

CITY OF SEATTLE

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

**SEPA Threshold Determination
for the
2009 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.

SUMMARY OF PROPOSED ACTION

The proposal comprises several amendments to the Comprehensive Plan.

The following approval is required:

SEPA - Environmental Determination - Chapter 25.05, Seattle Municipal Code.

SEPA DETERMINATION Exempt DNS MDNS EIS

DNS with conditions

DNS involving non-exempt grading or demolition or involving another agency with jurisdiction.

BACKGROUND

Proposal Description

The proposed amendments to the Comprehensive Plan are summarized below:

A. Amend the Rainier Beach Neighborhood Plan

Adjust the boundary of the Rainier Beach Residential Urban Village to include an area south of S Henderson St between MLK Way S and the Chief Sealth Trail.

B. North Beacon Hill Neighborhood Plan Update Placeholder

Revise Neighborhood Planning Element goals and policies, and change Future Land Use Map (FLUM) to reflect new urban village boundary to reflect potential zoning issues and other revised neighborhood priorities.

C. North Rainier Neighborhood Plan Update Placeholder

Revise Neighborhood Planning Element goals and policies, and change the FLUM to reflect new urban village boundary, potential zoning issues and other revised neighborhood priorities.

D. MLK at Holly (Othello) Neighborhood Plan Update Placeholder

Revise Neighborhood Planning Element goals and policies.

E. Roosevelt FLUM and Neighborhood Plan Amendment

Amend the FLUM in the Roosevelt Residential Urban Village in anticipation of a zoning proposal developed by the Department of Planning and Development and the Roosevelt Neighborhood Association consistent with the Roosevelt Neighborhood Plan.

F. Shoreline Master Program

Amend goals and policies as part of overall update to Shoreline Master Program.

G. South Downtown FLUM Amendment

Amend the FLUM to redesignate some areas east of Interstate 5 from Commercial/Mixed Use to Downtown.

H. Northgate Neighborhood Plan Amendments

Amend policies in the Northgate Neighborhood Plan to identify locations where future increases in development density would be appropriate and the to address some of the issues associated with more dense development in the northern part of this urban center.

I. Interbay BINMIC Amendment

Amend the FLUM to remove land located north of Dravus in the Interbay area from the Ballard Interbay Manufacturing / Industrial Center (BINMIC).

J. Reduction in Vehicle Miles Traveled

Add a numeric goal for reducing vehicle miles traveled in and through the city, and a policy favoring highway projects producing little or no increase in vehicle miles traveled.

K. Amend Use of Building 9 at Sandpoint

Amend Sand Point policies to allow housing and limited commercial uses in Building 9 at former Sand Point Naval Station.

L. Yesler Terrace FLUM Amendment

Amend the FLUM to redesignate the Yesler Terrace site from Multifamily Residential to Commercial/Mixed Use.

M. Affordable Housing Action Agenda

Add policies that promote housing affordability.

N. Cultural Overlay District Advisory Committee

Add new policies to encourage establishment of cultural districts, and to define regulations and incentives that would implement goals of those districts.

O. Greenwood Residential Urban Village FLUM and Neighborhood Plan Amendment

Amend the Greenwood-Phinney Ridge Neighborhood Planning Element and the FLUM in the Greenwood/Phinney Ridge Residential Urban Village area to permit zoning proposals for an area near the existing Fred Meyer block.

P. Industrial Land in Ballard Hub Urban Village

Consider FLUM amendments related to industrial land in the Ballard Urban Village, in anticipation of the zoning recommendations from the Department of Planning and Development.

Public Comment

Since this SEPA analysis and decision is not subject to the procedural requirements of SMC Chapter 23.76, public notice is not required for the proposal and accordingly there are no public comments.

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.

Proposed amendments related to the Neighborhood Plan Updates in the North Beacon Hill, North Rainier and the MLK at Holly (Othello) neighborhoods (items B, C and D above) will be analyzed in a separate document. Proposed amendments related to the Shoreline Master Program (item F above) will be subject to separate environmental analysis and separate Council action.

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

Neighborhood Plan and Future Land Use Map Amendments, Including Changes to Urban Village Boundaries

- A. Amend the Rainier Beach Neighborhood Plan**
- E. Roosevelt FLUM and Neighborhood Plan Amendment**
- G. South Downtown FLUM Amendment**
- L. Yesler Terrace FLUM Amendment**
- O. Greenwood FLUM and Neighborhood Plan Amendment**

P. Industrial Land in Ballard Hub Urban Village

Items A, E and O relate to changes to the Future Land Use Map, with corresponding changes to applicable neighborhood plan policies, that support anticipated proposals to rezone property from single-family to another zoning designation. As non-project actions involving a prospective policy statement, no direct impacts to the environment would occur. A key question, however, is whether any of these new policy statements result in any meaningful differences in future development patterns that could generate significant adverse impacts to the natural environment. Even though the new policies do not necessitate development activity, they 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 Rainier Beach, Roosevelt and Greenwood. Therefore, Items A, E and O 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 area of Rainier Beach potentially affected by Item A, the character of the environment is moderately developed, between Seattle City Light power transmission lines (the Chief Sealth Trail) to the east and Martin Luther King Jr. Way S. to the west. The western portion of the area has steep slopes and most of the site is located in a potential slide area. Yukon Ave. S. and S. Director St. would require new pavement, sidewalks and drainage in the right-of-way. The area features non-native fruit and nut trees and an arborist report would be required for any development. In that context, potential environmental impacts would include grading, installation of pavement, sidewalks and drainage infrastructure, removal or relocation of some of the existing trees, and short-term construction impacts associated with construction. There would thus be some potential for additional disturbance of land and plant/animal habitat. 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.

In the locations potentially affected by Item E and O, the character of the environment is already relatively dense, with neighborhood business district-style development associated with historic Interurban streetcar stops, and fully developed infrastructure networks with no affected area in steep slopes. More than half of the affected area in Greenwood (Item O) is located on a Category 1 peat settlement-prone area. Development in those areas within Greenwood will be required to perform geotechnical analysis and construction will be, among other limitations, prohibited below the annual high static groundwater level. City regulations set forth ways to avoid and minimize those environmental impacts. Sidewalks will need to be installed in the Greenwood areas pursuant to the Right-of-Way Improvements Manual and other codes and regulations. Beyond potential impacts associated with peat-settlement prone areas in Greenwood, environmental impacts resulting from items E and O are generally limited to short-

term impacts caused by construction activities. City regulations define how those short-term impacts can be avoided or minimized through implementation of construction controls.

In the potentially affected areas within South Downtown and in Yesler Terrace (items G and L), the character of the environment is already relatively dense and urban-style development with fully developed infrastructure networks, and a relatively limited area in steep slopes. In that context, potential environmental impacts are largely confined to grading of single properties largely within the Washington State Department of Transportation (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.

The proposed changes in Rainier Beach and Roosevelt (Items A and E) are intended to facilitate development near light rail stations that will provide access to Downtown and other major urban centers along the route. The proposed changes in Yesler Terrace and South Downtown are intended to facilitate the development of housing jobs within the Downtown and First Hill/Capitol Hill Urban Centers. From a regional perspective, these FLUM and neighborhood plan amendments could ultimately have positive natural environmental implications in avoiding environmental impacts of sprawling development in far-flung locations.

In the area of Ballard potentially affected by Item P, the character of the environment is already relatively dense, with industrial and commercial development and fully developed infrastructure networks. A small area is affected by a moderately steep slope. Steep slopes would be protected by the City's environmental critical areas regulations. Environmental impacts resulting from Items P are generally limited to short-term impacts caused by construction activities. City regulations define how those short-term impacts can be avoided or minimized through implementation of construction controls.

H. Northgate Neighborhood Plan Amendments

Item H, delineating a North Core Subarea where potential rezones to higher intensity will be considered and encouraging enhanced pedestrian connections, as a non-project action involving a prospective policy statement, will have no direct impacts on the environment. In view of applicable 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. From a regional perspective, if Item H encourages additional density in a compact, walkable neighborhood with an urban center, it could ultimately have positive natural environmental implications in avoiding environmental impacts of sprawling development in far-flung locations.

J. Reduction in Vehicle Miles Traveled

Item J would establish numeric goals for reducing vehicle miles traveled in and through the city. Although DPD recommends against adoption of numeric goals until further analysis is performed in cooperation with state officials, potential impacts from the proposal bear consideration due to the possibility that the City Council may choose to adopt such goals. 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.

K. Amend Use of Building 9 at Sand Point

Item K is intended to allow adaptive reuse of an existing building at Sand Point. As a non-project action involving a prospective policy statement, Item K will have no direct impacts on the environment. Environmental impacts resulting from Item K are generally limited to short-term impacts caused by construction activities during remodeling of Building 9. City regulations define how those short-term impacts can be avoided or minimized through implementation of construction controls.

M. Affordable Housing Action Agenda

Item M, adding and amending policies to encourage consideration of the availability of public transit to new housing when making planning and public investment decisions, and encouraging detached accessory dwelling units, is intended to foster more affordable housing in Seattle. It generally reinforces Comprehensive Plan policies encouraging denser infill growth within urban centers, urban villages, and near transit hubs. As a non-project action involving a prospective policy statement, no direct impacts to the environment would occur. To the extent that it steers new housing into areas already served by transit, it should have minimal impacts on the natural environment because these are likely to be already-developed areas of Seattle. The amended policies encouraging attached accessory dwelling units support legislation already adopted by the City Council. If the policies increase the rate at which accessory units are built, Item M could potentially displace vegetation by increasing lot coverage in single-family areas, and lead to short-term impacts from construction activities. City regulations govern lot coverage and define how short-term impacts from construction can be avoided or minimized. Due to 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 new policy.

Built Environment

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

- A. Amend the Rainier Beach Neighborhood Plan**
- E. Roosevelt FLUM and Neighborhood Plan Amendment**
- G. South Downtown FLUM Amendment**
- H. Northgate Neighborhood Plan Amendments**
- L. Yesler Terrace FLUM Amendment**
- O. Greenwood FLUM and Neighborhood Plan Amendment**
- P. Industrial Land in Ballard Hub Urban Village**

As non-project actions, no direct impacts to the built environment would occur as a result of Items A, E, G, H, L, O and P. However, their status should be reviewed with respect to potential land use and housing-related impacts.

Items A, E, G, H, L, O and P would tend to reinforce trends encouraging denser infill growth within these urban villages and urban centers. The net result of these changes could be a relatively modest change in the ultimate density achieved in key parts of the identified areas, especially if future actions are taken to further encourage growth. However, in each case, these areas are either already relatively dense urban areas or are located near existing or planned light rail transit stations. Thus they are generally suitable for additional infill growth, and the resulting land use patterns are not expected to generate significant adverse land use or housing impacts. Additionally, the proposed actions would tend to reinforce the overall strategies for growth that the City has adopted, indicating a general consistency with the approach of the City's Comprehensive Plan.

J. Reduction in Vehicle Miles Traveled

Item J, 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 numeric goals 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 growth management strategies in the City's Comprehensive Plan. Therefore, no significant adverse land use impacts are identified.

M. Affordable Housing Action Agenda

As non-project actions, no direct impacts to the built environment would occur as a result of the Affordable Housing Action Agenda proposals (Item M). While the new and amended 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 near public transit facilities and single-family areas. Therefore, each item should be examined with respect to potential impacts to the built environment.

The new and amended policies that encourage consideration of the availability of public transit to new housing when making planning and public investment decisions could lead to an increase in both the ultimate density achieved and the amount of public investment in infrastructure near public transit. 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.

The amended policies within Item M encouraging attached and detached accessory dwelling units could indirectly increase the rate at which accessory units are built. City regulations and development standards govern height, bulk and scale of detached accessory dwelling units so there is minimal potential for long-term significant adverse natural environmental impacts due to the proposed new policy. Over the long term, these new units could increase the diversity and affordability of housing stock in the City.

N. Cultural Overlay District Advisory Committee

Item N would support the preservation and development of space for artists and arts-related cultural activities by encouraging the establishment of cultural overlay districts. As non-project actions, no direct impacts to the built environment would occur as a result of the proposed new and amended policies. These new policy statements could indirectly result in changes to future development patterns and thereby generate significant impacts to the built environment. Programs and regulations that preserve existing space could slightly reduce the rate at which new development replaces older, often smaller, buildings with new structures that build to the planned capacity of urban centers and urban villages. Programs for transferring the unused development potential to more suitable sites, however, can add to the diversity of uses and building types over

time. The varied demands of uses that can be characterized as arts or culture could lead to a more diverse built environment over time. The presence of arts and cultural amenities could make living and working in or near a cultural overlay district more attractive, and thus help foster and concentrate growth in urban areas to meet numerous growth management objectives.

Transportation, Public Services and Utilities

- A. Amend the Rainier Beach Neighborhood Plan**
- E. Roosevelt FLUM and Neighborhood Plan Amendment**
- G. South Downtown FLUM Amendment**
- H. Northgate Neighborhood Plan Amendments**
- L. Yesler Terrace FLUM Amendment**
- O. Greenwood FLUM and Neighborhood Plan Amendment**
- P. Industrial Land in Ballard Hub Urban Village**

As non-project actions, no direct impacts on transportation, public services, and utilities would occur as a result of Items A, E, G, H, L, O and P. Their potential indirect impacts share the intention of directing new residential development into areas with well-developed infrastructure, such as urban centers, station area overly districts, and urban villages. Items A, E and H (Rainier Beach, Roosevelt, and Northgate) are proposals made specifically in response to planned or existing light rail service. Items G and L (South Downtown and Yesler Terrace) would increase the number and density of housing, jobs and services in close proximity to the region's largest employment center, obviating many new households' need to commute by automobile and possibly reducing the number of vehicles per household. Anticipated impacts on transportation, public services, and utilities from additional residential and nonresidential development that may result from Items O and P (Greenwood and Ballard) will be partially mitigated due to the focus on increasing density in urban villages so that they offer a broader array of goods, services and employment opportunities in a compact area. As an indirect result of the listed proposals, a higher proportion of future growth should occur in urban centers and villages 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.

J. Reduction in Vehicle Miles Traveled

Although not recommended by DPD for adoption, Item J would add a numeric goal to the Environment Element for reduction of vehicle miles traveled in and through Seattle. If adopted, a key consideration is whether the numeric goals would change the effectiveness of existing City and community programs and regulations that seek to reduce vehicle trips and mileage. To the extent that numeric goals might make Seattle's efforts more effective, the proposal will necessarily affect demand on the existing transportation infrastructure. It would do this 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). Progress toward meeting a numeric goal would be a rubric for evaluating the progress in meeting numerous existing goals and policies in the Comprehensive Plan that support 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 vehicles. The new goal is therefore not likely to have a significant adverse impact on transportation or the provision of public services.

M. Affordable Housing Action Agenda

Item M could potentially shift some of the new units that would have been built without the new policies toward areas where transportation, public services and utilities can be more efficiently delivered, and in station areas that offer the widest array of transportation service and where expansion of public services and utilities is a higher growth management priority. In contrast with regard to transportation, the proposed amended policies supporting detached accessory dwelling units could indirectly lead to new units outside of urban villages and station areas. City regulations govern off-street parking and help manage the on-street parking supply for optimum use. 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.

DECISION

- [X] 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: _____ Date: _____
William K. Mills, Senior Planner
Department of Planning and Development