

# SEPA ENVIRONMENTAL CHECKLIST

## UPDATED 2014

### ***Purpose of checklist:***

Governmental agencies use this checklist to help determine whether the environmental impacts of your proposal are significant. This information is also helpful to determine if available avoidance, minimization or compensatory mitigation measures will address the probable significant impacts or if an environmental impact statement will be prepared to further analyze the proposal.

## **A. Background**

1. Name of proposed project, if applicable:

Townhouse Reforms

2. Name of applicant:

City of Seattle

3. Address and phone number of applicant and contact person:

Office of Planning and Community Development  
600 4<sup>th</sup> Avenue, 5<sup>th</sup> Floor  
Seattle, Washington 98104  
Contact: Brennon Staley, Strategic Advisor, (206) 684-4625

4. Date checklist prepared:

October 21, 2021

5. Agency requesting checklist:

City of Seattle, Office of Planning and Community Development

6. Proposed timing or schedule (including phasing, if applicable):

Approval by City Council and Mayor in the first half of 2022.

7. Do you have any plans for future additions, expansion, or further activity related to or connected with this proposal? If yes, explain.

No

8. List any environmental information you know about that has been prepared, or will be prepared, directly related to this proposal.

A Townhouse Reforms GIS analysis was prepared in April of 2020 to understand the area and number of parcels in multifamily zones that are potentially redevelopable, located on a corner lot, located in a historic district or environmentally critical area, or containing a historic landmark.

A SEPA checklist and determination was published on December 2, 2019 for amendments to the Land Use Code to modify standards related to the access easement standards and driveway standards. Legislation to implement this proposal may also include those amendments as well.

9. Do you know whether applications are pending for governmental approvals of other proposals directly affecting the property covered by your proposal? If yes, explain.

A number of pending development proposals are located in zones affected by this proposal.

10. List any government approvals or permits that will be needed for your proposal, if known.

Approval of an ordinance by Seattle City Council.

11. Give brief, complete description of your proposal, including the proposed uses and the size of the project and site. There are several questions later in this checklist that ask you to describe certain aspects of your proposal. You do not need to repeat those answers on this page. (Lead agencies may modify this form to include additional specific information on project description.)

This is a non-project proposal. This proposal would implement multiple changes intended to support the development of townhouse and rowhouses. These changes would:

Update the density limit in Lowrise 1 zones to reduce unnecessary permit process

The proposal would amend the density limit standard for Lowrise 1 zones to:

1. Increase the existing density limit for certain rowhouses and townhouses from 1 unit per 1,300 square feet of lot to 1 unit per 1,150 square feet.
2. Apply the density limit to rowhouse development on interior lots of 3,000 square feet or greater, which are currently exempt from the density limit.

This change would allow new development to achieve densities that are similar to what some developments already constructed or under permitting are achieving without subdividing the property to create one lot with rowhouses and one lot with townhouse.

Update bike parking requirements to address the unique conditions of townhouse and rowhouses

The proposal would amend bike parking requirements as follows:

1. remove the short-term bike parking requirement for townhouses and rowhouses
2. allow bike parking in a dwelling unit of a townhouse or rowhouse development
3. allow bike lockers and sheds in certain setbacks and separations
4. clarify that enclosed bicycle parking does not count toward floor area if it is in a freestanding structure used exclusively for bike parking
5. clarify that weather protection and freestanding structures used exclusively for bike parking don't count in measuring building length and width.

Minor modifications and clarifications

The proposal would implement the following additional modifications and clarifications:

1. Exclude from floor area calculation surface parking in single-family and multifamily zones that is only covered by:

- projections of up to 4 feet that do not enclose floor area; or
  - projections of up to 3 feet that enclose floor area and are located at least 8 feet above finished grade.
2. Modify an existing provision that allows parking off an alley within 7 feet of a side property line so that parking can occur within 26 feet of the alley property line rather than 25 feet.
  3. Change the minimum size of parking spaces in the individual garage of a townhouse from large to medium.
  4. Clarify how development standards such as density limits apply to lots with multiple development types.

12. Location of the proposal. Give sufficient information for a person to understand the precise location of your proposed project, including a street address, if any, and section, township, and range, if known. If a proposal would occur over a range of area, provide the range or boundaries of the site(s). Provide a legal description, site plan, vicinity map, and topographic map, if reasonably available. While you should submit any plans required by the agency, you are not required to duplicate maps or detailed plans submitted with any permit applications related to this checklist.

This ordinance would affect single-family and multifamily zones throughout the City. It would also affect townhouse and rowhouse development in other zones as well as development that is subject to structure width requirements or has freestanding structures used solely for bike parking.

## B. ENVIRONMENTAL ELEMENTS

### 1. Earth

- a. General description of the site  
(circle one): Flat, rolling, hilly, steep slopes, mountainous,  
other \_\_\_\_\_

The affected area contains a diversity of site conditions consistent with urbanized areas.

- b. What is the steepest slope on the site (approximate percent slope)?

The affected area contains a diversity of slopes from flat areas to steep slopes.

- c. What general types of soils are found on the site (for example, clay, sand, gravel, peat, muck)? If you know the classification of agricultural soils, specify them and note any agricultural land of long-term commercial significance and whether the proposal results in removing any of these soils.

The affected area contains a diversity of soils and fills consistent with urbanized areas.

- d. Are there surface indications or history of unstable soils in the immediate vicinity? If so, describe.

The area includes peat-settlement prone areas and liquefaction-prone areas.

- e. Describe the purpose, type, total area, and approximate quantities and total affected area of any filling, excavation, and grading proposed. Indicate source of fill.

This is a non-project action. No filling, excavation, or grading is proposed.

- f. Could erosion occur as a result of clearing, construction, or use? If so, generally describe.

This is a non-project action. No clearing, construction, or change of use is proposed. Erosion could occur indirectly as a result of future development if the proposal incrementally encourages or discourages development in the affected area.

- g. About what percent of the site will be covered with impervious surfaces after project construction (for example, asphalt or buildings)?

This is a non-project action. No change of impervious surface is proposed. Changes in impervious surface could occur indirectly as a result of future development if the proposal incrementally encourages or discourages development in the affected area.

- h. Proposed measures to reduce or control erosion, or other impacts to the earth, if any:

None. Compliance with existing City ordinances to reduce or control erosion is required for development in Seattle.

## 2. Air

- a. What types of emissions to the air would result from the proposal during construction, operation, and maintenance when the project is completed? If any, generally describe and give approximate quantities if known.

This is a non-project action. No emissions will occur as a direct result of this proposal. Minor changes in emissions could occur indirectly as a result of future development if the proposal incrementally encourages or discourages development in the affected area.

- b. Are there any off-site sources of emissions or odor that may affect your proposal? If so, generally describe.

The area contains a variety of emission and odors consistent with urbanized areas.

- c. Proposed measures to reduce or control emissions or other impacts to air, if any:

None. Compliance with existing city ordinances to reduce or control emissions and other impacts to air is required for development in Seattle.

## 3. Water

- a. Surface Water:

- 1) Is there any surface water body on or in the immediate vicinity of the site (including year-round and seasonal streams, saltwater, lakes, ponds, wetlands)? If yes, describe type and provide names. If appropriate, state what stream or river it flows into.

This area contains a variety of surface water bodies including but not limited to Puget Sound, Duwamish River, Bitter Lake, and Haller Lake.

- 2) Will the project require any work over, in, or adjacent to (within 200 feet) the described waters? If yes, please describe and attach available plans.

This is a non-project action. No work over, in, or adjacent to the described waters is proposed.

- 3) Estimate the amount of fill and dredge material that would be placed in or removed from surface water or wetlands and indicate the area of the site that would be affected. Indicate the source of fill material.

This is a non-project action. No fill or dredging in or from wetlands or surface water will result from the proposal.

- 4) Will the proposal require surface water withdrawals or diversions? Give general description, purpose, and approximate quantities if known.

This is a non-project action. No surface water withdrawals or diversions will result from this proposal.

- 5) Does the proposal lie within a 100-year floodplain? If so, note location on the site plan.

This is a non-project action. This affected area includes 100-year floodplains.

- 6) Does the proposal involve any discharges of waste materials to surface waters? If so, describe the type of waste and anticipated volume of discharge.

This is a non-project action. No discharges of waste materials to surface waters will result from this proposal.

b. Ground Water:

- 1) Will groundwater be withdrawn from a well for drinking water or other purposes? If so, give a general description of the well, proposed uses and approximate quantities withdrawn from the well. Will water be discharged to groundwater? Give general description, purpose, and approximate quantities if known.

This is a non-project action. The area includes land that contains wells. No withdrawal of groundwater will result from this proposal for drinking water or other purposes

- 2) Describe waste material that will be discharged into the ground from septic tanks or other sources, if any (for example: Domestic sewage; industrial, containing the following chemicals. . . ; agricultural; etc.). Describe the general size of the system, the number of such systems, the number of houses to be served (if applicable), or the number of animals or humans the system(s) are expected to serve.

This is a non-project action. No waste materials are proposed to be discharged.

c. Water runoff (including stormwater):

- 1) Describe the source of runoff (including storm water) and method of collection and disposal, if any (include quantities, if known). Where will this water flow? Will this water flow into other waters? If so, describe.

This is a non-project action. No runoff will result from this proposal.

- 2) Could waste materials enter ground or surface waters? If so, generally describe.

This is a non-project action. This proposal will not result in waste materials entering ground or surface waters.

- 3) Does the proposal alter or otherwise affect drainage patterns in the vicinity of the site? If so, describe.

This is a non-project action. This proposal will not affect drainage patterns.

- d. Proposed measures to reduce or control surface, ground, and runoff water, and drainage pattern impacts, if any:

None. Compliance with existing city ordinances to reduce or control stormwater and wastewater is required for development in Seattle.

#### 4. Plants

- a. Check the types of vegetation found on the site:

- ☐ deciduous tree: alder, maple, aspen, other  
☐ evergreen tree: fir, cedar, pine, other  
☐ shrubs  
☐ grass  
☐ pasture  
☐ crop or grain  
☐ Orchards, vineyards, or other permanent crops.  
☐ wet soil plants: cattail, buttercup, bullrush, skunk cabbage, other  
☐ water plants: water lily, eelgrass, milfoil, other  
☐ other types of vegetation

This SEPA assumption is erroneous indicating that an additional dwelling\* rowhouse/ townhouse (within a property of 5000 or 6000 sq ft) will "not result in direct removal or alteration of vegetation."

The code for lowrise residential allows removal of protected tree groves and exceptional trees when it is determined that the maximum development potential in FAR cannot be achieved if the protected tree(s) are retained.

The affected area contains a diversity of plants consistent with urbanized areas.

- b. What kind and amount of vegetation will be removed or altered?

Thus, with townhouses not being stacked vertically, the FAR is distributed horizontally on the properties... reducing open space for parking, reducing on-grade exterior amenity area, reducing planting area, and justifying clearing development with LR zones without front yard space to compensate for canopy cover needed to combat climate change.

This is a non-project action. This proposal will not result in the direct removal or alteration of vegetation. Changes in vegetation could occur indirectly as a result of future development if the proposal incrementally encourages or discourages development in the affected area.

- c. List threatened and endangered species known to be on or near the site.

No threatened or endangered plant species are known to be on or near the site.

City's tree loss data for LR-zones is overdue.

- d. Proposed landscaping, use of native plants, or other measures to preserve or enhance vegetation on the site, if any: None.

- e. List all noxious weeds and invasive species known to be on or near the site.

The affected area contains a diversity of invasive plants consistent with urbanized areas. These plants include but are not limited to common urban invasives such as ivy, blackberry, and bindweed.

#### 5. Animals

- a. List any birds and other animals which have been observed on or near the site or are known to be on or near the site. Examples include:

birds: hawk, heron, eagle, songbirds, other:

mammals: deer, bear, elk, beaver, other:

fish: bass, salmon, trout, herring, shellfish, other \_\_\_\_\_

The affected area contains a diversity of animals consistent with urbanized areas including a diversity of birds, mammals, fish, and livestock. These animals include but are not limited to hawk, heron, eagle, songbirds, and salmon.

- b. List any threatened and endangered species known to be on or near the site.

A variety of threatened and endangered species including salmon and various birds are known to be on or near the site.

- c. Is the site part of a migration route? If so, explain.

The area includes migration routes for a variety of species including but not limited to salmon and various birds.

- d. Proposed measures to preserve or enhance wildlife, if any: None.

- e. List any invasive animal species known to be on or near the site.

The affected area contains a diversity of invasive animal species consistent with urbanized areas.

## 6. Energy and natural resources

- a. What kinds of energy (electric, natural gas, oil, wood stove, solar) will be used to meet the completed project's energy needs? Describe whether it will be used for heating, manufacturing, etc.

This is a non-project action. This proposal will not directly result in additional energy needs.

- b. Would your project affect the potential use of solar energy by adjacent properties? If so, generally describe.

This is a non-project action. This proposal will not directly affect the use of solar energy on adjacent properties. The proposal might result in indirect changes to solar access to the extent that it encourages or discourages development within urban areas.

- c. What kinds of energy conservation features are included in the plans of this proposal? List other proposed measures to reduce or control energy impacts, if any:

None. Compliance with existing city ordinances for energy is required for development in Seattle.

## 7. Environmental health

- a. Are there any environmental health hazards, including exposure to toxic chemicals, risk of fire and explosion, spill, or hazardous waste, that could occur as a result of this proposal? If so, describe.

- 1) Describe any known or possible contamination at the site from present or past uses.

The affected area contains a diversity of conditions consistent with urbanized areas.

- 2) Describe existing hazardous chemicals/conditions that might affect project development and design. This includes underground hazardous liquid and gas transmission pipelines located within the project area and in the vicinity.

The affected area contains a diversity of conditions consistent with urbanized areas. These include natural gas transmission pipelines.

- 3) Describe any toxic or hazardous chemicals that might be stored, used, or produced during the project's development or construction, or at any time during the operating life of the project.

This is a non-project action. This proposal will not result in the storage, use, or production of toxic or hazardous chemicals.

- 4) Describe special emergency services that might be required.

This is a non-project action. This proposal will not directly result in additional need for special emergency services.

- 5) Proposed measures to reduce or control environmental health hazards, if any: None.

### b. Noise

- 1) What types of noise exist in the area which may affect your project (for example: traffic, equipment, operation, other)?

The affected area contains a diversity of noise consistent with urbanized areas.

- 2) What types and levels of noise would be created by or associated with the project on a short-term or a long-term basis (for example: traffic, construction, operation, other)? Indicate what hours noise would come from the site.

This is a non-project action. This proposal will not directly result in additional noise.

- 3) Proposed measures to reduce or control noise impacts, if any:

None. Compliance with existing city ordinances for noise is required for development in Seattle.

## 8. Land and shoreline use

- a. What is the current use of the site and adjacent properties? Will the proposal affect current land uses on nearby or adjacent properties? If so, describe.

The affected area contains a diversity of land uses consistent with urbanized areas including but not limited to housing, office, and retail uses. The proposal will not directly affect land uses.

- b. Has the project site been used as working farmlands or working forest lands? If so, describe. How much agricultural or forest land of long-term commercial significance will be converted to other uses as a result of the proposal, if any? If resource lands have not been designated, how many acres in farmland or forest land tax status will be converted to nonfarm or nonforest use?

The site does not contain working farmlands or forest lands, although it does contain small-scale agricultural uses and natural areas. The proposal would not directly convert any farm or forest land.

- 1) Will the proposal affect or be affected by surrounding working farm or forest land normal business operations, such as oversize equipment access, the application of pesticides, tilling, and harvesting? If so, how:

This is a non-project action. The proposal will not directly alter farm or forest land.

- c. Describe any structures on the site.

The affected area contains a diversity of structures consistent with urbanized areas including attached and detached single-family homes.

- d. Will any structures be demolished? If so, what?

This is a non-project action. This proposal will not directly result in demolition of structures. Demolitions could occur indirectly as a result of future development if the proposal incrementally encourages or discourages development in the affected area.

- e. What is the current zoning classification of the site?

The affected area contains a diversity of zones. These include single-family, multifamily, and commercial zones.

- f. What is the current comprehensive plan designation of the site?

The affected area contains a diversity of comprehensive plan designations. These include urban center and village designations in Seattle as well as areas outside of those designations.

- g. If applicable, what is the current shoreline master program designation of the site?

The affected area contains a diversity of shoreline master program designations.

- h. Has any part of the site been classified as a critical area by the city or county? If so, specify.

The affected area contains a diversity of critical area designations including but not limited to wetlands, riparian areas, and steep slopes.

- i. Approximately how many people would reside or work in the completed project?

This is a non-project action. This proposal will not directly result in buildings in which people would reside or work. This proposal could indirectly result in new buildings if the proposal incrementally encourages or discourages development in the affected area.

- j. Approximately how many people would the completed project displace?

This is a non-project action. No displacement will occur as a direct result of the project. This proposal could indirectly result in displacement if the proposal incrementally encourages or discourages development in the affected area.

- k. Proposed measures to avoid or reduce displacement impacts, if any: None.

- L. Proposed measures to ensure the proposal is compatible with existing and projected land uses and plans, if any: None.

- m. Proposed measures to ensure the proposal is compatible with nearby agricultural and forest lands of long-term commercial significance, if any: None.

## 9. Housing

- a. Approximately how many units would be provided, if any? Indicate whether high, middle, or low-income housing.

This is a non-project action. No housing is proposed to be created as part of this project. This proposal could indirectly result in new housing if the proposal incrementally encourages or discourages development in the affected area.

- b. Approximately how many units, if any, would be eliminated? Indicate whether high, middle, or low-income housing.

This is a non-project action. No housing is proposed to be eliminated as part of this project. This proposal could indirectly result in the elimination of housing if the proposal incrementally encourages or discourages development in the affected area.

- c. Proposed measures to reduce or control housing impacts, if any:

None. Compliance with existing city ordinances on housing and tenant relocation assistance is required.

## 10. Aesthetics

- a. What is the tallest height of any proposed structure(s), not including antennas; what is the principal exterior building material(s) proposed?

This is a non-project action. This proposal will not directly result in new buildings.

- b. What views in the immediate vicinity would be altered or obstructed?

This is a non-project action. No views would be directly altered or obstructed by this project.

- c. Proposed measures to reduce or control aesthetic impacts, if any: None.

#### **11. Light and glare**

- a. What type of light or glare will the proposal produce? What time of day would it mainly occur?

This is a non-project action. This proposal will not directly result in additional light or glare.

- b. Could light or glare from the finished project be a safety hazard or interfere with views?

This is a non-project action. This proposal will not directly result in additional light or glare.

- c. What existing off-site sources of light or glare may affect your proposal?

The affected area contains a diversity of light and glare sources consistent with urbanized areas.

- d. Proposed measures to reduce or control light and glare impacts, if any: None.

#### **12. Recreation**

- a. What designated and informal recreational opportunities are in the immediate vicinity?

The affected area has a diversity of recreational opportunities in the immediate vicinity consistent with urbanized areas including formal parks and natural areas.

- b. Would the proposed project displace any existing recreational uses? If so, describe.

This is a non-project action. This proposal will not directly displace any recreational uses.

- c. Proposed measures to reduce or control impacts on recreation, including recreation opportunities to be provided by the project or applicant, if any: None.

#### **13. Historic and cultural preservation**

- a. Are there any buildings, structures, or sites, located on or near the site that are over 45 years old listed in or eligible for listing in national, state, or local preservation registers located on or near the site? If so, specifically describe.

The affected area contains a diversity of historic sites and buildings including locally and federally designated sites.

- b. Are there any landmarks, features, or other evidence of Indian or historic use or occupation? This may include human burials or old cemeteries. Are there any material evidence, artifacts, or areas of cultural importance on or near the site? Please list any professional studies conducted at the site to identify such resources.

The affected area contains a diversity of locations with evidence of Indian or historic use or occupation. The area includes locations of historic settlement by Indians and European settlers.

- c. Describe the methods used to assess the potential impacts to cultural and historic resources on or near the project site. Examples include consultation with tribes and the department of archeology and historic preservation, archaeological surveys, historic maps, GIS data, etc.

None. This is a non-project action.

- d. Proposed measures to avoid, minimize, or compensate for loss, changes to, and disturbance to resources. Please include plans for the above and any permits that may be required.

None. Compliance with existing city ordinances for historic preservation is required for development in Seattle.

#### 14. Transportation

- a. Identify public streets and highways serving the site or affected geographic area and describe proposed access to the existing street system. Show on site plans, if any.

The affected area contains a diversity of streets, highways, and parking areas consistent with urbanized areas.

- b. Is the site or affected geographic area currently served by public transit? If so, generally describe. If not, what is the approximate distance to the nearest transit stop?

Some of the affected area is served by public transit. Distances to transit stops vary substantially.

- c. How many additional parking spaces would the completed project or non-project proposal have? How many would the project or proposal eliminate?

This is a non-project action. This proposal will not directly result in the creation or elimination of parking spaces. Changes in the number of parking spaces could occur indirectly as a result of future development if the proposal incrementally encourages or discourages development in the affected area.

- d. Will the proposal require any new or improvements to existing roads, streets, pedestrian, bicycle or state transportation facilities, not including driveways? If so, generally describe (indicate whether public or private).

This is a non-project action. The proposal will not result in direct improvements to transportation facilities.

- e. Will the project or proposal use (or occur in the immediate vicinity of) water, rail, or air transportation? If so, generally describe.

The affected area includes rail transportation as well as water ways that could support water transportation.

- f. How many vehicular trips per day would be generated by the completed project or proposal? If known, indicate when peak volumes would occur and what percentage of the volume would be trucks (such as commercial and nonpassenger vehicles). What data or transportation models were used to make these estimates?

This is a non-project action. This proposal will not directly result in additional vehicular trips. Changes in the number of vehicular trips could occur indirectly as a result of future development if the proposal incrementally encourages or discourages development in the affected area.

- g. Will the proposal interfere with, affect or be affected by the movement of agricultural and forest products on roads or streets in the area? If so, generally describe.

This is a non-project action. This proposal will not directly affect the movement of agricultural and forest projects.

- h. Proposed measures to reduce or control transportation impacts, if any: None.

#### 15. Public services

- a. Would the project result in an increased need for public services (for example: fire protection, police protection, public transit, health care, schools, other)? If so, generally describe.

This is a non-project action. This proposal will not directly result in increased need for public services.

- b. Proposed measures to reduce or control direct impacts on public services, if any: None.

#### 16. Utilities

- a. Circle utilities currently available at the site:  
electricity, natural gas, water, refuse service, telephone, sanitary sewer, septic system,  
other \_\_\_\_\_

The affected area contains a diversity of utilities consistent with urbanized areas. These include electricity, natural gas, water, refuse service, telephone, sanitary sewer, septic system, and other utilities.

- b. Describe the utilities that are proposed for the project, the utility providing the service, and the general construction activities on the site or in the immediate vicinity which might be needed.

This is a non-project action. No utilities are proposed for this project.

## C. Signature

The above answers are true and complete to the best of my knowledge. I understand that the lead agency is relying on them to make its decision.

Signature:	on file
Name of signee:	Brennon Staley
Position and Agency/Organization:	Strategic Advisor City of Seattle Office of Planning & Community Development
Date Submitted:	November 8, 2021

## **D. Supplemental sheet for nonproject actions**

### **1. How would the proposal be likely to increase discharge to water; emissions to air; production, storage, or release of toxic or hazardous substances; or production of noise?**

Overall, this non-project proposal would not result in any direct impacts to water, air, toxic or hazardous substances, or noise because it does not directly propose development. In terms of its effects upon future possible development, the proposed changes to development standards could slightly modify the amount, density, and design of future development. The increment of additional future development that could occur could generate minor adverse impacts commonly associated with development in urban areas, such as emissions from automobile trips and heating in new buildings, and incidental contributions to environmental noise and stormwater runoff.

The proposed changes could result in incremental increases in the amount and duration of construction activity, but these would make only a minor difference in the total potential for emissions to air, noise and release of toxic or hazardous substances. Any development or redevelopment will have to comply with City regulations for management of stormwater runoff and other construction practices and requirements.

Any incremental increase in greenhouse gas emissions resulting from additional development could be offset at least partially by reductions in commuting over future buildings' lifetimes as more residents and employees would be able to live and work in Seattle. It is not possible to reliably quantify these offsetting factors for comparative purposes, but they would factor into estimations of the net change in greenhouse gas emissions resulting from this proposal.

Proposed measures to avoid or reduce such increases are: None proposed.

### **2. How would the proposal be likely to affect plants, animals, fish, or marine life?**

There are vegetated portions of properties present within the affected areas and various wildlife habituated to urban areas, such as squirrels and birds, are present. The affected areas also include property adjacent to Puget Sound, Lake Washington, Bitter Lake, Haller Lake, and the Duwamish River, which provide habitat value for birds, fish, and other marine life.

This non-project proposal would result in no direct impacts to plants, animals, fish, or marine life because it does not directly propose development. The proposal could indirectly affect the potential for impacts to plants, animals, fish, or marine life because future development affected by the proposal might slightly affect these habitats. The nature of such adverse impacts from different levels of future development could relate to factors such as adding slightly to traffic related deposits of pollutants on local streets or theoretically leading to higher stormwater flows ultimately released from the affected properties. The proposal could also result in minor changes to the extent of weather protection, free-standing bike facilities, or building projects which could impact stormwater flows. However, the actual potential for these theorized differences could be affected by the nature of drainage controls and similar features on development sites, which could essentially neutralize or minimize the potential for greater adverse impacts. No significant adverse impacts to plants, animals, fish, or marine life are likely as a result of this proposal.

Proposed measures to protect or conserve plants, animals, fish, or marine life are: None proposed.

### **3. How would the proposal be likely to deplete energy or natural resources?**

The proposed changes would result in no direct negative impacts to energy or natural resources because it does not directly propose development. Changes in the amount or density of future development could result in an incremental increase in the number or density of new housing units that, in some cases, could result in incrementally higher energy use for a particular project. An increase in the number of units might also result in smaller units due to the existing maximum floor area limits, which would reduce energy and natural resource use per unit. The differential levels of impacts given potential increments in future development are not likely to be significant. New buildings will continue to be required to comply with the Seattle Energy Code and other standards for energy efficiency. Additionally, to the extent that additional development capacity results in an increase in the number of housing units in Seattle, the proposal may in certain cases reduce demand for energy and natural resources by increasing residential and commercial density in an area with frequent transit service and a mix of land uses, increasing the likelihood that people will walk and use transit for work and other daily trips.

Proposed measures to protect or conserve energy and natural resources are: None proposed.

**4. How would the proposal be likely to use or affect environmentally sensitive areas or areas designated (or eligible or under study) for governmental protection, such as parks, wilderness, wild and scenic rivers, threatened or endangered species habitat, historic or cultural sites, wetlands, floodplains, or prime farmlands?**

The proposed changes would result in no direct negative impacts to environmentally sensitive areas or areas designated for government protection because it does not directly propose development. The proposed zoning changes would not affect the types of construction or uses allowed and would not increase the maximum size of future development. There are no wilderness areas, wild and scenic rivers, threatened or endangered species habitat, or prime farmlands in the area where the proposal would apply. However, it is noted that species such as bald eagles and salmon are known to inhabit the general vicinities near the affected area, which adds a degree of interest in preserving habitat and water quality from degradation.

The increment of additional future development that could occur could generate minor adverse impacts commonly associated with development in urban areas, such as incidental contributions to environmental noise and stormwater runoff commonly associated with urban development.

There are 90 parcels, representing 41 acres, zoned multifamily in historic districts in LR1 zones. Additionally, there are 83 parcels, representing 100 acres, zoned multifamily that contain landmark building including 11 parcels, representing 9 acres, in LR1 zones. There are also likely to be other buildings that might be eligible for designation but have not yet been designated. This proposal is not likely to generate significant adverse impact on historic landmarks as it would not modify existing protections for historic landmarks. Existing landmarks would continue to be subject to regulations limiting modification or demolition.

This proposal is not likely to generate significant adverse impacts on sites containing archaeological and cultural resources. Such resources' locations are not known but might be present in portions of this area in or near current or historic shoreline areas. The proposal would not modify existing protections for these resources and is not likely to significantly increase the number of sites that would be redeveloped.

Future possible development projects in these areas would continue to be subject to the requirements of the Shoreline Master Program, State Environmental Policy Act (SEPA), Historic Preservation Policy, and other state laws for potential archaeologically significant sites, as applicable.

Proposed measures to protect such resources or to avoid or reduce impacts are: None proposed.

5. **How would the proposal be likely to affect land and shoreline use, including whether it would allow or encourage land or shoreline uses incompatible with existing plans?**

The proposal would result in no direct impacts to land and shoreline use as it is a non-project action. Furthermore, the proposal would not modify the types of uses that are allowed in the affected areas. The proposal could result in minor changes in the type and amount of residential development that occurs, particularly in LR1 zones, as follows:

1. The proposal could increase the number of units in future development where reduced permit process requirements to achieve a higher density encourages development at higher densities.
2. The proposal could decrease the number of units in future development where it encourages the development of townhouses and rowhouses rather than apartments.
3. The proposal could increase the amount of rowhouse and townhouse development slightly overall if reduced permit process and requirements make development more feasible.
4. The proposal could decrease the amount of rowhouse and townhouse slightly overall if removing the density limit exemption for rowhouse development on interior lots of 3,000 square feet or greater makes development less feasible.

Townhouse and rowhouse development occurs most frequently in LR1 zones, but also occurs in other Lowrise zones and infrequently in other multifamily and neighborhood commercial zones. Currently, there are 3,890 acres zoned Lowrise including 1,010 acres zoned LR1. Lowrise zones have a potential development capacity of about 55,400 units including 19,200 units in LR1 zones. About 90% of all LR1 zoned land, or 908 acres, is specifically located on interior lots that could be affected by proposed changes in the density limits regulations.

The proposal would modify the existing density limit for townhouse developments from 1 unit per 1,300 square feet to 1 unit per 1,150 square feet, but would also apply the density limits to rowhouse development on interior lots of 3,000 square feet or greater. Under existing rules, projects on interior lots may already be developed more densely than the proposed density limit. This outcome can be achieved by building apartments, rowhouses, or a mixture of rowhouses and townhouse. Many developments currently choose to subdivide their property parallel to the street and develop townhouses on the back lot and rowhouses on the front lot. Because rowhouses on lots 3,000 square feet in size or greater are exempt from density limits, subdividing allows more units to be built on most lots. This approach has allowed development of townhouse and rowhouses at a density that is lower than 1 unit per 1,300 sq ft. Apartments may be developed at substantially greater densities since they are exempted from density limits entirely, although buildings with 4 units or more as subject to a family-sized unit requirement. Even with this limit, apartments could be developed at densities of 1 unit per 500 square feet. An informal review of recent development projects shows that recent projects containing townhouse and/or rowhouse are occurring with densities as low as 1 unit per 1,190 square feet on interior lots and 1 unit per 1,075 square feet on corner lots, but also with densities higher than 1 unit per 2,000 square feet.

Due to the complexity of site configurations and development economics for individual projects, it is not appropriate to conjecture as to the average level of density that is likely to occur across future projects or the extent to which it will be less than or greater than past projects. However, these changes are likely to be minor.

### **Housing**

This proposal is intended to implement new regulations that encourage the production of more townhouses and rowhouses, particularly smaller, less expensive units in new townhouse and rowhouse development.

Analysis contained in the Housing Appendix of the Comprehensive Plan demonstrates that there is a substantial unmet and growing need for market-rate and affordable housing in the City.

Adverse impacts on existing housing could occur if the proposal results in an increase in demolition of existing buildings in order to develop new market-rate buildings. Overall, the proposal is not likely to significantly increase demolition since it is only resulting in minor changes in development standards. Moreover, developments affected by the proposal will be residential developments and most would be required to contribute to affordable housing through Mandatory Housing Affordability requirements, which would offset or partially offset the impact of any housing units demolished through redevelopment.

To the extent that the proposed changes to the density limit encourage new development that is denser, the resulting units would also be smaller and less expensive given the existing floor area limit. This change would help to produce housing that is affordable to a wider range of people.

#### **Use and Development Patterns**

This action is not likely to result in significant changes to use and development patterns as the proposal would not change the uses and types of developments allowed. The proposal could slightly encourage the development of townhouses and rowhouses in comparison to apartments or detached homes.

#### **Height, Bulk, and Scale**

The proposal would not modify existing regulations regarding height, bulk, and scale. However, minor impacts consistent with infill development could occur if the proposal encourages additional development. The proposal could result in minor impact to bulk if they encourage bike lockers or sheds outside of buildings or in setbacks and separations.

#### **Public View Protection, Shadows on Open Space, Light and Glare**

The proposal is not likely to result in significant changes to views, shadows, light, and glare as it would not modify existing regulations regarding height, bulk, and scale. Minor indirect impacts could occur if the proposal encourages additional development, which could block some existing views, create new views, and create shadows, light, and glare consistent with infill development. The proposal could also result in minor impact to bulk if they encourage additional weather protection, freestanding bike facilities, or building projections.

Proposed measures to avoid or reduce shoreline and land use impacts are: production of new affordable housing in potential future buildings through Mandatory Housing Affordability requirements.

### **6. How would the proposal be likely to increase demands on transportation or public services and utilities?**

Overall, this proposal is not likely to result in significant adverse impacts in the form of increased demands on transportation or public services and utilities.

Significant analysis of transportation, public services, and utilities has been conducted as part of the 2035 Comprehensive Plan Update and the implementation of Mandatory Housing Affordability requirements. This action is not expected to significantly change the range of potential outcomes considered as part of these analyses.

Long-term bike and motor vehicle parking requirements would not be changed. However, the proposal could result in minor changes to transportation patterns as follows:

1. The proposal could decrease travel by bicycle if the removal of short-term bike parking makes it marginally less convenient for individuals to visit people in future townhouses by bicycle.
2. The proposal could increase travel by bicycle if it supports types of bike parking that are more secure or easier to use such as bike sheds, bike lockers, or bike parking internal to a unit.
3. The proposal could increase travel by bicycle if it supports more housing in biking distance from jobs, shops, and services.
4. The proposal could encourage the provision of additional car parking on-site by allowing it under eaves and minor overhangs without counting toward floor area, which might free up on-street parking spaces or encourage more travel by automobile.
5. The proposal could encourage the provision of additional car parking on-site if the reduced size of parking spaces makes it incrementally easier to accommodate parking on sites.
6. The proposal could discourage the use of on-site car parking if it makes it incrementally more difficult to park large vehicles in their garage.
7. The proposal could encourage the provision of additional car parking on-site if it makes it incrementally easier to accommodate additional units on a site and the additional units include parking.

The proposal could also result in minor impacts to transportation, public services, and utilities if it slightly modifies the amount or density of future development.

Due to the complexity of site configurations and the many factors affecting travel patterns, it is not appropriate to conjecture as to the exact increase or decrease that is likely to occur. However, these changes are likely to be minor.

The City's pedestrian and bicycle network is expected to provide enough capacity for the growth projected under past actions. Moreover, the City has identified plans to improve the pedestrian and bicycle network through its Pedestrian Master Plan and Bicycle Master Plan.

There are currently some locations in the affected area where on-street parking demand exceeds parking supply. This proposal could increase the competition for on-street parking by encouraging incremental increase in townhouse and rowhouse construction. It could also slightly reduce competition by making it easier to accommodate car parking on-site. While there may be minor incremental changes in the availability short-term on-street parking shortages as individual developments are completed, it is expected that over the long term, parking supply and demand would reach a new equilibrium as drivers shift to other modes or to using off-street parking facilities in response to the City's ongoing on-street parking management program. Therefore, the parking impacts are not considered significant.

Reviews by Seattle Public Utilities and Seattle City Light staff of past citywide actions indicate that the water, sewer, drainage, and electrical utility systems are likely to be adequate to serve future demand levels. While some site-specific improvements may be needed, these improvements will be identified at the time of the future development. New development projects in this area could be required to perform analysis of development-related impacts on utility system infrastructure and, where necessary, to construct improvements that increase capacity and avoid service degradation. New development will also be required to provide storm water control and meet energy efficiency standards as required under the Drainage and Energy Codes.

Impacts to other public services, including fire and police services, parks, and schools, are also expected to be minor. Demand for fire and police services are influenced by a number of factors including the number of service requests received and overall response times. While overall demand is not directly correlated with population and job growth, it is likely that potential additional housing could result in some increase in demand for fire and police services. The Police and Fire Departments regularly reassess their staff and

facility needs to ensure they are appropriate given expected demand.

Similarly, school enrollment is driven by a diversity of factors that are indirectly related to population and job growth. Service and facility needs are regularly reviewed to ensure they are appropriate given expected demand. Given the ability of the School District to modify enrollment boundaries to deal with small changes in enrollment, any impacts on school services are likely to be minor.

The project area is served by numerous park, green street and open space features that serve current employees and residents. However, despite the range of available facilities, the existing inventory falls short of meeting certain aspirational goals for per capita amounts and distribution within some parts of Seattle. These goals are expressed by Seattle Parks and Recreation plans for the purpose of understanding relative spatial distribution and sizing needs for future possible park and open space improvements. Seattle Parks and Recreation will continue planning the implementation of improvements citywide, which may include facilities that would help address identified geographical gaps or shortfalls in recreational facilities in this affected area. It should also be noted that the City's current Comprehensive Plan (as of March 2020) expresses a conclusion that "The City currently provides a good citywide system of libraries, parks and recreation facilities which are available and accessible for use by all the City's residents...While additions to these facilities would enhance the City's quality of life, such additions are not necessary to accommodate new households." This suggests that recreational needs are not expected to be satisfied exclusively by facilities located in a person's neighborhood, which diminishes the relevance of meeting per capita and geographic distributions as the primary measure of sufficiency. Due to the small scale of the proposed changes and the fact that townhouse and rowhouse development is spread across the city mean that any impacts to parks and recreation would be minor.

Proposed measures to reduce or respond to such demand(s) are: None proposed.

**7. Identify, if possible, whether the proposal may conflict with local, state, or federal laws or requirements for the protection of the environment.**

The proposal is believed to avoid conflicts with local, state, and federal laws and requirements for protection of the environment.

The City's Comprehensive Plan includes multiple goals and policies directing the creation of both market-rate and affordable housing in Seattle as well as other goals related to urban design, historic preservation, transportation, utilities, and the environment. This proposal seeks to balance and accomplish many of these objectives.

Below is a summary of specific selected goals and policies in Seattle's Comprehensive Plan that support this proposal:

- **Housing Goal 2:** Help meet current and projected regional housing needs of all economic and demographic groups by increasing Seattle's housing supply.
- **Housing Goal 3:** Achieve a mix of housing types that provide opportunity and choice throughout Seattle for people of various ages, races, ethnicities, and cultural backgrounds and for a variety of household sizes, types, and incomes.
- **Land Use Policy 5.2:** Develop and apply appropriate development standards that provide predictability regarding the allowed intensity of development and expected development types for each zone.