

# SEPA ENVIRONMENTAL CHECKLIST

## **Purpose of checklist**

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

## **Instructions for applicants**

This environmental checklist asks you to describe some basic information about your proposal. Please answer each question accurately and carefully, to the best of your knowledge. You may need to consult with an agency specialist or private consultant for some questions. **You may use “not applicable” or “does not apply” only when you can explain why it does not apply and not when the answer is unknown.** You may also attach or incorporate by reference additional studies reports. Complete and accurate answers to these questions often avoid delays with the SEPA process as well as later in the decision-making process.

The checklist questions apply to **all parts of your proposal**, even if you plan to do them over a period of time or on different parcels of land. Attach any additional information that will help describe your proposal or its environmental effects. The agency to which you submit this checklist may ask you to explain your answers or provide additional information reasonably related to determining if there may be significant adverse impact.

## **Instructions for lead agencies**

Please adjust the format of this template as needed. Additional information may be necessary to evaluate the existing environment, all interrelated aspects of the proposal and an analysis of adverse impacts. The checklist is considered the first but not necessarily the only source of information needed to make an adequate threshold determination. Once a threshold determination is made, the lead agency is responsible for the completeness and accuracy of the checklist and other supporting documents.

## **Use of checklist for nonproject proposals**

For nonproject proposals (such as ordinances, regulations, plans and programs), complete the applicable parts of sections A and B, plus the [Supplemental Sheet for Nonproject Actions \(Part D\)](#). Please completely answer all questions that apply and note that the words "project," "applicant," and "property or site" should be read as "proposal," "proponent," and "affected geographic area," respectively. The lead agency may exclude (for non-projects) questions in “Part B: Environmental Elements” that do not contribute meaningfully to the analysis of the proposal.

## **A. Background** [Find help answering background questions](#)

### **1. Name of proposed project, if applicable:**

Belltown Lodging Use Flexibility

### **2. Name of applicant:**

City of Seattle Office of Planning & Community Development

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

City of Seattle, Office of Planning and Community Development

600 Fourth Avenue

P.O. Box 94788

Seattle, Washington 98124-7088

Contact: Rawan Hasan [Rawan.Hasan@Seattle.gov](mailto:Rawan.Hasan@Seattle.gov)

### **4. Date checklist prepared:**

June 13, 2023

### **5. Agency requesting checklist:**

City of Seattle Office of Planning and Community Development

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

The proposed Belltown legislation will be discussed and possibly voted on by the City Council in the summer and fall of 2023.

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

No, the proposal is a non-project action that is not dependent upon any further action.

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

This SEPA environmental checklist has been prepared for this proposal. A Director's Report is also prepared for the proposed legislation.

### **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.**

Applications prior to the adoption of this legislation will follow the existing development standards by the current designated zoning. There is one known pending application for development in the proposal area. It is possible that the pending development application could be modified by the applicant if the proposed legislation is adopted.

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

The proposal requires approval by the City Council. No other agency approvals are anticipated.

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

This is a non-project proposal that modifies land use code text. Lodging use would be exempted from chargeable floor area in the DMR/R 95/65 zone, treating lodging uses the same way that residential uses are regulated in the zone. Lodging uses are currently subject to a commercial floor area ratio (FAR) limitation of 1.5. No other development standards or allowable use standards would be modified by the legislation.

**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 is a non-project action. The legislation would affect the DMR/R 95/65 zone, which is mapped in one place within the city. The DMR/R 95/65 zone is located on approximately 8 blocks in the Belltown portion of the Downtown Urban Center. This zoning area is defined by Wall Street to the north, Lenora Street to the south and the alleys between 3<sup>rd</sup> Avenue and 2<sup>nd</sup> Avenue to east and 1<sup>st</sup> Avenue and Western Avenue to the west.

## B. Environmental Elements

### 1. Earth [Find help answering earth questions](#)

#### a. General description of the site:

The affected area by the proposal has diversity of site conditions consistent with urbanized areas.

**Circle or highlight one: Flat, rolling, hilly, steep slopes, mountainous, other:**

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

The affected area by the proposal is generally flat, though land slopes gently towards the southwest at the boarder of the affected area near 1<sup>st</sup> Ave. S. There are three small and isolated areas registering as steep slopes, but those are attributable to human-made embankments on previously built out sites. There are no mapped potential slide areas.

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

The affected area by the proposal contains a diversity of soils and fills consistent with urbanized areas. The area is within the historic Denny Regrade area, so the land contours have been modified from their natural condition. Soils are generally glacial till and clay.

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

See c above. There are no peat settlement prone areas and no known unstable soil areas.

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

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

#### f. Could erosion occur because of clearing, construction, or use? If so, generally describe.

This is a non-project action. No clearing, construction, or change of use is proposed. Erosion could occur indirectly as a result of future development if the proposal incrementally encourages or discourages development in the affected area. The proposal does not alter the potential scale of development.

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

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

discourages development in the affected area.

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

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

**2. Air** [Find help answering air questions](#)

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

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

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

The affected area by the proposal contains a variety of emission and odors consistent with urbanized areas.

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

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

**3. Water** [Find help answering water questions](#)

**a. Surface Water:** [Find help answering surface water questions](#)

**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.**

The area affected by the proposal does not contain any surface water bodies. Elliott Bay is within 1,000' of the affected area to the southeast.

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

This is a non-project action. No work over, in, or adjacent to the described waters is proposed. There are no surface water bodies in the affected area.

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

**the source of fill material.**

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

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

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

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

This is a non-project action. This affected area does not include any 100-year floodplains.

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

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

**b. Ground Water:** [Find help answering ground water questions](#)

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

This is a non-project action. The area does not include any land that contains wells. No withdrawal of groundwater will result from this proposal for drinking water or other purposes

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

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

**c. Water Runoff (including stormwater):**

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

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

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

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

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

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

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

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

**4. Plants** [Find help answering plants questions](#)

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

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

This is non project action. The affected area may contain the marked types of vegetation.

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

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

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

No threatened or endangered plant species are known to be on or near the site. Elliott Bay is within 1,000' of the site and is a habitat for migrating salmon.

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

None.

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

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

**5. Animals** [Find help answering animal questions](#)

**a. List any birds and other animals that have been observed on or near the site or are known to be on or near the site.**

**Examples include:**

- **Birds: hawk, heron, eagle, songbirds, other:**
- **Mammals: deer, bear, elk, beaver, other:**
- **Fish: bass, salmon, trout, herring, shellfish, other:**

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

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

A variety of threatened and endangered species including various birds may be in or near the site.

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

The affected areas include migration routes for a variety of species including but not limited to various birds.

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

None.

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

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

**6. Energy and Natural Resources** [Find help answering energy and natural resource questions](#)

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

This is a non-project action. No use of energy is proposed. All kinds of energy could be used indirectly as a result of future development if the proposal incrementally encourages or discourages development in the affected area.



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

This is a non-project action. No use of solar energy is proposed. Solar energy could be used indirectly as a result of future development if the proposal incrementally encourages or discourages development in the affected area. Since the proposal does not alter the allowed height bulk or scale of development, no changes to the potential to block sunlight from other sites would result.

**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.**

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

**7. Environmental Health** [Find help with answering environmental health questions](#)

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

This is a non-project action. This proposal will not directly result in any of the environmental health hazards listed above.

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

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

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

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

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

**c. Describe special emergency services that might be required.**

This is a non-project action. This proposal will not directly result in additional need for special emergency services, because the proposal would not increase the density or scale of development that could occur in the area.

**d. Proposed measures to reduce or control environmental health hazards, if any.**

None.

## b. Noise

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

The affected area contains a diversity of noise consistent with urbanized areas. The main source of noise is from cars, trucks and busses transiting on arterial streets running through the proposal area. Emergency vehicles are also a source of noise when they use sirens while in the proposal area.

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

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

### 3. Proposed measures to reduce or control noise impacts, if any.

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

## 8. Land and Shoreline Use [Find help answering land and shoreline use questions](#)

### 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 is a non-project action. There is no specific site. The areas affected by the proposal are within the DMR/R 95/65 zone. The downtown mixed residential zone allows for a broad range of uses including but not limited to multifamily housing, general sales, services business and eating and drinking uses, and offices.

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

This is a non-project action. The proposal would not directly convert any farm or forest land. The project has not been used for agricultural purposes.

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

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

### c. Describe any structures on the site.

The affected area has a diversity of structures consistent with urbanized areas including but not limited to apartment buildings, retail buildings, and office buildings.

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

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

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

This is a non project action. The affected area are within the DMR/R 95/65 zone.

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

The affected area are within the Downtown Urban Center designation of the comprehensive plan.

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

Not applicable.

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

No other critical areas besides the isolated slopes described above are found in the affected area.

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

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

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

This is a non-project action. No displacement will occur as a direct result of the project.

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

The proposal includes a limitation on the conversion of existing structures to lodging use. This is a measure to limit potential for indirect displacement of residences.

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

None. The proposal is consistent with existing land use plans and policies.

**m. Proposed measures to reduce or control impacts to agricultural and forest lands of long-term**

**commercial significance, if any.**

None.

**9. Housing** [Find help answering housing questions](#)

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

This is a non-project action. No housing is proposed to be created as part of this project.

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

This is a non-project action. No housing is proposed to be eliminated as part of this project. This proposal could indirectly result in the elimination of possible future housing development, if the proposal incrementally encourages lodging uses instead of residential use. The proposal would not cause any elimination of existing housing units.

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

Compliance with existing city ordinances on housing and tenant relocation assistance is required, as is contribution towards the Mandatory Housing Affordability (MHA) program at the time of new development. The proposal includes a limitation on conversion of an existing structure to a lodging use.

**10. Aesthetics** [Find help answering aesthetics questions](#)

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

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

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

This is a non-project action. No views would be directly altered or obstructed by this project. The proposal does not alter allowed height bulk and scale of new buildings.

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

None.

**11. Light and Glare** [Find help answering light and glare questions](#)

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

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

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

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

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

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

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

None.

**12. Recreation** [Find help answering recreation questions](#)

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

The affected area has a diversity of recreational opportunities in the immediate vicinity consistent with urbanized areas may include formal parks and natural areas. This includes Regrade Park, Bell St. Park Boulevard, Olympic Sculpture Park, and Myrtle Edwards Park.

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

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

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

None.

**13. Historic and Cultural Preservation** [Find help answering historic and cultural preservation questions](#)

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

The affected area contains some sites that are Seattle designated landmarks and some that may be eligible for designation as a historic site with either locally or federally designated status. There are 14 landmarks in the affected area and no landmark districts according to the Seattle Landmarks and Historic District map on the City website.

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

The affected area may contain a diversity of locations with evidence of Indian or historic use or occupation. The area may include locations of historic settlement by Indians and European settlers. Elliott Bay is within 1,000' of the affected area and shorelines and waters were important culturally and for transit and fishing and shellfishing to Tribes in the area.

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

This is a non-project action. The City's Seattle Landmark and Historic Districts online map was consulted for reference.

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

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

#### **14. Transportation** [Find help with answering transportation questions](#)

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

The affected area contain a diversity of streets, and parking areas consistent with urbanized areas. 1<sup>st</sup> Avenue and 2<sup>nd</sup> Avenue are the major arterial roadways travelling through the affected area.

- 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?**

The affected area is served by diversity of public transit including bus service, light rail.

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

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

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

The affected area is in broad proximity to water, and rail transportation options. Future users and occupants of the affected area may use those services.

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

were used to make these estimates?

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

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

This is a non-project action. This proposal will not directly affect the movement of agricultural and forest products. There are no major truck streets in the affected area, and few customary trips by vehicles carrying forest or agricultural products through the affected area.

**g. Proposed measures to reduce or control transportation impacts, if any.**

None.

#### **15. Public Services** [Find help answering public service questions](#)

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

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

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

None.

#### **16. Utilities** [Find help answering utilities questions](#)

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

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

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

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

### C. Signature [Find help about who should sign](#)

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.

\_\_\_\_\_ [On File] \_\_\_\_\_

Type name of signee: Rawan Hasan

Position and agency/organization: OPCD Associate Planner

Date submitted: 6/13/2023

### D. Supplemental sheet for nonproject actions [Find help for the nonproject actions worksheet](#)

**IT IS NOT REQUIRED** to use this section for project actions.

Because these questions are very general, it may be helpful to read them in conjunction with the list of the elements of the environment.

When answering these questions, be aware of the extent the proposal, or the types of activities likely to result from the proposal, would affect the item at a greater intensity or at a faster rate than if the proposal were not implemented. Respond briefly and in general terms.

#### 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?

As a non-project action, the proposal would result in no direct impacts to water, air, noise, or toxic/hazardous substances. Greenhouse gas (GHG) emissions have also been considered, and no changes to GHG emissions are expected as a result of this non-project action. Individual projects that may be subject to the proposal will occur over time and cannot be evaluated in terms of discharge to water, emissions to air, production, storage, or release of toxic or hazardous substances, or noise, at this stage. It would be speculative to attempt to quantify impacts to the future development. Such projects will be subject to environmental review (if they meet or exceed thresholds for environmental review) as they move forward. The proposal is not expected to increase potential discharge of pollutants as compared to the amounts that could occur without the proposed changes.

The proposal would not change the scale, density or intensity of the future development that could occur in the area. The only affect of the proposal is to incrementally increase the potential for lodging use to occur in the affected area in lieu of other potential uses. It is not



expected that an incremental shift to lodging uses would increase the profile of emissions compared to development that would occur in the absence of the proposal.

- **Proposed measures to avoid or reduce such increases are:**

No increases are anticipated and so no measures are proposed.

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

As a non-project action, the proposal would result in no direct impacts and are unlikely to result in indirect or cumulative impacts related to plant, animal, fish or marine life. The proposal is not increasing the number of parcels eligible for development currently allowed as a result of existing zoning designations. The proposal does not alter any regulations directly related to environmental performance of new development, such as green factor landscaping requirements, or stormwater infrastructure requirements.

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

No impacts are anticipated and so no measures are proposed.

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

As a non-project action, the proposal would result in no direct impacts and are unlikely to result in indirect or cumulative impacts related to energy or natural resources. The proposal does not increase the number of parcels eligible for development currently allowed as a result of existing zoning designations. The proposed changes do not alter any regulations directly related to energy or natural resources such as energy performance standards in new development.

The proposal would not change the scale, density or intensity of the future development that could occur in the area. The only affect of the proposal is to incrementally increase the potential for lodging use to occur in the affected area in lieu of other potential uses. It is not expected that an incremental shift to lodging uses would increase the profile of energy or natural resource use compared to development that would occur in the absence of the proposal.

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

No impacts are anticipated and so no measures are proposed.

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

As a non-project action, the proposal would result in no direct impacts and is unlikely to result in indirect or cumulative impacts related to environmentally sensitive areas or areas designated for governmental protection. This is due to the fact that the areas potentially affected are already located in intensely developed urban environments and no significant environmentally

sensitive areas are designated. The proposed changes would not alter allowances for density or scale of new development that could otherwise occur in or near environmentally sensitive areas under existing regulations.

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

None are proposed because no impacts are anticipated. The existing regulatory framework, i.e., the Land Use Code, The Shoreline Master Program, Environmentally Critical Areas Ordinance, Landmarks Preservation Ordinance and the City's SEPA ordinance will address impacts, if any, as part of the project-specific review of development proposals.

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

The proposed changes would have minor impacts on potential land use. The only affect of the proposal is to incrementally increase the potential for lodging use to occur in the affected area in lieu of other potential uses. A variety of commercial uses including lodging are consistent with the existing Comprehensive Plan and neighborhood plans for the area. Downtown Urban Center is the Comprehensive Plan designation. No incompatible uses would be allowed or encouraged by the proposal.

The impact of potentially increasing the likelihood of lodging uses in new development in lieu of other uses, is that lodging could supplant some potential residential use. City policies call strongly for residential development in and around Downtown neighborhoods including Belltown. However, as noted in the Director's Report the scale of this potential shift is very small in the context of the overall downtown housing market. Additionally it is noted that more lodging use in the area could decrease pressure to convert existing residential homes to the short term rental market (essentially a lodging use). Therefore it is ambiguous as to whether the proposal would increase or decrease the prevalence of residential uses over time.

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

A measure to reduce the potential for impact in the legislation is the limitation on conversion of existing structures to lodging use. The proposal would not exempt lodging use from floor area from the FAR limit if it is an existing buildings. The proposed change would only apply to new development, thereby lessening the potential to create pressure to convert existing residential structures to hotels.

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

As a non-project action, the proposal would result in no direct impacts and is unlikely to result in indirect or cumulative negative impacts related to transportation or public services/utilities. All areas potentially affected by the proposal are within already urbanized areas with fully developed utility infrastructures. The proposal would not change the scale, density or intensity of the future development that could occur in the area. The only affect of the proposal is to incrementally increase the potential for lodging use to occur in the affected area in lieu of other

potential uses. It is not expected that an incremental shift to lodging uses would increase the profile of demands on transportation or public services compared to development that would occur in the absence of the proposal.

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

No increased demands are anticipated and so no measures are proposed.

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

It is believed that the proposal would not result in conflicts with local, state, or federal laws or requirements for protection of the environment.



# City of Seattle

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**Office of Planning & Community Development**

Rico Quirindongo, Acting Director

**CITY OF SEATTLE  
ANALYSIS AND DECISION OF THE DIRECTOR  
OF THE OFFICE OF PLANNING AND COMMUNITY DEVELOPMENT**

**SEPA Threshold Determination  
for Belltown Lodging Use Flexibility**

- Project Sponsor:** City of Seattle Office of Planning and Community Development
- Location of Proposal:** The DMR/R 95/65 Zone
- Scope of Proposal:** The proposal is a legislative action to amend Subsection 23.49B.011 of the Seattle Municipal Code to exempt lodging use from chargeable floor area in the DMR/R 95/65 zone, treating lodging uses the same way that residential uses are regulated in the zone.

## **BACKGROUND**

### **Proposal Description**

The Office of Planning and Community Development (OPCD) is recommending a text amendment to Subsection 23.49B.011 of the Seattle Municipal Code to exempt lodging use from chargeable floor area in the DMR/R 95/65 zone. All property in the DMR/R 95/65 zone is located on approximately 8 blocks in the Belltown portion of the Downtown Urban Center. This zoning area is defined by Wall Street to the north, Lenora Street to the south and the alleys between 3<sup>rd</sup> Avenue and 2<sup>nd</sup> Avenue to east and 1<sup>st</sup> Avenue and Western Avenue to the west. Under the current DMR/R 95/65 zone, lodging uses are subject to a commercial floor area ratio (FAR) limitation of 1.5.

The City of Seattle describes the intent of the proposal in the Director's Report associated with the proposed legislation. In summary, the intent is to contribute to downtown economic recovery. Following the COVID pandemic greater downtown Seattle vacancy rates for commercial uses including office space and retail space have increased significantly. Decreases in daily office employee presence in downtown has cascading effects on the vitality of ground level retail businesses. One segment of the greater downtown economy that has remained relatively strong at present is lodging. Hotel visitors customarily patronize local businesses and restaurants and bring

increased pedestrian activity to a neighborhood. The zoning change is intended to leverage continued strong demand for hotel use to bring more support to local business and service establishments through the increased presence of hotel patrons.

## **Public Comment**

Proposed changes to the Land Use Code require City Council approval. Opportunity for public comment will occur during future Council hearings. Additionally, the City states that it solicited input from members of community-based organizations in Belltown who are in favor of the proposed amendment.

## **ANALYSIS - OVERVIEW**

The following describes the analysis conducted to determine if the proposal is likely to result in *probable significant adverse environmental impacts*. This threshold determination is based on:

- \* the copy of the proposed Ordinance;
- \* the information contained in the *SEPA checklist* (dated June, 2023);
- \* the information contained in the Director's Report; and
- \* the experience of OPCD analysts in reviewing similar documents and actions.

## **ELEMENTS OF THE ENVIRONMENT**

### **Short -Term Impacts**

As a non-project action, the proposal will not have any short-term adverse impact on the environment. Future development affected by this legislation will be reviewed under existing laws, including the City's SEPA ordinance, to address any short-term impacts on the environment.

### **Long-Term Impacts**

As a non-project action, the proposal is anticipated to have only minor long-term impacts on the environment. Impacts are attributable to any shift in the type or configuration of development that would be likely to occur in the DMR/R 95/65 zone over the long term, compared to the development that would otherwise occur in the absence of the proposal. To the extent that the proposal increases the likely pace of development in the area, this could also be an indirect long-term impact. While there may be a near-term (1-3 year) increase in the likelihood of development with the

proposal compared to without the proposal, over the long term (4-20 years) the change in overall amount of development is expected to be negligible.

## **Natural Environment**

The natural environment includes potential impacts to earth, air, water, plants/animals/fisheries, energy, natural resources, environmentally sensitive areas, noise, releases of toxic or hazardous materials. Adoption of the proposed legislation is not anticipated to result in adverse impacts on any of these elements of the natural environment. The proposal would not change the scale, density or intensity of the future development that could occur in the area. The only effect of the proposal is to incrementally increase the potential for lodging use to occur in the affected area in lieu of other potential uses. It is not expected that an incremental shift to lodging uses would increase the profile of impacts to earth, air, water, plants/animals/fisheries, energy, natural resources, environmentally sensitive areas, noise, or releases of toxic or hazardous materials, compared to other types of development that would occur in the absence of the proposal. No development standards governing landscaping requirements, tree planting, or green factor or codes related to energy area proposed for amendment.

## **Built Environment**

The proposed legislation will affect the built environment and will have only minor adverse impact related to one element of the built environment - land use. The impacts to the built environment include any impacts related to land and shoreline use, height/bulk/scale, housing, and historic preservation. Below is a discussion of the relationship between the proposal and built environment:

### *Land Use*

If the proposal incrementally increases the potential for lodging use to occur in the affected area in lieu of other potential uses, there is potential for minor adverse impact on land use with regard to consistency with land use policy and vision. The city's policies for neighborhoods in downtown including Belltown support a broad variety of uses, but an emphasis is on residential use in neighborhoods including Belltown as seen in Comprehensive Plan Goal DT-G7:

*“Encourage a mix of housing, employment, and related support activities in a crescent bounding the office and retail cores. Within this crescent, foster areas that are predominantly residential in character, including Chinatown/International District and Belltown...”*

Incrementally increasing the potential for lodging use in one zone in Belltown could be interpreted to cause partial conflict with this land use goal. However, OPCD explains in its Director's Report factors that reduce the degree of this potential conflict or mitigate it altogether.

The FAR exemption would only be available for new development. The change would not induce conversion of existing residences to hotels. Development would occur on currently vacant or underutilized parcels. It is estimated that up to 4 sites in the zoned area could be potential candidates for a new structure with a hotel.

The proposal could also reduce pressure for existing condominium residences to be rented on the short-term rental market. Increased supply of hotel rooms in the area could reduce the incentive for condominium owners to convert existing homes to short-term rentals.

The area is geographically limited to 8 blocks is a factor limiting the degree of potential impact. The geography of the affected area is not large enough to alter the overall housing market in the greater downtown area, where it remains a priority to provide increased supply of housing.

The proposal would also be highly consistent with other comprehensive plan policies for the Downtown Urban Center including the following:

*DT-G2 Encourage economic development activities consistent with the Comprehensive Plan to attract and retain businesses and to expand employment and training opportunities for Seattle area residents.*

*ST-G3 Strive to reinforce Downtown as a center of cultural and entertainment activities to foster the arts in the city, attract people to the area, create livable neighborhoods, and make Downtown an enjoyable place to be shared by all. Encourage facilities for artists to live and work in Downtown.*

In consideration of the factors that limit the degree of the land use impact, it is determined that the level of impact would not rise beyond minor. There would be no significant adverse impact.

Regarding other kinds of potential land use impacts such as compatibility of uses, there would be no impact because lodging uses have very similar patterns of activity and use characteristics as residential uses, which are already allowed and exempt from FAR in the same area.

#### *Height/Bulk/Scale*

The proposed legislation does not alter regulations regarding height, bulk, and scale. The potential envelope of new buildings with and without the proposal are identical and therefore there are no indirect impacts related to height, bulk and scale.

#### *Historic Preservation*

As noted in the SEPA checklist the area affected by the proposal includes historic landmark structures. The proposal does not encourage demolition of a landmark structures compared to the absence of the proposal. The proposed legislation would not disproportionately burden property owners whose property includes these buildings.

*Noise, Shadows on Open Spaces, Light & Glare, Environmental Health, and Public View Protection*

This proposal would not make these types of impacts more likely. At the project level, the City's regulations, including SEPA regulations, will analyze and identify any needed mitigation of these impacts. The proposal does not alter development standards for height limits or required setbacks or open space.

*Transportation and Parking*

The proposal is not anticipated to result in any direct adverse impacts on transportation or parking. If the proposal incrementally increases the potential for lodging use to occur in the affected area in lieu of other potential uses, it is not expected that it would result in increased demand on transportation or parking. In the Belltown neighborhood lodging patrons commonly opt for non-personal vehicle transportation modes.

*Public Services and Utilities*

Adoption of the proposal would not create any impacts on public services or utilities. If the proposal incrementally increases the potential for lodging use to occur in the affected area in lieu of other potential uses, it is not expected that it would result in increased demand for public services or utilities. Lodging uses have a similar demand profile on public services and utilities to residential uses.



## **DECISION – SEPA**

This decision was made after review by the responsible official on behalf of the lead agency of a completed environmental checklist and other information on file with the responsible department. This constitutes the Threshold Determination and form. The intent of this declaration is to satisfy the requirements of the State Environmental Policy Act (RCW 43.21C), including the requirement to inform the public agency decisions pursuant to SEPA.

- [X] Determination of Non-Significance. This proposal has been determined to not have a significant adverse impact upon the environment. An EIS is not required under RCW 43.21C.030(2)(c).
- [ ] Determination of Significance. This proposal has or may have a significant adverse impact upon the environment. An EIS is required under RCW 43.21C.030(2)(c).

## **RECOMMENDED CONDITONS--SEPA**

None

Signature: \_\_\_[On File]\_\_\_\_\_

Geoffrey Wentlandt, Land Use Policy Manager  
Office of Planning and Community Development

Date: June 14, 2023