRST COVENANT CHURCH
Temple de Hirsch Old Sanctuary	1500 E Union St	TEMPLE DE HIRSCH SINAI
Seattle 1st Baptist Church	1121 Harvard Ave	FIRST BAPTIST CHURCH
Beacon Hill 1st Baptist Church	1607 S Forest St	BEACON HILL FIRST BAPT CH
University Presbyterian Church "Inn"	4555 16th Ave NE	UNIVERSITY PRESBYTERIAN CH
Fauntleroy Community Church and YMCA	9260 California Ave SW	FAUNTLEROY CHURCH
St James Cathedral, Rectory / Site	9th Ave / Marion St	CCAS PROPERTY & CONST
New Age Christian Church	1763 NW 62nd St	INTERFAITH COMMUNITY CHURCH
Bethany Presbyterian Church	1818 Queen Anne Ave N	BETHANY PRESBYTERIAN CHURCH
St Nicholas/Lakeside School	1501 10th Ave E	ST MARKS CATHEDRAL
St Joseph's Church	732 18th Ave E	CCAS PROPERTY & CONST
St Nicholas Russian Orthodox Cathedral	1714 13th Ave	ST NICHOLAS RUSSIAN CHURCH
1st African Methodist Episcopal Church	1522 14th Ave	FIRST A M E CHURCH

Overall, about three percent of properties owned by a religious organization includes a landmarked structure.

Some properties owned by religious organizations include relatively older structures that, while not designated as landmarks, may potentially be designated as historic resources at a later date. Based on King County Assessor data, at least 14 percent of properties owned by a religious organization have a structure built before 1970. Some additional properties may have a pre-1970 structure, but the data on year built reflects newer structures on the property.

The proposal includes height and FAR increases in zones located in nationally and locally designated historic districts. Development in these areas would continue to be subject to historic preservation regulations in SMC Title 25 (and potentially other regulations in Title 23 and other Titles) and review by the respective preservation board. Currently, less than a dozen properties owned by religious organizations appear to be located in historic districts according to data from the King County Assessor.

Impacts could also potentially occur from taller affordable housing development in a historic district if it would be evaluated and concluded to be incompatible with the surrounding historic scale of development. This analysis concludes that this would constitute an adverse but not significant adverse impact given the relatively small number of properties eligible for the proposed provisions located in historic districts; because existing historic preservation regulations and SEPA regulations would apply to development on properties with landmark structures; and because other pertinent regulations and permitting processes could be used to induce or require applicants to provide building designs that address and mitigate potential compatibility-related impacts.

Because they are buried under soils, most cultural sites and resources at risk from future development in Seattle are in unknown locations, though the presence of such resources is known to be more likely in certain areas, such as near-shore sites, given past activities of Indigenous peoples. The proposal is not likely to result in development outcomes that would significantly increase the potential for disturbance of cultural sites or resources. It would also not affect the strength of regulatory protection of those cultural sites or resources, if discovered, which is addressed by other State and local regulations, policies, and practices.

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

The proposal would provide an FAR exemption for adaptive reuse or preservation of an existing landmark structure.

5. How would the proposal be likely to affect land and shoreline use, including whether it would allow or encourage land or shoreline uses incompatible with existing plans?

As a non-project action, the proposal would result in no direct impacts to land or shoreline use and is unlikely to result in significant indirect or cumulative impacts. The proposal would modify land use rules for specific types of property and development. The proposed changes would apply citywide and in most zones, subject to certain eligibility criteria described in Section A, Question 11.

Overall degree of land use change

For the purposes of analyzing potential adverse land use impacts, the amount of development likely to result from the proposal is partly a product of the amount and distribution of land owned by religious organizations. As illustrated in Section A, Question 12, and detailed in Appendix A, religious organizations own about 396 acres of land, based on best available property ownership data. This comprises less than one percent of all land in Seattle. As described in Appendix A, most of this land (about 61 percent of parcels and 65 percent of land area) is developed with religious facilities and about one-third is developed with other structures, which could make redevelopment less likely if these buildings are actively in use. Some religious organization-owned land (10 percent of parcels, four percent of land area) has an existing use described as vacant in King County records. Even if a substantial portion of land owned by religious organizations were redeveloped in the near term to the largest extent possible under this proposal, it would represent

a relatively small share of development in Seattle, which in recent years has added about 10,000 new housing units annually.

The proposed modifications to maximum height and FAR limits would also be available for property that eligible religious institutions may acquire in the future. It is not possible to identify specific additional sites that these organizations could own or control in the future, but it is unlikely that this would be a common phenomenon. Religious institutions tend to have limited funds available for land acquisition, and many already have more land than they need to perform their organizational functions. The high cost of land in Seattle makes it further unlikely that these organizations would frequently or to a substantial degree acquire additional property. Many faith institutions, including for example several churches in Seattle's Central Area, have in recent years sold their property and relocated outside the city. For these reasons, while other sites beyond those currently owned by religious organizations and identified in Appendix A could theoretically someday become eligible for the proposed development standards, this is likely to be an uncommon consequence with *de minimis* potential to increase the extent of adverse development-related environmental impacts.

The incremental amount of additional development we can expect to result from the proposal is also a function of limited public funds available for affordable housing. Most income-restricted affordable housing developed in Seattle includes funding from the Seattle Office of Housing, which at least once per year issues a Notice of Funding Availability (NOFA) for its Rental Housing Program. The NOFA describes specific funding priorities and requirements for its various fund sources, of which the Seattle Housing Levy is typically the largest. (A separate NOFA for affordable homeownership projects is published twice each year.) Since 2017, the Rental Program NOFA has awarded between \$78 million and \$110 million to fund construction and preservation of affordable housing. The largest investment to date came in 2019, when the City funded creation of 1,944 new affordable rental homes across 13 buildings.

Together, these factors would constrain the potential incremental amount and timing of additional future development that this proposal could yield. It is likely that religious property owners seeking to redevelop their sites with affordable housing would pursue City funding, a competitive process that is regularly oversubscribed. Further, the additional development potential provided by the proposal is available only on a limited number of sites that fulfill certain criteria.

In SF zones, the proposal would apply only on sites of at least 10,000 square feet or associated with a religious facility or use. This limits the scope of the proposal to only a fraction of properties in SF zones. About 232 acres of property currently owned by a religious organization meet one of these criteria. A religious organization could assemble multiple smaller properties to achieve the minimum site area, provided the site is also associated with a religious use. Development under the proposal would also be subject to clustering requirements that increase the separation between new and existing structures, at least partially offsetting the potential for adverse land use impacts in single-family zones. Overall, these factors mean the potential for adverse land use impacts from the proposal in single-family zones is likely to be minor since only a limited number of sites could be affected and they are generally well dispersed throughout single-family zones and not concentrated in a particular area.

As described below, this analysis finds that adverse impacts could occur to land use and development patterns and height, bulk, and scale due to the allowance of small-scale commercial uses in multifamily residential zones, additional forms of housing in single-family zones, and a larger scale of development in multifamily and mixed-use zones. These represent probable adverse but not significant adverse impacts because a relatively limited number of sites are eligible for the proposed provisions and the pace of potential future development related to the proposal is likely to unfold gradually. Below is an examination of anticipated land use impacts in more specific and localized contexts.

Use and development patterns

Under the proposal, increases in maximum height and FAR limits could result in greater housing density and taller, larger structures on properties. Denser development and increased activity could result in slightly greater land use

impacts compared to future development under existing land use standards. These net increases in potential impacts would generally be consistent with the characteristics of their urban contexts: the degree of increased development potential would generally be greater in already-denser environments, such as urban centers and urban villages with more intensive zoning, and lesser in areas with less intensive zoning and existing development patterns. Overall, the potential incremental increase in density and activity that could result from future development indirectly related to the proposal would remain consistent with the characteristics of urban environments. In mixed-use zones that already allow various uses, including multifamily housing, retail, office, and other commercial uses, the existing mix of allowed uses and overall development pattern would not change.

In multifamily residential zones, the proposal would allow small ground-floor commercial spaces subject to existing standards in Residential–Commercial zones (SMC Chapter 23.46). This could result in small-scale commercial uses in zones that otherwise do not allow them, introducing a greater variety of uses in the general vicinity of the project. These uses could result in impacts in the form of added noise, increased pedestrian and vehicle trips, and other characteristics of commercial activity. This impact would represent an adverse but not a significant adverse impact because standards for size, location, and visibility of the commercial space would tend to limit the amount of activity it generates, and because sites eligible for the provisions of this proposal would tend to be dispersed throughout the city. While the introduction of small-scale commercial uses could yield incrementally greater vehicle traffic in the immediate vicinity of the project, some of this impact would be at least partially offset by a reduction in vehicle trips that local residents otherwise would be likely to take to reach services and amenities the new small-scale commercial space could fulfill.

Impacts in SM and Downtown zones would be similar but more likely to be minor since only three percent of property owned by religious organizations is located in these zones, which are the most highly developed, high-intensity, and urbanized parts of Seattle. The proposal would not modify allowed uses or alter the existing development patterns in SM and Downtown zones. Most of these zones already allow a range of uses that the proposal would maintain. Eligible sites in these zones owned by religious organizations generally already have capacity for redevelopment under existing zoning. Therefore, the proposal would not be likely to affect whether a site eventually is redeveloped but could result in incrementally larger development and greater residential density if it redevelops and could encourage affordable housing as a use. Downtown and most areas with SM zoning already have many affordable housing developments, so the proposal would likely contribute to maintaining a consistent, compatible, mixed-use use pattern in these zones.

In single-family zones, the proposal would continue to allow only residential development, though the type and form of housing could vary from current development patterns. In RSL zones, various housing forms are already allowed, including detached homes, attached townhouses and rowhouses, and stacked flats. The proposal would maintain this variety and allow a greater number of homes to be developed on a given site by increasing FAR, density, and coverage limits. Denser affordable housing development could result in incrementally more intensive land use but would not depart from existing predominantly residential use patterns. A wider range of housing types would be allowed, including detached and attached forms of ownership and rental homes. Housing units could be configured in various forms, including clustered housing, side-by-side townhouse or rowhouse units, or stacked units. While the scale of overall development allowed on a site would not change substantially from existing standards, the resulting development pattern and form could depart from the regular pattern found in many SF zones with a single detached house on each lot. This analysis concludes that these cumulative effects on future development related to the proposal would represent an adverse but not significant adverse impact due to the relatively modest degree of increase in probably development intensity in these zones, and also because such development would occur gradually and only on a limited number of eligible sites that are dispersed throughout Seattle.

Height, bulk, and scale

Multifamily and mixed-use zones

The proposal could result in changes to the height, bulk, and scale of some future development on certain sites throughout Seattle. On eligible properties, new buildings could be somewhat larger and taller than other recent or existing development in the vicinity, i.e., increases in probable height and bulk in future development could occur to varying degrees depending on the proposed level of change by zone category. The proposal increases height and floor area limits but does not modify setback requirements, so new buildings eligible for these provisions could be taller but would occupy a similar footprint as otherwise allowed. The additional height of new buildings could result in greater shading of nearby public rights-of-way or open spaces.

While the proposal generally applies citywide in all multifamily and mixed-use zones, only a limited number of properties are eligible. Consequently, eligible properties which redevelop to the proposed standards could achieve a scale of development that exceeds existing or potential new development on adjacent and nearby sites. This could create a more varied development pattern in terms of form and scale. Multifamily and mixed-use zones typically abut other zones, with varying degrees of transition between zones of different scales. In certain instances, the proposal could result in steeper or sharper transitions in scale to adjacent smaller-scale zones. For example:

- A Lowrise 1 (LR1) zone and adjacent single-family zone currently have the same height limit, but under the proposal, future redevelopment on the Lowrise property could be one or two stories taller than the adjacent single-family development.
- A block partially zoned for mixed-use with 40-foot height limit (such as an NC2-40 zone) and partially zoned LR1 could have a height difference of one story under current standards, but up to four stories under the proposal given the difference between the proposed 75-foot height limit for the NC2 zone and 30-foot existing height limit for the LR1 zone.

In Commercial and Neighborhood Commercial zones with current height limits of 85 or 95 feet, the proposal would allow up to six additional stories compared to existing standards. This could result in a larger scale and different form of development, and sharper scale changes comparing between future and existing development or with adjacent lower-scale zones. This could create an adverse but not significant adverse impact because the resulting development would have a similar overall form as otherwise currently allowed or, if using the maximum allowed height, would be required to have a narrower form that partially mitigates the impacts of an increase in bulk and visual prominence of a taller structure; and because the proposal includes a new upper-level setback requirement for portions of the structure that exceed the existing height limit. Note also that only four religious-organization owned properties in the city that would be eligible for the proposed provisions are in zones with height limits of 85 or 95 feet. Further, development of affordable housing to heights of 125 feet or higher has historically been rare and would be highly unlikely to occur in the future given affordable housing development financing norms.

Impacts in SM and Downtown zones would be similar to those described above for other mixed-use zones. The proposal would increase height and FAR limits in SM and Downtown zones above current standards. Specific increases would vary by zone and the scale of development allowed but could include up to four stories of height and an increase of 3.0 FAR. On the limited number of religious organization-owned sites eligible for these provisions, these changes might generate adverse height-, bulk-, and scale-related impacts. Incrementally greater shading of nearby public rights-of-way or open spaces could occur. The magnitude of visual changes due to the proposal's allowances for increased building height, bulk, and scale could increase the variety of building height and scale in the urban center environments where these zones are located, and where existing land use is relatively intensive. Overall, given this existing intensity of use and character in affected SM and Downtown zones, and given the relatively few sites eligible for height and FAR increases in these zones, the proposed difference in height of two to four additional stories can be accommodated without generating significant adverse height, bulk, and scale impacts.

Appendix A includes several urban design scenarios that illustrate potential scale changes between existing development and potential new buildings developed to the proposed standards. This analysis finds that adverse height, bulk, and scale impacts could occur from the proposal's cumulative effects in influencing future development outcomes, but these are not likely to be significant adverse impacts because larger-scale development would occur gradually over time and tend to be dispersed across a limited number of eligible sites. In mixed-use zones, a proposed upper-level setback that applies to all portions of a new building that exceed the zone's height limit would partially mitigate the potential magnitude of visual and shading impacts of new buildings taller than surrounding development by requiring upper stories to recede from public view at street level. Some new development under the proposal would require issuance of a Master Use Permit (MUP) and be subject to project-level SEPA analysis and the City's Design Review program. This could also help to reduce and minimize these potential visual and shading impacts resulting from greater height and bulk in future buildings.

On eligible religious organization-owned lots that are located in multiple zones, the proposal would allow the development standards of the most intensive zone to be applied to any portion of the lot that comprises 30 percent or less of the total lot area, provided that no portion of the lot is located in a single-family zone. This could result in structures that are taller, have more floor area, and contain more housing units than allowed under existing zoning or under the provisions described above for sites located entirely in a single zone. In the immediate vicinity of these sites, this could result in an adverse impact in the form of height, bulk, and scale impacts, additional shading of neighboring properties, or a more varied development pattern in terms of form and scale. The setback requirements of the zone would continue to apply for any lot line that abuts a residentially zoned lot, which would at least partially offset the impact of larger-scale development. Based on an analysis of parcels owned by religious organizations, it appears that this flexibility would apply on only approximately 10 split-zoned sites across the city. This estimate does not consider the 30 percent lot area limit, which would further reduce the number of sites that could use this provision. Because this specific split-zone provision would apply to very few sites, and more generally because development using the proposed land use tool is likely to require limited and finite publicly resources for affordable housing, the provision is likely to have a *de minimis* overall impact on land use and aesthetics. Therefore, this analysis concludes that this provision could result in a potential adverse but not a significant adverse impact.

Single-family zones

Under the proposal, development on property owned by religious organizations in single-family zones could be somewhat larger and bulkier than zoning standards would otherwise allow. This could result in greater visual bulk of development. No change is proposed to existing height limits; in some cases, a lower height limit would apply to development that uses additional lot coverage, which would at least partially mitigate the scale of future new structures.

In RSL zones, the proposal would allow development that covers up to 15 percent more of the site. The proposed increase in the FAR limit would allow a greater amount of floor area to be constructed, which could result in minor impacts of added bulk in future new development. Housing development under the proposal could appear slightly bulkier than surrounding development, which would be expected to include a mix of detached houses and attached housing built to a similar height, smaller scale, and lower density. In SF zones, the proposal would allow development to occupy up to 15 percent more of the site provided it does not exceed two stories. This could result in minor aesthetic impacts from structures that appear visually wider and bulkier, but at a lower height than otherwise allowed. The proposal would also allow a greater number of homes subject to the same lot coverage as otherwise allowed and within a zoning envelope similar to existing development. Clustering standards would require new structures to be further from adjacent properties than otherwise required by yard standards, which would partially offset the visual effect of bulkier structures.

For certain large sites in SF and RSL zones, the proposal could result in larger-scale development than otherwise allowed, if the development is located near other higher-intensity or larger-scale zones and development. This could include taller structures that exceed the existing height limit, up to an upper limit of at most four stories in SF zones or

five stories in RSL zones. This additional development potential could be available provided that the adjacent zoning and/or nearby existing structures meet or exceed four or five stories of height, respectively. This provision could result in an adverse impact but would not constitute a significant impact because these criteria would restrict its use to situations where resulting larger-scale development would be more compatible with surrounding context than would result from the development standards that otherwise apply.

Overall, while the proposal would allow a wider range of housing types and greater residential densities compared to existing zoning, development under the proposal would generally occur on relatively large sites already occupied with a religious facility. In most cases, this existing use is already a departure from the pattern of a single detached house on a lot of roughly 4,000-6,000 square feet in size. The proposal would not be expected frequently to result in the conversion of detached single-family houses into a different, more intensive residential use but rather the reuse of underdeveloped property (like a surface parking lot) or redevelopment of site that already differs from the established development pattern. Therefore, this analysis finds the proposal could result in an adverse impact to height, bulk, and scale in single-family zones, but this would not represent a significant adverse impact since such development would occur relatively infrequently and in a dispersed pattern on a limited number of eligible sites, and because existing structures on eligible sites often already depart from the existing aesthetic built environment context.

Light and glare

The increased size of new buildings allowed on certain sites under the proposal could incrementally increase illumination in the immediate vicinity of the development. On sites that abut arterials and other heavily used roadways, which comprise a substantial share of mixed-use zoning, the degree of additional light or glare would be minor in the context of other structures and sources of illumination in the area. In multifamily zones where the proposal could result in a change in housing type, such as from townhouse development to apartment development that is one story larger than otherwise allowed, the increase in scale and in the number of homes contained in the structure could yield a more noticeable increase in illumination. The overall impact to light and glare is likely to be minor since the number of sites eligible for the provisions in this proposal is relatively limited. The proposal would also allow denser residential development in single-family zones. This could result in more illumination. Impacts related to increases in light from future development might be greater in SF zones, given their lower existing densities and probable lower-lit existing conditions) than in RSL zones, which are located in urban villages and tend to be near more existing sources of light. Overall, this type of impact would represent an adverse but not significant adverse impact because increases in illumination would be incremental and occur only a limited number of eligible sites.

Housing

The proposal would result in no direct impacts to housing since no construction is proposed. The proposal would implement land use rules that encourage creation of long-term, income-restricted affordable housing. All housing created under this proposal would be reserved for at least 50 years for households with incomes at or below 80 percent of area median income. This type of development would be expected to partially ameliorate Seattle's acute housing need and is not likely to worsen existing housing affordability challenges. Adverse impacts could occur if the proposal increases the demolition of existing housing, but this is unlikely given the type of sites eligible for the proposed development standards, which are properties owned or controlled by religious organizations and very few of which are currently in use for housing. Even if existing housing were demolished due to this proposal, the resulting redevelopment would necessarily include regulated affordable housing at likely a much larger scale and amount than the number of homes demolished.

Housing impacts in single-family zones are not likely because more than 60 percent of properties owned by religious organizations in these areas have religious facilities and are unlikely to include existing housing. Even if existing housing were demolished due to this proposal, the resulting redevelopment would necessarily include regulated affordable housing at likely a much larger scale and amount than the number of homes demolished. While new

development in single-family zones, particularly SF zones, tends to be ownership housing, the proposal could increase the likelihood that new development includes affordable rental homes.

Consistency with Comprehensive Plan policy

The proposal aims to support housing affordability — an objective identified in and supported by several Comprehensive Plan goals and policies — while maintaining land use compatibility with existing development. The Comprehensive Plan provides the following guidance related to housing affordability:

H 1.7 Support the development and preservation of affordable housing in areas with a high risk of displacement through tools and actions such as land banking, public or non-profit acquisition of affordable buildings, and new affordable and mixed-income development.

The proposal includes land use changes that would facilitate religious institutions and nonprofit housing organizations creating affordable housing throughout Seattle, including in neighborhoods facing a high risk of displacement.

H 2.4 Encourage use of vacant or underdeveloped land for housing and mixed-use development, and promote turning vacant housing back into safe places to live.

Many sites owned by religious organizations are relatively underdeveloped. The proposal would advance this Comprehensive Plan policy by providing additional development potential for development that includes 100 percent affordable housing.

H 3.3 Encourage the development of family-sized housing affordable for households with a broad range of incomes in areas with access to amenities and services.

The proposal would provide additional development potential and flexibility for affordable housing reserved for low-income households in urban villages and other multifamily and mixed-use zones with good access to amenities and services. In these zones, additional floor area would be possible for certain uses and housing types, including specifically family-size homes.

H 3.5 Allow additional housing types in areas that are currently zoned for single-family development inside urban villages; respect general height and bulk development limits currently allowed while giving households access to transit hubs and the diversity of goods and services that those areas provide.

In single-family zones inside urban villages, the proposal would allow incrementally more housing development and flexibility for additional housing types compared to current zoning, all at a similar height, bulk, and scale that is otherwise allowed.

H G5 Make it possible for households of all income levels to live affordably in Seattle, and reduce over time the unmet housing needs of lower-income households in Seattle.

H 5.2 Expand programs that preserve or produce affordable housing, preferably long term, for lower-income households, and continue to prioritize efforts that address the needs of Seattle's extremely low-income households.

The proposal supports Comprehensive Plan goals and policies for addressing housing affordability by creating a new tool religious organization can use to create affordable housing. All housing created through the proposed provisions would be reserved for households with incomes less than 80 percent of area median income for at least 50 years. In practice, many of these development projects would use public funds through the Seattle Office of Housing or another source. Public funding often provides deeper levels of affordability, including for extremely low-income households earning less than 30 percent of AMI.

H 5.3 Promote housing affordable to lower-income households in locations that help increase access to education, employment, and social opportunities, while supporting a more inclusive city and reducing displacement from Seattle neighborhoods or from the city as a whole.

By including land use code provisions that generally apply in all zones where residential development is allowed, the proposal would encourage affordable housing on sites owned by religious organizations in areas with high access to opportunity as well as areas with high risk of displacement.

H 5.6 Increase housing choice and opportunity for extremely low- and very low-income households in part by funding rent/income-restricted housing throughout Seattle, especially in areas where there is a high risk of displacement. Also increase housing choice in areas where lower-cost housing is less available but where there is high-frequency transit service and other amenities, even if greater subsidies may be needed.

H 5.7 Consider that access to frequent transit may lower the combined housing and transportation costs for households when locating housing for lower-income households.

Through this proposal, religious organizations throughout Seattle may be better suited to pursue public funds to finance development of long-term income-restricted affordable housing. Housing developed with public funding often serves households with very low and extremely low incomes. The proposal specifically encourages affordable housing development in areas where high-frequency transit service is available by providing additional floor area on sites within walking distance of frequent transit.

Growth Strategy and Land Use

A substantial share (about 70 percent) of land owned by religious organizations, which would be eligible for the additional development potential in the proposal, is located outside urban villages. The Comprehensive Plan Growth Strategy (GS) and Land Use (LU) elements provide the following policy guidance for areas outside urban villages:

GS 1.22 Support healthy neighborhoods throughout the city so that all residents have access to a range of housing choices, as well as access to parks, open space, and services

LU G1 Achieve a development pattern consistent with the urban village strategy, concentrating most new housing and employment in urban centers and villages, while also allowing some infill development compatible with the established context in areas outside centers and villages.

The proposal would support this guidance by encouraging affordable housing development on a limited number of sites in religious ownership distributed throughout the city.

LU 2.4 Limit nonresidential uses in residential zones to those necessary or highly compatible with the function of residential neighborhoods.

For affordable housing developments on eligible properties owned or controlled by religious organizations, the proposed provisions would allow small nonresidential uses, such as office, arts and cultural space, or neighborhood-serving retail, in multifamily zones, subject to existing standards for noise, signage, and size limits in Chapter 23.46 for Lowrise and Midrise Residential–Commercial zones. These standards would encourage compatibility with the function of residential neighborhoods. Nonresidential uses would not be allowed as part of such developments in single-family residential zones.

Special Uses: Public Facilities and Small Institutions

Comprehensive Plan guidance also address institutions and historic preservation, which both pertain to properties owned by religious organizations:

LU 3.2 Allow public facilities and small institutions to depart from development standards, if necessary, to meet their particular functional requirements, while maintaining general design compatibility with the surrounding area’s scale and character. Require public facilities and small institutions to adhere to zoned height limits, except for spires on religious institutions. Consider providing greater flexibility for schools in recognition of their important role in the community.

The proposal would modify development standards for property owned by religious institutions, but the changes would apply primarily to affordable housing use and fulfill requirements in SHB 1377. Standards for functional requirements of religious organizations would largely remain the same. The proposal would add some flexibility for small-scale uses that support the mission of religious organizations, such as office use in multifamily residential zones, subject to certain size limits and design requirements. Institutional uses would continue to be subject to existing zoned height limits.

LU 3.3 Allow standards to be modified for required off-street parking associated with public facilities and small institutions based on the expected use and characteristics of the facility and the likely impacts on surrounding parking and development conditions, and on existing and planned transportation facilities in the area.

The proposal maintains off-street parking requirements for institutions. Development of affordable housing is generally not subject to minimum requirements for off-street parking. The proposal would not modify this existing provision.

LU 3.4 Avoid clusters of public facilities and small institutions in residential areas if such concentrations would create or further aggravate parking shortages, traffic congestion, and noise in the area.

The proposal would not modify where religious institutions are allowed in residential areas.

Single-Family Residential Areas

The Comprehensive Plan includes policies specifically for single-family residential areas. The proposal would encourage affordable housing by adding flexibility for housing types and allowing additional homes to be constructed, while maintaining standards for height, bulk, scale, and compatibility. The following policies guide development policy for single-family areas.

LU 7.2 Use a range of single-family zones to

- maintain the current low-height and low-bulk character of designated single-family areas;
- limit development in single-family areas or that have environmental or infrastructure constraints;
- allow different densities that reflect historical development patterns; and
- respond to neighborhood plans calling for redevelopment or infill development that maintains the single-family character of the area but also allows for a greater range of housing types.

The proposal would maintain existing low height limits in single-family areas. No change is proposed to maximum height limits for single-family zones. Changes to density standards would allow more affordable homes to be constructed on a given site at scale and bulk similar to existing rules. Regulations for environmentally critical areas (ECAs) and tree protection would continue to apply in single-family areas with environmental constraints. The proposal would generally maintain the overall scale and urban form of development in single-family areas while allowing for a greater range of housing types.

LU 7.3 Consider allowing redevelopment or infill development of single-family areas inside urban centers and villages, where new development would maintain the low height and bulk that characterize the single-family area, while allowing a wider range of housing types such as detached accessory units, cottage developments or small duplexes or triplexes.

Single-family areas inside urban villages primarily have Residential Small Lot (RSL) zoning. No change is proposed to the low height limit in RSL zones. On a limited number of eligible sites, the proposal would allow a wider range of housing types, including cottage developments, small duplexes and triplexes, and townhouses, at a scale and bulk similar to existing rules.

LU 7.8 Use minimum lot size requirements to maintain the character of single-family residential areas and to reflect the differences in environmental and development conditions and densities found in various single-family areas throughout the city.

The proposal would not modify existing minimum lot size requirements in SF zones. The proposal includes a minimum site area requirement that limits its provisions only to relatively larger sites and excludes the vast majority of properties in single-family zones.

In RSL zones, the proposal would maintain a lower minimum lot size requirement to allow more affordable homes to be created on a given site. This change could incrementally increase the density and intensity of residential use on certain properties in RSL zones.

LU 7.9 Allow exceptions to minimum lot size requirements to recognize building sites created under earlier regulations and historical platting patterns, to allow the consolidation of very small lots into larger lots, to adjust lot lines to permit more orderly development patterns, and to provide more housing opportunities by creating additional buildable sites that integrate well with surrounding lots and do not result in the demolition of existing housing.

The proposal would not alter existing exceptions to minimum lot size requirements. The proposed changes to density limits in SF and RSL zones would increase housing opportunities on existing buildable sites. In SF zones, clustering requirements would help to integrate new affordable housing development with surrounding lots.

LU 7.10 Reflect the character of existing low-density development through the regulation of scale, siting, structure orientation, and setbacks.

The proposal includes siting and clustering requirements that require new structures to be set back further from the property line than would otherwise be required under existing standards. This helps preserve the existing pattern of setbacks, buffer the transitions in scale between development and neighboring structures, and regulate the siting of new structures.

LU 7.12 Emphasize measures that can increase housing choices for low-income individuals and families when considering changes to development standards in single-family areas.

The proposal would establish policies that encourage low-income housing specifically. All housing created under the proposed provisions would be reserved for at least 50 years for households with incomes at or below 80 percent of area median income. The proposal would increase the likelihood that affordable housing developed with public funding is feasible on property owned by religious organizations in single-family zones.

Historic Preservation and Cultural Resources

The proposal would affect the types and amount of development allowed on sites owned by religious institutions, some of which include historic resources. Relevant Comprehensive Plan policies related to historic preservation include the following:

LU 14.1 Maintain a comprehensive survey and inventory of Seattle's historic and cultural resources. Update the survey and inventory when developing a new community plan or updating an existing plan, as appropriate.

Twenty-two properties owned by religious organizations appear in the City's inventory of landmark sites. The proposal would not modify existing rules and processes for development on property with landmarked structures.

LU 14.3 Tailor development standards and design review processes specifically for a special review district to describe design-related features allowed, encouraged, limited, or excluded from the district. Allow adopted guidelines to modify, exempt, or supersede the underlying zone's standards.

Standards, guidelines, and review processes for development on properties with landmark structures or in landmark districts would not change under the proposal.

LU 14.4 Encourage the adaptive reuse of designated landmark structures by allowing uses in these structures that may not otherwise be allowed under the applicable zoning, provided such action is approved by the Landmarks Preservation Board.

The proposal would encourage adaptive reuse of landmark religious facilities by facilitating affordable housing development on these sites and providing an FAR exemption for a certain amount of floor area for preservation or adaptive reuse of a landmark structure.

LU 14.5 Use incentives, including the transfer of development rights, to encourage property owners and developers to restore or reuse designated landmark structures and specified structures in designated districts.

An FAR incentive would allow additional development for certain types of uses and floor area, one of which would include adaptive reuse of a landmark or historic structure. This would incentivize preserving, restoring, and reusing existing designated landmark structures.

LU 14.7 Protect the scale and character of the established development pattern, while encouraging compatible and context-sensitive infill development.

The proposal encourages contextual affordable housing development by varying zone by zone the amount of additional development potential available for properties owned by religious organizations. In lower-scale zones, increases in FAR and density would allow additional affordable housing production while maintaining the existing height limit. In Lowrise Multifamily zones, affordable housing on eligible properties could be one or two stories taller than otherwise allowed. In larger-scale mixed-use zones found in Seattle's most urbanized areas, larger increases in scale are proposed.

LU 14.9 Identify historic resources that can be successfully used to meet the city's housing goals.

The proposal would facilitate reuse or redevelopment of religious facilities, some of which represent historic resources, for affordable housing that would partially help meet the city's housing goals.

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

The proposal includes an upper-level setback in certain zones that would partially reduce the potential for visual impacts from the greater height and bulk of potential future development of taller buildings.

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

The proposed non-project action would result in no direct impacts to or increases in demand for transportation, public services, or public utilities. Over time, the proposal could result in larger and denser residential development that includes more housing units than otherwise allowed under existing regulations that would incrementally increase the potential cumulative impacts of increased demands on transportation, public services, and utilities in any given area and across the city as a whole.

In 2017, the City published an EIS for citywide implementation of Mandatory Housing Affordability (MHA), which contemplated upzones in all mixed-use and multifamily zones and about six percent of single-family zones. The MHA EIS evaluated potential impacts on transportation and public services and utilities from an additional increment of housing growth that could result from the MHA rezone beyond the amount studied in the Seattle 2035 Comprehensive Plan EIS. The MHA EIS evaluated several action alternatives that included citywide growth of approximately 95,000 housing units over a 20-year planning horizon. The City in 2018 also evaluated impacts on transportation, parking, and public services and utilities in single-family zones in a Final EIS for policy changes related to accessory dwelling units (ADUs).

Overall, potential impacts on transportation and public services and utilities from the proposed non-project action would tend to be localized and are unlikely to be significant because the proposed additional density is available only in limited circumstances (for long-term affordable housing and on a limited number of properties owned or controlled by religious organizations) and because the additional increment of residential development that could result from the proposal is minor in the context of overall housing growth forecasted in Seattle.

Transportation

The proposal would allow additional development of long-term affordable housing on property owned by religious organizations. On eligible sites, the proposal could result in larger affordable housing developments in zones that already allow multifamily residential use, and small-scale multifamily development in single-family zones. Typical multifamily dwelling units generate approximately six peak-hour automobile trips per 10 dwelling units based on City permitting experience. In a fully affordable housing development, a lower level of vehicle ownership may be probable compared to a typical multifamily development, though this could vary from site to site. The potential increase in residential density resulting from future development under the proposal would vary depending on zone, site size, and development type. In most multifamily and mixed-use zones, the proposal would allow up to three additional stories of development and, depending on the zone, at most twice as many residential units.⁴ Using a typical site size of 15,000 square feet in an NC-40 zone, this could result in up to 50 additional housing units that would translate to about 30 additional peak-hour automobile trips. At this rate, the difference in traffic and impacts to the street system attributable to the proposal could result in localized impacts to the transportation system. This could represent an adverse but not a significant adverse impact because development related to the proposal is likely to occur gradually and be dispersed throughout the city across a finite number of sites eligible for proposed provisions.

The affected area also includes sites located in single-family zones outside urban villages that are owned or controlled by religious organizations. While proposal could introduce new, denser housing types, such as townhouse and apartment development, in single-family areas, the increment of additional density is likely to be lower in terms of additional peak-hour vehicle trips compared to the scenario described above. On a 15,000-square-foot site in an SF 5000 zone, the proposal could result in up to 10 housing units, compared to three housing units under existing regulations. Using the same trip rate, this could result in a net different of approximately four additional peak-hour vehicle trips from the net increase of seven housing units. At this rate, the net difference in automobile traffic and impacts to the street system attributable to the proposed code changes would be negligible. The proposal also allows large sites in single-family zones to accommodate larger affordable housing developments with more housing units. This flexibility would be available only on sites located in or near urban villages and close to frequent transit service, which would at least partially mitigate an increase in vehicle trips by allowing some residents to meet their daily needs via transit.

Overall, this analysis identifies no probable significant adverse transportation impacts.

Public transit

Some parcels eligible for the proposed provisions are located in urban villages and other areas with frequent transit service. In these cases, the additional increment of affordable housing that the proposal would allow on certain eligible sites could increase demand on public transit, but it is not likely to be a significant adverse impact given the typical level of transit service currently available and planned for in areas with multifamily development, and given the limited number of affordable housing developments occurring in any given part of Seattle over time. Any increase in transit demand and ridership resulting from the proposal would be within the range of transit service planning alternatives already contemplated by Seattle Department of Transportation (SDOT) and transit agencies for higher-ridership multifamily areas. Additional residential development in these areas would fall within the overall population and housing growth forecasts that guide SDOT planning and investment decisions.

Other portions of the affected area include certain eligible sites in single-family zones with lower levels of transit service. In these cases, the proposal could increase demand for transit in areas where current transit service is limited.

⁴ For example, an NC-40 zone has a floor area limit of 3.0 FAR under current regulations, of which approximately 2.0 FAR would likely be residential use. Under the proposal, the floor area limit could increase up to 5.0 FAR, of which 4.0 FAR would likely be residential use, an increase of approximately 100 percent.

This could result in localized impacts in the form of potential incremental increases in peak-hour crowding of buses and/or additional vehicle trips originating and ending in the immediate vicinity of the development.

Pedestrian infrastructure

The proposal would affect areas that vary in terms of the presence and quality of safe infrastructure for people walking, like sidewalks. In areas where sidewalks are present, the potential incremental increase in residential density would not meaningfully increase demand on pedestrian space or result in adverse impacts to pedestrian transportation. In areas where sidewalks are generally not present, which includes single-family zones toward the northern and southern ends of the city, the proposed increase in residential density could result in more people walking to and from the development without sufficient pedestrian infrastructure (e.g., shoulders and road edges).

SMC Section 23.53.006 requires certain development to construct sidewalks, curbs, and curb ramps if they are not present. In urban villages, sidewalks are generally required for any development that abuts an existing street, regardless of zone. Outside urban villages, sidewalks are required for development that abuts certain street types or includes a certain number of units. In single-family zones, development of 10 or more dwelling units triggers the requirement to construct sidewalks. The proposal would increase the likelihood that redevelopment of an eligible property owned by a religious organization would reach that threshold and therefore result in sidewalk construction. This would partially offset the impact to demands on pedestrian infrastructure.

Parking

The proposal would not modify existing requirements for off-street parking. Currently, no minimum parking requirement applies for multifamily residential uses that meet certain affordability criteria. Affordable housing developed under this proposal would typically fulfill those requirements and thus would generally not be subject to a minimum parking requirement. Future development related to this proposal could vary in terms of the number of parking spaces included per housing unit and could include residential development without off-street parking.

Because it could encourage affordable housing, which generally has no minimum off-street parking requirement, and would allow additional housing development compared to existing regulations, localized adverse impacts could occur due to increases in demand for on-street parking that spills over to surrounding streets. Overall, these impacts are likely to be localized because the proposed provisions are available only on certain properties. Impacts would likely be most pronounced in urban villages, where baseline demand for on-street parking is often high, though frequent transit service available in urban villages could somewhat reduce the vehicle ownership rate of future residents of these developments; and in certain single-family-zoned areas where lower levels of transit service provides less of an alternative to vehicle ownership, though in these areas on-street parking tends to be more widely available. Note also that City parking policies and regulations since 2018 allow for residents to seek monthly off-street and off-site parking options in existing buildings. This factor helps reduce the potential for excessive increases in competition for on-street parking because a resident with a vehicle but without an assigned on-site parking space may find opportunities to park elsewhere by pursuing available options in the vicinity.

On large sites in single-family zones, the proposal would allow larger affordable housing developments with more housing units. This flexibility would be available only on sites located in or near urban villages and close to frequent transit service, which would at least partially mitigate an increase in parking demand by reducing vehicle ownership since some residents would be able to meet their daily needs via transit.

It is anticipated that many affordable housing development projects related to the proposal would use public funding from the Seattle Office of Housing. The Office of Housing prioritizes affordable housing investments in areas with planned or existing transit access. In 2019, City investments for all affordable housing were for development sites in frequent transit walksheds (see [Seattle Office of Housing Annual Investments Report – 2019](#), March 2019, Map E, p.21). Therefore, residents of future affordable housing development related to this proposal may be more likely to choose transit over private vehicle ownership. Because the Office of Housing would continue to apply policies

regarding the location of this kind of housing with or without adoption of this proposal, no particular difference in the geographic pattern of City-funded affordable housing development is likely to occur.

City funding policy notwithstanding, the proposal could make affordable housing development more feasible in single-family zones, where localized adverse parking impacts could occur, particularly in areas where existing usage of on-street parking is high.

Overall, these localized impacts on parking would represent a probable adverse but not a significant adverse impact because the additional increment of residential density and associated increase in parking demand that could result from the proposal are relatively minor in the context of overall housing development and growth in Seattle, and because future development related to this proposal is likely to unfold gradually over time and be dispersed across eligible sites owned or controlled by a religious organization. Therefore, this analysis identifies no probable significant adverse impacts to parking.

Public services and utilities

By allowing greater density of housing on certain eligible sites throughout the city, the proposal could incrementally increase overall demands on public services and utilities. This increase is likely to be minor in the context of overall population growth and within the range of planning alternatives and growth modeling that service providers and public utilities use to anticipate changing demands. As previously discussed, the additional increment of affordable housing development allowed under the proposed policy is likely to unfold gradually over time and be dispersed throughout the city, allowing service and utility providers to adjust planning and investment decisions as needed to accommodate additional demand.

Police

The proposal is not likely to adversely impact the ability of the Seattle Police Department (SPD) to provide police services throughout Seattle or to future specific development projects related to this proposal. In a growing and changing city, demand for police services varies over time and by neighborhood. Population growth does not directly correlate to an increased demand for police services. In the context of overall ongoing and forecasted population growth in Seattle, the additional increment of housing development that the proposal would allow is relatively minor and would not be likely to have an adverse effect on police response times.

Future larger housing developments in lower-density areas could lead to an incremental increase in call volume but would not be expected to have a significant adverse effect on SPD response capabilities. Future larger housing developments in higher-density zones could result in higher call volumes but would remain within the range of scenarios that SPD can anticipate and accommodate. Future development of small-scale commercial uses in multifamily residential zones could affect the type of service SPD must provide. Since development related to the proposal is likely to occur relatively infrequently and be dispersed across eligible sites, this analysis concludes that there could be a potential adverse but not a significant adverse impact on police service.

Fire and emergency medical services

No change is proposed to existing fire and life safety requirements that apply to development. The proposal would allow additional residential density that could result in an increase in call volumes for fire and emergency medical services. Future affordable housing development related to this proposal is anticipated to unfold gradually over time and be dispersed throughout the city across eligible sites owned or controlled by religious organizations. In most cases, this potential increase in call volumes would be within the range of future planning scenarios that guide Seattle Fire Department (SFD) planning and investment decisions.

In single-family zones, a localized increase in call concentration could occur from future affordable housing development that includes a greater number of homes than otherwise allowed under existing regulations. Water

supply and hydrant availability in most single-family areas are sufficient to accommodate the additional residential density that would be allowed under the proposal (e.g., up to 10 units on a 15,000-square-foot site, compared to up to three units under current regulations).

The size and type of equipment housed in fire stations throughout the city is sufficient to protect larger and denser developments that could be constructed under the proposal because they would tend to occur in limited numbers and be dispersed throughout a given area. Population increase resulting from larger developments would be unlikely to adversely affect SFD's ability to provide emergency medical services because the increase would be relatively small in the context of total population that SFD serves in a given area.

Seattle City Light

Seattle City Light (SCL) uses various strategies to anticipate and adjust to changing demands, development, and population growth. Despite recent population growth, overall demand for SCL service has remained relatively stable. Future affordable housing development related to this proposal could result in localized increases in demand for electricity compared to existing regulations, particularly for a given site developed at a greater density than otherwise allowed. Development projects that require electrical service beyond the capacity of currently available infrastructure at the site may trigger required utility upgrades, possibly including undergrounding of overhead electrical transmission infrastructure. The developer would typically bear the cost of such upgrades.

The proposal could result in taller affordable housing structures than allowed under existing regulations in zones where zero lot line development is allowed. Structures in these zones can sometimes interfere with SCL's aerial distribution infrastructure. The proposal would increase height limits for affordable housing on certain sites and taller structures than otherwise allowed under existing regulations, which could result in greater adverse impacts on SCL's distribution system. In such cases, SCL would require the development project to relocate its distribution infrastructure underground, including communication infrastructure that shares the aerial system. Specific impacts related to future development would be identified on a site-by-site basis and addressed through the permitting process.

Seattle Public Utilities

Additional residential development related to the proposal is not likely to adversely impact the ability of Seattle Public Utilities to provide water, sewer, drainage, and waste treatment services. Future affordable housing development allowed under this proposal could generate incrementally greater demand for these services. In multifamily and mixed-use areas, this increase in demand is likely to fall within the range of SPU supply and demand models that inform planning and investment decisions. In single-family zones, denser development on eligible sites could require additional utility service or infrastructure upgrades. Most affordable housing developments would not be likely to cause excessive demands on local water and sewer systems. In a worst-scenario, a larger affordable housing development could conceivably generate water and sewer demands at levels that might challenge local systems' pipe capacities. These situations would be addressed through regulation and/or project-specific environmental review. Upgrades would generally be a cost borne by the developer as part of the entitlement process. This depends on highly localized and specific characteristics of pipe sizing and condition across many parts of the city where affordable housing development related to this proposal could occur.

Water. In general, increased density resulting from the proposal could impact SPU's water distribution system by necessitating watermain extensions, new taps, new hydrants, new meters, and accommodations to fire flow or zoned water pressure, as needed. However, existing codes, policies, and SPU practices already address these matters, and SPU is equipped to accommodate new water services and increased customer demand resulting from increased population growth and/or greater density.

Drainage and wastewater. Given the relatively limited numbers of properties that could take advantage of the proposed provisions, coupled with their dispersed ownership throughout the city, the proposal is unlikely to generate any substantial adverse impact on SPU drainage and wastewater facilities.

Solid waste. SPU solid waste services are not likely to be adversely affected by the proposal. Relevant waste storage and access design requirements and service noise requirements for new multifamily development would continue to apply and be likely to result in adequate service outcomes.

Parks and recreation

The proposal would allow additional residential density on certain eligible faith-owned sites throughout Seattle. The affected area includes sites that vary in terms of amount, quality, and characteristics of available park, open space, and community center services in the vicinity. This includes areas identified as having an open space gap in the Seattle Parks and Recreation (SPR) [2017 Parks and Open Space Plan \(Resolution 31763\)](#). The gap analysis helps define SPR's long-term acquisition strategy, priorities for future property acquisition, development plans, and service provision.

As the area around existing parks and open space densifies, SPR responds by rethinking and reprioritizing its facilities and services in the vicinity. Residential development in areas identified as an open space gap leads SPR to modify its acquisition strategy. The proposal would not be likely to cause a significant adverse impact on SPR's ability to provide services to future development related to this proposal. A localized increase in demand for parks and open space could occur as future affordable housing development projects related to this proposal would unfold. This additional residential density could inform SPR's future acquisition strategy, factor into its prioritization tools, or lead SPR to modify the design of and/or services available at its existing facilities in the area. This would occur on an ongoing basis and in response to SPR's evaluation of the cumulative effects of overall growth in Seattle, of which future development related to this proposal would be a part.

Schools

Seattle Public Schools continually evaluates the potential impacts of new housing development as part of its regular enrollment planning and capital planning processes. After review of the proposal, Seattle Public Schools concludes that the potential increase in residential density that could result from the proposal is unlikely to lead to a substantial increase in school enrollment because properties eligible for the proposed provisions comprise only a small portion of overall land in Seattle. From a capital planning perspective, the proposal could potentially result in a localized incremental increase in housing within attendance area boundaries of schools that are already close to or over capacity. Additional residential density indirectly related to this proposal would inform and be accommodated through the district's capital planning and/or boundary adjustment processes. This would occur on an ongoing basis and in response to the district's evaluation of the cumulative effects of overall growth in Seattle, of which future development related to this proposal would be a part.

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

None proposed. Affordable housing development projects related to this proposal would be subject to review by the City, and local improvements to transportation, public services, and utility infrastructure could be identified and required through project-level development review. The proposal would partially mitigate the potential increased demand on transportation and public transit by allowing a greater increase in residential density on sites within a quarter-mile walk of frequent transit service, as defined in SMC Section 23.54.015, and limiting the increase in residential density in areas where frequent transit is not available and accessible.

Sources:

Transportation: MaryCatherine Snyder, Jason Fialkoff, Jill Macik (Seattle Department of Transportation)

Police: Angela Socci (Seattle Police Department)

Fire and emergency medical services: Ken Brouillette, Rich Richardson (Seattle Fire Department)

Seattle City Light: Stephen Crume (Seattle City Light)

Seattle Public Utilities: Kevin Burrell, Cristofer Horbelt (SPU Drainage & Wastewater); Maura Patterson (SPU Water); Hans VanDusen, Kahreen Tebeau (SPU Solid Waste)

Parks and recreation: David Graves (Seattle Parks & Recreation)

Schools: Jeanine Needles, Selam Misgano (Seattle Public Schools)

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

The proposal would fulfill requirements adopted by the Washington State Legislation in 2019 through Substitute House Bill 1377 (SHB 1377), which mandates that cities and counties planning under RCW chapter 36.70A must allow increased density, consistent with local needs for affordable housing, for long-term, income-restricted affordable housing development on real property owned or controlled by a religious organization. As required by SHB 1377, the proposal would provide this additional density for development in which 100 percent of dwelling units are reserved for low-income households whose income is less than 80 percent of area median income for at least 50 years.

The proposal is believed to avoid conflicts with other local, state, and federal laws or requirements for protection of the environment. See also the discussion of potential environmental impacts in part D.5 above.