



Update of Directors' Rule addressing Transportation Management Programs

Seattle, Washington

SEPA Checklist

February 2, 2021

STATE ENVIRONMENTAL POLICY ACT (SEPA) ENVIRONMENTAL CHECKLIST

A. BACKGROUND

1. Name of proposed project, if applicable:

Update of Directors' Rule addressing Transportation Management Programs (TMPs)

2. Name of applicant:

City of Seattle, Department of Transportation (SDOT)

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

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4. Date checklist prepared:

February 2, 2021

5. Agency requesting checklist:

SDOT

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

The Update of Directors' Rule for Transportation Management Programs (TMPs) will go into effect in Q1 2021. TMPs that are recorded after the Update of Directors' Rule becomes effective would need to comply with the Updated Directors' Rule.

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.

None, except for the SEPA determination that will be prepared for this proposal. Additionally, a Determination of Non-Significance (DNS) was issued for 2015 updates to this Director's Rule. Furthermore, several citywide policy documents exist that describe the need to reduce emissions from the transportation sector, including the City's Climate Action Plan and Transportation Electrification Blueprint.

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.

None.

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

The Directors' Rule will require approval and signature from the SDOT director and the SDCI director.

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.)

The proposed update to the Director's Rule (DR) would:

- Explicitly connect the goals of TMPs to the City's transportation policy goals.
- Update the transportation mode share definition of a Single Occupancy Vehicle (SOV) trip to include any Transportation Network Company (TNC) vehicle or taxicab trip with one professional driver and one passenger, in addition to traditional SOV trips made in personally-owned vehicles. This update is necessary to account for the unanticipated growth of TNC trips since the prior publication of the last Directors' Rule update in 2015. Single passenger TNC trips contribute to Seattle congestion and carbon emissions in a similar manner to a traditional SOV trip, if not more so, and require as such in terms of TMP goal setting and performance monitoring, and are not currently captured in the DR.
- Clarify the applicability and related authority of when a particular development proposal is subject to a TMP, either through SEPA review or Seattle Municipal Code (SMC) requirements. These edits have been made to reflect changes made to the SMC since the publication of the last TMP Directors Rule in 2015. These changes have resulted in additional Code-based authority for TMPs, and this update to the Directors Rule clarifies these new pathways for TMP requirements.
- Clarify how TMPs interact with other City processes, namely a more detailed explanation of how TMPs, which are building-based Transportation Demand Management (TDM) strategies, interact with the State's Commute Trip Reduction (CTR) Law, which is the equivalent TDM programming on large employers. Additional edits and explanation are also included in this Directors Rule update around TMPs and their connection to design review, transportation modal plans, and the City's Climate Action Plan.

The edits also clarify that the Applicant / Responsible Party holds primary responsibility in reporting regular performance associated with the TMP (e.g. regular building tenant travel surveys and reporting on TMP programming, each of which typically occur every two years).

While the City has historically and is likely to continue providing tools to assist with this required reporting, it is ultimately the Applicant / Responsible Party's role to report transportation performance and program elements updates as part of fulfilling the terms of the TMP, on a continuing basis.

The edits also include updates to various TMP program elements, some of which are required for all TMPs, and others of which may be recommended. A significant update in this Directors Rule is a separate elements table, with accompanying narrative, for primarily residential projects. TMPs have historically been required of developments that are primarily commercial or mixed use in nature, however as a result of recent changes to the SMC, more and more buildings that are primarily residential are being required to complete and maintain a TMP as a condition of development. This Directors Rule update recognizes that residential buildings have unique needs, and as a result some elements which may be required for primarily commercial or mixed use projects are listed as "may be recommended" for primarily residential buildings.

Additional edits on program elements include a reduction in the number of items in the table of potential elements, to simplify the process for developing a TMP, and to reflect current thinking in TDM and the effectiveness of particular strategies in limiting SOV trips. Throughout the sections that explain the rationale for various TMP elements, these narratives have been updated to better articulate current thinking around how an element may be applicable to a given development, and additional considerations that should be noted on how an element will contribute to meeting a TMP performance goal.

Additionally, some new suggested TMP program elements have been introduced that reflect trends in urban mobility over the last 5 years since the previous Directors Rule update. These include options to better support the City's transportation electrification initiatives, the increasing use of walking and biking as a common travel mode and benefits of providing incentives or programs to encourage walking and biking trips, and the increasing availability of shared micromobility options (dockless bike share and scooter share), which have since replaced the City's former dock-based Pronto bike share system that was in place when the TMP Directors Rule was last updated in 2015.

The edits provide clarity and updates to the process for recording a finalized TMP, and the steps necessary for an Applicant / Responsible Party to do so. These include working with relevant SDCI and SDOT staff on elements of the TMP, review of a draft TMP document, and formalizing a new procedure adopted as a result of COVID-19 which allows for electronic signatures. As previously required, a final TMP must be recorded by the Applicant / Responsible Party with the King County Records and Elections Division, and a final recorded document must then be furnished to the City.

Edits have been made to provide significantly more detail on the process for TMP reporting and compliance monitoring. While prior typical requirements will remain in place (regular program reporting and surveying of travel behavior of building tenants), this section now provides the Applicant / Responsible Party a clear understanding of the various steps involved, and what the Applicant / Responsible Party is responsible for in reporting its performance to the City. It also states that TMP sites that illustrate consistent achievement of long-term SOV goals may be granted an allowance for reduced requirements for Surveying and/or Program Reporting, subject to the discretion of SDCI and SDOT. This

would include projects that are Primarily Residential, which will not typically be subject to the same routine bi-annual tenant surveying as other TMP buildings, as the City recognizes the challenges of reaching residential populations for travel surveying.

Edits have been made to clarify when a TMP may need to be revised, in particular if the Applicant / Responsible Party does not show progress in meeting applicable performance goals, or is non-compliant to terms of the TMP, including a failure to submit required surveying or program reporting.

Finally, the Directors' Rule has been updated to better define a Transportation Management Association (TMA) and how a TMP site must demonstrate participation in activities offered by a TMA. Currently, the local TMA serving all TMP sites in Seattle is Commute Seattle.

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 proposal affects development proposals in many locations throughout Seattle, but in particular locations that accommodate larger developments (generally non-residential, though not entirely), where the SMC and/or SEPA review and related mitigation requires the preparation of a TMP. While this could include certain instances of TMPs being required in low density and residential zones due to permissible institutional uses, this is most likely relevant only to higher density zones across the city.

For TMPs that are required as a result of sections of the SMC, the following information is relevant:

- The Seattle Land Use and Zoning Code ("Title 23 SMC") contains requirements for certain projects to have a TMP, regardless of any SEPA environmental review findings. These include:
 - Major Institutions, see SMC 23.69
 - Certain SM-zoned areas, see; 23.48.021.D.2;
 - SM-SLU, see 23.48.230.F, 23.48.290;
 - SM-U, see 23.48.610;
 - SM-UP, see 23.48.710;
 - Northgate Overlay District, see SMC 23.71;
 - Downtown zones except for Pike Market Mixed zones, see 23.49.019.J and
 - Transportation Impact Mitigation for certain proposals not subject to SEPA environmental review, see SMC 23.52.008.

B. ENVIRONMENTAL ELEMENTS

1. Earth

a. General description of the site:

This non-project proposed update of the Directors' Rule addressing TMPs would affect development proposals in many locations throughout Seattle. Seattle consists of flat, rolling, hilly, and steep slopes. All potential sites affected by this non-project proposal would occur adjacent to and have required elements that occasionally fall within the public right-of-way.

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

This non-project proposal applies to an Update of the Directors' Rule addressing TMPs, which affect development proposals in many locations throughout Seattle, but in particular locations that accommodate larger developments (generally non-residential, though not entirely), where the SMC and/or SEPA review and related mitigation requires the preparation of a TMP. All potential sites proposed by this non-project proposal would occur adjacent to and have required elements that occasionally fall within the public right-of-way, which contains slopes that generally range from flat to above 20%. There are no restrictions unique to TMPs specific 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.

This non-project proposal applies to an Update of the Directors' Rule addressing TMPs, which affect development proposals in many locations throughout Seattle, but in particular locations that accommodate larger developments (generally non-residential, though not entirely), where the SMC and/or SEPA review and related mitigation requires the preparation of a TMP. This non-project proposal is not linked to any particular independent future development proposal, and this non-project proposal does not authorize construction. There are numerous types of soils found throughout the public rights-of-way, but none are agricultural or of long-term commercial significance.

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

There are indications and a history of unstable soils in certain locations within public right-of-way. These locations have been designated by the City as environmentally critical areas and are subject to development restrictions. This non-project proposal applies to an Update of the Directors' Rule addressing TMPs, which affect development proposals in many locations throughout Seattle, but in particular locations that accommodate larger developments (generally non-residential, though not entirely), where the SMC and/or SEPA review and related mitigation requires the preparation of a TMP. This non-project proposal is not linked to any particular independent future development proposal, and this non-project proposal does not authorize construction. Future individual development proposals may be within the immediate vicinity of unstable soils. Applications for development within or near unstable soils considered to be environmental critical areas must comply with SMC 25.09, and any authorization for construction in these areas would be independent and unrelated to TMP requirements.

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

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

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

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

This non-project proposal applies to an Update of the Directors' Rule addressing TMPs, which affect development proposals in many locations throughout Seattle, but in particular locations that accommodate larger developments (generally non-residential, though not entirely), where the SMC and/or SEPA review and related mitigation requires the preparation of a TMP. This non-project proposal is not linked to any particular independent future development proposal, and this non-project proposal does not authorize construction. Future individual proposals could involve ground disturbance and associated runoff. The City would require any future development proposals to comply

with the Stormwater Code and other applicable federal, state, and local regulations. This non-project proposal will not result in significant adverse impacts to earth resources.

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.**

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

There are no sources of emissions or odor that may affect this non-project proposal.

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

This non-project proposal applies to an Update of the Directors' Rule addressing TMPs, which affect development proposals in many locations throughout Seattle, but in particular locations that accommodate larger developments (generally non-residential, though not entirely), where the SMC and/or SEPA review and related mitigation requires the preparation of a TMP. This non-project proposal is not linked to any particular independent future development proposal, and this non-project proposal does not authorize construction. The City would require any future development proposals to comply with applicable federal, state, and local air quality regulations to minimize impacts. This non-project proposal will not result in significant adverse emissions or other impacts to air.

3. Water

- a. Surface:**

- 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.**

Several water bodies are near development sites and adjacent public right-of-way within the City of Seattle.

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.

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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.

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

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

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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.

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b. Ground:

1) Will ground water 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.

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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.

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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.

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

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

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

This non-project proposal applies to an Update of the Directors' Rule addressing TMPs, which affect development proposals in many locations throughout Seattle, but in particular locations that accommodate larger developments (generally non-residential, though not entirely), where the SMC and/or SEPA review and related mitigation requires the preparation of a TMP. This non-project proposal is not linked to any particular independent future development proposal, and this non-project proposal does not authorize construction. Future individual development proposals could involve ground disturbance. The City would require any future proposals to comply with the Stormwater Code and other applicable federal, state, and local regulations. This non-project proposal is intended to establish transportation demand management programming for completed buildings, and will not result in significant adverse surface water, groundwater or stormwater runoff impacts.

4. Plants

a. Types of vegetation found on the site: *[Check the applicable boxes]*

Deciduous tree: alder, maple, aspen, other

Evergreen tree: fir, cedar, pine, other

Shrubs

Grass

Pasture

Crop or grain

Wet soil plants: cattail, buttercup, bulrush, skunk cabbage, other

Water plants: water lily, eelgrass, milfoil, other

Other types of vegetation

Most terrestrial vegetation types listed above could be found in development sites along with the planting strip or other unpaved portions of the adjacent public right-of-way in the City of Seattle, where property development typically occurs.

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

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

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d. Proposed landscaping, use of native plants, or other measures to preserve or enhance vegetation on the site, if any:

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

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5. Animals

a. Birds and animals which have been observed on or near the site or are known to be on or near the site: [Check the applicable boxes]

Birds: Hawk Heron Eagle Songbirds

Other: (identify): Birds that are likely to be found in development site locations include common urban species such as crows, pigeons, doves, starlings, and house sparrows.

Mammals: Deer Bear Elk Beaver

Other:(identify): Mammals that may be found in development site locations would include rats, squirrels, and raccoons.

Fish: Bass Salmon Trout Herring

Shellfish Other: (identify) The proposal would not permit uses on the water.

Animals listed above could be found in the planting strip or other portions of the public right-of-way in the City of Seattle, along with adjacent private property, where development sites may be permitted.

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

Threatened or endangered species are not expected to be found within the public right-of-way or adjacent development sites.

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

Seattle's public right-of-way and adjacent development sites are developed and urban in character. Seattle is within the Pacific Flyway, one of the four principal north-south migration routes for birds (including Canada geese, herons, and other birds) in North America. The Pacific Flyway encompasses the entire Puget Sound Basin.

d. Proposed measures to preserve or enhance wildlife, if any:

This non-project proposal applies to an Update of the Directors' Rule addressing TMPs, which affect development proposals in many locations throughout Seattle, but in particular locations that accommodate larger developments (generally non-residential, though not entirely), where the SMC and/or SEPA review and related mitigation requires the preparation of a TMP. This non-project proposal is not linked to any particular independent future development proposal, and this non-project proposal does not authorize construction. Seattle's public right-of way and adjacent private property is developed and urban in character. Approval of development sites subject to the provisions of this non-project proposal are not expected to result in probable significant adverse impacts to birds, mammals, or fish; birds migrating along the Pacific Flyway; or threatened or endangered species.

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

Invasive species are not expected to be found in the vicinity of the public right-of-way or adjacent development sites.

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.

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

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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:

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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.

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

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residential, though not entirely), where the SMC and/or SEPA review and related mitigation requires the preparation of a TMP. This non-project proposal is not linked to any particular independent future development proposal, and this non-project proposal does not authorize construction. Future individual development proposals may require construction activity within a known or possible contaminated site.

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.

This non-project proposal applies to an Update of the Directors' Rule addressing TMPs, which affect development proposals in many locations throughout Seattle, but in particular locations that accommodate larger developments (generally non-residential, though not entirely), where the SMC and/or SEPA review and related mitigation requires the preparation of a TMP. This non-project proposal is not linked to any particular independent future development proposal, and this non-project proposal does not authorize construction. Future individual development proposals may be affected by existing hazardous chemicals/conditions.

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 non-project proposal applies to an Update of the Directors' Rule addressing TMPs, which affect development proposals in many locations throughout Seattle, but in particular locations that accommodate larger developments (generally non-residential, though not entirely), where the SMC and/or SEPA review and related mitigation requires the preparation of a TMP. This non-project proposal is not linked to any particular independent future development proposal, and this non-project proposal does not authorize construction. Future individual development proposals may require construction activity that produces or releases toxic or hazardous substances, such as mechanical fluids.

4) Describe special emergency services that might be required.

This non-project proposal applies to an Update of the Directors' Rule addressing TMPs, which affect development proposals in many locations throughout Seattle, but in particular locations that accommodate larger developments (generally non-residential, though not entirely), where the SMC and/or SEPA review and related mitigation requires the preparation of a TMP. This non-project proposal is not linked to any particular independent future development proposal, and this non-project proposal does not authorize construction. Future individual development proposals may result in an increased need for emergency medical services, Seattle Police Department, or Seattle Fire Department.

5) Proposed measures to reduce or control environmental health hazards, if any:

This non-project proposal applies to an Update of the Directors' Rule addressing TMPs, which affect development proposals in many locations throughout Seattle, but in particular locations that accommodate larger developments (generally non-

residential, though not entirely), where the SMC and/or SEPA review and related mitigation requires the preparation of a TMP. This non-project proposal is not linked to any particular independent future development proposal, and this non-project proposal does not authorize construction. Future individual development proposals may have the potential to result in environmental health hazards. Any environmental hazards of individual development sites would be addressed during review of site-specific permit applications on a site-specific basis. The City would require any future development proposals to comply with applicable federal, state, and local regulations, however any potential significant environmental health hazards would be independent and unrelated to TMP requirements in this non-project proposal. This non-project proposal will not result in probable significant adverse environmental health impacts.

b. Noise

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

This non-project proposal applies to an Update of the Directors' Rule addressing TMPs, which affect development proposals in many locations throughout Seattle, but in particular locations that accommodate larger developments (generally non-residential, though not entirely), where the SMC and/or SEPA review and related mitigation requires the preparation of a TMP. This non-project proposal is not linked to any particular independent future development proposal, and this non-project proposal does not authorize construction. Ambient noise typical of urban areas exists in Seattle's public right-of-way and adjacent private property.

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 non-project proposal applies to an Update of the Directors' Rule addressing TMPs, which affect development proposals in many locations throughout Seattle, but in particular locations that accommodate larger developments (generally non-residential, though not entirely), where the SMC and/or SEPA review and related mitigation requires the preparation of a TMP. This non-project proposal is not linked to any particular independent future development proposal, and this non-project proposal does not authorize construction. Any noise generated by development activity adjacent to and within Seattle's public right-of-way would be independent and unrelated to TMP requirements in this non-project proposal.

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

This non-project proposal applies to an Update of the Directors' Rule addressing TMPs, which affect development proposals in many locations throughout Seattle, but in particular locations that accommodate larger developments (generally non-residential, though not entirely), where the SMC and/or SEPA review and related mitigation requires the preparation of a TMP. This non-project proposal is not linked to any particular independent future development proposal, and this non-project proposal does not authorize construction. Any individual development proposals would be required to comply with City noise standards (SMC 25.08), however any potential

significant environmental noise impacts would be independent and unrelated to TMP requirements in this non-project proposal. This non-project proposal will not result in probable significant adverse noise impacts.

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.

This non-project proposal applies to an Update of the Directors' Rule addressing TMPs, which affect development proposals in many locations throughout Seattle, but in particular locations that accommodate larger developments (generally non-residential, though not entirely), where the SMC and/or SEPA review and related mitigation requires the preparation of a TMP. This non-project proposal is not linked to any particular independent future development proposal, and this non-project proposal does not authorize construction. Any individual development proposals would result in a review of current and proposed land uses for the individual site and adjacent locations, independent and unrelated to TMP requirements in this non-project proposal. This non-project proposal would not result in any probable significant adverse land use impacts.

b. Has the 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 non-forest use?

This non-project proposal applies to development sites and adjacent portions of Seattle's public right-of-way, which does not contain working farmlands or forestlands.

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 non-project proposal applies to development sites and adjacent portions of Seattle's public right-of-way, which does not contain working farmlands or forestlands.

c. Describe any structures on the site.

This non-project proposal applies to development sites and adjacent portions of Seattle's public right-of-way. There are many structures existing within such locations.

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

This non-project proposal applies to development sites and adjacent portions of Seattle's public right-of-way. Future individual development proposals may require the demolition of structures on private property and/or within the public right-of-way.

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

This non-project proposal applies to development sites and adjacent portions of Seattle's public right-of-way. Zoning designations of future individual development sites vary, and the City of Seattle's rights-of-way are located adjacent to all City zoning designations.

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

This non-project proposal applies to development sites and adjacent portions of Seattle's public right-of-way. Comprehensive plan designations of future individual development sites vary, and the City of Seattle's rights-of-way are located adjacent to all City comprehensive plan designations.

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

This non-project proposal applies to development sites and adjacent portions of Seattle's public right-of-way, which is adjacent to or within all of Seattle's shoreline districts. Individual future development sites must comply with SMC 23.60A, Seattle Shoreline Master Program Regulations.

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

This non-project proposal applies to development sites and adjacent portions of Seattle's public right-of-way. Some of these locations are located in environmentally critical areas. Future individual development proposals may be located within or adjacent to environmental critical areas and must comply with SMC 25.09.

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

This non-project proposal applies to development sites and adjacent portions of Seattle's public right-of-way. Any change in residence or employment in such locations would vary based on any future individual development proposal.

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

This non-project proposal applies to development sites and adjacent portions of Seattle's public right-of-way. Any displacement impacts in such locations would vary based on any future individual development proposal, however this non-project proposal will not have displacement impacts.

k. Proposed measures to avoid or reduce displacement impacts, if any:

This non-project proposal applies to development sites and adjacent portions of Seattle's public right-of-way. Any displacement impacts in such locations would vary based on any future individual development proposal, and measures to avoid or reduce displacement impacts would be identified in the future by the City. However, this non-project proposal will not have displacement impacts.

l. Proposed measures to ensure the proposal is compatible with existing and projected land uses and plans, if any:

This non-project proposal applies to an Update of the Directors' Rule addressing TMPs, which affect development proposals in many locations throughout Seattle, but in particular locations that accommodate larger developments (generally non-residential, though not entirely), where the SMC and/or SEPA review and related mitigation requires the preparation of a TMP. This non-project proposal is not linked to any particular independent future development proposal, and this non-project proposal does not authorize construction. Any individual future development proposals would be evaluated to ensure they are compatible with existing and projected land uses and plans, however this would be independent and unrelated to TMP requirements in this non-project proposal.

m. Proposed measures to ensure that 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 non-project proposal applies to an Update of the Directors' Rule addressing TMPs, which affect development proposals in many locations throughout Seattle, but in particular locations that accommodate larger developments (generally non-residential, though not entirely), where the SMC and/or SEPA review and related mitigation requires the preparation of a TMP. This non-project proposal is not linked to any particular independent future development proposal, and this non-project proposal does not authorize construction. Any individual future development proposals would be evaluated for number of housing units and whether they would be high, middle and/or low-income housing, however this would be independent and unrelated to TMP requirements in this non-project proposal.

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

This non-project proposal applies to an Update of the Directors' Rule addressing TMPs, which affect development proposals in many locations throughout Seattle, but in particular locations that accommodate larger developments (generally non-residential, though not entirely), where the SMC and/or SEPA review and related mitigation requires the preparation of a TMP. This non-project proposal is not linked to any particular independent future development proposal, and this non-project proposal does not authorize construction. Any individual future development proposals would be evaluated for number of housing units that would be eliminated, and whether they would be high, middle and/or low-income housing, however this would be independent and unrelated to TMP requirements in this non-project proposal.

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

This non-project proposal applies to an Update of the Directors' Rule addressing TMPs, which affect development proposals in many locations throughout Seattle, but in particular locations that accommodate larger developments (generally non-residential,

though not entirely), where the SMC and/or SEPA review and related mitigation requires the preparation of a TMP. This non-project proposal is not linked to any particular independent future development proposal, and this non-project proposal does not authorize construction. Any individual future development proposals would be evaluated for housing impacts and proposed measures to control them, however this would be independent and unrelated to TMP requirements in this non-project proposal.

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 non-project proposal applies to an Update of the Directors' Rule addressing TMPs, which affect development proposals in many locations throughout Seattle, but in particular locations that accommodate larger developments (generally non-residential, though not entirely), where the SMC and/or SEPA review and related mitigation requires the preparation of a TMP. This non-project proposal is not linked to any particular independent future development proposal, and this non-project proposal does not authorize construction. The height of any new structure(s) would be evaluated within any future independent development proposal, however this would be independent and unrelated to TMP requirements in this non-project proposal.

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

This non-project proposal applies to an Update of the Directors' Rule addressing TMPs, which affect development proposals in many locations throughout Seattle, but in particular locations that accommodate larger developments (generally non-residential, though not entirely), where the SMC and/or SEPA review and related mitigation requires the preparation of a TMP. This non-project proposal is not linked to any particular independent future development proposal, and this non-project proposal does not authorize construction. Changes in views in the immediate vicinity of any new structure(s) would be evaluated within any future independent development proposal, however this would be independent and unrelated to TMP requirements in this non-project proposal.

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

This non-project proposal applies to an Update of the Directors' Rule addressing TMPs, which affect development proposals in many locations throughout Seattle, but in particular locations that accommodate larger developments (generally non-residential, though not entirely), where the SMC and/or SEPA review and related mitigation requires the preparation of a TMP. This non-project proposal is not linked to any particular independent future development proposal, and this non-project proposal does not authorize construction. Any individual future development proposals would be evaluated for aesthetic impacts and proposed measures to control them, however this would be independent and unrelated to TMP requirements in this non-project proposal. The non-project proposal would not result in any probable significant adverse aesthetic impacts.

11. Light and glare

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

This non-project proposal applies to an Update of the Directors' Rule addressing TMPs, which affect development proposals in many locations throughout Seattle, but in particular locations that accommodate larger developments (generally non-residential, though not entirely), where the SMC and/or SEPA review and related mitigation requires the preparation of a TMP. This non-project proposal is not linked to any particular independent future development proposal, and this non-project proposal does not authorize construction. The expected light or glare production would be evaluated within any future independent development proposal, however this would be independent and unrelated to TMP requirements in this non-project proposal.

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

This non-project proposal applies to an Update of the Directors' Rule addressing TMPs, which affect development proposals in many locations throughout Seattle, but in particular locations that accommodate larger developments (generally non-residential, though not entirely), where the SMC and/or SEPA review and related mitigation requires the preparation of a TMP. This non-project proposal is not linked to any particular independent future development proposal, and this non-project proposal does not authorize construction. The expected light or glare impacts of a finished project would be evaluated within any future independent development proposal, however this would be independent and unrelated to TMP requirements in this non-project proposal.

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

Ambient light and glare typical of urban areas presently exist in Seattle's right-of-way and adjacent private property, and will not affect the proposal.

d. Proposed measures to reduce or control light and glare impacts, if any:

This non-project proposal applies to an Update of the Directors' Rule addressing TMPs, which affect development proposals in many locations throughout Seattle, but in particular locations that accommodate larger developments (generally non-residential, though not entirely), where the SMC and/or SEPA review and related mitigation requires the preparation of a TMP. This non-project proposal is not linked to any particular independent future development proposal, and this non-project proposal does not authorize construction. Any individual future development proposals would be evaluated for light and glare impacts and proposed measures to control them, however this would be independent and unrelated to TMP requirements in this non-project proposal. This non-project proposal will not result in probable significant adverse light or glare impacts.

12. Recreation

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

Throughout Seattle, there are parks and other designated and informal recreational opportunities within and near Seattle's public right-of-way areas, and adjacent to private property and development sites.

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

This non-project proposal applies to an Update of the Directors' Rule addressing TMPs, which affect development proposals in many locations throughout Seattle, but in particular locations that accommodate larger developments (generally non-residential, though not entirely), where the SMC and/or SEPA review and related mitigation requires the preparation of a TMP. This non-project proposal is not linked to any particular independent future development proposal, and this non-project proposal does not authorize construction. Future individual development proposals would be evaluated for potential displacement of existing recreational uses, however this would be independent and unrelated to TMP requirements in this non-project proposal.

c. Proposed measures to reduce or control impacts on recreation, including recreation opportunities to be provided by the project or applicant, if any:

This non-project proposal applies to an Update of the Directors' Rule addressing TMPs, which affect development proposals in many locations throughout Seattle, but in particular locations that accommodate larger developments (generally non-residential, though not entirely), where the SMC and/or SEPA review and related mitigation requires the preparation of a TMP. This non-project proposal is not linked to any particular independent future development proposal, and this non-project proposal does not authorize construction. Future individual development proposals would be evaluated on measures to reduce or control impacts on recreation, however this would be independent and unrelated to TMP requirements in this non-project proposal. This non-project proposal will not result in probable significant adverse recreation impacts.

13. Historic and cultural preservation

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

There are eight historic districts and over 350 designated landmarks within the City of Seattle. Private property within Seattle and Seattle's rights-of-way lie within historic districts and contain or abut designated landmarks.

b. Are there any landmarks, features, or other evidence of Indian or historic use of 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.

This non-project proposal applies to an Update of the Directors' Rule addressing TMPs, which affect development proposals in many locations throughout Seattle, but in particular locations that accommodate larger developments (generally non-residential, though not entirely), where the SMC and/or SEPA review and related mitigation requires the preparation of a TMP. This non-project proposal is not linked to any particular independent future development proposal, and this non-project proposal does not authorize construction. Future individual development proposals would be evaluated for elements of historic, archaeological, scientific, or cultural importance, however this would be independent and unrelated to TMP requirements in this non-project proposal.

- 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 Archaeology and Historic Preservation, archaeological surveys, historic maps, GIS data, etc.**

This non-project proposal applies to an Update of the Directors' Rule addressing TMPs, which affect development proposals in many locations throughout Seattle, but in particular locations that accommodate larger developments (generally non-residential, though not entirely), where the SMC and/or SEPA review and related mitigation requires the preparation of a TMP. This non-project proposal is not linked to any particular independent future development proposal, and this non-project proposal does not authorize construction. Future individual development proposals would be evaluated for elements of historic, archaeological, scientific, or cultural importance and methods to assess potential impacts to them, however this would be independent and unrelated to TMP requirements in this non-project proposal.

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

This non-project proposal applies to an Update of the Directors' Rule addressing TMPs, which affect development proposals in many locations throughout Seattle, but in particular locations that accommodate larger developments (generally non-residential, though not entirely), where the SMC and/or SEPA review and related mitigation requires the preparation of a TMP. This non-project proposal is not linked to any particular independent future development proposal, and this non-project proposal does not authorize construction. If future individual development proposals are found to have impacts on elements of historic, archaeological, scientific, or cultural importance, proposed measures to avoid, minimize or compensate for their loss, change or disturbance would be identified at that time. However, this would be independent and unrelated to TMP requirements in this non-project proposal. This non-project proposal will not result in probable significant adverse impacts to historic and cultural preservation.

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.

Seattle's right-of-way is composed of the existing street system, sidewalks, alleys, parking, and aboveground and belowground utilities and other structures such as bicycle racks and signage. This non-project proposal applies to an Update of the Directors' Rule addressing TMPs, which affect development proposals in many locations throughout Seattle, but in particular locations that accommodate larger developments (generally non-residential, though not entirely), where the SMC and/or SEPA review and related mitigation requires the preparation of a TMP. This non-project proposal is not linked to any particular independent future development proposal, and this non-project proposal does not authorize construction.

Future individual development proposals would be located adjacent to the public right-of-way, and include access plans to the existing street system. While such individual development proposals would be expected to impact the street system, this would be independent and mostly unrelated to TMP requirements in this non-project proposal. Occasionally, a TMP requirement for an individual development proposal would trigger a change in access from the development site to the existing street system; however this impact would be evaluated within the context of individual development site plan review by the City.

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?

Seattle's public right-of-way is served by multiple public transit agencies including King County Metro, Sound Transit, and Community Transit. This non-project proposal applies to an Update of the Directors' Rule addressing TMPs, which affect development proposals in many locations throughout Seattle, but in particular locations that accommodate larger developments (generally non-residential, though not entirely), where the SMC and/or SEPA review and related mitigation requires the preparation of a TMP. This non-project proposal is not linked to any particular independent future development proposal, and this non-project proposal does not authorize construction.

Future individual development proposals may be located adjacent to public transit services. While such individual development proposals would be evaluated for their proximity to public transit, a majority of TMP requirements for such developments under this non-project proposal would involve encouraging the use of public transit by building tenants.

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

This non-project proposal applies to an Update of the Directors' Rule addressing TMPs, which affect development proposals in many locations throughout Seattle, but in particular locations that accommodate larger developments (generally non-residential, though not entirely), where the SMC and/or SEPA review and related mitigation requires the preparation of a TMP. This non-project proposal is not linked to any particular

independent future development proposal, and this non-project proposal does not authorize construction.

Future individual development proposals may result in new parking or the removal of parking, depending on their location within the City and accompanying SMC regulations regarding parking. While such individual development proposals would be evaluated individually for parking and related impacts, a majority of TMP requirements for such developments under this non-project proposal would involve active parking management to ensure the goals of a TMP around reducing SOV trips are achieved.

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 non-project proposal applies to an Update of the Directors' Rule addressing TMPs, which affect development proposals in many locations throughout Seattle, but in particular locations that accommodate larger developments (generally non-residential, though not entirely), where the SMC and/or SEPA review and related mitigation requires the preparation of a TMP. This non-project proposal is not linked to any particular independent future development proposal, and this non-project proposal does not authorize construction.

Future individual development proposals would be evaluated on required improvements to roads or streets. In some cases, such improvements would be memorialized as part of an adopted TMP (e.g. bicycle parking installed by the applicant for public use in or adjacent to the public right of way) however the requirement to make such improvements is typically negotiated as part of site development review outside of the adoption of a TMP. As a result, this non-project proposal does not explicitly require new or 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.

This non-project proposal applies to an Update of the Directors' Rule addressing TMPs, which affect development proposals in many locations throughout Seattle, but in particular locations that accommodate larger developments (generally non-residential, though not entirely), where the SMC and/or SEPA review and related mitigation requires the preparation of a TMP. This non-project proposal is not linked to any particular independent future development proposal, and this non-project proposal does not authorize construction. Future individual development proposals may be expected to affect water, rail, or air 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 non-passenger vehicles). What data or transportation models were used to make these estimates?

This non-project proposal applies to an Update of the Directors' Rule addressing TMPs, which affect development proposals in many locations throughout Seattle, but in particular locations that accommodate larger developments (generally non-residential,

though not entirely), where the SMC and/or SEPA review and related mitigation requires the preparation of a TMP. This non-project proposal is not linked to any particular independent future development proposal, and this non-project proposal does not authorize construction.

Future individual development proposals may result in impacts to vehicular and/or freight travel patterns. While such individual development proposals would be evaluated individually for traffic related impacts, a majority of TMP requirements for such developments under this non-project proposal would involve programming and site design to limit the number of vehicle trips generated by the development site.

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 non-project proposal applies to an Update of the Directors' Rule addressing TMPs, which affect development proposals in many locations throughout Seattle, but in particular locations that accommodate larger developments (generally non-residential, though not entirely), where the SMC and/or SEPA review and related mitigation requires the preparation of a TMP. This non-project proposal is not linked to any particular independent future development proposal, and this non-project proposal does not authorize construction. It is unlikely that any future individual development proposal within Seattle would interfere with movement of agricultural and forest products.

h. Proposed measures to reduce or control transportation impacts, if any:

This non-project proposal applies to an Update of the Directors' Rule addressing TMPs, which affect development proposals in many locations throughout Seattle, but in particular locations that accommodate larger developments (generally non-residential, though not entirely), where the SMC and/or SEPA review and related mitigation requires the preparation of a TMP. This non-project proposal is not linked to any particular independent future development proposal, and this non-project proposal does not authorize construction.

If future individual development proposals are found to have impacts on transportation, proposed measures to reduce or control the impacts would be identified at that time. Notably, the requirement of a TMP for an individual development proposal, is a mitigation measure to control certain transportation impacts – the requirements of a TMP are centered on programming to reduce SOV trips and associated congestion impacts.

However, any explicit measures to reduce or control transportation impacts at the individual project level are independent and unrelated to TMP requirements in this non-project proposal. This non-project proposal will not result in probable significant adverse impacts to transportation.

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 non-project proposal applies to an Update of the Directors' Rule addressing TMPs, which affect development proposals in many locations throughout Seattle, but in particular locations that accommodate larger developments (generally non-residential, though not entirely), where the SMC and/or SEPA review and related mitigation requires the preparation of a TMP. This non-project proposal is not linked to any particular independent future development proposal, and this non-project proposal does not authorize construction. Future individual development proposals would be evaluated for their increased need for Seattle Fire Department, Seattle Police Department, SDOT, or Seattle-King County Department of Public Health services.

b. Proposed measures to reduce or control direct impacts on public services, if any.

This non-project proposal applies to an Update of the Directors' Rule addressing TMPs, which affect development proposals in many locations throughout Seattle, but in particular locations that accommodate larger developments (generally non-residential, though not entirely), where the SMC and/or SEPA review and related mitigation requires the preparation of a TMP. This non-project proposal is not linked to any particular independent future development proposal, and this non-project proposal does not authorize construction. Future individual development proposals would be evaluated for measures to reduce or control impacts on public services. However, this would be independent and unrelated to TMP requirements in this non-project proposal. This non-project proposal will not result in probable significant adverse impacts on public services.

16. Utilities

a. Utilities currently available at the site, if any: [Check the applicable boxes]

- None
 Electricity Natural gas Water Refuse service
 Telephone Sanitary sewer Septic system
 Other (identify)

Seattle's private properties and adjacent public right-of-way is extensively developed and is served by all the utilities listed above. Other utilities available include other communications services, cable television, and Internet access.

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 non-project proposal applies to an Update of the Directors' Rule addressing TMPs, which affect development proposals in many locations throughout Seattle, but in particular locations that accommodate larger developments (generally non-residential, though not entirely), where the SMC and/or SEPA review and related mitigation requires the preparation of a TMP. This non-project proposal is not linked to any particular independent future development proposal, and this non-project proposal does not authorize construction. Future individual development proposals will require various utilities. However, this would be independent and unrelated to TMP requirements in this

non-project proposal. This non-project proposal will not result in probable significant adverse impacts on utilities.

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: *Ben Rosenblatt*

Date Submitted: February 2, 2021

D. SUPPLEMENTAL SHEET FOR NON-PROJECT 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?

The proposal would not likely cause significant or adverse increases in potential for discharges to water, emissions to air, release of toxic or hazardous substances, or noise generation. Rather, by enabling more efficiently defined and effective TMPs it would be likely to help moderate the patterns of transportation by TMP-affected buildings and their tenants, by reducing the frequency of single-occupant vehicle travel, and supporting increased use of transit, walking, bicycling, etc., which would tend to reduce the potential for worst-case impacts to water, air and release of toxics hazards and noise generation. This is due in part to the general contributions of vehicle traffic to air pollution, and water pollution (through runoff), which are likely to be indirectly reduced through the implementation of this proposal.

Proposed measures to avoid or reduce such increases are:

This non-project proposal is not linked to any particular independent future development proposal. If future individual development proposals are found to have impacts on discharges to water, emissions to air, production, storage or release of toxic or hazardous substances, or production of noise, proposed measures to reduce or control the impacts would be identified at that time.

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

Similar to the rationales expressed in the response to question #D.1, the proposal would not likely cause significant or adverse increases in potential impacts upon plants, animals, fish, or marine life.

Proposed measures to protect or conserve plants, animals, fish, or marine life are:

This non-project proposal is not linked to any particular independent future development proposal. If future individual development proposals are found to have impacts on plants, animals, fish or marine life, proposed measures to reduce or control the impacts would be identified at that time.

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

Similar to the rationales expressed in the response to question #D.1, the proposal would not likely cause significant or adverse increases in potential impacts relating to energy depletion or natural resources.

Proposed measures to protect or conserve energy and natural resources are:

This non-project proposal is not linked to any particular independent future development proposal. If future individual development proposals are found to have impacts on energy or natural resources, proposed measures to reduce or control the impacts would be identified at that time.

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, flood plains, or prime farmlands?

Similar to the rationales expressed in the response to question #D.1, the proposal would not likely cause significant or adverse increases in potential impacts relating to these kinds of sensitive areas designated for governmental protection.

Proposed measures to protect such resources or to avoid or reduce impacts are:

This non-project proposal is not linked to any particular independent future development proposal. If future individual development proposals are found to have impacts on environmentally sensitive areas or resources, proposed measures to reduce or control the impacts would be identified at that time.

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?

This proposal improves explanations about the rationale for, and details about, numerous particular elements of TMPs. Most of these relate to programmatic details about the future definition and implementing of strategies that will be used to encourage use of alternatives to single-occupant vehicle driving for transportation purposes. Most of these details would have no bearing on land and shoreline uses, or changes to potential environmental impacts of future development itself. Guidance that encourages less parking for vehicles in a TMP could in operation lead to positive impacts, by encouraging reduced levels of traffic impacts and lesser physical impacts of development upon the urban environment than would otherwise occur. These types of differences, conceptually, could assist in allowing a future development to be designed in a manner that is more compatible with the land use patterns and activities present in its surroundings. Furthermore, a majority of strategies that would be required by an individual TMP that decrease levels of single occupancy vehicle use are in fact in line with existing plans and policies in place in the City of Seattle, including but not limiting to the Comprehensive Plan, Transportation Modal Master Plans (e.g. Transit, Bicycle, Pedestrian), and the Climate Action Plan. This proposal will not result in probable adverse land use impacts.

More specifically, this proposal affects development proposals in many locations throughout Seattle, but in particular locations that accommodate larger developments (generally non-residential, though not entirely), where the SMC and/or SEPA review and related mitigation requires the preparation of a TMP. While this could include certain instances of TMPs being required in low density and residential zones, due to permissible institutional uses, this is most likely relevant only to higher density zones across the city.

For TMPs that are required as a result of sections of the SMC, the following information is relevant:

- The Seattle Land Use and Zoning Code (“Title 23 SMC”) contains requirements for certain projects to have a TMP, regardless of any SEPA environmental review findings. These include:
 - Major Institutions, see SMC 23.69
 - Certain SM-zoned areas, see; 23.48.021.D.2;
 - SM-SLU, see 23.48.230.F, 23.48.290;
 - SM-U, see 23.48.610;
 - SM-UP, see 23.48.710;
 - Northgate Overlay District, see SMC 23.71;
 - Downtown zones except for Pike Market Mixed zones, see 23.49.019.J and
 - Transportation Impact Mitigation for certain proposals not subject to SEPA environmental review, see SMC 23.52.008.

Proposed measures to avoid or reduce shoreline and land use impacts are:

Any individual future development proposals would be evaluated to ensure they are compatible with existing and projected land uses and plans, however this would be independent and unrelated to TMP requirements in this non-project proposal.

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

Similar to the rationales expressed in the response to question #D.1, the proposal would not likely cause significant or adverse increases in potential impacts relating to these elements of the environment, particularly for public services and utilities.

For transportation, contributions of a well-defined TMP program could help lead to more efficiently designed buildings that limit and reduce the extent of potential impacts on transportation systems. Notably, requiring a TMP for an individual development proposal is a manner in which to control certain transportation impacts – the requirements of a TMP are centered on programming to reduce SOV trips and associated congestion impacts. Notwithstanding, any explicit measures to reduce or control transportation impacts at the individual project level are independent and unrelated to TMP requirements in this non-project proposal. This non-project proposal will not result in probable significant adverse impacts to transportation.

Proposed measures to reduce or respond to such demand(s) are:

This non-project proposal is not linked to any particular independent future development proposal. If future individual development proposals are found to have impacts on transportation, public services or utilities, proposed measures to reduce or control the impacts would be identified at that time.

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

The proposed updates to the Directors Rule would avoid conflicts with local, state or federal laws and requirements for protection of the environment.