



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

Project Name: Parking code amendments proposal (Reg Reform Ordinance #2)

Applicant Name: City of Seattle - Department of Planning and Development

Address of Proposal: Elements would affect multifamily residential and non-residential zones within walking distance of transit service throughout the city

**SUMMARY OF PROPOSED ACTION**

The Department of Planning and Development is proposing to amend the Land Use Code (Title 23) to eliminate parking requirements in certain zones in areas where frequent transit service is available, and for Major Institutions in urban centers.

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 another agency with jurisdiction.

**Background and Proposal**

The Department of Planning and Development (DPD) is proposing to amend the Land Use Code (Title 23). The amendments are intended to help stimulate growth and development consistent with the City's Comprehensive Plan.

The amendments would reform minimum parking requirements in all areas where frequent transit service is available outside of Urban Centers and Station Area Overlay Districts, by extending no-minimum parking requirements to any use in any other portion of the city that is within ¼ mile of frequent transit service. This would affect Urban Village areas as well as other areas that are not designated as centers or villages. Frequent transit service is determined by formulas defined by Seattle Department of Transportation (SDOT) and DPD.

Also included in the proposal is the extension of no-minimum parking requirements to new development on Major Institution properties in Urban Centers and Station Area Overlay Districts. Such requirements for developments on Major Institution properties are currently calculated for each new development proposal when it occurs and with reference to campus-wide parking deficits or surpluses also calculated at the time of the development proposal. By accommodating the possibility of no minimum parking for a new major institution development, possible cost and design impediments to new development can be removed, but with the continued ability for an institution to make parking choices that will be suited to serving their demands and avoiding potential oversupply of parking.

This proposal represents a continuation of trends in the City's code development promoting smart growth, which include allowing the amount of parking provided in new development to be tailored to the needs of the intended residents or workers where dense infill growth is especially encouraged by the City's growth management efforts, and similarly in other parts of the city where frequent transit service is within a ¼ mile walking distance. This would help avoid parking oversupply and associated consumption of space that would be better used to accommodate new residential or non-residential uses in more efficient patterns. Because parking is expensive to build and can be an impediment to pedestrian-oriented design, this proposal will improve the financial feasibility of development and encourage new growth to occur sooner, including new housing resources and space for new employment opportunities.

### **Public Comment**

Proposed changes to the Land Use Code require City Council approval. Public comment will be taken on the proposed amendments at a future City Council Public Hearing.

### **ANALYSIS - SEPA**

This proposal is an adoption of legislation, which is defined as a non-project action. This action is not categorically exempt (SMC 25.05.800). A threshold determination is required for any proposal that meets the definition of "action" and is not categorically exempt.

The disclosure of the potential impacts from this proposal was made in an environmental checklist submitted by the applicant dated July 7, 2011. The information in the checklist, the Director's Report and Recommendation, other information provided by the applicant, and the experience of the lead agency with review of similar regulations and proposals, form the basis for this analysis and decision.

### **ELEMENTS OF THE ENVIRONMENT**

Adoption of the recommended Code amendments would result in no immediate adverse impacts because the adoption would be a non-project action. The discussion below evaluates the potential for significant adverse environmental impacts that could conceivably occur as a result of the proposed amendments, using a programmatic-level impact evaluation approach meant to disclose potential long-term and cumulative impacts.

The elements of discussion presented below reflect interpretation of the net difference that the proposal's contents could make on future development/use patterns, and also interpretation of whether the net differences would create added potential for adverse or significant adverse environmental impacts. The discussion highlights what are believed to be the most salient interpretive points about the potential for adverse impacts, but inclusion of these points does not mean they are evaluated as significant adverse impacts.

## **Natural Environment**

### **Earth, Air Quality, Water (Drainage, Water Quality), Plants and Animals, Environmental Health**

#### **No minimum parking proposals**

Enabling the provision of less parking in future new development in Major Institutions' new developments in Urban Centers and Station Areas, and for residential and non-residential uses in other areas near frequently-served transit routes would encourage and likely result in less per capita generation of earth, water and habitat disturbance by future development. This would be due in part to a reduced need to excavate and/or fill for future buildings to provide underground parking or surface parking.

The proposal would also encourage and likely result in less per capita generation of air and water pollutant emissions over the long term – for example, tailpipe emissions, hydrocarbon emissions and other vehicle-related pollutant leakage that is washed off roads and into stormwater. This would be due to a probable reduction in reliance upon automobiles for travel in and around urban neighborhoods of Seattle where transit is available, on an average per capita basis. Also, to the extent that additional and more efficient residential and mixed-use development is encouraged in Urban Centers and station areas rather than in other more outlying parts of the region, there would be a probable lesser level of air pollutants emitted per unit of growth, due to differences in commuting choices and associated vehicle travel. This means the potential benefits of concentrating future growth (in Urban Centers, station areas, or otherwise near frequently-served transit routes) would include probable regional savings in air pollutant emissions and resultant lesser potential for significant adverse air quality impacts than if growth occurred in a more dispersed fashion. Thus, the potential for significant adverse natural environmental impacts from this element of the proposal would be minimal.

## **Built Environment**

### **Land Use, Relationship to Plans & Policies**

#### **No-minimum parking proposals**

The proposal would result in no direct impacts to land use-related elements of the environment because it is a non-project proposal. The proposal would aid in encouraging future development consistent with the intent of Comprehensive Plan policies and growth strategies, by encouraging denser mixed-use land use patterns within Urban Centers and Station Area Overlay Districts. Reductions in minimum parking requirements would not force less parking to be provided because they would retain the ability to provide as much as needed with few restrictions, but reduced parking amounts would be the likely outcome as developers would likely seek to more efficiently provide parking resources that are costly to build.

The probable effect on overall land use patterns in the city would be an increased incidence of development with lesser amounts of parking, which could reduce the visual appearance of surface parking lots and openings to underground parking lots. The proposal is also likely to increase the amounts of non-parking uses present at ground floors of future developments. To the extent that some developments choose to provide no parking or reduced parking, a pattern of street-oriented uses could become more prevalent in more street frontages with no space needed for driveways and garage door openings, and a pattern with less exposure of adjacent uses to

parking in the rear of buildings could also occur. The proposal could also lead to residential uses becoming more frequently present at ground level. This type of increasing variability in ground-level use patterns could lead to evolution of more varied land use patterns that would aid in land use transitions between residential-only blocks and commercial-only or mixed-use block patterns. No potential for significant adverse land use impacts is identified.

A proposal for no minimum parking requirement for major institutions' developments in Urban Centers and Station Area Overlay Districts would be expected to have little if any effect on area land use patterns or spillover land use impact potential. Major institutions' development capabilities are very influenced by master plan requirements; they cannot expand into adjacent properties at will. Land use effects related to differential parking provision are not interpreted as a probable or significant adverse impact outcome, and might in fact lead to reduced exposure of nearby uses to surface parking lots over time, due to a possible lesser need for parking as a land use. Such institutions would likely continue to provide levels of parking to meet demands at levels their leadership or financing partners would identify as needed, and could also continue to benefit from available parking surpluses if present.

### **Public View Protection, Shadows on Open Spaces, Historic Preservation**

#### **No minimum parking proposals**

These proposed requirements would be expected to generate minimal adverse impact potential, due to a minimal relationship to these elements of the environment. To the extent that having no minimum parking requirement in major institutions and other properties would afford flexibility, it could possibly assist in avoiding impacts to landmark facilities because lesser space could be devoted to parking uses.

#### **Noise, Light/Glare**

#### **No minimum parking proposals**

There is a slight but unconfirmed potential for additional noise and light/glare impacts as a result of no-minimum parking requirements in the Land Use Code in Urban Centers, station areas and for major institutions developments. The premise for such possible increases would be that shortfalls in parking might occur and that more traffic would circulate in area streets looking for parking, generating more vehicle noise and light/glare. The probability that shortfalls in parking would occur would be low in part due to long-term trends toward lower vehicle ownership per capita, the ability for businesses or institutions to provide as much parking as would be believed necessary, probable increases in parking prices over time, parking controls such as residential parking zones (RPZs), and a probable upward trend in business and institutional users reaching an area via transit or non-motorized modes of travel.

Even if vehicle traffic circulation did increase in affected areas, the potential for significant adverse noise or light/glare impacts would be minor, due to the specific nature of how noise occurs and is measured, and a lack of a definitive relationship between increased traffic and the potential for light/glare impacts on any particular area property.

## **Transportation, Parking**

### **No minimum parking proposals**

Enabling the market to determine minimum parking provided for any area where frequent transit service is nearby would likely lead to lesser provision of parking than would otherwise have occurred, and in a manner that would likely be more efficient than in today's developments. This means that developers would be able to more consciously select the amount of parking provided based on the interpretation of probable actual demands and/or other factors such as parking amounts required by financing partners.

To the extent that future resident, employee and customer populations will probably seek more frequently to use transit and non-motorized modes of travel in the future, there is a relatively high probability of a reduced per-capita demand for parking over the long-term. This could also be affected by probable higher future parking costs (and which have already occurred through city metered parking rates). In short, if it is more difficult and costly for people to drive to a destination, they are more likely to seek alternate means of travel, which would moderate the potential magnitude of parking impacts. Similarly, residents in surrounding areas would be more likely to arrive by foot or bicycle, contributing to less per-capita reliance upon vehicles for travel. Also, additional off-site parking resources could be provided if the market for parking attracts new off-street parking provision.

Despite all these factors' probable efficacy in limiting on-street parking impacts, they would not eliminate the worst-case possibility that some areas could experience spillover parking impacts with future development. These potential impacts are interpreted as adverse but not significant adverse impacts, due to the potential that the factors described above (or other similar factors) would help mitigate and reduce the potential for significant adverse parking impacts.

The discussion above is also relevant to the proposal for no minimum parking requirement for future new developments in Major Institutions properties in Urban Centers and station areas. These institutions already have on-site parking in notable quantities, may have surplus parking available, and would likely make future parking choices for new development that would satisfy their perceived parking demands. Also, these major institutions already address transportation management through required transportation management plans that help to discourage single-occupant vehicle travel by employees and visitors. These institutions' performance in the existing condition, which appears to be reliably measured, indicate full or predominant compliance with transportation management plan targets, meaning efficient choices in vehicle travel are already occurring. It is most probable that such trends would continue into the future, especially for the major institutions that are located within Urban Centers where transit is most readily available.

### **Public Services, Utilities**

Over the long-term, the cumulative effect of the proposal on provision of public services and utilities is likely to avoid significant adverse impacts and could even generate positive impacts in a regional or citywide context, through encouragement of more efficient clustering of development in areas already served by city utilities and public services. This includes effects related to improved efficiency of building design that would likely occur if no-minimum parking requirements applied. The long-term development pattern supported by the proposal would likely be more efficient than other possible density patterns that might be more dispersed. This could mean that improvements to utility systems, if needed, would be more efficient to provide because

