

Final Environmental Impact Statement

Mandatory Housing Affordability

Historic Resources Addendum

February 7, 2019

Fact Sheet

Project Title

City of Seattle Mandatory Housing Affordability (MHA)

Proposed Action

The proposal addressed in this Final Environmental Impact Statement (FEIS) is to implement MHA requirements for multifamily residential and commercial development in certain areas of Seattle. Implementing MHA is one of many actions the City proposes to address housing affordability. To put MHA in place, the City would grant additional development capacity through area-wide zoning changes and modifications to the Land Use Code. The proposed action includes several related components:

- Adopt requirements in the Land Use Code (SMC Chapter 23) for developers either to build affordable housing on-site or to make an in-lieu payment to support the development of rent- and income-restricted housing when constructing new development meeting certain thresholds.
- Modify development standards in the Land Use Code to provide additional development capacity, such as increases in maximum height and floor area ratio (FAR) limits.
- Make area-wide zoning map changes.
- Expand the boundaries of certain urban villages on the Comprehensive Plan's Future Land Use Map (FLUM) near high-frequency transit, as studied in the Seattle 2035 Comprehensive Plan.
- Modify certain rezone criteria in the Land Use Code and policies in the Neighborhood Plans section of the Comprehensive Plan, concerning single-family zoning in urban villages.

The FEIS analyzed environmental impacts of a "no action" alternative, two MHA implementation "action" alternatives included in the Draft EIS, and a Preferred Alternative. The action alternatives differ in the intensity and location of development capacity increases. The Preferred Alternative would implement MHA throughout the study area.

Location

The proposal would be implemented in specific zoning classifications in the study area, which comprises the City of Seattle with the exception of the Downtown, South Lake Union, and Uptown Urban Centers or the portion of University Community Urban Center addressed in the University District Urban Design Framework. Proposed areawide rezones are primarily concentrated in designated urban villages. Zoning classifications affected by the proposal would include existing multifamily and commercial zones in Seattle, areas currently zoned single-family in existing urban villages, and areas zoned single-family in potential urban village expansion areas identified in the Seattle 2035 Comprehensive Planning process.

Proponent

City of Seattle

Lead Agency

City of Seattle Office of Planning and Community Development (OPCD)

Required Approvals

After considering the EIS alternatives and this addendum and holding public hearings, the City Council will take action to implement MHA in the study area, which will include amendments to the official zoning map, and amendments to the text of the Land Use Code and limited changes to maps and policies of the 2035 Comprehensive Plan.

Date of Implementation

March or April 2019

Environmental Review

Consistent with the SEPA Rules, this EIS addendum adds information to the Draft Environmental Impact Statement (issued June 8, 2017) and Final Environmental Impact Statement (issued November 9, 2017). Several groups appealed the adequacy of the FEIS. The City of Seattle Hearing Examiner held a hearing during the summer of 2018 and on November 21, 2018, issued a decision affirming the adequacy of all aspects of the FEIS except the analysis of historic resources, which was remanded for additional mapping and analysis of specified types, and correction of minor typographical error.

The addendum to Section 3.5 Historic Resources of the FEIS addresses the Hearing Examiner remand. The addendum is complementary to the analysis and information in FEIS Section 3.5. Some content is beyond the minimum amount of information needed to address the Hearing Examiner decision, to provide complete and useful analysis to decisionmakers. The FEIS and addendum meet OPCD's SEPA responsibilities for the proposal and will accompany the proposal to the decision-maker. The City of Seattle hereby adopts the FEIS and addendum.

Authors and Principal Contributors to This EIS Addendum

- City of Seattle Office of Planning and Community Development (OPCD)
- Environmental Science Associates (ESA)

Date of Issuance of This EIS Addendum

February 7, 2019

EIS Addendum Comments Are Due

February 22, 2019

Written Comments Are to Be Submitted to

MHA.EIS@seattle.gov

or

Seattle Office of Planning and Community Development

Attn: MHA EIS

PO Box 94788

Seattle, WA 98124-7088

Documents available:

Copies of the FEIS addendum are available for public review at:

- City of Seattle OPCD (600 4th Ave, Floor 5);
- Seattle Public Library, Central Branch (1000 Fourth Ave.);
- Seattle Public Library, Northeast Branch (6801 35th Ave. N.E.)
- Seattle Public Library, Ballard Branch (5614 22nd Ave. N.W.)
- Seattle Public Library, High Point Branch (3411 S.W. Raymond St.)
- Seattle Public Library, Capitol Hill Branch (425 Harvard Ave. E.)
- Seattle Public Library, Columbia City Branch (4721 Rainier Ave. S.)

The FEIS and addendum may be viewed at OPCD's website, at

<http://tinyurl.com/HALA-MHA-EIS>.

Responsible SEPA Official

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Date: February 7, 2019

Signature: _____

A handwritten signature in black ink, appearing to read 'Sam Assefa', written over a horizontal line.

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Glossary of Terms

The following acronyms are frequently used throughout this addendum and are provided for reference.

DAHP	Washington State Department of Archaeology and Historic Preservation
DEIS	Draft Environmental Impact Statement
DON	City of Seattle Department of Neighborhoods
EIS	Environmental Impact Statement
FEIS	Final Environmental Impact Statement
(M) (M1) (M2)	Suffix to a zone designation indicating the level of required MHA contribution
MHA	Mandatory Housing Affordability
NRHP	National Register of Historic Places
NPS	National Parks Service
OPCD	City of Seattle Office of Planning and Community Development
SEPA	Washington State Environmental Policy Act
SHPO	Washington State Historic Preservation Office

Zone name abbreviations

SF 5000	Single-Family 5000 Zone
RSL	Residential Small Lot Zone
LR1	Lowrise 1 Multifamily Zone
LR2	Lowrise 2 Multifamily Zone
LR3	Lowrise 3 Multifamily Zone
MR	Midrise Multifamily Zone
NC-#	Neighborhood Commercial Zone with numeric height limit following the dash

Background

On November 9, 2017, the City of Seattle Office of Planning and Community Development (OPCD) issued a Final Environmental Impact Statement (FEIS) for the proposal to implement Mandatory Housing Affordability (MHA) in urban villages and commercial and multifamily zones throughout Seattle. Several groups appealed the adequacy of the FEIS. The City of Seattle Hearing Examiner held a hearing during the summer of 2018 and on November 21, 2018, issued a decision affirming the adequacy of all aspects of the FEIS except the analysis of historic resources, which was remanded for the following:

- (1) Include City designated Landmarks information in Exhibit 3.5-2 in the FEIS, and make associated text amendments to accommodate this inclusion;
- (2) Provide more detailed and clear analysis identifying the contents of the City database resource (e.g. all properties in the database not just the designated Landmarks) and how they have been utilized to inform the FEIS analysis; and
- (3) Ensure that the FEIS analysis adequately analyses all probable significant adverse impacts to City designated landmarks where Code protections are not assured, including but not limited to those associated with SEPA exempt projects and redevelopment that impacts the setting or character of a designated historic Landmark property.

In addition, the Examiner called for the City to correct a typo in Exhibit 3.5-4 and to ensure that all National Register of Historic Places (NRHP) properties are correctly depicted on FEIS Exhibit 3.5-2.

The information provided in this document addresses the remanded points and is issued as an addendum to Section 3.5 Historic Resources of the FEIS. This addendum is intended to provide thorough information to the reader in one document. It is complementary to the analysis and information in FEIS Section 3.5. Some content is beyond the minimum amount of information needed to address the Hearing Examiner decision, to provide complete and useful analysis to decisionmakers.

Affected Environment

There are overlapping sources of information from local, state and federal programs that track and define historic resources. Overlapping programs provide different regulations and protections for historic resources. The FEIS and addendum include information from several of these sources to characterize the affected environment and analyze potential impacts of proposed alternatives. Exhibit A.1 summarizes the primary sources of information that are considered, followed by a description for each.

Exhibit A.1 Summary of Historic Resources Information in FEIS and Addendum

Source of information / program	Description / features
City of Seattle Historic Districts	<ul style="list-style-type: none"> • Designated and regulated by City of Seattle • The City's eight Historic Districts are outside of the FEIS study area. Impacts or effects on these districts from the proposal are indirect. • Development in a district is subject to review by a Historic Preservation Program Board or Commission • Districts overlap with some National Register of Historic Places Districts
City of Seattle Landmarks	<ul style="list-style-type: none"> • Designated and regulated by City of Seattle • Landmarks are designated by a Landmarks Preservation Board • A Controls and Incentives Agreement defines the features of the Landmark to be preserved • Changes to designated historic features must be approved through a Certificate of Approvals process
National Register of Historic Places Determined Eligible Resources	<ul style="list-style-type: none"> • Listing occurs through nomination to the State Historic Preservation Office (SHPO) • When SHPO determines criteria are met it considers a resource "Determined Eligible" • Resources are eligible for various preservation incentives • Some but not all resources are also City of Seattle Landmarks • No local regulatory protection unless the project is subject to a Federal undertaking or has State funding
City of Seattle Historic Resources Sites Survey Database	<ul style="list-style-type: none"> • A database of potentially historic resources that have been surveyed or inventoried • Does not determine if a site or resource should be designated as a Landmark • Information is not systematically collected or updated
National Register Historic Districts	<ul style="list-style-type: none"> • Listing occurs through nomination to the SHPO • SHPO forwards nominations to the National Park Service • No local regulatory protection unless the project is subject to a Federal undertaking or has State funding • Development in the district is not subject to a historic review process unless the site is a Landmark or adjacent to a Landmark or subject to SEPA project level review • Some NRHP districts overlap or are coincident with City of Seattle Historic Districts, while others are distinct from City of Seattle Historic Districts.

The sources of information and programs have different purposes and afford different levels of resource protection. City of Seattle Landmarks for example are formally designated by a Landmarks Preservation Board, and any changes to historic features that are designated must be reviewed and approved as part of local land use permitting. Similarly, development within City of Seattle Historic Districts is subject to local level regulations. By contrast, listing in the NRHP, or as a National Register Historic District, does not on its own carry local designation as a historic resource and does not afford local-level regulatory protections. Listing raises general awareness of historic resources merit and triggers eligibility for incentives.

Some but not all local historic resource designations (Landmarks and Historic Districts) overlap with national register listings and districts.

The sources of information also represent different levels of formality to resource identification. Information from the City of Seattle's Historic Resources Sites Survey Database offers preliminary or early recognition of potential historic resources, in contrast to the formality and certainty associated with the City's designated Landmarks and Districts. Similarly, NRHP Determined Eligible information is an indicator of resources with a likelihood of having historic resources value worthy of preservation, but these may not have undergone a process to complete formal listing on the National Register, and furthermore may not yet be determined at the local level to merit protection. Therefore, although some of the sources contain information suggesting likelihood as a historic resource, it cannot be known with certainty that a resource is definitively present and would be impacted.

The overlapping nature of the historic resources information, and the degrees of formality to resource identification complicates the landscape for environmental analysis. There is not a singular barometer for what constitutes a historic resource that may be impacted by the proposal. Layers of information are presented for decisionmakers to contemplate.

City of Seattle Historic Districts

The FEIS notes the eight City of Seattle managed historic districts, which are exempted from MHA implementation under all alternatives and are not in the study area. Three City of Seattle Historic Districts have the same boundaries as National Register Historic Districts (Ballard Avenue Landmark District, Sand Point Naval Air Station Landmark District, and the Harvard-Belmont Landmark District).

The appearance and historical integrity of structures and public spaces within each City of Seattle Historic District are regulated by a citizens' board and/or the Landmarks Preservation Board in accordance with processes and criteria established by City ordinance. Any alteration to the exterior of a resource in a City of Seattle Historic District and in some cases the interior of the resource must be reviewed by a preservation board through a process that is administered by the Department of Neighborhoods (DON) Historic Preservation Program.

Designated City of Seattle Landmarks

Since 1973, Seattle has designated more than 400 individual sites, buildings, vehicles, vessels, and street clocks as City of Seattle Landmarks subject to protection by the Seattle Landmarks Preservation Ordinance (SMC 25.12.350). The Landmarks Preservation Board reviews nominations and decides whether to grant designation of landmark status. To be designated the building, object, or site must be at least 25 years old and must meet at least one of the six criteria for designation outlined in the Ordinance (SMC 25.12.350). If the Board designates a resource, a Controls and Incentives Agreement for the landmark may be negotiated by the Board staff with the property owner and approved by the Landmarks Preservation Board. Controls define those features of the landmark to be preserved and outline the Certificate of Approval process that is required for any future changes to those features. The City of Seattle Landmarks designation process is separate from listing in the NRHP.

The setting of a building or site can contribute to its designation as a Landmark. City staff and Landmarks Preservation Boards consider the Secretary of the Interior's Standards for Rehabilitation when reviewing Certificates of Approval for

changes to a Landmark. The Secretary of the Interior's Standards "encompass related landscape features and the building's site and environment as well as attached, adjacent, or related new construction." In some circumstances unique elements of the related landscape features near, but not on the same property as the Landmark, contribute to the historic character of the Landmark. Examples include adjacent property configurations that provide vistas to a Landmark or frame the Landmark in some way. A compatible scale or massing of buildings and structures next to a Landmark may in some instances contribute to the Landmark's significance. The setting of a Landmark is not always important to the Landmark's significance, and in many instances features of adjacent properties are not related to the Landmark. Examples include Landmarks that are significant for their association with events or people. Usually, the significance of a Landmark is not due solely to the setting; other criteria may contribute more to the historic significance.

NRHP Determined Eligible Resources

As noted in the FEIS at page 3.297, the study area contains historic resources that are listed in and that have been Determined Eligible for listing in the NRHP. The NRHP is the official list of the Nation's historic places, authorized by the National Historic Preservation Act of 1966. The process for listing a resource on the NRHP occurs through submittal of a nomination form to the State Historic Preservation Office (SHPO). To be considered eligible, a property must meet at least one of the National Register Criteria for Evaluation. This involves SHPO's evaluation of the property's age, significance, and integrity. When SHPO determines the criteria are met, the property is considered "eligible for listing." The State Advisory Council is a part of the decision-making process. It is a Council appointed by the Governor to review nominations and make recommendations to the National Park Service (NPS). SHPO forwards complete nominations to the NPS for final review, approval, and listing in the register.

Unlike City of Seattle Landmarks, there is no regulatory protection afforded to resources listed in or eligible for listing in the NRHP unless the project is subject to a Federal undertaking or has State funding. If a project has Washington State funding or is subject to a Federal undertaking the project would need to consider the potential effects on historic resources. Mitigation may be required for impacts to NRHP Determined Eligible resources subject to Washington State Executive Order 05-05 or Section 106 of the National Historic Preservation Act. NRHP register resources are eligible for various incentives for preservation such as State and Local tax benefits, State and Federal Grants, and investment tax credits.

City of Seattle Historic Sites Survey Database

The City of Seattle's Department of Neighborhoods (DON) possesses a database of information about potential historic resources that have been surveyed or inventoried (see also discussion at FEIS page 3.297). The City has conducted survey and inventory projects several times throughout the almost 50-year history of the City's Historic Preservation Program. A citywide survey was conducted in the late 1970s and updated periodically into the early 1980s. In 2000, the City began a systematic and comprehensive effort to survey and inventory historic resources in the city. That effort began with a survey of all City-owned properties. Subsequent work included additional thematic surveys, such as residential properties built prior to 1906 and all Neighborhood Commercial (NC) zoned properties, as well as neighborhood-based survey efforts. Most of the neighborhood-based survey projects also received funding from sources other than those budgeted to Department of Neighborhoods for survey work, such as mitigation funds from large public projects, Neighborhood Matching Fund grants or Washington State Department of Archaeology and Historic Preservation (DAHP) Certified Local Government (CLG) grants. In 2011, budget for continued systematic citywide survey work by the Historic Preservation Program was discontinued, thus, not all neighborhoods in the City were surveyed.

All surveys have been conducted or overseen by a qualified historic preservation professional; in some instances, volunteers and/or students have participated with survey and inventory field work and data collection. Surveyors review the characteristics of buildings or sites in the field, research related historical information, and record observations and findings on a form. Information from forms is entered into the electronic database over time. In total, surveyors inventoried more than 5,000 properties that are included in the database and are now available to the public on the City of Seattle's website. In conjunction with survey inventories, historic context statements have been prepared for some neighborhoods. Historic context statements describe historic and cultural significance of a larger area or neighborhood. Exhibit A.2 indicates study area urban villages where a systematic historic inventory has been conducted and where a historic context statement has been prepared.

Exhibit A.2 Historic Resources Survey Status*

Urban Village	Properties Listed in City Historic Resources Survey Database	Systematic Inventory Conducted	Historic Context Statement Prepared
23rd & Union-Jackson	X	X (as part of Central Area Survey)	X
Admiral	X		
Aurora-Licton Springs	X		
Ballard	X		
Bitter Lake	X		
Columbia City	X	X	X
Crown Hill	X		
Eastlake	X		
First Hill-Capitol Hill	X		
Fremont	X	X	X
Green Lake	X		
Greenwood-Phinney Ridge	X		
Lake City			
Madison-Miller	X	X (as part of Central Area Survey)	
Morgan Junction	X		
North Beacon Hill	X	X	X
North Rainier	X	X	X
Northgate	X		
Othello	X		
Rainier Beach	X		
Ravenna	X		
Roosevelt	X		
South Park	X	X	X
University Community	X	X	
Upper Queen Anne	X	X	X
Wallingford	X	X	X
West Seattle Junction	X	X	X
Westwood-Highland Park	X		

* Exhibit A.2 is an updated version of FEIS Exhibit 3.5-4, amended to reflect the inclusion of North Beacon Hill as a neighborhood where a Historic Context Statement has been prepared.

Limitations of the City of Seattle Historic Sites Survey Database

Limitations to the database must be considered when using this data as a source of information for environmental analysis. Survey and inventory efforts ideally are done on a continuous cycle, given that data should be updated every five to ten years to keep the data relevant and useful. Historic resources survey and inventory data is not static, and alterations, demolitions or other changes to sites and buildings that have occurred since the time of the survey are not reflected in the database. Inventoried resources that did not meet age thresholds when inventoried do not appear in the database. Entries into the database span the timeframe from 1991 to 2018.

As indicated at Exhibit A.2 only some geographic areas have been systematically inventoried. Unevenness of the geographic coverage means that the data aren't useful for a comparison of the quantity or concentration of potential historic resources from one area to another. Comparison of the concentration of surveyed sites between neighborhoods can be misleading because the relative number of survey/inventory sites in neighborhoods is more reflective of where surveys have been conducted and is not necessarily indicative of a greater or lesser concentration of historic resources.

Individual records in the database are completed to different levels of detail. Some entries where a complete inventory has been conducted are thoroughly researched, while others have only cursory notes. The varying level of information is due to limited time and resources. If the full time or budget to complete an inventory of a site is not available, surveyors sometimes still enter piecemeal information that they are able to obtain expediently.

City of Seattle Historic Sites Survey Database Use and Purpose

The purpose of the database is a repository of information that can be consulted as a starting point for planning purposes and for environmental review. The data is an appreciated resource utilized by residents, historical societies, and other people or groups interested in the history of the City. The database is used as a source of information to assist the City when conducting environmental review, and to advise property owners or community members on the potential eligibility of an individual resource for landmark designation or for potential historic district eligibility.

A resource's characterization in the database is not determinative of whether a resource is eligible for City of Seattle Landmark status. The sole process for determination of whether a resource should be designated is made by the Landmarks Preservation Board as part of the Landmarks nomination process. A resource's presence in the database is not by itself an indication of whether the resource has historical significance. The database is used in conjunction with a variety of other information in the process to determine whether a resource meets the criteria required for Landmarks designation.

Display of the City of Seattle Historic Sites Survey Database

Notwithstanding limitations, this addendum uses the survey inventory information for an augmented portrayal of the affected environment and consideration of the proposal's potential impact. The database was downloaded on December 10, 2018. There are several categories of information in the database as discussed below. Any of the sites in the database could potentially have been substantially altered or even demolished since data was entered.

Sites likely ineligible for Historic Landmark Status due to alteration. These are records of resources where a surveyor observed alterations of a structure that caused alteration to a degree that would likely render the resource ineligible for

designation as a City of Seattle Landmark under the architectural criteria. For this category, database records may contain a description of the property's features, and/or photos highlighting the altered or damaged characteristics.

Sites likely ineligible for Historic Landmark Status due to age at the time of survey. These are records of resources for which a surveyor reviewed the property to an unspecified level of detail and noted that due to the resource's age that the resource was not eligible. A structure must be at least 25 years old to be considered for City of Seattle Landmark designation. The database does not contain a consistent level of information on records in this category about the resource's historic characteristics.

Sites identified to "Hold" for future historic inventory. These are records for which an incomplete review of a resource has been conducted. Often surveyors have limited time or budget to complete fieldwork of all properties in an area. In these cases, the surveyor can make an incomplete observation of a resource, noting surface-level characteristics, that indicate potential for historic significance which might warrant completion of a full inventory. These records often contain a description of some of the property's features, and/or photos highlighting features that would indicate merit for further documentation with a complete inventory.

Sites with a historic inventory conducted. These are records for which a complete historic inventory has been conducted. A complete inventory typically includes a thorough observation and recording of the resource's characteristics, style, and history. A complete inventory should include information about a resource's exterior. A complete inventory also includes information about the site's history such as the architect or designer, owner, or relationship to communities or events of historic significance. These records typically contain several paragraphs of narrative information about the resource, and photographs.

For the purpose of this additional analysis two of the database categories are portrayed geographically on maps: "Sites identified to hold for future historic inventory" and "Sites with a historic inventory conducted". These categories are the focus, because they reflect resources that may have greater potential to be historically significant but are not yet protected as designated City of Seattle Landmarks. Properties in the "hold" category are somewhat more likely than other sites to have historical significance which could meet landmark criteria at some time in the future. Resources in the "historic inventory conducted" category can safely be assumed to be more likely than other resources to have historical significance that could meet the criteria for designation as a City of Seattle Landmark. Data in the two database categories are mapped for each MHA EIS alternative in the maps in the appendix, along with designated City of Seattle Landmarks, and NRHP Determined Eligible resources.

Mapping Approach

City of Seattle Landmarks, NRHP Determined Eligible resources, and locations in the City of Seattle Historic Sites Survey Database are mapped for each MHA EIS alternative at maps in the appendix to this addendum. The NRHP properties on these maps are also mapped at FEIS Exhibits 3.5-2 and Exhibit 3.5-3.

Together these datasets present a thorough picture of known and potential historic resources in the study area to date. The City of Seattle determined that mapping these three datasets together at a larger map scale than Exhibits 3.5-2 and 3.5-3 is the most effective and informative way to address a portion of the directive from the Hearing Examiner decision concerning mapping of City of Seattle Landmarks, and for minor correction to the mapping of NRHP Determined Eligible resources.

With all three datasets shown on the maps, it should be noted that, because the programs rely on individual nominations, and due to the allocation of resources for surveys and inventories, the locations of the resources or potential resources often reflect the efforts of individuals and organizations active in specific locations and neighborhoods. Therefore, a relative absence of mapped resources in a particular neighborhood should not be viewed as a confirmation of the lack of historic resources. Mapping is likely to overstate what appear to be differences between neighborhoods in their relative concentration of historic resources. As a result, decisions about the geography of MHA program application based on mapping should be made with caution.

National Register Historic Districts

Since the FEIS was published, two new National Register Historic Districts were designated and recognized by the Washington State Historic Preservation Office (SHPO), the Ravenna-Cowen North Historic District and the Mount Baker Park Historic District. Portions of both newly designated historic districts overlap with the study area. Limited areas in the Montlake Historic Districts are also in the study area. Several other National Register Historic Districts are present within Seattle but are not located within the FEIS study area. This addendum adds information to reflect the two new districts and provides further discussion of the existing Montlake Historic District. This additional analysis is not a direct result of the directive of the Hearing Examiner but is added to provide additional information.

FEIS page 3.297 discusses National Register Historic Districts within study area urban villages or expansion areas. Development in a National Register Historic District that is not a City of Seattle Historic District is not subject to a historic review process unless the site is a City Landmark or adjacent to a City Landmark. If SEPA review is required the potential impacts to a National Register Historic District could be considered, but no codified regulatory protection would be in place. If the project is subject to a Federal undertaking, potential impacts to the National Register Historic District would be considered under Section 106 of the National Historic Preservation Act.

Impacts

The discussion of impacts in this addendum focuses on information that is additional to the analysis in FEIS Section 3.5. FEIS Section 3.5 concluded that the MHA program could result in indirect significant impacts to historic resources. It stated that project level review is a basis for mitigating impacts to a non-significant level, and implementation of a combination of mitigation measures would be required to fully avoid significant impacts to historic resources.

Section 3.5 concluded that under MHA action alternatives urban villages that have significantly higher growth rates would have higher potential for significant impacts to historic resources. The threshold of a 50 percent or greater growth rate compared to No Action was established as an indicator that the urban villages would have greater likelihood of impact to historic resources. The EIS identified the urban villages under each alternative with high growth rates and discussed the context of historic resources and whether inventories have been conducted there. Urban villages with growth rates less than 50 percent would still be expected to have some impact to historic-ages properties.

The distribution of growth in urban villages varies across the action alternatives, however in the aggregate the estimated amount of total demolitions, including those that could affect historic resources, is roughly comparable in all the Alternatives. Although it is extremely difficult to predict a site-based redevelopment pattern given the uncertainties of markets and property owner decision over a long time period, analysis within Section 3.1 Housing and Socioeconomics of the FEIS includes an estimation of the number of demolished housing units under each alternative. As seen at Exhibit 3.1-41 the total number of demolished units under the No Action Alternative is 2,898, and this amount increases by no more than 132 units, or 4.5 percent in the high-end estimate, under any Action Alternative. Under the low-end scenario the amount of demolition is less in the action alternatives than under No Action. This estimation of demolitions is relevant to discussion of Historic Resources because an MHA zone change on or near an existing or potential historic resource would not by itself lead to a higher likelihood of redevelopment compared to the No Action Alternative, with any degree of certainty. The total amount of redevelopment sites that could affect individual properties is similar in the action alternatives and is not likely to be significantly greater than in no action (and may even be less).

While the total amount of redevelopment sites is similar in the action alternatives, the scale and intensity of development that occurs on redevelopment sites will be different. The FEIS concludes that MHA zone changes in the (M1) and (M2) tiers would result in greater likelihood of impact to historic resources due to scale changes compared to (M) tier zoning changes. The FEIS states indirect impacts could occur from larger scale development adjacent to a historic district, and it states that larger scale redevelopment could impact the character of a historic property or Landmark if the development occurs adjacent to it. The distribution and pattern of larger scale MHA zone changes varies between Alternatives, and FEIS Section 3.5 concludes that historic resources of all types could be impacted due to changes in the scale of development that will occur in an urban village under the different action alternatives.

The FEIS also concludes that redevelopment could result in significant adverse impact for properties that have the potential to be landmarks if the regulatory process governing the development does not require consideration of that property's potential eligibility as a Seattle Landmark. The FEIS highlighted projects exempt from SEPA review as a scenario where potential eligibility would not be considered. Even though the larger scale (M1) and (M2) zoning changes are more likely to result in impacts to historic resources due to scale changes, those same larger scale developments would also be more likely to trigger SEPA or DON historic reviews.

This addendum provides more detailed information about the nature of the potential impacts. It provides more granular mapping for clear identification of the locations where the described impacts could potentially occur. It provides more detailed analysis of the scenarios in which SEPA-exempt development would be likely.

Impacts Common to All Alternatives

Under all alternatives, redevelopment, demolition, alteration and new construction projects could occur and these projects could impact historic resources. Even without MHA, under existing zoning, existing market forces and pressure for redevelopment on properties in the study area suggest that the pressure on historic resources is likely to continue and increase over time.

Zoning changes to implement MHA under the action alternatives would allow for incrementally greater floor area, building height, and/or different allowed land uses in future developments on locations with Landmarks and NRHP Determined Eligible resources, as well as sites that are adjacent to or nearby Landmarks or NRHP Determined Eligible resources. There is potential for relatively greater indirect impact to Landmarks and NRHP Determined Eligible resources in cases where greater zone changes are proposed. The intensity of MHA zone change varies across the alternatives, and the degree of change can be summarized by the (M), (M1), and (M2) MHA zone tier (see discussion at FEIS Section 3.22 for overview of the scale of MHA capacity increases by MHA tier). Zone changes on properties with Landmarks or NRHP Determined Eligible resources are identified in each Action Alternative on maps in the appendix to this addendum. (M1) and (M2) tier capacity increases have potential for relatively more indirect impact to historic resources as a result of the potentially increased scale of future development. The analysis quantifies the number of Landmarks and NRHP Determined Eligible resources with larger (M1) and (M2) tier capacity increases. While the potential for impact is greater on sites of (M1) and (M2) tier capacity increases, the scale of that development would also be more likely to trigger SEPA review.

Impacts to City of Seattle Landmarks

Protection for resources already designated as City of Seattle Landmarks would continue to be in place under all alternatives. Development on City of Seattle Landmark sites must preserve features of historical significance as outlined in the Designation Report, Controls and Incentives Agreement and/or Designation Ordinance. Construction may still occur at a location with a Landmark causing some impact to the historic resource if the Certificate of Approval is not able to fully mitigate the impact. However, since Landmarks designation is the City's primary policy for protection of historic resources, impact from redevelopment that takes place per a Certificate of Approval is not considered to be significant.

Development that could take place adjacent to or across the street from a Landmark resource could lead to impacts under all Alternatives. As stated in the FEIS, (see page 3.305) for projects subject to SEPA, demolition or substantial modification to buildings over 50 years of age that are adjacent to or across the street from a designated City of Seattle Landmark are subject to Department of Neighborhoods review. The project level review process would mitigate the effects of development at locations that affect the setting of a Landmark, by encouraging design of the new development in a way that minimizes negative impacts to the integrity or vistas of the nearby City of Seattle Landmark. Still the redevelopment may cause impacts to the City of Seattle Landmark if the scale relationships, incongruity of design, or obscuring of the visual prominence of the City of Seattle Landmark can't be entirely mitigated by the processes outlined in the SEPA Policies.

Development of the larger scale or more intense variety would be more likely to undergo SEPA review. A section of the addendum below addresses specific SEPA exempt development scenarios.

Redevelopment near a Landmark is less likely to have adverse effects than redevelopment on the site of the Landmark itself. If no historic review is in place for redevelopment near a Landmark, there is potential for adverse impact in a narrow range of circumstances that are not typical. A Landmark's setting as it extends onto adjacent properties is only a factor for the Landmark's significance in some cases where adjacent features are "related" to the Landmark. Redevelopment adjacent to a Landmark would not necessarily cause impact to a Landmark's integrity. Most Landmarks in the study area are buildings within a context of other adjacent structures or lots that may have no meaningful relationship to the Landmark. Adjacent redevelopment would not alter aspects such as the distinctive architectural features, finishes, or colors of the Landmark. Secretary of the Interior Standards recognize new development that is differentiated from the old as an acceptable design approach. For a significant adverse impact to be present, adjacent redevelopment would need to be of a scale, size or massing that causes substantial harm to the integrity of Landmark's environment, such as detracting from the Landmark's prominence as a spatial location or reducing the degree to which it is an easily identifiable feature of the neighborhood. Given the factors limiting prevalence of the scenario, including the likelihood of development at that scale having project level review, and the uncertain nature of future development and the degree to which design would be sympathetic to the landmark, potential adverse impacts from redevelopment near a Landmark under the alternatives is not considered to be significant at the programmatic level of the FEIS.

While the circumstances under which redevelopment adjacent to a Landmark is exempt from historic review and would also cause major massing and scale conflicts are limited, this addendum provides granular information on the specific locations where those impacts could occur under each alternative. MHA zoning changes would allow for a greater scale of redevelopment on some sites near landmarks compared to No Action, particularly where larger scale (M1) and (M2) zoning changes are proposed. Redevelopment under zones with large scale (M1) and (M2) zoning changes is also more likely to trigger historic review processes. Maps in the appendix to this addendum; Exhibits A.5, A.6, and A.7; and associated text provide the relevant information.

Impacts to NRHP Determined Eligible Resources

NRHP Determined Eligible resources are known resources determined to have historic or cultural significance that is worthy of preservation protections and/or incentives. Under all alternatives NRHP Determined Eligible resources that are not City of Seattle Landmarks are at risk of impact due to redevelopment or renovation, particularly when a project is not subject to SEPA or DON review. A section of the addendum below addresses specific SEPA exempt development scenarios. The FEIS indicates that these impacts are potentially significant. NRHP Determined Eligible resources that are not Landmarks are eligible for State and Local preservation incentives but do not have regulatory protection of historic features in place at the time of project level review, absent federal nexus or state funding.

Similar to Landmarks, development on or near an NRHP Determined Eligible resource that is a different scale or architectural style than the resource could cause adverse impacts by altering the context or obscuring the resource's visibility or prominence. If SEPA review is in place, there would be some consideration of the adjacent NRHP Determined Eligible resource pursuant to the historic resources section of the SEPA checklist. However, it is not common to impose substantial mitigation on a development that is adjacent to an NRHP Determined Eligible resource if it is not also a

Landmark. Indirect impacts from development near NRHP sites are expected under all alternatives. Several religious facilities are NRHP Determined Eligible Resources. Due to State case law, religious facilities are not subject to being Landmarked without their agreement. Therefore, NRHP designation provides less protection for religious facilities than for other resources, because the religious institution could choose to redevelop a Determined Eligible Resource prior to Landmark designation.

Maps and tables in this addendum provide information on the specific locations where impacts to NRHP Determined Eligible Resources due to incrementally greater scale of development could occur under each alternative.

SEPA-Exempt Development

Redevelopment that is exempt from SEPA review and is adjacent to or across the street from designated Landmarks could cause an impact to the setting of a Landmark that could impact its integrity. Likewise, SEPA exempt redevelopment on or near an NRHP Determined Eligible resource could cause impact to the historic resource. Under all alternatives, including the No Action Alternative, some SEPA exempt redevelopment or alteration of properties adjacent to or across the street from Landmarks and on or near NRHP Determined Eligible resources is expected.

It is impossible to predict the site sizes, or future development configurations that will take place, and these could vary widely. For some properties, changes to zoning under an Action Alternative could increase the likelihood of small-scale development that remains under the SEPA review threshold compared to No Action. In other instances, MHA zone changes may lead to larger-scale development on sites that would exceed a SEPA review threshold under an Action Alternative, compared to development that would not exceed SEPA review thresholds under existing zoning.

A review of the thresholds for SEPA exempt development is included below at Exhibit A.3 to provide information about the zones where SEPA exempt development is relatively more likely under the action alternatives. Development standards from the action alternatives are used (see Appendix F) and locations of zones can be seen at maps in Appendix H. Thresholds for SEPA exemption are codified at SMC 25.05.800 and are based on the number of residential units or amount of commercial gross square feet in proposed development. Exemption thresholds are higher for designated urban centers and thresholds further vary depending on whether the urban center has exceeded a Comprehensive Plan growth estimate. Northgate, University Community, and Capitol Hill-First Hill are the only urban centers in the study area, and all other locations would fall under the SEPA threshold category Outside of Urban Centers. None of the Urban Centers in the study area have exceeded Comprehensive Plan growth estimates to date.

Exhibits A.3 and A.4 summarize zones in which new development is relatively more likely (compared to development in other zones) to fall below SEPA thresholds given the FAR limits proposed in the Action Alternatives and assumptions about average unit sizes. The number of residential units or square footage of commercial development was estimated for a typical development scenario in each zone for four lot size scenarios: 5,000, 10,000, 20,000, and 40,000 square feet, then compared to the SEPA threshold for the zones.

Exhibit A.3 Likely SEPA-Exempt Development Scenarios in Residential, Mixed Use or Commercial Development

Outside urban centers	Within urban centers where growth estimates have not been exceeded
<ul style="list-style-type: none"> • Residential Small Lot (RSL) zones on lots less than 10,000 square feet • SM-RB 55 zones on lots less than 20,000 square feet • SM-RB 85 and SM-RB125 zones on lots less than 10,000 square feet 	<ul style="list-style-type: none"> • RSL on lots less than 10,000 square feet • Lowrise and Midrise zones • Highrise zones on lots less than 20,000 square feet • Commercial and Neighborhood Commercial zones with heights of 65 feet or less • Commercial and Neighborhood zones with heights greater than 65 feet on lots less than 40,000 square feet • SM-D and SM-NR zones on lots less than 40,000 square feet • SM-RB zones

Exhibit A.4 Likely SEPA-Exempt Development Scenarios Single-Purpose Commercial Development

Outside urban centers	Within urban centers
SM-RB 55 zones on lots less than 10,000 square feet	None

As noted above, the thresholds for exemption from SEPA distinguish between those sites that are inside and outside Urban Centers. In most of the study area that is not in an urban center, a potential SEPA-exempt scenario that is more likely to lead to redevelopment that is SEPA-exempt is the rezone to the RSL on lots less than 10,000 square feet (which would be below the threshold because there would be less than four housing units). Historic resources in all urban villages or urban village expansion areas with proposed RSL zoning could be subject to indirect impact. However, because most areas proposed to be rezoned to RSL are currently zoned single-family - which allows new construction of single-family homes that may replace an existing home - alteration or demolition of property under existing zoning in the No Action Alternative is also possible. Development standards of the RSL zone are intended to be compatible with an existing single-family context and project design may or may not be sympathetic to historic fabric in the area. Some indirect impacts to historic resources from this scenario are expected under all Action Alternatives where RSL zoning is proposed. The other zones outside of urban centers where SEPA-exempt development is likely are the Seattle Mixed Rainier Beach zones. Impacts from SEPA exempt development could occur in the Rainier Beach zones. Although no known historic resources are located in the Rainier Beach zones, a historic inventory has not yet been conducted.

Within urban centers, a much broader range of zones would create potential development that would be exempt from SEPA. SEPA exempt development is expected under all alternatives in the First Hill-Capitol Hill, Northgate, and portions of the University District urban center that is in the study area. Of the urban centers, First Hill-Capitol Hill contains a high density of historic resources that could be impacted indirectly by SEPA exempt development. The First Hill-Capitol Hill Urban Center has additional regulatory protections and incentives for historic resources in place. In Capitol Hill, there is an existing Pike/Pine Conservation Overlay District, and in First Hill incentive zoning includes Transfer of Development Potential (TDP) program to incentivize preservation of landmarks. Both programs have already resulted in preservation of Landmarks or

historic features of character structures and it is expected this would continue with the redevelopment that occurs under action alternatives. The Pike/Pine Conservation Overlay District is an integrated feature of the proposal, and retention of the zoning incentives for TDP in First Hill is a recommended mitigation measure.

Impacts Relative to Historic Resources Survey Database Sites

When information from a historic survey or inventory is available there is more documentation available to inform property owners, the public, DON historic resources staff, and Landmarks Preservation Board members about the potential for historic resources. Therefore, urban villages or neighborhoods with higher concentrations of inventoried resources have nominally greater historic resources protection due to the relatively higher awareness of historic information in the neighborhood. With more historic resources information reviewers have better understanding of context, so they can consider the uniqueness or local significance of a potential resource. Conversely, neighborhoods or locations with less inventory work conducted may be slightly more susceptible to loss of historic resources that are potential Landmarks because less documentation of historic resources is available. Exhibit A.2 above lists the urban village areas where historic context statements and inventories have been prepared.

Locations with high concentrations of "hold" or "inventoried" resources may have a higher potential for historic resources that could meet the criteria for designation as a Landmark in the future and are not yet designated, and the concentration could indicate greater potential for a historic district. Potential for impact to these resources due to development is more likely in scenarios where development would be below the SEPA threshold. Impacts to potential future landmarks are possible under all alternatives, including the No Action alternative.

The presence of a record in the City database as "inventoried" or "hold" on its own is not a reliable indicator that a potential Landmark is present. Preparation of historic resources surveys is largely dependent on organizations and individuals that are focused on specific neighborhoods, and therefore comparing the concentration of database sites between neighborhoods can be misleading as to the relative absence of resources across neighborhoods. Given the factors described above and data limitations, the presence of an inventoried or hold site in the database within an MHA implementation area is not considered to constitute an adverse impact. Nonetheless, for background information purposes, the maps in the appendix to this addendum show the location of the City's historic inventory database sites.

Impacts to National Register Historic Districts

At the time the FEIS was published, none of the alternatives proposed MHA zoning changes within the boundaries of the eight designated Seattle historic districts or within the seven National Register Historic Districts that are located within and are abutting the study area. (FEIS page 3.305). Since the FEIS was published, two new National Register Historic Districts have been recognized: the Mount Baker Park Historic District and the Ravenna-Cowen North Historic District. Neither of the new districts is a City of Seattle Historic District. Both are addressed in greater detail below under the discussion of impacts for each EIS alternative.

Historic districts are defined by a geographical distribution of resources. Redevelopment in the historic district that decreases the historic fabric of a neighborhood is likely to occur if historic buildings are redeveloped or demolished and new buildings are constructed that are not architecturally sympathetic to the existing historic characteristics of the neighborhood. As a neighborhood's concentration of historic structures decreases it is less likely to continue meeting eligibility criteria as a National Register Historic District as described at FEIS 3.306. Development under all alternatives, including replacement or alteration of homes under existing SF 5000 zoning in the No Action Alternative, could adversely

affect the overall cohesiveness of the historic district if historic resources are altered or demolished and new buildings are constructed that are not architecturally sympathetic to the existing historic characteristics of the neighborhood (see also FEIS at pages 3.305 - 3.306). Redevelopment at an incrementally greater scale than the existing pattern of structures has a higher likelihood of being unsympathetic to existing context. There is potential for adverse impact from such development in National Register Historic Districts that are not City of Seattle Historic Districts. The FEIS considered that there could be additional impacts in potential newly-created historic districts, consistent with the scenario presented in this addendum. (See FEIS 3.305).

National Register Historic District status promotes higher awareness of historic fabric afforded by district status; individual historic resources in historic districts may be eligible for State and local preservation incentives, which could provide some measure of mitigation. However, indirect impacts to historic resources are expected under all alternatives if infill development within a National Register Historic District takes place in a way that is out of scale or not architecturally sympathetic to its surroundings and therefore erodes the National Register Historic District's integrity of setting or place.

Under Alternative 2, 3 and Preferred, the Roosevelt urban village boundary would extend further into the Ravenna-Cowen North Historic District, and the North Rainier Urban Village Boundary would extend into the Mount Baker Park Historic District. Where (M1) or (M2) tier zoning changes are proposed in these expansion areas there is potential to lead to an incrementally greater scale of development compared to No Action, which could be less congruous with the architectural characteristics of the districts. The degree of incremental scale that could be conveyed by MHA implementation and the extent of the village expansion into the districts varies across the action alternatives and is discussed below for each alternative. Indirect impacts to the district could also occur due to future development where a portion of the National Register Historic District is already within an urban village, and an (M1) or (M2) tier MHA zoning change would allow for incrementally greater scale of development. The only place this occurs under the proposal is in a portion of the newly designated Ravenna-Cowen North Historic District that is within the Roosevelt Urban Village.

MHA (M) tier zoning capacity increases are proposed under Action Alternatives 2, 3 and the Preferred Alternative for multifamily and commercially zoned lands that are outside of urban villages. These types of zoning changes would occur within the Montlake Historic District in the same configuration under all three action alternatives affecting five land parcels near Montlake Blvd. E. and Montlake Pl. E., and eleven parcels of land near E. Lynn St. and 24th Ave. E. The (M) tier zoning changes in these locations are a height increase of 10 feet or less, and would not result in more than a minor impact under any of the alternatives.

Impacts of Alternative 2

City of Seattle Landmarks and NRHP Determined Eligible Resources

Under Alternative 2, MHA zone changes could cause an incrementally greater scale of redevelopment compared to the No Action alternative. As discussed above, redevelopment at the location of a Landmark could cause adverse impacts to the Landmark if not fully mitigated by the Certificate of Approval. Redevelopment near a Landmark or NRHP Determined Eligible resource could impact the resource, particularly if the redevelopment is not subject to SEPA and DON review. NRHP Determined Eligible resources, sites that are potentially historic resources as identified in the City's database, and sites that contain buildings or structures that are 50 years old or older that may also be eligible, that are not City of Seattle Landmarks are at risk of impact due to redevelopment of the site, particularly where not subject to SEPA and DON review.

There is higher potential for adverse impacts from development in higher MHA zone tier ((M1) or (M2)) areas where it would occur near, or on the site of, a Landmark or an NRHP Determined Eligible resource. Exhibit A.5 below lists the number of City of Seattle Landmarks and NRHP Determined Eligible resources by MHA Tier for study area urban villages under Alternative 2. Maps in the appendix show the location of the Landmarks and NRHP Determined Eligible resources. Maps in the appendix allow identification of any instances where the proposed MHA zoning designation is different on properties adjacent to or across the street from the resource.

Exhibit A.5 Alternative 2 - City Landmarks and NRHP Determined Eligible Resources by MHA Tier Capacity Increase

Urban Village	City of Seattle Landmarks			NRHP Determined Eligible Resources		
	(M)	(M1)	(M2)	(M)	(M1)	(M2)
23rd & Union-Jackson	10	7	-	13	2	-
Admiral	3	-	-	1	-	-
Aurora-Licton Springs	1	-	-	-	-	-
Ballard	5	-	-	5	-	-
Bitter Lake	-	-	-	3	-	-
Columbia City	-	-	-	6	-	-
Crown Hill	-	-	-	-	-	-
Eastlake	7	-	-	21	-	-
First Hill-Capitol Hill	22	13	-	61	31	-
Fremont	4	-	-	1	-	-
Green Lake	2	-	-	2	-	-
Greenwood-Phinney Ridge	1	-	-	2	-	-
Lake City	2	-	-	-	-	-
Madison-Miller	1	-	-	7	-	-
Morgan Junction	1	-	-	3	-	-
North Beacon Hill	1	-	-	1	2	2
North Rainier	1	-	-	9	-	-
Northgate	-	-	-	1	-	-
Othello	-	-	-	2	-	1
Rainier Beach	1	-	-	-	-	-
Roosevelt	-	-	-	6	16	2
South Park	2	-	-	1	-	-
Upper Queen Anne	3	-	-	3	-	-
Wallingford	3	-	-	3	-	-
West Seattle Junction	2	-	-	-	-	-
Westwood-Highland Park	-	-	-	-	1	-

Note: Sites in zones where an MHA zone capacity increase would not affect the scale of potential redevelopment, including publicly owned schools that would not be redeveloped, and sites within a Major Institutional Overlay governed by other redevelopment standards are not counted in the table, though the sites are indicated on maps in the appendix.

Note: Shaded rows indicate urban villages with Landmarks or NRHP Determined Eligible Sites in an (M1) or (M2) MHA zone change area.

Under Alternative 2, six urban villages have City of Seattle Landmarks or NRHP Determined Eligible resources in locations with a proposed (M1) or (M2) tier that would lead to a higher potential for impact to setting or context of a landmark or

NRHP Determined Eligible resource if redevelopment occurs under the alternative: 23rd and Union-Jackson, First-Hill Capitol Hill, North Beacon Hill, Othello, Roosevelt, and Westwood Highland Park. Discussion below highlights locations and resources in these villages with (M1) or (M2) tier zoning change areas where adverse impact is more likely, although it is not practical to describe every single scenario and maps in the appendix should also be consulted.

23rd & Union-Jackson: Of the seven City of Seattle Landmarks in an (M1) zoning change area identified in the table above for the 23rd & Union-Jackson urban village, six are single-family home structures in the Victorian architectural style near the southeast corner of 23rd Ave. and Marion St. These homes are a part of the Twenty-third Avenue Houses Group City of Seattle Landmark – a group of homes designated in 1979. Zoning of these sites and their vicinity would change from SF 5000 to LR1 under the alternative. The seventh City of Seattle Landmark identified in the table is the City Light electrical substation at 23rd and E. Pine St. The substation is not expected to be impacted by a zoning change because it is a publicly owned property in utility use unlikely to redevelop, and because its occupation of the bulk of an entire city block renders its presence unlikely to be diminished by adjacent development.

First Hill-Capitol Hill: Of the thirteen City of Seattle Landmarks in an (M1) zoning change area identified in the table for First Hill-Capitol Hill, eight are in existing multifamily residential neighborhoods in the area generally bounded by E. Thomas St. and E. Pine St. Landmark buildings here include historic masonry multifamily structures such as the Hillcrest Apartments (1909), residential structures that have been converted to other uses such as the Gaslight Inn/Singermann House (1910), and religious institutions such as the First Church of Christ Scientist. Three of the Landmarks in an (M1) zoning change area are in a cluster of resources including NRHP Determined Eligible resources and Landmarks in an existing multifamily residential neighborhood at the north edge of the urban village in blocks to the south and north of E. Roy St. Resources here include masonry multifamily buildings such as the Anhalt Apartments (1930), and smaller wood framed multifamily structures such as the Vender Meulen Fourplex (1923), and the Peterson Apartments (1925). In both areas existing zoning is LR3 and would be converted to the MR zone in the alternative. The remaining two Landmarks in the (M1) zoning change area are Pantages House at the corner of E. Denny Way and Harvard Avenue, and the Lincoln Reservoir. Pantages House was already developed in the mid 2000's with multifamily housing on the site that is owned by a not for profit affordable housing provider, while the historic residence was concurrently preserved. It is unlikely to be further affected by the proposed MHA zone change because further redevelopment within twenty years is unlikely. The Lincoln Reservoir, within a publicly owned park property that occupies a full city block is also not expected to be impacted by the MHA zone change, because development in the park is not expected, and the site is buffered from adjacent areas by rights of way.

A total of thirty-one NRHP Determined Eligible resources are in the (M1) zoning change area as identified in the table. Fourteen of these are generally within the Broadway Ave. E. corridor between E. Pine St. and E. Republican St. Several of the buildings in this area are one to six story retail and mixed-use structures that front onto Broadway and were built in the early part of the 20th century, such as the Wilshire Building (1903), and the Capitol Building (1924). While others such as Dick's Drive In (1955) and the US Post Office (1951) are mid-century structures. Due to a unique existing zoning condition on Broadway that allows for 65-foot high residential development in the existing NC-40 zone, the effective zoning increase from Alternative 2 on these resources is a ten-foot height increase and would not be expected to have more than a minor impact compared to the No Action Alternative.

Fourteen of NRHP Determined Eligible resources in the (M1) zoning change area are in the multifamily residential area at the north edge of the urban village described in the discussion of City of Seattle Landmarks for that vicinity. Aside from these, the remaining NRHP Determined Eligible resources in the (M1) zoning change are the Figaro Apartments (1914) and

the Astor Court Apartments (1926), which are both three story masonry structures, and the Tudor Manor apartment court on 14th Ave. E. near E. Denny Way. These three resources are in an existing LR3 zone that is proposed for MR under the alternative.

North Beacon Hill: Two NRHP Determined Eligible resources are in an (M2) MHA rezone area. One is the El Centro De La Raza building which is in non-profit ownership and has recently had co-development on the site. The resource and on-site co-development occupy the full block and no further impact from proposed zoning change is expected due to buffering of adjoining areas by right of ways and because the scale of the existing structure is much larger than structures in adjacent areas. The second resource in an (M2) rezone area is St. Peter's Catholic Church at 2807 15th Ave. S. The brick church is in an existing SF 5000 zone that would be rezoned to LR3. Development adjacent to the site under proposed zoning could adversely impact the resource if designed in a manner that reduces the visibility or prominence of the church or is in a style or material unsympathetic to the church structure.

Two NRHP Determined Eligible resources are in an (M1) MHA rezone area. One is a single-story commercial structure at 2519 15th Ave. S. The proposed zoning change is from NC-65 to NC-75, an increment of ten additional feet, which is not expected to cause more than a minor impact compared to redevelopment that could occur under existing conditions. The second is a brick single-family home structure at 3401 15th Ave. S. in an area of existing SF 5000 zoning that is proposed for LR1 under the alternative.

One City of Seattle Landmark, the Beacon Hill First Baptist Church, is across the street from an (M2) MHA zone change under Alternative 2. Land across 16th Ave. S. from the church would be changed from SF 5000 to LR3 zoning. Redevelopment under proposed zoning across the street from the church could be at a significantly larger scale than the existing context of single-family homes. However, the properties across the street from the church are not a major aspect of the Landmark's significance, and redevelopment on them would be physically separated from the church structure by a street right of way. Redevelopment directly across the street from the Landmark would be subject to DON historic review. Therefore, impacts to the First Baptist Church are not expected to be significant.

The Beacon Hill Garden House at 2336 15th Ave. S. is currently undergoing the Landmark nomination process. Under Alternative 2, land across the alley to the east would be rezoned from SF 5000 to LR2. Redevelopment under proposed zoning across the alley from the garden house could be at a larger scale than the existing context of single-family homes. The properties across the alley from the garden house are not a major aspect of the potential Landmark's significance. Redevelopment on properties across the alley would be physically separated from the garden house by the alley and the garden house's on-site parking lot. If the garden house is landmarked, redevelopment directly across the alley would be subject to DON historic review. Therefore, impacts to the garden house are not expected to be significant.

Othello: There is one NRHP Determined Eligible Resource in an (M2) MHA rezone area under Alternative 2. A craftsman style single-family home at 3928 S. Eddy St. is in an area of existing SF 5000 zoning that would be rezoned to LR3. If redevelopment occurs under the proposed zoning there would likely be impact to the resource due to the effects of greater scale.

Roosevelt: In Roosevelt two NRHP Determined Eligible resources are within an (M2) MHA zoning change area, and sixteen are in an (M1) MHA zone change area. The two resources in the (M2) area, and five of the resources in the (M1) area are in the blocks south of Roosevelt High School. These are single-family home structures built in the early part of the 20th century, although the area is already zoned for multi-story mixed use development. The MHA zoning change is not as large as the

(M1) and (M2) suffix suggests — a change of ten feet in allowed height from the NC-65 to NC-75. Under existing zoning, the area already has incentive zoning that requires affordable housing due to a rezone in 2012. To reflect the capacity increase conveyed by the prior rezone, a relatively higher MHA contribution amount is ascribed under the MHA rezone with an (M1) or (M2) suffix, even though the effect of the MHA rezone itself is only a one-story increase.

Fourteen NRHP Determined Eligible resources are within an (M1) MHA rezone area generally flanking 12th Ave. and Brooklyn Ave. NE corridors, south of NE 65th St. These are a group of single-family residences built in the early 20th century in styles including craftsman and Tudor. The proposed zone change is from SF 5000 to the LR1 zone, creating potential for adverse impact to resources if new development is a larger scale and occupies greater portions of lots than the existing structures in the area. One NRHP Determined Eligible resource is a home at on NE 68th St. that is already in a mixed-use commercial zone. One NRHP Determined Eligible resource is in the urban village expansion area and would be rezoned from SF- 5000 to RSL.

Westwood-Highland Park: There is one NRHP Determined Eligible Resource in an (M1) MHA rezone area under Alternative 2. The St. James Lutheran Church is currently in a SF 5000 zone that would be rezoned to LR2. The church is a significantly larger scale than surrounding home structures and occupies a prominent corner location. As a result, redevelopment under the proposed MHA rezone in the vicinity would not be expected to cause more than minor impacts to the resource.

National Register Historic Districts

Mount Baker Park Historic District: Under Alternative 2 the North Rainier urban village would expand east of 30th Ave. S into the Mount Baker Park Historic District. Two blocks within the expansion area would be rezoned from SF 5000 to RSL, which would be an (M) tier MHA zoning change, and three blocks within the urban village expansion would be rezoned from SF 5000 to LR1, an (M1) tier zoning change. These areas include a concentration of existing single-family residences from the early 20th century.

Potential redevelopment in the RSL zone under the alternative would be at a similar scale to the existing historic structures but could lead to reduced setback spaces and a greater density of structures on site. Potential future SEPA exempt redevelopment in the RSL zone has the potential to create impacts to the district, but those impacts would not be significant because any redevelopment allowed under RSL would be similar in scale to the existing zoning. Relative to the potential redevelopment that could occur under existing SF 5000 zoning, redevelopment under proposed RSL zone would have a similar likelihood of being contextual and sympathetic to the historic scale and architectural style of homes in the district, and therefore impacts are not significant.

Potential redevelopment under the (M1) MHA tier zoning changes in the three-block LR1 zoned area, could be at a scale that is different from the area's historic configuration of buildings including smaller setbacks and structures with greater bulk than existing homes. If affecting contributing structures, the redevelopment could erode cohesiveness of the district. (See also FEIS 3.305-3.306.) Most redevelopment in the LR1 zone would be subject to SEPA review such that the project's impacts would be considered at the time of project review. If mitigation measures described in the FEIS and addendum are not adopted, and if development is not subject to project level review, impacts from potential redevelopment under this (M1) tier zoning change in the district could be significant. (See also discussion at FEIS 3.126.)

Ravenna-Cowen North Historic District - Under Alternative 2 the Roosevelt urban village would expand east of 15th Ave. NE to include one block in the historic district. Additionally, seven and one-half blocks within the existing Roosevelt urban

village are within the historic district. Both areas include a concentration of existing single-family residences from the early 20th century.

In the urban village expansion area, all proposed zone changes are (M) tier MHA zone changes and would be at a similar scale to the existing structures, including potential redevelopment on fourteen residential parcels that would be rezoned from SF 5000 to RSL. Redevelopment could lead to reduced setback spaces and a greater density of structures on site. Potential future SEPA exempt redevelopment has the potential to create impacts to the district, but those impacts would not be significant because any redevelopment allowed under RSL would be similar in scale to the existing zoning. Relative to the potential redevelopment that could occur under existing SF 5000 zoning, redevelopment under proposed RSL zone would have a similar likelihood of being contextual and sympathetic to the historic scale and architectural style of homes in the district, and therefore impacts are not significant.

Within the existing Roosevelt urban village, proposed zone changes on four of the blocks would be from SF 5000 to RSL and three and one-half blocks would be rezoned from SF 5000 to LR1. Potential redevelopment in both zoning change areas could be different from the area's historic scale including smaller setbacks and structures with greater bulk than existing homes, with the effects being greater in the LR1 zone. If affecting contributing structures, the redevelopment in the proposed LR1 zone could erode cohesiveness of the district. (See also FEIS 3.305-3.306.) Most redevelopment in the LR1 zone would be subject to SEPA review such that the project's impacts would be considered at the time of project review. If mitigation measures described in the FEIS and addendum are not adopted, and if development is not subject to project level review, impacts from potential redevelopment in areas of (M1) tier zoning changes in the district could be significant. (See also discussion at FEIS 3.134.)

Impacts of Alternative 3

City of Seattle Landmarks and NRHP Determined Eligible Resources

Under Alternative 3 MHA zone changes could cause an incrementally greater scale of redevelopment on sites as compared to the No Action alternative. As discussed above, redevelopment at the location of a Landmark could cause adverse impacts to the Landmark if not fully mitigated by the Certificate of Approval. Redevelopment near a Landmark or NRHP Determined Eligible resource could impact the resource, particularly if the redevelopment is not subject to SEPA and DON review. NRHP Determined Eligible resources, sites that are potentially historic resources as identified in the City's database, and sites that contain buildings or structures that are 50 years old or older that may also be eligible, that are not City of Seattle Landmarks are at risk of impact due to redevelopment of the site, particularly where not subject to SEPA and DON review.

There is higher potential for adverse impacts from development in higher MHA zone tier ((M1) or (M2)) areas where it would occur near, or on the site of, a Landmark or an NRHP Determined Eligible resource. Exhibit A.6 below lists the number of City of Seattle Landmarks and NRHP Determined Eligible resources by MHA Tier for study area urban villages under Alternative 3. Maps in the appendix show the location of the Landmarks and NRHP Determined Eligible resources. Maps in the appendix allow identification of any instances where the proposed MHA zoning designation is different on properties adjacent to or across the street from the resource.

Exhibit A.6 Alternative 3 - City Landmarks and NRHP Determined Eligible Resources by MHA Tier Capacity Increase

Urban Village	City of Seattle Landmarks			NRHP Determined Eligible Sites		
	(M)	(M1)	(M2)	(M)	(M1)	(M2)
23rd & Union-Jackson	16	1	-	13	2	-
Admiral	2	1	-	-	1	-
Aurora-Licton Springs	1	-	-	-	-	-
Ballard	5	-	-	5	-	-
Bitter Lake	-	-	-	3	-	-
Columbia City	-	-	-	6	-	-
Crown Hill	-	-	-	-	-	-
Eastlake	4	3	-	5	16	-
First Hill-Capitol Hill	34	1	-	83	9	-
Fremont	1	2	1	1	-	-
Green Lake	-	2	-	-	2	-
Greenwood-Phinney Ridge	1	-	-	2	-	-
Lake City	2	-	-	-	-	-
Madison-Miller	-	1	-	6	1	-
Morgan Junction	1	-	-	3	-	-
North Beacon Hill	1	-	-	1	2	1
North Rainier	1	-	-	9	-	-
Northgate	-	-	-	1	-	-
Othello	-	-	-	-	-	-
Rainier Beach	1	-	-	-	-	-
Ravenna	-	-	-	-	-	-
Roosevelt	-	-	-	-	21	3
South Park	-	-	-	1	-	-
Upper Queen Anne	3	-	-	3	-	-
Wallingford	3	-	-	3	-	-
West Seattle Junction	2	-	-	-	-	-
Westwood-Highland Park	-	-	-	1	-	-

Note: Sites in zones where an MHA zone capacity increase would not affect the scale of potential redevelopment, including publicly owned schools that would not be rezoned, and sites within a Major Institutional Overlay governed by other redevelopment standards are not counted in the table, though the sites are indicated on maps in the appendix.

Under Alternative 3, nine urban villages have City of Seattle Landmarks or NRHP Determined Eligible resources in locations with a proposed (M1) or (M2) tier that could lead to a higher potential for impact to setting or context of a Landmark or NRHP Determined Eligible resource if redevelopment occurs under the alternative. These villages are indicated with shading in Exhibit A.6 above. In Alternative 3, high opportunity urban villages have relatively greater MHA zone changes compared to Alternative 2, as more development capacity is added to urban villages with high access to opportunity and low displacement risk in Alternative 3. Because of this, Landmarks and NRHP Determined Eligible resources have a greater risk of impact from redevelopment. Discussion below highlights locations and resources in these villages with the (M1) or (M2) tier zoning change areas where adverse impact is more likely, although it is not practical to describe every scenario and maps and tables in the appendix should also be consulted.

23rd & Union-Jackson: The only Seattle Landmark that is in an (M1) rezone area under Alternative 3 is the City Light electrical substation at 23rd Ave. and E. Pine St. As discussed for Alternative 2 the substation is not expected to be impacted by a zoning change. Two NRHP Determined Eligible resources would be in an (M1) rezone area. One is the Richlin's Grocery building near 23rd Ave. and Union St., which would remain in a Neighborhood Commercial zone but have a height limit increase from a 30 to a 55-foot height limit. The other is the single-family home at 906 23rd Ave. S. which would have a zoning change from the SF 5000 to the LR1 zone.

Admiral: In Admiral, the City of Seattle Landmark Admiral Theatre would be in an (M1) tier zone change under Alternative 3. Zoning would change for the site and its vicinity from Neighborhood Commercial with a 40-foot height limit to Neighborhood Commercial with a 75-foot height limit.

Eastlake: In Eastlake under Alternative 3, three City of Seattle Landmarks and nine NRHP Determined Eligible resources would be in an (M1) MHA rezone area. The NRHP Determined Eligible resources are existing multifamily and single-family residential structures generally with two to four stories that were built in the early 20th century along the Franklin Ave. E. and Boylston Ave. E. corridors. Proposed zoning changes are from the existing LR3 zone to the MR zone, and from the existing LR2 zone to the LR3 zone in these areas.

The two City of Seattle Landmarks that would be in the (M1) MHA rezone area are the Seward School, and the Nelson/Steinbreuck House on Franklin Ave. E. The area would be changed from an existing LR2 zone to the LR3 zone.

First Hill-Capitol Hill: Fewer City of Seattle Landmarks and NRHP Determined Eligible resources would be impacted under Alternative 3 compared to Alternative 2. One City of Seattle Landmark, Pantages House, would be in an area with an (M1) MHA rezone. As discussed above for Alternative 2 It is unlikely to be further affected by the proposed MHA zone change due to recent co-development on site that preserved the resource.

NRHP Determined Eligible resources with an (M1) MHA rezone include mixed-use and commercial buildings along Broadway Ave. E. generally between E. Pine St. and E. Harrison St. Several of the buildings in this area are one to six story retail and mixed-use structures that front onto Broadway and were built in the early part of the 20th century such as the Capitol Building (1924). Others such as Dick's Drive In (1955) and the US Post Office (1951) are mid-century structures. Due to a unique existing zoning condition on Broadway that allows for 65-foot high residential development in the existing NC-40 zone, the effective zoning increase from Alternative 3 on these resources is a ten-foot height increase and would not be expected to have more than a minor impact compared to the No Action Alternative.

Fremont: Two City of Seattle Landmarks in Fremont, the Fremont Hotel, and the B.F. Day Elementary School would be in an (M1) area. The zoning change for the B.F. Day Elementary School and vicinity would be from LR2 to LR3 but would not be expected to impact the publicly owned school site because redevelopment of the school property which occupies a full block is unlikely. The Fremont Hotel zoning would change from NC-40 to NC-75. One City of Seattle Landmark, at Woodland Park Ave. N. and N. 38th St., is a one-story mid-20th century office structure and would be in an (M2) capacity increase area. The site and vicinity would be rezoned from a Commercial zone with a 40-foot height limit to a Neighborhood Commercial zone with a 75-foot height limit (NC-75).

Green Lake: Two Landmarks in Green Lake would be in an (M1) area. The Green Lake Library is in an existing LR2 zone that would change to LR3. Fire Station Sixteen would be in an existing LR3 zoned area that would be converted to MR. The

Freeway Prototype Community Fallout Shelter is a NRHP Determined Eligible resource in this urban village. It is below Interstate 5 and would not be impacted as this area would not incur a zoning change from the MHA proposal.

Madison-Miller: One Landmark, the Mt. Zion Baptist Church at 19th Ave. E. and E. Madison St. would be in an (M1) area. The resource would be rezoned from LR3 to MR under Alternative 3, though adjacent parcels would have only an (M) tier capacity increase. The church is also a NRHP Determined Eligible resource.

North Beacon Hill: The El Centro De La Raza building is the only NRHP Determined Eligible resources in an (M2) MHA rezone area under Alternative 3. As described above for Alternative 2 it is not expected to be adversely impacted due to the MHA zoning change.

Two NRHP Determined Eligible resources are in an (M1) MHA rezone area. One is a single-story commercial structure at 2519 15th Ave. S. The proposed zoning change is from NC-65 to NC-75, an increment of ten additional feet, which is not expected to cause more than a minor impact compared to redevelopment that could occur under existing conditions. The second is St. Peter's Catholic Church at 2807 15th Ave. S., which would be changed from the SF 5000 zone to the LR1 zone under Alternative 3. Since the scale of LR1 development that could occur near the church would not exceed that of the existing church structure, the likelihood of impact to this resource due to scale effects is less than under Alternative 2.

One City of Seattle Landmark, the Beacon Hill First Baptist Church, is across the street from an (M1) MHA zone change under Alternative 2. Land across 16th Ave. S. from the church would be changed from SF 5000 to LR1 zoning. Redevelopment under proposed zoning across the street from the church could be at a slightly larger scale or have smaller setbacks compared to the existing context of single-family homes. Potential impacts to the church would be less than those discussed above for Alternative 2.

The Beacon Hill Garden House at 2336 15th Ave. S. is currently undergoing the Landmark nomination process. Under Alternative 3 land across the alley to the east would be rezoned from SF 5000 to LR1. Redevelopment under proposed zoning across the alley from the garden house could be at a larger scale than the existing context of single-family homes. Potential impacts to the garden house would be less than those discussed above for Alternative 2.

Roosevelt: In Roosevelt, the same NRHP Determined Eligible resources would be affected in Alternative 3 as in Alternative 2, but the degree of zoning change for these resources would be greater as more of them would be in the (M1) and (M2) tier zone increase areas. Most of these are single-family residences built in the early 20th century in the craftsman and Tudor architectural styles. Under Alternative 3, compared to Alternative 2, additional properties in the 12th Ave. and Brooklyn Ave. corridors would change from SF 5000 to LR2, instead of LR1. One NRHP Determined Eligible resource would be in an (M1) rezone area in the proposed urban village expansion area on 16th Ave. NE, in an area that would be rezoned from SF 5000 to LR1. One NRHP Determined Eligible single-family residence at the southwest corner of NE 68th St. and 12th Ave. NE would be rezoned from LR3 to MR. Impacts to NRHP Determined Eligible resources in the blocks directly south of Roosevelt High School would be the same as under Alternative 2.

National Register Historic Districts

Mount Baker Park Historic District: Under Alternative 3 the North Rainier Urban Village would expand to the east but would not cross 30th Ave. S. into the Mount Baker Park Historic District. Zoning changes adjacent to the district would be from SF

5000 to RSL, and for one block at the southwest corner of S. McLellan St. and 30th Ave. SW zoning would change from SF 5000 to LR1. Potential redevelopment in these adjacent areas would not be expected to create more than minor indirect impacts to the district.

Ravenna-Cowen North Historic District: Under Alternative 3 the Roosevelt Urban Village would expand east of 15th Ave. NE to include three full blocks in the historic district and the northernmost portion of three blocks on the south frontage of NE 65th St. Seven and one-half blocks within the existing Roosevelt Urban Village are within the historic district. Both areas include a concentration of existing single-family residences from the early 20th century.

In the urban village expansion area, residential parcels off arterial streets would be rezoned from SF 5000 to RSL in an (M) tier MHA rezone area, and residential parcels fronting 15th Ave. NE and NE 65th Streets would be rezoned from SF 5000 to Lowrise 1 in an (M1) tier MHA rezone area. A grouping of four parcels near the southeast corner of NE 65th St. and 12th Ave. NE would be rezoned from SF 5000 to NC-55, which is an (M2) MHA rezone. Proposed zoning changes in the (M) tier would be at a similar scale to existing structures including redevelopment in the RSL zone. Potential future SEPA exempt redevelopment in the RSL zone has the potential to create impacts to the district, but those impacts would not be significant because any redevelopment allowed under RSL would be similar in scale to the existing zoning, but with reduced setbacks and greater density of structures on site. Potential redevelopment in the LR1 zone and the NC-55 zone could be at a scale that is different from the area's historic fabric including smaller setbacks and structures with greater bulk than existing structures. Much of the potential redevelopment in the LR1 zone and NC-55 zone likely would be subject to SEPA review such that the project's impacts would be considered at the time of project review.

Within the existing Roosevelt Urban Village, most of the zoning changes would be from SF 5000 to LR1 and a portion of one block at the northwest corner of NE 64th St. and Brooklyn Ave. NE would be changed to the LR2 zone. Potential redevelopment in both zoning change areas likely could diverge from the scale of historic structures in the area, such as including smaller setbacks and structures with greater bulk than existing homes. Much of the redevelopment in the LR1 and LR2 zones likely would be subject to SEPA review. Potential future redevelopment under Alternative 3 has the potential to create impacts to the historic district that are greater in severity to Alternative 2. If affecting contributing structures, the redevelopment could erode the cohesiveness of the district. (See also FEIS 3.305-3.306.) If mitigation measures described in the FEIS and addendum are not adopted, impacts from potential redevelopment under the (M1) and (M2) tier zoning changes in the proposed expansion area and within the existing urban village could be significant. (See also discussion at FEIS 3.134.)

Impacts of the Preferred Alternative

City of Seattle Landmarks and NRHP Determined Eligible Resources

Under the Preferred Alternative MHA zone changes could cause an incrementally greater scale of redevelopment compared to the No Action alternative. As discussed above, redevelopment at the location of a Landmark could cause adverse impacts to the Landmark if not fully mitigated by a Certificate of Approval. Redevelopment near a Landmark or NRHP Determined Eligible resource, could impact the resource, particularly if the redevelopment is not subject to SEPA and DON review. NRHP Determined Eligible resources, sites that are potentially historic resources as identified in the City's database, and sites that contain buildings or structures that are 50 years old or older that may also be eligible, that are not City of Seattle Landmarks are at risk of impact due to redevelopment of the site, particularly where not subject to SEPA and DON review.

There is higher potential for adverse impacts from development in higher MHA zone tier ((M1) and (M2)) areas where it would occur near, or on the site of, a Landmark or an NRHP Determined Eligible resource. Exhibit A.7 below lists the number of City of Seattle Landmarks and NRHP Determined Eligible resources by MHA Tier for study area urban villages. Maps in the addendum show the location of the Landmarks and NRHP Determined Eligible resources. Maps in the appendix allow identification of any instances where the proposed MHA zoning designation is different on properties adjacent to or across the street from the resource.

Exhibit A.7 Preferred Alternative - City Landmarks and NRHP Determined Eligible Resources by MHA Tier Capacity Increase

Urban Village	City of Seattle Landmarks			NRHP Determined Eligible Resources		
	(M)	(M1)	(M2)	(M)	(M1)	(M2)
23rd & Union-Jackson	16	1	-	12	2	-
Admiral	3	-	-	1	-	-
Aurora-Licton Springs	1	-	-	-	-	-
Ballard	5	-	-	5	-	-
Bitter Lake	-	-	-	3	-	-
Columbia City	-	-	-	6	-	-
Crown Hill	-	-	-	-	-	-
Eastlake	7	-	-	21	-	-
First Hill-Capitol Hill	33	2	-	75	17	-
Fremont	1	3	-	1	-	-
Green Lake	1	1	-	2	-	-
Greenwood-Phinney Ridge	1	-	-	2	-	-
Lake City	2	-	-	-	-	-
Madison-Miller	-	1	-	5	2	-
Morgan Junction	1	-	-	3	-	-
North Beacon Hill	1	-	-	1	2	2
North Rainier	1	-	-	9	-	-
Northgate	-	-	-	1	-	-
Othello	-	-	-	-	-	-
Rainier Beach	1	-	-	-	-	-
Ravenna	-	-	-	-	-	-
Roosevelt	-	-	-	1	20	3
South Park	2	-	-	1	-	-
Upper Queen Anne	3	-	-	3	-	-
Wallingford	3	-	-	3	-	-
West Seattle Junction	2	-	-	-	-	-
Westwood-Highland Park	-	-	-	-	1	-

Note: Sites in zones where an MHA zone capacity increase would not affect the scale of potential redevelopment, including publicly owned schools that would not be rezoned, and sites within a Major Institutional Overlay governed by other redevelopment standards are not counted in the table, though the sites are indicated on maps in the appendix.

Under the Preferred Alternative, eight urban villages have City of Seattle Landmarks or NRHP Determined Eligible resources in locations with a proposed (M1) or (M2) tier capacity increase that would lead to a higher potential for impact to setting or context of a Landmark or NRHP Determined Eligible resource if redevelopment occurs under the alternative. Urban villages shaded in Exhibit A.7 above would be affected to this degree. Compared to Alternative 3, the Preferred Alternative has slightly less potential to impact resources as development capacity increases are at a lower intensity in some urban villages with high access to opportunity, including Eastlake and Admiral. Discussion below highlights locations and resources in urban villages in the (M1) or (M2) tier zoning change areas where adverse impact is more likely, although it is not practical to discuss all scenarios and maps and tables in the appendix should also be consulted.

23rd and Union-Jackson: Three NRHP Determined Eligible resource would be in an (M1) rezone area under the Preferred Alternative. The Richlin's Grocery building near 23rd Ave. and Union St. would remain in a Neighborhood Commercial zone but have a height limit increase from a 30 to a 55-foot height limit. A single-family home at 906 23rd Ave. S. would have a zoning change from the SF 5000 to the LR1 zone. The Black Manufacturing building at 1130 Rainier Ave. S. would be changed from an Industrial Commercial zone with a 65-foot height limit to a Neighborhood Commercial zone with a 75-foot height limit.

First Hill-Capitol Hill: The same two Landmarks as in Alternative 2 would be within an (M1) capacity increase area under the Preferred Alternative: the Pantages Apartments and the Lincoln Reservoir. As discussed above for Alternatives 2 and 3 the unique circumstances of these resources mean that they are not expected to be further impacted by the MHA zone changes.

Like Alternative 2, a cluster of seventeen NRHP Determined Eligible resources within the Broadway Ave. E. corridor between E. Pine St. and E. Roy St. would be within an (M1) MHA rezone area. Many of the buildings in this area are one to six story retail and mixed-use structures that front onto Broadway and were built in the early part of the 20th century, such as the Wilshire Building (1903), and the Capitol Building (1924). Others such as Dick's Drive In (1955) and the US Post Office (1951) are mid-century structures. Due to a unique existing zoning condition on Broadway that allows for 65-foot high residential development in the existing NC-40 zone, the effective zoning increase from the Preferred Alternative on these properties is a ten-foot height increase and would not be expected to have more than a minor impact compared to the No Action Alternative.

Fremont: Three Landmarks in Fremont would be in an (M1) MHA rezone area. As in Alternative 3, zoning for the Fremont Hotel site and vicinity would change from NC-40 to NC-75, and zoning for the B.F. Day site and vicinity would change from LR2 to LR3. A one-story midcentury office structure at Woodland Park Ave. N. and N. 38th St. would be in an (M1) capacity increase area. This site and vicinity would be rezoned from a Commercial zone with a 40-foot height limit to an NC zone with a 75-foot height limit (NC-75).

Green Lake: One Landmark in Green Lake would be in an (M1) MHA rezone area. The Green Lake Library is in an existing LR2 zone that would change to LR3. As a publicly owned site it is not expected to redevelop in a way that would impact the historic characteristics of the resource.

Madison-Miller: Under the Preferred Alternative, like Alternative 3, the Mt. Zion Baptist Church at 19th Ave. E. and E. Madison St. is a City of Seattle Landmark that would be in an (M1) MHA rezone area. The resource would be rezoned from LR3 to MR. Mount Zion Baptist Church is also a NRHP Determined Eligible resource. The three-story brick Clairingle Apartments at 1803 E. John St. is a NRHP Determined Eligible resource that would be in an (M1) MHA zoning change area. The property would be rezoned from an existing LR2 zone to the LR3 zone.

North Beacon Hill: As in Alternative 2 two NRHP Determined Eligible resources are in an (M2) MHA rezone area. One is the El Centro De La Raza building which is in non-profit ownership and has recently had co-development on the site. The resource and on-site co-development occupy the full block and no further impact from proposed zoning change is expected due to buffering of adjoining areas by right of ways and because the scale of the existing structure is much larger than adjacent areas. The second resource in an (M2) rezone area is St. Peter's Catholic Church at 2807 15th Ave. S. The brick church is in an existing SF 5000 zone that would be rezoned to LR3. Development adjacent to the site under proposed

zoning could adversely impact the resource if designed in a manner that reduces the visibility or prominence of the church or is in a style or material unsympathetic to the church structure.

Two NRHP Determined Eligible resources are in an (M1) MHA rezone area. One is a single-story commercial structure at 2519 15th Ave. S. Proposed zoning change is from NC-65 to NC-75, an increment of ten additional feet, which is not expected to result in more than a minor impact compared to existing conditions. The second is a single-family home structure at 3401 15th Ave. S. in an area of existing SF 5000 zoning that is proposed for LR1 under the alternative.

One City of Seattle Landmark, the Beacon Hill Frist Baptist Church, is across the street from an (M2) MHA zone change under the Preferred Alternative. Land across 16th Ave. S. from the church would be changed from SF 5000 to LR3 zoning, and the resulting impacts would be the same as discussed above for Alternative 2.

The Beacon Hill Garden House at 2336 15th Ave. S. is currently undergoing the Landmark nomination process. Under the Preferred Alternative, land across the alley to the east would be rezoned from SF 5000 to LR2 and the resulting impacts would be the same as discussed above for Alternative 2.

Roosevelt: Impacts under the Preferred Alternative are similar to Alternative 3, and greater than Alternative 2. Clusters of historic-aged homes built in the craftsman and Tudor architectural styles in the early part of the 20th century could be impacted due to the zoning changes that would allow for building at a larger scale and with reduced setbacks and yard areas compared to existing regulations. NRHP Determined Eligible resources in a cluster of homes in the 12th Ave. corridor and to the northwest of Cowen Park would be affected, as new development could be of a scale or character that is incongruous with existing structures in the area. Properties in the 12th Ave. corridor would change from SF 5000 zoning to the LR1 and LR2 zones.

National Register Historic Districts

Mount Baker Park Historic District - Under the Preferred Alternative the North Rainier Urban Village would expand east of 30th Ave. S into the Mount Baker Park Historic District. Three blocks within the urban village expansion would be rezoned from SF 5000 to RSL. Extension of the urban village into the district is less than Alternative 2, but more than Alternative 3, which does not extend into the district. The expansion area includes a concentration of existing single-family homes from the early 20th century.

Potential redevelopment in the RSL zone under the alternative would be at a similar scale to the existing historic structures but could lead to reduced setback spaces and a greater density of structures on site. Potential future SEPA exempt redevelopment in the RSL zone has the potential to create impacts to the district, but those impacts would not be significant because any redevelopment allowed under RSL would be similar in scale to the existing zoning. Relative to the potential redevelopment that could occur under existing SF 5000 zoning, redevelopment under proposed RSL zone would have a similar likelihood of being contextual and sympathetic to the historic scale and architectural style of homes in the district, and therefore impacts are not significant.

Ravenna Cowen North Historic District - Under the Preferred Alternative the Roosevelt urban village would expand east of 15th Ave. NE to include three full blocks in the historic district. Seven and one-half blocks within the existing Roosevelt urban village are within the historic district. Both areas include a concentration of existing single-family homes from the early 20th century.

Within the proposed urban village boundary expansion area residential parcels would be rezoned from SF 5000 to RSL, an (M) tier capacity increase, with the exception of seven parcels fronting 15th Ave. NE that would be rezoned from SF 5000 to LR1, which is an (M1) tier capacity increase. Proposed zoning changes in the (M) tier would be at a similar scale to existing structures including redevelopment in the RSL zone. Potential future SEPA exempt redevelopment in the RSL zone has the potential to create impacts to the district, but those impacts would not be significant because any redevelopment allowed under RSL would be similar in scale to the existing zoning, but with reduced setbacks and greater density of structures on site. Potential redevelopment in the LR1 zone could be at a scale that is different from the area's historic fabric including smaller setbacks and structures with greater bulk than existing structures. Much of the potential redevelopment in the LR1 zone would be subject to SEPA review such that the project's impacts would be considered at the time of project review.

Within the existing Roosevelt Urban Village, most of the zoning changes would be from SF 5000 to LR1, an (M1) tier MHA zoning change, while a portion of one block at the northwest corner of NE 64th St. and Brooklyn Ave. NE and one additional parcel on Brooklyn Ave. would change to LR2, an (M2) tier capacity increase. Potential redevelopment in both zoning change areas likely could diverge from the scale of historic structures in the area, such as including smaller setbacks and structures with greater bulk than existing homes. Much of the redevelopment in the LR1 and LR2 zones likely would be subject to SEPA review. Potential future redevelopment under The Preferred Alternative has the potential to create impacts to the historic district that are greater in severity to Alternative 2, but less than Alternative 3. If affecting contributing structures, the redevelopment could erode the cohesiveness of the district. (See also FEIS 3.305-3.306.) If mitigation measures described in the FEIS and addendum are not adopted, impacts from potential redevelopment under the (M1) and (M2) tier zoning changes in the proposed expansion area and within the existing urban village could be significant. (See also discussion at FEIS 3.134.)

Mitigation Measures

Additional mitigation measures, and more specific information about potential mitigation is provided below based on information in this addendum. This discussion of mitigation should be read in conjunction with mitigation already described in FEIS Section 3.5.3.

- ***Reduce urban village expansions, reduce the intensity of zone changes or do not apply MHA zoning changes in National Register Historic Districts.*** Adverse impacts to the newly designated Mount Baker Park Historic District and the Ravenna Cowen North Historic District could be reduced if urban villages are not expanded into the districts. Expansion of the North Rainier urban village could be limited in the eastward direction to 30th Ave. S. Expansion of the Roosevelt urban village could be limited in the eastward direction to 15th Ave. NE so as not to enter the historic district. Zoning changes within the Roosevelt urban village in the Ravenna-Cowen North district could be foregone, or reduced to the RSL zone similar to Alternative 2. If no MHA zone changes are made in the National Register Historic Districts there would be no impact from the proposal.
- ***Increase funding for a comprehensive and systematic Historic Resources Survey and Inventory program followed by proactive city-initiated Landmark and district nominations.*** FEIS mitigation discussion at page 3.311 already addresses this measure at bullets 3, 4, and 6. The City's Landmark

review process is the strongest tool currently available to mitigate the impact of new development on or near historic resources. Gaps in protection occur where historic resources, such as NRHP Determined Eligible resources that are not Landmarks, are affected by development, and where clusters of historic-aged resources are not within a City of Seattle historic district. The City could improve its existing inventory database, update it, and make its coverage more comprehensive. Following that step an aggressive program of City-initiated Landmark nominations would extend greater protection to resources.

- **Modify thresholds for historic review.** This measure is already discussed at FEIS page 3.312 bullet 2 but warrants further discussion here. Analysis above highlights the gap in protection to historic resources in instances where development does not undergo SEPA review. This scenario could occur in numerous urban villages where land would be rezoned from Single-family 5000 to RSL (though alteration of Single-family zoned properties also could occur with no zone change). The City could modify its threshold review practices to require Landmark review for demolition or substantial alteration of any structure 50 years of age or older regardless of the size or number of housing units in the proposed new development.
- **Retain zoning incentives for Transfer of Development Rights in the First Hill Urban Center.** The First Hill-Capitol Hill urban center is rich in historic resources and as an urban center has higher thresholds for SEPA review. The City could maintain an incentive for preservation of Landmark sites in First Hill by retaining a zoning incentive for Transfer of Development Potential for Landmark preservation as part of the new MHA zoning in the area.
- **Select MHA alternative with relatively fewer Landmarks and NRHP Determined Eligible resources in the (M1) or (M2) tier zoning changes.** Analysis in this addendum shows that the alternatives have differing degrees of indirect impact to Landmark and NRHP Determined Eligible resources. Resources are impacted to a lesser degree under Alternative 2 and the Preferred Alternative, while Alternative 3 has greater impacts. Selection of the Preferred Alternative, or a modified version of the Preferred Alternative that applies fewer (M1) and (M2) tier capacity increases on and in the vicinity of Landmark and NRHP Determined Eligible resources would mitigate impacts to historic resources.

Significant Unavoidable Adverse Impacts

FEIS Section 3.5 and this addendum conclude that the MHA program under the action alternatives could result in greater adverse impacts to historic resources compared to the No Action alternative. Adverse impacts to historic resources are also expected under No Action. Due to the programmatic nature of the proposal, and the uncertainty of the form and character of future development over a long time period it is not possible to pinpoint the exact degree of impact, nor anticipate with certainty the sites where impacts may occur. Furthermore, due to the layered nature of historic information and degrees of formality to definition of historic resources, there is not a single barometer for what constitutes impact to historic resources in the study area. Because of these factors, impacts and significant impacts must be considered potential, and may be summarized as follows.

Potential significant impacts are found for several urban villages under each Action Alternative where growth rates would be at least 50% greater than under the No Action alternative. There is potential for adverse impact when redevelopment could occur at an incrementally greater scale under an action alternative adjacent to a Landmark or a Landmark's setting, although for the reasons described at page sixteen above this impact is not considered to be significant. Adverse impacts from incrementally larger scale development could occur under action alternatives on sites that have the potential to be Landmarks including some NRHP Determined Eligible resources. The degree of potential impact is greater if the redevelopment is not subject to SEPA or DON historic review. In the case of potential Landmarks such SEPA exempt development could cause potential significant impacts, as noted in the FEIS at page 3.305. Where incrementally greater scale of development would be allowed in a newly designated National Register Historic District under an action alternative, a decrease to the cohesiveness of historic characteristics of the district could erode the characteristics that qualified the area for historic district status.

The nature of adverse impacts under action alternatives are fully described in Section 3.5 and throughout this addendum. This addendum provides additional analysis about the potential impacts including more detailed information on the specific locations where significant impacts could occur, and a specific analysis of SEPA exempt redevelopment scenarios that would be more likely to cause significant impact.

The FEIS concluded that all significant impacts to historic resources are avoidable, and with expanded information in this appendix it is still concluded that all significant impacts are avoidable. A combination of mitigation measures would be required to fully avoid the significant impacts. FEIS Section 3.5.3 identifies the mitigation strategies that could be used. This addendum provides expanded description of mitigation, identifying the most effective mitigation measures that could be used to mitigate impacts to historic resources below a significant level. The measures expanded upon in this addendum are emphasized as the measures most needed to mitigate impacts below a significant level based on the more granular information provided here.