



City of Seattle

Gregory J. Nickels, Mayor

Department of Planning and Development

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**CITY OF SEATTLE
ANALYSIS AND DECISION OF THE DIRECTOR
OF THE DEPARTMENT OF PLANNING AND DEVELOPMENT**

**SEPA Threshold Determination
for the
2008 Comprehensive Plan Annual Amendments**

Project Sponsor: City of Seattle Department of Planning and Development (DPD)

Location of Proposal: The amendments relate to the City's Comprehensive Plan, which pertains to the entire City.

BACKGROUND

Proposal Description

The proposal consists of several amendments to the Comprehensive Plan, as summarized below.

Re-connecting First Hill and Capitol Hill to Downtown Over I-5

A. Add a policy seeking opportunities to re-establish connections between Downtown and Capitol Hill/First Hill by constructing lids over I-5 that can also provide development opportunities and open space.

Relocate Sand Point Policies

B. Remove Sand Point Policies (known as the "Sand Point Amendments") from Comp Plan, to be bound separately without substantive revision.

Livable South Downtown

C. Change the designation of land within the Downtown Urban Center from Industrial to Commercial Mixed Use on the Future Land Use Map.

D. Amendments to allow establishment of a South Downtown Historic Transfer of Development Right (TDR) Program

South Lake Union

- E. Change the designation of land within the South Lake Union Urban Center from Industrial to Commercial/Mixed Use.

Safe Access to Transit Stops

- F. Add a new policy regarding street crossings where necessary to provide safe access to transit stops and stations.

Reducing Trips and Vehicle Miles Traveled in and Through the City

- G. Add a goal of reducing vehicle miles traveled in and through the city.

Affordable Housing Action Agenda

- H. Add a new policy in support of sufficient density and incentives near transportation hubs to help foster affordable housing.
I. Add a new policy requiring sufficient investments in infrastructure and amenities in areas where density is likely to increase, e.g., near light rail stations.
J. Add a new goal of implementing strategies and programs to help ensure a range of housing opportunities affordable to those who work in Seattle.
K. Amend existing land use policies to seek opportunities to provide affordable housing when development regulations change or when land is rezoned.

Additional Priority Uses for Surplus City Properties

- L. Amend existing open space policies to include parks, forested areas, and viewpoints among the priority uses for surplus City properties.

Anticipating the Effects of Climate Change

- M. Add a new goal and policy directing the City to anticipate the effects of climate change and to plan for adapting to those effects.

ANALYSIS - OVERVIEW

The following describes the analysis conducted to determine if the proposal is likely to have a probable significant adverse environmental impact. This threshold determination is based on:

- the proposal, as described above and in memoranda;
- the information contained in the SEPA checklist;
- additional information, such as analyses prepared by City staff; and
- the experience of DPD analysts in reviewing similar documents and actions.

ELEMENTS OF THE ENVIRONMENT

Adoption of the possible amendments would result in no immediate adverse short-term impacts because the adoption would be a non-project action. The discussion below generally evaluates the potential long-term impacts that might conceivably result from differences in future development patterns or other physical environmental implications due to the proposed amendments.

Natural Environment

Earth, Air, Water, Plants and Animals, Environmental Health

Re-connecting First Hill and Capitol Hill to Downtown Over I-5.

Item A relates to adding a neighborhood plan policy to the Comprehensive Plan seeking opportunities to re-establish connections between the First Hill/Capitol Hill Urban Center and Downtown by constructing lids over I-5. As a non-project action involving a prospective policy statement, no direct impacts to the environment would occur.

A key question is whether this new policy statement results in any meaningful differences in future development patterns that could generate significant adverse impacts to the natural environment. Even though the new policy does not necessitate development activity, it could have a relationship to future growth, in that future decisions could subsequently be made that would encourage additional growth or different growth patterns in the affected areas of First Hill, Capital Hill, and Downtown. Therefore, Item A should be examined with respect to potential natural environmental impacts.

In reflecting upon the status of City codes and regulations that protect water, environmental critical areas and habitat, and those that regulate land use and zoning, there is minimal potential for long-term significant adverse natural environmental impacts due to the proposed change. In the locations potentially affected by Item A, the character of the environment is already relatively dense and urban-style development with fully developed infrastructure networks, and only a limited area in steep slopes. In that context, environmental impacts are largely confined to grading of single properties largely within the WSDOT right-of-way along I-5, where potential stormwater runoff-related impacts, such as erosion, sedimentation and pollutant loading, may reach local stormdrains and sewers. City regulations define how those impacts can be avoided or minimized through implementation of construction controls. Steep slopes would be protected by the City's environmental critical areas regulations.

From a regional perspective, the proposed changes would tend to support growth and improved access between two major urban centers, one of which is a major regional employment destination. On this basis, the new policy could ultimately have positive natural environmental implications in avoiding environmental impacts of sprawling development in far-flung locations.

For Item B, relocating the Sand Point Amendments without substantive revisions, and Item L, amending open space policies to include parks, forested areas and viewpoints among the priority uses for surplus City properties, no significant adverse impacts are identified for these largely procedural actions. To the extent that surplus properties that are naturally vegetated could experience some trail or viewpoint construction if they were defined for recreational or viewpoint activities, there would be some potential for additional disturbance of land and plant/animal habitat.

Reducing Trips and Vehicle Miles Traveled in and Through the City

Item G would add a goal to the Environment Element of reducing trips and vehicle miles traveled in and through the city. As a non-project action involving a prospective policy statement, no direct impacts to the environment would occur. Again, there is a basis for analyzing whether the new goal would result in meaningful differences in future development patterns that could generate significant adverse impacts to the natural environment. Because the new goal establishes a benchmark for measuring travel behavior that is already the subject of numerous existing goals and policies, minimal additional influence is anticipated on the relationship between the proposed goal and City or State highway and transportation decisions. The effect of programs and City decisions in support of achieving a reduction in trips and vehicle miles traveled could include greater emphasis on alternative modes of travel, such as public transit, ridesharing, and bicycling and pedestrian infrastructure, on programs promoting trip consolidation, and on compact, organized development patterns that can reduce reliance on vehicle trips. On this basis, the new goal would tend to avoid adverse environmental impacts that could occur due to dispersed, auto-oriented development and over-reliance on commuting by automobile.

Affordable Housing Action Agenda

Items H through K, adding and amending goals and policies to foster more affordable housing in Seattle, generally reinforce Comprehensive Plan policies encouraging denser infill growth within urban centers, urban villages, and near transit hubs. The net result of these changes could be an increase in both the ultimate density achieved and the amount of public investment in infrastructure in these areas. If strategies and programs to ensure a range of housing options are available are successful, there is minimal potential for long-term significant adverse natural environmental impacts resulting from these proposed changes. In the locations affected by the four Affordable Housing Action Agenda items, the character of the environment is already relatively urban with fully developed infrastructure networks. In that context, environmental impacts are largely confined to grading of single properties with new development and the stormwater runoff-related impacts that can potentially occur, such as erosion, sedimentation and pollutant loading into local storm drains and sewers. City regulations define how those impacts can be avoided or minimized through implementation of construction controls. From a regional perspective, the proposed changes would generally support growth in urban areas of Seattle, which would tend to avoid environmental impacts of sprawling development in far-flung locations.

Built Environment

Land and Shoreline Use, Height/Bulk/Scale, Housing

Re-connecting First Hill and Capitol Hill to Downtown Over I-5.

Item A relates to adding a neighborhood plan policy to the Comprehensive Plan seeking opportunities to re-establish connections between the First Hill/Capitol Hill Urban Center and Downtown by constructing lids over I-5. As a non-project action, no direct impacts to the environment would occur. According to City staff, there are no plans to construct lids over I-5 for purposes of future development or open space. Assuming specific plans and funding opportunities for one or more lids over I-5 will arise in the future, those projects will be subject to environmental analysis. The indirect result of the new policy could therefore be a potential increase in the ultimate density achieved in the First Hill/Capitol Hill Urban Center and the Downtown Urban Center, which would reinforce the overall strategies for growth that the City has adopted, indicating a general consistency with the approach of the City's Comprehensive Plan. Such lids would also provide connective elements at "surface" level that would tend to smooth transitions between these neighborhood areas, which is generally interpreted as a positive in urban design terms. No significant adverse land use or housing impacts are identified.

Access to Transit Stops

Item F consists of a new transportation policy to provide street crossings where necessary to help provide convenient access to transit stops and stations, particularly on roadways with more than one travel lane in any direction. As a non-project action, no direct impacts to the environment would occur. If it is adopted, pedestrian improvement projects that could potentially result from the policy, while enhancing safety, would have no appreciable impact on road systems.

Reducing Trips and Vehicle Miles Traveled in and Through the City

Item G, as a non-project action, is not anticipated to have any direct impacts to the built environment. There is a basis, however, for analyzing whether the new goal would result in meaningful differences in future development patterns that could generate significant adverse impacts to land use, the height, bulk and scale of structures, and housing in the city. Programs and regulatory changes that might indirectly result from this policy will seek to discourage activities that rely on vehicle trips while encouraging activities and development patterns that help reduce them. Discouraging vehicle trips, whether through pricing or regulation, may have the effect of increasing demand for land located where businesses and households can thrive with reduced reliance on vehicle trips. This increase in demand may lead to higher prices for commercial and residential space in these locations and greater pressure to increase allowed height and density in the future. The anticipated effect of programs and regulatory changes to reduce vehicle miles traveled will be to direct new growth into more urban areas of Seattle, which reinforces the overall strategies for growth in the City's Comprehensive Plan. Therefore, no significant adverse land use impacts are identified.

Land and Shoreline Use, Height/Bulk/Scale, Housing

Affordable Housing Action Agenda

As non-project actions, no direct impacts to the built environment would occur as a result of the four proposed Affordable Housing Action Agenda items (items H through K). While the proposed goals and policies do not necessitate specific zoning changes or development activity, they could have a relationship to future growth by influencing future decisions that would encourage additional growth or different growth patterns in urban centers, in station area overlay districts and near transportation hubs. Therefore, each item should be examined with respect to potential impacts to the built environment.

Item H, adding a new policy in support of sufficient density and incentives near transportation hubs, could lead to an increase in both the ultimate density achieved and the amount of public investment in infrastructure in these areas. Some of these impacts will occur in urban centers that are already relatively dense with an established urban form characterized by a varied mixture of land uses and large structures. Other impacts will occur in station area overlay districts where an urban form suitable for added density is not currently as well established. City regulations and development standards will address the impacts of additional height, bulk and scale in station areas as new structures replace existing stock of commercial and residential buildings, therefore anticipated increases in height, bulk and scale will likely be sufficiently mitigated. Because the proposal is intended to increase the supply of affordable housing, adverse impacts on the supply of housing opportunities are not likely to occur.

Item I adding a new policy that requires sufficient investment in infrastructure and amenities where density is likely to increase is not anticipated to have more than short-term adverse impacts on the built environment. City regulations with regard to managing construction impacts could mitigate these short-term impacts. Viewed in conjunction with the other Affordable Housing Action Agenda proposals, the new policy to require sufficient infrastructure and amenities supports the Comprehensive Plan's objective of directing City investments first toward those areas where the greatest growth is anticipated.

Item J, a new goal of ensuring a range of housing opportunities affordable to people who work in Seattle, if successful, could result in an increased supply of housing, a shift in the type of new housing toward units affordable to households earning from 80% to 120% of the median income, or a combination of these impacts. To the extent that the new goal leads to strategies and programs that result in an increase in the number of new housing units over what would have been built otherwise, the height, bulk and scale of development is likely to increase. City regulations and development standards, such as those specifying allowed uses and requiring transitions to adjacent, less intensive zoning designations, could mitigate the adverse impacts on the built environment that may result from an increased supply of housing.

Item K amending existing policies to promote opportunities to use incentive zoning granting additional height or density in return for affordable housing could lead to increased height, bulk and scale impacts. Viewed in conjunction with the other Affordable Housing Action Agenda proposals, the potential impacts from Item K are partially mitigated by the impetus to direct the additional housing into urban centers and station areas in accordance with Comprehensive Plan policies for managing the impacts of growth. City regulations and development standards will further address the impacts from the additional height, bulk and scale of new projects that participate in planned incentive programs. Therefore, resulting impacts on the built environment are not expected to be significant.

Transportation, Public Services and Utilities

Re-connecting First Hill and Capitol Hill to Downtown Over I-5.

If Item A results in the construction of lids or wider bridges across I-5, then significant short-term disruptions to traffic through downtown on I-5, as well as to east-west traffic in the vicinity of the new lid or bridge could result. City regulations related to managing construction impacts and project conditions imposed under SEPA would generally mitigate these potential impacts on Seattle's transportation system. Due to these regulations, potential impacts that would indirectly result from the new policy are not expected to be significant.

Access to Transit Stops

Item F regarding street crossings near transit stops and stations could adversely impact the flow of vehicle traffic on affected streets, especially if crossings are equipped with pedestrian-activated signals. As a non-project action, however, no direct impacts to the environment would occur, and the proposed policy would generally place emphasis on one aspect of street design and transportation infrastructure, for which there are already many related goals and policies. City regulations and the Complete Streets design principles already require a comprehensive look at all modes of travel within the right-of-way. Consequently, the new policy is unlikely to contribute to significant adverse impacts on transportation.

Reducing Trips and Vehicle Miles Traveled in and Through the City

Item G would add a goal to the Environment Element of reducing trips and vehicle miles traveled in and through Seattle. Programs and regulations that successfully reduce vehicle trips and mileage will necessarily affect demand on the existing transportation infrastructure, largely by reducing trips, consolidating necessary trips into less frequent trips (but organized to visit multiple destinations), and by shifting travel demand away from privately owned vehicles toward public transit, bicycling, and walking. Increased investment in public transportation and other alternatives will be required to sustain any reductions in vehicle trips and miles over time. Certain public services will need to be reorganized, and possibly dispersed across the city in order to bring them closer to customers. Some adverse impacts will be mitigated by the reallocation of spending from one economic model (centralized public services and workplaces, and single-purpose trips) to another (dispersed public services, telecommuting/remote offices,

and multiple-destination trips). The new goal, however, is a benchmark for progress in meeting numerous existing goals and policies in the Comprehensive Plan supporting more efficient land use patterns, alternative transportation choices that reduce reliance on the private automobile, and a focus on moving people and goods instead of people. Therefore, the new goal is not likely to have a significant adverse impact on transportation or the provision of public services.

Affordable Housing Action Agenda

Items H through K, adding and amending goals and policies to foster more affordable housing, will, if successful, increase the supply of housing overall as well as shift some of the new units that would have been built without the new goals and policies toward households serving householder earning closer to the median income. Anticipated impacts on transportation, public services, and utilities from addition of housing units will be partially mitigated due to the focus on increasing density in urban centers where transportation, public services and utilities can be more efficiently delivered, and in station areas where transportation service should be excellent and where delivery of public services and utilities are already expected to face increased demand. City regulations and programs, such as requiring transportation mitigation payments, will further mitigate potential adverse impacts. Existing Comprehensive Plan policies seek to increase the supply of affordable housing without linking increases to infrastructure and amenity investments. Because the Affordable Housing Action Agenda goals and policies direct new affordable housing to be located near transit and to be accompanied by sufficient investments in infrastructure and amenities, increased demand on transportation, public services and utilities will be partially mitigated in comparison to new affordable units that would have occurred under existing affordable housing targets. Therefore, new housing and development that may occur as an indirect result of the proposed goals and policies is not anticipated to have a significant adverse impact.

Anticipating the Effects of Climate Change

Item M, a new goal and policy directing the City to plan for the effects of climate change, could affect City priorities for replacing or developing new infrastructure used to provide public services and utilities. The scope of how climate change will affect the city and its region is largely unknown, but could include rising sea levels and changes to weather patterns possibly resulting in prolonged drought conditions and more frequent severe storm events. The new goal and policy could indirectly lead to increased costs associated with such measures as relocating utilities further upland, building near-term redundant capacity in anticipation of long-term conditions, and developing new sources of water and power. The increased costs could adversely affect service capacity for contemporary users of public services and utilities. The proposed goal and policy call for planning the city's preparation, however, and the potential indirect adverse impact can be mitigated by planners' capacity to identify emerging trends and develop accurate forecasts of the effects of climate change.

DECISION

- Determination of Non-Significance. This proposal has been determined to not have a significant adverse impact upon the environment. An EIS is not required under RCW 43.21C.030. (2) C.
- Determination of Significance. This proposal has or may have a significant adverse impact upon the environment. An EIS is required under RCW 43.21C.030(2)(c).

Signature: _____ (signature on file)
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Department of Planning and Development

Date: August 11, 2008