

CITY OF SEATTLE

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

SEPA Threshold Determination for the 2015 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

Seattle's Comprehensive Plan

The City first adopted the Comprehensive Plan in 1994 and conducted a review and update of the Plan in 2004, extending the Plan's horizon to 2024 and planning for revised growth estimates. The Growth Management Act (GMA) calls the chapters of the Comp Plan "elements" and requires that all comprehensive plans include six elements – land use, transportation, housing, capital facilities, utilities and economic development. The Legislature also required the City adopt a port element. GMA also allows cities to add other elements, and Seattle has chosen to include elements related to urban villages, neighborhood planning, human development, cultural resources and the environment in the City's Plan.

Annual Amendment Process

The City has amended the Plan in most years since it was first adopted. The City follows a process each year for individuals, groups, and City departments to propose updates to address changing conditions so the plan will reflect new policy direction or new information. The Council then follows a two-step process. In the first step, the Council decides which of the suggested amendments should be examined further and adopts a resolution directing the Seattle Department of Planning and Development (DPD) to analyze those. After DPD completes its analysis, it works with the Mayor to prepare recommendations regarding amendments for the Council to consider. The Council reviews the Mayor's recommendations, holds a public hearing and adopts an ordinance amending the Plan.

In 2014, the Council received several suggestions for amending the Plan and adopted Resolution 31536 to identify particular suggestions for analysis and recommendation in this year's annual amendment cycle. The recommended ordinance would amend the Plan to incorporate some of those amendments.

Required Review and Update of Plan

The GMA requires that Seattle and other cities in King County review and if necessary update their comprehensive plans no later than June 30, 2015. The City has elected to combine the

annual amendment process with the periodic review and, if needed, update of the Comprehensive Plan. The GMA cites a number of items that must be included in a Comprehensive Plan in order for it to be complete. Much of the required content does not involve new policy directions, but rather focuses on providing specific information. This includes new citywide growth estimates for jobs and housing over the next 20 years, inventories of various City facilities and analysis of the transportation effects that could result from the expected growth.

DESCRIPTION OF AMENDMENTS

The proposal consists of several possible amendments to the Comprehensive Plan, as summarized below. The proposed amendments will be considered by the City Council likely in mid-2015.

A. Adoption of a package of Comprehensive Plan Amendments addressing compliance with GMA.

The recommended amendments address updates and revisions that are oriented to fulfilling required GMA information, including the following:

1. Updating the Comprehensive Plan to accept new growth estimates of 70,000 additional housing units and 115,000 additional jobs. This is the City's share of the region's projected housing and employment growth between 2015 and 2035, identified through the countywide process conducted by the Growth Management Planning Council.
 - a. Growth amounts proposed to be assigned for Seattle at the citywide level represent the city's share of King County's projected 20-year population and employment growth. The City plans its zoning and infrastructure to accommodate these targets.
 - b. Revisions to "Urban Village Figure 8" and removal of Urban Village Appendix A, are recommended to reflect the new population and employment projections; and
 - c. Other text edits to policies that are needed in policies that currently refer to growth targets, Urban Village Figure 8, or Urban Village Appendix A.
2. A recommendation to update growth assumptions for the City's urban centers and manufacturing/industrial centers. Urban centers are the largest type of places designated for growth, including Downtown, Capitol Hill/First Hill, South Lake Union, Uptown Queen Anne, University District and Northgate, and they are recognized in the regional growth management strategy.
3. Updated Comprehensive Plan elements and appendices for transportation, capital facilities, housing, utilities, economic development and land use to reflect the new population and employment projections and any changes in inventory or capacity, as needed.

The recommendations maintain the City's approach of accommodating citywide growth by continuing to use the urban village strategy, which has been the City's prevailing growth management strategy and primary urban planning principle for the past twenty years. As this does not represent a change in policy direction, it is not included as part of the actions evaluated in this proposal. But it is worth noting as supporting information that reflects on the nature of the individual actions being considered and their overall intent.

B. Amendment to neighborhood-specific policies in the Neighborhood Planning Element and amendments to the Future Land Use Map (FLUM) in the 23rd-Union/Jackson Residential Urban Village:

This set of proposed amendments arises from neighborhood planning efforts conducted by DPD with community stakeholders, meant to shape future development patterns and characteristics. The City Council is anticipated to review a legislative rezone action for affected areas in 2015. The FLUM changes would affect limited portions of the neighborhood, including two places just west of 23rd Avenue, along E. Cherry Street and along E. Union Street. The proposal includes the following:

1. Add policy language to the Central Area portion of the Neighborhood Planning Element to accommodate the possibility of redesignating certain land from 'single-family' to a 'commercial/mixed use' designation.
2. Recommended FLUM amendments will:
 - a. Re-designate a small area on the north edge of E. Cherry Street from Single Family to Commercial/Mixed Use.
 - b. Re-designate another area from Multi-Family Residential to Commercial/Mixed Use, located on the south side of E. Cherry Street, just west of properties along 23rd Avenue.
 - c. Expand the Urban Village boundary for the 23rd-Union/Jackson residential urban village to include an area west of 23rd Avenue and near E. Union Street. No land use designation change to these Commercial/Mixed Use parcels is proposed.

C. Amendment to neighborhood-specific policies in the Neighborhood Planning Element and amendments to the Future Land Use Map in the Morgan Junction Residential Urban Village:

This would affect property owned by the West Seattle Church of the Nazarene, in the Morgan Junction Residential Urban Village, located at 42nd Avenue SW and SW Juneau Street. The proposal addresses the following:

1. Modifications to language in Policies MJ-P6 and MJ-P13 would allow for very limited circumstances in which Single Family designated and zoned area could be reclassified away from Single Family.
2. Update the FLUM by:

- a. Re-designating less than one acre of land, currently occupied by a church and an associated residence, from Single Family to Multi-Family Residential on the west side of 42nd Avenue SW, in the northern portion of the Morgan Junction Residential Urban Village.

D. Amendment to neighborhood-specific policies in the Neighborhood Planning Element and amendments to the Future Land Use Map in the Lake City Hub Urban Village:

This set of recommended map changes arises from neighborhood planning efforts by DPD with community stakeholders, meant to encourage more pedestrian-friendly development, with the potential for future improvements in urban design. This would affect an area near NE 125th Street and 26th, 27th and 28th Avenues NE, the Lake City Library and Virgil Flaim Park. The recommendation would:

1. Revise policy language in the Lake City portion of the Neighborhood Planning Element to allow increased height, bulk or density in and around the neighborhood's civic core in limited circumstances.
2. Update the FLUM by:
 - a. Re-designating approximately 5 acres from Multi-Family Residential to Commercial/Mixed Use in the vicinity of NE 125th Street near 27th Avenue NE.

E. Amendments to Policies Addressing Environmentally Critical Areas: In 2014, the City updated its report on the best available science related to ECAs. Recommended amendments to these policies reflect new information in that report, as well as language changes to improve the clarity of existing policies. The amendments include recognition of peat settlements as a classification of ECA.

F. Amendments to Environment Element Policies Addressing Stormwater Drainage Management and Permeable Surfaces: Proposed revisions to the wording of Policies EP8.1 and EP10 would include more specific descriptions of intended purposes and targeted design components for EP8.1, including reference to low-impact development techniques, and broaden the language of EP10 and include a focus on removing unnecessary impervious surfaces.

G. Housing and Childcare Mitigation Amendments. These amendments clarify goals and policies related to mitigating housing and childcare impacts associated with new commercial and residential development. Specifically, the amendments remove language that sets out a policy whereby impacts associated with development below a base density or height are not mitigated.

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 the Director’s Report;
- 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 net differences in future development patterns or other physical environmental implications due to the proposed amendments. The analysis is organized to address each item’s impacts individually.

ITEM A – Comprehensive Plan Amendments for GMA Compliance

The proposed edits update the Comprehensive Plan to accept new 20-year growth estimates. The proposed amendments also identify portions of that growth as expected to occur within the Urban Centers and Manufacturing/Industrial Centers. These centers are recognized in regional planning efforts. The amounts of housing units and jobs allocated to the centers approximately reflect the distribution of growth that has occurred in the city over the past 20-year period, during the time when the Urban Village Strategy has been the preferred growth management organizing principle. The current proposal reflects that the Urban Village Strategy will continue to be the preferred growth management organizing principle going forward.

While policy and text revisions are being made to respond to the current status of planning efforts, they do not amount to a change away from the Urban Village Strategy that is the fundamental premise of the current Plan. Rather, the proposed revisions will primarily help to maintain internal consistency in various details, such as, for example, editing or deleting references to “growth targets” at the Urban Village level and preferred jobs/housing ratios that would be inaccurate if they remained.

The proposal also includes amendments to the Comprehensive Plan’s policies related to environmentally critical areas, using best available science and adding consideration of peat settlement areas, seismic and volcanic hazard areas.

BUILT ENVIRONMENT

Land Use, Height/Bulk/Scale, Housing

The City’s proposal acknowledges a commitment to plan for growth by adopting growth estimates of 70,000 additional housing units and 115,000 additional jobs over 20 years. The City is obligated through agreement with its regional government partners, and comprehensive plan goals such as UVG3, a central goal in the City’s Comprehensive Plan, which provides: *“Implement regional growth management strategies and the countywide centers concept through this Plan.”* The projections are derived from economic forecasts and follow-up discussion and evaluation by the Growth Management Planning Council (GMPC). The amounts of growth that Seattle accepts are established in the Countywide Planning Policies developed by the GMPC.

The proposed growth estimates for the Urban Centers are as follows:

Urban Center	Housing Units	Jobs
Downtown	10,000	30,000
First Hill/Capitol Hill	7,000	4,000
South Lake Union	4,700	20,000
Uptown	3,500	3,500
University District	2,700	8,000
Northgate	1,600	5,000
Greater Duwamish Manuf./Industrial Center	NA	3,000
BINMIC	NA	1,500

The total growth amounts of 70,000 additional housing units and 115,000 additional jobs to plan for from 2015-2035 compares to 47,000 households and 84,000 additional jobs identified for the period from 2004 to 2024. In the ten-year period since 2004, the City has added nearly 43,000 housing units and also about 43,000 jobs – meaning that the pace of housing growth has been faster than the 2004 targets suggested, while employment has been closer to the expected pace. The 70,000 housing units called for in the next 20 years is just slightly higher than the 67,000 housing units added in the past 20 years.

Notwithstanding that growth can occur in ways that help to achieve regionally and locally desirable efficiencies of land use that are considered more environmentally sustainable, there are potential adverse environmental impacts of more residential and job growth. Adverse impacts, typically interpreted as spillover effects or negative externalities, can occur such as:

- increased traffic volumes that lead to added road system congestion;
- land use relationships that have the potential to create incompatibility or contribute to adverse health effects (such as physiological effects from air or noise pollution);
- increased presence of building bulk or scale in the built environment that is interpreted as excessive; and
- increasing trends toward higher cost of housing.

The City’s land use controls, area zoning, and a wide range of planning and capital improvement efforts coordinated among City departments are meant to address many of these impacts by

providing improvements to the city over time, and by setting parameters for levels, and types of uses and development, that can occur throughout the city.

The impact analysis should identify substantive differences if the proposal is adopted, compared to impacts if the proposal was not adopted. In this case, the comparison between the proposal and following a “no-action” pathway does not yield any substantive differences.

- The existing zoned development capacity is well above the 70,000 additional dwelling units that the City has been allocated to accept by King County (*Development Capacity Report, 2014*).
- Item A does not require or propose any substantive changes in land use designations, zoning or regulations in order to implement it.
- DPD proposes to continue to follow the Urban Village Strategy as a primary organizing principle in its planning and management of future growth.
- The recommended Urban Center growth assumptions reflect distributions of growth that are similar to the distributions observed over the past twenty years.
- The citywide growth estimates are required by state law to be adopted.
- The recommended edits to policies will help keep the Plan up to date and do not contain any identified logical inconsistencies.

With no identified substantive difference between growth patterns that would occur if the recommended amendments are adopted, compared to growth patterns that would occur under a baseline “no action” scenario (e.g., what would happen if the proposal is not adopted), a conclusion is warranted that no incremental adverse environmental impacts are likely for these elements of the environment. This conclusion also encompasses the potential for indirect and cumulative impacts.

Historic Preservation

Future development within the planning period potentially could affect older buildings through demolition activities. While some of these older buildings might be candidates for historic landmark designation, the City would continue to follow policies and procedures for reviewing landmark eligibility prior to demolition. Also, existing designated historic landmark structures would continue to be protected by current City codes. It should also be noted that because there is no identified difference between future growth under the proposal versus under a baseline “no action” scenario, no new or different potential for adverse impacts are identified for this element of the environment.

Noise, Shadows on Open Spaces, Light/Glare

Future development within the planning period potentially could contribute to land use patterns that would generate adverse noise impacts, light/glare impacts, and shadows on open spaces. Noise regulations would continue to apply within the city in ways that define acceptable ranges of noises for different activities and times of day. However, it should also be noted that because there is no identified difference between future growth under the proposal versus under a baseline “no action” scenario, no new or different potential for adverse impacts are identified for this element of the environment.

Public View Protection

Future development within the planning period potentially could contribute to land use patterns that would generate adverse impacts upon public views from protected locations. However, it should be noted that because there is no identified difference between future growth under the proposal versus under a baseline “no action” scenario, no new or different potential for adverse impacts are identified for this element of the environment.

Transportation, Parking

Future development within the planning period would contribute to changes in land use patterns, such as increasing intensity of uses in places such as Urban Centers, which would add demands to the transportation network. Given the nature of the proposal, including a continued commitment to the Urban Village Strategy and growth assumptions for Urban Centers that resemble growth patterns from the past twenty years, such added demands would likely occur in a similar fashion as has happened in the last twenty years, with gradually increasing intensity of use across several areas of the city, although various areas might experience periods when growth occurs at a greater pace or a lesser pace.

Notably, four of the six Urban Centers are located adjacent to one another, clustering around Downtown, and informally known as “Center City.” Given the locational qualities these areas have, and their existing denser levels of urbanization, they are already conducive to a projected higher level of transit use per capita (and/or other transportation modes such as walking and bicycling) which would likely aid in moderating overall congestion levels to avoid worst-case conditions even though increased congestion in these areas is still likely over the long term.

It should be noted that because there is no identified difference between future growth under the proposal versus under a baseline “no action” scenario, no new or different potential for adverse transportation or parking impacts are identified for this element of the environment.

Analysis for future transportation conditions in 2035 also provides some perspective about probable future levels of service that will be afforded by the transportation network available at that time. This analysis has reviewed probable outcomes under alternatives that include a “no action alternative” that has the same growth assumptions for the Urban Centers as this current proposal under review.

The analysis also includes other assumptions about how other non-center growth may occur through 2035, which similarly assume outcomes in Urban Villages and other non-Village places that are comparable to the growth patterns experienced over the past twenty years. The Comprehensive Plan defines performance of the City’s transportation system using a set of “screenlines.”¹ Analysis of the recommended growth levels concludes that for all screenlines identified in the current Comprehensive Plan, the pattern of future growth would maintain levels

¹ A screenline is an imaginary line defined across several arterials for which total street capacity is evaluated to identify relative ability to accommodate traffic volumes, especially for peak-use periods.

of service within the defined standards for those screenlines. The standards are a “vehicle-to-capacity” (v/c) ratio of 1.0 or 1.20 that measures peak hour volumes as the numerator and total street capacity as the denominator. A v/c ratio of 1.20 as a level of service standard denotes places where the City tolerates a level of congestion during peak traffic periods that technically exceeds the rated capacity for a given street or highway or set of streets. Examples of places with the 1.20 v/c standard include the Ballard Bridge, Fremont Bridge, Aurora/SR 99 Bridge, and the screenline covering both the University and Montlake Bridges. Places where the draft findings predict exceedances of v/c ratios of 1.0 in 2035 include: the Ballard Bridge, the screenline for access to/from West Seattle including the West Seattle Bridge and Spokane Street Bridge, the screenline for the combined University Bridge and Montlake Bridge, South Lake Union, and the north city limit screenline measuring Aurora Avenue N and other arterials west of Aurora. These are for the peak direction of travel during the peak commuting hour. None of these 1.0+ v/c findings would cause exceedance of standards, however, because the relevant level of service standard for each is a v/c ratio of 1.20.

Public Services, Utilities

Future development within the planning period likely would contribute to population levels that would add demands and burdens to the provision of public services (such as police, fire, parks, schools) and utilities (such as water, sewer, electricity systems). Available analyses for selected capital facilities summarize conditions and relationships of City efforts to growth centers across the city. The City has the ability and capacity to continue to serve the future patterns of citywide population and land uses with public services and utilities. This would be supported by the continued provision and operation of current facilities/services, planned future improvements to facilities/services, and localized improvements that may be required to establish service to future developments.

However, it should also be noted that because there is no identified difference between future growth under the proposal versus under a baseline “no action” scenario, no new or different potential for adverse impacts are identified for this element of the environment.

NATURAL ENVIRONMENT

Earth, Water (Drainage & Water Quality), Plants & Animals, Construction Impacts

Future development within the planning period potentially could contribute to land use patterns that have the potential to adversely affect natural resources including sensitive geologic features such as steep slopes, landslide areas, seismically vulnerable areas, plant/animal habitat, and natural hydrologic features such as local streams and drainage courses. This could occur directly or indirectly depending upon how well future development sites follow the City’s current protective practices for minimizing disturbance of soils, critical areas, and localized drainage patterns that could contribute to downstream effects. Current City codes, policies and practices provide reasonable protections to reduce and/or minimize many impacts. Additionally, the recommendation includes new and revised policies that would extend protection to new land areas that would be classified as environmentally critical.

However, it should also be noted that because there is no identified difference between future growth under the proposal versus under a baseline “no action” scenario, no new or different potential for adverse impacts are identified for this element of the environment.

Air Quality, Energy, Environmental Health

Future development within the planning period potentially could contribute to incremental but likely slight adverse impacts upon local air quality, additional consumption of energy, and potential additional exposure to environmental health consequences to the extent that existing contaminated places might be reused without proper remediation, or proper practices are not followed with respect to preventing waterborne pollution from sources such as improperly treated surface runoff to streams and other waterbodies.

However, it should also be noted that because there is no identified difference between future growth under the proposal versus under a baseline “no action” scenario, no new or different potential for adverse impacts are identified for this element of the environment.

ITEM B – 23rd-Union/Jackson Land Use Designation Changes

NATURAL ENVIRONMENT AND BUILT ENVIRONMENT

23rd & Cherry

Future development of greater intensity than currently allowed in the area could only occur if a rezone were approved by the City Council following the FLUM change. The likely kinds of adverse natural environmental consequences from such development would be an increased likelihood, and slightly greater potential magnitude, of disturbance of soils in a greater area, possible changes in local stormwater surface drainage patterns, creation of dust, and generation of noise. All of these construction-related impacts could temporarily disturb nearby residents. After construction, the increase in potential for natural environmental impacts due to future use and development would be minor, due to the nature of the probable uses (residential occupation, employment/business), the features incorporated into code-compliant future development, and the infrastructure that would be available to serve future development would help reduce or avoid spillover effects upon the natural environment.

The 23rd and Cherry area is designated as a community-serving node that contains mixed-use developments, an abundance of community assets including parks/open space, Garfield High School and Community Center, teen center, arts program and small businesses that draw a broad mix of people. The current uses of the affected properties are either single-family residential or vacant yard/lot in nature. They abut or lie across the street from other single-family residential uses, with non-residential uses east along 23rd Avenue, including a gas station immediately adjacent to the property on the south side of E. Cherry Street. Due to their proximity or adjacency to arterials and adjoining non-residential uses, the character of the built environment context is less homogeneous than many other typical Seattle properties located within the Single Family designation. Therefore, other residential properties in the immediate vicinity are already

affected by nearby non-residential use and traffic patterns, with respect to daily activities and noise. It should be noted that the nearby single-family properties also sit topographically higher than the subject properties, affording an added degree of physical separation. In such an area, the potential for increased development nearby, which could include residential and non-residential uses, would add an increment of adverse impact potential due to increased proximity of denser development, but would not create whole new kinds of impacts upon its neighboring properties. Included would be slightly increased proximity to denser use patterns and higher-scaled buildings, the potential for added outdoor activities on the properties, the potential for increased traffic volumes generated by the affected properties, and the potential for added noise generation on the affected properties. The potential for future planning to propose land use controls that would more finely tune building bulk controls could be a factor that would aid in reducing impacts potentially generated by future building development on the affected properties.

If future uses happen to be institutional or community-supporting uses, the potential intensity of impact could be somewhat less than what would otherwise be possible within the zoning and code requirements, although this is not certain. This would depend on whether such uses would be additive, accessory or supportive to other uses such as churches, or whether they would be new multi-use buildings that might be able to include residential as well as other uses.

All of these factors support a conclusion that the potential range of land use-related built environmental impacts would not be significant and adverse in magnitude. Also, no indirect or cumulative impacts are identified.

23rd & Union

Adding a couple of limited-size block edges at E. Union Street to the urban village would not create substantial adverse impact implications, because the properties are already zoned and used predominantly for commercial purposes. The 23rd and Union area is a main neighborhood node with larger scaled mixed use development, and which serves as the community's largest center for goods and services. Future infill development at comparable levels could occur whether these areas are inside of the urban village or not, meaning there is little or no change in the potential for adverse natural or built environment impacts. Also, no indirect or cumulative impacts are identified.

ITEM C – Morgan Junction Land Use Designation Changes

NATURAL ENVIRONMENT AND BUILT ENVIRONMENT

West Seattle Church of the Nazarene - 42nd Ave SW and SW Juneau Street

If future development occurred in greater intensity following the proposed amendment to the Future Land Use Map (and a separately requested rezone that could follow adoption of the FLUM change), the likely kinds of short-term adverse natural environmental consequences would be an increased likelihood, and slightly greater potential magnitude, of disturbance of soils in a greater area, possible minor-to-minimal changes in local stormwater surface drainage

patterns, and short-term creation of dust and generation of noise. All of these construction-related impacts could temporarily disturb nearby residents.

After construction, the increase in potential for natural environmental impacts due to future use and development would be minor-to-minimal, because the nature of the probable uses (residential occupation, continuation of a religious institution), the features incorporated into code-compliant future development, and the existing or improved infrastructure that would be available to serve future development would help reduce or avoid spillover effects upon the natural environment.

The current use of the subject property is a church with an adjoining residence and vacant side yard, and nearby properties are either single-family residential (toward the north, east and south) or multifamily residential and commercial (toward the west) in nature. Due to its proximity or adjacency to small-scaled multifamily buildings and commercial uses across the alley to the west, this property's built environment context is transitional, in that it is near and exposed to heightened activity levels on streets, alleys and private properties, and therefore less homogeneous than other typical Seattle areas located within the Single Family designation.

In such an area, the potential for newly enabled low-density multifamily residential development on the subject property would add an increment of adverse impact potential due to increased proximity of slightly denser residential development, but would not otherwise create whole new kinds of impacts upon its neighboring properties. The already-proposed extent of potential future development would consist of approximately six townhouses, depending upon the outcome of a rezone proposal. These factors support a conclusion that the potential range of land use-development-related built environmental impacts that could arise as a result of the recommended designation change would not be significant and adverse in magnitude. Also, no indirect or cumulative impacts are identified.

ITEM D – Lake City Land Use Designation Changes

NATURAL ENVIRONMENT AND BUILT ENVIRONMENT

The proposal could accommodate future rezone to commercial or mixed use zones such as Neighborhood Commercial. If future development were to occur at a greater intensity, the likely kinds of adverse natural environmental consequences would be an increased likelihood, and slightly greater potential magnitude, of soils disturbance in a greater area, possible changes in local stormwater surface drainage patterns, creation of dust, and generation of noise. All of these construction-related impacts could temporarily disturb nearby residents.

The affected properties are relatively level in topography, with minor slopes down toward the south. After construction, the increase in potential for natural environmental impacts due to future land use and development would be relatively minor, due to the nature of the probable uses (residential, retail, office), the features incorporated into code-compliant future development, and the infrastructure that would be available to serve future development would help reduce or avoid spillover effects upon the natural environment. Factors that might increase

the potential for adverse impacts to the natural environment include: the largest property, which is potentially redevelopable and 2-3 acres in size, is located within a few hundred feet of a natural stream that is toward the southwest across city streets and within other properties. Depending upon the intensity and type of future potential development, different types of potential pollutants in stormwater runoff toward the natural drainage may be possible. For example, commercial businesses using or storing trucks in outdoor yards might generate different potential pollutant profiles than residential development. However, future development would be subject to the requirements of drainage and sewer codes that are stringent enough that they tend to result in better protections against runoff impacts than existing development. This would be expected to help avoid the potential for worst-case drainage and water quality impacts. Other properties also might or might not be redeveloped in the future, but they would also be subject to the same drainage and sewer requirements if new development occurs.

The potential for adverse impacts to the built environment is relatively minor as well. The subject area is already located within the Lake City Residential Urban Village; properties are zoned Lowrise 2, 3 and Midrise. Existing uses include a church, an office use residing in a former school building (in a Lowrise zone), three existing multifamily structures, and one other office building (in a Midrise zone). According to the City's quantitative factors for assessing redevelopment potential, none of these properties would likely meet criteria to be considered likely to redevelop under current zoning. That would mean there is no predicted likelihood for future redevelopment impacts.

However, based on a more liberal interpretation of building age and quality and property size, with a hypothetical future rezone there could be potential for long-term redevelopment of the large 2-3 acre property, potentially the 29,550 square foot church property, and perhaps one other office and one other multifamily property. Such redevelopment could thus contribute to greater future density and intensity of use of the subject properties, and generate a minor potential for adverse impacts to the built environment. This vicinity, though, is already characterized primarily by a mix of commercial uses, low-to-moderate density multifamily uses, and institutional uses such as parks and a library. The NE 125th Street arterial runs through the vicinity, and the Lake City urban village core is nearby to the east. This creates a built environment that is somewhat less sensitive to adverse impacts such as those related to increased building bulk and scale or potential non-residential uses. The presence of Virgil Flaim Park immediately to the south of the largest property also provides a buffer between potential future development and existing lower density development toward the south.

Increased traffic volumes and noise generation also could occur over the long-term, with potential for incremental additions of minor adverse effects on local streets to the north and south, and nearby existing residents in single family homes and multifamily homes (also in Lowrise zones). Traffic impact potential would be limited somewhat by the adjacency to NE 125th Street, which would be able to handle much of the inbound and outbound traffic additions if future denser development occurred.

In sum, the nature of the existing built environment, existing uses on the subject properties, and the relatively modest potential for future redevelopment would help to avoid the potential for

significant adverse impacts to the built environment that might arise if future development occurs. Also, no indirect or cumulative impacts are identified.

ITEM E – Environmentally Critical Area Policy Amendments

NATURAL ENVIRONMENT AND BUILT ENVIRONMENT

The recommended revisions would provide improved and clarified policy support for the City’s environmentally critical area protections, in some cases generalizing the language and in other cases better identifying purposes or the focus of the policies. The practical effect of the revisions would be to reinforce and better specify the meaning of the policy intents, which may aid in future evaluation of a wide variety of individual private or public actions. The expected range of physical outcomes in the natural environment, to the extent that they might be directly affected “in the field” would be a continued and probable improvement in the application of critical area regulations to places and situations where they might be affected by potential changes. For example, policy language will be available to help interpret a best course of action among possible choices by staff in how a geologically or hydrologically sensitive area may be protected. These probable contributions toward improved permitting/review outcomes would likely lead to long-term incremental positive impacts upon the environment.

The City already has regulations for peat-settlement prone areas, with no regulatory changes expected as a result of this proposed revision. Accordingly, no net changes in overall treatment or substantive adverse natural- or built-environment impact potential is identified for this item. Similarly, no adverse natural- or built-environment impact potential is identified for the recommended identification of seismic and volcanic hazard areas.

As a whole, the revisions are not likely to generate adverse impacts upon the built environment, including with respect to indirect or cumulative impacts. The environmentally critical areas policies and regulations would continue to be relevant to the same or nearly the same affected areas, which are broadly considered areas sensitive to future changes often in the form of development actions or other land alterations. By continuing and clarifying such protections, the likely outcomes would assist in maintaining public health and safety by avoiding potential degrading or damage to such resources, as well as supporting a trend toward improved overall protection of natural environments. No outcomes that would be construed as significant adverse impacts upon the built environment are identified.

ITEM F – Amendments to Environment Element Policies Addressing Stormwater Drainage Management and Permeable Surfaces

NATURAL ENVIRONMENT AND BUILT ENVIRONMENT

The proposed text revisions to Policy EP8.1 provide somewhat more specific references to possible components (trees, vegetation, amended soil, and other low impact development techniques) that could be used where feasible. This replaces and expands upon terms such as “natural drainage system approaches.” The other edits clarify and broaden the explanation of

purposes. Such clarifications may assist in interpreting or adjusting future direction of departmental efforts, and/or may merely provide clarity and support for future activities. Given that the intent and probable effect of the changes would be to support long-term improved conditions through future stormwater management and environmental restoration efforts, the EP8.1 amendment proposal is likely to avoid generating significant adverse natural environmental impact potential, including with respect to indirect or cumulative impacts.

The proposed text revisions to EP10 would remove a few clauses addressing policy purposes, including actions to increase vegetative cover for temperature, control stormwater flows and reduce pollution. The simplified proposed policy would add advice to remove unnecessary impervious surfaces. While less specific, the policy essentially retains the focus on promoting actions that reduce runoff and its damaging effects, and that support increased ability for rain water to infiltrate into places close to where they reach the surface. This sort of streamlining of details in language does not lead to any probable concern that significant adverse natural environmental impacts could result. The deleted objectives may still remain as City department planning objectives in any affected program regardless of their presence or absence in this particular policy, and in fact are represented within a range of other policy documents – such as those that address tree protections and climate management for example.

ITEM G – Housing and Childcare Mitigation Amendments

The Land Use Element, the Downtown Chapter of the Neighborhood Planning Element, and the Housing Element establish policies for a regulatory regime whereby impacts to housing and childcare associated with new development are partially mitigated. However, as matter of policy and regulation, mitigation is only required for development above a base density or height.

The causal connection between new office and hotel development and increased impacts on the demand for affordable housing was established by a nexus analysis in 2001. See *Jobs Housing Nexus Analysis Office and Hotel Buildings Downtown Seattle Linkage Program*, Keyser Marsten and Associates, March 2001. The causal connection between new office and hotel development and increased impacts on the demand for childcare was also established by a nexus analysis in 2001. See *Childcare Nexus Analysis Downtown Seattle Linkage Program*, Keyser Marsten and Associates, June 2001. The causal connection between new residential development and increased impacts on the demand for affordable housing was established in 2005. See *Residential Nexus Analysis*, Keyser Marsten and Associates, July 2005. The residential and commercial nexus analyses were updated in 2014. See *Administrative Review Draft - Seattle Affordable Housing Nexus Study*, David Paul Rosen and Associates, September 2014. The 2014 update considered commercial and residential development both inside and outside the Downtown Urban Center. An update to the childcare nexus is currently underway.

Because this is a non-project action, no short term adverse impacts are anticipated. The proposed amendments are a necessary but not-sufficient step towards future regulatory changes. Proposed amendments create the possibility for the City to establish a regulatory program whereby impacts to housing and childcare below a base height or density may be required to be at least partially mitigated.

NATURAL ENVIRONMENT

Earth, Air, Water, Plants and Animals, Energy, Natural Resources, Environmentally Sensitive Areas, Noise, Releases of Toxic or Hazardous Materials

The proposal would result in no direct impacts and is unlikely to result in significant indirect or cumulative adverse impacts related to earth, air, water, plants/animals, fisheries, energy, natural resources, sensitive areas, noise, or releases of toxic/hazardous substances.

At the non-project stage, it is not possible to meaningfully assess the potential impacts on the natural environment from these amendments. Development of future specific projects developed under yet-to-be adopted, potential regulations would be subject to the City's future and existing regulations, such as the Stormwater, Grading and Drainage Ordinance, the Environmentally Critical Areas Ordinance, and Noise Ordinance, and will be subject to environmental review, if they meet or exceed thresholds for environmental review.

The potential locations and sizes of current and anticipated development would not be significantly altered by the proposal, and the proposal does not alter any procedures or regulations related to natural environment protections. Therefore, the proposal is not expected to have a significant adverse impact on elements of the natural environment.

BUILT ENVIRONMENT

Land & Shoreline Use, Housing, Height/Bulk/Scale, Transportation, Public Services and Utilities

Without a specific regulatory proposal based on the proposed policy changes, it is not feasible to quantify the specific levels of impact in the Downtown Urban Center or on a citywide basis.

The changes are not expected to significantly alter the scale or quantity of new development that would otherwise be allowed in the absence of the proposal. Commercial and residential development in a variety of formats would continue to be allowed. Existing fees and performance requirements to mitigate impacts to affordable housing and childcare are not changed. And, the proposal does not change the overall planned and zoned development capacity of the city. Thus, the proposal would result in no direct impacts and is unlikely to result in significant indirect or cumulative adverse impacts related to land and shoreline use; housing; height, bulk and scale; transportation; public services; or utilities.

Future projects built under yet-to-be developed, potential regulations based on the proposal will require permits, review and project approvals as provided for in the Seattle Municipal Code and will be subject to environmental review, if they meet or exceed thresholds for environmental review.

If regulations are developed in the future that increase the level of affordable housing and childcare mitigation, those regulations would themselves be subject to environmental review and could result in positive cumulative impacts. Therefore, the proposal is not expected to have a significant adverse impact on elements of the built environment.

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: _____
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Department of Planning and Development