

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

BEFORE THE HEARING EXAMINER
CITY OF SEATTLE

In the Matter of the Appeal of:

**WALLINGFORD COMMUNITY
COUNCIL, ET AL.,**

of the adequacy of the FEIS issued by the
Director, Office of Planning and
Community Development.

Hearing Examiner File

W-17-006 through W-17-014

DECLARATION OF PAULA JOHNSON
BURKE, MA, RPA, IN SUPPORT OF
CITY OF SEATTLE’S RESPONSE TO
SCALE’S MOTION FOR SUMMARY
JUDGMENT

I, Paula Johnson Burke, declare and state as follows:

1. I am over eighteen years of age, have personal knowledge of the matters herein, and am competent to testify regarding all matters set forth herein.
2. I am a Registered Professional Archaeologist in the state of Washington and surpass the Secretary of the Interior’s standards for Professional Archaeologist. I have 26 years of experience in that field. Prior to becoming a registered archaeologist, I earned a Bachelor of Arts degree in anthropology from the University of Washington and a Master of Arts in museology with an archeology focus from the University of Washington. In my work as an archaeologist, I have prepared cultural and historic resources reports for numerous projects as part of their environmental review pursuant to the State Environmental Policy Act (SEPA) or the National Environmental Policy Act

1 (NEPA). In my work under SEPA, I have helped prepare and review environmental
2 checklists and have authored or reviewed historic resource impact analyses in
3 environmental impact statements (EISs). I am currently employed by Environmental
4 Science Associates (ESA) as Director of Cultural Resources for the northwest region.
5 Attached hereto as Exhibit A is a true and correct copy of my resume that includes a
6 description of representative projects on which I have worked.
7

8 3. In my professional capacity as Director of Cultural Resources, I worked on
9 the environmental review for the Citywide Implementation of Mandatory Housing
10 Affordability (MHA), which culminated in the Final Environmental Impact Statement
11 (FEIS) that is the subject of this appeal. I was responsible for supervising and reviewing
12 the analysis of impacts to historic resources that is described in chapter 3.5 of the FEIS. I
13 have reviewed the declaration of Katherine Wilson and agree with her opinion and
14 conclusions. In particular, in my expert opinion, I agree for the reasons Ms. Wilson
15 describes that our reliance on historic resources listed or determined eligible for listing in
16 the National Register of Historic Places is appropriate and reasonable. Additionally, in
17 my expert opinion, I believe our approach and level of detail in chapter 3.5 of the MHA
18 FEIS is reasonable for purposes of assessing potential impacts of this non-project action.
19 In my expert opinion, the extent of our identification and discussion of mitigation is
20 reasonable and is consistent with the level of discussion we have used in other EISs for
21 nonproject actions. I agree that our decision to not rely on information in the City's
22 database (the Seattle Historical Sites database) obtained from surveys of certain
23
24
25

1 neighborhoods is reasonable because the information is prone to overstate the nature of
2 the historic resources and their limited coverage (on only certain neighborhoods) would
3 prevent us from presenting information on each of the Urban Villages at a comparable
4 level of detail.

5
6 4. In my professional capacity as Director of Cultural Resources, I also
7 worked on the environmental review for the Uptown Urban Center Rezone which
8 included a Draft Environmental Impact Statement (“Uptown DEIS”) and culminated in a
9 Final Environmental Impact Statement (“Uptown FEIS”). I was responsible for
10 supervising and reviewing the analysis of impacts to historic and cultural resources that is
11 described in chapter 3.5 of the Uptown DEIS and the Uptown FEIS. Attached hereto as
12 Exhibit B is a true and correct copy of chapter 3.5 of the Uptown DEIS. Attached hereto
13 as Exhibit C is a true and correct copy of chapter 3.5 of the Uptown FEIS.

14
15 5. As with the MHA FEIS, we did not rely on information in the City’s Seattle
16 Historical Sites database for the Uptown FEIS, for the same reasons we decided not to
17 rely on the database for the MHA FEIS. In the Uptown FEIS, we also mapped designated
18 Seattle Landmarks and buildings older than 50 years or between 25 to 50 years old which
19 were not mapped in the MHA FEIS.

20
21 6. We included that additional information for the Uptown FEIS because
22 there was significantly more detailed, reliable information about historic resources
23 available for the Uptown neighborhood than compared to other City neighborhoods. This
24 information was available from analyses and studies completed in association with a
25

1 number of recent major projects in Uptown. In contrast, there is less information available
2 for other City neighborhoods analyzed in the MHA FEIS. Additionally, while the Uptown
3 FEIS analyzed a single neighborhood, the MHA FEIS required analysis of multiple
4 neighborhoods. Thus, for the MHA FEIS, we relied on information that was available for
5 all neighborhoods, and would permit a comparative evaluation across neighborhoods at a
6 similar level of detail and would not overstate or understate the impact on historic
7 resources in particular neighborhoods. In my expert opinion, the use of different
8 approaches and levels of discussion for the Uptown FEIS and the MHA FEIS was
9 reasonable, because of the differences in information availability and the different scope
10 of the analyses.
11
12
13

14 I declare under the penalty of perjury under the laws of the State of Washington
15 that the foregoing is true and correct.

16 EXECUTED in Seattle, Washington, this 22 day of May, 2018.

17
18
19
20
21
22
23
24
25


Paula Johnson Burke, Declarant

EXHIBIT A



Paula Johnson, MA, RPA

Archaeologist

EDUCATION

M.A., Museology
(Archaeology focus),
University of
Washington

B.A., Anthropology,
University of
Washington

26 YEARS OF EXPERIENCE

REGISTRATION

Registered
Professional
Archaeologist #10515

Paula has more than 25 years of experience with cultural resources projects in **Washington State/Pacific Northwest/Puget Sound**. She has prepared cultural resources discipline reports for numerous NEPA/SEPA projects including checklists, EAs, and EISs. She is well versed in the cultural resources regulatory environment on the federal, state, and local level. She has taken a lead role in assisting agency clients with consulting effectively with regulatory and tribal stakeholders. Paula has built consensus among diverse stakeholders, which has culminated in the development of unanticipated discovery plans, cultural resources treatment plans, and cultural resources programmatic agreements. Paula surpasses the Secretary of the Interior's Standards for Professional Archaeologist and is a Registered Professional Archaeologist.

Relevant Experience

WSDOT SR 99 AWV North Access, Seattle, WA. Project Manager. Under an ongoing on-call task order with WSDOT, ESA has conducted testing of an archaeological site associated with the construction of the SR 99 Tunnel in downtown Seattle. Paula directed the testing effort and coordinated with WSDOT about project activities, access (security), and health and safety concerns. Paula completed the project cultural resources report and was involved with informing project stakeholders, including DAHP, tribes, and King County of project progress and findings.

Colman Dock Underwater, Seattle, WA. Project Manager. Under an on-call task order with Washington State Ferries, ESA has coordinated with multiple stakeholders including Ferries, DAHP, tribes, City of Seattle, USACE, Federal Transit Administration, and others in order to come to agreement on eligibility of two submerged historic archaeological sites near the Colman Dock ferry terminal. Field work required heavy coordination to address safety and access (security) underneath the ferry dock. Evaluation of the resources was a complex concern with overlapping jurisdictions; Paula was tasked with balancing the Section 106 regulatory issues with the concerns raised by stakeholders.

Chehalis-Centralia Airport, Chehalis, WA. Cultural Resources Lead. Paula assisted the City of Chehalis with several airport improvements including run-up aprons, runway lighting, and paving for future hangars. The airport includes multiple archaeological sites which overlap several of the work areas. Paula assisted the FAA with coordinating with the Chehalis Tribe and Cowlitz Tribe to develop a monitoring approach. Paula oversaw preparation of an Archaeological Resources Monitoring Plan as well as assisting the FAA with defining the Area of Potential Effects (APE) to meet the FAA's requirements under Section 106 of the National Historic Preservation Act.

Maroon Ponds Cultural Resources Assessment, Hillsboro, OR. Cultural Resources Lead. Paula directed the cultural resources assessment for Clean Water Services' Maroon Ponds Natural Area Wetland Enhancement Project to expand floodplain wetlands and create habitat. ESA's analysis of site conditions and construction impacts revealed that preconstruction archaeological survey was not practical. As an alternative, ESA recommended archaeological monitoring following removal of an artificial berm and elevated farm road. By recognizing the impracticality of archaeological survey in this case, ESA's approach, which was accepted by USACE and Section 106 Consulting Parties, avoided unnecessary regulatory delays to project schedule, as well as project costs. Paula's team performed monitoring during construction and completed all cultural resources tasks on-time and within budget.

East Link Light Rail Extension, Bellevue, WA. Project Manager. Paula is the project manager for a ten-year contract that began in 2013 to provide archaeological services for East Link Extension. The contract includes nine main tasks to be completed during the final design, preconstruction, and construction phases. To date, Paula has co-authored the East Link Archaeological Monitoring and Treatment Plan as well as Inadvertent Discovery Plans for each of the six construction contracts. Paula has overseen preconstruction cultural resources surveys of the high probability portions of the project alignment and the offsite mitigation areas. She has directed investigations of possible cultural finds and monitoring during preconstruction utility relocation tasks.

Seattle City Light, Denny Substation SEPA EIS. Cultural Resources Lead. Paula led cultural resources tasks for a SEPA EIS conducted for the Denny Substation project. Paula coordinated with the City Light project manager, City of Seattle Historic Preservation Program, and other team members to define the cultural resources study areas, develop an approved methodology, and prepare multiple draft documents. Transmission lines are expected to go through the boundaries of four historic districts which will require special review and approval. This project is on-going.

Duwamish Gardens. Cultural Resources Lead. As part of the design team, Paula led cultural resources tasks for a fish habitat restoration project on the Duwamish River in Tukwila, WA. The restoration project area contains a previously recorded Native American site but the boundaries of the site were not fully documented. Paula coordinated with USACE, multiple tribes, and multiple local government representatives to develop a plan to delineate the site boundaries. Paula oversaw completion of field work and preparation of the site delineation report. As the project moves forward, Paula will assist with preparing additional documents as may be required following cultural resources consultation.

Kelso Airport, Kelso, WA. Cultural Resources Lead. Paula is the Cultural Resources Lead for the West Side Hangar Development Project at the City of Kelso airport. The first stage of the project, which has FAA funding, includes improvements to landside facilities on the west side of the airport. Paula managed ESA's work and oversaw preparation of a Cultural Resources Technical Memorandum to meet the FAA's requirements under NEPA to facilitate review of the project as required by Section 106 of the National Historic Preservation Act.

Lake Roosevelt Incremental Storage Releases Program SEIS, Lake Roosevelt, WA. Cultural Resources Lead. Paula prepared cultural resources sections for a supplemental environmental impact statement evaluating the impacts of additional drawdowns from Lake Roosevelt to meet the requirements of 2006 legislation of the Columbia River Basin Water Management Program. Paula participated in multiple stakeholder meetings, reviewed documents prepared by stakeholders, including the Colville Tribe, and responded to public and regulatory comments on the draft EIS.

Des Moines North Marina Combined Improvements Project Monitoring, Des Moines, WA. Cultural Resources Lead. As a subconsultant, Paula assisted the City of Des Moines with meeting cultural resources regulations during multiple phases from the permitting process through construction of the project. Paula directed staff in conducting construction monitoring required by the Corps for a marina improvement project that included multiple different types of ground disturbance along the Puget Sound shoreline. The proposed improvements at the Marina were within close proximity to previously recorded archaeological sites and the US Army Corps of Engineers required a monitoring plan be developed based on concerns of the Puyallup Tribe. Paula co-wrote an archaeological resource monitoring plan (ARMP) which was approved by the Corps. The ARMP included specific thresholds for reevaluating the level of effort based on the results of monitoring. This approach ultimately reduced the original monitoring budget by approximately 40% while continuing to retain the City's compliance with Section 106. Monitoring was conducted in two phases over nine months; portions of the construction occurred underwater and required tailored monitoring techniques.

King County Water and Land Resources Division, On-Call Archaeological, Cultural & Historical Resource Review Services, King County, WA. Project Manager. Paula managed all aspects of sole-source on-call cultural resources for over 30 task orders (many conducted concurrently) and assisted on many multi-phase projects where survey was followed by a monitoring plan and monitoring under NEPA and SEPA, including the National Historic Preservation Act.

USACE, Walla Walla District, On-Call Architecture-Engineering Services for Planning and Reconnaissance Studies, Walla Walla, WA. Archaeologist. Paula provided cultural resources sub-consultant services as part of larger three-year environmental on-call contract for the US Army Corps of Engineers. She developed scopes of work and budgets; managed multiple concurrent task orders, most with multiple phases; coordinate with other team members on scheduling and deliverables. Task orders have included survey and testing, site recording, site mapping, site monitoring for erosion and other adverse impacts, digitization of historic records to provide information on previous ground disturbance, and completion of Determinations of Eligibility forms. Eight task orders issued. comments on the draft EIS.

Lake Roosevelt Incremental Storage Releases Program SEIS, Lake Roosevelt, WA. Cultural Resources Lead. Paula directed completion of cultural resources technical memorandum and Supplemental EIS sections for Ecology. Project tasks included identification of affected environment, evaluation of impacts, and development of mitigation measures. Participated in stakeholder meetings and responded to scoping comments.

Riverfront Development, Everett, WA. Cultural Resources Lead. Paula directed documentation of historic properties within the proposed Riverfront Park, including the Eclipse Mill crane and the wooden wharf. This work was done in anticipation of meeting minimum historic documentation requirements. As development of the park continues, Paula will continue to provide assistance to the design team and the City.

Sound Transit Issaquah Transit Center, Issaquah, Washington. Archaeologist. As a subconsultant, Paula conducted archival research and completed a cultural resource assessment for the proposed construction of Sound Transit's new transit center in Issaquah, Washington. Paula prepared a cultural resources technical memo per FWHA/FTA NEPA and Section 106 guidelines. She also prepared a delineation of the Area of Potential Effect (APE) and assisted Sound Transit in the preparation of consultation and coordination materials to be sent to the Washington State Department of Historic Preservation and potentially affected Tribes.

King Street Station Archaeological Monitoring, Seattle, WA. Archaeologist. Paula led cultural resources monitoring efforts during construction of geothermal wells and other utilities at the historic King Street Station in downtown Seattle. The 1905 train station is listed on the National Register of Historic Places and is located within the Pioneer Square Historic District. Paragon conducted work during three phases of construction, which was partially funded by FTA. Paula was instrumental in assisting SDOT with revising the proposed level of effort for monitoring and has worked efficiently with construction project managers to reduce costs while providing adequate coverage when a historic archaeological site was identified. Paula oversaw completion of a site report and curation of the artifacts recovered during the project.

Certifications and Training

2009 Section 106 Advanced Seminar (Preparing Effective Agreements)

2009 Section 4(f) Compliance for Historic Properties

2008 Advisory Council on Historic Preservation Section 106 Seminar

2007 Native American Cultural Property Law Seminar

EXHIBIT B




CITY OF SEATTLE
Office of Planning & Community Development

July 18, 2016

A teal-tinted background image of the Seattle skyline, featuring the Space Needle prominently on the left. The city buildings and mountains in the distance are visible through the haze.

DRAFT EIS /

UPTOWN
Uptown Urban Center Rezone



SECTION 3.5 / Historic and Cultural Resources

This section addresses potential impacts to listed and potentially eligible historic properties in the Uptown Urban Center, as well as identified and unidentified below-ground cultural resources.

For historic register resources, potential impacts were assessed based on their potential permanence. For this Draft EIS, significant impacts to historic register resources would result if an alternative:

- Incentivizes designated historic landmarks to be demolished for redevelopment;
- Allows development to occur in a manner that could adversely impact the character of an adjacent designated landmark; or
- Incentivizes known eligible sites to redevelop without consideration as potential landmarks.

Any ground disturbance has the potential to impact below-ground cultural resources, if present. If impacts were to occur, they would be irreversible and permanent. For this Draft EIS, significant impacts to below-ground resources would result if an alternative:

- Incentivizes sites to redevelop where irreversible and permanent impacts to intact below-ground cultural resources could occur.

3.5.1 AFFECTED ENVIRONMENT

The Uptown neighborhood, located at the foot of Queen Anne Hill, was, for most of its history, known as Lower Queen Anne. In 1994 it was acknowledged as its own neighborhood, with Seattle Center as its heart. As a designated urban center, the neighborhood is a mix of commercial and residential buildings. This is consistent with the area's history, as demonstrated below.

PLANNING AND POLICY CONTEXT

Impacts to cultural resources are typically considered if there are buildings, structures, or sites that are on or near the project area, over 45 years old, and listed or eligible for listing in national, state, or local historic preservation registers.

Applicable national, state, and local historic preservation registers reviewed for this project include the following:

- National Register of Historic Places (NRHP), as established through the National Historic Preservation Act (NHPA)
- Washington Heritage Register (WHR) and Washington Heritage Barn Register (WHBR)
- Seattle City Landmarks (SCL)

The historical significance required for listing on each register varies based on criteria including association with significant events, significant people, distinctive architectural or artistic value, or ability to inform our past. Properties can possess significance on multiple levels and thus be listed on more than one register.

The age at which a property can be considered "historic" varies by register. (See Exhibit 3.5-1) For the NRHP, WHR, and WHBR, the standard threshold is 50 years, while for Seattle City Landmarks

Exhibit 3.5-1 Historic Registers Applicable to this Project

State / Local Preservation Register	Standard Age Threshold	Managing Agency
Washington Heritage Register (WHR)	50 years	DAHP*
Washington Heritage Barn Register (WHBR)	50 years	DAHP*
Seattle City Landmark (SCL)	25 years	City of Seattle

*DAHP = Department of Archaeology and Historic Preservation

Source: DAHP, 2016; Seattle Department of Neighborhoods, 2016

the standard threshold is 25 years. A property that has achieved exceptional significance within a shorter timespan can also be considered eligible for the NRHP and Seattle City Landmark, although this is rare. Changes to designated Seattle City Landmarks are managed through the Certificate of Approval (COA) process (Seattle Department of Neighborhoods, 2016a). The COA process typically involves multiple meetings and includes an appeals process.

There are several Washington State laws protecting archaeological resources that apply to the Uptown study area: Archaeological Sites and Resources (Chapter 27.53 RCW), Indian Graves and Records (Chapter 24.44 RCW), Abandoned and Historic Cemeteries and Historic Graves (Chapter 68.60 RCW), and Human Remains (Chapter 68.50 RCW).

The non-project proposal is not subject to compliance with federal cultural resources regulations because there are no federal funding, federal permits, or federal lands involved. However, the Seattle Landmark regulations refer to NRHP eligibility. Therefore, familiarity with the eligibility criteria is helpful. In brief, a resource can be eligible for listing on the NRHP if it has integrity of location, design, setting, materials, workmanship, and feeling and is associated with significant events, significant people, embodies distinctive architectural characteristics, or has the potential to yield important information about history or prehistory.

PRECONTACT PERIOD

The precontact cultural chronology of the Pacific Northwest and Puget Sound from the Late Pleistocene onward has been previously summarized (Ames & Maschner, 1999; Blukis Onat, 2001; Kidd, 1964; Matson & Coupland, 1995; Nelson, 1990). The various chronologies generally agree on broad patterns in culture but may differ regarding the timing and significance of changes in specific aspects of culture, such as subsistence, technology, and social organization. The following discussion of cultural-historical sequence draws broadly on the various chronologies, but follows Ames and Maschner (1999) by recognizing five periods:

- Paleoindian (before 12,500 years ago)
- Archaic (12,500 to 6,400 years ago)
- Early Pacific (6,400 to 3,800 years ago)
- Middle Pacific (3,800 to 1,800/1,500 years ago)
- Late Pacific (1,800/1,500 years ago to AD 1851)

The Late Pacific period overlaps slightly with the Ethnographic period, as discussed below. Information about each period is summarized in Exhibit 3.5-2.

Exhibit 3.5-2 Precontact Time Periods

Time Period	Approximate Date Range	Characteristics
Paleoindian	Before 12,500 years ago	Often referred to as Clovis culture and located in the uplands; represented by projectile points*
Archaic	12,500 to 6,400 years ago	Often referred to as Olcott culture and located in riverine and lake settings; represented by cobble tools and lanceolate* projectile points
Early Pacific	6,400 to 3,800 years ago	Located in marine and estuary settings; represented by large shell middens* and decorative artifacts such as labrets* and bracelets
Middle Pacific	3,800 to 1,800/1,500 years ago	Represented by large plank houses, increase in decorative items, woodworking tools (adzes*, mauls*, wedges*)
Late Pacific	1,800/1,500 years ago to AD 1851	Represented by seasonal camps associated with resource procurement and increased variability in burial methods
Ethnographic Period	AD 1792-1851	The same as Late Pacific sites; non-Native tools and materials may be present

* Projectile points are chipped stone artifacts used to tip arrows, dart points, or spears; Lanceolate projectile points are a specific type of projectile point; middens are archaeological deposits consisting of refuse from human activities, usually composed of a mixture of soil, charcoal, and various food remains such as bone, shell, and carbonized plant remains--they may also contain human remains; labrets are personal adornment items made of stone or bone and are worn in the lower lip; adzes, mauls, and wedges are hand tools used for woodworking.

Source: Ames & Maschner, 1999

ETHNOGRAPHIC PERIOD

The ethnographic period is when the first non-Native peoples came to the area. Generally, the ethnographic period began in 1792 and ended in 1851. Therefore, there is some overlap between the Precontact and Ethnographic periods.

After passage of the 1850 Donation Land Act of Oregon, settlers began to claim homestead lands throughout the Puget Sound region, including within the Uptown area. Early settlements were located in easily accessible areas, such as boat landings on lakeshores, along trails, wagon roads, and railroads, or at river mouths (U.S. Coast Guard, 1879; U.S. Coast Guard, 1889; U.S. Coast Guard, 1907; U.S. Surveyor General, 1856a; U.S. Surveyor General, 1856b; U.S. Surveyor General, 1863a; U.S. Surveyor General, 1863b).

The Uptown area is located within the traditional territory of members of today's Muckleshoot Tribe, the Suquamish Tribe, the Snoqualmie Tribe, and the Tulalip Tribes (Suttles & Lane, 1990). These four tribes are federally recognized. The Duwamish Tribe, which is seeking federal recognition, is also an interested tribal group located in the area.

There are several recorded Native American names for places in or near the Uptown area. They include *Babaqʷəb*, *T!E'kEp*, and *Ctca'q'cīd* (Hilbert, 2001; Thrush, 2007; Waterman, 1922). *Babaqʷəb* ("prairie") is an open space in the area of what is now Belltown and Seattle Center (Hilbert, 2001, p. 60). Two longhouses were reported as being here, middens were created along the nearby shorelines, and the areas resources were used for subsistence (Thrush, 2007, p. 228). *T!E'kEp* ("aerial duck net") was the name for a path ducks followed while flying between the south end of Lake Union and Smith Cove. The birds would fly low over the base of Queen Anne Hill, and snares were put up in this area to catch them (Thrush, 2007, pp. 227-228; Waterman, 1922, p. 188). *Ctca'q'cīd* ("where a trail descends to the water") was a trail passing through Uptown leading from the Seattle harbor to Lake Union and the site of the Denny sawmill at the south end (Waterman, 1922, p. 192).

HISTORIC PERIOD

After the Denny-Boren Party moved from their initial landing point at Alki Beach in 1851 to the east side of Elliott Bay in 1853, Euroamerican settlement gradually moved north into what is now downtown Seattle and up onto Queen Anne Hill. While that period between 1852 and 1870 was slow for the growth of the City, several of the City's most influential families claimed land on the Hill, including the Dennys, the Mercers, and the Smiths. Development on and around Queen Anne Hill focused mostly on clearing the area of trees and the construction of early roads that later formed the backbone for growth of the area.

Over the next several decades, the slopes of Queen Anne Hill developed in earnest. Cable car routes transported the wealthier residents living in the elegant, Queen Anne-style homes on the crest of the hill down into the city. These homes are the hill's namesake. In the early 1900s the framework of the neighborhood was completed as streets were laid out, utilities installed, and parks were established. As growth in other parts of the City continued,

middle-class housing and businesses filled out the remaining lots on the hill. By the time of the Great Depression, Queen Anne had become a distinct urban district.

Lower Queen Anne came into its own when the 1962 Seattle World's Fair used the existing Auditorium, Armory, and Memorial Field as the center of the complex. The fairgrounds were developed over 74-acres that included the original Denny plats and *Babaq'əb*. Those buildings constructed for the fair have since been repurposed and remain at Seattle Center (Lentz, 2005).

Rezoning in the 1950s led to redevelopment of many lots in Lower Queen Anne in the 1960s and 1970s, changing the character of parts of the neighborhood from one- and two- story homes to larger apartment and condominium complexes. That area now known as Uptown became concentrated with commercial and office buildings. Many of the older buildings in the area were repurposed to residential and commercial (Williams, 2015).

In 1994, the City of Seattle identified Uptown as a distinct neighborhood. Over the past two decades the historic character of the neighborhood has been maintained in some areas and converted in others as increased development and population density occurred in the neighborhood.

Findings

Historic Properties

In 2008, the *Seattle Center Century 21 Master Plan* was prepared (City of Seattle, 2008). Included in the document are plans to draw better connections between the Center and surrounding neighborhoods, through creating more open space, redeveloping existing structures, and improving transportation. At that time, there were four Seattle Landmarks at the Center. Since then, another four have been designated.

As part of that plan, several of the existing structures comprising Seattle Center are planned for demolition or extensive renovation, which will be completed through the Landmarks COA process. These include Memorial Stadium, Center House, Mercer Arena, and the vicinity of Key Arena, to name a few.

As of April 2016, there were 26 above-ground properties within the Uptown area listed on historic registers. There are no recorded

historic cemeteries (Department of Archaeology and Historic Preservation, 2010). As shown in Exhibit 3.5-3 and on Exhibit 3.5-4, above-ground historic properties are generally clustered within and around the Seattle Center along the Uptown Corridor and Mercer/Roy Corridor. The listed properties date from 1891 to 1964 and are

Exhibit 3.5-3 Historic Properties in the Uptown Urban Center listed in Historic Registers

No.*	Address	Building	Register**	Year Built
1	1038 Elliott Ave W	Wilson Machine Works	NRHP, WHR	1925
2	115 W Olympic Pl	De La Mar Apartments	NRHP, WHR, SCL	1909
3	200 2nd Ave N	Pacific Science Center	SCL	1962
4	201 Mercer St	Playhouse–Century 21 Exhibition	NRHP, WHR	1962
5	26 W Harrison St	Delmasso Apartments	NRHP, WHR	1930
6	305 Harrison St	Washington National Guard Armory / Food Circus / Center House	NRHP, WHR, SCL	1939
7	305 Harrison St	Washington State Coliseum / Coliseum Century 21 / Key Arena	NRHP, WHR	1962
8	305 Harrison St	Sweden Pavilion / Northwest Craft Center	NRHP, WHR	1962
9	305 Harrison St	International Commerce and Industry Building / Northwest Rooms and International Pavilion	NRHP, WHR, SCL	1962
10	305 Harrison St	Great Britain Pavilion / Seattle Center Pavilion	NRHP, WHR, SCL	1962
11	305 Harrison St	Monorail Office	NRHP, WHR	1962
12	305 Harrison St	Monorail Terminal	NRHP, WHR	1962
13	305 Harrison St	NASA Warehouse	NRHP, WHR	1962
14	305 Harrison St	Friendship / Kobe Bell	NRHP, WHR, SCL	1962
15	305 Harrison St	The Seattle Mural / Century 21 Mural	NRHP, WHR, SCL	1962
16	305 Harrison St	International Fountain	NRHP, WHR	1961
17	401 5th Ave	Memorial Stadium	NRHP, WHR	1947
18	415 1st Ave N	Queen Anne Post Office	NRHP, WHR	1964
19	505 1st Ave N	Wedgewood Apartments	NRHP, WHR	1930
20	566 Denny Way	Seattle First National Bank	NRHP, WHR, SCL	1950
21	600 Queen Anne Ave N	Marqueen Apartments	NRHP, WHR	1918
22	7 Harrison St	Strathmore Apartments	NRHP, WHR	1908
23	934b Elliott Ave W	Sheet Metal Works and Roof Company	NRHP, WHR	1948
24	5th Ave	Alweg Monorail	NRHP, WHR, SCL	1962
25	Republican & 6th Ave	Lake Union Sewer Tunnel	NRHP, WHR	1891
26	219 4th Ave	Space Needle	SCL	1962

* Number corresponds with Exhibit 3.5-4 on page 3.182.

** NRHP = National Register of Historic Places; WHR = Washington Heritage Register; SCL = Seattle City Landmark

Source: DAHP, 2010; Seattle Department of Neighborhoods, 2016

3.5 HISTORIC AND CULTURAL RESOURCES



Exhibit 3.5-4 Map of Historic Sites in the Uptown Urban Center listed in Historic Registers

- Urban Center Boundary
- # Historic Property Number

Source: DAHP, 2010; Seattle Department of Neighborhoods, 2016

listed on the National Register of Historic Places (NRHP), Washington Heritage Register (WHR), or are designated Seattle City Landmarks (SCL). Some properties are listed on multiple registers. All properties listed on the NRHP are automatically listed on the WHR.

There are 16 properties listed in both the NRHP and WHR, eight are listed in the NRHP, WHR, and SCL, and two are listed solely as a SCL. An additional 77 properties in the Uptown area have been recorded, but no register determinations have been made.

Previous Archaeological Work

Twelve cultural resources surveys have been previously prepared within the Uptown area, but these studies cover less than 40 percent of the Uptown area and include very little subsurface investigation (Department of Archaeology and Historic Preservation, 2010). These reports were prepared by a range of project proponents for a variety of project types, including construction of highways and roads, transit facilities, and utility installation. The reports vary from simple literature reviews and summaries of historic and cultural resource field surveys, to archaeological site investigations at identified sites. Reports have been conducted at a variety of jurisdictional levels.

The most comprehensive of these studies included areas within the Uptown Corridor and Uptown Park–Central neighborhoods, as well as portions within the Mercer-Roy Corridor and Uptown Triangle neighborhoods (Forsman, 1997). Limited subsurface investigation was undertaken, but over 200 historic properties were inventoried. Most of these were outside of the Uptown area, and none of those within the Uptown area were recommended eligible for listing.

As of April 2016, previous archaeological reports have identified three archaeological sites in the Uptown area. The locations of these sites are protected from public disclosure under state law (RCW 42.56.300) and therefore are not mapped for this study. Of the recorded sites, two are from the historic period and one is from the historic and ethnographic periods.

Precontact Period Archaeological Sites. Archaeological evidence indicates that Native Americans have lived within the region and along the shores of Puget Sound for more than 4,000 years (Larson, 1995). DAHP's statewide predictive model classifies the Uptown area as moderate to very high risk for containing Precontact archaeological sites (Exhibit 3.5-5). The statewide predictive model is a tool used by archaeologists and planners to evaluate potential archaeological risks on a broad scale. The model was developed to statistically evaluate multiple environmental factors (i.e., elevation, slope percent, aspect, distance to water, soils, and landforms) to predict where cultural resources might be found (Kauhi, 2013). It is not a substitute for conducting site-specific subsurface investigations, which may be required for project-level review.

3.5 HISTORIC AND CULTURAL RESOURCES



Exhibit 3.5-5 Precontact Archaeological Predictive Model

- Urban Center Boundary
 - Open Space and Recreation
 - Seattle Center Management Area (Non Open Space and Recreation)
- Risk**
- Low
 - Moderately Low
 - Moderate
 - High
 - Very High

Historic Period Archaeological Sites. As of April 2016, there were three recorded historic archaeological sites located in the Uptown area (Department of Archaeology and Historic Preservation, 2010). These date from ca. 1890 to ca. 1950 and include transportation, infrastructure, commercial, and domestic remains. Two of these have been determined Not Eligible for listing in the NRHP, and one has not been evaluated.

Source: DAHP, 2010

3.5.2 IMPACTS

IMPACTS COMMON TO ALL ALTERNATIVES

Above-ground Resources

All alternatives could affect established or potential historic register properties, districts, or landmarks as a result of development pressure. Exhibit 3.5-6 identifies locations of historic properties on blocks proposed for increased height limits under Alternatives 2 and 3. Exhibit 3.5-7 shows those properties in the Uptown Study Area that meet the minimum age threshold for consideration for listing in the NRHP or recognition as a Seattle City Landmark. Impacts could include demolition of such properties, or inappropriate rehabilitation and re-use that could change the character and/or setting, or result in changes in the physical context (i.e., new construction adjacent or across the street). Because Seattle SEPA policies require investigation of historic significance of structures over 25 years of age as part of project-level SEPA review (when required), rezoning may also encourage preservation efforts through the nomination of historic properties, districts, or landmarks. Owners of buildings listed in the NRHP are provided the opportunity receive federal investment tax credits, matching grant-in-aid funds for restoration, and free technical assistance from DAHP for the maintenance, rehabilitation, and restoration of the property. For Seattle City Landmarks, incentives include special tax valuation, and zoning and building code relief.

As detailed in Section 3.1 Land Use, several redevelopment projects are expected within the Uptown area in the future with, or without the rezone. Properties currently identified as redevelopable include two register-listed structures: Wilson Machine Works (site 1, Exhibit 3.5-4), and the Sheet Metal Works and Roof Company (site 23, Exhibit 3.5-4). These are the only two register-listed structures on properties identified as either in permitting or redevelopable. Depending on how these properties are redeveloped (e.g., if the structures are demolished or incorporated into a new building design), impacts could be significant.

3.5 HISTORIC AND CULTURAL RESOURCES

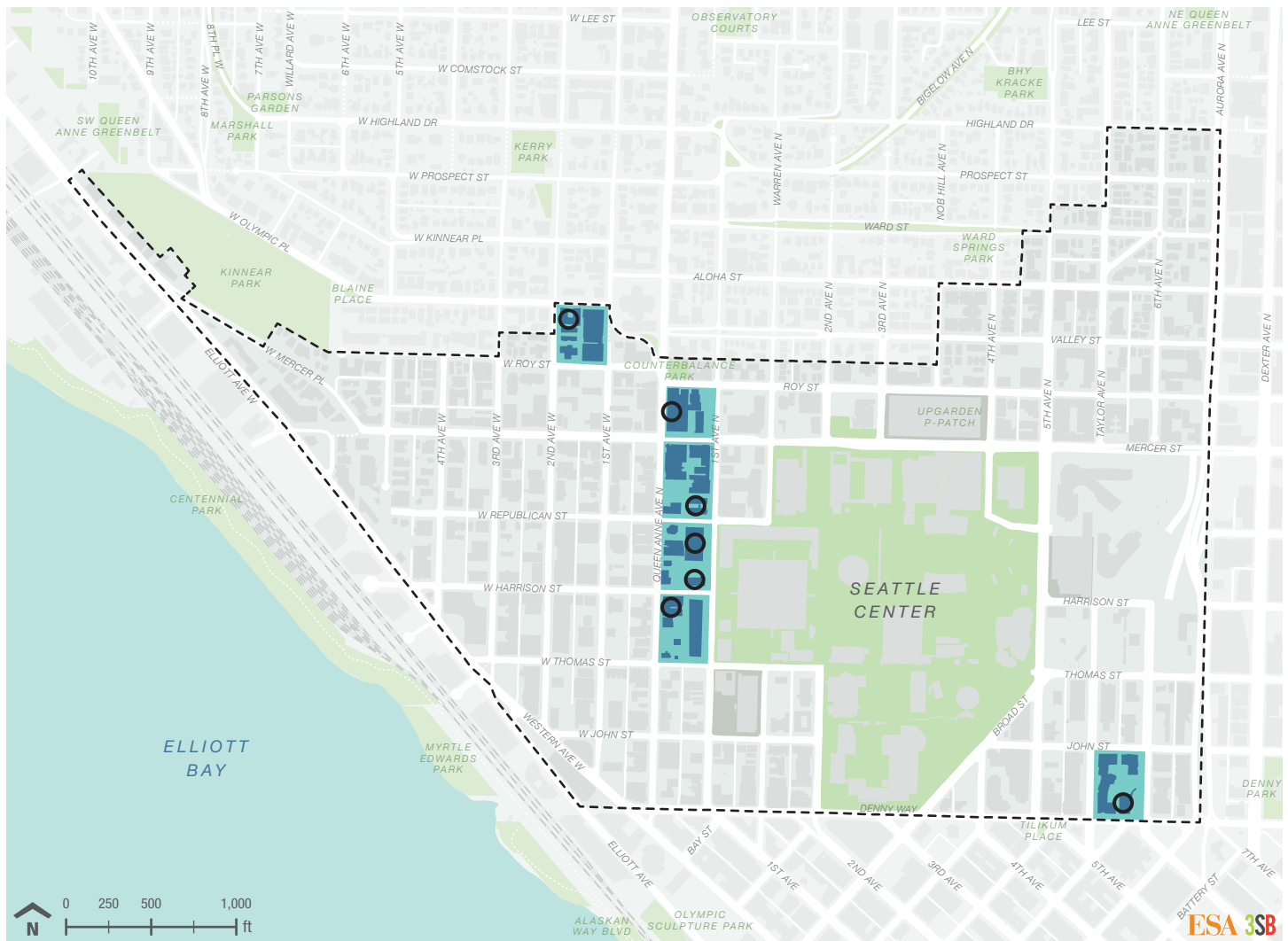


Exhibit 3.5-6 Locations of Historic Properties on Blocks Proposed for Increased Height Limits under Alternatives 2 and 3

- Urban Center Boundary
- Open Space and Recreation
- Seattle Center Management Area (Non Open Space and Recreation)
- Historic Properties on Blocks Proposed for Increased Height Limits Under Alternatives 2 and 3**
- Blocks with Register and/or Landmark-listed Properties
- Buildings on Blocks with Register and/or Landmark-listed Properties (2012)
- Historic Sites

Source: DAHP, 2010; Seattle Department of Neighborhoods, 2016

Below-ground Resources

Redevelopment would occur under all alternatives. Any ground disturbance has the potential for significant, irreversible impacts to below-ground cultural resources because of damage, destruction, or loss of integrity.

IMPACTS OF ALTERNATIVE 1 NO ACTION

Under Alternative 1 No Action, current zoning designations and height limits would remain. Even without increased height limits and new development incentives, existing market-forces and presence

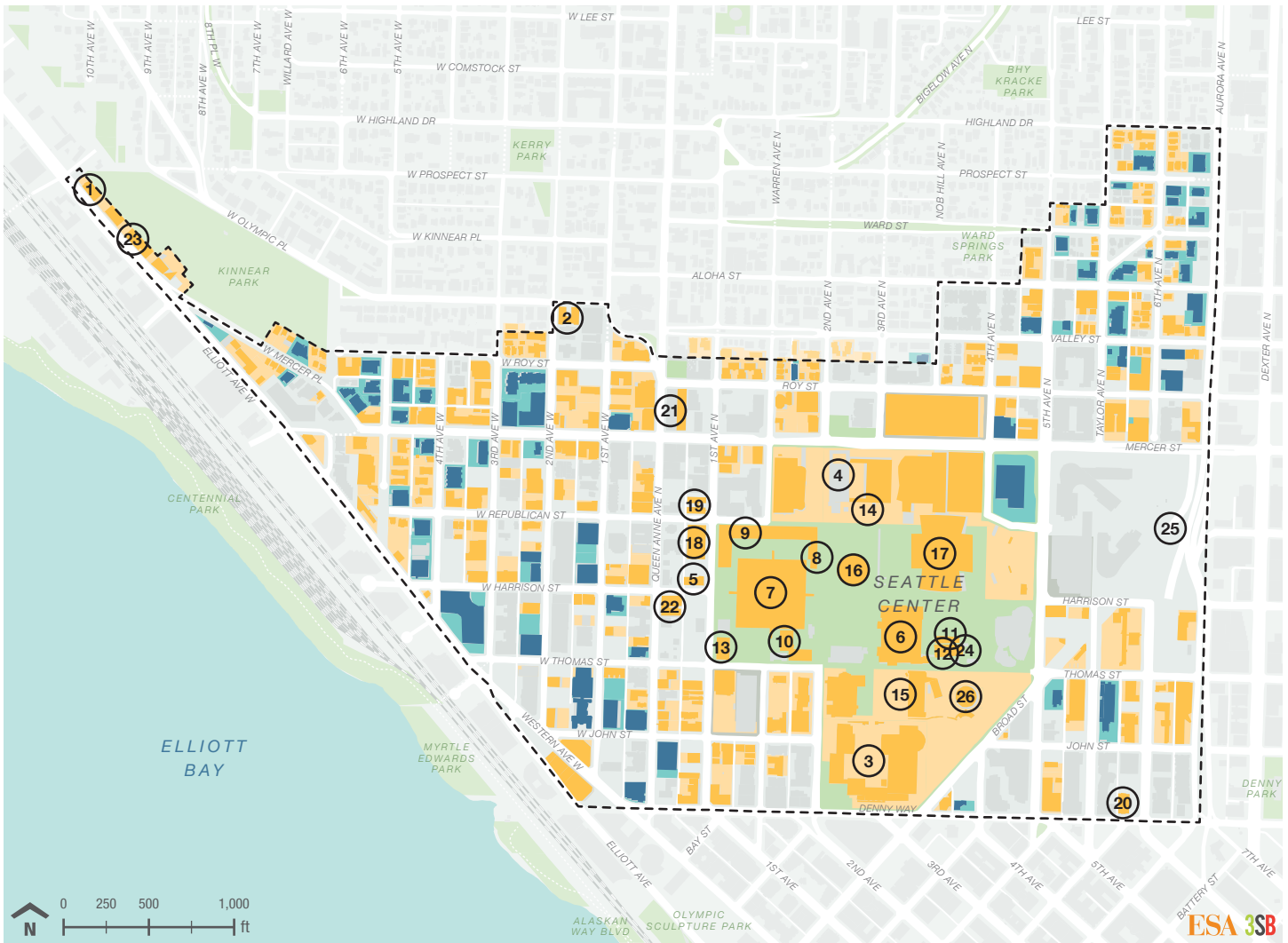


Exhibit 3.5-7 Register and Landmark-Listed and Potentially Register or Landmark-Eligible Properties

- Urban Center Boundary
- Open Space and Recreation
- Seattle Center Management Area (Non Open Space and Recreation)
- Register and Landmark-Listed and Potentially Register or Landmark-Eligible Properties**
- Meets minimum-age threshold for NRHP eligibility (50 years, pre-1967)
- Meets minimum-age threshold for SCL eligibility (25 years, pre-1992)
- Historic Sites

Source: DAHP, 2010; Seattle Department of Neighborhoods, 2016

of potential redevelopable properties in the Uptown area suggest that the pressure on historic resources is likely to continue and increase over time. As redevelopment projects are implemented, existing historic properties could be demolished (significant impact to historic properties) and new structures built (significant impact to below-ground cultural resources) that could alter the character of the neighborhood or nearby and adjacent resources. Compared to the Action Alternatives, there would likely be less redevelopment pressure in the Uptown area and less potential for significant impacts, given that no new zoning would be established.

IMPACTS OF ALTERNATIVE 2 MID-RISE

Alternative 2 Mid-Rise provides for moderate height increases across a large area of Uptown. Increases in height limits in some residential areas and commercial and mixed use areas could incentivize redevelopment that could include demolition of register-listed or potentially-eligible properties (see Exhibit 3.5-6 and Exhibit 3.5-7). Similarly, increased height limits may promote development that could adversely impact the character of adjacent and nearby landmarks, register-eligible, and potentially-eligible properties. For example, the height limits of several blocks that include register or landmark-listed buildings are proposed to be raised 20 to 45 feet, potentially altering some characteristics that make those properties eligible (see Exhibit 3.5-3). One is the Marqueen Apartment building on the northeast corner of Queen Anne Avenue N and Mercer Street (property 21 in Exhibit 3.5-4). This is a three-story building approximately 35 feet tall. The building has been determined NRHP and WHR Eligible based on its architectural character and siting on a prominent corner in the heart of Uptown. Increasing adjacent height limits to 85 feet has the potential to significantly impact the building's prominence and regard in the neighborhood.

Increases in height allowances also have the potential to impact views of additional eligible or potentially-eligible historic properties in and around Uptown, as viewsheds and neighborhood character, particularly of the residential blocks, are affected by a changing skyline (see Exhibit 3.5-7). Increasing the height limits of those blocks surrounding Seattle Center has the potential to impact views to and from the Center.

IMPACTS OF ALTERNATIVE 3 HIGH-RISE

Alternative 3 High-Rise would have similar impacts in residential areas, where height limits would be similar to Alternative 2. In commercial and mixed use areas, greater height limits may further incentivize the demolition of older properties, including some potentially register-listed or potentially-eligible properties. Neighborhood districts with the greatest height increase compared to Alternative 2 (Mercer-Roy Corridor, Uptown Park–Central, Uptown Corridor, and portions of the Taylor–Aloha Blocks) may experience the most redevelopment pressure.

Redevelopment in these areas could adversely impact the character of adjacent and nearby landmarks, register-eligible, and potentially-

eligible properties. For example, Seattle Center contains the majority of the listed historic properties in the Uptown area. Changes in height limit of 125 feet instead of 85 feet are proposed for the northeast corner currently developed with the KCTS building. Height limits in surrounding blocks are also proposed to be raised from 40, 65, and 85 feet to 160 feet.

The height limits of several blocks that include register-listed buildings are proposed to be raised substantially, potentially altering some characteristics that make those properties eligible, such as the Marqueen Apartment building as described in Alternative 2. Another example is the block containing the Queen Anne Post Office, where height limits would increase from 65 feet to 160 feet. One of the characteristics of this building that makes it eligible at the local level is how its architecture and landscaping was designed to blend with Seattle Center on the opposite side of 1st Avenue North. For example, the trees on the east elevation along Republican and 1st Avenue N were part of the landscape design for the Seattle Center, and were planted before construction of the Post Office began. “These sycamores were chosen in 1964 by famous Washington architect Paul Thiry and the renowned landscape architecture firm of Richard Haag and Associates” (Artifacts Architectural Consulting, 2009, p. 16). If the height limits are increased, buildings that extend 95 feet over the existing Post Office have the potential to diminish those characteristics.

Increases in height allowances also have the potential to impact more eligible or potentially-eligible historic properties in and around the Uptown area (see Exhibit 3.5-7), as viewsheds and neighborhood character, particularly of the residential blocks, are affected by a changing skyline. As described in Section 3.1 Land Use, FAR limits on buildings coupled with the distance to the Center itself, may reduce impacts to register listed or potentially-register listed properties from significant to low or moderate.

3.5.3 MITIGATION MEASURES

INCORPORATED PLAN FEATURE

The adopted Queen Anne Plan, June 1998, recognizes the historic character of the Uptown neighborhood. Specific policies promote new development consistent with the historic character of Queen

Anne Boulevard and suggest the creation of a conservation district to retain the art deco influenced multi-family housing along Roy Street.

REGULATIONS AND COMMITMENTS

Above-ground Resources

For any project-level proposal, potential impacts to eligible or listed historic register properties, mitigation measures would depend upon the nature of the property and the characteristics contributing to its significance. Compliance with Seattle policy (SMC 25.05.675H) regarding investigation and nomination of potentially eligible properties would provide an opportunity for project level mitigation. If impacts to a designated Seattle City Landmark are proposed, the project will be subject to the COA process with the Seattle Landmarks Commission.

Mitigation measures for proposed changes to a landmark may include:

- Preservation of all or a portion of a structure
- Documentation of a structure that is to be removed
- Provision of interpretive information about historic structures that are removed as part of redevelopment
- Construction of a new building in keeping with the neighborhood's architectural character
- Modification of a building design to preserve views of a Landmark structure

Below-ground Resources

Those projects that have federal involvement or require SEPA review may necessitate completion of a cultural resources survey. These are typically conducted prior to construction. Should impacts to below-ground cultural resources be anticipated, avoidance and mitigation measures would be specific to the nature of the identified resources.

Those projects taking place within the Government Meander Line are subject to archaeological survey per SMC 25.05.675 H and Director's Rule 2-98. Under state law (RCW 27.53), prehistoric archaeological sites are protected in all cases. Historic archaeological sites must be determined eligible for listing in the

Washington Heritage Register (WHR) (RCW 27.34.220) or National Register of Historic Places (NRHP) before they are considered protected. DAHP would make a final determination whether the resource is eligible or not eligible for register listing. If a resource that is considered protected cannot be avoided, the project proponent must apply for an archaeological excavation permit from DAHP (WAC 25-48-060) to conduct any activity that disturbs the site. DAHP would then provide the archaeological excavation permit application for review to the appropriate stakeholders and Tribes.

OTHER PROPOSED MITIGATION MEASURES

As part of the Seattle Comprehensive Plan Update, Neighborhood Planning Element, the following goals and policies would promote new development that is consistent with the historic character of the neighborhood.

- Recognize and promote Queen Anne’s historic resources through such means as developing a Roy Street Conservation District, preserving and enhancing the historic Queen Anne Boulevard and providing information about and incentives to preserve residential structures.

The UDF recommendations include developing Uptown rezone legislation; implementing the following recommendation would promote new development that is consistent with the historic character of the neighborhood.

- The preservation of landmarks through transfer of development rights.

Additional mitigation could include establishing a process for identifying and nominating structures for Landmark listing for projects that fall under established SEPA review thresholds. This would ensure that any structure that is subject to demolition has been assessed for Landmark eligibility and allow opportunity to identify appropriate mitigation before demolition occurs.

3.5.4 SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

Both Alternatives 2 and 3 establish height increases and other zoning changes that could result in significant unavoidable adverse impacts to above-ground historic properties. These adverse impacts

would occur if redevelopment substantially impacts the character of an adjacent designated landmark, or if the development alters the setting of the landmark, and the setting is a key component of that landmark's eligibility. Redevelopment of potential landmarks could be a significant impact if the regulatory process governing the development does not require a consideration of that structure's eligibility as a Seattle City Landmark such as those projects under SEPA review thresholds. If mitigation requiring assessment of those structures were implemented, this impact could be avoided.

A significant impact may result from development of a site when that development does not require an assessment of below-ground cultural resources. However, it is assumed that any impact to a below-ground cultural resource would occur during construction and would be mitigated during the construction phase. Thus, significant unavoidable adverse impacts to below-ground cultural resources are considered unlikely.

EXHIBIT C



CITY OF SEATTLE
Office of Planning & Community Development

March 2017

A teal-tinted background image showing the Space Needle on the left, a cityscape in the middle ground, and mountains in the distance.

FINAL EIS /

UPTOWN
Uptown Urban Center Rezone

3.5 HISTORIC AND CULTURAL RESOURCES

IMPACTS OF THE PREFERRED ALTERNATIVE

Aboveground Resources

The Preferred Alternative provides for a mix of moderate height increases within the range of height increases considered under Alternatives 2 and 3, though with reduced heights in certain areas where historic properties are located. Increased height limits would occur on seven blocks containing National Register of Historic Places (NRHP), Washington Heritage Register (WHR), or Seattle City Landmark properties.

The majority of the register-listed structures in Uptown are in areas where, under the Preferred Alternative, no, or only minor height increases would occur. Still, the Preferred Alternative could affect some established or potential historic register properties, districts, or landmarks as a result of development pressure. Exhibit 3.5-1 identifies locations of historic properties on blocks proposed for increased height limits under the Preferred Alternative.

Exhibit 3.5-2 shows those properties in the Uptown Study Area that meet the minimum age threshold for consideration for listing in the NRHP or recognition as a Seattle City Landmark.

Impacts could include demolition of such properties, or inappropriate rehabilitation and re-use that could change the character and/or setting, or result in changes in the physical context (i.e., new construction adjacent or across the street). For example, the height limits of several blocks that include register or landmark-listed buildings are proposed to be raised between 10 and 75 feet, potentially altering some characteristic that make those properties eligible. One is the Marquee Apartment building on the northeast corner of Queen Anne Avenue N and Mercer Street (property 21 in Exhibit 3.5-4 of the Draft EIS). This is a three-story building approximately 35 feet tall. The building has been determined NRHP- and WHR-eligible based on its architectural character and siting on a prominent corner in the heart of Uptown. While less of a height increase compared to Alternatives 2 and 3, increasing adjacent height limits to 65 feet under the Preferred Alternative still has the potential to significantly impact the building's prominence and regard in the neighborhood.

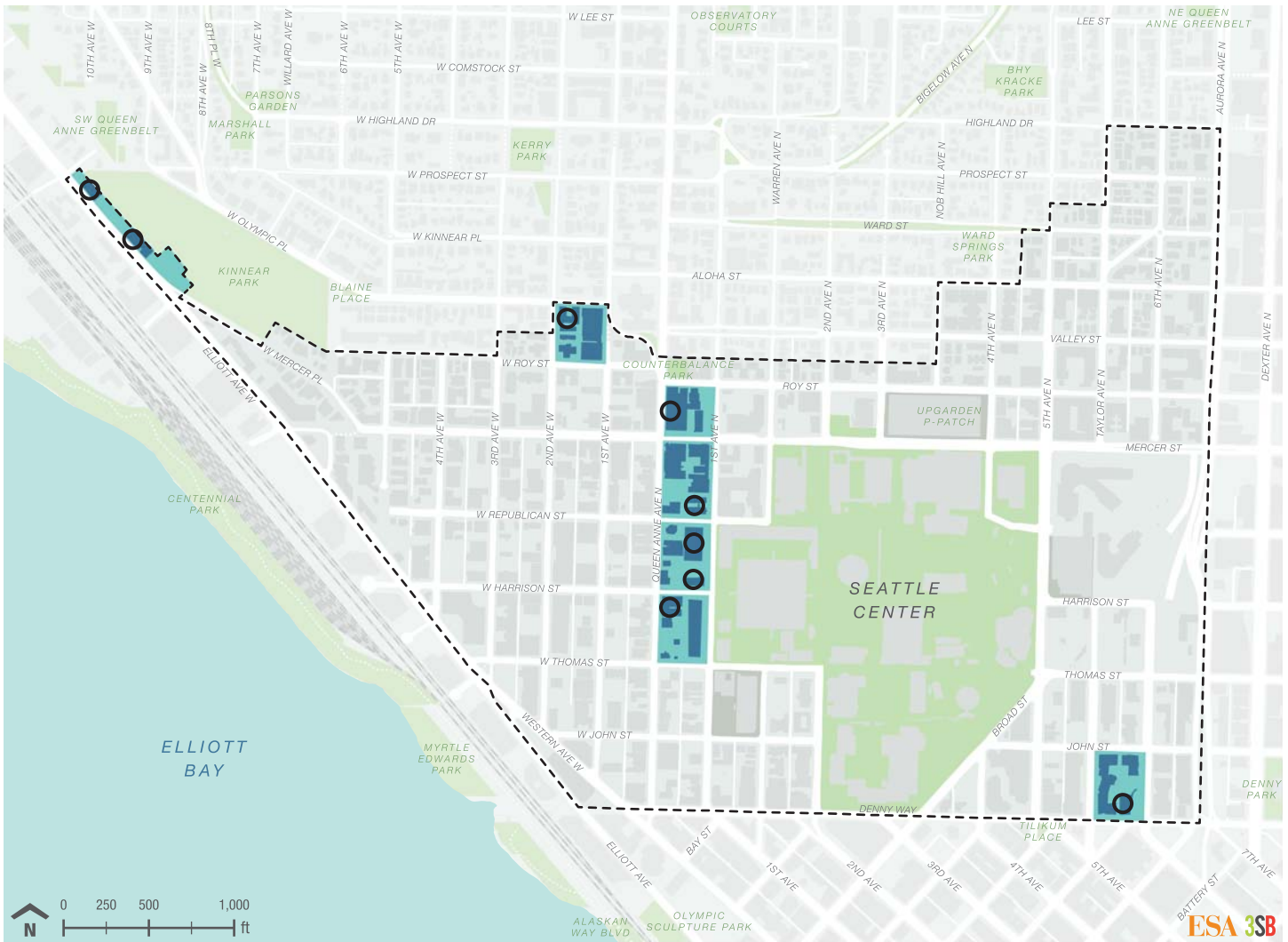


Exhibit 3.5-1 Locations of Historic Properties on Blocks Proposed for Increased Height Limits Under the Preferred Alternatives

- Urban Center Boundary
- Open Space and Recreation
- Seattle Center Management Area (Non Open Space and Recreation)
- Historic Properties on Blocks Proposed for Increased Height Limits Under Alternatives 2 and 3**
- Blocks with Register and/or Landmark-listed Properties
- Buildings on Blocks with Register and/or Landmark-listed Properties (2012)
- Historic Sites

Source: DAHP, 2010; Seattle Department of Neighborhoods, 2017

The potential for increased height limits to diminish the characteristics of the existing 50-foot tall Queen Anne Post Office would be the same as described for Alternative 2, where proposed height limits would increase from 65 to 85 feet. Compared to Alternative 3 where height limits would increase to 160 feet in this area, potential impacts would be considerably reduced under the Preferred Alternative.

In addition, under the Preferred Alternative the current heights would be maintained at the Seattle Center Campus. For a conservative analysis, increased heights of 10 feet are studied on the Seattle Center campus which has a number of designated historic properties. However, no redevelopable properties are identified in this analysis for the main Seattle Center campus under

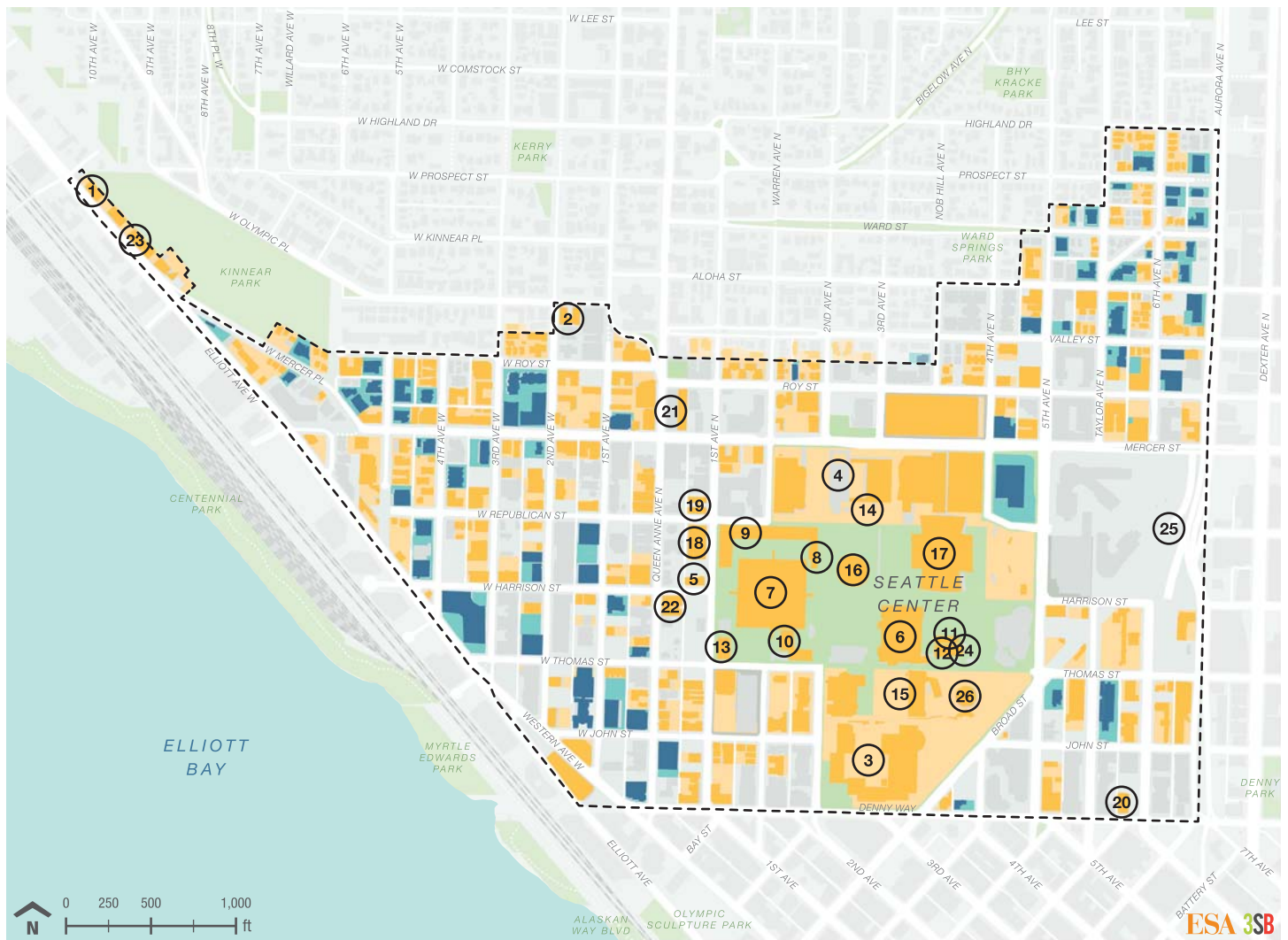


Exhibit 3.5-2 Register and Landmark-Listed and Potentially Register or Landmark-Eligible Properties

- Urban Center Boundary
- Open Space and Recreation
- Seattle Center Management Area (Non Open Space and Recreation)
- Register and Landmark-Listed and Potentially Register or Landmark-Eligible Properties**
- Meets minimum-age threshold for NRHP eligibility (50 years, pre-1967)
- Meets minimum-age threshold for SCL eligibility (25 years, pre-1992)
- Historic Sites

Source: DAHP, 2010; Seattle Department of Neighborhoods, 2016

any studied Alternative including the Preferred Alternative. Should redevelopment or alteration be proposed it would be subject to the regulations and commitments identified below. Further, such changes would need to be addressed in the Seattle Center Master Plan and evaluated appropriately under SEPA.

Because Seattle SEPA policies require investigation of the historic significance of structures over 25 years of age as part of project-level SEPA review (when required), rezoning may also encourage preservation efforts through the nomination of historic properties, districts, or landmarks. Owners of buildings listed in the NRHP are provided the opportunity receive federal investment tax credits, matching grant-in-aid funds for restoration, and free technical assistance from DAHP for the maintenance, rehabilitation, and

restoration of the property. For Seattle City Landmarks, incentives include special tax valuation, and zoning and building code relief.

While height increases under the Preferred Alternative in most areas are more modest than under Alternatives 2 or 3, there is potential that raising height limits within Uptown could obscure views or diminish the standing of register-listed or potentially register-eligible properties, particularly in regards to the Space Needle. These impacts may be reduced under the Preferred Alternative, particularly along the Mercer Corridor where height increases will go from 40 feet to 85 feet (as opposed to 85 or 160 feet under Alternatives 2 or 3), and the area immediately west of Seattle Center where increases would go from 65 to 85 feet (rather than 85 or 160 feet under Alternatives 2 or 3).

Belowground Resources

Redevelopment would occur under the Preferred Alternative. Any ground disturbance has the potential for significant, irreversible impacts to belowground cultural resources because of damage, destruction, or loss of integrity. Impacts would be the same as described for Alternatives 2 and 3, but would likely involve fewer areas of Uptown.

MITIGATION MEASURES

The mitigation identified in Draft EIS Section 3.5, Historic and Cultural Resources continue to apply to the Preferred Alternative. These included:

- Comprehensive Plan Policies that promote new development consistent with the historic character of Queen Anne Boulevard and suggest the creation of a conservation district to retain the art deco influenced multi-family housing along Roy Street.
- City regulations including the Seattle City Landmark process and archaeological surveys per the Seattle Municipal Code.

Additional mitigation identified for the Preferred Alternative includes development of a TDR program similar to the City's Pike/Pine TDR program, which would help to reduce impacts by providing incentives for property owners to retain existing historic structures. In addition, the Preferred Alternative includes removing SEPA review thresholds for purposes of determining landmark eligibility. This would ensure that any structure that is subject to demolition has been assessed for Landmark eligibility and allow opportunity to identify appropriate mitigation before demolition occurs.

SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

The Preferred Alternative establishes height increases and other zoning changes that could result in significant unavoidable adverse impacts to some aboveground historic properties, though in most areas there would be a reduced potential for adverse impacts compared to Alternative 3 and more graduated height increases compared to Alternative 2. These adverse impacts would occur if redevelopment substantially impacts the character of an adjacent designated landmark, or if the development alters the setting of the landmark, and the setting is a key component of that landmark's eligibility. Redevelopment of potential landmarks could be a significant impact if the regulatory process governing the development does not require a consideration of that structure's eligibility as a Seattle City Landmark such as for SEPA-exempt review. However, this impact could be avoided if mitigation requiring assessment of all structures, including for SEPA-exempt development were implemented.

A significant impact may result from development of a site when that development does not require an assessment of belowground cultural resources. However, it is assumed that any impact to a belowground cultural resource would occur during construction and would be mitigated during the construction phase. Thus significant unavoidable adverse impacts to belowground cultural resources are considered unlikely.

3.6 TRANSPORTATION

BACKGROUND

This section presents the multimodal transportation analysis performed with the proposed height and density rezone of the Uptown neighborhood. It presents existing transportation conditions in Uptown, as well as future (2035) conditions under two alternatives—No Action and the City's Preferred Alternative. Transportation impacts and potential mitigation measures are identified for each future alternative based on the policies and recommendations established in state, regional, and City plans.

Mode Split

Fundamental to the discussion of transportation is the mode of transportation used. The City of Seattle has set mode share targets