SEATTLE CITY COUNCIL

Select Committee on the Comprehensive Plan

Agenda

Monday, August 4, 2025

9:30 AM

Council Chamber, City Hall
600 4th Avenue
Seattle, WA 98104

Joy Hollingsworth, Chair
Mark Solomon, Vice-Chair
Robert Kettle, Member
Debora Juarez, Member
Sara Nelson, Member
Alexis Mercedes Rinck, Member
Maritza Rivera, Member
Rob Saka, Member
Dan Strauss, Member

Chair Info: 206-684-8803; Joy.Hollingsworth@seattle.gov

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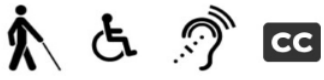

SEATTLE CITY COUNCIL

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Agenda

August 4, 2025 - 9:30 AM

Meeting Location:
Council Chamber, City Hall , 600 4th Avenue , Seattle, WA 98104

Committee Website:
https://www.seattle.gov/council/issues/2025-comprehensive-plan

This meeting also constitutes a meeting of the City Council, provided that the meeting shall be conducted as a committee meeting under the Council Rules and Procedures, and Council action shall be limited to committee business.

Only written public comment will be accepted at this meeting. Please submit written comments no later than four business hours prior to the start of the meeting to ensure that they are distributed to Councilmembers prior to the meeting. Comments may be submitted at Council@seattle.gov or at Seattle City Hall, Attn: Council Public Comment, 600 4th Ave., Floor 2, Seattle, WA 98104. Business hours are considered 8 a.m. - 5 p.m. Comments received after that time will be distributed after the meeting to Councilmembers and included as part of the public record.

Please Note: Times listed are estimated

A. Call To Order

B. Approval of the Agenda

C. Items of Business

1. CB 120985 **AN ORDINANCE relating to land use and zoning; repealing and replacing the Seattle Comprehensive Plan pursuant to a major update, with new goals, policies, and elements and a new Future Land Use Map; amending Sections 5.72.020, 5.72.030, 5.73.030, 6.600.040, 22.805.070, 23.34.007, 23.34.008, 23.34.009, 23.34.010, 23.34.011, 23.34.012, 23.34.014, 23.34.018, 23.34.020, 23.34.024, 23.34.028, 23.34.074, 23.34.076, 23.34.078, 23.34.080, 23.34.082, 23.34.086, 23.34.099, 23.34.100, 23.34.108, 23.34.110, 23.34.128, 23.40.070, 23.41.004, 23.41.012, 23.42.058, 23.44.019, 23.45.509, 23.45.510, 23.45.514, 23.45.516, 23.45.527, 23.45.530, 23.45.532, 23.45.550, 23.47A.004, 23.47A.005, 23.47A.008, 23.47A.009, 23.47A.012, 23.47A.013, 23.48.002, 23.48.021, 23.48.220, 23.48.221, 23.48.225, 23.48.245, 23.48.250, 23.48.285, 23.48.290, 23.48.602, 23.48.605, 23.48.610, 23.48.623, 23.48.690, 23.48.710, 23.48.720, 23.48.723, 23.48.740, 23.48.780, 23.48.785, 23.48.802, 23.48.905, 23.48.940, 23.49.012, 23.49.019, 23.49.036, 23.50.012, 23.50A.040, 23.50A.190, 23.50A.360, 23.51A.004, 23.52.004, 23.52.008, 23.53.006, 23.54.015, 23.54.016, 23.54.020, 23.54.035, 23.58A.014, 23.58A.024, 23.58A.040, 23.58A.042, 23.58B.040, 23.58B.050, 23.58C.040, 23.58C.050, 23.69.022, 23.69.026, 23.69.035, 23.71.020, 23.74.002, 23.84A.025, 23.84A.026, 23.84A.032, 23.84A.038, 23.84A.040, 23.84A.042, 23.86.006, 25.05.164, 25.05.665, and 25.05.800 of the Seattle Municipal Code; and amending the title of Sections 23.48.230, 23.48.235, 23.48.240, 23.48.255, and 23.48.280 of the Seattle Municipal Code.**

Attachments:
- Full Text: CB 120985 v1
- Att 1 - One Seattle Plan Comprehensive Plan Update Citywide Policies
- Att 2 - One Seattle Plan Comprehensive Plan Update Appendices
- Att 3 - One Seattle Plan Comprehensive Plan Update Subarea Plans Placeholder

Supporting Documents:
- Summary and Fiscal Note
- Summary Ex 1 - Racial Equity Analysis
- Summary Ex 2 - One Seattle Comprehensive Plan Update Final Environmental Impact Statement
- Summary Ex 3 - One Seattle Comprehensive Plan Update Final Environmental Impact Statement Appendices
- One Seattle Plan Proposed Center Boundary Maps

Briefing and Discussion (100 minutes)

Presenters: Lish Whitson, Ketil Freeman, and HB Harper, Council Central Staff

2. CB 120993 **AN ORDINANCE relating to land use and zoning; implementing a major update of Neighborhood Residential zones and modifying development standards in other zones to comply with various state laws; amending Chapter 23.32 of the Seattle Municipal Code at pages 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 98, 99, 100, 102, 103, 104, 105, 106, 107, 111, 112, 113, 114, 117, 118, 119, 120, 121, 122, 123, 124, 125, 126, 131, 132, 133, 134, 135, 136, 137, 138, 139, 140, 143, 144, 145, 146, 147, 148, 149, 150, 151, 152, 153, 156, 157, 158, 159, 160, 161, 162, 163, 164, 165, 166, 167, 168, 170, 171, 172, 173, 174, 175, 176, 177, 178, 179, 180, 181, 182, 183, 184, 186, 187, 188, 189, 190, 191, 192, 193, 194, 195, 196, 197, 198, 199, 200, 201, 203, 204, 205, 206, 207, 208, 209, 210, 211, 212, 213, 214, 216, 217, 219, 220, and 221 of the Official Land Use Map; amending Chapters 6.600, 14.08, 14.09, 15.32, 21.49, 22.214, 22.801, 22.907, 23.22, 23.24, 23.28, 23.30, 23.34, 23.42, 23.45, 23.47A, 23.48, 23.49, 23.50, 23.51A, 23.51B, 23.53, 23.54, 23.58C, 23.60A, 23.66, 23.72, 23.75, 23.76, 23.80, 23.84A, 23.86, 23.90, 23.91, 25.09, and 25.11 of the Seattle Municipal Code; renumbering existing subsection 23.54.015.K of the Seattle Municipal Code as Section 23.54.037 and further amending the section; renumbering existing subsections 23.54.030.F, 23.54.030.G, 23.54.030.K, and 23.54.030.L as Sections 23.54.031, 23.54.032, 23.54.033, and 23.54.034 and further amending the sections; repealing Chapter 23.44 and Sections 23.34.010, 23.34.012, 23.34.013, 23.34.072, 23.42.130, 23.45.512, 23.45.531, 23.86.010, and 25.09.260 of the Seattle Municipal Code; adding a new Chapter 23.44 and new Sections 23.42.024, 23.42.132, 23.45.519, 23.80.006, 23.80.008, 23.80.010, 25.09.055, and 25.11.025 to the Seattle Municipal Code; and repealing Ordinance 127219.**

Attachments: Full Text: CB 120993 v1
Att 1 - Map of Specific Rezone Areas
Att 2 - Repealed Text of Chapter 23.44
Att 3 - Ord. 127219

Supporting Documents:

Summary and Fiscal Note
Summary Att 1 - SDCI Implementation Cost Memo
Summary Att 2 - One Seattle Plan RET Summary Report

Briefing and Discussion (100 minutes)

Presenters: Lish Whitson, Ketil Freeman, and HB Harper, Council Central Staff

D. Adjournment

Legislation Text

File #: CB 120985, **Version:** 1

AN ORDINANCE relating to land use and zoning; repealing and replacing the Seattle Comprehensive Plan pursuant to a major update, with new goals, policies, and elements and a new Future Land Use Map; amending Sections 5.72.020, 5.72.030, 5.73.030, 6.600.040, 22.805.070, 23.34.007, 23.34.008, 23.34.009, 23.34.010, 23.34.011, 23.34.012, 23.34.014, 23.34.018, 23.34.020, 23.34.024, 23.34.028, 23.34.074, 23.34.076, 23.34.078, 23.34.080, 23.34.082, 23.34.086, 23.34.099, 23.34.100, 23.34.108, 23.34.110, 23.34.128, 23.40.070, 23.41.004, 23.41.012, 23.42.058, 23.44.019, 23.45.509, 23.45.510, 23.45.514, 23.45.516, 23.45.527, 23.45.530, 23.45.532, 23.45.550, 23.47A.004, 23.47A.005, 23.47A.008, 23.47A.009, 23.47A.012, 23.47A.013, 23.48.002, 23.48.021, 23.48.220, 23.48.221, 23.48.225, 23.48.245, 23.48.250, 23.48.285, 23.48.290, 23.48.602, 23.48.605, 23.48.610, 23.48.623, 23.48.690, 23.48.710, 23.48.720, 23.48.723, 23.48.740, 23.48.780, 23.48.785, 23.48.802, 23.48.905, 23.48.940, 23.49.012, 23.49.019, 23.49.036, 23.50.012, 23.50A.040, 23.50A.190, 23.50A.360, 23.51A.004, 23.52.004, 23.52.008, 23.53.006, 23.54.015, 23.54.016, 23.54.020, 23.54.035, 23.58A.014, 23.58A.024, 23.58A.040, 23.58A.042, 23.58B.040, 23.58B.050, 23.58C.040, 23.58C.050, 23.69.022, 23.69.026, 23.69.035, 23.71.020, 23.74.002, 23.84A.025, 23.84A.026, 23.84A.032, 23.84A.038, 23.84A.040, 23.84A.042, 23.86.006, 25.05.164, 25.05.665, and 25.05.800 of the Seattle Municipal Code; and amending the title of Sections 23.48.230, 23.48.235, 23.48.240, 23.48.255, and 23.48.280 of the Seattle Municipal Code.

The full text of this legislation is available as an attachment to the file.

CITY OF SEATTLE

ORDINANCE _____

COUNCIL BILL _____

..title

AN ORDINANCE relating to land use and zoning; repealing and replacing the Seattle Comprehensive Plan pursuant to a major update, with new goals, policies, and elements and a new Future Land Use Map; amending Sections 5.72.020, 5.72.030, 5.73.030, 6.600.040, 22.805.070, 23.34.007, 23.34.008, 23.34.009, 23.34.010, 23.34.011, 23.34.012, 23.34.014, 23.34.018, 23.34.020, 23.34.024, 23.34.028, 23.34.074, 23.34.076, 23.34.078, 23.34.080, 23.34.082, 23.34.086, 23.34.099, 23.34.100, 23.34.108, 23.34.110, 23.34.128, 23.40.070, 23.41.004, 23.41.012, 23.42.058, 23.44.019, 23.45.509, 23.45.510, 23.45.514, 23.45.516, 23.45.527, 23.45.530, 23.45.532, 23.45.550, 23.47A.004, 23.47A.005, 23.47A.008, 23.47A.009, 23.47A.012, 23.47A.013, 23.48.002, 23.48.021, 23.48.220, 23.48.221, 23.48.225, 23.48.245, 23.48.250, 23.48.285, 23.48.290, 23.48.602, 23.48.605, 23.48.610, 23.48.623, 23.48.690, 23.48.710, 23.48.720, 23.48.723, 23.48.740, 23.48.780, 23.48.785, 23.48.802, 23.48.905, 23.48.940, 23.49.012, 23.49.019, 23.49.036, 23.50.012, 23.50A.040, 23.50A.190, 23.50A.360, 23.51A.004, 23.52.004, 23.52.008, 23.53.006, 23.54.015, 23.54.016, 23.54.020, 23.54.035, 23.58A.014, 23.58A.024, 23.58A.040, 23.58A.042, 23.58B.040, 23.58B.050, 23.58C.040, 23.58C.050, 23.69.022, 23.69.026, 23.69.035, 23.71.020, 23.74.002, 23.84A.025, 23.84A.026, 23.84A.032, 23.84A.038, 23.84A.040, 23.84A.042, 23.86.006, 25.05.164, 25.05.665, and 25.05.800 of the Seattle Municipal Code; and amending the title of Sections 23.48.230, 23.48.235, 23.48.240, 23.48.255, and 23.48.280 of the Seattle Municipal Code.

..body

WHEREAS, The City of Seattle adopted its Comprehensive Plan with Ordinance 117221 in 1994, pursuant to the provisions of the Growth Management Act, chapter 36.70A RCW; and

WHEREAS, the City has made amendments to its Comprehensive Plan most years through its annual update or major update process, as authorized by the Growth Management Act; and

WHEREAS, in May 2020 the Puget Sound Regional Council, which includes The City of Seattle, adopted VISION 2050, a regional growth strategy which supports continued growth in urban areas, preservation of rural areas and open space, and focuses a significant share of job and population growth near high-capacity transit; and

WHEREAS, in December 2021 the King County Council adopted Ordinance 19384 for updated 2021 Countywide Planning Policies, as recommended by the Growth Management Planning Council, to implement VISION 2050, the regional plan for growth, and create a shared and consistent growth management framework for all jurisdictions in King County to incorporate in local comprehensive plans, including growth targets for housing and jobs through 2044; and

WHEREAS, in April 2021 the Washington State Legislature passed HB 1220 which amended the Growth Management Act to require all jurisdictions to plan for and accommodate housing, including emergency shelters, affordable to all income levels; and

WHEREAS in April 2023 the Washington State Legislature passed HB 1110 which amended the Growth Management Act to require certain cities, including Seattle, to allow the development of "middle housing" in all residential areas, including at least four units on each lot and at least six units per lot near a major transit stop or when at least two units are affordable; and

WHEREAS, in April 2023 the Washington State Legislature passed HB 1181 which amended the Growth Management Act to require certain cities, including Seattle, to include a new element in their comprehensive plans focused on reducing greenhouse gas emissions and strengthening climate resilience; and

WHEREAS, the City reviewed applicable adopted statutes for cities planning under the Growth Management Act passed subsequent to the City's last major update of the Comprehensive Plan in 2015 and incorporated or addressed all relevant provisions into the One Seattle Comprehensive Plan; and

WHEREAS, in November 2019 the Seattle City Council imposed a proviso on $500,000 of the Office of Planning and Community Development's budget to ensure certain issues were studied in an environmental impacts statement, including additional housing capacity in single family areas for middle housing types, strategies to minimize displacement, and alternative names for single family zones; and

WHEREAS, in April 2021 the Office of Planning and Community Development published a Market Rate Housing Needs and Supply Analysis that found that housing supply was not keeping pace with demand, housing costs were increasing faster than incomes, market development was producing few new homeownership units, the City lacked sufficient development capacity for middle housing, the supply of affordable rental units did not meet the needs of lower income households, and many lower income households commuted long distances from communities outside the City to reach their jobs; and

WHEREAS, in July 2021 the Office of Planning and Community Development published a Racial Equity Analysis of Seattle 2035 and Urban Village Strategy that identified ongoing racial disparities in housing and access to opportunity and made recommendations to advance racial equity in the next update of the Comprehensive Plan; and

WHEREAS, in July 2022 the Seattle City Council adopted Resolution 32059 confirming the City's intent to address climate change and improve resiliency as part of the One Seattle update to the Comprehensive Plan; and

WHEREAS, the Office of Planning and Community Development, in cooperation with other City agencies including the Seattle Planning Commission, began in 2022 a series of programs and events, under the title One Seattle Plan, to engage the public in discussions

about potential changes to the Comprehensive Plan, consistent with the One Seattle Plan Public Participation Program and documented in the One Seattle Plan Public Engagement Report; and

WHEREAS, in March 2024 the Office of Planning and Community Development published a Draft Environmental Impact Statement analyzing the potential effects of five different growth alternatives in the City through 2044, conducted two public hearings on April 17, 2024 and April 22, 2024, and received comments from the public on this document; and

WHEREAS, in March 2024 the Office of Planning and Community Development published a Draft Comprehensive Plan rooted in a deliberate approach to creating more housing, encouraging density near amenities and frequent transit, and mitigating displacement; and

WHEREAS, the Office of Planning and Community Development held open houses across all seven council districts during Spring 2024, including open houses at Loyal Heights Community Center on March 14, Cleveland High School on March 19, Nathan Hale High School on March 26, Chief Sealth International High School on April 3, Garfield Community Center on April 16, Eckstein Middle School on April 25, McClure Middle School on April 30, and an online open house on May 2, and received input from residents and community groups over a two-month public comment period; and

WHEREAS, in January 2025 the Office of Planning and Community Development published a Final Environmental Impact Statement that included analysis of a preferred growth strategy alternative that increased potential housing supply in the City by doubling residential development capacity and that promoted housing supply, variety, and affordability by adding new and expanded areas for growth in neighborhoods across the City; and

WHEREAS, the Director's Report accompanying this ordinance shows the recommended changes to goals and policies between the current Comprehensive Plan and the updated Plan; and

WHEREAS, the City Council intends goals and policies contained in the Seattle 2035 Comprehensive Plan that are carried over to One Seattle Comprehensive Plan to have the same meaning and intent; and

WHEREAS, the City Council has considered public testimony made at public hearings and other pertinent materials regarding the proposed amendments; and

WHEREAS, the City Council finds that the amendments to be adopted are consistent with the Growth Management Act, and will promote the health, safety, and welfare of the general public; NOW, THEREFORE,

BE IT ORDAINED BY THE CITY OF SEATTLE AS FOLLOWS:

Section 1. The current Seattle Comprehensive Plan, Seattle 2035, last amended by Ordinance 126730, is repealed and replaced by the One Seattle Plan, which consists of three parts, attached to this ordinance: Attachment 1 – One Seattle Plan Comprehensive Plan Update Citywide Policies; Attachment 2 – One Seattle Plan Comprehensive Plan Update Appendices; and Attachment 3 – One Seattle Plan Comprehensive Plan Update Subarea Plans Placeholder.

Section 2. Section 5.72.020 of the Seattle Municipal Code, last amended by Ordinance 125173, is amended as follows:

5.72.020 Definitions((.))

As used in this ((~~chapter~~)) Chapter 5.72:

* * *

J. "Residential targeted area" means an area within an urban ((~~village~~)) center that has been so designated by the City Council pursuant to this ((~~chapter~~)) Chapter 5.72.

* * *

L. "Urban ((~~village~~)) center" as used in this Chapter 5.72 means a neighborhood that: (1) is within an area designated as ((~~either a hub urban village or a residential urban village~~)) an urban center in the City's Comprehensive Plan; and (2) meets the definition of an "urban center" as defined in RCW 84.14.010.

Section 3. Section 5.72.030 of the Seattle Municipal Code, last amended by Ordinance 120135, is amended as follows:

5.72.030 Residential targeted areas—Criteria—Designation((~~.~~))

A. Following notice and public hearing as prescribed in RCW 84.14.040, the City Council may designate one ((~~(1)~~)) or more residential targeted areas, upon a finding by the City Council in its sole discretion that the residential targeted area meets the following criteria:

1. The residential targeted area is within an urban ((~~village~~)) center;

2. The residential targeted area lacks sufficient available, desirable, and convenient residential housing to meet the needs of the public who would be likely to live in the urban ((~~village~~)) center if desirable, attractive, and livable residences were available; and

3. Providing additional housing opportunity in the residential targeted area will assist in achieving one ((~~(1)~~)) or more of the following purposes:

a. Encourage increased residential opportunities within the City; or

b. Stimulate the construction of new affordable multifamily housing; and

c. Encourage the rehabilitation of existing vacant and underutilized buildings for multifamily housing.

* * *

Section 4. Section 6.600.040 of the Seattle Municipal Code, enacted by Ordinance 125490, is amended as follows:

6.600.040 License required

* * *

B. Operators. It is unlawful for any person to operate as a short-term rental operator within the City without a valid short-term rental operator license issued pursuant to this Chapter 6.600. A short-term rental operator license permits an operator to offer or provide a maximum of one dwelling unit, or portion thereof, for short term rental use, or a maximum of two dwelling units if one of the units is the operator's primary residence, except for the following:

1. An operator who offered or provided a short-term rental outside of the locations described in subsections 6.600.040.B.2 or 6.600.040.B.3 prior to September 30, 2017, may obtain a short-term rental operator license allowing that operator to continue to operate up to two dwelling units for short-term rental use, subject to the requirements of subsection 6.600.040.B.4. Upon renewal of the license after one year of operations, the operator may obtain a license allowing that operator to: continue to operate the two units; and add a third dwelling unit if the unit is the operator's primary residence.

2. An operator who offered or provided a short-term rental in the Downtown ((~~Urban~~)) Regional Center, south of Olive Way and north of Cherry Street, as established in the Seattle Comprehensive Plan (2016), prior to September 30, 2017, may obtain a short-term rental operator license allowing them to continue to operate those units and to offer or provide up to one additional dwelling units for short-term rental use, or a maximum of two dwelling units, if

one of the units is the operator's primary residence, subject to the requirements of subsection 6.600.040.B.4.

3. An operator who offered or provided a short-term rental in any dwelling units within a multifamily building constructed after 2012 that contains no more than five dwelling units established by permit under Title 23 and is located in the First Hill/Capitol Hill ((~~Urban~~)) Regional Center, as established in the Seattle Comprehensive Plan, prior to September 30, 2017, may obtain a short-term rental operator license allowing them to continue to operate those units and to offer or provide up to one additional dwelling units for short-term rental use, or a maximum of two dwelling units, if one of the units is the operator's primary residence, subject to the requirements of subsection 6.600.040.B.4.

4. If the license applicant wishes to continue operating a short-term rental in a location described in subsections 6.600.040.B.1, 6.600.040.B.2, or 6.600.040.B.3 the applicant must provide the Director with the following evidence of prior short-term rental use:

a. A business license tax certificate issued by the Department of Finance and Administrative Services for the short-term rental use, in effect on prior to September 30, 2017; and

b. Records demonstrating collection and remittance of all applicable local, state, and federal taxes within the 12-month period prior to September 30, 2017; and

c. A registry identifying the dates the dwelling unit was used as short-term rental within the 12-month period prior to September 30, 2017((~~.~~)) ; and

d. Certification that, if the applicant is a renter, the owner has authorized the tenant’s operation of the dwelling unit as a short-term rental. If requested by the Director, the

applicant shall provide documentation demonstrating that the owner has provided that authorization.

* * *

Section 5. Section 22.805.070 of the Seattle Municipal Code, last amended by Ordinance 126336, is amended as follows:

22.805.070 Minimum requirements for on-site stormwater management

* * *

D. On-site lists

1. For each project surface, follow the appropriate project table in subsection 22.805.070.D.2 to subsection 22.805.070.D.5 to evaluate on-site BMPs shown for that type of surface, by category. The project tables apply to roofs and other hard (non-roof) surfaces. All on-site BMPs used must comply with the rules promulgated by the Director. For each surface, consider all of the applicable on-site BMPs in the first category. Use any that is considered feasible. If none is feasible for that surface, move on to each successive category and repeat the selection process as necessary. Once one on-site BMP is used for a surface, no other on-site BMP is necessary for that surface. If no BMP in the appropriate categories is feasible, then no further evaluation is required for that surface under this subsection 22.805.070.D.1. Feasibility shall be determined by evaluation against:

a. Design criteria, minimum size, limitations, and infeasibility criteria identified for each BMP in this subsection 22.805.070.D and the rules promulgated by the Director; and

b. Competing needs. ((~~Subsection~~)) This subsection 22.805.070.D (On-site lists) can be superseded or reduced by the Director if the installation of the BMPs is in conflict with:

1) Any of the following federal or state laws, rules, and standards, as may be amended or superseded: ((~~Historic Preservation~~)) historic preservation and ((~~Archaeology Laws~~)) archaeology laws identified in subsection 22.805.070.E (Historic preservation and archaeology laws), Federal Superfund or Washington State Model Toxics Control Act, Federal Aviation Administration requirements for airports, the Americans with Disabilities Act, and related rules and standards; or

2) Special zoning district design criteria adopted and being implemented pursuant to a community planning process. Special zoning districts include, for example, historic and preservation districts, pedestrian zone overlays, station area overlays, special review districts, multifamily residential zones, ((~~urban centers and urban villages~~)) regional centers and urban centers, and master planned communities. Specific criteria in these areas include, but are not limited to, minimum Floor Area Ratio standards; zero lot line development; usable open space requirements; minimum sidewalk width and required bicycle facilities; alley, loading, and access requirements; pitched roof standards; and street-level development standards for modulation and projections; or

3) Public health and safety standards; or

4) Transportation regulations to maintain the option for future expansion or multi-modal use of public rights-of-way; or

5) Chapter 15.43 (Tree and Vegetation Management in Public Places); Chapter 25.09 (Regulations for Environmentally Critical Areas); Chapter 25.11 (Tree Protection); and Chapter 23.60A (Standards for Vegetation in the Shoreline Master Plan).

* * *

Section 6. Section 23.34.007 of the Seattle Municipal Code, last amended by Ordinance 124105, is amended as follows:

23.34.007 Rezone evaluation

* * *

D. ((~~Provisions of this chapter that pertain to areas inside of urban centers or villages shall be effective only when a boundary for the subject center or village has been established in the Comprehensive Plan. Provisions of this chapter that pertain to areas outside of urban villages or outside of urban centers shall apply to all areas that are not within an adopted urban village or urban center boundary.~~

~~E.~~)) The procedures and criteria for shoreline environment redesignations are located in Sections 23.60A.042, 23.60A.060, and 23.60A.220.

((~~F~~)) E. Mapping errors due to cartographic or clerical mistakes may be corrected through process required for Type V Council land use decisions in ((~~SMC~~)) Chapter 23.76 and do not require the evaluation contemplated by the provisions of this ((~~chapter~~)) Chapter 23.34.

Section 7. Section 23.34.008 of the Seattle Municipal Code, last amended by Ordinance 125791, is amended as follows:

23.34.008 General rezone criteria

A. To be approved, a rezone in a regional center shall ((~~meet the following standards: 1. In urban centers and urban villages~~)) not reduce the zoned capacity for the center ((~~or village~~))

taken as a whole ((~~shall be no~~)) to less than 125 percent of the growth estimates adopted in the Seattle Comprehensive Plan for that center ((~~or village. 2. For the area within the urban village boundary of hub urban villages and for residential urban villages taken as a whole the zoned capacity shall not be less than the densities established in the Growth Strategy Element of the Comprehensive Plan~~)) .

* * *

D. ((~~Neighborhood Plans~~)) Regional center plans. Regional center subarea plans adopted by the Council within ten years of the rezone application shall be taken into account.

((~~1. For the purposes of this title, the effect of a neighborhood plan, adopted or amended by the City Council after January 1, 1995, shall be as expressly established by the City Council for each such neighborhood plan.~~

~~2. Council adopted neighborhood plans that apply to the area proposed for rezone shall be taken into consideration.~~

~~3. Where a neighborhood plan adopted or amended by the City Council after January 1, 1995 establishes policies expressly adopted for the purpose of guiding future rezones, but does not provide for rezones of particular sites or areas, rezones shall be in conformance with the rezone policies of such neighborhood plan.~~

~~4. If it is intended that rezones of particular sites or areas identified in a Council adopted neighborhood plan are to be required, then the rezones shall be approved simultaneously with the approval of the pertinent parts of the neighborhood plan.~~))

E. Zoning principles. The following zoning principles shall be considered:

1. The impact of more intensive zones on less intensive zones, or industrial and commercial zones on other zones, shall be minimized by the use of transitions or buffers, if possible. A gradual transition between zoning categories, including height limits, is preferred.

2. Physical buffers may provide an effective separation between different uses and intensities of development. The following elements may be considered as buffers:

a. Natural features such as topographic breaks, lakes, rivers, streams, ravines, and shorelines;

b. Freeways, expressways, other major traffic arterials, and railroad tracks;

c. Distinct change in street layout and block orientation;

d. Open space and greenspaces.

3. Zone boundaries

a. In establishing boundaries, the following elements shall be considered:

1) Physical buffers as described in subsection 23.34.008.E.2; and

2) Platted lot lines.

b. Boundaries between commercial and residential areas shall generally be established so that commercial uses face each other across the street on which they are located, and face away from adjacent residential areas. An exception may be made when physical buffers can provide a more effective separation between uses.

4. In general, height limits greater than 55 feet should be limited to regional centers, urban ((~~villages~~)) centers, neighborhood centers, sites within 125 feet of a street with a frequent transit route, or sites greater than 20,000 square feet. Height limits greater than 55 feet may be considered outside of ((~~urban villages~~)) these areas where higher height limits would be consistent with ((~~an adopted neighborhood plan,~~)) a ((~~major institution's~~)) Major Institution's

adopted master plan((,)) or where the designation would be consistent with the existing built character of the area.

* * *

Section 8. Section 23.34.009 of the Seattle Municipal Code, last amended by Ordinance 127099, is amended as follows:

23.34.009 Height limits of the proposed rezone

If a decision to designate height limits in residential, commercial, or industrial zones is independent of the designation of a specific zone, in addition to the general rezone criteria of Section 23.34.008, the following shall apply:

A. Function of the zone. Height limits shall be consistent with the type and scale of development intended for each zone classification. The demand for permitted goods and services and the potential for displacement of preferred uses shall be considered.

B. Topography of the area and its surroundings. Height limits shall reinforce the natural topography of the area and its surroundings, and the likelihood of view blockage shall be considered.

C. Height and scale of the area

1. The height limits established by current zoning in the area shall be given consideration.

2. In general, permitted height limits shall be compatible with the predominant height and scale of existing development, particularly where existing development is a good measure of the area's overall development potential.

D. Compatibility with surrounding area

1. Height limits for an area shall be compatible with actual and zoned heights in surrounding areas excluding buildings developed under Major Institution height limits; height limits permitted by the underlying zone, rather than heights permitted by the Major Institution designation, shall be used for the rezone analysis.

2. A gradual transition in height and scale and level of activity between zones shall be provided unless major physical buffers, as described in subsection 23.34.008.E.2, are present.

((~~E. Neighborhood plans~~

~~1. Particular attention shall be given to height recommendations in business district plans or neighborhood plans adopted by the City Council subsequent to the adoption of the 1985 Land Use Map.~~

~~2. Neighborhood plans adopted or amended by the City Council after January 1, 1995, may require height limits different than those that would otherwise be established pursuant to the provisions of this Section 23.34.009 and Section 23.34.008.~~))

Section 9. Section 23.34.010 of the Seattle Municipal Code, last amended by Ordinance 126509, is amended as follows:

23.34.010 Designation of NR1, NR2, and NR3 zones

* * *

B. Areas zoned NR1, NR2, or NR3 that meet the locational criteria contained in subsections 23.34.011.B.1 ((~~through 23.34.011.B.3~~)) and 23.34.011.B.2 may only be rezoned to zones more intense than NR3 if they are located within the adopted boundaries of ((~~an~~)) a regional or urban ((~~village~~)) center, and the rezone is to a zone that is subject to the provisions of Chapter 23.58B and Chapter 23.58C.

Section 10. Section 23.34.011 of the Seattle Municipal Code, last amended by Ordinance 126509, is amended as follows:

23.34.011 NR1, NR2, and NR3 zones, function, and locational criteria

* * *

B. Locational criteria. An NR1, NR2, or NR3 zone designation is most appropriate in areas that are outside of ((~~urban centers and villages~~)) regional, urban, and neighborhood centers and meet the following criteria:

1. Areas that consist of blocks with at least 70 percent of the existing structures, not including detached accessory dwelling units, in single-family residential use; or

((~~2. Areas that are designated by an adopted neighborhood plan as appropriate for single-family residential use; or~~

~~3~~)) 2. Areas that consist of blocks with less than 70 percent of the existing structures, not including detached accessory dwelling units, in single-family residential use but in which an increasing trend toward single-family residential use can be demonstrated; for example:

a. The construction of single-family structures, not including detached accessory dwelling units, in the last five years has been increasing proportionately to the total number of constructions for new uses in the area, or

b. The area shows an increasing number of improvements and rehabilitation efforts to single-family structures, not including detached accessory dwelling units, or

c. The number of existing single-family structures, not including detached accessory dwelling units, has been very stable or increasing in the last five years, or

d. The area's location is topographically and environmentally suitable for single-family residential developments.

* * *

Section 11. Section 23.34.012 of the Seattle Municipal Code, last amended by Ordinance 126855, is amended as follows:

23.34.012 Neighborhood Residential Small Lot (RSL) zone, function, and locational criteria

A. Function. An area within an urban ((~~village~~)) center that provides for the development of homes on small lots that may be more affordable compared to detached homes on larger lots and appropriate for households with children.

B. Locational criteria. An RSL zone is most appropriate in areas generally characterized by the following:

1. The area is similar in character to neighborhood residential zones;

2. The area is located inside ((~~an urban center, urban village,~~)) a regional center, an urban center, a neighborhood center, or a Station Area Overlay District where it would provide opportunities for a diversity of housing types within these denser environments;

3. The area is characterized by, or appropriate for, a mix of single-family dwelling units, multifamily structures that are similar in scale to single-family dwelling units, such as duplex, triplex, rowhouse, and townhouse developments, and single-family dwelling units that have been converted to multifamily residential use or are well-suited to conversion;

4. The area is characterized by local access and circulation that can accommodate low-density development oriented to the ground level and the street, and/or by narrow roadways, lack of alleys, and/or irregular street patterns that make local access and circulation less suitable for higher density multifamily development;

5. The area is within a reasonable distance of ((~~frequency~~)) frequent transit service, but is not close enough to make higher density multifamily development more appropriate.

6. The area would provide a gradual transition between neighborhood residential zoned areas and multifamily or neighborhood commercial zoned areas; and

7. The area is supported by existing or projected facilities and services used by residents, including retail sales and services, parks, and community centers.

Section 12. Section 23.34.014 of the Seattle Municipal Code, last amended by Ordinance 126509, is amended as follows:

23.34.014 Lowrise 1 (LR1) zone, function, and locational criteria

* * *

B. Locational ((~~Criteria~~)) criteria. The LR1 zone is most appropriate in areas generally characterized by the following conditions:

1. The area is similar in character to neighborhood residential zones;

2. The area is either:

a. ((~~located~~)) Located outside of ((~~an urban center, urban village,~~)) a regional center, an urban center, a neighborhood center, or a Station Area Overlay District;

b. ((~~a~~)) A limited area within ((~~an urban center, urban village,~~)) a regional center, an urban center, a neighborhood center, or a Station Area Overlay District that would provide opportunities for a diversity of housing types within these denser environments; or

c. ((~~located~~)) Located on a collector or minor arterial;

3. The area is characterized by a mix of single-family dwelling units, multifamily structures that are similar in scale to single-family dwelling units, such as rowhouse and

townhouse developments, and single-family dwelling units that have been converted to multifamily residential use or are well-suited to conversion;

4. The area is characterized by local access and circulation that can accommodate low-density multifamily development oriented to the ground level and the street, and/or by narrow roadways, lack of alleys, and/or irregular street patterns that make local access and circulation less suitable for higher density multifamily development;

5. The area would provide a gradual transition between neighborhood residential zoned areas and multifamily or neighborhood commercial zoned areas; and

6. The area is supported by existing or projected facilities and services used by residents, including retail sales and services, parks, and community centers.

Section 13. Section 23.34.018 of the Seattle Municipal Code, last amended by Ordinance 126509, is amended as follows:

23.34.018 Lowrise 2 (LR2) zone, function, and locational criteria

A. Functions. The dual functions of the LR2 zone are to:

1. Provide opportunities for a variety of multifamily housing types in existing multifamily neighborhoods and along arterials that have a mix of small scale residential structures; and

2. Accommodate redevelopment in areas within ((~~urban centers, urban villages,~~)) regional centers, urban centers, neighborhood centers, and Station Area Overlay Districts in order to establish multifamily neighborhoods of low scale and density.

B. Locational ((~~Criteria~~)) criteria. The LR2 zone is most appropriate in areas generally characterized by the following conditions:

1. The area is either:

a. ((~~located~~)) Located in ((~~an urban center, urban village,~~)) a regional center, an urban center, a neighborhood center, or a Station Area Overlay District where new development could help establish a multifamily neighborhood of small scale and density; or

b. ((~~located~~)) Located in or near ((~~an urban center, urban village,~~)) a regional center, an urban center, a neighborhood center, or a Station Area Overlay District, or on an arterial street, and is characterized by one or more of the following conditions:

1) ((~~small-scale~~)) Small-scale structures generally no more than ((~~35~~))40 feet in height that are compatible in scale with NR and LR1 zones;

2) ((~~the~~)) The area would provide a gradual transition between NR or LR1 zones and more intensive multifamily or neighborhood commercial zones; and

2. The area is characterized by local access and circulation conditions that accommodate low-density multifamily development;

3. The area has direct access to arterial streets that can accommodate anticipated vehicular circulation, so that traffic is not required to use streets that pass through lower density residential zones; and

4. The area is well supported by existing or projected facilities and services used by residents, including retail sales and services, parks, and community centers, and has good pedestrian access to these facilities.

Section 14. Section 23.34.020 of the Seattle Municipal Code, last amended by Ordinance 126855, is amended as follows:

23.34.020 Lowrise 3 (LR3) zone, function, and locational criteria

A. Functions. The dual functions of the LR3 zone are to:

1. ((~~provide~~)) Provide opportunities for a variety of multifamily housing types in existing multifamily neighborhoods, and along arterials that have a mix of small to moderate scale residential structures; and

2. ((~~accommodate~~)) Accommodate redevelopment in areas within ((~~urban centers, urban villages,~~)) regional centers, urban centers, neighborhood centers, and Station Area Overlay Districts in order to establish multifamily neighborhoods of moderate scale and density.

B. Locational ((~~Criteria~~)) criteria. The LR3 zone is most appropriate in areas generally characterized by the following conditions:

1. The area is either:

a. ((~~located~~)) Located in ((~~an urban center, urban village,~~)) a regional center, an urban center, a neighborhood center, or a Station Area Overlay District where new development could help establish a multifamily neighborhood of moderate scale and density((~~, except in the following urban villages: the Wallingford Residential Urban Village, the Eastlake Residential Urban Village, the Upper Queen Anne Residential Urban Village, the Morgan Junction Residential Urban Village, the Lake City Hub Urban Village, the Bitter Lake Village Hub Urban Village, and the Admiral Residential Urban Village; or~~)) ;

b. ((~~located~~)) Located in an existing multifamily neighborhood in or near ((~~an urban center, urban village,~~)) a regional center, an urban center, a neighborhood center, or a Station Area Overlay District, or on an arterial street, and characterized by a mix of structures of low and moderate scale;

c. On lots within 125 feet of a street with a frequent transit route; or

d. On a lot greater than 20,000 square feet that does not abut lots zoned Neighborhood Residential over a substantial area;

2. The area is near neighborhood commercial zones with comparable height and scale;

3. The area would provide a transition in scale between LR1 and/or LR2 zones and more intensive multifamily and/or commercial zones;

4. The area has street widths that are sufficient for two-way traffic and parking along at least one curb;

5. The area is well served by public transit;

6. The area ((~~has direct access to~~)) is located near arterial streets that can accommodate anticipated vehicular circulation((~~, so that traffic is not required to use streets that pass through lower density residential zones~~)) ;

7. The area is well supported by existing or projected facilities and services used by residents, including retail sales and services, parks, and community centers, and has good pedestrian access to these facilities.

* * *

Section 15. Section 23.34.024 of the Seattle Municipal Code, last amended by Ordinance 125791, is amended as follows:

23.34.024 Midrise (MR) zone, function, and locational criteria

* * *

B. Locational criteria

1. Threshold conditions. Subject to subsection 23.34.024.B.2, properties that may be considered for a Midrise designation are limited to the following:

a. Properties already zoned Midrise;

b. Properties in areas already developed predominantly to the intensity permitted by the Midrise zone; or

c. Properties within ((~~an urban center or urban village~~)) a regional center, an urban center, or a neighborhood center.

2. Environmentally critical areas. Except as stated in this subsection 23.34.024.B.2, properties designated as environmentally critical may not be rezoned to a Midrise designation, and may remain Midrise only in areas predominantly developed to the intensity of the Midrise zone. The preceding sentence does not apply if the environmentally critical area either:

a. Was created by human activity, or

b. Is a designated peat settlement; liquefaction, seismic, or volcanic hazard; flood-prone area; or abandoned landfill.

3. Other criteria. The Midrise zone designation is most appropriate in areas generally characterized by the following:

a. Properties that are adjacent to business and commercial areas with comparable height and bulk;

b. Properties in areas that are served by major arterials and where frequent transit service and street capacity could absorb the traffic generated by midrise development;

c. Properties in areas that are in close proximity to major employment centers;

d. Properties in areas that are in close proximity to open space and recreational facilities;

e. Properties in areas along arterials where topographic changes either provide an edge or permit a transition in scale with surroundings;

f. Properties in flat areas where the prevailing structure height is greater than 37 feet or where due to a mix of heights, there is no established height pattern;

g. Properties in areas with moderate slopes and views oblique or parallel to the slope where the height and bulk of existing structures have already limited or blocked views from within the multifamily area and upland areas;

h. Properties in areas with steep slopes and views perpendicular to the slope where upland developments are of sufficient distance or height to retain their views over the area designated for the Midrise zone; and

i. Properties in areas where topographic conditions allow the bulk of the structure to be obscured. Generally, these are steep slopes, 16 percent or more, with views perpendicular to the slope.

Section 16. Section 23.34.028 of the Seattle Municipal Code, last amended by Ordinance 123209, is amended as follows:

23.34.028 Highrise (HR) zone, function, and locational criteria((.))

* * *

B. Locational ((~~Criteria.~~)) criteria

1. Threshold ((~~Conditions~~)) conditions. Subject to subsection 23.34.028.B.2 ((~~of this section~~)), properties that may be considered for a Highrise designation are limited to the following:

a. Properties already zoned Highrise;

b. Properties in areas already developed predominantly to the intensity permitted by the Highrise zone; or

c. Properties within ((~~an urban center or urban village, where a neighborhood plan adopted or amended by the City Council after January 1, 1995 indicates that the area is appropriate for a Highrise zone designation~~)) a regional center or within the portion of an urban center that is located within a quarter mile of a light rail station.

2. Environmentally ((~~Critical Areas~~)) critical areas. Except as stated in this subsection 23.34.028.B.2, properties designated as environmentally critical may not be rezoned to a Highrise designation, and may remain Highrise only in areas predominantly developed to the intensity of the Highrise zone. The preceding sentence does not apply if the environmentally critical area either 1) was created by human activity, or 2) is a designated peat settlement, liquefaction, seismic or volcanic hazard, or flood prone area, or abandoned landfill.

3. Other ((~~Criteria~~)) criteria. The Highrise zone designation is most appropriate in areas generally characterized by the following:

a. Properties in areas that are served by arterials where transit service is good to excellent and street capacity is sufficient to accommodate traffic generated by highrise development;

b. Properties in areas that are adjacent to a concentration of residential services or a major employment center;

c. Properties in areas that have excellent pedestrian or transit access to downtown;

d. Properties in areas that have close proximity to open space, parks, and recreational facilities;

e. Properties in areas where no uniform scale of structures establishes the character and where highrise development would create a point and help define the character;

f. Properties in flat areas on the tops of hills or in lowland areas away from hills, where views would not be blocked by highrise structures;

g. Properties in sloping areas with views oblique or parallel to the slope where the height and bulk of existing buildings have already limited or blocked views from within the multifamily area and upland areas where the hillform has already been obscured by development.

Section 17. Section 23.34.074 of the Seattle Municipal Code, last amended by Ordinance 122311, is amended as follows:

23.34.074 Neighborhood Commercial 1 (NC1) zones, function, and locational criteria((.))

* * *

B. Locational ((~~Criteria~~)) criteria. A Neighborhood Commercial 1 zone designation is most appropriate on land that is generally characterized by the following conditions:

1. Outside of ((~~urban centers and urban villages,~~)) regional, urban, and neighborhood centers or within ((~~urban centers or urban villages where isolated or~~)) portions of urban or neighborhood centers that are peripheral to the primary business district and adjacent to low-density residential areas;

2. Located on streets with limited capacity, such as collector arterials;

3. No physical edges to buffer the residential areas;

4. Small parcel sizes;

5. Limited transit service.

Section 18. Section 23.34.076 of the Seattle Municipal Code, last amended by Ordinance 122311, is amended as follows:

23.34.076 Neighborhood Commercial 2 (NC2) zones, function, and locational criteria((,))

* * *

B. Locational ((~~Criteria~~)) criteria. A Neighborhood Commercial 2 zone designation is most appropriate on land that is generally characterized by the following conditions:

1. Primary business districts in ((~~residential urban villages~~)) urban or neighborhood centers, secondary business districts in ((~~urban~~)) regional centers or ((~~hub urban villages~~)) urban centers, or business districts((~~,~~)) outside of regional, urban, and neighborhood ((~~villages,~~)) centers that extend for more than approximately two blocks;

2. Located on streets with good capacity, such as principal and minor arterials, but generally not on major transportation corridors;

3. Lack of strong edges to buffer the residential areas;

4. A mix of small and medium sized parcels;

5. Limited or moderate transit service.

Section 19. Section 23.34.078 of the Seattle Municipal Code, last amended by Ordinance 122311, is amended as follows:

23.34.078 Neighborhood Commercial 3 (NC3) zones, function, and locational criteria((,))

* * *

B. Locational ((~~Criteria~~)) criteria. A Neighborhood Commercial 3 zone designation is most appropriate on land that is generally characterized by the following conditions:

1. The primary business district in ((~~an urban center or hub urban village~~)) a regional, urban, or neighborhood center;

2. Served by a principal arterial;

3. Separated from low-density residential areas by physical edges, less-intense commercial areas or more-intense residential areas;

4. Excellent transit service.

Section 20. Section 23.34.080 of the Seattle Municipal Code, last amended by Ordinance 122311, is amended as follows:

23.34.080 Commercial 1 (C1) zones, function, and locational criteria((.))

* * *

B. Locational ((~~Criteria~~)) criteria. A Commercial 1 zone designation is most appropriate on land that is generally characterized by the following conditions:

1. Outside of ((~~urban centers and urban villages~~)) regional, urban, and neighborhood centers or((,)) within ((~~urban centers and urban villages,~~)) regional, urban, and neighborhood centers on lots having a C1 designation and either abutting a state highway((,)) or in use as a shopping mall;

2. Retail activity in existing commercial areas;

3. Readily accessible from a principal arterial;

4. Presence of edges that buffer residential or commercial areas of lesser intensity, such as changes in street layout or platting pattern;

5. Predominance of parcels of 20,000 square feet or larger;

6. Limited pedestrian and transit access.

Section 21. Section 23.34.082 of the Seattle Municipal Code, last amended by Ordinance 122311, is amended as follows:

23.34.082 Commercial 2 (C2) zones, function, and locational criteria((.))

* * *

B. Locational ((~~Criteria~~)) criteria. A Commercial 2 zone designation is most appropriate on land that is generally characterized by the following conditions:

1. Outside of ((~~urban centers and urban villages~~)) regional, urban, and neighborhood centers or((~~,~~)) within ((~~urban centers or urban villages,~~)) regional, urban, and neighborhood centers on lots having a C2 designation and abutting a state highway;

2. Existing commercial areas characterized by heavy, non-retail commercial activity;

3. Readily accessible from a principal arterial;

4. Possibly adjacent to manufacturing/industrial zones;

5. Presence of edges that buffer residential or commercial areas of lesser intensity, such as changes in street layout or platting pattern;

6. Predominance of parcels of 30,000 square feet or larger;

7. Limited pedestrian and transit access.

Section 22. Section 23.34.086 of the Seattle Municipal Code, last amended by Ordinance 124475, is amended as follows:

23.34.086 Pedestrian designation (suffix P), function, and locational criteria

* * *

B. Locational criteria. Pedestrian-designated zones are most appropriate on land that is generally characterized by the following conditions:

1. Pedestrian district surrounded by residential areas or major activity centers; or a commercial node in ((~~an urban center or urban village~~)) a regional, urban, or neighborhood center;

2. NC zoned areas on both sides of an arterial, or NC zoned block fronts across an arterial from a park, ((~~major institution~~)) Major Institution, or other activity center; and

3. Excellent access for pedestrians, transit, and bicyclists.

Section 23. Section 23.34.099 of the Seattle Municipal Code, enacted by Ordinance 126862, is amended as follows:

23.34.099 Urban Industrial (UI) zone, function, and locational criteria

A. Function. An area that provides an integrated and healthy transition between core industrial areas and neighboring regional and urban ((~~villages~~)) centers, residential areas, and mixed-use areas. These areas contain a mix of affordable, small-scale places for light industry, makers, brewing and distilling, creative arts, and industry supporting ancillary retail, office, or research activity. This area also provides limited opportunities for workforce housing that supports industrial uses. The area functions as a place for residents and workers from nearby ((~~urban villages or centers~~)) urban centers or regional centers to patronize and experience unique local industrial businesses.

B. Locational criteria. Urban Industrial zone designation is most appropriate in areas generally characterized by all of the following:

1. Areas at the transition between core industrial areas in Maritime Manufacturing and Logistics zones and non-industrially zoned areas, ((~~urban villages, or centers~~)) urban centers, or regional centers.

2. Areas generally within designated Manufacturing/Industrial Centers (MICs), although UI zones could be located in limited instances outside of MICs.

3. Areas characterized by small parcel sizes and a variety of small existing industrial and nonindustrial structures.

Section 24. Section 23.34.100 of the Seattle Municipal Code, last amended by Ordinance 119484, is amended as follows:

23.34.100 Designation of ((~~Downtown~~)) downtown zones((~~.~~))

Rezones to a ((~~Downtown~~)) downtown zone designation shall be considered only for areas within the boundaries of the Downtown ((~~Urban~~)) Regional Center as shown on the Official Land Use Map.

Section 25. Section 23.34.108 of the Seattle Municipal Code, last amended by Ordinance 123589, is amended as follows:

23.34.108 Downtown Mixed Commercial (DMC) zone, function, and locational criteria

Locations appropriate for Downtown Mixed Commercial zone designation are consistent with the following:

A. Function. Areas characterized by lower scale office, retail, and commercial uses related to activity in the office core, retail core, or other moderate-scale commercial cores in the Downtown ((~~Urban~~)) Regional Center, and with use patterns that may include housing.

B. Scale and ((~~Character of Development~~)) character of development. Areas where buildings of moderate scale exist or are appropriate to provide a physical transition between more intensive commercial areas and surrounding lower scale commercial, mixed-use, or residential districts.

C. Transportation and ((~~Infrastructure Capacity~~)) infrastructure capacity. Areas within the Downtown ((~~Urban~~)) Regional Center having good but comparatively less accessibility to vehicular and transit systems than the Downtown office core. Transportation and other infrastructure capacities are capable of accommodating modest growth without major improvement.

D. Relationship to ((~~Surrounding Activity~~)) surrounding activity. Areas that provide for less intensive activity along the western and northern edges of the Downtown retail core and Downtown office core, or at other peripheral locations within the Downtown ((~~Urban~~)) Regional Center. These areas provide a buffer to less intensive areas, such as the Harborfront, Pike Place Market, Belltown residential area, or mixed-use areas north of Denny Way, or serve as a transition to less intensive commercial, residential, or industrial areas near the Downtown ((~~Urban~~)) Regional Center.

E. Heights. Downtown ((~~Mixed Commercial~~)) mixed commercial height designations provide desired transitions compatible with adjacent downtown districts and areas outside downtown.

Section 26. Section 23.34.110 of the Seattle Municipal Code, last amended by Ordinance 123589, is amended as follows:

23.34.110 Downtown Mixed Residential (DMR) zone, function, and locational criteria

Locations appropriate for Downtown Mixed Residential zone designation are consistent with the following:

* * *

F. Heights. Downtown ((~~Mixed Residential~~)) mixed residential building height designations may be applied to achieve subarea objectives. The lowest height designation generally encompasses the Belltown core, in areas characterized by existing modest scale development, buildings of historic character, or topographic features such as the bluff rising from Elliott Bay. The intermediate building height designation provides transition in height and density to the north and east of the Belltown core and along the bluff where waterfront development divides the area from Elliott Bay. In the Downtown ((~~Urban~~)) Regional Center east

of Interstate 5, the building height designation provides for low to moderate heights. The highest building height designation applies to areas characterized by larger residential and commercial buildings, generally along the eastern edge of Belltown, near the higher density mixed commercial areas of downtown.

Section 27. Section 23.34.128 of the Seattle Municipal Code, last amended by Ordinance 124883, is amended as follows:

23.34.128 Seattle Mixed (SM) zone, function, and locational criteria

In considering rezones to the SM zone designation, the following function and locational criteria shall be taken into consideration:

A. Function. An area within ((~~an urban center, urban village,~~)) a regional center, an urban center, or a station area overlay district that provides for a wide range of uses to encourage development of the area into a mixed-use neighborhood with a pedestrian orientation;

* * *

Section 28. Section 23.40.070 of the Seattle Municipal Code, enacted by Ordinance 125612, is amended as follows:

23.40.070 2030 Challenge High Performance Existing Building Pilot Program

* * *

B. Minimum standards. A project shall qualify for the 2030 Challenge High Performance Existing Building Pilot Program if:

1. It is located within an ((~~urban~~)) regional center excluding lots within the shoreline jurisdiction, and lots within the International Special Review District.

2. It is reviewed in accordance with the full design review process provided in Section 23.41.014, except for development subject to special district review under Chapter 23.66

or historic review under Chapters 25.12 through 25.30, in which case the applicable review board shall conduct the design review with the authority to recommend design departures as provided to the Design Review Board pursuant to Section 23.41.012.

3. It includes renovation of an existing structure that complies with the provisions for substantial alterations in the Seattle Energy Code and the Seattle Existing Building Code.

4. It retains either the opaque portions of all exterior walls, or the superstructure of existing structures. The Director may allow openings in the exterior walls to be relocated or resized. For the purposes of this subsection 23.40.070.B, "superstructure" shall mean the foundation, structural frame, floor framing, and slabs of the structure.

5. Additions comply with the requirements of Table A for 23.40.070.

Table A for 23.40.070
Size of additions

Height limit of the zone	Minimum height of existing buildings	Maximum increase in area of existing building footprint
Zones with height limits of 85 feet or less	47 percent of the maximum height limit of the zone	20 percent of the area of the footprint of existing buildings
Zones with height limits greater than 85 feet	60 percent of the maximum height limit of the zone	

6. It meets all of the following:

a. Total annual building energy use that is 25 percent less than a baseline defined as the Energy Use Intensity (EUI) targets in the Target Performance Path of Seattle Energy Code Section C401.3;

b. None of the space heating and water heating in the project shall be provided using on-site combustion of fossil fuel;

c. Combined annual stormwater runoff and potable water use is 50 percent lower than the 2030 Challenge High Performance Existing Building Pilot Program baselines, which are as follows:

1) The stormwater baseline is the annual average rainfall on a development site in gallons to be calculated as follows: total site area in square feet x 2.1 feet (Seattle's average annual runoff depth) x 7.48 (conversion of cubic feet to gallons) = stormwater baseline;

2) The annual potable water baselines are shown in Table B for 23.40.070.

Table B for 23.40.070
Potable ((~~Water Baselines~~)) <u>water baselines</u>

Uses[1, 2]	**Potable ((~~Water Baseline Usage~~)) <u>water baseline usage</u> (gallons/square feet/year)**
Restaurant	125.99
Lodging uses	50.07
Multifamily residential use	41.14
Manufacturing uses	32.53
Nursing or assisted living facilities	30.11
Hospital	26.12
Sales and services, general	24.77
Medical services	21.00
Offices	14.21
Warehouses	13.00
Entertainment uses	12.88
Sales and services, automotive	11.74
Religious facilities	11.31
Schools elementary or secondary	11.09
College or university	11.00

Footnotes to Table B for 23.40.070
[1] If a use is not listed, the Director may determine that a proposed use is substantially similar to other uses listed.
[2] Baselines for a development are prorated by use based on the proportion of gross floor area occupied within the development.

d. The project exceeds 2014 mode share baselines such that the project meets mode share percentages pursuant to the <u>Seattle</u> Comprehensive Plan as shown in Tables C and D for 23.40.070 for trips made by travel modes other than driving alone for all work trips and non-work trips, respectively.

Table C for 23.40.070 Work ((~~Trips~~)) trips by modes other than driving alone		
((~~Urban Center~~)) Regional center	**2014 Mode ((~~Share Baselines~~)) share baselines**	**Mode ((~~Share~~)) share for ((~~Work Trips~~)) work trips**
Downtown	77 percent	85 percent
First Hill/Capitol Hill	58 percent	70 percent
Uptown	48 percent	60 percent
South Lake Union	67 percent	80 percent
University District	73 percent	85 percent
Northgate	30 percent	50 percent

Table D for 23.40.070 Non-work trips other than driving alone		
((~~Urban Center~~)) Regional center	**2014 Mode ((~~Share Baselines~~)) share baselines**	**Mode ((~~Share~~)) share for ((~~Non-Work Trips~~)) non-work trips**
Downtown	88 percent	90 percent
First Hill/Capitol Hill	80 percent	85 percent
Uptown	82 percent	85 percent
South Lake Union	76 percent	85 percent
University District	79 percent	90 percent
Northgate	46 percent	55 percent

* * *

Section 29. Section 23.41.004 of the Seattle Municipal Code, last amended by Ordinance 127100, is amended as follows:

23.41.004 Applicability

* * *

E. Temporary provisions

1. Developments with units provided on-site to comply with Chapter 23.58C through the performance option

a. A development proposal subject to design review under subsection 23.41.004.A that is complying with Chapter 23.58C solely through the performance option by providing affordable units on-site according to ((~~Section~~)) subsection 23.58C.050.C shall be

exempt from design review if the applicant files a valid and complete building permit application electing the exemption while this ordinance is in effect.

b. A development proposal subject to design review under subsection 23.41.004.A that is complying with Chapter 23.58C solely through the performance option by providing affordable units on-site according to ((~~Section~~)) subsection 23.58C.050.C that is vested according to Section 23.76.026 prior to August 14, 2023, may elect to be processed as allowed by ((~~Section~~)) this subsection 23.41.004.E.

c. The design review exemption under this subsection 23.41.004.E.1 shall be rescinded for a development proposal that changes from the performance option to the payment option at any time prior to issuance of a building permit.

d. Requests for departures. If a project subject to design review under subsection 23.41.004.A is exempt from design review according to this subsection 23.41.004.E.1, the Director may consider requests for departures from any development standard in this Title 23, except as otherwise limited in subsection 23.41.012.B.

e. Departures decision. Requests for departures according to subsection 23.41.004.E.1.d shall be evaluated and may be granted by the Director as a Type I decision if the departure would result in additional housing units being constructed.

2. Low-income housing

a. Notwithstanding any contrary provision of this Title 23, the Director may consider requests for departures from any development standard in this Title 23, except as otherwise limited in subsection 23.41.012.B, for low-income housing.

b. Departures decision. Requests for departures shall be evaluated by the Director, in consultation with the Office of Housing, in light of the particular population

designed to be served by the project, and may be granted by the Director as a Type I decision if the departure would result in additional housing units being constructed.

3. Downtown Activation Plan

a. A development proposal that is subject to design review according to this Section 23.41.004 shall be exempt from this Chapter 23.41, unless ineligible for exemption due to other code provisions, if:

1) The proposal includes residential use comprising at least 50 percent of its chargeable floor area, except if at least 50 percent of the chargeable floor area in nonresidential use is lodging then no residential use is required; or includes a research and development laboratory use; and

2) The proposal is located on a property within the Downtown ((~~Urban~~)) Regional Center, Uptown ((~~Urban~~)) Regional Center, South Lake Union ((~~Urban~~)) Regional Center, First Hill/Capitol Hill ((~~Urban~~)) Regional Center, or an area within the Greater Duwamish Manufacturing and Industrial Center, as shown on Map A for 23.41.004; or within an area included in an adopted expansion area of ((~~an urban~~)) a regional center or manufacturing and industrial center shown on Map A for 23.41.004; and

3) The applicant files a letter of eligibility for exemption pursuant to subsection 23.76.010.G, provided that permit application materials are subsequently filed per subsection 23.76.026.A.4; and

4) The proposal does not involve a Type IV or Type V Council land use decision.

b. Waiver or modification of development standard. If a project is exempt from design review according to this subsection 23.41.004.E.3, the Director may consider requests for waivers or modifications of the following development standards in Title 23:

1) Upper-level setbacks, modulation, articulation, facade opening requirements, and structure width;

2) Street-level setbacks and facade setbacks: dimensional and area limits;

3) Floor-to-floor height requirements at street level, except as otherwise limited in subsection 23.41.012.B;

4) Rooftop screening and coverage limits in relation to mechanical equipment, energy-related features, elevator equipment, and related enclosures;

5) Street-level use type, minimum depth, and percent presence on street-level, street-facing facade requirements;

6) Facade transparency and blank facade requirements;

7) Overhead weather protection requirements;

8) Requirements for the size and design of common recreational areas, amenity areas, community rooms, and similar indoor amenities, but not including required outdoor open space requirements;

9) Open space and open areas: dimensional, area, distribution of types, and amount of overhead coverage requirements, except standards for open space amenities provided to meet requirements of Chapter 23.58A;

10) Landscaping: dimensional, area, and location requirements;

11) Minimum dimensions and slope of vehicle access;

12) Parking space size requirements in subsections 23.54.030.A and 23.54.030.B;

13) Bicycle parking minimum quantity requirements in Table D for 23.54.015; and

14) Provisions of the MPC-YT zone, except: affordable housing production requirements in Section 23.75.085; limits on floor area for uses in Sections 23.75.040, 23.75.085, or 23.75.090; and limits on the number of highrise structures, distribution of highrise structures, and gross floor area per story for highrise structures in Section 23.75.040 or Section 23.75.120.

c. Decision on waiver or modification of development standards. Requests for waiver or modification of development standards according to subsection 23.41.004.E.3.b shall be evaluated by the Director and may be granted by the Director as a Type I decision if a waiver or modification of development standards would result in an increased number of dwelling units, lodging rooms, or increased floor area of a research and development laboratory use, being constructed.

* * *

Section 30. Section 23.41.012 of the Seattle Municipal Code, last amended by Ordinance 127099, is amended as follows:

23.41.012 Development standard departures

* * *

B. Departures may be granted from any Land Use Code standard or requirement, except for the following:

* * *

11. Structure height, except that:

a. Within the Roosevelt Commercial Core building height departures up to an additional 3 feet may be granted for properties zoned NC3-75 (Map A for 23.41.012, Roosevelt Commercial Core);

b. Within the Uptown ((~~Urban~~)) Regional Center building height departures up to 3 feet of additional height may be granted if the top floor of the structure is set back at least 6 feet from all lot lines abutting streets;

c. Within the Upper Queen Anne ((~~Residential Urban Village~~)) Urban Center and Neighborhood Commercial zones as shown on Map B for 23.41.012, Upper Queen Anne Commercial Areas, building height departures up to 3 feet of additional height may be granted if the top floor of the structure is set back at least 6 feet from all lot lines abutting streets;

d. Within the PSM 85-120 zone in the area shown on Map A for 23.49.180, departures may be granted from development standards that apply as conditions to additional height, except for floor area ratios and provisions for adding bonus floor area above the base FAR;

e. Within the Pike/Pine Conservation Overlay District shown on Map A for 23.73.004, departures may be granted from:

1) Development standards that apply as conditions to additional height in subsections 23.73.014.A and 23.73.014.B; and

2) The provision for receiving sites for transfer of development potential in subsection 23.73.024.B.5;

f. Departures of up to 10 feet of additional height may be granted if the applicant demonstrates that:

1) The departure is needed to protect a tree that is located on the lot that is either a Tier 1 or Tier 2 tree, as defined in Section 25.11.130; and

2) Avoiding development in the tree protection area will reduce the total development capacity of the site;

g. In Midrise and Highrise zones, Seattle Mixed, and in all commercial and ((~~Downtown~~)) downtown zones, departures for rooftop features may be granted from rooftop coverage limits and setback standards from the roof edge, but not from the height limits for rooftop features.

* * *

Section 31. Section 23.42.058 of the Seattle Municipal Code, last amended by Ordinance 127099, is amended as follows:

23.42.058 Cannabis

* * *

C. Major cannabis activity is allowed in all other zones if the activity and site meet the following requirements:

1. The person operating the major cannabis activity must have a current license issued by the State of Washington pursuant to Title 69 RCW authorizing the person to produce, process, or sell, at the proposed site, cannabis, cannabis-infused products, useable cannabis, or cannabis concentrates, or to research or test any of those products at the proposed site for quality assurance pursuant to Title 69 RCW;

2. Any lot line of property having a major cannabis activity must be 1,000 feet or more from any lot line of property on which any of the following uses as defined in WAC 314-55-010 is located: elementary school; secondary school; or playground;

3. Any lot line of property having a major cannabis activity that includes the retail sale of cannabis products, except that in Downtown Mixed Residential and Downtown Mixed Commercial zones within that portion of the Downtown ((~~Urban~~)) Regional Center that is west of Interstate 5, north of Yesler Way, and south of Denny Way major cannabis activity that includes the retail sale of cannabis products must be 250 feet or more, must be 500 feet or more from any lot line of property on which any of the following uses as defined in WAC 314-55-010 is established and operating: child care center; game arcade; library; public park; public transit center; or recreation center or facility;

4. Any lot line of property having a major cannabis activity that does not include the retail sale of cannabis products must be 250 feet or more from any lot line of property on which any of the following uses as defined in WAC 314-55-010 is established and operating: child care center; game arcade; library; public park; public transit center; or recreation center or facility;

5. No more than two properties with major cannabis activity that includes the retail sale of cannabis products are allowed within ((~~1000~~)) 1,000 feet of each other; where any lot lines of two properties with existing major cannabis activity that includes the retail sale of cannabis products are located within ((~~1000~~)) 1,000 feet of each other, any lot line of another property with a new major cannabis activity that includes the retail sale of cannabis products must be ((~~1000~~)) 1,000 feet or more from the closest lot line of the property containing existing major cannabis activity that includes the retail sale of cannabis products;

6. Whether a major cannabis activity complies with the locational requirements prescribed by subsections 23.42.058.C.2, 23.42.058.C.3, 23.42.058.C.4, or 23.42.058.C.5 shall

be based on facts that exist on the date of application to the Washington State Liquor and Cannabis Board issues a "Notice of Cannabis Application" to The City of Seattle.

Section 32. Section 23.44.019 of the Seattle Municipal Code, last amended by Ordinance 126855, is amended as follows:

23.44.019 Alternative standards for development of affordable units on property owned or controlled by a religious organization

In lieu of meeting development standards contained in subsection 23.44.010.A (minimum lot area), subsection 23.44.010.C (maximum lot coverage), subsection 23.44.011.B (floor area), subsection 23.44.012.A (height), and Section 23.44.017 (density), a proposed development that meets the requirements of Section 23.42.055 and subsection 23.44.019.A may elect to meet the alternative development standards in subsection 23.44.019.B through subsection 23.44.019.F.

A. Lot requirements

1. Development on a lot that meets one of the following criteria, but does not meet the additional requirements in subsection 23.44.019.A.2, may meet the alternative development standards in subsection 23.44.019.B and subsection 23.44.019.D through subsection 23.44.019.F:

a. The lot has or abuts a lot with a religious facility or other use accessory to a religious facility; or

b. The lot area is 10,000 square feet or greater; or

c. The lot is in an RSL zone.

2. Development on a lot that meets the following additional requirements may meet the alternative development standards in subsection 23.44.019.C ((~~and subsection 23.44.019.D~~)) through subsection 23.44.019.F:

a. The lot area is 10,000 square feet or greater;

b. The lot is in an urban ((~~village~~)) center, within 1/4 mile (1,320 feet) of an urban ((~~village~~)) center, or within 1/4 mile (1,320 feet) of a transit stop or station served by a frequent transit route on the map required by subsection 23.54.015.B.4; and

c. The lot meets one of the following locational criteria:

1) The lot abuts, is located on a block front with, or is located across a right-of-way from a zone not designated a neighborhood residential zone; or

2) No lot line is located within 50 feet of a single-family dwelling unit.

* * *

Section 33. Section 23.45.509 of the Seattle Municipal Code, last amended by Ordinance 125791, is amended as follows:

23.45.509 Standards applicable to specific areas

* * *

B. University ((~~Community Urban~~)) District Regional Center. The following provisions apply to development in the MR (M1) zone.

1. Lots located in MR (M1) zones are eligible as Landmark TDR and TDP sending sites if the lot meets the definition of the applicable TDR or TDP sending site in Chapter 23.84A and meets all applicable standards in Section 23.58A.042.

2. The maximum amount of TDR and TDP that can be transferred from an eligible sending site shall not exceed an amount of floor area equivalent to the numerical value of the FAR permitted on a lot, multiplied by the lot area of the sending site and minus the sum of any chargeable floor area on the lot plus any TDR and TDP previously transferred.

3. Eligible receiving sites are limited to those lots in SM-U zones specified in subsection 23.48.623.C.

* * *

Section 34. Section 23.45.510 of the Seattle Municipal Code, last amended by Ordinance 127099, is amended as follows:

23.45.510 Floor area

* * *

B. Floor area ratio (FAR) limits in LR and MR zones. FAR limits apply in LR and MR zones as shown in Table A for 23.45.510((-)), provided that if the LR zone designation includes an incentive zoning suffix, then gross floor area may exceed the base FAR as identified in the suffix designation, up to the limits shown in Table A for 23.45.510, if the applicant complies with Chapter 23.58A, Incentive Provisions. The applicable FAR limit applies to the total chargeable floor area of all structures on the lot.

Table A for 23.45.510
FAR limits in LR and MR zones

Zone	Zones with an MHA suffix	Zones without an MHA suffix
LR1	1.3	1.0
LR2	1.4[1]	1.1
LR3 outside ((~~urban centers and urban villages~~)) regional centers and urban centers	1.8	1.2, except 1.3 for apartments
LR3 inside ((~~urban centers and urban villages~~)) regional centers and urban centers	2.3	1.2, except 1.5 for apartments
MR	4.5	3.2

Footnote to Table A for 23.45.510
[1] Except that the FAR is 1.6 for apartments that provide one or more outdoor amenity areas meeting the requirements of Section 23.45.522 and the following provisions are met:
1. The total amount of, outdoor amenity area is equal to at least 35 percent of the lot area;
2. No part of such amenity area has a width or depth of less than 20 feet; and
3. The outdoor amenity area is located at ground level or within 4 feet of finished grade.

* * *

D. The following floor area is exempt from FAR limits:

* * *

11. In the Northgate ((~~Urban~~)) Regional Center, up to 15,000 square feet of floor area in residential use in a structure built prior to 1990 that is located on a split-zoned lot of at least 40,000 square feet in size.

* * *

Section 35. Section 23.45.514 of the Seattle Municipal Code, last amended by Ordinance 126685, is amended as follows:

23.45.514 Structure height

A. Subject to the additions and exceptions allowed as set forth in this Section 23.45.514, the height limits for structures in LR zones are as shown on Table A for 23.45.514.

Table A for 23.45.514
Structure height for LR zones (in feet)

Housing type	**LR1**	**LR2**	**LR3 outside ((~~urban centers, urban villages,~~)) regional centers, urban centers, and Station Area Overlay Districts**	**LR3 in ((~~urban centers, urban villages,~~)) regional centers, urban centers, and Station Area Overlay Districts**
Cottage housing developments	22	22	22	22
Rowhouse and townhouse developments	30	40[1]	40[1]	50[1]
Apartments	30	40[1]	40[1]	50[2]

Footnotes for Table A for 23.45.514
[1] Except that the height limit is 30 feet in zones without a mandatory housing affordability suffix.
[2] Except that the height limit is 40 feet in zones without a mandatory housing affordability suffix.

* * *

Section 36. Section 23.45.516 of the Seattle Municipal Code, last amended by Ordinance 127099, is amended as follows:

23.45.516 Method to achieve extra residential floor area in HR zones

* * *

E. Neighborhood green street setback. Floor area may be gained for a neighborhood green street setback according to the provisions of Chapter 23.58A by development on lots abutting one of the streets or street segments within the First Hill/Capitol Hill ((~~Urban Village~~)) Regional Center shown on Map A for 23.45.516.

* * *

Section 37. Section 23.45.527 of the Seattle Municipal Code, last amended by Ordinance 126509, is amended as follows:

23.45.527 Structure width and ((~~façade~~)) facade length limits in LR zones

A. Structure width in LR zones may not exceed the width indicated on Table A for 23.45.527.

((~~Table A for 23.45.527: Maximum Structure Width in LR zones in feet~~))

Table A for 23.45.527 Maximum structure width in LR zones (in feet)			
Zone	**Width in feet by ((~~Category of Residential Use~~)) category of residential use**		
	Cottage ((~~Housing and Rowhouse Developments~~)) housing and rowhouse developments	**Townhouse ((~~Developments~~)) developments**	**Apartments**
LR1	No limit	60	45
LR2	No limit	90	90

Table A for 23.45.527
Maximum structure width in LR zones (in feet)

Zone	Width in feet by ((~~Category of Residential Use~~)) category of residential use		
	Cottage ((~~Housing and Rowhouse Developments~~)) housing and rowhouse developments	Townhouse ((~~Developments~~)) developments	Apartments
LR3 outside ((~~Urban Villages, Urban Centers~~)) regional centers, urban centers, or Station Area Overlay Districts	No limit	120	120
LR3 inside ((~~Urban Villages, Urban Centers~~)) regional centers, urban centers, or Station Area Overlay Districts	No limit	150	150

* * *

Section 38. Section 23.45.530 of the Seattle Municipal Code, enacted by Ordinance 125791, is amended as follows:

23.45.530 Green building standards

For projects exceeding the floor area ratio (FAR) in Table A for 23.45.530, the applicant shall make a commitment that the proposed development will meet the green building standard and shall demonstrate compliance with that commitment, all in accordance with Chapter 23.58D.

Table A for 23.45.530
Green building standard thresholds for multifamily zones

Zone	Floor ((~~Area Ratio~~)) area ratio (FAR)
LR1	1.1
LR2	1.2
LR3 outside ((~~urban centers and urban villages~~)) regional centers and urban centers	1.6

Table A for 23.45.530 Green building standard thresholds for multifamily zones	
Zone	**Floor ((~~Area Ratio~~)) area ratio (FAR)**
LR3 inside ((~~urban centers and urban villages~~)) regional centers and urban centers	1.8
MR	3.45
HR	7.0

Section 39. Section 23.45.532 of the Seattle Municipal Code, last amended by Ordinance 125791, is amended as follows:

23.45.532 Standards for ground floor commercial uses in MR and HR zones

A. All ground-floor commercial uses permitted pursuant to Section 23.45.504, except medical service uses permitted pursuant to Section 23.45.506, shall meet the following conditions:

1. Structures with ground floor commercial uses in zones that include an RC designation shall comply with Chapter 23.46.

2. The commercial use is permitted only on the ground floor of a structure that contains at least one dwelling unit. On sloping lots, the commercial use may be located at more than one level within the structure as long as the floor area in commercial use does not exceed the area of the structure's footprint.

3. The maximum size of use of any one business establishment is 4,000 square feet, except as follows:

a. ((~~the~~)) The maximum size of use of a multi-purpose retail sales establishment is 10,000 square feet; and

b. ((~~the~~)) The maximum size of a medical service use located in the Northgate ((~~Urban~~)) Regional Center is 10,000 square feet.

4. Vents for venting of odors, vapors, smoke, gas and fumes, and exterior heat exchangers and other similar devices (e.g., related to ventilation, air-conditioning, refrigeration) shall be at least 10 feet above finished sidewalk grade, and directed away to the extent possible from residential uses within 50 feet of the vent.

* * *

Section 40. Section 23.45.550 of the Seattle Municipal Code, last amended by Ordinance 126855, is amended as follows:

23.45.550 Alternative ((~~Standards~~)) <u>standards</u> for development of affordable units on property owned or controlled by a religious organization

In lieu of meeting development standards contained in subsections 23.45.510.B and 23.45.510.C (floor area), subsections 23.45.512.A and 23.45.512.B (density), and subsections 23.45.514.A and 23.45.514.B (height), a proposed development that meets the requirements of Section 23.42.055 may elect to meet the alternative development standards in this Section 23.45.550.

A. Floor area

1. Development permitted pursuant to Section 23.42.055 is subject to the FAR limits as shown in Table A for 23.45.550.

Table A for 23.45.550
FAR limits for development permitted pursuant to Section 23.42.055

Zone	Base FAR	Maximum additional exempt FAR[1]
LR1	1.5	0.3
LR2	1.8	0.3
LR3 outside ((~~urban centers and urban villages~~)) <u>regional centers and urban centers</u>	2.5	0.5
LR3 inside ((~~urban centers and urban villages~~)) <u>regional centers and urban centers</u>	3.25	0.5
MR	5.0	0.5
HR	16	1.0

Table A for 23.45.550 **FAR limits for development permitted pursuant to Section 23.42.055**		
Zone	**Base FAR**	**Maximum additional exempt FAR[1]**
Footnote to Table A for 23.45.550 [1] Gross floor area for uses listed in subsection 23.45.550.B.2 are exempt from FAR calculations up to this amount.		

2. In addition to the FAR exemptions in subsection 23.45.510.D, an additional FAR exemption up to the total amount specified in Table A for 23.45.550 is allowed for any combination of the following floor area:

a. Floor area in units with two or more bedrooms and a minimum net unit area of 850 square feet;

b. Floor area of a religious facility; and

c. Floor area in a structure designated as a Landmark pursuant to Chapter 25.12; and

d. Any floor area in a development located within ((~~1/4~~)) one-quarter mile (1,320 feet) of a transit stop or station served by a frequent transit route as defined in subsection 23.54.015.B.4.

3. Split-zoned lots

a. On lots located in two or more zones, the FAR limit for the entire lot shall be the highest FAR limit of all zones in which the lot is located, provided that:

1) At least 65 percent of the total lot area is in the zone with the highest FAR limit;

2) No portion of the lot is located in a neighborhood residential zone; and

3) A minimum setback of 10 feet applies for any lot line that abuts a lot in a neighborhood residential zone.

b. For the purposes of this subsection 23.45.550.A.3, the calculation of the percentage of a lot or lots located in two or more zones may include lots that abut and are in the same ownership at the time of the permit application.

B. Maximum height

1. Development permitted pursuant to Section 23.42.055 is subject to the height limits as shown in Table B for 23.45.550.

Table B for 23.45.550
Structure height for development permitted pursuant to Section 23.42.055

Zone	Height limit (in feet)
LR1	40
LR2	50
LR3 outside ((~~urban centers and urban villages~~)) regional centers and urban centers	55
LR3 inside ((~~urban centers and urban villages~~)) regional centers and urban centers	65
MR	95
HR	480

2. Split-zoned lots

a. On lots located in two or more zones, the height limit for the entire lot shall be the highest height limit of all zones in which the lot is located, provided that:

1) At least 65 percent of the total lot area is in the zone with the highest height limit;

2) No portion of the lot is located in a neighborhood residential zone; and

3) A minimum setback of 10 feet applies for any lot line that abuts a lot in a neighborhood residential zone.

b. For the purposes of this subsection 23.45.550.B.2, the calculation of the percentage of a lot or lots located in two or more zones may include lots that abut and are in the same ownership at the time of the permit application.

* * *

Section 41. Section 23.47A.004 of the Seattle Municipal Code, last amended by Ordinance 127099, is amended as follows:

23.47A.004 Permitted and prohibited uses

* * *

D. Public facilities

1. Uses in public facilities that are most similar to uses permitted outright or permitted as a conditional use under this Chapter 23.47A are permitted outright or as a conditional use, respectively, subject to the same use regulations, development standards, and conditional use criteria that govern the similar uses.

2. Permitted uses in public facilities requiring council approval. Unless specifically prohibited in Table A for 23.47A.004, uses in public facilities that are not similar to uses permitted outright or permitted as a conditional use under this Chapter 23.47A, may be permitted by the ((~~City~~)) Council.

3. In all NC zones and C zones, uses in public facilities not meeting development standards may be permitted by the Council, and the Council may waive or grant departures from development standards, if the following criteria are satisfied:

a. The project provides unique services that are not provided to the community by the private sector, such as police and fire stations;

b. The proposed location is required to meet specific public service delivery needs;

c. The waiver of or departure from the development standards is necessary to meet specific public service delivery needs; and

d. The relationship of the project to the surrounding area has been considered in the design, siting, landscaping, and screening of the facility.

4. The ((~~City~~)) Council's use approvals, and waivers of or grants of departures from applicable development standards or conditional use criteria, contemplated by subsections 23.47A.004.D.2 and 23.47A.004.D.3, are governed by the provisions of Chapter 23.76, Subchapter III((~~, Council Land Use Decisions~~)).

5. Expansion of uses in public facilities

a. Major expansion. Major expansion of uses in public facilities allowed pursuant to subsections 23.47A.004.D.1, 23.47A.004.D.2, and 23.47A.004.D.3 may be permitted according to the criteria and process in those subsections 23.47A.004.D.1, 23.47A.004.D.2, and 23.47A.004.D.3. A major expansion of a public facility use occurs when an expansion would not meet development standards or the area of the expansion would exceed either 750 square feet or 10 percent of the existing area of the use, whichever is greater. For the purposes of this subsection 23.47A.004.D, area of use includes gross floor area and outdoor area devoted actively to that use, other than as parking.

b. Minor expansion. An expansion of a use in a public facility that is not a major expansion is a minor expansion. Minor expansions to uses in public facilities allowed pursuant to subsections 23.47A.004.D.1, 23.47A.004.D.2, and 23.47A.004.D.3 ((~~above~~)) may be permitted according to the provisions of Chapter 23.76, for a Type I Master Use Permit.

6. Essential public facilities. Permitted essential public facilities will be reviewed according to the provisions of Chapter 23.80((~~, Essential Public Facilities~~)).

7. Youth service centers existing as of January 1, 2013, in public facilities operated by King County within ((~~Urban Center Villages~~)) regional centers and replacements, additions, or expansions to such King County public facilities are permitted in NC3 zones.

* * *

G. Live-work units

1. In all NC zones and C zones live-work units are permitted outright subject to the provisions of this Title 23.

2. In pedestrian-designated zones, live-work units shall not occupy more than 20 percent of the street-level, street-facing facade along designated principal pedestrian streets listed in subsection 23.47A.005.D.

3. In the Lake City and Bitter Lake ((~~Village Hub Urban Villages~~)) Urban Centers, live-work units shall not occupy more than 20 percent of the street-level, street-facing facade.

4. Except where expressly treated as a residential use, live-work units shall be deemed a nonresidential use.

* * *

Table A for 23.47A.004 Uses in Commercial zones					
	Permitted and prohibited uses by zone[1]				
Uses	**NC1**	**NC2**	**NC3**	**C1**	**C2**
* * *					
C. COMMERCIAL USES[3]					
C.1. Animal shelters and kennels	X	X	X	X	P
C.2. Eating and drinking establishments					

Table A for 23.47A.004 **Uses in Commercial zones**						
			Permitted and prohibited uses by zone[1]			
Uses			**NC1**	**NC2**	**NC3**	**C1**	**C2**
		C.2.a. Drinking establishments	CU-10	CU-25	P	P	P
		C.2.b. Restaurants	10	25	P	P	P
	C.3. Entertainment uses						
		C.3.a. Cabarets, adult[4]	X	P	P	P	P
		C.3.b. Motion picture theaters, adult	X	X	X	X	X
		C.3.c. Panorams, adult	X	X	X	X	X
		C.3.d. Sports and recreation, indoor	10	25	P	P	P
		C.3.e. Sports and recreation, outdoor	X	X	X[5]	P	P
		C.3.f. Theaters and spectator sports facilities	X	25	P	P	P
	C.4. Food processing and craft work[2]		10	25	25	P	P
	C.5. Laboratories, research and development		10	25	P	P	P
	C.6. Lodging uses		X[6]	CU-25[6]	P	P	P
	C.7. Medical services[7]		10[8]	25	P	P	P
	C.8. Offices		10	25	P	35[9]	35[9]
	C.9. Sales and services, automotive						
		C.9.a. Retail sales and services, automotive	10[10]	25[10]	P[10]	P	P
		C.9.b. Sales and rental of motorized vehicles	X	25	P	P	P
		C.9.c. Vehicle repair, major automotive	X	25	P	P	P
	C.10. Sales and services, general[2]						
		C.10.a. Retail sales and services, general[2]	10	25	P	P	P
		C.10.b. Retail sales, multipurpose	10[11]	50	P	P	P
	C.11. Sales and services, heavy						
		C.11.a. Commercial sales, heavy	X	X	25	P	P
		C.11.b. Commercial services, heavy	X	X	X	P	P
		C.11.c. Retail sales, major durables	10	25	P	P	P
		C.11.d. Retail sales and services, non-household	10	25	P	P	P
		C.11.e. Wholesale showrooms	X	X	25	25	P
	C.12. Sales and services, marine						
		C.12.a. Marine service stations	10	25	P	P	P
		C.12.b. Sales and rental of large boats	X	25	P	P	P
		C.12.c. Sales and rental of small boats, boat parts and accessories	10	25	P	P	P
		C.12.d. Vessel repair, major	X	X	X	S	S
		C.12.e. Vessel repair, minor	10	25	P	P	P
* * *							

Table A for 23.47A.004 **Uses in Commercial zones**					
	Permitted and prohibited uses by zone[1]				
Uses	**NC1**	**NC2**	**NC3**	**C1**	**C2**
((~~KEY~~)) Key to Table A for 23.47A.004 A = Permitted as an accessory use only CU = Administrative Conditional Use (business establishment limited to the multiple of 1,000 square feet of any number following a hyphen, pursuant to Section 23.47A.010) CCU = Council Conditional Use (business establishment limited to the multiple of 1,000 square feet of any number following a hyphen, pursuant to Section 23.47A.010) P = Permitted S = Permitted in shoreline areas only X = Prohibited CU-25 = Conditionally permitted; use is limited to 25,000 square feet, pursuant to Section 23.47A.010 10 = Permitted, business establishments limited to 10,000 square feet, pursuant to Section 23.47A.010 20 = Permitted, business establishments limited to 20,000 square feet, pursuant to Section 23.47A.010 25 = Permitted, business establishments limited to 25,000 square feet, pursuant to Section 23.47A.010 35 = Permitted, business establishments limited to 35,000 square feet, pursuant to Section 23.47A.010 40 = Permitted, business establishments limited to 40,000 square feet, pursuant to Section 23.47A.010 50 = Permitted, business establishments limited to 50,000 square feet, pursuant to Section 23.47A.010					
Footnotes to Table A for 23.47A.004 [1] In pedestrian-designated zones, a portion of the street-level, street-facing facade of a structure along a designated principal pedestrian street may be limited to certain uses as provided in subsection 23.47A.005.D. In pedestrian-designated zones, drive-in lanes are prohibited (Section 23.47A.028). [2] In addition to the provisions in this Chapter 23.47A, uses that entail major cannabis activity are subject to the requirements of Section 23.42.058. [3] For commercial uses with drive-in lanes, see Section 23.47A.028. [4] Subject to subsection 23.47A.004.H. [5] Permitted at Seattle Center. [6] Bed and breakfasts in existing structures are permitted outright with no maximum size limit. [7] Medical services over 10,000 square feet within 2,500 feet of a medical Major Institution Overlay boundary require conditional use approval, unless they are included in a Major Institution Master Plan or dedicated to veterinary services. [8] Medical service uses that are located in ((~~an urban center or urban village~~)) a regional center or an urban center, which are in operation at such location before August 1, 2015, and that routinely provide medical services on a reduced fee basis to individuals or families					

Table A for 23.47A.004 Uses in Commercial zones					
	Permitted and prohibited uses by zone[1]				
Uses	**NC1**	**NC2**	**NC3**	**C1**	**C2**
having incomes at or below 200 percent of the poverty guidelines updated periodically in the Federal Register by the U.S. Department of Health and Human Services under the authority of 42 USC 9902(2), are limited to 20,000 square feet. This provision does not apply to medical service uses that are subject to a Major Institution Master Plan. [9] Office uses in C1 and C2 zones are permitted up to the greater of 1 FAR or 35,000 square feet as provided in subsection 23.47A.010.D. Office uses in C1 and C2 zones are permitted outright with no maximum size limit if they meet the standards identified in subsection 23.47A.010.D.					
[10] Gas stations and other businesses with drive-in lanes are not permitted in pedestrian-designated zones (Section 23.47A.028). Elsewhere in NC zones, establishing a gas station may require a demonstration regarding impacts under Section 23.47A.028. [11] Grocery stores meeting the conditions of subsection 23.47A.010.E are permitted up to 23,000 square feet in size. [12] Subject to subsection 23.47A.004.G. [13] Permitted pursuant to subsection 23.47A.004.D.7. [14] Residential uses may be limited to 20 percent of a street-level, street-facing facade pursuant to subsection 23.47A.005.C. [15] Residential uses are conditional uses in C2 zones under subsection 23.47A.006.A.3, except as otherwise provided above in Table A for 23.47A.004 or in subsection 23.47A.006.A.3. [16] Permitted at Seattle Center; see Section 23.47A.011. [17] Flexible-use parking is subject to Section 23.54.026. In pedestrian-designated zones, surface parking is prohibited adjacent to principal pedestrian streets pursuant to subsection 23.47A.032.B.2. [18] Permitted as surface parking only on surface parking lots existing as of January 1, 2017. In pedestrian-designated zones, surface parking is prohibited adjacent to principal pedestrian streets pursuant to subsection 23.47A.032.B.2. [19] Permitted outright, except prohibited in the SAOD. [20] See Chapter 23.57, Communications regulations, for regulation of communication utilities. [21] A recycling use that is located on the same development site as a solid waste transfer station may be permitted by administrative conditional use, subject to the requirements of subsection 23.47A.006.A.7.					

Section 42. Section 23.47A.005 of the Seattle Municipal Code, last amended by Ordinance 126855, is amended as follows:

23.47A.005 Street-level uses

* * *

C. Residential uses at street level

1. In all NC and C zones, residential uses may occupy, in the aggregate, no more than 20 percent of the street-level, street-facing facade in the following circumstances or locations:

a. In a pedestrian-designated zone, facing a designated principal pedestrian street; or

b. In all NC and C1 zones within the Bitter Lake ((~~Village Hub Urban Village~~)) Urban Center, except lots abutting Linden Avenue North, north of North 135th Street; or

c. Within a zone that has a height limit of 85 feet or higher, except as provided in subsection 23.47A.005.C.2; or

d. Within an NC1 zone, except as provided in subsection 23.47A.005.C.2; or

e. In all NC and C1 zones within the Northgate Overlay District, except as provided in Section 23.71.044; or

f. In all NC and C1 zones within the areas shown on Maps A through D for 23.47A.005 ((~~at the end of this Chapter 23.47A~~)) when facing an arterial street.

2. Subsection 23.47A.005.C.1 notwithstanding, there is no restriction on the location of residential uses in the following circumstances:

a. The development is low-income housing; or

b. The residential use is an assisted living facility or nursing home and private living units are not located at street level; or

c. Within the Pike/Pine Conservation Overlay District, for street-facing facades that do not face a designated principal pedestrian street, as shown on Map A for 23.73.008; or

d. In a structure existing on January 1, 2012, that is within an NC1 zone but not located in an area defined in Maps A through D for 23.47A.005, ((~~at the end of this Chapter 23.47A,~~)) a live-work space may be converted to an accessory dwelling unit if the residential use is established, if the area proposed to be converted meets the minimum housing standards of Chapter 22.206.

3. Additions to, or on-site accessory structures for, existing single-family structures are permitted outright.

4. Where residential uses at street level are limited to 20 percent of the street-level, street-facing facade, such limits do not apply to residential structures separated from the street lot line by an existing structure meeting the standards of this Section 23.47A.005 and Section 23.47A.008, or by an existing structure legally nonconforming to those standards.

D. In pedestrian-designated zones the locations of uses are regulated as follows:

1. Along designated principal pedestrian streets, one or more of the following uses are required along 80 percent of the street-level, street-facing facade in accordance with the standards provided in subsection 23.47A.008.C.

a. Arts facilities;

b. Community gardens;

c. Eating and drinking establishments;

d. Entertainment uses, except for adult cabarets, adult motion picture theaters, and adult panorams;

e. Food processing and craft work;

f. Institutions, except hospitals or major institutions;

g. Lodging uses;

h. Medical services;

i. Offices, provided that no more than 30 feet of the street-level, street-facing facade of a structure may contain an office use;

j. Parks and open spaces;

k. Rail transit facilities;

l. Retail sales and services, automotive, in the Pike/Pine Conservation Overlay District if located within an existing structure or within a structure that retains a character structure as provided in Section 23.73.015;

m. Sales and services, general, provided that no more than 40 feet of the street-level, street-facing facade of a structure on a principal pedestrian street may contain a customer services office;

n. Sales and services, heavy, except for heavy commercial sales, and provided that no more than 30 feet of the street-level, street-facing facade of a structure may contain a non-household sales and service use; and

o. Low-income housing.

The establishment of any such use is subject to the applicable use provisions of this Title 23.

2. The following streets are principal pedestrian streets when located within a pedestrian-designated zone:

10th Avenue;

11th Avenue;

12th Avenue;

13th Avenue, between East Madison Street and East Pine Street;

14th Avenue South, except within the North Beacon Hill ((~~Residential~~)) Urban ((~~Village~~)) Center;

15th Avenue East;

15th Avenue Northeast, north of Lake City Way Northeast;

15th Avenue Northwest;

15th Avenue South;

17th Avenue Northwest;

20th Avenue Northwest;

22nd Avenue Northwest;

23rd Avenue;

24th Avenue Northwest;

25th Avenue Northeast;

32nd Avenue West;

35th Avenue Northeast, except within the Lake City ((~~Hub~~)) Urban ((~~Village~~)) Center;

35th Avenue Southwest, except within the West Seattle Junction ((~~Hub~~)) Urban ((~~Village~~)) Center;

39th Avenue Northeast;

Aurora ((~~Ave~~)) Avenue North, except within the Bitter Lake ((~~Village Hub Urban Village~~)) Urban Center;

Ballard Avenue Northwest;

Beacon Avenue South;

Boren Avenue;

Boylston Avenue, except within the Pike/Pine Conservation Overlay District;

Broadway;

Broadway East;

California Avenue Southwest;

Delridge Way Southwest;

Dexter Avenue North;

East Green Lake Drive North;

East Green Lake Way North;

East Madison Street;

East Olive Way;

East Pike Street;

East Pine Street;

East Union Street, except within the Pike/Pine Conservation Overlay District only lots abutting East Union Street between Broadway and East Madison Street;

Eastlake Avenue East;

First Avenue North, except within the Upper Queen Anne ((~~Residential~~)) Urban ((~~Village~~)) Center;

Fremont Avenue North;

Fremont Place North;

Galer Street;

Green Lake Drive North;

Greenwood Avenue North;

Lake City Way Northeast;

Leary Avenue Northwest;

Linden Avenue North;

Madison Street;

Martin Luther King Jr. Way South;

Mary Avenue Northwest, between Holman Road Northwest and Northwest 87th Street;

Mercer Street;

North 34th Street;

North 35th Street;

North 45th Street;

North 85th Street;

Northeast 43rd Street;

Northeast 45th Street, except between Linden Ave North and Evanston Ave North;

Northeast 55th Street, east of 15th Avenue Northeast;

Northeast 65th Street;

Northeast 125th Street;

Northwest 65th Street;

Northwest 85th Street;

Northwest 90th Street, between Mary Avenue Northwest and 14th Avenue Northwest;

Northwest Market Street;

Phinney Avenue North, between North 58th Street and North 63rd Street;

Pike Street;

Pine Street;

Queen Anne Avenue North;

Rainier Avenue South;

Roosevelt Way Northeast;

Roy Street;

Sand Point Way Northeast;

South Alaska Street;

South Cloverdale Street;

South Henderson Street;

South Jackson Street;

South Lander Street;

South McClellan Street;

South Othello Street;

Southwest Alaska Street;

Stone Way North;

Summit Avenue, except within the Pike/Pine Conservation Overlay District;

Terry Avenue;

University Way Northeast;

Wallingford Avenue North;

West Dravus Street;

West Galer Street;

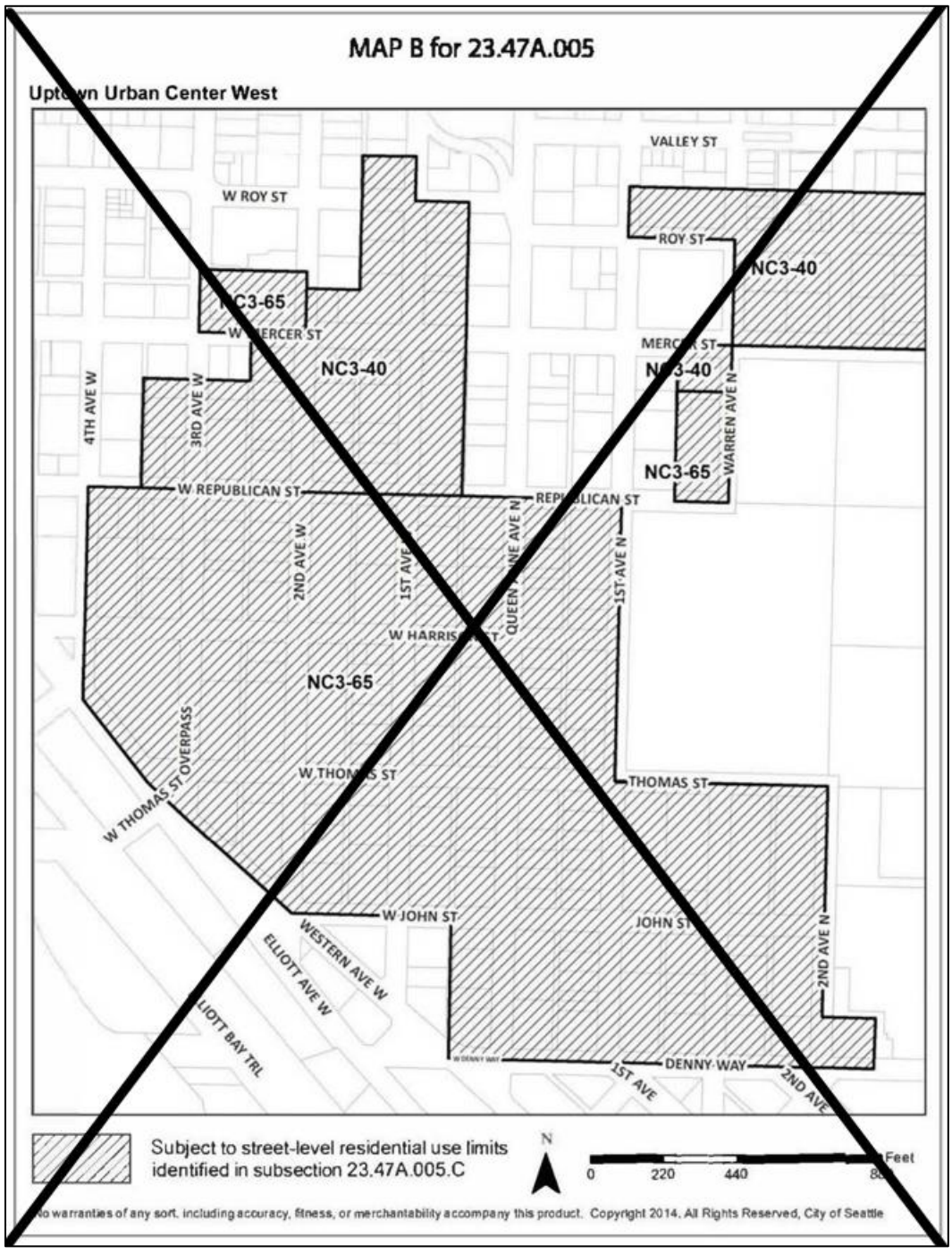
West Green Lake Drive North;

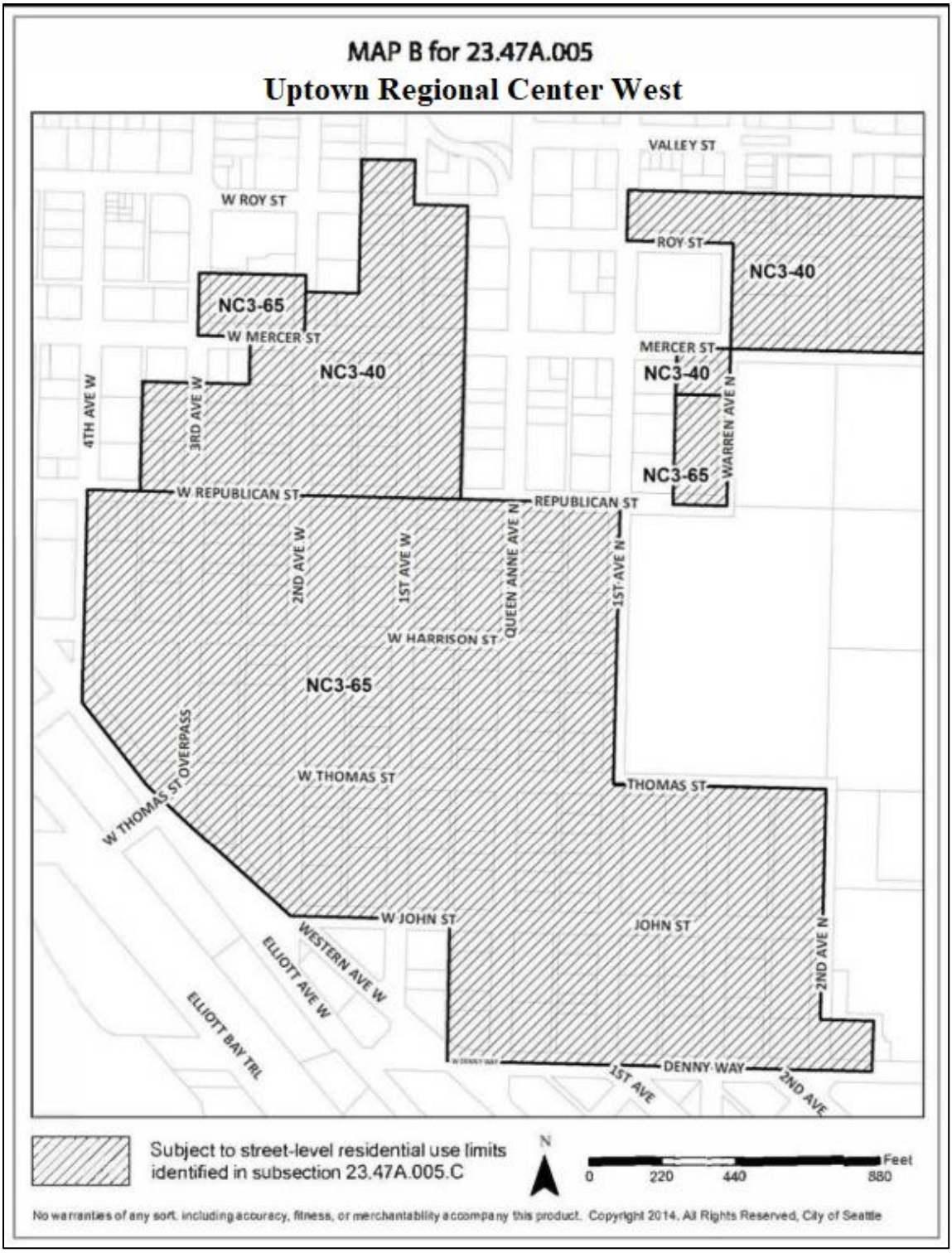
West McGraw Street, except within the Upper Queen Anne ((~~Residential~~)) Urban ((~~Village~~)) Center; and

Woodlawn Avenue Northeast.

Section 43. Map B and Map C for Section 23.47A.005 of the Seattle Municipal Code, which section was enacted by Ordinance 125125, are amended as follows:

Map B for 23.47A.005: Uptown ((~~Urban~~)) <u>Regional</u> Center West




MAP B for 23.47A.005
Uptown Regional Center West
VALLEY ST
W ROY ST
ROY ST
NC3-40
NC3-65
W MERCER ST
MERCER ST
NC3-40
NC3-40
4TH AVE W
3RD AVE W
WARREN AVE N
NC3-65
W REPUBLICAN ST
REPUBLICAN ST
2ND AVE W
1ST AVE W
QUEEN ANNE AVE N
1ST AVE N
W HARRISON ST
NC3-65
W THOMAS ST OVERPASS
W THOMAS ST
THOMAS ST
W JOHN ST
JOHN ST
WESTERN AVE W
ELLIOTT AVE W
ELLIOTT BAY TRL
2ND AVE N
DENNY WAY
1ST AVE
2ND AVE
Subject to street-level residential use limits identified in subsection 23.47A.005.C
N
0
220
440
880
Feet
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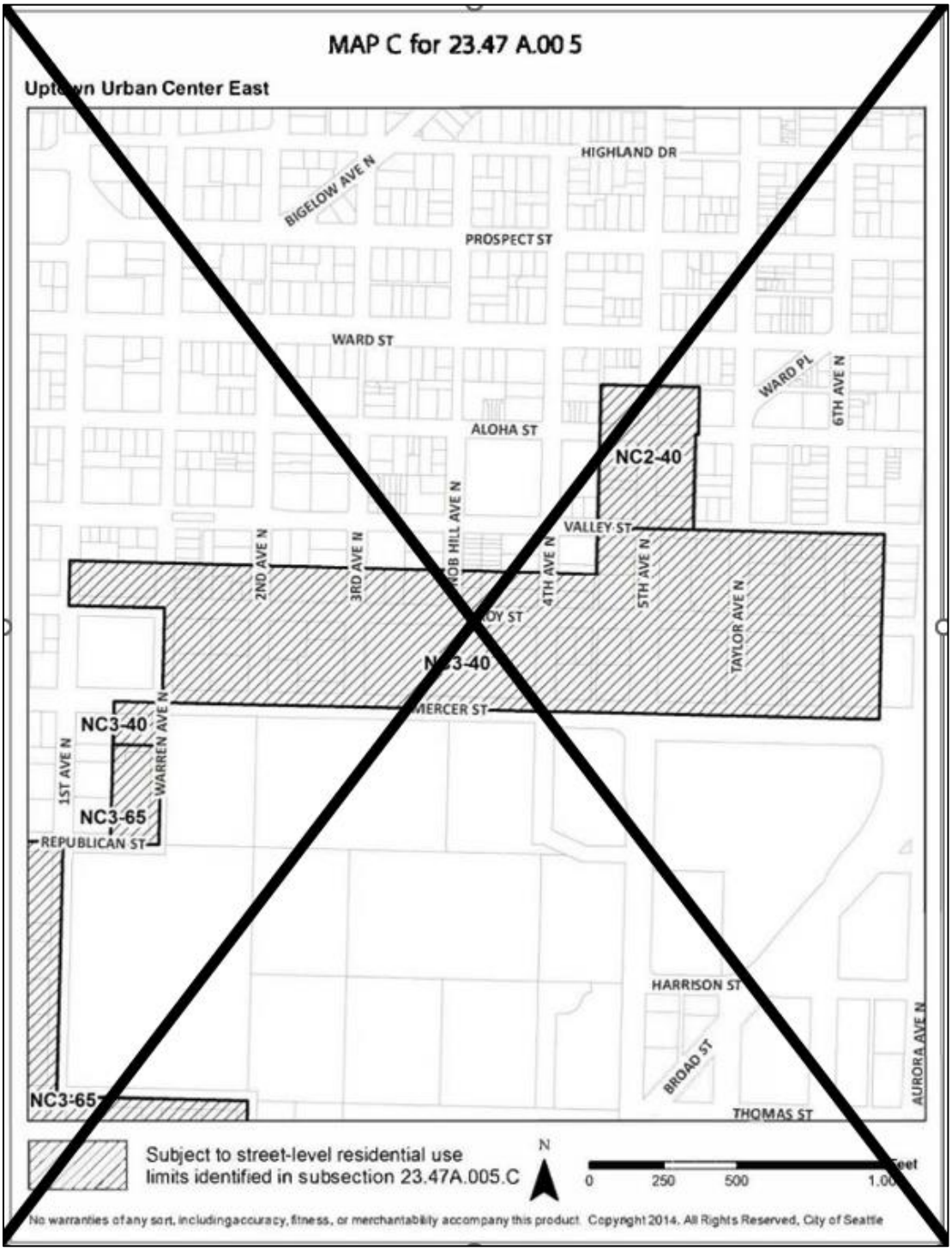
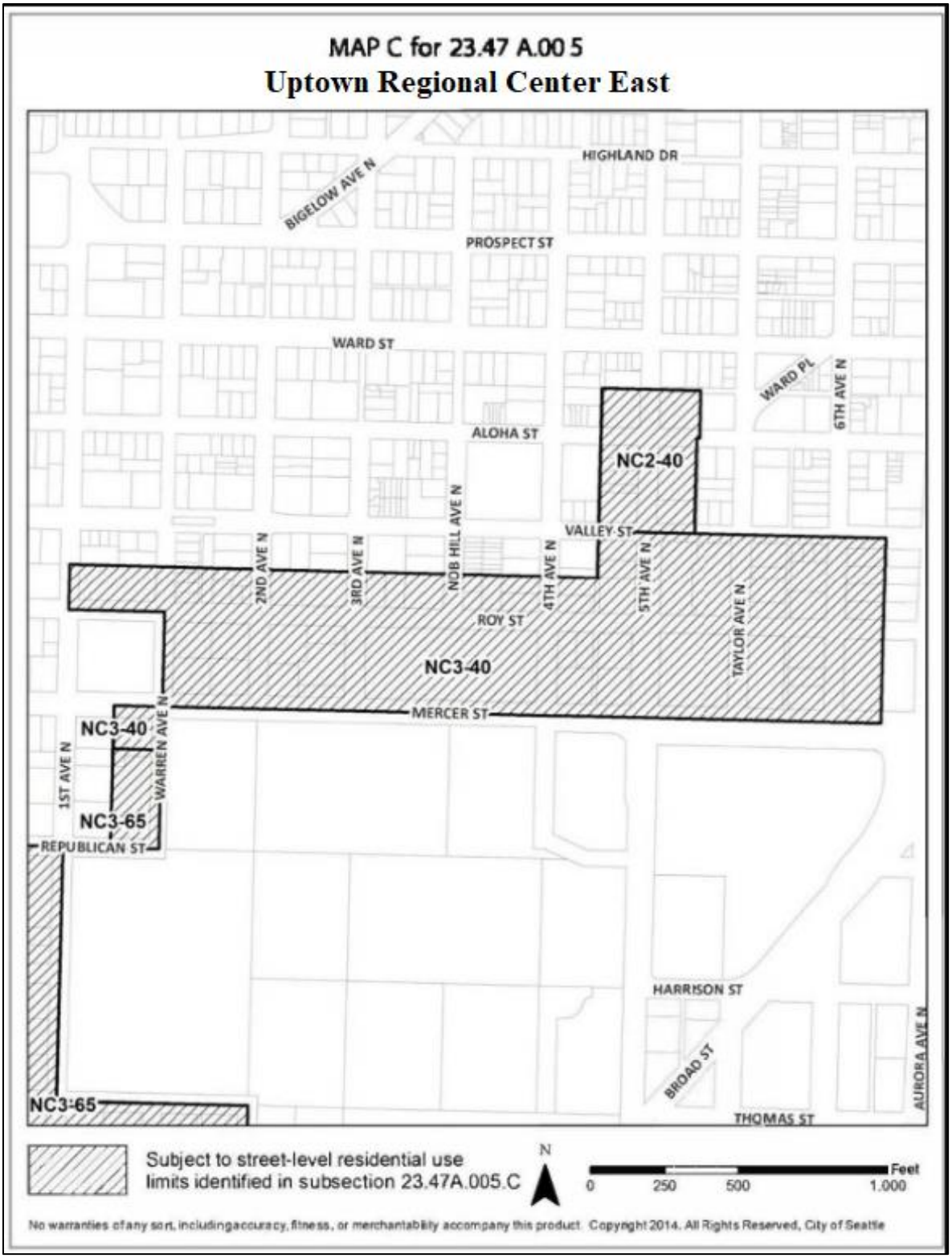
1

Map C for 23.47A.005: Uptown ((~~Urban~~)) Regional Center East




MAP C for 23.47 A.005
Uptown Regional Center East
HIGHLAND DR
BIGELOW AVE N
PROSPECT ST
WARD ST
WARD PL
6TH AVE N
ALOHA ST
NC2-40
NOB HILL AVE N
VALLEY ST
2ND AVE N
3RD AVE N
4TH AVE N
5TH AVE N
ROY ST
TAYLOR AVE N
NC3-40
MERCER ST
NC3-40
WARREN AVE N
1ST AVE N
NC3-65
REPUBLICAN ST
HARRISON ST
BROAD ST
AURORA AVE N
NC3-65
THOMAS ST
Subject to street-level residential use limits identified in subsection 23.47A.005.C
N
0
250
500
1,000
Feet
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* * *

Section 44. Section 23.47A.008 of the Seattle Municipal Code, last amended by Ordinance 126157, is amended as follows:

23.47A.008 Street-level development standards

* * *

C. In addition to the provisions of subsections 23.47A.008.A and 23.47A.008.B, the following standards also apply in pedestrian designated zones:

* * *

6. Space for small commercial uses at street level

a. Except as provided in subsection 23.47A.008.C.6.c, all structures abutting a principal pedestrian street that include more than 5,000 square feet of street-level commercial uses shall include small commercial spaces meeting the requirements of subsection 23.47A.008.C.6.b in the quantity required by Table A for 23.47A.008.C.

Table A for 23.47A.008.C
Number of small commercial spaces required

Total amount of square feet (sf) in street-level commercial use	**Number of small commercial spaces required**
Up to 5,000 sf	0
More than 5,000 sf up to 8,000 sf	1
More than 8,000 sf up to 12,000 sf	2
More than 12,000 sf up to 16,000 sf	3
More than 16,000 sf	4, plus 1 additional space for each additional 4,000 square feet above 16,000 square feet, up to a maximum of 8

b. Requirements for small commercial spaces. The required small commercial spaces must:

1) Contain only commercial uses;

2) Be a minimum of 300 square feet and a maximum of 1,500 square feet;

3) Have an entrance for pedestrians from the street or from a street-oriented courtyard that is no more than 3 feet above or below the sidewalk grade; and

4) Be separated from other commercial spaces by a physical divider such as a wall or partition.

c. Exception. The requirements of this subsection 23.47A.008.C.6 do not apply to structures with more than 50 percent of the total street-level gross floor area occupied by any of the following uses:

1) Arts facilities;

2) Child care centers;

3) Colleges;

4) Community clubs or community centers;

5) Libraries;

6) Institutes for advanced study;

7) Museums;

8) Performing arts ((~~theatres~~)) theaters;

9) Grocery stores less than 15,000 square feet;

10) Elementary or secondary schools;

11) Religious facilities;

12) Vocational or fine arts schools; or

13) Shopping atriums, where multiple businesses operate within a contiguous space.

d. As a Type I decision, the Director may waive the requirements of subsection 23.47A.008.C.6. The Director's decision shall be based on the availability of existing small commercial spaces on a principal pedestrian street:

1) Within the same urban ((~~village~~)) center as the structure;

2) Within 400 lineal feet of the structure, if the structure is located within ((~~an urban~~)) a regional center; or

3) Within the same pedestrian-designated zone as the structure on the same principal pedestrian street, if the structure is located outside of ((~~an urban village or urban center~~)) a regional center or an urban center.

* * *

Section 45. Section 23.47A.009 of the Seattle Municipal Code, last amended by Ordinance 126862, is amended as follows:

23.47A.009 Standards applicable to specific areas

* * *

B. West Seattle Junction ((~~Hub~~)) Urban ((~~Village~~)) Center. The following provisions apply to development in the NC3-95 zone located between SW Alaska Street, SW Edmunds Street, Fauntleroy Way SW, and 40th ((~~Ave~~)) Avenue SW:

1. Lot coverage limit. The maximum lot coverage permitted for principal and accessory structures shall not exceed 80 percent on lots 40,000 square feet in size or greater.

2. The total permitted FAR is as identified in Section 23.47A.013.

3. Maximum width of structures. The maximum width of all portions of a structure measured parallel to a north-south street lot line is 275 feet.

4. Setback and separation requirements

a. The following standards apply to structures greater than 250 feet in width measured parallel to a north-south street lot line:

1) A minimum separation of 30 feet is required between structures that are adjacent to the same north-south street lot line; and

2) A minimum setback of 15 feet is required from side lot lines that are not street side lot lines and that separate lots that abut the same north-south street lot line; and

3) Structures permitted in required setback and separation areas pursuant to this subsection 23.47A.009.B.4.a and subsection 23.47A.009.B.4.b are subject to subsection 23.47A.014.G. In addition:

a) Decks with open railings may project up to 5 feet into the required setback or separation area if they are no lower than 20 feet above existing or finished grade. Decks may cover no more than 20 percent of the total setback or separation area.

b) Unenclosed porches or steps for residential units no higher than 4 feet above the grade at the street lot line closest to the porch are permitted.

b. A setback of at least 10 feet from the street lot line is required along non-arterial north-south avenues for at least 25 percent of the lot frontage or 100 feet of the lot frontage, whichever is less.

c. Required setback and areas separating structures identified in subsections 23.47A.009.B.4.a and 23.47A.009.B.4.b shall include landscaping, paving, and lighting. Sidewalks for pedestrian access, plazas, or other approved amenity or landscaped areas are permitted in required setback or separation areas.

d. Upper-level setback requirements along SW Alaska Street

1) Structures exceeding 65 feet in height on lots abutting SW Alaska Street between 38th Avenue SW and California Avenue SW shall maintain a minimum setback of 10 feet for that portion of the structure between 45 feet and 55 feet in height.

2) For portions of a structure above 55 feet in height, an additional minimum setback is required at a rate of at least 1 foot of setback for every 5 feet of height that exceeds 55 feet, up to the maximum allowable height.

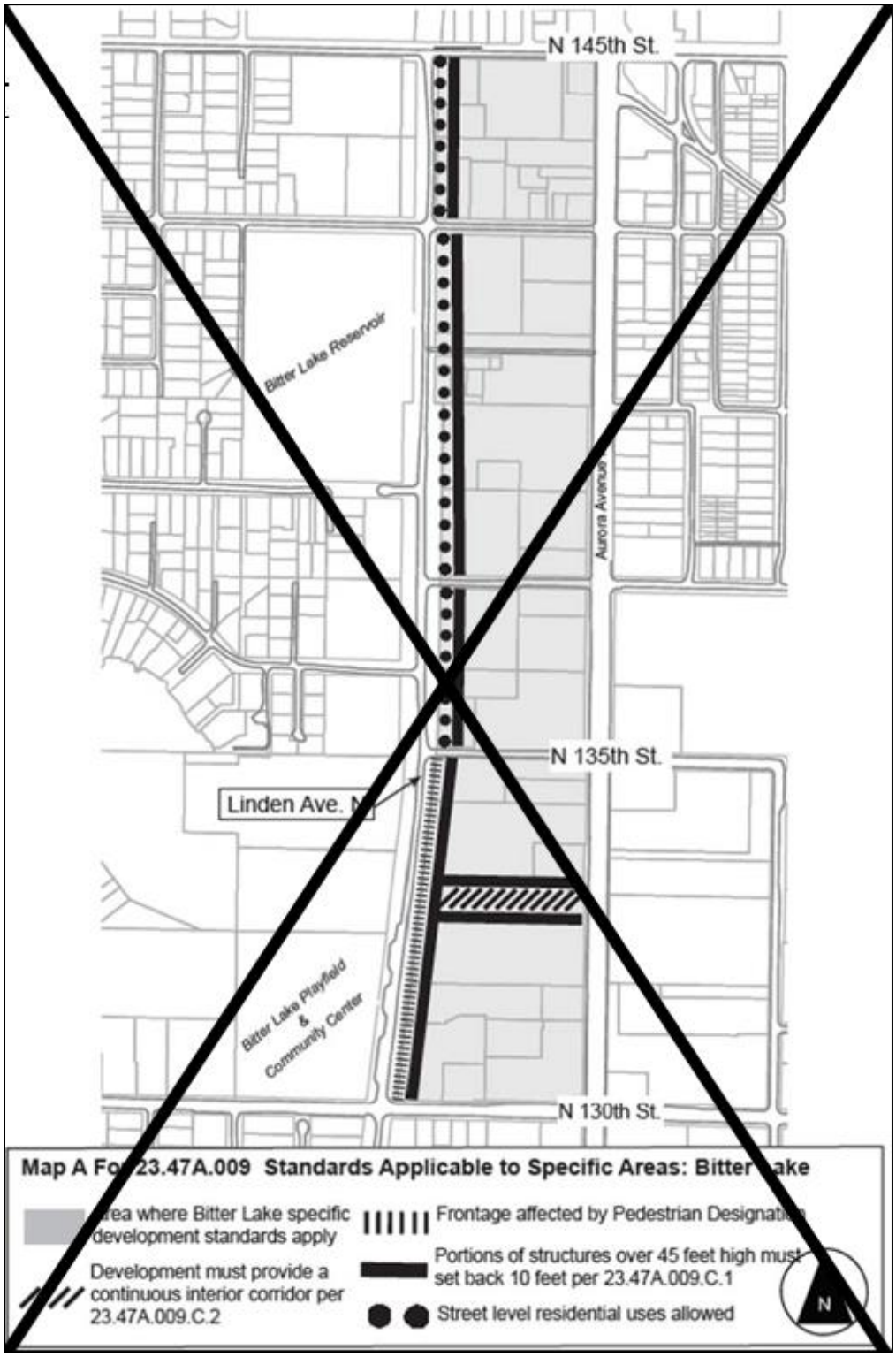
3) Structures located within 100 feet of Fauntleroy Way SW are exempt from the upper-level setback requirement.

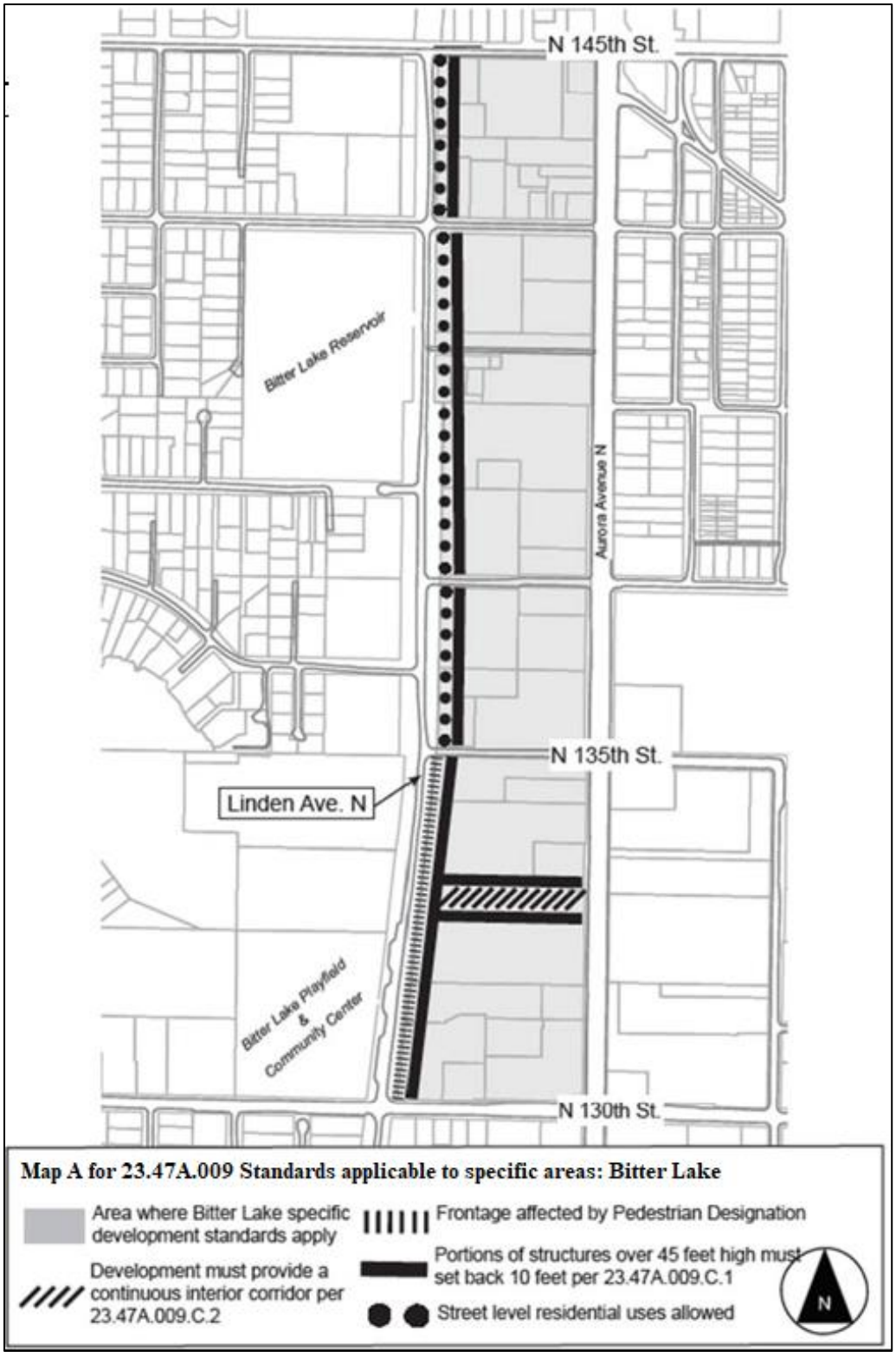
4) Heights in this subsection 23.47A.009.B.4.d shall be measured from the middle of the street lot line along SW Alaska Street.

C. Bitter Lake ((~~Village Hub Urban Village~~)) Urban Center. Development on lots designated on Map A for 23.47A.009 shall meet the following requirements:

Map A for 23.47A.009

Standards ((~~Applicable~~)) applicable to ((~~Specific Areas~~)) specific areas: Bitter Lake




N 145th St.
Bitter Lake Reservoir
Aurora Avenue N
N 135th St.
Linden Ave. N
Bitter Lake Playfield & Community Center
N 130th St.
Map A for 23.47A.009 Standards applicable to specific areas: Bitter Lake
Area where Bitter Lake specific development standards apply
Development must provide a continuous interior corridor per 23.47A.009.C.2
Frontage affected by Pedestrian Designation
Portions of structures over 45 feet high must set back 10 feet per 23.47A.009.C.1
Street level residential uses allowed
N

1

1. Upper-level setback requirement. The following standards apply to development on lots abutting the east side of Linden ((~~Ave~~)) Avenue North or along both sides of the corridor required in subsection 23.47A.009.C.2.

a. Any portion of a structure greater than 45 feet in height, measured from the finished grade along the street property line that abuts Linden Avenue North or along the access corridor required in subsection 23.47A.009.C.2, measured from the finished grade along the edge of the access corridor, shall set back an average of 10 feet from the lot line abutting Linden Avenue North or from the edge of the access corridor as measured according to Section 23.86.012. The maximum depth of a setback that can be used for calculating the average setback is 20 feet.

b. Structures permitted in required setbacks are subject to subsection 23.47A.014.G.

2. Corridor requirement. An access corridor shall be provided on lots over 8 acres that abut Linden Avenue North and Aurora Avenue North, to connect Linden Avenue North and Aurora Avenue North. The location of the proposed corridor shall be clearly shown on the site plan that is submitted with the permit application.

a. The corridor shall have a minimum width of 40 feet and a maximum width of 60 feet.

b. The point at which the corridor intersects Linden Avenue North and Aurora Avenue North shall be at least 335 feet south of the south boundary of the North 135th Street right-of-way, and 700 feet north of the north boundary of the North 130th Street right-of-way, as illustrated by example in Map A for 23.47A.009.

c. The corridor shall include a minimum of one walkway, at least 6 feet wide, extending between Linden Avenue North and Aurora Avenue North. If vehicle access is provided within the corridor, the corridor shall include walkways at least 6 feet wide along both sides of the vehicle access.

d. Landscaping shall be provided along the corridor. If vehicle access is provided within the corridor, trees shall be provided between the walkways and vehicle travel lanes. The Director will determine the number, type, and placement of trees to be provided in order to:

1) Match trees to the available space;

2) Complement existing or planned street trees on abutting streets; and

3) Encourage healthy growth through appropriate spacing.

e. Pedestrian-scaled lighting shall be provided along the corridor.

f. The corridor shall not include any features or structures except the following:

1) Vehicle access, not more than one lane in each direction and meeting the standards of Section 23.54.030.

2) Parking meeting the standards of Section 23.54.030 is allowed along vehicle access lanes within the corridor. Such parking is in addition to the maximum number of spaces allowed under subsection 23.54.015.C.2. The requirements of subsection 23.47A.032.A do not apply to access to parking from the corridor.

3) Overhead horizontal building projections of an architectural or decorative character such as cornices, eaves, sills, and gutter, provided that they project no more than 18 inches from the structure facade.

4) Ramps or other devices that provide access for the disabled and elderly and that meet the standards of the Seattle Building Code are permitted.

5) Stairs or ramps to accommodate changes in grade.

6) Underground structures.

7) Unenclosed porches or steps for residential units no higher than 4 feet above the finished grade of the corridor are permitted to project no more than 4 feet into the corridor.

8) Green stormwater infrastructure.

9) Features required elsewhere in this subsection 23.47A.009.C.2.

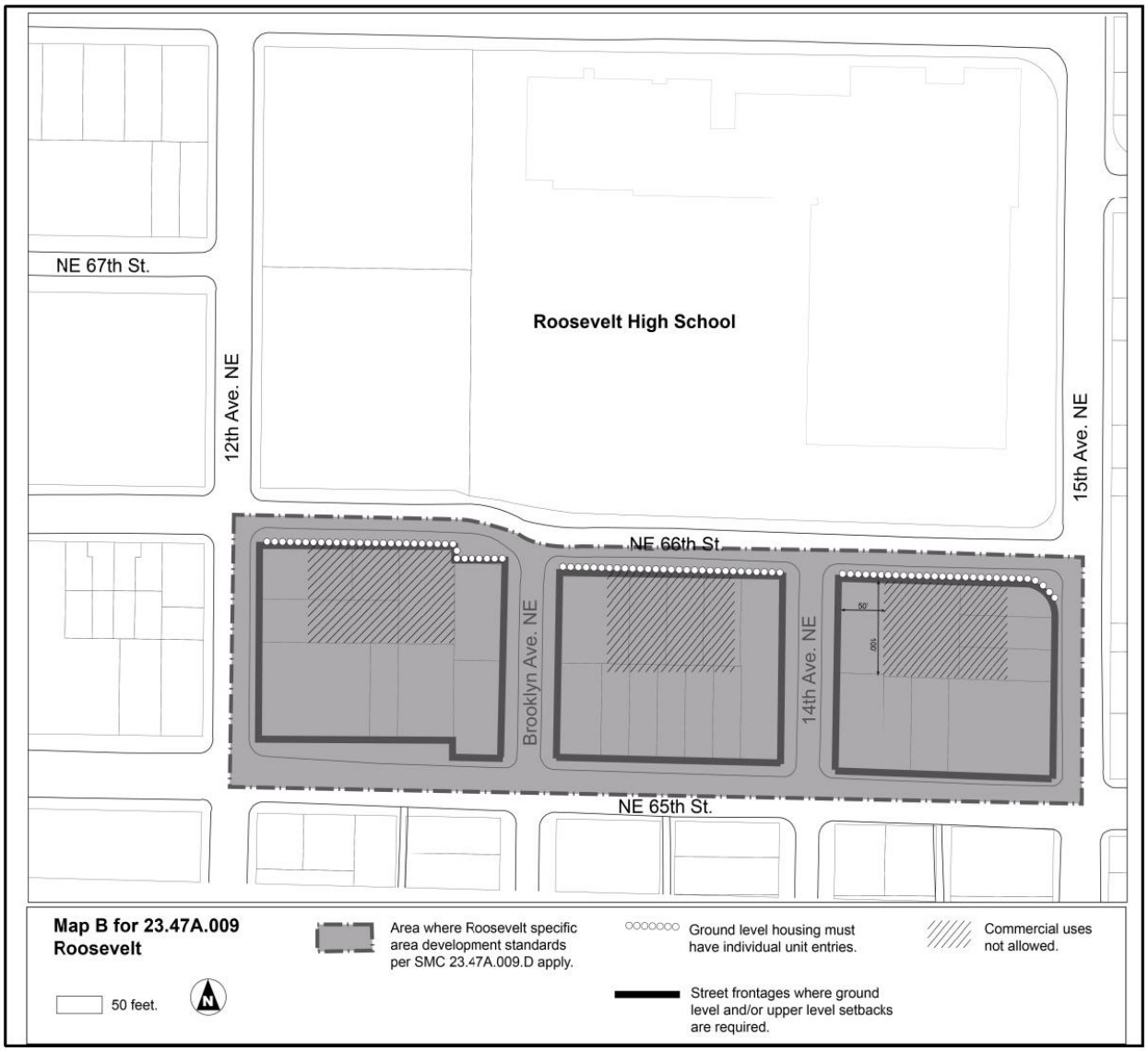
10) The Director may approve other features or structures, such as overhead weather protection, signage, and art, that do not impede safe access from the site to Linden Avenue North and Aurora Avenue North, and that enhance pedestrian comfort and safety of the corridor.

g. If the area proposed for development on a site meeting the size threshold for this subsection 23.47A.009.C.2 is less than the full lot, the Director may waive or modify the access corridor requirement, if the applicant submits a site plan demonstrating how Linden Avenue North and Aurora Avenue North will be connected by an access corridor when the remainder of the lot is developed.

D. Roosevelt Urban ((~~Village~~)) Center. The following provisions apply within the area shown on Map B for 23.47A.009.

Map B for 23.47A.009

Roosevelt



1. Setback requirements

a. The following setbacks are required from the listed street property lines:

1) Northeast 66th Street. An average ground-level setback of 10 feet along the length of the street property line and a minimum upper-level setback of 4 feet. The minimum upper-level setback shall be provided in addition to the required ground-level setback

at all points along the length of the street property line at 45 feet of height and above, as measured from average finished grade.

2) Brooklyn Avenue Northeast. An average ground-level setback of 5 feet along the length of the street property line and a minimum upper-level setback of 4 feet. The minimum upper-level setback shall be provided in addition to the required ground-level setback at all points along the length of the street property line at 45 feet of height and above, as measured from average finished grade.

3) 14th Avenue Northeast. An average ground-level setback of 15 feet and a minimum ground-level setback of 5 feet along the length of the street property line and a minimum upper-level setback of 3 feet. The minimum upper-level setback shall be provided in addition to the required ground-level setback at all points along the length of the street property line at 45 feet of height and above, as measured from average finished grade.

4) 15th Avenue Northeast. A minimum ground-level setback of 5 feet along the length of the street property line and an average upper-level setback of 7 feet. The average upper-level setback shall be provided in addition to the required ground-level setback at all points along the length of the street property line at 45 feet of height and above, as measured from average finished grade.

5) Northeast 65th Street and 12th Avenue Northeast. An average ground-level setback of 8 feet shall be provided, and the setback may include pedestrian access and circulation.

b. Structures permitted in required setbacks are subject to subsection 23.47A.014.G, except that:

1) Decks with open railings may project up to 5 feet into the required setback area if they are no lower than 20 feet above existing or finished grade. Decks may cover no more than 20 percent of the total setback area.

2) Stoops or porches providing direct access to individual housing units may project up to 5 feet into the required ground-level setback area, except that portions of stoops or porches not more than 2.5 feet in height from existing or finished grade, whichever is lower, may extend to a street lot line. The 2.5-foot height limit for stoops or porches does not apply to guard rails or hand rails. Such stoops or porches shall cover no more than 20 percent of the total ground-level setback area.

3) Fences no greater than 4 feet in height are permitted in the required ground-level setback, and up to 2 feet of additional height for architectural features such as arbors or trellises on the top of a fence is permitted. Fence height may be averaged along sloping grades for each 4 foot long segment of the fence, but in no case may any portion of the fence exceed 6 feet in height.

c. Where required setbacks may be averaged, measurement shall be pursuant to subsection 23.86.012.A and the following:

1) Where a building is set back more than 30 feet from a lot line at ground level, 30 feet shall be used as the ground-level setback amount for averaging purposes.

2) Where averaging is allowed for a required upper-level setback, the measurement shall be taken horizontally from points directly above the lot line to the facade of the structure at the height where the upper-level setback is required.

2. Landscaping. Required ground-level setbacks shall be landscaped, and may include paving and lighting to enhance pedestrian safety and comfort. Sidewalks, plazas, and

other amenities or landscaped areas approved by the Director are permitted in required ground-level setbacks.

3. Limit on commercial uses. Commercial uses are prohibited within 80 feet of the street property line of Northeast 66th Street, except within 50 feet of the intersections of Northeast 66th Street with Brooklyn Avenue Northeast, 14th Avenue Northeast, 12th Avenue Northeast, and 15th Avenue Northeast, as shown on Map B for 23.47A.009.

4. Housing units on the ground floor. All housing units with a facade that faces Northeast 66th Street with no intervening housing units or commercial uses between the housing unit and the Northeast 66th Street lot line, and located on the first floor of a building, shall have the primary pedestrian entrance to each housing unit directly accessible from the exterior of the structure rather than a primary pedestrian entry through a common entrance hallway.

5. Underground parking. Parking shall be located below grade, except a portion of a below-grade garage may extend up to 4 feet above existing or finished grade, whichever is lower, provided that the parking that extends above grade is fully screened from direct street view by the street-facing facade of the structure or by landscaping.

* * *

F. Ballard ((~~Hub Urban Village~~)) Regional Center. The following provisions apply to development proposed in NC zones within the Ballard ((~~Hub Urban Village~~)) Regional Center.

1. Maximum lot coverage on lots 40,000 square feet in size or greater:

a. The maximum lot coverage permitted for principal and accessory structures is 80 percent of the lot area.

b. Lot coverage exceptions. The following structures or portions of structures are not counted in the lot coverage calculation:

1) Portions of a structure that are below grade or that do not extend more than 4 feet above the existing or finished grade, whichever is lower.

2) The first 18 inches of overhead horizontal building projections of an architectural or decorative character, such as cornices, eaves, sills, and gutters.

3) Ramps or other devices that provide access for the disabled and elderly and that meet the standards of the Seattle Existing Building Code.

4) The first 4 feet of unenclosed porches or steps for residential units.

c. In the 20 percent of the lot that remains uncovered, as required by this subsection 23.47A.009.F.1, not more than ten parking spaces may be provided, and applicants are encouraged to provide elements at grade that enhance the usability and livability of the lot for residents and tenants such as pedestrian circulation areas, landscaping, lighting, weather protection, art, or other similar features.

2. Facade modulation

a. Facade modulation requirements apply to all portions of a street-facing facade of a structure up to a height of 45 feet located within 10 feet of a street lot line, according to provisions of subsection 23.47A.009.F.2.c.

b. The maximum width of any unmodulated street-facing facade is 100 feet. Facades longer than 100 feet shall be modulated at no greater than 100-foot intervals by stepping back the facade from the street lot line for a minimum depth of 10 feet and a minimum width of 15 feet.

c. Facade modulation requirements do not apply to portions of a structure that are below grade or that do not extend more than 2 feet above the existing or finished grade at the street lot line, whichever is lower.

3. Maximum structure width

a. The maximum allowed structure width is 250 feet.

b. Structure width limits do not apply to portions of a structure that are below grade or that do not extend more than 2 feet above the existing or finished grade at the street lot line, whichever is lower.

4. Setback requirements

a. Street-level setbacks

1) In the area shown on Map D for 23.47A.009, portions of a structure up to 10 feet above the abutting sidewalk grade facing 15th Avenue NW shall be set back from the street lot line by a minimum depth of 6 feet up to a maximum depth of 10 feet.

2) The provisions of subsection 23.47A.009.F.2 do not apply to the area described in subsection 23.47A.009.F.4.a.1.

b. Upper-level setbacks

1) A setback with an average depth of 10 feet from all abutting street lot lines is required for portions of a structure above a height of 45 feet. The maximum depth of a setback that can be used for calculating the average setback is 20 feet.

2) A setback with an average depth of 15 feet from all street lot lines is required for portions of a structure above a height of 65 feet. The maximum depth of a setback that can be used for calculating the average setback is 25 feet.

5. Structures permitted in required setback and separation areas according to this subsection 23.47A.009.F are subject to subsection 23.47A.014.G.

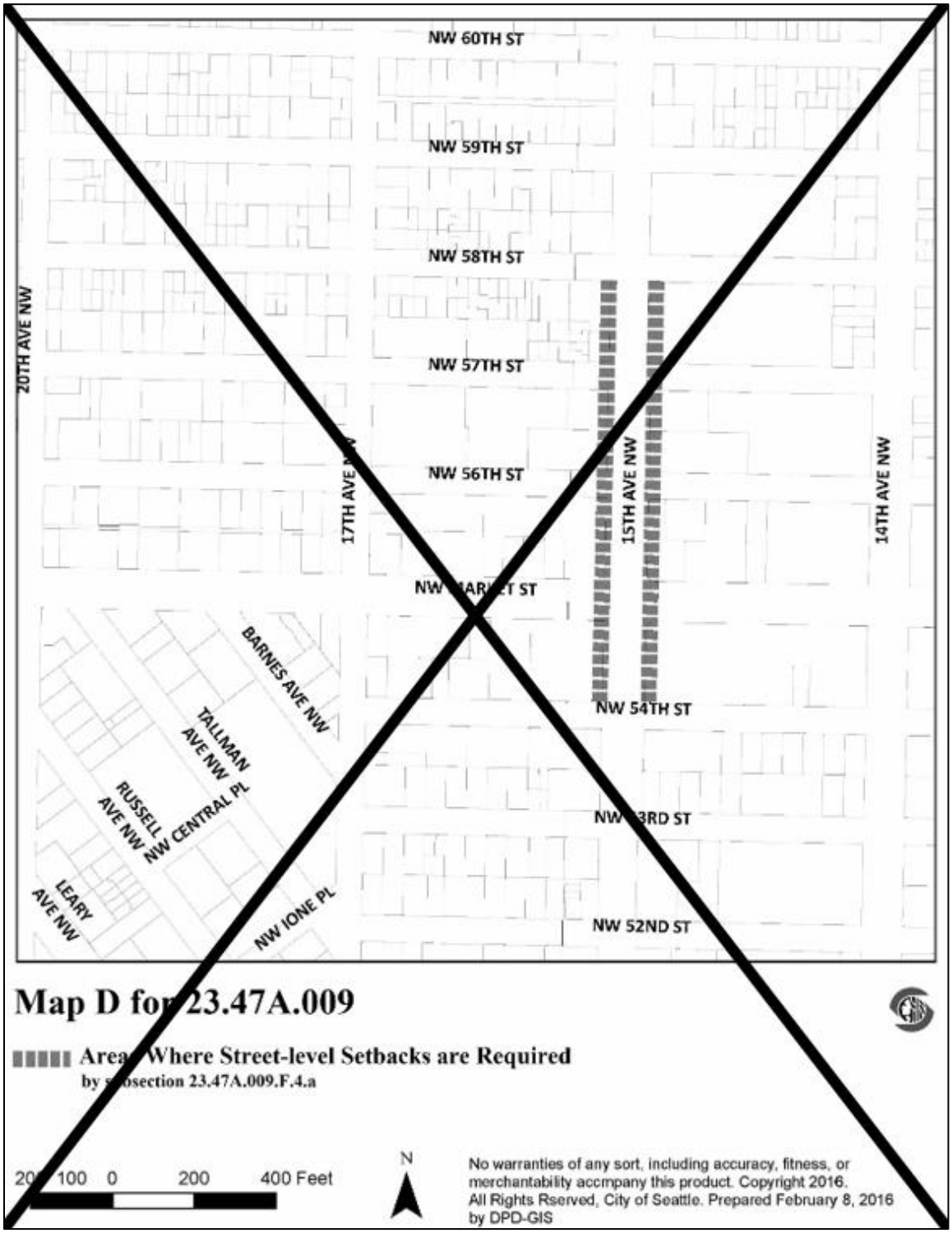
6. In the area shown on Map E for ((~~Section~~)) 23.47A.009:

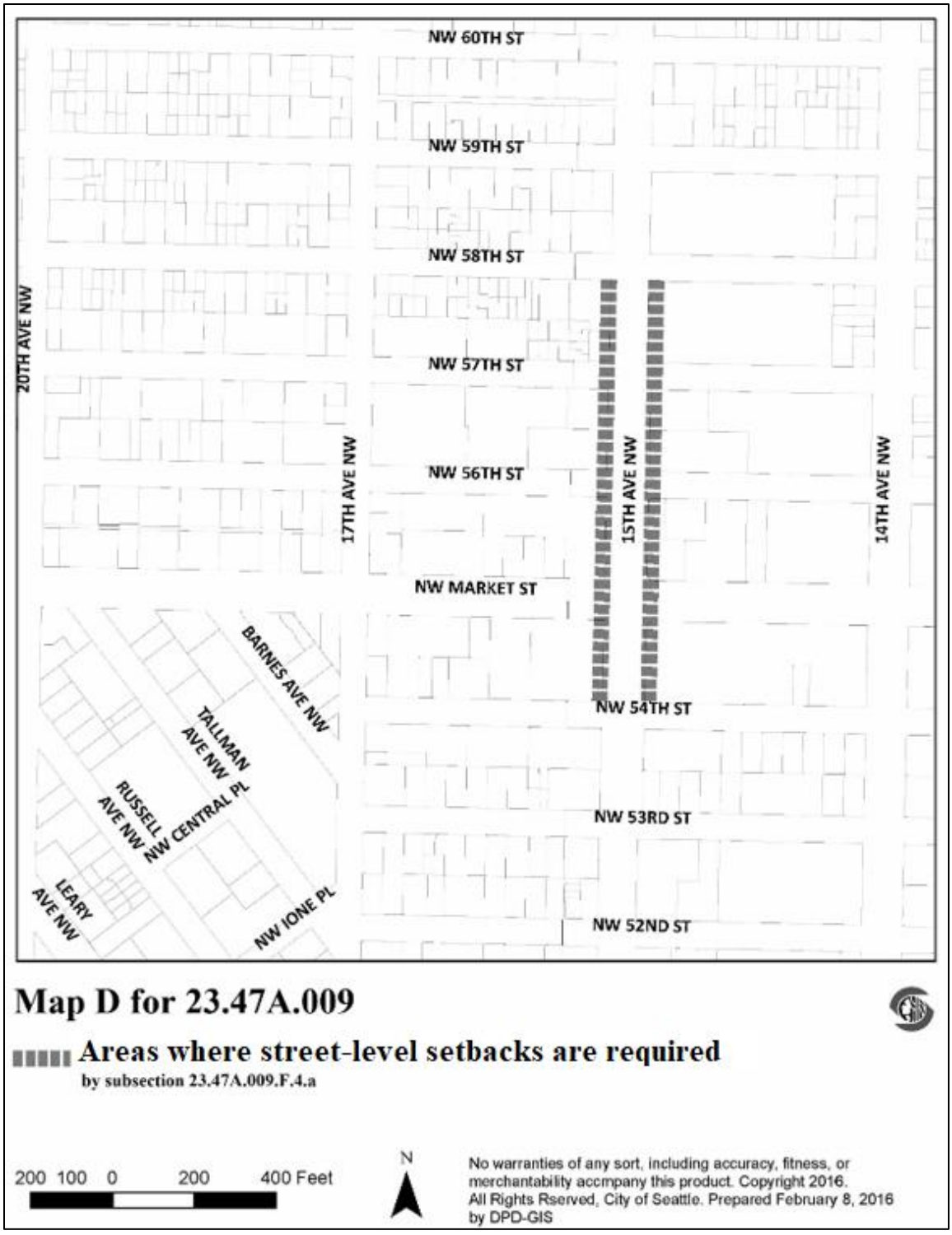
a. All dwelling units shall have sound-insulating windows sufficient to maintain interior sound levels at 60 decibels or below in consideration of existing environmental noise levels at the site. The applicant shall submit an analysis of existing noise levels and documentation of the sound insulating capabilities of windows shall be indicated on the plan.

b. All dwelling units shall have a permanently installed air cooling system and a balanced ventilation system, which may be combined. The ventilation system shall filter any outdoor air supply through filters rated MERV 13 or higher as determined by the American Society of Heating, Refrigerating, and Air Conditioning Engineers (ASHRAE). The air cooling and ventilation systems shall be indicated on the plan.

Map D for 23.47A.009

Areas ((~~Where Street-level Setbacks~~)) <u>where street-level setbacks</u> are ((~~Required~~)) <u>required</u>




NW 60TH ST
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15TH AVE NW
14TH AVE NW
BARNES AVE NW
TALLMAN AVE NW PL
RUSSELL AVE NW
NW CENTRAL PL
LEARY AVE NW
NW IONE PL
Map D for 23.47A.009
Areas where street-level setbacks are required
by subsection 23.47A.009.F.4.a
200 100 0 200 400 Feet
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No warranties of any sort, including accuracy, fitness, or merchantability accmpany this product. Copyright 2016. All Rights Rserved, City of Seattle. Prepared February 8, 2016 by DPD-GIS

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Map E for 23.47A.009

Areas where noise-attenuating windows and air cooling and ventilation are required

G. University ((~~Community Urban~~)) District Regional Center. The following provisions apply to specified NC zones within the portion of the University ((~~Community Urban~~)) District Regional Center west of 15th Avenue NE.

1. Maximum width and depth limits. The following standards apply to NC zones with a mapped height limit exceeding 40 feet:

a. The maximum width and depth of a structure is 250 feet, except as otherwise provided in this subsection 23.47A.009.G.1. The width and depth limits do not apply to below-grade or partially below-grade stories with street-facing facades that do not extend more than 4 feet above the sidewalk, measured at any point above the sidewalk elevation to the floor above the partially below-grade story, excluding access.

b. For the stories of a structure subject to width and depth limits, all portions of the same story that are horizontally contiguous, including any portions connected by doorways, ramps, bridges, stairways, and other such features, shall be included in the measurement of width and depth. The width and depth limit of stories in separate structures or structures on the same lot that abut but are not internally connected shall be measured separately. Designated Landmark structures and vulnerable masonry structures included on a list promulgated by the Director that are retained on the lot are excluded from the width and depth measurement, whether or not internally or externally connected to a new structure.

c. Width and depth limits do not apply to stories of a structure with more than 50 percent of the total gross floor area occupied by any of the following uses:

1) Community clubs or community centers;

2) Religious facilities;

3) Arts facilities;

4) Child care centers or elementary or secondary schools; or

5) Performing arts theaters.

2. Provisions for the transfer of development rights (TDR) and transfer of development potential (TDP)

a. Lots located in NC3 and NC3P zones with height limits of 55 feet or greater are eligible as open space, vulnerable masonry structure, or Landmark TDR and TDP sending sites if the lot meets the definition of the applicable TDR or TDP sending site in Chapter 23.84A and meets all applicable standards in Section 23.58A.042.

b. The maximum amount of TDR and TDP that can be transferred from an eligible sending site shall not exceed an amount of floor area equivalent to the numerical value of the FAR permitted on a lot that is solely occupied by residential uses or ((~~non-residential~~)) nonresidential uses in the zone where the sending site is located, as shown on Table A for 23.47A.013, multiplied by the lot area of the sending site and minus the sum of any chargeable floor area on the lot plus any TDR and TDP previously transferred.

c. Eligible receiving sites are limited to those lots in SM-U zones specified in subsection 23.48.623.C.

* * *

Section 46. Section 23.47A.012 of the Seattle Municipal Code, last amended by Ordinance 127025, is amended as follows:

23.47A.012 Structure height

A. The height limit for structures in NC zones or C zones is as designated on the Official Land Use Map, Chapter 23.32. Structures may not exceed the applicable height limit, except as otherwise provided in this Section 23.47A.012.

1. In zones with a 30-foot or 40-foot mapped height limit:

a. The height of a structure may exceed the otherwise applicable limit by up to 4 feet, subject to subsection 23.47A.012.A.1.c, provided the following conditions are met:

1) Either: ((~~a) A~~)) a floor-to-floor height of 13 feet or more is provided for ((~~non-residential~~)) nonresidential uses at street level; or ((~~b) A~~)) a residential use is located on a street-level, street-facing facade, provided that the average height of the exterior facades of any portion of a story that is partially below-grade does not exceed 4 feet, measured from existing or finished grade, whichever is less, and the first floor of the structure at or above grade is at least 4 feet above sidewalk grade; and

2) The additional height allowed for the structure will not allow an additional story beyond the number that could be built under the otherwise applicable height limit.

b. The height of a structure may exceed the otherwise applicable limit by up to 7 feet, subject to subsection 23.47A.012.A.1.c, provided all of the following conditions are met:

1) Residential and multi-purpose retail sales uses are located in the same structure;

2) The total gross floor area of at least one multi-purpose retail sales use exceeds 12,000 square feet;

3) A floor-to-floor height of 16 feet or more is provided for the multi-purpose retail sales use at street level;

4) The additional height allowed for the structure will not allow an additional story beyond the number that could be built under the otherwise applicable height limit if a floor-to-floor height of 16 feet were not provided at street level; and

5) The structure is not allowed additional height under subsection 23.47A.012.A.1.a.

c. The Director shall reduce or deny the additional structure height allowed by this subsection 23.47A.012.A.1 if the additional height would significantly block views from neighboring residential structures of any of the following: Mount Rainier, the Olympic and Cascade Mountains, the downtown skyline, Green Lake, Puget Sound, Lake Washington, Lake Union, or the Ship Canal.

2. Within the Station Area Overlay District within the University ((~~Community Urban~~)) District Regional Center, maximum structure height may be increased to 125 feet when all of the following are met:

a. The lot is within two blocks of a planned or existing light rail station;

b. The proposed use of the lot is functionally related to other office development, permitted prior to 1971, to have over 500,000 square feet of gross floor area to be occupied by a single entity;

c. A transportation management plan for the life of the use includes incentives for light rail and other transit use by the employees of the office use;

d. The development shall provide street-level amenities for pedestrians and shall be designed to promote pedestrian interest, safety, and comfort through features such as landscaping, lighting, and transparent facades, as determined by the Director; and

e. This subsection 23.47A.012.A.2 can be used only once for each development that is functionally related.

3. On a lot containing a peat settlement-prone environmentally critical area, the height of a structure may exceed the otherwise applicable height limit and the other height allowances provided by this Section 23.47A.012 by up to 3 feet. In addition, 3 more feet of height may be allowed for any wall of a structure on a sloped lot, provided that on the uphill sides of the structure, the maximum elevation of the structure height shall be no greater than the height allowed by the first sentence of this subsection 23.47A.012.A.3. The Director may apply the allowances in this subsection 23.47A.012.A.3 only if the following conditions are met:

a. The Director finds that locating a story of parking underground is infeasible due to physical site conditions such as a high water table;

b. The Director finds that the additional height allowed for the structure is necessary to accommodate parking located partially below grade that extends no more than 6 feet above existing or finished grade, whichever is lower, and no more than 3 feet above the highest existing or finished grade along the structure footprint, whichever is lower, as measured to the finished floor level above; and

c. Other than the additional story of parking allowed according to this subsection 23.47A.012.A.3, the additional height shall not allow an additional story beyond the number of stories that could be built under the otherwise applicable height limit.

4. In zones that are located within the Pike/Pine Conservation Overlay District with a mapped height limit of 75 feet, the provisions of Section 23.73.014 apply.

5. In Commercial zones bounded by ((~~S.~~)) South Dawson ((~~St.~~)) Street to the north, 5th ((~~Ave. S.~~)) Avenue South to the east, ((~~S.~~)) South Fidalgo ((~~St.~~)) Street to the south,

and 3rd ((~~Ave. S.~~)) Avenue South to the west, the height of a structure may exceed the otherwise applicable limit by up to 10 feet, provided all of the following conditions are met:

a. The applicant makes a commitment that the proposed development will meet the green building standard and shall demonstrate compliance with that commitment in accordance with Chapter 23.58D;

b. The development includes at least five stories solely occupied by residential uses;

c. At least 20 percent of the street frontage at ((~~street-level~~)) street level of the development shall be street-level uses from the list in subsection 23.47A.005.D.1;

d. A floor-to-floor height of 20 feet or more is provided for the ((~~non-residential~~)) nonresidential uses at street level provided to comply with the provisions of subsection 23.47A.012.A.5.c; and

e. All dwelling units in the development have sound-insulating windows and air cooling and ventilation systems meeting the requirement of subsection 23.47A.009.J.4 and 23.47A.009.J.5.

* * *

F. Additional height in NC3-200 and NC3P-200 zoned areas in the First Hill/Capitol Hill ((~~Urban~~)) Regional Center((~~32~~))

In the NC3-200 and NC3P-200 zones in the First Hill/Capitol Hill ((~~Urban~~)) Regional Center, additional height above the otherwise applicable height limit of 200 feet may be permitted to accommodate floor area achieved through the provisions of subsection 23.47A.013.F and Section 23.58A.042 if the development meets the following requirements:

1. The development does not exceed 350 feet in height, except that rooftop features may exceed 350 feet in height if they comply with subsection 23.47A.012.C.

2. Only extra floor area achieved through subsection 23.47A.013.F may be located above 200 feet.

Section 47. Section 23.47A.013 of the Seattle Municipal Code, last amended by Ordinance 126855, is amended as follows:

23.47A.013 Floor area ratio

A. Floor area ratio (FAR) limits. Except as provided in subsections 23.47A.013.C and 23.47A.013.D, FAR limits apply in C zones and NC zones as shown in Table A for 23.47A.013 and Table B for 23.47A.013. The applicable FAR limit applies to the total chargeable floor area of all structures on the lot.

Table A for 23.47A.013
Floor area ratio (FAR) limit outside of ((~~the~~)) Station Area Overlay ((~~District~~)) Districts

Height limit (in feet)	**FAR**
30	2.5
40	3.0[1]
55	3.75
65	4.5
75	5.5
85	5.75
95	6.25
145	7
200	8.25[2]

Footnotes to Table A for 23.47A.013
[1] Except that zones without a mandatory housing affordability suffix have a maximum FAR of 3.25.
[2] Except that within the First Hill/Capitol Hill ((~~Urban~~)) Regional Center, the maximum FAR is 12 if the development contains at least 4 FAR of residential uses.

* * *

C. Within the Station Area Overlay District within the University ((~~Community Urban~~)) District Regional Center, for office structures permitted prior to 1971, the area of the lot for

purposes of calculating permitted FAR is the tax parcel created prior to the adoption of Ordinance 121846 on which the existing structure is located, provided the office structure is to be part of a functionally related development occupied by a single entity with over 500,000 square feet of area in office use. The floor area of above-grade pedestrian access is exempt from the FAR calculations of this subsection 23.47A.013.C, and the maximum permitted FAR is 8.

D. Within the portion of the Greenwood ((~~Residential~~)) Urban ((~~Village~~)) Center, on lots zoned NC2-55 that are located abutting NW 85th Street between 1st Avenue NW and 3rd Avenue NW, the total permitted FAR within a mixed-use structure containing residential and ((~~non-residential~~)) nonresidential uses is 4.

E. Minimum FAR

1. A minimum FAR shown in Table C for 23.47A.013 is required whenever more than 1,000 square feet of gross floor area is added to or removed from a lot located in:

a. A pedestrian-designated zone in ((~~an urban center, urban village,~~)) a regional center, an urban center, or a Station Area Overlay District; or

b. The Northgate Overlay District and abutting a Major Pedestrian Street as shown on Map A for 23.71.004.

Table C for 23.47A.013
Minimum floor area ratio (FAR)

Height limit (in feet)	**Minimum FAR**
30	1.5
40	1.5
55	2
65	2
75	2
85	2
95	2
145	2.5
200	2.5

2. The minimum FAR requirement provided in subsection 23.47A.013.E.1 does not apply if:

a. Additional floor area is added to an existing structure on a lot that is nonconforming with respect to the minimum FAR shown in Table C for 23.47A.013;

b. The lot is larger than five acres;

c. All existing gross floor area is demolished to create a vacant lot;

d. Parks and open space is the principal use of the lot; or

e. The lot is to be occupied by a nonprofit medical service use that provides a specialized service, such as kidney dialysis, that is not currently provided in the applicable urban ((~~village~~)) center.

3. Portions of the lot designated as a steep slope, wetland, or riparian corridor or as a buffer to one of these areas, as defined in Chapter 25.09, shall not be included when calculating lot size for the purpose of determining the minimum FAR requirement provided in subsection 23.47A.013.E.1.

4. The Director, in consultation with the Director of the Department of Neighborhoods, may waive the minimum FAR requirement provided in subsection 23.47A.013.E.1 for lots that contain a designated Landmark, or for lots within a Landmark District pursuant to Title 25 or within a Special Review District pursuant to Chapter 23.66, if the Director determines a waiver is necessary to preserve the integrity of a Landmark or meet adopted District design and development guidelines.

5. The Director may waive the minimum FAR requirement provided in subsection 23.47A.013.E.1 for lots within the Pike/Pine Conservation Overlay District pursuant to Chapter

23.32, if the Director determines that the proposed development promotes neighborhood conservation objectives.

6. The following gross floor area is not counted toward the minimum FAR requirement provided in subsection 23.47A.013.E.1:

a. All stories, or portions of stories, that are underground; and

b. Gross floor area containing parking.

F. Extra floor area in NC3-200 and NC3P-200 zoned areas in the First Hill/Capitol Hill ((~~Urban~~)) Regional Center

In the NC3-200 and NC3P-200 zones in the First Hill/Capitol Hill ((~~Urban~~)) Regional Center, extra floor area above the otherwise applicable FAR limit of 8.25 for nonresidential structures or 12 for structures with at least 4 FAR in residential use may be achieved pursuant to the provisions of this subsection 23.47A.013.F and Section 23.58A.042 if the development meets the following conditions:

1. Extra floor area must be gained through the transfer of TDP/TDR pursuant to the provisions of Section 23.58A.042. For purposes of calculating the amount of TDP/TDR that may be transferred, the otherwise applicable FAR limits in subsection 23.47.013.A shall be the base FAR.

2. The sending site must be located in a NC3-200 or NC3P-200 zoned area in the First Hill/Capitol Hill ((~~Urban~~)) Regional Center and the lot receiving the transfer of floor area must be on the same block as the sending site.

3. The amount of extra floor gained from this subsection 23.47A.013.F by any one development may not exceed 110,526 square feet.

4. For purposes of this subsection 23.47A.013.F, the transfer of development rights to gain extra ((~~non-residential~~)) nonresidential floor area is TDR and the transfer of development potential to gain extra residential floor area is TDP.

5. The only types of TDP and TDR that may be transferred pursuant to this subsection 23.47A.013.F are Landmark TDP and TDR.

Section 48. Section 23.48.002 of the Seattle Municipal Code, last amended by Ordinance 125792, is amended as follows:

23.48.002 Scope of provisions

A. This Chapter 23.48 identifies uses that are or may be permitted in all Seattle Mixed zones and establishes development standards. The Seattle Mixed zone boundaries are shown on the Official Land Use Map. Seattle Mixed zone designations for specific geographic areas are identified in Table A for 23.48.002. The SM-SLU designation with a height limit suffix may be applied to SM-SLU zoned land in the South Lake Union ((~~Urban~~)) Regional Center. The SM-D designation with a height limit range may be applied to SM-D zoned land in the West Dravus area. The SM-NR designation with a height limit suffix may be applied to SM-NR zoned land in the North Rainier area. The SM-U designation with a height limit suffix may be applied to SM-U zoned land in the University ((~~Community Urban~~)) District Regional Center. The SM-UP designation with a height limit suffix may be applied to SM-UP zoned land in the Uptown ((~~Urban~~)) Regional Center. The SM-RB designation with a height limit suffix may be applied to SM-RB zoned land in the Rainier Beach Urban ((~~Village~~)) Center. The SM-NG designation with a height limit suffix may be applied to SM-NG zoned land in the Northgate ((~~Urban~~)) Regional Center.

Table A for 23.48.002 **Seattle Mixed designations for geographic areas**	
Zone designation	**Geographic area**
SM-D	West Dravus area
SM-NG	Northgate ((~~Urban~~)) Regional Center
SM-NR	North Rainier area
SM-RB	Rainier Beach
SM-SLU	South Lake Union ((~~Urban~~)) Regional Center
SM-U	University ((~~Community Urban~~)) District Regional Center
SM-UP	Uptown ((~~Urban~~)) Regional Center

* * *

Section 49. Section 23.48.021 of the Seattle Municipal Code, last amended by Ordinance 125791, is amended as follows:

23.48.021 Extra floor area in Seattle Mixed zones

* * *

B. Calculation outside of specific areas

1. Means to achieve extra residential floor area. If the maximum height limit for residential use is 85 feet or lower or the lot is located outside of the South Lake Union ((~~Urban~~)) Regional Center, SM-U zones, and the Mount Baker Station Area Overlay District, the applicant shall use bonus residential floor area for affordable housing pursuant to Section 23.58A.014 to achieve all extra residential floor area on the lot.

2. Means to achieve extra ((~~non-residential~~)) nonresidential floor area. If the maximum height limit for ((~~non-residential~~)) nonresidential use is 85 feet or lower or the lot is located outside of the South Lake Union ((~~Urban~~)) Regional Center, SM-U zones, and the Mount Baker Station Area Overlay District, the applicant shall use bonus ((~~non-residential~~)) nonresidential floor area for affordable housing and child care pursuant to Section 23.58A.024 to achieve all extra ((~~non-residential~~)) nonresidential floor area on the lot.

* * *

Section 50. Section 23.48.220 of the Seattle Municipal Code, last amended by Ordinance 126821, is amended as follows:

23.48.220 Floor area ratio (FAR) in South Lake Union ((~~Urban~~)) Regional Center

A. General provisions

1. Except as otherwise specified in this subsection 23.48.220.A, FAR limits for specified SM zones within the South Lake Union ((~~Urban~~)) Regional Center are as shown in Table A for 23.48.220 and Table B for 23.48.220. In the zones shown on Table A for 23.48.220, all non-exempt floor area above the base FAR is considered extra floor area. Extra floor area may be obtained, up to the maximum FAR, only through the provision of public amenities according to Section 23.48.021 and Chapter 23.58A.

Table A for 23.48.220
FAR limits for specified zones in South Lake Union ((~~Urban~~)) Regional Center

Zone	FAR limits for ((~~non-residential~~)) nonresidential uses		Maximum FAR for structures that do not exceed the base height limit and include residential use[1]
	Base FAR	Maximum FAR	
SM-SLU 100/65-145	4.5	6.5	4.5
SM-SLU 85/65-160	4.5	7	4.5
SM-SLU 175/85-280	4.5[2]	8	6
SM-SLU 85-280	0.5/3[3]	NA	6
SM-SLU 240/125-440	5[2]	8	10

Footnotes to Table A for 23.48.220
NA (not applicable) refers to zones where uses are not subject to an FAR limit.
[1] All portions of residential structures that exceed the base height, including portions restricted to the podium height limit, are exempt from FAR limits.
[2] In the SM-SLU 175/85-280, and SM-SLU 240/125-440 zones, an additional increment of 0.5 FAR above the base FAR is permitted on lots meeting the requirements of subsection 23.48.220.A.3.

Table A for 23.48.220 FAR limits for specified zones in South Lake Union ((~~Urban~~)) Regional Center			
Zone	**FAR limits for ((~~non-residential~~)) nonresidential uses**		**Maximum FAR for structures that do not exceed the base height limit and include residential use[1]**
	Base FAR	**Maximum FAR**	
[3] The 3 FAR limit applies to religious facilities. For all other ((~~non-residential~~)) nonresidential uses, the 0.5 FAR limit applies.			

* * *

5. In the SM-SLU 100/65-145, SM-SLU 85/65-160, SM-SLU 175/85-280, SM-SLU 85-280, and SM-SLU 240/125-440 zones within South Lake Union ((~~Urban~~)) Regional Center, for residential tower structures that have only ((~~non-residential~~)) nonresidential uses up to or above the base height limit for residential uses, the FAR limits for all ((~~non-residential~~)) nonresidential uses in the structure are the same as the FAR limits specified for ((~~non-residential~~)) nonresidential uses in Table A for 23.48.220.

* * *

Section 51. Section 23.48.221 of the Seattle Municipal Code, last amended by Ordinance 125163, is amended as follows:

23.48.221 Extra floor area in South Lake Union ((~~Urban~~)) Regional Center

A. Calculation outside of an adopted Local Infrastructure Project Area

1. Means to achieve extra residential floor area. If the maximum height limit for residential use is greater than 85 feet and the lot is located in the South Lake Union ((~~Urban~~)) Regional Center, the applicant shall:

a. ((~~achieve~~)) Achieve 60 percent of the extra residential floor area on the lot by using bonus residential floor area for affordable housing pursuant to Section 23.58A.014; and

b. ((~~achieve~~)) Achieve 40 percent of the extra residential floor area by using open space TDP or Landmark TDP pursuant to subsection 23.48.221.A and Section 23.58A.042.

2. Means to achieve extra ((~~non-residential~~)) nonresidential floor area. If the maximum height limit for ((~~non-residential~~)) nonresidential use is greater than 85 feet and the lot is located in the South Lake Union ((~~Urban~~)) Regional Center, the applicant shall:

a. ((~~achieve~~)) Achieve 75 percent of the extra ((~~non-residential~~)) nonresidential floor area on the lot by using bonus non-residential floor area for affordable housing and child care pursuant to Section 23.58A.024, or housing TDR pursuant to subsection 23.48.221.B and Section 23.58A.042, or both.

b. ((~~achieve~~)) Achieve 25 percent of the extra ((~~non-residential~~)) nonresidential floor area by using open space TDR pursuant to Chapter 23.84A or Landmark TDR pursuant to this subsection 23.48.221.A and Section 23.58A.042.

B. Standards for TDP and TDR

1. All lots in the South Lake Union ((~~Urban~~)) Regional Center that meet the definition of a ((~~TDR or~~)) TDP or TDR site((~~s~~)) in Chapter 23.84A are eligible for transfer.

2. Receiving sites in the South Lake Union ((~~Urban~~)) Regional Center may only receive TDP or TDR from sending sites in the South Lake Union ((~~Urban~~)) Regional Center except that receiving sites in the South Lake Union ((~~Urban~~)) Regional Center may receive Landmark or open space TDP or TDR from sending sites in Downtown or South Downtown if the applicant demonstrates to the satisfaction of the Director that no private or public entities are offering such TDP or TDR for sale in the South Lake Union ((~~Urban~~)) Regional Center, at a price per square foot no greater than the fee-in-lieu rates for the payment option for affordable

housing under Section 23.58A.014 for TDP and the payment option for affordable housing and child care under Section 23.58A.024 for TDR.

3. A cumulative combination of TDR and TDP exceeding a total of five times the lot area may not be transferred from any lot.

* * *

Section 52. Section 23.48.225 of the Seattle Municipal Code, last amended by Ordinance 127099, is amended as follows:

23.48.225 Structure height in South Lake Union ((~~Urban~~)) Regional Center

* * *

E. A proposal to build a structure greater than 85 feet in height in the SM-SLU 85/65-160 and SM-SLU 175/85-280 zones and located north of Mercer Street and West of Fairview Avenue within the South Lake Union ((~~Urban~~)) Regional Center, requires the applicant to show that the proposed structure height will not physically obstruct use of the flight path shown on Map A for 23.48.225 or endanger aircraft operations.

* * *

Section 53. The title of Section 23.48.230 of the Seattle Municipal Code, which section was last amended by Ordinance 125291, is amended as follows:

23.48.230 Additional height in certain SM-zoned areas in ((~~the~~)) South Lake Union ((~~Urban~~)) Regional Center

Section 54. The title of Section 23.48.235 of the Seattle Municipal Code, which section was last amended by Ordinance 125291, is amended as follows:

23.48.235 Upper-level setback requirements in South Lake Union ((~~Urban~~)) Regional Center

Section 55. The title of Section 23.48.240 of the Seattle Municipal Code, which section was last amended by Ordinance 125603, is amended as follows:

23.48.240 Street-level development standards in South Lake Union ((~~Urban~~)) Regional Center

Section 56. Section 23.48.245 of the Seattle Municipal Code, last amended by Ordinance 126685, is amended as follows:

23.48.245 Upper-level development standards in South Lake Union ((~~Urban~~)) Regional Center

Lots in the SM-SLU 100/65-145, SM-SLU 85/65-160, SM-SLU 175/85-280, SM-SLU 85-280, and SM-SLU 240/125-440 zones are subject to upper-level development standards that may include upper-level floor area limits, gross floor area limits and podium heights, upper-level setbacks, facade modulation, maximum facade widths, a limit on the number of towers per block, and tower separation requirements, as specified in this Section 23.48.245. For the purpose of this Section 23.48.245, a tower is a structure that exceeds a height of 65 feet for the SM-SLU 100/65-145 and SM-SLU 85/65-160 zones, 85 feet for the SM-SLU 175/85-280 and SM-SLU 85-280 zones, or 125 feet for the SM-SLU 240/125-440 zone.

* * *

B. Floor area limits and podium heights. The following provisions apply to development in the SM-SLU 100/65-145, SM-SLU 85-280, SM-SLU 85/65-160, SM-SLU 175/85-280, and SM-SLU 240/125-440 zones located within the South Lake Union ((~~Urban~~)) Regional Center:

1. Floor area limit for structures or portions of structures occupied by ((~~non-residential~~)) nonresidential uses:

a. Except as specified in subsections 23.48.245.B.1.b and 23.48.245.B.1.c, there is no floor area limit for ((~~non-residential~~)) nonresidential uses in a structure or portion of structure that does not contain ((~~non-residential~~)) nonresidential uses above 85 feet in height.

b. There is no floor area limit for a structure that includes research and development uses and the uses are in a structure that does not exceed a height of 105 feet, provided that the following conditions are met:

1) A minimum of two floors in the structure are occupied by research and development uses and have a floor-to-floor height of at least 14 feet; and

2) The structure has no more than seven stories above existing or finished grade, whichever is lower, as measured from the lowest story to the highest story of the structure but not including rooftop features permitted under subsection 23.48.025.C. The lowest story shall not include a story that is partially below grade and extends no higher than 4 feet above existing or finished grade, whichever is lower.

c. Within locations in the SM-SLU 175/85-280 zone meeting the standards in subsection 23.48.230.B for extra height in South Lake Union ((~~Urban~~)) Regional Center, there is no floor area limit for structures that do not exceed a height of 120 feet and that are designed for research and development laboratory use and administrative office associated with research and development laboratories.

d. For structures or portions of structures with ((~~non-residential~~)) nonresidential uses that exceed a height of 85 feet, or that exceed the height of 105 feet under the provisions of subsection 23.48.245.B.1.b, or 120 feet under subsection 23.48.245.B.1.c, each story of the structure above the specified podium height indicated for the lot on Map A for 23.48.245, excluding rooftop features or stories with rooftop features that are otherwise

permitted above the height limit under the provisions of subsection 23.48.025.C, is limited to a maximum gross floor area of 24,000 square feet per story, except that the average gross floor area for stories above the specified podium height is 30,000 square feet for structures on a lot that meets the following conditions:

1) The lot has a minimum area of 60,000 square feet; and

2) The lot includes an existing open space or a qualifying Landmark structure and is permitted an additional increment of FAR above the base FAR, as permitted in subsection 23.48.220.A.3.

* * *

C. Upper-level setbacks

1. The following requirements for upper-level setbacks in this subsection 23.48.245.C.1 apply to development that meets the following conditions:

a. The development is on a lot abutting a street segment shown on Table A for 23.48.245; and

b. For lots in the SM-SLU 85-280, SM-SLU 85/65-160, SM-SLU 175/85-280, and SM-SLU 240/125-440 zones located within the South Lake Union ((~~Urban~~)) Regional Center, the development includes a tower structure with residential uses exceeding the base height limit established for residential uses in the zone under subsection 23.48.225.A.1, or includes a structure with ((~~non-residential~~)) nonresidential uses that exceed a height of 95 feet.

* * *

Section 57. Section 23.48.250 of the Seattle Municipal Code, last amended by Ordinance 125603, is amended as follows:

23.48.250 Open space requirement for office uses in South Lake Union ((~~Urban~~)) Regional Center

A. Finding. The ((~~City~~)) Council finds that:

1. With the increase in office development and the Seattle Comprehensive Plan's significant employment growth targets for the South Lake Union Urban Center, office workers will increasingly become major users of open space in the area.

2. Additional major office projects in the South Lake Union ((~~Urban~~)) Regional Center will result in increased use of public open space. If additional major office projects in the South Lake Union ((~~Urban~~)) Regional Center do not provide open space to offset the additional demands on public open space caused by such projects, the result will be overcrowding of public open space, adversely affecting the public health, safety, and welfare.

3. Recent and projected office development in the South Lake Union ((~~Urban~~)) Regional Center is generally comparable to office development in the abutting Downtown ((~~Urban~~)) Regional Center in terms of tenant characteristics, density, and open space need. Therefore, the findings that support the current open space requirement in major downtown office projects are applicable to conditions in the South Lake Union ((~~Urban~~)) Regional Center.

4. The additional open space needed to accommodate office workers is at least 20 square feet for each 1,000 square feet of office space.

5. As in Downtown, smaller office developments in the South Lake Union ((~~Urban~~)) Regional Center may encounter design problems in incorporating open space, and the sizes of open spaces provided for office projects under 85,000 square feet may make them less

attractive and less likely to be used. Therefore, and in order not to discourage small scale office development, projects involving less than 85,000 square feet of new office space should be exempt from any open space requirement.

* * *

Section 58. The title of Section 23.48.255 of the Seattle Municipal Code, which section was enacted by Ordinance 124883, is amended as follows:

23.48.255 Screening and landscaping standards in South Lake Union ((~~Urban~~)) Regional Center

Section 59. The title of Section 23.48.280 of the Seattle Municipal Code, which section was last amended by Ordinance 125558, is amended as follows:

23.48.280 Required parking in South Lake Union ((~~Urban~~)) Regional Center

Section 60. Section 23.48.285 of the Seattle Municipal Code, last amended by Ordinance 125291, is amended as follows:

23.48.285 Parking location, access, and curb cuts in South Lake Union ((~~Urban~~)) Regional Center

A. Parking above the street level of a structure. The following provisions apply to development in the SM-SLU 100/65-145, SM-SLU 85/65-160, SM-SLU 175/85-280, SM-SLU 85-280, and SM-SLU 240/125-440 zones within the South Lake Union ((~~Urban~~)) Regional Center:

1. Except as provided in subsection 23.48.285.B for parking partially above street level and partially below street level, parking within structures is permitted above the street level under the following conditions:

a. One story of parking is permitted above the first story of a structure for each story of parking provided below grade that is of at least equivalent capacity, up to a maximum of two stories of parking above the first story.

b. For parking located on a story above the first story of a structure, a minimum of 30 percent of the length of the parking area measured along each street frontage shall be separated from the street by another use. On lots located at street intersections, the separation of parking area by another use shall be provided at the corner portion(s) of the structure.

c. The parking area on a story above the first story of the structure that is not separated from the street by another use shall be enclosed by facades along all street frontages. Facades shall be designed to minimize the impacts of glare from vehicle headlights and interior garage lighting on pedestrian views from the street.

2. The Director may permit more than two stories of parking above the first story of the structure, or may permit other exceptions to this subsection 23.48.285.A, as a Type I decision, if the Director finds that locating parking below grade is infeasible due to physical site conditions such as a high water table or proximity to a tunnel. In such cases, the Director shall determine the maximum feasible amount of parking that can be provided below grade, if any, and the amount of additional parking to be permitted above street level. Site size is not a basis for granting an exception under this subsection 23.48.285.A.2.

B. Accessory surface parking. In the SM-SLU 100/65-145, SM-SLU 85/65-160, SM-SLU 175/85-280, SM-SLU 85-280, and SM-SLU 240/125-440 zones in the South Lake Union ((~~Urban~~)) Regional Center, accessory surface parking is prohibited unless separated from all street lot lines by another use within a structure.

Section 61. Section 23.48.290 of the Seattle Municipal Code, enacted by Ordinance 125291, is amended as follows:

23.48.290 Transportation management programs

* * *

D. The TMP shall be approved by the Director if, after consulting with the Seattle Department of Transportation, the Director determines that the TMP measures are likely to achieve the mode-share targets for trips made by travel modes other than driving alone for the South Lake Union ((~~Urban~~)) Regional Center in ((~~2035~~)) 2044 that are contained in ((~~Seattle's~~)) any applicable subarea plan for the Regional Center in the Seattle Comprehensive Plan((~~'s Transportation Element~~)).

* * *

Section 62. Section 23.48.602 of the Seattle Municipal Code, enacted by Ordinance 125267, is amended as follows:

23.48.602 Scope of provisions for SM-U zones

The provisions in this Subchapter V of Chapter 23.48 establish regulations for SM-U zones. The SM-U zone designation refers to all zones in the SM category in the University ((~~Community Urban~~)) District Regional Center, and includes the SM-U/R zone. The provisions in this Subchapter V of Chapter 23.48 supplement the provisions of Subchapter I of Chapter 23.48. In cases of conflicts between the provisions in Subchapter I of Chapter 23.48 and this Subchapter V of Chapter 23.48, the provisions in this Subchapter V shall govern.

Section 63. Section 23.48.605 of the Seattle Municipal Code, last amended by Ordinance 126855, is amended as follows:

23.48.605 Uses in SM-U zones

* * *

B. To approve a flexible-use parking garage as an administrative conditional use, the Director shall, after consulting with the Director of the Seattle Department of Transportation, find that:

1. Traffic from the garage will not have substantial adverse effects on peak hour traffic flow to and from Interstate 5 or on traffic circulation in the area around the garage;

2. The vehicular entrances and exits to the garage are located so that they will not disrupt traffic, pedestrian circulation, bicycle circulation, or transit routes;

3. The garage will be operated by a parking company whose primary purpose is to support the University ((~~Community Urban~~)) District Regional Center business community by providing and managing parking facilities for its customers, business owners, and employees.

* * *

Section 64. Section 23.48.610 of the Seattle Municipal Code, enacted by Ordinance 125267, is amended as follows:

23.48.610 Transportation management programs

* * *

D. The TMP shall be approved by the Director if, after consulting with the Seattle Department of Transportation, the Director determines that the TMP measures are likely to achieve the mode-share targets for trips made by travel modes other than driving alone for the University ((~~Community Urban~~)) District Regional Center ((~~in 2035~~)) that are contained in ((~~Seattle's~~)) any applicable subarea plan for the Regional Center in the Seattle Comprehensive Plan((~~'s Transportation Element~~)).

Section 65. Section 23.48.623 of the Seattle Municipal Code, enacted by Ordinance 125267, is amended as follows:

23.48.623 Transfer of development rights (TDR) and <u>transfer of development</u> potential (TDP) in SM-U zones

* * *

Table A for 23.48.623
Permitted use of TDR and TDP

Zone	**Type of TDR or TDP**		
	Landmark	**Open space**	**Vulnerable masonry structure**
SM-U 85, SM-U 75-240, and SM-U 95-320	S, R	S, R	S, R
SM-U/R 75-240	S, R[1]	S, R[1]	S, R[1]
NC3-55[2], NC3-65[2], NC3-75[2]	S	S	S
MR[2]	S	X	X

<u>Key to Table A for 23.48.623</u>
S = Eligible sending lot location
R = Eligible receiving lot location
X = Not eligible as either a sending lot or receiving lot location
Footnotes to Table A for 23.48.623
[1] Only TDP can be used on receiving lots
[2] Only lots located within the University ((~~Community Urban~~)) <u>District Regional</u> Center west of 15th Avenue NE.

* * *

C. Receiving sites. Receiving site locations are shown on Table A for 23.48.623. Only lots zoned SM-U within the University ((~~Community Urban~~)) <u>District Regional</u> Center west of ((~~15 th~~)) <u>15th</u> Avenue NE are eligible receiving sites, and the amount of extra floor area that can be gained through the use of TDR and TDP on an eligible receiving site is specified in Section 23.48.622.

* * *

Section 66. Section 23.48.690 of the Seattle Municipal Code, enacted by Ordinance 125267, is amended as follows:

23.48.690 Development agreements in SM-U zones

A. The Director may recommend that the Council approve a development agreement pursuant to chapter 36.70B RCW for real property that includes land zoned SM-U within the University ((~~Community Urban~~)) District Regional Center.

* * *

Section 67. Section 23.48.710 of the Seattle Municipal Code, enacted by Ordinance 125432, is amended as follows:

23.48.710 Transportation management programs

* * *

D. The TMP shall be approved by the Director if, after consulting with the Seattle Department of Transportation, the Director determines that the TMP measures are likely to achieve the mode-share targets for trips made by travel modes other than driving alone for the Uptown ((~~Urban~~)) Regional Center ((~~in 2035~~)) that are contained in ((~~Seattle's~~)) any applicable subarea plan for the Regional Center contained in the Seattle Comprehensive Plan((~~'s Transportation Element~~)).

Section 68. Section 23.48.720 of the Seattle Municipal Code, last amended by Ordinance 127099, is amended as follows:

23.48.720 Floor area ratio (FAR) in SM-UP zones

A. General provisions. Except as otherwise specified in this subsection 23.48.720.A, FAR limits for SM-U zones are as shown in Table A for 23.48.720.

Table A for 23.48.720
FAR limits for specified zones in the Uptown ((~~Urban~~)) Regional Center

Zone	Base FAR limit for all uses	Maximum FAR for structures that include residential use	FAR Limits for ((~~non-residential~~)) nonresidential uses
SM-UP 65	NA	4.5	4.5
SM-UP 85	NA	5.25	5.25
SM-UP 95	NA	5.75	5.75
SM-UP 160	5	7[1]	2[2]

Footnotes to Table A for 23.48.720
[1] All chargeable floor area above the base FAR is considered extra floor area. Extra floor area must be achieved according to Sections 23.48.021, 23.48.722, and Chapter 23.58A.
[2] In the SM-UP 160((~~,~~)) zone, structures that do not exceed 125 feet in height are permitted an FAR of 7 for ((~~non-residential~~)) nonresidential uses. Additionally, for parcels with lot coverage limited by easements or setbacks for monorails, structures with ((~~non-residential~~)) nonresidential uses are permitted an FAR of 7 regardless of structure height.

* * *

Section 69. Section 23.48.723 of the Seattle Municipal Code, enacted by Ordinance 125732, is amended as follows:

23.48.723 Transfer of development rights (TDR) and transfer of development potential (TDP) in the SM-UP 160 zone

A. General standards

1. The transfer of development rights (TDR) may be used to gain extra ((~~non-residential~~)) nonresidential floor area on a receiving site, and the transfer of development potential (TDP) may be used to gain extra residential floor area in a project on a receiving site.

2. The following types of TDR and TDP may be transferred within the Uptown ((~~Urban~~)) Regional Center, subject to the limits and conditions of this Chapter 23.48 and the standards for the use of TDR and TDP in Section 23.58A.042:

a. Landmark TDR and TDP;

b. Open space TDR and TDP; and

c. Vulnerable masonry structure TDR and TDP.

B. Sending sites. Only sites within the Uptown ((~~Urban~~)) Regional Center in the MR, LR3, or SM-UP zones are eligible sending sites. These sites must meet the definition of an open space, vulnerable masonry structure, or Landmark TDR or TDP sending site in Chapter 23.84A, and must comply with all applicable standards in this Chapter 23.48 and Section 23.58A.042.

* * *

Section 70. Section 23.48.740 of the Seattle Municipal Code, last amended by Ordinance 126157, is amended as follows:

23.48.740 Street-level development standards in SM-UP zones

Street-level development standards in Section 23.48.040 apply to all streets in the SM-UP zones. In addition, the following requirements apply:

A. Street-level facade requirements; setbacks from street lot lines. Street-facing facades of a structure shall be built to the lot line except as follows:

1. The street-facing facades of structures abutting Class 1 Pedestrian Streets, as shown on Map A for 23.48.740, shall be built to the street lot line for a minimum of 70 percent of the facade length, provided that the street frontage of any required outdoor amenity area, other required open space, or usable open space provided in accordance with subsections 23.48.740.B and 23.48.740.C is excluded from the total amount of frontage required to be built to the street lot line.

2. If a building in the Uptown ((~~Urban~~)) Regional Center faces both a Class 1 Pedestrian Street and a Class 2 Pedestrian Street a new structure is only required to provide a primary building entrance on the Class 1 Pedestrian Street.

* * *

Section 71. Section 23.48.780 of the Seattle Municipal Code, enacted by Ordinance 125432, is amended as follows:

23.48.780 Required parking in Uptown ((~~Urban~~)) Regional Center

A. Parking at street level within structures. Parking in the Uptown ((~~Urban~~)) Regional Center is permitted in a story that is partially above street level and partially below street level if the structure is permitted in a setback area under the provisions of subsection 23.48.740.B.2.b.

* * *

Section 72. Section 23.48.785 of the Seattle Municipal Code, enacted by Ordinance 125432, is amended as follows:

23.48.785 Parking location, access, and curb cuts

* * *

B. In the SM-UP 65, SM-UP 85, and the SM-UP 160 zones in the Uptown ((~~Urban~~)) Regional Center, accessory surface parking is prohibited unless separated from all street lot lines by another use within a structure.

Section 73. Section 23.48.802 of the Seattle Municipal Code, enacted by Ordinance 125792, is amended as follows:

23.48.802 Scope of provisions for SM-NG zones

The provisions in this Subchapter VII establish regulations for SM-NG zones. The SM-NG zone designation refers to all zones in the SM category in the Northgate ((~~Urban~~)) Regional Center. The provisions in this Subchapter VII supplement the provisions of Subchapter I of Chapter 23.48. In cases of conflicts between the provisions in Subchapter I of Chapter 23.48 and this Subchapter VII, the provisions in this Subchapter VII apply.

Section 74. Section 23.48.905 of the Seattle Municipal Code, enacted by Ordinance 125791, is amended as follows:

23.48.905 Uses in SM-RB zones

Residential and live-work uses are prohibited in street-level, street-facing facades facing Class 2 Pedestrian Streets in the Rainier Beach ((~~Residential~~)) Urban ((~~Village~~)) Center shown on Map A for 23.48.940.

Section 75. Section 23.48.940 of the Seattle Municipal Code, enacted by Ordinance 125791, is amended as follows:

23.48.940 Street-level development standards in SM-RB zones

* * *

C. Except on pedestrian streets, loading docks may count toward meeting the transparency standards of subsection 23.48.040.B in the Rainier Beach ((~~Residential~~)) Urban ((~~Village~~)) Center.

Section 76. Section 23.49.012 of the Seattle Municipal Code, last amended by Ordinance 126855, is amended as follows:

23.49.012 Bonus floor area for voluntary agreements for housing and child care

* * *

D. Cash option payments for child care. Cash payments under voluntary agreements for bonuses according to subsection 23.49.012.C shall be made prior to issuance of any building permit after the first building permit for a project, and in any event before any permit for any construction activity other than excavation and shoring is issued, or if the bonus is for use of existing floor area, the cash payment shall be made prior to issuance of any permit or modification allowing for use of the space as chargeable floor area. The payments shall be

deposited in a special account established solely to fund expenditures for the development of childcare. Earnings on balances in the special account shall accrue to that account. The Director of Human Services shall use cash payments made in lieu of child care facilities and any earnings thereon to support development of child care facilities. Uses of funds to support child care facilities may include the City's costs to administer projects, not to exceed ten percent of total payments under this Section 23.49.012 and of any earnings thereon, and support provided through loans or grants to owners or developers. The location of child care facilities funded wholly or in part with cash payments shall be prioritized in the following order: 1) within the Downtown ((~~Urban~~)) Regional Center; 2) within ((~~an Urban Center~~)) a regional center adjacent to the Downtown ((~~Urban~~)) Regional Center; 3) in the City within 0.5 mile of a light rail or bus rapid transit station on a route serving the Downtown ((~~Urban~~)) Regional Center; 4) in the City within 0.25 mile of a bus or streetcar stop on a route serving the Downtown ((~~Urban~~)) Regional Center.

Section 77. Section 23.49.019 of the Seattle Municipal Code, last amended by Ordinance 125815, is amended as follows:

23.49.019 Parking quantity, location, and access requirements, and screening and landscaping of parking areas

The regulations in this Section 23.49.019 do not apply to the Pike Market Mixed zones.

* * *

J. Transportation management programs

1. When a development is proposed that is expected to generate 50 or more employees single-occupant vehicle (SOV) trips in any one p.m. hour, the applicant shall prepare

and implement a Transportation Management Program (TMP) consistent with requirements for TMPs in any applicable Director's Rule.

a. For purposes of measuring attainment of SOV goals contained in the TMP, the proportion of SOV trips shall be calculated for the p.m. hour in which an applicant expects the largest number of vehicle trips to be made by employees at the site (the p.m. peak hour of the generator). The proportion of SOV trips shall be calculated by dividing the total number of employees using an SOV to make a trip during the expected peak hour by the total number of employee person trips during the expected peak hour.

b. Compliance with this ((~~section~~)) Section 23.49.019 does not supplant the responsibility of any employer to comply with Seattle's Commute Trip Reduction (CTR) Ordinance.

2. An applicant who proposes multifamily development that is expected to generate 50 or more vehicle trips in any one p.m. hour or demand for 25 or more vehicles parking on the street overnight shall prepare and implement a TMP. The TMP shall be consistent with requirements for TMPs in any applicable Director's Rule. For purposes of measuring attainment of the SOV goal, the proportion of SOV trips shall be calculated for the p.m. hour in which an applicant expects the largest number of vehicle trips to be made by residents of the site (the p.m. peak hour of the generator). The proportion of SOV trips shall be calculated by dividing the total number of residential trips made by SOV during the expected peak hour by the total number of residential person trips.

3. Each owner subject to the requirements of this ((~~section~~)) Section 23.49.019 shall prepare a TMP as described in rules promulgated by the Director, as part of the requirements for obtaining a master use permit.

4. The TMP shall be approved by the Director if, after consulting with the Seattle Department of Transportation, the Director determines that the TMP measures are likely to achieve the mode-share targets for trips made by travel modes other than driving alone for the Downtown ((~~Urban~~)) Regional Center ((~~in 2035~~)) that are contained in ((~~Seattle's~~)) any applicable subarea plan for the Regional Center in the Seattle Comprehensive Plan((~~'s Transportation Element~~)).

* * *

Section 78. Section 23.49.036 of the Seattle Municipal Code, last amended by Ordinance 126188, is amended as follows:

23.49.036 Planned community developments (PCDs)

* * *

B. Public benefit priorities. The Director shall determine public benefit priorities for the PCD. These priorities shall be prepared prior to application for a Master Use Permit. They shall include priorities for public benefits listed in subsection 23.49.036.F and priorities for implementing the goals of the Seattle Comprehensive Plan((~~, including adopted neighborhood plans for the area affected by the PCD,~~)) and a determination of whether the proposed PCD may use public right-of-way area to meet the minimum site size set forth in subsection 23.49.036.E. Before the priorities are prepared, the Director shall cause a public meeting to be held to identify concerns about the site and to receive public input into priorities for public benefits identified in ((~~adopted neighborhood plans and~~)) subsection 23.49.036.F. Notice for the meeting shall be provided pursuant to Section 23.76.011. The Director shall prepare priorities for the PCD taking into account comments made at the public meeting or in writing to the Director, and the criteria in this Section 23.49.036. The Director shall distribute a copy of the priorities to all those who

provided addresses for this purpose at the public meeting, to those who sent in comments or otherwise requested notification, and to the project proponent.

C. A PCD shall not be permitted if the Director determines it would be likely to result in a net loss of housing units or if it would result in significant alteration to any designated feature of a ((~~landmark~~)) Landmark structure, unless a Certificate of Approval for the alteration is granted by the Landmarks Preservation Board.

D. Location

1. PCDs may be permitted in all downtown zones except the PMM zone and the DH1 zone.

2. A portion of a PCD may extend into any non-downtown zone(s) within the Downtown ((~~Urban~~)) Regional Center and adjacent to a downtown zone subject to the following conditions:

a. The provisions of this title applicable in the non-downtown zone(s) regulate the density of ((~~non-residential~~)) nonresidential use by floor area ratio; and

b. The portion of a PCD project located in non-downtown zone(s) must not exceed 20 percent of the total area of the PCD.

E. Minimum size. A PCD shall include a minimum site size of 100,000 square feet within one or more of the ((~~Downtown~~)) downtown zones where PCDs are permitted according to subsection 23.49.036.D.1. The total area of a PCD shall be contiguous. Public right-of-way shall not be considered a break in contiguity. At the Director's discretion, public right-of-way area may be included in the minimum area calculations if actions related to the PCD will result in significant enhancements to the streetscape of the public right-of-way, improved transit access

and expanded transit facilities in the area, and/or significant improvement to local circulation, especially for transit and pedestrians.

F. Evaluation of PCDs. A proposed PCD shall be evaluated on the basis of public benefits provided, possible impacts of the project, and consistency with the standards contained in this subsection 23.49.036.F.

1. Public benefits. A proposed PCD shall address the priorities for public benefits identified through the process outlined in subsection 23.49.036.B. The PCD shall include at least three of the following elements:

a. ((~~low~~)) Low-income housing,

b. ((~~townhouse~~)) Townhouse development,

c. ((~~historic~~)) Historic preservation,

d. ((~~public~~)) Public open space,

((~~e. implementation of adopted neighborhood plans,~~

~~f. improvements~~)) e. Improvements in pedestrian circulation,

((~~g. improvements~~)) f. Improvements in urban form,

((~~h. improvements~~)) g. Improvements in transit facilities,

((~~i. green~~)) h. Green stormwater infrastructure beyond the requirements of the Stormwater Code (Chapters 22.800 through 22.808), or

((~~j. other~~)) i. Other elements that further an adopted City policy and provide a demonstrable public benefit.

2. Potential impacts. The Director shall evaluate the potential impacts of a proposed PCD including, but not necessarily limited to, the impacts on housing, particularly low-

income housing, transportation systems, parking, energy, and public services, as well as environmental factors such as noise, air, light, glare, public views, and water quality.

3. The Director may place conditions on the proposed PCD in order to make it compatible with areas adjacent to Downtown that could be affected by the PCD.

4. When the proposed PCD is located in the Pioneer Square Preservation District or International District Special Review District, the Board of the District(s) in which the PCD is located shall review the proposal and make a recommendation to the Department of Neighborhoods Director who shall make a recommendation to the Director prior to the Director's decision on the PCD.

* * *

H. Exceptions to ((~~Standards.~~)) standards

1. Portions of a project may exceed the floor area ratio (FAR) permitted in the zone or zones in which the PCD is located, but the maximum chargeable floor area allowed for the PCD as a whole shall meet the requirements of the zone or zones in which it is located.

2. Except as provided in subsection 23.49.036.H.3 ((~~of this section~~)), any requirements of this ((~~chapter~~)) Chapter 23.49 may be varied through the PCD process in order to provide public benefits identified in subsection 23.49.036.F.

3. Exceptions to the following provisions are not permitted through the PCD process:

a. The following provisions of Subchapter I, General Standards:

((~~f~~))1) Applicable height limits,

((~~f~~))2) Light and glare standards,

((~~f~~))3) Noise standards,

((~~(~~))4) Odor standards,

((~~(~~))5) Minimum sidewalk widths,

((~~(~~))6) View corridor requirements,

((~~(~~))7) Nonconforming uses,

((~~(~~))8) Nonconforming structures, when the nonconformity is to one ((~~(1)~~)) of the standards listed in this subsection 23.49.036.H.3.a;

b. Use provisions except for provisions for principal and accessory parking;

c. Transfer of development rights regulations;

d. Bonus ratios and amounts assigned to public benefit features;

e. Development standards of adjacent zones outside the Downtown ((~~Urban~~)) Regional Center in which a PCD may be partially located according to subsection 23.49.036.D.2 ((~~of this section~~)).

f. Provisions for allowing increases in floor area above the base FAR and for allowing residential floor area above the base height limit.

Section 79. Table A for Section 23.50.012 of the Seattle Municipal Code, which section was last amended by Ordinance 127099, is amended as follows:

23.50.012 Permitted and prohibited uses

* * *

Table A for 23.50.012 **Uses in Industrial zones**				
Uses	**Permitted and prohibited uses by zone**			
	IB	**IG1 and IG2 (general)**	**IG1 in the Duwamish M/I Center**	**IG2 in the Duwamish M/I Center**
* * *				
L. TRANSPORTATION FACILITIES				

Table A for 23.50.012 Uses in Industrial zones				
Uses	**Permitted and prohibited uses by zone**			
	IB	**IG1 and IG2 (general)**	**IG1 in the Duwamish M/I Center**	**IG2 in the Duwamish M/I Center**
L.1. Cargo terminals	P	P	P	P
L.2. Parking and moorage				
L.2.a. Boat moorage	P	P	P	P
L.2.b. Dry boat storage	P	P	P	P
L.2.c. Parking, flexible-use	P	P	X(5)	X(5)
L.2.d. Park and ride facilities	P(15)	P(15)	CU	CU
L.2.e. Towing services	P	P	P	P
L.3. Passenger terminals	P	P	P	P
L.4. Rail transit facilities	P	P	P	P
L.5. Transportation facilities, air				
L.5.a. Airports (land-based)	X	CCU	CCU	CCU
L.5.b. Airports (water-based)	X	CCU	CCU	CCU
L.5.c. Heliports	X	CCU	CCU	CCU
L.5.d. Helistops	CCU	CCU	CCU	CCU
L.6. Vehicle storage and maintenance				
L.6.a. Bus bases	CU	CU	CU	CU

Table A for 23.50.012
Uses in Industrial zones

Uses	Permitted and prohibited uses by zone			
	IB	**IG1 and IG2 (general)**	**IG1 in the Duwamish M/I Center**	**IG2 in the Duwamish M/I Center**
L.6.b. Railroad switchyards	P	P	P	P
L.6.c. Railroad switchyards with a mechanized hump	X	CU	CU	CU
L.6.d. Transportation services, personal	P	P	P	P

* * *

Key to Table A for 23.50.012
CU = Administrative conditional use
CCU = Council conditional use
EB = Permitted only in a building existing on October 7, 1987.
EB/CU = Administrative conditional use permitted only in a building existing on October 7, 1987.
P = Permitted
X = Prohibited

Footnotes to Table A for 23.50.012
(1) Except within designated manufacturing and industrial centers, where they are permitted only on rooftops and/or as agricultural uses within an enclosed building. Except for agricultural uses within an enclosed building operating prior to January 4, 2016, agricultural uses within an enclosed building are not permitted in the IG1 zone. Agricultural uses within an enclosed building within designated manufacturing and industrial centers (excluding associated office or food processing areas) shall not exceed:
(a) 5,000 square feet in IG1 zones for agricultural uses within an enclosed building established prior to January 4, 2016;
(b) 10,000 square feet in IB zones; and
(c) 20,000 square feet in IG2 zones.
(2) In addition to the provisions of this Chapter 23.50, urban farms that entail major cannabis activity are regulated by Section 23.42.058.
(3) Animal shelters and kennels maintained and operated for the impounding, holding and/or disposal of lost, stray, unwanted, dead or injured animals are permitted.
(4) Subject to subsection 23.50.012.E.
(5) Parking required for a spectator sports facility or exhibition hall is allowed and shall be permitted to be used as flexible-use parking or shared with another such facility to meet its

Table A for 23.50.012
Uses in Industrial zones

Uses	Permitted and prohibited uses by zone			
	IB	IG1 and IG2 (general)	IG1 in the Duwamish M/I Center	IG2 in the Duwamish M/I Center

required parking. A spectator sports facility or exhibition hall within the Stadium Transition Area Overlay District may reserve parking. Such reserved non-required parking shall be permitted to be used as flexible-use parking and is exempt from the one-space-per-650-square-feet ratio under the following circumstances:

(a) The parking is owned and operated by the owner of the spectator sports facility or exhibition hall, and

(b) The parking is reserved for events in the spectator sports facility or exhibition hall, and

(c) The reserved parking is outside of the Stadium Transition Area Overlay District, and south of South Royal Brougham Way, west of 6th Avenue South and north of South Atlantic Street. Parking that is covenanted to meet required parking will not be considered reserved parking.

(6) Medical service uses over 10,000 square feet, within 2,500 feet of a medical Major Institution Overlay District boundary, require administrative conditional use approval, unless included in an adopted ((~~major institution~~)) Major Institution master plan. See Section 23.50.014.

(7) High-impact uses may be permitted as conditional uses as provided in subsection 23.50.014.B.5.

(8) Research and education facilities that are a part of a college or university, and that are water-dependent or water-related, as defined by Section 23.60A.944, are permitted in new and existing buildings in the ((~~Ballard/Interbay Northend~~)) Ballard/Interbay/Northend Manufacturing ((~~&~~)) and Industrial Center.

(9) A college or university offering a primarily vocational curriculum within the zone is permitted.

(10) Hospitals may be permitted as a conditional use where accessory to a research and development laboratory or an institute for advanced study pursuant to subsection 23.50.014.B.12.

(11) Major institution uses are permitted only in a building existing on October 7, 1987, except that such uses are permitted on properties located outside of the Ballard/Interbay/Northend Manufacturing and Industrial Center that are located in an area south of the Lake Washington Ship Canal, east of 8th Avenue West, north of West Nickerson Street, and west of 3rd Avenue West regardless of whether the use is located in a building existing on October 7, 1987.

(12) Museums are prohibited except in buildings or structures that are designated City of Seattle ((~~landmarks~~)) Landmarks.

(13) Transitional encampments accessory to religious facilities or to principal uses located on property owned or controlled by a religious organization are regulated by Section 23.42.054.

(14) Heavy manufacturing uses may be permitted as a conditional use within the Queen Anne Interbay area as provided in subsection 23.50.014.C.

(15) Park and ride facilities are not permitted within 3,000 feet of the Downtown ((~~Urban~~))

Table A for 23.50.012 Uses in Industrial zones				
Uses	**Permitted and prohibited uses by zone**			
	IB	**IG1 and IG2 (general)**	**IG1 in the Duwamish M/I Center**	**IG2 in the Duwamish M/I Center**
Regional Center. (16) Subject to subsection 23.50.014.B.7.e.				

Section 80. Table A for Section 23.50A.040 of the Seattle Municipal Code, which section was enacted by Ordinance 126862, is amended as follows:

23.50A.040 Permitted and prohibited uses

* * *

Table A for 23.50A.040 Uses in Industrial zones					
Uses	**Qualifies as Industrial?**	**Permitted and prohibited uses by zone**			
		MML	**II**	**UI**	**IC**
* * *					
L. TRANSPORTATION FACILITIES					
L.1. Cargo terminals	Yes	P	P	P	P
L.2. Parking and moorage					
L.2.a. Boat moorage	Yes	P	P	P	P
L.2.b. Dry boat storage	Yes	P	P	P	P
L.2.c. Parking, flexible-use	No	X (4)	X	P (4)	P
L.2.d. Park and ride facilities	No	X	X	P (12)	P (12)
L.2.e. Towing services	Yes	P	P	P	P
L.3. Passenger terminals	Yes	P (13)	P (13)	P (13)	P
L.4. Rail transit facilities	Yes	P	P	P	P
L.5. Transportation facilities, air					
L.5.a. Airports (land-based)	Yes	CCU	CCU	X	CCU
L.5.b. Airports (water-based)	Yes	CCU	CCU	X	CCU
L.5.c. Heliports	Yes	CCU	CCU	X	CCU
L.5.d. Helistops	Yes	CCU	CCU	CCU	CCU
L.6. Vehicle storage and maintenance					

Table A for 23.50A.040
Uses in Industrial zones

Uses	Qualifies as Industrial?	Permitted and prohibited uses by zone			
		MML	II	UI	IC
L.6.a. Bus bases	Yes	CU	CU	CU	CU
L.6.b. Railroad switchyards	Yes	P	CU	CU	P
L.6.c. Railroad switchyards with a mechanized hump	Yes	P	CU	CU	CU
L.6.d. Transportation services, personal	Yes	P	P	P	P

* * *

Key for Table A for 23.50A.040
CU = Administrative conditional use
CCU = Council conditional use
EB = Permitted only in a building existing on June 1, 2023
EB/CU = Administrative conditional use permitted only in a building existing on June 1, 2023
P = Permitted
X = Prohibited

Footnotes to Table A for 23.50A.040
(1) In addition to the provisions in this Chapter 23.50A, urban farms that entail major ((~~marijuana~~)) cannabis activity are regulated by Section 23.42.058.
(2) Animal shelters and kennels maintained and operated for the impounding, holding and/or disposal of lost, stray, unwanted, dead, or injured animals are permitted.
(3) Subject to subsection 23.50A.040.F.
(4) Parking required for a spectator sports facility or exhibition hall is allowed and shall be permitted to be used as flexible-use parking or shared with another such facility to meet its required parking. A spectator sports facility or exhibition hall within the Stadium Transition Area Overlay District may reserve parking. Such reserved non-required parking shall be permitted to be used as flexible-use parking and is exempt from the one-space-per-650-square-feet ratio under the following circumstances:
(a) The parking is owned and operated by the owner of the spectator sports facility or exhibition hall, and
(b) The parking is reserved for events in the spectator sports facility or exhibition hall, and
(c) The reserved parking is outside of the Stadium Transition Area Overlay District, and south of South Royal Brougham Way, west of 6th Avenue South and north of South Atlantic Street. Parking that is covenanted to meet required parking will not be considered reserved parking.
(5) The high-impact uses listed in subsection 23.50A.062.D may be permitted as conditional uses.
(6) The high-impact uses listed in subsection 23.50A.062.H may be permitted as conditional

Table A for 23.50A.040 Uses in Industrial zones					
Uses	**Qualifies as Industrial?**	**Permitted and prohibited uses by zone**			
		MML	**II**	**UI**	**IC**
uses. (7) Research and education facilities that are a part of a college or university, and that are water-dependent or water-related as defined by Section 23.60A.944 or offer a primarily vocational curriculum are permitted, and shall be classified as an industrial use. (8) Major institution uses are permitted only in a building existing on June 1, 2023, except that such uses are permitted on properties located outside of the Ballard/Interbay/Northend Manufacturing and Industrial Center that are located in an area south of the Lake Washington Ship Canal, east of 8th Avenue West, north of West Nickerson Street, and west of 3rd Avenue West regardless of whether the use is located in a building existing on June 1, 2023. (9) Museums are prohibited except in buildings or structures that are designated City of Seattle ((~~landmarks~~)) Landmarks. (10) Transitional encampments accessory to religious facilities or to principal uses located on property owned or controlled by a religious organization are regulated by Section 23.42.054. (11) Heavy manufacturing uses meeting the criteria in subsection 23.50A.062.G may be permitted as a conditional use. All other heavy manufacturing uses are prohibited in the UI, II and IC zones and in the MML zone within 1,500 linear feet of residentially zoned or neighborhood commercial zoned properties. Heavy Manufacturing uses not within 1,500 linear feet of residentially zoned or neighborhood commercial zoned properties are permitted. (12) Park and ride facilities are not permitted within 3,000 feet of the Downtown ((~~Urban~~)) Regional Center. (13) Parking lots intended and designed for, and solely used for, pick-up and drop-off of passengers using ride-share services or transportation network companies is included as a part of the passenger terminal use category for industrial zones. (14) Subject to subsection 23.50A.062.F.					

Section 81. Section 23.50A.190 of the Seattle Municipal Code, enacted by Ordinance 126862, is amended as follows:

23.50A.190 Screening and location of parking in an II 85-240 zone

Those developments that gain extra floor area above the base FAR in an II 85-240 zone are subject to the following, in addition to any other applicable parking screening requirements in this Section 23.50A.190.

* * *

B. Parking at street level

1. Parking is not permitted at street level within a structure along a lot line abutting a street bounding the Downtown ((~~Urban~~)) Regional Center or a street shown on Map A for 23.50A.190, unless separated from the street by other uses, except that garage and loading doors and access to parking need not be separated.

2. Parking is permitted at street level within a structure along a street lot line abutting a street not specified in subsection 23.50A.190.B.1 subject to the following requirements:

a. Any parking not separated from the street lot line by another use is screened from view at the street level, except that garage and loading doors and access to parking need not be screened.

b. The facade facing the street lot line is enhanced by architectural detailing, artwork, landscaping, or similar visual interest features.

3. Parking above street level. Parking is not permitted above street level unless it is separated from abutting street lot lines by another use, except that for structures located on a lot that is less than 150 feet in depth, as measured from the lot line with the greatest street frontage, parking is permitted above the first story under the following conditions:

a. One story of parking shall be permitted above the first story of a structure for each story of parking provided below grade that is of at least equivalent capacity, up to a maximum of two stories of parking above the first story.

b. Above the first story of a structure, parking is permitted up to a maximum of 70 percent of the length of each street-facing facade. Any additional parking must be separated from the street by another use. For structures located on corner lots, separation by

another use shall be provided at the corner portion(s) of the structure for a minimum of 15 percent of the length of each street-facing facade.

4. For all parking located on stories above street level that is not separated from the street by another use, the parking shall be screened from view at street level, and, through the use of materials, fenestration, or other architectural treatment, the screening shall be designed to provide visual interest and to integrate the screened portions of the building facade with the overall design of the structure's street-facing facades.

5. The Director may permit, as a Type I decision, exceptions to subsection 23.50A.190.B.2.a to permit more parking above street level than otherwise allowed, if the Director finds that locating permitted parking below grade is infeasible due to physical site conditions such as a high-water table, contaminated soil conditions, or proximity to a tunnel. In such cases, the Director shall determine the maximum feasible amount of parking that can be provided below grade, if any, and the amount of additional parking to be permitted above street level.

* * *

Section 82. Section 23.50A.360 of the Seattle Municipal Code, enacted by Ordinance 126862, is amended as follows:

23.50A.360 Transportation management programs in the Industry and Innovation zone

* * *

C. The TMP shall be approved by the Director if, after consulting with Seattle Department of Transportation, the Director determines that the TMP measures are likely to achieve a mode-share target that is the average of mode-share targets for ((~~Urban Centers~~)) regional centers, with the exception of the Downtown ((~~Urban~~)) Regional Center, in any

applicable subarea plans for regional centers in the Seattle ((~~2035~~)) Comprehensive Plan for trips made by employees driving alone who would work in the proposed development.

Section 83. Section 23.51A.004 of the Seattle Municipal Code, last amended by Ordinance 125558, is amended as follows:

23.51A.004 Public facilities in multifamily zones

* * *

B. The following uses in public facilities are permitted outright in all multifamily zones if the development standards for institutions in Section 23.45.570, other than dispersion requirements, are met, except as otherwise provided in subsection 23.51A.004.B.6:

1. Police precinct stations;

2. Fire stations;

3. Public boat moorages;

4. Utility service uses;

5. Other uses similar to any of the uses listed in this subsection 23.51A.004.B; and

6. Youth service centers existing as of January 1, 2013, in public facilities operated by King County in an LR3 zone within ((~~an Urban Center~~)) a regional center and replacement, additions or expansions to such King County public facilities. For youth service centers, the development standards for institutions in Section 23.45.570 apply, and subsections 23.45.570.D and 23.45.570.F relating to structure width and setbacks may be waived or modified by the Director as a Type II decision. The Director's decision to waive or modify standards shall be based on a finding that the waiver or modification is needed to accommodate unique programming, public service delivery, or structural needs of the facility and that the following

urban design objectives are met. The Director's decision shall include conditions to mitigate all substantial impacts caused by such a waiver or modification.

a. Objective 1: Create visual interest along and activate each street frontage. Examples for achieving this objective include, but are not limited to, the following:

1) Incorporate prominent entrances and other features that welcome pedestrians;

2) Add visual interest using architectural detailing of the facade, transparency, decorative materials, or design features; and

3) Use signage consistent with ((~~the Sign Code,~~)) Chapter 23.55((~~,~~)) that helps orient pedestrians and adds interest to the street environment.

b. Objective 2: Create a continuous pedestrian environment along each frontage of the development in LR3. Examples for achieving this objective include, but are not limited to, the following:

1) Incorporate shade and rain protection, such as awnings, building overhangs, benches, freestanding pavilions, or kiosks;

2) Where site dimensions and program conditions allow, provide a landscaped setback between the structure and sidewalk; and

3) Design new or existing bus stops to integrate transit shelters, benches, and decorative treatments with the adjacent facade.

c. Objective 3: Address the bulk and scale of the building by design treatments that transition to the scale of nearby development. Examples for achieving this objective include, but are not limited to, the following:

1) Break down the apparent scale of the building and reduce the impact of blank walls by using modulation or decorative facade elements, such as material, shape, color, architectural detailing, painting, screening, artwork, or vegetated walls; and

2) Use landscaped setbacks where appropriate.

* * *

D. The following public facilities are prohibited in all multifamily zones((:))

1. Jails, except for youth service centers existing as of January 1, 2013, in public facilities operated by King County within ((~~an Urban Center~~)) a regional center;

2. Work-release centers;

3. Bus bases;

4. Sewage treatment plants;

5. Animal control shelters; and

6. Post office distribution centers.

* * *

Section 84. Section 23.52.004 of the Seattle Municipal Code, last amended by Ordinance 125757, is amended as follows:

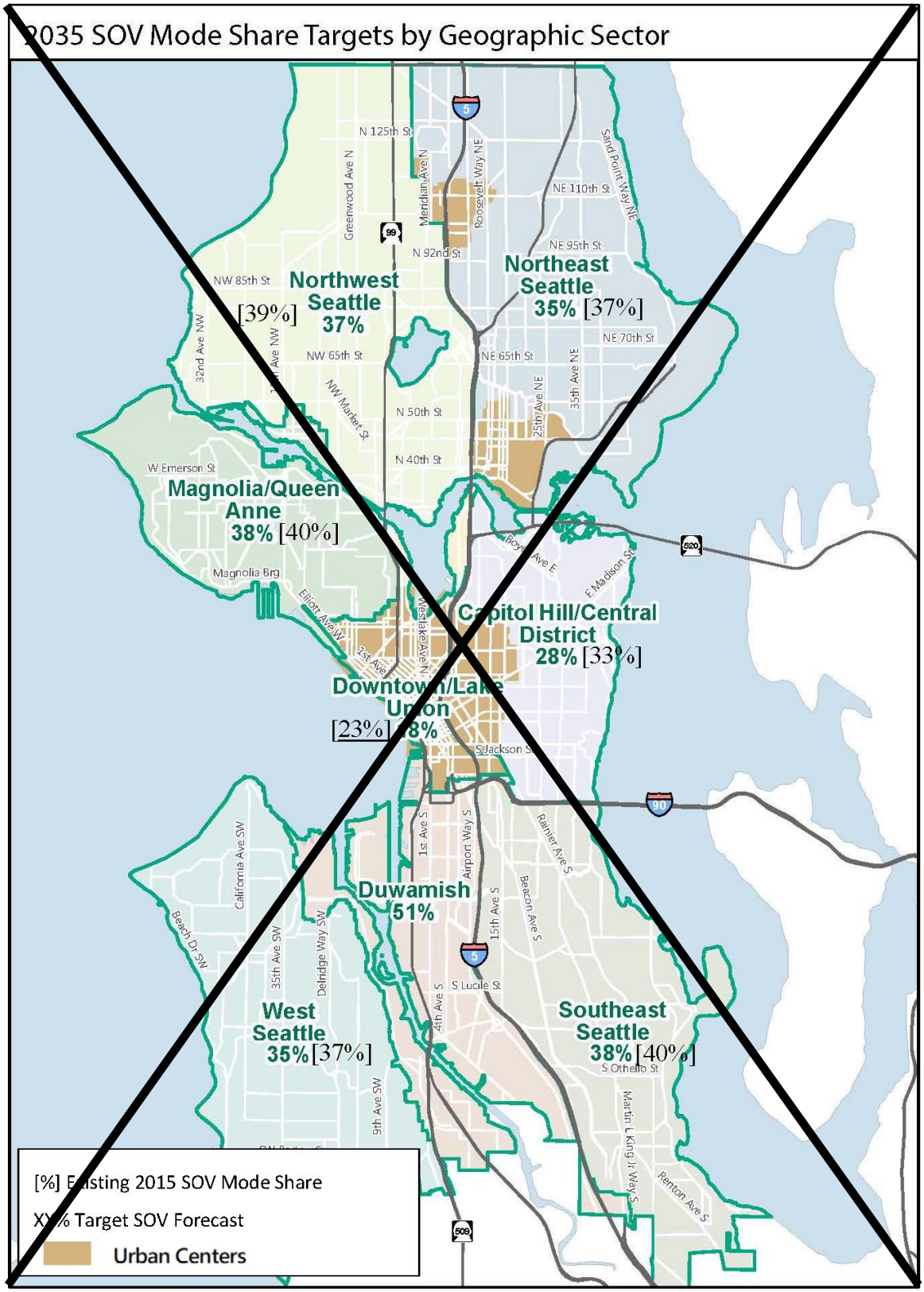
23.52.004 Requirement to meet transportation level-of-service standards

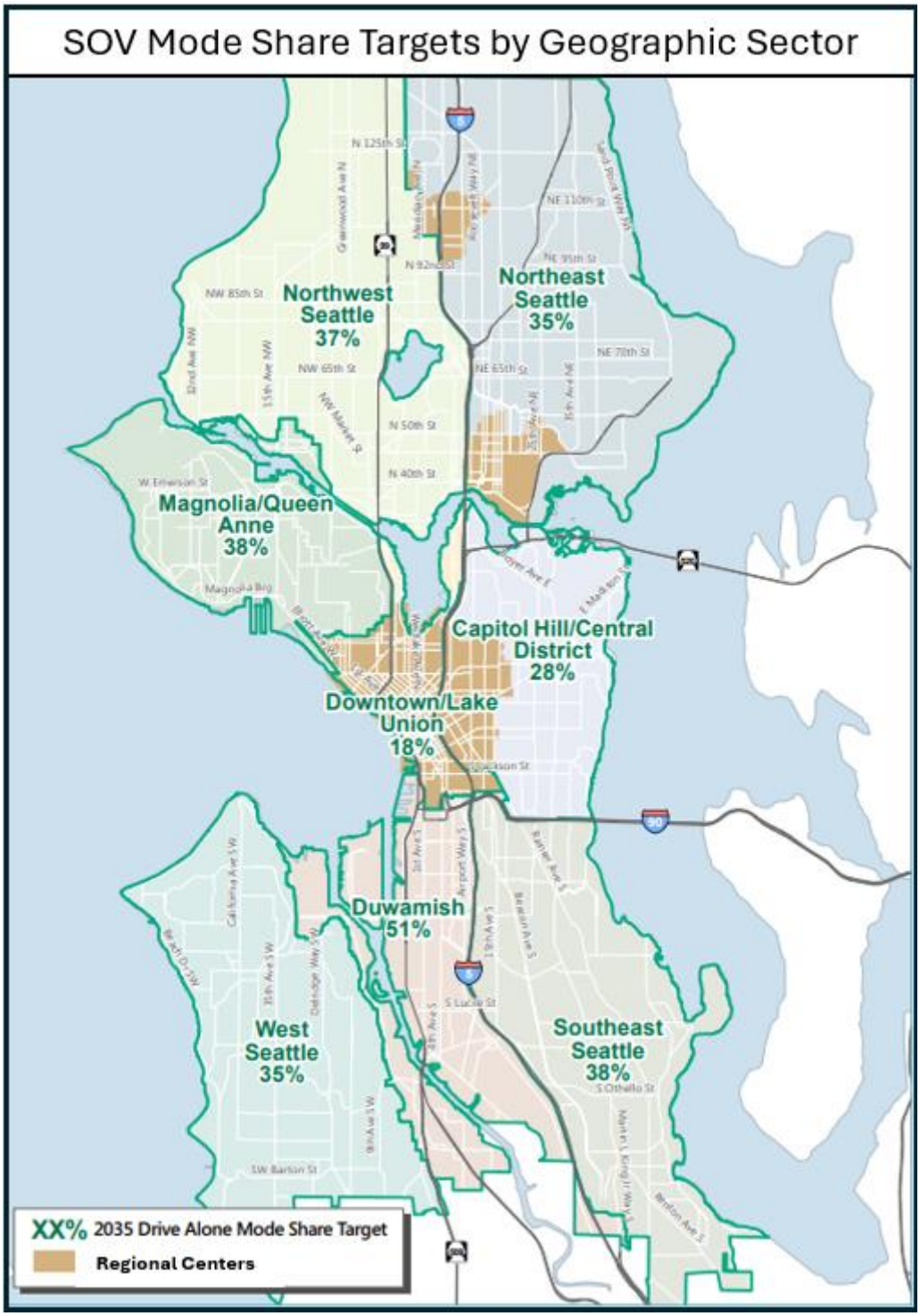
A. Applicability of this Subchapter I. Development that meets the following thresholds must contribute to achieving the percentage reduction targets shown on Map A for 23.52.004, which includes options for reducing the single-occupancy vehicle (SOV) trips associated with the development:

1. Proposed development in excess of any of the following: 30 dwelling units, 30 sleeping rooms, or 4,000 square feet of gross floor area in new nonresidential uses except for proposed development as provided in subsection 23.52.004.A.2;

2. Proposed development located in IG1 or IG2 zones and having more than 30,000 square feet of gross floor area in uses categorized as agricultural, high impact, manufacturing, storage, transportation facilities, or utility uses.

Map A for 23.52.004: 2035 SOV Mode Share Targets by Geographic Sector




SOV Mode Share Targets by Geographic Sector
Northwest Seattle 37%
Northeast Seattle 35%
Magnolia/Queen Anne 38%
Capitol Hill/Central District 28%
Downtown/Lake Union 18%
Duwamish 51%
West Seattle 35%
Southeast Seattle 38%
XX% 2035 Drive Alone Mode Share Target
Regional Centers

1

B. Requirements. Development above the thresholds in subsection 23.52.004.A shall contribute toward achieving the SOV reduction targets identified on Map A for 23.52.004, either based on location of the development in ((~~an urban center~~)) a regional center, ((~~hub urban village~~)) an urban center, or within one-half mile's walking distance of a light rail station, or where these locational criteria are not met, by selecting and implementing at least one mitigation measure from a list of measures identified in a Joint Directors' Rule adopted by the Directors of the Department of Construction and Inspections and the Seattle Department of Transportation.

Section 85. Section 23.52.008 of the Seattle Municipal Code, last amended by Ordinance 126157, is amended as follows:

23.52.008 Applicability of this Subchapter II

A. Applicability. The requirements of this Subchapter II apply to proposed new development as described in Table A for 23.52.008. Development located within ((~~an urban center or urban village~~)) a regional center or an urban center that is subject to SEPA environmental review per Chapter 25.05 is exempt from this Subchapter II of Chapter 23.52.

Table A for 23.52.008
Development ((~~Location~~)) location and ((~~Thresholds~~)) thresholds

Development location	**Number of dwelling units**	**Gross square feet of ((~~non-residential~~)) nonresidential uses[1] when located in a mixed-use development[2]**
((~~Urban~~)) Regional centers, other than the Downtown ((~~Urban~~)) Regional Center	31 to 200	Greater than 12,000 up to 30,000
Downtown ((~~Urban~~)) Regional Center	81 to 250	Greater than 12,000 up to 30,000
Urban ((~~villages~~)) centers	31 to 200	Greater than 12,000 up to 30,000
Outside ((~~urban centers and urban villages~~)) regional centers and urban centers	NA	NA

Table A for 23.52.008 Development ((~~Location~~)) location and ((~~Thresholds~~)) thresholds		
Development location	**Number of dwelling units**	**Gross square feet of ((~~non-residential~~)) nonresidential uses[1] when located in a mixed-use development[2]**
NA: Not applicable Footnotes to Table A for 23.52.008((~~:~~)) [1] Not including gross floor area dedicated to accessory parking. [2] The mixed-use development must contain at least one dwelling unit.		

* * *

Section 86. Section 23.53.006 of the Seattle Municipal Code, last amended by Ordinance 127099, is amended as follows:

23.53.006 Pedestrian access and circulation

* * *

C. ((~~Within urban centers and urban villages.~~)) Within ((~~urban centers and urban villages~~)) regional and urban centers, sidewalks, curbs, and curb ramps are required when new lots, other than unit lots, are created through the full or short subdivision platting process or when development is proposed on a lot that abuts any existing street in any zone, except as specified in subsection 23.53.006.F. If the existing street includes sidewalks, curbs, curb ramps, and accessible crossings that do not comply with the Streets Illustrated Right-of-Way Improvements Manual or successor rule, they shall be brought into compliance.

D. ((~~Outside urban centers and urban villages.~~)) Outside ((~~urban centers and urban villages~~)) regional and urban centers, sidewalks, curbs, and curb ramps are required on an existing street in any of the following circumstances, except as provided in subsection 23.53.006.F.

1. In any zone with a pedestrian designation, sidewalks, curbs, and curb ramps are required when new lots, other than unit lots, are created through the full or short subdivision platting process or when development is proposed.

2. In industrial zones, on streets designated on Map A for 23.50A.190, sidewalks, curbs, and curb ramps are required when new lots are created through the full or short subdivision platting process or when development is proposed. Sidewalks, curbs, and curb ramps are required only for the portion of the lot that abuts the designated street.

3. On arterials, except in the MML zone, sidewalks, curbs, and curb ramps are required when new lots, other than unit lots, are created through the full or short subdivision platting process or when development is proposed. Sidewalks, curbs, and curb ramps are required only for the portion of the lot that abuts the arterial.

4. In neighborhood residential zones, sidewalks, curbs, and curb ramps are required when ten or more lots are created through the full subdivision platting process or when ten or more dwelling units are developed.

5. Except in neighborhood residential zones and the MML zone, sidewalks, curbs, and curb ramps are required when six or more lots, other than unit lots, are created through the full or short subdivision platting process or when six or more dwelling units are developed.

6. In all zones, except the MML zone, sidewalks, curbs, and curb ramps are required when the following ((~~non-residential~~)) nonresidential uses are developed:

a. Seven hundred and fifty square feet or more of gross floor area of major and minor vehicle repair uses and multi-purpose retail sales; or

b. Four thousand square feet or more of ((~~non-residential~~)) nonresidential uses not listed in subsection 23.53.006.D.6.a.

* * *

Section 87. Section 23.54.015 of the Seattle Municipal Code, last amended by Ordinance 127099, is amended as follows:

23.54.015 Required parking and maximum parking limits

* * *

C. Maximum parking limits for specific zones or areas

1. In the Stadium Transition Area Overlay District certain uses are subject to a maximum parking ratio pursuant to subsection 23.74.010.A.1.b. When there are multiple uses on a lot, the total parking requirement for all uses subject to a maximum ratio cannot exceed the aggregate maximum for those uses under Section 23.74.010.

2. In all commercial zones, except C2 zones outside of urban ((~~villages~~)) centers, no more than 145 spaces per lot may be provided as surface parking or as flexible-use parking.

3. In all multifamily zones, commercial uses are limited to no more than ten parking spaces per business establishment.

4. In the Northgate Overlay District, the Director may permit parking to exceed applicable maximum parking limits as a Type I decision pursuant to Chapter 23.76 if:

a. The parking is provided in a structure according to a joint-use parking agreement with King County Metro Transit; and

b. It can be demonstrated to the satisfaction of the Director through a parking demand study that the spaces are only needed to meet evening and weekend demand or as overflow on less than ten percent of the weekdays in a year, and the spaces shall otherwise be available for daytime use by the general public.

5. Notwithstanding the minimum parking requirements set out in Table A for 23.54.015, in the Industry and Innovation zones, the maximum parking ratio for all uses is one space per 1,000 square feet of gross floor area.

* * *

Table A for 23.54.015
Required parking for ((~~non-residential~~)) nonresidential uses other than institutions

Use		Minimum parking required
* * *		
II. Non-residential use requirements for specific areas		
I.	((~~Non-residential~~)) Nonresidential uses in ((~~urban~~)) regional centers or ((~~the~~)) Station Area Overlay ((~~District~~)) Districts [5]	No minimum requirement
J.	Non-residential uses in urban ((~~villages~~)) centers that are not within ((~~an urban center or the~~)) a Station Area Overlay District, if the non-residential use is located within a frequent transit service area[5]	No minimum requirement
* * *		

Footnotes for Table A for 23.54.015
[1] No parking is required for urban farms or community gardens in residential zones.
[2] Required parking for spectator sports facilities or exhibition halls must be available when the facility or exhibition hall is in use. A facility shall be considered to be "in use" during the period beginning three hours before an event is scheduled to begin and ending one hour after a scheduled event is expected to end. For sports events of variable or uncertain duration, the expected event length shall be the average length of the events of the same type for which the most recent data are available, provided it is within the past five years. During an inaugural season, or for nonrecurring events, the best available good faith estimate of event duration will be used. A facility will not be deemed to be "in use" by virtue of the fact that administrative or maintenance personnel are present. The Director may reduce the required parking for any event when projected attendance for a spectator sports facility is certified to be 50 percent or less of the facility's seating capacity, to an amount not less than that required for the certified projected attendance, at the rate of one space for each ten fixed seats of certified projected attendance. An application for reduction and the certification shall be submitted to the Director at least 15 days prior to the event. When the event is one of a series of similar events, such certification may be submitted for the entire series 15 days prior to the first event in the series. If the Director finds that a certification of projected attendance of 50 percent or less of the seating capacity is based on satisfactory evidence such as past attendance at similar events or advance ticket sales, the Director shall, within 15 days of such submittal, notify the facility operator that a reduced parking requirement has been approved, with any conditions deemed appropriate by the Director to ensure adequacy of parking if expected attendance should change. The parking requirement reduction may be applied for

Table A for 23.54.015
Required parking for ((~~non-residential~~)) nonresidential uses other than institutions

Use	Minimum parking required
only if the goals of the facility's Transportation Management Plan are otherwise being met. The Director may revoke or modify a parking requirement reduction approval during a series, if projected attendance is exceeded. [3] For indoor sports and recreation uses that exceed 25,000 square feet in size in a Manufacturing Industrial Center, the minimum requirement is ((~~1~~)) one space for each 2,000 square feet. [4] The amount of required parking is calculated based on the maximum number of staff or animals the center is designed to accommodate. [5] The general minimum requirements of Part I of Table A for 23.54.015 are superseded to the extent that a use, structure, or development qualifies for either a greater or a lesser minimum parking requirement (which may include no requirement) under any other provision. To the extent that a non-residential use fits within more than one line in Table A for 23.54.015, the least of the applicable minimum parking requirements applies. The different parking requirements listed for certain categories of non-residential uses shall not be construed to create separate uses for purposes of any requirements related to establishing or changing a use under this Title 23.	

1

Table B for 23.54.015
Required parking for residential uses

	Use	Minimum parking required
	* * *	
II. Residential use requirements for specific areas		
L.	All residential uses within ((~~urban~~)) regional centers or ((~~within the~~)) Station Area Overlay ((~~District~~)) Districts [2]	No minimum requirement
M.	All residential uses in commercial, RSL, and multifamily zones within urban ((~~villages~~)) centers that are not within ((~~an urban center or the~~)) a Station Area Overlay District, if the residential use is located within a frequent transit service area[2, 4]	No minimum requirement
	* * *	

Footnotes to Table B for 23.54.015
[1] For each moderate-income unit and each low-income unit, no minimum amount of parking is required.
[2] The minimum amount of parking prescribed by Part I of Table B for 23.54.015 does not apply if a use, structure, or development qualifies for a greater or a lesser amount of minimum parking, including no parking, under any other provision of this Section 23.54.015. If more than one provision in this Table B for 23.54.015 is applicable, the provision requiring the least amount of minimum parking applies, except that if item O in Part II of Table B for

Table B for 23.54.015 **Required parking for residential uses**	
Use	**Minimum parking required**
23.54.015 applies, it shall supersede any other requirement in Part I or Part II of this Table B for 23.54.015. [3] No parking is required for single-family residential uses on lots in any residential zone that are less than 3,000 square feet in size or less than 30 feet in width where access to parking is permitted through a required yard or setback abutting a street according to the standards of subsections 23.44.016.B.2, 23.45.536.C.2, or 23.45.536.C.3. [4] Except as provided in Footnote 4, the minimum amounts of parking prescribed by Part 1 of Table B for 23.54.015 apply within 1,320 feet of the Fauntleroy Ferry Terminal.	

* * *

Table C for 23.54.015 **Required parking for public uses and institutions**		
Use		**Minimum parking required**
* * *		
II. General public uses and institutions for specific areas		
Q.	General public uses, institutions and Major Institution uses, except hospitals, in ((~~urban~~)) regional centers or ((~~the~~)) Station Area Overlay ((~~District~~)) Districts [11]	No minimum requirement
R.	General public uses and institutions, except hospitals, including institutes for advanced study in neighborhood residential zones, within urban ((~~villages~~)) centers that are not within ((~~the~~)) Station Area Overlay ((~~District~~)) Districts, if the use is located within a frequent transit service area	No minimum requirement
Footnotes to Table C for 23.54.015 [1] When this use is permitted in a neighborhood residential zone as a conditional use, the Director may modify the parking requirements pursuant to Section 23.44.022; when the use is permitted in a multifamily zone as a conditional use, the Director may modify the parking requirements pursuant to Section 23.45.570. [2] The amount of required parking is calculated based on the maximum number of staff, children, or clients that the center is designed to accommodate on site at any one time. [3] As a Type I decision, the Director, in consultation with the Director of the Seattle Department of Transportation, may allow adult care and child care centers to provide loading and unloading spaces on street, if not prevented by current or planned transportation projects adjacent to their property, when no other alternative exists. [4] A child care facility, when co-located with an assisted living facility, may count the passenger load/unload space required for the assisted living facility toward its required passenger load/unload spaces. [5] When this use is permitted outright in a neighborhood residential or multifamily zone, the		

Table C for 23.54.015
Required parking for public uses and institutions

Use	Minimum parking required
Director may reduce the parking and loading requirements of this Section 23.54.015 and the requirements of Section 23.44.016 or Section 23.45.536 on a case-by-case basis if the applicant can demonstrate that the modification is necessary due to the specific features, activities, or programs of the institution and links the reduction to the features of the institution that justify the reduction. Such modifications shall be valid only under the conditions specified, and if those conditions change, the standard requirement shall be satisfied.	
[6] When family support centers are located within community centers owned and operated by the Department of Parks and Recreation, the Director may lower the combined parking requirement by up to a maximum of 15 percent, pursuant to subsection 23.54.020.I.	
[7] Indoor gymnasiums are not considered ball courts, nor are they considered auditoria or public assembly rooms unless they contain bleachers (fixed seats). If the gymnasium contains bleachers, the parking requirement for the gymnasium is one parking space for every eight fixed seats. Each 20 inches of width of bleachers is counted as one fixed seat for the purposes of determining parking requirements. If the gymnasium does not contain bleachers and is in a school, there is no parking requirement for the gymnasium. If the gymnasium does not contain bleachers and is in a community center, the parking requirement is one space for each 350 square feet.	
[8] When a library is permitted in a multifamily or commercial zone as a conditional use, the Director may modify the parking requirements of this Section 23.54.015 and the requirements of Section 23.45.536 or Sections 23.47A.030 and 23.47A.032 on a case-by-case basis if the applicant can demonstrate that the modification is necessary due to the specific features, activities, or programs of the institution and links the reduction to the features of the institution that justify the reduction. Such modifications shall be valid only under the conditions specified, and if those conditions change, the standard requirement shall be satisfied.	
[9] For public schools, when an auditorium or other place of assembly is demolished and a new one built in its place, parking requirements are determined based on the new construction. When an existing public school on an existing public school site is remodeled, additional parking is required if any auditorium or other place of assembly is expanded or additional fixed seats are added. Additional parking is required as shown in this Table C for 23.54.015 for the increase in floor area or increase in number of seats only. If the parking requirement for the increased area or seating is ((~~10~~)) ten percent or less than that for the existing auditorium or other place of assembly, then no additional parking is required.	
[10] Development standard departures may be granted or required pursuant to the procedures and criteria set forth in Chapter 23.79 to reduce the required or permitted number of parking spaces.	
[11] The general requirements of lines A through P of this Table C for 23.54.015 for general public uses and institutions, and requirements of subsection 23.54.016.B for Major Institution uses, are superseded to the extent that a use, structure, or development qualifies for either a greater or a lesser parking requirement (which may include no requirement) under any other provision. To the extent that a general public use, institution, or Major Institution use fits within more than one line in this Table C for 23.54.015, the least of the applicable parking	

Table C for 23.54.015 Required parking for public uses and institutions	
Use	**Minimum parking required**
requirements applies. The different parking requirements listed for certain categories of general public uses or institutions shall not be construed to create separate uses for purposes of any requirements related to establishing or changing a use under this Title 23. [12] The Director may reduce the minimum parking requirements for a child care center in any zone if a portion of its parking demand can be accommodated in nearby on-street parking.	

* * *

Section 88. Section 23.54.016 of the Seattle Municipal Code, last amended by Ordinance 125558, is amended as follows:

23.54.016 Major Institutions – ((~~parking~~)) <u>Parking</u> and transportation

Except in the MPC-YT zone, Major Institution uses are subject to the following transportation and parking requirements:

A. General ((~~Provisions.~~)) <u>provisions</u>

1. Minimum requirements for parking quantity are established in subsection 23.54.016.B.

2. The maximum number of spaces provided for the Major Institution use shall not exceed 135 percent of the minimum requirement, unless additional spaces are approved through administrative or Council review as provided in subsection 23.54.016.C. For a Major Institution use in ((~~an urban~~)) <u>a regional</u> center or ((~~the~~)) Station Area Overlay District, the maximum limit shall not exceed 135 percent of the minimum parking requirements calculated pursuant to subsection 23.54.016.B.2.

3. Parking requirements for Major Institutions with more than one type of institutional use (for example, a hospital and a university), if applicable, shall be calculated for each use separately, and then added together to derive the total number of required spaces.

4. When a permit application is made for new development at an existing Major Institution and the new development is a hospital or located outside ((~~an urban~~)) a regional center or ((~~the~~)) Station Area Overlay District, parking requirements shall be calculated both for the entire Major Institution and for the proposed new development. If there is a parking deficit for the entire institution, the institution shall make up a portion of the deficit in addition to the quantity required for the new development, according to subsection 23.54.016.B.3. If there is a parking surplus above the maximum allowed number of spaces for the institution as a whole, required amounts of parking for new development will first be applied to the surplus in the required ratio of long-term and short-term spaces. Additional parking shall be permitted only when no surplus remains.

5. When determining parking requirements, individuals fitting into more than one category (for example, a student who is also an employee or a faculty member who is also a doctor) shall not be counted twice. The category requiring the greater number of parking spaces shall be used.

B. Parking ((~~Quantity Required.~~)) quantity required

1. In ((~~urban~~)) regional centers and ((~~the~~)) Station Area Overlay ((~~District~~)) Districts, no parking is required for Major Institution uses, except for hospitals.

2. For all other Major Institutions the minimum number of parking spaces required is as follows:

a. Long-term ((~~Parking.~~)) parking

1) Medical Institutions. A number of spaces equal to 80 percent of hospital-based doctors; plus 25 percent of staff doctors; plus 30 percent of all other employees present at peak hour;

2) Educational Institutions. A number of spaces equal to 15 percent of the maximum students present at peak hour, excluding resident students; plus 30 percent of employees present at peak hour; plus 25 percent of the resident unmarried students; plus one space for each married student apartment unit.

b. Short-term ((~~Parking.~~)) parking

1) Medical Institutions. A number of spaces equal to one space per six beds; plus one space per five average daily outpatients;

2) Educational Institutions. A number of spaces equal to five percent of the maximum students present at peak hour excluding resident students.

c. Additional ((~~Short-term Parking Requirements~~)) short-term parking requirements. When one of the following uses is a Major Institution use, the following additional short-term parking requirements shall be met. Such requirements may be met by joint use of parking areas and facilities if the Director determines that the uses have different hours of operation according to subsection 23.54.020.G:

1) Museum. One space for each 250 square feet of public floor area;

2) Theater, ((~~Auditorium, or Assembly Hall~~)) auditorium, or assembly hall. One space for each 200 square feet of audience assembly area not containing fixed seats, and one space for every ((~~10~~)) ten seats for floor area containing fixed seats;

3) Spectator ((~~Sports Facility Containing Fewer than 20,000 Seats~~)) sports facility containing fewer than 20,000 seats. One space for each ((~~10~~)) ten permanent seats and one space for each 100 square feet of spectator assembly area not containing fixed seats;

4) Spectator ((~~Sports Facility Containing 20,000 or More Seats~~)) sports facility containing 20,000 or more seats. One space for each ((~~10~~)) ten permanent seats and one bus space for each 300 permanent seats.

d. Bicycle ((~~Parking~~)) parking. Bicycle parking meeting the development standards of subsections 23.54.015.K.2 through 23.54.015.K.6 and subsection 23.54.016.D.2 shall be provided in the following quantities:

1) Medical Institutions. A number of spaces equal to two percent of employees, including doctors, present at peak hour;

2) Educational Institutions. A number of spaces equal to ((~~10~~)) ten percent of the maximum students present at peak hour plus five percent of employees.

If at the time of application for a master use permit, the applicant can demonstrate that the bicycle parking requirement is inappropriate for a particular institution because of topography, location, nature of the users of the institution, or other reasons, the Director may modify the bicycle parking requirement.

3. Parking ((~~Deficits~~)) deficits. In addition to providing the minimum required parking for a new structure, five percent of any vehicular or bicycle parking deficit as determined by the minimum requirements of this subsection 23.54.016.B, existing on ((~~the effective date of the ordinance codified in this section~~)) May 2, 1990, shall be supplied before issuance of a certificate of occupancy.

* * *

Section 89. Section 23.54.020 of the Seattle Municipal Code, last amended by Ordinance 126509, is amended as follows:

23.54.020 Parking quantity exceptions

The motor vehicle parking quantity exceptions set forth in this Section 23.54.020 apply in all zones except downtown zones, which are regulated by Section 23.49.019, and Major Institution zones, which are regulated by Section 23.54.016.

* * *

F. Reductions to required parking

1. When parking is required, reductions permitted by this subsection 23.54.020.F will be calculated from the minimum required parking in Section 23.54.015. Total reductions to required parking as provided in this subsection 23.54.020.F may not exceed 50 percent.

2. Transit reduction

a. In multifamily and commercial zones, the minimum required parking for all uses is reduced by 50 percent if the property is located within a frequent transit service area, and the property is not located in ((~~an Urban Center, Urban Village,~~)) a regional center, an urban center, or a Station Area Overlay District.

b. In industrial zones, the minimum parking requirement for a nonresidential use is reduced by 15 percent if the use is located within a frequent transit service area.

3. For new or expanding offices or manufacturing uses that require 40 or more parking spaces, the minimum required parking may be reduced by up to a maximum of 40 percent by the substitution of alternative transportation programs, according to the following provisions:

a. For every carpool space accompanied by a cash fee, performance bond, or alternative guarantee acceptable to the Director, the total required parking will be reduced by 1.9 spaces, up to a maximum of 40 percent of the parking requirement.

b. For every vanpool purchased or leased by the applicant for employee use, or equivalent cash fee for purchase of a van by the public ridesharing agency, the total required parking will be reduced by six spaces, up to a maximum of 20 percent of the parking requirement.

c. If transit or transportation passes are provided with a 50 percent or greater cost reduction to all employees in a proposed structure for the duration of the business establishment(s) within it, or five years, whichever is less, and if transit service is located within one-quarter mile (1,320 feet), the required parking shall be reduced by ((~~10~~)) ten percent. With a 25 percent to 49 percent cost reduction, and if transit service is located within one-quarter mile (1,320 feet), the parking requirement shall be reduced by five percent.

d. For every two covered long-term bicycle parking spaces provided, the total parking requirement shall be reduced by one space, up to a maximum of 20 percent of the parking requirement, provided there is access to an arterial over improved streets.

* * *

Section 90. Section 23.54.035 of the Seattle Municipal Code, last amended by Ordinance 124680, is amended as follows:

23.54.035 Loading berth requirements and space standards

* * *

B. Exception to loading requirements

1. For uses with less than 16,000 square feet of gross floor area that provide a loading space on a street or alley, the loading berth requirements may be waived by the Director if, after review, the Director of the Seattle Department of Transportation finds that the street or alley berth is adequate.

2. Within the Downtown and South Lake Union ((~~Urban~~)) Regional Centers and within the MPC-YT zone, loading berth requirements may be waived or modified if the Director finds, after consultation with and approval by the Director of the Seattle Department of Transportation, that the number of loading berths in Table A for 23.54.035 is not required and that the modified number will be sufficient. The applicant shall submit specific information addressing the following criteria, upon which the Director's determination shall be based:

a. All loading is proposed to occur on-site((~~;~~)) or ((~~b. Loading~~)) any loading that is proposed to occur in a public right-of-way can take place without disrupting pedestrian circulation or vehicular traffic;

((~~c.~~)) b. Additional evidence relating to the size, character, and operation of the building and likely tenancy; and

((~~d.~~)) c. Where loading occurs at a central loading facility, goods can be distributed to other buildings on-site without disrupting pedestrian circulation or vehicular traffic.

* * *

Section 91. Section 23.58A.014 of the Seattle Municipal Code, last amended by Ordinance 126855, is amended as follows:

23.58A.014 Bonus residential floor area for affordable housing

* * *

B. Performance option

* * *

8. Additional standards for off-site performance. If the affordable housing is not provided within the development that includes the bonus residential floor area, it may be provided off-site according to the following standards:

a. Off-site affordable housing must be provided within the South Lake Union ((~~Urban~~)) Regional Center if the development that includes bonus residential floor area is within the South Lake Union ((~~Urban~~)) Regional Center. If the development that includes bonus residential floor area is outside the South Lake Union ((~~Urban~~)) Regional Center, the off-site affordable housing must be in Seattle city limits, in priority order, (1) within the same ((~~urban center or village~~)) regional center or urban center as the development, (2) within ((~~1~~)) one mile of the development, (3) within 0.5 mile of a light rail or bus rapid transit station, or (4) within 0.25 mile of a bus or streetcar stop.

b. The applicant shall provide to the City an irrevocable letter of credit, or other sufficient security approved by the Director of Housing, prior to issuance and as a condition of issuance of any permit after the first building permit for the development that includes the bonus residential floor area and before any permit for any construction activity other than for excavation and shoring for the development is issued, unless completion of the affordable housing has been documented to the satisfaction of the Director of Housing and the affordable housing is subject to recorded restrictions satisfactory to the Director of Housing. The letter of credit or other security shall be in an amount equal to the payment option amount calculated according to provisions in subsection 23.58A.014.C, plus an amount equal to interest on such payment. The Director of Housing is authorized to adopt, by rule, terms and conditions of such security including the amount of security and rate of annual interest, conditions on which

the City shall have a right to draw on the letter of credit or other security, and terms should the City become entitled to realize on any such security.

c. Any failure of the affordable housing to satisfy the requirements of this subsection 23.58A.014.B shall not affect the right to maintain or occupy the bonus residential floor area if the Director of Housing certifies to the Director that either:

1) The applicant has provided the City with a letter of credit or other sufficient security pursuant to subsection 23.58A.014.B.8.b; or

2) There have been recorded one or more agreements or instruments satisfactory to the Director of Housing providing for occupancy and affordability restrictions on affordable housing with the minimum floor area determined under this Section 23.58A.014, all affordable housing has been completed, and the affordable housing is on a different lot from the bonus residential floor area or is in one or more condominium units separate from the bonus residential floor area under condominium documents acceptable to the Director of Housing.

d. Unless and until the Director of Housing shall certify as set forth in subsection 23.58A.014.B.8.c, it shall be a continuing permit condition, whether or not expressly stated, for each development obtaining bonus residential floor area based on the provision of housing to which this Section 23.58A.014 applies, that the affordable housing shall be maintained in compliance with the terms of this Section 23.58A.014 and any applicable provisions of the zone, as documented to the satisfaction of the Director of Housing.

* * *

Section 92. Section 23.58A.024 of the Seattle Municipal Code, last amended by Ordinance 126855, is amended as follows:

23.58A.024 Bonus ((~~non-residential~~)) nonresidential floor area for affordable housing and child care

* * *

B. Performance option for housing

* * *

8. Additional standards for off-site performance. If the affordable housing is not provided within the development that includes the bonus ((~~non-residential~~)) nonresidential floor area, it may be provided off-site according to the following standards:

a. If the development that includes bonus ((~~non-residential~~)) nonresidential floor area is within the South Lake Union ((~~Urban~~)) Regional Center, the off-site affordable housing must be located within the South Lake Union ((~~Urban~~)) Regional Center or within one mile of the development that includes the bonus ((~~non-residential~~)) nonresidential floor area and no more than 0.25 mile from the South Lake Union ((~~Urban~~)) Regional Center boundary. If the development that includes bonus ((~~non-residential~~)) nonresidential floor area is outside of the South Lake Union ((~~Urban~~)) Regional Center, the off-site affordable housing must be in Seattle city limits, in priority order, (1) within the same ((~~urban center or village~~)) regional center or urban center as the development, (2) within one mile of the development, (3) within 0.5 mile of a light rail or bus rapid transit station, or (4) within 0.25 mile of a bus or streetcar stop.

b. The applicant shall provide to the City an irrevocable letter of credit, or other sufficient security approved by the Director of Housing, prior to and as a condition of issuance of any permit after the first building permit for the development that includes bonus

nonresidential floor area and before any permit for construction activity other than excavation and shoring is issued, unless completion of the affordable housing has been documented to the satisfaction of the Director of Housing and the affordable housing is subject to recorded restrictions satisfactory to the Director of Housing. The letter of credit or other security shall be in an amount equal to the payment option amount calculated according to provisions in subsection 23.58A.024.D, plus an amount equal to interest on such payment. The Director of Housing is authorized to adopt, by rule, terms and conditions of such security including the amount of security and rate of annual interest, conditions on which the City shall have a right to draw on the letter of credit or other security, and terms should the City become entitled to realize on any such security.

c. Any failure of the affordable housing to satisfy the requirements of this subsection 23.58A.024.B shall not affect the right to maintain or occupy the bonus nonresidential floor area if the Director of Housing certifies to the Director that either:

1) The applicant has provided the City with a letter of credit or other sufficient security pursuant to subsection 23.58A.024.B.8.b; or

2) There have been recorded one or more agreements or instruments satisfactory to the Director of Housing providing for occupancy and affordability restrictions on affordable housing with the minimum floor area determined under this Section 23.58A.024, all affordable housing has been completed, and the affordable housing is on a different lot from the bonus nonresidential floor area or is in one or more condominium units separate from the bonus nonresidential floor area under condominium documents acceptable to the Director of Housing.

d. Unless and until the Director of Housing certifies as set forth in subsection 23.58A.024.B.8.c, it shall be a continuing permit condition, whether or not expressly stated, for each development obtaining bonus nonresidential floor area based on the provision of housing to which this Section 23.58A.024 applies, that the affordable housing shall be maintained in compliance with the terms of this Section 23.58A.024 and any applicable provisions of the zone, as documented to the satisfaction of the Director of Housing.

* * *

Section 93. Section 23.58A.040 of the Seattle Municipal Code, last amended by Ordinance 125267, is amended as follows:

23.58A.040 Bonus floor area for open space amenities

* * *

C. Performance option

* * *

5. Standards for open space amenities. The following standards apply to open space amenities, except as otherwise specifically stated in the provisions of the zone.

a. Public access

1) Public access for open space amenities in ((~~Downtown~~)) downtown zones is regulated pursuant to subsection 23.58A.040.C.2.

2) Except for green street improvements, open space amenities not in ((~~Downtown~~)) downtown zones shall be open to the public, without charge, each day of the year for a minimum of ten hours each day for a neighborhood open space and for a mid-block corridor in SM-U zones in the University ((~~Community Urban~~)) District Regional Center, and 24 hours each day of the year for a green street setback. The hours of public access identified above

shall be during daylight hours, unless there are insufficient daylight hours, in which case the open space shall also be open during nighttime hours for the balance of the hours the open space is to remain open. Public access may be limited temporarily during hours that are otherwise required to be open to the public for necessary maintenance or for reasons of public safety.

3) Within the open space, property owners, tenants, and their agents shall allow members of the public to engage in activities allowed in the public sidewalk environment, except that those activities that would require a street use permit if conducted on the sidewalk may be excluded or restricted. Free speech activities such as hand billing, signature gathering, and holding signs, all without obstructing access to the space, any building, or other adjacent features, and without unreasonably interfering with the enjoyment of the space by others, shall be allowed. While engaged in allowed activities, members of the public may not be asked to leave for any reason other than conduct that unreasonably interferes with the enjoyment of the space by others unless the space is being closed to the general public consistent with this subsection 23.58A.040.C. No parking, storage, or other use may be established on or above the surface of the open space except as provided in subsection 23.58A.040.C.5.b.2.f. Use by motor vehicles of open space for which bonus floor area is granted is not permitted. The open space shall be identified clearly with the City's public open space logo on a plaque placed at a visible location at each street entrance providing access to the amenity. The plaque shall indicate, in letters legible to passersby, the nature of the bonus amenity, its availability for general public access, and additional directional information as needed.

b. Standards for neighborhood open space

1) Neighborhood open space in ((~~Downtown~~)) downtown zones in South Downtown is regulated pursuant to subsection 23.58A.040.C.2.

2) Neighborhood open space not in ((~~Downtown~~)) downtown zones used to qualify for bonus floor area shall meet the conditions in this subsection 23.58A.040.C.5.b.2, unless a modification is allowed by the Director as a Type I decision, based on the Director's determination that, relative to the strict application of the standards, the exception will result in improved public access and use of the space or a better integration of the space with surrounding development.

a) The open space shall comply with the applicable provisions of this Section 23.58A.040. The open space shall consist of one continuous area with a minimum of 3,000 square feet and a minimum horizontal dimension of 10 feet.

b) A minimum of 35 percent of the open space shall be landscaped with grass, ground cover, bushes, and/or trees.

c) Either permanent or movable seating in an amount equivalent to 1 lineal foot for every 200 square feet of open space shall be available for public use during hours of public access.

d) The open space shall be located and configured to maximize solar exposure to the space, allow easy access from streets or other abutting public spaces, including access for persons with disabilities, and allow convenient pedestrian circulation through all portions of the open space. The open space shall have a minimum frontage of 30 feet at grade abutting a sidewalk, and be visible from sidewalks on at least one street.

e) The open space shall be provided at ground level, except that in order to provide level open spaces on steep lots, some separation of multiple levels may be allowed, provided they are physically and visually connected and accessible to persons with disabilities.

f) Up to 20 percent of the open space may be covered by elements accessory to public use of the open space, including: permanent, freestanding structures, such as retail kiosks, pavilions, or pedestrian shelters; structural overhangs; overhead arcades or other forms of overhead weather protection; and any other features approved by the Director that contribute to pedestrian comfort and active use of the space. The following elements within the open space area may count as open space and are not subject to the percentage coverage limit: temporary kiosks and pavilions, public art, permanent seating that is not reserved for any commercial use, exterior stairs and mechanical assists that provide access to public areas and are available for public use, and any similar features approved by the Director. Seating or tables, or both, may be provided and reserved for customers of restaurants or other uses abutting the open space, but the area reserved for customer seating shall not exceed 15 percent of the open space area or 500 square feet, whichever is less.

c. Standards for green street setbacks

1) Green street setbacks in ((~~Downtown~~)) downtown zones in South Downtown are regulated pursuant to subsection 23.58A.040.C.2.

2) Green street setbacks in ((~~Downtown~~)) downtown zones outside South Downtown are regulated pursuant to Section 23.49.013.

3) Green street setbacks not in ((~~Downtown~~)) downtown zones shall meet the following standards:

a) Where permitted by the provisions of the zone, bonus floor area may be gained for green street setbacks by development on lots abutting those street segments that are listed or shown as green streets in the provisions of the zone.

b) A green street setback shall be provided as a setback from a lot line abutting a designated green street. The setback shall be continuous for the length of the frontage of the lot abutting the green street, and a minimum of 50 percent of the setback area shall be landscaped. The area of any driveways in the setback area is not included in the bonusable area. For area eligible for a bonus, the average setback from the abutting green street lot line shall not exceed 10 feet, with a maximum setback of 15 feet. The design of the setback area shall allow for public access, such as access to street-level uses in abutting structures or access to areas for seating. The Director may approve a modification to the standards in this subsection 23.58A.040.C.5.c.3.b as a Type I decision, based on the Director's determination that the modification is consistent with a green street concept plan, if one exists, established in accordance with Director's Rule 11-2007, or a successor rule.

d. Standards for green street improvement. Green street improvements used to qualify for bonus floor area shall be located on a designated green street and shall meet the standards of a city-approved streetscape concept plan or other design document approved by the Director.

e. Standards for mid-block corridor

1) Mid-block corridors used to qualify for bonus floor area in ((~~Downtown~~)) downtown zones in South Downtown are regulated pursuant to subsection 23.58A.040.C.2.

2) Mid-block corridors used to qualify for bonus floor area in the Mount Baker Station Area must meet the requirements in the Downtown Amenity Standards.

3) Mid-block corridors used to qualify for bonus floor area in the SM-U zones within the University ((~~Community Urban~~)) District Regional Center shall meet the

applicable requirements of this subsection 23.58A.040.C and the requirements of subsection 23.48.640.E.

f. Standards for hillside terraces. A hillside terrace used to qualify for bonus floor area in South Lake Union ((~~Urban~~)) Regional Center or in ((~~Downtown~~)) downtown zones in South Downtown is regulated pursuant to subsection 23.58A.040.C.2.

g. Declaration. If open space is to be provided for purposes of obtaining bonus floor area, the owners of the lot using the bonus floor area, and of the lot where the open space is provided, if different, shall execute and record a declaration and voluntary agreement in a form acceptable to the Director identifying the bonus amenities; acknowledging that the right to develop and occupy a portion of the gross floor area on the lot using the bonus floor area is based upon the long-term provision and maintenance of the open space and that development is restricted in the open space; and committing to provide and maintain the open space.

h. Identification

1) Open space amenities in ((~~Downtown~~)) downtown zones in South Downtown shall meet the identification conditions of the Downtown Amenity Standards.

2) Open space amenities not in ((~~Downtown~~)) downtown zones shall be identified clearly with the City's public open space logo on a plaque placed at a visible location at each street entrance providing access to the amenity. The plaque shall indicate, in letters legible to passersby, the nature of the bonus amenity, its availability for general public access, and additional directional information as needed.

i. Duration; alteration. Except as provided for in this subsection 23.58A.040.C.5.i, the owners of the lot using the bonus floor area and of the lot where the open space amenity is located, if different, including all successors, shall provide and maintain the

open space amenities for which bonus floor area is granted, in accordance with the applicable provisions of this Section 23.58A.040, for as long as the bonus floor area gained by the open space amenities exists. An open space amenity for which bonus floor area has been granted may be altered or removed only to the extent that either or both of the following occur, and alteration or removal may be further restricted by the provisions of the zone and by conditions of any applicable permit:

1) The bonus floor area permitted in return for the specific open space amenity is removed or converted to a use for which bonus floor area is not required under the provisions of the zone; or

2) An amount of bonus floor area equal to that allowed for the open space amenity that is to be altered or removed is provided through alternative means consistent with the provisions of the zone and provisions for allowing bonus floor area in this Chapter 23.58A.

* * *

Section 94. Section 23.58A.042 of the Seattle Municipal Code, last amended by Ordinance 126855, is amended as follows:

23.58A.042 Transferable development potential (TDP) and rights (TDR)

* * *

F. Standards for vulnerable masonry structure TDR or TDP sending lots. Within the portion of the University ((~~Community Urban~~)) District Regional Center west of 15th Avenue NE or within the Uptown ((~~Urban~~)) Regional Center, TDR and TDP may be transferred from lots that comply with the following conditions:

1. The sending lot is located in the University ((~~Community Urban~~)) District Regional Center west of 15th Avenue NE and is in an SM-U, NC3, or NC3P zone with a mapped height limit of 55 feet or greater, or is located in the Uptown ((~~Urban~~)) Regional Center and is in an SM-UP, MR, LR3, or C2 zone;

2. The lot includes a structure that contributes to the historic architectural context of the neighborhood and is identified as such in the Department of Neighborhoods' (DON) Historic Resource Survey, and is also identified on a list of structures meeting specific criteria in a rule promulgated by the Director according to Section 23.48.627; and

3. The qualifying structure on the sending lot shall be retained as follows for a minimum of 50 years:

a. The structure is rehabilitated and maintained to comply with all codes applicable to seismic retrofitting of vulnerable masonry structures;

b. All exterior facades shall be retained; except that portions of a new structure may abut facades that are not street-facing facades or that set back a minimum of 30 feet from a street lot line that is generally parallel to the facade, and connections between the new structure and the facades of the retained structure are allowed; and

c. Additions or alterations to the structure that extend the useful physical life or economic viability of the structure are permitted, provided that:

1) The additions do not significantly alter the original structural system or result in significant alterations to any historic or architectural characteristics of the exterior appearance of the structure as documented in the DON Historic Resource Survey, except as may be required to comply with applicable codes; and

2) The total floor area of any additions to the original structure, excluding floor area added to reclaim floor area that may have been removed from the original structure over time, does not exceed one story in height and the equivalent of 0.5 FAR, as calculated on the lot on which the structure was originally permitted.

4. If development rights from a lot certified by the ((~~Department~~)) Director of the Seattle Department of Construction and Inspections as a vulnerable masonry structure sending site have not been sold within three years of certification, the lot must be recertified by the Director to determine if the structure continues to qualify as an eligible sending site; and

5. For transfers of vulnerable masonry structure TDR and TDP, the owner of the sending lot shall execute and record an agreement with the City, with the written consent of all holders of encumbrances on the sending lot, unless such consent is waived by the Director for good cause, that provides for the maintenance of the required structure on the sending lot for a minimum of 50 years. Such agreement shall commit to limits on additions and modifications to the structure consistent with the provisions of this subsection 23.58A.042.F and that are approved by the Director.

* * *

Section 95. Section 23.58B.040 of the Seattle Municipal Code, last amended by Ordinance 126862, is amended as follows:

23.58B.040 Mitigation of impacts – Payment option

* * *

B. Deposit and use of cash contributions

1. Cash contributions shall be deposited by the Director of Housing in a special account established solely for preservation and production of housing affordable for renter

households with incomes no higher than 60 percent of median income and for owner households with incomes no higher than 80 percent of median income. Earnings on balances in the special account shall accrue to that account.

2. Use of cash contributions shall support the preservation and production of renter-occupied housing within Seattle, or the preservation and production of ownership housing within Seattle, as follows. Rental housing supported by the cash contributions shall be rent- and income-restricted to serve households with incomes no higher than 60 percent of median income for a minimum period of 50 years, with an expectation of ongoing affordability. At least five percent of total cash contributions on a yearly basis shall be dedicated to capital expenditures for development of ownership housing. Ownership housing supported by the cash contributions shall be priced to serve and sold to households with incomes no higher than 80 percent of median income, with resale restrictions for a minimum period of 50 years, with an expectation of ongoing affordability.

3. For purposes of determining the location for use of cash contributions, the City shall consider the extent to which the housing advances the following factors:

a. Affirmatively furthering fair housing choice;

b. Locating within ((~~an urban center or urban village~~)) a regional center or an urban center;

c. Locating in proximity to frequent bus service or current or planned light rail or streetcar stops;

d. Furthering City policies to promote economic opportunity and community development and addressing the needs of communities vulnerable to displacement; and

e. Locating near developments that generate cash contributions.

4. Each cash contribution shall be expended within five years of collection. Any cash contribution not so expended shall be refunded with any interest required by law.

Section 96. Section 23.58B.050 of the Seattle Municipal Code, last amended by Ordinance 126862, is amended as follows:

23.58B.050 Mitigation of impacts – Performance option

* * *

C. Additional performance standards. In addition to meeting the standards in subsection 23.58B.050.B, MHA-C units located on a site other than the same lot as the development required to mitigate affordable housing impacts according to this Chapter 23.58B shall meet the following additional standards:

1. Equal or better mitigation. The applicant shall demonstrate to the satisfaction of the Director of Housing that affordable housing impact mitigation provided through the performance option on a site other than the same lot as the development required to mitigate affordable housing impacts according to this Chapter 23.58B is equal to or better than mitigation provided through performance on the same lot.

2. Location. MHA-C units provided on a site other than the same lot as the development required to mitigate affordable housing impacts according to this Chapter 23.58B shall be located:

a. Within the same ((~~urban center or urban village~~)) regional center or urban center as the development required to mitigate affordable housing impacts according to this Chapter 23.58B; or

b. Within one mile of the development required to mitigate affordable housing impacts according to this Chapter 23.58B if such development is located outside of ((~~an urban center or urban village~~)) a regional center or an urban center.

3. Developer's agreement. If the owner of the development required to mitigate affordable housing impacts according to this Chapter 23.58B is not the owner of the MHA-C units, then in addition to the agreement required according to subsection 23.58B.050.B.17, the owner of the development required to mitigate affordable housing impacts according to this Chapter 23.58B and the owner of the MHA-C units shall execute a developer's agreement, acceptable to the Director of Housing, allowing the exclusive use of the MHA-C units to satisfy the requirements of this Chapter 23.58B in return for necessary and adequate financial support to the development of the MHA-C units.

4. Letter of credit

a. If the MHA-C units are located on a site other than the same lot as the development required to mitigate affordable housing impacts according to this Chapter 23.58B, the owner of the development required to mitigate affordable housing impacts according to this Chapter 23.58B shall provide to the Director of Housing an irrevocable bank letter of credit, approved by the Director of Housing, in the amount according to subsection 23.58B.040.A.

b. The Director of Housing may draw on the letter of credit one year after the date of issuance of the certificate of occupancy, or, if a certificate of occupancy is not required, the final building permit inspection, for the development required to mitigate affordable housing impacts according to this Chapter 23.58B if the certificate of occupancy or final building permit inspection for the MHA-C units has not been issued on or before that date. The owner of the development required to mitigate affordable housing impacts according to this Chapter

23.58B shall also pay an amount equal to the interest on the cash contribution, at the rate equal to the prime rate quoted by Bank of America, or its successor, plus three percent per annum, from the date of issuance of the first building permit that includes the structural frame for the development required to mitigate affordable housing impacts according to this Chapter 23.58B.

c. If and when the City becomes entitled to draw on any letter of credit, the Director of Housing may take appropriate steps to do so, and the amounts realized, net of any costs to the City, shall be used in the same manner as cash contributions according to subsection 23.58B.040.B.

Section 97. Section 23.58C.040 of the Seattle Municipal Code, last amended by Ordinance 126855, is amended as follows:

23.58C.040 Affordable housing – Payment option

* * *

B. Use of cash contributions

1. The Director of Housing shall be authorized to accept all cash contributions on behalf of the City. Cash contributions shall be deposited by the Director of Housing in a special account and shall be used for purposes authorized by RCW 36.70A.540. Earnings on balances in the special account shall accrue to that account. At least five percent of total cash contributions on a yearly basis shall be dedicated to support ownership housing.

2. Income levels

a. Rental housing supported by cash contributions shall be rent- and income-restricted to serve households with incomes no greater than 60 percent of median income for a minimum period of 50 years, with an expectation of ongoing affordability.

b. Ownership housing supported by cash contributions shall be priced to serve and sold to households with incomes no greater than 80 percent of median income for a minimum period of 50 years, with an expectation of ongoing affordability.

3. Location. For purposes of determining the location for use of cash contributions, the City shall consider the extent to which the housing supported by cash contributions advances the following factors:

a. Affirmatively furthering fair housing choice;

b. Locating within ((~~an urban center or urban village~~)) a regional center or urban center;

c. Locating in proximity to frequent bus service or current or planned light rail or streetcar stops;

d. Furthering City policies to promote economic opportunity and community development and addressing the needs of communities vulnerable to displacement; and

e. Locating near developments that generate cash contributions.

Section 98. Section 23.58C.050 of the Seattle Municipal Code, last amended by Ordinance 126855, is amended as follows:

23.58C.050 Affordable housing – Performance option

* * *

C. Performance requirements. MHA-R units provided to comply with this Chapter 23.58C through the performance option shall meet the following requirements:

* * *

8. Additional requirements for MHA-R units provided through the performance option on a site other than the same lot as the development required to comply with this Chapter 23.58C

a. Equal or better - comparability of units. The applicant shall demonstrate to the satisfaction of the Director of Housing that MHA-R units on a site other than the same lot as the development required to comply with this Chapter 23.58C are equal to or better than MHA-R units on the same lot.

b. Location. MHA-R units on a site other than the same lot as the development required to comply with this Chapter 23.58C shall be located in a Lowrise or RSL zone. In addition, units shall be located:

1) Within the same ((~~urban center or urban village~~)) regional center or urban center as the development required to comply with this Chapter 23.58C; or

2) Within 1 mile of the development required to comply with this Chapter 23.58C if such development is located outside of ((~~an urban center or urban village~~)) a regional center or urban center.

c. Tenure. MHA-R units on a site other than the same lot as the development required to comply with this Chapter 23.58C shall be ownership units and shall comply with all additional requirements for ownership units according to subsection 23.58C.050.C.7.

d. Public subsidy. If any public subsidy is used for a development, and the public subsidy operates through subjecting units in the development to restrictions on the income levels of occupants and the rents or sale prices that may be charged, the development shall not be

eligible to provide units through the performance option according to this subsection 23.58C.050.C.8.

e. Developer's agreement. If the owner of the development required to comply with this Chapter 23.58C is not the owner of the MHA-R units, then in addition to the agreement required according to subsection 23.58C.050.E, the owner of the development required to comply with this Chapter 23.58C and the owner of the MHA-R units shall execute a developer's agreement, acceptable to the Director of Housing, allowing the exclusive use of the MHA-R units to satisfy the requirements of this Chapter 23.58C in return for necessary and adequate financial support to the development of those MHA-R units.

f. Letter of credit

1) If the MHA-R units are located on a site other than the same lot as the development required to comply with this Chapter 23.58C, the owner of the development required to comply with this Chapter 23.58C shall provide to the Director of Housing an irrevocable bank letter of credit, approved by the Director of Housing, in the amount according to subsection 23.58C.040.A.

2) The Director of Housing may draw on the letter of credit one year after the date of issuance of the certificate of occupancy, or, if a certificate of occupancy is not required, the final building permit inspection, for the development required to comply with this Chapter 23.58C if the certificate of occupancy or final building permit inspection for the MHA-R units has not been issued on or before that date. The owner of the development required to comply with this Chapter 23.58C shall also pay an amount equal to the interest on the cash contribution, at the rate equal to the prime rate quoted by Bank of America, or its successor, plus

three percent per annum, from the date of issuance of the first building permit that includes the structural frame for the development required to comply with this Chapter 23.58C.

3) If and when the City becomes entitled to draw on any letter of credit, the Director of Housing may take appropriate steps to do so, and the amounts realized, net of any costs to the City, shall be used in the same manner as cash contributions according to subsection 23.58C.040.B.

* * *

Section 99. Section 23.69.022 of the Seattle Municipal Code, last amended by Ordinance 126864, is amended as follows:

23.69.022 Uses permitted within 2,500 feet of a Major Institution Overlay District

A. A Major Institution shall be permitted to lease space, or otherwise locate a use outside a Major Institution Overlay (MIO) District, and within 2,500 feet of the MIO District boundary, subject to the following limitations:

1. The provisions of this Section 23.69.022 shall not apply to contractual arrangements with other entities, except for leases or other agreements for occupying space.

2. No such use shall be allowed at street level in a commercial zone, unless the use is determined to be similar to a general sales and service use, eating and drinking establishment, major durables retail sales, entertainment use, or child care center and is allowed in the zone. If the use is allowed in the zone but is determined not to be similar to a general sales and service use, eating and drinking establishment, major durables retail sales, entertainment use, or child care center, the Director may not allow the use at street level in a commercial zone unless provided otherwise in an adopted master plan or in a Council-approved ((~~neighborhood~~)) subarea plan;

3. Except as permitted in an adopted master plan, the use shall not result in the demolition of a structure(s) that contains a residential use nor shall it change a residential use to a nonresidential use.

4. The use(s) shall conform to the use and development standards of the applicable zone.

5. The use shall be included in the Major Institution's approved Transportation Management Program if it contains students or employees of the Major Institution.

6. If a Master Use Permit is required for the use, the Director shall notify the Advisory Committee of the pending permit application and the committee shall be given the opportunity to comment on the impacts of the proposed use.

* * *

C. A Major Institution that leases space or otherwise locates a use in a ((~~Downtown~~)) downtown zone shall not be subject to the limitations established in subsection 23.69.022.A or 23.69.022.B with respect to that space or use, except that subsections 23.69.022.A.3 and 23.69.022.A.4 shall apply.

* * *

Section 100. Section 23.69.026 of the Seattle Municipal Code, last amended by Ordinance 126626, is amended as follows:

23.69.026 Determination to prepare a master plan

* * *

C. A Major Institution with an adopted master plan that is not subject to subsection 23.69.026.B shall be required to prepare a new master plan in the following circumstances:

1. The Major Institution proposes to increase the total amount of gross floor area allowed or the total number of parking spaces allowed within the MIO District, except if a proposed change to a master plan involves:

a. Construction of a one-time single development per master plan period owned or affiliated with an educational ((~~major institution~~)) Major Institution that is part of the Washington State Community and Technical Colleges system; and

b. A property located within ((~~an Urban Center~~)) a regional center; and

c. A development that includes residential uses not exceeding 550 sleeping rooms, composed of dormitory, congregate housing, or other housing opportunities for students or employees of the Major Institution; or

2. A master plan has been in effect for at least ten years and the institution proposes to expand the MIO District boundaries; or

3. A master plan has been in effect for at least ten years and the institution proposes an amendment to the master plan that is determined to be major according to the provisions of Section 23.69.035, and the Director determines that conditions have changed significantly in the neighborhood surrounding the Major Institution since the master plan was adopted.

* * *

Section 101. Section 23.69.035 of the Seattle Municipal Code, last amended by Ordinance 126626, is amended as follows:

23.69.035 Changes to master plan

* * *

D. Minor ((~~Amendments~~)) amendments. A proposed change to an adopted master plan shall be considered and approved as a minor amendment when it is not an exempt change according to subsection 23.69.035.B, when it is consistent with the original intent of the adopted master plan (except as provided in this subsection ((~~23.69.035.D.4~~)) 23.69.035.D), and when it meets at least one of the following criteria:

1. The amendment will not result in significantly greater impacts than those contemplated in the adopted master plan; or

2. The amendment is a waiver from a development standard or master plan condition, or a change in the location or decrease in size of designated open space, and the proposal does not go beyond the minimum necessary to afford relief and will not be materially detrimental to the public welfare or injurious to the property or improvements in the vicinity in which the Major Institution is located; or

3. The amendment is a proposal by the Major Institution to lease space or otherwise locate a use at street level in a commercial zone outside an MIO District, and within 2,500 feet of the MIO District boundary, and the use is allowed in the zone but not permitted pursuant to Section 23.69.022. In making the determination whether the amendment is minor, the Director shall consider the following factors:

a. Whether an adequate supply of commercially zoned land for business serving neighborhood residents will continue to exist, and

b. Whether the use will maintain or enhance the viability or long-term potential of the neighborhood-serving character of the area, and

c. Whether the use will displace existing neighborhood-serving commercial uses at street level or disrupt a continuous commercial street front, particularly of personal and household retail sales and service uses, and

d. ((~~Whether~~)) If the area is located in a regional center with an adopted subarea plan, whether the use supports ((~~neighborhood planning~~)) goals and objectives ((~~as provided in a Council-approved neighborhood~~)) in the regional center subarea plan.

4. The amendment would accommodate a single development with residential uses composed of housing for students or employees of the Major Institution, that is consistent with criteria in subsection 23.69.026.C.1, and that either was not anticipated by or is in excess of what was anticipated in an adopted master plan. This kind of amendment could occur only one time per the lifetime of an adopted master plan. The floor area of said residential use, uses accessory thereto, and ((~~non-residential~~)) nonresidential uses such as required street-level uses shall be exempted from the calculation of total development capacity of the ((~~major institution~~)) Major Institution overlay, and shall be excluded from calculation of Floor Area Ratio and not counted against the Major Institution's development program permitted floor area for the campus.

E. Major ((~~Amendments~~)) amendments. A proposed change to an adopted master plan shall be considered a major amendment when it is not an exempt change according to subsection 23.69.035.B or a minor amendment according to subsection 23.69.035.D. In addition, any of the following shall be considered a major amendment:

1. An increase in a height designation or the expansion of the boundary of the MIO District; or

2. Any change to a development standard that is less restrictive, except if a proposed change relates to providing housing affiliated with certain educational ((~~major institutions~~)) Major Institutions as identified in subsection 23.69.026.C.1; or

3. A reduction in housing stock outside the boundary but within 2,500 feet of the MIO District, other than within a ((~~Downtown~~)) downtown zone, that exceeds the level approved in an adopted master plan; or

4. A change to the single-occupancy vehicle goal of an approved transportation management program that increases the percentage of people traveling by single-occupancy vehicle; or

5. A use that requires Council Conditional Use approval, including but not limited to a helistop or a major communication utility, that was not described in an adopted master plan; or

6. The update of an entire development program component of a master plan that was adopted under Land Use Code provisions prior to ((~~the 1996 Major Institutions~~)) Ordinance 118362 where the institution proposes an increase to the total amount of gross floor area allowed or the total number of parking spaces allowed under the institution's existing development program component within the MIO District. Changes to a development program relating to an action described in subsection 23.69.035.D.4 shall not be considered a development program update of this kind.

* * *

Section 102. Section 23.71.020 of the Seattle Municipal Code, last amended by Ordinance 121362, is amended as follows:

23.71.020 Development Agreements((.))

Development Agreements may be proposed for development within the Northgate Overlay District pursuant to chapter 36.70B RCW ((~~36.70B~~)). In determining whether to approve a Development Agreement, the ((~~City~~)) Council shall consider the extent to which the proposed development or redevelopment:

((~~a.~~)) A. Contributes toward meeting the Northgate ((~~Urban~~)) Regional Center housing targets;

((~~b.~~)) B. Coordinates approaches to transportation planning and traffic analysis with surrounding properties and the City, with the goal of reducing use of single-occupant vehicles and reducing or minimizing pedestrian and vehicular conflicts and other potential negative traffic impacts on neighborhoods;

((~~c.~~)) C. Proposes improvements to the street-level environment and circulation for pedestrians, including coordination with area-wide pedestrian circulation and open space plans such as the ((~~5 th~~)) 5th Avenue Streetscape Design Plan;

((~~d.~~)) D. Includes natural drainage strategies such as those described in the Thornton Creek Five-Year Action Agenda and "Refining Our Choices" for Northgate; and

((~~e.~~)) E. Incorporates sustainable design and green building practices in the proposed development.

Section 103. Section 23.74.002 of the Seattle Municipal Code, last amended by Ordinance 126862, is amended as follows:

23.74.002 Purpose, intent, and description of the ((~~overlay district~~)) Overlay District—Rezone requirement—Rezone criteria

A. Purpose and intent. The purpose of this Chapter 23.74 is to implement the City's Comprehensive Plan, including the ((~~neighborhood~~)) subarea plan for the Greater Duwamish

Manufacturing((/)) and Industrial Center, by establishing a Stadium Transition Area Overlay District for the area shown on Map A for 23.74.004. The Stadium Transition Area centers on large sports facilities and allows uses complementary to them. It is intended to contribute to a safer pedestrian environment for those attending events and permits a mix of uses, supporting the pedestrian-oriented character of the area as well as the surrounding industrial zone, while minimizing conflicts with industrial uses. Within the ((~~overlay district~~)) Overlay District, use provisions and development standards are designed to: create a pedestrian connection with downtown; discourage encroachment on nearby industrial uses to the south; and create a pedestrian-friendly streetscape. Allowing a mix of uses, including office development, restaurants, lodging, and maker uses and arts, is intended to encourage redevelopment and to maintain the health and vibrancy of the area during times when the sports facilities are not in operation.

* * *

Section 104. Section 23.84A.025 of the Seattle Municipal Code, last amended by Ordinance 127099, is amended as follows:

23.84A.025 "M"

* * *

"Mid-block corridor" means an amenity feature that provides open space and publicly accessible connections across extremely long blocks to mitigate transportation impacts of new development by improving pedestrian circulation in high-density areas, including but not limited to the South Lake Union ((~~Urban~~)) Regional Center, the University ((~~Community Urban~~)) District Regional Center west of 15th Avenue NE, the Uptown ((~~Urban~~)) Regional Center, the

Northgate ((~~Urban~~)) Regional Center, and the Downtown ((~~Urban~~)) Regional Center east of Interstate 5.

* * *

Section 105. Section 23.84A.026 of the Seattle Municipal Code, enacted by Ordinance 122311, is amended as follows:

23.84A.026 "N"

* * *

"Neighborhood center" means an area designated as a neighborhood center in the Seattle Comprehensive Plan.

((~~"Neighborhood plan" means the goals and policies adopted by the Council into the Comprehensive Plan's Neighborhood Planning Element, that are developed to guide the growth and development of a specific neighborhood and deal with other neighborhood related issues such as housing, institutions, transportation, economic development and other community development activities.~~))

* * *

Section 106. Section 23.84A.032 of the Seattle Municipal Code, last amended by the Ordinance introduced as Council Bill 120969, is amended as follows:

23.84A.032 "R"

* * *

"Recycling." See "Utility."

"Regional center" means an area designated as a regional center in the Seattle Comprehensive Plan.

* * *

"Rural development credit" means the allowance of floor area on a receiving lot that results from the transfer of development potential from rural unincorporated King County to the Downtown ((~~Urban~~)) Regional Center pursuant to King County Code ((~~Chapter~~)) chapter 21A.55 or successor provisions and pursuant to the provisions of Section 23.49.011.

Section 107. Section 23.84A.038 of the Seattle Municipal Code, last amended by Ordinance 127099, is amended as follows:

23.84A.038 "T"

* * *

"TDR site, housing" means a lot meeting the following requirements:

1. The lot is located in any ((~~Downtown~~)) downtown zone except PMM, DH-1, and DH-2 zones, or is located in the South Lake Union ((~~Urban~~)) Regional Center in any SM zone with a height limit of 85 feet or higher;

2. Each structure on the lot has a minimum of 50 percent of total gross above-grade floor area as dwelling units or congregate residence sleeping rooms committed as restricted units affordable to and occupied by households with annual incomes no higher than 80 percent of median income for a minimum of 50 years;

3. The lot has above-grade gross floor area equivalent to at least 1 FAR as dwelling units or congregate residence sleeping rooms committed as restricted units affordable to and occupied by households with annual incomes no higher than 50 percent of median income for a minimum of 50 years;

4. The dwelling units or congregate residence sleeping rooms according to subsections 2 and 3 of this definition is in one or more structures existing as of July 27, 2001, and the floor area was in residential use as of that date; and

5. The housing TDR site requirements are memorialized in a recorded agreement between the owner of the housing and the Director of Housing.

* * *

Section 108. Section 23.84A.040 of the Seattle Municipal Code, last amended by Ordinance 126862, is amended as follows:

23.84A.040 "U"

* * *

((~~"Urban village" means an area designated in Seattle's Comprehensive Plan as an urban center, hub urban village or residential urban village.~~

~~"Urban village, hub" means an area designated in Seattle's Comprehensive Plan as a hub urban village.~~

~~"Urban village, residential" means an area designated in Seattle's Comprehensive Plan as a residential urban village.~~))

* * *

Section 109. Section 23.84A.042 of the Seattle Municipal Code, last amended by Ordinance 125432, is amended as follows:

23.84A.042 "V"

* * *

"Vulnerable masonry structure" means a structure in specified zones within the University ((~~Community Urban~~)) District Regional Center west of 15th Avenue NE or within the Uptown ((~~Urban~~)) Regional Center that is identified in a Director's rule because it meets criteria for being included on the list of unreinforced masonry structures (URM) identified by ((~~Seattle~~))

SDCI and is also identified in the Department of Neighborhoods' Historic Resource Survey as a structure likely to qualify for nomination as a Seattle Landmark.

Section 110. Section 23.86.006 of the Seattle Municipal Code, last amended by Ordinance 126685, is amended as follows:

23.86.006 Structure height measurement

* * *

B. Within the South Lake Union ((~~Urban~~)) Regional Center, at the applicant's option, structure height shall be measured either as provided for in subsection 23.86.006.A, 23.86.006.E, or under provisions of this subsection 23.86.006.B. Structure height shall be measured for all portions of the structure. All measurements shall be taken vertically from existing or finished grade, whichever is lower, to the highest point of the structure located directly above each point of measurement. Existing or finished grade shall be established by drawing straight lines between the corresponding elevations at the perimeter of the structure. The straight lines will be existing or finished grade for the purpose of height measurement. When a contour line crosses a facade more than once, that contour line will be disregarded when establishing existing or finished grade.

* * *

E. Height measurement techniques in downtown zones and in the South Lake Union ((~~Urban~~)) Regional Center

1. Determine the major street lot line, which shall be the lot's longest street lot line. When the lot has two or more street lot lines of equal length, the applicant shall choose the major street lot line.

2. Determine the slope of the lot along the entire length of the major street lot line.

3. The maximum height shall be measured as follows:

a. When the slope of the major street lot line is less than or equal to 7.5 percent, the elevation of maximum height shall be determined by adding the maximum permitted height to the existing grade elevation at the midpoint of the major street lot line. On a through-lot, the elevation of maximum height shall apply only to the half of the lot nearest the major street lot line. On the other half of a through-lot, the elevation of maximum height shall be determined by the above method using the street lot line opposite and parallel to the major street lot line as depicted in Exhibit B for 23.86.006.

b. When the slope of the major street lot line exceeds 7.5 percent, the major street lot line shall be divided into four or fewer equal segments no longer than 120 feet in length. The elevation of maximum height shall be determined by adding the maximum permitted height to the existing grade elevation at the midpoint of each segment. On a through-lot, the elevation of maximum height shall apply only to the half of the lot nearest the major street lot line. On the other half of a through-lot, the elevation of maximum height shall be determined by the above method using the street lot line opposite and parallel to the major street lot line, as depicted in Exhibit C for 23.86.006.

c. For lots with more than one street frontage, where there is no street lot line that is essentially parallel to the major street lot line, when a measurement has been made for the portion of the block containing the major street lot line, the next measurement shall be taken from the remaining street lot line that is opposite and most distant from the major street lot line.

* * *

Section 111. Section 25.05.164 of the Seattle Municipal Code, last amended by Ordinance 124843, is amended as follows:

25.05.164 Planned actions—Definitions and criteria

Under the authority of RCW 43.21C.440, the City Council may adopt ordinances designating planned actions. A planned action means one or more types of project action that:

* * *

B. Have had the significant environmental impacts adequately addressed in an EIS prepared in conjunction with:

1. A subarea ((~~or neighborhood~~)) plan adopted under chapter 36.70A RCW, or

2. A master planned development or phased project((~~.~~)) ;

* * *

Section 112. Section 25.05.665 of the Seattle Municipal Code, last amended by Ordinance 118012, is amended as follows:

25.05.665 SEPA policies—Overview

* * *

C. Relationship to ((~~neighborhood and business district~~)) subarea plans for regional centers and manufacturing and industrial centers. ((~~Neighborhood and business district~~)) Subarea plans ((~~which~~)) for regional centers and manufacturing and industrial centers that have been adopted by the City Council may serve as the basis for exercising substantive SEPA authority, subject to the following:

1. ((~~New plans.~~)) A plan ((~~approved subsequent July 11, 1988~~)) may serve as the basis of exercising substantive SEPA authority only to the extent that the provisions of the plan explicitly identify any of its elements intended to have application for SEPA purposes.

((~~2. Existing Plans. A plan existing prior to July 11, 1988 may be used as a basis for the exercise of substantive SEPA authority only to the extent that:~~

~~a. The plan identifies unusual circumstances such as substantially different site size or shape, topography, or inadequate infrastructure which would result in adverse environmental impacts which substantially exceed those anticipated by the code or zoning, or~~

~~b. The plan establishes a different balance of environmental and other goals than is characteristic of the Land Use Code as a whole;~~

~~Provided that the authority and conditions based upon an existing plan do not exceed the limitations contained in the cumulative effects policy and the specific environmental policies contained in Sections 25.05.670 and 25.05.675, respectively; and~~

~~3. All plans.~~)) 2. SEPA conditions based upon a ((~~neighborhood or business district~~)) subarea plan for a regional center or manufacturing and industrial center shall be consistent with any rezone action taken by the City Council subsequent to the adoption of the plan.

* * *

Section 113. Section 25.05.800 of the Seattle Municipal Code, last amended by Ordinance 126843, is amended as follows:

25.05.800 Categorical exemptions

The proposed actions contained in this Section 25.05.800 are categorically exempt from threshold determination and environmental impact statement requirements, subject to the rules and limitations on categorical exemptions contained in Section 25.05.305.

A. Minor new construction; flexible thresholds

1. The exemptions in this subsection 25.05.800.A apply to all licenses required to undertake the construction in question. To be exempt under this Section 25.05.800, the project shall be equal to or smaller than the exempt level. For a specific proposal, the exempt level in subsection 25.05.800.A.2 shall control. If the proposal is located in more than one city or county, the lower of the agencies' adopted levels shall control, regardless of which agency is the lead agency. The exemptions in this subsection 25.05.800.A apply except when the project:

a. Is undertaken wholly or partly on lands covered by water;

b. Requires a license governing discharges to water that is not exempt under RCW 43.21C.038;

c. Requires a license governing emissions to air that is not exempt under RCW 43.21C.0381 or WAC 197-11-800(7) or 197-11-800(8); or

d. Requires a land use decision that is not exempt under subsection 25.05.800.F.

2. The following types of construction are exempt, except when undertaken wholly or partly on lands covered by water:

a. The construction or location of residential or mixed-use development containing no more than the number of dwelling units identified in Table A for 25.05.800:

Table A for 25.05.800
Exemptions for residential uses

Zone	**Number of exempt dwelling units**		
	Outside ((~~urban centers and urban villages~~)) <u>regional centers and urban centers</u>	**Within ((~~urban centers and urban villages~~)) <u>regional centers and urban centers</u> where growth estimates have not been exceeded**	**Within ((~~urban centers and urban villages~~)) <u>regional centers and urban centers</u> where growth estimates have been exceeded**
NR and RSL	4	4	4
LR1	4	200[1]	20

Table A for 25.05.800
Exemptions for residential uses

Zone	Number of exempt dwelling units		
	Outside ((~~urban centers and urban villages~~)) regional centers and urban centers	**Within ((~~urban centers and urban villages~~)) regional centers and urban centers where growth estimates have not been exceeded**	**Within ((~~urban centers and urban villages~~)) regional centers and urban centers where growth estimates have been exceeded**
LR2	6	200[1]	20
LR3	8	200[1]	20
NC1, NC2, NC3, C1, and C2	4	200[1]	20
MR, HR, and Seattle Mixed zones	20	200[1]	20
MPC-YT	NA	30[1]	20
Downtown zones	NA	250[1]	200
Industrial zones	4	4	4

Footnotes to Table A for 25.05.800
NA = not applicable
((~~Urban centers and urban villages~~)) Regional centers and urban centers are identified in the Seattle Comprehensive Plan.
[1] Pursuant to RCW 43.21C.229, new residential development or the residential portion of new mixed-use development located in ((~~an urban~~)) a regional center or in an urban ((~~village~~)) center is categorically exempt from the State Environmental Policy Act, unless the Department has determined that residential growth within the ((~~urban center or village~~)) regional center or urban center has exceeded exemption limits for the center that the Department has established pursuant to subsection 25.05.800.A.2.i.

b. The construction of a barn, loafing shed, farm equipment storage building, produce storage or packing structure, or similar agricultural structure, covering 10,000 square feet or less, and to be used only by the property owner or the property owner's agent in the conduct of farming the property. This exemption does not apply to feed lots;

c. The construction of office, school, commercial, recreational, service, or storage buildings, containing no more than the gross floor area listed in Table B for 25.05.800:

Table B for 25.05.800
Exemptions for ((~~non-residential~~)) nonresidential uses

Zone	Exempt area of use (square feet of gross floor area)		
	Outside ((~~urban centers and hub urban villages~~)) regional centers and urban centers	Within ((~~urban centers and hub urban villages~~)) regional centers and urban centers where growth estimates have not been exceeded	Within ((~~urban centers and hub urban villages~~)) regional centers and urban centers where growth estimates have been exceeded
NR, RSL, and LR1	4,000	4,000	4,000
LR2 and LR3	4,000	12,000[1] or 30,000[2]	12,000
MR, HR, NC1, NC2, and NC3	4,000	12,000[1] or 30,000[2]	12,000
C1, C2, and Seattle Mixed zones	12,000	12,000[1] or 30,000[2]	12,000
Industrial zones	12,000	12,000	12,000
MPC-YT	NA	12,000	12,000
Downtown zones	NA	30,000	30,000

Footnotes to Table B for 25.05.800
NA = not applicable
((~~Urban centers and urban villages~~)) Regional centers and urban centers are identified in the Seattle Comprehensive Plan.
[1] New ((~~non-residential~~)) nonresidential development that is not part of a mixed-use development and that does not exceed 12,000 square feet in size is categorically exempt from the State Environmental Policy Act (SEPA).
[2] Pursuant to RCW 43.21C.229, new ((~~non-residential~~)) nonresidential development that does not exceed 30,000 square feet and that is part of a mixed-use development located in ((~~an urban~~)) a regional center or in ((~~a hub~~)) an urban ((~~village~~)) center is categorically exempt from SEPA, unless the Department has determined that employment growth within the ((~~urban center or village~~)) regional center or urban center has exceeded exemption limits for the center that the Department has established pursuant to subsection 25.05.800.A.2.i.

d. The construction of a parking lot designed for 40 or fewer automobiles, as well as the addition of spaces to existing lots up to a total of 40 spaces;

e. Any fill or excavation of 500 cubic yards or less throughout the total lifetime of the fill or excavation; and any excavation, fill, or grading necessary for an exempt project in subsections 25.05.800.A.2.a, 25.05.800.A.2.b, 25.05.800.A.2.c, or 25.05.800.A.2.d shall be exempt;

f. Mixed-use construction, including but not limited to projects combining residential and commercial uses, is exempt if each use, if considered separately, is exempt under the criteria of subsections 25.05.800.A.2.a through 25.05.800.A.2.d, unless the uses in combination may have a probable significant adverse environmental impact in the judgment of an agency with jurisdiction (see subsection 25.05.305.A.2.b);

g. In zones not specifically identified in this subsection 25.05.800.A, the standards for the most similar zone addressed by this subsection 25.05.800.A apply;

h. For the purposes of this subsection 25.05.800.A, "mixed-use development" means development having two or more principal uses, one of which is a residential use comprising 50 percent or more of the gross floor area;

i. To implement the requirements of Table A for 25.05.800 and Table B for 25.05.800, the Director shall establish implementation guidance by rule for how growth is measured against exemption limits and how changes to thresholds will occur if exemption limits are reached. The exemption limits shall consist of the growth estimates established in the Seattle Comprehensive Plan for a given area, minus a "cushion" of ten percent to assure that development does not exceed growth estimates without SEPA review; and

j. The Director shall monitor residential and employment growth and periodically publish a determination of growth for each ((~~urban center and urban village~~)) regional center or urban center. Residential growth shall include, but need not be limited to, net new units that have been built and net new units in projects that have received a building permit but have not received a certificate of occupancy. Per implementation guidance established by rule, if the Director determines that exemption limits have been reached for ((~~an urban center or~~

~~urban village~~)) a regional center or an urban center subsequent development will be subject to the lower thresholds as set forth in Table A for 25.05.800 and Table B for 25.05.800.

* * *

Section 114. Amendments made by Section 29 to subsections of Seattle Municipal Code Section 23.41.004 do not affect the expiration or repeal of those subsections by other ordinances.

Section 115. This ordinance shall take effect as provided by Seattle Municipal Code Sections 1.04.020 and 1.04.070.

Passed by the City Council the _____ day of _____, 2025, and signed by me in open session in authentication of its passage this _____ day of _____, 2025.

_____

President _____ of the City Council

Approved / returned unsigned / vetoed this _____ day of _____, 2025.

_____

Bruce A. Harrell, Mayor

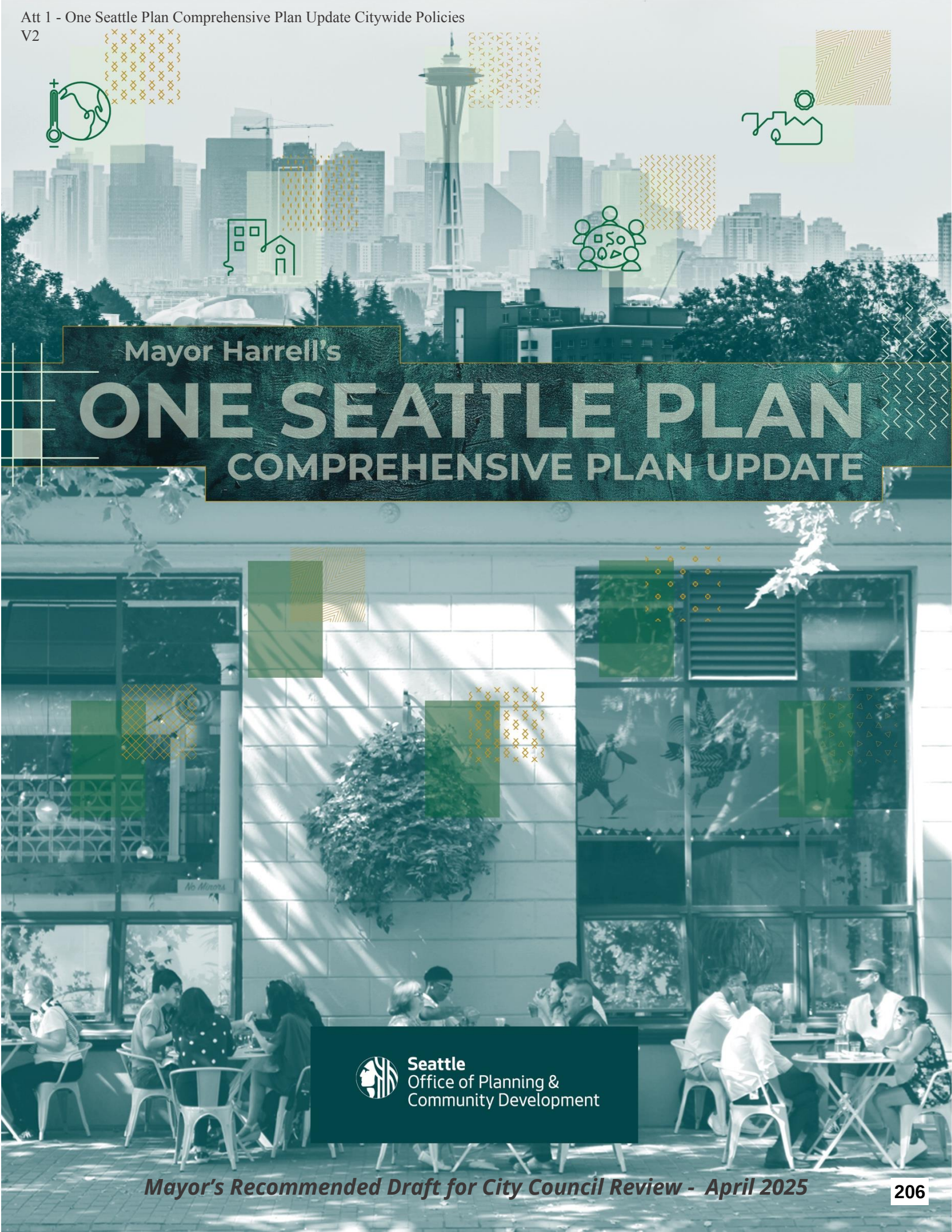
Filed by me this _____ day of _____, 2025.

_____

Scheereen Dedman, City Clerk

(Seal)

Attachments:
Attachment 1 – One Seattle Plan Comprehensive Plan Update Citywide Policies
Attachment 2 – One Seattle Plan Comprehensive Plan Update Appendices
Attachment 3 – One Seattle Plan Comprehensive Plan Update Subarea Plans Placeholder



Mayor Harrell's

ONE SEATTLE PLAN

COMPREHENSIVE PLAN UPDATE

Seattle
Office of Planning &
Community Development

Mayor's Recommended Draft for City Council Review - April 2025

Acknowledgements

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MAKERS
Parametrix
PolicyLink

Community Engagement Partners – Community Based Organizations

Asian Pacific American Labor Alliance
Duwamish Valley Sustainability Association
Estelita's Library
Khmer Community of Seattle/King County/
KIMYUNITY/Noio Pathways
Capitol Hill EcoDistrict
Wa Na Wari/ CACE 21
sləp̓iləbəxʷ (Rising Tides) Indigenous Planning Group

Boards and Commissions

Seattle Planning Commission
sləp̓iləbəxʷ (Rising Tides) Indigenous Planning Group
Equitable Development Initiative Advisory Board
Community Involvement Commission
Green New Deal Oversight Board
Mayor's Council on African American Elders
Human Rights Commission
Seattle Arts Commission
Seattle Bicycle Advisory Board
Seattle Disability Commission
Seattle Freight Advisory Board
Seattle Immigrant and Refugee Commission
Seattle-King County Advisory Council for Aging & Disability
Seattle LGBTQ Commission
Board of Parks and Recreation Commission
Seattle Pedestrian Advisory Board
Seattle Planning Commission
Seattle Renters' Commission
Seattle School Traffic Safety Commission
Seattle Transit Advisory Board
Seattle Women's Commission
Seattle Youth Commission
Urban Forestry Commission

Very Special Thanks

To all the individuals and organizations who gave time and thought to participate in the

One Seattle Plan process in person and online. The Plan is better and stronger because of your involvement.

CBO	Central Budget Office
DON	Department of Neighborhoods
FAS	Finance and Administrative Services
HSD	Health and Human Services
LEG	City Council Central Legislative Staff
Metro	King County Metro
NWSA	NW Seaport Alliance
OAC	Office of Arts and Culture
OED	Office of Economic Development
OEM	Office of Emergency Management
OH	Office of Housing
OPCD	Office of Planning and Community Development
OSE	Office of Sustainability and Environment
Port	Port of Seattle
SC	Seattle Center
S-KCPH	Seattle King County Public Health
SCL	Seattle City Light
SDCI	Seattle Department of Construction and Inspection
SDOT	Seattle Department of Transportation
SFD	Seattle Fire Department
SIT	Seattle Information and Technology
SPL	Seattle Public Library
SPD	Seattle Police Department
SPR	Seattle Parks and Recreation
SPS	Seattle Public Schools
SPU	Seattle Public Utilities
ST	Sound Transit
WSDOT	Washington Dept of Transportation

Citywide Policies

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Introduction

Seattle's Comprehensive Plan is a roadmap for where and how our city will grow and invest in our communities over the next 20 years and beyond. Seattle last engaged in a citywide process to update its Comprehensive Plan nearly a decade ago. This major update, the One Seattle Plan, advances a vision for the future that aligns with our City's core values to make Seattle equitable, livable, sustainable, and resilient for today's residents and generations to come.

The One Seattle Plan (Plan) was created in dialogue with people throughout Seattle about the future they want to see for themselves, their families, their communities, and the city they call home. The Plan was developed through extensive public engagement with a focus on seeking diverse community input, and this dialogue will continue as we work to implement this Plan in the coming years.

The Comprehensive Plan addresses a wide range of topics, but a few themes comprise the heart of this Plan. These are the **four key moves** that respond to the issues and concerns emphasized by community members and stakeholders across the city and that will guide our planning for the next 20 years. The Plan also addresses important regional and statewide priorities and laws intended to facilitate construction of affordable and family housing, improve mobility, and allow for future population growth and climate resilience. Taken together, numerous goals and policies in the Plan further each of the following:

Housing and Affordability: Expand housing opportunities across the city. This Plan is designed to meet Seattle's pressing housing needs now and into the future. In a rapidly growing region, a housing shortage is one factor that makes homes too expensive for people to afford and is a root cause of homelessness. The impacts are greatest for people with low incomes and Black, Indigenous, and People of Color (BIPOC) communities who may have less access to intergenerational wealth than white communities. Ultimately, many people across the city feel the strain of high housing costs in different ways. This Plan encourages more housing in more places to create a future where homes are plentiful, fewer households are burdened by unaffordable housing costs, and people achieve stable housing. This Plan also creates opportunities to employ our public resources, including the Seattle Housing Levy, to build the housing we need.

The shortage of quality, affordable family-sized homes is pushing too many families out of our city or straining their resources to stay in Seattle. We must align our housing plans to meet this specific need and ensure that homes that meet the needs of families—particularly low- and middle-income households—are built and maintained in every neighborhood. Housing near schools, childcare, transit lines, and other services can help stabilize neighborhoods, improve enrollment in our schools, and keep Seattle a city that protects and supports kids and families.

Equity and Opportunity: Promote a more equitable Seattle as we grow. Over generations, Seattle's growth has not provided equal benefits to all communities. Policy decisions, lack of investment, and discriminatory housing practices, including redlining and racially restrictive covenants, have led to the displacement of BIPOC communities and limited access to home ownership and generational wealth building for these residents. This Plan takes steps towards addressing these harms, and ushers in a new, more equitable strategy for how Seattle will grow in the future. New growth must welcome newcomers, help communities thrive in place, *and* provide opportunities for former residents who have been displaced to return.

Community and Neighborhoods: Focus growth and investment in complete, walkable communities. Our vision for One Seattle includes a network of complete, connected communities that welcome more neighbors of all ages, races, ethnicities, and incomes. This Plan supports economically vibrant neighborhoods across the city with focused growth near transit, including light rail and high-quality frequent bus service, so residents can meet their everyday needs nearby without needing a car. This Plan takes steps to foster more walkable neighborhoods that are welcoming and accessible, with safe public spaces for neighbors to gather and build community.

Climate and Sustainability: Meet the challenges of climate change for a resilient future. Seattle residents are feeling the impact of the climate crisis with more extreme weather events every year, disproportionately impacting lower income residents and communities of color. This Plan introduces a Climate and Environment element that redoubles our effort to reduce our carbon footprint and build resiliency in frontline communities most vulnerable to climate impacts. The new element includes strategies to reduce climate pollution from key sectors: transportation, development pattern, buildings, energy, and solid waste. It also promotes a wide range of measures to enhance the resilience of our communities and natural environment that are threatened by current and potential climate impacts.

Trends and Challenges

Each major update to a city's comprehensive plan is an opportunity to take stock of what has changed since the last update and what issues and challenges are paramount for the city and its residents now. Significant trends and events that transpired in the last decade that shape this Plan are summarized below. The One Seattle Plan strives to address and respond to these and other recent and ongoing drivers of change.

Continued Rapid Growth

In the years preceding this Plan, Seattle was one of the fastest growing major cities in the country. From 2010 to 2020, the city experienced a huge increase in employment, adding more than 175,000 jobs – a gain of 38%. While housing was produced at a historic pace with the addition of 60,000 net

new homes over the same time period, an increase of 19%, the scale of production was not enough to keep pace with employment and population growth. Much of the new job growth was in high-wage fields, as Seattle's per capita income notched up to nearly $75,000, the second highest among U.S. large cities.

Effects of the Global Pandemic

The COVID-19 pandemic caused major immediate and potential long-term changes to cities around the world. In Seattle, BIPOC communities experienced disproportionate health, economic, and social impacts. These disparities underscore the racial and social inequities that persist in our city, region, and country. The pandemic also accelerated shifts in how we work, which has changed daily activity and commuting patterns, impacted centers of office employment like Downtown, and elevated the value of neighborhoods, public space, and local access to amenities.

Lack of Affordability

The cost of housing in Seattle continues to be a problem. The average annual Zillow Home Value Index for a detached home more than doubled from $415,000 to $945,000 from 2012 to 2022, far beyond what most Seattle-area households can afford. The median monthly cost of rent and basic utilities increased by 75% from $1,024 in 2011 to $1,787 in 2021. Lack of affordability is linked directly to an increase in people without a home, which reached an estimated 33,700 people in King County according to the state Department of Commerce's Snapshot of Homelessness for July 2022.

Displacement Pressure

In the years preceding this Plan, displacement pressure continued to be a major concern for many Seattle residents and businesses. A recent Puget Sound Regional Council (PSRC) survey found that 27% of Seattle households who moved within the region from 2014 to 2019 did so due to rising housing costs or other displacement-related reasons. While the population of color in Seattle as a whole has increased, many neighborhoods in South Seattle have seen substantial decreases in certain communities of color as housing in these areas becomes less affordable. Neighborhoods in and around the Central Area have continued to see very large decreases in the numbers of Black residents. Other neighborhoods with large shifts include Beacon Hill and Seward Park, where the Asian population has continued to decrease. Furthermore, the number of Hispanic and Latino residents counted in South Park decreased between 2010 and 2020 in significant contrast to this population's growth in the neighborhood between 1990 and 2010.

Climate Change

As the climate changes, Seattle residents are experiencing environmental, health, and economic effects. In recent years Seattle has seen numerous unprecedented or historically rare extreme weather events including but not limited to extreme heat events with temperatures over 105 degrees (2021), regular smoke events in late summer (2017, 2018, 2020, 2021, 2022, 2023), and tidal flooding of neighborhoods in the Duwamish River floodplain (2022). These changes are harmful for

everyone, but frontline communities, those who experience the first and worst consequences of climate change, bear a disproportionate burden of harm. Globally, the 10 warmest years in the historical record have all occurred since 2010.

Expansion of Regional Transit

Over the past several years, Sound Transit has taken major steps to expand light rail – the region's primary high-capacity transit system. Since the last Comprehensive Plan update light rail service was extended with service from University of Washington to Northgate and stations north of Seattle, and new service across Lake Washington with a station at Judkins Park will open in 2025. In 2016 voters approved the nearly $54 billion Sound Transit 3 measure, which will further expand light rail during the 20-year timeframe of the One Seattle Plan with a new line from Ballard to West Seattle and roughly a dozen new or expanded stations within the city.

Four Key Moves

The following summarizes how this Plan helps advance the four key moves.

Housing and Affordability: Expand Housing Opportunities across the City

The One Seattle Plan is designed to improve the supply, variety, and affordability of housing across the city. Our approach addresses past exclusionary policies and practices and the need to expand housing and neighborhood access. It sets a vision for the future of Seattle where housing options are diverse, affordable, and meet the needs of current and future households of all sizes, incomes, and cultures. Increasing our ability to build more housing in more places will help to ease market pressures that are driving up costs and contributing to displacement of BIPOC and low-income households and provide more affordable housing options for the working families of today and tomorrow.

ENCOURAGE MIDDLE HOUSING IN NEIGHBORHOOD RESIDENTIAL ZONES

The Growth Strategy allows for a broad range of housing types throughout Seattle's Neighborhood Residential (formerly Single Family) zones. The planned density and variety of housing is designed to meet new state requirements for "middle housing" (HB 1110) and includes opportunities to add new housing types, like duplexes, triplexes, fourplexes, sixplexes, stacked flats, and cottage housing in Neighborhood Residential zones across the city. These changes will provide new opportunities for diverse households to find the housing they need with access to high-quality neighborhood amenities. New homeownership options will provide housing stability and wealth building opportunities.

CREATE NEW HOUSING OPPORTUNITIES IN EXISTING AND EXPANDED CENTERS, INCLUDING NEW NEIGHBORHOOD CENTERS

For nearly 30 years, Seattle's growth strategy has concentrated growth in Urban Centers and Villages. The updated strategy creates new and expanded opportunities for housing and growth

near our major transit investments and established centers and villages. In addition, new Neighborhood Centers will allow additional moderate-density housing around commercial nodes, bus rapid transit stops, and neighborhood amenities. These additions to the City's current strategy for growth add to the supply of housing with wider opportunities for people to live within a short walk, bike, or transit ride to meet their daily needs.

EXPAND INVESTMENTS IN AFFORDABLE HOUSING

Even with the expansion of housing supply, market housing development is not expected to meet the needs of all segments of our community. The Housing element supports continued and increased investments in affordable housing. Under this Plan, resources from the Seattle Housing Levy, funds generated from development, current and potential new Federal and State resources, and incentives would expand the city's supply of income-restricted homes.

Equity and Opportunity: Promote a More Equitable Seattle as We Grow

Every resident should have the opportunity to thrive and to be a part of Seattle's future and its growing economy, but the benefits and burdens of our city's growth have not been distributed equitably. Many people, based on their race, ethnicity, gender, ability, income, or sexual orientation, have been historically excluded from the same housing and job opportunities, security, and freedoms that other Seattle residents have. This Plan begins to address the harmful effects of racially restrictive zoning by expanding the types of housing allowed in neighborhoods across Seattle. It also prioritizes programs and investments to support low-income and BIPOC communities that have experienced historical underinvestment to thrive. In these ways, this Plan works toward repairing historical injustices and building a more inclusive city.

REDUCE HOUSING AND NEIGHBORHOOD EXCLUSION

Policies in the Growth Strategy, Land Use, and Housing elements aim to lessen the patterns whereby BIPOC families and lower-income households have been excluded for generations from Seattle's neighborhoods and from homeownership opportunities. The Plan calls for more types of housing in many areas of the city and includes strategies to produce homes that are accessible, affordable, and designed to meet the needs of Seattle's diverse households. In doing so, we aim to redress the legacy of redlining and racially restrictive covenants that shape Seattle to this day. See the Housing Appendix for a detailed summary of racially disparate impacts and harms to BIPOC communities from racially restrictive policies and practices.

REDUCE RISK OF DISPLACEMENT

The Plan embraces a vision of growth without displacement of households, businesses, and cultural communities that are currently at risk of being forced to leave Seattle. The Plan highlights anti-displacement strategies across many elements and builds on many anti-displacement programs the City has in place. The Growth Strategy is designed to reduce market pressure that has contributed to displacement of lower-income households and boost the supply and variety of housing across the city to slow increases in the cost of housing. Both the Plan and the actions the City will take to achieve this vision are informed by data and ongoing input from communities at high risk of displacement.

SUPPORT WEALTH BUILDING

The Plan promotes a range of strategies to help BIPOC community members develop generational wealth. The Growth Strategy and Housing elements support new opportunities for homeownership. The Economic Development and Arts and Culture elements enhance support for local small businesses, cultural institutions, asset ownership, and job training. The Plan also includes policies supporting the ability of community members to benefit from employment and other opportunities created with City investments.

INVEST EQUITABLY TO MEET COMMUNITY NEEDS

Policies in the Transportation Element, Parks & Open Space Element, Arts and Culture, and Capital Facilities elements call for centering racial equity when directing investments into new facilities, infrastructure, and programs. The Plan prioritizes the allocation of resources for safer streets, new parks, arts facilities, community centers, and resilience hubs, among others, into communities that have been underinvested in and underserved for decades.

Community and Neighborhoods: Focus Growth and Investment in Complete, Walkable Communities

The One Seattle Plan aims to create more complete communities where Seattleites can gather with one another, meet their daily needs, and access what they love about their neighborhoods, all within an easy walk or bike, thus reducing reliance on automobiles. This Plan features new and expanded locations for growth, and focuses growth where residents can access transit, including light rail and high-quality frequent bus service, close to home. It supports economically vibrant neighborhoods, strong business districts, and new opportunities for convenient amenities like neighborhood corner stores. Several elements include goals and policies to build more complete neighborhoods and a more connected city.

CREATE COMPLETE COMMUNITIES

The Growth Strategy in this Plan will enable the development of more complete and connected neighborhoods where residents can walk, bike, and roll to meet their everyday needs. This will be achieved by building on the investments in our current Urban Villages and Centers and adding new and expanded areas for growth, creating housing opportunities around existing neighborhood business districts with shops, services, open space, and gathering places, and allowing a wider mix of non-residential uses in all our neighborhoods. New Neighborhood Centers are expected to feature more services and become focal points for their local communities.

ENSURE SAFE STREETS FOR ALL

This Plan was developed in coordination with the new Seattle Transportation Plan. In both plans, there is a strong focus on improving safety and reducing the degree to which streets are used for motor vehicles only. The Transportation element leads with physical safety, calling for protection of our most vulnerable road users. See the Promoting Safe Travel for All section of this element. The One Seattle Plan also promotes flexible use of our limited right of way and expanded safe and affordable transportation choices along with more options to use our right-of-way for people-centered activities and spaces that enliven streets and support communities.

ENHANCE AND EXPAND OPEN SPACES

The Parks and Open Space element focuses on addressing inequities in access to high-quality public spaces. Since Seattle is largely built out, this will include adding new opportunities and programming at existing parks and thinking creatively about new ways to provide public spaces in partnership with other agencies and community stakeholders.

CENTER ARTS AND CULTURE IN OUR NEIGHBORHOODS

The Arts and Culture element emphasizes the importance of cultural spaces and a network of activities that support the vibrancy of the city as a whole and, in particular, among BIPOC communities and young people. Goals and policies support a wide range of cultural spaces, both in the public realm and at a wide range of venues in community, that will help define the social character and identity of neighborhoods. The Plan calls for investments in public art that highlight the cultures of our neighborhoods and diverse communities.

Climate and Sustainability: Meet the Challenges of Climate Change for a Resilient Future

The One Seattle Plan introduces a new Climate and Environment element that redoubles our commitment to reduce the impacts of climate change. The element also focuses our efforts to make Seattle resilient in the face of these threats, especially for our most vulnerable populations and frontline communities. Our principles of stewardship and community resilience are shaped and strengthened by the values and practices of the Coast Salish peoples, informed by ongoing engagement with Tribes in the region and our urban Indigenous community members.

ACHIEVE CARBON NEUTRALITY BY 2050

The City has committed to making Seattle carbon neutral by the year 2050 in order to reduce our collective impact on the global environment through climate pollution that contributes to climate change. This Plan guides broad-based actions to further a just transition away from reliance on fossil fuels. Government, businesses, and residents will need to work together to fulfill the long-term goals set forth in Seattle's Climate Action Plan. Plan elements, such as Transportation, Capital Facilities, and Utilities, reinforce our climate mitigation with more specific policy direction to reduce our emissions.

REDUCE AUTOMOBILE DEPENDENCE

Goals and policies in numerous elements including Growth Strategy and Transportation promote development and investments that will make walking, biking, and public transit viable options for more people, thus reducing reliance on automobiles—a major source of climate pollution in this region.

BUILD CLIMATE RESILIENCE

The impacts of climate change affect everyone, but disproportionately affect BIPOC communities, immigrants, refugees, people with limited English language proficiency, people with disabilities, and low-income residents. Climate impacts include heat, smoke, sea level rise, flooding, and impacts from other extreme weather events. With the need to adapt to the present and future impacts of

climate change, a new climate resilience sub-element includes policies that will shape how we invest equitably in communities across the city to become more complete, healthy, and resilient over time.

CONTRIBUTE TO A SUSTAINABLE REGION

By taking on a more significant share of the region's growth, Seattle helps protect rural farms and forests from development. It is also a way for our City to contribute to reducing climate pollution on a regional scale by welcoming more affordable opportunities for people to live closer to regional centers of employment, education, and culture. The Growth Strategy element of this Plan adopts new approaches to accommodate more of the people coming to our region over the next 20 years.

State and Regional Policy Framework

Washington's Growth Management Act (GMA)

Enacted in 1990, Washington's Growth Management Act (GMA) requires counties and cities to create and regularly update comprehensive plans that prepare us for projected growth in population, housing, and jobs.

The GMA's goals include protecting farms and forests from sprawl and directing growth to already urbanized areas, especially cities. Each county, in collaboration with its cities, has established an urban-growth boundary, and each city must demonstrate that it is prepared for the urban growth that is expected over the next 20 years. The GMA requires comprehensive plans to address a range of topics and in recent years the State legislature added significant new requirements related to how local governments plan for housing and climate change. The GMA also requires that each city's plan be consistent with other plans in the region, as described below.

VISION 2050 / Seattle in the Region

With the most people and jobs of any city in Washington State, Seattle is the center of the fast-growing central Puget Sound region. Made up of King, Snohomish, Pierce, and Kitsap Counties, this growing and dynamic metropolitan region expects to reach a population of 5.8 million and include a total of 3.4 million jobs by the year 2050.

The Puget Sound Regional Council (PSRC) is the regional growth management, transportation, and economic development planning organization. PSRC's VISION 2050 Plan envisions the region's growth occurring in centers and alongside our transit investments. VISION 2050 allocates especially large shares of growth to five "metropolitan cities"—Seattle, Bellevue, Everett, Tacoma, and Bremerton. The One Seattle Plan reflects Seattle's commitment to accommodate its share of growth as the metropolitan city at the heart of the region. Multicounty Planning Policies (MPPs) in VISION 2050 also provide guidance for local plans. PSRC reviews and certifies comprehensive plans for consistency with the MPPs.

The PSRC formally designates centers of regional importance within cities. The One Seattle Plan identifies seven Regional Centers, referred to as Urban Centers in Seattle 2035, (see figures 2 and 3)

and two Manufacturing and Industrial Centers in Seattle (see figure 10). Subarea Plans for each of these centers will be included as part of the Plan as they are updated over time.

Countywide Planning Policies

In King County, the Growth Management Planning Council (GMPC) is made up of elected officials representing the county and its cities. These jurisdictions worked together to develop the Countywide Planning Policies (CPPs), which provide guidance for local comprehensive plans. The CPPs contain housing and job growth targets for each jurisdiction along with estimates of future affordable housing needs.

The CPPs include a process for designation of Countywide Centers, which, like Regional Centers, are locations where the region intends to focus growth and investment of the next 20 years. The CPPs provide a similar range of policy guidance for the content of local comprehensive plans as do the MPPs in VISION 2050, but with more detail to address the needs and goals of cities in King County.

Developing the One Seattle Plan

We developed the One Seattle Plan through a three-year process of research, analysis, and engagement with communities across the city. We analyzed data to better understand how the city had changed since the last time we updated the Comprehensive Plan and to explore the most pressing challenges facing the city, including, as described above, persistent racial inequities, climate change, and housing affordability.

We used the City's Racial Equity Toolkit (RET) to inform our process in creating the One Seattle Plan. The RET was created by the City's Office for Civil Rights as a framework for understanding the potential impacts of new government actions on racial equity and daylight any unintended consequences for BIPOC community members. The RET and Race and Social Justice ordinance guide the City's community engagement toward centering the voices of BIPOC and other historically under-represented communities.

The City's approach to equitable community engagement, which occurred online, in person, and through community organization partnerships, guided the preparation of this Plan and is reflected in the goals, policies, and narrative of the Plan. Feedback from communities across Seattle has been a critical input in its drafting.

Heightened engagement with Indigenous stakeholders, including Tribes, organizations serving and representing the urban Indigenous community, and community members, informed and shaped the major themes of this Plan which foster a sustainable and equitable future, as well as specific policies across multiple elements that address key issues. Informed by this work, Indigenous peoples' perspectives, values, and ideas are incorporated in various parts of the Plan.

Plan Implementation and Framework for Accountability

Implementing the Plan

The City will implement the One Seattle Plan through regulations, such as zoning and development standards, and through investments detailed in the functional plans developed by City departments. The principal purpose of this Comprehensive Plan is to provide policies that guide the development of the city in the context of coordinated regional planning and the City's core values. Community members and officials from all levels of government can look to these policies when planning for growth.

The Plan is made a reality through City-led coordination and actions by the private sector, non-profit and community-based organizations (CBOs), and other government agencies that also help shape Seattle's future in significant ways. For example, the private sector builds most new housing, King County provides bus service, Sound Transit builds and provides light rail, Seattle Public Schools provides public education, the Port of Seattle operates shipping terminals, and CBOs provide services like childcare and job training. The City partners with these agencies to ensure we collaboratively work toward common goals. Implementation of this Plan therefore relies on the City maintaining relationships with many organizations throughout the region.

Although the City itself will use the Plan to direct the development of regulations that govern land use and development, it will not use the Plan to review applications for specific development projects, except when an applicable development regulation expressly requires reference to this Comprehensive Plan.

Components and Structure of the Comprehensive Plan

Each element of this Plan generally presents goals followed by policies related to those goals and may also include a discussion about the goals and policies. Some chapters also have appendices that contain important data and analysis that inform and provide context for our goals and policies.

Goals represent the results that the City hopes to realize over time, generally within the 20-year life of the Plan, except where interim time periods are stated. Whether expressed in terms of numbers or only as directions for future change, goals are aspirations, not guarantees or mandates.

Policies should be read as if preceded by the words "It is the City's general policy to…". A policy helps to guide the creation of or changes to specific rules or strategies (such as development regulations, budgets, or program plans). City officials will generally make decisions on specific City actions by following ordinances, resolutions, budgets, or program plans that reflect relevant Plan policies, rather than by referring directly to this Plan.

Implementation of most policies involves a range of actions over time, so one cannot simply ask whether a specific action or project would fulfill a particular Plan policy. For example, a policy that states that the City will give priority to a particular need indicates that the City will treat the need as important, not that it will take precedence in every City decision. Some policies use the words shall,

should, ensure, encourage, and so forth. In general, such words describe the emphasis that the policy places on the action but do not necessarily establish a specific legal duty to perform a particular act, to undertake a program or project, or to achieve a specific result.

Monitoring and Accountability for Plan Implementation

A monitoring and accountability framework for the One Seattle Plan will include regular data collection and reporting by the City on:

- Actions taken to implement the Plan, including by individual departments and in coordination among departments
- Indicators that tell us whether we are on track to achieve the outcomes envisioned by the Plan, especially racial equity outcomes

Reporting and monitoring will span the Plan's elements, with a special focus on the Growth Strategy and Housing. This will include metrics and mapping to assess how well the Growth Strategy is working to accommodate new housing and jobs; guide growth to create more complete, connected, and inclusive neighborhoods; and help existing residents and community-serving institutions and businesses to thrive. Monitoring will also look at how well place types in the Growth Strategy are performing their roles.

The City's recent reporting on indicators of equitable development and housing needs informing this Plan show deep disparities in well-being, access to opportunity, and displacement risks. Monitoring will build on these analyses and continue to include data on outcomes by race, income, neighborhood, and other factors so that people- and place-based actions and investments to implement the Plan can be focused to tackle remaining disparities.

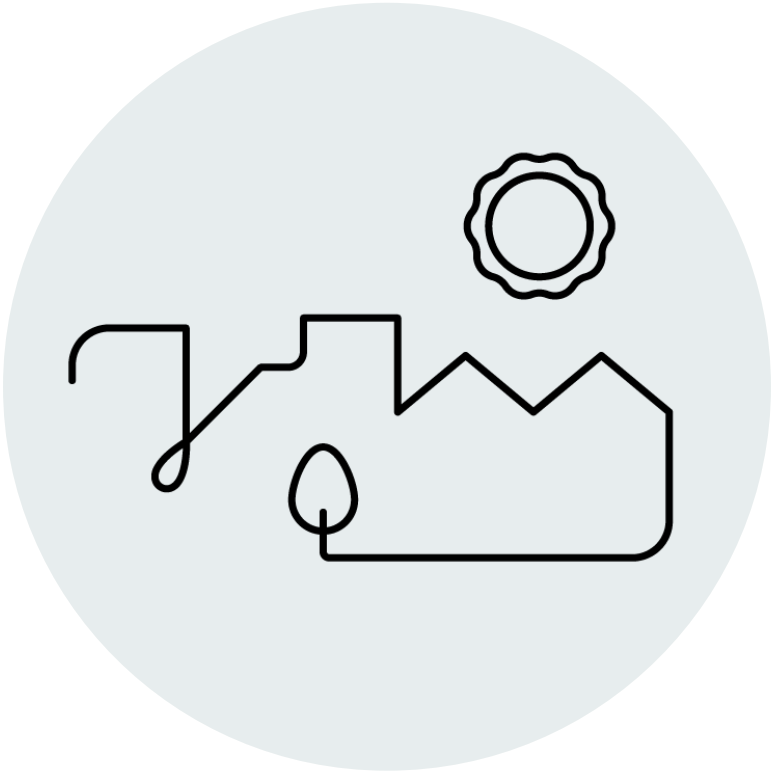
The City's approach to monitoring and accountability will include the following:

- Providing information that is accessible and useful for the public
- Enabling community stakeholders to engage in meaningful ways to shape monitoring, impact Plan implementation, and hold the City accountable when our actions or outcomes fall short of its goals
- Collaborating on an interdepartmental basis, leveraging the work that City departments are doing to monitor progress on functional plans and initiatives integral to implementing the One Seattle Plan
- Using monitoring to gauge progress, and to understand challenges that may require the City to intensify its efforts, consider different strategies, or amend the Comprehensive Plan

One important way the City will track progress is by working with the Affordable Housing Committee of the King County GMPC to monitor and report on our progress toward housing goals and policies consistent with new GMA requirements, including:

- Annual monitoring of housing trends and City implementation actions
- A 5-year implementation status report by 2029

The results of this and other similar accountability measures will shape future actions to implement this Plan to achieve our desired future for Seattle.



Growth Strategy

Introduction

Seattle is expected to grow significantly over the next 20 years and beyond. Forecasts of future growth and the region's growth plans indicate that the city will reach one million people by the middle of this century. Growth represents both an opportunity and a challenge. Accommodating new people and jobs can add vibrancy to our city and address climate change by allowing more people to live a low carbon lifestyle. However, if we don't plan for and accommodate a growing population, housing costs will continue to rise, pushing many people out of Seattle, worsening our homelessness crisis, and making many neighborhoods accessible only to high-income households.

In 1994, Seattle adopted its first Comprehensive Plan under the state Growth Management Act (GMA) with a growth strategy that concentrated nearly all growth in designated areas called Urban Centers and Urban Villages. Minimal growth was planned for single-family-zoned areas, which account for most land across the city. For 30 years, this "Urban Village strategy" has been effective in

creating dense, walkable, mixed-use neighborhoods served by high-quality transit in selected areas of the city. It has helped to shape major public and private investments, especially new and expanded transit service. The strategy also has helped the city accommodate an important share of the region's housing and employment as part of the region's collaborative approach to planning for growth. Between 2010 and 2020, 83% of new homes were built in Urban Centers or Villages.

Even with successes, however, the strategy has fallen short of meeting the needs of all Seattle residents for affordable and diverse housing choices, access to neighborhoods of opportunity, and community stability in the face of rising displacement pressures.

Many neighborhoods outside Urban Centers and Villages have few housing options beyond detached homes. As documented in detail in the Housing element and Housing Appendix, zoning that allows only low-density detached housing is rooted in a history of racial and class exclusion marked by policies and real estate practices such as redlining and racial covenants. With the prices of these homes rising dramatically, especially in the last 10 years, these neighborhoods are increasingly out of reach for most people, perpetuating patterns of racial and economic exclusion and contributing to market pressures that cause displacement and gentrification.

Meanwhile, many Seattle residents seek housing options and neighborhood choices that our growth strategy has not provided. Housing types such as duplexes, triplexes, fourplexes, small, stacked flats, cottage housing, courtyard apartments, and other low-scale residential types, all examples of what is frequently referred to as "middle housing," have not been allowed in most areas. Middle housing can provide comparatively affordable family-sized housing, options for homeownership, and opportunities to reside in neighborhoods with key amenities, such as parks and schools.

The updated growth strategy includes expanded middle housing options in all neighborhoods. These changes are consistent with new state requirements which will expand housing choices in cities across the region and state.

This Plan also embraces a vision for "complete communities" where a rich mix of housing options are available within a short walk or bike trip to the goods, services, and amenities that residents need every day. Making this vision a reality in more neighborhoods will address the needs and desires expressed by community members across the city while also supporting the City's climate goals.

Urban Centers and Villages will continue to play an important role in a proposed new growth strategy for the next 20 years. At the same time, the One Seattle Plan adds new opportunities and locations for housing and job growth to create more complete, connected, and inclusive communities. Key goals for this growth strategy are to:

- Accommodate new housing and jobs over the next 20 years and beyond
- Increase the supply, diversity, and affordability of housing to reduce upward pressure on prices and expand choices for diverse households
- Redress harms from neighborhood exclusion and housing discrimination, meet the housing needs of BIPOC households, and support wealth building opportunities

- Prevent the displacement of residents due to direct impacts and market forces
- Create and support communities where more people can access transit, shops, and services by walking, biking, and rolling
- Encourage a diverse mix of businesses and jobs in neighborhoods across the city and help existing businesses remain in place

Advancing this vision are goals, policies, and implementation actions outlined in multiple elements. This Growth Strategy element describes where and how the City should accommodate expected housing and job growth to achieve a more equitable, sustainable, and resilient development and investment pattern than in the past. This element includes a description of the types of uses and buildings that are appropriate in different parts of Seattle. Other elements of this Plan describe tools the City will use to achieve the growth strategy as well as other investments and strategies necessary to meet our overall goals. For example, the Land Use element describes how zoning and development regulations will control the location and size of new buildings in ways that help carry out the growth strategy. The Housing element includes policies that will guide the types and characteristics of housing the City will aim for and the tools the City will use to make it possible for people of all backgrounds and households at all income levels to find housing that meets their needs. The Transportation element includes a policy framework for investments in multiple modes of travel that serve all areas of the city where growth will occur.

Planning for Growth

DISCUSSION

This section includes the goals and policies that apply to the growth strategy as a whole and inform the more detailed approaches discussed in later sections.

The goals and policies in this section respond to the needs of the City as well as the need to plan for and accommodate population, housing, and jobs as set forth in requirements in the state Growth Management Act (GMA). Our growth strategy implements the Regional Growth Strategy in VISION 2050 adopted by the Puget Sound Regional Council as a long-range growth management plan for the four-county central Puget Sound region. The strategy also meets the City's obligation to accommodate a substantial share of the growth in King County as prescribed in the targets for housing and employment growth adopted by the Growth Management Planning Council (GMPC). Estimated GMPC growth targets for the 2024-2044 period are for the city to accommodate at least 80,000 housing units and 159,000 jobs.

GOAL

GS G1 Seattle becomes a more equitable, vibrant, connected, and livable city with housing for a diverse and growing population; space for working, learning, and finding joy; and complete communities where people of all ages and abilities can walk, bike, and roll to meet their everyday needs.

POLICIES

GS 1.1 Plan for expected growth over the next 20 years to accommodate minimum targets in the Countywide Planning Policies while also providing additional housing capacity to enable the City to respond to existing unmet needs and potential demand from future population and employment growth.

GS 1.2 Encourage and plan for a variety of housing types in all neighborhoods to provide opportunities for a diverse population to live throughout the city and to allow people to stay in their neighborhoods as their needs change.

GS 1.3 Accommodate and plan for non-residential uses in neighborhoods across the city, including opportunities for major employers in areas with access to high-capacity transit and opportunities for local-serving businesses and services throughout Seattle.

GS 1.4 Focus higher-density housing and commercial space in areas near transit, parks, shops, services, walking and biking infrastructure, and other amenities.

GS 1.5 Limit rezones that would result in negative impacts to environmentally critical areas.

GS 1.6 Avoid incompatible uses adjacent to general aviation airports.

GS 1.7 Focus higher-density office and employment uses in areas with access to regional transit.

GS 1.8 Focus industrial growth in designated Manufacturing and Industrial Centers while also allowing space in other areas throughout Seattle for light industrial businesses that support other businesses and residents.

GS 1.9 Coordinate planning for transportation, utilities, parks and recreation, libraries, and other public services to meet the anticipated growth and increased density throughout Seattle.

GS 1.10 Focus public investments to meet current and future needs, which includes supporting areas experiencing or planned for residential and employment growth, particularly in designated centers, and addressing current inequities and areas of historical under-investment.

Growth Strategy Overview

DISCUSSION

All areas in the city have a role in accommodating future housing growth, employment growth, or both. This section outlines the roles that different areas of Seattle should play and the type of residential, commercial, institutional, and industrial buildings that are appropriate in each.

Specifically, this section describes different "place types" and maps where they might be designated on the Future Land Use Map (FLUM).

The FLUM is a requirement of the Growth Management Act and is intended to show the desired scale and use of buildings for different parts of Seattle. This map provides guidance that is used in developing and updating more detailed zoning maps and development standards which regulate the size, use, and design for new development. As such, the FLUM and policies in the Growth Strategy element complement and are integral to goals and policies in the Land Use element.

Figures 1 and 2 below show the FLUM and briefly describe the place types that comprise the Seattle growth strategy. As the City's needs and priorities shift, the FLUM may be formally amended.

GOAL

GS G2 Seattle's development pattern, as shaped by the Future Land Use Map, results in a range of vibrant places that all play a role in accommodating housing and jobs.

POLICIES

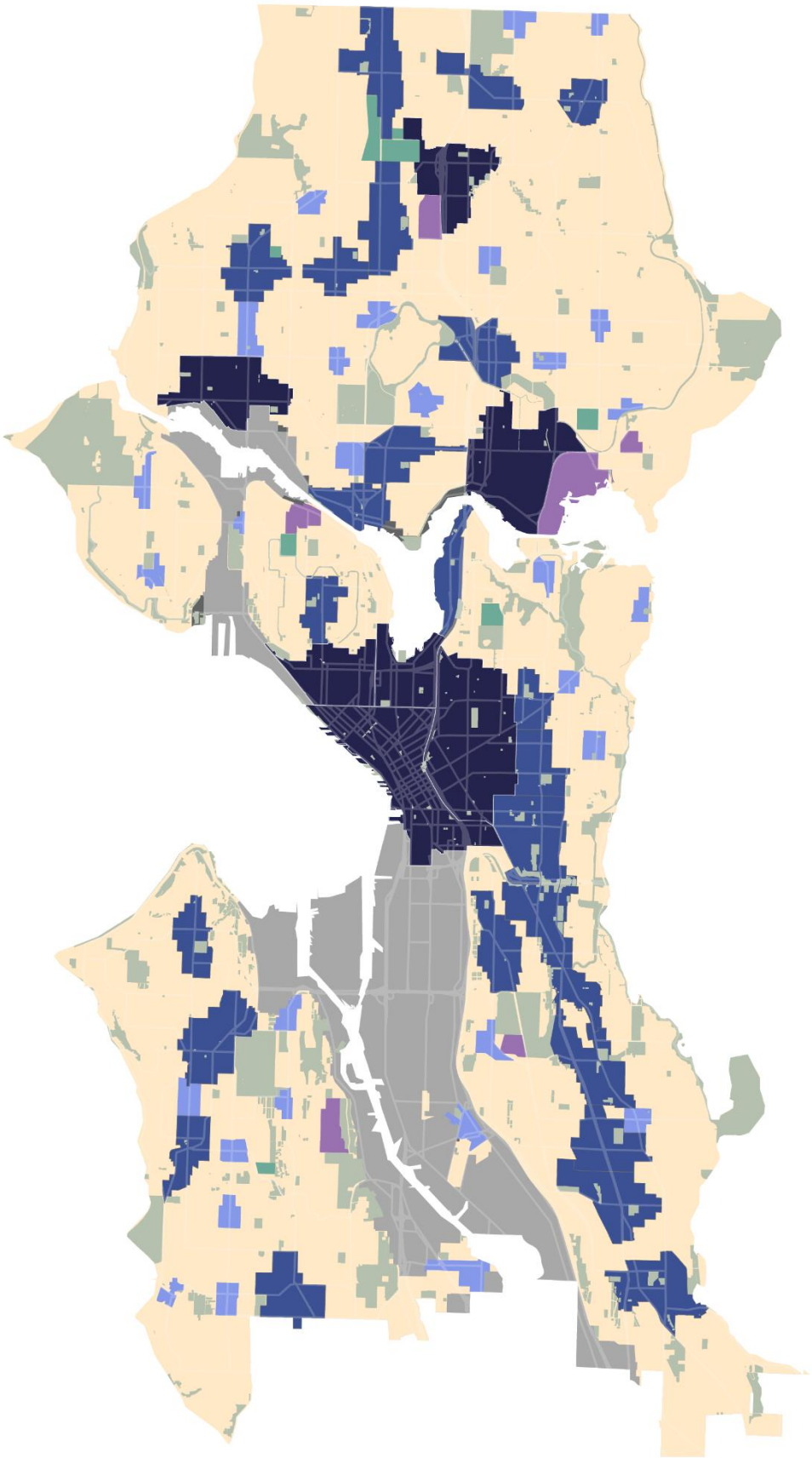
GS 2.1 Use the Future Land Use Map to guide land use regulation.

GS 2.2 Require FLUM amendments only when needed to achieve a significant change to the intended function of a large area.

Figure 1
Description of Place Types that appear on the FLUM

PLACE TYPES	DESCRIPTION
Regional Center	Places with an important regional role with substantial housing, office, retail, institutional, and/or entertainment uses and access to regional transit. Designated as Regional Growth Centers by the Puget Sound Regional Council.
Urban Center	Places with an important citywide role with a wide range of housing, jobs, shops, and services and access to regional or local transit. Designated as Countywide Centers by the King County Growth Management Planning Council.
Neighborhood Center	Places with an important local role with a variety of housing located around a commercial core and/or access to frequent transit that provides an opportunity for people to access everyday needs within a short walk or bike ride from their homes.
Urban Neighborhood	Places outside centers that are characterized by primarily residential development with limited non-residential uses.
Manufacturing and Industrial Center	Areas of concentrated industrial activity with limited retail, office, and residential uses, that primarily serve industrial businesses and workers. Designated as regional Manufacturing and Industrial Centers by the Puget Sound Regional Council.
OTHER AREAS	**DESCRIPTION**
Major Institutions	Hospitals, colleges, and universities of regional importance with limited housing and other uses.
Industrial	Areas of industrial zoning outside Manufacturing and Industrial Centers.
Parks & Open Space	City-owned parks and natural areas.
Cemeteries	Cemeteries.

Figure 2
Future Land Use Map

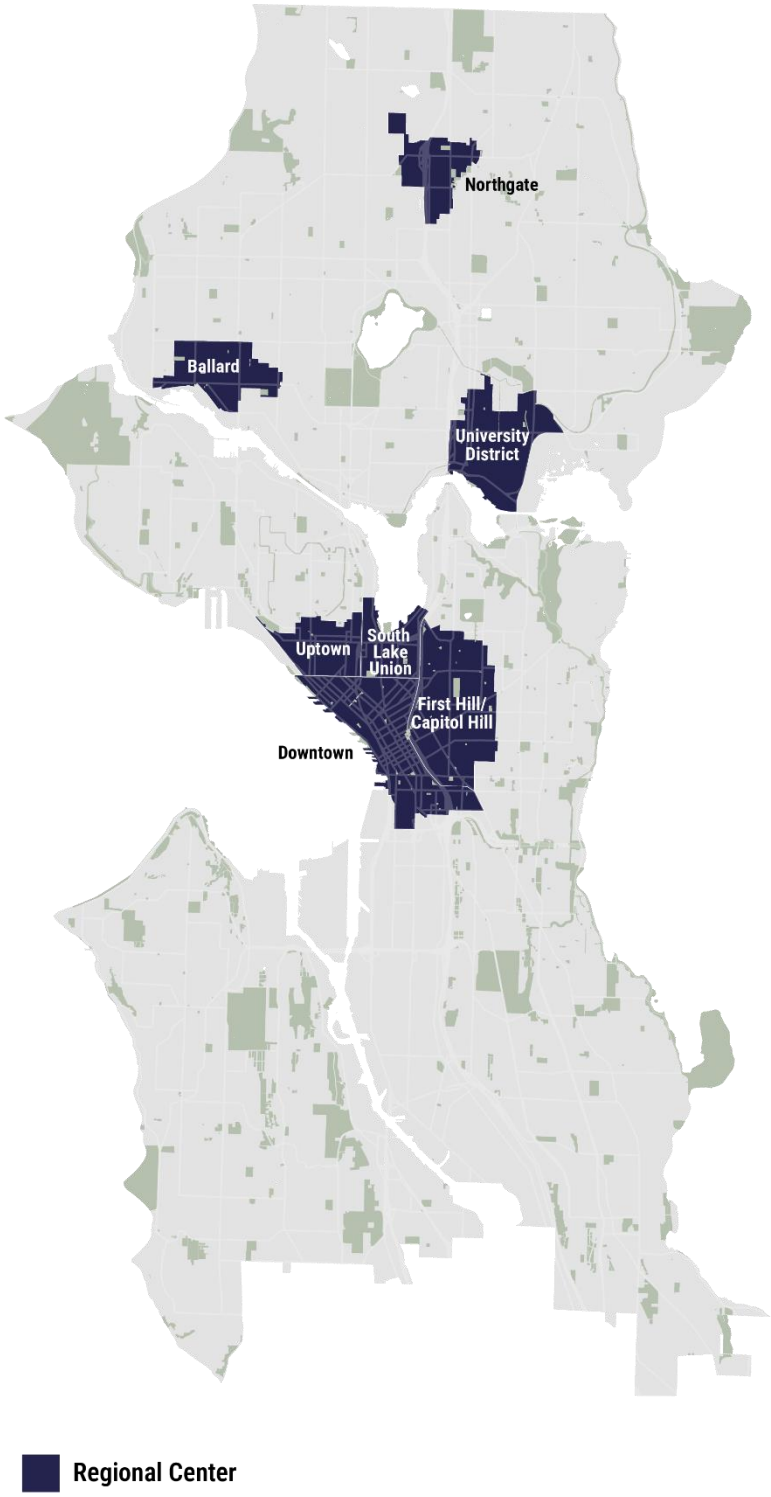


Regional Centers

Regional Centers (previously referred to as Urban Centers in the Seattle 2035 Comprehensive Plan) are the densest Seattle neighborhoods. They are places of regional importance with substantial housing, office, retail, institutional, and/or cultural and entertainment uses along with access to regional transit. Regional Centers include Downtown, South Lake Union, First Hill/Capitol Hill, Uptown, the University District, Northgate, and Ballard. These places contain some of the region's largest centers for business, commerce, and tourism and are hubs in the regional transportation network, especially high-capacity transit. To support this role and allow our region to grow, Regional Centers are planned to accommodate a substantial share of the city's growth.

Regional Centers are planned to align with Regional Growth Centers designations by the Puget Sound Regional Council and the King County Growth Management Planning Council. As such, they meet regional criteria for size, mix of uses, transportation, and other characteristics. Subarea plans for each Regional Center are developed and updated over time and adopted as part of the City's Comprehensive Plan.

Figure 3
Regional Center Map (right)



POLICIES

GS 3.1 Designate as Regional Centers places of regional importance due to the presence of substantial housing, office, retail, and/or entertainment uses at higher densities and access to regional transit.

GS 3.2 Recognize and plan for the unique role and character of different neighborhoods within large regional centers, particularly Downtown.

GS 3.3 Allow a wide range of higher-density housing types in Regional Centers. High-rise tower construction may be appropriate in Regional Centers.

GS 3.4 Allow a wide range of non-residential uses in Regional Centers including office, retail, institutional, and entertainment uses. Regional Centers should contain most of Seattle's office development.

GS 3.5 Seek to ensure that Regional Centers meet Puget Sound Regional Council and Countywide Planning Policy requirements for Regional Growth Centers.

GS 3.6 Adopt subarea plans for each Regional Center that are consistent with Puget Sound Regional Council requirements and responsive to the unique challenges, opportunities, and community needs within each center.

GS 3.7 Plan to accommodate growth over twenty years in each Regional Center that includes at least the numbers of new housing units and new jobs shown in Figure 4.

Figure 4
Estimated Regional Center Growth 2024–2044

Regional Centers	*New Housing Units*	*New Jobs*
Downtown	13,500	60,000
First Hill/Capitol Hill	9,000	3,000
University District	4,000	3,500
Northgate	2,000	2,500
South Lake Union	4,500	25,500
Uptown	3,500	2,500
Ballard	5,000	4,000

Urban Centers

Urban Centers (previously referred to as Urban Villages in the Seattle 2035 Comprehensive Plan) are walkable mixed-use areas that play an important role serving surrounding neighborhoods or even the entire city. Urban Centers include a wide range of housing, jobs, shops and services, and access to regional or local transit. These areas are destinations for residents in different districts of Seattle due to the high concentration of shops, restaurants, and businesses. Urban Centers are generally served with high-quality transit and biking and walking infrastructure. Over time, these areas have added a significant share of the city's new housing supply, primarily mid-rise multifamily housing, and are expected to continue in this role into the future.

Urban Centers are planned to align with the Countywide Centers designation by the King County Growth Management Planning Council. As such, they meet criteria in the Countywide Planning Policies for size, mix of uses, transportation, and other characteristics.

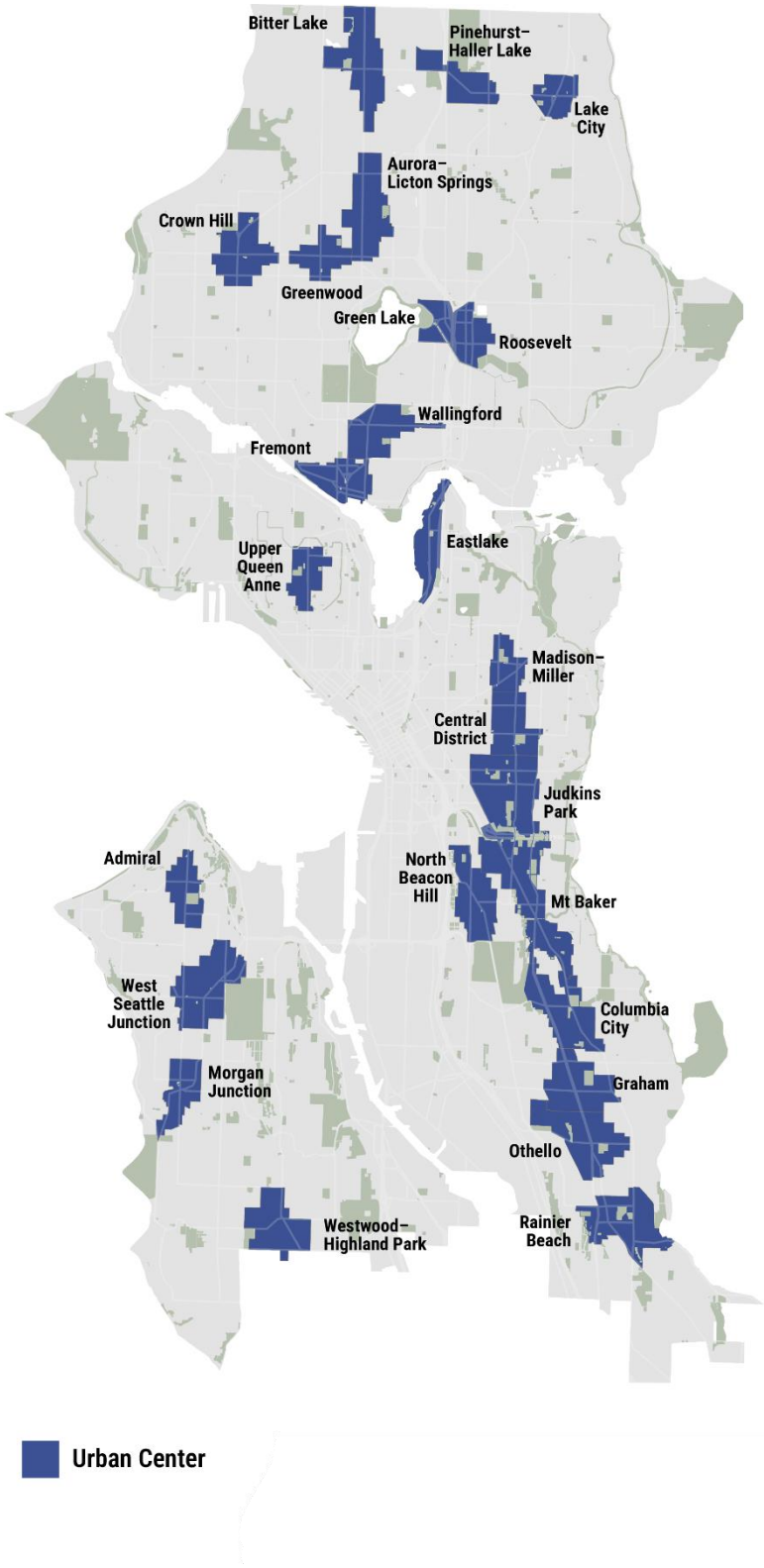


Figure 5
Urban Center Map (right)

POLICIES

GS 4.1 Designate as Urban Centers those areas that play an important citywide role with a wide range of housing, jobs, shops and services, and access to regional or local transit. Areas with light rail stations outside Regional Centers should generally be designated as Urban Centers unless major topographic constraints or industrial zoning would limit growth in these areas.

GS 4.2 Seek to ensure that Urban Centers meet King County's criteria for Countywide Centers.

GS 4.3 Allow a wide range of housing types in Urban Centers. Urban Centers should generally allow buildings of 3 to 8 stories. Buildings greater than 8 stories may be appropriate in Urban Centers near significant transit investments, especially light rail stations, or near existing concentrations of amenities and services.

GS 4.4 Allow a wide range of non-residential uses including office, retail, institutional, and entertainment uses in Urban Centers. Major office developments are appropriate in Urban Centers but should be encouraged primarily near light rail stations.

GS 4.5 Allow various sizes of Urban Centers based on local conditions, but generally include those areas within a 10-minute walk (half-mile) of a current or future light rail station or 8-minute walk (2,000 feet) of the central intersection if no light rail exists.

Figure 6
List of Urban Centers

Admiral

Aurora–Licton Springs

Bitter Lake

Central District

Columbia City

Crown Hill

Eastlake

Fremont

Graham

Green Lake

Greenwood

Judkins Park

Lake City

Madison–Miller

Morgan Junction

North Beacon Hill

North Rainier

Othello

Pinehurst–Haller Lake

Rainier Beach

Roosevelt

Upper Queen Anne

Wallingford

West Seattle Junction

Westwood–Highland Park

Neighborhood Centers

Neighborhood Centers are places with a diversity of housing options located around a locally focused commercial core and/or access to frequent transit. Neighborhood Centers generally represent the core of a neighborhood providing shops, services, grocery stores, restaurants, and other businesses that residents need to access on a regular basis. These areas provide an opportunity for people to access everyday needs within a short walk or bike ride from their homes. Allowing more housing in these areas can increase opportunities to live in complete connected neighborhoods, strengthen local business districts, and help people reduce reliance on cars.

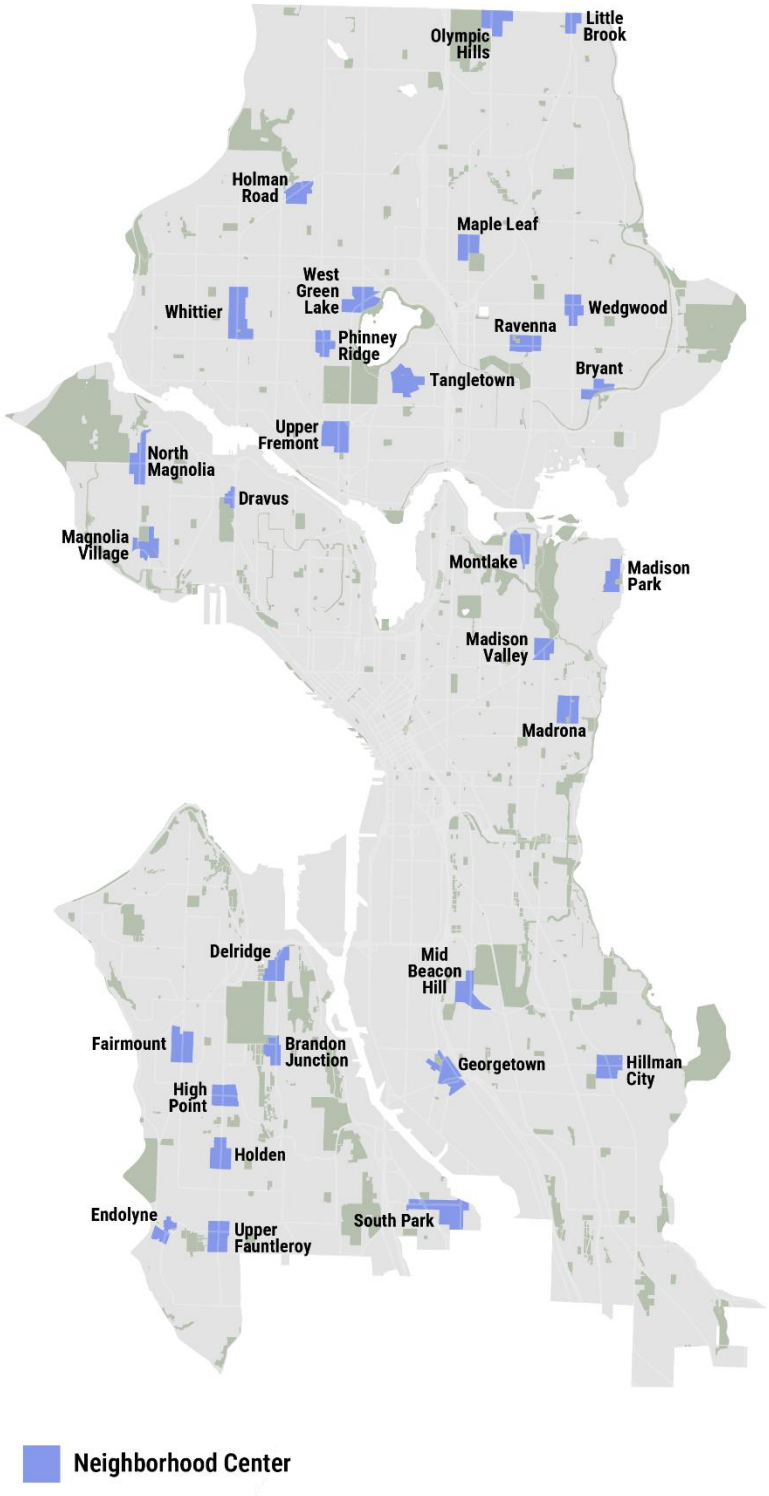


Figure 7
Neighborhood Center Map (right)

POLICIES

GS 5.1 Designate as Neighborhood Centers areas with a locally focused commercial core and/or access to frequent transit where diverse housing options could allow more people to live within walking distance of shops, services, transit, and amenities.

GS 5.2 Allow a diversity of housing, institutional, service, retail, and entertainment uses in Neighborhood Centers. Focus non-residential uses primarily in the core of the center. Generally, avoid allowing major office developments in these areas.

GS 5.3 Zoning in Neighborhood Centers should generally allow buildings of 3 to 6 stories, especially 5- and 6-story residential buildings to encourage the development of apartments and condominiums.

GS 5.4 Determine the boundaries of Neighborhood Centers based on local conditions, but generally include areas within a 3-minute walk (800 feet) of the central intersection or bus rapid transit stop.

Figure 8
List of Neighborhood Centers

Brandon Junction	Holman Road	Olympic Hills
Bryant	Little Brook	Phinney Ridge
Delridge	Madison Park	Ravenna
Dravus	Madison Valley	South Park
Endolyne	Madrona	Tangletown
Fairmount	Magnolia Village	Upper Fauntleroy
Georgetown	Maple Leaf	Upper Fremont
High Point	Mid Beacon Hill	Wedgwood
Hillman City	Montlake	West Green Lake
Holden	North Magnolia	Whittier

Urban Neighborhoods

Urban Neighborhoods are places outside centers that are primarily comprised of residential development. While lacking the larger business districts located in centers, Urban Neighborhoods may provide opportunities for mixed-use and commercial development along major arterial streets with access to frequent transit. They may also include at-home businesses, corner stores, and other non-residential uses located throughout to support small business and institutions and provide opportunities for ready access to everyday needs.

Over the next 20 years and beyond, Urban Neighborhoods represent an opportunity to add more diverse housing options in all neighborhoods. By providing new options to add middle housing, such as duplexes, triplexes, fourplexes, and cottage housing, across the city and apartments near transit, Urban Neighborhoods will contribute to making Seattle a more affordable and racially inclusive city.

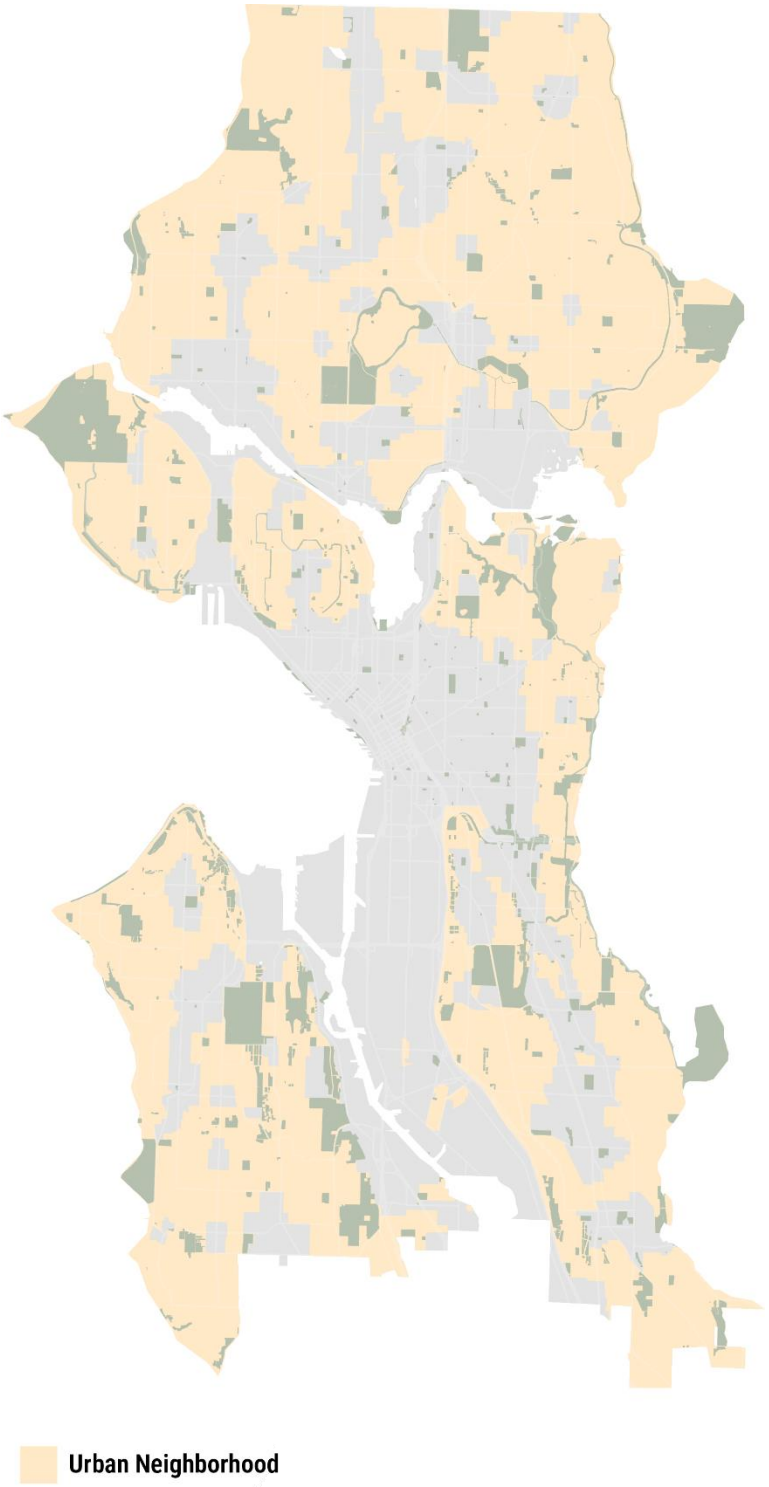


Figure 9
Urban Neighborhood Map

POLICIES

GS 6.1 Designate as Urban Neighborhood those areas outside centers that are appropriate for primarily residential development with limited non-residential uses.

GS 6.2 Allow a mix of lower-scale housing types, generally up to 3 stories, such as detached homes, duplexes, triplexes, fourplexes, sixplexes, stacked flats, and cottage housing throughout Urban Neighborhoods.

GS 6.3 Allow moderate-scale housing of 4 to 6 stories in areas currently zoned for such housing and along arterials where zoned densities may be increased to provide more housing options near frequent transit.

GS 6.4 Allow a range of commercial and mixed-use development on major streets and smaller-scale non-residential uses such as small institutions, corner stores, and at-home businesses throughout Urban Neighborhood areas.

Manufacturing and Industrial Centers

Manufacturing and Industrial Centers (MICs) are areas of concentrated industrial activity with limited retail, office, and residential uses that primarily serve industrial business and workers. Seattle has two MICs: Greater Duwamish MIC and Ballard–Interbay–Northend MIC. Both MICs are places of regional importance due to the presence of industrial businesses in a range of sizes and major transportation facilities such as the container port, marinas, and rail infrastructure.

MICs are regionally designated by the Puget Sound Regional Council and the Growth Management Planning Council. This means they meet regional criteria for size, mix of uses, transportation, and other characteristics. Subarea plans for each MIC are developed and updated over time and adopted as part of the City's Comprehensive Plan.

Figure 10
Manufacturing and Industrial Center Map

POLICIES

GS 7.1 Designate as Manufacturing and Industrial Centers areas that meet criteria for designation as MICs adopted by the Puget Sound Regional Council and the Growth Management Planning Council and have the following characteristics:

- Relatively flat terrain that allows for efficient industrial processes

- Reasonable access to the regional highway, rail, air, and/or waterway systems for transportation of goods
- Presence of significant manufacturing, warehousing, and distribution uses
- Transitions between industrial and non-industrial areas that allow for a range of industrial activities at a scale compatible with non-industrial areas
- Sufficient development capacity to accommodate a minimum of ten thousand jobs

GS 7.2 Establish boundaries for MICs that generally include continuous areas of primarily industrial use and consider natural barriers like highways and waterways and transitions to neighboring uses.

GS 7.3 Prioritize land that is proximate to irreplaceable industrial infrastructure such as deep-water ports, rail, and regional highways for continued industrial use.

GS 7.4 Allow a wide variety of manufacturing and industrial uses in MICs to support the retention and expansion of existing industrial businesses and provide opportunities for the creation of new businesses consistent with the character of industrial areas.

GS 7.5 Maintain manufacturing and industrial activity as the primary use in MICs.

GS 7.6 Allow limited commercial uses that are compatible with the primarily industrial nature of MICs.

GS 7.7 Plan to accommodate growth over twenty years in each MIC that attains at least the numbers of new jobs shown in Figure 11.

Figure 11
Estimated Manufacturing and Industrial Center Growth 2024–2044

MIC	Estimated New Jobs
Greater Duwamish	12,500 jobs
Ballard–Interbay–Northend	6,000 jobs

Major Institutions

The Major Institution place type includes the campuses of regionally important hospitals, colleges, and universities that may also include limited housing and other uses. The geography of this place type is limited to areas outside centers where institutions have worked with the City to develop Major Institution Master Plans. These plans allow for the creation of area-specific regulations that balance the importance of accommodating major institutions with managing impacts on adjacent areas.

POLICIES

GS 8.1 Designate as Major Institutions the campuses of regionally important hospitals, colleges, and universities that develop Major Institution Master Plans.

GS 8.2 Allow Major Institution Master Plans to guide development in these areas, rather than the underlying zoning.

GS 8.3 Allow housing and limited commercial uses within the Major Institution place type, whether or not they are directly related to the Major Institution, to address the needs of workers and students as well as other people who want to work, learn, or live in the area.

GS 8.4 Prioritize growth within existing Major Institutions boundaries over the expansion of established boundaries.

Parks and Open Space

The Parks and Open Space place type includes City-owned developed parks and natural areas. This place type is different than other place types as it is primarily intended to describe existing conditions rather than desired future land use change outcomes.

POLICIES

GS 9.1 Designate as Parks and Open Space those City-owned areas currently being used as parks or open space.

GS 9.2 Maintain park and open space uses as the primary use in the Parks and Open Space place type.

GS 9.3 Allow housing in the Parks and Open Space place type only where it currently exists or is located within a development containing a park and open space use such as a community center or pool.

GS 9.4 Allow limited commercial and institutional uses in the Parks and Open Space place type within existing buildings or where it could activate park and open space uses.

Area Planning

DISCUSSION

The Comprehensive Plan provides broad *citywide* direction for the future of Seattle as the city grows over the next several decades. To fulfill the vision of this Plan and implement the growth strategy, the City also undertakes more focused planning in our Regional Centers, Urban Centers, transit station areas, and other neighborhoods. Area plans are intended to provide more detailed and actionable direction on the full range of policy areas reflected in this Plan, such as land use, housing, transportation, public spaces, climate resilience, and more. A plan for a specific area within the city reflects its unique characteristics and needs while recognizing the role that each place will play in the overall growth strategy.

The City advances area planning through focused initiatives such as subarea planning for Regional Centers, including Downtown, Uptown, South Lake Union, First Hill/Capitol Hill, University District, Ballard, and Northgate, which are home to a significant share of Seattle's residents and workers and locations that are intended to accommodate a significant share of Seattle's future growth. Another key focus area is station area planning for equitable transit-oriented development, particularly around new Sound Transit stations.

Area planning reflects a commitment to equitable growth and development across the city. By centering a diversity of community voices in the area planning process, we can accommodate the needs of all stakeholders in a growing, diverse population.

GOAL

GS G10 Regional Centers, Manufacturing and Industrial Centers, station areas, and other priority areas in the city will have updated area plans guiding City and community actions to create and sustain equitable and resilient communities.

POLICIES

GS 10.1 Develop and adopt subarea plans for Regional Centers and Manufacturing and Industrial Centers.

GS 10.2 Develop station area plans for high-capacity transit station areas and surrounding communities.

GS 10.3 Identify locations and prioritize resources for area planning with consideration of designated Regional and Urban Centers, areas with high risk of displacement and/or low access to opportunity, areas experiencing major investments in transit or other capital facilities, and areas impacted by significant climate or other environmental factors.

GS 10.4 Apply an inclusive process in all area planning efforts that prioritizes equity-driven community engagement and centers the voices of marginalized and communities.

GS 10.5 Adopt processes that increase transparency and accountability in the development and implementation of area plans.

GS 10.6 Develop area plans that reflect the unique characteristics and local vision in each community to become more equitable, vibrant, and resilient in the future.

GS 10.7 Develop and implement strategies, identified in partnership with affected communities, to achieve equitable transit-oriented development in areas at risk of displacement that have existing or planned high-capacity transit facilities.

GS 10.8 Ensure area plans are consistent with and implement the vision in the Comprehensive Plan and are coordinated with and reflect other City plans and strategies.

Annexation

DISCUSSION

Several areas of unincorporated King County lie immediately south of the Seattle city limits. King County currently provides services to these areas. The state's Growth Management Act (GMA) anticipates that all areas within the county's urban growth boundary will eventually be annexed or incorporated and become part of a city. Generally, cities are considered better able to raise the revenue needed to meet local community needs and better positioned to plan for and invest in local communities. The annexation process, which is a collaboration of city, county, and community stakeholders, is informed by local input and analysis of service needs, costs, and resources.

The Countywide Planning Policies have designated three Potential Annexation Areas (PAAs) that Seattle has indicated an intention to annex into the city sometime in the future. Figure 12 shows the locations Seattle has identified as PAAs, the largest of which is the North Highline PAA.

GOAL

GS G11 Seattle has established a process for annexation of all Potential Annexation Areas through a negotiated process that meets the needs of the City and affected residents.

POLICIES

GS 11.1 Identify unincorporated areas for potential annexation that have access, or can easily be connected, to City services.

GS 11.2 Cooperate with adjacent jurisdictions, as needed, in order to reach equitable and balanced resolutions about jurisdictional boundaries for the remaining unincorporated areas abutting city limits and ensure any boundary-change agreements will result in an equitable distribution of revenues and costs, including asset transfer and the development, maintenance, and operation of facilities.

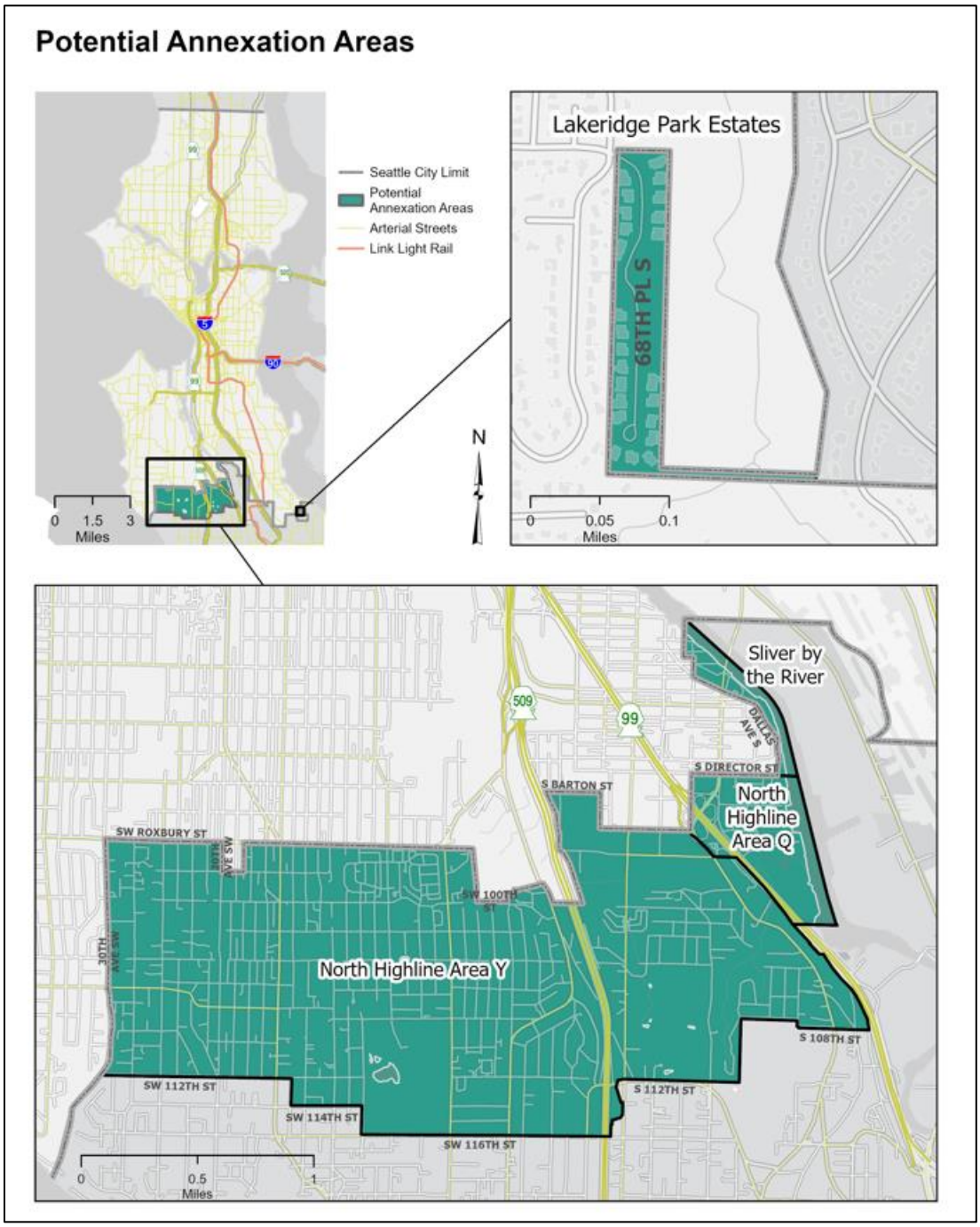
GS 11.3 Use tools and strategies to meet community needs in PAAs, such as transferring permitting authority, service and infrastructure financing, and identifying appropriate funding sources.

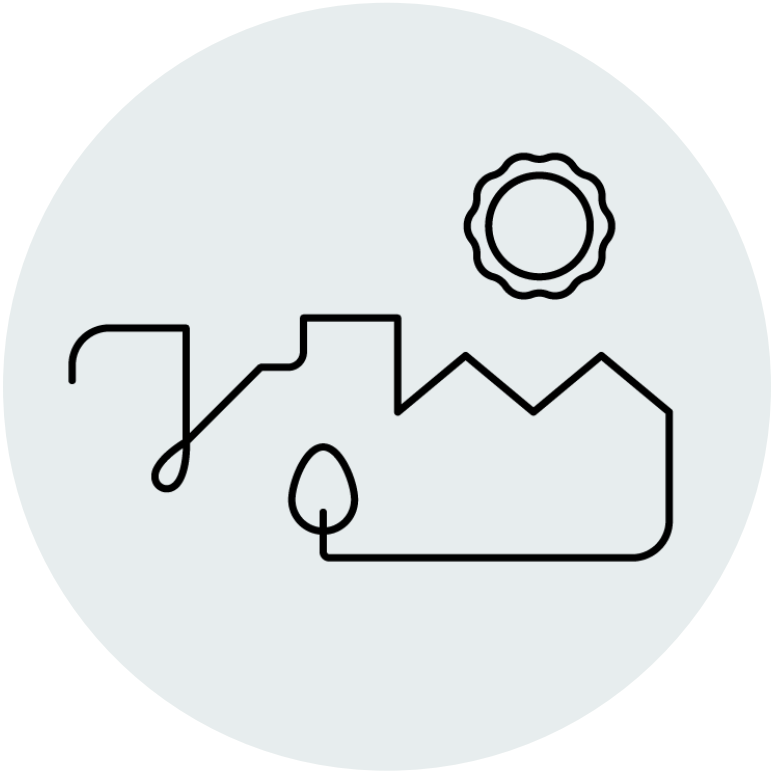
GS 11.4 Work with King County to establish pre-annexation agreements that identify mutual interests and ensure coordinated planning and compatible development until annexation is feasible.

GS 11.5 Collaborate with King County to develop a process for future annexation of Seattle's PAAs that can be achieved within the current 20-year planning period, including a timeframe for annexation of roadways and shared streets within or between cities, but still under King County jurisdiction.

GS 11.6 Consider annexation requests by the residents of unincorporated areas and engage communities within and adjacent to PAAs in the annexation planning process to ensure that the desires and needs of the community, particularly marginalized communities, are centered in the process.

Figure 12
Potential Annexation Areas





Land Use

Introduction

The Land Use element provides guidance on how the City's zoning and development regulations should shape new development. The goals and policies in this element are designed to meet a range of City objectives, including and especially the implementation of the growth strategy as described in the Growth Strategy element and depicted in the Future Land Use Map.

Zoning and development regulations shape the design and limit the size and allowed uses of new buildings in Seattle. These regulations are critical to shaping Seattle's growth but can also have unintended consequences if they significantly increase the cost of new housing, make it difficult for new businesses to grow, or result in designs that conflict with our City goals. This element outlines our goals for these regulations and provides guidance to maximize their benefits while minimizing unintended impacts.

Overarching Goals and Policies

DISCUSSION

The purpose of this section is to establish the goals and policies that inform all the following sections.

GOAL

LU G1 Zoning and development standards encourage and shape growth and development to:

- Implement the vision contained in this Plan.
- Create housing that works for households of all types and income levels.
- Create spaces for the diverse needs of businesses and institutions.
- Encourage high-quality, well-designed, and sustainable buildings.
- Protect and enhance the natural environment.
- Mitigate the impacts of new construction.

POLICIES

LU 1.1 Support a wide variety of housing options in all non-industrial neighborhoods, including lower-cost market-rate and income-restricted homes.

LU 1.2 Support a wide variety of businesses and institutions in neighborhoods throughout Seattle, especially those that meet the everyday needs of residents.

LU 1.3 Apply development standards such that new uses and buildings protect public health and safety and minimize impacts on adjacent homes and businesses.

LU 1.4 Encourage development that contributes to vibrant, equitable, complete, and walkable neighborhoods.

LU 1.5 Seek to balance the benefits of regulating land use and development with the impacts to property owners and the cost of housing and non-residential space.

LU 1.6 Seek to reduce the potential health impacts of air pollution on residential populations and other sensitive uses near corridors with high volumes of vehicle traffic, the King County Airport, major rail yards, truck routes, and point sources of pollution.

LU 1.7 Review future legislative rezones to determine if they pose a risk of increasing the displacement of residents, especially marginalized communities, and the businesses and institutions that serve them.

Urban Design

DISCUSSION

As Seattle changes over time, thoughtful urban design can help to enhance the aspects of its physical environment that make Seattle so appealing to residents and visitors alike. These include well-defined and diverse mixed-use neighborhoods; compact, walkable scale; proximity to nature; and attractive parks, streets, and public spaces. In a growing city, urban design can help seamlessly integrate the new with the old, producing positive results with design approaches that put people first and reflect Seattle's diverse neighborhoods, populations, and natural features.

The policies included in this section outline the City's objectives for the design of buildings, sites, and public space. The policies are separated into three specific areas of focus: Natural Environment, Built Environment, and Public Spaces. More detailed direction for individual projects can be found in the Land Use Code's regulations and in the City's design guidelines.

The policies in this element are not intended to be used for reviewing individual projects. Rather, they can help inform the changes to zoning regulations and design review processes which more directly shape projects.

GOAL

LU G2 Seattle's unique character and sense of place, including its natural setting, history, design quality, and community identity, is maintained and enhanced as the city grows and changes.

POLICIES

Natural Environment

LU 2.1 Encourage the protection, restoration, and celebration of Seattle's natural features and landforms such as bluffs, beaches, streams, and forests.

LU 2.2 Design public facilities to emphasize physical and visual connections to Seattle's natural surroundings with special attention to public vistas of shorelines, Mount Rainier, the Olympic Mountains, and the Cascade Range.

LU 2.3 Encourage design that recognizes natural systems, integrates ecological functions such as stormwater filtration or retention, and reduces hazards to wildlife from the built environment.

LU 2.4 Provide both physical and visual public access to streams, lakes, and Puget Sound.

LU 2.5 Encourage landscaping and other urban design interventions for sites with a substantial number of impervious surfaces such as surface parking lots, rooftops, and freeway edges.

LU 2.6 Promote, in consultation with Tribes, the use of native, edible, and culturally significant plants for landscaping to emphasize the region's natural identity and Indigenous culture and to foster environmental health.

LU 2.7 Encourage the preservation and expansion of the tree canopy throughout the city for the aesthetic, health, and environmental benefits trees provide and focus public tree planting programs on residential and mixed-use areas with the least tree canopy in order to distribute the benefits equitably.

LU 2.8 Recognize the role that waterways, forests, and other natural areas play in Indigenous practice, culture, and community and work with Indigenous communities and Tribes to improve access to and design of these spaces.

Built Environment

LU 2.9 Encourage the preservation of characteristics and features that contribute to communities' multiple identities, including in areas of historic, architectural, cultural, or social significance.

LU 2.10 Design public infrastructure and private development to contribute to the visual interest, walkability, cultural heritage, and accessibility of neighborhoods.

LU 2.11 Design streets that reflect a particular street's function, right-of-way width, adjoining uses, and role within a citywide system.

LU 2.12 Seek opportunities for new pedestrian and bike connections to knit together neighborhoods. Support efforts to use lids and other connections over highways that separate neighborhoods, especially when such lids provide opportunities to reconnect neighborhoods and provide amenities such as affordable housing, open spaces, or pedestrian and bike connections to transit stations.

LU 2.13 Design neighborhoods to be walkable and accessible by enhancing pedestrian connections, public open spaces, walking and biking infrastructure, and wayfinding, and by encouraging buildings with retail and active uses that flank the sidewalk.

LU 2.14 Consider the value of designing buildings and public spaces that maximize use of natural light and provide protection from inclement weather.

LU 2.15 Encourage the use of land, rooftops, and other spaces for urban food production.

LU 2.16 Consider promoting varied building forms to enhance attractive and walkable neighborhoods.

LU 2.17 Consider taller building heights in key locations to define activity centers, such as near light rail stations in Regional and Urban Centers.

LU 2.18 Consider the impacts of tall buildings on public views and on sunlight in public streets and parks when defining upper-level building standards such as lot coverage, tower spacing, or setbacks.

Public Spaces

LU 2.19 Encourage street designs that prioritize pedestrians, provide public space, support business districts, and create space for community events.

LU 2.20 Promote well-defined and accessible outdoor spaces that are designed for a range of potential users and that are well integrated with adjoining buildings and spaces.

LU 2.21 Design public spaces that consider the nearby physical context and the needs of the community and specific user groups, particularly those communities that have been traditionally underrepresented in public space design.

LU 2.22 Design public spaces so they feel safe and inviting to a wide variety of people.

Uses

DISCUSSION

The City regulates how land is used through zoning. Each zone has a specific set of rules defining what types of uses are allowed in that area. Regulations ensure we focus jobs, housing, and services in the places that match our vision, and allow us to address potential conflicts that can occur between different types of uses. As we strive to be a city where people can walk, bike, and roll to meet their everyday needs, use regulations can help to create neighborhoods with a variety of uses while minimizing the conflicts between them.

GOAL

LU G3 Use regulations are designed to:

- Allow a variety of housing types to accommodate housing choices for households of all types and income levels.
- Support a wide range of employment-generating activities to provide jobs for a diverse population, as well as a variety of services for residents and businesses.
- Accommodate the full range of public services, institutions, and amenities needed to support a racially and economically diverse, sustainable urban community.
- Guide new development to locations consistent with the growth strategy.
- Minimize conflicts between different uses.

POLICIES

LU 3.1 Allow or prohibit uses in each zone based on the zone's intended function and on the expected impacts of a use on other properties in the zone and the surrounding area. Generally, allow a broad mix of compatible uses in centers.

LU 3.2 Include provisions to potentially allow as conditional uses those activities that may be beneficial to an area but that also require additional measures to avoid potential impacts on sensitive environments or on other permitted uses.

LU 3.3 Allow residential use outright or as a conditional use in all zones except industrial zones and those shoreline areas where residential uses may conflict with the intended function of the shoreline environment.

LU 3.4 Allow a wide range of shops and services in neighborhoods throughout Seattle to support a growing population and enable residents in all neighborhoods to walk, roll, or bike to their everyday needs.

LU 3.5 Allow nonconforming uses to be maintained and enhanced, but generally not to be expanded, and encourage them to become more conforming over time.

LU 3.6 Identify uses that support equitable development and take steps to remove regulatory barriers to and increase the feasibility of those uses in neighborhoods throughout Seattle.

General Development Standards

DISCUSSION

Development standards are the rules that define the size and design of buildings, structures, and other improvements. Standards often include limits on building height, setbacks from property lines, maximum lot coverage, and requirements for the external and internal design of the building. Development standards help shape the look and feel of Seattle's neighborhoods as they grow. They help ensure new buildings contribute to the overall neighborhood and advance city goals relating to public health and safety, utility service provision, open space, environmental stewardship, energy efficiency, and other topics.

GOAL

LU G4 Development standards effectively guide building design to serve each zone's function; produce the scale and building forms desired; protect public health, safety, and welfare; protect the environment; and address the need for new housing and commercial space.

POLICIES

LU 4.1 Allow for flexibility in development standards so existing structures can be maintained and improved and new development can respond to site-specific conditions.

LU 4.2 Develop and apply development standards that provide predictability regarding the allowed intensity of development and expected development types for each zone.

LU 4.3 Control the massing of structures to make them compatible with the area's planned scale, provide for open space on a site, and allow the building to receive adequate natural light.

LU 4.4 Use maximum height limits to maintain the desired scale of development, address varied topographic conditions, and limit public view blockage. In certain Downtown zones and in industrial zones, heights for certain types of development may be unlimited.

LU 4.5 Consider opportunities to create gradual transitions in allowed building height and scale within blocks, across alleys, and between areas of higher density and lower density when modifying maximum height limits.

LU 4.6 Provide for residents' recreational needs on development sites by encouraging private or shared amenity areas such as rooftop decks, balconies, ground-level open spaces, or enclosed spaces.

LU 4.7 Use setbacks in residential areas as needed to allow for adequate light, air, and ground-level open space and promote compatibility with the desired development pattern.

LU 4.8 Use tree requirements to preserve and enhance the City's physical, aesthetic, and cultural character and to enhance the value of trees in addressing stormwater management, pollution reduction, and heat island mitigation.

LU 4.9 Enhance the visual quality of an area through standards for screening and landscaping appropriate to each zone.

LU 4.10 Establish standards for drainage, flooding, and stormwater runoff to mitigate or cleanse discharges that could pollute our waters.

LU 4.11 Regulate signage to encourage reasonable identification of businesses and to communicate information of community interest while limiting visual clutter, protecting the public interest, and enhancing the city's appearance and safety.

LU 4.12 Establish maximum permitted noise levels that account for both the function of the noise producing area and the function of areas where the noise may be heard, in order to reduce the health hazards and nuisance factors associated with some uses.

LU 4.13 Identify uses as major noise generators based on the noise associated with certain equipment operations or the nature of a particular activity and regulate these uses to reduce noise to acceptable levels.

LU 4.14 Regulate activities that generate air emissions, such as dust, smoke, solvent fumes, or odors, to maintain and encourage successful commercial and industrial activities while protecting employees, clients, nearby residents, the general public, and the natural environment.

LU 4.15 Protect public views through:

- Zoning that considers public views, with special emphasis on shoreline views
- Development standards, such as setbacks that help to reduce impacts on public views
- Environmental policies that protect specified public views, including views of mountains, major bodies of water, designated landmarks, and the Downtown skyline

LU 4.16 Require higher-density development to offset its impacts through mechanisms such as incentives for landmark preservation, open space amenities, and below-market cost housing.

LU 4.17 Implement policies and programs that result in the seismic retrofit of buildings to minimize damage, death, and displacement after an earthquake while also minimizing the impact of retrofits on the cost of housing.

LU 4.18 Seek excellence in new development through a design review process that complements development regulations and allows for flexibility in the application of development standards to achieve quality design.

Off-Street Parking

DISCUSSION

Parking is found on both public and private property. Policies regarding on-street parking are covered in the Transportation element.

Off-street parking, which is shaped by land use regulations, can help to reduce the competition for on-street parking that occurs in certain areas due to the large number of trips made by car or truck. However, it can also encourage vehicle travel; negatively impact the design of buildings, on-site open spaces, and adjacent streets; and can significantly increase the cost of construction. Moreover, some people find it important to have their own off-street parking space while other people choose to live car-free and don't want to pay more for a building with parking.

Because of the potential positive and negative impacts of requiring off-street parking and the diverse needs of individual households, the City's approach to regulating parking varies in different areas and for different uses. For some areas and uses, the City requires a minimum amount of parking; while for other areas and uses, it limits the maximum amount of parking allowed.

Where parking is required, the amount of parking is generally set to avoid requiring parking that will be poorly utilized. Additionally, the City regulates the location of parking spaces and access to avoid impacts on the street and sidewalk.

GOAL

LU G5 Off-street parking regulations balance multiple goals including:

- Addressing parking demand.
- Reducing reliance on automobiles.
- Reducing greenhouse gas emissions.
- Improving public health and safety.
- Minimizing construction costs to reduce the cost of housing.
- Reducing impacts on the street and sidewalk.
- Creating attractive and walkable environments and public spaces.
- Promoting economic development throughout the city.

POLICIES

LU 5.1 Use minimum parking requirements where appropriate to balance the goals of allowing accessibility, reducing competition for on-street spaces, discouraging underused parking facilities, providing for electric vehicle charging, minimizing impacts to the cost of housing, and increasing the use of public transit, carpools, walking, and bicycles as alternatives to the use of single-occupant vehicles.

LU 5.2 Set minimum parking requirements, where they are implemented, to discourage underused parking facilities, even if occasional spillover parking could result. Require fewer parking spaces per business when several businesses share customer parking, thereby enabling customers to park once and walk to numerous businesses.

LU 5.3 Avoid setting minimum parking requirements for housing in Regional and Urban centers and areas well-served by transit.

LU 5.4 Use maximum parking requirements where appropriate to discourage single-occupancy-vehicle travel where high levels of pedestrian, bicycle, and transit accessibility make many trips possible without a car.

LU 5.5 Allow shared off-site parking facilities for more efficient use of parking and to provide the flexibility to develop parking on a site separate from the development site.

LU 5.6 Limit the impacts of off-street parking on pedestrians and the surrounding areas by restricting the number and size of automobile curb cuts and by generally requiring alley access to parking when there is an accessible, surfaced alley.

LU 5.7 Prohibit most street-level parking between buildings and the street in residential zones and pedestrian-oriented commercial zones in order to maintain an attractive and safe street-level environment, facilitate the movement of pedestrian and vehicular traffic, minimize adverse impacts on nearby areas and structures, and, where appropriate, maintain or create continuous street fronts.

LU 5.8 Locate off-street parking facilities to minimize impacts on the pedestrian environment, especially in areas designated for active pedestrian use.

LU 5.9 Prohibit principal-use parking in places where that parking would be incompatible with the area's intended function.

LU 5.10 Discourage the development of major stand-alone park-and-ride facilities within Seattle. Additions to park-and-ride capacity could be considered:

- At the terminus of a major regional transit system.
- Where opportunities exist for shared parking.
- Where alternatives to automobile use are particularly inadequate or cannot be provided in a cost-effective manner.

LU 5.11 Encourage bicycle parking in new residential construction to promote bicycle ownership and use.

Public Facilities and Small Institutions

DISCUSSION

Throughout Seattle, our communities are dotted with facilities that provide needed services to residents. These include schools, fire and police stations, and other buildings that serve special functions that require them to be different from other buildings in the same zone. For instance, fire stations may need extra room for trucks and schools need to be much larger than the homes around them. Similar issues sometimes arise with facilities and small institutions not operated by the public sector, such as churches, private schools, and nursing homes.

GOAL

LU G6 Public facilities and small institutions are designed and located so that they meet the goals of their mission and are generally compatible with the function and scale of the surrounding area, even if some deviation from certain regulations is necessary.

POLICIES

LU 6.1 Regulate public facilities and small institutions to promote compatibility with other development in the area.

LU 6.2 Allow public facilities and small institutions to depart from development standards if necessary to meet their particular functional requirements, while maintaining general design compatibility with the surrounding area. Consider providing greater flexibility for schools in recognition of their important role in the community.

LU 6.3 Allow standards to be modified for required off-street parking associated with public facilities and small institutions based on the expected use and characteristics of the facility and the likely impacts on surrounding parking and development conditions, and on existing and planned transportation facilities in the area.

LU 6.4 Encourage land and buildings no longer used as schools to be put to other uses not otherwise permitted in the applicable zone.

LU 6.5 Provide a process for identifying and siting essential public facilities, including facilities that are not already identified in state law. A public facility should be

considered essential if it provides or is necessary to provide a public service and is difficult to site. A public facility should be considered difficult to site if any of the following conditions exist:

- The public facility needs a specific type of site of such a size, location, or availability of public services, for which there are few choices.
- The public facility needs to be located near another public facility or is an expansion of an essential public facility at an existing location.
- The public facility has, or is generally perceived by the public to have, significant adverse impacts that make it difficult to site.
- Use of the normal development review process would effectively preclude the siting of an essential public facility.
- Development regulations require the proposed facility to use an essential public facility siting process.

LU 6.6 Provide a process to allow the siting of essential public facilities in locations where they might not otherwise be allowed that considers the following:

- Interjurisdictional analysis
- Financial analysis
- Special purpose districts
- Measures to facility siting
- Analysis of alternatives to the facility

LU 6.7 Provide a process to allow the waiver of regulations to allow the siting of an essential public facility.

LU 6.8 The City may impose conditions or mitigation to reduce or eliminate adverse environmental impacts as part of the permitting process as part of the siting of local, regional, state, or federal essential public facilities.

LU 6.9 Work cooperatively with King County, the State, and/or other cities to site essential public facilities.

Telecommunications Facilities

DISCUSSION

Telecommunications facilities have become essential infrastructure to support access to key services and opportunities. Cell phone and mobile broadband service providers and broadcast radio and television stations require equipment that can transmit their signals. This equipment usually must be placed high enough that signals can effectively distribute to the service coverage area. Telecommunications facilities are primarily regulated by federal law. AM and FM radio and VHF and UHF television transmission towers are considered major communication utilities. Minor communication facilities are generally smaller and include such things as personal wireless service and cellular communication facilities.

GOAL

LU G7 The benefits of high capacity and reliable telecommunications services are available citywide. Radio and television broadcast utilities (major communications utilities) and cellular utilities (minor communications utilities) are designed and located to support continued and improved service to the public and to address potential impacts to visual aesthetics and public health.

POLICIES

LU 7.1 Allow major communications utilities only where impacts of their size and appearance can be offset, and in a way that does not lead to an overall increase in TV and radio towers.

LU 7.2 Encourage replacing existing antennas with new antennas to achieve higher service capacity and lower levels of radio-frequency radiation at ground level.

LU 7.3 Prohibit new major communication utilities, such as radio and television transmission towers, in residential zones and in pedestrian-oriented commercial/mixed-use zones and encourage existing major communication utilities to relocate to nonresidential areas.

LU 7.4 Require major communication utilities to be developed in ways that limit impacts on nearby areas, including through development standards and design treatments that minimize visual impacts on neighboring properties and provide an overall appearance that is as compatible as possible with the uses permitted in the zone.

LU 7.5 Limit the impact minor communication utilities could have on communities by encouraging collocation of facilities and by requiring mitigation of visual and noise impacts.

Downtown Zones

DISCUSSION

Downtown is the commercial and entertainment core of our region and contains some of the densest neighborhoods in Washington state. It also contains substantial diversity in the scale and character of existing development. Downtown zones recognize the unique circumstances of the various neighborhoods of this area.

GOAL

LU G8 Downtown zones promote Downtown Seattle's unique role in the region by encouraging a high density of development, a wide diversity of residential and non-residential uses, and a vital and attractive environment that is inviting to visitors.

POLICIES

LU 8.1 Use a range of land use zones that recognize the distinct areas of Downtown that are defined by their histories and by their land use functions.

LU 8.2 Use a range of land use zones and height limits to support the existing and desired character of different areas within Downtown.

LU 8.3 Implement development standards that support desired street-level and upper-story conditions.

LU 8.4 In the core of Downtown, allow a broad range of uses and significant flexibility to switch uses in order to allow Downtown to adjust to changing conditions and to encourage a 24/7 environment.

Seattle Mixed Zones

DISCUSSION

Seattle Mixed is a zone designed to address the unique local conditions in high-density, mixed-use areas outside of Downtown. These include parts of South Lake Union, Dravus, North Rainier, University District, Uptown, Northgate, and an area next to the Rainier Beach light rail station.

GOAL

LU G9 Seattle Mixed zones support unique local conditions in high-density, mixed-use areas outside of Downtown.

POLICIES

LU 9.1 Use a range of Seattle Mixed zones and height limits to support the existing and desired character of different high-density, mixed-use areas outside of Downtown.

LU 9.2 Implement development standards that support desired street-level and upper-story conditions.

Multifamily Zones

DISCUSSION

Multifamily zones allow primarily residential development ranging from townhouses to high-rise towers.

GOAL

LU G10 Multifamily zones create areas of primarily residential development at a variety of scales that:

- Include housing suitable for a broad array of households and income levels.

- Support neighborhoods where people can walk, bike, and roll to transit, shops, services, and amenities.

POLICIES

LU 10.1 Provide a range of multifamily zones that allow development at various heights, densities, and configurations and that are well suited to the variety of specific conditions and development goals in diverse areas of the city.

LU 10.2 Establish multifamily residential use as the predominant use in multifamily areas but allow non-residential uses that help people access everyday needs within a short walk or bike from their home.

LU 10.3 Allow a variety of attached and stacked housing types to accommodate a wide diversity of households in multifamily zones, including housing that meets the needs of residents with specific needs such as families with children, multi-generational households, and older adults.

LU 10.4 Design multifamily zones to be appealing residential communities with high-quality housing and development standards that promote livability and a sense of community, including landscaping, street amenities, and, in appropriate locations, limited commercial uses that serve the neighborhood's residents.

LU 10.5 Allow high-rise multifamily zoning designations only in Regional Centers and near high-capacity transit stations, where the mix of activities offers convenient access to regional transit, a range of services and amenities, and jobs.

LU 10.6 Encourage child-friendly housing with unit sizes and layouts that work for larger households and public spaces and amenities that improve livability for families with children.

Commercial Zones

DISCUSSION

Commercial zones include both Commercial (C) and Neighborhood Commercial (NC) zones. These zones allow various commercial, institutional, and light industrial uses. Residential is allowed outright or as a conditional use depending on the zone. These zones tend to occur mostly in business districts or along busier streets.

GOAL

LU G11 Commercial zones create areas of commercial and mixed-use activity that:

- Provide a focus for the surrounding neighborhood.
- Encourage new businesses and provide stability and expansion opportunities for existing businesses.
- Accommodate residential development in livable environments.

POLICIES

LU 11.1 Provide a range of commercial zone classifications to allow different mixes and intensities of activity, varying scales of development, varying degrees of residential or commercial orientation, and varying degrees of pedestrian or auto orientation.

LU 11.2 Apply limits on the size of specific uses in commercial zones when those limits would:

- Help ensure that the scale of uses is compatible with the function of the commercial area.
- Discourage uses likely to attract significant vehicular traffic from locating in pedestrian-oriented commercial areas.
- Promote compatible land use and transportation patterns.
- Foster healthy commercial development.
- Provide opportunities for small local businesses to locate, especially in culturally relevant business districts throughout the city.

LU 11.3 Limit new drive-in businesses and accessory drive-in facilities by prohibiting them in certain areas and allowing them in other areas with development standards that address the potential for traffic impacts, pedestrian/vehicle conflicts, disruption of an area's business frontage, and the overall appearance of the commercial area.

LU 11.4 Assign height limits to commercial zones independent of the commercial zone designations but consistent with the intended intensity of development in the zone. Allow different areas within a zone to be assigned different height limits based on the need to:

- Further the growth strategy.
- Accommodate the desired functions and intensity of development.
- Accommodate desired transitions with development in adjacent areas.
- Allow more housing near transit, parks, shops, and services.

LU 11.5 Use neighborhood commercial zones to achieve:

- A compatible blend of commercial and residential uses.
- Strong, healthy business districts that reinforce a sense of place while providing essential goods, services, and livelihoods for Seattleites, especially residents who are within walking distance of these places.
- Mixes of commercial activity that are compatible with development in adjacent areas.
- Residential development that is both appealing to residents and compatible with the desired commercial function of the area.
- An active, attractive, accessible, walkable pedestrian environment with continuous commercial street frontages.

LU 11.6 Use general commercial zones to:

- Accommodate the broadest range of commercial activities, including retail uses of all sizes, small office buildings, warehouses, and light and general manufacturing facilities.
- Support auto-oriented commercial areas that serve a citywide or regional clientele where they can maintain compatible development conditions.

LU 11.7 Locate general commercial zones predominately in areas along arterials or that border industrial zones outside of regional, urban, and neighborhood centers.

Neighborhood Residential Zones

DISCUSSION

Neighborhood Residential zones generally allow lower-scale housing types, such as detached homes, duplexes, triplexes, fourplexes, sixplexes, and cottage housing. Housing types in these zones provide options for homeownership and larger units for families and other multi-person households.

GOAL

LU G12 Neighborhood residential zones create areas of relatively low-scale, primarily residential development with housing options suitable for a diversity of household types and income levels.

POLICIES

LU 12.1 Use neighborhood residential zones to encourage a range of housing types such as detached homes, duplexes, triplexes, fourplexes, sixplexes, and cottage housing.

LU 12.2 Encourage a range of housing types, sizes, and affordability levels in neighborhood residential areas, including smaller homes for individuals and homes appropriate for families with children.

LU 12.3 Allow limited nonresidential uses, such as small institutions, corner stores, and at-home businesses, in neighborhood residential areas to support small business development and enhance residents' access to everyday needs. Apply appropriate development standards for nonresidential uses in order to mitigate potential negative impacts.

LU 12.4 Use tools such as additional development capacity to promote creation of homes affordable to low-income households in neighborhood residential areas.

Industrial Zones

DISCUSSION

Seattle has a long history as the main shipping, manufacturing, and freight distribution center for the region. Those activities take place mostly in industrial zones located in the city's two Manufacturing and Industrial Centers. These industrial areas are large and generally flat. In these areas, City zoning allows industrial activity such as manufacturing, warehousing, and shipping of goods through waterways, railways, and highways. Industrial zones are an important source of living wage jobs and improve the diversity and resilience of the local and regional economy, making the local economic base more stable. Having industrial activity in the city makes Seattle less vulnerable to shifts in the economy. Due to the volume of truck traffic, the need some industrial businesses have for access to rail service, the large sites that many of those businesses need, and noise, odor, and other impacts generated by these businesses, it is important to provide separate areas for these activities.

GOALS

LU G13.1 Industrial zones provide sufficient land for industrial activity to thrive in Seattle and protect the preferred industrial function of these areas from activities that could disrupt or displace them.

LU G13.2 In industrial zones, support employment-dense emerging industries that require greater flexibility in the range of on-site uses and activities.

POLICIES

LU 13.1 Designate industrial zones generally where:

- The primary functions are industrial activity and industrial-related commercial functions.
- The basic infrastructure needed to support industrial uses already exists.
- Areas are large enough to allow a full range of industrial activities to function successfully.
- Sufficient separation or special conditions exist to reduce the possibility of conflicts with development in adjacent less intensive areas.

LU 13.2 Preserve industrial land for industrial uses, especially where industrial land is near rail- or water-transportation facilities to allow marine- and rail-related industries that rely on that transportation infrastructure to continue to function in the city.

LU 13.3 Ensure predictability and permanence for industrial activities in industrial areas by limiting changes in industrial land use designation. There should be no reclassification of industrial land to a non-industrial land use category except as part of a City-initiated comprehensive study and review of industrial land use policies or as part of a major update to the Comprehensive Plan.

LU 13.4 Accommodate the expansion of current industrial businesses and promote opportunities for new industrial businesses and emerging industries within Seattle to strengthen the city's industrial economy.

LU 13.5 Restrict to appropriate locations within industrial areas those activities that—by the nature of materials involved or processes employed—are potentially dangerous or very noxious.

LU 13.6 Provide a range of industrial zones that address varying conditions and priorities in different industrial areas. Those priorities include maintaining industrial areas that have critical supporting infrastructure, leveraging investments in high-capacity transit service, providing transitions between industrial areas and less intensive areas, and promoting high-quality environments attractive to business expansion or to new industrial activities.

LU 13.7 Use the following industrial land use designations:

- Maritime, manufacturing, and logistics: This designation supports the city's maritime, manufacturing, logistics and other industrial clusters. Areas that have significant industrial activity, accessibility to major industrial infrastructure investments, or locational needs (Port facilities, shipyards, freight rail, and shoreline access) may be considered for the maritime, manufacturing, and logistics designation.
- Industry and innovation: This designation promotes emerging industries and leverage investments in high-capacity transit. These industrial transit-oriented districts may be characterized by emerging industries and high-density industrial employment that combine a greater mix of production, research and design, and office uses found in multi-story buildings. Areas in MICs that are generally within one quarter and one-half mile of high-capacity transit stations may be considered for the industry and innovation designation.
- Urban industrial: This designation encourages a vibrant mix of uses and relatively affordable, small-scale industrial, makers and arts spaces. Areas located at transitions from industrial to commercial and residential areas traditionally zoned for buffer purposes may be considered for the urban industrial designation.
- Industrial commercial: This designation is for industrial land located outside of Manufacturing and Industrial Centers and is intended to permit a range of activities such as light industrial uses, research and development uses, and offices.

LU 13.8 Prohibit new residential development in industrial zones except for certain types of dwellings, such as caretaker units and, in urban industrial zones, dwellings for workers, that are related to the industrial area and that would not restrict or disrupt industrial activity.

LU 13.9 Use the maritime, manufacturing, and logistics zones to promote a full range of industrial activities and related support uses.

LU 13.10 Apply the maritime, manufacturing and industrial zone mostly within the designated Manufacturing and Industrial Centers, where impacts from industrial activity are less likely to affect residential or commercial uses. Outside of Manufacturing and Industrial Centers, the maritime, manufacturing, and logistics zone may be appropriate along waterways used for maritime uses.

LU 13.11 Avoid placing industrial zones within regional, urban and neighborhood centers. However, in locations where a center borders a Manufacturing and Industrial Center, use the industrial commercial zone within the center where it abuts the Manufacturing and Industrial Center to provide an appropriate transition to help separate residential uses from heavier industrial activities.

LU 13.12 Consider using the urban industrial zone in locations where a center or village borders a Manufacturing and Industrial Center and where it may provide an appropriate transition to help separate residential uses from heavier industrial activities.

LU 13.13 Limit the density of development for nonindustrial uses in the Manufacturing and Industrial Centers to reduce competition from nonindustrial activities that are better suited to other locations in the city, particularly urban centers and urban villages, where this Plan encourages most new residential and commercial development. Permit a limited amount of stand-alone commercial uses in industrial areas as workforce amenities. Strictly limit the size of office and retail uses not associated with industrial uses in order to preserve these areas for industrial development.

LU 13.14 Recognize the unique working character of industrial areas by allowing flexibility in application of landscaping and street standards for industrial activities in the maritime, manufacturing, and logistics zone.

LU 13.15 Set parking and loading requirements in industrial zones to provide adequate parking and loading facilities to support business activity, promote air quality, encourage efficient use of the land in industrial areas, discourage underused parking facilities, and maintain adequate traffic safety and circulation. Allow some on-street loading and occasional spillover parking. Limit parking in the industry and innovation zone located in the vicinity of high-capacity transit stations.

LU 13.16 Maintain standards for the size and location of vehicle curb cuts and driveways in industrial zones in order to balance the need to provide adequate maneuvering and loading areas with availability of on-street parking and safe pedestrian, bike, and transit access.

LU 13.17 Permit noise levels in industrial areas, except buffer areas, that would not be allowed in other parts of the city, in recognition of the importance and special nature of industrial activities. When residential uses are permitted in industrial areas apply noise attenuation measures to the dwelling units to lessen impacts from noise on residents.

LU 13.18 Classify certain industrial activities as conditional uses in industrial zones in order to accommodate these uses while making sure they are compatible with the zone's primary industrial function and to protect public safety and welfare on nearby sites. Require mitigation of impacts on industrial activity and on the immediate surroundings, especially near less intensive zones.

LU 13.19 Prohibit uses that attract large numbers of people to the industrial area for nonindustrial purposes, in order to keep the focus on industrial activity and to minimize potential conflicts from the noise, nighttime activity, and truck movement that accompanies industrial activity. Consider allowing such uses in the urban industrial zone only.

LU 13.20 In the industry and innovation zone, consider development regulations that are compatible with employment-dense transit-oriented development. Establish minimum density standards to ensure employment density at a level necessary to leverage transit investments. Use upper-level density limits to discourage higher value ancillary uses that are more appropriate in non-industrial areas.

LU 13.21 In the industry and innovation zone, use development standards that promote development that meets the needs of industrial businesses including load-bearing floors, freight elevators, and adequate freight facilities.

LU 13.22 Use the urban industrial zone to provide an appropriate transition between industrial areas and adjacent residential or pedestrian-oriented commercial zones.

LU 13.23 In the urban industrial zone, allow a range of ancillary non-industrial uses. Recognize that industrial businesses in this zone have a greater need for a limited amount of space for such uses as tasting rooms and retail facilities that directly support the industrial activity of the business.

LU 13.24 Develop transitions between industrial areas and adjacent neighborhoods that support healthy communities, reduce adverse environmental impacts, and minimize land use conflicts.

LU 13.25 In the urban industrial zone, establish buffer standards to ease the transition from industrial areas to urban villages and other non-industrial parts of Seattle.

LU 13.26 Recognize the unique development opportunities that the Washington National Guard Armory in the BINMIC and the WOSCA site in the Duwamish MIC represent. Work with the State of Washington or other future owners of these sites to develop a comprehensive industrial redevelopment plan that maximizes public benefits and reflects its location within a Manufacturing and Industrial Center. This Plan should include features such as green infrastructure, district energy and waste management programs, and workforce equity commitments.

LU 13.27 Allow the widest possible range of manufacturing uses and related industrial and commercial activities within the industrial buffer zone, while ensuring compatibility with the activity and physical character of neighboring less intensive zones.

LU 13.28 Include development standards or performance standards for the industrial buffer zone that protect the livability of neighboring areas, promote visual quality, and maintain a compatible scale of development along zone edges. Apply these standards only in places where existing conditions do not adequately separate industrial activity from less intensive zones.

LU 13.29 Limit the height of structures on the borders of industrial buffer zones where streets along the zone edge do not provide sufficient separation for a reasonable transition in scale between industrial areas and less intensive neighboring zones, taking into consideration the permitted height in the abutting less intensive zone.

LU 13.30 Allow a wide mix of employment activities in the industrial commercial zones, such as light manufacturing and research and development.

LU 13.31 Support employment-dense emerging industries that require greater flexibility in the range of on-site uses and activities.

LU 13.32 Limit development density in industrial commercial and maritime, manufacturing, and logistics zones in order to reflect transportation and other infrastructure constraints, while taking into account other features of an area.

LU 13.33 Include development standards in the industrial commercial zone designed to create environments that are attractive to new technology businesses and that support a pedestrian-oriented environment, while controlling structure height and scale to limit impacts on nearby neighborhoods.

LU 13.34 Provide a range of maximum building height limits in the industrial commercial zones in order to protect the distinctive features that attract new technology businesses to the area—such as views of water, shoreline access, and the neighborhood scale—to make sure that these features will continue to be enjoyed, both within the zone and from the surrounding area.

LU 13.35 Assign height limits independently of the industrial zoning designation to provide flexibility in zoning-specific areas and to allow different areas within a zone to be assigned different height limits according to the rezone criteria.

LU 13.36 Restrict or prohibit uses that may negatively affect the availability of land for industrial activity, or that conflict with the function of industrial areas.

LU 13.37 Consider high value-added, living wage industrial activities to be a high priority.

LU 13.38 Permit commercial uses in industrial areas to the extent that they reinforce the industrial character, and limit specified non-industrial uses, including office and retail development, in order to preserve these areas for industrial development.

Location-Specific Regulations

DISCUSSION

In certain places, different sets of rules "overlay" and modify the underlying zoning regulations. These overlays recognize a special use or characteristic of the area. The policies in this section guide how the City adjusts its regulations to specific areas including:

- Major institutions, environmentally critical areas, and historic districts, which are also discussed in the Historic Preservation and Cultural Resources section within this element.
- Shoreline areas, which are also discussed in the Shoreline element of this Plan.
- Other overlays like the station area overlay, Pike/Pine overlay, stadium district transition overlay and master planned communities zone.

GOAL

LU G14 Location-specific regulations support the unique conditions that exist in certain areas of Seattle.

POLICIES

LU 14.1 Allow for zoning overlay districts, which modify the regulations of the underlying zoning, to address special circumstances and issues of significant public interest in subareas of the city.

LU 14.2 Establish a master planned community zone and apply the zone as a way to address unique opportunities for large site redevelopments in the densest areas of the city. Use this designation to provide predictability to the City, the community, and potential developers, with the intent to encourage a mix of uses at appropriate urban densities that use a cohesive urban design and promote high levels of environmental sustainability, housing affordability, and publicly accessible open space. Designate a master planned community only for large multiblock sites inside a regional center that are subject to unified control.

LU 14.3 Consider establishing a master planning process for large sites outside of Regional Centers in order to promote development that incorporates good urban design and appropriate public benefits.

LU 14.4 Regulate development and promote design guidelines in the stadium area transition overlay to promote an environment that is attractive and safe for the large volumes of pedestrians attending events in the area.

Major Institutions

DISCUSSION

Hospitals, colleges, and universities deliver vital services to residents of Seattle and the Pacific Northwest. They employ a significant number of Seattle workers and diversify the city's economy. However, they can also create localized traffic impacts and displace housing and businesses. The policies in this section help guide the City in supporting these institutions as they grow, while mitigating the impacts of that growth on the livability of surrounding neighborhoods.

GOAL

LU G15 Major Institution Overlays (MIOs) support the functions and benefits that major institutions provide the city and the region, including health care, educational services, and significant employment opportunities, while mitigating the adverse impacts associated with their development and geographic expansion.

POLICIES

LU 15.1 Support the coordinated growth of major institutions through the creation of MIO districts and the development of conceptual master plans to guide development in these areas. Use a master plan process to identify development standards for the overlay district that are specifically tailored to the major institution and the surrounding area.

LU 15.2 Allow MIOs to modify underlying zoning provisions and development standards, including use restrictions and parking requirements, in order to accommodate the changing needs of major institutions, provide development flexibility, and encourage a high-quality environment.

LU 15.3 Balance the need for major institutions to grow and change with the need to maintain the livability and vitality of neighboring areas.

LU 15.4 Prioritize growth within existing boundaries over the expansion of established boundaries.

LU 15.5 Encourage community involvement in the development, monitoring, implementation, and amendment of major institution master plans, including the establishment of advisory committees that include community and major institution representatives.

LU 15.6 Locate new major institutions in areas where their activities are compatible with the surrounding land uses and where the impacts associated with existing and future development can be appropriately mitigated.

LU 15.7 Define as major institution uses those that are part of, or substantively related to, the major institution's central mission or that primarily and directly serve institution users, and allow these uses within the MIO district, in accordance with the

development standards of the underlying zoning classifications or adopted master plan.

LU 15.8 Establish parking requirements in each MIO district to address the needs of the major institution, reduce parking demand in nearby areas, minimize unnecessary traffic in the surrounding areas, and limit the use of single-occupant vehicles.

LU 15.9 Use a transportation-management program to reduce the number of vehicle trips to the major institution and to limit the adverse impacts of traffic and of institution-related parking on surrounding streets, especially residential streets. Strive to reduce the number of single-occupant vehicles used for trips to and from major institutions especially at peak times. Allow short- or long-term parking space requirements to be modified as part of a transportation management program.

LU 15.10 Encourage housing production and preservation within MIO districts and limit impacts on housing in surrounding areas. Discourage conversion or demolition of housing within a major institution's campus, allowing it only when the institution needs to expand or when the institution replaces the lost housing with new housing. Prohibit the demolition of noninstitutional housing for replacement by principal-use parking that is not necessary to meet the parking requirement. Prohibit development by a major institution outside the MIO district boundaries when it would result in the demolition or conversion of residential buildings into nonresidential uses, unless authorized by an adopted master plan.

Historic Preservation and Cultural Resources

DISCUSSION

Historic preservation recognizes and protects aspects of our shared cultural heritage—buildings, districts, designed landscapes, and areas long used by Indigenous communities—that link to Seattle's past. From the Coast Salish peoples who have inhabited these lands and waters since time immemorial, to all newcomers from around the world who have come this place to live and work. Over time, Seattle has acquired historic features that have become part of the city's civic identity. Through the preservation of buildings, landscapes, archaeological sites, and objects of historic, cultural, political, economic, architectural, engineering, or geographical significance, and areas of Indigenous settlement, the city can continue to celebrate its heritage and maintain its unique sense of place.

Seattle values its past and recognizes and protects its heritage through understanding the relationships of people with the places they inhabit and the stories these places tell. One way we do this is by calling out more than 450 buildings, objects, and sites of exceptional significance, and eight historic districts. These visible connections to the past strengthen our sense of place and help build community. The benefits of historic preservation are not merely aesthetic. Preservation is integral to our economic development, and it also enhances our city's identity as a center for tourism, itself an important source of local jobs. Preserving historic buildings can help incubate small locally owned

businesses, revitalize commercial districts, and generate local jobs. Historic preservation promotes sustainability through the reuse, repair, and upgrading of existing built resources. The City can also help to recognize and celebrate areas of historic Indigenous settlements, protect the archeological resources that remain, and support ongoing use of these area by local Tribes.

This section discusses how the City should work to identify and regulate historic places and structures and cultural resources.

GOAL

LU G16 Historic and cultural resources are preserved, maintained, and celebrated to:

- Enhance the city's diverse cultural identity and heritage.
- Promote the economic opportunities and benefits of historic preservation.
- Promote the environmental benefits of preserving and adaptively reusing historic buildings and other features of our built and natural environment.

POLICIES

LU 16.1 Maintain a comprehensive survey and inventory of Seattle's historic and cultural resources. Prioritize and center BIPOC and under-represented communities in survey and inventory work in order to benefit and enrich all communities.

LU 16.2 Promote inclusive outcomes through representation of diverse narratives and equitable community engagement in historic preservation and a focus on the buildings and sites important to different cultural communities.

LU 16.3 Support the designation of areas as historic, cultural, and special review districts, and the designation of structures, sites, and objects as City of Seattle landmarks in order to protect, enhance, and perpetuate their historical, cultural, or architectural identities.

LU 16.4 Tailor development standards and design review processes specifically for a special review district to describe design-related features allowed, encouraged, limited, or excluded from the district. Allow adopted guidelines to modify, exempt, or supersede the underlying zone's standards.

LU 16.5 Encourage the adaptive reuse of designated landmark structures by allowing uses in these structures that may not otherwise be allowed under the applicable zoning.

LU 16.6 Use incentives, including the transfer of development rights, to encourage property owners and developers to restore or reuse designated landmark structures and specified structures in locally-designated historic and special review districts.

LU 16.7 Seek to protect the scale and character of the established development pattern in locally-designated historic and special review districts, while encouraging compatible and context-sensitive infill development.

LU 16.8 Expand outreach mechanisms to encourage inclusive outcomes through preservation in neighborhoods and communities that have not traditionally benefited from historic preservation efforts.

LU 16.9 Identify historic resources that can be successfully used to meet the city's housing goals.

LU 16.10 Support the preservation and perpetuation of living cultural traditions that form the relationships that people have with place.

LU 16.11 Work with local Tribes and indigenous communities to support Indigenous cultural sites, places, and areas of significance.

LU 16.12 Where possible, Identify, preserve, and protect archaeological and cultural resources including Indigenous sites and artifacts.

LU 16.13 Recognize the economic value of Seattle's historic resources in attracting tourism; encourage reinvestment of a share of the revenue derived from tourism to sustain and expand historic preservation.

LU 16.14 Encourage rehabilitation opportunities and reinvestment in vacant or underutilized historic properties to spark economic revitalization and add housing.

LU 16.15 Encourage rehabilitation of existing buildings to expand housing choices.

LU 16.16 Explore and provide various financial and regulatory incentives, if possible, to allow for the productive, reasonable, and adaptive reuse of historic resources.

LU 16.17 Encourage rehabilitation and adaptive reuse of buildings to conserve resources, increase energy efficiency, reduce embodied carbon emissions, reduce waste, and demonstrate stewardship of the built environment. Encourage deconstruction and salvage of building materials in lieu of mechanical demolition when adaptive reuse options for a building are determined infeasible to divert materials from the landfill, improve air quality, and support a circular economy.

LU 16.18 Promote seismic and energy efficiency retrofits of historic buildings to reduce carbon emissions, save money, and improve public safety.

Environmentally Critical Areas

DISCUSSION

Environmentally Critical Areas represent those areas of Seattle that require additional regulation due to their high environmental function or unique geologic conditions. Addressing the unique circumstances of these areas is important for environmental conservation and to prevent possible harm to people and structures from landslides, floods, and other events. These areas also play an important role in the cultural heritage of Seattle as areas of habitat and connection to the natural

world. For these reasons, the City has regulations that designate these areas and regulate development within them.

While this section discusses City regulations, the City also has an important role in restoring and stewarding natural areas to improve their value for wildlife and humans. Stewardship of our forests and waterways should be done in partnership with the Indigenous communities that have been stewarding these areas since time immemorial.

GOAL

LU G17 Environmentally critical areas regulations seek to:

- Protect the ecological functions and values of wetlands and fish and wildlife conservation areas.
- Prevent erosion on steep slopes.
- Protect public health, safety, and welfare in areas subject to landslides, liquefaction, floods, or peat settlement.
- Inform the public by identifying seismic and volcanic hazard areas.
- Minimize harm to people, property, public resources, or the environment.

POLICIES

LU 17.1 Use best available science when updating environmentally critical area policies and development standards.

LU 17.2 Regulate the design and siting of structures and land-disturbing actions associated with development projects in environmentally critical areas and buffers to protect the ecological functions and values of environmentally critical areas and their buffers and to protect public health and safety on development sites and neighboring properties.

LU 17.3 Limit disturbance of soil and vegetative cover within riparian corridors, wetland buffers, and steep slopes to:

- Control erosion.
- Conserve soil and ground conditions that support native vegetation.
- Prevent siltation and high-water temperatures in downstream habitats.
- Reduce runoff and dampen fluctuations in surface-water flows, which are typically problematic in urbanized areas.
- Maintain groundwater recharge flow to support stream flows during drier seasons.
- Protect contiguous vegetation to maintain wildlife habitat and corridors.
- Protect aquatic and wildlife habitats.
- Reduce the risk of other environmental impacts to streams, lakes, Puget Sound, and the City's stormwater facilities.

LU 17.4 Permit modification of development standards in environmentally critical areas and buffers to protect the ecological functions and values of the critical areas while allowing reasonable development.

LU 17.5 Seek to reduce the economic and administrative burden for projects that undertake voluntary enhancement and restoration.

LU 17.6 Provide opportunities for nonregulatory measures for protecting environmentally critical areas such as voluntary restoration efforts, environmental education, public recognition, grants for restoration of private property, and acquiring or retaining properties as natural areas.

LU 17.7 Work in partnership with Indigenous communities to update and implement environmentally critical areas regulations.

Geologic Hazards and Steep Slope Erosion Areas

LU 17.8 Regulate development on landslide-prone hillsides to protect against future damage due to instability that might be created or exacerbated by development, including potential damage to public facilities. Consider the relative risk to life or property when reviewing development proposals for landslide-prone areas.

LU 17.9 Require new development in liquefaction-prone areas to be designed and built to limit property damage and to reduce risks of injury and loss of life during earthquakes.

LU 17.10 Regulate development in peat settlement–prone areas to limit ground settlement caused by the removal of groundwater and by structural and earth-fill loads on those areas and nearby parcels.

Flood-prone Areas

LU 17.11 Regulate development in flood-prone areas in order to protect public health and safety, and aquatic habitat and to prevent damage to private property caused by hazardous flooding conditions.

Wetlands

LU 17.12 Seek a net gain in wetland function by enhancing and restoring wetland functions across the city in City projects.

LU 17.13 Protect Seattle's unique remaining wetland resources and use mitigation sequencing to address construction and postconstruction impacts in wetlands and their buffers.

LU 17.14 Seek to avoid a net loss in area of wetland acreage and require no net loss of wetland functions and values when development is allowed; functions and values include but are not limited to flood control, water quantity and quality, and fish and wildlife habitat.

Fish and Wildlife Habitat Conservation Areas

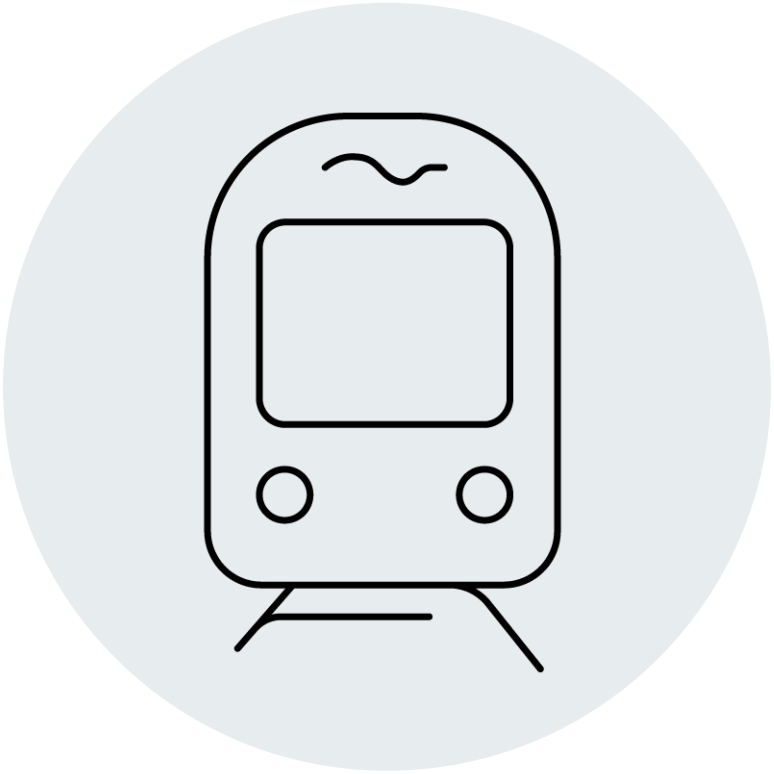
LU 17.15 Regulate development in and near designated fish- and wildlife-habitat conservation areas in order to protect native fish and wildlife, especially anadromous fish and other ESA listed species.

LU 17.16 Promote daylighting of streams that are in pipes, especially streams that support or will likely be able to support anadromous fish in the future.

LU 17.17 Limit development within the riparian corridor to protect the natural functions and values of these areas from the negative effects of urban development.

Abandoned Landfills

LU 17.18 Regulate development on abandoned solid-waste landfill sites and areas within a thousand feet of those sites to reduce the risks of ground subsidence, earthquake induced ground shaking, and methane-gas accumulation.



Transportation

Introduction

The Transportation element guides transportation investments to serve the city's current residents and businesses and to accommodate Seattle's future growth. Hundreds of thousands of residents and businesses in Seattle and throughout the region depend on the city's transportation system to access jobs, services, and community facilities, and to deliver freight and goods. Thousands more people will depend on it in the next 20 years as the city and region continue to grow.

In Seattle's future, a robust transportation system should:

- Help to build a more equitable city where all people have access to a safe and affordable transportation system that meets their daily needs for mobility.
- Contribute to a safer city by working to eliminate serious injuries and fatalities on city streets.
- Support safe and reliable freight and urban goods movement.
- Create an interconnected city where people have reliable, easy-to-use travel options.

- Support a more vibrant city with streets and sidewalks that generate economic and social activity, adding to the city's overall health, prosperity, and happiness.
- Contribute to a more affordable city with high-quality and affordable transportation options that allow people to spend their money on other things.
- Create a more sustainable and resilient city with greatly reduced greenhouse gas emissions from our transportation system.

Seattle's transportation system in 2044 will look very different than it does now. Light rail transit and frequent bus networks will be much more extensive, with light rail extending to West Seattle and Ballard and providing regional connections to Redmond, Tacoma, and Everett. New technological innovations in transportation such as smart parking and automated vehicles will change the way people move through Seattle. This Plan will guide the City's future actions to address these and other changes. The Plan will also shape a transportation future where all residents, especially in our most vulnerable and underinvested communities, benefit equitably.

Seattle already has a core network of streets serving a highly urbanized land use pattern. There is no room for major new streets, and it is neither feasible nor desirable to widen existing streets, which creates challenges but also opportunities as the City plans for growth. Therefore, we must use the streets and sidewalks we have in the most efficient way possible. This means prioritizing street space so that it can be used by the most people, at most times of the day, and in a variety of ways. While many people still rely on a personal car as their best or only transportation option, the City plans to make travel more efficient and predictable for all by offering high-quality travel alternatives. It also means reimagining how we use the right-of-way to include multiple public uses and amenities that make our neighborhoods and the city as a whole more livable.

The One Seattle Plan is coordinated with and provides policy guidance for implementation of the Seattle Transportation Plan, an integrated strategy to invest in multiple modes of travel to meet Seattle's future needs. The Seattle Transportation Plan provides more detailed direction for all of the transportation investments that Seattle will need over the next 20 years, including facilities that address non-automobile modes of travel—walking, biking, and transit—as well as freight movement and a continued important role for private automobile travel.

To support the goals and policies in this element, the Transportation Appendix contains inventories of transportation facilities and an analysis of the transportation needs over the next 20 years as we implement this Plan's growth strategy.

Supporting the Seattle Growth Strategy

DISCUSSION

The One Seattle Plan anticipates a future where Seattle continues to grow in the coming decades toward a population approaching one million residents. The level of growth, as well as how and where we grow, will have a big effect on future transportation needs. The development pattern described in the Growth Strategy and Land Use elements of this Plan will have a major influence on future transportation needs and shape how we plan for the City's transportation system.

In the City's new Growth Strategy, every area of Seattle has an important role in accommodating growth. This includes planning for compact walkable Regional, Urban, and Neighborhood Centers with a mix of uses. It includes more low-scale housing options in Urban Neighborhoods across the city. The strategy aims to make it easy to walk and bike to local shops and services. Planning for employment space will continue to focus on our Regional and Urban centers. Manufacturing and Industrial Centers will focus additional employment and economic activity near port, freight, and other key infrastructure.

Crucial to the success of the Growth Strategy is reliable transportation to, from, and within these places. This will require a transportation system that includes many methods of travel for all trips throughout the day, including during the evening and on weekends. Automobile and freight access to property will remain important for accommodating growth throughout the city. In addition, transportation facilities that connect to and support the city's industrial areas are important to the city's economy.

The Growth Strategy builds on the idea of complete communities where residents have access to their daily needs — shops, amenities, schools, parks, places of employment — via an easy and enjoyable walk, bike, roll, or transit trip. Many areas for future growth in the city already have a rich network of transportation options; others, including neighborhoods that are home to BIPOC and other communities that have experienced a history of under-investment, have gaps that must be filled over time. The One Seattle Plan aims to strike a balance between serving the areas that will see the most growth and equitably providing transportation services to all who need it.

GOAL

TG 1 Transportation decisions, strategies, and investments support the growth strategy for the City and the region and are coordinated with this Plan's land use goals.

POLICIES

T 1.1 Provide safe and reliable multimodal transportation facilities and services to promote and accommodate the growth that this Plan anticipates citywide, including centers of various types and sizes and urban neighborhoods across the city.

T 1.2 Design transportation infrastructure in Regional, Urban, and Neighborhood centers to support compact, accessible, and walkable neighborhoods for all ages and abilities.

T 1.3 Design transportation facilities to be compatible with planned land uses, with consideration of the planned scale and character of the surrounding neighborhood.

T 1.4 Plan for transportation improvements in Regional Centers that maintain and enhance a rich network of transit, pedestrian, and bicycle facilities and access to light rail and other regional connections.

T 1.5 Plan for transportation improvements within and between Urban Centers that provide access to high-capacity or frequent transit and maintain and expand pedestrian and bicycle facilities.

T 1.6 Plan for transportation investments within Neighborhood Centers and to surrounding Urban Neighborhood areas that prioritize walking and biking on safe, comfortable, and enjoyable routes to meet every day needs and that enhance connections to transit.

T 1.7 Provide a variety of affordable travel options, including pedestrian, transit, and bicycle facilities, to better meet the needs of historically underserved communities.

T 1.8 Identify the potential impacts of transportation investments on communities that are at risk of displacement and collaborate across City departments to mitigate those impacts through project design and construction and implementation of anti-displacement strategies that enable households, businesses, and cultural anchors to remain in place.

T 1.9 Develop multimodal level-of-service measures and standards to assess the performance of the transportation system and indicate potential need for transportation investments and demand management strategies as the city grows over time, consistent with the growth strategy.

T 1.10 Level of service shall be measured as follows:

	For City as whole	**For each Regional, Urban, and Neighborhood Center**
Vehicles	Single occupant vehicle trip share; and Vehicle miles traveled	SOV share (for each Regional Center and by subarea citywide)
Transit	Percentage of homes near a stop on a frequent transit route	Presence of frequent transit or light rail service
Bicycling	Percentage of homes near an all ages and abilities (AAA) bikeway	Access to an all ages and abilities (AAA) bikeway
Walking	Percentage of block faces that have a sidewalk	Percentage of block faces that have a sidewalk

T 1.11 Assess the multimodal LOS measures and standards over time and adjust as needed, based on review of other City transportation measures and goals.

Making the Best Use of the Streets We Have

DISCUSSION

To serve our needs today and in the future, the public street space in Seattle needs to accommodate different travel functions, community uses, and street trees. Because it will be difficult to expand our available public street space in any significant way, it is important for the City to use the existing streets in ways that meet our shared priorities and enhance quality of life for all residents. This section of the Plan establishes the policy framework for making those decisions.

To meet the different needs and functions of the right of way, streets are typically divided into three right-of-way zones. The **pedestrian realm** typically includes the sidewalk area, street trees, and landscape strip between the property line and the curb. The **travel way** portion of the road is typically dedicated for mobility. Finally, the **flex zone** typically found along the curb is the portion of the road with more flexible uses, such as addressing critical building access and loading needs, bus stops, and bicycle parking. In order to meet multiple needs, there are opportunities to reallocate space currently dedicated to vehicles, particularly vehicle storage, to be available as places for people, including open streets, shared streets, parklets, play streets, street trees, and other activating or greening uses of the street. Providing spaces for all these functions efficiently and where they are needed helps make the most of a limited resource.

Not every function can fit in every street. The goals and policies in this section provide direction on integrating and, where necessary, prioritizing functions within the different parts of a street. These policies also recognize that collectively two or more streets can combine to serve as a "complete corridor," since not every street can accommodate every need.

GOAL

TG 2 Seattle's streets accommodate and promote safe, comfortable, efficient movement of people and goods and include inviting spaces for community within the right-of-way.

POLICIES

T 2.1 Devote space in the right-of-way to accommodate multiple functions of mobility, access for commerce and people, activation, landscaping, and better management of vehicle parking.

T 2.2 Ensure that the street network accommodates multiple travel modes and users, including transit, freight movement, people walking, biking, or rolling, people with disabilities, general purpose traffic, and shared transportation options.

T 2.3 When prioritizing functions in the right-of-way, consider safety improvements, priority investment networks, and adjacent land uses.

T 2.4 Prioritize mobility needs in the street travel way first based on safety concerns and then on the recommended networks and facilities identified in the Seattle Transportation Plan.

T 2.5 Include at least one general-purpose through travel lane per direction of travel on most arterials, where vehicular mobility will be maintained, as part of the project development process.

T2.6 Modernize our streets toward achievement of our vehicle-mile traveled and mode-split goals, including through project analysis and evaluation processes that result in traffic volumes consistent with these goals.

T 2.7 Align transportation investment priorities with the values, goals, and targets in the Seattle Transportation Plan related to safety, equity, environmental sustainability, mobility and economic vitality, livability, and maintenance and modernization.

T 2.8 To resolve potential conflicts in the right-of- way, employ the following tactics:

- Implement transportation and parking-demand management strategies to encourage more efficient use of the existing right-of-way.
- Allocate needed functions across a corridor composed of several streets or alleys if all functions cannot fit in a single street.
- Share space between travel modes and uses where safe and where possible over the course of the day.
- Encourage off-street accommodation for non-mobility uses, including parking, electric vehicle charging, and transit layover.
- Meet critical access needs of establishments to ensure parcels, goods, services, passenger, and solid waste services can be done safely and efficiently.
- Consider the unique needs of local communities within the decision-making process.

T 2.9 Build new and upgrade existing sidewalks, where needed, including in areas planned for new growth and development, and consistent with the dimensional standards as specified in Streets Illustrated.

T 2.10 For streets where priorities for modes of travel overlap and where rights-of-way are constrained, generally apply the following principles to guide corridor investments and management:

- Within regional, urban, and neighborhood centers and near light rail stations, prioritize the needs of people walking, rolling, and biking.
- Within manufacturing and industrial centers (MICs), prioritize truck movement, especially at freight bottlenecks, with strategies that may include operational strategies, freight-and-bus (FAB) lanes, and truck-only lanes.
- Outside of regional, urban, and neighborhood centers and MICs, prioritize transit travel time and reliability.

- On streets prioritized for transit and trucks, prioritize freight and transit travel time and reliability, with strategies that may include FAB lanes, transit-only lanes, and other right-of-way and operational strategies.
- On streets that accommodate both freight and bicycle travel, facilities for trucks and bicycles should be clearly separated and fully comply with width and materials standards, consistent with Streets Illustrated.

T 2.11 Preserve and enhance the boulevard network to create a usable open space system that accommodates healthy and active transportation while meeting local access needs.

T 2.12 Maintain, preserve, and enhance the City's alleys as a valuable network for access, loading and unloading for freight, and utility operations, and where appropriate opportunities for public space.

T 2.13 Manage travel within limited street space, including reallocation of street space as needed, to enhance comfort, convenience, and directness for walking, biking, rolling, and transit.

T 2.14 Implement curb space management strategies, such as on-street parking pricing and time limits, load zones and other critical access needs for buildings, and residential parking management to promote transportation choices, enhance the efficient delivery of goods and services, improve customer access, and enable public space activations in curb lanes.

T 2.15 Address critical access needs for buildings when affected by transportation projects and private redevelopment by re-allocating load zones, encouraging shared parking amongst area businesses, and considering an area-wide curb management plan.

T 2.16 If a building does not have off-street loading access, whether on-property or via an alley, it should have its critical access needs provided for at the curb, achieved by maintaining curb space for commerce, solid waste pick-up, building maintenance, and accessible pick up/drop off.

T 2.17 Design and manage the transportation system, including the curb space, so that people with limited mobility have safe and convenient access to their destinations.

T 2.18 In collaboration with the community, create and design vibrant public spaces within and near rights-of-way that:

- Foster social interaction and enhance the public realm
- Prioritize community functions, public life, and greening
- Promote access to sustainable transportation options
- Deemphasize vehicular use in strategic locations
- Reallocate street space from vehicle storage to people-oriented uses

T 2.19 Prioritize freight on streets classified as Major Truck Streets; Complete Street improvements that support other modes may also be considered on these streets.

T 2.20 Limit impacts to emergency response vehicles along high-volume response routes as other modal priorities are implemented.

Expanding Transportation Options

DISCUSSION

This Plan emphasizes strategies to increase travel options, moving away from reliance on single-occupant vehicle travel, and toward more options to get around the city.

Transit, bicycling, and walking reduce collisions, stress, noise, and air pollution, while increasing social contact, economic vitality, affordability, and overall health. They also make more efficient use of our rights-of-way by increasing person throughput vital to meeting the mobility needs of a growing city. Finally, with a large portion of our vehicle fleet still reliant on internal combustion engines, reducing car travel will help the city reduce greenhouse gas emissions sooner. The best way to get Seattleites to take advantage of these options is to make them easy and enjoyable choices for people of all ages and abilities and accessible to people at all income levels.

Strategies for increasing travel options include providing more housing options in centers that are well served by transit, along with completing the City's transit, bicycle, and pedestrian networks. The City has incorporated its plans for individual travel modes into the Seattle Transportation Plan.

The Seattle Transportation Plan includes a series of Priority Investment Networks, which describe and prioritize investments in infrastructure that supports different modes of travel, along with accompanying maps. These include maps for transit service, transit capital investments, bikeways, pedestrian facilities, and truck routes. These maps are included in the Transportation appendix.

While not everyone can always walk, bike, use a car-share service, or ride transit, the City can reduce the number of drive-alone trips that residents, employees, and visitors take, and even reduce the need to own a personal vehicle. Improving transportation choices can protect the environment, enhance the local economy, and support healthy communities. If more people use different types of transportation during the busiest times of day, more people and goods can get to their destinations in a reasonable time. Reducing drive-alone trips during congested periods is consistent with the City's overall commute-trip reduction goals and overall expansion to manage travel demand for all trips.

To help residents make informed decisions, the City must consider all aspects of the transportation system. One effective approach is through transportation demand management, which aims to reduce travel impacts on the system, especially drive-alone trips during peak times of the day. This includes evaluating parking availability, cost, and proximity to destinations which influence the choice to drive or use other travel options. Efficient first-mile and last-mile travel is crucial for transit

users. The first and last mile can often be traveled by walking, biking, ride sharing, or local bus service. To ensure we are doing this equitably, we need to improve accessibility to frequent and reliable transit in neighborhoods with proportionally more people who have lower incomes or depend heavily on transit.

Plans that the City has developed for individual travel modes are addressed in an integrated approach described in the Seattle Transportation Plan (2024). For more information on the specific investments that the City anticipates and plans to make to support transit and bicycle use, refer to the maps in Appendix 1. For more information about the investments the City plans to make in infrastructure that supports walking, see the Seattle Transportation Plan.

GOAL

TG 3 People's mobility needs are met by providing equitable access to and encouraging the use of multiple transportation options.

POLICIES

T 3.1 Expand transportation options to and within Regional, Urban, and Neighborhood centers, where most of Seattle's population and job growth will occur.

T 3.2 Invest equitably in initiatives, projects, and programs that aggressively encourage mode shift towards low-emissions transportation options for all trips.

T 3.3 Develop and maintain a high-quality network of connected bicycle, pedestrian, and transit facilities.

T 3.4 Strengthen the coordination among land use, housing, transportation, and economic strategies to reduce overall household travel costs.

T 3.5 Plan for and develop transportation systems and facilities so that all residents, regardless of income, age, ability, and vehicle-ownership, have access to a wide range of affordable travel options.

T 3.6 Improve transit access to underserved neighborhoods and populations through expansion of existing transit services, programs that reduce transit fares, and partnerships with agencies and other providers.

T 3.7 Develop a citywide transit system that includes a variety of transit modes to meet passenger capacity needs with frequent, reliable, accessible, and safe service to a wide variety of destinations throughout the day and week, including commute and non-commute trips.

T 3.8 Improve access to transit by supporting first-/last-mile connections, including on-demand shared rides to trunk line stations and improved safety and walking infrastructure connecting to transit stops and stations.

T 3.9 Improve east-west mobility between neighborhoods and destinations, especially as additional light rail service begins, and bus service is redeployed.

T 3.10 Make transit services affordable to low-income residents through programs that reduce household transportation costs.

T 3.11 Optimize bus, train, and streetcar operations by adjusting signals and providing transit-only, freight and bus-only, or transit-priority lanes to promote competitive travel times for transit relative to automobile travel.

T 3.12 Partner with Sound Transit, King County Metro, and other transit providers to continuously improve the overall transit experience, including improvements to system capacity, accessibility, and system facilities and amenities.

T 3.13 Create welcoming community and mobility hubs that combine transportation options, traveler amenities, community spaces, and travel information into a seamless experience.

T 3.14 Partner with private mobility providers, such as car share, bike share, taxis, and on-demand micro-transit, to expand access to their services throughout the city and reduce pricing terms for lower-income individuals.

T 3.15 Develop and maintain bicycle and pedestrian facilities, including public stairways, that enhance the predictability and safety of all users of the street and that connect to a wide range of key destinations throughout the city.

T 3.16 Look for opportunities to reestablish or improve connections across highways and railroads by enhancing existing crossings and creating new ones and by constructing lids, especially where these can also enhance opportunities for development, open space, income-restricted homes, and neighborhood cohesion.

T 3.17 Accelerate and scale sidewalk construction and refurbishment by ensuring coordinated development of sidewalks and pedestrian safety infrastructure in line with anticipated higher-density development envisioned in the Growth Strategy.

T 3.18 Design new and improve existing pedestrian crossings on arterials to meet or exceed Americans with Disabilities standards.

T 3.19 Develop facilities and programs to support bike sharing, e-scooter sharing, and other similar micromobility options that encourage short trips to be made by walking, biking, or other zero-emission mobility devices.

T 3.20 Implement improvements, such as curb ramps, accessible pedestrian signals, accessible parking, and accessible transit stops, to make traveling in Seattle more accessible for people of all abilities.

T 3.21 When determining if and where a new or emerging form of mobility belongs within the right-of-way, consider vehicle size, speed, and other safety-related factors.

T 3.22 Support and plan for innovation in privately provided transportation options such as shared mobility, including car sharing, bike sharing, micromobility, taxis, and

transportation network companies, which can increase travel options and enhance mobility.

T 3.23 Anticipate, manage, and leverage innovative transportation technologies to meet community values and minimize their potential negative impacts related to safety, equity, affordability, and environmental sustainability.

T 3.24 Adapt streets for new and evolving forms of mobility devices, such as commercial or private cargo bikes, e-scooters, personal delivery devices, and low-speed electric vehicles (LSEVs), to create more travel options beyond traditionally sized vehicles.

T 3.25 Develop and implement strategies to manage the evolution toward connected and autonomous vehicles, recognizing that government and industry must partner to deliver their anticipated benefits safely, including the discouragement and limiting of zero-occupancy automated passenger vehicles.

Creating an Equitable Transportation System

DISCUSSION

The Seattle Department of Transportation's work—delivering an equitable transportation system—is guided by a Transportation Equity Framework (TEF), which was developed in partnership with community. It aims to amplify community voices through inclusive decision-making, co-creation, and prioritizing investments in underserved areas to improve safety, accessibility, and affordability, while also considering the needs of people with mobility challenges.

Our transportation system today does not serve everyone equally. Black, Indigenous, and People of Color (BIPOC) communities, people with disabilities, and people with lower incomes face higher costs—whether monetary, time-related, or impacting their health and welfare. These challenges are worsened by displacement due to high living costs and limited access to affordable housing and high-quality transit. Climate change disproportionately affects communities least responsible for it, often those historically underserved. Through climate justice, we can focus investments on those most impacted by climate change, while assigning responsibilities to groups better able to address it.

GOAL

TG 4 Transportation-related inequities are eliminated through community-driven solutions and restorative practices.

POLICIES

T 4.1 Include the perspectives, priorities, and needs of communities of color and underrepresented groups in transportation planning and decision-making.

T 4.2 Address inequities in the transportation system by prioritizing investments in historically underserved communities, improving accessibility for people with

mobility challenges, and supporting local residents and businesses, especially those at high risk of displacement.

T 4.3 Remove cost as a barrier so everyone can take the trips they need to make.

T 4.4 Provide equitable transportation access through direct subsidies and tailored mobility services for disadvantaged populations, including for people with mobility impairment or low income.

T 4.5 Support shifts towards non-punitive transportation enforcement approaches that reduce harm and enhance public safety on city streets.

Building a Green Transportation System

DISCUSSION

Encouraging the use of non-automobile travel options supports not only the City's growth strategy but also its environmental goals, including those related to climate change. Cars, buses, trucks, and other motorized transportation make up Seattle's largest source of greenhouse gas emissions, and the City's Climate Action Plan sets high standards for reducing greenhouse gas emissions. Using more fuel-efficient transportation options to move larger numbers of people on well-designed and well-maintained streets is a crucial step to creating a healthy urban environment, especially in neighborhoods and communities, including communities of color, that have been disproportionally impacted by pollution. By reducing the need for personal car use, the City can also reduce congestion and provide more opportunities to reallocate public right-of-way for street trees and landscaping. Providing and promoting a wider variety of transportation options is also integral to achieving these environmental goals.

GOAL

TG 5 Seattle's transportation system promotes healthy communities, protects and improves our environmental quality, and contributes to a future free of climate pollution.

POLICIES

T 5.1 Accelerate and scale strategies to reduce transportation related greenhouse gas emissions consistent with the long-term goal of net-zero citywide emissions by 2050.

T 5.2 Accelerate and scale reduction in vehicle miles traveled (VMT) to achieve 37% reduction by 2044.

T 5.3 Implement projects, policies, programs, and street designs, including right-sizing the amount of space dedicated to general-purpose travel and long-term vehicle storage, to reduce drive-alone vehicle trips and vehicle-miles traveled.

T 5.4 Pursue a mix of capital and programmatic investment along with management strategies to establish low-carbon/low-pollution neighborhoods (LPNs), designated

areas or streets where the City can deploy a variety of pilot, policy, program, and physical improvements to improve air and water quality, mobility, and community health.

T 5.5 Manage the transportation system, including movement of both people and goods, to support a shift to electrification, clean fuels, and smaller vehicles, such as cargo bikes, e-scooters, and other emerging mobility options, and phase out over time the use of fossil fuel-powered vehicles.

T 5.6 Encourage the use of electric freight, transit, motor vehicles, and e-cargo bicycles and the expansion of electric vehicle charging stations for personal vehicles, private fleets, and transit.

T 5.7 Accommodate publicly accessible electric vehicle charging infrastructure in the right-of-way when nearby off-street options are limited to promote equitable access and just transition to electric vehicles. Consideration should be given to right of way locations that do not preclude construction of priority transportation network investments nor use of the curb to provide for critical building access needs such as loading or solid waste cart staging.

T 5.8 Improve freight mobility and access to pick up and delivery points to reduce truck idling, improve air quality, and minimize the impacts of truck parking and movement in residential areas.

T 5.9 Design and manage streets to promote green infrastructure, new technologies, and active transportation modes while addressing safety, accessibility, and aesthetics.

T 5.10 Enhance and expand tree canopy and landscaping in the street right-of-way.

T 5.11 Retrofit transportation facilities to improve fish passage.

T 5.12 Design and implement new and retrofitted transportation facilities with water quality and quantity stormwater system improvements to reduce roadway runoff pollution into natural drainage systems and the waters of the Puget Sound.

Supporting a Vibrant Economy

DISCUSSION

The movement of goods and services is critical to economic development in Seattle and the region. Seattle's businesses and residents rely on truck routes for safe and timely transportation of goods. Freight carriers depend on a well-functioning network of rail, water, air, and truck transportation. The Seattle Transportation Plan identifies the city's overall freight network and prioritizes investments for freight mobility projects. This includes addressing the exponential growth in delivery trips to dispersed locations across the city and preparing for the changing needs of goods movement and delivery due to evolving consumer demand and overall population growth.

In addition to goods movement, a well-designed transportation network supports a thriving economy by enhancing access to jobs, businesses, schools, and recreation. This kind of easy access contributes to the success of our neighborhood business districts and small businesses and makes it easier for people to access their daily needs for goods and services. Enhancing freight mobility and access also enhances Seattle's role as the hub for regional goods movement and as a gateway to national and international suppliers and markets.

GOAL

TG 6 The transportation system improves mobility and access for goods and services to support and promote economic opportunity throughout the city.

POLICIES

T 6.1 Sustain and enhance the freight network that connects Manufacturing and Industrial Centers (MICs) to the city and region, enhances freight mobility and operational efficiencies, and promotes the city's economic health.

T 6.2 Enhance goods and services movement to, within, and between Seattle's MICs and Regional, Urban, and Neighborhoods centers.

T 6.3 Design, maintain, and operate freight corridors to provide for efficient movement of truck traffic to and from regional connectors.

T 6.4 Expand neighborhood delivery hubs, central drop-off / pick-up locations for goods, to more locations to improve overall urban goods delivery throughout the city.

T 6.5 Use intelligent transportation system technology to alert motorists, bicyclists, and pedestrians to the presence and anticipated length of closures due to train crossings and bridge openings for water vessels.

T 6.6 Improve safety and operational conditions at at-grade rail crossings of city streets, including consideration of grade separation.

T 6.7 Work with freight stakeholders and the Port of Seattle to maintain and improve intermodal freight connections involving Port container terminals, rail yards, industrial areas, airports, and regional highways.

T 6.8 Where appropriate, support efficient and safe movement of goods by rail and promote efficient operation of freight rail lines and intermodal yards.

T 6.9 Increase efficient and affordable transportation access to jobs, education, and workforce training.

T 6.10 Promote freight demand management technologies and strategies that can consolidate urban goods delivery trips and encourage vehicles that are sized appropriately for an urban environment.

T 6.11 Encourage and create great streetscapes and activate public spaces in the right-of-way to promote economic activity.

Promoting Safe Travel for All

DISCUSSION

Safety guides every decision that the City makes for transportation system operation and design. People expect to feel safe as they use streets, transit facilities, sidewalks, and trails. Collisions involving pedestrians or people riding bicycles represent a high percentage of the serious injuries and fatalities in the city. When we invest in protecting our most vulnerable road users, such as pedestrians and bicyclists, we help build strong communities where residents and visitors are more likely to walk or bike, especially for short trips. Safer streets are also more efficient streets; they have fewer and less severe collisions, allowing people and goods to move safely and efficiently. In addition to making safety improvements, the City works to build a culture of mutual awareness between travelers. The City respects the right of all to travel safely and also feel safe regardless of how they choose to get around.

The policies in this section reflect and build on the culture of Vision Zero, an approach to designing and managing our streets to eliminate traffic deaths and serious injuries. Vision Zero focuses on the most effective ways to reduce harm while creating a culture of care and dignity for all travelers. To achieve Vision Zero, we need to evolve our streets for slower speeds; limit conflict points between travelers; and focus on the safety and sense of safety of people walking, biking, and rolling. The Seattle Transportation Plan provides guidance to accelerate progress toward Vision Zero through a "Safe System" framework.

GOAL

TG 7 Seattle's transportation system is safe for everyone, particularly the most vulnerable travelers.

POLICIES

T 7.1 Work toward Seattle's Vision Zero goal to end traffic deaths and serious injuries on city streets by 2030 by focusing on the most effective and equitable ways to reduce harm.

T 7.2 Adopt speed limits that enhance safety and use strategies, including enforcement and other measures, to reduce vehicle speeding.

T 7.3 Develop and implement programs to educate all users of the street on rules of the road, rights, and responsibilities.

T 7.4 Enhance safety at locations with heightened risks of conflict in the right-of-way, including at-grade railroad crossings and free-flowing ramps on and off city streets.

T 7.5 Improve safety for all modes of transportation on streets heavily used by trucks.

T 7.6 Guided by the federally recognized Safe System approach and Seattle's Transportation Equity Framework, make transportation safety and mobility investments in the most effective and equitable way, emphasizing design over punitive practices and individual level behavior change.

T 7.7 Make safety a top priority, especially for people traveling outside the protection of a vehicle, and incorporate Vision Zero and Safe System approaches into every project and program.

T 7.8 Use complete street principles, traffic-calming, and neighborhood traffic control strategies to promote safe neighborhood streets and discourage cut-through traffic.

T 7.9 Improve pedestrian lighting, especially along transit routes and where connections between different travel options are made.

T 7.10 Support public safety through maintenance of critical access routes, including but not limited to emergency vehicle routes and priority snow-clearance routes.

Connecting to the Region

DISCUSSION

Seattle is the largest employment and cultural center in the central Puget Sound region. As such, the city is a destination for people from all over the metropolitan area for work, shopping, entertainment, events, and recreation. The city is served by a number of state and regional transportation facilities, including two interstate highways; several state highways; a regional light rail, commuter rail, and bus system; a ferry network; waterways; and railroads. While the bulk of the Transportation element addresses transportation within the city limits, this section provides guidance for larger regional projects and facilities that serve Seattle. It also provides guidance for Seattle's participation in regional transportation planning and funding efforts.

GOAL

TG 8 Regional projects and programs affecting Seattle are consistent with City plans, policies, and priorities and help to connect the city with the surrounding region.

POLICIES

T 8.1 Coordinate with regional, state, and federal agencies, other local governments, and transit providers when planning and operating transportation facilities and services, especially those that reach beyond the city's borders.

T 8.2 Support completion of the freeway high-occupancy-vehicle lane system throughout the central Puget Sound region and continued use of that system for promoting more efficient travel.

T 8.3 Limit freeway capacity expansions intended primarily to accommodate drive-alone users to allow only spot improvements that enhance safety or remove operational constraints in specific locations.

T 8.4 Support a strong regional ferry system that maximizes the movement of people, freight, and goods.

T 8.5 Support improvements to ferry terminals that encourage walk, bicycle, rolling, and transit access to and from the terminals, improvements that enhance transfer and waiting environments, and, along with management strategies, improvements that minimize vehicle queueing on city streets.

T 8.6 Plan for the City's freight network to connect to the state and regional freight network and to continue providing good connections to regional industrial and warehouse uses.

T 8.7 Work with transit agency partners to expand and optimize cross-jurisdictional regional light rail and bus transit service investments that function as a single, coordinated system to encourage more trips to, from, and within Seattle on transit.

T 8.8 Work with regional transit agencies to plan for and provide service that is consistent with this Plan's growth strategy.

T 8.9 Support federal, state, and regional agencies to build out and expand intercity rail service including commuter rail, Amtrak, and high-speed rail.

T 8.10 Work with private shuttle, intercity bus, and charter service operators to support their operations and manage their routes, stop locations, and curbside access.

T 8.11 Support the state and region in advancing transportation mobility management strategies.

T 8.12 Work with neighboring jurisdictions and King County to integrate the City's bicycle network with regional bicycle facilities, the regional multi-use trail network, and the Great American Rail-Trail.

T 8.13 Collaborate with local, county, and regional agencies to promote transportation demand management, including to reduce cross-jurisdiction drive-alone trips.

T 8.14 Collaborate with county, regional, and state transportation partners, as well as employers, to adopt strategies to meet the transportation needs of people displaced from Seattle to continue to access community and cultural amenities and employment within the city.

Operating and Maintaining the Transportation System

DISCUSSION

Thoughtful operation and maintenance of the transportation system promotes safety, efficiency, infrastructure preservation, and a high-quality environment. Caring for the condition of the transportation system brings many co-benefits. Street pavement that serves cars and trucks is the same surface that supports smooth transit operations, reliable deliveries, safe biking, and even surfaces for stable street crossings by walking or rolling. Well-maintained streets, sidewalks, bridges, and other infrastructure make conditions safer for all travelers, especially those with limited mobility due to age and/or disability.

Spending money on maintaining and preserving the system today can prevent spending more dollars on replacing parts of the system later. This is particularly true for the more expensive and vital transportation assets, such as pavement, sidewalks, parking pay stations, intelligent transportation system devices, traffic-signal infrastructure, and bridges. When we prevent infrastructure from falling into disrepair, we can even influence travel choices and encourage people to spend time in public spaces, meet neighbors, and shop at local businesses.

Since the City makes and maintains its transportation improvements with taxpayer money, it must spend every dollar wisely and in a way that is consistent with the City's overall vision. The City keeps a comprehensive inventory of transportation assets that includes information about the condition of its most valuable assets. The City uses performance measures to decide whether and when to repair or replace infrastructure. In addition to planning for future maintenance, the City must address the significant backlog of unmet maintenance needs that currently exists. Investments in operations and maintenance are also key opportunities to modernize our transportation system and to address the needs of BIPOC and other communities that have experienced historical underinvestment.

As we take care of the transportation system we have today, we must also look to the future. The technologies and systems we use to safely and efficiently operate our streets—such as signals, cameras, and sensors—are constantly evolving. Updating them can help us operate the system more effectively, and sensors can help us monitor the structural health of infrastructure in real-time to aid in asset management.

To ensure our streets work today and in the future, we need to maintain our streets, sidewalks, and bridges. And incorporate planned safety and priority network improvements with maintenance work. In doing so, we can reduce the disparities in the quality of infrastructure among neighborhoods. At the same time, we can prepare our streets and be ready to adapt for new travel options and emerging technologies.

GOAL

TG 9 Transportation assets are maintained and modernized, ensuring the long-term viability of investments, reduced costs, and safe conditions.

POLICIES

T 9.1 Operate the transportation system to prioritize safety while also promoting efficient mobility consistent with identified priority modes, priority investment networks, and land use context.

T 9.2 Develop multiple modal levels-of-service measures aligned with our priority modes to guide project development decision making and encourage more efficient use of the existing right-of-way.

T 9.3 Employ state-of-the-art intelligent transportation systems to increase efficiency of movement and reduce travel delays.

T 9.4 Use asset maintenance and replacement opportunities to not only improve the condition of transportation infrastructure and equipment, but to also enhance safety, reduce dependence on driving, promote sustainable travel options, and support economic vitality.

T 9.5 Explore innovative means of reducing maintenance costs such as converting right-of-way into other uses when appropriate.

T 9.6 Mitigate construction impacts from City and private projects on the use of the street right-of-way and on the operation of the transportation system, especially for vulnerable populations.

T 9.7 Work to eliminate disparities in the condition of transportation infrastructure in historically underserved neighborhoods.

T 9.8 Create training, youth employment, and living wage opportunities in the construction and major maintenance of transportation facilities for members of BIPOC and other communities with a history of underinvestment.

Funding

DISCUSSION

The City's transportation network is vital to preserving the quality of life, prosperity, and health of all Seattleites. Only with adequate funding can Seattle continue to operate, maintain, and improve its transportation network to meet current and future needs. Transportation funding comes from a variety of dedicated and flexible sources. The City currently uses various known sources and may explore additional or new options to supplement available funding. Significant current city funding sources for transportation include:

- Property tax levies
- Sales tax revenues
- Commercial parking tax revenues

- Automated traffic enforcement camera revenues
- Transportation network company tax revenues
- Federal and State grants
- Partnerships with key stakeholders like Sound Transit, King County, and the Port of Seattle
- City General Fund
- Real estate excise taxes
- Motor vehicle excise taxes
- Vehicle license fees
- Street use and occupation, permit review, and other developer fees

The 2024 Transportation Levy provides $1.55 B over 8 years (through 2033). The levy funds will be used to enhance the city's transportation infrastructure including building sidewalks and crosswalks, paving streets, repairing bridges, planting trees, making connections to light rail stations and transit, and creating more walking, rolling, and biking routes to places where people live, work, and play. Over the next 20 years, the City may also consider pursuing additional funding options in partnership with the State, such as tolls and road user charges based on vehicle miles traveled. These new sources, however, will require time to develop and implement.

Delivering priority transportation projects and programs in Seattle depends on various funding sources, each with different usage restrictions. These restrictions often reflect legislative or voter intent, such as the voter-approved 0.15 percent sales tax for transit support. Some funds are flexible, while others are highly restricted or tied to specific projects or locations. The transportation department carefully manages this diverse funding landscape to align investments with community values. The department will continue to navigate funding opportunities, constraints, and partnerships to successfully implement strategies to achieve our transportation goals.

Given funding restrictions and availability, the City is developing an adaptable, multi-faceted transportation funding plan. The availability of funding will determine the pace of delivering the STP's vision through projects and programs over its 20-year lifespan. Additional information on transportation financing is included in the Transportation appendix, including estimated revenues and projected expenditures.

GOAL

TG 10 Transportation funding is sufficient to operate, maintain, and modernize the transportation system that supports the City's transportation, land use, economic, environmental, equity, and other goals.

POLICIES

T 10.1 Develop a holistic multi-resource long-range funding plan to guide decisions about levies, ballot measures, the commercial parking tax, and other funding sources.

T 10.2 Work with regional and state partners to encourage a shift to greater reliance on user-based taxes and fees, and on revenues related to impacts on the transportation system and the environment.

T 10.3 In partnership with WSDOT and PSRC, build on a long history of stakeholder and community discussions to deliver equitable mobility management strategies that provide multiple benefits including:

- managing travel demand;
- reducing vehicle miles traveled and greenhouse gas emissions;
- generating revenue to supplement or replace declining gas tax revenue; and
- using revenue to pay for equitable transportation investments and outcomes.

T 10.4 Leverage local funding resources by securing grants from regional, state, and federal sources, and through contributions from those who benefit from improvements.

T 10.5 Partner with other City departments, as well as regional transportation and public works agencies, to coordinate investments, maximize project integration, reduce improvement costs, and limit neighborhood and environmental justice impacts from construction of transportation facilities.

T 10.6 Make strategic investment decisions consistent with the Seattle Transportation Plan and the city's growth strategy.

T 10.7 Prioritize investments by considering how they advance the Seattle Transportation Plan goals for Safety, Equity, Sustainability, Mobility & Economic Vitality, Livability, and Maintenance & Modernization.

T 10.8 Consider use of transportation impact fees to help fund transportation system improvements needed to serve growth.

T 10.9 Plan to meet future transportation needs by preparing a six-year Capital Improvement Plan (CIP) that identifies anticipated projects, programs, and funding strategies, along with longer term transportation facilities plans and analyses that identify anticipate additional future transportation needs, costs, and potential revenue sources.

T 10.10 Identify and evaluate possible additional funding resources and/or alternative land use and transportation scenarios if the level of transportation funding anticipated falls short of the estimated amount.

Housing

Introduction

A Vision of Housing Abundance

The One Seattle Plan envisions a future where everyone in Seattle has a home that meets their needs. When housing is safe, affordable, and abundant, we can fulfill many of our goals for the future. Households achieve the stability necessary to build roots in their community. Families have plentiful options to grow, shrink, and meet their changing needs. People have the mobility to access jobs and educational opportunities, local businesses have a customer base that sustains them, and employers can attract and retain workers. Achieving housing abundance is fundamental to addressing our homelessness crisis, redressing historical patterns of segregation and exclusion, and creating opportunities for displaced residents to return to their communities.

Achieving this vision will require us to address the root causes of Seattle's longstanding housing crisis. Despite substantial construction in recent years, housing supply has not kept up with population and employment growth, causing an overall shortage of homes that drives up rents and

sales prices. Most new housing production has been small rental apartment units in areas long designated as Urban Centers and Villages in Seattle's Comprehensive Plan. Despite growing our investments in affordable housing, we are far from meeting the housing needs of low-income people who currently live, work, or wish to live in Seattle but cannot afford market prices. As prices rise, households must devote more and more of their income toward housing costs, leaving less for other basic needs, and straining their ability to save towards homeownership.

This crisis forces many to leave their communities, with ripple effects throughout our city and region. Families who relocate to find a suitable and affordable home must endure longer commutes from suburban locations with consequent environmental and health impacts. Low-income households are displaced, with the greatest impacts on people of color, immigrants, and refugees who have less income and wealth, and who have withstood generations of institutionalized racism and face ongoing discrimination in housing. Ultimately this causes more people to lose their housing entirely, as a $100 increase in median rent is associated with a nine percent increase in homelessness.[1]

A Legacy of Racial Exclusion and Inequity

Today's housing crisis has its origins in a long history of racial discrimination, beginning with the arrival of white European settlers to the Pacific Northwest in the 1840s. At that time Washington was part of the Oregon Territory and subject to the Black exclusion laws that forbade Black people from settling or owning property in the region. Early laws in Seattle barred Indigenous people from residing within city limits.

In the 20th century, land use and housing became tools of racial segregation. Seattle's first zoning ordinance, adopted in 1923, was crafted by a planner who touted zoning's power to "preserve the more desirable residential neighborhoods" and prevent movement into "finer residential districts… by colored people."[2] It established for the first time areas reserved for detached housing, which the City's zoning commission promoted as a way to prevent "lowering… the standard of racial strength and virility," that expanded over time through periodic downzoning.[3]

Racially restrictive covenants reinforced this pattern. Written into private property deeds, racial covenants limited the sale and use of property based on race, ethnicity, and religion, making many Seattle neighborhoods inaccessible to people of color. In the limited areas where people of color were allowed to live, the practice of redlining typically rendered them ineligible for government-backed home loans. To determine areas safe for mortgage lending, the Federal government explicitly referenced neighborhoods' racial composition, citing the presence of racial restrictions in

[1] GAO-20-433
[2] In *The Color of Law*, Rothstein reveals the racial motivations of many regulators who devised zoning schemes to circumvent the 1917 Buchanan decision. See also https://www.epi.org/publication/making-ferguson.
[3] Excerpt from "A Zoning Program for Seattle." Record Series 1651-02 Box 1, Folder 1. Seattle Municipal Archives.

neighborhoods deemed creditworthy while demarcating in red to signify "hazardous" those places with greater shares of people of color.

The legacy of these practices, which the Housing Appendix details further, persists today, visible in the lasting segregation across Seattle, racial wealth and homeownership gaps, and the restricted housing choices and market pressures at the root of our displacement crisis.

Addressing These Challenges

How do we redress this history and address ongoing disparity, high housing costs, and displacement? This Housing element advances three key strategies:

INCREASE HOUSING PRODUCTION

First, the Housing element complements this Plan's Growth Strategy by promoting more housing production overall, of diverse types and throughout all neighborhoods. This is necessary to meet the needs of a diversifying population, keep pace with demand as the region continues to grow, and address past underproduction. This Plan also identifies the need for a streamlined and predictable permitting process for housing.

INVEST IN AFFORDABLE HOUSING

Second, this Plan supports resources, investment, and a variety of tools to address housing needs unmet by the market. Despite historic levels of investment in affordable housing for low-income households, we continue to fall far short of the need. The Housing element identifies the critical need for significant public investment to produce and preserve rental units and to create homeownership opportunities for people with incomes too low to afford housing in Seattle. This Plan also supports land use rules that boost our ability to add income-restricted homes in all neighborhoods.

IMPLEMENT MEASURES TO PREVENT DISPLACEMENT

Third, this Plan supports a broad array of anti-displacement strategies to keep vulnerable households in place and cultural communities intact. Affordable housing itself is a primary anti-displacement measure. Measures to protect low-income tenants from rent increases and eviction and preserve housing affordable to them are critical. Additional tools focus on stabilizing communities, increasing community ownership, and redressing past discrimination and exclusion, particularly for Black and Indigenous communities.[4,]

What is Affordable Housing?

Affordable housing can be created through public subsidy or other action to meet the needs of people who cannot afford market housing. In Seattle, the City's Office of Housing (OH) invests public

[4] Africatown Community Land Trust and E'lip Tilikum Land Conservancy are two examples of these efforts.

resources in the creation and preservation of affordable housing and administers programs that support and stabilize low-income residents. Other public-sector and non-profit organizations, including the Seattle Housing Authority and independent public development authorities (PDAs), also provide affordable housing. Seattle currently has more than 17,000 City-funded affordable units and is a national leader in municipal investment in affordable housing.

Most lower-income households, however, live in market-rate housing. Some market housing may be comparatively lower cost due to its location, size, quality or condition, or other characteristics. Low-cost market-rate housing is both a critical way low-income people find housing in our community — and a distinctly less reliable one since its residents can be vulnerable to sudden rent increases or outright housing loss due to demolition. Low-income households typically pay a large share of their income on housing costs or make other sacrifices like sharing living space with other housemates, delaying having children, or foregoing homeownership.

The term **area median income (AMI)** refers to annual median family income for the Seattle area, which includes King and Snohomish counties, as published by the US Department of Housing and Urban Development, with adjustments for household size. This statistic is used as a benchmark to determine the maximum income of eligible households and the housing cost affordable to households at that income level. Housing regulated by local, state, or federal agencies is for households with incomes at or below a particular AMI level. The maximum rent or sales price for housing varies by unit size, configuration, and amenities. The maximum household income varies by size of household.

The following table approximates the income equivalents for select AMI levels, as adjusted for household size. In this Housing element, policies for City regulated affordable housing refer to households within specific income ranges (generally at or below 60% of AMI for rental or at or below 80% of AMI for ownership) and other policies refer more broadly to households in all categories of need (at or below 120% of AMI). [5]

[5] In Seattle, median income is closer to 77% of AMI for renters and 175% of AMI for owners. While AMI levels are the standard for establishing housing cost limits on income-restricted housing, using a singular AMI for all households in the region fails to capture the substantial disparity in income between renters and homeowners in Seattle.

Figure 13
Area Median Income Levels

Annual Household Incomes by Area Median Income (AMI) Level[6]				
AMI level	**1-person household income**	**2-person household income**	**3-person household income**	**4-person household income**
30% AMI	$30,750	$35,150	$39,550	$43,950
50% AMI	$51,300	$58,600	$65,950	$73,250
80% AMI	$82,050	$93,750	$105,500	$117,200
100% AMI	$102,550	$117,200	$131,850	$146,500
120% AMI	$123,050	$140,650	$158,200	$175,800

Washington state's Growth Management Act requires that jurisdictions "plan for and accommodate" housing affordable to all economic segments of the population. This includes:

- **Permanent housing units** for households with incomes 0-30%, 30-50%, 50-80%, 80-100%, and 100-120% of AMI, accounting for both projected future household growth and existing unmet housing needs at each income level.
- **Permanent supportive housing (PSH)**, which is publicly funded low-income housing paired with on- or off-site voluntary human services to support people living with behavioral or physical health conditions and currently or at risk of experiencing homelessness.
- **Emergency housing** that provides temporary indoor accommodations for individuals or families who are homeless or at imminent risk of becoming homeless in forms such as short-term apartments, hotel rooms, traditional shelter arrangements, shelters for victims of domestic violence, and tiny home villages.

Based on county-level growth projections allocated to cities by the King County Growth Management Planning Council (GMPC), Seattle is responsible for accommodating certain minimum housing needs, totaling 112,000 units for a 25-year period from 2019 to 2044. The greatest need is among extremely low-income households, with more than 43,600 units needed for households with incomes at or below 30% of AMI, which will require substantial subsidy. Subsidy will likely also be

[6] Estimated household incomes for each AMI level in Table X are calculated based on the HUD-published Median Family Income (MFI) for fiscal year 2023 ($146,500 for a family of four), as adjusted for household size. This table is provided for general reference. Income limits for regulated affordable housing vary according to specific housing covenants. Income limits for City-regulated affordable housing are available on the Office of Housing's website.

needed for 19,000 additional units affordable to households with incomes of 30-50% of AMI. The estimated need also includes roughly 8,000 units for households with incomes of 50-80% of AMI, 5,400 units for households with incomes of 80-100% of AMI, and 6,100 units for households with incomes of 100-120% of AMI.

The goals and policies in this Housing element are informed by extensive data and analysis in the Housing Appendix, covering a range of topics that includes housing production, household characteristics, demographic trends, development capacity, and growth targets and future need projections adopted by the GMPC.

Overarching Vision

DISCUSSION

The policies in this section broadly support our vision for housing in 2044, where diverse housing choices, affordable to people of all income levels and suitable to all types of households, exist in every Seattle neighborhood. People who work in Seattle, who relocate from elsewhere in search of opportunity or safety, and who are struggling with housing insecurity or homelessness can all find a stable and suitable place to live. Families can grow and shrink over time and fulfill their changing household needs. Through affordable homeownership, particularly permanently affordable homeownership opportunities, households achieve stability. Affordable rental housing provides flexibility for people at various stages of life and helps make it possible for people to achieve other goals, like saving to buy a home, sending children to college, or starting a business. In this vision, after more than a century of racist and exclusionary housing and land use practices, racial disparities in housing outcomes are closing.

GOAL

H G1 Housing in Seattle provides stability, expands access to opportunity, and closes racial and class disparities for all who seek to live in Seattle.

POLICIES

H 1.1 Implement strategies and programs that preserve, improve, and increase Seattle's housing supply to accommodate current and projected future housing needs, including units affordable to households in all categories of need.

H 1.2 Implement strategies and programs to ensure a range of rental and ownership housing opportunities affordable for Seattle's workforce.

H 1.3 Evaluate housing disparities based on race, ability, income, other protected classes, and geography to identify zoning, programmatic, and investment actions designed to close identified racial disparities and redress past discriminatory housing and land use practices.

H 1.4 Develop housing strategies that reflect the values and meet the specific needs of communities most impacted by housing discrimination and injustice.

Meeting Seattle's Housing Needs

DISCUSSION

Seattle was one of the fastest-growing large cities in the country over the last decade. From 2010 to 2020, the number of jobs in Seattle rose 38 percent, but our housing supply grew by only 19 percent.[7] Simply put, despite recent construction, we have not built enough housing overall to keep pace with employment growth. This shortage has many factors, including barriers in our zoning that limit the type and location of housing built, increases in construction costs, and the complex and lengthy regulatory process homebuilders must navigate. The net result of housing scarcity is greater competition that drives housing prices upward.

Boosting the supply of housing plays a major role in making Seattle and the region more affordable. When housing is scarce, regional growth pushes prices further out of reach. While market housing can cause instability for low-income households vulnerable to sudden rent increases, increasing its supply nonetheless relieves pressure on the finite public resources we can invest in affordable housing. Accordingly, this Plan embraces a dual strategy of expanding the supply of both market and, discussed further below, below-market housing to address our current and future needs. This section promotes expanding production of all housing types.

GOAL

H G2 Seattle's housing supply expands sufficiently to meet current and projected future needs for housing suitable and affordable for all economic and demographic groups.

POLICIES

H 2.1 Expand capacity for housing development broadly to encourage market production that meets short- and long-term housing needs, reduces upward pressure on costs caused by scarcity, accommodates current and projected future growth, and accounts for past underproduction of housing.

H 2.2 Monitor regularly the supply, diversity, tenure, and affordability of housing in Seattle, the impact of development regulations on housing production, and demographic information about Seattle households, and use this information to support and evaluate strategies and policies to meet housing needs and advance racial and social equity.

H 2.3 Promote the production of housing with lower market price points, including by removing regulatory barriers, to meet Seattle's projected 20-year affordable housing needs.

[7] PSRC Covered Employment dataset and 2010 and 2020 decennial Census counts from the U.S. Census Bureau.

H 2.4 Recognize the role of rental housing owners in growing and operating Seattle's housing supply, particularly small-scale apartment buildings, and pursue strategies that help them successfully operate rental housing, maintain health and safety, preserve affordability, and comply with tenant protections.

DISCUSSION

In November 2023, residents voted to renew the Seattle Housing Levy at a record level of $970 million. Even with recent commitments from the City and other public and private funders, the region falls short of being able to meet the full need for rental and ownership housing affordable to people with low incomes over the next 20 years.

The Housing Appendix provides a comprehensive overview of the range of housing assistance programs funded by the City along with an analysis of the gap between existing funds, including City capital funds, and projected housing needs. The City alone cannot fill this gap and there are critical roles for other local governments in the region, state and federal funders, and the private sector.

The policies below guide Seattle towards greater affordability by meeting the needs of households with lower incomes who cannot afford rising rents and sales prices and struggle to withstand the volatility of our housing market. They address both public investment and regulations to achieve this goal and complement the critical role of increasing housing supply to reduce pressure on the finite public resources available for affordable housing. The policies support maintaining and expanding public and private funding to meet the capital and operating, maintenance, and services (OMS) costs of producing and preserving sufficient affordable housing.

GOAL

H G3 People whose housing needs are unmet by the market can live affordably in Seattle.

POLICIES

H 3.1 Pursue public and private funding sources, and advocate for robust federal and state funding, for preservation and production of income-restricted homes, including housing for people with special needs, people experiencing or at risk of experiencing homelessness, and others struggling or unable to afford housing in Seattle.

H 3.2 Expand housing preservation and production programs that ensure long-term affordability for income-eligible households and continue to prioritize efforts that address the needs of Seattle households with incomes 30% of AMI or less.

H 3.3 Create a more diverse and inclusive city by building and preserving income-restricted homes in all Seattle neighborhoods.

H 3.4 Invest in income-restricted homes near frequent transit with the goals of lowering the combined housing and transportation costs of residents, enabling lower-wage workers to live nearer their jobs, and reducing GHG emissions.

H 3.5 Reduce the burden of housing-related costs, including utilities, among households in all categories of need.

H 3.6 Renew investment in existing income-restricted homes to ensure ongoing affordability, health, and safety for residents.

H 3.7 Fund acquisition and rehabilitation of multifamily housing to achieve long-term affordability and housing stability for lower-income households.

H 3.8 Promote and pursue funding for redevelopment of suitable publicly owned sites for income-restricted rental and ownership housing.

H 3.9 Waive or modify development standards and requirements for construction of income-restricted affordable housing to reduce costs, delays, and uncertainty in the development process.

H 3.10 Encourage and advocate for new federal, state, and county laws, regulations, programs, and incentives that would increase the production and preservation of income-restricted homes.

H 3.11 Use a range of tools to create income-restricted homes with new market development, including development regulations, inclusionary zoning, incentives, and permit fee reductions, where the public benefits provided are commensurate with the benefit to the development, are racially equitable, and prioritize housing for households most in need.

H 3.12 Consider using property tax exemption programs, such as multifamily tax exemption (MFTE), to encourage the production of more housing, including affordable, workforce, and market rate homes.

H 3.13 Consider strategies that incentivize owners to upgrade older lower-cost residential properties in exchange for income and rent restrictions on a share of the units.

H 3.14 Consider using substantive authority available through the State Environmental Policy Act to require that new development mitigate adverse impacts on housing affordable for lower-income households.

H 3.15 Consider requiring affordable housing with new development when rezones or changes to development standards significantly increase development capacity.

H 3.16 Create opportunities for households with incomes up to 80% AMI, including families with children, to purchase a permanently affordable home in Seattle.

H 3.17 Support programs that promote homeowner stability, health, and safety, and reduce energy bills and the costs of home repair and weatherization.

H 3.18 Consider requiring production and preservation of income-restricted homes as part of major institution master plans and development agreements to mitigate impacts of housing demolition or employment growth.

H 3.19 Encourage employers to fund housing affordable to their workforces.

Equitable Access to Housing

DISCUSSION

Housing is a basic human necessity that everyone deserves to be able to access, free from discrimination and regardless of their ability to afford prices set by the market. Under the federal Fair Housing Act, landlords cannot discriminate against or in favor of any individual or group based on race, religious, national origin, sex, color, disability, or family status (meaning pregnancy or the presence of children under 18). These are considered protected classes under the law. The State of Washington and City of Seattle have each expanded these protections to additional classes, including marital status, sexual orientation, gender identity, age, use of Section 8 voucher, political ideology, and veteran or military status. These protections increase housing choices for people of all incomes and backgrounds and are fundamental to our vision of an equitable and inclusive city.

Equitable access also includes addressing barriers like zoning that limit the types and location of new housing. In most of Seattle, relatively lower-cost housing forms, like rental apartments, are prohibited. This limits who can afford to live in places with good access to parks, safe streets, and schools and makes it very difficult for the City to invest in affordable homes for low-income households in these neighborhoods. Where past policies and practices explicitly excluded people from these areas on the basis of race, today the high cost of scarce housing perpetuates economic exclusion.

This section supports a variety of actions to remove these barriers by encouraging more diverse, affordable, and accessible housing in all neighborhoods. It includes strategies to ensure the City's investments in affordable homes and other housing resources, like rental assistance, are shared proactively with the households most in need by addressing language barriers, disparities in access to technology, and discriminatory practices.

GOAL

H G4 All people seeking housing in Seattle have fair and equitable access to housing.

POLICIES

H 4.1 Help create a culture where everyone knows, understands, and respects the fair housing rights protected by federal, state, and local laws.

H 4.2 Promote fair housing choices and foster racially inclusive communities free from discrimination through actions like fair housing education and enforcement.

H 4.3 Use tools like affirmative marketing, pre-screening, in-language support, and centralized resources to help housing operators achieve fair housing goals and help households otherwise unlikely to apply for affordable housing become aware of vacancies, feel welcome to apply, and face fewer barriers to accessing housing.

H 4.4 Remove barriers that prevent households from using rental assistance in all Seattle neighborhoods, including by providing information in culturally and language appropriate formats.

H 4.5 Remove zoning and building code barriers that prevent the development of comparatively lower-cost forms of housing, particularly in residential neighborhoods with a history of racial exclusion.

H 4.6 Use development standards and incentives to increase the feasibility of income-restricted homes in all Seattle neighborhoods, particularly to further fair housing in neighborhood residential areas where such housing is scarce today.

H 4.7 Support programs and investments that seek to address racial disparities in homeownership and lending practices, including homebuyer education, capacity building, estate planning, and financial assistance, especially those led by culturally relevant community-based organizations.

H 4.8 Identify and remove barriers to stable housing for individuals and families, like unlawful housing screening practices that restrict access to housing on the basis of criminal history.

H 4.9 Ensure that engagement with the neighbors of proposed publicly funded affordable housing is inclusive and culturally sensitive and furthers fair housing.

H 4.10 Seek to ensure that renter and buyer households in all categories of need benefit and avoid harm from clean energy and other green new deal policies related to housing.

Housing Security and Stable Communities

DISCUSSION

Throughout Seattle's history, growth has not unfolded equitably, leading low-income households and communities of color to experience insecurity and displacement. In the past, this occurred through treaties and laws that forcibly removed Native people from their land and racist practices that restricted access to homeownership, neighborhoods, and opportunity. Today, displacement occurs in a context of rapid population and economic growth, where scarcity and market demand drive unregulated housing and land prices upward, leaving people with less income and wealth and who face barriers to accessing housing most vulnerable to displacement.

In practice, displacement can unfold in several ways:

- **Physical displacement** can occur through eviction, acquisition, rehabilitation, or demolition of housing; when covenants expire on rent-restricted housing; and due to other factors, such as climate impacts.
- **Economic displacement** happens as housing becomes less affordable and residents can no longer weather rising rents or the costs of homeownership, like property taxes.
- **Commercial displacement**, though not directly related to housing, is when these pressures affect small businesses, many of which rent their space and are subject to market prices.
- **Cultural displacement** occurs as residents relocate because their cultural community is leaving, and culturally relevant businesses and institutions lose their customer base or membership.
- **Exclusionary neighborhoods** also fuel displacement by pushing households to lower-cost neighborhoods, increasing pressures on the housing supply there.

While renter households face particular vulnerability due to their exposure to rent increases, homeowners with lower incomes and fewer resources also experience displacement pressure from the burden of property taxes and via predatory behaviors and speculation by investors and developers.

In recent years, the City has built up a range of anti-displacement tools, including robust protections for renters, regulations and funding sources for affordable housing, and investments through the Equitable Development Initiative (EDI) in community-driven and -led projects. The One Seattle Plan envisions a future where growth in Seattle welcomes newcomers, helps community members remain and thrive in place, and creates pathways so former residents who have been displaced can return to their communities. This section establishes a policy basis for the anti-displacement strategies the City will carry out with its partners and community.

GOAL

H G5 As Seattle grows and develops, residents and communities can remain in place and thrive, particularly those facing displacement pressure and who have experienced exclusion and housing discrimination.

POLICIES

H 5.1 Regularly evaluate present and potential future physical, economic, and cultural displacement, particularly among BIPOC communities, immigrants and refugees, low-income people, people with disabilities, and other vulnerable populations, as well as the effectiveness of City efforts to mitigate displacement.

H 5.2 Identify tools and resources to address financial, educational, and regulatory barriers facing homeowners with incomes 120% of AMI or less who seek to retain, redevelop, or add housing on their property, particularly barriers that disproportionately affect homeowners of color and within communities with a documented history of housing discrimination.

H 5.3 Require advance notice to all tenants and payment of relocation assistance to income-eligible tenant households before issuing permits for housing demolition, change of use, or substantial rehabilitation; before removing use restrictions from income-restricted homes; and before a substantial increase in housing costs takes effect.

H 5.4 Analyze and seek to minimize the potential loss of low-cost housing units due to demolition, rehabilitation, or rent increases ahead of zoning and other land use policy changes.

H 5.5 Take steps ahead of zoning changes to protect homeowners against predatory behaviors, such as by reaching out to residents in communities at risk of displacement, disseminating culturally relevant educational resources, and discouraging speculative practices.

H 5.6 Establish requirements and pursue funding for a housing acquisition strategy that creates opportunities for qualified nonprofits to purchase market-rate housing to preserve long-term affordability and maintain or increase housing quality.

H 5.7 Explore tenure conversion strategies that create opportunities for tenants to purchase their housing and support community-based organizations working to help those tenants.

H 5.8 Support the efforts of religious, arts and culture, and heritage organizations, particularly those addressing displacement in BIPOC communities, to develop needed rental and ownership affordable housing.

H 5.9 Provide financial, regulatory, and technical support for community-based developers working to help BIPOC homeowners and prospective homebuyers avoid displacement, achieve or retain homeownership, or return to their cultural communities.

H 5.10 Pursue and support strategies like land banking and housing acquisition in areas with a high risk of displacement and in current and future station areas to increase income-restricted housing choices.

H 5.11 Support the efforts of Native-led and -serving nonprofits and community organizations to acquire and conserve land for affordable housing, cultural space, gathering space, and other programming that honors and meets the needs of urban Native and Indigenous people.

H 5.12 Establish and provide funding to implement a right to legal counsel for tenant households facing eviction who cannot afford an attorney.

H 5.13 Support and strengthen property tax relief for low- and fixed-income homeowners, through deferrals, exemptions, and incentives, including those that may require changes in local, county, or state law.

Diversity of Housing Types

DISCUSSION

Seattle's overall housing supply has increased in recent years, but certain housing types remain in short supply. From 2016 to 2022, 68% of new units were in multifamily buildings with 50 units or more. Townhouses comprised only 15% of new housing units, in part because of limited land area where zoning allows them. Just 6% were new detached homes despite 72% of land zoned for housing reserved for that type. Accessory dwelling unit (ADU) production increased fourfold between 2019 and 2022, demonstrating the demand that exists for smaller, lower-cost homes in high-opportunity neighborhoods, if we allow them to be built.

The multifamily flats that account for most recent housing development are critical for housing our growing population and are affordable to a wider range of households. Zoning for this scale of housing is also vital for income-restricted rental housing, which generally requires capacity for midrise development. In market-rate buildings, most homes are studio and one-bedroom units that provide comparatively lower-cost options, in buildings of four to seven stories at densities that make frequent transit viable.

Still, this narrow range of housing types doesn't work well for all households. The One Seattle Plan sets a course where, by 2044, housing in Seattle meets a broader range of needs, including:

- Creating affordable options suited to families with children and larger households.
- Serving people with accessibility or mobility needs through universal design features and homes without stairs.
- Planning for older adults to age in place with services nearby.
- Increasing condominiums, co-ops, and smaller homes that lower the bar to homeownership.

GOAL

H G6 Seattle offers a full range of housing types that provide opportunity and choice in all neighborhoods for people of various ages, races, ethnicities, cultural backgrounds, and abilities and for all household sizes, types, and incomes.

POLICIES

H 6.1 Allow and encourage a wide range of housing types that meet the needs of current and future households in Seattle.

H 6.2 Explore and implement, where appropriate, strategies to promote innovative and nontraditional housing designs to accommodate residential growth and provide choices with comparatively lower prices, including through incentives, alternative development standards, and pilot programs to test new housing types.

H 6.3 Increase housing opportunities for older adults and people with disabilities by promoting universal design features in new and renovated housing and housing that allows for independent living, various degrees of assisted living, and/or skilled nursing care, particularly near health care and other services and amenities.

H 6.4 Encourage in all neighborhoods the development of housing suitable for families with children, larger households, and multigenerational living that is affordable for households with a broad range of incomes.

H 6.5 Allow and encourage greater production and variety of housing types in Neighborhood Residential zones, including options that lower the bar for entry to homeownership and address the needs of renters, people with disabilities, older adults, and small households.

H 6.6 Promote the construction of small-scale attached and stacked housing, such as by addressing the impacts of code requirements and permitting process on development cost and feasibility.

H 6.7 Advocate for state legislation to encourage production of condominiums and co-operatives, including by mitigating risks associated with warranty liability.

H 6.8 Allow small housing units that, by virtue of their size, might have market rents affordable to people with minimum wage jobs.

Housing Construction, Quality, and Design

DISCUSSION

In addition to meeting the affordability needs of current and future residents, Seattle's housing must also achieve several other critical goals related to safety, health, energy efficiency, and livability. Our homes are where we spend much of our time, especially with the rise of remote work. The indoor environment where we live therefore has a major effect on our physical and mental health, and life safety depends on the quality and durability of the structures we reside in.

The City enforces regulations intended to protect health and safety, like the Residential Code, the Building Code, and the Housing and Building Maintenance Code. Most Seattle households live in rental housing, and the Rental Registration and Inspection Ordinance (RRIO) helps ensure that it is safe and meets basic housing maintenance requirements through regular inspections.

When it comes to climate goals, buildings account for more than one-third of Seattle's GHG emissions, and housing comprises a large portion of new construction in Seattle. Reducing energy usage and promoting resiliency strategies in new and existing housing is an important way we can prepare for the effects of climate change and reduce impacts on our most vulnerable residents in the future.

This section promotes a range of strategies to ensure that the city's housing supply achieves these objectives, and it does so in a way that makes benefits available for all, regardless of income, race and ethnicity, disability, national origin or citizenship, or household type, and mitigates impacts on lower-income households, including potential risk of displacement or retaliation as a result of code enforcement.

GOAL

H G7 Seattle's housing supply is healthy, safe, and carbon-neutral, reflects and embraces culturally relevant design principles, and can adapt to changing demographic conditions.

POLICIES

H 7.1 Provide programs, regulations, and enforcement to help ensure that all housing is healthy and safe and meets basic housing-maintenance requirements.

H 7.2 Adopt zoning, development, and permitting standards that accommodate or incentivize new construction methods and materials, including mass timber, cross-laminated timber (CLT), and similar wood-based building products that promote circular and bio-economic benefits, and encourage further innovation in residential design, construction, and technology to reduce carbon footprints, accelerate building assembly, and provide seismic durability.

H 7.3 Implement regulations and incentives for housing construction and operations to conserve water, energy, and materials; reduce greenhouse gas emissions; limit water runoff; create habitable and healthy indoor environments; and reduce other environmental and health impacts.

H 7.4 Support property owners to electrify their buildings and make other climate resiliency and energy efficiency retrofits, such as cooling, prioritizing assistance that benefits lower-income households.

H 7.5 Promote opportunities to combine housing and historic preservation efforts by rehabilitating structures of historic value for residential use.

H 7.6 Explore strategies for converting nonresidential uses to housing, particularly those that produce units for households unable to afford market housing costs.

H 7.7 Adopt development regulations that encourage new construction or modification of housing that accommodates the needs of older adults, including accessible units, intergenerational care facilities, and community space suited to elders.

H 7.8 Promote and remove barriers to construction of new construction or modification of housing that incorporates accessibility and universal design features to meet the needs of people of all abilities.

H 7.9 Promote unit, building, and site designs and layouts that accommodate and incorporate open space, communal areas, and gathering spaces to support cultural placemaking, community cohesion, shared living, and belonging.

H 7.10 Promote, reflect, and accommodate Native art, language, traditional knowledge, and design principles in Seattle's housing, based on the guidance of Indigenous artists, architects, and designers.

Homelessness

DISCUSSION

Homelessness remains one of the biggest challenges confronting Seattle. In 2015, the City first declared a State of Emergency for homelessness. Despite intentional efforts and substantial spending, the emergency has worsened since the beginning of the COVID-19 pandemic. While support for shelter, outreach, services, and other resources is critical, the only way to ensure lasting progress on the homelessness crisis is to address the housing affordability crisis.

Homelessness is fundamentally a housing issue with multiple root causes and contributing factors, including:

- **Affordability.** Homelessness starts with an inability to afford a safe place to reside indoors. In Seattle, challenges like rising home prices, scarce affordable housing choices, and income inequality are particularly acute. When residents lack a strong safety net and stable housing is unaffordable, the loss of a job, medical expenses, or other economic hardships can precipitate homelessness. Youth who age out of foster care at age 18 often struggle to access assistance, with more than one-third becoming homeless within one year.[8]
- **Equity.** Homelessness disproportionately impacts people of color, especially Black and American Indian/Alaska Native communities who have been impacted by a long history of race-based discrimination in housing, land use, and finance. These communities compriseonly 7% of the total County population, but together comprise about 35% of the households receiving homelessness services in King County.
- **Health.** Homelessness can both produce and result from physical and mental health challenges, including addiction. The longer people remain unsheltered, the more likely they are to need help. Breaking this cycle requires urgent action to bring people indoors and provide health services.

To meet this enormous challenge, the region's approach centers on rapidly reducing the number of people currently forced to live outside by substantially expanding both temporary shelter and permanent housing options. As of 2023, Seattle has approximately 4,335 of the 25,734 temporary shelter spaces and 5,230 of the 20,255 permanently supportive housing units estimated to be needed by the end of 2044.

[8] https://kingcounty.gov/~/media/depts/community-human-services/housing-homelessness-community-development/documents/one-table/one-table_all.ashx?la=en#:~:text=CHILD%20WELFARE%20SYSTEM%20One%2Dthird,to%20obtain%20housing%20and%20employment.

The homelessness services system currently comprises the following the types of housing interventions:

Emergency Shelter

Homeless shelters provide a place for people and families experiencing homelessness to find safety, protection from exposure to weather, and an opportunity to connect with services on their path to permanent housing. Various types of emergency shelter differ based on certain key characteristics, including:

- Overnight versus 24/7 hours of operation
- Ability to "drop-in" to access to shelter
- Congregate versus non-congregate
- Hot meals or options for kitchens
- Ability to bring pets or partners
- Ability to store belongings for extended periods
- Permitted length of stay
- Populations served (single adults, families, youth and young adults, culturally specific, etc.)
- Availability seasonally or during severe weather events

"Congregate" refers to communal sleeping arrangements in emergency shelter settings; "non-congregate" describes a setting with single-room occupancy and/or separate rooms. During the COVID-19 pandemic, the benefits of non-congregate shelters, including micro-modular shelters, tiny house villages, and hotel/motel shelters, became apparent, with several studies demonstrating its correlation with improved short-term health outcomes.[9] Having a space separate from other people and safe for belongings provides privacy and stability and improves overall wellness and service connections. For that reason, non-congregate shelters of all kinds constitute a substantial area for further temporary housing expansions.

Transitional Housing

Transitional housing is a specific program, defined by the federal Department of Housing and Urban Development (HUD), that provides temporary housing with supportive services to individuals and families experiencing homelessness with the goal of interim stability and support to successfully

[9] Fleming MD, Evans JL, Graham-Squire D, et al. Association of Shelter-in-Place Hotels with Health Services Use among People Experiencing Homelessness During the COVID-19 Pandemic. JAMA Network Open. 2022;5(7): e2223891. doi:10.1001/jamanetworkopen.2022.23891; The Promise of Service-Enriched, Hotel-Based Housing as an Alternative to Congregate Shelters for High-Need Persons Experiencing Homelessness | Emergency Medicine | JAMA Network Open | JAMA Network

move to and maintain permanent housing. Transitional housing can provide housing and accompanying supportive services at no cost for program participants for up to 24 months.

Rapid Rehousing

Rapid Rehousing (RRH) is a low-barrier, time-limited intervention connecting households experiencing homelessness to permanent housing through a tailored package of assistance, including short-term rental assistance and supportive services, without any pre-conditions or requirements (such as employment, income, absence of criminal record, or sobriety). RRH includes three core components: 1) housing identification, 2) move-in and rental assistance, and 3) housing-focused case management services and supports. Housing-focused case management is provided, with an emphasis on immediate efforts to secure housing, using the minimum assistance necessary to resolve each household's immediate housing crisis.

Prevention and Diversion

Prevention and diversion activities help individuals and families minimize time spent homeless or averting it altogether. Program participants can receive short- and medium-term tenant- or project-based rental assistance as well as assistance with rental arrears, rental application fees, security deposits, last month's rent payments, utility deposits and payments, moving costs, housing search and placement, housing stability case management, mediation, legal services, and credit repair.

GOAL

H G8 Homelessness is rare and brief, people experiencing homelessness secure housing and supportive services, and shelter is available as an interim, emergency step toward permanent and stable housing.

POLICIES

H 8.1 Implement strategies and programs that preserve, improve, and expand Seattle's supply of permanent supportive housing, emergency housing, and shelter to meet all current and projected future needs.

H 8.2 Support strategies and actions that ensure sufficient overall housing supply, including and especially permanently supportive housing and housing affordable to households with incomes at or below 50% AMI, to aid in the City's ability to reduce and respond to homelessness.

H 8.3 Identify and implement a robust range of anti-displacement strategies and interventions that address the needs of people and households at high risk of becoming homeless.

H 8.4 Collaborate with King County and other jurisdictions in efforts to prevent and end homelessness and focus those efforts on providing permanent housing with supportive services, expanding safe temporary shelter, and securing the resources to do so.

H 8.5 Support efforts to respond to homelessness among the Native American population, particularly strategies identified, and services provided by Native-led organizations.

H 8.6 Support and remove regulatory barriers to siting a small home for an individual or household experiencing homelessness on the property of homeowners throughout Seattle.

Capital Facilities

Introduction

Capital facilities are major assets that have a long useful life. Maintaining, improving, and expanding capital facilities is critical for sustaining a high-quality of life as the city grows and making our facilities more efficient, carbon neutral, and equitable. The City cannot fully deliver on our City service or policy priorities without investments in the places where our City workforce performs their work and where community members meet their needs, especially in areas planned for future growth and development.

The Capital Facilities element addresses facilities owned by the City and managed by various City departments: police and fire, parks and recreation, libraries, neighborhood service centers, City office space, arts and cultural space, the Seattle Center, the Central Waterfront, animal shelter, training facilities, and various shops, yards, and warehouses. The facilities and infrastructure of City-operated utilities are also capital facilities but are funded mostly by rate revenues (and are covered in the Utilities element of this Plan). Capital facilities owned and managed by other public entities

that serve Seattle residents include schools, hospitals, and transit. The City also funds community-led capital projects, including projects that are designed to counter displacement or address past discrimination and community underinvestment. Examples of recent community-led capital projects include cultural spaces, affordable housing, open space, and early learning facilities.

Each year the City funds capital facility projects including new facilities, improvements to existing facilities, and rehabilitation or restoration of existing facilities. Projects may address an existing deficiency, a community need related to growth, or community needs not related to growth but that enhance the quality of life. Overall, the City's network of capital facilities, serving an area that is already highly urbanized, is generally sufficient to accommodate forecasted housing and job growth through 2044. While some facilities may require replacement, most capital investments are dedicated to improving existing facilities to extend their useful life: seismic retrofits, decarbonization, climate adaptation, and other natural hazard retrofits. See the Capital Facilities appendix for inventories of current capital facilities and a discussion of future needs.

The Capital Facilities element provides guidance for all City-owned capital facilities as well as guidance for coordination with other public entities that serve Seattle. Policies in this element apply to all City-owned capital facilities including transportation, utility, and park facilities with additional policy guidance provided in other elements. The Capital Facilities appendix includes an inventory and analysis of future need for City-owned facilities, as well as information about capital facilities owned by other public entities. Policy direction, inventories, and forecast of future need for some capital facilities are addressed in other elements and appendices (see Figure 14). The Capital Facilities element includes a six-year plan for financing capital facilities. This information is contained in Seattle's Capital Improvement Program which is updated as part of the City's annual budget process and is included in this Comprehensive Plan by reference.

Figure 14
Capital Facilities Providers and Information Sources

PUBLIC ENTITY	CAPITAL FACILITIES IN SEATTLE	ELEMENTS W/ POLICY GUIDANCE	APPENDIX
Seattle Department of Transportation	Local rights of way including roadways, bicycle and pedestrian infrastructure, shoreline street ends, public open spaces within the ROW	Capital Facilities Transportation Parks and Open Space	Transportation
Sound Transit	Light rail, commuter rail, and bus rapid transit stations and facilities	Transportation	Transportation
King County Metro	Bus and water taxi facilities	Transportation	Transportation
Amtrak	Passenger rail facilities	Transportation	Transportation

PUBLIC ENTITY	CAPITAL FACILITIES IN SEATTLE	ELEMENTS W/ POLICY GUIDANCE	APPENDIX
Washington State Dept. of Transportation	State and interstate highways, ferries, and ferry terminals	Transportation	Transportation
Port of Seattle	Marine, rail, and air intermodal facilities, public open space	Transportation	Transportation
Seattle Department of Parks and Recreation	Parks, greenbelts, athletic fields, sports courts, golf courses, viewpoints, trails, recreation facilities, boating facilities, community centers, environmental centers, art facilities, crew quarters, equipment storage	Capital Facilities Parks and Open Space	Capital Facilities
Seattle City Light	Electrical distribution systems, streetlights, EV charging stations	Capital Facilities Utilities	Utilities
Seattle Public Utilities	Sewer and drainage systems, solid waste transfer stations, green infrastructure,	Capital Facilities Utilities	Utilities
Seattle Department of Finance and Administration	SFD facilities, SPD facilities, offices (owned and leased), various shops and yards, warehouses, communications, animal shelter, social service facilities, senior and community centers, service centers	Capital Facilities	Capital Facilities
Seattle Public Library	Central Library, branch libraries	Capital Facilities	Capital Facilities
Seattle Center	Buildings and public open space at Seattle Center campus and the Central Waterfront	Capital Facilities	Capital Facilities
Seattle Information Technology	Data, telephone, and radio networks; data centers, servers, storage, and backup; video production facility	Capital Facilities Utilities	Capital Facilities
Seattle Public Schools	Schools, administrative offices, athletic facilities, support buildings	Capital Facilities	Capital Facilities

Strategic Planning and Investment

DISCUSSION

The City leverages funding from federal, state, and regional governments to augment City funds and utility revenues to maintain and improve our capital facilities to meet the city's needs as we grow. The investment decisions we make will have long-term implications for our ability to serve a changing population. Establishing strategic priorities for our investments will help the City implement needed improvements efficiently and with limited resources.

Priorities for investment reflect our shared values such as equity, sustainability, life/safety, as well as regulatory requirements in developing and prioritizing capital facility projects. Additional prioritization criteria may be introduced by certain funding sources, state and federal laws, and City resolutions, ordinances, and Executive Orders.

GOAL

CF G1 The City sets clear priorities among potential capital projects to meet the needs of a growing city and to maximize long-term environmental, economic, equity, health, and other benefits.

POLICIES

CF 1.1 Identify new or improved capital facilities needed to support the location and intensity of housing and employment growth anticipated in the growth strategy.

CF 1.2 Implement processes for regularly evaluating capital facility needs, updating planned projects and funding to meet these needs, and, where probable funding for capital improvements falls short of projected needs, identify additional funding sources and/or land use strategies, as appropriate.

CF 1.3 Identify and periodically review criteria to help set priorities among potential capital facility investments, including consideration of equity and displacement risk.

CF 1.4 Identify opportunities to co-locate capital facilities that include multiple uses, mixed-use development, joint-use, reuse, and repurposing of existing City-owned land and buildings.

CF 1.5 Initiate inter-departmental and inter-agency coordination in early planning for new facilities or repurposing of existing public lands and buildings, especially for affordable housing or other priority uses.

CF 1.6 Protect, enhance, and adaptively reuse City-owned historic facilities.

Sustainable Design and Construction

DISCUSSION

The City of Seattle owns and maintains over 650 buildings totaling approximately 10 million square feet. Each year existing facilities are improved, and some new facilities are built. In addition, the City manages more than 110,000 acres of public land, including land outside the city boundary. To reduce its environmental impact, the City has adopted policies and programs to address the sustainability of new building construction and major renovations, as well as day-to-day operations. These policies are more urgent as we increase efforts to combat climate change and adapt to its impacts. Reducing the environmental impacts related to capital facilities can also address environmental justice goals.

The City adopted its first Sustainable Building Policy in 2000, and a more ambitious policy in 2011, to improve the environmental performance and resiliency of City-owned buildings, sites, and natural environments. The policy drew from national, regional and local sustainability rating systems including 2030 Challenge, Capital Green, Evergreen Sustainable Development Standard, Ideal Green Parks, Leadership in Energy and Environmental Design, Living Building Challenge, and Sustainable Sites Initiative. These policies not only achieve substantial cost savings but also demonstrate leadership by raising public awareness of the benefits of climate pollution reductions, promoting clean energy, energy and water efficiency, nature-based solutions, natural environment restoration and inspiring others to adopt similar practices.

Since 2011, the design and construction industry has continued to innovate and introduce new approaches and standards that the City may include in future Sustainable Building Policy updates.

GOAL

CF G2 Capital facility projects are designed to achieve resiliency, sustainability, high levels of environmental performance, zero climate pollution, and minimal environmental impacts consistent with principles of environmental justice.

POLICIES

CF 2.1 Periodically review and amend Seattle's Sustainable Building Policy to reflect best practices, innovations, and other City priorities, such as reductions in embedded carbon, improved indoor air quality, and impacts on the natural environment., .

CF 2.2 Meet the minimum requirements of the adopted green building standard and pursue opportunities to achieve a higher level of environmental sustainability and resilience through capital facility pilot projects.

CF 2.3 Establish minimum standards for construction practices, building and landscape features not yet included in the Sustainable Building Policy or required by the Land Use Code.

CF 2.4 Achieve high levels of energy and water efficiency in capital facilities.CF 2.5 Employ landscape best management practices that achieve multiple environmental, economic, and social health benefits in capital facilities.

CF 2.6 Site and design new capital facilities, or adapt existing capital facilities, to be resilient to climate impacts and other natural hazards, such as earthquake and liquefaction-prone areas, to ensure capital facilities function as intended over their planned life cycle.

CF 2.7 Adapt existing capital facilities to be resilient to the impacts of climate change, natural hazards, and human-made disasters.

CF 2.8 Promote physical activity in the design of capital facilities through features such as the placement and design of stairs, elevators, and indoor and outdoor spaces.

CF 2.9 Incorporate and integrate art into facility design, such as by including artists on the design team and integrating commissioned art into the building and site design.

CF 2.10 Site capital facilities in locations that support efficient delivery of services, are accessible to the general public, especially pedestrians, cyclists, and transit users, maximize value to local community, especially communities that have experienced historical underinvestment, avoid the impacts of climate change, and minimize impacts to the natural environment.

CF 2.11 Support the City of Seattle's tree canopy cover goals by maximizing tree canopy cover potential of capital project sites where compatible with proposed uses.

CF 2.12 Design capital facilities so they feel safe and welcoming to a wide variety of people,

CF 2.13 When designing or renovating capital facilities, consider Including building features that can help shelter displaced residents during emergencies.

CF 2.14 Where applicable, design new capital facilities to incorporate reused and recycled content building materials and to better enable deconstruction at the building's end of life.

CF 2.15 Prioritize adaptive reuse or deconstruction for aging or surplus capital facilities.

CF 2.16 Where feasible, include public restrooms in capital facilities to increase public access to toilets, handwashing, drinking water and baby changing tables.

Equitable Capital Facilities and Services

DISCUSSION

In the past, the planning of capital facilities did not fully consider impacts on marginalized and communities and vulnerable populations. This has resulted in a distribution of public amenities and

necessary facilities with inequitable benefits and impacts for adjacent communities. We recognize the impacts of climate change disproportionately affect vulnerable populations, making it harder for them to avoid and recover from climate impacts. The City's commitment to race and social justice has changed the capital planning process to ensure equity is considered in the earliest stages of planning.

The City has increased funding to support community-initiated capital projects. Communities play a role in initiating capital projects implemented by City departments and in directly developing capital projects that involve land, buildings, and other physical structures. This model is especially important in communities that have experienced past disinvestment and harm. This community-driven model for capital projects has proven successful for various capital facilities and builds the capacity of community organizations.

The City is leveraging its capital investments to expand opportunities for underrepresented communities, as well as women- and minority-owned contractors. For example, the City's Priority Hire Community Workforce Agreement and its Public Works Women Minority Business Enterprise Inclusion Plan are designed to benefit women and minorities who have been excluded from City contracting in the past.

GOAL

CF G3 Capital facilities improve the living conditions for underserved communities, address historical community under-investment, and distribute services and amenities equitably to all residents.

POLICIES

CF 3.1 Make capital facilities accessible in physical design, language, and affordability, and relevant to people of all abilities, socioeconomic backgrounds, ages, and cultures.

CF 3.2 Locate new capital facilities where they would support a more equitable distribution of services and address the needs of underserved communities.

CF 3.3 Apply consistent and equitable standards for the provision of community and customer amenities when they are needed to offset the impact of construction projects, ongoing operations, and facility maintenance practices.

CF 3.4 Seek to mitigate environmental and displacement impacts from the construction or operation of capital facilities on adjacent communities, especially lower-income residents, small locally owned businesses, and communities that already bear a disproportionate amount of such impacts.

CF 3.5 Adapt existing capital facilities to better meet the needs of an increasingly diverse population.

CF 3.6 Improve City-owned, community-serving facilities, such as libraries and community centers, to support emergency response associated with natural disasters and extreme weather events, especially facilities located in frontline communities.

Improvements could include seismic retrofits, air conditioning, air filtration, and backup energy sources.

CF 3.7 Create training opportunities and living wage jobs, particularly for underrepresented groups and residents, through capital facility investments.

CF 3.8 Expand the capacity of community-based organizations in underserved communities to plan and implement community-led capital projects to better meet community needs.

CF 3.9 Consider alternate service delivery models that may be more resource efficient or that could better reach underserved communities.

CF 3.10 Structure user fees and scholarships to mitigate disproportionate cost burdens on low-income households.

CF 3.11 Prioritize investment in Seattle Public Library programs and resources so that they remain free and open to all.

Facility Operations and Maintenance

DISCUSSION

The operation and maintenance of existing capital facilities affects the efficient use of resources, resiliency, and climate pollution. Maintaining capital facilities ensures these investments achieve long and productive service, avoid the need for the construction of new facilities, and reduce climate pollution. The policies below apply to daily operations and monitoring of these facilities, as well as minor improvements to them.

GOAL

CF G4 The City's capital facilities optimize efficient and effective operations and maintenance to prolong their service lives.

POLICIES

CF 4.1 Employ energy benchmarking and building tune-ups for capital facilities.

CF 4.2 Develop and implement maintenance plans for capital facilities to make efficient use of limited financial and physical resources.

CF 4.3 Manage existing facilities with a resource-conservation approach to reduce energy use, water use, stormwater impacts, and utility costs.

CF 4.4 Plan for and provide resources for all municipal buildings to operate without fossil fuel systems and appliances by no later than 2035.

CF 4.5 Manage existing capital facilities to maintain healthy and safe conditions for occupants, users, neighboring businesses, and residents.

Non-City Service Providers

DISCUSSION

In addition to directly providing services through its own capital facilities, the City works with other entities that serve Seattleites. These include Seattle Public Schools (see next section), Public Health—Seattle & King County, Washington State, and King County, as well as other jurisdictions and nonprofit organizations. This can include joint planning, funding other service providers, and allowing other entities to use City-owned property. Working together, we can better provide services to Seattle's residents as the city grows.

GOAL

CF G5 Facilities and services provided by non-City agencies and organizations will equitably and efficiently meet the needs of Seattle's communities.

POLICIES

CF 5.1 Collaborate with other public and nonprofit organizations to construct or expand community-based facilities or public amenities.

CF 5.2 Work with other public or nonprofit agencies to identify and pursue co-location, joint-use, and temporary use opportunities in public facilities for community programs, services, performances, exhibits, and meetings.

CF 5.3 Join with other jurisdictions in King, Snohomish, Pierce, and Kitsap counties to explore regional funding strategies for capital facilities, especially those that serve or benefit residents regionwide.

CF 5.4 Use nontraditional strategies for service delivery, such as the leasing of City-owned buildings or funding of non-City facilities, where they would provide greater benefit to communities.

Public School Facilities

DISCUSSION

Seattle Public Schools (SPS) builds and operates public schools and pre-schools within the City of Seattle. As of the 2022-23 school year, SPS operates 105 schools serving about 50,000 students. The average age of SPS buildings is 64 years. Seventy-eight buildings are more than 50 years old, including 19 more than 100 years old as of 2021. The district also has 34 buildings that are designated City of Seattle Landmarks with nine others with the potential for landmark designation.

SPS prepares a ten-year Facilities Master Plan to project future capital building/facility needs. At the time of the 2021 update to the Facilities Master Plan, enrollment shifts during the COVID-19 pandemic created uncertainty about how those changes might affect future enrollment and capacity. Even before the pandemic, SPS experienced a leveling off of growth rates, perhaps due to falling birth rates, the high cost of housing in Seattle, or other factors.

SPS uses a variety of information to assess the need for capital investment in its school campuses, including building condition, learning environment assessment, student enrollment trends, and building capacity and equity tier designation. Over the next decade, shifts in enrollment may require consolidations and/or closures. Also, SPS has committed to transitioning facilities off fossil fuels for all its operations no later than 2040.

The City and SPS collaborate in planning for educational facilities. They have a joint use agreement to share recreation facilities. SPS is a major partner in hosting the Seattle Preschool Program. The City shares data about population and housing growth to inform enrollment projections and SPS facility master planning. The City works closely with SPS to permit new schools that may require zoning variances and to support transportation improvements to make it safer to walk, bike, and roll to schools.

GOAL

CF G6 Seattle has a system of zero-carbon emission school campuses that support high-quality instruction and learning experiences and meet the educational needs of a growing city.

POLICIES

CF 6.1 Coordinate with SPS to plan for expected amount and distribution of growth in student population.

CF 6.2 Explore opportunities to reduce the costs of developing new schools, such as identifying surplus properties that could be available for school sites.

CF 6.3 Facilitate zoning and permitting processes that support the development of new or renovated schools, and where providing non-educational community benefits, the adaptive reuse of any surplus schools.

CF 6.4 Collaborate with SPS and the community to explore if underutilized or surplused school buildings and properties can be redeveloped for other purposes, such as affordable housing, childcare, workforce development opportunities or enhancements for public safety.

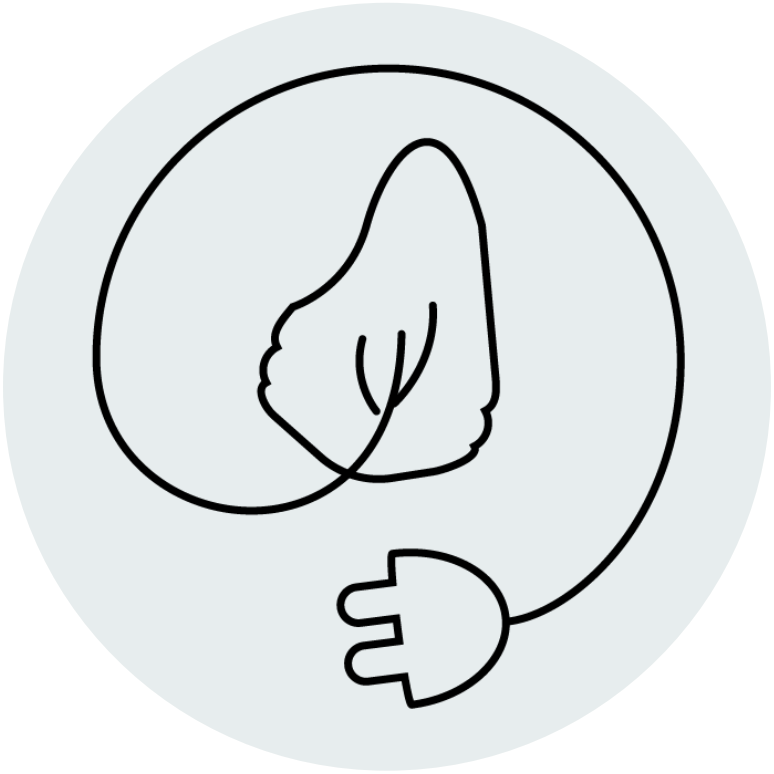
CF 6.5 Expand opportunities for joint use by the City and SPS of buildings, playing fields, and other facilities.

CF 6.6 Coordinate pedestrian and bicycle infrastructure to make it easy and safe for students and families to walk, bike, and roll to school.

CF 6.7 Encourage more walking, biking, and transit ridership for students, teachers, and staff.

CF 6.8 Support efforts to transition SPS buildings, operations, and transportation from fossil fuels toward 100% zero-carbon electricity.

CF 6.9 Encourage SPS to preserve and improve open space when redeveloping school sites, where balanced with SPS educational program needs.



Utilities

Introduction

Utilities are basic services that keep the city working. As a highly urbanized area, Seattle has a fully developed and comprehensive utility infrastructure system. This system provides energy, drinking water, water for fire suppression, drainage, sewers, solid waste management, and communication services throughout the city. These services are managed by different public and private providers that often share space, above and below ground, within City-owned rights-of-way. Utility providers include:

- Seattle City Light, a City-owned utility, provides electricity throughout the city and beyond the city boundaries.
- Seattle Public Utilities, a City-owned utility, provides drinking water, drainage and sewer systems, and solid waste services within the city limits. In addition, it provides water service directly or indirectly to much of King County.

- The Seattle Information Technology Department maintains an extensive data and fiber optic network. It shares conduit installation and maintenance with multiple partners, leases excess fiber capacity to private providers, and regulates cable TV service within the city.
- King County provides combined drainage and sewer services in portions of Seattle and is responsible for treating all wastewater generated in the city.
- Puget Sound Energy, a privately owned utility, provides natural gas in Seattle.
- CenTrio, a privately owned district energy company, provides thermal energy including steam, hot water, and chilled water to buildings in downtown Seattle.

Additionally, multiple companies provide broadband high speed internet services, mobile and landline phone services, and associated infrastructure. As the regulator of the public right-of-way, the City has limited control over private utilities. However, its agreements with various service providers help ensure technical quality, protect customer rights, and support public services.

As Seattle continues to grow over the coming years, the utilities are preparing to serve additional customers and invest in infrastructure as needed. With proper maintenance, smart strategic planning, and adequate financial resources the existing infrastructure can be adapted or replaced to support the City's broader goals of sustainability, carbon neutrality, economic efficiency, and equitable service access for all Seattleites. To thrive over the next 20 years, utilities will need to address aging buildings, facilities, and systems, and respond to changing needs, technologies, climate change impacts, decarbonization, and other factors.

The Utilities element outlines goals and policies that will guide City decisions about providing and improving utility services and addressing emerging issues. Seattle City Light and Seattle Public Utilities periodically prepare various plans and studies that guide the work of the utilities to support the adopted Growth Strategy in this Plan.

An inventory of existing utilities, along with analyses of potential future needs, is in the Utility Appendix. More detailed information about utility infrastructure can be found in specific plans and studies by Seattle City Light and Seattle Public Utilities.

Information on planned and funded projects for City-owned utilities is contained in Seattle's Capital Improvement Program which is updated as part of the City's annual budget process and is part of this comprehensive plan by reference.

Utility Services to Support Future Growth

DISCUSSION

While adequate capacity currently exists to provide electricity, drinking water, drainage conveyance, and waste disposal to serve growth over the next twenty years, it is important that the City and utility providers continue to monitor and make investments as needed to ensure our continued ability to fully serve both existing and future residents, businesses, and other users. Just as important, proper stewardship of these resources is vitally important for meeting the other key

goals, including reducing impacts on the environment, reducing greenhouse gas emissions, and preparing for climate change.

GOAL

U G1 Utility infrastructure and services support existing and new development consistent with the Growth Strategy.

POLICIES

U 1.1 Establish and maintain performance metrics that can be used to monitor and evaluate capacity of City-owned utilities to meet the need for utility services as the city grows.

U 1.2 Regularly consult with non-City owned utilities to ensure utility needs are met as the city grows.

U 1.3 Ensure that new private development provides adequate connections to the existing utility infrastructure and is water and energy efficiency.

Equitable Utility Services and Community Partnerships

DISCUSSION

Seattle's utility providers are committed to making racial equity central to the development and delivery of services, fees, programs, education, employment, contracting, and outreach. Systems planning includes targeted outreach to ensure that the burdens and benefits of high-quality utilities infrastructure are distributed equitably throughout the city. Future infrastructure investments will help rectify existing environmental and service disparities while supporting the health and economic opportunity of underinvested communities. Utility programs and partnerships with private providers help make services affordable for low-income households. Priority hiring and workforce development programs create more opportunities for those excluded by past discrimination.

GOAL

U G2 Safe and reliable utility services are accessible and affordable to community members regardless of economic, racial, or housing status, or ability to pay.

POLICIES

U 2.1 Set equitable performance standards that account for existing community conditions, how decisions will impact varied geographic and socioeconomic groups, and service equity as a criterion in decision-making.

U 2.2 When and where feasible, make utility services as affordable as possible through equitable delivery of utility discount programs, incentives, and customer assistance.

U 2.3 Implement community-driven processes that promote shared decision-making in utility investments.

U 2.4 Maximize co-benefits and community benefits of utility investments.

U 2.5 Broaden the public health outcomes of utility investments to include social and environmental health.

U 2.6 Create and expand opportunities for low-income households to participate in utility conservation and efficiency programs provided by City-owned utilities and private utilities and vendors.

U 2.7 Create training and living wage job opportunities, particularly for underrepresented populations, through investments and agreements with private utilities and vendors.

U 2.8 Cultivate a utility workforce with the skills and knowledge to align with evolving technologies, business needs and advance social justice.

U 2.9 Support community entrepreneurship and wealth building programs that focus on environmental stewardship and utility infrastructure management.

U 2.10 When feasible and consistent with City rate policies, explore options to lower upfront and operating utilities costs to enable affordable housing providers to build cost-effective, resilient, energy- and water-efficient, all-electric projects.

Coordinated Utility Projects

DISCUSSION

Above, below, and on the ground, Seattle's roads, paths, and other right-of-way spaces contain a vast array of utility infrastructure. Pipes, conduits, wires, poles, service vaults, storage tanks, pollution-control structures, streetlights, gutters, swales, and infiltration facilities are carefully integrated into the city's overall landscape. Increasingly this space also includes non-City utility infrastructure such as fiber, cable, natural gas lines, district steam, and small cell wireless. Due to limited space, placement and maintenance of this infrastructure must be carefully managed. The City must work to minimize conflicts between the utilities and other uses of the right-of-way, and ensure that infrastructure investments are well maintained.

At the same time, new investments in these facilities—particularly projects that result in opening the pavement—also provide opportunities to improve a variety of existing facilities and meet multiple objectives. Consequently, the City should look for opportunities to share costs, undertake joint projects, or otherwise consider the goals of other departments when undertaking projects in the right-of-way.

The City works with non-City utilities, such as natural gas, district energy, and communications providers. The City reviews street use permits, coordinates projects, creates development and leasing policies, and executes franchise agreements or programmatic term permits. These relationships offer opportunities to improve service provision for customers, reduce the impacts of

construction, and encourage non-City utilities to work toward City goals. Specific policies about the location of communications facilities are included in the Land Use element.

GOAL

U G3 Utility projects are coordinated to meet utility needs, maximize community benefits, increase safety, minimize costs and disruptions to the community, and align with the City's climate goals.

POLICY

U 3.1 Coordinate planning for utility projects among City-owned utilities, City departments, and non-City utilities, particularly projects located in the right-of-way, to lower costs, improve outcomes, provide co-benefits, limit construction and operational impacts and increase climate and seismic preparedness.

U 3.2 Align utility investments with mobility, open space, extreme heat mitigation, and other improvements.

U 3.3 Build partnerships among City departments, non-City-utilities, public agencies, Tribal governments, and community organizations to increase capacity for collaboration in utility planning and projects.

U 3.4 Provide affected non-City utilities with timely and effective notices of planned road and right-of-way trenching, maintenance, and upgrade activities.

U 3.5 Give data and telecommunication service providers equitable access to the right-of-way to support competition and to better serve their customers.

Water System

DISCUSSION

Water is our most precious resource and essential to everything we do. One Water is an approach adopted by Seattle to carefully manage all water systems in an integrated, inclusive, and sustainable manner. The City designs and implements its drinking water, drainage, and wastewater systems projects and programs with a focus on achieving multiple benefits—economic, environmental, and social. Investment in communities disproportionately affected by water issues is prioritized to ensure everyone has equal access to clean drinking water, drainage, and wastewater services.

There is much uncertainty about the impacts of climate change on these systems, making resiliency a priority in coming years. The City will continue to make significant investments in the water system to protect public health, comply with federal and state regulations, replace aging infrastructure, improve system performance in the event of an earthquake, aid salmon recovery, and address impacts of climate change. These investments are carried out in ways that keep utility rates affordable.

GOAL

U G4 Water is treated as an essential resource and managed in a sustainable and integrated way to support healthy natural environment and communities.

POLICIES

U 4.1 Provide reliable, affordable, high quality drinking water.

U 4.2 Promote water efficiency strategies to reduce per capita water use by customers.

U 4.3 Reduce the impacts of flooding and sewer backups from the public drainage and wastewater system into private property and the public right of way, and prioritize neighborhoods that have experienced historical disinvestment.

U 4.4 Protect water quality, improve aquatic health, and reduce combined sewer overflows to benefit all life that relies on our local waterbodies.

U 4.5 Treat stormwater runoff, especially runoff from roadways and other high pollutant generating surfaces, using green stormwater infrastructure and other best management practices.

U 4.6 Periodically update climate vulnerability assessments of the water supply system and the drainage and wastewater system.

U 4.7 Invest in water infrastructure that can adapt to future challenges and build system resiliency, especially in areas most vulnerable to environmental hazards.

U 4.8 Increase the resiliency of water supply watersheds and transmission and distribution infrastructure that may be impacted by climate change, earthquakes, wildfires, and other hazards.

Moving Upstream to Zero Waste

DISCUSSION

The City of Seattle has built a reputation as an international leader in solid waste management. Among many achievements, Seattle has reduced City waste generation and disposal to landfills, and increased recycling and composting despite tremendous population growth. Seattle has also pursued opportunities in the Construction & Demolition (C&D) waste realm to ban recyclable materials from disposal and require that salvage be considered prior to demolition. To further advance a zero-waste goal, Seattle is focused on eliminating or minimizing waste from the start, not just maximizing the recycling rate. The City is working to identify opportunities for preventing waste as early or as far upstream in that life cycle as possible to reduce environmental and health impacts. Zero waste means producing and using less, not just recycling more. All resources have value, and we strive to waste nothing.

GOAL

U G5 Seattle's solid waste system generates zero waste by creating a circular economy and by reducing waste and climate pollution.

POLICIES

U 5.1 Identify and promote opportunities, including contracting and grant funding, for circular material processing models at the local level that keep products and materials in use.

U 5.2 Implement and enforce policies and programs to reduce the amount of food waste generated to align with statewide goals.

U 5.3 Advance waste prevention through research and data, outreach, food waste prevention, reusable alternatives to single use items, community-led programs, green purchasing policies, expanded opportunities for reused material and repair services, and textile waste prevention.

U 5.4 Improve the quality of recycled material through advocacy, reduced contamination, product stewardship programs, and industry-led take-back recycling programs.

U 5.5 Increase and/or improve the quality of composting through standards for compostable food packaging, market development of compost products, and assessment of options for diaper and pet waste recovery.

U 5.6 Expand education campaigns to increase awareness of the City's solid waste and waste prevention programs and services, including targeted outreach to underserved communities.

U 5.7 Prevent and divert construction and demolition debris through industry outreach, improved compliance enforcement, and incentives.

U 5.8 Expand reuse and recycling opportunities at City transfer stations and private solid waste facilities.

U 5.9 Continue to monitor markets for traditional recyclable materials (glass, plastic, etc.) and construction and demolition materials, take measures to ensure responsible recycling of collected materials, and identify opportunities to support emerging markets such as City purchases of recycled content products.

Clean Energy

DISCUSSION

Seattle's energy future is based on carbon-free renewable resources. The Washington Clean Energy Transformation Act adopted in 2019 requires Washington utilities to transition to a carbon-free electricity supply by 2045 and to ensure all customers benefit from the transition to clean energy. In

2020, 97% of Seattle's electricity came from non-emitting resources (3% unspecified), with 86% from hydropower. Seattle City Light, the city's municipal electric utility, has been net carbon neutral since 2005, purchasing off-sets for any GHG emitting resources. In order to meet our growing load due to building and transportation electrification in the future, Seattle City Light's 2022 Integrated Resource Plan calls for the utility to acquire additional resources between 2022 and 2031, including utility scale wind & solar, customer-side solar, energy efficiency, and demand response.

Seattle's long-range energy demand is changing. Energy efficiency technologies continue to drive down per capita use. But more energy will be needed to decarbonize and electrify transportation, buildings, and industry. More frequent periods of extreme temperatures due to climate change will alter peak demand. Electric vehicle adoption relies on sufficient clean energy and a dense network of fast charging stations. Distributed energy resources such as solar photovoltaics and energy storage, as well as energy efficiency, and demand response will help manage rising demand.

Moving away from fossil fuels toward a clean energy future requires significant commitments and partnerships, new infrastructure, and a modernized grid to make the delivery of electricity resilient, secure, flexible, carbon-free, and affordable. The transition to clean energy must be an equitable one. People who have been unable to access clean energy services or job opportunities associated with clean energy due to economic or social barriers must benefit from this energy transition.

GOAL

U G6 Future energy needs are met with safe, affordable, reliable, and environmentally responsible power.

POLICIES

U 6.1 Grow demand for clean energy through electrification of all utilities sectors in a responsible manner.

U 6.2 Invest in access to low-cost carbon-free renewable power by enhancing and updating the electricity grid to support customers as more buildings and transportation modes become electric and as climate change impacts grid capacity.

U 6.3 Prepare for the increased integration of distributed energy resources and more customer options.

U 6.4 Deploy new strategies to encourage customers to use energy efficiently. Use targeted outreach to low-income households to ensure they benefit from new strategies.

U 6.5 Deploy new technology and infrastructure to better manage increased electrical loads from building and transportation decarbonization.

U 6.6 Improve demand side management and energy efficiency options to serve customers while meeting our sustainability goals.

U 6.7 Implement an integrated distribution, transmission, and generation resource planning framework.

U 6.8 Participate in emerging regional and multi-state organizations to develop coordinated planning and a western energy market.

U 6.9 Require new district energy utilities to generate carbon neutral energy consistent with City and State carbon reduction goals.

Internet for All

DISCUSSION

The internet has changed how people get jobs, learn, receive health information, and participate in society. Access to affordable, reliable high-speed internet is now as essential as clean water and electricity. For decades Seattle has been at the forefront of advancing digital equity, yet digital inequities persist in key demographic groups lacking high-speed internet and devices needed for school and work. The City is committed to working with public entities and telecommunications providers to achieve equitable internet access for all residents of Seattle.

GOAL

U G7 All Seattle residents have access to high-speed internet service that is reliable and affordable.

POLICIES

U 7.1 Increase awareness and adoption of low-cost internet programs and devices.

U 7.2 Advocate for and partner with telecommunications carriers to expand free or low-cost internet in targeted areas of the city, including free Wi-Fi in community centers, libraries, and other City-owned facilities.

U 7.3 Partner with organizations to deliver culturally relevant digital equity programs.

U 7.4 Coordinate with other public entities and telecommunications providers to improve and expand telecommunications infrastructure throughout the city.

U 7.5 Advocate to ensure Internet Service Provider offerings meet residents' current and future needs.

U 7.6 Examine new technologies to ensure best-in-class internet infrastructure and consumer choices.

Economic Development

Introduction

The City anticipates adding 159,000 net new jobs over the next 20 years. The Growth Strategy identifies the geographic areas best suited for job growth. Some businesses and jobs are best suited to mixed-use, walkable neighborhoods and business districts within our Regional Centers, Urban Center, and Neighborhood Centers. Others require unique features, services, and targeted land uses that fit best in our Manufacturing and Industrial Centers (MICs). Guided by the policies in this Plan, Seattle will manage our local economy to sustain existing businesses while anticipating the needs of emerging businesses and industries.

Seattle is an attractive place to live, giving it a competitive economic advantage. Seattle's beautiful physical setting, thriving cultural scene, walkable neighborhoods, diverse restaurants, unique shopping, access to nature, and historic locations generate direct economic benefits to residents. These attributes also contribute to the high-quality of life that draws businesses, people, and tourists to the city. Seattle also benefits from the way leaders from public and private sectors work together to encourage innovation and to support business formation, retention, and expansion.

Throughout its history, however, economic expansion has not benefited Seattle's residents equitably. Marginalized communities have not had the same access to opportunities in growing industries that many Seattleites have benefited from.

The purpose of the Economic Development element of this Plan is to provide direction about how to maintain and grow Seattle's vibrant, diverse, and increasingly global economy to benefit individuals equitably across income levels, as well as business, industry, and the city's racially and culturally diverse communities. As Seattle grows, the City will strive to reduce income inequities and to identify and address policies that contribute to or create inequity.

Neighborhood Business Districts

DISCUSSION

Seattle enjoys an attractive, flourishing Downtown core that contains about 40 percent of all jobs within the city. Outside of Downtown, and throughout Seattle, are many long-standing, distinctive, walkable central places within neighborhoods. This is where many small businesses thrive, communities come together, and many local jobs are created. About 12 percent of Seattle's jobs are located in these areas. Neighborhood business districts are often a central anchor for BIPOC and immigrant communities providing opportunities for goods and services, cultural activities, and community gathering spaces.

GOAL

ED G1 Seattle consists of vibrant and diverse business districts and commercial areas that serve local communities in neighborhoods across the city.

POLICIES

ED 1.1 Invest in and promote stability, growth, and accessibility in the downtown core, as the economic and cultural center of the city and the region.

ED 1.2 Make investments for a safe, walkable, and accessible downtown core to attract businesses, residents, workers, and visitors.

ED 1.3 Build on downtown's cultural, historic, nightlife, and other assets to enhance living, working, shopping, recreation, tourism, and entertainment.

ED 1.4 Develop proactive and collaborative approaches toward achieving mutual compatibility of activities, including nightlife and entertainment and both businesses and residents.

ED 1.5 Invest in and promote neighborhood business districts as the economic and cultural centers of their communities and as unique places within the city and region.

ED 1.6 Strengthen local organizations that support businesses, conduct marketing and events, maintain a clean, safe, accessible, and attractive environment, and advocate for community needs.

ED 1.7 Support business districts serving historically underserved communities, including Native American communities, that have benefited from fewer economic opportunities.

ED 1.8 Enrich the vibrancy of neighborhood business districts through the integration of design, public art, public space, historic preservation, small locally owned businesses, and cultural spaces and programming.

ED 1.9 Support the vibrancy of locally owned small businesses and their ability to remain in neighborhood and commercial districts where they exemplify and promote their community's identity, cultural richness, and character.

ED 1.10 Promote the development of affordable commercial spaces that meet the economic and cultural needs of BIPOC and other historically underserved communities, with a focus on serving the needs of businesses that are at risk of displacement.

ED 1.11 Support formation of Business Improvement Areas (BIA) and other business partnerships and alliances, to help provide clean and safe services, marketing and promotion, business and economic development planning, community appearance and pedestrian environment, urban design, advocacy, and organizational development/administration in commercial districts and key industries.

Growing Business and Industry

DISCUSSION

Seattle's best prospects for future economic growth are in its key "industry clusters"—concentrated networks of interdependent firms in a defined geographic area that share common markets, technologies, and a need for skilled workers. Examples of Seattle's industry clusters include manufacturing, maritime, construction, biotech and life sciences, the creative economy, global health and health care, clean technology, information technology, tourism, and film and music.

These clusters help the associated businesses, which benefit from the rapid exchange of information, leading to innovative and efficient operations. The clusters are also an asset to the overall economy. Generally, businesses in industry clusters pay higher than average wages, bring new capital into the economy, are environmentally minded, and add variety to the economic base. By identifying key sectors of the economy in which Seattle has a competitive advantage, the City is better able to nurture industry clusters that contribute to a vibrant, balanced, diversified, and equitable economy that benefits individuals across all income levels. At the same time, we must work to reverse historically inequitable results from changing economic structures of the city that lead to uneven access to employment opportunities, increases in housing costs, and displacement of marginalized communities.

GOAL

ED G2 Seattle's innovative industry clusters in growing and essential high–wage industries continue to grow and develop, enhancing our competitive advantage as a city and region.

POLICIES

ED 2.1 Seek investments in workforce development and infrastructure to support maritime and manufacturing clusters.

ED 2.2 Support regional partnerships targeting maritime and manufacturing, to sustain and grow middle- and high-income jobs locally and support the regional and state economy.

ED 2.3 Promote, support, and improve linkages between industry clusters and research institutions, hospitals, educational institutions, and other technology-based businesses.

ED 2.4 Catalyze collaboration among businesses within and across industry clusters in the areas of marketing, research, capital and talent acquisition, job training, and career pathway development.

ED 2.5 Improve the ability of industry clusters to transfer technology.

ED 2.6 Work with strategic industry clusters to diversify key occupations, ensuring that the employed workforce is representative of Seattle's racial and socioeconomic groups.

ED 2.7 Promote and lead coordination of economic development and community development among City departments, as well as with all levels of government, the business community, and nonprofits, to strengthen industry clusters.

ED 2.8 Identify and support innovative, small locally owned businesses that have the potential to form new industry clusters.

ED 2.9 Promote employer retention through robust engagement with existing businesses to understand their needs and help them thrive in Seattle.

Business and Industry Retention and Growth

DISCUSSION

A city's business climate is determined by how well it attracts and sustains businesses. The external factors that shape this climate include quality of the workforce, taxes, regulations, incentives, and other government policies and investments, as well as overall quality of life in the city. Seattle is renowned for its mild climate, extraordinary access to recreation and natural resources, and diverse cultural offerings. Seattle's collaborative culture is another economic advantage. However, some aspects of Seattle's business climate pose challenges for business, such as complex development

regulations, earthquake risk, challenges in funding transportation and education systems, and past under-investment in many of the city's cultural communities and neighborhoods.

GOAL

ED G3 Seattle's business climate encourages new investment and business retention to achieve high quality job creation, economic resilience, and opportunities to ensure cultural identity, diversity, and inclusion.

POLICIES

ED 3.1 Promote the expansion of interstate commerce and international trade within Seattle and throughout the region.

ED 3.2 Support a stable and more competitive business climate through policies and planning that are implemented with transparent, predictable, and efficient regulations and approval processes.

ED 3.3 Foster partnerships with the state, counties, other cities, schools, community colleges, port districts, businesses, and organizations engaged in diversifying and expanding the economic base for people who live, work, and own businesses in Seattle.

ED 3.4 Improve coordination of information and services between City, county, regional, state, and federal agencies to develop and implement economic-development policies and programs.

ED 3.5 Prepare for post-disaster economic recovery by planning for long-term systemic needs and short-term mitigation strategies.

ED 3.6 Monitor and advocate for fiscal and other policies through data driven analysis that consider benefits and costs to business growth and retention, particularly those driving wealth creation within marginalized communities.

ED 3.7 Plan for and invest in transportation for movement of freight and people, infrastructure, and utilities to support strategic industries.

ED 3.8 Use Seattle's competitive advantages to attract and expand business, a highly skilled workforce, and good paying jobs to advance community and environmental sustainability.

ED 3.9 Implement zoning and other tools to encourage business growth and development that uses and promotes sustainable technologies.

ED 3.10 Identify opportunities to leverage Major public facilities and capital investments to drive for economic development and business retention.

ED 3.11 Assist businesses in identifying locations that suit their needs by tracking appropriate and available sites for business attraction or expansion.

Investing in Talent and Developing our Workforce

DISCUSSION

The success of industry clusters depends on a skilled and competitive workforce. However, employers often face challenges finding qualified job applicants for some positions in Seattle. This includes a variety of industries that have been unable to find enough local college graduates to fill jobs in certain engineering, computer, and life science fields, as well as traditional industries looking to replace an aging highly skilled workforce. As a result, many employers look to attract talent from elsewhere. Better education and training of local workers can connect displaced workers, disadvantaged youth, and recent immigrants to highly skilled job opportunities. Workforce development is one of the ways that the City can provide equitable access to career opportunities to BIPOC and immigrant communities.

GOAL

ED G4 Seattle has a highly trained and well-educated local workforce that effectively secures stable, meaningful, and productive employment, earns a living-wage, meets the needs of business, and increases opportunities for social mobility.

POLICIES

ED 4.1 Promote racial and social inclusion in the workforce by creating and growing workforce development programs specifically focused on diversifying talent pipelines for living wage jobs.

ED 4.2 Support and encourage businesses to pay a living wage, provide necessary employee benefits, and train and hire local residents so that the existing and future workforce can share in the city's prosperity.

ED 4.3 Explore opportunities to coordinate community development activities with workforce development in communities with high unemployment or barriers to employment.

ED 4.4 Expand internships, apprenticeships, and other "earn and learn" models for early career workers in high demand occupations supporting key industries.

ED 4.5 Create and grow re–training programs to help dislocated workers, including older workers, transition to new high-quality jobs in high–demand occupations.

ED 4.6 In collaboration with community-based organizations, expand programs designed to fully engage marginalized communities in the labor force, putting members of those communities on a path to economic self-sufficiency.

ED 4.7 Reduce barriers to education, training, and employment by developing program linkages, including digital access, to worker and student financial assistance, wrap-around supports, and childcare.

ED 4.8 Expand investments in youth of color and their parents and guardians to raise awareness and provide additional access to regional education and training pathways that lead to high demand careers and good quality jobs.

ED 4.9 Expand investments to promote stable employment and retain people working in arts, culture, technology, and other parts of the creative economy.

ED 4.10 Promote the development and expansion of high demand career pathways in occupations that result in good quality jobs in Science, Technology, Engineering, Arts, and Mathematics (STEAM) fields and related key industries.

Women, Minority-owned, and Small Business Supports and Entrepreneurship

DISCUSSION

Achieving a thriving and equitable community means we need to support entrepreneurial activity, particularly for women and minority-owned small businesses. As technological advances continue to lower the cost of starting some types of new businesses, the number of new entrepreneurs may rise. In addition to attracting new types of businesses, we must redouble our efforts to retain the small, culturally diverse businesses that support equally diverse communities.

Our city is home to major national companies such as Trident Seafoods, Filson, Cascade Designs, Starbucks, Amazon, and Nordstrom, to name a few. However, most Seattle businesses are much smaller and have fewer than 10 employees. Sectors with an especially high proportion of small businesses include construction, wholesale trade, manufacturing, retail and related services, and, increasingly, start-ups in technology and other creative industries. In addition, small food growers, processors, and distributors are a quickly expanding presence within the local economy.

GOAL

ED G5 Seattle's economy promotes and supports entrepreneurship and the growth and long-term viability of women and minority-owned small businesses.

POLICIES

ED 5.1 Strengthen small business start-ups by connecting women- and minority-based enterprises (WMBE) and other small businesses to capital.

ED 5.2 Support the expansion of higher education programs that promote commercialization of research innovations and incubate and accelerate the growth of new start-ups.

ED 5.3 Support and grow arts and culture activities to attract creative economy workers, living wage employers, and tourists to Seattle, as well as to enrich our overall culture of innovation.

ED 5.4 Develop strategies to lower the cost of business infrastructure for small businesses, including building relationships, finding resources, and providing shared infrastructure.

ED 5.5 Establish incentives for building owners to offer affordable spaces for start-ups and small businesses and partner with community–based organizations to own and operate their own affordable commercial real estate.

ED 5.6 Reduce barriers to business start-up and entrepreneurship, especially barriers that confront BIPOC, immigrant, and refugee communities, including by providing access to and support.

ED 5.7 Review City regulations and processes to identify and address barriers for small and WMBE businesses.

Asset Ownership

DISCUSSION

Asset ownership is an effective strategy to provide economic opportunity, create generational wealth, expand access to markets, and provide jobs. This strategy is particularly important for women and minority owned businesses and it promotes economic stability through a flourishing small business sector.

GOAL

ED G.6 Seattle's economy fosters growth in business and asset ownership among small businesses and expand access to markets, particularly women, minority-owned and BIPOC businesses.

POLICIES

ED 6.1 Support owner–occupied commercial real estate financing strategies, with a focus on women, minority-owned and BIPOC business owners, enabling businesses that are leasing commercial spaces to get the capital needed to buy them.

ED 6.2 Support community-based programs to enable women, minority, BIPOC and low-income residents to acquire residential and commercial real estate through mechanisms such as community land trusts or community investment trusts.

ED 6.3 Support individual financial empowerment programs, including financial literacy training, bank access, and access to savings products like college savings accounts.

Build and Invest in the Green Economy

DISCUSSION

Building a green economy provides opportunities for new industries, wealth building careers, and complements current industrial clusters seeking to advance climate friendly modernization.

GOAL

ED G7 Seattle's economy includes vital green industry sectors to provide employment opportunities while promoting an environmentally sustainable future.

POLICIES

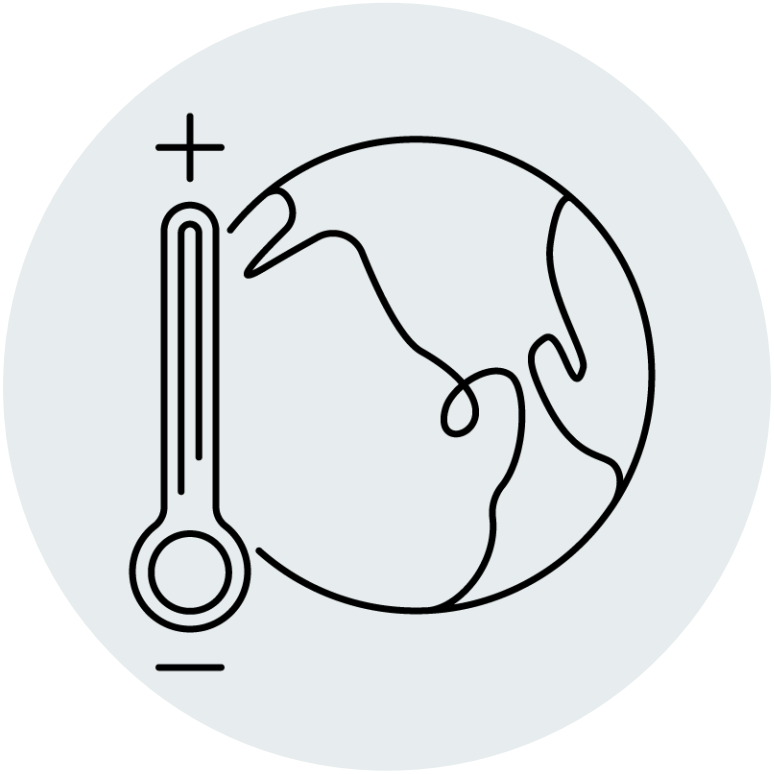
ED 7.1 Establish partnerships to build workforce capacity to advance continuation of city-wide decarbonization and climate adaptation efforts, as consistent with state law, including through electrification, construction, conservation, and other new green technology programs.

ED 7.2 Promote and support access within BIPOC communities to wealth building, careers, asset ownership, and youth opportunity in strategic industries which are transitioning to a green economy.

ED 7.3 Support business partnerships and models which are centered on climate mitigation, climate adaptation, and/or a shift toward sustainable operational models within established industries, including incubator and accelerator funding of new sustainable businesses.

ED 7.4 Invest in resources and staff to increase and sustain STEAM education in K-12 systems with a focus on closing gender and race gaps in STEAM career fields.

ED 7.5 Use Seattle's sustainability policies and investments as a business recruitment tool.



Climate and Environment

Introduction

Seattle is a place of unparalleled natural beauty. Indigenous peoples, stewards of these lands and waters from time immemorial, continue to remind us of our connections to nature to sustain and inspire us. Newcomers are drawn by access to nature both within the city as well as to the mountains, rivers, and beaches beyond. Our natural environment, including trees, forests, and water resources, are central to Seattle's quality of life and identity, and essential to the survival of imperiled native species, such as salmon and orca. Strong values of environmental protection and sustainability have shaped our Comprehensive Plan from the start.

But Seattle is facing a growing and evolving challenge: climate change. The burning of fossil fuels and land use changes have increased the concentration of carbon in the atmosphere and in our oceans. As seawater absorbs carbon from the atmosphere it becomes more acidic, making it difficult for oysters, clams, corals and other organisms to build and maintain their calcium carbonate structures. Warmer average temperatures, more frequent extreme heat events, prolonged wildfire smoke episodes, extreme precipitation, and sea level rise are projected to worsen under a variety of

future climate scenarios. The severity of climate scenarios depends on the ability to reduce greenhouse gas emissions and improve adaptation for the City's systems and communities.

The natural environment plays an important role in the battle against climate change by helping the city adapt to impacts and mitigate climate pollution. Trees and vegetation buffer the impacts of extreme heat and poor air quality. Wetlands and floodplains absorb excess rain and reduce flooding. Trees, shrubs, and soil absorb and store carbon, preventing its release into the atmosphere. Climate change also affects the health and sustainability of these resources. Preservation and restoration are necessary for a healthier and more resilient city. The City of Seattle is redoubling efforts to reduce carbon emissions that contribute to global climate change. Just as important, the City is working on multiple fronts to strengthen the resilience of our communities and natural environment to current and future climate impacts and other hazards that climate change can exacerbate such as earthquakes, landslides, tsunami, biological hazards, fires and power outages. Seattle is leading this work with climate justice to ensure those most harmed by past racial, economic, and environmental injustice are not further harmed by the impacts of climate change or the transition away from fossil fuels. As the City takes action to adapt and decarbonize, environmental benefits must be equitably distributed, and burdens must be minimized and equitably shared.

In 2023 the Washington State legislature passed House Bill 1181 updating the State's planning framework to improve the state's response to climate change. This bill requires Seattle to adopt a new climate change and resiliency element including sub-elements addressing greenhouse gas emissions reduction and resiliency. This Climate and Environment element is organized to include two required sub-elements (see below). Because of the broad reaching impacts of climate change, additional policies addressing climate change are included in every element of this Plan.

- **Carbon Pollution Reduction** includes goals and policies that reduce carbon pollution.
- **Healthy Resilient Communities and Environment** includes goals and policies that foster climate resiliency to the impacts of climate change and natural hazards and sustain healthy tree canopy, water resources, and local food system.

Climate and Environment Sub-element:

Carbon Pollution Reduction

Global and local climate change is a direct result of an excessive amount of carbon pollution trapping too much heat in our atmosphere. It is imperative that the sources of carbon pollution be reduced and ultimately eliminated. Seattle has been a world leader in reducing carbon pollution. Seattle was the first city in the nation to adopt a green building goal for all new municipal facilities. Seattle City Light was the nation's first large electric utility to become carbon neutral. Mayor Nickels launched the Mayor's Climate Protection Initiative and challenged U.S. mayors to reduce carbon pollution 7% below 1990 levels by 2012. Seattle was one of the first cities in the nation to adopt a Climate Action Plan (CAP) in 2006 to achieve that goal.

Though much progress has been made, it has not been enough. Carbon pollution levels continue to warm our planet, and the impacts of climate change are ever more apparent. Ultimately, Seattle aims to reach zero carbon—no greenhouse gas (GHG) emissions.

Setting Goals and Measuring Progress

DISCUSSION

Carbon pollution, also called greenhouse gas or GHG, is a gas in the atmosphere that traps and holds heat. When we use the phrase carbon pollution, we are talking about the gases released into the atmosphere primarily as a result of human activities. The more carbon pollution we release, the more our climate is impacted.

Every two years, Seattle releases a geographic-based GHG inventory that tracks emissions that occur within the city's borders in three key core sectors: transportation, buildings, and waste. The *2022 Community GHG Emissions Inventory* finds that from 2020 to 2022, Seattle's core GHG emissions rose 4% while the City's economy grew 22%.

- Transportation (58% of core emissions): 4% increase in GHG emissions. While vehicle efficiency improved, the primary driver for the emissions, vehicle miles traveled, increased nearly 9%. Likely contributors include increased business and employee activity, travel, and tourism. Transit ridership has also been gradually increasing since the low-point of the pandemic.
- Buildings (40% of core emissions): 6% increase in GHG emissions. Emissions from residential and commercial gas and electricity both rose by a few percentage points, with nearly all emissions in buildings coming from burning fossil gas. Extreme weather and pandemic-induced consumption changes likely had an important role. There were 15% more cooling degree days and 13% more heating degree days in 2022 versus 2020.
- Waste (2% of core emissions): 7% increase in GHG emissions. 2022 saw a significant increase in emissions associated with waste brought by customers directly to the city's transfer stations (approximately 40%). This was caused by increased disposal of materials that should have been recycled or composted and by more waste coming from outside Seattle to the city's transfer stations.

Seattle and King County have also collaborated on an inventory of consumption-based GHG emissions sources to measure the GHG emissions associated with the food we eat, the things we buy, how we travel, and the homes we live in. This analysis, based on 2019 data, shows that Seattle's consumption-based emissions are estimated to be two to four times larger than our typical geographic-based emissions. Seattle is committed to measuring and managing the complete scope and scale of our climate pollution and identifying where the opportunities are for our greatest impact.

To further reduce emissions, the City is focused on decarbonizing buildings and shifting to zero emission vehicles, travel modes, and trips. The City is fortunate to have Seattle City Light's majority clean, affordable, and reliable electricity to power our transportation and buildings. They are

planning for the future by identifying additional clean power sources to meet increased demand and readying the power grid to be more flexible, reliable, and resilient enough to withstand an increased load demand from the electrification of buildings and transportation, and changing heating and cooling needs. The City is also addressing consumption-based emissions by supporting policies and practices that prevent waste such as food waste prevention and food rescue, building deconstruction and building materials salvage, and the promotion of reuse and repair. The City also supports a range of policies and practices that prevent emission-producing waste.

GOAL

CE G1 Seattle's core GHG emissions are reduced by 58 % from 2008 levels by 2030 and attain carbon neutrality by 2050.

POLICIES

CE 1.1 Work collaboratively across City departments to periodically inventory, evaluate, and update geographic-based GHG emissions reduction targets to reflect the latest international climate science targets and analysis methods and to align with state and regional goals.

CE 1.2 Incorporate additional and better data into the inventory, evaluation, and targets for expanded emissions and community consumption emissions.

CE 1.3 Develop and implement policies, programs, and projects to equitably reduce GHG emissions to meet our adopted targets in partnership with the Green New Deal Oversight Board and the Environmental Justice Committee.

CE 1.4 Partner with regional agencies, local jurisdictions, frontline communities, the state, academic institutions, community leaders, industry, Tribes, and public, private, and not-for-profit groups to promote programs and policies that achieve GHG emission reduction targets and increase the awareness and transparency of GHG emissions inventories.

Transportation

See also Transportation Element

DISCUSSION

Transportation accounts for the majority of Seattle's core GHG emissions, The City is focused on cutting transportation emissions by reducing personal vehicle use by making walking, biking, and transit options more attractive. Another key strategy is to support and accelerate transportation electrification by ensuring the electricity system (supply and distribution) can meet increased demand, providing more public electric vehicle charging facilities, and supporting all-electric buses across our region. But Seattle is not yet on track to meet our 2030 emissions reduction goals. More aggressive change is needed across the transportation sector to transition from fossil fuels to zero-emissions energy sources.

GOAL

CE G2 GHG emissions are reduced by reducing vehicle trips and transitioning to zero-emissions trips.

POLICIES

CE 2.1 Make short trips safe, affordable, and zero emissions by expanding facilities for walking and biking and support the use of shared bikes and scooters.

CE 2.2 Create opportunities for zero emission trips that are affordable for lower-income households.

CE 2.3 Focus and tailor efforts within neighborhoods to reduce vehicle traffic and encourage walking and biking, such as by designating low-pollution neighborhoods.

CE 2.4 Establish neighborhood delivery hubs to reduce trips from delivery vehicles and to facilitate more zero emission delivery trips via electric vehicles and bikes.

CE 2.5 Expand first- and last-mile public transportation options for people to access regional and frequent transit services.

CE 2.6 Explore policies to price the use of vehicles, including expanded parking pricing, user fees, tolls, and low-pollution neighborhoods and including provisions to achieve equitable distribution of burdens.

CE 2.7 Develop regulations and incentives to shift personal trips to zero-emission travel modes (transit, biking, and walking) to achieve 90% zero emission trips by 2030.

GOAL

CE G3 GHG emissions are reduced by expanding and expediting the transition to electric vehicles.

POLICIES

CE 3.1 Partner with transportation service providers and private companies to electrify public transit, taxis, transportation network and carshare vehicles to achieve a goal that 100% of shared mobility is zero emissions by 2030.

CE 3.2 Ensure that infrastructure required for transportation electrification is installed and operational in a proactive and timely manner.

CE 3.3 Streamline permitting and installation for electric vehicle charging and grid modernization infrastructure to support the adoption of electric vehicles.

CE 3.4 Work with utility providers, developers, electric vehicle companies, and other partners to expand electric vehicle charging infrastructure across the city including at City buildings, multifamily homes, apartment buildings, major employer buildings, and parking garages.

CE 3.5 Support the electrification of freight vehicles through strong partnerships with the State of Washington and the NW Seaport Alliance to reduce GHG emissions, improve air quality and health outcomes in communities with high freight traffic, and to support the goal of 30% of goods delivery being zero-emission by 2030.

CE 3.6 Develop and regularly update a plan outlining policies, regulations, capital facilities and programs needed to support and expand electric vehicle charging infrastructure.

CE 3.7 Support state-level policies and actions that incentivize and create requirements for clean fuels and electrification of private and commercial fleet vehicles.

CE 3.8 Encourage residents and workers to choose electric vehicles through education, promotions, incentives and other strategies.

Development Pattern

See also Growth Strategy and Land Use Elements

DISCUSSION

Living in an urban area like Seattle can substantially reduce a person's GHG emissions by allowing them to travel shorter distances to shops, services, and amenities and to use transit, walking, and biking to accomplish more trips. Urban residents tend to live and work in compact buildings that use less energy. Growth in urban areas also reduces development on the urban fringe, which contributes to sprawl, vehicle miles traveled, and the conversion of farms and forests. Consequently, accommodating more jobs and housing in Seattle is one of the best things we can do to support our climate goals. Additionally, as we grow, we have an opportunity to focus our growth in ways that let more people access jobs, shops, services, and amenities by transit, walking, and biking.

GOAL

CE G4 The location of new jobs and housing reduces carbon pollution and discourages fossil fuel use.

POLICIES

CE 4.1 Plan for the location of jobs and housing within Seattle to reduce regional emissions due to transportation, sprawl, and greenfield development.

CE 4.2 Promote the development of complete, connected communities where people can walk, bike, and roll to everyday needs.

CE 4.3 Focus new housing and jobs in areas near transit and activity centers, where people can walk, bike, and roll to shops, services, and amenities.

CE 4.4 Consider limits on new or expanded bulk fossil fuel facilities in order to ensure public health and safety, promote resiliency, and support achievement of the City's climate goals.

Buildings and Energy

See also Land Use, Capital Facilities, and Utilities Elements

DISCUSSION

In Seattle, buildings are one of the largest and fastest growing sources of climate pollution, responsible for more than a third of our city's GHG emissions. More than 90% of these emissions result from burning fossil fuels for heat, hot water, and appliances. For our health and resilience in the face of a changing climate, Seattle is committed to a goal of eliminating climate pollution and transitioning to 100% clean energy in all buildings by 2050.

GOAL

CE G5 Buildings are zero emission and use 100% clean energy.

POLICIES

CE 5.1 Use building, energy, and zoning codes to require or encourage meeting established energy targets, reducing embodied carbon of materials, increasing mass timber and other engineered wood products, reducing fossil fuel use, improving climate adaptation, and supporting a transition to electric vehicles and clean energy.

CE 5.2 Incentivize green building certification for new development from third party organizations that align with the City's climate goals.

CE 5.3 Implement building performance standards with other major building improvements that improve resiliency such as seismic retrofits.

CE 5.4 Plan for all municipal buildings to maximize energy efficiency and operate without fossil fuel systems and appliances no later than 2035.

CE 5.5 Educate and assist building owners to access resources, including federal and state incentives and rebates for switching from fossil fuels to electric appliances.

CE 5.6 Lessen the impacts of transitioning to clean energy on low-income renters and homeowners, such as by providing more time for affordable housing to meet building performance standards.

CE 5.7 Provide information, technical assistance, and financial support to low-income homeowners and landlords of affordable housing to implement weatherization, electric heat pump conversion, and other electrification and energy efficiency home retrofits.

CE 5.8 Encourage the use of clean energy sources, such as renewables or waste heat, in both existing and new buildings.

CE 5.9 Consider new regulations and incentives for existing buildings to improve energy efficiency and transition to clean energy sources.

CE 5.10 Support and expand building energy efficiency retrofit programs that maximize the utilization of local, state and federal funds to reduce building energy use and improve energy resilience, especially in affordable housing.

CE 5.11 Decarbonize the maritime industry and increase the resiliency and reliability of the Seattle waterfront microgrids.

Solid Waste

See also Utilities Element

DISCUSSION

As waste sent to landfills decays, it produces GHG emissions. The *2020 Community GHG Emissions Inventory*, a geographic-based inventory, calculated that the waste sector accounts for 2% of Seattle's core GHG emissions. In 2023 the City completed its first *Seattle Communitywide Consumption-based GHG Emissions Inventory* which estimated the production and consumption of goods and food accounts for 38 percent of Seattle's consumption-based emissions. The inventory confirmed that waste prevention remains an important climate change mitigation strategy. Seattle uses incentives, policies, and recycling and composting programs to prevent waste and divert waste from landfills. In 2021, recycling rates reached 53%.

Moving forward, there will be more emphasis on waste prevention, which targets product consumption and consumer behavior to address the root cause of waste and toxins to reduce their impact. This requires a shift from a traditional extractive economy (take, make, dispose) to a circular economy that keeps resources in use for as long as possible by designing out waste and regenerating natural systems. In a circular economy, end waste products become inputs for new production.

GOAL

CE G6 Seattle's solid waste system has zero carbon pollution by 2050 and supports a circular economy.

POLICIES

CE 6.1 Reduce the amount of waste generated by the residents, businesses, and other public and private organizations in the city

CE 6.2 Increase the amount of recoverable waste that is diverted from garbage to recycling and composting.

CE 6.3 Encourage the use of durable, local products and recycled-content or reused materials, reused building materials, low carbon materials, along with recycling at the end of products' lives.

CE 6.4 Support a food system that encourages consumption of local foods and healthy foods with a low carbon footprint, reduces food waste, and fosters composting.

CE 6.5 Implement community outreach and education programs around proper waste reduction, recycling, and composting with a focus on food waste.

CE 6.6 Update solid waste contracts to further reduce carbon pollution.

CE 6.7 Encourage the building industry and consumers to choose reused and low-carbon building materials to prevent and divert construction and demolition debris.

Climate and Environment Sub-element:

Healthy, Resilient Communities and Environment

All residents deserve access to clean air, fresh water, and a healthy community and environment. Building healthy resilient communities encompasses many things, including keeping neighbors safe and connected during climate events, managing and preserving tree canopy and urban forests to reduce climate impacts, and accessing healthy, locally grown, and culturally relevant foods.

In 2023, the Seattle Climate Vulnerability Assessment documented the potential impacts of climate change on the city. This study found that climate change impacts and hazards will have multiple transformative impacts on Seattle, including affecting the local economy, exacerbating public health disparities, stressing infrastructure systems, affecting community well-being and resiliency, and transforming local ecosystems and habitats. The burden of these impacts will be unevenly experienced across Seattle. Areas with fewer community services—such as grocery stores, parks, libraries, and transit—often coincide with neighborhoods that were historically redlined and have a higher population of residents of color, non-English speaking residents, and older adults. These areas, also called frontline communities, will also be more vulnerable to climate-related extreme events.

Aging infrastructure systems will be more vulnerable to climate-related hazards and extreme events. Many systems are connected so impacts to one system will often have cascading impacts to other systems, services, and assets. While Seattle's systems and assets are relatively resilient to the impacts of climate change, consequences and damages are still highly likely during and after extreme events.

Extreme events—such as the 2021 heat dome event or the 2022 King Tide flood event—are likely to continue to occur, leading to cascading and compounding impacts for residents, businesses, and systems. For example, the 2021 heat dome event led to peaks in heat-related emergency calls and injuries, impacts to highways and public transit systems, and temporary business closures. These

extreme events may have long-term mental and community health impacts, such as anxiety or post-traumatic stress disorder.

Planning for Resilience

DISCUSSION

Even with aggressive reduction of carbon pollution, climate change is inevitable, and Seattle is already experiencing impacts. While the City has already made strides to improve resiliency, the vulnerability to climate change must be considered in all City plans and strategies. The City must adapt to climate change in ways that increase resilience to other natural hazards, notably earthquakes. Resilient people and communities are better-prepared and able to withstand the catastrophic shocks of a sudden disaster as well as the slower-moving stressors of climate change.

Improved resilience can avoid additional impacts on Tribal communities, ancestral lands and resources. The City can also benefit from peer networks focused on climate change, such as C40 Cities, King County Cities Climate Collaboration (K4C), SeaAdapt, Puget Sound Climate Preparedness Collaborative to solve problems across municipal boundaries, share resources, and learn about best practices and innovative strategies.

GOAL

CE G7 Seattle is well prepared for the direct and indirect impacts of climate change and other natural hazards.

POLICIES

CE 7.1 Regularly update citywide all hazard and climate vulnerability assessments that address physical, social, and economic vulnerabilities and consider cascading or compounding effects across multiple systems.

CE 7.2 Develop and implement emergency response, recovery, and mitigation plans for specific hazards that integrate race and social equity along with overall climate planning.

CE 7.3 As new climate change impact data become available, review and, as needed, update development regulations to encourage adaptation and reduce vulnerability to extreme weather and natural hazards exacerbated by climate change including flooding, coastal erosion, landslide, liquefaction, sea-level rise, extreme heat, drought, and wildfire smoke.

CE 7.4 Consider climate impacts and embed climate adaptation into City plans such as land use plans, strategic business plans, system plans, infrastructure plans, capital facility plans, and asset management processes.

CE 7.5 Update Seattle's hazard mitigation plan and emergency management plans to reflect hazards caused by climate impacts like sea-level rise and associated flooding.

CE 7.6 Improve climate resilience and advance climate adaptation through coordination, collaboration and partnerships among City departments, other public agencies, knowledge sharing networks, funders, Tribes, and affected communities, especially the impact of sea-level rise for multijurisdictional shorelines

CE 7.7 Establish performance metrics and periodic reporting to track progress on climate resilience and adaptation.

Community-Based Climate Resilience

DISCUSSION

The impacts of climate change fall disproportionately on frontline communities and vulnerable populations. A history of redlining and housing exclusion has forced low-income and BIPOC communities to live in areas that have greater risk of climate impacts such as flooding and sea level rise, and greater exposure to pollution from vehicles. The 2022 floods in South Park illustrated the devastation wrought by climate impacts as people fled their homes and weeks of cleanup followed.

Climate change is not the only crisis our city faces. Climate action is interwoven with other community priorities and challenges, including public health, economic opportunity, anti-displacement, and pandemic recovery.

Community-based climate resilience builds the capacity of disproportionately impacted communities to adapt to and recover from climate impacts. Community-based organizations design and deliver community-centered programs before, during, and after climate-related and other natural hazard events to keep neighbors safe and foster greater community cohesion.

City initiatives, such as the One Seattle Climate Justice Agenda, Green New Deal, Transportation Equity Framework & Implementation Plan, and Shape Our Water, are centered on partnering with community to ensure those most impacted by systemic racism benefit from City investments and are resourced to thrive in a changing climate and evolving mobility landscape.

GOAL

CE G8 Communities have the capacity to prepare for, respond to, and recover from the impacts of climate change and other natural hazards.

POLICES

CE 8.1 Prioritize partnerships, policies, programs, and actions that reduce the disproportionate climate impacts on vulnerable populations, and frontline communities.

CE 8.2 Mitigate climate impacts by prioritizing green infrastructure and nature-based solutions that provide co-benefits to community, such as providing living wage jobs and enhancing social connectedness.

CE 8.3 Invest in community capacity to co-develop and co-lead equitable and inclusive community education and technical assistance about climate resilience, adaptation, and emergency response for individuals, businesses, and organizations.

CE 8.4 Work towards achieving racial and social equity in health outcomes so that members of all communities live long healthy lives.

CE 8.5 Mitigate the economic impacts of transitioning to zero carbon and resilience strategies on low-income residents.

Extreme Heat and Wildfire Smoke

See also Land Use Element

DISCUSSION

Seattle, one of the least air-conditioned cities in the U.S, is experiencing more frequent extreme heat events. The trend toward hotter and drier summers due to climate change impacts infrastructure, power supply, air quality, food and water supplies, and health and safety. Extreme heat affects people, pets, shellfish, birds, and other wildlife and disrupts the local food system and economy.

Extreme and extended wildfire smoke events are happening more frequently. Smoke from wildfires in Washington as well as British Columbia, Oregon, and California drift into Seattle and degrade local air quality. Smoke-filled air exacerbates the already poor air quality that many over-burdened communities, workers, and families experience from more localized sources.

Potential health impacts include dehydration, heat illness, severe respiratory distress, hypo/hyperthermia, heart attacks, strokes, internal organ failure, and even death. These events pose life-safety threats for vulnerable populations due to loss of electricity, increased drowning and recreational accidents, increased injury due to burns or smoke inhalation, and secondary illness onset or damaged infrastructure, such as delayed medical care access or impacts on hygiene and sanitation needs and access. Wildfire smoke events pose health risks to workers responding during the event and others who continue to work outdoors.

GOAL

CE G9 Seattle has planned for and adapted to the impacts of extreme heat and wildfire smoke events.

POLICIES

CE 9.1 Develop response and recovery plans specifically for extreme heat and smoke events.

CE 9.2 Design new and retrofit existing City capital facilities and infrastructure to adapt to increased temperatures, extreme heat events, and wildfire smoke.

CE 9.3 Expand tree canopy and greenspace, especially in communities that experience disproportionate impacts of extreme heat and smoke events.

CE 9.4 Encourage building design to incorporate passive cooling approaches to limit overheating and improve energy efficiency.

CE 9.5 Develop and implement strategies to mitigate the impacts of extreme heat and smoke events on the urban forest, aquatic resources, and other components of the natural environment.

CE 9.6 Coordinate with Seattle King County Public Health and Puget Sound Clean Air Agency to protect residents and outdoor workers during extreme heat and smoke events.

CE 9.7 Provide information and technical assistance to employers, building owners, and renters to make homes and workplaces safer during extreme heat and smoke events.

Sea-Level Rise and Flooding

See also the Land Use, Capital Facilities, Utilities and Shoreline Elements

DISCUSSION

Seattle experiences three types of flooding: riverine, coastal, and urban. All flooding types are expected to become more intense and more frequent due to climate drivers such as sea level rise and extreme precipitation events. Areas that have historically flooded will flood more often and new areas may experience infrequent flooding events in the future. Sea levels are projected to rise across Seattle's marine and estuarial shorelines in the coming decades, though sea-level rise will vary due to local geological conditions.

Sea levels in Puget Sound have risen nine inches since 1900 and are expected to rise another two to five feet by 2100. This means more coastal flooding, storm surge and high tide inundation, shoreline erosion, rising groundwater levels, and flood risks for infrastructure and facilities on Seattle's coasts and shorelines. Saltwater intrusion and increasing acidification and warming of Puget Sound waters will adversely affect marine organisms and habitat.

GOAL

CE G10 Seattle has planned for and adapted to impacts of sea level rise in coastal, riverine, and inland areas.

POLICIES

CE 10.1 Update City plans and projects as needed to reflect the science-based estimates of the magnitude and timing of coastal flooding related to climate change impacts.

CE 10.2 Develop a citywide sea level rise adaptation plan to guide City infrastructure investments and development to protect residents and the broader economy.

CE 10.3 Raise public awareness of how climate change affects coastal flooding and flood risk.

CE 10.4 Where feasible, use open space, green infrastructure, and other nature-based solutions to buffer communities from flooding impacts.

CE 10.5 Restore coastal environments to foster resilient ecosystems and species and consider sea level rise in restoration projects.

More Frequent Intense Storms and Longer Dry Periods

See also the Land Use and Utilities Elements.

DISCUSSION

Precipitation patterns are shifting across Seattle and the Puget Sound region. While annual precipitation will continue to remain variable, there will be seasonal shifts. Winter and fall precipitation are expected to increase and precipitation will increasingly fall as rain rather than snow. Additionally, winter precipitation may be concentrated in extreme rain events, which can exacerbate flooding risks. Summer precipitation is projected to decrease, contributing to regional heat stress, drought conditions, and water supply impacts.

Changing precipitation patterns could affect areas prone to geologic hazards, such as landslides and liquefaction. Heavy precipitation, particularly over prolonged periods, can contribute to slope instability and failure. Events like these will likely increase in frequency and intensity into the future, contributing to increased risks of landslides that cause damage and blockage to transportation routes, buildings, other infrastructure, and natural areas across the city. As sea level rises along the Seattle shoreline, water tables will also rise, increasing soil saturation and the likelihood and severity of liquefaction in the event of an earthquake, especially during the winter.

Seattle can experience water shortages during the summers that follow winters with low snowpack. The main shortage impacts are reduced stream flows for salmon, usage restrictions, and economic hardship for businesses that require large amounts of water. Less electricity is generated by hydroelectric dams, causing SCL to buy more expensive power from outside the region.

GOAL

CE G11 Seattle has planned for and adapted to the impacts of more frequent and more intense precipitation, storm events, longer dry periods, and potential water shortages.

POLICIES

CE 11.1 Improve drainage system resiliency through the use of green stormwater infrastructure.

CE 11.2 Coordinate efforts among City departments and with other public agencies to resource holistic flood hazard management and sea level rise adaptation efforts and

implement innovative approaches such as integrating publicly-owned open space into a green stormwater infrastructure system.

CE 11.3 Invest in adaptive and flexible drainage and wastewater system improvements and reduce impervious surfaces, particularly in low lying areas, high impervious surface coverage areas, and historically redlined areas.

CE 11.4 Protect the function and integrity of flood prone areas, wetlands, and fish habitat conservation areas to reduce the city's exposure to geological and flood hazards and ensure the health of sensitive habitats.

CE 11.5 Include impacts of water shortages in emergency management plans and power generation plans.

Urban Forest and Tree Canopy

See also the Parks and Open Space Element.

DISCUSSION

Seattle's urban forest is fundamental to our quality of life, especially as Seattle continues to grow and experiences the impacts of climate change. The urban forest consists of trees and associated understory plants, and provides crucial ecosystem services, such as stormwater reduction, air pollution removal, wildlife habitat, carbon storage, and reducing the heat island impacts of our warming climate. The urban forest extends across public property, private property, and the right-of-way and includes parks and natural areas, as well as the trees along streets and in yards.

Since European settlement much of the native urban forest has been logged and leveled for development. Yet the urban forest continues to hold cultural significance for Tribal communities.

The Urban Forest Management Plan guides the City's decisions to help maintain, preserve, enhance and restore its urban forest. Every five years the City undertakes a canopy cover assessment to understand how the urban forest has changed. The most recent study is the 2021 Canopy Cover Study.

GOAL

CE G12 Seattle has a healthy urban forest with a tree canopy which maximizes the environmental, economic, social, and climate-related benefits of trees.

POLICIES

CE 12.1 Aim to achieve an overall tree canopy coverage of 30% by 2037.

CE 12.2 Preserve, restore, maintain, and enhance the urban forest across the city.

CE 12.3 Consider the needs of frontline communities in all urban forestry actions.

CE 12.4 Manage the urban forest to increase its resilience to potential impacts, especially from climate change.

CE 12.5 Regularly update the tree canopy analysis to monitor changes and trends in the amount, distribution, and condition of the urban forest and use this information to shape urban forestry management plans, decisions and actions.

CE 12.6 Coordinate among City departments and collaborate with other agencies, stakeholders, and community members to increase tree canopy.

CE 12.7 Reach out to, educate, and partner with the community to identify tree planting locations, as well as care for, preserve and celebrate Seattle's urban forest.

CE 12.8 Provide support to the community, via incentives, education, and regulations, for retaining, caring for, removing, replacing, and planting trees. Consider targeted support to advance tree canopy equity.

CE 12.9 Encourage the protection, maintenance, and expansion of tree canopy throughout the community, prioritizing residential and mixed-use areas with the least current tree canopy to equitably distribute benefits.

CE 12.10 Manage parks and greenbelts to decrease climate risks, protect residents, and improve ecosystem health and habitat.

CE 12.11 Promote adequate care for newly planted trees to enable their long-term health and viability.

Water

See also Utilities Element, Water System

DISCUSSION

Seattle is a city of water. Puget Sound, Lake Washington, Lake Union, the Lake Washington Ship Canal, the Duwamish River, Green Lake, urban creeks, and small lakes all enhance the quality of life for the people and wildlife that live here. Four species of salmon—including the threatened Chinook salmon—call this area home, as do resident trout, blue herons, bald eagles, and various other water-dependent species. Seattle's major waterways bustle with business and recreational opportunities and support one of the premier industrial seaports on the West Coast. Moreover, Seattle's aquatic areas give residents the chance to enjoy and experience nature close to home.

Tribal communities have a special relationship to water resources and salmon. Salmon fishing holds deep cultural significance for native peoples, and the decline of wild salmon threatens this vital resource. As the original watershed stewards, living in harmony with nature and stewarding the waters and habitats of our region is central to tribal culture and life. The struggle to assert tribal water and fishing rights has strengthened and deepened this connection. Tribes play a leading role in the Puget Sound region's watershed restoration and salmon recovery efforts.

Despite their integral place in the local culture, landscape, and economy, Seattle's aquatic resources have been significantly degraded as a result of urban growth. A six-mile stretch of the Duwamish River is now a federal Superfund site. More than 90 percent of Seattle's 146 miles of shoreline have been modified and now lack natural connections to the water. The city's creeks have seen stormwater flows equivalent to some rivers. Fish in local waters contain high amounts of mercury and PCBs, and some of our coho salmon are dying before they can reach Seattle streams to spawn.

Climate change is a growing threat to the Puget Sound and other waterbodies. The impacts include ocean acidification, increasingly frequent and extreme storms, warming air and water temperatures, and sea-level rise.

Yet even these resources, polluted as they may be, have amazing vitality and resilience. If stewarded well by the residents of the city and region, they have the potential to become even greater assets to Seattleites in the future.

GOAL

CE G13 All water is treated as an essential resource and managed in a sustainable and integrated way.

POLICIES

CE 13.1 Control and reduce water pollution sources, as far upstream as possible.

CE 13.2 Use and encourage sustainable land management practices that preserve native vegetation, limit and mitigate impervious surface, minimize pesticides, enhance water absorption, and build soil.

CE 13.3 Support sustainable land use and development that improves urban water management.

CE 13.4 Encourage the capture and reuse of water at both the site and district scale.

CE 13.5 Restore, protect, and manage fish and wildlife habitat using comprehensive approaches, such as reconnecting floodplains, daylighting creeks, restoring native vegetation, and removing fish barriers, to accelerate ecosystem recovery of salmon, orca, and other endangered species.

CE 13.6 Increase community connections to our waterbodies and natural systems.

CE 13.7 Mitigate the impacts of climate change on Puget Sound and other Seattle waterbodies.

CE 13.8 Work to clean up existing contaminated water body sediments.

CE 13.9 Encourage action to reduce and/or slow ocean acidification in Puget Sound, including reducing GHG emissions, and reducing polluted runoff.

Air Quality

See also Transportation Element and other sections of this element for policies to reduce, and mitigate climate pollution.

DISCUSSION

Clean, healthy air is essential to daily well-being and long-term health, and the health of our environment. The Federal Clean Air Act focuses on reducing air pollution that poses the greatest health risks to our region. Air quality is monitored, and air quality regulations are enforced through the Puget Sound Clean Air Agency. In our region, particle pollution, smog, and air toxics pose the greatest risk to our well-being. Outdoor air pollution can cause heart attacks, asthma, strokes, cancer, and premature death.

Because we are concerned about our climate we also focus on the reduction of GHG emissions, which are the leading cause of climate change. In our region, climate change will likely lead to warmer, drier summers which increase levels of smog pollution, posing health risks to those with lung and heart diseases. Climate change is also increasing the frequency of wildfire smoke events in Seattle.

Unfortunately, the level to which Seattle residents experience our environmental benefits varies widely by race. Due to our historical land use patterns, the majority of residents who live closest to our city's heavily trafficked roadways are people of color and people with low incomes and thus, experience poorer air quality compared to the rest of Seattle.

GOAL

CE G14 Seattleites have equitable access to clean and healthy air.

POLICIES

CE 14.1 Work with federal, state, and regional clean air agencies to monitor air quality, enforce regulations, and meet established standards.

CF 14.2 Provide resources, education, and information to Seattle residents about causes and impacts of unhealthy air, and strategies to reduce harm.

CE 14.3 Reduce the number of vehicle trips and vehicle miles travelled to improve air quality, especially during periods of poor air quality.

CE 14.4 Use approaches, such as designating low-pollution neighborhoods, where the City can test and implement actions to improve air quality.

CE 14.5 Support the shift from fossil fuel to clean energy, including in vehicles, heating systems, equipment, and appliances.

Healthy Food System

DISCUSSION

The food system affects our everyday life in many ways. It provides the food we eat, is a major employer, is a large household expense, impacts the built and natural environment, and significantly impacts our health and the climate. The food system comprises all the ways in which food moves from farm or sea (producer) to table (consumer). That includes the farms on which it grows, the places where food is foraged, the waters and beaches where fish and shellfish are harvested, the manufacturers who process and produce foods, the venues in which the foods are delivered to the public, the way the consumer receives and consumes food, and the food waste that is generated and handled.

Healthy food is integral to the health and well-being of our communities. Healthy food is defined as food that is fresh and nutritious and grown without harming its producers or our air, water, or soil. In a healthy food system, healthy food is available and accessible for all community members. There is a strong network of successful businesses that produce, process, cook, transport, and sell that food; there are opportunities to gather, forage, and produce food locally. Food waste is prevented.

Supporting a healthy food system is important for health, the environment, economy, and community. Rising obesity and diet-related diseases increase health care costs and decrease life expectancy. One in five children in King County does not always have enough to eat, and growing economic inequality makes healthy food even harder for many to afford. Chemically intensive agriculture degrades the quality of our land, our air, and our water. Food sales, restaurants, food products, and food service are a growing sector of the local economy. Food inequities disproportionately affect low-income residents, children, seniors, and communities of color. Growing, eating, and sharing food brings local communities together.

The recent pandemic demonstrated how access to food can be quickly disrupted. Longer and dryer summers from our changing climate will also affect the food system in coming years. A resilient food system is increasingly important.

GOAL

CE G15 Seattle has an accessible, resilient, equitable, and zero-waste food system that provides easy access to fresh, affordable, nutritious and culturally relevant food.

POLICIES

CE 15.1 Expand access to culturally relevant and empowering food and nutrition education for youth, adults, and older adults.

CE 15.2 Support traditional foods and regenerative practices, locally grown and harvested foods, and community food projects, focusing on communities historically excluded from land and water access and honoring Tribal sovereignty and treaty rights.

CE 15.3 Build community food security through culturally relevant, equitable, nutritious food access.

CE 15.4 Create an equitable, fair, and healthy local food economy for workers, businesses, and residents.

CE 15.5 Foster equitable, environmentally sustainable, and strengthened local food supply chains.

CE 15.6 Strive to prevent food waste, rescue and redistribute surplus food for people who need it, and locally compost the rest.

CE 15.7 Reduce climate pollution associated with Seattle's food system and support regenerative food production practices that improve the environment.

Parks and Open Space

Introduction

Parks and open spaces help make Seattle a great place to live, play, and raise families. These places contribute not only to the city's environmental health but also to the physical and mental health of its residents. Access to open space can benefit individuals by giving them places to exercise their bodies and refresh their minds. Open spaces support an amazing diversity of life. Thousands of plant and animal species can be found in Seattle's natural areas. This urban biodiversity provides ecosystem services such as cleaning air and water, and providing valuable wildlife and vegetation habitat that might otherwise be scarce in the city. Parks and open space help make cities livable.

Public space includes any outdoor, publicly accessible area dedicated primarily to human or environmental use (exclusive of transportation use). Seattle has more than 1,000 public spaces owned and managed by several different agencies and private entities, comprising about 20 percent of the total city land area. Public spaces include gardens, plazas, trails, schoolyards, parks, natural areas, and more. From the magnificent views from the bluffs of Discovery Park to the tree-lined boulevard system and intimate pocket parks, these areas provide opportunities for residents and

visitors to relax, play, exercise, or meet with friends and neighbors. The public right-of-way, comprising about 30 percent of the City's land area, is public land primarily used for transportation, but is sometimes used as public space either temporarily or permanently such as along Cheasty and Ravenna Boulevards or in Bell Street Park.

Off-road bike trails, including the Burke-Gilman Trail and Alki Beach Park, offer other types of active recreation. An extensive system of P-Patches and other community gardens throughout the city offer gardening spaces for residents to grow their own fruits, vegetables, and flowers. Seattle Center and the Central Waterfront are also City-owned and managed public spaces offering unique urban amenities of open space and a wide variety of programs and cultural activities.

Seattle's park system includes extensive areas of forest, meadow, shorelines and marine reserves. Natural areas within parks are established for the protection and stewardship of wildlife, habitat and other natural systems support functions such as stormwater management, carbon sequestration, heat island mitigation, air and water quality, erosion control and protecting environmentally sensitive areas. Many different public spaces in Seattle are owned and maintained by entities other than the City. These include fields and playgrounds at public and private schools, areas such as the federal Chittenden Locks, several waterfront access points provided by the Port of Seattle, and the open spaces on several college and university campuses. Numerous private developments have made plazas and other open areas available to the public, such as Waterfall Garden Park in Pioneer Square.

Puget Sound and the city's lakes provide another form of open space. These wide stretches of water are open to the sky and offer visual relief from the urban environment, as well as visual connections to other areas of the city and region.

Public spaces are also important places for supporting artistic and cultural performances, festivals, events, and public gatherings.

City-owned park and recreation lands are protected by a 1996 voter-initiated and approved legislation, Initiative 42. It sets out a process for considering the transfer or change in use of any lands held for park and recreation purposes, and requirements for replacing park and recreation lands lost.

In 2014 voters in Seattle approved the formation of the Seattle Park District. This district implements a new taxing authority and funding source for the maintenance and improvement of City parks, as well as for programs aimed at serving historically underserved residents and communities. Some of the ways the City obtains new parkland are by using state funds, acquiring surplus federal land, establishing requirements for new development projects, providing incentives for developers, and creatively using public rights-of-way.

The Capital Facilities Appendix includes a high-level inventory of City-owned parks. The 2024 Parks and Open Space Plan, updated by Seattle Parks and Recreation every six years, provides additional information about where park development, improvements and maintenance projects should occur and where open space should be prioritized for acquisition.

Access to Public Space

See also the Capital Facilities Element.

DISCUSSION

While Seattle has one of the best public space networks in the country overall, some neighborhoods are better served than others, with more public space being concentrated in affluent and majority white neighborhoods. There are also disparities in vulnerability to climate impacts that disproportionately affect low-income communities and communities of color. Public spaces can reduce these climate impacts on residents. But major public space investments can also have negative impacts on neighborhood affordability.

The City of Seattle is continuously working to improve equity and fairness in our public space system. As the City works to improve and add open space to decrease these disparities, it is important to prioritize preserving community stability and affordability while making such investments. In addition to improving access to public space for communities of color, it is also important to improve the responsiveness of those spaces to the needs, interests, and cultures of the people they serve.

At the same time, the City continues to look for ways to improve this system. Seattle is already very developed, so there aren't many opportunities to find new land for parks and open spaces. Creating the system that we desire—one that will address existing inequities and serve our growing population—will require new strategies, including strategies to increase capacity and add new opportunities within existing parks. The City also strives to make parks and recreation facilities more accessible to those with limited mobility and other physical challenges. The City continues the necessary work to remove documented barriers as well as incorporate accessibility improvements in all capital projects.

This section addresses the design and distribution of our citywide public space system, including how new parks and open space are acquired and developed and existing public spaces improved.

GOAL

P G1 Public spaces are expanded and enhanced as the city grows, and current inequities are addressed, so that everyone has access to the full range of recreational, social, cultural, and health benefits that public spaces provide.

POLICIES

P 1.1 Create new and enhanced public spaces in areas that lack them, especially where population growth is anticipated in the Growth Strategy, including the greater downtown area.

P 1.2 Provide a variety of public spaces to serve the city's current and future population consistent with the priorities identified in the City's Parks and Open Space Plan.

P 1.3 Identify opportunities to develop new public spaces or enhance existing public spaces to accommodate a wide variety of uses and public benefits, including: community gathering and social connection; cultural expression and celebration; civic action and democratic expression; respite and connection to nature; physical activity, health, and well-being; and food security and local economic vibrancy.

P 1.4 Enhance and activate public spaces that are currently underused due to lack of investment.

P 1.5 Equitably expand access to existing public spaces, including by providing safe, multi-modal connections to surrounding communities.

P 1.6 Plan for all ages and abilities access by transit, bicycle, and foot when siting and designing new park facilities or improving existing ones.

P 1.7 Design healthy public spaces considering the needs of varying age groups including young children and their caretakers, school-aged children, teenagers, and older adults.

P 1.8 Continue to develop a network of all ages and abilities trails that connect to public spaces and shorelines.

P 1.9 Explore how existing rights-of-way can be repurposed to create more public space for temporary uses, such as community events, street fairs, farmers' markets, arts and cultural events and neighborhood celebrations.

P 1.10 Identify opportunities to convert rights-of-way to permanent public space uses, such as gardens, play areas, urban plazas, and wildlife corridors.

P 1.11 Consider temporarily or permanently restricting general purpose vehicle usage on rights-of-way within or directly adjacent to public space and shorelines to improve usability, non-motorized access, and the recreational value of these public spaces.

P 1.12 Provide areas to preserve or restore important natural or ecological features and allow people access to these spaces by building or expanding trail systems through greenbelts and other natural areas while protecting habitat and wildlife.

P 1.13 Create connections between natural areas and open spaces for both people and wildlife using habitat corridors, green streets, pollinator pathways, and other green connections.

P 1.14 Provide sustainable public access to shorelines by improving shoreline street ends, applying shoreline regulations, acquiring waterfront land, removing shoreline armoring, and restoring coastal habitat.

P 1.15 Encourage private development to incorporate on-site open space that is welcoming and accessible to all populations.

P 1.16 Consider the use of open space impact fees to support public space system expansion and enhancement that will serve expected population growth.

P 1.17 Maintain, expand, or initiate cooperative agreements with Seattle Public Schools, universities, and other public or private agencies to provide or expand access to open spaces they control and increase the tree canopy and green space they provide.

P 1.18 Prioritize investments in recreation programs and facilities that reduce disparities in health outcomes and neighborhood environmental quality.

P 1.19 Mitigate the noise and air pollution impacts on public space from adjacent busy roadways, especially in neighborhoods with poor health outcomes, using strategies such as noise walls, vegetated buffers, and roadway design and management, repurposing, or removal.

P 1.20 Design open spaces that protect the natural environment and provide light, air, and visual relief within the built environment.

P 1.21 Design public spaces to provide multiple benefits, such as providing a variety of recreational uses and environmental functions, such as stormwater capture and urban heat relief.

P 1.22 Engage with community members to design and develop parks and recreation facilities based on the specific needs and cultures of the communities the park is intended to serve.

P 1.23 Prioritize cleaning up contaminated sites in historically underserved neighborhoods, particularly on sites dedicated or planned for community-serving or environmental uses.

P 1.24 Create opportunities to use existing public land and buildings for public space and recreation, such as reallocation of the right-of-way, integration with green and climate and hazard-resilient infrastructure, removal, lidding, or redesign of highways and streets to create public space or multimodal trails, addition of green or accessible roofs on public buildings, and redesign of single-purpose or fee-based public spaces, especially near high-capacity transit.

P 1.25 Incorporate weather protection for outdoor equipment such as playgrounds, weather-mitigating elements, and appropriate programming for all seasons and times of day.

P 1.26 Consider joint-use or mixed-use development opportunities, such as a community center with housing or office above, where appropriate.

P 1.27 Consider a range of alternative financing strategies, including, where feasible, value capture tools, to build, improve, or maintain public spaces.

P 1.28 Increase access to culturally relevant healthy foods, particularly in locations with poor access to grocery stores, by increasing community gardening opportunities on public green space.

P 1.29 Incorporate Indigenous ecological and cultural knowledge in open space design, plant selection, and interpretive elements.

Recreation, Activation, and Programming

DISCUSSION

Recreational opportunities, activation, and programming of our public spaces help to ensure that all residents can enjoy the benefits of healthy activities, social interaction, and experiences that promote overall well-being.

Recreational opportunities should address the diverse needs, abilities, and interests of individuals, offering opportunities for physical activity, leisure, and play.

Activation refers to the design and utilization of public spaces to create vibrant and engaging environments. Through thoughtful activation strategies, public spaces can become lively gathering spots that stimulate community interaction, cultural exchange, and economic vitality. This involves organizing events, festivals, performances, and markets that celebrate diversity and local talents, attracting people from different backgrounds and fostering a sense of belonging. By activating public spaces in an equitable manner, cities can combat social isolation, break down barriers, and create spaces that are truly welcoming for everyone.

Programming in public spaces refers to the planning and coordination of activities and services that cater to the diverse needs and interests of the community. It involves offering a range of programs, such as educational workshops, art installations, fitness classes, and community events that are accessible, inclusive, and representative of the community's demographics. By incorporating programming that addresses the specific needs and interests of marginalized communities, public spaces can become platforms for empowerment, learning, and cultural expression.

GOAL

P G2 People of all ages, abilities, and incomes have access to a rich variety of culturally relevant, affordable recreational and social activities and events.

POLICIES

P 2.1 Develop activities at parks and community centers based on the specific needs of each community they serve.

P 2.2 Promote the use of open spaces and park facilities for events that celebrate our history and the many cultures of our communities.

P 2.3 Provide welcoming, culturally informed, accessible, and affordable recreation and social programs, equipment, and facilities for people of all ages and abilities and all

cultural and linguistic backgrounds, while prioritizing opportunities for young children and their caretakers, older adults, and marginalized communities.

P 2.4 Develop programs that foster awareness and appreciation of nature, wildlife, and biodiversity from the neighborhood scale to the regional scale and provide activities for residents to help protect or restore the environment.

P 2.5 Integrate opportunities for nature play and social interaction into public spaces and along trails or walkways.

P 2.6 Consider removing barriers for the sale of food and alcoholic and other beverages within public spaces to increase activation and usage.

P 2.7 Support free and affordable arts and cultural activities and performances in public spaces, particularly those led by BIPOC organizations and individuals. Support artists to design permanent and temporary improvements and installations in public space.

P 2.8 Encourage safe and welcoming evening experiences in nightlife areas and encourage a greater diversity of activities in the adjoining public spaces.

Operations and Maintenance

See also the Capital Facilities Element.

DISCUSSION

The upkeep and effective management of public spaces helps them to remain accessible, safe, and inclusive for all individuals in the community. Equitable maintenance practices prioritize the needs of BIPOC, low-income, and other underserved populations, ensuring that public spaces in their neighborhoods receive the same level of attention and care as those in more affluent areas. The maintenance of public spaces can contribute to creating healthier and more sustainable communities. This includes implementing sustainable landscaping practices, water conservation measures, and environmentally friendly maintenance techniques that minimize negative impacts on the surrounding ecosystem.

GOAL

P G3 Public space operations and maintenance practices contribute to healthy urban ecological systems, protect historical and cultural resources, reduce unjust environmental burdens, and ensure access to high-quality public spaces for all.

POLICIES

P 3.1 Work to limit water and energy use, eliminate pesticide use, and maximize environmental sustainability in parks and open space construction and maintenance activities.

P 3.2 Protect habitat and wildlife areas through education, interpretation, and wildlife-management programs.

P 3.3 Preserve and reclaim park property for public use and benefit and ensure continued access to parkland for the growing population.

P 3.4 Leverage public space capital and program investments and agreements with private vendors to provide training, apprenticeships, youth employment, and living wage job opportunities for members of marginalized communities.

P 3.5 Improve environmental quality by reducing pollution and emissions in public space maintenance, irrigation, and land management practices.

P 3.6 Site maintenance and operation facilities that provide local environmental and economic benefits in communities with greater environmental burdens.

P 3.7 Adjust maintenance standards for public space and recreational facilities to reflect increasing and changing use by a growing and diversifying population.

Partnering with Communities

DISCUSSION

Partnering with communities in the design, activation, and stewardship of public spaces is key to creating inclusive and responsive environments. Resourcing community members with funding and capacity-building opportunities enables them to actively engage in these processes and have a meaningful impact. By removing current barriers such as bureaucratic hurdles and resource disparities, communities can fully participate in shaping their public spaces. Empowering community members with decision-making authority and providing them with the tools and support needed to lead these efforts ensures that public spaces genuinely address the needs, interests, and cultures of the community. This collaborative approach fosters a sense of ownership, pride, and collective responsibility, resulting in public spaces that are not only reflective of the community but also contribute to their overall well-being, social cohesion, and sense of belonging.

GOAL

P G4 Community members are empowered and resourced to activate, improve, and steer the design of public spaces in their neighborhoods.

POLICIES

P 4.1 Support community members and organizations to steer the design and development of parks and recreation facilities based on their experience of public spaces, preferred uses, perception of safety in public space, and the specific needs and cultures of the communities the park is intended to serve.

P 4.2 Establish partnerships with public and private organizations to supplement programming that supports residents' needs and interests.

P 4.3 Remove barriers and provide technical and financial support, where possible, for community-based organizations or non-profits seeking to acquire, activate, steward, or improve public spaces, particularly in underserved neighborhoods.

P 4.4 Provide green career pathways for people experiencing homelessness, Black, Indigenous, and People of Color youth, and people with limited economic opportunity by expanding job training, youth employment, conservation corps, apprenticeship, and professional development programs.

P 4.5 Partner with and support Indigenous communities and individuals to incorporate Indigenous cultures, histories, values, protection of cultural and historical resources, and land management and stewardship practices in public spaces. Explore opportunities to co-manage public lands or return public land to Indigenous ownership.

P 4.6 Seek opportunities to create or repurpose public spaces specifically designed for Indigenous communities' use and cultural expression. Identify opportunities to integrate Coast Salish languages in public spaces, including naming spaces.

P 4.7 Implement community-informed equitable development strategies to prevent displacement when making major investments in trails and public spaces in high displacement risk neighborhoods.

Climate Resilient Open Space

See also the Capital Facilities and Climate and Environment Elements.

DISCUSSION

Climate change affects almost all of the City's park and recreation assets- land, buildings, recreation facilities, and other amenities. It affects not just park visitors, but workers who staff and maintain these assets. Climate resilience actions must expand to ensure Seattle's parks system is resilient to the impacts of sea level rise, heavier rains, extreme weather events, wildfire smoke, and air inversions. By incorporating climate-resilient elements into public space design, such as floodable open spaces and green stormwater infrastructure, cities can protect against climate-related threats and address the disproportionate impacts of climate change. These features provide opportunities to manage stormwater, reducing the risk of flooding, and protecting vulnerable neighborhoods. Additionally, nature-based resilience infrastructure, including bioswales, rain gardens, and green roofs, not only improve stormwater management but also enhance biodiversity and promote ecosystem services. Moreover, trees and green spaces play a critical role in mitigating extreme heat by providing shade, cooling effects, and reducing the urban heat island effect. By prioritizing climate-resilience in the public space system, cities can advance climate justice, safeguard communities, and contribute to a just transition towards a more sustainable and equitable future.

GOAL

P G5 Public spaces are healthy and resilient, and help mitigate the impacts of climate change.

POLICIES

P 5.1 Protect, restore, and expand urban forests within public spaces, particularly parks and other City-owned land and in frontline communities.

P 5.2 Develop interdepartmental partnerships to integrate green infrastructure designed to capture, clean, or re-use flood and storm water into new and existing public spaces.

P 5.3 Enhance the use of public outdoor space and community centers to provide protection from heat, smoke, and other hazard events, particularly in vulnerable communities, through tree planting, water features, shade structures, and building design.

P 5.4 Assess park infrastructure to determine what should be replaced, relocated, modified, or maintained more frequently to adapt to climate change.

P 5.5 Identify opportunities to modify parklands and facilities to provide relief from extreme heat and smoke events with features such as air conditioning, air filtration, tree groves, misting stations, spray parks and other cooling features.

P 5.6 Stabilize and enhance park saltwater shorelines with nature-based solutions to address climate impacts. Consider removing existing shoreline armoring over time.

Arts and Culture

Foreword by Owen Oliver (Quinault/Isleta Pueblo)

In 2018, I applied to a position at the City of Seattle to become the first Indigenous intern in the Office of Planning and Community Development (OPCD). OPCD, which was a bureaucratic mystery to me, soon gave me insight into the important structures that make a city succeed or fail. I took on the position as an undergraduate student at the University of Washington to move out of my comfort zone and attempt to understand how and if Coast Salish values could be implemented into the planning process of the city. For my entire life, I only saw our knowledge systems presented as artwork around the city. Rarely did I witness the authentic expression of place that combines our traditions with our history, language, and ceremony. Skeptically, I began researching Indigenous city planning texts, videos, and case studies. I even studied abroad to the University of British Columbia and took one of the few Indigenous Urban Planning classes in the world. This interest became clearer when I was introduced to members of the Papa Pounamu, Māori, and Pacific People who advise the New Zealand Planning Institute on the integration of their cultural perspectives in urban

Aotearoa (New Zealand). I asked them *what does success look like for the Papa Pounamu*? Quickly and almost as if it were prepared beforehand, a member said:

You could reach back in time, grab a chief and walk him down King Street.
There would be enough stuff to let him know he'd be home.

Since then, I have thought about this statement, using this framing in the work I do today. And while I often felt jealous of how other cities were fast-tracking this inclusion, those other places weren't my home. The answer from Papa Pounamu relates to what is unique about the land and culture we still have in Seattle. It prompts reflecting and building on our own frameworks that help us implement arts and culture in Seattle. The response to creating success is an active relationship with the ancestors in the area. The chief isn't dropped off by himself, but you are actively walking beside him, with him. Together you both are observers on an ordinary street or even one that so strongly juxtaposes a chief on a street named after the Western conceptualization of a chief… a King. And if you've succeeded in letting the chief know that he's in his homelands, you've accomplished retaining his sense of place in a constantly changing urban environment. In a broader sense, it's not about the Papa Pounamu, but about the individual who is imagining how they would bring any person of importance, father, mother, aunt, uncle, matriarch, language keeper, fisherman, elder, or youth into the vision.

A strong sense of place has always been the lifeblood of the Seattle community. Unmistakable views of Tahoma (Mt. Rainier). The deep emerald greens of the Cascades and the Olympics. Foggy mornings and liquid sunshine afternoons. We are neighbors to the glacially carved Salish Sea, home to ravens, orcas, and sand-burrowing geoducks.

With this shared appreciation of the landscape, we can continue to build the policies and implement them in the One Seattle Plan. We can get closer to being able to bring not only an ancestor of these lands to understanding that they are home but extending it to all the distinct cultural communities in Seattle. Not just the people of the past but everyone who's contributed to making Seattle extraordinary. Those communities' ancestors should be walked through a place that was built and cherished by their descendants. Seattle is already special in this situation, we've been indebted to The Gang of Four (Gossett, Maestas, Santos, Whitebear), nourished from P-Patches, and spoiled by grunge. Our communities and cultural spaces are an extension of the environment. They always have been. We can be one of the first metropolitan areas on the West Coast to lead with how we situate arts and culture through a lens of making all of our ancestors proud and our descendants thankful. It's us in the present that need to be proactive.

Art also needs to be channeled from anger, fear, and pain. It can allow for unheard communities to be known and amplified. It lets us know where we've failed in the past and how we can be accountable in the future. It lets us know how we can appreciate the things that the older generation didn't have. It lets us wonder, would a chief, whose name was given to our city, feel at home near King Street Station? Where much of his life he knew it as dᶻidᶻəlal'ič (little crossing over place).

Introduction

Arts and culture are part of Seattle's rich history and play an important role in Seattle's future as a vibrant city where diverse communities will thrive. From the Coast Salish people, original stewards of this place, through colonization and waves of newcomers from around the world, the arts and culture of the people of this region enrich our lives and inspire our collective and individual creativity and innovation.

Arts and culture extend to all aspects of civic life for people of all ages. The city's arts and cultural scene creates jobs and attracts visitors, customers, and highly skilled workers to the area. At the same time, arts and culture play an important social role by nurturing a welcoming and diverse urban community. Arts and culture can expand perspectives and encourage empathy toward people with different experiences. They help cultivate a greater appreciation and understanding of diverse cultures across Seattle.

The Arts and Culture element of this Plan outlines goals and policies related to the arts, cultural institutions, cultural preservation and place-keeping, the creative economy, and arts-education. Together these aspects of the city encompass a broad range of people, activities, spaces, and levels of involvement. The City is committed to supporting the arts and to offering a greater experience for arts consumers and creators of art across Seattle. Making arts and culture accessible to all requires programs that represent Seattle's diverse communities.

Experiencing arts and culture should be fun and challenging. It should also be accessible so that it can be enjoyed regularly by all. There are many ways to experience art. It can be created or observed or made in collaboration. From tangible, physical objects, books, and digital works to experiences, gatherings, performances, and oral histories, the Seattle arts scene has many different points of entry. Cultural spaces are varied and can range from traditional theaters, galleries, and studios to schools, parks, libraries, and coffee shops.

Cultural Spaces, Place-making, and Place-keeping

DISCUSSION

Every successful neighborhood includes cultural spaces, which not only house a range of cultural activity but also help define the very social character and identity of neighborhoods. This includes a wide variety of community gathering spaces where people engage with a myriad of artforms and can support artists, watch performances, listen to authors and storytellers, and learn dance and other artforms. Creative place-making and place-keeping uses arts and culture to increase the vibrancy of neighborhoods, cities, and regions.

Cultural spaces help define the social character and identity of our city and neighborhoods. As such, cultural spaces should reflect Seattle's diverse cultural communities. Cultural spaces are often the first lost when communities experience gentrification. Seattle has a rich ecosystem of organizations working to establish, support, and preserve arts and cultural life and prevent displacement in

communities at risk, including Seattle's Indigenous community, BIPOC residents of the Central Area and other historically redlined neighborhoods, and the Chinatown International District.

By 2044, Seattle's neighborhoods will have cultural spaces including theaters, galleries, art-house cinemas, museums, music venues, and artist studios that reflect the rich cultural diversity of our communities, uplifting both those whose ancestors have been here for countless generations and those whose families have moved here more recently. Communities will uplift each other through culturally relevant programming, celebration, and gathering.

GOAL

AC G1 All neighborhoods in Seattle include affordable cultural spaces that enhance urban design; promote cultural awareness, understanding, and pride; and are accessible to of people of all ages and abilities and reflect Seattle's culturally diverse communities.

POLICIES

AC 1.1 Maintain an inventory of both public and private cultural spaces that includes information about the cultural communities reflected in these spaces.

AC 1.2 Create incentives to preserve or expand space for artists, arts organizations, cultural workers, musicians, music organizations, and other cultural uses.

AC 1.3 Explore opportunities to make surplus City-owned property available to artists, musicians, and arts and cultural organizations.

AC 1.4 Encourage the adaptive reuse of historic community structures, such as meeting halls, schools, and religious buildings, for uses that continue their role as neighborhood anchors.

AC 1.5 Support public-private partnerships that provide affordable space to artists and arts organizations, musicians, and cultural organizations.

AC 1.6 Encourage partnerships to make public and institutional spaces, such as parks, community centers, libraries, hospitals, schools, universities, and City-owned places, available for arts, musicians, and culture.

AC 1.7 Partner with communities to designate cultural districts that reflect existing and hoped-for clusters of cultural spaces and activations.

AC 1.8 Encourage partnerships between the public, private, and nonprofit sectors to engage in creative place-making/or place-keeping projects, particularly as part of subarea and local area planning.

AC 1.9 Provide grants and other resources, through coordination among City departments and other non-City partners, that support communities in making their own art, music, and culture.

AC 1.10 Encourage private developers to work with local artists to incorporate culturally relevant art in new development.

AC 1.11 Invest in cultural spaces that reflect and uplift the cultures of communities who historically thrived in Seattle's neighborhoods, especially BIPOC communities that have been impacted by displacement.

AC 1.12 Encourage preservation of community murals and other artworks.

AC 1.13 Incorporate Lushootseed and other Indigenous languages in public spaces, natural, and built environments.

Public Art

DISCUSSION

Seattle strives to be a center of innovation and creativity. When the City's 1% for Art program was initially adopted in 1973, we were one of the first cities in the country to require that funds for eligible City capital improvement projects be used to commission, purchase, and install artwork in a variety of settings. More recently, City departments are finding more creative ways to collaborate with local artists earlier in the planning phases of capital projects and in the creation of plans that will incorporate public art in more of our public places.

In 2044, more art will be integrated throughout Seattle's neighborhoods and reflect the cultural heritage of the diverse communities who live here. Visitors and locals alike encounter art in parks, libraries, and community centers—as well as on roadways, bridges, and other public spaces—which enriches people's daily lives and gives voice and visibility to artists of all backgrounds and cultures. The City's public art collection will continue to grow through the City's 1% for Art program, which requires that one percent of the funds from eligible capital improvement projects be set aside for the commission, purchase, and installation of artworks in a variety of settings.

GOAL

AC G2 Seattle's neighborhoods reflect creative expression and original artwork where diverse communities see their cultural identities and feel welcomed.

POLICIES

AC 2.1 Prioritize BIPOC, LGBTQIA, and artists with disabilities for new public art as part of capital improvement projects.

AC 2.2 Include artists, especially artists whose cultural communities are at risk of displacement, early in the planning and design of capital improvements.

AC 2.3 Prioritize locations for new public art where it is desired by the community, enhances the built environment, can be accommodated safely, and will be enjoyed by Seattle's diverse communities.

AC 2.4 Strengthen the diversity of expression in public art to embrace a variety of artists, sites, disciplines, and media to fully reflect the cultural diversity of the city.

AC 2.5 Create meaningful opportunities for public participation, particularly by members of surrounding communities, in the process of planning, selecting, and implementing of public art projects.

AC 2.6 Promote and support art experiences that reflect and shape the identity of a place. Design civic space to include public art that highlights the diverse cultural communities that reside in each neighborhood and enable and encourage opportunities for engagement by the community.

AC 2.7 When commissioning culturally relevant artwork, hire artists who are part of that cultural community and include, when relevant, consultation with Tribes and other Indigenous community stakeholders.

Creative Economy

DISCUSSION

Seattle's creative economy is integral to the character of our city and is a powerful sector of our local economy. From innovative musicians and visual artists to locally supported media outlets with a global impact, to the Indigenous communities that stewarded these lands for countless generations, Seattle has a rich cultural heritage.

Encompassing a wide variety of arts and cultural businesses, ranging from nonprofit museums, symphonies, and theaters, to for-profit film, architecture, and advertising companies, the creative economy also includes thousands of independent artists working in Seattle who were particularly hard hit by the COVID-19 pandemic. Many local artists, especially BIPOC artists, are finding it increasingly difficult to live and create their art in Seattle. We are planning for a future in 2044 when Seattle's artists will thrive and no longer be at risk of displacement. Arts will be woven throughout our lives and accessible to residents, students, workers, and visitors of all ages.

When supported, arts and culture can help drive and enrich the City's future economic growth. Arts companies and their employees stimulate innovation, playing an important role in building and sustaining economic vibrancy in Seattle. They employ a creative workforce, spend money locally, generate government revenue, and are a cornerstone of tourism. The arts are also an economic-development tool, creating neighborhoods where businesses want to operate, and employees want to live. The creative economy also contributes to Seattle's high-quality of life, helping our city and region attract talent from across the globe. Encouraging creative economy activities in communities of color can provide pathways to new skills, jobs, and prosperity. In other words, the impact of the arts reaches far beyond aesthetics and entertainment and helps set the foundation of community well-being.

GOAL

AC G3 Artists, creative professionals, cultural workers, and arts and cultural organizations are vital to Seattle's economic prosperity and have equitable opportunities to thrive in Seattle.

POLICIES

AC 3.1 Support arts and culture as part of an economic development strategy that leverages and expands the economic impact of the creative sector, especially in communities at higher risk of displacement.

AC 3.2 Regularly assess the economic impact of Seattle's creative sector, including arts, culture, music, film, media, and nightlife.

AC 3.3 Encourage collective action towards greater racial equity through collaboration across the spectrum of traditional arts, culture, and creative economy businesses, especially businesses that rely on innovation, design, and inclusiveness.

AC 3.4 Encourage access to affordable housing, live-work spaces, and studio space for creative projects and arts, heritage, and cultural organizations.

AC 3.5 Provide technical and financial assistance and offer community building activities that connect with and serve artists, musicians, arts organizations, cultural and live music venues of various sizes and at various stages of growth and that represent a broad range of cultures.

AC 3.6 Implement strategies that enhance access to technical and financial assistance for all artists and cultural organizations, particularly from historically underserved communities and those who are at higher risk of displacement.

AC 3.7 Work with public, not-for-profit, and private for-profit organizations to support artists, arts organizations, and cultural organizations to help them thrive.

AC 3.8 Integrate and invest in the creative expertise of a diversity of artists, creatives, cultural workers, and arts, culture, and heritage organizations.

AC 3.9 Pursue cultural investment strategies, funding programs, and community partnerships through an anti-racist and intersectional lens that centers shared decision-making and collective partnership with communities.

AC 3.10 Enhance access to a variety of arts, music, and cultural institutions and programs for youth, especially at-risk youth, non-English-speaking residents, seniors, the visually and hearing impaired, and people with other disabilities.

AC 3.11 Recognize the importance of live music and entertainment venues to the vibrancy of the city's culture and economy. Support the viability of these small businesses and nonprofits in areas at higher risk of displacement through policies that proactively engage and balance the interests of music venues and new residents.

Youth Development and the Arts

DISCUSSION

All young people should be given the chance to learn through the arts. The arts develop skills such as creative and critical thinking, communication, collaboration, and perseverance—skills directly linked to success in school, career, and life.

Partnerships, both inside and outside of City government, are needed to ensure equitable access to arts education for all young people. Through arts education programs, experienced teaching artists, community groups, and cultural organizations can introduce children to all types of art, including visual arts, theater, dance, and film. Providing resources for arts education programs for low-income students is especially important because without support they would not be able to participate.

GOAL

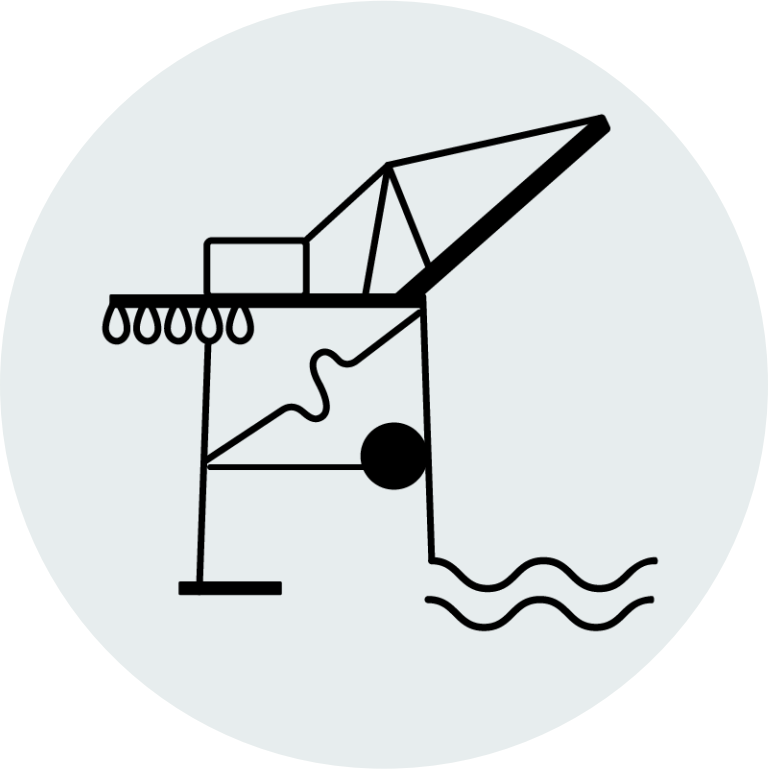
AC G4 Young people have access to arts, cultural, and music educational opportunities that foster the creative skills they need to succeed in live and thrive in our communities.

POLICIES

AC 4.1 Partner with schools, community centers, libraries, and community organizations to offer culturally responsive arts curricula for young people and to provide professional development in arts education for teachers and community arts partners.

AC 4.2 Prioritize support for arts and music education that provide opportunities for youth furthest from educational and economic justice and for youth with limited or no access to art programs.

AC 4.3 Incorporate opportunities for youth engagement, participation, and leadership in the planning and design of programs and capital projects, especially in areas at higher risk of displacement.



Container Port

Introduction

One of the factors behind Seattle's strong economy is the city's role in importing and export- ing goods. The Port of Seattle operates one of the largest container-shipping facilities on the West Coast. Not only do the workers who move cargo in and out of the shipping terminals make good wages, but exporting goods made in the Seattle area brings additional money into the regional economy. The Land Use, Transportation, and Economic Development elements of this Plan contain related policies about the importance of these areas and how the City regulates uses and provides critical transportation services to them.

GOAL

CP G1 Maintain viable and thriving import and export activities in the city as a vital component of the city's and the region's economic base.

POLICIES

CP 1.1 Help preserve cargo-container activities by retaining industrial designations on land that supports marine- and rail-related industries, including industrial land adjacent to rail- or water-dependent transportation facilities.

CP 1.2 Continue to monitor the land area needs, including those related to expansion of cargo container–related activities, and take action to prevent the loss of land needed to serve these activities.

CP 1.3 Discourage nonindustrial land uses, such as retail and residential, in industrially zoned areas to minimize conflicts between uses and to prevent conversion of industrial land in the vicinity of cargo-container terminals or their support facilities.

CP 1.4 Consider how zoning designations may affect the definition of highest and best use, with the goals of maintaining the jobs and revenue that cargo-container activities generate and protecting scarce industrial land supply for cargo-container industries, such as marine- and rail-related industries.

CP 1.5 Consider the value of transition areas—which allow a wider range of uses while not creating conflicts with preferred cargo-container activities and uses—at the edges of general industrial zones. In this context, zoning provisions such as locational criteria and development standards are among the tools for defining such edge areas.

CP 1.6 Monitor, maintain, and improve key freight corridors, networks, and intermodal connections that provide access to cargo-container facilities and the industrial areas around them to address bottlenecks and other access constraints.

CP 1.7 Provide safe, reliable, efficient, and direct access between Port marine facilities and the state highway or interstate system, and between Port terminals and railroad intermodal facilities, recognizing that Port operations must address other transportation needs, such as pedestrian safety.

CP 1.8 Make operational, design, access, and capital investments to accommodate trucks and railroad operations and preserve mobility of goods and services. Improvements may include improvement of pavement conditions, commute trip reduction strategies, roadway rechannelization to minimize modal conflicts, use of intelligent transportation systems, construction of critical facility links, and grade separation of modes, especially at heavily used railroad crossings.

CP 1.9 Maintain a City classification for freight routes to indicate routes where freight will be the major priority. Street improvements that are consistent with freight mobility but also support other modes may be considered in these streets.

CP 1.10 Identify emerging cargo-container freight transportation issues by working with affected stakeholder groups, including the Seattle Freight Advisory Board. Provide

regular opportunities for communication between the City, the freight community, other affected communities, and other agencies and stakeholders.

CP 1.11 Continue joint City and Port efforts to implement relevant Port recommendations, such as recommendations contained in the Container Terminal Access Study.

CP 1.12 Given the importance of cargo container–terminal operations to the state and regional economies, develop partnerships within the City, the Port, the region, and the State to advocate for project prioritization and timely funding to improve and maintain freight infrastructure, and explore funding partnerships.

CP 1.13 Maintain consistency between local, regional, and State freight-related policies.

CP 1.14 Encourage the siting of new businesses that support the goals for cargo-container activities in the City's manufacturing/industrial centers.

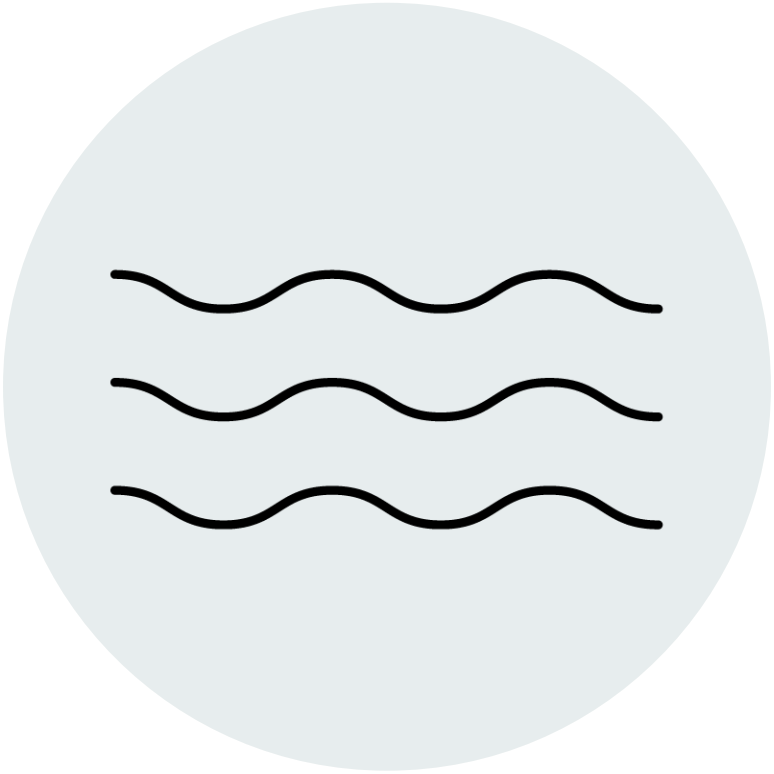
CP 1.15 Work cooperatively with other agencies to address the effects of major land use and transportation projects to avoid or mitigate construction and operational effects on the cargo container–industry sector.

CP 1.16 Facilitate the creation of coalitions of industrial businesses, vocational training and other educational institutions, and public agencies to help develop training programs to move trained workers into cargo container–related jobs.

CP 1.17 Identify opportunities to achieve economic, community, and environmental benefits from the development and operations of cargo container–related activities, including access to employment for historically excluded populations.

CP 1.18 Form partnerships with nonprofit, community-based, private, and public stakeholders to establish environmental improvement goals, including carbon dioxide emission reductions, stormwater management, redevelopment and cleanup of existing marine industrial properties, sustainable design, and fish- and wildlife-habitat improvements. Develop strategies to achieve these goals that include developing funding mechanisms and legislative support.

CP 1.19 Work with nonprofit, community-based, private, and public stakeholders to formulate plans for public open space, shoreline access, and fish- and wildlife-habitat improvements that incorporate community needs and area-wide habitat priorities with the need to maintain sufficient existing marine industrial lands for present and anticipated cargo-container needs.



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Shoreline Areas

Introduction

Land near the City's major water bodies—Puget Sound, Lake Washington, Lake Union, the Lake Washington Ship Canal, and the Duwamish River—has special importance to the city, its residents, and its businesses. These areas are covered by the State Shoreline Management Act. The City has adopted the Seattle Shoreline Master Program to describe the rules that govern the functions allowed in shoreline areas. Some businesses—like cargo terminals and boat repair—need to be right on the water. Shoreline areas also provide space for recreation, public access and viewing, and natural areas. This element of the Plan guides how the City will set rules for the development that goes in the city's shoreline areas. Together with the Shoreline Master Program regulations in the City's Land Use Code, maps of the locations of shoreline environments, and the Shoreline Restoration and Enhancement Plan, these policies constitute the Seattle Shoreline Master Program.

Because these policies were originally adopted through a separate process, they use a slightly different numbering system than the rest of the Plan.

Note: This element was not updated as part of the One Seattle Plan process (2020-2025).

Shoreline Use

GOALS

SA G1 Encourage shoreline uses that result in long-term over short-term benefit.

SA G2 Define appropriate uses for specific segments of the shoreline.

SA G3 Locate uses that are not water dependent or water related on upland lots to optimize shoreline use and access.

SA G4 Protect ecological function of those areas of shoreline that are biologically significant or that are geologically fragile.

SA G5 Restore and enhance ecological function through nonregulatory programs and policies.

POLICIES

SA P1 Allow only those uses, developments, and shoreline modifications that retain options for future generations, unless identified benefits clearly outweigh the physical, social, environmental, and economic loss over a twenty-year planning horizon. Use preference will be given in the following order:

1. On waterfront lots:
    a. Uses that protect or restore and enhance natural areas and ecological processes and functions, particularly those areas or systems identified as containing or having unique geological, ecological, or biological significance.
    b. Water-dependent uses—uses that cannot exist outside a waterfront location and are dependent on the water by reason of the intrinsic nature of operations.
    c. Water-related uses—uses or portions of uses not intrinsically dependent on a waterfront location but whose economic viability is dependent upon a location in the shoreline district because
        i. the use has a functional requirement for a waterfront location, such as the arrival or shipment of materials by water (a substantial portion of up to 50 percent of its product or materials arrive by vessel), or the need for large quantities of water in the use;
        ii. material is stored that is transported by a vessel and is either loaded or off-loaded in the shoreline district; or
        iii. the use provides a necessary service supportive of water- dependent uses, and the proximity of the use to its customers makes its services less expensive and/or more convenient.
    d. Water-enjoyment uses—those uses that facilitate public access to the shoreline as a primary characteristic of the use; or uses that provide for recreational use or

aesthetic enjoyment of the shoreline for a substantial number of people as a general characteristic of the uses and which, through location, design, and operation, ensure the public's ability to enjoy the physical and aesthetic qualities of the shoreline. In order to qualify as a water-enjoyment use, the use must be open to the general public, and the shoreline-oriented space within the project must be devoted to the specific aspects of the use that foster shoreline enjoyment.

e. Floating home uses existing as of January 2011, which are considered conforming preferred uses because of their historic role and legal recognition by the City. The intent of this policy is to recognize the existing floating home community in Lake Union and Portage Bay, while protecting natural areas, preserving public access to the shoreline, and preventing the displacement of water-dependent commercial and manufacturing uses by new floating homes. Applicable development and Shoreline Master Program regulations may impose only reasonable conditions and mitigation that will not effectively preclude maintenance, repair, replacement, and remodeling of existing floating homes and floating home moorages by rendering these actions impracticable.
f. Single-family residential uses—these are preferred uses when they are appropriately located and can be developed without significant impact to ecological functions or displacement of water-dependent uses.
g. Uses that are not water dependent with regulated public access or with ecological restoration and enhancement.
h. Uses that are not water-dependent, water-related, or water-enjoyment uses as defined above, without regulated public access or ecological restoration and enhancement.

2. On upland lots: preferred uses are those that complement uses on adjacent waterfront lots.
3. The preference for protection of the ecological conditions of the shoreline shall be accomplished by prohibiting uses that would negatively impact natural areas, by providing mitigation for negative impacts caused by the use and by providing restoration and enhancement of natural areas where they are degraded.
4. Preferred uses will vary according to the purpose of the shoreline environment.
    a. Where the purpose of the environment is to encourage water-dependent and water-related uses, these uses shall be preferred by prohibiting and/ or restricting the number of uses that are not water dependent or water related allowed on waterfront lots.
    b. Where the purpose of the environment is to provide public access, these uses shall be preferred by allowing uses that provide public access.
    c. Where the purpose of the environment is to protect ecological processes and functions, uses that achieve this purpose shall be preferred.

SA P2 In the Land Use Code, identify appropriate shoreline uses and related standards, and provide site-development standards and other appropriate criteria indicating minimal acceptable standards to be achieved.

SA P3 Allow people to live aboard vessels in moorage areas, and provide standards that mitigate the impacts of live-aboard uses on the shoreline environment.

SA P4 Allow a wider range of uses on upland lots than on waterfront lots in order to support water-dependent and water-related uses on waterfront lots, while avoiding potential incompatibility with those uses.

Shoreline Access

GOALS

SA G6 Maximize public access—both physical and visual—to Seattle's shorelines.

SA G7 Preserve and enhance views of the shoreline and water from upland areas, where appropriate.

POLICIES

SA P5 Enable opportunities for substantial numbers of people to enjoy the shorelines by requiring access to public property located on the water and by allowing uses that are not water dependent to locate on waterfront lots when those uses provide additional public access to the shoreline and are located in waterfront areas less suited for water-dependent uses.

SA P6 Promote public enjoyment of the shorelines through public-access standards that require improvements to be safe, be well-designed, and have adequate access to the water.

SA P7 Encourage adopt-a-beach and other programs that promote voluntary maintenance of public-access areas in the shoreline district.

SA P8 Maintain standards and criteria for providing public access, except for lots developed for single-family residences, to achieve the following:

1. Linkages between shoreline public facilities via trails, paths, etc. that connect boating and other recreational facilities
2. Visible signage at all publicly owned or controlled shorelines and all required public access on private property
3. Development of bonuses or incentives for the establishment of public access on private property, if appropriate
4. Provision of public-access opportunities by public agencies such as the City, Port of Seattle, King County, and the State at new shoreline facilities (encourage these agencies to provide similar opportunities in existing facilities)
5. View and visual access from upland and waterfront lots
6. Prioritization of the operating requirements of water-dependent uses over preservation of views
7. Protection and enhancement of views by limiting view blockage caused by off-premises signs and other signs

SA P9 Waterways, which are public highways for watercraft providing access from land to water and from water to land platted by the Washington State Harbor Line

Commission for the convenience of commerce and navigation, in Lake Union and Portage Bay, are for public navigation access and commerce, and in general, the City shall not request that the designation be removed from waterways. The City may request that waterways be vacated only when the City reclaims the area as street right-of-way or for public park purposes. The City may request that the dry land portion of a waterway be redesignated for the additional purpose of providing permanent public-access improvements.

SA P10 Shoreline street ends are a valuable resource for public use, access, and shoreline restoration. Design public or private use or development of street ends to enhance, rather than reduce, public access and to restore the ecological conditions of the shoreline.

Transportation in the Shoreline

GOALS

SA G8 Provide a transportation network that supports and enhances use of and access to the shorelines.

SA G9 Relocate or demolish transportation facilities that are functionally or aesthetically disruptive to the shoreline, such as the aerial portion of the Alaskan Way Viaduct on the Central Waterfront between King Street and Union Street.

POLICIES

SA P11 Encourage the transport of materials and cargo in the shoreline district via modes having the least environmental impact.

SA P12 Encourage large vessels (cruise ships and cargo-container ships) to connect to dockside electrical facilities or use other energy alternatives while in port in order to reduce engine idling and exhaust emissions.

SA P13 Discourage, and reduce over time, vehicle parking on waterfront lots in the shoreline district.

SA P14 Encourage the maintenance and future development of intermodal commuter ferry services to complement other public transportation systems, from both intracity locations and elsewhere in the region.

SA P15 Provide public transportation convenient to the shoreline.

SA P16

1. Locate streets, highways, freeways, and railroads away from the shoreline in order to maximize the area of waterfront lots. Discourage streets, highways, freeways, and railroads not needed for access to shoreline lots in the shoreline district. A replacement for the State Route 99 Viaduct with a tunnel and/or a surface roadway may be located in the shoreline

district because it represents a critical link in the transportation network.

2. To facilitate expeditious construction in an environmentally and fiscally responsible manner, standards for major state and regional transportation projects should be considered that will allow flexibility in construction staging, utility relocation, and construction-related mitigation and uses, provided that the projects result in no net loss of ecological function.
3. Prohibit aerial transportation structures over thirty-five feet high, such as bridges and viaducts, on the Central Waterfront in the shoreline environments between King Street and Union Street, except for aerial pedestrian walkways associated with Colman Dock, in order to facilitate the revitalization of Downtown's waterfront, provide opportunities for public access to the Central Waterfront shoreline, and preserve views of Elliott Bay and the land forms beyond.

SA P17 The primary purpose of waterways in Lake Union and Portage Bay is to facilitate navigation and commerce by providing waterborne access to adjacent properties, access to the land for the loading and unloading of watercraft, and temporary moorage. Waterways are also important for providing public access from dry land to the water.

SA P18 Public access shall be the preferred use for vacated rights-of-way. Public rights-of-way may be used or developed for uses other than public access, provided that such uses are determined by the City to be in the public interest, and that public access of substantial quality and at least comparable to that available in the right-of-way is provided.

Shoreline Protection and Restoration

GOALS

SA G10 Require that no net loss of ecological functions occurs as a result of uses, development, shoreline modifications, maintenance activities, or expansion of existing uses.

SA G11 Identify those areas of shorelines that are geologically or biologically unstable, fragile, or significant, and regulate development to prevent damage to property, the general public, aquatic and terrestrial species, and shoreline ecological functions.

SA G12 Preserve, protect, and restore areas necessary for the support of terrestrial and aquatic life or those identified as having geological or biological significance.

SA G13 Use scientific information to guide shoreline protection, enhancement, and restoration activities.

SA G14 Address and minimize the impacts of sea-level rise on the shoreline environment with strategies that also protect shoreline ecological functions, allow water-dependent uses, and provide public access.

SA G15 Encourage the establishment of marine protected areas, where appropriate.

SA G16 Restore lower Duwamish watershed habitat and marine ecology while sustaining a healthy and diverse working waterfront in this urban industrial environment.

SA G17 Strengthen the vitality of a functioning ecosystem within Water Resource Inventory Areas (WRIA) 8 and 9 by integrating development projects into their surrounding environments, by supporting a diversity of habitats, and by strengthening connections between habitats throughout each watershed.

POLICIES

SA P19 Use mitigation sequencing to meet no net loss of ecological functions. Mitigation sequencing refers to taking steps in this order: avoid, rectify, minimize, and/or compensate for the loss to ecological functions.

SA P20 Protect the natural environment of the shoreline through development regulations that include a requirement to use best management practices to control impacts from construction and development activities.

SA P21 Regulate development on those areas of shorelines that are biologically significant or geologically fragile to prevent harm to property, organisms, or the general public.

SA P22 Develop methods to measure both the impacts of development in the shoreline district and the effects of mitigation so that no net loss of ecological function occurs through development projects.

SA P23 Monitor the benefits of mitigation techniques to determine which are best suited to meet the goal of no net loss of ecological function.

SA P24 Conserve existing shoreline vegetation and encourage new shoreline plantings with native plants to protect habitat and other ecological functions, reduce the need for shoreline stabilization structures, and improve visual and aesthetic qualities of the shoreline.

SA P25 Avoid development in areas identified as special wildlife or priority saltwater or freshwater habitat unless no feasible alternative locations exist except for a water-dependent use or water-related use that has a functional requirement for a location over water and is located in saltwater habitat that is priority habitat solely due to its use by anadromous fish for migration, if the development mitigates impacts to achieve no net loss of ecological function.

SA P26 Protect environmentally critical areas as set out in the policies for environmentally critical areas and modified to reflect the special circumstances of such areas in the shoreline district.

SA P27 Require that all commercial, industrial, or other high-intensity uses provide means for treating natural or artificial urban runoff to acceptable standards. Developments with industrial or commercial uses that use or process substances potentially

harmful to public health and/or aquatic life shall provide means to prevent point and nonpoint discharge of those substances.

SA P28 Consider the Lower Duwamish Watershed Habitat Restoration Plan (Weiner, K. S., and Clark, J. A., 1996); the Port of Seattle Lower Duwamish River Habitat Restoration Plan, the Final Lower Duwamish River NRDA Restoration Plan and Programmatic Environmental Impact Statement, the WRIA 8 Chinook Salmon Conservation Plan and implementation documents, and the WRIA 9 Salmon Habitat Plan and implementation documents when conducting planning, permitting, mitigation, and restoration activities within the Duwamish/Green River and Cedar River watersheds.

SA P29 Allow dredging in the minimum amount necessary for water-dependent uses, environmental mitigation or enhancement, cleanup of contaminated materials, and installation of utilities and bridges.

SA P30 Allow fill on submerged land that does not create dry land only where necessary and in a manner that minimizes short- and long-term environmental damage, for the operation of a water-dependent or water-related use, transportation projects of statewide significance, installation of a bridge or utility line, disposal of dredged material in accordance with the Dredged Material Management Program, beach nourishment, or environmental mitigation or restoration and enhancement. Design projects to ensure no net loss of ecological function through mitigation sequencing.

SA P31 Permit landfill that creates dry land only where necessary for transportation projects of statewide significance, repair of pocket erosion for water-dependent and water-related uses, beach nourishment, or environmental mitigation or restoration and enhancement. Construct fill projects in a manner that minimizes short- and long-term environmental damage, and design projects to ensure no net loss of ecological function through mitigation sequencing.

SA P32 Work with other government agencies and shoreline users to reduce the input of pollutants, to restore contaminated areas, to control disposal of dredge spoils, and to determine the appropriate mitigation for project impacts.

SA P33 Use a restoration plan to identify areas that have potential for shoreline habitat restoration. Identify restoration opportunities that will best achieve ecological improvement, describe the appropriate restoration activities for the conditions in those areas, and provide incentives for achieving restoration of the shorelines.

SA P34 Support programs that inform the public about shoreline conservation practices, and identify methods by which public and private shoreline owners or community groups may encourage aquatic and terrestrial life, require such methods when appropriate, and provide incentives for such projects.

SA P35 Support the scientific study of the shoreline ecosystems that will provide information to help update baseline condition information; to monitor the impact of any action;

and to guide protection, restoration, and enhancement activities to meet the no net loss requirements and implement the restoration plan.

SA P36 Where applicable, new or expanded development and maintenance shall include environmental cleanup and restoration of the shoreline to comply with any relevant state and federal law.

Shoreline Economic Development

GOAL

SA G18 Encourage economic activity and development by supporting the retention and expansion of existing water-dependent and water-related businesses on waterfront lots.

POLICIES

SA P37 Support the retention and expansion of existing conforming water-dependent and water-related businesses, and anticipate the creation of new water-dependent and water-related development in areas now dedicated to such use.

SA P38 Identify and designate appropriate land adjacent to deep water for industrial and commercial uses that require such condition.

SA P39 Provide regulatory and nonregulatory incentives for property owners to include public amenities and ecological enhancements on private property.

SA P40 Identify and designate appropriate land for water-dependent business and industrial uses as follows:

1. Cargo-handling facilities:
    a. Reserve space in deep-water areas with adequate vessel-maneuvering areas to permit the Port of Seattle and other marine industries to remain competitive with other ports.
    b. Work with the Port of Seattle to develop a long-range port plan in order to provide predictability for property owners and private industry along the Duwamish River and Elliott Bay.
2. Tug and barge facilities: Retain Seattle's role as the gateway to Alaska, and ensure ample area is designated for uses that serve Puget Sound and Pacific trade.
3. Shipbuilding, boatbuilding, and repairs: Maintain a critical mass of facilities in Seattle in order to meet the needs of the diverse fleets that visit or have a home port in Seattle, including fishing, transport, recreation, and military vessels.
4. Moorage: Meet the long-term and transient needs of ships and boats including fishing, transport, recreation, and military vessels. Support long-term moorage in sheltered areas close to services, and short-term moorage in more open areas. Support the efficient use of Fishermen's Terminal, Shilshole Bay Marina, and other public moorage facilities. Protect commercial and recreational moorage from displacement by encouraging the full use of submerged lands for recreational moorage in areas less suited for commercial moorage and

less sensitive to environmental degradation. Require large recreational marinas to provide some commercial transient moorage as part of their facilities.

5. Recreational boating: Maintain diverse opportunities for recreational boaters to access the water. Allow a variety of boating facilities, from launching ramps for small "car top" or "hand-carried" boats to major marinas. Encourage recreational moorage by providing both long-term and short-term moorage at marinas and short-term moorage at cultural and recreational sites.
6. Passenger terminals: Maintain and expand the opportunity for convenient travel by ship to local and distant ports for residents and visitors. Encourage passenger-only ferries on the Central Waterfront.
7. Fishing industry: Maintain a critical mass of support services, including boatbuilding and boat repair, moorage, fish processors, and supply houses to allow Seattle fishermen to continue to service and have a home port for their vessels in Seattle waters. Recognize the importance of the local fishing industry in supplying local markets and restaurants. Recognize the economic contribution of distant-water fisheries to Seattle's maritime and general economy.

SA P41 Allow multiuse developments including uses that are not water dependent or water related where the demand for water-dependent and water-related uses is less than the land available or if the use that is not water dependent is limited in size, provides a benefit to existing water-dependent and water-related uses in the area, or is necessary for the viability of the water-dependent uses. Such multiuse development shall provide shoreline ecological restoration, which is preferred, and/or additional public access to the shoreline to achieve other Shoreline Master Program goals.

Shoreline Recreation

GOALS

SA G19 Manage and optimize publicly owned shorelines that are suitable for public recreation.

SA G20 Increase shorelines dedicated to public recreation and open space.

SA G21 Identify, protect, and reserve for public use and enjoyment areas in the shoreline district that provide a variety of public-access activities and that connect to other public-access sites so that public access is available throughout the city.

SA G22 Allow increased opportunities for the public to enjoy water-dependent recreation, including boating, fishing, swimming, diving, and enjoyment of views.

POLICIES

SA P42 Designate for water-dependent recreation, areas where there are natural beaches, large amounts of submerged land or sheltered water, and minimal heavy ship traffic or land suitable for heavy industrial activity, while protecting ecological functions.

SA P43 Provide for recreational boating facilities, including moorage and service facilities, on publicly owned land, and encourage the provision of such facilities on private property in appropriate areas that minimize environmental impacts.

SA P44 Increase publicly owned shorelines, giving priority to those areas of the City that lack recreational facilities.

SA P45 Explore alternatives to acquisition for providing public recreation at the shoreline and on the water.

SA P46 Identify submerged lands that could be used for underwater parks.

Shoreline Archaeological and Historic Resources

GOALS

SA G23 Encourage the restoration, preservation, and maintenance of areas of the shoreline having significant archaeological and historical importance.

SA G24 Encourage the restoration of archaeological and historic features of the shoreline where consistent with economic and environmental goals.

POLICIES

SA P47 Designate, protect, preserve, and support restoration of sites and areas of the shoreline district having historic or cultural significance, including through landmark designation where appropriate.

SA P48 Avoid impacts to areas identified as archaeologically and historically significant, unless no reasonable alternative locations exist and impacts to the resource are mitigated.

Shoreline Environments

DISCUSSION

State law requires that the Shoreline Master Program address a wide range of physical conditions and development settings along the shoreline. The Shoreline Master Program spells out different measures for the environmental protection, allowed uses, and development standards for each area of the shoreline. Each distinct section of the shoreline is classified as a particular environment. The environment designations provide the framework for implementing shoreline policies and regulatory measures. The shoreline environments within Seattle's shoreline district are divided into two broad categories—conservancy and urban— and then subdivided further within these two categories.

The conservancy shoreline environments are less developed and provide for areas of navigation, recreation, and habitat protection. The urban shoreline environments are areas that are more developed and provide for single-family houses and water-dependent and water-related uses. The conservancy and urban shoreline environments are described in the following goals and policies.

Conservancy Shoreline Environments

GOAL

SA G25 The conservancy shoreline environments are intended to provide for navigation; public access; recreation; and protection, restoration, and enhancement of ecological functions in the shoreline district, while allowing some development if designed to protect ecological functions.

Conservancy Management (CM) Environment

GOAL

SA G26 The purpose of the Conservancy Management Environment is to preserve and enhance the shoreline environment while providing opportunities for shoreline recreation.

POLICIES

SA P49 Encourage restoration of ecological functions in areas where such function has been degraded.

SA P50 Accommodate water-oriented public infrastructure projects or such projects that require a waterfront location and that are compatible with the ecological functions of the area.

Conservancy Navigation (CN) Environment

GOAL

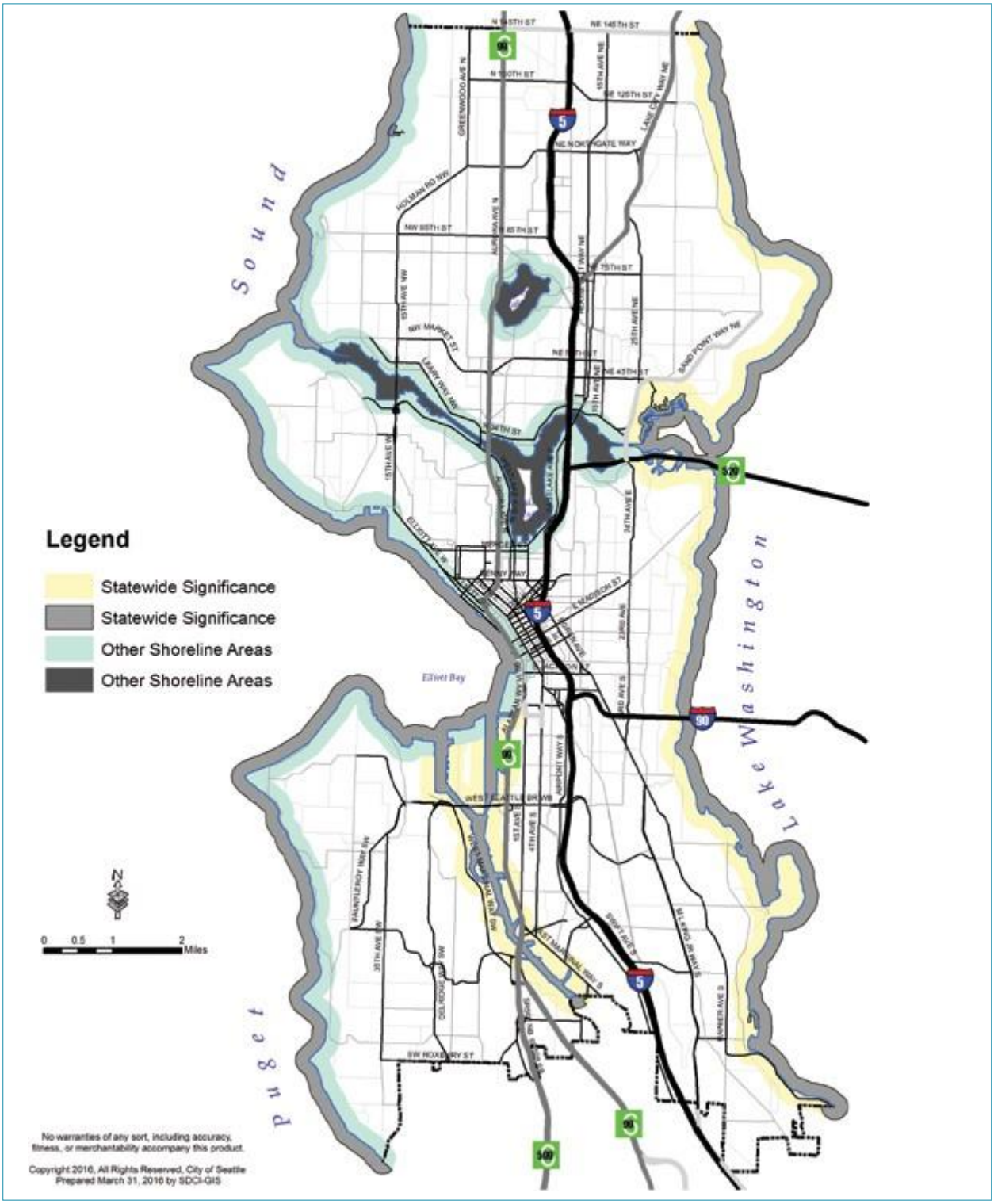
SA G27 The purpose of the Conservancy Navigation Environment is to preserve the shoreline environment while providing navigational use of the water.

POLICIES

SA P51 Allow in-water and overwater structures that are primarily for navigational purposes.

SA P52 Enhance and restore ecological function, where feasible, in areas where such function has been previously degraded.

Figure 15
Seattle Shorelines



Conservancy Preservation (CP) Environment

GOAL

SA G28 The purpose of the Conservancy Preservation Environment is to preserve, enhance, and restore the ecological functions in the shoreline district.

POLICIES

SA P53 Prohibit uses that substantially degrade the ecological functions or natural character of the shoreline.

SA P54 Prohibit commercial and industrial uses and non-water-oriented recreation.

SA P55 Prohibit parking that can be located outside the CP area.

SA P56 Limit access and utilities to those necessary to sustain permitted uses and activities.

Conservancy Recreation (CR) Environment

GOAL

SA G29 The purpose of the Conservancy Recreation Environment is to preserve and enhance the shoreline environment while providing opportunities for shoreline recreation.

POLICIES

SA P57 Prioritize public access, water-dependent recreation, and other water-oriented uses compatible with ecological protection.

SA P58 Locate public access and public recreation only where the impacts on ecological functions can be effectively mitigated.

Conservancy Waterway (CW) Environment

GOAL

SA G30 The purpose of the Conservancy Waterway Environment is to preserve and enhance the shoreline environment while providing access to the shoreline and water by watercraft.

POLICIES

SA P59 Provide navigational access to adjacent properties, and access to and from land for the loading and unloading of watercraft and temporary moorage.

SA P60 Allow in- and overwater structures only where needed for navigational purposes, temporary moorage, minor vessel repair, pedestrian bridges, and/or ecological restoration.

SA P61 Minimize impacts on navigation, public views, and ecological functions.

Urban Shoreline Environments

GOAL

SA G31 The urban shoreline environments are intended to provide for increased development of the shoreline for residential, commercial, and industrial uses while protecting ecological functions.

Urban Commercial (UC) Environment

GOAL

SA G32 The purpose of the Urban Commercial Environment is to provide for water-oriented uses of the shoreline and for uses that are not water oriented when shoreline restoration and enhancement or public access is provided.

POLICIES

SA P62 Allow uses that are not water oriented only when in combination with water-dependent uses or in limited situations where they do not conflict with or limit opportunities for water-dependent uses or on sites where there is no direct access to the shoreline.

SA P63 Require visual access to the water through view corridors or other means for commercial and larger multifamily residential projects.

SA P64 Provide for public access to the shoreline and require shoreline environmental restoration and enhancement for uses that are not water dependent.

Urban General (UG) Environment

GOAL

SA G33 The purpose of the Urban General Environment is to provide for commercial and industrial uses in the shoreline district where water access is limited.

POLICIES

SA P65 Allow commercial and industrial uses that are not water dependent or water related.

SA P66 Require visual public access where feasible.

Urban Harborfront (UH) Environment

GOAL

SA G34 The purpose of the Urban Harborfront Environment is to provide for water-oriented uses (uses that are water-dependent, water-related, or water-enjoyment, or a combination of such uses) of the shoreline and for a mix of uses that are water

oriented and not water oriented on lots where shoreline restoration and enhancement or public access is provided.

POLICIES

SA P67 Allow a mix of uses in recognition of this environment's roles in tourism and transportation, while ensuring a high degree of public access and recognizing the historic, environmental, and anthropogenic nature of this area.

SA P68 Allow uses that are not water oriented as part of mixed-use developments or in circumstances where they do not conflict with or limit opportunities for water-oriented uses.

SA P69 Allow uses that are not water oriented on sites where there is no direct access to the shoreline.

SA P70 Allow uses that reflect the diversity of development in the area and support adjacent retail and the tourism industry. On waterfront lots, provide public access and opportunities for large numbers of people to access and enjoy the water in the form of restaurants and water-dependent recreational activities. Allow a broader range of uses on upland lots to support the tourism industry and retail core.

SA P71 Maintain and enhance views of the water and the landforms beyond the water to augment the harborfront's pedestrian environment and status as an important waterfront destination. Encourage connections to east–west corridors and waterfront trails.

SA P72 Encourage and provide for physical public access to the water, where appropriate and feasible.

SA P73 Development should support or enhance the existing historic character of the urban harborfront while balancing the need for ecological enhancement.

Urban Industrial (UI) Environment

GOAL

SA G35 The purpose of the Urban Industrial Environment is to provide for water-dependent and water-related industrial uses on larger lots.

POLICIES

SA P74 Allow uses that are not water dependent to locate on waterfront lots in limited circumstances and in a limited square footage on a site as part of development that includes water-dependent or water-related uses, where it is demonstrated that the allowed uses will benefit water-dependent uses and where the use will not preclude future use by water-dependent uses.

SA P75 Allow uses that are not water dependent or water related where there is no direct access to the shoreline.

Urban Maritime (UM) Environment

GOAL

SA G36 The purpose of the Urban Maritime Environment is to provide for water-dependent and water-related industrial and commercial uses on smaller lots.

POLICIES

SA P76 Design public access to minimize interference with water-dependent, water-related, and industrial uses, and encourage that public access be located on street ends, parks, and other public lands.

SA P77 Allow uses that are not water dependent to locate on waterfront lots in limited circumstances and in a limited square footage on a site as part of development that includes water-dependent or water-related uses, where it is demonstrated that the allowed uses will benefit water-dependent uses and where the use will not preclude future use by water-dependent uses.

SA P78 Allow uses that are not water dependent or water related on lots where there is no direct access to the shoreline.

Urban Residential (UR) Environment

GOAL

SA G37 The purpose of the Urban Residential Environment is to provide for residential use in the shoreline district when it can be developed in a manner that protects shoreline ecological functions.

POLICIES

SA P79 Provide for single-family residential use of the shoreline in areas that are not suited for industrial and commercial use, habitat protection, or public access.

SA P80 Provide development standards that allow residential development and protect ecological functions, such as shoreline armoring standards and structure setback regulations.

SA P81 Multifamily development is not a preferred use in the shoreline district and should be limited to locations where allowed as of January 2011.

SA P82 Require public access as part of multifamily development of greater than four units.

SA P83 Provide for access, utilities, and public services to adequately serve existing and planned development.

Shorelines of Statewide Significance

DISCUSSION

In addition to the goals and policies of each shoreline environment, the following policies apply to all shorelines of statewide significance under the jurisdiction of the Shoreline Master Program, which include: Puget Sound, the Duwamish River (shorelines from the south city limits north to South Massachusetts Street on the east side and Southwest Bronson Street on the west side, and including Harbor Island and the East and West Duwamish Waterways), Lake Washington, and Union Bay to the Montlake Bridge, as illustrated in Shoreline Figure 15.

POLICIES

SA P84 Protect the ecology of natural beaches and fish migration routes, including the natural processes associated with feeder bluffs.

SA P85 Encourage and enhance shoreline recreational activities, particularly in developed parks.

SA P86 Provide for quality public access to the shoreline.

SA P87 Preserve views of Puget Sound and the landforms beyond, as well as views of Lake Washington and Union Bay.

SA P88 Preserve and enhance the resources of natural areas and fish migration routes, feeding areas, and spawning areas.

Height in the Shoreline District

POLICIES

SA P89 The thirty-five-foot height limit provided in the Shoreline Management Act shall be the standard for maximum height in the Seattle shoreline district. Exceptions in the development standards of a shoreline environment may be made consistent with the Act and with underlying zoning and special districts where

1. a greater height will decrease the impact of the development on the ecological condition,
2. a greater height will not obstruct views from public trails and viewpoints,
3. a greater height will not obstruct shoreline views from a substantial number of residences on areas adjoining the "shorelines of the state" as defined in RCW 90.58.030(1)(g) that are in Seattle and will serve a beneficial public interest, or
4. greater height is necessary for bridges, or equipment of water-dependent or water-related uses or manufacturing uses.

SA P90 Heights lower than thirty-five feet

1. shall be the standard for structures overwater, and
2. where a reduced height is warranted because of the underlying residential zone, or
3. where a reduced height is warranted because public views or the views of a substantial

number of residences on areas adjoining the “shorelines of the state” as defined in RCW 90.58.030(1)(g) that are in Seattle could be blocked.

Shoreline Master Program Process

GOAL

SA G38 Continue shoreline planning by periodically updating the inventory, goals, policies, and regulations to respond to changing priorities and conditions in Seattle’s shorelines.

POLICY

SA P91 Conduct periodic assessments of the performance of and the need for change in the Shoreline Master Program.

Community Involvement

Introduction

The City of Seattle uses community involvement to create plans, design programs, and guide city investments and policy decisions. The early and ongoing involvement of community stakeholders is an essential part of an effective, inclusive, and accessible decision-making process. It enables the City to make decisions informed by the inputs and lived experiences of residents in order to best address their needs. It provides community members with the ability to voice concerns, prioritize issues, share knowledge, and to communicate how a City action might impact or benefit their lives and community. Effective community involvement includes sharing clear information with the public and accessible forums for residents throughout the city to come together, discuss issues of importance to their communities, and connect with City staff. It also means providing meaningful opportunities to give feedback and to see how their input has shaped decisions made by the City. As

we do this work, we are committed to equitable community involvement in decision-making processes that affect community members.

Engaging all Seattle Residents Equitably

DISCUSSION

Effective community involvement is designed and carried out to reach all of Seattle's many neighborhoods, a full spectrum of all residents and cultural communities in the city, businesses large and small, and organizations that have a stake in the policies adopted to shape our future and the action taken by the City to make those policies a reality.

Many people, however, face barriers to participation in the engagement process. These barriers have prevented many communities—overwhelmingly, BIPOC and low-income communities — from accessing engagement opportunities and information that would allow them to understand, participate in, and shape the City's decision-making. Historically, the majority of the feedback received came from those with the time, resources, and familiarity with navigating the City's engagement process. Facing many barriers—lack of time due to work or family demands, language access, technological literacy, poorly explained City processes, and lack of trust between community and the City—other communities are rendered largely silent in comparison and are thus under-represented and disempowered. Equitable engagement seeks to break down these barriers.

GOAL

CI G1 City decisions shaping plans and policies, citywide and community investments, and other programs and initiatives include and reflect equitable and inclusive engagement with communities and stakeholders across the city.

POLICIES

CI 1.1 Use well-designed, responsive, and culturally relevant community involvement plans and strategies that provide opportunities for community members, organizations, businesses (including small locally owned businesses), and other key stakeholders to learn about and shape City plans and decisions.

CI 1.2 Use approaches to community involvement that reflect the needs of under-represented people and communities, including: populations at risk for displacement, Black, Indigenous, and People of Color (BIPOC), youth, elders, low-income households, people with limited-English proficiency (LEP), immigrants and refugees, LGBTQ+, people who are unhoused, people with disabilities, and other groups who have been under-represented in City decision-making processes.

CI 1.3 Increase representation, input, and involvement by members of under-represented communities, community leaders, and stakeholders in public outreach and engagement across the full range of City projects.

CI 1.4 Design decision-making processes in ways that are reflective of and accessible to affected communities.

CI 1.5 Provide clear and timely information to community about how their input can or has shaped City policies and decisions.

CI 1.6 Provide a wide range of opportunities for obtaining information and involvement in decision-making processes.

CI 1.7 Seek opportunities to do engagement in community-based settings, culturally significant and accessible spaces, and locally organized meetings.

CI 1.8 Seek to reflect the diversity of the city in the membership of city-appointed boards and commissions.

Engagement Partnerships

DISCUSSION

Community involvement can be more effective and more equitable when the City partners with organizations rooted in communities themselves. Through engagement partnerships, the City can support and empower communities to drive the engagement process from within. By tapping the ability of community leaders to effectively reach their own community members, the City will support an engagement process whose inputs will more accurately communicate the needs and priorities of its diverse communities. These partnerships also lay the groundwork for more durable and trusting relationships with historically underrepresented communities.

GOAL

CI G2 Community engagement reflects and benefits from the coordinated efforts of City, organizational, and community-based partners.

POLICIES

CI 2.1 Partner with community-based organizations, other public agencies, schools, institutions, labor and trade unions, and other organizations in designing and carrying out the community engagement process.

CI 2.2 Build relationships with community members and community-based organizations that are established through a long-term commitment to building mutual respect, trust, and community well-being.

CI 2.3 Establish partnerships with community-based organizations to engage and empower BIPOC and other underrepresented communities that historically have experienced barriers to participating in City decision making processes.

CI 2.4 Partner with impacted communities to identify and design strategies that advance a more equitable and inclusive future, reduce and repair past harms, and reduce current and future risk of displacement.

CI 2.5 Identify and partner with youth-based organizations to uplift the perspectives and inputs of this population, which will inherit the legacy of current City decision making processes.

Building Community Capacity

DISCUSSION

Equitable engagement can be more successful with investments in the capacity of communities to participate effectively in the engagement process. Capacity strengthens community members' ability to share input that is based on their collective expertise, knowledge, and lived experience as they relate to the benefits and impacts of City policies and actions. Prioritizing capacity building in historically underrepresented communities will help ensure that both the process and results of City decisions are more equitable.

GOAL

CI G3 Seattle has an equitable community engagement process that enfranchises all residents in City decision-making processes and builds the long-term capacity of communities to organize to improve their lives and neighborhoods.

POLICIES

CI 3.1 Actively support the ability of community members, particularly those of historically underrepresented communities, to develop the knowledge and skills to effectively participate in City decision-making processes.

CI 3.2 Identify opportunities to elevate community expertise, lived experience, and leadership to guide and inform engagement and planning processes.

CI 3.3 Prioritize available resources to plan for and implement equitable community involvement, including, where appropriate and feasible, compensation for time, experience, and expertise shared through the engagement process.

CI 3.4 Promote opportunities for community-based participatory research and data collection to inform and shape City plans, policies, and investments.

Indigenous Engagement

DISCUSSION

The City is committed to investing in and growing its engagement with both Tribal Nations and its Urban Indigenous population. This includes engaging and collaborating with Indigenous peoples

early and frequently when developing and implementing programs and policies. The City is also committed to working in collaboration with Indigenous people to increase Indigenous visibility and voice by prioritizing and supporting cultural practices, stewardship, and ways of knowing.

GOAL

CI G4 City of Seattle has established relationships, practices, and processes of engagement with Tribes and urban Native communities that reflect the ongoing importance of Indigenous communities to the City and its future in the region.

POLICIES

CI 4.1 Identify and incorporate Indigenous engagement methodologies and practices that will make engagement more accessible to the Indigenous community.

CI 4.2 Honor and uphold government to government relationships with federally recognized Tribes through early and frequent Tribal consultation.

CI 4.3 Ensure that Tribal sovereignty and treaty rights are recognized and respected throughout the planning process.

CI 4.4 Seek opportunities for City staff to learn directly, and with reciprocity, from Tribal and urban Native leaders about trust and treaty rights, Tribal sovereignty, Tribal governance, Native history, culture, protocols, and appropriate ways to engage with Tribes and Urban Indian Organizations.

CI 4.5 Partner with Native artists and community members to co-develop creative approaches for Indigenous representation and visibility.

CI 4.6 Support early and ongoing consultation with urban Native communities and with Tribal governments, working with these communities to learn more about the needs, strengths, and challenges of Indigenous communities with regards to City processes and plans.

CI 4.7 Utilize data, reports, and educational information generated by Indigenous communities to inform City plans, projects, and processes.

CI 4.8 Strengthen inter-departmental coordination and consistency in engagement with Tribes and urban Indigenous communities toward a more structural, systemic, citywide approach that better serves Tribal and urban Native partners.

CI 4.9 Support opportunities for Native leaders to convene with City representatives and with each other to share and celebrate their work with one another, troubleshoot solutions to common challenges, break down silos, and increase collaboration.

Glossary

TERM	DEFINITION
Accessory dwelling unit (ADU)	A housing unit that is in addition to the primary residence on a site. An accessory unit may be attached to or detached from the primary residence.
Active transportation	Forms of mobility that include walking or running; the use of a mobility assistive device such as a wheelchair; bicycling, and cycling, irrespective of the number of wheels; and the use of small personal devices such as foot scooters and skateboards. Active transportation includes both traditional and electric assist bicycles and other devices. Planning for active transportation must consider and address accommodation pursuant to the Americans with Disabilities Act and the distinct needs of each form of active transportation.
Activation	Activation refers to the design and utilization of public spaces to create vibrant and engaging environments. Through thoughtful activation strategies, public spaces can become lively gathering spots that stimulate community interaction, cultural exchange, and economic vitality. This involves organizing events, festivals, performances, and markets that celebrate diversity and local talents, attracting people from different backgrounds and fostering a sense of belonging.
Area Median Income (AMI)	The annual median family income for the Seattle area, which includes King and Snohomish counties, as published by the US Department of Housing and Urban Development, with adjustments for household size.
Building performance standards	Energy or emissions targets that existing buildings must meet over time, reducing climate impacts.
Built environment	Man-made or modified structures, landscapes, and infrastructure that provide living, working, and recreational space.
Capital facilities	Capital facilities are major assets that have a long useful life such as roads, developed parks, municipal buildings, and libraries.

Capital Improvement Program (CIP)	The portion of the City's budget that describes revenue sources and expenditures for funding capital facilities over a six-year period.
Carbon neutral	Making no net release of carbon dioxide into the atmosphere. Not net increase in carbon pollution and additional carbon reduction through offsets.
Carbon pollution	Greenhouse gases, such as carbon dioxide, methane, nitrous oxide, and certain synthetic chemicals, trap some of the Earth's outgoing energy, thus retaining heat in the atmosphere. Also called carbon emissions, greenhouse gas emissions, GHG emissions and climate pollution.
Circular economy	A circular economy keeps materials, products, and services in circulation for as long possible. A circular economy reduces material use, redesigns materials, products, and services to be less resource intensive, and recaptures "waste" as a resource to manufacture new materials and products.
Clean energy	Refers to energy that is generated with zero carbon emissions. It includes renewables (solar, wind, geothermal, biomass and hydro) and non-renewables (nuclear, fusion, and biogas)..
Climate adaptation	Refers to actions taken to adapt to unavoidable impacts as a result of climate change.
Climate change	A change in global or regional climate patterns, in particular a change apparent from the mid to late twentieth century onward and attributed largely to the increased levels of atmospheric carbon dioxide produced by the use of fossil fuels.
Climate resilience	The ongoing process of anticipating, preparing for, and adapting to changes in climate and minimizing negative impacts to our natural systems, infrastructure, and communities.
Climate Pollution	See carbon pollution.
Co-benefits	The ancillary or additional benefits of policies that are implemented with a primary goal. For example, policies designed to reduce greenhouse gas emissions also have other, often at least equally important, benefits (e.g., energy savings, economic benefits, air quality benefits, public health benefits). Also referred to as "multiple benefits."

Communities of color	Communities comprised of people of color with a shared racial identity. May also have a geographic component referring to where people of color with a racial identity in common reside.
Conditional use	A use that may be located within a zone only upon taking measures to address issues that may make the use detrimental to public health, safety, and welfare, or issues that may impair the integrity and character of the zoned district.
Consumption-based emissions	Greenhouse gas emissions generated by the activity of all residents of a geographic area. It accounts for the emissions associated with all the goods and services consumed within the community, no matter where they are produced.
Countywide Planning Policies	The Growth Management Act requires that counties prepare countywide planning policies (CPPs) to provide a common framework for city and county comprehensive plans. The CPPs contain housing and job growth targets for each jurisdiction along with estimates of future affordable housing needs.
Creative economy	Includes people, organizations, and businesses who do creative and cultural labor, both paid and unpaid, including artists, designers, authors, professionals, and creative entrepreneurs who freelance or "gig."
Critical access needs	A building's curbside loading needs that must be met for the building to perform its core operating functions safely and successfully. Critical access needs are delineated as curb signage that facilitates access for vehicles and services to buildings (residential, commercial) that provide for the following: mail and package delivery; commercial and urban goods; building maintenance; solid waste servicing; passenger pickup/drop off; and on-demand delivery.
Cultural resources	Cultural resources encompass all the physical evidence of past human activity. They are non-renewable resources that are important to our nation's history as they tell the story of our human past and interaction with the natural environment. This could include a site, object, building, structure, landscape, etc.

Cultural spaces	All spaces whose primary purpose is to present or support artists and culture-makers, and their art and culture. It includes spaces for art presentation, art creation, supply for the means of creative production, arts training and education, live/work, art support organizations, and cultural heritage organizations.
Curb space	The area within public rights-of-way that are between the sidewalk and travel lanes, or where parking and loading are generally allowed.
Decarbonization	Transitioning away from fossil fuels to low-carbon or carbon-neutral alternatives. It encompasses renewable energy deployment, energy efficiency improvements, and carbon capture and storage technologies.
Deconstruction	The systematic disassembly of buildings to maximize reuse and minimize demolition waste.
Demand management	The strategy of reducing demand for services such as energy, water, or vehicle trips, rather than increasing production to ensure adequate supply.
Density	A measurement of the concentration of development on the land, often expressed in the number of people, housing units, or employees per acre.
Development regulations	Rules and regulations for new development, such as the Land Use Code, Building Code, Energy Code, Stormwater Code, etc., the City uses to control the development of land and buildings.
Development standards	Regulations in the Land Use Code that limit the size, bulk, or siting conditions of particular types of buildings or uses located within any designated zoning district. See also zoning.
Displacement	The involuntary relocation of residents, businesses, or organizations from an area. Physical displacement, or direct displacement, is the result of eviction, acquisition, rehabilitation, or demolition of property, or the expiration of covenants on rent/income-restricted housing. Economic displacement occurs when residents or businesses can no longer afford escalating costs. Cultural displacement occurs when residents, businesses, or organizations are compelled to move because the people and institutions that make up their cultural community have left or are leaving the area.

Distributed energy	Systems where the supply of water, energy, or other resources come from many sources, such as small solar energy generators or the capture of waste heat, rather than from a central source, such as a power plant. Also referred to as distributed energy resources, and distributed resources.
District energy	A highly efficient heating and cooling system using a network of underground pipes to pump steam, hot water, and/or chilled water to multiple buildings in an area such as a downtown district, college or hospital campus, airport, or military base. Providing heating and cooling from a central plant requires less fuel and displaces the need to install separate space heating and cooling and hot water systems in each building.
Electrification	Replacing technologies or processes that use fossil fuels, like internal combustion engines and gas boilers, with electrically powered equivalents, such as electric vehicles or heat pumps. These replacements are typically more efficient, reducing energy demand, and can reduce carbon emissions as electricity generation is decarbonized.
Embodied carbon	Greenhouse gas emissions arising from the manufacturing, transportation, installation, maintenance, and disposal of building materials.
Energy benchmarking	Measures of energy performance of a single building over time, relative to other similar buildings, or modeled simulations of a reference building built to a specific standard (such as an energy code).
Environmentally Critical Area (ECA)	“Environmentally Critical Areas represent those areas of Seattle that require additional regulation due to their high environmental function or unique geologic conditions such as steep slopes, landslide-prone areas, and liquefaction areas..
Environmental justice	The fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies.
Equitable development	Investments, programs, and policies that reduce disparities, prevent displacement, and meet the needs of people of color and low-income persons.

Essential public facilities	Public facilities that are typically difficult to site such as airports, state education facilities and state or regional transportation facilities, regional transit authority facilities, state and local correctional facilities, solid waste handling facilities, opioid treatment programs including both mobile and fixed-site medication units, recovery residences, harm reduction programs excluding safe injection sites, and inpatient facilities including substance use disorder treatment facilities, mental health facilities, group homes, community facilities, and secure community transition facilities.
Federally recognized Tribes	A federally recognized tribe is an American Indian or Alaska Native tribal entity that is recognized as having a government-to-government relationship with the United States. Federally recognized tribes are recognized as possessing certain inherent rights of self-government and are entitled to receive certain federal benefits, services, and protections because of their special relationship with the United States.
Food security	The ability to consistently access and afford healthy food.
Frequent transit	Frequent transit service is defined in Seattle Municipal Code 23.84A.038. It generally includes transit stops where buses come every 15 minutes during the weekday and 30 minutes during the weekend.
Frontline communities	Frontline community members are people who experience the first and worst consequences of climate change. Such residents' health and livelihoods are often highly vulnerable to climate-exacerbated hazards and economic disruptions, and their communities often lack basic support infrastructure and suffer disproportionately from the compounding impacts of pollution, discrimination, racism, and poverty.
Greenbelt	Greenbelts and Natural Areas are park sites established for the protection and stewardship of wildlife, habitat and other natural systems support functions. Some natural areas are accessible for low-impact use. Larger natural areas may have small sections developed to serve a community park function. Some Large Natural Area/Greenbelts may be divided into subareas based on vegetation, habitat, restoration status, wildlife area designation, recreation use area, etc. to better differentiate resource needs and use priorities.
Green infrastructure	Green infrastructure refers to the range of measures that use plant or soil systems, permeable pavement or other

	permeable surfaces or substrates, stormwater harvest and reuse, or landscaping to store, infiltrate, or evapotranspirate stormwater and reduce flows to sewer systems or to surface waters. Green infrastructure filters and absorbs stormwater where it falls. Also referred to as green stormwater infrastructure and natural drainage system.
Growth Management Act (GMA)	The Growth Management Act (Chapter 36.70A RCW) is a series of state statutes, first adopted in 1990, that require fast-growing cities and counties to develop a comprehensive plan to manage their population growth. State law (RCW 36.70A) that requires local governments to prepare comprehensive plans (including land use, transportation, housing, capital facilities and utilities) to accommodate 20 years of expected growth.
High-capacity transit	In Seattle, high-capacity transit consists of both rail and rubber-tired transit modes that can operate in exclusive rights-of-way or in mixed traffic. It can include technologies such as light rail or bus rapid transit.
Impact fees	One-time charges assessed by a local government against a new development project to help pay for new or expanded public capital facilities that will directly address the increased demand for services created by that development.
Impervious surface	A surface that cannot absorb water, such as asphalt or concrete.
Industrial land use	Activities that include production, distribution, and repair of goods; includes uses such as factories, container terminals, rail yards, warehouses, and repair of heavy equipment.
Land Use Code	The portion of the Seattle Municipal Code that contains regulations governing development activities. The Land Use Code describes the processes and standards that apply for each zone in the city.
Landmark	A property that has been designated by the City as an important resource to the community, city, state, or nation. Designated landmark properties in Seattle include individual buildings and structures, vessels, landscapes and parks, and objects such as street clocks and sculptures. The Seattle Landmarks Preservation Board is responsible for determining which properties meet the standards for landmark designation.

Liquefaction	The transformation of loose, wet soil from a solid to a liquid state, often as a result of ground shaking during an earthquake.
Living wage job	A job that provides approximate income needed to meet a family's basic needs.
Livability	Livability is the sum of the factors that add up to a community's quality of life, including built and natural environments, economic prosperity, social stability and equity, educational opportunity, and cultural, entertainment, and recreational possibilities.
Marginalized communities	Populations sharing a particular characteristic, as well as geographic communities, that have been systematically denied a full opportunity to participate in aspects of economic, social, and civic life such as Black, Latino, and Indigenous and Native American persons, Asian Americans and Pacific Islanders and other persons of color; members of religious minorities; lesbian, gay, bisexual, transgender, and queer (LGBTQ+) persons; persons with disabilities; and persons otherwise adversely affected by persistent poverty or inequality.
Master plan	A document that describes the long-term expectations for growth on a large property controlled by a single entity, such as the campus of a college or hospital.
Micromobility	Small, low-speed transportation devices. They are convenient for travelling short distances or the beginning or end of trips. They include bikes and scooters.
Mixed-use	Development that contains residential use plus some other, usually commercial use, such as office or retail.
Neighborhood delivery hub	Defined as a central drop-off / pick-up location for goods, creating closer proximity to the final and smaller service delivery areas. By distributing operations close to the end customer in city centers and offering additional services onsite, these hubs can alleviate congestion, reduce emissions, consolidate freight vehicle trips, reduce vehicle miles traveled, and enable transfers to low- or zero-emissions fleet for final mile deliveries.
Nonconforming use	A use or structure that was valid when brought into existence but that does not meet subsequent regulations. Typically,

	nonconforming uses are permitted to continue, subject to certain restrictions.
Open space	Any public or private parcel or area of land that is essentially unimproved and devoted to the preservation of natural resources, the managed production of resources, or outdoor recreation.
People of Color	Persons whose race and ethnicity is other than white alone, non-Hispanic. Also referred to as Black Indigenous People of color (BIPOC).
Place-keeping	Place-keeping is a multi-faceted approach to the planning, design, and management of public spaces. Place-keeping (or as some call it, place-making) capitalizes on a local community's assets, inspiration, and potential, with the intention of creating public spaces that promote people's health, happiness, and well-being.
Place-making	A people-centered approach to the planning, design, and management of public spaces such as parks, plazas, and streets that helps give activity and identity to those spaces.
Right-of-Way	A strip of land used for certain transportation and/or public use facilities, like roads, railroads, and utility lines. This term is primarily used to describe public rights-of-way, which include our streets, sidewalks, and planting strips and often abbreviated as ROW.
Riparian corridor	Creeks and everything located within 100 feet of a creek.
Safe System Approach	The Safe System Approach (SSA) has been embraced by the transportation community as an effective way to address and mitigate the risks inherent in our enormous and complex transportation system. It works by building and reinforcing multiple layers of protection to both prevent crashes from happening in the first place and minimize the harm caused to those involved when crashes do occur. It is a holistic and comprehensive approach that provides a guiding framework to make places safer for people. This is a shift from a conventional safety approach because it focuses on both human mistakes AND human vulnerability and designs a system with many redundancies in place to protect everyone. (USDOT)
Setback	The minimum distance required by zoning regulations to be maintained between a structure and a property line.

Shared parking	Parking spaces that may be used by more than one user, such as a parking lot that is used by a church on weekends and by commuters during the week.
Shoreline street end	Shoreline street ends are City Council designated areas for public access and occur where streets meet a shore. Our program collaborates with community partners on maintaining and improving shoreline street ends for public use.
Single-occupant vehicle	A privately operated vehicle whose only occupant is the driver.
Smart parking	A system that uses electronic signs to direct incoming drivers to available parking. Smart parking is a technology solution that uses sensors and/or cameras in combination with software to direct users to vacant parking spaces. A broad term to refer to a variety of technologies and policies that improve efficiency of curb management, typically with heavy data use, with performance pricing, to achieve certain policy outcomes.
Social equity	Fair access to livelihood, education, and resources; full participation in the political and cultural life of the community; and self-determination in meeting fundamental needs.
Stormwater	Water that falls as rain and flows across the ground. In an urban area, most stormwater is directed to drains that collect the water and eventually direct it to streams, lakes, or other large water bodies.
Transportation demand management	Programs and projects that reduce single occupancy trips and improve traffic congestion by encouraging people to choose other options such as transit, ridesharing, walking, biking and telework.
Tree canopy	The layer of leaves, branches, and stems that provide tree coverage of the ground when viewed from above. See also urban forest.
Urban forest	The urban forest consists of the trees and associated understory plants existing in the city. The urban forest extends across public property, private property, and the right of way including parks and natural areas, as well as the trees along streets and in yards. See also tree canopy.

Underserved communities	Racial, cultural, and other marginalized communities and the neighborhoods where they reside that have been historically underserved by City services and capital investments. (See definition for marginalized communities.)
Vehicle miles traveled (VMT) per capita	Total annual miles of vehicle travel divided by the total population.
Vulnerable Populations	Vulnerable populations are groups that are more likely to be at higher risk for poor health outcomes in response to environmental harms or climate change, due to: adverse socioeconomic factors such as unemployment, high housing and transportation costs relative to income, limited access to nutritious food and adequate health care, linguistic isolation, and other factors that negatively affect health outcomes and increase vulnerability to the effects of environmental harms; and, sensitivity factors, such as low birth weight and higher rates of hospitalization. Vulnerable populations include, but are not limited to: racial and ethnic minorities; low-income populations; and, populations disproportionately impacted by environmental harms or climate change.
Zoning, Zones	Designations adopted by City ordinance and applied to areas of land to specify allowable uses for property and size restrictions for buildings within these areas.

Mayor Harrell's
ONE SEATTLE PLAN
COMPREHENSIVE PLAN UPDATE

Appendices

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Appendix 1 Transportation

The Transportation Appendix includes technical information about the transportation system and its future needs. This information includes:

- Inventories of existing transportation infrastructure and facilities
- Planned future transportation investments
- Measures of multimodal levels of service
- Data related to transportation modeling, including land use assumptions
- Multiyear financing planning and assumptions

Existing and Planned Transportation Facilities

Seattle's transportation network comprises an array of facilities that support different modes of travel. The existing infrastructure includes roadways, transit (bus and rail), bicycle lanes and trails, pedestrian infrastructure, freight assets, airports, ferry terminals, and passenger and commuter rail lines. This section also includes a discussion of various transportation programs.

Maps included in this appendix illustrate existing and planned transportation facilities across Seattle. These visual representations offer an overview of existing facilities and planned and prioritized projects and improvements over the next 20 years. More detailed information on specific plans, timelines, and implementation strategies is included in the Seattle Transportation Plan.

Roadways

Seattle's street network consists of approximately 1,548 miles of arterials, including designated state routes, and more than 2,396 miles of non-arterials (see Figure A-1). The arterial system includes approximately 620 miles of principal arterials, 566 miles of minor arterials, and 348 miles of collector arterials.

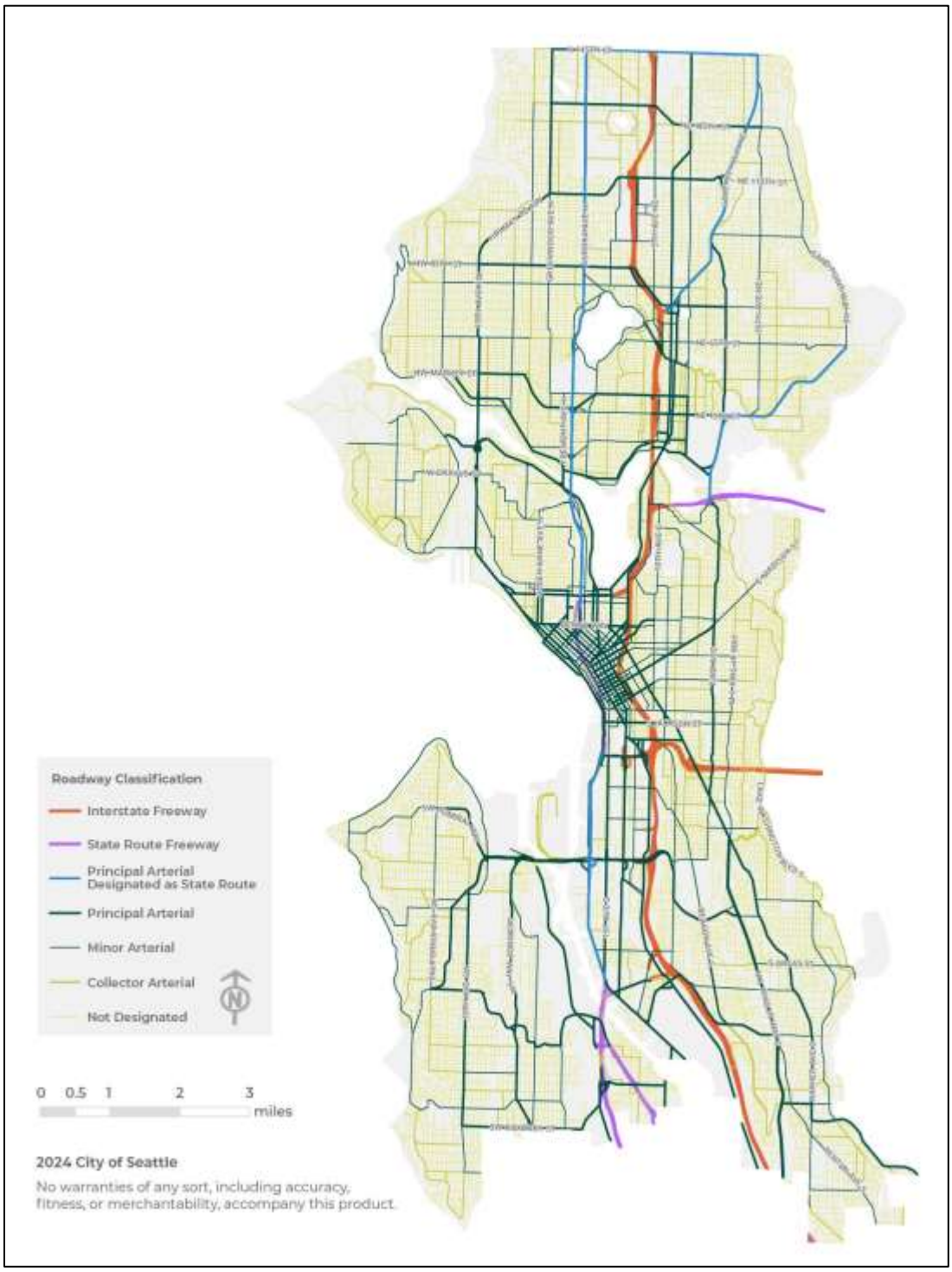
Seattle also has a network of transit lanes which are travel lanes in the street that can only be used by transit, such as bus and streetcar. Seattle has three types of transit lanes:

- Time-restricted bus-only lanes

- All-day bus-only lanes
- Dedicated transit corridors

As Seattle grows over the next 20 years, the City will make the best use of its streets and roadways by continuing to build out a multimodal system that offers diverse travel options and maintaining a network of reliable streets for driving. This strategy focuses on maintaining and modernizing our streets and roadway network for safety, equity, sustainability, livability, mobility and economic vitality. With little to no room to expand the roadway network, the City does not have any plans to build any new major roadways.

Figure A-1
Existing Roadways



Transit

BUS

Public bus service in Seattle is primarily provided by two agencies. King County Metro operates bus transit services that cover most of King County. Sound Transit provides express bus services to Seattle from elsewhere in King County, as well as from Snohomish and Pierce Counties. Sound Transit is expanding their transit service with bus-rapid transit (BRT). A more limited role is played by Community Transit, which provides several commuter bus routes to Seattle from Snohomish County. (See Figure A-2 for existing bus routes in Seattle.)

As a component of the bus network, King County Metro operates RapidRide bus rapid transit (BRT) routes in Seattle and surrounding areas. In Seattle, five routes—lines C, D, E, G, H—are currently in service and one route—line J—is under construction. In addition, Sound Transit is developing its Stride bus rapid transit service. One line in Seattle is currently under construction. (See Figure A-3 for existing and planned BRT routes.)

King County Metro, in partnership with Solid Ground, a local non-profit, also provides accessible service to riders with disabilities across the entire transit system. For anyone whose disability prevents them from riding traditional buses and trains, Metro's Access Transportation program operates a network of accessible vans.

Solid Ground also partners with the Seattle Department of Transportation to provide the Downtown Circulator Bus service. The 7-stop circulator route provides free rides for people living on low incomes and those who access health and human services in downtown Seattle.

Metro Flex, an on-demand neighborhood transit service, is available in two areas in Seattle: Delridge/South Park and Othello/Rainier Beach. Minivans pick up and drop off passengers anywhere within the neighborhood service area for access to transit hubs, essential services, shopping, and more for the same price as a bus fare. Metro Flex is provided by King County Metro in partnership with a private mobility provider.

Figure A-2
Existing Bus Routes

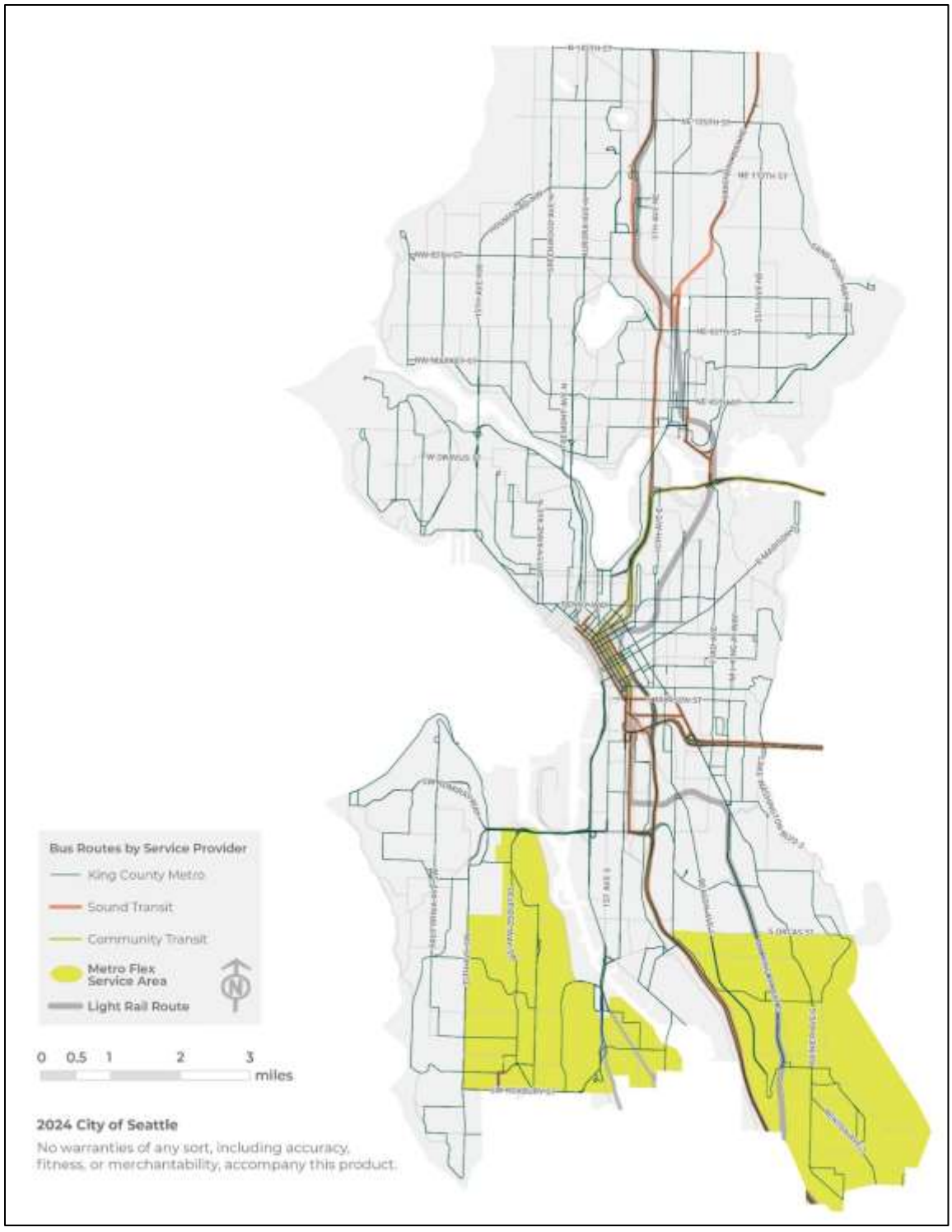
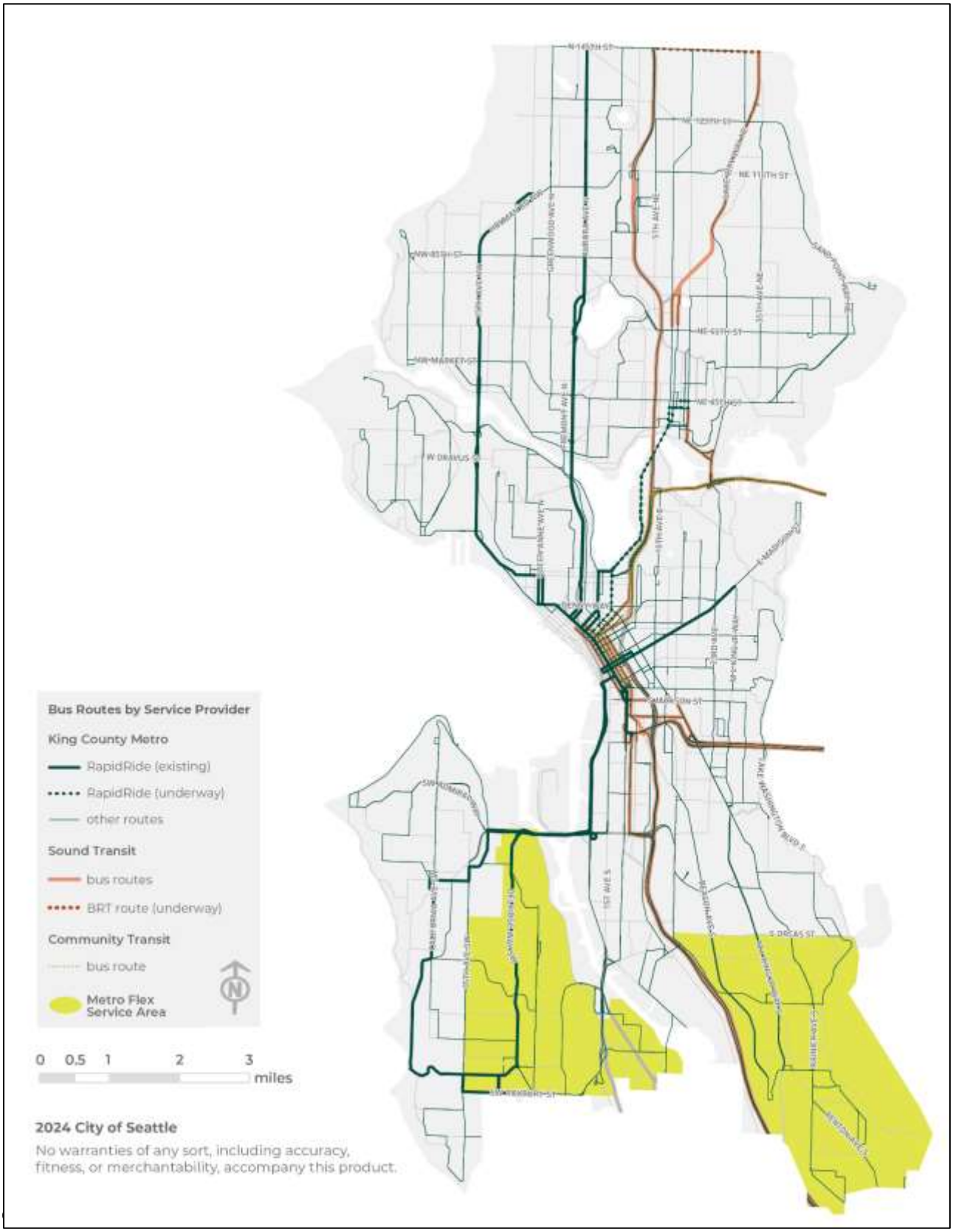


Figure A-3
Existing and Planned BRT Routes



As of 2024, King County Metro serves a population of more than 2.2 million people in a regional service area greater than 2,100 square miles. It operates more than 1,800 vehicles on about 214 bus, trolley, and dial-a-ride routes. Included are 159 electric trolley buses serving fourteen routes along almost seventy miles of two-direction overhead wires, all of which are within Seattle. At its peak in 2019, ridership was more than 123 million passengers.

As 2024, bus ridership in Seattle has steadily rebounded from pre-pandemic ridership. In Fall 2019, Seattle had on average about 312,000 daily boardings. Ridership declined during the pandemic. As of Fall 2023, ridership had rebounded to about 188,500 boardings. As of Spring 2024, average daily boardings has increased to 195,200.

The Frequent Transit Network (FTN) map (see Figure A-4*)* represents the Seattle Transportation Plan's vision for various levels of bus transit frequency out to the year 2031.[1] Over the next 20 years, adjustments to the FTN will occur on a regular cycle in partnership with King County Metro. Towards that future vision of frequent bus service, the City will continually measure progress towards a desired corridor-based frequency.

For the purposes of planning for capital investments that support transit, corridors are divided into 3 tiers, each with a different role in the transit network (see Figure A-5). The three tiers indicate the importance of and opportunity for capital improvements, particularly transit priority treatments such as bus lanes, queue jumps, Transit Signal Priority (TSP) and improvements for passengers accessing and waiting for transit.

Priority Transit Corridor Classifications Designation Description:

- Tier 1: Premium Transit Corridor. Highest-level arterial transit need, continuous transit priority, potential future light rail corridor. Examples: Third Ave, 15th Ave NE (U District), Rainier Ave S
- Tier 2: High-Priority Bus Corridor. Merits corridor-level investment programming, significant transit priority need. Examples: NE 65th St, 23rd Ave, California Way SW
- Tier 3: Priority Bus Corridor. Incremental or spot-location transit priority as per Transit Performance Policy. Examples: Sand Point Way NE, Boren Ave, 15th Ave S

[1] The FTN differs from the frequent transit routes used in the Growth Strategy and Zoning Proposal in that it is based on a future vision, whereas the frequent transit routes used to select sites near frequent transit is based on existing service level defined as: *King County Metro, Sound Transit, and Community Transit bus routes within the City of Seattle as of September 2024, and future routes approved by King County Council in March 2024 as part of the* Lynnwood Link Connections *Ordinance, that qualify as Frequent Transit Route as defined by SMC 23.54.015 and 23.84A ("Transit route, frequent").*

Figure A-4
Frequent Transit Network Targets

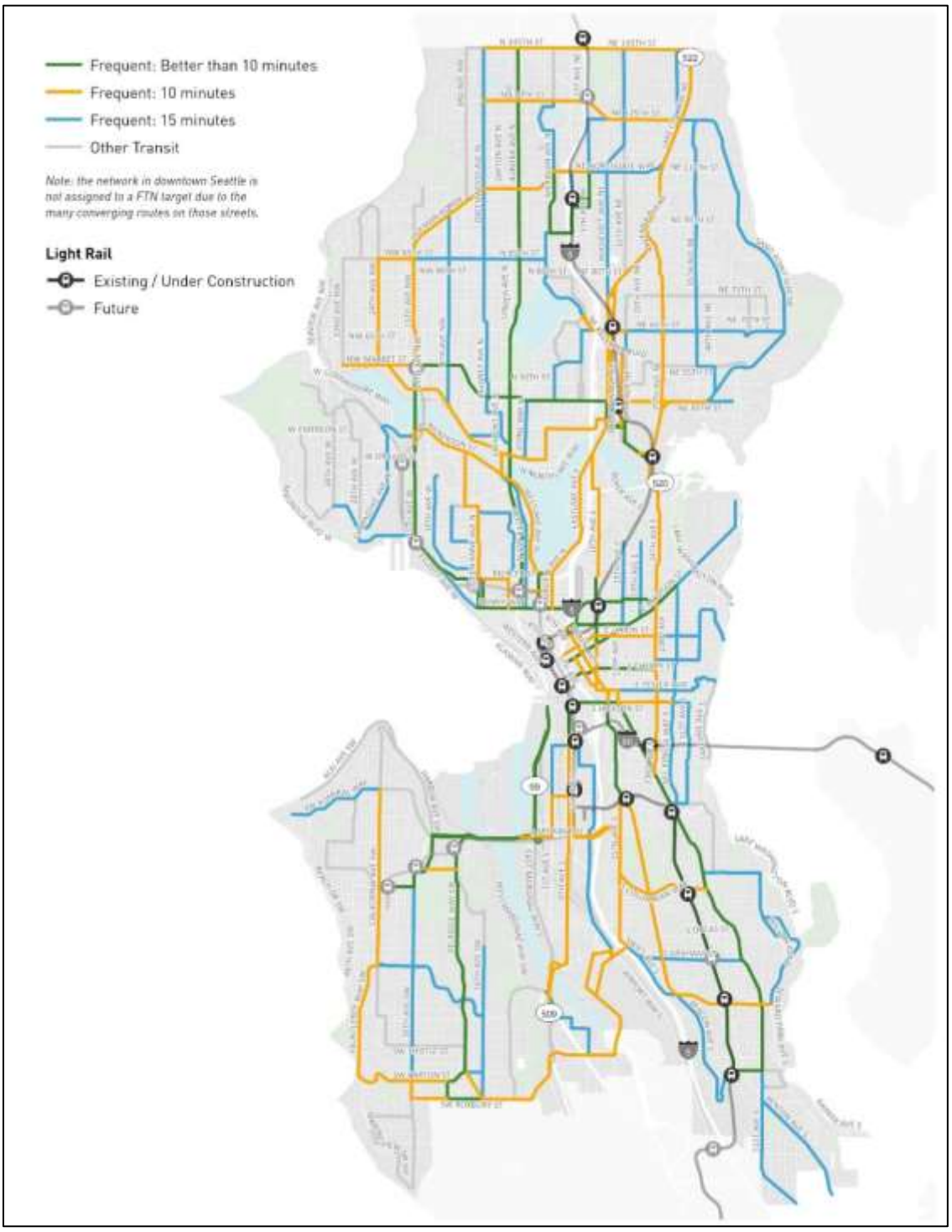


Figure A-5
Transit Capital Investment Corridors

LIGHT RAIL

Sound Transit is the regional transit authority for the Puget Sound region, with a service area that includes portions of King, Snohomish, and Pierce Counties. Sound Transit currently operates light rail service, Link 1 Line, between Lynnwood and Angle Lake, including 15 stations in Seattle. Additional infill stations will open on Link 1 in 2026 (NE 130th St.) and 2031 (Graham St.).

In the coming years, Sound Transit will substantially expand light rail service in Seattle and the region. In 2025, the East Link extension will connect Seattle to Mercer Island, Bellevue, and Downtown Redmond. The extension includes a new station in Seattle, the Judkins Park Station, at the crossing of Rainier Avenue and I-90. Planning is underway for two other extensions in Seattle. The West Seattle Link extension includes four new stations and is expected to start service in 2032. The Ballard Link extension will include up to 10 new stations and is expected to start service in 2039. Other planned extensions are anticipated to reach Everett (2037-2041), Tacoma (in 2035), and Issaquah (in 2044).

The existing light rail transit network, including extensions already under construction, and future extensions of the network are shown in Figure A-6.

Figure A-6
Light Rail Network, Existing and Future

SEATTLE STREETCAR

The City of Seattle owns and funds the Seattle Streetcar, and partners with King County Metro to operate the system on the City's behalf. The Seattle Streetcar system consists of two streetcar lines: South Lake Union Streetcar (opened in 2007) and First Hill Streetcar (opened in 2016). As of 2022, riders took 1,117,000 rides on the system annually.

The South Lake Union Streetcar is 1.3 miles and services nine stops between its southern terminus at Westlake. The First Hill Streetcar connects major medical facilities, Seattle Central College, Seattle University, and a variety of neighborhoods to the King Street mobility hub, which provides connections to Sounder trains, Link light rail, and regional bus transit. The First Hill Streetcar line is 2.5 miles long. Streetcar routes are shown in Figure A-7.

MONORAIL

Seattle Center Monorail system is owned by the City of Seattle and operated by a private vendor. Its one-mile route is a fixed overhead guideway. Built in 1962 for the World's Fair, the Monorail has two stations, the Westlake Monorail Station in downtown Seattle and the Seattle Center Station. In 2019 changes to align fares and accept ORCA card payment have made the Monorail part of the local transit network. Passengers can transfer at the Westlake Station to Link light rail, local and regional bus service. The Monorail stations and route are shown in Figure A-7.

PASSENGER RAIL SERVICE TO AREAS OUTSIDE OF SEATTLE

Passenger rail services—commuter and intercity passenger trains--connect Seattle to other cities regionally, statewide, nationally, and internationally from King Street Station. Routes and stations in Seattle are shown in Figure A-7.

COMMUTER RAIL

Sound Transit operates the Sounder commuter rail service on existing rail alignments owned by BNSF Railway. The N Line connects downtown Seattle and Everett. As of fall 2024, service to four stations includes four morning and four afternoon trains. The S Line connects downtown Seattle and Lakewood. It serves nine stations with eight morning and thirteen afternoon trains. Commuters for the N Line can also use select Amtrak trains through a partnership between Sound Transit and Amtrak. In Seattle, King Street Station serves Sounder passengers.

INTERCITY PASSENGER RAIL

Amtrak provides intercity passenger train service between City-owned King Street Station in downtown Seattle to regional, national, and international destinations. The service offers three long-distance routes: the Empire Builder (daily to Spokane and Chicago), the Coast Starlight (daily to Los Angeles), and the Cascades (multiple daily trips to Portland and Vancouver, BC). Amtrak service connects Seattle to 14 cities across the state.

Both Amtrak and Sounder services have grown in recent years and hope to further expand services in the future. Amtrak will soon begin major rail yard upgrades in Seattle. A new maintenance facility and rail yard improvements will support the existing fleet of Amtrak and Sounder trains, as well as accommodate Amtrak's new state-of-the-art Airo trains coming in 2026.

WDOT released a Preliminary Service Development Plan (2024) for the Amtrak Cascades corridor to reflect the growth, operational and social changes that will inform future improvements. It is the first step in developing a comprehensive plan that will serve as a blueprint for improving the entire Amtrak Cascades corridor.

Figure A-7
Existing Passenger Rail Routes

Bicycle and E-Mobility Network

Bicycling is growing in popularity as an everyday method of commuting and completing other daily trips as well as a recreational activity. Bicycles are classified as “vehicles” in the Seattle Traffic Code and have the right to use all streets in the city except where explicitly prohibited. The bicycle and e-mobility network serves not only people riding traditional bicycles, but also people using adaptive bikes, cargo bicycles for both personal use and deliveries, trikes, scooters, skateboards, roller skates, wheelchairs or other wheeled mobility devices, and “e-mobility” devices, which refers to personal and shared electric-powered bicycles, scooters, and other electric-powered devices. Bicycles and e-mobility serve a variety of trip purposes, such as getting to work, school, transit, the gym or doctor's office, recreating, making urban goods deliveries, and more.

Bicycle racks are provided in neighborhood commercial areas and Downtown and other appropriate locations, and some workplaces provide secure, weather-protected bike parking, showers, and lockers. As of 2024, the City has over 3,500 bike racks across the city. Seattle’s Land Use Code also requires that many new developments include bike parking to complement car parking.

As of 2024, Seattle has over 155 miles of bicycle facilities, including neighborhood greenways, protected bike lanes, in-street separations, sharrows, climbing lanes, and multi-use trails (see Figure A-8). The Seattle Transportation Plan includes further expansion of the network to increase connectivity, completeness, and safety. Figure A-9 shows the future bicycle and e-mobility network. This is the long-range vision for a connected all-ages and abilities (AAA) network that would put 100 percent of Seattle households within a quarter mile of a AAA bikeway or multi-use trail.

The “Bike+” network consists of bikeways suitable for people of all ages and abilities (AAA), including protected bike lanes, Neighborhood Greenways, Healthy Streets, and bike lanes where vehicle speeds and volumes are sufficiently low. The network aims to upgrade existing bikeways to meet national AAA guidelines while also adding new connections to create a comprehensive cycling infrastructure throughout the city.

The bicycle and e-mobility network combines the Bike+ network with multi-use trails and is designed to accommodate increasing number and variety of mobility devices, from e-scooters and e-bikes to e-cargo bikes and other emerging mobility devices. For more details, please refer to the Bicycle Element of the Seattle Transportation Plan.

BICYCLE AND SCOOTER SHARE

Seattle's bicycle and scooter share system offers electric-assist bicycles and e-scooters. The program strives to provide flexible "last mile" transportation options for Seattle residents and visitors. The City’s bicycle and scooter share program is currently in partnership with Lime and Bird to provide emission-free transportation throughout the city, including travel to and from transit stops, daily errands, and rides to and from major events. Riders can quickly locate and rent available devices using their phones, then ride to their destination and park responsibly for the following user. In 2023, there were 4.9 million rides, averaging 13,000 per day. Trips in 2024 are increasing over trips from 2023 by 3.4%.

Figure A-8
Existing Bicycle and E-Mobility Network (2024)

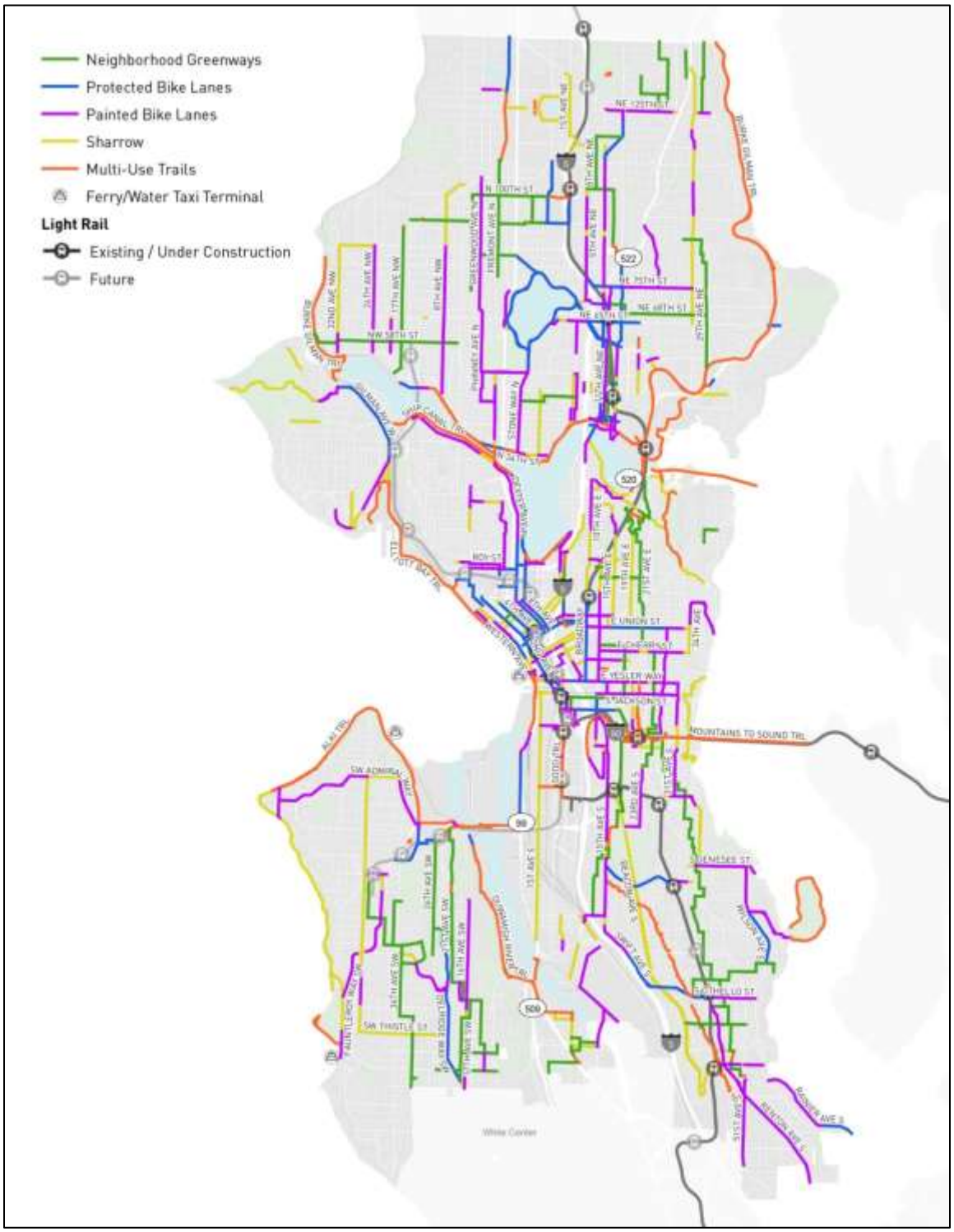
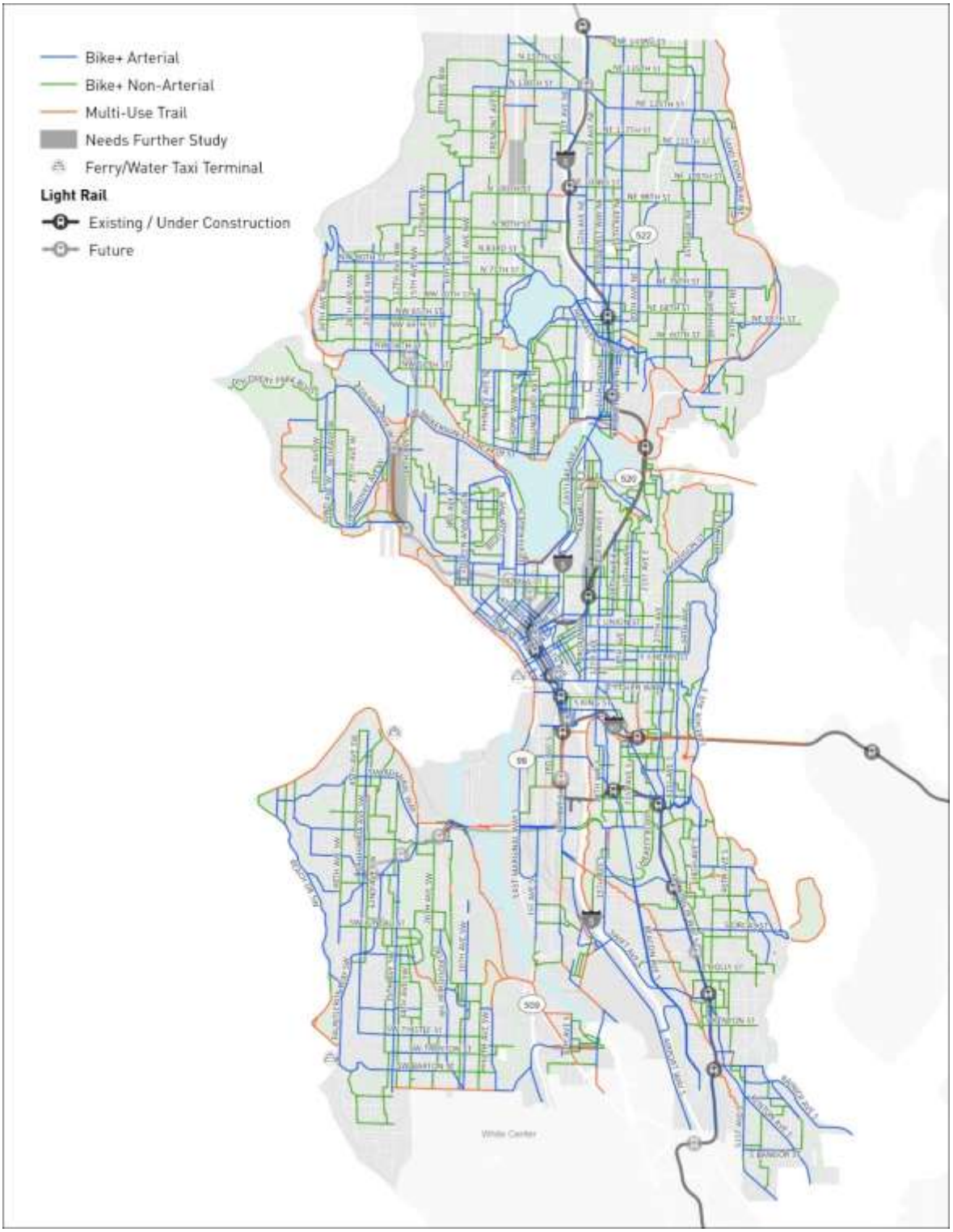


Figure A-9
Future Bicycle and E-Mobility Network



Pedestrians

As of 2024, Seattle has more than 2,285 miles of sidewalks, over 6,200 crosswalks, 34,100 curb ramps, over 500 stairways, and thirty-nine lane miles of at least twelve-foot wide trails (see Figure A-10).

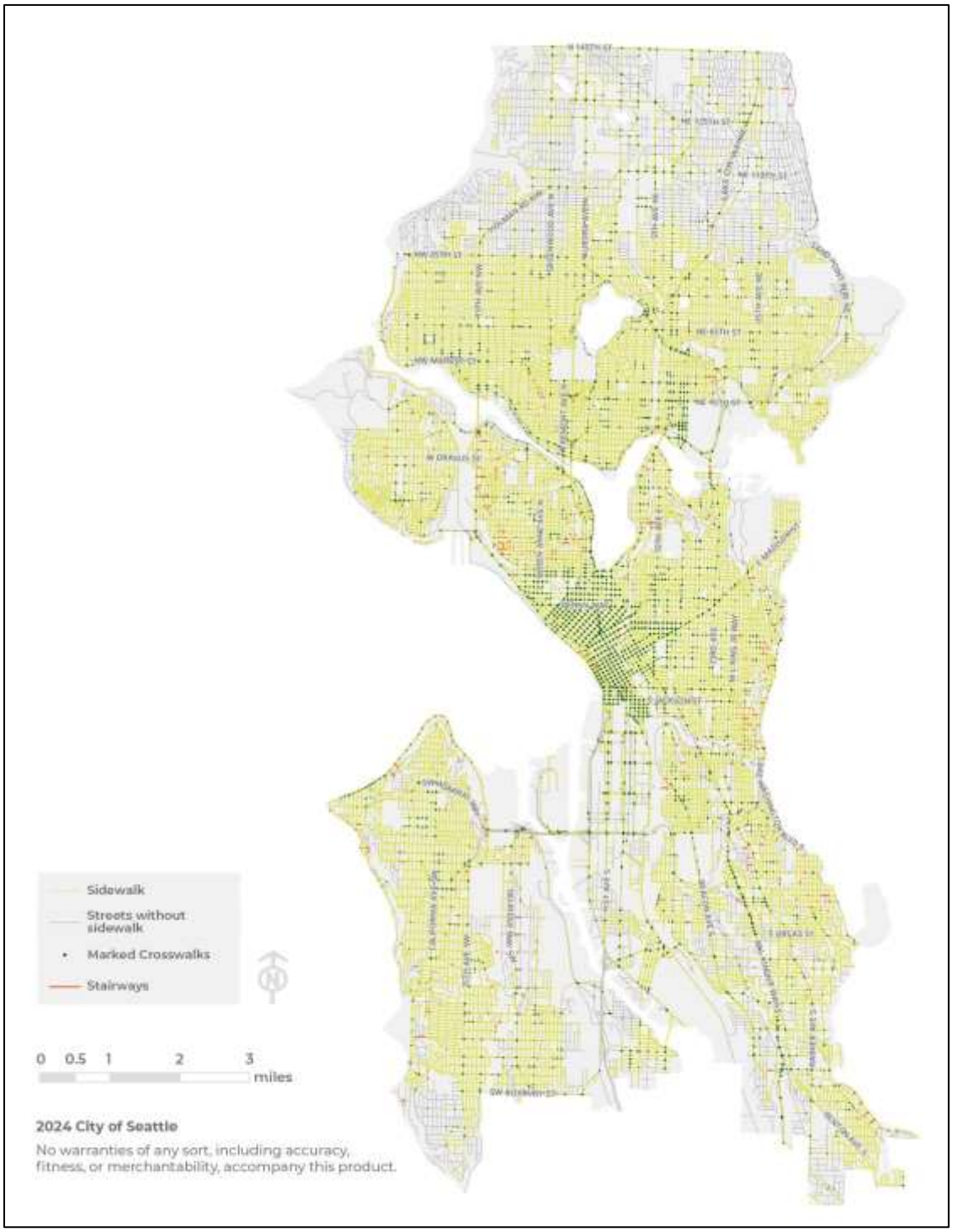
Over the past decade, the City has made progress in addressing gaps in sidewalk coverage. The City has built sidewalks or asphalt walkways in numerous locations where they were lacking. Between 2016 and 2024, approximately 250 blocks of new sidewalk were built citywide.

Seattle aims to make all streets walkable, but this goal faces challenges. It requires significant funding and will take longer than a 20-year timeframe. To address this, the city is looking to prioritize its investments, focusing on a select set of streets and projects that offer the most equitable benefits.

Planned pedestrian infrastructure improvements include new sidewalks on block faces where there are currently no sidewalks; upgrading sub-standard facilities; and enhancing street crossings for increase safety and access. These improvements may also include Corridor Network Projects and Catalyst Projects, dependent on available funding. Corridor Network Projects focus on improving access to transit with sidewalk upgrades, crossings, and amenities, while also enhancing people-prioritized streets in neighborhoods. Catalyst Projects address major connectivity barriers, like the proposed I-5 Lid and improvements to Aurora Ave and Lake City Way. These large-scale initiatives aim to transform pedestrian mobility citywide, often requiring significant investment and coordination among various stakeholders, including state and federal agencies.

For more details on the future improvements to the pedestrian network, see the Seattle Transportation Plan, Part II, Pedestrian Element, pages P-24 – P-46.

Figure A-10
Pedestrian Infrastructure



Freight Facilities

Freight-related facilities span from the commercial truck network to port facilities to shipyards to air and rail infrastructure and other related facilities. Figure A-11 shows the combined general set of freight assets in Seattle. Each component of the freight network will be described in more detail in the sections that follow.

Seattle's Freight Network is a system of designated routes designed to efficiently move goods by commercial truck transport while considering the needs of other road users and local communities. It connects major industrial areas, the Port of Seattle, rail yards, and regional highways using wider arterial streets built for larger vehicles. The network features over-legal routes for oversized loads, restricted streets, time-of-day limitations, weight-restricted bridges, and clear signage to guide drivers.

Managed by the Seattle Department of Transportation, the network aims to balance freight mobility with safety and neighborhood impact concerns. It directs truck traffic away from residential areas where possible while maintaining access to commercial and industrial zones. Key corridors include parts of Aurora Avenue, East Marginal Way, and the Duwamish industrial area. The city regularly evaluates and updates the network to address evolving needs and improve overall efficiency. Figure A-12 represents the Freight Network in Seattle.

OVER-LEGAL ROUTES AND HEAVY HAUL NETWORK

To support large commercial trucks, Seattle also has specific routes for oversized and overweight trucks, referred to as “over-legal.” Permits are required to operate over-legal vehicles on designated streets. These routes can accommodate trucks with larger loads that require a 20-foot by 20-foot envelope, though specific segments of the network may not handle both excess width and height dimensions. The Heavy Haul Network (HHN) is located in the Duwamish MIC. The network provides key routes for commercial trucks moving heavy, divisible loads. These trucks typically make short trips from the Port to the transload facilities. The HHN helps manage freight flow around the ports and improve movement of large commercial trucks hauling heavy divisible cargo. Figure A-12 shows the Over-legal Routes and the Heavy Haul Network.

Figure A-11
Freight Assets

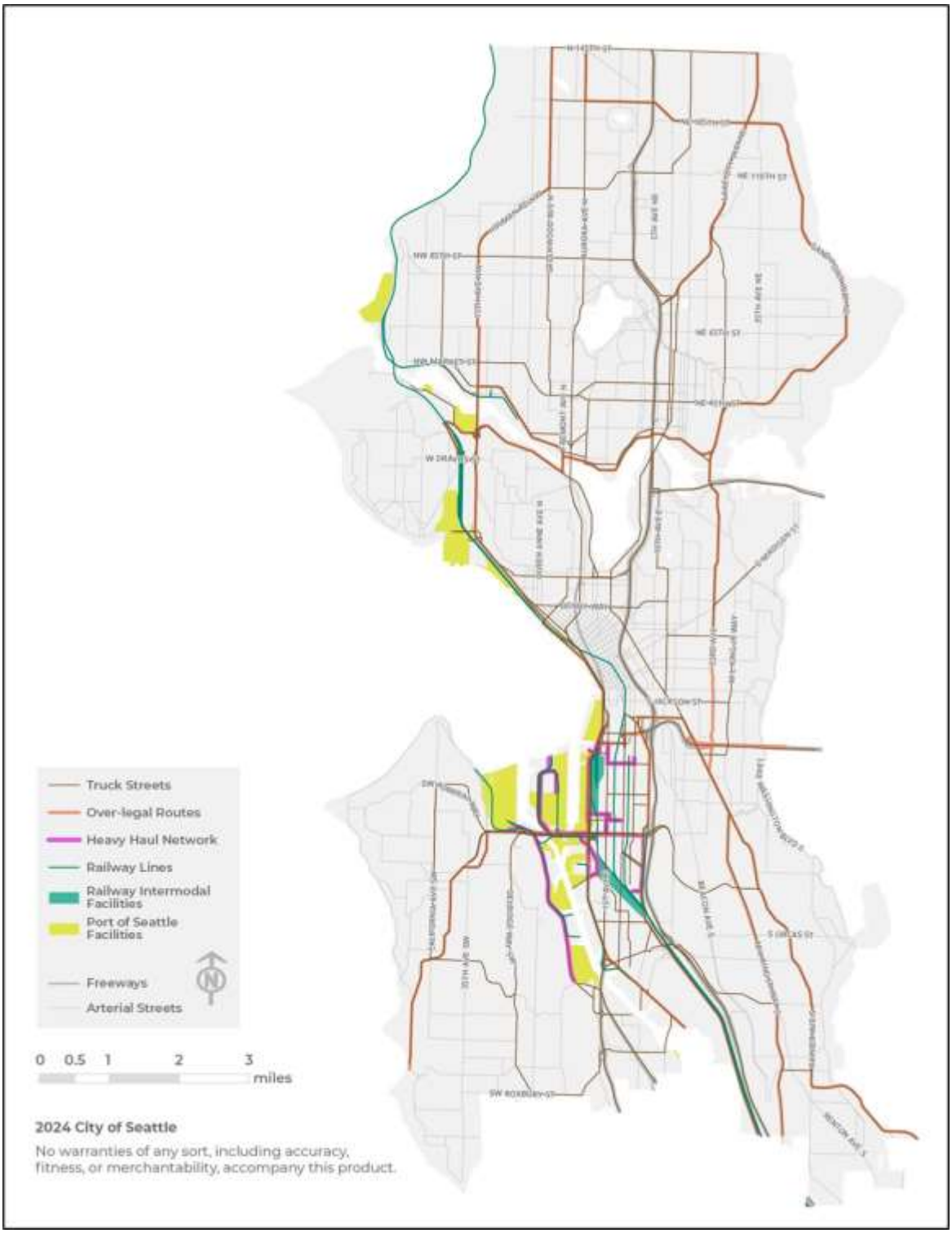
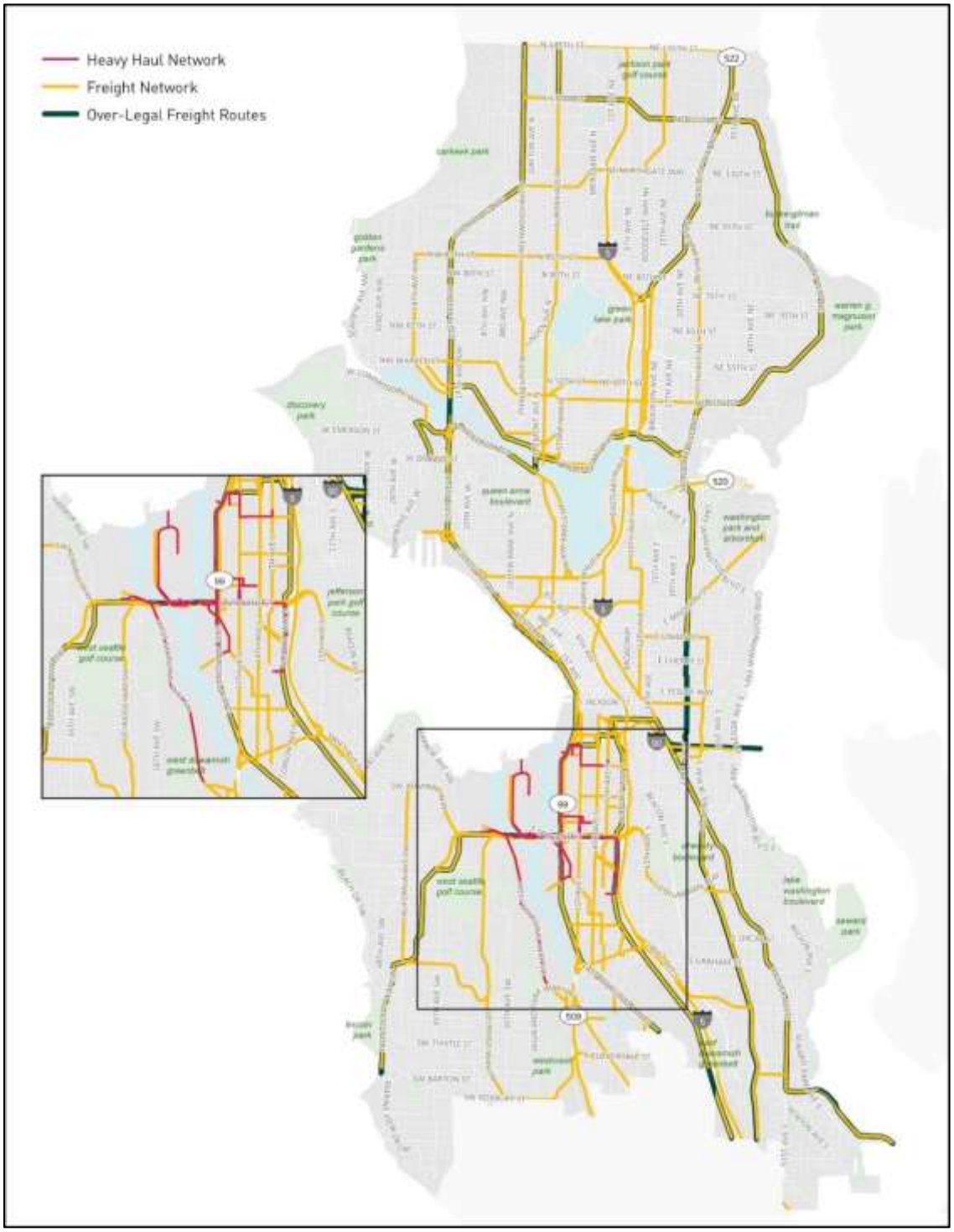


Figure A-12
Freight Network, including the Heavy Haul Network and Over-Legal Routes



FREIGHT RAIL

Two main components of our rail network handle freight. BNSF Railway Company (BNSF) owns and operates mainline tracks from Portland to Seattle. They also own and operate track extending north from Downtown Seattle to the Canadian border through Snohomish County and eastward to Spokane and extending to the Great Lakes region. Union Pacific Railroad (UP) owns and operates a single mainline track with two-way train operations between Tacoma and Seattle, its northernmost terminus on the West Coast.

There are five intermodal terminals providing the Duwamish Manufacturing Industrial Center with rail service. BNSF operates the Seattle International Gateway (SIG) Yard north of South Hanford Street and provides rail service within the Terminal 5 Intermodal Yard west of Harbor Island, Terminal 18 Intermodal Yard within Harbor Island, and Terminal 115 east of West Marginal Way. UP owns and operates ARGO Yard immediately south of South Spokane Street between East Marginal Way and Airport Way South and also provides rail service at the Terminal 18 Intermodal Yard. Port of Seattle intermodal facilities within the Duwamish MIC include Terminals 5, 18, 20, 46, and 115.

The Ballard Interbay Northend Manufacturing Industrial Center (BINMIC) contains BNSF's Balmer Yard in Interbay and the Ballard Terminal Railroad in Ballard. The latter is a shortline railroad that provides rail service along its 3-mile spur track on Shilshole Avenue NW.

PORT OF SEATTLE AND OTHER INTERMODAL FACILITIES

The Port of Seattle (POS) manages 21 distinct properties that support marine, rail, and air intermodal facilities. POS facilities include 9 commercial marine terminals, 4 ocean container terminals with 31 container cranes, and a deep-draft grain terminal. Steamship operators have direct service to Asia, Europe, Latin America, and domestic markets (Alaska and Hawaii).

Services are offered by seventeen ocean carriers, about thirty tug and barge operators, and BNSF Railway and Union Pacific railroads, operating intermodal yards. Figure A-13 shows Port of Seattle facilities located in Seattle.

Figure A-13
Port of Seattle facilities located in Seattle

Air Transportation

The Seattle metropolitan area has five airports offering scheduled service to regional, national or international destinations. Figure A-14 shows the general location of two of these airports, shown in bold below, which are located within the City of Seattle.

- King County International Airport-Boeing Field (BFI), owned by King County, is located partly in Seattle and Tukwila.
- Seattle Lake Union Seaplane Base (LKE), privately owned, is located on Lake Union in Seattle.
- Seattle-Tacoma International Airport (SEA), owned by the Port of Seattle, is located in the City of SeaTac.
- Seattle Paine Field International Airport (PAE), owned by Snohomish County, is located in unincorporated Snohomish County near Mukilteo and Everett.
- Kenmore Air Harbor (KEH), privately owned, is located on Lake Washington in the city of Kenmore.

The airports located in Seattle, BFI and LKE, are generally compatible with surrounding land uses. Potential impacts of any development that may occur in proximity to the airports are mitigated for through the planning and permitting process, addressing high-intensity uses, airspace and height hazard obstruction, noise and safety issues. For both these airport locations land development is generally restricted to lower-density, lower-height uses and buildings.

BFI is located in a primarily industrial area. Noise, air pollution, and safety concerns affect residential neighborhoods adjacent to the airport. To reduce the impact on these residential areas, the airport service is restricted to primarily private and non-major commercial flight activities.

King County is currently developing a Vision 2045 Airport Plan to evaluate how BFI can evolve and adapt to meet future aviation needs and maintain its status as a world-class airport. This airport planning process will result in an airport plan that serves airport users and surrounding community members for the next 20 years. The Airport Strategic Plan will be completed by December 2024.

LKE serves commercial seaplane operators providing passenger service and private seaplane operators. Access to the facilities of seaplane operators on Lake Union are provided through the City's transportation system including roadways and transit. The seaplane facility is adjacent to the downtown area. Zoning regulations are in place limiting heights to establish a landing/approach corridor that specifically addresses the safe access needs of seaplanes.

Figure A-14
Airports within Seattle

Water Transportation

The Washington State Ferry (WSF) system operates two terminals in Seattle: the Seattle Ferry Terminal at Colman Dock in Downtown Seattle, and the Fauntleroy Terminal in West Seattle. Passenger-and-vehicle service is provided on four ferry routes.

- Colman Dock to Bainbridge Island
- Coleman Dock to Bremerton.
- Fauntleroy to Vashon Island and Southworth
- Fauntleroy to Southworth (direct service, no stop at Vashon)

Passenger-only water transportation is offered by King County Metro and Kitsap Transit. King County Metro Water Taxi service between Seattle Pier 50 and West Seattle (Seacrest Dock)

- King County Metro Water Taxi service between Seattle Pier 50 and Vashon Island
- Kitsap Transit Fast Ferry service between Seattle Pier 50 and Bremerton
- Kitsap Transit Fast Ferry service between Seattle Pier 50 and Southworth
- Kitsap Transit Fast Ferry service between Seattle Pier 50 and Kingston.

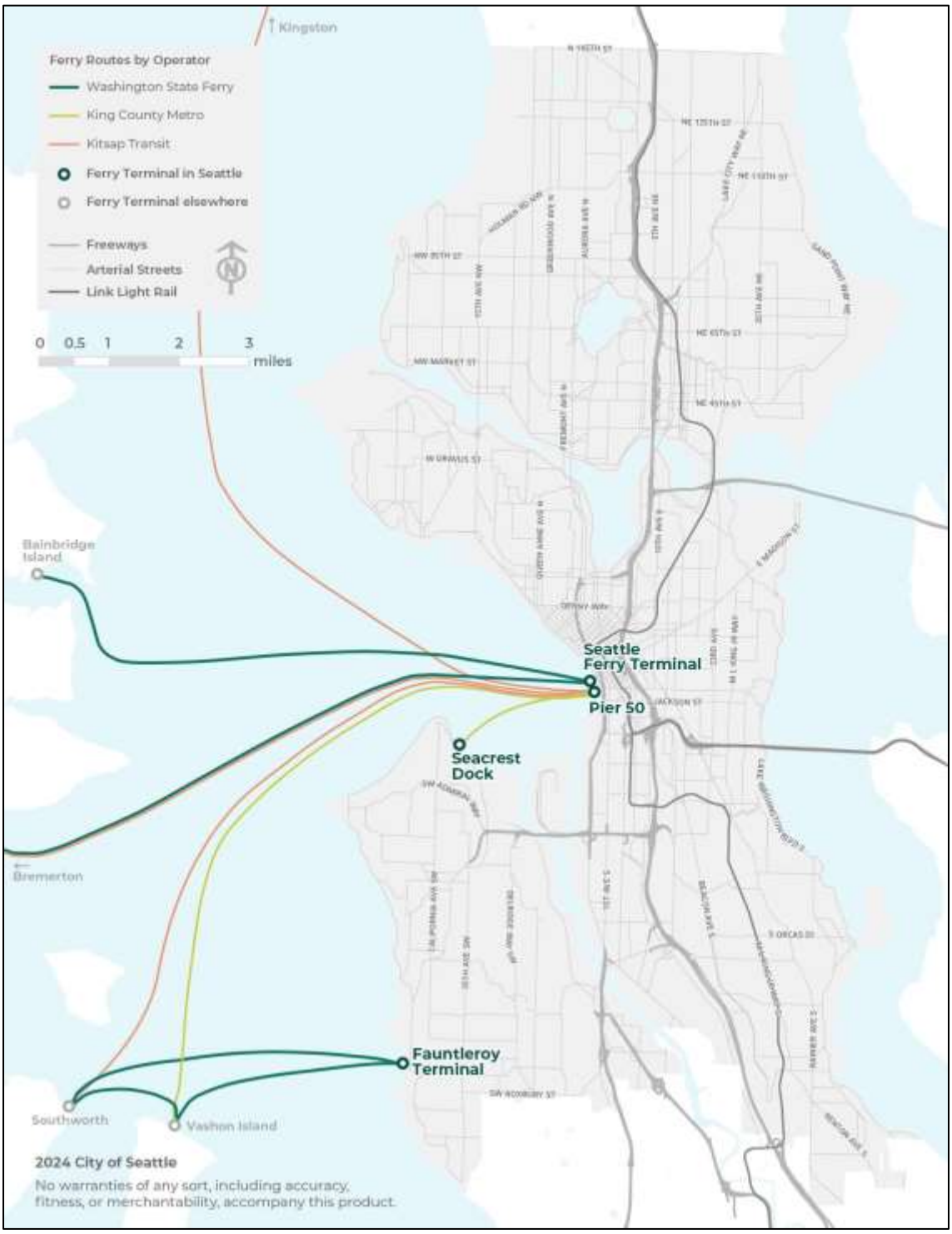
Figure A-15 shows ferry routes and terminals in Seattle.

Over the next 20 years, new passenger-only ferry routes may be added. Passenger ferry can provide fast and reliable connections in appropriate locations. Ferries serve as a supplement to the countywide transportation system in locations where it serves the network as well as, or better than, traditional fixed-route transit service. Service hours could be extended during summer and special events to accommodate rider demand.

King County Metro Long-Range Plan Metro Connects (2021) included two additional routes in their interim service network (targeted for implementation before the Ballard Link expansion) and three routes in the 2050 service network.

- Downtown Seattle to Shilshole (interim and 2050 service network)
- Kenmore to University of WA (interim and 2050 service network)
- Kirkland to University of WA (2050 service network)

Figure A-15
Existing Ferry Routes



Transportation Demand Management Strategies

The City of Seattle's Department of Transportation (SDOT) operates a comprehensive Transportation Demand Management (TDM) program to reduce single-occupancy vehicle trips and promote sustainable transportation options. This program includes initiatives such as the Commute Trip Reduction (CTR) program, which works with large employers to encourage alternative commute methods, and the Transportation Management Program (TMP), which focuses on managing transportation impacts from new developments. SDOT also supports various incentives and services, including transit pass subsidies, bike-sharing programs, and improved pedestrian and bicycle infrastructure. Additionally, the department provides resources and tools to help residents and businesses make informed transportation choices, ultimately aiming to alleviate traffic congestion, reduce emissions, and enhance overall mobility in Seattle.

Seattle has three main regulations to reduce traffic congestion and improve air quality by decreasing the number of people driving alone, particularly to commute to their place of employment, and reducing vehicle miles traveled (VMT):

- Commute Trip Reduction (CTR) Ordinance
- Transportation Management Program (TMP)
- Commuter Benefit Ordinance (CBO)

Through these programs, SDOT works with over 500 large worksites and buildings, representing more than 225,000 workers. They support impactful commuter transportation programs that include on-site amenities, subsidies, education, and communication to help workers with their transportation choices.

COMMUTE TRIP REDUCTION ORDINANCE

Seattle actively participates in Washington's Commute Trip Reduction (CTR) program, established in 1991 to reduce air pollution, traffic congestion, and energy use by promoting alternatives to driving alone. The city's local CTR program requires worksites with 100 or more full-time employees commuting during morning peak hours to conduct biennial commute surveys and submit reports on their commute programs. SDOT sets drive-alone rate (DAR) targets for the city as a whole and for individual neighborhoods.

TRANSPORTATION MANAGEMENT PROGRAMS

TMPs are used to mitigate transportation impacts identified as part of the land use and construction permitting process during a site's development review. They are triggered either through the State Environmental Policy Act (SEPA) review or Land Use Code requirements and are usually specified in the Master Use Permit.

TMPs are typically applied in three contexts:

- Individual Building Developments: Over 230 buildings in Seattle have active TMPs to mitigate transportation impacts from development; most are office or commercial buildings. More

than 70% of these sites are occupied by employers affected by the CTR and participate in that program.

- Major Institutions: Seattle has 13 major educational and medical institutions. These institutions are required to develop City Council-approved Major Institution Master Plans (MIMPs), which guide long-term development and include ongoing monitoring practices. A key component of the MIMP is the TMP, as defined in Seattle Municipal Code 23.69.030.
- Event Venues: Large venues like stadiums are usually subject to TMPs to mitigate event-related transportation impacts and ensure ongoing coordination with key city departments and transit partners.

COMMUTER BENEFIT ORDINANCE

Seattle's Commuter Benefit Ordinance requires businesses with 20 or more employees worldwide to offer their Seattle employees a pre-tax payroll deduction for transit or vanpool expenses. The ordinance applies to all employees who:

- Work an average of 10 hours per week or more.
- Include telecommuting employees and those who live outside Seattle but work in the city.

TDM EXPANSION EFFORTS AND 5-YEAR STRATEGIC PLAN

SDOT is currently drafting a TDM Programs 5-Year Strategic Plan. This plan outlines how the city's TDM programs will evolve and expand to:

- Support progress towards mode split and VMT goals in the Seattle Transportation Plan and Climate Change Response Framework.
- Better reach and support BIPOC and vulnerable communities, guided by the Transportation Equity Framework.
- Support all types of trips, beyond just commutes, and adapt to post-pandemic travel patterns.
- Develop additional capacity and partnerships for ongoing programs while being mindful of limited resources.

Compliance with Title 29 of the American Disabilities Act of 1990 (ADA)

In 2020, the Seattle Department of Transportation published their The American with Disabilities Act (ADA) Transition Plan for the Seattle Public Right-of-Way, a supplement of the City of Seattle's ADA Title II Transition Plan. SDOT prioritizes ADA accessibility improvements to the pedestrian network through multiple department programs, according to the criteria set forth in federal regulations. The SDOT Transition Plan includes a discussion and identification of physical barriers in the public right-of-way, or within SDOT-owned facilities, that limit the ADA accessibility of facilities to individuals with disabilities; describes the programs responsible and methods established to makes those facilities accessible; provides a high-level schedule to making the accessibility modifications; and identifies SDOT's ADA Coordinator as the public official responsible for implementing the transition plan.

Transportation Level of Service (LOS) Measures

Overview

As established in policies T 1.9 and T 1.10 the City will track over time several measures that collectively describe the performance of the transportation system and multiple modes of travel that comprise that system, including vehicles, transit, bicycling, and walking. The purpose and role of this suite of multimodal level of service (LOS) measures will be to assess the performance of the transportation system over time as the policies and investments included in the Comprehensive Plan are implemented. The LOS measures will also be used to indicate potential need for additional transportation investments and demand management strategies as the city grows, consistent with the growth strategy. The Washington State Legislature recently adopted HB 1181, within which are new requirements to adopt multi-modal level service standards for transportation. The measures described are designed to provide a framework for further development of LOS standards that fully implement HB 1181 before the state deadline in 2029.

Vehicular LOS

The performance of the city's roadway system, including for the movement of vehicles of all types, not just private automobiles, but also transit, freight, and other vehicular travel, is based on two measures.

The first measure is vehicle miles traveled (VMT), which will be tracked citywide. Figure A-16 shows the existing VMT along with the reduction target included in policy T 4.2. With forthcoming guidance from the State of Washington, Seattle anticipates updating our VMT target as a per capita measure. Tracking of performance will also be updated to reflect forthcoming new data from the Washington State Department of Transportation.

Figure A-16
Vehicle Miles Traveled Baseline and Target

VMT in 2018	6.2 billion
Reduction Target	37%
VMT by 2044	3.9 billion

The second LOS measure that contributes to our assessment of the city's roadways for vehicular travel is the percent of trips that are made by a single occupant vehicle (SOV trips). This measure describes the percentage of all trips that are made by single-occupant vehicle (SOV) both citywide and within subareas of the city.

The performance of the overall system, including the city's arterials, will be measured in relation to the reduced share of trips that are drive alone. Tracking SOV share will help to gauge the people-moving capacity of the city's roadways by reducing the amount of driving alone. Driving alone is the least space-efficient mode and occurs during the most congested period of the day. There are different performance levels defined for 8 geographic sectors—network areas—in the city, recognizing the diverse land use patterns and transportation contexts that exist across the city.

This SOV share measure is consistent with Seattle's comprehensive planning approach because it informs and supports strategies other than adding new capacity for general-purpose travel. Adding vehicle capacity can be costly and can lead to community disruption and environmental impacts. Generally, widening arterials may not even be practical or feasible in a mature, developed urban environment as exists in the city. This measure of LOS supports the City in using existing current street rights-of-way as efficiently as possible and encourages a broader set of travel options.

Figure A-17 shows the latest available SOV share data that will be used as a baseline for monitoring progress. In the future, goal setting and monitoring will be coordinated with Seattle's Commute Trips Reduction program (see the Transportation Demand Management Strategies section to learn more).

Figure A-17
SOV Share of All Trips

Subarea	Baseline SOV Share (2019)
Northwest Seattle	42%
Northeast Seattle	35%
Quenn Anne/Magnolia	42%
Downtown/Lake Union	24%
Capitol Hill/Central District	37%
West Seattle	41%
Duwamish	72%
Southeast Seattle	36%
Citywide	36%

Transit LOS

Transit level of service uses two measures of transit accessibility. At a citywide scale, accessibility is measured as the percent of homes within a given distance of the frequent transit network.

The Frequent Transit Network (FTN) includes high-frequency bus and light rail routes designed to provide reliable and convenient public transportation across the city. The FTN includes existing and future planned service at least every 15 minutes throughout most of the day, seven days a week, covering major corridors and connecting key destinations. Distance is measured based on a half mile walk distance from light rail and a quarter mile walk distance from bus transit and streetcar services. Figure A-18 provides baseline data for homes that are served by existing transit routes that meet this standard.

Figure A-18
Homes within ½ mile of existing and future frequent transit service (bus routes and light rail stations)

	Existing frequent transit	Future frequent transit
All Homes	391,000	391,000
Homes within ½ mile	357,000	375,000
Percent	91.3%	95.9%

Transit accessibility will also be measured for each type of center identified in the growth strategy, including Regional, Urban, and Neighborhood Centers. Figure A-19 shows whether each center is currently served by frequent transit and/or light rail, currently or planned for service within the 20-year planning period.

Figure A-19
Transit Accessibility by Centers

CENTER NAME	SERVED BY LIGHT RAIL?	SERVED BY FTN?
Regional Centers		
Downtown	Yes	Yes
First Hill/Capitol Hill	Yes	Yes
University	Yes	Yes
Northgate	Yes	Yes
South Lake Union	Planned	Yes
Uptown	Planned	Yes
Ballard	Planned	Yes

CENTER NAME	SERVED BY LIGHT RAIL?	SERVED BY FTN?
Urban Centers		
Admiral	No	Planned
Licton Springs	No	Yes
Bitter Lake	No	Yes
Central District	No	Yes
Columbia City	Yes	Yes
Crownhill	No	Yes
East Lake	No	Yes
Fremont	No	Yes
Graham	Planned	Yes
Green Lake	No	Yes
Greenwood	No	Yes
Judkins Park	Planned	Yes
Lake City	No	Yes
Madison-Miller	No	Yes
Morgan Junction	No	Yes
Mt Baker	Yes	Yes
North Beacon	Yes	Yes
Othello	Yes	Yes
Pinehurst-Haller Lake	Planned	Yes
Rainier Beach	Yes	Yes
Roosevelt	Yes	Yes
Upper Queen Anne	No	Yes

CENTER NAME	SERVED BY LIGHT RAIL?	SERVED BY FTN?
Wallingford	No	Yes
West Seattle Junction	Planned	Yes
Neighborhood Centers		
Brandon Junction	No	Yes
Bryant	No	Yes
Delridge	Planned	Yes
Dravus	Planned	Yes
Endolyne	No	Yes
Fairmount	No	Yes
Georgetown	No	Yes
High Point	No	Yes
Hillman City	No	Yes
Holden	No	Yes
Holmen Road	No	Yes
Little Brook	No	Yes
Madison Park	No	Planned
Madison Valley	No	Yes
Madrona	No	Yes
Magnolia Village	No	Planned
Maple Leaf	No	Yes
Mid Beacon Hill	No	Yes
Montlake	No	Yes
North Magnolia	No	No

CENTER NAME	SERVED BY LIGHT RAIL?	SERVED BY FTN?
Olympic Hills	No	Yes
Phinney Ridge	No	Yes
Ravenna	No	Yes
South Park	No	Yes
Tangletown	No	Yes
Upper Fauntleroy	No	Yes
Upper Fremont	No	Yes
Wedgewood	No	Yes
West Green Lake	No	Yes
Whittier	No	Yes

Bicycling LOS

In Seattle, bicycle level of service is a measure of the presence of bike lanes, trails, and other bicycling facilities within various centers of the city, based on the number of homes in proximity—access—to all ages and abilities bicycling facilities. The City aims to create a network of low-stress routes that accommodate cyclists of all ages and abilities, with a focus on implementing protected bike lanes, Neighborhood Greenways, Healthy Streets, and multi-use trails. The City aims to increase bicycle ridership, improve safety, and promote sustainable transportation options for its residents by continually working to improve access to AAA bicycling facilities.

Figure A-20 provides baseline data for the current number of homes within a ¼ mile of existing All Ages and Abilities (AAA) bicycling facilities.

Figure A-20
Homes within 1/4 mi. of All Ages and Abilities bicycling facility

All Homes	391,000
Homes within 1/4 mile	298,000
Percent	76.2%

Figure A-21 provides baseline data for access to All Ages and Abilities (AAA) bicycling facilities in different centers designations of the city.

Figure A-21
Centers served by AAA bicycling facilities

CENTER NAME	SERVED BY AAA BICYCLE FACILITY?
Regional Centers	
Downtown	Yes
First Hill/Capitol Hill	Yes
University	Yes
Northgate	Yes
South Lake Union	Yes
Uptown	Yes
Ballard	Yes
Urban Centers	
Admiral	Yes
Licton Springs	Yes
Bitter Lake	Yes
Central District	Yes
Columbia City	Yes
Crownhill	Yes
East Lake	Yes
Fremont	Yes
Graham	Yes
Green Lake	Yes
Greenwood	Yes
Judkins Park	Yes
Lake City	Yes

CENTER NAME	SERVED BY AAA BICYCLE FACILITY?
Madison-Miller	Yes
Morgan Junction	Yes
Mt Baker	Yes
North Beacon	Planned
Othello	Yes
Pinehurst	Yes
Rainier Beach	Yes
Roosevelt	Planned
Upper Queen Anne	Yes
Wallingford	Yes
West Seattle Junction	Yes
Neighborhood Centers	
Brandon Junction	Yes
Bryant	Yes
Delridge	Yes
Dravus	Planned
Endolyne	Planned
Fairmount	Yes
Georgetown	Planned
High Point	Yes
Hillman City	Planned
Holden	Yes
Holmen Road	Planned
Little Brook	Yes

CENTER NAME	SERVED BY AAA BICYCLE FACILITY?
Madison Park	Planned
Madison Valley	Planned
Madrona	planned
Magnolia Village	Planned
Maple Leaf	Yes
Mid Beacon Hill	Yes
Montlake	Yes
North Magnolia	Planned
Olympic Hills	Planned
Phinney Ridge	Planned
Ravenna	Yes
South Park	Yes
Tangletown	Planned
Upper Fauntleroy	Planned
Upper Fremont	Planned
Wedgewood	Planned
West Green Lake	Yes
Whittier	Yes

Pedestrian LOS

Pedestrian level of service is an indicator of a good walking environment. It aims to represent the walkability and accessibility in different areas the city. The presence of sidewalks is the main measure. It indicates safe and dedicated spaces for people walking.

The availability of sidewalks currently varies across different neighborhoods. The City is actively working to improve pedestrian infrastructure, with a particular focus on increasing the number of block faces that have sidewalks. This effort aims to enhance pedestrian safety, promote walking as a viable transportation option, and create more livable, connected communities. Understanding the

current sidewalk coverage and identifying gaps in the network is essential for prioritizing improvements and ensuring equitable access to pedestrian facilities across all areas of Seattle.

Figure A-22 provides a snapshot for the availability of sidewalks and the completeness of the sidewalk network in different centers designations of the city.

Figure A-22
Percent of block faces with sidewalks

	PERCENT OF BLOCK FACES THAT HAVE A SIDEWALK
CITYWIDE	75%
REGIONAL CENTERS	
Downtown	97%
First Hill/Capitol Hill	99%
University	92%
Northgate	70%
South Lake Union	96%
Uptown	98%
Ballard	98%
URBAN CENTERS	
Admiral	96%
Licton Springs	80%
Bitter Lake	47%
Central District	97%
Columbia City	92%
Crownhill	68%
East Lake	84%
Fremont	90%

	PERCENT OF BLOCK FACES THAT HAVE A SIDEWALK
Graham	64%
Green Lake	91%
Greenwood	90%
Judkins Park	98%
Lake City	54%
Madison-Miller	96%
Morgan Junction	93%
Mt Baker	73%
North Beacon	95%
Othello	87%
Pinehurst/	35%
Rainier Beach	69%
Roosevelt	94%
Upper Queen Anne	98%
Wallingford	99%
West Seattle Junction	95%
NEIGHBORHOOD CENTERS	
Brandon Junction	65%
Bryant	100%
Delridge	83%
Dravus	78%
Endolyne	80%
Fairmount	100%

	PERCENT OF BLOCK FACES THAT HAVE A SIDEWALK
Georgetown	90%
High Point	100%
Hillman City	95%
Holden	100%
Holman Road	56%
Little Brook	42%
Madison Park	98%
Madison Valley	98%
Madrona	99%
Magnolia Village	99%
Maple Leaf	100%
Mid Beacon Hill	88%
Montlake	100%
North Magnolia	98%
Olympic Hills	46%
Phinney Ridge	96%
Ravenna	98%
South Park	80%
Tangletown	100%
Upper Fauntleroy	89%
Upper Fremont	100%
Wedgewood	98%
West Green Lake	100%

	PERCENT OF BLOCK FACES THAT HAVE A SIDEWALK
Whittier	100%

Estimating Future Travel

To estimate future travel levels and system needs, modeling in the Environmental Impact Statement (EIS) for this comprehensive plan update included data and future assumptions about the amount and distribution of population, housing, and employment. Analysis also included information on existing and planned transportation facilities. Data for both baseline and future years include the number and geographic distribution of both households and employment in Seattle and the region, characteristics of households and jobs (e.g., number of residents per household, household income), and the transportation network (e.g., streets, transit routes). A computer model generated the total number of person-trips between travel zones, the number of trips that would use different modes (e.g., car, bus, bike, walk), and the vehicle traffic volumes on streets throughout the city. Data, methods, and results of this transportation analysis are detailed in the One Seattle Plan Update Final EIS.

Land Use Data and Assumptions

The EIS considered two time periods for analysis: 2019 as the baseline of existing conditions and 2044 as a 20-year horizon point in time for which the outcomes of the alternatives, including the preferred alternative, are compared. Beginning in March 2020, the COVID-19 pandemic disrupted longstanding commute patterns and broader travel trends. In the same month, the closure of the West Seattle Bridge fundamentally changed local travel patterns through a large portion of the city until the bridge's reopening in September 2022. For these reasons, 2019 was selected as a more representative year for baseline travel conditions. Selecting 2019 as the base year also provides a more conservative assumption (i.e., a baseline with more traffic congestion) with respect to identifying potential impacts of the alternatives because growth is assumed to be additive to existing conditions.

Assumptions about the amount and distribution of future growth are based on several factors. Consistent with the state Growth Management Act (GMA), the King County Growth Management Planning Council, in 2021, updated Countywide Planning Policies (CPPs), including new growth targets for local jurisdictions to use in their forthcoming comprehensive plan updates. For the 2019-2044 period, Seattle is required by the CPPs to accommodate at least 112,000 housing units and 169,500 jobs. For the 20-year planning period covered in the One Seattle Plan, the housing target has been adjusted based on more recent growth trends to a figure of 80,000 housing units for the years 2024 to 2044.

The final EIS models transportation demand for two growth alternatives. The first "not action" alternative, demand is based on the adopted growth target. In the second "preferred" alternative, demand is based on the growth strategy included in the One Seattle Plan, with significant land use changes that add housing capacity in areas across the city including capacity for middle housing in all neighborhoods and additional capacity for denser forms of housing in centers and along transit routes. Housing growth under the preferred alternative is assumed to be 120,000 new units over the 20-year planning period. As described in the Transportation element and this appendix, the transportation needs of future potential growth will be met with investments in transit, active transportation, and

strategies to use the existing assets and right of way in the city to meet the mobility needs of a growing population in a dense urban environment.

In addition, assumed future growth in housing and jobs was allocated to smaller areas across the city. Different amounts of growth were distributed to each place type in the growth strategy – including centers – and to smaller areas within each place type based on expected zoned densities. Land use assumptions for areas outside of the city are based on data provided by the Puget Sound Regional Council consistent with the Regional Growth Strategy in VISION 2050.

Traffic Volume Modeling

The City uses a modified version of PSRC's travel model to better represent street conditions such as arterial speeds, future transit routing and service levels, the distribution of trips, and choice of transportation modes. Model output include a volume to capacity ratio (v/c) that compares actual or forecasted traffic volumes with existing and future roadway capacity. These measurements are taken at selected screenlines, which are east/west or north/south corridors across which a snapshot of ridership, traffic operations, and traffic shifts/modal splits can be measured. The v/c ratios generated as part of the analysis completed for the EIS are shown in Figure A-24. The model's current and 2044 regionwide and city-limit traffic volume estimates are shown in the following tables.

A screenline methodology highlights transportation system performance citywide and between subareas of the city and region. This methodology recognizes that no single inter- section or arterial operates in isolation. Motorists have choices, and they select particular routes based on a wide variety of factors such as avoiding blocking conditions and minimizing travel times. Accordingly, this analytic methodology focuses on a "traffic-shed" where the screenlines measure groups of arterials among which drivers logically can choose to travel.

Transportation Appendix Figure A-23 is a map illustrating the location of forty-two screenlines, including screenlines that provide supplemental information about performance in and near Seattle's Regional Centers.

Figure A-23
Screenlines

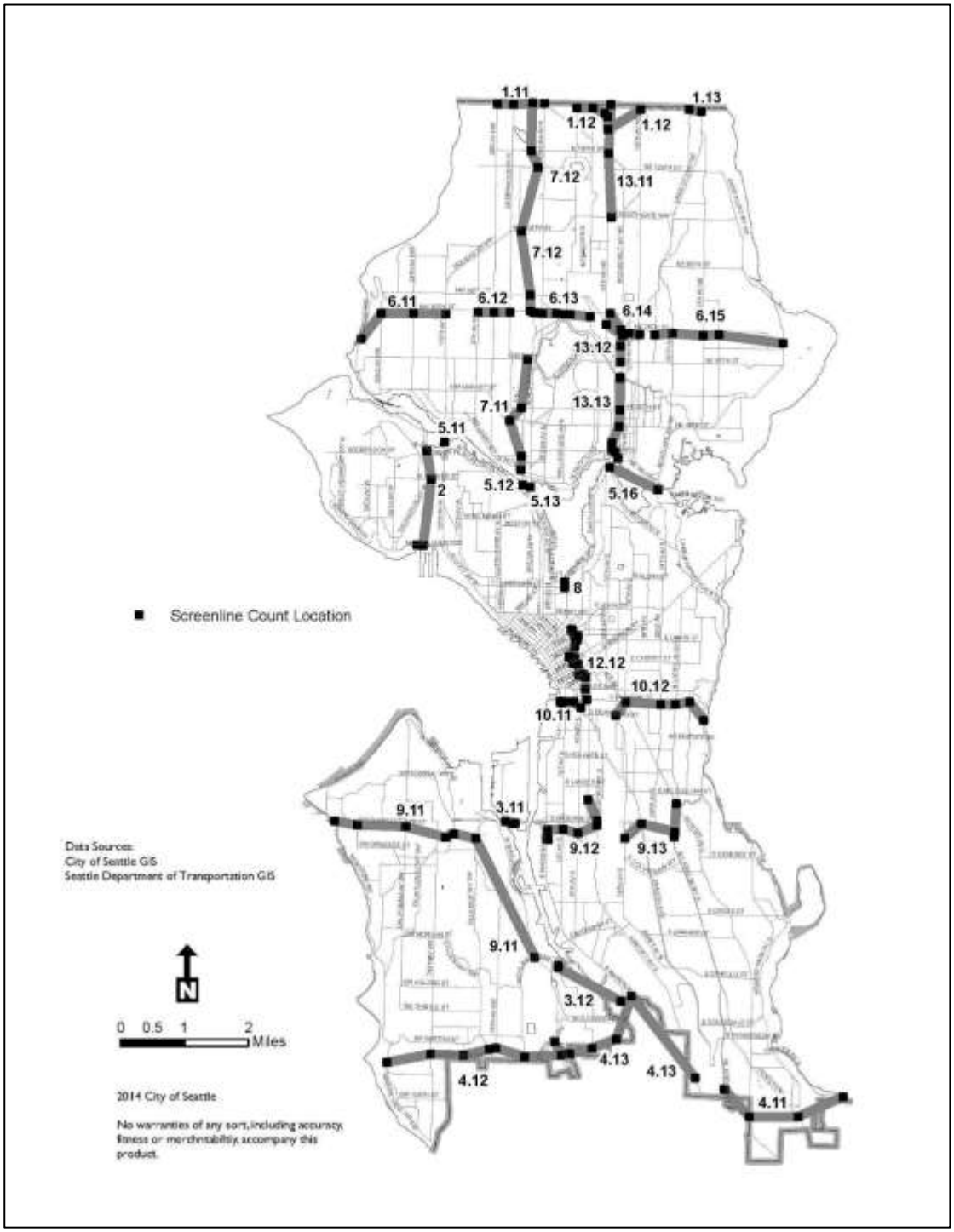


Figure A-24 lists for each screenline the current conditions and modeled traffic results for the evening peak hour in year 2044. The results are compared with analytic benchmarks, which are expressed as v/c ratios of 1.0 or 1.20, which indicates a level of use equivalent to 100 percent or 120 percent of rated roadway capacity, measured during peak commute times.

Figure A-24
Existing and modeled V/C ratios by Screenline

SCREENLINE	LOCATION	EXTENTS	2019		2044	
			NB/EB	SB/WB	NB/EB	SB/WB
1.11	North City Limit	3rd Ave NW to Aurora Ave N	0.68	0.52	0.88	0.83
1.12	North City Limit	Meridian Ave N to 15th Ave NE	0.47	0.30	0.58	0.54
1.13	North City Limit	30th Ave NE to Lake City Way NE	0.84	0.47	0.93	0.73
2	Magnolia	Magnolia Bridge to W Emerson Place	0.23	0.61	0.64	0.70
3.11	Duwamish River	West Seattle Bridge & Spokane St	0.64	0.81	0.75	0.89
3.12	Duwamish River	1st Ave S & 16th Ave S	0.56	0.87	0.69	0.88
4.11	South City Limit	Martin Luther King Jr. Way to Rainier Ave S	0.57	0.75	0.90	0.93
4.12	South City Limit	Marine Dr SW to Meyers Way S	0.37	0.42	0.51	0.53
4.13	South City Limit	SR 99 to Airport Way S	0.44	0.45	0.62	0.42
5.11	Ship Canal	Ballard Bridge	1.01	0.71	1.11	0.98
5.12	Ship Canal	Fremont Bridge	1.00	0.79	1.17	>1.20
5.13	Ship Canal	Aurora Ave Bridge	0.96	0.58	1.07	0.77

SCREENLINE	LOCATION	EXTENTS	2019		2044	
			NB/EB	SB/WB	NB/EB	SB/WB
5.16	Ship Canal	University & Montlake Bridges	0.71	0.79	0.93	>1.20
6.11	South of NW 80th St	Seaview Ave NW to 15th Ave NW	0.37	0.46	0.43	0.47
6.12	South of NW 80th St	8th Ave NW to Greenwood Ave N	0.57	0.49	0.67	0.60
6.13	South of NW 80th St	Linden Ave N to 1st Ave NE	0.54	049	0.55	0.62
6.14	South of NW 80th St	5th Ave NE to 15th Ave NE	0.71	0.56	0.77	0.82
6.15	South of NW 80th St	20th Ave NE to Sand Point Way NE	0.47	0.34	0.55	0.62
7.11	West of Aurora Ave	Fremont Pl N to N 65th S	0.53	0.65	0.69	0.70
7.12	West of Aurora Ave	N 80th St to N 145th St	0.41	0.41	0.78	0.70
8.00	South of Lake Union	Valley St to Denny Way	0.49	0.35	0.59	0.43
9.11	South of Spokane St	Beach Dr SW to W Marginal Way SW	0.45	0.71	0.58	0.92
9.12	South of Spokane St	E Marginal Way S to Airport Way S	0.51	0.54	0.72	0.51
9.13	South of Spokane St	15th Ave S to Rainier Ave S	0.56	0.57	0.79	0.73
10.11	South of S Jackson St	Alaskan Way S to 4th Ave S	0.61	0.64	0.84	0.85
10.12	South of S Jackson St	12th Ave S to Lakeside Ave S	0.52	0.64	0.78	0.84

SCREENLINE	LOCATION	EXTENTS	2019		2044	
			NB/EB	SB/WB	NB/EB	SB/WB
12.12	East of CBD	S Jackson St to Howell St	0.36	0.36	0.40	0.44
13.11	East of I-5	NE Northgate Way to NE 145th St	0.67	0.51	>1.00	0.89
13.12	East of I-5	NE 65th St to NE 80th St	0.52	0.54	0.71	0.66
13.3	East of I-5	NE Pacific St to NE Ravenna Blvd	0.59	0.52	0.77	0.72
A1	North of Seneca St	1st Ave to 6th Ave	0.47	0.50	0.67	0.70
A2	North of Blanchard	Elliott Ave to Westlake Ave	0.43	0.31	0.48	0.42
A3	East of 9th Ave	Lenora St to Pike St	0.46	0.83	0.50	0.92
A4	South of Mercer St	Elliott Ave W to Aurora Ave N	0.53	0.46	0.67	0.70
A5	East of 5th Ave N	Denny Way to Valley St	0.40	0.40	0.51	0.51
A6	North of Pine St	Melrose Ave E to 15th Ave E	0.39	0.32	0.39	0.41
A7	North of James St– E Cherry St	Boren Ave to 14th Ave	0.46	0.32	0.51	0.36
A8	West of Broadway	Yesler Way to E Roy S	0.47	0.38	0.65	0.54
A9	South of NE 45th St	7th Ave NE to Montlake Blvd NE	0.56	0.53	0.54	0.67

SCREENLINE	LOCATION	EXTENTS	2019		2044	
			NB/EB	SB/WB	NB/EB	SB/WB
A10	East of 15th Ave NE	NE 45th St to NE 52nd St	0.51	0.48	0.69	0.65
A11	South of Northgate Way (N/NE 110th St)	N Northgate Way to Roosevelt Way NE	0.44	0.46	0.59	0.71
A12	East of 1st Ave NE	NE 100th St to NE Northgate Way	0.43	0.48	0.57	0.53

State Highway Level of Service Standards

State facilities are roadways owned by the Washington State Department of Transportation (WSDOT). These facilities are also evaluated using volume-to-capacity measures and LOS benchmarks. WSDOT provides roadway capacity data for its facilities with consideration of number of lanes, presence of auxiliary lanes, and presence of ramp metering. Baseline (2019) annual average weekday traffic volumes were compiled from WSDOT's Traffic Count Database System. The results are summarized using state Level of Service (LOS) designations A-F. WSDOT sets the standard for most of its facilities in Seattle at LOS D; the exception is the segment of SR 99 between SR 509 and I-5 which has a standard of "E mitigated" meaning congestion should be mitigated when PM peak hour LOS falls below LOS E. Future year volumes were forecasted by applying the growth predicted by the PSRC regional travel demand model for each alternative to the observed counts.

Estimated Traffic Volumes on State-Owned Transportation Facilities

Figure A-25 includes, for State highways, information about existing conditions and future modeled conditions for 2044. This data is organized by "average annual daily traffic" (AADT), "average weekday daily traffic" (AWDT), and a calculation of the modeled increase in AWDT for each highway segment expressed as a percentage. AWDT represents the peak commuting periods when volumes and congestion are highest.

Forecasts are for components of State facilities including HOV lanes, express lanes, and collector-distributor lane volumes.

Figure A-25
Traffic Volumes on State Facilities

State Facility	Location	Existing Conditions Forecasted Volumes (AADT)	2044 Forecasted Volumes (AADT)
I-5	North of NE Northgate Way	215,000	230,000
I-5	Ship Canal Bridge	203,000	245,000
I-5	North of West Settle Bridge	253,000	271,000
I-5	North of Boeing Access Rd. Ramp	200,000	210,000
I-90	Mt. Baker Tunnel	148,000	166,000
SR 99	North of N Northgate Way	31,000	41,000
SR 99	Aurora Bridge	71,000	92,000
SR 99	Tunnel	39,000	46,000
SR 99	North of West Seattle Bridge	67,000	74,000
SR 99	Sough of S Cloverdale St	32,000	34,000
SR 509	1st Ave S Bridge	60,000	80,000

SR 519	S Atlantic Street west of I-90 ramps	29,000	29,000
SR 520	Lake Washington Bridge	74,000	113,000
SR 522	NE/O NE 113th St	34,000	46,000

*Note: Location indicated with road names at cross-streets that show approximate endpoints of State highway segments.

State-Funded Highway Improvements & Local Improvements to State Highways

The City of Seattle will continue to coordinate with WSDOT for consistency in plans and projects. Figure A-26 shows the known anticipated major projects for the metropolitan area, based on data available from WSDOT, that will address State highways and facilities including ferries, and an indication of project status as applicable today and/or into the future ("x" indicates project is underway). These are the primary projects within Seattle and the broader metropolitan area that will affect the functioning of segments of State highways within city limits.

Figure A-26
State Highway Project List

PROJECT	EXECTED COMPLETION
Ferry System Electrification	2040
SR 520 Portage Bay and Roanoke Lid Project	2031
I-90 Judkins Park Station - Reconnection Communities	2027
Revive I-5: Preserving a vital freeway	2020s-2030s varies/TBD
SR 900/57th Ave S to 135th Pedestrian and Safety	2027

Impacts on Adjacent Jurisdictions

Four jurisdictions are adjacent to the City of Seattle: the cities of Shoreline and Lake Forest Park along Seattle's north boundary and the city of Tukwila and unincorporated King County along Seattle's south boundary. Several major arterials that connect to streets in these jurisdictions near the Seattle borders are represented by screenline V/C ratios in table A-24. At the north city limit Screenlines 1.11 and 1.12 show impacts to the City of Shoreline and screenline 1.13 shows impacts to Lake Forrest Park. At the south city-limit, screenline 4.11 and 4.13 show impacts with Tukwila and screenline 4.12 shows impacts to unincorporated King County.

Multi-Year Financing and 20-Year Project List

The City of Seattle relies on a diverse mix of revenue sources to finance its transportation projects, including local taxes, state and federal grants, and various fees. These funds support a wide range of initiatives, from street and bridge maintenance and public transit improvements to bicycle and pedestrian infrastructure. Seattle's transportation budget must be balanced to address competing priorities and immediate needs while also investing in long-term projects that align with the city's mobility, safety, sustainability and equity goals. As Seattle continues to grow and adapt to changing transportation needs and goals, the City will explore a range of options to secure adequate and stable funding for transportation investments. Funding will be coupled with strategies to manage demand and plan for growth and development where it can leverage key transportation improvements, especially new and planned transit service.

The tables in Figures A-28 and A-29 present estimated funding and projected expenditures, broadly categorized, for the period 2025-2035. Because much of the City's transportation budget has potential variability, the estimates are shown as a range from low to high. "High" revenue estimates assume 1) voter approval of relevant levies, bonds, sales taxes, and fees, 2) relatively high competitiveness for federal, state, and regional grants, and 3) higher local bonding, which may vary by budget cycle. "Low" revenue estimates assume no voter approval of transportation funds, low grant competitiveness, and low bonding. "High" and "low" projected expenditures were tailored to match available revenue to reflect a balanced budget to meet State law.

Figure A-27
Estimated Range of Future Transportation Revenue, 2025-2035

CATEGORY	LOW (000,000s)	HIGH (000,000s)
Dedicated Transportation Funding	$2,400	$2,880
Seattle Transit Measure (STM)	$122	$610
Voted Transportation Levies	$1,550	$2,030
Grants and Partnerships	$570	$1,140
General Fund and Cumulative Reserve	$590	$660
Long-term Financing	$200	$300
Voted Capital Bond Financing	$ -	$1,000
Total	$5,432	$8,620

Figure A-28
Estimated Range of Future Transportation Expenditures, 2025-2035

CATEGORY	LOW (000,000)	HIGH (000,000)
Operations and Maintenance	$2,382	$2,859
Major Maintenance and Safety	$1,425	$2,708
Mobility and Enhancements	$1,625	$3,053
Total	$5,432	$8,620

Over the longer term, the Seattle Department of Transportation continues to carry out work on its ongoing 20-year transportation improvement plan to address current infrastructure needs and anticipate future growth, as described in the Seattle Transportation Plan. Figure A-30 includes ongoing as well as newly planned projects and programs to accommodate travelers of all modes on Seattle's roadways. The list includes all projects and programs described in the 2024-2029 Capital Improvements Projects list (CIP), the Seattle Transportation Plan Appendix A: Large Capital Projects, and those projects and programs committed to in the 2024 Transportation Levy. The table also indicates projects that are included in the Regional Transportation Plan (RTP). Projects described here may be carried out in the 10-year period described in Figures A-28 and A-29 or over a longer time period. Figure A-30 also does not include operations and maintenance costs which are reflected in the earlier tables.

Where overlap exists between CIP, STP Large Capital Projects and levy commitments, projects have been consolidated into one line in Figure A-30. The list depicts known cost estimates from funded 6-year CIP and funding from the 8-year levy. A number of programmatic needs and project costs, including large projects, do not currently have detailed cost estimates out the full 20 years. In these cases, the table includes a qualitative assessment of the order of magnitude of costs for the Large Capital Projects described in the Seattle Transportation Plan. Where indicated, $ = less than $25M, $$ = $25M-$50M, and $$$ = above $50M. These are rough estimates as determined at the time of STP release. Actual cost estimates may change as more detailed project scoping occurs for particular projects.

Figure A-29
Project List and Estimated Funding

Project/Program Name	CIP Project #	RTP Project #	RTP Project Name	Funded CIP 2024-2029	Proposed Levy Funding 2025-2032	STP Cost Predictions
Bridge Load Rating	MC-TR-C006			2,192,281		
Bridge Painting Program	MC-TR-C007			16,674,906		
Bridge Seismic - Phase III	MC-TR-C008			26,015,579		
Bridge Rehab and Replace P II	MC-TR-C039			3,923,251		
Structures Major Maintenance	MC-TR-C112			42,680,691		
Arterial Asphalt/Concrete Ph 2	MC-TR-C033			17,516,690		
Non-Arterial St Resurf & Rest	MC-TR-C041			6,320,633		
Arterial Major Maint	MC-TR-C071			12,563,500	67,000,000	

Project/Program Name	CIP Project #	RTP Project #	RTP Project Name	Funded CIP 2024-2029	Proposed Levy Funding 2025-2032	STP Cost Predictions
Retaining Wall Replace Pgm	MC-TR-C032			1,298,766		
Hazard Mitigation-Landslide	MC-TR-C015			3,115,396		
Hazard Mitigation Pgm-Areaways	MC-TR-C035			1,799,830	3,000,000	
Seawall Maintenance	MC-TR-C098			2,390,362	5,000,000	
BMP - Urban Trails & Bikeways	MC-TR-C060			2,411,119		
BMP - Protected Bike Lanes	MC-TR-C062			17,377,258	16,000,000	
BMP - Greenways	MC-TR-C063			8,441,694	20,000,000	
PMP - Stairways	MC-TR-C031			1,959,163	4,000,000	
PMP - New Sidewalk Program	MC-TR-C058			18,111,106	111,000,000	
PMP - School Safety	MC-TR-C059			30,938,604	14,000,000	

Project/Program Name	CIP Project #	RTP Project #	RTP Project Name	Funded CIP 2024-2029	Proposed Levy Funding 2025-2032	STP Cost Predictions
PMP - Crossing Improvements	MC-TR-C061			8,499,995	14,000,000	
Sidewalk Safety Repair	MC-TR-C025			15,536,502	34,000,000	
Transit Corridor Improvements	MC-TR-C029			8,098,860	4,000,000	
Seattle Transportation Benefit District - Transportation Improvements	MC-TR-C108			29,900,000		
Shoreline Street Ends	MC-TR-C011			5,149,798		
Urban Design Capital Projects	MC-TR-C120			250,000		
Freight Spot Impr Pgm	MC-TR-C047			3,904,000	17,000,000	
Heavy Haul Network Program	MC-TR-C090			40,655,140	8,000,000	
SDOT ADA Program	MC-TR-C057			30,690,786	30,000,000	

Project/Program Name	CIP Project #	RTP Project #	RTP Project Name	Funded CIP 2024-2029	Proposed Levy Funding 2025-2032	STP Cost Predictions
New Traffic Signals	MC-TR-C020			2,495,518		
Next Gen ITS Improvements	MC-TR-C021			1,323,095	17,000,000	
Signal Major Maintenance	MC-TR-C026			5,433,840	15,004,520	
Vision Zero	MC-TR-C064			30,590,778	70,000,000	
Neighborhood Traffic Control	MC-TR-C019			3,258,356	7,000,000	
Neighborhood Large Projects	MC-TR-C018			3,711,070		
Safe Streets and Roads for All	MC-TR-C125			32,085,800		
NPSF - Your Voice, Your Choice	MC-TR-C022			-	39,500,000	
Northgate Brdg and 1st Ave MUP	MC-TR-C030			2,820,389		
Sound Transit 3 (ST3)	MC-TR-C088			48,921,696	33,000,000	

Project/Program Name	CIP Project #	RTP Project #	RTP Project Name	Funded CIP 2024-2029	Proposed Levy Funding 2025-2032	STP Cost Predictions
Lynnwood Link Extension	MC-TR-C089			65,000		
Roosevelt Multimodal Corridor	MC-TR-C013			113,568,951		
Madison Street BRT	MC-TR-C051	5173	RapidRide Corridor 1: Central Area - First Hill - Downtown	32,333,523		
Route 40 Northgate to Downtown	MC-TR-C079	5774	Northgate to Downtown Transit Improvements	14,374,934		
SR-520 Project	MC-TR-C087			4,111,985	500,000	
Revive I-5 Project Support	MC-TR-C124			550,000		
Urban Forestry Capital Estab	MC-TR-C050			811,248		
West Seattle Bridge Repair	MC-TR-C110			4,681,500		
CWF Overlook and EW Connection	MC-TR-C073	4282	Central Waterfront Project - Alaskan Way,	6,250,000		

Project/Program Name	CIP Project #	RTP Project #	RTP Project Name	Funded CIP 2024-2029	Proposed Levy Funding 2025-2032	STP Cost Predictions
			Promenade and Overlook Walk			
Waterfront Transportation Infrastructure Maintenance	MC-TR-C109			3,850,000		
North of Downtown Mobility Act	MC-TR-C101			6,153,846		
Accela Permitting	MC-TR-C001			3,000,000		
Accessible Mt. Baker	MC-TR-C002			1,000,000		$$
3rd Avenue Corridor Impr	MC-TR-C034	5632	Third Avenue Transit Spine	3,200,000		$$$
Center City St Car Connector	MC-TR-C040	5084	Seattle Center City Connector	92,695,135		$$$
CWF Alaskan Way Main Corridor	MC-TR-C072			28,857,000		$$$

Project/Program Name	CIP Project #	RTP Project #	RTP Project Name	Funded CIP 2024-2029	Proposed Levy Funding 2025-2032	STP Cost Predictions
Market / 45th Multimodal Corri	MC-TR-C078	5177	RapidRide Corridor 5: Ballard - U District - Laurelhurst	105,880		$
Graham Street Station	MC-TR-C082			-		$$
Aurora Avenue North Safety Improvements	MC-TR-C118	5768	Aurora Avenue Corridor Improvement Project	48,650,000	30,000,000	$$$
Harrison St Transit Corridor	MC-TR-C119	5801	Harrison St Transit Pathway	500,000	5,000,000	
NE 45th St Bridge I-5 Crossing Improvements	MC-TR-C122			1,500,000	500,000	$$$
NE 130th St/NE 125th Corridor Improvements	MC-TR-C123	5769	NE 130th St Station: Corridor Access & Safety Improvements	18,401,374	55,600,000	$$$
1st Ave N | Bicycle Connection						$$
1st Ave S | Multimodal Improvements						$$
4th Ave S | Multimodal Improvements						$$

Project/Program Name	CIP Project #	RTP Project #	RTP Project Name	Funded CIP 2024-2029	Proposed Levy Funding 2025-2032	STP Cost Predictions
5th Ave | Multimodal Improvements		5637	4th / 5th Avenue Protected Bike Lane			$$
8th Ave S | Multimodal Improvements						$$
12th Ave | Multimodal Improvements						$$
14th Ave NW | Multimodal Improvements						$
15th Ave NE | Multimodal Improvements					12,700,000	$$
15th Ave W & Elliott Ave W | Multimodal Improvements						$$
16th Ave SW | Multimodal Improvements						$
23rd Ave | Multimodal Improvements		5777	23rd Ave Bus Rapid Transit		37,501,500	$$
35th Ave SW | Multimodal Improvements					32,763,500	$$

Project/Program Name	CIP Project #	RTP Project #	RTP Project Name	Funded CIP 2024-2029	Proposed Levy Funding 2025-2032	STP Cost Predictions
N 50th St/Green Lake Way N/Stone Way | Intersection Redesign						$
N 85th St + NE 65th St | Transit + Multimodal Improvements		5075	Priority Bus Corridor 4 Crown Hill			$$
NE 145th St | Comfortable Connections					5,000,000	$$
SW Admiral Way | Transit + Multimodal Improvements						$$
Airport Way S | Multimodal Improvements						$$
SW Alaska St Link light rail station | Multimodal Improvements						$
Alki Trail | Comfortable Connections						$$
Ballard Bridge						$$$

Project/Program Name	CIP Project #	RTP Project #	RTP Project Name	Funded CIP 2024-2029	Proposed Levy Funding 2025-2032	STP Cost Predictions
Ballard to Northgate | Multimodal Improvements		5141	RapidRide Corridor 6: Northgate - Ballard - Fremont - SLU - Downtown			$$$
Boren Ave | Multimodal Improvements						$$
Burke Gilman Trail | Comfortable Connections						$$
Burke Gilman Trail Missing Link		2668	Burke-Gilman Trail Extension		20,000,000	$$
California Ave SW | Multimodal Improvements						$$
Chief Sealth Trail | Comfortable Connections					2,000,000	$$
Chinatown-International District Station | Multimodal Improvements						$$
Denny Way | Multimodal Improvements		5218	Priority Bus Corridor 2 Denny		4,000,000	$

Project/Program Name	CIP Project #	RTP Project #	RTP Project Name	Funded CIP 2024-2029	Proposed Levy Funding 2025-2032	STP Cost Predictions
Dravus St | Multimodal Improvements						$$
East Marginal Way | Multimodal Improvements					9,430,000	$$
Eastlake to Rainier Beach | Transit + Multimodal Improvements		5073	Priority Bus Corridor 1: Othello		75,300,000	$$$
Elliott Bay Trail | Comfortable Connections						$
Fauntleroy Way SW | Multimodal Improvements						$$
Fauntleroy Way SW Boulevard | Multimodal Improvements						$$
W Garfield St |Comfortable Connections						$$

Project/Program Name	CIP Project #	RTP Project #	RTP Project Name	Funded CIP 2024-2029	Proposed Levy Funding 2025-2032	STP Cost Predictions
Georgetown to Beacon Hill | Comfortable Connections					5,000,000	$$
Greenwood & Phinney | Transit + Multimodal Improvements		5156	Priority Bus Corridor 5 Greenwood			$$
Harbor Island | Freight and Pedestrian Improvements						$$$
Highland Park Way | Comfortable Connections					5,500,000	$$
Holgate St Bridge						$$$
Interbay Station and South Ship Canal | Comfortable Connections						$$
Jackson St | Multimodal Improvements (Rainier Ave S to 31st Ave S)						$$
S Jackson St | Transit + Multimodal						$$

Project/Program Name	CIP Project #	RTP Project #	RTP Project Name	Funded CIP 2024-2029	Proposed Levy Funding 2025-2032	STP Cost Predictions
Improvements (1st Ave S to Rainier Ave S)						
James St | Multimodal Improvements					14,823,500	$
Lake City Way | Multimodal Improvements						$$
Lake City Way to Northgate | Transit + Multimodal Improvements						$$
Lake Washington Blvd						$
Leary Way NW Multimodal Improvements						$$$
S Lucile St Reconstruction and Redesign						$$
NW Market St | Multimodal Improvements					11,914,000	$$

Project/Program Name	CIP Project #	RTP Project #	RTP Project Name	Funded CIP 2024-2029	Proposed Levy Funding 2025-2032	STP Cost Predictions
Martin Luther King Jr. Way | Multimodal Improvements (E Madison St to S McLellan St)						$$
Martin Luther King Jr. Way | Multimodal Improvements (Rainier Ave S to city limits)						
Northlake Retaining Wall						$$
SW Orchard St and Dumar Way SW | Comfortable Connections						$$
Pike Place | Event Street						$
Pike-Pine | Multimodal Improvements		5638	Pine - Pike Protected Bike Lane			$$
Rainier Ave S | Multimodal Improvements					57,732,000	$$$
Rainier Valley | RapidRide Coordination					47,964,000	$

Project/Program Name	CIP Project #	RTP Project #	RTP Project Name	Funded CIP 2024-2029	Proposed Levy Funding 2025-2032	STP Cost Predictions
SW Roxbury St | Comfortable Connections						$$$
Sand Point Way NE | Multimodal Improvements						$$$
Ship Canal | Pedestrian-Bicycle Crossing Study						$$$
South Lake Union | People Streets and Public Spaces		5711	Thomas Street Project			$
South Park | Comfortable Connections					22,333,000	$$
Southwest to Southeast Seattle | Transit + Multimodal Improvements					9,062,000	$$
S Spokane St | Multimodal Improvements						$$
Sylvan Way SW | Comfortable Connections						$$

Project/Program Name	CIP Project #	RTP Project #	RTP Project Name	Funded CIP 2024-2029	Proposed Levy Funding 2025-2032	STP Cost Predictions
U District/Lake City NE | Multimodal Improvements		5079	Priority Bus Corridor 3 Lake City			$$
University Bridge | Comfortable Connections						$
Virginia St & Stewart St | Multimodal Improvements		5279	Westlake Multimodal Transportation Hub			$$
West Seattle to Rainier Valley | Transit + Multimodal Improvements						$$
E Yesler Way | Multimodal Improvements						$$
AAC: NE 65th St: 2nd Ave NE to 35th Ave NE					11,914,000	
AAC:Elliott Ave & Western Ave: Bell St to Thomas St					14,605,000	

Project/Program Name	CIP Project #	RTP Project #	RTP Project Name	Funded CIP 2024-2029	Proposed Levy Funding 2025-2032	STP Cost Predictions
AAC: Fauntleroy Way SW: 35th Ave SW to SW Alaska St, to keep roadway functional during light rail construction by making street repairs and spot improvements					2,600,000	
Curb and Pavement Marking					6,000,000	
Preventative Bridge Maintenance					127,000,000	
Structural Repairs and Upgrades: Ballard Bridge Structural Repairs					15,000,000	
Structural Repairs and Upgrades: Magnolia Bridge Structural Repairs					16,000,000	
Structural Repairs and Upgrades: Ship Canal Electrical/Mechanical - Ballard					15,000,000	

Project/Program Name	CIP Project #	RTP Project #	RTP Project Name	Funded CIP 2024-2029	Proposed Levy Funding 2025-2032	STP Cost Predictions
Structural Repairs and Upgrades: Ship Canal Electrical/Mechanical - Fremont					12,500,000	
Structural Repairs and Upgrades: Ship Canal Electrical/Mechanical - University					12,500,000	
Project Readiness: Bridge Future grant/bond planning (1st and 4th over Argo, W Dravus St, NE 45th St Viaduct, Magnolia Cost Estimates and Emergency Planning)					15,000,000	
Transit Improvements and Access to Light Rail					13,000,000	
Transit Improvement and Accesss to Light Rail: Sound Transit Access Planning					1,000,000	

Project/Program Name	CIP Project #	RTP Project #	RTP Project Name	Funded CIP 2024-2029	Proposed Levy Funding 2025-2032	STP Cost Predictions
Transit Improvement and Accesss to Light Rail: Judkins Park Connections					1,500,000	
Transit Spot Improvements					27,000,000	
Transit Passenger Safety					9,000,000	
Traffic Signal Timing: Signal Operations					15,000,000	
Traffic Signals and Maintenance: New Traffic Signals					19,567,921	
Traffic Signals and Maintenance: Signal Maintenance					10,427,559	
Transportation Operations					18,000,000	
Sign Maintenance					5,000,000	

Project/Program Name	CIP Project #	RTP Project #	RTP Project Name	Funded CIP 2024-2029	Proposed Levy Funding 2025-2032	STP Cost Predictions
Georgetown connections (Study)					500,000	
14 Ave S (S Director St to South Park Bridge at Dallas)					5,000,000	
Upgraded Bike Lanes (aka Better Bike Barriers)					8,000,000	
Bike Lane Maintenance					8,000,000	
Bike Spot Improvements					10,000,000	
People Streets Capital Projects					23,000,000	
People Streets Capital Projects: Beacon, N 130 St & Rainier Complete Streets contributions					1,600,000	
People Streets Capital Projects: CID Transformation, Alley Activation and FIFA					2,000,000	

Project/Program Name	CIP Project #	RTP Project #	RTP Project Name	Funded CIP 2024-2029	Proposed Levy Funding 2025-2032	STP Cost Predictions
People Streets Capital Projects: Cap Hill low cost implementation (E Union Street Revival Corridor)					2,000,000	
People Streets Capital Projects: NE 42nd St Green Street Improvements					2,000,000	
People Streets Capital Projects: Occidental Promenade					5,600,000	
Downtown Activation (near-term maintenance, placemaking, coordination, longer-term 3rd Ave vision)					15,000,000	
People Streets and Wayfinding Maintenance					2,000,000	
Pedestrian Lighting					10,000,000	
Lid I-5 Private Funding Study					500,000	

Project/Program Name	CIP Project #	RTP Project #	RTP Project Name	Funded CIP 2024-2029	Proposed Levy Funding 2025-2032	STP Cost Predictions
Climate and Electrification Program					32,000,000	
Low Pollution Neighborhoods					8,000,000	
Urban Forestry Field Ops					14,000,000	
Expanded Tree Program					5,000,000	
Urban Forestry-Arborist Svcs					10,000,000	
Freight Program					10,000,000	
Port Connection to I-90/I-5					5,000,000	
Leary Way Industrial Zone Safety Improvements					5,000,000	

Appendix 2 Housing

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Introduction

Policy Framework and Housing Appendix Contents

The Housing Appendix provides data and analysis to inform Comprehensive Plan policies on housing consistent with requirements of state Growth Management Act, VISION 2050, and the King County Countywide Planning Policies. With the adoption of House Bill (HB) 1220 in 2021, the state Legislature strengthened GMA requirements related to housing policy and analysis. This appendix includes extensive new data and analysis that responds to these requirements.

Overview of Data Sources

The Housing Appendix draws from a wide array of resources and data. These include projections from the state Department of Commerce as well as datasets from the federal Census Bureau and Department of Housing and Urban Development (HUD), Puget Sound Regional Council (PSRC), King County Department of Assessments, Seattle City building permits database, and housing market analysis and datasets from companies such as Zillow and CoStar.

The analyses address different time periods or points in time. Temporal variation reflects differences in data release schedules and data availability at the time analysis for this appendix was performed.

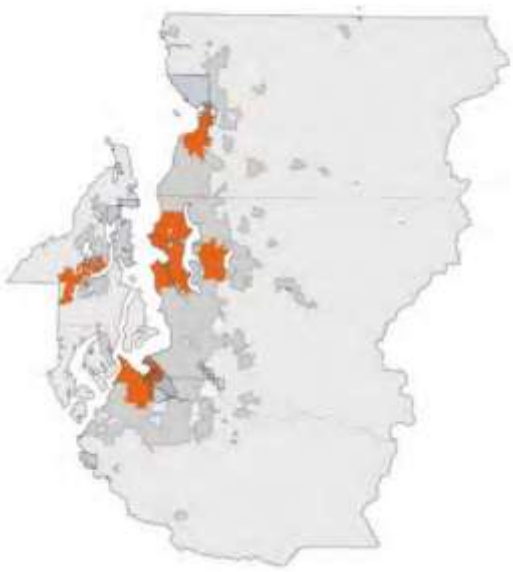
Seattle's Role as a Large, Growing Metropolitan City

The 2020 Census counted 737,015 people in Seattle. This ranks Seattle as the 18th most populous U.S. city and the most populous city in King County, the Puget Sound region, and the state of Washington.

As shown in Figure A-31, Seattle is one of the five "Metropolitan Cities" in the Regional Growth Strategy adopted by PSRC as part of our region's VISION 2050 long-range plan. This designation acknowledges Seattle's role as a cultural, economic, and transit hub within the county and region.

As the Metropolitan Cities within King County, Seattle and Bellevue are expected to accommodate 44 percent and 46 percent of the county's population and employment growth, respectively. With regards to planned *regionwide* growth, Seattle and Bellevue together account for 22 percent of the increase in residents and 27 percent of the increase in jobs.

Figure A-30
Seattle: One of five Metropolitan Cities in the Puget Sound Region



Seattle in the 2020 Census: By the Numbers

- The 2020 Census counted 737,015 residents in Seattle, making it the 18th most populous city in the U.S.
- Seattle had the 3rd fastest population growth from 2010 to 2020 of the 50 largest U.S. cities.
- Seattle was one of 14 cities in the U.S. that grew by more than 100,000 people from 2010 to 2020.

Image from Puget Sound Regional Council VISION 2050 Regional Growth Strategy

Seattle's Growth in Recent Decades

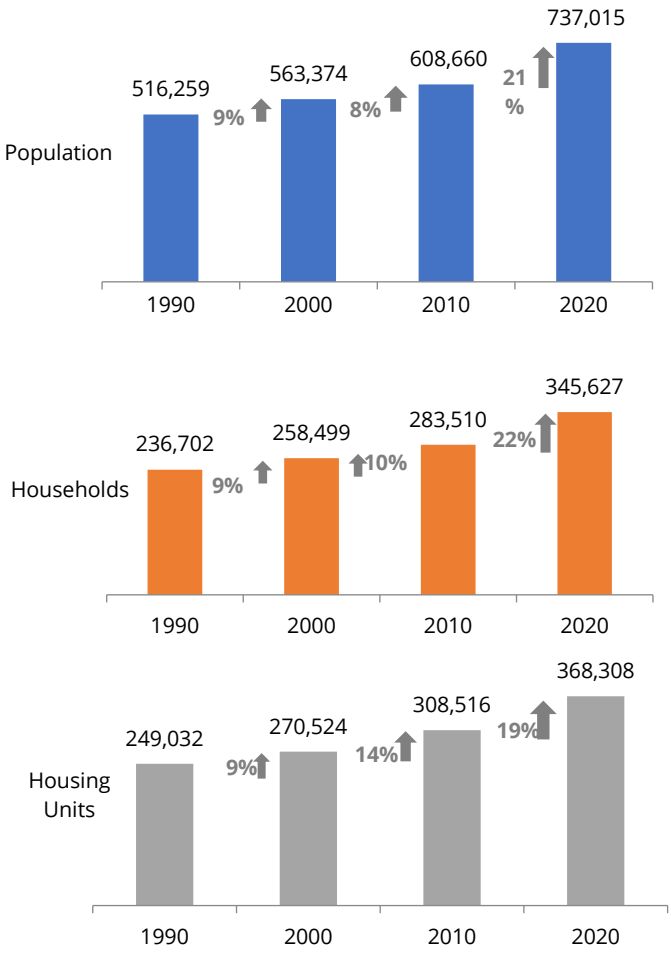
Seattle has seen substantial population, household, and housing growth in recent decades.

The decade between 2010 and 2020 was a period of especially rapid population growth in Seattle, driven largely by our city's strong employment opportunities and high quality of life.

As illustrated in Figure A-32, Seattle's population grew by 21 percent from 2010 to 2020. This was more than double the 10-year growth rate experienced in each of the two preceding decades. A similar pattern is seen with the growth in the number of households in Seattle. While Seattle's housing supply also grew substantially between 2010 and 2020, it did so at a slower pace than the city's population and households.

For several years during the second half of the 2010s Seattle's rapidly growing population made it one of the fastest-growing large cities in the U.S. according to the Census Bureau annual population estimates.

Figure A-31
Seattle Population, Households and Housing



Source: Decennial census counts, U.S. Census Bureau.

Figure A-33 includes statistics on job growth and compares how Seattle's growth between 2010 and 2020 compares to that of King County as a whole. Between 2010 and 2020, the number of covered jobs located in Seattle increased by 38 percent, which is double the 19 percent rate of the city's growth in housing units, and more than one and a half times the 24 percent growth in covered jobs in King County overall.

The fact that Seattle's housing growth, while rapid, occurred at a slower rate than Seattle's job growth has contributed to the rapid increase in rents and housing prices.

Figure A-32
Population, Households, Housing, and Jobs
Seattle and King County: 2010 and 2020

	Seattle				King County			
	2010	2020	Change 2010-2020	% Change 2010-2020	2010	2020	Change 2010-2020	% Change 2010-2020
Population	608,660	737,015	128,355	21%	1,931,249	2,269,675	338,426	18%
Households	283,510	345,627	62,117	22%	789,232	917,764	128,532	16%
Housing	308,516	368,308	59,792	19%	851,261	969,234	117,973	14%
Covered Jobs	462,739	637,913	175,174	38%	1,149,642	1,430,940	281,298	24%

Sources: Population, households and housing units from the decennial census, U.S. Census Bureau. Covered employment estimates published May 3, 2022, on PSRC's data portal.

Notes: Covered employment refers to jobs covered by the state unemployment insurance and excludes self-employed workers, proprietors, CEOs, and some other types of workers. PSRC estimates that regionally covered employment comprises roughly 85-90% of total employment. PSRC estimates that covered employment is roughly 85-90% of total employment.

Seattle's Population Growth Since 2020

After a temporary decrease in Seattle's population early in the COVID-19 pandemic, Seattle reclaimed its status from the late 2010s as one of the fastest-growing large cities in the nation. According to the Census Bureau's Vintage 2022 population estimates, Seattle was the fastest growing of the 50 largest cities in the U.S. from for the period July 1, 2021, to July 1, 2022.

Most recent population available for Seattle

- The Census Bureau's population estimates peg Seattle population at 749,256 as of July 1, 2022. With growth of 2.4% over July 1, 2021, this places Seattle as the fastest growing city among the 50 largest cities in the United States.
- The Washington State Office of Financial management, which uses a different methodology than the Census Bureau, estimates that Seattle's population was 762,500 on April 1, 2022. And 779,200 on April 1, 2023.

Seattle's Projected Population Growth

Given recent trends—along with the strong economy, urban amenities, and natural beauty that Seattle and surrounding region offer—we anticipate that our city will continue to see substantial population growth. Informed by these considerations, and by regional and county-level projections, we expect Seattle's population to reach one million by the middle of this century and potentially reach this figure by the 2044 horizon for the One Seattle Plan.

Growth Targets and Housing Need Projections

Growth Targets

Under GMA, Seattle must plan for and accommodate through zoned capacity the growth targets allocated to the city, consistent with population projections prepared by the state and frameworks provided by regional and countywide planning policies.

In 2021, the King County GMPC approved housing and employment growth targets for jurisdictions in the county to integrate into our 2024 comprehensive plan updates. Even though the planning period for our 2024 updates is 20 years, the growth targets in the CPPs refer to a 25-year period of 2019-2044 to reflect the base year data available at the time the targets were adopted.

For Seattle, the 25-year growth targets include at least 112,000 net new housing units and 169,500 net new jobs. The targets reflect Seattle's important role as a Metropolitan City in the VISION 2050 Regional Growth Strategy. The housing targets adopted by GMPC in 2021 were based on OFM population projections released in 2017 and are also consistent with the more recent projections released in 2022.[2]

Because the City's Comprehensive Plan covers a 20-year period, Seattle adapted the 25-year target to a 20-year timeframe for consistency with the One Seattle Comprehensive Plan's planning period spanning 2024 to 2044.[3] Accounting for recent and ongoing growth, the estimated 20-year growth targets for the One Seattle Plan are 80,000 net new housing units and 158,000 net new jobs.

Growth targets in the CPPs are one source of information used to estimate the housing needs addressed in the One Seattle Plan. In addition to adopted targets, we also consider the following factors in identifying future housing need:

- **Past under-production.** Over the past decade, housing growth has lagged population, household, and employment growth in Seattle. This trend contributes to an overall housing shortage that drives housing costs ever higher. Planning for additional housing production in the future can help to alleviate this pressure and more completely meet the needs of Seattle's current residents.

[2] For details, see agenda item "Washington State Office of Financial Management 2022 Growth Projections" presented by the Interjurisdictional Staff Team (IJT) at the GMPC Meeting, March 22, 2023.

[3] We prorated the 25-year housing growth target to our 20-year planning period by using building permit data and subtracting from the 25-year housing target a) an estimate of actual housing growth from the end of 2019 to the end of 2022 and b) a short-term projection of growth for the 2023 and 2024 calendar years. We employed a similar, though not identical, strategy to prorate the 25-year employment growth targets to our 20-year planning period.

- **Lack of housing diversity.** Seattle's housing stock is dominated by two categories of housing: increasingly expensive single-family detached dwellings and smaller rental apartments. Recent growth is predominantly zero-bedroom and one-bedroom apartments. Planning for abundant housing supply, especially new housing options such as middle housing, can help to alleviate market pressure and boost housing choices for larger households, households with low- to moderate-incomes, and others.

- **Uncertainty about future growth.** Adopted growth targets are the product of analyses and policy goals. There is considerable uncertainty about the pace of future growth. For example, since the current Seattle 2035 Comprehensive Plan was adopted in 2015, Seattle has grown at approximately twice the rate that was anticipated in the growth targets in that plan. Factors such as continued strong economic growth or even climate migration could lead to future growth in Seattle that could significantly exceed our adopted GMA growth targets.

Housing Need Projections

Per new GMA requirements, the state Department of Commerce (Commerce) provides county-level projections of housing needs for households by income category, as well as the need for emergency housing and permanent supportive housing (PSH). GMPC has allocated these projections to each local jurisdiction to plan for and accommodate in their comprehensive plan updates.

State projections of future housing needs are designed to meet several overarching goals:

- First, that no household will have to pay more than 30 percent of its income on housing (the federal threshold for cost burden).

- Second, the housing needs of the homeless population will be fully met through permanent housing, including permanent supportive housing, and emergency housing.

The projections from Commerce present housing needs in two broad categories: a permanent housing category, with projected needs distributed by income level, and an emergency housing units/beds category.

STATE METHODOLOGY FOR PROJECTING HOUSING NEEDS

Following is a summary of the approach used by Commerce to project housing needs for each county.[4]

[4] Commerce's guidebook "Establishing Housing Targets for Your Community" (Book 1), published July 2023, provides details on the sources, assumptions, and models used to project housing needs. (See pages 27-57.) This book is available on Commerce's Updating GMA Housing Elements webpage.

Permanent housing units: Commerce's model for projecting growth in the number of housing units needed by income level addresses current[5] unmet needs as well as needs associated with projected population growth.

- **Housing needs of current housed residents.** The high market cost of housing, combined with an insufficient supply of subsidized below market rate housing, means that many existing households, especially those in the lowest income categories, cannot find housing that is affordable to them and are thus cost burdened (i.e., paying more than 30% of their income for housing). In order to relieve the cost burden for these households, a portion of each county's projected need includes lower cost units, many of which would have to be subsidized to be affordable to lower-income households (generally below 50% of AMI). Market rate units currently occupied by low-income households would be freed up to meet housing needs at higher income levels, thus theoretically reducing the need to add units that are affordable to moderate income households.
- **Housing units needed for the current population experiencing homelessness.** Commerce assumes that 90 percent of the population experiencing homelessness needs permanent housing affordable at 0-30% of AMI and the remaining 10 percent need permanent housing affordable at 30-50% of AMI.
- **Housing needs of new households.** The remainder of the 25-year need for housing that is affordable at each income level is driven by population growth, as projected by the State Office of Financial Management. Commerce assumes that the proportion of future households at each income level will be consistent with the existing distribution of household income across income levels in each county.

Permanently supportive housing (PSH) is defined by Commerce as subsidized rental housing without limits on length of tenancy that provides on- or off-site voluntary services for people who need comprehensive support to successfully stay housed. This form of housing is tailored to persons who are living with complex and disabling behavioral or physical health conditions and who are experiencing homelessness or at imminent risk of homelessness.[6]

In their model, Commerce categories PSH units along with other forms of permanent housing while making the simplifying assumption that PSH units serve only households with incomes at or below 30% of AMI. Commerce's approach for projecting PSH needs considers both current unmet needs and ongoing needs. The model relies on estimates of both people experiencing chronic

[5] Here we are using the term "current" to describe baseline existing conditions in the Commerce model.

[6] These descriptions of PSH and Emergency Housing are drawn from Commerce's guidance in, Establishing Housing Targets for Your Community, July 2023)

homelessness and people experiencing homelessness on a non-chronic basis who have a disabling condition, using these conditions as indicators that PSH would best meet these persons' needs.[7]

Emergency housing encompasses temporary indoor accommodations for individuals or families who are homeless or at imminent risk of becoming homeless. The emergency housing need projections by Commerce are for emergency housing and emergency shelters that provide overnight accommodations including, but not limited to, temporary apartments, hotel rooms, traditional shelter arrangements, shelters for people fleeing domestic violence, and homes in tiny home villages.

In modeling Emergency Housing needs, Commerce's model aims to estimate the additional amount of emergency housing required to "functionally end unsheltered homelessness."[8] The model accounts for the baseline homeless population not yet served in emergency housing and uses the results of a simulation based on ten risk factors (a few of which include evictions, unemployment, severe rent burden, overcrowded housing, and incarceration) to project the number of people expected to become homeless each year.[9]

LOCAL ALLOCATION OF HOUSING NEEDS

The King County GMPC used a two-step methodology to allocate the housing need at each income level to cities:

- **Step 1:** Allocate shares of countywide need at each income level proportionally based on each city's share of overall projected housing growth through 2044. Unlike the overall housing target, which was adjusted from 25 years to 20 years, projected need by affordability level retains a 25-year period due to CPP requirements and technical limitations in the ability to adjust for a shorter time period.
- **Step 2:** Adjust the mix of housing need to reflect a greater need to add units that can be affordable to lower-income households (with incomes at or below 80% of AMI) in cities where 1) housing costs are higher, 2) the supply of income-restricted affordable units is relatively low, and/or 3) there is a high number of jobs relative to housing units.[10]

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[7] Commerce's model assumes each person in need of PSH will stay in emergency housing for some time prior to moving into a PSH unit.

[8] For more background, see page 43 in Establishing Housing Targets for Your Community.

[9] Commerce notes that the projections of emergency housing needs assume only modest improvements over time in system performance. Commerce points out that substantial increases in resources devoted to affordable housing production or vouchers could reduce rates of homelessness and the corresponding need for emergency housing beds.

[10] Specifically, increases to the portion of a growth target dedicated to affordable housing were made in jurisdictions where existing proportions of units affordable at or below 80% of AMI are lower, income-restricted housing shares of housing are lower, and the imbalance of low-wage workers to low-wage jobs is more pronounced. The allocation methodology is described in AHC recommendations sent to the GMPC on December 29, 2022.

Figure A-34 shows the resulting 25-year housing supply estimates and need projections for Seattle.

Figure A-33
Seattle Housing Supply Estimates and Need Projections

	Permanent Housing Units								Emergency Housing
	Total	0 to ≤30% of AMI		>30% to ≤50% of AMI	>50% to ≤80% of AMI	>80% to ≤100% of AMI	>100% to ≤120% of AMI	>120% of AMI	
		Non-PSH	PSH						
Seattle Total Future Housing Needed: 2044	480,307	42,041	20,255	45,691	62,050	76,752	50,327	183,191	25,734
Seattle Current Housing Supply: 2019 Baseline	368,307	13,469	5,231	26,547	54,064	71,330	44,177	153,489	4,333
Seattle Net New Housing Needed: 2019-2044	112,000	28,572	15,024	19,144	7,986	5,422	6,150	29,702	21,401

Source: 2021 King County Countywide Planning Policies as amended August 15, 2023 (Ordinance 19660) and ratified November 30, 2023.

Notes: The Housing Need Projections are contained in Housing Chapter Table H-1: "King County Countywide and Jurisdictional Housing Needs 2019-2044" and Appendix 4 Table H-2: King County Countywide and Jurisdictional Housing Needs 2019-2044.

For reference, Figure A-35 shows 2023 maximum income thresholds, by household size, for each of the AMI-based categories for which housing need is projected.

Figure A-34
AMI-Based Income Limits by Household Size, 2023

HUD Area Median Family Income in 2023: 146,500					
Number of Persons in Household or Family	30% of AMI	50% of AMI	80% of AMI	100% of AMI	120% of AMI
1	$30,750	$51,300	$82,050	$102,550	$123,050
2	$35,150	$58,600	$93,750	$117,200	$140,650
3	$39,550	$65,950	$105,500	$131,850	$158,200
4	$43,950	$73,250	$117,200	$146,500	$175,800
5	$47,450	$79,100	$126,600	$158,200	$189,850
6	$51,000	$84,950	$135,950	$169,950	$203,950

Source: Area Median Family Income and household-size adjustment factors from U.S. Department of Housing and Urban Development (HUD) Fiscal Year 2023 Income Limits Documentation System.

Notes: HUD estimates Area Median Family Income (HAMFI) annually for metropolitan areas across the U.S.; for Seattle the applicable area is a combination of King and Snohomish counties. After calculating HAMFI, HUD applies household size and other adjustments, HUD publishes area-specific income eligibility limits used to establish affordable housing restrictions. Consistent with the state GMA, the Housing Appendix uses the term "area median income" to refer to HAMFI.

This table is provided for general reference. The income limits shown here are calculated by multiplying HAMFI by the applicable percentages of AMI and then applying the standard household size adjustments HUD uses in calculating income limits. The income limits in this table do *not* include other adjustments that HUD and other agencies make in calculating income limits for administering affordable housing programs, as those limits vary between types of affordable housing regulatory agreements. Income limits applicable to City of Seattle regulatory agreements are listed on the Office of Housing's website.

Commerce's model factors in existing unmet need by estimating the number of units that would have to be produced to house each cost-burdened renter household[11] in a unit they can afford. The model assumes that producing housing units for cost-burdened renter households in a given

[11] Commerce does not include cost-burdened owner households in calculating production of new units needed to eliminate cost burden, explaining that these households tend to be in a fundamentally different position compared to renter-households and that "building new housing units for these owner households to occupy is not necessarily the best or only solution for these households."

income category (e.g., 0-30% of AMI), not only meets the needs of these households, but *also* vacates units affordable to households in the next income category up (e.g., 30-50% of AMI).[12]

By assuming vacated units accommodate cost-burdened households in the next income category up, the model estimates lower new production needs in categories between 50 and 120% of AMI than would otherwise be necessary to address existing unmet need.

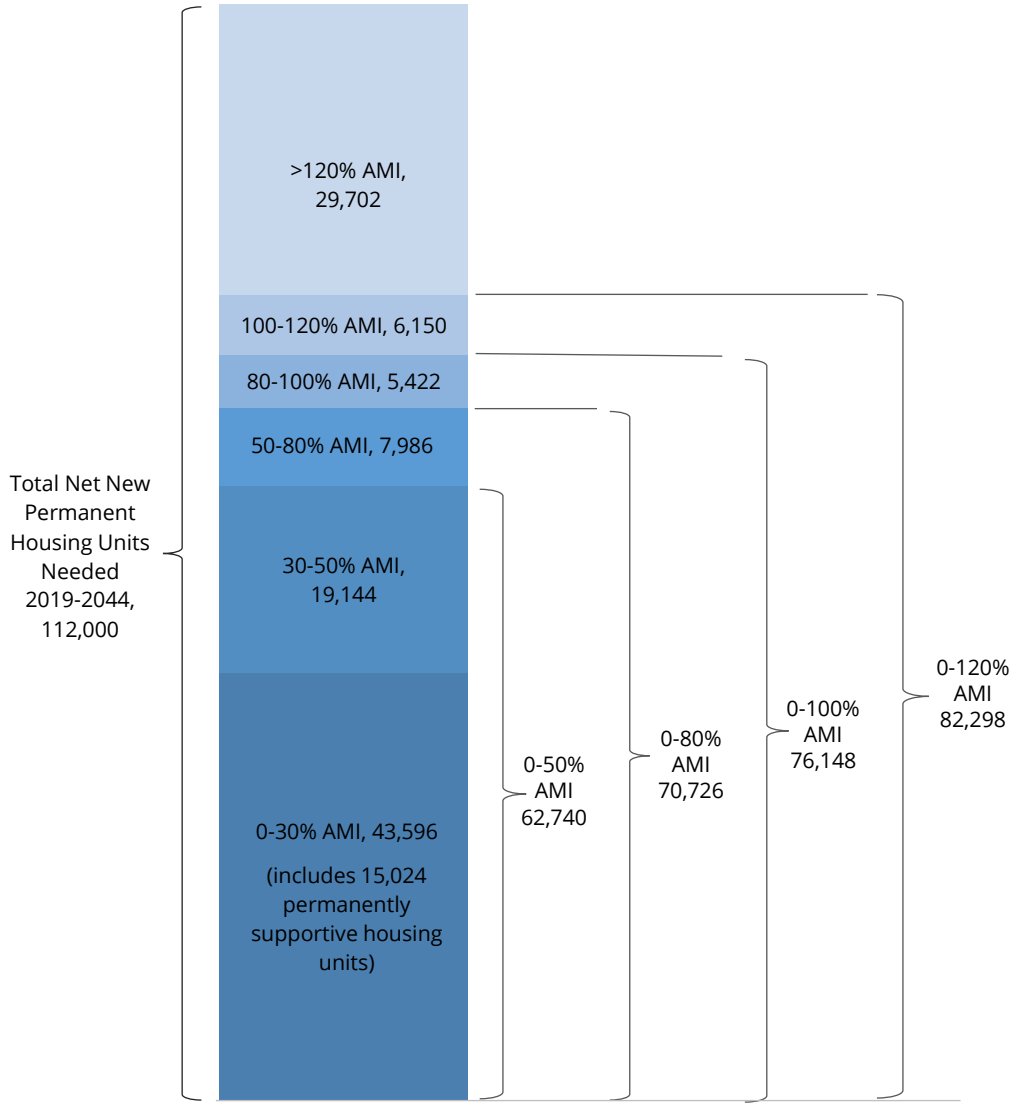
Further, as Commerce explains, projected need for each income category above 30% of AMI "assumes success at meeting the housing needs of households at lower income levels." However, whether sufficient funding can be assembled to fully meet the needs of the lowest-income households is very uncertain.

By assuming needs within the lowest income categories are met, the model may underestimate needs of other low- and moderate-income households. After all, if the needs of the lowest-income households remain unmet, those shortfalls will not only leave those households cost burdened but also contribute to shortages felt by households somewhat higher up the income ladder.

As guidance from Commerce suggests, considering housing need on a cumulative basis in addition to looking at need in discrete income categories can help round out understanding of local housing needs. Figure A-36 shows projected net new housing needs within discrete income categories *and* under cumulative thresholds. Viewed *cumulatively*, more than half of the projected need in Seattle is for housing affordable at or below 50% of AMI, and roughly 63 percent is for housing affordable at or below 80% of AMI. Furthermore, nearly three-quarters of the net new need is for housing affordable at or below 120% of AMI.

[12] As explained by Commerce, "the model determines 'New Production to Address Need' at each income level over time, assuming that 1/25th of the need to eliminate renter cost burden is built each year. For every unit built, the needs of up to two cost-burdened households is assumed to be addressed. For example, when a new housing unit affordable at 0-30% AMI is built, it can accommodate a baseline cost-burdened household with income of 0-30%. Then, the unit that household previously occupied is vacated and available to accommodate another higher-income cost-burdened household.... The model continues to build homes and vacate units until there are no more cost-burdened renter households to accommodate."

Figure A-35
Seattle Net New Permanent Housing Units Needed by Income Category, 2019-2044



Source: Table H-1 in GMPC Motion 23-1 to amend the 2021 King County Planning Policies.
Notes: Housing needs include 15,024 units of permanently supportive housing in the 0-30% AMI category.

As stated in the Housing element, Seattle will continue to prioritize addressing the needs of households with incomes of 30% AMI or less given that the needs are, by far, greatest among these households. At the same time, aggressive efforts are necessary to increase production of income-restricted homes for all low-income categories and remove barriers to help the market meet the needs of households with incomes at or below 120% of AMI.

Historical Context of Racist Housing and Land Use Practices

Today's housing crisis has origins in a history of discrimination that shaped where Black, Indigenous, and other people of color could live, own land, and sustain their culture since the arrival of white European settlers in the Pacific Northwest in the 1840s. At that time, Washington State was part of the Oregon Territory and therefore subject to Black exclusion laws, which discouraged through threat of physical punishment, and later outright forbade, Black people from settling, owning property, or making contracts as a way of ensuring the region's early development was primarily white. ,

In 1855, the Treaty of Point Elliott was signed, establishing the Tulalip, Port Madison, Swinomish, and Lummi reservations and guaranteeing hunting and fishing rights to the Tribes represented by its signatories. In exchange, the Tribes ceded tens of thousands of acres of their land, some of which had already been claimed by European-American settlers. In 1864, the Washington legislature granted anyone the right to own land "as if such an alien were a native citizen of this Territory or of the United States," as a measure to promote immigration by white people to displace Native Americans.[13] After the city of Seattle was first incorporated in 1865, one of its first laws (Ordinance 5) called for the removal of Indigenous people from within city limits, barring Native people from living in Seattle unless a non-Native person needed to employ them. When the City government was dissolved in 1867 and reincorporated in 1869, the ban on Native residents was not re-enacted, but other efforts to exclude Native people persisted.

Exclusion and forced relocation of certain groups continued through the end of the 19th and into the 20th century with anti-immigrant, especially anti-Asian, policies. This included 1) the federal Chinese Exclusion Act in 1882 and anti-Chinese riots that followed in Seattle; 2) the Alien Land Law enshrined in Washington's first constitution prohibiting land ownership by "aliens ineligible for citizenship, which targeted Asian people whom Congress ruled in 1875 could not become citizens; and 3) forced incarceration of Japanese and Japanese Americans during World War II. Displacement also resulted from various city building efforts. The creation of the Ship Canal and Ballard Locks in the 1910s lowered the level of Lake Washington by more than eight feet and caused the Black River, on which many Duwamish lived and depended for fishing, to disappear. The construction of Interstate 5 through downtown Seattle resulted in the loss of homes, businesses, and cultural anchors in the Chinatown–International District.

The 20th century saw the public and private sector turn to land use and housing as tools to protect and concentrate property ownership and wealth within white communities. Zoning was one of the

[13] https://digitalcommons.law.seattleu.edu/cgi/viewcontent.cgi?article=1286&context=sulr, https://depts.washington.edu/civilr/alien_land_laws.htm

first practices used to establish and solidify exclusion. In the early 1900s, Los Angeles and New York were early adopters of standards separating uses and regulating building form. But zoning did not arise only to shape the built environment or protect public health. The racism of mainstream white society was another basis for the rise of land use regulation.[14] First Baltimore and then other cities, particularly in the South, employed zoning for explicit racial segregation, with separate districts for white and Black residents. After this was ruled unconstitutional in 1917, city officials substituted ostensibly race-neutral standards like minimum lot size and prohibitions on multifamily housing as covert ways to shield white neighborhoods from lower-income residents and people of color.

Those standards are still present in Seattle's zoning today. While Seattle never had racial zoning, the City's first zoning ordinance, adopted in 1923, was promoted by the Zoning Commission as a way to prevent "lowering…the standard of racial strength and virility"[15] and crafted by a planner who touted zoning as a way to "preserve the more desirable residential neighborhoods" and prevent movement into "finer residential districts … by colored people."[16] Before the advent of zoning, Seattle's building code had regulated development, and dwellings with multiple families were allowed citywide. The 1923 zoning ordinance established the "First Residence District" where only "detached buildings occupied by one family" were allowed. In the subsequent decades, periodic downzoning expanded the extent of single-dwelling zoning into neighborhoods that previously allowed a mix of housing types. For just over a century, zoning in Seattle has limited access to many neighborhoods by prohibiting lower-cost housing forms, like apartments, thus raising the financial bar to afford housing and reinforcing racial segregation since people of color have disproportionately lower incomes and less wealth.

Furthering this pattern of exclusion were racially restrictive covenants, the use of which arose in response to the Supreme Court's ruling on municipal racial zoning. Racial covenants were enforceable contract language written into deeds, plats, and homeowners association bylaws that restricted the sale and use of property based on someone's race, ethnicity, and religion. As some residential areas began to diversify in the 1910s, the use of covenants in Seattle and surrounding cities became widespread, especially after the Supreme Court validated their use in 1926. Many neighborhoods prohibited the sale or occupancy of property to Asian Americans, Jewish people, Black people, or anyone "other than one of the White or Caucasian race."[17] One such covenant for the Windermere neighborhood said "No person or persons of Asiatic, African or Negro blood, lineage or extraction, shall be permitted to occupy a portion of said property, or any building thereon; except domestic servant or servants may be actually and in good faith employed by white occupants of such premises."[18] Figure A-37 further provides example text of racially restrictive

[14] Christopher Silver. "The Racial Origins of Zoning in American Cities." https://www.asu.edu/courses/aph294/total-readings/silver%20--%20racialoriginsofzoning.pdf

[15] Excerpt from "A Zoning Program for Seattle." Record Series 1651-02 Box 1, Folder 1. Seattle Municipal Archives.

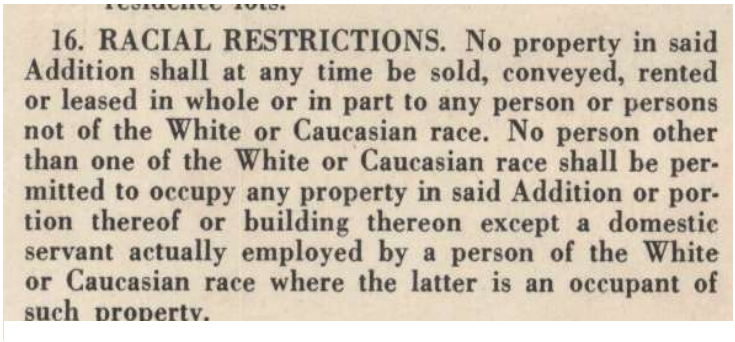
[16] https://www.epi.org/publication/making-ferguson/

[17] https://depts.washington.edu/civilr/covenants_BlueRidge.htm

[18] https://www.seattle.gov/documents/Departments/CityArchive/DDL/OpenHousing/covenant.pdf

covenants put on properties in the Blue Ridge neighborhood. This practice excluded people of color from much of Seattle and from the opportunity to pursue homeownership, which was becoming a more common pathway to stability and wealth in the 20th century.

Figure A-36
An example of racial restrictions recorded in 1938 in the subdivision covenants for the Blue Ridge neighborhood.



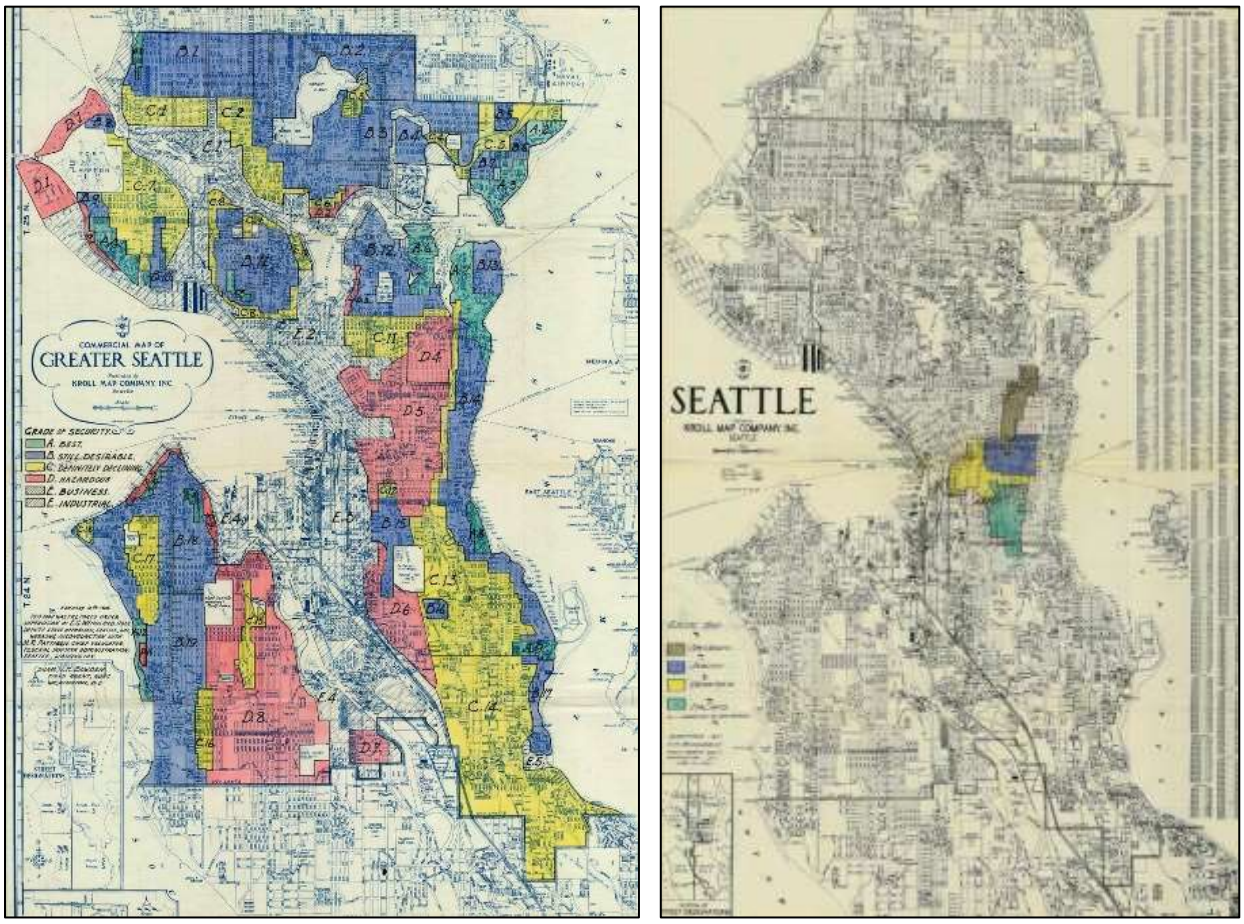
16. RACIAL RESTRICTIONS. No property in said Addition shall at any time be sold, conveyed, rented or leased in whole or in part to any person or persons not of the White or Caucasian race. No person other than one of the White or Caucasian race shall be permitted to occupy any property in said Addition or portion thereof or building thereon except a domestic servant actually employed by a person of the White or Caucasian race where the latter is an occupant of such property.

Source: https://depts.washington.edu/civilr/covenants_BlueRidge.htm

Alongside private deeds defining where people of color could *not* live, the Federal practice of redlining rendered them ineligible for government-backed home mortgages in the few areas where they could. As the U.S. emerged from the Great Depression, the National Housing Act was adopted in 1934 as part of the New Deal in an effort to boost housing stability and expand homeownership by underwriting and insuring home mortgages. To determine eligibility for those loans and delineate ideal areas for bank investment, the Home Owners Loan Corporation (HOLC), a Federal agency, created maps, shown in Figure A-38, that appraised the creditworthiness of entire neighborhoods based in part on their racial composition. Areas deemed too risky for mortgage lending were shaded in red or "redlined." Elsewhere, an area's high "grade of security" often explicitly referenced the presence of racial covenants. In Seattle, for example, the neighborhood of Windermere, shaded green, was touted as "protected…by racial restrictions," and the Central Area, outlined in red, deemed too risky for mortgage lending because "it is the Negro area of Seattle" and "composed of mixed nationalities."[19]

[19] https://dsl.richmond.edu/panorama/redlining/#loc=5/39.1/-94.58

Figure A-37
Home Owners Loan Corporation (HOLC) maps of Seattle



Informal practices and unwritten rules also contributed to housing discrimination. Real estate agents typically didn't show houses in predominantly white neighborhoods to people of color, and, even if they did, purchasing that housing was difficult for a buyer of color.[20] Discrimination in the sale or rental of housing was legal until Congress passed the Fair Housing Act in 1968. But earlier in the decade, local discussions had begun of a potential City ordinance prohibiting housing discrimination. In 1963, Seattle's newly created Human Rights Commission drafted an open housing ordinance with criminal penalties for acts of housing discrimination on the basis of race, ethnic origin, or creed. The City Council referred the legislation to a public vote. Opponents organized and advertised heavily, and in March 1964 the measure failed two-to-one. Seattle eventually adopted

[20] https://www.seattle.gov/cityarchives/exhibits-and-education/online-exhibits/seattle-open-housing-campaign

Open Housing legislation in 1968, extending its protections against discrimination first in 1975 and as recently as 2017 to other identities and groups.

In the decades after World War II, the government subsidized suburban development with housing finance and highway systems that disproportionately benefited white middle class and affluent households. When banks applied for government insurance on prospective loan for subdivision development, the Federal Housing Administration (FHA) pointed appraisers to its *Underwriting Manual*, which contained a "whites-only" provision that ensured none of the homes could be sold to people of color. This made racial segregation an official requirement of the federal mortgage insurance program and deprived people of color of the opportunity to own a home and build and pass on wealth.[21] In recent decades, interest in urban neighborhoods close to prosperous regional job centers has risen among higher-income households. Increased demand for housing has made many underinvested, previously redlined areas too expensive for existing residents of color who had historically been prohibited from living anywhere else.

The legacy of these practices persists today, perhaps most notably in the lasting racial segregation that exists across Seattle neighborhoods and in Seattle's racial wealth gap. Today, the HOLC's highest-graded Seattle neighborhoods remain disproportionately white, restrictively zoned, and characterized by high-cost detached housing. The percentage of Black households with zero net worth in Seattle is almost twice that of white households.[22] Homeownership remains one of the starkest measures of racial disparity in housing in Seattle: while roughly half of white households own their home, only about one-quarter of Native American households and one-quarter of Black households do.[23] As the primary way people accumulate and pass on wealth in the U.S., this homeownership gap reflects both the history of public- and private-sector racism in housing and the ongoing escalation of home prices and income inequality in our region.

The City has a statutory mandate under the 1968 federal Fair Housing Act to affirmatively further fair housing. This entails taking productive, meaningful actions to overcome historical patterns of segregation, promote fair housing choice, eliminate disparities in opportunities, and foster inclusive communities free from discrimination.

[21] Rothstein, 2017.

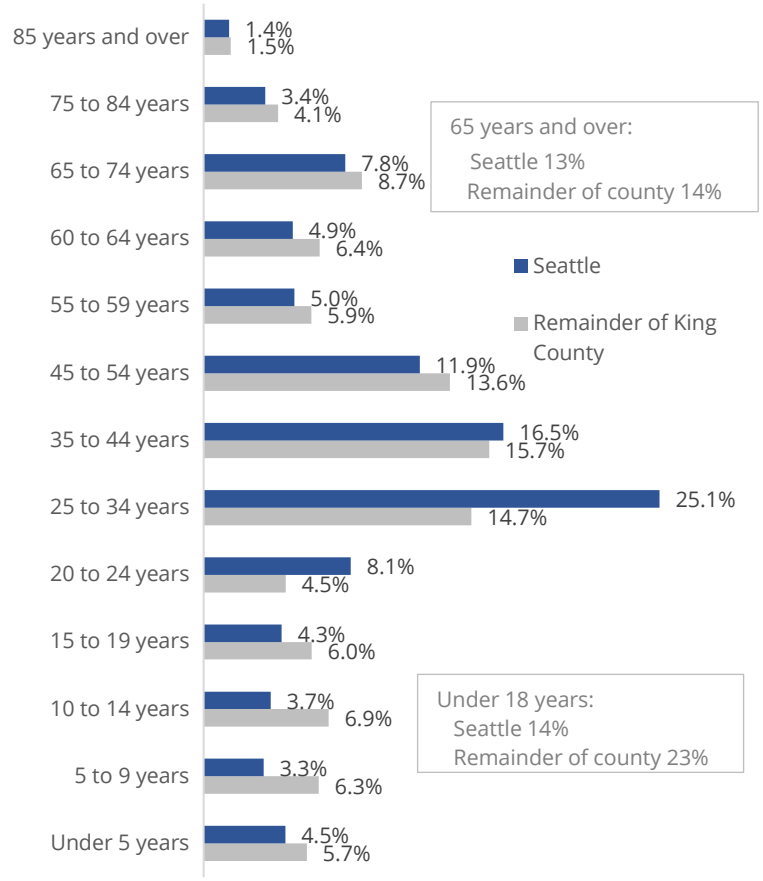
[22] https://www.historylink.org/File/21296; https://prosperitynow.org/sites/default/files/Racial%20Wealth%20Divide_%20Profile_Seattle_FINAL_3.2.21.pdf

[23] CHAS data based on 2015-2019 ACS.

Population Characteristics and Trends

This section summarizes basic demographic characteristics and trends in Seattle using data from the U.S. Census Bureau and the Washington State Office of Financial Management (OFM). decennial census data and ACS estimates.[24] We also include comparisons with demographic patterns and trends in the remainder of King County.

Figure A-38
Population Age Distribution
Seattle and Remainder of King County, 2021



Source: ACS 2021 1-Year Estimates, U.S. Census Bureau.
Notes: ACS estimates based on a sample and carry margins of error.

Age Distribution

As shown in Figure A-39, the shares of Seattle residents who are in middle- and older-adult age groups (38% ages 35-64, and 13% ages 65+) are fairly similar to the shares in the remainder of King County. In both Seattle and the remainder of King County, adults ages 35 to 65 outnumber both younger adults and older adults.

The biggest differences in the age composition of Seattle and the remainder of King County are found when looking at the shares of young adult groups, which are much larger in Seattle, and the shares of children and youth which are much smaller in Seattle.

[24] For many of these analyses the decennial census would normally be preferred over the sample-based ACS. However, at the time we are preparing these analyses for this draft of the Housing Appendix, the topics and detail available from the decennial census are very limited. We are planning to replace the 2021 1-year ACS estimates used to describe age composition with data from the 2020 Census for the final version of the Housing Appendix.

SEATTLE'S CONCENTRATION OF YOUNG ADULTS

Relative to many other central cities in the U.S., Seattle has an especially high concentration of residents ages 25 to 34. A quarter of all Seattleites belong to this age group compared to 15 percent in the remainder of King County,

This reflects the city's strong job opportunities, graduate-level educational institutions, and recreational offerings. A comparison of the 2021 ACS estimates with estimates collected 10 years prior suggests that the 25-34 age group grew at roughly twice the rate of Seattle's overall population.

A GROWING POPULATION AGE 65 AND OVER

The population of adults aged 65 and over also grew very quickly, with the 65-74 segment growing the fastest of all age groups. Between 2011 and 2021 the number of Seattle residents ages 65 to 74 increased by nearly one half, and by over one half in the balance of the county.

OFM forecasts that the population 65 and older in King County will grow by nearly 75 percent between 2022 and 2045.[25] Applying this rate to Seattle would see Seattle's current population of about 92,000 adults 65 and older rise to more than 160,000 by 2045. Even if the population of adults aged 65 and over grows somewhat more slowly in Seattle than in the remainder of King County, this will represent a dramatic increase. Furthermore, the underlying trend in the aging of the baby boom generation will drive substantial increases in the numbers and shares of older adults 75 and over.

A PROPORTIONALLY SMALL BUT GROWING CHILD POPULATION

Figure A-40 shows estimates for the child population for both Seattle and remainder of King County from the last two decennial censuses.[26]

The 2020 Census counted nearly 107,000 children under 18 residing in Seattle.[27] Although Seattle's child population increased each of the last three decades, it did so at a slower pace than Seattle's overall population. By 2020, the share of Seattle's population under 18 years of age had declined to 14 percent, which has Seattle continuing to rank near the bottom among large cities. In 2020, San Francisco was the only large city in the U.S. where children were a lower share of the population than in Seattle. High housing costs are one of the drivers associated with the low percentages of children in Seattle and many other U.S. cities with very low proportions of children. The relative dearth of family size units in most forms of housing besides single-family residences and the

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[25] Growth Management Act population projections for counties: 2020 to 2050 | Office of Financial Management (wa.gov)

[26] At the time we are writing this, the only age breakouts available from the 2020 Census are for the population under 18 and the population 18 and older. Using the 2020 Census data for the population under 18 population avoids the margins of error associated with sample-based ACS estimates and facilitates comparison with previous decennial data and enable examination of long-term trends.

[27] A recent report Annie E. Casey Foundation includes analysis of how the child population has changed in states and large cities throughout the U.S. Analysis of the 100 cities with the largest child populations found Seattle ranking 9th in both the highest numerical and the highest percent increases from 2010 to 2020 in the child population. See aecf-changingchildpop-2023.pdf.

domination of zero-bedroom and one-bedroom units in recent housing construction are key factors constraining the number of children in Seattle.

While the under-18 share of the population in the remainder of King County has also been declining, at 23 percent it remains much higher than in Seattle.

Figure A-39
Child Population, Seattle and Remainder of King County
Decennial Census Estimates from 1990 to 2020

	Seattle				King County			
	1990	2000	2010	2020	1990	2000	2010	2020
Population under 18 years of age	84,930	87,827	93,513	106,841	256,141	302,819	319,989	349,364
People under 18 as a share of the population	16%	16%	15%	14%	26%	26%	24%	23%
		1990-2000	2000-2010	2010-2020		1990-2000	2000-2010	2010-2020
Change in number of people under 18		2,897	5,686	13,328		46,678	17,170	29,375
Rate of change in population under 18		3%	6%	14%		18%	6%	9%

Source: Decennial census estimates, U.S. Census Bureau.

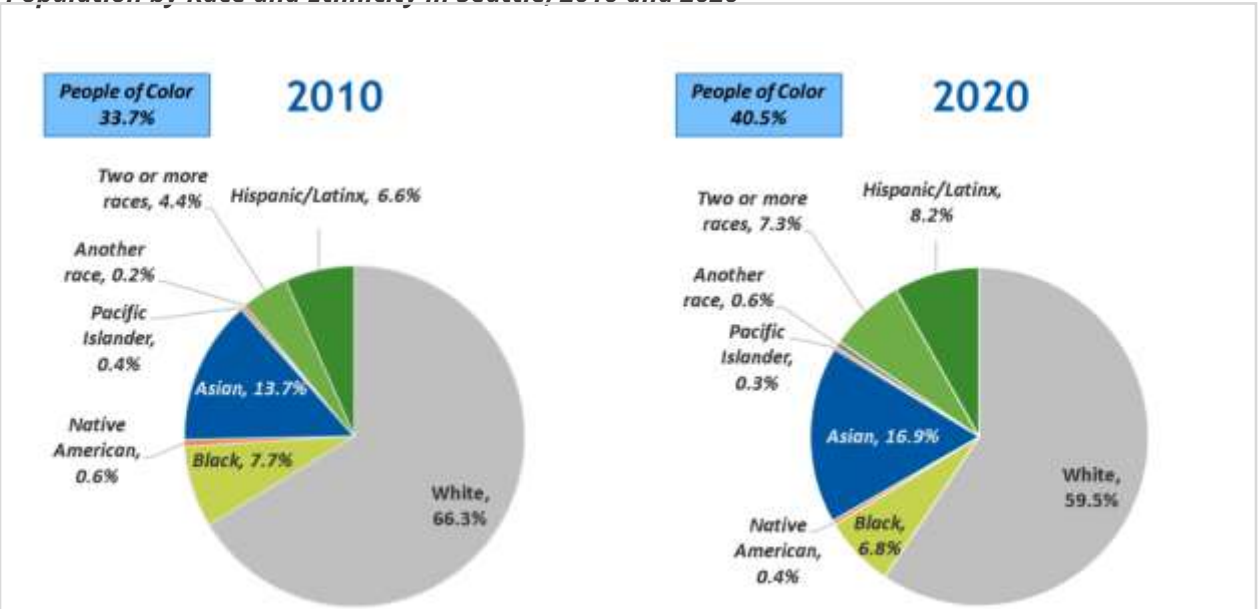
Race, Ethnicity, and Related Demographics

Based on 2020 Census estimates, four out of every 10 Seattle residents are people of color. As reflected in the pair of pie charts in Figure A-41, this is a substantial increase compared with 2010, when people of color comprised slightly more than one third of Seattle's population. **People of color include persons whose race and ethnicity are other than single-race white, non-Hispanic.**[28]

Asians comprise the largest group of color. The next two most populous groups of color are persons of Hispanic/Latino ethnicity (8.2%) and persons of Black or African American race (6.8%). About seven percent of Seattle residents are multiracial.

[28] Existing federal standards for reporting race and ethnicity treat race and Hispanic/Latino ethnicity as separate concepts; Hispanic/Latino persons may be of any race. In this appendix, unless otherwise noted, persons who are Hispanic/Latino are grouped as Hispanic/Latino, while the racial categories reported are comprised of people who are not Hispanic or Latino.

Figure A-40
Population by Race and Ethnicity in Seattle, 2010 and 2020



Sources: 2010 and 2020 decennial census estimates, U.S. Census Bureau.

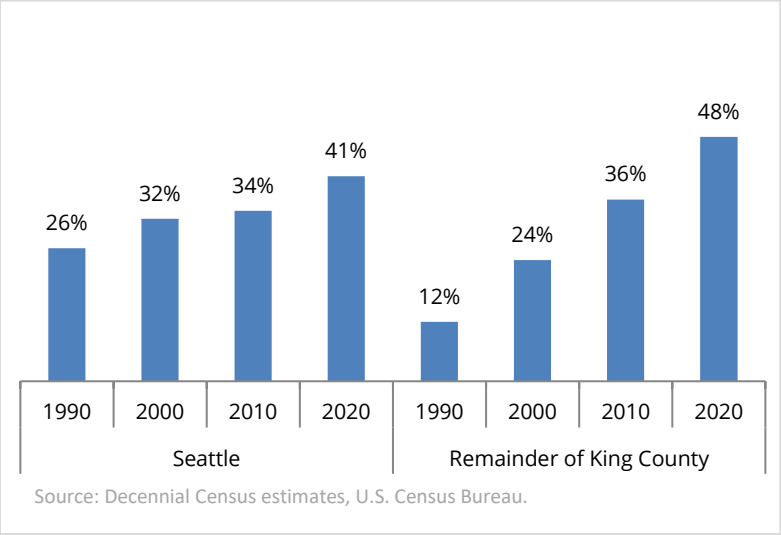
Between 2010 and 2020, the population of color in Seattle rose by nearly 46 percent while the number of white residents in the city increased by only 9 percent, as shown in Figure A-42.

Figure A-41
Racial and Ethnic Composition of Seattle Population

Racial and Ethnic Composition of Seattle Population		
	2010 to 2020 Growth	2020 Population
Total population	21.1%	737,015
People of Color	45.7%	298,847
Black	6.6%	50,234
Native American	-15.8%	3,268
Asian	49.3%	124,696
Pacific Islander	-13.6%	1,941
Another race	205.5%	4,473
Two or more races	102.4%	53,672
Hispanic/Latino, of any race	50.2%	60,563
White	8.6%	438,168
Sources: Decennial census estimates, U.S. Census Bureau.		

Multiracial people, Asians, and people of Hispanic/Latino ethnicity had the fastest growing populations in Seattle. In contrast, Seattle's Black population increased by only 7 percent, which was even slower than the growth among white people during the same period. Furthermore, decennial census tallies for the smallest racial groups in the city—Pacific Islander and Native Americans—fell between 2010 and 2020.

Figure A-42
Persons of Color as Share of Total Population

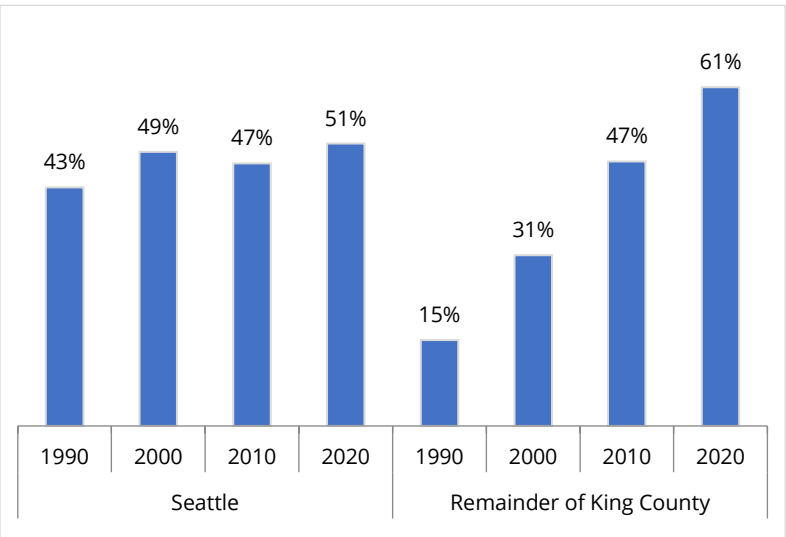


Source: Decennial Census estimates, U.S. Census Bureau.

While people of color have been increasing as a share of the population, the increase in Seattle has been slower than in the rest of King County. This trend is evident over the last several decades as shown in Figure A-43.

The variation between Seattle and the remainder of King County in the trend toward racial diversification is more dramatic for the population under 18. The share of the child population who are persons of color increased rapidly in King County outside Seattle, but nearly plateaued in Seattle over the past 2 decades as shown in Figure A-44.

Figure A-43
Children of Color as Share of Population Under 18 Years of Age



Source: Decennial Census estimates, U.S. Census Bureau.

Figure A-45 shows growth rates between 2010 and 2020 by race and ethnicity for Seattle's child population compared with the city's adult population. Broadly speaking, for both children and—especially—for adults, rates of population growth were higher for people of color than for whites. There was, however, a great deal of variation in patterns between groups of color. Increases in the multi-racial population and the Hispanic/Latino population were big drivers of both child and adult population growth. In contrast, the number of Asian children in Seattle declined between 2010 and 2020 even as the number of Asian adults in the city increased by over 50 percent.

Other racial groups with very small or negative child population growth rates between 2010 and 2020 include Blacks, Native Americans, and Pacific Islanders.

The lower rates of increase in Seattle compared to King County for children of color, suggest that households with children are finding it more difficult (or less beneficial) to move to or stay in Seattle.

As discussed elsewhere in this appendix, some key factors influencing these patterns include high housing costs in Seattle coupled with the relatively low and declining share of housing units in Seattle that are large enough to accommodate families with children.

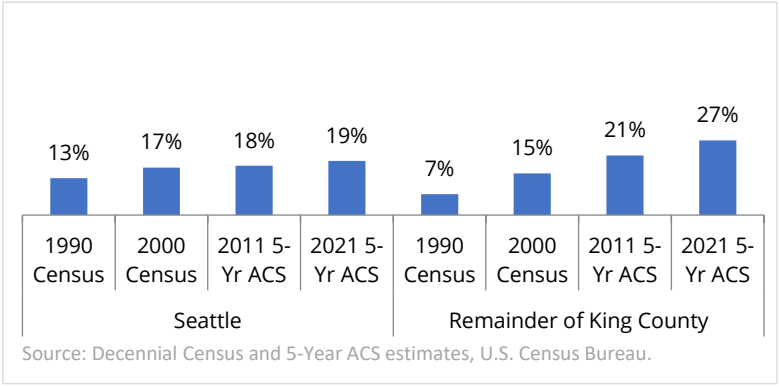
Figure A-44
Growth in Seattle's Child and Adult Populations by Race & Ethnicity, 2010 to 2020

	Growth in Child Population	Growth in Adult Population
Population in age group:	14.3%	22.3%
People of Color:	22.8%	52.0%
Black	1.8%	8.1%
Native American	-9.5%	-16.7%
Asian	-1.5%	57.6%
Pacific Islander	-28.2%	-9.3%
Two or more races	74.5%	118.1%
Hispanic/Latino, of any race	26.9%	57.8%
White	6.7%	8.8%

Sources: Decennial census estimates, U.S. Census Bureau.

Other patterns in the data suggest that an important driver of the increase in Seattle's population of color has been young adults coming from other areas of the state, U.S., and world, for educational and job opportunities. This includes, but is not limited to, persons in South Asian and East Asian racial groups whom ACS "Selected Population Tables" indicate are more likely to have moved recently to Seattle and King County from areas outside of King County.[29]

Figure A-45
Foreign-Born Population As Share of Total Population



Source: Decennial Census and 5-Year ACS estimates, U.S. Census Bureau.

Estimates from the ACS indicate that about 19 percent of Seattle's population immigrated to the U.S. from another county. In a pattern similar to that seen for the population of color, the foreign-born share of Seattle's population has increased more slowly than in the remainder of King County as shown in Figure A-46. As seen with the population of color, immigrants are now a larger share of residents in King County outside of Seattle than inside Seattle.

[29] ACS 2021 5-Year Selected Population Detail Table B07003: Geographical Mobility in the Past Year.

Household Characteristics and Trends

This section examines basic household characteristics and trends impacting housing needs. The subsequent section analyzes differences by race and ethnicity. These analyses use data from the ACS, including a special set of ACS tabulations that HUD obtains from Census Bureau and publishes to help local communities evaluate their housing needs and supply – the Consolidated Housing Affordability Strategy data, or "CHAS" data for short.

CHAS Data

CHAS tabulations from ACS 5-year estimates provide a key source for analyses in Housing Appendix regarding the characteristics of households, the housing challenges they experience, and the affordability of the city's housing stock. We use the CHAS to analyze these topics for Seattle as a whole and to examine patterns between neighborhoods.

The CHAS data, like other ACS data, provide a broadly representative picture of a community's households and housing supply. These data do not, however, provide information on housing assistance that some households receive, nor do these data allow us to distinguish between subsidized housing and market-provided housing.

There is a significant lag between data collection and publication of CHAS data; the 2019 5-year CHAS data were the most recent available at the time of our analysis. For selected topics, we compare findings from these CHAS data with those from older CHAS data that we used to inform the previous major update of the Comprehensive Plan.

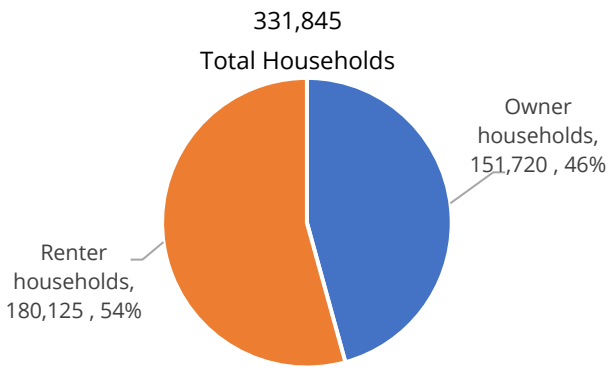
As sample-based estimates, the CHAS estimates carry margins of error and may be unreliable for small groups of households and small areas.

As a companion to the Housing Appendix, we provide a set of Supplemental Tables on the City's One Seattle Plan webpage for readers who wish to examine CHAS data in more detail.

Total Households

The 2019 5-year CHAS estimates, which represent a weighted average of the 5-year analysis period, reflect approximately 331,845 total households in Seattle. This is lower than the 372,188 households that the state Office of Financial Management estimates reside in Seattle as of April 1, 2023.

Figure A-46
Seattle Households by Tenure (Owner/Renter); 2019 5-Year Estimates

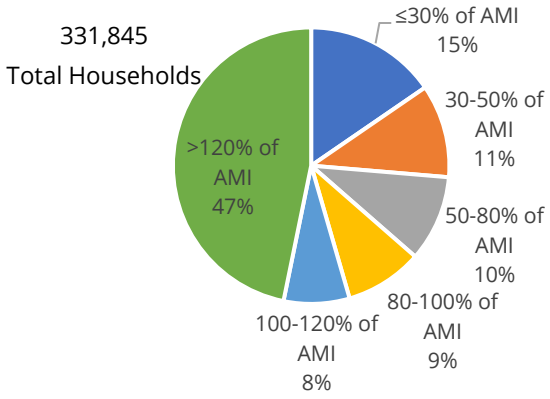


Source: CHAS tabulations of ACS 2015-2019 5-year estimates, U.S. Census Bureau and HUD.

Tenure

Tenure refers to whether a household owns or rents the housing unit in which they live. As shown in Figure A-47, approximately 54 percent of households in Seattle are renters while 46 percent of the households in the city own the home in which they reside.

Figure A-47
Seattle Household Income Distribution; 2019 5-Year Estimates



Source: CHAS tabulations of ACS 2015-2019 5-year estimates, U.S. Census Bureau and HUD.

Household Income Distribution

The distribution of incomes among Seattle households is shown in Figure A-48.

About 36 percent of households have incomes at or below the low-income threshold of 80% of area median income (AMI). Cumulatively, about 53 percent of Seattle's households have incomes at or below 120% of AMI:

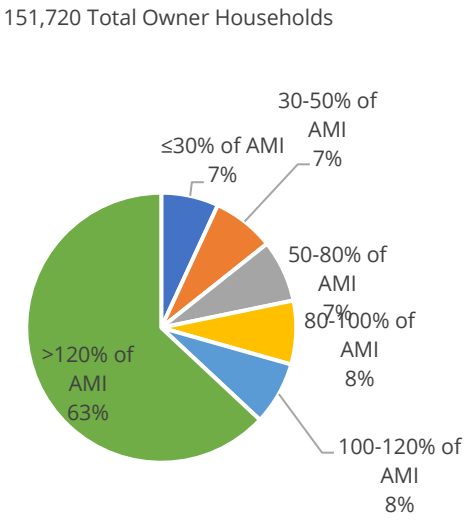
a. 15 percent have extremely low incomes (≤30% of AMI),

b. 11 percent have very low incomes (30-50% of AMI), and

c. 10 percent have low incomes (50-80% of AMI).

Figure A-34, provided in the Housing Needs Projection section of this Appendix, shows incomes associated with various AMI levels. AMI thresholds for Seattle are based on incomes in King and Snohomish counties combined. As shown in that table, 100% of AMI in 2023 is about $146,000 for a household of four. (For 2019, 100% of AMI for a four-person household was $108,600.)[30]

Figure A-48
Seattle Owner Household Income Distribution; 2019 5-Year Estimates



Source: CHAS tabulations of ACS 2015-2019 5-year estimates, U.S. Census Bureau and HUD.

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HOUSEHOLD INCOME DISTRIBUTION BY TENURE

The distribution of household incomes varies by tenure as shown in Figures A-49 and A-50. Compared with owner households, renter households are much more likely to have incomes at or below 80 percent of AMI, with almost half of renter households in this group. Meanwhile, only about one in five owner households have incomes this low.

Contrasts in income patterns between renters and owners are pronounced for the lowest and highest income categories:

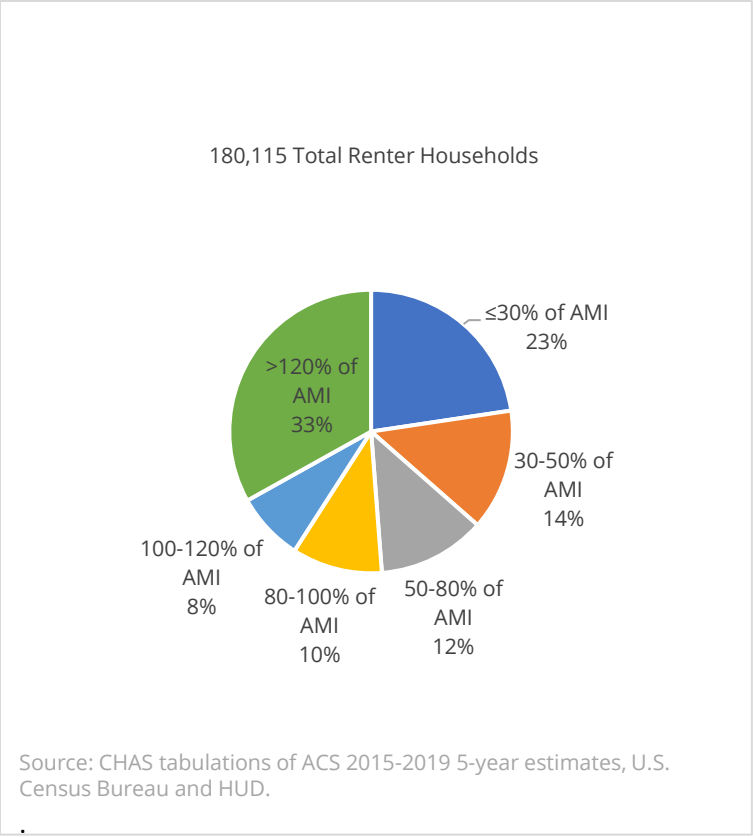
[30] HUD publishes income limits for federally funded programs on their website. To identify income limits for an area, HUD first takes the median family income estimate from the ACS for all area families and adjusts that using an inflation projection (because the income limits for each year must be published before ACS data are available for that year are available.) HUD designates the area median family income as applying to four-person families in the area, then makes a series of further adjustments for household size and AMI percentages using administratively determined formulas.

The income thresholds specified for the CHAS tabulations do not require applying an inflation projection and therefore vary somewhat official income limits., HUD does not publish the CHAS income thresholds but describes the methodology for producing them in "Measuring Housing Affordability," by Paul Joice, HUD, *Cityscape: A Journal of Policy Development and Research*, Volume 16, Number 1, 2014.

Both the federal income limits and the CHAS income thresholds can vary from actual income patterns within communities.

- 22 percent of renter households compared to 7 percent of owner households have incomes at or below 30% of AMI, while
- 33 percent of renter households compared to 63 percent of owner households have incomes above 120% of AMI.

Figure A-49
Seattle Renter Household Income Distribution; 2019 5-Year Estimates



Source: CHAS tabulations of ACS 2015-2019 5-year estimates, U.S. Census Bureau and HUD.

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TRENDS IN HOUSEHOLD INCOME DISTRIBUTION

To highlight trends in Seattle households' incomes over time, Figure A-51 compares estimates from the 2019 5-year CHAS with older data from the 2010 5-year CHAS.

Incomes in Seattle have become more polarized.

- This includes a substantial increase in the share of households who have high incomes (over 120% of AMI) coupled with a decrease in the share of households with incomes ranging from 50% of AMI to 120% of AMI.
- The biggest proportional decrease was in the 50-80% of AMI category. This was also the only income band with declines in the *number* of households. There was a net loss of nearly 5,000 households in this income band.

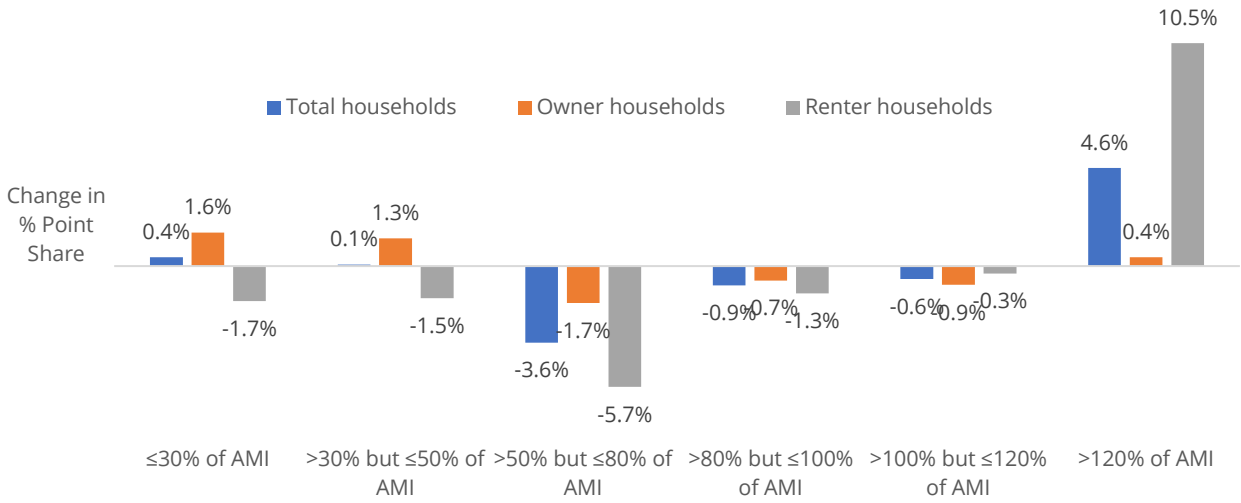
Several factors likely contributed to the polarization in Seattle incomes. These include growth in jobs in high-wage fields along with challenges faced by low- and moderate-income households, particularly households with incomes of 50-80% of AMI, in competing for housing with higher income households.

Changes in income distribution were driven mainly by shifts in the income profile of renter households.

- Notably, these shifts included a nearly 11 percentage point increase in the share of renter households with incomes above 120% of AMI—an increase that translates into a net addition of 27,0000 high-income renter households.
- There was also a sizeable decline in the share and number of renter households with incomes of 50-80% of AMI.

Although there were declines in the proportions of renter households in the lowest income categories, the city saw increases in the numbers of these renter households, with the net addition of roughly 6,000 renter households with incomes of 0-30% of AMI and 3,000 renter households with incomes of 30-50% of AMI. Seattle's investment in subsidized housing was likely a factor keeping the number of Seattle renter households with extremely and very low incomes from decreasing in the face of extreme competition and supply challenges these households face in the housing market.

Figure A-50
Change in Seattle Household Income Distribution
2010 5-Year Period to 2019 5-Year Period



Source: CHAS tabulations of 2006-2010 and 2015-2019 ACS 5-year estimates, U.S. Census Bureau and HUD.

Housing Cost Burden

A broadly used standard considers housing costs that consume 30 percent or less of a household's income to be affordable. Based on this standard, HUD considers households cost-burdened if they spend more than 30 percent of their income on housing costs and severely cost-burdened if they spend more than 50 percent.

Housing is the single largest expense for most households. Households with unaffordable housing costs, particularly those in low-income categories, may not have enough money left over to pay for other essential needs or to make investments that can improve their long-term economic well-being.

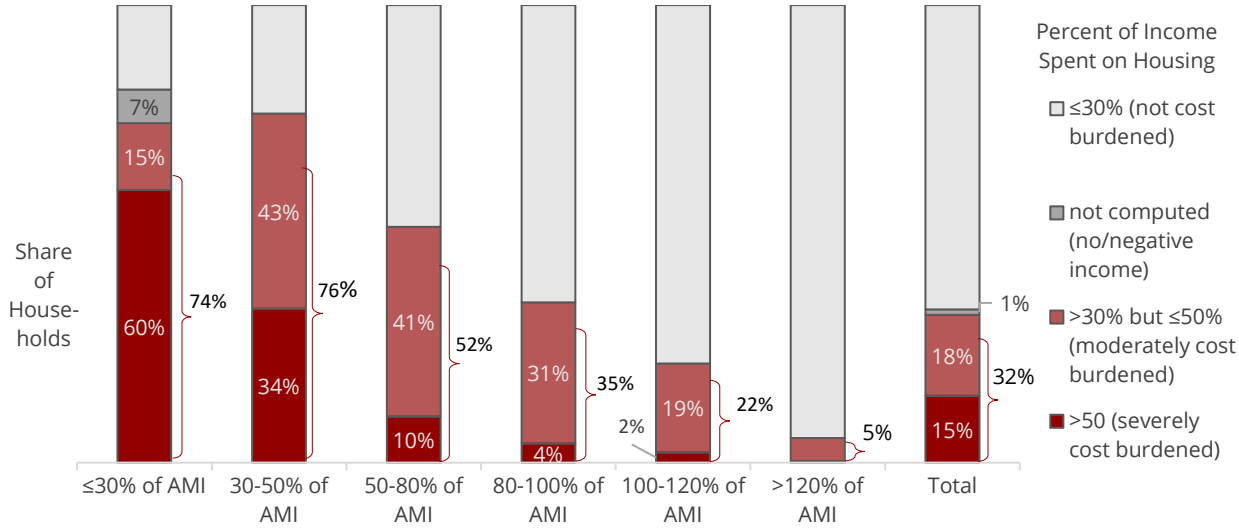
An estimated 32 percent of all households in Seattle are cost burdened. That translates into more than 107,000 Seattle households shouldering unaffordable housing costs. Of these, close to 50,000 households are severely cost-burdened and at especially high risk of housing insecurity.

COST BURDEN BY HOUSEHOLD INCOME CATEGORY

As Figure A-52 shows, low-income households are much more likely to shoulder unaffordable housing costs than are moderate-income households, who in turn are more likely to be cost burdened than higher-income housholds.

- Roughly three-quarters of households in extremely low (0–30% of AMI) and very low (30–50% of AMI) income categories are cost burdened. Six in ten households with extremely low incomes, and more than a third of households with very low incomes, spend more than half of their income on housing. Severely cost-burdened households in these very low- and extremely low-income bands are especially vulnerable to displacement and homelessness.
- Although the prevalence of severe cost burden drops substantially for subsequent income categories, more than half of 50–80% AMI households are cost burdened.
- Substantial fractions of households are cost burdened even within income ranges between 80% and 120% of AMI: 1 in 3 households in the 80–100% of AMI band and approximately 2 in 10 households in the 100–120% of AMI band are cost burdened.

Figure A-51
Prevalence of Housing Cost Burden by Household Income Category
2015-2019 5-Year Period



Source: CHAS tabulation of 2015-2019 ACS 5-year estimates, U.S. Census Bureau and HUD.
Notes: The Census Bureau and HUD do not calculate the percentage of income spent on housing for households with zero or negative income.

COST BURDEN BY HOUSEHOLD INCOME CATEGORY AND TENURE

In general, renter households are substantially more likely than owner households to be housing cost burdened.

- About 40 percent of renter households are cost burdened, while a lower but still sizable 23 percent of owner households are cost burdened.
- Roughly 19 percent of renter households are shouldering severe cost burden compared to 10 percent of owner households.

These differences are largely correlated with the facts that a) renter households generally have lower incomes than owner households and b) lower income households are more likely to be cost burdened. Furthermore, in terms of sheer numbers, the largest groups of cost-burdened households are found among low-income renters. More than half of all cost-burdened households in the city are renter households with incomes no higher than 80% of AMI. Three-quarters of severely cost burdened households are renters with incomes at or below 50% of AMI.

That said, owner households within some income categories are as likely or more likely to be cost burdened than renter households within those income categories. This is the case for owners with incomes at or below 30% of AMI and owners in the 80-120% of AMI income categories. The former category may include fixed-income owner households struggling with property taxes while the latter may largely reflect households who stretched to become homeowners.

TRENDS IN HOUSING COST BURDEN

As previously described, the CHAS data set for the 2015-2019 5-year period shows roughly 32 percent of Seattle households as cost burdened; this is lower than the 38 percent share estimated based on the CHAS data for the 2006-2010 5-year period. This decline was driven primarily by a reduction in cost burden among owner households with incomes of 50% of AMI and above. Contributing factors likely included the opportunity between 2010 and 2019 that many had to refinance or secure new mortgages with interest rates lower than historical averages and possibly the tighter credit standards that existed in the wake of the Great Recession.[31] (The trend toward lower prevalence of cost burden may change as a result of more recent increases in interest rates.)

In comparison, the prevalence of cost burden among renter households decreased among those with incomes no higher than 30% of AMI but rose for those with incomes between 50% and 100% of AMI. The reduced prevalence of cost burden among extremely low-income renter households may stem from help that programs provided to address housing needs among the lowest income

[31] See article in the *Seattle Times*, "The share of 'cost-burdened' Seattle households has fallen. Here's why," Gene Balk, Oct. 14, 2022. Additional references: "A Decade After the Recession, Housing Costs Ease for Homeowners," Christopher Mazur, U.S. Census Bureau, November 04, 2019; and U.S. Housing Cost Burden Declines Among Homeowners but Remains High for Renters, Matthew Martinez and Mark Mather, Population Resource Bureau, April 15, 2022

households as well as reduced unemployment rates associated with recovery from the Great Recession.

Despite declines in the *prevalence* of cost burden between these periods, the estimated *number of households* experiencing cost burden increased: this included an increase of roughly 1,600 owner households with cost burden and a substantial increase of about 11,500 renter households with cost burden.

Overcrowding

The CHAS data also allow us to look at the prevalence of overcrowding in homes. HUD defines overcrowding as more than one person per room.[32]

Overcrowded housing has long been associated with increased risks of infection from communicable disease. More recently, researchers found that living in overcrowded housing likely increased the risks of COVID-19 mortality.[33] Harmful impacts of overcrowding are not limited to physical health. For example, studies have found that children residing in crowded housing experience more social conflicts at home and worse educational outcomes.[34]

About 3.5 percent of all Seattle households live in overcrowded housing. However, rates of overcrowding vary by tenure, household type, and income. Living in overcrowded conditions is more common among renter households (5.5% overcrowded) than among owner households (1.2% overcrowded). An estimated 19 percent of Seattle families with incomes at or below 80% of AMI are in overcrowded housing. The rate of overcrowding is also relatively high for households comprised of multiple families; an estimated 16 percent of such households in Seattle are in overcrowded dwellings.[35]

Overcrowding is one signal that the market is not providing enough adequately sized units that individuals and families can afford. However, these data provide an incomplete picture of such gaps given that households may avoid overcrowding within a city that has a shortage of affordable and adequately sized units by locating elsewhere in the region.

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[32] The rooms accounted for in this measure include living rooms, dining rooms, kitchens, bedrooms, and other types of rooms such as finished recreation rooms; excluded are bathrooms, hallways, open porches, and some other spaces.

[33] Varshney K, Glodjo T, Adalbert J. Overcrowded housing increases risk for COVID-19 mortality: an ecological study. BMC Res Notes. 2022 Apr 5;15(1):126. doi: 10.1186/s13104-022-06015-1. PMID: 35382869; PMCID: PMC8981184.

[34] The California Department of Public Health's Office of Health Equity summarizes evidence on the adverse effects of overcrowding in the this document from their Healthy Communities Data and Indicators Project.

[35] Households with multiple families can be comprised of either a family and at least one subfamily or more than one family. Given the relatively small number of multiple-family households in Seattle and the limited sample upon which CHAS estimates are based, further disaggregation of estimates for this group would likely be unreliable.

Household Disparities by Race and Ethnicity

This section of the Housing Appendix examines disparities by race and ethnicity based primarily on 5-year CHAS data for the period 2015-2019. This analysis is foundational to the City's goal of achieving more equitable housing outcomes through the Comprehensive Plan update.

An important consideration for viewing these data is that the broad racial and ethnic categories in the CHAS tabulations can mask significant differences in housing needs within these groups. Notably, while incomes and housing-related wellbeing generally show Asians faring better than other groups of color, more disaggregated data show that Vietnamese and other Southeast Asian subpopulations tend to be more disadvantaged on these indicators.[36]

Another consideration is that the CHAS data presented predate the COVID-19 pandemic, which exacerbated affordable housing struggles. The Census Bureau's Household Pulse Survey responses in the Seattle metro area show households of color, households with lower incomes, LGBTQ persons, and disabled persons disproportionately likely to have experienced associated reductions in earnings and difficulty making payments for rent and mortgages.[37]

Disparities in Homeownership Rates

As described in Seattle's Equitable Development Community Indicators Report,[38] owning a home is the most common way for households to build and pass on wealth. Although purchasing a home entails financial risk, homeownership generally tends to be associated with greater long term housing stability. For example, in gentrifying areas, homeowners are about half as likely to be displaced as are renters.[39]

Reduced chances for people of color to access and sustain homeownership due to institutionalized racism and discrimination have contributed to an intergenerational legacy and ongoing cycle of diminished economic prospects for these members of our community. Programs to make purchasing a home possible for low-income households can help interrupt such intergenerational cycles and put families on paths to greater economic security. Affordable rental housing also plays a role in making homeownership ownership a possibility for a greater diversity of households as

[36] While not tailored for examining housing needs in the same way that CHAS tabulations are, the ACS Selected Population Tables and the American Indian and Alaska Native Tables include many socio-economic and housing tabulations iterated for more detailed population groups.

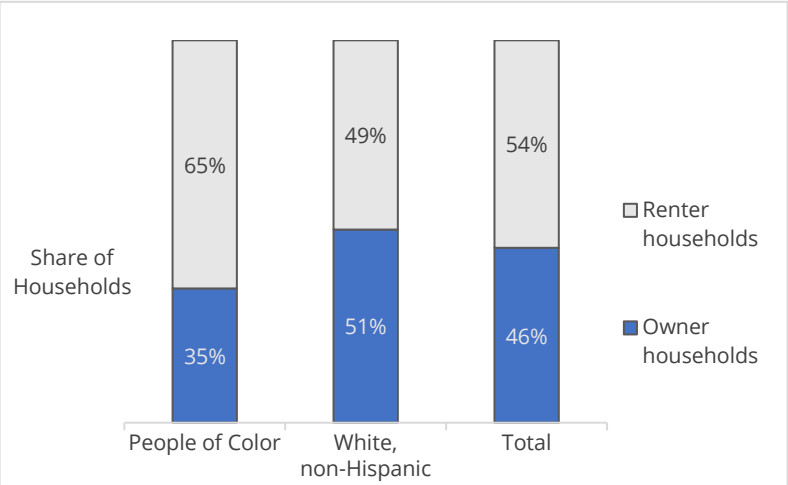
[37] Tracking COVID-19's Effects by Race and Ethnicity: Questionnaire One | Urban Institute; Economic, social, and overall health impacts dashboard on Housing security, Public Health—Seattle & King County.

[38] City of Seattle Office, Equitable Development Community Indicators Report, 2021. See pages 22 to 26 for analysis on homeownership.

[39] Martin, I. W., and K. Beck. 2018. Gentrification, property tax limitation, and displacement, *Urban Affairs Review*, *54*(1), 33-73.

people who are stretched to pay their rent will not be able to save for downpayment on purchase of a home.

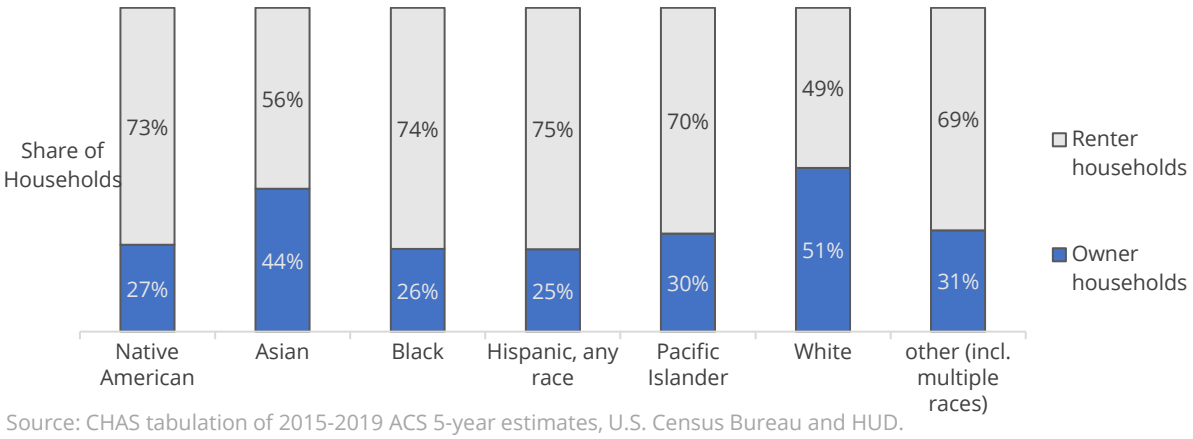
Figure A-52
Tenure by Race and Ethnicity of Householder; 2015-2019 5-Year Period



Source: CHAS tabulation of 2015-2019 ACS 5-year estimates, U.S. Census Bureau and HUD.

Homeownership is much less common for Seattle's households of color than for the city's white households. Figure A-53 shows that a little over a third of households of color living in Seattle own their home compared to slightly over half of white households.

Figure A-53
Tenure by Race and Ethnicity of Householder; 2015-2019 5-Year Period

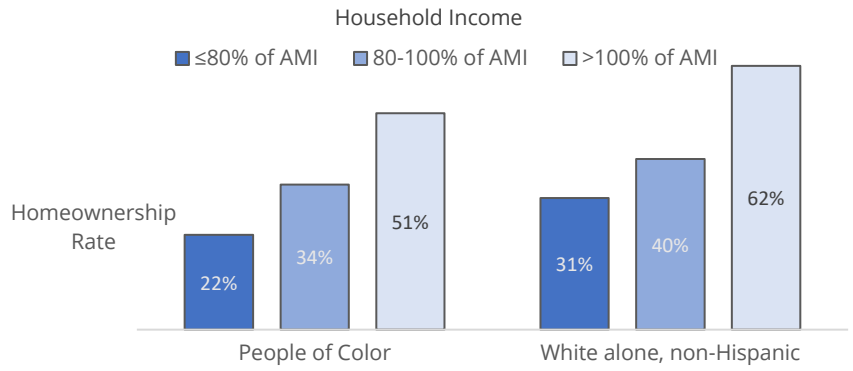


Source: CHAS tabulation of 2015-2019 ACS 5-year estimates, U.S. Census Bureau and HUD.
Notes:CHAS estimates are based on a sample and may be unreliable for small demographic groups including Native Americans and Pacific Islanders.

Owning the home in which one lives is uncommon for most groups of color. Figure A-54 shows that fewer than one-third of Hispanic/Latino, Native American, Black, and Pacific Islander householders in Seattle are estimated to own their home.[40]

As shown in Figure A-55, even when controlling for income, people of color are less likely to own their home. Household and generational wealth, which tends to be distributed even more inequitably than income, is a major driver in who can afford to purchase and maintain homeownership.

Figure A-54
Homeownership Rates by Household Income and Race/Ethnicity; 2015-2019 5-Year Period



Source: CHAS tabulation of 2015-2019 ACS 5-year estimates, U.S. Census Bureau and HUD.
Notes: Estimates are based on a sample and carry margins of error.

Homeownership rates among people of color have declined in Seattle over recent decades. Comparing estimates from the 1990 decennial Census and the 2019 5-Year CHAS data finds that homeownership rates in Seattle declined by roughly 5 percentage points for households of color but only by roughly 1 percentage point for white households. During this period, Seattle saw an especially steep decline in homeownership among Black households with the rate declining by roughly 11 percentage points (from 37 percent as estimated in the 1990 Census to 26 percent as estimated in the 2019 5-year CHAS dataset.[41]

[40] CHAS data (and other ACS data) for households categorizes the race and ethnicity of the household based on that of the householder. Other members of a household may not share the same racial and ethnic characteristics as the householder.

[41] Some caution is needed in comparing race and ethnicity crosstabulations between the 1990 Census and more recent Census Bureau surveys given that the Census Bureau questionnaires did not enable respondents to select multiple races until the year 2000. (For the more recent estimates reported, we group all multiracial persons, including persons who identified white as one of their races, as persons of color; this was not possible for the 1990 estimates.) That said the declines in homeownership rates for households of color and for Black households are so large that they dwarf the issues associated with comparability.

The long-term decline in the Black homeownership rate reflects both increasing shares of Seattle's Black residents who are immigrants with low homeownership rates and dramatic declines in the homeownership rates among U.S.-born Black householders. The decrease in Black homeownership in Seattle is also linked to broader trends in the U.S. including those from the lingering effects of the Great Recession's foreclosure crisis, continued discrimination in lending, rising student loan debts, and various barriers that confront would-be first-time buyers in expensive markets.[42] It is also likely the case that many Black homeowners have left Seattle to purchase homes or rent in communities outside of Seattle.[43]

Disparities in Household Income

Household income distribution in Seattle is marked by wide disparities by race and ethnicity despite Seattle's status as a major economic hub and generator of wealth for businesses and individuals in the region.

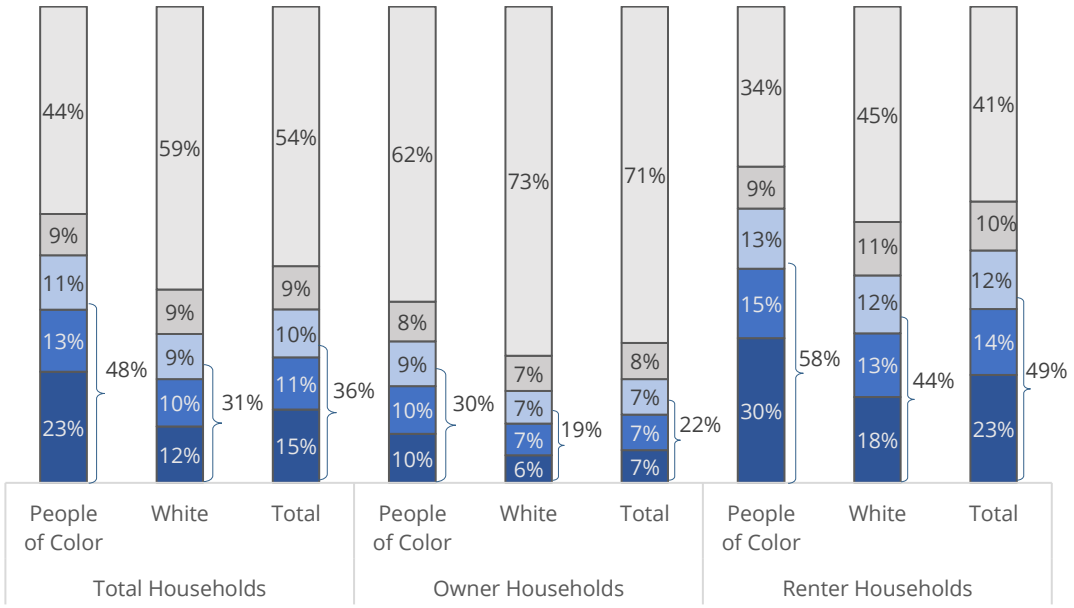
As shown in Figure A-56:

- Close to half of households of color have incomes at or below the 80% of AMI low-income threshold. In contrast, less than a third of white households have incomes below this threshold.
- At 30 percent, the proportion of owner households of color who have low incomes is substantially higher than the proportion of white owner households with low incomes.
- A sizeable majority (58 percent) of renter households of color are living with incomes no higher than 80% of AMI; the proportion of white renter households with incomes at or below 80% of AMI is not nearly as high but is still substantial (44 percent).

[42] City of Seattle OPCD, Equitable Development Community Indicators Report, 2021, p. 23; and "The 'heartbreaking' decrease in black homeownership," *Washington Post*, February 28, 2019.

[43] In the last three decades, the homeownership rate among Black households declined in both Seattle and the remainder of King County. Over the same period, the *number* of Black owner households decreased in Seattle but increased in the remainder of King County. The number of Black renter households also increased at a greater rate in the remainder of the county than in Seattle.

Figure A-55
Household Income Patterns by Tenure and Race/Ethnicity
2015-2019 5-Year Period

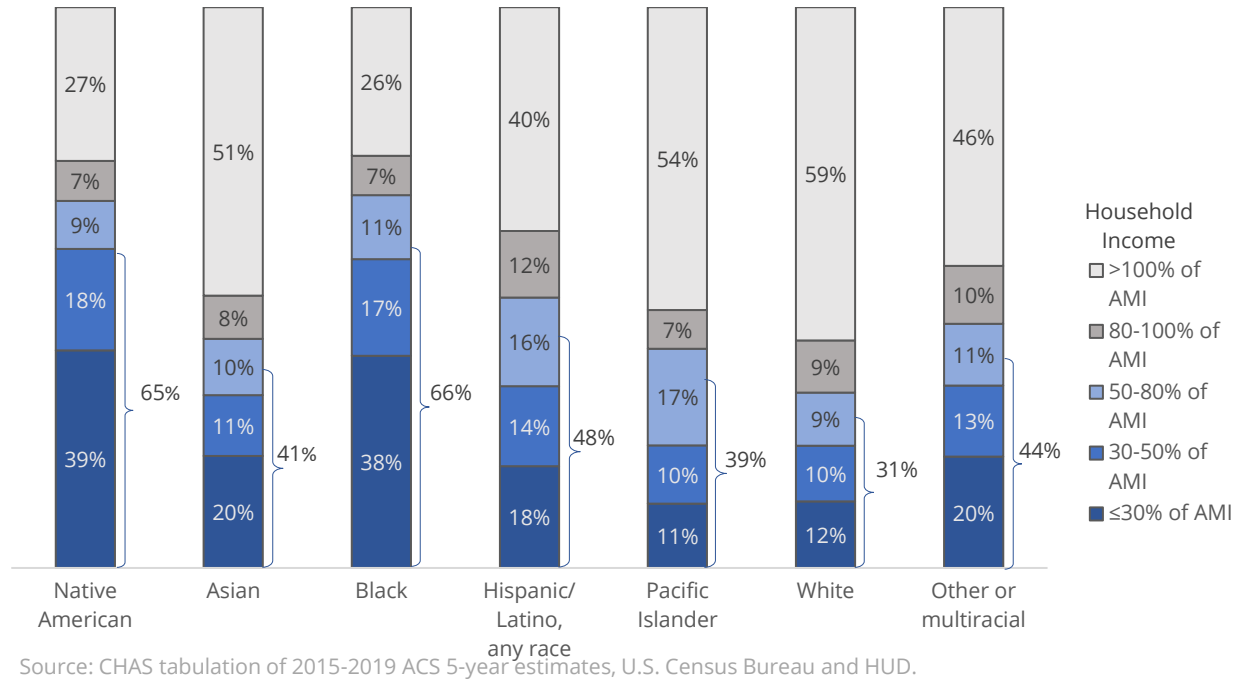


Source: CHAS tabulation of 2015-2019 ACS 5-year estimates, U.S. Census Bureau and HUD.
Notes: Estimates are based on a sample and carry margins of error.

The subsequent chart, Figure A-57, shows household income distribution for each of the racial and ethnic groups for which the CHAS data provides tabulations.

- The low-income share of households is greater among every group of color than it is among white households.
- Native American households and Black households are most likely to have low incomes, with close to two-thirds of both groups having incomes at or below 80% of AMI. Nearly half of Hispanic or Latino households have incomes this low.

Figure A-56
Household Income Patterns by Race/Ethnicity of Householder
2015-2019 5-Year Period



Source: CHAS tabulation of 2015-2019 ACS 5-year estimates, U.S. Census Bureau and HUD.
Notes: Estimates are based on a sample and carry margins of error. Estimates may be unreliable for small demographic groups including Native Americans and Pacific Islanders.

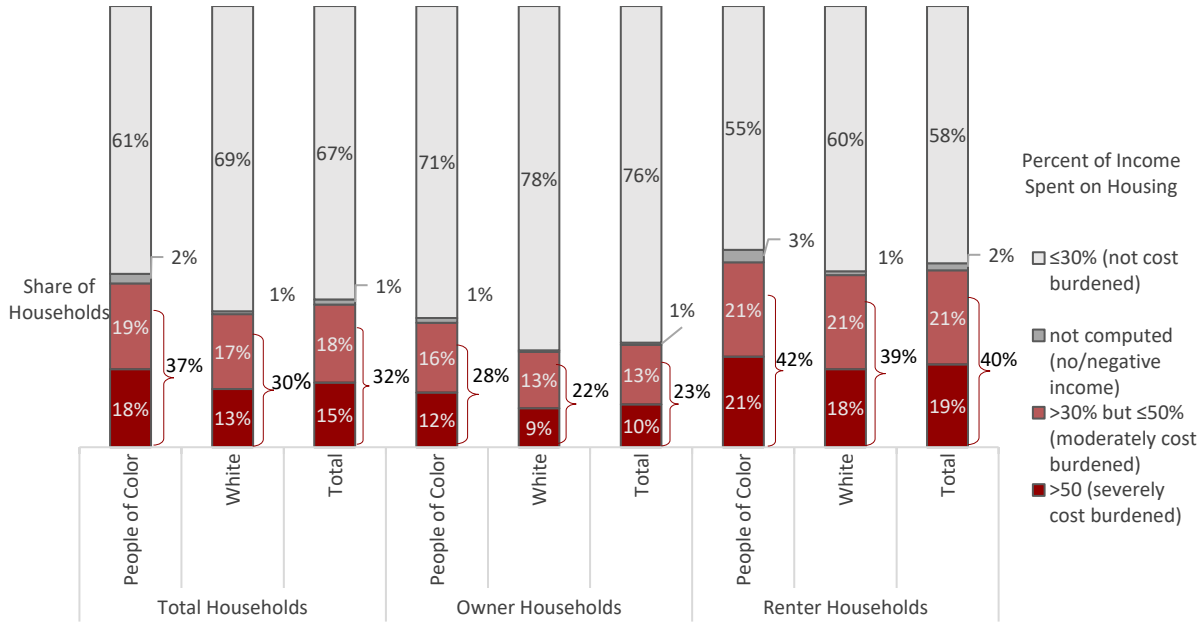
Disparities in the Prevalence of Housing Cost Burden

Housing cost burden falls disproportionately on households of color; this applies when looking at owner households, renter households, and households overall.

As shown in Figure A-58, 37 percent of households of color are moderately or severely cost-burdened compared with 30 percent of white, non-Hispanic households. About 18 percent of householders of color are severely cost-burdened, compared to roughly 13 percent of white, non-Hispanic households. At an estimated 42 percent the share of renter households of color who are shouldering unaffordable housing costs is slightly higher than the estimated 39 percent of white, non-Hispanic renter households with unaffordable housing.

While cost burden is less common for owner households than renter households, racial disparities are more pronounced among owner households. Twenty-eight percent of owner households of color are cost burdened compared to twenty-two percent of renter households of color.

Figure A-57
Prevalence of Housing Cost Burdens by Tenure and Race and Ethnicity
2015-2019 5-Year Period



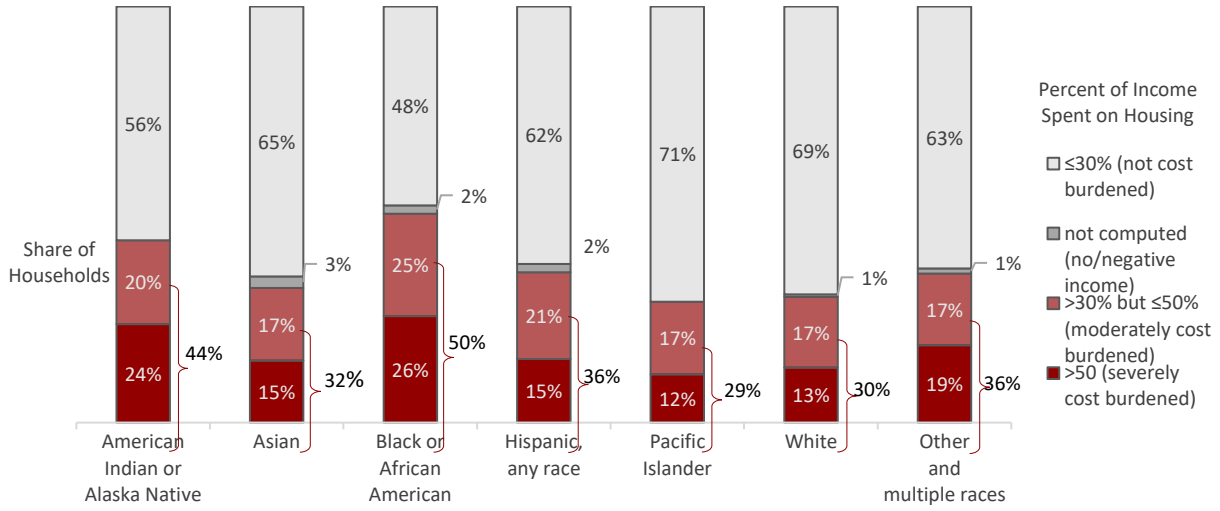
Source: CHAS tabulation of 2015-2019 ACS 5-year estimates, U.S. Census Bureau and HUD.

Notes: ACS estimates are based on a sample and carry margins of error. The Census Bureau and HUD do not calculate the percentage of income spent on housing for households with zero or negative income.

Examining estimates for individual racial and ethnic groups in Figure A-59 finds a disproportionately common experience of cost burden for almost every group of color. That said, substantial variation exists in rates of cost burden among groups of color, with Black households and Native American

households more commonly impacted. The highest estimated prevalence is found among Black households, about half of whom are cost burdened—and roughly a quarter severely so.[44]

Figure A-58
Prevalence of Housing Cost Burden by Race and Ethnicity
2015-2019 5-Year Period



Source: CHAS tabulation of 2015-2019 ACS 5-year estimates, U.S. Census Bureau and HUD.

Notes: ACS estimates are based on a sample and may be unreliable for small demographic groups including Native Americans and Pacific Islanders. See pr evious figure for additional notes.

[44] CHAS estimates can be unreliable for Pacific Islanders and other small populations in Seattle. Looking at the broader Seattle Metro Area provides more statistically reliable estimates and suggests this group is likely disoportionately cost burdened. About 35 percent of Pacific Islander households are cost burdened compared to 29 percent of White households.

Household Sizes, Types, and Needs

The household sizes, types, and needs in a community reflect a variety of demographic and social factors including but not limited to the age and cultural profile of the population; the time in life when young adults form new households; patterns associated with cohabitation, marriage, and divorce; birth rates; and norms associated with supporting elders.

Household sizes are also sensitive to economic and housing market conditions and are shaped by the opportunities and constraints in the existing local housing supply. The prevalence of small units in recent housing production within Seattle, which is detailed in the Housing Supply and Market Analysis section, is an important factor contributing to the size and composition of households that reside in the city.

Figure A-59
Household Types and Sizes in Seattle, 2020

	Count
Total households	345,627
	Percent
HOUSEHOLD TYPE	
Family households:	43.0%
Married couple with no own children	21.2%
Families with own children under 18:	16.9%
Married couple with own children	12.7%
Cohabiting couple with own children	0.9%
One-parent household with own children	3.3%
Other family household	4.9%
Nonfamily households:	57.0%
Householder living alone	40.8%
Cohabiting couple	9.2%
Other nonfamily with 2 or more persons	7.0%
PRESENCE OF CHILDREN AND OLDER ADULTS	
With one or more people under 18	17.9%
With one or more people 65 years and over:	19.1%
Householder 65 years and over living alone	8.9%
HOUSEHOLD SIZE	
1 person	40.8%
2 persons	34.8%
3 persons	11.6%
4 persons	8.6%
5 or more persons	4.2%
	Estimate
AVE. NUMBER OF PERSONS PER HOUSEHOLD	2.05

Source: U.S. Census Bureau 2020 Census.

Notes: Own children are biological, adopted, or stepchildren of the householder.

Household Size and Type

As defined by the Census Bureau, a household includes the householder (someone whose name is on the lease or mortgage) along with anyone else occupying the housing unit as their usual residence.

One way the Census Bureau describes households is whether the household is a family household—households of at least two people where one or more persons is related to the householder by birth, marriage, or adoption—or a non-family household.

As shown in Figure A-60 roughly 43 percent of households in Seattle are family households. About 21 percent of households (and nearly half of family households) are married couple households without own children under 18. About 17 percent of households are family households with an own child under

age 18; about three in four households with own children are married-couple households. About 5 percent of households contain other configurations of families.

In Seattle, family households are outnumbered by nonfamily households. Individuals living alone make up a large majority of nonfamily households and 41 percent of the city's households overall. The balance of nonfamily households includes cohabiting couples and roommate households.

For broader context, the average size of households in the city is 2.05, compared to 2.65 in the remainder of King County and 2.55 nationally. Decennial census data for Seattle have been recording a downward, albeit slowing, trend in average household size for decades, consistent with trends in the U.S. in which people have waited longer to have children and the baby boom has aged. In Seattle, the average number of people per household decreased slightly from 2.06 in 2010 to 2.05 in 2020.[45]

Notably, average household size in King County outside of Seattle followed a different path—*increasing* rather than decreasing during each of the last two decades. The combination of Census data and observations from community stakeholders suggests that divergence in household size trends between Seattle and the rest of King County is partly a function of larger households experiencing increasing difficulty finding units that are affordable and large enough in Seattle to meet their needs. Not only do housing units average fewer bedrooms in Seattle than in the remainder of King County, but this difference in average unit sizes has been widening. From 2008 to 2021, the average number of bedrooms per housing unit declined in Seattle from about 2.21 to 2.05. while remaining at roughly 2.81 bedrooms per unit in the remainder of King County. [46]

Housing Needs of Selected Household Types

In this section, we discuss housing needs of households with older adults, households with children, and multigenerational households as addressing the needs of these households involves challenges that will require especially thoughtful planning and action.

HOUSING NEEDS OF HOUSEHOLDS WITH OLDER ADULTS

About 19 percent of Seattle's households include one or more persons aged 65 or over, and close to half of these are older adults living alone. With the aging of the baby boom population, the share

[45] ACS data show that average household size locally and nationally reached a short-term peak between 2010 and 2020. A January 2023 blog post published by the Harvard Joint Center for Housing Studies, The Surge in Household Growth and What It Suggests About the Future of Housing Demand, indicates that at the national level, the main contributor was a delay—exacerbated by affordability challenges-- in millennials' rate of household formation.

[46] These are rough calculations; we were not able to calculate an exact average using the ACS tables readily available because these tables lumped all units with 5 or more bedrooms into one category.

and number of households with older adults will increase as will the demand for housing that is accessible for older adults and convenient to services.

Many seniors will be aging in place, while others will downsize to a smaller housing unit, move into units in a retirement or assisted living community, while others—especially in their advanced years—will need care in a skilled nursing facility. A growing number of seniors will need in-home services and accessibility features as well as assistance with home repairs and yard care services. Those who have low incomes will need help paying for such services and require discounts on property taxes.

The aging of the baby boom is also likely to drive Seattleites' already strong demand for accessory dwelling units even higher.

HOUSING NEEDS OF HOUSEHOLDS WITH CHILDREN

Living in a home with sufficient space is one of the housing related factors important for children's wellbeing.[47] While housing with two or more bedrooms can be suitable for small families with children, three or more bedrooms are important for accommodating larger families.

The availability of suitably sized units is an important factor influencing where children live. The availability of affordable multi-bedroom housing, in both rental and ownership housing, is necessary for families of a variety of economic means to live in Seattle. Families of color and immigrant families tend to be larger[48] and generally have incomes that are lower[49] than other families. These, and other considerations, make the availability of affordable multi-bedroom housing in a community a key condition for racial equity.

The neighborhood location of these units is a key racial and social equity consideration, as rates of upward economic mobility and a range of outcomes in adulthood, are affected by the characteristics of the neighborhoods in which people lived when they were children.[50]

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[47] Solari CD, Mare RD. Housing crowding effects on children's wellbeing. Soc Sci Res. 2012 Mar;41(2):464-76. doi: 10.1016/j.ssresearch.2011.09.012. Epub 2011 Oct 15. PMID: 23017764; PMCID: PMC3805127.

[48] In Seattle, per the 2021 ACS 5-Year estimates, the average size of all families (not just families with children) is 2.82. For those with householder of color, it is 3.30, compared to 2.58 for families with a white householder. For families with an immigrant householder, it is 3.08 compared to 2.74 for families with a non-immigrant householder. (Some family households include nonrelatives as well as relatives,

[49] In Seattle, the poverty rate for families with a related child of the householder is 7.2%. Looking at subsets of these families finds a 15.1% poverty rate for families with a householder of color compared to a poverty rate of just 3.1% for those with a white householder; and 13.8% for families with an immigrant householder compared to 5.0% for those with a non-immigrant householder,

[50] See The Opportunity Atlas: Mapping the Childhood Roots of Social Mobility | Opportunity Insights, NBER Working Paper by Raj Chetty, et. al., October 2018, and the non-technical summary here.

HOUSING NEEDS OF MULTIGENERATIONAL HOUSEHOLDS

Multigenerational households are those in which there are two or more generations besides or in addition to a parent and one or more of their children under the age of 18. Examples are grandparents living with grandchildren, adult children living with parents, and households where there may be three or more generations.

Housing that can accommodate multiple generations is important for many cultural groups in Seattle. With the aging of the baby boom generation and the increasing cost of housing, broader demand for housing suitable for multiple generations is also likely to increase.

Multigenerational households currently make up about 8 percent of households in Seattle and 15 percent of households in King County as a whole.[51] At 3.53 persons in Seattle and 3.83 in King County, multigenerational households also have significantly higher average household sizes than other households. The housing units in which these households live are also larger, with more than 3 bedrooms on average for both Seattle and King County. The relatively low share of large multi-bedroom units in Seattle plays an important role in the lower rates of multigenerational households within Seattle.

Households of color are more likely to live in a multigenerational household than are white households. The groups with the highest rates of multigenerational living in Seattle and King County are Pacific Islanders and Native Americans.[52]

The need for multigenerational housing has been a strong theme voiced by BIPOC community stakeholders including the sləpʔiləbəxʷ Indigenous Planning Group and the Wa Na Wari / CACE 21 team whom OPCD contracted to make recommendations for the Comprehensive Plan. These groups stress the need for more housing that provides opportunities for multiple generations to live with or near each other and that offers accessibility for older family members and outdoor spaces for children to play.

[51] These estimates for multigenerational households described here are from the ACS 2021 5-Year Public Use Microdata Samples, 2017-2021; IPUMS USA.

[52] In Seattle, 31 percent of Pacific Islander households and 25 percent of Native American households are multigenerational; respectively, these rates are six times and three times those of the 12.5 percent multigenerational household rate for white households. Households with a Black, Asian, or Hispanic households are roughly one and half to two times as likely than white households to be multigenerational.

Special Housing Needs

This section focuses on populations who have needs for special forms of housing and/or housing paired with special services. This includes people with a special housing need due to a disability or chronic health problem, those who require permanent supportive housing (PSH), those who live in group quarters, and those who have a medical housing need.

While we describe these populations separately, many people may identify with one or more population groups. Thus, these population groups are rather intertwined, sharing varying housing needs specific to the individual person. As these special housing needs are unique, a diverse supply of appropriate, available, and affordable housing is critical to meeting those needs.

Furthermore, many of these special housing needs are also correlated with a person's vulnerability to homelessness. For instance, populations experiencing homelessness are disproportionately more likely to have a disability or chronic health issue. In addition, permanent supportive housing is specifically for people who are at imminent risk of homelessness or who are currently homeless. We further cover emergency and permanent housing for people facing homelessness in the Homelessness section of this Housing Appendix.

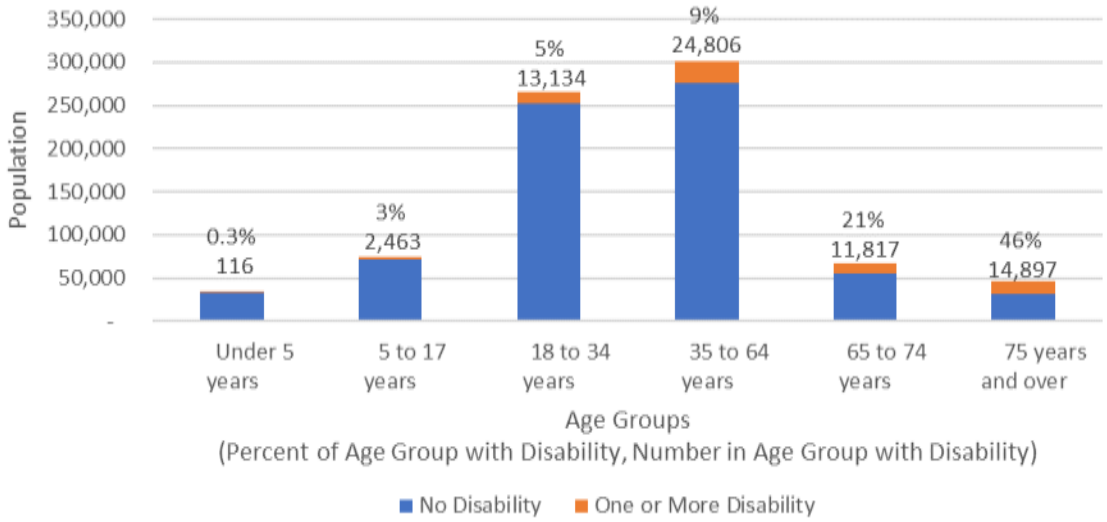
Populations with Disabilities

The ACS collects data on people living with disabilities in four domains: hearing, vision, cognition, and ambulation.[53] These data provide important but limited insights into the population in Seattle living with disabilities. Given the ACS's narrow scope of disability questions, the survey underestimates the population living with disabilities and fails to capture the full range of disabilities with which people are living. Researchers note that the ACS particularly underestimates disability due to disabling chronic health conditions and psychiatric conditions.

As shown in Figure A-61, roughly 9 percent of Seattle residents (67,233 people) live with one or more of the ACS-identified disabilities. The share of people living with disabilities greatly increases with age. The largest numerical age group of people living with disabilities is the 35-to-64-year range; however, the largest share of people living with disabilities are people aged 75 and up.

[53] The Disability questions in the ACS are shown in this primer from the Census Bureau: "Why We Ask Questions About Disability."

Figure A-60
Population in Seattle Living with One or More Disability by Age Group



Source: U.S. Census Bureau 5-Year American Community Survey for 2017 to 2021

Further analysis of ACS data provides information about the socioeconomic conditions of households where one or more persons have a disability. According to our analysis, nearly one in five Seattle households had at least one person with a disability in 2021. Figure A-62 demonstrates that households where at least one member is living with a disability are more likely to have lower incomes, with more than half at or below 80% of AMI, and more than a third at or below 50% of AMI. Research shows that lower household incomes are tied to a variety of systemic factors that impact individuals with disabilities, such as barriers to accessible education and employment as well as discrimination.[54] In addition, if there is a caregiver in the household, those members may take temporary leave or forego work altogether to assist in care. Female members of households are particularly more likely to forego paid work outside the home for unpaid caregiving work at home.[55]

Given their lower incomes, households where someone has a disability are also significantly more likely to spend a high proportion of their income on housing costs, with greater rates of burden. That burden is more acute as many people with disabilities face higher costs of healthcare. Thus,

[54] Disability & Socioeconomic Status Resources, a series of study outcomes compiled by the American Psychological Association

[55] Caregiving Statistics: Work and Caregiving; a series of statistics on informal and formal caregiving from Caregiver.org

many households are faced with tradeoffs between the costs of housing, other daily needs, and medical care.[56]

Figure A-61
Household Characteristics by Presence of Person with a Disability

	Households where no person has a disability	Households with one or more persons living with a disability	All Households
Household Income			
≤ 80% of AMI	32.2%	52.0%	36.2%
≤ 50% of AMI	18.4%	37.6%	22.3%
Housing Cost Burden			
>30% of income on housing	31.6%	40.6%	33.5%
>50% of income on housing	14.5%	23.2%	16.3%

Sources: U.S. Census Bureau ACS Public Use Microdata Samples, 2017-2021; IPUMS USA.

Notes: PUMS data uses areas of approximately 100,000 are not always bound to jurisdictional boundaries. This results in some household data for unincorporated King County, particularly in White Center and Highline, being included in PUMS data. Household AMI level is determined using household income as a proportion of FY2021 area median income estimates, adjusted for household size.

Populations Needing Permanent Supportive Housing

Permanent Supportive Housing (PSH) combines housing with services that help residents at risk of homelessness remain housed and improve their quality of life. PSH has been shown to benefit residents by reducing instances of medical emergency, homelessness, and incarceration. It is also a critical portion of the housing supply for populations with incomes at or below 30% of AMI. The specific needs of the population requiring PSH vary greatly depending on each person's situation.

Examples of services residents may need include job training, help with finances, transportation, and health care. Services are most effective if culturally appropriate to the residents, such as those being provided to QT2BIPOC (queer, trans, Two-Spirit, Black, indigenous and people of color) households by the Lavender Rights Project and those provided to Native American/Alaska Native households by Chief Seattle Club. [57]

[56] "Medication Adherence and Characteristics of Patients Who Spend Less on Basic Needs to Afford Medications", in Journal of the American Board of Family Medicine. Rohatgi, K., et al. 2021.

[57] Lavender Rights Project and Chief Seattle Club will be joint operators of a 35-unit permanent supportive housing program funded by King County's Health Through Housing. For more information about these organizations, visit their webpages: Lavender Rights Project: https://www.lavenderrightsproject.org/ ; Chief Seattle Club: https://www.chiefseattleclub.org/

Figure A-34 in the Housing Need Projections section of this Housing Appendix shows that King County's Growth Management Planning Council estimates Seattle will need 20,255 PSH units by 2044. This estimate represents an increase of 15,024 units over the existing 5,231 units Seattle had at the beginning of 2020.

Several key conditions apply to the services provided to tenants in PSH. Tenants are not required to pay for services, nor is participation in services required to maintain tenancy in a community. Costs associated with services are considered an integral part of building-level operations and maintenance, which is paid for through income-restricted rents and out of subsidies from local, state, or federal governments.

Thus, the growing need for PSH in Seattle will require both a significant increase in income-restricted units at the lowest AMI levels as well as operations and maintenance subsidies to provide services required by residents. However, PSH has also been shown to reduce societal costs through homelessness prevention, particularly in the healthcare, shelter, and justice systems.[58] The Income-Restricted Housing section of this Housing Appendix further forecasts the available finances and gap in investments to meet the citywide need for PSH in 2044.

Populations in Group Quarters

Many group quarters categories are devoted to serving people who can broadly be regarded as populations with special housing needs. The Census Bureau defines group quarters as "places where people live or stay in a group living arrangement that is owned or managed by an organization providing housing and/or services for the residents."[59] The decennial Census includes a tabulation of the population residing in group quarters and is thus one of our most valuable sources in understanding the size of this population.

Figure A-63 shows the 2020 Census enumerated 29,918 people living in group quarters in Seattle. Roughly 25,000 of the persons living in group quarters were counted in noninstitutional facilities while about 4,900 of the group quarters population were counted in institutional facilities, primarily in nursing facilities. Persons aged sixty-five and over made up a large majority of the nursing facilities population.

College/University student housing was the largest non-institutional category, with nearly 16,000 people. In addition, the 2020 Census counted 3,300 people under "other noninstitutional facilities"

[58] "Supportive Housing Helps Vulnerable People Live and Thrive in the Community." Center on Budget and Policy Priorities. Dohler, et al. 2016.

[59] For more about the ways the Census Bureau collects and reports data on group quarters, see "2020 Census Group Quarters," U.S. Census Bureau blog post, March 16, 2021; and for detailed group quarters subject definitions see pages B-15 to B-20 in "2020 Census Demographic and Housing Characteristics File (DHC) Technical Documentation," prepared by the U.S. Census Bureau, Washington, DC, 2023.

like soup kitchens and domestic violence shelters. Many people counted in “other noninstitutional facilities" may have been experiencing homelessness during the census.[60]

The population in group quarters does little to tell us about the demand for these living situations. Rather, it tells us only the number of people who are living in group quarters currently, many of which operate at capacity due to high demand. Despite these limits, key takeaways for group quarters include the following:

- Growth over the last decade has been concentrated in the population in nursing homes (from 2,588 to 3,476), group homes intended for adults (from 1,387 to 2,557), and college dormitories (from 11,804 to 16,318).
- Group quarters populations in carceral facilities shrank from 2010 to 2020, which may reflect moves from facilities inside Seattle to those outside Seattle, changes in incarceration policies, and COVID-19 related early releases that occurred during the 2020 Census. In addition, King County has set forth a Roadmap to Zero Youth Detention, with the 2025 goal of eliminating youth detention in favor of a public health approach for youth.[61]
- The population in residential treatment centers also fell between 2010 and 2020. This may be in part due to COVID-19, which temporarily limited capacity in some facilities due to social distancing needs and labor shortages, but also reflects due to permanent closures of residential treatment centers that have occurred in Seattle[62] and across King County.[63] This comes at a time when there have been notable increases in demand for mental and behavioral health residential treatment centers, which culminated in King County voters approving a levy in 2023 to develop five new residential treatment centers.[64]

[60] However, a specific count of persons experiencing homelessness is not reported in the decennial census, and even though the Census Bureau attempted to include these persons in the 2020 Census, the data that we have on the unhoused population from other sources, as described in Homelessness of this Housing Appendix indicates very incomplete coverage of this population in the 2020 Census.

[61] “Roadmap to Zero Youth Detention”. King County.

[62] Closure of El Rey, a residential treatment facility in Belltown. Written by Seattle Times reporter Sydney Brownstone, October 2020.

[63] “Where did King County’s mental health beds go?” Written by Seattle Times reporter Hannah Furfaro, February 2023.

[64] “Voters approve King County’s crisis center levy.” Written by Seattle Times reporter Michelle Baruchman, April 2023.

Figure A-62
Seattle Group Quarters Population

	2010 Census				2020 Census			
	<18	18 to 64	65 and Up	Total	<18	18 to 64	65 and Up	Total
Total Population in Group Quarters:	700	21,329	2,896	24,925	629	24,798	4,491	29,918
Institutionalized population in Group Quarters								
Total	198	2,502	2,204	4,904	225	1,336	3,352	4,913
Institutionalized population in Correctional Facilities for Adults:								
State Prisons	-	-	-	-	-	85	2	87
Local Jails	-	1,527	14	1,541	-	741	2	743
Correctional Residential Facilities	-	450	-	450	2	170	11	183
Institutionalized population in Juvenile Facilities:								
Group homes	48	10	-	58	122	18	-	140
Residential Treatment centers	57	-	-	57	9	12	-	21
Correctional facilities for juveniles	90	-	-	90	25	5	-	30
Nursing/Skilled-nursing facilities	-	449	2,139	2,588	-	227	3,249	3,476
Institutionalized population in 0other institutional facilities:								
Psychiatric hospitals or units	1	48	4	53	25	64	67	156
Patient in hospital with no home	2	-	-	2	40	2	-	42
In-patient hospice facilities	-	18	47	65	2	12	21	35
Non-institutionalized population in Group Quarters								
Total	502	18,827	692	20,021	404	23,462	1,139	25,005
College/University student housing	71	11,733	-	11,804	64	16,254	-	16,318
Military quarters, barracks, or ships	-	362	-	362	8	398	2	408
Emergency and transitional shelters with sleeping facilities	227	2,208	115	2,550	104	1,875	140	2,119
Group homes intended for adults	7	1,054	326	1,387	42	1,831	684	2,557
Adult Residential treatment centers	5	619	13	637	2	322	48	372
Maritime/merchant vessels	-	305	2	307	-	134	-	134
Workers' group living quarters	5	41	24	70	3	23	8	34
Other non-institutional facilities*:	187	2,505	212	2,904	185	2,824	258	3,267

Source: U.S. Census Bureau, decennial Census 2010 & 2020, Table P18

*Soup kitchens, religious group quarters, domestic violence shelters, scheduled mobile food vans, targeted non-sheltered outdoor locations, living quarters for victims of natural disaster

Populations with Housing-Associated Medical Services Needs

There are several kinds of situations in which a person's medical care needs are paired with their housing need. These situations often involve people who need a change in their housing situation to accommodate their medical need. Populations who require medical services and have a housing need include, but are not limited to:

- hospitalized people who would otherwise face homelessness upon release,
- hospitalized people awaiting admission to another facility,
- people who face homelessness and require medical respite care,
- people staying in temporary or long-term medical facilities, and
- home-bound people who require home health services.

Having appropriate and available forms of medical services paired with housing is critical for improving this system. Skilled nursing and long-term care facilities are notable examples of the provision of housing with medical care, as are types of behavioral health facilities and substance use treatment centers. Emergency housing, such as Harborview's Edward Thomas House Medical Respite Program, also plays a critical role in providing medical services for people experiencing homelessness who are too sick to return to shelters or the street following a hospital stay.

Furthermore, recent conditions in the COVID-19 pandemic resulted in a shortage of available pairings of housing with medical services. In August and September of 2022, the *Seattle Times* reported that Harborview Medical Center began to divert non-critical patients to other local hospitals due to being over capacity. At the same time, some patients ready to be discharged to long-term care and skilled nursing facilities could not be released due to limited space and staffing in those facilities.[65] Instances like this demonstrate the vulnerability of the medical housing system to economic changes and pandemics, and require collaborative efforts between agencies, funders, and governments to reduce their frequency and impacts on local populations.

[65] "Harborview still way over capacity, as long-term care shortage persists". David Gutman. Seattle Times, September 14, 2022.

Balance of Jobs and Housing

A key principle of planning is that there needs to be a balance between jobs and housing within an area so that enough housing is available near people's workplaces. When the ratio of jobs to housing is imbalanced, residents commute long distances, which involves higher transportation costs; takes a toll on social wellbeing and health; and has negative environmental impacts. A supply of ample and affordable housing choices near job centers is especially important to address the needs of low-wage workers who are less to pay the premiums the housing market demands in these neighborhoods.

The Regional Growth Strategy calls upon Metropolitan Cities and Core Cities to improve the jobs housing balance and provide a greater variety and supply of housing to meet the needs of workers. As the largest Metropolitan City and major employment center for the region, Seattle has a particularly important role in this regard.

PSRC's 2022 Regional Housing Needs Assessment[66] states that a "balance" of jobs and housing "is attained where a community or market area attains roughly the regional average ratio." The ratio of jobs to housing units in Seattle is roughly 1.9, much higher than the overall ratio of 1.3 for the 4-county central Puget Sound region. PSRC also examined changes in the region's jobs-to-housing ratio from 2010, when the number of jobs was at a low point in the wake of the Great Recession, to 2019. The ratio increased substantially between 2010 and 2019, with many years of rapid job growth, and sizable—but not as rapid—housing growth.

The remainder of this section looks at trends in the jobs-to-housing ratio within Seattle using data on jobs covered by state unemployment insurance. For looking at trends in Seattle, we use statistics for covered jobs instead of total jobs because the covered jobs dataset provides the longest running and most precise employment numbers on employment available at the city level.[67] Figure A-64 shows trends in Seattle from 2004 to the most recent year for which data are available at the time of this analysis—2022 for jobs and 2023 for housing units.

As happened regionally, the jobs to housing also imbalance worsened in Seattle in the 2010s. Between 2010 and 2020 Seattle expanded its housing supply by 19 percent. Even with this boom in housing construction, Seattle's job growth far outpaced its housing growth, as the number of jobs in the city rose by 38 percent. Over the decade, Seattle added nearly 3 times as many jobs as housing units. The net effect was to increase the ratio of covered jobs to housing in the city from 1.5 in 2010 to roughly 1.7 in 2020.[68]

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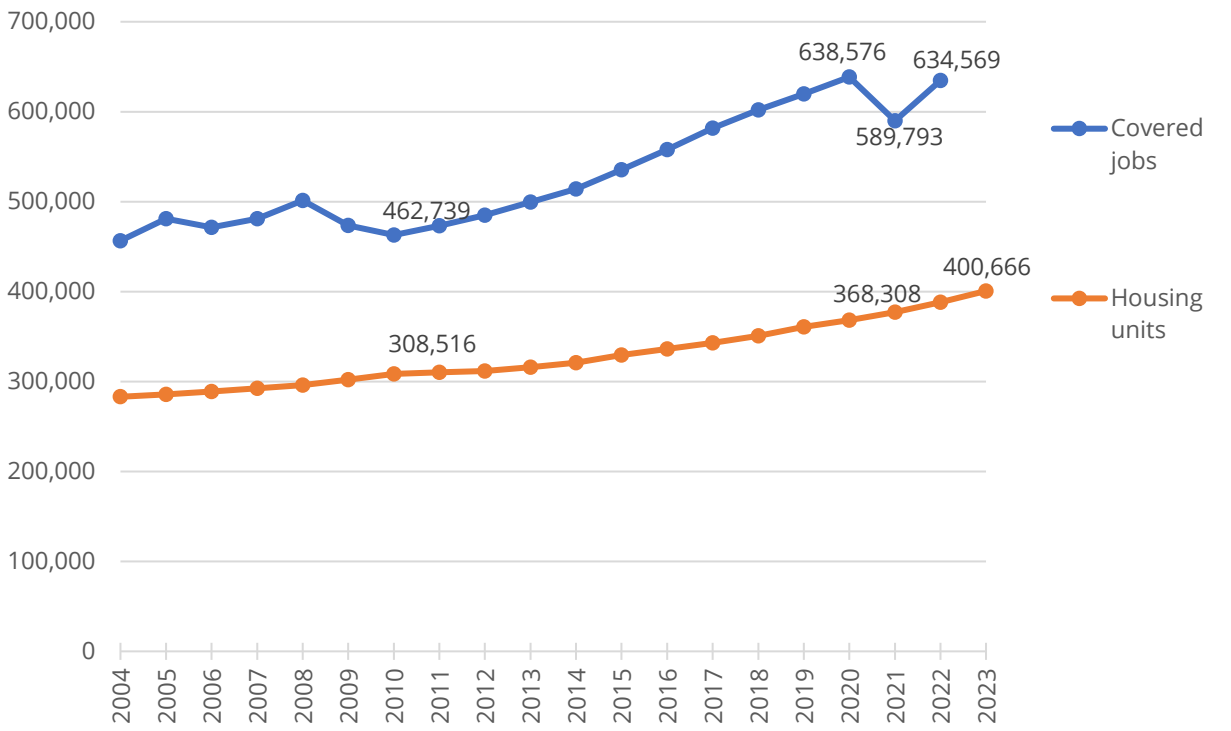
[66] Regional Housing Needs Assessment (January 2022) (psrc.org), pages 84-86.

[67] At the regional level, PSRC estimates that, covered jobs tend to comprise roughly 85 to 90 percent of total jobs. Total jobs estimates are readily available for Seattle only back to 2015.

[68] Factoring covered employment up to total jobs yields an estimate of 1.9 total jobs-to-housing for both 2019 and 2020; this is the ratio for Seattle that we compared to the regional 1.3 total jobs-to-housing ratio earlier in this section.

By 2022, Seattle had one percent fewer covered jobs than in 2020 and five percent more housing units than in 2020 and Seattle's covered jobs to housing ratio had declined to roughly 1.6. During the early pandemic years, large housing developments continued to be constructed, albeit with some delays, by builders with permits issued prior to the pandemic. This happened as the labor market declined and then began recovering. While developers continued to complete large numbers of units into 2023, the City's data shows a sizable recent decline in the number of new units for which developers are getting permits issued. The reduced volume suggests that the "improvement" in the jobs housing balance during the first years of the pandemic may be temporary.

Figure A-63
Covered Jobs and Housing Units Located in Seattle



Sources: Covered employment estimates for March obtained from PSRC, and published in City of Seattle's City Annual Stats dataset. Housing unit estimates for April from WA OFM 2000-2020 intercensal estimates and 2021-2023 postcensal estimates.

Notes: Covered employment refers to jobs covered by the Washington State Unemployment Insurance program. These jobs exclude self-employed workers, proprietors, corporate officers, and some other positions. PSRC estimates that covered employment includes about 85-90% of all employment.

In addition to examining the jobs-housing imbalance, PSRC also examined the regional housing backlog that accumulated between 2010 to 2019 by taking into account the number of additional new households the region *would have* gained over the last decade if households were able to form without being constrained by the lack of available housing.[69] Through their examination of pent-up demand for formation of new households, PSRC estimated a backlog from the period 2010 to 2019 of approximately 45,000 to 50,000 units in the central Puget Sound region.[70]

[69] Regional Housing Needs Assessment (January 2022) (psrc.org), page 98.

[70] This was a rough analysis that has limitations:

- Analyses that examine housing formation and production to estimate underproduction must naturally select a time period and baseline. In the baseline year of 2010 for this analysis, the housing vacancy rate in the region was unusually high, at 7.4 percent (compared to an average of 6.0 percent in the four decennial censuses between 1980 and 2010.) Using a baseline with a high housing vacancy rate could lead to the estimated backlog being somewhat of an overestimate.
- Other aspect of the analysis underestimate underproduction in important ways: as PSRC noted, the analysis does not account for housing units needed by the large and growing number of persons experiencing homelessness. The analysis also does not account for households unable to live in the Puget Sound region due to our region's high housing costs.

Housing Supply and Market Analysis

This section focuses on the housing supply and market, including recent development and pricing trends. It includes analyses that assess to what extent different occupations can afford rental housing, the quality and condition of housing, and the roles of ADUs and vouchers in Seattle's housing market.

These analyses are important when making policy decisions that focus on where and how housing should be developed in Seattle and to address gaps relative to housing need. Furthermore, this information can highlight choices and constraints that households face when trying to find and maintain housing in Seattle.

Housing Supply

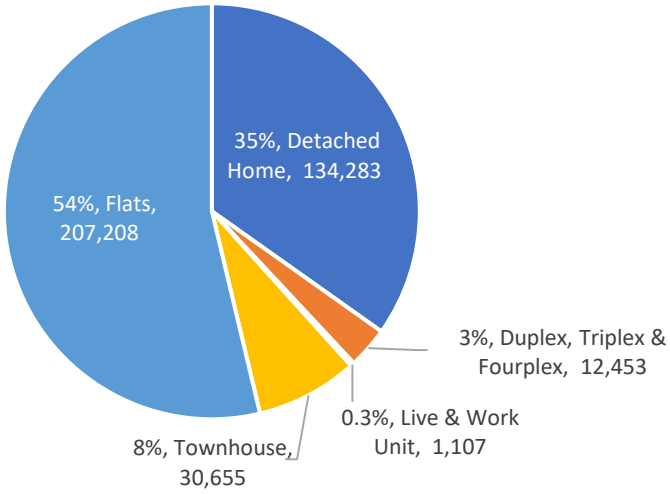
In this analysis, we use the term "housing supply" to refer to permanent structures in the form of housing units or congregate residences. Housing units include housing forms such as a detached home, flat, or an accessory dwelling unit, each of which would have, at minimum, a private kitchen and bathroom in the unit. Congregate residences include settings like group homes, student dormitories, senior housing, and certain institutional facilities, and may not include private kitchens or bathrooms for residents. For purposes of this section, housing supply does not include temporary or emergency housing accommodations such as shelters, tiny homes, and resident hotels. Temporary forms of housing for individuals experiencing homelessness are discussed in the Homelessness section of this Housing Appendix.

HOUSING UNITS BY TYPE

Figure A-65 provides detail on the composition of Seattle's housing unit supply by unit type based on data maintained by the King County Department of Assessments. As of mid-2022, Seattle had 385,706 housing units, with the following shares of unit types:

- Flats, which can be in multifamily or mixed-use buildings and are typically apartments or condominiums, make up 54 percent of units in Seattle.
- Detached homes make up an additional 35 percent of units.
- Townhouses make up 8 percent of housing units.
- Small multiplexes, including duplexes, triplexes and fourplexes make up only 3 percent of housing units.
- The remaining 0.3 percent are made up of live-work units, which vary in form, such as a townhouse where the first floor is used as a salon, or a caretaker unit at a storage facility.

Figure A-64
Seattle's Housing Supply by Housing Type



Source: King County Department of Assessments, compiled by City of Seattle, July 2022

HOUSING UNITS BY NUMBER OF UNITS IN BUILDING

Figure A-66 categorizes Seattle's housing units based on the number of units in each building. The number of units in each building closely relates to regulations, such as zoning, and market trends present during development. Zoning has precluded development of smaller multifamily structures in most of Seattle's residential land area since Seattle adopted its first zoning policies code in 1923.[71] Many of these smaller multifamily structures have come to be known as the "missing middle" or

[71] Ordinance 45382 established a First Residential District which was limited to detached homes, public schools, private schools, churches, parks, art galleries, libraries, conservatories for plants and flowers, and railroads. Accessory uses were allowed for physicians and dentists. Fraternity houses, sorority houses, specific private schools, and certain communal spaces were subject to public hearings. The ordinance passed through the Public Safety committee. Visit the Seattle City Archives to find out a more in-depth history of Seattle's zoning, including historical zoning maps.

"middle housing." Local and state reforms in recent years, and policies in this Comprehensive Plan, seek to boost the production of middle housing throughout Seattle.[72]

Most housing units in Seattle are either flats in larger buildings or single units in detached and attached configurations. A more detailed breakdown of the current supply of units in Seattle shows:

- Single-unit buildings comprise 156,800 housing units in total, which includes 133,600 detached homes, 22,300 townhomes, and 900 units in other attached configurations. Single-unit attached configurations indicate that these units are owned fee-simple.[73]
- Buildings with between 2 and 4 units include around 19,100 units across approximately 7,700 buildings. This category includes duplexes, triplexes, and fourplexes along with townhouses and some detached homes.[74]
- Buildings with 5 to 19 units include about 38,000 units in approximately 4,000 buildings.
- Buildings with 20 to 49 units have about 42,100 units in approximately 1,400 buildings.
- Buildings with 50 or more units have about 129,600 units in approximately 1,050 buildings.

[72] In their Middle Housing in Washington webpage, the state Department of Commerce provides guidance to help local governments plan for middle housing and implement related requirements established by House Bill 1110, which the state legislature passed in 2023. Commerce's overview explains that:

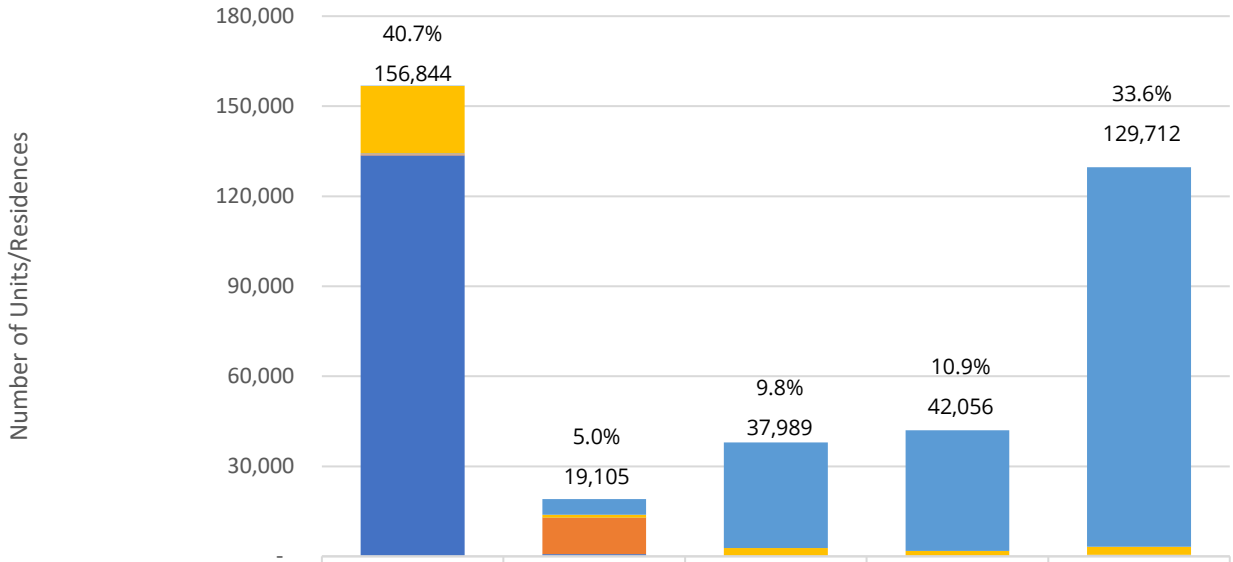
"Middle housing is a term for homes that are at a middle scale between detached single-family houses and large multifamily complexes. Examples include duplexes, triplexes, fourplexes, fiveplexes, sixplexes, courtyard apartments, cottage clusters, and townhomes. These types are typically 'house-scale'; that is, the buildings are about the same size and height as detached houses."

HB 1110 requires cities (with limited exceptions) to allow minimum numbers of middle housing units per lot, with Seattle and other cities with a population 75,000 being subject to the higher unit density requirements for middle housing than other cities.

[73] Fee-simple ownership indicates that both the land and housing units are sold together. See the Ownership Market section of this Housing Appendix for an in-depth explanation of fee-simple and condominium ownership.

[74] King County Department of Assessments frequently classifies detached homes with ADUs as structures other than detached homes, with many reported to be townhouses.

Figure A-65
Seattle's Housing Supply by Number of Units in Building



	One Unit	2 to 4 Units	5 to 19 Units	20 to 49 Units	50 Units and Up
Flat	112	5,197	35,217	40,194	126,488
Townhouse	22,345	1,052	2,747	1,775	2,736
Live & Work Unit	503	4	25	87	488
Duplex, Triplex & Fourplex	303	12,150	-	-	-
Detached Home	133,581	702	-	-	-

Source: King County Department of Assessments, compiled by City of Seattle, July 2022

HOUSING UNITS BY NUMBER OF BEDROOMS

The number of bedrooms that housing units contain is an indicator of how well the supply of housing accommodates households who reside in or seek to reside in Seattle. Examples of how units with various numbers of bedrooms can serve households include:

- Zero-bedroom units, such as studios and small efficiency dwelling units, and 1-bedroom units are important segments of the housing supply for persons living alone or as couple.
- Units with multiple bedrooms are important for meeting the needs of families with children and other multigenerational households, as well as for households with roommates.

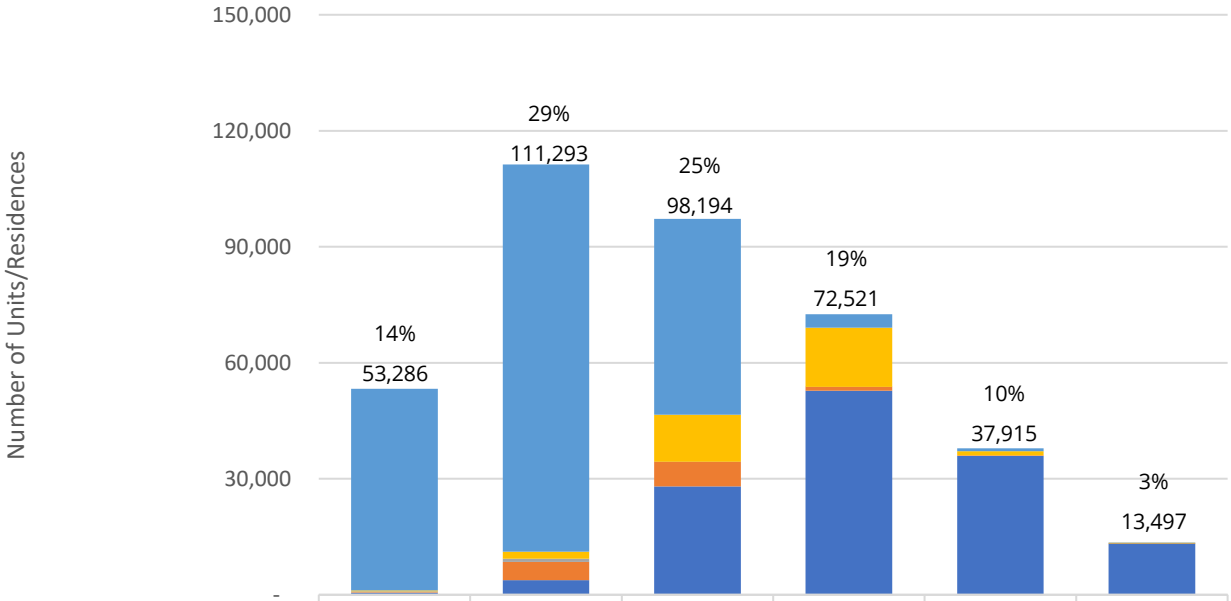
The two most common housing unit types—flats and detached homes—have very different bedroom profiles, as shown in Figure A-67. Three-quarters of existing flats in Seattle are 0- or 1-bedroom units. In contrast, more than 95 percent of all detached homes have multiple bedrooms, with most being 3- or 4-bedroom units. Nearly all units with 4 bedrooms or more are detached homes.

Other types of housing, while currently making up relatively small shares of the housing supply, play an important role in contributing units with different numbers of bedrooms. Townhomes, which are

typically limited in size and scale through development regulations, are mostly 2- or 3-bedroom units. A large majority of small multiplexes are 1- or 2-bedroom units.

Patterns in housing costs, changes in preferences, and demographic trends are influencing how populations seek housing units of different sizes in Seattle. The large concentration of young adults in Seattle contributes to demand for a variety of multi-bedroom units that can accommodate roommates. At the same time, the limited local supply and affordability of units with more than 2 bedrooms relative to many areas in the Puget Sound region can cause larger households, including families with children, to look outside Seattle even when they would prefer to live in Seattle.

Figure A-66
Seattle's Existing Housing Supply by Number of Bedrooms



	0 Bedroom	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom	5+ Bedrooms
Flat	52,156	100,154	50,638	3,414	783	63
Townhouse	233	1,797	12,142	15,322	1,041	120
Live & Work Unit	220	846	37	4	-	-
Duplex, Triplex & Fourplex	194	4,685	6,381	969	171	53
Detached Home	483	3,811	27,996	52,812	35,920	13,261

Source: King County Department of Assessments, compiled by City of Seattle, July 2022

SUPPLY BY BUILDING AGE AND HOUSING TYPE

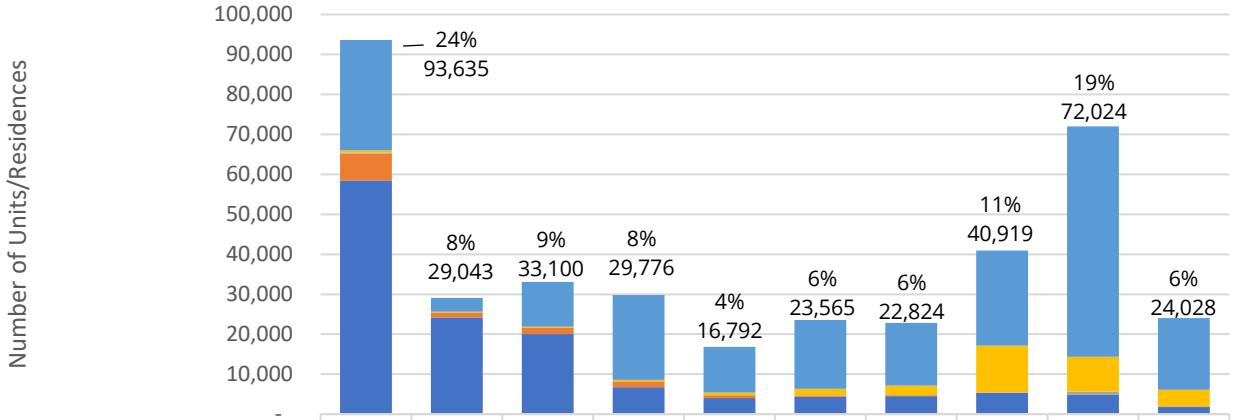
This section analyzes Seattle's housing supply by age and housing type. We use two measures to characterize housing units' age: the year the structure was built, and the effective year built.

The year a structure was built refers to when a building with a housing unit was first constructed. This is a useful measure for understanding when neighborhoods that exist today were shaped. The age of buildings reflects land use and policy decisions that have been made over time. Exclusive zoning for detached homes has essentially frozen the form of many Seattle neighborhoods in time

for over a century, precluding denser development since it was put in place. [75] In comparison, zones that allow townhouses and flats have been limited to few concentrated neighborhoods, primarily within Urban Centers and Urban Villages, which has resulted in changes to their neighborhood form and character as the city has grown.

Figure A-68 shows Seattle's existing housing supply by the year a structure was built. Large majorities of Seattle's detached homes and small multiplex units were built prior to 1970. While there is a significant supply of flats in older buildings, nearly half of existing flats are in buildings built in or after the year 2000. Townhouses tend to be even younger, as nearly 80 percent of townhomes have been built since 2000.

Figure A-67
Seattle's Existing Housing Supply by Year Built and Unit Type



	1940 or Before	1940-1949	1950-1959	1960-1969	1970-1979	1980-1989	1990-1999	2000-2009	2010-2019	2020 or Later
Flat	27,649	3,404	11,263	21,160	11,419	17,253	15,677	23,782	57,642	17,959
Townhouse	564	207	170	444	642	1,611	2,409	11,682	8,790	4,136
Live & Work Unit	226	28	25	13	7	4	8	78	592	126
Duplex, Triplex & Fourplex	6,704	1,190	1,610	1,418	732	365	198	95	73	68
Detached Home	58,492	24,214	20,032	6,741	3,992	4,332	4,532	5,282	4,927	1,739

Source: King County Department of Assessments, compiled by City of Seattle, July 2022

In comparison to the year a structure is built, the effective year built refers to when a building was most recently substantially renovated or, if the building has not been substantially renovated, when

[75] "Seattle's Single-Family Neighborhoods Already Include Thousands of Duplexes," a 2016 analysis by Margaret Morales at the Sightline Institute, shows where multi-unit housing built many decades ago exists in Single-Family zones (since renamed Neighborhood Residential in 2021).

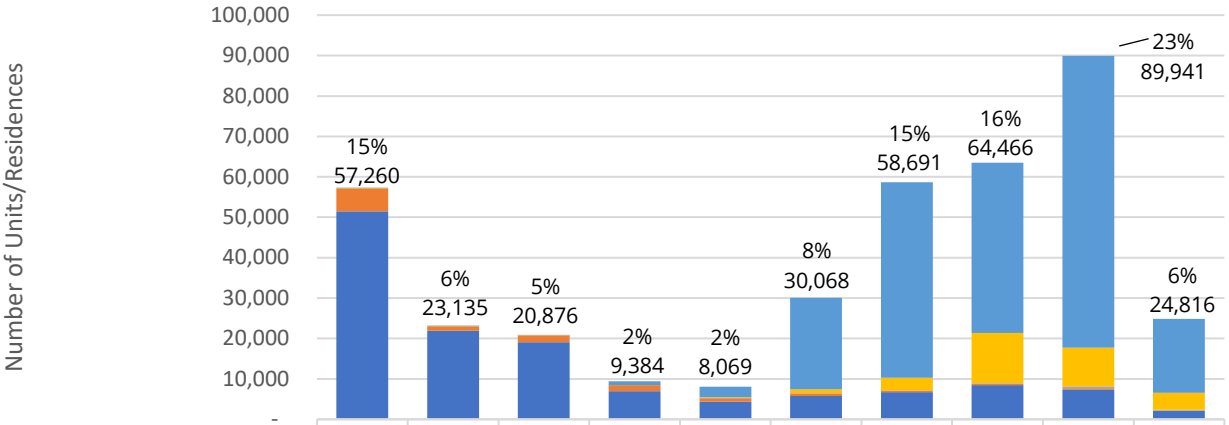
the structure was first constructed.[76] This measure helps us understand the quality of our housing supply while also accounting for the fact that much of Seattle's housing supply is in older buildings that have been renovated, converted, or upgraded to extend their building life.

Effective year built is a particularly useful measure for understanding the market characteristics of flats, as multifamily rental housing tends to become less expensive as it grows older. However, substantial renovations, whether necessary to maintain unit habitability or simply to improve the marketability of an older building, tend to result in higher rents.

Figure A-69 looks at Seattle's housing supply by effective year built. Seattle's existing housing units vary drastically by age in this measure. Of the 110,000 homes older than 1970, approximately 91 percent are detached homes. Nearly all of Seattle's existing flats and townhomes have effective years built in the 1970s or later. These observations reflect that many flats have been built, renovated, or updated since the 1970s, but also point to a portion of the supply of flats that has not been substantially renovated since the 1980s, and is therefore aging.

[76] We use the King County Assessor's effective year built. King County's Assessor uses an internal methodology to determine when a building was most substantially renovated; however, typical definitions used include when renovations cost more than 50 or 60 percent of the cost to wholly replace a building, or renovations that extend the useful life of a building.

Figure A-68
Seattle's Existing Housing Supply by Effective Year Built and Housing Type



	1940 or Before	1940-1949	1950-1959	1960-1969	1970-1979	1980-1989	1990-1999	2000-2009	2010-2019	2020 or Later
Flat	5	27	97	881	2,630	22,649	48,382	42,071	72,250	18,216
Townhouse	59	73	43	26	179	930	3,103	12,471	9,548	4,223
Live & Work Unit	8	8	7	18	38	91	63	129	618	127
Duplex, Triplex & Fourplex	5,719	1,113	1,625	1,518	839	602	428	299	214	96
Detached Home	51,469	21,914	19,104	6,941	4,383	5,796	6,715	8,496	7,311	2,154

Source: King County Department of Assessments, compiled by City of Seattle, July 2022

SUPPLY OF CONGREGATE RESIDENCES

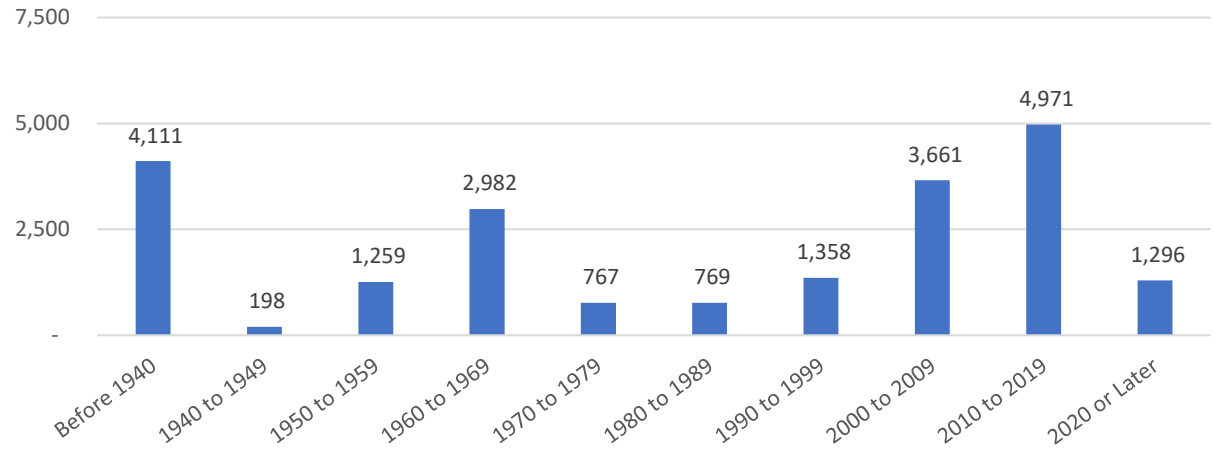
Congregate residences are several forms of permanent housing which include co-living, group homes, student dormitories, senior housing, and certain institutional facilities. In some cases, congregate residences are rented as just a bedroom, while in others they look like an apartment unit. In some cases, they provide services specific to a population with special housing needs, such as college students, older adults, or individuals with disabilities.

Figure A-70 shows that Seattle had 21,372 congregate residences as of 2022. Furthermore, congregate residences are largely in buildings that have 50 or more residences (i.e., sleeping rooms). Figure A-71 shows there was a growth of over 3,000 congregate residences between the beginning of 2016 and 2022, the period since the last major update of the Comprehensive Plan in 2015.

Figure A-69
Congregate Residences by Residences in Structure

Under 5 Residences	5 to 19 Residences	20 to 49 Residences	50+ Residences	Total Residences
189 (1%)	2,243 (10%)	4,015 (19%)	14,925 (70%)	21,372
Source: King County Department of Assessments, compiled by City of Seattle, July 2022				

Figure A-70
Congregate Residences by Year Built



Source: King County Department of Assessments, compiled by City of Seattle, July 2022

Recent Housing Production

Annual housing production in Seattle has been strong since 2015, with a temporary slowdown in production during the COVID-19 pandemic. Key factors influencing production during this period include:

- the growth in demand associated with the rising population and employment,
- the large number of high-paid technology jobs added during the 2010s, and
- socioeconomic shifts associated with the COVID-19 pandemic.

Figure A-72 shows annual permit data for housing units from 2016 through 2022, including numbers of new units finaled, units demolished, and net new units.[77] In total, during this period, 62,739 new units were finaled and 4,411 units were demolished, for a net addition of 58,328 units.

[77] Finaled units refers to units where the construction permit is considered finaled by receiving a final building inspection or temporary certificate of occupancy. Net new units are new units finaled minus units demolished. The numbers in the figures do not include data on production of new congregate housing. There were 3,071 congregate residences finaled over the 2016 to 2022 period; however, demolition data for congregate residences is limited.

The data we summarize in this subsection and the next are from the April 10, 2023, publication of the Quarterly Housing Report Dashboard, which uses City of Seattle permitting data to determine when and in what form housing is developed. This dashboard is updated quarterly by OPCD. Data on buildings and units are collected and categorized differently in Seattle's building permits data than in data from the King County Department of Assessments, which is used in many of the other analyses this Housing Appendix includes on Seattle's housing supply. This may result in slightly different building classes and total numbers of unit production being reported in any given year.

During this period, Seattle's annual net unit growth saw an initial peak in 2019 with more than 10,000 net new units. The following year saw a precipitous drop in housing units finaled due to the pandemic. With rapid changes in the finance and housing markets, net unit production accelerated between 2021 and 2022, with production finals surpassing the 2019 peak in 2022.

Figure A-71
Annual Housing Unit Production and Demolitions

Year	New Units Finaled	Demolitions	Net New Units
2016	7,211	607	6,604
2017	10,222	1,254	8,968
2018	9,198	707	8,491
2019	10,961	779	10,182
2020	6,170	408	5,762
2021	7,334	358	6,976
2022	11,643	298	11,345
Total 2016-2022	62,739	4,411	58,328
Source: City of Seattle Quarterly Housing Report Dashboard as of April 10, 2023			

RECENT HOUSING DEVELOPMENT BY PERMIT BUILDING TYPE

Of the 62,739 new units finaled from 2016 to 2022, a total of 59,559 units (90 percent) were in mixed-use and multifamily buildings, as shown in Figure A-73. Mixed-use and multifamily buildings include units in the form of flats, townhouses, and small multiplexes (duplex, triplex and fourplexes). An additional 3,999 units (6 percent) were detached homes. The remaining 2,173 units (4 percent) were built as Detached Accessory Dwelling Units (DADUs) or Attached Accessory Dwelling Units (AADUs) AADUs, which can be attached to either detached homes or townhouses.

Despite the largest proportion of demolished units being detached homes, Seattle still saw a net gain in the number of detached home units. In juxtaposition, there was a minor net loss of units in "institutional, industrial, or other" forms of housing over this period, which accounts for housing types such as caretaker units and live-work units.

Figure A-72
Housing Development by Housing Type, January 2016 – December 2022

Unit Type	New Units Finaled	Demolitions	Net New Units
Total Units:	62,739	4,411	58,328
Multifamily	11,705	1,490	10,215
Mixed-use	44,854	257	44,597
Detached	3,999	2,518	1,481
DADU	1,102	17	1,085
AADU	1,071	24	1,047
Institutional, industrial, or other	8	105	(97)

Source: City of Seattle Quarterly Housing Report Dashboard as of April 10, 2023

RECENT HOUSING DEVELOPMENT BY SIZE OF BUILDING

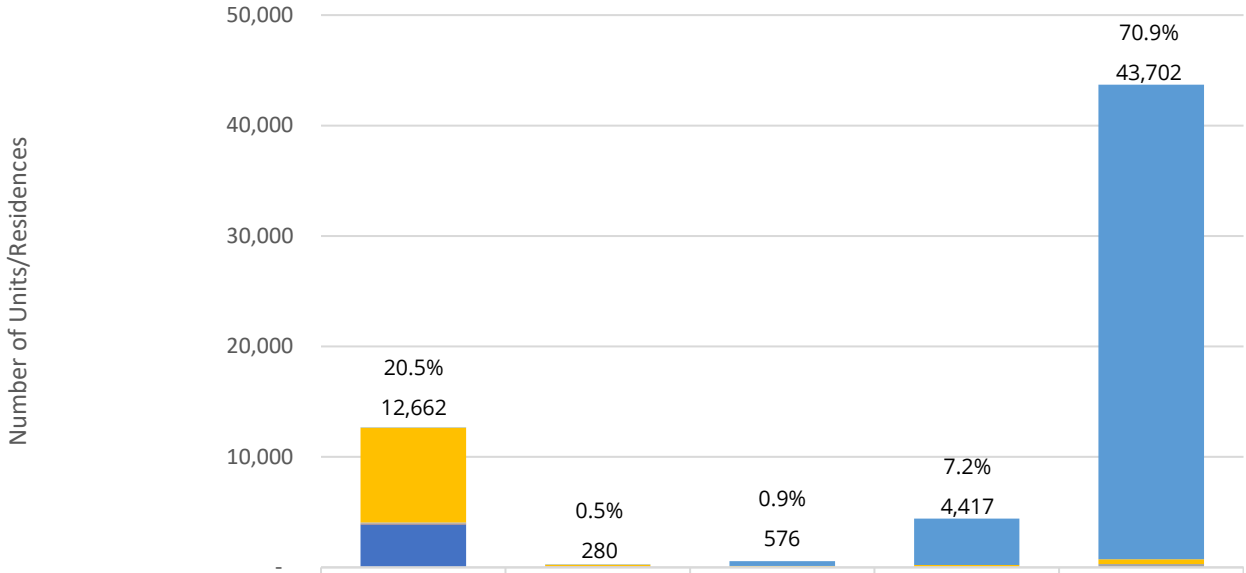
This section and the following utilize King County Department of Assessments data to estimate housing development, which produces slightly different estimates to the prior section which utilizes City of Seattle permit data but allows for more insights into recent housing development.

Housing unit development was concentrated in buildings with 50 or more units from 2016 to 2022. Almost 71 percent of units produced were in buildings with more than 50 units, nearly all of which were flats.

Figure A-74 shows that only 7 percent of units developed over this period were in buildings with 20 to 49 units, which were also nearly entirely flats. One-unit homes make up about 20 percent of units in recently developed, with double the number of attached townhomes developed than detached homes.[78] Furthermore, very few buildings with between 2 and 19 flats were developed over this period.

[78] As is pointed out in a prior section, one-unit townhouses are those which, in reality, are attached to neighboring townhouses, but these townhouse units sit upon separate townhouse plats. Some townhomes and detached homes are categorized in the Assessor's data as being in a building with more than one unit; these may have characteristics such as having an attached accessory dwelling unit. Many detached homes with accessory dwelling units are characterized as townhomes by the County, which is why these numbers are inconsistent with the permitting about AADUs.

Figure A-73
Seattle's Recent Housing Development by Units in Building



	One Unit	2 to 4 Units	5 to 19 Units	20 to 49 Units	50 Units and Up
Flat	3	45	444	4,211	42,969
Townhouse	8,579	138	116	168	419
Live & Work Unit	138	-	16	38	314
Duplex, Triplex & Fourplex	39	44	-	-	-
Detached Home	3,903	53	-	-	-

Source: King County Department of Assessments, compiled by City of Seattle, July 2022.

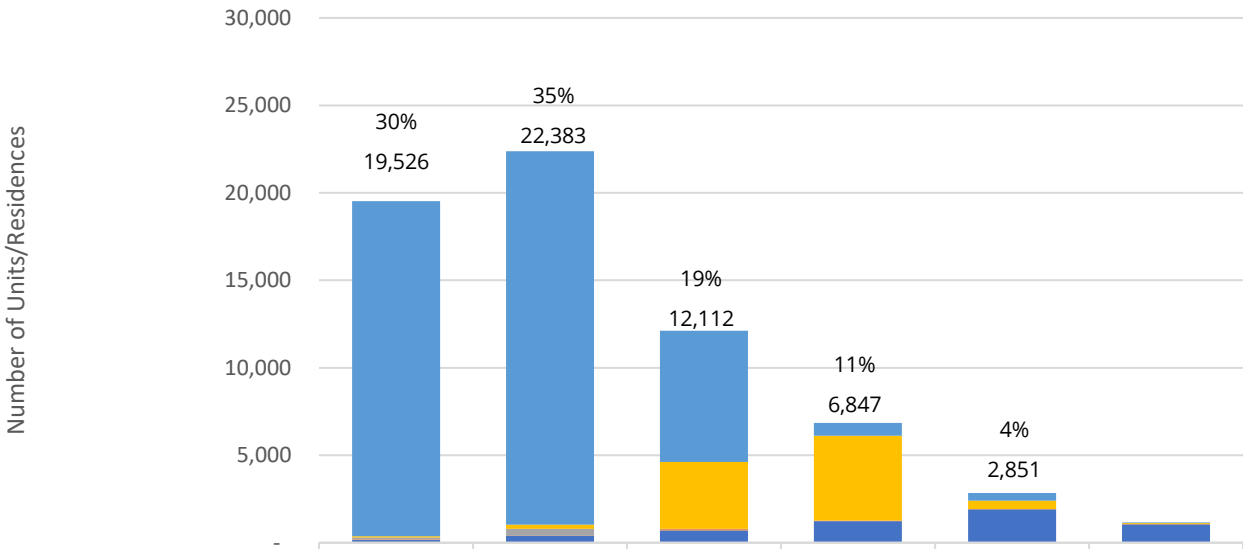
RECENT HOUSING DEVELOPMENT BY NUMBER OF BEDROOMS

Figure A-75 shows that zero- and one-bedroom units made up most of the housing developed from 2016 to 2022. One-bedroom flats comprised the largest share of recently developed units, with 0-bedroom flats, such as studios and efficiency dwelling units, comprising the second largest share. Together 0-bedroom and 1-bedroom made up 65 percent of unit production during this period, with nearly all being flats.

Approximately 19 percent of units produced during this period were 2-bedroom units. While flats constitute most of the 2-bedroom units developed, townhomes were also a significant portion.

Very few flats with 3 or more bedrooms were produced over this period. Most townhomes developed over this period had 2 or 3 bedrooms, while more than three-quarters of detached homes produced over this period had 3 or more bedrooms. Nearly all units with 4 or more bedrooms were developed in detached housing.

Figure A-74
Seattle's Recent Housing Developments by Number of Bedrooms and Housing Type



	0 Bedroom	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom	5+ Bedrooms
Flat	19,148	21,350	7,496	723	448	29
Townhouse	69	237	3,825	4,861	477	60
Live & Work Unit	126	360	24	-	-	-
Duplex, Triplex & Fourplex	26	23	64	28	13	9
Detached Home	157	413	703	1,235	1,913	1,053

Source: King County Department of Assessments, compiled by City of Seattle, July 2022

Housing Market Overview

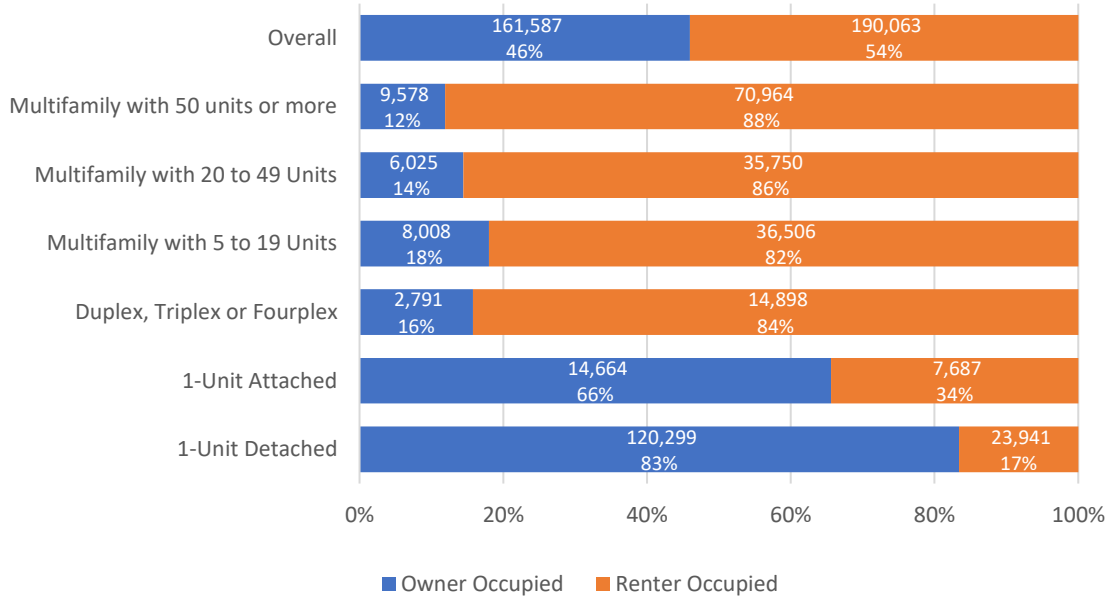
This section looks at the local housing markets for both rental and ownership housing that is not income restricted. Understanding the underlying market data provides key insights into the costs of certain housing forms, as well as homeownership and renting.

At any given time, only a small portion of the overall housing supply is available to be newly leased or sold to households in the housing market. Many units that are available for sale or lease are also occupied by existing renters or owners. Approximately 91.4 percent of all Seattle's 385,000 units were occupied full-time in 2021 according to the ACS, accounting for about 352,000 households. [79]

[79] The Census Bureau's definition for housing units excludes group quarters (e.g., college dormitories, skilled nursing facilities, and facilities for people experiencing homelessness) where people reside or stay in a group arrangement. For more on the Census Bureau's classification of living quarters as either housing units or group quarters, see American Community Survey and Puerto Rico Community Survey 2021 Subject Definitions (census.gov), pages 7-10.

While 8.6 percent of the total housing units in the city were vacant, only about half of those units were vacant and being offered for rent or sale.[80]

Figure A-75
Tenure in Seattle's Occupied Housing Units



Source: American Community Survey 2021 1-Year Estimates, Table B25032

Note: The ACS does not differentiate mixed-use buildings, which occur in all building forms, but mostly in buildings with more multifamily flats.

As shown in Figure A-76, a majority (54 percent) of all Seattle households are renters. Households in multifamily and mixed-use buildings (which typically contain flats) and small multiplexes are much more likely to be renters than owners.[81] This is related to the fact that a large proportion of multifamily units are rental apartments rather than condominiums. In comparison, households in attached homes (e.g., townhouses and rowhouses) and detached homes are predominately owner-occupied.

[80] The other half of vacant units in the city were recently rented or sold but not yet occupied; unoccupied due to being only for seasonal, recreational, or occasional use, or unoccupied for another reason such as undergoing repairs or renovation.

[81] Multifamily units in the ACS may be in multifamily buildings as well as mixed-use buildings.

OWNERSHIP MARKET

This section of the Housing Appendix looks at value, pricing, and income to better understand Seattle's ownership market. Households able to enter and maintain homeownership receive benefits in the form of housing stability and potential to accrue household wealth.

Home Values

The Zillow Home Value Index (ZVHI) provides estimates of the typical market value of all homes in Seattle.[82] The ZHVI valued the typical detached home in Seattle at $945K in 2022, and the typical multifamily condominium at $509K.

When looking at the value by number of bedrooms in Figure A-77, regardless of ownership or building form, the value of Seattle homes sharply increases as the number of bedrooms increases. This makes Seattle's housing market especially difficult for young households with children to enter homeownership, potentially pushing them to other markets in the region.

Figure A-76
2022 Average Monthly ZVHI by Number of Bedrooms

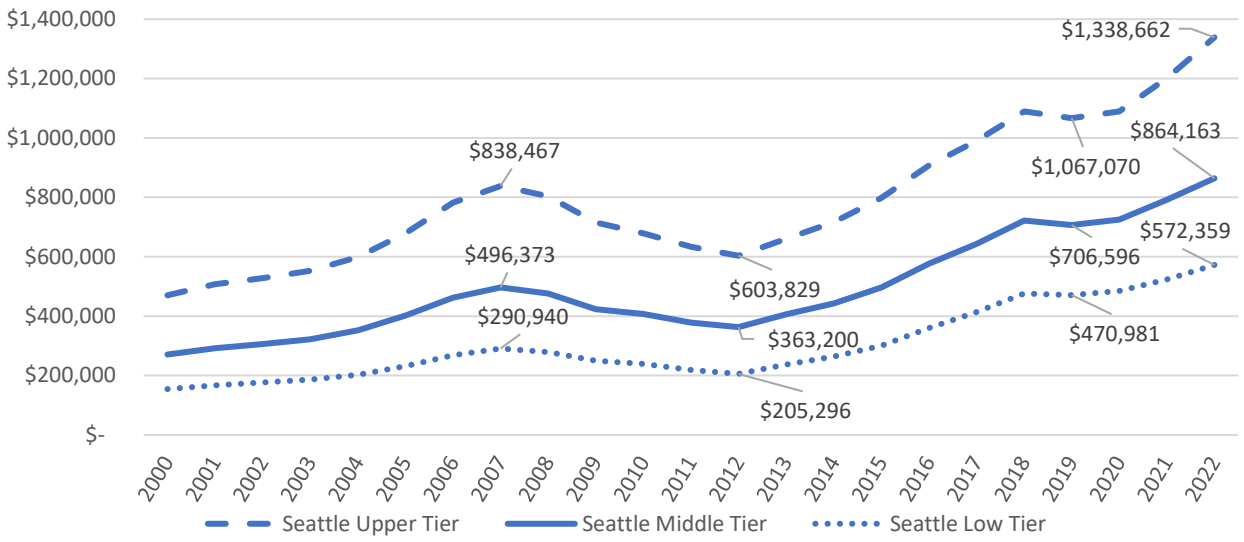
1 Bedroom	2 Bedrooms	3 Bedrooms	4 Bedrooms	5+ Bedrooms
$467,435	$710,523	$933,231	$1,192,120	$1,351,468
Source: Zillow Home Value Index for 2022; Annual averages of monthly Zillow Home Value Index prepared by OPCD				

Furthermore, Zillow produces value estimates based on the upper, middle, and lower thirds of the market (referred to as 'tiers'), regardless of building form. Figure A-78 shows that the typical home in Seattle, referred to as "middle tier", was valued at $864K in 2022. Upper tier homes had a typical value of $1.339M, while the lower tier had a value of $572K.

Figure A-78 shows the rapid increase in home values that have occurred since the Great Recession. In just a decade the value of upper tier homes doubled, while lower and middle tier home values more than doubled. The rapid increase in home values has a dual effect of producing wealth for homeowners, while also becoming increasingly difficult for buyers in the market – in particular first-time homebuyers and homebuyers with moderate incomes.

[82] Zillow tracks recent sales and variations in number of bedrooms, building forms, and market price segment. Numbers presented in this section are 12-month averages of the monthly Zillow Home Value Index.

Figure A-77
Zillow Home Value Index for Seattle, 2000 to 2022 Annual Averages



Source: Zillow Home Value Index for Cities and Counties as of May 2023

Notes: Annual averages of monthly Zillow Home Value Index prepared by OPCD

Recent Sales Prices by Age and Size of Housing

This section focuses on housing prices of homes sold in Seattle in 2022. We separate the data based on form of ownership and building type, first providing some context for background.

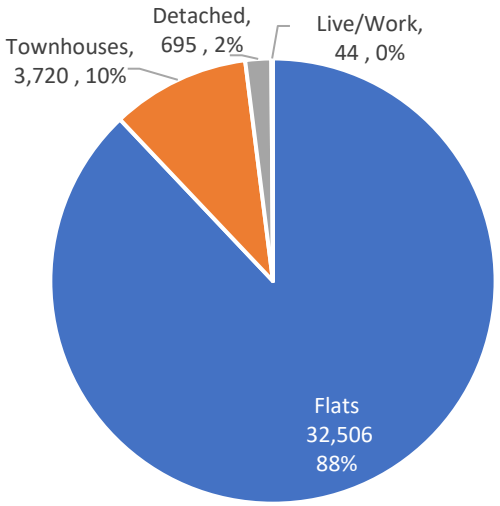
Forms of ownership include fee-simple ownership and condominium ownership. Fee-simple ownership is when a housing unit is sold and owned with the land. Our analysis includes fee-simple detached homes and attached townhomes.

Condominium ownership is a form of homeownership in which multiple units are sold and owned separately, but owners have community interest in the land or community property that is held by an association (i.e., a homeowner's association or condominium board). As shown in Figure A-79, while most condominiums in Seattle are flats, there are also condominiums that come in other building forms including townhouses, detached homes, or live/work units.

For this analysis, we further break down ownership types based on building form. We consider detached homes as well as townhomes that are sold fee simple. We consider condominium ownership in Accessory Dwelling Units (ADUs), principal dwelling units, and multifamily units, which

primarily includes flats but with some townhomes. [83] Condominiumized ADUs and principal dwelling units, which are detached homes with slightly larger floor areas that share lots with one or more ADU, are newer forms of for-sale condominium housing in Seattle.

Figure A-78
Condominiums by Building Form in Seattle



Source: King County Department of Assessments, compiled by City of Seattle, July 2022

Figure A-80 shows that the sales prices of all condominium types are less than for detached homes. Fee-simple townhouses are less expensive than detached homes and principal dwelling units, yet more expensive than ADUs and multifamily units. This is, in part, related to the relative size of townhouses, their smaller lot sizes, and their use of shared walls.

We also segment 2022 sales data by the age of housing units, looking at sales of units less than 10 years old to better understand new development and more than 30 years old to understand pricing for a large portion of Seattle's housing supply. Figure A-80 shows that the median sales price of units in older buildings is less than in newer buildings, particularly for detached homes and multifamily condominiums. Detached homes built in the last 10 years have the highest median sales price of any group, and the highest average number of bedrooms (3.9) and average square footage (2,816 SF).

In comparison, ADUs are the least expensive form of housing less than 10 years old. We find that the median price for ADUs (all of which were less than ten years old) was less than half the price of a detached home less than 10 years old, and about 70 percent of the price of detached homes older

[83] Seattle's Neighborhood Residential zones currently allow two ADUs on every lot, but minimum lot sizes do not allow these units to be subdivided and sold "fee simple" as separate individual tax lots. Given these constraints, some recently constructed ADUs and the principal detached home on the lot are being offered for sale as condominiums. They typically resemble traditional condominiums in square footage and number of bedrooms.

than 30 years. The median price of principal dwelling units less than 10 years old was two-thirds the cost of detached homes less than 10 years old but were higher in cost than detached homes over 30 years old. It is worth noting that ADUs and principal dwelling units are both small as a share of all homes sold in 2022 and account for a tiny fraction of the overall housing supply.

The lowest median sales price among all units is in multifamily units older than 30 years, but these units, like ADUs, are some of the smallest forms of homes sold in terms of unit size and number of bedrooms, limiting their suitability for larger households, such as families with children and other multiple-generation households.

Figure A-79
2022 Median Sale Prices by Unit Age and Size

	Median Sales Prices in 2022			Number of Units in Sample		
Ownership and Unit Type	All Units	Less than 10 Years Old	Over 30 Years Old	All Units	Less than 10 Years Old	Over 30 Years Old
Fee Simple Ownership						
Detached Home	$1,060,000	$1,610,000	$995,000	4,786	410	3,860
Townhouse	$816,250	$830,000	$749,900	2,042	1,390	25
Condominium Ownership						
Accessory Dwelling Unit	$757,500	$757,500	-	104	104	-
Principal Dwelling Unit	$1,176,500	$1,176,500	-	68	68	-
Multifamily Unit	$512,500	$759,000	$495,000	2,581	363	443
Size of Units Sold in 2022						
	Average Net Square Feet			Average Number of Bedrooms		
Unit Type	All Units	Less than 10 Years Old	Over 30 Years Old	All Units	Less than 10 Years Old	Over 30 Years Old
Fee Simple Ownership						
Detached Home	1,980	2,816	1,802	3.3	3.9	3.2
Townhouse	1,434	1,427	1,962	2.7	2.6	2.4
Condominium Ownership						
Accessory Dwelling Unit	1,000	1,000	-	2.0	2.0	-
Principal Dwelling Unit	2,126	2,126	-	3.5	3.5	-
Multifamily Unit	924	929	916	1.5	1.7	1.5

Source: King County Recorded Sales, prepared by OPCD as of February 2023

Notes: Sample size is limited based on the recording and documentation of sales and parcel data as of February 2023, which may result in leaving out some newly built units. Principal dwelling units and ADUs that are condominiumized and sold separately are determined based on the 1,000 square foot ADU size limit, plus an additional 200 feet for special exceptions like ADUs above garages, or storage space. ADUs include those units that are under 1,200 square feet and are sold as separate units from the principal dwelling unit and may either be physically detached or attached to a principal dwelling unit.

Affordability Levels of Home Sale Prices in 2022

Figure A-81 shows the downpayments and monthly housing costs that could be expected for homes purchased in 2022, based on median sales prices in Figure A-80 in the immediately preceding subsection. We include two downpayment scenarios, one in which a purchaser pays a 20 percent downpayment, which is a typical recommended amount that avoids private mortgage insurance, and one in which a purchaser pays a 5 percent downpayment, closer to what we may expect for first-time homebuyers.[84] Downpayment and monthly costs have an inverse relationship; that is, if a household wants to have a lower monthly payment, they will require a larger downpayment.

Differences in household wealth influence a household's ability to provide a downpayment. Wealth comes from various places, such as equity from a home the household intends to sell, generational wealth from inheritance or familial gifts, or savings accounts and investments.

Downpayment costs can be prohibitive for households with limited access to wealth, an issue that is more acute for people of color, who have systemically been denied opportunities to gain and pass down wealth throughout Seattle's and this nation's history. In 2019 U.S. Black households had an average of $24,100 in net worth, while white households had an average of $189,100.[85] Furthermore, a 2021 study of Seattle found that people-of-color households—especially Black households—are more likely than white households to be both asset poor and have zero net worth.[86]

Among the building forms and scenarios in Figure A-81, downpayments are highest among detached homes less than 10 years old and lowest among multifamily condominiums over 30 years old. Monthly costs, which also account for homeowners' insurance, taxes, condominium dues, and private mortgage insurance (where necessary), are lowest among ADUs while highest among detached homes less than 10 years old. [87] Color scales of red to green show highest to lowest costs options.

[84] In addition, closing costs between 2 and 5 percent may double a household's upfront costs due at closing, depending on the amount of downpayment. We do not account for closing costs in this model.

[85] The Board of Governors of the Federal Reserve System publishes estimates for Net Worth by Race or Ethnicity. These estimates were last released for the year 2019. In addition to the statistics above, Hispanic households had $36,050 in wealth while households of any other race had a net worth of $74,500.

[86] Prosperity Now prepared The Racial Wealth Divide in Seattle report in 2021. The authors of this report calculate Households with Zero Net Worth and an Asset Poverty Ratio, which is the percentage of households without sufficient net worth to subsist at the poverty level for three months in the absence of income.

[87] Private Mortgage Insurance is generally charged with downpayments lower than 20% of the home purchase price. Therefore, we only apply it to the model with a 5% downpayment.

Figure A-80
Downpayment and Monthly Costs of Homes by Unit Type in 2022

Downpayment						
	20% Downpayment			5% Downpayment		
Unit Type	All Units	Less than 10 Years Old	Over 30 Years Old	All Units	Less than 10 Years Old	Over 30 Years Old
Fee Simple Ownership						
Detached Home	$212,000	$322,000	$199,000	$53,000	$80,500	$49,750
Townhouse	$163,250	$166,000	$149,980	$40,813	$41,500	37,495
Condominium Ownership						
Accessory Dwelling Unit	$151,500	$151,500	-	$37,875	$37,875	-
Principal Dwelling Unit	$235,300	$235,300	-	$58,825	$58,825	-
Multifamily Unit	$102,500	$151,800	$99,000	$25,625	$37,950	$24,750
Monthly Costs of Homes						
	With a 20% Downpayment			With a 5% Downpayment		
Unit Type	All Units	Less than 10 Years Old	Over 30 Years Old	All Units	Less than 10 Years Old	Over 30 Years Old
Fee Simple Ownership						
Detached Home	$6,386	$8,947	$5,968	$8,328	$11,667	$7,782
Townhouse	$5,417	$5,434	$5,520	$7,018	$7,041	$7,152
Condominium Ownership						
Accessory Dwelling Unit	$4,112	$4,112	-	$5,322	$5,322	-
Principal Dwelling Unit	$7,308	$7,308	-	$9,484	$9,484	-
Multifamily Unit	$4,235	$5,719	$4,240	$5,416	$7,351	$5,426

Source: King County Recorded Sales, prepared by OPCD as of February 2023

Notes: Assumptions include a 30-year mortgage at a 6% interest rate. An annual property tax levy of 8.8294 mills for Seattle in 2022 was assumed alongside a fee rate of 1 mill to cover any fire district or other fees the County applies to homes. Homeowners insurance was assumed to be $2 per year for every $1,000 of sale price. For the 5% downpayment model, private mortgage insurance at 1% of the home value per year was applied. We apply a monthly condominium fee of $150 to townhouses, principal dwelling units, and ADUs, and $350 to multifamily units.

Figure A-82 further presents this analysis by showing the minimum income, as a percent of AMI, that household would need to spend no more than 30 percent of their household income on monthly housing costs, which is a benchmark for what is generally considered affordable. This portion of the analysis is based on the monthly cost of a home under both downpayment scenarios. Key findings from this analysis include:

- Based on this analysis, a household earning between 100 and 120% of AMI would find that only smaller and older multifamily units are affordable to their income, but this would only be the case if they had been able to make a 20% downpayment of approximately $100,000.

Multifamily units also tend to be smaller units, as shown in Figure A-80, and typically share land and amenity costs.

- Many forms of housing, such as detached homes, are only considered affordable to households with incomes at or above 120% of AMI. Detached homes and principal dwelling units require income as much as two or three times the area median income. Townhouses and ADUs also require incomes that are well above 120% of AMI.

Figure A-81
Income as a Percent of AMI Necessary to Afford Monthly Costs of Homes

	With a 20% Downpayment			With a 5% Downpayment		
Unit Type	All Units	Less than 10 Years Old	Over 30 Years Old	All Units	Less than 10 Years Old	Over 30 Years Old
Fee Simple Ownership						
Detached Home	164%	236%	153%	214%	308%	200%
Townhouse	131%	134%	147%	169%	173%	190%
Condominium Ownership						
Accessory Dwelling Unit	142%	142%	-	183%	183%	-
Principal Dwelling Unit	194%	193%	-	251%	251%	-
Multifamily Unit	119%	163%	112%	152%	208%	142%

Source: King County Recorded Sales, prepared by OPCD as of February 2023; HUD 2022 AMI.

Notes: Income necessary to afford each unit is a weighted average of bedroom-adjusted AMI using 1 person for a 0-bedroom unit, and 1.5 persons per bedroom thereafter. Elsewhere in this Housing Appendix we use 2023 HUD HAMFI, whereas in this analysis we use 2022 HUD HAMFI, as this analysis uses 2022 King County Recorded Sales.

Monthly Costs of Homeownership and Racial and Social Equity

The affordability of housing is also a racial equity issue due to the legacy and continuation of systemic racism.

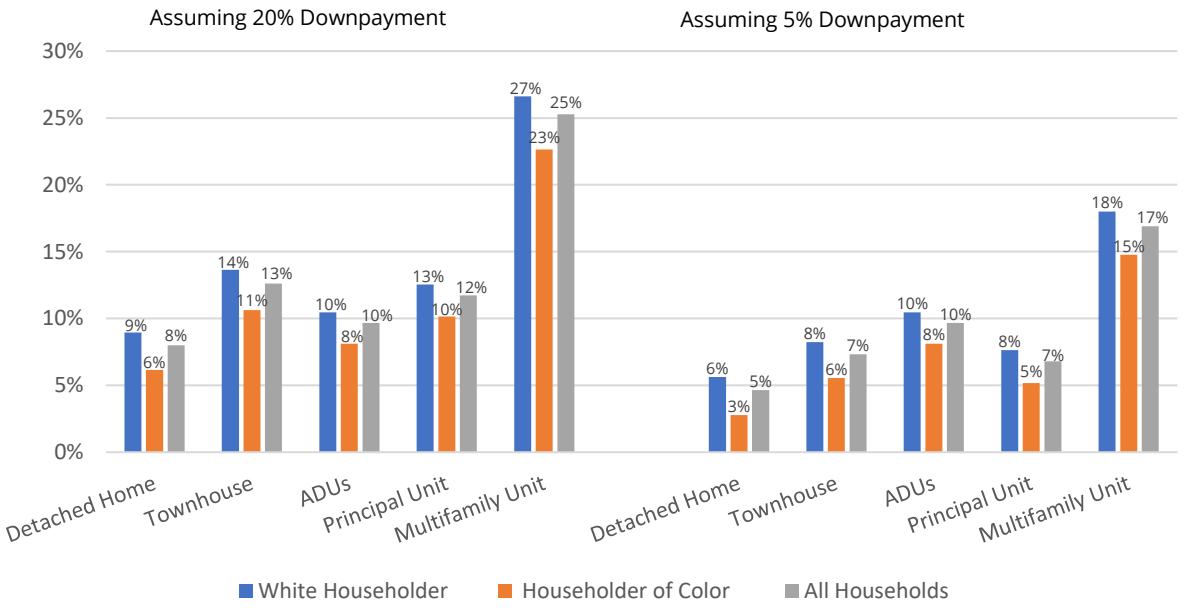
First, people of color have less wealth with which to purchase a home, as pointed out in the previous section. As a result, many can only make a lower downpayment or they may be unable to attain a mortgage at all.

Second, people of color have lower incomes with which to cover the monthly costs of homeownership. The combined disparities in wealth and income make purchasing a home particularly difficult for people of color compared with white households, especially in a high-cost market like Seattle.

Using data from 2022, Figure A-83 shows the racially disparate outcomes in who can afford the monthly costs of different housing forms based on the prices in "all units" in Figure A-80 in the preceding section. Overall, this analysis shows that most Seattle residents have incomes that render purchasing any type of home out of reach. This ranges from only 5 percent of Seattle households

had the income necessary to afford monthly costs of a detached home purchased with a 5% downpayment to 27 percent of all households with incomes sufficient to afford a condo purchased with 20% downpayment. Households of color lagged white households by between 2 and 4 percent in ability to afford monthly ownership costs.

Figure A-82
Share of Seattle Households Who Could Afford the Monthly Costs of a Median Home Purchased in 2022



Source: King County Recorded Sales, prepared by OPCD as of February 2023. U.S. Census Bureau 2017-2021 5-Year Public Use Microdata Samples; IPUMS-USA.

Notes: Median prices for properties of all ages in Figure A-80 used as input. Assumptions to determine income necessary to afford the monthly housing costs are the same as in Figure A-81. 2016-2021 5-Year PUMS are advanced to 2022 using the Federal Reserve Bank of Atlanta's Wage Growth Tracker for overall hourly workers over the 12-month period prior to June 2022.

RENTAL MARKET

To analyze Seattle's rental market, we use data from the ACS and from the CoStar real estate analytics company.[88] While these sources are very different in terms of both the methodology for collecting data, both of these sources are useful, with each providing important insights into Seattle's housing market.

When considering findings based on the ACS it is essential to keep in mind that the ACS estimates incorporate both rental units that are subsidized to provide affordable units as well as unsubsidized market rental units.[89]

Also of note, the ACS provides detail on the single unit and small multiplex (duplex, triplex and fourplex) segments of the rental market which are not covered by CoStar and other real estate analytics companies. These are important segments of the rental market, with the ACS estimating that 13 percent of renter households (24,000 households) rent detached 1-unit homes, 4 percent (7,000 households) rent attached 1-unit homes (such as townhouses, rowhouses), and 9 percent (16,000 households) rent units in small multiplexes.

Rental housing makes up the majority of Seattle's growing housing supply. The 2021 ACS estimates that 190,000 households—54 percent of all households in Seattle—rent the home in which they live.

Figure A-84 provides ACS estimates of median monthly gross rents (which include the monthly cost of rent and basic utilities) paid by Seattle households in units in buildings of different sizes. Because these estimates incorporate both market rate units and rent- and -income restricted units, they show lower rents than would be found if we were examining rents in unrestricted units. Findings from the ACS data include:

- Detached homes rented for a median price 43 percent higher than the overall median gross rent in the city in 2021. These rents are higher, in part, due to larger unit sizes, but also due to having private outdoor space, and the neighborhood locations where they are located.
- The median gross rent in attached homes, which includes townhomes and rowhouses, was 24 percent higher than the citywide median.
- Only units in small multiplexes, multifamily buildings with 5 to 19 units, and multifamily buildings with 20 to 49 units had lower median rents than the citywide median. This relates, in part, to the fact that these properties tend to be older than larger multifamily properties.

[88] In contrast to the ACS, which collects data from approximately 1 percent of all households per year and releases data after a substantial time lag for processing, CoStar regularly collects and quickly releases data from apartment complex property owners and managers to understand local real estate markets.

[89] The Census Bureau does not distinguish between subsidized and unsubsidized units in either collecting or reporting the ACS data.

- Multifamily buildings with 50 units or more had median gross rents similar to the overall median in the city. The higher rents found in large multifamily buildings compared to smaller ones are correlated with the fact that larger buildings are generally newer and therefore have a price premium. In addition, larger buildings tend to also be taller, requiring more expensive materials such as steel or concrete framing.[90]

Figure A-83
Median Monthly Gross Rent

Size and Type of Building in Which Renter-Occupied Unit is Located	Percent of Renter Households	Average Number of Bedrooms	Median Monthly Gross Rent in 2021 (PUMS)	Difference from Overall Median Gross Rent
1-Unit, Detached	13%	3.9	$2,567	44%
1-Unit, Attached	4%	3.3	$2,233	25%
Small multiplex (Duplex, Triplex, Fourplex)	9%	2.8	$1,674	-6%
Multifamily with 5 to 19 units	20%	2.3	$1,618	-9%
Multifamily with 20 to 49 units	19%	2.0	$1,618	-9%
Multifamily with 50 units or more	36%	1.9	$1,902	6%
All renter-occupied units	100%	2.4	$1,787	-

Sources: U.S. Census Bureau American Community Survey 5-Year Public Use Microdata Sample (PUMS) estimates for 2017-2021; IPUMS USA; Seattle Office of Planning & Community Development
Note: Median monthly rents are in 2021 dollars

Median Gross Rents by Number of Bedrooms

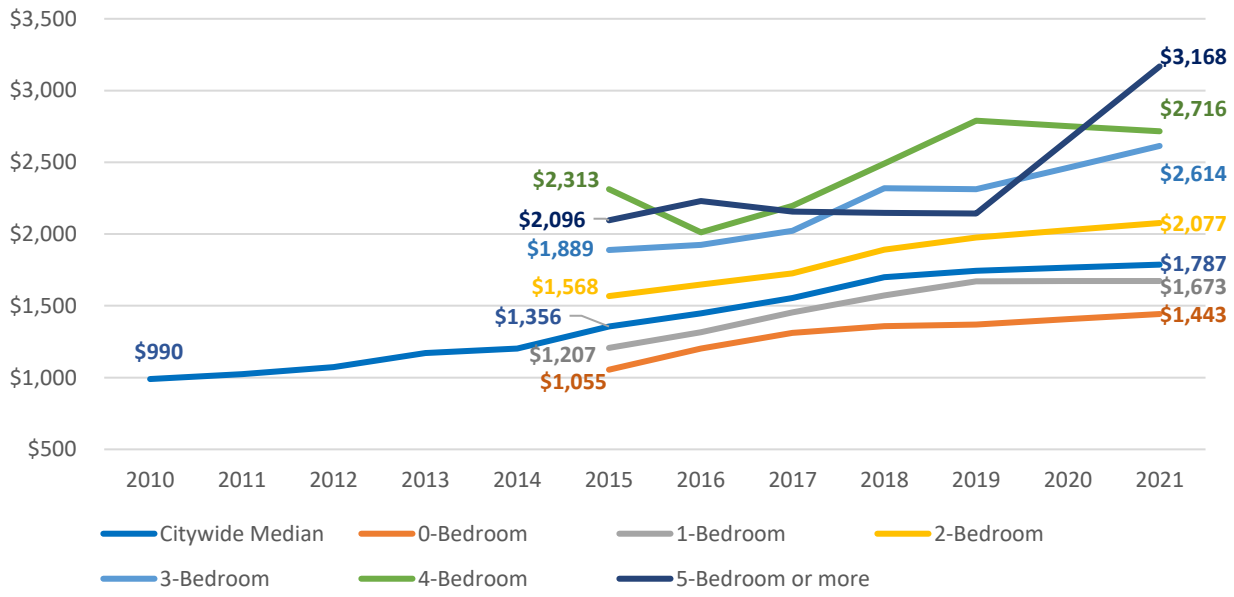
Figure A-85 presents estimates from the ACS to show how median gross rents have varied over time and by number of bedrooms in Seattle. These estimates include all building forms. Between 2010 and 2021, Seattle's median gross rent increased by $797 per month, equating to an 81 percent increase. Adjusting for inflation finds that this still constitutes an increase of $550 (45 percent).

The ACS also began providing median gross rent for units by number of bedrooms in 2015. Looking at these estimates gives us the following insights:

[90] In "Making apartments more affordable starts with understanding the costs of building them" (2020), Hannah Hoyt and Jenny Schuetz at the Brookings Institute present the cost per square foot of buildings by height and size, making note that costs escalate as the scale of residential buildings increase, in particular due to the hard costs of development.

- Zero-bedroom units, such as studios and small efficiency dwelling units, typically have median rents $300 lower than the citywide median. 1-bedroom median gross rents were approximately $100 less than the citywide median in 2021.
- At $2,077 per month in 2021, 2-bedroom rents were approximately $300 more than the citywide median and $400 more than the median 1-bedroom.
- Rents for units with 3 bedrooms have increased more rapidly than the overall median rent in the city. While 3-bedroom rents were approximately $500 more expensive than Seattle's median gross rent in 2015, they were $800 more expensive in 2021.

Figure A-84
Median Gross Rents by Number of Bedrooms Over Time



Source U.S. Census Bureau American Community Survey 1-Year Data

Notes: Due to COVID-19, The U.S. Census Bureau did not release 2020 1-Year ACS data. 2020 data presented are thus a middle point between 2019 and 2021 and may not reflect costs reductions or increases that households experienced in 2020. The estimates for 4-Bedroom and 5+ Bedroom apartments carry high margins of error due to the limited sample size, which may impact data reliability.

Median Gross Rents and Racial Equity

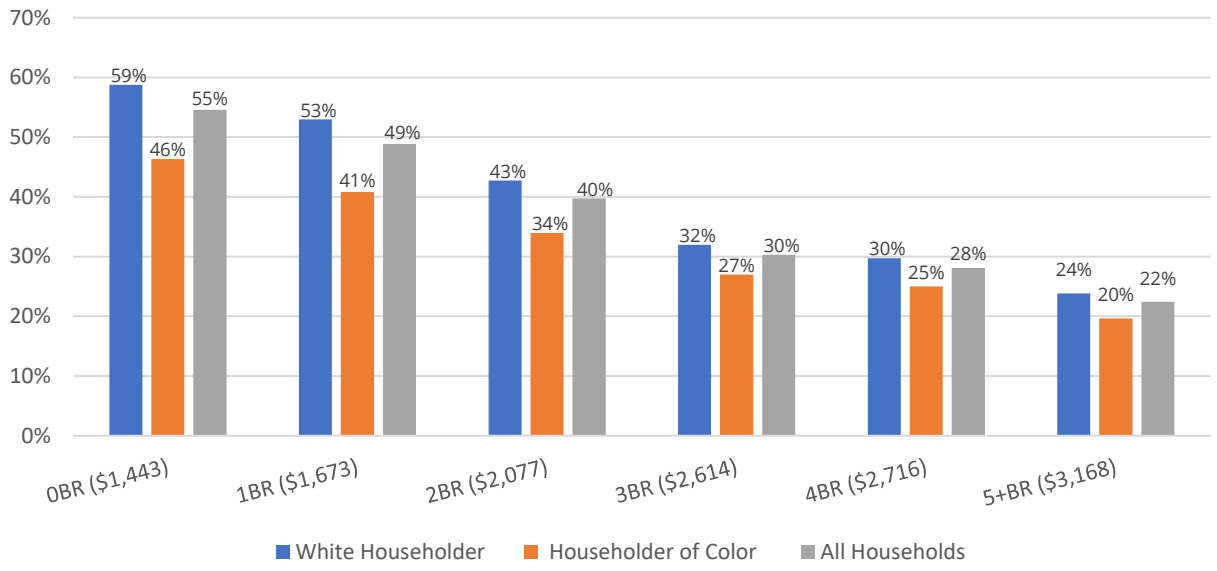
Figure A-86 uses the ACS estimates of median gross rents charged in 2021 along with ACS data on incomes to estimate the share of all Seattle households that could afford Seattle rents. Given that rents typically increase with the number of bedrooms in a unit, the share of households able to afford apartment rents generally declines as the number of bedrooms increases.

However, household incomes do not increase uniformly with household sizes. For example, a household comprised of a single parent with multiple children is likely to have a substantially lower income—and is thus likely to be able to afford much lower rents—than a similarly sized or smaller household that contains multiple adult earners.

Furthermore, there is a 13 percent difference in the share of households who can afford a 0-bedroom unit when considering if the householder is white or a person of color. While the percentage-point disparity decreases as the number of bedrooms increases, the overall share of Seattle households able to afford larger units also decreases. Just 43 percent of white householders can afford the typical 2-bedroom rental unit, while only 34 percent of householders of color can, and even fewer households of each group can afford the average 3-bedroom.

It is worth highlighting that this analysis considers the income distribution of owner and renter households in aggregate. If this analysis were constrained to consider only the incomes of renter households, it would show far lower shares of households able to afford these rents.

Figure A-85
Share of Seattle Households Who Could Afford Median Gross Rents in Seattle in 2021



Source: Rents from U.S. Census Bureau American Community Survey 1-Year Data; Incomes from U.S. Census Bureau 2017-2021 5-Year Public Use Microdata Samples; IPUMS-USA.

Affordability Levels of Apartment Rents

Figure A-87 presents estimates from CoStar to show how median rents in Seattle apartments vary by building age and by number of bedrooms. [91] The rents we are reporting here are median gross

[91] Age presented as part of the Costar Multifamily analysis refers to the year the building was built or most recently renovated, therefore similar to effective year built in the Housing Supply analysis.

rents, which are the effective contract rents of market-rate apartment units plus estimated tenant-paid utilities.[92]

Key takeaways from this analysis include:

- Apartments over 30 years old play a significant role in housing affordability in Seattle, with effective rents ranging between $220 to $650 per month less than the median of all units with the same number of bedrooms.
- Larger units are a small share of the overall apartment market in Seattle and are significantly more expensive than smaller units.
- In buildings that are less than 10 years old, the median rent for a 3-bedroom apartment, of which there are only 481 units in this analysis, was over $5,000.

Figure A-86
Median Gross Rents by Number of Bedrooms in the Apartment

	Median Gross Rent (February 2023)			Number of Units in CoStar Sample		
Number of Bedrooms	All Units	Less than 10 Years Old	Over 30 Years Old	All Units	Less than 10 Years Old	Over 30 Years Old
0 Bedroom (studios, small efficiency dwelling units)	$1,506	$1,600	$1,290	28,806	15,845	7,458
1 Bedroom	$2,062	$2,298	$1,569	60,032	31,022	17,871
2 Bedroom	$2,733	$3,257	$2,084	24,281	10,152	8,442
3 Bedroom	$3,240	$5,052	$2,724	1,383	481	604
All	**$2,087**	**$2,321**	**$1,629**	**114,610**	**57,515**	**34,459**

Sources: CoStar Group, www.costar.com; ACS 5-Year PUMS 2017–2021 prepared by City of Seattle OPCD

Notes: Median gross apartment rents are calculated using CoStar Effective Rents for apartments described in Footnote 92 and ACS PUMS estimates of tenant-paid utilities by the number of bedrooms.

[92] Sample is limited to market-rate or mixed market-affordable multifamily apartment buildings. Only properties with 5 or more units, which are typically CoStar's market focus, with current rent data are included. Further exclusions include cooperatives, dormitories, student housing, congregate housing, condominiums, corporate housing, and military housing. Effective rent estimates incorporate adjustments prorated over the lease term for concessions paid for by the landlord and for certain operating costs for which landlords charge tenants Additional details can be found in the "effective rent" description in CoStar's glossary.

Estimates of tenant-paid utilities are created by using 2017-2021 5-Year Public Use Microdata Samples from IPUMS USA, University of Minnesota, www.ipums.org. Estimates of tenant-paid utilities are created for renter households by the number of bedrooms in the unit, then advanced to 2023 using mid-year CPI-U.

Figure A-88 compares median gross rent data for February of 2023 to maximum gross rents considered affordable at various percentages of area median income.[93] Key takeaways from this comparison include:

- Median gross rents, regardless of age or number of bedrooms, are not affordable to households with incomes at or below 30% of AMI or 50% of AMI. Even in older units, median gross rents are only affordable to households with incomes higher than 50% of AMI.
- Median 0-bedroom rents, regardless of age, are affordable to households with incomes of 80% of AMI. Median gross rents of apartments with one or more bedrooms less than 10 years old are not affordable to households at 80% of AMI, while units over 30 years old are.
- Median gross rents are largely affordable to households at 100% of AMI and at 120% of AMI. The exception is that 3-bedrooms less than 10 years old are not affordable to households with incomes at or below 120% of AMI.

[93] The Housing Appendix uses the term "area median income" (AMI) to refer to HUD's estimates of Area Median Family Income (HAMFI). HUD publishes HAMFI annually for areas across the U.S.; for Seattle the applicable area is a combination of King and Snohomish counties. Calculation of maximum affordable gross rents in the figure are based on Fiscal Year 2022 HAMFI of $134,600, as the 2022 HAMFI fiscal year happened from May of 2022 to the end of March 2023, and rent data are from February 2023. We use standard adjustments to account for the number of bedrooms and assumed average household size per bedroom. Maximum affordable gross rents are equal to 30 percent of monthly household income for that AMI level.

Figure A-87
Comparison of February 2022 Maximum Affordable Gross Rent by AMI Level and Median Gross Rents for Unrestricted Apartment Units

Unit Configuration	2022 Maximum Affordable Gross Rent					Median Gross Rents by Age for Unrestricted Apartment Units		
	30% of AMI	50% of AMI	80% of AMI	100% of AMI	120% of AMI	All Units	Less than 10 Years Old	Over 30 Years Old
0-Bedroom	$707	$1,178	$1,885	$2,356	$2,827	$1,506	$1,600	$1,290
1-Bedroom	$757	$1,262	$2,019	$2,524	$3,029	$2,062	$2,298	$1,569
2-Bedroom	$909	$1,515	$2,423	$3,029	$3,635	$2,733	$3,257	$2,084
3-Bedroom	$1,050	$1,750	$2,800	$3,500	$4,200	$3,240	$5,052	$2,724

Sources: HUD MFI for Fiscal Year 2022; CoStar Group, www.costar.com (February 2023); ACS 5-Year PUMS 2017-2021

Note: Median gross apartment rents are calculated using CoStar Effective Rents for apartments described in Footnote 92 and PUMS estimates of tenant-paid utilities by the number of bedrooms.

This table is provided for general reference. See Footnote 93 for information about how HAMFI is used to calculate 2023 Maximum Affordable Gross Rents and compare to specific AMI levels. The maximum affordable rents in this table do *not* include other adjustments that HUD and other agencies make in calculating rents limits for administering affordable housing programs, as those limits vary between types of affordable housing regulatory agreements. Rent limits applicable to City of Seattle regulatory agreements are listed on the Office of Housing's website.

Another, more precise, way to analyze the underlying data is by calculating the lowest *specific* income level that would be needed for median gross rents to be affordable to a household, as shown in Figure A-89. Analyzing the data this way allows us to understand how apartments less than 10 years old, except for those that are 0-bedroom, are not affordable to households with incomes at or below 80% of AMI, while older apartments, which are a limited portion of Seattle's apartment rental market, tend to have AMI levels lower than 80% of AMI.

Figure A-88
Household Income (Percentage of AMI) Needed to Afford Median Gross Apartment Rent

Unit Configuration	All Units	Less than 10 Years Old	Over 30 Years Old
0-Bedroom	64% of AMI	68% of AMI	55% of AMI
1 Bedroom	82% of AMI	91% of AMI	62% of AMI
2 Bedroom	90% of AMI	108% of AMI	69% of AMI
3 Bedroom	93% of AMI	144% of AMI	78% of AMI

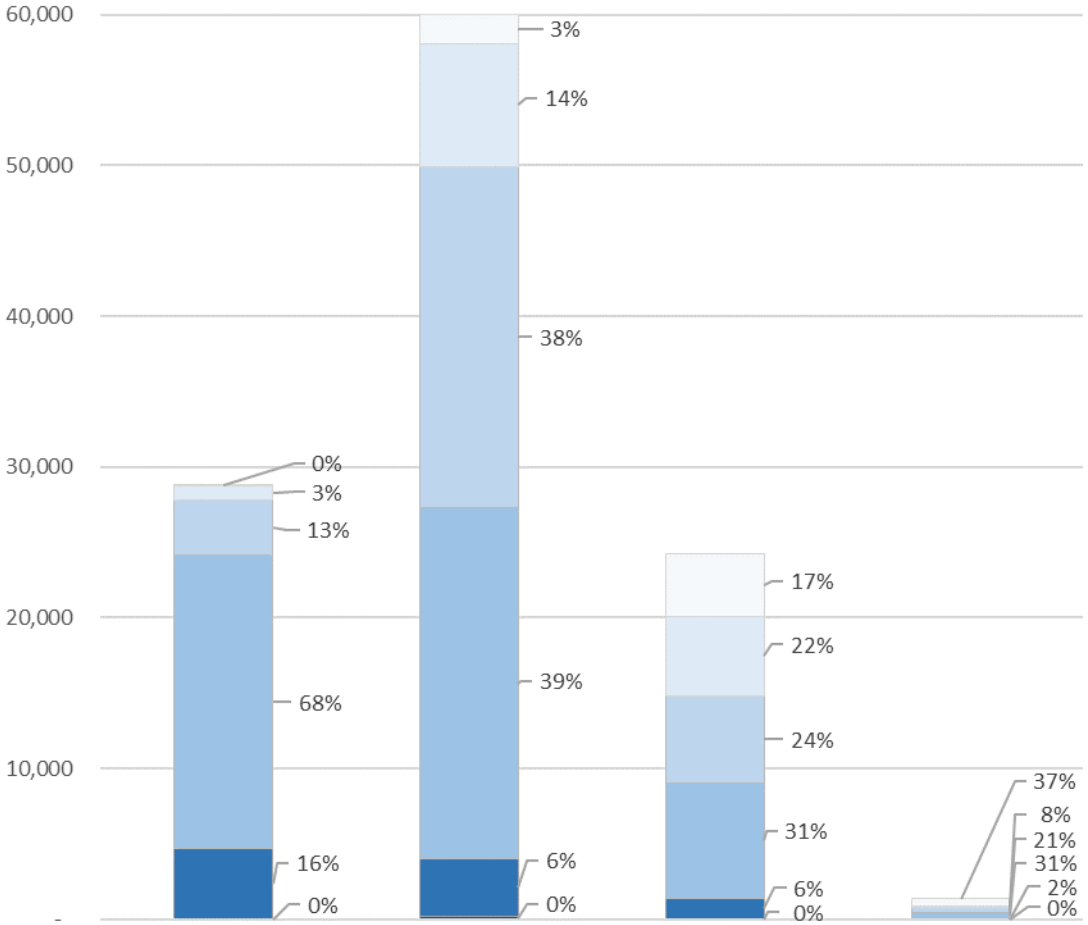
Source: HUD MFI for Fiscal Year 2022; CoStar Group, www.costar.com; ACS 5-Year PUMS 2017–2021

Notes: Median gross apartment rents are calculated using CoStar Effective Rents for apartments described in Footnote 92 and PUMS estimates of tenant-paid utilities by the number of bedrooms. See Footnote 93 for information about how HAMFI is used to calculate 2022 Maximum Affordable Gross Rents and compare to specific AMI levels.

Figure A-90 further visualizes the share of apartment units in CoStar's database affordable to varying income levels, using the maximum affordable gross rents shown in Figure A-88. Apartment units are considered affordable at an income level when the gross rent of the apartment is less than or equal to the maximum affordable gross rent of that level. Thus, the percentage of units affordable to an income level is cumulative, i.e., the total number of units that are affordable to a household at 50% of AMI includes units affordable at 50% of AMI as well as units affordable to households at 30% of AMI. Key takeaways from this analysis include:

- Out of approximately 115,000 apartment units with rent data, fewer than 250 units are affordable to households at 30% of AMI.
- Considering both affordability and unit configuration regarding number of bedrooms finds that only 8 percent of all apartment units with rent data are multi-bedroom units affordable to households with incomes at or below 80% of AMI.
- Very few apartment units are affordable to households at 50% of AMI, with most of those being 0-bedroom and 1-bedroom units. Likewise, units affordable to households at 80% of AMI are primarily 0-bedroom and 1-bedroom units.
- A greater share of multibedroom units are affordable to households at 100% of AMI; however, only 55 percent of 3-bedoom units are affordable to households at this AMI level. In addition, there are very few multibedroom units relative to 0-bedroom and 1-bedroom affordable to households at 100% of AMI.
- While most units are affordable to households at 120% of AMI, the share of units affordable at this level decreases as the number of bedrooms increases.

Figure A-89
Apartments by Number of Bedrooms and AMI-based Affordability Level



Affordability Level	0-Bedroom	1-Bedroom	2-Bedroom	3-Bedroom
Total Apartments in CoStar Sample	28,806	60,032	24,281	1,383
Up to 120% of AMI	28,731 (100%)	58,071 (97%)	20,097 (83%)	869 (63%)
Up to 100% of AMI	27,844 (97%)	49,922 (83%)	14,817 (61%)	756 (55%)
Up to 80% of AMI	24,134 (84%)	27,340 (46%)	9,059 (37%)	459 (33%)
Up to 50% of AMI	4,689 (16%)	3,983 (7%)	1,422 (6%)	25 (2%)
Up to 30% of AMI	28 (0%)	160 (0%)	22 (0%)	- (0%)

Source: CoStar Group, www.costar.com; ACS 5-Year PUMS 2017-2021

Note: Median gross apartment rents are calculated using CoStar Effective Rents for apartments described in Footnote 92 and PUMS estimates of tenant-paid utilities by the number of bedrooms. See Footnote 93 for information about how HAMFI is used to calculate 2022 Maximum Affordable Gross Rents and compare to specific AMI levels. A small number of units (~50 units) are not included in this analysis that are analyzed earlier in this section.

Affordability Levels of Zero- and One-Bedroom Apartments by Square Footage

In addition to examining rents by number of bedrooms, it is also useful to look at rents by unit size based on square footage. The square footage of apartments dramatically impacts their market rents, with the smallest zero- and one-bedroom apartments having higher per square foot rents but lower unit rents overall compared to their larger counterparts.

Figure A-91 shows CoStar data for 0-bedroom and 1-bedroom apartments, categorized based on their square footage and the age of the property in which the apartments are located. This analysis uses less than 220 square feet to loosely represent the smallest category of units, commonly referred to us "micro-units." Micro-units are typically suitable for one-person households. Some micro-units offer vertical space such as platforms with loft beds; such units are most appropriate for people able to climb ladders or stairs.

The analysis also includes a category for 220 to 400 square feet; and a category over 400 square feet to represent larger zero- and one-bedroom units.

There is nearly a $1,000 difference in the median rent between micro-units with less than 220 square feet of net rentable floor area and 0-bedroom or 1-bedroom apartments over 400 square feet. The difference is about $1,100 when looking at units in buildings less than 10 years old.

Calculating *specific* income levels required for these units to be affordable to households allows for greater insights. Regardless of the property age category, the median gross rent for units with less than 220 square feet is affordable to households with specific incomes between 37 and 45% of AMI, and the median gross rent for units with 220 to 440 square feet is affordable to households with specific incomes between 53 and 60% of AMI. In comparison, the median gross rent of new apartments over 400 square feet is only affordable to households at or above 86% of AMI while the median gross rent for apartments of the same size over 30 years old is affordable to households with incomes 60% of AMI or higher. Regardless of square footage, median gross rent required to afford units in this analysis is lower with age; however, the difference between newer apartments less than 10 years old and older apartments over 30 years old is greatest in apartments with more than 400 square feet.

Figure A-90
Median rents by Square Footage, for 0-Bedroom and 1-Bedroom Apartments

	Median Gross Rent (February 2023)			Number of Units in CoStar Sample		
Apartment Square Footage	All Units	Less than 10 Years Old	Over 30 Years Old	All Units	Less than 10 Years Old	Over 30 Years Old
Less than 220 SF	$1,025	$1,058	$883	2,351	1,839	200
220 to 400 SF	$1,362	$1,416	$1,247	9,821	6,012	3,013
Over 400 SF	$1,988	$2,182	$1,514	76,377	38,973	21,871
	Household Income (Percentage of AMI) Needed to Afford Median Gross Apartment Rent					
Apartment Square Footage	All Units	Less than 10 Years Old	Over 30 Years Old			
Less than 220 SF	44% of AMI	45% of AMI	37% of AMI			
220 to 400 SF	58% of AMI	60% of AMI	53% of AMI			
Over 400 SF	79% of AMI	86% of AMI	60% of AMI			

Sources: CoStar Group, www.costar.com; ACS 5-Year PUMS 2017-2021 prepared by City of Seattle OPCD

Notes: Median gross apartment rents are calculated using CoStar Effective Rents for apartments described in Footnote 92 and PUMS estimates of tenant-paid utilities by the number of bedrooms. See Footnote 93 for information about how HAMFI is used to calculate 2022 Maximum Affordable Gross Rents and compare to specific AMI levels.

For this analysis, which includes CoStar identified 0-bedrooms and 1-bedrooms, we assume 1 person for apartments in the Less than 220 SF and 220 to 400 SF categories, and 1.5 person households for apartments in the Over 400 SF category. These assumptions may result in an overestimate of affordability for 1-person households and an underestimate of affordability for 2-person households.

Context on Housing Affordability with Recent Increases in AMI

The analysis presented in the prior section on the affordability of apartment rents measures the household income, expressed as a percentage of AMI, that a household would need if they were spending no more than 30 percent of their income on monthly housing costs. Estimated affordability levels are very sensitive to changes in AMI. During times when area median income is increasing rapidly, as it has been in recent years, affordability levels expressed as a percentage of AMI can paint an overly positive picture for the most economically vulnerable households unless those households' incomes increase as rapidly as AMI.

HUD's calculation of AMI starts with area median family income from the ACS for the most recent year for which data are available and then factors in inflation to arrive at AMI for the current year. Given increases in the median family income estimates from the ACS and the inflation rate adjustments applied to these estimates, the HUD-calculated AMI for the Seattle-Bellevue metro area (King and Snohomish counties combined) increased by 16 percent in a single year (2021 to 2022). This was followed by an additional 9 percent increase between 2022 and 2023.

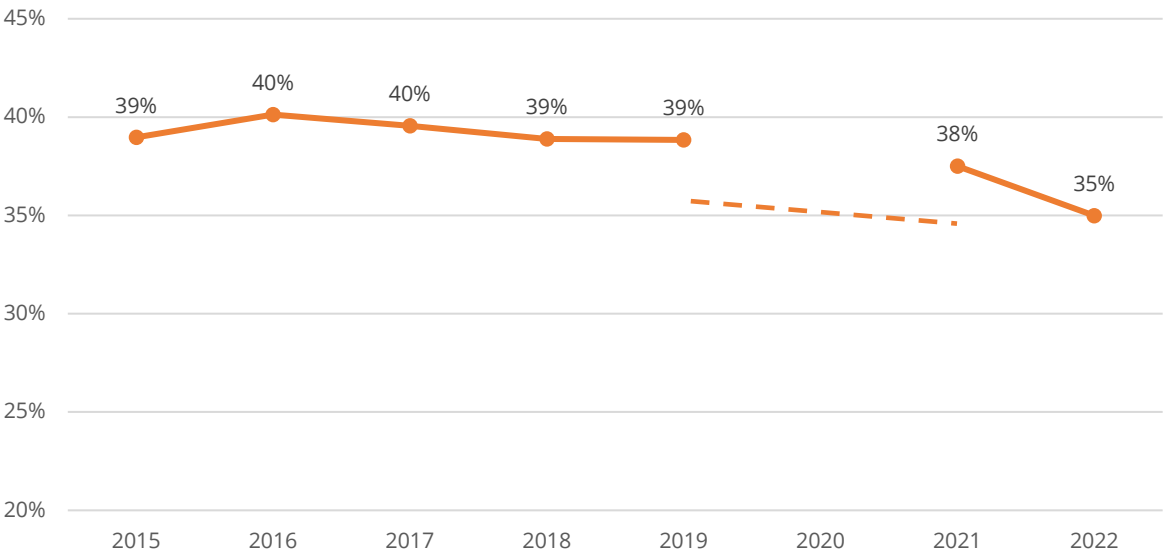
Recent ACS estimates presented in Figure A-92 provide an indication that household incomes near the low-end of the spectrum have not risen as fast as AMI in the Seattle area. Looking at 2022 ACS data (the most recent available at the time of our analysis) finds that in the Seattle-Bellevue metro area, income at the 20th percentile of the overall household income distribution was only 35 percent of HUD's published AMI for Fiscal Year 2022; this compares to 38 percent for 2021 and 39 to 40 percent for 2015 to 2019. [94]

It is also useful to keep in mind that inflation impacts are greatest for households on the lowest rungs of the economic ladder. Low-income households have fewer options for reducing expenditures on basic needs like housing, healthcare, and food. Rising housing costs reduce their ability to afford other necessities, for which costs have also risen dramatically in recent years. [95]

[94] In the city of Seattle, the 20th percentile household income, while lower, followed a similar trend. The 20th percentile household income estimates used in this analysis are based on the upper limit of the lowest household income quintile in ACS Table B19080 "Household Income Quintile Upper Limits" for selected years. The analysis is intended to provide a general sense of how HUD AMI has been trending relative to household incomes in the lowest portion of the overall household income distribution; there are nuances that this simple analysis does not take into account.

[95] See "High inflation disproportionately hurts low-income households" Aparna Jayashankar and Anthony Murphy, Federal Reserve Bank of Dallas, January 10, 2023. And "United States Inflation Experience across the Income Distribution" Joshua Klick, Anya Stockburger" Working Draft Prepared for the Group of Experts on Consumer Price Indices UNECE Geneva, June 2023.

Figure A-91
20th Percentile Household Income as a Percentage of HUD AMI, Seattle-Bellevue Metro Area



Sources and notes: HUD AMI refers to HUD Fiscal Year Area Median Family Income for the Seattle-Bellevue, WA HUD Metro FMR Area (i.e., King and Snohomish counties combined) accessed from https://www.huduser.gov income limits data portal. The 20th percentile household income estimates are 1-year estimates from the Census Bureau's ACS Table B19080. 2020 1-year estimates are not available from the ACS due to disruptions to data collection disruptions

Median Apartment Rents by Number of Units in Property

This section looks at median gross rents by the size and age of properties.[96] In general, apartments less than 10 years old in Seattle tend to be in properties with 50 or more units, while apartments older than 30 years are more commonly in smaller properties. The relationship among property size, age, and price is also intertwined with the quality, type and safety of building materials used in development, the level of amenities (of which there are typically fewer in smaller buildings), the price of land and financing, and neighborhood characteristics.

Figure A-93 shows that units in older properties of all sizes have lower median rents than the overall medians in the corresponding size categories, whereas units in buildings under 10 years old are more expensive. Furthermore, having fewer units in a building is correlated with lower gross rents across all building ages.

[96] CoStar reports multifamily housing at the property level, which may include more than one building, whereas the Assessor's analysis reports multifamily housing at the building level.

Figure A-92
Median rents by Number of Units in Building

	Median Gross Rent (February 2023)			Number of Units in Sample		
Number of Units in Building	All Units	Less than 10 Years Old	Over 30 Years Old	All Units	Less than 10 Years Old	Over 30 Years Old
5 to 19 Units	$1,391	$1,787	$1,370	8,739	389	7,901
20 to 49 Units	$1,647	$1,759	$1,580	20,305	4,706	12,794
50+ Units	$2,243	$2,362	$1,828	85,566	52,420	13,764
All buildings with 5 or more units	$2,087	$2,321	$1,629	114,610	57,515	34,459

Sources: CoStar Group, www.costar.com; ACS 5-Year PUMS 2017–2021 prepared by City of Seattle OPCD

Notes: Median gross apartment rents are calculated using CoStar Effective Rents for apartments described in Footnote 92 and PUMS estimates of tenant-paid utilities by the number of bedrooms

Affordability of Apartment Rents by Worker Occupation

Another way to understand the implications of Seattle's rental housing market is to look at whether people in various occupations can afford the rents being charged. The analysis presented in Figure A-94 gauges whether a Seattle apartment unit with the average rent for its size is affordable for a household where the worker(s) in the household earn the average pay in Seattle for their occupation(s). We consider a unit affordable if rent consumes no more than 30 percent of wages.[97, 98]

Cells with green checks indicate the average rent for an apartment of the specified size would be affordable to the example households described in each row, while the red "x"s indicate the rent would not be affordable to the households with the specified workers.

[97] This is a simplified analysis in that it does not account for the cost of utilities nor for sources of income besides wages.

[98] For this analysis, we used with average wage statistics for May 2022 for the Seattle-Tacoma-Bellevue MSA from the federal Bureau of Labor Statistics (BLS), adjusting for higher wages paid in the city for many occupations. ACS data (1-year 2022 estimates) indicate that wages in most occupational groups are somewhat higher in the city of Seattle than in the metro area. For occupations in these groups, we estimated average wages paid in Seattle for the occupation by multiplying the metro area earnings from the BLS statistics by the ACS-derived ratio of Seattle median earnings to metro area median earnings for the applicable occupational group. We used the BLS statistics without adjustment for other occupations. Part-time workers in our analysis were assumed to earn half the annual average for a full-time worker in their occupation.

For rents, we used second quarter 2022 average effective rent estimates for apartments in Seattle from CoStar. The apartments in the CoStar multifamily database are limited to units in complexes with 5 or more units. For this analysis we excluded units in properties where all units are income- and rent-restricted. We additionally excluded cooperatives, dormitories, student housing, congregate housing, condominiums, corporate housing, and military housing.

The first rows in the table illustrate affordability for households with a sole wage earner who is in a full-time position in the occupation shown.

- In households with just one wage earner, the worker would need to be employed full time in an occupation earning roughly $58,500 (roughly 1.6 times the minimum wage that large employers in Seattle must pay workers) to afford rent for a zero-bedroom unit of average cost. Full-time workers earning the minimum wage would be cost-burdened renting an average cost zero-bedroom unit. Childcare workers, groundskeepers, wait persons, and medical assistants earning the average for their occupations are also among those who would be unable to afford the average zero-bedroom apartment.
- The situation is somewhat better for construction workers, bus drivers, administrative assistants, and social workers; they can afford a zero-bedroom apartment, but not a one-bedroom apartment.
- Full-time workers in better-paying professional fields can afford a one-bedroom apartment without another wage earner in the home.
- Of all the occupations selected for analysis, registered nurses and software developers are the only ones able to afford an average-cost two-bedroom apartment as a sole wage earner. Of these, only software developers can afford three bedrooms.

The second part of Figure A-94 shows examples of households with two wage earners.

- Part-time workers in low-paying occupations struggle to afford housing costs even when sharing rent. For example, a part-time waitperson and a part-time bank teller would together be unable to afford even the average zero-bedroom apartment unit.
- Two-earner households in which at least one person works full time generally fare better. Still, some households with dual earners in low-paying occupations are unable to afford a one-bedroom apartment.

Of course, not all household members are wage earners; households may include dependents, and multiple bedrooms are needed for many of these households. Seattle's housing market is often more challenging for these households given that affording the average rent for a two-bedroom apartment requires earnings of at least $108,000 per year. Households need two wage earners in at least a moderately well-paid occupation or one worker in a well-paid profession to afford an average-cost two-bedroom apartment.

Figure A-93
Affordability of Seattle Apartment Rents by Occupation of Wage Earners, 2022

Number of Wage Earners and People in Household	Occupation(s)	Estimated Average Annual Wage Paid in Seattle	Estimated Maximum Afford-able Gross Rent	Affordability of Rent by Unit Configuration			
				0-BR Ave. rent $1,463 ($58,520 per year to afford)	1-BR Ave. rent $2,006 ($80,240 per year to afford	2-BR Ave. rent $2,701 ($108,040 per year to afford	3+BR Ave. rent $3,882 ($155,261 per year to afford)
1 full-time wage earner in household with 1 or more persons	Minimum-Wage Worker (w/large employer)	$35,922	$898	✗	✗	✗	✗
	Childcare Worker	$41,551	$1,039	✗	✗	✗	✗
	Assembly Worker	$46,430	$1,161	✗	✗	✗	✗
	Groundskeeper	$48,920	$1,223	✗	✗	✗	✗
	Bank Teller	$51,155	$1,279	✗	✗	✗	✗
	Waitperson	$51,796	$1,295	✗	✗	✗	✗
	Hairdresser	$52,511	$1,313	✗	✗	✗	✗
	Medical Assistant	$56,895	$1,422	✗	✗	✗	✗
	Construction Worker	$59,676	$1,492	✓	✗	✗	✗
	Administrative Assistant	$59,686	$1,492	✓	✗	✗	✗
	Bus Driver	$68,910	$1,723	✓	✗	✗	✗
	Child or Family Social Worker	$74,122	$1,853	✓	✗	✗	✗
	Firefighter	$84,270	$2,107	✓	✓	✗	✗
	Teacher (Elementary School)	$92,296	$2,307	✓	✓	✗	✗
	Electrician	$92,521	$2,313	✓	✓	✗	✗
	Community Service Manager	$107,871	$2,697	✓	✓	✗	✗
	Registered Nurse	$109,506	$2,738	✓	✓	✓	✗
	Software Developer	$165,294	$4,132	✓	✓	✓	✓
2 wage earners—full-time (FT) or part-time (PT) in household with 2 or more persons	Waitperson (PT) and Bank Teller (PT)	$51,475	$1,287	✗	✗	✗	✗
	Childcare Worker (full-time) and Hairdresser (part-time)	$67,806	$1,695	✓	✗	✗	✗
	Two minimum-wage workers (both full-time)	$71,843	$1,796	✓	✗	✗	✗
	Assembly Worker (FT) and Medical Assistant (PT)	$74,878	$1,872	✓	✗	✗	✗
	Admin Assistant (FT) and Hairdresser (PT)	$85,934	$2,148	✓	✓	✗	✗
	Construction Wkr (FT) and Community Srvc Mgr (PT)	$113,611	$2,840	✓	✓	✓	✗
	Bus Driver (FT) and Firefighter (FT)	$153,180	$3,830	✓	✓	✓	✗
	Registered Nurse (FT) and Electrician (FT)	$202,027	$5,051	✓	✓	✓	✓

Sources: Bureau of Labor Statistics (BLS), Occupational Employment and Wage Statistics (OEWS), www.bls.gov/oes/; American Community Survey; CoStar Group, www.costar.com. See Footnotes 92 and 93 for details on sources and analysis methodology.

The Role of ADUs in Meeting Housing Needs

Accessory dwelling units (ADUs) are small, secondary living units allowed in residential areas. They go by many names — backyard cottage, carriage house, accessory apartment, in-law unit — and offer many benefits to their owners and occupants. ADUs were common in cities like Seattle in the first half of the 20th century but fell out of favor after World War II with the rise of detached homes and expansion of single-family-only zoning.

Seattle relegalized these traditional dwellings in our Neighborhood Residential zones starting with attached ADUs (AADUs) in 1994, as required following passage of the Washington Housing Policy Act, and continuing with detached ADUs (DADUs), first in 2007 as a pilot in southeast Seattle and then citywide in 2010. Despite their many benefits for owners and occupants, including rental income, flexible space to meet changing family needs, and a lower-cost alternative to large, detached homes, relatively few ADUs were permitted following the 2010 legislation.

Since then, Seattle has taken steps to encourage production of ADUs as part of our broader work to increase housing opportunities and address neighborhood exclusion. In 2019, Seattle reformed its rules for ADUs and removed several regulatory barriers that historically discouraged or prevented property owners from creating this type of housing.

Under Seattle's updated ADU regulations:

- Two ADUs are allowed on all lots in Neighborhood Residential zones. They can be configured as two AADUs or, depending on lot size, one AADU and one DADU. (House Bill 1337, adopted in 2023, requires cities in Washington to allow two DADUs in either one or two separate structures in all residential zones.)
- No off-street parking is required when an ADU is added.
- The ADUs and the principal dwelling unit can each be rented by different tenants, owned by a single property owner, owned as condominium units, or a mix of these forms of tenure. Seattle does not have an owner-occupancy requirement.
- New ADUs have a maximum size limit of 1,000 square feet, excluding garage and storage space. ADUs in a converted living space or accessory structure can exceed this size limit.
- DADUs have a maximum allowed height of 23 or 25 feet tall on most sites, allowing for a second story of living space.
- On sites with an alley, a DADU can be located at the lot line that abuts the alley.
- ADUs are not subject to subjective or discretionary design requirements.

In addition to regulatory reforms, Seattle implemented other programmatic strategies to address ADU barriers. In 2020, OPCD launched ADUniverse, a one-stop online portal for ADU guidance and resources, including a property search tool that offers site-specific information about ADU feasibility and a gallery of pre-approved DADU designs that offer a faster and more predictable permitting process for residents.

Due in part to these efforts, ADU production in Seattle has increased substantially over the last several years. OPCD's 2022 ADU Annual Report[99] provides data and findings related to ADU production and outcomes in Seattle, with highlights summarized below. In 2022, the City issued permits for nearly 1,000 ADUs; this was more than four times the number of units permitted in 2018, the last full year before ADU reforms took effect. Permits were issued for 437 AADUs and 551 DADUs, primarily in Seattle's NR zones. About 40 percent of these permits included multiple units (either an AADU and DADU or two AADUs), and one-third of ADUs were permitted along with a new detached home, likely as part of a full redevelopment of a site in an NR zone that previously had only a single detached home. More than 70 percent of new detached homes permitted in Seattle in 2022 included an ADU, likely a reflection of the floor area ratio (FAR) limit established through the 2019 ADU reforms, which limited the size of new detached homes and exempts floor area in an ADU as an incentive to include those units in new developments.

ADUs in Seattle are used in various ways:

- Seattle's survey of ADU owners and occupants, analyzed in the 2022 ADU report, suggests the average monthly rent charged for ADUs that are rented to tenants is substantially less than a typical multifamily apartment. Most respondents to our 2022 survey of ADU owners and occupants reported monthly rents between $1,250 and $2,000, with an overall median of $1,650. About 80 percent reported rents below the Seattle median one-bedroom apartment rent, and a portion of respondents reported rents under $1,000.

- Some ADUs are offered as short-term rentals (STRs) on platforms like Airbnb and Vrbo. Seattle has regulations that limit the number of units an operator can offer for short-term rental. Data from the City's STR licensing system suggests that about 12 percent of ADUs in Seattle are associated with an active STR license.

- Through City permitting and County recording data, we can identify the share of ADUs created and sold as condominium units, which appears to be a rising trend. Very few ADUs were created as condos before 2018, but this became much more common starting in 2020. In 2021, roughly one-third of ADUs permitted were part of a condo. A review of a sample of condo sales in 2022 shown in the Ownership Market section of this Housing Appendix suggests that ADUs sold as condos typically offer a lower price point for new construction than otherwise available in NR zones.

The survey of ADU owners and occupants also found a median cost of $100,000 to develop AADUs and $230,000 to develop DADUs. The median cost to build two ADUs was $200,000 per ADU. Survey respondents used a mix of cash and debt (home equity line of credit, mortgage refinancing, credit cards, etc.) to finance their ADU construction.

[99] Accessory Dwelling Units 2022 Annual Report, City of Seattle OPCD, March 2023. Readers can access the report as well as other resources on OPCD's webpages related to our work Encouraging Backyard Cottages.

Together, these findings offer some potential conclusions about the role of ADUs in meeting Seattle's housing needs. First, ADU production has increased in recent years, due at least partly to the 2019 regulatory reform, and consequently ADUs are the primary form of net housing unit growth in Seattle's NR zones. Second, high demand for ownership housing in these neighborhoods is driving a rise in ADUs offered as condominiums, suggesting that additional reforms to increase the potential for similar middle housing options would help meet the need for lower-cost homeownership options. Third, survey responses suggest ADUs provide myriad benefits for their owners — including the ability to house family members, adapt to changing household needs, and afford the costs of homeownership — but their high cost generally restrict these benefits to homeowners who have high incomes and wealth and who are disproportionately white.

Housing Condition

Substandard and otherwise poor housing conditions harm health and pose safety hazards. Living in such housing can exacerbate chronic diseases and heighten risks of infection and injury. Having substandard housing is also correlated with poor mental health.[100] Overcrowding of occupants within housing units, which is one of the topics covered in the earlier discussion of housing problems that households face, is connected to similar harms. The importance of housing conditions for health has recently been highlighted by research showing elevated COVID-19 case rates and deaths among households in housing with a lack of complete kitchen facilities, complete plumbing facilities, and/or overcrowding.[101]

Low-income renters, households of color, and other marginalized populations tend to experience the greatest exposure to and risks of substandard housing conditions. The youngest and oldest members of a community are particularly vulnerable as are those with a health condition or disability.

UNITS LACKING COMPLETE KITCHEN AND PLUMBING FACILITIES

The proportions of households in units lacking complete kitchen facilities and complete plumbing facilities are generally small in the U.S. and Seattle, although the shares tend to be somewhat higher for renters than for owners.

[100] Housing and Health: Time Again for Public Health Action, https://www.ncbi.nlm.nih.gov/pmc/articles/PMC1447157/

[101] Zachary Parolin, Emma K. Lee, "The Role of Poverty and Racial Discrimination in Exacerbating the Health Consequences of COVID-19," The Lancet Regional Health - Americas, Volume 7, 2022,

- About 1.8 percent of occupied housing units lack complete kitchen facilities, with lower rates for owner-occupied units (0.4%) than for renter occupied units (2.9%).[102]
- About 0.4 percent of occupied housing units lack complete plumbing facilities, again with lower rates for owner-occupied units (0.2%) than for renter occupied units (0.6%).

RISK OF EXPOSURE TO LEAD PAINT

The state Department of Health uses data on housing units built before 1980 as a general indicator of potential risk of exposure to lead paint. When lead paint is present, risks are typically greatest for households with young children or pregnant persons, and when paint is being disturbed such as during renovations. An estimated 54 percent of housing units in the city were built prior to 1980.[103] Mapping shows that the prevalence of housing this old is higher in most neighborhoods in Seattle and communities just to the north and south of Seattle than in more suburban communities in King County.[104]

UNSAFE HOUSING CONDITIONS FOUND BY RENTAL HOUSING INSPECTIONS

Seattle's Rental Registration and Inspection Ordinance (RRIO) program provides additional insights into unsafe housing conditions. The RRIO Annual Report for 2022[105] indicates that the most common reasons that City inspectors found that year for units failing initial inspections that year included unsafe electrical equipment and exposed wiring, missing or nonfunctional smoke alarms, and issues with railing.

EXPERIENCES OF TENANTS

Questions about housing condition were part of a non-random online survey that the organization Washington CAN! conducted about the challenges experienced by renters in Seattle.[106] Mold was by far the most common problem that respondents identified with the physical condition of their unit. Other problems identified include problems with pests, exposed wiring, broken thermostats, broken windows, and broken locks.

The Washington CAN! survey additionally asked respondents to indicate barriers to securing needed repairs and barriers, if any, that would keep them from moving. Nearly nine in ten indicated that the

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[102] The lack of a complete kitchen does not always signal a problem, Per the ACS, roughly one in three Seattle renter households whose units lack complete kitchens have their meals included in their rent. Another consideration is that tenants in some units, such as the microunits built in substantial numbers in Seattle in the early 2010s, may lack a complete kitchen within their individual space, but share a full kitchen with others in a building. (The ACS data is not detailed enough to tell us how tenants in microunits answered the question about kitchen facilities.)

[103] Based on 2021 1-year ACS estimates.

[104] Washington State Department of Health, Lead Risk from Housing | Washington Tracking Network (WTN), 2015-2019 5-year ACS estimates.

[105] Seattle Department of Construction and Inspections "Rental Registration and Inspection Ordinance (RRIO) 2022 Annual Report to the City Council," March 2023.

[106] Seattle's Renting Crisis: Report & Policy Recommendations Washington CAN!, July 2016.

up-front costs associated with moving into a different unit would be a barrier; concerns about discrimination by potential landlords was also a common response. Also common were worries that a landlord may retaliate if asked to repair a problem.

The King County Board of Health's "Healthy Housing" report echoes many of these themes and highlights that households with lower incomes confront tradeoffs between housing condition and affordability. The authors also explain that part of why renters are at higher risk than owners of living in deficient housing is due to the lower level of control they have regarding the housing in which they live.[107]

OTHER HAZARDS

Other hazardous housing conditions do not present day-to-day danger, but place people at great risk when earthquakes and other disasters happen. Earthquakes present the greatest risks of severe damage. [108] At greatest risk of severe damage and collapse during earthquakes are unreinforced masonry (URM) structures; typically, these are brick buildings built prior to 1945.

According to a report associated with the City's recently updated URM inventory,[109] there are 362 URM buildings with residential occupancy, 47 of which contain income-restricted affordable housing units. The same report notes anecdotal information that many non-income restricted URM buildings also provide relatively affordable units and commonly house low-income and immigrant tenants.

[107] The King County Board of Health Guideline and Recommendation on Healthy Housing was produced in 2018 to inform regional and local implementation of earlier updates of the King County Countywide Planning Policies on housing.

[108] Seattle City Office of Emergency Management, Seattle Hazard Identification and Vulnerability Analysis.

[109] The List of URMs Identified by the City in 2023 and the associated Report To Policy Committee On URM List Validation and ConfirmedURMList.pdf (seattle.gov) can be found with other information on URM's the Seattle Department of Construction and Inspects webpage at Unreinforced Masonry Buildings - Project Documents - SDCI | seattle.gov.

The Role of Housing Vouchers in Seattle's Rental Market

The Seattle Housing Authority (SHA) administers 10 voucher programs financed through federal and state resources. Rental vouchers are critical in opening opportunities to housing across the city while ensuring that households with vouchers pay limited rental costs.

These voucher programs aim to ensure that income qualified tenants pay no more than 30 to 40 percent of their household income on housing, with some exceptions explained later in this section. These programs do so by providing a subsidy for voucher holders for rent costs that exceed 30 to 40 percent of household income, which are paid by SHA.

Figure A-95 shows that, as of 2023, SHA administers 13,117 vouchers to local households. The Moving To Work (MTW) program has the largest number of vouchers, with 10,406 vouchers locally. The MTW program serves families from waiting lists based on SHA or project-based local priorities; serving households with incomes at or below 30% of AMI is one of those priorities. Each of the other 9 voucher programs are targeted to serve a specific population or housing development need, such as how Veterans Affairs Supportive Housing (VASH) serves veterans.

To qualify for a voucher, households must have household incomes at or below 50% of AMI.[110] However, unlike Medicaid, Medicare, Social Security, or the Supplemental Nutritional Assistance Program (SNAP), housing vouchers are not an entitlement program. This means there are very limited vouchers compared to the number of households that may qualify for them. Given the 2019 baseline of approximately 45,000 households in Seattle with incomes at or below 50% of AMI, there were vouchers for less than a third of households who would otherwise meet the income qualifications for voucher programs.

Utilization rates, or the percentage of vouchers currently in use, further presented in Figure A-95 show the degree to which local households are able to use the vouchers assigned to Seattle. Variances in utilization rates are dependent on the quality of housing, the ability to move income-qualified individuals into units, and a variety of market-related factors, such as cost, location, and discrimination, that may otherwise exclude households from housing. Timing is also highly important. SHA recently received more VASH vouchers, many of which are yet to be utilized, which had driven the utilization rate down.

[110] For further eligibility information, visit Seattle Housing Authority's Housing Choice Voucher Eligibility webpage

Figure A-94
Vouchers by Program (June 2023)

Program Names	Number of Vouchers			Utilization Rate (as of June 2023)	
	Project-based Vouchers	Tenant-based Vouchers	Total Vouchers	Project-Based Vouchers	Tenant-Based Vouchers
Moving to Work (MTW)	4,389	6,017	10,406	91%	88%
Tenant Protection Vouchers (TPV)	-	147	147	-	78%
Rental Assistance Demonstration (RAD)	396	-	396	94%	-
Emergency Housing Voucher (EHV)	-	518	518	-	114%
Veterans Affairs Supportive Housing (VASH)	169	500	669	91%	69%
Mainstream	89	216	305	91%	74%
Family Unification Program	-	210	210	-	87%
Family Unification Program Youth (FUPY)	-	65	65	-	92%
Foster Youth to Independence (FYI)	-	163	163	-	15%
Moderate Rehabilitation:	238	-	238	69%	-
Total:	5,281	7,836	13,117		

Source: Seattle Housing Authority as of June 2023

Note: Program descriptions and waitlists for vouchers are further available on Seattle Housing Authority's Housing Choice Voucher webpage, and linked Special Purpose Voucher Program webpages.

As shown in Figure A-95, vouchers can be either project-based – meaning tied to a specific unit in a housing development – or tenant-based – meaning they are given to a household so that they may find housing in the local market. As the total number of vouchers is limited by the financing given to programs by Congress, every project-based voucher issued results in one less that is tenant-based.

Project-based vouchers are tied to income-restricted housing developments throughout the city. SHA works with developers or, more commonly, Seattle's Office of Housing (OH), to determine which developments receive project-based vouchers. This is beneficial for both tenants and the income-restricted housing developers, as the presence of project-based vouchers can help income-restricted developments receive development financing.

Tenant-based vouchers give households the opportunity to choose where to rent. Households have opportunities to reside in diverse forms of housing, as well as neighborhoods where there may otherwise be no subsidized rental housing, but where there are amenities such as job access, schools, transit, or public space that fit household needs.

In allowing tenants to seek their own housing in the market, tenant-based vouchers have a maximum subsidy, called a payment standard, paid on behalf of a voucher holder. Payment standards are determined by annual market studies conducted by SHA, which considers vacancy rates, leasing success rates, and other metrics when developed. In general, payment standards are

roughly an estimate of the 40th percentile rents for units within the Seattle-Bellevue HUD Fair Market Rent (FMR) Metro Area.

Furthermore, voucher payment standards vary by the type of rental unit—market-rate or affordable. Market-rate units are those which have no income-restrictive covenants, whereas affordable units are those which do, such as those financed through OH.[111] Based on a 2023 survey of landlords who work with SHA, approximately half of tenant-based voucher holders live in housing that is otherwise income-restricted, and half live in housing that is not income-restricted.

Figure A-96 below describes the number of vouchers by project-based and tenant-based, as well as the tenant-based voucher payment standards. Vouchers and payment standards are broken down by the size of the units, so that households may better afford to rent units that are right sized for their household needs.

Seventy-two percent of project-based vouchers are for 0-bedroom units, whereas tenant-based vouchers are spread more evenly across unit configurations but are mostly for units with 2 or fewer bedrooms. The concentration of project-based vouchers can be a function of the populations these developments serve, such as through permanent supportive housing.

Tenant-based voucher holders can often have long searches to find appropriate housing, in part due to a limited supply that meets the payment standard budget. Tenants do have the option to exceed this payment standard budget; however, they will not receive additional subsidy, and families entering an initial lease with a Housing Choice Voucher must not pay more than 40 percent of their income toward rent costs. Tenants can exceed this rate after their initial lease.

[111] This is true with one exception - SHA considers Multifamily Tax Exemption Units to be market-rate.

Figure A-95
SHA Voucher Payment Standard as of October 2022

Minimum Persons in Household	Maximum Persons in Household	Number of Bedrooms	Number of Vouchers at SHA		Tenant-Based Voucher Payment Standard	
			Project-Based	Tenant-Based	Market-Rate	Affordable
1	1	0	3,468	1,432	$1,747	$1,358
1	2	1	534	1,757	$1,816	$1,455
2	4	2	575	1,794	$2,134	$1,747
3	6	3	235	956	$2,917	$2,018
5	8	4	32	217	$3,430	$2,251
7	10	5	2	42	$3,945	$2,484
Higher than 7	Higher than 10	6 or Higher	0	12	$4,458	$2,769

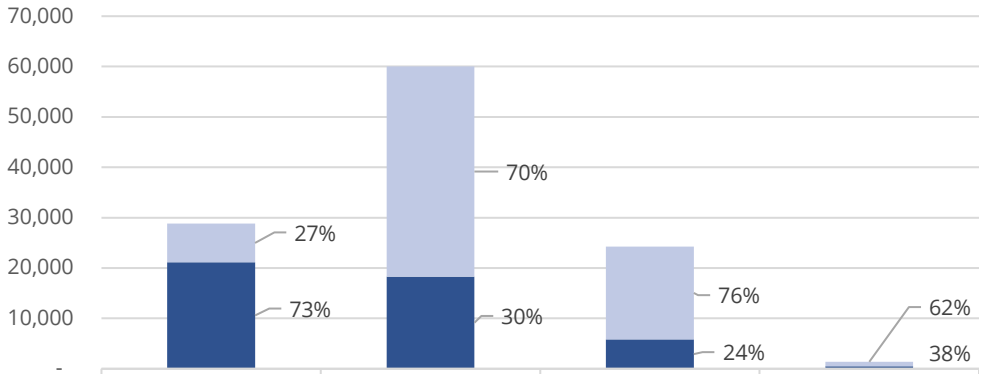
Source: SHA Voucher Payment Standards as of October 2022

Note: Voucher standards only apply to tenant-based vouchers; Project-based voucher rents and therefore maximum subsidies are negotiated directly with income-restricted housing operators.

Figure A-97 breaks down apartment rents in Seattle based on whether they are at or below payment standards by their size. The sample is limited and does not include income-restricted housing, and therefore uses the market-rate voucher payment standard in Figure A-96 as a benchmark. The share of Seattle apartments that are at or below the payment standard is limited, especially in the 1-bedroom and 2-bedroom sizes. The overall number of 3-bedroom units below the payment standard is much lower than all other unit configurations. In addition, households are ultimately not required to rent a unit that is the exact number of bedrooms as their voucher is worth; they may rent a smaller unit if that is the only one available.

We can further look at the vouchers currently in utilization by building type. Figure A-98 shows a sample of 9,688 vouchers in utilization for which we have building type data. A combined 23 percent of voucher utilizations are in detached homes, small multiplexes such as duplexes, and rowhouses or townhouses. Of 2,184 vouchers in these building forms, 1,584, or approximately three-quarters of these vouchers, are tenant-based. This sizable portion demonstrates how tenant-based vouchers increase the variety of building forms, and therefore also neighborhoods, accessible to voucher holders. The remaining 77 percent of vouchers utilized are in multifamily buildings, with nearly all being used in multifamily buildings with 3 stories or more.

Figure A-96
Share of Apartments with Rents at or Below Payment Standards



	0-Bedroom	1-Bedroom	2-Bedroom	3-Bedroom
Over Payment Standard	7,645	41,745	18,456	863
At or Below Payment Standard	21,161	18,287	5,825	520

Sources: SHA; CoStar Group, www.costar.com; ACS 5-Year PUMS 2017-2021 prepared by City of Seattle OPCD

Notes: Median gross apartment rents are calculated using CoStar Effective Rents for apartments described in Footnote 92 and PUMS estimates of tenant-paid utilities by the number of bedrooms.

Figure A-97
Voucher Utilizations by Building Type

Building Type	Project-Based Vouchers	Tenant-Based Vouchers	**Total**
Detached Home	128	508	**636 (7%)**
Duplex or Triplex	103	317	**420 (4%)**
Fourplex, Townhouse, and 1 & 2 story multifamily	369	759	**1,128 (12%)**
Multifamily, 3 or more stories	4,246	3,258	**7,504 (77%)**
Total	**4,846 (50%)**	**4,842 (50%)**	**9,688 (100%)**
Source: Seattle Housing Authority as of June 2023			

Affordability of Housing: Analysis Based on CHAS Data

This section uses 2015-2019 5-year CHAS data from the same period to analyze the affordability of Seattle's housing supply. With this analysis, we are examining the affordability of Seattle's housing supply independent of the households who currently live in the housing units.

Affordability of each housing unit is categorized based on the income level that a hypothetical household would need to afford the monthly housing costs associated with the unit, assuming the household spends no more than 30 percent of its monthly income on housing costs. The fact that suitable unit configurations vary by household size is accounted for by assuming one person for a zero-bedroom unit and 1.5 persons per bedroom for units with one or more bedrooms.[112]

The estimates from the CHAS data on the affordability of Seattle's housing supply refer to affordability in a broad sense; units tabulated as affordable to households at specified income levels may include market-rate as well as units that are income- and cost-restricted.

Affordability of Ownership Units

To represent the monthly costs associated with an ownership housing unit independent of any household currently in the unit, the CHAS tabulations simulate a situation in which a generic household has recently purchased the unit for the home value reported in the ACS and is making payments on an FHA-insured, 30-year mortgage.[113] This analysis provides a useful, but limited picture of ownership housing affordability. One limitation is that the approach does not address whether down payments involved in purchasing a home would be affordable at a given income level.[114] An added caveat for interpreting the findings is that self-reported estimates of home value

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[112] For more information on the CHAS data, see "Measuring Housing Affordability," by Paul Joice, US Department of Housing and Urban Development, *Cityscape: A Journal of Policy Development and Research*, Volume 16, Number 1, 2014.

[113] The ACS asks owners of owner-occupied and vacant, for-sale units to estimate how much the housing unit (and associated lot, if applicable), would sell for. These self-reported amounts are reported in the ACS as home values.

Joice, Paul. *Measuring Housing Affordability*. *Cityscape: A Journal of Policy Development and Research*, *16*(1). 2014. In this publication, Paul Joice of HUD explains that the CHAS tabulations on ownership housing affordability consider a home affordable to a household of a given income level if the home's value is no higher than 3.36 of the household's income. The assumed purchase price is the home value that the respondent provided on the ACS questionnaire. Joice explains that the 3.36 ratio is based on the following terms for FHA-insured mortgages: 31% monthly payment standard, 96.5% loan-to-value ratio, 5.5% interest rate, 1.75% upfront insurance premium, .55% annual insurance premium, and 2% annual taxes and hazard insurance. We have an inquiry into HUD to ask if the assumptions used in modeling ownership housing affordability have changed since the referenced publication was written.

[114] The approach also does not account for how completion of mortgage payments can impact a household's ability to afford the home in which they live nor, for that matter, how the accumulation of equity after purchase can affect a household's wealth.

tend to lag home sales price trends in the market.[115] During the 2015-2019 5-year period reported here, sales prices in Seattle were increasing rapidly.

Figure A-99 summarizes the 2019 5-year CHAS estimates for ownership units in Seattle. The table shows the estimated number of owner-occupied units (disaggregated by whether the units have a mortgage) and vacant for sale units, along with percentages of these units by their AMI-based affordability category.

On a cumulative basis, only 6 percent of ownership units analyzed are affordable at or below 80% of AMI while the share of ownership units affordable at or below 100% of AMI is estimated at 13 percent.

To see how ownership housing affordability varies by neighborhood, see the maps in the Geographic Analysis section of this appendix.

Figure A-98
Affordability of Ownership Units

	Owner-occupied units with a mortgage	Owner-occupied units with no mortgage	Vacant for-sale units	Total ownership units
Ownership units:	108,835	42,165	1,360	152,360
By affordability category:				
Affordable with income of 0–50% of AMI	1.6%	3.0%	7.4%	2.1%
Affordable with income of 50–80% of AMI	3.4%	5.1%	3.3%	3.9%
Affordable with income of 80–100% of AMI	6.7%	6.6%	1.5%	6.6%
Affordable with income above 100% of AMI	88.2%	85.3%	87.9%	87.4%
By affordability level (cumulative):				
Affordable with income at or below 80% of AMI	5.1%	8.1%	10.7%	6.0%
Affordable with income at or below 100% of AMI	11.8%	14.7%	12.1%	12.6%

Source: CHAS tabulations of ACS 2015-2019 5-year estimates, U.S. Census Bureau and HUD.

Notes: As ACS estimates, CHAS tabulations are based on a sample and carry margins of error that can be substantial for small groups of housing units, including for vacant for-sale units in this table. The estimates in this table exclude units that lack complete plumbing and kitchen facilities.

[115] On the Nature of Self-Assessed House Prices, Morris A. Davis and Erwan Quintin, June 2016.

Affordability of Rental Units

Like the preceding estimates for ownership housing affordability, the estimates presented below on rental housing affordability are based on the 2019 5-year CHAS tabulations.

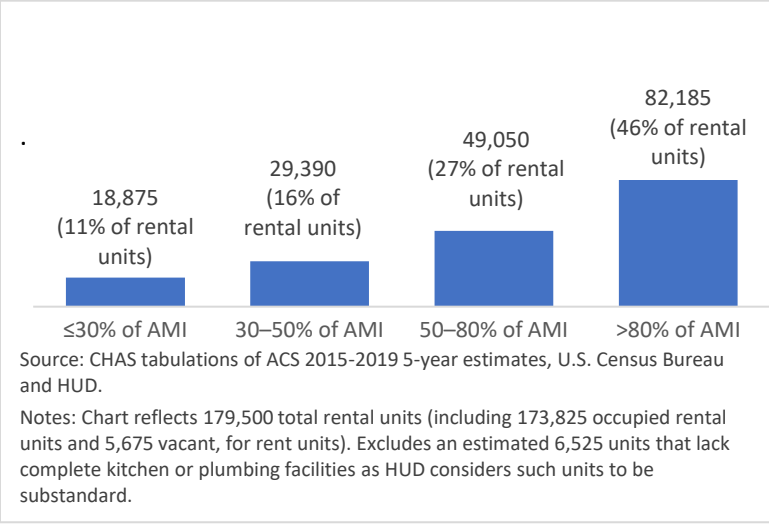
The affordability categories in the CHAS data for rental housing differ somewhat from those for ownership housing; these include more detail in the lowest part of the income spectrum but do not provide detail needed for gauging affordability at 100% of AMI.

Like other data from the ACS, CHAS data do not enable income-restricted units to be distinguished from other housing units. (The ACS does not ask if units are income restricted or if tenants are using housing vouchers.)

Figure A-100 shows the estimated numbers of existing rental units in Seattle that are affordable within different income categories.

- Only 11 percent of Seattle rental units are affordable with an income at or below 30% of AMI.
- About 16 percent are affordable with incomes in the 30–50% of AMI category.
- Another 27 percent are affordable in the 50–80% of AMI category.

Figure A-99
Number and Share of Existing Rental Units by Affordability Category; 2019 5-Year Estimates



Source: CHAS tabulations of ACS 2015-2019 5-year estimates, U.S. Census Bureau and HUD.

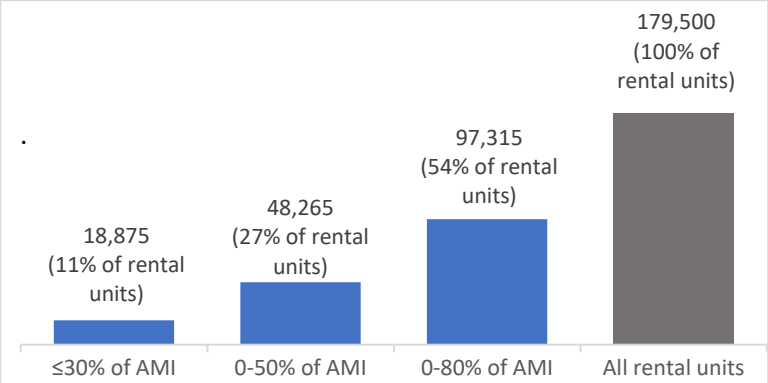
Notes: Chart reflects 179,500 total rental units (including 173,825 occupied rental units and 5,675 vacant, for rent units). Excludes an estimated 6,525 units that lack complete kitchen or plumbing facilities as HUD considers such units to be substandard.

Figure A-101 shows affordability levels on a cumulative basis to provide additional perspective.

- At 50% of the AMI threshold, 27 percent of the rentals in Seattle could be afforded.
- With an income of 80% of AMI, the affordable share doubles—to 54 percent of rental units.

To see how patterns in rental housing affordability vary by neighborhood, see the maps in the Geographic Analysis section.

Figure A-100
Number and Share of Existing Rental Units by Cumulative Affordability Category; 2019 5-Year Estimates



Source: CHAS tabulations of ACS 2015-2019 5-year estimates, U.S. Census Bureau and HUD.

Notes: Chart reflects 179,500 total rental units. See previous figure for additional notes.

TRENDS IN RENTAL AFFORDABILITY COMPARED WITH RENTER HOUSEHOLD INCOMES

We can also examine CHAS data to understand trends in the capacity of Seattle's rental housing supply to meet the needs of households. The analysis below measures change between the 2010 5-year CHAS estimates and the 2019 5-year CHAS estimates.

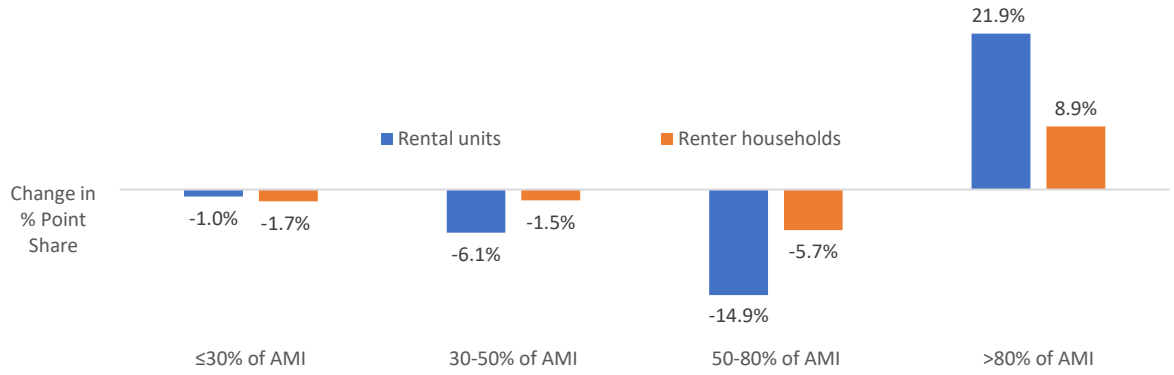
As described earlier in the Housing Appendix, the income profile of Seattle's renter households has been shifting as the number of renter households has increased. To summarize, shares of renter households in low-income categories have decreased, with the 50-80% of AMI band showing a decline in rental households not only in proportional terms but also in sheer number. At the same time, the number and share of renter households with incomes above 120% of AMI have increased.

The affordability profile of rental units in the city has also changed, and this has included a large shift toward units renting for more money than households with incomes at or below 80% of AMI household can afford.

Figure A-102 shows proportional changes in rental housing supply in comparison with proportional changes in household income distribution. Figure A-103 provides additional perspective on these trends by showing the absolute changes in the number of rental units and renter households that accompanied these trends.

A general takeaway from viewing these data is that the rental housing market did an increasingly poor job during this period in providing housing that is affordable to households with incomes at or below 80% of AMI. The share of rentals affordable only with incomes above 80% of AMI increased more than the share of households with income above 80% of AMI, indicating that housing growth in Seattle has done a better job addressing demand from households above 80% of AMI than it has serving households who need units that cost less.

Figure A-101
Changes in Rental Housing Affordability and Income Distribution of Renter Households
2010 5-Year Period and 2019 5-Year Period



Source: CHAS tabulations of 2006-2010 and 2015-2019 ACS 5-year estimates, U.S. Census Bureau and HUD.

Notes: CHAS data do not distinguish between rent/income-restricted housing and market-rate units without such restrictions. Housing unit estimates include renter-occupied and vacant for rent units. Units that lack complete plumbing or kitchen facilities are excluded as HUD considers such units substandard. See prior tables for additional notes.

Figure A-102
Changes in rental Housing Affordability and Income Distribution of Renter Households
2010 5-Year Period to 2019 5-Year Period

	Income Categories			
	≤30% of AMI	30-50% of AMI	50-80% of AMI	>80% of AMI
Change in number of renter households	5,945	2,910	-3,640	31,525
Change in number of rental units in in each affordability category	2,210	-3,155	-12,100	47,630
Change in share of renter households (percentage points)	-1.7%	-1.5%	-5.7%	8.9%
Change in share of rental units in each affordability category	-1.0%	-6.1%	-14.9%	21.9%

Source: CHAS tabulations of ACS 2006-2010 and 2015-2019 5-year estimates, U.S. Census Bureau and HUD.

Notes: Estimates are based on a sample and carry margins of error. See prior tables for additional notes.

Affordability and Availability of Rental Units

The analysis of affordability presented in the preceding sections estimate how much of Seattle's overall rental housing supply is affordable within low-income categories.

For a fuller picture, we need to find out if rental units affordable to households with incomes at or below low-income thresholds are also *available* to renter households with incomes at or below these thresholds. By available we mean that the units are either vacant, or if occupied, the units are not

occupied by households with higher incomes.[116] The "affordability and availability" steps and findings are summarized below. (A table detailing the affordability and availability calculations is provided in the supplemental tables available online.)

To gauge shortages confronting low-income renters, we start by comparing shares of households at or below low-income thresholds with the shares of renter-occupied units affordable to these households. Based on the 2019 5-year CHAS data, which include both market-rate units and rent- and income-restricted units, we find the following.

- Just 11 percent of rental units can be afforded with an income of 30% of AMI. However, 23 percent of renter households have incomes at or below 30% of AMI. (Expressed as a ratio, that is 46 rental units per 100 renter households.)
- About 27 percent of rental units are affordable at 50% of AMI while 36 percent of renter households have incomes at or below 50% of AMI. (As a ratio, this is 73 rental units per 100 renter households.)
- About 54 percent of rental units are affordable at 80% of AMI. In comparison, about 49 percent of renter households have incomes at or below this level. (This equates to 111 rental units per 100 renter households.)

From these comparisons, we can readily see that there are shortages in rentals affordable at 30% of AMI and at 50% of AMI. At the same time, there *appear* to be sufficient units affordable at 80% of AMI.

We now need to adjust for the fact that some rentals affordable at each of these three low-income levels are occupied by households with incomes higher than these respective levels. This adjustment is necessary as market-rate rental units affordable at or below a given income threshold can be—and often are—occupied by households with incomes higher than that threshold.

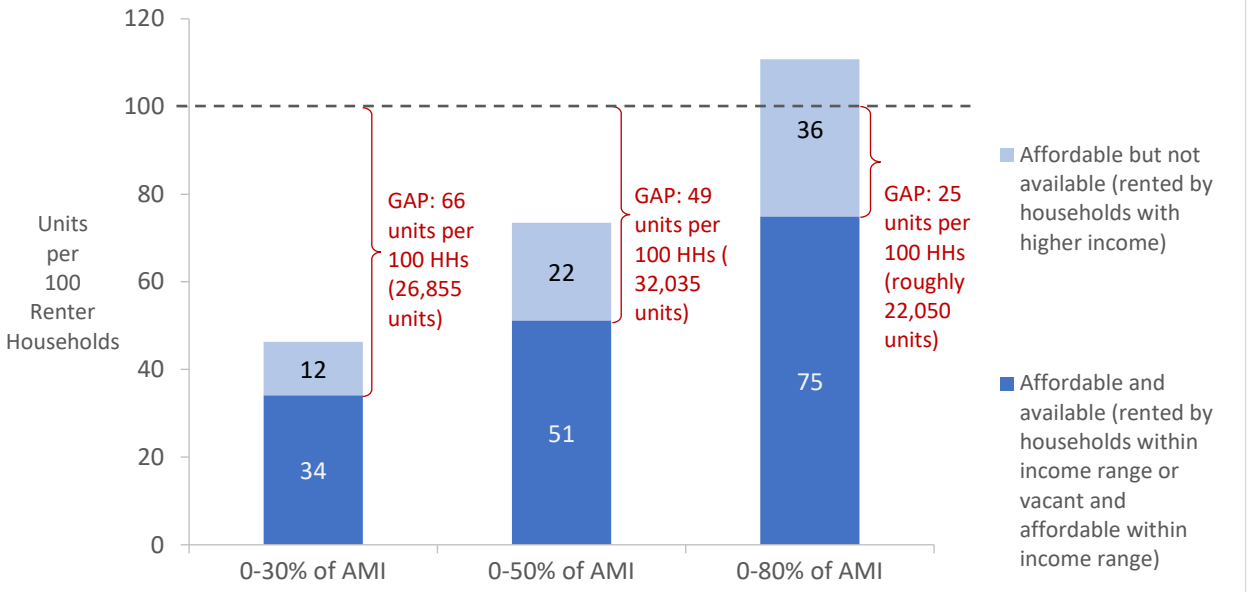
After taking this into account, we find that supplies of rentals at 30% of AMI and at 50% of AMI are extremely short and that the supply at 80% of AMI is also insufficient. As shown in Figure A-104, there are only:

- 34 affordable and available rental units for every 100 renter households with incomes at or below 30% of AMI,

[116] This analysis for Seattle is based on the affordability and availability methodology described in "Measuring Housing Affordability," by Paul Joice of HUD. The affordability and availability approach has been widely adopted for modelling gaps between rental housing needs and supply at low-income levels. Examples include the analysis of affordability and availability by the National Low Income Housing Coalition's 2023 report "The gap: A shortage of affordable homes" and HUD's "2021 Worst Case Housing Needs Report to Congress."

- 51 affordable and available units for every 100 renter households with incomes at or below 50% of AMI, and
- 75 affordable and available rental units for every 100 renter households with incomes at or below 80% of AMI.

Figure A-103
Rental Housing Affordability and Availability
2019 5-Year Estimates



Source: CHAS tabulations of ACS 2015-2019 5-year estimates, U.S. Census Bureau and HUD.

Notes: CHAS data do not distinguish between rent/income-restricted housing and market-rate units without such restrictions. Housing unit estimates in this table exclude units that lack complete plumbing or kitchen facilities as HUD considers such units substandard.

And yet, even these statistics underestimate unmet needs for affordability.

- This standard methodology likely overstates affordability within each income band, because households with incomes at the lower end of the band are less able to afford housing that would be affordable to households at the top of the band.
- Households experiencing homelessness, who are by definition not finding housing that is affordable and available, are not included in this analysis. (For information about the size and needs of the unhoused population see the Homelessness section later in the Appendix.)
- The analysis does not include households displaced from Seattle and other households who want to live in Seattle but reside in surrounding areas so they can afford housing.
- Because the analysis is based on pooled data gathered over five years, it does not fully reflect the increased rents being charged at the end of the period.

Zoned Development Capacity

As part of the major update to the Comprehensive Plan, the Office of Planning and Community Development (OPCD) has updated estimates of Seattle's development capacity to accommodate new housing and jobs. The analysis of the city's zoned development capacity evaluates the supply of housing and employment floor area, under the existing zoning regulations, that could be produced by the end of the twenty-year planning period ending in 2044.

While Seattle's development capacity analysis represents a snapshot of what current zoning can feasibly accommodate it does not attempt to predict market demand for a particular type of development nor does it estimate how much or how quickly development will occur in coming years.

Based on current zoning, OPCD estimates that the city has development capacity to add approximately an additional 168,000 housing units and 242,000 jobs. The existing development capacity is sufficient to accommodate the minimum requirement for growth under the adopted Countywide Planning Policies of 80,000 housing units and 158,000 jobs over the 20-year planning period.

OPCD's development capacity model is updated at the beginning of each comprehensive plan update process. These results were initially included in the King County Urban Growth Capacity Report (2021) in compliance with the state "buildable lands" requirements, using 2019 as a base year.[117] (RCW 36.70A.215). The results summarized in this section are based on a model updated to reflect August 2022 development site and zoning data.

The development capacity model provides the City with data to help us evaluate how well the city is prepared to accommodate future growth in housing and jobs, including minimum targets for the new 20-year planning period (with a horizon year of 2044) adopted by the GMPC.[118]development capacity estimates produced by the model are one among several data points that are used to inform an updated growth strategy in the One Seattle Plan. Other key data include growth and market trends, including data reported elsewhere in this appendix about high demand for housing in the city, growth outpacing the city's current GMA targets, rapid increases in home prices and

[117] GMA requirements for the buildable lands analysis are in Revised Code of Washington (RCW) 36.70A.215. Visit King County's Urban Growth Capacity webpage to find out more information about recent reports and planning as part of the Buildable Lands requirements.

[118] The GMA requirements for analysis of development capacity in local comprehensive plans are found in RCW 36.70A.070(2)(c), which requires Seattle to identify "sufficient capacity of land for housing including, but not limited to, government-assisted housing, housing for moderate, low, very low, and extremely low-income households, manufactured housing, multifamily housing, group homes, foster care facilities, emergency housing, emergency shelters, permanent supportive housing, and within an urban growth area boundary, consideration of duplexes, triplexes and townhomes." This Zoned Development Capacity section in the Housing Appendix and the Land Capacity and Housing Affordability Analysis herein, in combination with the Emergency Housing and Shelter section, address these requirements in the GMA. Manufactured housing is allowable in Seattle so long as it is consistent with building code. Group homes and foster care facilities are allowed in any zone where residential uses are allowed.

rents, declining affordability for low and even moderate-income households, and increased risk of displacement. Maintaining ample capacity for future residential growth across the city is needed to not only meet our statutory obligations, but also meet our goals to become a more affordable, resilient, and equitable city.

Development Capacity Methodology

The capacity model estimates the amount of potential additional development in the city by comparing existing land uses, housing units and non-residential square feet to the development that could be built under current zoning regulations. The difference between potential and existing development yields the capacity for new development. This capacity is measured as housing units, non-residential floor area square feet and the number of potential jobs accommodated by that floor area. The capacity model uses a range of data sources and assumptions, including building and density trends, environmentally critical areas, and estimated market availability of land.

Key model steps include the following:

- Analyzing recent building trends, including actual densities achieved in each zone category,
- Identifying sites that are generally assumed to not be available for future housing or commercial development, such as public lands,
- Identify vacant and redevelopable sites based on the amount of underdevelopment relative to a site's potential,
- Identify and remove environmentally critical areas,
- Apply a market factor reduction to account for the reality that not all properties will become available for development during the 20-year planning period,
- Estimate capacity for housing and commercial floor area based on assumed densities that are consistent with recent development trends.

More detailed documentation of the capacity model are available online in the Zoned Development Capacity background paper.

Zoned Development Capacity throughout the City

Overall, Seattle's current zoning provides development capacity to accommodate more than 168,000 additional housing units during the next 20 years, beyond the existing 391,000 units in the city today. The following sections describe the zoned development capacity by the types of housing that zoning typically supports, and by growth area of the city.

The primary purpose of this analysis is to inform land use and zoning changes enacted as part of the Comprehensive Plan update. The updated Growth Strategy described in the One Seattle Plan will increase capacity for more housing and new and more diverse types of housing across the city. The impact of those changes is not reflected in the current capacity model and won't be fully calculated until the final Plan is adopted along with implementing zoning.

CAPACITY ESTIMATES FOR MAJOR ZONING AND HOUSING TYPES

We consider the capacity for additional housing units by zoning category to understand the types of housing that can potentially be produced by potential unit types, as shown distributed throughout the city in Figure A-106. A zoning map is also included in Figure A-106 for reference. The results are further described in Figure A-105.

Capacity for higher-density multifamily and mixed-use residential building forms that typically result in stacked flats are grouped as follows:

- **Zones with > 85-foot height limits** have a combined 17 percent of the city's existing housing units (68,000 units) and 27 percent of capacity for new units (46,000 units). These zones allow for flats in multifamily and mixed-use buildings and have height maximums above 85 feet, typically requiring steel, concrete or cross-laminated timber construction when built to maximum height. This zone group includes Highrise Multifamily zones as well as mixed-use zones of Neighborhood Commercial, Commercial, Seattle Mixed, and Downtown.

- **Zones with 50- to 85-foot height limits** have a combined 31 percent of the city's existing housing units (119,000 units) and 56 percent of capacity for new units (95,000 units). These zones allow for flats in multifamily and mixed-use buildings and have height maximums between 50 and 85 feet, allowing for lower cost wood-frame construction. This zone group includes Midrise Multifamily zones, mixed-use zones of Neighborhood Commercial, Commercial, Seattle Mixed, and Downtown, and Lowrise 3 zones in Urban Centers or Urban Villages.

- **Zones with < 50-foot height limits** have a combined 7 percent of the city's existing housing units (27,000 units) and 4 percent of capacity for new units (7,000 units). These zones allow for flats in buildings under 50 feet in height, typically allowing for stacked flats up to 4 stories in height. This zone group includes mixed-use zones of Neighborhood Commercial and Commercial, as well as Lowrise 3 zones outside Urban Centers or Urban Villages.

Capacity for lower-density residential building forms are as follows:

- **Lowrise 1 and 2** have a combined 11 percent of the city's existing housing units (42,000 units) and 5 percent of capacity for new units (9,000 units). These zones allow townhouses, small apartments, and multiplexes, along with their ADUs, but typically result in townhouse and rowhouse development. This zone group includes Lowrise 1 and 2.

- **Residential Small Lot zones** have a combined 1 percent of the city's existing housing units (7,000 units) and 1 percent of capacity for new units (2,000 units). These zones allow for detached homes, ADUs, and small multiplexes on small lots. This zone group includes only Residential Small Lot zones.

- **Neighborhood Residential zones** have a combined 32 percent of the city's existing housing units (126,000 units) and 6 percent of capacity for new units (5,000 units). These zones allow for detached homes and up to two ADUs at a density of no greater than one principal

dwelling unit per 5,000 square feet. This group includes only Neighborhood Residential zones.

- **Accessory dwelling units (ADUs)**, including both attached and detached formats, are allowed in Lowrise, Residential Small Lot, and Neighborhood Residential zones. ADU estimates across each of those zones are included in this category. The estimated 20-year production for ADUs accounts for approximately 3 percent of capacity for new units (5,000 units).

- **Industrial zones** have a combined 0.1 percent of the city's existing housing units (400 units) and 0.0 percent of capacity for new units (81 units), which would consist exclusively of accessory or caretaker units. This group includes only industrial zones.

There are several key takeaways from Figure A-105:

- Almost ninety percent of housing unit development capacity is in high-density multifamily and mixed-used zones that typically produce flats. As the Housing Production section of this Housing Appendix points out, flats produced in recent years have been predominately 0-bedroom units (such as studios and small efficiency dwelling units), or 1-bedroom units.

- Fifty-six percent of housing unit development capacity is in the multifamily and mixed-use zones with 50 to 85 feet height limits. These zones allow for apartment types such as 5-over-1s and 6-over-2s, which maximize the construction cost efficiency for wood-frame construction. However, these zones cover just 10.6 percent of developable land area.

- About 7 percent of unit development capacity is in the Lowrise 1 and 2 and the Residential Small Lot zone groups. These zone groups are the most likely to result in middle housing types. Just 3 percent of capacity units are in Neighborhood Residential zones. An additional 3 percent of capacity is accounted for by additional ADUs that may be added in these zones.

- Neighborhood Residential zones constitute the greatest share of residential land area (63 percent) and are also a large proportion of the Vacant or Redevelopable land area (28 percent). Despite this, density limits mean that redevelopment of these properties would result in very few additional dwelling units, most of which would be ADUs. This capacity mismatch illustrates how existing Neighborhood Residential zones are limited in their ability to accommodate additional housing units under current zoning.

CAPACITY ESTIMATES FOR URBAN CENTERS AND URBAN VILLAGES

Development capacity can also be estimated for the existing Urban Centers and Urban Villages (UCUVs), which are the focus of planned growth in the Seattle 2035 Comprehensive Plan. More than 80 percent of the capacity for new housing is within existing UCUV boundaries.

About 35 percent of the city's overall residential development capacity is within Urban Centers (renamed Regional Centers in the One Seattle Plan). Of the six Urban Centers, Downtown has the greatest share of that capacity. Urban Villages (renamed Urban Centers in the One Seattle Plan) contribute 46 percent of Seattle's total residential capacity.

Figure A-104

Seattle Residential Development Capacity Model Estimates

	Land Area						Development Capacity			
	Total Zoned Land Area (Acres / % of Acres)		Total Developable Land Area* (Acres / % of Acres)		Vacant or Redevelopable Land Area* (Acres / % of Acres)		Existing Residential Units (Units / % of Units)		Residential Unit Development Capacity (Units / % of Units)	
TOTAL	38,501		29,064		3,759		391,402		168,167	
By Residential Building Form:										
Zones with > 85 ft. height limits	1,098	2.9%	1,014	3.5%	261	6.9%	67,939	17.4%	45,741	27.2%
Zones with 50 to 85 ft. height limits	4,019	10.4%	3,094	10.6%	1,104	29.4%	118,798	30.6%	94,641	56.3%
Zones with < 50 ft. height limits	1,304	3.4%	859	3.0%	248	6.6%	27,456	7.1%	7,001	4.2%
Lowrise 1 and 2	2,295	6.0%	1,874	6.6%	411	10.9%	41,911	10.7%	8,745	5.2%
Residential Small Lot	936	2.4%	862	3.0%	247	6.6%	7,335	1.9%	2,311	1.4%
Neighborhood Residential	24,096	62.6%	17,530	60.3%	1,051	28.0%	126,070	32.2%	4,727	2.8%
Accessory Dwelling Units**	-	-	-	-	-	-	-	-	4,920	2.9%
Industrial	4,753	12.3%	3,832	13.2%	437	11.6%	415	0.1%	81	0.0%
By Existing Growth Area:										
Inside Urban Centers (renamed "Regional Centers")	2,135	5.5%	1,755	6.0%	400	10.7%	111,834	28.6%	57,090	35.0%
Downtown	540	1.4%	477	1.6%	101	2.7%	34,696	8.9%	22,003	13.5%
First Hill/Capitol Hill	566	1.5%	425	1.5%	85	2.3%	40,139	10.3%	11,536	7.1%
Northgate	296	0.8%	234	0.8%	77	2.1%	5,171	1.3%	7,914	4.8%
South Lake Union	196	0.5%	160	0.6%	36	0.9%	11,199	2.9%	4,607	2.8%
University District	317	0.8%	247	0.9%	61	1.6%	11,792	3.0%	6,740	4.1%
Uptown	220	0.6%	212	0.7%	40	1.1%	8,837	2.3%	4,290	2.6%
Inside Urban Villages (renamed "Urban Centers")	4,296	11.1%	3,931	13.5%	1,382	36.8%	91,207	23.3%	75,732	46.4%
Manufacturing and Industrial Centers	4,552	11.8%	3,688	12.7%	408	10.8%	355	0.1%	74	0.0%
Remainder of City	27,519	71.5%	19,689	67.7%	1,569	41.7%	188,186	48.1%	30,351	18.6%

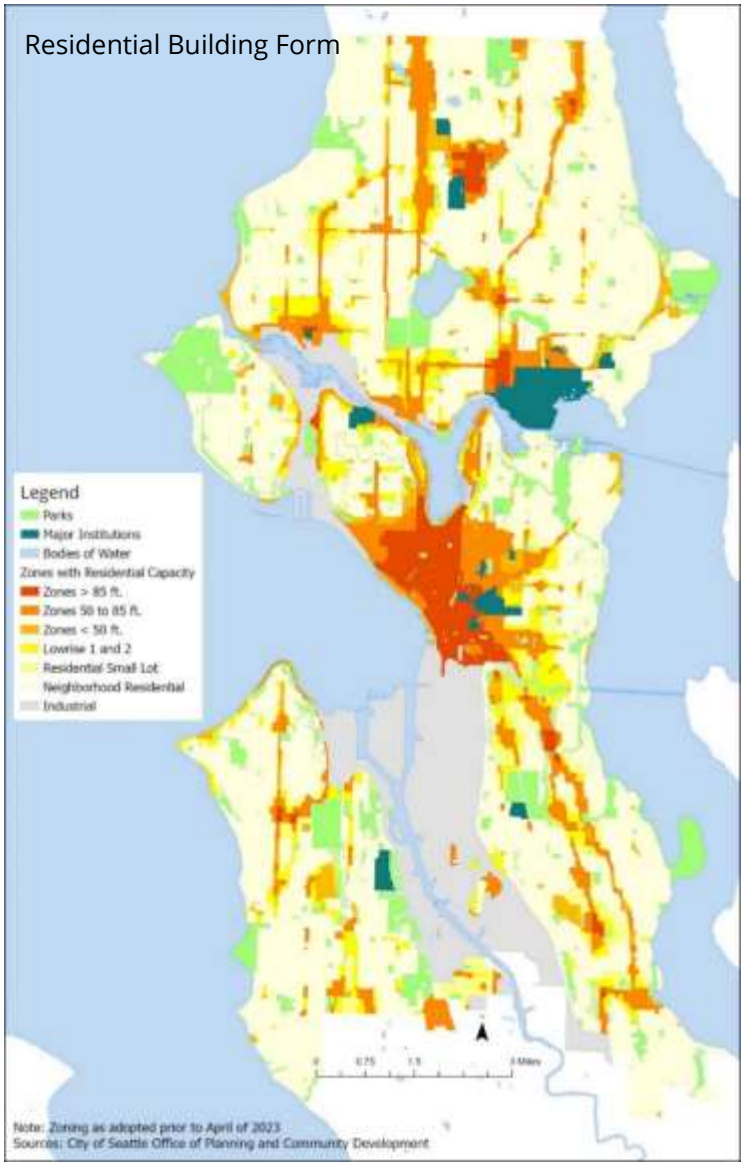
Source: Development Capacity Report, OPCD, May 2023

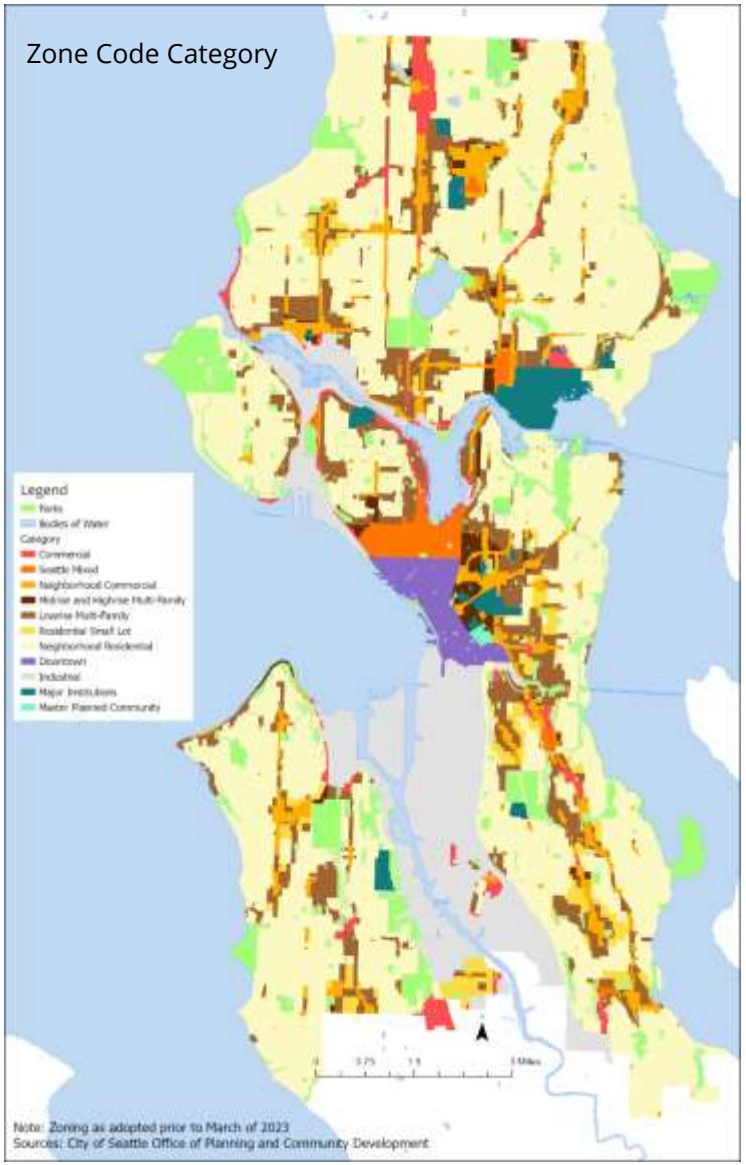
*Environmentally Critical Areas and Parks are not developable lands but have zoning, much of which is Neighborhood Residential – which are included in the "Total Zoned Land Area" but excluded from the "Total Developable Land Area" column. Major Institutions are also excluded, as these institutions follow their own development plans (e.g., Harborview, University of Washington).

**ADUs estimates are for both attached and detached ADUs. Existing ADUs are counted in the Existing Residential Units in Neighborhood Residential, Residential Small Lot and Lowrise zones. The ADU capacity estimate is calculated by doubling the 10-year estimate from the ADU Final EIS's Preferred Alternative (Pg. 4-203).

Figure A-105

Zones Grouped by Residential Building Form and Category





Land Capacity and Housing Affordability Analysis

As described in the Growth Targets and Housing Needs Projections section of this appendix, pursuant to recent changes to state GMA requirements, the GMPC adopted in 2023 housing needs projections for each of several income ranges as well as the need for permanent supportive housing (PSH) for each city in King County. The GMA also requires that local comprehensive plans document that existing zoned capacity may be capable of meeting those needs.

Seattle's analysis of capacity to meet affordable housing needs is summarized in this section. We use the development capacity model along with the analytical steps shown in Figure A-107 that reflect guidance provided by the State Department of Commerce.

Figure A-106
Steps for the Land Capacity and Housing Affordability Analysis

Source: Washington State Department of Commerce Guidance for Updating Your Housing Element

SUMMARIZE LAND CAPACITY BY ZONE

The first step of the Land Capacity and Housing Affordability Analysis involves classifying the City's residential zones into groupings based on the resulting housing unit types and level of affordability.

Over one hundred zoning codes throughout the city were summarized into seven groups, as shown in Figure A-105 in the previous section. Industrial zones, which were largely limited in residential development capacity to caretaker units and artist studios, are excluded from the Land Capacity and Housing Affordability analysis.[119]

We summarize the results of the development capacity model, which is conducted at the development site level, by these zone groups, which are shown in Figure A-105 in the previous section.

CATEGORIZE ZONES BY ALLOWED HOUSING TYPES AND DENSITY LEVEL

Zone groups are reflective of zones where housing developments are similar in type. Housing type refers to the height, density, material, and unit forms typically built in each zone. Figure A-108 describes these zone groups as they relate to housing types.

In addition, we considered where income restricted housing is developed when forming these zone groups and housing types. For example, separating multifamily zones with height limits under 50 feet from those which have 50 to 85 ft. height limits was based on deliveries of income-restricted housing developments from 2013 to 2021.[120] During this period, 74 percent of units that came into service were in buildings between 5 and 8 stories, which we estimate to be approximately 50 to 85 ft. in height. Just 21 percent of units were in buildings 4 stories or under, or typically less than 50 ft. in height. In addition, just 5 percent of units were in buildings greater than 8 stories, which would be approximately 85 feet or taller.[121]

[119] This development capacity model was created prior to City of Seattle adoption of the Industrial and Maritime Strategy in July of 2023.

[120] This definition includes buildings that receive subsidies and public finance provided by nonprofit or private affordable housing developers, but excludes buildings which only participate in MFTE, MHA, or IZ programs.

[121] For information about subsidized housing, our analysis uses the King County Income-restricted Housing Database, which the King County Department of Community and Human Services developed in collaboration with Seattle, other cities, and the Puget Sound Regional Council. This database includes all rent-restricted units within Seattle, and thus the total number of units may differ from data on the individual portfolios of the City of Seattle, the Washington State Housing Finance Commission, or the Seattle Housing Authority. OPCD then joined this dataset to King County Assessors data to determine the number of rent-restricted units by building type in buildings that were built between 2013 and 2021. Units in the development pipeline that were not yet in service by 2021 are not included.

Figure A-107
Land Capacity and Housing Affordability Analysis Density Level Assumptions

Zone Groups	Typical Housing Types allowed
Zones with > 85 ft. height limits	Multifamily flats in buildings with approximately 9 or more floors (maximum height higher than 85 feet and max residential FAR between 4.5 and 30) and generally requiring steel, concrete, or cross-laminated timber construction.
Zones with 50 to 85 ft. height limits	Multifamily flats in buildings with no more than 8 floors (maximum height higher than 50 but no more than 85 feet and max residential FAR between 2.3 and 6.25) allowing for wood timber construction, up to 6-over-2.
Zones with < 50 ft. height limits	Multifamily flats in buildings with typically no more than 4 floors (maximum height no more than 50 feet with a max residential FAR of 1.8 to 3)
Lowrise 1 and 2	Townhomes and small multiplexes allowed, but townhomes largely encouraged (maximum height no more than 40 feet with a max residential FAR of 1.3 to 1.6)
Residential Small Lot	Detached homes, cottages, and small multiplexes (maximum height no more than 40 feet with a max residential FAR of 0.75)
Neighborhood Residential	Detached single-family homes (Up to 0.5 FAR and no more than one principal dwelling unit for every 5000SF of lot area)
Accessory Dwelling Units	Attached and Detached Accessory Dwelling Units, which are allowed in Neighborhood Residential, Residential Small Lot, and Lowrise Zones throughout the city.

Figure A-109 further describes the density ranges of the individual zones in each zone group. We present density ranges in terms of floor area ratio (FAR), residential density, and height maximums. The figures in the table reflect what is allowed under current zoning, which is used to estimate development capacity, as well as data on recent development outcomes and market trends.

Figure A-108
Zone Groups Related to Density Levels

Zone Groups	Housing Types Typically Allowed	Residential Max Floor Area Ratio (FAR)	Assumed Residential Density (Units/Acre)	Height Maximum (Feet)
Zones with > 85 ft. height limits	Multifamily flats, approximately 9 stories or more	4.5 - 30 FAR	196 – 1,307 Units/Acre	95 - 1000 feet
Zones with 50 to 85 ft. height limits	Multifamily flats, approximately 5 to 8 stories	2.3 - 6.25 FAR	54 - 272 Units/Acre	50 - 85 feet
Zones with < 50 ft. height limits	Multifamily flats, approximately 4 stories or less	1.8 - 3 FAR	54 - 131 Units/Acre	30 - 45 feet
Lowrise 1 and 2	Townhomes, small multiplexes, and ADUs	1.3 - 1.6 FAR	34 Units/Acre	30 - 40 feet
Residential Small Lot	Detached homes, ADUs, cottages, small multiplexes	0.75 FAR	22 Units/Acre	30 feet
Neighborhood Residential	Detached homes, ADUs	0.5 FAR	5 - 9 Units/Acre	30 feet

RELATE ZONE CATEGORIES TO POTENTIAL INCOME LEVELS AND HOUSING TYPES SERVED

We next use recent market and development data to determine the lowest income level that various types of new housing can reasonably be expected to accommodate. We considered each form of housing described in Figure A-109 to provide an understanding of the income levels at which market rate and subsidized housing developments are able to serve households.

We estimated the lowest potential income levels served for each zoning group based on three individual analyses:

- As described in the Ownership Housing section of this Housing Appendix, we estimate income necessary to afford the monthly costs of newer homes sold in 2022 that were built between 2013 and 2022.
- We modeled multifamily rental data to look at affordability levels by number of bedrooms and building form. Our model employs CoStar data on effective unit rents in 2022 for market-rate units developed between the beginning of 2013 to the end of 2022. We supplement rent data from Costar with average costs for tenant-paid utilities by number of bedrooms from ACS Microdata obtained from IPUMS-USA.
- Finally, we conducted spatial modeling of subsidized housing developments that came into service from the beginning of 2013 to the end of 2021 to estimate which zones and building types were more likely to accommodate subsidized housing in the future.

The following findings informed our final classification of zone groups to different levels of income represented in our housing needs projections:

- Current development in the for-sale housing market largely caters to households that have incomes well above 120% of AMI. However, new ADUs sold as individual units, zero-bedroom and 1-bedroom stacked flats sold as condominiums, and townhomes are sold at prices closer to, but still above, 120% of AMI. Recently developed principal dwelling units sold separately from ADUs, stacked flats with 3+ bedrooms sold as condominiums, and detached homes are sold at substantially higher price points.

- In the unrestricted rental market, multifamily developments over 8 stories (over approximately 85 feet in height) are primarily affordable to households with incomes above 120% of AMI. In comparison, new unrestricted apartments in multifamily buildings shorter than 8 stories tend to be affordable to households with incomes in the > 80 to 120% of AMI range. However, the affordability of apartments greatly depends on their size, configuration, and location throughout the City. The Affordability Levels of Apartment Rents section of this housing appendix highlights the great variability in the affordability of apartments by size. That section demonstrates that zero-bedroom and 1-bedroom units smaller than 400 square feet are much more affordable than apartments with the same number of bedrooms larger than 400 square feet. This is one factor driving the deeper affordability of 0-bedroom and 1-bedroom units relative to units with 2 or more bedrooms, even after adjusting for household size. Newly developed 3-bedroom units, of which there are very few, are primarily affordable to households with incomes above 120% of AMI, regardless of building height.

- Income-restricted rental housing is primarily developed in buildings between 5 and 8 stories (approximately 50 to 85 ft. in height). Units developed in wholly income-restricted rental housing developments that serve lower income levels and receive public financing are primarily in buildings with 8 stories or fewer. In comparison, low-income housing in taller buildings is rare and typically involves disposition of surplus public property at no cost to the affordable housing developer.

- Income-restricted for-sale housing is limited in its local scalability (e.g., it takes the form of smaller dispersed projects that represent a relatively few units overall added to the stock) compared to both income-restricted rental housing and the for-sale housing market. Newly developed for-sale housing that is subsidized has typically been constructed as townhomes in recent years; however, there has been a shift in development to include flats sold as condominiums in multifamily zones between 45 and 85 ft. in height as well. For this analysis and in recognizing the limited scalability of income-restricted for-sale housing, we do not assume affordability at or below 120% of AMI for zones which tend to produce townhomes.

These results inform our assumptions about the deepest affordability levels that the City's development capacity can serve, which are presented in Figure A-110.

Zones with 50 to 85 ft. height limits are assumed to be affordable to households 0 to 80% of AMI and PSH at their deepest level of affordability. Income-restricted apartments subsidized by the City serve households with incomes of 60% of AMI or less (e.g., at or below 30% of AMI for PSH). A vast majority of subsidized rental housing produced in recent years was at the densities allowed by these

zones. Market-rate rental housing affordable to households with incomes 61 to 80% of AMI was also more common in this zone category, as well as micro-units that were more deeply affordable. While buildings with and without income-restricted units affordable to households in these lower income bands have vastly different financing and development structures, they are grouped here in one 0 to 80% of AMI category due to similar building scale and height.

We assume developments in Zones with < 50 ft. height limits to be affordable to households > 80 to 120% of AMI, particularly as recent unrestricted rental developments in these zones have served households in this income band, and as there has been less income-restricted housing development in these zones in recent years. Based on market data for both for-rent and for-sale housing, developments in all other zone groups are assumed to be affordable to households whose incomes are > 120% of AMI.

It is important to note that even if a given zone can theoretically accommodate additional income-restricted housing, this analysis did not consider other factors such as the availability of funding. These barriers are discussed more in the Income-Restricted Housing section and Barriers and Actions section.

Figure A-109
Lowest Potential Income Served by Zone Groups

Zone Groups	Approximate Income Served		Assumed Affordability Level for Capacity
	Market Rate	With Subsidies	
Zones with > 85 ft. height limits (Multifamily flats in buildings above 8 floors)	>80 to 120% of AMI**; >120% of AMI	Not typically feasible at scale	>120% of AMI
Zones with 50 to 85 ft. height limits (Multifamily flats in buildings between 5 and 8 floors)	>50 to 80% of AMI*; >80 to 120% of AMI	0 to 60% AMI and PSH	0 to 80% of AMI and PSH***
Zones with < 50 ft. height limits (Multifamily flats in buildings with typically no more than 4 floors)	>50 to 80% of AMI*; >80 to 120% of AMI	Not typically feasible at scale	>80 to 120% of AMI
Lowrise 1 and 2 (i.e., Townhomes, multiplexes, and ADUs)	>120% of AMI	Not typically feasible at scale	>120% of AMI
Residential Small Lot (i.e., Cottages, multiplexes, small lot detached homes, and ADUs)	>120% of AMI	Not typically feasible at scale	>120% of AMI
Neighborhood Residential (i.e., Detached single-family homes, and ADUs)	>120% of AMI	Not typically feasible at scale	>120% of AMI

*We only found 0-bedroom and 1-bedroom units to be affordable to households with incomes >50% to 80% of AMI in our analysis of CoStar Effective Market Rents.
**We only found 0-bedroom and 1-bedroom units to be affordable to households with incomes >80% to 120% of AMI in our analysis of CoStar Effective Market Rents.
***Based on the information in the prior section, as well as state and local funding policies, City-funded rental apartments serve households with incomes up to 60% of AMI, Certain market incentives produce income-restricted units affordable between 61 and 80% of AMI. These incentives may not achieve below-market rents in certain neighborhoods or for certain unit configurations, such as micro-units.

SUMMARIZE CAPACITY BY ZONE CATEGORY

Once assumed affordability levels have been determined for each housing type, we relate these affordability levels back to zone groups and aggregated housing unit development capacity. These are described in Figure A-111.

Figure A-110
Development Capacity by Zone Group and Assumed AMI

Zone Groups	Vacant or Redevelopable Land Area (Acres / % of Acres)		Residential Development Capacity (Units / % of Units)		Assumed AMI Level
Zones with > 85 ft. height limits	261	7.8%	45,741	27.2%	> 120% AMI
Zones with 50 to 85 ft. height limits	1,104	33.3%	94,641	56.3%	0 to 80% of AMI and PSH
Zones with < 50 ft. height limits	248	7.5%	7,001	4.2%	> 80 to 120% AMI
Lowrise 1 and 2	411	12.4%	8,745	5.2%	> 120% AMI
Residential Small Lot	247	7.4%	2,311	1.4%	> 120% AMI
Neighborhood Residential	1,051	31.6%	4,727	2.8%	> 120% AMI
Accessory Dwelling Units	-	-	4,920	2.9%	> 120% AMI
Total**	3,322		**168,086**		

Source: Development Capacity Model, OPCD, May 2023
*Based on existing boundaries as adopted prior to May 2023
****This number excludes zones that do not currently carry residential capacity, as well as the units limited to caretaker units in industrial zones

COMPARE PROJECTED HOUSING NEEDS TO CAPACITY

The final step in the analysis compares the capacity to projected housing needs by income level. We aggregate housing needs based on the forms of housing likely to accommodate them, as is consistent with Commerce guidance. This results in three groups of aggregated housing needs: 0 to 80% of AMI including PSH, >80 to 120% of AMI, and >120% of AMI.

We use a "discrete" level of analysis, which uses an exclusive one-to-one match of housing type to affordability level, along with a cumulative analysis to show that Seattle currently has sufficient capacity for the housing types and densities that can support development to meet projected needs at all income levels.

When allocating capacity to discrete income bands, we identify sufficient capacity for households at >120% of AMI and at 0 to 80% of AMI including PSH, but not for the band >80 to 120% of AMI Figure A-112 shows that Seattle only has 60 percent of development capacity required through 2044 for households in the 80 to 120% of AMI category using the discrete method. This deficit is a result of only accounting for Zones with <50 ft. height limits when counting capacity for the >80 to 120% of AMI band.

Results from the market analysis, presented in the Affordability of Recently Developed Housing, show however that unsubsidized housing development in Zones with <50 ft. height limits and Zones with 50 to 85 ft. height limits can serve households with incomes >80 to 120% of AMI. Thus, we present a Cumulative Capacity to demonstrate that when accounting for all zones that would serve

households with incomes >80 to 120% of AMI, there is sufficient development capacity for this, and therefore, all income bands.

Meeting this minimal GMA and county requirement is necessary, but not sufficient to address our housing needs and goals going forward. Additional analyses in this appendix and goals and policies in the Comprehensive Plan address other considerations, including the need for substantial funding sources to realize our potential to provide subsidized income-restricted housing, increasing neighborhood racial and economic inclusivity, providing additional capacity for middle housing with opportunities for more family housing and more homeownership, prevention of displacement of vulnerable populations, targeting growth in areas that are well served by transit and other amenities, and growth of climate and economically resilient neighborhoods where all households have their daily needs met.

Finally, this analysis has several technical limitations due to its ability to only look at overall affordability and unit production.

- **Development of varying unit sizes:** This analysis does not account for the size of unit development. Current market production is largely limited to zero-bedroom and 1-bedroom units, which are not apt to serve the needs of families with children or multigenerational households.
- **Neighborhood level variation in cost and affordability:** This analysis only considers forms and production of housing based on affordability ranges, whereas Seattle's housing market produces a large variety of housing within these income ranges. For example, newer condos, middle-housing, and townhomes are sold at prices affordable closer to 120% of AMI, whereas new detached homes are typically affordable only to households of much higher incomes. Similarly, some neighborhoods around Seattle have produced housing that is more affordable due to land costs and the forms of housing available.
- **The role of existing housing in housing market affordability:** This analysis is limited in its focus on production. It does not consider the critical role that the older housing stock plays in Seattle, in particular how units in older multifamily buildings are more affordable at lower income ranges and provide much of the housing for low-income households across Seattle.

Figure A-111

Zoned Land Development Capacity Analysis and Projected Net New Housing Needs 2019-2044[122]

Housing Needs (AMI %)	Projected Net New Housing Units Needed	Zone Groups Serving These Needs	Aggregated Housing Unit Need	Capacity Units	Vacant or Redev. Land in Acres	Discrete Capacity Surplus/ Deficit	Cumulative Capacity Surplus/ Deficit
0 to 30% of AMI, PSH	15,024	Zones with 50 to 85 ft. height limits	70,726 (63.1%)	94,641 (56.3%)	**1,104 (33.2%)**	**+23,915 (134%)**	**+23,915 (134%)**
0 to 30% of AMI, Non-PSH	28,572						
> 30 to 50%	19,144						
> 50 to 80%	7,986						
> 80 to 100%	5,422	Zones with <50 ft. height limits	11,572 (10.3%)	7,001 (4.2%)	**248 (7.5%)**	**-4,571 (60%)**	**+19,344 (124%)**
>100 to 120%	6,150						
> 120%	29,702	Zones with > 85 ft. height limits, Lowrise 1 and 2, Neighborhood Residential, Residential Small Lot, ADUs	29,702 (26.5%)	66,444 (39.5%)	**1,970 (59.3%)**	**+36,742 (224%)**	**+56,086 (150%)**
Total	**112,000**		**112,000**	**168,086**	**3,322**	**+56,086 (150%)**	**+56,086 (150%)**

[122] Permitting monitoring shows that Seattle has added 24,051 housing units between 2019 and 2023 and is on track to gain a total of 32,000 units for the 5-year period of 2020 to 2024. This leaves approximately 80,000 units in our 112,000-unit 2019-2044 target, the former of which is referenced throughout the Comprehensive Plan as our 20-year growth target. The LCHAA is not prorated for these 5-years of development; however, all development prior to October 2022 was incorporated into the development capacity model. If we reduced aggregated housing needs for the 20-year period, it would show even higher cumulative surplus capacity for projected housing need.

Housing Production Barriers and Actions

This section summarizes barriers to housing production that contribute to shortfalls in meeting the needs by type and affordability. It broadly outlines actions the City could take to begin closing those gaps. This section of the appendix addresses new requirements in the GMA, guidance from the Department of Commerce, and Countywide Planning Policies.

Barriers that limit the production, support, and rehabilitation of income-restricted housing permanent supportive housing, and emergency housing are discussed in later sections.

Barriers

REGULATORY AND PERMITTING BARRIERS

Some barriers to housing production that impact Seattle's ability to accommodate housing demand and meet housing needs, stem from how the City regulates and permits housing. Consistent with the requirements of HB 1220, this section summarizes some ways those barriers arise in Seattle's regulations and outlines actions the City is considering to reduce them.

Zoning

Zoning is a tool that is used to shape and guide development in the city, but zoning can also constrain housing supply and production. Zoning determines whether housing is allowed in a given area and, if it is, how much and what types. More indirectly, zoning can influence the feasibility of housing development and affordability of housing produced. In Seattle, most land where zoning allows housing is designated Neighborhood Residential, a zone that historically has allowed primarily low-density detached housing. More recently, Seattle adopted more permissive rules for the development of attached and detached accessory dwelling units (ADUs) that effectively allowed up to three units per lot in Neighborhood Residential zones. Even with this change, restrictions imposed by NR zoning across 60% of the developable land area in the city have contributed to constraining new housing production, especially housing that is scaled to accommodate larger households and families and more affordable forms of ownership housing in more areas.

Development Standards

Where zoning broadly governs where housing is allowed across Seattle, a zone's development standards determine specific housing outcomes for a particular site. To regulate how much housing is allowed, Seattle's residential zones rely primarily on maximum height, floor area ratio (FAR), and/or lot coverage limits. Certain low-density zones also use a maximum density limit to determine the number (and consequently size) of homes allowed on a site, though most residential and mixed-use zones in Seattle do not have outright limits on density in the Land Use Code. Other development standards also affect the form, layout, and configuration of buildings and therefore influence the viability of housing development. These include standards regarding the maximum size and length of facades; modulation requirements; setbacks; and design standards. In some cases, the interaction of development standards and market forces results in less housing being built on a site than what its zoning allows and can impact overall economic feasibility for redevelopment.

Accessory dwelling units (ADUs). Seattle reformed its ADU regulations in 2019, removing key barriers to production like owner-occupancy requirements, minimum parking, and a one-per-lot limit, catalyzing a fourfold increase in ADU permits within just a few years. Alongside this jump in production has been a rise in the frequency of ADUs built by homebuilders and offered for sale as condominium units as part of a redevelopment of a full site.

Currently, Seattle is developing legislation to fulfill requirements adopted in 2023 in HB 1337, most provisions of which Seattle already complies with thanks to the 2019 reform. Remaining barriers that Seattle will address to comply with HB 1337 include increasing ADU height limits, allowing two detached ADUs on one lot, and allowing ADUs on any lot meeting minimum lot size requirements.

Parking requirements. HB 1110 requires Washington cities and counties to allow middle housing on nearly all residential lots. Demand is high for small-scale ownership housing, evidenced by the rise in ADU condominiums in recent years. On the relatively small sites where middle housing is built, off-street parking has an outsized impact on the design, layout, and potential density of a given property. Off-street parking necessitates driveways, area for turning movements, and either space for surface parking or garages that reduce the amount of a home's living space. Minimum parking requirements limit the opportunity to develop without or with less parking, where homes can be larger and more site area can go to other uses, like open space.

Barriers to stacked forms of middle housing. Several regulatory barriers make stacked housing, which is capable of more efficient site layouts, difficult to produce at the scale of middle housing. Producing stacked flats for homeownership generally means forming a condominium, which subjects the builder and project to construction defect liability and heightened building envelope requirements in state condo law. Locally, stacked housing with more than two homes is regulated under the Seattle Building Code rather than the Seattle Residential Code, with stricter life safety requirements that add to the project cost. Together, these factors combine to make certain middle housing forms, like stacked flats, exceedingly rare in new construction, limiting the number of one-story and accessible homes available in low-density zones.

Midrise housing setbacks. Midrise housing of between five and eight stories produces stacked units that tend to be offered for rent more often than for sale. In Neighborhood Commercial zones, development can include a mix of uses, but residential is usually the predominant one. These zones have relatively few development standards that directly hamper housing production, as setbacks and FAR limits are more generous. Zoning that allows seven or eight stories of height tends to produce the most cost-efficient multifamily housing, as builders can maximize the number of lower-cost wood-frame stories allowed under construction codes. Midrise zones are subject to street- and upper-level setback requirements that can require modulation that reduces the quantity of housing allowed and adds complexity and cost to construction.

PERMITTING TIMES

The time required to receive a permit to build also affects our ability to produce housing. Seattle's permitting process involves several types of review, including compliance with not only zoning and land use regulations but also construction codes (the Seattle Building Code for most multifamily housing and the Seattle Residential Code for detached houses, duplexes, and most townhouses);

regulations for drainage, stormwater, and environmental factors; requirements for street and utility improvements; and many others.

Seattle's land use code is complicated and can be unclear to applicants. In many cases, this is due to code amendments adopted in response to initiatives and concerns unique to one development type or even a specific class of developers or site. The complexity of the permitting process, itself a natural consequence of an increasingly complex regulatory environment, often results in applicants needing professional consultants to navigate housing development, particularly for first-time housing developers.

While Seattle has in recent years lessened some of the reviews that apply to it, housing development must nevertheless navigate a series of permit approvals. Housing above a certain density goes through Seattle's Design Review process, where applicants present to and seek approval from a volunteer board in multiple meetings over a period of many months. Smaller projects may go through Streamlined or Administrative Design Review, which are administered by Seattle Department of Construction and Inspections (SDCI) staff. Using the City's Design Guidelines, Design Review covers how a new building fits into and relates to its surroundings, including overall appearance, relationship to its site and the street, building access, materials, and open space. These projects are also subject to the State Environmental Policy Act (SEPA), which involves review of the potential environmental impacts of a new building. The City will be making updates to its Design Review program to fulfill requirements in HB 1293 that design review processes use only clear and objective regulations.

Together, the need to pass many complicated reviews and change project aspects throughout the process can extend timelines and create bottlenecks for housing development. This in turn reduces the overall amount of housing produced and raises prices as delays boost holding costs and create uncertainty.

CONSTRUCTION COST AND FINANCING

Though largely outside the City's direct influence, many additional factors contribute to the availability to finance, cost to construct, and eventual price of housing.

Changes in the complex system of real estate financing, including interest rate hikes and many other variables, impact both large-scale multifamily developers and an individual household building an ADU. Interest rate hikes and cuts, which are determined by the Federal Reserve Bank, are deeply connected to housing production at a local level. Even where other barriers may not exist for projects, hikes can stall individual projects that may no longer be profitable to develop and temporarily prevent others from starting altogether. In the local market, this is experienced as a boom and bust of the real estate cycle.

When cost inputs increase, the feasibility of building housing can decline, sometimes precipitously. In recent years, for example, prices have greatly fluctuated for lumber and other raw materials used in housing construction but have ultimately risen over the longer term. Similarly, labor costs across all phases of housing development have escalated, especially during the period of high inflation in the early 2020s. These barriers are interrelated; longer permitting timelines can jeopardize financing

arrangements or introduce uncertainty into a project's pro forma (financial analysis) due to volatility in material costs.

Over a longer period, land costs have dramatically increased across Seattle, decreasing a developer's ability to redevelop sites to add housing. High land costs can prevent developers from assembling sites large enough to feasibly or efficiently develop with housing. In particular, site assembly may be necessary to create a development site large enough to develop multifamily apartments in neighborhoods with particularly small lots, especially in those neighborhoods formerly restricted to single-family.

Finally, City requirements that major infrastructure — public right-of-way, water, and utilities — be upgraded by the developer can be a significant barrier to housing production, particularly low-income housing. The cost of water, sewer, and storm main extensions, new electrical vaults, street resurfacing, and new sidewalks must be absorbed by development budgets, translating into higher housing costs for residents and in some cases rendering projects outright infeasible.

Actions to Address Barriers

Through the One Seattle Plan and other efforts, the City is considering strategies to address these barriers. Several respond to recently adopted state legislation that addresses the supply and affordability of housing, and others go above and beyond state requirements. These strategies include:

- **Zoning reform** to implement new state requirements for middle housing in HB 1110 which would allow at least 4 units on each residential lot and 6 units if within ¼ mile of a major transit station or where 2 units are affordable. Allowed types of middle housing include duplexes, triplexes, four-plexes, townhomes, stacked flats, and others.

- **Upzones** to implement the growth strategy that would allow stacked flats and apartments at a range of densities within Neighborhood Centers, center expansion areas, and along frequent transit arterials.

- **Modifications to development standards**, such as floor area ratio, intended to result in increased feasibility of housing development on more sites and larger units with 3 bedrooms in zones allowing middle housing. Modifications to development standards, such as height, FAR, and setbacks, in zones that allow apartments to increase capacity, decrease costs, and increase consistency for new development.

- **Incentives for the production of stacked flats** in zones that allow middle housing as a means of overcoming building code and condominium liability barriers that exist currently for this type of housing. Amendments to Seattle's ADU regulations to fulfill requirements in HB 1337 and encourage larger, family-sized ADUs.

- **Amendments to ADU regulations** to fulfill requirements in HB 1337 and encourage larger, family-sized ADUs.

- **Legislation to allow congregate housing**, which can offer lower price points through small homes, in more areas.
- **Reform of the Design Review program** to create objective criteria that streamline and simplify the process, as required in HB 1293.
- **Legislation exempting affordable housing from Design Review**, including projects that include on-site performance for MHA, and allowing housing developments subject to Full Design Review to opt into Administrative Design Review.
- **Permit process improvements** including collaboration across departments and with community organizations to reduce process and cost barriers facing lower- and moderate-income homeowners seeking to add housing on their property.

Income-Restricted Housing

Income-restricted housing helps lower-income households secure housing in Seattle. This section provides an overview of Seattle's income-restricted housing supply and strategies, including capital and operating funding, used to develop and preserve that housing. This section on income-restricted housing specifically focuses on housing units that have covenant restrictions but does not include housing that is low-cost for other reasons. The final portion of this section identifies actions that could address gaps between lower-income housing needs and supply to help achieve Seattle's affordable housing goals.

Income-Restricted Housing Supply

As of 2022, the estimated supply of rent- and income-restricted housing units in Seattle is approximately 34,000 rental units.[123] Slightly more than half of these units are City funded while the balance are income-restricted units that have no City funding but are still regulated by the City or another public agency. In addition, more than 250 owner-occupied homes are subject to resale restrictions to ensure ongoing affordability.[124] All future sales of these homes are restricted and must be affordable to eligible households with incomes at or below 80% of AMI.

Figure A-113 shows income-restricted rental units by affordability level. Actual AMI limits may be anywhere within an affordability band; for example, most rental units in the 51% to 80% of AMI band are subject to a rent and income limit of 60% of AMI.

As shown in the figure, 39 percent of rental units have affordability limits up to 30% of AMI, 18 percent have affordability limits of 31 to 50% of AMI, 41 percent have affordability limits between 51 and 80% of AMI (although most do not exceed 60% of AMI), and 2 percent are restricted at levels above 80% of AMI.[125]

Production and preservation of income-restricted rental housing is typically publicly funded and/or supported by private investment through the federal Low-Income Housing Tax Credit program. Rent for publicly funded rental housing is usually capped at levels affordable to households with incomes 60% of AMI or less. Some income-restricted rental units in largely market-rate buildings have limits above 60% of AMI. Income-restricted affordable units in market-rate buildings are typically provided as a condition of land use or incentive requirements.

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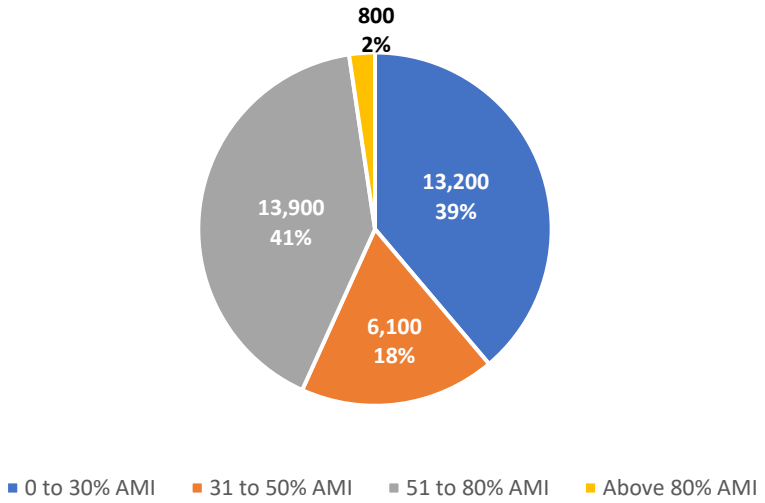
[123] The 34,000 estimate for rental units does not include units that came into service in 2022. The rental unit estimate, which comes from the King County Income-restricted Housing Database, includes City-funded income restricted housing, as well as income-restricted housing units not funded by the City.

[124] This estimate for homeownership units includes all units which came into service up through December 31, 2022.

[125] The King County database only provides data about the affordability limit of housing units. It does not include income data for resident households in these units, which may be lower than the affordability limits.

For-sale affordable homes are funded by a combination of public and philanthropic dollars (typically one-third of the development cost) leveraged by the eligible homebuyers' affordable mortgage and downpayment. Households eligible to purchase an affordable home have incomes no higher than 80% of AMI.

Figure A-112
Income Restricted Rental Unit Supply as of January 2022



Sources: King County Income-restricted Housing Database, developed through a survey of public regulatory agencies in collaboration with the Puget Sound Regional Council.

City Investments in Permanently Affordable Housing

Investment in permanently affordable housing is one of the most critical City actions to address public health and safety, prevent residential displacement, and reverse historic and ongoing harms to communities of color because of institutionalized discriminatory policies and practices.

This section of the Housing Appendix provides a high-level overview of the Seattle Office of Housing's efforts to produce and preserve affordable housing through various funding sources. As a City, we invest in income-restricted housing that other agencies, such as nonprofit affordable housing providers and SHA, own and operate. Funding and housing outcomes are summarized for OH's Rental Housing, Homeownership, Home Repair, and Weatherization programs, along with emergency rental assistance in response to the ongoing economic impacts of the coronavirus pandemic. This section also describes agreements with market-rate developers to include a modest share of income-restricted units affordable to low- and moderate-income families and individuals. Those units supplement Seattle's supply of City-funded low-income housing.

City investments in affordable housing infrastructure help advance racial equity, given the disproportionately high housing cost burden, displacement, and potential for homelessness experienced by people of color. The City makes special efforts to reach people of color and immigrant and refugee communities with the housing programs it funds. Based on available demographics of households that reside in City-funded housing or that receive other types of City-funded assistance, those programs serve greater shares of people of color and households with

lower incomes compared to the overall housing market.[126] For income-restricted units in otherwise market-rate buildings (provided as a condition of Multifamily Property Tax Exemption or Mandatory Housing Affordability requirements, for example), racial equity outcomes have not been documented to equal or surpass those achieved through City-funded affordable housing programs. The Office of Housing is working to improve collection and quality of demographic data for more thorough investigation of racial equity outcomes of the City's housing strategies.

RENTAL HOUSING PROGRAM

The OH portfolio of City-funded rental housing totals more than 18,000 affordable units in service, which is slightly more than half of the income-restricted units in Seattle. As of the end of 2022, funding has been awarded for approximately an additional 3,500 affordable apartments in the development pipeline. City-funded rental apartments are in all parts of Seattle where zoning allows for development of multifamily apartment buildings.

OH awarded $154.75 million in 2022 to build, acquire, and preserve 990 affordable rental homes in neighborhoods across Seattle. These investments support a spectrum of housing types for low-income residents, including supportive housing for those experiencing homelessness and apartments for low-income individuals and families.

Figure A-114 shows that in 2022, $137 million of the City's $154 million of capital investment in affordable rental was for the development of new housing. This $137 million of OH investments will result in additional investments totaling $144.6 million for new low-income housing, not including funding for ground floor commercial or community spaces. The $144.6 million supplementing City funding derives from multiple sources, with the largest being federal Low-Income Housing Tax Credit program private activity bonds and equity investment, which is administered by the Washington State Housing Finance Commission.

[126] City of Seattle, Office of Housing, 2022 Annual Investments Report, pages 39-42.

Figure A-113
New Production, Reinvestment, and Preservation Funds Awarded for Rental Housing (2022)

Fund Source	2022 Funding Awarded	Description
Seattle Housing Levy	$17M	The voter-approved 2016 Seattle Housing Levy[127] provides approximately $29 million per year for the rental housing program. Based on cumulative outcomes over the first six years of the current levy period, the Rental Production and Preservation Program exceeded its 7-year goals ahead of schedule.
Seattle Mandatory Housing Affordability (MHA) payments	$52.8M	In areas subject to MHA requirements, residential and commercial developers either make financial contributions for new low-income housing or include a modest number of affordable units as part of their developments.
Seattle Incentive Zoning / Housing Bonus payments	$4.95 M	In a few select zones not subject to MHA, residential and commercial developers can opt to achieve additional floor area by meeting Incentive Zoning requirements for affordable housing.
Other local funds, including JumpStart Payroll Expense Tax	$67.3 M	The Seattle Payroll Expense Tax is a business excise tax; a percentage of revenue is dedicated to affordable housing, including rental housing production.
Federal funds, which may include HOME, CLFR, or other	$12.2 M	The HOME Investment Partnerships Program (HOME) provides formula grants to states and municipalities to fund a wide range of activities including building, buying, and/or rehabilitating affordable housing. Coronavirus Local Fiscal Recovery Funds (CLFR), a part of the American Rescue Plan Act (ARPA), provide local governments resources to support households, businesses, and public services impacted by the pandemic.
Total	$154.3M	
Source: City of Seattle Office of Housing		

HOMEOWNERSHIP PROGRAMS

Development of New Affordable For-Sale Homes

For more than 20 years, OH has invested in the development of affordable for-sale homes. The homes are resale restricted to help provide permanent affordability for low-income homeowners. Initial sales prices are affordable to eligible buyer households who have incomes at or below 80 percent of AMI. In return for the opportunity to purchase a home at an affordable price, homebuyers agree to resale price limits to enable another low-income household to own their own home. These agreements balance initial homebuyers' need for affordability, stability, equity, and legacy with the desire of future homebuyers to experience those same benefits. OH, in partnership

[127] In 2022, the Office of Housing awarded Seattle Housing Levy funds approved by voters in 2016. The new Seattle Housing Levy was approved by Seattle voters in Fall 2023. Annual funding for the Rental Housing Program under the new 2023 Levy is $100 million.

with several nonprofit development and stewardship organizations, oversees a portfolio of roughly 275 owner-occupied homes with lasting affordability. The power of permanent affordability is that public investment in the development of each home serves multiple income-eligible buyer households well into the future. Nearly 200 more OH-funded resale-restricted homes will come on the market in the next few years.

Figure A-115 shows that in 2022, OH awarded $10.48 million to develop 95 permanently affordable homes at six sites for low-income homebuyers. Development of homeownership housing typically leverages between $4 and $5 per dollar spent of City funding. The homebuyer's mortgage, borrowed from a conventional mortgage lender, and their down payment amount constitutes the largest share of that leverage, averaging roughly two-thirds of the cost of each home. Other subsidy sources include State Housing Trust Fund, Federal Home Loan Bank, the U.S. Department of Housing and Urban Development's Self-Help Homeownership Program (SHOP), along with philanthropic and volunteer labor contributions.

Figure A-114
Permanently Affordable, Resale-restricted For-Sale Housing (2022)

Fund Source	2022 Funding Awarded	Description
Seattle Housing Levy	$5.8M	The 7-year Seattle Housing Levy dedicates $14.3 million to a variety of homeownership programs, including development of new permanently affordable for-sale housing and down payment assistance loans for income-qualified first-time homebuyers.
Seattle Mandatory Housing Affordability (MHA) payments	$3.78M	A portion of MHA payment proceeds (see description above, under Rental Housing) is used for development of permanently affordable, resale-restricted for-sale housing.
Mercer Mega Block sales proceeds	$910K	A portion of the proceeds from the City's sale of the Mercer Mega Block in 2020 was set aside to fund the development of permanently affordable homeownership in the Rainier Valley as part of the Rainier Valley Affordable Homeownership Initiative.
Total	$10.48M	
Source: City of Seattle Office of Housing		

Downpayment Assistance

OH-funded downpayment assistance (DPA) for homebuyers, also known as "purchase assistance," is administered through nonprofit partners. The amount available to each income-eligible household is currently $55,000. DPA is structured as a non-amortizing, 3 percent simple-interest, secondary loan due upon resale or refinance. DPA is often layered with other, non-City subsidies that help low-income, first-time homebuyers purchase homes available in the open market. Seattle Housing Levy-funded DPA loans that closed in 2022 supported eight homebuyer households with the purchase of their first homes.

Foreclosure Prevention Loans
In 2018, OH launched a pilot Homeowner Rescue Fund to help prevent home foreclosures. Since then, HomeSight, a local nonprofit partner, has originated 13 loans (including four in 2022). These loans enable eligible homeowners to retain ownership of their homes and continue living in the neighborhoods they call home. Despite the relatively modest volume of foreclosure prevention loan activity, this tool has been determined to be critical to City-led anti-displacement efforts. For that reason, it is now an ongoing program and no longer a pilot.

Home Repair Program
This program funds critical health and safety repairs, helping low-income homeowners preserve what is often their greatest financial asset and remain in their homes. In 2022, OH's Home Repair Program provided nearly $486,693 in loans and grants to 41 low-income homeowners to address critical health, safety, and structural issues. This funding was from a variety of sources, including Community Development Block Grant (CDBG) and the Seattle Housing Levy.

Weatherization Program
In 2022, OH's HomeWise Weatherization Program expended $4.73 million to provide energy efficiency and indoor air quality improvements in affordable apartment buildings serving low-income renters and single-family homes with low-income owners. This funding was from a variety of sources, including Seattle City Light, U.S. Department of Health and Human Services, U.S. Department of Energy, Bonneville Power Administration, Puget Sound Energy, and JumpStart Payroll Expense Tax revenue.

EMERGENCY RENTAL ASSISTANCE

In 2022, the City continued its work administering emergency rental assistance to provide stability for renters with low incomes who were economically impacted by the COVID-19 pandemic.

To distribute available funds, the City employed a three-pronged strategy that reached more than 10,000 Seattle renters whose housing stability was jeopardized by the pandemic's economic impacts. This approach to program implementation emphasized efficient and trusted partnerships, through:

- A direct contract with United Way of King County, building on their strong foundation of existing eviction prevention work;
- Innovative delivery through OH direct support to nonprofits that operate City-funded affordable housing; and
- Intentionality with respect to communities most negatively impacted by COVID-19, through direct engagement with community-based organizations, including agencies led by and serving BIPOC, immigrant, and refugee communities.

By the end of 2022, approximately $46.7 million in rental assistance had been paid out to 10,503 households. The three-program strategy ensured quick disbursal of federal funding in a streamlined yet equitable manner. Across community-based organizations, the United Way, and other OH partners, the majority of rental assistance recipients identified their race and/or ethnicity as other than white alone or Hispanic/Latinx.

INCOME-RESTRICTED UNITS IN MARKET-RATE MULTIFAMILY BUILDINGS

OH's affordable housing portfolio also includes income-restricted units in otherwise market-rate buildings. Two vehicles for restrictive housing covenants are described in this subsection.

Multifamily Tax Exemption Program (MFTE)

This program exempts multifamily building owners from property taxes on residential improvements in exchange for a set-aside of income-restricted units, generally for up to 12 years. In 2022, OH issued Final Certificates of Tax Exemption for 22 multifamily housing developments in neighborhoods throughout Seattle. Those multifamily properties total 3,738 rental units, of which 793 MFTE units are income-restricted, and 12 for-sale homes. Exemptions for properties with a Final Certificate issued in 2022 became effective on January 1, 2023.

OH's portfolio of in-service rental units includes over 6,000 MFTE units. Preliminary applications have been approved for another 1,900 MFTE rental units in permitting or under construction. City-funded low-income housing that is tax exempt through MFTE is not included in these totals.

Nearly 90% of in-service MFTE units either have zero or one bedroom. Publicly funded low-income housing using MFTE provides far higher shares of units sized for families with children compared to properties that are largely market-rate. For publicly funded low-income housing using MFTE, one-third of total rental units and roughly eight in ten owner-occupied homes have two or more bedrooms.[128]

Rents for two-thirds of units in OH's MFTE rental portfolio are capped at levels for households with incomes between 75% AMI ($72K for an individual to $92K for a three-person household) to 90% AMI ($86K for an individual to $111K for a three-person household). Fewer than five percent have rent limits affordable for households with incomes below 60% AMI ($58K for an individual or $74K for a 3-person household).[129]

Mandatory Housing Affordability (MHA)

MHA requires inclusion of a modest share of affordable homes in new multifamily and mixed-use development or a contribution to a City fund designated for preservation and production of low-income housing. MHA has been implemented in stages in Seattle, concurrent with area-wide zoning changes and Land Use Code modifications that increase development capacity.

Funds contributed through MHA payment option are awarded for production and preservation of income-restricted housing (both rental and ownership) by OH. Total MHA payments received by the City for projects with building permits issued as of December 31, 2022, total $246.1 million.[130] The

[128] Seattle Office of Housing, 2022 Annual MFTE Report, page 12.

[129] Seattle Office of Housing, 2022 Annual MFTE Report, page 14. Income limits are as published for fiscal year 2023.

[130] Seattle Office of Housing, 2022 Annual MHA/IZ Report, page 12.

MHA share of total City funding awarded annually for affordable rental and ownership housing is reflected in the first two subsections above.

In 2022, performance housing agreements were executed and recorded on the title of 14 properties. Once constructed, those properties will include 66 income-restricted units, three of which will be homes subject to limits on sale prices (including resales) that are affordable to buyer households with incomes no higher than 80% of AMI. Affordability limits for rental units depend on the apartment's square footage: 40% of AMI for those with net unit area of 400 square feet or less and 60% of AMI for those larger than 400 square feet. MHA performance units are generally subject to 75-year housing affordability covenants.

Funding and Funding Gaps for Production and Preservation of Income-Restricted Housing

This section presents the results of a recently completed analysis of future housing production conducted by OH to develop the proposal for the 2023 Seattle Housing Levy. We use this analysis to better understand to what extent City financing and available leverage funds can be used to meet Seattle's projected housing needs for households with incomes at or below 80% of AMI, including Permanent Supportive Housing (PSH), through 2044.

OH staff developed financial models to better understand costs associated with development of new income-restricted multifamily rental homes and permanently affordable for-sale homes. This analysis also provided cost modeling for reinvestment in Seattle's existing portfolio of City-funded income-restricted housing, as well as ongoing operating and maintenance needs, including operating, maintenance, and tenant services (OMS) needs for PSH residents.

Existing housing resources include the Seattle Housing Levy approved by voters in November of 2023, JumpStart/Payroll Expense Tax, Mandatory Housing Affordability (MHA), Federal funds, and funds typically leveraged from partner public funders. Affordable housing development requires layering of multiple fund sources for both capital and long-term operating costs.

OH invests in affordable housing to address the full continuum of needs, from homeownership to rental apartments to homelessness prevention. Due to statutory requirements, investment of public funding is limited to housing that serves households with incomes at or below 80% of AMI. A 2021 analysis of housing needs and supply indicates that "there are opportunities for the market to provide more housing that is affordable and available to households with incomes closer to 80% of AMI," but absent subsidies and other government action newly developed housing cannot be both profitable and affordable to households with incomes below 50% of AMI. Substantial public investment is needed to create housing for households with the lowest incomes.

To better understand the need for affordable housing in Seattle, OH reviewed several data sources including the King County GMPC Jurisdictional Housing Needs, which are described in the Housing Need Projections section of this Housing Appendix. In summary, as reflected in Figure A-34 within this appendix, the projections indicate approximately 112,000 net new homes will be needed between 2019 and 2044. Of the total 112,000 net new homes Seattle needs:

- approximately 63% needs to be affordable to households with incomes 0-80% of AMI;

- approximately 56% need to be affordable to households with incomes 0-50% of AMI; and
- nearly 40% need to be affordable to households with incomes 0-30% of AMI; (roughly a third of the need for new housing affordable at or below 30 percent of AMI is for PSH).

OH staff conducted an analysis of housing needs to inform the 2023 Seattle Housing Levy proposal. This analysis is based on the seven-year period that the newly adopted 2023 Seattle Housing Levy covers (2024-2030). OH staff annualized the GMPC's 2019-2044 projections by dividing by 25 and then multiplied by seven to estimate housing need over the seven-year levy period (2024-2030). Housing needs for 2031-2044 were also extrapolated using this same methodology.

Results of this analysis show it may be possible for OH, in coordination with all other public funding partners, to develop approximately 27% of the estimated need for the 2024-2030 period, for homes affordable to households with incomes at or below 80% AMI (roughly 5,350 units of the 19,803 units estimated to be needed in that time frame). Addressing that share of the estimated need will require leverage of all City affordable housing capital funds, including the 2023 Seattle Housing Levy. Other public capital sources that would need to be leveraged include Low Income Housing Tax Credits (LIHTC), State funding, and County funding, comprising about 55% of total project development budgets.

For the 2024-2030 Seattle Housing Levy period, it might be possible for OH, in coordination with its public funding partners, to fund approximately 15% of the OMS needs for PSH, as estimated by the GMPC. All available City OMS funds would need to leverage other public sources, including Housing Choice Vouchers as well as OMS funds at the federal, state, and county level.

Capital and OMS funding gaps would need to be filled to meet the total Jurisdictional Housing Needs as estimated by the State. To calculate this funding gap, staff assumed that local and leverage funds and development and operation costs would be similar to what was assumed for purposes of the 2023 Seattle Housing Levy modeling, plus a reasonable annual escalation of costs (3.2% for capital and 4% for OMS).

Substantial capital and OMS funding gaps remain to meet the total state Jurisdictional housing needs through 2044 for households with incomes at or below 80% of AMI. The estimated gap totals $30.4 billion ($27.7 billion for capital costs and $2.7 billion for PSH OMS costs).

To work toward closing this gap, the City must continue to advocate for significant expansion of the federal LIHTC program and new and/or increased federal and state fund sources for capital and OMS costs of production and preservation of low-income housing, including PSH.

Other Barriers to Increasing Supply of Income-Restricted Homes

This section describes how income-restricted housing production is especially sensitive to barriers and describes additional challenges involved in the production and operation of permanently supportive housing.

BARRIERS TO LOW-INCOME HOUSING DEVELOPMENT

Income-restricted housing is especially sensitive to regulations that add cost and complexity to producing housing. This is because affordability requirements limit the amount of income a project

will be able to generate from residents' payments, and because assembling funding and development sites for income-restricted housing is already particularly complicated.

PSRC conducted outreach with developers of affordable housing to identify barriers that make it particularly challenging to produce housing able to accommodate needs of low- and moderate-income households.[131] The developers identified zoning as the biggest barrier that local jurisdictions have direct ability to change. When asked to identify the zoning characteristics most desired for sites on which to build affordable units, developers indicated zoning for moderate density residential, followed by zoning for high-density[132] residential, density bonuses for affordable units, and reduced parking requirements. Respondents noted several types of standards, including requirements for ground-floor commercial space, open space, and parking minimums, that can reduce the feasibility of affordable housing projects. In addition, developers indicated that reducing fees, expediting permitting processes, and relaxing Design Review requirements for development of affordable housing can make more projects more viable.

The City made strides in reducing barriers to production of affordable housing with adoption in 2023 of Ordinance 126855, which focuses on publicly funded low-income housing and code-incentivized income-restricted units. The ordinance exempted all low-income rent-restricted housing and sale and resale-restricted homes from Design Review and authorized the ability to request waivers or modification of certain development standards for these housing projects (as long as these departures do not increase building envelopes).[133] The ordinance also consolidated and simplified parts of the land use code focusing on income-restricted housing development.

Changes to State law in 2018 created flexibility for cities and other public entities to donate surplus land for permanently affordable housing uses rather than having to obtain fair market value with property transfers. Seattle has established affordable housing as a priority for disposition of City-owned property and is using the recently provided flexibility to reduce barriers to affordable housing associated with land costs.[134]

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[131] PSRC published their findings to help jurisdictions better understand the constraints and opportunities these developers experience. See VISION 2050 Planning Resources: Findings from Affordable Housing Developer Outreach, July 2023.

[132] Definitions of "moderate density" and "high density" were not included in the questionnaire.

[133] Prior to adoption of https://seattle.legistar.com/LegislationDetail.aspx?ID=6249076&GUID=DE1491A3-26AC-4B19-AB1D-B29636D81600&Options=ID|Text|&Search=low-income the ordinance, those provisions were available on a temporary basis to housing with at least a 40% share of total units affordable for households with incomes no higher than 60% of AMI.

[134] As noted in Seattle's successful Pro Housing grant application to HUD, of November 2023, Seattle transferred or is in the process of transferring 17 City-owned parcels to support production of more than 800 income-restricted housing units.

Even with these changes, regulatory barriers in Seattle have continued to hamper the development of comparatively low-cost forms of housing. This is particularly the case in neighborhoods with low-density zoning, where constraints on the production of housing diversity and affordability have continued a history of racial exclusion.

City-funded affordable housing developments typically comprise about 20 homes for homeownership and, for rental, 85-125 apartments in five floors of wood frame construction over a one- or two-floor concrete podium. Approximately 10 percent of developable land in Seattle is zoned for the multifamily construction densities of five to eight stories that are most cost-effective for production of income-restricted homes. The share of zoned land that works for new midrise developments is even smaller, given that many of these sites are already developed or require lot assembly. Competition with market-rate developers for suitably zoned sites exacerbates challenges for developers of income-restricted housing. Private market developers commonly assemble development sites by taking on debt or private investors and speculators hold land until they reach their investment goals. Land banking and site assembly tend to be more difficult for income-restricted housing developers due to limited funding availability, financing structures, and timing.

Actions to expand the area zoned for higher density housing development, particularly in the 5 to 8 story range, which are documented in a previous section, can also help to address barriers to increasing production of rent- and income-restricted homes.

BARRIERS TO PERMANENT SUPPORTIVE HOUSING (PSH) DEVELOPMENT

In response to a pandemic-fueled rise in homelessness, including individuals and families living unsheltered, Seattle City Council adopted Ordinance 126287 in 2021. The ordinance provides flexibility to reduce the cost and increase the feasibility of developing and operating PSH. Specifically, Design Review is no longer required for PSH, and SDCI is authorized to approve requests from organizations developing PSH for waiver or modification of certain development standards like parking, overhead weather protection, indoor amenity areas, outdoor open space, ground-floor uses, and facades limits.

PSRC's outreach to affordable housing developers found that public opposition can play a significant role in delaying the development of housing to serve formerly homeless people and others in need of PSH. While Seattle has a requirement for a community relations plan with new PSH development, heightened engagement can result in public opposition that can derail new PSH projects.

Finally, in most of Seattle, the City's Housing Funding Policies currently limit siting of low-income housing for households with incomes at or below 30% of AMI (e.g., PSH) to no more than 20% of total housing units in any Census block group. This requirement can have the unintended consequence of restricting potential development sites of PSH to a small fraction of zoning for residential development citywide.

COMMUNITY PARTNERSHIPS FOR PRODUCING AND OPERATING INCOME-RESTRICTED HOUSING

Applicants for OH funding to support affordable rental apartments and for-sale homes must demonstrate ability and commitment to develop, own, and manage housing and state their housing mission in organizational documents. OH evaluates each applicant to determine that the applicant has sufficient capacity to sustainably develop, own and operate housing on a long-term basis.

OH has a number of policies and programs to expand its partnerships with communities that might lack direct experience in those areas. OH's Housing Funding Policies allow applicants to demonstrate capacity by partnering with an entity or entities that provide essential expertise to the proposed project. In addition, OH oversees the Community Self-Determination Fund (CSDF) which provides short-term or permanent funding to community-based organizations for strategic property acquisition, development, and preservation of low-income housing. An additional element of the CSDF is the Community-Based Organization (CBO) Capacity and Grant Program, which sets aside funds for a third-party to provide technical assistance and capacity support for CBOs and new developers. PSH presents unique partnership needs since the housing first model generally includes case management, mental health, health care, and chemical dependency services to support the physical, emotional, and financial well-being of residents.

PSH staff play a critical role in meeting resident needs and thereby supporting the capital investments made by OH. However, PSH organizations experience a high volume of staff vacancies due to low wages and challenging working conditions. The PSH OMS Workforce Stabilization fund invests in the City's PSH portfolio to ensure that the most vulnerable remain housed and adequately supported, and that those working with them have sustainable wages and working conditions.

OH has also established effective partnerships with housing counselors, other City departments, and King County to determine how and when to appropriately intervene with financial or other assistance to assist low-income homeowners successfully remain in their homes.

Homelessness

Seattle has established a goal in the Housing element to make instances of homelessness rare and brief. To achieve this goal, there is a significant need for emergency housing and shelters. The King County Countywide Planning Policies estimate that Seattle will need to accommodate a total of 25,734 emergency shelter beds by 2044, a five-fold increase of 21,401 beds over the 4,333 beds in the city as of the end of 2019. These beds are critical to reducing and preventing street homelessness in Seattle, which has grown in prevalence, in particular during the COVID-19 pandemic.

In addition, permanent housing opportunities that are available to people experiencing homelessness, such as permanent supportive housing (PSH), are critical, both in Seattle and in the larger region, to reducing homelessness and reducing the future need for emergency housing.[135]

Populations Experiencing Homelessness in King County

Seattle coordinates its local homelessness system with King County and its other cities, as part of the unified countywide system called the King County Regional Homelessness Authority (KCRHA). KCHRA estimated that a total of 52,000 people throughout King County experienced homelessness at some point in 2022, and the number experiencing homelessness is projected to grow to nearly 62,000 by 2028.[136] People can experience homelessness for various lengths of time, depending on the ability of the homelessness system to meet their needs, and their own ability to gain and maintain permanent housing.

This section describes the population experiencing homelessness at a given point in time. The Washington State Department of Commerce publishes January and July estimates of people experiencing homelessness in its biannual "Snapshot of Homelessness in Washington State" report.[137] These estimates are produced by combining a variety of data sources, such as Medicaid

[135] Guidance for Updating Your Housing Element pg. 49. Washington State Department of Commerce, August 2023.

[136] King County Regional Homelessness Authority Update, March 2023.

[137] The snapshot tallies we include here in the Housing Appendix refer to the population who are experiencing homelessness, which include both those in emergency shelter and those who are unsheltered. (The snapshots also include broader tallies, not included in this Housing Appendix, encompassing persons who are unstably housed in addition to persons experiencing homelessness.) These snapshots are prepared by the Washington State Department of Social and Health Services (DSHS) Research and Data Analysis Division for Commerce and are published on the Homeless System Performance section of Commerce's website.

claims, Temporary Assistance for Needy Families (TANF), Basic Food Assistance, and Homelessness Management Information Systems.[138]

Figure A-116 shows Commerce's Snapshot estimates for people experiencing homelessness in King County as of July 2022. These estimates are grouped by the type of household in which each of these persons is a member. The Snapshot tallied 33,652 people experiencing homelessness in the county in July 2022. Of these, 22,120 were members of adult-only households, 9,411 were members of households with an adult 25 years or older with one or more minor (person under 18), and 2,082 were members of households where everyone was 24 years or younger.

The largest number of people experiencing homelessness by race are in white and Black racial groups. However, the Black population is overrepresented as a proportion of the population experiencing homelessness when compared to their overall countywide population. In addition, the Black population is the largest group of households with minors experiencing homelessness. American Indian or Alaska Native, the Native Hawaiian or Pacific Islander, and the Hispanic or Latino racial and ethnic groups are also overrepresented as a proportion of the population experiencing homeless when compared to their overall countywide population. This is consistent with other data showing racial disparities in housing and income that are documented in this appendix.

[138] For a fuller understanding of the data contributing to the Snapshots and the limitations of the Snapshots, view "Measuring Homelessness Using Administrative Data: A Review of the Snapshot of Homelessness," DSHS Research and Data Analysis Division, October 2022; and "Understanding the Snapshot Report." Commerce Housing Division Data and Performance Unit, November 2022.

Figure A-115
King County Population Experiencing Homelessness
By Household Type, Race and Ethnicity, Sheltered or Unsheltered, July 2022

Race and Ethnicity	Persons in Youth or Young Adult Household, All Members 24 or Younger	Persons in Adult-Only Households with at Least One Member 25 or Older	Persons in Households with One or More Adults 25 or Older and One or More Minors	Persons in Unknown Household Type	**Total Population Experiencing Homelessness**
American Indian or Alaska Native	216	2,564	887	<11	**3,669 (10.9%)**
Asian	160	1,347	685	-	**2,191 (6.5%)**
Black or African American	881	6,906	4,180	17	**11,984 (35.6%)**
Hispanic or Latino	392	2,589	z1,808	<11	**4,791 (14.2%)**
Native Hawaiian or Pacific Islander	153	1,164	934	<11	**2,252 (6.7%)**
White	547	9,696	1,993	16	**12,251 (36.4%)**
Unknown	108	510	714	<11	**1,334 (4.0%)**
Total	**2,082 (6.2%)**	**22,120 (65.7%)**	**9,411 (28.0%)**	**39 (0.1%)**	**33,652 (100%)**

Source: Snapshot of Homelessness in Washington for July 2022, Washington State Department of Commerce.
Note: Based on combined Medicaid, Economic Service, and HMIS populations Includes service recipients and all associated household members.

Figure A-117 shows racial and ethnic composition of the overall population in King County as reported in the Census Bureau's American Community Survey (ACS) alongside that of the population experiencing homelessness as reported in Commerce's Snapshot of Homelessness. Because Commerce does not report multiracial categories, its estimates are not strictly comparable to the ACS. The disproportionalities in rates of homelessness are so large that they are evident even when considering the differences between the data sources in tabulating race and ethnicity.

Figure A-116
Racial and Ethnic Distribution:
Population Experiencing Homelessness and Overall Population in King County

Snapshot of Homelessness Tallies of Population in Experiencing Homelessness		American Community Survey (ACS) Estimates for Total King County Population	
Race and Ethnicity	Percent of Population Experiencing Homelessness (July 2022)	Race and Ethnicity	Percent of Population (2021 ACS)
Total:	100.0%	Total:	100.0%
American Indian or Alaska Native	10.9%	American Indian and Alaska Native alone, not Hispanic	0.5%
Asian	6.5%	Asian alone, not Hispanic	20.0%
Black or African American	35.6%	Black or African American alone, not Hispanic	6.6%
Native Hawaiian or Pacific Islander	6.7%	Native Hawaiian and Other Pacific Islander alone, not Hispanic	0.9%
White	36.4%	White alone, not Hispanic	54.6%
		Some other race alone, not Hispanic	0.6%
		Two or more races, not Hispanic	6.8%
Hispanic or Latino ethnicity	14.2%	Hispanic or Latino ethnicity (any race or race combinations)	10.8%
Unknown	4.0%		
Sources: Snapshot of Homelessness in Washington for July 2022, Washington State Department of Commerce; 2020 decennial census, U.S. Census Bureau.			

POINT-IN-TIME ESTIMATES

An additional source of data for estimating the population experiencing homelessness is the Point-in-Time Count. The Point-In-Time Count is a survey count of people experiencing homelessness. It is conducted one night each January at locations in Seattle and elsewhere in King County. The survey is used to identify the extent and nature of homelessness.

The One Night Count has two components: a count of unsheltered homeless, which was conducted by the Seattle/King County Continuum of Care until 2020 and by the King County Regional Homelessness Authority thereafter, and a count (by agency staff) of people being served that same night in emergency shelters and transitional housing programs. Agency staff also provide information about those people being served. As Point-In-Time counting does not occur everywhere and not all people experiencing homelessness prefer to be counted, the Point-in-Time count represents a limited sample of people experiencing homelessness in Seattle and King County.

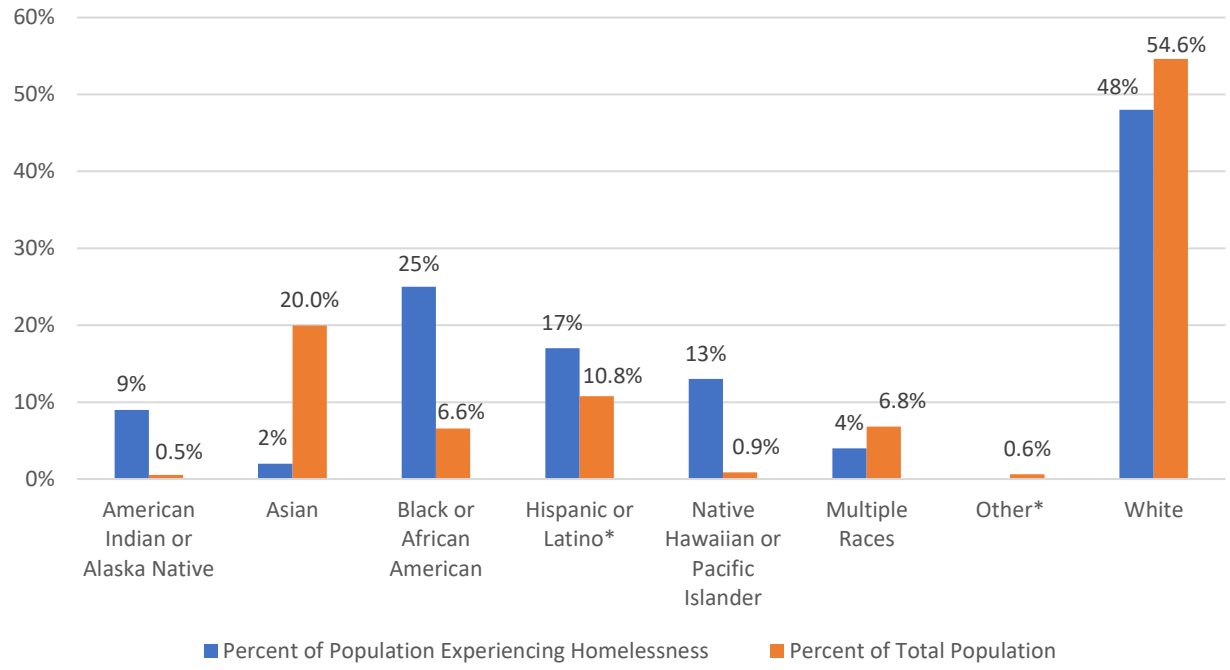
The 2022 Point-in-Time Count counted 13,368 people experiencing homelessness that night in January in King County, with 57 percent of those being unsheltered and 43 percent sheltered. Sheltered spaces surveyed include family transitional housing, congregate and non-congregate emergency shelters, and tiny house villages. Unsheltered people included those who were in both

sanctioned and unsanctioned encampments with tents; and people located somewhere outside on the street, located in an abandoned building, or living in a vehicle.

Of those surveyed in 2022, 51 percent identified themselves as having a disability, 31 percent identified themselves as having a mental health disorder, and 37 percent identified themselves as having a substance use disorder.

Race and ethnicity estimates from the 2022 Point-In-Time survey shown in Figure A-118 reveal that several groups are overrepresented in the population experiencing homelessness, similar to patterns seen in Commerce's "Snapshot of Homelessness." Black, Native Hawaiian or Pacific Islander, American Indian or Alaska Native, and Hispanic or Latino groups are all overrepresented in the population experiencing homelessness. Native Hawaiian or Pacific Islanders were 13 times more prevalent among the population experiencing homelessness than in the overall King County population.

Figure A-117
2022 Point in Time Count by Race and Ethnicity



Source: 2022 Point in Time Count for King County, King County Regional Homelessness Authority; U.S. Census Bureau 2020 decennial census
Note: King County 2022 Point-in-Time Count did not include data for people who identify as Other race

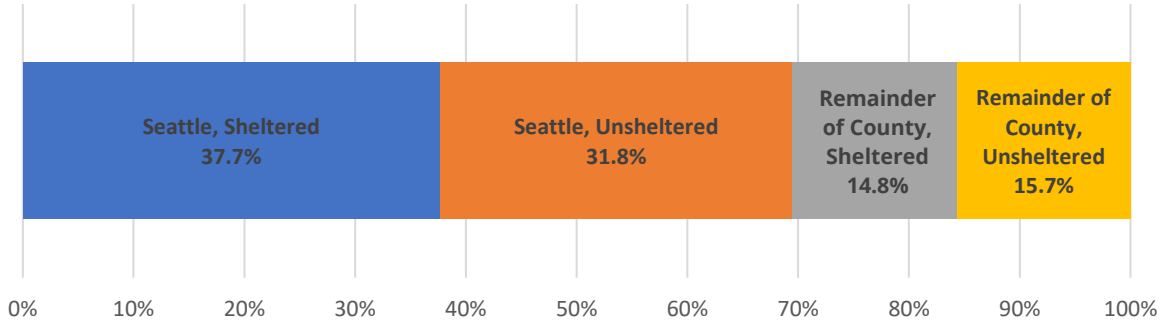
Comparing overall results between 2020 and 2022 allows for some insights into how homelessness has changed over time. In the January 2020 count, 47.5 percent of the overall 11,751 people experiencing homelessness were unsheltered while 52.5 percent were sheltered. Thus, there has been an increase of 10 percentage points in the share of unsheltered people between 2020 and 2022, which occurred as the number of people experiencing homelessness overall increased.

Furthermore, the 2020 Point-In-Time Count report provides details not available in the 2022 count, such as the location of people experiencing homelessness in King County. Figure A-119 shows 69.5 percent of King County's people experiencing homelessness were found in Seattle as of the Point-in-Time Count in 2020. Of those in Seattle, a little more than half were sheltered.

Other key survey findings from the Point-In-Time 2020 count for King County include the following:

- Twenty-nine percent of people experiencing homelessness were considered chronically homeless, meaning they had spent more than 1 year experiencing homelessness or had experienced homelessness on four separate occasions in the last 3 years.
- People in families with children make up nearly one-third of people experiencing homelessness. Additional large demographic groups included single adult men and veterans.
- Reporting on issues such as disabilities and health conditions is voluntary. The most commonly reported disabilities and health conditions reported were mental illness, alcohol or substance abuse, and physical disability.
- In addition, self-reported reasons for experiencing homelessness most commonly included job loss, substance use, mental health issues, and not being able to afford a rent increase.

Figure A-118
2020 Point in Time Count by Location



Source: 2020 Point in Time Count for Seattle and King County

Existing Emergency Shelter and Housing for People Experiencing Homelessness

Figure A-34 at the beginning of this Housing Appendix shows that Seattle had 4,333 shelter beds as of 2019. To describe existing shelter beds by type (i.e., family, adult or veteran beds) across Seattle and King County, we present data that is reported at the countywide level throughout the remainder of this section, Figure A-120 shows the existing emergency shelter and housing supply by type for people experiencing homelessness across King County.

As of 2023, there are a total of 5,344 emergency shelter beds situated in King County. About 55 percent of these beds are for adults without children, while 45 percent allow for adults with children. In addition, small shares of these beds are for specific populations, including victims of domestic violence, people living with HIV, veterans, and youth between the ages of 18 and 24.

Transitional housing, which is limited in length of stay typically to 2 years, provides an additional 1,900 beds, mostly for households with children.

Forms of permanent housing include rapid rehousing, permanent supportive housing, and other permanent housing. Rapid rehousing is the smallest of these three categories, with 1,200 bed equivalents that serve households who are placed in permanent housing quickly through financial and housing support. Permanent supportive housing is the second largest of the groups, with 7,400 beds, while other permanent housing, which does not include supportive services typical of PSH, provides 4,100 beds. There are approximately 1,900 veteran PSH beds, the largest permanent housing supply for any specific population.

It is worth noting that beds serving victims of domestic violence, people living with HIV, veterans, and youth under the age of 25 vary in whether they also allow adults with accompanying children. Beds serving victims of domestic violence almost entirely allow adults with children, while beds serving people living with HIV do not. About a third of beds serving veterans and youth also allow adults with children.

Figure A-119
Supply of Beds by Population and Shelter/Housing Type in King County, 2023

Supply of Beds by Population and Shelter/Housing Type in King County, 2023					
Bed Type	Emergency Shelter	Transitional Housing	Permanent Housing		
			Rapid Rehousing	Permanent Supportive Housing*	Other Permanent Housing
Total Beds	5,344	1,895	1,247	7,416	4,057
Beds by Household Status					
Adults Only	2,928	33	113	5,309	2,003
Allow Adults with Children	2,416	1,862	1,134	2,107	2,054
Beds for Specific Populations					
Victims of Domestic Violence	169	295	243	-	18
Living with HIV	26	-	-	58	-
Veterans	34	-	178	1,936	59
Youth Aged 18 to 24	147	226	156	80	70
*Includes Supportive Housing and Permanent Supportive Housing, although most are Permanent Supportive Housing Source: King County Regional Homelessness Authority, 2023 Housing Inventory Count for King County					

Emergency Housing and Shelter Capacity

As described in the Growth Targets and Housing Needs Projections section of this appendix, pursuant to recent changes to state GMA requirements, the GMPC adopted housing needs

projections for emergency housing for each city in King County. The GMA also requires that local comprehensive plans document that existing zoned capacity can accommodate those emergency housing needs.

Seattle's analysis of capacity to meet emergency housing needs is summarized in this section. We use the development capacity model along with the analytical steps shown below that reflect guidance provided by the State Department of Commerce. The steps for this analysis are as follows:

1. Identify the zones where emergency housing is allowed
2. Using recent examples, create density assumptions for shelter types
3. Identify sites to only properties suitable for emergency housing types in zones where they are allowed and calculate their capacity for emergency housing,
4. Compare the development capacity to the projected emergency housing need.

IDENTIFY THE ZONES WHERE EMERGENCY HOUSING IS ALLOWED

The City of Seattle has several permitted uses that allow for indoor emergency housing in permanent structures, including community centers, communal housing, congregate residences, and hotel uses. As one or more of these uses are allowed by-right across most zones, these are largely allowed in many areas of the city. The exception is within neighborhood residential zones, where indoor emergency housing is allowed as a conditional use.

In addition, tiny house communities, which provide a bed in temporary structures, are allowed in all zones if on a religious-affiliated property and any development site as an interim use once a permit has been issued.

DENSITY ASSUMPTIONS FOR SHELTER TYPES

To create density assumptions and filter our search for sites in Seattle that carry Emergency Housing and Shelter capacity, we start by looking at recent examples of shelters built across Seattle. Figure A-121 shows three shelter types that may be expected across Seattle and identifies property characteristics and shelter characteristics for examples of each shelter type. These shelter types are as follows:

- **Indoor emergency shelters in new buildings** are in purpose-built structures, or portions of them, that were purpose-built for emergency housing.
- **Indoor emergency shelters in converted buildings** are in permanent structures formerly occupied by another use, like an office or assisted living facility.
- **Tiny house villages** are sites with multiple temporary structures used for shelter beds, hygiene, cooking, security, and service facilities.

Figure A-120
Examples of Indoor Emergency Shelter and Tiny House Village Projects in Seattle

Project Name	Property Characteristics				Shelter Characteristics		
	Description	Zoning	Site square feet	Building square feet	Beds	Shelter square feet*	Density (Beds per shelter sf)
Indoor Emergency Shelter in New Buildings							
Mary's Place in the Regrade	Portion of new office tower	DMC 340 /290-440	83,422	80,460	190	37,985	200 sf/bed
Blaine Veterans Center	Ground-floor shelter with parking above	NC3-65	14,160	64,630	36	7,990	222 sf/bed
Indoor Emergency Shelter in Converted Buildings							
Seattle Mennonite Church	Church owned office	NC3P-95	19,223	6,877	20	6,877	334 sf/bed
ROOTS Shelter	Former Fraternity	LR3	8,640	18,196	45	9,938	221 sf/bed
Tiny House Villages							
LIHI Henderson	Transitional Encampment	NC3-55; NC3P-55	21,794	0	42	21,794	519 sf/bed
Pallet Shelter	Transitional Encampment	NC3-75	31,800	0	40	31,800	695 sf/bed

Source: City of Seattle Department of Construction and Inspections; King County Assessor
*Shelter square feet for Tiny House Villages is the development site square feet. For Indoor Emergency Shelters, it's the building or portion of the building the shelter occupies.

Figure A-121 helps to create assumed shelter densities shown in Figure A-122. We further consulted with City staff who work closely with emergency shelter providers to create appropriate assumed site aspects.

The City of Seattle has no regulations that universally limit the occupancy, spacing, or intensity of emergency housing beyond those applicable to other uses as a whole; therefore, we do not assume site aspects based on these limitations that frequently limit emergency housing across other jurisdictions.

Indoor Emergency Housing in New Buildings
We assume that Commercial, Neighborhood Commercial, Downtown, Lowrise and Seattle Mixed Use zones carry indoor emergency shelter capacity, as these allow shelter uses by-right. We do not assume shelter capacity in Neighborhood Residential and Residential Small Lot zones, where

emergency shelter uses are conditional, in Industrial zones, which may not be appropriate for indoor emergency housing, nor in Master Planned Communities or Major Institutional Overlays, which have existing institutional plans.

Recognizing that shelters in new buildings may be one use in a mixed-use development, we create density assumptions based on total site developable square feet. Mary's Place has 1 bed per 439 square feet of developable land area in the redeveloped Amazon block, and Blaine Veteran's Center has 1 bed per 393 square feet. As a midpoint, we assume 415 site sf per bed would be required for shelters in new structures.

In addition, we assume only vacant or redevelopable sites with housing capacity also carry indoor emergency housing capacity. While we provide a full description of how we identify these sites in the Development Capacity section of this housing appendix, it is important to note that sites unlikely to fully redevelop are not included in the new building capacity (i.e., those that are fully developed, on parks or cemeteries, or on major institutional properties).

Indoor Emergency Housing in Converted Buildings

Sites with existing buildings may be preferred to be used as conversions due to the high cost and timing of new development. In consultation with colleagues, we found that there are three types of partial or whole building use conversions that occur in Seattle:

1. Most common—religious property conversions
2. Less frequent—publicly owned and/or properties marked for demolition
3. Very infrequent—existing commercial spaces

The Seattle Mennonite Church project described in Figure A-121 is an example of the first conversion type, and the ROOTS shelter is an example of the second. In estimating capacity for potential conversions to indoor emergency housing, we include only religious property conversions given that they are the most common form of conversion. In addition, we assume that no more than a quarter of the building envelope would be dedicated to shelter uses, as the remaining space may be required by remaining operations. We assume that shelter in building conversions range between 20 and 50 beds per site with each bed requiring 275 feet of building space, as in the example shelters.

Tiny House Villages

We include both tiny house villages on interim-use sites, which are those sites where a master use permit for a new building (usually housing) has been issued, and tiny house villages on religious sites, which are not dependent on future development activities. Tiny house villages on religious sites also have less stringent state and local requirements than those on interim-use sites, such as SEPA and permitting requirements. Tiny house villages as an interim use are further limited to a maximum of 40 villages within Seattle at any given time.

For tiny house villages on religious sites, we assume existing religious site control and do not include sites that carry indoor residential capacity. We also assume that these villages may be placed on the

remaining developable land area on religious sites, excluding the portions of religious sites where current buildings exist.

Staff experience tells us that tiny house village providers typically look for properties with a minimum space for 40 tiny houses, which allows for services to be provided on-site in a cost-effective manner. Given the two examples provided in Figure A-121, we assume one tiny home per 550 square feet of site developable area, and just 1 bed per tiny house, although some providers may allow more.

Figure A-121
Assumptions by Indoor Emergency Housing and Village Types

Emergency Housing or Village by Type	Assumed Site Aspects	Assumed Shelter Density
Indoor emergency housing in new buildings	Vacant or Redevelopable sites in zones where emergency shelter uses are allowed by-right**	1 bed per 415 sf of developable area
Indoor emergency shelter in converted buildings	Up to ¼ of floor area in existing religious buildings, with a minimum 20 to maximum 50-bed range per property	1 bed per 275 sf of building area
Tiny house villages on religious properties	Existing site control by a religious institution with a minimum space for 40 tiny houses*	1 bed per 550 sf of developable area
Tiny house villages as an interim use	Any vacant or Redevelopable site with a minimum space for 40 tiny houses*	1 bed per 550 sf of developable area
No shelter capacity assumed	Sites in zones where emergency shelter uses are conditionally allowed or unlikely, and not controlled by a religious institution**	No beds assumed

Source: Seattle Office of Planning and Community Development
*A minimum of 22,000 square feet of developable land area. Developable land area is site area, less any environmentally critical areas or otherwise restricted portions.

**We assume emergency housing capacity across Commercial, Neighborhood Commercial, Downtown (incl. Pioneer Square, Pike Place Market, and International District), Lowrise, and Seattle Mixed Use zone categories. We do not assume emergency housing or shelter capacity in Neighborhood Residential, Residential Small Lot, Industrial, Master Planned Community zone categories or in Major Institutional Overlays.

IDENTIFY SITES AND CALCULATE THEIR CAPACITY FOR EMERGENCY HOUSING

The next step is identifying those sites that may hold emergency housing capacity based on the assumed site aspects in Figure A-122 and calculating their potential capacity using the density assumptions in the same table. The results are shown in Figure A-123.

To identify sites, we use output from Seattle's Development Capacity Model. Background on this model is included in the Zoned Development Capacity section of this Housing Appendix. We use vacant and redevelopable sites with housing capacity to calculate capacity for indoor emergency shelters in new buildings. In addition, we use vacant sites to identify sites where Seattle may temporarily accommodate tiny house villages as an interim use which typically move every 3 to 4

years as permanent structures are built. We identify religious properties for both conversions and tiny house villages by looking at existing land use identified by the Assessor, and filtering the search for each type using site aspects mentioned in Figure A-122.

In all cases, we exclude sites and portions of sites that are environmentally encumbered, or that otherwise do not have emergency housing development capacity. This step involves also identifying and excluding sites that are known to have indoor emergency housing.

Figure A-122
Emergency Housing Development Capacity by Shelter Type

Shelter Types	Land or Convertible Building Area	Emergency Housing Capacity (Beds / % of Beds)	
Indoor Emergency Shelter in New Buildings	2,014 acres	211,429	94.6%
Indoor Emergency Shelter in Converted Buildings	626,209 sf.	2,277	1.0%
Tiny House Villages on Religious Property	73 acres	5,795	2.6%
Tiny House Villages as an Interim Use	n/a*	4,000*	1.8%
Total	**-**	**223,502**	**100%**

Source: Seattle Office of Planning and Community Development; Development Capacity Model, Sept. 2022
*There are a maximum of 4,000 beds, or 100 beds across 40 interim use sites at any given time. There were 166 vacant sites with land area sufficient for 100 beds at the time of this development capacity model. This number changes as sites undergo new development activities and when buildings on future development sites are demolished.

COMPARE DEVELOPMENT CAPACITY TO THE EMERGENCY HOUSING NEED

In total, we estimate that Seattle has zoned capacity for 213,707 indoor emergency housing beds in Seattle across both potential new buildings and building conversions. Figure A-124 compares these capacity beds to the emergency housing needs. Seattle's existing zoned capacity for indoor emergency housing is not, in itself, a barrier to meeting our indoor emergency housing needs.

We also have estimated zoned capacity for 9,795 tiny house villages beds on existing religious properties and as interim uses. Capacity for tiny house villages alone would not meet the projected needs of 21,401 additional emergency housing beds required by 2044. Tiny house villages additionally do not meet the standard for indoor emergency housing beds, which are in permanent structures that meet residential building standards.

Despite having a significantly higher zoned development capacity for indoor emergency housing than the projected need, there are significant barriers to increasing the number of emergency housing beds in Seattle relative to the projected needs. We discuss barriers and gaps, and actions for addressing these emergency housing needs, in the following section.

Figure A-123
Emergency Housing Development Capacity and Projected Housing Needs

Shelter Type	Emergency Housing Capacity	Total Emergency Housing Capacity	Projected Need (Beds)	Surplus Capacity (Beds / % of Beds)
Indoor Emergency Housing	213,707	223,502	21,401	**+202,101; 944%**
Tiny House Villages	9,795			
Source: Seattle Office of Planning & Community Development				

Emergency Housing Production Barriers and Actions

This section highlights key barriers to producing emergency housing in Seattle and outlines potential actions the City could take to address these challenges. This section addresses new GMA requirements, guidance from the state Department of Commerce, and countywide policies.

There are two primary forms of emergency housing in Seattle: indoor emergency housing in permanent structures and emergency shelters in temporary structures.[139]

- Indoor emergency housing often involves converting existing buildings to a shelter use, such as religious properties converted to a congregate dormitory or former assisted living facilities with non-congregate sleeping rooms. Permanent structures newly developed for emergency housing uses are less common in Seattle than are conversions.
- In contrast to permanent structures, temporary structures like tiny houses have become the main form of new emergency shelter beds in recent years. This is largely due to the cost effectiveness and speed at which emergency shelter providers can open communities containing these structures. The Seattle Municipal Code considers tiny house villages to be a form of "transitional encampment," which can either be on a religious sponsored site or on a redevelopment site as an interim use.

The following discussion addresses regulatory and process barriers, funding challenges, and partnership gaps that make developing and operating emergency housing challenging. Barriers were identified by City staff in the Seattle Department of Construction and Inspections and the Human Services Department who regularly engage with emergency housing providers and work in interorganizational partnerships for emergency housing.

[139] Local examples of both forms of emergency housing can be found in the preceding section on Emergency Housing and Shelter Capacity.

DEVELOPMENT REGULATIONS

Currently, the City has no on-site parking, recreation, or open space requirements for indoor emergency housing or tiny house villages. Indoor emergency housing in new permanent buildings is not subject to special development requirements (e.g., spacing, occupancy, intensity) beyond that of other residential types.

Tiny house communities, which are regulated as a form of transitional encampment, are subject to some special development requirements. For instance, interim use tiny house communities can have a maximum of 100 occupants. City of Seattle removed many limitations on these communities in 2020 by adopting Ordinance 126042[140], which included:

- Increasing the maximum number of interim use communities from three to forty. Religious sponsored encampments are not included in this cap.
- Creating a new provision for the half-mile spacing requirement for interim use communities. The new provision included that when at least one interim use encampment exists in each Council District, then the spacing requirement is no longer enforceable. This condition has been met with the increase in tiny house villages following the legislation.
- Removing the requirement that the transitional encampment be accessory to an existing principal use for transitional encampments on religious sites.

PROCESS OBSTACLES

City of Seattle staff work closely with emergency housing providers to ensure their emergency shelter projects are compliant with state and local regulations, and that providers can open their facilities in a timely manner. The Mayor's Proclamation of Civil Emergency early during the COVID-19 pandemic allowed for various forms of indoor emergency shelter and tiny house communities to rapidly be set up across Seattle without any permits (except trade permits, i.e. - electrical, plumbing).

Tiny house communities on religious organizations' property are broadly exempted from obtaining a land use permit, while a Master Use permit continues to be required for tiny home villages on other properties. While many tiny house communities do not require a full State Environmental Policy Act (SEPA) review, those emergency housing and tiny home community projects which do (in particular, those greater than 12,000 sf. without religious affiliation) can face several months of delay. This delay, and the costs associated with it, can lead organizations to abandon their project or consider lower-cost shelter sites. SEPA appeals brought by parties opposed to the establishment of tiny house communities can lead to especially long delays or halt projects entirely.

[140] Ordinance 12604 and materials describing its provisions can be viewed in the City's Legislation Information Center.

CAPITAL COSTS, OPERATION COSTS AND AVAILABLE FUNDING

High capital and operating costs, coupled with limited funding, are the biggest barriers to developing emergency housing. This funding gap is also a primary reason why shelter providers have increasingly turned to tiny home communities instead of indoor emergency housing when creating new shelters.

Costs

Establishing emergency housing in Seattle involves significant costs, both in terms of capital and ongoing shelter operations. Where appropriate, the City has sought to decrease capital costs by providing land at no cost for tiny house villages. However, with few City-owned properties appropriate for additional villages, some providers have turned to setting up tiny house villages on privately owned properties where they are charged market-rate land rents. In addition, villages are transitional uses, requiring costly site preparations and relocations as often as every three to five years. Moves also require significant provider and City staff time for coordination, siting, design, and permitting.

In contrast, indoor emergency housing involves higher costs for rents or upfront property acquisition. Master leased shelter buildings typically require a more expensive building rent and maintenance fees, therefore costing more per bed to operate annually than tiny house villages. Full property purchases for indoor emergency housing require much greater capital resources upfront, especially if a future shelter site requires development activities. However, purchasing a property results in long-term asset ownership associated with lower annual operating costs (as there are no rent costs) and reduces the likelihood of needing to relocate in the future.

Indoor emergency shelters planned for converted buildings sometimes face costly building improvements to ensure safety of shelter clients. Shelter spaces planned for areas not on the ground floor or on floors directly adjacent to the ground floor require more stringent fire suppression systems, i.e., sprinkler systems. The overall cost of upgrading safety features in existing buildings can make potential indoor emergency shelter projects financially infeasible. Given these potentially costly upgrades, a Draft Director's Rule that aims to ensure fire safety while providing flexibility was created to help make conversion projects more financially feasible. This Draft Director's Rule scales development requirements for sprinklers in conversions based on the hours of operations and intensity of the shelter. Given the safety tradeoff by deviating from standard code requirements, providers who seek to deviate are required to have specific maximum capacities and a 24-hour staffing plan to ensure client safety. Still, other types of significant safety upgrades to properties – such as reinforcing unreinforced masonry buildings – are not touched by this Draft Director's Rule and are necessary to meet residential requirements.

Funding Availability

Seattle primarily relies on local sources of funds for emergency shelters, with limited sources of funds from the State and federal governments. Unlike permanent housing projects, which can leverage local investments to win Low-Income Housing Tax Credit (LIHTC) dollars or win additional state funding, emergency housing lacks similar outside funding opportunities. The result is that local governments like Seattle are the main providers of dollars for producing new emergency housing beds.

COVID-19 response efforts brought in critical one-time funding that allowed acquiring properties such as closed rehabilitation centers or former hotels for use as emergency housing as well as renting temporary emergency shelter properties. However, many of these one-time dollar sources have been depleted. Unless new outside sources of funds become available for additional indoor emergency housing beds, the City's attention will likely turn to retaining existing beds.

Gaps in Partnerships

In addition to directly working with providers, the City of Seattle participates in the King County Regional Homelessness Authority (KCRHA) to coordinate funding for emergency housing and services.

Limitations in opportunities for partnerships with other agencies that hold properties in Seattle potentially suitable for emergency housing also presents challenges to expanding the supply of emergency housing. For example, some State agencies are not able to enter partnerships to provide land at no-cost for tiny house villages, as they are legally bound to charge market rents on land.

ACTIONS TO ADDRESS BARRIERS

Through the One Seattle Plan and other efforts, the City is exploring several strategies to address the barriers identified here. These strategies include:

- Supporting efforts to end homelessness by working interjurisdictionally on emergency housing solutions.
- Advocating for additional state and federal sources of funding for operating and creating new indoor emergency shelter beds.
- Exploring new partnerships and incentives with philanthropy, the design community, and developers that will result in additional redevelopment, development, and operations resources for emergency housing.
- Examining regulatory and procedural obstacles that hinder development of indoor emergency housing, particularly in building conversions, while maintaining minimum life safety standards.

By addressing these barriers, Seattle aims to better meet the growing need for emergency housing and shelter options for residents experiencing homelessness.

Geographic Analysis of Racial and Social Equity in Housing

Citywide analysis presented earlier in the Housing Appendix reveals deep and persistent racial and social disparities in housing opportunities. This section provides analyses of how zoning, development and land uses relate to where people of color and low-income people live in and around Seattle. We present these analyses to show how land use and housing policies, including the legacy of past racist policies and practices, contribute to neighborhood segregation and racial and social disparities in housing and place-based quality of life outcomes.

Patterns of Where People Live

Patterns of where people live reflect policies and market forces that limit or expand choices in housing alongside the choices made by individual households within this system. This section looks at how population changes in neighborhoods and the current geography of racial and ethnic demographics relate to the decisions of years past and ongoing policy. This includes a look back at historical redlining maps, a consideration of the Urban Village Strategy, and zoning.

HISTORICAL EXCLUSION THROUGH REDLINING[141]

Redlining maps were created by the Home Owners' Loan Corporation (HOLC) in the wake of the Great Depression as part of the New Deal in the 1930s. The expressed purpose in the HOLC's "City Survey Program" was to create maps to assess mortgage lending risk at the neighborhood level in large cities throughout the United States. HOLC agents used a mix of local data, reports, surveys, and interviews in making these maps. Many of these interviews were with local lenders, real estate brokers, liquidators, and insurance agencies.[142]

Each of these groups, including the HOLC agents, brought their own racial and social biases into the mapmaking process. In this sense, the maps reflected existing systems, both public and private, in denying housing capital to people of color and in devaluing the neighborhoods and homes where they lived.

The HOLC maps graded neighborhoods on a scale of lowest lending risk to highest, from "A" to "D." In Seattle, the highest grades typically included those neighborhoods with high homeownership rates, residents who had upper middle-class incomes or higher, racial covenants that prevented people of color, Jewish people, and/or certain foreign-born populations from living there, and development covenants that prevented development aside from detached homes. The

[141] See also: The Seattle Municipal Archives article "Redlining in Seattle" for more information about how community organizers and local leaders organized to change the practices of redlining and racialized lending and in the 1970s.

[142] Michney, Todd M. "How the City Survey's Redlining Maps Were Made: A Closer Look at HOLC's Mortgage Rehabilitation Division." Journal of Planning History. 2022, Vol. 21 (4), 316-344.

neighborhoods with the highest HOLC grades also had good access to neighborhood schools and parks. The lowest grades were given to neighborhoods that had larger proportions of low-income households, mixes of nationalities, high rates of Black households, proximity to substantial sources of pollution and environmental hazards, little access to schools and parks, a lack of transportation connectivity, and high vacancy rates.[143] Central business districts and industrial areas were not mapped, as these were viewed by the HOLC as commercial areas. Figure A-126 shows redlining maps for Seattle, along with current city boundaries.

Figure A-125 presents recent data from the 2020 Census on the demographics of people living in areas that had been assigned HOLC grades. The areas the HOLC graded highest still have fewer people of color. While Seattle continues to work towards a more equitable future, the legacy of historical exclusion, racial biases, and unfair policies prevalent in this period remain visible in the distribution of race and ethnic groups today. Furthermore, zoning large areas of the city for predominantly detached homes has perpetuated economic exclusivity of the highest graded neighborhoods, precluding many householders of color, who have disproportionately lower incomes, from entering them.

Figure A-124
Population and Housing Units by HOLC Grade

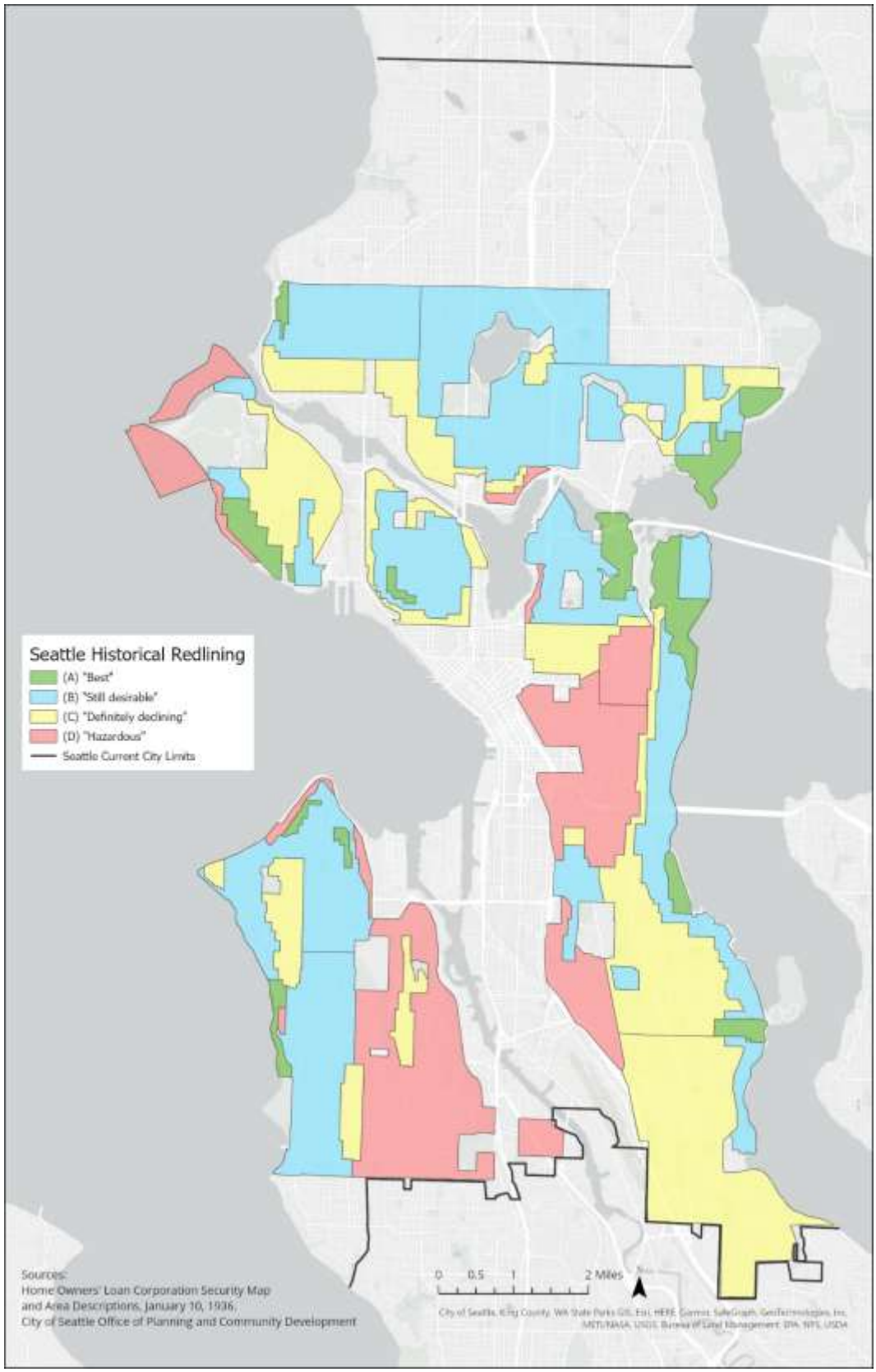
	Population				Housing	
	Total Population in each HOLC Area	Percent of Area's Residents Who are People of Color	Percent of Area's Residents Who are White	Percent of Citywide Population in each HOLC Area	Units	Percent of Citywide Housing Supply in each HOLC Area
HOLC Grade "A"	16,937	21%	79%	2%	6,154	2%
HOLC Grade "B"	209,630	30%	70%	28%	93,052	27%
HOLC Grade "C"	162,801	47%	53%	22%	76,174	22%
HOLC Grade "D"	95,768	52%	48%	13%	44,391	13%
Not Mapped*	251,879	42%	58%	34%	125,856	36%
Total Citywide	737,015	41%	59%	100%	345,627	100%

Sources: 2020 decennial Census, U.S. Census Bureau; Analysis by City of Seattle Office of Planning and Community Development based on the location of the center of 2020 census blocks.

Note: Neighborhoods unincorporated as of 1933 were not included in HOLC mapping. Many have racially restrictive covenants on the deed which are no longer enforceable, as well as detached home development covenants which remain enforceable under current state law. In addition, incorporated neighborhoods with heavy commercial or industrial presence, like the Central Business District, were not included in HOLC mapping.

[143] "Mapping Inequality: Redlining in New Deal America," a project by Nelson R., Winling, L., Marciano, R., et al. Hosted at the University of Richmond.

Figure A-125
Redlining in Seattle



REGIONAL SHIFTS IN COMMUNITIES OF COLOR

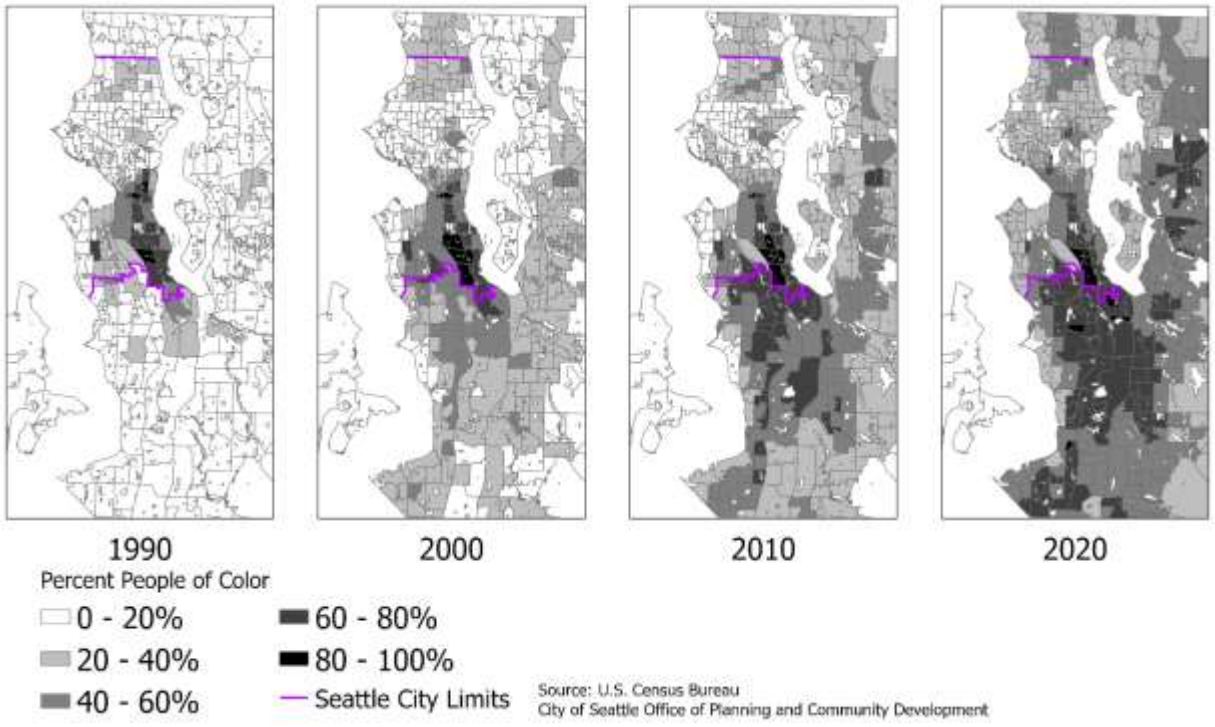
To make sense of demographic changes in Seattle neighborhoods we need regional context. The side-by-side maps in Figure A-127 provide some of this context. These maps show patterns in the share of the population who are people of color in neighborhoods in and around Seattle as measured in the last four decennial censuses.

As of 1990, much of the racial and ethnic diversity in King County was still concentrated in Seattle's Central District and in Southeast Seattle. Rapid distributional changes occurred beginning in the 1990s as the population of color in many parts of King County grew; this growth was especially rapid in areas to the south and southeast of Seattle such as Tukwila and SeaTac. Neighborhoods in parts of north Seattle, Shoreline, Bellevue, and Redmond also saw increases in diversity. Furthermore, many neighborhoods in Seattle that saw little change before 2010 in the share of population comprised of people of color experienced increasing diversity in the 2010s.

These changes have been accompanied by a dramatic decline in and around Seattle's Central District in the proportion of residents who are people of color. This trend largely reflects reductions in the Black population within these neighborhoods—a trend that began in the 1970s and continues today.

While census data do not allow us to measure the extent to which displacement has been involved, data suggest that many people of color have left the city of Seattle and moved to nearby, rapidly diversifying, communities located to Seattle's south and southeast.

Figure A-126
Percent People of Color by Census Tract, 1990 to 2020



CHANGES IN THE RACIAL AND ETHNIC MAKEUP OF SEATTLE NEIGHBORHOODS

Another way to gain insights into demographic changes across the city's neighborhoods is to examine rates of growth for the overall population and for groups of color. We present a pair of additional maps in Figure A-128 focused on the population of color. The map on the left shows rates of growth for the population of color in Community Reporting Areas between 2010 and 2020. The map on the right shows the share of each area's residents who are people of color. Side by side, these maps show that many of the neighborhoods in which the population of color grew most rapidly are areas with relatively few residents of color. In contrast, the areas with the lowest population-of-color growth rates, and with net decreases in the population of color, happened where people of color are a large share of residents.

Trends within individual racial and ethnic groups vary greatly by community reporting area and by group. Some of these trends are continuations of trends seen in previous decades, while others are newer.[144]

Trends from 2010 to 2020 include:

- Shrinking shares of residents who are Black in and around the Central District, and in much of Southeast Seattle and downtown, but increasing shares in some neighborhoods in north Seattle and in West Seattle.
- Increasing shares of residents who are Asian in South Lake Union, Downtown, Queen Anne, and most of north Seattle, but decreasing shares in the Chinatown-International District and Southeast Seattle.
- Decreasing shares of neighborhood populations who are white in most areas, except for Southeast Seattle, where the share increased.
- Increases in the shares of people who identify as multiple races across all Seattle neighborhoods.
- Increases in the shares of residents who are Hispanic in almost all areas of the city. South Park was one of the few exceptions to this trend. South Park, which had seen a burgeoning Hispanic population in prior decades, saw a reduction between the 2010 and 2020 censuses in both the Hispanic proportion and count of neighborhood residents.[145]

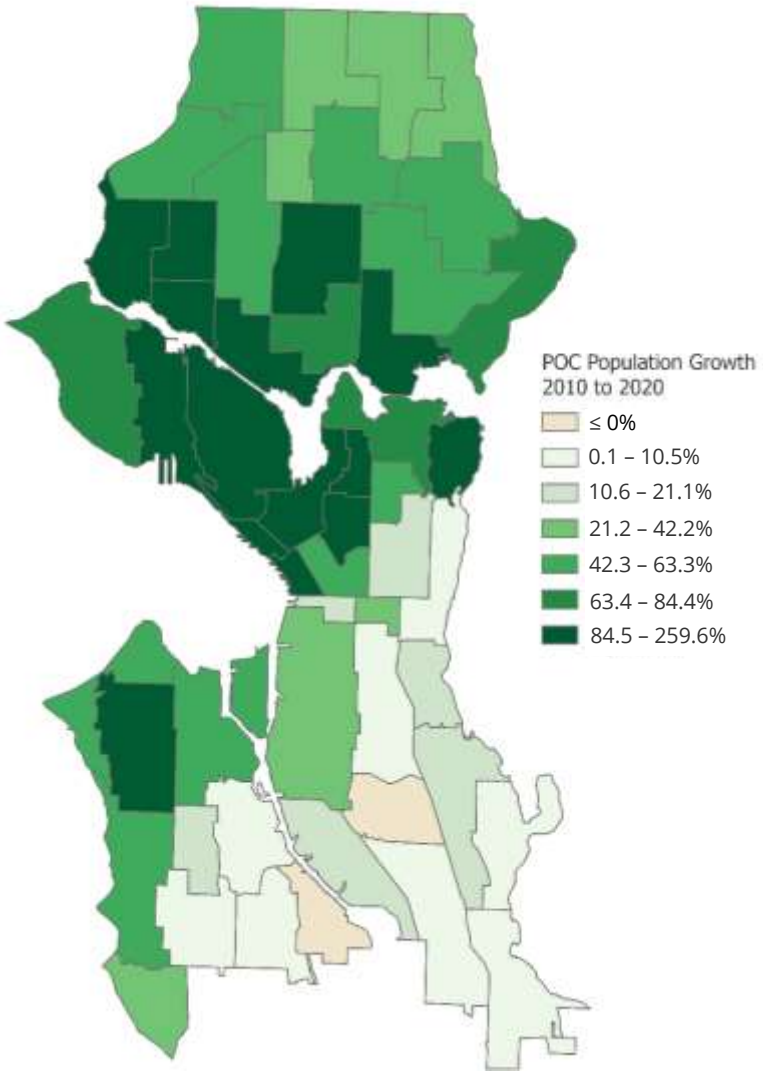
[144] A tabular report with decennial census estimates on race and ethnicity from 1990, 2000, 2010, and 2020 is available for Seattle and its Community Reporting Areas on OPCD's Population and Demographics webpages.

[145] Some but not all of the reduction in census statistics for Hispanics in South Park is likely attributable to the worsened undercount of Hispanics found nationally in the 2020 census. (Undercounts in the 2020 Census are described in a March 2022 Census Bureau press release.)

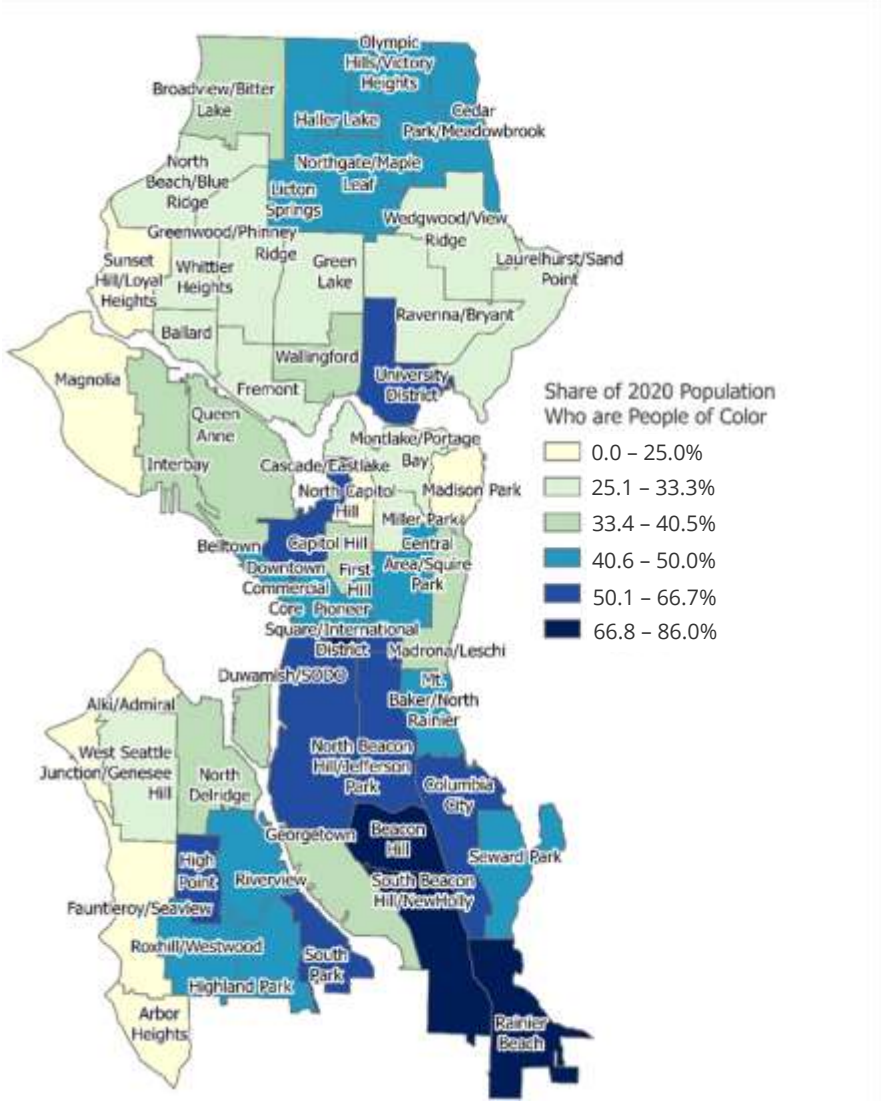
Figure A-127

Community Reporting Areas (CRA) and People of Color

Population of Color Growth Rates, 2010 to 2020



Share of CRA Population Who Are People of Color



GROWTH AND DIVERSITY IN URBAN CENTERS AND URBAN VILLAGES

This section examines how Seattle's growth strategy prior to the 2044 One Seattle Plan is associated with changes in the racial diversity of Seattle's neighborhoods. The Urban Village Strategy was adopted in 1994 as part of the City's first comprehensive plan under the GMA. Since that time, Urban Centers and Urban Villages (UCUVs) have been focus areas for housing and job growth with the goal of locating housing in dense areas with high levels of access to transit, jobs, services, and other important amenities and infrastructure investments.

Figure A-129 which is based on decennial census counts, shows the distribution in 2010 and 2020 of people of color, the white non-Hispanic population, total population, and housing units by location inside or outside of an urban center or village. Compared with white persons, persons of color are disproportionately likely to live in UCUVs. The city's UCUVs saw rapid population growth between 2010 and 2020, with the population of color growing especially rapidly in these areas. Over the same period, decennial census figures indicate that the city added approximately 8,000 housing units outside UCUVs and 50,000 inside UCUVs. By 2020, half of the city's residents of color lived in UCUVs while the proportion of white people living in UCUV's reached 36 percent.

While broad data on growth presented in Figure A-129 shows net changes in the population, it does not allow us to discern the numbers of people moving out of their homes amidst the rapid growth occurring in their neighborhoods. Community input and displacement-related data points suggest that many households, particularly those who are low income or people of color, have been displaced from these areas over this period.

Figure A-128
Distribution of Population and Housing Units:
Inside and Outside of Urban Centers and Urban Villages

	Population						Housing	
	People of Color		White		Total		Number of Units	Percent of Units
	Number	Percent	Number	Percent	Number	Percent		
2020								
Inside UCUVs	149,369	50%	158,938	36%	308,307	42%	181,810	49%
Outside UCUVs	149,478	50%	279,230	64%	428,708	58%	186,498	51%
Total	298,847	100%	438,168	100%	737,015	100%	368,308	100%
2010								
Inside UCUVs	91,785	45%	129,241	32%	221,026	36%	130,400	42%
Outside UCUVs	113,297	55%	274,337	68%	387,634	64%	178,116	58%
Total	205,082	100%	403,578	100%	608,660	100%	308,516	100%

Source: 2010 and 2020 decennial Census estimates, U.S. Census Bureau; City of Seattle Office of Planning and Community Development.

RACIAL AND ETHNIC DIVERSITY IN ZONE CATEGORIES

Next, we look at racial and ethnic diversity of residents by the zoning category of the blocks where they reside. This can help provide insights into the racially disparate impacts of local land use policies given that zoning is the local legal mechanism that most directly inhibits or enables neighborhood growth and change.

Figure A-130 presents zone categories alongside housing units and population. Each of these zone categories is a combination of individual zones largely consistent in how they regulate development, but varied in individual heights, densities, or in mix (where mixed-use). As shown, in the table zone categories vary greatly in terms of the number of housing units and population that live in them. The table also shows total housing units and population in the city of Seattle as a whole, and the remainder of King County for broader context.

Figure A-129
2020 Decennial Census Housing Units and Population Counts by Major Zone Category

	Housing Units	Percent of Housing Units	Population	Percent of Population
Commercial	10,578	2.9%	17,186	2.3%
Downtown	28,256	7.7%	40,319	5.5%
High-Density Multifamily	29,345	8.0%	41,859	5.7%
Industrial	2,138	0.6%	4,771	0.6%
Lowrise Multifamily	98,047	26.6%	182,970	24.8%
Major Institutions	1,639	0.4%	15,104	2.0%
Master Planned Community	802	0.2%	1,390	0.2%
Neighborhood Commercial	49,798	13.5%	76,448	10.4%
Neighborhood Residential	122,066	33.1%	312,796	42.4%
Residential Small Lot	6,236	1.7%	16,483	2.2%
Seattle Mixed	19,403	5.3%	27,689	3.8%
Total City	**368,308**		**737,015**	
Total Remainder King County	**600,926**		**1,532,660**	

Sources: Decennial Census, OPCD

Note: Adopted zoning as of May 8, 2023 was attributed to each census block based on the zoning of the largest group of housing units in a block, identified using King County Assessors data.

Figure A-131 also shows the shares of population by race and ethnicity for Seattle and the remainder of King County to better understand how diverse we are as a city and to provide relative benchmarks for considering the racial diversity of Seattle's zone categories. Zone groups and City and remainder of King County totals are listed by the population share who are people of color.

Figure A-130

Major Zone Categories by Detailed Race and Ethnicity from the 2010 and 2020 Decennial Censuses

	Population	Population Percentage								
		American Indian or Alaska Native	Asian	Black or African American	Hispanic	Pacific Islander	Other	Multiple races	**Total POC Population**	White, non-Hispanic
2020 Census										
Master Planned Community	1,390	1%	29%	36%	8%	0.0%	0.4%	4%	78%	22%
Industrial	4,771	2%	21%	8%	16%	1%	1%	10%	59%	41%
Seattle Mixed	27,689	0.4%	40%	5%	8%	0.2%	1%	6%	59%	41%
Major Institutions	15,104	0.4%	30%	4%	12%	1%	0.4%	8%	55%	45%
Residential Small Lot	16,483	1%	22%	9%	12%	0.5%	1%	8%	52%	48%
Downtown	40,319	1%	29%	8%	8%	0.3%	1%	5%	51%	49%
Total Remainder King County	**1,532,660**	**1%**	**21%**	**6%**	**12%**	**1%**	**1%**	**7%**	**48%**	**52%**
Commercial	17,186	1%	16%	12%	10%	0.3%	0.5%	6%	46%	54%
Neighborhood Commercial	76,448	0.4%	17%	9%	9%	0.2%	1%	7%	44%	56%
High-Density Multifamily	41,859	1%	18%	8%	9%	0.3%	1%	6%	43%	57%
Lowrise Multifamily	182,970	0.4%	15%	10%	9%	0.3%	1%	7%	42%	58%
Total City	**737,015**	**0.4%**	**17%**	**7%**	**8%**	**0.3%**	**1%**	**7%**	**41%**	**59%**
Neighborhood Residential	312,796	0.4%	13%	4%	7%	0.2%	1%	8%	33%	67%
2010 Census										
Total Remainder King County	**1,322,589**	**1%**	**15%**	**5%**	**10%**	**1%**	**0.2%**	**4%**	**36%**	**64%**
Total City	**608,660**	**1%**	**14%**	**8%**	**7%**	**0.4%**	**0.2%**	**4%**	**34%**	**66%**

Sources: City of Seattle Office of Planning and Community Development; U.S. Census Bureau decennial Censuses 2020 & 2010; King County Department of Assessments, compiled by City of Seattle July 2022.
Notes: Zone categories are based on effective zoning as of May 2023. The population in each census block is assigned to the Zone Category where the most housing units according to the King County Department of Assessments as of 2023 were counted. All population groupings are of non-Hispanic, while the Hispanic ethnicity category includes persons of any race.

Key findings from Figure A-131 include:

- Within the zone categories, only Neighborhood Residential has a lower share of residents who are people of color than the city as a whole. This finding is symptomatic of historical policies that excluded people of color from living in neighborhoods dominated by single-family homes. The relatively lower shares of individual racial and ethnic groups among people living in areas zoned Neighborhood Residential also reflects ongoing economic and development barriers in this zone category that limit housing opportunities, particularly for people of color.

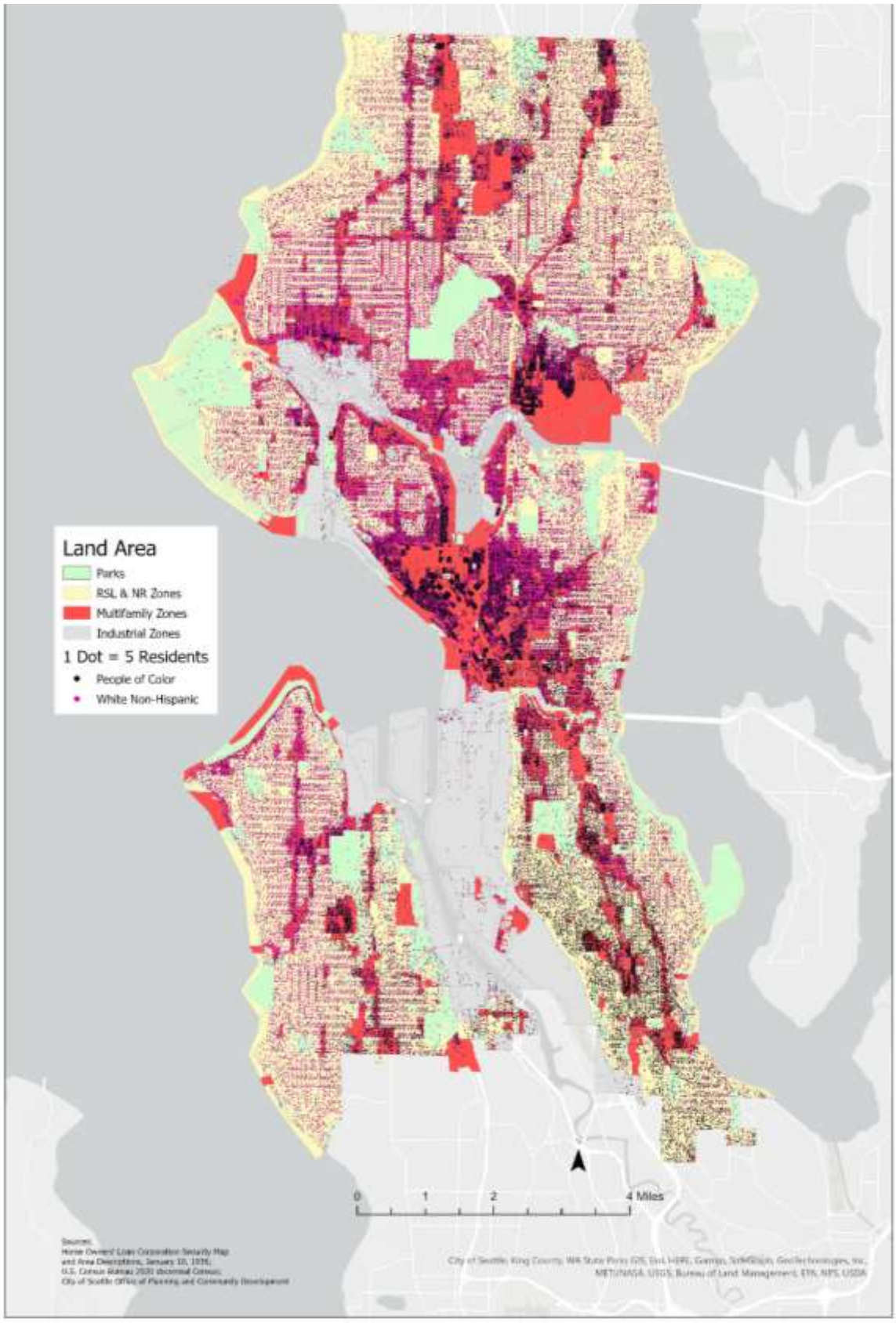
- Zones allowing moderate- and higher-density housing (e.g., attached housing, cottage style housing, stacked flats, townhomes; multifamily buildings; and mixed-use buildings) is associated with greater racial and ethnic diversity than areas with Neighborhood Residential zoning characterized primarily by single-family dwelling units on large lots. Neighborhoods allowing moderate and higher density housing have also accommodated much of the increased population in the last decade, as discussed in other sections of this appendix.

- While the share of Seattle's population who are people of color grew between 2010 and 2020, the share of people of color grew more quickly in the remainder of King County. Trends have not been uniform amongst all racial and ethnic groups; notably, the Black share of the population decreased between 2010 and 2020 in Seattle while slightly increasing in the remainder of King County. Zones that have added additional housing unit development capacity in recent years, such as those that are found in Urban Centers and Villages, have led to those neighborhoods being more diverse, while Neighborhood Residential has stayed less diverse. These findings echo demographic trends discussed earlier in the Housing Appendix.

As the number of units in moderate and higher density neighborhoods continues to grow over the next 20 years, the potential of the new units to do a good job of meeting the needs of an increasingly diverse population will depend on a number of factors including their affordability profiles and their collective ability to house a variety of household sizes and configurations from one-person households to multigenerational families. Forms of zoning that enable Neighborhood Residential zones to accommodate more units and a greater variety of housing types, such as city's 2019 ADU reforms and the future allowance of middle housing, will also allow these neighborhoods to become increasingly diverse.

Figure A-131 is limited in that it does not distinguish between neighborhoods in different parts of the city that share the same zoning category. There is, in fact, considerable variation in levels of racial and ethnic diversity in neighborhoods that share a zoning category depending on where in the city the neighborhood is located. For instance, Figure A-132 shows that Neighborhood Residential zones in some areas of the city such as in Rainier Valley have higher shares of people of color than other Neighborhood Residential zones throughout the City.

Figure A-131
Zoning and Residents



Housing Affordability and Income

This section looks at variations in the affordability of Seattle's housing supply and household incomes by neighborhood. It describes where proportionally larger shares of low-income households live, where the housing supply is affordable to households of various income levels, and where the greatest shares of households are cost burdened. This analysis uses 2019 5-year CHAS data from the American Community Survey (ACS) which include both subsidized and unsubsidized units.

Affordability is a key constraint on housing and neighborhood choice, especially for lower income households. Neighborhoods with less affordable housing preclude households with lower incomes from entering them or remaining in them without becoming cost burdened.

SHARE OF HOUSEHOLDS BY INCOME CATEGORY BY CENSUS TRACT

Historical practices, existing land use patterns, and localized housing prices have resulted in concentrations or exclusion of low-income households in different parts of the city. Examining household incomes by neighborhood assists us in understanding these patterns and in planning programs, policies, and capital projects important for equitably serving low-income households.

Figure A-133 shows three maps with the shares of households by census tract at or below the income thresholds of 30% of AMI, 50% of AMI, and 80% of AMI.

There is a great deal of variation between neighborhoods in the prevalence of households with incomes at or below 30% of AMI, with some of the greatest concentrations around Pioneer Square. High prevalence of households with incomes of 50% of AMI or under is additionally found in the Duwamish Valley, Rainier Valley, Downtown, and a handful of neighborhoods in North Seattle, including Aurora-Licton Springs, Northgate, and Lake City. Concentrations of households in these extremely and very low-income categories point to opportunities for creating equitable policies that serve these households and their neighborhoods.

When looking at the prevalence of households at or under 80% of AMI, we see a somewhat more diffuse pattern. However, many neighborhoods, particularly those with predominantly single-family detached housing have very low shares of households with incomes under 80% of AMI, pointing to the economic exclusivity of these neighborhoods.

AFFORDABILITY OF HOUSING

Figures A-134 and A-135 present the share of housing units in each census tract affordable at or below a specific income level by tenure based on analysis of CHAS data. Figure A-135 shows rental housing affordability at or under 30%, 50%, and 80% of AMI while Figure A-134 shows ownership housing affordability at or under 50%, 80%, and 100% of AMI. These maps help us understand the large variations in housing affordability that exist between areas within Seattle. However, some caution is needed in viewing them as the reliability of the estimates can be low where only small numbers of housing are either renter or owner-occupied.

Housing costs in the ACS-derived CHAS data are lower than those reflected in our analyses of CoStar data presented in earlier sections of this appendix. This reflects a variety of differences in these datasets including the wider inclusion of subsidized units in the ACS. The CHAS data are also

different in that they are based primarily on responses from households and are not as up to date as the CoStar data.

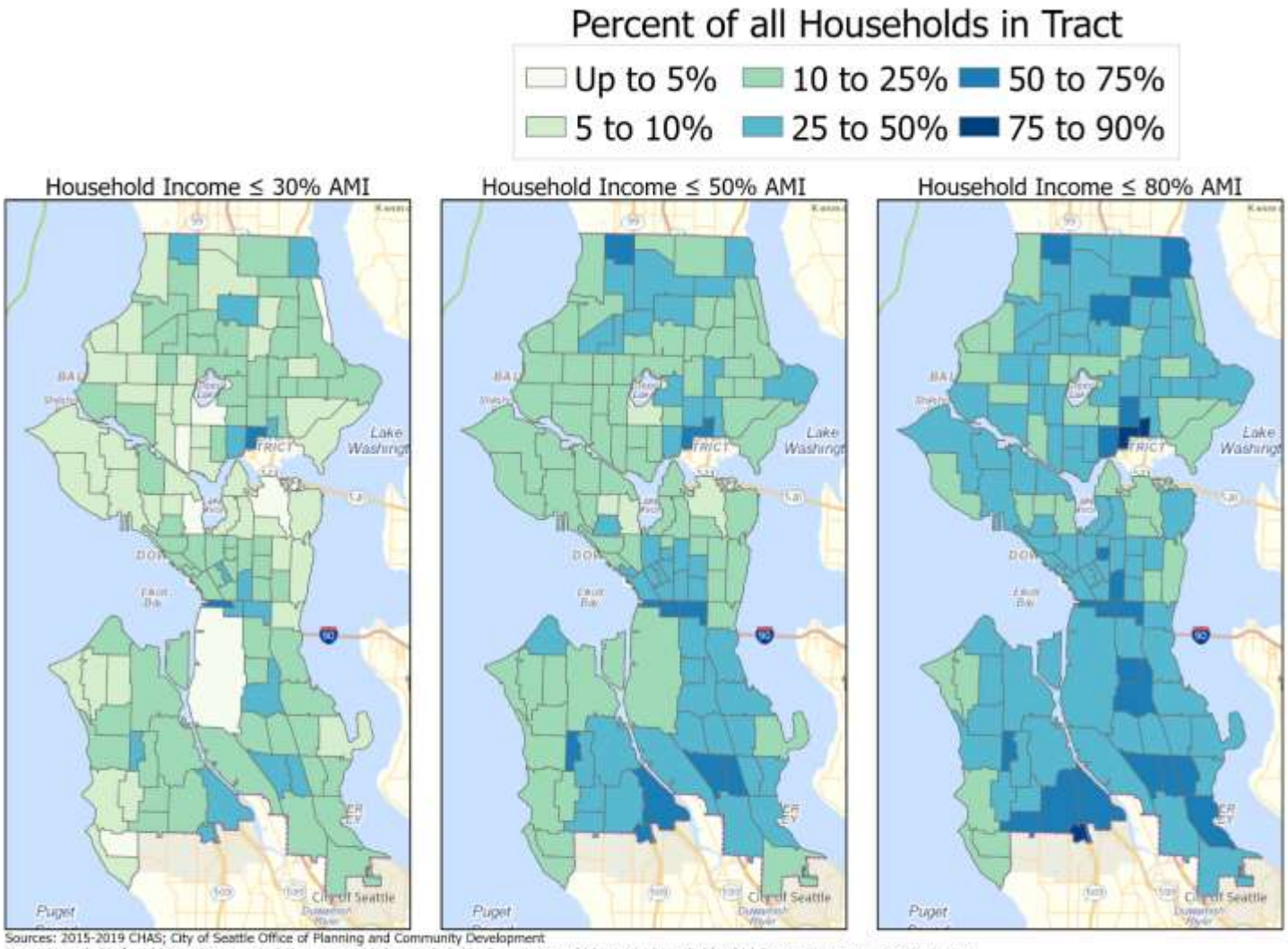
The vast majority of tracts in Seattle have 5 percent or fewer ownership units affordable at or below 80% of AMI. Ownership units affordable at or below 100% of AMI are also scarce in most tracts. Only in and around South Park are more than half of owner units estimated to be affordable at or below 100% of AMI. It is important to note that the affordability estimates for ownership housing use *survey respondents' estimates* of what their home would sell for *if* it were for sale rather than actual sales prices, such estimates tend to lag trends in sales prices in rapidly changing markets.

The vast majority of tracts have very low shares of rental units affordable to households at or below 30% of AMI. Nearly no tracts have a majority of rental housing units affordable to households at or below 50% of AMI. A small number of tracts, mostly in the city's southern and northern neighborhoods, have majorities of rental units affordable at or below 80% of AMI. While useful for picturing relative patterns in affordability by neighborhood, these maps do not fully capture challenges. For example, roughly a third of rentals affordable at 80% of AMI are not available to low-income households because they are rented by higher income households.

HOUSING COST BURDEN BY CENSUS TRACT

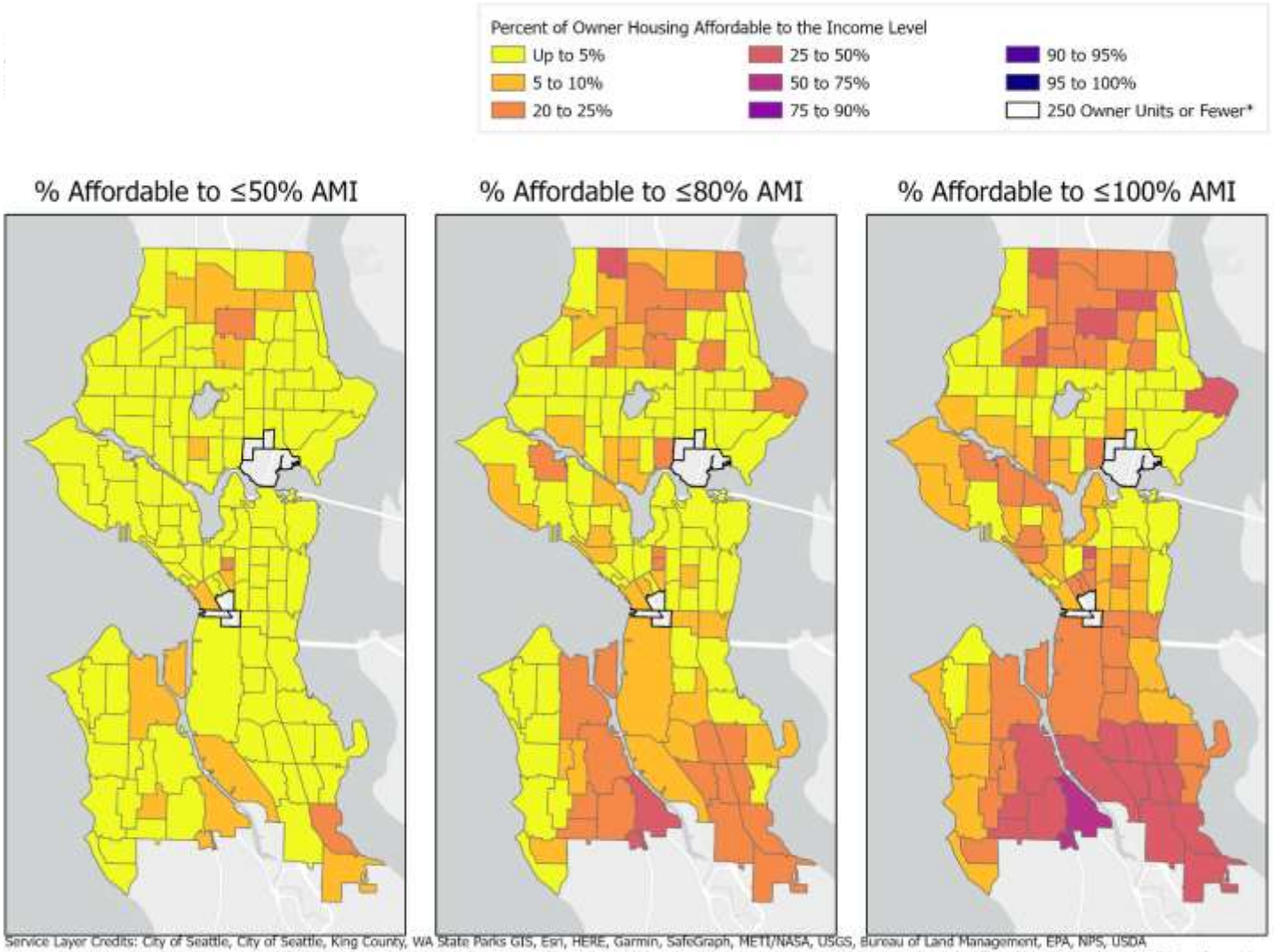
Figure A-136 following this section shows the estimated percentages of households in each census tract with housing costs exceeding 30 percent or 50 percent of their income, respectively. Not surprisingly, high percentages of cost-burdened households are found in many of the tracts where there are large shares of lower-income households. This indicates that, even in areas with a greater supply of housing that is relatively lower in price compared to other parts of the city, there is still an acute shortage of housing units affordable to households with lower incomes.

Figure A-132
Households by AMI Level



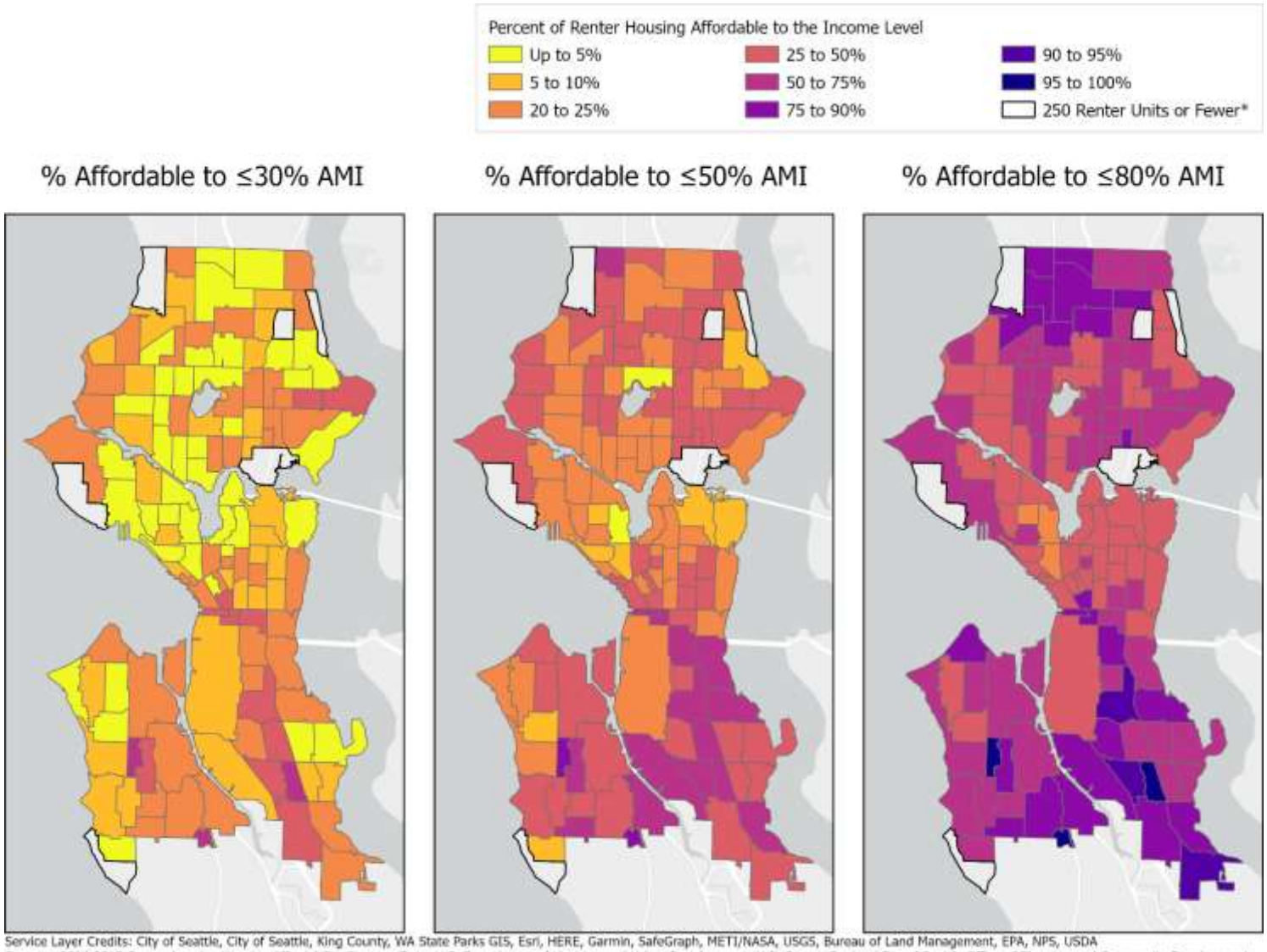
Sources: 2015-2019 CHAS; City of Seattle Office of Planning and Community Development
Notes: Households for which no income calculation are provided are included in denominator, which may be households which have no income or negative income
Census Tracts with fewer than 250 households are not included in this analysis due to relatively high margins of error, which decrease reliability of the data.

Figure A-133
Affordability of Ownership Housing by Area Median Income (AMI) Level



Service Layer Credits: City of Seattle, City of Seattle, King County, WA State Parks GIS, Esri, HERE, Garmin, SafeGraph, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, USDA
Sources: 2014-2019 Comprehensive Housing Affordability Strategy Data, U.S. Department of Housing and Urban Development; U.S. Census Bureau; City of Seattle Office of Planning and Community Development
*Tracts with 250 owner units or fewer were excluded from this analysis due to high margins of error, which decreases the reliability of data in these census tracts.

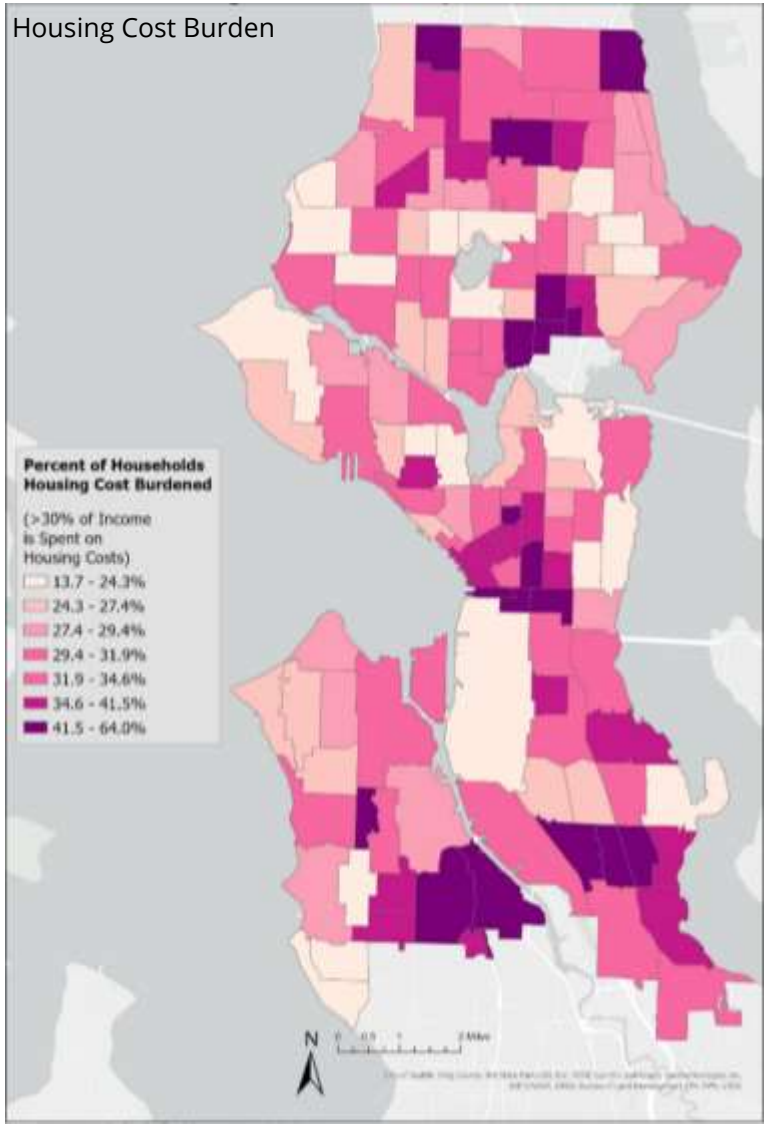
Figure A-134
Affordability of Rental Housing by Area Median Income (AMI)

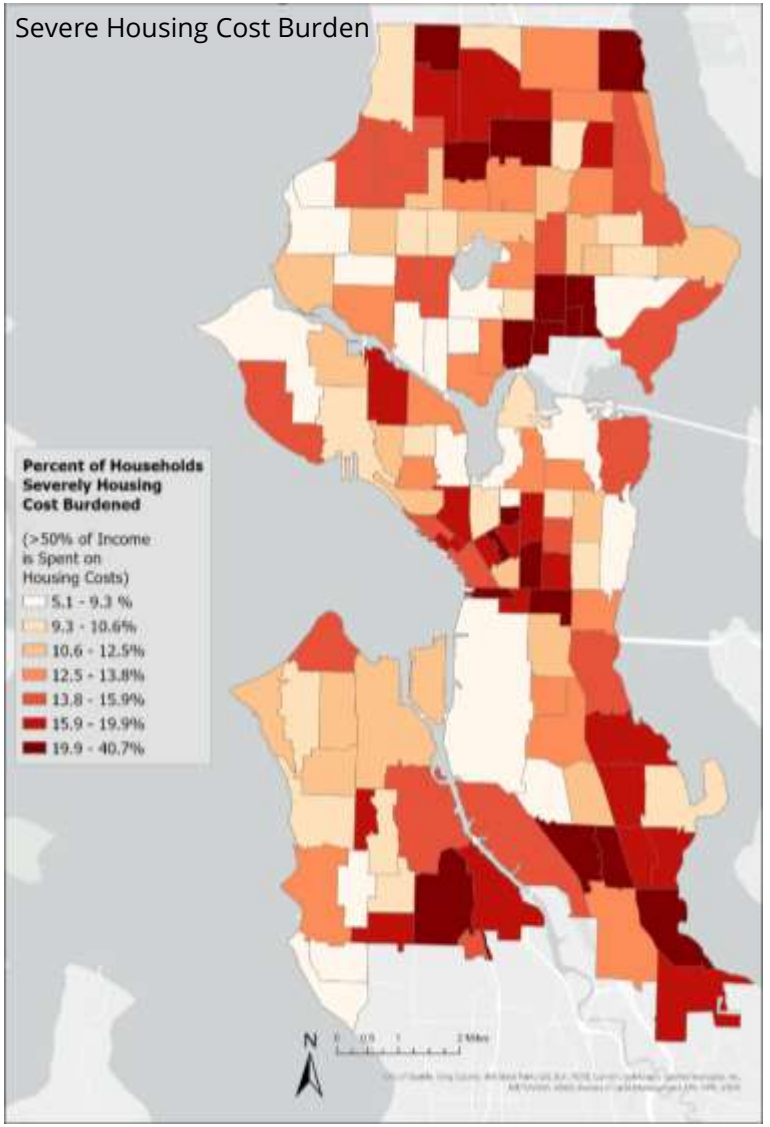


Service Layer Credits: City of Seattle, City of Seattle, King County, WA State Parks GIS, Esri, HERE, Garmin, SafeGraph, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, USDA
Sources: 2014-2019 Comprehensive Housing Affordability Strategy Data, U.S. Department of Housing and Urban Development; U.S. Census Bureau; City of Seattle Office of Planning and Community Development
*Tracts with 250 rental units or fewer were excluded from this analysis due to high margins of error, which decreases the reliability of data in these census tracts.

Figure A-135

Housing Cost Burden and Severe Housing Cost Burden of All Households





LOCATION OF INCOME-RESTRICTED HOUSING DEVELOPMENTS

Income-restricted housing reduces local displacement pressures and can contribute to creating more economically and racially inclusive neighborhoods. Moreover, income-restricted housing provides greater housing stability and access for households unable or struggling to afford the cost of housing in Seattle. However, income-restricted housing is not equally distributed throughout the city, with zoning creating or impeding opportunities for income-restricted housing development in neighborhoods.

Figure A-137 provides the number of City funded units in structures newly built and placed in-service, meaning became occupied, since 2013 in each zone category by household tenure. This analysis is for publicly subsidized development of income-restricted housing for households with incomes at or below 60% of AMI for renters and 80% of AMI for owners. Income-restricted units included in otherwise unrestricted market-rate properties to satisfy land use or incentives requirements (e.g., MFTE, MHA) are not included in this analysis.

All income-restricted rental apartments built since 2013 with City funding are in zones that allow for multifamily development. Income-restricted homes for income-eligible buyers are primarily in lowrise and residential small lot zones, which typically allow townhouses and other smaller-scale attached housing developments.

Figure A-136
City Funded Income-Restricted Units Built Since 2013 by Zone Category on Permit and Tenure

City Funded Income-Restricted Units Built Since 2013 by Zone Category on Permit and Tenure				
Zone category on permit[1]	Rental		Owner	
	Units (% of units)	Projects (% of projects)	Units (% of units)	Projects (% of projects)
Commercial	1,155 (15%)	14 (16%)	-	-
Downtown	881 (12%)	9 (11%)	-	-
Highrise and Midrise Multifamily	630 (8%)	9 (11%)	-	-
Industrial	-	-	-	-
Lowrise Multifamily	939 (12%)	11 (13%)	72 (71%)	5 (63%)
Major Institutions	-	-	-	-
Master Planned Community	-	-	-	-
Neighborhood Commercial	3,565 (47%)	37 (44%)	-	-
Neighborhood Residential	-	-	-	-
Residential Small Lot	-	-	29 (29%)	3 (38%)
Seattle Mixed	457 (6%)	5 (6%)	-	-
Total	**7,627 (100%)**	**85 (100%)**	**101 (100%)**	**8 (100%)**

Sources: City of Seattle Office of Planning & Community Development; City of Seattle Office of Housing

[1]Zoning codes selected based on the most predominant zoning by permit; however, some project sites may be developed under more than one zone or under other site conditions, such as a station area overlay.

Figure A-138 shows the number of City funded rental units built since 2013 by the number of stories in the project and the maximum height allowed by zoning. Key takeaways from Figure A-138 are:

- Approximately 81 percent of apartments in income-restricted rental properties are in 5 to 8 story buildings. Of the income-restricted units in 5 to 8 story buildings, most were developed in zones with height limits of 50 to 85 feet, but a sizeable number are midrise buildings in zones allowing taller buildings.
- While some older projects are 1 to 4 stories, only 15 percent of rental units are in these projects. Fifteen of the 19 projects under 5 stories opened between 2013 and 2019.
- Only one project is more than 9 stories tall. The Office of Housing noted that this was a surplus Sound Transit site provided at no cost to the developer.

The height of building that low-income housing developers are able to finance appears to be in the 5 to 8 story range; it could be that providers have a more difficult time financing highrise developments even if allowed by zoning. In addition, market conditions in zones with residential height limits greater than 85 ft. may be barriers to income-restricted housing development. This is likely due to higher land prices commanded in these zones as well as the higher construction costs associated with building structures greater than 85 feet (e.g., reinforced concrete and steel construction rather than traditional wood frame; elevators with more advanced technology and infrastructure requirements).

Beyond showing that 5 to 8 stories have provided the "sweet spot" for income-restricted rental housing, these findings provide a strong indication that zones allowing 5 to 8 story multifamily housing will also be the most likely to see income-restricted rental housing development in the future.

Figure A-137
City Funded Income-Restricted Rental Units Built Since 2013
by Maximum Zoned Residential Height Allowable on Permit and Actual Stories Built

Zoning height limit on permit[1]	Units (% of Units)			Projects (% of Projects)		
	1 to 4 Stories	5 to 8 Stories	9+ Stories	1 to 4 Stories	5 to 8 Stories	9+ Stories
< 50 ft.	898 (12%)	587 (8%)	-	14 (16%)	6 (7%)	-
50 to 85 ft.	223 (3%)	4,420 (58%)	-	5 (6%)	50 (59%)	-
> 85 ft.	-	1,139 (15%)	360 (5%)	-	9 (11%)	1 (1%)
Total	**1,121 (15%)**	**6,146 (81%)**	**360 (5%)**	**19 (22%)**	**65 (76%)**	**1 (1%)**

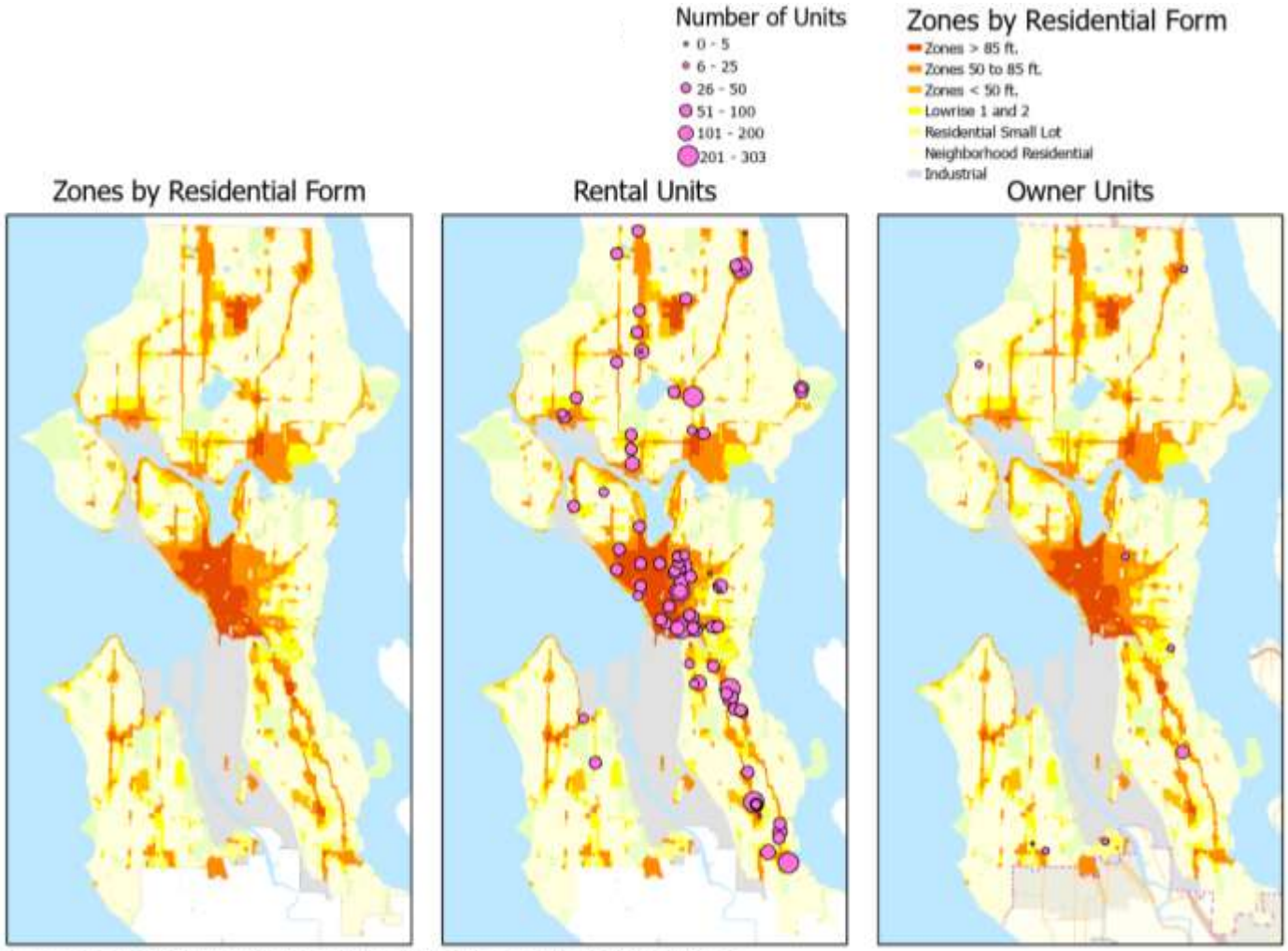
Sources: City of Seattle Office of Planning & Community Development; City of Seattle Office of Housing

[1]Zoning codes selected based on the most predominant zoning by permit; however, some projects may be developed under more than one zone or under other site conditions, such as a station area overlay.

Figure A-139 shows the general location of income-restricted units with regards to zoning by residential form. We provide detailed documentation of these zones by residential form in the Development Capacity section of this Housing Appendix.

Figure A-138

Income-Restricted Units Built and Placed In-Service Since 2013 and Zoning in Seattle



Sources: City of Seattle Office of Planning and Community Development; Seattle Office of Housing.

Note: This map shows existing zoning as of May 2023; however, site zoning may have been different at the time when each property was

USE OF VOUCHERS BY LOCATION

Housing vouchers are funded by federal and state dollars and distributed locally by SHA. These vouchers aim to ensure that tenants pay between 30 and 40 percent of their income on housing costs, while the voucher covers any remaining rent costs.

In addition, vouchers can be tenant based or project based, meaning tied to rental units in a specific publicly funded low-income housing property. Tenant-based vouchers are assigned to a household to be used to lease a housing unit in the local market. In choosing where to rent, households are given opportunities to reside in neighborhoods where there may otherwise be no subsidized rental housing, but where amenities such as job access, schools, transit, or public space fit their household needs.

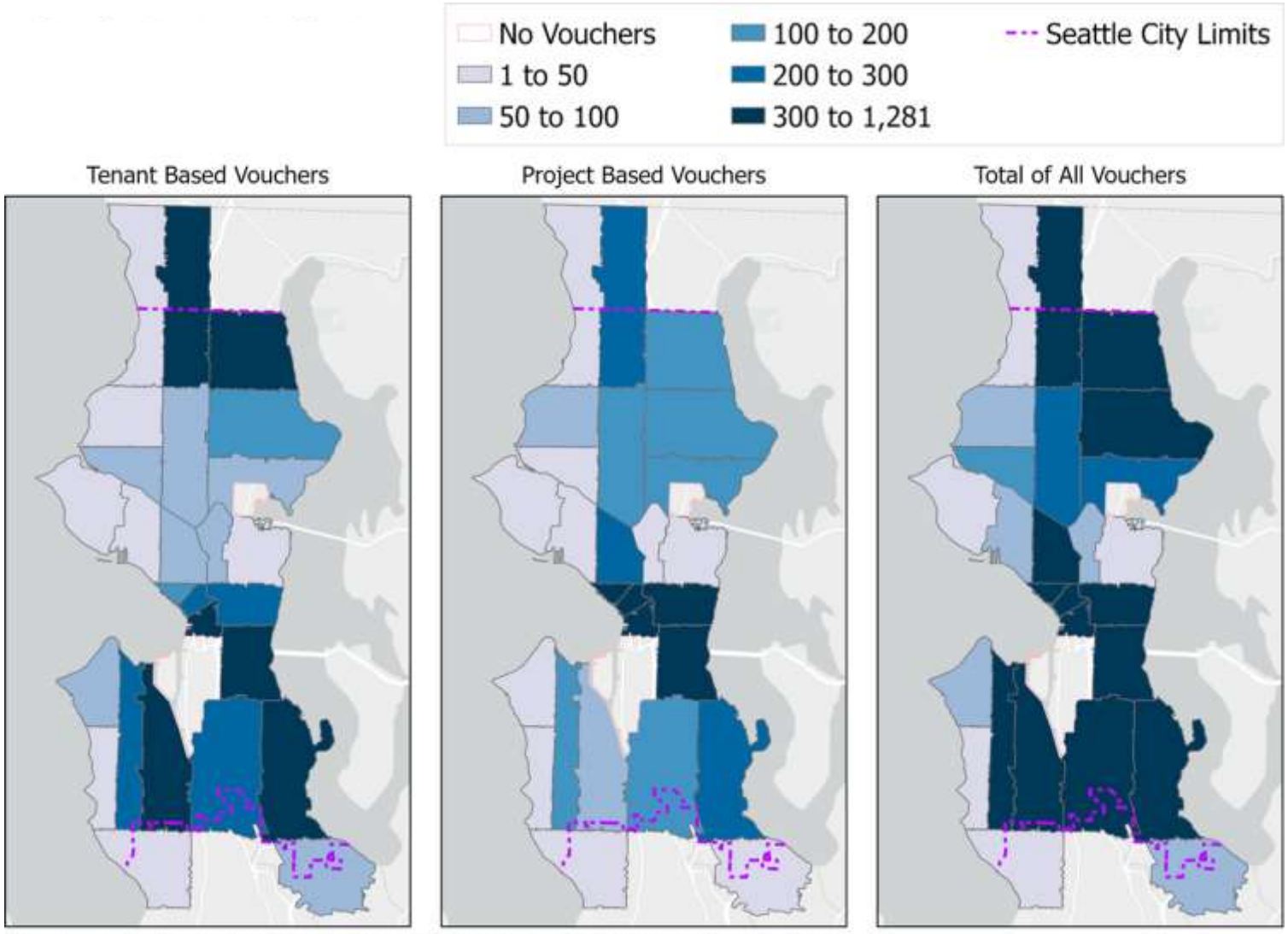
A variety of factors such as the location of project-based vouchers, price of housing, proximity to transit, and location in SHA's market area, can limit where vouchers are in use throughout the city. Low access to high-cost neighborhoods, in particular those that also have high access to neighborhood amenities, poses a question of economic justice for the City. As such, SHA has implemented programs aimed at increasing access to more neighborhoods throughout Seattle. One such program, Creating Moves to Opportunity (CMTO), provides additional services and resources to families during their search for a unit to make higher opportunity neighborhoods more accessible. Another program, the Family Access Supplement (FAS), increases the maximum value of a voucher so that households can afford units in higher opportunity neighborhoods.

Figure A-140 shows three maps indicating where vouchers are used locally based on ZIP Code. Key findings include:

- Tenant-based vouchers and project-based vouchers vary in their areas of use throughout Seattle. Tenant-based vouchers have concentrations in ZIP codes associated with Downtown, Rainier Valley, Delridge, Bitter Lake/Licton Springs, and Northgate. Project-based Vouchers are primarily concentrated in Downtown and Central Seattle.
- There is low voucher use in neighborhoods where the housing supply is primarily detached homes, in particular the West Seattle neighborhoods of Fauntleroy and Arbor Heights, Magnolia, Madison Park, Montlake, Broadview and Crown Hill. Neighborhoods with a large multifamily stock have greater voucher utilization.

In addition, tenant-based vouchers can be used outside of Seattle after the tenant has lived in Seattle with a voucher for one year, giving tenants the opportunity to find rental housing that fits their household's need anywhere in the United States. June 2023 data from SHA indicates that 659 of the 673 voucher holders who moved to SHA's market area ("ported in") held vouchers for 0-bedroom units, such as studios and small efficiency dwelling units, while 1,791 of the 1,808 voucher holders who moved out ("ported out") of Seattle held vouchers for 1-bedroom or larger units. This is tied to the limited local stock of reasonably priced multi-bedroom rental units, which may push multi-bedroom voucher holders to look outside of Seattle.

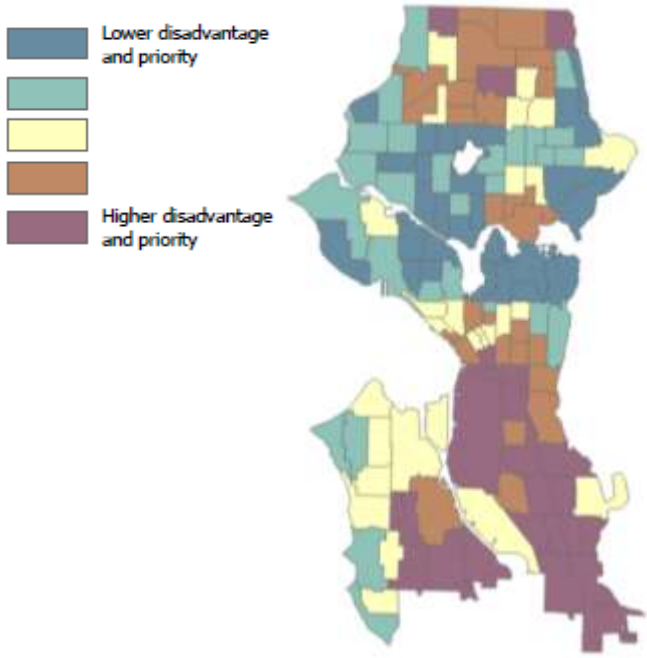
Figure A-139
Seattle Housing Authority Voucher Use by Zip Code



Sources: Seattle Housing Authority 2023; King County; City of Seattle Office of Planning and Community Development
Service Layer:City of Seattle, King County, WA State Parks GIS, Esri, HERE, Garmin, SafeGraph, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, USDA

Community Indicator Outcomes in Racial and Social Equity Priority Areas

Figure A-140
Seattle's Racal and Social Equity Index (2019)



A key principle in the Countywide Planning Policies is supporting more equitable access to housing and neighborhoods of choice, e.g., neighborhoods with essential components of livability such as well-funded schools, healthy environments, open space, and nearby employment. The CPPs call upon jurisdictions to analyze, monitor, and work to eliminate disparities in access to neighborhoods of choice. The City's Equitable Development Monitoring Program (EDMP), [146] launched in 2020 to inform and gauge progress on the Comprehensive Plan, helps fulfill this responsibility.

This section summarizes how neighborhoods in Racial and Social Equity (RSE) Priority Areas are faring on several community indicators selected for monitoring in the EDMP. As identified by the City's RSE Index,[147] RSE priority areas are census tracts where persons of color and people with socioeconomic and health disadvantages make up relatively large proportions of neighborhood residents. Figure A-141 shows the RSE Index used in the 2020 report; "RSE Priority Areas" are shown in orange and maroon.

- **Affordability of housing**—While scarce overall, rentals affordable to low-income households are more common in most RSE priority areas than elsewhere in the city. However, several RSE priority areas, including neighborhoods in the Central Area, have a relatively low share of affordable units, making it increasingly hard for historical communities to remain.

[146] Release of the Equitable Development Community Indicators Report in 2020 as part of the EDMP also helped inform the 2021 Racial Equity Analysis examining how the Urban Village Strategy contributed to outcomes for communities of color.

[147] The current iteration of the RSE Index can be found online at: https://maps.seattle.gov/RSEIndex.

- **Income-restricted housing**—Approximately two-thirds of all rent- and income-restricted housing in Seattle is in RSE priority areas (which are commonly also areas of high displacement risk), reflecting ongoing investment in affordable housing as an anti-displacement strategy. However, the concentration of income-restricted housing inside RSE priority areas also reflects that zoning in many other neighborhoods prohibits development at densities required for construction of income-restricted housing to be feasible.

- **Proximity to grocery stores**—At the time of analysis, several RSE priority areas in South Seattle lacked a grocery store. Populations in RSE priority areas tend to have lower incomes and fewer transportation options, which can limit access, especially when affordable or culturally relevant stores are many miles away.

- **Air pollution exposure risk**—Households in RSE priority areas face disproportionately high risks of exposure to outdoor air pollution due to proximity to industrial districts and major transportation routes.

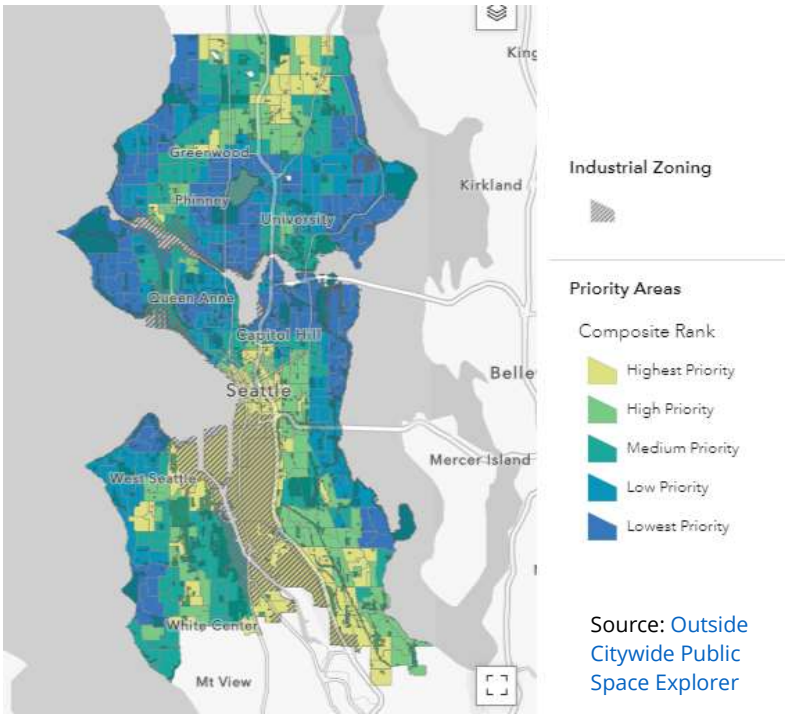
- **Access to frequent transit service**—Based on 2019 schedules, about three-quarters of households in Seattle and 80 percent in RSE priority areas were within walking distance of frequent transit service running weekdays, nights, and weekends. However, some RSE priority areas near the northern and southern city limits lacked access to this level of service. With reductions in service since 2019, areas without frequent service have likely expanded.

- **Jobs accessible by transit**—The supply of jobs accessible by transit is particularly important for equity as low-income households and people of color are disproportionately transit dependent. Housing throughout the city, including in RSE priority areas, has relatively good transit access to jobs.

- **Sidewalk coverage**—Given that low-income households and households of color are less likely than others to own a car, pedestrian infrastructure is especially important for these households. Sixty-eight percent of roads in RSE priority areas have sidewalks (on both sides of the road for arterials and one side for other roads), compared with 76 percent in Seattle overall. Neighborhoods north of 85th street, including several neighborhoods in RSE priority areas, have sparse sidewalk coverage. Neighborhoods north of 85th were part of unincorporated King County until 1954 and were largely developed without sidewalks as County standards did not require construction of sidewalks.

- **Quality of neighborhood elementary schools**—The Washington Schools Improvement Framework, an index of school performance, shows large differences among Seattle's elementary schools. While high-scoring elementary schools exist in many parts of Seattle, attendance areas for the lowest-scoring schools are all located fully or partially within RSE priority areas.

Figure A-141
Outside Citywide Prioritization Areas



Source: Outside Citywide Public Space Explorer

- **Access to Parks and Open Space**—The City's Outside Citywide Program recently inventoried public outdoor spaces and recommended priority areas for public space improvements, as shown in Figure A-142, based on an array of data. The measures included outdoor space quality and accessibility, pressure on park acreage from surrounding population, access to private yards, and 2023 RSE Index. The Outside Citywide Public Space Explorer highlights areas where outdoor public spaces could be expanded or enhanced to serve Seattle residents more equitably.[148] These areas include several neighborhoods in Southeast Seattle adjacent to I-5; South Park, and portions of other Southwest Seattle neighborhoods; much of downtown; and some parts of north Seattle.[149, 150]

The disparities between neighborhoods found in the EDMP, Outside Citywide, and other analyses summarized in this appendix have been shaped by redlining, racially restrictive covenants, and other historical practices that segregated people of color, commonly near environmental hazards,[151] and

[148] The Outside Citywide Public Space Explorer is a tool for exploring Seattle's public outdoor spaces and identifying priority areas for improvements. provides maps and details the methodology. OPCD's Outside Citywide webpage provides additional background about the overall program.

[149] Access to Parks and Open Space is one of the indicators selected for Monitoring in the EDMP and an indicator feasible to monitor on an ongoing basis is being developed.

[150] Tree canopy coverage, while not accounted for directly in the Outside Citywide is another important contributor to the quality of life in neighborhoods and to overall environmental health. The City's 2021 Tree Canopy Assessment found that RSE Priority Areas not only have less tree canopy but have also been losing tree canopy at a greater rate than has the city as a whole.

[151] **"Exposure Disparities by Income, Race and Ethnicity, and Historic Redlining Grade in the Greater Seattle Area for Ultrafine Particles and Other Air Pollutants," K Bramble, et. al. Environmental Health Perspectives. 2023,131(7), 077004, DOI: 10.1289/EHP11662.**

that underinvested in these communities. These disparities have also been perpetuated by aspects of zoning introduced in the 1900s, but still in place as of 2023.

- This includes City of Seattle zoning in the majority of the city that prohibits construction of housing at the range of densities low-income households can afford. Exclusionary zoning concentrates students of color in higher poverty schools that struggle to meet their needs. The location of multifamily housing near major roadways can help with transit access but exposes residents in these units to higher levels of air pollution. This land use pattern also results in inequitable access to large parks and open spaces that are more commonly located in neighborhoods with primarily single-family homes where yards with trees are already more abundant.
- Another example is residential neighborhood zoning that restricts large areas of the city to exclusively residential uses. This effectively prohibits many community serving amenities such as small grocery stores, cafes, and arts and culture spaces that could otherwise provide walkable access to fresh produce, services, and gathering spaces near people's homes.

Housing with Access to Transit

Having housing and jobs with direct access to high-capacity transit allows for Seattle to reduce total vehicle miles travelled in cars, reduce GHG emissions, reduce traffic, and improve access to areas of the city that are more difficult to travel to for households without vehicles.

The King County Countywide Planning Policies require that cities conduct several housing analyses with regards to ½ mile proximity to High-Capacity Transit (HCT) and Frequent Transit. This section of the Housing Appendix addresses these requirements with analysis of proximity to transit for existing housing units, income-restricted housing units, recently developed housing units, and for our housing unit development capacity.

Figure A-143 shows HCT walksheds measured to one-half mile of bus rapid transit, monorail, light rail, and commuter rail stations in Seattle. HCT walksheds cover approximately 16,100 acres, or around 30 percent of Seattle's total land area. Furthermore, Figure A-143 shows Frequent Transit walksheds, which include the HCT walksheds as well as walksheds for additional transit options with frequent service.[152] Frequent Transit walksheds cover approximately 36,800 acres, or about 69 percent of Seattle's total land area.

A majority (55%) of Seattle's existing housing units are within a half-mile walk of HCT, as shown in Figure A-144. About 73 percent of flats and 55 percent of townhomes are within HCT walksheds. However, majorities of both detached housing units and duplexes, triplexes and fourplexes are outside of HCT walksheds. Outside of these walksheds are 72 percent of detached units and 59 percent of small multiplexes.

Approximately 90 percent of housing units are within a half-mile walk of Frequent Transit. Ninety-five percent of flats and 92 percent of townhomes are within Frequent Transit walksheds. In addition, majorities of both detached housing units (77 percent) and duplexes, triplexes and fourplexes (77 percent) are inside of Frequent Transit walksheds.

[152] Existing frequent transit service is identified by Seattle Department of Transportation, August 2023. Walksheds are generated by OPCD based on the center of the platform of existing and future high-capacity transit stations, using distance along a connected network of streets, trails, or stairs where the streets are not limited-access (i.e., highways or freeways). Frequent Transit walksheds include HCT walksheds, and also include frequent bus service.

SDOT maintains a Frequent Transit Network webpage as part of its Transit Master Plan.

Figure A-142
Half-Mile Transit Walksheds Analyzed in this Housing Appendix

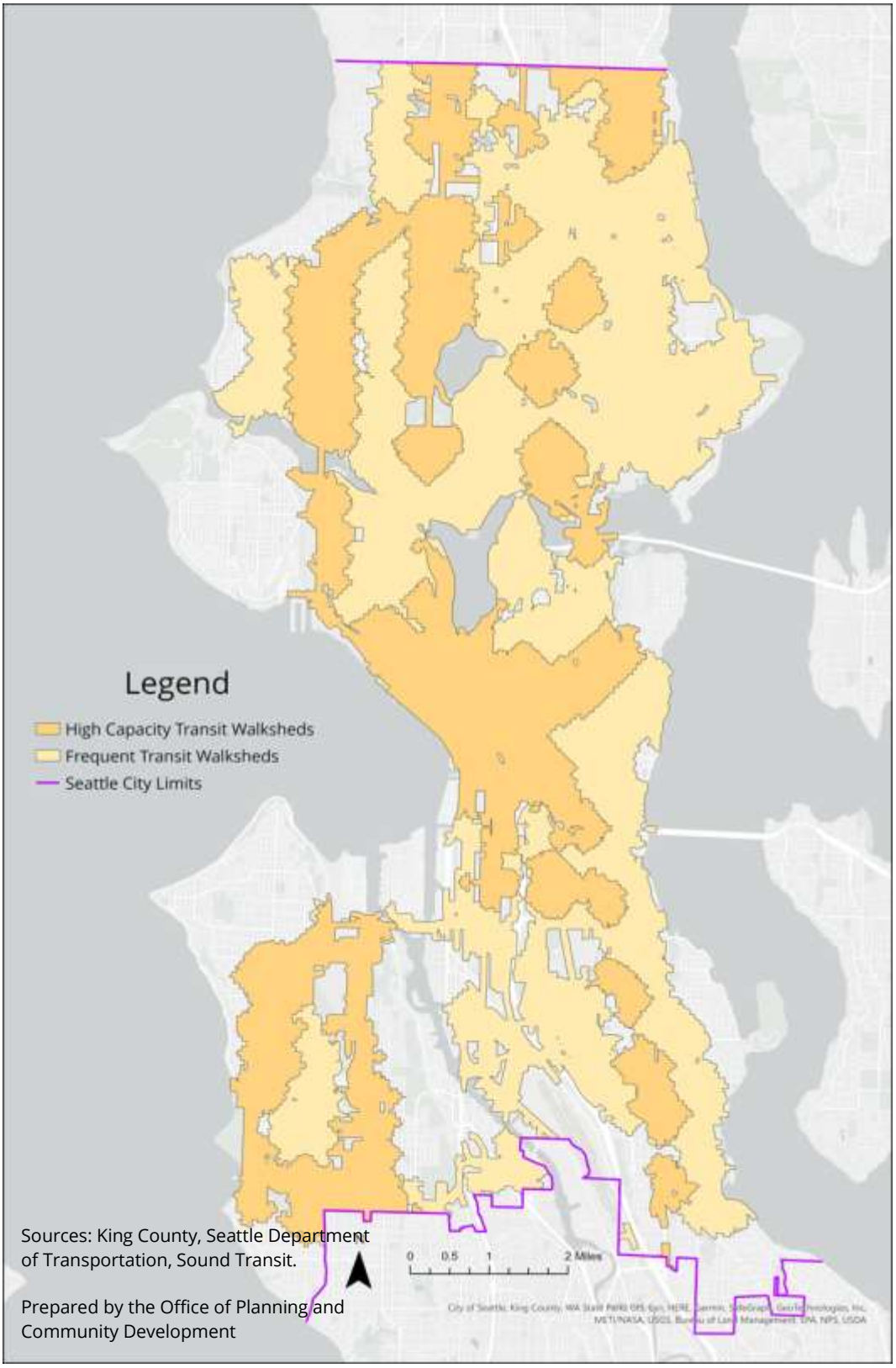


Figure A-143
Existing Housing Supply and Transit Walksheds

	High-Capacity Transit			Frequent Transit		
Housing Type	Outside Walkshed	Inside Walkshed	**Total (Units/ Residences)**	Outside Walkshed	Inside Walkshed	**Total (Units/ Residences)**
Flat	55,462 (27%)	151,746 (73%)	207,208	9,593 (5%)	197,615 (95%)	207,208
Townhouse	13,750 (45%)	16,905 (55%)	30,655	2,315 (8%)	28,340 (92%)	30,655
Live & Work	424 (38%)	683 (62%)	1,107	73 (7%)	1,034 (93%)	1,107
Duplex, Triplex & Fourplex	7,297 (59%)	5,156 (41%)	12,453	1,252 (10%)	11,201(90%)	12,453
Detached	96,991 (72%)	37,292 (28%)	134,283	30,565 (23%)	103,718 (77%)	134,283
Total Units	**173,924 (45%)**	**211,782 (55%)**	**385,706**	**43,798 (11%)**	**341,908 (89%)**	**385,706**
Congregate	8,429 (39%)	12,943 (61%)	21,372	1,027 (5%)	20,345 (95%)	21,372

Source: King County Department of Assessments, compiled by City of Seattle, July 2022; King County Metro.

Figure A-145 further looks at existing income-restricted units by these walksheds. More than 70 percent of Seattle's income-restricted rental units and 60 percent of income-restricted owner units are located within a half mile walk of HCT walksheds. Nearly all income-restricted units are within a half-mile walk of Frequent Transit walksheds.

Figure A-144
Income-Restricted units and Transit Walksheds

	High-Capacity Transit			Frequent Transit		
Housing Type	Outside Walkshed	Inside Walkshed	**Total (Units)**	Outside Walkshed	Inside Walkshed	**Total (Units)**
0 to 30% AMI	3,700 (28%)	9,400 (71%)	13,200	200 (2%)	12,900 (98%)	13,200
31 to 50% AMI	1,700 (28%)	4,400 (72%)	6,100	300 (5%)	5,800 (95%)	6,100
51 to 80% AMI	3,400 (24%)	10,450 (76%)	13,900	200 (1%)	13,650 (98%)	13,900
Above 80% AMI	100 (13%)	700 (87%)	800	0 (%)	800 (100%)	800
Total	**8,900 (26%)**	**24,950 (74%)**	**34,000**	**700 (2%)**	**33,150 (98%)**	**34,000**
Owner Units	100 (40%)	150 (60%)	250	0 (%)	250 (100%)	250

Source: King County Metro. City of Seattle Office of Planning & Community Development; King County Income-restricted Housing Database, which the King County Department of Community and Human Services developed in collaboration with Seattle, other cities, and the Puget Sound Regional Council.

Note: Estimates are rounded to the nearest 50. Approximately 100 units serving households 0 to 30% of AMI and 50 units serving households 51 to 80% of AMI could not be geocoded for this analysis but are included in totals.

Housing development during the 2016 to 2022 period was largely concentrated in areas served by HCT and Frequent Transit, as shown in Figure A-146. Seventy-five percent of units developed during this period were within HCT walksheds. Units in mixed-use and multifamily buildings, which include flats, townhouses, and small multiplexes, were highly concentrated in HCT walksheds. Eighty-four percent of units in mixed-use buildings were developed in HCT walksheds, and 62 percent of units in multifamily buildings were. In contrast, new detached housing was primarily developed outside of HCT walksheds. Similarly, AADUs and DADUs, which can be built on the same lots as detached homes and townhomes throughout much of the city, were developed mostly in areas outside of ½ mile HCT walksheds.

Ninety-seven percent of units developed during this period were within Frequent Transit walksheds. Nearly all units in mixed-use and multifamily buildings were within Frequent Transit walksheds, while other forms were slightly less concentrated in Frequent Transit walksheds.

Figure A-145
Recently Developed Units and Transit Walksheds

Housing Type	High-Capacity Transit			Frequent Transit		
	Outside Walkshed	Inside Walkshed	**Total (Units/ Residences)**	Outside Walkshed	Inside Walkshed	**Total (Units/ Residences)**
Detached Unit	2,451 (61%)	1,548 (39%)	3,999	745 (19%)	3,254 (81%)	3,999
AADU	759 (71%)	312 (29%)	1,071	190 (18%)	881 (82%)	1,071
DADU	748 (68%)	354 (32%)	1,102	183 (17%)	919 (83%)	1,102
Multifamily	4,446 (38%)	7,259 (62%)	11,705	506 (4%)	11,199 (96%)	11,705
Mixed-Use	7,229 (16%)	37,625 (84%)	44,854	513 (1%)	44,341 (99%)	44,854
Institutional, Industrial or Other	6 (75%)	2 (25%)	8	2 (25%)	6 (75%)	8
Total Units	**15,639 (25%)**	**47,100 (75%)**	**62,739**	**2,139 (3%)**	**60,600 (97%)**	**62,739**
Congregate	510 (17%)	2,561 (83%)	3,071	0 (0%)	3,071 (100%)	3,071
Source: King County Metro; City of Seattle Quarterly Housing Report Dashboard as of April 10, 2023						

Remaining development capacity for additional housing units is also concentrated in HCT and Frequent Transit walksheds. As of the time of this analysis, 77 percent of unit capacity (125,000 units) and about half of the overall redevelopable parcel area (2,100 acres) is within a half mile walkshed of an HCT station. Figure A-147 further shows that 96 percent of unit capacity (159,000 units) and 83 percent of redevelopable parcel area (3,400 acres) is within a Frequent Transit walkshed. This is a result of zones within a one-half mile walkshed of transit typically allowing for notably higher densities than those outside of high-capacity transit walksheds.

Figure A-146
Residential Development Capacity and Transit Walksheds

Measure	High-Capacity Transit			Frequent Transit		
	Outside Walkshed	Inside Walkshed	**Total**	Outside Walkshed	Inside Walkshed	**Total**
Capacity (Units)	38,442 (24%)	124,805 (76%)	163,247	4,476 (4%)	158,771 (96%)	163,247
Parcel Area (Acres):						
Total Area	24,604 (64%)	13,930 (36%)	38,534	8,787 (23%)	29,747 (77%)	38,534
Area Vacant or Redevelopable	2,075 (50%)	2,086 (50%)	4,161	725 (17%)	3,436 (83%)	4,161
Source: City of Seattle Quarterly Housing Report Dashboard as of April 10, 2023						

Displacement

As strengthened by HB 1220, GMA requires that a comprehensive plan identify factors that contribute to displacement to inform establishment of anti-displacement policies, with particular consideration given to the preservation of historical and cultural communities. Analysis is also required to identify areas that may be at higher risk of displacement from market forces, including those associated with zoning changes and capital investments.

Prevalence and Demographics of Displacement

Severe housing cost burden places households at increased risk of displacement. Households in the lowest income categories, renter households, and households of color disproportionately shoulder severe housing cost burdens. By race and ethnicity, the highest rates of severe housing cost burden are among Black households and Native American households.

Renters tend to face heightened vulnerability to displacement since they have less control over their housing status and can experience large and sudden rent increases that force them to relocate or make other sacrifices, including deferring on saving towards homeownership. Most households (54%) in Seattle rent, but nearly two-thirds of households of color are renters.

Owning one's home can increase household stability over renting, and in gentrifying neighborhoods, homeowners are about half as likely to be displaced as are renters.[153] Homeownership, especially permanently affordable homeownership, can be a bulwark against market pressures and, like income-restricted rental housing, offers stability, predictability, and a range of better outcomes in health, education, and well-being. Black, Native American, and Hispanic households have far lower rates of homeownership than white households.

Given the escalating prices of ownership housing options, many Seattle-area households lack the income and savings needed to purchase a home. This relegates these households to renting, where despite tenant protections adopted and strengthened locally in recent years renters remain vulnerable to price increases that lead to economic displacement. For families with children and multigenerational households unable to afford homeownership, many of whom are families of color and immigrant households, affordable and suitable rental housing is scarce. Less than 10 percent of apartment units across the market have two or more bedrooms and are affordable to households

[153] Martin, I. W., and K. Beck. 2018. Gentrification, property tax limitation, and displacement, Urban Affairs Review, 54(1), 33-73.

with incomes at or below 80% of AMI, though larger units affordable to low-income families are more common within publicly funded housing.[154]

The Puget Sound Regional Council Household Travel Survey asks households who said they moved in the last 5 years why they relocated. Figure A-148 summarizes responses. About 24 percent of surveyed households who moved within the region did so for one or more displacement-related reasons; at 27 percent, the share was somewhat higher for those who left Seattle. In both cases, rising housing costs was the most common displacement-reason. The survey found that people of color who moved cited all four displacement-related reasons more commonly than white movers did.

Figure A-147
Reason(s) for Moving from Previous Home

	Percent among households who:	
	Moved within region	Moved from Seattle to some other place within region
One or more displacement related reason(s):	**24.0%**	**27.4%**
Could no longer afford housing costs of previous home due to increase in housing costs	16.0%	16.6%
Forced (e.g., evicted, foreclosure, building demolition)	4.8%	6.0%
Could no longer afford housing costs of previous home due to change in household income or finances	4.3%	8.7%
Friends, family, or cultural community leaving area	2.1%	1.8%

Source: Puget Sound Regional Household Travel Survey (2019)
Notes: The question about reasons for moving from one's previous home was asked of households who moved within the past five years. The data shown are limited to households who moved within the region.

Other research on moves in King County found that residents of low socioeconomic status (SES) who moved in the wake of the Great Recession tended to move to neighborhoods with substantially lower life expectancy.[155] Overall rates of moving, however, were lower for low-SES residents than for

[154] OPCD estimates based on data from CoStar Group, www.costar.com.
[155] Hwang, Jackelyn, Bina P. Shrimali, Daniel C. Casey, Kimberly M. Tippens, Maxine K. Wright, Kirsten Wysen, 2022. "Who Moved and Where Did They Go? An analysis of residential moving patterns in King County, WA between 2002–2017." Federal Reserve Bank of San Francisco Community Development Research Brief 2023-01. doi: 10.24148/cdrb2023-01.

moderate- and middle-SES households, a finding that prompted the researchers to emphasize the importance of supports to protect low-SES households from displacement.[156]

Legacy of Institutionalized Racism and Shifts in Communities of Color

In their report, "Systematic Inequality: Displacement, Exclusion, and Segregation," researchers at the Center for American Progress describe how a legacy of institutionalized racism including redlining set the stage for recent and ongoing displacement of communities of color. For decades after World War II, development of predominantly white suburbs was subsidized with housing finance and highway systems that disproportionately benefited white middle class and affluent households.

Then, in more recent decades, neighborhoods close to prosperous regional job centers, including neighborhoods in previously redlined areas, grew in popularity with middle class and higher income households. Increased demand for housing near job centers resulted in many underinvested, previously redlined urban neighborhoods becoming too expensive for the resident communities of color who had been excluded from other neighborhoods due to discriminatory policies and practices. This pattern, and the accompanying "suburbanization of poverty," has played out in many communities including in our own region.[157]

The population of color has risen much faster in the rest of King County than in Seattle. Several Seattle neighborhoods have also seen net population declines among racial and ethnic groups that previously comprised majorities or large shares of neighborhood populations. For example, from 2010 to 2020 the decennial census counts of Black residents in the Central Area, Madrona/Leschi, and Rainier Beach; Asian residents in Beacon Hill and in North Beacon Hill/Jefferson Park; and Hispanic/Latino residents in South Park saw substantial declines. For some of these neighborhoods, the loss between 2010 and 2020 is part of a multi-decade trend.

Most dramatic is the loss of the Black population in the Central Area. Maps by the Civil Rights and Labor History Consortium[158] show that in 1970, Black people comprised a large majority of residents

[156] The authors of the study also note that national research has also demonstrated that a lack of financial resources needed to move can also render households in low-SES groups stuck in areas of concentrated poverty regardless of whether or not these households wish to remain in place.

[157] This process is described in Systemic Inequality: Displacement, Exclusion, and Segregation: How America's Housing System Undermines Wealth Building in Communities of Color," by authors Danyelle Solomon, Connor Maxwell, and Abril Castro at the Center for American Progress, published Aug 7, 2019. For more on the suburbanization of poverty, see The changing geography of US poverty, Brookings Institution, 2017.

[158] See Seattle's Race and Segregation Story in Maps 1920-2020 compiled by the Civil Rights and Labor History Consortium at the University of Washington.

in the Central District. As of 2020, Black residents make up only about 13 percent of neighborhood residents in Seattle's Central District.[159]

The census data available do not allow us to measure the specific extent to which displacement has contributed to these regional and neighborhood trends. However, the combination of quantitative data and documentation of the lived experience of households strongly supports a finding that many households of color from Seattle's cultural communities have been displaced from Seattle over time due to rising housing costs.

Neighborhoods at Greatest Risk of Displacement as Growth Occurs

In 2016, the Office of Planning & Community Development created and published the displacement risk index in its *Growth & Equity* report as part of the Seattle 2035 Comprehensive Plan. The displacement risk index identifies areas of Seattle where displacement of people of color, low-income people, renters, and other populations susceptible to displacement may be more likely, especially over the long term. It combines demographic, place-based, and market data to provide a longer-term view of displacement risk based on neighborhood characteristics like the presence of vulnerable populations and amenities that tend to increase real estate demand. The displacement risk index represents a snapshot in time that identifies where displacement of marginalized populations may be more likely to occur as growth unfolds over the medium- to long-term at a neighborhood scale. Other measures and indicators, which the City also monitors and is updating as a tool to guide anti-displacement programs and actions, provide information about where displacement has occurred in the recent past or is likely to be occur in the near future.

Shown in Figure A-149, the displacement risk index informs the City's growth strategy and anti-displacement strategies. In 2022, OPCD updated the index in two ways. First, we updated the individual factors with the most current data available. Second, we made a few methodological improvements based on community input and best practices. The updated displacement risk index presents a similar overall pattern as the 2016 version, with the areas at greatest risk in southeast Seattle, South Park and Westwood–Highland Park, the Chinatown–International District, the University District,[160] and parts of north-end neighborhoods like Northgate and Lake City. For more discussion of the methodology and findings of the displacement risk index, see the Anti-Displacement Framework that accompanies the Plan.

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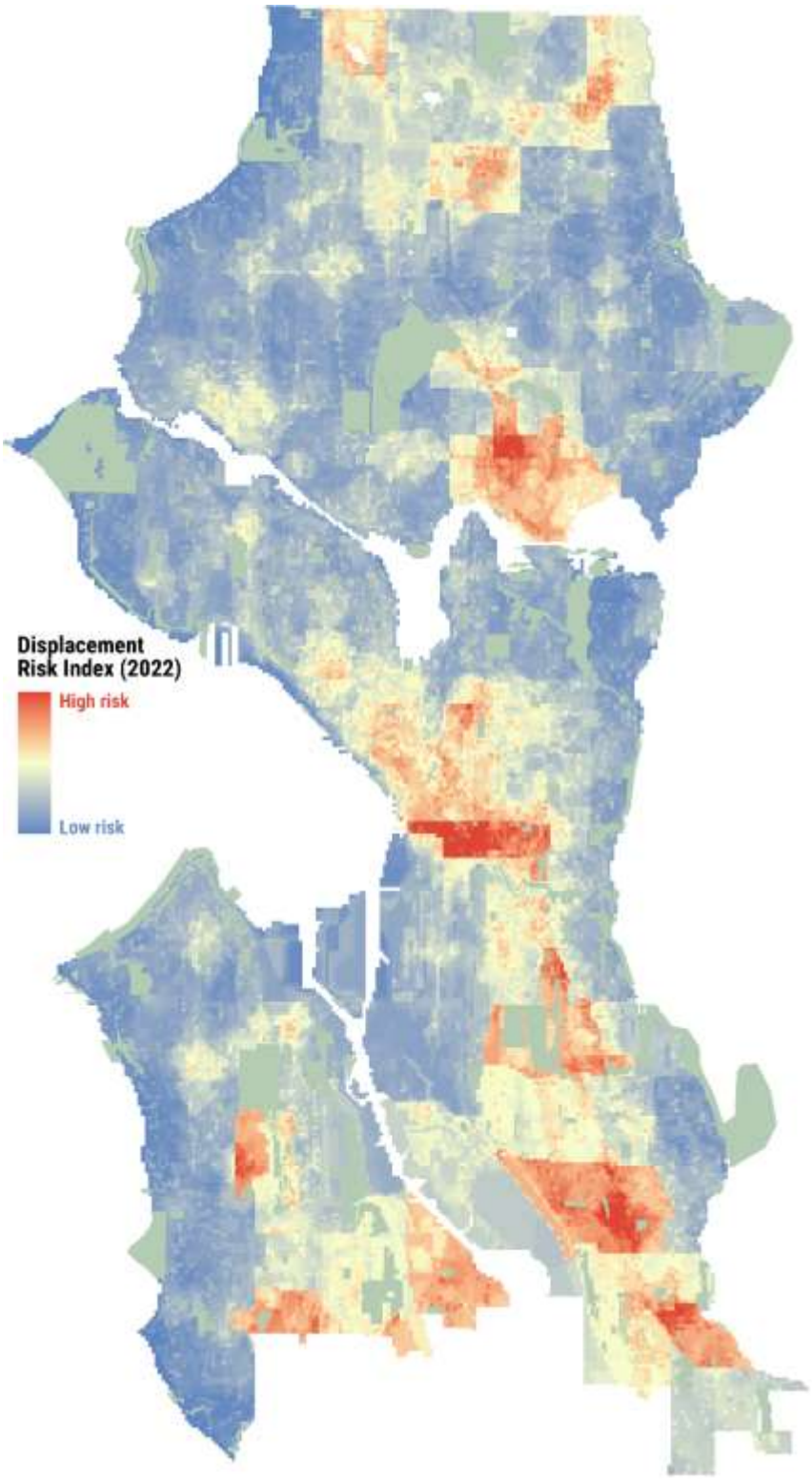
[159] Decennial Census data tabulated for the Central Area/Squire Park Community Reporting Area by Seattle's Office of Planning & Community Development.

[160] The University District has relatively high risk but should considered carefully, as demographic data for student populations is often less reliable, and their comparatively lower incomes may not necessarily indicate the same degree of risk as it does elsewhere.

Figure A-148
Displacement Risk Index



Source: City of Seattle Anti-Displacement Framework, 2024

Appendix 3
Capital Facilities

The Capital Facilities Appendix includes GMA required information about the location and capacity of all existing and proposed capital facilities -fire, police, parks and recreation, libraries, and schools. Information about capital facilities for utilities, such as drinking water, drainage and sewer, solid waste, and electricity, is included in the Utilities Appendix. Information about transportation facilities is included in the Transportation Appendix.

The City plans for capital facilities to preserve and maintain existing infrastructure, and build new facilities to support expected population and job growth. Capital facility investments by the City contribute to local economic vitality, quality of life, safety, and climate mitigation.

In some cases the required inventories, level of service and future needs are detailed in the City's functional plans or in plans prepared by other public entities. References to these plans are included where relied on.

The requirement for a 6-year plan that will finance City-owned capital facilities and identify sources of funding is provided in the Seattle Capital Improvement Program (CIP) which is updated as part of the City's annual budget process. The CIP has detailed information about proposed capital projects, including the proposed locations of expanded or new capital facilities and a six-year plan for financing these improvements.

Fire Department

The Seattle Fire Department (SFD) provides fire and rescue response, fire/EMS 911 services, fire prevention and public education, fire investigation, and emergency medical services throughout the city. Emergency medical services include basic life support and advanced life support. SFD also has specially trained technical teams that provide technical and heavy rescue, dive rescue, tunnel rescue, marine fire/EMS response, and hazardous materials response. SFD also provides mutual aid response to neighboring jurisdictions.

In addition, SFD officers and firefighters are members of local and national disaster response teams such as the Federal Emergency Management Agency (FEMA)'s Urban Search and Rescue Task Force and wildland firefighting. SFD's fire prevention efforts include fire code enforcement, building inspections, plan reviews of fire and life safety systems, public education and fire safety programs, regulation of hazardous materials storage and processes, and regulation of places of public assembly and public events to ensure life safety.

SFD has a strong record of fire prevention resulting in fewer fires than the national average and of other cities with similar populations. Seattle averages 1.4 fires annually per 1,000 residents, which is significantly lower than the national average of 4.5. Over the past five years, the average number of total structure fires per year in Seattle has been 1,025. Total fire dollar loss averaged $19.6 million per year.

SFD provides emergency medical responses, which account for approximately 74% of all SFD emergency calls in Seattle. To respond to the emergency medical demand, all Seattle firefighters are trained as emergency medical technicians (EMTs) to provide basic emergency medical care or basic life support.

SFD’s Mobile Integrated Health program reduces non-emergency calls to the 911 system and provides improved service and care to individuals with non-emergent needs. The program includes the Health One multidisciplinary response team of firefighters and case managers to respond to individuals immediately in their moment of need and help them navigate the situation - whether they need medical care, mental health care, shelter, or other social services. Currently, core activities of Mobile Integrated Health are high utilizer intervention (individuals and locations), low acuity data and trend analysis, establishing referral partnerships, and alternate treatment/transportation services.

Inventory

SFD provides emergency response services through five battalions consisting of 33 fire stations (plus Battalion 3/Medic One at Harborview Medical Center) strategically placed around the city to maximize coverage and minimize response time. SFD headquarters is located in an historic, earthquake-vulnerable building in Pioneer Square. Each station provides a full range of fire protective services including fire suppression, emergency medical, and rescue. Each station is

equipped with at least one fire engine. Many stations include other equipment and special units. SFD has thirty-two engine companies, twelve ladder truck companies, five fire boats, seven aid units, eight paramedic units, and other specialized units including heavy rescue, hazardous materials, a 911 center, and tunnel rescue that provide a broad range of emergency services. In addition, SFD shares a Joint Training Facility with Seattle Public Utilities. The general locations of existing SFD facilities are mapped in Figure A-150 and listed in Figure A-151.

Staffing

All fire stations are staffed 24 hours a day, seven days a week, by four separate shifts of firefighters. There are 216 members responding to emergencies every day across the city (220 with upstaffing for 2 daytime aid cars). In 2024, SFD had 987 uniformed personnel and 88 civilian personnel. Uniform personnel include 932 firefighter/EMTs (including chiefs) and 55 firefighter/paramedics.

Planning Goals

SFD evaluates emergency medical capabilities and staffing, or equipment additions and institutes operation changes each year as a part of the budget process. State law requires that fire departments report yearly on established emergency response standards. Response time is influenced directly by the availability of fire personnel, equipment, traffic conditions, and the number and location of fire stations. Firefighter and equipment requirements indirectly affect station requirements. SFD reports response time for fire response and emergency medical services (EMS), which includes basic life support (BLS) and advanced life support (ALS). Response standards are:

- Call Processing Time: Call answering time (<= 15 seconds) and Incident dispatching time (<= 60 seconds) for 90 percent of calls.
- Fire Response Time: 5:20 (<= 80 second turnout time + 4:00 travel time) with a goal of arriving on scene 90% in under 5:20.
- Basic Life Support: BLS EMS response time is 5:0 (<= 60 seconds turnout time + <= 4:00 for travel) with a goal of arriving on scene 90% in under 5:00 .
- Advanced Life Support: ALS EMS response time is 9:00 (<= 60 seconds turnout time + <= 8:00 for travel), with a goal of arriving on scene 90% in under 9:00.
- The City plans for asset preservation of SFD facilities through a capital maintenance program. Minor and major capital facility projects are programmed in the City's six-year CIP.

Future Needs

Between 2003 and 2019, the City upgraded, renovated or replaced 32 neighborhood fire stations and other facilities as part of the $167 million 2003 Fire Facilities levy, prompted by structural deficiencies identified during and following the 2001 Seattle-area Nisqually earthquake. Currently,

the City of Seattle is constructing a new Fire Station 31, a 22,000 square foot station located in North Seattle, slated to be completed in late 2025 to replace an older station on Northgate Way. The new three-story station has four apparatus bays and space for a Health One unit. The new site is designed to meet the growing operational needs of Seattle Fire and the response times of the growing North Seattle community. Currently, no additional lands have been identified for SFD purposes.

In addition to SFD facilities included in the CIP, there are a number of prospective SFD capital projects that the City may undertake or fund over the next 20 years:

Replace Fire Station No. 3 at Fisherman's Terminal

Construct a new fresh-water marine and land-based fire suppression facility, preferably in the South Lake Union area

Replace or expand the commissary and fire garage

Replace SFD Headquarters, to include facility space inclusive of Fire Marshal office

Expand the Joint Training Facility

Replace fireboat Chief Seattle

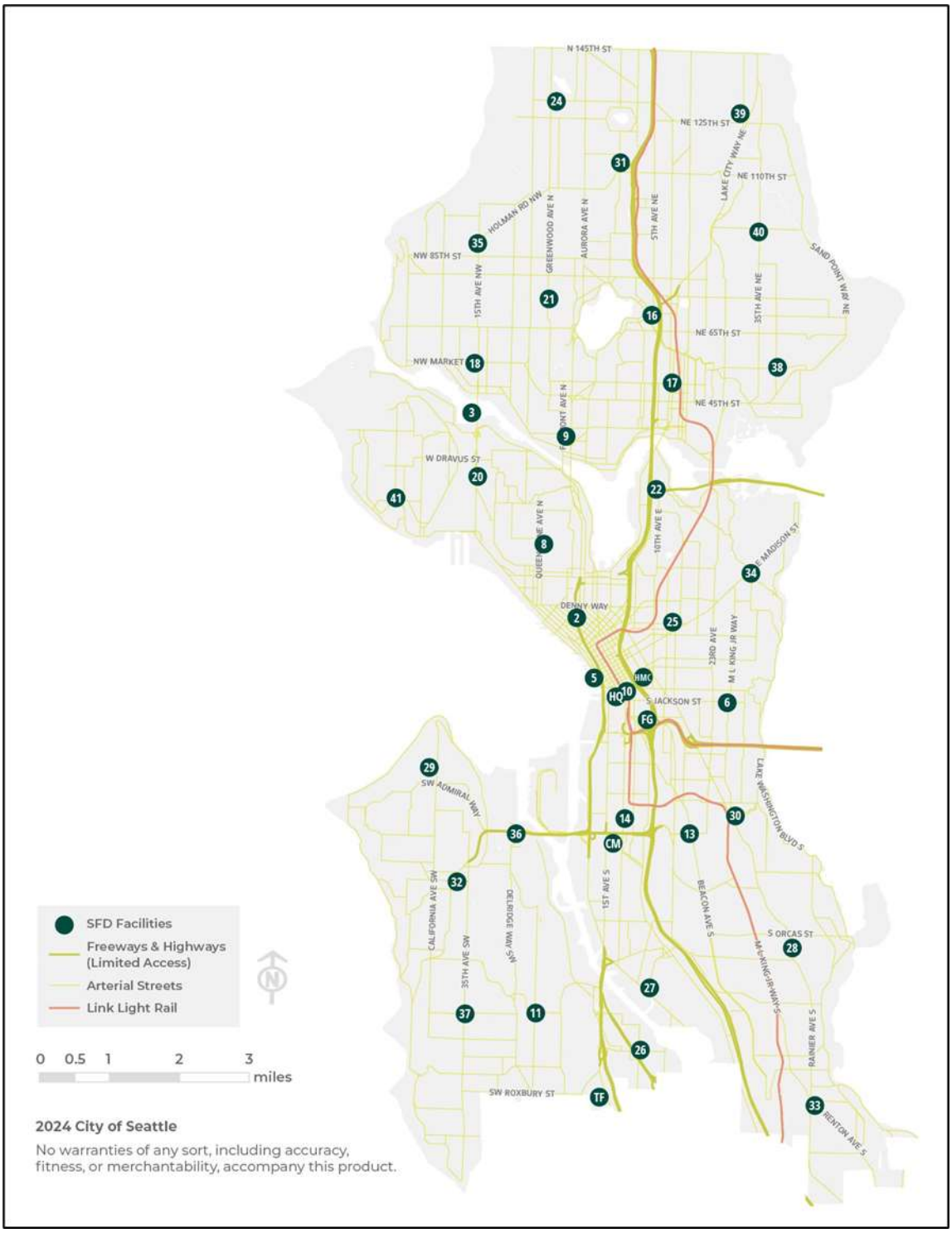
Retrofit fireboat Alki

Construct a north-end training facility (Magnuson Park area)

Remodel select fire stations to accommodate increased staffing/apparatus based on growth

Electrify SFD apparatus fleet of fire engines and ladder trucks; this would require an accelerated replacement schedule and additional vehicle cost would necessitate going through capital development

Figure A-149
Map of Seattle Fire Department (SFD) Facilities



Source: OPCD 2024

Figure A-150
Table of Seattle Fire Department (SFD) Facilities

Facility Name	Map Reference	Year Built	Size (sq. ft.)	Address	Equipment
Headquarters*	HQ	1929	55,952	301 2nd Ave S	
Fire Station 2*	2	1922	37,740	2334 4th Ave	Engine 2, Ladder 4, Aid 2, Aid 4, Hose 2
Fire Station 3	3	1989	2,760	1735 W Thurman	Fireboat Chief Seattle, Fireboat 1
Fire Station 5*	5	1963	5,688	955 Alaskan Way	Engine 5, Fireboat Leschi, Fireboat 2, Rescue Boat 5, PT520
Fire Station 6	6	2012	11,003	405 Martin Luther King Jr Way S	Engine 6, Ladder 3
Fire Station 8	8	1964	5,450	110 Lee St	Engine 8, Ladder 6.
Fire Station 9	9	2013	8,804	3829 Linden Ave N	Engine 9.
Fire Station 10 Fire Alarm Control	10	2006	61,156	400 S Washington St 105 5th Ave S	Engine 10, Ladder 1, Aid 10, Aid 5, Staff 10, Hazardous Materials Team
Fire Station 11	11	1971	5,610	1514 SW Holden St	Engine 11.
Fire Station 13*	13	1927	4,329	3601 Beacon Ave S	Engine 13, Battalion 5
Fire Station 14*	14	1922	16,831	3224 4th Ave S	Ladder 7, Aid 14, Rescue One

Facility Name	Map Reference	Year Built	Size (sq. ft.)	Address	Equipment
Fire Station 16*	16	1927	3,995	6846 Oswego Pl NE	Engine 16
Fire Station 17*	17	1929	23,537	1050 NE 50th St	Engine 17, Ladder 9, Medic 17, Battalion 6
Fire Station 18	18	1974	16,624	1521 NW Market St	Engine 18, Ladder 8, Medic 18, Hose 18, Battalion 4, Hose 18
Fire Station 20	20	2014	6,229	2800 15th Ave W	Engine 20
Fire Station 21	21	2011	8,783	7304 Greenwood Ave N	Engine 21, MCI 1
Fire Station 22	22	1965	4,110	901 E Roanoke St	Engine 22, Command and Communications Van
Fire Station 24	24	1977	3,630	401 N 130TH St	Engine 24, Air 240
Fire Station 25	25	1969	20,824	1300 E Pine St	Engine 25, Ladder 10, Aid 25, Battalion 2
Fire Station 26	26	1973	5,960	800 S Cloverdale St	Engine 26, Medic 26
Fire Station 27	27	1970	5,960	1000 S Myrtle St	Engine 27, REHAB1, DECON1
Fire Station 28	28	2008	13,638	5968 Rainer Ave S	Engine 28, Ladder 12, Medic 28

Facility Name	Map Reference	Year Built	Size (sq. ft.)	Address	Equipment
Fire Station 29	29	1970	5,049	2139 Ferry Ave SW	Engine 29
Fire Station 30	30	2009	9,100	2931 S Mount Baker Blvd	Engine 30, Air 9
Fire Station 31	31	To be completed in 2025	20,000	11302 Meridian Ave N	Engine 31 (FS 17); Ladder 5 (FS 39); Aid 31 (FS 24) and Medic 31 (FS 35
Fire Station 32	32	2017	6.646	3715 SW Alaska St	Engine 32, Ladder 11, Medic 32, Battalion 7
Fire Station 33	33	1971	5,061	9645 Renton Ave S	Engine 33
Fire Station 34	34	1971	4,625	633 32nd Ave E	Engine 34, Hose 34
Fire Station 35	35	2009	11,532	8729 15th Ave NW	Engine 35
Fire Station 36	36	1900	4,676	3600 23rd Ave SW	Engine 36, Marine 1
Fire Station 37	37	2010	9,000	7700 35th Ave SW	Engine 37, Ladder 13
Fire Station 38	38	2010	8,700	4004 NE 55th St	Engine 38
Fire Station 39	39	2010	9,593	2806 NE 127th St	Engine 39
Fire Station 40	40	1965	6,500	9401 35th Ave NE	Engine 40
Fire Station 41	41	1936	6,146	2416 34th Ave W	Engine 41
Commissary	CM	1936	37,606	2416 34th Ave W	

Facility Name	Map Reference	Year Built	Size (sq. ft.)	Address	Equipment
Fire Garage	FG	1950	15,000	815 S Dearborn St	
Harborview Medical Center	HMC	1931	1,000	325 9th Ave	Medic 1, Medic 10, Medic 44, Battalion 3
Joint Training Facility	TF	2005	53,402	9401 Myers Way S	
Fire Marshall	n/a	1905	9,462	220 3rd Ave S	

*indicates a historic building
Source: OPCD 2024

Police Department

The Seattle Police Department (SPD) currently provides police protection services to the city. Its primary duties include emergency response, foot, car, and bike patrols, criminal investigations, traffic and parking enforcement, homeland security, special event safety and security, and specialty response services such as Special Weapons and Tactics (SWAT), arson/bomb, harbor patrol, and canine. The 911 Communications Center was previously part of SPD but is now a standalone department, Seattle Community Assisted Response and Engagement (CARE).

Inventory

The Department is divided into five precincts, each with a police station that serves as the base of operations for that patrol area. Detectives in centralized investigative units located at SPD headquarters downtown and elsewhere conduct follow-up investigations into violent and property crimes, and other types of crimes. Other parts of the department function to train, equip, and provide policy guidance, human resources, and employee support services to those delivering direct services to the public. The Harbor Patrol Unit covers fifty-nine square miles of waterways. The general locations of existing SPD facilities are mapped in Figure A-153 and listed in Figure A-154.

Staffing

SPD currently has 1,019 commissioned officers split between precincts, headquarters, and support facilities. Approximately 50% of commissioned officers work out of a police precinct. From 2017 to 2024, the total number of commissioned officers decreased from a high of 1,424 officers at the end of 2017 to a low of 1,012 officers in 2024. However, an increase in police hires in Q4 2024 coupled with a notable decline in officer separations in the same year resulted in a net gain in police officers for the first time since 2019. The department expects police staffing levels to continue to rise in 2025. SPD also employs nearly 500 non-sworn employees. Figure A-152 shows staffing and building capacity for the five precincts.

Figure A-151
SPD Precinct Staffing Levels

	North Precinct	**West Precinct**	**East Precinct**	**Southwest Precinct**	**South Precinct**
Officers	134	148	121	70	92
Other Staff	9	10	8	8	8
Total Staff	143	158	129	78	100

Capacity of the building to house total staff	93%	71%	70%	60%	81%

Source: Police Employee Data System; Patrol Staffing Tables, 1/7/2025

Planning Goals

Precinct-based patrol officers who respond to emergency calls for service are generally allocated based on workload, time, and location. Patrol officers are assigned to one of the five precincts and typically respond to calls for service within the precinct area. Patrol officers begin and end each shift at their assigned precinct. The patrol workload is measured using calls for service data, which includes 911 emergency calls, police on-views, and administrative time. Other performance metrics, such as response time, also inform patrol staffing needs. The precinct boundary areas are occasionally redrawn to balance workload across sectors or better align with neighborhood designations. Long-term staff planning is ongoing and addressed as needed in the City's biennial budget process. Police hiring is continuous to achieve police staffing targets above attrition. Because of the many variables that affect staffing and space objectives, SPD does not apply a single level-of-service for planning of police facilities.

Future Needs

The City plans for asset preservation of SPD facilities through a capital maintenance program. Minor and major capital facility projects are programmed in the City's six-year CIP. The current CIP includes several projects to extend the operational life of the following SPD facilities: East Precinct, North Precinct, West Precinct, Mounted Patrol Facility, Harbor Patrol Facility, and Canine Facility. The existing North Precinct does not meet the needs of precinct personnel; therefore, a new consolidated facility is proposed to be built. The City is undertaking planning for long-term facility needs as well as interim upgrades and potential expansions at the existing North Precinct and has purchased property for a new North Precinct. Currently, no additional lands have been identified for SFD purposes.

In addition to SPD facilities included in the City's CIP, there are a number of prospective SPD capital facility studies and projects that the City may undertake or fund over the next 20 years:

- New Police Training Facility
- New Joint Harbor Facility
- South Precinct Renovation
- Police Range Renovation
- Seattle Justice Center (HQ) Renovation
- Airport Way Center Renovation

- Evidence Warehouse Maintenance and Upgrade

Figure A-152
Map of Seattle Police Department (SPD) Facilities and Precinct Boundaries

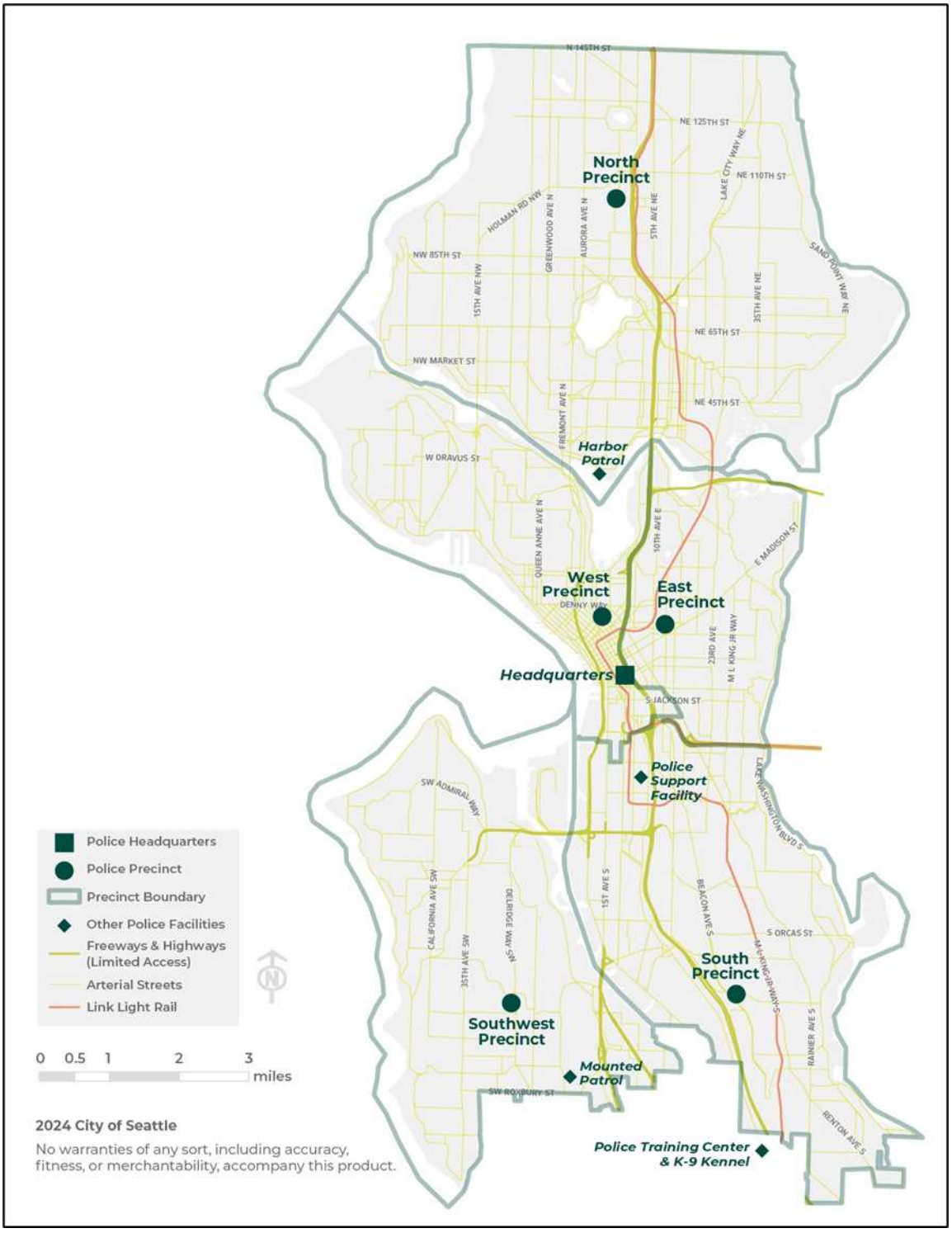


Figure A-153
Table of Seattle Police Department (SPD) Facilities

FACILITY NAME	YEAR BUILT/ UPDATED	SIZE (SQ. FT.)	DESCRIPTION	ADDRESS
Police Headquarters	2002	n/a	Police Headquarters shares Justice Center building	610 5th Avenue
North Precinct	1984	16,434	Serves the area north of the Ship Canal to the City limits	10049 College Way N
	n/a	4,474	Annex is leased office space	10303 Meridian Ave N
West Precinct	1999	50,960	Serves Queen Anne, Magnolia, South Lake Union, Downtown, Chinatown-International District	810 Virginia St
	1948	53,336	Condo garage located in adjacent building	2021 9th Ave
East Precinct	1926/ 1985	61,580	Serves the area north of I-90 to the Ship Canal and generally the area east of I-5, as well as Eastlake	1519 12th Avenue
	2014	29,058	Garage located under 12th Avenue Arts building	1624 12th Ave
South Precinct	1983	13,688	Serves area south of I-90 and east of Duwamish River	3001 S Myrtle Street
Southwest Precinct	2002	28,531	Serves West Seattle and South Park	2300 SW Webster
Harbor Patrol	1928/ 1986	3,706	Offices, shops, docks and maintenance buildings	1717 Northlake Pl
Mounted Patrol	2001	39,041	12 full-time horse stalls and related equipment	9200 8th Ave SW
Police Support Facility	1985	145,158	Located at Airport Way Center	2203 Airport Way S

FACILITY NAME	YEAR BUILT/ UPDATED	SIZE (SQ. FT.)	DESCRIPTION	ADDRESS
Police Training Center & K-9 Kennel	n/a	n/a	Practice range is an open-air range; K-9 unit dogs and pups, related equipment and supplies	11026 E Marginal Way S
Facilities not shown on map				
Professional Accountability	1970	6,300	Leased space in Pacific Building	712 3rd Ave
SPD Parking Enforcement	n/a	10,268	Leased office and warehouse	1330 N 131st St
Warehouse	n/a	5,400	Vehicle storage	923 S Bay S
Warehouse	n/a	21,800	Storage	4735 E Marginal Way S
Seattle Police Athletic Association Firing Range			Part of the range is only available to police. Located adjacent to SPD Training Center and K-9 Center.	11030 East Marginal Way

Source: OPCD 2024

Community Assisted Response and Engagement Department

The Community Assisted Response and Engagement (CARE) department, formerly known as the Community Safety and Communications Center, was established as a new department in 2021 to provide timely, accurate, and vital information to the City's first responders, city service providers, and to the public. It is home to the 911 Communications Center and the Community Crisis Responder Team. The department has continued working to establish itself as a new/independent city department, identify internal ongoing needs, and explore integrating non-uniformed and alternate resources for dispatch.

The 911 Communications Center, formerly part of the Seattle Police Department, is the largest call center in the Pacific Northwest, both by staff size and volume of calls received. The center manages approximately 900,000 calls per year including callers who need language translation services and those who are deaf or hard of hearing. The center coordinates the dispatch of police officers, fire fighters, Community Crisis Responders, and medical teams for emergency situations, as well as managing non-emergency lines. The center employs 163 employees and operates 24 hours a day, 365 days a year. In 2022, 911 data shows a response time consistently longer than one hour to these call types; the department seeks to reduce that response time and to support SPD's ability to respond to more urgent 911 calls swiftly. The vision for this team into the future is to expand to manage additional call types as deemed appropriate.

The Community Crisis Responder Team works in close collaboration with Seattle police officers to provide the community diversified responses to public safety and public health incidents in the City of Seattle. The team of behavioral health professionals responds to people experiencing non-violent mental health crises or quality of life concerns. These unarmed community responders are dual-dispatched with police to priority 3 and priority 4 person down and welfare check call types. Teams are also requested by police officers. This team currently assists in the West Precinct and East Precinct but is expected to expand to serve people citywide over time. In 2022, Seattle 911 data shows a response time consistently longer than one hour to these call types. The department seeks to reduce that response time and to support SPD's ability to respond to more urgent 911 calls swiftly. The vision for Community Crisis Responder Teams into the future is to expand to additional call types and primary dispatch without officers as appropriate.

Inventory

Currently, the department has space in a 61,156-sf facility shared with Fire Station 10, Fire Alarm Center, and the Office of Emergency Management at 400 S. Washington Street.

Staffing

CARE Department continues to develop as a new department. As of 2024 the CARE Department has 185 employees. Staffing is expected to increase to add dedicated administrative and management support for Human Resources, Finance, Accounting, Technology Integration, Public Information, Public Disclosure, a Director, and a Deputy Director. This administrative support was previously provided by the Seattle Police Department. Due to the size of the 911 Communications Center the department requires its own internal team to handle these functions.

Parks and Recreation

Seattle Parks and Recreation (SPR) stewards a thriving and diverse system of parks, natural areas, beaches, and recreation facilities. This system has a rich history extending back over 135 years and plays an important role in keeping Seattle a dynamic and connected community as the city continues to grow and change. The parks and recreation system connects Seattle's residents and visitors to nature, provides opportunities to stay healthy and improve well-being, and celebrates the vibrancy of our city.

Inventory

SPR manages a 6,478-acre park system of over 485 parks, shorelines, marine reserves, and extensive natural areas comprising about 12% of the city's land area. SPR provides athletic fields, tennis courts, play areas, specialty gardens, park boulevards, green streets, greenways, trails, and public shorelines. SPR also manages many facilities, including community centers, indoor and outdoor swimming pools, environmental education centers, small craft centers, golf courses, and skateparks. The Seattle Aquarium and Woodland Park Zoo are also owned by SPR. The general locations of existing SPR parklands are mapped in Figure A-155. City-owned parks acreage by park classification are summarized in Figure A-156. Recreation facilities by type are summarized in Figure A-157. The location of over 860 recreation facilities are mapped in the Seattle Parks and Recreation 2024 Parks and Open Space Plan (pages 24-33).

Planning Goals

SPR's capital investments are focused on new facility development and immediate facility improvements including major maintenance needs, safety issues, accessibility compliance (ADA), condition assessments, and asset life cycle planning. Between 2018 and 2023, SPR completed more than 200 studies assessing the conditions of facilities and also established developed schematic designs and cost estimates for each project.

Planned investments in the maintenance of existing facilities are provided in the CIP and updated annually according to asset management priorities and available funds. Generally, SPR analyzes and prioritizes capital projects generated in the identification stage using the priority ranking based on SPR management guidance and the City Council's "Basic Principles Underlying Strategic Capital Planning," policies established in Resolution 31203 (2010):

- Enhancing Access and Services: Improving access to the existing parks and recreation system and expanding services including ideas like activation and outdoor recreation programs, community center operations and youth development.
- Restoring Clean, Safe and Welcoming Parks and Facilities: Restoring clean, safe, and welcoming parks, including enhanced maintenance, safety and regulatory compliance, and continued focus on life-cycle asset management.

- Investing for the Future: Investing for future includes responding to climate change, building community capacity and responsiveness through grants and the equity fund, and developing new/enhancing existing parks and recreation facilities

SPR uses additional criteria to rank potential capital projects such as code requirements, life safety, facility integrity, improved operating efficiency, equity and other unique elements. SPR priorities for property acquisitions are growing regional and urban centers, habitat and natural areas, and other communities in need.

The Outside Citywide initiative is a tool for potential future open space investments that was designed by the Office of Planning and Community Development to foster equity, collaboration, and environmental justice by guiding data-informed investment strategies for Seattle's public space system. The initiative encourages collaboration across government agencies, nonprofits, and private partners, ensuring that public space investments equitably serve all residents and meet the goals outlined in Seattle's Comprehensive Plan. Outside Citywide includes a comprehensive inventory of public spaces owned by both public and private entities, consolidating data from multiple city departments, external agencies, and organizations. By mapping these assets and analyzing factors such as access to public space amenities, public space pressure, and equity, the initiative helps identify priority areas for new investments. These priority areas reflect communities where there are both historical disparities in public space distribution and those which face ongoing environmental challenges, targeting public space investments where they are most critical across Seattle. OPCD maintains the Outside Citywide website and map as a tool for use by other departments, including Seattle Parks and Recreation and Seattle Public Utilities. This information is available at the Outside Citywide Public Space Explorer.

Future Needs

As Seattle increases in population and its demographic make-up changes, it is important to continue to provide a park and recreation system that reflects the demands and needs for these services. To determine the demand and need for parks and open space as part of the 2024 Park and Open Space Plan, multiple sources were examined and analyzed including past surveys of park visitors and residents, ongoing Open Space Gap Analysis, the 2017 Parks and Open Space Plan, the 2014 Parks Legacy Plan, the 2016 Seattle Recreation Demand Study, the 2015 Community Center Strategic Plan and other city plans.

Reflecting on all the data gathered from studies, surveys and the public engagement process, the current strongest demands and needs in Seattle are to:

- focus on adequate maintenance of existing facilities,
- provide more walking, hiking, or multi-use trails,
- provide more multi-purpose sports fields to allow for different sports and unscheduled or un-programmed use, and
- provide more parkland including beach and waterfront areas, urban gardens and farms.

In general, it is anticipated that there will be increased demand for "close-to-home" recreation due to the increased population density and traffic congestion that may affect mobility in Seattle. While it is anticipated that many Seattleites will take advantage of regional recreational attractions in the Olympic and Cascade Mountains, and other Puget Sound destinations, much of Seattle's less affluent population tend to have relatively little access to such amenities due to lack of transportation, lack of sufficient income, or demands of work. It will be important to continue to offer an array of park and recreation opportunities that are affordable and easily accessible to all members of the public.

The 2024 Parks and Open Space Plan's adopted Level of Service (LOS) aims to provide parks and park facilities within a 10-minute walk of all residents. As of 2023, approximately 95% of the City's population are within a 10-minute walk of a park or park facility. Within designated regional and urban centers, the City aims to provide parks and park facilities within a 5-minute walk of residents.

In addition to SPR facilities included in the City's CIP, the types of SPR prospective capital projects that the City may undertake or fund over the next 20 years may include new or upgraded facilities:

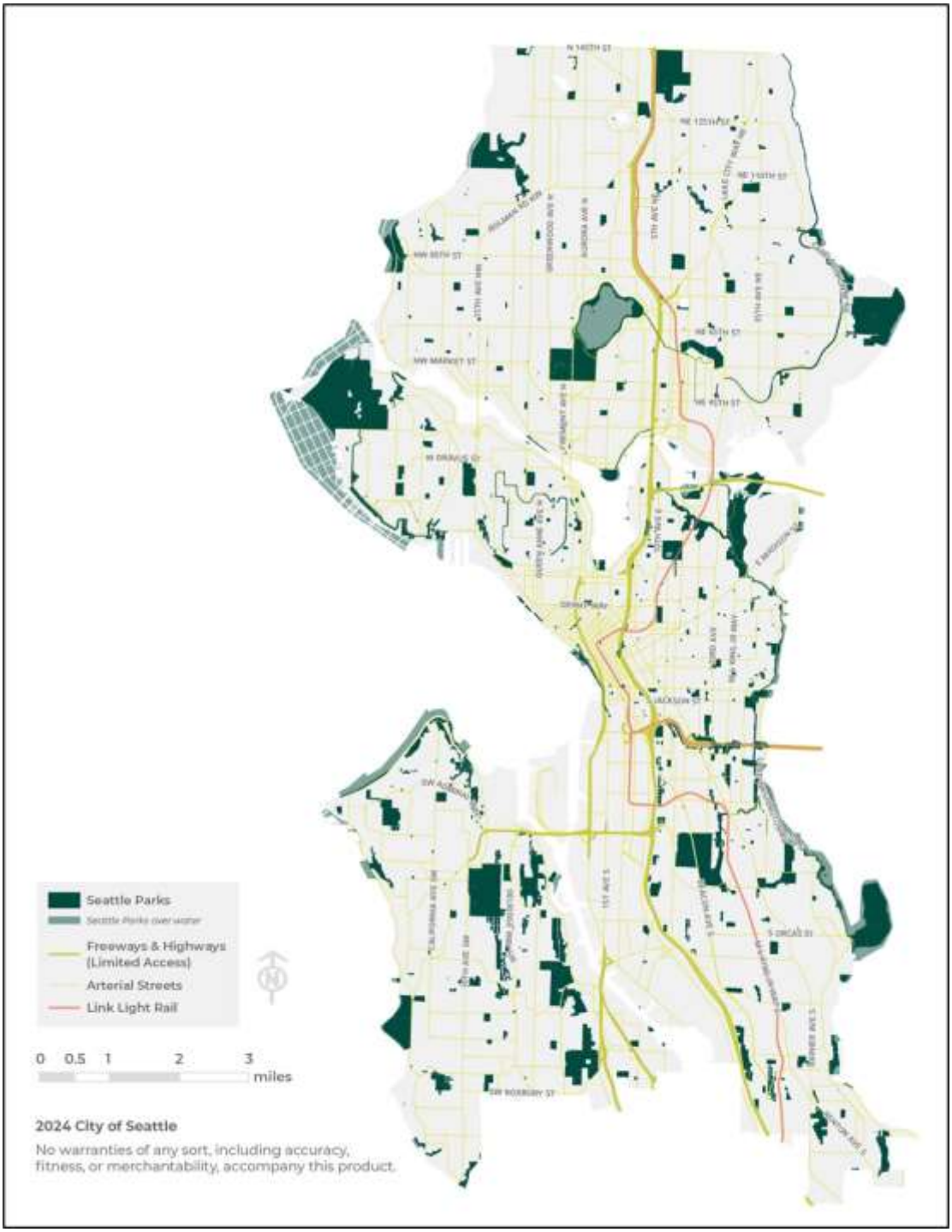
- community centers
- play areas
- outdoor fitness equipment
- sports courts
- picnic shelters
- linear street parks and green streets

The City has a robust citywide park system, which is available and accessible for use by all of the City's residents. To enhance Seattle's quality of life, the City seeks to add parks and open space to the City's system as additional amenities for all of the City's residents. Park acquisitions are opportunity-driven, thus sites to be acquired over the next 20 years have been identified. However, such additions are not necessary to accommodate new households in centers or citywide. To that end, the City continues to acquire land for public purposes in three priority areas:

- Land acquisitions for Regional and Urban Centers are prioritized based on the "gap analysis" in Seattle Parks and Recreation 2024 Parks and Open Space Plan (pages 65-72)
    - Centers located outside of Downtown Regional Center
- Land acquisitions for Natural Areas and Greenbelts are prioritized based on the following criteria:
    - Inholdings that interfere with public access and SPR management.
    - Gaps in existing SPR holdings.
    - Best natural resource value.
    - Availability of funds other than Seattle Park District funding.

    - Other considerations, such as access to non SPR-owned open space; and
    - Availability of land for purchase.
- Land acquisitions for other areas of the city may be prioritized based on the following criteria
    - Equity and health
    - Income and poverty
    - Density
    - Opportunity

Figure A-154
Map of Seattle Parks and Recreation (SPR) Parks



Source: OPCD 2024

Figure A-155
Table of Seattle Parks and Recreation (SPR) Parks by Park Type

PARK TYPE	TOTAL ACREAGE
Boulevards/Green Streets/Greenways	393
Community Parks	730
Downtown Parks	37
Greenbelts/Natural Areas	1,470
Mini Parks/Pocket Parks	47
Neighborhood Parks	602
Regional Parks	2,779
Special-Use Parks/Specialty Gardens	420

Source: SPR 2024 Park and Open Space Plan

Figure A-156
Table of Seattle Parks and Recreation (SPR) Recreation Facilities by Type

FACILITY TYPE	# OF FACILITIES
Boating — Hand Launch Sites	38
Boat Ramps	11
Fishing Piers	10
Rowing, sailing, and small craft centers	3
Indoor Swimming Pools (8), Outdoor Swimming Pools (2)	10
Swimming Beach	9
Wading Pool/Spray Feature	31
Community Centers	27
Environmental Education Centers	5
Teen Life Centers	3
Dog Off-Leash Areas	14
Golf Courses, including Driving Ranges (3), Green Lake Pitch/Putt (1)	5
Lawn Bowling	2
Indoor tennis centers (Amy Yee, Tennis Center Sand Point)	2
Basketball (59 locations)	90+
Bocce Ball	2
Pickleball (90 blended striping on tennis courts)	90
Tennis (56 locations)	150+
Volleyball – Outdoor (five locations)	5
Play Areas	156
Skateparks, comprised of district parks, skatespots, and skatedots	11

Sports Fields, fully synthetic playing surfaces (33), lighted (66)	207
Track and Field Tracks (West Seattle Stadium, Lower Woodland)	13
2 Museums (Seattle Asian Art Museum, MOHAI)	2
Seattle Aquarium	1
Woodland Park Zoo, 45 major exhibits, 145 buildings and structures (92 acres)	1
Bathhouses (repurposed for other uses, Green Lake Theatre, Madrona Dance Studio)	9
Performing and Visual Art Facilities	6
Amphitheaters	5
Public Restrooms (94), Shelter Houses (29), restrooms attached to other buildings (5)	123
Picnic Shelters (rentable)	47
Administrative offices, crew quarters and maintenance shops	20

Source: SPR 2024 Park and Open Space Plan

General Government

The Department of Finance and Administrative Services (FAS) is responsible for the facility management, maintenance, construction development and planning for 120-city-owned facilities-approximately 3.2 million square feet of building space throughout the city. FAS' capital investments either improve or enhance the operational capacity of these mission-critical facilities and systems. FAS also provide centralized real estate services to City departments. This includes buying, selling or transferring property.

Inventory

General government facilities include City Hall, Seattle Municipal Tower, vehicle repair shops, other office space, warehouses, communication facilities, social services facilities, and the Seattle Animal shelter. The City also owns property that is leased to social service organizations. The general locations of existing general government facilities are mapped in Figure A-158 and listed in Figure A-159.

Planning Goals

The City approaches long-range planning goals for general government facilities based on operational needs. FAS partners with other City departments, who as tenants, drive the plans for their department's operational and staffing needs, as well as other program needs. These governmental facilities are related to, or necessary for, future growth as dictated by the growth needs and demands put upon other departments served by FAS. The City plans for asset preservation of these facilities through a capital maintenance program. Ongoing minor and major capital facility projects are programed in the CIP.

FAS' current CIP priorities include life and safety issues, regulatory requirements, and sustainability. The CIP focuses primarily on preserving existing City assets, decarbonizing building systems, and expanding electric vehicle (EV) charging infrastructure for the City fleet. The FAS Asset Preservation Program spans across the city to preserve the real property assets within the communities served. EV and decarbonization investments are critical to achieving the City's transportation electrification strategy and emissions reduction goals.

Future Needs

FAS has identified a need for expanded facilities that support vehicle maintenance, including specialty fire vehicles, and other department operations over the next twenty-years. Additional maintenance and office space may be needed as the City grows. This need is driven primarily by budget revenue and departmental priorities. Additional space needs can be accommodated through leasing as well as building new space. General facilities that support citywide functions such as the Seattle Animal Shelter and Consumer Protection also need new and expanded facilities to address

quality of life and safety issues with current space. FAS will continue to partner with other City departments to assist with their Capital Facility needs, as well as real estate, property management, construction, development, planning, and forecasting needs required to meet City growth, and the service demands of the future. Currently no additional lands have been identified for general government purposes.

In addition to general government facilities included in the City's CIP, there are a number of prospective capital projects that the City may undertake or fund over the next 20 years:

- City building maintenance facilities upgrades
- City building ADA improvements
- City vehicle maintenance facilities replacement, such as at Haller Lake and Charles Street
- Office space consolidation and/or growth tracking needs of the City
- Seattle Animal Shelter repairs, upgrades and eventual replacement
- Consumer Protection Division facility upgrades
- Building energy efficiency improvements
- Seattle fleet electric vehicle infrastructure

Figure A-157
Map of General Government Facilities

Source: OPCD 2024

Figure A-158
Table of General Government Facilities

Facility Name	Map Reference	Year Built/ Major Renovation	Size (sq. ft.)	Description	Building Name	Address
Central Building	1 (Civic Campus)	1907/1955	37,658	Leased Office	Central Building	810 3rd Ave
City Hall		2003	199,530	Council, Mayor and other Municipal Offices	City Hall	600 4th Ave
Columbia Center		1985/1999	76,445	Leased Office	Columbia Center	701 5th Ave
SeaPark Garage		1993	213,346	Parking Garage for City Campus	SeaPark Garage	609 6th Ave
Seattle Municipal Tower		1989	1,223,577	Municipal Offices	Seattle Municipal Tower	700 5th Ave
		1989	193,891	Municipal Tower Parking	Seattle Municipal Tower Garage	
800 Fifth Avenue		1981/2000	43,837	Leased Office	Bank of America Fifth Avenue Plaza	800 5th Ave
Airport Way Center	2	1944/1981	102,075	Office Building	Airport Way Ctr- A (100-400)	2203 Airport Way S
		1985	16,800	FAS Shops & Offices	Airport Way Ctr- B (500) Shops	

Facility Name	Map Reference	Year Built/ Major Renovation	Size (sq. ft.)	Description	Building Name	Address
		1985	22,803	FAS Paint Shops	Airport Way Ctr- D (800) Paint	
Charles Street Campus	3	1994	2,576	Fuel Station	Charles Street- FAS Fleets Fuel Station	1040 7th Ave S
		1950/1975	69,225	Fleets Vehicle Maintenance	Charles Street- Bldg A- Fleets Vehicle Maintenance	805 S Charles St
		1951	14,221	SPU Materials Testing Lab	Charles Street- Bldg I- Material Test Lab/ Ofc-SPU	707 S Plummer St
		1974	21,315	SPU and SDOT Engineering	Charles Street- Bldg C- SDOT Engineering	714 S Charles St
		1967/1975	6,344	Fleets Tire Shop	Charles Street- Bldg E- Tire Shop	814 8th Ave S
		1950/1967	19,930	Traffic Meter Shop	Charles Street- Bldg H- Traffic Meter	1010 8th Ave S
		1954/1964	5,504	Weights and Measures	Charles Street- Bldg B- Weights & Measures	801 S Dearborn St

Facility Name	Map Reference	Year Built/ Major Renovation	Size (sq. ft.)	Description	Building Name	Address
Haller Lake Campus	4	1973/1995/2017	10,661	SPU Drainage & Wastewater Operations	HLF DWU Operations Bldg C- SPU	12600 Stone Ave N
		2019	2,060		HLF DWU Operations New Trailer T-1- SPU	12597 Ashworth Ave N
		2000	672		HLF DWU Operations Trailer T-2- SPU	12600 Stone Ave N
		2000	672		HLF DWU Operations Trailer T-3- SPU	
		1975/2015	3,400		HLF DWU Warehouse & Yard- SPU	
		1958	27,046	Vehicle Maintenance Building A	HLF FAS Vehicle Maint Bldg A	12555 Ashworth Ave N
		1975	2,001	Fuel Station	HLF Fuel Pump Island	12600 Stone Ave N
		1973	2,668	SDOT Paint Shop	HLF SDOT Paintshop Bldg D/ Bridge Maintenance	1328 N 125th St
		2018	474	SPU Hazardous Waste Buildings	HLF HHW Aurora HHW Shed- SPU	12530 Stone Ave N

Facility Name	Map Reference	Year Built/ Major Renovation	Size (sq. ft.)	Description	Building Name	Address
		1998	2,214		HLF HHW Collection Canopy- SPU	12550 Stone Ave N
		1993	668		HLF HHW Offices- SPU	
		1996	6,780	SDOT Street Maintenance Building B	HLF SDOT Street Maint Garage Bldg B	12599 Ashworth Ave N
SDOT Sign Shop	5	1962/1970	45,036	SDOT Sign Shop Warehouse	SDOT Sign Shop Warehouse	4200 Airport Way S
SDOT West Seattle Shops	6	1956	5,122	SDOT Street Maintenance	SDOT West Engineering Shops & Offices	9200 8th Ave SW
		1956	10,342		SDOT West Engineering Shops & Storage	9100 8th Ave SW
Animal Shelter	7	1981	10,567	Animal Shelter and Spay & Neuter Clinic	Animal Shelter	2061 15th Ave W
FAS Warehouse	8	1980/1989	31,844	Records and Surplus	FAS Warehouse	3807 2nd Ave S
Northwest Senior Center	9	1950/1967	8,400	Senior Center	Northwest Senior Center	5431 32nd Ave NW
South Park Neighborhood Center	10	1919/1980	5,848	South Park Neighborhood Center	South Park Neighborhood Center	8201 10th Ave S

Facility Name	Map Reference	Year Built/ Major Renovation	Size (sq. ft.)	Description	Building Name	Address
Ballard Customer Service Center	C1	2005	3,100	Customer Service Center	Ballard Customer Service Center	5604 22nd Ave NW
Central Area Customer Service Center	C2	1982/1990	3,941	Customer Service Center	Central Customer Service Center	464 12th Ave Fl 1
Lake City Customer Service Center	C3	1965/2000/2005	400	Customer Service Center	Lake City Customer Service Center	12525 28th Ave NE
Lake City Civic Core Garage		2005	8,549	Garage for Customer Service Center and Library	Lake City Civic Core Garage	12501 28th Ave NE
Southeast Customer Service Center	C4	2003	1,500	Customer Service Center	Southeast Customer Service Center	3815 S Othello St
Southwest Customer Service Center	C5	1975	1,000	Customer Service Center	Southwest Customer Service Center	2801 SW Thistle St
University Customer Service Center	C6	1927/1990	1,400	Customer Service Center	University Customer Service Center	4534 University Way NE
Benaroya Hall	n/a	1998/2001	284,100	Ground Lease to BH Music	Benaroya Hall	200 University St

Facility Name	Map Reference	Year Built/ Major Renovation	Size (sq. ft.)	Description	Building Name	Address
Freeway Park Parking Garage-WSCTC	n/a	1975	63,750	Leased to Washington State Convention Center	Freeway Park Parking Garage	1227 9th Ave
Northeast Telecom	n/a	2016	600	Communications Building	Northeast Telecom	8526 Roosevelt Way NE
2021 22nd Ave S	n/a	1970 / 1980	15,500	Leased Warehouse & Comm Shop	2021 22nd Ave S	2021 22nd Ave S

Source: FAS 2024

Seattle Public Library

Since 1891, the Seattle Public Library (SPL) has grown from a single reading room in Pioneer Square to a world-class Library system with 27 locations and a robust "virtual library" available 24/7 through SPL website and mobile services. Library facilities not only house SPL's collection of books and materials, but also provide welcoming and functional spaces for all members of the community. In 2022 Seattle library users collectively checked out 11.1 million items. Library buildings are among the most intensively-used City facilities in Seattle. Prior to the pandemic, the Central Library hosted over 1.2 million visitors annually, with library branches serving over 3.6 million visitors.

SPL receives funding from a mix of public and private sources. Every year, the City Council approves an annual budget appropriation that covers most basic expenses. In 2019, Seattle voters approved a seven-year, $219.1 million Library levy to improve access to critical educational and literacy resources and increase economic opportunity for every city resident. Two organizations, The Seattle Public Library Foundation and The Friends of the Seattle Public Library, raise money to help fund activities, services and special projects not covered by SPL's operating budget.

Inventory

SPL facilities include 26 branch libraries, the Central Library, and Maintenance and Operations Center. Library buildings can be divided into major categories:

- Ten buildings are designated as historic landmarks, including seven Carnegie-era libraries (built in the early 1900s) and three modern buildings.
- Eleven branch libraries are either new construction built primarily in the early 2000s (eight buildings) or non-landmarked buildings developed between the 1950s and the 1970s (three buildings).
- Five small library branches are essentially storefronts, four of which are part of larger buildings.
- Three branches are located in rented space.
- The Central Library serves as headquarters and hub of the library system. It houses the bulk of the Library's extensive collection of books and materials (including rare "special collections" in the Level 10 Seattle Room), a 375-seat auditorium, public meeting rooms, a gallery, large public areas for reading and access to 330 public computers, a data center housing system-wide servers, and Library administration.
- The Maintenance and Operations Center, which houses the Library's materials distribution system, serves as SPL's maintenance shop and storage facility and hosts a fleet of five book mobiles.

Existing SPL facilities are mapped in Figure A-160 and listed in Figure A-161.

Planning Goals

SPL's CIP projects generally fall into one or more of the following categories: asset preservation, operational efficiency, environmental stability, public service improvements, and safety and security. SPL conducts condition assessments and updates to identify deficiencies and opportunities to reduce operating costs. Other proposals to change the use of some library space are evaluated. Public input also plays a role in projects planning.

The overriding priority of SPL's CIP is asset preservation, extending the useful life of its buildings. Examples of asset preservation projects include major repairs and replacement to roofs, building envelopes, HVAC and other critical building systems, doors, windows, flooring and casework, finishes and restroom fixtures.

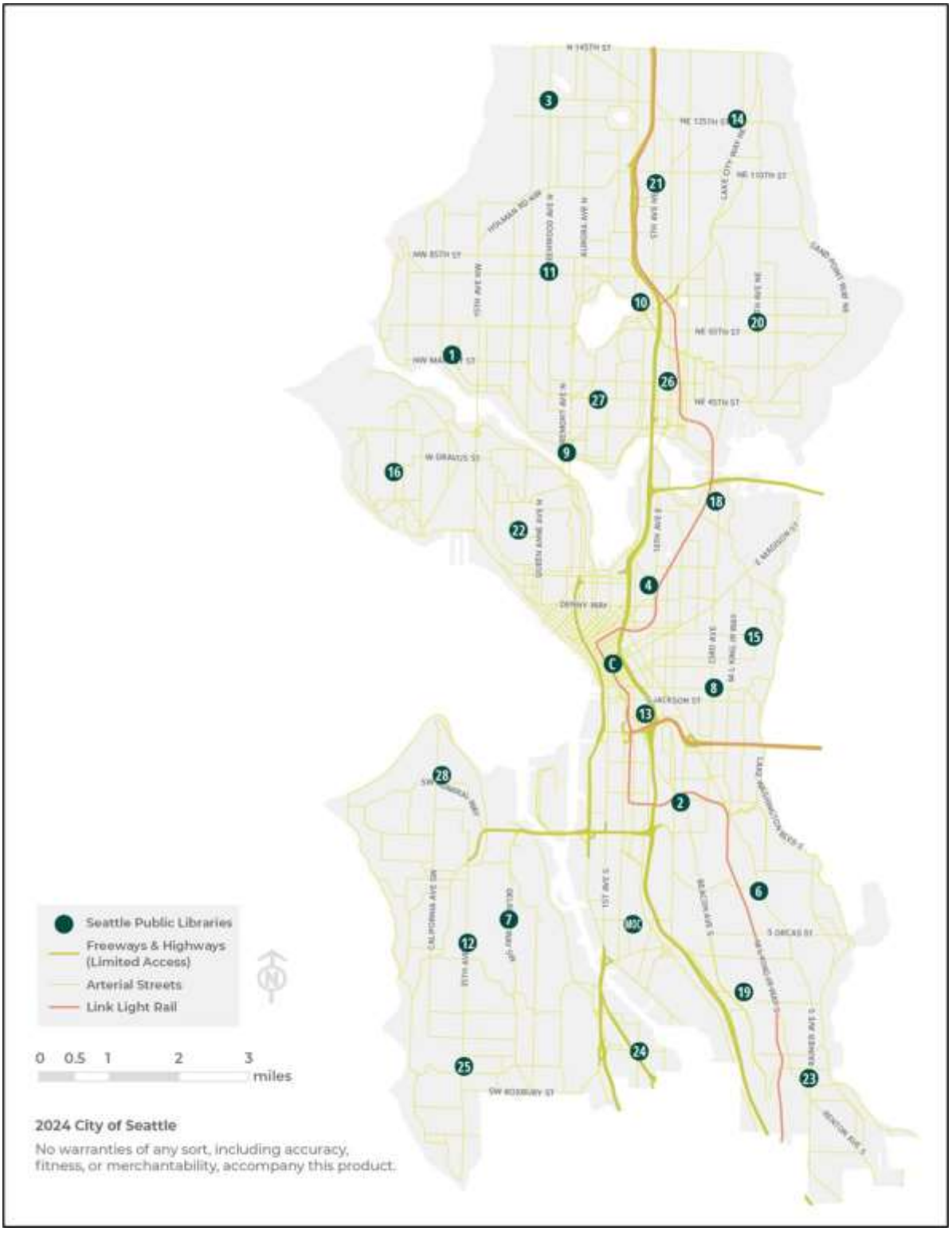
Of the Library's 26 neighborhood branches, seven are Carnegie-era branches that are considered historic city and state landmarks. These branches—Douglass-Truth, Columbia, Fremont, Green Lake, Queen Anne, University, and West Seattle—are unreinforced masonry buildings, which means the buildings are at an increased risk for damage during a seismic event. The 2019 Levy included funding for seismic retrofits at the three of the most vulnerable branches: Green Lake, University and Columbia. Seismic retrofit projects will also allow installation of air conditioning in these Carnegie-era branches. Seismic retrofits and other building improvements are complete for the Green Lake Branch, and are about to begin for the Columbia Branch. SPL has not yet determined an anticipated construction start date for the Columbia Branch.

Air-conditioned public spaces have become an increasingly important community need throughout the city as summer temperatures climb, wildfire smoke becomes more prevalent, and many lack air conditioning in their homes. With the recent installation of air conditioning at two branches, unscheduled closures due to excessive heat in the summer have been reduced.

Mechanical systems replacement, repair and electrification of branch libraries will continue, with emphasis on the highest priority sites, to fulfill the Mayor's Executive Order for City-owned buildings to be fossil free by 2030.

Figure A-159

Map of Seattle Public Library Facilities



Source: OPCD 2024

Figure A-160
Table of Seattle Public Library Facilities

SPL Facilities	Map Reference	Year Built/ Major Renovation	Address	Size (sq. ft.)
Central	C	2004	1000 4th Ave	363,000
Branch Libraries				
Ballard	1	2005	5711 24th Ave NW	15,000
Beacon Hill	2	2004/2017	2519 15th Ave S	10,400
Broadview	3	2007	12755 Greenwood Ave N	15,000
Capitol Hill	4	2003	425 Harvard Ave E	11,615
Columbia*‡	6	1915/2004/2024	4721 Rainier Ave S	12,420
Delridge	7	2002	5423 Delridge Way SW	5,600
Douglass-Truth*‡	8	1914/2006	2300 E Yesler	8,008
Fremont*‡	9	1921/2005	731 N 35th St	6,840
Green Lake*‡	10	1910/2024	7364 E Green Lake Dr N	8,090
Greenwood	11	2005/2017	8016 Greenwood Ave N	15,000
High Point	12	2004/2017	6302 35th Ave SW	7,200
International District / Chinatown	13	2005	713 Eighth Ave S	3,930
Lake City*	14	1965/2005/2019	12501 28th Ave NE	15,300
Madrona-Sally Goldmark**	15	1973/2008	1134 33rd Ave	1,707
Magnolia*	16	1964/2008	2801 34th Ave W	7,790
Montlake	18	2006	2300 24th Ave E	1,574
New Holly	19	1999	7058 32nd Ave S	4,000

SPL Facilities	Map Reference	Year Built/ Major Renovation	Address	Size (sq. ft.)
Northeast*	20	1954/2004/2013	6801 35th Ave NE	15,000
Northgate	21	2006	10548 5th Ave NE	10,000
Queen Anne*‡	22	1914/2007/2018	400 W Garfield St	7,931
Rainier Beach	23	1981/1986/2004	9125 Rainier Ave S	15,000
South Park	24	2006/2019	8604 Eight Ave S	5,019
Southwest	25	1961/1986/2007	9010 35th Ave SW	7,557
University*‡	26	1910/2007/2024	5009 Roosevelt Way NE	8,104
Wallingford	27	2000/2009	1501 N 45th St	2,000
West Seattle*‡	28	1910/1987/2004	2306 42nd Ave SW	9,460
Other Facilities				
Maintenance and Operations Center	MOC	2021	5516 4th Ave S	n/a

*City of Seattle Landmark or located in City landmark/special review district

**City historic resource survey properties

‡Carnegie-era branch

Source: OPCD 2024

Future Needs

SPL is developing a strategic plan to guide the next 10 years and the development of the next levy that will go to the voters in 2026. Future building needs are one area of focus.

The strategic planning process has begun to identify future building needs. SPL is already working to reduce its carbon footprint and convert building systems away from fossil fuels. But SPL lacks a dedicated funding stream for this work, as well as for the ongoing maintenance needs of its high-use public facilities. Voter-approved Levy funds, state and federal grants and other one-time funding sources can provide support for building needs and upgrades, but a longer-term, sustainable approach is needed to maintain these beloved, but aging buildings.

In particular, the iconic Central Library will enter its third decade of service during 2024, and its systems are aging. A building of the Central Library's size, complexity, and intensity of use requires significant annual maintenance to preserve core functionality and continually improve building efficiency. Updating the Central Library's mechanical and HVAC systems to reduce its carbon footprint will require significant funding beyond the annual Levy major maintenance allocation.

SPL's buildings are increasingly being called on to serve in multiple capacities: centers of learning and knowledge, community meeting and gathering spaces, heating and cooling centers during extreme weather, daytime respite during wildfire smoke events, a safe haven for people experiencing housing instability, and more.

To serve these many needs, buildings must be flexible and accessible in design, as well as safe, clean, well-maintained and welcoming to all. SPL must leverage new technologies to meet building and sustainability goals, as well as to grow or improve collections, programs and services. Currently, no additional lands have been identified for SPL purposes.

Key goals for addressing future building needs in coming years include:

- Create accessible and culturally responsive Library spaces
- Reduce the Library's carbon footprint by meeting or exceeding the City's carbon reduction goals
- Offer access to modern technologies with an emphasis on reducing the digital divide
- Utilize new technologies to assess and improve the effectiveness of Library systems
- Be innovative in approach to capital improvements, facilities management, accessibility and beautification of library buildings

Potential actions to achieving these goals:

- Evaluate community usage of current Library locations; determine whether changes are needed
- Evaluate the current accessibility of Seattle libraries and develop an improvement plan
- Develop and implement a plan to move all Seattle libraries away from fossil fuels

- Enhance transportation options at libraries, such as bicycle parking and electric vehicle charging
- Convert the Library's fleet to electric vehicles
- Establish a solar roof replacement program whenever library roofs exceed their useful lives
- Develop adaptable and programmable spaces
- Provide fast and reliable Library technology, including hardware, software and internet access
- Maintain and upgrade systems to support scalable, sustainable technologies and services, including the Integrated Library System
- Monitor the success of Library sustainability work with goals, assessment and reporting

Seattle Center

Seattle Center is an active civic, arts and family gathering place adjacent to our downtown. More than 30 cultural, educational, sports and entertainment organizations reside on the grounds of the 74-acre campus providing a broad range of public and community programs and hosting thousands of events. Seattle Center is the most visited arts and cultural destination in the state, attracting an estimated 10 million visitors each year who attend arts, sporting, educational, and cultural events and festivals, and enjoy the grounds and open spaces. While these events and activities draw significant revenue for the city, Seattle Center will continue maintaining campus grounds and their unique features for the casual visitor. Seattle Center will also continue to serve its critical role in providing emergency shelter during adverse weather events and implementing the annual Seattle/King County Clinic public health event, which saw nearly 3,000 patients receive free medical and dental care for its tenth iteration in 2024.

Seattle Center resides on Indigenous lands, the traditional territories of the Coast Salish people. The origins of a civic campus at Seattle Center go back to the 1920s, with Mayor Bertha Landes presiding over the groundbreaking for the Civic Auditorium, Civic Ice Arena, and Civic Field. In the 1930s the Washington State Armory was built. Memorial Stadium was constructed in the 1940s. In the late 1950s and early 1960s the site for the 1962 Seattle World's Fair was created which is now Seattle Center, a City department.

Inventory

There are 24 buildings and three parking garages on the campus. The Seattle Center Monorail runs between the Seattle Center campus and Westlake in downtown Seattle. The City owns the Monorail, which is operated by Seattle Monorail Services. The Space Needle, the Pacific Science Center, and Seattle Public Schools' Memorial Stadium and its adjacent parking lot are also part of the campus but are owned and operated by private and other public entities.

The center includes 24 buildings and three parking garages (See Figure A-162 and Figure A-163).The center is home to twelve theater spaces ranging in capacity from 200 seats in the Cornish Playhouse to 2,900 at Marion Oliver McCaw Hall and totaling nearly 6,000 seats for theatrical performances. Sports facilities include the Climate Pledge Arena with a capacity of 17,000+ and Memorial Stadium with a capacity of 12,000 for field events.

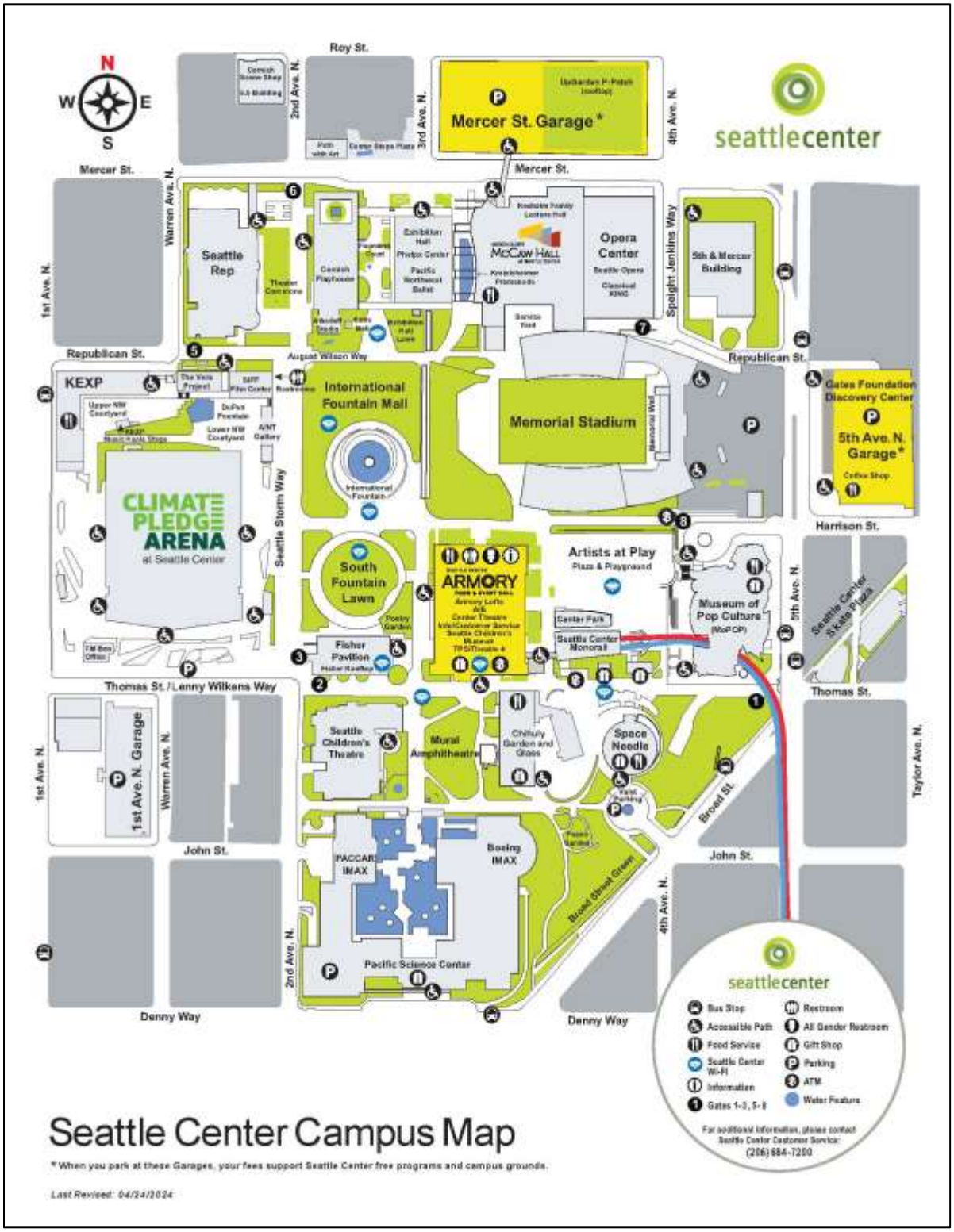
The center owns and manages two surface parking lots and three parking garages totaling more than 3,500 spaces. The center is served by multiple King County Metro bus routes and by the Monorail, which runs between Downtown and Seattle Center and carries more than 2 million riders a year over a 0.9-mile route.

Seattle Center is also a major urban park with lawns, gardens, fountains, a children's play area (Artists at Play Plaza & Playground), skate park, and a variety of plazas and open spaces. The center includes approximately 40 acres of landscaped and green open space and pedestrian ways. Seattle Center's outdoor open spaces are a major urban oasis for active or passive and individual or group enjoyment.

As of June 2023, the Seattle Center expanded its services to the new Waterfront Park. Seattle Center will be stepping into a partnership with Friends of Waterfront Park to manage operations, maintenance, and public safety in the Waterfront Promenade, Overlook Walk, Pier 58, and Pier 62 at Waterfront Park.

Existing Seattle Center facilities are mapped in Figure A-162 and listed in Figure A-163.

Figure A-161
Map of Seattle Center Facilities



Source: Seattle Center 2024

Figure A-162
Table of Seattle Center Facilities

FACILITY	ADDRESS	SIZE IN SQUARE FEET
Building (formerly Pottery NW	226 First Ave N	7,200
5th & Mercer Building	401 Mercer St	88,910
A/NT Gallery (formerly the International Fountain Pavilion)	2nd Ave N & Republican St	4,681
Armory Food & Event Hall	305 Harrison St	278,500
Artists at Play	158 Thomas St	130,680
Center Steps Plaza	Mercer St	4,457
Central Plant	324 Republican St	10,072
Chihuly Garden and Glass	305 Harrison St	30,000
Climate Pledge Arena	334 1st Ave N	740,000
Cornish Playhouse (w/out courtyard)	201 Mercer St	33,424
Cornish Playhouse Rehearsal Hall	201 Mercer St	4,333
Cornish Scene Shop	Roy St	
Exhibition Hall	225 Mercer	52,000
Fifth Ave N Garage	516 Harrison St	356,390
First Ave N Garage	220 1st Ave N	173,000
Fisher Pavilion	200 Thomas St	21,018
International Fountain	n/a	122,000
International Fountain Pavilion	2nd Ave N & Republican	4,681
KEXP (formerly the NW Rooms)	472 1st Ave N	35,240
Kobe Bellhouse	n/a	600

FACILITY	ADDRESS	SIZE IN SQUARE FEET
Maintenance Shop – Leased (5.5 Building)	621 2nd Ave N	30,720
Marion Oliver McCaw Hall	321 Mercer St	295,000
Memorial Stadium	401 5th Ave N	238,920
Memorial Stadium Parking Lot	401 5th Ave N	101,489
Mercer Arena	363 Mercer St	108,000
Mercer Street Garage	300 Mercer St	511,424
Monorail Office and Gift Shop	370 Thomas St	4,592
Monorail Terminal	370 Thomas St	19,563
Mural Amphitheatre	305 Harrison St	3,200
Museum of Pop Culture	200 2nd Ave N	283,324
Opera Center/ Classical KING	363 Mercer St	105,000
Pacific Science Center	200 2nd Ave N	141,681
Park Place	232 1st Ave N	7,200
Path with Art	200 Mercer St	4,800
Phelps Center/Pacific NW Ballet	225 Mercer St	49,680
Restroom Pavilion	303 2nd Ave N	1,219
Seattle Center Skate Plaza	305 Harrison St	18,000
Seattle Center Warehouse (under N. Stadium Stands)	369 Republican St.	20,774
Seattle Children's Theatre	240 Thomas St	46,300
Seattle Children's Theatre Tech Pavilion	201 Thomas St	29,112
Seattle Repertory Theatre	151 Mercer St	65,000

FACILITY	ADDRESS	SIZE IN SQUARE FEET
SIFF (Seattle International Film Festival)	167 Republican St	11,776
Space Needle	400 Broad St	4,400
The VERA Project	305 Harrison St	9,536

Planning Goals

As Seattle Center embraces the post-pandemic return of crowded summer festivals and plays an important role supporting the recovery of downtown, now is the time to address these infrastructure needs and ensure it is well-positioned to serve the city's needs in the coming years through repairs, renewal, and redevelopment of the facilities and grounds of Seattle Center to provide a safe and welcoming place for millions of annual visitors.

Overall planning goals for capital improvements include:

- Preserving campus buildings and infrastructure
- Assessing building systems and developing maintenance and repair schedules
- Maintaining and repairing campus-wide utilities
- Creating and maintaining multi-use public spaces for both free and fee supported events
- Maintaining a large collection of public art
- Upgrading landscape features and public gathering spaces
- Planning for campus improvements and modernization Seattle Center
- Retrofitting buildings for improved energy efficiency
- Removing barriers in buildings, pathways, and public spaces on campus to better serve campus visitors of all abilities

Future Needs

The biggest challenge facing Seattle Center is the campus' rapidly aging infrastructure and funding constraints on advancing replacement projects to address it. The only new facilities funded in the current CIP include Waterfront Operations and Tribal Interpretive Center. The CIP also includes studies to support major redevelopment projects for Memorial Stadium and Lot 2. Most CIP projects focus on improving, rehabilitating, restoring, repairing, various existing buildings (including Fisher Pavilion, Mc Caw Hall, Armory, Theaters, Monorail Station), public art, open spaces, parking lots, site signage other infrastructure, energy efficiency, ADA improvements, and general site improvements.

Seattle Center has recently completed a series of Facility Condition Assessments (FCAs). These studies will define our priority investment in asset maintenance and replacement for the major existing systems on campus, including:

- Roofing assessment of all major facilities
- Cladding and fenestration assessment of selected facilities
- Mechanical systems
- Electrical systems
- Plumbing and piping
- Water features (including the iconic Seattle Center International Fountain)
- Elevators
- Campus bollards

Between 2025-2030 Seattle Center will invest $50.6 million for major asset preservation, including plans to spend nearly $29.5 million to design and construct the replacements and repairs identified in the FCAs as most critically needed for facility safety and reliability. Because our Real Estate Excise Tax (REET) allocation is not sufficient to keep pace with all needed replacements and repairs across the campus, the most urgent projects will be prioritized. Seattle Center intends to invest the remaining $21.1 million of REET in projects to upgrade public spaces across the campus to meet public needs and support our core lines of business. Currently, no additional lands have been identified for Seattle Center purposes.

In 2024, Seattle Center and the Seattle Center Foundation kicked off an exciting process to create a 10-year Vision and Action Plan. The plan, to be completed in 2025, will incorporate research and stakeholder engagement, incorporate best practices from cultural campuses from around the world, and will result in an action plan for Seattle Center's future and will guide capital project planning and funding strategies in the coming years.

One major project underway is the redevelopment of the 77-year-old Memorial Stadium. It is owned by Seattle Public Schools (SPS) on land deeded by the City and is outdated, deteriorated, and in need of redevelopment. The new facility will transform the heart of Seattle Center with a state-of-the-art stadium that will serve SPS' needs for athletic events and graduations and be a major civic venue for arts, cultural, sports, and community events. In June 2023 following a Request For Proposals, the Mayor and School Superintendent agreed to enter into negotiations with One Roof Stadium Partnership (One Roof) to jointly develop an enhanced stadium. In 2024, Seattle Center, SPS and One Roof reached an important milestone by aligning on key project terms. Funding for the redevelopment will include SPS levy money, State capital budget, City of Seattle CIP funds, and private fundraising led by the One Roof Partnership. The Seattle Center warehouse will be relocated from Memorial Stadium to allow the existing stadium to be demolished. The new stadium is expected to be completed by the end of 2027.

As Seattle looks forward to welcoming the global community to the FIFA World Cup in June 2026, Seattle Center will play a critical role in hosting the FIFA Fan Fest event, where nine viewing parties

are anticipated each with crowds as large as our largest typical summer events. Capital improvements are needed to make the event a safe and welcoming experience through following repairs and improvements: security bollards, electrical infrastructure upgrades, International Fountain repairs and upgrades, furnishings for campus open spaces, and lawn restorations.

In addition to the Seattle Center projects included in the CIP, there are a number of prospective Seattle Center capital facility studies and projects that the City may undertake or fund over the next 20 years:

- 401 Mercer (Formerly KCTS) redevelopment for a future revenue generating use
- Planning to mitigate any potential impacts of future light rail
- Campus-Wide Open Space Plan
- Thomas Street Partnership to envision a new use and reinvestment in an aging gift shop building

Seattle Public Schools

Inventory

Public schools in Seattle are owned and operated by the Seattle Public Schools (SPS). As of October 2023, 49,226 students are enrolled in SPS and attend one of the 104 SPS schools (18 high schools, 12 middle schools, 11 K-8 schools, 63 elementary schools). SPS also owns various athletic, administrative, and support buildings.

Existing school locations are mapped in Figure A-164 and listed in Figure A-165.

Planning

Capital facility planning is driven by a number of factors, including projected student population, curriculum goals, educational specifications (including classroom size and necessary facilities), and specialized needs of specific students.

The SPS's latest plan is the SPS 2021 Facilities Master Plan Update. It provides planning information for a six-year period, 2021-2026. The Facilities Master Plan includes information on the condition of building systems (heating and ventilation system, roofing, windows, etc.) and educational adequacy (how design and layout supports student success). The report also includes cost estimates to replace or repair each system.

SPS develops enrollment projections, the expected number of students for a specific time period, based on historical information and demographics, especially birth rates. Like many school districts SPD is adapting to shifting community demographics. As of March 2024, SPS is forecasting that total enrollment will decline over the next ten years to somewhere between a low of 41,000 and a high of 46,000 students.

SPS conducts a district-wide capacity analysis annually. Multiple variables impact capacity including: the quantity, sizes and types of classrooms; the collective bargaining agreements, staffing ratios, school specific academic programs; student support programs; school master schedules; and community partnerships (preschool programs, community learning centers, etc.).

SPS is operating several school buildings that are under-enrolled, which often occurs in schools that serve the youngest students. SPS has proposed to develop a system of well-resourced schools. This new model would mean SPS would have fewer school buildings that serve students in preschool through 5th grade, but the building capacity would be better aligned with student enrollment.

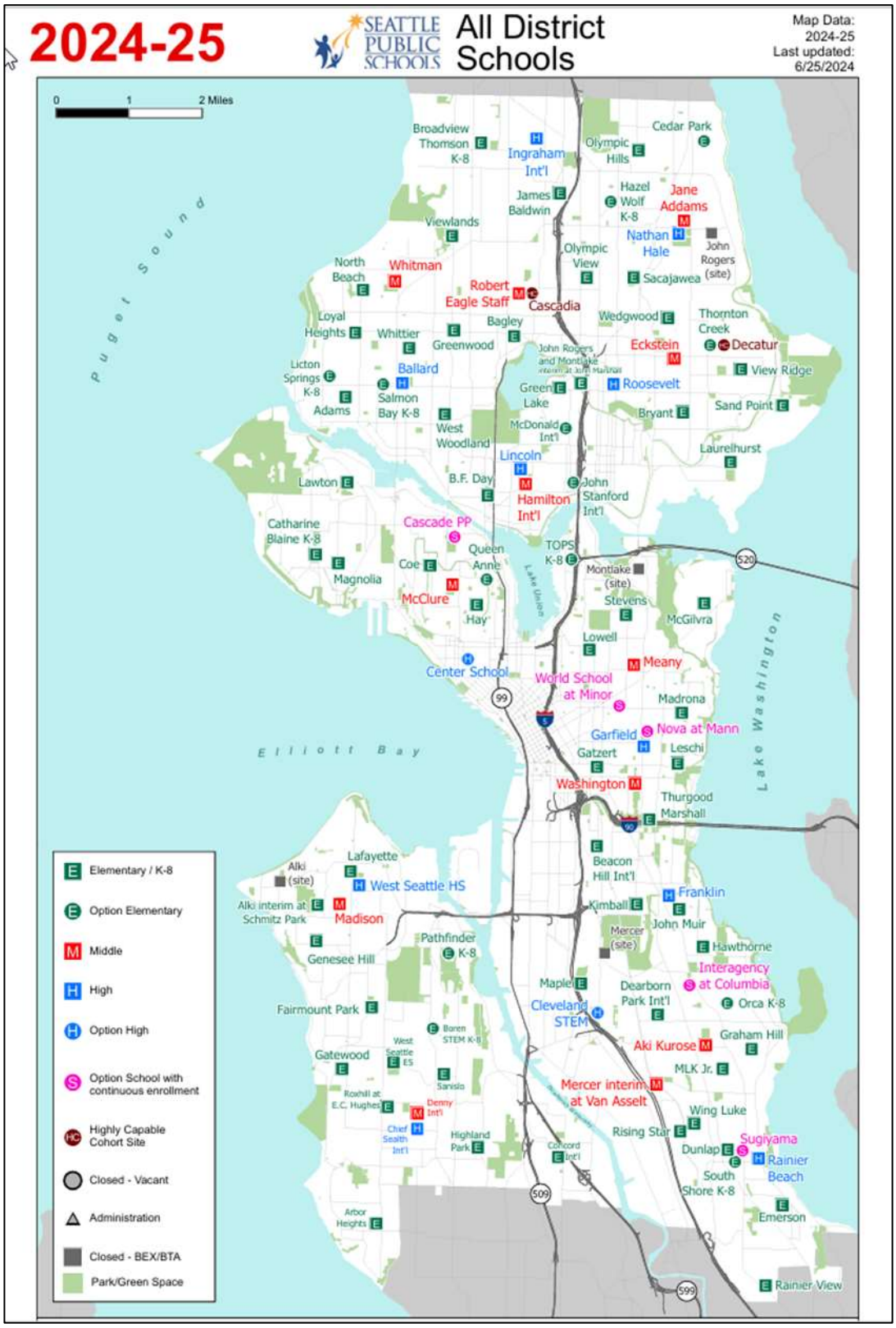
Future Needs

For the majority of funding for facility construction and renovation, SPS relies on two voter-approved capital levies. These run on alternating six-year schedules and are called Building Excellence (BEX) and Buildings, Technology and Academics (BTA). BEX funds the renovation and replacement of schools, and BTA provides capital monies to repair existing building envelopes, replace roofs,

improve mechanical/electrical/life-safety systems, and provide technology improvements. The next levy, BEX VI, is expected to be on the ballot in February 2025. Currently, no additional lands have been identified for SPS purposes.

Figure A-163

Seattle School District Schools



Source: Seattle Public Schools

Figure A-164
Seattle School District Schools

SCHOOL/FACILITY	USE	ADDRESS	LANDMARK	BUILDING AREA (GSF)	SITE AREA (ACRE)	DATE OF CONSTRUCTION	DATE OF LAST FULL RENOVATION/ ADDITION
Adams	E	6110 28th Ave. NW		63,136	3.4	1989	
Alki	E	3010 59th Ave. SW		45,387	1.4	1954	*2025*
Arbor Heights	E	3701 SW 104th St.		91,660	5.7	2016	
B.F. Day	E	3921 Linden Ave. N	✓	66,937	3.9	1892	1991
Daniel Bagley	E	7821 Stone Ave. N	✓	62,752	3.9	1930	2020
Beacon Hill International*	E	2025 14th Ave. S		51,704	1.9	1971	
Bryant	E	3311 NE 60th St.	✓	83,167	3.3	1926	2001
Cascadia	E	1700 North 90th St.		97,381	5.4	2017	
Cedar Park	E	3737 NE 135th St.	✓	33,037	4.4	1959	2015
Frantz Coe	E	2424 7th Ave. W		79,461	2.9	2003	2021
Concord International	E	723 S Concord St.	✓	67,889	3.4	1913	2000
Dearborn Park International*	E	2820 S Orcas St.		54,573	9.5	1971	2006
Decatur	E	7711 43rd Ave. NE		44,210	2.6	1961	1966

SCHOOL/FACILITY	USE	ADDRESS	LANDMARK	BUILDING AREA (GSF)	SITE AREA (ACRE)	DATE OF CONSTRUCTION	DATE OF LAST FULL RENOVATION/ ADDITION
Dunlap	E	4525 S Cloverdale St.	✓	74,310	4.9	1924	2000
Emerson	E	9709 60th Ave. S	✓	78,804	1.8	1909	2001
Fairmount Park	E	3800 SW Findlay St.		63,658	3.1	1964	2014
Gatewood	E	4320 SW Myrtle St.	✓	55,785	3.6	1910	1991
Bailey Gatzert	E	1301 E Yesler Way		53,958	6.8	1988	
Genesee Hill	E	5013 SW Dakota St.		91,281	6.8	2016	
Graham Hill	E	5149 S Graham St.		55,792	4.5	1961	2004
Green Lake*	E	2400 N 65th St.		49,397	3.4	1970	2015
Greenwood	E	144 NW 80th St.	P	65,600	2.8	1909	2002
Hawthorne	E	4100 39th Ave. S		52,793	2.6	1989	
John Hay	E	201 Garfield St.		51,362	3.2	1989	
Highland Park	E	1012 SW Trenton St.		76,206	3.7	1999	
John Stanford International/Latona	E	4057 5th Ave. NE	✓	67,495	2.2	1906	2000
Kimball*	E	3200 23rd Ave. S		42,614	4.8	1971	1998; 2023

SCHOOL/FACILITY	USE	ADDRESS	LANDMARK	BUILDING AREA (GSF)	SITE AREA (ACRE)	DATE OF CONSTRUCTION	DATE OF LAST FULL RENOVATION/ ADDITION
Lafayette	E	2645 California Ave. SW		53,471	4.7	1950	1953
Laurelhurst	E	4530 46th Ave. NE	P	54,125	2.7	1928	1950
Lawton	E	4000 27th Ave. W.		54,766	5	1990	
Leschi	E	135 32nd Ave.		59,490	3	1988	2022
Lowell	E	1058 E Mercer St.	P	74,136	3.9	1919	1962
Loyal Heights	E	7735 25th Ave. NW	✓	94,407	2.9	1932	2018
Martin Luther King Jr.	E	6725 45th Ave. S		73,566	3.4	2004	
Magnolia	E	2418 28th Ave. W.	✓	77,718	2.5	1927	2019; 2021
Madrona	E	1121 33rd Ave.		68,127	1.8	2002	2002
Maple*	E	4925 Corson Ave. S		49,730	6.7	1971	2006
McDonald International	E	6725 45th Ave. S	P	54,551	2.2	1914	1923
McGilvra	E	144 NE 54th St.	✓	45,492	2.5	1913	2018
Montlake	E	1617 38th Ave. E.	✓	23,983	1.7	1924	*2025*

SCHOOL/FACILITY	USE	ADDRESS	LANDMARK	BUILDING AREA (GSF)	SITE AREA (ACRE)	DATE OF CONSTRUCTION	DATE OF LAST FULL RENOVATION/ ADDITION
John Muir	E	3301 S Horton St.		60,031	3.3	1991	
North Beach (to be closed in 2025)	E	9018 24th Ave. NW		41,791	6.9	1958	
Northgate	E	11725 1st Ave. NE		46,982	5.8	1956	*2025*
Olympic Hills	E	13018 20th Ave. NE		96,081	6.5	2017	
Olympic View	E	504 NE 95th St.		52,792	4.3	1989	
Queen Anne	E	2100 4th Ave. N	✓	67,382	3	1903	2019
Rainier View	E	11650 Beacon Ave. S		38,141	8.9	1961	
Rising Star/African American Academy	E	8311 Beacon Ave. S		106,370	10.9	2000	
John Rogers	E	4030 NE 109th St.		38,582	9	1956	*2025*
Roxhill/E. C. Hughes	E	7740 34th Ave. SW	✓	48,010	3.7	1926	2018
Sacajawea (to be closed in 2025)	E	9501 20th Ave. NE		41,261	3.8	1959	
Sand Point	E	6208 60th Ave. NE		33,899	4.3	1957	
Sanislo* (to be closed in 2025)	E	1812 SW Myrtle St.		42,110	8.5	1970	1998
Stevens (to be closed in 2025)	E	1242 18th Ave. E	✓	69,381	2.4	1906	2001

SCHOOL/FACILITY	USE	ADDRESS	LANDMARK	BUILDING AREA (GSF)	SITE AREA (ACRE)	DATE OF CONSTRUCTION	DATE OF LAST FULL RENOVATION/ ADDITION
Thornton Creek	E	7712 40th Ave. NE		92,490	7.3	2016	
Thurgood Marshall	E	2401 S Irving St.		61,054	4.5	1991	
View Ridge	E	7047 50th Ave. NE		68,719	9.1	1948	1969
Viewlands	E	10525 3rd Ave. NW		34,675	6.5	1954	1986; *2023*
Wedgwood	E	2720 NE 85th St.		47,851	4.5	1955	
West Seattle ES	E	6760 34th Ave. SW		52,359	6.9	1988	*2022*
West Woodland	E	5601 4th Ave. NW		79,292	3.5	1991	2021
Wing Luke	E	3701 S Kenyon St.		86,730	6.9	2021	2021
Whittier	E	1320 NW 75th St.		71,864	2.7	1999	
Blaine	K-8	2550 34th Ave. W		109,109	8	1952	
Louisa Boren (STEM)	K-8	5950 Delridge Way SW		119,514	15	1963	
Broadview-Thomson	K-8	13052 Greenwood Ave. N		129,984	9.3	1963	
Pathfinder/Cooper	K-8	1901 SW Genesee St.		74,497	13.9	1999	

SCHOOL/FACILITY	USE	ADDRESS	LANDMARK	BUILDING AREA (GSF)	SITE AREA (ACRE)	DATE OF CONSTRUCTION	DATE OF LAST FULL RENOVATION/ ADDITION
Hazel Wolf	K-8	11530 12th Ave. NE		81,897	3.2	2016	
Monroe/Salmon Bay	K-8	1810 NW 65th St.	P	117,116	4.2	1931	
TOPS/Seward	K-8	2500 Franklin Ave. E	✓	95,501	1.8	1893	1999
Orca/Whitworth	K-8	5215 46th Ave. S		63,649	3.4	1989	
South Shore	K-8	4800 S. Henderson St.		138,859	11.4	2009	
Licton Springs/Webster	K-8	3015 NW 68th St.	✓	52,580	1.55	1908	1930; 2020
Aki Kurose	M	3928 S Graham St.		171,393	4.8	1952	
David T. Denny International	M	2601 SW Kenyon St.		138,778	17.4	2011	
Eckstein	M	3003 NE 75th St.	✓	177,977	13.9	1950	1968
Hamilton International	M	1610 N 41st St.	✓	150,473	2	1926	2010
Jane Addams	M	11051 34th Ave. NE	P	160,645	18	1949	1950; 2016
Madison	M	3429 45th Ave. SW	✓	155,667	8.9	1929	2005; *2022*
McClure	M	1915 1st Ave. W		94,263	2.3	1964	1968

SCHOOL/FACILITY	USE	ADDRESS	LANDMARK	BUILDING AREA (GSF)	SITE AREA (ACRE)	DATE OF CONSTRUCTION	DATE OF LAST FULL RENOVATION/ ADDITION
Meany	M	301 21st Ave. E		125,517	4.1	1955	2016
Mercer International	M	1600 S Columbian Way		129,993	8.4	1957	*2025*
Robert Eagle Staff	M	1330 N 90th St.		139,400	11.5	2017	
Washington	M	2101 S Jackson St.		143,793	17.3	1963	
Whitman	M	9201 15th Ave. NW		145,832	14.6	1959	
Ballard	H	1418 NW 65th St.		242,795	12.3	1999	
Chief Sealth International	H	2600 SW Thistle St.		230,357	21.6	1957	2010
Center School	H	305 Harrison St		17,500			
Cleveland	H	5511 15th Ave. S	✓	161,731	8.5	1927	2007
Franklin	H	3013 S Mt. Baker Blvd.	✓	269,201	8.7	1912	1990
Garfield	H	400 23rd Ave.	✓	244,177	9	1923	2008
Ingraham	H	1819 N 135th St.	✓	236,069	28.2	1959	2019
Lincoln	H	4400 Interlake Ave. N	✓	256,025	6.7	1907	1960; 2019
Nathan Hale	H	10750 30th Ave. NE		242,146	18.4	1963	2010

SCHOOL/FACILITY	USE	ADDRESS	LANDMARK	BUILDING AREA (GSF)	SITE AREA (ACRE)	DATE OF CONSTRUCTION	DATE OF LAST FULL RENOVATION/ ADDITION
Rainier Beach	H	8815 Seward Park Ave S		189,638	21.5	1961	1998; *2025*
Roosevelt	H	1410 NE 66th St.	✓	269,297	9.2	1922	2006
Alan T. Sugiyama at South Lake	H	8601 Rainier Ave. S		29,519	3.2	2008	
West Seattle High School	H	3000 California Ave. SW	✓	208,981	8	1917	2002
CPPP/North Queen Anne	S	2919 1st Ave. W		22,975	2.3	1914	1922; 2022
Interagency/Columbia	S	3528 S. Ferdinand St.	P	34,581	3.2	1922	
Nova Alternative/Horace Mann	S	2410 E Cherry St.	✓	49,267	1.76	1902	2014
Interagency/Queen Anne Gym	S	1431 2nd Ave. N		35,805	0.95	1961	
SW Interagency/Roxhill Site	S	9430 30th Ave. SW		48,502	2.7	1958	
Seattle World School @ T.T. Minor	S	1700 E Union St.		59,495	3.49	1941	2016
John Marshall (Interim site)	I	520 NE Ravenna Blvd.	P	87,927	3.2	1927	
Schmitz Park (Interim site)	I	5000 SW Spokane St.		37,009	7.5	1962	

SCHOOL/FACILITY	USE	ADDRESS	LANDMARK	BUILDING AREA (GSF)	SITE AREA (ACRE)	DATE OF CONSTRUCTION	DATE OF LAST FULL RENOVATION/ ADDITION
Van Asselt (Interim site)	I	7201 Beacon Ave. S		59,610	8.4	1950	*2023*
Original Van Asselt (Original Bldg.)	I	7201 Beacon Ave. S	✓	14,240	8.4	1909	*2023*
Athletic Office	A	401 5th Ave. N		1,803	2.7	1965	
John Stanford Center	A	2445 3rd Ave. S		350,000	12.1	2002	
Memorial Stadium	F	401 5th Ave. N	P	163,290	6.3	1947	
Fremont Art Council (former BF Day ES)		3940 Fremont Ave. N	✓	1,696	3.9	1910	2017
Columbia Annex (Closed/Leased)		3100 S Alaska St.		7,648	1	1944	
Former Fauntleroy School		9131 California Ave. SW		-	1.4		
Interlake – Wallingford Center (land lease)		4416 Wallingford Ave. N	✓	52,078	1.7		
Lake City ProfessionalBuilding		2611 NE 125th St.	✓	37,500	2.7		
Leschi Donated House		3020 East Yesler Way		2,660	0.14	1952	
Denny Site (Vacant)		8402 30th Ave. SW		-	4.16		

SCHOOL/FACILITY	USE	ADDRESS	LANDMARK	BUILDING AREA (GSF)	SITE AREA (ACRE)	DATE OF CONSTRUCTION	DATE OF LAST FULL RENOVATION/ ADDITION
Cleveland Memorial Forest		28322 SE Issaquah - Fall City Rd., Fall City, WA			32.9		
Jefferson Square Mall (land lease)		4720 42nd Ave. SW		282,642	3.2		
Oak Lake (tenant Oak Tree Plaza)		10040 Aurora Ave. N		-	3.4		
West Queen Anne School Condo (land lease)		1401 5th Ave. W	✓		1.7		

Appendix 4 Utilities

Introduction

The Utilities Appendix includes GMA required information about the location and capacity of all existing and proposed utilities - electrical, natural gas, telecommunications, drinking water, drainage and wastewater, and solid waste systems.

The City plans for City-owned utilities to preserve and maintain existing infrastructure, and build new facilities to support expected population and job growth. In addition to providing essential services to residents and businesses, utility investments contribute to overall local economic vitality, quality of life, safety, climate mitigation, and help the City meet all the state and federal requirements associated with these services.

In some cases the required inventories, level of service, and future needs for utilities are detailed in specific system plans and analyses. References to these plans are included where needed. Seattle's Capital Improvement Program (CIP), which is updated as part of the City's annual budget process, contained detailed information about City-owned utility projects to be untaken over the next six years.

Electricity

Seattle City Light (SCL) is the City-owned electric utility serving all of Seattle and some portions of other cities and unincorporated King County north and south of the city limits (see Figure A-166). SCL provides electrical power to over 425,000 residential customers and 50,000 commercial customers.

Every two years SCL develops or updates an Integrated Resource Plan (IRP). The IRP describes how SCL will meet anticipated customer energy needs over the next 20 years while meeting reliability, cost, risk, environmental and equity goals. The IRP includes long-term load forecasts and identifies energy resource options. The IRP is developed with flexibility and is regularly reviewed to respond to changing market conditions and future uncertainties. SCL developed a full IRP in 2022 and an update in 2024.

Figure A-165
Seattle City Light Service Area

Inventory & Capacity

SOURCES OF ELECTRICITY

SCL supplies power from a portfolio of sources that includes SCL-owned generation resources and purchased power. SCL typically purchases about half of all power delivered to its customers. Figure A-167 lists the sources of power and their contribution to SCL's power portfolio for 2023. Figure A-168 shows the general location of these sources.

The current resource portfolio includes SCL-owned generation resources, long term contract resources, near term purchases, and sales made in the wholesale power market, and conservation.

SCL-owned Generation Resources:

- The Boundary Dam, located on the Pend Oreille River in northeastern Washington, is City Light's largest resource. The dam has a peaking capability slightly above 1,000 megawatts (MW) and an average annual generation of approximately 418 average megawatts (aMW)[161]. Under an agreement between City Light and the Pend Oreille County Public Utility District No. 1 (PUD), City Light provides a portion of the output of the Boundary Dam to Pend Oreille PUD through the end of the current license.
- The Skagit Project includes the Ross, Diablo, and Gorge Dams in the North Cascades. This triple-cascaded project is located on the Skagit River in Whatcom, Skagit, and Snohomish Counties. These dams have a combined one-hour peak capability of about 700 MW at full pool with generous storage capacity, but they have significant operational constraints for fish management. Their average annual generation is approximately 274 aMW.
- South Fork Tolt Reservoir and Dam is located 16 miles upstream from the City of Carnation on the South Fork Tolt River in King County. This project is jointly operated with Seattle Public Utilities to provide drinking water to the metropolitan Seattle area. The project has a one-hour peaking capability of less than 17 MW and average annual generation is approximately 6 aMW.
- Cedar Falls Dam is located in King County. This was City Light's first hydroelectric plant and the nation's first municipally owned hydroelectric plant. This project is jointly operated with Seattle Public Utilities to provide drinking water to the metropolitan Seattle area. The project has a capacity of 30 MW and average annual generation is approximately 8 aMW.

SCL Long Term Contract Resources:

- The Bonneville Power Administration (BPA) contract allows City Light to receive power from 31 hydroelectric projects and several thermal and renewable projects in the Pacific Northwest. The energy is delivered over BPA's transmission grid.

[161] One megawatt is 1 million watts. One million watts delivered continuously 24 hours a day for a year (8,760 hours) is called an average megawatt.

- The High Ross Agreement is an 80-year treaty with the Canadian Province of British Columbia (BC). City Light ended plans to raise the height of Ross Dam in exchange for power purchases from British Columbia Hydro (acting through its subsidiary Powerex).
- The Seven Mile Encroachment contract associated with the High Ross Treaty allowed BC Hydro to raise the Seven Mile Reservoir, which reduced the output at Boundary Dam due to encroachment on the tailrace. Under this agreement, BC Hydro returns or pays for the energy that would otherwise have been generated at Boundary Dam if Seven Mile Reservoir had not been raised.
- The Lucky Peak Project is a hydropower project located near Boise, Idaho, where City Light has power purchase contract rights to Lucky Peak output (approximately 34 aMW annually) until 2038.[162]
- The Priest Rapids Project consists of two dams; Priest Rapids Dam and Wanapum Dam. City Light purchases power from this project under two agreements with Grant PUD, which owns and operates the project.
- The Columbia Basin Hydropower contracts comprise power from three hydroelectric projects. The projects are owned by three irrigation districts, so electric generation is mainly in the summer months. Two contracts that were previously part of this group have expired (Eltopia Branch Canal and RD Smith).
- The Columbia Ridge Landfill Gas Project is a 20-year power purchase agreement with Waste Management Renewable Energy, LLC to purchase approximately 12 aMW each year from its landfill.
- The King County West Point Treatment Plan Project is a 20-year power purchase agreement that began in February 2010 with King County to purchase the output from a methane gas-producing digester at the wastewater treatment plant in Discovery Park.

[162] City Light occasionally enters into energy exchange agreements to exchange the weather-driven output of the project for firm energy. For the period studied in the 2024 IRP Progress Report it was assumed that output of the Lucky Peak Project is used to serve load directly without exchanges.

Figure A-166
Sources of Electrical Generation

SOURCE	DATE IN SERVICE	GENERAL LOCATION	TYPE	ENERGY PRODUCED (MWH)
SCL Owned Generation				
Boundary	8/23/1967	Pend Oreille River	Hydro	2,851,570
Skagit Projects (includes Gorge, Diablo and Ross Dams)	9/27/1924	Skagit River, North Cascades	Hydro	1,691,073
South Fork Tolt Reservoir and Dam	11/20/1995	S. Fork Tolt River	Hydro	30,432
Cedar Falls	10/14/1904	Cedar River	Hydro	25,809
Total Owned				4,598,884
Contracts	Contract Expires			
Bonneville Power Administration Block	2028	Multiple locations in Pacific NW	Hydro	4,039,150
High Ross Agreement	2066	British Columbia	Hydro	303,454
Seven Mile Encroachment	2066	British Columbia	Hydro	9,258
Lucky Peak	2038	Boise, Idaho	Hydro	332,046
Priest Rapids Project	2052		Hydro	19,221
Columbia Basin Hydropower	2025-2027	Columbia River	Hydro	249,373

Columbia Ridge	2028/ 2033	Arlington, OR	Landfill gas	78,333
King County West Point Wastewater Treatment Plant	2033	Seattle	Biogas	7,215
Condon Wind	2028	Condon OR	Wind	33,991
Total Contracts				5,072,041
Grand Total				9,670,925

In April 2024, City Light recently executed two solar power purchase agreements for 47 MW and 40 MW. These projects are expected to start operations March 2025 and December 2025 respectively.

Source: Seattle City Light Integrated Resource Plan, 2024

Figure A-167
Electrical Generation Resources

Source: City Light, Integrated Resource Plan 2024

Distribution

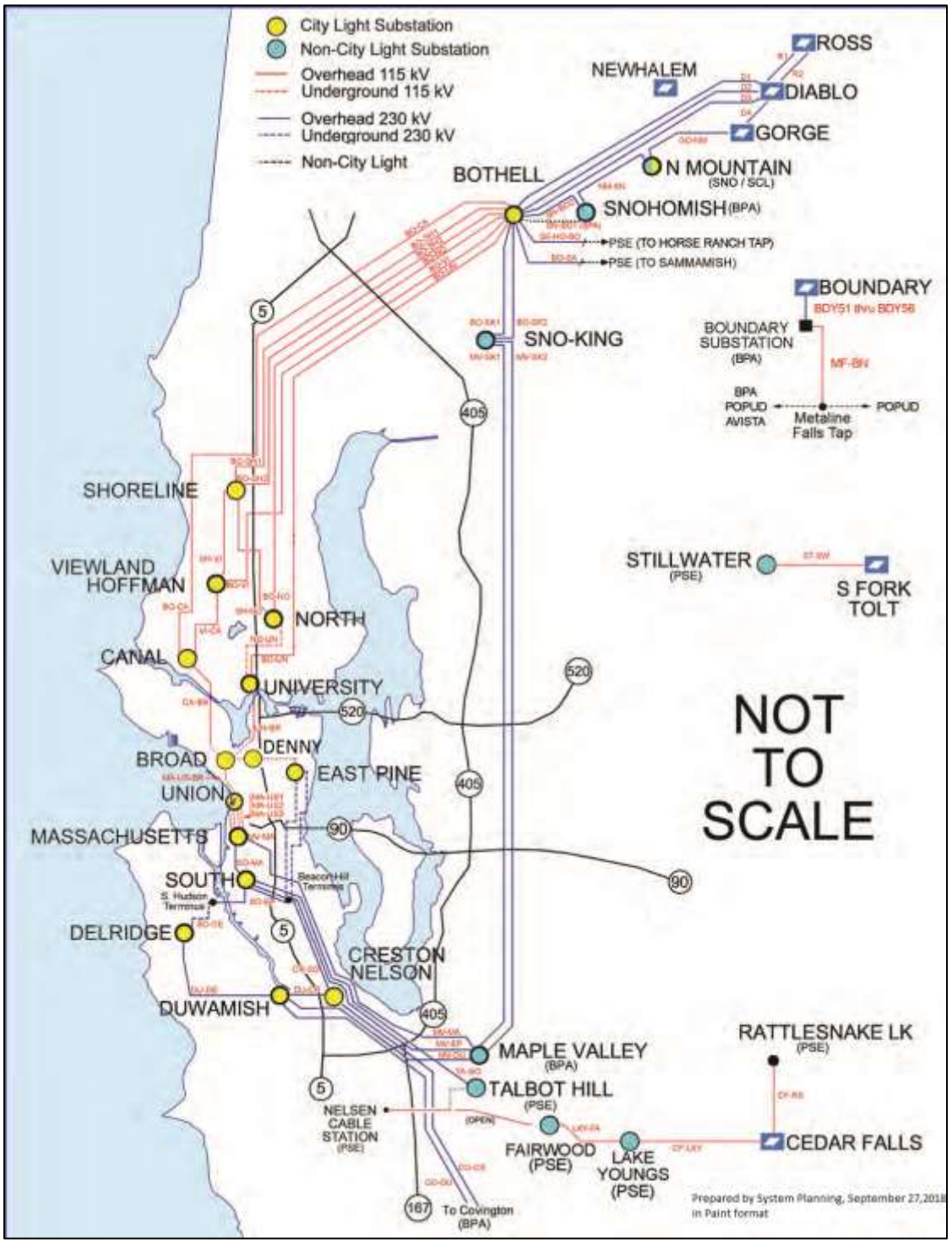
SCL owns and maintains approximately 667 miles of high voltage transmission lines, which carry power from the Skagit and Cedar Falls generating facilities to 16 principal substations. SCL is dependent on other transmission line owners, i.e., the Bonneville Power Administration (BPA), to bring power from its Boundary Dam hydroelectric plant and from other contracted resources, to serve its load in Seattle. The transmission grid interconnection with other utilities also provides additional reliability to meet load requirements. Power is distributed from SCL's principal substations via high voltage feeder lines to numerous smaller distribution substations and pole transformers, which reduce voltage to required levels for customers. SCL owns and maintains 2,500 miles of overhead and underground distribution lines within Seattle that deliver power from the 16 principal substations to approximately 365,200 customers. Figure A-169 shows the general location of transmission lines and substations. SCL also has a state-of-the-art System Operations Center located in Seattle.

SCL's current generation capability (owned and contracted) is adequate to serve existing customers. Because of the nature of City Light's hydroelectric system, the utility is not presently constrained by its ability to meet peak loads (typically referred to as capacity). At times, the system may be constrained in its ability to carry load over periods of heavy load hours (6 a.m. to 10 p.m.) during the

winter. On an average monthly basis, City Light currently has sufficient resources to meet expected customer load in the next few years, even under serious drought conditions.

SCL sells on the wholesale energy markets the energy it does not need to meet customer load. The utility also buys energy in the wholesale markets to enhance the value of its resource portfolio and to meet occasional short-term energy deficits.

Figure A-168
Electrical Transmission and Substation System



Source: City Light, 2018

Future Needs

Seattle City Light develops comprehensive plans to assess future energy resource additions to serve customers' electricity needs in the short and long term. Resource plans are developed in coordination with an advisory group representing diverse customer interests, approved by City Council, and filed with the Washington Department of Commerce. The publication of resource plans takes two forms (1) a Demand Side Management Potential Assessment that is used to set targets for customer programs like energy efficiency and demand response and (2) an Integrated Resource Plan (IRP) that evaluates loads and resources over a 20-year study horizon.

The 2022 IRP, 2024 Demand Side Management Potential Assessment, and the 2024 IRP Progress Report have identified the need to add resources to meet increases in electricity demand from SCL's customers as a result of electrification of the building and transportation sectors. For the studies, energy resource needs are determined based on an internally developed hourly simulation optimization model and resources identified to serve the needs are determined based on internally developed capacity expansion model that minimizes total portfolio costs while ensuring that energy resource needs are met. The addition of wind, solar, batteries, demand-side resources, and carbon free firm resources are necessary to allow SCL to meet future need.

For the transmission and distribution components of SCL's system, projected growth will be accommodated by planned transmission and distribution capacity additions. The Denny Substation, energized in May 2018, is a long-term asset for City Light's entire system, providing reliability and flexibility through the ability to back up adjacent substations. It was designed to last 50-100 years with the capacity to accommodate future needs in the South Lake Union neighborhood and beyond. SCL is planning to construct a new substation in the Interbay area to serve the South Lake Union district. SCL is evaluating the need for a new substation that will meet the load growth at the University of Washington as their district energy system transitions to electricity.

SCL acquires property, rights of way, and easements necessary for power distribution, utility improvement projects, and environmental conservation. Over the next 20 years capacity will likely be expanded at existing substations: the North, Duwamish, Shoreline and Creston. New substations in other areas also may be needed, as load growth projections are updated. SCL currently owns properties in Northeast and Northwest Seattle where new substations could be built.

SCL's electric infrastructure is being pushed to do more than ever. SCL has produced a Grid Modernization Plan and Roadmap to support increased electrification and improve grid reliability, resiliency and security. It describes projects and tasks for the next two years, as well as laying the foundation of five-year and ten-year goals, with projects spanning across planning, operations, supporting technologies, and physical infrastructure upgrades. SCL is modernizing its grid to make it more efficient, reliable, resilient, and secure. Grid modernization will reduce disruptions and outages from severe weather, climate change, and natural disasters. It will implement new technologies and processes to deliver resilient, reliable, flexible, secure, sustainable, and

affordable electricity. It will also accommodate new electrical loads from electric vehicles and ferries, transitions from natural gas to electricity for heating and cooking, and new, decentralized renewable resources such as rooftop solar.

The rapid transition to an electrified transportation system is expected to increase the demand for electricity. SCL is planning to ensure there will be sufficient power and grid capacity to support this transition. SCL, in association with SDOT and OSE, is leading the buildout of the essential network of public and private charging stations to accommodate the increasing number of electric cars, trucks, buses, ferries and other transportation modes. This increased demand is factored into SCL's IRP which is updated every two years.

District Energy

District energy systems are characterized by one or more central plants producing hot water, steam, and/or chilled water which then flows through a network of insulated pipes to provide hot water, space heating, and/or air conditioning for nearby buildings. District energy systems typically serve end-users such as central business districts, colleges and university campuses, hospitals, and healthcare facilities. Seattle currently has three district energy systems – CenTrio Energy, University of Washington Seattle Campus, and Amazon. The decarbonization of two systems, CenTrio Energy and University of Washington, will increase the demand for SCL electricity. However, Amazon's waste heat system decreases the demand for SCL electricity.

CenTrio Energy

CenTrio Energy is a district energy utility franchised by the City. CenTrio Energy produces heat at a centralized plant using boilers powered by natural gas, and distributes steam to approximately 200 commercial, residential, and institutional customers for space and water heating, along with other uses. Two steam-generating plants are connected to a low pressure and high-pressure piping network. The primary plant is located on Western Avenue at University Street. The secondary plant is located on Western Avenue near Yesler Way, the site of the original plant built in 1893. Total steam generation capacity is 670,000 pounds per hour. Its boilers are designed to burn natural gas or diesel oil. Steam is distributed through a network of insulated steel pipe encompassing a total length of over eighteen miles beneath city streets. CenTrio Energy's service area encompasses roughly a square-mile area of the Central Business District, extending from Blanchard Street to King Street and from the waterfront to 14th Avenue, crossing over First Hill.

CenTrio Energy has communicated to the City of its intent to convert its natural gas-powered boilers to non-emitting energy sources to reduce carbon emissions and comply with Washington's Climate Commitment Act. CenTrio Energy emits approximately 70,000 metric tons of carbon dioxide equivalent (MTCO2e) per year. CenTrio Energy and Seattle City Light have been meeting regularly in 2023 and 2024 to consider strategies for supplying additional power as more of CenTrio Energy's generation is switched from gas/diesel boilers to lower emission sources. CenTrio Energy is considering a number of technologies including electric boilers, more efficient industrial heat pumps, hydrogen boilers, and future technologies needing development.

University of Washington

The University of Washington (UW) Seattle district energy system includes two plants and seven miles of distribution tunnels:

- Central Power Plant, located at 3920 Jefferson Rd NE, burns natural gas supplied by Puget Sound Energy in five boilers to create steam to heat and provide hot water to approximately 180 campus buildings. The plant also includes seven chillers to create chilled water to cool roughly 65 campus buildings. Six chillers use electricity supplied by

Seattle City Light to create chilled water. One chiller is powered by steam. The Central Plant can provide 100 megawatts (MW) of 185 Psi steam (thermal energy), 10 MW of emergency power and 10,500 tons of chilling. Some of the buildings on campus require 10 psi steam. Typically, this is produced by sending the 185 psi through a pressure reducing valve (PRV). In lieu of a PRV, the UW power plant uses a backpressure steam turbine which generates electricity from what would have been wasted steam. The 3 MW capacity of the turbine generator represents less than 5% of UW's current electrical demand and reduces the amount of electricity purchased from Seattle City Light.

- West Campus Utility Plant (WCUP), located at 3900 University Wy NE, was completed in 2017. It serves as an extension of the Central Power Plant, providing additional cooling and emergency power to the University's expanding collection of research buildings in the southwest corner of campus. As built, WCUP can provide 8 megawatts (MW) of emergency power and 4,500 tons of chilling. Chiller #4 is under development and will be in place by May 2025, increasing the total to 6,000 tons. With future expansion, the plant can achieve an ultimate capacity of 12 MW total and 10,500 tons of chilling. The combination of both chilled water plants serves approximately 50% of building space on campus.

UW is working to fully decarbonize the energy system of the Seattle campus. This monumental undertaking will modernize and decarbonize UW's energy infrastructure. About 93% of the greenhouse gas (GHGs) emissions on the Seattle campus are generated by the Central Power Plant. Eliminating these emissions will help the UW meet city and state GHG reduction mandates. Additional electrical capacity is needed to add cooling to campus buildings, and meet new winter demand when the UW shifts from natural gas, a fossil fuel, to electricity for heating. The SCL service to UW already exceeds 'firm capacity' in the summer. UW has asked SCL to increase the firm capacity from 45 MW to 120 MW (electrical). UW/SCL have been working collectively to develop the optimal approach to meet the needs of the University. The University of Washington has a 5-part strategy to transition the district energy system to 100% clean energy and decarbonize the heating system that includes a range of technology investments and upgrades.

In addition to decarbonization of the Central Power Plan, other factors will increase the demand for clean energy at UW over the next 20 years: more people on campus, EV fleets, AI, and climate change (need for more cooling). SCL is planning in coordination with the UW to meet these future needs.

Amazon

Amazon's district energy system captures the equivalent of 11 megawatts per day of waste heat from the 34-story Westin Building Exchange, a nearby data center that houses 250 telecommunication and internet companies, to heat Amazon's offices in the Denny Triangle campus. Heated water is piped from the Westin to a central plant in Amazon's Regrade building where five heat-reclaiming chillers concentrate the heat which is distributed to about 5 million square feet of office space within the four-block campus.

Drinking Water

Seattle Public Utilities (SPU) provides drinking water to approximately 1.5 million people living in Seattle and surrounding communities in western King County and portions of southern Snohomish County (see Figure A-170). In addition, SPU sells wholesale water to nineteen municipalities and special-purpose districts, plus Cascade Water Alliance, who in turn provide the water to their own retail customers. SPU operates under an annual operating permit issued by the Washington State Department of Health.

Inventory & Capacity

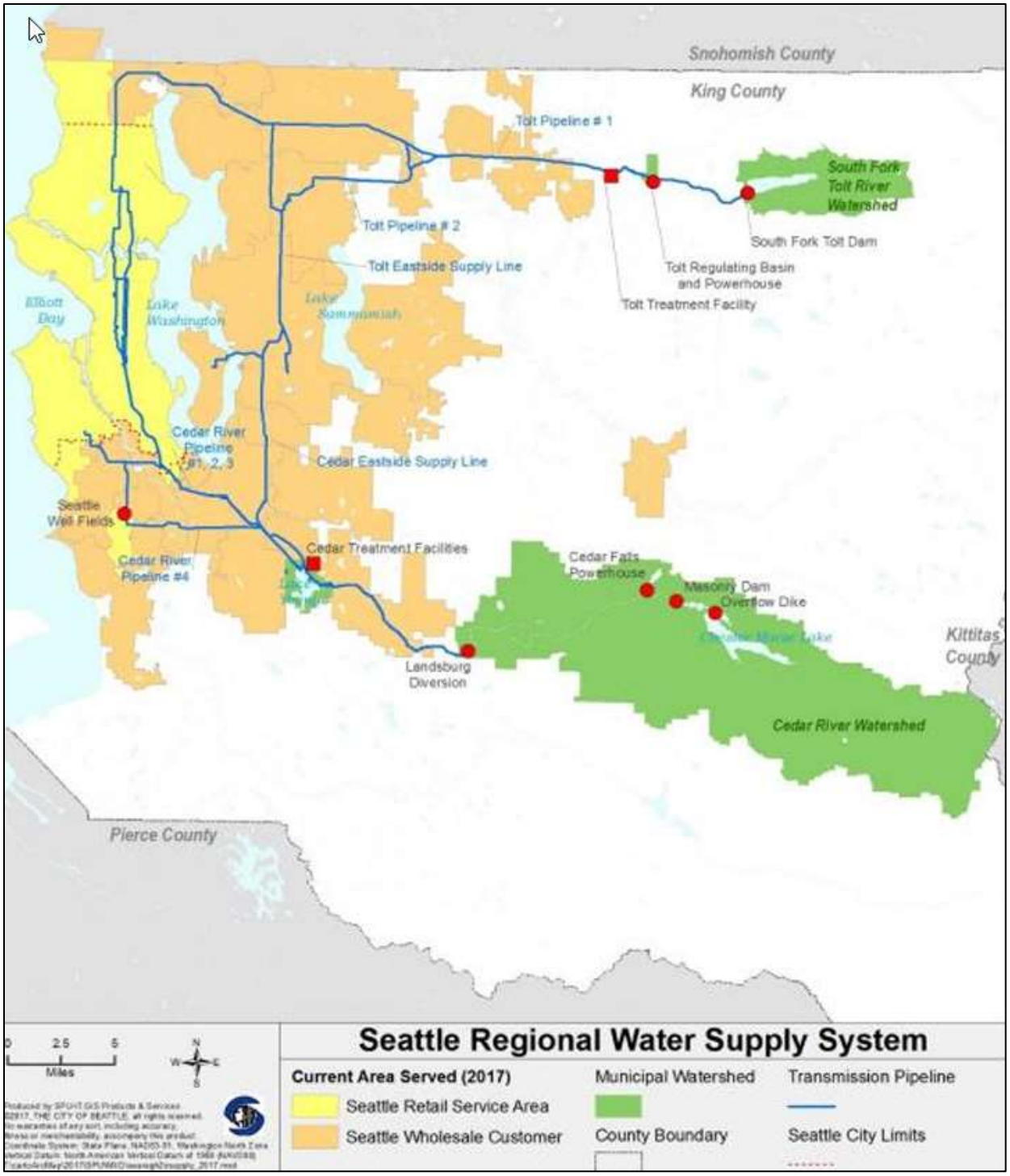
The City of Seattle's water supply comes primarily from surface water reservoirs on the Cedar River, 60 to 70 percent of the supply, and South Fork of the Tolt River, which supplies the remainder. SPU also manages a small wellfield located north of the Seattle Tacoma Airport that is available to provide drought and emergency supply. In total, these sources can supply up to 172 million gallons of water per day (mgd), on an average annual basis. Water from these sources is treated to meet drinking water quality regulations. The treated water is then delivered to Seattle retail and wholesale customers through a network of approximately 1,820 miles of transmission and distribution lines, 400 million gallons of treated water storage facilities (reservoirs, tanks, and standpipes), and thirty-one pump stations. System-wide treatment and transmission capacity is 310 million gallons per day (see Utilities Appendix Figure A-170). Actual consumption has been much less than supply and declining over time, with per capita consumption 44% less in 2019 than in 1990. In recent years, total consumption has averaged about 121 mgd.

Future Needs

SPU acquires property, rights of way, and easements necessary for water supply services and environmental conservation. Currently, no additional lands have been identified for water supply purposes and SPU does not have any planned efforts to increase water supply prior to 2060. Despite an anticipated household growth rate of 18% in its retail service area and 29% in its full and partial wholesale customers between 2016 and 2040, SPU anticipates total demand will remain relatively flat due to water conservation efforts and changes to its wholesale water customers. Current capital investments for SPU include those for maintenance of existing infrastructure including dams, watermain rehabilitation in the distribution system, seismic improvements, and ensuring the water system's resiliency under climate change.

More information about the current and future capital investments for the drinking water system can be found in Seattle's 2019 Water System Plan.

Figure A-169
Drinking Water Service Area, Facilities and Transmission Pipelines



Source: Seattle Public Utilities, 2019

Drainage & Wastewater

Seattle Public Utilities manage wastewater and drainage systems in Seattle, which include the combined sewer system, the sanitary sewer system, and the stormwater drainage system. The city contains three different types of areas: the combined sewer area (with only combined sewer systems), separated sewer areas (with sanitary sewer and stormwater drainage systems), and partially separated sewer areas (with sanitary sewer and stormwater drainage systems, where some rainwater still goes to the sanitary sewer), each covering about one-third of the city. (See Figure A-171). The King County Wastewater Treatment Division operates the West Point treatment plant—one of the County's three regional wastewater treatment plants—in addition to four combined sewer overflow (CSO) treatment facilities within the City of Seattle and the wastewater trunkline system that serves Seattle. The majority of wastewater collected from within Seattle is treated at the West Point plant, which is supported by the Brightwater plant near Woodinville if needed for additional capacity.

Inventory & Capacity

SPU operates a complex wastewater collection system network comprised of 1,423 miles of separated and combined sewer pipes and maintenance holes (MH), 68 pump stations (PS), and 86 permitted combined sewer overflow (CSO) outfalls in Puget Sound, Lake Washington, and the Duwamish Waterway. SPU acquires property, rights of way, and easements necessary for drainage and wastewater and environmental conservation as needed. Currently, no additional lands have been identified for drainage and wastewater purposes.

The combined sewer system is the oldest system conveying wastewater and drainage in Seattle, with infrastructure 100 years old or more in places. The combined sewer system collects wastewater from residents and businesses along with stormwater runoff from rooftops, yards, and streets into the same pipes, where it is then conveyed to the treatment plant. During periods of heavy rain, the system can overflow into waterbodies such as Lake Washington and Elliott Bay. While CSOs prevent wastewater treatment plants from being overwhelmed and prevent the wastewater system from backing up into roads and buildings, they contribute pollutants to receiving waterbodies. This degrades water quality, which impacts the aquatic life and habitat within these waterbodies and inhibits recreational opportunities.

In the separated sewer system wastewater from homes and businesses is collected through a separate set of pipes than stormwater. Wastewater is sent to the treatment plant while drainage collected from rooftops, yards, and streets is conveyed to waterbodies. Pollutants picked up by stormwater from rooftops and streets can impact water quality and the aquatic life in receiving waterbodies.

In the partially separated sewer system, stormwater runoff from the rooftops of older construction is collected along with wastewater from homes and businesses and conveyed through the

wastewater system to the treatment plant. As in the separated system, stormwater runoff from yards, streets, and new development is conveyed to waterbodies.

While the vast majority of SPU's drainage system is piped, Seattle has areas that are served by a predominantly 'informal' drainage system, particularly north of 85th Street and in the southwest corner of Seattle. These areas include blocks with no, or only limited drainage infrastructure and several miles of ditch and culvert systems. According to Seattle's Stormwater Code ditch and culvert systems are considered capacity constrained, meaning they have inadequate capacity for existing and anticipated stormwater loads (see Figure A-172).

Future Needs

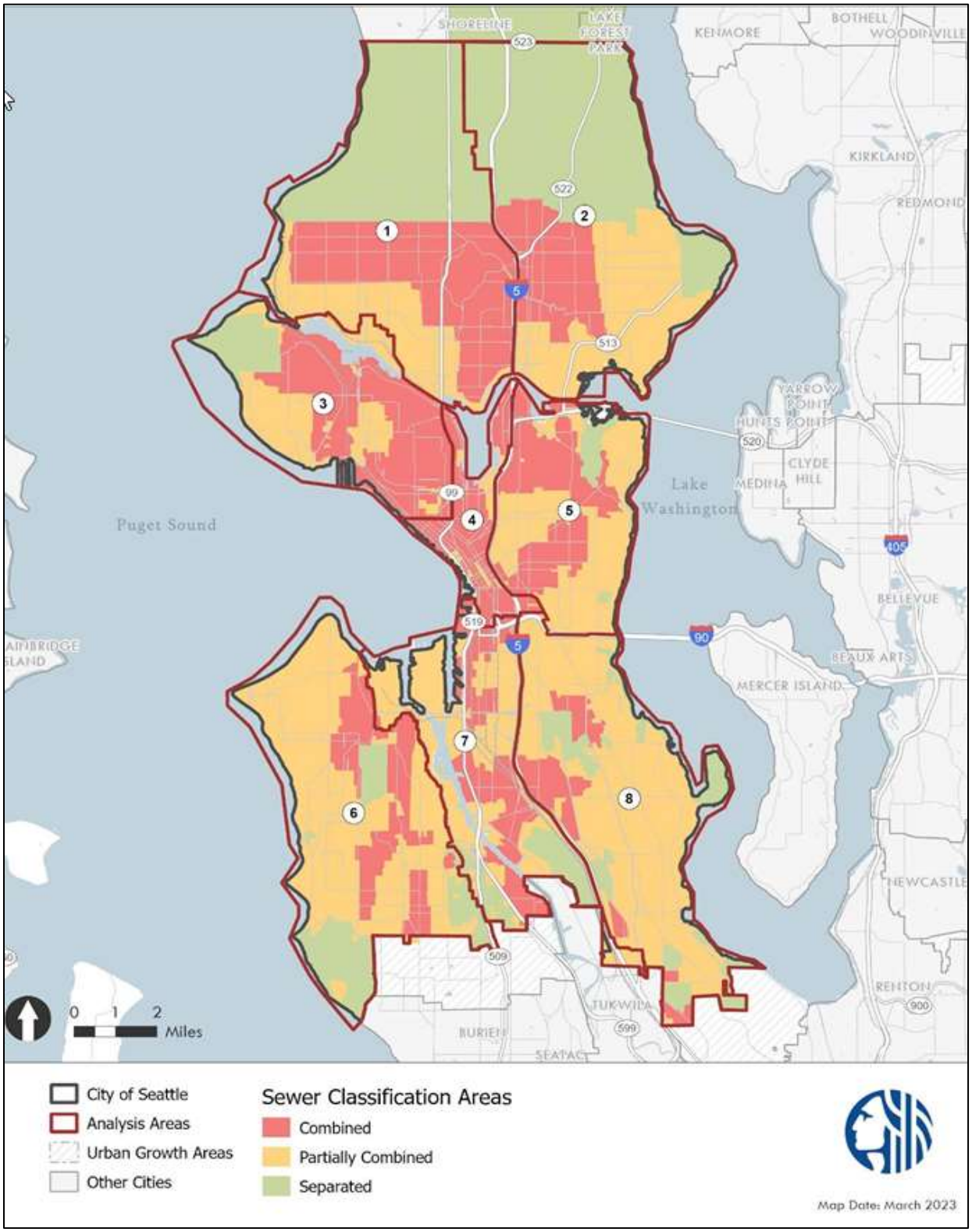
In 2019 SPU published a Wastewater System Analysis (WWSA) that identifies areas at risk due to limited wastewater system capacity, which can cause sewer overflows through maintenance holes or backups into homes or businesses. In 2020, SPU completed a Drainage Systems Analysis (DSA) that identified areas at greatest risk from limited drainage system capacity, which could cause flooding in the right-of-way or onto private property. The WWSA and DSA both used the best available growth and climate change projections at the time to assess how the identified risks might be impacted in the future. The WWSA and DSA modeled sewer and drainage system capacity under future conditions for the 2035 planning horizon and ran simulations to evaluate the potential changes in flooding, sewer overflows, and sewer back-ups caused by changes in impervious cover, stormwater code compliance, sea level rise, and more frequent and extreme rainfall events. The WWSA and DSA were developed to assess risks associated with system capacity citywide in order to prioritize SPU investments in sewer and drainage capacity improvements in the future.

Seattle Public Utilities and King County Wastewater Treatment Division are building an underground storage tunnel to significantly reduce the amount of polluted stormwater (from rain) and sewage that flows into the Lake Washington Ship Canal, Salmon Bay and Lake Union from Seattle's sewer system. The tunnel will improve water quality regionally by keeping more than 75 million gallons of polluted stormwater (from rain) and sewage from flowing into the Lake Washington Ship Canal, Salmon Bay and Lake Union on average each year. The project began construction in 2020 and is expected to be completed in 2027.

Every ten years King County Wastewater Treatment Division (WTD) updates its projections of wastewater flows and loads and evaluates their impact on overall treatment plant capacity. The latest projection, 2019 Treatment Plant Flows and Loadings Study, evaluated the capacity of its wastewater treatment plants in terms of handling overall volume of wastewater and stormwater flow in addition to the amount of organic and solids load (King County 2019). In its evaluation, the County used population estimates and projections based on 2013 PSRC forecasts, adjusted for the higher growth rate the region experienced between 2010 and 2016. Since 2014, WTD noted that influent loads were increasing at a faster pace than flows. Over the past few decades, water conservation efforts have reduced the amount of potable water used on a per capita basis. These reductions in water use directly impact the amount of wastewater flow, but do not impact the loads in the wastewater.

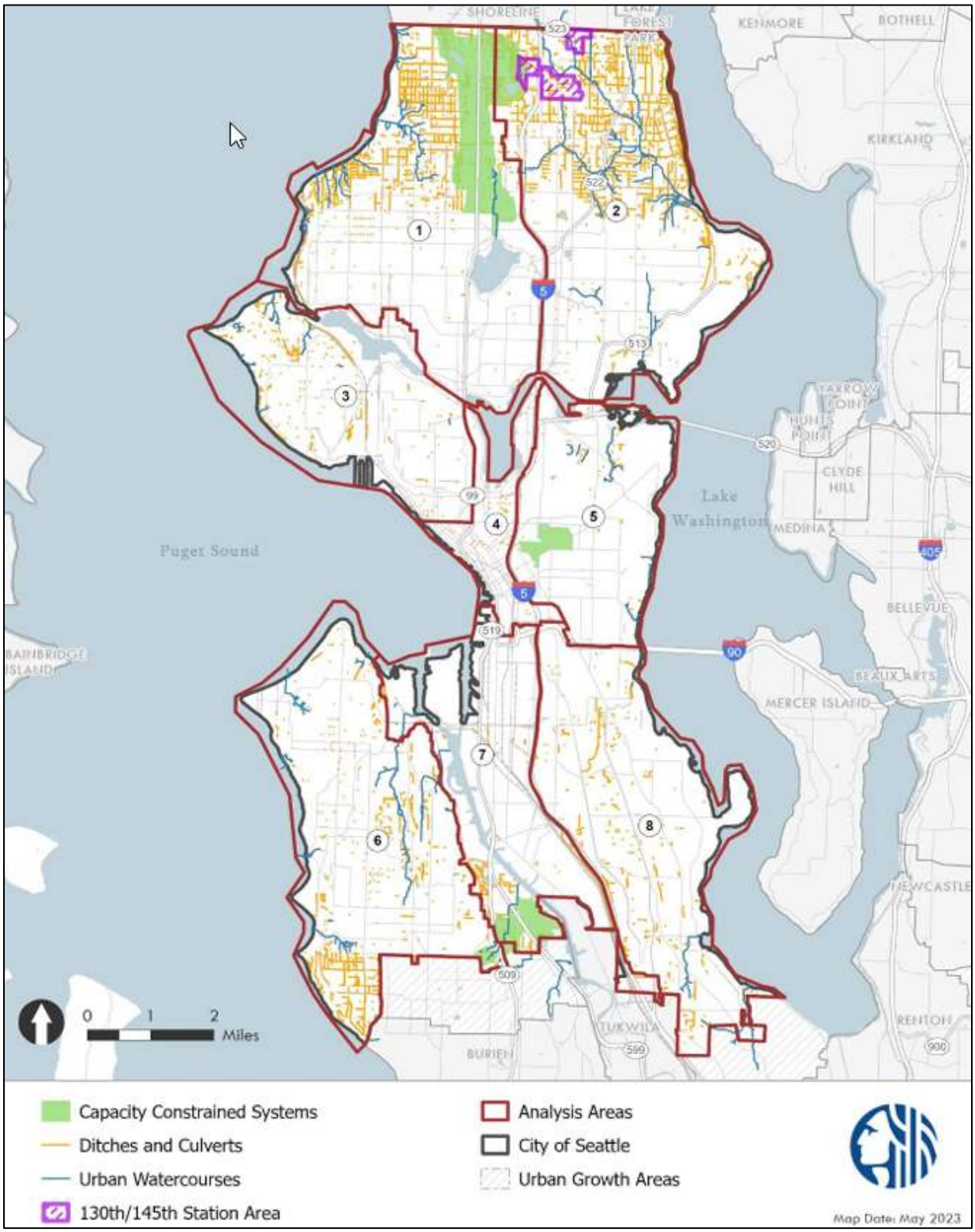
Based on the results, the West Point treatment plant is projected to be able to handle maximum month flow until 2050 but is already reaching capacity for maximum month loadings. In addition, the County will need to optimize treatment plant operations and ultimately invest in technical modifications to comply with the Puget Sound Nutrient General Permit, which became effective in January 2022. This may put further constraints on treatment plant capacity. WTD has several projects underway to increase capacity of sewerage pumps and is assessing projects to address capacity of its secondary system and digesters. No capacity limitations were projected to be reached between 2040 and 2060 at the West Point treatment plant.

Figure A-170
Drainage Areas by Type



Source: One Seattle Plan EIS, 2024

Figure A-171
Capacity Constrained Wastewater and Drainage System



Source: One Seattle Plan EIS, 2024

Solid Waste

The City of Seattle is required by state law to develop a comprehensive solid waste management plan and update it every six years. Seattle's 2022 Solid Waste Plan Update: Moving Upstream to Zero Waste (2022 Plan Update) guides how Seattle will manage and finance solid waste services and facilities over the next 5 years, and projects system management needs over 20 years.

Inventory & Capacity

The equipment and facilities necessary to operate Seattle's solid waste system are mostly provided by contracted services. SPU runs two transfer stations and two moderate-risk waste (MRW) collection facilities. Seattle provides the MRW collection service as a partner in King County's Local Hazardous Waste Management Program.

A network of public and private service providers and facilities collect, transfer, process, and landfill Seattle's discards. All Seattle's municipal solid waste that is not recycled or composted is, by law, under city control.

SPU contracts with private firms to collect residential garbage, recyclables, and yard and food waste (organics). The same contractors collect commercial garbage. Open-market providers collect commercial recycling and organics. Businesses may choose to "self-haul" their solid waste materials.

Transfer and recycling processing facilities consolidate collected solid waste materials and route them to their next destination. Garbage and organics collected by the city's contractors go to the transfer stations owned and operated by the City. Recycling picked up by the city's contractors goes to the City's contracted recycling processing facility. Recycling picked up from businesses may go to a recycling processor or one of the many local businesses specializing in recycled materials. Other collected materials go to the SPU's two transfer stations, or private transfer stations or processors. Occasionally, residential garbage is taken to private transfer facilities, such as when a city station temporarily needs to close.

At the SPU or private transfer stations, garbage is loaded into rail containers and trucked to Seattle's contracted rail yard. Assembled trains of containers are hauled to the city's contracted landfill. Processed recyclables go to various materials markets. Organics go to the City's contracted organics contractor to be processed into compost.

COLLECTION

Seattle contracts with two collection companies to collect all residential solid waste materials and commercial garbage. Current contracts started in April 2019 and run through March 2029. The companies provide all aspects of collection, including trucks, truck yards, and labor. Service areas and routes are planned to ensure efficient use of collection vehicles and to collect consistent amounts of material each day so that the daily capacity of each transfer station is not exceeded. Transfer and processing facilities need an even and predictable inflow to avoid having to stockpile incoming materials.

TRANSFER STATIONS

SPU owns and operates two transfer stations:

- North Transfer Station in the Wallingford neighborhood at 1350 N 34th St, Seattle
- South Transfer Station in the South Park neighborhood at 130 South Kenyon Street, Seattle

The transfer facilities now serve a variety of vehicles and customers and receive a range of discarded materials that include garbage, recyclables, and compostables. In addition to transferring materials delivered by the contracted collection companies, the stations play an important role in accepting materials unsuitable for curbside collection. Residents with large, bulky items or excess quantities can bring these materials to the stations for recycling or disposal. The stations also serve businesses that choose to self-haul their waste and recyclable materials.

In 2007, the Seattle City Council decided to proceed with improvements to the two SPU transfer stations which were originally built in the 1960s. SPU completed construction of the new South Transfer Station in 2013. The North Transfer Station redesign was completed in 2016.

Two private transfer stations, located in the Duwamish Manufacturing/Industrial Center, supplement City facilities.

King County and City of Seattle operate two hazardous and moderate risk waste facilities in the city of Seattle:

- North Household Hazardous Waste Facility 12550 Stone Avenue North, Seattle
- South Household Hazardous Waste Facility 8100 2nd Ave S, Seattle

RECYCLING AND COMPOSTING

SPU contracts with Rabanco Recycling Center for traditional recycling (newspaper, glass bottles, tin cans, etc.). It is located in the Duwamish Manufacturing/Industrial Center.

Most commercial recycling is provided by private arrangements. Vendors collect both mixed and source-separated materials and take them to a variety of processors in the Seattle area. Which processor they use depends on the material and any agreements haulers and processors may have.

For organics composting, SPU currently has contracts with two vendors, Lenz Enterprises, Inc., and Cedar Grove Composting, Inc.. Lenz Enterprises is mainly responsible for taking organics from SPU's Seattle's North Transfer Station to their processing facility in Stanwood, Washington. Cedar Grove takes mainly organics from SPU's South Transfer station to their processing facilities in Everett and Maple Valley.

DISPOSAL

SPU contracts with Waste Management of Washington for rail haul and disposal of all nonrecyclable waste at Columbia Ridge Landfill in Gilliam County, Oregon. After it has been compacted into shipping containers at transfer facilities, garbage is hauled to the Argo rail yard and loaded onto the train. The Argo Yard is owned and operated by the Union Pacific Railroad and is located in the Duwamish Manufacturing/Industrial Center.

Trains leave Seattle six times a week, stacked two-high. Waste Management of Washington owns the containers. The Columbia Ridge Landfill and Recycling Center is owned and operated by Oregon Waste Systems, a division of Waste Management.

Future Needs

As SPU contracts with private service providers for recycling processing, organics composting, and landfill long-haul and disposal, any programmatic changes would be made through those contracts. Since Public Health—Seattle & King County regulates all solid waste handling facilities in their jurisdiction, their approval is required for any new public or private facilities for the transfer, recycling, composting, and landfilling of solid waste materials.

Following a dip in waste generation during the COVID-19 pandemic, SPU expects overall generation of commercial, residential, and self-haul waste to rebound and to steadily increase over the next roughly 20 years. SPU forecasts waste generation using an econometric model that projects generation by sector. The projection for 2021—2040 is based model data from 2018, as well as some updates made in 2020. More details on solid waste forecasts can be found in the 2022 Plan Update, Chapter 3 Solid Waste Data and Trends.

SPU acquires property, rights of way, and easements necessary for solid waste services. Currently, no additional lands have been identified for solid waste purposes.

Figure A-172
Solid Waste Forecasts

YEAR	COMMERCIAL	SINGLE-FAMILY RESIDENTIAL	SELF HAUL	MULTI-FAMILY RESIDENTIAL	OVERALL CITYWIDE
Amount of Waste Generated					
2020 (actual)	286,036 tons	232,038 tons	109,844 tons	83,701 tons	711,619 tons
2040 (forecast)	451,644 tons	241,343 tons	117,656 tons	110,411 tons	921,053 tons
Recycling Rates					
2019 (actual)	62.1%	72.0%	11.1%	36.2%	54.4%
2040 (forecast)	78.0%	83.1%	17.2%	56.5%	69.0%

Source: SPU Seattle 2022 Solid Waste Plan Update

Although the overall amount of waste generated in the city will increase with projected residential and employment growth over the twenty-year plan horizon, the percentage of waste that will be directed to disposal is expected to decrease if the plan's waste prevention and recycling recommendations are implemented (see Figure A-173).

Historically, recycling rate goals have driven Seattle's solid waste program. However, SPU is shifting to focus more on waste prevention and diversion and working upstream to curb carbon emissions and preserve natural resources as much as possible. The 2022 Plan Update emphasizes waste prevention for the greatest environmental impact and began in 2023 to develop new metrics for measuring policy, programming, and environmental impacts.

Shifts in consumer patterns change over time. Likewise, new materials and combinations of materials continue to enter the consumption cycle. SPU will conduct waste composition analyses frequently enough to be able to respond to these changes. For example, SPU will continue to work with processors to designate additional recyclable materials and modify collection programs as needed.

Seattle will be able to accommodate expected increases in solid waste service and higher rates of diversion of waste to diversion and recycling through regular contract renegotiation, ongoing maintenance and upkeep of city-owned transfer stations and continued public education. Fees charged to residential and commercial customers from Seattle Public Utilities and from waste haulers directly support the necessary capital investments needed to ensure minimum levels of service.

COLLECTION

Seattle will continue with its strategy to competitively contract for collection services. The contractors will adjust to changing service needs, such as more recycling or more residential and commercial customers, over time.

TRANSFER STATIONS

The capacity provided by the rebuild of Seattle's two transfer facilities, in conjunction with private transfer capacity, is projected to satisfy Seattle's solid waste transfer needs for at least as long as the fifty-year expected life of the rebuilt facilities. Seattle's new facilities are purposely designed for flexibility in response to a changing mix of solid waste materials over time.

RECYCLING AND COMPOSTING

Recycling capacity at private facilities is considered adequate for at least two decades, and Seattle will continue to contract for these services. Seattle's current contract is guaranteed through 2029. In 2014, Recology Cleanscapes opened a new high-capacity mixed-material recycling facility in the Duwamish Manufacturing/Industrial Center. Furthermore, the Washington State Department of Ecology currently lists more than 280 recycling facilities in King, Pierce, and Snohomish Counties. In addition to the new Recology Cleanscapes facility, at least three of these are large facilities that process mixed recycling and are within twenty miles of Seattle. SPU expects that many other private recyclers that handle limited ranges of materials will continue their presence in the local market.

Current composting capacity is adequate for the anticipated growth of the twenty-year planning horizon. However, statewide there is concern about future capacity as more cities and counties divert more organics. Seattle's two organics contracts have been in effect for six years, April 2024 through March 2030. As regional demand for composting increases, composting service providers are researching and developing new technologies, for example anaerobic digestion.

DISPOSAL

Columbia Ridge landfill, Seattle's current contracted landfill, projects that it will be able to receive material beyond the current contract's guaranteed 2028 end date. Seattle plans to continue with contracting for this service. Although Seattle's disposal alternatives are restricted through the life of the contract, the City will continue monitoring emerging alternate technologies. Rail-haul capacity is sufficient through the planning horizon. The rail-haul contract provides for alternate transportation if rail lines become unavailable.

For a complete inventory of private solid waste contractors and facilities, see Chapter 7 of the Seattle 2022 Solid Waste Plan Update.

Natural Gas

Natural gas services for Seattle residents and businesses are provided by Puget Sound Energy (PSE), Washington State's largest and oldest utility. PSE serves more than 870,000 residential, commercial, and industrial natural gas customers in six counties through more than 26,000 miles of PSE-owned gas mains and service lines. Currently, PSE serves over 140,000 natural gas customers within the City of Seattle.

PSE controls its gas-supply costs by acquiring gas, under contract, from a variety of gas producers and suppliers across the western United States and Canada. About half the gas is obtained from producers and marketers in British Columbia and Alberta, and the rest comes from Rocky Mountain states. Once PSE takes possession of the gas, it is distributed to customers through more than 26,000 miles of gas mains and service lines. Supply mains then transport the gas from the gate stations to district regulators where the pressure is reduced to less than 60psig. Distribution mains are fed from the district regulators, and individual residential service lines are fed by the distribution mains.

Historically, PSE develops or updates a plan called an Integrated Resource Plan every two years that evaluates how a range of potential future outcomes could affect PSE's ability to meet customers' natural gas supply needs. This is a time of extraordinary change for PSE as they confront the challenge of climate change and work towards decarbonizing services. New legislation and regulations to reduce greenhouse gas emissions affecting PSE's natural gas utility include:

Clean Energy Transformation Act which commits Washington to an electricity supply free of greenhouse gas emissions by 2045 (effective May 7, 2019);

Climate Commitment Act that caps and reduces greenhouse gas emissions from the largest emitting sources and industries (effective January 1, 2023);

Updated Seattle building code efficiency improvements (effective Nov 2024);

Washington Decarbonization Act for Large Combination Utilities which consolidates the planning processes into a single integrated system plan due July 1, 2027 (80.86 RCW, March 2024); and

Various incentives to switch from natural gas to electricity from the Inflation Reduction Act (IRA) and other Seattle programs and regulations.

Natural gas energy use in PSE's service area is declining — down 7% for residential and 3% for commercial in 2023 and PSE forecasts a continued decline over the next five years. This is driven by a number of factors including building and energy code changes, the elimination of allowances for gas line extensions, continued energy efficiency, and warmer winters on average that mean less demand for heating. Also included is a proposal to accelerate depreciation of the existing natural gas delivery system to help protect against an undue share of the cost burden falling on an increasingly smaller group of customers, particularly those who can least afford it. PSE continues to prioritize investments in the safety and reliability of the natural gas delivery system.

PSE does not currently have any major capital projects planned in Seattle. However, PSE is implementing a pipeline safety improvements with the replacement of approximately 35 miles of large diameter (1 ¼" and larger) DuPont Aldyl "HD" plastic pipe in Seattle by 2032.

Telecommunications

Telecommunications is a broad term applied to different types of technology and communication services that provide and receive data/information to homes, businesses, and individuals, as well as public facilities and infrastructure. Services are delivered over wired and wireless networks and include internet, landline and mobile telephone services, cable television, over-the-air television, radio, and emergency communications. Telecommunications are primarily regulated at the federal level by the Federal Communications Commission (FCC). The City regulates limited aspects of these services, such as the siting of new facilities through its public right-of-way and land use regulations.

Residential and commercial services are provided by private telecommunications companies that own and maintain networks of coaxial cable, fiber, and cellular/wireless technologies ("carriers") in the city. Services to the public are also offered by satellite companies and those that lease use of other carriers' networks. For example, mobile *virtual* network operators (MVNO) are mobile service providers that use the cellular networks of major carriers (AT&T, T-Mobile, Verizon and Dish). Businesses, governments and institutions can also buy services and design custom solutions from private carriers to meet their telecommunication needs. The City does use some services and network capacity from private carriers but has steadily reduced this with an increased network of public infrastructure to City-owned buildings.

The City owns and maintains a public infrastructure network to provide specific telecommunications services to support City operations and other public agency service delivery. The Seattle Information Technology Department, in collaboration with City Light and other departments, jurisdictions, and institutions, installs, owns, and/or operates an extensive broadband information and communications technology (ICT) infrastructure, including radio (AM 1111) for emergency services and fieldwork, and fiber optic for transmission of voice, video, and data for delivery of city services. The infrastructure is used to support municipal and public sector services. The City has a fiber-sharing agreement with other public agencies that enables joint installation and maintenance of an extensive network of conduit and fiber, which minimizes the construction cost, digging, and installation of telecommunications infrastructure. The City also, in limited cases, leases excess fiber capacity to private providers.

Seattle is a major partner in, and user of, the new Puget Sound Emergency Radio Network (PSERN) regional governmental radio system. The PSERN system supports nearly 6,000 Seattle police, fire, and general government radios. Seattle also operates a number of additional radio and microwave networks to meet a variety of departmental needs for internal communications. Seattle City Light operates its own separate radio system for its internal radio communication needs.

City departments and telecommunications companies cooperate to provide efficient and stable processes for deploying telecommunications infrastructure, including infrastructure that will support high-capacity broadband, and next generation wireless (5th Generation or "5G") network technologies. Seattle City Light issues a permit for each installation of telecommunications (e.g., fiber lines, wireless facilities) on utility owned poles (e.g., wood and metal utility poles, light poles). The Seattle Department of Transportation also issues a permit for the installation of telecommunications facilities in the public right-of-way. The Seattle Department of Constructions and Inspections issues a

permit for the installation of wireless facilities (“minor telecommunication facilities”) on private properties, such as building rooftops. As of 2024, the City has identified multiple telecommunication service providers in Seattle (see Figure A-174).

New communication technologies will continue to evolve. The City will continue to work with providers and permit new technologies to increase consumer options and ensure new technologies are deployed equitably.

Figure A-173
Telecommunication Service Providers (as of September 2024)

	Internet/Data Service					TV Service		Telephone Service			Fiber Infrastructure
Company	Hybrid Cable/ Fiber Network	Fiber Network	Cellular (Mobile) Network	Satellite Network	Fixed Wireless Network	Cable TV	Satellite TV	Legacy Copper Network	Voice Over IP (VOIP)	Cellular (Mobile) Network	Fiber Supporting Other Commercial Providers
Comcast/ Xfinity	X					X			X		
Lumen/ Quantum/ CenturyLink	X	X						X	X		X
Astound Broadband	X	X				X			X		X
T-Mobile			X		X					X	
Verizon			X		X					X	
AT&T			X							X	
Dish Networks			X				X			X	
Atlas Networks					X						
Google Fiber					X						
Salmon Bay Wireless					X						
DirectTV							X				
Starlink				X							
HughesNet				X							
Viasat				X							
Crown Castle											X
Extenet											X
Zayo Group											X
Ziply*		X									X
Mobile *Virtual* Network Operators (MVNO)#			X							X	

* Commercial non-residential services.

There are over 100 MVNOs operating in the United States. Example MVNOs available to Seattle customers are Boost Mobile, Cricket Wireless, Metro PCS, Mint Mobile, Straight Talk Wireless, and TracPhone. MVNOs lease access to infrastructure built and maintained by telecommunications networks owned and maintained by major carriers (T-Mobile, AT&T, Verizon, and Dish).

Source: Seattle Information Technology, 2024

Appendix 5
Legislative History of the Comprehensive Plan

Ordinances Amending the Comprehensive Plan

ADOPTION DATE	ORDINANCE #	NATURE OF AMENDMENTS
12/12/94	117436	1994 Capital Improvement Program
7/31/95	117735	1995 Comprehensive Plan amendments
11/27/95	117906	Adoption of a new Human Development element
12/12/94	117436	1994 Capital Improvement Program
7/31/95	117735	1995 Comprehensive Plan amendments
11/27/95	117906	Adoption of a new Human Development element
11/27/95	117915	1995 Six-Year CIP amendments
7/01/96	118197	Response to 4/2/96 Growth Management Hearings Board remand. Repealed policy L-127 of Ord. 117735
9/23/96	118408	Addition of Shoreline Master Program to Plan
11/18/96	118388	1996 CIP amendments
11/18/96	118389	1996 annual amendments
6/16/97	118622	Policies for the reuse of Sand Point Naval Station
9/8/97	118722	Response to 3/97 GMHB remand
11/13/97	118820	1997 Six-Year CIP amendments
11/13/97	118821	1997 annual amendments; addition of Cultural Resources element

ADOPTION DATE	ORDINANCE #	NATURE OF AMENDMENTS
6/22/98	119047	Adoption of the Ballard/Interbay Northend Manufacturing/Industrial Center neighborhood plan
8/17/98	119111	Adoption of the Crown Hill/Ballard neighborhood plan
10/26/98	119207	1998 annual amendments
11/02/98	119217	Adoption of the Wallingford neighborhood plan
11/02/98	119216	Adoption of the Central Area neighborhood plan
11/16/98	119231	Adoption of the Pioneer Square neighborhood plan
11/16/98	119230	Adoption of the University neighborhood plan
11/23/98	119264	1998 Six-Year CIP amendments
12/07/98	119322	Adoption of the Eastlake neighborhood plan
12/14/98	119298	Adoption of the MLK@Holly neighborhood plan
12/14/98	119297	Adoption of the Chinatown/International District neighborhood plan
1/25/99	119356	Adoption of the South Park neighborhood plan
2/08/99	119365	Adoption of the Denny Triangle neighborhood plan
6/22/98	119047	Adoption of the Ballard/Interbay Northend Manufacturing/Industrial Center neighborhood plan
8/17/98	119111	Adoption of the Crown Hill/Ballard neighborhood plan
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ADOPTION DATE	ORDINANCE #	NATURE OF AMENDMENTS
12/14/98	119297	Adoption of the Chinatown/International District neighborhood plan
1/25/99	119356	Adoption of the South Park neighborhood plan
2/08/99	119365	Adoption of the Denny Triangle neighborhood plan
3/15/99	119401	Adoption of the South Lake Union neighborhood plan
3/15/99	119403	Adoption of the Queen Anne neighborhood plan
3/22/99	119413	Adoption of the Pike/Pine neighborhood plan
3/22/99	119412	Adoption of the First Hill neighborhood plan
5/10/99	119464	Adoption of the Belltown neighborhood plan
5/24/99	119475	Adoption of the Commercial Core neighborhood plan
6/07/99	119498	Adoption of the Capitol Hill neighborhood plan
7/06/99	119524	Adoption of the Green Lake neighborhood plan
7/06/99	119525	Adoption of the Roosevelt neighborhood plan
7/09/99	119538	Adoption of the Aurora-Licton neighborhood plan
7/21/99	119506	Adoption of the West Seattle Junction neighborhood plan
8/23/99	119615	Adoption of the Westwood/Highland Park neighborhood plan
8/23/99	119614	Adoption of the Rainier Beach neighborhood plan
9/07/99	119633	Adoption of the North Neighborhoods neighborhood plan
9/07/99	119634	Adoption of the Morgan Junction neighborhood plan
9/27/99	119671	Adoption of the North Rainier neighborhood plan
10/04/99	119685	Adoption of the Broadview/Bitter Lake/Haller Lake neighborhood plan
10/04/99	119687	Adoption of the Fremont neighborhood plan
10/11/99	119694	Adoption of the Columbia City neighborhood plan
10/25/99	119713	Adoption of the North Beacon Hill neighborhood plan

ADOPTION DATE	ORDINANCE #	NATURE OF AMENDMENTS
10/25/99	119714	Adoption of the Admiral neighborhood plan
11/15/99	119743	Adoption of the Greenwood/Phinney Ridge neighborhood plan
11/15/99	119744	1999 annual amendments
11/22/99	119760	1999 Six-Year CIP amendments
12/06/99	119789	Adoption of the Delridge neighborhood plan
2/07/00	119852	Adoption of the Georgetown neighborhood plan
6/12/00	119973	Adoption of the Greater Duwamish Manufacturing/Industrial Center neighborhood plan
11/13/00	120158	Response to Growth Management Hearings Board remand; Greenwood/Phinney Ridge neighborhood plan
12/11/00	120201	2000 five-year Comprehensive Plan review amendments
10/15/01	120563	2001 annual amendments
12/09/02	121020	2002 annual amendments
12/13/04	121701	2004 ten-year Update to Comprehensive Plan
10/10/05	121955	2005 annual amendments
12/11/06	122313	2006 annual amendments
12/17/07	122610	2007 annual amendments
10/27/08	122832	2008 annual amendments
3/29/10	123267	2010 annual amendments
4/11/11	123575	2011 annual amendments
4/10/12	123854	2012 annual amendments
5/20/13	124177	2013 annual amendments
5/2/14	124458	2014 annual amendments

ADOPTION DATE	ORDINANCE #	NATURE OF AMENDMENTS
10/16/15	124886,124887, 124888	2015 annual amendments including the adoption of new housing and job targets, and incorporate changes relating to housing affordability.
10/28/2016	125173	2016 Seattle 2035 Update to Comprehensive Plan
10/5/2017	125428	2017 annual amendments
12/14/2018	125732	2018 annual amendments
3/20/2019	125790	2019 annual amendments
10/2/2020	126186	2020 annual amendments
10/15/2021	126456, 126457	2021 annual amendments
12/15/2022	126730	2022 annual amendments
7/25/2023	126861	2023 annual amendments

Resolutions related to the Comprehensive Plan

PASSAGE DATE	RESOLUTION #	NATURE OF LEGISLATION
7/25/94	28962	1994 Vision for the Comprehensive Plan
11/27/95	29215	Updated 1994 Vision to reflect addition of Human Development element in Comprehensive Plan (Ord. 117906)
12/11/00	30252	Updated Vision to reflect Cultural Resources and Environment elements and adoption of neighborhood plans
12/13/04	30727	Updated Vision in conjunction with the 2004 ten-year Update to the Comprehensive Plan
2/6/2013	31418	Intent to work with communities to review and implement neighborhood plans in the Neighborhood Planning Element of the Comprehensive Plan
5/15/15	31577	Confirmed race and social equity as a core value of the Comprehensive Plan
7/27/2022	32059	City of Seattle's intent to address climate change and improve resiliency as part of the One Seattle update to the Comprehensive Plan
9/20/2022	32068	Consider proposed annual amendments as part of the One Seattle update to the Comprehensive Plan and the Seattle Transportation Plan

Mayor Harrell's
ONE SEATTLE PLAN
COMPREHENSIVE PLAN UPDATE

Subarea Plans

Regional Center Subarea Plans

This section is reserved for adopted subarea plans for the seven Regional Centers identified in the One Seattle Plan Growth Strategy element. Each of the subarea plans is adopted separately as part of the City's Comprehensive Plan. The subarea plans, which are intended to meet the planning requirements for regional designation as Regional Growth Centers by the Puget Sound Regional Council, will include the following:

Downtown Regional Center Subarea Plan (Pending future adoption)

First Hill/Capitol Hill Regional Center Subarea Plan (Pending future adoption)

Northgate Regional Center Subarea Plan (Pending future adoption)

South Lake Union Regional Center Subarea Plan (Pending future adoption)

Uptown Regional Center Subarea Plan (Pending future adoption)

University District Regional Center Subarea Plan (Pending future adoption)

Ballard Proposed Regional Center Subarea Plan (Pending future designation and adoption)

Manufacturing and Industrial Center Subarea Plans

This section is reserved for adopted subarea plans for the two Manufacturing and Industrial Centers identified in the One Seattle Plan Growth Strategy element. Each of the subarea plans is adopted separately as part of the City's Comprehensive Plan. The subarea plans, which are intended to meet the planning requirements for regional designation as Regional Manufacturing and Industrial Centers by the Puget Sound Regional Council, will include the following:

Greater Duwamish Manufacturing and Industrial Center Subarea Plan (Pending future adoption)

Ballard–Interbay–Northend Manufacturing and Industrial Center Subarea Plan (Pending future adoption)

SUMMARY and FISCAL NOTE

Department:	Dept. Contact:	CBO Contact:
OPCD	Michael Hubner	Christie Parker

1. BILL SUMMARY

Legislation Title: AN ORDINANCE relating to land use and zoning; repealing and replacing the Seattle Comprehensive Plan pursuant to a major update, with new goals, policies, and elements and a new Future Land Use Map; amending Sections 5.72.020, 5.72.030, 5.73.030, 6.600.040, 22.805.070, 23.34.007, 23.34.008, 23.34.009, 23.34.010, 23.34.011, 23.34.012, 23.34.014, 23.34.018, 23.34.020, 23.34.024, 23.34.028, 23.34.074, 23.34.076, 23.34.078, 23.34.080, 23.34.082, 23.34.086, 23.34.099, 23.34.100, 23.34.108, 23.34.110, 23.34.128, 23.40.070, 23.41.004, 23.41.012, 23.42.058, 23.44.019, 23.45.509, 23.45.510, 23.45.514, 23.45.516, 23.45.527, 23.45.530, 23.45.532, 23.45.550, 23.47A.004, 23.47A.005, 23.47A.008, 23.47A.009, 23.47A.012, 23.47A.013, 23.48.002, 23.48.021, 23.48.220, 23.48.221, 23.48.225, 23.48.245, 23.48.250, 23.48.285, 23.48.290, 23.48.602, 23.48.605, 23.48.610, 23.48.623, 23.48.690, 23.48.710, 23.48.720, 23.48.723, 23.48.740, 23.48.780, 23.48.785, 23.48.802, 23.48.905, 23.48.940, 23.49.012, 23.49.019, 23.49.036, 23.50.012, 23.50A.040, 23.50A.190, 23.50A.360, 23.51A.004, 23.52.004, 23.52.008, 23.53.006, 23.54.015, 23.54.016, 23.54.020, 23.54.035, 23.58A.014, 23.58A.024, 23.58A.040, 23.58A.042, 23.58B.040, 23.58B.050, 23.58C.040, 23.58C.050, 23.69.022, 23.69.026, 23.69.035, 23.71.020, 23.74.002, 23.84A.025, 23.84A.026, 23.84A.032, 23.84A.038, 23.84A.040, 23.84A.042, 23.86.006, 25.05.164, 25.05.665, and 25.05.800 of the Seattle Municipal Code; and amending the title of Sections 23.48.230, 23.48.235, 23.48.240, 23.48.255, and 23.48.280 of the Seattle Municipal Code.

Summary and Background of the Legislation: The state Growth Management Act (GMA) requires local jurisdictions to update their Comprehensive Plans every 10 years to accommodate growth for the succeeding 20-year planning period and to update goals and policies to be consistent with the requirements of the GMA. Seattle last adopted a major update of its Comprehensive Plan in 2015.

This legislation repeals and replaces the entire Comprehensive Plan. The Comprehensive Plan for the planning period 2024-2044 (called the "One Seattle Plan") includes a revised growth strategy and future land use map that includes new and expanded areas for residential development to meet the need for housing supply and diversity. The growth strategy would continue to focus new housing and jobs within Urban Centers and Villages (renamed Regional and Urban Centers respectively). Other modifications to the growth strategy include the following.

A new **Regional Centers** section:

- Designates Ballard as a Regional Center
- Expands the boundary of the Uptown Regional Center to encompass a full half-mile walkshed around planned new light rail stations

- Expands the First Hill-Capitol Hill Urban Center to include a portion of the Squire Park area
- Updates 20-year growth estimates for Regional Centers

A new **Urban Centers** section:

- Adds a new Pinehurst-Haller Lake Urban Center around the future NE 130th St. Link light rail station
- Expands the boundaries of 8 Urban Centers to encompass areas within walking distance of light rail and to increase the size of small centers consistent with regional standards for Countywide Centers
- Divides several larger Urban Centers into multiple centers consistent with standards for Countywide Centers

A new **Neighborhood Centers** section:

- Creates a new Neighborhood Center place type defined as small areas of moderate density housing (3 to 6 stories) within a short walk (approximately 4 minutes) of an existing neighborhood commercial node and/or bus rapid transit stop
- Identifies a total of 30 new Neighborhood Centers in areas across the city
- The current South Park Urban Village is redesignated as a Neighborhood Center with an accompanying boundary change

A new **Urban Neighborhood** section:

- Merges the current FLUM designations of Single-family, Multi-family, and Commercial into a new Urban Neighborhood designation
- Urban Neighborhood includes predominantly areas zoned Neighborhood Residential, where a wider range of housing types will be allowed consistent with new state requirements in House Bill 1110 (HB1110)
- Within Urban Neighborhoods, the element also states that higher density housing may be appropriate along frequent transit arterials and in areas already zoned for higher densities

Other key changes in the One Seattle Plan are modifications to goals and policies in multiple elements to ensure compliance with state and regional policies, to support the updated growth strategy, and to promote race and social equity. A revised Transportation element of the One Seattle Plan aligns with the recently adopted Seattle Transportation Plan and includes new multimodal transportation measures. An expanded Housing element and appendix of the One Seattle Plan addresses new requirements to plan for and accommodate housing for all economic segments enacted with House Bill 1220 (HB 1220). The One Seattle Plan adds a new Climate and Environment element that responds to new requirements of GMA enacted by House Bill 1181 (HB 1181). The One Seattle Plan removes the Neighborhood Plans section of the Comprehensive Plan and includes a placeholder section for new Regional Center Subarea Plans that will be adopted in the future. The update removes the Community Well-Being as a separate element and moves many policies to other elements. Finally, the update also removes the Growth Strategy and Land Use appendices with key data now addressed in an expanded Housing appendix.

2. CAPITAL IMPROVEMENT PROGRAM

Does this legislation create, fund, or amend a CIP Project? ☐ **Yes** ☒ **No**

3. SUMMARY OF FINANCIAL IMPLICATIONS

Does this legislation have financial impacts to the City? ☐ **Yes** ☒ **No**

3.d. Other Impacts

Does the legislation have other financial impacts to The City of Seattle, including direct or indirect, one-time or ongoing costs, that are not included in Sections 3.a through 3.c? If so, please describe these financial impacts.

The Comprehensive Plan is a 20-year growth management blueprint for how the City will accommodate and serve growth in the next twenty-year timeframe. This framework directs coordinated City investments in facilities and services to meet demand from anticipated growth of 80,000 households and 158,000 jobs. Growth can result in costs to serve the needs of households and businesses and it can also increase revenues due to an increased tax base. The impact of the Plan, specifically the growth strategy, is to identify where new growth will occur over time through planned land uses and densities of development. This information provides a common framework for all, including for multiple departments, to plan for needed infrastructure and services, resulting in greater coordination and opportunities for efficiencies. The changes to the growth strategy in the One Seattle Plan also provide significant additional zoned capacity for housing development, including in new areas planned for growth, such as new and expanded centers, new Neighborhood Centers, and in all neighborhoods in the form of middle housing consistent with HB 1110. If the city grows at a rate that is higher or occurs faster than that anticipated in the Plan based on the targets adopted under GMA, additional financial impacts could result, the net impact of which is unknowable at this time.

The updated growth strategy in the One Seattle Plan includes significant changes to the Future Land Use Map (FLUM). The FLUM changes will be implemented through separate zoning legislation. Developing the zoning legislation itself is already included in OPCDs budgeted work plan. Adoption of changes to the FLUM will result in costs to Seattle Department of Construction and Inspections (SDCI) and the Seattle Information Technology department (IT) to incorporate the new map and growth strategy into mapped data that is included in or supports our land use regulations in City code. SDCI and IT will also incur indirect costs to update data related to the zoning maps that implement the growth strategy. Any additional impacts for updating data or procedures related to zoning will be addressed in fiscal notes accompanying the forthcoming rezone legislation.

If the legislation has costs, but they can be absorbed within existing operations, please describe how those costs can be absorbed. The description should clearly describe if the absorbed costs are achievable because the department had excess resources within their existing budget or if by absorbing these costs the department is deprioritizing other work that would have used these resources.

The One Seattle Plan is a policy document that informs City departments' future work plans to provide services and facilities that will support growth over time. Many of these investments will be provided within the scope of existing department operations. As noted, the One Seattle Plan provides policy direction that can result in efficiencies and coordination across departments as they plan their work. Adoption of the Plan, along with adoption of zoning legislation to implement the revised growth strategy, does not immediately result in costs to departments, other than SDCI and IT (discussed above), but will inform future budgeting to meet the needs of a growing city.

Please describe any financial costs or other impacts of *not* implementing the legislation.

There is no direct financial impact of not adopting and implementing the legislation. However, updating the Comprehensive Plan is a state requirement. If not adopted, the City could be challenged at the Growth Management Hearings Board which could result in a penalty of losing access to certain state grants and funding sources. The Puget Sound Regional Council also requires that cities maintain an updated plan to maintain access to certain federal transportation funds.

4. OTHER IMPLICATIONS

a. Please describe how this legislation may affect any departments besides the originating department.

The Comprehensive Plan provides policy direction for many aspects of City operations. Its policies affect activities conducted by the Seattle Department of Transportation (SDOT), Office of Housing (OH), Seattle Public Utilities (SPU), Seattle City Light (SCL), Office of Sustainability and the Environment (OSE), SDCI, Office of Economic Development (OED), Seattle Parks and Recreation (SPR), and others.

The Comprehensive Plan provides broad guidance to several departments that have roles in managing or serving development. To the extent that projected development would occur at a faster rate than had previously been estimated, some capital departments, such as SDOT and SPU, may experience an increased need for their services and for additional infrastructure planning.

b. Does this legislation affect a piece of property? If yes, please attach a map and explain any impacts on the property. Please attach any Environmental Impact Statements, Determinations of Non-Significance, or other reports generated for this property.

Adoption of this legislation will change the Future Land Use Map (FLUM) designation for most property outside of existing Urban Centers and Urban Villages. The FLUM establishes

future land use designations that will be implemented through rezoning actions. Future rezone legislation would have to be adopted for any parcels to be directly affected.

Comprehensive Plan policies and the FLUM provide general guidance for where particular land uses and densities will be allowed in the city. Separate legislation to implement the Plan through zoning changes in areas across the city is forthcoming.

c. Please describe any perceived implication for the principles of the Race and Social Justice Initiative.

i. How does this legislation impact vulnerable or historically disadvantaged communities? How did you arrive at this conclusion? In your response please consider impacts within City government (employees, internal programs) as well as in the broader community.

Addressing race, social justice, and equity was a major goal of the Comprehensive Plan update process. OPCD used the City's Racial Equity Toolkit framework to do this work. The work involved enhanced engagement with historically underrepresented communities and a Racial Equity Analysis of the current Seattle 2035 Plan and Urban Village strategy. The Plan includes many new goals and policies in multiple elements that further race and social justice. The proposed growth strategy is expressly designed to increase housing supply to reduce market pressure resulting in displacement pressures on Black, Indigenous, and people of color and low income households. The growth strategy includes support for development of middle housing and higher densities in areas of the city that have historically been exclusionary in their zoning. Affordable housing policies support increased production of income-restricted housing. New and expanded policies in multiple elements support efforts by the City to explicitly mitigate displacement. The Plan also includes additional analysis of historical and ongoing racial inequities, particularly as documented in the Housing appendix in response to the requirements of HB 1220. The Plan will be adopted through this piece of legislation.

The Environmental Impact Statement for the One Seattle Plan also includes an equity analysis for each element of the environment studied. Particular attention was given to how environmental impacts affect vulnerable or historically disadvantaged communities and the identification of relevant mitigation measures.

ii. Please attach any Racial Equity Toolkits or other racial equity analyses in the development and/or assessment of the legislation.

In 2021, OPCD contracted with PolicyLink, a national research and action institute, to conduct a Racial Equity Analysis that gathered community feedback on how the Seattle 2035 Comprehensive Plan and its Urban Village Strategy had met its racial equity goals and could be improved to further advance equity. The report set the stage for later work on the One Seattle Plan.

The Housing appendix in the Plan includes detailed sections on the history of racial disparities and exclusion in housing in Seattle as well as data that show ongoing racial disparities in housing that are addressed in the goals and policies in the One Seattle Plan.

iii. What is the Language Access Plan for any communications to the public?

OPCD prioritized translations of key documents across all phases of engagement in Seattle's Tier 1 languages: Traditional Chinese, Spanish, Vietnamese, Somali, Amharic, Korean, and Tagalog. During Phase 1 and 2 engagement, all Issue Briefs were translated into Tier 1 languages and Khmer. The Engagement Hub was also fully accessible in Tier 1 languages. OPCD partnered with a cohort of 10 Community Liaisons, who provided language support at in-person and virtual information sessions as well as focus groups, during formal comment periods, and during in-person open houses and information sessions. Five of our community-based organization partners conducted in-language outreach to the communities they regularly serve. OPCD offered interpreters and Community Liaisons at in-person engagement events & pop ups, such as HSD's Age Friendly Seattle & Free Summer Meals program events and DON's People's Academy for Community Engagement (PACE) program events. During Phase 3 and 4 engagement, the Draft Growth Strategy Summary and the Mayor's Growth Strategy Summary were translated into Tier 1 languages. Across all phases of engagement, OPCD publicized a contact for interpretation and accessibility requests, and provided interpretation on request, including for Spanish and ASL.

d. Climate Change Implications

i. Emissions: How is this legislation likely to increase or decrease carbon emissions in a material way? Please attach any studies or other materials that were used to inform this response.

The Plan includes a new Carbon Pollution Reduction subelement that includes goals and policies to reduce carbon emissions from the following sectors: transportation, development pattern, buildings and energy, solid waste. This subelement reflects the framework of state legislation, HB 1181, passed in 2023. The subelement includes an overall goal to reduce Seattle's core greenhouse gas emissions by 58 percent from 2008 levels by 2030 and attain carbon neutrality by 2050. These goals and policies will be implemented though more specific action plans created or updated by other departments that include actions to reduce carbon emissions such as the OSE Climate Action Plan, OSE Sustainable Building Policy, OSE Urban Forest Management Plan, SCL Integrated Resources Plan, SPU Water System Plan, SPU Shape our Water Long Range Plan, SPU Solid Waste Plan, SPR Park and Open Space Plan, and the Capital Improvement Program. According to the Final Environmental Impact Statement (FEIS), the preferred alternative which, along with Alternative 5, reflects the highest level of growth among the alternatives studied is likely to increase total carbon emissions but the pattern of development in the preferred alternative results in lower per capita carbon emissions.

ii. Resiliency: Will the action(s) proposed by this legislation increase or decrease Seattle's resiliency (or ability to adapt) to climate change in a material way? If so, explain. If it is likely to decrease resiliency in a material way, describe what will or could be done to mitigate the effects.

The Plan includes a new Climate Resilience subelement that includes goals and policies to increase Seattle's resiliency to the impacts of climate change. This subelement reflects the framework of state legislation, HB 1181, passed in 2023. This subelement includes goals and policies for overall resilience planning and identifies specific strategies that will be pursued by the City related to specific impacts: extreme heat, wildfire smoke, sea-level rise, flooding, more frequent intense storms and longer dry periods. These goals and policies will be implemented though more specific action plans created or updated by other departments such as OSE Climate Action Plan, OSE Urban Forest Management Plan, SCL Integrated Resources Plan, SPU Water System Plan, SPU Shape our Water Long Range Plan, SPR Park and Open Space Plan, and the Capital Improvement Program.

The updated growth strategy included in the One Seattle Plan and adopted through this legislation was studied as the preferred alternative in the FEIS. That analysis identifies potential impacts related to climate and resiliency which can be addressed through mitigation. It identifies ways in which the strategy will enhance resiliency. For example, redevelopment would trigger the installation of newer stormwater infrastructure that can be designed to be more resilient to changes in rainfall due to climate change.

The FEIS identifies potential mitigation actions to address climate vulnerabilities and increase Seattle's resiliency. Substantial mitigation will be achieved through implementation of the strategies identified in the Climate Resilience subelement. Additional mitigation can be advanced through an update to the 2012 Climate Action Plan and updates to shorelines and environmentally critical areas regulations to reflect increased risks of sea-level rise, flooding, landslides, and other climate impacts. Potential mitigation measures include the following actions:

- Update landscaping, open space, and tree canopy requirements for new development
- Encourage attached units that result in more permeable areas for plantings
- Maintain and enhance programs to increase tree canopy, including in parks, rights-of-way, and other public lands
- Retrofit stormwater facilities to increase storage capacity and improve water quality treatment
- Update stormwater detention standards for new development
- Update requirements and programs to reduce impervious surfaces
- Support and encourage low-impact development practices
- Installation of solar (photovoltaic) and other local generating technologies
- Implementation of sustainable requirements including the construction and operation of LEED-compliant (or similar ranking system) buildings

- The use of passive systems and modern power saving units
- Implementation of conservation efforts and renewable energy sources to conserve electricity in new developments
- Investment in improved drainage and electrical utilities

e. If this legislation includes a new initiative or a major programmatic expansion: What are the specific long-term and measurable goal(s) of the program? How will this legislation help achieve the program's desired goal(s)? What mechanisms will be used to measure progress towards meeting those goals?

This legislation does not include a new initiative or major programmatic expansion.

5. CHECKLIST

☒ **Is a public hearing required?**

A public hearing will be held on this legislation.

☒ **Is publication of notice with *The Daily Journal of Commerce* and/or *The Seattle Times* required?**

☐ **If this legislation changes spending and/or revenues for a fund, have you reviewed the relevant fund policies and determined that this legislation complies?**

☐ **Does this legislation create a non-utility CIP project that involves a shared financial commitment with a non-City partner agency or organization?**

6. ATTACHMENTS

Summary Exhibits:
Summary Exhibit 1 – Racial Equity Analysis
Summary Exhibit 2 – One Seattle Comprehensive Plan Update Final Environmental Impact Statement
Summary Exhibit 3 – One Seattle Comprehensive Plan Update Final Environmental Impact Statement Appendices

PolicyLink

Advancing Racial Equity as part of the 2024 Update to the Seattle 2035 Comprehensive Plan and Urban Village Strategy

Prepared for the City of Seattle by PolicyLink[1] - April 2021

INTRODUCTION

The Seattle 2035 Comprehensive Plan update represents a transformative opportunity to guide future growth in the city in a way that substantially advances a vision where all Seattleites, regardless of their race/ethnicity, nativity, gender, or zip code, are able to participate and reach their full potential. Revisiting the comprehensive plan is particularly timely as Seattle and the rest of the country look ahead to the recovery from COVID-19. While the City has had a longstanding commitment to racial and social equity since 1994 and has made progress on many of the equitable development goals outlined in Seattle 2035, the pandemic and its impacts highlight persistent racial inequities in health, housing, and economic security. Tensions resulting from these longstanding racialized inequities came to the fore during the summer of 2020 as Black, Indigenous, and other people of color (BIPOC) in Seattle, and cities across the country, organized in protest after the murder of George Floyd. For many of these protesters, misconduct of the police towards residents of color is one facet of the systemic racism that continues to exclude and oppress communities of color. Addressing these inequities is a daunting task that is going to require the collective effort of all Seattleites.

Amidst a historic focus on racial equity in the economic recovery, and anticipating significant new federal funding for infrastructure, the Seattle 2035 update must provide the blueprint to steer investment and development in a way that makes meaningful progress toward racial equity and inclusion. The update also provides an important opportunity to acknowledge and redress past harms, including the negative impacts of prior planning and development decisions.

In advance of the update of the Seattle 2035 Comprehensive Plan, the Seattle Office of Planning and Community Development, in partnership with the Department of Neighborhoods and the Office of Civil Rights, engaged PolicyLink to:

[1] PolicyLink is a national research and action institute dedicated to advancing racial and economic equity with a focus on delivering results at scale for the 100 million people in the United States living in or near poverty. PolicyLink takes an “inside-outside” approach to policy change, working with grassroots advocates focused on economic and racial justice, as well as with policymaker and government champions, to achieve equitable policies.

- Conduct a racial equity analysis of the comprehensive plan;
- Review a compendium of reports highlighting quantitative data on recent patterns of growth and equitable development outcomes;
- Analyze findings from five focus groups of residents discussing challenges and opportunities facing people of color as a result of the City's urban village growth management strategy;
- Engage with community stakeholders and leadership from multiple City departments in a Workshop on Racial Equity in the Seattle Comprehensive Plan and Urban Village Growth Strategy (held on October 29, 2020);
- Identify promising practices other jurisdictions are implementing to achieve more racially equitable outcomes; and
- Make recommendations to the City as it prepares to launch the plan update in 2021.

The following report includes four sections:

1. *Equity in Seattle's Comprehensive Planning Efforts* grounds the comprehensive plan update in the City's 25+-year history of equitable planning efforts.
2. *Centering Race and Acknowledging Past Harms* elevates the importance of acknowledging commitment to redress past harms and outlines the historical planning and land use decisions that created the current landscape of housing opportunity.
3. *Inequitable Outcomes for BIPOC Communities* summarizes key observations and data on racial equity outcomes since the 2016 adoption of Seattle 2035.
4. *Recommendations for a More Equitable Comprehensive Plan Update* presents our recommendations on how the comprehensive plan update can best address inequities and build a more equitable future, including ensuring meaningful community engagement in the update.

I. EQUITY IN SEATTLE'S COMPREHENSIVE PLANNING EFFORTS

The Seattle 2035 update will build upon decades of groundwork. Seattle's first comprehensive plan, released in 1994, launched the urban village strategy. By focusing growth in urban villages and centers, the city seeks to promote walkable access to neighborhood services, more efficiently serve residents with public transit, strengthen local business districts, and support climate resiliency by reducing greenhouse gas emissions. The plan has been effective how and where the city has grown: Since 1995, the share of the city's housing growth going to urban villages has steadily increased, while the share of development outside of centers and villages has declined.[i]

Seattle created the Race and Social Justice Initiative within the Office for Civil Rights (OCR) in 2004 with a focus on eliminating institutional racism within city government. The City's Race and Social Justice Initiative (RSJI) envisioned that all policies and practices yield a future where:

- Race does not predict how much a person earns or their chance of being homeless or going to prison;
- Every schoolchild, regardless of language and cultural differences, receives a quality education and feels safe and included; and
- African Americans, Latinos, and Native Americans can expect to live as long as white people.

Seattle 2035 codified the City's commitment to racial and social equity as core values, which are reflected in the plan's policies and growth strategy. To shape development of the plan, the city council passed Resolution 31577 directing City staff to make the racial equity more visible in the plan introduction, core values, goals and policies; and to incorporate a growth strategy equity analysis and equity metrics. The city incorporated a racial equity analysis of the draft Comprehensive Plan and developed a Displacement Risk Tool and Access to Opportunity Tool to better understand the landscape of threats and assets facing low-income and BIPOC residents in different neighborhoods across the city. A framework for implementing the goals of the plan and advancing racial equity and inclusion was formalized with the creation of the Equitable Development Initiative (EDI) in 2016. EDI supports neighborhood leaders and community-based organizations, including grants and other assistance, in advancing equitable access to housing, jobs, education, parks, healthy food, and other amenities and in mitigating displacement.

II. CENTERING RACE AND ACKNOWLEDGING PAST HARMS

For Seattle to achieve the desired impact of advancing racial equity, the City must first address the lingering impacts of past injustices. The urban village strategy has not been able to mitigate the displacement of BIPOC residents because it perpetuates a land use and zoning policy that was specifically designed to limit their housing options. To move beyond tinkering at the margins of equitable neighborhood change, city leaders should embrace a reparative framework that specifically addresses the root causes of housing insecurity for BIPOC Seattleites. This entails an intentional focus on updating the Comprehensive Plan in conjunction with equitable policies that center the voices and agency of the most marginalized.

Many of the economic and housing inequities we see today can be traced to past public sector policies and programs and private sector practices. The Seattle Planning Commission and others have documented the impact that policies such as the G.I. Bill, Federal Housing Administration lending practices, and racially restrictive covenants have had on Seattle's neighborhoods to this day, which are summarized below.

Starting early in the 20th Century, racist developers and city planners in cities across the country began to institute racial zoning ordinances forbidding people of color from living in or buying homes in white neighborhoods. This trend accelerated with the Great Migration of African Americans from the south to industrial cities in the northeast and midwest. Baltimore enacted the first racial zoning ordinance in 1910, and within several years the practice was widespread

in the region. Racial zoning was outlawed in 1917 when the U.S. Supreme Court declared that a Louisville, Kentucky racial zoning ordinance was unconstitutional in *Buchanan vs. Warley*.

Following the ban on racial zoning, developers began using racially restrictive covenants to prohibit homeowners in a designated neighborhood from selling their home to people of color. These neighborhoods became and remained almost exclusively white, shutting people of color out from the economic opportunity to build wealth as property values increased. Restrictive covenants were struck down by the Supreme Court in 1948 in *Shelly vs. Kraemer,* and eventually outlawed by the Fair Housing Act of 1968.

With the passage of the Fair Housing Act of 1968, developers and city leaders found alternative ways to leverage land use regulations to benefit from racial segregation. Local governments expanded the use of exclusionary residential zoning to keep out low-income people of color since single-family zoning mandates a minimum parcel size for single-family homes that are typically unaffordable to low-income people of color. At the same time, communities of color were zoned as commercial, industrial, or mixed-use, fueling the concentration of environmental hazards in these neighborhoods.

This push for local governments to establish single-family zoning regulations was largely driven by real estate developers and was in part an effort to institutionalize the same discrimination previously codified in restrictive covenants. Real estate developers, often seeking to develop large tracts of dozens or hundreds of homes, feared that the allowing people of color to move into the neighborhood would lower the sale prices of the homes.[ii] Many developers were not in favor of policies that facilitated residential mobility for African Americans because it prompted wider readjustments of property values in White neighborhoods. Developers sought to minimize these readjustments and maximize profits and the Federal government was complicit by refusing to insure projects that lacked racial deed restrictions. Research from the University of Washington confirms that restrictive covenants have left a lasting impression on the availability of housing opportunities for low-income people of color in Seattle.[iii] For example, due to restrictive covenants, households of color were unable to gain access to mortgage financing and, as a result, the wealth building opportunity of homeownership. This effectively limited their financial ability to move into a more desirable neighborhood even after the racially exclusionary zoning and restrictive covenants were eliminated.[iv]

Redlining has also been proven to have had long-term deleterious consequences for Black Seattleites. The term redlining can be traced back to the color-coded maps used by the Home Owners Loan Corporation (HOLC) to guide Federal Homeowners Association (FHA) lending practices. The dramatic increase in homeownership and concomitant expansion of the American middle class in the mid-20th would not have happened without the FHA and the advent of their 30-year mortgage product.[v] However, the FHA and HOLC defined Black residents as an “undesirable population” and refused to issue loans to residents in these neighborhoods. To be clear, federal policy created a pathway to homeownership, the middle class, and intergenerational wealth for White households that was unavailable to Black households.

The cumulative impacts of restrictive covenants, racist lending practices, and exclusionary zoning have become entrenched and continue to impact many Seattle households of color. Research has confirmed that many of the same Seattle neighborhoods where BIPOC residents currently face the largest threat of displacement were once deemed "undesirable" by HOLC over 80 years ago.[vi] These neighborhoods were once comprised by BIPOC residents due to the segregation perpetuated by redlining that limited the availability of housing options elsewhere in the city. These limited housing options also contributed to the racial wealth gap in the city by creating a disproportionate share of BIPOC residents that are renters rather than homeowners. Zoning and land use decisions continue to uphold segregation and perpetuate a racialized threat of displacement. With 75 percent of residential land excluded from accommodating more affordable housing types, low-income BIPOC residents are left confined to certain sections of the city competing for limited affordable housing opportunities. Accordingly, despite the advent of the Race and Social Justice Initiative, and the good intentions behind the urban village strategy, the approach has not achieved its goals because it ultimately perpetuates the same housing insecurity of low-income BIPOC residents that has been in place for years.

It is important to acknowledge the historical succession of racialized policies and practices which not only reflect the institutional racism in this country rampant at that time, but also help to perpetuate racial and economic segregation to this day. As low-income residents and people of color continue to struggle to access neighborhoods of opportunity or enjoy stability in their cultural communities, their ability to achieve intergenerational economic mobility is stunted. Homeownership and education provide two examples. Research has confirmed that children of homeowner parents are more likely to own a home and thereby have a vehicle to accrue wealth.[vii] Those households with access to homeownership in prior years are able to financially benefit from increasing property values in the city. At the same time, while the cost of ownership housing in Seattle has made homeownership out of reach for many low-income people and people of color, rising rents have exacerbated housing insecurity for renters. Education has long been considered "the great equalizer" because of its potential to advance intergenerational economic mobility.[viii] However, recent research has confirmed that the ability to access a high-quality education varies across Seattle, with students in wealthier districts benefitting from additional teachers and other resources unavailable to low-income students in other districts.[ix] Many of the high-performing schools are in the single-family neighborhoods that BIPOC families were unable to access in the past due to redlining and restrictive covenants. Low-income BIPOC households continue to struggle accessing these neighborhoods due to the lack of affordable housing options available. A national analysis of "greenlined" neighborhoods (e.g. deemed "Best" or "desirable in HOLC maps) found that they remain more than 70 percent White.[x] As a result, the same low-income families of color harmed by redlining and restrictive covenants in the past continue to suffer from housing insecurity and remain locked out of wealth-building opportunities that could lead to greater economic mobility for future generations.

III. INEQUITABLE OUTCOMES FOR BIPOC COMMUNITIES

While the City has taken several laudable steps toward fostering equitable community development, an analysis of racially disaggregated data, five focus groups with residents, and a focused discussion with over 80 city leaders indicate that there are some areas of the comprehensive plan where efforts are underperforming. Key challenges include the following:

There are insufficient housing options available that are affordable to low-income families. A primary goal of the urban village strategy is to confine growth to areas of the city that are well served by transit, and dense enough to absorb new development. This approach has worked to focus new development without inhibiting growth: the City is already well ahead of the growth projections in Seattle 2035. Despite this surge in production, housing prices and rents have continued to rise, especially for larger units. The lack of affordable units is particularly harmful for Black residents in the city given the disproportionate share of Black households that are low-income and housing cost burdened.

Residents of color disproportionately face housing insecurity and risk of displacement. Seattle's overall population has grown in recent years, but the share of the population that is people of color has not kept pace. Between 1990 and 2010, the population of color in the larger metro area increased much more dramatically than it did in the city of Seattle. In addition, Seattle's Assessment of Fair Housing also indicates that between 2000 and 2010, the number of children of color in Seattle increased by only 2% compared with 64% in the balance of King County. There are a number of possible reasons for these demographic shifts. However, the difficulty households of color in Seattle face in finding quality, affordable housing is likely a contributing factor. Twenty-two percent of households of color in Seattle are paying more than half of their income towards housing costs. Focus group participants intimated fear of residential, commercial, and cultural displacement as growing numbers of their neighbors and local small businesses become priced out of gentrifying neighborhoods.

The share of BIPOC Seattleites that are homeowners is declining. The high cost of housing in Seattle is negatively impacting the ability for low-income people and people of color to become homeowners and build wealth. Focus group participants lamented the decline in homeownership among BIPOC Seattleites. The share of Black Seattleites that are homeowners is at the lowest point in 50 years.[xi] The National Equity Atlas reveals that the Black homeownership rate shrunk from 37 percent to 24 percent between 1990 and 2017.[xii] The City's Housing Choices Background Report confirms that "owning a home in Seattle is no longer affordable to the vast majority of people who live and work here."[xiii] This makes it disproportionately difficult for low-income BIPOC households to access homeownership and achieve intergenerational economic mobility.

People of color are struggling to access opportunities afforded to residents of single-family neighborhoods. The City's Equitable Development Implementation Plan states that "Seattle's

communities of color tend to live in neighborhoods with low access to opportunity, leaving many without access to resources necessary to succeed in life."[xiv] This assessment is based the Access to Opportunity index which measures key determinants of social, economic, and physical well-being such as quality of education, civic infrastructure, transit, economic opportunity, and public health. In addition to the Access to Opportunity index findings, the Assessment of Fair Housing indicates that the racially or ethnically concentrated areas of poverty (R/ECAPs) in the city include disproportionate rates of people of color, foreign born people, families with children, and people with disabilities. Finally, focus group participants underscored the need to desegregate neighborhoods with high-achieving schools.

There is an insufficient number of units affordable and available to large families. Only two percent of rental units in Seattle have three or more bedrooms.[xv] Seattle's Assessment of Fair Housing confirms that "the disproportionately high rate of housing problems experienced by large families indicates significant unmet housing needs among these households." For example, limited housing options leaves larger families with greater likelihood of living in areas with higher poverty exposure.[xvi] The need for larger units is acute for immigrant families and other households of color, who are often supporting, housing, or cohabitating with an extended family network.

People of color have longer commute times than their White counterparts. A core element of the urban village growth strategy is that development is directed toward light rail and other public transit options. In many regards the City has been successful in providing more frequent service. The share of housing units in the city with access to transit running every 10 minutes or more frequently increased by 13 percentage points between 2016 and 2017. Based on the reporting from the Equitable Development Monitoring Program and feedback from focus group participants, residents of color in Seattle have longer commute times than their White counterparts. In addition, the neighborhoods with the highest number of jobs accessible via public transit have very few market-rate units affordable to low-income families.

There is a need for more accessible workforce training and apprenticeships. – The Seattle 2035 Comprehensive Plan projects that Seattle will grow by 115,000 jobs by 2035.[xvii] As documented in the Urban Village Monitoring report, growth since 2015 has exceeded projections, with one-fifth of the anticipated job growth for the entire 20-year period achieved in one year. Low-income and BIPOC residents have been unable to take advantage of much of this job growth.[xviii] Lack of available jobs and barriers obtaining existing jobs were recurring themes in focus group discussions. This aligns with research indicating the unemployment rates for Black and Native American workers is more than twice that of their white counterparts.[xix] Similarly, BIPOC residents explicitly expressed the need for more middle-wage job opportunities, apprenticeships, and pathways to positions in technology and other growing sectors during focus groups and other community meetings held to inform the comprehensive plan update.

RECOMMENDATIONS FOR A MORE EQUITABLE COMPREHENSIVE PLAN UPDATE

There are a number of ways that Seattle City leaders could use the Comprehensive Plan update process to advance racial equity goals. The section below highlights several priority areas to address in the update process, incorporate in the updated Comprehensive Plan, and/or address through implementation actions, and the evaluation of the plan.

To implement a more equitable growth strategy, city leaders should adhere to the following principles for an equitable Comprehensive Plan:

1. **Think beyond the limits of the plan to create longer-term institutional infrastructure for equity.** Seattle 2035 is not a panacea that will solve every challenge facing BIPOC residents. However, it does represent an opportunity for the city to proactively coordinate across departments and partner with residents and community-based organizations to develop a suite of policies and programs that will guide the growth resulting from the plan. Such structures could become expanded institutional infrastructure and capacity to advance equity. This aligns with a recommendation PolicyLink staff made in 2015 to "set a cross-department table for addressing implementation".
2. **Identify and support a pipeline of resident leaders for co-creation throughout the life of the plan.** The extensive community engagement that informed the last Comprehensive Plan update is well documented. The Community Liaisons program is an encouraging example of this principle in practice. Implementing an equitable growth strategy will require frequent and open dialogue with residents, particularly those from underrepresented groups such as immigrants, youth, and those with limited English proficiency. Training, technical assistance, and/or supplemental education may be necessary to ensure that residents are prepared for fully informed decision making.
3. **Maintain a focus on population level outcomes.** Improved conditions for low-income and BIPOC residents will not be achieved with a cookie cutter approach. The needs and barriers to success vary across groups. Strategies for leveraging future development to achieve equitable goals should focus on achieving results at scale.
4. **Use disaggregated data to develop tailored equity approaches that reach marginalized groups and measure success.** Access to racially disaggregated data at a range of levels is critical (e.g. household, neighborhood, and citywide).

Racially inclusive approach to reform of single-family zoning

A major equity challenge for the urban village strategy is that it is used as a rationale for continuation of exclusionary planning practices that have shaped Seattle. Specifically, while the City has recently taken steps to allow more forms of accessory dwelling units (ADUs), the urban

village approach continues to reinforce the exclusion, generally, of everything except single-family residential construction on 75 percent of the residentially zoned land in the city. Given its racist origins, single-family zoning makes it impossible to achieve equitable outcomes within a system specifically designed to exclude low-income people and people of color. In order to advance racial equity at the scale codified in Resolution 31577, the City must end the prevalence of single-family zoning. This will not only create much-needed additional housing opportunities in high opportunity neighborhoods for low-income residents, is also a reparative approach with the potential to create intergenerational economic mobility for BIPOC Seattleites. Eliminating single-family zoning will not automatically or immediately incentivize the development of affordable housing. To encourage property owners to develop additional units on upzoned land, incorporating a split rate tax policy could be useful. A land value tax charges a higher rate on land and a lower rate on structures, making it in the property owners' best interest to spread that cost across units. This approach has been found to incentivize owners of expensive land with low-density structures.[xx] Similarly, factory-build accessory dwelling units have been found to reduced labor and material costs and shorter construction timelines that make their use more affordable.[xxi]

Achieving the goals of the RSJI will require a fundamental shift in how the City approaches land use and zoning. When 75% of residential land is reserved for single-family housing, the remaining 25% of land will continue to foster demand at prices unaffordable to low-income families. As the City launches the next Comprehensive Plan update, leaders should adopt a land use vision and regulations that center housing security and affordability for current and future BIPOC communities, with access and choice in neighborhoods of opportunity and bridges to homeownership and wealth building. This requires identifying and addressing the barriers preventing low-income BIPOC residents from achieving these goals.

A recurring theme across focus groups and the 10/29 workshop was the need to increase access to opportunity and economic mobility for BIPOC residents. The City should explore the best combination of financial and regulatory incentives, penalties, and technical assistance necessary to generate additional housing opportunities for low- and moderate-income households in neighborhoods currently zoned for single family residences. As the comprehensive plan strategically guides more growth in these neighborhoods, the City can develop policies and programs to ensure that any new development advances racial equity goals. The Comprehensive Plan should include a policy framework for such development, embedded in a growth strategy that recognizes key neighborhood differences. The strategy could be developed to have disparate impact in certain neighborhoods based on market viability or to promote integration and anti-displacement. Implementation of the strategy through zoning code, for example, could leverage development with incentives, such as:

- Minimum/maximum lot size allowed for conversion or new construction
- Permissibility of interior, attached, or detached development
- Gross floor area allowed

- Number of units allowed per lot
- Parking requirements
- Owner occupancy requirements
- As of right vs permitted
- Public hearing
- Amnesty of existing illegal ADUs
- Inspection fees

These leverage points could be used to incentivize participation in City programs that advance racial equity using a range of existing subsidies such as CDBG funds, HUD Section 3, or SBA 7A funds. This approach, which can be applied in the context of a range of infill housing types including but not limited to ADUs, has already been implemented in several smaller cities such as the following:

- Affordable housing - The town of Barnstable, MA instituted an amnesty program and limited eligibility to owner-occupants. The property owner must agree to rent to low-income tenants for a minimum of one-year term lease. The City incentivized participation by waiving inspection fees, using CDBG funds to reimburse homeowners for eligible costs associated with the rehabilitation of any unit rented to a low-income family, and tax relief to offset the negative impact of deed restrictions that preserve the affordability of the unit.
- Apprenticeships – The City of Santa Cruz updated their comprehensive plan to allow ADU construction and eliminate parking requirements. They concomitantly promote a wage subsidy program for licensed contractors that hire apprentice workers to help build ADUs.

Increase the supply of affordable housing, particularly units that are community-controlled with long-term affordability provisions.

The affordable housing shortage in Seattle has reached a crisis level. The private market is ill-equipped to generate housing opportunities affordable to low-income households. The most common subsidies used to support affordable housing development typically expire within 30 years, creating a new crisis as advocates scramble to find resources to preserve these units. The City can take steps to increase the supply of long-term affordable units while also supporting the agency and community voice of BIPOC leaders. As one example:

- Expand and replicate support for community land trusts such as Africatown - Community land trusts promote lasting affordability and community control of land. They differ from traditional housing non-profits in that they separate the ownership of land from the ownership of housing and are governed directly by community members. The City should prioritize community land trusts as part of the disposition strategy for publicly owned/surplus land. This may require allocation of additional resources for capacity building, technical assistance, and/or robust community engagement. City

leaders should consider developing a fund to support the acquisition of units with expiring affordability requirements that could be used for community land trusts or other cooperative homeownership models, along with affordable homeownership opportunities in neighborhoods currently zoned for single-family homes.

- Explore opportunities to advance equitable transit-oriented development (eTOD) – Transit-oriented development (TOD) is a planning and design approach that encourages compact, mixed-use, pedestrian-oriented neighborhoods around new or existing public transit stations. The high demand for TOD housing adjacent to transit can make homes inaccessible to people with lower incomes, while the rapid increase in property values spurred by new transit investments can lead to gentrification and the displacement of low-income BIPOC residents. Equitable transit-oriented development refers to TOD efforts undertaken with an explicit commitment to achieve equity goals through dedicated strategies that ensure low-income residents and residents of color benefit from – and are not displaced by – the new development. For example, eTOD entails a commitment to affordable housing, and that all transit modes are prioritized such that bus-service to transit-dependent communities isn't cut in order to support a new light rail service.[xxii] In addition, the City should require local/targeted hiring of residents and support "last mile" infrastructure that allows for efficient and effective connections between transit and home for resident. The Comprehensive Plan should replace the current definition of "transit-oriented communities" in the glossary, and the two references in the Land Use section, with language that describes eTOD to establish a benchmark for developers to follow.

Acknowledge and redress past harm

There are several ways that Seattle could advance a reparative framework as part of the Comprehensive Plan update:

- Identify and protect places of significant cultural importance – While fear of residential displacement was a core challenge expressed by focus group participants as well as those at the 10/29 workshop, the erasure of the long-time cultural identity of certain neighborhoods was also elevated as an issue that needs to be addressed. As noted in the workshop, the goal should be "not just avoid displacement, but also make Seattle a place where BIPOC folks want to live, can afford to live, feel welcome and comfortable." Preserving cultural institutions such as the East African Community Center will help to accomplish this. Other cities have successfully employed this strategy. For example, Austin, TX has launched a Cultural Asset Mapping Project through a partnership between their Cultural Arts Division and Economic Development Department to document the places and resources that are important to the creativity and cultural identity of the city.[xxiii] The resource was developed through extensive community engagement in each city council district. Seattle could develop a similar list of sites that

could be included as an Appendix to the Arts and Culture element of the Comprehensive Plan, helping to inform decision-making around the future those sites.

- Revisit community preference policy – City data confirms that the urban village strategy is guiding development in a way that exacerbates housing insecurity for low-income BIPOC residents. The limited availability of developable land raises housing costs to a price point unaffordable for many of these households. Seattle has instituted a community preference policy, but the legislation is currently voluntary, only available to development in areas facing displacement, and solely intended for nonprofit affordable housing providers. City leaders should ensure the plan broadly supports community preference tools and the City should explore the viability of expanding the policy to support low-income BIPOC residents that are housing insecure but may want to live in lower-density neighborhoods.
- Institute a zoning overlay that promotes homeownership among BIPOC residents in formerly "greenlined" single-family neighborhoods. The lingering impacts of redlining in Seattle are well documented. The update of Seattle 2035 offers an opportunity to help redress some of these harms. As city leaders revisit the proliferation of single-family zoning in the city, steps should be taken to better integrate the neighborhoods that have been out of reach for BIPOC homeowners. This could be accomplished with passage of a Community Opportunity to Purchase (COPA) policy similar to the one recently passed in San Francisco. This policy requires that homeowners within the overlay area notify a pre-defined list of community-based organizations when they plan to sell the property. While COPA is typically used for multifamily buildings, the approach could be useful in providing community-based organizations with a level playing field in purchasing homes in hot market neighborhoods. With an upzoning, this process could result in multiple housing opportunities on the same lot. Community development corporations may need additional resources and training to implement a targeted acquisition strategy. The Cleveland Housing Network (CHN) has been able to develop almost 2,200 homeownership units with Low-Income Housing Tax Credits using a 15-year lease-to-own model.[xxiv] To support CDCs in acquiring additional resources and technical assistance, the City could develop a local CDC-tax credit program similar to the one used in Philadelphia, PA. Instead of paying the local Business Income and Receipts tax, qualifying businesses are able to make a contribution to a CDC and receive credit against taxes due to the city revenue department.

  Develop an approach for providing reparations to BIPOC Seattleites – Jurisdictions across the country are beginning to acknowledge the root cause of many racialized disparities facing BIPOC can be traced back to the negative economic impacts of government policies and programs. Several of these jurisdictions have committed to determining the optimal amount and approach for issuing compensation for these injustices. For example, in July 2020, the Mayor of Providence, RI began a multi-step process towards determine what form of reparations the city will take.[xxv] Similarly, the

City Council of Asheville, NC unanimously passed a resolution acknowledging systemic racism and committing to " a process to develop short-, medium-, and long-term recommendations to specifically address the creation of generational wealth and boost economic mobility and opportunity in the Black community."[xxvi]

- Redirect tax revenue to a reparations fund for BIPOC residents – The deleterious impacts of land use and zoning decisions goes beyond housing. One of the negative outcomes of the racially driven segregation of Seattle neighborhoods, is that low-income communities of color continue to face excessive contact with the police. Since the 1980s, the War on Drugs has been disproportionately waged in low-income BIPOC communities, despite no empirical evidence that people of color use drugs more than any other group. As a result, there has been disproportionate incarceration of BIPOC residents, with intergenerational impacts on households in these neighborhoods. Evanston, IL opted to leverage the legalized cannabis industry in Illinois in order to create a fund that will begin to address some of these disparities.[xxvii] Similarly, Oakland, CA has created an equitable licensing program that prioritizes individuals that were previously incarcerated for nonviolent drug offenses.[xxviii] Reparations for Seattle's BIPOC communities could also take the form of preserving or rehabilitating culturally significant sites.

Foster an equitable workforce ecosystem

City leaders should consider better coordinating workforce training with the economic development priorities for future growth. For example, if the City anticipates further growth of tech employment under the current comprehensive plan, then the Racial Equity Committee of the Workforce Development Council of Seattle-King County is well-positioned to ensure that federal Workforce Innovation and Opportunity Act (WIOA) funds are used to develop "earn and learn" training opportunities which have been found to be particularly impactful for BIPOC workers.[xxix] The Comprehensive Plan can and should support such efforts.

The Urban Village Monitoring Report has two key indicators regarding employment: employment growth in the city as a whole by sector; and distribution and rates of employment growth by Urban Center and Hub Urban Village. While these indicators help to illustrate the supply of jobs in the city, they do not convey the rate that low-income people and people of color are able to obtain these jobs, or whether the jobs pay a family-sustaining wage. A more complete understanding of the equity outcomes related to economic growth would benefit from such data. This should also include the number of living wage jobs created as a result of City investments, such as the number of jobs created going to local residents, low-income residents, or residents of color as a result of public investments such as the Housing Levy or Multifamily Tax Exemption. While tracking such data would require developing new systems of engagement and accountability for developers, there is precedent. For example, the City already has access to contractor payroll information to ensure compliance with prevailing wage,

Davis Bacon, and HUD Section 3 projects. The current payroll tracking system could be adapted or mined for relevant data to better track the workers on projects also receiving city subsidy.

Increase resident power and voice in the development and investment process

A core element of any racial equity effort, especially with a strong focus on anti-displacement and community underinvestment, is to amplify the voice and leadership of BIPOC residents. There are several ways that City leaders can proactively address these threats, which are described below, with examples from other cities. The Comprehensive Plan update should, where appropriate, include policies that support adoption of tools like these.

- Tenant Opportunity to Purchase (TOPA) policies provide tenants living in multi-family buildings with advance notice that the landlord is planning to sell their building and an opportunity for them to collectively purchase the building. These policies generally require landlords to provide an intent to sell notice to their tenants, along with a timeframe for the tenants to form a tenant association and express interest in purchasing the units, and an additional timeframe for the tenants to secure financing. By providing renters with the right to negotiate and collectively bargain to purchase their buildings, TOPA policies level the playing field in highly speculative markets such as Seattle. TOPA was first enacted in Washington, DC in 1980 and is the nation's oldest and most comprehensive policy.[xxx] From 2002 to 2013, DC's TOPA helped preserve close to 1,400 affordable housing units and keep thousands of long-time, low-income residents in their homes.[xxxi] Tenants can purchase units individually, turning units into condos, or collectively if they form a tenant association and in partnership with a developer. Additionally, the District can acquire housing through the District Opportunity to Purchase Act (DOPA) to preserve affordable housing and address at-risk housing in need of serious repairs.
- San Francisco opted to develop a Community Opportunity to Purchase Act (COPA) which gives nonprofits a first right of purchase, allowing landlords to sell at market rate to nonprofits. Due to San Francisco's inflated property costs, many tenants are unable to secure enough funding to purchase a property on their own through a TOPA policy. Nonprofits could purchase housing but struggle to compete with private purchasers ready to pay in cash. COPA addresses these challenges by requiring landlords to notify affordable housing nonprofits from a qualified list when their building goes up for sale. The policy also includes a financial incentive to property owners to sell to nonprofits by exempting sites valued at $5 million or more from paying a portion of the local property transfer tax. San Francisco fortified their COPA policy by instituting the Small Sites

Program which provides loans to nonprofit organizations, to buy buildings before an investor does. The buildings are then converted to permanently affordable housing.

- In addition to the above strategies designed to protect residents of existing units, robust community benefits agreements (CBA) should be employed by the City for large commercial and multifamily market rate developments to generate resources for affordable housing and opportunities for economic inclusion. Similar City programs such as Mandatory Housing Affordability and incentive zoning efforts, which contribute to the affordable housing stock, do not advance inclusive economic development through employment, apprenticeships, or support for BIPOC-owned businesses in the way that CBAs have historically been used. CBAs are typically driven by coalitions of residents and advocates. However, municipalities can help foster an hospitable environment in which these coalitions can operate. For example, in 2004 the Board of Aldermen in New Haven, CT passed a resolution strongly encouraging developers to enter into CBAs and emphasizing that the city would consider CBA efforts when considering projects for approval.[xxxii] in 2016, Facebook entered into a CBA with a community coalition in East Palo Alto, CA, regarding a major office expansion. The CBA requires Facebook to provide nearly $20 million toward a fund to be used for affordable housing in the region. This fund was soon leveraged to include approximately $60 million of additional funds, to be expended on the same terms. The CBA also provides funding for other issues of community concern, including legal support for tenants and policy advocacy campaigns. Similarly, in 2018, Nashville-based community coalition Stand Up Nashville negotiated a CBA to accompany a proposed soccer stadium. The CBA contained requirements for living wage jobs, first-source hiring, affordable housing, a child-care center, and other community benefits.
- Participatory budgeting is an approach to governing that allows residents to decide how public tax dollars will be used. The process is particularly inclusive as participation can include groups that might not otherwise be able to contribute such as renters, youth, returning citizens, and undocumented workers. Engagement of these groups is key as research confirms that white, male homeowners are the most likely to share comments at zoning and planning meetings.[xxxiii] The City of Chicago utilizes participatory budgeting to allow residents from the West Humboldt Park neighborhood to steward the funds collected through a tax increment finance (TIF). In 2018, this amounted to $2 million exclusively directed by neighborhood residents.

CONTINUE TO INVEST IN BIPOC RESIDENT LEADERS TO CO-CREATE A MORE EQUITABLE PLAN

The Seattle 2035 Comprehensive Plan already codifies the importance of robust community engagement. The Community Well-Being and Community Involvement elements reflect a commitment to supporting all Seattleites, especially marginalized communities that are most impacted by City policies, as the city grows. Following the 2015 Comprehensive Plan update, the City documented their outreach strategies and accomplishments in *Community*

Engagement Final Report. The report highlights extensive engagement efforts in neighborhoods and citywide over a two-year period. More than 1,000 residents participated online, roughly 2,600 people met in-person, and more than 2,100 shared their feedback on the plan via a written survey.[xxxiv] The targeted approach delineating audiences that are already active from traditionally under-represented groups, millennials, and parents of young school aged children facilitated the strategic use of City resources. A similar approach should be employed with the forthcoming plan update. There is value in ensuring that as many Seattleites as possible are aware of the update and understand how they can participate.

To achieve the equity goals enumerated earlier, the city will need to rely on an ecosystem of more deeply engaged residents. For example, Seattle has over 70 boards and commissions on which residents can apply to participate. Similarly, the Public Outreach and Engagement Liaisons (POEL), also known as the Community Liaisons program pays residents on a contract basis to organize community meetings, recruit participants, and connect them to resources such as utility payment assistance, transit passes for low-income riders, and affordable kids summer camp.[xxxv] As the City pursues citywide community engagement strategies, they should expand the Community Liaisons program to ensure that there is a pipeline of BIPOC resident leaders of a range of ages, and across neighborhoods that is adequately trained to support ongoing outreach once the updated plan has been adopted. To optimize the investment in capacity building, recruiting youth and young adults should be prioritized.

Conclusion

In conclusion, the City of Seattle and King County continue to be seen as national leaders in embracing the principles and values of equitable development. However, feedback from residents and city leaders, and racially disaggregated data confirm that Seattle still has a long way to go. The 2020 Comprehensive Plan update is an opportunity for the City to fully lean into its racial equity goals and address the remaining gaps facing low-income people and people of color. There is already tremendous work happening across the city to build on for this next phase. The observations shared above offer perspective on ways for City leaders to use the Seattle 2035 update as a vehicle for accomplishing their shared goal of advancing equitable development. With a vigilant focus on uplifting the most vulnerable, vesting residents with sufficient power and community voice, and tracking the right indicators, the City has the potential to achieve its goal of ensuring that all Seattleites are able to thrive and reach their full potential.

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Seattle

One Seattle Comprehensive Plan Update

Final Environmental Impact Statement

January 2025

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Seattle
Office of Planning &
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January 30, 2025

Dear Community Members,

This City is pleased to release the Final Environmental Impact Statement (FEIS) for the One Seattle Comprehensive Plan Update. The proposal evaluated in the FEIS includes:

- Amendments to the Comprehensive Plan goals, policies and the Future Land Use Map (FLUM) that direct where growth will occur over a twenty-year planning horizon (through 2044) to accommodate between 80,000-120,000 new dwelling units and 158,000 new jobs and directs associated investment in city facilities and services to accommodate such growth.
- Zoning changes to implement the amendments to the Comprehensive Plan goals, policies and the FLUM.
- Amendments to development standards or new development standards to implement the Comprehensive Plan changes including amended FAR, lot coverage, structure height, setbacks among other standards to implement HB 1110.

Seattle last engaged in a citywide process to update our Comprehensive Plan nearly a decade ago. This update provides an opportunity to address persistent and emerging challenges: racial equity, housing costs, access to economic opportunity and education, climate change, and more.

The City is required to prepare an EIS to carefully evaluate potential environmental impacts of the actions we are considering. We have evaluated options that could change the amount, location, and type of housing to meet expected future growth and ongoing challenges around housing unaffordability and displacement. These options could also shift the location of jobs, services, and amenities, as well as transportation patterns. This FEIS covers a wide range of topics including impacts to earth and water quality, air quality and emissions, plants and animals, energy and natural resources, noise, land use patterns, historic resources, population, employment, housing, transportation, public services, and utilities. Throughout our analysis, we apply a particular focus on opportunities to address equity and climate change.

In March of 2024, OPCD released a Draft EIS and asked for your review and comments. The Draft EIS studied five alternatives at a programmatic level, illustrating different growth strategies to meet the City's projected growth allocation. Alternative 1 was a No Action

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alternative that is required by the State Environmental Policy Act (SEPA) and is used as a basis for comparison.

The four action alternatives included:

- Alternative 2 (Focused) includes the creation of additional areas of focused growth called neighborhood centers to create more housing around shops and services.
- Alternative 3 (Broad) allows a wider range of low-scale housing options, like duplexes, triplexes, fourplexes and stacked flats, in all Neighborhood Residential (NR) zones.
- Alternative 4 (Corridor) allows a wider range of housing options in areas near transit and amenities.
- Alternative 5 (Combined) includes the strategies for encouraging housing growth in Alternatives 2, 3, and 4 plus changes to existing center boundaries and designations.

Your comments helped refine the analysis of potential impacts of the alternatives studied and shaped a Preferred Alternative that is introduced in the Final EIS. The Final EIS contains a Preferred Alternative that combines elements of the alternatives studied in the DEIS, and studies growth of 120,000 households and 158,000 jobs by the year 2044, like Alternative 5. The FEIS also responds to comments made on the Draft EIS.

The Draft EIS and Final EIS together comprise the entire EIS for this proposal. Additional information about the proposal can be found here: Project Documents - OPCD | seattle.gov

Sincerely,

Rico Quirindongo
Director, Office of Planning and Community Development

FACT SHEET

Project Title

One Seattle Comprehensive Plan Update

Proposed Action & Alternatives

Legislation is proposed to update Seattle's Comprehensive Plan, which is the vision for how Seattle grows and makes investments and implementing development standards. The Comprehensive Plan's goals and policies and future land use map guide where new housing and jobs are directed, and where the City invests in transportation, utilities, parks, and other public assets. The Comprehensive Plan will also address racial inequities, housing costs, access to economic opportunity and education, and climate change. As part of the One Seattle Plan Update, the City will also consider updates to zoning and development regulations to implement the Plan. Final EIS alternatives vary levels, types, and locations of growth and investment.

- **Alternative 1: No Action**—The No Action Alternative is required under the State Environmental Policy Act (SEPA). It would continue implementation of the current Seattle 2035 Comprehensive Plan. The No Action Alternative for the One Seattle Plan maintains the status quo of focusing most housing and jobs within existing urban centers and villages with no change to land use patterns. It also incorporates changes proposed as part of the recent Industrial and Maritime Strategy EIS. It would meet regionally set growth targets including 80,000 new homes and 158,000 jobs for the period 2024-2044.
- **Alternative 2: Focused**—Alternative 2 includes the creation of additional areas of focused growth called neighborhood centers to create more housing around shops and services. Neighborhood centers would be similar to existing urban villages in that they would allow a wide range of housing types and commercial space, but with a smaller geographic size and lower intensity of allowed development. This alternative would result in a greater range of housing options with amenities and services in many neighborhoods. For the period 2024-2044, Alternative 2 includes more housing than Alternative 1 at 100,000 new homes. Eighty thousand homes would be located in a similar distribution to Alternative 1, with the 20,000 additional homes accommodated in neighborhood centers. Like Alternative 1, Alternative 2 includes 158,000 new jobs, but their distribution would vary. Compared to Alternative 1, about 15% of new jobs in Alternative 2 and the other action alternatives are assumed to be

located in proportion to the location of new housing. This assumption accounts for the desire of businesses like local retail, restaurants, and services to locate near housing.

- **Alternative 3: Broad**—Alternative 3 allows a wider range of low-scale housing options, like triplexes and fourplexes, in all Neighborhood Residential zones as part of the urban neighborhood place type. Alternative 3 proposes a total housing growth of 100,000 housing units (20,000 more than Alternative 1) to account for the potential additional housing demand that could be met with broad zoning changes. Eighty thousand units would be located in a similar distribution to Alternative 1, with the 20,000 additional homes accommodated in new housing types in Neighborhood Residential zones. Job growth would be the same as Alternative 1, but 15% of jobs would be located near new housing.
- **Alternative 4: Corridor**—Alternative 4 allows a wider range of housing options only in corridors to focus growth near transit and amenities. This alternative would increase production of both ownership and rental housing options in various neighborhoods and support City and regional investment in transit. Eighty thousand units would be located in a similar distribution to Alternative 1, with 20,000 additional homes accommodated in new housing types in the corridors, for a total of 100,000 new homes. Job growth would be the same as Alternative 1, but 15% of new jobs would be located near new housing to provide local shopping and services.
- **Alternative 5: Combined**—Alternative 5 contemplates the largest increase in supply and diversity of housing across Seattle except for the Preferred Alternative. It includes the strategies for encouraging housing growth in Alternatives 2, 3, and 4 plus additional changes to existing urban center and village boundaries and changes to new place type designations. Alternative 5 assumes 120,000 new housing units (40,000 more than Alternative 1) to account for the potential additional housing demand that could be met within the areas of change identified in Alternatives 2, 3, and 4 as well as changes to existing and new centers and villages. Eighty thousand units would be located in a similar distribution to Alternative 1, with the additional 40,000 units accommodated multiple areas of change. Job growth would be the same as Alternative 1. The distribution of jobs and housing would be a combination of the other alternatives.
- **Preferred Alternative: Mayor's Recommended Plan**—the Preferred Alternative includes the Mayor's Recommended Growth Strategy reflected in the proposed One Seattle Comprehensive Plan and the implementing zoning and development regulations. The plan and implementing zoning and development regulations were considered by the public during the Draft EIS and Draft Plan comment periods and public engagement opportunities. Proposed growth is 120,000 households similar to Alternative 5 (40,000 more than Alternative 1). The Preferred Alternative studies 158,000 jobs for the period 2024-2044.

In addition to reviewing conditions and impacts citywide, this EIS also provides a focused review of the 130th and 145th Street Station Area Plan and options for the City to streamline future environmental review in that area, which may include a planned action (RCW 43.21c.440), infill exemption (RCW 43.21C.229), or other tools available under state legislation (e.g., SB 5818).

Proponent & Lead Agency

City of Seattle Office of Planning and Community Development

Location

Seattle city limits

Tentative Date of Implementation

June 2025

Responsible SEPA Official

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Required Approvals

All Comprehensive Plan amendments and implementing regulations, including those completed as part of the One Seattle Plan require a 60-day review by the State of Washington Department of Commerce and other state agencies.

The Puget Sound Regional Council (PSRC) will also conduct a comprehensive plan consistency review and transportation certification review with VISION 2050. Countywide Centers will be reviewed by King County for compliance with the King County Countywide Planning Policies. Housing policies will be reviewed by the King County Affordable Housing Committee in

accordance with King County Countywide Planning Policies. Locally, the One Seattle Plan and all related regulatory updates will be considered by the Seattle Planning Commission and its recommendations forwarded to the City Council who will deliberate and determine approval.

Principal EIS Authors & Contributors

Under the direction of the City of Seattle, the consultant team prepared the EIS as follows:

- BERK Consulting (prime): SEPA documentation; Land Use & Shoreline Patterns; Relationship to Plans, Policies, & Regulations; Population, Housing, & Employment; Public Services
- Fehr & Peers: Transportation
- Historical Research Associates: Cultural Resources
- Kimley-Horn: Air Quality & GHG Emissions; Energy & Natural Resources; Noise
- MAKERS: Urban Form
- Parametrix: Earth & Water Quality; Plants & Animals; Utilities
- Schemata Workshop: Urban Form and Environmental Analysis Advisor

Draft EIS Date of Issuance & Comment Period

March 7, 2024

The City of Seattle requested comments from citizens, agencies, tribes, and all interested parties on the Draft EIS from March 7, 2024 to May 6, 2024. Comments were due by **5:00 PM, May 6, 2024**.

Final EIS Date of Issuance

The City reviews public comments and publishes responses in this Final EIS that refines information in the Draft EIS document, provides additional information or corrections, and identifies a Preferred Alternative. Draft Zoning was released for public review in October 2024. The Mayor's Recommended Comprehensive Plan was issued on January 6, 2025.

The Final EIS was issued on January 30, 2025.

Date of Final Action

June 2025

Prior Environmental Review

The current EIS considers the prior evaluation of the Seattle 2035 Comprehensive Plan. The Draft EIS was issued May 4, 2015 and the Final EIS was issued May 5, 2016. These are available at https://www.seattle.gov/opcd/ongoing-initiatives/seattle-2035-comprehensive-plan#projectdocuments.

As a result of the Seattle Transportation Plan and ongoing development of the Comprehensive Plan Transportation Element and Capital Facility Element, proposed transportation investments are evaluated in the Final EIS. The Seattle Transportation Plan EIS was published as a Draft EIS August 31, 2023 at https://content.govdelivery.com/accounts/WASEATTLE/bulletins/36de53e. The Final EIS was published on February 29, 2024: https://content.govdelivery.com/accounts/WASEATTLE/bulletins/38e18aa.

Location of Background Data

You may review the City of Seattle website for more information at https://www.seattle.gov/opcd/one-seattle-plan. Please see the contact person above if you desire clarification or have questions.

Purchase/Availability of Final EIS

The Final EIS can be downloaded from the City of Seattle's website at https://www.seattle.gov/opcd/one-seattle-plan. A hard copy or thumb drive are available for purchase at cost (see the contact person above to arrange).

DISTRIBUTION LIST

Federal & Tribal Agencies

Muckleshoot Indian Tribe
Puyallup
Snoqualmie Indian Tribe
Suquamish Tribe
Tulalip Tribes
National Oceanic and Atmospheric Administration Fisheries, National Marine Fisheries Service
National Oceanic and Atmospheric Administration Fisheries, Section 7
U.S. Army Corps of Engineers
U.S. Department of Agriculture, Wildlife Services Division
U.S. Department of Fish & Wildlife Services
U.S. Department of Housing & Urban Development
U.S. Environmental Protection Agency
USDA-Wildlife Services Division

State Agencies

Department of Archaeology & Historic Preservation
Department of Commerce
Department of Commerce, Growth Management Services
Department of Ecology
Department of Fish & Wildlife
Department of Natural Resources
Department of Transportation, SEPA Reviews
Department of Transportation, Development Services
Puget Sound Partnership
Washington Conservation Commission

Regional & County Agencies

King County Department of Housing and Community Development
King County Department of Natural Resources
King County Department of Transportation
King County Environmental Planning, Wastewater Treatment Division
King County Executive's Office
King County Office of Performance, Strategy, and Budget
King County Metro, Transit and Environmental Planning

King County Regional Water Quality Committee
King County Wastewater Treatment Division
Port of Seattle
Puget Sound Clean Air Agency
Puget Sound Regional Council
Public Health—Seattle & King County
Sound Transit, Planning, Environment, and Project Development Division

Seattle, Adjacent Jurisdictions, Service Providers

City of Shoreline
City of Burien
Puget Sound Energy
Century Link
Xfinity
Centrio
Seattle City Light
Seattle Housing Authority
Seattle City Council Legislative Department
Seattle Department of Construction and Inspections
Seattle Department of Education and Early Learning
Seattle Department of Neighborhoods
Seattle Department of Neighborhoods, Historic Preservation Program
Seattle Department of Transportation
Seattle Finance and Administrative Services
Seattle Fire Department
Seattle Law Department
Seattle Office of Economic Development
Seattle Office of Emergency Management
Seattle Office of Housing
Seattle Office of Planning & Community Development
Seattle Office of the Mayor
Seattle Parks and Recreation
Seattle Police Department
Seattle Public Library
Seattle Public School
Seattle Public Utilities

Community Organizations & Individuals

Commenters on the Draft EIS (see Chapter 4)
Duwamish Tribe
Seattle Times
United Indians of All Tribes

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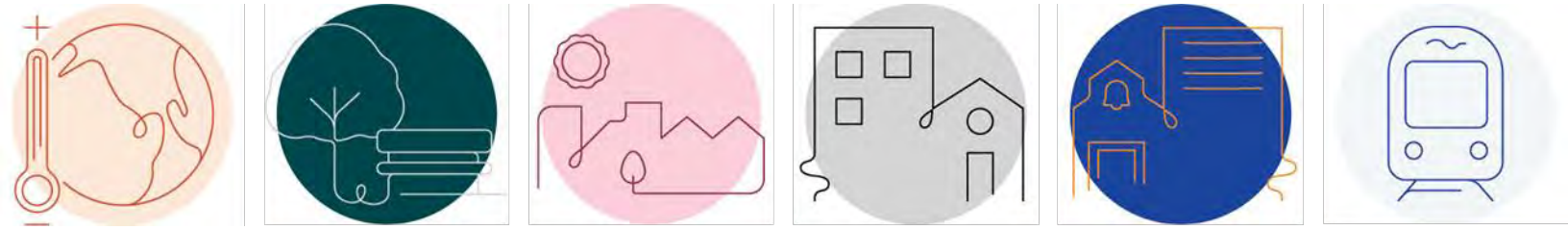
1 SUMMARY



Source: City of Seattle, 2023.

1.1 Purpose

This chapter summarizes the proposals, alternatives, and environmental review findings in the ~~Draft~~ Final EIS. Details of the alternatives are addressed in **Chapter 2**, and the full environmental evaluation and mitigation measures are in **Chapter 3**. **Chapter 4** contains responses to comments on the Draft EIS. This Final EIS identifies track changes where the Draft EIS was clarified or corrected or to reference the Preferred Alternative.

Seattle's Comprehensive Plan defines the vision for how the City will grow. The existing Plan was adopted in 2016; the next required update ~~is~~ was due in 2024 with implementing regulations regarding middle housing due by 2025.

The Comprehensive Plan update will guide decisions about where to locate housing and jobs, and where and how to invest in transportation, utilities, parks, and other public assets as well as guide implementing development standards. The goal of the Plan update is to make the City more equitable, livable, sustainable, and resilient for today's communities and future residents. A subarea is reviewed in greater detail at the 130th and 145th Station Area as a result of a station area planning process ongoing since 2019.

This ~~Draft~~ Final EIS identifies and examines ~~five~~ six alternatives, which represent different ways of implementing land use concepts to achieve the City's objectives. This includes a No Action Alternative to serve as the baseline for comparing the potential impacts of the action alternatives. Each alternative is summarized below in **Exhibit 1.1-1** and described in greater detail in **Section 1.4**. The final plan and implementing legislation could implement a specific alternative or a combination of changes analyzed in different alternatives.

Hing Hay Park. Source: City of Seattle, 2023.

Exhibit 1.1-1 Alternatives Summary

Alternative 1: No Action

Maintains the status quo—implementing existing Seattle 2035 Comprehensive Plan and focusing housing/job growth in existing urban centers and urban villages. 80,000 new homes and 158,000 new jobs would be added over the next 20 years.

130th and 145th Station Areas: Retains current zoning. 194 new homes and 109 new jobs would be added around the 130th station area. 646 new homes and 607 new jobs would be added around the 145th station area.

Alternative 2: Focused

Creates a neighborhood center designation (like urban village, but smaller and lower intensity) around certain existing neighborhood business districts. Neighborhood centers could have a range of housing from duplexes to 7 story stacked housing.

100,000 new homes and 158,000 new jobs The additional 20,000 homes are located in neighborhood centers; 15% of new jobs would be shifted based on location of new housing.

130th/145th Station Area: Designate 3 new neighborhood centers, creating mixed-use nodes with heights up to 80 feet near transit. 1,049 new homes and 284 new jobs around 130th Street. 1,159 new homes and 695 new jobs around 145th Street.

Alternative 3: Broad

Broadens the range of low-scale housing options allowed in all Neighborhood Residential zones (which currently allow only detached homes and accessory dwelling units) as part of a new urban neighborhood place type. Housing in the urban neighborhood place type could include detached and attached homes including duplexes, triplexes, and fourplexes as well as stacked flats and sixplexes on larger lots.

100,000 new homes and 158,000 new jobs. The additional 20,000 homes are located within Neighborhood Residential zones; 15% of new jobs would be shifted based on the location of new housing.

130th/145th Station Area: No changes beyond changes to Neighborhood Residential described above.

Alternative 4: Corridor

Allows wider range of housing options in corridors to focus growth within a short walk of frequent transit and amenities. Corridors could have a range of housing options from duplexes to 5 story stacked housing or higher heights in existing multifamily/commercial areas.

100,000 new homes and 158,000 new jobs. The additional 20,000 homes are located in corridor areas; 15% of new jobs would be shifted based on location of new housing.

130th/145th Station Area: No changes beyond changes to corridors described above.

Alternative 5: Combined

Allows the largest increase in supply and diversity of housing across Seattle among the alternatives, except for the Preferred Alternative, by including strategies from Alternatives 2, 3, and 4 plus designating Ballard as a regional center, expanding boundaries of seven existing urban centers (formerly called urban villages), and designating the 130th Station Area as an urban center.

Distribution of housing units and jobs is a combination of other alternatives but accommodates a total of 120,000 new homes and 158,000 new jobs.

130th/145th Station Area: Adds 1,644 new homes and 356 new jobs around a new urban center at 130th Street and 1,059 new homes and 648 new jobs around a new neighborhood center at 145th Street.

Preferred Alternative

Includes the Mayor's Recommended Growth Strategy in the proposed One Seattle Comprehensive Plan and One Seattle Zoning Update. Allows an increase in supply and diversity of housing across Seattle similar to Alternative 5 plus designated Ballard as a regional center, expanding boundaries of nine existing centers (formerly called urban villages), and designating the 130th Station Area as an urban center.

Like Alternative 5, the Preferred Alternative accommodates a total of 120,000 new homes and 158,000 new jobs.

130th/145th Station Area: Adds 1,500 new homes and 360 new jobs around a new urban center at 130th Street and 652 new homes and 298 new jobs around a new neighborhood center at 145th Street.

Note: The Preferred Alternative was added to this exhibit since the Draft EIS—edits to Alternatives 1–5 are reflected with underlined text.

Sources: City of Seattle, 2024~~3~~; BERK, 2024~~3~~.

1.2 SEPA Process

This document is a non-project EIS that analyzes a range of legislative changes that will implement the One Seattle Plan across the study area. Under the State Environmental Policy Act (SEPA), agencies conduct environmental review of actions that could affect the environment—including policy and regulation changes like the One Seattle Plan. Preparation of an EIS is required for actions that have potentially significant impacts on the built or natural environment so that the public, agencies, tribes, and City decision-makers have information about the environmental effects of changes before a decision is made.

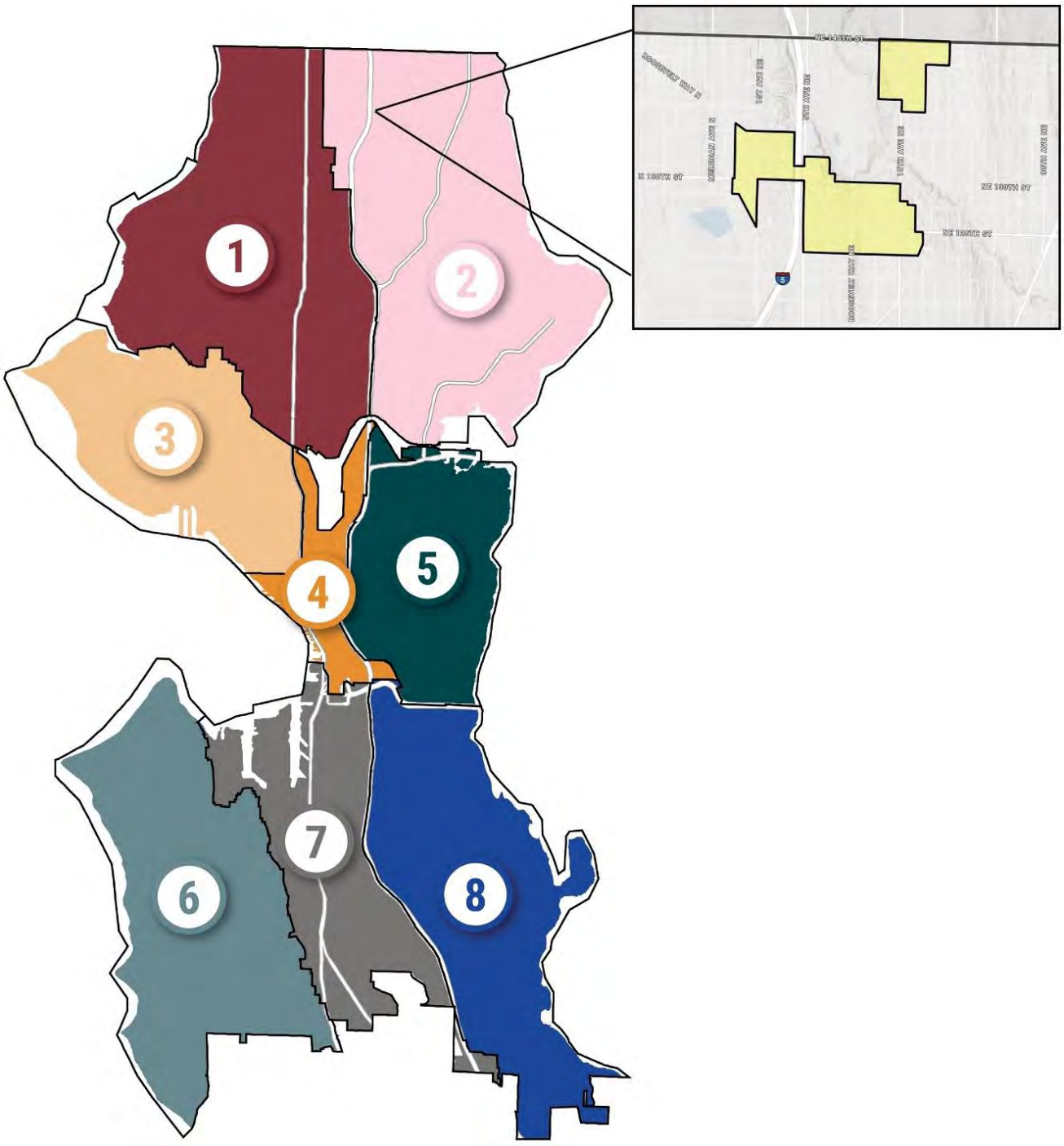
As part of scoping, the City identified a range of elements of the environment that should be analyzed in the EIS: earth & water quality, air quality/greenhouse gas (GHG), plants & animals, energy & natural resources, noise, land use patterns, historic resources, population, employment, & housing, transportation, and public services & utilities. ~~This document is a~~A Draft EIS ~~that is being~~was provided in March 2024 in order to solicit public feedback. ~~It is anticipated that the Final EIS will come out with the Mayor's Recommended Plan in Fall of 2024.~~ This Final EIS addresses the Mayor's Proposed One Seattle Plan Comprehensive Plan Update, issued in January 2025 ("Proposed Plan").

For a summary of public comment opportunities, please see the Fact Sheet and the project website: https://www.seattle.gov/opcd/one-seattle-plan.

1.3 Study Area

The study area includes the full city limits and has been divided into eight analysis areas. A subarea is also reviewed in greater detail at the 130th and 145th Station Area as a result of a station area planning process ongoing since 2019. See **Exhibit 1.3-1**.

Exhibit 1.3-1. Analysis Areas and 130th/145th Station Study Area



Source: City of Seattle, 2023; BERK, 2023.

1.4 Objectives, Proposal, & Alternatives

1.4.1 Objectives

The State Environmental Policy Act (SEPA) requires a statement of proposal objectives and the purpose and need to which the proposal for the Comprehensive Plan Update is responding. Alternatives are different means of achieving objectives.

The objectives of the update include:

- Equity:
  - Provide equitable access to housing, jobs and economic opportunities, services, recreation, transportation, and other investments.
  - Center the work with an intersectional, race-conscious lens, informed by a history of racial discrimination and disinvestment.
- Livability: Foster complete neighborhoods where more people can walk or bike to everyday destinations such as local shops, parks, transit, cultural amenities, and services.
- Affordability: Increase the supply of housing to ease increasing housing prices caused by competition for limited supply and create more opportunities for income-restricted affordable housing.
- Inclusivity:
  - Increase diversity of housing options in neighborhoods throughout Seattle to address exclusivity and allow more people to live and stay in a variety of neighborhoods.
  - Reduce residential displacement and support existing residents, particularly low-income households, who are struggling to stay in their neighborhoods.
- Climate resiliency: Reduce emissions from buildings and transportation and promote adaptations to make our city more capable of withstanding the impacts of climate change.
- Consistency with other Plans and Policies: Meet state and regional policies and requirements for the Comprehensive Plan Update including, but not limited to growth and housing affordability targets.

In addition to the citywide objectives, the vision statement in the "130th & 145th Station Area Planning Plan for Public Review", July 2022 serves as an objective for that study area:

> *The 130th and 145th Station Area is a lively, walkable, and welcoming North Seattle neighborhood. Major streets have roomy, tree-lined sidewalks, and other green infrastructure. Bicycle infrastructure makes everyday trips to transit stations, schools, and neighboring urban villages enjoyable and safe. An array of housing offers options affordable to a broad range of incomes and lifestyles. Small shops and cafes near the station cater to locals, commuters, students, and visitors. Local and citywide lovers of nature, recreation and culture treasure the abundant greenspaces and unique cultural events so easily reached by walking, biking, or transit.*

1.4.2 Proposal

Legislation is proposed to update Seattle's Comprehensive Plan, which is the vision for how Seattle grows and makes investments and implementing development standards. The Comprehensive Plan's goals and policies and future land use ~~plan~~ map guide ~~decisions about~~ where ~~the City should expect and support~~ new housing and jobs are directed, and where the City invests in transportation, utilities, parks, and other public assets. The Comprehensive Plan must be updated by 2024 to address state and regional goals and requirements with implementing regulations regarding middle housing due by 2025. The Comprehensive Plan will also address racial inequities, housing costs, access to economic opportunity and education, and climate change. As part of the Comprehensive Plan Update, the City will also consider updates to zoning and development regulations to implement the Plan. ~~Draft~~ Final EIS alternatives vary levels, types, and locations of growth. ~~Five~~ Six alternatives are described further in **Section 1.4** and **Chapter 2**:

- **Alternative 1: No Action**—The No Action Alternative is required under the State Environmental Policy Act (SEPA). It would continue implementation of the current Seattle 2035 Comprehensive Plan. The No Action Alternative for the One Seattle Plan maintains the status quo of focusing most housing and jobs within existing urban centers and villages with no change to land use patterns. It also incorporates changes recently adopted by the Seattle City Council to implement the Industrial and Maritime Strategy. It would meet regionally set growth targets by adding 80,000 new homes and 158,000 jobs during the period 2024-2044.
- **Alternative 2: Focused**—Alternative 2 includes the creation of additional areas of focused growth called neighborhood centers to create more housing around shops and services

Place Types

- **Regional Centers** are regionally designated places with a diverse mix of uses, housing, and employment They include several centers that comprise greater Downtown along with the University District and Northgate. These contain Seattle's densest neighborhoods and a large share of the city's jobs.
- **Urban Centers** are dense, walkable, mixed-use places with a wide range of housing and businesses located near transit, amenities, and jobs.
- **Neighborhood Center** are places with a wide range of housing and businesses that primarily serve the local community. These areas resemble urban villages, but with a smaller size and lower intensity of allowed development.
- **Corridors** are areas near frequent transit and large parks that allow a wide range of housing types in areas currently zoned primarily for detached homes (within a 10-minute walk from a light rail station and a five-minute walk from frequent bus transit service and entrances to large parks). Corridors also include areas already zoned for multifamily and commercial use and could have small increases in height.
- **Urban Neighborhoods** represent low-scale, primarily residential areas. This place type would primarily allow housing types such as detached homes, duplexes, triplexes, fourplexes, and stacked flats. This place type would allow flexibility for new forms of housing in areas currently zoned primarily for detached homes.
- **Manufacturing and Industrial Centers** are regionally designated industrial job centers. The One Seattle Plan process would not change the boundaries of these centers nor the goals and policies for these areas which were recently updated as part of the Industrial and Maritime Strategy project.

dispersed across the city. Neighborhood centers would be similar to urban villages in that they would allow a wide range of housing types and commercial space, but with a smaller geographic size and lower intensity of allowed development. This Alternative would result in a greater range of housing options with amenities and services in many neighborhoods. For the period 2024-2044, Alternative 2 includes more housing than Alternative 1 at 100,000 new homes. Jobs would be similar to Alternative 1 at 158,000 new jobs. While the number of total new jobs would be the same for each of the alternatives, their distribution would vary. Compared to Alternative 1, about 15% of new jobs in each action alternative are assumed to be located in proportion to the location of new housing. This assumption would account for the desire of many businesses such as local retail, eating places, and services, to locate near housing. Eighty thousand new homes would be located in a similar distribution to Alternative 1, with the additional 20,000 accommodated in neighborhood centers.

- **Alternative 3: Broad**—Alternative 3 allows a wider range of low-scale housing options, like duplexes, triplexes, fourplexes and stacked flats, in all Neighborhood Residential (NR) zones as part of a new urban neighborhood place type. Alternative 3 proposes a total housing growth of 100,000 housing units (20,000 more than the No Action Alternative) to account for the potential additional housing demand that could be met with broad zoning changes. Eighty thousand new homes would be located in a similar distribution to Alternative 1, with the additional 20,000 accommodated in new housing types within urban neighborhood areas. Jobs would be similar to Alternative 1 in number with distribution of 15% of jobs proximate to new housing.
- **Alternative 4: Corridor**—Alternative 4 allows a wider range of housing options only in corridors to focus growth near transit and amenities. This alternative would increase production of housing in various neighborhoods and support city and regional investment in transit. Eighty thousand new homes would be located in a similar distribution to Alternative 1, with an additional 20,000 accommodated in new housing types within the corridors, for a total of 100,000 new dwellings. New jobs would be similar to Alternative 1 at 158,000, but 15% of new jobs would be located in proximity to the new housing to provide local shopping and services.
- **Alternative 5: Combined**—Alternative 5 has the largest increase in supply and diversity of housing across Seattle except for the Preferred Alternative. It includes the strategies for encouraging housing growth in Alternatives 2, 3, and 4 plus designating Ballard as a regional center, expanding boundaries of seven existing urban centers (formerly called urban villages), and designating the 130th Station Area as an urban center. Alternative 5 would assume 120,000 new homes (40,000 more than the No Action Alternative) to account for the potential additional housing demand that could be met within the areas of change identified in Alternatives 2, 3, and 4 as well as changes to existing and new centers and villages. Eighty thousand new homes would be located in a similar distribution to Alternative 1, with the additional 40,000 units accommodated across multiple areas of change. The distribution of jobs and housing would be a combination of the other alternatives.

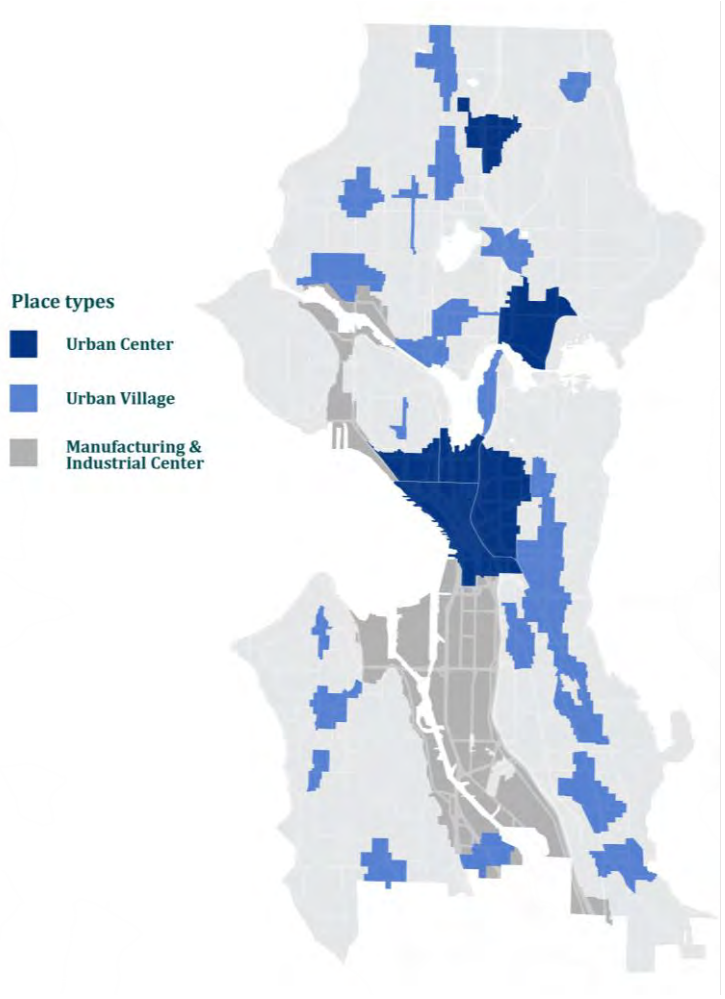
- **Preferred Alternative: Mayor's Recommended Plan**—the Preferred Alternative includes the Mayor's Recommended Growth Strategy reflected in the proposed One Seattle Comprehensive Plan and the One Seattle Zoning Update. The plan and implementing zoning consider the public comment during the Draft EIS and Draft Plan comment periods and public engagement opportunities. The growth studied, similar to Alternative 5, totals at 120,000 new dwellings (40,000 more than Alternative 1) and 158,000 jobs (the same as all alternatives) for the period 2024-2044.

In addition to reviewing conditions and impacts citywide, this EIS also provides a focused review of the 130th and 145th Street Station Area Plan and options for the City to streamline future environmental review in that area, which may include a planned action (RCW 43.21c.440), infill exemption (RCW 43.21C.229), or other tools available under state legislation (e.g., SB 5818).

1.4.3 Alternative 1: No Action

Citywide Growth Concept: Alternative 1, No Action, assumes the continuation of the Seattle 2035 Comprehensive Plan. Even without making any changes to the City's zoning, the existing Comprehensive Plan and implementing regulations would add 80,000 new homes and 158,000 jobs over the next 20 years, based on growth targets adopted by the King County Growth Management Council.[1] These homes and jobs will be distributed across the city based on observed growth between 2010 and 2020 and the distribution of growth in the Seattle 2035 Comprehensive Plan. In addition, growth in each urban center and village would not exceed existing zoned capacity. While there have been significant increases in the number of people working from home in recent years, job locations are frequently indicated based on the office in which the company is located, rather than where the work takes place. Consequently, future growth may look similar to past growth even if the portion of people working from home remains high.

Exhibit 1.4-1. Alternative 1: No Action



Note: See **Exhibit 2.1-1** in **Chapter 2** for a crosswalk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~A~~lternatives ~~2-5~~.
Source: City of Seattle, 2023.

130th/145th Station Area: The current Comprehensive Plan and zoning designations would be retained under Alternative 1, No Action, in the 130th/145th Station Area. Neighborhood Residential zones would continue to allow three-story single-purpose residential development around the future light rail station at 130th and some 4-8 story multifamily uses near the 145th BRT station. Based on current plans and zoning, this ~~Draft~~ Final EIS studies the addition of 194 housing units/109 jobs around the 130th Station Area and 646 housing units and 607 jobs around 145th Station Area.

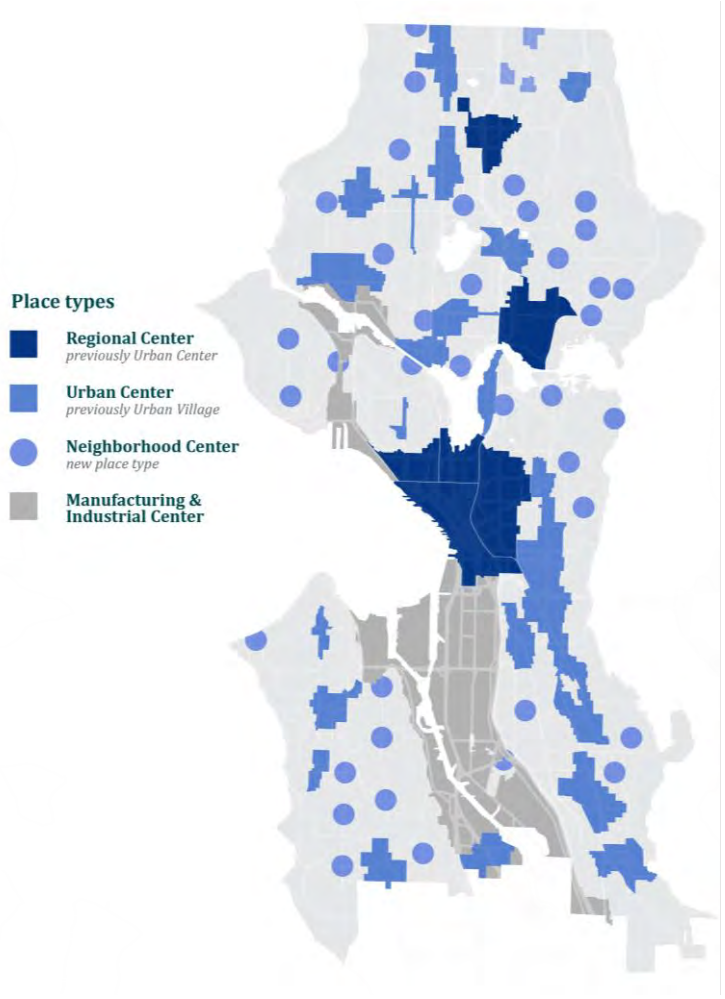
[1] Growth targets were set for the years 2019-2044, but in the EIS have been adjusted to match the required 20-year planning period for 2024-2044, to account for population, housing, and employment change for the years 2019-2023.

1.4.4 Alternative 2: Focused

Citywide Growth Concept: Alternative 2 would designate additional areas of focused growth called neighborhood centers to create more housing around shops and services. Neighborhood centers would be similar to urban centers (formally known as urban villages) since they would allow a wide range of housing types and commercial space, but with a smaller geographic size and lower intensity of allowed development. Neighborhood centers could have a range of housing from townhouses to 7 story stacked housing.

Alternative 2 studies a total housing growth of 100,000 housing units (20,000 more than the No Action Alternative) to account for the potential additional housing demand assumed within neighborhood centers. Eighty thousand new homes would be located in a similar distribution to Alternative 1, with an additional 20,000 accommodated in new housing types within neighborhood centers. Neighborhood centers in areas with low displacement risk are allocated 50% more homes than those in areas with high displacement risk.

Exhibit 1.4-2. Alternative 2: Focused



Note: See **Exhibit 2.1-1** in **Chapter 2** for a crosswalk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~A~~lternatives ~~2-5~~.
Source: City of Seattle, 2023.

130th/145th Station Area: Alternative 2 would implement a subarea plan that would:

- Create city and community concepts around land use, transportation and other policies and investments for fast, reliable transit and compact walkable neighborhoods.
- Align with the City of Seattle Comprehensive Plan (One Seattle Plan).
- Lead with equity to address past systemic inequities and minimize factors that contribute to displacement.
- Address Climate Change by reducing vehicle miles traveled, car dependency and greenhouse gas (GHG) emissions.

Alternative 2 would designate three new neighborhood centers. Growth would equal: 1,049 housing units/284 jobs at 130th Street and 1,159 housing units/695 jobs at 145th Street.

1.4.5 Alternative 3: Broad

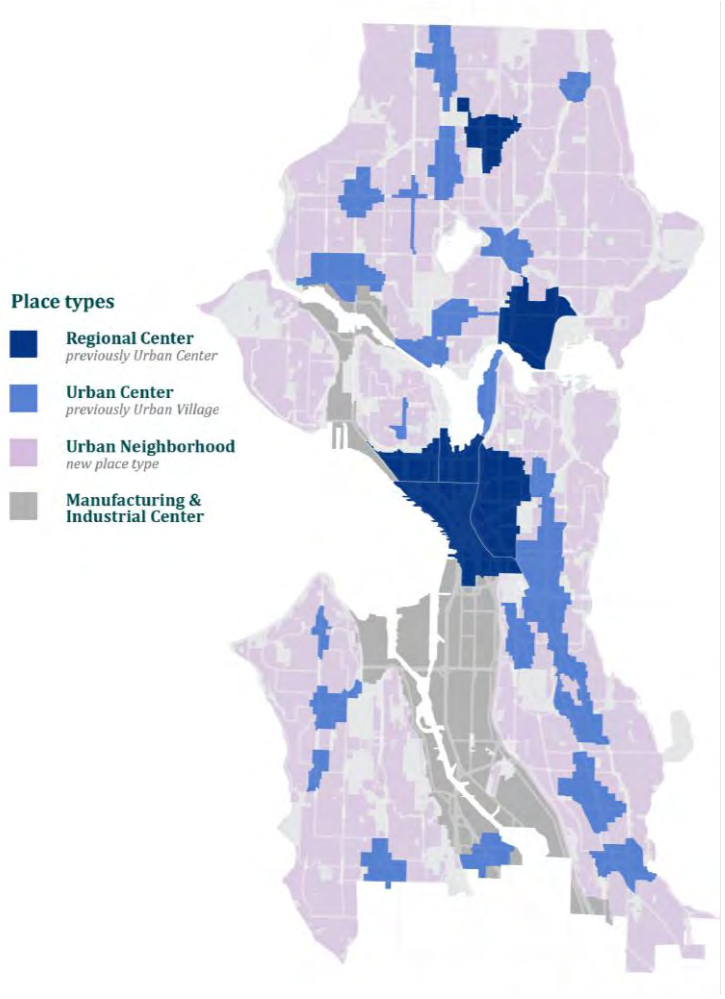
Citywide Growth Concept: This alternative allows a wider range of low-scale housing options, like triplexes and fourplexes, in all Neighborhood Residential (NR) zones as part of a new urban neighborhood place type. This approach would:

- Expand housing choices in all neighborhoods.
- Increase production of homeownership options.
- Address exclusionary nature of current zoning.
- Allow more housing options near existing large parks and other neighborhood amenities.

Housing in the urban neighborhood place type could include duplexes, triplexes, and fourplexes as well as stacked flats and sixplexes on larger lots.

Alternative 3 studies a total housing growth of 100,000 housing units (20,000 more than the No Action Alternative) to account for the potential additional housing demand that can be accommodated with broad zoning changes. Eighty thousand units would be located in a similar distribution to Alternative 1, with an additional 20,000 accommodated within urban neighborhood areas.

Exhibit 1.4-3. Alternative 3: Broad



Notes: The urban neighborhood areas shown on this map do not reflect the viability of redevelopment on any specific property. Factors such as property ownership, existing uses, and presence of environmentally critical areas will be factored into the distribution of housing and jobs studied in the EIS analysis. See **Exhibit 2.1-1** in **Chapter 2** for a crosswalk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~A~~lternatives ~~2-5~~. Place type names were corrected in the legend for the Final EIS to reflect the proposed place type names.
Source: City of Seattle, 2024~~3~~.

Alternative 3 studies the same number of jobs as the No Action Alternative but would include a small shift in the distribution of jobs and commercial space toward existing urban neighborhood areas to reflect local demand consistent the distribution of new housing.

130th/145th Station Area: Under this alternative, there would be no changes to the future land use map within this area but there would be more flexibility in urban neighborhood areas for missing middle housing as well as corner stores and at-home businesses.

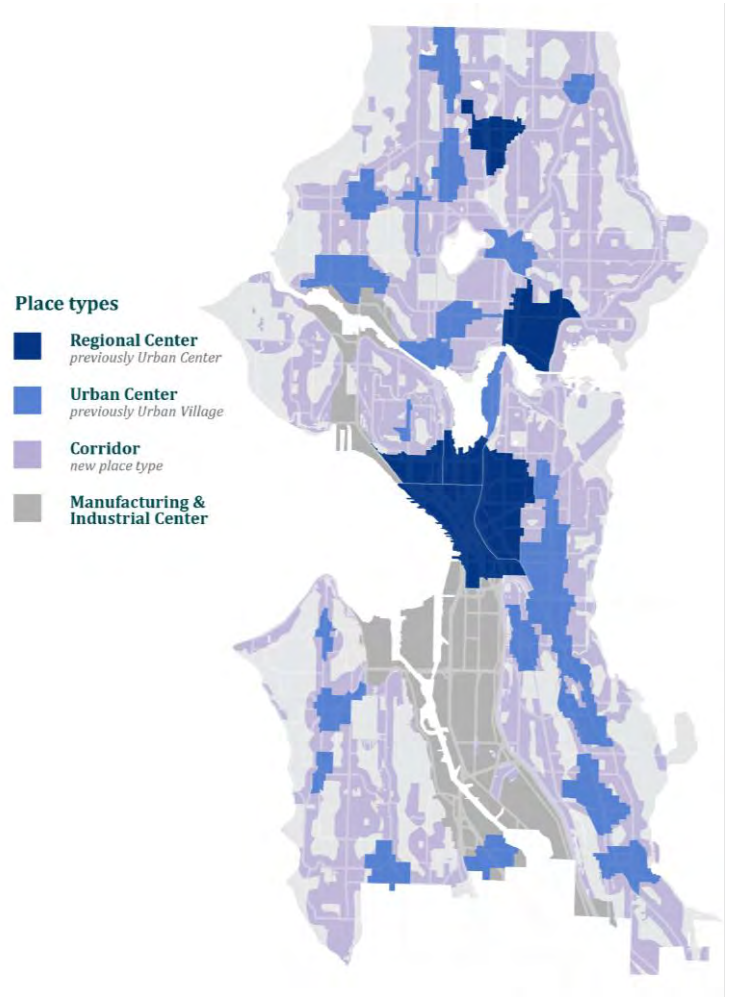
1.4.6 Alternative 4: Corridor

Citywide Growth Concept: This alternative would allow a wider range of housing options only in corridors to focus growth within a short walk of transit and amenities. This alternative would increase production of both homeownership and rental options in various neighborhoods and support city and regional investment in transit. Corridors could have a range of housing options from duplexes to 5-story stacked housing or higher heights in existing multifamily/commercial areas.

Alternative 4 studies a total housing growth of 100,000 housing units (20,000 more than the No Action Alternative) to account for the potential additional housing demand that is expected within the corridors. Eighty thousand units would be located in a similar distribution to Alternative 1, with 20,000 additional homes accommodated within corridors. Alternative 4 would have the same number of jobs as the No Action Alternative but includes a small shift in the distribution of jobs and commercial space toward corridors, consistent with the distribution of new housing.

Corridor areas would be the largest single place type and would accommodate the second highest housing growth after regional centers. Most jobs would be generated in the regional centers and the manufacturing industrial centers.

Exhibit 1.4-4. Alternative 4: Corridor



Notes: The Corridors shown on this map do not reflect the viability of redevelopment on any specific property. Factors such as property ownership, existing uses, and presence of Environmentally Critical Areas will be factored into the distribution of housing and jobs studied in the EIS analysis. See **Exhibit 2.1-1** in **Chapter 2** for a crosswalk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~A~~lternatives ~~2–5~~.
Source: City of Seattle, 2023.

130th/145th Station Area: Within the station areas, a wider range of housing options would be allowed only in corridors consistent with the citywide approach.

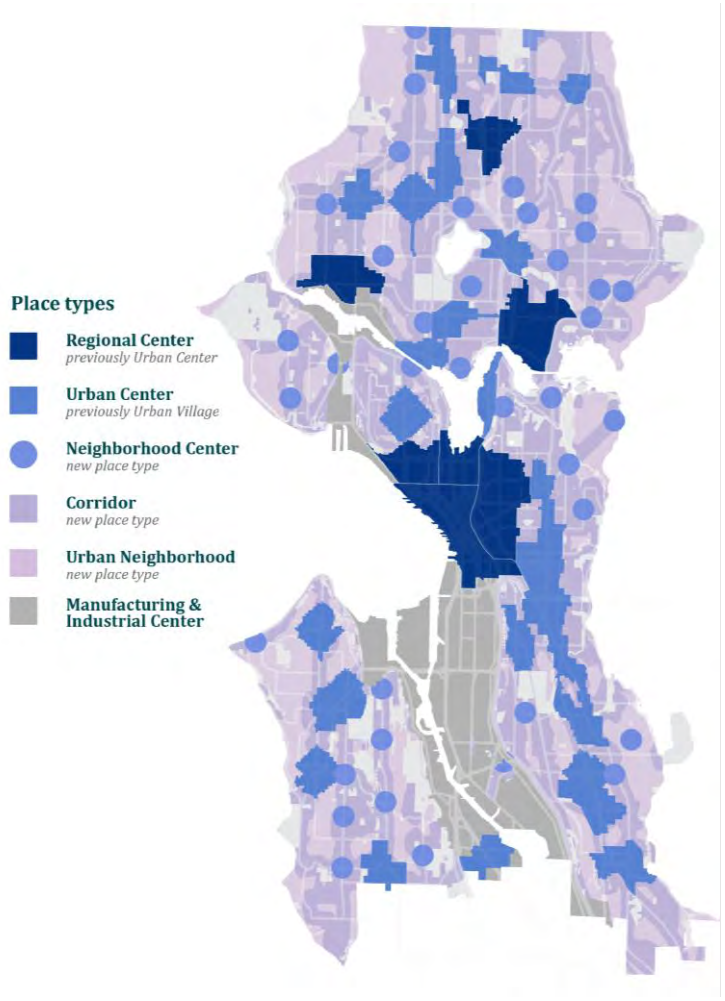
1.4.7 Alternative 5: Combined

Citywide Growth Concept: Alternative 5 anticipates the largest increase in supply and diversity of housing across Seattle <u>along with the Preferred Alternative</u>. It includes the strategies for encouraging housing growth in Alternatives 2, 3, and 4 plus additional changes to existing urban center and village boundaries and changes to place type designations. This alternative seeks to:

- Accommodate abundant housing in neighborhoods across the city.
- Promote a greater range of rental and ownership housing.
- Address past underproduction of housing and rising housing costs.

Alternative 5 assumes growth of 120,000 housing units (40,000 more than the No Action Alternative) to account for the potential additional housing growth that could occur under a combination of changes identified in Alternatives 2, 3, and 4 plus designating Ballard as a regional center, expanding boundaries of seven existing urban centers (formerly called urban villages), and designating the 130th Station Area as an urban center. Eighty thousand units would be located in a similar distribution to Alternative 1, with the additional 40,000 distributed based on a combination of Alternatives 2, 3, and 4. The distribution of jobs and housing would be a combination of the other alternatives after accounting for expanded urban village boundaries and potential changes to place type designations.

Exhibit 1.4-5. Alternative 5: Combined



Notes: The corridors and urban neighborhood areas shown on this map do not reflect the viability of redevelopment on any specific property. Factors such as property ownership, existing uses, and presence of environmentally critical areas will be factored into the distribution of housing and jobs studied in the EIS analysis. See **Exhibit 2.1-1** in **Chapter 2** for a crosswalk of existing place types (existing and Alternative 1) versus proposed place type names under <u>the other a</u>~~A~~lternatives ~~2–5~~. <u>Place type names were corrected in the legend for the Final EIS to reflect the proposed place type names.</u>
Source: City of Seattle, 202<u>4</u>~~3~~.

130th/145th Station Area: Under Alternative 5, an urban center would be created straddling the west and east sides of I-5 at the Sound Transit light rail station. This alternative adds 1,644 housing units/356 jobs around 130th Street and 1,059 housing units/648 jobs around 145th Street.

1.4.8 Preferred Alternative

Note: This Preferred Alternative section was added since the Draft EIS.

The Preferred Alternative includes the Mayor's Recommended One Seattle Comprehensive Plan. The Preferred Alternative studied growth similar to Alternative 5, at 120,000 new dwellings. The Preferred Alternative proposes 158,000 new jobs like other studied alternatives.

The Preferred Alternative place types described in **Section 1.4.2** are implemented by One Seattle Zoning. The Preferred Alternative incorporates ideas developed in Alternatives 1–5. Notable features of this alternative include:

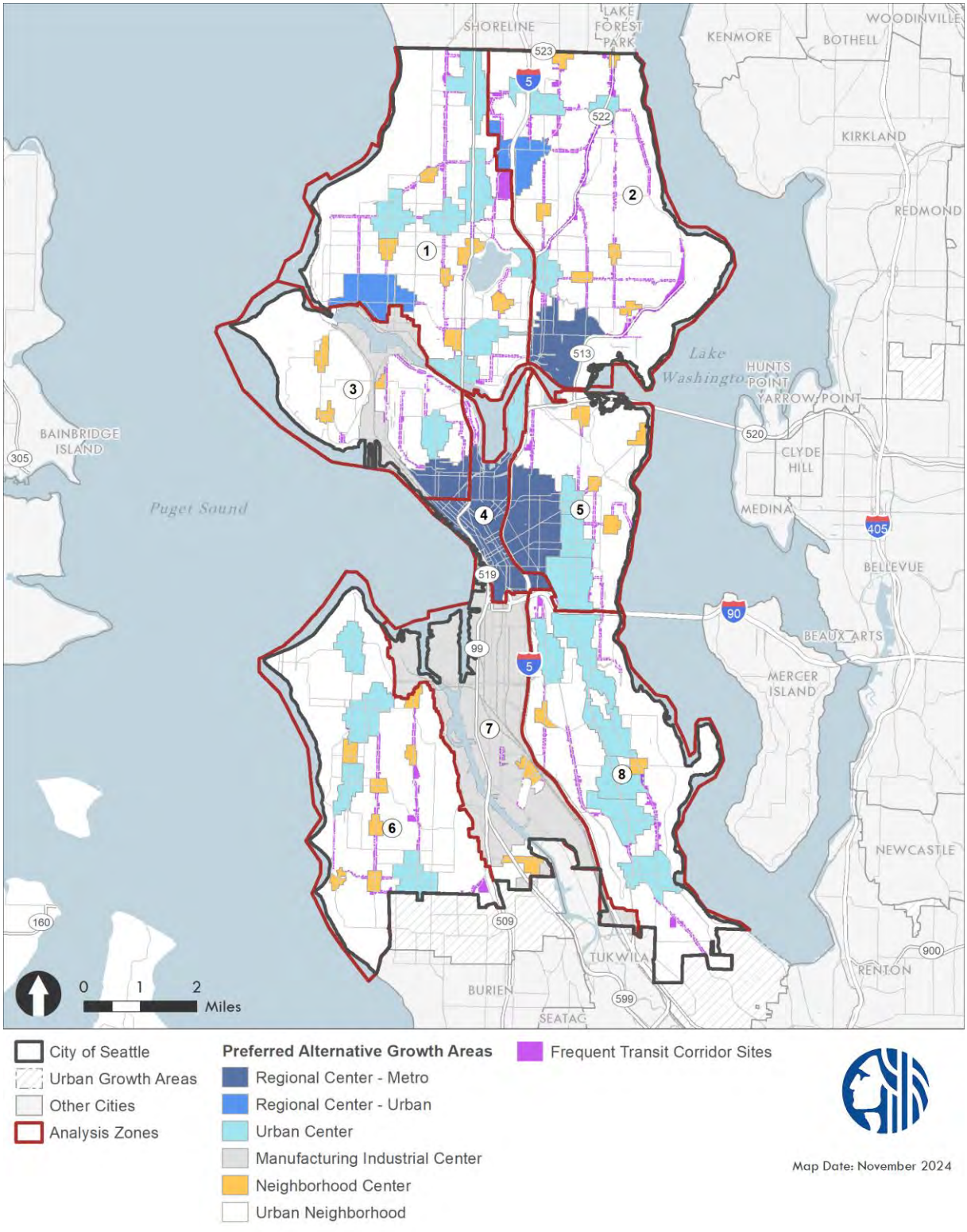
- Regional Centers (7) and Urban Centers (25)
  - Similar to Alternative 5, Ballard would become a regional center
  - Similar to Alternative 5, a new urban center is located at NE 130th Street Light Rail Station
  - Expansions are located at new light rail stations, in Squire Park, and in small centers. This includes expansion of the First Hill/Capitol Hill Regional Center and 23rd & Union–Jackson Urban Center.
- Neighborhood Centers (30)
  - Similar to Alternatives 2 and 5, there are 30 new neighborhood centers. This includes 5 that are expanded or shifted in comparison to Alternatives 2 and 5:
    - North Magnolia (was mostly neighborhood center and urban neighborhood under Alternative 5)
    - High Point (was mostly neighborhood center under Alternative 5)
    - Mid Beacon Hill (was mostly corridor under Alternative 5)
    - Upper Fremont (was mostly neighborhood center under Alternative 5)
    - Hillman City (was mostly corridor under Alternative 5)
  - Additionally, 1 neighborhood center is changed from an urban center considered under Alternatives 1–5 to a neighborhood center (South Park)
- Urban Neighborhood: The urban neighborhood place type is implemented with updated NR zoning to fulfill middle housing requirements in HB 1110[2] as well as implemented with upzones along frequent transit arterials. These concepts were part of Alternatives 4 and 5 in particular.
  - Like other action alternatives, the Preferred Alternative would allow unit lot subdivision in Neighborhood Residential zones.[3] This allowance meets state law and supports housing ownership opportunities and middle housing similar to other action alternatives.

Growth is directed and supported by new plan elements addressing land use, housing, economic development, utilities, transportation, climate change and resiliency, and more. The long term Seattle Transportation Plan concepts are implemented during the 20-year planning period by the Transportation Element and Capital Facilities Plan. The Seattle Transportation Plan EIS (February 2024) and this EIS consider these proposals in **Section 3.10 Transportation.**

[2] House Bill 1110 requires certain cities to allow middle housing types at minimum densities and requires certain development standards for middle housing. Now codified at RCW 36.70A.635-639.

[3] A unit lot subdivision (ULS) creates new lots in a short plat process, except a ULS allows flexible application of zoning dimensional standards. They are one method for dividing multiple housing units on a parcel into individual unit lots for sale to individual owners, providing fee simple homeownership, such as condominium units and townhomes. See: https://deptofcommerce.app.box.com/s/8i72so6zaxmlnmds3kg0dte72g6eehze.

Exhibit 1.4-6. Preferred Alternative Place Types



Source: City of Seattle, 2024.

1.4.9 Summary of Alternatives

Alternative Growth Comparisons

Alternative 1, No Action, studies the impact of adding 80,000 new homes and 158,000 jobs over 20 years, based on growth targets adopted by the King County Growth Management Planning Council.[4] Alternatives 2, 3, and 4 study a total housing growth of 100,000 housing units (20,000 more than Alternative 1, No Action) to account for the potential additional housing that could occur within neighborhood centers, urban neighborhood areas, or corridors. Alternative 5 and the Preferred Alternative assume~~s~~ growth of 120,000 housing units (40,000 more than the No Action Alternative) to account for the potential additional housing that could occur within the areas of change identified in Alternatives 2, 3, and 4 as well as changes to existing and new centers. All alternatives assume the same overall growth in jobs. See **Exhibit 1.4-7**.

Exhibit 1.4-7. Summary of Housing and Job Growth Share—Citywide Alternatives

	Alternative 1: No Action	Alternative 2: Focused	Alternative 3: Broad	Alternative 4: Corridor	Alternative 5: Combined	Preferred Alternative
Housing	80,000	100,000	100,000	100,000	120,000	120,000
Jobs	158,000	158,000	158,000	158,000	158,000	158,000

Note: The Preferred Alternative was added to this exhibit since the Draft EIS—no edits were made to Alternatives 1–5.
Sources: City of Seattle, 2024~~3~~; BERK, 2024~~3~~.

Under all alternatives, 80,000 units would be located in a similar distribution to Alternative 1, meaning that they would be located primarily in existing centers and villages. Under the action alternatives, an additional 20,000 or 40,000 housing units would be accommodated within new place types located throughout the city. This results in a shift in the percent share of growth between study areas. For example, while absolute housing growth in Downtown/South Lake Union (Area 4) is constant at 19,413 housing units for Alternatives 1–5, the percent share of housing growth in Area 4 is lower under all the action alternatives than the No Action Alternative. Under Alternative 5 and the Preferred Alternative, both Areas 1 and 2 in North Seattle receive a greater share of housing growth than Area 4. The Preferred Alternative includes less housing in Area 7 with South Park being designated a neighborhood center rather than an urban center. Area 4 has an assumption of 19,125 units under the Preferred Alternative, similar to and slightly lower than other studied alternatives. The expected growth distribution reflects zoning and capacity. **Exhibit 1.4-8** and **Exhibit 1.4-10** show percent share of housing ~~target~~ growth by study area and alternative, with the two highest study area percent shares under each alternative highlighted orange.

[4] Growth targets were set for the years 2019-2044, but in the EIS have been adjusted to match the required 20-year planning period for 2024-2044, to account for population, housing, and employment change for the years 2019-2023.

Exhibit 1.4-8. Housing Growth Estimates Percent Share by Study Area—Citywide Alternatives

Study Area	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Preferred
Area 1 Northwest	17.2%	18.4%	17.6%	17.2%	17.9%	21.4%
Area 2 Northeast	16.0%	18.3%	20.2%	21.0%	19.6%	19.6%
Area 3 West	7.5%	8.1%	6.7%	6.6%	6.8%	7.5%
Area 4 Downtown/South Lake Union	24.3%	19.4%	19.4%	19.4%	16.2%	15.9%
Area 5 East	16.6%	16.3%	13.8%	13.8%	13.4%	14.7%
Area 6 Southwest	7.7%	9.4%	10.2%	10.1%	11.5%	10.6%
Area 7 Duwamish Manufacturing Center	2.4%	2.3%	1.9%	2.0%	3.0%	1.3%
Area 8 Southeast	8.3%	7.9%	10.2%	9.9%	11.6%	8.9%
Total	**100.0%**	**100.0%**	**100.0%**	**100.0%**	**100.0%**	**100.0%**

Note: The two highest percent shares under each alternative by study area are highlighted orange. The Preferred Alternative was added to this exhibit since the Draft EIS—no edits were made to Alternatives 1–5.
Sources: City of Seattle, 2024~~3~~; BERK, 2024~~3~~.

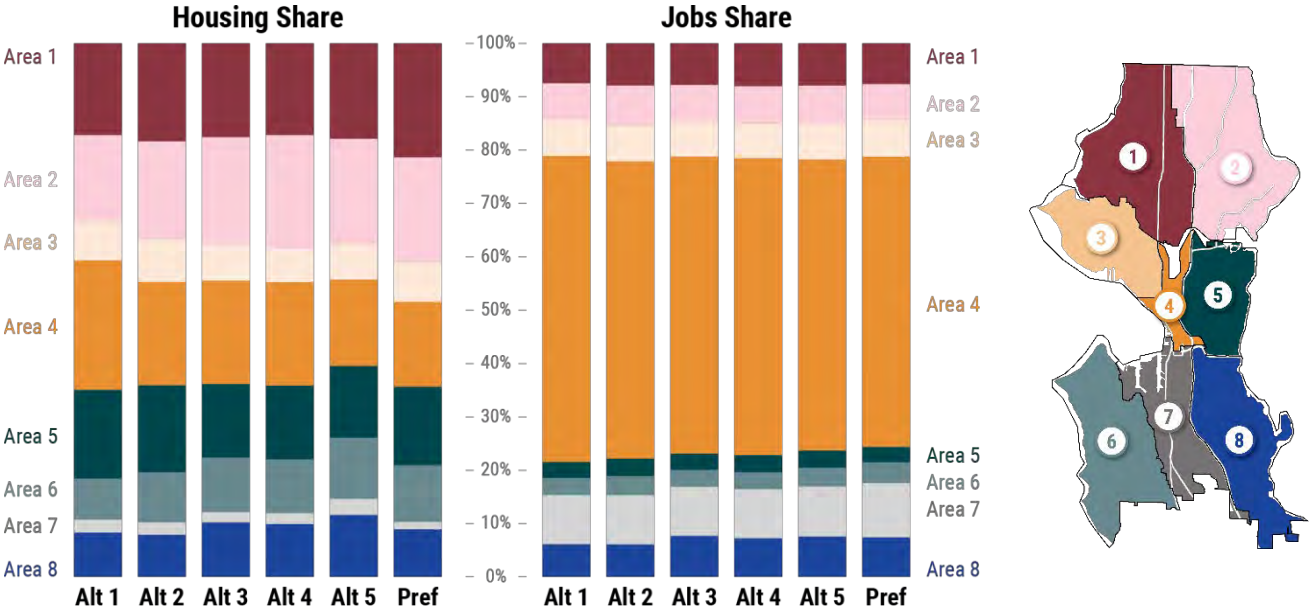
All alternatives assume the same overall growth in jobs with a little over half of job growth in Downtown/South Lake Union (Area 4) and about 9% in the Duwamish Manufacturing Center (Area 7). Alternatives 2, 3, and 4 assume a small job shift from the larger centers towards other place types to reflect local demand consistent with the distribution of new housing. The distribution of jobs and housing under Alternative 5 would be a combination of the other alternatives after accounting for expanded regional and urban center boundaries and potential changes to place type designations. The Preferred Alternative similarly focuses the bulk of jobs in Areas 4 and 7. There are slight shifts in jobs based on an evaluation of capacity and zoning. See **Exhibit 1.4-9** and **Exhibit 1.4-10**.

Exhibit 1.4-9. Job Growth Estimates Percent Share by Study Area—Citywide Alternatives

Study Area	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Preferred
Area 1 Northwest	7.5%	7.9%	7.8%	8.1%	7.9%	7.6%
Area 2 Northeast	6.9%	7.4%	6.9%	6.9%	7.2%	6.7%
Area 3 West	6.7%	6.9%	6.6%	6.6%	6.7%	6.9%
Area 4 Downtown/South Lake Union	57.4%	55.7%	55.7%	55.7%	54.6%	54.4%
Area 5 East	3.0%	3.3%	3.1%	3.2%	3.2%	2.9%
Area 6 Southwest	3.2%	3.5%	3.2%	3.2%	3.5%	3.9%
Area 7 Duwamish Manufacturing Center	9.2%	9.2%	9.2%	9.2%	9.3%	10.1%
Area 8 Southeast	6.1%	6.1%	7.7%	7.2%	7.6%	7.4%
Total	**100.0%**	**100.0%**	**100.0%**	**100.0%**	**100.0%**	**100.0%**

Note: The two highest percent shares under each alternative by study area are highlighted orange. The Preferred Alternative was added to this exhibit since the Draft EIS—no edits were made to Alternatives 1–5.
Sources: City of Seattle, 2024~~3~~; BERK, 2024~~3~~.

Exhibit 1.4-10. Comparison of Housing and Jobs Growth Estimates Percent Share by Study Area—Citywide Alternatives



Note: The Preferred Alternative was added to this exhibit since the Draft EIS—no edits were made to Alternatives 1–5.
Sources: City of Seattle, 2024~~3~~; BERK, 2024~~3~~.

Major Policy Updates

The proposal would update the Seattle Comprehensive Plan to address growth between 2024 and 2044 and ~~adapt~~adopt new policies and codes that help meet the objectives defined in **Section 1.4.** It would also implement text and map amendments to the Comprehensive Plan as well as changes to zoning and development standards in the Seattle Municipal Code and the Building Code. Changes to the Comprehensive Plan would help meet the objectives defined in **Section 1.4.1** and would influence the manner and distribution of projected growth as well as the manner in which the City conducts its operations to promote and achieve other goals such as those related to equity, economic opportunity, environmental sustainability, community, public health, safety, welfare, and service delivery. All Comprehensive Plan elements will be reviewed and updated as part of the proposal. In many cases, proposed policy amendments will reflect changes to state and regional requirements and guidance, incorporate language and editorial changes to policies to increase readability, clarify direction and remove redundancies; and add new or updated information since adoption of the current Comprehensive Plan.

Changes to the Comprehensive Plan could include, but are not limited to:

- Implementing a major update of the Growth Strategy and Future Land Use Map including:
  - Adding neighborhood centers, corridors, and urban neighborhoods as new place types.
  - Combining the multifamily and mixed-use/commercial designations on the Comprehensive Plan's Future Land Use Map categories.
- Updating planned growth assumptions to reflect updated regional targets, market conditions, development capacity, and changes to the growth strategy.

- Updating housing and employment targets for regional centers consistent with VISION 2050.
- Eliminating Growth Targets for urban villages or modifying them to reflect changing market conditions, development capacity, and changes to the growth strategy.
- Identifying strategies for addressing displacement.
- Identifying strategies for meeting jurisdictional affordable housing targets.
- Identifying strategies for meeting additional infrastructure needs.
- Identifying strategies for meeting vehicle miles traveled (VMT), mode shift, and greenhouse gas emission goals.
- Updating the Transportation levels-of-service (LOS) to reflect updated goals, new state guidance, changing conditions, and address concurrency. The long-term Seattle Transportation Plan concepts are implemented during the 20-year planning period by the Transportation Element and Capital Facilities Plan. The Seattle Transportation Plan EIS (February 2024) and this EIS consider these proposals in **Section 3.10 Transportation.**
- Removing volume 2 of the Comprehensive Plan which contains goals and policies excerpted from past neighborhood plans.
- Adding or modifying policies for the growth strategy place types and zone categories.
- Modifying or implementing new policy changes on a wide variety of topics such as equity, complete communities, increasing housing choices, climate change resilience, greenhouse gas reduction strategies, vision zero, zero waste, electrification, decarbonization, essential public facilities, environmentally critical areas, or other topics.

Changes to the Seattle Municipal Code would implement the Growth Strategy in the Comprehensive Plan as well as specific goals and policies, particularly those around land use regulations and housing. Changes to zoning and development standards would support City goals such as allowing more people to walk or bike to everyday needs, encouraging better building design, or reducing the cost of housing. These changes could include, but are not limited to:

- Modifying heights, floor area ratios, lot size, density limits, coverage limits, setbacks, amenity standards, building separations, structure depth, structure width, and other similar standards affecting the scale and form of new construction to implement goals and policies in the update Comprehensive Plan including those around increasing the supply, diversity, and affordability of housing.
- Creating a new Midrise zone.
- Adding or modifying design standards.
- Allowing more flexibility for commercial uses in certain areas such as allowing more retail on arterial streets, increasing flexibility for home businesses, and allowing small-scale commercial uses~~corner stores~~ in Urban Neighborhood Residential and Lowrise zones.
- Allowing more height and/or floor area for projects that provide public open space or that include affordable housing or housing types such as 3- and 4-story stacked flats or projects with shared open space.
- Updating rezone criteria.
- Reducing or eliminating residential parking minimums citywide.

- Modifying bike parking requirements to recognize the unique conditions across different zones and housing types.
- Modifying solid waste storage requirements to recognize current solid waste needs and to recognize the unique conditions across different zones and housing types.
- Modifying tree and landscaping requirements to increase tree canopy in Neighborhood Residential zones.
- Modifying ~~building code~~ regulations to support development of attached and stacked flat units.
- Implementing or modifying Mandatory Housing Affordability (MHA) requirements.
- ~~Updating tenant relocation assistance requirements to increase support for relocated households.~~
- ~~Updating our transportation concurrency requirements to reflect changes to the level-of-service standard.~~
- Changes to support electric vehicle charging when parking is provided.

Changes to the Comprehensive Plan ~~could~~ also implement changes required by state legislation including HB 1110, which requires cities to allow a minimum number of housing units on certain lots and restricts design review and development standards for middle housing, as well as SB 5412, which updates SEPA categorical exemptions and requires certain environmental analysis. See **Appendix C** for a list of codes acting as mitigation which can address SB 5412 provisions as well as allowances for raising SEPA thresholds per WAC 197-11-800(1)(c).

See **Appendix J** for proposed legislation considered in the conceptual blocks and urban form analysis in **Section 3.6 Land Use Patterns & Urban Form**.

130th/145th Station Area

This EIS also provides a focused review of potential land use and zoning changes to implement the 130th and 145th Street Station Area Plan and options for the City to streamline future environmental review in that area, which may include a planned action (RCW 43.21c.440), infill exemption (RCW 43.21C.229), or other tools available under state legislation (e.g., SB 5818).

Alternative land use concepts have been paired up with citywide alternatives for review in the EIS. **Exhibit 1.4-11** summarizes the land use concepts under ~~the~~ Alternative 1, No Action and the ~~two~~ three alternatives that have a more detailed approach in the 130th/145th Station Area.

- Alternative 1 retains the current Comprehensive Plan and zoning designations. No new areas would be designated for mixed-use or higher density and building types outside existing commercial zoning would remain primarily single purpose with some 4-8 story multi-family uses near the 145th BRT station.
- Compared to Alternative 1, Alternative 2 would have more mixed-use development in three new neighborhood centers—one near the 145th Station Area, one immediately to the east of I-5 and one around an existing business district (referred to as the Pinehurst Neighborhood Center). Most of the housing proposed under Alternative 2 would be near the 145th Station

Area and job growth would be modest. The neighborhood centers would contain a mix of Low-rise Residential, Midrise Residential, and Neighborhood Commercial 3 (NC3) zoning.

- Under Alternatives 3 and 4, changes in the 130th/145th station areas would be consistent with the changes described citywide.
- Under Alternative 5 and the Preferred Alternative, an urban center would be created straddling the west and east sides of I-5 at the Sound Transit light rail station at 130th with Low-rise Residential, Midrise Multifamily, and Neighborhood Commercial (2 and 3) zoning. The 130th Station Area would see the greatest increase in housing and job growth under Alternative 5 and the Preferred Alternative. Similar to Alternative 2, the 145th Station Area would be designated as a neighborhood center under Alternative 5 and the Preferred Alternative with similar zoning and housing growth and slightly fewer jobs.

Exhibit 1.4-11. Summary of Alternatives—130th/145th Station Areas

Feature	Alternative 1: No Action (aligns with citywide Alt 1)*	Alternative 2: Focused (aligns with citywide Alt 2)*	Alternative 5: Combined (aligns with citywide Alt 5)*	Preferred Alternative
Amount** and Pattern of Growth	Baseline growth and pattern. Growth in housing units: 840 Growth in jobs: 716	Cluster growth in newly designated small mixed-use node(s) and near transit. Growth in housing units: 2,208 Growth in jobs: 979	Potential new urban center and corridor designations. Residential areas growth. Growth in housing units: 2,703 Growth in jobs: 1,004	Similar to Alt 5. Growth in housing units: 2,152 Growth in jobs: 658
Building Types for New Construction	No change (single family, accessory dwelling units, limited multifamily and mixed use).	Denser and taller buildings in nodes. More mixed-use buildings.	Denser than Alt 2 with more mixed-use buildings and more home type variety.	Similar to Alt 5.
Building Heights for New Construction	No change Multifamily and mixed use: 45–80 ft Neighborhood Residential zones: 30 ft	Nodes: Potentially up to 40–80 ft Neighborhood Residential zones: 30 ft	Urban center: 95 ft Neighborhood Center~~Corridors~~: Potentially up to 40-80 ft Urban Neighborhood Residential zones: 30 ft	Urban Center: 85 ft Neighborhood Center: 40-75 feet Urban Neighborhood: 32 feet
Retail and Commercial	No change	Could include more retail and commercial locations than Alt 1.	More retail and commercial locations than Alt 2.	Similar to Alt 5.

Note: The Preferred Alternative was added to this exhibit since the Draft EIS—a minor correction made to Alternative~~s~~ 5 is shown in tracks.

* Alternative 1, No Action, would retain the City's Seattle 2035 urban village strategy and center/village designations—the existing urban centers and villages are categorized here according to the new place types proposed under Alternatives 2-5 and the Preferred Alternative for comparison purposes only. See **Exhibit 2.1-1** in **Chapter 2** for a crosswalk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~A~~lternatives ~~2-5~~.

** The growth estimates consider the current zoning within a common maximum boundary (Alternative 5 and the Preferred Alternative). The 130th Street and Pinehurst Neighborhood Center from Alternative 2 are both within the 130th Street Urban Center boundary in Alternative 5 and the Preferred Alternative.

Sources: City of Seattle, 2024~~3~~; BERK, 2024~~3~~.

Source: City of Seattle 130th and 145th Station Area Planning Multimodal Mobility Study, December 2020.

In addition to establishing future land use and zoning designations supporting the station area, the City's Station Area Plan provides direction on key policy issues:

- Land Use/Housing
  - Provide more density/diversity of land uses concurrent with transit.
  - Provide more housing choice.
  - Offer affordable housing options near light rail and Bus Rapid Transit (BRT).
  - Mitigate displacement of current residents and businesses
- Amenities/Public Realm
  - Coordinate update of street types in Streets Illustrated.
  - Establish a strong visual identity for the station areas, including architecture, landscape design, public art, and other public realm improvements as well as neighborhood wayfinding.
  - Provide amenities to support anticipated growth.
  - Retain tree canopy and healthy open spaces/environment.
- Access
  - Provide non-motorized access to the stations (safe etc.).
  - Coordinate with WSDOT, Sound Transit, and City of Shoreline.
  - Address parking regulations.

1.5 Key Issues & Options

The key issues facing decision makers include:

- Creation of a growth concept that meets objectives of the plan to create an equitable, livable, inclusive, and climate resilient community. The growth concept would offer greater housing choices across the city and an improved job-housing balance. It links to investments in transit and non-motorized improvements.
- Approval of a Comprehensive Plan including goals and policies that fulfill Seattle's vision and meet state and regional requirements.
- Approval of development regulations that implement the Comprehensive Plan goals, policies, and land use plan, resulting in quality urban design, and integrating the best available science to protect critical areas.
- Approval of SEPA facilitation tools to help incentivize growth while mitigating impacts for the 130th/145th Station area and other areas of the community.

1.6 Summary of Impacts & Mitigation Measures

Environmental Impacts

This section provides a summary of each environmental topic addressed in this EIS. This includes:

- Earth & Water Quality
- Air Quality/GHG
- Plants & Animals
- Energy & Natural Resources
- Noise
- Land Use Patterns
- Historic Resources
- Population, Employment, & Housing
- Transportation
- Public Services & Utilities

For the full context of the affected environment, potential impacts, and mitigation measures please see **Chapter 3**.

Equity & Climate Considerations

The City is seeking to develop a Comprehensive Plan that results in more equitable outcomes, reduces harms, and supports community-wide benefits created by growth and investment.

The Growth Management Act (GMA) now requires each county and city give special consideration to achieving environmental justice in its goals and policies, including efforts to avoid creating or worsening environmental health disparities.

> *"Environmental justice" means the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to development, implementation, and enforcement of environmental laws, regulations, and policies. Environmental justice includes addressing disproportionate environmental and health impacts in all laws, rules, and policies with environmental impacts by prioritizing vulnerable populations and overburdened communities and the equitable distribution of resources and benefits.*

GMA requires a series of elements including land use, housing, transportation, utilities, capital facilities, parks and recreation, economic development and recently, climate change and resiliency. The Comprehensive Plan provides policies that are considered in the exercise of the City's authority under SEPA; see Seattle's SEPA Policies at SMC 25.05.665.

As part of the scoping process in Fall 2022, the City identified climate and equity metrics that were to be addressed in the EIS analysis. In addition, for each environmental topic thresholds and metrics were developed to address the elements of the environment proposed during EIS scoping including those identified in WAC 197-11-444 and WAC 197-11-960.

For each environmental topic this summary describes an analysis of equity and climate performance criteria associated with that topic.

1.6.1 Earth & Water Quality

Source: City of Seattle, 2023.

How did we analyze Earth & Water Quality?

The EIS team reviewed documents and maps identifying critical areas, surface water, shorelines, groundwater, sea level rise, and environmental health. Thresholds of significance utilized in this impact analysis include:

- Runoff Increases: Impervious surface expansions that would increase runoff flow volumes and durations to streams by magnitudes resulting in bank scour and erosion;
- Surface Water Quality: Increases in amount of pollution to receiving waters that would impair their designated uses (such as human contact and fish habitat);
- Groundwater Quality: Impervious surface expansions that would decrease groundwater recharge beyond designated limits and increases in amount of pollution discharged to levels that would contaminate groundwater supplies.
- Environmental Earth and Soil Hazards: Disturbances of existing contaminated areas to levels that could endanger human health or the environment.
- Climate Change—Extreme Precipitation: Growth concentrated into areas that are reasonably expected to be at risk for future flooding and landslides.
- Climate Change—Sea-level Rise: Growth concentrated into areas that are reasonably expected to be at risk for future sea-level rise.

What impacts did we identify?

Every alternative would increase density in the city boundary and likely result in increased vehicle use, increased hard surfaces, and focus additional development closer to water resources. However, the redevelopment associated with each plan alternative would comply with City codes requiring stormwater management, critical area protections, building upgrades, and other measures to avoid or minimize potential impacts to earth and water resources.

Direct: Direct impacts relate to the development that could be allowed by each alternative over the 20-year planning period.

- Construction impacts—Construction activities can involve removal of vegetation and soil disturbance, causing erosion, water quality impacts, and potential for soil contamination. Construction activities and associated rainfall runoff controls are required to meet permitting requirements that should prevent or minimize adverse impacts.
- Vehicle Use—All of the plan alternatives would result in increased vehicle use. Higher numbers of vehicle trips can potentially increase contamination of local receiving waters, depending on the level of stormwater runoff treatment provided to the roadways.
- Hard Surfaces—All of the plan alternatives would result in an increase in the amount of hard surface (i.e., parking, buildings, etc.) in the city. The amount of hard surface versus vegetation in each place type impacts the way rainwater runoff mixes with potential pollution and soaks into the earth or is transported to natural receiving waters.

Indirect: Indirect impacts potentially occur as a result of the proposed action and are reasonably foreseeable, but they occur later in time or farther removed in distance. Indirect impacts on earth and water resources generally come from each alternative's potential indirect changes to pollutant sources and land cover through changes to the pattern and locations of population density and growth rate. As outlined in Vision 2050 (PSRC, 2020), focusing growth in previously developed urban areas will result in less impact on regional earth and water resources than focusing the same growth in previously undeveloped areas outside of cities that add new impervious surfaces controlled under current standards. Overall, the indirect effect from every alternative is considered beneficial to earth and water resources in the region that includes the city and areas beyond.

What is different between the Alternatives?

Citywide

As discussed in the previous section, increases in vehicle use and hard surfaces may result in direct impacts to earth and water resources by potentially increasing pollution and stormwater runoff, respectively. **Exhibit 1.6-1** summarizes these characteristics for each plan alternative. Expected changes to single-occupancy vehicle trips that are used as an indicator of potential increased pollution from vehicles~~. Increases in single-occupancy vehicle trips are presented in **Exhibit 1.6-1**, which is~~ are based on data from **Section 3.10 Transportation**. ~~Alternative 1 has~~

~~the lowest studied housing units and Alternative 5 the most, with Alternatives 2-4 moderate in growth. Thus, the potential for pollution due to single-occupancy vehicle trips matches this range. Factors that are used as gauges of i~~Increased hard surfaces ~~are summarized in **Exhibit 1.6-1** and include~~are based on number of housing units and distribution of ~~housing~~ development (new housing development ~~is assumed to create more hard surfaces when it~~ that is spread widely ~~into~~ across areas like Neighborhood Residential rather than concentrated into centers is assumed to create more hard surfaces). Additional considerations of changes in land cover, including changes in vegetation, are discussed in **Section 3.3 Plants & Animals**.

Exhibit 1.6-1. Impacts Based on Expected Pollution and Runoff Increases

Metric	Alt. 1	Alt.2	Alt.3	Alt.4	Alt.5	Pref. Alt.
Pollution Indicator: Daily Single-Occupancy Vehicle Trips (millions)	1.78	1.85	1.85	1.85	**1.91**	**1.89**
Hard Surface Indicator: Housing Units	80,000	100,000	100,000	100,000	**120,000**	**120,000**
Hard Surface Indicator: ~~Share~~ Distribution of Development~~able Acres~~						
Existing Centers* (continued development with no place type change)	~~58~~57%	58%	58%	58%	58%	36%
Plan Additions: Centers & Corridors** (hard surfaces are expected increase in these areas)	0%	6%	0%	15%	**20%**	**24%**
Neighborhood Residential** (hard surfaces are expected increase in these areas)	0%	0%	**29%**	0%	13%	**40%**
Outside Subareas*** (continued development with no place type change)	42%	36%	13%	27%	9%	0%****
Impact of Alternative Compared to No Action	**Baseline**	**Lowest Impact**	**~~Highest~~ High Impact**	**Moderate Impact**	**~~Highest~~ Higher Impact**	**Highest Impact**

Note: The Preferred Alternative was added to this exhibit since the Draft EIS—edits made to the row headings and Alternatives 1–5 are shown in tracks.
* "Existing Centers" are shown to clarify that these areas present in the Baseline will also be present in each plan alternative. They are not a differentiator between the baseline and plan alternatives.
** "Plan Additions: Centers and Corridors" and "Neighborhood Residential" are new elements that are part of the plan alternatives and are included in the impacts analysis.
*** "Outside Subareas" include~~s~~ all areas outside the other listed geographies and are typically parks, major institutions, and some residential areas. Alternatives 1-5 would not ~~No~~ change the ~~to~~ place type in ~~is proposed in~~ these areas, though growth in the residential areas ~~will~~ would continue ~~to occur~~ under current zoning throughout the 20-year planning period. See also note ****.
**** See **Exhibit 2.4-26**. Under the Preferred Alternative, the same 3,854 acres of "Outside Subareas" as Alternatives 1-5 are technically classified as new place type—neighborhood center, urban neighborhood, or frequent transit corridor place types. This includes areas where residential development will not occur, such as parks and major institutions. The potential for and extent of development in these areas under the Preferred Alternative would be similar to Alternatives 1-5 as no substantial shift is expected from currently allowed development patterns.
Source: City of Seattle, 2024~~3~~; Parametrix, 2024; BERK, 2024~~3~~.

Equity & Climate Vulnerability Considerations

Several areas of the city rank high (in the upper half of the scoring range) for environmental health disparities. Redevelopment in these areas associated with the plan alternative could have both beneficial and detrimental impacts to the population in these areas, as follows:

- Exposure to Contaminated Sites: In areas with environmental health disparities, redevelopment allowed by the studied alternatives could have both beneficial and detrimental impacts to the population in these areas. Redevelopment can sometimes pose a risk of exposure from contaminated sites or motivate additional clean-up and protection, depending on the scale of the project. The City regulates development around known contaminated sites.
- Water Quality: Redevelopment often triggers requirements to upgrade stormwater management to meet current standards, which can either avoid impacts or result in a benefit to earth and water resources, and in turn to those living in the surrounding community. Alternative 1 would have the least potential for equitable investments in stormwater quality improvements with the level of housing units compared to Alternative 5 and the Preferred Alternative with the most and Alternatives 2 to 4 moderate potential. However, each of the plan alternatives could have increased environmental impacts where development density is focused in closer proximity to water resources.
- Flooding and Landslides: Where redevelopment would trigger installation of newer stormwater infrastructure as described above, that infrastructure can be designed to be more resilient to changes in rainfall frequencies and volumes, thereby lowering the flood risks for the community. While Alternative 1 retains current plans and regulations, the action alternatives advance the City's climate resilience with a new climate element based on a climate vulnerability assessment.
- Sea-Level Rise: Areas currently at risk for sea level rise are in Area 7 along the Duwamish River. There is a potential for sea level rise and storm surge risks elsewhere in Areas 1, 3, 4, and 6. Alternative 1 tends to have less growth in these areas and Alternative 5 and the Preferred Alternative the most. In Area 3, the growth under Alternative 2 would be similar to Alternative 5 and the Preferred Alternative. However, action alternatives would include a new climate element required under the Growth Management Act (GMA) and climate resilience strategies to direct growth away from shorelines.

130th/145th Station Area

The 130th/145th Station Area is in close proximity to Thornton Creek, and runoff from these areas is in the associated regulated stream basin.

- Alternative 1, No Action, would have the lowest potential land cover conversions of vegetation to hard surface, the lowest expected increase in daily vehicle trips, and would focus increased density farther away from water resources than all other alternatives.
- Alternative 2 would have neighborhood center development in the station area. Alternative 2 would have the least potential land cover conversions of vegetation to hard surface, the lowest expected increase in daily vehicle trips, and would focus increased density farther

away from water resources than all other action alternatives. Alternative 2 presents the lowest potential for direct impacts on earth and water resources within the 130th/145th Station Area among the action alternatives.

- In Alternative 5 and the Preferred Alternative, the 130th/145th Station Area would specifically include areas to be reclassified as an urban center and would have relatively higher potential land cover conversions of vegetation to hard surface, the highest expected increase in daily vehicle trips, and would focus the highest amount of increased density closer to water resources than all other action alternatives.

What are some solutions or mitigation for impacts?

The Comprehensive Plan includes policies relevant to the city-wide protection and restoration of earth and water resources. Action alternatives would amend all elements as part of the Periodic Update; this includes similar and improved policies addressing earth and water resources particularly related to climate resilience.

In addition to new Comprehensive Plan policies under action alternatives and existing codes and regulations addressing critical areas and stormwater, and emergency preparedness, the City could consider:

- Continued implementation of SDOT policy to avoid adding or expanding roadways through transit and other approaches.
- Strengthen critical areas ordinances and restore critical area buffers.
- Update the Shoreline Master Program to increase sea-level rise resiliency actions (such as construction of barriers or property acquisitions) by basing boundaries and elevation restrictions on the Mean Higher High Water Mark (the average of the higher daily tides) or some other metric higher than the Ordinary High Water Mark.
- Install updated stormwater controls on roadways, which are not likely to be upgraded as part of the parcel redevelopments included in the alternatives.
- Continue research and implementation of innovative stormwater best management practices, especially those focused water quality treatment in the most urban areas.
- Implement the Puget Sound Partnership Action Agenda and Water Resource Inventory Area Salmon Recovery/Habitat Protection plans.
- Continue to implement PSRC's Four-Part Strategy to reduce greenhouse gas emissions.
- Implement the One Seattle Climate & Environment Element, address climate resilience based on City studies, update the Climate Action Plan.
- Address hazard mitigation planning and associated regulations.

With mitigation, what is the ultimate outcome?

Land cover across most of the city has been extensively modified for over a century by development, which has already resulted in long-term impacts to earth and water resources. Redevelopment of these areas associated with every ~~project~~ alternative would be required to install permanent stormwater management systems to mitigate potential impacts from changes to the site runoff. These required stormwater management measures are designed to minimize pollution at the source; remove or reduce the amounts of pollutants in the stormwater before it enters the receiving water; or manage the rate at which stormwater flows into a receiving water, the separated storm conveyance system, or the combined sewer system. Furthermore, the comprehensive future planning associated with the ~~project~~ alternatives that would focus growth in the city's already developed area as opposed to allowing that same growth to impact more rural, undeveloped areas is also expected to be beneficial to earth and water resources. Therefore, no significant unavoidable adverse impacts to earth and water resources are expected.

Summary of Thresholds

Exhibit 1.6-2 summarizes the results of the evaluation of potential impacts based on the evaluation in **Section 3.1 Earth & Water Quality**.

Exhibit 1.6-2. Earth & Water Quality Summary of Thresholds of Significance

Metric	Threshold	Alt. 1	Alt. 2	Alt. 3	Alt. 4	Alt. 5	Pref.
	Surface Water Quality: Impervious surface expansions; and increases in amount of pollution.[1]	▽	▽	▼	▽	▼	▼
	Groundwater Quality: Impervious surface expansions that would decrease groundwater recharge and increases in amount of pollution discharged.[1]	▽	▽	▼	▽	▼	▼
☒ Equity & Climate	Environmental Earth and Soil Hazards: Disturbances of existing contaminated areas to levels that could endanger human health or the environment.[2]	▽	▽	▽	▽	▽	▽
☒ Equity & Climate	Climate Change—Extreme Precipitation: Growth focused into areas that are reasonably expected to be at risk for future flooding and landslides.[3]	▼	▽	▽	▽	▽	▽
☒ Equity & Climate	Climate Change—Sea-level Rise: Growth focused into areas that are reasonably expected to be at risk for future sea-level rise.[4]	▼	▽	▽	▽	▽	▽

Note: Impacts are considered either unavoidable adverse (▼▼), adverse but able to be mitigated (▼), impact but less than adverse (▽), limited or none (—), moderately positive (△), or positive (▲). The Preferred Alternative was added to this exhibit, and associated analysis in the notes, since the Draft EIS—no changes were made to the impact summary for Alternatives 1–5.

1 All alternatives would increase hard surfaces (i.e., parking, buildings, etc., known as impervious surfaces). Each alternative allows development density in closer proximity to water resources. Alternatives 3 and 5 and the Preferred Alternative could result in more impervious areas and less tree canopy than other alternatives. Alternative 5 could result in more pollution due to higher growth and vehicle trips than other alternatives. Considering the pattern of density of the alternatives illustrated in **Exhibit 3.1-14** to **Exhibit 3.1-16** in **Section**

3.1.2, Alternative 1 would have the lowest level of redevelopment compared to Alternative 5 and the Preferred Alternative with the most and Alternatives 2 to 4 with medium amounts. Seattle Stormwater Manual requirements would apply and are shown in Exhibit 3.1-17.
2 Redevelopment can sometimes pose a risk of exposure from contaminated sites or motivate additional clean-up and protection, depending on project scale. The City regulates development around known contaminated sites.
3 Where redevelopment would trigger installation of newer stormwater infrastructure, it can be designed to be more resilient to changes in rainfall frequencies and volumes. Alternative 1 retains current plans and regulations, action alternatives including the Preferred Alternative advance the climate resilience policies and strategies.
4 Current codes are based on current water surface elevation metrics and may not fully address resiliency to potential impacts from forecasted sea-level rise. Alternative 5 and the Preferred Alternative could result in exposure of more people to sea level rise. Compared to Alternative 1, the action alternatives would potentially have less risk of sea level rise exposure to communities because of new climate element and resilience strategies and direct growth away from shorelines.

1.6.2 Air Quality & GHG Emissions

How did we analyze Air Quality & GHG Emissions?

The EIS evaluates the air quality impacts of implementing the alternatives and focuses on two criteria air pollutants: carbon monoxide (CO) and particulate matter (PM) resulting from changes in land uses and transportation patterns. It also considers other criteria air pollutants such as ozone precursors (reactive organic gases, ROGs, and oxides of nitrogen, NOx) and Toxic Air Pollutants (TAPs).

The project team collected data from the following sources to support analysis of existing air quality conditions and potential effects of the ~~project~~ alternatives:

- U.S. Environmental Protection Agency Greenbook (EPA, 2021)
- Puget Sound Clean Air Agency (PSCAA) and Ecology Air Monitoring Network
- 2016-2021 PSCAA Air Quality Data Summaries (PSCAA)
- 2020 Community Greenhouse Gas Emissions Inventory (Seattle, 2022)
- Washington Department of Ecology Air Quality Standards and Greenhouse Gas Emissions Inventory (Ecology, 2022a and 2022b)

Mobile emissions were estimated using the EPA's Motor Vehicle Emission Simulator (MOVES) model.

The thresholds of significance utilized in this impact analysis include:

- Air Pollution: Growth concentrated in areas with high exposure to air pollution.
- Per Capita GHG emissions: Increase in GHG emissions on a per capita basis.
- Consistency with other efforts: Actions would prevent or deter statewide, regional, or local efforts to reduce GHG emissions.

What impacts did we identify?

Construction: Future growth under any alternative would result in development of new residential, retail, light industrial, office, and community/art space and associated emissions

generated during construction activities would include exhaust emissions from heavy duty construction equipment, trucks used to haul construction materials to and from sites, worker vehicle emissions, as well as fugitive dust emissions associated with earth-disturbing activities, and other demolition and construction work. Criteria air pollutants would be emitted during construction activities from demolition and construction equipment, much of it diesel-powered, trucks used to haul construction materials to and from sites, and from vehicle emissions generated during worker travel to and from construction sites.

Construction-related GHG emissions from any given development project that may occur in the next 20 years would be temporary and would not represent an on-going burden to the City's inventory. However, cumulatively it can be assumed that varying levels of construction activities within the city would be ongoing under any of the plan alternatives and hence, cumulative construction related emissions would be more than a negligible contributor to GHG emissions within the city.

Transportation: All action alternatives result in roughly the same annual GHG emissions. The variation is within approximately one half of one percent. This is because the projected improvements in fuel economy outweigh the projected increase in VMT. Therefore, roadway emissions are considered a minor adverse impact.

What is different between the Alternatives?

Citywide

GHG emissions would differ among the alternatives with the lowest total emissions under Alternative 1 and the most under the Preferred Alternative ~~5~~. Alternatives 2, 3, and 4 have the same growth. On a per capita basis, Alternative 1 would have the most and Alternative 5 would have the least. The Preferred Alternative is lower than Alternatives 2 through 4 and similar to but slightly higher than Alternative 5. See **Exhibit 1.6-3**.

Exhibit 1.6-3. GHG Emissions ($MTCO_2e$) by Alternative and Per Capita Rate

	Alt. 1	Alt. 2	Alt. 3	Alt. 4	Alt. 5	Pref. Alt.
Transportation	-1,662	-834	-835	-835	176	294
Buildings	372,474 ~~48,422~~	388,378 ~~50,489~~	391,736 ~~50,926~~	389,644 ~~50,654~~	406,041 ~~52,785~~	415,152
Waste	60,834	64,053	64,294	64,294	67,917	69,683
Total Emissions	**431,647** ~~107,594~~	**451,597** ~~113,708~~	**455,196** ~~114,385~~	**453,104** ~~114,113~~	**474,134** ~~120,878~~	**485,128**
Population Growth Estimate	164,000	205,000	205,000	205,000	246,000	246,000
Per Capita GHG Emissions	**2.63** ~~0.66~~	**2.20** ~~0.55~~	**2.22** ~~0.56~~	**2.21** ~~0.56~~	**1.93** ~~0.49~~	**1.97**

Notes: Population growth calculated using City GIS data for total housing units and population (total units/population = persons per household), assuming 2.05 persons per household. The Preferred Alternative was added to this exhibit since the Draft EIS—edits made to Alternatives 1–5 are shown in tracks.
Source: Kimley-Horn, 2025. ~~3~~

Source: City of Seattle, 2023.

Equity & Climate Vulnerability Considerations

Portions of Seattle located along major roadways (freeways and the most-traveled highways) are exposed to relatively high levels of air borne toxics, resulting in high cancer risk values. Risks and hazards drop dramatically in places farther than 200 meters (656 feet) from the center of highways; for the EIS, a buffer area of 500 to 1,000 feet has been considered from roads with daily trips greater than 100,000 vehicles to identify potential exposure of sensitive populations to air toxics; this includes Interstate 5 north of Interstate 90. Within the "buffer" study area, the potential for dwelling units is described for each alternative:

- Under Alternatives 1, 3, and 4, the number of dwelling units within the portion of urban centers and villages in the 1,000-foot buffer area would be the lowest.
- Alternative 2 would place a greater number of dwelling units within the 1,000-foot buffer when compared to Alternative 1, 3, and 4, but fewer units compared to Alternative 5 and the Preferred Alternative.
- The Preferred Alternative ~~5~~ would place the greatest number of dwelling units within the 1,000-foot buffer when compared to the other Alternatives. Alternative 5 would place a greater number of units within the 1,000-foot buffer when compared to Alternatives 1 through 4 but less within the 1,000-foot buffer when compared to the Preferred Alternative.

130th/145th Station Area

Zoning designations under **Alternative 1** would be retained within the 130th/145th Station Area and no new areas will be designated for mixed-use or higher density than exists under existing conditions. Implementation of Alternative 1 assumes a growth potential of 840 housing units and 716 jobs in proximity to the future light rail and BRT stations.

- **Construction:** Station Area growth under Alternative 1 would be the lowest compared to all other alternatives. Therefore, emissions associated with heavy-duty construction equipment, trucks, worker vehicles, and fugitive dust would likely be the lowest among all alternatives.
- **Operations—Criteria Pollutants:** Transit has been identified as the most frequent and successful tool in reducing VMT (WSDOT, 2022). Transit improvements overall provide a VMT reduction of up to 2.6% (WSDOT, 2022). Therefore, transit service and connectivity provided by the future light rail and BRT stations in combination with Alternative 1 growth potential, in comparison to baseline conditions, would result in improved transit service and connectivity when compared to existing conditions, providing greater potential for VMT reduction and reductions in criteria pollutants.
- **Operations—Greenhouse Gas Emissions:** Transit service and connectivity provided by the future light rail and BRT stations in combination with Alternative 1 growth potential, in comparison to baseline conditions, would result in improved transit service and connectivity when compared to existing conditions, providing greater potential for VMT reduction and reductions in GHG emissions. The housing growth potential under Alternative 1 would be the lowest compared to all other alternatives. Therefore, GHG emissions associated with building energy use and solid waste would be lowest under Alternative 1.
- **Exposure to Pollution**: Several urban centers and urban villages are located within 1,000-feet of roadways with greater than 100,000 daily vehicles. Compared to all other alternatives, the number of units within the affected urban centers and villages would be the lowest. ~~Target growth under Alternative 2 within the Station Area would be greater than Alternative 1 and would place a greater number of residents in proximity to transportation-related pollutants along I-5. Compared to Alternative 5, Alternative 2 would place a fewer number of residents in proximity to transportation-related pollutants along I-5.~~

Implementation of **Alternative 2** assumes a growth potential of 2,208 housing units, which is greater than the growth potential of Alternative 1.

- **Construction:** Emissions associated with heavy-duty construction equipment, trucks, worker vehicles, and fugitive dust would likely be greater than Alternative 1 and less than Alternative 5 based on the ~~target~~ growth in dwelling units. Implementation of the Preferred Alternative assumes a growth level similar to Alternative 2, and, therefore emissions associated with heavy-duty construction equipment, trucks, worker vehicles, and fugitive dust would be similar to Alternative 2.
- **Operations—Criteria Pollutants:** Increased growth potential within neighborhood centers combined with improvements to transit service and connectivity, when compared with Alternative 1, would result in greater potential for VMT reduction and reductions in criteria pollutant emissions. The Preferred Alternative would have similar results as Alternative 2.

- **Operations—Greenhouse Gas Emissions:** As stated above, increased growth potential within neighborhood centers combined with improvements to transit service and connectivity, when compared with Alternative 1, would result in greater potential for VMT reduction, resulting in reductions in GHG emissions. However, ~~target~~ growth within the Station Area under Alternative 2 would be greater than Alternative 1, resulting in higher emissions related to building energy consumption and solid waste generation. Under the Preferred Alternative, Station Area growth would be similar to Alternative 2, likely resulting in similar emissions related to building energy consumption and solid waste generation (lower than Alternative 5).
- **Exposure to Pollution**: ~~Target g~~Growth under Alternative 2 within the Station Area would be greater than Alternative 1 and would place a greater number of residents in proximity to transportation-related pollutants along I-5. Compared to Alternative 5, Alternative 2, as well as the Preferred Alternative, would place a fewer number of residents in proximity to transportation-related pollutants along I-5.

Under **Alternative 5**, an urban center designation on both the west and east sides of the 130th Station Area would merge with an existing commercial node to expand residential mixed use near the station. Implementation of Alternative 5 assumes a growth potential of 2,703 housing units, which is greater than all other alternatives.

- **Construction:** Station Area growth under Alternative 5 would be the greatest compared to all other alternatives. Therefore, emissions associated with heavy-duty construction equipment, trucks, worker vehicles, and fugitive dust would likely be the highest among all alternatives.
- **Operations—Criteria Pollutants:** Increased growth potential within urban centers combined with improvements to transit service and connectivity provided by the stations, when compared with all the other alternatives, would result in greatest potential for VMT reduction and reductions in criteria pollutant emissions.
- **Operations—Greenhouse Gas Emissions:** As stated above, Station Area growth under Alternative 5 would result in the greatest potential for VMT reduction and reductions in transportation-related GHG emissions. However, Station Area growth would be the highest under Alternative 5, likely resulting in the highest emissions related to building energy consumption and solid waste generation.
- **Exposure to Pollution**: ~~Target g~~Growth under Alternative 5 within the Station Area would be the greatest compared to all other alternatives and would potentially place the greatest number of residents within close proximity to transportation-related pollutants along I-5.

The **Preferred Alternative**, like Alternative 5, includes an urban center designation on both the west and east sides of the 130th Station Area would merge with an existing commercial node to expand residential mixed use near the station. Implementation of the Preferred Alternative assumes a growth potential of 2,152 housing units, which is similar to Alternative 2. Under the Preferred Alternative, emissions associated with heavy-duty construction equipment, trucks, worker vehicles, and fugitive dust and emissions related to building energy consumption and solid waste generation would be similar to Alternative 2. Increased growth potential within urban centers combined with improvements to transit service and connectivity provided by the

stations associated with the Preferred Alternative would result in potential for per capita VMT reduction similar to Alternative 5, resulting in similar reductions in criteria pollutant emissions.

What are some solutions or mitigation for impacts?

In addition to current and proposed policies, including transportation, and a new climate element with the One Seattle Comprehensive Plan Update, the following mitigation measures are considered in **Section 3.2 Air Quality & GHG Emissions**.

- VMT Related: Pedestrian facilities, bicycle improvements, transit improvements, congestion pricing, roadway fees, and tolls, land use mix and compactness.
- Electric vehicles
- Residential strategies including tree canopy, street sweeping, appropriate location of truck routes, and zoning standards addressing location, building, and site design.
- Incorporate standards for more frequent street sweeping to reduce roadway dust associated with increased VMT on high-travelled roadways within 1,000 feet of residential uses.
- Development standards that require or incentivize enhanced air filtering and circulation to address transportation-generated particulates for residences and other sensitive uses.
- Consider zoning standards that identify location, building, and site design provisions that support reduced exposure to potential air toxics.

The 130th/145th Station Area measures would be similar and tailored to the station area:

- Incorporation of development standards including requirements for enhanced air filtration and circulation for residential units within the Station Area and site intake vents as far from substantial sources as practicable.
- Building design strategies to minimize the number of residential units facing I-5.
- Planting of trees along streets with residential development and along commercial corridors including but not limited to the reforestation plan for the Lynnwood Link Extension.
- Restrict open spaces such as balconies near the source of toxic air contaminants (e.g., I-5).
- Restrict operable windows near sources of toxic air contaminants.

With mitigation, what is the ultimate outcome?

No significant unavoidable adverse impacts to air quality and greenhouse gas emissions are anticipated. Through mitigation implementation, local and state climate actions, and expected continued regulatory changes, the alternatives may result in lower GHG emissions on a per capita basis compared to existing conditions. The alternatives would not prevent or deter statewide, regional, or local efforts to reduce GHG emissions. While each alternative would generate GHG emissions from growth and development within the city, the benefit of channeling development to targeted areas that might otherwise occur in peripheral areas of the city or region could serve to offset these impacts.

Summary of Thresholds

Exhibit 1.6-4 summarizes potential impacts based on the evaluation in **Section 3.2 Air Quality & GHG Emissions**.

Exhibit 1.6-4. Air Quality & GHG Emissions Thresholds of Significance

Metric	Threshold	Alt. 1	Alt. 2	Alt. 3	Alt. 4	Alt. 5	Pref.
☒ Equity & Climate	Air Pollution: Growth focused in areas with high exposure to air pollution.[1]	▽	▼	▽	▽	▼	▼
☒ Equity & Climate	Per Capita GHG emissions: Increase in GHG emissions on a per capita basis.[2]	△	△	△	△	△	△
☒ Equity & Climate	Consistency with other efforts: Actions would prevent or deter statewide, regional, or local efforts to reduce GHG emissions.[3]	—	—	—	—	—	—

Note: Impacts are considered either unavoidable adverse (▼▼), adverse but able to be mitigated (▼), impact but less than adverse (▽), limited or none (—), moderately positive (△), or positive (▲). The Preferred Alternative was added to this exhibit, and associated analysis in the notes, since the Draft EIS—no changes were made to the impact summary for Alternatives 1–5.

1 Air toxics and particulate matter risks and hazards are greatest near major highways and drop beyond approximately 656 feet from the center of highways. A buffer area of 500 to 1,000 feet has been considered to reduce the potential exposure of sensitive populations to air toxics. Under any alternative, increased residential densities could be expected within this buffer. Alternative 2 would place a greater number of units within the 1,000-foot buffer when compared to Alternative 1, 3, and 4, but fewer units compared to Alternative 5. Alternative 5 would place the greatest number of units within the 1,000-foot buffer when compared to the other alternatives. Growth under the Preferred Alternative within the Station Area would be similar to Alternative 2 and would potentially place a similar number of residents within close proximity to transportation-related pollutants along I-5 (less than Alternative 5).

2 According to the Seattle 2020 Community GHG Inventory, citywide core per capita emissions was 4.09 MTCO2e per resident in 2020. Alternative 1 would result in per capita emissions of 0.66 MTCO2e, which is significantly lower than the existing per capita rate. While Alternative 5 results in the highest overall housing growth (similar to the Preferred Alternative)~~and VMT~~, resulting in the second highest GHG emissions associated with transportation, building energy, and waste compared to the other alternatives, per capita emissions would be the lowest at 0.49. While the Preferred Alternative results in the same (and highest) overall housing growth as Alternative 5, the Preferred Alternative would result in greater transportation-related emissions due to the allocation and distribution of growth (resulting in higher VMT) and greater emissions associated with building energy and waste due to differing growth by housing types compared to Alternative 5. As such, per capita emissions under the Preferred Alternative would be slightly higher than Alternative 5 and lower than Alternatives 1 through 4. ~~Other action alternatives are in the range of Alternatives 1 and 5.~~

3 The alternatives would not prevent or deter statewide, regional, or local efforts to reduce GHG emissions. While each alternative would generate GHG emissions from growth and development within the city, the benefit of channeling development to targeted areas that might otherwise occur in peripheral areas of the city or region could serve to offset these impacts.

1.6.3 Plants & Animals

How did we analyze Plants & Animals?

Analyses in this EIS consider all plants and animals that may be affected by the alternatives, with particular emphasis on tree canopy cover and on streams that may receive stormwater runoff from pollution-generating impervious surfaces. This emphasis reflects heightened concern about those two elements of the environment. During the public scoping process, many stakeholders expressed concern about the loss of tree canopy cover in the city. With regard to stormwater, a growing field of research is finding that stormwater runoff contains contaminants that are harmful to fish, or terrestrial wildlife, including species that are listed as threatened or endangered under the Endangered Species Act (ESA).

Thresholds of significance utilized in this impact analysis include:

- Impacts that would reduce the likelihood ~~of survival or recovery of a plant or animal species in the wild~~ that populations of native plant or animal species would persist in or near Seattle, compared to the No Action alternative.
- A substantially increased potential for tree canopy cover loss, compared to the No Action Alternative.
- An appreciable increase in the delivery of stormwater contaminants to fish-bearing streams, compared to the No Action Alternative.

What impacts did we identify?

Reducing the amount of area dedicated to lower-density residential uses and increasing the amount of area available for conversion to higher-density uses would lead to an elevated risk of impacts to vegetation including loss of tree canopy ~~loss~~ on redeveloped parcels and in nearby road rights-of-way. In addition, for this Final EIS, analysts estimated the acreage of land that may be affected by residential development during the 20-year planning period. This analysis provides additional insights into the alternatives' potential impacts on vegetation.

What is different between the Alternatives?

Citywide

Plant and Animal Species: Under any of the alternatives, the potential for adverse effects on plants and animals would be avoided, minimized, documented, and mitigated ~~to the greatest extent possible~~ through regulatory reviews and permitting processes that apply to individual projects. None of the alternatives propose any modifications to those processes. The action alternatives would include policies to maintain and enhance tree canopy in rights of way and city property and to expand tree canopy throughout the community, prioritizing residential and mixed-use areas currently with the least ~~current~~ tree canopy. Implementation of these policies

could lead to beneficial effects for some species. Given that habitats in the city limits represent a very small proportion of the total amount of habitat available to any species, differences in the availability or distribution of habitats in the city would be unlikely to result in any appreciable impacts on ~~regional~~ populations of plants or animals in and near Seattle. Based on these considerations, none of the alternatives would be expected to result in impacts that would reduce the likelihood that populations of native plant or animal species would persist in or near Seattle~~of survival or recovery of a plant or animal species in the wild~~.

Runoff and Streams: Development or redevelopment projects may create or replace impervious surfaces, including some pollution-generating impervious surfaces. If runoff from these surfaces enters fish-bearing streams, contaminants in the runoff may harm or kill fish. Contaminants in runoff that enter surface waters may also be harmful to terrestrial wildlife. On-site stormwater management would likely be required for development or redevelopment projects within the city limits. Implementation of required stormwater management would occur under any of the alternatives and would prevent or minimize the delivery of contaminants to fish-bearing streams. This, in turn, would avoid or minimize the potential for adverse impacts on ~~aquatic species~~ fish, wildlife, and their habitats.

The locations, design, and performance standards of stormwater facility improvements would be determined on a project-by-project basis and cannot be predicted for a programmatic review such as this. For this analysis, it is assumed that the potential for stormwater contaminants to be delivered to streams would be proportional to the amount of area available for conversion to higher-density uses. This assumption is based on the reasoning that a greater amount of area available for redevelopment projects would translate into a greater potential that there may be some projects for which it is not possible to avoid adverse impacts on water quality altogether.

Source: City of Seattle, 2023.

Tree Canopy: As described in **Section 3.3.1**, between 2016 and 2021, tree canopy cover decreased in all management units except Downtown, where it remained essentially unchanged The greatest acreage of canopy loss—more than three-quarters of the total loss—occurred in the Parks and Natural Areas and Neighborhood Residential management units. Notably, most canopy loss was not associated with development activities; only 14% of the canopy loss occurred on parcels that underwent development during that period.

The potential for reductions in tree canopy cover would ~~be affected by~~ depend on the amount of area available for conversion to higher-density uses and the amount of area redeveloped for housing. A substantial portion of development-related reductions in canopy cover would be reversed over time as replacement trees grow, and the potential for any such reductions would be limited by regulations that protect existing trees and require replacement of trees that are removed from private parcels. It may take many years for the planted trees to gain sufficient canopy area and volume to replace the functions of the trees they replace. This loss would be offset over time by the growth and development of trees that have already been planted to replace trees removed for past development projects. Requirements for tree planting in road rights-of-way may create opportunities for additional tree canopy development in areas that currently lack street trees. Also, the action alternatives would include policies to maintain and enhance tree canopy.

Based on the amount of area available for conversion to higher-density uses, as well as the estimated acreage of land that may be affected by residential development projects during the 20-year planning period, Alternative 1, No Action would have the lowest potential for development-related reductions in tree canopy cover. Among the action alternatives, Alternative 2 would have the lowest potential for reductions in tree canopy cover; this alternative focuses growth in neighborhood centers. Alternative 4 would have a moderate potential for reducing tree canopy cover. Alternative 3 would have a higher potential ~~for reduction in tree canopy cover~~ as it would be expected to allow for residential development at higher densities in the Neighborhood Residential zones. Based on the expectation that tree canopy cover in such areas is greater than in areas where high-density development is already present, Alternative 3 may have a higher potential for vegetation impacts—including loss of tree canopy—compared to the other action alternatives.

Compared to Alternative 3 and the Preferred Alternative, Alternative 5 would direct less housing growth to areas currently dominated by low-density residential development. As a result, Alternative 5 may have a lower potential for vegetation impacts—including loss of tree canopy—compared to those two alternatives. Based on this criterion, the Preferred Alternative may have a lower potential for vegetation impacts than Alternative 3 but a higher potential than the other action alternatives. ~~Given the highest number of homes produced and the broadest range of areas affected, Alternative 5 would tend to have the highest potential for loss of tree canopy.~~

See additional analysis of effects of alternatives on vegetation, including tree canopy, in **Section 3.3.2** and **Appendix G**.

Encouraging residential and commercial development within the urban environment of Seattle could indirectly benefit plants and animals by easing development pressure in less-developed areas outside the city.

Equity & Climate Vulnerability Considerations

Areas with disadvantaged populations tend to have less canopy cover than other areas. Generally, these areas also lost more canopy cover during the 5-year study period of the City's tree canopy assessment. Alternatives that concentrate growth in areas where extensive multifamily development is already present may have a higher likelihood of contributing to canopy cover loss in areas with disadvantaged populations. The risk of adverse impacts on disadvantaged populations would be partially offset by several factors, such as increased availability of lower-cost housing options in areas with higher canopy cover and access to large parks.

Trees play a vital role in moderating temperatures in urban areas. In general, areas with more canopy cover have cooler temperatures, compared to areas with less canopy cover. Increasing canopy in low-canopy neighborhoods is a critical aspect of the City's long-term heat preparedness strategy (Seattle Office of Sustainability & Environment 2022). Alternatives with a higher likelihood of contributing to canopy cover loss in areas with low canopy cover would have an elevated risk of exacerbating local heat impacts.

Compared to the action alternatives, Alternative 1 would result in less growth in the city overall but would tend to focus that growth in areas where extensive multifamily development is already present. As a result, Alternative 1 would have a moderate risk of contributing to adverse effects on disadvantaged populations or exacerbating climate vulnerability compared to the action alternatives. Among the action alternatives, Alternative 3 would have the lowest likelihood of contributing to such effects; this alternative would minimize the amount of growth in areas where extensive multifamily development is already present. Alternative 2 would focus growth in a limited number of neighborhood centers, where extensive multifamily development is already present. As a result, the likelihood of contributing to adverse effects on disadvantaged populations or exacerbating climate vulnerability would be higher than under Alternative 3. Alternative 4 would likely have a level of impact for this topic that is between Alternatives 2 and 3.

Alternative 5 would include the most housing units overall spread across a wide range of areas including neighborhood centers, corridors, and neighborhood residential areas. Consequently, ~~the higher level of new homes~~ Alternative 5 ~~c~~would ~~result in~~ have a higher likelihood of contributing to canopy cover changes that adversely affect disadvantaged populations or exacerbate climate vulnerability, compared to ~~the other action a~~Alternatives 1 through 4. The Preferred Alternative, like Alternative 5, would add more new housing units than Alternatives 1 through 4, including in areas where extensive multifamily development is already present. However, similar to Alternative 3, a substantial portion of the area potentially affected by residential projects would be in the Neighborhood Residential place type, where existing levels of multifamily development are comparatively low. Based on a comparison of the estimated

amount of area affected by residential projects in areas where extensive multifamily development is already present, the Preferred Alternative would have a lower risk than Alternative 5 of contributing to adverse effects on disadvantaged populations or exacerbating climate vulnerability, and a higher risk than Alternatives 1 through 4.

130th/145th Station Area

Alternative 1: No areas with relatively high canopy cover are found in areas that would continue to be designated as urban centers or urban villages in the 130th/145th Station Area under Alternative 1. No areas currently zoned primarily for single-family residential uses in the 130th/145th Station Area would be converted to higher-density designations under Alternative 1. As such, Alternative 1 would have a lower potential of leading to increased delivery of stormwater contaminants to streams in this area, compared to the other alternatives.

Alternative 2: All three of the neighborhood centers that would be established in the 130th/145th Station Area under Alternative 2 would partially overlap areas with moderately high canopy cover. Approximately 117 acres in the 130th/145th Station Area (52 acres in the NE 130th Street unit and the full 65-acre area of the NE 145th Street unit) would be designated as neighborhood centers. Areas that are currently zoned primarily for single-family residential uses and that would be converted to higher-density designations under Alternative 2 make up approximately one-half of the 117-acre area that would be designated as neighborhood centers. As such, Alternative 2 would have a higher potential than Alternative 1 of leading to increased delivery of stormwater contaminants to streams in this Area 1, but a lower potential than the other action alternatives.

Alternative 5: Alternative 5 would convert approximately 200 acres of parcels that are currently zoned primarily for single-family residential uses to higher-density designations. These areas would partially overlap areas with moderately high canopy cover. However, the housing target for these areas would be higher than under any of the other alternatives. As a result, more redevelopment projects would be expected to occur in these areas under Alternative 5 than under the other alternatives, and Alternative 5 would thus have a higher potential of leading to increased delivery of stormwater contaminants to streams in this area, compared to the other alternatives.

Preferred Alternative: Similar to Alternative 5, the Preferred Alternative would convert approximately 200 acres of parcels that are currently zoned primarily for Neighborhood Residential (formerly single-family residential) uses to higher-density designations. However, compared to Alternative 5, fewer new housing units would be added in this area. As a result, the Preferred Alternative's potential for contributing to tree loss in areas with relatively high proportions of existing canopy cover in the 130th/145th Station Area may be less than that of Alternative 5. The Preferred Alternative's potential for leading to increased delivery of stormwater contaminants to streams in that area would be similar to that of Alternative 5.

What are some solutions or mitigation for impacts?

The City has long-standing and new regulations intended to address stormwater quality and tree canopy retention. Measures that may increase and enhance tree canopy cover include the following:

- Implement a Green Factor requirement in Urban Neighborhood Residential zones. The Green Factor is a menu of landscaping strategies that is intended to increase the amount and quality of urban landscaping while allowing increased flexibility for developers and designers to efficiently use their properties.
- Add an open space requirement in urban neighborhood zones, encouraging space for trees. (As of ~~Spring~~ early 2025~~4~~, the City anticipates adopting new zoning standards in urban neighborhood zones, to allow for middle housing types that have footprints offering consolidated open space areas).
- Develop an adaptive management policy to collect, monitor, analyze, and learn from the results of code application and to assess the Tree Protection Code's effectiveness in achieving the goals of retaining or replanting trees and increasing canopy cover while allowing for more housing options.
- Encourage or require attached units rather than detached units, which could result in more plantable area by eliminating small corridors between buildings. This option may be feasible in areas that would be classified as neighborhood center, urban neighborhood, or corridor under the action alternatives.
- Increase funding or use of in-lieu fees for City-led tree planting and maintenance in parks and rights-of-way, particularly in areas identified as heat islands.
- Expand existing programs such as Trees for Neighborhoods, which provides trees and support for people who want to plant trees on their property or in the adjacent right-of-way.
- Develop a comprehensive plan for investment in the equitable distribution and resilience of the urban forest.
- Investigate technologies such as flexible pavement, soil cells, expanded tree pits, and appropriate soil types in City-owned rights-of-way.
- Pursue creative approaches for maximizing green infrastructure in appropriate locations in City-owned rights-of-way—for example, installing planted bike lane and curb line buffer strips between curbs and sidewalks, or replacing parking spots and curb bulbs to support park-scale street trees.
- Collaborate with Seattle Public Schools and organizations such as Green Schoolyards America to increase tree cover on school grounds.

Possible additional measures for reducing the risk of delivering contaminants to fish-bearing streams include the following:

- Retrofit existing stormwater facilities to increase storage capacity and improve water quality treatment.

- Adopt stormwater detention standards that require new parcel development to detain larger volumes of stormwater runoff on-site and in a manner that mimics predeveloped stormwater patterns.
- Set lower development size thresholds to require more parcel projects to install on-site stormwater management.
- Set lower limits for the maximum percentage of a new development that could be covered with impervious surfaces.
- Encourage expanded use of soil amendments to facilitate stormwater infiltration (i.e., low-impact development practices) where technically feasible.
- Sponsor or encourage public education about the threats posed to fish by contaminants in stormwater runoff.
- Provide a stronger program for maintaining stormwater treatment and detention facilities.

With mitigation, what is the ultimate outcome?

Under any of the alternatives, population growth in Seattle will drive development and redevelopment of residential and commercial properties. Differences in the availability or distribution of habitats in the city would be unlikely to result in any appreciable impacts on ~~regional~~ populations of plants or animals in or near Seattle. Based on this consideration, combined with the existing statutory and regulatory requirements that provide protection for plants and animals, none of the alternatives would be expected to result in impacts that would reduce the likelihood that populations of native plant or animal species would persist in or near Seattle~~of survival or recovery of a plant or animal species in the wild~~.

Similarly, none of the action alternatives would be expected to have significant, unavoidable adverse impacts on aquatic species and habitats. On-site stormwater management would likely be required for development or redevelopment projects within the city limits (see **Section 3.1.4**). Implementation of required stormwater management would occur under any of the alternatives. For these reasons, none of the action alternatives would be expected to result in an appreciable increase (compared to the No Action Alternative) in the delivery of stormwater contaminants to ~~fish-bearing streams~~surface waters. This, in turn, would avoid or minimize the potential for adverse impacts on fish, wildlife, and their habitats.

Also, none of the action alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover. As discussed in **Section 3.3.3**, the City's current tree protection regulations minimize the potential for development-related loss of tree canopy cover. For this reason, none of the action alternatives would result in a substantially higher potential for development-related tree canopy cover loss, compared to the No Action alternative. In addition, the potential for canopy loss due to other factors would be the same under all alternatives.

Encouraging residential and commercial development within the urban environment of Seattle could indirectly benefit tree canopy cover regionally by easing development pressure in less-developed areas outside the city. Increasing density in the city—particularly given the City's

requirements for tree protection and replacement—would have fewer adverse impacts than would the conversion of undeveloped parcels in suburban areas to low-density residential uses. In addition, development-related canopy loss under any of the alternatives would be expected to have a relatively minor influence on the total amount of tree canopy cover in the city.

Summary of Thresholds

Exhibit 1.6-5 summarizes potential impacts based on the evaluation in **Section 3.3 Plants & Animals**.

Exhibit 1.6-5. Plants & Animals Thresholds of Significance

Metric	Threshold	Alt. 1	Alt. 2	Alt. 3	Alt. 4	Alt. 5	Pref.
	Impacts that would reduce the likelihood that populations of native plant or animal species would persist in or near Seattle~~of survival or recovery of a plant or animal species in the wild~~, compared to the No Action alternative.[1]	Future baseline	—	—	—	—	—
☒ Equity & Climate	A substantially increased rate of tree canopy cover loss, compared to the No Action alternative.[2]	Future baseline	▽(-)	▽(+)	▽(-)	▽(+)	▽(+)
	An appreciable increase in the delivery of stormwater contaminants to fish-bearing streams, compared to the No Action alternative.[3]	Future baseline	—	—	—	—	—

Note: Impacts are considered either unavoidable adverse (▼▼), adverse but able to be mitigated (▼), impact but less than adverse (▽), limited or none (—), moderately positive (△), or positive (▲). The Preferred Alternative was added to this exhibit, and associated analysis in the notes, since the Draft EIS—no changes were made to the impact summary for Alternatives 1–5.

1 Given that habitats in the city limits represent a very small proportion of the total amount of habitat available to any species, differences in the availability or distribution of habitats in the city would be unlikely to result in any appreciable impacts on regional populations of plants or animals. Based on these considerations, none of the alternatives would be expected to result in impacts that would reduce the likelihood that populations of native plant or animal species would persist in or near Seattle ~~of survival or recovery of a plant or animal species in the wild~~.

2 Within the range of the action alternatives, Alternative 2 has less conversion potential (-) and the Preferred Alternative ~~3~~ the most (+), with Alternative 4 closer to Alternative 2 and Alternatives 3 and 5 closer to the Preferred Alternative ~~3~~.

3 On-site stormwater management would likely be required for development or redevelopment projects within the city limits. Implementation of required stormwater management would occur under any of the alternatives and would prevent or minimize the delivery of contaminants to ~~fish-bearing streams~~surface waters. This, in turn, would avoid or minimize the potential for adverse impacts on ~~aquatic species~~ fish, wildlife, and their habitats.

1.6.4 Energy & Natural Resources

Source: City of Seattle, 2023.

How did we analyze Energy & Natural Resources?

This section addresses impacts related to energy and other natural resources. Models employed for air quality and transportation provide data useful to calculate energy use from transportation sources and buildings. Thresholds of significance utilized in this impact analysis include:

- Energy usage in excess of projected supply availability.
- Conflict with energy policies adopted by the City of Seattle.

What impacts did we identify?

Construction Impacts: Future growth under any alternative would result in development of new residential, retail, light industrial, office, and commercial use. Fossil fuels for construction vehicles and other energy-consuming equipment would be used temporarily and would not represent a significant demand on energy resources. Selecting building materials composed of recycled materials requires substantially less energy to produce than non-recycled materials and could be promoted to reduce construction energy impacts.

What is different between the Alternatives?

Citywide

Transportation Energy: The EIS authors projected total vehicle miles traveled (VMT) by passenger vehicles, trucks, and buses to estimate annual transportation energy usage. **Exhibit 1.6-6** identifies total VMT by alternative. Alternative 1 produces the least total VMT and the Preferred Alternative ~~5~~ the most total VMT but all alternatives—including the No Action Alternative—will result in an increase in VMT over the existing condition. Although growth targets under Alternative 5 and the Preferred Alternative would be the same, the difference in the allocation of growth results in differing trip patterns and VMT. VMT under the Preferred Alternative would be approximately 0.38% greater than Alternative 5. As a result, estimated demand for all fuel types under the Preferred Alternative would be slightly higher than Alternative 5 and the greatest of all alternatives. Implementation of the One Seattle Comprehensive Plan, under all alternatives, would result in increased housing options and densities that, together with additional transit options such as the 130th and 145th Light Rail Stations, would reduce per-capita VMT compared to existing conditions.

Exhibit 1.6-6. Annual Vehicle Miles Traveled

	Existing	Alt. 1	Alt. 2	Alt. 3	Alt. 4*	Alt. 5	Pref. Alt.
Total VMT**	22,272,230	24,434,250	24,776,040	24,670,240	24,776,040	25,199,240	25,293,940
Total VMT excluding buses	22,203,300	24,357,100	24,698,900	24,593,100	24,698,900	25,122,100	25,216,800
VMT per capita cars and trucks	17.2	13.7	13.5	13.5	13.5	13.4	13.2

Note: The Preferred Alternative was added to this exhibit since the Draft EIS—no edits were made to Alternatives 1–5.
*Traffic data is not available for Alternative 4 because the projected VMT would fall between Alternative 2 and Alternative 3. For purposes of the analysis, it has been assumed that Alternative 4 VMT is equivalent to Alternative 2, which is higher than Alternative 3.
Includes cars, trucks, and buses. VMT in **Section 1.6.10 and **Section 3.10 Transportation** excludes buses.
Source: Fehr & Peers, 2024~~3~~.

See **Exhibit 1.6-7** for a comparison of annual fuel usage for studied alternatives in units of trillion British Thermal Units (Btu). All alternatives would use more gas, diesel, and compressed natural gas (CNG). Alternatives 3 and 5 and the Preferred Alternative would use more ethanol.

Exhibit 1.6-7. Annual Transportation Fuel Usage (Trillion Btu)

	Existing	Alt. 1	Alt. 2	Alt. 3	Alt. 4*	Alt. 5	Pref. Alt.**
Gasoline	0.347081	0.338094	0.347765	0.347735	0.347735	0.359576	0.36092
Diesel	0.01415	0.02023	0.02067	0.02069	0.02069	0.02122	0.02130
CNG	0.00012	0.000162	0.000162	0.000162	0.000162	0.000162	0.00016
Ethanol	0.00062	0.00063	0.00065	0.00065	0.00065	0.000677	0.00067

Note: The Preferred Alternative was added to this exhibit, and associated analysis in the notes, since the Draft EIS—edits made to Alternatives 1–5 are shown in tracks.
* Traffic data is not available for Alternative 4 because the projected VMT would fall between Alternative 2 and Alternative 3. For purposes of the analysis, it has been assumed that Alternative 4 VMT is equivalent to Alternative 2, which is higher than Alternative 3.
** Growth targets under Alternative 5 and the Preferred Alternative would be the same. The difference in the allocation of growth results in differing trip patterns and VMT. VMT under the Preferred Alternative would be approximately 0.38% greater than Alternative 5. Preferred Alternative fuel usage estimates have been estimated by increasing Alternative 5 fuel usage by 0.38%.
Source: Kimley-Horn, 20243.

Building Energy Demand: Increases in development would increase population and employment in the City of Seattle and would increase energy consumption. All future development would be required to adhere to energy efficiency standards combined with increased efficiency through performance requirements of the Seattle and Washington Energy Codes fostered by the Climate Action Plan and all-electric space and water heating required by the 2022 Washington Energy Code. Development within the City of Seattle under all alternatives will primarily be comprised of commercial, industrial, and residential. All new development or redevelopment would be designed and constructed to meet the applicable state and City building and energy conservative code requirements which would reduce energy consumption as compared to prior structures which likely used more energy consumption on a pro rata basis. A mixture of newer and older development would likely be more energy efficient than existing development, based on changes to building codes, innovations in building and technologies, and compliance with City energy conservation measures such as regular building tune-ups (in effect until December 31, 2028).

Using federal annual end-use consumption data for various housing types in the western US, the EIS team estimated electricity and natural gas usage under each alternative from new building square footage due to target growth; see **Exhibit 1.6-8**. Residential dwellings vary by alternative–80,000 dwelling units for Alternative 1, 100,000 dwelling units for Alternatives 2 through 4, and 120,000 dwelling units for Alternative 5 and the Preferred Alternative—but employment is similar in all alternatives, thus the difference is in household demand. Alternative 5 and the Preferred Alternative with the greatest dwelling units would have the most demand for electricity and natural gas, with slightly higher overall demand under the Preferred Alternative than Alternative 5, and Alternative 1 the least. Non-residential consumption has been estimated based on 2020 data on building energy benchmarking for industrial and commercial uses from Seattle City Light. Compared to existing energy per capita energy usage of 0.0002 trillion Btu

electricity and 0.00004 trillion Btu natural gas per capita in the State, per capita energy demand of all alternatives would be lower.

Exhibit 1.6-8. Building Energy Demand, New Building Square Footage Growth—Electricity and Natural Gas (trillion Btu)

	Alt. 1	Alt. 2	Alt. 3	Alt. 4	Alt. 5	Pref. Alt.
Electricity						
Residential	1.29	1.58	1.64	1.61	1.91	2.08
Commercial	1.56	1.56	1.56	1.56	1.56	1.56
Industrial	0.37	0.37	0.37	0.37	0.37	0.37
Total Demand	3.22	3.51	3.58	3.54	3.84	4.01
Percent of Statewide Consumption	1.04~~0.18~~%	~~0.20~~1.13%	~~0.20~~1.15%	~~0.20~~1.14%	~~0.22~~1.24%	1.29%
Per Capita Electricity Demand*	0.000020	0.000017	0.000017	0.000017	0.000016	0.000016
Natural Gas						
Residential	0.17	0.21	0.21	0.21	0.25	0.26
Commercial	0.55	0.55	0.55	0.55	0.55	0.55
Industrial	0.18	0.18	0.18	0.18	0.18	0.18
Total Demand	0.90	0.94	0.95	0.94	0.98	1.00
Percent of Statewide Consumption	0.26~~7~~%	0.27~~8~~%	0.27~~8~~%	0.27~~8~~%	0.28~~9~~%	0.28%
Per Capita Natural Gas Demand*	0.0000055	0.0000046	0.0000046	0.0000046	0.0000040	0.0000041

Note: The Preferred Alternative was added to this exhibit since the Draft EIS—edits made to Alternatives 1–5 are shown in tracks.
* Per capita demand based on projected population increase.
Source: Kimley-Horn, 2024~~3~~.

Equity & Climate Vulnerability Considerations

Extreme heat events will create increased energy demand for cooling while decreasing capacity and efficiency of energy systems as transmission lines and substations are stressed. Energy demand from buildings is lowest under Alternative 1 and greatest under the Preferred Alternative followed by Alternative 5 as noted above. Among Alternatives 2 through 4 with the same growth of 100,000 new dwellings but different patterns and types of housing, Alternatives 2 and 4 have lower building energy demand with more compact housing types in neighborhood centers and corridors compared to Alternative 3 with more distributed housing in urban neighborhoods. As new buildings are constructed, measures to promote building and site design that promote passive cooling may be appropriate. All alternatives have this potential to address cooling needs.

130th/145th Station Area

Alternative 1: Under Alternative 1, zoning designations would be retained within the 130th/145th Station Area and no new areas will be designated for mixed-use or higher density than exists under existing conditions. The future light rail station at 130th would be developed in an area that would allow three-story single-purpose residential development and four- to eight-story multifamily in the land surrounding the future 145th BRT Station. Impacts on supply availability related to existing conditions would be nominal:

- Alternative 1 assumes a growth potential of 840 housing units and 716 jobs, requiring approximately 0.02 trillion Btu of electricity and 0.005 trillion Btu of natural gas per year. This constitutes approximately 0.008~~1~~% and 0.001% of statewide electricity and natural gas usage, respectively.

Alternative 2: Under Alternative 2, changes in land use designations focus on addressing transit-oriented developments, designating the station areas as neighborhood centers. Growth would be clustered in small mixed-use nodes near transit, resulting in denser and taller buildings with heights of up to 80 feet. Impacts on supply availability in comparison with existing conditions would be nominal:

- Implementation of Alternative 2 assumes a growth potential of 2,208 housing units and 979 jobs, requiring approximately 0.05 trillion Btu of electricity and 0.009 trillion Btu per year of natural gas. This constitutes approximately 0.016~~03~~% and 0.003% of statewide electricity and natural gas usage, respectively, which are more than double the requirements of Alternative 1.

Alternative 5: Under Alternative 5, an urban centers designation on both the west and east sides of the 130th Station Area would merge with an existing commercial node to expand residential mixed use near the station. Growth would be accommodated in more mixed-use buildings, providing greater housing types in buildings with heights of up to 95 feet. Energy requirements under this alternative would be slightly higher than Alternative 2 and impacts on supply availability in comparison with Alternative 2 would be nominal.

- Implementation of Alternative 5 assumes a growth potential of 2,703 housing units and 1,004 jobs, requiring approximately 0.05 trillion Btu of electricity and 0.01 trillion Btu of natural gas per year. This constitutes approximately 0.017~~03~~% and 0.003% of statewide electricity and natural gas usage, respectively.

Preferred Alternative: Under the Preferred Alternative, similar to Alternative 5, an urban center designation on both the west and east sides of the 130th Station Area would merge with an existing commercial node to expand residential mixed use near the station. Growth would be accommodated in more mixed-use buildings, providing greater housing types in buildings with heights of up to 85 feet. The Station Area's share of the Preferred Alternative housing growth target is approximately 1.8%.

- Implementation of the Preferred Alternative assumes a growth potential of 2,152 housing units and 658 jobs, requiring approximately 0.05 trillion Btu of electricity and 0.008 trillion Btu of natural gas per year. This constitutes approximately 0.016% and 0.002% of

statewide electricity and natural gas usage, respectively. Energy requirements under this alternative would be slightly lower than Alternative 2 and impacts on supply availability in comparison with Alternative 2 would be similar.

What are some solutions or mitigation for impacts?

In addition to the One Seattle Plan policy updates and regulations and commitments, the following mitigation efforts would reduce the use of power in building heating and cooling:

- Installation of solar (photovoltaic) and other local generating technologies.
- Implementation of sustainable requirements including the construction and operation of LEED-compliant (or similar ranking system) buildings.
- The use of passive systems and modern power saving units.
- Use of alternative forms of energy could be included in larger developments where installation is cost effective.
- Implementation of conservation efforts and renewable energy sources to conserve electricity in new developments, including energy efficient equipment (i.e., light bulbs, appliances, and heating and air conditioning), and could reduce energy consumption.

With mitigation, what is the ultimate outcome?

No significant unavoidable adverse impacts on energy are anticipated. The development capacities proposed under all alternatives would increase overall energy consumption. This is mitigated by applying energy codes to new development and VMT measures for building and transportation energy usage. Adherence to energy efficiency measures would ensure that future development would not result in consumption of energy resources in excess of projected supply availability.

Average annual transportation fuel consumption would increase under all alternatives when compared to existing conditions by less than one percent due to the increase in total VMT associated with projected growth. However, with increased average vehicle fuel efficiency and providing the infrastructure and opportunity for people living and working in the City of Seattle to access alternative transportation modes, action alternatives would not result in the consumption of energy resources in excess of projected supply and would not conflict with energy policies adopted by the City of Seattle.

Since average annual energy use per capita is expected to decrease, the action alternatives would not conflict with energy policies adopted by the City of Seattle.

Summary of Thresholds

Exhibit 1.6-9 summarizes potential impacts based on the evaluation in **Section 3.4 Energy & Natural Resources**.

Exhibit 1.6-9. Energy Thresholds of Significance

Metric	Threshold	Alt. 1	Alt. 2	Alt. 3	Alt. 4	Alt. 5	Pref.
	Energy usage in excess of projected supply availability.[1]	—	—	—	—	—	—
	Conflict with energy policies adopted by the City of Seattle[2]	—	—	—	—	—	—

Note: Impacts are considered either unavoidable adverse (▼▼), adverse but able to be mitigated (▼), impact but less than adverse (▽), limited or none (—), moderately positive (△), or positive (▲). The Preferred Alternative, and associated analysis in the notes, was added to this exhibit since the Draft EIS—no changes were made to the impact summary for Alternatives 1–5.

1 The development capacities proposed under all alternatives would increase overall energy consumption. Adherence to energy efficiency measures would ensure that future development would not result in the consumption of energy resources in excess of projected supply availability. Average annual transportation fuel consumption would increase under all alternatives when compared to existing conditions by less than one percent due to the increase in total VMT associated with projected growth. Providing the infrastructure and opportunity for people living and working in the City of Seattle to access alternative transportation modes, action alternatives would not result in the consumption of energy resources in excess of projected supply.

2 Improvements in fuel efficiency combined with reductions in VMT would contribute to reductions in transportation fuel demand on a per capita basis. Compared to existing energy per capita energy usage in the State, per capita energy demand of all alternatives would be lower. Since average annual energy use per capita is expected to decrease, the action alternatives would not conflict with energy policies adopted by the City of Seattle.

1.6.5 Noise

How did we analyze Noise?

The EIS evaluates noise/vibration impacts associated with implementing the alternatives considered in this EIS. The evaluation considers available reports, regulatory requirements, and guidance from federal, state, port, and city sources. The EIS noise expert reviewed technical data from noise monitoring locations and employed a Federal Highway Administration (FHWA) traffic noise model. Thresholds of significance utilized in this impact analysis include:

- The alternative would cause future traffic noise levels of 10 dBA or more above existing noise levels.
- Noise-sensitive receivers are concentrated near noise-generating (non-residential) activities or major roadways.

What impacts did we identify?

Construction Noise: Resulting construction activities associated with development of new residences, commercial and retail land uses, and mixed-use developments would have the potential to temporarily affect nearby sensitive receivers such as existing residences, schools, and nursing homes. Construction activities with the highest potential for construction-related noise or vibration impacts are those that require pile driving or other similar invasive foundation work. These types of construction activities are generally associated with high-rise development which all alternatives envision to occur within urban centers. The Seattle noise ordinance restricts the use of impact equipment to certain times of day and noise levels. The City of Seattle does not enforce quantitative vibration standards.

Transportation Noise Contribution by Alternatives: Traffic noise levels for all alternatives would increase by less than 1.5 dBA along all roadway segments modeled roadways. Outside of the laboratory, a 3-dBA change is considered a just-perceivable difference, and a 5-dBA change is clearly perceptible and is typically considered substantial. Consequently, an increase of less than 1.5 dBA would be considered a minor impact on environmental noise.

What is different between the Alternatives?

Citywide

Operational Noise Sources: If an active industrial development is proposed adjacent to noise-sensitive land uses, noise compatibility problems could arise. Noise levels from stationary sources would be required to comply with the exterior sound level limits outlined in the City's Noise Ordinance (SMC Chapter 25.08). Following compliance with the City's Noise Ordinance, stationary noise source impacts from all alternatives would not be significant.

Equity & Climate Vulnerability Considerations

Exterior noise levels in Seattle close to highways, freeways, and high traffic roadways can exceed 65 dBA L_{dn}. The 65 dBA L_{dn} noise level is important because it represents the exterior noise level which can be reduced to 45 dBA L_{dn} using standard construction techniques. The U.S. Department of Housing and Urban Development (HUD) utilizes a screening distance of 1,000 feet of highways or major roadways, 3,000 feet for railroads, and 15 miles for FAA-regulated airfields to evaluate transportation noise effects at sensitive receivers. EIS analysis indicates that existing uses along Interstate 5 (I-5) north of Interstate 90 (I-90) consist primarily of residential uses, within 1,000 feet of transportation noise sources.

Most alternatives seek to locate residential uses near transit or highly traveled roadways to reduce vehicle miles traveled within the city. New sensitive receptors (e.g., residential uses) could be located within noise contours up to 65 dBA L_{dn} (or greater) due to proximity to roadway, rail, and airport noise sources. Alternative 1 would have the lowest growth and Alternative 5 and the

Preferred Alternative the most. Alternative 4 would put more density in corridors, some of which is found in the 1,000-foot buffer, and more impact is anticipated under Alternative 4 than Alternative 2. The growth strategy of Alternative 5 and the Preferred Alternative would result in a ~~the~~ densest~~est~~er concentration of sensitive uses near major highways/roadways, transit facilities, and industrial/maritime uses compared to Alternatives 1 through 4, with the greatest concentration of sensitive uses near major noise sources under the Preferred Alternative.

Alternative 1 would locate several urban centers and urban villages within 1,000-feet of roadways with greater than 100,000 daily vehicles. Alternatives 1, 3, and 4 would have less population in proximity to the 1,000 feet of the major roadways than Alternatives 2 and 5 and the Preferred Alternative based on the areas of focus for growth associated with the Alternatives. Alternative 2 would place a greater number of units within the 1,000-foot buffer when compared to Alternative 1, 3, and 4, but fewer units compared to Alternative 5 and the Preferred Alternative. Alternative 5 and the Preferred Alternative would place a ~~the~~ greater~~st~~ number of units within the 1,000-foot buffer when compared to ~~the other~~ Alternatives 1 through 4, with the greatest number of units within the 1,000-foot buffer under the Preferred Alternative.

130th/145th Station Area

Alternative 1: Under Alternative 1, the 130th/145th Station area would experience minimal traffic noise increases and stationary source noise levels (e.g., HVAC systems, parking noise, conversations, and other noise sources typical of urban areas) but highway traffic noise sources would continue to dominate the existing noise environment.

Alternative 2: Under Alternative 2, the 130th/145th Station Area would be designated as neighborhood center and would include a mix of low-rise residential, midrise residential, and neighborhood commercial uses. Some traffic noise and stationary source noise levels could increase though not above background highway traffic noise. Alternative 2 would site residents and commercial/retail uses near transit hubs, which would likely reduce traffic and traffic noise levels associated with increased development in the area.

Alternative 5 and the Preferred Alternative: Noise impacts at the Station Area would be most substantial under Alternative 5 and the Preferred Alternative, which includes the strategies for encouraging housing growth in Alternatives 2, 3, and 4 plus some additional changes to existing regional center and urban center boundaries and changes to place type designations. Under this alternative, an urban center would be created on both the west and east sides of I-5 at the Sound Transit light rail station. As a result, the 130th/145th Station Area would experience higher traffic noise and stationary source noise at increases than Alternatives 1 through 4.

What are some solutions or mitigation for impacts?

Measures to Reduce Construction-Related Noise & Vibration Impacts

In addition to restrictions on the hours of construction in accordance with the Seattle Noise Ordinance, other mitigation that could be applied includes:

- Installing barriers to shield noise sensitive receptors and enclosing stationary work.
- Selecting haul routes to avoid noise sensitive areas.
- Using fully baffled compressors, or preferably electric compressors.
- Using fully mufflered construction equipment.
- Use low-noise emission equipment.
- Monitor and maintain equipment to meet noise limits.
- Prohibit aboveground jack hammering and impact pile driving during nighttime hours.

To reduce potential moderate adverse noise impacts from impact pile driving activities adjacent to noise-sensitive land uses (within 50 feet) or moderate adverse vibration impacts to historic structures, the One Seattle Comprehensive Plan could consider adoption of a policy recommending the Seattle Noise Ordinance be updated to require best practices for noise control, including "quiet" pile-driving technology and using temporary sound walls or cushion blocks.

Measures to Reduce Land Use Compatibility Noise Impacts

Although mitigation measures are not required due to a lack of significant adverse impact findings, to reduce the potential for exposure of residences and other noise-sensitive land uses to incompatible environmental noise, the One Seattle Plan could consider adoption of a policy that recommends that residences and other noise-sensitive land uses (i.e., schools, day care) be separated from freeways, railways, ports, and other active industrial facilities where exterior noise environments exceed 65 dBA L_{dn}. If sensitive land uses are proposed in such areas, a policy addressing the need for additional mitigation strategies could be considered to achieve an interior noise performance standard of 45 dBA L_{dn}. The types of implementation measures that could help to accomplish this include:

- Coordination with WSDOT on sound wall construction.
- Use of appropriate building materials such as walls and floors with a sound transmission class (STC) rating of 50 or greater.
- Site design measures, including use of window placement to minimize window exposure toward noise sources, avoid placing balcony areas in high noise areas, and use of buildings as noise barriers.
- Use of acoustically rated building materials (insulation and windows).

In addition, zoning land use criteria or boundaries could be established, while meeting other planning goals, to limit the proximity of new residential development to known or anticipated sources of high noise levels.

With mitigation, what is the ultimate outcome?

Under all studied alternatives, increased residential and employment growth could result in increased traffic volumes, though the resulting noise increases are not anticipated to exceed 3dBA, the threshold of change that is perceptible. The location of noise sensitive receivers (e.g., residential uses) near traffic, rail, or industrial noise sources could occur under all alternatives, particularly Alternatives 4 and 5 and the Preferred Alternative. Implementation of residential noise mitigation described in the previous subsection should adequately reduce noise experienced by noise-sensitive receivers. With the application of mitigation measures described above, no significant unavoidable adverse noise impacts would occur under any of the alternatives.

Summary of Thresholds

Exhibit 1.6-10 summarizes potential impacts based on the evaluation in **Section 3.5 Noise**.

Exhibit 1.6-10. Noise Thresholds of Significance

Metric	Threshold	Alt. 1	Alt. 2	Alt. 3	Alt. 4	Alt. 5	Pref.
	The alternative would cause future traffic noise levels of 10 dBA or more above existing noise levels.[1]	▽	▽	▽	▽	▽	▽
☒ Equity & Climate	Noise-sensitive receivers are concentrated near noise-generating (non-residential) activities or major roadways.[2]	▽	▽	▽	▼	▼	▼

Note: Impacts are considered either unavoidable adverse (▼▼), adverse but able to be mitigated (▼), impact but less than adverse (▽), limited or none (—), moderately positive (△), or positive (▲). The Preferred Alternative, and associated analysis in the notes, was added to this exhibit since the Draft EIS—no changes were made to the impact summary for Alternatives 1–5.

1 Traffic noise levels for all Alternatives would increase by less than 1.5 dBA along all roadway segments modeled ~~roadways~~ less than the 10dBA or more above existing noise levels. Consequently, an increase of less than 1.5 dBA would be considered a minor impact on environmental noise. The Preferred Alternative would result in traffic noise increases ranging from 1.0 dBA L_{dn} to 2.4 dBA L_{dn} and would not result in a significant (10 dBA or more) dBA noise increase.

2 Alternative 4 would focus more growth near transit and major highways/roadways than Alternatives 1 through 3 considered a moderately adverse noise impact that can be reduced with mitigation measures. Alternative 4 would place the fewest number of units (the same as Alternatives 1 and 3) within the 1,000-foot buffer when compared to Alternative 2 and 5 and the Preferred Alternative. Alternative 5 would place a greater number of units within the 1,000-foot buffer when compared to Alternatives 1 through 4 and would place fewer units within the 1,000-foot buffer when compared to the Preferred Alternative. The growth strategy of ~~Alternative 5~~ the Preferred Alternative would result in the densest concentration of sensitive uses near major highways/roadways, transit facilities, and industrial/maritime uses, considered a moderately adverse noise impact but mitigation measures would reduce this noise impact.

1.6.6 Land Use & Urban Form

How did we analyze Land Use & Urban Form?

The EIS evaluates current land and shoreline uses, physical form, and views. It reviews land use patterns and compatibility, urban form (height, bulk scale, transitions, and tree canopy), shadows, and views as well as resulting equity and climate vulnerability considerations. Elements of the analysis include:

- **Land use patterns** consider the distribution of growth and intensity of planned uses as well as resulting activity levels.
- **Land use compatibility** considers changes in use type between adjacent areas and any likely incompatibilities. Land use incompatibilities could be related to health and safety (such as noise levels or odors), activity levels at various times of day/night, or conflicting movement patterns.
- **Height, bulk, and scale** considers the physical form, aesthetic, and character of development (such as massing, setbacks, height, and FAR).
- **Transitions** consider visual changes in physical form between adjacent areas.
- **Tree canopy** considers how urban form affects tree canopy.
- **Shadows** consider shading of public open space or rights-of-way as a result of allowed development and the possible implications related to health, urban heat, and the human experience.
- **Views** consider the protection of public views of important landmarks and natural features, as well as views from specific designated viewpoints within the city and scenic qualities along mapped scenic routes.

What impacts did we identify?

Citywide

The major topics are addressed below with impacts common to all alternatives.

- **Land Use Patterns:** Activity levels would increase across the city with new residents, businesses, and employees. The primary differences between the alternatives lie in the distribution and intensity of growth across the city and the projected land use patterns.
- **Land Use Compatibility:** Future growth under all alternatives is likely to increase the frequency of different land use types locating close to one another, and similarly likely to increase the frequency of land use patterns that contain mixes of land uses with differing levels of intensity, both within areas currently designated as urban centers and villages and, to a varying extent, in other areas of the city.

- **Height, Bulk, and Scale:** Future growth and development directed into existing urban centers and villages under all alternatives would result in a moderate amount of additional height and bulk in these commercial and mixed-use nodes.
- **Transitions:** Gradual redevelopment of new buildings that are larger than those they replace is likely to occur under all alternatives, especially in urban centers and villages. Redevelopment would create a potential for localized adverse compatibility issues as existing, lower-intensity uses transition to higher-intensity development forms. For example, areas that are predominately composed of detached single-family homes may experience more occurrences of sharper transitions in urban form as new, more intensive forms—such as townhomes and multi-family apartments—could be built alongside existing single-family homes. Redevelopment could also result in sharper transitions between zones and place types.
- **Trees:** Bulkier development under all alternatives would likely displace some trees on private property, especially in residential zones. This is a threshold that helps the City consider equity and climate implications.
- **Shadows:** Under any alternative, redevelopment will generally be taller and often bulkier than the existing building. Taller buildings cast longer shadows, and bulkier buildings cast wider shadows, especially downhill. Some development would likely occur adjacent to parks under all alternatives; an adjacent southern building is most impactful throughout the day. Height limits and street widths vary throughout Seattle, but in all cases, east-west-oriented streets are challenging for solar access, especially during wintertime. In most cases, the 3-story and taller buildings on the south side would shade the southern side of the street throughout the year except summertime and may shade both sides of the street throughout a winter day.
- **Views:** Under all alternatives, new buildings would develop with greater height and bulk and, with these increases, development may interfere with publicly protected views. Because these views are protected under current regulations, views would remain unobstructed as long as potential impacts are identified during permit review. Of note, the number of SEPA-protected viewpoints, scenic routes, and Seattle-designated historic landmarks means that view corridors impact development capacity on many sites.

Equity & Climate Vulnerability Considerations

Regarding equity and climate considerations, the Land Use & Urban Form section addresses the relationship of height and density to housing choice, creation of community building spaces, as well as active transportation, and other climate considerations including tree canopy cover and heat islands. Two of the topics are summarized below. See **Section 3.6** for more information.

Height and Density: Relationship to Housing Supply & Affordability

The present combinations of allowed height, FAR, and setbacks found in Seattle's zoning regulations generally led to denser housing with many studio and 1-bedroom units over the last 20 years. A broad, citywide approach to allowing increased density with taller buildings

would likely have more equitable impacts to housing choice, a more varied urban form, and more opportunity for vibrant neighborhoods.

- Alternatives 1 and 2 would largely continue current patterns.
- ~~Alternative 3:~~ Alternative 3 would allow middle housing types such as duplexes, triplexes, fourplexes, sixplexes, and stacked flats in all Neighborhood Residential zones, and would provide more options for people to stay in their community over a lifetime and across generations. Housing configurations that cluster more units together on a site provide more opportunities for intergenerational families to live near each other.
- Alternative 4 offers a wider range of housing types similar to Alternative 3 as well as 5-story buildings close to transit and parks. The likely increase in housing type variety would provide more housing for different life stages similar to Alternative 3. Increasing housing type options across half of Neighborhood Residential zones in the city also increases the opportunities for people to live in parts of the city economically closed off to them in Alternative 1.
- Alternative 5 and the Preferred Alternative combine~~s~~ the place types found in Alternatives 2–4 and therefore could provide the most housing type variety and choice ~~amongst all the alternatives~~.

Relationship to Street-level Community-building Spaces

A lively, vibrant neighborhood center is dependent on having a robust residential population nearby. The expected patterns of development, with increased height, bulk, and scale, could improve the ability to gather in public places and cultural anchors (i.e., culturally relevant businesses, services, religious institutions, arts, etc.), as long as commercial space displacement is mitigated and appropriate gathering spaces are provided.

- Alternative 1: Alternative 1 would continue a pattern of small areas of apartments with small, less expensive units surrounded by large areas with high-cost detached homes. This division could limit social wellbeing and sociability. At the same time, these higher densities close to transit and amenities increase opportunities for active living, which in turn increases chances for sociability and wellbeing.
- Alternative 2: Impacts under Alternative 2 would be similar to Alternative 1, but an increase in compact urban form of more housing and commercial uses could provide more spaces and locations where social interactions can happen than under Alternative 1.
- Alternative 3: Although possible future development of middle housing may lead to less open space on lots than under Alternative 1, more units would surround and share the available open space, which would increase opportunities for sociability amongst neighbors.
- Alternative 4: More housing within a 5-minute walk to large parks under Alternative 4 would likely increase opportunities for social interactions and social wellbeing. At the same time, the number of people living along inhospitable arterials, where social interactions can be inhibited by traffic's impact on sense of safety, air quality, and noise would likely increase.
- Alternative 5 and the Preferred Alternative: With ~~the~~ an increase in middle housing types and variety throughout the city and fewer concentrated extremes of higher and lower

density areas, Alternative 5 and the Preferred Alternative would likely have overall positive impacts on social wellbeing and social interactions, similar to Alternative 3. Similar to Alternative 4, there could be impacts with greater density along arterials, but ~~perhaps~~ to a lesser degree with development opportunities more dispersed ~~in~~ under Alternative 5 and the Preferred Alternative.

130th/145th Station Area

The 130th/145th Station Areas will likely redevelop under all alternatives, although the scale, location, and intensity of that development would vary by alternative. Some commonalities include:

- **Height/bulk/scale.** Large superblocks (longer than 600 feet) lacking a connected internal path or street network mean that direct routes to access the station will be challenging without regulations to encourage or require through-connections with redevelopment. Redevelopment at the light rail station would occur in a physically bifurcated, uncomfortable human environment (at 5th Ave NE, Roosevelt Way, and I-5) and could miss an opportunity to celebrate and activate the station entry.
- **Tree canopy.** Plentiful evergreens, steep slopes, Thornton Creek, and environmentally critical areas near the 130th Station Area make development here unique, and perhaps more constrained, than many other Seattle areas. Existing large evergreen trees make residential areas feel set in hillside woods. Tree preservation could impact development capacity, and redevelopment with a loss of existing trees would have a noticeable effect on the human experience and sense of being set in nature.
- **Shadows.** In general, the existing tall evergreens, combined with steep slopes, significantly shade many residential areas. Shadow impacts from increases in building heights would be less noticeable in these residential areas because of those existing shadows. The north-south orientation of 15th Ave NE, as well as to a lesser extent the diagonal orientation of Roosevelt Way NE, allows for greater solar access for longer hours throughout the year, even with increases in building heights.

What is different between the Alternatives?

Exhibit 1.6-11, **Exhibit 1.6-12**, and the following text summarize and compare land use impacts citywide and within the 130th/145th station areas under each alternative based on the evaluation in **Section 3.6 Land Use Patterns & Urban Form**. A summary of each topic and results is provided after each table.

Citywide

Exhibit 1.6-11. Summary of Land Use and Urban Form Impacts by Alternative—Citywide

Metric	Impact	Alt. 1	Alt. 2	Alt. 3	Alt. 4	Alt. 5	Pref.
	Land Use Patterns	▽	▼	▽	▼	▼	▼
	Land Use Compatibility	▽	▼	▼	▼	▽	▽
	Height, Bulk, & Scale	▽	▼	▼	▼	▼	▼
	Transitions	▼	▽	▲	△	▲	▲
☒ Equity & Climate	Tree Canopy (how urban form affects tree canopy)	▽	▽	▼	▼	▼	▼
	Shadows	▽	▼	▽	▽	▼	▼
	Views	—	—	—	▽	▽	▽

Note: Impacts are considered either unavoidable adverse (▼▼), adverse but able to be mitigated (▼), impact but less than adverse (▽), limited or none (—), moderately positive (△), or positive (▲). The Preferred Alternative was added to this exhibit since the Draft EIS—no changes were made to the impact summary for Alternatives 1–5.
Sources: BERK, 2024~~3~~; MAKERS, 2024~~3~~.

Land use patterns. Growth under all alternatives would increase activity levels and land use intensities across the city resulting in likely adverse impacts to land use patterns. All alternatives focus most future growth into centers currently characterized by higher densities, more compact building forms, and a more diverse mix of uses than other areas of the city. Land use patterns in the neighborhood centers and corridors would intensify more under Alternatives 2 and 4, respectively, than under the No Action Alternative. Under Alternative 3, overall land use patterns would become denser over time within the urban neighborhood zones but most of this development would continue to be residential in nature and would be more spread throughout the analysis areas than the other action alternatives. Alternative 5 and the Preferred Alternative includes the most growth overall and incorporates elements of the other action alternatives—the intensity of land use patterns would shift most dramatically under Alternative 5 and the Preferred Alternative as activity levels increase over time.

Land use compatibility. Future growth under all alternatives is likely to increase the frequency of different land use types locating close to one another, and similarly likely to increase the frequency of land use patterns that contain mixes of land uses with differing levels of intensity, both within the centers and, to a varying extent, in other areas of the city. Land use incompatibilities under the No Action Alternative would be similar to those observed today but could become more severe over time with continuing trends. Under the action alternatives, denser and more mixed-use land use patterns in the new place types could result in localized land use compatibility impacts within the place types or on the border with adjacent residential areas. All neighborhood centers, for instance, already contain areas zoned for commercial or mixed-use development but additional jobs and commercial space could increase more quickly in these areas due to the local demand from new housing. However, adverse compatibility

impacts at the periphery of most existing centers would also be minimized as the new place types redevelop with denser development—this would be most noticeable over the long term under Alternative 5 and the Preferred Alternative as the abutting neighborhood center, corridors, and urban neighborhood areas redevelop. See also the summary of transitions below.

Height, bulk, and scale. Height, bulk, and scale impacts would likely occur under all alternatives as development occurs. Future growth and development directed into existing centers under all alternatives would result in a moderate amount of additional height and bulk in these commercial and mixed-use nodes generally consistent with that experienced during growth over the last 20 years. Under the action alternatives, building heights, bulk, and/or scale in the new place types would likely increase with new development. These impacts would be more pronounced in the neighborhood centers and corridors where height limits would be increased up to 5-7 stories. Where middle housing is allowed in new places, more properties may develop with 3-story (or 4-story if affordable) buildings adjacent to 1- and 2-story buildings. The alternatives vary in the likelihood of localized impacts (Alternatives 1, 2, and to some extent 4) versus more distributed impacts (Alternatives 3 and 5 and the Preferred Alternative).

Transitions. Continued infill development in established centers and villages under the No Action Alternative would likely create increasingly stark contrasts with surrounding lower-scale areas. The new place types introduced under the action alternatives would generally reduce existing contrasts between centers (that see widespread development of large buildings) and surrounding areas (with broad areas that see minimal development). Over time, edges under Alternatives 3 and 5 and the Preferred Alternative would be softened the most as feathered gradations of intensity fill in around nodes of activity, neighborhood amenities, and existing centers.

Tree canopy. Bulkier development under all alternatives would likely displace some trees on private property, especially in residential zones. At the same time, the number of street trees may increase where they are required with redevelopment. Private property may see a greater loss of existing tree canopy under the action alternatives with more widespread redevelopment. For example, the increase in size and number of buildings allowed on a lot in Alternatives 3 and 5 and the Preferred Alternative will likely decrease the amount of space available for trees on urban neighborhood lots.

Shadows. Under any alternative, taller and often bulkier redevelopment will cast longer and/or wider shadows than existing development. Building shadows can be considered positive for climate adaptation to reduce summertime heat but can be negative for human health and wellbeing (especially during winter) and the health of existing trees if accustomed to full sun. Over time, increased height limits in the neighborhood centers, corridors, and expanded urban centers under Alternatives 2, 4, and 5 and the Preferred Alternative would likely result in longer shadows over a greater portion of the day compared to the other alternatives and may be most impactful where shadows would fall downhill or on east-west oriented neighborhood main streets.

Views. Future development under Alternatives 1 through 3 would present limited disruptions to public views. Growth would continue to concentrate in centers (which tend to contain few

viewpoints), most public viewpoints are outside the neighborhood centers in Alternative 2, and there would be no height increase for market-rate development and a minimal height increase for affordable housing in the Neighborhood Residential zones under Alternative 3. Most of the protected viewpoints and scenic routes are within or adjacent to the more intense development expected in the corridor place type under Alternatives 4 and 5 and the Preferred Alternative, and a few are in or near the expanded regional and urban centers in Alternative 5 and the Preferred Alternative. Development under these alternatives may disrupt views in more places.

130th/145th Station Areas

Exhibit 1.6-12. Summary of Land Use and Urban Form Impacts by Alternative—130th/145th Station Areas

Metric	Impact	No Action	Alt. 2	Alt. 5	Pref.
	Land Use Patterns	—	▼	▼	▼
	Land Use Compatibility	▼	▼	▽	▽
	Height, Bulk, & Scale	▽	▼	▼	▼
	Transitions	▼	▽	▲	▲
☒ Equity & Climate	Tree Canopy (how urban form affects tree canopy)	▽	▽	▼	▼
	Shadows	▽	▼	▼	▼
	Views	—	—	▽	▽

Note: Impacts are considered either unavoidable adverse (▼▼), adverse but able to be mitigated (▼), impact but less than adverse (▽), limited or none (—), moderately positive (△), or positive (▲). The Preferred Alternative was added to this exhibit since the Draft EIS—no changes were made to the impact summary for Alternatives 1–5.
Sources: BERK, 2024~~3~~; MAKERS, 2024~~3~~.

Land use patterns and compatibility. No adverse impacts to land use patterns are expected in the station areas under the No Action Alternative. No new areas would be designated for mixed-use or higher density and building types outside existing commercial zoning would remain primarily single purpose with some multi-family uses near the 145th BRT station. Few parcels around 130th would be likely to fully redevelop under the No Action Alternative, though more may see additions (e.g., ADUs) and rebuilds consistent with the existing land use patterns. However, the area may still see increased activity under the No Action Alternative over time as people seek to access the light rail station which could result in compatibility impacts with surrounding lower density residential development. Greater change would occur in the areas currently zoned for more intense development, including the 145th BRT station area and Pinehurst area.

Under Alternatives 2 and 5 and the Preferred Alternative, both station areas would likely redevelop into mixed-use nodes with more growth at greater heights clustered in the newly designated neighborhood centers (Alternatives 2 and 5 and the Preferred Alternative) and urban center (Alternative 5 and the Preferred Alternative). Activity levels and land use

intensities would increase resulting in greater impacts to land use patterns than the No Action Alternative. Compatibility impacts would be similar to those described citywide for neighborhood and urban centers.

Height, bulk, and scale. Changes to height, bulk, and scale would be limited under the No Action Alternative and primarily within the 145th station area. Under Alternatives 2 and 5 and the Preferred Alternative, the station areas could see extensive changes to height, bulk, and scale as a result of proposed zoning capacity increases combined with proximity to the new light rail station. Heights could reach up to 7-8 stories immediately adjacent to the 130th light rail station and in the core of the 145th station area. 15th Ave NE (both in the 145th station area and Pinehurst) as well as NE 125th St at 15th Ave NE and Roosevelt Way NE south of NE 125th St would likely see greater levels of activity, enlivening the street level experience. However, many small commercial spaces currently exist in strip malls or in adapted houses in these areas. Maintaining affordable commercial space in the area for local and BIPOC-owned businesses may be challenging with redevelopment, impacting the social and cultural ties to these neighborhood centers.

Under all alternatives, large superblocks (longer than 600 feet) lacking a connected internal path or street network also mean that direct routes to access the station will be challenging without regulations to encourage or require through connections with redevelopment. Redevelopment at the light rail station would occur in a physically bifurcated, uncomfortable human environment (at 5th Ave NE, Roosevelt Way, and I-5) and could miss an opportunity to celebrate and activate the station entry.

Transitions. Transitions impacts in the station areas would be similar to those described citywide for the No Action Alternative and Alternatives 2 and 5 and the Preferred Alternative. Under Alternatives 2 and 5 and the Preferred Alternative, development of high-intensity buildings in the immediate vicinity of the 130th station area may create abrupt local transitions in scale between existing detached houses and new larger construction. Over time, an evolution of the station area into more consistently intensely used land, combined with smaller scale redevelopment in surrounding low-rise zones, would likely soften these transitions.

Tree canopy. Plentiful evergreens, steep slopes, Thornton Creek, and environmentally critical areas near the 130th Station Area make development here unique, and perhaps more constrained, than many other Seattle areas. Existing large evergreen trees make residential areas feel set in hillside woods. Tree preservation could impact development capacity, and redevelopment with a loss of existing trees would have a noticeable effect on the human experience and sense of being set in nature. Under all alternatives, any redevelopment would fill gaps in street trees along the frontage. Large-scale redevelopment under Alternatives 2 and 5 and the Preferred Alternative in the station areas (more so under Alternative 5 and the Preferred Alternative) would significantly impact the existing tree canopy. Alternatively, if trees are protected "exceptional" trees, development capacity would be constrained.

Shadows. Under all alternatives, the existing tall evergreens, combined with steep slopes, significantly shade many residential areas. Shadow impacts from increases in building heights

would be less noticeable in these residential areas because of those existing shadows. The north-south orientation of 15th Ave NE, as well as to a lesser extent the diagonal orientation of Roosevelt Way NE, allows for greater solar access for longer hours throughout the year, even with increases in building heights. Under Alternatives 2 and 5 and the Preferred Alternative, increased height limits could result in increased shadows on Jackson Park. However, the human experience of the park would not significantly change as tall evergreens already shade the park boundaries.

Views. Impacts to views in the station areas under the No Action Alternative and Alternative 2 would present limited disruptions to public views. Increased height limits near the 130th light rail station under Alternatives 2 and 5 and the Preferred Alternative could have limited impacts on the adjacent I-5 scenic corridor.

What are some solutions or mitigation for impacts?

Citywide

All alternatives would focus the majority of future growth into the existing urban centers and villages. Compatibility challenges would not be an uncommon or new phenomenon in these areas and can be avoided or mitigated by continuing to implement the Land Use Code (Title 23). New place types and/or expanded housing options in existing Urban Neighborhood Residential zones proposed as part of the action alternatives would introduce localized land use and urban form impacts where newer development is of greater height and intensity than existing development. These impacts, if they occur, are likely temporary and will be resolved over time or reduced by the application of existing or new development regulations and design standards. Overall, the new place types would create smoother and more varied transitions in intensity throughout the city (especially adjacent to urban center and village boundaries).

Existing building and land use policies, programs, and codes that promote compact building forms and energy efficient, low-carbon, green building techniques—such as the City's green building permit incentives for private development and the Sustainable Buildings and Sites policy for City-development—would continue to apply under all alternatives.

Under the action alternatives, the City could also update Comprehensive Plan policies to further address the effects of climate change, particularly for communities more vulnerable to the effects of climate stress than others or located in areas in the city that may experience larger effects from climate change (including "heat islands" with more pavement and fewer trees, floodplain and landslide hazard areas, and areas with limited access to transit). For example, the action alternatives focus additional residential growth in areas 1, 2, and 6 which have relatively high levels of existing tree canopy cover. Required frontage improvements could increase the number of street trees with redevelopment, though more and bulkier development under all alternatives would likely displace some trees on private property and reduce tree canopy coverage overall.

130th/145th Station Area

- **Urban design and active transportation: Transit celebration**. Incentivize or require development to relate to, enhance, celebrate, and activate the station entry with transit-oriented commercial and public space.
- **Urban design and active transportation: Intersite connectivity.** Incentivize or require new development to provide new paths or streets to break down large blocks and provide direct, short routes to the station.
- **Street-level community building: Lack of focused public realm.** Undertake a community design effort to develop a cohesive approach toward development of public streets, public realm, or opportunities for shared social gathering that could be implemented through a combination of private development and public projects.
- **Street-level community building: Affordable commercial space.** Implement the 130th & 145th Station Area Planning Plan displacement mitigation strategies.
- **Child-friendly city and social wellbeing: Shared open space.** Incentivize or require outdoor gathering spaces, especially children's play areas, which are oriented away from air and noise pollutants. Consider allowing zero-lot line development to allow for incremental development of interlocking buildings that create an active and varied street front—that can also block air and noise—while consolidating privately shared gathering space internally.
- **Sociability: Small social spaces.** Incentivize or require social corridors and/or shared entries amongst a small group of units in residential development to promote trust-building and social connections. Consider allowing more than 2 single-stair buildings per lot to maximize opportunities for shared entries amongst smaller groups of neighbors.

With mitigation, what is the ultimate outcome?

Over time, additional growth and development will occur in Seattle and a generalized increase in development intensity, height, bulk, and scale is expected under all alternatives—this gradual conversion of lower-intensity uses to higher intensity development patterns is unavoidable but an expected characteristic of urban population and employment growth. No significant unavoidable adverse impacts to land use patterns, compatibility, or urban form are expected under any alternative.

Future growth is likely to result in temporary or localized land use impacts as development occurs. The potential impacts related to these changes may differ in intensity and location in each of the alternatives and many are expected to resolve over time. Application of the City's adopted or new development regulations, zoning requirements, and design guidelines are anticipated to sufficiently mitigate these impacts.

Summary of Thresholds

The results of the Land Use and Urban Form evaluation and SEPA thresholds of significance are addressed in **Exhibit 1.6-11** and **Exhibit 1.6-12**.

1.6.7 Plans & Policies

How did we analyze Plans & Policies?

The EIS reviews adopted state, regional, and City plans and policies that guide growth in Seattle and reviews the proposed alternatives for consistency with the adopted plans and policies—an impact is identified if the proposal would result in an inconsistency with adopted plans and policies.

What impacts did we identify?

Growth Management Act—Goals: All alternatives have sufficient zoned vacant and redevelopable land to accommodate the minimum 20-year population, housing, and job allocations. The action alternatives would each adopt a new growth strategy and each element of the Comprehensive Plan would be updated. The plan would continue to focus growth in an urban area with a range of public services and multimodal transportation options, provide for parks and recreation, and protect critical areas and historic resources consistent with the GMA.

Countywide Planning Policies—Growth Targets: Each studied alternative would provide capacity to meet minimum growth targets for housing and jobs.

What is different between the Alternatives?

Citywide

VISION 2050—Regional Growth Strategy, Development Pattern Policies: The action alternatives would update the Comprehensive Plan to meet VISION 2050 policies. The No Action Alternative would not update the Comprehensive Plan policies, though the growth capacity would still meet minimum growth targets expected of a Metropolitan city. The action alternatives provide for more growth and add capacity to meet additional policies and objectives in VISION 2050 including improved balance of jobs and housing, creating opportunities for middle housing, focusing more growth around transit investments, and contributing to a pattern of growth that supports regional climate goals.

Growth in Seattle that is more balanced between housing and jobs could be beneficial for overall growth patterns in the region and reduce development pressures in other non-urban areas.

VISION 2050 Climate Policies: Under VISION 2050 there are 12 metropolitan planning policies meant to help reduce greenhouse gas emissions and prepare for climate change impacts. All studied alternatives would increase greenhouse gas emissions associated with buildings and waste. The growth levels of Alternatives 2 through 4 would reduce transportation emissions and Alternative 5 and the Preferred Alternative would slightly increase transportation emissions. The region-wide benefit of channeling development that might otherwise occur in peripheral areas of the city or region to targeted areas could serve to offset these impacts.

GMA and Countywide Planning Policy Requirements—Housing Element: Alternative 1, No Action, would meet GMA goals regarding compact growth served by multimodal transportation and municipal services. It would not meet new GMA requirements to amend the Housing Element to address new requirements in HB1220 regarding housing opportunities by income band and the removal of racially disparate impacts. Likewise, new housing targets by income band and special needs housing required in Countywide Planning Policies would not be met. Alternative 1 could perhaps conflict with Countywide Planning Policies that direct cities to provide a full range of affordable, accessible, healthy, and safe housing choices to every resident in King County as it would continue to limit the range of housing options in many areas of Seattle.

The a~~A~~ction alternatives would create a new housing element to meet new GMA requirements and address additional housing types and affordability levels. Alternatives 2 through 4 provide more housing types and support transit. Alternative 5 and the Preferred Alternative provide~~s~~ the greatest capacity for housing to meet affordability.

VISION 2050 and Countywide Planning Policies—Centers: Alternative 5 and the Preferred Alternative redesignate~~s~~ Ballard from a secondary urban center under Alternative 1 to a regional center under the new place types with the intent to seek approval as a Regional Growth Center under VISION 2050 and the PSRC Regional Centers process. Also, the 130th/145th Station Area would be designated an urban center (currently called an urban village under Alternative 1) with the intent to seek approval as a Countywide Center by the Growth Management Planning Council. Downtown, First Hill/Capitol Hill, South Lake Union, and Uptown would meet PSRC's future activity unit threshold for Metro Regional Growth Centers (RGCs) under all alternatives. University District and Northgate would be below PSRC's future activity unit threshold for Metro RGCs but be above the threshold for Urban RGCs under all alternatives as would Uptown under the Preferred Alternative which could result in redesignation from Metro to Urban RGC in the future.

~~The~~ Alternative 5 and the Preferred Alternative also expand~~s~~ existing urban centers and villages[5] to help facilitate infrastructure investments and be locations for facilitated environmental review.[6] The Preferred Alternative also splits 23rd and Union Jackson and Othello into two urban centers each to meet size thresholds. The boundary ~~expansions~~ revisions for ~~urban villages~~ centers are intended to allow them to comply with Countywide Center criteria for size and shape. Some current urban villages would not meet criteria as Countywide Centers by existing or planned activity units under Alternatives 1 through 5. Under the Preferred Alternative, all urban centers would meet King County's minimum future density

[5] Alternative 1~~,~~ No Action, would retain the City's Seattle 2035 urban village strategy and center/village designations—the existing urban centers and villages are categorized here according to the new place types proposed under the other a~~A~~lternatives ~~2–5~~ for comparison purposes only. Ballard would remain a "Hub Urban Village" under Alternative 1, would be called an "Urban Center" under the other a~~A~~lternatives ~~2 – 5~~, and would be redesignated as a Regional Center (as shown here) under Alternative 5 and the Preferred Alternative. See **Exhibit 2.1-1** in **Chapter 2** for a crosswalk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~A~~lternatives ~~2–5~~.

[6] This includes responding to SB 5412 which allows for an infill exemption for housing and mixed uses when considered in an EIS for a Comprehensive Plan. As part of this EIS process state agencies including WSDOT have been consulted and mitigation measures both current regulations and other proposed mitigation could apply to reduce impacts. See **Appendix C** for a list of codes providing mitigation for environmental impacts.

criteria for Countywide Centers, but Green Lake, Lake City, and Madison-Miller would still be outside the size threshold.

Equity & Climate Vulnerability Considerations

The action alternatives would respond to HB1220 affordable housing requirements as well as PolicyLink recommendations to allow "more housing types across the city with equitable access to wealth building and neighborhood opportunities."

The action alternatives allocate a similar or greater amount of growth to villages as the No Action Alternative. Additional growth over the No Action Alternative is planned in Neighborhood Residential areas or in corridors under Alternative 4) or distributed across single family areas with middle housing types (Alternatives 3 and 5 and the Preferred Alternative).

In addition, the action alternatives include new climate policies focused on reducing emissions from buildings and transportation and making the city more capable of withstanding the impacts of climate change.

130th/145th Station Area

The *130th and 145th Station Area Plan* and its vision and strategies would not be implemented under the No Action Alternative. Housing and job growth around both station areas would be minimal.

Alternatives 2 and 5 and the Preferred Alternative would implement the Station Area Plan with compact growth, services, and housing around the station and implement its strategies. The City would meet minimum standards for the Countywide Center of 130th Avenue Station Area by total area and activity units under Alternatives 2 and 5 and the Preferred Alternative but not under Alternative 1. However, existing activity units are slightly below countywide center designation criteria under the Preferred Alternative.

What are some solutions or mitigation for impacts?

Citywide

The action alternatives also propose new housing and place types to help meet affordable housing needs and address racially disparate impacts in support of the City's response to HB1220 (see **Section 3.8 Population, Housing, & Employment**). The action alternatives promote housing types in other bills relevant to middle housing including HB 1110 and accessory dwelling units in HB 1137.

~~If a~~ In this Final EIS, the Preferred Alternative ~~is developed, it should be~~is evaluated for conformity to state and regional plans and policies. Activity units would be met; however, some adjustments to center designation type or acreage may be appropriate ~~It may include reallocating growth assumptions in place types while being in the range of the studied Alternatives~~ (e.g., to meet Countywide Center or Regional Growth Center criteria). See **Section 3.6.2** regarding the Preferred Alternative.

130th/145th Station Area

See above.

With mitigation, what is the ultimate outcome?

No significant unavoidable adverse impacts are anticipated with respect to plans and policies. Inconsistencies with new regional plans and state requirements and the regional growth strategy under the No Action Alternative would be avoided through amendments to the Comprehensive Plan proposed under the action alternatives.

Summary of Thresholds

Exhibit 1.6-13 summarizes potential impacts based on the evaluation in **Section 3.8 Population, Housing, & Employment**.

Exhibit 1.6-13. Plans and Policies Thresholds of Significance

Metric	Threshold	Alt. 1	Alt. 2	Alt. 3	Alt. 4	Alt. 5	Pref.
	Inconsistency with adopted plans and policies: Growth Management Act (GMA).[1]	▼	—	—	—	—	—
	Inconsistency with adopted plans and policies: VISION 2050.[2]	▼	—	—	—	—	—
	Inconsistency with adopted plans and policies: Countywide Planning Policies.[3]	▼	—	—	—	▼	▼
	Inconsistency with adopted plans and policies: 130th/145th Station Area Plan.[4]	▼	—	▼	▼	—	—

Note: Impacts are considered either unavoidable adverse (▼▼), adverse but able to be mitigated (▼), impact but less than adverse (▽), limited or none (—), moderately positive (△), or positive (▲). The Preferred Alternative, and associated analysis in the notes, was added to this exhibit since the Draft EIS—no changes were made to the impact summary for Alternatives 1–5.

1 Alternative 1, No Action, would not meet new GMA requirements to amend the Housing Element to address new requirements in HB1220 regarding housing opportunities by income band and the removal of racially disparate impacts. It would not include a new climate element required under GMA.

2 The No Action Alternative would not include a new climate element to meet VISION 2050 policies nor address the findings of the equity evaluation of Seattle 2035 plan.

3 The No Action Alternative would not meet new housing targets by income band and special needs housing required in Countywide Planning Policies and would continue to limit the range of housing options in many areas of Seattle. The Admiral, Morgan, and Upper Queen Anne centers do not meet activity units for Countywide Centers (30 activity unit threshold) in Alternative 5 though their size would meet standards. Under the Preferred Alternative, all urban centers would meet King County's minimum future density criteria for Countywide Centers, but Green Lake, Lake City, and Madison-Miller would still be outside the size threshold.

4 Alternatives 1, 2, and 5 and the Preferred Alternative study the 130th/145th Station Area. Alternative 1 provides limited activity units near the transit investment. Alternatives 2 and 5 and the Preferred Alternative would establish more compact nodes or centers and fulfill the station area plan vision and strategies. Elements of these alternatives could be combined with Alternatives 1, 3, and 4 to integrate the subarea plan.

1.6.8 Population, Housing, & Employment

Source: City of Seattle. 2023.

How did we analyze Population, Housing, & Employment?

The EIS addresses population, employment, and housing, as well as the historical context of racial segregation that has contributed to today's demographic patterns. The evaluation uses city, state, and federal population, employment, and housing data and trends to identify current conditions and areas more at risk of displacement. It considers trends and buildable land capacity information and place types to address differences in the alternatives.

A primary focus of this analysis is the evaluation of how effectively each alternative achieves three objectives:

- Increase the supply, diversity, and affordability of market-rate housing.
- Increase the supply of income-restricted housing.
- Reduce residential displacement.

What impacts did we identify?

Seattle would continue to grow in population and housing supply under all ~~five~~ alternatives; the housing supply could have a different mix of types and affordability. There is a potential for displacement of residents under any of the alternatives though they vary in type and degree.

Seattle's total employment is expected to grow by 158,000 jobs in all alternatives. In all alternatives, a majority of employment growth is expected to occur in ~~urban~~ regional centers such as Downtown, South Lake Union, University District, and Northgate as well as manufacturing industrial areas. The greatest variation across alternatives is in the distribution of growth in the remaining place types. For instance, job growth in neighborhood centers, ~~and~~ frequent transit corridors, and urban neighborhood has the potential to provide more neighborhood-serving businesses and services in areas of the city that currently have few options. The Preferred Alternative ~~2~~ would focus about 14~~5~~% of job growth in these place types~~new neighborhood centers~~, higher than all other alternatives. It also focuses the most growth in residential urban centers. The result is a pattern of job growth that is more dispersed across the city than expected under No Action and the other action alternatives.~~Alternative 5 would distribute about 5% of jobs across neighborhood centers and corridors combined. Alternatives 1, 3, and 4 offer relatively less job growth in these areas~~

What is different between the Alternatives?

Citywide

Supply, Diversity & Affordability

All action alternatives are expected to increase total housing supply more than No Action. The Preferred Alternative would increase total supply by 120,000 units. It would also result in the greatest amount of non-stacked housing (such as townhomes) compared to other alternatives. In Alternative 2 (Focused) and 5 (Combined), a greater share of new housing would be in stacked housing such as apartment buildings. ~~Alternative 3 (Broad) would produce the greatest diversity of housing types, particularly non-stacked housing types such as detached homes, ADUs, 2/3/4/6-plexes, and townhouses.~~ See **Exhibit 1.6-14**.

Exhibit 1.6-14. Projected Net New Housing Units by Housing Type

	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5	Preferred
Stacked Housing						
Condominiums	2,261	2,977	3,730	3,127	3,626	3,322
Apartments	73,109	93,815	76,652	88,662	110,079	91,106
Non-Stacked Housing						
>2,000 sq. ft.	1,389	698	1,111	1,111	1,111	4,132
>1,200 – 2,000 sq. ft.	648	533	4,260	1,578	1,128	14,766
≤ 1,200 sq. ft.	2,593	1,977	14,247	5,522	4,056	6,675
Total Net New Housing	**80,000**	**100,000**	**100,000**	**100,000**	**120,000**	**120,000**

Note: Non-stacked housing refers primarily to unit types expected to be built in Urban Neighborhood Residential zones. These may include detached homes, attached, or detached accessory dwelling units, townhomes, or other low to moderate density formats. All of these units could be sold separately or as condominiums to support homeownership opportunities. The Preferred Alternative, and associated analysis in the notes, was added to this exhibit since the Draft EIS—no edits were made to Alternatives 1–5.
Sources: City of Seattle, 2024; BERK, 2024.

Despite its higher overall housing growth estimate, Alternative 2 would produce fewer units that could be owner-occupied compared to Alternative 1 (No Action) due to its emphasis on zones that allow multifamily housing. The Preferred Alternative and Alternative 3 would produce the most units that could be owner-occupied due to ~~its~~ their emphasis on growth in small-scale detached and attached that are typically offered for sale. Over time, changes in consumer preference, housing costs, or laws governing condominium construction could result in changes in the percentage of units that are owner-occupied.

In general, the action alternatives would be expected to reduce competition for housing compared to No Action due to the increased housing growth that they accommodate. Alternative 5 and the Preferred Alternative would result in the largest increase in housing supply and therefore have the greatest impact on reducing overall market housing cost pressures for both new and older units.

Income Restricted Units

Seattle has two programs that support the production of new income- and rent-restricted affordable housing through developer contributions or incentives: Mandatory Housing Affordability and the Multifamily Tax Exemption. Under all alternatives the city is expected to gain additional income-restricted units through these programs.

Mandatory Housing Affordability (MHA): MHA is a program to support the development of new income- and rent-restricted affordable housing in Seattle. To achieve the goal of providing affordable housing and mitigate the impacts of new development, new commercial, residential, or live-work projects in designated zones must contribute to affordable housing. If the City continues the current MHA program, Alternative 5 would most substantially increase the

number of new income-restricted units produced compared to No Action.[7] The Preferred Alternative would have a smaller positive impact (somewhat lower than Alternatives 2 and 4) and Alternative 3 would have no impact. See **Exhibit 1.6-15.**

Exhibit 1.6-15. Projected New Income-restricted Affordable Units through MHA-Residential (Excluding Neighborhood Residential Zones for all Alternatives)

	Alternative 1: No Action	Alternative 2: Focused	Alternative 3: Broad	Alternative 4: Corridor	Alternative 5: Combined	Preferred Alternative
Performance Units	1,131	1,614	1,131	1,400	1,787	1,524
Payment Units	9,891	13,544	9,891	13,142	15,505	12,338
Total	**11,022**	**15,158**	**11,022**	**14,542**	**17,293**	**13,862**

Note: This exhibit was added in Chapter 1 since the Draft EIS. These projections assume that the city will not apply MHA requirements in Neighborhood Residential zones. Assumption was 75% payment for stacked flats and 100% payment for attached and detached housing based roughly on recent development. The Preferred Alternative was added to this exhibit since the Draft EIS—no edits were made to Alternatives 1–5.
Source: City of Seattle, 2024.

~~Considering the current MHA requirements~~If the City applies MHA requirements in some or all Neighborhood Residential zones, Alternative~~s 2, 4, and~~ 5 would most substantially increase the number of new income-restricted units produced, compared to No Action, while Alternatives 2, 3, and 4 would have a smaller impact. The City ~~is~~ was considering whether to extend MHA requirements to include development in some or all Neighborhood Residential zones (with a place type name of urban neighborhood under ~~action a~~Alternatives 2-5) but is not considering MHA for Neighborhood Residential zones in the Preferred Alternative.~~, t~~ This would result in a higher total number of potential affordable units produced ~~for the action a~~in Alternatives 2-5, compared to a scenario where Neighborhood Residential zones are excluded. See **Exhibit 1.6-16.**

Exhibit 1.6-16. Projected New Affordable Units through MHA-Residential (Including Neighborhood Residential Zones where Updated in Alternatives 1-5, Preferred Alternative Does Not Apply MHA to Neighborhood Residential Zones)

	Alternative 1: No Action	Alternative 2: Focused	Alternative 3: Broad	Alternative 4: Corridor	Alternative 5: Combined	Preferred Alternative
Performance Units	1,131	1,614	1,163	1,400	1,800	N/A
Payment Units	9,891	13,544	13,066~~29~~	13,142~~37~~	16,758~~41~~	N/A
Total	**11,022**	**15,158**	**14,229~~191~~**	**14,542~~537~~**	**18,558~~41~~**	**N/A**

Note: With the exception of the Preferred Alternative, t~~T~~hese projections assume that the City will apply MHA requirements in Neighborhood Residential zones. The Preferred Alternative was added to this exhibit since the Draft EIS. Corrections made to Alternatives 1–5 to match the corresponding analysis in Chapter 3 are shown in tracks.
Source: City of Seattle, 2024~~3~~.

[7] NR zones currently are one of the only areas of Seattle where MHA requirements do not apply to residential development.

Multifamily Tax Exemption (MFTE): MFTE is a developer incentive that provides a tax exemption on eligible multifamily housing in exchange for setting aside a portion of units as income- and rent-restricted affordable housing. This exemption lasts 12 years, at which point the property owner can renew the tax exemption and affordability requirements or rent those units at market rate. Therefore, new affordable units are added to Seattle's housing supply each year as developers opt into the program, while other affordable units come offline when property tax exemptions expire. **Exhibit 1.6-17** shows projections of net new affordable housing units produced through MFTE under each alternative. These projections are based on current trends in use of the program, and the expected new housing production by zone under each alternative. Alternatives 1 and 3 are not expected to increase net MFTE units overall as the number of new affordable units produced with MFTE would equal the number expiring and returning to market rate. Alternatives 2, 4, ~~and~~ 5, and the Preferred Alternative expect modest growth in the total supply of MFTE units.

Exhibit 1.6-17. Projected Net Gain of Affordable Housing Units through MFTE

	Alternative 1: No Action	Alternative 2: Focused	Alternative 3: Broad	Alternative 4: Corridor	Alternative 5: Combined	Preferred Alternative
Total	**0**	~~600~~**725**	**0**	~~450~~**636**	~~525~~**1,129**	**865**

Note: The Preferred Alternative was added to this exhibit since the Draft EIS. Based on calculation errors, edits to correct errors for Alternatives 2, 4, and 5 are shown in tracks.
Source: City of Seattle, 2024~~3~~.

Demolitions and Displacement: Between 2009 and 2022, more than 600 housing units were lost due to demolition each year in Seattle. Demolition of older housing is expected to continue under all alternatives as lots with older homes are redeveloped with newer and higher-density housing. However, the number of units demolished is expected to vary widely by alternative, from 5,030 units in Alternative 1 to ~~9,148~~11,086 units in the Preferred Alternative ~~3~~, as shown in **Exhibit 1.6-18**. This table also shows the ratio of net new units per demolished unit. Here Alternatives 1 and 2 have the highest ratio, while the Preferred Alternative and Alternative 3 have~~s~~ the lowest.

Exhibit 1.6-18. Projected Housing Units Demolished by EIS Analysis Area and Alternative

Area	Alternative 1: No Action	Alternative 2: Focused	Alternative 3: Broad	Alternative 4: Corridor	Alternative 5: Combined	Preferred Alternative
Area 1	871	1,192	1,662	1,330	1,758	2,970
Area 2	1,103	1,391	2,636	2,202	2,274	2,657
Area 3	389	534	484	473	565	923
Area 4	810	810	810	810	810	797
Area 5	685	929	735	745	915	1,213
Area 6	565	767	1,404	1,070	1,374	1,492
Area 7	80	85	48	87	140	144

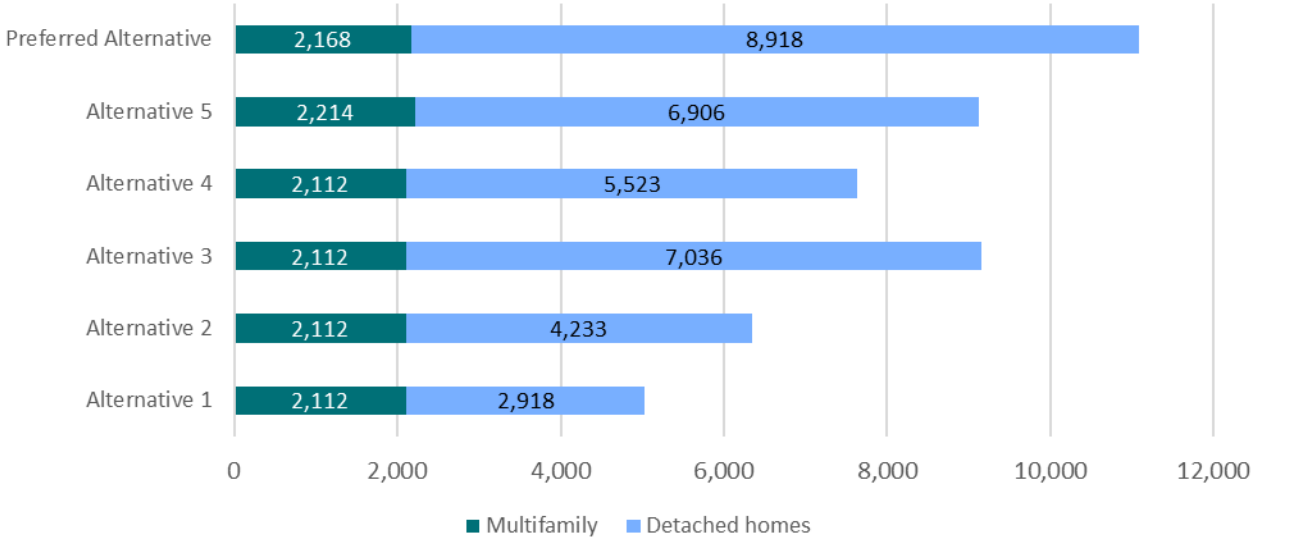
Area	Alternative 1: No Action	Alternative 2: Focused	Alternative 3: Broad	Alternative 4: Corridor	Alternative 5: Combined	Preferred Alternative
Area 8	527	637	1,369	918	1,284	890
Total units demolished	**5,030**	**6,345**	**9,148**	**7,635**	**9,120**	**11,086**
Total net new units	80,000	100,000	100,000	100,000	120,000	120,000
Ratio of net new units to units demolished	**15.9**	**15.8**	**10.9**	**13.1**	**13.2**	**10.8**

Note: The Preferred Alternative was added to this exhibit since the Draft EIS—no edits were made to Alternatives 1–5.
Source: City of Seattle, 2024~~3~~. BERK, 2024~~3~~.

There is almost no variation in the number of multifamily units demolished across alternatives. However, there is variation in the amount of detached homes projected to be demolished~~, with the exception that Alternative 5 is expected to result in slightly higher demolitions~~. This is because the alternatives vary ~~primarily~~ in the amount of growth expected in new place types located where detached homes currently predominate. As a consequence, most of the demolitions are expected to be older detached homes, and there is substantial variation among the alternatives in the total number of detached homes expected to be demolished. The Preferred Alternative is expected to result in the most detached home demolitions and most demolitions overall. See **Exhibit 1.6-19**.

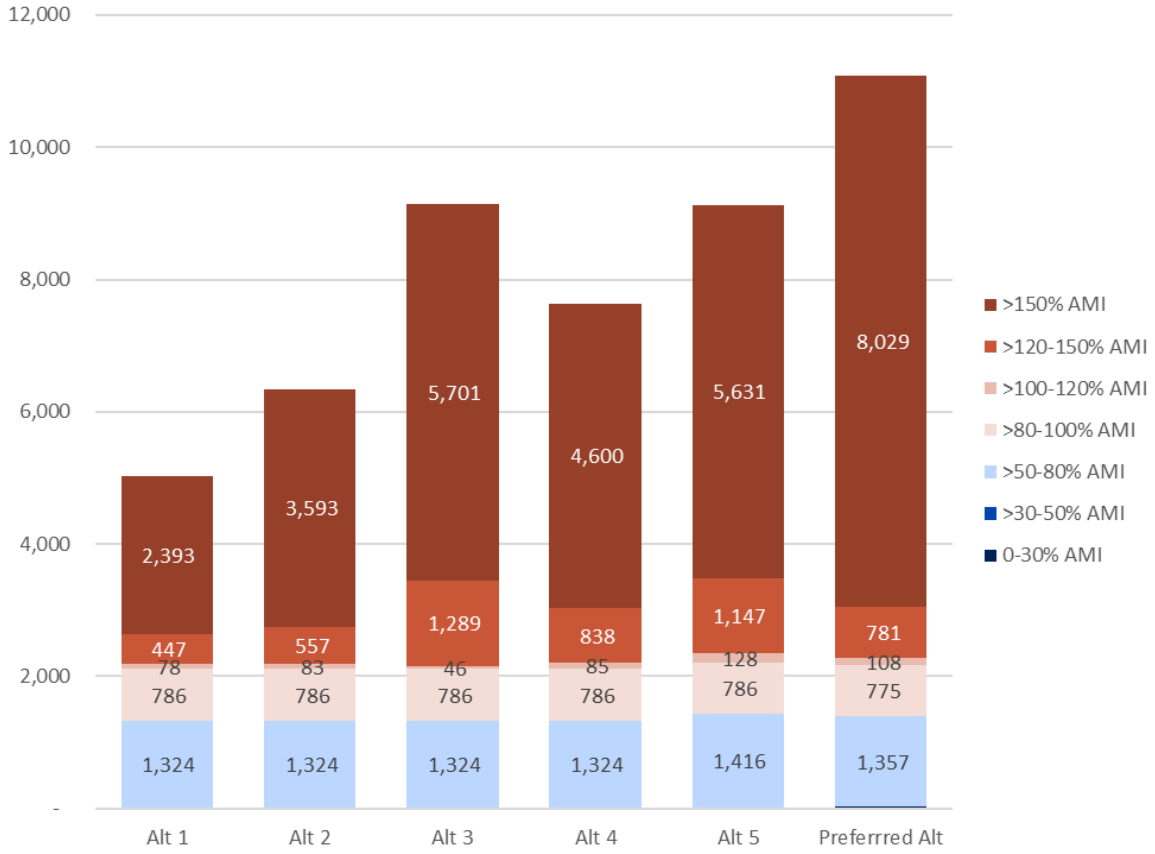
Exhibit 1.6-20 presents projections of housing lost due to demolition by affordability level. This analysis shows that all alternatives are expected to result in the demolition of a similar number of units affordable at 120% AMI or below. The alternatives vary primarily in the number of detached homes demolished, which tend to be affordable only to households with incomes above 120 or 150% AMI.

Exhibit 1.6-19. Projected Housing Units Demolished by Housing Type and Alternative



Note: The Preferred Alternative was added to this exhibit since the Draft EIS—no edits were made to Alternatives 1–5.
Sources: City of Seattle, 2024~~3~~; BERK, 2024~~3~~.

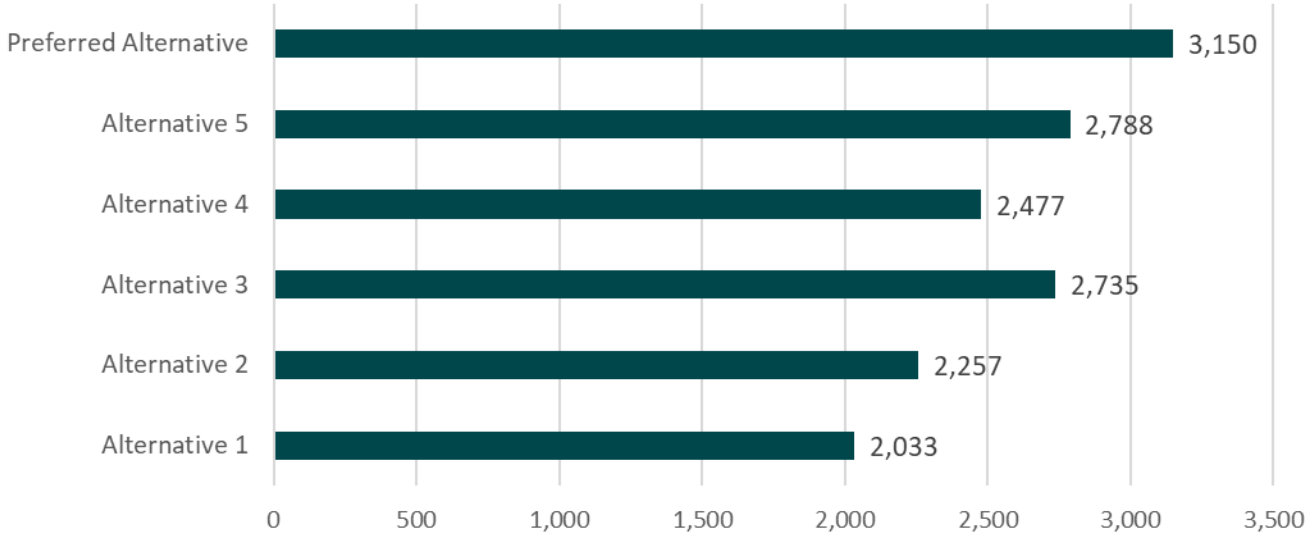
Exhibit 1.6-20. Projected Housing Units Lost to Demolition by Affordability Level



Note: No units from affordable at 30-50% AMI are projected to be demolished in any alternative. A very small number of 0-30% AMI units (2-~~12~~40) could be demolished. These counts are not shown in the chart. The Preferred Alternative was added to this exhibit since the Draft EIS—no edits were made to Alternatives 1–5.
Sources: City of Seattle, 2024~~3~~; BERK, 2024~~3~~.

Estimating the number of renter households residing in units projected to be demolished is one way to conservatively estimate how many households could be physically displaced in each alternative. See **Exhibit 1.6-21**. ~~Alternative 5t~~The Preferred Alternative would be expected to result in the greatest potential for renter households displaced due to demolitions, while Alternative 1 would be expected to see the fewest. Alternatives 2 and 5 are expected to create the most new affordable units per unit demolished as described in **Chapter 3**.

Exhibit 1.6-21. Renter Households Physically Displaced by Alternative



Note: The Preferred Alternative was added to this exhibit since the Draft EIS—no edits were made to Alternatives 1–5.
Sources: City of Seattle, 2024~~3~~; BERK, 2024~~3~~.

Equity & Climate Vulnerability Considerations

There is a housing affordability crisis in Seattle that is disproportionately impacting communities of color and lower income residents. Rapidly increasing rents are contributing to extreme housing cost burden, economic displacement, and housing insecurity. Physical displacement is much less common than economic displacement, but its impacts can be devastating for affected households. And when specific racial or ethnic communities are disproportionately impacted by economic and physical displacement, this contributes to the process of cultural displacement.

Skyrocketing ownership housing costs also have equity related impacts. A lack of moderately priced ownership housing options prevents pathways to homeownership and wealth generation for both low and moderate-income households. Achieving homeownership, for moderate-income households, often requires moving outside of Seattle to find more affordable ownership housing options. However, they may need to contend with higher transportation costs due to increased car dependency due to living further from jobs, transit, and services.

- Alternative 1: Although there would continue to be new housing built over the next 20 years, the rate of new housing production would likely continue to fall far short of demand, contributing to rising housing costs and disproportionately inequitable outcomes for low-income and BIPOC community members.
- Alternative 2: Except for Alternative 5, Alternative 2 would provide the greatest benefit for low-income renter households. This is due to the emphasis on increased rental housing production and its potential impact on moderating rental housing cost escalation as well as increased affordable housing production through MHA. However, Alternative 2 would provide the least benefit for moderate-income households seeking to access the homeownership market and associated wealth generation opportunities.

- Alternative 3: Except for No Action, Alternative 3 would provide the least benefit for low-income renter households. That is because rental housing supply and new affordable housing through MHA would only see modest increases compared to No Action. However, Alternative 3 would provide the greatest benefit for moderate income-households seeking to access the homeownership market and associated wealth generation opportunities.
- Alternative 4: Compared to No Action, Alternative 4 would provide benefits for both low-income renter households as well as moderate-income households that seek to access the homeownership market and associated wealth generation opportunities. This is due to an expected increase in rental housing supply, affordable housing production through MHA, and supply of housing types that can be sold to homeowners.
- Alternative 5: Alternative 5 would provide the greatest benefit for low-income renter households among all alternatives due to its impact on increasing rental housing supply and new affordable housing through MHA and MFTE. Compared to No Action, it would also provide benefits for moderate income-households seeking to access the homeownership market and associated wealth generation opportunities. This is due to the increased supply and diversity of housing types that can be sold to homeowners. However, ~~both~~ Alternatives 3 and 4 and the Preferred Alternative are expected to produce more ownership housing than Alternative 5.
- Preferred Alternative: The Preferred Alternative would provide a similar but slightly lower benefit for low-income renter households as Alternative 5 due to its impact on increasing rental housing supply and new affordable housing through MHA and MFTE. This alternative would provide the greatest benefit for moderate income-households seeking to access the homeownership market and associated wealth generation opportunities. This is due to the increased supply and diversity of housing types that can be sold to homeowners.

130th/145th Station Area

Alternative 1: Both housing and employment growth would be much lower in the station area compared to the other Alternatives. This would limit the number of households and businesses that can benefit from nearby access to the light rail stations. It would also limit the variety of housing choices available.

Alternative 2: Alternative 2 would support transit-oriented development in these station areas at higher levels of density than allowed under current zoning. It is expected to more than double the number of new housing units compared to No Action and increase overall housing supply more than any alternative other than Alternative 5. This would allow many more households to live near light rail transit.

Alternative 5: This Alternative would create a new urban ~~village~~ center around the NE 130th St station area. This change would support transit-oriented development and the most housing and job growth compared to the other alternatives, except the Preferred Alternative, which will result in the same housing and job growth.

Preferred Alternative: The Preferred Alternative would create a new urban center around the NE 130th St station area that would support transit-oriented development. The 130th Station Area would see an increase in housing and job growth under the Preferred Alternative, similar to but slightly lower than Alternative 5.

What are some solutions or mitigation for impacts?

Although not required to address identified impacts, the City could pursue the following kinds of actions to address possible population, employment, and housing conditions.

- ~~**Implement MHA requirements in Neighborhood Residential zones:** The City could apply MHA requirements through zoning changes in Neighborhood Residential zones. This would increase affordable housing production in Alternatives 3 and 5, which contemplate allowing a greater amount and variety of housing in Neighborhood Residential zones.~~**Develop an acquisition strategy for natuarally occurring affordable housing.**
- **Increase funding for programs combating displacement:** To address the potential for residential, commercial, and cultural displacement under any alternative, the City could pursue various actions that support the stability and retention of existing households, and the preservation and creation of new, cultural institutions and businesses. Examples of potential anti-displacement actions include:
  - Increasing funding for Seattle's Equitable Development Initiative (EDI) to expand the ability of community organizations to acquire and develop property in neighborhoods at high risk of displacement.
  - Supporting low-income homeowners to add housing on their property to stay in place and build wealth. Homeowners who have low or fixed incomes may struggle with the rising costs of property ownership, including taxes and maintenance costs, and may also face challenges to adding housing to their property that could generate income or meet their household needs despite current or future zoning capacity that allows additional density. The City could fund programmatic efforts to help homeowners overcome awareness, financing, design, permitting, or other barriers.
  - Strengthen the Office of Economic Development's (OED) small business support programs. OED has provided a range of support services for small businesses, including access to capital, storefront repair, a stabilization fund pilot, and a tenant improvement fund pilot. Resources for these or similar programmatic efforts could mitigate potential commercial displacement pressure.
  - Establish and fund a program that supports tenant or community ownership of rental housing when it becomes available for purchase.
- **Strengthen relocation assistance programs:** The Tenant Relocation Assistance Ordinance and Economic Displacement Relocation Assistance provide relocation assistance to low-income households displaced due to removal or alteration of their housing or increasing housing costs. The City could pursue policy or funding changes that would increase the number of households receiving assistance or the amount of assistance received.

- **Density bonuses:** The City could allow projects that set aside a significant portion of their units as income-restricted affordable housing to receive extra height or floor area.

With mitigation, what is the ultimate outcome?

Over time, additional growth and development will occur in Seattle, and much of this growth will occur through redevelopment. The alternatives vary based on the amount, types, and geographic pattern of existing housing and businesses that may be demolished to make way for new growth. While this can contribute to the risk of physical displacement, that risk is not significantly higher in the action alternatives. Moreover, the benefits in terms of reduced economic displacement pressure and increased production of affordable units offered by the action alternatives outweigh any increased risk of physical displacement. Therefore, no significant unavoidable adverse impacts to population, employment, or housing are expected under any alternative.

Summary of Thresholds

Exhibit 1.6-22 summarizes potential impacts based on the evaluation in **Section 3.8 Population, Housing, & Employment**.

Exhibit 1.6-22. Population, Housing & Employment Summary of Thresholds of Significance

Metric	Threshold	Alt. 1	Alt. 2	Alt. 3	Alt. 4	Alt. 5	Pref.
☒ Equity & Climate	Increase the supply of market-rate housing.[1]	—	△	△	△	▲	▲
☒ Equity & Climate	Increase the affordability of market-rate housing.[2]	—	△	△	△	▲	▲
☒ Equity & Climate	Increase the diversity of market-rate housing.[3]	—	△	▲	△	▲	▲
☒ Equity & Climate	Increase the supply of income-restricted housing.[4]	△	▲	△	▲	▲	▲
☒ Equity & Climate	Reduce residential economic displacement.[5]	▽	△	△	△	▲	▲
☒ Equity & Climate	Reduce residential physical displacement.[6]	—	▽	▽	▽	▽	▽

Note: Impacts are considered either unavoidable adverse (▼▼), adverse but able to be mitigated (▼), impact but less than adverse (▽), limited or none (—), moderately positive (△), or positive (▲). The Preferred Alternative was added to this exhibit, and associated analysis in the notes, since the Draft EIS—no changes were made to the impact summary for Alternatives 1–5.

1 Total housing supply will grow under all alternatives. Alternative 5 and the Preferred Alternative would produce the most new units.

2 In general, the action alternatives would be expected to reduce competition for housing compared to No Action due to the increased growth that they accommodate. Alternative 5 and the Preferred Alternative provides the greatest amount of new supply, and therefore would be expected to have the greatest impact on reducing market housing cost pressures. These impacts would be expected across the entire market housing supply, both new and older units.

3 Based on the different place types, Alternative 3 would produce the greatest range of new housing types—detached single family, missing middle, multiplex, apartments. Alternative 5 and the Preferred Alternative have~~has~~

the greatest changes to place types including increasing the size of centers and adding new centers. This would also increase the diversity of housing options available.
4 Most affordable housing production is through the MHA program, and MHA requirements vary geographically. Alternatives 2, 4, and 5 and the Preferred Alternative include the greatest amount of growth in zones that generate MHA performance and payment units.
5 Alternative 5 and the Preferred Alternative are~~is~~ expected to have the greatest impact on reducing economic displacement pressure because ~~it~~ they anticipates the largest increase in housing supply.
6 Alternative 3 with the greatest redevelopment in urban neighborhood areas and Alternative 5 and the Preferred Alternative with the greatest total potential units have the highest potential for physical displacement due to the demolition of existing homes. In Alternatives 1, 2, 4, and 5 and the Preferred Alternative the number of new affordable units substantially exceeds the number of units demolished. In Alternative 3, new affordable units only slightly exceed demolitions, in part because of the assumption that MHA would not apply in NR zones. Alternatives 2 and 5 and the Preferred Alternative are expected to create the most new affordable units per unit demolished.

1.6.9 Cultural Resources

How did we analyze Cultural Resources?

The Cultural Resources evaluation addresses historic-period architectural resources and precontact and historic-period archaeological resources. It is based on a literature review using State and City registers and spatial data, and review by liaisons representing different cultures and expertise. Impacts to cultural resources in the study areas from the No Action Alternative, ~~and~~ four action alternatives, and the Preferred Alternative, were identified by assessing potential for both above- and belowground changes.

Impacts of the alternatives on cultural resources are considered significant if they result in:

- Substantial changes to or alteration of features or characteristics, or loss (removal or demolition) of a cultural resource that prevent their eligibility for inclusion as a designated Seattle Landmark (SL), or inclusion in the National Register of Historic Places (NRHP), National Historic Landmark (NHL) program, or the Washington Heritage Register (WHR).
- More than a moderate adverse impact (potential loss of or alterations to the physical evidence or tangible evidence of cultural history) to Culturally Important Resources (CIR), which for the purposes of this EIS are important to certain cultural groups or communities, whether or not they are listed or eligible for the SL, NRHP, or WHR.

Resources that have been officially determined not eligible for these registers or considered CIR will not be adversely impacted by the proposed alternatives.

What impacts did we identify?

All studied alternatives have the potential to affect districts, sites, landscapes, or buildings, structures, or objects (BSOs) that have been designated as an SL or listed in the NRHP and WHR, and those resources that have been determined eligible for listing in the NRHP. Additionally, the studied alternatives could potentially affect the numerous BSOs and

unidentified archaeological sites that have yet to be surveyed and assessed for potential eligibility for listing in the registers.

Since development may occur in any location in the study area under any alternative, it is possible that cultural resources could be impacted under each alternative. Changes to zoning that allow a wider range of residential and/or commercial growth could spur redevelopment in those locations. This could occur, for example, where the focused growth within neighborhood centers would allow for a wide range of housing types and commercial space or within Neighborhood Residential zones where the broad expansion of housing options would allow for and possibly incentivize increased density on larger lots throughout the study area. Even where there are no formally designated historic properties, there are numerous properties with historic-period buildings, many of which have never been formally surveyed and evaluated for eligibility but could potentially qualify for designation as an SL or listing in the NRHP. Many are located in an area with a High or Very High Risk of archaeological resources.

Demolition and construction projects could require substantial below-groundwork, thus negatively and irreversibly impacting below-ground archaeological and cultural resources. DAHP's archaeological predictive model, used to establish probabilities for precontact cultural resources, depicts much of the land within the study area as within a High or Very High Risk area, primarily because of proximity of Puget Sound, Salmon Bay, Lake Union, Elliott Bay, and the Duwamish River, and the use-history throughout the precontact and historic periods.

Analysis indicates that all alternatives have the potential to affect historic and cultural resources through development/redevelopment in historically marginalized neighborhoods in the study areas.

What is different between the Alternatives?

Citywide

Alternative 1: Redevelopment and development projects due to market pressures under Alternative 1 (No Action) would continue to affect cultural resources, with such impacts as alteration, demolition, damage, or destruction. Alternative 1 includes no additional protections or improvements in planning for consideration of impacts to cultural resources.

Alternatives 2 – 4: Alternatives 2 through 4 would allow more housing than Alternative 1 but still propose most growth in centers, but each would emphasize different locations for additional housing choices: Alternative 2—growth in distributed nodes called neighborhood centers, Alternative 3—middle housing distributed throughout the urban neighborhood place type, and Alternative 4 focusing more attached housing in corridors. While most growth will be in larger centers the additional growth would increase the probability of inadvertent discovery of below ground archaeological and cultural resources as compared to Alternative 1 because of substantial foundation work needed for multi-story buildings.

- **Alternative 2:** Some new neighborhood centers contain or abut listed historic properties or recorded archaeological resources, or contain mapped resources, such as within the Loyal Heights and Upper Fremont (NW Seattle), Wedgwood and Sand Point Way (NE Seattle), Magnolia and Nickerson (Queen Anne/Magnolia), Montlake, Madrona, and Squire Park (Capitol Hill/Central District), Alki, North Delridge/Youngstown, and Gatewood (W Seattle), and Georgetown (Duwamish) Neighborhood Centers.
- **Alternative 3:** Insufficient formal survey and inventory has been undertaken in many of the urban neighborhood areas across the city, leaving broad swaths of historic-period single-family and small-scale multi-family residential buildings as-yet unidentified or evaluated, and thus vulnerable to impacts from development. There are designated SLs, NRHP- and WHR-listed properties and mapped resources sensitivity areas (e.g., High to Very High Risk of archaeological and cultural sensitivity) across the city within the NR zones, such as Dunn Gardens (NRHP-listed) (NW Seattle), James and Pat Chiarelli House (designated SL and NRHP-listed) and the Julian and Marajane Barksdale House (NRHP-listed) (NE Seattle), Fort Lawton Landmark District (designated SL) (Queen Anne/Magnolia), Harvard-Belmont Historic District (designated SL and NRHP-listed) and Frink Park (NRHP-listed) (Capitol Hill/Central District), Schmitz Park Bridge (designated SL and NRHP-listed) (W Seattle), and Joseph Kraus House (designated SL and NRHP-listed) (SE Seattle).
- **Alternative 4:** Under Alternative 4 growth will occur in the areas that contain or abut listed historic properties or recorded archaeological resources, or contain mapped resources sensitivity areas (e.g., High to Very High Risk of archaeological and cultural sensitivity), possibly impacting such cultural resources as the John B. Allen School (designated SL and NRHP-listed) and the Christ the King Catholic Church (CIR) (NW Seattle), the Bryant Elementary School (designated SL) and the Henry Owen Shuey House (designated SL and NRHP-listed) (NE Seattle), Magnolia Public Library (designated SL and NRHP-listed) and the (former) Seventh Church of Christ (designated SL) (Magnolia/Queen Anne), Samuel Hyde House (designated SL and NRHP-listed), Volunteer Park (designated SL and NRHP-listed), Millionaire's Row Historic District (NRHP-listed), Moore Mansion and Bordeaux House (designated SLs) (Capitol Hill/Central District), Fauntleroy Community Church and YMCA (designated SL) (W Seattle), Hat 'n Boots (designated SL) (Duwamish), and Van Asselt School and Old Fire Station #33 (designated SLs), Ota Residence (CIR), and the Jimmie and Betty Eng House (NRHP-listed) (SE Seattle).

Alternative 5: In addition to the Preferred Alternative, Alternative 5 will allow the largest increase in supply and diversity of housing throughout the city. Existing regional centers and urban centers would gain up to 80,000 housing units, while other areas would see up to 40,000 additional housing units in new housing types. It combines the strategies in Alternatives 2, 3, and 4, and expands the boundaries of the city's existing urban centers and urban villages. Alternative 5 applies the proposed land-use concepts of all alternatives, which could incentivize development to increase floor area and height limits, allowing for the construction of dense, multi-story buildings.

Preferred Alternative: The Preferred Alternative combines the strategies of all the Alternatives and will allow for the largest increase in supply and diversity of housing across the city, along with Alternative 5. Similar to Alternative 5, Ballard would become a regional center, and expansions of regional and urban centers will take place, such as at the First Hill/Capitol Hill Regional Center and 23rd & Union-Jackson Urban Center. Similar to Alternatives 2 and 5, the Preferred Alternative has 30 new neighborhood centers, including 5 that are shifting or expanding in comparison to Alternatives 2 and 5, including North Magnolia, High Point, Mid Beacon Hill, Upper Fremont, and Hillman City. Like Alternative 5, most housing growth will be in Area 1 Northwest Seattle, and Area 2 Northeast Seattle, while Area 7 Duwamish, will receive the least housing growth. Growth will take place in neighborhood centers, urban neighborhoods, corridors, select regional centers, and select urban centers. The additional growth would increase the probability of inadvertent discovery of below ground archaeological and cultural resources as compared to Alternative 1 because of substantial foundation work needed for multi-story buildings. As noted above, growth will occur in areas that contain or abut listed historic properties or recorded archaeological resources, or contain mapped resources sensitivity areas (e.g., High to Very High Risk of archaeological and cultural sensitivity), possibly impacting the numerous designated SL, CIRs, and NRHP-listed cultural resources in those areas across the city (noted in Alternatives 2, 3, and 4 above).

Development or redevelopment is likely to impact cultural resources. The main differences among the alternatives are the level of residential development. Considering acres that may be affected by residential development in **Exhibit 3.3-4** and **Appendix G**, the total acres affected are highest under the Preferred Alternative overall, followed by Alternative 3 and Alternative 5. Generally, more development/redevelopment could impact more cultural resources. However, under any of the action alternatives there could be similar impacts to cultural resources due to variability in the location and timing of redevelopment, lack of full cultural surveys or assessments of historic resources, development exempt from SEPA review, and individual development applicant preferences regarding historic preservation.

Equity & Climate Vulnerability Considerations

The City's equity and climate change performance metrics did not specifically address cultural resources. However, Seattle's approach to evaluating and identifying cultural resources did include experts with local community groups to identify culturally important resources (CIRs), in addition to common channels of federal, state, and city inventories and registers. This resulted in identification of black and Hispanic commemorative and historic sites in several areas, mapped and described in **Section 3.9 Cultural Resources**.

Studies by the National Trust for Historic Preservation (NTHP) have noted that while rezoning and redevelopment can address some environmental justice concerns such as poor air and water quality, soil contamination, noise pollution, climate change, and unsafe, disconnected, and inaccessible neighborhoods, some of the land use strategies could also lead to adverse impacts such as the loss of historic and CIRs that have yet to be identified and documented within these communities (Canaan et al. 2021:54–55; NTHP 2021:10; Rypkema 2004).

The state and city SEPA rules allow some minor projects to be exempt from SEPA review. SEPA exemptions vary by location, zone, and use, and by residential density goals. SEPA allows some non-residential and mixed-use exemptions, as well. Some exempted projects are not subject to the same review and could impact cultural resources.

130th/145th Station Area

Under all studied alternatives, development projects would affect cultural resources, with such impacts as alteration, demolition, damage, or destruction.

Alternative 1: Some 3-8 story residential buildings would be allowed near the station consistent with current zoning. The blocks around 130th Street would see an additional 194 housing units and 646 units would be developed at 145th Street. Redevelopment and development projects due to market pressures under Alternative 1 would continue to affect cultural resources, with such impacts as alteration, demolition, damage, or destruction. Impacts would be similar to the Citywide summary above.

Alternative 2: In the 130th/145th Station Area, Alternative 2 would designate three neighborhood centers near 130th Street and Roosevelt Way, 125th Street and 15th Avenue, and 145th Street and 15th Avenue, clustering denser, taller buildings and growth near transit. Development would be more mixed use near the 145th Station Area (with NC3) compared to Alternative 1. Building heights would be allowed up to 75 feet. The area would see 2,208 new housing units and 979 new jobs. Redevelopment and development projects under Alternative 2 could affect cultural resources, with such impacts as alteration, demolition, damage, or destruction.

Alternative 5: Alternative 5 would create an expansive urban center (previously urban village) at the Sound Transit light rail station along both sides of I-5, with zoning including low-rise residential, mid-rise multifamily, and neighborhood commercial (NC2 and NC3), linking Pinehurst's existing commercial area to an expanded residential/mixed-use area near the station. Development would be denser than Alternative 2, with more mixed-use, retail, and commercial buildings, and a wider variety of housing types. Building heights in the urban center would be allowed up to 95 feet, while in the nodes and corridors, building heights could be up to 80 feet. The urban center at NE 130th Street would see the highest residential growth of up to 1,644 housing units, while the neighborhood center at 145th Street and 15th Avenue would receive up to 1,059 housing units. The Station Area would see up to 1,004 new jobs.

Preferred Alternative: Like Alternative 5, the Preferred Alternative will allow for a large urban center along both sides of I-5 at the NE 130th Street Light Rail Station area, with zoning that includes low-rise residential, mid-rise residential, and neighborhood commercial (NC2 and NC3). Under the Preferred Alternative, this urban center would see the highest residential and job growth. The 145th Station Area would be designated as a neighborhood center and would see similar zoning, growth in housing units, and somewhat less job growth. Redevelopment and development projects under the Preferred Alternative could affect cultural resources, with such impacts as alteration, demolition, damage, or destruction. Like Alternative 5, taller building

heights could increase the probability of inadvertent discovery of below ground archaeological and cultural resources because of substantial foundation work needed for multi-story buildings.

Examples of mitigation for impacts for architectural resources are detailed in **Section 3.9.3~~3.7.3~~**.

- Mitigation includes a combination of protection and incentives, e.g., adaptive reuse, prioritizing funds for seismic retrofits to historic properties. Mitigation also includes approaches to seek and integrate the histories and context statements from historically marginalized communities, immigrant communities, and to consult tribes and reflect indigenous perspectives.

Mitigation for adverse impacts to archaeological or cultural resources, could include:

- Modifying demolition review process so that historic review occurs even if SEPA thresholds are increased;
- Prior to commencing site-specific subsurface investigations of soils, notifying the local Indigenous Tribes so an archaeologist can observe the work;
- Funding survey and inventory of archaeological sites;
- Updating tree removal requirements for archaeological sites;
- Employing standard archaeological techniques such as archaeological testing, excavation and data recovery/collection of artifacts, documentation, analysis, sharing evidence with the local Indigenous tribes, and archiving, possibly in a repository for future research;
- Funding public education and outreach, including interpretive signage and/or a museum exhibit;
- Funding interpretive signage and educational programs for BIPOC communities' historic neighborhoods; or
- Funding development of digital and other media content, including film, to share holistic stories of the impacted resource(s).

With mitigation, what is the ultimate outcome?

All the alternatives have the potential for significant adverse impacts to cultural resources in the analysis areas. Such impacts can include physical alteration, damage, or destruction of all or part of a resource; alteration of the characteristics of the surrounding environment that contribute to the property's significance; and the introduction of visual or audible elements that are out of character with the property. Such impacts could alter the characteristics of a historic property in such a way as to diminish its integrity, thus affecting its eligibility to qualify for inclusion in the SL or NRHP.

Advanced planning to eliminate, minimize, or avoid impacts to cultural resources is crucial under all of the alternatives. Review of development projects on a case-by-case basis even if SEPA thresholds are raised will also help to eliminate, minimize, or avoid impacts to cultural resources. The ultimate outcome of such mitigation is to moderate or substantially lessen the adverse impacts to cultural resources before they are lost or significantly altered. With the

implementation of advanced planning or project-specific review, significant adverse impacts to cultural resources can be avoided or minimized.

Summary of Thresholds

Exhibit 1.6-23 summarizes potential impacts based on the evaluation in **Section 3.9 Cultural Resources**.

Exhibit 1.6-23. Cultural Resources Thresholds of Significance

Metric	Threshold	Alt. 1	Alt. 2	Alt. 3	Alt. 4	Alt. 5	Pref.
	Substantial changes to or alteration of features or characteristics, or loss (removal or demolition) of a cultural resource that prevents their eligibility for inclusion as a designated Seattle Landmark (SL), or inclusion in the National Register of Historic Places (NRHP), National Historic Landmark (NHL) program, or the Washington Heritage Register (WHR).[1]	▼	▼	▼	▼	▼	▼
	More than a moderate adverse impact (potential loss of or alterations to the physical evidence or tangible evidence of cultural history) to Culturally Important Resources (CIR), which for the purposes of this EIS are important to certain cultural groups or communities, whether or not they are listed or eligible for the SL, NRHP, or WHR.[2]	▼	▼	▼	▼	▼	▼

Note: Impacts are considered either unavoidable adverse (▼▼), adverse but able to be mitigated (▼), impact but less than adverse (▽), limited or none (—), moderately positive (△), or positive (▲). The Preferred Alternative was added to this exhibit since the Draft EIS—no changes were made to the impact summary for Alternatives 1–5.
1 All studied alternatives have the potential to result in change, alteration, or loss of architecturally historic buildings, structures, and objects that might be eligible for future designation on local, state, or federal registers. The alternatives could also have an impact on/damage to archaeological and cultural resources during below-ground work.
2 All studied alternatives have the potential to alter or result in loss of CIR through development. The CIR includes features important to certain cultural groups or communities.

1.6.10 Transportation

Source; SDOT, 2023.

How did we analyze Transportation?

This EIS provides a multimodal analysis of transportation in Seattle to evaluate the potential impacts of the proposed land use alternatives. The following metrics are included as part of the evaluation:

- Mode share by sector
- Transit capacity analysis
- Vehicle Miles Traveled (VMT), Vehicle Hours Traveled (VHT), and average trip speed
- Corridor travel time
- Volume-to-Capacity across screenlines
- Intersection level of service (LOS)
- State facility capacity analysis

Each metric is used to quantitatively evaluate and contextualize impacts.

~~Thresholds of significance utilized in this impact analysis include:~~A significant transportation impact under the No Action Alternative is identified if:

- A subarea would have a percentage of SOV travel exceeding the target stated in the Seattle 2035 Comprehensive Plan.
- A study route would operate over the transit agency crowding threshold.
- VMT per capita exceeds the existing level.
- A corridor would have a travel time LOS grade of F.
- A screenline would exceed the V/C threshold stated in the Seattle 2035 Comprehensive Plan by at least 0.01.

- A signalized intersection would operate at LOS E or F and an unsignalized intersection would operate at LOS F.
- A state facility does not meet the standard set by WSDOT.

A significant transportation impact under the ~~four~~ action alternatives is identified if:

- A subarea that does not exceed its SOV mode share target under the No Action Alternative would exceed its SOV mode share target or a subarea that exceeds its SOV mode share target under the No Action Alternative would have an increase in SOV mode share of at least 1% compared to the No Action Alternative.
- A study route that would operate at or under the transit agency crowding threshold under the No Action Alternative would operate over the transit agency crowding threshold or a study route identified as operating over the transit agency crowding threshold under the No Action Alternative would have an increase in passenger load of at least 5% compared to the No Action Alternative.
- VMT per capita would exceed the VMT per capita under the No Action Alternative.
- A corridor that would have a travel time LOS grade of A-E under the No Action Alternative would operate at LOS F or a corridor that would have a travel time LOS grade F under the No Action Alternative would have an increase in travel time of at least 5%.
- A screenline that would not exceed the V/C threshold under the No Action Alternative would exceed the V/C threshold or a screenline that would exceed the V/C threshold under the No Action Alternative would increase the V/C ratio by at least 0.01.
- The action alternative would cause an intersection that operated acceptably under No Action Alternative to operate unacceptably, or the action alternative would add at least a 5 second delay from the No Action Alternative at an intersection that operated unacceptably under the No Action Alternative.
- A state facility that would meet WSDOT's standards under the No Action Alternative would exceed WSDOT's standards or a state facility that does not meet WSDOT's standards under the No Action Alternative would increase the volume-to-LOS service volume ratio by at least 0.01 compared to the No Action Alternative.

What impacts did we identify? What is different between the Alternatives?

Citywide

Exhibit 1.6-24 and **Exhibit 1.6-25** summarize~~s~~ the potential impacts to Seattle's transportation system under each of the Draft EIS alternatives and Final EIS alternatives, respectively. The purpose of an EIS is to disclose how potential actions by the City may impact the transportation system in comparison to what is expected to occur with currently adopted zoning codes and policies. Therefore, the impacts of each action alternative are assessed against the performance of the transportation system under the No Action Alternative. The impacts identified under the No Action Alternative are also expected to occur under the action alternatives even if those alternatives would not result in additional impacts. Although the

focus of the EIS is not to mitigate conditions under the currently adopted zoning code (i.e., the No Action Alternative), many of the mitigation measures proposed for the action alternatives would also lessen impacts under the No Action Alternative.

The Draft EIS alternatives were analyzed before the Seattle Transportation Plan (STP) was adopted. As noted in the Draft EIS, some transportation mitigation projects could have secondary impacts. For example, the City may choose to increase the capacity to move people along its right-of-way by reallocating space to transit. A reallocation of general-purpose travel lanes would make more efficient use of city streets and help accommodate growth, but could have a secondary impact on auto travel. These types of secondary effects are apparent in the findings of the Final EIS revised modeling which includes assumptions based on the STP network maps, policy direction, and candidate projects. The revised Final EIS modeling indicates that it is likely that the Draft EIS alternatives would have slightly more impacts to roadway users and state facilities with the STP network and policy in place. For example, the screenline impacts identified for the Preferred Alternative may also occur with some of the Draft EIS alternatives. As required, the City would prepare additional analysis and take public and stakeholder input into consideration before implementing specific transportation improvement projects, whether they are included in the STP or identified as mitigation for an action alternative. SDOT may choose not to pursue the projects assumed for modeling purposes due to potential impacts and future outcomes from community engagement, but they are used as a reasonably likely assumption to assess the proposed land use alternative.

Seattle Transportation Plan VMT Target

The Seattle Transportation Plan targets a 37% reduction in VMT by 2044 (relative to a 2018 baseline). However, the PSRC regional travel demand model used for this EIS suggests increases in total VMT for all future year scenarios. To move toward a decreasing VMT trend, the City of Seattle would need to pursue additional strategies related to equitable demand management through vehicle pricing; parking supply and pricing; investments to maximize the comfort, convenience, and reliability of walking, rolling, and riding transit; and land use coordination to increase transit-oriented development. Additional information may be found in **Section 3.10.3 Mitigation Measures**.

Therefore, ~~A~~all action alternatives are expected to have significant impacts to transit passenger load, c~~C~~orridor travel time, screenlines, intersection LOS in the NE 130th/NE 145th Street Subarea, and state facilities. Impacts of Alternatives 2 and 3 would be similar to one another while impacts of Alternative 5 and the Preferred Alternative are expected to be higher in magnitude due to the increased growth. Alternative 4 would fall within this range, likely closer in magnitude to Alternatives 2 and 3 than Alternative 5 and the Preferred Alternative. **Exhibit 1.6-24** and **Exhibit 1.6-25** detail~~s~~ the types and number of impacts expected under each alternative.

In addition to **Exhibit 1.6-24** and **Exhibit 1.6-25**, **Exhibit 1.6-26** and **Exhibit 1.6-27** summarize some of the key metrics ~~across the alternatives~~for the Final EIS alternatives graphically. Similar graphics for the Draft EIS alternatives are shown in **Exhibit 3.10-78** and **Exhibit 3.10-79** in **Section 3.10.2**.

Exhibit 1.6-24. Overview of Significant Adverse Impacts: ~~All~~ Draft EIS Alternatives

Impact Type	Alt. 1—No Action	Alt. 2—Focused	Alt. 3—Broad	Alt. 5—Combined
SOV Mode Share	Duwamish subarea impacted	No additional impacts beyond No Action	No additional impacts beyond No Action	No additional impacts beyond D No Action
VMT per Capita	No	No	No	No
Active Transportation	No	No	No	No
Transit	8 routes: Light Rail 1, 2, and 3 Lines; RapidRide E, J, R, Denny & Fremont	8 routes under No Action + additional impacts to RapidRide E, J, R & Fremont	8 routes under No Action + additional impacts to RapidRide E, J, R & Fremont	8 routes under No Action + additional impacts to RapidRide E, J, R & Fremont
Roadway Users				
Corridor Travel Time	4 corridors: Mercer, Stewart, Olive & Michigan	4 corridors under No Action + additional impact to Olive	4 corridors under No Action + additional impact to Olive	4 corridors under No Action + additional impact to Olive
Screenline	No	No	No	No
130th/145th Subarea Intersection LOS	6 intersections: 145th/Aurora, 145th/5th, 145th/15th, 130th/Aurora, 130th/1st & 125th/15th	Additional impacts to the 6 intersections impacted under No Action	Additional impacts to the 6 intersections impacted under No Action	Additional impacts to the 6 intersections impacted under No Action + impact at 130th/Roosevelt/5th
State Facilities	7 segments along I-5, SR 99, SR 509 & SR 522	7 segments under No Action + additional impacts along I-5, SR 99, & SR 522	7 segments under No Action + additional impacts along I-5, SR 99, & SR 522	7 segments under No Action + additional impacts along I-5, SR 99, SR 509 & SR 522
Safety	No	No	No	No

Source: Fehr & Peers, 2023.

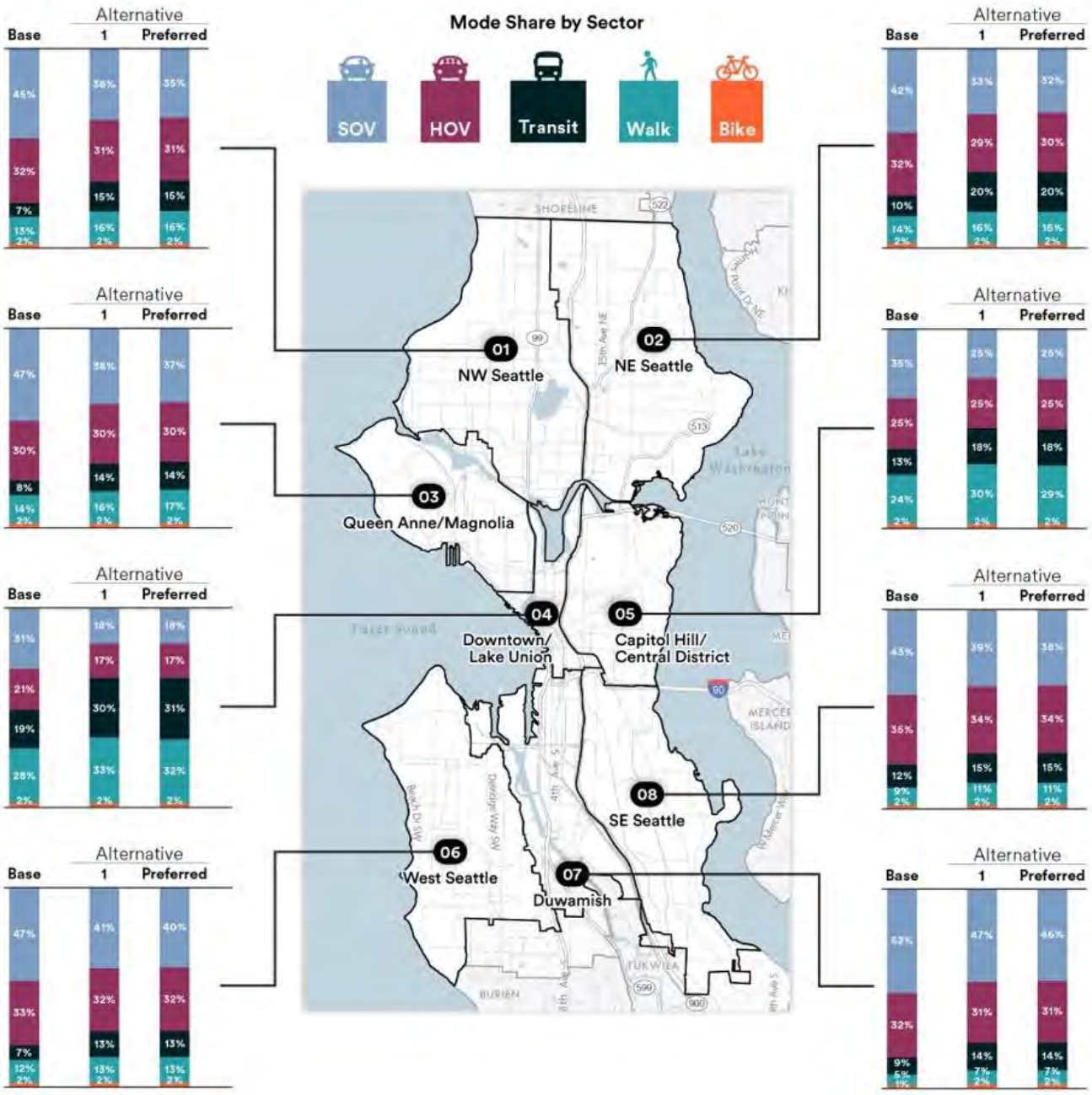
Exhibit 1.6-25. Overview of Significant Adverse Impacts: Final EIS Alternatives

Impact Type	Alt. 1—No Action	Preferred Alternative
SOV Mode Share	Duwamish subarea impacted	No additional impacts beyond No Action
VMT per Capita	No	No
Active Transportation	No	No
Transit	7 routes: Light Rail 2 and 3 Lines; RapidRide E, J, R, Denny & Fremont	7 routes under No Action + additional impacts to Light Rail 2 Line and RapidRide E, J, R, Denny & Fremont; new impact to RapidRide 65th
Roadway Users		
Corridor Travel Time	6 corridors: 25th Avenue NE, Mercer, Stewart, Olive, Boren & Michigan	6 corridors under No Action + additional impacts to Mercer and Stewart; new impact to Denny
Screenline	3 screenlines: Ship Canal - Fremont Bridge; Ship Canal - University & Montlake Bridges; East of I-5 – NE Northgate Way to NE 145th St	3 screenlines under No Action + additional impacts to Ship Canal - Fremont Bridge and Ship Canal - University & Montlake Bridges
130th/145th Subarea Intersection LOS	5 intersections: 145th/Aurora, 145th/15th, 130th/Aurora, 130th/1st & 125th/15th	Additional impacts to the 5 intersections impacted under No Action + impacts at 130th/Meridian and Roosevelt/125th/10th
State Facilities	8 segments along I-5, I-90, SR 99, SR 509 & SR 522	8 segments under No Action + additional impacts along I-5, I-90, SR 99, SR 509 & SR 522
Safety	No	No

Note: This exhibit is new since the Draft EIS.

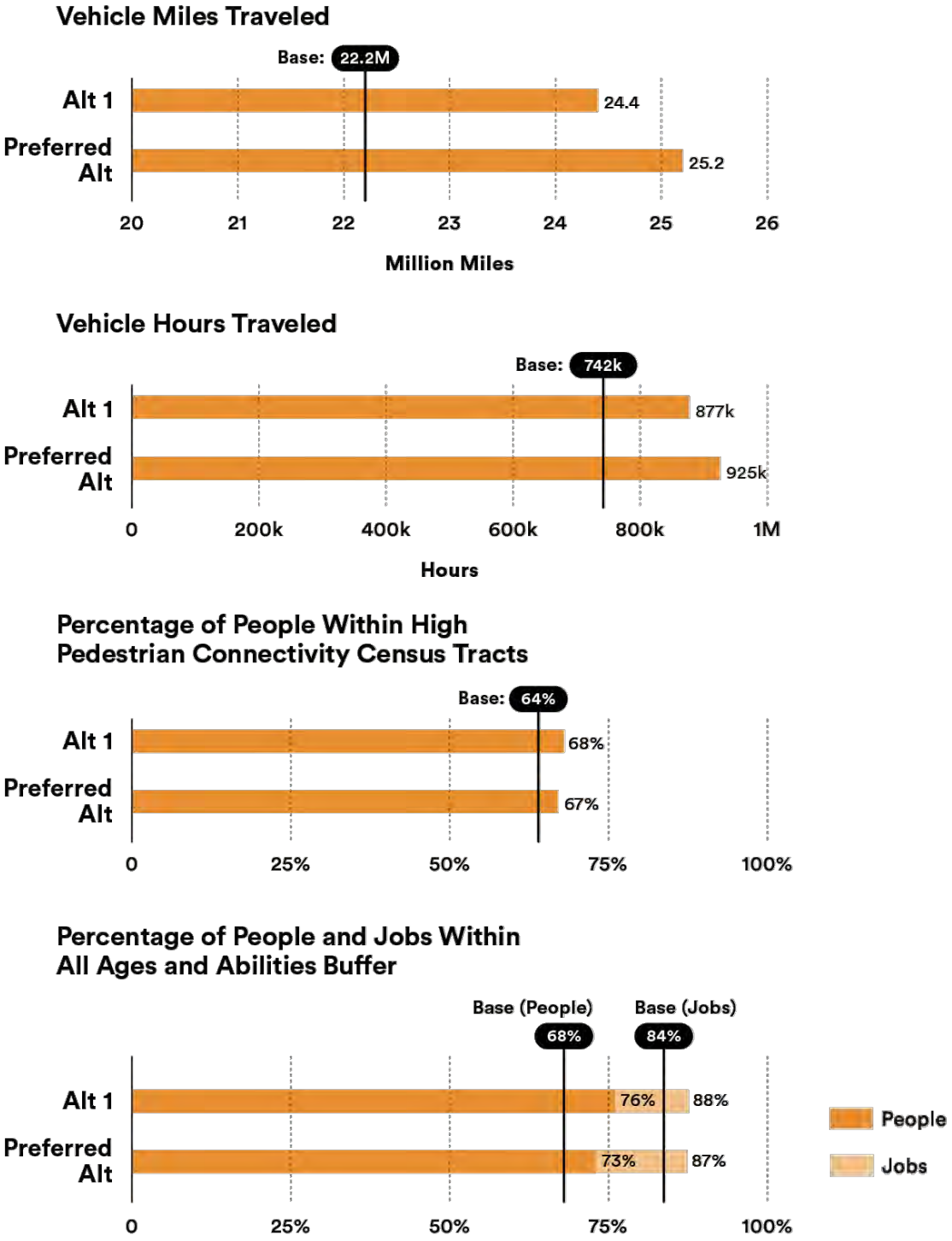
Source: Fehr & Peers, 2025.

Exhibit 1.6-26. Transportation Metrics ~~Across the~~: Final EIS Alternatives



Notes: This exhibit was updated since the Draft EIS to show only the updated Alternative 1, No Action, with STP and the Preferred Alternative. Base refers to 2019. All alternatives are studied with 2044 as a horizon year.
Source: Fehr & Peers, 202<u>5</u>~~3~~.

Exhibit 1.6-27. Citywide Transportation Metrics: Final EIS Alternatives



Note: This exhibit was updated since the Draft EIS to show only the updated Alternative 1, No Action, with STP and the Preferred Alternative.

Source: Fehr & Peers, 2025~~3~~.

130th/145th Station Area

The following intersections within the 130th/145th Station Areas could be significantly impacted by one or more action alternatives:~~Under Alternative 1, six intersections are expected to no longer meet the LOS D threshold, constituting a significant impact. These include:~~

- N 145th Street / Aurora Avenue N
- NE 145th Street / 5th Avenue NE
- NE 145th Street / 15th Avenue NE
- N 130th Street / Aurora Avenue N
- N 130th Street / Meridian Avenue N
- N 130th Street / 1st Avenue NE
- NE 130th Street / Roosevelt Way NE / 5th Avenue NE
- Roosevelt Way NE / NE 125th Street / 10th Avenue NE
- NE 125th Street / 15th Avenue NE
- ~~Under Alternative 2, six intersections are expected to fall below the LOS D threshold; these intersections are the same as those identified under Alternative 1. However, operations are expected to degrade with five of the six intersections falling from LOS E to F. All six intersections would experience at least five additional seconds of delay (the impact threshold) and therefore are considered to have a significant impact under Alternative 2.~~

Relative to the No Action condition, increases in ~~D~~delay~~s~~ would generally be longest ~~under~~ with Alternative 5 and the Preferred Alternative because they include the highest increment of growth. ~~Under Alternative 5, impacted intersections would include the six intersections identified under the other Alternatives as well as the intersection of NE 130th Street/Roosevelt Way NE/5th Avenue NE which would fall from LOS D to LOS E.~~

What are some solutions or mitigation for impacts?

Citywide

The mitigation strategies in **Section 3.10 Transportation** include:

- Transportation Systems Management and Operations (TSMO)
- Transportation Demand Management (TDM)
- Pedestrian and Bicycle System Improvement
- Transit Strategies
- Parking Management Strategies
- Safety Strategies

Source: City of Seattle, 2023.

Equity & Climate Vulnerability Considerations

Providing additional housing growth in areas with more complete infrastructure could advance equity by expanding the opportunity for more people to live in those areas. From that perspective, all of the action alternatives could advance equity by providing more housing opportunities throughout the city with Alternative 5 and the Preferred Alternative providing the most opportunity through ~~its~~ higher housing targets.

An important consideration for climate vulnerability and health disparities is the distribution of effects from emissions, generated by personal and freight vehicles. Underserved communities often face the highest effects of vehicle emissions; for example, freight traffic emissions or poor air quality due to close proximity heavily congested roadways and freeways. Total VMT generated by each alternative was estimated using the SoundCast model. The action alternatives are expected to result in higher VMT than the No Action Alternative due to the increased growth levels. The increase for Alternatives 2 and 3 is expected to be approximately 1% higher than the No Action Alternative and for Alternative 5 and the Preferred Alternative are~~is~~ expected to be approximately 3% higher. Alternative 4 would fall within that range and likely most similar to Alternatives 2 and 3. Therefore, it is possible that the action alternatives—Alternative 5 and the Preferred Alternative in particular—could result in additional vehicle emissions near underserved communities along high vehicle emissions roadways.

From a regional perspective, accommodating more growth within dense urban areas like Seattle provides better climate outcomes than if that growth were accommodated elsewhere. Therefore, at a regional scale, concentrating more growth within Seattle is expected to lead to travel behaviors with lower impacts to climate vulnerability than if that growth occurred in outlying areas. Because all of the action alternatives would accommodate more growth than the No Action Alternative, they are expected to result in better climate outcomes with Alternative 5

and the Preferred Alternative providing the most benefit as it would accommodate the highest level of housing growth within Seattle.

130th / 145th Street Station Area

~~Analysis of the action alternatives, relative to the No Action Alternative 1, identified seven impacted intersections.~~ The following ~~impacted~~ intersections ~~are listed below~~ within the 130th/145th Station Areas could be significantly impacted by one or more action alternatives:

- N 145th Street / Aurora Avenue N
- NE 145th Street / 5th Avenue NE
- NE 145th Street / 15th Avenue NE
- N 130th Street / Aurora Avenue N
- N 130th Street / Meridian Avenue N
- N 130th Street / 1st Avenue NE
- NE 130th Street / Roosevelt Way NE / 5th Avenue NE
- Roosevelt Way NE / NE 125th Street / 10th Avenue NE
- NE 125th Street / 15th Avenue NE

Each significantly impacted intersection was evaluated to identify potential mitigation measures that would address delay impacts such that intersection delays would not exceed the five second impact threshold relative to Alternative 1.

Some impacts could be addressed with more minimal interventions such as signal timing and phasing modifications while others would require physical changes to the intersections to expand capacity, for example adding turn pockets or lanes. However, adding physical capacity to these intersections is likely not practical or desirable due to right-of-way constraints and potential secondary impacts to other modes, and conflicts with the network maps and policy direction of the STP. As described in the analysis for the Preferred Alternative, the modeling assumptions based on the STP network maps, policy direction, and candidate projects include reconfiguring NE 130th Street and NE 145th Street to reallocate some general purpose vehicle capacity to facilities for other modes such as transit lanes, bicycle lanes, and/or widened sidewalks. The adopted STP also includes potential ~~Instead, the City would likely pursue~~ multimodal improvements aimed at making transit, walking, and biking more convenient and comfortable such that people have more options to choose from when traveling through the neighborhood. ~~The Seattle Transportation Plan (STP) outlines the types of multimodal improvements that are being considered.~~ Therefore, it is likely that intersection LOS at some locations would continue to operate below the threshold set forward in this EIS.

With mitigation, what is the ultimate outcome?

Regardless of the alternative selected, increased travel demand is expected to result in potentially significant adverse impacts to transit passenger load, corridor travel time, screenlines, intersection LOS in the NE 130th/NE 145th Street Subarea, and state facilities.

~~The City is expected to pursue targeted transportation capacity improvements focused on improved transit, bicycle, pedestrian, and freight connections. Additionally, the City will manage demand using policies, programs, and investments aimed at shifting travel to non-SOV modes. However, the magnitude and duration of traffic congestion during peak periods (as measured using corridor travel time) is expected to be exacerbated as growth continues to occur.~~

Significant impacts to transit were identified under all action alternatives with respect to transit passenger loads. Mitigation measures could lessen the severity of the passenger load impacts. However, due to the increment of change projected, service levels may not be able to fully mitigate the projected impacts. Therefore, a significant unavoidable adverse impact to transit capacity is expected.

The City is expected to pursue targeted transportation capacity improvements focused on improved transit, bicycle, pedestrian, and freight connections. Additionally, the City will manage demand using policies, programs, and investments aimed at shifting travel to non-SOV modes. However, the magnitude and duration of traffic congestion during peak periods (as measured using corridor travel time) is expected to be exacerbated as growth continues to occur.

Some combination of the travel demand management strategies could be implemented to reduce the magnitude of SOV travel. These programmatic measures may lessen the severity of some of the potential impacts, particularly the travel time impacts which are fairly limited in scope. However, in the absence of state facility capacity expansion beyond that already planned and funded or other increased vehicle capacity across the Ship Canal, the action alternatives may still result in potentially significant unavoidable adverse impacts to state facilities and screenlines.

Some of the impacts to subarea intersections would require physical capacity expansions which are unlikely to be implemented due to right-of-way constraints and potential secondary impacts to other modes. Therefore, the intersection impacts are not expected to be fully mitigated and the action alternatives may still result in a significant unavoidable adverse impact to intersection LOS.

Summary of Thresholds

Exhibit 1.6-28 summarizes potential impacts based on the evaluation in **Section 3.10 Transportation** (summarized in **Exhibit 1.6-24**).

Exhibit 1.6-28. Transportation Impact Thresholds and Alternative Comparison

Metric	Threshold Summary	Alt. 1	Alt. 2	Alt. 3	Alt. 4	Alt. 5	Pref.
	SOV travel exceeding the 2035 Plan target/ +1% over no action	▼▼	—	—	—	—	—
☒ Equity & Climate	VMT increase	Future baseline	▽	▽	▽	▽	▽
☒ Equity & Climate	VMT per capita exceeds the existing level / no action level	—Future baseline	—	—	—	—	—
☒ Equity & Climate	Active Transportation	—	—	—	—	—	—
	Over the transit agency crowding threshold/ +5% no action	▼▼	▼▼	▼▼	▼▼	▼▼	▼▼
	Corridor would have a travel time LOS grade of F / +5% no action	▼	▼	▼	▼	▼	▼
	Screenline exceeding the 2035 Plan target by 0.01/ +.01 over no action	▼▼—	▼▼—	▼▼—	▼▼—	▼▼—	▼▼
	130th/145th Subarea Intersection LOS 3 or F / +5 seconds over no action	▼▼	▼▼	▼▼	▼▼	▼▼	▼▼
	State Facilities: Does not meet the standard set by WSDOT / increase by at least 0.01 over no action	▼▼	▼▼	▼▼	▼▼	▼▼	▼▼
	Safety	—	—	—	—	—	—

Note: Impacts are considered either unavoidable adverse (▼▼), adverse but able to be mitigated (▼), impact but less than adverse (▽), limited or none (—), moderately positive (△), or positive (▲). The Preferred Alternative, and associated analysis in the notes, was added to this exhibit since the Draft EIS—additional revisions to the impact summary for Alternatives 1–5 are shown in tracks. The findings have been updated for Alternatives 1 through 5 based on the findings of the Final EIS revised modeling. With the STP network maps, policy direction, and candidate projects in place, it is likely that the Draft EIS alternatives would have slightly more impacts to roadway users and state facilities. In particular, the screenline impacts identified for the Preferred Alternative may also occur with some of the Draft EIS alternatives.

1.6.11 Public Services

How did we analyze Public Services?

This section addresses the potential impacts on public services associated with each alternative. Public services are defined as police, fire, emergency medical; parks and recreation; and schools. These services are provided citywide principally by the City of Seattle for police, fire, and parks, and by the Seattle Public Schools for education. The evaluation considers available capital and operational plans and data from service providers such as calls for service, distribution and types of facilities, and usage.

Impacts of the alternatives are considered significant if they:

- Result in insufficient parks, open space, and trail capacity to serve expected population based on existing levels of service.

- Create inconsistencies with shoreline public access policies.
- Result in increases in public school enrollment that cannot be accommodated through regular school planning processes.
- Increase demand for police or fire and emergency that can't be accommodated through regular planning and staffing processes.
- Result in insufficient capacity to handle solid waste under current Seattle Public Facility plans.

What impacts did we identify?

Demand for new park acres would increase under each alternative ~~if the City maintains its 8.0 acres per 1,000 population level of service~~. Greater population growth across the city could increase demand for shoreline public access. ~~New levels of service are anticipated to be applied.~~

Demand for police, fire, and solid waste services would increase with greater population and employment growth. Additional police officers, fire units, and solid waste services would be needed to maintain current levels of service. action alternatives would update level of service policies and capital facility plans as needed.

What is different between the Alternatives?

Parks

Citywide

The 2024 Parks and Open Space Plan's adopted level of service aims to provide parks and park facilities within a 10-minute walk of all residents. As of 2023, approximately 95% of the City's population are within a 10-minute walk of a park or park facility. ~~The current parks level of service is 8.0 acres per 1,000 population (from Seattle 2035 and 2017 Parks and Open Space Plan). However, the city is considering options for updating the level of service as part of the Comprehensive Plan Update. The goal of updating the level of services is to make it more consist with the City's goals and approach to acquisition.~~

Additional park acres would be needed under each alternative if the City maintains its 8.0 acres per 1,000 population level of service. Currently, Seattle Parks and Recreation manages 6,478 acres of parks.

~~The acreage needed would range from 1,331 to 1,997 acres between Alternative 1 and Alternative 5, with Alternatives 2 through 4 requiring an additional 1,664 acres.~~ The alternatives would add more growth including within a 10-minute walk to the parks, and increase demand and use of current parkland. Alternative 1 would have the lowest additional demand with 80,000 more dwelling units and Alternative 5 and the Preferred Alternative the greater demand at 120,000 new housing units. Within each analysis area, the population demand would be highest under Alternative 5 except that Area 4 Downtown would have the same growth and acres needed under all alternatives. Under each alternative, expected population growth is lowest in Area 7 due to the focus on employment (except

in South Park). ~~Within each analysis area, the acres required are highest under Alternative 5. See Exhibit 1.6-28.~~ The City currently has 6,478 acres of parkland. If no new acres are added to the City's inventory, the ~~LOS~~ rate of acres per 1,000 would drop. See **Exhibit 1.6-29**.

Exhibit 1.6-29. Acres per 1,000 Population if Park Inventory Does Not Increase

	Actual 2022	Actual 2023	POS 2035	Alt. 1 2044	Alt. 2-4 2044	Alt. 5 2044	Preferred 2044
Population	762,500	779,200	802,358	966,358	862,500	1,007,358	1,007,358
Rate: Acres per 1,000 population	8.50*	8.31	8.07	6.70	6.43	6.18	6.18

Note: This exhibit was added since the Draft EIS. Adds potential population of 2.05 persons per household within new housing units to an estimated 2024 base population of 802,358 accounting for housing under construction or permitted.
*The acres of parks increased between 2017 and 2024 from 6,414 to 6,478. The 2024 estimate is used in this table.
Sources: OFM, 2022; Seattle Parks and Recreation, 2017; BERK, 2024.

~~**Exhibit 1.6-28. Additional Acreage Needed to Meet Parks LOS by Alternative**~~

~~Alternative~~	~~Total Net Acreage Needed~~
~~**Alternative 1**~~	~~1,312~~
~~**Alternative 2**~~	~~1,640~~
~~**Alternative 3**~~	~~1,640~~
~~**Alternative 4**~~	~~1,640~~
~~**Alternative 5**~~	~~1,968~~

~~Notes: Converts housing units to population using a persons per household of 2.05 regional housing target efforts. The 8 acres per 1,000 population is applied to net population growth.~~
~~Source: BERK, 2023.~~

~~The acreage needed would range from 1,312 to 1,968 acres between Alternative 1 and Alternative 5, with Alternatives 2 through 4 requiring an additional 1,640 acres. Within each analysis area, the acres required are highest under Alternative 5 except that Area 4 Downtown would have the same growth and acres needed under all alternatives. Under each alternative, expected population growth is lowest in Area 7 due to the focus on employment (except in South Park).~~

130th/145th Station Area

Within and adjacent to the station study area are parks and open space including Jackston Park Golf Course, Flicker Haven Natural Area, and Northacres Park. All alternatives would result in an increased demand for parkland, with most demand under Alternative 5 and the least demand under Alternative 1 in the 130th Street Station Area. The Preferred Alternative has a slightly lower demand in the 130th Street Station Area compared to Alternative 5. In the 145th Street Area, demand for parkland would be slightly higher under Alternative 2 and Alternative 5 than the No Action Alternative (with demand highest under Alternative 2). The Preferred Alternative has the lowest demand similar to the No Action Alternative.

Schools

Citywide

It is not possible to develop an accurate twenty-year projection of school needs given the wide variety of factors that influence these numbers and the recent fluctuations in public school enrollment. As a high-end estimate of potential impacts, it may be helpful to estimate the number of new classrooms that would be needed if recent trends change and the percentage of the total population enrolled in Seattle Public Schools holds steady over the next twenty years.

Applying this rate to expected population growth shows a range of 10,755~~912~~-16,132~~368~~ students generated by each alternative, the least under Alterative 1 and the most under Alternative 5 and the Preferred Alternative. Depending on the grade level and pace of housing and population growth, new classrooms or schools could be needed over time to accommodate growth.

Based on planning level estimates of students per school, there could be a need between 436-655 classrooms. Under all alternatives, most population growth, and therefore students, would be added in areas 1 and 2. Student growth in Area 4 would be the same across ~~all~~ Alternatives 1-5 and would likely go to schools in areas 3 and 5 as there are no schools located in Downtown. The Preferred Alternative has a slightly lower demand in Area 4. Areas 6, 7, and 8 would have the second highest share of population and students in all the action alternatives 1-4 whereas in the Preferred Alternative Areas 3-5 are the second highest share.

Within the analysis areas, most growth would be directed to centers under all alternatives and schools in those areas would be most affected. However, in Alternatives 2-5 and the Preferred Alternative, more areas currently zoned Neighborhood Residential would see growth, which may be focused around neighborhood centers, corridors, or elsewhere distributed through distributed growth of missing middle housing types.

While K-12 public school enrollment has declined over the last 5 years, future population growth has the potential to increase student enrollment in various areas throughout the city. Seattle Public Schools monitors changes in enrollment to track expected future needs and would adjust their enrollment projections accordingly for future planning cycle. SPS would respond to the exceedance of capacity as it has done in the past by adjusting school boundaries and/or geographic zones, adding or removing portables, adding/renovating buildings, reopening closed buildings or schools, and/or pursuing future capital programs.

130th/145th Station Area

There would be an increase in housing, population, and students with most under Alternative 5 and least under Alternative 1. Depending on alternative, the number of students could be greatest in 130th Street Station (Alternative 5) or at 145th Street (Alternative 2). The Preferred Alternative is in the range below Alternative 5.

Police

Citywide

Growth in housing and jobs is expected to occur incrementally under all alternatives. For the purposes of the EIS analysis, increased density of population and jobs is anticipated to increase the potential demand for police services. However, many factors can influence crime rates. Literature and studies have identified population density and socioeconomic conditions (diminished economic opportunities, concentrations of poverty, high level of transiency, low levels of community participation) as factors as well as prevalent attitudes towards crime and crime reporting. Property crimes are more prevalent than violent crimes and property crimes such as robbery and motor vehicle theft tend to occur at intersections rather than in whole neighborhoods. Victims of crimes are also more likely to be persons of color and younger.

The estimated number of officers per 1,000 residents is 1.4 in 2022. Given that SPD staffing levels are as low as they have been since 1980 based on data collected by the Washington Association of Sheriffs and Police Chiefs (WASPC), this analysis uses a rate of 1.73~~8~~ officers per 1,000 residents, which is the average rate between 2010 and 2022.

Based on population and housing growth alone Alternative 1 would have the least demand and Alternative 5 and the Preferred Alternative the most demand for police staffing. Most demand would occur in areas with the greatest planned growth in Areas 1 and 2. Area 4 Downtown may need alternative ratios with a focus on office employment as well as residential uses. Area 7 may also need other personnel depending on needs with industrially focused land use. See **Exhibit 1.6-30**.

Exhibit 1.6-30. Estimate of Officer FTEs per 1000 Residents at Avg. LOS 2010-2022

Alternative	Area 1	Area 2	Area 3	Area 4*	Area 5	Area 6	Area 7*	Area 8	Total
Current (est.)	219.0	177.7	100.5	143.3	193.1	128.0	6.3	109.3	1,077.0
Alternative 1	266.6	222.3	121.2	212.8	239.2	148.9	13.3	132.3	1,356.6
Alternative 2	283.6	242.6	128.8	212.8	250.5	160.9	14.6	136.7	1,430.5
Alternative 3	280.6	249.7	123.8	212.8	241.1	163.7	13.4	145.4	1,430.5
Alternative 4	279.3	252.8	123.5	212.8	241.3	163.2	13.4	144.1	1,430.5
Alternative 5	295.2	262.1	129.2	212.8	249.7	176.8	19.6	158.9	1,504.3
Preferred	310.0	261.1	132.3	211.1	255.6	173.2	12.0	147.2	1,502.6

Note: the level of service calculation is based on Seattle Police Department's average level of service from 2010-2022 which is 1.73~~8~~ officers per 1,000 residents. The Preferred Alternative was added to this exhibit since the Draft EIS—no edits were made to Alternatives 1–5.
*Area 7 is predominantly industrial and will be regardless of alternative growth strategy.
Source: Washington Association of Sheriffs and Police Chiefs, 2023, BERK, 2024~~3~~.

130th/145th Station Area

Incremental growth under each alternative would contribute to demand for officers in Area 2 with least under Alternative 1 and most under Alternative 5. The Preferred Alternative would have the second highest level of demand in the station area. See **Exhibit 1.6-30**.

Fire/Emergency Medical Services

Citywide

Growth in worker and residential populations in the study area is expected to lead to an increased number of calls for aid, basic and advanced life support, and other emergency services. Growth is expected to occur incrementally under all alternatives, as individual development projects are constructed. The Seattle Fire Department would attempt to maintain response times consistent with or better than current performance levels as the population grows. Over time, additional staffing and equipment within each analysis area would be required in order to maintain or improve performance levels.

Additional units would need to be added to meet the current levels of service of apparatus per 1,000 dwelling units. However, based on Seattle Fire Department's Live dispatch dashboard as well as the SFD 2021 annual report, citywide unit additions should reflect aid unit prioritization over other fire units. Across all alternatives, each subarea or battalion should have at least a single aid unit stationed at a centrally located station to limit fire unit dispatches on aid calls.

Secondarily, the recommendations for Area 4 are consistent across all alternatives and reflect the growing need for an additional unit to fill the gap in service in the South Lake Union neighborhood.

Alternative 5 and the Preferred Alternative having the highest growth has the greatest need for apparatus. More apparatus under any of the alternatives may require additional personnel and expanded stations. Any potential future fire facility, staffing, or equipment needs will be included as part of the City's annual Budget and Capital Improvement Program process.

130th/145th Station Area

The 130th and 145th Station Area is in Area 2, and between SFD Stations 24, 31 and 39. These stations' units include two engines, one ladder, and one air unit. Growth in the station areas could increase demand.

- Alternative 1: This area is currently identified as a hole in service and may require additional units at the Bitter Lake fire station to meet minimum service standards. This likely would not require a new station given that nearly all development is targeted at urban centers and the Northgate station is already well equipped with support units in case of multiple calls to the transit station area.
- Alternative 2: Fire services at the station area would require either a new station or additional units at Bitter Lake to support higher density housing, which results in additional aid calls as well as one additional firefighting unit as is customary at new stations. SFD has identified this area as a hole in service that falls just outside of the minimum response buffer of two different stations; providing additional units at one or both stations could better equip them to handle increased demand.
- Alternative 5 and the Preferred Alternative: This alternative presents that largest increase in unit needs for the transit stations areas. ~~Alternative 5:~~ If an additional aid unit is provided at each of the nearby stations at Bitter Lake and Lake City, SFD can maintain and even

improve the service levels of the station area without being forced to cross Interstate-5 which may present a challenge depending on the time of day.

Solid Waste

Citywide

Growth in residential, commercial, and self-haul solid waste is expected to increase under all alternatives.

Exhibit 1.6-31 and **Exhibit 1.6-32** offers estimates of each solid waste stream by customer types for alternatives based on job growth estimates and housing units. The number of people per household is variable but is estimated at 2.05 people per household for these calculations. All alternatives estimate 158,000 additional jobs in Seattle between 2024 and 2044.

Exhibit 1.6-31. Estimated Tons of Solid Waste (Garbage, Recycling, Compost) Generated by Alternative—Residential

Scenario	Resident estimates	Tons of Waste Per year estimate	Tons of Diversion at goal rate: 70%
Current: 2020	762,148	315,739	221,017
Alternative 1	966,358	400,338	282,336
Alternative 2	1,007,358	417,323	292,126
Alternative 3	1,007,358	417,323	292,126
Alternative 4	1,007,358	417,323	292,126
Alternative 5	1,048,358	434,308	304,015
Preferred	1,048,358	434,308	304,015

Note: The Preferred Alternative was added to this exhibit since the Draft EIS—no edits were made to Alternatives 1–5.
Sources: SPU, 2020 Annual Waste Prevention & Recycling Report; BERK, 2024~~3~~.

Exhibit 1.6-32. Estimated Tons of Waste Generated for Commercial Customers

Year	Employee Estimates	Tons per year based on 2020 per employee estimate	Diversion at current recycling rate: 61.6%	Diversion at goal recycling rate: 70%
2020 (per 2020 employee estimate)	499,146 employees	286,036 tons	176,198.2 tons	200,225.2 tons
2044 estimates, all alternatives	746,447 employees	427,751 tons	263,494.9 tons	299,426 tons

Sources: SPU, 2020 Annual Waste Prevention & Recycling Report; BERK, 2023.

To meet the additional need for solid waste services, contracts with waste haulers are renegotiated every 10 years. Fees charged to residential and commercial customers from Seattle Public Utilities and from waste haulers directly support the necessary capital investments needed to ensure minimum levels of service.

130th/145th Station Area

Alternative 1 produces a small residential growth number. The number of dwelling units would change the type of service but would not significantly impact levels of service.

Under Alternative 5, impacts to solid waste would be similar to and slightly greater than Alternative 2 with a small increase in the number of dwelling units and waste volume. Under the Preferred Alternative, impacts to solid waste would be similar to and slightly greater than Alternative 2 with a small increase in the number of dwelling units and waste volume.

Equity & Climate Vulnerability Considerations

Each service and facility type would be affected by climate change and has the opportunity to invest in more equitable services. Alternatives with greater growth have the potential to affect service delivery more than lesser growth alternatives, but all alternatives have the potential to create new investments to improve equitable services and climate resiliency.

Police Services: SPD has developed Micro Community Policing Plans (MCPP) to address the individual needs of each community. Based on the City's equity opportunity areas evaluation and engagement with the community in each area, these plans could be updated. Police access to parts of the city could be affected by extreme precipitation, flooding, sea level rise, and landslides. Alternatives with greater growth such as Alternatives 2–4 and particularly Alternative 5 and the Preferred Alternative may require greater police services and may mean additional personnel and facilities that need to be adapted for climate resilience.

Fire/Emergency Services: While the Seattle Fire Department is the main firefighting entity within Seattle, most of its work is rooted in health services and fire prevention. To reduce fires in homes SFD works with communities throughout Seattle to distribute fire prevention flyers that have been translated in the top seven spoken languages in Seattle to ensure compliance with fire safety standards regardless of language. Fire prevention outreach also helps alleviate racial and social inequities. Housing structures in the Southwest, Southeast, and East Central regions of the city are more likely to be older and to potentially benefit from fire prevention outreach. These areas are also more disadvantaged than elsewhere in the city per Seattle Racial and Social Equity Index. Targeting fire prevention outreach in these areas is vital to alleviating fire safety inequity.

Aside from outreach and prevention, SFD also performs fire inspections on existing homes as well as required inspections on new development. Each alternative will result in an increase in the number of multi-family units and may require additional staff to adequately provide fire prevention services to the growing population. Alternative 5 and the Preferred Alternative would have more demand than Alternatives 2–4 and Alternative 1.

Schools: The City's responsibility in planning for schools is to coordinate with the School District in planning for growth and modernization. Equitable access improvements would help all local students in priority areas under all alternatives.

Parks: Parks are important for community health and well-being and a key amenity in growth areas. The City developed an overlay of public space priority areas considering race and social

equity, density and growth, and health outcomes in its parks system plan. Areas of the highest priority for plans/programs/investments based on Race and Social Equity are generally in the south end of the City including Delridge (Area 6), South Park (Area 7), and Southeast Seattle (Area 8). The need for continued investment in priority areas would be similar across all alternatives.

Solid Waste: SPU has also joined with Seattle City Light to mitigate cost burden of utility services on low-income households through the Utility Discount Program. The Clean City Division of SPU also provides necessary debris clearance in the event of climate emergencies and ensure equitable distribution of resources by utilizing Seattle's Racial Equity Toolkit in program planning and implementation. This toolkit and the division ensure that public litter receptacles, litter abatement routes, and encampment solid waste collection (purple bag program) are equitably distributed throughout the city and are not prioritized in highly resourced communities. These and similar programs could support residents under all alternatives.

What are some solutions or mitigation for impacts?

All Services

- The City is updating its Comprehensive Plan, including its public services policies, and coordinating with service providers regarding growth estimates.
- Compact growth in centers under all alternatives and in other areas of focus like neighborhood centers and corridors in Alternatives 2 and 4 could result in more efficient service delivery. More diffuse growth in urban neighborhood areas in Alternatives 3 and 5 and the Preferred Alternative could distribute the demand more incrementally making use of existing infrastructure like schools, parks, and fire stations.

Parks

~~The City could explore a level of service that has a lower acres per 1,000 population or an Alternative population density-based approach given the urban nature of the city.~~

The City could add additional or improve existing park space including:

- Expanding existing parks or adding capacity on existing parks (e.g., expanded play or sports facilities),
- Creating linear parks and trails,
- Increasing tree canopy coverage in rights-of-way or public parks and open space to reduce urban heat island effects,
- Developing recreation facilities on building rooftops to provide sports courts, athletic fields, off-leash dog areas, etc.,
- Developing community gardens (permitted on some rooftops in individual zones) as a way to provide open space and urban agricultural use,
- Increasing frequency of maintenance to offset an increase in park usage.

The City could implement a parks impact fee to help pay for the development of new park land if needed in the future.

The City could also explore transportation to and from parks and potentially increase connectivity between parks in areas of high equity opportunity.

Schools

- The City could implement a school impact fee to help pay for the development of new classrooms if they are needed in the future.
- The City could help identify interim uses for existing underutilized classrooms so that the school district can hold onto them in case they are needed in the future.
- The City could incentivize provision of public schools in centers in vertical formats, where new schools are needed. The City could also allow for greater heights at existing school locations where demand increases. Goals would be to protect recreation and tree canopy while allowing for more student classroom capacity.
- The City could update development standards and review processes for new schools in order to make it easier to add classrooms or build new schools if they are needed in the future.
- As part of development standards for new place types such as neighborhood centers and corridors, the City could enhance street cross sections including walking routes to schools in areas with added housing.
- The City could identify specific objectives to assist Seattle Public Schools in acquiring and developing new schools if needed.

Police & Fire Services

- SPD could update its MCPP described under "Incorporated Plan Features" or create updated police service programs to engage the community in police services that equitably and justly meet community needs.
- SFD could explore options to decrease call times through new station placement strategies that limit East/West travel which has historically been challenging for fire units during busier times of day.
- SFD could explore smaller, more nimble fire units that are better equipped to navigate Seattle's complex topography to decrease response times while still ensuring SFD's excellent standard of service for emergency medical and fire response.
- SFD could convert peak aid units that are available at certain times to full time aid units.
- SFD could add aid units in underserved areas.

Solid Waste

- Increasing budget for education and outreach services for multi-family residents
- Establishing more significant penalties for those who do not adhere to recycling and composting standards while increasing financial benefits for households and multi-family residents who opt for recycling and compost over landfill waste disposal.
- Require specific standards in solid waste hauling contracts to protect employees from adverse health impacts of their work during extreme weather events.

130th/145th Station Area

- **All:** The 130th/145th Station Area Plan includes several strategies related to parks, education, and schools.
- **Fire/Emergency Medical Services:** If an additional aid unit is provided at each of the nearby stations at Bitter Lake and Lake City, SFD can maintain and even improve the service levels of the station area and avoiding crossing Interstate-5 at congested times of the day.

With mitigation, what is the ultimate outcome?

Police

There will be an increase in population and jobs and an increase in demand for police services. However, there are mitigation measures to invest in resources to address needs and provide adequate services.

Fire/Emergency Medical Services

It is anticipated that increased demand for fire/emergency medical services can be accommodated due the changes in staffing for fire prevention education, increased capacity at station facilities, and either redistributing or increasing the number of units at each station. Consequently, no significant unavoidable adverse impacts are to be expected.

Parks

All alternatives will exceed the existing level of service and increase demand for parks and recreation facilities. With mitigation (adding parks, making better use of existing parks, or ~~updating~~ implementing the updated parks LOS) significant adverse impacts can be avoided.

Schools

All studied alternatives would result in increases in students. This could require additional school capacity unanticipated in current district plans. However, it is anticipated that Seattle Public Schools could respond to any new growth that may occur through regular capital planning and coordination. Consequently, no significant unavoidable adverse impacts are anticipated.

Solid Waste

It is anticipated that Seattle Solid Waste will be able to accommodate expected increases in solid waste service through regular contract renegotiation and ongoing maintenance and upkeep of capital facilities. Consequently, no significant adverse impacts are anticipated.

Summary of Thresholds

Exhibit 1.6-33 summarizes potential impacts based on the evaluation in **Section 3.11 Public Services**.

Exhibit 1.6-33. Public Services Thresholds of Significance

Metric	Threshold	Alt. 1	Alt. 2	Alt. 3	Alt. 4	Alt. 5	Pref.
☒ Equity & Climate	Result in insufficient parks, open space, and trail capacity to serve expected population based on existing levels of service.[1]	▼	▼	▼	▼	▼	▼
	Create inconsistencies with shoreline public access policies.[2]	▼	▼	▼	▼	▼	▼
	Result in increases in public school enrollment that cannot be accommodated through regular school planning processes.[3]	▼	▼	▼	▼	▼	▼
	Increase demand for police or fire and emergency that can't be accommodated through regular planning and staffing processes.[4,5]	▼	▼	▼	▼	▼	▼
	Result in insufficient capacity to handle solid waste under current Seattle Public Facility plans.[6]	▼	▼	▼	▼	▼	▼

Note: Impacts are considered either unavoidable adverse (▼▼), adverse but able to be mitigated (▼), impact but less than adverse (▽), limited or none (—), moderately positive (△), or positive (▲). The Preferred Alternative, and associated analysis in the notes, was added to this exhibit since the Draft EIS—no changes were made to the impact summary for Alternatives 1–5.

1 Additional park acres would be needed under each alternative if the City ~~maintains its 8.0 acres per 1,000 population level of service. The acreage needed would range from 1,312 to 1,968 acres between Alternative 1 and Alternative 5, with Alternatives 2 through 4 requiring an additional 1,640 acres.~~ The 2024 Parks and Open Space Plan's adopted level of service aims to provide parks and park facilities within a 10-minute walk of all residents. Within designated regional and urban centers, the City aims to provide parks and park facilities within a 5-minute walk of residents. Alternative 1 would have the lowest additional demand with 80,000 more dwelling units and Alternative 5 and the Preferred Alternative the greater demand at 120,000 new housing units. Within each analysis area, the population demand would be highest under the Preferred Alternative (areas 1, 3, 5) or Alternative 5 (areas 2, 6, 7, and 8). In Area 4, Downtown would have similar growth and park demand under studied alternatives, with a slightly lower population under the Preferred Alternative.

2 Greater population growth across the city could increase demand for shoreline public access. The alternatives would range in demand from the least under Alternative 1 to the most under Alternative 5 and the Preferred Alternative. Shoreline Master Program requirements for shoreline public access for non-residential development could result in more public access as development occurs in shoreline jurisdiction.

3 While K-12 public school enrollment has declined over the last 5 years, future population growth has the potential to increase student enrollment in various areas throughout the city. Seattle Public Schools monitors changes in enrollment to track expected future needs and would adjust their enrollment projections accordingly for future planning cycle. SPS would respond to the exceedance of capacity as it has done in the past by adjusting school boundaries and/or geographic zones, adding or removing portables, adding/renovating buildings, reopening closed buildings or schools, and/or pursuing future capital programs.

4 Increased density of population and jobs is anticipated to increase the potential demand for police services. The EIS analysis uses a rate of 1.8 officers per 1,000 residents, which is the average rate between 2010 and 2022. Alternative 1 would have lower growth and Alternative 5 and the Preferred Alternative the highest growth with other alternatives in the range. However, many factors can influence crime rates. Property crimes are more prevalent than violent crimes and property crimes such as robbery and motor vehicle theft tend to occur at intersections rather than in whole neighborhoods.

5 Growth in worker and residential populations in the study area is expected to lead to an increased number of calls for aid, basic and advanced life support, and other emergency services. Growth is expected to occur incrementally under all alternatives, as individual development projects are constructed.

6 Growth in residential, commercial, and self-haul solid waste is expected to increase under all alternatives. Alternative 1 would have lower growth and Alternative 5 and the Preferred Alternative the highest growth with other alternatives in the range.

1.6.12 Utilities

How did we analyze Utilities?

Utilities evaluated in this EIS include the public water system, the wastewater system, the stormwater management system, and the electrical system. A review of existing service provider plans and spatial data and contacts with service providers supported the development of the analysis.

Thresholds of significance utilized in this impact analysis include:

- Impacts that would be inconsistent with plans for future utility improvements, development, or growth.
- Impacts that would require major unplanned capital improvements for the utility to serve new developments.

What impacts did we identify?

Citywide

Seattle would experience population and job growth under all the alternatives, which would result in an increase in demand for utility services. While the alternatives have different housing targets the impacts to utilities as a result of the increased demand would be similar. Job targets are the same under each alternative.

Water: None of the alternatives are anticipated to adversely impact water supply. SPU does not have any planned efforts to increase water supply during the 20-year planning horizon for the comprehensive plan. As reported in its Official Yield Estimate and Demand Forecast, SPU forecasts that future demand will remain relatively flat well below the available water supply beyond 2060 despite anticipated population and employment growth due to continued efforts to conserve water and planned reductions in service to its wholesale water customers (SPU 2018, 2019a). SPU currently has a forecasted surplus capacity between 35 and 40 MGD. Individual housing and business developments would need to ensure adequate water supply for drinking water and fire suppression, which could require improvements or upgrades to the existing water distribution system and construction of new service connections where existing infrastructure is undersized. There could be variations in the extent to which water system infrastructure would need to be upgraded or added under each alternative depending on the age, extent, size, and condition of the existing infrastructure and the type of development being planned. For example, a greater degree of utility improvements may be required in urban neighborhood areas for multifamily development than in urban centers.

Wastewater: All alternatives would result in greater demands on wastewater and drainage collection systems through a combination of population growth, water consumption, and the amount of impervious surface as a result of new development. The amount and location of

increased demand, and any impacts as a result, would vary by alternative. Development under all the alternatives would occur in areas with wastewater and, to a lesser extent, drainage capacity constraint risks. The drainage capacity constraint risk areas are generally not concentrated within regional or urban centers and, for the most part, are outside the areas targeted for the highest concentrations of growth. While impervious surfaces from development can increase peak flows and affect conveyance capacity, these impacts could be mitigated by the City's stormwater code requirements for flow control. The West Point treatment plant is already approaching its capacity for maximum month loading (King County 2019). Treatment plant loading rates would continue to increase with population growth under all alternatives; however, the treatment plant may reach maximum month loading capacity under the action aAlternatives ~~2–5~~ sooner than it would under Alternative 1, No Action, due to their higher growth targets.

While there could be variations in the extent to which wastewater and drainage infrastructure would need to be upgraded or added under each alternative depending on the extent and location of additional population growth and development, the nature of the impact between alternatives would generally be the same.

Electricity/Power: All alternatives would result in increased demands on the electrical system due to population and job growth but are not anticipated to have adverse impacts on the electrical system. SCL currently anticipates a modest baseline demand growth of 0.5% per year between 2022 and 2032, which factors in economic growth and electrification of transportation and buildings. A rapid electrification scenario would increase demand by 32% over the baseline during that same period (SCL 2022b). While the action aAlternatives ~~2 through 5~~ target greater household increases than factored into SCL's Electrification Assessment, population growth is less of a consideration for load capacity than electrification of transportation and building systems. For either scenario, SCL will seek to increase energy supply through sustainable and resilient energy resources such as wind and solar while implementing customer demand management and energy efficiency programs (SCL 2022b).

As with the other utilities, development would need to connect to the city's power grid. This could require minor improvements or upgrades to existing electrical infrastructure and construction of new service connections where existing infrastructure is undersized or nonexistent. While there could be variations in the extent to which electrical infrastructure would need to be upgraded or added under each alternative, the nature of the impact between alternatives would be the same.

130th/145th Station Area

Impacts to water, wastewater, and electricity would be the same as described for the citywide evaluation. The 130th/145th Station area is within the Thornton Creek watershed and partially within the Densmore stormwater basin, which is capacity constrained, and includes many blocks with an informal drainage system, including some ditch and culvert systems. Increases in impervious surface due to new development could increase peak flows and potentially affect conveyance capacity. Development in this area would be subject to more stringent stormwater management requirements to avoid adversely affecting conveyance capacity and to protect

water quality. These requirements could include flow control and treatment or the construction of formal stormwater drainage facilities if none are present.

What is different between the Alternatives?

Citywide

As the City has been planning for and directing growth to centers and villages designated in the Seattle 2035 plan, there would be no adverse impacts to utilities. Alternative 2 would result in areas of infrastructure improvements through a greater portion of the city than in Alternative 1, but in a more focused manner than Alternatives 3 and 4.

While there is ample capacity to accommodate growth in the near term for all utilities, the addition of 40,000 more housing units under Alternative 5 and the Preferred Alternative within the planning period would likely exacerbate service constraints during peak periods for wastewater and stormwater without improvements to existing systems.

Under all alternatives, development would require improvements and upgrades to existing utilities and construction of new facilities to accommodate the increased density, which could offset the impact of increased growth through upsizing of service lines and on site or green stormwater infrastructure.

Equity & Climate Vulnerability

Utility infrastructure is vulnerable to the impacts of climate change in a variety of ways such as sea level rise, extreme heat, flooding due to extreme precipitation, and others.

Drainage and Power: Utility infrastructure is vulnerable to the impacts of climate change in a variety of ways such as sea level rise, extreme heat, flooding due to extreme precipitation, and others.

- **Sewer/Drainage**: The City's wastewater and drainage systems are vulnerable to sea level rise that could inundate conveyance pipes and facilities, particularly those facilities that lie within the 100-year floodplain. More frequent and extreme storm events can damage transmission lines and cause power outages.
- **Power:** Seattle's electrical power relies on hydroelectric sources, which rely on water supplies vulnerable to reduced winter snowpacks and drought. More frequent and extreme storm events can damage transmission lines and cause power outages.

Areas 7 and 8 in particular have vulnerable populations and are more susceptible to climate change impacts such as flooding and heat island effects.

- Alternative 1 plans for 8,500 households to Areas 7 and 8, primarily to existing urban centers in Area 8.
- Alternative 5 adds approximately 17,500 households in Areas 7 and 8, primarily in regional center and urban neighborhood areas in Area 8.

- Alternatives 2 through 4 and the Preferred Alternative are in this range.

Growth in these areas may require a greater degree of investment in improved drainage and electrical utilities to overcome these vulnerabilities.

130th/145th Station Area

Alternative 2 would lead to greater demand on utilities than Alternative 1 with the designation of several neighborhood centers in the area, as would ~~and particularly~~ Alternative 5 and the Preferred Alternative, ~~with an~~which designate an urban center on both sides of I-5 in addition to the neighborhood center around the 145th Street station. ~~would lead to greater demand on utilities than under Alternative 1, along with a~~This would provide greater opportunity for utility improvements within the area, particularly related to stormwater management in an area designated as capacity constrained.

~~Under Alternative 5 w~~While new development under Alternative 5 and the Preferred Alternative ~~has~~ would have the benefit of improving utility infrastructure, this development would occur within a capacity constrained stormwater basin, which may be a constraint on the extent of new development and resulting increase in impervious surface if stormwater cannot be managed on site or through improved conveyance infrastructure.

What are some solutions or mitigation for impacts?

Citywide

A number of regulations apply to new development to ensure adequate utilities.

The Comprehensive Plan includes a Utilities Element that lists policies and goals to ensure safe, reliable, and equitable service and growth throughout the city; protect water quality; and encouraging energy efficiency and renewable resources.

King County, SPU, and SCL regularly plan and adapt to changing growth patterns and are currently engaged in efforts to improve wastewater and stormwater capacity, reduce water and electrical demand, and increase the resiliency of their utility systems against the impacts of climate change. City codes regulating construction and utilities will continue to ensure new development addresses any service or capacity constraints.

While each alternative has the potential to impact utilities through increased demand, none of these impacts are identified as significant adverse impacts. King County, SPU, and SCL regularly plan and adapt to changing growth patterns and are currently engaged in efforts to improve wastewater and drainage system capacity, reduce water consumption and electrical demand, and increase the resiliency of their utility systems against the impacts of climate change. City codes regulating construction and future utility investments will continue to ensure new development addresses any service or capacity constraints. See **Section 3.12.3**.

130th/145th Station Area

See citywide.

With mitigation, what is the ultimate outcome?

No significant unavoidable adverse impacts to utilities are anticipated under any of the alternatives as a result of the City's Comprehensive Plan update. Population and job growth under all alternatives would increase demand on the City's water, wastewater, drainage, and electrical systems and, for the action alternatives, exceed the planned growth anticipated in the utilities' planning forecasts. However, the utilities are anticipated to accommodate this growth through a combination of existing and future anticipated supply, demand management, and upgrades to existing infrastructure and facilities to improve capacity, operation, and reliability.

In areas considered capacity constrained for stormwater runoff, such as those areas with informal ditch and culvert systems, development would be subject to more stringent stormwater management requirements to avoid adversely affecting conveyance capacity and protect water quality. These requirements could require construction of formal drainage facilities to treat and manage the flow of stormwater as well~~There would be no significant unavoidable adverse impacts to utilities under any of the Alternatives. Services generally have capacity to serve, and where there are deficiencies in current infrastructure, there are plans and regulations to ensure that there is proper connection and sizing.~~

Summary of Thresholds

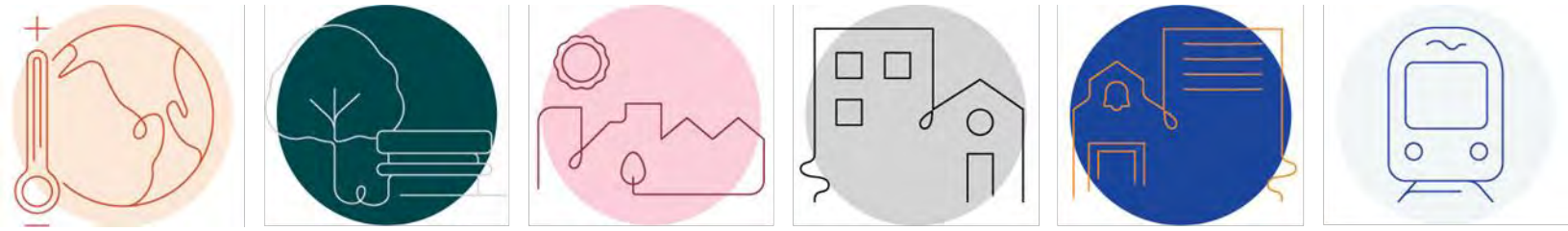
Exhibit 1.6-34 summarizes potential impacts based on the evaluation in **Section 3.12 Utilities**.

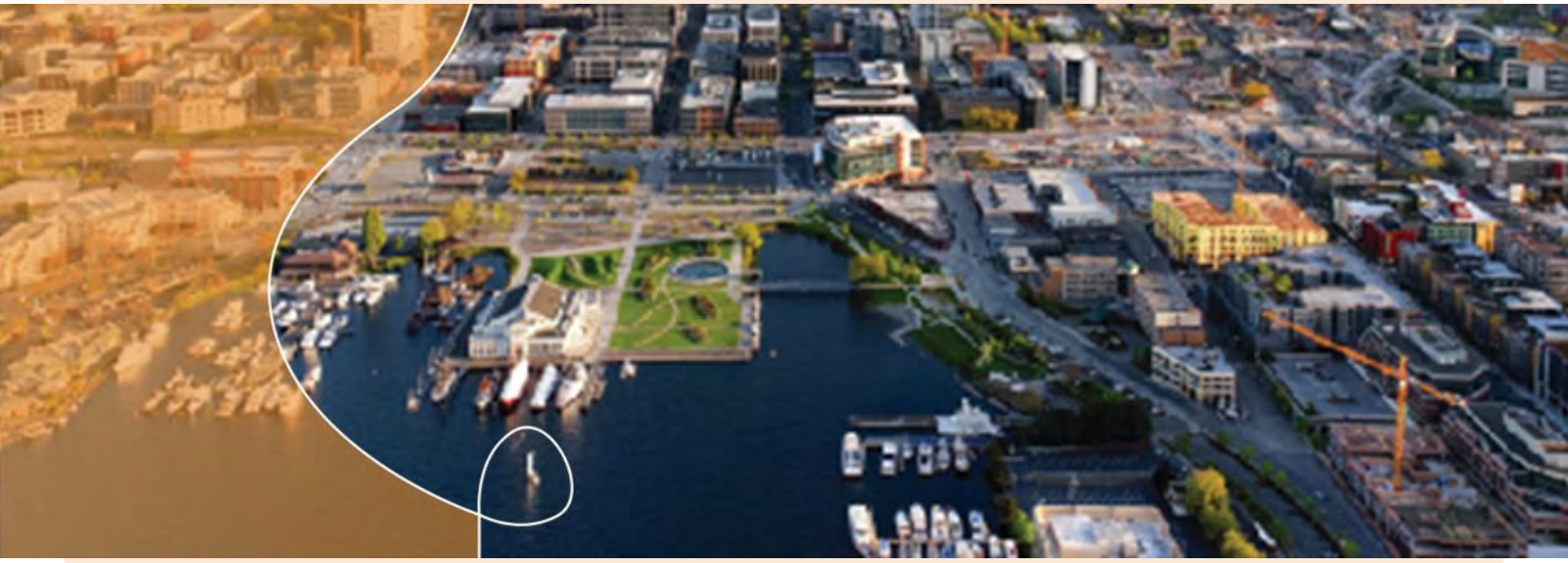
Exhibit 1.6-34. Utilities Impact Thresholds and Alternative Comparison

Metric	Threshold	Alt. 1	Alt. 2	Alt. 3	Alt. 4	Alt. 5	Pref.
	Impacts that would be inconsistent with plans for future utility improvements, development, or growth.[1]	▽	▽	▽	▽	▽	▽
	Impacts that would require major unplanned capital improvements for the utility to serve new development.[1]	▽	▽	▽	▽	▽	▽

Note: Impacts are considered either unavoidable adverse (▼▼), adverse but able to be mitigated (▼), impact but less than adverse (▽), limited or none (—), moderately positive (△), or positive (▲). The Preferred Alternative was added to this exhibit since the Draft EIS—no changes were made to the impact summary for Alternatives 1–5.
1 Seattle would experience population and job growth under all the alternatives, which would result in an increase in demand for utility services. Service providers for water, wastewater, drainage, and power regularly plan and identify improvements to ensure wastewater and drainage system capacity, reduce water consumption and electrical demand, and increase the resiliency of their utility systems against the impacts of climate change.

2 PROPOSAL & ALTERNATIVES





Source: City of Seattle, 2023.

2.1 Introduction

This Chapter of the EIS describes the One Seattle Comprehensive Plan Update proposal and alternatives.

2.1.1 Overview of the Proposal

Seattle's Comprehensive Plan is the vision for how Seattle grows and makes investments. The Plan's goals and policies and land use plan guide decisions about where the City should expect and support new housing and jobs, and where the City invests in transportation, utilities, parks, and other public assets. The Plan must be updated by 2024 to address state and regional goals and requirements with implementing regulations regarding middle housing due by 2025. The Plan will also address racial inequities, housing costs, access to economic opportunity and education, and climate change. As part of the One Seattle Plan Update, the City will consider updates to zoning and development regulations to implement the Plan. ~~Draft~~ EIS alternatives vary levels, types, and locations of growth and investment. ~~Five~~ Six alternatives are described further in **Section 2.4** below:

- **Alternative 1: No Action**—The No Action Alternative is required under the State Environmental Policy Act (SEPA). It would continue implementation of the current Seattle 2035 Comprehensive Plan. The No Action Alternative for the One Seattle Plan maintains the status quo of focusing most housing and jobs within existing urban centers and villages with no change to land use patterns. It also incorporates changes proposed as part of the recent Industrial and Maritime Strategy EIS. It would meet regionally set growth targets including 80,000 new homes and 158,000 jobs for the period 2024-2044.
- **Alternative 2: Focused**—Alternative 2 includes the creation of additional areas of focused growth called neighborhood centers to create more housing around shops and services. Neighborhood centers would be similar to existing urban villages in that they would allow a wide range of housing types and commercial space, but with a smaller geographic size and lower intensity of allowed development. This alternative would result in a greater range of housing options with amenities and services in many neighborhoods. For the period 2024-2044, Alternative 2 includes more housing than Alternative 1 at 100,000 new homes. Eighty thousand homes would be located in a similar distribution to Alternative 1, with the 20,000 additional homes accommodated in neighborhood centers. Like Alternative 1, Alternative 2 includes 158,000 new jobs, but their distribution would vary. Compared to Alternative 1, about 15% of new jobs in Alternative 2 and the other action alternatives are assumed to be located in proportion to the location of new housing. This assumption accounts for the desire of businesses like local retail, restaurants, and services to locate near housing.
- **Alternative 3: Broad**—Alternative 3 allows a wider range of low-scale housing options, like triplexes and fourplexes, in all Neighborhood Residential zones as part of the urban neighborhood place type. Alternative 3 proposes a total housing growth of 100,000 housing units (20,000 more than Alternative 1) to account for the potential additional housing demand that could be met with broad zoning changes. Eighty thousand units would be

Place Types

See **Exhibit 2.1-1**.

- **Regional Centers** are regionally designated places with a diverse mix of uses, housing, and employment. They include several centers that comprise greater Downtown along with the University District and Northgate. These contain Seattle's densest neighborhoods and a large share of the city's jobs.
- **Urban Centers** are dense, walkable, mixed-use places with a wide range of housing and businesses located near transit, amenities, and jobs.
- **Neighborhood Centers** are places with a wide range of housing and businesses that primarily serve the local community. These areas resemble urban villages, but with a smaller size and lower intensity of allowed development.
- **Corridors** are areas near frequent transit and large parks that allow a wide range of housing types in areas currently zoned primarily for detached homes (within a 10-minute walk from a light rail station and a five-minute walk from frequent bus transit service and entrances to large parks). Corridors also include areas already zoned for multifamily and commercial use and could have small increases in height.
- **Urban Neighborhoods** represent low-scale primarily residential areas. This place type would primarily allow housing types within a three-story scale, such as detached homes, duplexes, triplexes, fourplexes, and stacked flats. This place type would allow flexibility for new forms of housing in areas currently zoned primarily for detached homes.
- **Manufacturing and Industrial Centers** are regionally designated industrial job centers. The One Seattle Plan process would not change the boundaries of these centers nor the goals and policies for these areas, which were recently updated as part of the Industrial and Maritime Strategy.

located in a similar distribution to Alternative 1, with the 20,000 additional homes accommodated in new housing types in Neighborhood Residential zones. Job growth would be the same as Alternative 1, but 15% of jobs would be located near new housing.

- **Alternative 4: Corridor**—Alternative 4 allows a wider range of housing options only in corridors to focus growth near transit and amenities. This alternative would increase production of both ownership and rental housing options in various neighborhoods and support City and regional investment in transit. Eighty thousand units would be located in a similar distribution to Alternative 1, with 20,000 additional homes accommodated in new housing types in the corridors, for a total of 100,000 new homes. Job growth would be the same as Alternative 1, but 15% of new jobs would be located near new housing to provide local shopping and services.
- **Alternative 5: Combined**—Alternative 5 contemplates the largest increase in supply and diversity of housing across Seattle. It includes the strategies for encouraging housing growth in Alternatives 2, 3, and 4 plus additional changes to existing urban center and village boundaries and changes to new place type designations. Alternative 5 assumes 120,000 new housing units (40,000 more than Alternative 1) to account for the potential additional housing demand that could be met within the areas of change identified in Alternatives 2, 3, and 4 as well as changes to existing and new centers and villages. Eighty thousand units would be located in a similar distribution to Alternative 1, with the additional 40,000 units accommodated multiple areas of change. Job growth would be the same as Alternative 1. The distribution of jobs and housing would be a combination of the other alternatives.

- **Preferred Alternative: Mayor's Recommended Plan**—the Preferred Alternative includes the Mayor's Recommended Growth Strategy reflected in the proposed One Seattle Comprehensive Plan and the One Seattle Zoning Update. These plans and implementing zoning consider the public comment during the Draft EIS and Draft Plan comment periods and public engagement opportunities. Growth is proposed similar to Alternative 5 totals at 120,000 new dwellings (40,000 more than Alternative 1) and the same jobs of 158,000 jobs for the period 2024-2044.

In addition to reviewing conditions and impacts citywide, this EIS also provides a focused review of the 130th and 145th Street Station Area Plan and options for the City to streamline future environmental review in that area, which may include a planned action (RCW 43.21c.440), infill exemption (RCW 43.21C.229), or other tools available under state legislation (e.g., SB 5818).

Place Types

The City is developing a growth strategy and draft plan in parallel with the ~~Draft~~ EIS. The City anticipates renaming place types adopted in the current Seattle 2035 Comprehensive Plan. Text, tables, and maps addressing existing conditions or Alternative 1 use the City's adopted place type names as listed in the existing Seattle 2035 plan. For Alternatives 2, 3, 4, and 5, the new place type names are used. See **Exhibit 2.1-1**.

Exhibit 2.1-1. Place Type Names

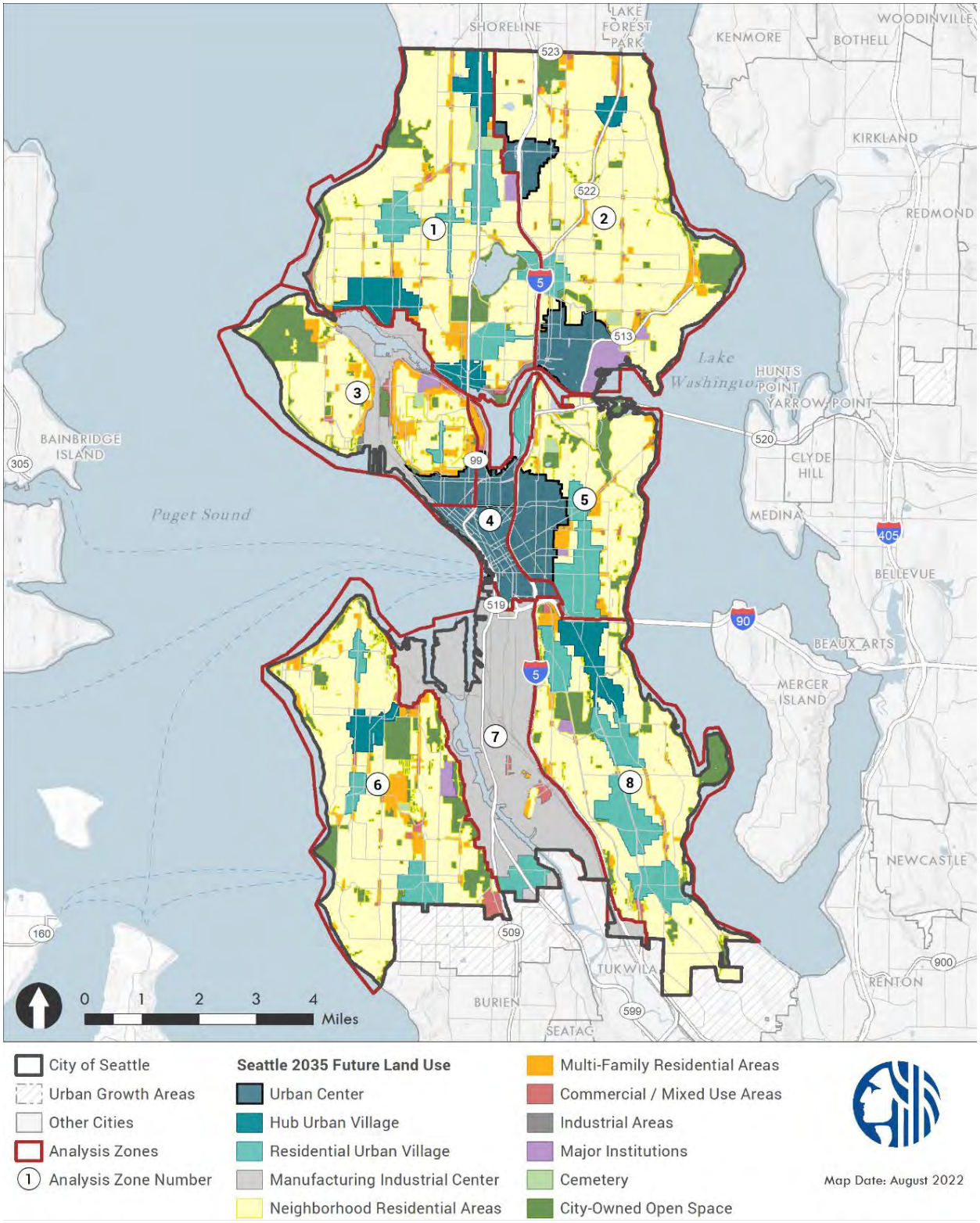
Alternative 1, No Action, (Seattle 2035) Place Type Names	Place Type Name in EIS Scoping Documents 2022	Alternatives 2, 3, 4, and 5 Place Type Names in ~~Draft~~ EIS	Preferred Alternative
Urban Center	Urban Center	Regional Center	Regional Center - Metro Regional Center - Urban
Hub Urban Villages Residential Urban Villages	Urban Village	Urban Center	Urban Center
(new place type)	Neighborhood Anchor	Neighborhood Center	Neighborhood Center
(new place type)	Corridors	Corridors	Urban Neighborhood - Frequent Transit Corridor
(new place type)	Neighborhood Residential	Urban Neighborhood	Urban Neighborhood - Neighborhood Residential Urban Neighborhood - Other Multifamily
Manufacturing & Industrial Center	Manufacturing & Industrial Center	Manufacturing & Industrial Center	Manufacturing-Industrial Center

Source: City of Seattle, 2023 and 2024.

2.1.2 Study Area

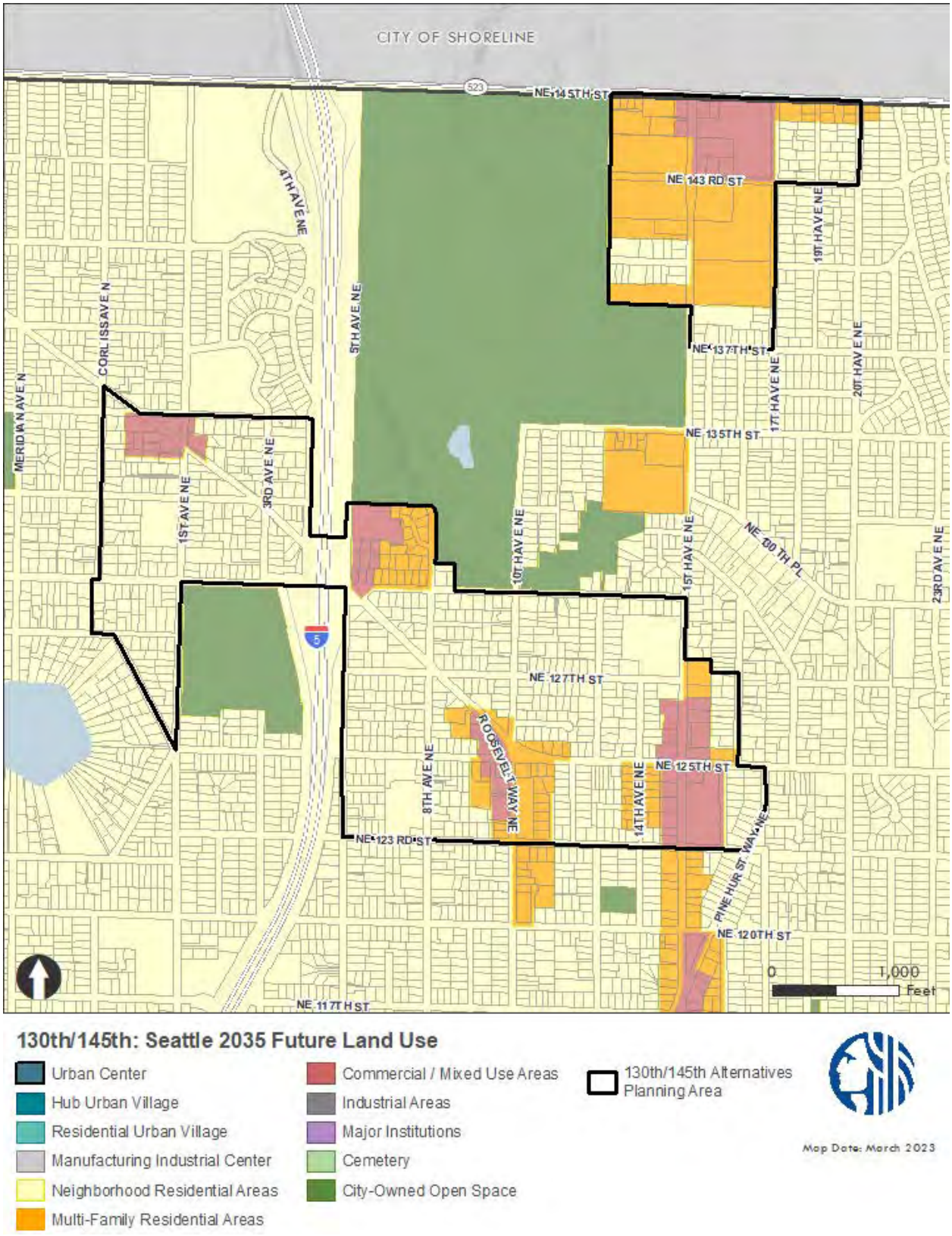
The study area includes the full city limits. The city has been divided into regions based on road and natural features to organize the EIS evaluation and results. See **Exhibit 2.1-2**. A subarea is reviewed in greater detail at the 130th and 145th Station Area as a result of a station area planning process ongoing since 2019. See **Exhibit 2.1-3**.

Exhibit 2.1-2. Study Area



Note: See **Exhibit 2.1-1** for a crosswalk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~A~~lternatives ~~2-5~~.
Sources: City of Seattle, 2022; BERK, 2022.

Exhibit 2.1-3. 130th/145th Subarea



Sources: City of Seattle, 2022; BERK, 2022.

2.1.3 Objectives of the Proposal

SEPA requires a statement of the proposal's objectives and the purpose and need to which the proposal for the Comprehensive Plan Update is responding. Alternatives are different means of achieving the proposal's objectives.

The objectives of the update include:

- Equity:
  - Provide equitable access to housing, jobs and economic opportunities, services, recreation, transportation, and other investments.
  - Center the work with an intersectional, race-conscious lens, informed by a history of racial discrimination and disinvestment.
- Livability: Foster complete neighborhoods where more people can walk or bike to everyday destinations such as local shops, parks, transit, cultural amenities, and services.
- Affordability: Increase the supply of housing to ease increasing housing prices caused by competition for limited supply and create more opportunities for income-restricted affordable housing.
- Inclusivity:
  - Increase diversity of housing options in neighborhoods throughout Seattle to address exclusivity and allow more people to live and stay in a variety of neighborhoods.
  - Reduce residential displacement and support existing residents, particularly low-income households, who are struggling to stay in their neighborhoods.
- Climate resiliency: Reduce emissions from buildings and transportation and promote adaptations to make our city more capable of withstanding the impacts of climate change.
- Consistency with other plans and policies: Meet state and regional policies and requirements for the Comprehensive Plan Update including but not limited to growth and housing affordability targets.

In addition to the citywide objectives, the objectives for 130th and 145th Station Area are contained in the vision statement in the "130th & 145th Station Area Planning Plan for Public Review," July 2022:

> *The 130th and 145th Station Area is a lively, walkable, and welcoming North Seattle neighborhood. Major streets have roomy, tree-lined sidewalks, and other green infrastructure. Bicycle infrastructure makes everyday trips to transit stations, schools, and neighboring urban villages enjoyable and safe. An array of housing offers options affordable to a broad range of incomes and lifestyles. Small shops and cafes near the station cater to locals, commuters, students, and visitors. Local and citywide lovers of nature, recreation and culture treasure the abundant greenspaces and unique cultural events so easily reached by walking, biking, or transit.*

2.2 Planning Context & Outreach

2.2.1 Seattle Comprehensive Plan

The Seattle Comprehensive Plan, *Seattle 2035*, is a 20-year vision and roadmap for Seattle's future. The plan guides City decisions on where to build new jobs and houses, how to align growth with the transportation system, and where to make capital investments such as utilities, sidewalks, and libraries. Seattle 2035 is the framework for most of Seattle's big-picture decisions on how to grow while preserving and improving the city's neighborhoods.

The Comprehensive Plan was first adopted in 1994 consistent with the Washington State Growth Management Act (GMA). Less extensive revisions and updates are incorporated on an annual basis and major "periodic reviews" were completed in 2004 and 2016. The One Seattle Comprehensive Plan Update is the next major periodic review.

Volume 1 of the Seattle 2035 Comprehensive Plan consists of fourteen major elements, all of which will be reviewed and updated as part of the proposal:

1. Growth Strategy (Urban Village) Element
2. Land Use Element
3. Transportation Element
4. Housing Element
5. Capital Facilities Element
6. Utilities Element
7. Economic Development Element
8. Environment Element
9. Parks and Open Space Element
10. Arts and Culture Element
11. Community Well-Being Element
12. Community Engagement Element
13. Container Port Element
14. Shoreline Element

The four core values of Seattle's Comprehensive Plan are:

- **Race and Social Equity**—limited resources and opportunities must be shared; and the inclusion of under-represented communities in decision-making processes is necessary
- **Environmental Stewardship**—protect and improve the quality of our global and local natural environment.
- **Community**—developing strong connections between a diverse range of people and places.
- **Economic Opportunity and Security**—a strong economy and a pathway to employment is fundamental to maintaining our quality of life.

Volume 2 of the Comprehensive Plan consists of the City's 38 adopted neighborhood plans.

Urban Village Strategy

The urban village strategy is the foundation of Seattle's existing Comprehensive Plan. It is the City's unique approach to meeting the state GMA requirement and resembles VISION 2050's growth centers approach. This strategy concentrates most of the city's expected future growth in specific designated areas. The City has designated four place types with distinct functions and varying amounts and intensity of growth and mixes of land uses:

1. **Urban centers** are the densest Seattle neighborhoods. They act as both regional centers and local neighborhoods that offer a diverse mix of uses, housing, and employment opportunities.
2. **Hub urban villages** are communities that offer a balance of housing and employment but are generally less dense than urban centers. These areas provide a mix of goods, services, and employment for their residents and surrounding neighborhoods.
3. **Residential urban villages** are areas of residential development, generally at lower densities than urban centers or hub urban villages. While they are also sources of goods and services for residents and surrounding communities, for the most part they do not offer many employment opportunities.
4. **Manufacturing/industrial centers (MICs)** are home to the city's thriving industrial businesses. Like urban centers, they are important regional resources for retaining and attracting jobs and for maintaining a diversified economy.

The City is considering renaming the center names and adding others in the alternatives. See **Exhibit 2.1-1**.

Community Planning

The Growth Management Act allows for subarea plans that study smaller areas than the city as a whole to evaluate local conditions. In the past, the City has prepared neighborhood plans and adopted portions into the Comprehensive Plan.

According to Puget Sound Regional Council (PSRC) regional center requirements and VISION 2050, by 2025 the City must prepare a subarea plan for each designated regional growth center and manufacturing industrial center, including:

- Downtown
- First Hill/Capitol Hill
- Northgate
- South Lake Union
- University Community
- Uptown
- Greater Duwamish Manufacturing Industrial Center
- Ballard–Interbay Manufacturing Industrial Center

Adopted in July 2022, the *130th and 145th Station Area Plan* outlines the community's and City's concepts for land use, mobility and other policies and investments to support a regional transit investment at both locations (light rail station and bus rapid transit station, respectively). The planning process has been ongoing for several years at the time of this writing. Based on a Washington Department of Commerce grant to facilitate facilitated environmental review, this EIS addresses the subarea plan and implementing zoning alternatives (described in **Section 2.2.3 130th/145th Station Area Plan**).

The City has policies guiding the preparation of new or amended community plans in collaboration with community members, and to help allocate available resources, currently in the Community Involvement chapter of Seattle 2035 Comprehensive Plan.

Future Land Use & Existing Zoning

The City of Seattle's Future Land Use Map (FLUM) is part of the Comprehensive Plan and expresses spatially the 20-year vision of preferred land use patterns to guide development within the city. The existing FLUM identifies urban centers, hub urban villages, residential urban villages, and manufacturing/industrial centers as well as four other land use types—neighborhood residential areas, multifamily residential areas, commercial/mixed-use areas, and industrial areas—that suggest specific uses outside centers and villages. The FLUM also designates major institutions, cemeteries, and City-owned open space.

The future land use designations are implemented by a corresponding range of zoning districts and development regulations established in Title 23 of the Seattle Municipal Code (SMC). Each land use area may include different levels of zoning that provide more detail about what can be built. Zoning in Seattle is broadly categorized into the following major classifications:

- Neighborhood Residential
- Multifamily residential
- Commercial
- Industrial
- Seattle Mixed
- Downtown

Zoning overlays also exist in certain locations, such as around major institutions and in master planned communities. Property in an overlay district is subject to both its zone classification regulations and additional requirements of the overlay district, which supersede any conflicting provisions of the underlying zone.

2.2.2 Equity & Climate Vulnerability

The City seeks to develop a plan that results in more equitable outcomes, reduces harms, and supports community-wide benefits created by growth and investment. This section describes some of the equity and climate work that informed our review of the alternatives. **Section 1.6** summarizes findings of the alternatives and their relationship to equity and climate vulnerability.

Definitions

- **Race and Social Equity:** when all marginalized people can attain those resources, opportunities, and outcomes that improve their quality of life and enable them to reach their full potential. The city has a collective responsibility to address the history of inequities in existing systems and their ongoing impacts in Seattle communities, leveraging collective resources to create communities of opportunity for everyone, regardless of race or means. (Seattle Resolution 31577).
- **Equity:** Everyone has fair and unbiased access to the resources they need to meet their fundamental needs and fully participate in the life of their community. (Seattle 2035).
- **Displacement:** The relocation of residents, businesses, or institutions from an area due to the burdens placed on them by the rising cost of housing or commercial space.
- **Climate Vulnerability:** The propensity or predisposition of people, resources, ecosystems, infrastructure, and services to be adversely affected by climate stressors/hazards. Vulnerability encompasses exposure, sensitivity, potential impacts, and adaptive capacity. (US Climate Resilience Toolkit, 2022)
- **Objective:** A description of the City's intent or desired result.
- **Performance Metric:** Measurable data or qualitative information used to track objectives.

PolicyLink Racial Equity Analysis

Prior to the start of the One Seattle Plan process, the City worked with the organization PolicyLink to conduct a racial equity analysis of the current Comprehensive Plan. This work highlighted persistent racial disparities in Seattle related to housing, neighborhood access, and economic prosperity. The work raised concerns that our existing growth strategy is reinforcing a pattern of racial segregation and exclusion and identified numerous policies and tools that the City could consider addressing existing disparities. The alternatives considered in this EIS are meant to address some of these concerns by increasing the supply and diversity of housing in neighborhoods throughout Seattle.

Climate Change

The city is experiencing the impacts of climate change including extreme heat, smoky air from wildfires, sea-level rise, and extreme precipitation and flooding. Seattle created a climate action plan in 2011 and adopted a goal for the community to become carbon neutral by 2050. The City is not on track to meet all goals to reduce carbon pollution, and more coordination and action is needed. The Seattle Climate Action Plan, adopted in 2013, and the Seattle Climate Strategy, released in 2018, establish short- and long-term actions for addressing climate change.

Equity & Environment Agenda

The City of Seattle is committed to environmental justice for people of color, low-income households, and others disparately affected by historic decisions on land use and infrastructure that affect housing, health, and other aspects of quality of life. The City has created an Environmental Justice Committee that developed an Equity and Environment Agenda with the following vision:

> *We are steadfast in our pursuit of Environmental Justice, redefining our environment as not just the natural environment, but also where we work, worship, play, learn and live. We believe in a world that respects communities' histories and cultures, and that uplifts self-determination and full participation. We know that communities of color are creative, resourceful, and resilient, and deeply care about the environments in which they live. Given that, we believe in environmental solutions that connect to and create economic and educational opportunities so that all communities can thrive. To do this necessitates addressing past systemic injustice while creating proactive, transformational solutions for the future.*

The Equity and Environment Agenda is also based on the following principles:

> *Community Driven Strategies: We believe in community self-determination, influence, and leadership. We know that communities are resilient and resourceful, and that tapping into their own collective cultural cornerstones of environmental sustainability is key to ownership of initiatives and other efforts, as well as reducing invisibility.*
>
> *The Influence and Decision-Making of Those Most Affected: We believe that communities who are deeply affected by environmental issues should be highly involved throughout decision-making processes in meaningful and culturally appropriate ways.*
>
> *Strong Accountability: We believe that affected communities deserve strong, accountable, transparent, accessible, and culturally appropriate solutions that include ongoing oversight of government and other entities to address the negative impacts they have experiences.*
>
> *Solutions That Recognize Complexity and Interdependence: We believe in doing no harm, here or anywhere. We recognize that all places and people are interconnected, and commit to an approach of collective liberation, which recognizes that the liberation of each person is the liberation of all people.*

Section 3.6 Land Use Patterns & Urban Form includes an overview of past land use policies and other previous actions that had inequitable outcomes.

2.2.3 130th/145th Station Area Plan

Adopted in 2022, the *130th and 145th Station Area Plan* outlines the community's and City's concepts for land use, mobility, and other policies and investments to support a regional vision for integrating fast and reliable transit with compact walkable communities. The Plan is intended to guide decisions for public and private investment near these high-capacity transit stations. Topics addressed in the plan include land use, mobility, housing, open space, and other community needs. Goals, strategies, and early actions included in the Plan are guided by the following vision:

> *The 130th and 145th Station Area is a lively, walkable, and welcoming North Seattle neighborhood. Major streets have roomy, tree-lined sidewalks, and other green infrastructure. Bicycle infrastructure makes everyday trips to transit stations, schools, and neighboring urban villages enjoyable and safe. An array of housing offers options affordable to a broad range of incomes and lifestyles. Small shops and cafes near the station cater to locals, commuters, students, and visitors. Local and citywide lovers of nature, recreation and culture treasure the abundant greenspaces and unique cultural events so easily reached by walking, biking, or transit.*

The station area in the *130th and 145th Station Area Plan* includes the area within a half-mile (about a 10-minute walk) of the 130th and 145th Link stations, and within a quarter-mile (about a 5-minute walk) of the NE 145th St/15th Ave NE Stride bus rapid transit (BRT) station. The Plan also considers a larger study area that includes communities that can access the stations by a longer walk or a short bike or bus ride.

2.2.4 Public Outreach

Community engagement for the Comprehensive Plan Update is occurring over four phases:

1. Listen & Learn: Winter & Spring 2022
2. Shape the Plan: Summer 2022 – Fall 2023
3. Review & Refine: Fall 2023 – Fall 2024
4. Adopt and Look Ahead: Fall 2024 – 2025

Each phase has distinct objectives and activities that are planned to engage community members and key stakeholders in identifying issues, developing policy concepts, and shaping the final recommended plan that will be considered by the City Council in 2024.

As part of this process. additional engagement will inform legislation that will make changes to zoning and development standards necessary to implement the Comprehensive Plan.

The engagement process is a citywide effort to engage with a wide and inclusive range of communities, including residents, neighborhood and community groups, cultural organizations, businesses, advocacy organizations, and other public and private agencies. The City recognizes that Seattle's many issue- and community-based groups represent an existing knowledge base

around both the technical aspects and quality of life implications of the Plan Update. The City seeks to build upon and foster relationships with a diversity of groups in order to gain feedback and insights on the Plan's policies and issue areas. In addition, the City is focusing community engagement resources on centering race and equity in the One Seattle engagement process in keeping with the Equitable Community Engagement Ethos. Engagement efforts are targeted to uplift the voices of people and communities who have been historically and systematically excluded from policy decision making. This equity-driven focus includes BIPOC communities, low-income populations, renters, limited-English populations, people experiencing homelessness, youth, elders, the LGBTQ+ community, and other historically underserved communities.

Phase 1 Engagement

During Phase 1, the City began implementing three key engagement strategies:

- **Online engagement strategies designed to reach more people than in-person engagement alone, lowering barriers to engagement and encouraging participation across the city and beyond.** Online engagement included the One Seattle Plan Project Website (viewed 4,972 times from January to June of 2022); 54,954 impressions via OPCD's Twitter and Facebook; media coverage; and launching the One Seattle Plan Engagement Hub. As of the Phase 1 Engagement Report, OPCD had received 10,243 feedback comments relating to the One Seattle Plan through the Engagement Hub, and the page had been viewed 6,447 times.
- **Collaborative engagement partnerships with community-based organizations and Community Liaisons.** OPCD partnered with five community-based organizations to help design and carry out public engagement strategies for the update. Each organization worked with OPCD to create and refine a unique engagement workplan that centers the voices, needs, and visions of the BIPOC communities they serve and whom have been historically underrepresented in City planning and engagement processes. The five organizations are the Asian Pacific American Labor Alliance (APALA), the Capitol Hill Eco District, Duwamish Valley Sustainability Association / Duwamish Valley Youth Vision Project, Estelita's Library, and Khmer Community of Seattle/King County / Noio Pathways/ KIMYUNITY. Each community-based organizations were compensated for their work through 12-month contracts at $30,000 each. In partnership with the Department of Neighborhoods, OPCD also contracted with a cohort of ten Community Liaisons to develop and carry out broad and deep engagement to amplify the voices of key underrepresented communities. OPCD's community liaison cohort is collectively conversant in Somali, Amharic, Oromo, Vietnamese, Chinese (Mandarin), Cham, and Spanish and has worked to engage with populations speaking these languages as well as with African American, Indigenous, Latinx, older adults, people with disabilities, and unhoused people across Seattle.
- **Leveraging existing City relationships and coordinated with outreach to key stakeholders.** Over the course of Phase 1, OPCD presented to City Council three times and attended and presented to both liaisons and full board meetings of 21 Boards and

Commissions. OPCD also met periodically with the Equitable Development Initiative (EDI) Advisory Board to obtain feedback on key elements of the One Seattle Plan and worked with the Indigenous Seattle Workgroup to ensure that our engagement is also specifically tailored to the indigenous community.

The City heard from 2,348 individuals in the Phase 1 Survey and through the 1,001 registered users of the Engagement Hub. In the Phase 1 Survey, the subjects identified as being the highest priority for being addressed in the One Seattle Plan were: **housing availability and affordability, transportation and mobility, climate change**, and **racial and social equity**. The prioritization of these top three elements—Housing, Transportation, and Climate Change, in this order, remained the same across categories of race/ethnicity, homeownership, age, and gender. The next three most frequently discussed Plan elements were economic development, parks and open space, and community well-being.

The vast majority of feedback about Seattle's need for new housing focused on the critical need for more affordable housing. Respondents also desire varied housing choices (duplexes, triplexes, and fourplexes; two and three-bedroom apartments; and condominiums and co-ops to provide ownership opportunities) and increased density in and around urban villages, other activity centers, and major amenities. Transportation comments focused on expanded public transit and improving alternative transportation (biking, rolling, and walking) safety, convenience, and access. The two biggest climate threats identified by commenters were air quality and extreme temperatures. Respondents frequently cited air pollution, wildfire smoke, hot and cold weather changes, and the related health implications in communities, particularly among those communities most vulnerable to these extreme shifts. Other climate concerns included water-related climate threats (rain, droughts, heavy rain/flooding, water scarcity, sea-level rise, water table rise, ocean acidification, and water pollution) and concerns about trees and green space (specifically loss of tree canopy).

Around 25% of respondents identified as BIPOC and 75% identified as White (compared to Seattle's BIPOC population of around 33%). While the City heard from a smaller percentage of BIPOC respondents than we would have liked in Phase 1, the comments received from BIPOC respondents tended to mirror those of White respondents in terms of the priorities they wished to see represented in the One Seattle Plan. Comments about equity envisioned equitable access to resources like parks and green spaces, community centers, medical facilities, grocery stores, libraries, and schools. Comments about race touched on improved equity for BIPOC community members—specifically around income, wealth and generational wealth, housing, and gentrification and displacement concerns—and comments about the need to address climate-vulnerable populations mentioned the need for equitable, environmentally just investments.

See the Phase 1 Engagement Report for a more detailed summary of engagement efforts, partners, and feedback.

Phase 2 Engagement

Between November 2022 and January 2023, OPCD engaged community members around the Comprehensive Plan Update by continuing the strategies in Phase 1 and also hosting a series of five in-person community meeting. The meetings took place in neighborhoods across Seattle. Each meeting started with a half-hour open house where participants were encouraged to review poster boards with information on various topics, discuss questions about each element of the Plan with OPCD and related City staff (OSE, SPR, and SDOT), and use sticky notes to provide written responses to question prompts on each element's poster. Attendees then divided themselves into small groups of 8-14 people. Each group was paired with a staff facilitator and staff notetaker and then engaged in two 40-minute community conversations focused on two topics: 1) access to housing options, and 2) creating complete communities.

In Spring 2023 the City shared summaries of engagement through partnerships with seven Black, Indigenous People of color (BIPOC) led and serving Community-Based Organizations (CBOs). Each of these groups designed & implemented engagement that centered the voices and needs of people of color in informing how we will grow and invest in our communities in the coming years. These reports detail their tailored outreach activities and strategies employed in their engagement work.

Next Steps: Phase 3 & 4 Engagement

The City ~~intends to~~ conducted additional rounds of engagement after the release of ~~this~~ the Draft EIS to receive feedback on the draft plan and Draft EIS and on draft zoning maps and legislation that would help implement this plan. ~~We anticipate this~~The engagement ~~will~~ included various approaches for engagement, including in-person meetings and online options. Additional information about public outreach is available on the One Seattle Engagement Hub. See also a hub for the zoning proposals available at: One Seattle Zoning Implementation Hub.

2.3 SEPA Process

2.3.1 Environmental Review

Process

Under SEPA, agencies conduct environmental review of actions that could affect the environment. Preparation of an EIS is required for actions that have the potential for significant impacts. An EIS is a useful tool that provides detailed information to the public, agencies, tribes, and City decision-makers about the environmental effects of a plan or project before a decision is made. As described below and in **Chapter 1,** this document is a non-project EIS that analyzes

the proposal and various alternatives outlined in **Section 2.4** broadly across the study area (WAC 197-11-442).

The EIS process involves the following steps: (1) scoping the contents of the EIS with agencies, tribes, and the public; (2) preparing a draft EIS with a comment period; (3) preparing a final EIS that responds to comments and may develop a preferred alternative; and (4) developing legislation to implement the proposal. With the issuance of the Final~~Draft~~ EIS, the EIS process is in phase 3~~2~~.

Non-Project EIS

This document is a non-project EIS that analyzes a range of legislative changes that will implement One Seattle Plan and alternatives broadly across the study area. SEPA identifies that a non-project EIS is more flexible and studies a range of alternatives comparatively to support the consideration of plans, policies, or programs (WAC 197-11-442). A non-project EIS does not provide detailed site-specific analysis. Additional environmental review may occur when other project or non-project actions are proposed in the city in the future if they are not SEPA exempt. Future review could occur in the form of supplemental EISs, SEPA addenda, or determinations of non-significance.

2.3.2 Public Comment Opportunities

Scoping

The scoping process is intended to identify potential significant impacts on the built and natural environment that should be considered and evaluated in the EIS. The City published a scoping notice and fact sheets on June 23, 2022. While the typical scoping comment period is 21-30 days, the City extended the period to 60 days and closed the comment period on August 22, 2022. Virtual scoping meetings were held during the comment period at 11:00 AM on June 29 and 7:00 PM on July 19, 2022, with a third meeting on 130th/145th Station Area on July 21, 2022. Each meeting had the same format and included an overview presentation and an opportunity to ask questions. The City also conducted other engagement efforts, including outreach by community-based organizations (CBOs) and two debriefs with community liaisons during the scoping period on August 11 and 16, 2022.

The input received during the scoping period included:

- Comments on One Seattle Hub—Shaping the Plan: 851 Comments with 1,439 participants
- Letters or emails: 102 pieces of correspondence
- Scoping meetings: three meetings with 82 participants
- Debriefs with five community liaisons

As part of scoping, the City identified a range of elements of the environment that should be analyzed in the EIS:

- Earth & Water Quality
- Air Quality/GHG
- Plants & Animals
- Energy & Natural Resources
- Noise
- Land Use Patterns
- Historic Resources
- Population, Employment, & Housing
- Transportation
- Public Services & Utilities

See **Appendix A** for the scoping report.

Draft EIS

~~This~~ The Draft EIS identifie~~s~~d environmental conditions, potential environmental impacts, and measures to reduce or mitigate any unavoidable adverse impacts that could result from an update to the One Seattle Comprehensive Plan.

Public and agency comments ~~are~~ were invited on the~~is~~ Draft EIS. Written and verbal comments ~~are~~ were invited during the 60-day public comment period following issuance of the~~is~~ Draft EIS. Public comments ~~will be~~ were considered and are addressed in **Chapter 4** of this~~e~~ Final EIS. Please see the Fact Sheet at the beginning of this ~~Draft~~ Final EIS for the dates of the public comment period and public meeting. Meetings and comment periods regarding the proposals are described on the City's project webpage: www.seattle.gov/opcd/one-seattle-plan.

Final EIS & Mayor's Proposed Plan

~~A~~This Final EIS ~~will be~~is issued in January 2025~~2024~~ and ~~will~~ include~~s~~ responses to public comments received during the Draft EIS comment period. Following the EIS process, we anticipate that the City will adopt the Plan and changes to zoning and development standards.

It is also likely that the Mayor or Council will generate other documents suggesting additional strategies for implementing the vision in the Comprehensive Plan. These documents could include resolutions that would be adopted by Council.

2.4 Proposed Action & Alternatives

The proposal would update the One Seattle Comprehensive Plan to address growth between 2019 and 2044 and adopt new policies and codes that help meet the objectives defined in **Section 2.1.3.** It would also implement text and map amendments to the Comprehensive Plan and changes to zoning and development standards in the Seattle Municipal Code and the Building Code.

One Seattle Comprehensive Plan

Changes to the Comprehensive Plan would help meet the objectives defined in **Section 2.1.3** and would influence the manner and distribution of projected growth and the manner in which the City conducts its operations to promote and achieve other goals such as those related to equity, economic opportunity, environmental sustainability, community, public health, safety, welfare, and service delivery. All Comprehensive Plan elements will be reviewed and updated as part of the proposal. In many cases, proposed policy amendments will reflect changes to state and regional guidance, incorporate language and editorial changes to policies to increase readability, clarify direction and remove redundancies; and add new or updated information since adoption of the current Comprehensive Plan.

Changes to the Comprehensive Plan could include but are not limited to:

- Implementing a major update of the Growth Strategy and Future Land Use Map including:
  - Adding neighborhood centers and corridors as new place types.
  - Combining the multifamily and mixed-use/commercial designations on the Comprehensive Plan's Future Land Use Map categories.
- Updating Citywide and Regional Growth Targets to reflect updated regional targets, market conditions, development capacity, and changes to the growth strategy.
- Eliminating Growth Targets for urban villages or modifying them to reflect changing market conditions, development capacity, and changes to the growth strategy.
- Identifying strategies for addressing displacement.
- Identifying strategies for meeting jurisdictional affordable housing targets.
- Identifying strategies for meeting additional infrastructure needs.
- Identifying strategies for meeting vehicle miles traveled (VMT), mode shift, and greenhouse gas emission goals.
- Updating the Parks levels-of-service (LOS) to reflect updated park goals and acquisition approaches.
- Updating the Transportation levels-of-service (LOS) to reflect updated goals, changing conditions, and address concurrency.
- Removing volume 2 of the Comp Plan which contains goals and policies excerpted from past neighborhood plans.

- Adding or modifying policies for growth strategy place types and zone categories.
- Modifying or implementing new policy changes on a wide variety of topics such as equity, complete communities, increasing housing choices, climate change resilience, greenhouse gas reduction strategies, vision zero, zero waste, electrification, decarbonization, essential public facilities, environmentally critical areas, etc.

Code Changes

Changes to the Seattle Municipal Code would implement the Growth Strategy in the Comprehensive Plan as well as specific goals and policies, particularly those around land use regulations and housing. Changes to zoning and development standards would support City goals such as allowing more people to walk or bike to everyday needs, encouraging better building design, or reducing the cost of housing. These changes could include but are not limited to:

- Modifying heights, floor area ratios, lot size, density limits, coverage limits, setbacks, amenity standards, building separations, structure depth, structure width, and other similar standards affecting the scale and form of new construction to implement goals and policies in the update Comprehensive Plan including those around increasing the supply, diversity, and affordability of housing.
- Creating a new Midrise zone.
- Adding or modifying design standards.
- Allowing more flexibility for commercial uses in certain areas such as allowing more retail on arterial streets, increasing flexibility for home businesses, and allowing ~~corner~~ small-scale commercial uses~~stores~~ in Urban Neighborhood Residential and Lowrise zones.
- Allowing more height and/or floor area for projects that provide public open space or that include affordable housing or housing types such as 3- and 4-story stacked flats or projects with shared open space.
- Updating rezone criteria.
- Reducing or eliminating residential parking minimums citywide.
- Modifying bike parking requirements to recognize the unique conditions across different zones and housing types.
- Modifying solid waste storage requirements to recognize current solid waste needs and to recognize the unique conditions across different zones and housing types.
- Modifying tree and landscaping requirements to increase tree canopy in Neighborhood Residential zones.
- Modifying ~~building code~~ regulations to support development of attached and stacked flat units.
- Implementing or modifying Mandatory Housing Affordability (MHA) requirements.
- ~~Updating tenant relocation assistance requirements to increase support for relocated households.~~

- ~~Updating our transportation concurrency requirements to reflect changes to the level-of-service standard.~~
- Changes to support electric vehicle charging when parking is provided.

Changes to the Comprehensive Plan and Seattle Municipal Code could also implement changes required by state legislation including HB 1110, which requires cities to allow a minimum number of housing units on certain lots and restricts design review and development standards for middle housing, and SB 5412, which updates SEPA categorical exemptions and requires certain environmental analysis, along with other state statutes adopted in the past several years. See **Appendix C** for a list of codes acting as mitigation which can address SB 5412 provisions as well as allowances for raising SEPA thresholds per WAC 197-11-800(1)(c).

See **Appendix J** for proposed legislation, including charts illustrating NR, LR, and MR zone standards.

Place Types & Growth

Alternatives addressed in this EIS are summarized on the following pages. The alternatives primarily distribute growth according to place types like regional centers, urban centers, neighborhood centers, etc. (see sidebar on **page 2-2** and **Exhibit 2.1-1**). Some place types align closely with existing elements of the Alternative 1, No Action, urban village strategy developed with the Seattle 2035 Comprehensive Plan, while others are new concepts created for this update. The alternatives vary the amount and type of housing across place types. **Exhibit 2.4-1** is an overview of common housing types referenced in the place types and alternatives.

Exhibit 2.4-1. Housing Types

Detached homes are in their own structure that do not share walls with any other homes.

Detached Homes on a Small Lot
Existing home preserved with two new homes added behind (left), three homes on one lot (middle), and eight homes on two lots (right).

Detached Accessory Dwelling Unit (DADU)
A second unit added to a residential lot, usually behind the main house.

Cottage Housing
Detached homes of 2-3 stories arranged around a shared open space.

Attached houses share walls with other homes, where each unit is owned outright.

Courtyard Housing
Attached homes of 2-3 stories arranged around a shared open space.

Duplex & Triplex (side-by-side)
Two or three units that share walls with one another.

Townhouse & Rowhouse
Homes that share a wall with another home that can all be owned outright.

Stacked housing includes multiple units arranged vertically.

Foursquare
A traditional form with two units per floor in a structure that often resembles a large house.

Sixplex
A three-story structure with two homes per floor.

8-plex
A four-story structure with two homes per floor.

Apartments & Condos of 5-8 Stories
Midrise buildings with multiple homes per floor that can be rented as apartments or owned as condominium units.

Highrise Apartments & Condos
Buildings above 12 stories with multiple homes per floor that can be rented as apartments or owned as condominium units.

Source: City of Seattle, 2022.

E Mercer Street and 19th Avenue E. Source: City of Seattle, 2023.

The most common housing types in the defined places are shown in **Exhibit 2.4-2** below.

Exhibit 2.4-2. Most Common Housing Types Expected in Future Development by Place Type

	Urban Neighborhood	Corridors	Neighborhood Centers	Urban Centers	Regional Centers
Detached home	X	X			
Duplex, triplex, and fourplex	X	X	X		
Townhouse and rowhouse	X	X	X	X	
Sixplex/3-story stacked flats	X	X	X	X	
4- to 5-story building		X	X	X	X
6- to 7-story buildings			X	X	X
8- to 12-story buildings				X	X
Highrise buildings (above 12 stories)					X

Note: See **Exhibit 2.1-1** for a crosswalk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~A~~lternatives ~~2-5~~.
Source: City of Seattle, 2022.

2.4.1 Alternative 1: No Action

Growth Strategy

Alternative 1 No Action, assumes the continuation of the Seattle 2035 Comprehensive Plan. Even without making any changes to the City's zoning, the existing Comprehensive Plan and implementing regulations would add 80,000 new homes and 158,000 jobs over the next 20 years, based on growth targets adopted by the King County Growth Management Council.[8] These homes and jobs would be distributed across the city based on observed growth between 2010 and 2020 and the distribution of growth in the Seattle 2035 Comprehensive Plan. In addition, growth in each urban center and village would not exceed existing zoned capacity. While the number of people working from home has increased significantly in recent years, job locations are frequently indicated based on the office in which the company is located, rather than where the work occurs. Consequently, future growth may resemble past growth even if the portion of people working from home remains high.

Exhibit 2.4-3 summarizes the acreage, housing target, and job target of Alternative 1 by place type. Under Alternative 1, new housing will continue to be primarily rental apartments concentrated in existing mixed-use areas. Most land outside urban centers and villages will remain limited to detached houses. New jobs will continue to be located primarily in existing urban centers and villages. See **Exhibit 2.4-3** and **Exhibit 2.4-4**. Estimated growth and total housing units and jobs by center are detailed in **Appendix B**.

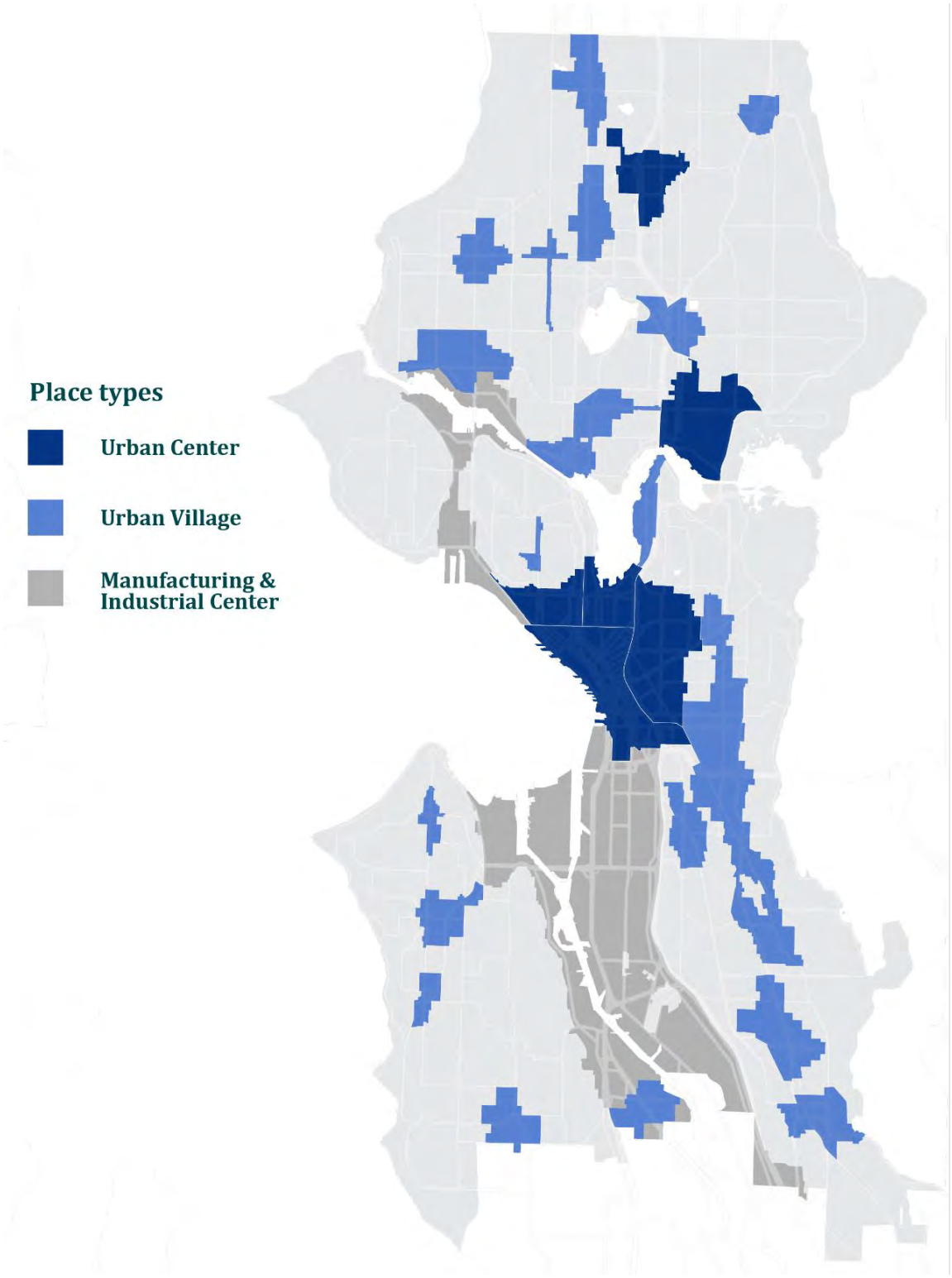
Exhibit 2.4-3. Acres and Growth by Place Type—Alternative 1: No Action

Geography*	Acres (Approx)	Housing Estimate	Job Estimate
Urban Center	3,707	36,970	102,959
Hub Urban Village	1,977	12,885	11,776
Residential Urban Village	4,447	14,764	7,735
Manufacturing Industrial	5,857	1,476	18,800
Growth Area (Maritime Industrial)	39	676	—
Outside Subareas **	37,487	13,229	16,730
No Change to Place Type in This Alternative	33,633	6,494	6,816
No Change to Place Type in ~~All~~ Alternatives 1-5	3,854	6,735	9,914
Total	**53,515**	**80,000**	**158,000**

Notes: *See **Exhibit 2.1-1** for a crosswalk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~A~~lternatives ~~2-5~~. **"Outside Subareas" includes all areas outside the other listed geographies. No change to place type is proposed in these areas under Alternatives 1-5 though growth will continue to occur throughout the 20-year planning period.
Source: City of Seattle, 2023; BERK, 2023.

[8] Growth targets were set for the years 2019-2044, but in the EIS have been adjusted to match the required 20-year planning period for 2024-2044, to account for population, housing, and employment change for the years 2019-2023.

Exhibit 2.4-4. Alternative 1: No Action*



Note: *See **Exhibit 2.1-1** for a crosswalk of existing place types (existing and Alternative 1) versus proposed place type names under the other aAlternatives 2–5.
Source: City of Seattle, 2023.

Most housing would be in Area 4 encompassing Downtown, followed by Area 1 which contains the Ballard Urban Village and Area 5 which contains the Capitol Hill Urban Center. See **Exhibit 2.4-5** and **Exhibit 2.1-2**.

Exhibit 2.4-5. Housing Growth by Location—Alternative 1: No Action

Geography*	1	2	3	4	5	6	7	8	Total
Urban Center	—	6,049	3,595	18,265	9,061	—	—	—	**36,970**
Hub Urban Village	7,588	927	—	—	—	3,128	—	1,242	**12,885**
Residential Urban Village	3,822	1,466	402	1,010	3,193	1,143	259	3,469	**14,764**
Manufacturing Industrial	—	—	628	—	—	—	848	—	**1,476**
Growth Area (Maritime Industrial)	—	—	—	—	144	—	392	140	**676**
Outside Subareas— No Change to Place Type in:	2,342	4,352	1,393	138	856	1,908	430	1,810	**13,229**
This Alternative	1,040	2,006	534	—	570	1,225	168	951	6,494
~~All~~ Alternatives 1-5	1,302	2,346	859	138	286	683	262	859	6,735
Total	**13,752**	**12,794**	**6,018**	**19,413**	**13,254**	**6,179**	**1,929**	**6,661**	**80,000**

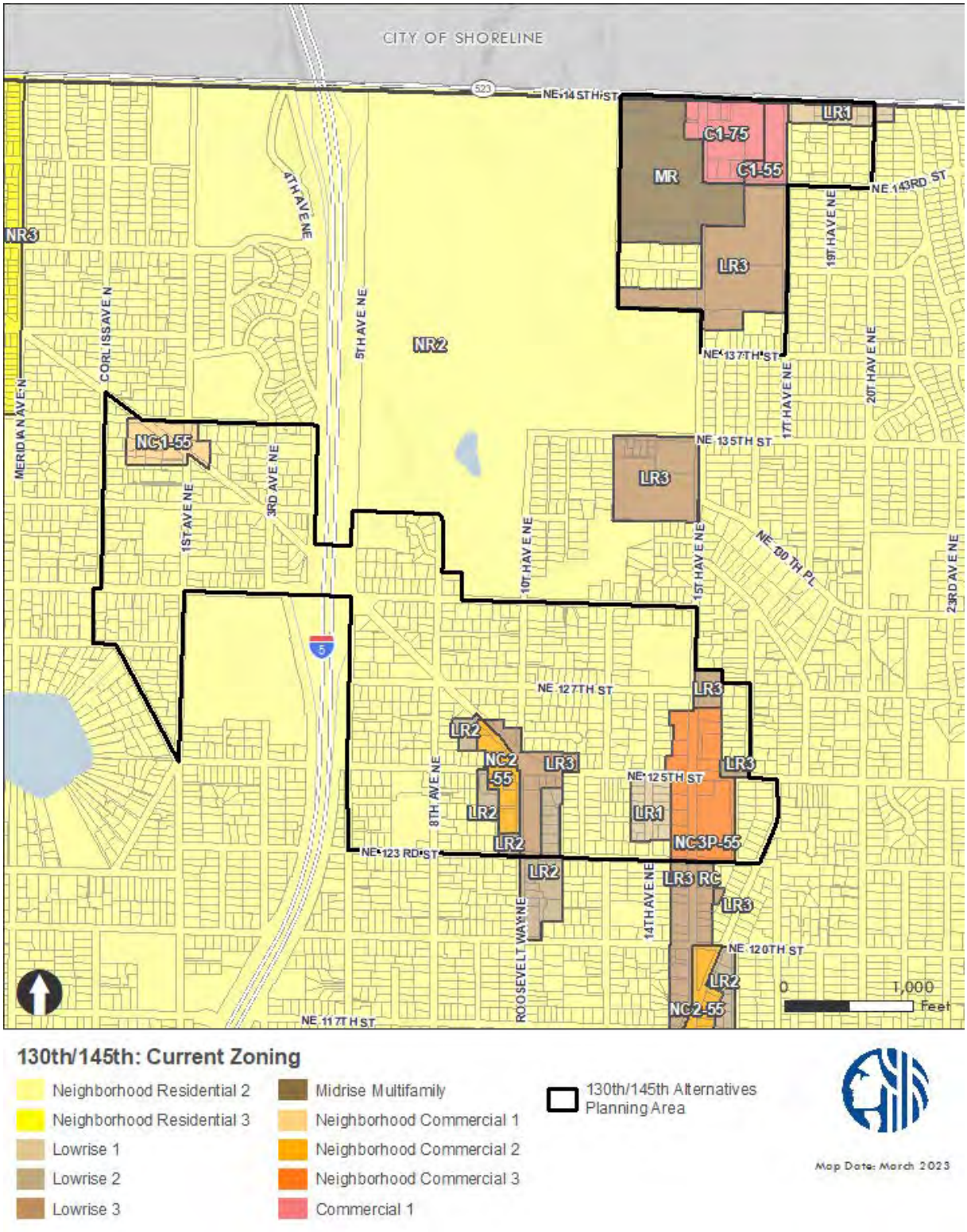
Note: *See **Exhibit 2.1-1** for a crosswalk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~A~~lternatives ~~2-5~~.
Source: City of Seattle, 2023; BERK, 2023.

130th/145th Station Area

The current Comprehensive Plan and zoning designations would be retained under Alternative 1~~,~~ No Action, in the 130th/145th Station Area. The current Neighborhood Residential zone would continue to allow three-story residential development around the future light rail station at 130th and some 4- to 8-story multifamily uses near the 145th BRT station. See **Exhibit 2.4-6**.

The key elements of growth and development in the 130th/145th Station Study Area under Alternative 1 are shown in **Exhibit 2.4-7**. Housing and job growth around both station areas would be minimal—194 housing units and 109 jobs added around 130th and 646 housing units and 607 jobs around 145th.

Exhibit 2.4-6. 130th/145th Station Area Current Zoning—Alternative 1: No Action*



Note: *See **Exhibit 2.1-1** for a crosswalk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~A~~lternatives ~~2-5~~.
Sources: City of Seattle, 2022; BERK, 2022.

Exhibit 2.4-7. 130th/145th Station Area Features—Alternative 1: No Action*

Feature	Alternative 1: No Action (aligns with citywide Alternative 1)	Assumptions
Amount and Pattern of Growth	Growth reflects the baseline amount of growth and continues the current pattern. No new areas will be designated for mixed-use or higher density.	Growth in Housing Units: 840* Growth in Jobs: 716** Activity Units (Existing and Growth): ▪ 130th Existing: 4,006, 18.4 per acre ▪ 130th Future: 4,514, 20.9 per acre ▪ 145th Existing: 2,298, 35.3 per acre ▪ 145th Future: 4,229, 64.9 per acre
Building Types for New Construction	Building types will be unchanged; larger single-family structures, accessory dwelling units, and limited multifamily and mixed-use development.	
Building Heights for New Construction	Heights will be unchanged.	Heights would range 45 to 80 feet for multifamily residential and mixed-use buildings, and 30 feet for single-family structures and accessory dwelling units.
Retail and Commercial	The location of retail and commercial uses will be unchanged.	

Notes: *See **Exhibit 2.1-1** for a crosswalk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~A~~lternatives ~~2–5~~.
** The growth estimates consider the current zoning within a common maximum boundary (Alternative 5).
Sources: City of Seattle, 2023; BERK, 2023.

2.4.2 Alternative 2: Focused

Growth Strategy

Alternative 2 would designate additional areas of focused growth called neighborhood centers to create more housing around shops and services. Neighborhood centers would be similar to urban centers (formally known as urban villages) since they would allow a wide range of housing types and commercial space, but with a smaller geographic size and lower intensity of allowed development. This alternative would result in a greater range of housing options with amenities and services in many neighborhoods. Neighborhood centers could have a range of housing from townhouses to 7 story stacked housing.

Alternative 2 studies a total housing growth of 100,000 housing units (20,000 more than the No Action Alternative) to account for the potential additional housing demand assumed within neighborhood centers. Eighty thousand new homes would be located in a similar distribution to Alternative 1, with 20,000 additional homes accommodated in new housing types within neighborhood centers. Neighborhood centers in areas with low displacement risk are allocated 50% more housing units than those in areas with high displacement risk.

Under Alternative 2, about 3,000 acres currently designated for lower-density residential would change to a neighborhood center designation, and these areas would accommodate the second highest share of anticipated housing growth. A small job shift from the larger centers would occur towards the neighborhood centers. The most housing growth would be in the Downtown/South Lake Union (Area 4) followed by Northwest and Northeast Seattle (Areas 1 and 2). See **Exhibit 2.4-8**, **Exhibit 2.4-9**, and **Exhibit 2.4-10**.

Estimated growth and total housing units and jobs by center are detailed in **Appendix B**.

Exhibit 2.4-8. Acres and Growth by Place Type—Alternative 2: Focused

Geography*	Approximate Acres	Housing Estimate	Job Estimate
Regional Center	3,707	36,970	99,870
Urban Center (former Hub Urban Village)	1,977	12,885	11,417
Urban Center (former Residential Urban Village)	4,447	14,764	7,535
Manufacturing Industrial Centers	5,857	1,476	18,800
Growth Area (Maritime Industrial)	39	676	—
Neighborhood Center	2,923	24,167	8,628
Urban Neighborhood	—	—	—
Corridor	—	—	—
Outside Subareas**	34,622	9,062	11,750
No Change to Place Type in This Alternative	30,768	2,327	2,133
No Change to Place Type in ~~All~~ Alternatives 1-5	3,854	6,735	9,617
Total	**53,573**	**100,000**	**158,000**

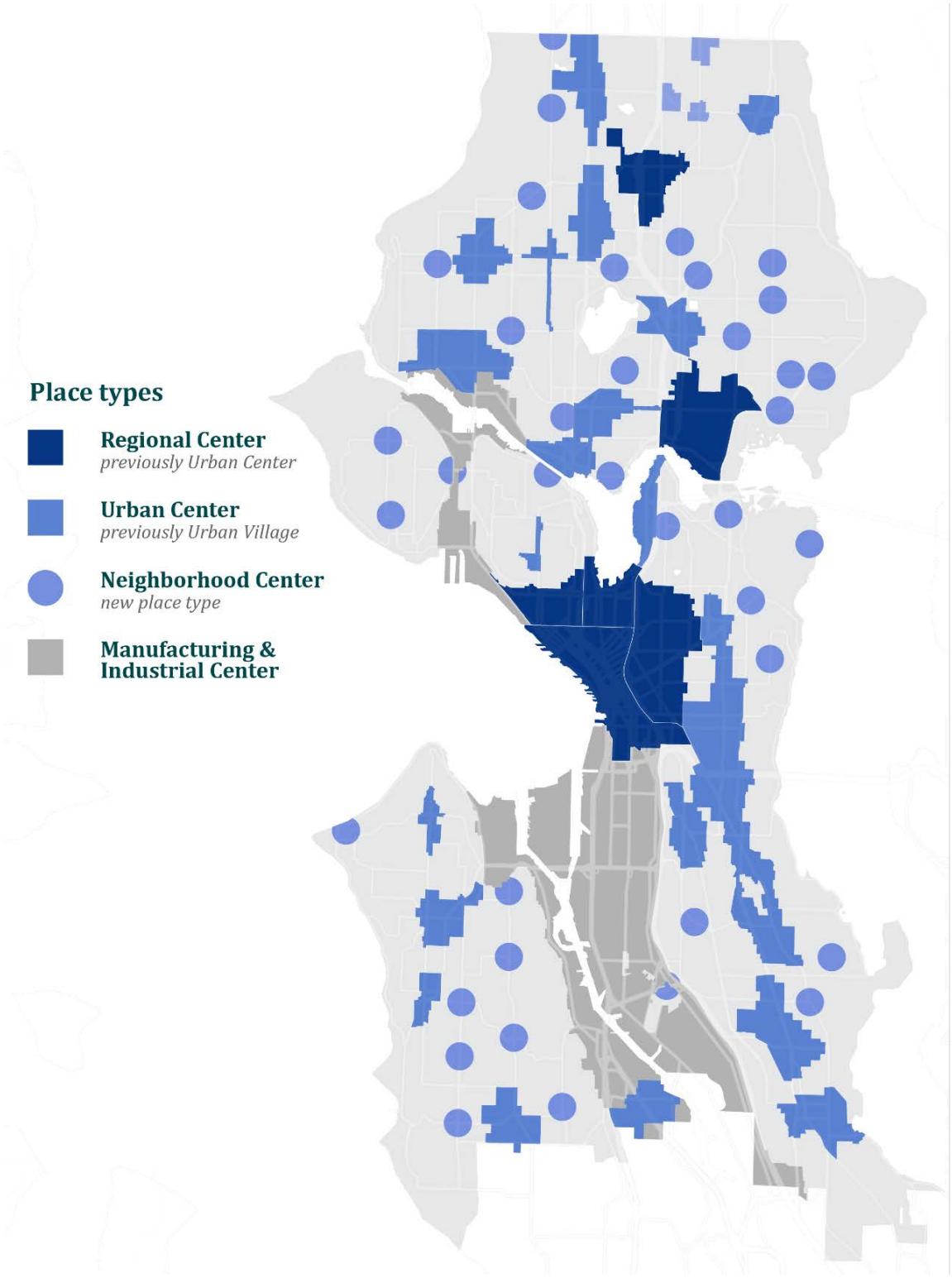
Notes: *See **Exhibit 2.1-1** for a crosswalk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~A~~lternatives ~~2-5~~.
** "Outside Subareas" includes all areas outside of one of the other listed geographies. No change to place type is proposed in these areas under Alternatives 1-5 though growth will continue to occur throughout the 20-year planning period. Alternative 2 distributes 85% of job growth in the same manner as the No Action Alternative. The other 15% is distributed based on the total housing growth in each alternative—in other words, Alternative 2 assumes a small job shift from the larger centers towards other place types to reflect local demand with the distribution of new housing.
Source: City of Seattle, 2023; BERK, 2023.

Exhibit 2.4-9. Housing Growth by Location—Alternative 2: Focused

Geography*	1	2	3	4	5	6	7	8	Total
Regional Center	—	6,049	3,595	18,265	9,061	—	—	—	36,970
Urban Center (former Hub Urban Village)	7,588	927	—	—	—	3,128	-	1,242	12,885
Urban Center (former Residential Urban Village)	3,822	1,466	402	1,010	3,193	1,143	259	3,469	14,764
Manufacturing Industrial	—	—	628	—	—	—	848	—	1,476
Growth Area (Maritime Industrial)	—	—	—	—	144	—	392	140	676
Neighborhood Center—Low Risk**	5,394	6,541	2,402	—	3,430	1,706	—	546	20,019
Neighborhood Center—High Risk**	—	453	—	—	—	2,308	506	881	4,148
Outside Subareas— No Change to Place Type in:	1,564	2,828	1,042	138	503	1,142	266	1,579	9,062
This Alternative	262	482	183	—	217	459	4	720	2,327
~~All~~ Alternatives 1-5	1,302	2,346	859	138	286	683	262	859	6,735
Total	**18,368**	**18,264**	**8,069**	**19,413**	**16,331**	**9,427**	**2,271**	**7,857**	**100,000**

Note: *See **Exhibit 2.1-1** for a crosswalk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~A~~lternatives ~~2-5~~. **Risk of displacement.
Source: City of Seattle, 2023; BERK, 2023.

Exhibit 2.4-10. Alternative 2: Focused*



Note: *See **Exhibit 2.1-1** for a crosswalk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~A~~lternatives ~~2–5~~.
Source: City of Seattle, 2023.

130th/145th Station Area

The City has created a final draft subarea plan with several purposes:

- **Create city and community concepts** around land use, transportation and other policies and investments for fast, reliable transit and compact walkable neighborhoods.
- **Align with the One Seattle Comprehensive Plan**
- **Lead with equity** to address past systemic inequities and minimize factors that contribute to displacement.
- **Address climate change** by reducing vehicle miles traveled, car dependency, and greenhouse gas (GHG) emissions.

Alternative 2 would include land use designations, zoning, and policies that would address transit-oriented development near transit investments.

Neighborhood centers would be designated in these areas: (1) near NE 130th Street and Roosevelt Way NE to the east of I-5, (2) NE 125th Street and 15th Ave NE (Pinehurst), and (3) NE 145th Street and 15th Ave NE. Zoning to implement the centers would include a combination of Lowrise Residential, Midrise Residential, and Neighborhood Commercial (NC3). The development would be more mixed use near the 145th Station Area (with NC3) compared to Alternative 1. Heights would be greater at up to seven stories, particularly along the 145th Station Area. See **Exhibit 2.4-13**.

Both stations areas would see more growth clustered in the newly designated neighborhood centers under Alternative 2 compared to the No Action Alternative. However, housing and job growth would be relatively modest—1,049 housing units and 284 jobs would be added around 130th Street and 1,159 housing units and 695 jobs would be added around NE 145th Street. See **Exhibit 2.4-11** and **Exhibit 2.4-12**. Alternative 2 would provide more housing and jobs and would increase activity units from 18.4 (existing) to 29.6 around NE 130th Street and from 35.3 (existing) to 82.4 around 15th Ave NE and NE 145th St. Activity units means the sum of population and jobs units per gross acre and is used by PSRC for evaluating combined residential and job density.

Exhibit 2.4-11. Station Area Share of Targets 2024-2044—Alternative 2: Focused

Location	Place Type*	New Place Acres**	New Housing Units**	New Jobs**	Activity Units (Existing)/Ac.	Activity Units (Future)/Ac.
NE 130th Street	Neighborhood Center	52	1,049	284	18.4	29.6
15th & 145th	Neighborhood Center	65	1,159	695	35.3	82.4

Notes: *See **Exhibit 2.1-1** for a crosswalk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~A~~lternatives ~~2-5~~.
**New place acres are the total acres within the neighborhood center boundary under Alternative 2. The growth estimates consider the proposed growth concept under Alternative 2 within a common maximum boundary (Alternative 5). The 130th Street and Pinehurst Neighborhood Centers in Alternative 2 are both part of the 130th Street Urban Center in Alternative 5 and so are listed under NE 130th Street in this table.
Source: City of Seattle, 2023; BERK, 2023.

Exhibit 2.4-12. 130th/145th Station Area Features—Alternative 2: Focused

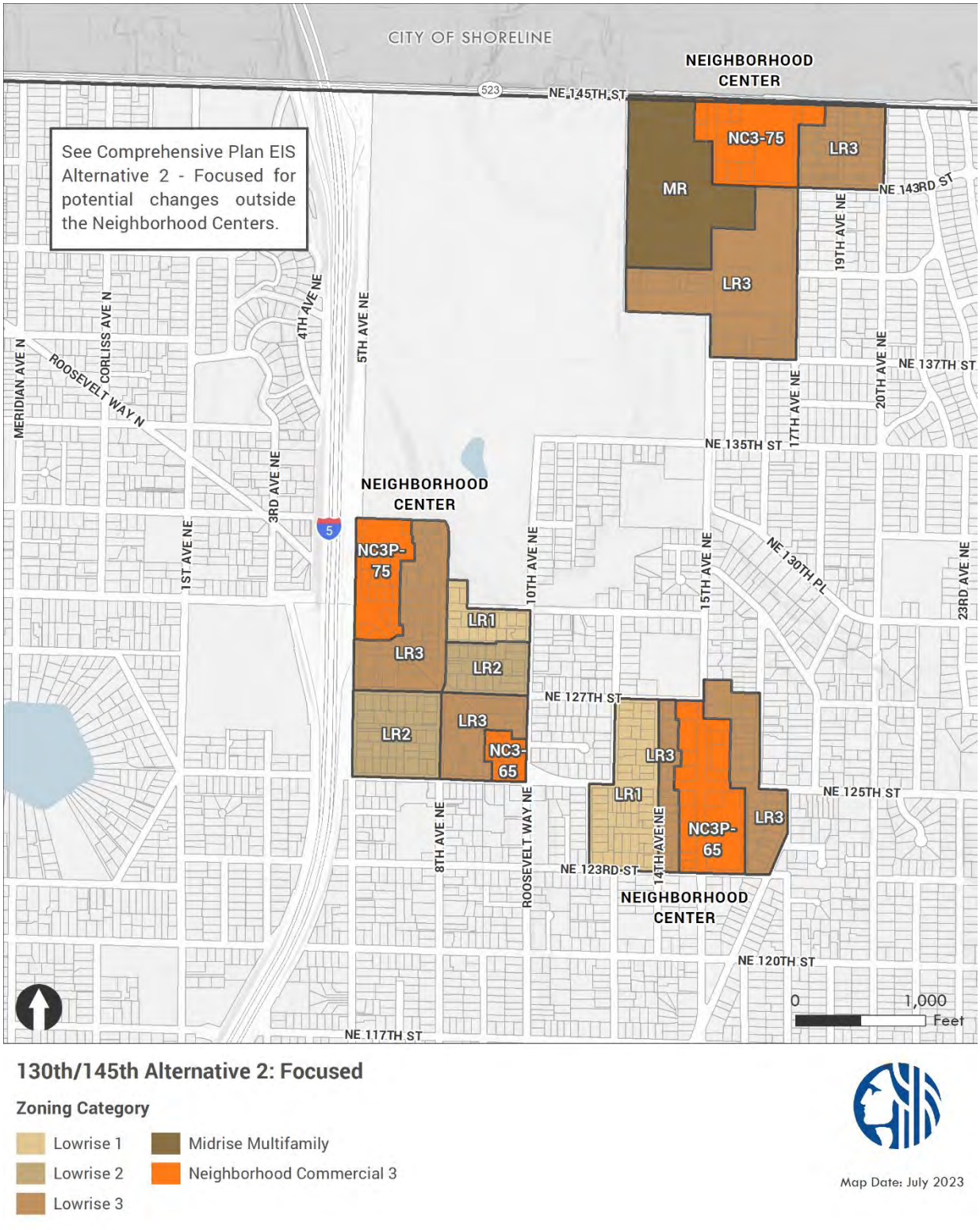
Feature	Alternative 2: Focused (aligns with citywide Alternative 2)*	Assumptions
Amount and Pattern of Growth	Cluster growth in newly designated small mixed-use node(s).	Growth in housing units: 2,208** Growth in jobs: 979** Activity units (existing and future people and jobs) and activity units per acre ▪ 130th: 6,441 units, 29.6 per acre ▪ 145th: 5,369 units, 82.4 per acre
Building Types for New Construction	Denser and taller buildings in nodes. More mixed-use buildings.	
Building Heights for New Construction		Neighborhood Centers: Potentially up to 40-80 ft
Retail and Commercial	More retail and commercial locations than Alternative 1.	

Notes: *See **Exhibit 2.1-1** for a crosswalk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~A~~lternatives ~~2-5~~.
** The growth estimates consider the proposed growth concept under Alternative 2 within a common maximum boundary (Alternative 5).
Source: City of Seattle, 2023; BERK, 2023.

In addition to establishing future land use and zoning designations supporting the station area, the City's Station Area Plan provides direction on key policy issues:

- Land Use/Housing
  - Provide more density/diversity of land uses concurrent with transit.
  - Provide more housing choice.
  - Offer affordable housing options near light rail and Bus Rapid Transit (BRT).
  - Mitigate displacement of current residents and businesses
- Amenities/Public Realm
  - Coordinate update of street types in Streets Illustrated.
  - Establish a strong visual identity for the station areas, including architecture, landscape design, public art, public realm improvements, and neighborhood wayfinding.
  - Provide amenities to support anticipated growth.
  - Retain tree canopy and healthy open spaces/environment.
- Access
  - Provide non-motorized access to the stations (safe etc.).
  - Coordinate with WSDOT, Sound Transit, and City of Shoreline.
  - Address parking regulations.

Exhibit 2.4-13. 130th/145th Station Area Zoning Concept—Alternative 2: Focused*



Notes: See **Exhibit 2.1-1** for a crosswalk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~A~~lternatives ~~2-5~~.
Source: City of Seattle, 2022; BERK, 2022.

2.4.3 Alternative 3: Broad

Growth Strategy

This alternative allows a wider range of low-scale housing options, like triplexes and fourplexes, in all Neighborhood Residential (NR) zones as part of a new urban neighborhood place type. This approach would:

- Expand housing choices in all neighborhoods.
- Increase production of homeownership options.
- Address exclusionary nature of current zoning.
- Allow more housing options near existing large parks and other neighborhood amenities.

Housing in the urban neighborhood place type could include duplexes, triplexes, and fourplexes, as well as stacked flats and sixplexes on larger lots. Market-rate development in these areas would continue to have a three-story height limit, consistent with current rules in Neighborhood Residential zones. The City is also considering potential height, floor area, or density bonuses for affordable housing projects.

Alternative 3 studies a total housing growth of 100,000 housing units (20,000 more than the No Action Alternative) to account for the potential additional housing demand that is expected with broad zoning changes. Eighty thousand units would be located in a similar distribution to Alternative 1, with 20,000 additional homes accommodated within urban neighborhood areas.

Alternative 3 studies the same number of jobs as the No Action Alternative but includes a small shift in the distribution of jobs and commercial space toward existing urban neighborhood areas to reflect local demand consistent the distribution of new housing. The City is also considering allowing more flexibility for commercial space in urban neighborhood areas such as allowing corner stores and making it easier to operate at-home businesses. This flexibility supports the development of neighborhoods where more people can walk and bike to everyday needs.

Citywide, most land would remain designated as urban neighborhood, though most housing growth potential would still be in regional centers and urban centers. Most new jobs would occur in the regional centers and the manufacturing industrial centers. See **Exhibit 2.4-14**, **Exhibit 2.4-15**, and **Exhibit 2.4-16**.

Unlike Alternatives 1 and 2, the most growth would be in Northeast Seattle followed by the Downtown/South Lake Union study area. See **Exhibit 2.4-15**.

Estimated growth and total housing units and jobs by center are detailed in **Appendix B**.

Exhibit 2.4-14. Acres and Growth by Place Type—Alternative 3: Broad

Geography*	Approximate Acres	Housing Estimate	Job Estimate
Regional Center	3,707	36,970	99,870
Urban Center (former Hub Urban Village)	1,977	12,885	11,417
Urban Center (former Residential Urban Village)	4,447	14,764	7,535
Manufacturing Industrial Centers	5,857	1,476	18,800
Growth Area (Maritime Industrial)	39	676	—
Neighborhood Center	—	—	—
Urban Neighborhood	32,581	22,423	5,906
Corridor	—	—	—
Outside Subareas**	4,907	10,806	14,472
No Change to Place Type in This Alternative	1,052	4,071	4,855
No Change to Place Type in ~~All~~ Alternatives 1-5	3,854	6,735	9,617
Total	**53,515**	**100,000**	**158,000**

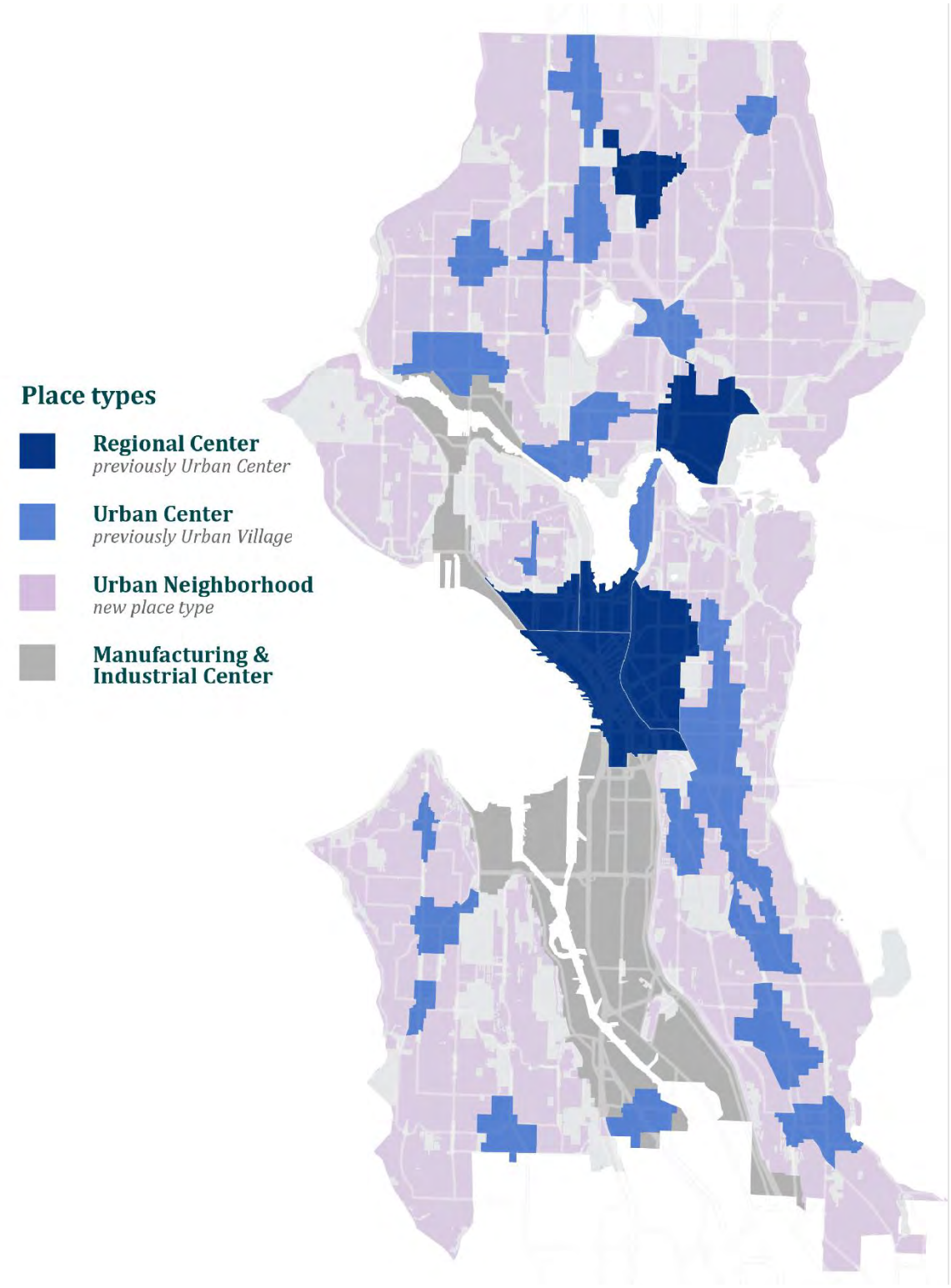
Note: *See **Exhibit 2.1-1** for a crosswalk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~A~~lternatives ~~2-5~~.
**"Outside Subareas" includes all areas outside the other listed geographies. No change to place type is proposed in these areas under Alternatives 1-5 though growth will continue to occur throughout the 20-year planning period. Alternative 3 distributes 85% of job growth in the same manner as the No Action Alternative. The other 15% is distributed based on the total housing growth in each alternative—in other words, Alternative 3 assumes a small job shift from the larger centers towards other place types to reflect local demand with the distribution of new housing.
Source: City of Seattle, 2023; BERK, 2023.

Exhibit 2.4-15. Housing Growth by Location—Alternative 3: Broad

Geography*	1	2	3	4	5	6	7	8	Total
Regional Center	—	6,049	3,595	18,265	9,061	—	—	—	**36,970**
Urban Center (former Hub Urban Village)	7,588	927	—	—	—	3,128	—	1,242	**12,885**
Urban Center (former Residential Urban Village)	3,822	1,466	402	1,010	3,193	1,143	259	3,469	**14,764**
Manufacturing Industrial	—	—	628	—	—	—	848	—	**1,476**
Growth Area (Maritime Industrial)	—	—	—	—	144	—	392	140	**676**
Urban Neighborhood	4,095	7,921	875	—	741	4,480	21	4,290	**22,423**
Outside Subareas— No Change to Place Type in:	2,062	3,843	1,214	138	620	1,426	427	1,076	**10,806**
This Alternative	760	1,497	355	—	334	743	165	217	4,071
~~All~~ Alternatives 1-5	1,302	2,346	859	138	286	683	262	859	6,735
Total	**17,567**	**20,206**	**6,714**	**19,413**	**13,759**	**10,177**	**1,947**	**10,217**	**100,000**

Note: * See **Exhibit 2.1-1** for a crosswalk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~A~~lternatives ~~2-5~~.
Source: City of Seattle, 2023; BERK, 2023.

Exhibit 2.4-16. Alternative 3: Broad*



Note: *See **Exhibit 2.1-1** for a crosswalk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~A~~lternatives ~~2–5~~. Place type names were corrected in the legend for the Final EIS to reflect the proposed place type names.
Source: City of Seattle, 2023.

130th/145th Station Area

Under this alternative, no changes would occur to the future land use map in the 130th/145th station area, but urban neighborhood areas would have more flexibility for middle housing, corner stores, and at-home businesses.

2.4.4 Alternative 4: Corridor

Growth Strategy

This alternative would allow a wider range of housing options only in corridors to focus growth within a short walk of transit and amenities. This alternative would increase production of both homeownership and rental options in various neighborhoods and support City and regional investment in transit. Corridors could have a range of housing options from duplexes to 5-story stacked housing or higher heights in existing multifamily/commercial areas.

Alternative 4 studies a total housing growth of 100,000 housing units (20,000 more than the No Action Alternative) to account for the potential additional housing demand that is expected within the corridors. Eighty thousand units would be located in a similar distribution to Alternative 1, with 20,000 additional homes accommodated within corridors. Alternative 4 would have the same number of jobs as the No Action Alternative but includes a small shift in the distribution of jobs and commercial space toward corridors, consistent with the distribution of new housing.

Corridor areas would be the largest single place type and would accommodate the second highest housing growth after regional centers. Most jobs would be generated in the regional centers and the manufacturing industrial centers. See **Exhibit 2.4-17**, **Exhibit 2.4-18**, and **Exhibit 2.4-19**.

The most housing is proposed in Northeast Seattle followed by the Downtown/South Lake Union study area (similar to Alternative 3 but in a format that densifies corridors). See **Exhibit 2.4-18**.

Estimated growth and total housing units and jobs by center are detailed in **Appendix B**.

Exhibit 2.4-17. Acres and Growth by Place Type—Alternative 4: Corridor

Geography*	Approximate Acres	Housing Estimate	Job Estimate
Regional Center	3,707	36,970	99,870
Urban Center (former Hub Urban Village)	1,977	12,885	11,417
Urban Center (former Residential Urban Village)	4,447	14,764	7,535
Manufacturing Industrial	5,857	1,476	18,800
Growth Area (Maritime Industrial)	39	676	—
Neighborhood Center	—	—	—
Urban Neighborhood	—	—	—
Corridor	20,420	21,207	3,910
Outside Subareas**	17,067	12,022	16,468
No Change to Place Type in This Alternative	13,213	5,287	6,851
No Change to Place Type in ~~All~~ Alternatives 1-5	3,854	6,735	9,617
Total	**53,514**	**100,000**	**158,000**

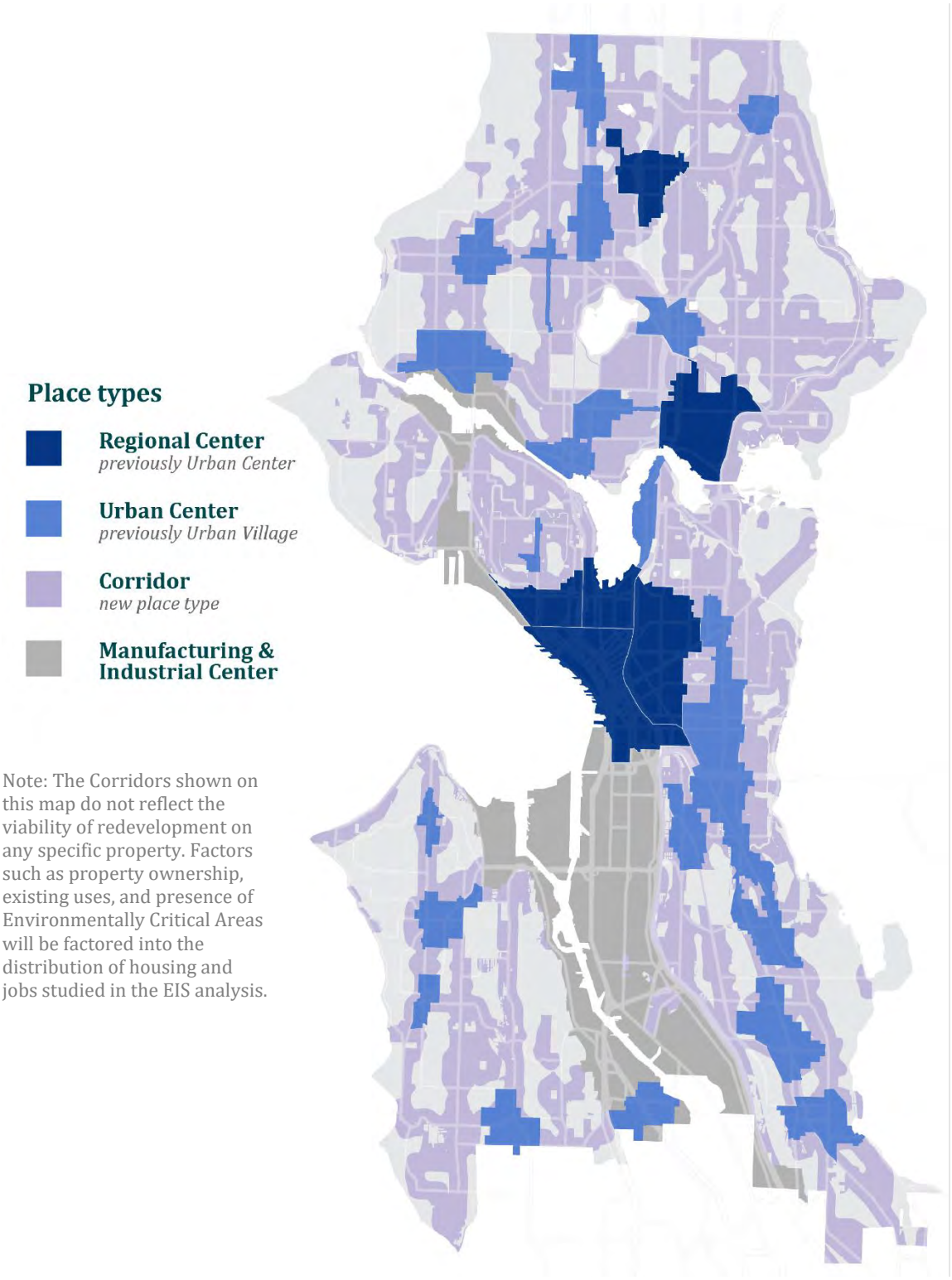
Note: *See **Exhibit 2.1-1** for a crosswalk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~A~~lternatives ~~2-5~~.
**"Outside Subareas" includes all areas outside the other listed geographies. No change to place type is proposed in these areas under Alternatives 1-5 though growth will continue to occur throughout the 20-year planning period. Alternative 4 distribute 85% of job growth in the same manner as the No Action Alternative. The other 15% is distributed based on the total housing growth in each alternative—in other words, Alternative 4 assumes a small job shift from the larger centers towards other place types to reflect local demand with the distribution of new housing.
Source: City of Seattle, 2023; BERK, 2023.

Exhibit 2.4-18. Housing Growth by Location—Alternative 4: Corridor

Geography*	1	2	3	4	5	6	7	8	Total
Regional Center	—	6,049	3,595	18,265	9,061	—	—	—	**36,970**
Urban Center (former Hub Urban Village)	7,588	927	—	—	—	3,128	—	1,242	**12,885**
Urban Center (former Residential Urban Village)	3,822	1,466	402	1,010	3,193	1,143	259	3,469	**14,764**
Manufacturing Industrial	—	—	628	—	—	—	848	—	**1,476**
Growth Area (Maritime Industrial)	—	—	—	—	144	—	392	140	**676**
Corridor	3,579	8,484	694	—	719	4,114	33	3,584	**21,207**
Outside Subareas— No Change to Place Type in:	2,212	4,115	1,319	138	690	1,676	426	1,446	**12,022**
This Alternative	910	1,769	460	—	404	993	164	587	5,287
~~All~~ Alternatives 1-5	1,302	2,346	859	138	286	683	262	859	6,735
Total	**17,201**	**21,041**	**6,638**	**19,413**	**13,807**	**10,061**	**1,958**	**9,881**	**100,000**

Note: *See **Exhibit 2.1-1** for a crosswalk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~A~~lternatives ~~2-5~~.
Source: City of Seattle, 2023; BERK, 2023.

Exhibit 2.4-19. Alternative 4: Corridor*



Note: The Corridors shown on this map do not reflect the viability of redevelopment on any specific property. Factors such as property ownership, existing uses, and presence of Environmentally Critical Areas will be factored into the distribution of housing and jobs studied in the EIS analysis.

Note: *See **Exhibit 2.1-1** for a crosswalk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~A~~lternatives ~~2–5~~.
Source: City of Seattle, 2023.

130th/145th Station Area

Within the station areas, a wider range of housing options would be allowed only in corridors consistent with the citywide approach.

2.4.5 Alternative 5: Combined

Growth Strategy

Alternative 5 anticipates the largest increase in supply and diversity of housing across Seattle. It includes the strategies for encouraging housing growth in Alternatives 2, 3, and 4 plus additional changes to existing urban center and village boundaries and changes to place type designations. This alternative seeks to:

- Accommodate abundant housing in neighborhoods across the city.
- Promote a greater range of rental and ownership housing.
- Address past underproduction of housing and rising housing costs.

Alternative 5 assumes growth of 120,000 housing units (40,000 more than the No Action Alternative) to account for the potential additional housing growth that could occur under a combination of changes identified in Alternatives 2, 3, and 4 plus designating Ballard as a regional center, expanding boundaries of seven existing urban centers (formerly called urban villages), and designating the 130th Station Area as an urban center. Eighty thousand units would be located in a similar distribution to Alternative 1, with the additional 40,000 homes distributed based on a combination of Alternatives 2, 3, and 4. The distribution of jobs and housing would be a combination of the other alternatives after accounting for expanded urban village boundaries and potential changes to place type designations. See **Exhibit 2.4-20**, **Exhibit 2.4-21**, and **Exhibit 2.4-22**.

Most housing growth would be in Northwest and Northeast Seattle (Areas 1 and 2) followed by Downtown/South Lake Union (Area 4). While most housing would continue to be in regional centers and urban centers, the combined growth in neighborhood centers and corridors would also be substantial. See **Exhibit 2.4-21**.

Estimated growth and total housing units and jobs by center are detailed in **Appendix B**.

Exhibit 2.4-20. Acres and Growth by Place Type—Alternative 5: Combined

Geography*	Approximate Acres	Housing Estimate	Job Estimate
Regional Center	3,765	43,051	101,908
Urban Center (former Hub Urban Village)	2,157	7,855	7,273
Urban Center (former Residential Urban Village)	5,606	22,862	8,878
Manufacturing Industrial	5,857	1,476	18,800
Growth Area (Maritime Industrial)	39	676	—
Neighborhood Center	2,830	19,641	7,072
Urban Neighborhood	11,728	8,848	3,113
Corridor	17,736	8,856	1,538
Outside Subareas**	3,854	6,735	9,418
No Change to Place Type in This Alternative	—	—	—
No Change to Place Type in ~~All~~ Alternatives 1-5	3,854	6,735	9,418
Total	**53,572**	**120,000**	**158,000**

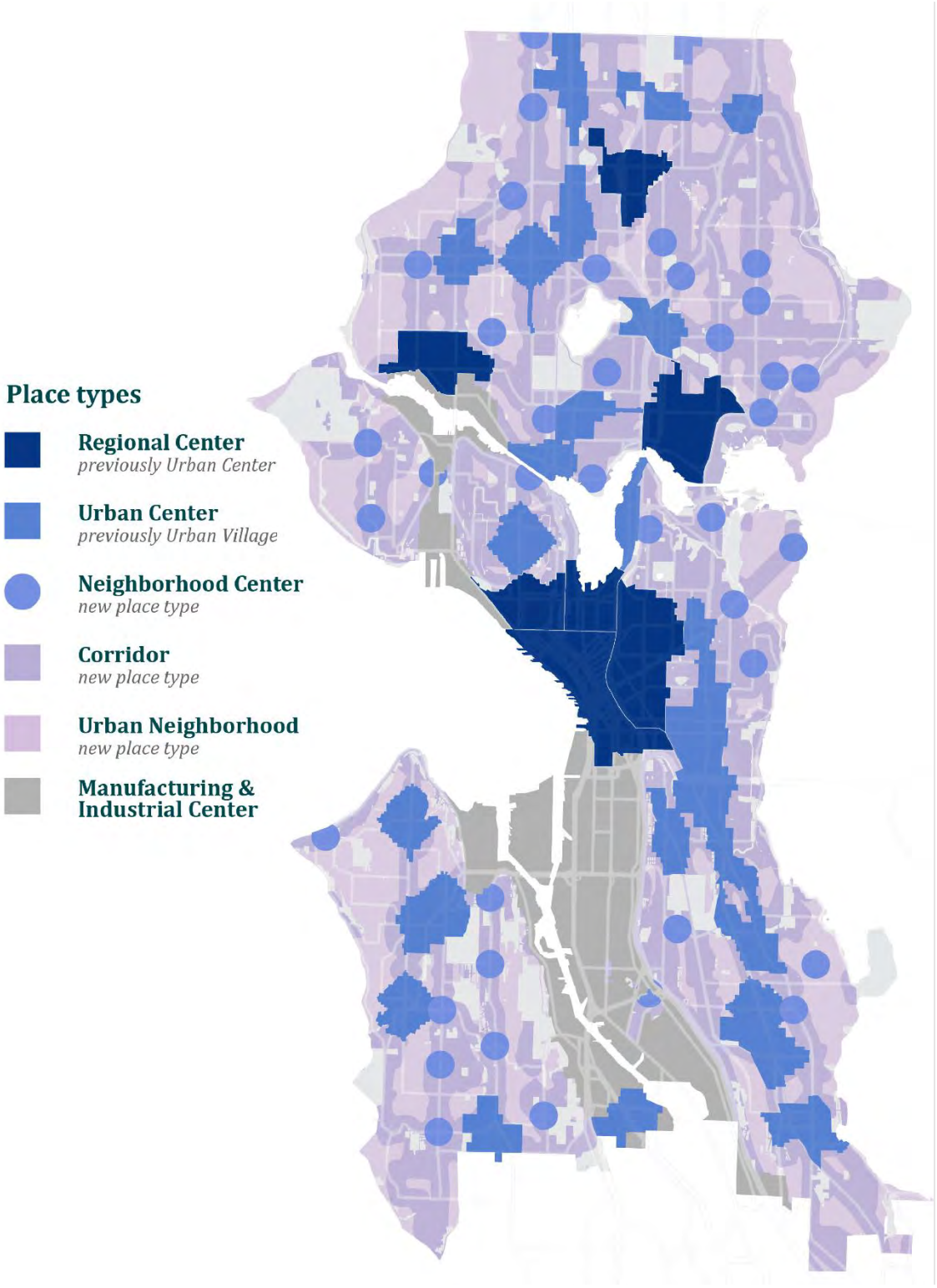
Note: *See **Exhibit 2.1-1** for a crosswalk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~A~~lternatives ~~2-5~~.
**"Outside Subareas" includes all areas outside the other listed geographies. No change to place type is proposed in these areas under Alternatives 1-5 though growth will continue to occur throughout the 20-year planning period. Alternative 5 distribute 85% of job growth in the same manner as the No Action Alternative. The other 15% is distributed based on the total housing growth in each alternative—in other words, Alternative 5 assumes a small job shift from the larger centers towards other place types to reflect local demand with the distribution of new housing.
Source: City of Seattle, 2023; BERK, 2023.

Exhibit 2.4-21. Housing Growth by Location—Alternative 5: Combined

Geography*	1	2	3	4	5	6	7	8	Total
Regional Center	6,042	6,049	3,364	18,265	9,061	—	—	—	**43,051**
Urban Center (former Hub Urban Village)	2,546	927	—	—	—	3,140	—	1,242	**7,855**
Urban Center (former Residential Urban Village)	3,838	3,110	429	1,010	3,194	2,884	1,659	6,738	**22,862**
Manufacturing Industrial Centers	—	—	628	—	—	—	848	—	**1,476**
Growth Area (Maritime Industrial)	—	—	—	—	144	—	392	140	**676**
Neighborhood Center—Low Risk**	4,494	5,127	2,002	—	2,830	1,406	—	446	**16,306**
Neighborhood Center—High Risk**	—	—	—	—	—	2,083	461	791	**3,335**
Urban Neighborhood	1,885	2,569	310	—	240	1,878	—	1,966	**8,848**
Corridor	1,390	3,429	305	—	346	1,674	14	1,698	**8,856**
Outside Subareas— No Change to Place Type in:	1,302	2,346	859	138	286	683	262	859	**6,735**
This Alternative	—	—	—	—	—	—	—	—	—
~~All~~ Alternatives 1-5	1,302	2,346	859	138	286	683	262	859	6,735
Total	**21,498**	**23,558**	**8,164**	**19,413**	**16,100**	**13,748**	**3,637**	**13,881**	**120,000**

Notes: *See **Exhibit 2.1-1** for a crosswalk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~A~~lternatives ~~2-5~~.
**Risk of displacement.
Source: City of Seattle, 2023; BERK, 2023.

Exhibit 2.4-22. Alternative 5: Combined*



Note: *See **Exhibit 2.1-1** for a crosswalk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~A~~lternatives ~~2–5~~. Place type names were corrected in the legend for the Final EIS to reflect the proposed place type names.
Source: City of Seattle, 2023.

Source: City of Seattle 130th and 145th Station Area Planning Multimodal Mobility Study, December 2020.

130th/145th Station Area

Under Alternative 5, an urban center would be created straddling the west and east sides of I-5 at the Sound Transit light rail station, with zoning including Lowrise Residential, Midrise Multifamily, and Neighborhood Commercial (NC2 and NC3). This would merge an existing commercial node around Pinehurst with an expanded residential mixed-use area closer to the station. See **Exhibit 2.4-25**.

Housing and job growth in the 130th Station Area would be greatest under Alternative 5, with more growth clustered in the newly designated urban center—1,644 additional housing units and 356 additional jobs would be added around 130th Street and 1,059 housing units and 648 jobs around 145th Street. Growth in the 145th Station Area would be similar to Alternative 2 in the newly designated neighborhood center. Growth would increase activity units from 18.4 (existing) to 35.5 around NE 130th Street and from 35.3 (existing) to 78.5 around 15th and 145th. See **Exhibit 2.4-23** and **Exhibit 2.4-24**.

Exhibit 2.4-23. Station Area Share of Targets, 2024-2044—Alternative 5: More and Distributed Growth

Location	Place Type*	Acres	New Housing Units	New Jobs	Activity Units (Existing)/Ac.	Activity Units (Future)/Ac.
NE 130th Street	Urban Center	218	1,644	356	18.4	35.5
15th & 145th	Neighborhood Center—Low Risk**	65	1,059	648	35.3	78.5

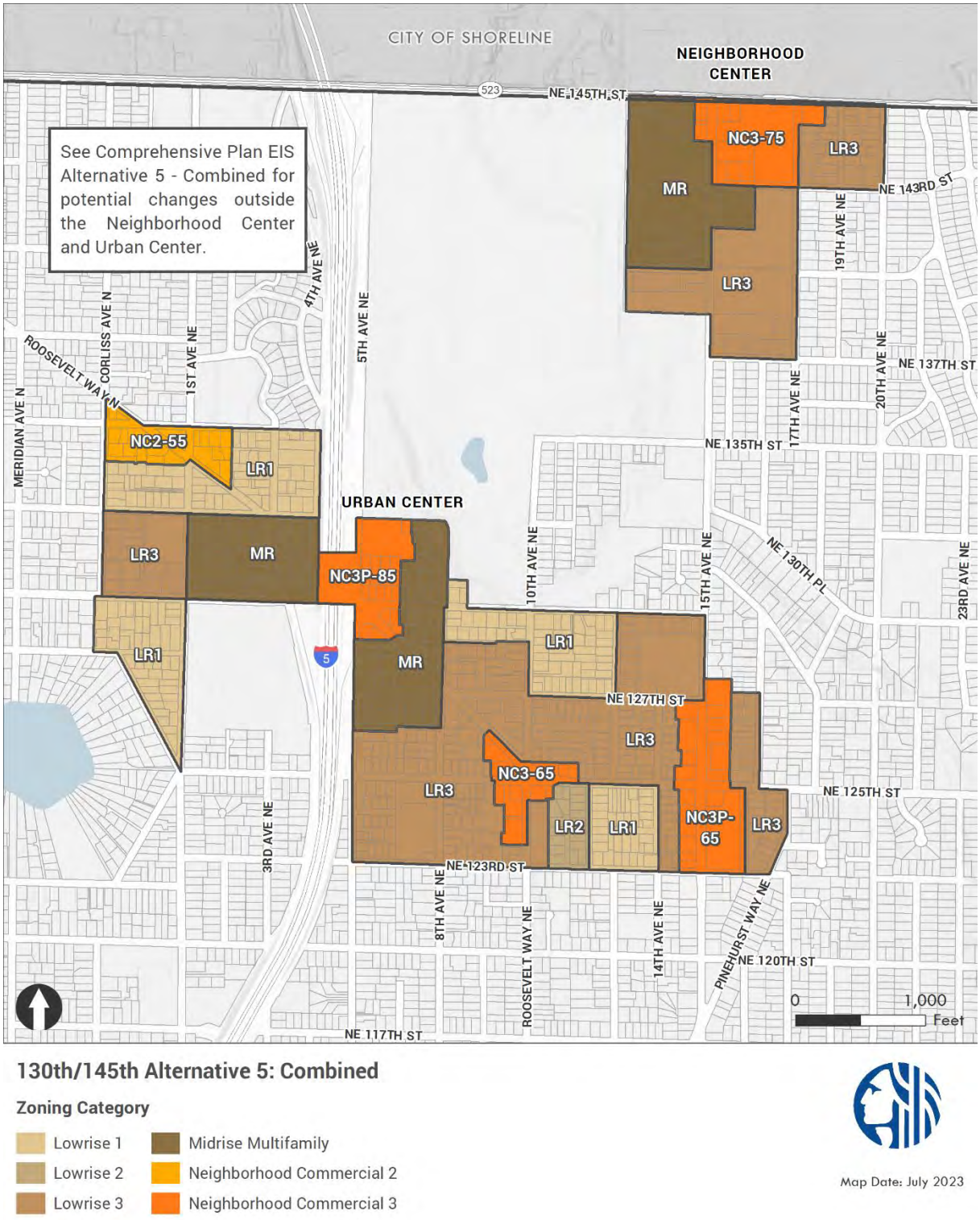
Notes: *See **Exhibit 2.1-1** for a crosswalk of existing place types (existing and Alternative 1) versus proposed place type names under Alternatives 25. The 130th Street and Pinehurst Neighborhood Centers from Alternative 2 are both part of the 130th Street Urban Center in Alternative 5.
**Risk of displacement.
Source: City of Seattle, 2023; BERK, 2023.

Exhibit 2.4-24. 130th/145th Station Area Features—Alternative 5: More and Distributed Growth

Features	Alternative 5: More & Distributed Growth (aligns with citywide Alternative 5: Combined)*	Assumptions
Amount and Pattern of Growth	Potential new urban center and neighborhood center designations. Residential areas growth.	Growth in housing units: 2,703 Growth in jobs: 1,004 Activity units (people and jobs): ▪ 130th: 7,733, 35.5 per acre ▪ 145th: 5,117, 78.5 per acre
Building Types for New Construction	Denser than Alt 2 with more mixed-use buildings and more home type variety.	
Building Heights for New Construction	Greater than Alts 1 and 2.	Urban Center: 95 ft ~~Corridors~~Neighborhood Center: 40-80 feet Urban Neighborhood: 30 feet
Retail and Commercial	More retail and commercial locations	

Note: *See **Exhibit 2.1-1** for a crosswalk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~A~~lternatives ~~2-5~~.
Sources: City of Seattle; 2023; BERK, 2023.

Exhibit 2.4-25. 130th/145th Station Area Zoning Concepts—Alternative 5: Combined*



Notes: *See **Exhibit 2.1-1** for a crosswalk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~A~~lternatives ~~2-5~~.
Sources: City of Seattle, 2022; BERK, 2022.

2.4.6 Preferred Alternative

Note: This Preferred Alternative section was added since the Draft EIS.

Growth Strategy

The Preferred Alternative includes the Mayor's Recommended Growth Strategy reflected in the proposed One Seattle Comprehensive Plan and the One Seattle Zoning Update. These plans and implementing zoning consider the public comment during the Draft EIS and Draft Plan comment periods and public engagement opportunities. Studied growth, like Alternative 5, totals at 120,000 new dwellings (40,000 more than Alternative 1) and the same jobs of 158,000 jobs for the period 2024-2044. See **Exhibit 2.4-26**, **Exhibit 2.4-27**, and **Exhibit 2.4-28**.

The Preferred Alternative place types described in **Section 2.1** are implemented by One Seattle Zoning. The Preferred Alternative incorporates ideas developed in Alternatives 1–5. Notable features of this alternative include:

- Regional Centers (7) and Urban Centers (25)
  - Similar to Alternative 5, Ballard would become a regional center
  - Similar to Alternative 5, a new urban center is located at NE 130th Street Light Rail Station
  - Expansions are located at new light rail stations, in Squire Park, and in small centers. This includes expansion of the First Hill/Capitol Hill Regional Center and 23rd & Union–Jackson Urban Center.
- Neighborhood Centers (30)
  - Similar to Alternatives 2 and 5 there are 30 new neighborhood centers. This includes 5 that are expanded or shifted in comparison to Alternatives 2 and 5:
    - North Magnolia (was mostly neighborhood center and urban neighborhood under Alternative 5)
    - High Point (was mostly neighborhood center under Alternative 5)
    - Mid Beacon Hill (was mostly corridor under Alternative 5)
    - Upper Fremont (was mostly neighborhood center under Alternative 5)
    - Hillman City (was mostly corridor under Alternative 5)
  - Additionally, 1 neighborhood center is changed from an urban center considered under Alternatives 1–5 to a neighborhood center (South Park)
- Urban Neighborhood: The urban neighborhood place type is implemented with updated NR zoning to fulfill middle housing requirements in HB 1110 as well as implemented with upzones along frequent transit arterials. These middle housing concepts were part of Alternatives 3, 4 and 5 in particular, and transit focused corridors were part of Alternatives 4 and 5.
  - Similar to other action alternatives, the Preferred Alternative would allow unit lot subdivision in Neighborhood Residential zones.[9]

[9] A unit lot subdivision (ULS) creates new lots in a short plat process, except a ULS allows flexible application of zoning dimensional standards. They are one method for dividing multiple housing units on a parcel into individual unit lots for sale to individual owners, providing fee simple homeownership, such as condominium units and townhomes. See: https://deptofcommerce.app.box.com/s/8i72so6zaxmlnmds3kg0dte72g6eehze.

Growth is directed and supported by new plan elements addressing land use, housing, economic development, utilities, transportation, climate change and resiliency, and more. The long-term Seattle Transportation Plan concepts are implemented during the 20-year planning period by the Transportation Element and Capital Facilities Plan. The Seattle Transportation Plan EIS (February 2024) and this EIS consider these proposals in **Section 3.10 Transportation.**

Exhibit 2.4-26. Acres and Growth by Place Type—Preferred Alternative

Geography	Approximate Acres	Housing Estimate	Job Estimate
Regional Center	4,357	43,000	101,000
Urban Center (former Hub Urban Village)	1,579	8,340	7,645
Urban Center (former Residential Urban Village)	5,081	20,680	7,635
Manufacturing Industrial	5,825	800	18,800
Neighborhood Center[1]	1,601	11,560	5,510
Urban Neighborhood[1]	33,493	23,610	11,470
Frequent Transit Corridor[1]	1,572	12,010	5,940
Total	**53,508**	**120,000**	**158,000**
Outside Subareas—No Change to Place Type in All Alternatives[1,2]	3,854	5,598	9,617

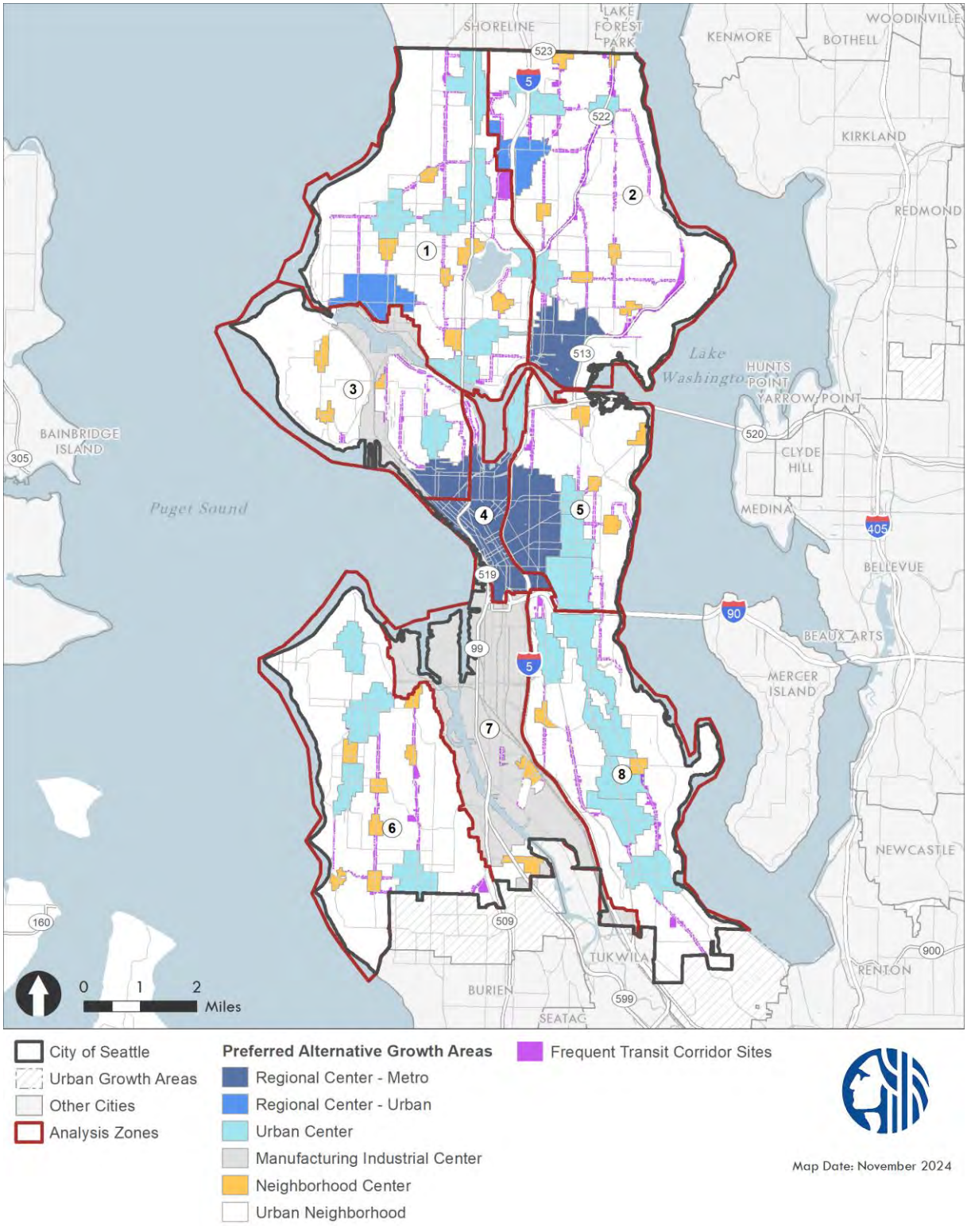
Note: See **Exhibit 2.1-1** for a crosswalk of existing place types (existing and Alternative 1) versus proposed place type names under the other alternatives. Like Alternative 5, the Preferred Alternative assumes a small job shift from the larger centers towards other place types to reflect local demand with the distribution of new housing.
1 Areas with no change to place type under Alternatives 1-5 are part of the neighborhood center, urban neighborhood, or frequent transit corridor place types under the Preferred Alternative.
2 Under the Preferred Alternative, the same 3,854 acres as Alternatives 1-5 are technically classified as new place types. The potential for and extent of development in these areas under the Preferred Alternative would be similar to Alternatives 1-5 as no substantial shift is expected from currently allowed development patterns.
Source: City of Seattle, 2024; BERK, 2024.

Exhibit 2.4-27. Housing Growth by Location—Preferred Alternative

Geography	1	2	3	4	5	6	7	8	Total
Regional Center	6,000	6,000	3,500	18,000	9,500	—	—	—	**43,000**
Urban Center (former Hub Urban Village)	2,545	925	—	—	—	3,630	—	1,240	**8,340**
Urban Center (former Residential Urban Village)	4,320	2,965	900	1,010	3,985	2,145	—	5,355	**20,680**
Manufacturing Industrial Centers	—	—	300	—	—	—	500	—	**800**
Neighborhood Center	2,960	2,550	1,260	—	1,245	2,055	710	780	**11,560**
Urban Neighborhood	7,630	6,010	2,325	10	1,780	3,835	295	1,725	**23,610**
Frequent Transit Corridor	2,215	5,065	690	105	1,130	1,100	110	1,595	**12,010**
Total	**25,670**	**23,515**	**8,975**	**19,125**	**17,640**	**12,765**	**1,615**	**10,695**	**120,000**

Notes: See **Exhibit 2.1-1** for a crosswalk of existing place types (existing and Alternative 1) versus proposed place type names under the other alternatives 2-5.
Source: City of Seattle, 2024; BERK, 2024.

Exhibit 2.4-28. Preferred Alternative Place Types



Note: No growth is assigned to public facilities under the Preferred Alternative (e.g., parks) even though they are shown as urban neighborhood on this map.
Source: City of Seattle, 2024; BERK, 2024.

The City has developed proposed legislation to implement middle housing and amend several Neighborhood Residential, Lowrise, and Midrise Zone. See **Appendix J** for more details on the proposed code revisions.

130th/145th Station Area

Under the Preferred Alternative, an urban center would be created straddling the west and east sides of I-5 at the Sound Transit light rail station at 130th with Low-rise Residential, Midrise Multifamily, and Neighborhood Commercial zoning. The 130th Station Area would see an increase in housing and job growth under the Preferred Alternative, similar to but slightly lower than Alternative 5. Similar to Alternatives 2 and 5, the 145th Station Area would be designated as a neighborhood center under the Preferred Alternative with similar zoning and housing growth and slightly fewer jobs. See **Exhibit 2.4-29**, **Exhibit 2.4-30**, and **Exhibit 2.4-31**.

Exhibit 2.4-29. Station Area Share of Targets, 2024-2044—Preferred Alternative

Location	Place Type*	Acres	New Housing Units	New Jobs	Activity Units (Existing)/Ac.**	Activity Units (Future)/Ac.**
NE 130th Street	Urban Center	217	1,500	360	17.3	33.2
15th & 145th***	Neighborhood Center	53	652	298	39.2	69.6

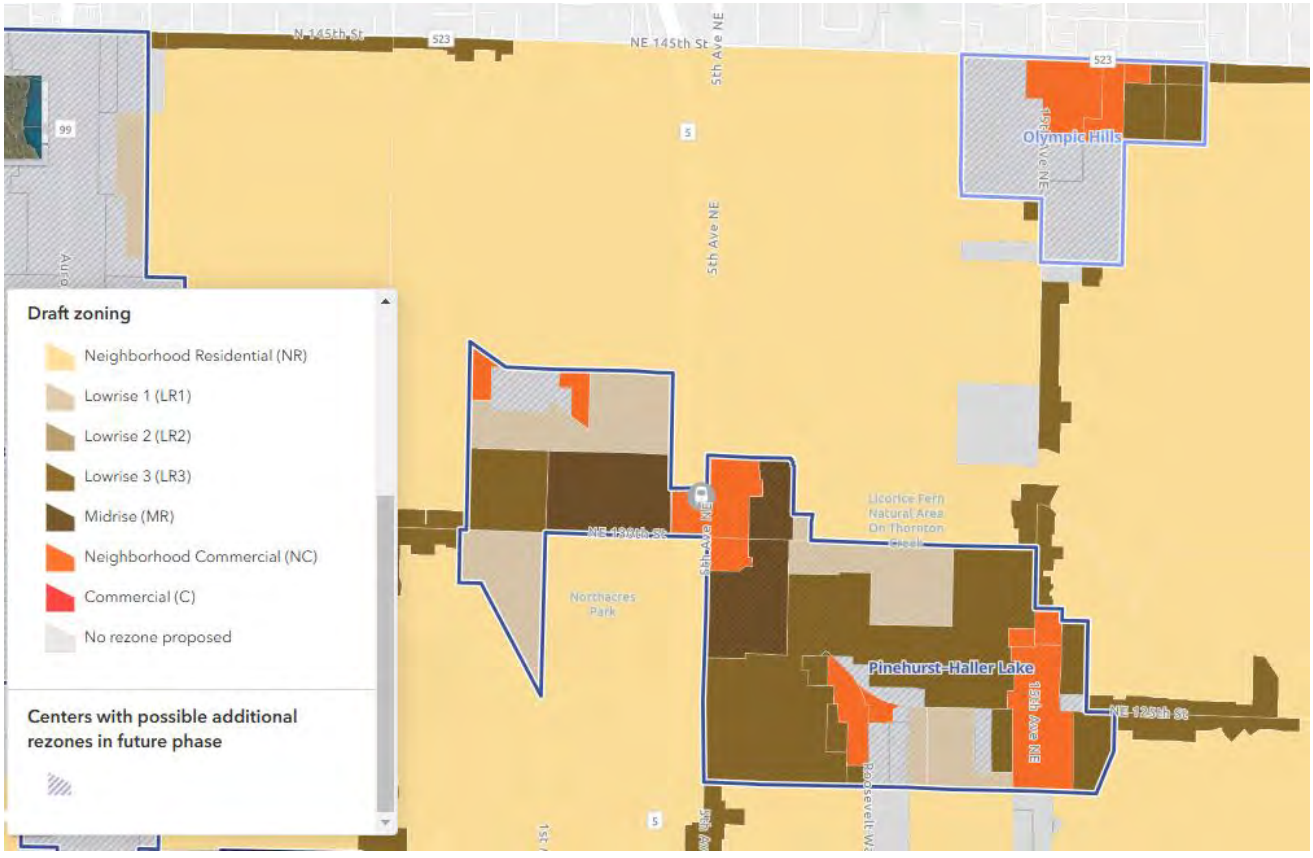
Notes: *See **Exhibit 2.1-1** for a crosswalk of existing place types (existing and Alternative 1) versus proposed place type names under Alternatives 25. The 130th Street and Pinehurst Neighborhood Centers from Alternative 2 are both part of the 130th Street Urban Center in Alternative 5.
The Preferred Alternative uses updated and more detailed information to calculate existing and future activity units per acre for each center than Alternatives 1–5. Existing activity units per acre by center are based on OFM's 2023 SAEP April 1 census block estimate of total population and PSRC's 2023 estimate of all jobs (estimated by starting with ESD Q1 Covered Employment and estimating the remaining jobs not covered by unemployment insurance) within the revised center boundaries of the Preferred Alternative. Future 2044 population by center was calculated using OFM's 2023 housing unit estimate, additional housing unit permits issued between April 1, 2023 and June 1, 2024 (since the 2023 OFM estimate), a citywide household occupancy rate of 93%, estimated existing people per household by center (per OFM's 2023 household and population estimates), and housing unit growth targets. Future 2044 jobs by center were calculated using PSRC's 2023 covered employment estimate and job growth targets. Future 2044 activity units per acre for each center are based on the combined estimated 2044 population and jobs and acres within each center (including revised center boundaries under the Preferred Alternative). See **Appendix B.
***Renamed Olympic Hills under the Preferred Alternative.
Source: OFM, 2023 (estimates of 2023 housing, households, household population, and group quarter population are from OFM's SAEP April 1 census block estimates); PSRC, 2023; City of Seattle, 2024; BERK, 2024.

Exhibit 2.4-30. 130th/145th Station Area Features—Preferred Alternative

Features	Preferred Alternative	Assumptions
Amount and Pattern of Growth	Potential new urban center and neighborhood center designations. Residential areas growth.	Similar to Alternative 5. Growth in housing units: 2,152 Growth in jobs: 658 Activity units (people and jobs): ▪ 130th: 7,210, 33.2 per acre ▪ 145th: 3,692, 69.6 per acre
Building Types for New Construction	Denser than Alt 2 with more mixed-use buildings and more home type variety. Similar to Alternative 5.	
Building Heights for New Construction	Greater than Alternatives 1 and 2. Similar to Alternative 5.	Urban Center: 85 ft Neighborhood Center: 40-75 feet Urban Neighborhood: 32 feet
Retail and Commercial	More retail and commercial locations	

Note: *See **Exhibit 2.1-1** for a crosswalk of existing place types (existing and Alternative 1) versus proposed place type names under the other alternatives.
Sources: City of Seattle; 2024; BERK, 2024.

Exhibit 2.4-31. 130th/145th Station Area Zoning Concepts—Preferred Alternative*



Notes: *See **Exhibit 2.1-1** for a crosswalk of existing place types (existing and Alternative 1) versus proposed place type names under the other alternatives.
Sources: City of Seattle, 2024.

2.4.7 Summary of Alternatives

Exhibit 2.4-32 summarize the alternatives studied in this EIS.

Exhibit 2.4-32. Summary of Alternatives and Place-Based Growth and Form—Citywide

Alternative*	Alternative 1: No Action	Alternative 2: Focused	Alternative 3: Broad	Alternative 4: Corridor	Alternative 5: Combined	Preferred Alternative
Addresses Periodic Update Policies and Code	2035 Comprehensive Plan and current municipal code continues. Housing and job growth targets for 2044 can be met.	New One Seattle Plan prepared. Housing and job growth targets for 2044 can be met and higher housing assists in affordability targets and housing costs.	New One Seattle Plan prepared. Housing and job growth targets for 2044 can be met and higher housing assists in affordability targets and housing costs.	New One Seattle Plan prepared. Housing and job growth targets for 2044 can be met and higher housing assists in affordability targets and housing costs.	New One Seattle Plan prepared. Housing and job growth targets for 2044 can be met and higher housing assists in affordability targets and housing costs.	New One Seattle Plan prepared. Housing and job growth targets for 2044 can be met and higher housing assists in affordability targets and housing costs.
Description of Growth Estimates and Housing	Current plan is retained, and growth occurs under current policies but to the level of 2044 targets.	Allows more housing around existing neighborhood business districts.	Wider range of low-scale housing options in all NR zones.	Allow a wide range of housing types closer to transit in areas currently zoned exclusively for detached homes.	Combination of Alts 2-4.	Combination of Alts 2-5. Housing allowed in all place types including centers and corridors, and NR zones.
New Place Types and Areas of Change	None	Neighborhood center	Urban neighborhood	Corridor	Neighborhood centers, urban neighborhood, corridors, and select regional centers and urban centers	Neighborhood centers, urban neighborhood, corridors, and select regional centers and urban centers
Location of Changes	Per adopted plans. Growth strategy is retained with focus on urban centers and villages.	Generally within 1,000-foot radius (~ 3-4 blocks) of certain neighborhood business districts, trimmed to prevent overlap with industrial zoning or other growth areas.	All NR zones.	Near frequent transit and amenities. Within a 10-minute walk from a light rail station or a 5-minute walk from frequent BRT or entrances to large parks. Includes about 50% of areas currently zoned NR.	Combination of Alts 2-4.	Combination of Alts 2-5. Housing allowed in all place types including centers and corridors, and NR zones.
Uses in new place types and areas of change	N/A	Mix of residential and mixed-use development in neighborhood centers.	Still primarily residential in urban neighborhood zones with more flexibility for corner stores and home businesses.	Primarily residential in corridors with commercial along major streets.	Combination of Alts 2-4.	Combination of Alts 2-5.

Alternative*	Alternative 1: No Action	Alternative 2: Focused	Alternative 3: Broad	Alternative 4: Corridor	Alternative 5: Combined	Preferred Alternative
Common Housing Types in new place types and areas of change	N/A	▪ Duplex, triplex, and fourplex ▪ Townhouse & rowhouse ▪ Sixplex/3-story stacked flats ▪ 4- to 5-story buildings ▪ 6- to 7-story buildings	▪ Detached home ▪ Duplex, triplex, and fourplex ▪ Townhouse & rowhouse ▪ Sixplex/3-story stacked flats	▪ Detached home ▪ Duplex, triplex, and fourplex ▪ Townhouse & rowhouse ▪ Sixplex/3-story stacked flats ▪ 4- to 5-story buildings ▪ 6- to 7-story buildings	▪ Detached home ▪ Duplex, triplex, and fourplex ▪ Townhouse & rowhouse ▪ Sixplex/3-story stacked flats ▪ 4- to 5-story buildings ▪ 6- to 7-story buildings	▪ Detached home ▪ Duplex, triplex, and fourplex ▪ Townhouse & rowhouse ▪ Sixplex/3-story stacked flats ▪ 4- to 5-story buildings ▪ 6- to 7-story buildings
Base Heights	Urban centers: from 4-story to high-rise buildings (above 12 stores). Urban villages: from townhouse/ rowhouse to 12-story buildings. Neighborhood residential: 3-story buildings.	Up to 7 stories in neighborhood centers. No change to urban centers/village boundaries but place names change to regional center and urban center.	Market-rate development will continue to have a 3-story height limit, consistent with current rules in NR zones. No change to urban centers/village boundaries but place names change to regional center and urban center.	Up to 5 stories in most of corridors with potential for up to 7 stories in areas already zoned for Commercial or Multifamily. No change to urban centers/village boundaries but place names change to regional center and urban center.	Combination of Alts 2-4. Additional height up to 5 stories within expanded boundary of regional/urban centers.	Combination of Alts 2-5.
Bonuses	Per current code.	Per current code.	Potential height, floor area, or density bonuses for affordable housing projects in NR zones	Per current code.	Potential height, floor area, or density bonuses for affordable housing projects citywide.	Potential height, floor area, or density bonuses for affordable housing projects citywide.
Regional Center and Urban Center Boundaries	No change.	No change.	No change.	No change.	Designate Ballard as a regional center. Expand boundary of 7 regional/urban centers to include a 10-minute (½-mile) walkshed from their central point or light rail station. New 130th Station Area Urban Center (see below).	Designate Ballard as a regional center. Expanded boundaries in Squire Park and in small centers. Thirty new neighborhood centers including 5 expanded or shifted compared to Alts 2, 4, and 5. South Park redesignated as a neighborhood center. New 130th Station Area Urban Center (see below).

Alternative*	Alternative 1: No Action	Alternative 2: Focused	Alternative 3: Broad	Alternative 4: Corridor	Alternative 5: Combined	Preferred Alternative
130th/145th Station Area	No change.	Neighborhood centers with LR, MR, and NC3 zoning.	Develop consistent with the citywide framework.	Develop consistent with the citywide framework.	130th Station Area Urban Center with LR, MR, and NC2/3 zoning. 145th Station Area similar to Alt 2.	130th Station Area Urban Center with LR, MR, and NC2/3 zoning. 145th Station Area similar to Alt 2.
MICs	Incorporates changes proposed as part of the recent Industrial and Maritime Strategy EIS.	Same as Alt 1.	Same as Alt 1.	Same as Alt 1.	Same as Alt 1.	Same as Alt 1.

Note: The Preferred Alternative was added to this exhibit since the Draft EIS—no edits were made to Alternatives 1–5.
*Alternative 1, No Action, would retain the City's Seattle 2035 urban village strategy and center/village designations—the existing urban centers and villages are categorized here according to the new place types proposed under Alternatives 2–5 for comparison purposes only. Ballard would remain a "hub urban village" under Alternative 1, would be called an "urban center" under Alternatives 2-5, and would be redesignated as a regional center (as shown here) under Alternative 5. See **Exhibit 2.1-1** for a crosswalk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~A~~lternatives ~~2–5~~.
Sources: City of Seattle, 2024~~3~~; BERK, 2024~~3~~.

Alternative 1 No Action, studies the impact of adding 80,000 new homes and 158,000 jobs over 20 years, based on growth targets adopted by the King County Growth Management Council.[10] Alternatives 2, 3, and 4 study a total housing growth of 100,000 housing units (20,000 more than Alternative 1 No Action) to account for the potential additional housing that could occur within neighborhood centers, urban neighborhood areas, or corridors. Alternative 5 and the Preferred Alternative assumes growth of 120,000 housing units (40,000 more than the No Action Alternative) to account for the potential additional housing that could occur within the areas of change identified in Alternatives 2, 3, and 4 as well as changes to existing and new centers. All alternatives assume the same overall growth in jobs. See **Exhibit 2.4-33**.

Exhibit 2.4-33. Summary of Housing and Job Growth Share—Citywide Alternatives

	Alternative 1: No Action	Alternative 2: Focused	Alternative 3: Broad	Alternative 4: Corridor	Alternative 5: Combined	Preferred Alternative
Housing	80,000	100,000	100,000	100,000	120,000	120,000
Jobs	158,000	158,000	158,000	158,000	158,000	158,000

Note: The Preferred Alternative was added to this exhibit since the Draft EIS—no edits were made to Alternatives 1–5.
Sources: City of Seattle, 2024~~3~~; BERK, 2024~~3~~.

[10] Growth targets were set for the years 2019-2044, but in the EIS have been adjusted to match the required 20-year planning period for 2024-2044, to account for population, housing, and employment change for the years 2019-2023.

Under all alternatives, 80,000 units would be located in a similar distribution to Alternative 1, primarily in existing centers. Under the action alternatives, 20,000 or 40,000 additional housing units would be accommodated within new place types located throughout the city. This results in a shift in the percentage share of growth among study areas. For example, while absolute housing growth in Downtown/South Lake Union (Area 4) is constant at 19,413 housing units, the percent share of housing growth in Area 4 is lower under all the action alternatives than the No Action Alternative. Under Alternative 5 and the Preferred Alternative, both Areas 1 and 2 in North Seattle receive greater percent share of housing growth than Area 4. The Preferred Alternative includes less housing in Area 7 with South Park being designated a neighborhood center rather than an urban center. The expected growth distribution reflects zoning and capacity. **Exhibit 2.4-35** ~~Exhibit 1.4-7~~ and **Exhibit 2.4-36** show percent share of housing ~~target~~ growth by study area and alternative, with the two highest study area percent shares under each alternative highlighted orange.

Exhibit 2.4-34. Housing Growth Estimates Percent Share by Study Area—Citywide Alternatives

Study Area	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Preferred
Area 1 Northwest	17.2%	18.4%	17.6%	17.2%	17.9%	21.4%
Area 2 Northeast	16.0%	18.3%	20.2%	21.0%	19.6%	19.6%
Area 3 West	7.5%	8.1%	6.7%	6.6%	6.8%	7.5%
Area 4 Downtown/South Lake Union	24.3%	19.4%	19.4%	19.4%	16.2%	15.9%
Area 5 East	16.6%	16.3%	13.8%	13.8%	13.4%	14.7%
Area 6 Southwest	7.7%	9.4%	10.2%	10.1%	11.5%	10.6%
Area 7 Duwamish Manufacturing Center	2.4%	2.3%	1.9%	2.0%	3.0%	1.3%
Area 8 Southeast	8.3%	7.9%	10.2%	9.9%	11.6%	8.9%
Total	**100.0%**	**100.0%**	**100.0%**	**100.0%**	**100.0%**	**100.0%**

Note: The two highest percent shares under each alternative by study area are highlighted orange. The Preferred Alternative was added to this exhibit since the Draft EIS—no edits were made to Alternatives 1–5.
Sources: City of Seattle, 2024~~3~~; BERK, 2024~~3~~.

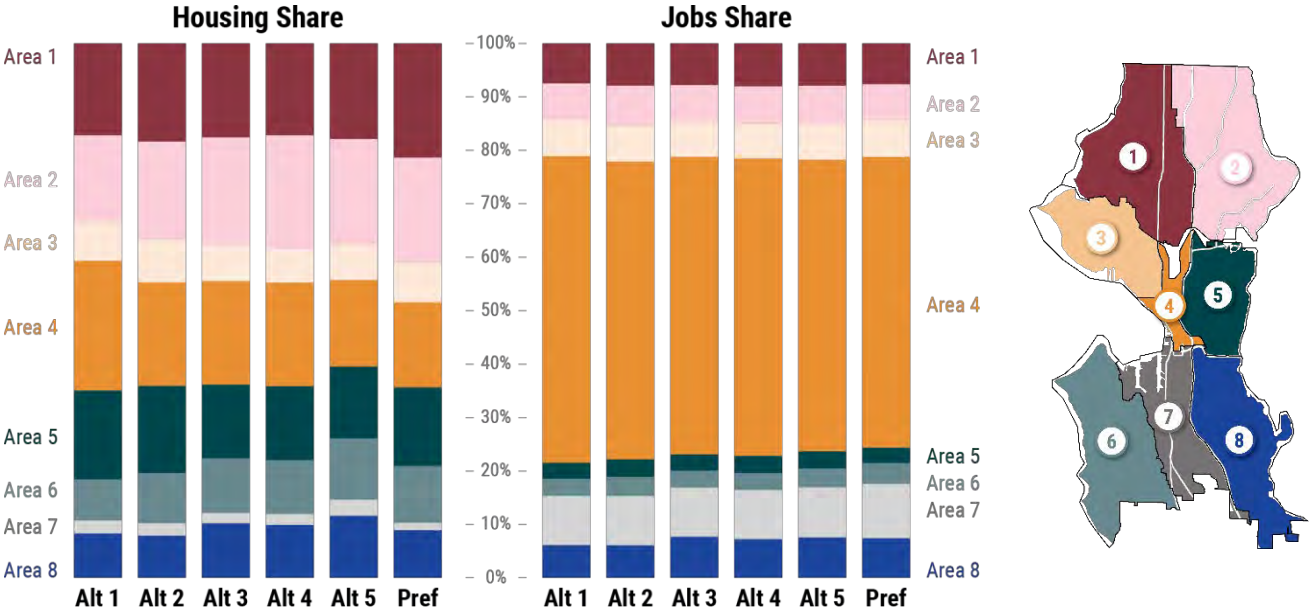
All alternatives assume the same overall growth in jobs with a little over half of job growth in Downtown/South Lake Union (Area 4) and about 9% in the Duwamish Manufacturing Center (Area 7). Alternatives 2, 3, and 4 assume a small job shift from the larger centers towards other place types to reflect local demand consistent with the distribution of new housing. The distribution of jobs and housing under Alternative 5 would be a combination of the other alternatives after accounting for expanded regional and urban center boundaries and potential changes to place type designations. The Preferred Alternative similarly focuses the bulk of jobs in Areas 4 and 7 with slight shifts in jobs based on an evaluation of capacity and zoning. See **Exhibit 2.4-35** and **Exhibit 2.4-36**.

Exhibit 2.4-35. Job Growth Estimates Percent Share by Study Area—Citywide Alternatives

Study Area	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Preferred
Area 1 Northwest	7.5%	7.9%	7.8%	8.1%	7.9%	7.6%
Area 2 Northeast	6.9%	7.4%	6.9%	6.9%	7.2%	6.7%
Area 3 West	6.7%	6.9%	6.6%	6.6%	6.7%	6.9%
Area 4 Downtown/South Lake Union	57.4%	55.7%	55.7%	55.7%	54.6%	54.4%
Area 5 East	3.0%	3.3%	3.1%	3.2%	3.2%	2.9%
Area 6 Southwest	3.2%	3.5%	3.2%	3.2%	3.5%	3.9%
Area 7 Duwamish Manufacturing Center	9.2%	9.2%	9.2%	9.2%	9.3%	10.1%
Area 8 Southeast	6.1%	6.1%	7.7%	7.2%	7.6%	7.4%
Total	**100.0%**	**100.0%**	**100.0%**	**100.0%**	**100.0%**	**100.0%**

Note: The two highest percent shares under each alternative by study area are highlighted orange. The Preferred Alternative was added to this exhibit since the Draft EIS—no edits were made to Alternatives 1–5.
Sources: City of Seattle, 2024~~3~~; BERK, 2024~~3~~.

Exhibit 2.4-36. Comparison of Housing and Jobs Growth Estimates Percent Share by Study Area—Citywide Alternatives



Note: The Preferred Alternative was added to this exhibit since the Draft EIS—no edits were made to Alternatives 1–5.
Sources: City of Seattle, 2024~~3~~; BERK, 2024~~3~~.

Exhibit 2.4-37 and **Exhibit 2.4-38** compare estimated total housing units and jobs by center.[11]

[11] Note that the Preferred Alternative uses updated and more detailed information to estimate existing (2024) and future (2044) housing units than Alternatives 1–5. See the note under **Exhibit 2.4-37** and **Exhibit 2.4-38** and **Appendix B** for more detail.

Exhibit 2.4-37. Comparison of Estimated Total Housing Units by Center—Citywide Alternatives

Center[1]	Existing (Draft EIS)[4]	Alt. 1	Alt. 2	Alt. 3	Alt. 4	Alt. 5	Existing (Pref.)[4]	Preferred[4]
Regional Centers								
Downtown	34,696	48,354	48,354	48,354	48,354	48,354	34,862	48,362
First Hill/Capitol Hill	40,139	49,200	49,200	49,200	49,200	49,200	43,861	53,361
University Community	11,792	15,654	15,654	15,654	15,654	15,654	15,743	19,743
South Lake Union	11,199	15,806	15,806	15,806	15,806	15,806	11,627	16,127
Uptown	8,837	12,432	12,432	12,432	12,432	12,471	11,392	14,892
Northgate	5,171	7,358	7,358	7,358	7,358	7,358	5,274	7,274
Hub Urban Centers								
Ballard[2]	12,259	17,301	17,301	17,301	17,301	18,301	12,465	18,465
Bitter Lake Village	3,439	4,448	4,448	4,448	4,448	4,448	3,997	5,007
Fremont	3,990	5,527	5,527	5,527	5,527	5,527	4,418	5,953
Lake City	2,834	3,761	3,761	3,761	3,761	3,761	3,375	4,300
Mt Baker	4,295	5,537	5,537	5,537	5,537	5,537	4,320	5,560
West Seattle Junction	6,452	9,580	9,580	9,580	9,580	9,592	7,662	11,292
Residential Urban Centers								
130th Street[2]	1,436	1,630	2,485	NA	NA	3,080	1,489	2,989
23rd & Union-Jackson[3] *Central District* *Judkins Park*	8,577	10,554	10,554	10,554	10,554	10,554	— *3,317* *7,230*	— *4,687* *8,630*
Admiral	1,265	1,680	1,680	1,680	1,680	2,110	2,107	3,022
Aurora-Licton Springs	4,268	5,220	5,220	5,220	5,220	5,220	4,268	5,218
Columbia City	4,023	5,507	5,507	5,507	5,507	5,507	4,462	5,947
Crown Hill	2,636	3,279	3,279	3,279	3,279	3,279	2,984	3,629
Eastlake	4,090	5,100	5,100	5,100	5,100	5,100	4,566	5,576
Green Lake	2,791	3,600	3,600	3,600	3,600	3,600	2,777	3,587
Greenwood-Phinney Ridge	2,546	3,047	3,047	3,047	3,047	3,063	3,404	4,404
Madison-Miller	3,770	4,986	4,986	4,986	4,986	4,986	3,822	5,037
Morgan Junction	1,549	1,878	1,878	1,878	1,878	2,988	2,325	3,155
North Beacon Hill	3,138	3,620	3,620	3,620	3,620	3,620	3,329	3,809
Othello[3] *Graham* *Othello*	4,357	5,486	5,486	5,486	5,486	7,005	— *1,519* *4,348*	— *2,996* *4,887*
Rainier Beach	2,365	2,739	2,739	2,739	2,739	4,489	2,517	3,892
Roosevelt	3,540	5,006	5,006	5,006	5,006	5,006	4,586	6,051
South Park[3]	1,368	1,627	1,627	1,627	1,627	3,027	NA	NA
Upper Queen Anne	1,564	1,966	1,966	1,966	1,966	1,993	3,007	3,907
Wallingford	3,425	4,342	4,342	4,342	4,342	4,342	3,965	4,880
Westwood-Highland Park	2,486	2,885	2,885	2,885	2,885	3,086	2,605	3,005
MICs								
Ballard-Interbay-Northend	138	766	766	766	766	766	651	951
Greater Duwamish	204	1,052	1,052	1,052	1,052	1,052	446	946

1 Organized by proposed place type under the action alternatives. See **Exhibit 2.1-1** for a cross-walk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~Alternatives 2–5~~.
2 Ballard would be redesignated as a regional center and a new urban center created at 130th Street under Alternative 5 and the Preferred Alternative.
3 Under the Preferred Alternative, 23rd & Union Jackson and Othello would be split into two urban centers each (Central District, Judkins Park, Othello, and Graham) and South Park would be redesignated as a neighborhood center.
4 The Preferred Alternative uses updated and more detailed information to estimate existing and future housing units than Alternatives 1–5. Existing housing units for the Draft EIS are estimated from 2022 data from OFM and the existing center boundaries. Under the Preferred Alternative, 2024 housing units by center were estimated using OFM's 2023 housing unit estimates and additional housing unit permits issued between April 1, 2023 and June 1, 2024 (since the 2023 OFM estimate) within the Preferred Alternative revised center boundaries. Future 2044 housing units for the Preferred Alternative are the 2024 base estimate plus housing growth targets. See **Appendix B**.
Sources: OFM SAEP April 1 census block estimates, 2022 and 2023; City of Seattle, 2024~~3~~; BERK, 2024~~3~~.

Exhibit 2.4-38. Comparison of Estimated Total Jobs by Center—Citywide Alternatives

Center[1]	Existing (Draft EIS)[4]	Alt. 1	Alt. 2	Alt. 3	Alt. 4	Alt. 5	Existing (Pref.)[4]	Preferred[4]
Regional Centers								
Downtown	288,234	351,383	349,489	349,489	349,489	348,226	187,799	247,799
First Hill/Capitol Hill	45,527	48,886	48,785	48,785	48,785	48,718	50,654	53,654
University Community	16,911	20,799	20,682	20,682	20,682	20,605	36,741	40,241
South Lake Union	57,498	84,563	83,751	83,751	83,751	83,210	77,542	103,042
Uptown	25,643	28,289	28,210	28,210	28,210	28,157	15,174	17,674
Northgate	13,010	15,862	15,776	15,776	15,776	15,719	10,222	12,722
Hub Urban Centers								
Ballard[2]	8,434	12,563	12,439	12,439	12,439	12,531	8,430	12,430
Bitter Lake Village	8,965	11,029	10,967	10,967	10,967	10,926	4,142	6,207
Fremont	7,251	7,562	7,553	7,553	7,553	7,546	7,552	7,862
Lake City	2,387	3,009	2,990	2,990	2,990	2,978	1,379	1,999
Mt Baker	8,884	11,937	11,845	11,845	11,845	11,784	5,236	8,286
West Seattle Junction	5,745	7,342	7,288	7,288	7,288	7,271	4,879	6,479
Residential Urban Centers								
130th Street[2]	1,062	1,171	1,346	NA	NA	1,418	494	854
23rd & Union-Jackson[3] *Central District* *Judkins Park*	6,765	7,444	7,424	7,424	7,424	7,410	— *1,180* *5,037*	— *1,312* *5,585*
Admiral	2,249	2,499	2,492	2,492	2,492	2,560	2,100	2,350
Aurora-Licton Springs	5,679	6,095	6,083	6,083	6,083	6,074	2,653	3,068
Columbia City	3,105	4,153	4,122	4,122	4,122	4,101	3,301	4,351
Crown Hill	1,459	1,787	1,777	1,777	1,777	1,771	1,181	1,511
Eastlake	5,601	5,882	5,874	5,874	5,874	5,868	6,318	6,598
Green Lake	1,953	2,120	2,115	2,115	2,115	2,112	1,879	2,049
Greenwood-Phinney Ridge	2,737	3,320	3,301	3,300	3,300	3,300	2,207	2,792
Madison-Miller	1,759	2,147	2,135	2,135	2,135	2,128	1,978	2,358
Morgan Junction	690	861	856	856	856	1,044	861	1,031
North Beacon Hill	1,073	1,775	1,754	1,754	1,754	1,740	1,424	2,124
Othello[3] *Graham* *Othello*	2,892	3,234	3,257	3,257	3,257	3,534	— *894* *886*	— *1,123* *997*
Rainier Beach	3,119	3,400	3,392	3,392	3,392	3,690	1,106	1,386
Roosevelt	3,191	3,557	3,546	3,546	3,546	3,539	1,959	2,324
South Park[2]	1,075	1,525	1,512	1,512	1,512	1,746	NA	NA
Upper Queen Anne	1,503	1,784	1,776	1,776	1,776	1,770	2,608	2,888
Wallingford	3,847	4,373	4,357	4,357	4,357	4,347	2,888	3,413
Westwood-Highland Park	2,572	3,048	3,034	3,034	3,034	3,059	1,613	2,088
MICs								
Ballard-Interbay-Northend	17,377	23,477	23,477	23,477	23,477	23,477	17,942	24,042
Greater Duwamish	61,917	74,617	74,617	74,617	74,617	74,617	66,631	79,331

1 Organized by proposed place type under the action alternatives. See **Exhibit 2.1-1** for a cross-walk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~Alternatives 2–5~~.
2 Ballard would be redesignated as a regional center under Alternative 5 and the Preferred Alternative.
3 Under the Preferred Alternative, 23rd & Union Jackson and Othello would be split into two urban centers each (Central District, Judkins Park, Othello, and Graham) and South Park would be redesignated as a neighborhood center.
4 The Preferred Alternative uses updated and more detailed information to estimate existing and future jobs than Alternatives 1–5. Existing jobs for the Draft EIS were estimated based on summarized data from PSRC and the existing center boundaries (e.g., these are not based on site level data and are used as estimates for comparing the alternatives only). Under the Preferred Alternative, 2023 existing jobs by center are based on PSRC's covered employment estimates within the Preferred Alternative revised center boundaries. Future 2044 jobs for the Preferred Alternative are the 2023 PSRC estimate plus job growth targets. See **Appendix B**.
Sources: PSRC, 2023; City of Seattle, 2024~~3~~; BERK, 2024~~3~~.

Sidewalk with landscaped buffer along Meridian Ave N at N 140th Street. Source: City of Seattle 130th and 145th Station Area Planning Multimodal Mobility Study, December 2020.

130th/145th Station Area

Exhibit 2.4-39~~Exhibit 1.4-10~~ summarizes the land use concepts under the Alternative 1~~,~~ No Action, and the ~~two~~ three alternatives that have a more detailed approach in the 130th/145th Station Area. Alternative 1 retains the current Comprehensive Plan and zoning designations. No new areas would be designated for mixed-use or higher density, and building types outside existing commercial zoning would remain primarily detached homes with some 4- 8-story multifamily uses near the 145th BRT station. Under Alternatives 3 and 4, changes in the 130th/145th station areas would be consistent with the changes described citywide. Under Alternative 2, three neighborhood centers would be designated in the station areas with Low-rise Residential, Midrise Residential, and Neighborhood Commercial (NC3) zoning. Compared to Alternative 1, development under Alternative 2 would be more mixed use near the 145th Station Area and to the east of I-5 in the 130th Station Area (including both the 130th Street and Pinehurst centers). Most of the housing proposed under Alternative 2 would be near the 145th Station Area and job growth would be modest. Under Alternative 5 and the Preferred Alternative, an urban center would be created on both the west and east sides of I-5 at the Sound Transit light rail station at 130th with Low-rise Residential, Midrise Multifamily, and Neighborhood Commercial (2 and 3) zoning. The 130th Station Area would see the greatest increase in housing and job growth under Alternative 5 and the Preferred Alternative. Similar to Alternative 2, the 145th Station Area would be designated as neighborhood center under Alternative 5 and the Preferred Alternative with similar zoning and housing growth and slightly fewer jobs. Key policy issues are described under Alternative 2.

Exhibit 2.4-39. Summary of Alternatives—130th/145th Station Areas

Feature	Alternative 1: No Action (aligns with citywide Alt 1)*	Alternative 2: Focused (aligns with citywide Alt 2)*	Alternative 5: More & Distributed Growth (aligns with citywide Alt 5)*	Preferred Alternative
Amount** and Pattern of Growth	Baseline growth and pattern. Growth in housing units: 840 Growth in jobs: 716	Cluster growth in newly designated small mixed-use node(s) and near transit. Growth in housing units: 2,208 Growth in jobs: 979	Potential new uUrban center and corridor designations. Residential areas growth. Growth in housing units: 2,703 Growth in jobs: 1,004	Similar to Alt 5.with regard to designations and pattern. Growth in housing units: 2,152 Growth in jobs: 658
Building Types for New Construction	No change (single family, accessory dwelling units, limited multifamily and mixed use).	Denser and taller buildings in nodes. More mixed-use buildings.	Denser than Alt 2 with more mixed-use buildings and more home type variety.	Similar to Alt 5.
Building Heights for New Construction	No change Multifamily and mixed use: 45–80 ft Neighborhood Residential: 30 ft	Nodes: Potentially up to 40 – 80 ft	Urban Center: 95 ft Neighborhood CenterCorridors: Potentially up to 40-80 ft Urban Neighborhood: Same as Alt 1 or 2	Urban Center: 85 ft Neighborhood Center: 40-75 feet Urban Neighborhood: 32 feet
Retail and Commercial	No change	Could include more retail and commercial locations than Alt 1	More retail and commercial locations than Alt 2	Similar to Alt 5.

Note: The Preferred Alternative was added to this exhibit since the Draft EIS—a minor correction made to Alternatives 5 is shown in tracks.

* Alternative 1, No Action, would retain the City's Seattle 2035 urban village strategy and center/village designations—the existing urban centers and villages are categorized here according to the new place types proposed under Alternatives 2-5 and the Preferred Alternative for comparison purposes only. See **Exhibit 2.1-1** for a crosswalk of existing place types (existing and Alternative 1) versus proposed place type names under the other aAlternatives 2-5

** The growth estimates consider the current zoning within a common maximum boundary (Alternative 5 and the Preferred Alternative). The 130th Street and Pinehurst Neighborhood Center from Alternative 2 are both within the 130th Street Urban Center boundary in Alternative 5 and the Preferred Alternative.

Sources: City of Seattle, 2024~~3~~; BERK, 2024~~3~~.

University Community. Source: City of Seattle, 2023.

2.4.8 Transportation Planning & Alternatives

As described in the One Seattle EIS Scoping Notice in 2022, the One Seattle Comprehensive Plan EIS is intended to evaluate the effect of the Comprehensive Plan land use and growth on the transportation system and identify impacts and mitigation. The Seattle Transportation Plan (STP) process provides a separate EIS to test multimodal transportation system changes.

The One Seattle Comprehensive Plan Update Draft EIS evaluated~~s~~ the effect of the Comprehensive Plan land use and growth on the city's transportation system holding the network constant to adopted plans (the No Action network), and it identifies associated impacts and potential mitigation measures.

The STP provides a separate EIS to test multimodal transportation system changes. The STP considers how the level of investment in infrastructure for people walking, biking, and riding transit could improve transportation outcomes. Network alternatives under consideration in the STP EIS include:

- No Action: Reflects currently adopted transportation plans.
- Moderate Pace: This alternative envisions a future with moderate growth in funding for new multimodal infrastructure in Seattle's transportation system.
- Rapid Progress: This alternative envisions a future with strong growth in funding for expanded and enhanced multimodal infrastructure in Seattle's transportation system.

The City issued a Draft EIS for the STP with its own comment period followed by a Final EIS (see Seattle Transportation Plan website at https://seattle.gov/transportation/projects-and-programs/programs/seattle-transportation-plan). The STP EIS tests the same Alternative 1 and Alternative 5 growth alternatives in relation to the alternative multimodal networks to consider the potential network in relation to a range of growth to identify an optimal network that advances city multimodal goals and objectives.

With the Final EIS, an updated proposed network is evaluated both with the No Action Alternative and the Preferred Alternative. The long-term Seattle Transportation Plan concepts are implemented during the 20-year planning period by the Transportation Element and Capital Facilities Plan. This Final EIS considers these proposals in **Section 3.10 Transportation.**

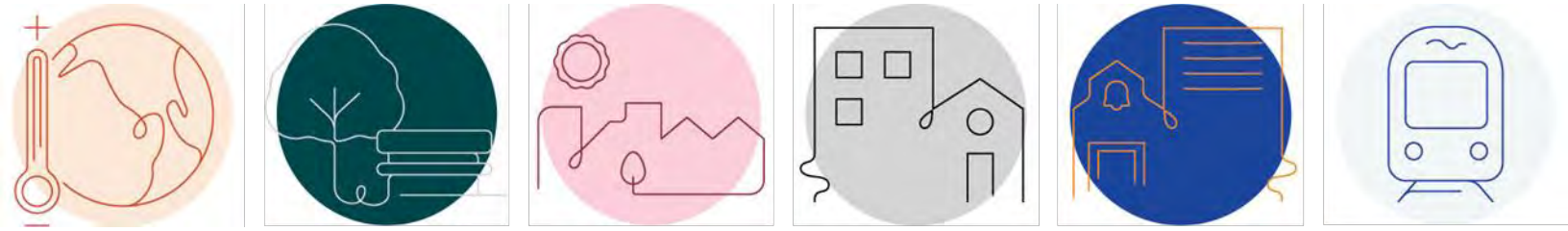
2.5 Benefits & Disadvantages of Delaying the Proposed Action

The benefits of delaying the proposed action are to retain a growth strategy that meets the minimum growth targets, which would create less capacity for housing and potentially less conversion of tree canopy. There would also be a lower demand for public services and utilities, and less reduction in travel time on the transportation system.

The disadvantages of delaying the proposal would include less housing capacity and future housing supply, potential continued pressure on the housing market, and lack of consistency with affordable housing targets. There would be less consistency with State requirements to address racial disparities and undo harm, particularly in creating housing opportunities including ownership housing. A capital facilities plan would not be updated to direct resources to address demand due to growth, or to address emerging needs for climate adaptation.

If growth is more restricted in Seattle and otherwise occurs in the region, this could result in impacts to air quality and greenhouse gas emissions, greater energy consumption, erosion of ecosystem functions and pressure on natural resources, and other impacts identified in VISION 2050. With more dispersed regional growth there could be greater household transportation costs and costs to extend utility infrastructure.

3 ENVIRONMENT, IMPACTS, & MITIGATION MEASURES



Source: City of Seattle, 2023.

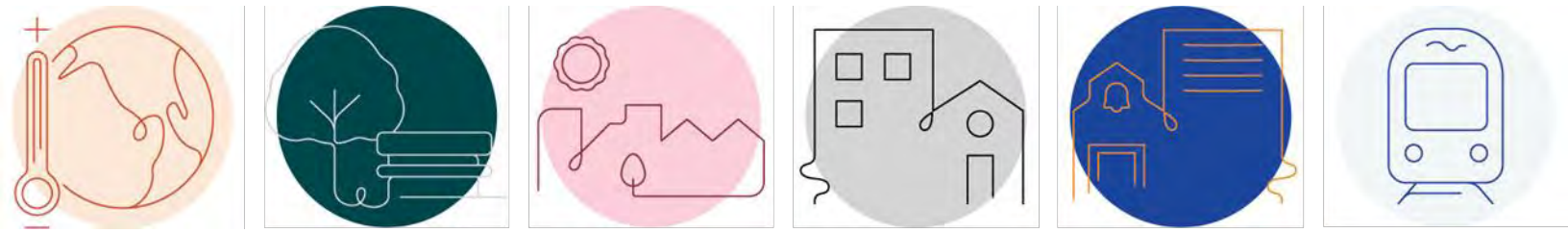
This chapter describes the affected environment, potential impacts, and mitigation measures for the following topics:

- **Section 3.1 Earth & Water Quality**
- **Section 3.2 Air Quality & GHG Emissions**
- **Section 3.3 Plants & Animals**
- **Section 3.4 Energy & Natural Resources**
- **Section 3.5 Noise**
- **Section 3.6 Land Use Patterns & Urban Form**
- **Section 3.7 Relationship to Plans, Policies, & Regulations**
- **Section 3.8 Population, Housing, & Employment**
- **Section 3.9 Cultural Resources**
- **Section 3.10 Transportation**
- **Section 3.11 Public Services**
- **Section 3.12 Utilities**

Following a description of current conditions (affected environment), the analysis compares and contrasts the alternatives and provides mitigation measures for identified impacts. It also summarizes whether there are significant unavoidable adverse impacts.

The analysis is broad, areawide, and comparative, considering the non-project proposals (WAC 197-11-442). Where there is a potential for more than a moderate adverse impact on environmental quality (WAC 197-11-794), existing or potential mitigation measures are posed. Consistent with the non-project analysis, mitigation measures are policy, plan, regulation, or program activities that the City could undertake to limit impacts.

3.1 Earth & Water Quality



Source: City of Seattle, 2023.

This section discusses critical land areas and water resources in the study area, including:

- Landslide hazard areas
- Steep slopes
- Potential soil settlement areas
- Surface waters (streams, lakes, and marine waters)
- Shorelines
- Groundwater

Thresholds of significance of this earth and water resources impact analysis involve comprehensive planning changes that could result in the following:

- Runoff Increases: Impervious surface expansions that would increase runoff flow volumes and durations to streams by magnitudes resulting in bank scour and erosion;
- Surface Water Quality: Increases in amount of pollution to receiving waters that would impair their designated uses (such as human contact and fish habitat);
- Groundwater Recharge: Impervious surface expansions that would decrease groundwater recharge beyond designated limits;
- Groundwater Quality: increases in amount of pollution discharged to levels that would contaminate groundwater supplies;
- Environmental Earth and Soil Hazards: Disturbances of existing contaminated areas to levels that could endanger human health or the environment;
- Climate Change—Extreme Precipitation: Growth concentrated into areas that are reasonably expected to be at risk for future flooding and landslides; and
- Climate Change—Sea-level Rise: Growth concentrated into areas that are reasonably expected to be at risk for future sea-level rise.

3.1.1 Affected Environment

Citywide

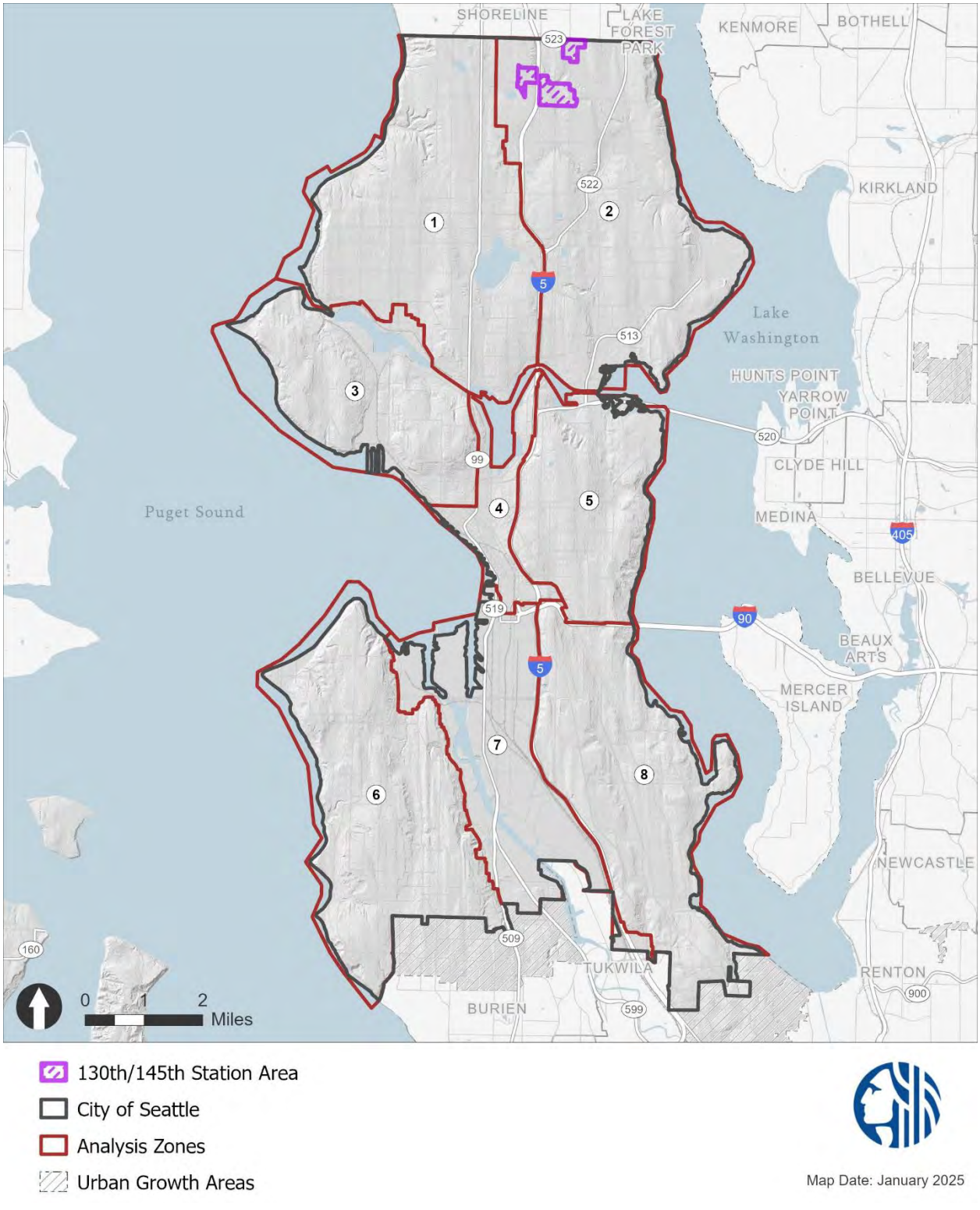
Critical Land Areas

Seattle's landforms consist of glacial-influenced, generally hilly terrain, bounded by Lake Washington on the east and Elliott Bay and Puget Sound on the west. City topography is presented in **Exhibit 3.1-1**. Areas around the Duwamish Waterway, Interbay, and the Thornton Creek valley contain alluvial or sandy soil conditions that pose a higher risk of movement and/or liquefaction during major earthquake events. In addition, steep slopes and known landslide locations have been documented throughout the city, with focus along shorelines and stream corridors. There are also Category 1 and Category 2 peat settlement-prone areas throughout the city, with Category 1 classified as higher quality environment with stricter protections than Category 2. Critical land areas in the city are shown in **Exhibit 3.1-2**.

Landcover & Hard Surfaces

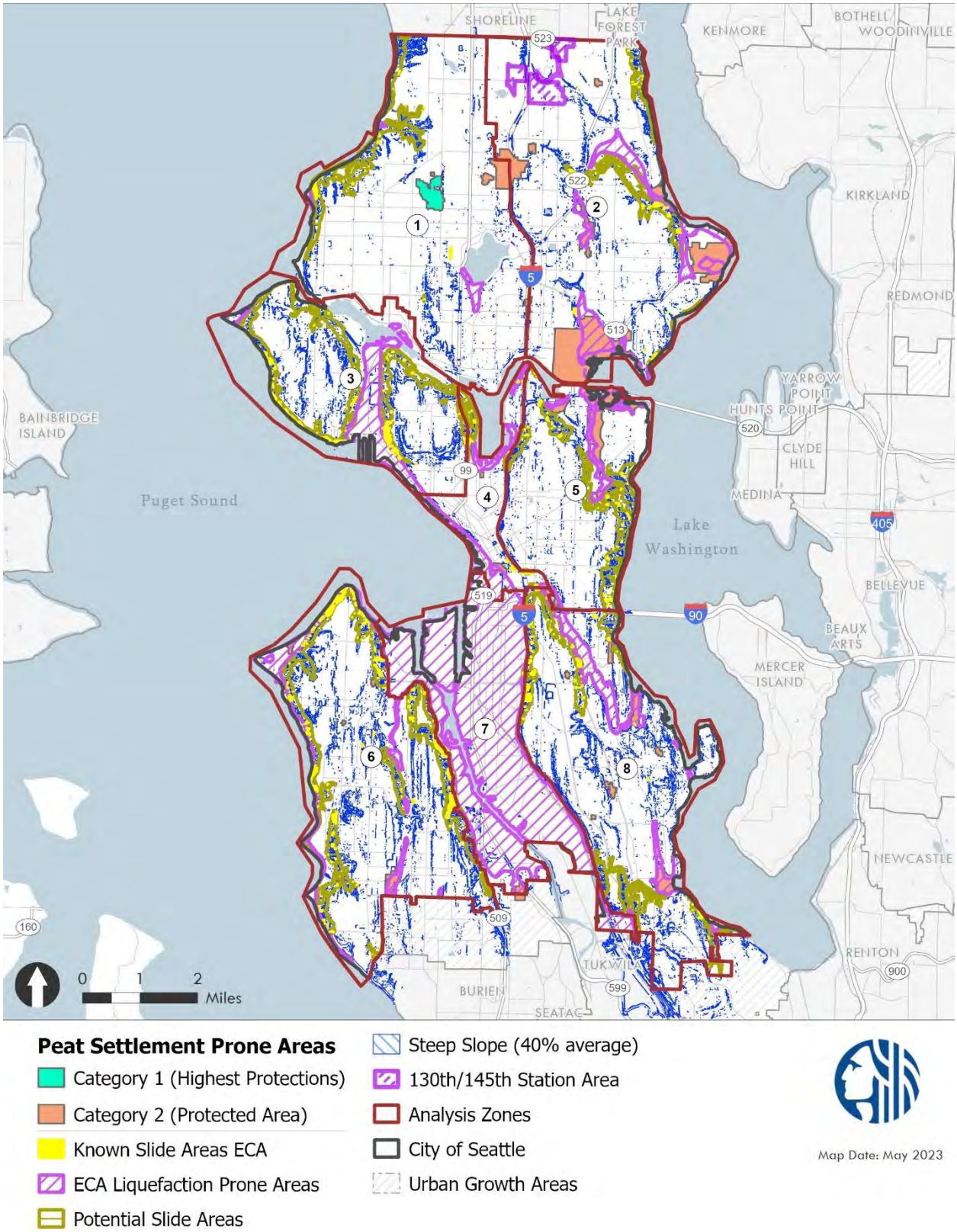
Landcover across most of the city has been extensively modified for over a century by development. The Washington State Department of Ecology has mapped areas in the state that have had over 40% impervious cover for about the last 40 years, and many of these areas are concentrated in Seattle as shown in **Exhibit 3.1-3**.

Exhibit 3.1-1. Topography



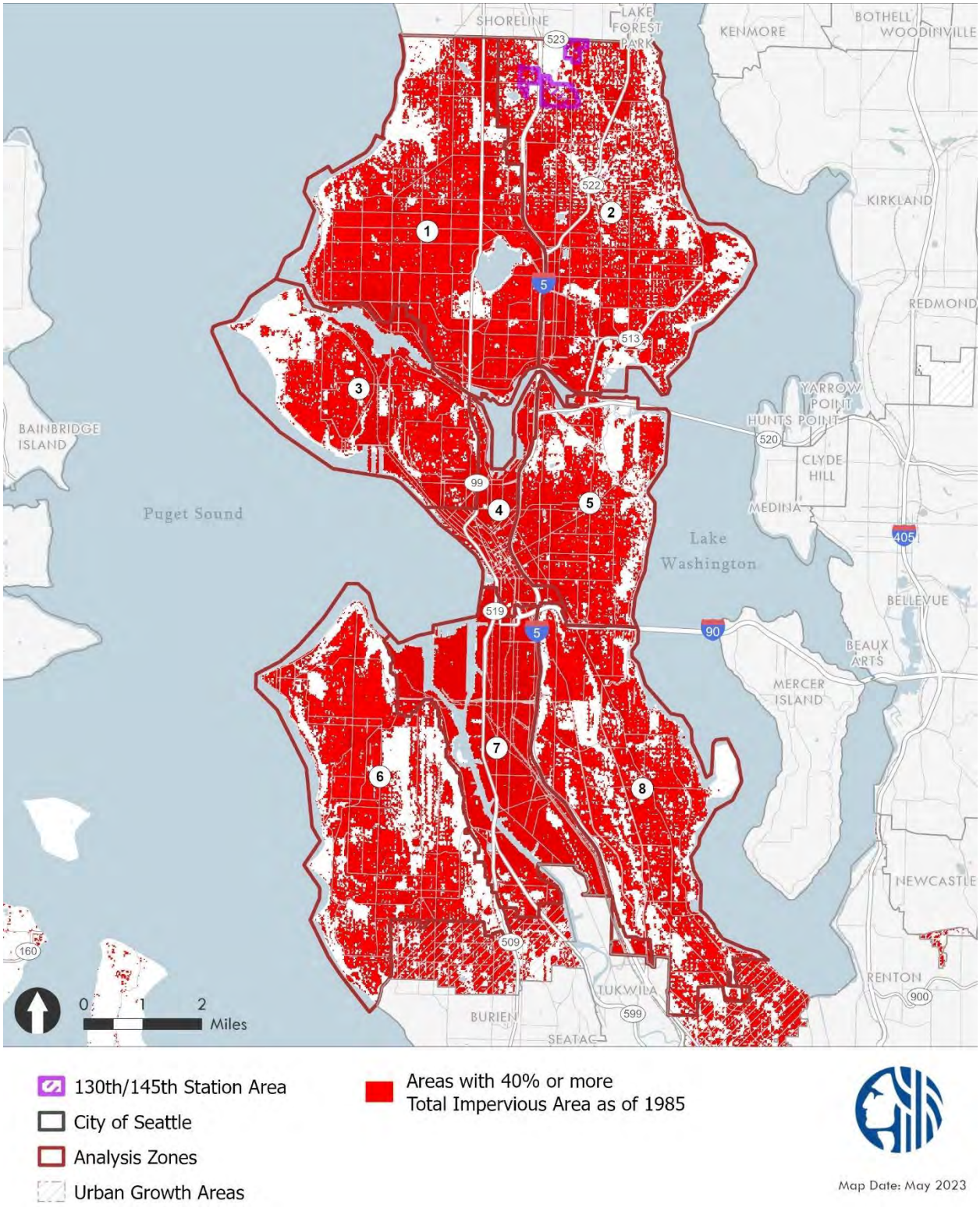
Note: This exhibit was updated in the Final EIS to remove fill color from cities outside of Seattle.
Sources: King County 2023a; Seattle, 2023.

Exhibit 3.1-2. Critical Land Areas



Source: Seattle, 2023.

Exhibit 3.1-3. Historically Impervious Surfaces



Sources: Ecology, 2019a; Seattle, 2023.

Surface Water

The City categorizes surface waters in four regulated classifications. These categories and an overview of their associated water bodies are summarized in **Exhibit 3.1-4**. Mapping of relevant surface water features, floodplains, water quality, and other characteristics is shown in **Exhibit 3.1-5** through **Exhibit 3.1-8.** Surface water fish presence, habitat, and wetland protections are discussed in **Section 3.3 Plants & Animals**. The municipal drainage system and combined sewer treatment areas are discussed in **Section 3.12 Utilities**.

Shorelines

Seattle has a major saltwater shoreline along its western boundary with Puget Sound, Elliott Bay, and the Duwamish Waterway. Along the city's eastern boundary, Lake Washington is classified as a Lake of Statewide Significance under WAC 173-20-370 and is protected against certain uses of its shoreline. Several of the city's shorelines have been impacted by port and industrial activities around Elliott Bay, Lake Union, and Ballard; and engineering activities such as the construction of the Ballard Locks, Montlake Cut, Harbor Island; and modifications to the Duwamish Waterway. Other shorelines across the city have low-density residential development while others are in more natural conditions**. Exhibit 3.1-9** depicts city shoreline environments.

Groundwater

As previously discussed, the land across the city has been heavily modified through development over the past 100 years. As such, groundwater recharge is limited. Also, groundwater use is generally limited to emergency and industrial supply wells for non-drinking use, with wells shown in **Exhibit 3.1-10**. No drinking water wells, wellhead protection areas, critical aquifer recharge areas, or sole source aquifers are identified in the study area.

Sea Level Rise

Areas of the city most susceptible to sea level rise are shown in **Exhibit 3.1-11.**

Socioeconomic Environmental Health Disparity

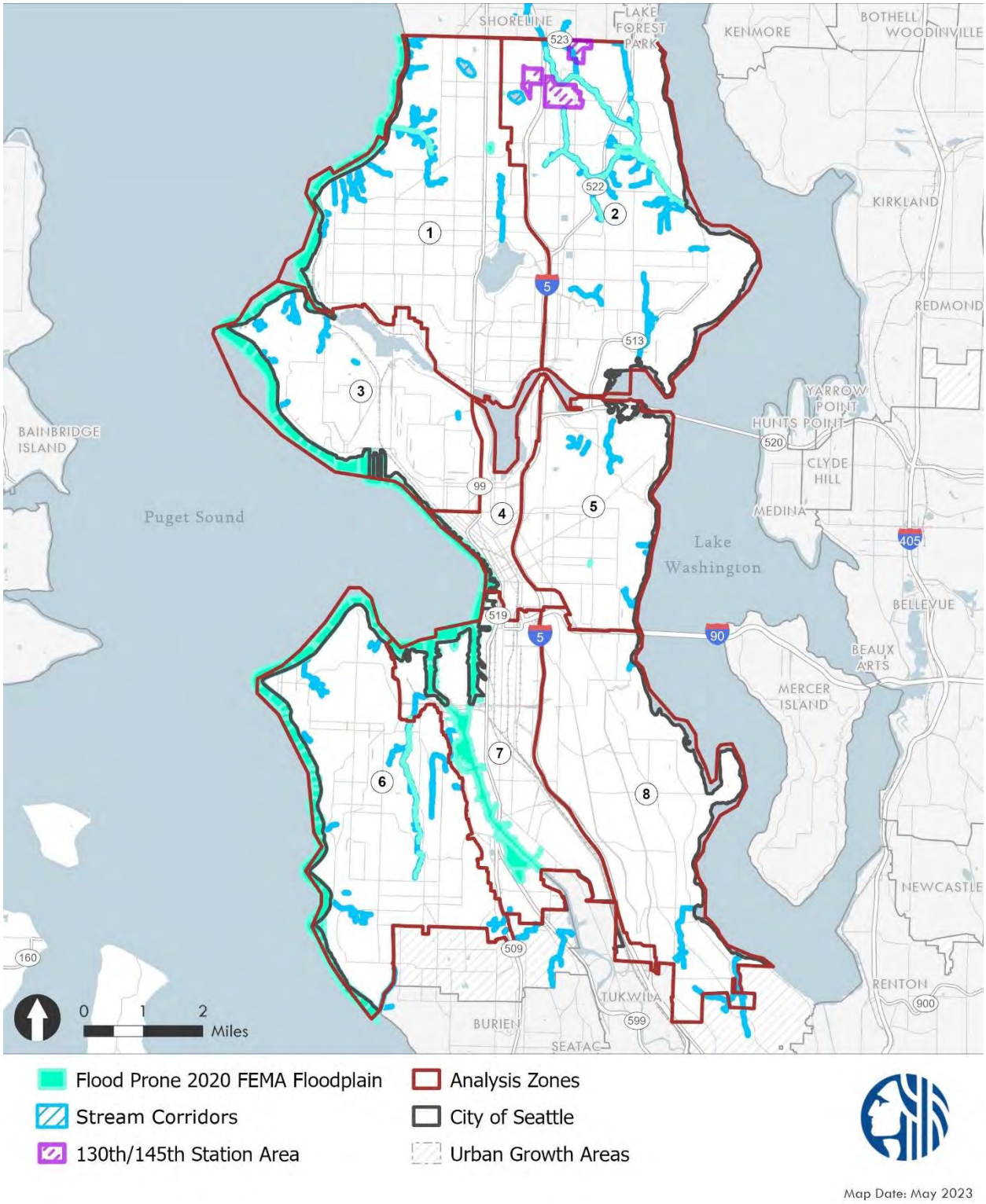
The Washington State Department of Health (WA DOH) has compiled state and national data to map over a dozen indicators of community and environmental health, including factors like proximity to hazardous waste facilities, proximity to wastewater discharges, income, and race. The data have been combined into a cumulative score to compare environmental and socioeconomic risk factors across all of Washington US census tracts. The compiled environmental health disparity scores for the US census tracts in Seattle are shown in **Exhibit 3.1-12.**

Exhibit 3.1-4. Seattle Surface Waters

City Category	Water Body	Water Quality Impairments	Flow Control Standards
Listed creeks	▪ Blue Ridge Creek ▪ Broadview Creek ▪ Discovery Park Creek ▪ Durham Creek ▪ Frink Creek ▪ Golden Gardens Creek ▪ Kiwanis Ravine/Wolfe Creek ▪ Licton Springs Creek ▪ Madrona Park Creek ▪ Mee-Kwa-Mooks Creek ▪ Mount Baker Park Creek ▪ Puget Creek ▪ Riverview Creek ▪ Schmitz Creek ▪ Taylor Creek ▪ Washington Park Creek	▪ Taylor Creek—temperature	Generally stricter flow control standards for development that require meeting forested-condition targets.
Non-listed creeks	▪ Fauntleroy Creek ▪ Longfellow Creek ▪ Piper's Creek ▪ Thornton Creek ▪ Any other stream not listed	▪ Fauntleroy Creek—bacteria ▪ Longfellow Creek—bacteria, dissolved oxygen, temperature ▪ Piper's Creek—bacteria ▪ Thornton Creek—bacteria, dissolved oxygen, temperature	Standards for development to meet forested-condition targets only when the existing condition is forested.
Small lakes	▪ Bitter Lake ▪ Green Lake ▪ Haller Lake	(None listed by Ecology)	Flow control requirements for development over a certain size threshold.
Designated receiving waters	▪ Duwamish River ▪ Elliott Bay ▪ Puget Sound ▪ Portage Bay ▪ Union Bay ▪ Lake Union ▪ Lake Washington ▪ Lake Washington Ship Canal ▪ Other City-identified and Ecology-approved waters	▪ Duwamish River—ammonia, bacteria, benzenes, bioassay, dibenzofuran, dioxins, dissolved oxygen, metals, PAHs, pesticides, pH, phenols, plasticizers, rubberizers, temperature ▪ Puget Sound—bacteria, benzenes, dioxins, furans, metals, PAHs, PCBs, phenol ▪ Lake Union—metals, PAHs, PCBs, temperature ▪ Lake Washington—Bacteria, dioxins, metals, PAHs, PCBs, pesticides, phenol ▪ Lake Washington Ship Canal—bacteria, PAHs, PCBs, pesticides, metals, temperature	Determined to have sufficient capacity to receive discharges of rainwater runoff without flow control.

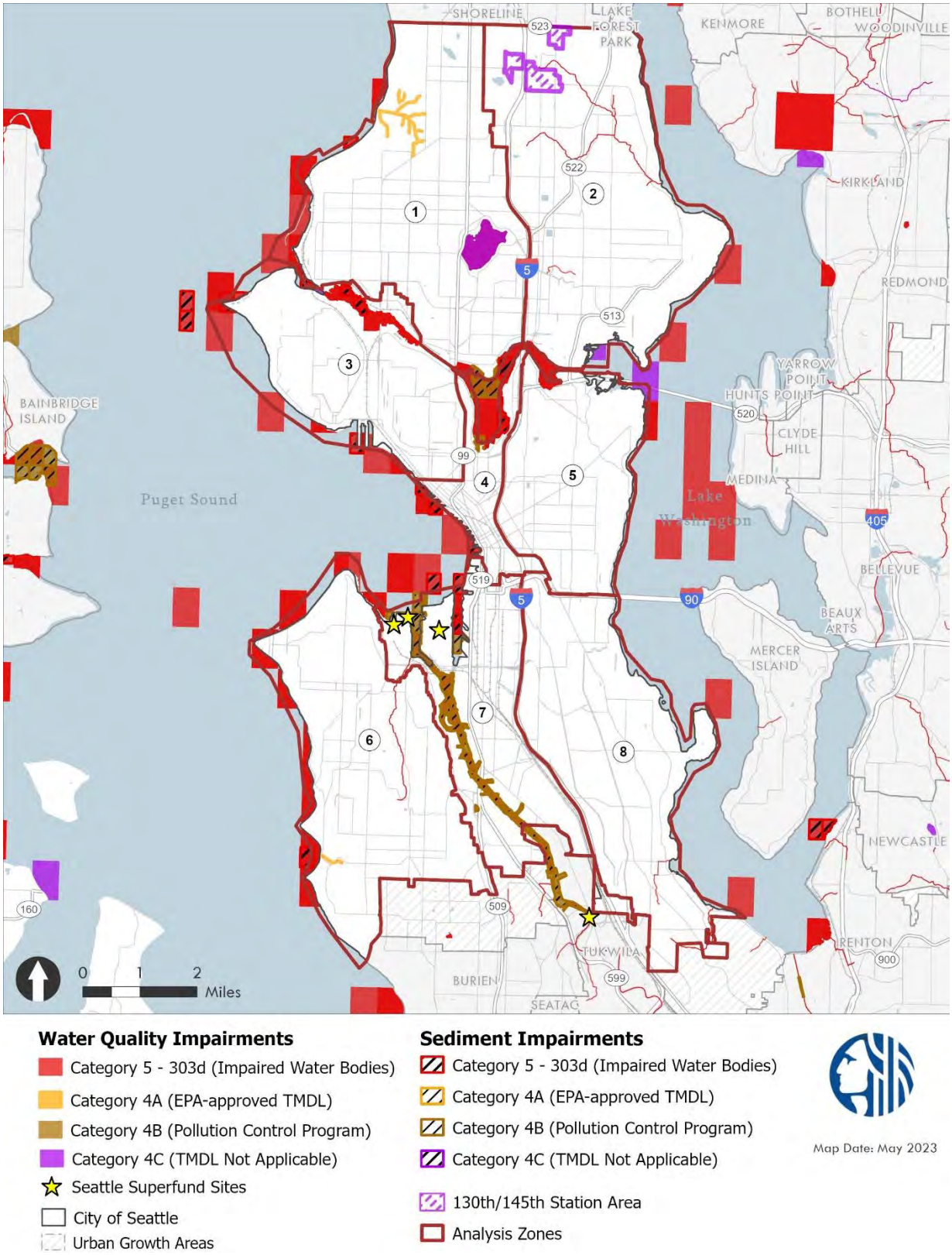
Notes: Metals include arsenic, cadmium, chromium, copper, lead, mercury, silver, and zinc; PAHs: polycyclic aromatic hydrocarbons; PCBs: polychlorinated biphenyls. Water quality treatment requirements are the same throughout the city regardless of the receiving water body.
Sources: Ecology, 2018; Seattle, 2021.

Exhibit 3.1-5. Water Resources



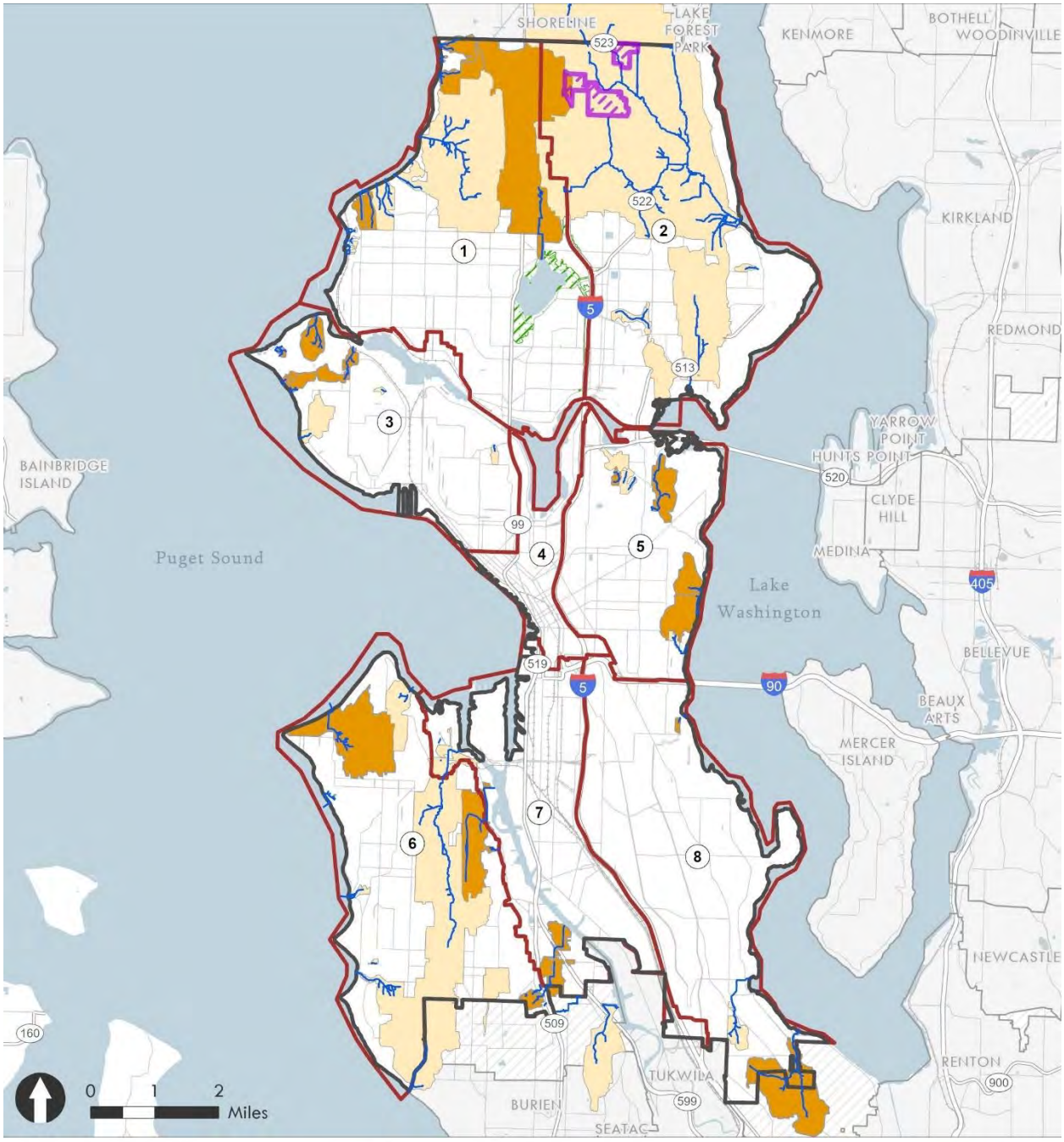
Source: Seattle, 2023a.

Exhibit 3.1-6. Impaired Water Bodies



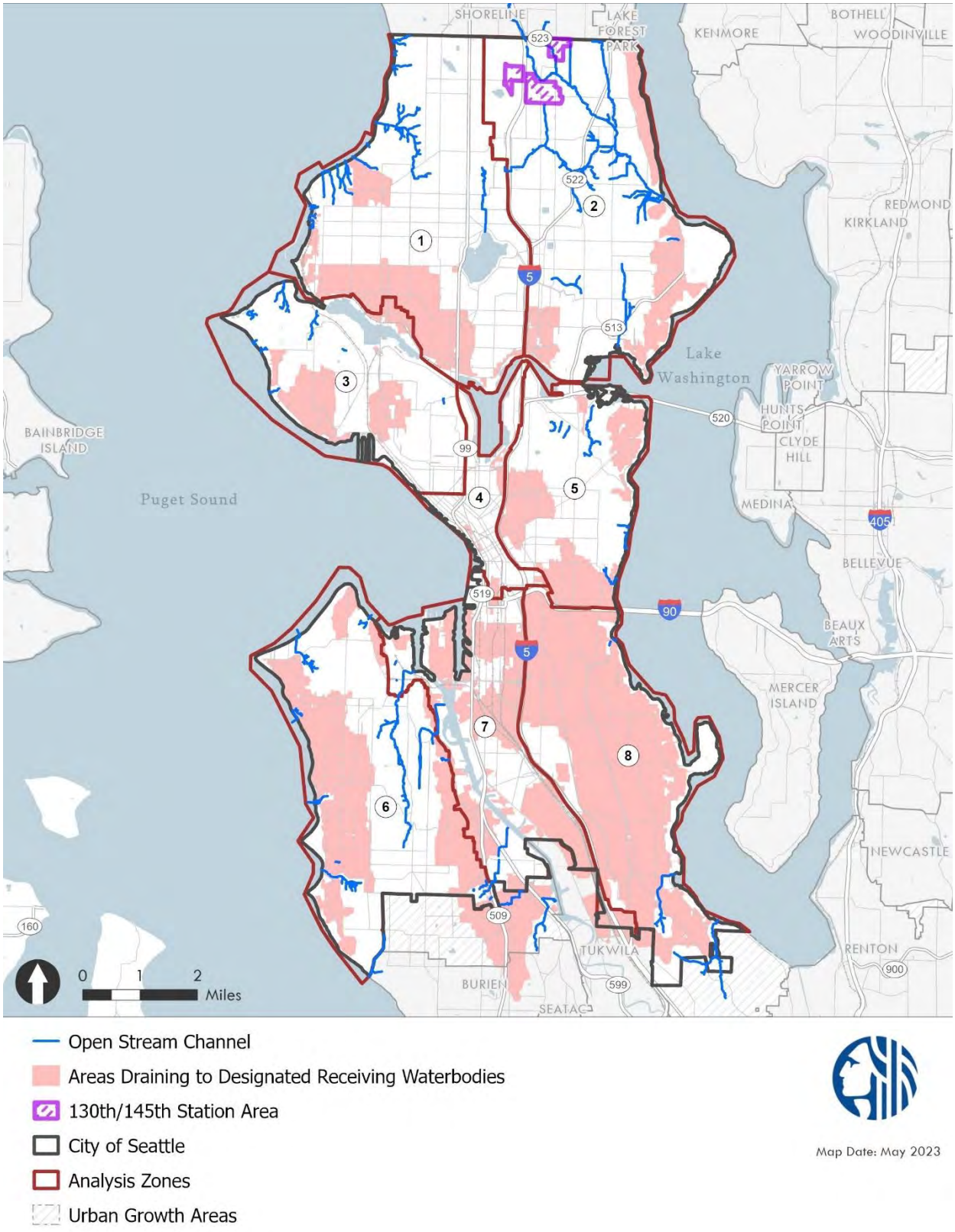
Source: Ecology, 2018; U.S. EPA, 2023.

Exhibit 3.1-7. Regulated Stream and Lake Watersheds



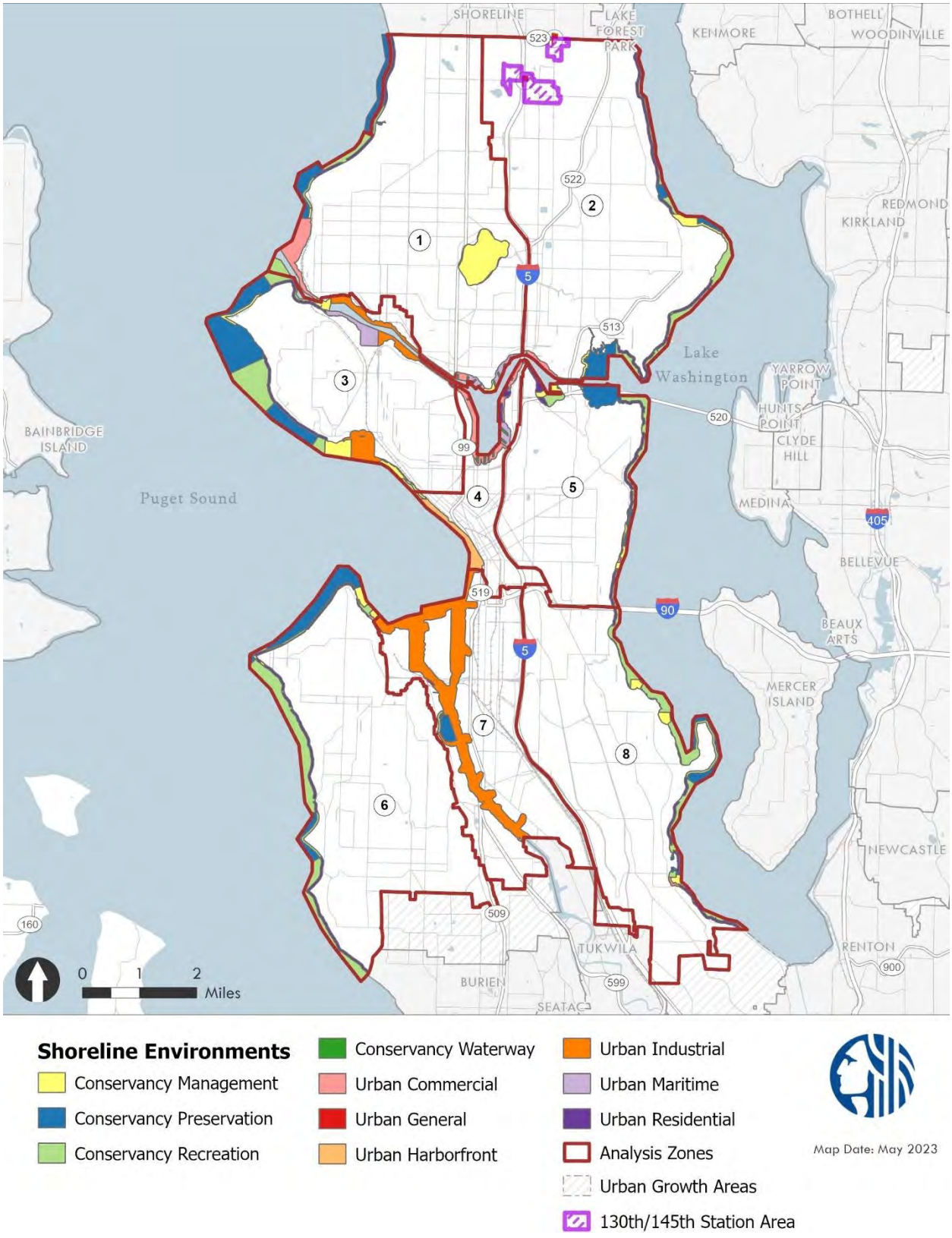
Source: Seattle, 2021.

Exhibit 3.1-8. Areas Draining to Receiving Waters Not Requiring Flow Control



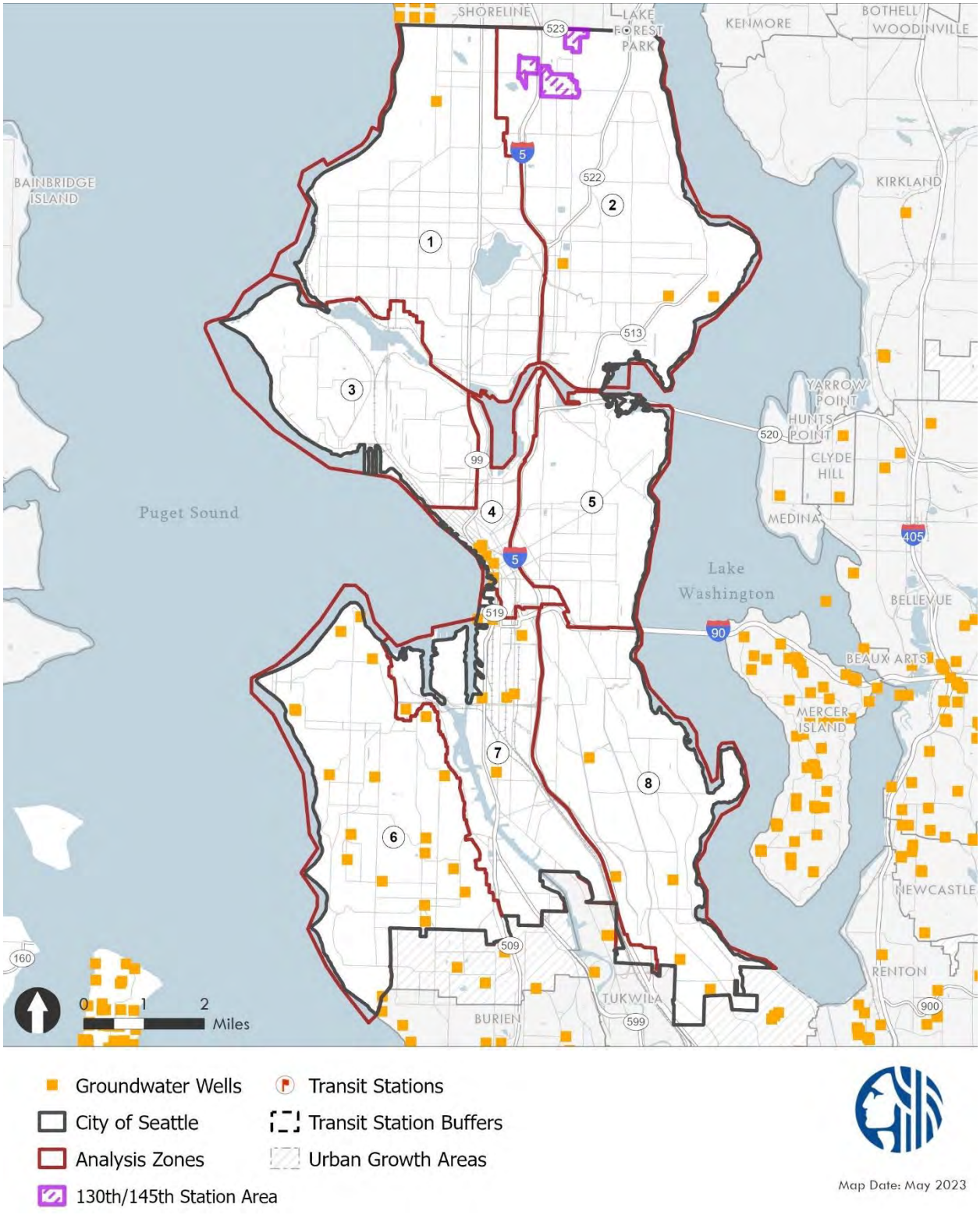
Source: Seattle, 2021.

Exhibit 3.1-9. Shoreline Areas



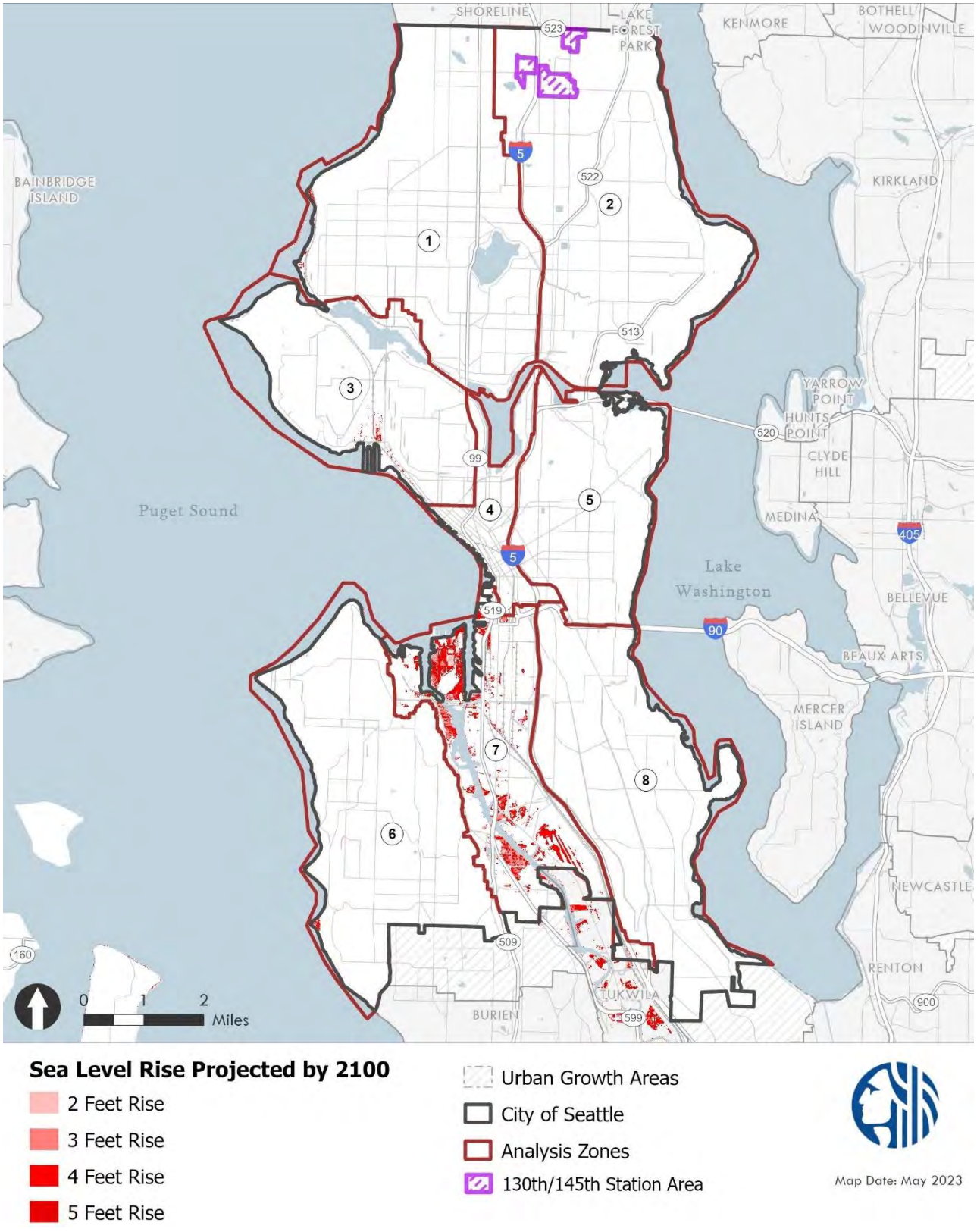
Source: Seattle, 2023a.

Exhibit 3.1-10. Groundwater Wells



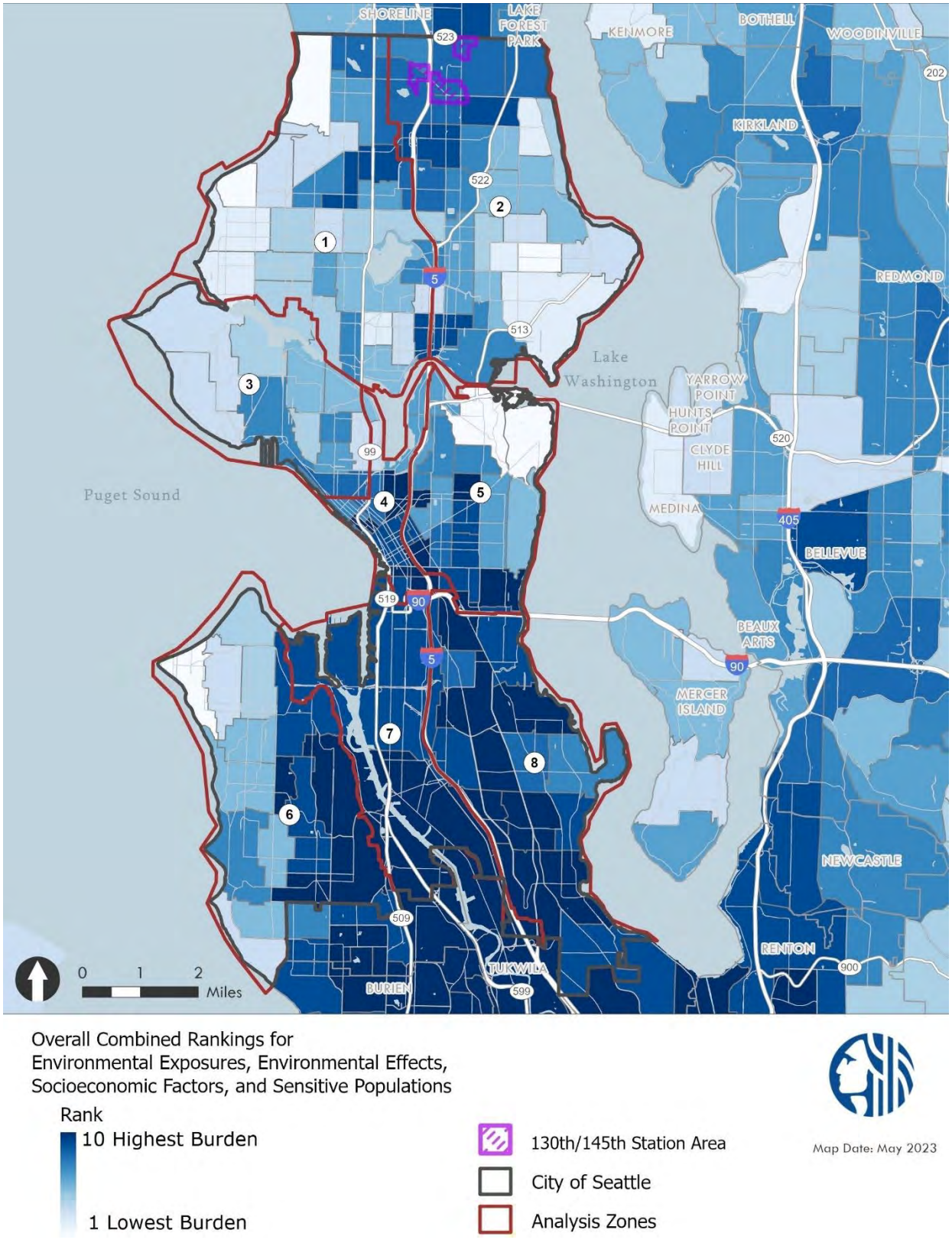
Sources: King County 2023b; Seattle, 2023a.

Exhibit 3.1-11. Forecasted Sea Level Rise



Source: NOAA, 2023; Seattle, 2023b.

Exhibit 3.1-12. Environmental Health Disparities



Source: WA DOH, 2023.

Analysis Areas

In addition to the citywide earth and water resources identified above, features unique to each area are identified in the following sections.

Area 1: NW Seattle

Key surface waters in and around Area 1 include:

- Blue Ridge Creek
- Broadview Creek
- Golden Gardens Creek
- Licton Springs Creek
- Piper's Creek
- Bitter Lake
- Green Lake
- Lake Union
- Lake Washington Ship Canal
- Puget Sound

Area 1 is the only area in the city with Category 1 peat settlement-prone areas, and also contains one of the largest areas of listed-creek watersheds in the city.

Area 2: NE Seattle

Key surface waters in and around Area 2 include:

- Thornton Creek
- Haller Lake
- Portage Bay
- Union Bay
- Lake Washington Ship Canal
- Lake Washington

Area 2 also contains more areas of Category 2 peat settlement-prone soils than any other area in the city.

130th/145th Study Area

The key surface water resource in and around 130th/145th Study Area is the north fork of Thornton Creek. The areas around the stream in the 130th/145th Study Area are classified as steep slopes, liquefaction-prone areas, and flood-prone areas.

Area 3: Queen Anne/Magnolia

Key surface waters in and around Area 3 include:

- Discovery Park Creek
- Kiwanis Ravine/Wolfe Creek
- Lake Washington Ship Canal
- Puget Sound

The center of Area 3 along the Interbay valley is categorized as liquefaction-prone. Also, Area 3 has the largest amount of Conservancy Preservation and Conservancy Recreation shoreline in the city.

Area 4: Downtown/Lake Union

Key surface waters in and around Area 4 include:

- Lake Union
- Lake Washington Ship Canal
- Elliott Bay

Area 4 is also the location of Downtown Seattle, the most densely developed area in the city.

Area 5: Capitol Hill/Central District

Key surface waters in and around Area 5 include:

- Frink Creek
- Madrona Park Creek
- Washington Park Creek
- Portage Bay
- Union Bay
- Lake Washington Ship Canal
- Lake Washington

Area 5 contains some of the largest areas of listed-creek watersheds in the city. In addition, Area 5 has the largest share of area mapped as not having been 40% impervious or more since 1985.

Area 6: West Seattle

Key surface waters in and around Area 6 include:

- Durham Creek
- Fauntleroy Creek
- Longfellow Creek
- Mee-Kwa-Mooks Creek
- Puget Creek
- Riverview Creek

- Schmitz Creek
- Elliott Bay
- Puget Sound

Area 6 contains some of the largest areas of listed-creek watersheds in the city.

Area 7: Duwamish

Key surface waters in and around Area 7 include:

- Duwamish River
- Elliott Bay

Topographically, the Duwamish River and Waterway corridor that makes up most of Area 7 is the flattest terrain in the city and almost all of it is classified as liquefaction-prone. Also, as shown in **Exhibit 3.1-11**, Area 7 is the most at-risk to effects from sea level rise out of any area in the city. This area has a long history of industrial use, the Duwamish River is identified as being impaired for more pollutants than any surface water in the city, and Area 7 contains 4 Superfund sites (the only area in the city to contain any). As shown in **Exhibit 3.1-12**, almost all census tracts in Area 7 are highly ranked (in the upper half of the range) for environmental health disparity.

Area 8: SE Seattle

Key surface waters in and around Area 8 include:

- Mount Baker Park Creek
- Taylor Creek
- Lake Washington

Area 8 has the largest amount of area draining to designated receiving waters (water bodies that are large enough to not be impacted by receiving runoff without flow control) in the city. Also, as shown in **Exhibit 3.1-12**, almost all census tracts in Area 8 are highly ranked (in the upper half of the range) for environmental health disparity.

3.1.2 Impacts

Impacts Common to All Alternatives

Direct

This section discusses impacts to earth and water resources that are common to all alternatives. It should be noted, though, that most impacts of future development projects on earth and water resources would be avoided or minimized through compliance with the City's Stormwater Code, Critical Areas Code, and other applicable regulations discussed in **Section 3.1.3**.

Big Picture Impacts

The comprehensive future planning associated with the plan alternatives would focus denser growth in the city's already developed urban area as opposed to allowing the same number of units to be dispersed more widely across ~~at same growth to impact more~~ rural, undeveloped areas ~~outside of the city~~in the region. This is expected to (1) lessen impacts to earth and water resources by providing housing units in smaller footprints, and (2) help prevent impacts to higher-quality rural earth and water resources throughout the region.

The impacts to earth and water resources common to all plan alternatives are:

- Construction impacts—Construction activities can involve removal of vegetation and soil disturbance, causing erosion, water quality impacts, and potential for soil contamination. Construction activities and associated rainfall runoff controls are required to meet permitting requirements that should prevent or minimize adverse impacts.
- Vehicle Use—All of the plan alternatives would result in increased vehicle use. Higher numbers of vehicle trips can potentially increase contamination of local receiving waters, depending on the level of stormwater runoff treatment provided to the roadways. Expected changes to single-occupancy vehicle trips are used as an indicator of potential increased pollution from vehicles. Increases in single-occupancy vehicle trips are presented in **Exhibit 3.1-13**, which is based on data from **Section 3.10 Transportation**.
- Hard Surfaces—All of the plan alternatives would result in an increase in the amount of hard surfaces (i.e., parking, buildings, etc., also known as impervious surfaces) in the city. The amount of hard surface versus vegetation in each place type impacts the way rainwater runoff mixes with potential pollution and soaks into the earth or is transported to natural receiving waters. Typically, areas with more hard surface and less vegetation produce greater impacts to earth and water resources. They increase runoff volumes, erode streams, increase stream temperatures, decrease groundwater recharge, and can increase flooding and habitat contamination. In places where some runoff does infiltrate into the ground, untreated stormwater that soaks into the earth could potentially contaminate groundwater. For the earth and water impacts analysis, factors that are used as gauges of increased hard surfaces are summarized in **Exhibit 3.1-13** and include number of housing units and their distribution of housing (new development is assumed to create more hard surfaces when it is spread into areas like Neighborhood Residential rather than concentrated into urban centers). Additional considerations of changes in land cover, including changes in vegetation, are discussed in **Section 3.3 Plants & Animals**.

Exhibit 3.1-13. Impacts Based on Expected Pollution and Runoff Increases

Metric	Alt. 1	Alt.2	Alt.3	Alt.4	Alt.5	Pref. Alt.
Pollution Indicator: Daily Single-Occupancy Vehicle Trips (millions)	1.78	1.85	1.85	1.85	**1.91**	**1.89**
Hard Surface Indicator: Housing Units	80,000	100,000	100,000	100,000	**120,000**	**120,000**
Hard Surface Indicator: ~~Share of~~ Distribution of Development~~able Acres~~						
Existing Centers* (continued development with no place type change)	~~58~~57%	58%	58%	58%	58%	36%
Plan Additions: Centers & Corridors** (hard surfaces are expected increase in these areas)	0%	6%	0%	15%	**20%**	**24%**
Neighborhood Residential** (hard surfaces are expected increase in these areas)	0%	0%	**29%**	0%	13%	**40%**
Outside Subareas*** (continued development with no place type change)	42%	36%	13%	27%	9%	0%****
Impact of Alternative Compared to No Action	**Baseline**	**Lowest Impact**	**~~Highest~~ High Impact**	**Moderate Impact**	**~~Highest~~ Higher Impact**	**Highest Impact**

Note: The Preferred Alternative was added to this exhibit since the Draft EIS—edits made to the row headings and Alternatives 1–5 are shown in tracks.
* "Existing Centers" are shown to clarify that these areas present in the Baseline will also be present in each plan alternative. They are not a differentiator between the baseline and plan alternatives.
** "Plan Additions: Centers and Corridors" and "Neighborhood Residential" are new elements that are part of the plan alternatives and are included in the impacts analysis.
*** "Outside Subareas" include~~s~~ all areas outside the other listed geographies and are typically parks, major institutions, and some residential areas. Alternatives 1-5 would not ~~No~~ change the ~~to~~ place type in ~~is proposed in~~ these areas, though growth in the residential areas ~~will~~ would continue ~~to occur~~ under current zoning throughout the 20-year planning period.
****See **Exhibit 2.4-26**. Under the Preferred Alternative, the same 3,854 acres of "Outside Subareas" as Alternatives 1-5 are technically classified as new place type—neighborhood center, urban neighborhood, or frequent transit corridor place types. This includes areas where residential development will not occur, such as parks and major institutions. The potential for and extent of development in these areas under the Preferred Alternative would be similar to Alternatives 1-5 as no substantial shift is expected from currently allowed development patterns.
Source: City of Seattle, 2024~~3~~; Parametrix, 2024; BERK, 2024~~3~~.

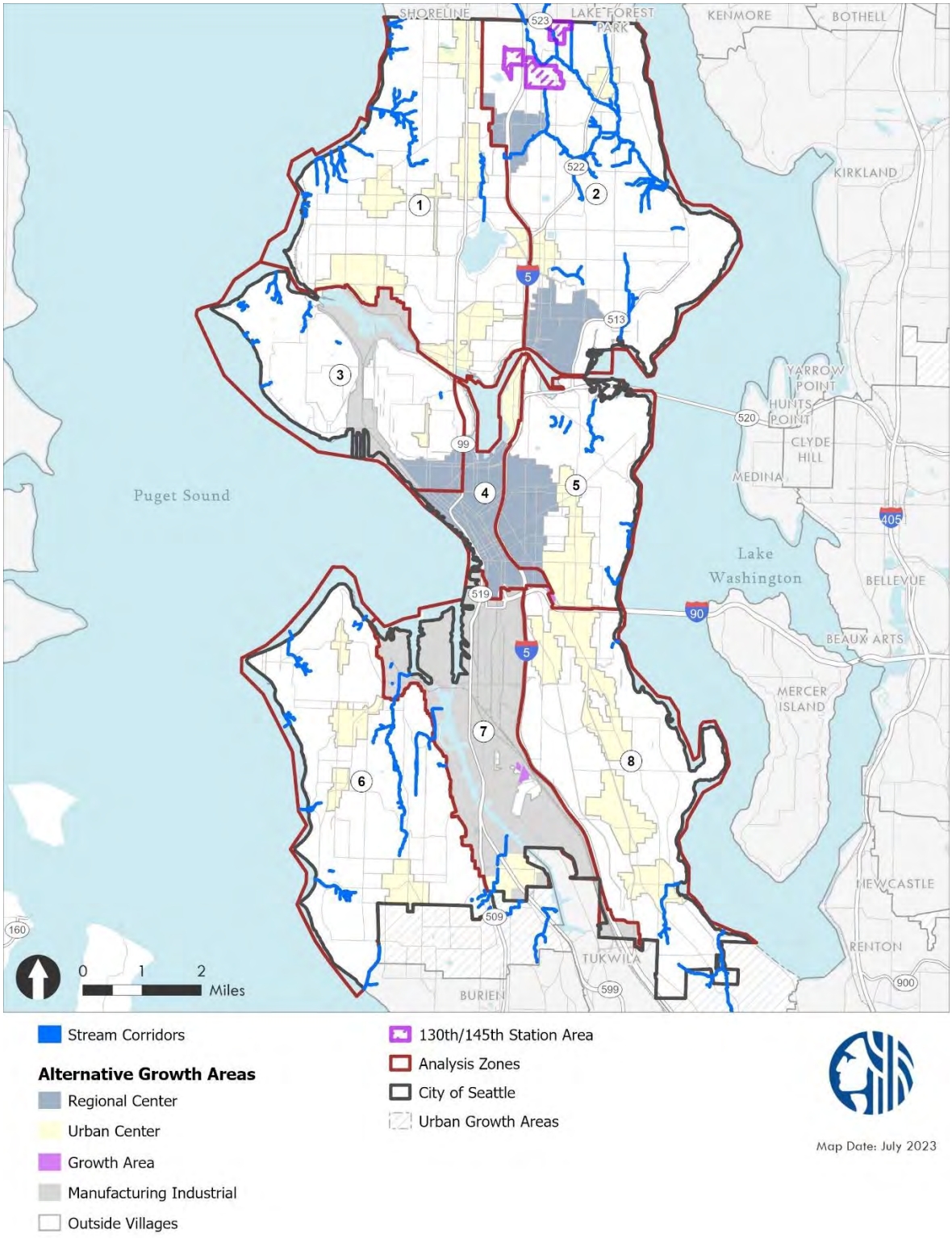
- Proximity to Water Resources—As discussed in **Section 3.1.1**, natural water resources (streams, lakes, and associated floodplains) exist throughout the city. Each of the plan alternatives could have increased impacts on these resources where development density is focused in closer proximity to these resources. The increased density associated with each alternative in proximity to water resources is shown in **Exhibit 3.1-14** ~~and~~, **Exhibit 3.1-15**, and **Exhibit 3.1-17**.However, development within and near these surface water resources is regulated and impacts would be mitigated under the applicable City codes, as discussed in **Section 3.1.3**.

In summary, every alternative would increase density in the city boundary and likely result in increased vehicle use, increased hard surfaces, and focus additional development closer to water resources. However, as mentioned above, the redevelopment associated with each plan alternative would comply with City codes requiring stormwater management, critical area protections, building upgrades, and other measures to avoid or minimize potential impacts to earth and water resources.

Indirect

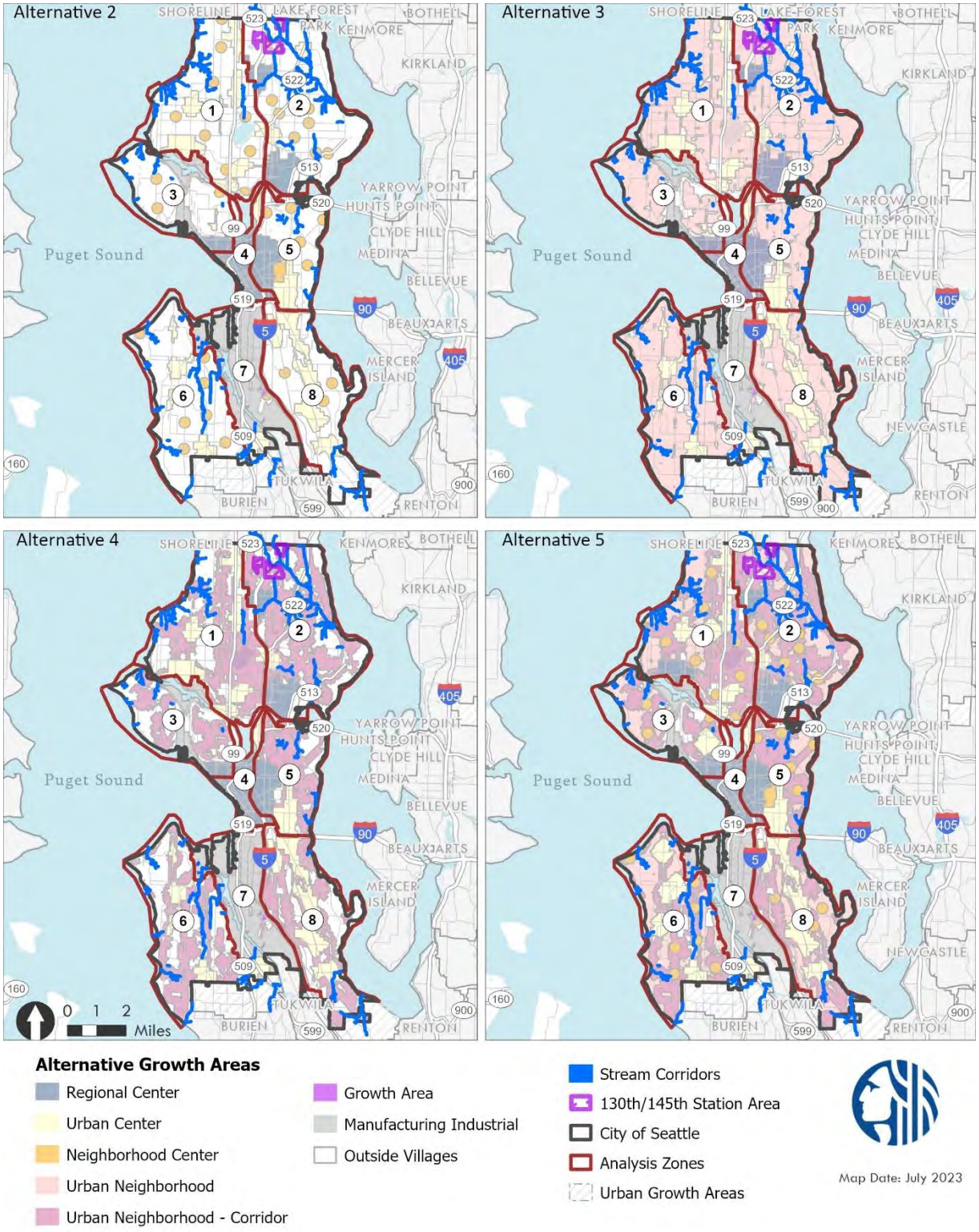
Indirect impacts potentially occur as a result of the proposed action and are reasonably foreseeable, but they occur later in time or farther removed in distance. Indirect impacts on earth and water resources generally come from each alternative's potential indirect changes to pollutant sources and land cover through changes to the pattern and locations of population density and growth rate. As outlined in Vision 2050 (PSRC, 2020), focusing growth in previously developed urban areas will result in less impact on regional earth and water resources than focusing the same growth in previously undeveloped areas outside of cities that add new impervious surfaces controlled under current standards. Expected changes to population density is presented in **Exhibit 3.1-14** ~~and~~, **Exhibit 3.1-15**, and **Exhibit 3.1-17**, which are based on data from **Section 3.10 Transportation**. Overall, the indirect effect from every alternative is considered beneficial to earth and water resources in the region that includes the city and areas beyond.

Exhibit 3.1-14. Proximity of Increased Density to Water Resources (Alternative 1, No Action)



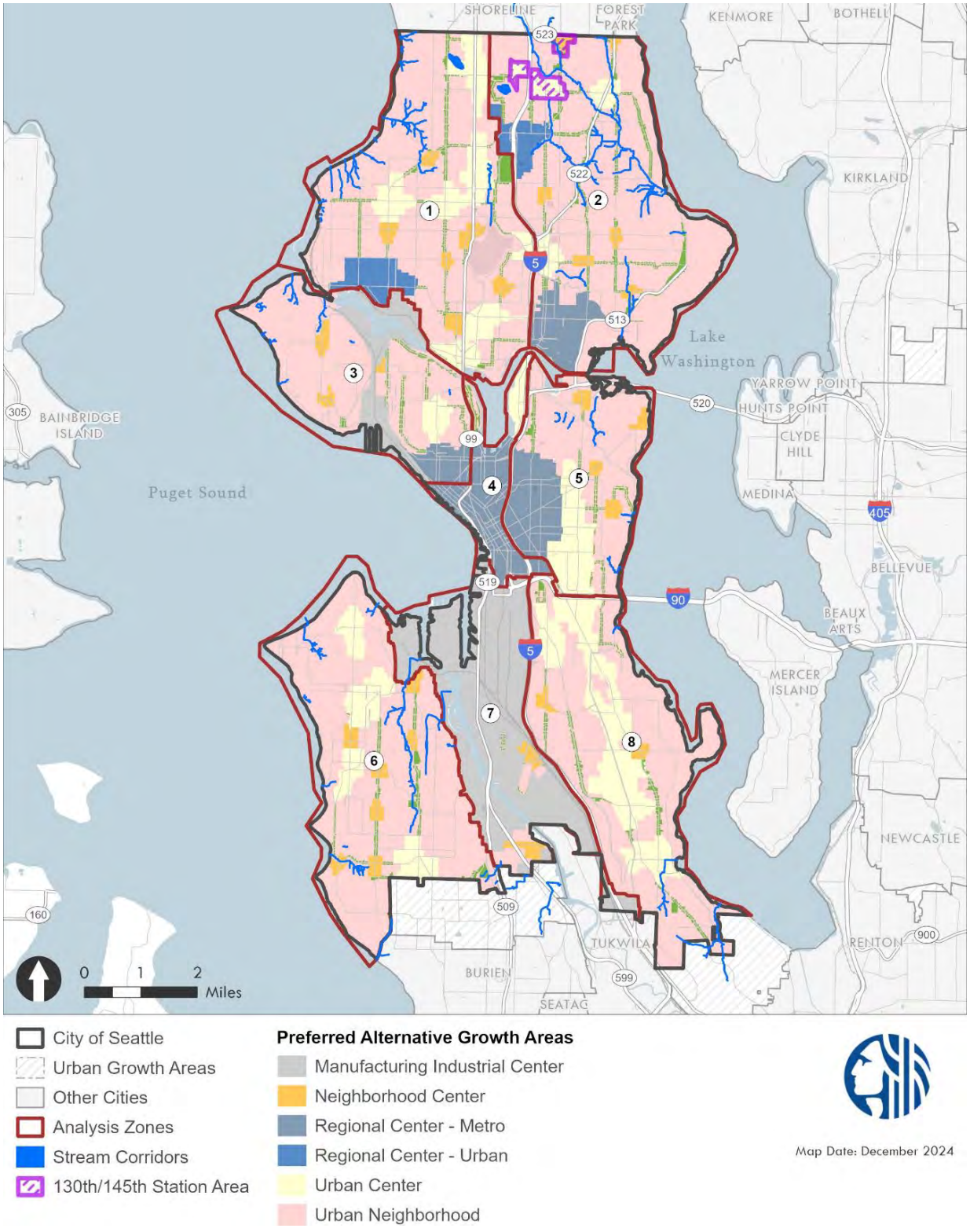
Note: See **Exhibit 2.1-1** in **Chapter 2** for a cross-walk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~A~~lternatives ~~2-5~~.
Source: Seattle, 2023a; BERK, 2023.

Exhibit 3.1-15. Proximity of Increased Density to Water Resources (Alternatives 2 through 5)



Note: See **Exhibit 2.1-1** in **Chapter 2** for a cross-walk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~lternatives 2–5~~.
Source: Seattle, 2023a; BERK, 2023.

Exhibit 3.1-16. Proximity of Increased Density to Water Resources (Preferred Alternative)



Note: No growth is assigned to public facilities under the Preferred Alternative (e.g., parks) even though they are shown as urban neighborhood on this map.
Source: City of Seattle, 2024; Parametrix, 2024; BERK, 2024.

Equity & Climate Vulnerability Considerations

As shown in **Exhibit 3.1-12**, several areas of the city rank high (in the upper half of the scoring range) for environmental health disparities. Redevelopment in these areas associated with the plan alternative could have both beneficial and detrimental impacts to the population in these areas, as follows:

- Water Quality: As discussed in the sections that follow, areas of a city that have been developed for decades in the past may not have rainwater runoff management that captures pollution or controls flow volumes to the maximum extent practicable. Redevelopment often triggers requirements to upgrade stormwater management to meet current standards, which can either avoid impacts or result in a benefit to earth and water resources, and in turn to those living in the surrounding community. Also, newer stormwater infrastructure can be designed to be more resilient to changes in rainfall frequencies and volumes, thereby lowering the flood risks for the community. As such, in cities like Seattle with landcover that has been historically developed for centuries, redevelopment that is focused in areas with underserved populations can sometimes help address environmental inequities related to water quality. Considering the pattern of density in **Exhibit 3.1-14** ~~and~~, **Exhibit 3.1-15**, **Exhibit 3.1-16**, and **Exhibit 3.1-17**, Alternative 1 would have the lowest level of redevelopment compared to Alternative 5 and the Preferred Alternative with the most and Alternatives 2 to 4 with medium amounts~~and Alternative 5 the most~~. If resources are directed equitably, it could reduce environmental inequities. However, as previously discussed and shown in **Exhibit 3.1-14** ~~and~~, **Exhibit 3.1-15**, and **Exhibit 3.1-17**, each of the plan alternatives could have increased environmental impacts where development density is focused in closer proximity to water resources.
- Exposure to Contaminated Sites: Populations living near historically contaminated sites can be at risk from environmental hazard exposure, and disturbance of the ground surface in these areas can sometimes increase the risk. However, larger redevelopment in these areas can trigger site remediation to either more safely contain the contaminants up to current standards or remove the contaminants to a designated hazardous waste disposal site. Therefore, redevelopment can sometimes pose a risk of exposure from contaminated sites or motivate additional clean-up and protection, depending on the scale of the project. The City regulates development around known contaminated sites, as discussed further in **Section 3.1.3**.
- Exposure to Flooding and Landslides: Where redevelopment would trigger installation of newer stormwater infrastructure as described above, that infrastructure can be designed to be more resilient to changes in rainfall frequencies and volumes, thereby lowering the flood risks for the community. In addition, as discussed in **Section 3.1.3**, the City regulates development in areas that are landslide-prone, steep slope erosion hazards, and liquefaction-prone. While Alternative 1 retains current plans and regulations, the action alternatives advance the City's climate resilience with a new climate element based on a climate vulnerability assessment.
- Future Affect by Sea-Level Rise: As discussed in **Section 3.1.3**, the City limits development in designated shoreline areas, which are areas most likely to be affected by sea-level rise.

However, the current codes are based on current water surface elevation metrics and may not fully address resiliency to potential impacts from forecasted sea-level rise. As shown in **Exhibit 3.1-11**, the area more likely to continue to see coastal flooding is in Area 7, which is primarily used and planned for industrial purposes and would potentially have similar growth under all alternatives. Other areas that may also be affected by sea-level rise ~~and~~ during storm surges include Ballard and Broadview (Area 1), Discovery Park and Lower Queen Anne (Area 3), Downtown (Area 4), and West Seattle (Area 6). Growth levels are similar in Downtown (Area 4) across alternatives but tend to be lower in Alternative 1 compared to Alternative 5 and the Preferred Alternative with the most and Alternatives 2 to 4 with medium amounts~~and higher in Alternative 5~~ in other areas. Depending on the location of growth, Alternative 5 and the Preferred Alternative could result in exposure of more people to sea level rise impacts during storm surges. Compared to Alternative 1, No Action, the action alternatives would potentially have less risk of sea level rise exposure to communities because of the new climate element required under the Growth Management Act (GMA) and climate resilience strategies included to direct growth away from shorelines.

Impacts of Alternative 1: No Action

Alternative 1 represents the No Action baseline against which all other alternatives are compared. It would allow a continuation of growth of 80,000 dwellings and 158,000 jobs on redevelopable and vacant lands, with most residential growth directed to urban centers and villages considering current place types. Alternative 1, No Action, would have the lowest potential land cover conversions of vegetation to hard surface, the lowest expected increase in daily vehicle trips, lowest potential to locate growth in sea level rise hazard areas and would focus increased density farther away from water resources than all other alternatives. It would emphasize place types that have benefits; however, its lower amount of new housing in the city compared to the other plan alternatives could result in housing growth in the region beyond the city. This could indirectly result in adverse impacts to more pristine water resources throughout the region, as described under **Impacts Common to All Alternatives**.

130th/145th Station Area

The 130th/145th Station Area is in close proximity to Thornton Creek, and runoff from these areas is in the associated regulated stream basin. For the reasons described above, Alternative 1, No Action, presents the lowest potential for direct impacts on earth and water resources within the 130th/145th Station Area.

Impacts of Alternative 2: Focused

Alternative 2 would have the least potential land cover conversions of vegetation to hard surface, the lowest expected increase in daily vehicle trips, and would focus increased density farther

away from water resources than all other action alternatives. Therefore, Alternative 2 is expected to have the lowest potential for direct impacts to earth and water among the alternatives.

For sea level rise, Alternative 2 has a moderate potential to locate growth in sea level rise hazard areas outside of Area 7. In Area 3, its growth is similar to that of Alternative 5 and depending on growth location near shorelines could have a similar risk as Alternative 5 in that area.

Alternative 2 (along with Alternatives 3 and 4) offers a lower amount of new housing in the city among the action alternatives and could result in housing growth in the region beyond the city. Based on this, Alternative 2 could indirectly result in adverse impacts to some of the more pristine water resources throughout the region, as described under Impacts Common to All Alternatives.

130th/145th Station Area

The 130th/145th Station Area is in close proximity to Thornton Creek, and runoff from these areas is in the associated regulated stream basin. ~~For the reasons described above, Alternative 2 presents the lowest potential for direct impacts on earth and water resources w~~Within the 130th/145th Station Area, potential development would be similar among the action alternatives, and they would each have higher expected direct impacts to earth and water resources compared to Alternative 1.

Impacts of Alternative 3: Broad

Alternative 3 would have ~~the highest~~higher potential land cover conversions of vegetation to hard surface, moderate~~high~~ expected increase in daily vehicle trips, and would focus a higher amount of increased density closer to water resources than other action alternatives. Therefore, (along with Alternative 5) Alternative 3 is expected to have ~~the highest~~higher potential for direct impacts to earth and water among the alternatives.

For sea level rise, Alternative 3 has a moderate risk of growth in sea level rise hazard areas in Areas outside of Area 7.

Also, Alternative 3 (along with Alternatives 2 and 4) offers a lower amount of new housing in the city among the action alternatives and could result in housing growth in the region beyond the city. Based on this, Alternative 3 could indirectly result in adverse impacts to some of the more pristine water resources throughout the region, as described under **Impacts Common to All Alternatives**.

130th/145th Station Area

A station area plan would not be implemented under Alternative 3; designations and zoning would match the overall intent of Alternative 3 for more growth spread to urban neighborhoods.

Impacts of Alternative 4: Corridor

Alternative 4 would have ~~the~~ moderate potential land cover conversions of vegetation to hard surface, ~~high~~ moderate expected increase in daily vehicle trips, and would focus some increased density closer to water resources compared to the baseline. Therefore, Alternative 4 is expected to have ~~the~~ moderate potential for direct impacts to earth and water among the alternatives.

Like Alternative 3, there is a moderate risk of added growth from Alternative 4 in areas that may have a long-term potential risk of exposure to sea level rise.

Also, Alternative 3 (along with Alternatives 2 and 4) offers a lower amount of new housing in the city among the action alternatives and could result in housing growth in the region beyond the city. Based on this, Alternative 3 could indirectly result in adverse impacts to some of the more pristine water resources throughout the region, as described under **Impacts Common to All Alternatives**.

130th/145th Station Area

A station area plan would not be implemented under Alternative 4; designations and zoning would match the overall intent of Alternative 4 for more growth spread to corridors.

Impacts of Alternative 5: Combined

Alternative 5 would have higher potential land cover conversions of vegetation to hard surface, ~~the highest~~high expected increase in daily vehicle trips, and would focus a ~~the highest~~higher amount of increased density closer to water resources than all other action alternatives. Therefore, (along with Alternative 3) Alternative 5 is expected to have ~~the highest~~higher potential for direct impacts to earth and water among the alternatives.

Alternative 5 may expose more populations to sea level rise with storm surges, depending on the location of housing.

~~Among all of the alternatives, however,~~ However, Alternative 5 offers ~~the highest~~a higher amount of new housing in the city, which would deter housing growth in the region beyond the city. Based on this, Alternative 5 could indirectly avoid adverse impacts to some of the more pristine water resources throughout the region, as described under **Impacts Common to All Alternatives**.

130th/145th Station Area

The 130th/145th Station Area is in close proximity to Thornton Creek, and runoff from these areas is in the associated regulated stream basin. ~~For the reasons described above, Alternative 5 presents the highest potential for direct impacts on earth and water resources w~~Within the 130th/145th Station Area ~~among the action alternatives.~~, potential development

would be similar among the action alternatives, and they would each have higher expected direct impacts to earth and water resources compared to Alternative 1.

Impacts of Preferred Alternative

Note: The impacts analysis for the Preferred Alternative was added since the Draft EIS.

The Preferred Alternative would have the highest potential land cover conversions of vegetation to hard surface, high expected increase in daily vehicle trips, and would focus the highest amount of increased density closer to water resources. Therefore, the Preferred Alternative is expected to have the highest potential for direct impacts to earth and water among the alternatives.

Depending on the location of growth, the Preferred Alternative may expose more populations to sea level rise during storm surges.

Among all of the alternatives, however, the Preferred Alternative (along with Alternative 5) offers a higher amount of new housing in the city, which would deter housing growth in the region beyond the city. Based on this, the Preferred Alternative could indirectly avoid adverse impacts to some of the more pristine water resources throughout the region, as described under **Impacts Common to All Alternatives**.

130th/145th Station Area

The 130th/145th Station Area is in close proximity to Thornton Creek, and runoff from these areas is in the associated regulated stream basin. Within the 130th/145th Station Area, potential development would be similar among the action alternatives, and they would each have higher expected direct impacts to earth and water resources compared to Alternative 1.

3.1.3 Mitigation Measures

Incorporated Plan Features

None of the alternatives described in **Chapter 2** of this EIS include plan features that explicitly address earth and water resources. However, the Comprehensive Plan includes policies relevant to the city-wide protection and restoration of earth and water resources in the following sections:

- Growth Strategy—Natural Environment
- Land Use—General Development Standards
- Land Use—Environmentally Critical Areas
- Capital Facilities—Operations and Maintenance
- Utilities—Resource Management

- Utilities—Facility Siting and Design
- Environment—Land
- Environment—Water
- Environment—Climate

~~A~~The action alternatives would amend all elements as part of the Periodic Update; this includes similar and improved policies addressing earth and water resources. The Draft One Seattle Plan includes a new climate element required under the Growth Management Act (GMA). It will include greenhouse gas reduction policies and climate resilience policies to avoid and adapt to climate risks including sea level rise, flooding, and risks of landslides due to extreme precipitation based on the Seattle Climate Vulnerability Assessment 2023.

Regulations & Commitments

Most impacts on earth and water resources from future development projects associated with the alternatives would be avoided or minimized through compliance with the City's Stormwater Code, Critical Areas Code, and other applicable regulations such as those listed below.

Federal

- Clean Water Act, 33 United States Code (USC) 1251 et seq., including Sections 401—Water Quality Certification, 402—National Pollutant Discharge Elimination System, and 404—Permits for Dredge or Fill
- Coastal Zone Management Act, 16 USC 1451 et seq.
- Section 14 of the Rivers and Harbors Act of 1899, 33 USC 408 (Section 408)
- National Flood Insurance Act of 1968 and Flood Disaster Protection Act of 1973, 42 USC 4001 et seq.
- Floodplain Management Presidential Executive Order 11988
- Endangered Species Act (ESA) Biological Opinion for the Implementation of the National Flood Insurance Program in the State of Washington (National Marine Fisheries Service 2008)
- Safe Drinking Water Act, 42 USC 300 et seq., Chapter 6A

State & Regional

- Water Quality Standards for Surface Waters, Washington Administrative Code (WAC) 173201A
- Water Quality Standards for Groundwater, WAC 173-200
- Flood Control Management Act, Revised Code of Washington (RCW) 86
- Water Pollution Control Act, RCW 90.48
- Shoreline Management Act, RCW 90.58, WAC 173-26
- National Pollutant Discharge Elimination System (NPDES) Construction Stormwater General Permit (Washington State Department of Ecology [Ecology], 2021)

- National Pollutant Discharge Elimination System (NPDES) Western Washington Phase I Municipal Stormwater General Permit (Ecology, 2019b)
- Stormwater Management Manual for Western Washington (Ecology Manual) (Ecology, 2019a)
- Washington State Department of Transportation (WSDOT) Highway Runoff Manual (WSDOT, 2019a)
- WSDOT Hydraulics Manual (WSDOT, 2019b)
- Washington State Hydraulic Code, WAC 220-660

City of Seattle

The City is subject to the state regulations described above. In addition, the City has also enacted several local regulations that govern water quality in the study area, which are described below.

Stormwater Code and Manual—SMC Title 22, Subtitle VIII (22.800 to 22.808)

To support implementation of the City's Stormwater Code and other applicable regulations, the Director of Seattle Public Utilities (SPU) and the Director of the Department of Planning and Development have promulgated rules that provide approved technical methodology, criteria, guidelines, and additional information pursuant to the Stormwater Code authority. Currently, there are four of these joint "Directors' Rules" covering source control, construction stormwater control, stormwater flow control and water quality treatment, and stormwater code enforcement. The City's Stormwater Manual is a compilation of the Directors' Rules (Seattle, 2021); as such, it describes guidance for complying with the Seattle Stormwater Code. Key aspects of the Stormwater Code and manual that may be applicable to the alternatives are summarized in the following sections.

- **Construction.** All projects that have ground-disturbing activity must develop and submit a Construction Stormwater Control and Soil Management Plan. The plan must outline how the project will apply BMPs in 18 specified categories identified in the manual to minimize project impacts, protect the public drainage system and receiving waters, prevent erosion and sedimentation, and manage pollution-generating activities and sources. The requirements of this plan are similar to those of the construction stormwater pollution prevention plan required under Ecology's NPDES Construction Stormwater General Permit provisions; the City-required plan can be modified to meet the NPDES requirements.
- **Development.** Development projects that disturb certain ground area thresholds are required to install permanent stormwater management systems to mitigate potential impacts from changes to the site runoff. These required stormwater management measures are designed to minimize pollution at the source, remove or reduce the amounts of pollutants in the stormwater before it enters the receiving water, or manage the rate at which stormwater flows into a receiving water, the separated storm system, or the combined sewer system. Most development associated with the plan alternatives would likely require on-site (within the developed parcel) stormwater management (where

determined feasible based on the project design), which includes controls like infiltration trenches, rain gardens, or permeable pavements. However, the plan alternatives would likely not include development that would trigger flow control facilities (like stormwater ponds or vaults) or water quality treatment facilities (like media filtration facilities). These Stormwater Manual requirements are summarized in **Exhibit 3.1-17**.

Exhibit 3.1-17. Seattle Stormwater Manual—Requirement Summary

Project Type[1]	Soil Amendment	On-site Stormwater Management	Flow Control and Water Quality Treatment
Single-Family Residential (SMC 22.805.030) Trail and Sidewalk (SMC 22.805.040) Parcel-Based (SMC 22.805.050)	Retain and protect undisturbed soil; and amend all disturbed or compacted soil with organic matter.	For projects where either the total new plus replaced hard surface is generally at least **1,500 square feet** (**750 square feet** for lots created in 2016 or after; **2,000 square feet** for trail and sidewalk) or the land disturbing activity is **7,000 square feet** or more.	Not required
Roadway (SMC 22.805.060)	Retain and protect undisturbed soil; and amend all disturbed or compacted soil with organic matter.	For **2,000 square feet** or more of new plus replaced hard surface or **7,000 square feet** or more of land disturbing activity.	Flow control is typically required for projects that change **5,000 square feet** or more of hard surfaces (plus other thresholds) that discharge to wetlands, creek basins, small lakes, or a capacity-constrained system. Water quality required for projects not discharging to the public combined sewer that generally change **5,000 square feet** or more of hard surfaces (plus other thresholds).

Notes: 1. Project types are shown for comparison. Single-family residential, sidewalk, and other parcel-based projects are those most likely to be associated with the alternatives. Roadway changes are not expected to be included in most of the development projects. Other project types may apply.
Source: Seattle, 2021.

Shoreline Master Program—SMC 23.60A.

The City prohibits any development in designated shoreline areas (see **Exhibit 3.1-9**) without a review by the City that the development is consistent with the Seattle Shoreline Master Program outlined in SMC23.60A. The restrictions apply even if no shoreline substantial development permit is required. Most of the boundaries and elevation restrictions in the Shoreline Master Program are based on the Ordinary High-Water Mark (the highest mark on the bank of a water body that presents scientific features of the regular presence of water).

Critical Areas Ordinance—SMC 25.09.

The City prohibits any development in critical land areas (see **Exhibit 3.1-2**) without a review by the City that the development is consistent with the Critical Areas Ordinance outlined in SMC 25.09. In most cases, the types of activities that may be included as part of development in critical areas are restricted. Also, certain engineering, geotechnical, biological, or other scientific studies are often required before beginning work to determine areas that may require heightened protections, potential risks to areas deemed suitable for development, and

appropriate mitigation measures. In addition, often when work is allowed it is restricted to certain portions of the critical area behind designated buffers. Subsections of the Critical Area Code pertain to the following protected and specially regulated lands:

- SMC 25.09.080—Landslide-Prone Areas
- SMC 25.09.090—Steep Slope Erosion Hazard Areas
- SMC 25.09.100—Liquefaction-Prone Areas
- SMC 25.09.110—Peat Settlement-Prone Areas
- SMC 25.09.160—Wetlands and Wetland Buffers
- SMC 25.09.200—Fish and Wildlife Habitat Conservation Areas
- SMC 25.09.220—Abandoned Landfills

~~Through compliance with the Critical Areas Ordinance, it is expected that potential risk of impacts to the above types of protected and specially regulated lands would be minimized or avoided.~~

Emergency Preparedness for Earthquakes & Other Events

- Seattle Building Code provides minimum requirements regarding emergency preparedness for design and construction of new buildings. Seattle has adopted the 2021 International Building Code, with amendments effective as of November 15, 2024.
- Seattle Resolution 32033 establishes a framework for a phased-in mandatory retrofit ordinance for Seattle's 1,100 unreinforced masonry buildings (URMs).
- Seattle Resolution 32111 directs SDCI to use the Draft URM Retrofit Technical Standard to inform voluntary URM retrofit legislation.
- Seattle has a suite of plans updated regularly by the Office of Emergency Management. Currently, the City has published Seattle 2024-2026 Citywide Emergency Management Program Strategic Plan. The City also maintains Emergency Management Accreditation Program certification.
- City of Seattle, 2021-2026 All-Hazards Mitigation Plan
- Seattle-King County Public Health preparedness and response plans.

Other Potential Mitigation Measures

The following mitigation measures are not part of the alternatives but are recommended for consideration by the City. These measures would help to further address existing impacts on earth and water resources associated with overall urban development in Seattle.

- Continued implementation of SDOT policy to avoid adding or expanding roadways through transit and other approaches.
- Strengthen critical areas ordinances and restore critical area buffers.
- Update the Shoreline Master Program to increase sea-level rise resiliency actions (such as construction of barriers or property acquisitions) by basing boundaries and elevation

restrictions on the Mean Higher High Water Mark (the average of the higher daily tides) or some other metric higher than the Ordinary High Water Mark.

- Install updated stormwater controls on roadways, which are not likely to be upgraded as part of the parcel redevelopments included in the alternatives.
- Continue research and implementation of innovative stormwater best management practices, especially those focused water quality treatment in the most urban areas.
- Implement the Puget Sound Partnership Action Agenda and Water Resource Inventory Area Salmon Recovery/Habitat Protection plans.
- Continue to implement PSRC's Four-Part Strategy to reduce greenhouse gas emissions.
- Implement the One Seattle Climate & Environment Element. Regarding overall Comprehensive Plan and Climate & Environment Element implementation, the City will develop a progress report by 2029 (RCW 36.70A.130(9).
- Evaluate and implement Climate Resilience Opportunities in the Seattle Climate Vulnerability Assessment, July 2023.
- Complete and implement Citywide Resilience Hub Plan.
- Complete and implement Floodplain Development Regulations Update which includes regulations to increase the elevation for construction from 2-feet to 3-feet above base flood elevation to account for sea level rise.
- Update 2013 Climate Action Plan, scheduled for mid-2026.
- Update Hazard Mitigation Plan every 6 years.

3.1.4 Significant Unavoidable Adverse Impacts

As discussed in **Section 3.1.1**, landcover across most of the city has been extensively modified for over a century by development, which has already resulted in long-term impacts to earth and water resources. Redevelopment of these areas associated with every ~~project~~ alternative would be required to install permanent stormwater management systems to mitigate potential impacts from changes to the site runoff. These required stormwater management measures are designed to minimize pollution at the source; remove or reduce the amounts of pollutants in the stormwater before it enters the receiving water; or manage the rate at which stormwater flows into a receiving water, the separated storm conveyance system, or the combined sewer system. Furthermore, the comprehensive future planning associated with the ~~project~~ alternatives that would focus growth in the city's already developed area as opposed to allowing that same growth to impact more rural, undeveloped areas is also expected to be beneficial to earth and water resources. Therefore, no significant unavoidable adverse impacts to earth and water resources are expected.

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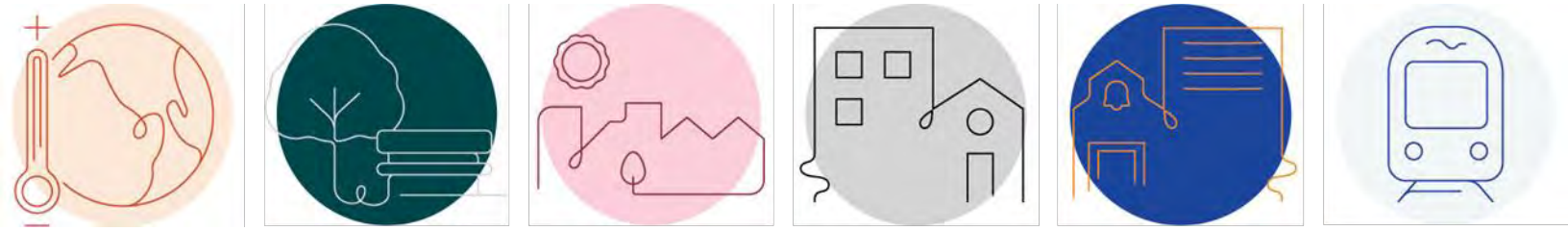
3.2 Air Quality & GHG Emissions



Source: City of Seattle, 2023.

This section evaluates the air quality impacts of implementing the alternatives considered in this EIS. The analysis focuses on two criteria air pollutants: carbon monoxide (CO) and particulate matter (PM) resulting from changes in land uses and transportation patterns. It also considers other criteria air pollutants such as ozone precursors (reactive organic gases, ROGs, and oxides of nitrogen, NOx) and Toxic Air Pollutants (TAPs).

This EIS examines potential air quality issues at a regional level. This analysis evaluates air quality and potential impacts on a citywide cumulative basis and, where appropriate, according to the EIS analysis areas. Transportation sources (fossil-fueled cars, trucks, trains, buses, etc.) can contribute to heightened localized concentrations of certain air pollutants. Therefore, for TAPs and fine particulate matter ($PM_{2.5}$), localized analyses are provided to the degree feasible to identify potential public health impacts from locating new "sensitive receptors" (such as residences) near to substantial sources of these pollutants within transportation corridor areas.

This section also provides an analysis of how implementation of the alternatives evaluated may contribute to global climate change through the emission of greenhouse gases (GHGs). Transportation systems contribute to climate change primarily through the emissions of certain greenhouse gases (CO_2, CH_4 and N_2O) from the combustion of nonrenewable energy sources (primarily gasoline and diesel fuels) used to operate passenger, commercial, and transit vehicles. Land use changes contribute to climate change through construction and operational use of electricity and natural gas, water, and waste production.

Consistent with the above descriptions, the thresholds of significance utilized in this impact analysis include:

- Air Pollution: Growth concentrated in areas with high exposure to air pollution.
- Per Capita GHG emissions: Increase in GHG emissions on a per capita basis.
- Consistency with other efforts: Actions would prevent or deter statewide, regional, or local efforts to reduce GHG emissions.

Data & Methods

The project team collected data from the following sources to support analysis of existing air quality conditions and potential effects of the ~~project~~ alternatives:

- U.S. Environmental Protection Agency Greenbook (EPA, 2021)
- Puget Sound Clean Air Agency (PSCAA) and Ecology Air Monitoring Network
- 2016-2021 PSCAA Air Quality Data Summaries (PSCAA)
- 2020 Community Greenhouse Gas Emissions Inventory (Seattle, 2022)
- Washington Department of Ecology Air Quality Standards and Greenhouse Gas Emissions Inventory (Ecology, 2022a and 2022b)

3.2.1 Affected Environment

Current Policy & Regulations

Air quality in the Puget Sound region including Seattle, is regulated and enforced by federal, state, and local agencies including the Environmental Protection Agency (EPA), Washington State Department of Ecology (Ecology), and the Puget Sound Clean Air Agency (PSCAA). Each of these agencies has their own role in air quality regulation and monitoring.

U.S. Environmental Protection Agency

The Clean Air Act, established in 1970 and amended in 1977 and 1990, was created to protect human health and the environment from air pollutants. The Clean Air Act required the EPA to establish National Ambient Air Quality Standards (NAAQS) to limit common and widespread pollutants. The six criteria pollutants are: carbon monoxide (CO), lead (Pb), nitrogen dioxide (NO_2), ozone (O_3), particulate matter (PM), and sulfur dioxide (SO_2). Particle pollution is differentiated based on the size of particulate matter; permissible levels of both PM_{10} (particles equal to or less than 10 microns in diameter) and $PM_{2.5}$ (particles that are less than or equal to 2.5 microns in diameter) have been established as part of the NAAQS.

These NAAQS are monitored according to primary and secondary standards. Primary standards relate to the effect on sensitive populations such as children, the elderly, or those with respiratory or other health conditions, while secondary standards relate to the public welfare, such as damage to crops, vegetation, and buildings. Standards are periodically reviewed and revised, with the most recent national standards listed in **Exhibit 3.2-1** below.

Exhibit 3.2-1. National Ambient Air Quality Standards

Pollutant	Primary/ Secondary	Averaging Time	Level	Measurement Criteria
Carbon Monoxide (CO)	Primary	8 Hours	9 ppm (10.31 mg/m³)	Not to be exceeded more than once per year
		1 Hour	35 ppm (40.08 mg/m³)	
Lead (Pb)	Primary and Secondary	Rolling 3-Month Average	0.15 µg/ m³	Not to be exceeded
Nitrogen Dioxide (NO_2)	Primary	1 Hour	100 ppb (188.10 µg/m³)	98th percentile of 1-hour daily maximum concentrations, averaged over 3 years
	Primary and Secondary	1 Year	53 ppb (99.69 µg/m³)	Annual mean
Ozone (O_3)	Primary and Secondary	8 Hours	0.070 ppm	Annual fourth-highest daily maximum 8-hour concentration, averaged over 3 years

Pollutant	Primary/ Secondary	Averaging Time	Level	Measurement Criteria
$PM_{2.5}$	Primary	1 Year	12.0 µg/m³	Annual mean, averaged over 3 years
	Secondary	1 Year	15.0 µg/m³	Annual mean, averaged over 3 years
	Primary and Secondary	24 Hours	35 µg/m³	98th percentile, averaged over 3 years
PM_{10}	Primary and Secondary	24 Hours	150 µg/m³	Not to be exceeded more than once per year on average over 3 years
Sulfur Dioxide (SO_2)	Primary	1 Hour	75 ppb (196.45 µg/m³)	99th percentile of 1-hour daily maximum concentrations, averaged over 3 years
	Secondary	3 Hours	0.5 ppm (1309.63 µg/m³)	Not to be exceeded more than once per year

Source: Ecology, 2022a.

The NAAQSs set limits on the level of the criteria pollutants in the air over specified time periods. These ambient air quality standards are designed to protect people that are most susceptible to respiratory distress, including children, the elderly, and people with compromised health or who engage in strenuous outdoor exercise. EPA designates areas that do not meet the NAAQS for one or more criteria as non-attainment areas. Areas that were once designated non-attainment areas but have since achieved the NAAQS are classified as maintenance areas, while areas that have air pollution levels below the NAAQS are classified as attainment areas. States must develop plans to reduce emissions in non-attainment areas to bring measurements of the criteria pollutants back into compliance with EPA standards.

The Clean Air Act also requires the EPA to regulate 188 hazardous air pollutants (HAPs), also known as air toxics, from both mobile and stationary sources. HAPs are pollutants known or suspected to cause cancer or other serious health effects or have adverse environmental effects. EPA later identified 21 of these air toxics as mobile source air toxics (MSATs) and then extracted a subset of seven priority MSATs: benzene, formaldehyde, diesel particulate matter/diesel exhaust organic gases, acrolein, naphthalene, polycyclic organic matter and 1,3-butadiene. EPA enforces standards for controlling the emissions of HAPs from various sources within different industry groups, also known as source categories. Exposure to these pollutants in high concentrations for long durations increases the risk of cancer, damage to the immune system, neurological problems, reproductive, developmental, respiratory and other serious health problems.

The first phase of regulatory standards EPA develops for HAP sources are maximum achievable control technology (MACT) standards based on the level of emission control achieved by low-emitting sources in an industry. The second phase for controlling HAPs is a risk-based approach that occurs within eight years of the initial implementation of MACT standards. This residual risk review assesses the need for more health-protective standards.

The Clean Air Act is also the basis of most emissions-related regulations across the country, and has helped reduce GHGs from power plants, aircraft, and motor vehicles among other sources. EPA enacts standards for vehicle fuel efficiency and emissions and, as of December 31, 2021, has set the strictest standards for passenger vehicles and light-duty trucks. From model year (MY) 2023 to 2026, the stringency requirements were increased year-to-year, and the path forward from MY 2026 is set to continue that trend of tighter requirements. Fleetwide, MY 2026 vehicles are projected to produce 161 grams of CO_2 per mile, compared to 208 grams of CO_2 per mile as stated in the 2020 EPA regulations (NHTSA, 2020). Furthermore, MY 2026 vehicles will have a fleetwide fuel efficiency of 40 miles per gallon (MPG) compared to the 32 MPG required by 2020 regulations. EPA is also currently finalizing a Clean Trucks Plan to establish more stringent emissions standards on heavy-duty vehicles starting in MY 2027, specifically targeting NO_X emissions from diesel-powered trucks. EPA also establishes emissions standards from other mobile sources of pollution such as aircraft, aligning with the International Civil Aviation Organization to reduce GHG emissions in commercial aviation and large business jets.

Washington State

Washington Department of Ecology (Ecology) regulates over 430 toxic air pollutants from commercial and industrial sources in Washington state, prioritizing 21 of them due to the increased health risk and prevalence from common sources such as diesel emissions and wood smoke. Ecology is also responsible for monitoring statewide air quality and enforcing federal EPA standards through a State Implementation Plan (SIP), which includes Attainment SIPs (when an area doesn't meet NAAQS, i.e. non-attainment areas) and Maintenance SIPs (when an area must meet NAAQS for 20 years after a period of non-attainment). These SIPs also include specific state plans to address certain issues, such as the Regional Haze Plan, Smoke Management Program, and the Transportation Conformity Plan (TCP). The TCP ensures federal transportation funds support roadway and transit activities that align with SIPs for air quality. Attainment and Maintenance SIPs are also required to include enforceable limits on total pollution from all transportation sources, called "motor vehicle emissions budgets." These budgets put a cap on the total amount of transportation-related emissions that can be generated, including from projected future demand.

The State of Washington adopted the Climate Commitment Act (CCA) in 2021, which sets a statewide goal of a 95% reduction in carbon emissions by 2050 starting from a 1990 baseline year. One component of the CCA is a cap-and-invest program that caps the total emissions generated by the state and allows emitters to trade excess carbon emission budgets with one another. Emissions from gasoline, on-road diesel, and railroads are considered part of the 75% of "covered emissions" that would be incorporated into the cap-and-invest system. When these allowances are sold, the profits will be reinvested into projects that address air quality issues. The cap-and-invest program began in January 2023.

Washington State is also working to reduce mobile emissions through the 2020 Motor Vehicle Emissions Standards Law, which directs Washington to adopt vehicle emission standards set by the State of California—including the zero-emission vehicle (ZEV) standard, adopted in

November 2021. This requires 100% of all new passenger cars, light-duty trucks, and medium-duty vehicles sold in the state to be ZEVs starting in 2035, as well as setting stricter emission standards on medium- and heavy-duty trucks. Adopted in December 2022, Washington State adopted a new rule that requires new ZEV sales of passenger cars, light-duty trucks, and medium-duty vehicles to 100% starting in 2035.[12] It also requires cleaner, less polluting new heavy-duty internal combustion engines. In 2021, Governor Inslee signed the Clean Fuel Standard, which requires fuel suppliers to gradually reduce the carbon intensity of transportation fuels (gasoline, diesel) to 20% below 2017 levels by 2038.

Puget Sound Clean Air Agency

The Puget Sound Clean Air Agency (PSCAA) was formed in 1967 under the Washington Clean Air Act, with the authority to create regulations and to permit stationary air pollutant sources and construction emissions within King, Kitsap, Pierce, and Snohomish Counties. PSCAA contributes to statewide SIPs and adopted an updated Strategic Plan in January 2023. The updated Strategic Plan outlines goals and objectives through the year 2030. These Plans set goals and standards to implement a long-term vision for air quality and climate within the region. PSCAA also operates 20 ambient air quality monitoring stations throughout its four-county jurisdiction, and while most standards are in-line with Ecology and the EPA, after convening a "Particulate Matter Health Committee" in 1999, the PSCAA adopted a stricter health goal of 25 $\mu g/m^3$ for $PM_{2.5}$ versus 35 $\mu g/m^3$ in a 24-hour period.

City of Seattle

The City of Seattle was the first city in the United States to adopt a green building goal for all new municipal facilities, and in 2001 the City created a Leadership in Energy and Environmental Design (LEED) incentive program for new private projects. In 2011, the Seattle City Council adopted Resolution 31312, a long-term climate protection vision for Seattle with the goal of achieving net zero GHG emissions by 2050. In pursuit of this goal, in 2013 the City adopted the Climate Action Plan (CAP) to outline reduction targets for GHG emissions and to support City goals of building vibrant neighborhoods, driving economic prosperity, and furthering social equity. The plan identifies five main targets to be achieved by 2030, using the year 2008 as a baseline:

- 20% reduction in vehicle miles traveled;
- 75% reduction in GHG emissions per mile traveled by Seattle vehicles;
- 10% reduction in commercial building energy use;
- 20% reduction in residential building energy use; and
- 25% reduction in combined commercial and residential building energy use.

[12] See: https://ecology.wa.gov/Air-Climate/Reducing-Greenhouse-Gas-Emissions/ZEV#.

The Sustainable Buildings and Sites Policy (established by Resolution 31326) sets goals for City-owned properties to maximize the environmental quality, economic vitality, and social health of the City through design, construction, operation, maintenance, renovation, and decommissioning of City-owned buildings and sites.

Following the U.S.'s withdrawal from the Paris Climate Agreement in 2017, the City Council adopted Resolution 31757, directing the Office of Sustainability and Environment to identify additional actions necessary to limit global warming to an additional 1.5 degrees Celsius. Near-term priorities identified in the 2018 Climate Action Strategy are:

- Improving mobility through equitable road pricing policies;
- Passing of a new electric vehicle readiness ordinance;
- Creating a map of optimal distribution of an EV charging infrastructure;
- Converting 18,000 homes from heating oil to electric heat pumps;
- Doubling existing budget allocation for reducing energy in municipal buildings with the goal of reducing energy use by 40%;
- Scaling pay-for-performance efforts[13] and piloting innovative utility programming; and
- Providing programs and incentives to spur improved energy efficiency and reduced carbon emissions.

The City of Seattle also enacted the Green New Deal Resolution (Res 31895), with Mayor Jenny Durkan introducing the Green New Deal Executive Order (EO-2020-01) on January 8, 2020. Together, the resolution and executive order direct: (1) all City departments to work together with the Green New Deal Oversight Board, the Environmental Justice Committee, and other key stakeholders to establish goals and actions that advance the vision of a climate-pollution free city; (2) the Office of Sustainability & Environment (OSE) to work with City departments to identify actions to achieve the goals of the Green New Deal; (3) the OSE to work with Office of Intergovernmental Relations and the Mayor's Office to engage stakeholders on collaborative efforts to develop additional City policies, inform and support necessary funding and investments, and advance opportunities for partnership on actions that achieve the goals of the Green New Deal; (4) every new or substantially altered municipal building shall operate without fossil fuel systems and appliances (e.g., space heating and cooling, water heating, or cooking); (5) the OSE to work with stakeholders and City departments to determine key indicators that assist in the understanding of emissions trends; and (6) the Green New Deal team shall report progress on an annual basis.

The Green New Deal Oversight Board, established through Ordinance 125926, consists of representatives passionate about advancing an equitable transition to a clean energy economy and centering frontline communities and workers most impacted by climate change. The Green New Deal Oversight Board was entrusted with developing a workplan that:

[13] To address the "hard to reach" energy savings, Seattle City Light is developing programs specifically aimed at enabling greater levels of energy efficiency depth in buildings. Incentive payments are made over time based on measured energy savings and allow participants to bundle multiple projects and measures across capital, operational & maintenance, and behavioral improvements.

- Establishes a definition of what constitutes a policy, program or project that advances a Green New Deal for Seattle;
- Provides proposals for the design of new policies, programs, and projects and for modifications to existing policies, programs and projects to the Mayor, City Council, and City departments to advance a Green New Deal for Seattle;
- Supports the planning and implementation of individual City Departmental actions, policies, programs, and practices, to make Seattle climate-pollution free by 2030;
- Provides recommendations on City budget priorities and priority City actions; and
- Coordinates efforts with City departments and existing committees, boards, and commissions.

Executive Order 2021-09 (Driving Accelerated Climate Action) calls for all municipal buildings to operate without fossil fuel systems and appliances no later than 2035. In addition, EO 2021-09 calls for the acceleration of GHG emissions reduction from the city's transportation sector.

To reduce greenhouse gas emissions in the transportation sector, the City of Seattle adopted Executive Order 2018-02, which aims to have 100% of the City's fleet fossil-fuel free by 2030. This would mean rapid fleet electrification, or conversion to biofuels or renewable diesel/gasoline for municipal fleet vehicles.

Climate & Air Quality

Air quality is affected by pollutants from both natural and manmade sources. Vehicles and equipment that burn fossil fuels are typically among the largest contributors to transportation-related emissions and can contribute to regional and localized concentrations of CO, PM, NO_2, and O_3. State and federal standards regulate these pollutants along with the two other criteria pollutants (SO_2 and lead). The Puget Sound region is currently in attainment for all six criteria pollutants (Ecology, 2022a).

The City of Seattle is in the Puget Sound lowland. Buffered by the Olympic and Cascade mountain ranges and the Puget Sound, the lowland has a relatively mild, marine climate with cool summers and mild, wet, and cloudy winters.

The prevailing wind direction in the summer is from the north or northwest. The average wind speed is less than 10 miles per hour. Persistent high-pressure cells often dominate summer weather and create stagnant air conditions. This weather pattern sometimes contributes to the formation of photochemical smog.[14] During the wet winter season, the prevailing wind direction is from the south or southwest.

There is sufficient wind most of the year to disperse air pollutants released into the atmosphere. The region can be affected by wildfire smoke in the late summer and fall. Data

[14] See explanation: https://education.nationalgeographic.org/resource/smog/.

from these "exceptional events that are beyond the ability of air agencies to control" are excluded by the EPA for regulatory actions but are included in PSCAA and Ecology data collection.

Apart from wildfire events, air pollution is usually most noticeable in the late fall and winter, under conditions of clear skies, light wind and a sharp temperature inversion. Temperature inversions occur when cold air is trapped under warm air, thereby preventing vertical mixing in the atmosphere. These can last several days. If poor dispersion persists for more than 24 hours, the PSCAA can declare an "air pollution episode" or local "impaired air quality."

Pollutants of Concern

The largest contributors of pollution related to transportation construction projects and changes to travel patterns are construction equipment and vehicles traveling on roadways. The main pollutants emitted from transportation and non-transportation sources are CO, ozone precursors (VOC and NO_x), PM, GHGs, and HAPs. This section describes these pollutants and their effects on public health and the environment.

Carbon Monoxide (CO)

CO is an odorless, colorless, tasteless gas formed by the combustion of fuels containing carbon, with most CO emissions coming from motor vehicles, industrial activity, and wood burning. CO enters the bloodstream through the lungs and reduces the oxygen-carrying capacity of blood, affecting the function of organs and tissues. People with existing cardiovascular or respiratory issues may experience chest pains, nausea, fatigue, and dizziness when exposed to high levels of CO, though even healthy individuals may experience issues with alertness depending on the amount of exposure. As the most common source of CO emissions is motor vehicles, high concentrations are most present in urban areas, and it is the urban areas of Washington that have breached NAAQS in the past 30 years. The urban areas within Puget Sound were on attainment maintenance plans for CO from 1996 to 2016.

Nitrogen Dioxide (NO_2) & Ground-Level Ozone (O_3)

NO_2 is a red/brown reactive gas formed from the chemical reaction of nitrogen oxide (NO), hydroperoxy radical (HO_2), and alkylperoxy radical (RO_2) in the atmosphere. NO_2 and other nitrogen oxides (known as NO_x) can combine with volatile organic compounds (VOCs) in the atmosphere to form ozone. Vehicles such as automobiles and construction equipment are the most common sources of NO_X, along with marine vessels and industrial boilers and processes. While Washington has not violated NAAQS for NO_2, Ecology continues to measure NO_X levels at three sites within Seattle, as NO_X is a key contributor to ozone and fine particulate matter.

Ozone itself is a secondary air pollutant, produced in the atmosphere through a complex series of photochemical reactions involving VOCs (also sometimes referred to by some regulating agencies as reactive organic gases, or ROG), NO_X and sunlight. Ozone precursors are created

from combustion processes and the evaporation of solvents, paints, and fuels. Ozone levels are usually highest in the afternoon because of the intense sunlight and the time required for ozone to form in the atmosphere. Elevated concentrations of ground-level ozone can cause reduced lung function, respiratory irritation, and can aggravate asthma. Ozone has also been linked to immune system impairment. People should limit outdoor exertion if ozone levels are elevated, as even healthy individuals may experience respiratory issues on a high-ozone day. Ground-level ozone can also damage forests and agricultural crops, interfering with their ability to grow and produce food.

Currently all of Washington State is in attainment for NAAQS for ozone, with a complete maintenance plan for the Central Puget Sound Region in 2016.

Particulate Matter (PM_{10} & $PM_{2.5}$)

PM is a class of air pollutants that consists of a mixture of extremely small particles and liquid droplets such as acids, organic chemicals, metals, and soil or dust particles. PM takes three main forms depending on density—PM_{10} is considered "Coarse", with a diameter of 10µm or less. "Fine" particulate matter is also known as $PM_{2.5,}$ due to its diameter being 2.5µm or less. Lastly there are "Ultrafine" particles with a diameter less than 0.1µm, though these are not factored into EPA attainment designations. Particulate matter is a result of combustion, such as emissions from vehicles and industry, and from wood burning including wood stoves, fireplaces, and wildfires. In addition, particulate matter is generated from brake and tire wear from vehicles. High levels of particulate matter—especially $PM_{2.5}$—can result in a multitude of health impacts, including an increase in hospital visits for cardiovascular and respiratory problems, especially for sensitive populations. Decreased visibility may also derive from increased levels of particulate matter.

Currently, all of Washington is meeting air quality standards for both fine ($PM_{2.5}$) and coarse (PM_{10}) particulate matter, with maintenance plans for most of the state being completed recently. While there were extended periods of time when NAAQS were exceeded for particulate matter due to wildfires, the EPA allows data from days "influenced by exceptional events that are beyond the ability of air agencies to control" to be excluded for regulatory actions.

Other Pollutants

Since the phasing out of lead from gasoline in the U.S. in the 1980s, vehicle travel is no longer a major source of lead emissions, and lead emissions are not associated with changes in traffic volumes or travel patterns from implementation of the Seattle Comprehensive Plan.

SO_2 is produced by burning fuels that contain sulfur such as coal, oil, and diesel, or processing metals that contain sulfur. Historically, Washington has maintained very low measured levels of SO_2 and stopped most monitoring of SO_2 levels in the air. After EPA adopted a new SO_2 standard in 2010, Ecology evaluated ambient SO_2 levels throughout Washington, finding that all counties met that standard, apart from one area in Whatcom County (EPA, 2017). With the addition of

new emission control technologies, SO_2 from gasoline, diesel, and transportation-related sources have fallen over the past few decades due to a reduction of sulfur content in gasoline and diesel by nearly 90%. Changes in traffic volumes or travel patterns based on growth described in the Seattle Comprehensive Plan are not associated with changes in SO_2 generation.

Air toxic pollutant emissions or hazardous air pollutants (HAPs) are produced from both stationary and mobile sources, notably from motor vehicles in Seattle. EPA has been able to reduce benzene, toluene, and other air toxics emissions from mobile sources by placing stringent standards on tailpipe emissions and requiring the use of reformulated gasoline. However, changes in traffic volumes or travel patterns based on growth described in the Seattle Comprehensive Plan are likely to generate additional air toxics.

Greenhouse Gases & Climate Change

Generally, climate change can be described as the changing of the Earth's climate caused by natural fluctuations and anthropogenic activities (i.e., activities relating to, or resulting from the influence of human beings) that alter the composition of the global atmosphere. Changes in Earth's climate can include temperature, precipitation patterns; increases in ocean temperatures, sea level, and acidity; melting of glaciers and sea ice; changes in the frequency, intensity, and duration of extreme weather events and shifts in ecosystem characteristics, like the length of the growing season, timing of flower blooms, and migration of birds. Global mean temperatures in the United States have warmed during the 20th century and continue to warm into the 21st century.

The accumulation of GHGs in the atmosphere is a driving force in climate change. GHGs are gases that naturally trap heat by preventing the expulsion of solar radiation that hits the Earth, limiting the amount of radiation that is reflected back into space. This trapping of heat, known as the "greenhouse effect", keeps the earth's surface habitable. However, anthropogenic activities increase the concentrations of additional GHGs in the atmosphere, intensifying the natural greenhouse effect and increasing global average temperatures.

The principal GHGs of concern include carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), sulfur hexafluoride (SF_6), perfluorocarbons (PFCs) and hydrofluorocarbons (HFCs). These GHGs have a long atmospheric lifespan (1 year to several thousand years), and their potential to trap heat varies widely. Anthropogenic activities that release GHGs of concern include the combustion of fossil fuels for transportation, heating, and electricity generation. Other activities such as agricultural processes, industrial processes, waste decomposition, and deforestation all contribute to climate change.

Based on data compiled by the EPA, GHG emissions from human activities in the United States in 2020 decreased by 20% from 2005, but only 7% compared to 1990 levels. Global data compiled by the EPA show a 43% increase of net GHG emissions between 1990 and 2015. Despite recent reductions, the total warming effect from greenhouse gases produced by human activity to the Earth's atmosphere increased by 45% between 1990 and 2019 (EPA, 2022). The

National Oceanic and Atmospheric Administration's (NOAA) 2021 Annual Climate Report indicates that combined global land and ocean temperatures have increased an average of 0.14 degrees Fahrenheit per decade since 1880 and an average of 0.32 degrees Fahrenheit since 1981 (NOAA, 2022).

Ecology estimates that GHG emissions in Washington State peaked in 1999 at 110 million metric tons and declined after the economic recession in 2008 but have been rising gradually in recent years. In 2019, Washington State's GHG emissions were at their highest levels since 2007, increasing nearly 7% since 2018 and reaching 102.1 million metric tons (Ecology, 2022b). According to the 2020 Community Greenhouse Gas Emissions Inventory, core citywide emissions consisting of transportation, buildings, and waste sectors were 3,012,800 $MTCO_2e$ in the year 2020 (City of Seattle, 2020). Expanded emissions include sources such as freight transportation and air travel. Expanded emissions in 2020 were 5,087,600 $MTCO_2e$.

Air Quality Information Sources, Monitoring, & Trends

Data from PSCAA, Ecology, and EPA were used to compare criteria pollutant levels over the past three years to current NAAQS as summarized in **Exhibit 3.2-2**. This includes days with excessive wildfire smoke that were excluded from EPA determinations regarding attainment. Therefore, some data points may exceed the NAAQS, but this did not factor into attainment determinations for the State or the region.

Criteria pollutants are measured at four monitoring stations within Seattle: 10th and Weller, Duwamish, South Park, and Beacon Hill. Measured criteria pollutant levels decreased from 2019 to 2021 at all monitoring stations apart from ozone at Beacon Hill, which did not change, and 24-hour averaging $PM_{2.5}$ at Beacon Hill, which increased, but remained below the NAAQS. Both CO and NO_2 levels were consistently higher at the 10th & Weller station in Subarea 4 than at the Beacon Hill station in Subarea 8. On average, measurements for $PM_{2.5}$ with 1-year averaging were highest at the South Park station in Subarea 7, while measurements for $PM_{2.5}$ with 24-hour averaging were highest at the 10th & Weller station in Subarea 4.

Exhibit 3.2-2. Criteria Pollutant Levels in the City of Seattle 2019-2021

Pollutant	Station	Primary/ Secondary	Averaging Time	NAAQS	2019 Value	2020 Value	2021 Value
Carbon Monoxide (CO)	Beacon Hill (Subarea 8)	Primary	8 hours	9 ppm	0.80	1.70	0.60
			1 hour	35 ppm	1.17	1.79	0.77
Carbon Monoxide (CO)	10th & Weller (Subarea 4)	Primary	8 hours	9 ppm	1.10	1.20	1.00
			1 hour	35 ppm	1.50	1.53	1.37
Nitrogen Dioxide (NO_2)	Beacon Hill (Subarea 8)	Primary	1 hour	100 ppb	43.05	42.10	41.16
		Primary and Secondary	1 year	53 ppb	10.56	8.60	9.25
Nitrogen Dioxide (NO_2)	10th & Weller (Subarea 4)	Primary	1 hour	100 ppb	61.30	58.51	53.59
		Primary and Secondary	1 year	53 ppb	18.10	15.81	15.80
Ozone (O_3)	Beacon Hill (Subarea 8)	Primary and Secondary	8 hours	0.07 ppm	0.05	0.05	0.05
$PM_{2.5}$	Beacon Hill (Subarea 8)	Primary	1 year	12 µg/m³	6.57	6.50	5.70
		Secondary	1 year	15 µg/m³			
		Primary and Secondary	24 hours	35 µg/m³	25.80	34.43	26.00
$PM_{2.5}$	10th & Weller (Subarea 4)	Primary	1 year	12 µg/m³	N/A	8.70	7.77
		Secondary	1 year	15 µg/m³			
		Primary and Secondary	24 hours	35 µg/m³	N/A	37.50	30.57
$PM_{2.5}$	Duwamish (Subarea 7)	Primary	1 year	12 µg/m³	8.73	8.9	8.37
		Secondary	1 year	15 µg/m³			
		Primary and Secondary	24 hours	35 µg/m³	31.83	35.60	27.57
$PM_{2.5}$	South Park (Subarea 7)	Primary	1 year	12 µg/m³	9.13	8.80	8.10
		Secondary	1 year	15 µg/m³			
		Primary and Secondary	24 hours	35 µg/m³	36.73	26.40	16.93
PM_{10}	Beacon Hill (Subarea 8)	Primary and Secondary	24 hours	150 µg/m³	N/A	58.67	32.33

Sources: PSCAA, 2019a; PSCAA, 2020; PSCAA, 2021.

Sources of Air Pollution in Seattle

Citywide

Equipment with heavy-duty fossil fuel burning engines, such as locomotives, large trucks, construction equipment, freighters, cruise ships, and ferries are the main sources of transportation-related air pollution within Seattle, largely due to emissions produced by diesel motors. According to 2019-2020 annual average daily traffic (AADT) roadway data from Washington State Department of Transportation (WSDOT), the roads with the highest percentage of heavy truck traffic within Seattle are sections of I-5, SR-99, SR-519, and SR-522. Ocean-going vessels, harbor support vessels, ferries, and cargo-handling equipment at marine facilities are sources of air pollution along the waterfront, Harbor Island, and in the Duwamish waterway.

Point sources of air pollution within the manufacturing and industrial centers include industrial and non-transportation emissions sources including manufacturing plants, heavy and general industrial facilities, and manufacturing uses. Many point sources require obtaining permits from the PSCAA to operate. Residential communities bordering manufacturing and industrial centers are exposed to increased pollutant emissions due to their proximity to both transportation and point sources of pollution.

Construction equipment use is variable, intermittent, and geographically temporary, being more heavily associated with certain phases (such as earthmoving and grading) of active construction. However, when emissions are examined over a longer time frame, say annually, impacts are fairly constant and ubiquitous on a citywide basis.

Sources of non-transportation-related emissions include energy consumption and solid waste. Energy consumption consists of emissions from consumption of electricity and natural gas. Primary uses of electricity and natural gas within the City would be for space heating and cooling, water heating, ventilation, lighting, appliances, and electronics. Solid waste releases GHG emissions in the form of methane when these materials decompose.

EIS Analysis Areas

The most substantial sources of air pollution in each area of the City are described below.

Area 1

Area 1, located in northwest Seattle, is heavily affected by on-road sources of air pollutants. I-5 runs north-south along the southern section of the eastern boundary of Area 1 and SR-99 runs north-south and transects Area 1. The main source of railway pollutants is from the freight trains that operate on the Burlington Northern Santa Fe (BNSF)-owned tracks that run along the southern, western, and eastern boundaries of Area 1. Industrial uses are located along and adjacent to the southern boundary of the area. (See the map of rail lines in **Section 3.5 Noise**.)

Area 2

Area 2 is located in northeast Seattle and is heavily affected by on-road sources of air pollutants. I-5 runs along the southwestern boundary of and through the northwestern portion of Area 2. In addition, SR-522 runs through the northern portion of Area 2. The main source of railway pollutants is from the freight trains that operate on the BNSF-owned tracks that run along the western boundaries of Area 2. (See the map of rail lines in **Section 3.5 Noise**.)

130th/145th Station Area

The 130th/145th Station Area is located in northern Seattle in Area 2. I-5 transects this area going north-south, and a railway runs through the vicinity of the 130th Street Light Rail Station. No other major sources of air pollution are located within the Area.

Area 3

Area 3, which is located in western Seattle, is heavily affected by on-road and rail sources of air pollutants. SR-99 runs along the eastern boundary of Area 3. The main source of railway pollutants is from the freight trains that operate on the BNSF-owned tracks that run through and along the southwestern boundary of Area 3. Other sources of air pollution include commercial cruise and other non-industrial operations at the Port of Seattle and industrial land uses.

Area 4

Area 4 is located centrally within the City of Seattle and is heavily affected by on-road and rail sources of air pollutants. SR-99 runs through the area and I-5 runs along the eastern boundary. The main source of railway pollutants is from the freight trains that operate on the BNSF-owned tracks that run through Area 4. Another source of air pollution is commercial cruise and other non-industrial operations at the Port of Seattle. (See the map of rail lines in **Section 3.5 Noise**.) Industrial uses are located at the northwestern and southern portions of Area 4.

Area 5

Area 5 is located centrally within the City of Seattle and is heavily affected by on-road sources of air pollutants. I-5 runs along the western boundary, SR-520 runs along the northern boundary, and I-90 runs along the southern boundary of Area 5. The main source of railway pollutants is from a streetcar that operates on the tracks that run through Area 5. (See the map of rail lines in **Section 3.5 Noise**.) Industrial uses are located at the southwestern corner of the Area.

Area 6

Area 6 is located in southwestern Seattle. While Area 6 would be subjected to on-road pollutants from roadways, no major sources of air pollution are located within the Area. SR-509 runs along a relatively small segment of the southeastern boundary of the Area. Sources of railway pollutants are from freight trains that operate on the BNSF-owned tracks that run along

a relatively small segment of the northeastern boundary of Area 6, adjacent to the industrial district operating along the southern portion of the Port of Seattle. (See the map of rail lines in **Section 3.5 Noise**.) The Area is bound to the east by Area 7, which consists primarily of industrial-zoned land.

Area 7

Southern Seattle includes Area 7 which consists primarily of industrial-zoned land and is heavily affected by on-road, rail, maritime, and aviation sources of air pollutants. I-5 runs along the eastern boundary of and SR-509 runs through Area 7. Area 7 is heavily affected by rail operations from BNSF-owned tracks that run through the Area, which includes an intermodal facility and industrial district at the Port of Seattle. (See the map of rail lines in **Section 3.5 Noise**.) The King County International Airport is located in the southwestern portion of Area 7, contributing aviation-related pollutants.

Area 8

Area 8 is located in southeast Seattle and is heavily affected by on-road sources of air pollutants. I-5 runs along the western boundary and I-90 runs along the northern boundary of Area 5. The main source of railway pollutants is from the freight trains that operate on the BNSF-owned tracks that run along the western and northern boundaries of Area 8. (See the map of rail lines in **Section 3.5 Noise**.) Although not located within Area 8, the King County International Airport is located adjacent to Area 8 to the southwest and the Seattle Intermodal facility, which is source of railway pollutants, is located adjacent to the west of Area 8.

Air Toxics

Air toxic pollutant emissions or hazardous air pollutants (HAPs) are of concern in Seattle because of projected growth in vehicle miles traveled. The Puget Sound Regional Council estimates that by 2050, the population of the Puget Sound region will grow by 38% (1.6 million people) to reach a population of 5.8 million people (PSRC 2021), with the highest population increase estimated to be in King County, resulting in increased vehicle miles traveled.

Construction Emissions

Exhaust emissions from diesel off-road equipment represent a relatively small percentage of the overall emission inventory in King County: 0.6% of countywide CO, 7.1% of countywide NO_X, 0.97% of countywide PM_{10}, 2.53% of countywide $PM_{2.5}$, and 0.39% of countywide VOC (EPA, 2017). The primary emissions of concern (greater than 1% contribution) with regard to construction equipment are NO_X and $PM_{2.5}$ (the latter a priority air toxic). NO_X is primarily an air quality concern with respect to its role in (regional) ozone formation and the Puget Sound air shed has long been designated as an attainment area (meeting standards) with respect to ozone.

Sensitive Populations

Sensitive populations are those who are the most at-risk of adverse effects from elevated levels of air pollutants, whether due to age, previous or ongoing illnesses, socioeconomic status (SES), or other conditions such as pregnancy. According to the U.S. EPA, these sensitive groups include people with heart and lung disease, older adults (those 65 years of age or older), children, people with diabetes, and people of lower SES (EPA, 2023). This also includes those experiencing breathing troubles, such as those who have/have had COVID-19, asthma, cystic fibrosis, or other respiratory ailments. Those of lower SES may be more vulnerable to air pollution due to proximity to industrial sources of air pollution, underlying health issues, poor nutrition, stress, and other factors contributing to increased health impacts.

Land uses with populations sensitive to air quality include residential areas, schools, daycare facilities, hospitals, and nursing and convalescent homes. Residential communities that border industrial areas may be at risk of increased impact from pollutants due to their proximity to both transportation and point sources of pollution.

The Washington Environmental Health Disparities Map is used to locate areas with high environmental health risks posed to sensitive populations across the state; see **Exhibit 3.1-12 Environmental Health Disparities** in **Section 3.1 Earth & Water Quality**. The map accounts for pollution measures such as diesel emissions and ozone and proximity to sources of pollution. The goal of the map is to provide insight on prioritization of public investments to buffer environmental health impacts on the state's communities, so that everyone may benefit from clean and healthy air, water, and environments. The map was created with 19 indicators, and these indicators are divided into four themes: environmental exposures, environmental effects, sensitive populations, and socioeconomic factors. The combination of these indicators informs the environmental health disparities map by census tract. The map shows communities that are experiencing a disproportionate share of environmental health burdens and that will need more assistance to reach equitable outcomes, with 1 indicating census tracts with the lowest disparities and 10 indicating tracts with the highest disparities.

According to the Washington Department of Health, living in areas with more environmental hazards and population vulnerabilities is associated with a shorter lifespan, where population in census tracts of rank 1 on average lived 5.3 years longer than those in census tracts with the highest environmental health disparities (rank 10) (Washington Department of Health, n.d.).

Downtown/Lake Union, Capitol Hill/Central District, Duwamish, and SE Seattle rank the highest (in the 8-10 range) compared to the other subareas. The subareas that rank the lowest are NW Seattle and NE Seattle, which have tracts that rank in the 3 to 6 range.

Greenhouse Gas Emissions in Seattle

The City of Seattle conducted a *Community Greenhouse Gas Emissions Inventory* study in 2020, which analyzed emissions data based on the national standards set forth by the International

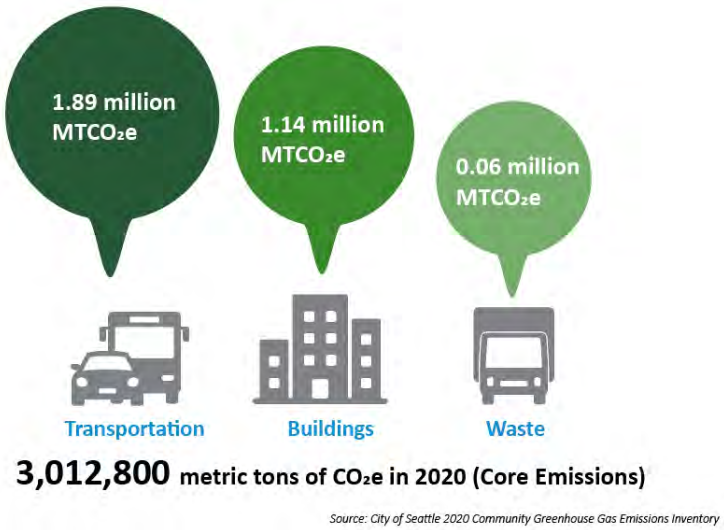
Council for Local Environmental Initiatives (ICLEI)—Local Governments for Sustainability. These standards make it easier to compare Seattle's emissions with other cities and past inventories.

GHGs were divided into core emissions and expanded emissions. Core emissions sources are those that the city can most directly and significantly impact, and most of the city's climate policies and programs are aimed at reducing core emissions. Core emissions include those from transportation, buildings, and waste sectors. Expanded emissions include all core emission sectors as well as additional sectors, subsectors, and categories. The additional category for expanded emissions includes industry-based emissions.

GHGs are measured by metric tons of carbon dioxide equivalents ($MTCO_2e$). The largest amount of core emissions in Seattle was contributed by the transportation sector, at 1.89 million $MTCO_2e$ (62%), followed by the buildings sector at 1.14 million MT, and waste at 0.06 million MT. A total of 3 million MT of CO_2e in core emissions were emitted in the city in 2020. CO_2e emissions in the transportation sector have decreased around 27.7% since 2008, when they measured 2.61 million MT. This decrease in emissions is due in part to improvements in vehicle efficiency standards, a decrease in vehicle miles traveled (VMT), and changes in travel patterns due to the COVID-19 pandemic in 2020.

For core emissions in the transportation sector, emissions are classified by roadway vehicle type as passenger emissions and truck emissions. Passenger emissions accounted for majority of emissions in the transportation sector at 1.68 million $MTCO_2e$, whereas truck emissions contributed only 207,000 $MTCO_2e$. Passenger emissions consist of both single- and high-occupancy vehicles, motorcycles, light trucks, and buses. Truck emissions consist of emissions from commercial trucks including light-, medium-, and heavy-duty commercial trucks (see **Exhibit 3.2-3**).

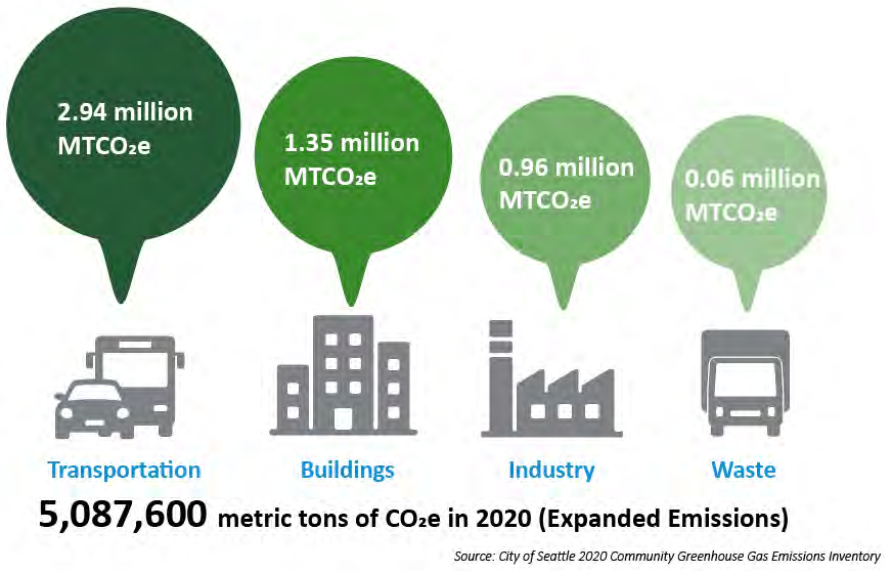
Exhibit 3.2-3. Core GHG Emissions in the City of Seattle



Source: City of Seattle, 2020.

For expanded emissions, the transportation sector also had the highest amount of CO_2e with 2.94 million MT (55%), followed by the buildings sector at 1.35 million MT, industry at 0.96 million MT, and waste at 0.06 million MT. A total of 5 million $MTCO_2e$ was emitted for expanded emissions in the city in 2020 (see **Exhibit 3.2-4**).

Exhibit 3.2-4. Expanded GHG Emissions in the City of Seattle



Source: City of Seattle, 2020.

Expanded emissions in the transportation sector are divided by air, marine, rail, passenger, and trucks. Passenger emissions still accounted for majority of emissions in the transportation sector at 1.68 million mt of CO_2e, while rail had the least amount at 27,000 MT CO_2e. Air transport and the industrial sector together comprised two of the largest sources of core and expanded emissions in 2020, approximately 844,000 mt of CO_2e (15.9% of total) and 962,000 mt of CO_2e (18.0% of total) respectively. Air transportation emissions have seen an uptick since 2008, due to increased economic activity and population growth.

3.2.2 Impacts

Impacts Common to All Alternatives

Construction Related Emissions

Future growth under any alternative would result in development of new residential, retail, light industrial, office, and community/art space. Most development projects in the city would entail demolition and removal of existing structures or parking lots, excavation and site preparation, and construction of new buildings. Emissions generated during construction activities would include exhaust emissions from heavy duty construction equipment, trucks used to haul construction materials to and from sites, worker vehicle emissions, as well as fugitive dust emissions associated with earth-disturbing activities, and other demolition and construction work.

Fugitive dust emissions are typically generated during construction phases. Activities that generate dust include building and parking lot demolition, excavation, and equipment movement across unpaved construction sites. The PSCAA requires dust control measures be applied to construction projects through Article 9, Section 9.15. Of these measures, those applicable to fugitive dust include (1) use control equipment, enclosures or wet suppression techniques, (2) paving or otherwise covering unpaved surfaces as soon as possible, (3) treating construction sites with water or chemical stabilizers, reduce vehicle speeds and cleaning vehicle undercarriages before entering public roadways and, (4) covering or wetting truck loads or providing freeboard in truck loads. In light of these requirements, impacts related to construction dust are concluded to be less than significant.

Criteria air pollutants would be emitted during construction activities from demolition and construction equipment, much of it diesel-powered, trucks used to haul construction materials to and from sites, and from vehicle emissions generated during worker travel to and from construction sites. Emissions are emitted in and around specific construction sites and are therefore dispersed geographically. The use of diesel-powered construction equipment would be temporary and episodic. The duration of exposure would be short and exhaust from construction equipment dissipates rapidly. Construction is temporary and would be transient throughout the site (i.e., move from location to location) and would not generate emissions in a fixed location for extended periods of time.

A number of federal regulations require cleaner off-road equipment. Specifically, the U.S. EPA has set emissions standards for new off-road equipment engines, classified as Tier 1 through Tier 4. To meet the Tier 4 emission standards, engine manufacturers will be required to produce new engines with advanced emission-control. By the time final Tier 4 regulations were fully implemented in 2015, PM and NO_X emissions had been reduced 99% compared to 1996 emissions (MTU, 2010). Consequently, it is anticipated that as the region-wide construction fleet converts to newer equipment the potential for health risks from off-road diesel equipment

will be substantially reduced. So, given the transient nature of construction-related emissions and regulatory improvements scheduled to be phased in, construction related emissions associated with all five alternatives of the Comprehensive Plan would be considered only a minor adverse air quality impact.

Greenhouse Gas Emissions

The scale of global climate change is so large that the impacts from any singular development project or programmatic action, even on the citywide scale of the development alternatives in this ~~Draft~~ Final EIS, would not have an individually discernible impact on global climate change. It is more appropriate to consider impacts on a "cumulative" scale. Thus, this EIS will consider how GHG emissions from future development in Seattle, in combination with emissions across the state, country, and planet to cumulatively contribute to global climate change.

Construction

GHGs would be emitted during construction activities from fossil-fueled demolition and construction equipment, trucks used to haul construction materials to and from sites, and from vehicle emissions generated during worker travel to and from construction sites. Construction and demolition emissions only represent approximately 2.71% of the emissions estimated in the 2020 GHG emissions inventory (City of Seattle, 2020).

Construction-related GHG emissions from any given development project that may occur in the next 20 years would be temporary and would not represent an on-going burden to the City's inventory. However, cumulatively it can be assumed that varying levels of construction activities within the city would be ongoing under any of the Plan alternatives and hence, cumulative construction related emissions would be more than a negligible contributor to GHG emissions within the city.

The City's Climate Action Plan recognizes the relevance of construction related GHG emissions and has included actions to be implemented by 2030 to address them. These include:

- Support new and expanded programs to reduce construction and demolition waste, such as creating grading standards for salvaged structural lumber so that it can be more readily reused;
- Expand source reduction efforts to City construction projects, and incorporate end-of-life management considerations into City procurement guidelines; and
- Phase-in bans on the following construction and demolition waste from job sites and private transfer stations: recyclable metal, cardboard, plastic film, carpet, clean gypsum, clean wood and asphalt shingles.

The City's *2022 Solid Waste Plan Update: Moving Upstream to Zero Waste* aligns its waste-related goals with the sustainability and climate goals of CAP. The 2022 Solid Waste Plan Update emphasizes the elimination or minimization of waste from the start. The 2022 Solid Waste Plan Update includes recommendations to increase public awareness to expand support

of waste prevention and opportunities for reuse. Strategies to reduce waste include, but are not limited to, reducing single-use items, food waste, require all single-use food services to use compostable packaging, and enhance diversion of construction and demolition debris at transfer stations.

Additionally, the West Coast Collaborative, a public-private partnership including the U.S. EPA, equipment manufacturers, fleet owners, state and local governments and non-profit organizations leverages federal funds to reduce emissions from the highest polluting engines. With Ecology and privately owned construction companies, the Collaborative installed diesel oxidation catalysts on construction equipment and trucks, reducing carbon emissions by 121.4 tons annually (West Coast Collaborative, 2023).

Although construction related emissions would not be negligible, because of the combination of regulatory improvements and parts of the Climate Action Plan that are under way, construction related GHG emissions associated with all alternatives would result in minor adverse climate impacts.

Operations—Transportation

Mobile emissions were estimated using the EPA's Motor Vehicle Emission Simulator (MOVES) model. The MOVES model is a state-of-the-science emission modeling system that estimates emissions for mobile sources at the national, county, and project level for criteria air pollutants and GHG emissions. Projected vehicle miles traveled (VMT) by passenger vehicles, trucks, and buses were used to estimate criteria pollutant and GHG emissions.

The approach to estimating future year transportation related GHG emissions considers two factors:

- The projected change in VMT
- The projected change in fuel economy of the vehicle fleet

VMT in 2044. Travel demand models predict VMT in future years for various classes of vehicles (e.g., cars, trucks, buses). The model generally assumes continuation of current economic and demographic trends, with minor shifts toward shorter trips and more trips made by modes other than automobile travel. This will reduce VMT per capita, but total VMT in the region would continue to rise modestly due to population and employment growth. If emissions were projected based solely on the increase in VMT, with no changes assumed to fuel economy, emissions under each of the 2044 alternatives would increase compared to existing conditions. However, the trend toward more stringent federal standards means it is reasonable to assume improved fuel economy, and lowered GHG emissions, by 2044.

A mix of land uses is associated with reduced VMT (WSDOT, 2013). Diversity in land uses combined with increased density within an urban area can lead to shorter trip distances and greater use of walking, as well as the reduced need for vehicle ownership. Accessibility to a variety of trip purposes, as in mixed use developments, may induce additional trips; however, these trips are shorter and are more likely to be made by walking than trips in areas where

mixed land uses are not available. Travel demand models include findings about projected VMT in future years for various classes of vehicles (e.g., cars, trucks, buses). The model generally assumes continuation of current economic and demographic trends, with minor shifts toward shorter trips and more trips made by modes other than automobile travel. Improvements in fuel efficiency combined with reductions in VMT would contribute to reductions in emissions.

Fuel Economy in 2044. Federal programs are mandating improved fuel economy, which reduces GHG emissions, for passenger cars and light trucks. Transportation-related emissions in 2044 would be lower as compared to existing conditions due to improvements in fuel economy. The National Highway Traffic and Safety Administration (NHTSA) is responsible for establishing vehicle standards and for revising existing standards. Compliance with Federal fuel economy standards is not determined for each individual vehicle model. Rather, compliance is determined based on each manufacturer's average fuel economy for the portion of their vehicles produced for sale in the United States. On March 31, 2022, the NHTSA finalized their Corporate Average Fuel Economy (CAFE) standards for model years 2024 to 2026. The final rule requires an industry-wide fuel average of approximately 49 miles per gallon (mpg) for passenger cars and light trucks in model year 2026 by increasing fuel efficiency by 8% annually for model years 2024 and 2025 and 10% for model year 2026 (NHTSA, 2023). The NHTSA estimates that final standards will reduce emissions of CO, VOC, NO_X, and $PM_{2.5}$ emissions attributable to the light-duty on-road fleet dramatically between years 2020 and 2050 (NHTSA, 2022).

As discussed above, Washington State adopted a new rule in December 2022 that requires new ZEV sales of passenger cars, light-duty trucks, and medium-duty vehicles to 100% starting in 2035. It also requires cleaner, less polluting new heavy-duty internal combustion engines. ZEVs do not release tailpipe air pollution. A ZEV continues to run clean throughout its life, unlike a standard petroleum-powered vehicle, which typically pollutes more as it ages and parts wear out. Progress toward 100% ZEV sales in 2035 would increase the rate of registration of ZEVs in Seattle, resulting in reduced tailpipe emissions and the need for charging infrastructure.

Results. All ~~four~~ 2044 alternatives for which VMT data was provided result in roughly the same annual GHG emissions, as shown in **Exhibit 3.2-5**. ~~Alternative 5~~The Preferred Alternative, which includes the most concentrated growth, is expected to have the highest total GHG emissions. Alternative 5, which has the same growth as the Preferred Alternative, has ~~and~~ the lowest GHG per capita among the alternatives. Alternative 1, the No Action Alternative, is expected to have the lowest total GHG emissions and the highest GHG emissions per capita. However, the variation is within approximately one half of one percent. This is because the projected improvements in fuel economy outweigh the projected increase in VMT. Therefore, roadway emissions are considered a minor adverse impact.

Exhibit 3.2-5. Total and Per Capita Citywide Road Transportation Emissions GHG ($MTCO_2e$) and Per Capita Emissions by Alternative

	Existing	Alternative 1	Alternative 2	Alternative 3	Alternative 4*	Alternative 5	Preferred Alternative**
Total	**31,070**	**29,408**	**30,235**	**30,235**	**30,235**	**31,246**	**31,363**
Per Capita	**0.19**	**0.14**	**0.15**	**0.15**	**0.15**	**0.13**	**0.13**

Notes: The Preferred Alternative, along with notes, was added to this exhibit since the Draft EIS—edits made to Alternatives 1–5 are shown in tracks.
* Traffic data is not available for Alternative 4 because the projected VMT would fall between Alternative 2 and Alternative 3. For purposes of the analysis, it has been assumed that Alternative 4 VMT is equivalent to Alternative 2, which is higher than Alternative 3.
** Growth under Alternative 5 and the Preferred Alternative would be the same. The difference in the allocation of growth results in differing trip patterns and VMT. VMT under the Preferred Alternative would be approximately 0.38% greater than Alternative 5. Preferred Alternative emissions have been estimated by increasing Alternative 5 emissions by 0.38%.
Source: Kimley-Horn, 2024~~3~~.

Operations—Energy

GHG emissions from electrical use are generated when energy is generated by the non-renewable sources of an electrical supplier such as Seattle City Light. However, Seattle City Light is carbon neutral and, consistent with the City's Climate Action Plan, no emissions related to electricity are assumed because Seattle City Light will maintain its commitment to carbon neutrality.

GHG emissions from natural gas are direct emissions resulting from on-site combustion for heating and other purposes. ~~All-electric space and water heating is required by the 2022 Washington Energy Code. However, all-electric cooking appliances has not been required. According to household end-use consumption data, approximately 13% of natural gas consumption in residential uses is for purposes other than space and water heating (U.S. EIA, 2015).~~ Natural gas usage has been estimated by dividing total natural gas consumption by residential uses in the State of Washington in 2020 ~~(before all-electric space and water heating is required)~~ by the total housing units in the state in 2020 (U.S. EIA, 2023 and U.S. Census, 2020). ~~Based on the assumption that 13% of natural gas consumption is used for purposes other than space and water heating, natural gas consumption has been adjusted accordingly (see **Appendix D** for detailed calculations).~~ GHG emissions from natural gas demand are calculated using the CalEEMod land use model (version 2020.4.0).[15] This model is recognized by the Puget Sound Clean Air Agency as an estimation tool (PSCAA, 2019).

[15] The 2018 Seattle Energy Code requires all-electric space and water heating. GHG emissions were estimated assuming natural gas consumption for purposes other than space and water heating (13% [U.S. EIA, 2015]). Due to the passing of I-2066, natural gas bans are prohibited. Therefore, GHG emissions have been increased and adjusted to assume no restrictions on natural gas for new development.

Operations—Solid Waste

Solid waste-related emissions are generated when the increased waste generated by new development and infrastructure is disposed in a landfill where it decomposes. Future growth within the city would result in an increase in solid waste disposal. GHG emissions associated with solid waste disposal has been estimated using CalEEMod (version 2020.4.0). Increased emissions from solid waste generation were estimated using Ecology solid waste and recycling data (Ecology, 2018). These emissions were then adjusted to account for waste diversion implemented through waste reduction, recycling and composting fostered by the City's carbon-neutral goal target of 70% waste diversion by 2030. Impacts related to energy-generated GHGs would be considered a minor adverse impact.

Equity & Climate Vulnerability Considerations

Exposure to Air Pollution

Future growth and development patterns under Comprehensive Plan growth strategies would affect future residences' (or other "sensitive receptors") relationships to mobile and stationary sources of air toxics and particulate matter $PM_{2.5}$. The degree of potential for adverse impacts on new sensitive receptors would depend on proximity to major sources of these pollutants, the emissions from these sources, and the density of future sensitive development.

Portions of Seattle located along major roadways (freeways and the most-traveled highways) are exposed to relatively high levels of air borne toxics, resulting in high cancer risk values. In 2008, the Washington State Department of Health conducted a study of cancer risks in the Duwamish Valley. Results of the analysis indicate that on-road mobile sources contribute to the highest cancer and non-cancer risks near major roadways over a large area of south Seattle and that risks and hazards are greatest near major highways and drop dramatically at approximately 200 meters (approximately 656 feet) from the center of highways (WSHA, 2008). Modeling indicates increased cancer risks in existing residential areas of up to 800 in one million.[16] Risks above 100 per one million persons (100 excess cancer risk) is a criterion identified by U.S. EPA guidance for conducting air toxic analyses and making risk management decisions at the facility and community-scale level. Risks and hazards drop dramatically in places farther than 200 meters (656 feet) from the center of highways. A similar phenomenon occurs in proximity to rail lines that support diesel locomotive operations. Given this, it would be prudent to consider risk-reducing mitigation strategies. Because the authority to set standards for locomotives and heavy-duty on-road vehicle emissions lies exclusively with the U.S. EPA, the only strategies available to the City for consideration are related to reducing exposure. As discussed above, measures such as setbacks for residential and other sensitive land uses from major traffic corridors and rail lines are effective. Other measures to protect sensitive land uses from being exposed to substantial levels of toxic air contaminants include

[16] These risks should not be interpreted as estimates of disease in the community, only as a tool to define potential risk.

requirements for enhanced air filtration, restricting open spaces and operable windows near to the source of toxic air contaminants, and siting intake vents as far from substantial sources as practicable.

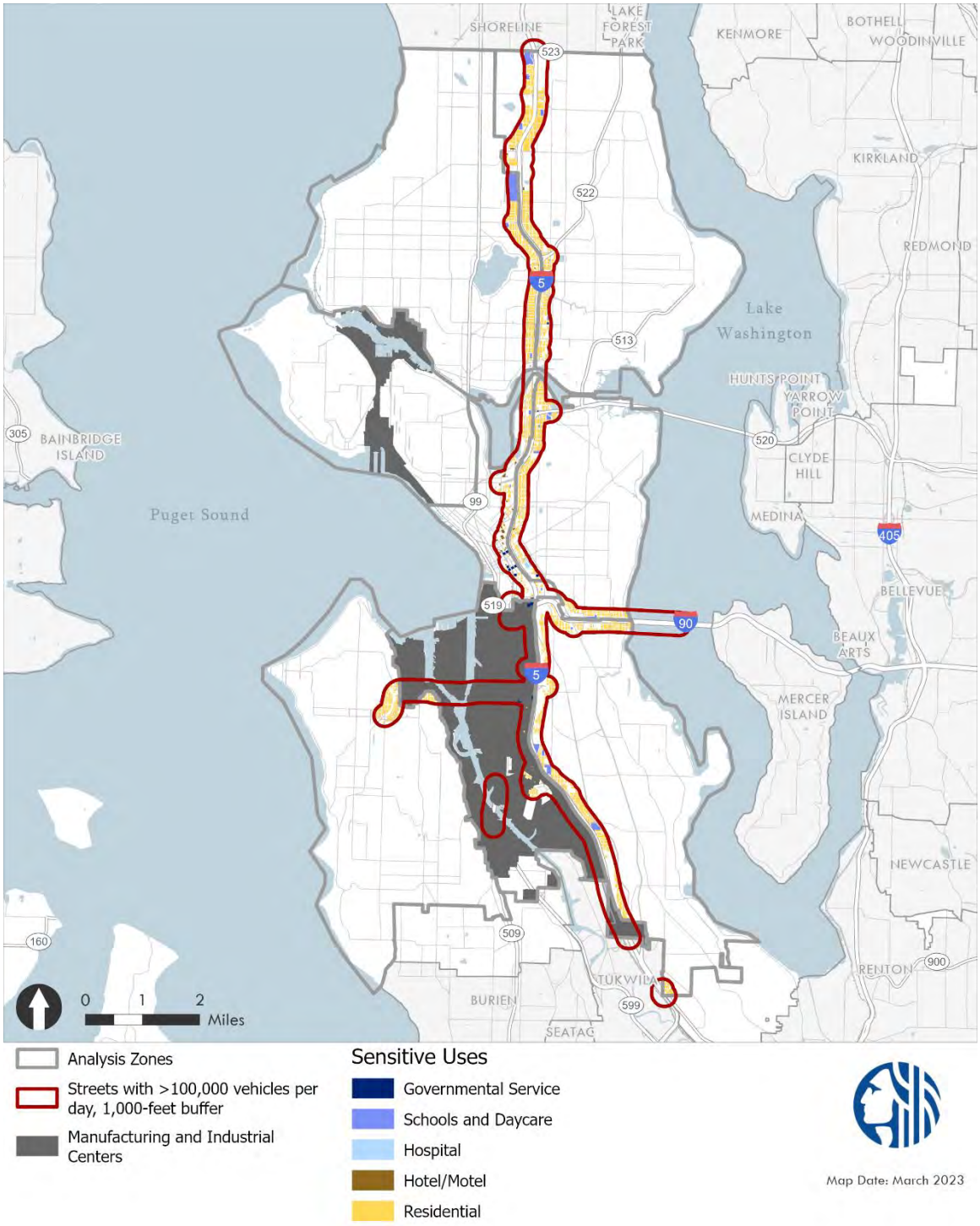
Portions of Seattle are also exposed to relatively high cancer risk values from stationary sources and near port operations where ship emissions and diesel locomotive emissions and diesel forklift emissions can all occur. Similarly, distribution centers that involve relatively high volume of diesel truck traffic can also represent a risk hazard to nearby sensitive land uses. This is considered a moderately adverse impact to air quality. The City has identified measures for receptors proposed in areas proximate to manufacturing industrial centers to reduce the potential risk through the Seattle Industrial and Maritime Lands Final EIS (2022), such as implementing buffer areas of 500 to 1,000 feet and enhanced air filtration systems.

Although, as discussed above, risks and hazards drop dramatically in places farther than 200 meters (656 feet) from the center of highways, a buffer area of 500 to 1,000 feet has been considered to reduce the potential exposure of sensitive populations to air toxics (City of Seattle, 2022). **Exhibit 3.2-6** shows a 1,000-feet buffer around roadways and highways with daily trips greater than 100,000 vehicles. This shows that existing uses along Interstate 5 (I-5) north of Interstate 90 (I-90) consist primarily of residential uses, within 1,000 feet of transportation sources of air pollutants. Under any alternative, increased residential densities could be expected within this buffer. Variations in potential density increases in these areas under each alternative are discussed further below.

This potential increased exposure to cancer risk is considered a potential moderate adverse impact related to air quality.

To address the impact, the City could consider risk-reducing mitigation strategies such as setbacks for residential and other sensitive land uses from major traffic corridors, rail lines, port terminals and similar point sources of particulates from diesel fuel and/or to identify measures for sensitive populations proposed to be in areas near such sources such as upgraded air filtration systems.

Exhibit 3.2-6. 1,000-Feet Buffer Around Freeways and Roadways with Greater than 100,000 Daily Vehicles



Source: Kimly-Horn, 2023.

Impacts of Alternative 1: No Action

Under Alternative 1 future growth would continue based on continuation of the 2035 Comprehensive Plan, with a target housing growth of 80,000 dwelling units. New housing would consist primarily of rental apartments concentrated in existing mixed-use areas. Approximately 46% of housing growth would occur within urban centers and approximately 18% would occur within residential urban villages.

Construction

As discussed above, emissions generated during construction activities would include exhaust emissions from heavy duty construction equipment, trucks used to haul construction materials to and from sites, worker vehicle emissions, as well as fugitive dust emissions associated with earth-disturbing activities, and other demolition and construction work. Emissions associated with future development cannot be determined on a program level as construction activities are project-specific. Therefore, a comparative discussion of construction emissions is based on projected housing units demolished and target housing growth under each of the alternatives. Alternative 1 would result in the least amount of demolished housing units and the lowest ~~target~~ growth compared to all other alternatives. Therefore, emissions associated with heavy-duty construction equipment, trucks, worker vehicles, and fugitive dust would likely be the lowest among all alternatives.

Operations

Transportation-Related Air Quality Emissions

VMT within the City of Seattle would increase as a result of population and employment growth under Alternative 1. Projected changes in VMT were extracted from the projected travel demand model for cars, trucks, and buses. The travel demand model generally assumes existing economic and demographic trends continue with minor changes due primarily to mode share shifts and shortened trips due to increased density. These changes cause projected VMT per capita to decline slightly by 2044. However, total VMT would continue to rise modestly due to population and employment growth.

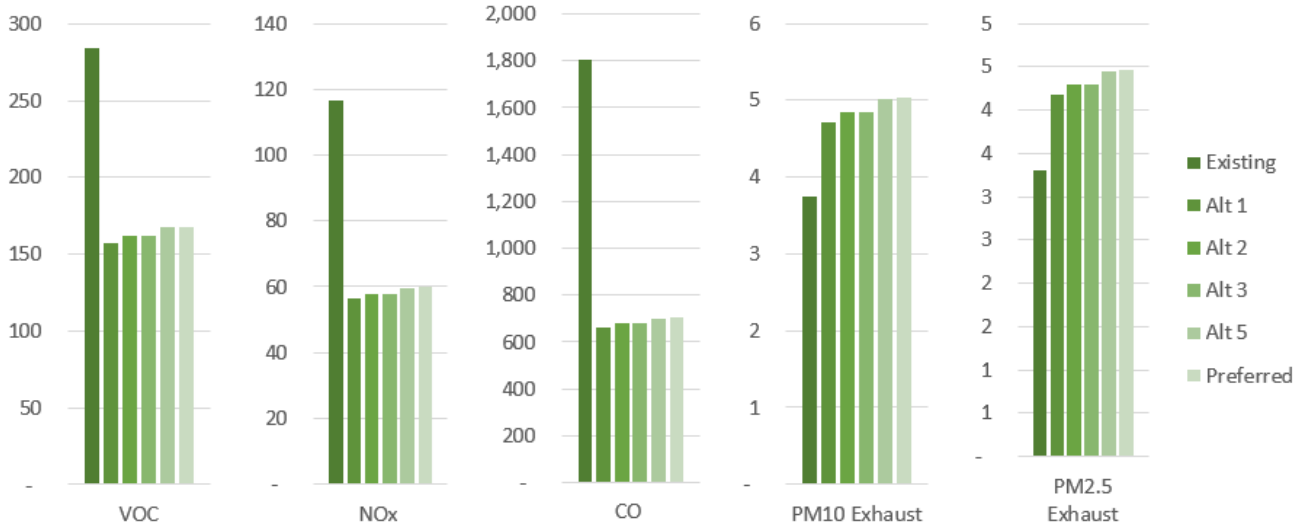
All of the 2044 alternatives are expected to generate lower air pollutant emissions than in 2018, resulting in a net decrease in transportation-related emissions of VOC, CO, and NO_X. This is because the projected improvement in fuel economy outweighs the projected increase in VMT for those criteria pollutants. Transportation-related air pollutant emissions under existing conditions and each of the ~~four~~ alternatives with VMT data are presented in **Exhibit 3.2-7** and **Appendix D**. Note that these emissions are City-wide assuming development under each alternative.

In addition to the tailpipe emissions presented in **Exhibit 3.2-7**, vehicle travel would also generate PM_{10} and $PM_{2.5}$ through tire and brake wear and, more significantly, from entrained

road dust. These non-tailpipe emissions would not benefit from future improvements to the vehicle fleet as a whole or from improvements to fuel composition. Therefore, PM_{10} and $PM_{2.5}$ emissions attributable to fugitive dust is not represented in **Exhibit 3.2-6** (see **Appendix D**).

As can be seen from **Exhibit 3.2-7** regional VOC, CO, and NO_X emissions under Alternative 1 would be substantially lower than under 2018 background conditions. This is because the projected improvement in fuel economy, emission controls and fuel composition will outweigh the projected increase in VMT. Emissions of PM_{10} and $PM_{2.5}$ would be approximately 1 ton/year greater than under existing conditions, which is a nominal increase. This would represent a beneficial future air quality outcome due to significant decreases in VOC, CO, and NO_X emissions. As indicated in **Exhibit 3.2-7**, Alternative 1 would have the lowest criteria pollutant emissions of ~~the five~~ all alternatives.

Exhibit 3.2-7. Road Transportation Pollutant Emissions (pounds per day)



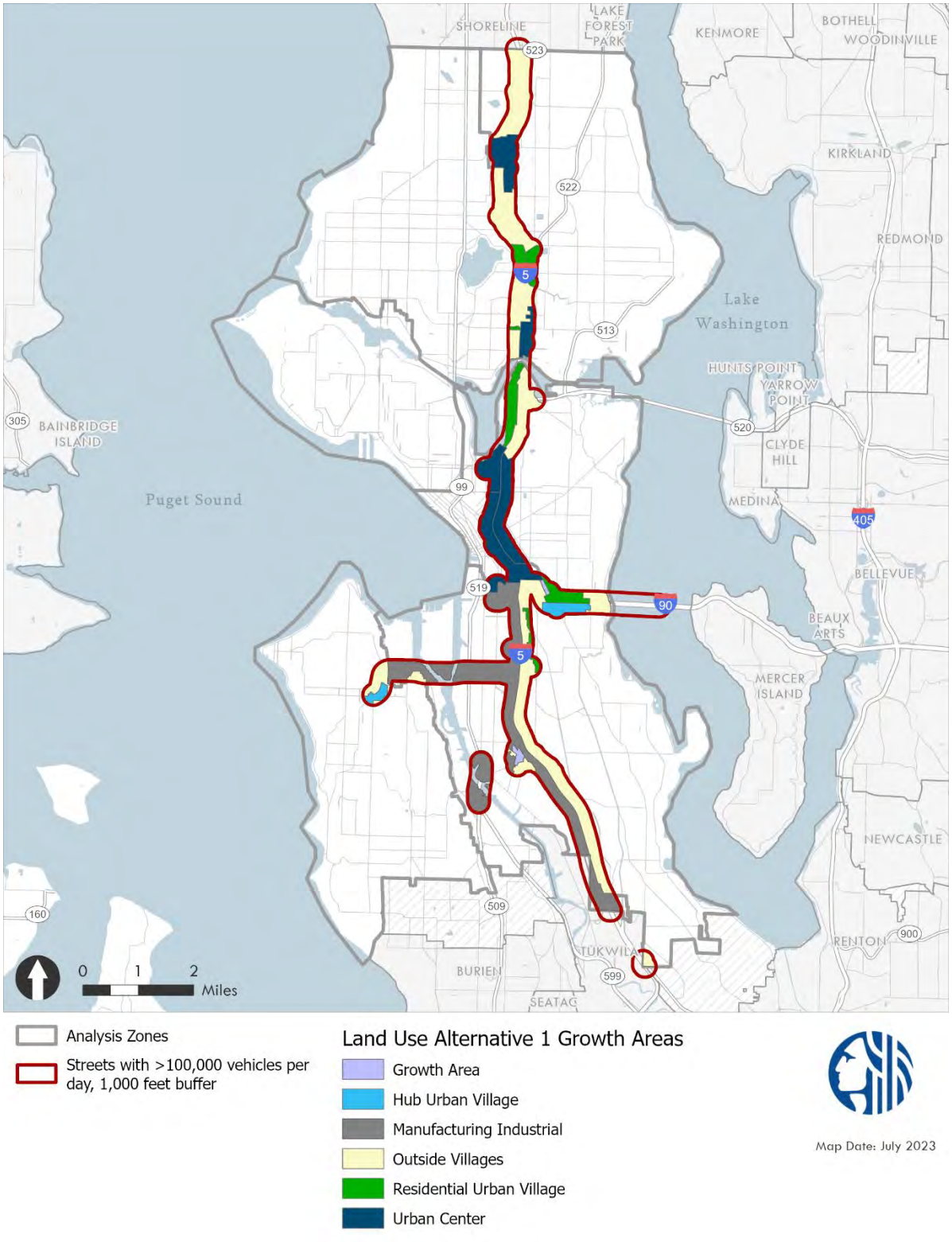
Note: The Preferred Alternative was added to this exhibit since the Draft EIS—no changes were made to Alternatives 1–5.

Source: Kimley-Horn, 2024~~3~~.

Equity & Climate Vulnerability Considerations

As shown in **Exhibit 3.2-8**, several urban centers and urban villages are located within 1,000-feet of roadways with greater than 100,000 daily vehicles. Collectively, these urban centers and villages represent 56% of all projected residential growth in the city through 2044. Only a portion of each center or village is within the 1,000-feet buffer, so the potentially affected portion of the new residents would be smaller. Compared to all other alternatives, the number of units within the affected urban centers and villages would be the lowest (same as Alternative 3 and 4).

Exhibit 3.2-8. 1,000-Feet Buffer Around Freeways and Roadways with Greater than 100,000 Daily Vehicles—Alternative 1



Source: Kimley-Horn, 2023.

Greenhouse Gas Emissions

Changes in operational GHG emissions associated with growth under Alternative 1 would result from increases in VMT and improvements to the vehicle fleet, electrical and natural gas usage, and solid waste generation. GHG emissions from electrical usage are generated when energy consumed is generated by the non-renewable resources of an electrical supplier such as Seattle City Light. However, Seattle City Light is carbon neutral and, consistent with the City's Climate Action Plan, no emissions related to electricity are assumed because City Light will maintain its commitment to carbon neutrality. GHG emissions from natural gas are direct emissions resulting from on-site combustion for heating and other purposes. Solid waste-related emissions are generated when the increased waste generated by development is disposed in a landfill where it decomposes, producing methane gas.[17]

Operational GHG emissions from Alternative 1 are presented in **Exhibit 3.2-9** and **Appendix D**. The transportation emissions reductions from existing emissions due to implementation of Alternative 1 would be the greatest of any of the five alternatives, largely as the result of lower VMT compared to other alternatives which is a reflection of the lowest overall housing growth ~~target~~ and the concentration of that growth within urban centers and urban villages. Reflecting the lowest overall housing growth ~~target~~, the building and waste emissions associated with Alternative 1 would be the lowest of all the alternatives.

Exhibit 3.2-9. Per Capita GHG Emissions—Alternative 1

	Emissions ($MTCO_2e$)
Transportation	-1,662
Buildings	372,474~~48,422~~
Waste	60,834
Total Alternative 1	**431,647**~~107,594~~
Population Growth Estimate	164,000
Per Capita GHG Emissions	**2.63**~~0.66~~

Notes: Population growth calculated using City GIS data for total housing units and population (total units/population = persons per household), assuming 2.05 persons per household
Source: Kimley-Horn, 2024~~3~~.

Per capita GHG emissions due to ~~target~~ growth is calculated by dividing the total GHG emissions by the anticipated population growth. According to the Seattle 2020 Community GHG Inventory, citywide core per capita emissions was 4.09 $MTCO_2e$ per resident in 2020 (City of Seattle, 2020). As shown in **Exhibit 3.2-9**, Alternative 1 would result in per capita emissions of 2.63~~0.66~~ $MTCO_2e$, which is significantly lower than the existing per capita rate.

[17] CH4 from decomposition of municipal solid waste deposited in landfills is counted as an anthropogenic (human-produced) GHG

130th/145th Station Area

Zoning designations under Alternative 1 would be retained within the 130th/145th Station Area and no new areas will be designated for mixed-use or higher density than exists under existing conditions. The future light rail station at 130th would be developed in an area that would allow three-story single-purpose residential development and four- to eight-story multifamily surrounding the future 145th BRT Station. Implementation of Alternative 1 assumes a growth potential of 840 housing units and 716 jobs in proximity to the future light rail and BRT stations.

Construction

Station Area growth under Alternative 1 would be the lowest compared to all other alternatives. Therefore, emissions associated with heavy-duty construction equipment, trucks, worker vehicles, and fugitive dust would likely be the lowest among all alternatives.

Operations

Criteria Pollutant Emissions

Transit has been identified as the most frequent and successful tool in reducing VMT (WSDOT, 2022). Transit improvements overall provide a VMT reduction of up to 2.6% (WSDOT, 2022). Therefore, transit service and connectivity provided by the future light rail and BRT stations in combination with Alternative 1 growth potential, in comparison to baseline conditions, would result in improved transit service and connectivity when compared to existing conditions, providing greater potential for VMT reduction and reductions in criteria pollutants.

Greenhouse Gas Emissions

As stated above, transit service and connectivity provided by the future light rail and BRT stations in combination with Alternative 1 growth potential, in comparison to baseline conditions, would result in improved transit service and connectivity when compared to existing conditions, providing greater potential for VMT reduction and reductions in GHG emissions. In addition, the housing growth potential under Alternative 1 would be the lowest compared to all other alternatives. Therefore, GHG emissions associated with building energy use and solid waste would be lowest under Alternative 1.

Equity & Climate Vulnerability Considerations

The 130th/145th Station Area is located in northern Seattle in Area 2. I-5 transects this area going north-south, and a railway runs through the vicinity of the 130th Street Light Rail Station. ~~Target g~~Growth under Alternative 1 within the Station Area would be lowest among all other alternatives and would place the least number of residents within close proximity to transportation-related pollutants along I-5.

Impacts of Alternative 2: Focused

Under Alternative 2, areas of focused growth called neighborhood centers would create more housing around shops and services, allowing for a wide range of housing types. The target housing growth under this alternative is 100,000 dwelling units. Approximately 37% of housing growth would occur within regional centers and approximately 24% would occur within neighborhood centers.

Construction

Alternative 2 would result in a greater number of demolished housing units compared to Alternative 1 and less than all other ~~A~~alternatives ~~3, 4, and 5~~. Alternative 2 would result in greater ~~target~~ growth compared to Alternative 1, the same as Alternative 3 and 4, and less than Alternative 5 and the Preferred Alternative. Therefore, emissions associated with heavy-duty construction equipment, trucks, worker vehicles, and fugitive dust under Alternative 2 would likely be greater than Alternative 1 and lower than Alternative 3, 4, and 5 and the Preferred Alternative.

Operations

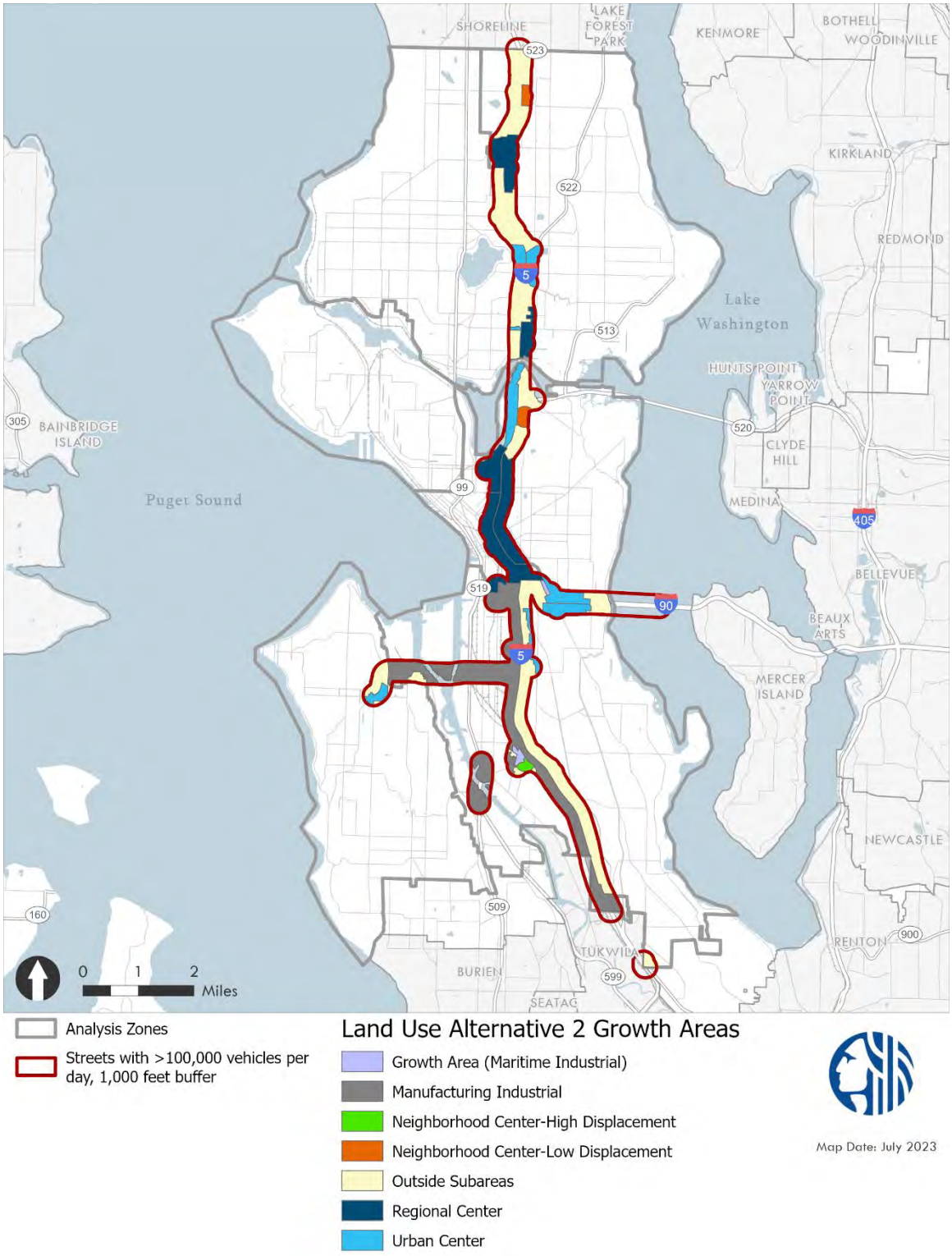
Transportation Air Quality Emissions

Transportation-related air pollutant emissions under existing conditions and each of the four alternatives are presented in **Exhibit 3.2-7** and **Appendix D**. As can be seen from **Exhibit 3.2-7,** regional emissions of VOC, CO, and NO_X under Alternative 2 would be substantially less compared to existing background conditions. This is because the projected improvement in fuel economy, increase in ZEV use, emission controls and fuel composition will outweigh the projected increase in VMT. This would result in a beneficial future air quality outcome. As indicated in **Exhibit 3.2-7**, transportation emissions from Alternative 2 would be slightly higher than those from Alternative 1, mostly because reductions in transportation emissions (from existing background conditions) realized from implementation of Alternative 2 would be slightly less than those of Alternative 1.

Equity & Climate Vulnerability Considerations

In addition to the regional centers and villages that would be within the 1,000-feet buffer under Alternative 1, Alternative 2 would place additional neighborhood centers units within the buffer, as shown in **Exhibit 3.2-10**. Included in the additional units is the 130th/145th Station Area. Although a greater number of units would be closer to transportation sources of pollution and thus at higher risk than under Alternative 1, overall units within these regional centers, urban center, and neighborhood centers consists of 46% of overall projected growth, which is higher than that of Alternative 1. Only a portion of each center is within the 1,000-feet buffer, so the potentially affected portion of the new residents would be smaller. Alternative 2 would place a greater number of units within the 1,000-foot buffer when compared to Alternative 1, 3, and 4, but fewer units compared to Alternative 5 and the Preferred Alternative.

Exhibit 3.2-10. 1,000-Feet Buffer Around Freeways and Roadways with Greater than 100,000 Daily Vehicles—Alternative 2



Source: Kimley-Horn, 2023.

Greenhouse Gas Emissions

GHG emissions under development of Alternative 2 were calculated using the same methodologies as those described for Alternative 1 but reflect the increases in target housing growth in neighborhood centers throughout the city. Operational GHG emissions from Alternative 2 are presented in **Exhibit 3.2-11** and **Appendix D**. Alternative 2 would result in less reductions in transportation GHG emissions compared to Alternative 1, largely as the result of greater VMT which is a reflection of the greater housing growth ~~target~~. However, under Alternative 2, the additional growth is focused in neighborhood centers, including transit-oriented developments that would potentially decrease trip lengths. Therefore, as shown in **Exhibit 3.2-11**, the per capita GHG emissions associated with Alternative 2 growth ~~targets~~ would be 2.20~~0.55~~ $MTCO_2e$, lower than the per capita emissions under Alternative 1. Emissions related to building energy and solid waste would be greater than Alternative 1. Although target housing and employment growth would be the same under Alternative 2, 3, and 4, building and waste emissions would be lower for Alternative 2 due to variations in housing type mix and associated emissions factors.

Exhibit 3.2-11. Per Capita GHG Emissions—Alternative 2

	Emissions ($MTCO_2e$)
Transportation	-834
Buildings	388,378~~50,489~~
Waste	64,053
Total Alternative 2	**451,597**~~113,708~~
Population Growth Estimate	205,000
Per Capita GHG Emissions	**2.20**~~0.55~~

Notes: Population growth calculated using City GIS data for total housing units and population (total units/population = persons per household), assuming 2.05 persons per household
Source: Kimley-Horn, 2024~~3~~.

130th/145th Station Area

Under Alternative 2, changes in land use designations focus on addressing transit-oriented developments, designating the station areas as neighborhood centers. Growth would be clustered in small mixed-use nodes near transit, resulting in denser and taller buildings with heights of up to 80 feet. Implementation of Alternative 2 assumes a growth potential of 2,208 housing units, which is greater than the growth potential with Alternative 1.

Construction

Station Area growth under Alternative 2 would be higher than Alternative 1 and lower than Alternative 5 and the Preferred Alternative. Emissions associated with heavy-duty construction equipment, trucks, worker vehicles, and fugitive dust would likely be greater than Alternative 1 and less than Alternative 5 and the Preferred Alternative based on the ~~target~~ growth in dwelling units.

Operations

Criteria Pollutant Emissions

Increased growth potential within neighborhood centers combined with improvements to transit service and connectivity, when compared with Alternative 1, would result in greater potential for VMT reduction and reductions in criteria pollutant emissions.

Greenhouse Gas Emissions

As stated above, increased growth potential within neighborhood centers combined with improvements to transit service and connectivity, when compared with Alternative 1, would result in greater potential for VMT reduction, resulting in reductions in GHG emissions. However, ~~target~~ growth within the Station Area under Alternative 2 would be greater than Alternative 1, resulting in higher emissions related to building energy consumption and solid waste generation.

Equity & Climate Vulnerability Considerations

The 130th/145th Station Area is located in northern Seattle in Area 2. I-5 transects this area going north-south, and a railway runs through the vicinity of the 130th Street Light Rail Station. ~~Target g~~Growth under Alternative 2 within the Station Area would be greater than Alternative 1 and would place a greater number of residents within close proximity to transportation-related pollutants along I-5. Compared to Alternative 5 and the Preferred Alternative, Alternative 2 would place a fewer number of residents within close proximity to transportation-related pollutants along I-5.

Impacts of Alternative 3: Broad

Under Alternative 3, a wider range of low-scale housing options in urban neighborhood areas would be allowed, expanding housing choices and allowing housing options near existing parks and other amenities. The target housing growth under this alternative is 100,000 dwelling units. Approximately 37% of housing growth would occur within regional center and approximately 22% would occur within urban neighborhood areas.

Construction

Alternative 3 would result in the greatest number of demolished units when compared to all other alternatives except for the Preferred Alternative. Alternative 3 would result in greater ~~target~~ growth compared to Alternative 1, the same as Alternative 2 and 4, and less than Alternative 5 and the Preferred Alternative. Although Alternative 3 would result in 763 greater demolished units than Alternative 5, ~~target~~ growth for Alternative 3 includes 20,000 fewer units. Therefore, emissions associated with heavy-duty construction equipment, trucks, worker

vehicles, and fugitive dust would likely be greater than Alternative 1, 2, and 4 and lower than Alternative 5 and the Preferred Alternative.

Operations

Transportation Air Quality Emissions

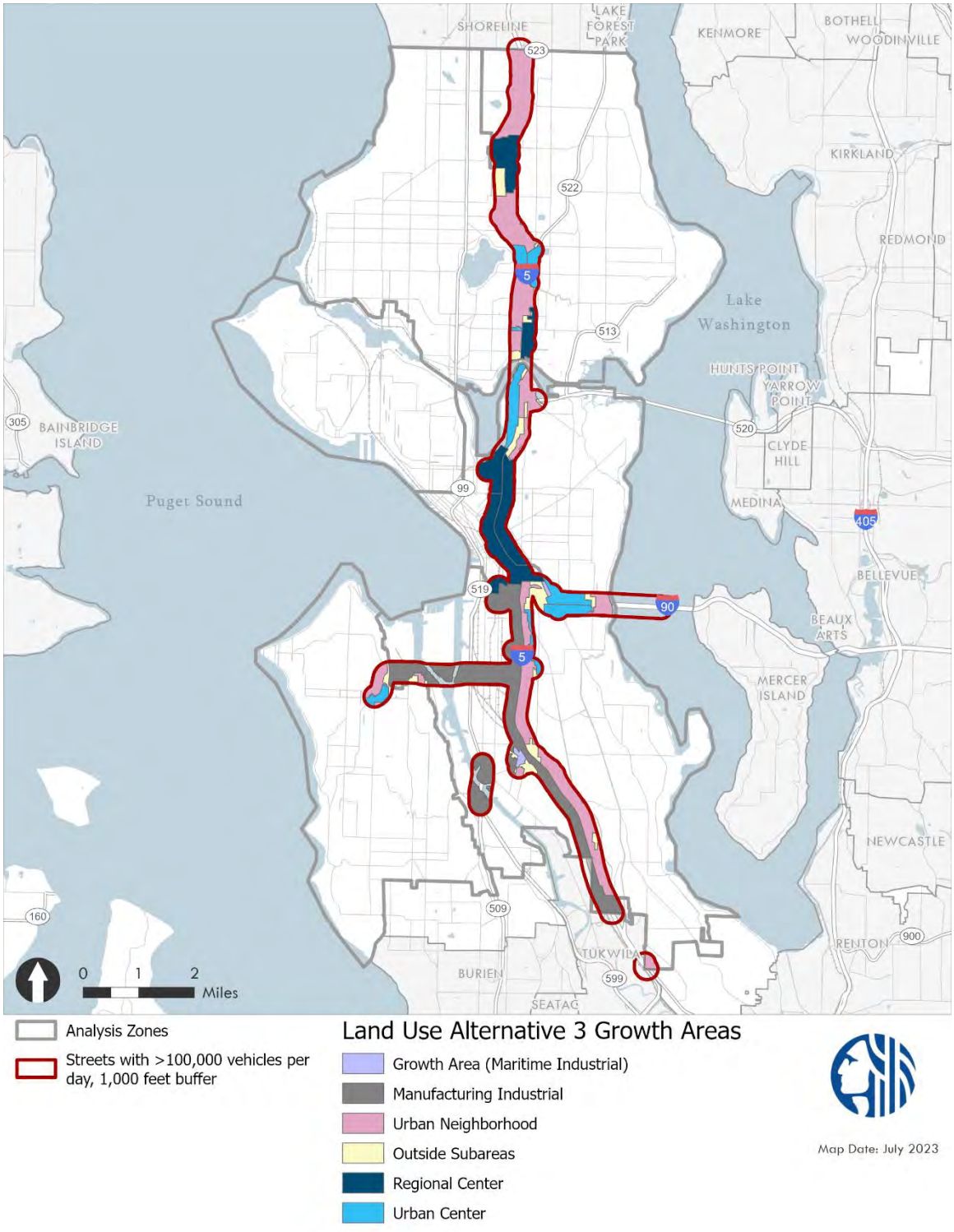
Transportation-related air pollutant emissions under existing conditions and each of the alternatives with VMT data are presented in **Exhibit 3.2-7** and **Appendix D**.

As can be seen from **Exhibit 3.2-7,** regional emissions of VOC, CO, and NO_X under Alternative 3 would be substantially less than under existing background conditions. This is because the projected improvement in fuel economy, increase in ZEV use, emission controls and fuel composition will outweigh the projected increase in VMT. This would result in a beneficial future air quality outcome. As indicated in **Exhibit 3.2-7**, transportation emissions from Alternative 3 would be slightly higher than those from Alternative 2, mostly because reductions in transportation emissions (from existing background conditions) realized from implementation of Alternative 3 would be the same as those of Alternative 2 but less than those of Alternative 1.

Equity & Climate Vulnerability Considerations

As shown in **Exhibit 3.2-12**, the regional centers and villages within the 1,000-feet buffer under Alternative 3 would be the same as Alternative 1, collectively representing 56% of all projected residential growth in the city through 2044. Only a portion of each center or village is within the 1,000-feet buffer, so the potentially affected portion of the new residents would be smaller. A greater proportion of city-wide growth would be located in close proximity to transportation-related emissions when compared to Alternative 2. Alternative 3 would place the fewest number of units (the same as Alternative 1 and 4) within the 1,000-foot buffer when compared to Alternatives 2 and 5 and the Preferred Alternative.

Exhibit 3.2-12. 1,000-Feet Buffer Around Freeways and Roadways with Greater than 100,000 Daily Vehicles—Alternative 3



Source: Kimley-Horn, 2023.

Greenhouse Gas Emissions

GHG emissions under development of Alternative 3 were calculated using the same methodologies as those described for Alternative 1 but reflect the increases in target housing growth in urban neighborhoods throughout the city. Operational GHG emissions from Alternative 3 are presented in **Exhibit 3.2-13** and **Appendix D**. Alternative 3 would result in fewer reductions in transportation emissions compared to Alternative 1 and similar to those of Alternative 2 and 4. Emissions related to building energy and waste would be greater than Alternatives 1, 2, and 4 and less than Alternative 5 and the Preferred Alternative. Per capita emissions of 2.220.56 $MTCO_2e$, as shown in **Exhibit 3.2-13**, are the same as Alternative 4, greater than Alternative 2 and 5, and less than Alternative 1.

Exhibit 3.2-13. Per Capita GHG Emissions—Alternative 3

	Emissions ($MTCO_2e$)
Transportation	-835
Buildings	391,73650,926
Waste	64,294
Total Alternative 3	**455,196114,385**
Population Growth Target	205,000
Per Capita GHG Emissions	**2.220.56**

Notes: Population growth calculated using City GIS data for total housing units and population (total units/population = persons per household), assuming 2.05 persons per household
Source: Kimley-Horn, 20243.

130th/145th Station Area

The station area plan would not be implemented under Alternative 3; it would grow based on the applicable citywide place types.

Impacts of Alternative 4: Corridor

Alternative 4 would accommodate a wider range of housing options only in corridors to focus growth near transit and amenities. The target housing growth under this alternative is 100,000 dwelling units. Approximately 37% of housing growth would occur within regional centers and approximately 21% would occur within corridors.

Construction

Alternative 4 would result in the demolition of a greater number of housing units than Alternative 1 and 2 and less than Alternatives 3 and 5 and the Preferred Alternative. Alternative 4 would result in greater target growth compared to Alternative 1, the same as Alternative 2

and 3, and less than Alternative 5 and the Preferred Alternative. Therefore, emissions associated with heavy-duty construction equipment, trucks, worker vehicles, and fugitive dust would likely be greater than Alternative 1 and 2 and lower than Alternatives 3 and 5 and the Preferred Alternative.

Operations

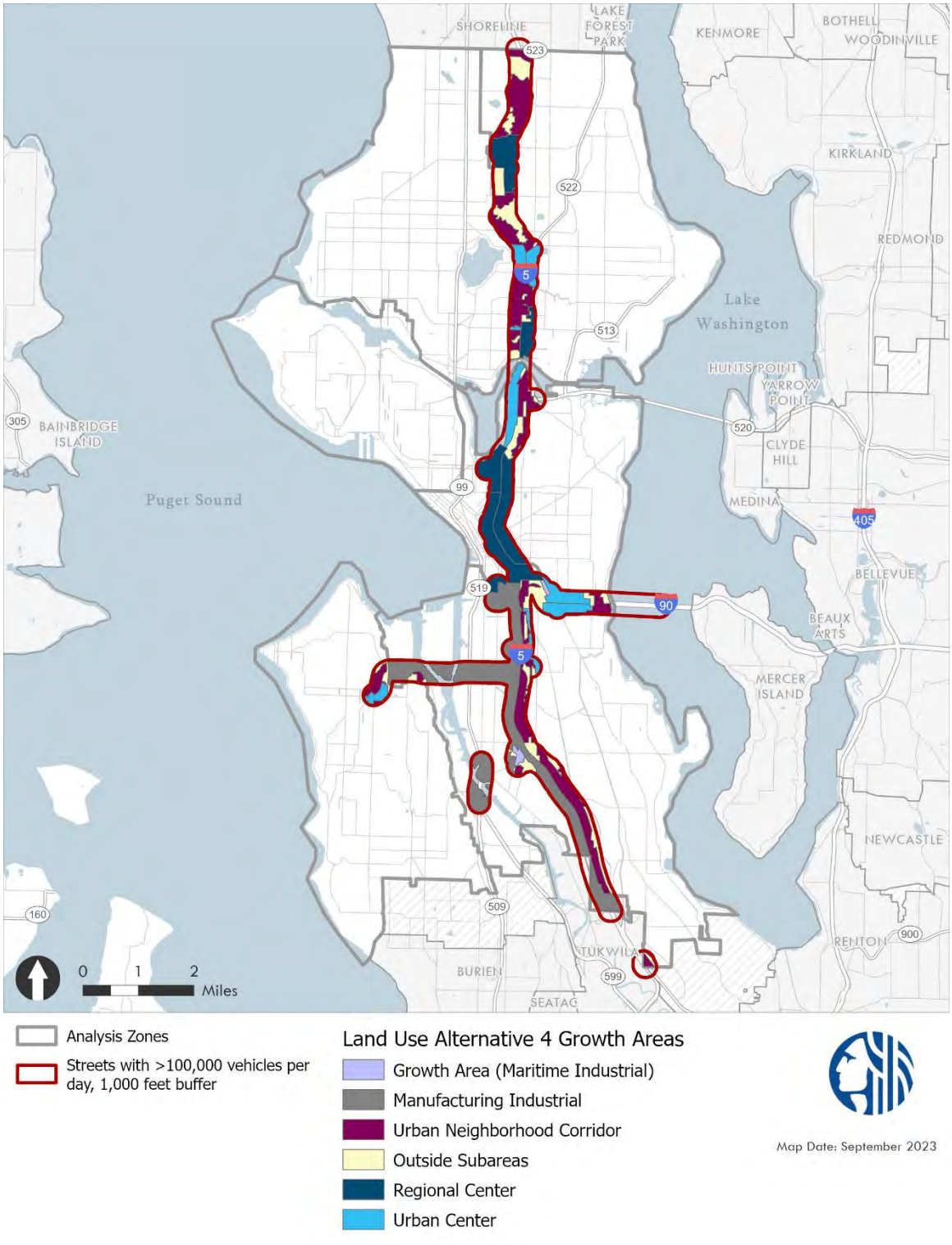
Transportation Air Quality Emissions

Transportation-related air pollutant emissions under existing conditions and each of the ~~four~~ alternatives with VMT data are presented in **Exhibit 3.2-7** and **Appendix D**. The housing growth ~~target~~ under Alternative 4 would be the same as Alternative 2 and Alternative 3 and the geographical distribution of that housing growth under Alternative 4 would be to similar areas of the city as Alternative 3 as well. Therefore, VMT data has not been modeled for Alternative 4 and it is assumed that regional pollutant emissions under Alternative 4 would be the same as Alternative 3, which would be substantially less than under existing background conditions, greater than Alternative 1, and less than Alternative 5 and the Preferred Alternative.

Equity & Climate Vulnerability Considerations

As shown in **Exhibit 3.2-14**, the regional centers and villages within the 1,000-feet buffer under Alternative 4 would be the same as Alternative 1 and Alternative 3, collectively representing 56% of all projected residential growth in the city through 2044. Only a portion of each center or village is within the 1,000-feet buffer, so the potentially affected portion of the new residents would be smaller. A greater proportion of city-wide growth would be located in close proximity to transportation-related emissions when compared to Alternative 2. Alternative 4 would place the fewest number of units (the same as Alternative 1 and 3) within the 1,000-foot buffer when compared to Alternatives 2 and 5 and the Preferred Alternative.

Exhibit 3.2-14. 1,000-Feet Buffer Around Freeways and Roadways with Greater than 100,000 Daily Vehicles—Alternative 4



Source: Kimley-Horn, 2023.

Greenhouse Gas Emissions

GHG emissions under development of Alternative 4 were calculated using the same methodologies as those described for Alternative 1 but reflect the land use differences of increased density of residential development in the corridors throughout the city. Operational GHG emissions from Alternative 4 are presented in **Exhibit 3.2-15** and **Appendix D**. The transportation emissions reductions realized from implementation of Alternative 4 would be similar to those of Alternative 2 and Alternative 3. Emissions related to building energy and solid waste would be greater than Alternative 1 and 2 and less than Alternatives 3 and 5 and the Preferred Alternative. Per capita emissions of 2.21~~0.56~~ $MTCO_2e$ (as shown in **Exhibit 3.2-15**) are the same as Alternative 3, higher than Alternative 2 and 5, and lower than Alternative 1.

Exhibit 3.2-15. Per Capita GHG Emissions—Alternative 4

	Emissions ($MTCO_2e$)
Transportation	-835
Buildings	389,644~~50,654~~
Waste	64,294
Total Alternative 4	**453,104**~~114,113~~
Population Growth Estimate	205,000
Per Capita GHG Emissions	**2.21**~~0.56~~

Notes: Population growth calculated using City GIS data for total housing units and population (total units/population = persons per household), assuming 2.05 persons per household
Source: Kimley-Horn, 2024~~3~~.

130th/145th Station Area

The station area plan would not be implemented under Alternative 4; it would grow based on the applicable citywide place types.

Impacts of Alternative 5: Combined

Alternative 5 anticipates the largest increase in supply and diversity of housing units within the city. In addition to the growth strategies of Alternatives 2, 3, and 4, Alternative 5 would promote a greater range of rental and ownership housing and address past underproduction of housing and rising housing costs. The target housing growth under this alternative is 120,000 dwelling units. While most housing would continue to be in regional centers (36% of housing growth) and urban centers (19% of housing growth), the combined growth in neighborhood centers and corridors would be substantial (24%).

Construction

Alternative 5 would result in a greater number of demolished units than Alternative 1, 2, and 4 and less than Alternative 3 and the Preferred Alternative. Alternative 5 and the Preferred Alternative would result in the greatest ~~target~~ growth compared to all other alternatives. Therefore, emissions associated with heavy-duty construction equipment, trucks, worker vehicles, and fugitive dust would likely be ~~the~~ greatest~~est~~er ~~out of all give a~~ than Alternatives 1, 2, 3, and 4 but lower than the Preferred Alternative.

Operations

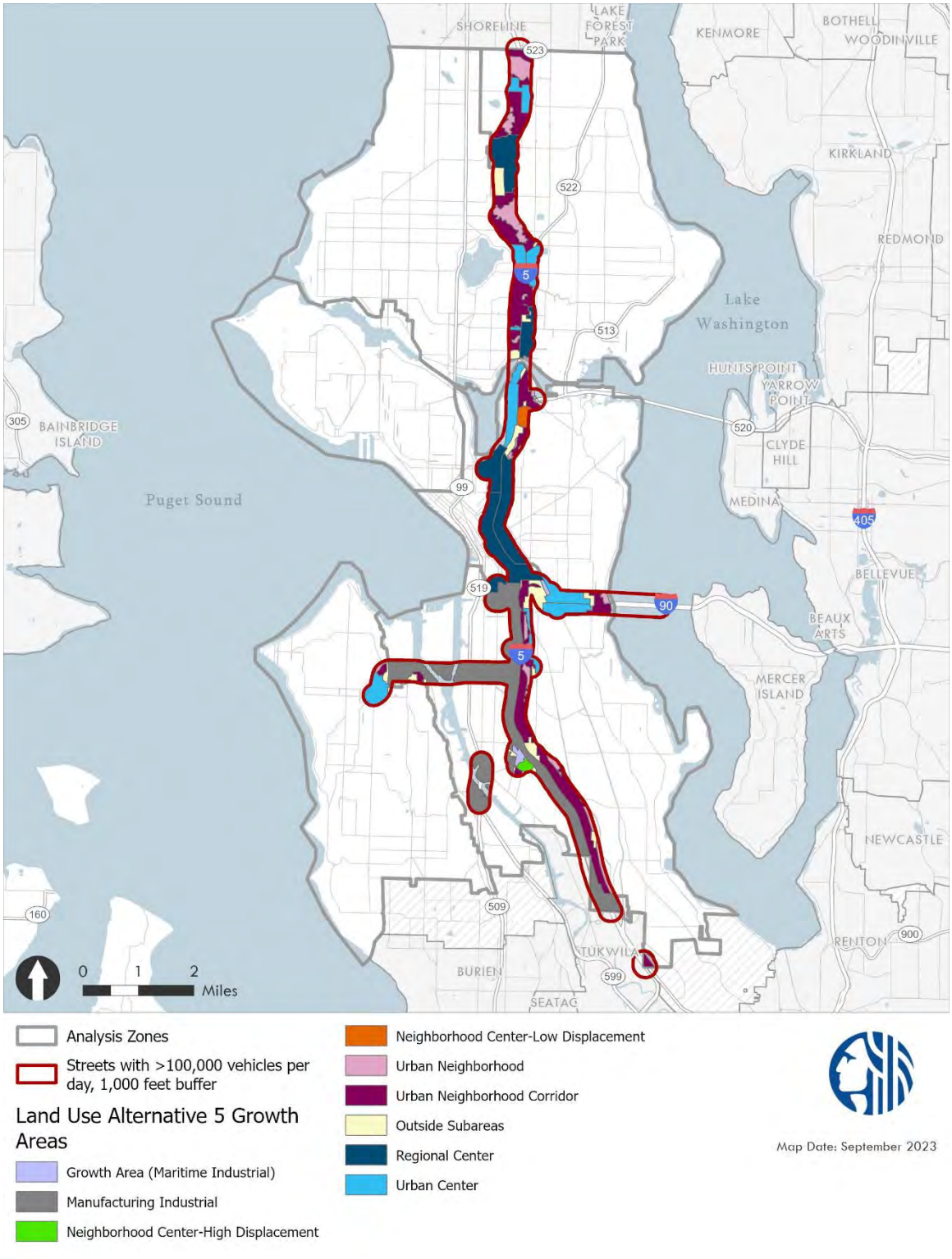
Transportation Air Quality Emissions

Transportation-related air pollutant emissions under existing conditions and each of the four alternatives with VMT data are presented in **Exhibit 3.2-7** and **Appendix D**. As can be seen from **Exhibit 3.2-7**, emissions of VOC, CO, and NO_X under Alternative 5 would be substantially less than under existing background conditions. This is because the projected improvement in fuel economy, increase in ZEV use, emission controls and fuel composition will outweigh the projected increase in VMT. This would result in a beneficial future air quality outcome. As indicated in **Exhibit 3.2-7**, transportation emissions from Alternative 5 would be higher than those from all other alternatives, mostly because Alternative 5 has the highest housing and jobs targets, resulting in the highest VMT, compared to all other alternatives.

Equity & Climate Vulnerability Considerations

This alternative would place the emphasis for growth near transit centers, with the 130th Street station designated as an urban center. In addition, additional neighborhood center units would be located in close proximity to transportation-related emissions as shown in **Exhibit 3.2-16**. Consistent across all alternatives, the highest amount of projected growth would be within the Downtown Regional Center and First Hill/Capitol Hill Regional Center. Alternative 5 has the highest housing growth ~~target~~ among the five alternatives. As a result, the proportion of city-wide growth that would be located in close proximity to transportation-related emissions is the lowest (39%) under this alternative while the total amount of collective growth would be the greatest. Only a portion of each center or village is within the 1,000-feet buffer, so the potentially affected portion of the new residents would be smaller. Alternative 5 would place a~~the~~ greater~~est~~ number of units within the 1,000-foot buffer when compared to ~~the other a~~Alternatives 1 through 4 and would place fewer units within the 1,000-foot buffer when compared to the Preferred Alternative.

Exhibit 3.2-16. 1,000-Feet Buffer Around Freeways and Roadways with Greater than 100,000 Daily Vehicles—Alternative 5



Source: Kimley-Horn, 2023.

Greenhouse Gas Emissions

GHG emissions under development of Alternative 5 were calculated using the same methodologies as those described for Alternative 1 but reflect the land use differences of increased density of residential development in the regional centers, urban centers, neighborhood centers, and urban neighborhood areas. Operational GHG emissions from Alternative 5 are presented in **Exhibit 3.2-17** and **Appendix D**. Transportation emissions from ~~target~~ growth associated with Alternative 5 would be the greatest out of all five alternatives and would result in increases in transportation emissions in comparison with existing conditions. However, due to increased density of residential development, the Alternative results in a reduction in per capita VMT. Alternative 5 results in per capita GHG emissions of 1.93~~0.49~~ $MTCO_2e$, see **Exhibit 3.2-17**. Therefore, while Alternative 5 results in the same ~~highest~~ (and highest) overall housing growth as the Preferred Alternative ~~and VMT~~, Alternative 5 would result in lower VMT (resulting in lower transportation-related emissions), ~~resulting in the highest GHG emissions associated with transportation,~~ building energy, and waste compared to the Preferred Alternative and ~~the other alternatives,~~ per capita emissions would be the lowest.

Exhibit 3.2-17. Per Capita GHG Emissions—Alternative 5

	Emissions ($MTCO_2e$)
Transportation	176
Buildings	406,041~~52,785~~
Waste	67,917
Total Alternative 5	**474,134**~~120,878~~
Population Growth Estimate	246,000
Per Capita GHG Emissions	**1.93**~~0.49~~

Notes: Population growth calculated using City GIS data for total housing units and population (total units/population = persons per household), assuming 2.05 persons per household
Source: Kimley-Horn, 2024~~3~~.

130th/145th Station Area

Under Alternative 5, an urban center designation on both the west and east sides of the 130th Station Area would merge with an existing commercial node to expand residential mixed use near the station. Growth would be accommodated in more mixed-use buildings, providing greater housing types in buildings with heights of up to 95 feet. Implementation of Alternative 5 assumes a growth potential of 2,703 housing units, which is greater than all other alternatives.

Construction

Station Area growth under Alternative 5 would be the greatest compared to all other alternatives. Therefore, emissions associated with heavy-duty construction equipment, trucks, worker vehicles, and fugitive dust would likely be the highest among all alternatives.

Operations

Criteria Pollutant Emissions

Increased growth potential within urban centers combined with improvements to transit service and connectivity provided by the stations associated with Alternative 5, when compared with all the other alternatives, would result in greatest potential for per capita VMT reduction and reductions in criteria pollutant emissions.

Greenhouse Gas Emissions

As stated above, Station Area growth under Alternative 5 would result in the greatest potential for VMT reduction and reductions in transportation-related GHG emissions. However, Station Area growth would be the highest under Alternative 5, likely resulting in the highest emissions related to building energy consumption and solid waste generation.

Equity & Climate Vulnerability Considerations

The 130th/145th Station Area is located in northern Seattle in Area 2. I-5 transects this area going north-south, and a railway runs through the vicinity of the 130th Street Light Rail Station. ~~Target g~~Growth under Alternative 5 within the Station Area would be the greatest compared to all other alternatives and would potentially place the greatest number of residents within close proximity to transportation-related pollutants along I-5.

Impacts of Preferred Alternative

Note: The impacts analysis for the Preferred Alternative was added since the Draft EIS.

The Preferred Alternative anticipates an increase in supply and diversity of housing across Seattle similar to Alternative 5. It includes the strategies for encouraging housing growth in the other action alternatives plus some additional changes to existing center boundaries and changes to place type designations beyond Alternative 5 (see **Exhibit 2.4-28**). Like Alternative 5, the Preferred Alternative anticipates the largest increase in supply of housing units within the City. As with Alternative 5, the target housing growth under this alternative is 120,000 dwelling units.

Construction

The Preferred Alternative would result in a greater number of demolished units than any other Alternative. The Preferred Alternative would result in the greatest growth compared to any other alternative except for Alternative 5, which would have the same growth. Therefore, emissions associated with heavy-duty construction equipment, trucks, worker vehicles, and fugitive dust would likely be the same or greater than the other alternatives.

Operations

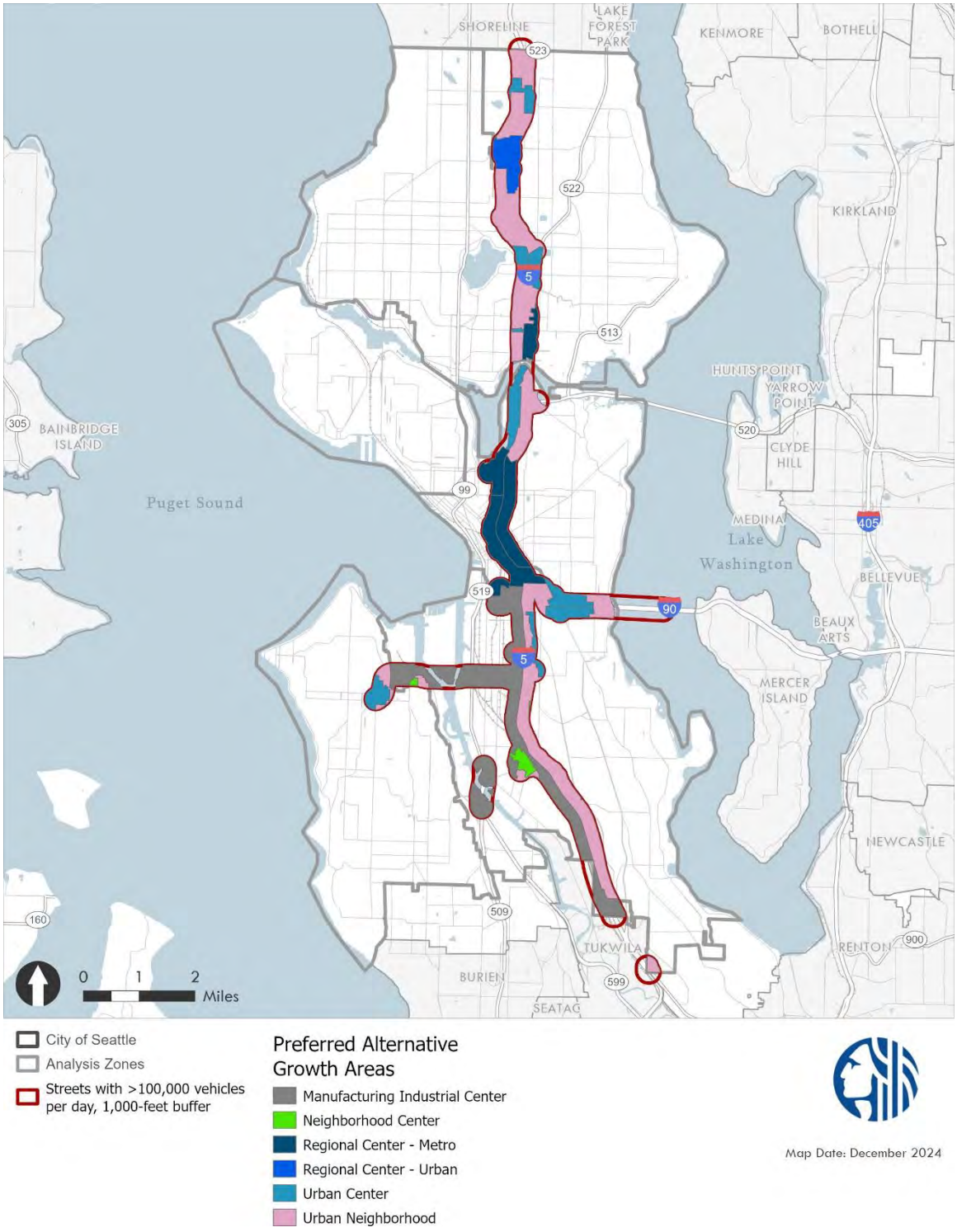
Transportation Air Quality Emissions

Transportation-related air pollutant emissions under existing conditions and each of the alternatives with VMT data are presented in **Exhibit 3.2-7** and **Appendix D**. Growth under Alternative 5 and the Preferred Alternative would be the same. The difference in the allocation of growth results in differing trip patterns and VMT. VMT under the Preferred Alternative would be approximately 0.38% greater than Alternative 5; this is due to the similar growth as Alternative 5 but an associated evaluation of transportation improvements in the Transportation Element. Preferred Alternative emissions have been estimated by increasing Alternative 5 emissions by 0.38%. As can be seen from **Exhibit 3.2-7**, emissions of VOC, CO, and NO_X under the Preferred Alternative would be substantially less than under existing conditions. This is because the projected improvement in fuel economy, increase in ZEV use, emission controls and fuel composition will outweigh the projected increase in VMT. This would result in a beneficial future air quality outcome. As indicated in **Exhibit 3.2-7**, transportation emissions from the Preferred Alternative, like Alternative 5, would be higher than those from any other alternative, mostly because the Preferred Alternative and Alternative 5 have the highest housing and jobs targets, resulting in the highest VMT, compared to all other alternatives.

Equity & Climate Vulnerability Considerations

This alternative would place the emphasis for growth near transit centers, with the 130th Street station designated as an urban center. In addition, additional neighborhood center dwelling units would be located in close proximity to transportation-related emissions as shown in **Exhibit 3.2-18**. Consistent across all alternatives, the highest amount of projected growth would be within the Downtown Regional Center and First Hill/Capitol Hill Regional Center. The Preferred Alternative and Alternative 5 have the highest housing growth among the alternatives. As a result, the proportion of city-wide growth that would be located in close proximity to transportation-related emissions (40%) is lower than all alternatives except for Alternative 5 (39%). Only a portion of each center or village is within the 1,000-feet buffer, so the potentially affected portion of the new residents would be smaller than 40%. The Preferred Alternative would place the greatest number of units within the 1,000-foot buffer as compared to the other alternatives.

Exhibit 3.2-18. 1,000-Feet Buffer Around Freeways and Roadways with Greater than 100,000 Daily Vehicles—Preferred Alternative



Source: Kimley-Horn, 2024.

Greenhouse Gas Emissions

GHG emissions resulting from development of the Preferred Alternative were calculated using the same methodologies as those described for Alternative 5 but reflect the differences in housing unit types. Operational GHG emissions from the Preferred Alternative are presented in **Exhibit 3.2-19**Exhibit 3.2-17 and **Appendix D**. Growth under Alternative 5 and the Preferred Alternative would be the same. The difference in the allocation of growth and evaluation of transportation improvements in the Transportation Element results in differing trip patterns and VMT. VMT under the Preferred Alternative would be approximately 0.38% greater than Alternative 5. Preferred Alternative emissions have been estimated by increasing Alternative 5 emissions by 0.38%. Transportation emissions from growth associated with the Preferred Alternative would be the greatest out of all alternatives and would result in increases in transportation emissions in comparison with existing conditions. Due to increased density of residential development compared to existing conditions, the Preferred Alternative results in a reduction in per capita VMT. The Preferred Alternative results in per capita GHG emissions of 1.97 $MTCO_2e$, see **Exhibit 3.2-19**. While the Preferred Alternative results in the same (and highest) overall housing growth as Alternative 5, the Preferred Alternative would result in greater transportation-related emissions due to the allocation and distribution of growth (resulting in higher VMT) and greater emissions associated with building energy and waste due to differing growth by housing types compared to Alternative 5. As such, per capita emissions under the Preferred Alternative would be slightly higher than Alternative 5 and lower than Alternatives 1 through 4.

Exhibit 3.2-19. Per Capita GHG Emissions—Preferred Alternative

	Emissions ($MTCO_2e$)
Transportation	294
Buildings	415,152
Waste	69,683
Total Preferred Alternative	**485,128**
Population Growth Estimate	246,000
Per Capita GHG Emissions	**1.97**

Notes: Population growth calculated using City GIS data for total housing units and population (total units / population = persons per household), assuming 2.05 persons per household.
Source: Kimley-Horn, 2024.

130th/145th Station Area

Under the Preferred Alternative, similar to Alternative 5, an urban center designation on both the west and east sides of the 130th Station Area would merge with an existing commercial node to expand residential mixed use near the station. Growth would be accommodated in more mixed-use buildings, providing greater housing types in buildings with heights of up to 85

feet. Implementation of the Preferred Alternative assumes a growth potential of 2,152 housing units, which is similar to Alternative 2.

Construction

Station Area growth under the Preferred Alternative would be similar to Alternative 2. Therefore, emissions associated with heavy-duty construction equipment, trucks, worker vehicles, and fugitive dust would be similar to Alternative 2.

Operations

Criteria Pollutant Emissions

Increased growth potential within urban centers combined with improvements to transit service and connectivity provided by the stations associated with the Preferred Alternative would result in greater potential for per capita VMT reduction. Reductions in criteria pollutant emissions under the Preferred Alternative, similar to Alternative 5, would be the greatest when compared with Alternatives 1 through 4.

Greenhouse Gas Emissions

As stated above, Station Area growth under the Preferred Alternative, would result in greater potential for VMT reduction and reductions in transportation-related GHG emissions. In addition, Station Area growth would be similar to Alternative 2, likely resulting in similar emissions related to building energy consumption and solid waste generation (lower than Alternative 5).

Equity & Climate Vulnerability Considerations

The 130th/145th Station Area is located in northern Seattle in Area 2. I-5 transects this area going north-south, and a railway runs through the vicinity of the 130th Street Light Rail Station. Growth under the Preferred Alternative within the Station Area would be similar to Alternative 2 and would potentially place a similar number of residents within close proximity to transportation-related pollutants along I-5 (less than Alternative 5).

3.2.3 Mitigation Measures

Incorporated Plan Features

Under the action alternatives, the City will update its Comprehensive Plan policies for land use, transportation, and others with an opportunity to increase residential compatibility in proximity to major air emission sources.

Regulations & Commitments

Air Quality

Several federal, state, and regional regulations or efforts apply to construction and allowed land uses:

- NAAQS: As described above, the EPA established NAAQS and specifies future dates for states to develop and implement plans to achieve these standards.
- Washington State: Ecology established state ambient air quality standards for the same size pollutants (CO, VOCs, NO_2, PM, SO_2, and ozone) that are at least as stringent as the national standards.
- PSCAA Regulations: All construction sites in the Puget Sound region are required to implement emission controls to minimize fugitive dust and odors during construction, as required by PSCAA Regulation 1, Section 9.15, Fugitive Dust Control Measures.

  PSCAA manages permitting of stationary air pollutant sources and all industrial and commercial air pollutant sources in the Puget Sound region are required to register with the PSCAA.

Greenhouse Gases & Climate Change

- Washington State Clean Buildings Performance Standard (CBPS): The legislature passed clean building laws in 2019 (HB 1257) and 2022 (SB 5722) to create an energy performance standard for non-residential buildings larger than 50,000 square feet and require energy management planning, operations and maintenance and tracking energy use over time for non-residential buildings larger than 20,000 square feet and multifamily buildings over 50,000 square feet.
- ~~Washington State~~ Energy Code**s**: Development in the study area would be subject to the applicable requirements of the Washington State Energy Code and the Seattle Energy Code, which regulate~~s~~ the energy-use features of new and remodeled buildings.
- The City's 2013 CAP and the 2018 Climate Strategy include strategies and actions to limit atmospheric warming to 1.5 degrees Celsius. The strategies and actions focus on road transportation and building energy, which comprise the majority of local emissions, and which are the dominant sources of GHG emissions in the City.
- All buildings with 50,000 square feet or more of nonresidential space (excluding parking) must comply with the Building Tune-Ups requirement every five years (Seattle Municipal Code 22.930). Building Tune-Ups involve assessment and implementation of operational and maintenance improvements to achieve energy (and water) efficiency, which helps to reduce GHG emissions.
- ~~The City of Seattle Building Energy Code eliminates the use of fossil fuels like gas and electric resistance from most water heating and space heating systems in new construction and substantial alterations for commercial and multifamily uses.~~
- Seattle's Energy Benchmarking Law (Seattle Municipal Code 22.290) requires the owners of non-residential and multifamily buildings (20,000 square feet or larger) to track and report (annually) energy performance.

- Seattle's Transportation Electrification Blueprint includes initial steps for reducing climate pollution in the transportation sector. Goals include 100% of shared mobility being zero emission, 90% of all personal trips to be zero emission by 2030, 30% of goods delivery to be zero emission, 100% of City fleet to be fossil-fuel free, and electrical infrastructure.
- ~~A~~The action alternatives provide for a new Climate Element in the One Seattle Comprehensive Plan addressing GHG reduction policies and climate resilience policies.

Other Potential Mitigation Measures

Although mitigation strategies are not required due to a lack of significant adverse impact findings, to address the potential exposure of residences and other sensitive land uses to air toxic risk areas, discussion of potential mitigation measures is included below.

Transportation-Related Emissions

Transportation-related emissions make up a large portion of criteria pollutant emissions. On-road mobile sources account for approximately half of the overall CO and NO_X emissions within King County (U.S. EPA, 2017). Improvements in fuel efficiency combined with reductions in VMT would contribute to reductions in all criteria pollutant emissions. Replacing fossil-fueled vehicles with ones powered by renewable or cleaner sources of energy (electric, hydrogen, etc.) would result in reductions in CO, NOx, and VOCs.

Vehicle Miles Traveled

Potential VMT-reduction strategies are discussed below.

- **Pedestrian Facilities.** A household activity survey conducted by the Puget Sound Regional Council (PSRC) in 2006 tested the effect of sidewalks on travel patterns and the relationship between sidewalk availability and VMT (SDOT and WSDOT, 2011). Results of the study provide evidence that sidewalk availability combined with land use mix was associated with reduced VMT.
- **Bicycle Improvements.** According to the NCST, bicycle infrastructure has the potential to reduce VMT by encouraging a shift from driving (NCST, 2017). The U.S. EPA estimates that bicycle paths/lanes/routes would provide less than 0.1% reductions in VMT (U.S. EPA, 2014).
- **Transit Improvements.** Transit has been identified as the most frequent and successful tool in reducing VMT (WSDOT, 2022). Transit improvements overall provide a VMT reduction of up to 2.6% (U.S. EPA, 2014).
- **Congestion Pricing, Roadway Fees, and Tolls.** Congestion pricing includes the use of fees for the specific purpose of reducing congestion, such as during peak periods of congestion. Examples include roadway fees and tolls. Congestion pricing has the potential to reduce VMT by approximately 10 to 44% (SDOT, 2019).

- **Land Use Mix and Compactness.** A mix of land uses together with more compact development around transit is associated with reduced VMT (WSDOT, 2022). Diversity in land uses combined with increased density within an urban area can lead to shorter trip distances and greater use of walking, as well as the reduced need for vehicle ownership. Access to a variety of trip purposes may induce additional trips; however, these trips are shorter and are more likely to be made by walking than trips in areas where mixed land uses are not available.

Electric Vehicles

Electric vehicles (EVs) do not create tailpipe emissions (U.S. EPA, 2021). Replacement of gasoline- and diesel-fueled vehicles with EVs would reduce tailpipe emissions within the City of Seattle. However, fugitive dust emissions from brake wear and tire wear would remain the same. Implementation of the Seattle Comprehensive Plan does not directly affect the percentage of EVs within the City. However, implementing goals for EV use including increased charging infrastructure would facilitate and encourage future EV adoption. A combination of charging infrastructure and incentives would encourage electric vehicles in private and public fleets (PSRC, 2020). One of the main barriers to EV adoption is the lack of off-street parking for charging (City of Seattle, 2014). Increased EV penetration would require an expansion of charging options for those without access to charging facilities in their home. Seattle City Light is currently investing in grid upgrades and EV charging infrastructure to enable a rapid transition to an electrified transportation system (SCL, 2023), including Level 2 EV chargers at curbside locations offering service to residents who cannot access off-street parking to charge their vehicles (SCL, 2023). The City could adopt regulations to support the placement of infrastructure for charging electric vehicles in applicable new developments (including commercial and industrial).

Building-Related Emissions

Building energy emissions are a large source of GHG emissions. Decarbonization of buildings by eliminating the combustion of natural gas and other fossil fuels would reduce residential and commercial building emissions (CARB, 2022). ~~All-electric space and water heating is required by the 2022 Washington Energy Code. However, all-electric cooking appliances have not been required. Combined with increasing energy efficiency, building electrification in new buildings would reduce building-related emissions.~~

To lower the GHG contribution from industrial and commercial uses, policies that encourage or mandate new construction projects in the City to incorporate any of the following into their design:

- ~~Achieve one of the following green building standards: Leadership in Energy and Environmental Design (LEED) in Motion: Industrial Facilities, Built Green, the Living Building Challenge, or the Evergreen Sustainable Development Criteria.~~
- Use low-embodied carbon construction material types, such as low-carbon concrete mixes.

- Limit carbon-intensive materials or incentivize use of lower carbon alternatives such as a wood structure instead of steel and concrete, or agricultural products that sequester carbon.
- Salvage materials like brick, metals, broken concrete, or wood.
- Use high-recycled content materials.
- Prioritize adaptive reuse for existing buildings to avoid additional embodied carbon emissions.

Residential Strategies

On-road, railway, port, and aviation activity are main sources of pollutant emissions. The following strategies can reduce the potential levels of air toxics:

- Where the City has authority to do so, the designation of truck routes serving industrial and manufacturing areas away from residential areas would increase buffer areas between some residential neighborhoods and roadways highly travelled by diesel trucks.
- Add denser tree canopy near high-volume roadways and industrial areas, specifically a double-row of long-needle conifers allowing no line-of-site.
- Incorporate standards for more frequent street sweeping to reduce roadway dust associated with increased VMT on high-travelled roadways within 1,000 feet of residential uses.
- Consider zoning standards that identify location, building, and site design provisions that support reduced exposure to potential air toxics.

Improved Air Filtration

The City could adopt new development standards that require or incentivize enhanced air filtering and circulation to address transportation-generated particulates for residences and other sensitive uses (e.g., schools, daycare, hospitals, etc.). For sensitive lands uses in close proximity to industrially zoned areas or highways or other high-traffic roadways, ventilation systems that are capable of filtering fine particulate pollutants (from industrial or transportation sources) could be integrated into HVAC systems to improved indoor quality and reduce exposure to air contaminants. Ventilation systems with a higher Minimum Efficiency Reporting Value (MERV) are capable of removing finer particulate matter from indoor air. Specifically, U.S. EPA recommends higher efficiency filters with a MERV rating of 13 or higher for HVAC filtration (U.S. EPA, 2023). The 2016 ASHRAE handbook for HVAC Systems and Equipment includes air cleaners with MERV ratings in the E-2 range (MERV 9 -12) for application in better residential and industrial air cleaning, which are effective for particulates in the 1.0 to 3.0 μm size range, while those in the E-1 range (MERV 13 – 16) control finer particulates (ASHRAE, 2016).

130th/145th Station Area

Alternatives 2 and 5 and the Preferred Alternative would introduce increases in population within the Station Area, to take advantage of the reduction in emissions inherent to transit-

oriented development. Transit-oriented development is a key strategy for achieving the City's goal to be carbon neutral by the year 2050. However, because the area is also adjacent to heavily used roadways, such as I-5, increasing residential densities in the Station Area could result in increasing the number of residents potentially exposed to elevated levels of air toxics. As shown in **Exhibit 3.2-6,** I-5 is a heavily traveled roadway, with greater than 100,000 vehicles per day. The following strategies can reduce the potential levels of air toxics at residential uses within the Station Area:

- Incorporation of development standards including requirements for enhanced air filtration and circulation for residential units within the Station Area and site intake vents as far from substantial sources as practicable.
- Building design strategies to minimize the number of residential units facing I-5.
- Planting of trees along streets with residential development and along commercial corridors including but not limited to the reforestation plan for the Lynnwood Link Extension.
- Restrict open spaces such as balconies near the source of toxic air contaminants.
- Restrict operable windows near sources of toxic air contaminants.

3.2.4 Significant Unavoidable Adverse Impacts

No significant unavoidable adverse impacts to air quality and greenhouse gas emissions are anticipated. Through mitigation implementation, local and state climate actions, and expected continued regulatory changes, the alternatives may result in lower GHG emissions on a per capita basis compared to existing conditions. The alternatives would not prevent or deter statewide, regional, or local efforts to reduce GHG emissions. While each alternative would generate GHG emissions from growth and development within the city, the benefit of channeling development to targeted areas that might otherwise occur in peripheral areas of the city or region could serve to offset these impacts.

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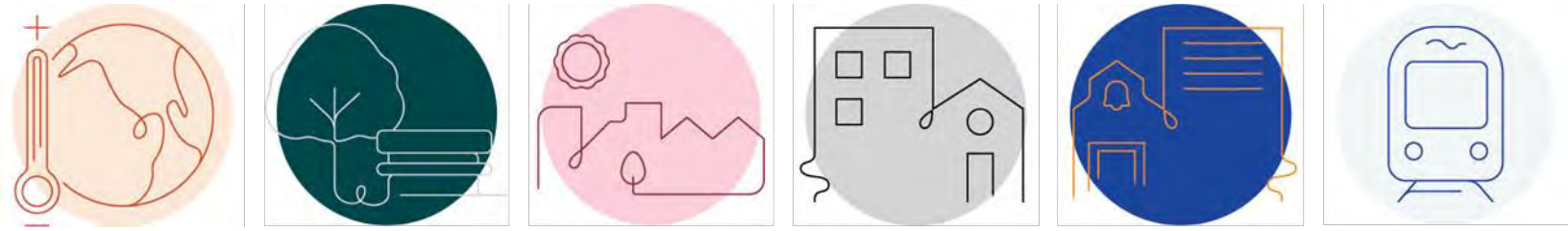
3.3 Plants & Animals



Alki Beach Park. Source: City of Seattle, 2023.

Discussions in this section evaluate, at a broad, programmatic level, the potential impacts of the One Seattle Comprehensive Plan Update proposal and alternatives on plants and animals.

Analyses in this EIS consider all plants and animals that may be affected by the alternatives, with particular emphasis on tree canopy cover and on streams that may receive stormwater runoff from pollution-generating impervious surfaces. This emphasis reflects heightened concern about those two elements of the environment. During the public scoping process, many stakeholders expressed concern about the loss of tree canopy cover in the city. With regard to stormwater, a growing field of research is finding that stormwater runoff contains contaminants that are harmful to fish, including species that are listed as threatened or endangered under the Endangered Species Act (ESA).

Thresholds of significance utilized in this impact analysis include:

- Impacts that would reduce the likelihood that populations of native plant or animal species would persist in or near Seattle~~of survival or recovery of a plant or animal species in the wild~~, compared to the No Action Alternative;
- A substantially increased potential for tree canopy cover loss, compared to the No Action alternative; and
- An appreciable increase in the delivery of stormwater contaminants to fish-bearing streams, compared to the No Action alternative.

Proposals studied in this EIS are focused on a new growth strategy, particularly housing, while employment is fairly constant across alternatives. For the manufacturing industrial centers, employment growth was considered in relation to plants and animals including aquatic and terrestrial species in the Seattle Industrial and Maritime Lands Final EIS, completed September 29, 2022. That Final EIS is hereby incorporated by reference, in particular **Section 3.3 Plants & Animals**.[18]

3.3.1 Affected Environment

The following subsections provide overviews of general concerns relating to plants and animals citywide, with special attention to tree canopy cover and contaminants in stormwater runoff. These overviews are followed by brief descriptions of the tree canopy cover and the presence of fish-bearing streams in the eight analysis subareas and the 130th and 145th Street Station Area.

Citywide

Habitats in Seattle support a wide range of plant and animal communities. The abundance and diversity of species in any given area vary with the degree of urban development. More intensely developed areas (parcels dedicated to commercial and/or industrial uses, for example) generally have little vegetative cover and support a comparatively small number of wildlife species that are adapted to high levels of human activity. Many of the plants and

[18] See project documents, available: https://www.seattle.gov/opcd/ongoing-initiatives/industrial-and-maritime-strategy#projectdocuments.

animals in such areas are not native to the region. More diverse assemblages of plants and animals, including native species, may be found in less-developed areas—parks and open spaces, for example. Trees offer structural diversity that provides habitat for a wide range of species; areas in the city with extensive tree canopy cover are likely to support comparatively diverse plant and animal communities. Parks and undeveloped stream corridors may provide movement corridors for mammals and amphibians.

Many residential areas include trees and other vegetation (native or non-native) interspersed with buildings and impervious surfaces. These conditions generally support plant and animal communities that are intermediate between intensely developed areas and parks and open spaces, in terms of diversity and abundance. At the scale of an individual parcel, as the proportion of a lot that is occupied by buildings and impervious surfaces increases, the amount of vegetative cover—and, by extension, the lot's capacity to help support diverse and abundant communities of plants and animals—typically decreases.

The plant and animal species found in Seattle are widespread in the region.~~; s~~Some of these species are globally abundant; populations of some species are declining. For species associated with certain habitat types (e.g., heavily vegetated residential lots), urban development and redevelopment have the potential to contribute to further declines. Areas in the city limits represent a very small proportion of the total amount of habitat available to any given species. ~~The only~~ ESA-listed Chinook salmon and steelhead ~~or state-listed species known or expected to~~ are present in some streams ~~use habitats~~ in the city ~~are fish (steelhead and Chinook salmon)~~. These and other ESA-listed and state-listed species are also present in marine waters that receive stormwater runoff from the city, including bull trout, rockfish, marbled murrelets, and Southern Resident killer whales.

Tree Canopy Cover

Canopy cover is the percentage of the city's land area that is covered by trees, as seen in an aerial view. Canopy cover is an important management tool for planners to understand the extent and distribution of trees in Seattle. The city's goal, established in 2007, is to have 30% tree canopy cover by 2037.

Trees are critical infrastructure that provide essential benefits, including the following:

- Sequestering carbon (i.e., capturing and storing carbon dioxide from the atmosphere, reducing the input of a key greenhouse gas)
- Providing shade and reducing heat
- Absorbing pollution
- Improving physical and mental health
- Providing habitat for plants and animals
- Intercepting a portion of rainfall, reducing overall stormwater runoff

Trees play a vital role in moderating temperatures in urban areas. Tree canopy provides cooling both through shading and through evapotranspiration. Shading blocks incoming heat energy and prevents impervious surfaces from absorbing it and radiating back into surrounding areas. Evapotranspiration is the process by which plants absorb water through

their roots and release it as vapor through their leaves. This process of converting liquid to gas uses heat from surrounding areas and thus cools the air. In general, areas with more canopy cover have cooler temperatures, compared to areas with less canopy cover. Increasing canopy in low-canopy neighborhoods is a critical aspect of the City's long-term heat preparedness strategy (Seattle Office of Sustainability & Environment 2022).

In 2022, the Seattle Office of Sustainability & Environment completed a citywide review of tree canopy cover. The study used lidar data to determine the extent of tree canopy cover in 2016 and 2021 and to identify areas where cover increased or decreased during that 5-year period. The study also identified parcels that were redeveloped during that period, to allow an assessment of the amount of canopy change that might be attributable to housing projects versus other causes. Sites were considered redeveloped if they included any new housing units.

Key findings of the canopy cover assessment included the following:

- Canopy cover decreased by 255 acres between 2016 and 2021—an area roughly the size of Green Lake. As canopy cover decreases, the benefits identified above are diminished.
- The city is below its goal for canopy cover. Total cover in 2021 was 28%, compared to a goal of 30%.
- Loss is happening inequitably. Neighborhoods impacted by racial and economic injustice started with less canopy and lost more than the citywide average.
- The greatest net losses occurred in parks and natural areas and on residential parcels where development projects did not occur.
- Climate change poses serious challenges for trees, while also making trees more essential. Climate change brings new pests and diseases, along with increased watering and maintenance needs. At the same time, trees are critical climate infrastructure, protecting us from extreme heat and improving air quality.

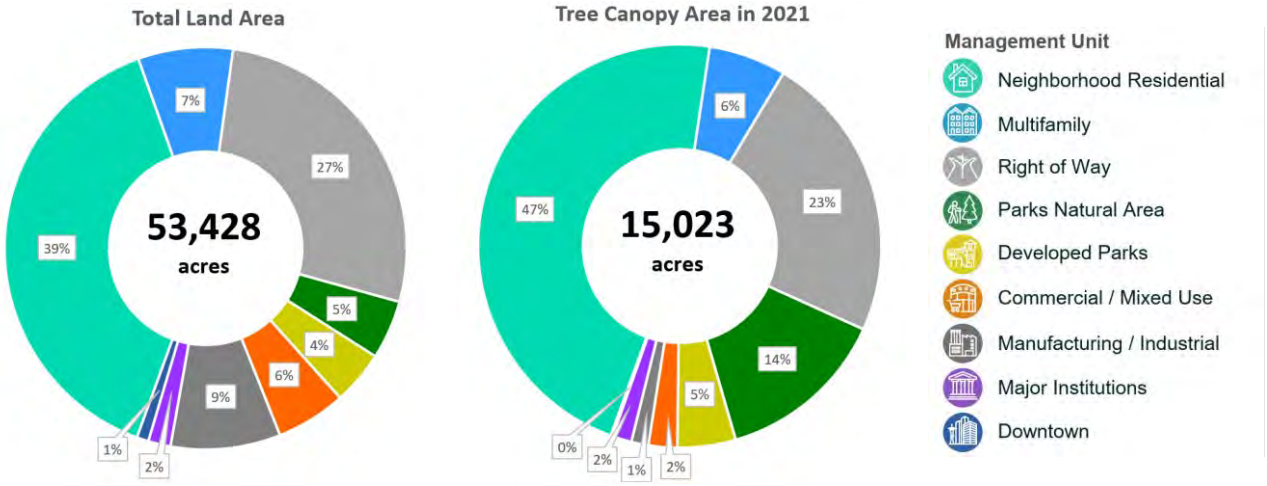
Many factors contributed to citywide losses of tree canopy cover during the study period. Examples include:

- Natural mortality: in any urban forest, a certain portion of trees are likely to die or be removed as they become hazardous. As trees age, they are more likely to lose large branches, become hazardous, or succumb to pests, disease, or drought stress.
- Climate change: hotter, drier summers exacerbate drought stress.
- Forest management: in some parks and natural areas, aging deciduous trees are dying or being removed to allow for the establishment of conifers that provide more ecosystem benefits. Invasive species are also making it difficult for new trees to establish themselves.
- Public safety: in some areas, aging or unhealthy trees pose a risk to residents or park users and must be removed.
- Competing uses: trees are removed due to resident preferences, residential and commercial development projects, and infrastructure changes such as transportation and utilities.

These losses were partially offset by gains as existing trees grew taller and broader. Trees less than 8 feet tall were excluded from the analysis, so most newly planted trees were not factored into the calculation of tree canopy gains.

The tree canopy cover assessment divided the city into nine management units, based on land uses. The different management units have different proportions of tree canopy cover (**Exhibit 3.3-1**). For example, only 5% of the city is in the Parks and Natural Areas management unit, but 14% of the city's tree canopy cover is in that management unit. Conversely, the management units that support more high-intensity land uses (Commercial/Mixed Use, Manufacturing/Industrial, Major Institutions, Downtown) represent more than 17% of the city's total land area but provide only 5% of the tree canopy cover. The Neighborhood Residential management unit encompasses the largest proportion of the city's total land area, and it provides an even larger proportion of the city's tree canopy cover (**Exhibit 3.3-1**).

Exhibit 3.3-1. Land Area and Tree Canopy Cover, by Management Unit

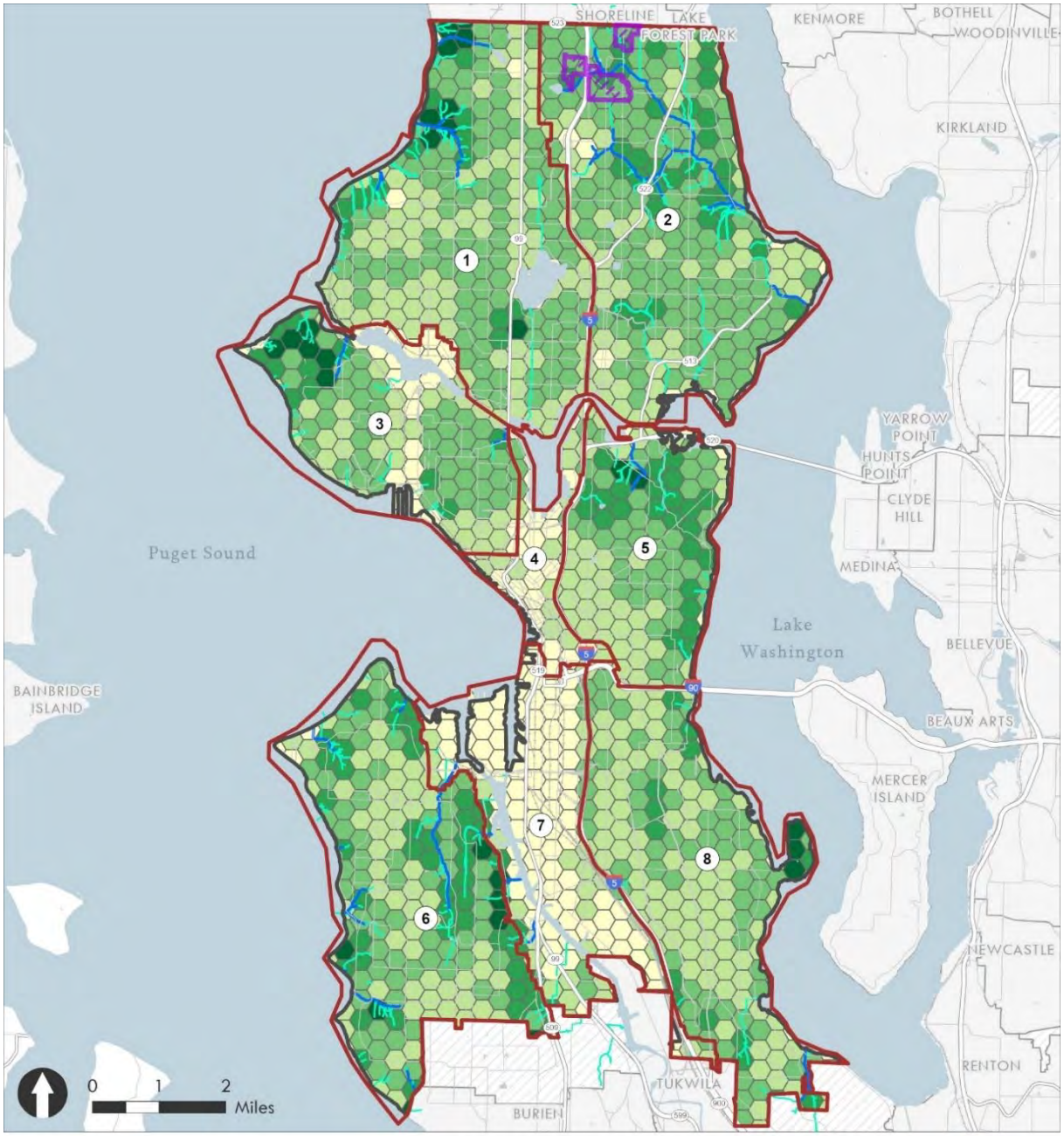


Source: Seattle Office of Sustainability & Development, 2022.

Trees in public rights-of-way play an important role in contributing to canopy cover citywide. Rights-of-way make up 27% of the city's land area, and trees in this management unit contribute 23% toward the city's canopy cover—second only to the Neighborhood Residential management unit (**Exhibit 3.3-1**). Given the constraints of limited space and soil volume that planting strips can provide, trees in this management unit face extra challenges. Soil quality can also be a challenge, particularly in areas that have been used for parking or other activities that compact soil (Seattle Office of Sustainability & Development 2022). These challenges mean that frequent maintenance and care for existing trees in rights-of-way is essential. Most trees in the Right of Way management unit (around 84%) are privately managed by adjacent landowners; the remainder are managed by the City (Seattle Office of Sustainability & Development 2022).

Broadly speaking, the areas with the greatest proportion of tree canopy cover are in and near parks and natural areas, particularly those near the shorelines of Lake Washington and Puget Sound (**Exhibit 3.3-2**). Forested areas are also present in ravines and along the steep slopes of the city's major hills, such as Magnolia, Queen Anne Hill, Beacon Hill, Boeing Hill, and West Seattle. Tree canopy is largely absent from Downtown and major industrial areas along the Duwamish Waterway and in Interbay.

Exhibit 3.3-2. Existing Tree Canopy Cover in Seattle



Sources: Seattle Office of Sustainability & Development, 2022; Washington Department of Natural Resources, 2023.

Between 2016 and 2021, tree canopy cover decreased in all management units except Downtown, where it remained essentially unchanged (**Exhibit 3.3-3**). The greatest acreage of canopy loss—more than three-quarters of the total loss—occurred in the Parks and Natural Areas and Neighborhood Residential management units. Notably, most canopy loss was not associated with development activities; only 14% of the canopy loss occurred on parcels that underwent development during that period (**Exhibit 3.3-3**). Of the approximately 35 acres (14% of 256 acres) of canopy loss that occurred on parcels that underwent development, almost all (31 acres) happened on parcels in the Neighborhood Residential or Multifamily management units. In 2023 (i.e., after the tree canopy study was completed), the city's tree ordinance was updated (see **Section 3.3.3**). It is anticipated that these updates will decrease the rate of canopy loss associated with residential and commercial development.

Exhibit 3.3-3. Total Area and Proportion of Tree Canopy Loss on Parcels That Underwent Development, by Management Unit

Management Unit	Tree Canopy Loss, 2016-2021 (acres)	Percentage of That Loss Occurring on Parcels That Underwent Development
Neighborhood Residential	87	19%
Multifamily	19	75%
Right of Way	10	1%
Parks and Natural Areas	111	0%
Developed Parks	5	0%
Commercial/Mixed Use	6	63%
Manufacturing/Industrial	6	7%
Major Institutions	12	0%
Downtown	0	0%
Total	**256**	**14%**

Source: Seattle Office of Sustainability & Development, 2022.

Of the 511 acres that underwent development during the study period, 291 acres (57%) were on parcels in the Multifamily or Neighborhood Residential management units. However, those two management units saw 88% of the total tree canopy loss on parcels that underwent development (31 of 35 acres). Most of the remaining 12% of development-related canopy loss happened on parcels in the Commercial/Mixed Use management unit (Seattle Office of Sustainability & Development 2022).

The disproportionate amount of development-related canopy loss on Multifamily and Neighborhood Residential parcels may be a product of the greater amount of tree canopy cover in those management units. In 2021, the total canopy cover for areas in the combined Multifamily and Neighborhood Residential management units was approximately 32%; canopy cover for areas in the Commercial/Mixed Use management unit was 11% (Seattle Office of Sustainability & Development 2022). Parcel size may also play a role. On average, Multifamily

and Neighborhood Residential are smaller than Commercial/Mixed Use parcels. Logistical constraints make it difficult to avoid impacts to trees when developing a small parcel.

Notably, more than 80% of the canopy loss that occurred in the Neighborhood Residential management unit happened on parcels where development did not take place (**Exhibit 3.3-3**). This may indicate that much of the canopy loss in the Neighborhood Residential management unit resulted from natural mortality or from actions (e.g., pruning, tree removal) unrelated to development activities.

The City aims to prioritize urban forestry efforts in low-canopy areas. Many of these areas also have disadvantaged populations, as indicated by race, language, origin, socioeconomic conditions, and health issues. The 2022 City of Seattle Tree Canopy Assessment also found that, in 2016, areas with disadvantaged populations had 16% less canopy cover than other areas. The disparity was exacerbated by canopy loss between 2016 and 2021. By 2021, areas with disadvantaged populations had 20% less canopy cover than other areas.

Residential areas with a combination of disadvantaged populations and low canopy cover are primarily in Area 4 (Belltown, International District, South Lake Union), Area 6 (South Delridge and Highland Park neighborhoods), Area 7 (South Park and Georgetown neighborhoods), and Area 8 (Beacon Hill, Brighton, and Rainier Beach neighborhoods). Additional neighborhoods with that combination include Atlantic (Area 5), Bitter Lake (Area 1), and Greenwood (Area 1).

Stormwater Runoff

Since the 1990s, biologists studying salmon in urban streams have documented alarmingly high numbers of coho salmon dying before being able to spawn (e.g., McCarthy et al. 2008). Studies in several Seattle-area streams (including Longfellow, Thornton, Piper's, Taylor, and Fauntleroy creeks) have found rates of pre-spawning mortality in excess of 86% (Scholtz et al. 2011). More recent research has found 6PPD-quinone, a contaminant originating in vehicle tires and found in runoff from roadways, to be a major contributor to pre-spawning mortality in coho salmon (Tian et al. 2021). Other contaminants, such as metals and polycyclic aromatic hydrocarbons, are also associated with adverse effects on salmonids and their prey. Contaminants in stormwater runoff have also been found to have harmful effects on ESA-listed Chinook salmon and steelhead (National Marine Fisheries Service 2022).

Some types of stormwater treatment facilities, such as bioretention facilities, prevent the acute lethal effects of stormwater on salmonids (Spromberg et al. 2015). Other types of facilities, such as compost-amended bioswales, are also effective at removing a variety of contaminants from runoff, including metals and polycyclic aromatic hydrocarbons (Fardel et al. 2020; McIntyre et al. 2015). However, residual contaminants in stormwater runoff can still harm fish, even after the water has been treated to reduce pollutant loads. In addition, the capacity of treatment facilities may be exceeded during major storm events, and untreated stormwater may bypass the facilities.

Based on the above, the discharge of stormwater runoff to fish-bearing streams has the potential to harm fish, including ESA-listed species. Terrestrial wildlife may also be affected by

contaminants in stormwater runoff that enters surface waters, either through direct exposure (e.g., drinking) or by consuming contaminated fish. ~~As noted above, the only ESA-listed or state-listed species known or expected to use habitats in the city are fish.~~ Directing runoff to treatment facilities reduces the risk of harm, but it may not eliminate that risk altogether.

Stormwater runoff also has the potential to affect stream flows. During storm events, rainwater rapidly runs off from impervious surfaces and into pipes and other systems that deliver the water directly to streams. This results in high-volume, rapid peak flows that damage stream habitat and contribute to erosion and sedimentation. These impacts can be reduced by directing stormwater to facilities that detain runoff and allow it to enter streams more gradually.

Section 3.1.1 in **Earth & Water Quality** identifies the streams that receive stormwater runoff from impervious surfaces (including pollution-generating surfaces) in the city. The following subsections provide information about the known or expected presence of fish in these streams. Discussions in this EIS emphasize salmonids—anadromous salmonids in particular—because these species are a management concern due to habitat degradation and population declines.

Note that stormwater runoff can enter ~~fish-bearing streams~~ surface waters that are a considerable distance away. Pipes and ditches can convey runoff for several miles, discharging contaminated water to a stream in a different area. Conversely, stormwater from many parts of the city is piped to King County's West Point Wastewater Treatment Plant in Discovery Park. Treated effluent from the plant is discharged to Puget Sound approximately 3,600 feet offshore of West Point and is extremely unlikely to contribute to pre-spawning mortality in salmonids.

Areas

The following subsections provide a general overview of tree canopy cover in each of the eight analysis subareas and the 130th and 145th Street Station Area. Discussions also identify areas of notably heavy tree canopy cover, as well as streams with documented or potential fish use.

Area 1

Northwest Seattle includes some of the most densely forested areas in the city. Parks (e.g., Golden Gardens Park, Carkeek Park), greenspaces, and residential areas along the bluffs bordering Puget Sound include several areas with more than 60% canopy cover (**Exhibit 3.3-2**). Woodland Park also includes some areas with relatively high canopy cover. Neighborhoods with moderate to high canopy cover (generally 25 to 60%) include Broadview, Bitter Lake, Blue Ridge, North Beach, Phinney Ridge, Green Lake, Fremont, and Wallingford.

Mapping provided by the Northwest Indian Fisheries Commission (NWIFC) indicates that Piper's Creek in Carkeek Park supports coho salmon and ESA-listed Chinook salmon (NWIFC 2023). Using a topography-based model, the Washington Department of Natural Resources (WDNR) identified two additional potentially fish-bearing streams in this area, both of which

are unnamed tributaries to Puget Sound (WDNR 2023). One drains westward from Bitter Lake, and the other drains northward from North Beach Park.

Area 2

Most of northeast Seattle has a relatively high proportion of tree canopy cover (generally more than 30%; **Exhibit 3.3-2**). The areas with the greatest canopy cover are in parks (e.g., Matthews Beach Park), greenspaces, and residential areas near Thornton Creek and its tributaries and along Lake Washington. Additional areas of comparatively high canopy cover include Northacres Park and Ravenna Park. Nearly all neighborhoods in Area 2 have moderate to high canopy cover. The exceptions are the neighborhoods with substantial commercial centers (e.g., Northgate, Roosevelt, University District), as well as Magnuson Park.

Almost all of northeast Seattle is in the Thornton Creek watershed. According to NWIFC (2023), Thornton Creek and its tributaries provide spawning habitat for ESA-listed Chinook salmon as well as coho and sockeye salmon. Cutthroat trout and ESA-listed steelhead have also been documented in the watershed. Chinook, coho, and sockeye salmon also have the potential to be present in Yesler Creek, a tributary to Union Bay near the western edge of the Laurelhurst neighborhood. These species are also present in Lake Washington, which receives stormwater runoff from parts of Area 2.

WDNR (2023) identifies two additional potentially fish-bearing streams in this area. One is an unnamed tributary that flows from Haller Lake to the north branch of Thornton Creek, and the other is an unnamed tributary that enters Lake Washington immediately south of Magnuson Park.

130th/145th Study Area

The 130th/145th Study Area consists of two units: an approximately 65-acre area near the intersection of 15th Ave NE and NE 145th Street and an approximately 218-acre area spanning I-5 near the Sound Transit light rail station at NE 130th Street. Both units include areas of comparatively high canopy cover near Northacres Park (NE 130th Street unit) and along the north branch of Thornton Creek near Jackson Park Golf Course (both units).

Reaches of the north branch of Thornton Creek in this area have the potential to provide habitat for Chinook, coho, and sockeye salmon. Steelhead and cutthroat trout have been documented in these reaches (NWIFC 2023).

Area 3

The West subarea includes two neighborhoods with relatively high levels of tree canopy cover (Magnolia and Queen Anne), separated by the Interbay industrial area (**Exhibit 3.3-2**). The areas with the greatest canopy cover are Magnolia bluff, Discovery Park, Kiwanis Memorial Preserve Park, Kinnear Park, and greenbelts along the western and northern slopes of Queen Anne Hill.

NWIFC (2023) does not identify any fish-bearing streams in Area 3. WDNR (2023) identifies two potentially fish-bearing streams, both of which are tributaries to the Ship Canal. One is Wolfe Creek (a small stream that flows north from Kiwanis Memorial Preserve Park), and the other is an unnamed tributary that originates on the northern slopes of Queen Anne Hill near Mayfair Park. Chinook, coho, and sockeye salmon are present in the Ship Canal, which receives stormwater runoff from parts of Area 3.

Area 4

The Downtown/South Lake Union subarea does not contain any areas with more than 10% tree canopy cover. Several species of salmonids (Chinook, coho, and sockeye salmon, steelhead, cutthroat trout) have been documented in Lake Union, which receives stormwater runoff from parts of this area (NWIFC 2023). No streams with documented or potential fish use have been identified in this area (NWIFC 2023; WDNR 2023).

Area 5

Areas with relatively high levels of tree canopy cover include Volunteer Park, Interlaken Park, Washington Park Arboretum, Frink Park, Leschi Park, and residential areas along the shores of Lake Washington. Areas dominated by commercial/mixed uses and multifamily housing (primarily west of 23rd Avenue and south of Volunteer Park) generally have less canopy cover than the rest of the subarea.

NWIFC (2023) does not identify any fish-bearing streams in Area 5. WDNR (2023) identifies one potentially fish-bearing stream in the area: an unnamed tributary to Union Bay, originating in Interlaken Park. According to NWIFC (2023), Chinook, coho, and sockeye salmon, steelhead, cutthroat trout have been documented in Lake Washington (including Union Bay and Portage Bay), which receives stormwater runoff from parts of this area.

Area 6

Areas with relatively high proportions of tree canopy cover include parks, greenspaces, and residential areas along Puget Sound and on hillslopes west of the Duwamish Waterway (**Exhibit 3.3-2**). Areas with the greatest density of canopy cover include Lincoln Park, Fauntleroy Park, the West Duwamish greenspace, and the Arroyo Heights natural area. Neighborhoods with moderate to high canopy cover include North Admiral, Riverview, Fauntleroy, Arbor Heights, and Highland Park. Areas with lower canopy cover include commercial and residential areas near the West Seattle Junction, along California Ave SW, and in the High Point and South Delridge neighborhoods.

According to NWIFC (2023), Longfellow Creek supports spawning by coho salmon. Cutthroat trout have also been documented in the stream, and Chinook salmon, chum, salmon, and steelhead could potentially use habitats in the Longfellow Creek system. With the exception of

cutthroat trout, all of these species could potentially use habitats in Puget Creek, a small stream that enters the Duwamish Waterway near the Duwamish Longhouse and Cultural Center.

The two other Area 6 streams with documented fish use are Fauntleroy Creek (coho salmon and cutthroat trout) and a small stream that enters the Duwamish Waterway near the 1st Avenue South Bridge (coho salmon). Species present in the Duwamish Waterway (which receives stormwater runoff from parts of Area 6) include Chinook, chum, coho, pink, and sockeye salmon, steelhead, and cutthroat trout.

WDNR (2023) identifies six additional potentially fish-bearing streams in Area 6:

- Fairmont Creek (a small stream that originates in the North Admiral neighborhood and drains to Elliott Bay)
- An unnamed tributary that enters the Duwamish Waterway approximately 0.5 mile north of the 1st Avenue South Bridge
- An unnamed tributary that enters Puget Sound at Seola Park in the southwestern corner of the city
- An unnamed tributary that enters Puget Sound at Lowman Beach Park north of Lincoln Park
- An unnamed tributary that enters Puget Sound approximately 0.5 mile south of Mee-Kwa-Mooks Park
- An unnamed tributary that originates in Schmitz Preserve Park and drains to Puget Sound

Area 7

The Duwamish Manufacturing Industrial Center subarea contains almost no areas with more than 10% tree canopy cover. The exceptions are in residential areas. Some Neighborhood Residential and Multifamily areas in the Georgetown neighborhood have approximately 15% canopy cover. Ares with greater canopy cover—25 to 30%—occur in residential areas in the South Park neighborhood.

Several streams that originate in Area 6 briefly pass through Area 7 before discharging to the Duwamish Waterway. These are Longfellow Creek, Puget Creek, and the two unnamed tributaries that enter the waterway near and approximately 0.5 mile north of the 1st Avenue South Bridge. Runoff from most of Area 7 discharges to the Duwamish Waterway. Some is piped several miles north to King County's West Point Wastewater Treatment Plant in Discovery Park.

Area 8

Much of southeast Seattle is characterized by areas with comparatively low canopy cover (**Exhibit 3.3-2**). In contrast to other parts of the city, this is true even in residential areas. The exceptions are the residential areas bordering Lake Washington, where canopy cover is moderate to high. Away from Lake Washington, areas with relatively high canopy cover are largely limited to greenspaces and parks associated with ravines and the steep slopes of Beacon Hill.

NWIFC (2023) does not identify any fish-bearing streams in Area 8, while WDNR (2023) classifies Taylor Creek as potentially fish-bearing. Monitoring studies have confirmed that the lowermost reaches of Taylor Creek (between Rainier Avenue South and Lake Washington) provide rearing habitat for juvenile Chinook and coho salmon from other stream systems (Tabor and Moore 2020). The same study found juvenile Chinook and coho salmon in a recently daylighted reach of Mapes Creek downstream of Seward Park Avenue South.

3.3.2 Impacts

Under any of the alternatives, the potential for adverse effects on plants and animals would be avoided, minimized, documented, and mitigated ~~to the greatest extent possible~~ through regulatory reviews and permitting processes that apply to individual projects (see **Section 3.3.3**). None of the alternatives propose any modifications to those processes. For these reasons, all ~~five~~ alternatives would have the same potential for adverse effects on special-status plants and animals citywide and in the various analysis subareas. The action alternatives would include policies to maintain and enhance tree canopy in rights of way and city property and to expand tree canopy throughout the community, prioritizing residential and mixed-use areas with the least current tree canopy. These policies could lead to beneficial effects for some species.

In addition, given that habitats in the city limits represent a very small proportion of the total amount of habitat available to any species, differences in the availability or distribution of habitats in the city would be unlikely to result in any appreciable impacts on ~~regional~~ populations of plants or animals in areas in and near Seattle. Based on these considerations, none of the alternatives would be expected to result in impacts that would reduce the likelihood that populations of native plant or animal species would persist in or near Seattle~~of survival or recovery of a plant or animal species in the wild~~.

Development and redevelopment projects would, however, have the potential for localized impacts on plant and animal communities. Projects that entail vegetation clearing would likely reduce the diversity and/or abundance of plants and animals on and near the affected parcels. These impacts would be expected to diminish over time as vegetation regrows in temporarily disturbed areas. Projects that increase the area of individual parcels occupied by buildings and impervious surfaces would be expected to result in long-term (but localized) reductions in the diversity and/or abundance of plant and animal communities in the affected areas.

Development and redevelopment projects have the potential to affect species and habitats in adjacent parks and natural areas. For example, replacing single-story houses with taller structures may increase shading of nearby vegetation. Also, clearing of vegetation on private parcels may diminish the habitat value of vegetation in adjoining areas of parks or natural areas. The extent of these potential impacts is limited because most parks and natural areas are bordered by public rights-of-way instead of private parcels. In addition, residential areas near most parks and natural areas have lower height limits than elsewhere. The potential for adverse impacts is further limited by regulations that encourage tree retention and require

replacement of trees that are removed from private parcels. Finally, the potential for such impacts to result in long-term reductions in tree canopy would be limited by policies and goals in the One Seattle Plan, including policies for updating forest management plans, decisions, and actions in response to changes and trends in tree canopy cover (see **Section 3.3.3**).

Development and redevelopment projects in or near riparian zones and other areas of relatively undisturbed habitat may degrade habitat quality or disrupt the behavior of terrestrial wildlife that use those areas as travel corridors. The potential for substantial adverse effects is low, however, because most such areas are classified as environmentally critical areas and protected during project reviews.

In addition to providing protection for plants and animals in general, existing regulations, policies, and practices encourage the retention and expansion of tree canopy and the minimization of contaminants delivered to surface waters, including fish-bearing streams. Applicable regulations include those restricting the removal of trees on private property (SMC Chapter 25.11, Tree Protection), limiting disturbance and requiring mitigation in Environmentally Critical Areas (SMC Chapter 25.09 and 23.60A), regulating street trees, requiring landscaping and tree planting, and implementing stormwater requirements (see **Section 3.3.3** for more details).

Even though several of these regulatory requirements directly or indirectly limit tree removal, the results of the 2022 City of Seattle Tree Canopy Assessment demonstrate that the regulations in effect at that time did not prevent development and redevelopment projects from contributing to tree canopy loss. After that study was completed, however, the City updated its regulations to implement stronger tree planting requirements and to require street trees to be planted as part of development in Neighborhood Residential zones. With the current regulations, it is expected that a substantial amount of development-related loss of tree canopy would be reversed over time as replacement trees grow larger. Since some tree placement would occur off-site through the fee-in-lieu option, this could also result in a shifting of canopy cover onto public property and the right-of-way where the City might have more control over tree establishment and maintenance. See **Section 3.3.3** for additional discussion of the mitigative potential of Seattle's current regulations. Based on the potential for reductions in canopy cover, projects that entail tree clearing could slow progress toward achieving the City's canopy cover goal.

Impacts Common to All Alternatives

The One Seattle Comprehensive Plan Update proposal and alternatives address where residential and commercial development will happen within the city limits. Based on the results of the citywide review of tree canopy cover, development projects on parcels in the Neighborhood Residential or Multifamily management units are likely to result in more loss of tree canopy, compared to development on parcels in other management units (see **Section 3.3.1**). This is particularly true of parcels with lower-density residential designations, where existing canopy cover is higher than elsewhere (**Exhibit 3.3-1**). As such, strategies that convert

parcels with lower-density residential designations to higher-density designations could result in localized reductions in ~~reduce the total amount of~~ tree canopy cover ~~in the city~~.

The findings of the 2022 Tree Canopy Assessment indicate that canopy loss on parcels that underwent development between 2016 and 2021 represented a very small proportion of the total tree canopy in the city—less than 0.25 percent (35 acres out of more than 15,000 acres). The proportion of the city's overall tree canopy vulnerable to development-related canopy loss in any given 5-year period is not likely to differ substantially from that percentage. This expectation is based on the practical and economic constraints that limit the number of parcels that can be developed or redeveloped in any given year, combined with policies and regulations designed to reduce the rate of canopy loss associated with residential and commercial development.

In addition, as discussed above, a substantial portion of development-related reductions in canopy cover would be reversed over time as replacement trees grow, and the potential for any such reductions would be limited by regulations that protect existing trees and require replacement of trees that are removed from private parcels. Even with these considerations, however, development and redevelopment projects may result in temporal loss of the benefits provided by tree canopy. That is to say, when established trees are replaced by newly planted trees, it may take many years for the planted trees to gain sufficient canopy area and volume to replace the functions of the trees they replace. This loss would be offset over time by the growth and development of trees that have already been planted to replace trees removed for past development projects.

summarizes the amount of area that would be assigned to various place types under the alternatives. The values in this exhibit are drawn from **Exhibit 2.4-3**, **Exhibit 2.4-8**, **Exhibit 2.4-14**, **Exhibit 2.4-17**~~, and~~ **Exhibit 2.4-20**, and **Exhibit 2.4-26** in **Chapter 2**. Analyses in this section are based on the expectation that reducing the amount of area dedicated to lower-density residential uses (and, by the same token, increasing the amount of area available for conversion to higher-density uses) would lead to an elevated risk of impacts to vegetation (including loss of tree canopy) on redeveloped parcels and in nearby road rights-of-way. ~~In other words, a higher value in the "New place types" row in **Exhibit 3.3-4** indicates a higher potential for development-related impacts to vegetation.~~

~~Exhibit 3.3-. Comparison of Impacts from Each Alternative~~

	~~Size in Acres (Approx)~~				
~~Place Type~~	~~Alt. 1~~	~~Alt. 2~~	~~Alt. 3~~	~~Alt. 4~~	~~Alt. 5~~
~~Existing Centers and Villages[1]~~	~~10,131~~	~~10,131~~	~~10,131~~	~~10,131~~	~~11,528~~
~~New place types[2]~~	~~0~~	~~2,923~~	~~32,581~~	~~20,420~~	~~32,294~~
~~Place types not changing in alternative[3]~~	~~33,633~~	~~30,768~~	~~1,052~~	~~13,213~~	~~0~~
~~Manufacturing/Industrial~~	~~5,896~~	~~5,896~~	~~5,896~~	~~5,896~~	~~5,896~~
~~Place types not changing in all alternatives[4]~~	~~3,854~~	~~3,854~~	~~3,854~~	~~3,854~~	~~3,854~~

~~Notes:~~
~~1 Includes areas designated as urban centers or urban villages (under Alternative 1, No Action) or as regional centers or urban centers (under the action alternatives).~~

~~2 Includes areas that would be classified as neighborhood centers, urban neighborhoods, or corridors under the action alternatives. It is assumed for this analysis that most such areas are currently zoned for single-family residential or other low-density uses and would remain so under Alternative 1, No Action.~~
~~3 Includes areas classified as "Outside Subareas" in **Exhibit 2.4-3**, **Exhibit 2.4-8**, **Exhibit 2.4-14**, **Exhibit 2.4-17**, and **Exhibit 2.4-20**.~~
~~4 Consists of areas classified as "Outside Subareas" common to all alternatives in **Exhibit 2.4-3**, **Exhibit 2.4-8**, **Exhibit 2.4-14**, **Exhibit 2.4-17**, and **Exhibit 2.4-20**.~~
~~Sources: City of Seattle, 2024; BERK, 2024.~~

~~Under Alternative 5, in addition to the areas in the "new place types" category, approximately 1,400 more acres would fall in the "existing centers and villages" category, compared to the other alternatives (**Exhibit 3.3-4**). Most parcels in the areas that would be converted to the "existing centers and villages" category are currently zoned for lower-density residential uses. Therefore, it is assumed for this analysis that the converted areas would face a higher potential for development-related impacts to vegetation under Alternative 5, compared to the other alternatives.~~

For this Final EIS, analysts also estimated the acreage of land potentially developed for residential purposes under each alternative. This approach is based on the anticipated distribution of new housing units in each place type. Considering different place types and likely densities, analysts estimated the square footage of land likely to be developed per new housing unit in each place type. By multiplying that area by the anticipated number of new housing units in each place type, the total area that may be affected by residential development projects during the 20-year planning period can be estimated. These estimates are presented in **Exhibit 3.3-4**. See **Appendix G** for a more detailed presentation of this analysis.

Exhibit 3.3-4. Estimated Area (Acres) That May Be Affected by Residential Development under Each Alternative

Place Type	Alt. 1	Alt. 2	Alt. 3	Alt. 4	Alt. 5	Preferred
Center (Existing or New)[1]	984	1,401	984	1,215	1,458	1,252
Outside Subareas (Continued Development)[2]	501	254	176	332	116	97
Urban Neighborhood[3]	0	0	1,330	0	525	1,249
Corridor[4]	0	0	0	455	246	159
Urban Neighborhood—Other Multifamily	0	0	0	0	0	13
Total	**1,485**	**1,655**	**2,490**	**2,002**	**2,345**	**2,770**

Notes: This exhibit is new since the Draft EIS.
[1] Under Alternative 1, this includes areas classified as urban centers, urban villages, manufacturing-industrial centers, and Growth Area (maritime industrial). Under the action alternatives, this includes areas classified as regional centers, urban centers, and neighborhood centers.

[2] Includes areas classified as "Outside Subareas" common to all alternatives in **Exhibit 2.4-3**, **Exhibit 2.4-8**, **Exhibit 2.4-14**, **Exhibit 2.4-17**, **Exhibit 2.4-20**, and **Exhibit 2.4-26**. No change to place type is proposed in these areas, but growth would continue to occur throughout the 20-year planning period. Under the Preferred Alternative, all lands in the city would be assigned a new place type, and no areas are classified as "Outside Subareas." The estimated development area for this place type under the Preferred Alternative reflects growth assigned to sites that were classified as "Outside Subareas" under Alternatives 1-5, regardless of their assigned place type under the Preferred Alternative.
[3] Under Alternatives 3 and 5, this consists of areas classified as urban neighborhood. Under the Preferred Alternative, this consists of areas classified as urban neighborhood—neighborhood residential.
[4] Under Alternatives 4 and 5, this consists of areas classified as corridor. Under the Preferred Alternative, this consists of areas classified as urban neighborhood—frequent transit corridor.
Sources: City of Seattle, 2025; Parametrix, 2025; BERK, 2025.

The amount of vegetation that would be affected by development in the areas identified in would depend on the condition of the parcels undergoing development. The locations of those parcels cannot be predicted, nor can the condition of the vegetation they may support when development occurs in the future. The evaluation of each alternative's potential to affect vegetation is based on the assumption that, as the total area of residential development increases, so would the risk of impacts to vegetation. In other words, the Total values in indicate the alternatives' relative potential to affect vegetation, including tree canopy cover.

~~The total number of demolitions under each alternative is summarized in **Exhibit 3.8-44**. These numbers can provide a high-level indication of the amount of land that would be redeveloped over a 20 year period, particularly in existing Neighborhood Residential zones where the number of units per lot area does not vary substantially. Alternatives 3 and 5 would result in the largest number of demolitions which would tend to result in more area of redevelopment.~~

Since Alternative 1 and the Preferred Alternative have both place type and zoning level information, a further comparison is shared below regarding how Neighborhood Residential Zones would change between the two alternatives. See **Exhibit 3.3-5** and **Exhibit 3.3-6**. Most of the Neighborhood Residential Zone would be within an urban neighborhood designation (88%). While there is a potential for additional housing types per HB 1110 and alteration of existing vegetation and tree canopy, there is also an opportunity to retain tree canopy with amended zoning standards as described in **Section 3.6.2**. Another 5% of Neighborhood Residential Zone would be designated as urban neighborhood—frequent transit corridor, and there is a greater potential for intensification and change to existing vegetation and tree canopy. Another 8% each would be designated either neighborhood center or urban center with greater intensity that may also result in change to existing vegetation and tree canopy. Where intensification occurs and there is change to existing vegetation and tree canopy landscape standards and tree canopy regulations would apply.

Exhibit 3.3-5. NR Zone Site Acreage by Preferred Alternative Place Type

Existing	Preferred Alternative						
No Action Zone	Place Type	Regional Center–Metro	Regional Center–Urban	Urban Center	Neighborhood Center	Corridor	Urban Neighborhood
NR1	Outside Subareas	0	0	0	0	3	571
NR2	Outside Subareas	0	1	132	30	234	4,116
NR2	Hub Urban Village	0	0	0	0	0	0
NR3	Outside Subareas	21	0	425	585	499	9,135
NR3	Residential Urban Village	0	0	41	0	0	0
NR3	Hub Urban Village	0	0	1	0	0	0
Total (Rezoned Parcels Only)		**21**	**1**	**599**	**616**	**737**	**13,823**
Percent of total		**0.1%**	**0.0%**	**4%**	**4%**	**5%**	**88%**

Note: This exhibit is new since the Draft EIS.
Sources: City of Seattle, 2024; BERK, 2025.

Exhibit 3.3-6. NR Zone Preferred Alternative Housing Growth by Place Type

Existing	Preferred Alternative						
No Action Zone	Place Type	Regional Center–Metro	Regional Center–Urban	Urban Center	Neighborhood Center	Corridor	Urban Neighborhood
NR1	Outside Subareas	0	0	0	0	49	582
NR2	Outside Subareas	0	0	1,388	441	2,765	5,128
NR2	Hub Urban Village	0	0	0	0	0	0
NR3	Outside Subareas	647	0	3,350	6,763	5,695	15,222
NR3	Residential Urban Village	0	0	30	0	0	0
NR3	Hub Urban Village	0	0	1	0	0	0
Total (Rezoned Parcels Only)		**647**	**0**	**4,768**	**7,204**	**8,508**	**20,932**
Percent of total		**2%**	**0%**	**11%**	**17%**	**20%**	**50%**

Note: This exhibit is new since the Draft EIS.
Sources: City of Seattle, 2024; BERK, 2025.

Canopy cover loss could also occur due to non-residential development. However, the amount of tree loss due to non-residential development is not likely to vary substantially between the alternatives as total job growth would not vary between the alternatives and because urban development associated with new jobs would tend to occur in existing commercial and industrial areas under all the alternatives.

Development or redevelopment projects may create or replace impervious surfaces, including some pollution-generating impervious surfaces. If runoff from these surfaces enters fish-

bearing streams, contaminants in the runoff may harm or kill fish. Contaminants in runoff that enters surface waters may also be harmful to terrestrial wildlife. Stormwater contaminants that enter Puget Sound and other marine areas are almost immediately diluted to concentrations too low to have any discernible effects on species in that environment.

As discussed in **Section 3.1.2** in **Earth & Water Quality**, on-site stormwater management would likely be required for development or redevelopment projects within the city limits. Implementation of required stormwater management would occur under any of the alternatives and would prevent or minimize the delivery of contaminants to ~~fish-bearing streams~~surface waters. This, in turn, would avoid or minimize the potential for adverse impacts on ~~aquatic species~~ fish, wildlife, and their habitats.

The locations, design, and performance standards of stormwater facility improvements would be determined on a project-by-project basis and cannot be predicted for a programmatic review such as this. For this analysis, it is assumed that the potential for stormwater contaminants to be delivered to streams would be proportional to the amount of area available for conversion to higher-density uses. This assumption is based on the reasoning that a greater amount of area available for redevelopment projects would translate into a greater potential that there may be some projects for which it is not possible to avoid adverse impacts on water quality altogether.

Encouraging residential and commercial development within the urban environment of Seattle could indirectly benefit plants and animals by easing development pressure in less-developed areas outside the city. Tree canopy assessments such as i-Tree show that, compared to urban areas, suburban and rural areas generally have more tree canopy and lower levels of human activity. Development projects in such areas typically entail the conversion of vegetated or minimally disturbed areas to impervious surfaces and areas with elevated levels of human activity. In contrast, most currently undeveloped properties in Seattle are in protected areas (e.g., parks, greenspaces) and are unlikely to be developed during the timeframe of this analysis.

Equity & Climate Vulnerability Considerations

As discussed in **Section 3.3.1**, areas with disadvantaged populations tend to have less canopy cover than other areas. In addition, these areas lost more canopy cover, on average, compared to other neighborhoods, during the 5-year study period of the City's tree canopy assessment. For these reasons, alternatives with a higher likelihood of contributing to canopy cover loss in areas with a combination of disadvantaged populations and low canopy cover would have an elevated risk of adverse effects on disadvantaged populations. Many areas with extensive multifamily development (e.g., apartment complexes) have this combination. Therefore, alternatives that concentrate growth in areas where extensive multifamily development is already present may have a higher likelihood of contributing to canopy cover loss in areas with disadvantaged populations.

Conversely, changes that allow lower-cost housing options in areas that are currently zoned for low-density development could allow more disadvantaged populations to live in areas with

higher canopy cover and access to large parks. Also, with the requirement for street trees to be planted as part of development in Neighborhood Residential zones, new development could result in more tree canopy in public rights-of-way. In contrast to trees on private parcels, the benefits of trees in public rights-of-way are available to more people, including those from disadvantaged populations. Finally, disadvantaged communities would be expected to benefit from policies that prioritize the protection, maintenance, and expansion of tree canopy in residential and mixed-use areas where tree canopy is currently low. These factors would offset some of the potential adverse effects that might arise from concentrating growth in areas where extensive multifamily development is already present.

As discussed in **Section 3.3.1**, trees play a vital role in moderating temperatures in urban areas. Alternatives with a higher likelihood of contributing to canopy cover loss in areas with low canopy cover would have an elevated risk of exacerbating local heat island[19] impacts. Alternatives that concentrate growth in areas where extensive multifamily development is already present may have a higher likelihood of exacerbating climate vulnerability.

Impacts of Alternative 1: No Action

Under Alternative 1, 80,000 new housing units would be added in Seattle by 2044 to meet regionally set growth targets. More than 66,000 (83%) of these would be in areas with high-density designations (e.g., urban centers, urban villages, industrial areas). Several of these areas also have a combination of disadvantaged populations and low canopy cover, including the following:

- **Area 1:** The Aurora Avenue North corridor north of N 85th Street
- **Area 2:** Northgate, Lake City
- None in Area 3
- **Area 4:** Downtown core, South Lake Union
- **Area 5:** Yesler Terrace, Judkins Park
- **Area 6:** Highland Park/White Center
- **Area 7:** South Park
- **Area 8:** North Beacon Hill, Holly Park, Dunlap

Continued redevelopment in these areas could have the effect of reducing tree canopy cover where it is needed most, both in terms of livability and of climate resiliency.

In portions of urban centers and urban villages where the existing canopy cover is relatively high, redevelopment projects may not have substantial adverse effects on livability. However, projects that entail clearing on canopy-rich parcels could impede progress toward the City's canopy cover goal. Currently, few areas with relatively high canopy cover are found in areas designated as urban centers or urban villages; this would likely continue to be the case under Alternative 1.

[19] A heat island is an area that experiences higher temperatures than other areas due to concentrations of buildings, roads, and other infrastructure that absorbs and re-emit the sun's heat more than natural landscapes such as forests and water bodies. The heat island effect can result in daytime temperatures up to 7° Fahrenheit higher than temperatures in outlying areas.

Alternative 1 would result in fewer new housing units than any of the other alternatives. In addition, and in contrast to the action alternatives, Alternative 1 would not reduce the amount of area dedicated to lower-density residential uses~~and it would have the smallest amount of area available for conversion to higher-density uses (**Exhibit 3.3-4**)~~. This would be the case both at the citywide scale and within seven of the eight analysis subareas. The exception is Area 4 (Downtown/South Lake Union), where essentially the same number of housing units would be added under all ~~five~~ six alternatives. For these reasons, the place type-based analysis indicates that Alternative 1 ~~would be expected to result in~~ may have a lower potential for development-related impacts to vegetation (including tree canopy) ~~cover loss~~ than any of the action alternatives, both citywide and in the individual analysis subareas.

Similarly, based on the estimated area that may be affected by residential development projects during the 20-year planning period (**Exhibit 3.3-4**), Alternative 1 would have a lower potential for development-related impacts to vegetation, compared to the action alternatives.

Compared to the action alternatives, Alternative 1 would result in less growth in the city overall but would tend to focus that growth in areas where extensive multifamily development is already present. As a result, Alternative 1 would have a moderate risk of contributing to adverse effects on disadvantaged populations or exacerbating climate vulnerability compared to the action alternatives.

Compared to the action alternatives, Alternative 1 would result in less growth in the city overall but would tend to focus that growth in areas where extensive multifamily development is already present. As a result, Alternative 1 would have a moderate risk of contributing to adverse effects on disadvantaged populations or exacerbating climate vulnerability compared to the action alternatives.

Based on the anticipated amount of area available for conversion to higher-density uses~~likely to be redeveloped~~, Alternative 1 would also have a lower potential of leading to increased delivery of stormwater contaminants to streams, compared to the other alternatives.

130th/145th Station Area

The 130th/145th Station Area does not include any neighborhoods where areas with a high-density designation under Alternative 1 would overlap areas with a combination of disadvantaged populations and low canopy cover. In addition, no areas with relatively high canopy cover are found in areas that would continue to be designated as urban centers or urban villages in the 130th/145th Station Area under Alternative 1.

No areas currently zoned primarily for single-family residential uses in the 130th/145th Station Area would be converted to higher-density designations under Alternative 1. As such, Alternative 1 would have a lower potential of leading to increased delivery of stormwater contaminants to streams in this area, compared to the other alternatives.

Impacts of Alternative 2: Focused

Under Alternative 2, 100,000 new housing units would be added in Seattle by 2044—20,000 more than under Alternative 1. Almost 91,000 of the new housing units would be in areas with high-density designations (regional centers, urban centers, industrial areas, neighborhood centers). As under Alternative 1, several of these areas also have a combination of disadvantaged populations and low canopy cover. Development or redevelopment projects in neighborhood centers established under Alternative 2 could contribute to tree canopy loss in the following areas with a combination of disadvantaged populations and low canopy cover:

- **Area 1:** Greenwood Ave N and N 145th Street
- None in Areas 2, 3, 4, or 5
- **Area 6:** 35th Ave SW and SW Morgan Street, 35th Ave SW and SW Barton Street
- **Area 7:** Georgetown
- **Area 8:** Rainier Ave S and S Graham Street, Beacon Ave S and S Columbian Way (west of Beacon Ave S)

Canopy loss in these areas would be in addition to the canopy loss in the regional centers and urban centers identified in the analysis of Alternative 1. Not all areas with a combination of disadvantaged populations and low canopy cover would experience increased density (and resultant impacts on tree canopy) associated with the establishment of neighborhood centers. Examples include portions of the Licton Springs, High Point, Mid Beacon Hill, and South Beacon Hill neighborhoods.

Development or redevelopment projects in neighborhood centers established under Alternative 2 could also contribute to tree canopy loss in areas with relatively high proportions of existing canopy cover, potentially impeding progress toward the City's canopy cover goal. Such losses may occur in the following neighborhood centers (underlining indicates areas that also have disadvantaged populations):

- **Area 1:** Holman Rd NW and 3rd Ave NW (north of Holman Rd NW), N 56th Street and Keystone Place N
- **Area 2:** 15th Ave NE and NE 145th Street, 8th Ave NE and Roosevelt Way NE, 15th Ave NE and NE 125th Street, Roosevelt Way NE and NE 90th Street, 40th Ave NE and NE 55th Street, 40th Ave NE and NE 55th Street, Princeton Ave NE and Sand Point Way NE, 25th Ave NE and NE 65th Street, 35th Ave NE and NE 75th Street, 35th Ave NE and NE 85th Street, Sand Point Way NE and NE 45th Street
- **Area 3:** 34th Ave W and W Emerson Street, 33rd Ave W and W McGraw Street
- (None in Area 4)
- **Area 5:** 10th Ave E and E Boston Street, 24th Ave E and E Calhoun Street, 29th Ave E and E Madison Street, 42nd Ave E and E Madison Street, 34th Ave and E Union Street
- **Area 6:** Delridge Way SW and SW Dakota Street, Delridge Way SW and SW Brandon Street, Delridge Way SW and SW Orchard Street

- (none in Area 7)
- **Area 8:** Beacon Ave S and S Columbian Way (east of Beacon Ave S)

The amount of land in place types dedicated to relatively high-density residential uses would be ~~Under Alternative 2,~~ about 3,000 acres greater under Alternative 2 than under Alternative 1, indicating a higher potential for development-related impacts to vegetation (including tree canopy) under this alternative. This difference is the smallest ~~of currently lower-density parcels may be converted to higher-density uses (neighborhood centers), the smallest area of conversion~~ among the action alternatives. Growth would be focused in neighborhood centers. ~~Among the action alternatives,~~ This place-type-based analysis indicates that Alternative 2 would ~~thus~~ have ~~the~~ a lower~~st~~ potential for development-related impacts to vegetation (including loss of tree canopy cover) citywide, compared to the other action alternatives.

Similarly, analysis of the estimated area that may be affected by residential development projects during the 20-year planning period (**Exhibit 3.3-4**) also indicates that Alternative 2 would have a lower potential for development-related impacts to vegetation, compared to the other action alternatives.

Many of the neighborhood centers added under Alternative 2 would be near existing centers and villages or include neighborhood business districts, where extensive multifamily development is already present. However, the focused-growth strategy would limit the number of such areas where additional growth would occur. As a result, Alternative 2 would have a ~~relatively~~ higher risk of contributing to adverse effects on disadvantaged populations or exacerbating climate vulnerability than Alternative 3.

Based on the amount of area where development or redevelopment may result in losses of vegetated areas, Alternative 2 would also likely have the lowest potential, among the action alternatives, for short-term and long-term decreases in the diversity and/or abundance of plant and animal communities in areas where development or redevelopment projects occur.

The differences between Alternative 2 and the other action alternatives would not be distributed evenly across all analysis subareas. These differences in distribution are most noticeable when Alternative 2 is compared to Alternatives 3 and 4, all of which would add the same number of new housing units (100,000) in the city. Compared to those two alternatives, Alternative 2 would add 5,000 to 5,500 fewer households in Areas 2, 6, and 8 (combined), and it would add 5,000 to 5,500 more households in the other analysis subareas (combined). Increasing the number of households in any given area would be expected to result in an elevated potential for adverse impacts on plants and animals in that area. As such, compared to Alternatives 3 and 4, Alternative 2 would have a lower risk of adverse effects in Areas 2, 6, and 8, and a higher risk of adverse effects in Areas 1, 3, 5, and 7. Area 4 ~~has~~ would have the same growth in all the alternatives.

The differences in the geographic distribution of potential impacts are not as noticeable in comparison to Alternative 5 and the Preferred Alternative because those ~~A~~alternatives ~~5~~ would add 20,000 more housing units citywide than Alternative 2 would. In all eight analysis

subareas, the risk of adverse effects under Alternative 2 would be less than or ~~essentially equal~~ in between those ~~to that~~ of Alternative 5 and the Preferred Alternative.

Based on the anticipated amount of area available for conversion to higher-density uses~~likely to be redeveloped~~, Alternative 2 would have a lower potential of leading to increased delivery of stormwater contaminants to streams, ~~than~~ compared to the other action alternatives, but it would have a slightly higher potential than Alternative 1.

130th/145th Station Area

None of the Alternative 2 neighborhood centers in the 130th/145th Station Area would overlap areas with a combination of disadvantaged populations and low canopy cover. All three of the neighborhood centers that would be established in the 130th/145th Station Area under Alternative 2 would partially overlap areas with moderately high canopy cover.

Approximately 117 acres in the 130th/145th Station Area (52 acres in the NE 130th Street unit and the full 65-acre area of the NE 145th Street unit) would be designated as neighborhood centers. Current zoning in much of the area that would be redesignated under Alternative 2 encourages high-density uses, such as commercial and multifamily residential. Areas that are currently zoned primarily for single-family residential uses and that would be converted to higher-density designations under Alternative 2 make up approximately one-half of the 117-acre area that would be designated as neighborhood centers. As such, Alternative 2 would have a higher potential than Alternative 1~~,~~ of leading to increased delivery of stormwater contaminants to streams in this ~~A~~area ~~1~~, but a lower potential than the other action alternatives.

Impacts of Alternative 3: Broad

Under Alternative 3, as under Alternative 2, 100,000 new housing units would be added in Seattle by 2044, and the vast majority (more than 89,000) would be in areas with high-density designations (regional centers, urban centers, industrial areas, urban neighborhood areas). Compared to Alternative 1~~2~~, a substantially larger area would be in place types dedicated to relatively high-density residential uses~~of currently lower-density parcels~~—approximately 32,500 acres.~~—~~ This would be a much larger increase than under Alternative 2, and the affected ~~may be converted to higher-density uses in urban neighborhood areas (**Exhibit 3.3-4**). Such~~ parcels would be distributed throughout the city.

This place-type-based analysis indicates that ~~Based on the amount of area where currently low-density parcels may be converted to higher-density uses,~~ Alternative 3 would ~~be expected to~~ have the higher potential for development-related impacts to vegetation citywide ~~loss of tree canopy~~ (and, by extension, a higher potential to impede progress toward the City's canopy cover goal), ~~than~~ compared to Alternatives 2 and 4, and a potential similar to those of Alternative 5 and the Preferred Alternative.

Analysis of the estimated area that may be affected by residential development projects during the 20-year planning period (Exhibit 3.3-4) produces similar results: the total area affected under Alternative 3 (and, as such, the potential for development-related impacts to vegetation) would be greater than under Alternatives 2, 4, and 5, and it would be less than under the Preferred Alternative.

Compared to the other alternatives, Alternative 3 would direct a higher share of housing growth to areas currently dominated by low-density residential development. Such areas would be assigned to the urban neighborhood place type or would be outside areas designated for high-density development. Based on the expectation that tree canopy cover in such areas is greater than in areas where high-density development is already present, Alternative 3 may have a higher potential for vegetation impacts—including loss of tree canopy—compared to the other action alternatives.

While distributing growth throughout the city (particularly in lower-density areas) would ~~affect more~~ result in a comparatively high potential for tree canopy loss~~cover than the other alternatives~~, this approach would also minimize the amount of growth in areas where extensive multifamily development is already present. As a result, compared to the other action alternatives, Alternative 3 would have the lowest risk of contributing to adverse effects on disadvantaged populations or exacerbating climate vulnerability.

Based on the amount of area where development or redevelopment may result in losses of vegetated areas, Alternative 3 would ~~have the second-highest potential (second~~ be similar to Alternative 5 and the Preferred Alternative, ~~) for~~ in terms of the potential for localized short-term and long-term decreases in the diversity and/or abundance of plant and animal communities. As discussed above, Alternative 3 would have a higher risk than Alternative 2 of adverse effects in Areas 2, 6, and 8, and a lower risk of adverse effects in Areas 1, 3, ~~4,~~ 5, and 7.

Based on the anticipated amount of area available for conversion to higher-density uses~~likely to be redeveloped~~, Alternative 3 would have the second-highest potential (second to Alternative 5) for leading to increased delivery of stormwater contaminants to streams.

130th/145th Station Area

Under Alternative 3, a station area plan would not be implemented. Growth would occur based on the citywide place types assigned to the station vicinity. Based on the widespread distribution of areas where currently lower-density parcels may be converted to higher-density uses, the impacts of Alternative 3 the 130th/145th Station Area would be as described for the citywide analysis, above.

Approximately 200 acres of parcels that are currently zoned primarily for single-family residential uses in the 130th/145th Station Area would be converted to higher-density residential designations (i.e., urban neighborhood) under Alternative 3. This includes roughly 20 acres in the NE 145th Street unit and roughly 180 acres in the NE 130th Street unit.

Alternative 3 would thus have the highest potential of leading to increased delivery of stormwater contaminants to streams in this area, compared to the other alternatives.

Impacts of Alternative 4: Corridor

Under Alternative 4, as under Alternatives 2 and 3, 100,000 new housing units would be added in Seattle by 2044; approximately 88,000 of these would be in areas with high-density designations (regional centers, urban centers, industrial areas, corridor areas). Compared to Alternative 1, ~~The area of currently lower-density parcels that may be converted to higher-density uses in corridor areas would be~~ approximately 20,500 more acres would be in place types dedicated to relatively high-density residential uses, representing a greater increase ~~—more~~ than under Alternative 2 ~~(3,000 acres)~~ and ~~less~~ a smaller increase than under Alternative 3 ~~(32,500 acres) (**Exhibit 3.3-4**)~~. This place-type-based analysis indicates that the potential for development-related impacts to vegetation (including loss of tree canopy cover) citywide under Alternative 4 would be intermediate between those of Alternatives 2 and 3.

The distribution of the areas ~~likely to~~ that may experience development-related canopy cover loss would be less focused than under Alternative 2 and less widespread than under Alternative 3. As a result, in areas with relatively high proportions of existing canopy cover, the impacts of Alternative 4 would also likely lie between those of Alternatives 2 and 3. Among the action alternatives, Alternative 4 would thus result in a moderate potential for loss of tree canopy cover.

Analysis of the estimated area that may be affected by residential development projects during the 20-year planning period (**Exhibit 3.3-4**) produces similar results: the total area affected under Alternative 4 (and, as such, the potential for development-related impacts to vegetation citywide) would be greater than under Alternatives 1 and 2, and it would be less than Alternatives 3 and 5 and the Preferred Alternative.

Alternative 4 would emphasize growth in corridors ~~which~~ that include arterial streets where multifamily development is present ~~and~~ as well as in surrounding areas where it is less common. The distribution of these neighborhood residential-corridor areas would be more widespread than the neighborhood centers of Alternative 2. As a result, Alternative 4 would have a higher risk of contributing to adverse effects on disadvantaged populations or exacerbating climate vulnerability than Alternative 3 and a lower risk than Alternative 2.

Based on the amount of area where development or redevelopment may result in losses of vegetated areas, the potential for localized short-term and long-term decreases in the diversity and/or abundance of plant and animal communities under Alternative 4 would be intermediate between those of Alternative 2 and Alternative 3. As discussed in the analysis of Alternative 2, Alternative 4 would have a higher risk than Alternative 2 of adverse effects in Areas 2, 6, and 8, and a lower risk of adverse effects in Areas 1, 3, ~~4,~~ 5, and 7.

Based on the anticipated amount of area available for conversion to higher-density uses~~likely to be redeveloped~~, Alternative 4 would have a higher potential than Alternative 2 of leading to

increased delivery of stormwater contaminants to streams, and a lower potential than Alternative 3.

130th/145th Station Area

Alternative 4 does not include implementation of a station area plan; ~~and~~ the corridor-focused alternative would apply similar place types as for other areas of the city. As described for the citywide analysis above, the impacts of Alternative 4 the 130th/145th Station Area would likely be greater than those anticipated for Alternative 2 and less than those anticipated for Alternative 3.

Similar to Alternative 3, Alternative 4 would convert approximately 200 acres of parcels that are currently zoned primarily for single-family residential uses in the 130th/145th Station Area to higher-density designations. As such, Alternative 4 would be expected to have the same potential as Alternative 3 of leading to increased delivery of stormwater contaminants to streams in this area.

Impacts of Alternative 5: Combined

Alternative 5 would implement a growth strategy that combines elements of the strategies from Alternative 2 (neighborhood centers), Alternative 3 (widespread redevelopment in urban neighborhood), and Alternative 4 (emphasis on redevelopment along major transportation corridors in urban neighborhood areas). Under Alternative 5, 120,000 new housing units would be added in Seattle by 2044—20,000 more than under ~~any of the other action a~~Alternatives 2 through 4. More than 113,000 (94%) of these would be in areas with high-density designations. Alternative 5 would also include the creation of a new urban center near NE 130th Street and the expansion of the existing urban centers in the Greenwood-Phinney Ridge, Upper Queen Anne, Admiral, West Seattle Junction, Morgan Junction, and Othello areas. As a result, ~~approximately 1,400 more acres~~ more area would ~~fall in the "Centers/high-density residential" category~~ be assigned to high-density place types (r~~R~~egional c~~C~~enter, u~~U~~rban c~~C~~enter) under this alternative, compared to the other alternatives ~~(**Exhibit 3.3-4**)~~.

Compared to Alternative 1~~Under Alternative 5~~, approximately 33,700 more acres would be in place types dedicated to relatively high-density residential uses—a slightly greater increase than under Alternative 3.~~of currently lower-density parcels may be converted to higher-density uses—more than under any of the other alternatives (**Exhibit 3.3-4**).[20]~~ These areas would be distributed throughout the city, ~~. As such, all~~ including areas with relatively high proportions of existing tree canopy cover ~~would be likely to experience additional canopy loss~~. This place-type-based analysis indicates that Alternative 5 would have the higher potential for development-related impacts to vegetation (and, by extension, a higher potential to impede progress toward the City's canopy cover goal), compared to Alternatives 2 and 4, and a potential similar to those of Alternative 3 and the Preferred Alternative.

[20] ~~This value includes approximately 32,300 areas in the "Place types identified for redevelopment" category, plus approximately 1,400 acres where parcels currently zoned for lower-density uses would be converted to urban centers.~~

Analysis of the estimated area that may be affected by residential development projects during the 20-year planning period (**Exhibit 3.3-4**) produces similar results: the total area affected under Alternative 5 (and, as such, the potential for development-related impacts to vegetation citywide) would be greater than under Alternatives 2 and 4, and it would be less than under Alternative 3 and the Preferred Alternative.

Compared to Alternative 3 and the Preferred Alternative, Alternative 5 would direct less housing growth to areas currently dominated by low-density residential development. As a result, Alternative 5 may have a lower potential for vegetation impacts—including loss of tree canopy—compared to those two alternatives.

~~Even though Alternative 5 would convert more lower-density parcels to higher-density uses, the potential for development-related canopy cover loss would likely be lower than under Alternative 3. This is because Alternative 5 would focus more development in neighborhood centers and corridors, rather than distributing it in urban neighborhoods throughout the city. Development or redevelopment projects in neighborhood centers and corridors would be expected to result in less canopy cover loss than would projects in areas classified as urban neighborhoods. Alternative 5 would thus have a lower likelihood than Alternative 3 of impeding progress toward the City's canopy cover goal, but a higher likelihood than Alternative 2 or Alternative 4.~~

~~Given the highest number of homes produced and the broadest range of areas affected, Alternative 5 would tend to have the highest potential for loss of tree canopy.~~

Because it would add more new housing units citywide—including in areas where extensive multifamily development is already present—~~Based on the citywide distribution of these areas, combined with the greater number of housing units that would be added under this alternative,~~ Alternative 5 ~~c~~would also have a higher risk of changes in canopy cover that contribute to adverse effects on disadvantaged populations or exacerbating climate vulnerability, compared to ~~the other action a~~Alternatives 1 through 4 or the Preferred Alternative.

Based on the amount of area where development or redevelopment may result in losses of vegetated areas, the potential for localized short-term and long-term decreases in the diversity and/or abundance of plant and animal communities under Alternative 5 would be greater than that of Alternative 3. In nearly all analysis subareas, the risk of adverse effects would be higher under Alternative 5 than under ~~any of the other a~~Alternatives 1 through 4. The exceptions would be Areas ~~2,~~ 3, ~~and~~ 4, and 5, where the number of housing units added under Alternative 5 (and, by extension, the potential for localized impacts on plants and animals) would be approximately equivalent to that of Alternative 2.

Based on the anticipated amount of area available for conversion to higher-density uses~~likely to be redeveloped~~, Alternative 5 would have a higher potential of leading to increased delivery of stormwater contaminants to streams, compared to ~~the other a~~Alternatives 1 through 4.

130th/145th Station Area

~~As described for~~ Similar to the citywide analysis ~~above~~, Alternative 5 would have more impacts in the 130th/145th Station Area than ~~any of the other a~~Alternatives 1 through 4. Neither the urban center at NE 130th Street nor the neighborhood center at 15th Ave NE and NE 145th Street would overlap any areas with a combination of disadvantaged populations and low canopy cover. However, both of these areas would partially overlap areas with moderately high canopy cover.

Similar to Alternatives 3 and 4, Alternative 5 would convert approximately 200 acres of parcels that are currently zoned primarily for single-family residential uses to higher-density designations. However, the housing target for these areas would be higher than under any of the other alternatives. As a result, more redevelopment projects would be expected to occur in these areas under Alternative 5 than under ~~the other a~~Alternatives 1 through 4, and Alternative 5 would thus have a higher potential of leading to increased delivery of stormwater contaminants to streams in this area, compared to ~~the other~~ those alternatives.

Impacts of Preferred Alternative

Note: The impacts analysis for the Preferred Alternative was added since the Draft EIS.

Similar in many ways to Alternative 5, the Preferred Alternative would incorporate ideas developed in all of the other alternatives. As with Alternative 5, 120,000 new housing units would be added in Seattle by 2044. The Preferred Alternative includes some refinements to the boundaries of urban centers and urban villages. In addition, one area (in South Park) classified as an urban village or urban center under Alternatives 1 through 5 would instead be a neighborhood center under the Preferred Alternative. Also, a small area of Manufacturing/Industrial land would instead be part of the Georgetown Neighborhood Center.

Compared to Alternative 1, approximately 33,600 more acres would be in place types dedicated to relatively high-density residential uses—an increase similar to that under Alternative 5. These areas would be distributed throughout the city, including areas with relatively high proportions of existing tree canopy cover. This place-type-based analysis indicates that the Preferred Alternative would have the higher potential for development-related impacts to vegetation (and, by extension, a higher potential to impede progress toward the City's canopy cover goal), compared to Alternatives 2 and 4, and a potential similar to those of Alternatives 3 and 5.

Analysis of the estimated area that may be affected by residential development projects during the 20-year planning period (**Exhibit 3.3-4**) produces similar results: the total area affected under the Preferred Alternative (and, as such, the potential for development-related impacts to vegetation citywide) would be greater than under any of the other alternatives.

Compared to Alternative 3, the Preferred Alternative would direct less housing growth to areas currently dominated by low-density residential development. As a result, the Preferred

Alternative may have a lower potential for vegetation impacts than that alternative but a higher potential than the other action alternatives.

In contrast to the other action alternatives, the Preferred Alternative includes proposed zoning. This allows a comparison of the amount of area zoned for different degrees of development density under this alternative and Alternative 1, No Action.

Under Alternative 1, approximately 15,800 acres would be in Neighborhood Residential-zoned areas outside of urban centers, urban villages, and other high-density zones. Under the Preferred Alternative, approximately 1,900 acres (12%) of this area would be zoned for higher-density uses (i.e., regional center, urban center, neighborhood center, frequent transit corridor). The remaining 88% would be zoned as Urban Neighborhood. See **Exhibit 3.3-5**. While Urban Neighborhood-zoned parcels would make up 88% of the lands previously zoned for low-density uses, only about 50% of the housing units anticipated under the Preferred Alternative would be located in these areas. In contrast to the analyses of place type changes and estimated area potentially affected by residential development projects, these findings suggest that, under the Preferred Alternative, a comparatively small number of parcels that currently support low-density residential development would be converted to higher-density uses. This indicates that the Preferred Alternative would have a comparatively low potential for impacts to vegetation, including tree canopy. The Preferred Alternative, like Alternative 5, would add more new housing units than Alternatives 1 through 4—including in areas where extensive multifamily development is already present. However, similar to Alternative 3, a substantial portion of the area potentially affected by residential projects would be in the Neighborhood Residential place type, where existing levels of multifamily development are comparatively low. Based on a comparison of the estimated amount of area affected by residential projects in areas where extensive multifamily development is already present, the Preferred Alternative would have a lower risk than Alternative 5 of contributing to adverse effects on disadvantaged populations or exacerbating climate vulnerability, and a higher risk than Alternatives 1 through 4.

Based on the amount of area where development or redevelopment may result in losses of vegetated areas, the potential for localized short-term and long-term decreases in the diversity and/or abundance of plant and animal communities under the Preferred Alternative would be greater than the other alternatives. Compared to Alternative 5 (under which an equal number of housing units would be added), the Preferred Alternative would add approximately 6,500 more housing units in Areas 1, 3, and 5, resulting in a greater potential for localized impacts on plants and animals in those analysis subareas.

Based on the anticipated amount of area available for conversion to higher-density uses, the Preferred Alternative would have a higher potential of leading to increased delivery of stormwater contaminants to streams, compared to any of the other alternatives.

130th/145th Station Area

Compared to Alternative 5, fewer new housing units would be added in this area, indicating that the Preferred Alternative would have a lower potential for impacts to vegetation. As with Alternative 5, neither the urban center at NE 130th Street nor the neighborhood center at 15th Ave NE and NE 145th Street would overlap any areas with a combination of disadvantaged populations and low canopy cover. However, both of these areas would partially overlap areas with moderately high canopy cover.

Similar to Alternative 5, the Preferred Alternative would convert approximately 200 acres of parcels that are currently zoned primarily for single-family residential uses to higher-density designations. As a result, the Preferred Alternative's potential for leading to increased delivery of stormwater contaminants to streams in this area would be similar to that of Alternative 5.

3.3.3 Mitigation Measures

Incorporated Plan Features

The action alternatives amend the Comprehensive Plan to address a new climate element including climate resilience strategies that include reducing heat islands and increasing tree canopy. ~~In addition,~~ In addition, the action alternatives include policies to maintain and enhance tree canopy. Examples of plan polices that would contribute to achieving the City's goal of at least 30% tree canopy cover include the following:

Policies that directly address tree canopy:

- LU 2.7: Encourage the preservation and expansion of the tree canopy throughout the city for the aesthetic, health, and environmental benefits trees provide, considering first the residential and mixed-use areas with the least tree canopy in order to more equitably distribute the benefits to residents.
- CE 12.3: Regularly update the tree canopy analysis to monitor changes and trends in the amount, distribution, and condition of the urban forest and use this information to shape urban forestry management plans, decisions, and actions.
- CE 12.6: Preserve, restore, maintain, and enhance tree canopy on City property and rights-of-way.
- CE 12.8: Encourage the protection, maintenance, and expansion of tree canopy throughout the community, prioritizing residential and mixed-use areas with the least current tree canopy to equitably distribute benefits.

Other policies that likely to contribute to the protection and maintenance of tree canopy:

- CE 9.3: Expand tree canopy and greenspace, especially in communities that experience disproportionate impacts of extreme heat and smoke events.

- P 1.17: Maintain and expand cooperative agreements with Seattle Public Schools and other public or private agencies to provide or expand access to open spaces they control and increase the tree canopy and green space they provide.
- P 5.1: Protect, restore, and expand urban forests and tree canopy on City-owned land, including rights-of-way, prioritizing frontline communities.
- T 4.10: Enhance the public street tree canopy and landscaping in the street right-of-way.

Maximizing tree canopy cover—particularly in areas with disadvantaged populations—would support the City's goal of developing a growth strategy that results in more equitable outcomes and reduces harm. By reducing the urban heat island effect, tree canopy cover enhances climate resiliency.

Diagrams in **Section 3.6 Land Use Patterns & Urban Form** and supporting appendices provide examples of how housing goals can be met while providing adequate space for preserved trees.

Regulations & Commitments

Under any of the alternatives, development projects would be designed and built in accordance with applicable federal, state, and local statutes and regulations (**Exhibit 3.3-7**). Many of these involve review and permitting processes to ensure impacts to the environment (including environmentally critical areas important to plants and animals) are avoided, minimized, documented, and mitigated ~~to the greatest extent possible~~. The procedures associated with these regulations also create opportunities for public notice and comment on projects before implementation. Regulations and commitments that address stormwater runoff are identified in **Section 3.1.3** in **Earth & Water Quality**.

Exhibit 3.3-7. Federal, State, and Local Regulations, Permits, and Processes Related to the Protection of Plants and Animals

Authority	Agencies with Jurisdiction	Requirements
Federal		
Migratory Bird Treaty Act	U.S. Fish and Wildlife Service (USFWS)	Prohibits the taking, killing, or possession of migratory birds or any parts, nests, or eggs of such birds, except as authorized by USFWS.
Bald and Golden Eagle Protection Act	USFWS	Prohibits the taking (including disturbance) of eagles or their nests, except as authorized by USFWS.
Clean Water Act Section 404	U.S. Army Corps of Engineers	Requires authorization for excavating, land clearing, or discharging dredged or fill material into waters of the United States, including wetlands.
Marine Mammal Protection Act	National Marine Fisheries Service (NMFS)	Prohibits injury or harm (including disturbance) to marine mammals, except as authorized by NMFS.
Endangered Species Act Section 7 Consultation	NMFS and/or USFWS	Requires federal agencies to ensure that actions they authorize (e.g., through issuance of a permit), fund, or carry out are not likely to jeopardize the continued existence of any endangered or threatened

Authority	Agencies with Jurisdiction	Requirements
		species or result in the destruction or adverse modification of critical habitat for those species.
Magnuson-Stevens Fishery Management and Conservation Act Consultation	NMFS	Requires a federal agency to consult with NMFS on a proposed activity authorized, funded, or undertaken by the agency, if the activity may adversely affect essential fish habitat (EFH) for federally managed commercially harvestable fish.
Washington State		
State Environmental Policy Act	Various	Requires state and local agencies to review proposals and identify environmental impacts; permits and approvals can be conditioned or denied, to mitigate or avoid the impacts identified through SEPA review.
State Hydraulic Code	Washington Department of Fish and Wildlife (WDFW)	Regulates activities that use, divert, obstruct, or change the natural flow or bed of waters (marine or fresh); project proponents must obtain a Hydraulic Project Approval, which ensures the work is done in a manner that protects fish life.
Clean Water Act Section 401	Washington State Department of Ecology	Requires certification for any projects that may result in a discharge into waters of the United States to ensure that the discharge complies with applicable state water quality requirements.
City of Seattle		
Environmentally Critical Areas Ordinance	City of Seattle Department of Construction & Inspections (SDCI)	Protects and regulates activities on or adjacent to critical areas; critical areas include geologic hazard areas, flood-prone areas, wetlands, and fish and wildlife habitat conservation areas (which include streams, riparian corridors, wildlife habitats mapped or designated by WDFW, corridors connecting priority habitats, and areas that support species of local importance).
Shoreline Master Program	SDCI	Regulates activities in and near major water bodies (e.g., rivers, large lakes, marine waters), establishes requirements for maintaining native vegetation.
Tree Protection Ordinance	SDCI	Limits the number, size, and type of trees that may be removed from private property and establishes requirements for replacing trees that are cut down.
City of Seattle SEPA Plants and Animals Policy	SDCI	Allows DPD to grant, condition, or deny construction and use permit applications for public or private proposals subject to SEPA review, with the goal of minimizing or preventing loss of wildlife habitat.
Land Use Regulations	SDCI	Specifies Green Factor requirements and street tree requirements for development in the Multifamily and Commercial zones and establishes tree requirements for development in Neighborhood Residential zones.

Source: Parametrix, 2023.

In March 2023, Mayor Harrell issued an Executive Order that addresses trees on City-owned property, identifying six measures for increasing the city's urban tree canopy:

- Create a One Seattle Tree Fund, collected from fee-in-lieu payments from developers and private property owners. The fund will target new tree plantings in areas with low canopy

cover, specifically historically underserved communities, along with parks and publicly owned rights-of-way.

- Expand public-private partnerships to support new, innovative funding mechanisms to maintain and expand urban forest on public lands and in publicly owned rights-of-way.
- Replace every healthy, site-appropriate tree removed from City-owned property within city limits with a minimum of three trees; replace every tree on City-owned property within city limits that has died or is otherwise hazardous or invasive with a minimum of two trees.
- Remediate unhealthy trees and trees creating conflicts.
- Steward City-managed forested watersheds outside of urban areas for the long-term provision of ecosystem services to the communities we serve, based on principles of diversity, equity, and inclusion and best available scientific knowledge.
- Report on urban area tree canopy expansion and protection progress through the annual Urban Forestry Progress Report.

Also, in May 2023, the Seattle City Council passed an ordinance that updates the existing Tree Protection Code and addresses urban forest on private property. The ordinance includes the following actions:

- Lower the size thresholds and provide stronger protections for trees subject to regulation.
- Increase planting requirements.
- Fund tree planting programs and address the lack of trees in historically underserved communities through establishment of a payment-in-lieu program to provide flexibility for homebuilders.
- Provide for development standard modifications through incentives to help avoid impacts to trees when possible.
- Create clear standards for tree protection during the review process.
- Expedite the permitting process.
- Establish a more simple and clear naming convention for tree categories.
- Restrict removal of heritage trees.
- Require the planting of street trees in urban neighborhood zones on parcels that are redeveloped.

Taken together, these policies and regulations are expected to minimize the potential for tree canopy loss in several ways. Enhanced restrictions on tree removal will reduce related canopy loss on private parcels, and tree replacement requirements will ensure that a substantial portion such losses are reversed over time. Moreover, requirements for tree planting in road rights-of-way may create opportunities for additional tree canopy development in areas that currently lack street trees.

The potential for canopy losses to affect disadvantaged populations will be reduced through the payment-in-lieu program. Revenue generated through that program will be used to plant and maintain new trees with a priority in census tracts with tree canopy cover of 25 percent or less

and on planting in public places. Given that areas with disadvantaged populations tend to have less canopy cover than other areas, the emphasis on planting in areas with low canopy cover will generate benefits for those populations.

Tree planting through the payment-in-lieu program may also provide some ecological and social benefits that would not be realized through on-site tree replacement. The program will allow the City to identify sites where restoration or creation of forest canopy will generate public benefits. For example, it will be possible to plant and maintain stands of trees in public places. Trees growing in groups or stands provide shade and habitat more effectively than single, isolated trees. In addition, when trees are planted in public places, benefits related to physical and mental health are more widely available. Moreover, the commitment of public resources to maintaining planted trees increases the likelihood of long-term survival. Such planning and coordination is not possible when individual trees are replaced on private parcels. By creating the opportunity for coordinated and consolidated planting and maintenance of trees, the payment-in-lieu program opens the door to strategic efforts that maximize the public benefits of trees.

Finally, the City was recently awarded $12.9 million in grant funding, to restore forested places near schools, parks, and low-income housing. The projects implemented through this funding will be designed to offset the effects of climate change, improve access to nature, and support green careers for young people.

Other Potential Mitigation Measures

Measures that may increase and enhance tree canopy cover include the following:

- Add an amenity area requirement in Neighborhood Zones, encouraging space for trees. (As of ~~Spring~~ early 2025~~4~~, the City anticipates adopting new zoning standards in Neighborhood Residential zones to allow for middle housing types).
- Utilize an adaptive management policy to collect, monitor, analyze, and learn from the results of code application and to assess the Tree Protection Code's effectiveness in achieving the goals of retaining or replanting trees and increasing canopy cover while allowing for more housing options. This policy fits with the City's goal of conducting citywide tree cover assessments every 5 years, which can inform adaptive management.
- Encourage attached units rather than detached units, which could result in more plantable area by eliminating small corridors between buildings. This option may be feasible in areas that would be classified as neighborhood center, urban neighborhood, or corridor under the action alternatives.
- Increase funding for City-led tree planting and maintenance in parks and rights-of-way, particularly in areas identified as heat islands.
- Expand existing programs such as Trees for Neighborhoods, which provides trees and support for people who want to plant trees on their property or in the adjacent right-of-way.

- Develop a comprehensive plan for investment in the equitable distribution and resilience of the urban forest.
- Investigate technologies such as flexible pavement, soil cells, expanded tree pits, and appropriate soil types in City-owned rights-of-way.
- Pursue creative approaches for maximizing green infrastructure in appropriate locations in City-owned rights-of-way—for example, installing planted bike lane and curb line buffer strips between curbs and sidewalks, or replacing parking spots and curb bulbs to support park-scale street trees.
- Collaborate with Seattle Public Schools and organizations such as Green Schoolyards America to increase tree cover on school grounds.

Potential measures for avoiding, minimizing, and mitigating development-related impacts on water quality are identified in **Section 3.1.3** in **Earth & Water Quality.** Possible additional measures for reducing the risk of delivering contaminants to ~~fish-bearing streams~~ surface waters include the following:

- Retrofit existing stormwater facilities to increase storage capacity and improve water quality treatment.
- Adopt stormwater detention standards that require new parcel development to detain larger volumes of stormwater runoff on-site and in a manner that mimics predeveloped stormwater patterns.
- Set lower development size thresholds to require more parcel projects to install on-site stormwater management.
- Set lower limits for the maximum percentage of a new development that could be covered with impervious surfaces.
- Encourage expanded use of soil amendments to facilitate stormwater infiltration (i.e., low-impact development practices) where technically feasible.
- Sponsor or encourage public education about the threats posed to fish by contaminants in stormwater runoff.
- Provide a stronger program for maintaining stormwater treatment and detention facilities.

3.3.4 Significant Unavoidable Adverse Impacts

Under any of the alternatives, population growth in Seattle will drive development and redevelopment of residential and commercial properties. As discussed above, differences in the availability or distribution of habitats in the city would be unlikely to result in any appreciable impacts on ~~regional~~ populations of plants or animals in or near Seattle. Based on this consideration, combined with the existing statutory and regulatory requirements that provide protection for plants and animals, none of the alternatives would be expected to result in impacts that would reduce the likelihood that populations of native plant or animal species would persist in or near Seattle~~of survival or recovery of a plant or animal species in the wild~~.

Similarly, none of the action alternatives would be expected to have significant, unavoidable adverse impacts on aquatic species and habitats. On-site stormwater management would likely be required for development or redevelopment projects within the city limits (see **Section 3.1.4** in **Earth & Water Quality**). Implementation of required stormwater management would occur under any of the alternatives. For these reasons, none of the action alternatives would be expected to result in an appreciable increase (compared to the No Action alternative) in the delivery of stormwater contaminants to ~~fish-bearing streams~~surface waters. This, in turn, would avoid or minimize the potential for adverse impacts on fish, wildlife, and their habitats.

Also, none of the action alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover. As discussed in **Section 3.3.3**, the City's current tree protection regulations minimize the potential for development-related loss of tree canopy cover and require mitigation for such tree loss. In addition, the potential for canopy loss due to other factors would be the same under all alternatives.

Finally, as discussed in the analysis of impacts common to all alternatives, encouraging residential and commercial development within the urban environment of Seattle could indirectly benefit tree canopy cover regionally by easing development pressure in less-developed areas outside the city. Increasing density in the city—particularly given the City's requirements for tree protection and replacement—would have fewer adverse impacts than would the conversion of undeveloped parcels in suburban areas to low-density residential uses.

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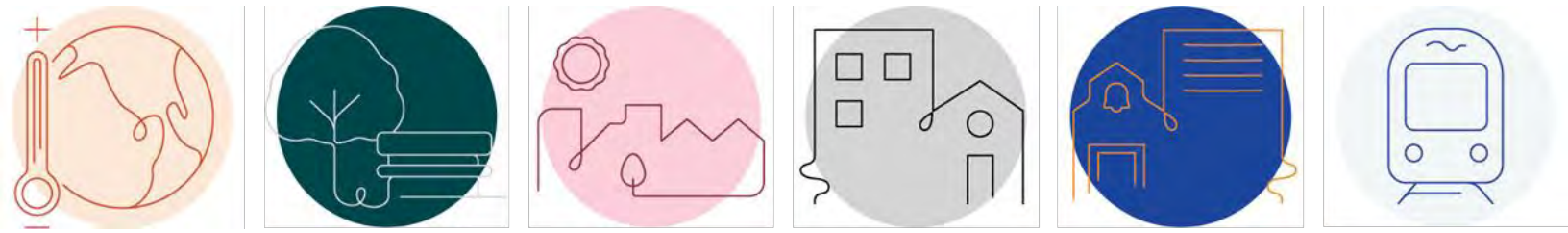
3.4 Energy & Natural Resources



Source: City of Seattle, 2023.

This section addresses the affected environment, impacts to the environment, mitigation measures, and significant unavoidable adverse impacts related to energy and other natural resources for the One Seattle Comprehensive Plan Update.

Thresholds of significance utilized in this impact analysis include:

- Energy usage in excess of projected supply availability.
- Conflict with energy policies adopted by the City of Seattle.

3.4.1 Affected Environment

This section characterizes the affected environment with respect to energy and natural resources for the City of Seattle, beginning with a summary of the major regulations relating to energy and a review of existing energy resources.

Current Policy & Regulatory Framework

Federal

National Energy Conservation Policy Act

The National Energy Conservation Policy Act serves as the underlying authority for federal energy management goals and requirements. Signed into law in 1975, it has been regularly updated and amended by subsequent laws and regulations. Pursuant to the Act, the National Highway Traffic Safety Administration is responsible for establishing additional vehicle standards. In 2012, new fuel economy standards for passenger cars and light trucks were approved for model years 2017 through 2021 (77 Federal Register [FR] §§62624–63200). Fuel economy is determined based on each manufacturer's average fuel economy for the fleet of vehicles available for sale in the United States.

Energy Policy Act of 2005

The Energy Policy Act of 2005 seeks to reduce reliance on non-renewable energy resources and provide incentives to reduce current demand on these resources. For example, under this Act, consumers and businesses can obtain federal tax credits for purchasing fuel-efficient appliances and products, including buying hybrid vehicles, building energy-efficient buildings, and improving the energy efficiency of commercial buildings. Additionally, tax credits are available for the installation of qualified fuel cells, stationary microturbine power plants, and solar power equipment.

Regional Plans & Regulations

The Pacific Northwest Electric Power Planning and Conservation Act (Northwest Power Act) (16 U.S. Code [U.S.C.] Chapter 12H; Public Law No. 96-501) was passed in 1980 and amended in 1996-97. The intent of the law is to promote and support:

- Conservation and efficiency in the use of electrical power
- Development of renewable resources within the Pacific Northwest
- Adequate, efficient, economical, and reliable power supplies for the region
- Orderly planning for regional power systems
- Development of regional plans and programs related to energy conservation, renewable resources; and protection, mitigation, and enhancement of fish and wildlife resources

This law includes specific requirements for utilities to undertake energy conservation programs, pay for mitigation of impacts caused by power transmission and distribution, and develop renewable resources as part of their overall resource mix. It also established the Northwest Power Planning Council (NPPC) as the regional planning agency for Idaho, Montana, Oregon, and Washington. The NPPC goals, as defined by the Northwest Power Act, are to work cooperatively with the states to manage the hydroelectric generating capacity and natural resources of the Columbia River Basin as well as other regional energy systems.

The NPPC's energy planning for the region is guided by the *Northwest Conservation and Electric Power Plan*, now in its eighth revision, which was updated in 2021 (NPCC, 2022). The plan includes detailed recommendations and strategies for furthering already active conservation programs by state and local governments, for ensuring research and development (as well as implementation and funding) of renewable energy resources, and for protecting the environment from impacts associated with electric power generation.

State Regulations

The Washington State Energy Code (Chapter 19.27A RCW) was adopted in 1990. Its intent was to establish building standards that bring about the common use of energy-efficient building methods and to assure that such methods remain economically feasible and affordable. In 2009, the State Legislature adopted the Climate Pollution Reduction and Energy Efficiency Act which requires the adoption of state energy codes that incrementally move towards achieving the seventy percent reduction from a 2006 baseline in annual net energy consumption for buildings by 2031.

The energy code is designed to require new buildings to meet a specified level of energy efficiency while allowing flexibility in building design, construction, and heating equipment efficiencies within that framework. As required by state law, each update is designed to impose more stringent standards to reduce energy consumption in buildings. ~~The standards of the energy code primarily dictate requirements for building insulation and in a 2022 update, now include the use of all-electric space and water heating in new commercial and multifamily construction.~~The 2021 Washington State Energy Code went into effect in 2024.

Washington State Clean Buildings Performance Standard (CBPS): The legislature passed clean building laws in 2019 (HB 1257) and 2022 (SB 5722) to create an energy performance standard for non-residential buildings larger than 50,000 square feet and require energy management planning, operations and maintenance and tracking energy use over time for non-residential buildings larger than 20,000 square feet and multifamily buildings over 50,000 square feet.

Local Regulations & Policies

City of Seattle Energy Code

Seattle's building and energy codes include energy-efficiency standards for residential and nonresidential buildings. ~~Similar to~~Closely modeled on state regulations, these standards also dictate requirements for the building ~~insulation~~ envelope, Heating, Ventilation and Air Conditioning (HVAC) systems, water heating, lighting, and metering.~~and fuel efficiency for heat sources.~~ Under state law, all local jurisdictions must adopt the requirements of the Washington State Energy Code for residential buildings but may impose ~~, although the code allows for local standards to prevail if they are more restrictive than the state standards~~more stringent standards for nonresidential buildings.

The 2021 ~~update to the 2018~~ Seattle ~~Building~~ Energy Code ~~is effective beginning~~went into effect ~~July 1~~November 15, ~~2023~~2024. The 2021 update largely matches the 2021 Washington State Energy Code, including adoption of the new "fossil fuel compliance path." Some updates to the nonresidential Energy Code provide greater efficiency than both the 2018 Seattle Energy Code and the 2021 Washington State Energy code. Other updates provide greater flexibility for existing buildings.~~Updates apply to commercial and large multifamily buildings (4+ stories) and include the elimination of gas and most electric resistance space heating systems, eliminates gas water heating in large multifamily buildings and hotels, improves building exteriors to improve energy efficiency and comfort, creates more opportunity for solar power, and requires electrical infrastructure necessary for future conversion of any gas appliances in multifamily buildings (City of Seattle, 2021).~~

Seattle Climate Action Plan

The 2013 Seattle Climate Action plan laid groundwork for buildings emissions targets for 2030 (City of Seattle, 2013). This included target distinctions between building types. Commercial buildings have a goal of 45% reduction in CO_2e emissions and a 10% reduction in energy use by 2030 as compared to 2008 baseline emissions. Residential buildings have similar goals, with a 32% reduction in CO_2e and 20% reduction in energy use by 2030. For both combined commercial and residential, greenhouse gas intensity, measured in $MTCO_2e$ per British Thermal Unit (BTU) have a reduction target of 25% by 2030. For multifamily residential and commercial buildings, there is also the target for 50% of permitted new construction projects achieve one of the following green building standards by 2025: Living Building Challenge, Built Green, LEED, Evergreen Sustainable Development Standard, or Passive House.

The 2018 updated climate action strategy offered additional measures, such as the goal of buildings to be carbon neutral by 2050 (City of Seattle, 2018). The Seattle City Council also enacted the Green New Deal Resolution which calls for a Seattle free of climate pollutants by 2030 (City of Seattle, 2022). See **Section 3.2 Air Quality & GHG Emissions** for more detail.

Building Tune-Ups

A key piece of the Seattle Climate Action Plan is the Tune-Ups legislation (Seattle Municipal Code 22.930), adopted March 2016. Through building tune-ups, energy and water performance can be optimized by identifying low- or no-cost actions related to building operations and maintenance. Examples of operation tune-ups to an existing building include changes to thermostat set points or adjusting lighting or irrigation schedules. Tune-ups also review HVAC, lighting, and water systems to identify needed maintenance, cleaning, or repairs. On average, building tune-ups can generate 10 to 15% savings in energy costs (City of Seattle, 2023). Tune-ups are required every five years for commercial buildings 50,000 square feet or larger.

Building Emissions Performance Standards

Existing buildings over 20,000 square feet must meet building performance standards (BPS) over time to improve energy efficiency and reduce climate impacts. Seattle has recently enacted legislation to create a Building Emissions Performance Standard (BEPS)for existing commercial and multifamily buildings larger than 20,000 square feet (City of Seattle, 2023). This Building Emissions Performance Standard (BEPS) includes standard greenhouse gas intensity targets (GHGITs) for different building activity types (e.g., office, retail, multifamily) for each compliance interval until net-zero emissions targets in 2050 (City of Seattle, 2023). The BEPS sets required GHGITs through 2035 and provisional targets from 2036-2050 to enable owners to plan, while allowing the later targets to be revised, if needed, by future rules updates.

Energy Benchmarking

Buildings account for more than one third of Seattle's core greenhouse gas emissions (City of Seattle, 2023). Owners of non-residential and multifamily buildings (20,000 square feet or larger) are required to track energy performance and report annually to the City of Seattle pursuant to Seattle's Energy Benchmarking Law (Seattle Municipal Code 22.920). Through this tracking and reporting program, inefficiencies and opportunities to reduce energy waste and emissions are highlighted. Other benefits of benchmarking include:

- Shows how buildings are used—and wasting—energy.
- Helps businesses and consumers make more informed decisions that take energy costs into account when buying or renting property.
- Lowers energy costs, reduces greenhouse gas impacts, and creating jobs in the energy services and construction trades.
- Establishes energy performance ranges for Seattle building types based on their reported energy use.

- Allows the City of Seattle to track its energy reduction goals and target incentive dollars by market sector.

Regional Availability of Energy

Transportation Energy

Refined petroleum products such as gasoline and diesel are used primarily for transportation purposes. Approximately 54% of petroleum resources delivered to the State of Washington refineries are from domestic crude oil (primarily Alaska) and approximately 30% is imported from Canada with Canadian supplies making up for declines in supply from Alaska (Washington Department of Commerce, 2013). The production and pricing of petroleum products is driven by global demand and consumption. Unpredictable events such as the state of the global financial system, political turmoil, and refinery and pipeline accidents can affect production and pricing.

Seattle City Light

Seattle City Light (SCL) is one of the nation's largest municipally owned utilities serving more than 420,000 homes and 49,000 businesses throughout Seattle, Shoreline, Lake Forest Park, Burien, Renton, Tukwila, SeaTac, Normandy Park, and Unincorporated King County (Seattle City Light, 2023a).

SCL owns seven hydroelectric facilities in Washington and delivers electricity through a network of approximately 2,330 miles of distribution circuit and 16 major substations (Seattle City Light, 2023b). Power resources consist of 90% hydropower with approximately half of which is supplied by facilities owned by Seattle City Light. The remaining is purchased from the Bonneville Power Administration (BPA) (Seattle City Light, 2022). The Integrated Resource Plan (IRP) anticipates baseline load forecasts for the next 10 years to be an increase of approximately 0.5% per year. A rapid electrification scenario was considered, based on the Electric Power Research Institute's 2022 Electrification Assessment, which has the load increase by 32% compared to the baseline scenario. To account for this, a top portfolio plan of new resource additions was created. Long term demand during summer peaks when hydroelectric resources run low is met through solar energy from eastern Washington and Oregon.

The 2022 IRP also outlines the need to pursue acquisition of additional resources such as local commercial or community solar projects that will diversify sources of weather-dependent generation and transmission uncertainty, offshore and Montana wind in the 2030s with winter peaking generation profiles to help meet expected increases in seasonal demand and demand response programs, which will help the utility manage short-term peaks in electricity demand.

Anticipated increases in winter peak demands due to electrification (reduced use of natural gas for heating) combined with an increasing frequency of weather extremes associated with climate

change additional resources such as batteries, hydrogen, geothermal, small modular/advanced nuclear, etc., could be considered to maintain current levels of grid reliability.

Puget Sound Energy

Puget Sound Energy (PSE) is Washington state's oldest local energy company and serves approximately 900,000 natural gas customers in 6 counties (PSE, 2023b). These include parts of King (not Enumclaw), Kittitas (not Ellensburg), Lewis, Pierce, Snohomish, and Thurston counties.

PSE controls its gas-supply costs by acquiring gas, under contract, from a variety of gas producers and suppliers across the western United States and Canada. About half the gas is obtained from producers and marketers in British Columbia and Alberta, and the rest comes from Rocky Mountain states. Once PSE takes possession of the gas, it is distributed to customers through more than 26,000 miles of gas mains and service lines (PSE, 2023a).

Energy Usage

Building Energy

Energy usage is typically quantified using Btu. Development within the City of Seattle under all alternatives will primarily be comprised of commercial, industrial, and residential. Energy consumption of these land use types is by the energy use intensity (EUI), which is defined as a building's energy use as a function of its size or other characteristics and is measured by thousand Btu per square foot (kBtu/sf). The lower the EUI, the better the energy performance of a building. As discussed above, owners of non-residential and multifamily buildings (20,000 square feet or larger) are required to track energy performance and report annually to the City of Seattle pursuant to Seattle's Energy Benchmarking Law (Seattle Municipal Code 22.920). **Exhibit 3.4-1** lists the average~~median~~ EUI by land use type based on 202~~0~~3 benchmarking data.

Exhibit 3.4-1. Energy Usage by Land Use, Excluding Single Family

Land Use Type	Building EUI (kBTU/sf)
~~Laboratory~~	~~197.2~~
~~Hospital~~	~~191.8~~
~~Supermarket/Grocery Store~~	~~183.6~~
~~Restaurant~~	~~150.8~~
~~Medical Office~~	~~73.9~~
~~College/University~~	~~73.4~~
~~Other~~	~~62.7~~
~~Mixed Use Property~~	~~56.3~~
~~Hotel~~	~~48.7~~
~~High-Rise Multifamily~~	~~44.6~~

Land Use Type	Building EUI (kBTU/sf)
~~Large Office~~	~~43.2~~
~~Retail Store~~	~~43.2~~
~~Small- and Mid-Sized Office~~	~~42~~
~~Refrigerated Warehouse~~	~~37.8~~
~~Residence Hall/Dormitory~~	~~35.7~~
~~Mid-Rise Multifamily~~	~~33.1~~
~~K-12 School~~	~~32.9~~
~~Low-Rise Multifamily~~	~~29.8~~
~~Worship Facility~~	~~29.8~~
~~Non-Refrigerated Warehouse~~	~~29.2~~
~~Distribution Center~~	~~24.5~~
~~Self-Storage Facility~~	~~11.8~~
Data Center	780.5
Supermarket/Grocery Store	230.7
Restaurant	205.3
Laboratory	203.2
Urgent Care/Clinic/Other Outpatient	194.5
Hospital	177.0
Mixed Use Property	116.0
Medical Office	109.3
Wholesale Club/Supercenter	101.3
College/University	86.9
Strip Mall	81.8
Enclosed Mall	79.2
Office	75.9
Hotel	75.0
Library	69.3
Manufacturing/Industrial Plant	67.5
K-12 School	55.3
Distribution Center	51.9
Residence Hall/Dormitory	49.5
Multifamily Housing	44.9
Refrigerated Warehouse	44.8
Worship Facility	36.1
Non-Refrigerated Warehouse	35.9
Self-Storage Facility	18.9

Source: City of Seattle, 2023~~0~~.

Total energy usage in Washington was 1,571.4~~779.4~~ trillion Btu in 202~~0~~2 (U.S. EIA, 2024~~20~~). Electricity and natural gas in Washington are generally consumed by stationary users such as residences, commercial, and industrial facilities, whereas petroleum consumption is generally accounted for by transportation-related energy use. The electricity and natural gas consumption attributable to the State is provided by the U.S. Energy Information Administration (U.S. EIA) data. In the year 202~~0~~2, Washington State consumed approximately ~~1,779~~310 trillion btu of electricity (U.S. EIA, 2024~~0a~~) and approximately 351~~39~~ trillion btu of natural gas (U.S. EIA, 2024~~3~~).

Automotive Fuel

Automotive fuel consumption for all on-road transportation in the State of Washington provided by the U.S. Energy Information Administration (U.S. EIA) data. According to the U.S. EIA, the State of Washington consumed approximately 258.2 trillion Btu of motor gasoline, 150 trillion Btu of diesel, 0.1 trillion Btu of natural gas (for motor fuel), and 20.3 trillion Btu of fuel ethanol in 2020 (U.S. EIA, 2020a and U.S. EIA, 2023).

Federal programs are mandating improved fuel economy for passenger cars and light trucks. Transportation-related emissions in 2044 would be lower as compared to existing conditions due to improvements in fuel economy. The National Highway Traffic and Safety Administration (NHTSA) is responsible for establishing vehicle standards and for revising existing standards. Compliance with Federal fuel economy standards is not determined for each individual vehicle model. Rather, compliance is determined based on each manufacturer's average fuel economy for the portion of their vehicles produced for sale in the United States. On March 31, 2022, the NHTSA finalized their Corporate Average Fuel Economy (CAFÉ) standards for model years 2024 to 2026. The final rule requires an industry-wide fuel average of approximately 49 miles per gallon (mpg) for passenger cars and light trucks in model year 2026 by increasing fuel efficiency by 8% annually for model years 2024 and 2025 and 10% for model year 2026 (NHTSA, 2023).

Washington State adopted a new rule in December 2022 that requires new ZEV sales of passenger cars, light-duty trucks, and medium-duty vehicles to 100% starting in 2035. ZEVs do not require diesel, gasoline, natural gas, or ethanol. Progress toward 100% ZEV sales in 2035 would increase the rate of registration of ZEVs in Seattle, resulting in reduced automotive fuel consumption and the need for charging infrastructure.

3.4.2 Impacts

Impacts Common to All Alternatives

Construction Impacts

Future growth under any alternative would result in development of new residential, retail, light industrial, office, and commercial use. Construction of future development within the City would result in the consumption of energy in two general forms: (1) the fuel energy consumed by construction vehicles and equipment; and (2) bound energy in construction materials, such as asphalt, steel, concrete, pipes, and manufactured or processed materials such as lumber and glass.

Fossil fuels for construction vehicles and other energy-consuming equipment would be used. Fuel energy consumed during construction would be temporary in nature and would not represent a significant demand on energy resources. Some incidental energy conservation would occur during construction through compliance with engine emissions standards implemented by the United States Environmental Protection Agency (EPA).

Substantial reductions in energy inputs for construction materials can be achieved by selecting building materials composed of recycled materials that require substantially less energy to produce than non-recycled materials. The incremental increase in the use of energy bound in construction materials would not substantially increase demand for energy compared to overall local and regional demand for construction materials. It is reasonable to assume that production of building materials would employ all reasonable energy conservation practices in the interest of minimizing the cost of doing business.

Operational Impacts

Transportation Energy Demand

As discussed in **Section 3.2 Air Quality & GHG Emissions**, mobile emissions were estimated using the EPA's Motor Vehicle Emission Simulator (MOVES) model. The MOVES model defaults include assumptions for vehicle fuel type including gasoline, diesel, compressed natural gas (CNG), and ethanol. Projected vehicle miles traveled (VMT) by passenger vehicles, trucks, and buses were used to estimate annual transportation energy usage.

A mix of land uses is associated with reduced VMT (WSDOT, 2013). Diversity in land uses combined with increased density within an urban area can lead to shorter trip distances and greater use of walking, as well as the reduced need for vehicle ownership. Accessibility to a variety of trip purposes, as in mixed use developments, may induce additional trips; however, these trips are shorter and are more likely to be made by walking than trips in areas where mixed land uses are not available. Travel demand models include findings about projected VMT in future years for various classes of vehicles (e.g., cars, trucks, buses). The model generally

assumes continuation of current economic and demographic trends, with minor shifts toward shorter trips and more trips made by modes other than automobile travel. Improvements in fuel efficiency combined with reductions in VMT would contribute to reductions in transportation fuel demand on a per capita basis.

Exhibit 3.4-2 summarizes VMT associated with each alternative. See **Exhibit 3.4-3** for a comparison of annual fuel usage for existing, Alternative 1, Alternative 2, Alternative 3, ~~and~~ Alternative 5, and the Preferred Alternative in units of trillion British Thermal Units (Btu). The difference between Existing and Alternative 1 (No Action) is the increase in annual vehicle miles traveled over the 20-year planning horizon.

Exhibit 3.4-2. Annual Vehicle Miles Traveled by Alternative

	Existing	Alt. 1	Alt. 2	Alt. 3	Alt. 4*	Alt. 5	Preferred
Cars	20,332,000	22,213,000	22,532,000	22,382,000	22,532,000	22,920,000	22,969,000
Trucks	1,871,300	2,144,100	2,166,900	2,211,100	2,166,900	2,202,100	2,247,800
Buses	68,930	77,150	77,140	77,140	77,140	77,140	77,140
Total VMT**	**22,272,230**	**24,434,250**	**24,776,040**	**24,670,240**	**24,776,040**	**25,199,240**	**25,293,940**

Note: The Preferred Alternative was added to this exhibit since the Draft EIS—no edits were made to Alternatives 1–5.
* Traffic data is not available for Alternative 4 because the projected VMT would fall between Alternative 2 and Alternative 3. For purposes of the analysis, it has been assumed that Alternative 4 VMT is equivalent to Alternative 2, which is higher than Alternative 3.
VMT in **Section 1.6.10 and **Section 3.10 Transportation** excludes buses.
Source: Fehr & Peers, 2024~~3~~.

Exhibit 3.4-3. Annual Transportation Fuel Usage (Trillion Btu)

	Existing	Alt. 1	Alt. 2	Alt. 3	Alt. 4*	Alt. 5	Preferred**
Gasoline	0.3471	0.34	0.35	0.35	0.35	0.36	0.36
Diesel	0.0141	0.02	0.02	0.02	0.02	0.02	0.02
CNG	0.0001	0.0002	0.0002	0.0002	0.0002	0.0002	0.0002
Ethanol	0.0006	0.0006	0.0006	0.0006	0.0006	0.0007	0.0007

Note: The Preferred Alternative was added to this exhibit since the Draft EIS—no edits were made to Alternatives 1–5.
* Traffic data is not available for Alternative 4 because the projected VMT would fall between Alternative 2 and Alternative 3. For purposes of the analysis, it has been assumed that Alternative 4 VMT is equivalent to Alternative 2, which is higher than Alternative 3.
** Growth under Alternative 5 and the Preferred Alternative would be the same. The difference in the allocation of growth results in differing trip patterns and VMT. VMT under the Preferred Alternative would be approximately 0.38% greater than Alternative 5. Preferred Alternative fuel usage estimates have been estimated by increasing Alternative 5 fuel usage by 0.38%.
Source: Kimley-Horn, 2024~~3~~.

Building Energy Demand

Increases in development would increase population and employment in the City of Seattle and would increase energy consumption. Development within the City of Seattle under all alternatives

will primarily be comprised of commercial, industrial, and residential. All new development or redevelopment would be designed and constructed to meet the applicable state and City building and energy conservative code requirements which would reduce energy consumption as compared to prior structures which likely used more energy consumption on a pro rata basis. A mixture of newer and older development would likely be more energy efficient than existing development, based on changes to building codes, innovations in building and technologies, and compliance with City energy conservation measures such as regular building tune-ups.

Residential energy demand for each alternative has been estimated based on EIA annual end-use consumption data for various housing types in the western United States (U.S. EIA, 2015).

~~All-electric space and water heating is required by the 2022 Washington Energy Code. According to household end-use consumption data, approximately 13% of natural gas consumption in residential uses is for purposes other than space and water heating (U.S. EIA, 2015).~~ Natural gas consumption from new building square footage due to ~~target~~ growth under each alternative is summarized in **Exhibit 3.4-5.** See **Appendix E** for detailed calculations and assumptions.

Non-residential consumption has been estimated based on 2020 data on building energy benchmarking for industrial and commercial uses (all non-industrial uses have been assumed to be commercial) (City of Seattle, 2020). Based on benchmark data, it is assumed that commercial uses would consume approximately 47.1 kBtu/SF of electricity and 16.6 kBtu/SF of natural gas and industrial uses would consume approximately 20.8 kBtu/SF of electricity and 10.4 kBtu/SF of natural gas. Estimated increases in electricity usage from new building square footage due to ~~target~~ growth under each alternative is summarized in **Exhibit 3.4-4**. Compared to existing energy per capita energy usage of 0.0002 trillion Btu electricity and 0.00004 trillion Btu natural gas per capita in the State, per capita energy demand of all alternatives would be lower.[21] See **Appendix E** for detailed calculations and assumptions.

Exhibit 3.4-4. Increase in Building Energy Demand—Electricity (trillion Btu)

	Alt. 1	Alt. 2	Alt. 3	Alt. 4	Alt. 5	Preferred
Residential	1.29	1.58	1.64	1.61	1.91	2.08
Commercial	1.56	1.56	1.56	1.56	1.56	1.56
Industrial	0.37	0.37	0.37	0.37	0.37	0.37
Total Demand	3.22	3.51	3.58	3.54	3.84	4.01
Percent of Statewide Consumption	0.18%	0.20%	0.20%	0.20%	0.22%	0.23%
Per Capita Electricity Demand*	**0.000020**	**0.000017**	**0.000017**	**0.000017**	**0.000016**	**0.000016**

Note: The Preferred Alternative was added to this exhibit since the Draft EIS—no edits were made to Alternatives 1–5.
* Per capita demand based on projected population increase.
Source: Kimley-Horn, 2024~~3~~.

[21] Statewide per capita energy demand calculated based on U.S. EIA consumption data (2020) and 2020 Census population estimates.

Exhibit 3.4-5. Building Energy Demand—Natural Gas (trillion Btu)

	Alt. 1	Alt. 2	Alt. 3	Alt. 4	Alt. 5	Preferred
Residential	~~0.17~~1.29	~~0.21~~1.58	~~0.21~~1.64	~~0.21~~1.61	~~0.25~~1.91	2.04
Commercial	0.55	0.55	0.55	0.55	0.55	0.55
Industrial	0.18	0.18	0.18	0.18	0.18	0.18
Total Demand	~~0.90~~2.02	~~0.94~~2.32	~~0.95~~2.38	~~0.94~~2.34	~~0.98~~2.65	2.77
Percent of Statewide Consumption	0.27%	0.28%	0.28%	0.28%	0.29%	0.29%
Per Capita Natural Gas Demand*	**0.0000~~055~~ 123**	**0.0000113 ~~046~~**	**0.0000116 ~~046~~**	**0.0000114 ~~046~~**	**0.0000108 ~~040~~**	**0.0000113**

Note: The Preferred Alternative was added to this exhibit since the Draft EIS—edits to Alternatives 1–5 are shown in tracks.
* Per capita demand based on projected population increase.
Source: Kimley-Horn, 2024~~3~~.

All future development would be required to adhere to energy efficiency standards combined with increased efficiency through performance requirements of the 2022 Washington Energy Code and 2018 Seattle Energy Code ~~fostered by the Climate Action Plan and all-electric space and water heating required by the 2022 Washington Energy Code~~.

Equity & Climate Vulnerability Considerations

Based on the City's Climate Change Vulnerability Assessment (2023), the effect of climate change on buildings and energy and the community include energy supply disruptions, electricity transmission damage and interruptions, and energy demand increases. Some highlights of potential effects include:

- Seattle has a relatively higher percentage of households without air conditioning (46%), and the lack of cooling capacity could affect residents particularly in older buildings. As new buildings are constructed, measures to promote building and site design that promote passive cooling may be appropriate. All alternatives have this potential to address cooling needs with Alternative 1 having lower numbers of dwellings than Alternatives 2-4 and Alternative 5 the most.
- Extreme heat events will create increased energy demand for cooling while decreasing capacity and efficiency of energy systems as transmission lines and substations are stressed.
  - Energy demand from buildings is lowest under Alternative 1 and greatest under the Preferred Alternative ~~5~~ due to the range of housing growth estimated 80,000 to 120,000 new units. **Exhibit 3.4-4** and **Exhibit 3.4-5.** Among Alternatives 2 through 4 with the same growth of 100,000 new dwellings but different patterns and types of housing, Alternatives 2 and 4 have lower building energy demand with more compact housing types in neighborhood centers and corridors compared to Alternative 3 with more distributed housing in urban neighborhoods.

  - The Climate Change Vulnerability Assessment notes that energy systems in south Seattle are most likely to be affected because this area is more prone to urban heat islands and the impacts of extreme heat. Under all alternatives, there is a potential to modify urban heat islands through the addition or reduction of tree canopy additions. Alternatives 5 and 3 have higher residential growth planned in Area 8 than Alternatives 1, 2, and 4 and the Preferred Alternative. See **Section 3.3 Plants & Animals**.
- Businesses would be subject to increasing costs for insurance, energy, and materials. Small businesses are more vulnerable to climate change impacts than larger businesses. Businesses would be affected by lost labor hours due to extreme heat events. There may be additional burden on some small businesses that may experience brown outs or demand-driven energy price increase. Downtown in Area 4 has the highest number of small businesses presently. While housing growth in Area 4 is the same across the alternatives the action alternatives assume 15% of jobs would be distributed in proportion to residential growth which would increase retail and services jobs to serve the neighborhoods likely in the form of small businesses. Climate vulnerability strategies to address small businesses could support existing and new businesses in all areas.

Impacts of Alternative 1: No Action

Under Alternative 1 future growth would continue based on continuation of the 2035 Comprehensive Plan, with a target housing growth of 80,000 dwelling units for the planning horizon to 2044. New housing would consist primarily of rental apartments concentrated in existing mixed-use areas. Approximately 46% of housing growth would occur within urban centers, approximately 18% would occur within residential urban villages, approximately 16% would occur within hub urban villages, approximately 3% would occur in manufacturing industrial and maritime industrial areas, and the remaining 17% of growth would occur outside designated villages.

Construction Energy Use

As discussed above, construction of future development would result in the consumption of energy in two general forms: (1) the fuel energy consumed by construction vehicles and equipment; and (2) bound energy in construction materials. Implementation of the project is considered a non-project action. Energy demand associated with future development cannot be determined on a program level as construction activities are project-specific. Therefore, a comparative discussion of construction energy consumption is based on projected housing units demolished and target housing growth under each of the alternatives. Alternative 1 would result in the least amount of demolished housing units and the lowest ~~target~~ growth compared to all other alternatives. Therefore, energy consumption associated with construction vehicles and construction materials would likely be the lowest among all alternatives.

Operational Energy Use

Transportation Energy Use

As shown in **Exhibit 3.4-2**, growth associated with Alternative 1 would generate approximately 24.4 million VMT for cars and trucks and approximately 77,000 VMT for buses. Based on model outputs, Alternative 1 would require 0.34 trillion Btu of gasoline, 0.02 trillion Btu of diesel, 0.0002 trillion Btu of natural gas, and 0.0006 Btu of ethanol to accommodate projected citywide VMT.

As shown in **Exhibit 3.4-6,** implementation of Alternative 1 would result in a reduction in gasoline and ethanol fuel consumption and an increase in diesel and CNG consumption with regards to transportation fuel compared to existing conditions. Although Alternative 1 would result in an increase in VMT when compared to existing conditions, reductions in fuel consumption are largely due to improvements in fuel efficiency standards and increase electrification. In addition, net fuel consumption associated with Alternative 1 growth would constitute less than 1% of statewide fuel consumption. Therefore, increases in transportation energy associated with Alternative 1 implementation would not result in consumption of energy in excess of projected supply availability.

Exhibit 3.4-6. Net Annual Transportation Fuel Usage—Alternative 1 (Trillion Btu)

	Existing	Alternative 1	Net Change in Fuel Consumption	% of Statewide (2020) Consumption
Gasoline	0.3471	0.3381	-0.0090	-0.003%
Diesel	0.0141	0.0202	0.0065	0.004%
CNG	0.0001	0.0002	0.0001	0.448%
Ethanol	0.0006	0.0006	-0.0013	-0.006%

Source: Kimley-Horn, 2023

Building Energy Use

As discussed above, a total of 310~~1,779.4~~ trillion Btu of electricity was consumed statewide in 202~~0~~2. A total of 3.22 trillion Btu per year will be required to serve the target housing and employment growth under Alternative 1 on an annual basis. This constitutes approximately 1.04~~0.18~~% of statewide usage in 2022~~0~~, which is nominal compared to existing statewide demand. Therefore, increases in electricity consumption associated with Alternative 1 implementation would not result in consumption of energy in excess of supply availability and would result in a less than moderate impact.

As discussed above, a total of 351~~39.3~~ trillion Btu of natural gas was consumed statewide in 202~~0~~2. A total of 2.02~~0.90~~ trillion Btu per year will be required to serve the target housing and employment growth under Alternative 1. This constitutes approximately 0.58~~27~~% of statewide usage, which is nominal compared to existing statewide demand. Therefore, increases in natural gas consumption associated with Alternative 1 implementation would not result in

consumption of energy in excess of supply availability and would result in a less than moderate impact.

130th/145th Station Area

Under Alternative 1, zoning designations would be retained within the 130th/145th Station Area and no new areas will be designated for mixed-use or higher density than exists under existing conditions. The future light rail station at 130th would be developed in an area that would allow three-story single-purpose residential development and four- to eight-story multifamily in the land surrounding the future 145th BRT Station. Implementation of Alternative 1 assumes a growth potential of 840 housing units and 716 jobs, requiring approximately 0.02 trillion Btu of electricity and 0.005 trillion Btu of natural gas per year. This constitutes approximately 0.001% and 0.005~~1~~% of statewide electricity and natural gas usage, respectively. Therefore, impacts on supply availability related to existing conditions would be nominal.

Impacts of Alternative 2: Focused

Under Alternative 2, areas of focused growth called neighborhood centers would create more housing around shops and services, allowing for a wide range of housing types. The target housing growth under this alternative is 100,000 dwelling units. Approximately 37% of housing growth would occur within regional centers, approximately 24% would occur within neighborhood centers, 15% would occur within residential urban center, 13% would occur within hub urban center, 2% would occur within manufacturing industrial and maritime industrial, and 9% would occur outside designated villages.

Construction Energy Use

Alternative 2 would result in a greater number of demolished housing units compared to Alternative 1 and less than Alternatives 3, 4, and 5 and the Preferred Alternative. Alternative 2 would result in greater ~~target~~ growth compared to Alternative 1, the same as Alternatives 3 and 4, and less than Alternative 5 and the Preferred Alternative. Therefore, energy consumption associated with construction vehicles and construction materials under Alternative 2 would likely be greater than Alternative 1 and lower than Alternatives 3, 4, and 5 and the Preferred Alternative.

Operational Energy Use

Transportation Energy Use

As shown in **Exhibit 3.4-2**, growth associated with Alternative 2 would generate approximately 24.7 million VMT for cars and trucks and approximately 77,000 VMT for buses. Based on model outputs, Alternative 2 would require 0.35 trillion Btu of gasoline, 0.02 trillion Btu of diesel,

0.0002 trillion Btu of natural gas, and 0.0006 Btu of ethanol to accommodate projected VMT. Demand for Alternative 2 would be slightly higher than Alternative 1.

As shown in **Exhibit 3.4-7,** implementation of Alternative 2 would result in a reduction in ethanol fuel consumption and an increase in gasoline, diesel, and CNG consumption compared to existing conditions. Although Alternative 2 would result in an increase in VMT when compared to existing conditions and Alternative 1, increases in fuel consumption compared to Alternative 1 would be similar largely due to improvements in fuel efficiency standards and increase electrification. In addition, net fuel consumption associated with Alternative 2 growth would constitute less than 1% of statewide fuel consumption. Therefore, increases in transportation energy associated with Alternative 2 implementation would not result in consumption of energy in excess of projected supply availability.

Exhibit 3.4-7. Net Annual Transportation Fuel Usage—Alternative 2 (Trillion Btu)

	Existing	Alternative 2	Net Change in Fuel Consumption	% of Statewide (2020) Consumption
Gasoline	0.3471	0.3478	0.0007	0.0003%
Diesel	0.0141	0.0207	0.0065	0.004%
CNG	0.0001	0.0002	0.00005	0.464%
Ethanol	0.0006	0.0006	-0.0013	-0.008%

Source: Kimley-Horn, 2023.

Building Energy Use

As discussed above, a total of 310~~1,779.4~~ trillion Btu of electricity was consumed statewide in 2022~~0~~. A total of 3.51 trillion Btu per year will be required to serve the target housing and employment growth under Alternative 2. This constitutes approximately 1.13~~0.20~~% of statewide usage, which is nominal compared to existing demand. Although growth ~~targets~~ between Alternative 2, 3, and 4 would be the same, variations in housing unit type are associated with differing consumption factors. Although impacts on supply availability related to Alternative 2 would be slightly higher than Alternative 1, increases in electricity consumption associated with Alternative 2 implementation would not result in consumption of energy in excess of supply availability and would result in a less than moderate impact.

As discussed above, a total of 351~~339.3~~ trillion Btu of natural gas was consumed statewide in 202~~0~~2. A total of 2.32~~0.94~~ trillion Btu per year will be required to serve the target housing and employment growth under Alternative 2. This constitutes approximately 0.66~~28~~% of statewide usage, which although slightly greater than Alternative 1, is nominal compared to existing demand. Therefore, increases in natural gas consumption associated with Alternative 2 implementation would not result in consumption of energy in excess of supply availability and would result in a less than moderate impact.

130th/145th Station Area

Under Alternative 2, changes in land use designations focus on addressing transit-oriented developments, designating the station areas as neighborhood centers. Growth would be clustered in small mixed-use nodes near transit, resulting in denser and taller buildings with heights of up to 80 feet. The Station Area's share of the Alternative 2 housing growth ~~target~~ is approximately 2.2%.

Implementation of Alternative 2 assumes a growth potential of 2,208 housing units and 979 jobs, requiring approximately 0.05 trillion Btu of electricity and 0.043~~09~~ trillion Btu per year of natural gas. This constitutes approximately 0.016~~03~~% and 0.012~~03~~% of statewide electricity and natural gas usage, respectively, which are more than double the requirements of Alternative 1. However, impacts on supply availability in comparison with existing conditions would be nominal.

Impacts of Alternative 3: Broad

Under Alternative 3, a wider range of low-scale housing options in urban neighborhood areas would be allowed, expanding housing choices and allowing housing options near existing parks and other amenities. The target housing growth under this alternative is 100,000 dwelling units. Approximately 37% of housing growth would occur within regional centers, approximately 22% would occur within urban neighborhood areas, 15% would occur within residential urban centers, 13% would occur within hub urban centers, 2% would occur within manufacturing industrial and maritime industrial areas, and 11% would occur outside of designated villages.

Construction Energy Use

Alternative 3 would result in the greatest number of demolished units when compared to all other alternatives except for the Preferred Alternative. Alternative 3 would result in greater ~~target~~ growth compared to Alternative 1, the same as Alternative 2 and 4, and less than Alternative 5 and the Preferred Alternative. Although Alternative 3 would result in 763 greater demolished units than Alternative 5, ~~target~~ growth for Alternative 3 includes 20,000 fewer units. Therefore, energy consumption associated with construction vehicles and construction materials under Alternative 3 would likely be greater than Alternative 1, 2, and 4, and lower than Alternative 5 and the Preferred Alternative.

Operational Energy Use

Transportation Energy Use

As shown in **Exhibit 3.4-2**, growth associated with Alternative 3 would generate approximately 24.6 million VMT for cars and trucks and approximately 77,000 VMT for buses. Based on model outputs, Alternative 2 would require 0.35 trillion Btu of gasoline, 0.02 trillion Btu of diesel, 0.0002 trillion Btu of natural gas, and 0.0006 Btu of ethanol to accommodate projected VMT.

Demand for Alternative 3 would be similar to Alternative 2 for all fuel types and slightly higher than demand under Alternative 1.

As shown in **Exhibit 3.4-8,** implementation of Alternative 3 would result in a reduction in ethanol fuel consumption and an increase in gasoline, diesel, and CNG consumption compared to existing conditions. Although Alternative 3 would result in greater VMT when compared to existing conditions and Alternative 1 and lower VMT when compared to Alternative 2, increases in fuel consumption compared to Alternative 1 and 2 would be similar largely due to improvements in fuel efficiency standards and increase electrification. In addition, net fuel consumption associated with Alternative 3 growth would constitute less than 1% of statewide fuel consumption. Therefore, increases in transportation energy associated with Alternative 3 implementation would not result in consumption of energy in excess of projected supply availability.

Exhibit 3.4-8. Net Annual Transportation Fuel Usage—Alternative 3 (Trillion Btu)

	Existing	Alternative 3	Net Change in Fuel Consumption	% of Statewide (2020) Consumption
Gasoline	0.3471	0.3477	0.0006	0.0003%
Diesel	0.0141	0.0207	0.0065	0.0044%
CNG	0.0001	0.0002	0.00005	0.4644%
Ethanol	0.0006	0.0006	-0.0013	-0.0063%

Source: Kimley-Horn, 2023.

Building Energy Use

As discussed above, a total of 310~~1,779.4~~ trillion Btu of electricity was consumed statewide in 2022~~0~~. A total of 3.58 trillion Btu per year will be required to serve the target housing and employment growth under Alternative 3. This constitutes approximately 1.15~~0.20~~% of statewide usage, which is nominal compared to existing demand. Although growth ~~targets~~ between Alternatives 2, 3, and 4 would be the same, variations in housing unit type are associated with differing consumption factors. As growth for Alternative 3 would be lower than Alternative 5 and the Preferred Alternative, electricity consumption associated with Alternative 3 would be lower. Although impacts on supply availability related to Alternative 3 would be slightly higher than Alternatives 1, 2, and 4, increases in electricity consumption would not result in consumption of energy in excess of supply availability and would result in a less than moderate impact.

As discussed above, a total of 351~~39.3~~ trillion Btu of natural gas was consumed statewide in 2022~~0~~. A total of 2.38~~0.95~~ trillion Btu per year will be required to serve the target and employment growth under Alternative 3. This constitutes approximately 0.68~~28~~% of statewide usage, which is nominal compared to existing demand. Although impacts on supply availability related to Alternative 3 would be slightly higher than Alternatives 1, 2, and 4, increases in

natural gas consumption would not result in consumption of energy in excess of supply availability and would result in a less than moderate impact.

130th/145th Station Area

The station area plan would not be implemented under Alternative 3; the area would grow based on the applicable citywide place types.

Impacts of Alternative 4: Corridor

Alternative 4 would accommodate a wider range of housing options only in corridors to focus growth near transit and amenities. The target housing growth under this alternative is 100,000 dwelling units. Approximately 37% of housing growth would occur within regional centers, approximately 21% would occur within urban neighborhood-corridor areas, 15% would be within residential urban centers, 13% would be within hub urban centers, 2% would be within manufacturing industrial and maritime industrial areas, and 12% would be outside of designated villages.

Construction Energy Use

Alternative 4 would result in the demolition of a greater number of housing units than Alternative 1 and 2 and less than Alternatives 3 and 5 and the Preferred Alternative. Alternative 4 would result in greater ~~target~~ growth compared to Alternative 1, the same as Alternatives 2 and 3, and less than Alternative 5 and the Preferred Alternative. Therefore, energy consumption associated with construction vehicles and construction materials under Alternative 4 would likely be greater than Alternatives 1 and 2 and lower than Alternatives 3 and 5 and the Preferred Alternative.

Operational Energy Use

Transportation Energy Use

As discussed above, VMT data was not generated for Alternative 4. Growth ~~targets~~ under Alternative 2, 3, and 4 are the same with respect to the number of housing units and jobs. Therefore, it has been assumed that VMT for Alternative 4 would generally be between VMT of Alternative 2 and 3. Demand for Alternative 2 and Alternative 3 would be similar for all fuel types except ethanol. Ethanol demand under Alternative 3 would be slightly higher than Alternative 2. Impacts on supply availability related to Alternative 4 would be similar to Alternative 2 and Alternative 3.

Building Energy Use

As discussed above, a total of 310~~1,779.4~~ trillion Btu of electricity was consumed statewide in 2022~~0~~. A total of 3.54 trillion Btu per year will be required to serve the target housing and employment growth under Alternative 4. This constitutes approximately 1.14~~0.20~~% of statewide usage, which is nominal compared to existing demand. Demand associated with Alternative 4 would be less than Alternatives 3 and 5 and the Preferred Alternative, the same as Alternative 2, and greater than Alternative 1. Although impacts on supply availability related to Alternative 4 would be slightly higher than Alternative 1, increases in electricity consumption would not result in consumption of energy in excess of supply availability and would result in a less than moderate impact.

As discussed above, a total of 351~~39.3~~ trillion Btu of natural gas was consumed statewide in 202~~0~~2. A total of 2.34~~0.94~~ trillion Btu per year will be required to serve the target housing and employment growth under Alternative 4. This constitutes approximately 0.67~~.28~~% of statewide usage, which is nominal compared to existing demand. Demand associated with Alternative 4 would be less than Alternatives 3 and 5 and the Preferred Alternative, the same as Alternative 2, and greater than Alternative 1. Although impacts on supply availability related to Alternative 4 would be slightly higher than Alternative 1, increases in natural gas consumption would not result in consumption of energy in excess of supply availability and would result in a less than moderate impact.

130th/145th Station Area

The station area plan would not be implemented under Alternative 4; the area would grow based on the applicable citywide place types.

Impacts of Alternative 5: Combined

Alternative 5 and the Preferred Alternative anticipate~~s~~ the largest increases in supply and diversity of housing units within the City. In addition to the growth strategies of Alternatives 2, 3, and 4, Alternative 5 and the Preferred Alternative would promote a greater range of rental and ownership housing and address past underproduction of housing and rising housing costs. The ~~target~~ studied housing growth under this alternative is 120,000 dwelling units. While most housing would continue to be in regional centers (36% of housing growth) and urban centers (19% of housing growth), the combined growth in neighborhood centers and urban neighborhood–corridors would be substantial (24%).

Construction Energy Use

Alternative 5 would result in a greater number of demolished units than Alternative 1, 2, and 4 and less than Alternative 3 and the Preferred Alternative. Alternative 5 would result in the greatest ~~target~~ studied growth compared to all other alternatives and would be the same as the Preferred Alternative. Therefore, energy consumption associated with construction vehicles and

construction materials under Alternative 5 would likely be the greater~~est out of all five alternatives~~ than Alternatives 1 through 4 and less than the Preferred Alternative.

Operational Energy Use

Transportation Energy Use

As shown in **Exhibit 3.4-2**, growth associated with Alternative 5 would generate approximately 25.1 million VMT for cars and trucks and approximately 77,000 VMT for buses. Based on model outputs, Alternative 5~~2~~ would require 0.359~~6~~ trillion Btu of gasoline, 0.0212 trillion Btu of diesel, 0.00016~~2~~ trillion Btu of natural gas, and 0.0067 Btu of ethanol to accommodate projected VMT. ~~Out of all five alternatives, d~~Demand for all fuel types ~~would be the greatest~~ under Alternative 5 would be greater than Alternatives 1, 2, 3, and 4 and slightly lower than the Preferred Alternative.

As shown in **Exhibit 3.4-9,** implementation of Alternative 5 would result in a reduction in ethanol fuel consumption and an increase in gasoline, diesel, and CNG consumption compared to existing conditions. As Alternative 5 would result in greater VMT when compared to existing conditions and ~~all other a~~Alternatives 1 through 4, increases in fuel consumption would be slightly higher largely due to improvements in fuel efficiency standards, increase electrification, and increased densities resulting in reduced VMT per capita. In addition, net fuel consumption associated with Alternative 5 growth would constitute less than 1% of statewide fuel consumption. Therefore, increases in transportation energy associated with Alternative 5 implementation would not result in consumption of energy in excess of projected supply availability.

Exhibit 3.4-9. Net Annual Transportation Fuel Usage—Alternative 5~~3~~ (Trillion Btu)

	Existing	Alternative 5	Net Change in Fuel Consumption	% of Statewide (2020) Consumption
Gasoline	0.3471	0.3596	0.0125	0.0048%
Diesel	0.0141	0.0212	0.0071	0.0047%
CNG	0.0001	0.0002	0.00005	0.4734%
Ethanol	0.0006	0.0007	-0.0013	-0.0064%

Source: Kimley-Horn, 2023.

Building Energy Use

As discussed above, a total of 310~~1,779.4~~ trillion Btu of electricity was consumed statewide in 2022~~0~~. A total of 3.84 trillion Btu per year will be required to serve the target housing and employment growth under Alternative 5. This constitutes approximately 1.24~~0.22~~% of statewide usage, which is nominal compared to existing demand. Although impacts on supply availability related to Alternative 5 would be greater than Alternatives 1 through 4, increases in

electricity consumption associated with Alternative 5 implementation would not result in consumption of energy in excess of supply availability and would result in a less than moderate impact.

As discussed above, a total of 3513~~9.3~~ trillion Btu of natural gas was consumed statewide in 202~~0~~2. A total of 02.65~~,98~~ trillion Btu per year will be required to serve the target housing and employment growth under Alternative 5. This constitutes approximately 0.75~~29~~% of statewide usage, which is nominal compared to existing demand. ~~a~~Although impacts on supply availability related to Alternative 5 would be greater than Alternatives 1 through 4, increases in natural gas consumption associated with Alternative 5 implementation would not result in consumption of energy in excess of supply availability and would result in less than moderate impact.

130th/145th Station Area

Under Alternative 5, an urban centers designation on both the west and east sides of the 130th Station Area would merge with an existing commercial node to expand residential mixed use near the station. Growth would be accommodated in more mixed-use buildings, providing greater housing types in buildings with heights of up to 95 feet. The Station Area's share of the Alternative 5 housing growth ~~target~~ is approximately 2.2%.

Implementation of Alternative 5 assumes a growth potential of 2,703 housing units and 1,004 jobs, requiring approximately 0.05 trillion Btu of electricity and 0.046~~1~~ trillion Btu of natural gas per year. This constitutes approximately 0.017~~03~~% and 0.013~~03~~% of statewide electricity and natural gas usage, respectively. Energy requirements under this alternative would be slightly higher than Alternative 2 and impacts on supply availability in comparison with Alternative 2 would be nominal.

Impacts of Preferred Alternative

Note: The impacts analysis for the Preferred Alternative was added since the Draft EIS.

The Preferred Alternative anticipates an increase in supply and diversity of housing across Seattle similar to Alternative 5. It includes the strategies for encouraging housing growth in the other action alternatives plus some additional changes to existing center boundaries and changes to place type designations beyond Alternative 5. Like Alternative 5, the Preferred Alternative anticipates the largest increase in supply of housing units within the City. As with Alternative 5, the target housing growth under this alternative is 120,000 dwelling units.

Construction Energy Use

The Preferred Alternative would result in the greatest number of demolished units compared to all other alternatives. The Preferred Alternative would result in the greatest growth, along with Alternative 5, compared to all other alternatives. Therefore, energy consumption associated with construction vehicles and construction materials under the Preferred

Alternative would likely be the greatest of all alternatives due to the higher number of demolished units.

Operational Energy Use

Transportation Energy Use

As shown in **Exhibit 3.4-2**, growth associated with the Preferred Alternative would generate approximately 25.2 million VMT for cars and trucks and approximately 77,000 VMT for buses. Growth under Alternative 5 and the Preferred Alternative would be the same. The difference in the allocation of growth results in differing trip patterns and VMT. VMT under the Preferred Alternative would be approximately 0.38% greater than Alternative 5. Preferred Alternative fuel usage have been estimated by increasing Alternative 5 fuel usage by 0.38%. Based Alternative 5 model outputs, the Preferred Alternative would require 0.36 trillion Btu of gasoline, 0.0213 trillion Btu of diesel, 0.00016 trillion Btu of natural gas, and 0.00067 Btu of ethanol to accommodate projected VMT. Out of all alternatives, demand for all fuel types would be the greatest under the Preferred Alternative.

As shown in **Exhibit 3.4-10,** implementation of the Preferred Alternative would result in a reduction in ethanol fuel consumption and an increase in gasoline, diesel, and CNG consumption compared to existing conditions. As the Preferred Alternative would result in greater VMT when compared to existing conditions and all other alternatives, increases in fuel consumption would be slightly higher largely due to improvements in fuel efficiency standards, increase electrification, and increased densities resulting in reduced VMT per capita. In addition, net fuel consumption associated with the Preferred Alternative growth would constitute less than 1% of statewide fuel consumption. Therefore, increases in transportation energy associated with the Preferred Alternative implementation would not result in consumption of energy in excess of projected supply availability.

Exhibit 3.4-10. Net Annual Transportation Fuel Usage—Preferred (Trillion Btu)

	Existing	Preferred Alternative	Net Change in Fuel Consumption	% of Statewide (2020) Consumption
Gasoline	0.3471	0.3609	0.0138	0.0054%
Diesel	0.0141	0.0213	0.0071	0.0048%
CNG	0.0001	0.0002	0.00005	0.4797%
Ethanol	0.0006	0.0007	-0.0013	-0.0064%

Source: Kimley-Horn, 2024.

Building Energy Use

As discussed above, a total of 310 trillion Btu of electricity was consumed statewide in 2022. A total of 4.01 trillion Btu per year will be required to serve the target housing and employment growth under the Preferred Alternative. This constitutes approximately 1.29% of statewide

usage, which is nominal compared to existing demand. Although impacts on supply availability related to the Preferred Alternative would be greater than all other alternatives, increases in electricity consumption associated with Preferred Alternative implementation would not result in consumption of energy in excess of supply availability and would result in a less than moderate impact.

As discussed above, a total of 351 trillion Btu of natural gas was consumed statewide in 2022. A total of 2.77 trillion Btu per year will be required to serve the target housing and employment growth under the Preferred Alternative. This constitutes approximately 0.79% of statewide usage, which is nominal compared to existing demand. Although impacts on supply availability related to the Preferred Alternative would be greater than all other alternatives, increases in natural gas consumption associated with Preferred Alternative implementation would not result in consumption of energy in excess of supply availability and would result in less than moderate impact.

130th/145th Station Area

Under the Preferred Alternative, similar to Alternative 5, an urban centers designation on both the west and east sides of the 130th Station Area would merge with an existing commercial node to expand residential mixed use near the station. Growth would be accommodated in more mixed-use buildings, providing greater housing types in buildings with heights of up to 85 feet. The Station Area's share of the Preferred Alternative housing growth is approximately 1.8%.

Implementation of the Preferred Alternative assumes a growth potential of 2,152 housing units and 658 jobs, requiring approximately 0.05 trillion Btu of electricity and 0.045 trillion Btu of natural gas per year. This constitutes approximately 0.017% and 0.013% of statewide electricity and natural gas usage, respectively. Energy requirements under this alternative would be slightly lower than Alternative 2 and impacts on supply availability in comparison with Alternative 2 would be similar.

3.4.3 Mitigation Measures

Incorporated Plan Features

- Land Use and Transportation: Diversity in land uses combined with increased density within an urban area can lead to shorter trip distances and greater reliance on walking or mass transit trips, as well as the reduced need for vehicle ownership. Regardless of which alternative is chosen, implementation of the Seattle Comprehensive Plan would result in increased housing options and densities that, together with additional transit options would reduce VMT.
- Climate Element: The action alternatives would result in a new One Seattle Comprehensive Plan including a new Climate Element addressing greenhouse gas emission reductions through VMT reductions and building energy use reductions, and a climate resilience sub-

element addressing adaptation to climate change such as building retrofits and design to provide for cooling and energy demand reduction.

Regulations & Commitments

- ~~The City of Seattle Building Energy Code eliminates the use of fossil fuels like gas and electric resistance from most water heating and space heating systems in new construction and substantial alterations for commercial and multifamily uses.~~ The City of Seattle Energy Code regulates the energy-use features of new and remodeled buildings.
- Seattle's Energy Benchmarking Law (Seattle Municipal Code 22.290) requires the owners of non-residential and multifamily buildings (20,000 square feet or larger) to track and report (annually) energy performance.
- Compliance with the Seattle Building Tune-Ups Ordinance (Seattle Municipal Code 22.930) aims to optimize energy and water performance by identifying low- or no-cost actions related to building operations and maintenance, generating approximately 10-15% energy savings.
- Building Emissions Performance Standards (BEPS) ~~(currently under development as of March 2023)~~ sets ~~energy and/or~~ emissions targets for existing and future buildings over 20,000 square feet that the buildings must meet over time to improve energy efficiency and reduce climate impacts. ~~Seattle Mayor Harrell directed the Office of Sustainability and Environment to develop legislation for carbon-based performance standards for existing commercial and multifamily buildings 20,000 sq. ft or larger. Included in this was a plan to transition all city owned buildings off fossil fuels by 2035. This proposed~~ The Building Emissions Performance Standard (BEPS) complements the CBPS and builds on the City's existing Energy Benchmarking and Building Tune-Up programs. ~~includes standard greenhouse gas intensity targets (GHGITs) for 21 building activity types (e.g., office, retail, multifamily) for each compliance interval until net-zero emissions targets in 2050 (City of Seattle, 2023). The BEPS proposal sets required GHGITs through 2035 and provisional targets from 2036 – 2050 to enable owners to plan, while allowing the later targets to be revised, if needed, by future rules updates. All future development would be required to adhere to energy efficiency standards combined with increased efficiency through performance requirements fostered by the Climate Action Plan and all-electric space and water heating required by the Washington Energy Code.~~

Other Potential Mitigation Measures

Strategies that could be further integrated into plans and programs include encouraging:

- Installation of solar (photovoltaic) and other local generating technologies would reduce demand on energy supplied from public generating and distribution facilities.
- Implementation of sustainable requirements including the construction and operation of LEED-compliant (or similar ranking system) buildings which would reduce the increase required in power systems.

- The use of passive systems and modern power saving units would reduce the use of power in building heating and cooling.
- Use of alternative forms of energy could be included in larger developments where installation is cost effective.
- Implementation of conservation efforts and renewable energy sources to conserve electricity in new developments, including energy efficient equipment (i.e., light bulbs, appliances, and heating and air conditioning), and could reduce energy consumption.

3.4.4 Significant Unavoidable Adverse Impacts

No significant unavoidable adverse impacts on energy are anticipated. The development capacities proposed under all alternatives would increase overall energy consumption. This is mitigated by applying energy codes to new development and VMT measures for building and transportation energy usage. Adherence to energy efficiency measures would ensure that future development would not result in the consumption of energy resources in excess of projected supply availability.

Average annual transportation fuel consumption would increase under all alternatives when compared to existing conditions by less than 1% due to the increase in total VMT associated with projected growth. However, with increased average vehicle fuel efficiency and providing the infrastructure and opportunity for people living and working in the City of Seattle to access alternative transportation modes, action alternatives would not result in the consumption of energy resources in excess of projected supply and would not conflict with energy policies adopted by the City of Seattle.

Since average annual energy use per capita is expected to decrease, the action alternatives would not conflict with energy policies adopted by the City of Seattle.

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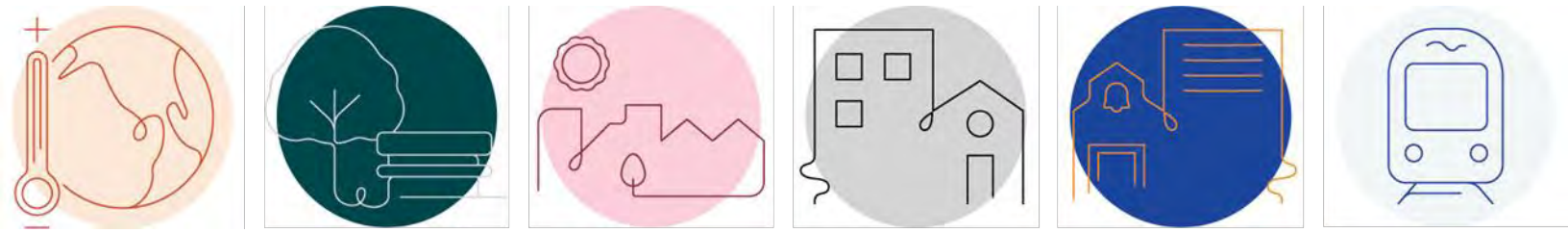
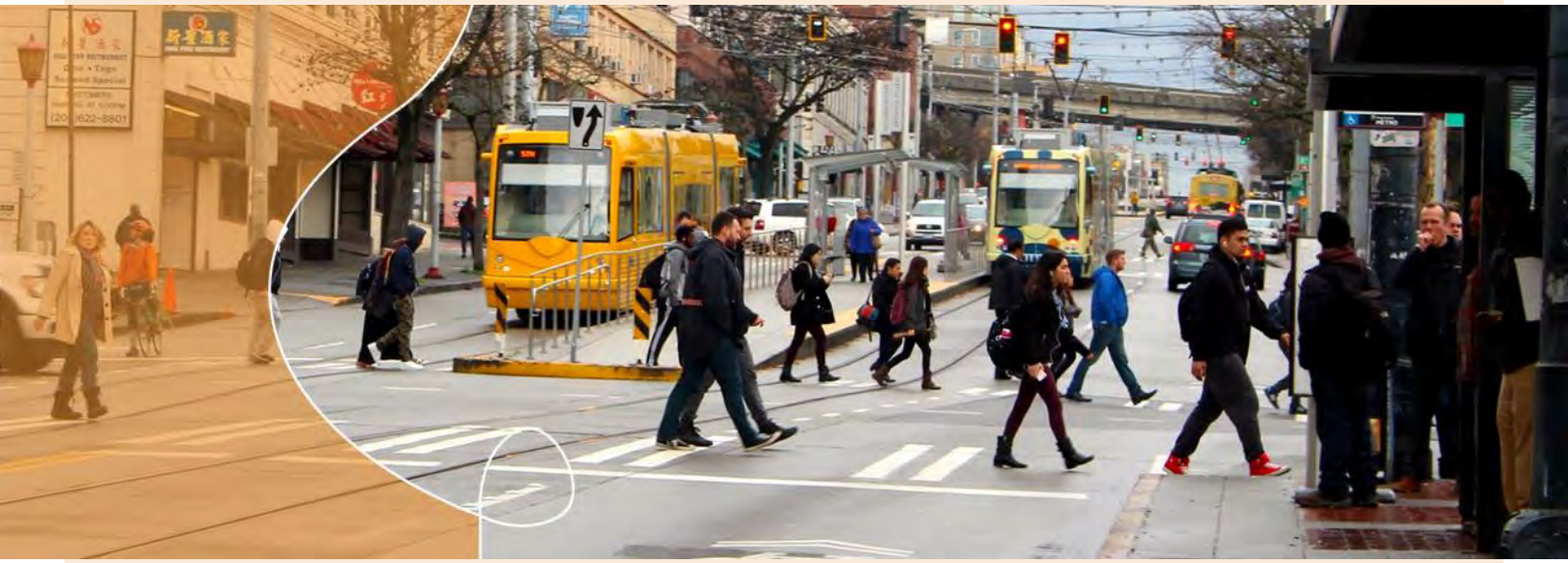
3.5 Noise





Source: City of Seattle, 2023.

This section assesses the potential noise/vibration impacts associated with implementing the alternatives considered in this EIS. The following includes acoustical terminology and background information, a presentation of applicable regulatory standards, assessment of acoustical impacts related to implementing the alternatives, and identification of potentially feasible noise mitigation measures where appropriate.

Thresholds of significance utilized in this impact analysis include:

- The alternative would cause future traffic noise levels of 10 dBA or more above existing noise levels.
- Noise-sensitive receivers are concentrated near noise-generating (non-residential) activities or major roadways.

Data & Methods

The project team used a range of data sources for this assessment of ambient, construction, and traffic noise listed below.

- Highway Construction Noise Handbook (FHWA 2006)
- Highway Traffic Noise: Analysis and Abatement Guidance (FHWA 2011)
- City of Seattle Municipal Code (SMC Chapter 25)
- State of Washington Administrative Code (Chapter 173-60 WAC)
- Port of Seattle Aircraft Noise Monitoring System (2022)

3.5.1 Affected Environment

Environmental Noise & Vibration Fundamentals

Sound & Fundamental Noise

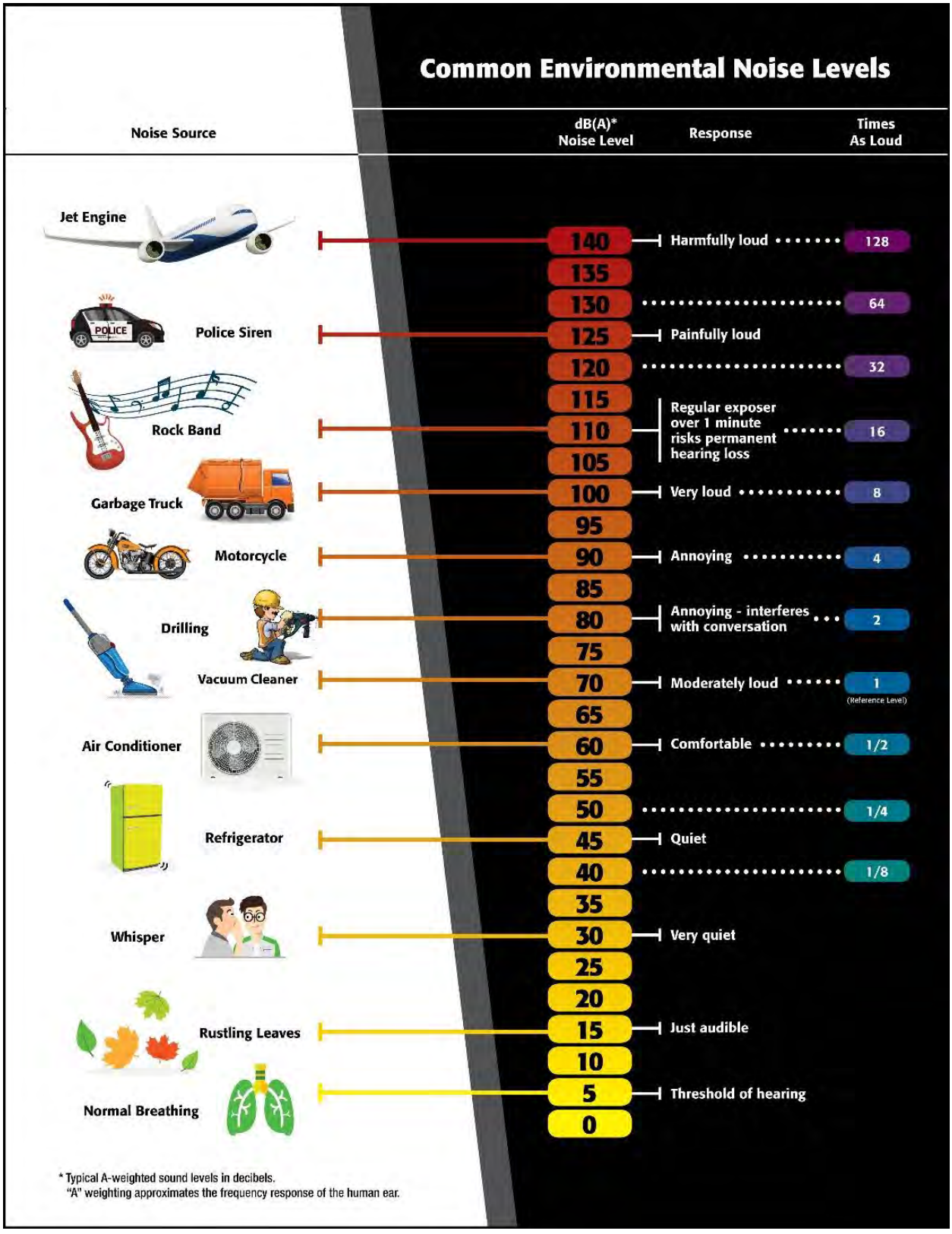
Acoustics is the science of sound. Sound can be described as the mechanical energy of a vibrating object transmitted by pressure waves through a medium (e.g., air) to a human (or animal) ear. If the pressure variations occur frequently enough (at least 20 times per second), they can be heard and are called sound. The number of pressure variations per second is called the frequency of sound and is expressed as cycles per second, or hertz (Hz).

Noise is defined as loud, unexpected, or unwanted sound. The fundamental acoustics model consists of a noise source, a receptor (or "receiver"), and the propagation path between the two. The loudness of the noise source, obstructions, or atmospheric factors affecting the propagation path determine the perceived sound level and noise characteristics at the receptor. Acoustics deal primarily with the propagation and control of sound. A typical noise environment consists of a base of steady background noise that is the sum of many distant and indistinguishable

noise sources. The sound from individual local sources is superimposed on this background noise. These sources can vary from an occasional aircraft or train passing by to continuous noise from traffic on a major highway. Perceptions of sound and noise are highly subjective from person to person. **Exhibit 3.5-1** depicts typical noise levels.

Measuring sound directly in terms of pressure would require a large range of numbers. To avoid this, the decibel (dB) scale was devised. The dB scale uses the hearing threshold of 20 micropascals (μPa) as a point of reference, defined as 0 dB. Other sound pressures are then compared to this reference pressure, and the logarithm is taken to keep the numbers in a practical range. The dB scale allows a million-fold increase in pressure to be expressed as 120 dB, and changes in levels correspond closely to human perception of relative loudness.

Exhibit 3.5-1. Typical Noise Levels



Source: Kimley-Horn and Associates, Inc., 2020.

Noise Descriptors

The dB scale alone does not adequately characterize how humans perceive noise. The dominant frequencies of a sound have a substantial effect on the human response to that sound. Several rating scales have been developed to analyze the adverse effect of community noise on people. Because environmental noise fluctuates over time, these scales consider that the effect of noise on people is largely dependent on the total acoustical energy content of the noise, as well as the time of day when the noise occurs. Most commonly, environmental sounds are described in terms of the equivalent noise level (L_{eq}) that has the same acoustical energy as the summation of all the time-varying events. While L_{eq} represents the continuous sound pressure level over a given period, the day-night noise level (L_{dn}) and Community Equivalent Noise Level (CNEL) are measures of energy average during a 24-hour period, with dB weighted sound levels from 7:00 PM to 7:00 AM. Each is applicable to this analysis and defined in **Exhibit 3.5-2**.

Exhibit 3.5-2. Definitions of Acoustical Terms

Term	Definitions
Decibel (dB)	A unit describing the amplitude of sound, equal to 20 times the logarithm to the base 10 of the ratio of the pressure of the sound measured to the reference pressure. The reference pressure for air is 20.
Sound Pressure Level	Sound pressure is the sound force per unit area, usually expressed in µPa (or 20 micronewtons per square meter), where 1 pascal is the pressure resulting from a force of 1 newton exerted over an area of 1 square meter. The sound pressure level is expressed in dB as 20 times the logarithm to the base 10 of the ratio between the pressures exerted by the sound to a reference sound pressure (e.g., 20 µPa). Sound pressure level is the quantity that is directly measured by a sound level meter.
Frequency (Hz)	The number of complete pressure fluctuations per second above and below atmospheric pressure. Normal human hearing is between 20 Hz and 20,000 Hz. Infrasonic sound are below 20 Hz and ultrasonic sounds are above 20,000 Hz.
A-Weighted Sound Level (dBA)	The sound pressure level in dB as measured on a sound level meter using the A-weighting filter network. The A-weighting filter de-emphasizes the very low and very high frequency components of the sound in a manner similar to the frequency response of the human ear and correlates well with subjective reactions to noise.
Equivalent Noise Level (L_{eq})	The average acoustic energy content of noise for a stated period of time. Thus, the L_{eq} of a time-varying noise and that of a steady noise are the same if they deliver the same acoustic energy to the ear during exposure. For evaluating community impacts, this rating scale does not vary, regardless of whether the noise occurs during the day or the night.
Maximum Noise Level (L_{max}) Minimum Noise Level (L_{min})	The maximum and minimum dBA during the measurement period.
Exceeded Noise Levels (L_{01}, L_{10}, L_{50}, L_{90})	The dBA values that are exceeded 1%, 10%, 50%, and 90% of the time during the measurement period.
Day-Night Noise Level (L_{dn})	A 24-hour average L_{eq} with a 10 dBA weighting added to noise during the hours of 10:00 PM to 7:00 AM to account for noise sensitivity at nighttime. The

Term	Definitions
	logarithmic effect of these additions is that a 60 dBA 24-hour L_{eq} would result in a measurement of 66.4 dBA L_{dn}.
Community Noise Equivalent Level (CNEL)	A 24-hour average L_{eq} with a 5 dBA weighting during the hours of 7:00 AM to 10:00 AM and a 10 dBA weighting added to noise during the hours of 10:00 PM to 7:00 AM to account for noise sensitivity in the evening and nighttime, respectively. The logarithmic effect of these additions is that a 60 dBA 24-hour L_{eq} would result in a measurement of 66.7 dBA CNEL.
Ambient Noise Level	The composite of noise from all sources near and far. The normal or existing level of environmental noise at a given location.
Intrusive	That noise which intrudes over and above the existing ambient noise at a given location. The relative intrusiveness of a sound depends on its amplitude, duration, frequency, and time of occurrence and tonal or informational content as well as the prevailing ambient noise level.

Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, September 2018.

Because sound levels can vary markedly over a short period of time, a method for describing either the sound's average character (L_{eq}) or the variations' statistical behavior (L_{XX}) must be utilized. The scientific instrument used to measure noise is the sound level meter. Sound level meters can accurately measure environmental noise levels to within about plus or minus 1 dBA. Various computer models are used to predict environmental noise levels from sources, such as roadways and airports. The predicted models' accuracy depends on various factors, such as the distance between the noise receptor and the noise source, the character of the ground surface (e.g., hard or soft), and the presence or absence of structures (e.g., walls or buildings) or topography, and how well model inputs reflect these conditions.

A-Weighted Decibels

The perceived loudness of sounds is dependent on many factors, including sound pressure level and frequency content. However, within the usual range of environmental noise levels, perception of loudness is relatively predictable and can be approximated by dBA values. There is a strong correlation between dBA and the way the human ear perceives sound. For this reason, the dBA has become the standard tool of environmental noise assessment. All noise levels reported in this document are in terms of dBA, but are expressed as dB, unless otherwise noted.

Addition of Decibels

The dB scale is logarithmic, not linear, and therefore sound levels cannot be added or subtracted through ordinary arithmetic. Two sound levels 10 dB apart differ in acoustic energy by a factor of 10 (Caltrans, 2013). When the standard logarithmic dB is A-weighted, an increase of 10 dBA is generally perceived as a doubling in loudness. For example, a 70-dBA sound is half as loud as an 80-dBA sound and twice as loud as a 60-dBA sound. When two identical sources are each producing sound of the same loudness, the resulting sound level at a given distance

would be 3 dBA higher than one source under the same conditions. Under the dB scale, three sources of equal loudness together would produce an increase of 5 dBA.

Sound Propagation & Attenuation

Sound spreads (propagates) uniformly outward in a spherical pattern, and the sound level decreases (attenuates) at a rate of approximately 6 dB for each doubling of distance from a stationary or point source. Sound from a line source, such as a highway, propagates outward in a cylindrical pattern. Sound levels attenuate at a rate of approximately 3 dB for each doubling of distance from a line source, such as a roadway, depending on ground surface characteristics. No excess attenuation is assumed for hard surfaces like a parking lot or a body of water. Soft surfaces, such as soft dirt or grass, can absorb sound, so an excess ground-attenuation value of 1.5 dB per doubling of distance is normally assumed. For line sources, an overall attenuation rate of 3 dB per doubling of distance is assumed in this report.

Noise levels may also be reduced by intervening structures; generally, a single row of buildings between the noise receptor and the noise source reduces the noise level by about 5 dBA, while a solid wall or berm can reduce noise levels by 5 to 15 dBA (FHWA, 2006). The way older homes were constructed generally provides a reduction of exterior-to-interior noise levels of about 20 to 25 dBA with closed windows. The exterior-to-interior reduction of newer residential units is generally 30 dBA or more.

Human Response to Noise

The human response to environmental noise is subjective and varies considerably from individual to individual. Noise in the community has often been cited as a health problem, not in terms of actual physiological damage, such as hearing impairment, but in terms of inhibiting general well-being and contributing to undue stress and annoyance. The health effects of noise in the community arise from interference with human activities, including sleep, speech, recreation, and tasks that demand concentration or coordination. Hearing loss can occur at the highest noise intensity levels.

Noise environments and consequences of human activities are usually well represented by median noise levels during the day or night or over a 24-hour period. Environmental noise levels are generally considered low when the CNEL is below 60 dBA, moderate in the 60 to 70 dBA range, and high above 70 dBA (Cowan, 1994, and Harris, 1979). Examples of low daytime levels are isolated, natural settings with noise levels as low as 20 dBA and quiet, suburban, residential streets with noise levels around 40 dBA. Noise levels above 45 dBA at night can disrupt sleep. Examples of moderate-level noise environments are urban residential or semi-commercial areas (typically 55 to 60 dBA) and commercial locations (typically 60 dBA). People may consider louder environments adverse, but most will accept the higher levels associated with noisier urban residential or residential-commercial areas (60 to 75 dBA) or dense urban or industrial areas (65 to 80 dBA). Regarding increases in dBA, the following relationships should be noted (Caltrans, 2013 and 2017):

- Except in carefully controlled laboratory experiments, a 1-dBA change cannot be perceived by humans.
- Outside of the laboratory, a 3-dBA change is considered a just-perceivable difference.
- A minimum 5-dBA change is required before any noticeable change in community response would be expected. A 5-dBA increase is typically considered substantial.
- A 10-dBA change is subjectively heard as an approximate doubling in loudness and would almost certainly cause an adverse change in community response.

Effects of Noise on People

Hearing Loss

While physical damage to the ear from an intense noise impulse is rare, a degradation of auditory acuity can occur even within a community noise environment. Hearing loss occurs mainly due to chronic exposure to excessive noise but may be due to a single event such as an explosion. Natural hearing loss associated with aging may also be accelerated from chronic exposure to loud noise. The Occupational Safety and Health Administration has a noise exposure standard that is set at the noise threshold where hearing loss may occur from long-term exposures. The maximum allowable level is 90 dBA averaged over 8 hours. If the noise is above 90 dBA, the allowable exposure time is correspondingly shorter (U.S. Department of Labor, 1974).

Annoyance

Attitude surveys are used for measuring the annoyance felt in a community for noises intruding into homes or affecting outdoor activity areas. In these surveys, it was determined that causes for annoyance include interference with speech, radio and television, house vibrations, and interference with sleep and rest. The L_{dn} as a measure of noise has been found to provide a valid correlation of noise level and the percentage of people annoyed. People have been asked to judge the annoyance caused by aircraft noise and ground transportation noise. There continues to be disagreement about the relative annoyance of these different sources. A noise level of about 55 dBA L_{dn} is the threshold at which a substantial percentage of people begin to report annoyance (FICON, 1992).

Ground Borne Vibration

Sources of ground borne vibrations include natural phenomena (earthquakes, volcanic eruptions, sea waves, landslides, etc.) or man-made causes (explosions, machinery, traffic, trains, construction equipment, etc.). Vibration sources may be continuous (e.g., factory machinery) or transient (e.g., explosions). Ground vibration consists of rapidly fluctuating motions or waves with an average motion of zero. Several different methods are typically used to quantify vibration amplitude. One is the peak particle velocity (PPV); another is the root mean square (RMS) velocity. The PPV is defined as the maximum instantaneous positive or

negative peak of the vibration wave and is expressed in terms of inches-per- second (in/sec). The RMS velocity is defined as the average of the squared amplitude of the signal and is expressed in terms of velocity decibels (VdB). The PPV and RMS vibration velocity amplitudes are used to evaluate human response to vibration.

Exhibit 3.5-3 displays the reactions of people and the effects on buildings produced by continuous vibration levels. The annoyance levels shown in the table should be interpreted with care since vibration may be found to be annoying at much lower levels than those listed, depending on the level of activity or the individual's sensitivity. To sensitive individuals, vibrations approaching the threshold of perception can be annoying. Low-level vibrations frequently cause irritating secondary vibration, such as a slight rattling of windows, doors, or stacked dishes. The rattling sound can give rise to exaggerated vibration complaints, even though there is very little risk of actual structural damage. In high noise environments, which are more prevalent where ground borne vibration approaches perceptible levels, this rattling phenomenon may also be produced by loud airborne environmental noise causing induced vibration in exterior doors and windows.

Ground vibration can be a concern in instances where buildings shake, and substantial rumblings occur. However, it is unusual for vibration from typical urban sources such as buses and heavy trucks to be perceptible. Common sources for ground borne vibration are planes, trains, and construction activities such as earthmoving which requires the use of heavy-duty earth moving equipment. For the purposes of this analysis, a PPV descriptor with units of inches per second (in/sec) is used to evaluate construction-generated vibration for building damage and human complaints.

Exhibit 3.5-3. Human Reaction and Damage to Buildings for Continuous or Frequent Intermittent Vibrations

Maximum PPV (in/sec)	Vibration Annoyance Potential Criteria	Vibration Damage Potential Threshold Criteria	FTA Vibration Damage Criteria
0.008	—	Extremely fragile historic buildings, ruins, ancient monuments	—
0.01	Barely Perceptible	—	—
0.04	Distinctly Perceptible	—	—
0.1	Strongly Perceptible	Fragile buildings	—
0.12	—	—	Buildings extremely susceptible to vibration damage
0.2	—	—	Non-engineered timber and masonry buildings
0.25	—	Historic and some old buildings	--

Maximum PPV (in/sec)	Vibration Annoyance Potential Criteria	Vibration Damage Potential Threshold Criteria	FTA Vibration Damage Criteria
0.3	—	Older residential structures	Engineered concrete and masonry (no plaster)
0.4	Severe	—	—
0.5	—	New residential structures, Modern industrial/commercial buildings	Reinforced-concrete, steel or timber (no plaster)

PPV = peak particle velocity; in/sec = inches per second; FTA = Federal Transit Administration
Source: California Department of Transportation, Transportation and Construction Vibration Guidance Manual, 2020 and Federal Transit administration, Transit Noise and Vibration Assessment Manual, 2018.

Current Policy & Regulatory Framework

Federal Guidelines

The U.S. Department of Housing and Urban Development (HUD) has established federal noise abatement and control standards (24 CFR Part 51, Subpart B) for new construction. These standards are widely used to assess the significance of noise impacts in residential communities. According to HUD standards, sites where community noise exposure exceeds a day-night average sound level (L_{dn}) of 65 dB (typically expressed as dBA for averages) are classified as noise-impacted, and interior noise levels within residences—typically 20 dB below exterior levels—should not exceed 45dB. Residential construction in noise-impacted areas require additional noise mitigation features for interior noise levels to meet the 45 dB standard.

In urban areas, noise from vehicles traveling on roads is a major source of noise, and changes in travel patterns and land use have the potential to affect traffic noise. Transportation facilities that receive federal funding (federal-aid projects) are subject to federal noise guidelines from the Federal Highway Administration (FHWA). FHWA also requires state departments of transportation such as the WSDOT to develop noise policies that will apply to projects within that state. WSDOT's 2020 Traffic Noise Policy and Procedures (WSDOT 2020) are consistent with the requirements of FHWA Code Federal Regulations 772 for roadway related traffic noise and are approved by FHWA for federal-aid projects in Washington.

FHWA guidelines require analysis of expected noise impacts and consideration of noise abatement by land use or Activity Category. FHWA applies different noise abatement criteria (NAC) to each Activity Category based on either exterior or interior noise levels. NAC of 67 dBA Activity Category B, which includes single- and multi-family residences, and Activity Category C, which includes places of worship, schools, recreation areas and other similar land uses. **Exhibit 3.5-4** describes WSDOT's NAC by land use category. Activity Category E includes including, hotels, motels, offices, restaurants, bars, or other developed lands with a NAC of 72 dBA. FHWA determines whether a noise impact is expected to occur when predicted future traffic noise

levels approach or exceed the established FHWA a particular Activity Category. The WSDOT definition of approach in this instance is within 1 dBA on the FWHA NAC, or 66 dBA for Activity Categories B and C or 71 dBA for Category E.

Exhibit 3.5-4. Noise Abatement Criteria by Land Use Category

Activity Category	$L_{eq(h)}$*dBA	Description
A	57 (exterior)	Lands on which serenity and quiet are of extraordinary significance and serve an important public need and where the preservation of those qualities is essential if the area is to continue to serve its intended purpose.
B	67 (exterior)	Residential (single and multi-family units)
C	67 (exterior)	Active sport areas, amphitheaters, auditoriums, campgrounds, cemeteries, day care centers, hospitals, libraries, medical facilities, parks, picnic areas, places of worship, playgrounds, public meeting rooms, public or nonprofit institutional structures, radio studios, recording studios, recreation areas, Section 4(f) sites, schools, television studios, trails, and trail crossings
D	52 (interior)	Auditoriums, day care centers, hospitals, libraries, medical facilities, places of worship, public meeting rooms, public or nonprofit institutional structures, radio studios, recording studios, schools, and television studios.
E	72 (exterior)	Hotels, motels, offices, restaurants/bars, and other developed lands, properties or activities not included in A-D or F. Includes undeveloped land permitted for these activities.
F	—	Agriculture, airports, bus yards, emergency services, industrial, logging, maintenance facilities, manufacturing, mining, rail yards, retail facilities, shipyards, utilities (water resources, water treatment, electrical), and warehousing
G	—	Undeveloped lands that are not permitted

Source: WSDOT, 2020.

State Guidelines

Washington State Noise Control Act of 1974

In 1974, the Washington State legislature authorized the establishment of regulations for the abatement and control of noise pollution considering social and economic impacts (Revised Code of Washington 70A.20). Regulations in Washington Administrative Code (WAC) 173-06-040 established maximum permissible noise levels for specific areas or environments called Environmental Designation for Noise Abatement (EDNA), which vary based on the land use of the noise source and the receiving property. Maximum permissible noise levels are measured in decibels generated by the source or project at the property line of adjacent land uses, rather than the combined project and background noise. Maximum Permissible Environmental Noise Levels apply to a variety of activities and facilities including residences, hospitals, commercial services, storage facilities, warehouses and distribution facilities, and industrial property. However, electrical substations, certain industrial installations, mobile noise sources, vehicles traveling in

the public right of way, and warning devices (i.e., bells) are exempt. The state provisions have been adopted by most cities around the state, including the City of Seattle (SMC 25.08).

City Guidelines

Seattle Municipal Code 25.08 Noise Control

Operational Noise Standards

Chapter 25.08 of the Seattle Municipal Code (SMC) establishes exterior sound level limits for specified land use zones or "districts," which vary depending on the district of sound source and the district of the receiving property. The exterior sound limits based on noise source and receiving property in the City of Seattle Noise control ordinance are summarized in **Exhibit 3.5-5**.

Exhibit 3.5-5. Maximum Permissible Noise Level

	EDNA Receiver of Noise (Maximum Allowable Sound Level in dBA L_{eq})		
EDNA Source of Noise	Residential	Commercial	Industrial
Class A Residential	55	57	60
Class B Commercial	57	60	65
Class C Industrial	60	65	70

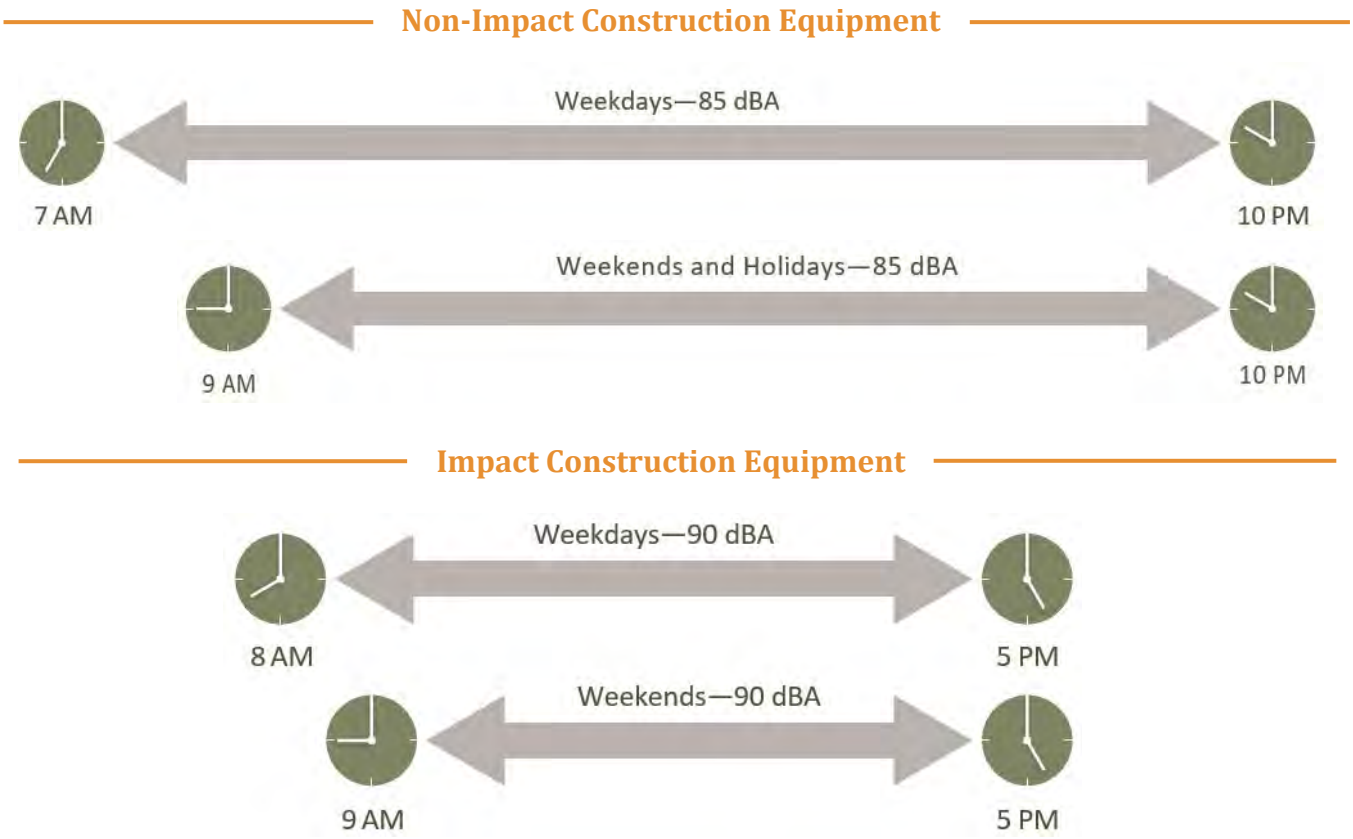
Source: City of Seattle Noise Control Ordinance SMC Chapter 25.08, 2023.

Between the hours of 10 PM and 7 AM on weekdays and 10 PM and 9 AM during weekends, the maximum limits for receivers within residential zones are to be reduced by 10 dBA. For noise of short duration, these limits can be exceeded by a maximum of 5 dBA for 15 minutes/hour, 10 dBA for 5 minutes/hour, or 15 dBA for 1.5 minutes/hour.

Construction Noise Standards

The City's Noise Control code allows the exterior sound level limits to be exceeded by certain types of construction equipment operating in most commercial districts between 7 AM and 10 PM on weekdays and between 9 AM and 10 PM on weekends and legal holidays (SMC 25.08.425; see **Exhibit 3.5-6**). The types of equipment that would usually exceed the exterior sound level limit of 60 dBA are tractors, loaders, excavators, and cranes. This equipment may exceed the applicable standard by up to 25 dBA (an 85 dBA standard) when measured at a reference distance of 50 feet. Use of impact equipment—such as a pile driver—is restricted to between 8 AM and 5 PM on weekdays and between 9 AM and 5 PM on weekends and holidays. It is also limited to a continuous noise level of 90 dBA and a maximum noise level of 99 dBA L_{max} when measured at a reference distance of 50 feet.

Exhibit 3.5-6. Construction Noise Time Limits



Source: City of Seattle Noise Control Ordinance SMC Chapter 25.08, 2023.

Current Conditions

Citywide

Traffic Noise Sources

Traffic noise exposure is comprised of several factors: the volume of vehicles per day, the speed of those vehicles, the number of those vehicles that are medium and heavy trucks, the distribution of those vehicles during daytime and nighttime hours, and the proximity of noise-sensitive receivers to the roadway. Existing traffic noise exposure is expected to be as low as 50 dB L_{dn} in the most isolated areas of the City, while receivers adjacent to interstate highways are likely to experience levels as high as 75 dB L_{dn} (U.S. Department of Transportation 2022). Traffic noise assessment in this analysis is also inclusive of bus transit, as buses are an assumed percentage of overall roadway volumes used in the calculation of roadside noise levels.

Exhibit 3.5-7 presents the distance to various noise contours for representative roadways within each subarea in Seattle. The modeled roadway segments were selected to provide an

estimate of traffic noise impacts from implementation of the alternatives and compare to the measured ambient noise levels provided in **Exhibit 3.5-7**. The values in **Exhibit 3.5-7** do not take into consideration the presence of existing sound barriers, topographical conditions or roadway elevation, all of which can vary by location. The 65 L_{dn} contour is important because it represents the exterior noise level which can be reduced to 45 dBA L_{dn} using standard construction techniques. An interior noise level of 45 L_{dn} is the commonly accepted maximum recommended interior noise level for residential uses (EPA, 2016).

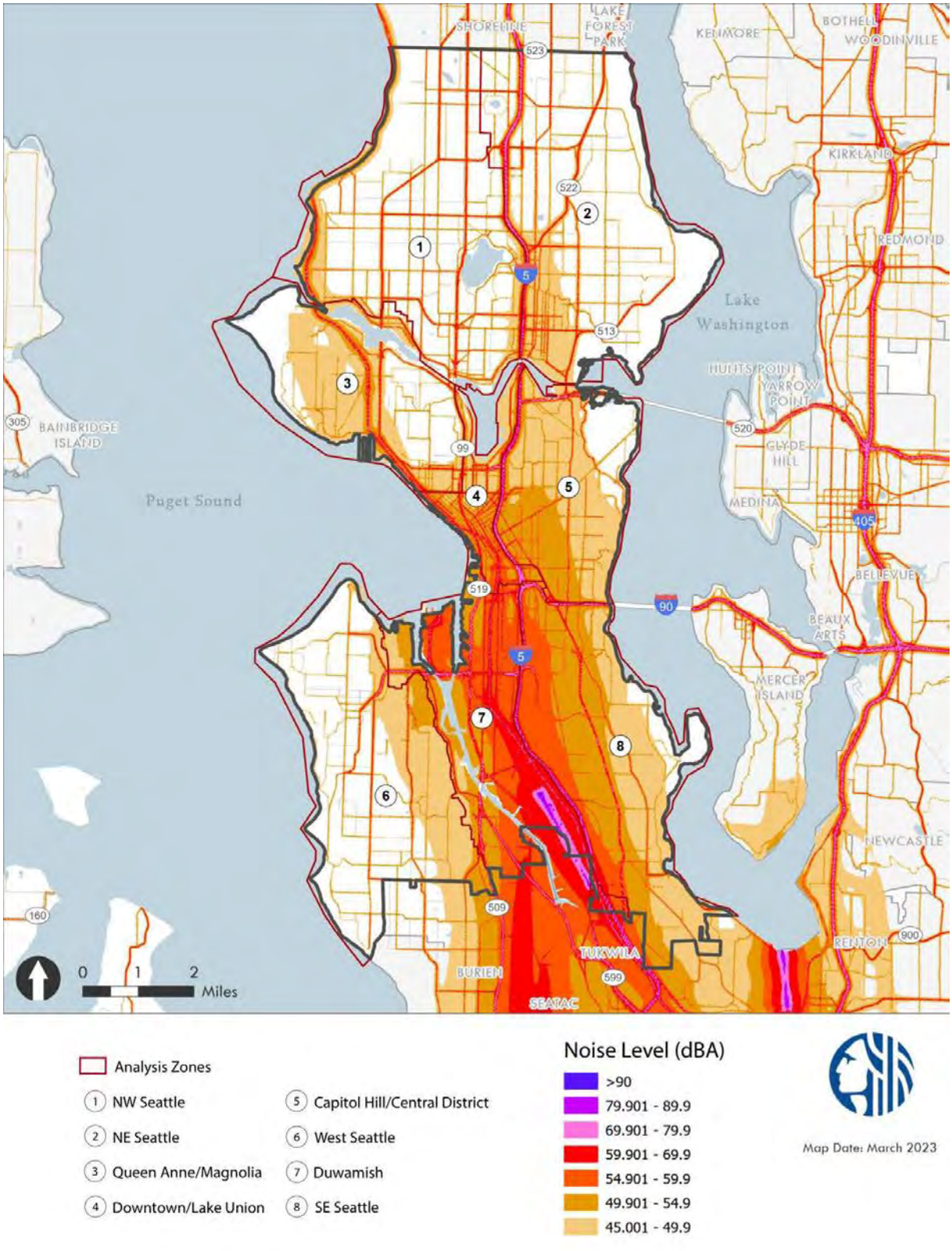
Exhibit 3.5-7. Existing Roadway Noise Levels

Roadway	Roadway Segment	Ldn at 150' from Roadway Center	Distance (feet) from Roadway Center to Noise Contours		
			65 dBA Ldn	60 dBA Ldn	55 dBA Ldn
Martin Luther King Jr Way S	Between S Jackson St and S Massachusetts St	58.4	33	105	332
	Between S Orcas St and S Graham St	59.7	—	139	440
Harbor Ave SW/Alki Ave SW	Between SW Admiral Way and California Way SW	57.5	—	83	264
Beacon Ave S	Between S Spokane St and S Columbian Way	54.8	—	46	144
34th Ave W	Between W Barrett St and W McGraw St	54.3	—	40	127
Roosevelt Way NE	Between NE Northgate Way and 80th St	56.7	—	70	220
Roosevelt Way NE	Between 5th Ave NE and 10th Ave NE	60.9	59	186	588
15th Ave NE	Between NE 135th St and NE 145th St	58.9	—	116	367

Source: Kimley-Horn, 2023.

According to the U.S. Department of Transportation National Transportation Noise Map, traffic noise levels along major highways and freeways in the City (e.g., I-5, I-405, I-90, and Highway 99) range from approximately 50 dBA L_{eq} to 75 dBA L_{eq} (U.S. Department of Transportation 2022). The National Transportation Noise Map is provided in **Exhibit 3.5-8**.

Exhibit 3.5-8. National Transportation Noise Map



Source: U.S. Department of Transportation, 2022.

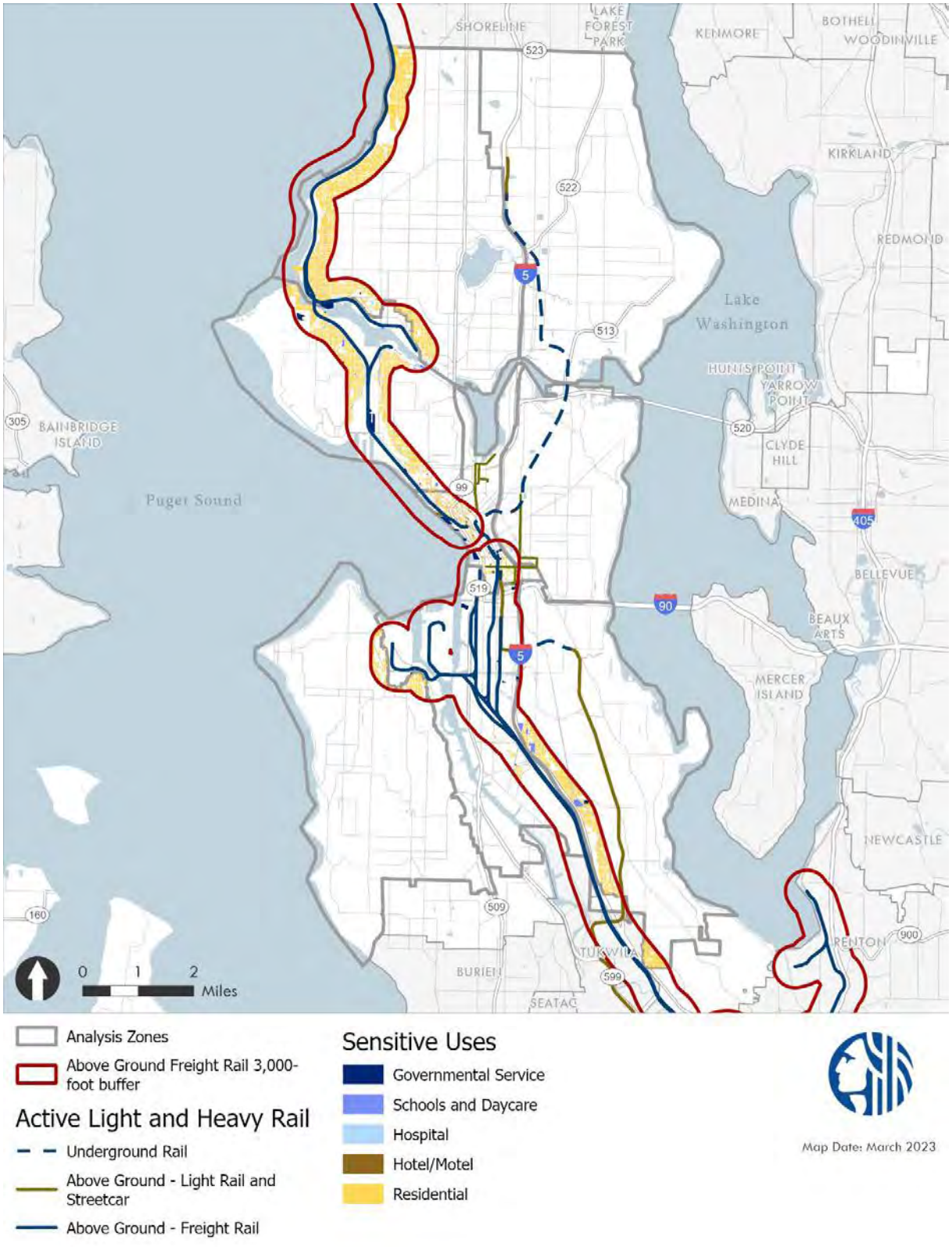
Rail Noise Sources

Seattle is also affected by noise from freight and passenger rail operations. While rail operations generate substantial noise levels in the immediate vicinity of railways, train operations are intermittent and area railways are widely dispersed. Sound Transit's light rail system operates frequently but thanks to electrification, lower speeds, and lighter loads, this results in overall lower noise levels than heavy rail systems. The contribution of rail noise to Seattle's ambient noise environment is relatively minor compared to other sources such as roadway traffic. However, areas near freight rail yards often experience higher noise levels due to the maintenance of rail vehicles, assembly of trains, and idling engines. Train operations can also be a source of significant ground-borne vibration near railroad tracks and yards. Vibration-sensitive receivers located within 100 feet of rail operations may be adversely affected by vibration exposure during train events (FTA, 2018). **Exhibit 3.5-9** shows active rail lines in the City of Seattle.

Aircraft Noise Sources

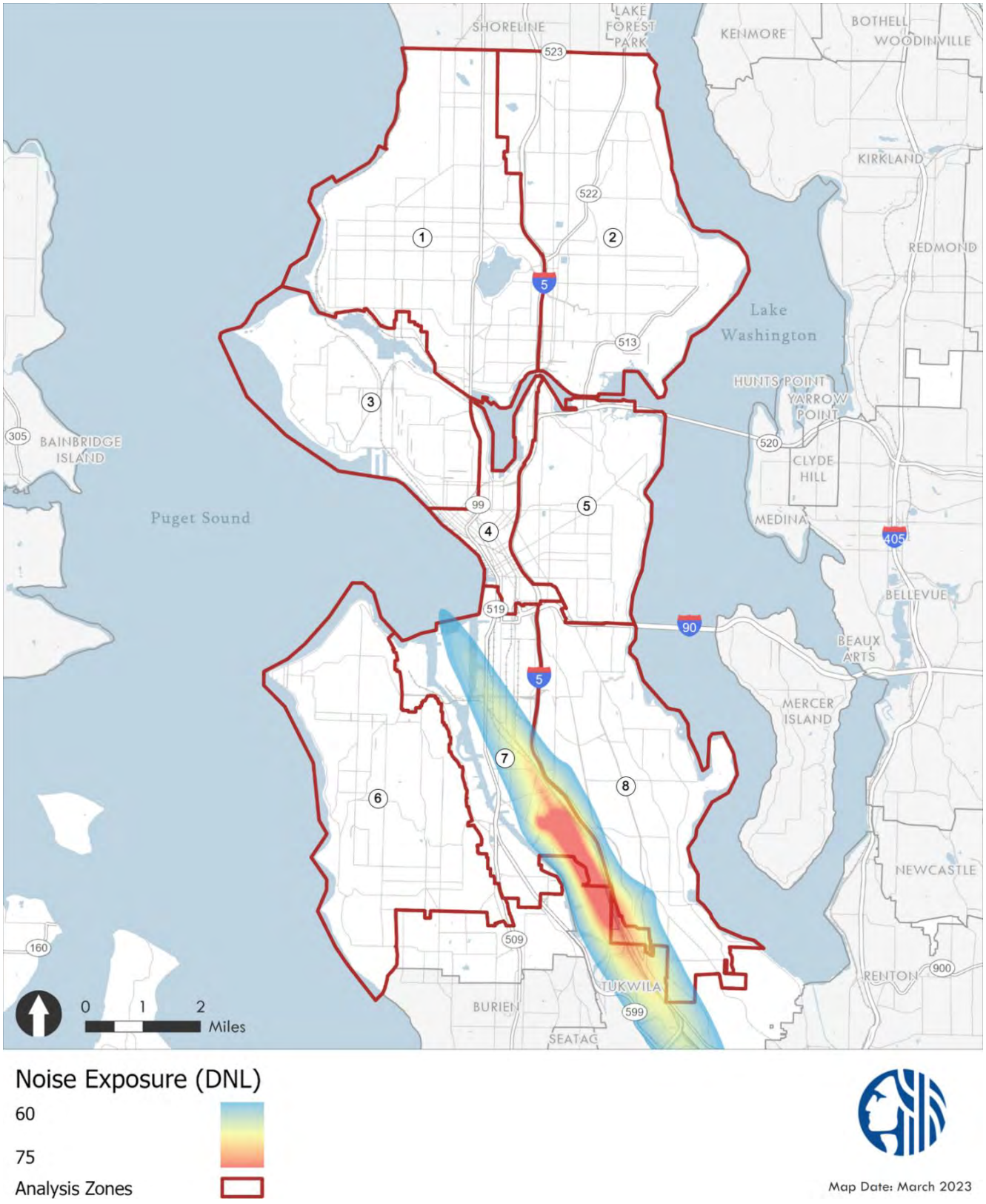
King County International Airport (also known as Boeing Field) is located in the southern portion of the City and generates approximately 500 aircraft operations a day. Aircraft originating from other airports such as Seattle-Tacoma International Airport frequently fly over Seattle. All these operations contribute to the overall ambient noise environment within the City. Similar to rail noise, the proximity of the receiver to the airport and aircraft flight path influences the noise level exposure. Other contributing factors include the type of aircraft operated, altitude of the aircraft, and atmospheric conditions. Atmospheric conditions may contribute to the direction of aircraft operations (flow) and affect aircraft noise propagation. The 60-75 DNL noise contours for Boeing Field are shown in **Exhibit 3.5-10**. As shown in **Exhibit 3.5-10**, the highest noise levels (up to 75 DNL) are concentrated near the central portion of the Boeing Field Airport where the runway is located. Lower noise levels (approximately 60-70 DNL) extend further to the northwest and southeast of the airport and follow the general flight path for airplanes departing/arriving at Boeing Field.

Exhibit 3.5-9. Active Rail Lines in Seattle



Source: Kimley Horn, 2023.

Exhibit 3.5-10. Boeing Field Noise Contours



Source: Kimley Horn, 2023.

Construction Noise Sources

Construction activities related to new development and transportation improvements can create high noise levels of relatively short duration. Noise generated by construction equipment varies greatly depending on factors such as the operation performed, equipment type, model, age, and condition. Noise from heavy equipment diesel engine operations can dominate the noise environment surrounding construction sites. Other stationary equipment sources such as generators, pumps, and compressors can also contribute significantly. Operation of impact equipment such as pile drivers generally produces the highest noise levels and may also produce significant vibration in the vicinity. Maximum noise exposure from typical construction equipment operations is approximately 75–100 dB (L_{max} at 50 feet), the highest noise production from heavy demolition and pile driving operations. Please refer to **Exhibit 3.5-11** for typical construction noise levels.

Exhibit 3.5-11. Typical Noise Levels from Construction/Demolition Equipment

Construction Equipment	Typical Noise Level at 50 ft from Source
Air Compressor	80 dBA
Backhoe	80 dBA
Compactor	82 dBA
Concrete Mixer (Truck)	85 dBA
Concrete Pump (Truck)	82 dBA
Concrete Vibrator	76 dBA
Crane	83 – 88 dBA
Dozer	85 dBA
Generator	82 dBA
Grader	85 dBA
Jack Hammer	88 dBA
Loader	80 dBA
Paver	85 dBA
Pile Driver (Impact)	101 dBA
Pneumatic Tool	85 dBA
Pump	77 dBA
Shovel	82 dBA
Truck	84 dBA

Source: FTA Transit Noise and Vibration Impact Assessment Manual, 2018.

Industry & Other Non-Transportation Noise Sources

A wide variety of industrial and other non-transportation noise sources are located in Seattle. These include manufacturing plants, marine shipping facilities, landfills, treatment plants (e.g., water), food packaging plants and lumber mills, and other general industrial facilities. Noise generated by these sources varies widely and are often intermittent but can exceed 80 dBA close to the source for some activities (City of Seattle, 2022). Noise generated by these sources varies widely, but in many cases may be a significant contributor to a local noise environment.

Noise Levels in Seattle

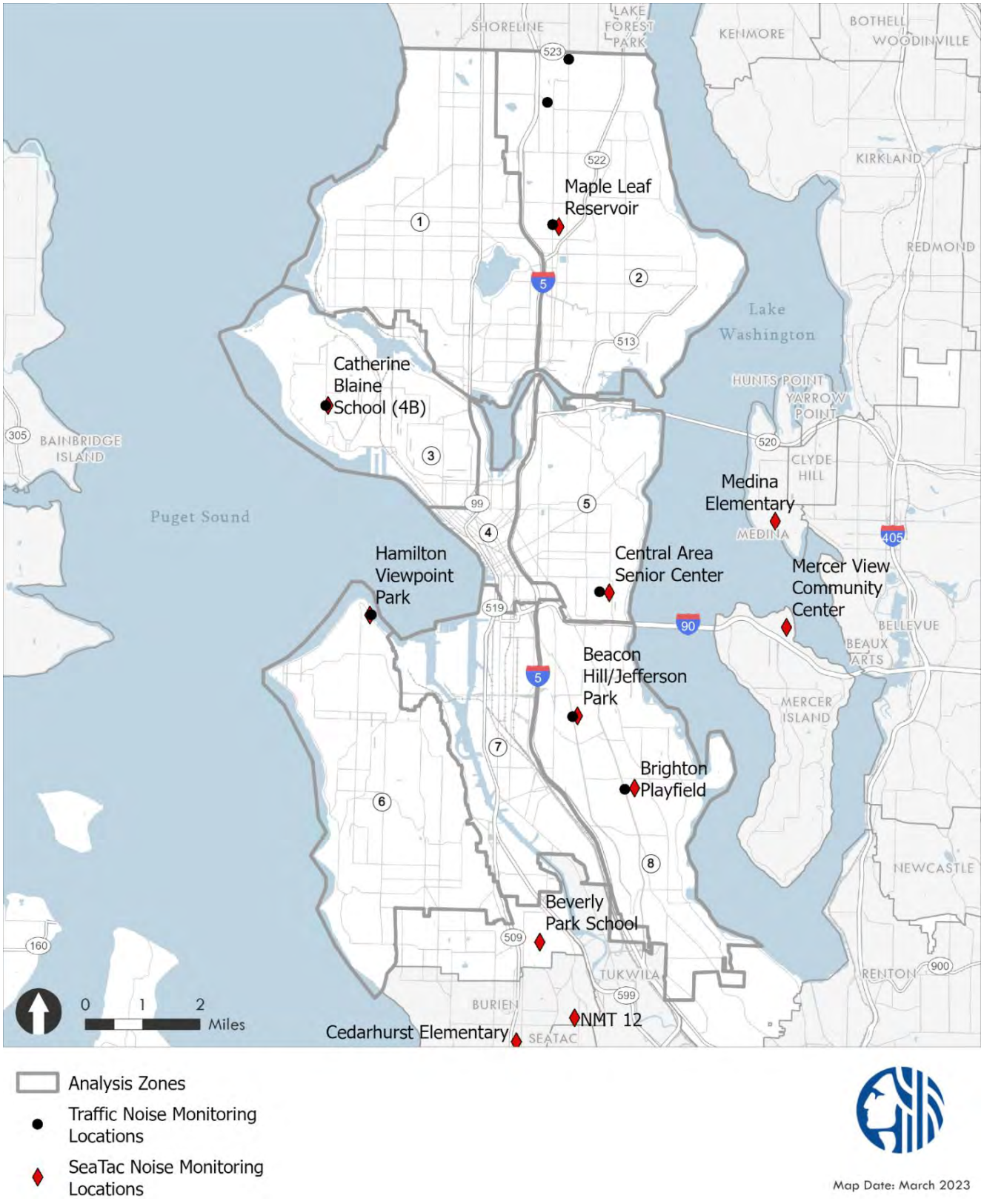
The most recent full year of ambient noise data in Seattle from the Port of Seattle's Aircraft Noise Monitoring System is shown in **Exhibit 3.5-12**. As indicated in **Exhibit 3.5-12**, measured ambient noise levels at various locations throughout the City range from 52.3 dBA L_{eq} to 62.0 dBA L_{eq} and are typical of developed urban areas. In addition, the average annual maximum (or instantaneous) noise levels reach 88.1 dBA but are short in duration and typically only last a few seconds; see **Exhibit 3.5-12**. Maximum noise levels can occur from cars or trucks passing by, train horns, emergency vehicle sirens, and other high-generating noise sources. It is noted there are slightly higher noise levels at the Jefferson Park noise monitoring station, which may reflect an increase of nearly 80,000 take-offs and landings at Seattle-Tacoma International airport between 2020 and 2021, a recovery in air traffic from the COVID-19 pandemic. This noise monitor is directly beneath the flight path for Seattle-Tacoma International Airport, and the Beacon Hill neighborhood of Seattle is more affected my aircraft noise than other areas within Seattle covered by the Port's noise monitoring system; see **Exhibit 3.5-13**.

Exhibit 3.5-12. Average Annual Noise Level (most recent complete year) for Selected Monitoring Locations in Seattle

Measurement Location (Noise Monitoring Location)	Avg Annual L_{eq} dBA	Avg Annual L_{max} dBA
NMT3: Maple Leaf Reservoir (2020)—Area 2: NE Seattle	54.7	83.4
NMT4: Catherine Blain School (2020)—Area 3: Queen Anne/Magnolia	52.3	80.6
NMT6: Hamilton Viewpoint Park (2020)—Area 6: West Seattle	58.1	82.9
NMT7: Central Area Senior Center (2020)—Area 5: Capitol Hill/Central District	54.7	83.4
NMT9: Jefferson Park (2021)—Area 8: SE Seattle	62.0	88.1
NMT10: Brighton Playfield (2020)—Area 8: SE Seattle	54.7	85.7

Source: Port of Seattle, 2022.

Exhibit 3.5-13. Noise Monitoring Locations



Source: Kimley Horn, 2023.

Sensitive Receivers

Noise-sensitive land uses are generally defined as locations where people reside or where the presence of unwanted sound could adversely affect the use of the land. Noise-sensitive land uses typically include residences, hospitals, schools, transient lodging, libraries, and certain types of recreational uses. Noise-sensitive residential receivers are found throughout the study area.

Analysis Areas

Area 1: NW Seattle

The predominant source of noise in the Northwest Seattle subarea is from transportation. The Sound Transit N line runs along the western edge of this area. The line operates locomotives, with anywhere from 2-7 passenger railcars. This railway also services BNSF freight locomotives and Amtrak passenger rail. The U.S. Department of Transportation National Transportation Noise Map (U.S. Department of Transportation, 2018) illustrates that areas near the rail line are typically in the upper 50 dBA LA_{eq} range for 24-hour noise levels. While rail operations generate significant noise levels in the immediate vicinity of the railways, train operations are infrequent and area railways are widely dispersed. In addition, the contribution of rail noise to the overall ambient noise environment in this subarea is relatively minor compared to other sources such as traffic. The most notable traffic noise sources in the Northwest Seattle area are from Highway 99, 15th Ave NW, and Holman Rd NW. The biggest contributor to noise in this area is proximity to I-5, with 24-hour LA_{eq} levels reaching over 70 dBA when in close proximity. For most areas outside major roadways, ambient noise levels are observed to be minimally affected by traffic noise. Industrial Marina areas are also present along the southern limit of the area near Lake Union and contribute to the existing noise environment.

Area 2: NE Seattle

The noise environment in the Northeast Seattle subarea is mainly comprised of roadway traffic and rail transit noise. A portion of the Sound Transit Link 1 Line traverses through the southernmost portion of this subarea in a northwest direction to Northgate, transitioning from a tunnel to an elevated track profile north of N 92nd Street in Maple Leaf. This area also has notable roadway traffic noise, primarily from Highway 522 and 513, and I-5 along the western border of this subarea trending in a north-south direction. The University District and the uses associated with the University of Washington are also a source of noise from road traffic and a concentration of human activity and sporting events. Marina areas are also present along the southern limit of the area near Lake Union and contribute to the existing noise environment.

130th/145th Station Area

The 130th/145th Station Area (Station Area) is located within the Pinehurst and Haller Lake neighborhoods. Most of the Station Area consists of a mix of single- and multi-family residential uses. However, approximately 16% of the area within a half mile of the Station Area is

comprised by the Jackson Park Golf Course, and a smaller portion of the Station Area is comprised of commercial and institutional (school) uses. The primary noise source in this area is road noise from I-5 freeway traffic and adjacent Sound Transit railways.

Area 3: Queen Anne/Magnolia

The same rail line that traverses Northwest Seattle (Sound Transit N Line) continues through the Queen Anne/Magnolia subarea, with Sound Transit Sounder Locomotives, Amtrak passenger rail and BNSF freight lines. Furthermore, the Balmer Yard in Interbay is an 80-acre rail yard with 41 parallel tracks. This industrial area that separates Queen Anne and Magnolia extends to the smith cove terminal, where cruise ships often dock. The National Transportation Noise Exposure Map shows that areas near the industrial sector experience noise levels up to 50 dBA for 24-hour LA_{eq} levels. Significant sources of roadway traffic noise include the Magnolia Bridge, 15th Ave W, Elliot Ave W, and Nickerson St.

Area 4: Downtown/Lake Union

The Downtown/Lake Union subarea has the highest concentration of roadway traffic noise of all subareas, which is to be expected with high traffic volumes in densely developed urban areas. Noise travels further and in various directions in this subarea due to the amount of sound reflective hard surfaces such as tall concrete buildings and a majority of concrete groundcover. I-5 is the largest contributor to traffic noise in the Downtown/Lake Union area; however, Alaskan Way, Mercer Street, and Aurora Ave/Highway 99 are also significant road noise sources, reaching into the 60-70 dBA range for 24-hour LA_{eq} levels. The National Transportation Exposure Map (Seto, 2023) shows noise levels within this subarea ranging from 50 dBA LA_{eq} in the central Downtown areas up to approximately 80 dBA LA_{eq} near I-5.

Area 5: Capitol Hill/Central District

I-5, Highway 90, and Highway 520 are the major sources of noise in the Capitol Hill/Central District subarea. 23rd Ave, Boren Ave, Madison St, and ML King Jr Way are also high-traffic roadways that are notable roadway noise sources. The Seattle Streetcar First Hill Line passes through this subarea, running north-south along Broadway. In addition, a portion of the Sound Transit Link 1 Line traverses through the western portion of this subarea in a north-south direction. This area is primarily residential, with very few industrial sources of noise.

Area 6: West Seattle

The significant roadway noise sources in the West Seattle subarea are the West Seattle Bridge, California Ave S, Fauntleroy Way SW, 35th Ave SW, Delridge Way SW, W Marginal Way, and SW Roxbury St. The northern areas of this subarea are located close to Terminal 5 and Harbor Island, both parts of the Port of Seattle. In this industrial area is also Nucro Steel, which along with the port, brings in additional freight train traffic.

Area 7: Duwamish

Boeing Field is located in the southeastern portion of the Duwamish subarea, and therefore this subarea has the highest levels of airplane noise. Areas near the airport experience noise levels in 75-80 dBA range, while the majority of the subarea is located within the 60-70 dBA noise level contour range. This area also contains two large rail yards, the Union Pacific Argo Yard and BNSF Stacy Yard. This area also contains a large portion of the Port of Seattle. These intermodal facilities run year-round every day. This subarea is predominantly comprised of industrial uses, with some residences located in the southern portion adjacent to the Boeing Field Airport and separated by the Duwamish waterway, which is roughly 500 feet in width. This area also includes the Sound Transit's Link OMF Central, which maintains the light rail trains that service Seattle. This area also has significant noise sources from Highway 99 and Highway 509, as well as the I-5 freeway.

Area 8: SE Seattle

The westernmost portion of the Southeast Seattle subarea is located within the 60-65 noise contour for Boeing Field, while the southwestern portion of this subarea is located within the 60-75 noise contour near the I-5 and Highway 90 interchange. The most notable roadway traffic noise sources are S Columbian Way, Martin Luther King Jr Way S and Rainer Ave S, as well as I-5 and I-90. The Sound Transit's Link Light Rail 1 line runs along Martin Luther King Jr Way S. The Beacon Hill Seattle Noise Project (Seto, 2018) collected 24-hour noise measurements during the spring and summer of 2018 and observed areas with high levels. The sites with the highest noise readings were located near the three notable roadways mentioned above (S Columbian Way, Martin Luther King Jr Way S and Rainer Ave S).

3.5.2 Impacts

Impacts Common to All Alternatives

Construction Noise & Vibration Impacts

The proposed alternatives envision future residential and job growth primarily within urban centers and villages, and also focus growth in compact, walkable, mixed-use neighborhoods linked by transit. Resulting construction activities associated with development of new residences, commercial and retail land uses, and mixed-use developments would have the potential to temporarily affect nearby sensitive receivers such as existing residences, schools, and nursing homes.

Temporary construction noise and vibration within the identified growth areas would occur in urban or suburban areas where ambient noise and vibration levels are influenced by roadway traffic and other transportation sources and would therefore be less noticeable to noise-sensitive receivers than if these activities were to occur in undeveloped areas of the City.

Section 25.08.425 of the Seattle Municipal Code establishes construction noise standards that limit construction activities to times when construction noise would have the least effect on adjacent land uses, and restrict the noise generated by various pieces of construction equipment. Development under the alternatives would range from the construction of high-rise residences in urban centers to townhomes and detached homes in corridors and residential neighborhoods. Consequently, depending on the extent of construction activities involved and background ambient noise levels, localized construction-related noise effects could vary widely.

Construction activities with the highest potential for construction-related noise or vibration impacts are those that require pile driving or other similar invasive foundation work. These types of construction activities are generally associated with high-rise development which all alternatives envision to occur within urban centers.

The Seattle noise ordinance restricts the use of impact equipment, such as pile drivers, to 8 AM to 5 PM on weekdays and 9 AM to 5 PM on weekends and holidays and limits their operation to a continuous noise level of 90 dBA and a maximum noise level of 99 dBA L_{max} when measured at a reference distance of 50 feet.

Because development within urban centers may require pile driving adjacent (within 50 feet) to other buildings that could be occupied by residents or other sensitive receptors, construction noise impacts in excess of 90 dBA within these areas are identified as a potential moderate noise impact and mitigation is identified.

The City of Seattle does not enforce quantitative vibration standards. Construction-related vibration impacts from pile driving and other construction equipment are generally assessed in environmental review documents using the methodology of the Federal Transit Administration (FTA) which includes standards for structural damage as well as for human annoyance.

Pile driving can result in peak particle velocities (PPV) of up to 1.5 inches per second (in/ sec) at a distance of 25 feet (FTA 2018), but typically average about 0.644 PPV. The FTA utilizes a threshold of architectural damage for conventional sensitive structures of 0.3 in/sec PPV for new residential structures and modern commercial buildings and 0.2 in/sec PPV for historic and older buildings. Therefore, a potentially significant vibration impact related to structural damage could occur when pile driving is proposed within 50 feet of a historic building. Thus, mitigation is recommended to reduce potential construction vibration impacts related to pile driving.

Vibration levels can also result in interference or annoyance impacts for residences or other land uses where people sleep, such as hotels and hospitals. The FTA methodology for vibration annoyance is dependent on the frequency of the events. When vibration events occur more than 70 times per day, as is typically the case with pile driving, they are considered "frequent events." Frequent events in excess of 72 VdB are considered to result in a significant vibration impact. However, the prohibited construction hours within the City's Ordinance are sufficient to avoid sleep interference impacts during times that most people sleep.

Land Use Compatibility

As discussed above, exterior noise levels in Seattle close to highways, freeways, and high traffic roadways can exceed 65 dBA L_{dn}. The 65 dBA L_{dn} noise level is important because it represents the exterior noise level which can be reduced to 45 dBA L_{dn} using standard construction techniques. An interior noise level of 45 L_{dn} is the commonly accepted maximum interior noise level for residential uses (HUD 2023). Most alternatives seek to locate residential uses near transit or highly traveled roadways to reduce vehicle miles traveled within the city. As indicated in **Exhibit 3.5-8** through **Exhibit 3.5-10** and **Exhibit 3.5-14**, new sensitive receptors (e.g., residential uses) could be located within noise contours up to 65 dBA L_{dn} (or greater) due to proximity to roadway, rail, and airport noise sources. Consequently, if residences or other noise-sensitive land uses are located in close proximity to major roadways or freeways or noise-generating industrial operations, additional insulation, window treatments, or noise abatement features may be warranted to reduce interior noise levels to acceptable levels. On the other hand, if an active industrial development is proposed adjacent to noise-sensitive land uses, noise compatibility problems could also arise. The potential for future or current to experience roadway noise or stationary noise from industrial or other noise-generating developments would be a potential moderate noise impact and mitigation measures could be considered.

As discussed below, traffic noise levels for all alternatives would increase by less than 1.5 dBA along all roadway segments modeled roadways. Outside of the laboratory, a 3-dBA change is considered a just-perceivable difference, and a 5-dBA change is clearly perceptible and is typically considered substantial. Consequently, an increase of less than 1.5 dBA would be considered a minor impact on environmental noise. While the traffic noise impacts would not be discernible from background noise levels, all of the alternatives are anticipated to result in a cumulative noise increase from stationary sources (e.g., mechanical equipment, parking lot noise, conversations, etc.) due to the intensity, scale, and nature of development associated with these alternatives. Noise increases from the alternatives could worsen noise levels in some areas that experience high noise levels under existing conditions that are considered healthy for residential and other sensitive uses. However, noise levels from stationary sources would be required to comply with the exterior sound level limits outlined in the City's Noise Ordinance (SMC Chapter 25.08). Following compliance with the City's Noise Ordinance, stationary noise source impacts from all alternatives would not be significant.

130th/145th Station Areas

Operational noise impacts to sensitive receptors in the Station Area were evaluated in the Sound Transit Lynwood Link Extension Final Environmental Impact Statement (Sound Transit, 2015) (Lynwood Link Extension Final EIS) and SR 522 Bus Rapid Transit (BRT) SEPA Environmental Checklist (SR 522 BRT SEPA Checklist). According to the Lynwood Link Extension Final EIS and SR 522 BRT SEPA Checklist, operational noise levels from BRT buses at the 145th Station, and light rail pass-bys along the Lynwood Link Extension would result in unnoticeable changes in ambient noise at sensitive receptors in the Station Area. In addition, sound walls are proposed to the south of the 130th Street Station along the northbound I-5/Lynwood Link Extension line that would reduce transit and highway traffic noise levels at existing and future residential receptors.

Construction noise impacts were also evaluated in the Lynwood Link Extension Link Final EIS and SR 522 BRT SEPA Checklist. According to the construction noise analyses in these documents, some construction activities may exceed 80 dBA at residences closest to the Station Area construction sites. In addition, some construction activities might be required during nighttime hours because of the nature of the construction, to avoid daytime traffic impacts, or to accommodate adjacent land uses. Nighttime construction would require a noise variance from the City in order to proceed. Construction noise impacts and mitigation measures were identified for sensitive receptors closest to the stations and rail alignment areas in the Lynwood Link Extension Link Final EIS and SR 522 BRT SEPA Checklist. The One Seattle Comprehensive Plan would not result in additional construction noise impacts in the Station Area than those already identified in these environmental documents.

Equity & Climate Vulnerability Considerations

Exposure to Noise Pollution

Future growth and development patterns under Comprehensive Plan growth strategies would affect future residences' (or other "sensitive receptors" or "sensitive receivers) relationships to mobile and stationary noise sources. The degree of potential for adverse impacts on new sensitive receptors would depend on proximity to major sources of noise and the density of future sensitive development.

Portions of Seattle located along major roadways (freeways and the most-traveled highways) are exposed to relatively high noise levels. The U.S. Department of Housing and Urban Development (HUD) utilizes a screening distance of 1,000 feet of highways or major roadways, 3,000 feet for railroads, and 15 miles for FAA-regulated airfields to evaluate transportation noise effects at sensitive receivers. These distances represent the approximate minimum distance at which a "Normally Acceptable" noise level of 65 dBA L_{dn} is achieved in proximity to the aforementioned transportation noise sources (HUD 2023). Because the authority to set noise standards for off-road and other non-highway vehicles lies with the Washington State

Department of Ecology, and for locomotives with the Federal Rail Administration (FRA), the only strategies available to the City for consideration are related to reducing exposure. Measures such as setbacks for residential and other sensitive land uses from major traffic corridors and rail lines are effective. Other methods to protect sensitive land uses from being exposed to substantial transportation noise levels include noise abatement and insulation requirements for new sensitive uses, and site design measures to block or obstruct transportation noise sources from residences.

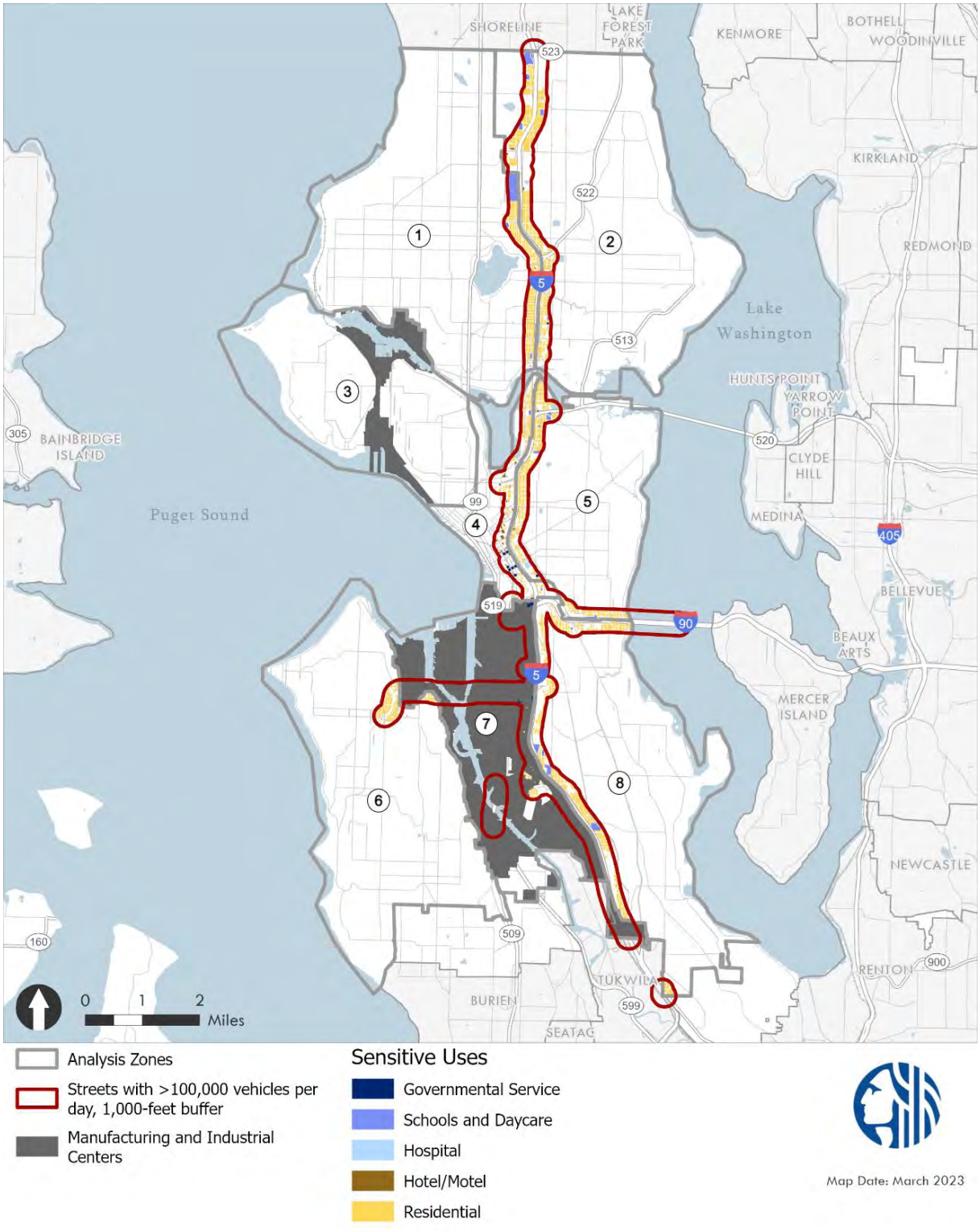
Portions of Seattle are also exposed to elevated stationary noise sources from industrial uses and ports where ships, heavy trucks, and mechanical equipment can result in increased noise levels at sensitive uses. This is considered a moderately adverse noise impact. The City has identified measures to reduce potential noise compatibility conflicts from industrial/maritime centers and noise-sensitive receivers through mitigation measures identified in the Seattle Industrial and Maritime Lands Final EIS (2022). Potential mitigation includes installing noise barriers, siting truck haul routes away from noise sensitive areas, and using green open spaces as noise buffers.

Exhibit 3.5-14 shows a 1,000-feet buffer around roadways and highways with daily trips greater than 100,000 vehicles. This shows that existing uses along Interstate 5 (I-5) north of Interstate 90 (I-90) consist primarily of residential uses, within 1,000 feet of transportation noise sources. **Exhibit 3.5-9** above shows a 3,000-foot buffer around above ground freight railways, which also indicates that residences are the primary noise-sensitive land use near freight railways.

This potential increased exposure to transportation noise is considered a potential moderate adverse impact.

To address the impact, the City could consider risk-reducing mitigation strategies such as setbacks for residential and other sensitive land uses from major traffic corridors, rail lines, port terminals, and similar sources of transportation and stationary noise, and/or to identify measures for sensitive receptors proposed to be in areas near such sources such as upgraded windows treatments, noise barriers, and noise insulation design features.

Exhibit 3.5-14 1,000-Feet Buffer Around Freeways and Roadways with Greater than 100,000 Daily Vehicles



Source: Kimley Horn, 2023.

Impacts of Alternative 1: No Action

Future development under Alternative 1 would result in increased vehicle traffic on roadways throughout the Seattle area. To quantify the degree of noise increases, traffic noise was modeled to assuming an annual growth rate of VMT of 0.37%, consistent with the transportation analysis. Resultant noise levels are presented in **Exhibit 3.5-15** and compared to existing conditions at the same roadside distance, 150 feet from the roadway center for major roadways throughout the city. As shown in **Exhibit 3.5-15**, Alternative 1 would result in traffic noise increases ranging from 0.1 dBA L_{dn} to 1.0 dBA L_{dn} and would not result in a significant (10 dBA or more) dBA noise increase.

Exhibit 3.5-15. Modeled Noise (L_{dn}) Levels at 150 Feet From the Roadway Center—Alternative 1, No Action (2044)

Roadway	Roadway Segment	Existing	2044 Alt. 1	dBA Difference Over Existing	Significant Increase?
Martin Luther King Jr Way S	Between S Jackson St and S Massachusetts St	58.4	59.4	1.0	No
	Between S Orcas St and S Graham St	59.7	60.6	0.9	No
Harbor Ave SW/Alki Ave	Between SW Admiral Way and California Way SW	57.5	57.9	0.4	No
Beacon Ave S	Between S Spokane St and S Columbian Way	54.8	55.2	0.4	No
34th Ave W	Between W Barrett St and W McGraw St	54.3	54.7	0.4	No
Roosevelt Way NE	Between NE Northgate Way and 80th St	56.7	57.0	0.3	No
Roosevelt Way NE	Between 5th Ave NE and 10th Ave NE	60.9	61.0	0.1	No
15th Ave NE	Between NE 135th St and NE 145th St	58.9	59.8	0.9	No

Notes: Road center to receptor distance is assumed to be 150 feet for values shown in this table. Noise levels were determined using the Federal Highway Administration (FHWA) traffic noise model. The average speed on these segments is assumed to be the posted speed for each roadway.
Source: Kimley-Horn, 2023

Equity & Climate Vulnerability Considerations

As shown in **Exhibit 3.2-8** in **Section 3.2 Air Quality & GHG Emissions**, Alternative 1 would locate several urban centers and urban villages within 1,000-feet of roadways with greater than 100,000 daily vehicles. Collectively these urban centers and villages represent 56% of all projected residential growth in the city through 2044. Only a portion of each center or village is within the 1,000-feet buffer, so the potentially affected portion of the new residents would be smaller. Compared to all other alternatives, the number of units within the affected urban centers and villages would be the lowest (same as Alternative 3 and 4).

130th/145th Station Areas

Under Alternative 1, the current Comprehensive Plan and zoning designations would remain. Development around the 130th/145th Station Area would primarily be comprised of three-story single-purpose residential and some 4-8 story multifamily uses. The 130th/145th Station area would experience minimal traffic noise increases and stationary source noise levels (e.g., HVAC systems, parking noise, conversations, and other noise sources typical of urban areas) could increase, although not substantially due to the proximity to I-5, 145th Street, and other traffic noise sources that dominate the existing noise environment.

Impacts of Alternative 2: Focused

Development under Alternative 2 would result in increased vehicle traffic on roadways throughout the Seattle area. To quantify the degree of noise increases, traffic noise was modeled to assuming an annual growth rate of VMT of 0.43%, consistent with the transportation analysis. Resultant noise levels are presented in **Exhibit 3.5-16** and compared to existing conditions at the same roadside distance, 150 feet from the roadway center for major roadways throughout the city. As shown in **Exhibit 3.5-16**, Alternative 2 would result in traffic noise increases ranging from 0.4 dBA L_{dn} to 1.1 dBA L_{dn} and would not result in a significant (10 dBA or more) dBA noise increase. It should also be noted that the traffic noise levels shown in **Exhibit 3.5-16** would result in a minimal increase when compared to the No Action alternative (Alternative 1).

Exhibit 3.5-16. Modeled Noise (L_{dn}) Levels at 150 Feet From the Roadway Center—Alternative 2 (2044)

Roadway	Roadway Segment	Existing	2044 Alt. 2	dBA Difference Over Existing	Significant Increase?
Martin Luther King Jr Way S	Between S Jackson St and S Massachusetts St	58.4	59.5	1.1	No
	Between S Orcas St and S Graham St	59.7	60.6	0.9	No
Harbor Ave SW/Alki Ave	Between SW Admiral Way and California Way SW	57.5	57.9	0.4	No
Beacon Ave S	Between S Spokane St and S Columbian Way	54.8	55.4	0.6	No
34th Ave W	Between W Barrett St and W McGraw St	54.3	55.1	0.8	No
Roosevelt Way NE	Between NE Northgate Way and 80th St	56.7	57.4	0.7	No
Roosevelt Way NE	Between 5th Ave NE and 10th Ave NE	60.9	61.3	0.4	No
15th Ave NE	Between NE 135th St and NE 145th St	58.9	60.0	1.1	No

Notes: Road center to receptor distance is assumed to be 150 feet for values shown in this table. Noise levels were determined using the Federal Highway Administration (FHWA) traffic noise model. The average speed on these segments is assumed to be the posted speed for each roadway.
Source: Kimley-Horn, 2023.

Equity & Climate Vulnerability Considerations

In addition to the regional centers and villages that would be within the 1,000-feet buffer under Alternative 1, Alternative 2 would place additional neighborhood center units within the buffer, as shown in **Exhibit 3.2-10** in **Section 3.2 Air Quality & GHG Emissions**. Included in the additional units is the 130th/145th Station Area. Although a greater number of units would be closer to transportation noise sources and thus at higher risk than under Alternative 1, overall units within these regional centers, urban centers, and neighborhood centers consists of 46% of overall projected growth, which is higher than that of Alternative 1. Only a portion of each center is within the 1,000-feet buffer, so the potentially affected portion of the new residents would be smaller. Alternative 2 would place a greater number of units within the 1,000-foot buffer when compared to Alternative 1, 3, and 4, but fewer units compared to Alternative 5 and the Preferred Alternative.

130th/145th Station Areas

Under Alternative 2, the 130th/145th Station Area would be designated as neighborhood center and would include a mix of low-rise residential, midrise residential, and neighborhood commercial uses. The 130th/145th Station area would experience some traffic noise increases and stationary source noise levels could increase, although not substantially due to the proximity to I-5, 145th Street, and other traffic noise sources that dominate the existing noise environment. It is also noted that Alternative 2 would site residents and commercial/retail uses near transit hubs, which would likely reduce traffic and traffic noise levels associated with increased development in the area.

Impacts of Alternative 3: Broad

Development under Alternative 3 would result in increased vehicle traffic on roadways throughout the Seattle area. To quantify the degree of noise increases, traffic noise was modeled to assuming an annual growth rate of VMT of 0.41%, consistent with the transportation analysis. Resultant noise levels are presented in **Exhibit 3.5-17** and compared to existing conditions at the same roadside distance, 150 feet from the roadway center for major roadways throughout the city. As shown in **Exhibit 3.5-17**, Alternative 3 would result in traffic noise increases ranging from 0.5 dBA L_{dn} to 1.1 dBA L_{dn} and would not result in a significant (10 dBA or more) dBA noise increase. It should also be noted that the traffic noise levels shown in **Exhibit 3.5-17** would result in a minimal increase when compared to the No Action alternative (Alternative 1).

Exhibit 3.5-17. Modeled Noise (L_{dn}) Levels at 150 Feet From the Roadway Center—Alternative 3 (2044)

Roadway	Roadway Segment	Existing	2044 Alt. 3	dBA Difference Over Existing	Significant Increase?
Martin Luther King Jr Way S	Between S Jackson St and S Massachusetts St	58.4	59.4	1.0	No
	Between S Orcas St and S Graham St	59.7	60.7	1.0	No
Harbor Ave SW/Alki Ave	Between SW Admiral Way and California Way SW	57.5	57.9	0.4	No
Beacon Ave S	Between S Spokane St and S Columbian Way	54.8	55.6	0.8	No
34th Ave W	Between W Barrett St and W McGraw St	54.3	55.0	0.7	No
Roosevelt Way NE	Between NE Northgate Way and 80th St	56.7	57.5	0.8	No
Roosevelt Way NE	Between 5th Ave NE and 10th Ave NE	60.9	61.4	0.5	No
15th Ave NE	Between NE 135th St and NE 145th St	58.9	60.0	1.1	No

Notes: Road center to receptor distance is assumed to be 150 feet for values shown in this table. Noise levels were determined using the Federal Highway Administration (FHWA) traffic noise model. The average speed on these segments is assumed to be the posted speed for each roadway.
Source: Kimley-Horn, 2023.

Equity & Climate Vulnerability Considerations

As shown in **Exhibit 3.2-12** in **Section 3.2 Air Quality & GHG Emissions**, the regional centers and villages within the 1,000-feet buffer under Alternative 3 would be the same as Alternative 1, collectively representing 56% of all projected residential growth in the city through 2044. Only a portion of each center or village is within the 1,000-feet buffer, so the potentially affected portion of the new residents would be smaller. A greater proportion of city-wide growth would be located in close proximity to transportation-related noise sources when compared to Alternative 2. Alternative 3 would place the fewest number of units (the same as Alternative 1 and 4) within the 1,000-foot buffer when compared to Alternative 2 and 5 and the Preferred Alternative.

130th/145th Station Areas

The station area plan would not be implemented under Alternative 3; the area would grow based on the applicable citywide place types.

Impacts of Alternative 4: Corridor

The planned housing and job totals are similar in Alternative 4 as for Alternative 3, and traffic associated with Alternative 4 would be similar to (or less than) Alternative 3. For the purposes of this analysis, the traffic noise levels and increases from Alternative 3 also apply to

Alternative 4. Therefore, traffic noise level increases from Alternative 4 would not be significant (10 dBA or more) as discussed above.

Alternative 4 would focus more growth near transit and major highways/roadways than Alternatives 1 through 3. Due to the density of development near major transportation noise sources, the potential for noise compatibility issues from Alternative 4 is profound, and a moderately adverse noise impact would occur. However, implementation of mitigation measures would reduce this noise impact as discussed below.

Equity & Climate Vulnerability Considerations

As shown in **Exhibit 3.2-14** in **Section 3.2 Air Quality & GHG Emissions**, the regional centers and villages within the 1,000-feet buffer under Alternative 4 would be the same as Alternative 1 and Alternative 3, collectively representing 56% of all projected residential growth in the city through 2044. Only a portion of each center or village is within the 1,000-feet buffer, so the potentially affected portion of the new residents would be smaller. A greater proportion of city-wide growth would be located in close proximity to transportation-related noise sources when compared to Alternative 2. Alternative 4 would place the fewest number of units (the same as Alternatives 1 and 3) within the 1,000-foot buffer when compared to Alternative 2 and 5 and the Preferred Alternative.

130th/145th Station Areas

The station area plan would not be implemented under Alternative 4; the area would grow based on the applicable citywide place types.

Impacts of Alternative 5: Combined

Development under Alternative 5 would result in increased vehicle traffic on roadways throughout the Seattle area. To quantify the degree of noise increases, traffic noise was modeled to assuming an annual growth rate of VMT of 0.51%, consistent with the transportation analysis. Resultant noise levels are presented in **Exhibit 3.5-18** and compared to existing conditions at the same roadside distance, 150 feet from the roadway center for major roadways throughout the city. As shown in **Exhibit 3.5-18**, Alternative ~~3~~5 would result in traffic noise increases ranging from 0.5 dBA L_{dn} to 1.3 dBA L_{dn} and would not result in a significant (10 dBA or more) dBA noise increase. It should also be noted that the traffic noise levels shown in **Exhibit 3.5-18** would result in a minimal increase when compared to the No Action Alternative (Alternative 1).

Exhibit 3.5-18. Modeled Noise (L_{dn}) Levels at 150 Feet From the Roadway Center—Alternative 5 (2044)

Roadway	Roadway Segment	Existing	2044 Alt. 5	dBA Difference Over Existing	Significant Increase?
Martin Luther King Jr Way S	Between S Jackson St and S Massachusetts St	58.4	59.5	1.1	No
	Between S Orcas St and S Graham St	59.7	60.8	1.1	No
Harbor Ave SW/Alki Ave	Between SW Admiral Way and California Way SW	57.5	58.0	0.5	No
Beacon Ave S	Between S Spokane St and S Columbian Way	54.8	55.8	1.0	No
34th Ave W	Between W Barrett St and W McGraw St	54.3	55.0	0.7	No
Roosevelt Way NE	Between NE Northgate Way and 80th St	56.7	57.5	0.8	No
Roosevelt Way NE	Between 5th Ave NE and 10th Ave NE	60.9	61.5	0.6	No
15th Ave NE	Between NE 135th St and NE 145th St	58.9	60.2	1.3	No

Notes: Road center to receptor distance is assumed to be 150 feet for values shown in this table. Noise levels were determined using the Federal Highway Administration (FHWA) traffic noise model. The average speed on these segments is assumed to be the posted speed for each roadway.
Source: Kimley-Horn, 2023.

The growth strategy of Alternative 5 would result in a ~~the~~ dens~~est~~er concentration of sensitive uses near major highways/roadways, transit facilities, and industrial/maritime uses compared to Alternatives 1 through 4. Alternative 5 would result in less dense concentration of sensitive uses near major noise sources compared to the Preferred Alternative. ~~As a result, the highest conflict of noise and land use compatibility would occur with implementation of Alternative 5, and a~~ A moderately adverse noise impact would occur. However, implementation of mitigation measures would reduce this noise impact as discussed below.

Equity & Climate Vulnerability Considerations

This alternative would place the emphasis for growth near transit centers, with the 130th Street station designated as an urban center. In addition, additional neighborhood center units would be located in close proximity to transportation-related noise sources as shown in **Exhibit 3.2-16** in **Section 3.2 Air Quality & GHG Emissions**. Consistent across all alternatives, the highest amount of projected growth would be within the Downtown Regional Center and First Hill/Capitol Hill Regional Center. Alternative 5 and the Preferred Alternative have~~s~~ the highest housing studied growth ~~target~~ among the ~~five~~ alternatives. Although Alternative 5 and the Preferred Alternative would have the same housing growth assumption, the allocation of growth differs.

As a result, the proportion of city-wide growth that would be located in close proximity to transportation-related noise sources is the lowest (39%) under this alternative while the total amount of collective growth would be the greatest. Only a portion of each center or village is within the 1,000-feet buffer, so the potentially affected portion of the new residents would be smaller. Alternative 5 would place a greater~~the greatest~~ number of units within the 1,000-foot buffer when compared to Alternatives 1 through 4 and would place fewer units within the 1,000-foot buffer when compared to the Preferred Alternative~~the other alternatives~~.

130th/145th Station Area

Noise impacts at the Station Area would be most substantial under Alternative 5, which includes the strategies for encouraging housing growth in Alternatives 2, 3, and 4 plus some additional changes to existing regional center and urban center boundaries and changes to place type designations. Under this alternative, an urban center would be created on both the west and east sides of I-5 at the Sound Transit light rail station. As a result, the 130th/145th Station Area would experience higher traffic noise and stationary source noise increases than Alternatives 1 through 4 and the Preferred Alternative.

Impacts of Preferred Alternative

Note: The impacts analysis for the Preferred Alternative was added since the Draft EIS.

Development under the Preferred Alternative would result in increased vehicle traffic on roadways throughout the Seattle area. To quantify the degree of noise increases, traffic noise was modeled assuming an annual growth rate of VMT of 0.51%, consistent with the transportation analysis. Resultant noise levels are presented in **Exhibit 3.5-19** and compared to existing conditions at the same roadside distance, 150 feet from the roadway center for major roadways throughout the city. As shown in **Exhibit 3.5-19**, the Preferred Alternative would result in traffic noise increases ranging from 1.0 dBA L_{dn} to 2.4 dBA L_{dn} and would not result in a significant (10 dBA or more) dBA noise increase. Note that traffic noise would be reduced under the Preferred Alternative along 15th Avenue NE between NE 135th Street and NE 145th Street. It should also be noted that the traffic noise levels shown in **Exhibit 3.5-19** would result in a minimal increase when compared to the No Action Alternative (Alternative 1).

Exhibit 3.5-19. Modeled Noise (L_{dn}) Levels at 150 Feet From the Roadway Center—Preferred Alternative (2044)

Roadway	Roadway Segment	Existing	2044 Preferred Alt	dBA Difference Over Existing	Significant Increase?
Martin Luther King Jr Way S	Between S Jackson St and S Massachusetts St	58.4	59.7	1.3	No
	Between S Orcas St and S Graham St	59.7	60.9	1.2	No
Harbor Ave SW/Alki Ave	Between SW Admiral Way and California Way SW	57.5	58.6	1.1	No
Beacon Ave S	Between S Spokane St and S Columbian Way	54.8	57.2	2.4	No
34th Ave W	Between W Barrett St and W McGraw St	54.3	55.8	1.5	No
Roosevelt Way NE	Between NE Northgate Way and 80th St	56.7	58.3	1.6	No
Roosevelt Way NE	Between 5th Ave NE and 10th Ave NE	60.9	61.9	1.0	No
15th Ave NE	Between NE 135th St and NE 145th St	58.9	58.7	-0.2	No

Notes: Road center to receptor distance is assumed to be 150 feet for values shown in this table. Noise levels were determined using the Federal Highway Administration (FHWA) traffic noise model. The average speed on these segments is assumed to be the posted speed for each roadway.
Source: Kimley-Horn, 2024.

The growth strategy of Preferred Alternative would result in the densest concentration of sensitive uses near major highways/roadways, transit facilities, and industrial/maritime uses. As a result, the Preferred Alternative has the highest conflict of noise and land use compatibility and would result in a moderately adverse noise impact. However, implementation of mitigation measures would reduce this noise impact as discussed below.

Equity & Climate Vulnerability Considerations

This alternative would place the emphasis for growth near transit centers, with the 130th Street station designated as an urban center. In addition, additional neighborhood center units would be located in close proximity to transportation-related noise sources as shown in **Exhibit 3.2-18** in **Section 3.2 Air Quality & GHG Emissions**. Consistent across all alternatives, the highest amount of projected growth would be within the Downtown Regional Center and First Hill/Capitol Hill Regional Center. The Preferred Alternative has the highest housing growth compared to Alternatives 1 through 4 and would be the same as Alternative 5. As a result, the proportion of citywide growth that would be located in close proximity to transportation-related noise sources is the lowest (40%) under this alternative while the total amount of collective growth would be the greatest. Only a portion of each center or village is within the 1,000-feet buffer, so the potentially affected portion of the new residents would be smaller. The Preferred Alternative would place the greatest number of units within the 1,000-foot buffer when compared to the other alternatives.

130th/145th Station Area

Noise impacts at the Station Area would be substantial under the Preferred Alternative, less than only Alternative 5, which includes the strategies for encouraging housing growth in Alternatives 2, 3, and 4 plus some additional changes to existing regional center and urban center boundaries and changes to place type designations. Under this alternative, an urban center would be created on both the west and east sides of I-5 at the Sound Transit light rail station. As a result, the 130th/145th Station Area would experience higher traffic noise and stationary source noise increases than Alternatives 1 through 4 and less than Alternative 5.

3.5.3 Mitigation Measures

Incorporated Plan Features

The City will update its Comprehensive Plan policies for land use, transportation, and others with an opportunity to increase noise compatibility with sensitive receptors in proximity to significant transportation and industrial noise sources.

Regulations & Commitments

City noise regulations establish exterior sound level limits for various land use zones with the limits varying depending on the source zone and the receiving zone (**Exhibit 3.5-5**). These limits are intended to result in acceptably low interior noise levels for residences and other sensitive noise receptors. City noise regulations also address construction noise, limiting the times during the day when construction noise, both impact and non-impact, can exceed exterior noise limits (**Exhibit 3.5-6**).

Other Potential Mitigation Measures

Measures to Reduce Construction-Related Noise and Vibration Impacts

In addition to restrictions on the hours of construction in accordance with the Seattle Noise Ordinance, other mitigation that could be applied includes:

- Installing barriers to shield noise sensitive receptors and enclosing stationary work
- Selecting haul routes to avoid noise sensitive areas
- Using fully baffled compressors, or preferably electric compressors
- Using fully mufflered construction equipment
- Use low-noise emission equipment
- Monitor and maintain equipment to meet noise limits
- Prohibit aboveground jack hammering and impact pile driving during nighttime hours.

To reduce potential moderate adverse noise impacts from impact pile driving activities adjacent to noise-sensitive land uses (within 50 feet) or moderate adverse vibration impacts to historic structures, the One Seattle Comprehensive Plan could consider adoption of a policy recommending the Seattle Noise Ordinance be updated to require best practices for noise control, including "quiet" pile-driving technology (such as pre-drilling of piles, use of sonic or vibratory drivers instead of impact pile drivers, where feasible); and using temporary sound walls or cushion blocks to dampen impact noise from pile driving).

Measures to Reduce Land Use Compatibility Noise Impacts

Although mitigation measures are not required due to a lack of significant adverse impact findings, to reduce the potential for exposure of residences and other noise-sensitive land uses to incompatible environmental noise, the One Seattle Plan could consider adoption of a policy that recommends that residences and other noise-sensitive land uses (i.e., schools, day care) be separated from freeways, railways, ports, and other active industrial facilities where exterior noise environments exceed 65 dBA L_{dn}. If sensitive land uses are proposed in such areas, a policy addressing the need for additional mitigation strategies could be considered to achieve an interior noise performance standard of 45 dBA L_{dn}. The types of implementation measures that could help to accomplish this include:

- Coordination with WSDOT on sound wall construction where major highways pass through residential areas.
- Use of appropriate building materials such as walls and floors with an STC rating of 50 or greater as necessary to achieve this performance standard.
- Site design measures, including use of window placement to minimize window exposure toward noise sources, avoid placing balcony areas in high noise areas, and use of buildings as noise barriers.
- Use of acoustically rated building materials (insulation and windows).

In addition, zoning land use criteria or boundaries could be established, while meeting other planning goals, to limit the proximity of new residential development to known or anticipated sources of high noise levels.

3.5.4 Significant Unavoidable Adverse Impacts

Under all studied alternatives, increased residential and employment growth could result in increased traffic volumes, though the resulting noise increases are not anticipated to exceed 3dBA, the threshold of change that is perceptible. The location of noise sensitive receivers (e.g., residential uses) near traffic, rail, or industrial noise sources could occur under all alternatives, particularly Alternatives 4 and 5 and the Preferred Alternative. Implementation of residential noise mitigation described in the previous subsection should adequately reduce noise experienced by noise-sensitive receivers. With the application of mitigation measures described above, no significant unavoidable adverse noise impacts would occur under any of the alternatives.

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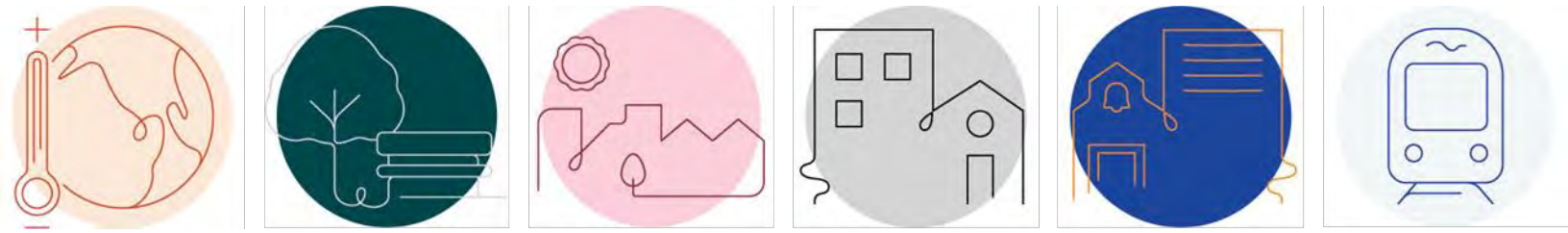
3.6 Land Use Patterns & Urban Form



Source: City of Seattle, 2023.

This section summarizes the affected environment—including the current policy and regulatory frameworks, current land and shoreline uses, physical form, and views—and compares impacts of the alternatives on land use patterns and urban form in the city. The analysis focuses on changes in activity levels and compatibility of change in land use and shoreline patterns, as well as potential changes to physical conditions and views. This includes a review of land use patterns and compatibility, urban form (height, bulk scale, transitions, and tree canopy), shadows, and views in the study area and at the analysis area level (where applicable) as well as resulting equity and climate vulnerability considerations. Details of the thresholds of significance are shared in **Section 3.6.2**. Mitigation measures and a summary of any significant unavoidable adverse impacts are included following the impacts analysis.

3.6.1 Affected Environment

This section begins with a discussion of the historical context of planning and land use decisions in Seattle. This is followed by a summary of the existing policy and regulatory frameworks—including policies and regulations regarding the height, bulk, and scale of development as well as shadows, and public views—and the resulting general development patterns citywide and by analysis area. The summary addresses land use patterns and development character in Seattle and provides a baseline for analyzing the impacts of the alternative growth scenarios. **Section 3.7 Relationship to Plans, Policies, & Regulations** addresses related topics in greater detail, including the Washington State Growth Management Act (GMA), PSRC's VISION 2050 and Multi-County Planning Policies (MPPs), King County's County-Wide Panning Policies (CPPs), and the City's current Comprehensive Plan.

Overview of Historical Planning & Land Use Decisions

The study area was inhabited extensively by Coast Salish peoples for thousands of years prior to the presence of White settlers in the region. Before European contact, the region was one of the most populated centers in North America. The Indians of the Eastern Puget Sound lived in relatively small, autonomous villages and spoke variations of Lushootseed (*txʷəlšucid*, *dxʷləšúcid*), one of the Coast Salish languages. Many tribes were affiliated through intermarriage, political agreement, trade, and material culture. Indigenous people lived in permanent villages of longhouses or winter houses, and traditionally left their winter residences in the spring, summer, and early fall in family canoes to travel to temporary camps at fishing, hunting, and gathering grounds. At the time of the first White settlements around 1850, natives were living in more than 90 longhouses in at least 17 villages in modern-day Seattle.

This section incorporates evaluation written by City staff from the 2022 Seattle Industrial and Maritime Strategy Final EIS. Additional context was added here to expand the discussion citywide beyond industrial and maritime areas.

See **Section 3.9 Cultural Resources** for a more detailed history of indigenous and non-indigenous people in Seattle as well as an overview of historic, archaeological, and other cultural resources in the study area.

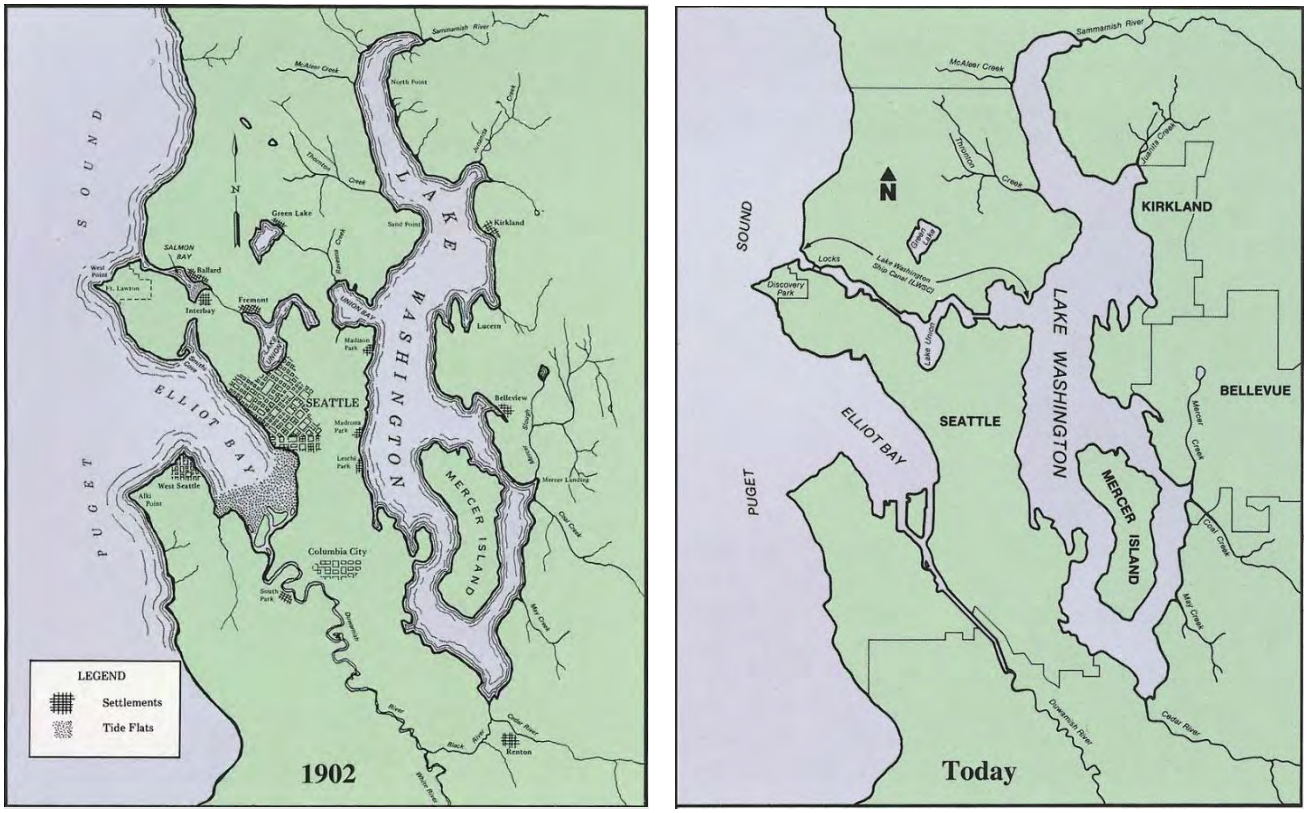
Waterways were central to the cultures and livelihoods of native people. "Duwamish" is the Anglo-Europeanized word which meant "people of the inside", *dxʷdəwʔabš*, referencing the interior waters of the Duwamish, Black and Cedar rivers. The Suquamish take their name from the Lushootseed phrase for “people of the clear salt water”, and the people living around Lake Washington were collectively known as *hah-choo-AHBSH* or *hah-chu-AHBSH* or *Xacuabš*, People of *HAH-choo* or *Xachu*, "People of a Large Lake" or "Lake People."

Early Alterations to Seattle’s Lands & Waterways

Seattle was incorporated in 1869, eighteen years after the first white settlers arrived. Physical alteration of the land and waterways by white settlers is important context for a discussion of land use today. Seattle’s land and waterways looked very different prior to construction of the Lake Washington ship canal and other alterations. A series of separate lakes that natives transited with over-land portages, for example, were previously in the location of present day Lake Union. The Lushootseed name for present day Lake Union was *tenas Chuck* or *XáXu7cHoo* ("small great-amount-of-water"), present day Lake Washington was called *hyas Chuck* or *Xacuabš* ("great-amount-of-water"), and the present-day area of the Montlake Cut was called "Carry a Canoe."

Early development viewed Seattle’s topography as an obstacle to growth. Construction on a system of locks and cut waterways connecting east to west began in 1911 and culminated in 1916 (see **Exhibit 3.6-1**). Waters were connected from Lake Washington’s Union Bay to Lake Union to Salmon Bay though a series of locks to Shilshole Bay. Lake Washington’s waters were partially drained as a result, lowering the level of the lake by 8.8 feet and drying up more than 1,000 acres of wetlands. Construction of the ship canal and locks resulted in further changes to rivers flows at the south end of Lake Washington. Prior to the alterations, Lake Washington emptied from its south end into the Black River (which no longer exists). The Black River is connected to the Duwamish River, which outlets as it does today to Elliott Bay. The Cedar River—which had previously flowed into the Black River in Renton—was diverted in 1912 directly into the south end of Lake Washington to reduce flooding in Renton. The remaining portion of the Black River dried up in 1916 when Lake Washington’s level dropped. Several Indigenous villages were located near the confluence of the Black and Duwamish rivers and the area was long used as a place of refuge. When the Black River vanished, native people were displaced from the area.

Exhibit 3.6-1. Seattle's Shoreline Over Time



Source: Burke Museum, The Waterlines Project, 2009.

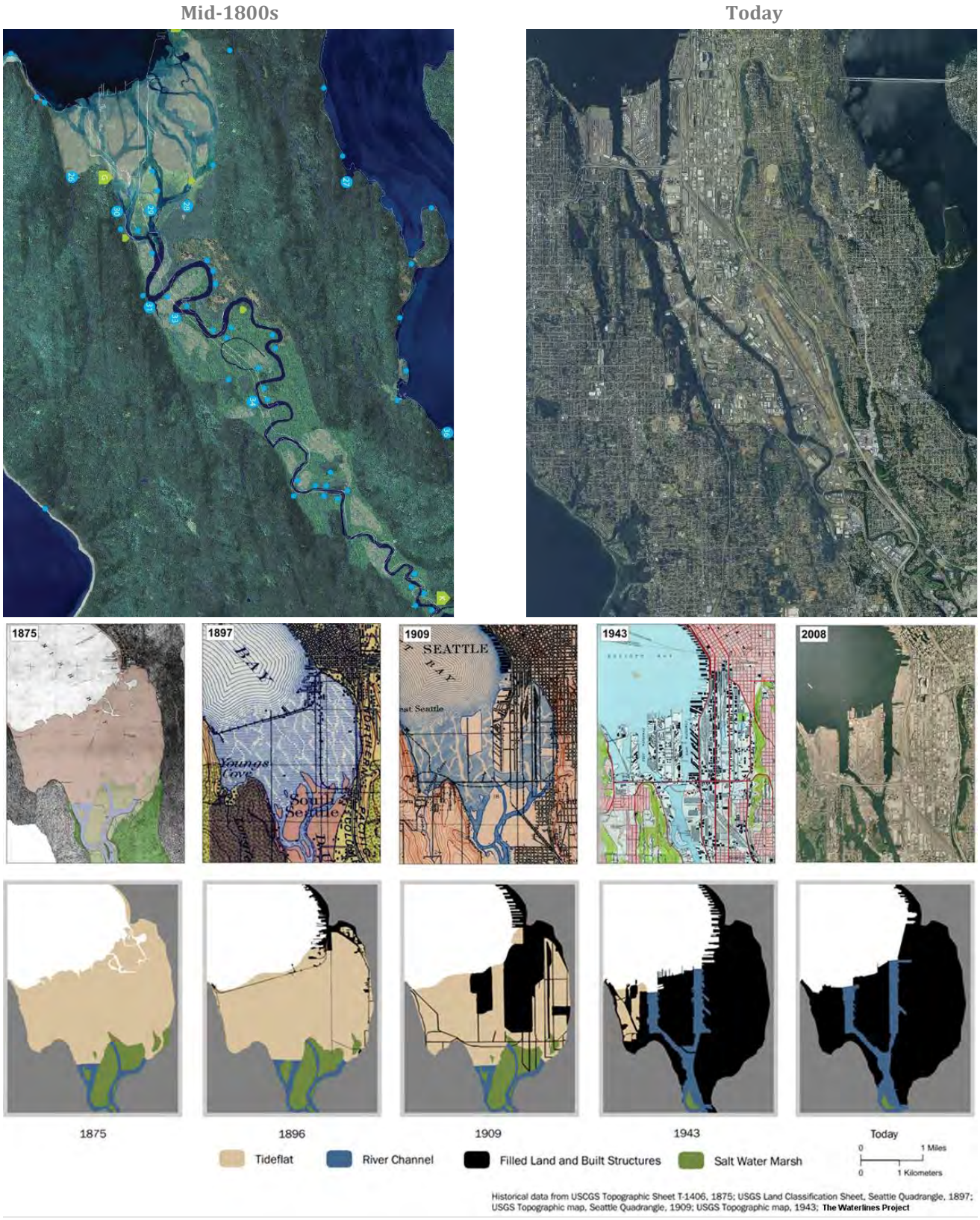
The Great Seattle Fire of 1889 prompted a vigorous period of rebuilding with more substantial, and fire-resistant materials like brick and stone. In an effort to create more buildable land for the expanding city, Seattle's city engineers began to regrade large chunks of land with hydraulic hoses. The Denny Hill regrade was one of the single largest efforts in reshaping Seattle's landscape, taking place between 1897 and 1930. Denny Hill originally topped out at about 220 feet in elevation, about half the height of hills such as Queen Anne, Capitol, and Magnolia; by the time regrading ended, the hill's high point had been lowered by more than 100 feet to create the mostly flat land now known as the Denny Regrade (**Exhibit 3.6-2**). Runoff and sediment from the Denny Regrade were primarily funneled west into Elliott Bay with some transported to the area around Pine and Olive Streets (creating the smoothed out, relatively gentle slope that now ascends past the Paramount Theater to Capitol Hill).

Exhibit 3.6-2. Denny Regrade Before and After, 1907-1909

Note: Regrade before and after, 2nd Avenue looking north from Pine Street, Seattle, 1907-1909
Sources: Courtesy Washington State Historical Society (1994.1.1.42) via HistoryLink.org Essay 21204.

Hundreds of acres of tide flats were filled in during the first decades of the 20th century to create dry land. After completion of the man-made Harbor Island in 1909, the mouth of the Duwamish River was divided into two channels. A subsequent series of major public works projects straightened and dredged the Duwamish riverbed, both to open the area to commercial use and to alleviate flooding. Beginning in 1913, the river was altered to remove oxbows and meanders to maintain high water flows and turning ships and by 1920, 4.5 miles of the Duwamish Waterway had been dredged to a depth of 50 feet, with 20 million cubic feet of mud and sand going into the expansion of Harbor Island. The shallow, meandering, 9-mile-long river became a 5-mile engineered waterway capable of handling ocean-going vessels and the Duwamish basin transitioned into Seattle's industrial and commercial core area. See **Exhibit 3.6-3**.

Exhibit 3.6-3. The Transformation of the Duwamish Estuary and River



Source: Burke Museum, The Waterlines Project, 2009.

Native villages on the Duwamish were completely supplanted by white settlement and commercial use through the massive alterations of the land and waterways, the destruction of wildlife and fish habitats it caused, and by the occupation of land. White settlers also deliberately removed native settlements as evidenced by burning of Indian longhouses in 1893. Duwamish people continued to work and fish in the area, using man-made "Ballast Island" on the Seattle waterfront as a canoe haul-out and informal market, but by the mid-1920s, most remnants of traditional life along the river had disappeared.

Racially Restrictive Covenants & Zoning Laws

Racially restrictive covenants came into popular use in Seattle after 1920. Covenants were used by property owners, subdivision developers, or realtors to bar the sale or rental of property to specified racial or ethnic groups. Property deeds in predominantly White neighborhoods or desirable areas of new housing development often explicitly stated that no Asian, Black, and Indian people shall be permitted to occupy the property. Seattle residential areas with restrictive covenants include but are not limited to Victory Heights, Queen Anne, Capitol Hill, Blue Ridge, and Hawthorne Hills. Such neighborhoods are located away from the city's industrial areas. By excluding all but White households from covenant-restricted residential areas, eligible locations for homes for Black, Asian, and Indigenous households were more likely to be in close proximity to industrial areas, such as Delridge, South Park, and South Beacon Hill (Honig, 2021; University of Washington, 2020).

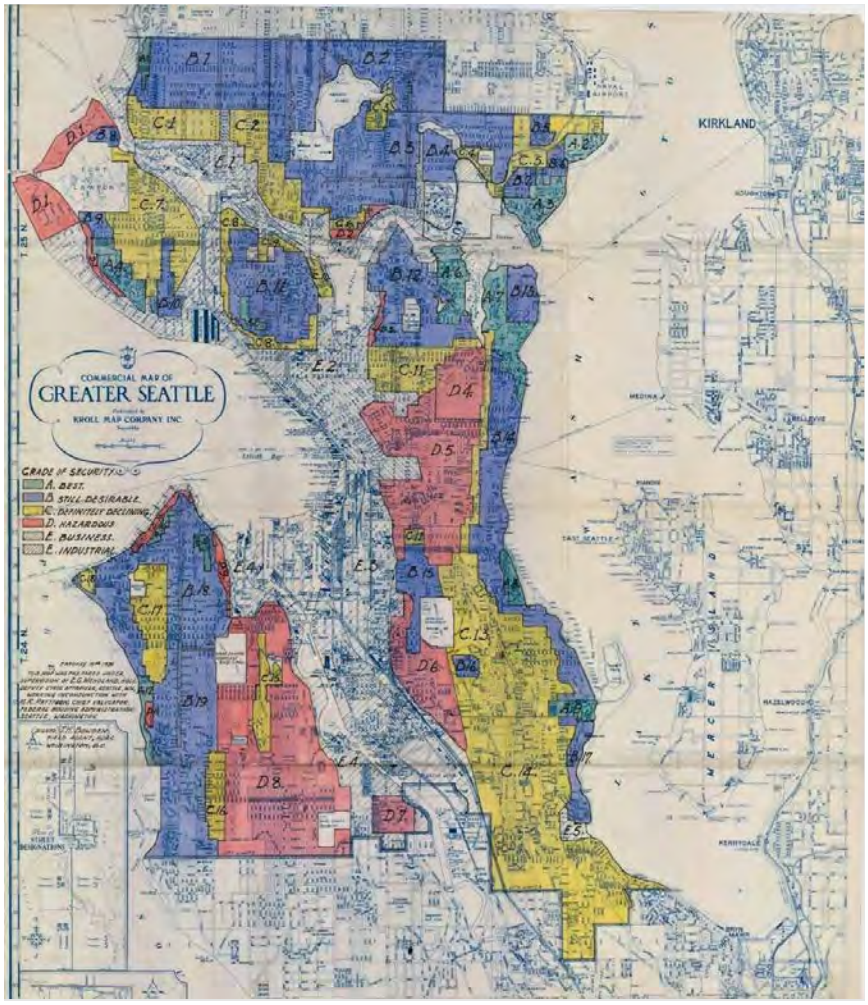
See also **Section 3.8 Population, Housing, & Employment** and the Seattle Municipal Archives (Redlining in Seattle) for more discussion of redlining and displacement.

In the late 1930s the practice of redlining was used to discriminate against racial minorities as the federal Home Owners' Loan Corporation (HOLC) evaluated mortgage risks in cities across the country. It rated neighborhoods as "best," "still desirable," "definitely declining," and "hazardous" (**Exhibit 3.6-4**). Neighborhoods with concentrations of Black, Asian, and Indian households were deemed financially risky and were marked in red so that mortgage lenders were discouraged from financing property there. The HOLC maps promoted racial inequality because it made mortgages difficult to obtain and expensive for minority households who sought to buy homes where they lived, preventing them from accumulating wealth. Additionally, lenders refused to provide mortgages for Black, Asian, and Indian households in predominantly White neighborhoods rated "best" or "still desirable." On the 1936 HOLC map of Seattle, neighborhoods adjacent to the Duwamish industrial areas including Delridge, South Park, and South Beacon Hill were rated "hazardous," while neighborhoods closely adjacent to the Ballard and Interbay industrial areas including the lower slopes of Magnolia, Queen Anne, and portions of Ballard were rated "definitely declining."

Prior to Seattle's first zoning ordinances, multifamily land uses were allowed broadly throughout the city, with no areas reserved exclusively for single-dwelling housing. Seattle's first ordinance was adopted in 1923, with a major update in 1956. Multi-family residential districts were located at the edges of rail lines, industrial districts, and manufacturing districts

as part of the 1956 update and caused environmental justice harms. These ordinances prevent new development in large areas of the city, particularly more affluent areas, and pushed multifamily to less desirable areas. The effect of this zoning was that Black, Asian, Indian, and relatively less affluent renters were exposed to noise and air quality and other impacts, while single family districts further from industrial areas were not. This pattern of multi-family housing and zoning districts bordering MICs continues to be evident today in areas including Interbay and the northeast edge of Ballard.

Exhibit 3.6-4. Commercial Map of Greater Seattle With "Grade Of Security" Designations, 1936



Source: Honig, 2021 (HistoryLink Essay No. 21296).

Annexation & Regional Transportation Corridors

Many of the City's early connections to the region and nation and resulting land use decisions were dependent on water access. This dependency shifted in the late 1800s with expansion of the roadway and rail network. Seattle's first electric streetcars opened in 1889 and by 1892, the city had 48 miles of electric streetcars and 22 miles of cable railway. In 1902, the Seattle-

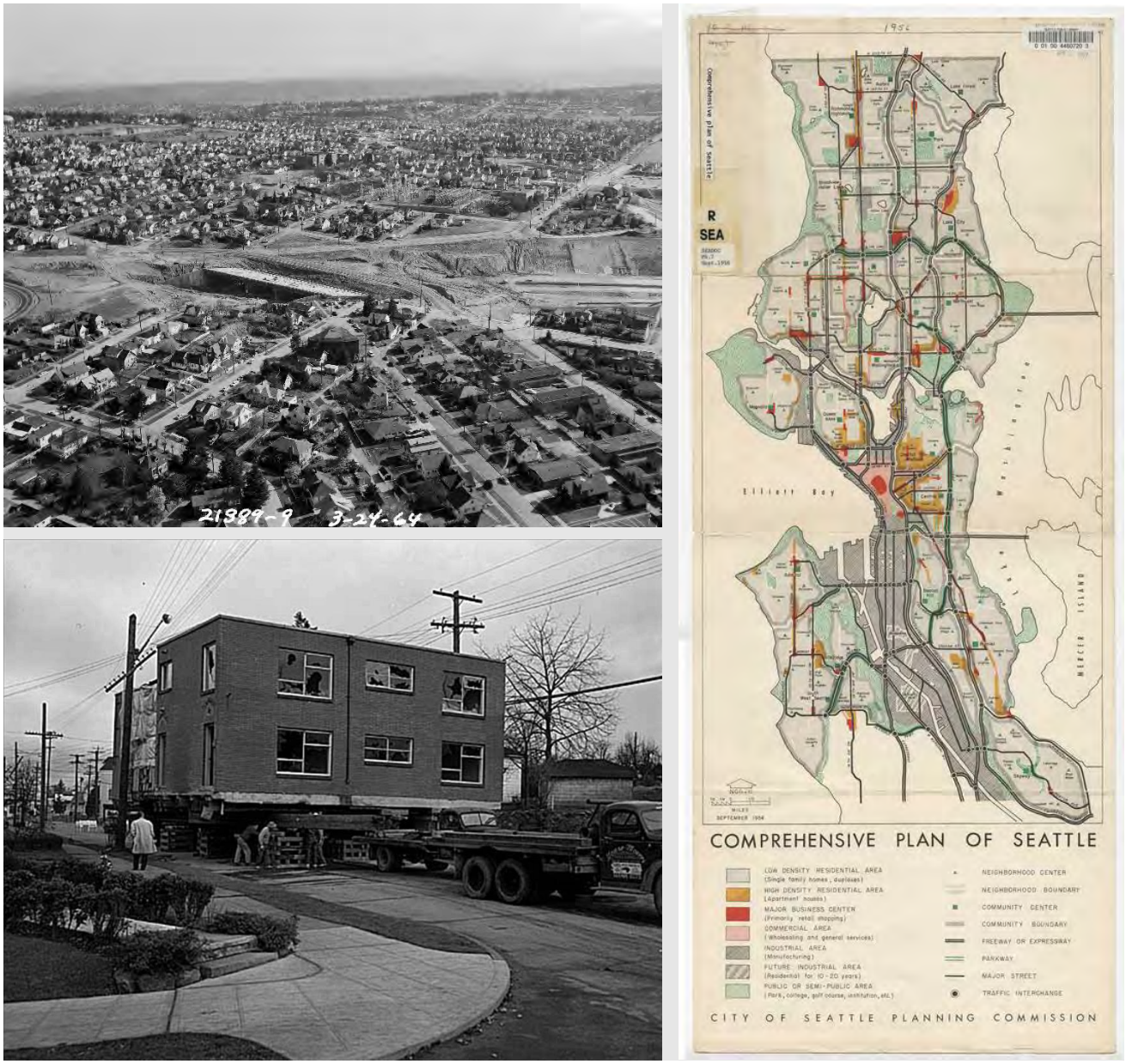
Tacoma Interurban Railway opened—which included stops in Rainier Beach, Renton, and Kent—and a Mount Vernon-to-Bellingham line opened by 1910. Street cars exposed new territory to speculative commercial and residential development and the city expanded through extensive annexation during the first part of the 20th century. As of 1891, the city extended from present-day Beacon Hill to the University District (then known as Brooklyn). Between 1905 and 1910, eight small towns (Ballard, Columbia, Georgetown, Laurelhurst, Rainier Beach, Ravenna, South Park, and West Seattle) were annexed to the City of Seattle, nearly doubling the physical area of the city. After Georgetown was annexed in 1910, no large annexations were made until the early 1950s. Much of the city north of N 85th Street was added during postwar annexation as major road networks accelerated the decentralization of the city.

Major transportation corridors constructed during the 20th century fundamentally changed Seattle's land use patterns and the neighborhoods bisected by them. These included the Pacific Highway built in the 1920s (later renamed US 99 and then SR 99 after construction of I-5), the George Washington Memorial Bridge (the Aurora Bridge) completed in 1932, the elevated Alaskan Way completed in 1936 and subsequent double-deck Alaskan Way Viaduct built in three phases from 1949 through 1959, and the Seattle Freeway (now I-5) constructed in the 1960s.

When the viaduct opened in 1953, it offered the first route around Seattle's congested central business district. The expressway relieved traffic on city streets, eased the movement of through traffic, and improved connections between growing southwest Seattle neighborhoods and downtown. Despite its utility, the viaduct was long viewed as a physical and visual barrier between downtown and the city's waterfront. Various groups and individuals argued and planned for its demise over several decades but the lack of a viable alternative for handling the tens of thousands of daily users stymied their efforts. The 2001 Nisqually earthquake significantly damaged the viaduct's joints and foundations and furthered the discussion. After a decade of studying, planning, and public discussion, the idea for a deep-bore tunnel garnered enough support to move forward. The southern end of the viaduct was demolished in October 2011 and tunnel boring took place from 2013-2017. The viaduct closed to traffic in January 2019, the new tunnel opened in February, and the remaining span of the viaduct was demolished later that year. New development along the waterfront in downtown Seattle—including a park promenade—are scheduled to be completed in 2025.

The Seattle Freeway, now known as I-5, also altered the landscape of Seattle's neighborhoods when it was constructed in the 1960s. Due to unique geographical and topographical constraints, the freeway's route was ultimately drawn directly through the center of the city, breaking east to avoid Green Lake and then bending west around Beacon Hill before continuing south (see **Exhibit 3.6-5**). Communities within or adjacent to the future construction path were sliced in half and severely impacted by the resulting displacement while communities on the western and eastern shores of the city remained intact. For example, eight square blocks of land demolished in the heart of the Chinese International District left the district divided and with an unpleasant edge condition for future redevelopment to contend with. In all, 20.5 miles of the route—or about 4,500 parcels of land (most of which were improved with homes, apartment buildings, or businesses)—were cleared for the construction.

Exhibit 3.6-5. I-5 Construction Through Seattle and the Planned Seattle Freeway System



Top left: Construction of I-5, 1964; Courtesy of the Seattle Municipal Archives. Bottom left: Apartment building being moved due to I-5 construction, 1960; HistoryLink Essay 4168 via MOHAI (1986.5.4007). Right: City of Seattle 1957 Comprehensive Plan; Seattle Public Libraries Special Collection.

Seattle's Freeway Revolt—one of a number of such uprisings across the U.S. in the 1960s and 70s—halted two other major freeways in the city and significantly downsized a third. Along with I-5, the City's Comprehensive Plan called for a parallel freeway on the Lake Washington side (the RH Thomson Expressway) that would have run from the Duwamish neighborhood in the south to Bothell in the north, and the Bay Freeway that would have connected Seattle Center to I-5 with a highway via a massive viaduct that cut through South Lake Union (see **Exhibit 3.6-5**). If built as planned, the RH Thompson Expressway would have cut through the

heart of the largely Black Central District Neighborhood, demolished as many as 3,000 homes, and displaced up to 8,000 people. The planned 14-lane interchange with I-90 alone (via an open trench on Mount Baker Ridge) would have displaced an estimated 4,000 residents and many businesses (as opposed to the existing tunnels that currently connect I-90 to I-5). A diverse consortium of activists faced the Seattle City Council and Highway Department head on to stop both of the planned freeways, which were eventually removed from the City's Comprehensive Plan in the 1970s and struck down by public referendum.

Century 21: the Seattle World's Fair and post-Exposition Civic Center

The Century 21 Exposition, also known as the Seattle World's Fair, was held between April 21 and October 21, 1962, and drew almost 10 million visitors. The 1962 Seattle World's Fair gave visitors a glimpse of the future and left Seattle with a lasting legacy, giving Seattle world-wide recognition and effectively "putting it on the map." Though the fair was primarily administered by the non-profit private Century 21 Exposition, Inc., substantial efforts were made to integrate the planning of the municipal, state, and private entities involved. In addition, the City of Seattle was deeply involved in development and execution. The City oversaw a number of fair-based building projects both within and beyond the fairgrounds, including the Monorail line, the International Fountain, and a 1,500-car garage along Mercer Street. Ultimately, the fair left the city a permanent legacy in the Seattle Center and its complex of performance, sports, and entertainment halls, as well as the Pacific Science Center, the Monorail, and the Space Needle.

The Modern Comprehensive Plan: Land Use Policies & Implementation

In 1957, Seattle adopted it first Comprehensive Plan "in principle" presented in the form of an illustrated map (see **Exhibit 3.6-5**). The Plan focused primarily on transportation, specifically the automobile, and protecting single-family homes. Per the adopting resolution, the Plan addressed "the most appropriate use of land, lessening traffic congestion and accidents, making provision for adequate light and air, avoiding undue concentration of population, promoting a coordinated development of vacant areas, encouraging the formation of neighborhood and community units, and the conservation and restoration of natural resources (Resolution 17488)." Various amendments were made to the 1957 Comprehensive Plan until 1978 when the City started relying instead on land use policies. The last major revision was made in 1965 and the City stopped issuing its own comprehensive plan in 1978, relying instead on land use policies, until the State adopted the 1990 Growth Management Act (GMA). Those land use policies drove a significant review of the City's land use regulations, resulting in the adoption of new zoning policies and regulations that supported mixed-use development through the 1980s.

The GMA was adopted in 1990 to address concerns about the impacts of uncoordinated growth on Washington communities and the environment and provides a framework for land use planning and development regulations in the state. As part of the GMA, most cities and counties in Washington (including Seattle) are required to adopt

See also **Section 3.8 Population, Housing, & Employment.**

comprehensive plans coordinated with regional and countywide planning. In 1994, the City adopted its first GMA mandated comprehensive plan developed around an "urban village strategy." This strategy focuses growth in walkable, mixed-use neighborhoods with good access to jobs, transit, and services. The City Council also adopted 37 neighborhood plans during the 1990s as part of this planning effort in response to concerns regarding the impact of the urban village strategy on neighborhoods.

The Comprehensive Plan and many neighborhood plans have been revised since the 1990s, but the City's overall urban village growth strategy has remained consistent. Growth has largely adhered to the plan with 83% of new homes built in urban centers or villages over the last 10 years (half of all housing was built in Downtown, South Lake Union, First Hill, and Capitol Hill). Substantial public and private investments have further supported the growth strategy in several villages, including Sound Transit's expansion of the light rail system and bio-tech sector growth in South Lake Union. Overall, the urban village strategy has guided residential, office, and retail development into a small number of compact, walkable, mixed-use neighborhoods linked by transit.

At the same time, the city's growth has led many neighborhoods to become increasingly exclusive and has contributed to a dearth of affordable housing for its working population, while endemic issues of racism, social injustice, and a warming planet continue to inspire demands for change. Many neighborhoods outside urban center and village boundaries have few housing options beyond detached homes. With the cost of these homes rising dramatically in the last 10 years, these neighborhoods are out of reach for most people who don't already own a home. The urban village strategy has also resulted in few new homeownership opportunities inside centers and villages since it focuses development in areas zoned primarily for apartments and retail.

Current Policy & Regulatory Frameworks

This section describes the future land use and zoning framework (including overlay districts), policies and regulations regarding urban form and aesthetics (height, bulk, and scale, transitions, tree canopy, shadows, and views), and current land use conditions. Current policy and regulatory framework regulating land use in the City of Seattle flows from the GMA, the PSRC's VISION 2050 and MPPs, King County's CPPs, the City's current Comprehensive Plan, and implementation actions including development standards in the Seattle Municipal Code (SMC) and the Shoreline Master Program (SMP). Several other regulatory measures affect land use including localized overlay districts and design guidelines. Most state, regional, and local land use policies are reviewed and evaluated in **Section 3.7 Relationship to Plans, Policies, & Regulations** with policies and regulations specific to urban form and aesthetics discussed below.

Future Land Use & Zoning

The City of Seattle's Future Land Use Map (FLUM) is part of the Comprehensive Plan and expresses spatially the 20-year vision of preferred land use patterns to guide development within the city. Four land use area types implement the urban village strategy—urban centers, hub urban villages, residential urban villages, and manufacturing/industrial centers (MICs). Four other land use types—neighborhood residential areas, multi-family residential areas, commercial/mixed-use areas, and industrial areas—are meant to suggest specific uses outside of the urban villages. The FLUM also designates major institutions, cemeteries, and city-owned open space.

The future land use designations are implemented by a corresponding range of zoning districts and development regulations established in Title 23 of the Seattle Municipal Code (SMC). There may be different levels of zoning within each land use area that provide more detail about what can be built. Zoning overlays also exist in certain locations, such as around major institution overlay districts and in master planned communities. Property located within an overlay district is subject both to its zone classification regulations and to additional requirements imposed for the overlay district. The overlay district provisions apply if they conflict with the provisions of the underlying zone. **Exhibit 3.6-6** summarizes future land use designations and corresponding implementing zones. See also **Appendix G.1** for a summary of general zoning categories and overlay districts detailed in SMC Title 23.

Exhibit 3.6-6. Existing Future Land Use Designations and Typical Implementing Zones

Future Land Use Designation	Typical Implementing Zones[1]
Urban Centers[2] Urban centers are the densest Seattle neighborhoods. They act as both regional centers and local neighborhoods that offer a diverse mix of uses, housing, and employment opportunities.	▪ Downtown (DH1, DH2, DMC, DMR, DOC1, DOC2, and DRC) ▪ Pike Market Mixed (PMM), Pioneer Square Mixed (PSM), and International District Mixed and Residential (IDM and IDR) ▪ Seattle Mixed (SM) ▪ Lowrise, Midrise, and Highrise Multifamily (LR3, MR, and HR) ▪ Neighborhood Commercial (NC2, and NC3) ▪ Commercial (C1 and C2)
Hub Urban Villages[2] Hub villages are communities that offer a balance of housing and employment but are generally less dense than urban centers. These areas provide a mix of goods, services, and employment for their residents and surrounding neighborhoods.	▪ Residential Small Lot (RSL) ▪ Lowrise Multifamily (LR1, LR2, and LR3) ▪ Midrise Multifamily (MR) ▪ Neighborhood Commercial (NC1, NC2, and NC3) ▪ Commercial (C1 and C2)
Residential Urban Villages[2] Residential villages are areas of residential development, generally at lower densities than urban centers or hub urban villages. While they are also sources of goods and services for residents and surrounding communities, for the most part they do not offer many employment opportunities.	▪ Residential Small Lot (RSL) ▪ Lowrise Multifamily (LR1, LR2, and LR3) ▪ Midrise Multifamily (MR) ▪ Neighborhood Commercial (NC1, NC2, and NC3)

Future Land Use Designation	Typical Implementing Zones[1]
Manufacturing Industrial Centers (MICs) Manufacturing industrial centers are home to the city's thriving industrial businesses. Like urban centers, they are important regional resources for retaining and attracting jobs and for maintaining a diversified economy. Most of the city's shipping, manufacturing, and freight-distribution activities take place in the city's two manufacturing/industrial centers.	▪ Industrial (MML, II, UI, IC)
Neighborhood Residential Areas Neighborhood residential areas provide opportunities for detached single-family and other compatible housing options that have low height, bulk, and scale in order to serve a broad array of households and incomes and to maintain an intensity of development that is appropriate for areas with limited access to services, infrastructure constraints, fragile environmental conditions, or that are otherwise not conducive to more intensive development.	▪ Neighborhood Residential (NR1, NR2, and NR3)
Multi-Family Residential Areas The city's multi-family areas contain a variety of housing types. You might find duplexes or townhouses, walk-up apartments, or highrise towers. Overall, these areas offer more choices for people with different living styles and a wider range of incomes than single-family zones.	▪ Lowrise Multifamily (LR1, LR2, and LR3) ▪ Midrise Multifamily (MR)
Commercial / Mixed Use Areas Commercial/mixed-use areas are places meant to provide jobs and services. Most of these areas also allow housing.	▪ Neighborhood Commercial (NC1, NC2, and NC3) ▪ Commercial (C1 and C2)
Industrial Areas In limited industrial areas outside the two MICs, City zoning rules allow industrial activity such as manufacturing, warehousing, and shipping of goods through waterways, railways, and highways.	▪ Industrial (MML, II, UI, IC)
Major Institutions	▪ Major Institution Overlay District. Underlying zoning varies depending on the surrounding community.
Cemetery	▪ Neighborhood Residential (NR2 and NR3) ▪ Lowrise Multifamily (LR3)
City-Owned Open Space	▪ Neighborhood Residential (NR1, NR2, and NR3)

1 See **Appendix G.1** for more detailed summaries of general zoning categories and overlay districts, respectively.
2 See **Exhibit 2.1-1** in **Chapter 2** for a cross-walk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~A~~lternatives ~~2-5~~.
Sources: City of Seattle Future Land Use Map, 2022; BERK, 2023.

Shoreline Master Program

The Washington State Shoreline Management Act (SMA) requires all counties and most towns and cities to plan for how shorelines in their jurisdiction will develop through a Shoreline Master Program (SMP). Seattle's SMP applies to the shorelines and all waters of the state, as document in the City's Official Land Use Map (SMC 23.32). The Shoreline District includes all land within 200 feet of the city's major water bodies—Puget Sound, Lake Washington, Lake Union, the Lake Washington Ship Canal, and the Duwamish River—as well as hydrologically connected wetlands and all submerged land. The adopted Seattle SMP is comprised of the goals and policies in the Shoreline Areas Element of the Comprehensive Plan, SMP regulations in the Land Use Code (SMC 23.60A), maps of the locations of shoreline environments, and the Shoreline Restoration and Enhancement Plan.

The SMP must address a wide range of physical conditions and development settings along areas of the shoreline. Seattle's SMP prescribes different environmental protection measures, allowable use provisions, development standards, and other policy and regulatory measures based on the environmental designation of each area in the Shoreline District. Shoreline environment designations within Seattle's Shoreline District are divided into two broad categories—Conservancy and Urban—and then subdivided further within these two categories. The conservancy shoreline environments are less developed and provide for areas of navigation, recreation, and habitat protection. The urban shoreline environments are areas that are more developed and provide for single-family houses and water-dependent and water-related uses. SMC 23.60A.220(D) details the purpose and locational criteria of each environment designation.

Urban Form

Height, Bulk, & Scale

Development regulations govern what uses are permitted, as well as the physical form (such as heights and setbacks) of development, which influences urban character. Policies guiding height, bulk, and scale in the Land Use Element of the Comprehensive Plan include:

> ***LU 5.3*** *Control the massing of structures to make them compatible with the area's planned scale, provide a reasonable ratio of open to occupied space on a site, and allow the building to receive adequate natural light.*
>
> ***LU 5.4*** *Use maximum height limits to maintain the desired scale relationship between new structures, existing development, and the street environment; address varied topographic conditions; and limit public view blockage. In certain Downtown zones and in industrial zones, heights for certain types of development uniquely suited to those zones may be unlimited.*
>
> ***LU 5.5*** *Provide for residents' recreational needs on development sites by establishing standards for private or shared amenity areas such as rooftop decks, balconies, ground-level open spaces, or enclosed spaces.*

> ***LU 5.6*** *Establish setbacks in residential areas as needed to allow for adequate light, air, and ground-level open space; help provide privacy; promote compatibility with the existing development pattern; and separate residential uses from more intensive uses.*

These policies are reiterated in SMC 25.05.675.G Specific Environmental Policies – Height, bulk, and scale, which set environmental review policies to provide for "smooth transition between industrial, commercial, and residential areas, to preserve the character of individual City neighborhoods, and to reinforce natural topography by controlling the height, bulk, and scale of development." Specifically, SMC 25.05.675.G.2 includes height, bulk, positioning, design, and other mitigation techniques and states the following intent:

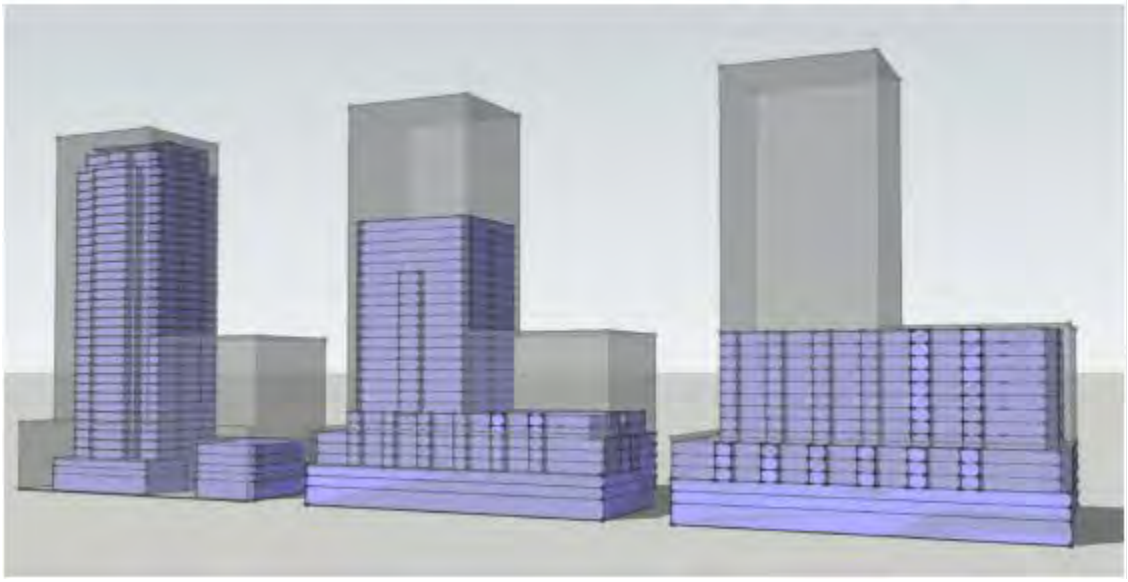
> *It is the City's policy that the height, bulk, and scale of development projects should be reasonably compatible with the general character of development anticipated by the goals and policies set forth in the Land Use Element, Growth Strategy Element, and Shoreline Element of the Seattle Comprehensive Plan; the procedures and locational criteria for shoreline environment redesignations set forth in Sections 23.60A.060 and 23.60A.220; and the adopted land use regulations for the area in which they are located, and to provide for a reasonable transition between areas of less intensive zoning and more intensive zoning.*

The height, bulk, scale, and character of development vary considerably across Seattle. Seattle's zoning regulations include limits on building height, as well as other characteristics, including density, floor area ratio (FAR), minimum setbacks, and maximum lot coverage. All of these qualities contribute to the overall intensity of development at any given location. Building height and FAR limits are two of the most important code elements that directly influence how intense a development feels in a given location. FAR is the ratio of a building's floor area to the size of the lot where it is located. For most zoning districts, the City of Seattle has established both a maximum allowed height and a maximum allowed FAR. The relationship between building height and FAR can be viewed as a shorthand for assessing the "bulkiness" of building. For example, a tall building with a low FAR will take up a smaller proportion of its building site than a relatively short building with a higher FAR (see **Exhibit 3.6-7** and **Exhibit 3.6-8**).

Exhibit 3.6-7. Zoning Envelopes and Floor Area Ratios

Gray: *hypothetical "zoning envelopes" established by setbacks, height limits, tower floorplate limits, minimum tower separation and other development standards.*

Blue: *possible building configurations within the allowed zoning envelope, limited by a floor area ratio (FAR) of 12. All three buildings have the same amount of floor area but they configure the space differently.*



Note: A floor plate is the horizontal plane of the floor of a building, measured to the inside surface of exterior walls. Floor area ratio is the ratio of the total square feet of a building to the total square feet of the property on which it is located. Building floor area / Lot size = Floor Area Ratio
Source: City of Seattle, 2013.

Exhibit 3.6-8. Understanding Floor Area Ratios and Lot Coverage

Source: City of Seattle, 2019.

In neighborhood residential zones, Seattle limits FAR to (SMC 23.44.011.B):

1. *The FAR limit on lots developed with a single-family dwelling unit as the principal use in NR1, NR2, and NR3 zones, is 0.5, except that lots with less than 5,000 square feet of lot area can include up to 2,500 square feet of total chargeable floor area. The applicable FAR limit applies to the total chargeable floor area of all structures on the lot.*
2. *The FAR limit in RSL zones is 0.75. The applicable FAR limit applies to the total chargeable floor area of all structures on the lot.*

Transitions

The Growth Strategy Element of the Comprehensive Plan includes the following policy on urban design transitions:

> ***GS 3.11*** *Use zoning tools and natural features to ease the transitions from the building intensities of urban villages and commercial arterials to lower-density developments of surrounding areas.*

Other elements of the Comprehensive Plan also mention the importance of smooth transitions around urban villages and industrial areas. Smooth transitions are also mentioned in SMC 25.05.675.G Specific Environmental Policies (see **Height, Bulk, & Scale** above).

While transitions are achieved primarily through decisions about where different zones are applied, there are also some existing development code regulations that are intended to limit the impacts of zone transitions, including regulations regarding setbacks and upper-story step backs and appurtenances and nuisances. These are described in more detail below.

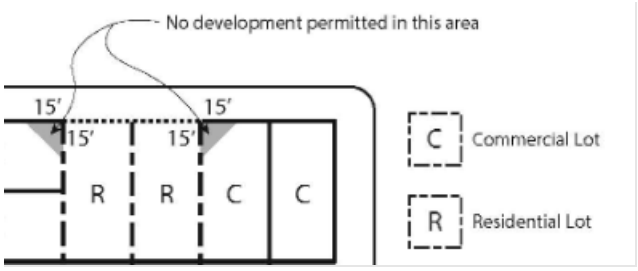
Setbacks & Upper-Story Setbacks (by Zone)

Multifamily zones. SMC 23.45.518 regulates setbacks in multifamily zones and requires a 12-foot setback required for all portions of development in the lowrise zones above 34 feet that abut a neighborhood residential zone. For religious organizations building affordable housing, SMC 23.45.550 establishes FAR and height bonuses and requires a 10-foot setback on sites adjacent to neighborhood residential zones.

Commercial zones. SMC 23.47A.014 regulates setbacks in commercial zones, with the following provisions:

- Required corner setbacks of 15 feet, but not side setbacks, in commercial zones where they abut residentially zoned parcels. See **Exhibit 3.6-9**.

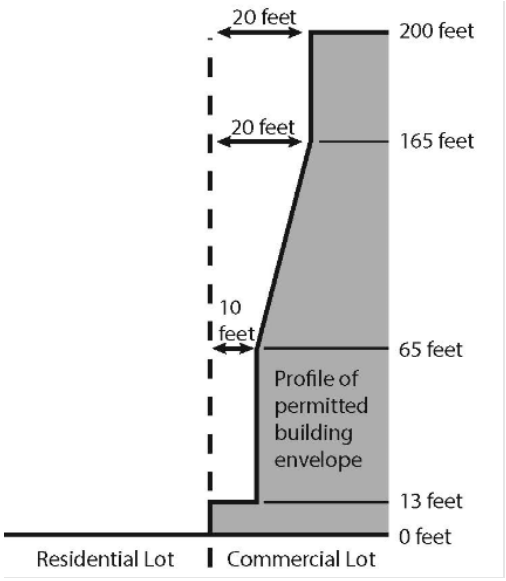
Exhibit 3.6-9. Corner Setbacks Required in Residential/Commercial Transitions



Source: Seattle Municipal Code Exhibit A for 23.47A.014.

- Required 10-foot setbacks for all portions of development above 13 feet, up to 65 feet, on parcels abutting residential or commercially zoned lots. Above 65 feet, an additional one-foot setback is required for each additional 10 feet of height to 165 feet, at which point no further setbacks are required. See **Exhibit 3.6-10**.

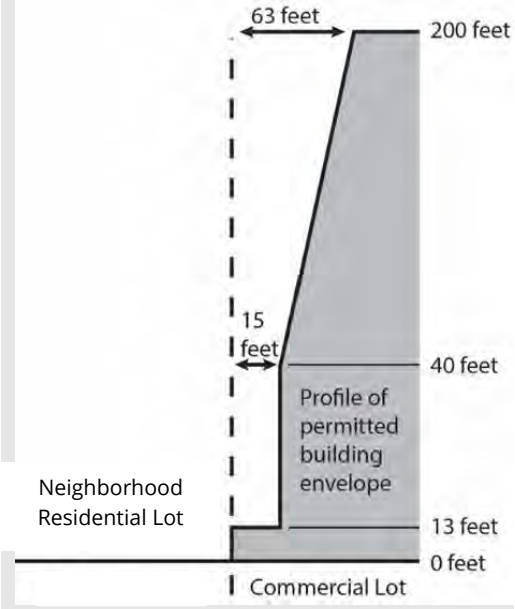
Exhibit 3.6-10. Upper Setbacks Required on Commercial Lots



Source: Seattle Municipal Code Exhibit B for 23.47A.014.

- Required 15-foot setbacks for all portions of development above 13 feet, up to 40 feet, on parcels abutting lots zoned neighborhood residential. Above 40 feet, an additional 3-foot setback is required for each additional 10 feet of height. See **Exhibit 3.6-11**.

Exhibit 3.6-11. Upper Setbacks Required: Commercial Adjacent to Neighborhood Residential



Note: Upper setbacks required on commercial lots adjacent to neighborhood residential lots
Source: Seattle Municipal Code Exhibit C for 23.47A.014.

Appurtenances & Nuisances

SMC 23.45.570 ensures that institutions located in Lowrise (LR) zones do not site noisy or visually harsh infrastructure like HVAC units, game courts, or kitchen ventilation within 20 feet from properties zoned neighborhood residential. In commercial zones, street-level use restrictions, setbacks, conditional use restrictions, and/or landscape screening requirements apply to specific uses or site elements like warehouses, drive-throughs, dumpsters, and drinking establishments near residential zones.

Tree Canopy

See **Section 3.3 Plants & Animals** for information about existing regulations and tree canopy patterns.

Tree protection. Seattle's tree code protects existing trees through rules established in Seattle Municipal Code 25.11.

Street trees. In most zones, Seattle also requires existing street trees to be retained unless the Director of SDOT approves their removal and for street trees to be planted with redevelopment, with some exceptions (SMC 23.45.524.B). Green Factor requirements are also required to be met for most new development in multi-family and commercial zones.

In the 130th/145th Station Area, street designations, which set standards for street tree planting areas, for key streets include:

- NE 130th St (east of Roosevelt Way NE): Neighborhood Yield Street—5-8-foot green stormwater infrastructure landscape strip

- Roosevelt Way NE, 15th Ave NE, NE 125th St, and NE 145th St: Urban Center Connector, Principal Arterial—6-12-foot landscape/furniture zone

Maximum lot coverage regulations are relevant to tree canopy because they have limited building mass in Seattle's lowest density zones for decades, leaving more space for vegetation. **Exhibit 3.6-12** lists maximum lot coverage limitations in Seattle's neighborhood residential zones.

Exhibit 3.6-12. Neighborhood Residential Maximum Lot Coverage

Zone	Lot Size	Maximum Lot Coverage
NR1, NR2, and NR3	Less than 5,000 square feet	1,000 square feet plus 15 percent of lot area
	5,000 square feet or more	35 percent of lot area
RSL	All lots	50 percent of lot area

Source: SMC 23.44.010.

Shadows

Seattle's environmental policies address shadows on public open spaces. Specific environmental policies – Shadows on Open Spaces (SMC 25.05.675.Q.2) states:

> *It is the City's policy to minimize or prevent light blockage and the creation of shadows on open spaces most used by the public.*
>
> *a. Areas outside of downtown to be protected are as follows:*
> *1) Publicly owned parks;*
> *2) Public schoolyards;*
> *3) Private schools which allow public use of schoolyards during non-school hours; and*
> *4) Publicly owned street ends in shoreline areas.*
>
> *b. Areas in downtown where shadow impacts may be mitigated are:*
> *1) Freeway Park;*
> *2) Westlake Park and Plaza;*
> *3) Market (Steinbrueck) Park;*
> *4) Convention Center Park; and*
> *5) Kobe Terrace Park and the publicly owned portions of the International District Community Garden.*

However, the policies also include, "due to the scale of development permitted in downtown, it is not practical to prevent such blockage at all public open spaces downtown" and "it is impractical to protect private properties from shadows through project-specific review" (SMC 25.05.675.Q.1).

Views

The Comprehensive Plan and Land Use Code establish policies and regulations for the protection of public views of important landmarks and natural features, as well as views from

specific designated viewpoints within the city and scenic qualities along mapped scenic routes. The Land Use Element of the Comprehensive Plan establishes the importance of public view preservation:

> ***LU 5.15*** *Address view protection through*
> - *zoning that considers views, with special emphasis on shoreline views;*
> - *development standards that help to reduce impacts on views, including height, bulk, scale, and view corridor provisions, as well as design review guidelines; and*
> - *environmental policies that protect specified public views, including views of mountains, major bodies of water, designated landmarks, and the Downtown skyline.*

The Land Use Element contains policies to regulate alteration and use of the shorelines in the City to provide substantial public access through visual or physical means and to promote interest and preservation of the physical and aesthetic qualities of the shorelines of the city. The Land Use Element also encourages the protection of views through policies related to building height limits and minimization of building bulk.

The Comprehensive Plan lists the following as important landmarks for public views:

- Downtown skyline
- Major bodies of water
- Shoreline areas
- Elliott Bay
- West Seattle
- Mount Rainier
- Olympic Mountains
- Space Needle
- Puget Sound
- Lake Washington
- Lake Union
- Portage Bay

SMC 25.05.675.P establishes environmental review policies for public view protection, specifically:

> *It is the City's policy to protect public views of significant* ***natural and human-made features****: Mount Rainier, the Olympic and Cascade Mountains, the downtown skyline, and major bodies of water including Puget Sound, Lake Washington, Lake Union and the Ship Canal, from public places consisting of... [a lengthy list of] specified viewpoints, parks, scenic routes, and view corridors....*
>
> *It is the City's policy to protect public views of* ***historic landmarks*** *designated by the Landmarks Preservation Board that, because of their prominence of location or contrasts of siting, age, or scale, are easily identifiable visual features of their neighborhood or the City and contribute to the distinctive quality or identity of their neighborhood or the City.*

Additional policies protect views of the Space Needle (25.05.675.P.2.c) from:

- Alki Beach Park (Duwamish Head)
- Bhy Kracke Park
- Gasworks Park
- Hamilton View Point
- Kerry Park
- Myrtle Edwards Park
- Olympic Sculpture Park
- Seacrest Park
- Seattle Center
- Volunteer Park

In Downtown, there are also view corridors to be protected through upper-level building setbacks in future development along the following streets (SMC 23.49.024):

- Broad, Clay, Vine, Wall, Battery, and Bell Streets west of First Avenue; and
- University, Seneca, Spring, Madison, and Marion Streets west of Third Avenue.

While the Comprehensive Plan and the Seattle Municipal Code establish the importance of view corridors and view preservation, in many cases the precise requirements for individual development projects are not strictly defined in the development regulations and protection of public views is deferred to consideration during project reviews and the design review process.

Major Land Use Policy Changes Recently Adopted or Currently Under Consideration

Seattle Transportation Plan Update & EIS

The City of Seattle ~~is currently~~ updated~~ing~~ its long-term vision for the future of transportation in Seattle. The Seattle Transportation Plan (STP) and associated EIS address mobility, access, and public space needs in a single document as a unified system. This effort ~~will~~ incorporated several city initiatives like Seattle's Vision Zero, the Race and Social Justice Initiative, the Climate Action Plan, the Transportation Electrification Blueprint, and others. Additionally, it ~~will~~ references plans created by other regional transportation agencies.

Seattle Parks & Open Space Plan Update

The City of Seattle's Parks and Open Space Plan (POS) was recently updated in 2024~~adopted in 2017 and is updated every 6 years, with the next major update planned for 2024~~. It provides an inventory of existing parks and open space, objectives for future actions, demand and need analysis including demographic and recreation trends, and recommended capital projects.

Design Review

The City is currently updating its Design Review Program to be consistent with HB 1293. HB 1293 requires that all design standards must be clear and objective and that there be a maximum of one public meeting. In addition to limiting projects to only one public meeting, proposed amendments would streamline the process to be quicker and less costly for applicants. Per HB 1293, the required revisions must be adopted by City Council within six months after the Comprehensive Plan is updated.

Current Conditions

Citywide

Future Land Use & Zoning

Land area in the City of Seattle encompasses approximately 83.83 square miles (53,651 acres).[22] The largest future land use designation category in the city is neighborhood residential, accounting for 52% of the city. Another one-quarter of the city is designated as a center or village (28%) with 6% in urban centers, 3% in hub urban villages, 8% in residential urban villages, and 11% in MICs. Of the remaining quarter of the city, 10% is designated as city-owned open space, 5% is designated as multi-family residential, 3% is designated as commercial/mixed-use, 1% is designated as major institution, and land designated as cemeteries or industrial areas outside the MICs account for less than 1% each. See **Exhibit 3.6-14** and **Appendix G.1**.

There are currently six urban centers, six hub urban villages, 18 residential urban villages, and two manufacturing industrial centers (MICs) in the city. The six urban centers (Downtown, Uptown, South Lake Union, First Hill/Capitol Hill, University Community, and Northgate) and two MICs (Greater Duwamish MIC and Ballard–Interbay–Northend MIC (BINMIC)) are also designated PSRC Metro Regional Growth Centers (RGCs) and Employment MICs, respectively. These regionally designated centers are part of the regional growth strategy in VISION 2050 to focus growth in urban areas with access to transit. The six RGCs meet PSRC's existing activity unit threshold for Metro RGCs (see the text box on the following page for additional information about PSRC versus King County RGC requirements).

[22] OFM Estimates of April 1 Population Density and Land Area by City and Town, 2022.

Section 3 of PSRC's 2018 Regional Centers Framework Update includes designation criteria for Metro RGCs. Among other criteria, this includes a minimum density of 30 existing activity units and 85 planned activity units. Metro RGCs are also expected to be between 320–640 acres in size (or larger if served by an internal, high-capacity transit system). Urban RGCs must meet a minimum density of 18 existing activity units and 45 planned activity units and the same size thresholds.

Appendix 6 of the King County Countywide Planning Policies (CPPs) includes designation criteria for countywide growth centers although none are currently designated in King County. The criteria include an existing density of at least 18 activity units and planned density of at least 30 activity units. Countywide growth centers are also expected to be between 160–500 acres in size. Appendix 6 also includes designation criteria for Metro and Urban Growth Centers that are higher than PSRC's current requirements (60 existing/120 planned for Metro and 30 existing/60 planned for Urban). Per the CPPs, not meeting existing activity unit thresholds for existing centers (all of Seattle's existing Urban Centers) is not grounds for de-designation or re-designation by the Growth Management Planning Council.

See also **Section 3.7 Relationship to Plans, Policies, & Regulations** for more discussion of PSRC Metro Regional Growth Centers and King County Countywide Centers.

Countywide Planning Policies were amended in 2021 to allow for designation of countywide centers based partially on size and activity levels. The City has not formally proposed countywide centers but may do so with the Comprehensive Plan Update. Thus, the size and activity units for both regional and countywide level centers are described below. Existing acreage and activity units per acre in each center and village are listed in **Exhibit 3.6-13.** Locations where the acreage or densities fall outside King County's countywide center designation criteria of 160–500 acres or below the minimum existing 18 activity units per acre are highlighted. All existing urban villages except the South Park Residential Urban Village in Area 7 meet the King County threshold of 18 existing activity units per acre. Several urban villages are below the minimum size threshold of 160 acres (the Lake City Hub Urban Village and the Admiral, Green Lake, Greenwood–Phinney Ridge, Madison–Miller, Morgan Junction, and Upper Queen Anne residential urban villages) and one is above the maximum size threshold of 500 acres (the 23rd & Union Jackson Residential Urban Villages). Note that PSRC's MIC designation criteria do not include an activity unit density threshold and so existing activity units per acre are not calculated for the two MICs.

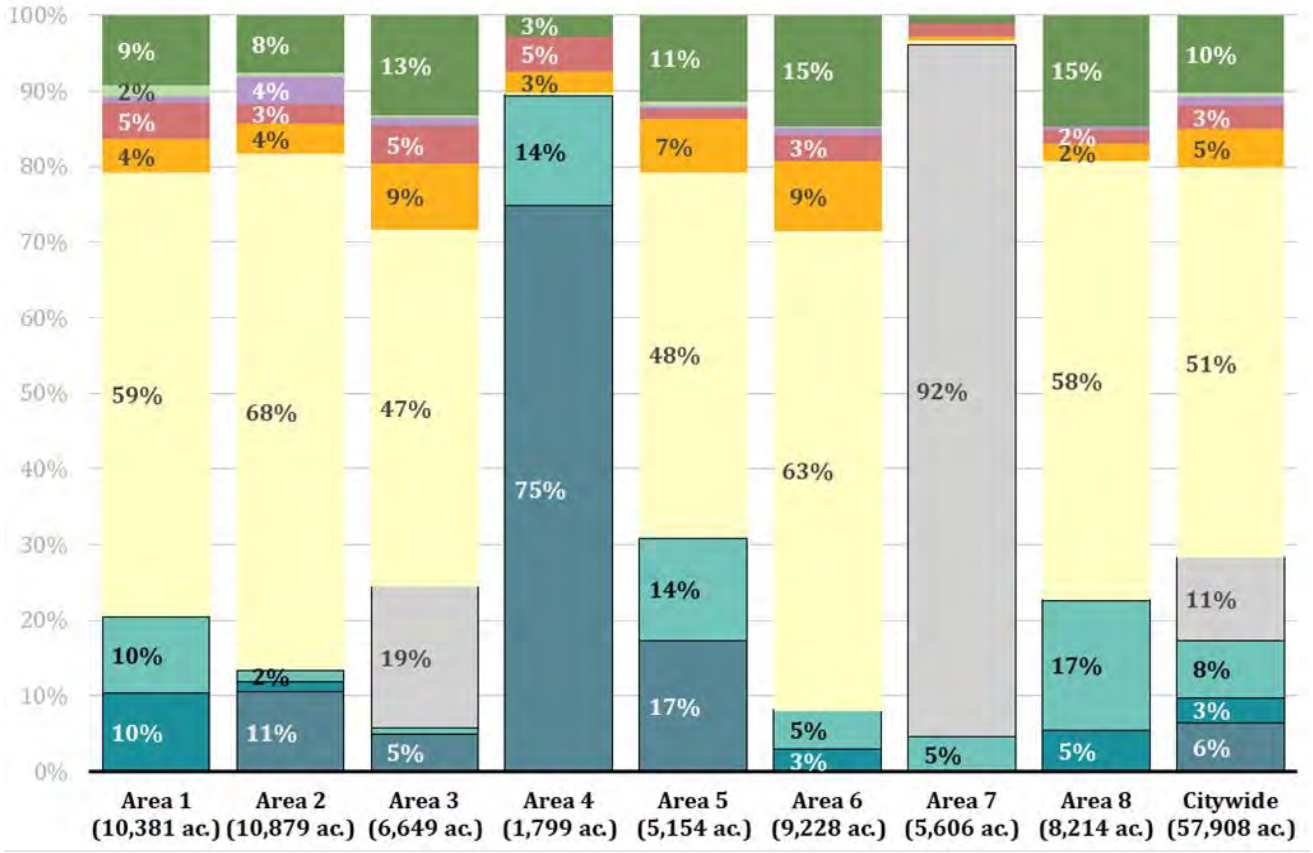
Adopted aggregate Future Land Use designations in Seattle are mapped in **Exhibit 3.6-15**. Outside of centers and villages, commercial, mixed-use, and multi-family designations generally follow main arterials such as Holman Rd NW/15th Ave NW/15th Ave W, SR 99, Greenwood/Phinney Ave N, 15th Ave NE, Lake City Way NE, Sand Point Way NE, Westlake Ave N, E Madison St, Alki Ave SW, California Ave SW, Delridge Way SW, MLK Jr Way S, and Rainier Ave S. Neighborhood residential areas fill the intervening areas, along with city-owned open space and major institutions. This is consistent with existing land use patterns (discussed below). Industrial designations outside the MICs are typically adjacent to the MICs or other major roadways (e.g., the north shore of Lake Union, near Smith Cove, and near the I-5/I-90 interchange).

Exhibit 3.6-13. Centers and Villages—Existing Location, Size, and Activity Units

Center/Village	Analysis Area	Existing Acres	Existing AU	Existing AU/Ac.
Urban Centers[1]				
Downtown	4	952	359,361	377.4
First Hill/Capitol Hill	5	916	127,812	139.5
University Community	2	753	41,085	54.5
South Lake Union	4	340	80,456	236.7
Uptown	3	333	43,759	131.3
Northgate	2	412	23,611	57.3
Hub Urban Villages[1]				
Ballard	1	495	33,565	67.7
Bitter Lake Village	1	364	16,015	44.0
Fremont	1	214	15,431	71.9
Lake City	2	142	8,197	57.6
Mt Baker	8	491	17,689	36.0
West Seattle Junction	6	269	18,972	70.4
Residential Urban Villages[1]				
23rd & Union–Jackson	5	625	24,348	38.9
Admiral	6	98	4,842	49.2
Aurora–Licton Springs	1	327	14,428	44.1
Columbia City	8	335	11,352	33.9
Crown Hill	1	271	6,863	25.3
Eastlake	4	199	13,986	70.2
Green Lake	1	109	7,675	70.6
Greenwood–Phinney Ridge	1	94	7,956	84.5
Madison–Miller	5	145	9,488	65.3
Morgan Junction	6	113	3,865	34.1
North Beacon Hill	8	267	7,506	28.1
Othello	8	499	11,824	23.7
Rainier Beach	8	346	7,967	23.0
Roosevelt	2	170	10,448	61.4
South Park	7	263	3,879	14.7
Upper Queen Anne	3	53	4,709	89.5
Wallingford	1	258	10,868	42.2
Westwood–Highland Park	6	275	7,668	27.9
MICs				
Ballard–Interbay–Northend	3	932	17,660	NA
Greater Duwamish	7	4,953	62,335	NA

1 See **Exhibit 2.1-1** in **Chapter 2** for a cross-walk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~A~~lternatives ~~2–5~~.
Note: Activity units (AU) is the sum of residential population and jobs. Assumes an average household size of 2.05 per the King County Growth Management Planning Council. Highlighted densities or size fall outside King County's countywide center designation criteria of 160-500 acres or below the minimum 18 existing AU per acre (note PSRC's MIC designation criteria does not include an activity unit density threshold).
Sources: City of Seattle, 2023; BERK, 2023.

Exhibit 3.6-14. Future Land Use Designations—Percent Citywide and by EIS Analysis Area (Acres)

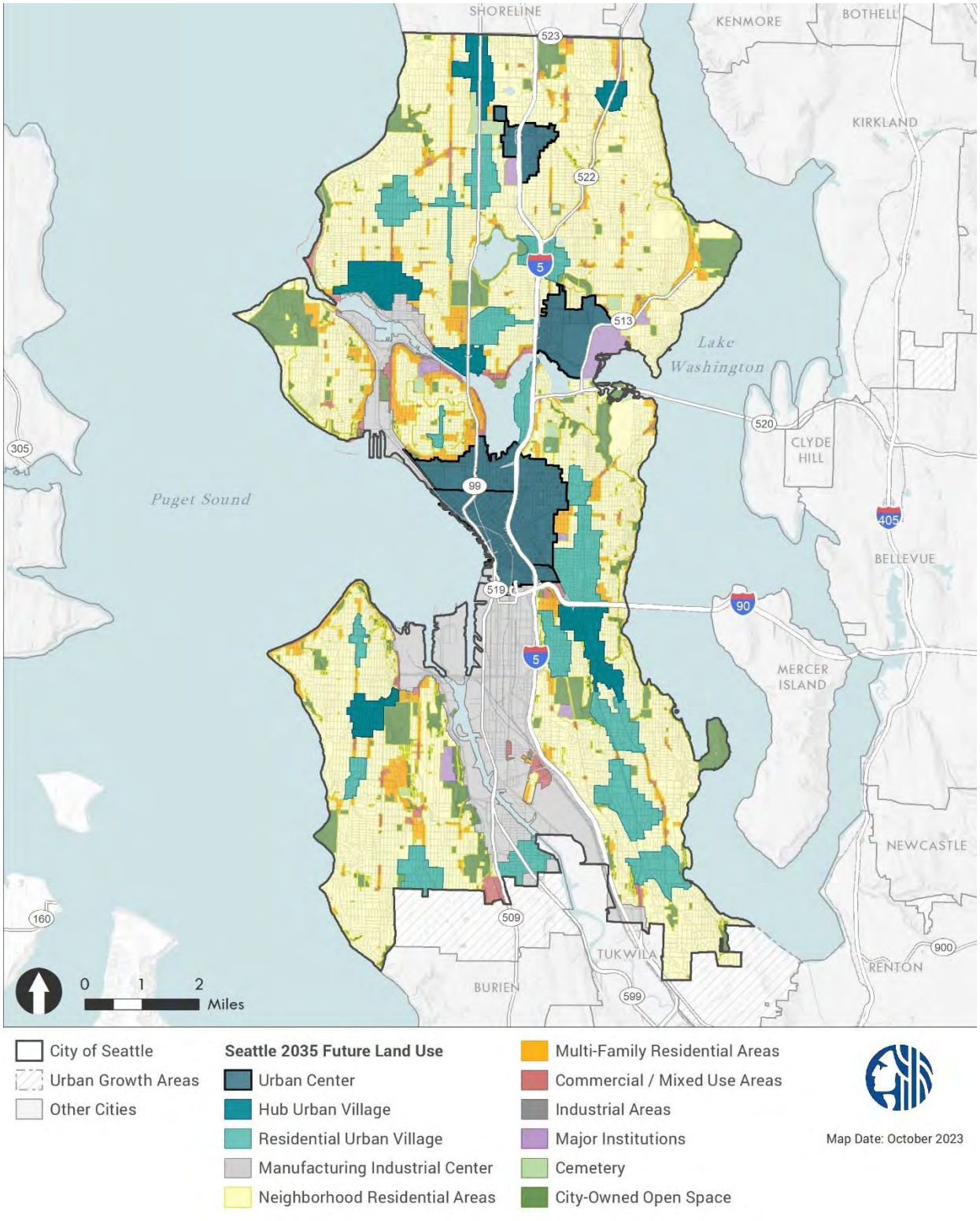


Seattle 2035 Future Land Use

- Urban Center
- Hub Urban Village
- Residential Urban Village
- Manufacturing Industrial Center
- Neighborhood Residential Areas
- Multi-Family Residential Areas
- Commercial/Mixed Use Areas
- Industrial Areas
- Major Institutions
- Cemetery
- City-Owned Open Space

Note: See **Exhibit 2.1-1** in **Chapter 2** for a cross-walk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~A~~lternatives ~~2–5~~.
Sources: City of Seattle, 2022; BERK, 2023.

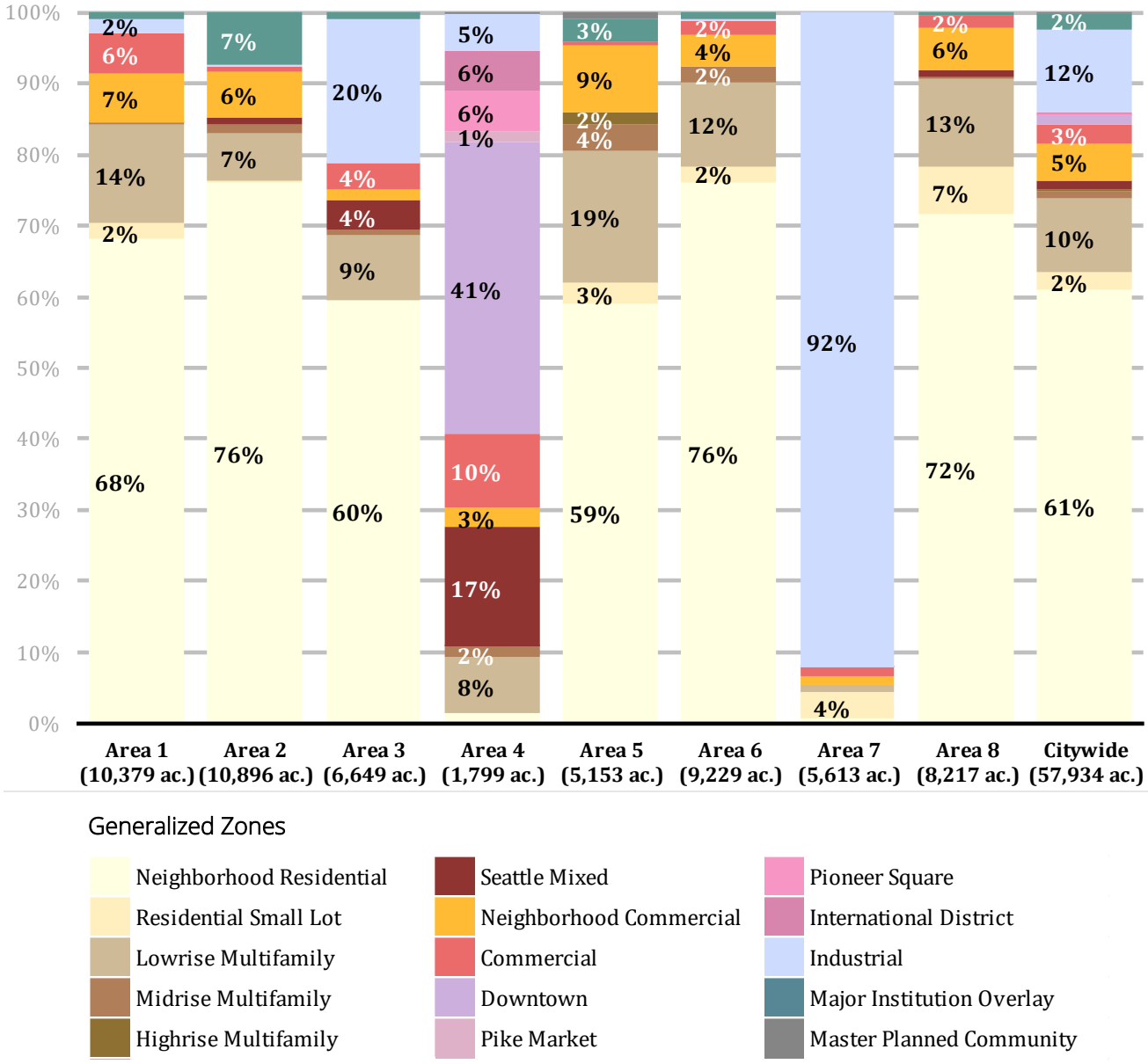
Exhibit 3.6-15. Citywide Future Land Use Designations



Note: See **Exhibit 2.1-1** in **Chapter 2** for a cross-walk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~A~~lternatives ~~2–5~~.
Sources: City of Seattle, 2022; BERK, 2023.

About three-quarters of the city is zoned for residential development, of which 61% is zoned Neighborhood Residential, 2% Residential Small Lot, and 12% zoned Multi-family. About 12% of the city is zoned industrial, 5% neighborhood commercial, and 3% commercial. The remaining zones account for about 5% of land in the city. See **Exhibit 3.6-16** and **Appendix G.1**.

Exhibit 3.6-16. Generalized Zoning—Percent Citywide and by EIS Analysis Area (Acres)

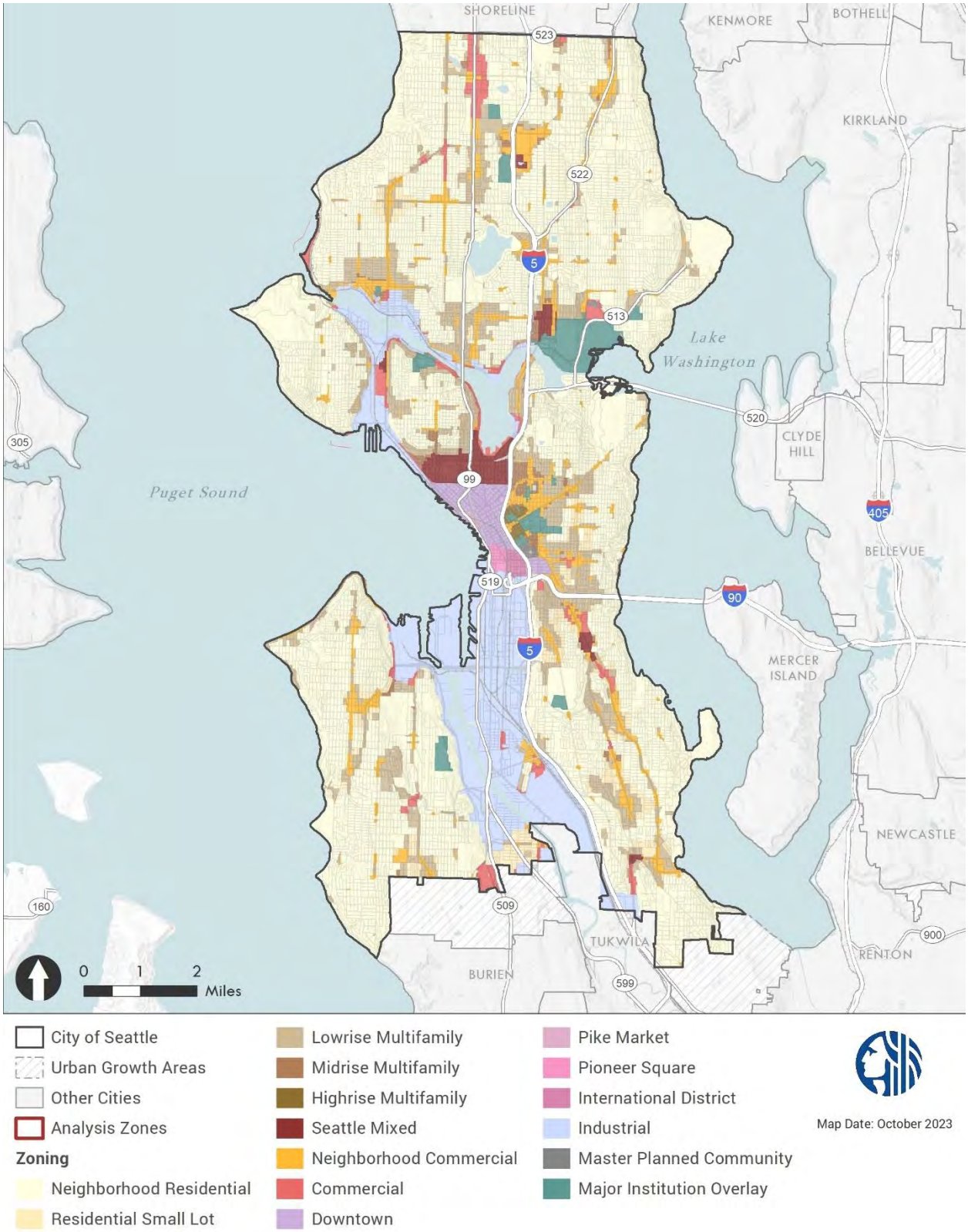


Sources: City of Seattle, 2022; BERK, 2023.

Generalized zoning in Seattle is mapped in **Exhibit 3.6-17**. Most areas designated and zoned for commercial/mixed-use or multifamily residential uses are located in centers or villages. The general commercial zones tend to be found on major arterials and are more auto-oriented. Neighborhood Commercial and Seattle Mixed zones use development standards intended to produce more walkable environments and are better for housing development. Commercial and multifamily zoning outside centers or villages tends to be concentrated around major arterials. Industrial zoning is concentrated in the two MICs. City zoning rules in these areas allow industrial activity such as manufacturing, warehousing, and shipping of goods through waterways, railways, and highways.

Most areas outside center, village, and MIC boundaries are zoned for neighborhood residential use. Neighborhood Residential zones cover much of the city. While these areas are commonly considered residential neighborhoods, they also include various uses beyond housing. For instance, most of the public park land is found in these zones, as are many schools, cemeteries, and fire stations. In most of these areas, houses are usually three stories or less in height and typically have yards and open space around them. Much of the land in these areas has been built to the densities allowed under current zoning rules.

Exhibit 3.6-17. Citywide Generalized Zoning



Sources: City of Seattle, 2022; BERK, 2023.

Shorelines

Shorelines designations overlay the primary future land use designations and zoning regulations. The Shoreline District encompasses 7,447 acres in the study area citywide and is regulated through zoning and shoreline environment designations. A little less than two-thirds of the shoreline citywide is within a conservancy shoreline environment (61%) and a little more than one-third is within an urban shoreline environment (39%). About 25% of the shoreline is designated Conservancy Recreation (CR), 22% is designated Conservancy Preservation (CP), and 10% is designated Conservancy Management (CM). Conservancy environments are typically located in waterways and on shorelines bordering neighborhood residential areas and city-owned open space. The other conservancy shoreline environments are concentrated in waterways such as Green Lake, Lake Union, the Lake Washington Ship Canal, and Smith Cove. About 19% of the shoreline is designated Urban Industrial (UI), primarily within the Greater Duwamish MIC and BINMIC. Urban Residential accounts for another 10% of the shoreline and is mostly located on the inland 200 feet of neighborhood residential areas. The other urban shoreline environments are concentrated around the Downtown waterfront and on the borders of Lake Union and the Lake Washington Ship Canal. **Exhibit 3.6-18** summarizes the acreage of each designation citywide and within each EIS Analysis Area. See also the **Shoreline Master Program** section for more detail about the SMP and the purpose of each environment designation.

Exhibit 3.6-18. Shoreline Environment Designations—Acres Citywide and by EIS Analysis Area

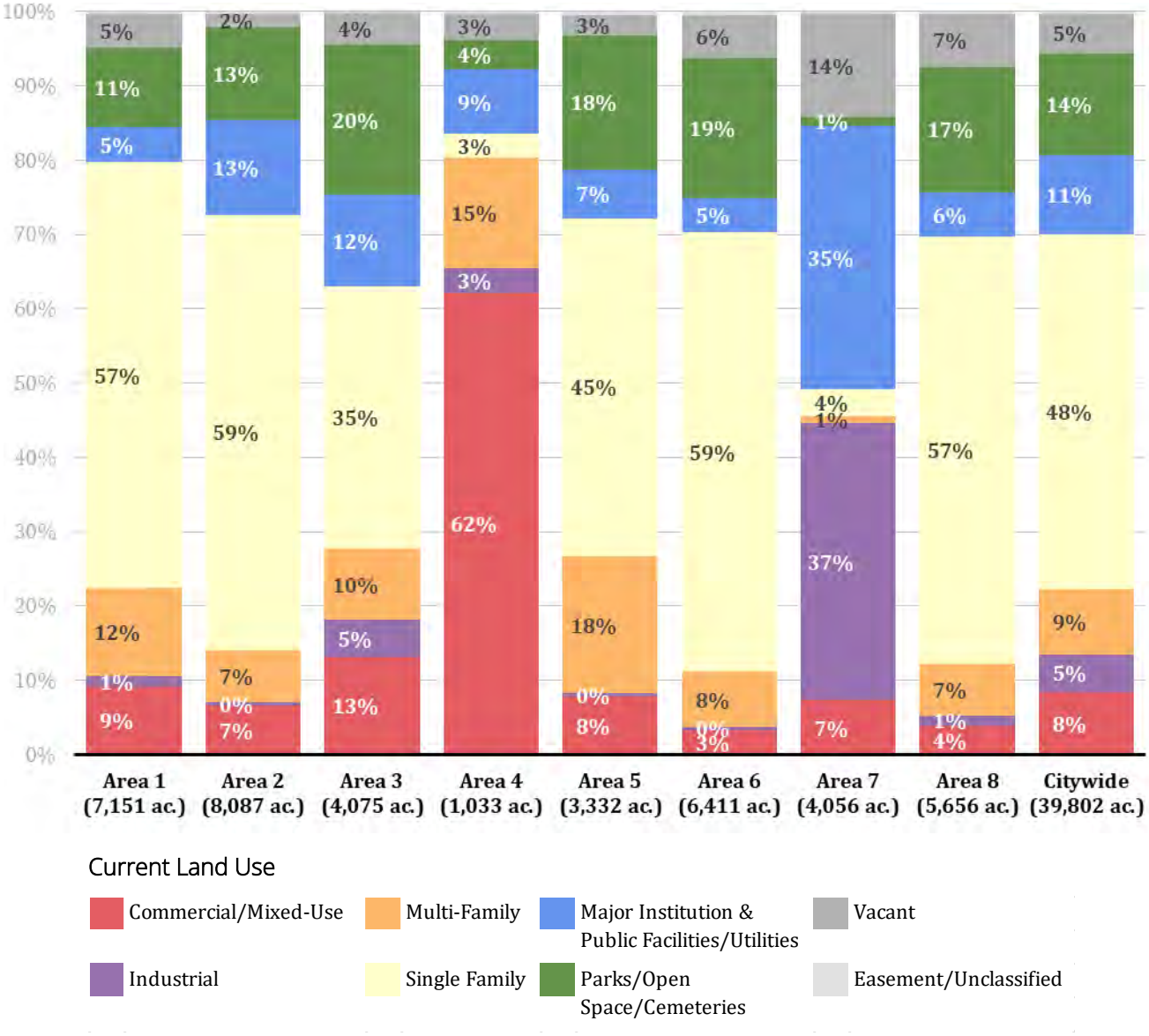
	EIS Analysis Area								
Shoreline Designation	1	2	3	4	5	6	7	8	Citywide
Conservancy Management	339 ac. (32.4%)	80 ac. (10.5%)	168 ac. (9.5%)	5 ac. (1.2%)	61 ac. (11.9%)	44 ac. (4.0%)	1 ac. (0.1%)	57 ac. (8.4%)	754 ac. (10.1%)
Conservancy Navigation	82 ac. (7.9%)	3 ac. (0.4%)	140 ac. (7.9%)	3 ac. (0.9%)	2 ac. (0.4%)	0.2 ac. (0.0%)	0.2 ac. (0.0%)	2 ac. (0.4%)	234 ac. (3.1%)
Conservancy Preservation	150 ac. (14.3%)	199 ac. (26.1%)	615 ac. (34.7%)	—	160 ac. (31.2%)	337 ac. (30.6%)	58 ac. (4.9%)	112 ac. (16.5%)	1,632 ac. (21.9%)
Conservancy Recreation	132 ac. (12.7%)	293 ac. (38.5%)	336 ac. (19.0%)	6 ac. (1.5%)	164 ac. (31.9%)	548 ac. (49.7%)	12 ac. (1.0%)	402 ac. (59.3%)	1,894 ac. (25.4%)
Conservancy Waterway	13 ac. (1.3%)	1 ac. (0.1%)	—	22 ac. (5.7%)	—	—	—	—	36 ac. (0.5%)
Urban Commercial	182 ac. (17.4%)	32 ac. (4.1%)	—	160 ac. (41.0%)	3 ac. (0.6%)	11 ac. (1.0%)	—	8 ac. (1.1%)	395 ac. (5.3%)
Urban General	20 ac. (1.9%)	—	21 ac. (1.2%)	0.3 ac. (0.1%)	—	—	4 ac. (0.3%)	—	44 ac. (0.6%)
Urban Harborfront	—	—	—	130 ac. (33.3%)	—	—	—	—	130 ac. (1.7%)
Urban Maritime	56 ac. (5.3%)	3 ac. (0.4%)	97 ac. (5.5%)	35 ac. (9.0%)	—	—	—	—	191 ac. (2.6%)
Urban Residential	70 ac. (6.7%)	151 ac. (19.8%)	86 ac. (4.8%)	28 ac. (7.3%)	123 ac. (23.9%)	162 ac. (14.7%)	—	97 ac. (14.3%)	716 ac. (9.6%)
Urban Industrial	2 ac. (0.2%)	—	309 ac. (17.4%)	0.2 ac. (0.1%)	—	0.1 ac. (0.0%)	1,110 ac. (93.7%)	—	1,421 ac. (19.1%)
Total Acres & Percent of Citywide Total	**1,045 ac. (14%)**	**761 ac. (10%)**	**1,772 ac. (24%)**	**390 ac. (5%)**	**513 ac. (7%)**	**1,102 ac. (15%)**	**1,185 ac. (16%)**	**678 ac. (9%)**	**7,447 ac. (100%)**

Sources: City of Seattle, 2022; BERK, 2022.

Existing Land Use Pattern

Exhibit 3.6-19 summarizes percent of existing land use acreage citywide and by analysis area, excluding water bodies and public right-of-way. Citywide, the largest existing land use category is single family residential, which comprises about 48% of existing land uses. Parks and open space/cemeteries account for about 14% and major institutions and public facilities and utilities account for about 11% of existing land uses. Multi-family and commercial/mixed-use comprise 9% and 8%, respectively, while industrial and vacant land uses each comprise 5% of total existing uses in Seattle.

Exhibit 3.6-19. Current Land Use—Percent Citywide and by EIS Analysis Area (Acres)



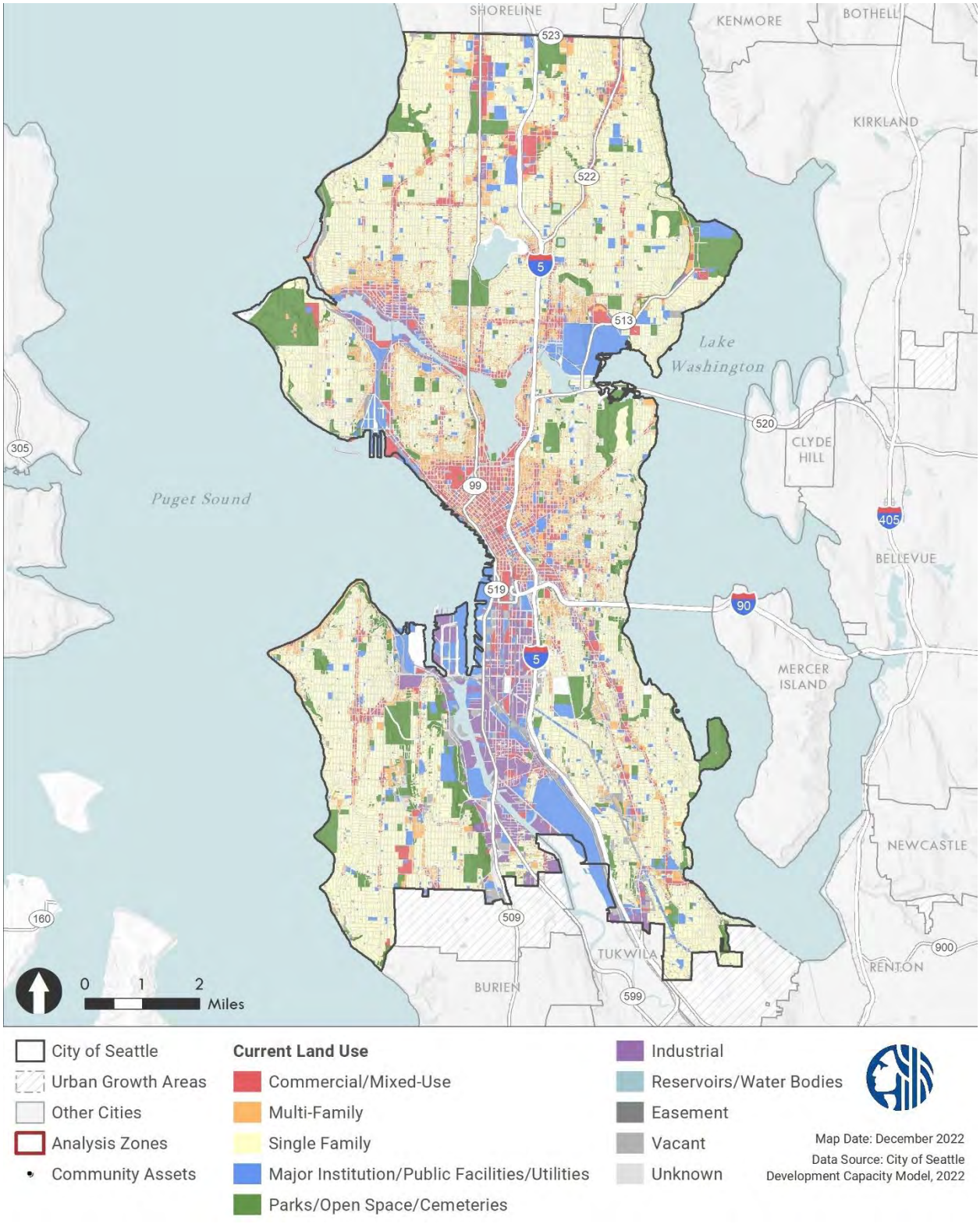
Sources: City of Seattle, 2022; BERK, 2023.

Exhibit 3.6-20 maps existing land use distribution across the city. The highest concentrations of commercial, mixed-use, and multi-family development are in the four urban centers that constitute the area sometimes called the "center city" (Downtown, First Hill/Capitol Hill, South Lake Union, and Uptown). Housing in these areas might be built as a stand-alone structure or along with commercial space. Mixed-use areas or projects contain residential and commercial uses and often have offices or stores on the ground floor with housing above. Other centers, villages, and smaller nodes around the city also contain varying levels of commercial, mixed-use, and multi-family development.

Outside of the centers and villages, concentrations of commercial, mixed-use, and multifamily development generally follow main arterials such as Holman Rd NW/15t Ave NW/15th Ave W, SR 99, Greenwood/Phinney Ave N, 15th Ave NE, Lake City Way NE, Sand Point Way NE, Westlake Ave N, E Madison St, Alki Ave SW, California Ave SW, Delridge Way SW, MLK Jr Way S, and Rainier Ave S.

Single-family residential neighborhoods fill the intervening areas, along with parks, open space, and major institutional uses. Industrial development is concentrated in the Greater Duwamish MIC in south central Seattle and in the BINMIC northwest of Downtown (along the Duwamish River's historic meandering flood plain, Elliott Bay, Lake Union, and Salmon Bay). Only 5% of land is vacant, most of which is located near industrial areas or rail lines, along shorelines with critical areas, or adjacent to major utility easements or trails (such as the Chief Sealth Trail in Area 8). Some additional vacant lands are scattered throughout the single family areas.

Exhibit 3.6-20. Citywide Current Land Use



Sources: City of Seattle, 2022; BERK, 2022.

Height, Bulk, & Scale

The FLUM (**Exhibit 3.6-15**) illustrates the general building massing pattern across the city. Greater allowed height, bulk, and mass are generally concentrated in centers and villages. The manufacturing/industrial areas allow a range of heights, but most new development doesn't maximize the height allowance. Most of the city is zoned neighborhood residential with most of the buildings being 1- and 2-story detached homes.

Transitions

Existing development patterns for transitions between scales—both from one zone to another and within a single zone—vary across the city. Many areas with long established zone boundaries exhibit stark transitions between multi-family or commercial buildings and low-density residential areas. This is especially true in relatively recently developed areas of the city and areas that have seen intense development in recent decades, like Ballard. See **Exhibit 3.6-21**.

Exhibit 3.6-21. Urban Village Boundary (Black Dashed Line) In Ballard

Source: Image: Landsat/ Copernicus. Data: SI, NOAA, US Navy, NGA, GEBCO Data LDEO-Columbia, NSF, NOAA.

Some older areas exhibit gradual transitions from more to less intensive development types based on pre-zoning development patterns, with more intensive uses more likely to be developed near transit routes and amenities like parks and views. More and less intense buildings within a single zone intermingle more in older neighborhoods, where a variety of apartment/condo developments are regularly found adjacent to single family houses. See **Exhibit 3.6-22** and **Exhibit 3.6-23**.

Exhibit 3.6-22. Intermingling Development Types

Source: MAKERS, 2022.

Exhibit 3.6-23. Gradual Transition of Residential Uses In Capitol Hill

Note: Shows gradual transition from multi-family (blue) to single family (pink) uses in Capitol Hill.
Source: King County Assessor, 2021; MAKERS, 2023.

In recent years, development in centers and villages where parking is not required (primarily close to transit service) has created less disruptive transitions to the low-density residential scale, compared to areas where abundant car parking is required. Parking infrastructure like garages and surface parking presents a visual contrast with typical building design in low-density residential areas, where parking is visible, but not visually prominent. See **Exhibit 3.6-24**.

Exhibit 3.6-24. Driveways and Garages Visual Impacts

Note: Left: Infill development with new driveways and garages. Right: Nearby low-density neighborhood. Parking is visible, but less prominent.
Source: Google Maps Streetview. © Google 2023.

Tree Canopy

Seattle's residential lots currently provide much of Seattle's tree canopy. However, as Seattle becomes denser to meet the needs of a growing population, new buildings cover more ground, especially when surface parking is provided, causing removal of existing trees and/or reducing space available for new trees. Private property currently provides about 72% of tree canopy, while 28% is provided on public property including street rights-of-way, parks, and other City-owned land.[23] Since 2016, the City of Seattle saw an overall net loss of urban tree canopy (255 acres, 1.7%) while the goal is to increase tree canopy. The biggest losses were in parks (111 acres, 5.1%) and Neighborhood Residential areas (87 acres, 1.2%). Seattle's *Canopy Cover Assessment* states, "Loss is not equitable—Neighborhoods impacted by racial and economic injustice started with less canopy and lost more than the citywide average."[24]

Shadows

Seattle's hilly topography plays a major role in the prevalence of shadows. Generally, the north side of a hill or areas within a valley experience shadows during longer periods of the day. Trees, especially large, dense evergreens, cast significant shadows year-round. Building heights

[23] City of Seattle, Seattle Tree Canopy Assessment, 2016.
[24] City of Seattle, Urban Forestry Results Summary *Seattle's Canopy Cover Assessment*, 2023.

also play a major role, with buildings over 2 stories typically casting shadows onto the sidewalk for most of the winter. Unique shadow conditions are noted in the Analysis Area descriptions.

Views

Viewpoints and scenic routes are found throughout the city. As to be expected, they concentrate along waterfronts and/or topographically high points. The Duwamish lacks SEPA-protected viewpoints (though it does have protected "shoreline viewpoints"), likely due to the area being at a low point and public access being discouraged in the industrial area. North Seattle also has fewer protected viewpoints, despite existing high point views such as from Phinney Ridge overlooking Ballard and the Puget Sound. Factors that may influence a lack of viewpoints in north Seattle may include a combination of topography with fewer natural viewpoints, large trees blocking views, and limited public space at high points. A similar situation may exist in Rainier Valley, where land is topographically lower.

Analysis Areas

Area 1: NW Seattle

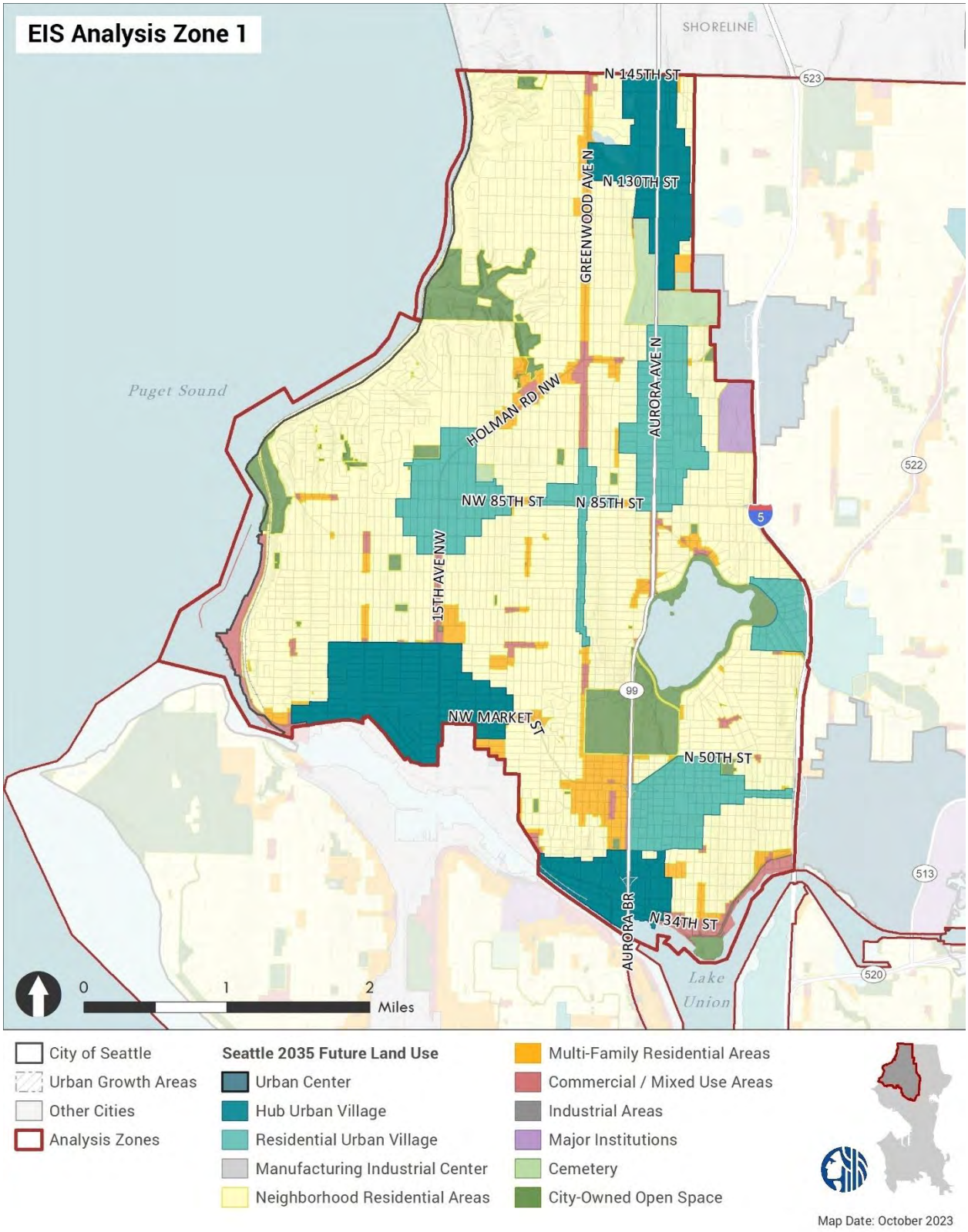
Future Land Use, Zoning, & Shorelines

Area 1 includes the northwest portion of Seattle that is west of I-5 and north of the Lake Washington Ship Canal. It includes approximately 7,151 acres of buildable lands, or 18% of the buildable lands citywide, and includes three hub urban villages and five residential urban villages: the Ballard, Bitter Lake, and Fremont hub urban villages and the Aurora-Licton Springs, Crown Hill, Green Lake, Greenwood-Phinney Ridge, and Wallingford residential urban villages. Most commercial, mixed-use, and lowrise multi-family future land use and zoning designations are concentrated in the urban villages with commercial designations generally adjacent to major arterials and lowrise multi-family designations on the edges of the urban village boundaries.

Outside of the urban villages, commercial, mixed-use, and multi-family future land use and zoning designations generally follow major arterials including SR 99, Greenwood/Phinney Ave N, and 15th Ave NW/Holman Rd NW. A small portion of the land along the north shore of Lake Union is designated and zoned industrial. Major parks and open space in the area include Woodland Park Zoo, Green Lake Park, Golden Gardens, Carkeek Park, and Gas Works. North Seattle College is also located adjacent to I-5 in the central eastern portion of the analysis area. Neighborhood residential future land use and zoning designations fill in the intervening areas. Future land use and zoning acreage within the analysis area are detailed in **Exhibit 3.6-14** and **Exhibit 3.6-16** and mapped in **Exhibit 3.6-25** and **Exhibit 3.6-26**.

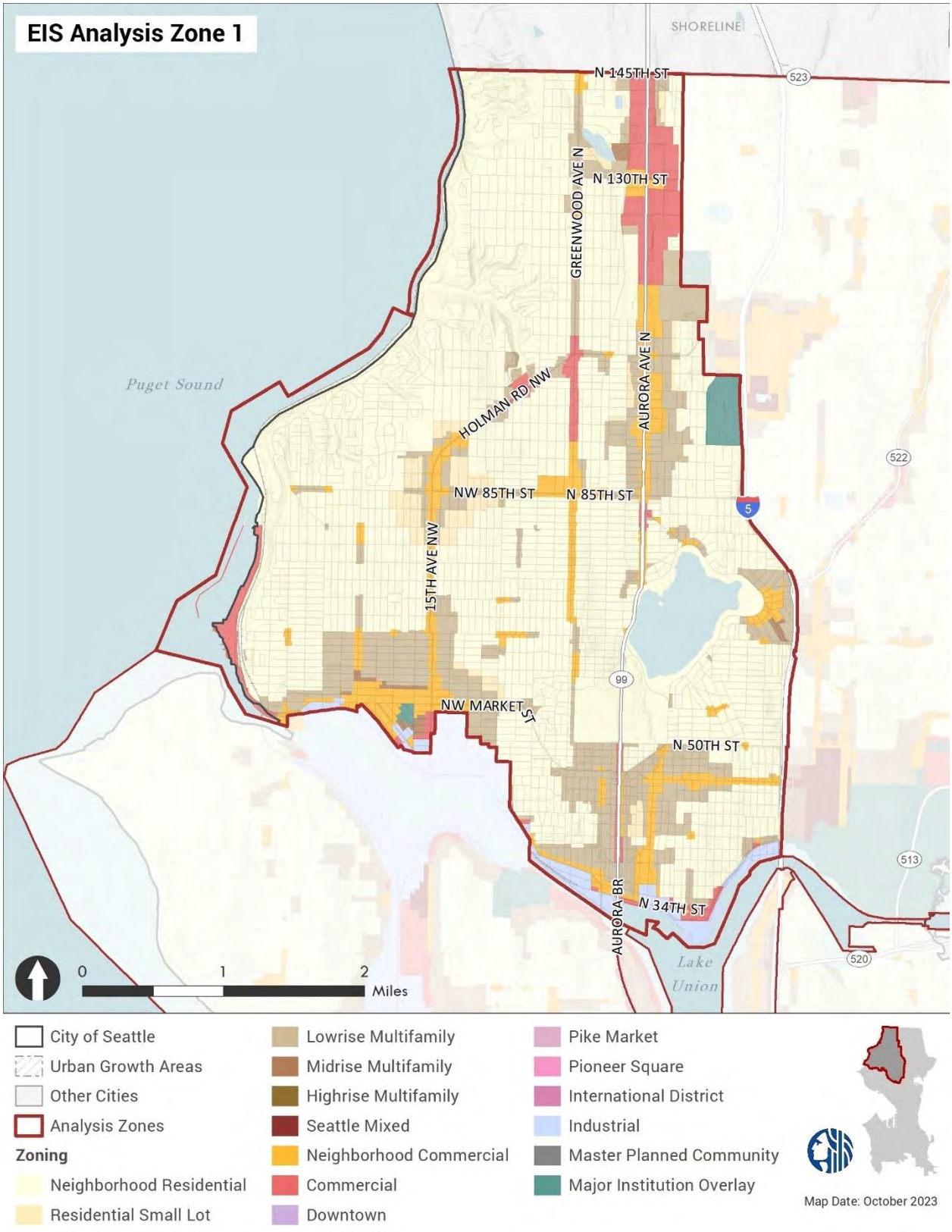
Area 1 includes about 14% of the city's designated shoreline district (1,045 acres). A little over two-thirds of this area is within a conservancy shoreline environment, including Conservancy Management (32%) in Green Lake and a combination of Conservancy Preservation (14%) and Recreation (13%) on Puget Sound from Golden Gardens north to the city limit. Another 29% of this area is designated Urban Commercial (near Shilshole Bay), Urban Maritime (along the north shore of Lake Union), and Urban Residential (inland along Puget Sound north of Golden Gardens). Designated shoreline acreage within the analysis area is detailed in **Exhibit 3.6-18** and mapped in **Exhibit 3.6-27.**

Exhibit 3.6-25. Area 1: NW Seattle—Future Land Use Designations



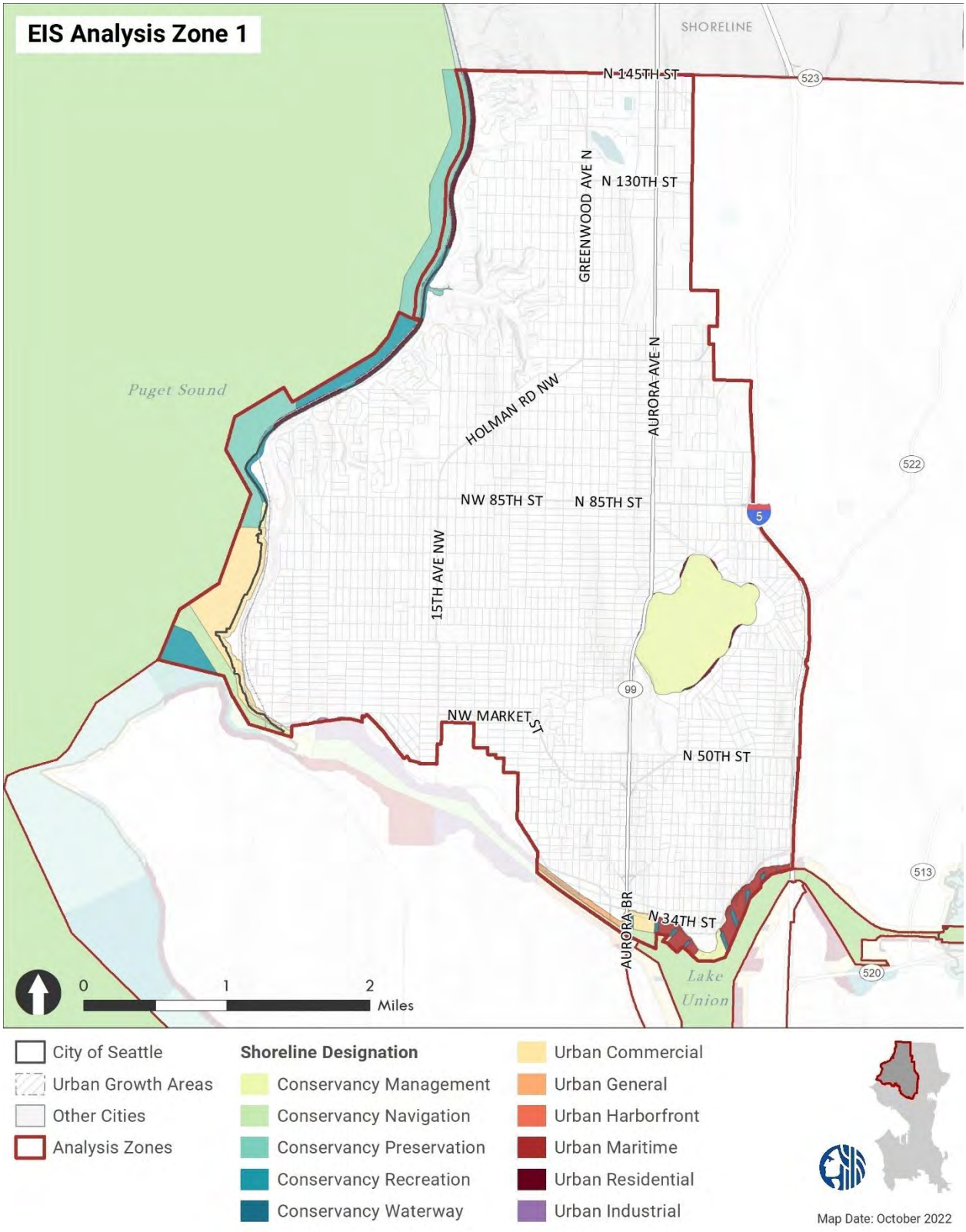
Source: City of Seattle, 2022; BERK, 2022.

Exhibit 3.6-26. Area 1: NW Seattle—Zoning



Source: City of Seattle, 2022; BERK, 2023.

Exhibit 3.6-27. Area 1: NW Seattle—Shoreline Designations



Source: City of Seattle, 2022; BERK, 2022.

Existing Land Use & Urban Form

Existing Uses

The largest existing land use category is single family residential, which comprises about 57% of existing uses (versus 48% citywide). A slightly higher percentage of land uses are also multi-family residential (12% versus 9% citywide). Existing commercial, mixed-use, and multi-family uses as well as community assets are primarily within the urban village boundaries, with the densest concentrations in the Ballard, Bitter Lake, and Fremont hub urban villages. Commercial uses in Bitter Lake are typically larger-scale big-box retailers while those in Ballard and Fremont are smaller scale. Additional concentrations of commercial, mixed-use, and multi-family uses run adjacent to major roadways between the urban villages and along the Lake Washington Ship Canal and Shilshole Bay.

Most industrial uses in the analysis area are near Lake Washington Ship Canal in Ballard and along the north shore of Lake Union or on SR 99 in the Bitter Lake and Aurora-Licton Springs urban villages. The BNSF railway also runs along Puget Sound throughout the analysis area.

Current land use acreage is detailed in **Exhibit 3.6-19** and mapped in **Exhibit 3.6-28**.

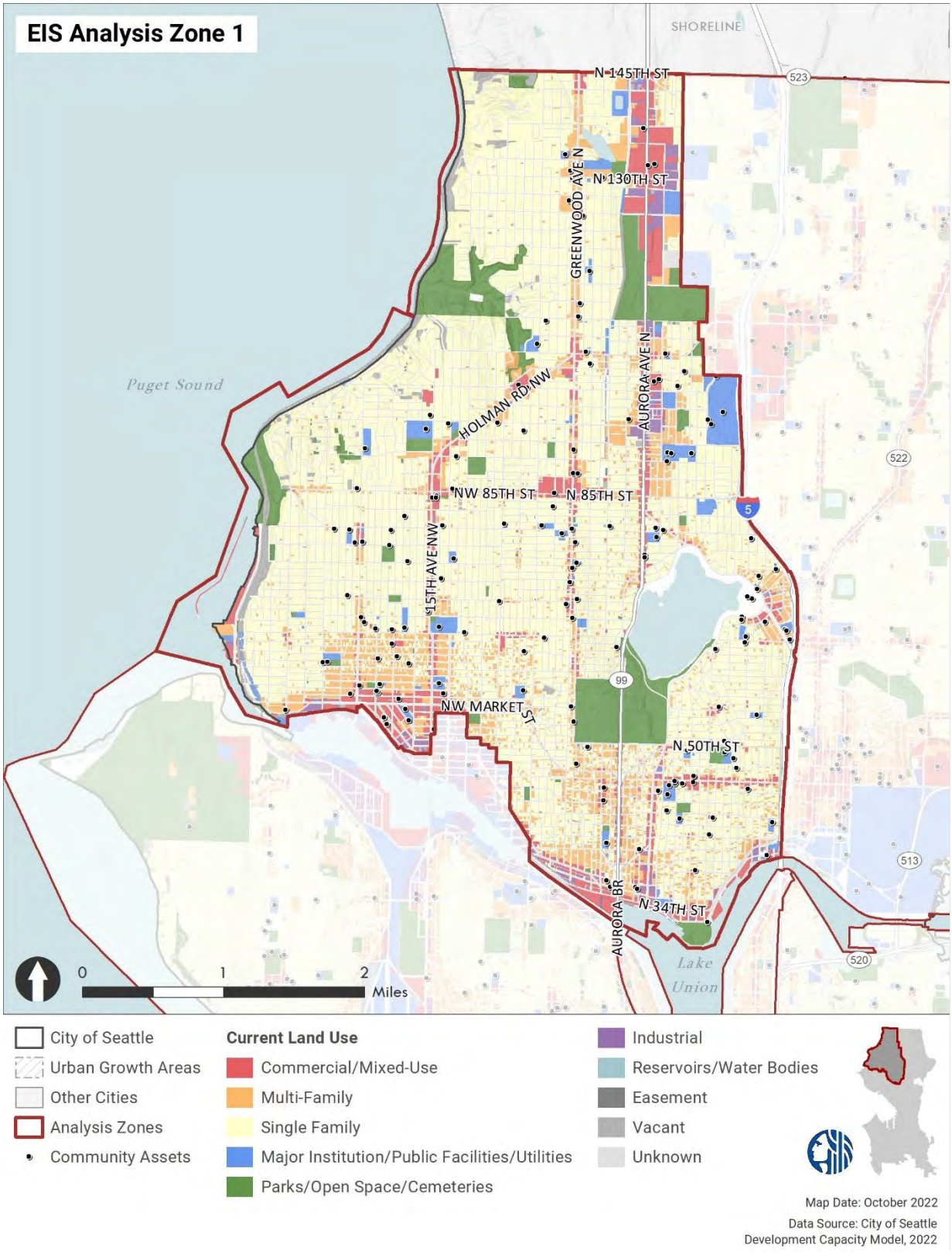
General Urban Form

Areas north of 85th St were largely developed prior to annexation to the City of Seattle in 1954. These areas tend to have a more automobile-oriented character than areas further south; in many places sidewalks are absent, and buildings are designed around automobile access. These trends are especially pronounced on Aurora Ave/SR-99 where pedestrian-hostile design is compounded by long-term disinvestment in buildings and public facilities, creating an environment that can feel unsafe for many people. However, this harsh environment can also serve as a haven for those who have been pushed out of other areas of the city due to high housing costs.

Height

The tallest buildings in Area 1 are found in the Ballard, Fremont, and Bitter Lake urban villages. These three urban villages have a significant number of 6- to 8-story buildings located along and south of NW 56th St in Ballard, along N 34th St and Stone Way in Fremont, and along Aurora Ave in Bitter Lake. Additionally, there are some 5- to 6-story buildings along Greenwood Ave, 3- to 5-story buildings in the Green Lake Residential Urban Village, and 3-story townhomes in Crown Hill. However, most of the area is zoned neighborhood residential and has building heights of 1 to 2 floors.

Exhibit 3.6-28. Area 1: NW Seattle—Current Land Use



Source: City of Seattle, 2022; BERK, 2022.

Area 2: NE Seattle

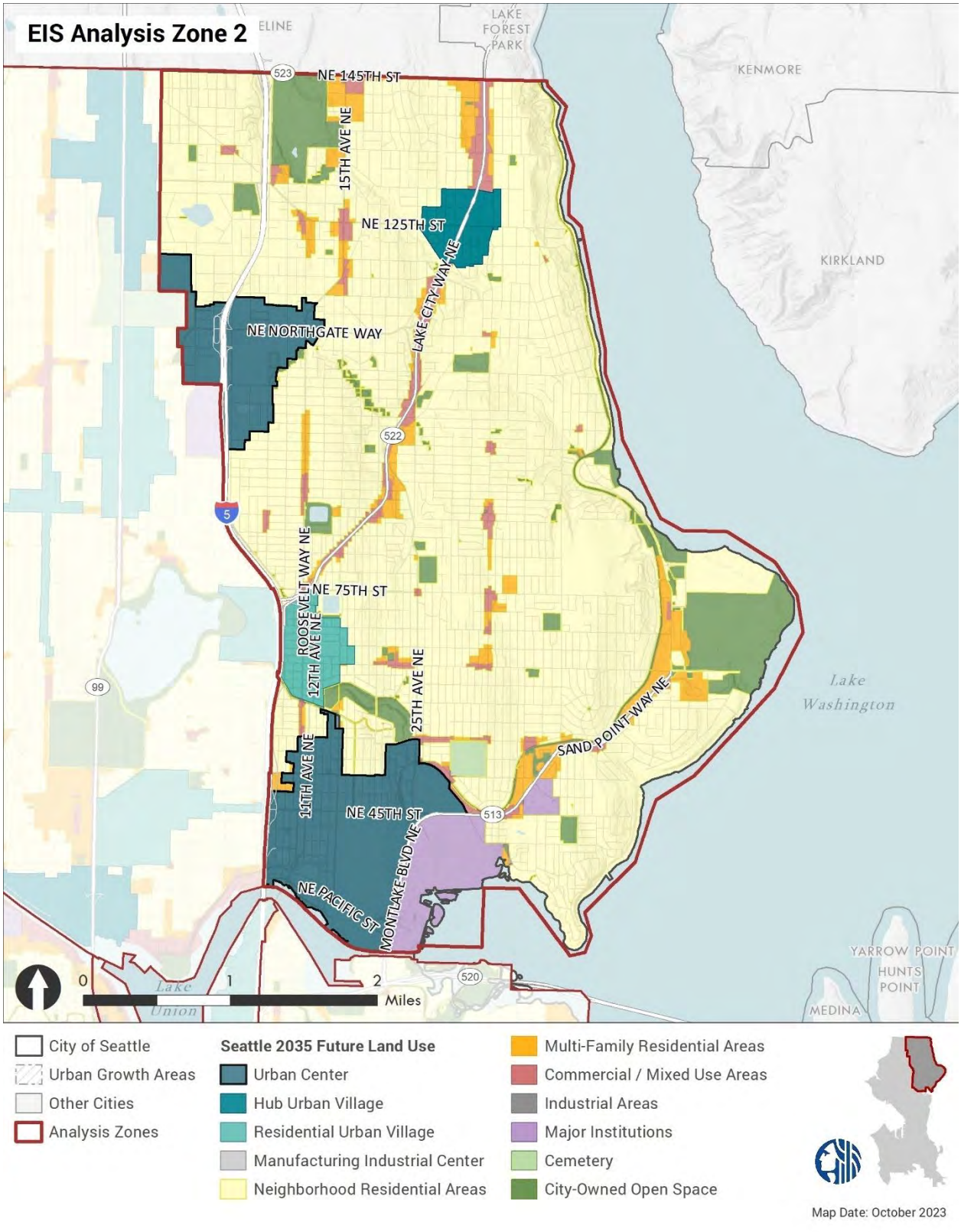
Future Land Use, Zoning, & Shorelines

Area 2 includes the northeast portion of Seattle east of Interstate 5, south of NE 145th Street (Seattle's northern most boundary), and north of Portage Bay and the Montlake Cut. It includes approximately 8,087 acres of buildable land, or 20% of the buildable lands citywide. Additionally, Area 2 includes the Northgate and University Community urban centers, the Lake City Hub Urban Village, and the Roosevelt Residential Urban Village. A majority of the commercial, mixed-use, and multi-family future land use and zoning designations are concentrated in the centers and villages with commercial and multi-family designations adjacent to major arterials running between center and village boundaries.

Outside of the centers and villages, commercial, mixed-use, and multi-family future land use and zoning designations generally follow Sandpoint Way NE, Lake City Way NE, Roosevelt Way NE, 15th Ave E, and 35th Ave NE. Major parks and open space in the area include Cowen and Magnuson Parks, the Calvary Cemetery, Sand Point County Club, and Jackson Park Golf Course. The University of Washington is located within a major institution overlay, which is a key regulatory feature of this subarea. Neighborhood residential future land use and zoning designations fill in the intervening areas. Future land use and zoning acreage within the analysis area are detailed in **Exhibit 3.6-14** and **Exhibit 3.6-16** and mapped in **Exhibit 3.6-29** and **Exhibit 3.6-30**.

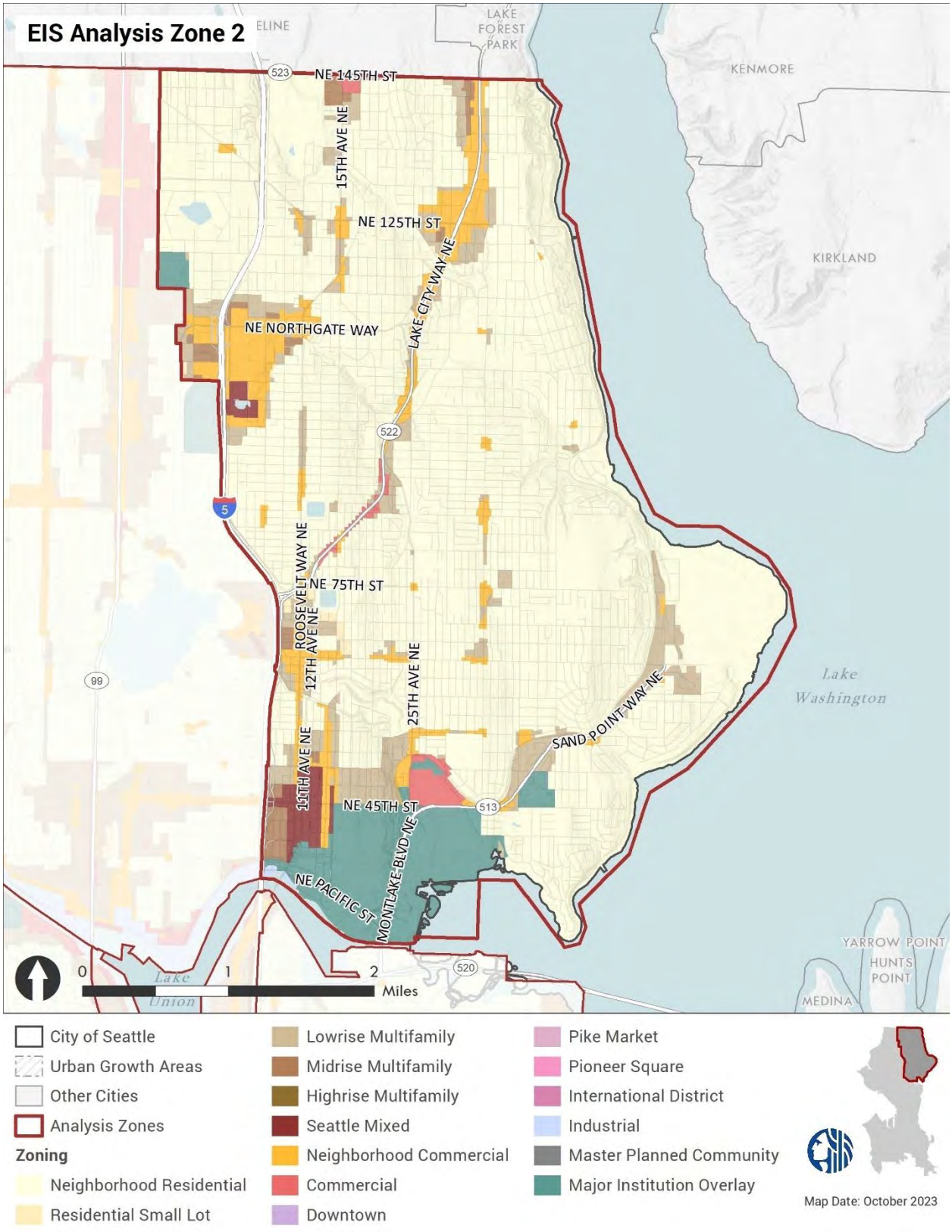
Area 2 includes about 10% of the city's designated shoreline district (761 acres). Nearly 75% of this area is within a conservancy shoreline environment, including Conservancy Management (11%) on the northern shoreline of Magnuson Park, Conservancy Preservation (26%) across the extent of Union Bay just SW of Laurelhurst neighborhood, and Conservancy Recreation (39%) on the eastern and southern shoreline of Magnuson Park. Another 19% are designated as Urban Residential extending north from Magnuson Park to the NE 145th St and south of Magnuson Park to the western most boundary of Laurelhurst. Designated shoreline acreage within the analysis area is detailed in **Exhibit 3.6-18** and mapped in **Exhibit 3.6-31**.

Exhibit 3.6-29. Area 2: NE Seattle—Future Land Use Designations



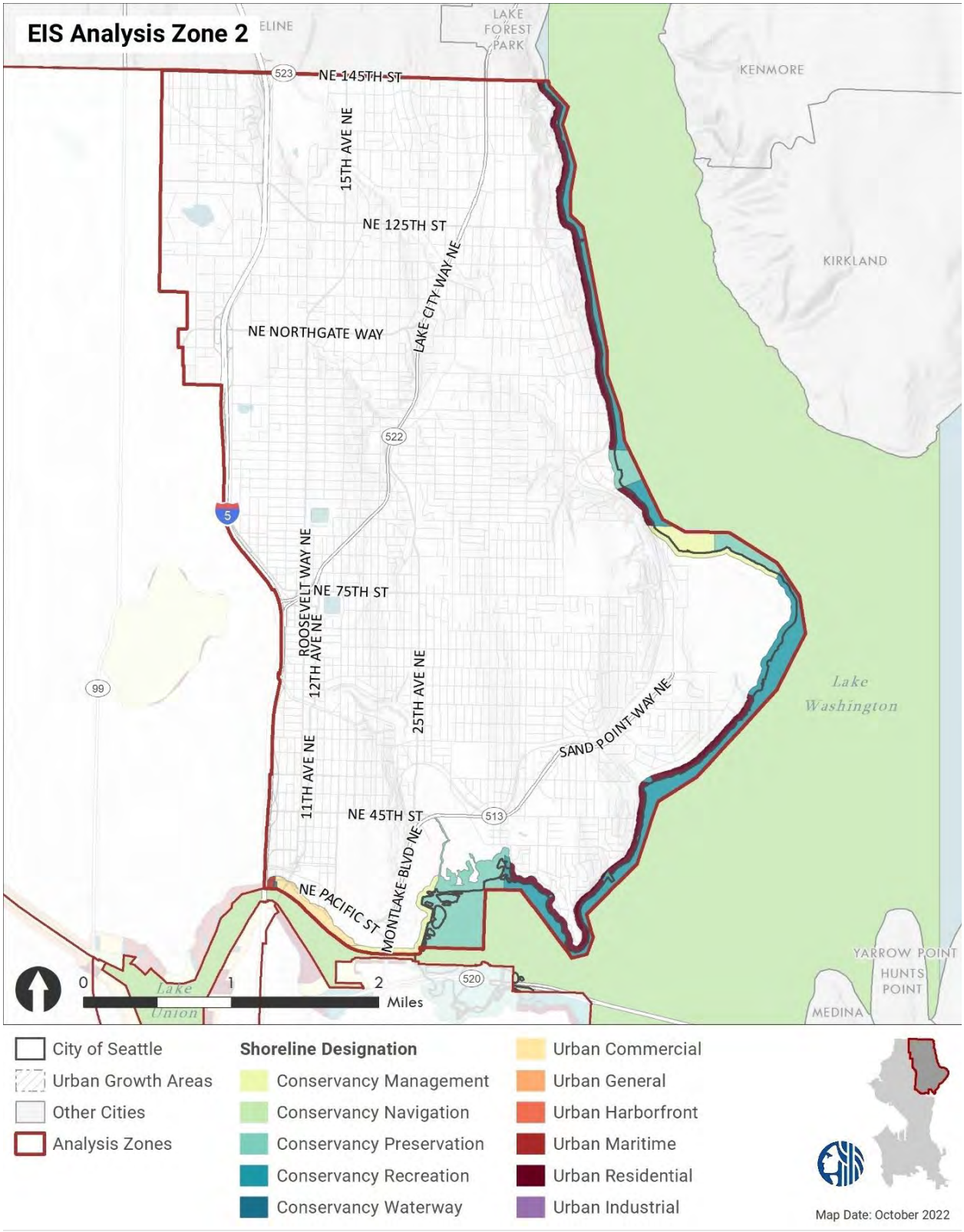
Source: City of Seattle, 2022; BERK, 2023.

Exhibit 3.6-30. Area 2: NE Seattle—Zoning



Source: City of Seattle, 2022; BERK, 2023.

Exhibit 3.6-31. Area 2: NE Seattle—Shoreline Designations



Source: City of Seattle, 2022; BERK, 2022.

Existing Land Use & Urban Form

Existing Uses

The largest existing land use category is single family residential, which accounts for 59% of the land (versus 48% citywide). Existing commercial, mixed-use, and multi-family uses, as well as a majority of the community assets, are located within the existing center and village boundaries. Commercial and mixed uses found in the Roosevelt and Lake City urban villages are typically vertically dense apartment buildings with ground-floor commercial around a main commercial corridor that supports essential neighborhood amenities. In comparison, the University Community and Northgate urban centers have denser and more intensive land uses which are often at a greater scale than is found in urban villages. Outside of the center and village boundaries, commercial and multi-family development is concentrated along the extents of Sandpoint Way NE, Lake City Way NE, Roosevelt Way NE, 15th Ave E, and 35th Ave NE.

Major institutions and public facilities account for 13% of the existing land uses including the University of Washington and the National Oceanic and Atmospheric Administration Western Regional Center. Parks, open space, and cemeteries account for another 13% of the analysis area consisting of Cowen and Magnuson Parks, the Calvary Cemetery, Sand Point County Club, and Jackson Park Golf Course. The share of industrial land uses in the analysis area is lower than the city overall (0.4% versus 5%).

Current land use acreage is detailed in **Exhibit 3.6-19** and mapped in **Exhibit 3.6-32**.

General Urban Form

Areas north of NE 85th St (west of 20th Ave NE) and NE 65th St (east of 20th Ave NE) were largely developed prior to annexation to the City of Seattle in 1954. These areas tend to have a more automobile-oriented character than areas further south; in many places sidewalks are absent, and buildings are designed around automobile access. Lake City Way, a major arterial and designated state highway (SR 522), runs through the northern half of Area 2. The road has been upgraded and expanded continuously since it opened in 1909 and combines elements of separated highway, urban arterial, and commercial main street character. Because some segments have fewer design improvements to slow drivers, driver behavior can create a hostile and unpredictable pedestrian environment in Lake City Way's neighborhoods and business districts.

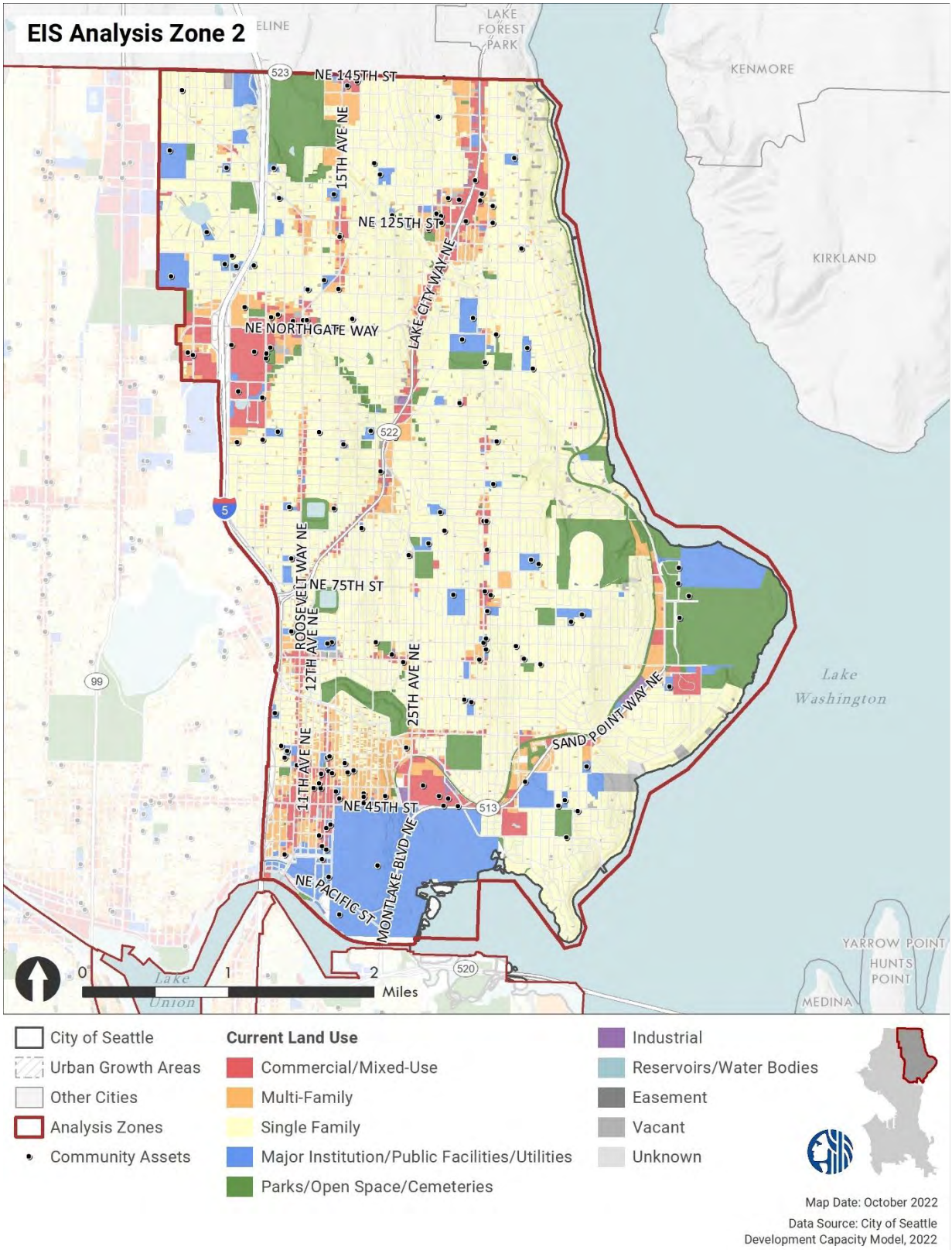
Heights

Building heights in the Northgate Urban Center, Lake City Hub Urban Village, and around the Roosevelt light rail station are between 6- to 8-stories, while the University Community Urban Center is experiencing high-rise development of buildings twenty stories or more. The rest of the analysis area is predominantly 1- to 2-story buildings.

Transitions

A major transition between intensities occurs between the University Community Urban Center and low-density residential areas to the north.

Exhibit 3.6-32. Area 2: NE Seattle—Current Land Use



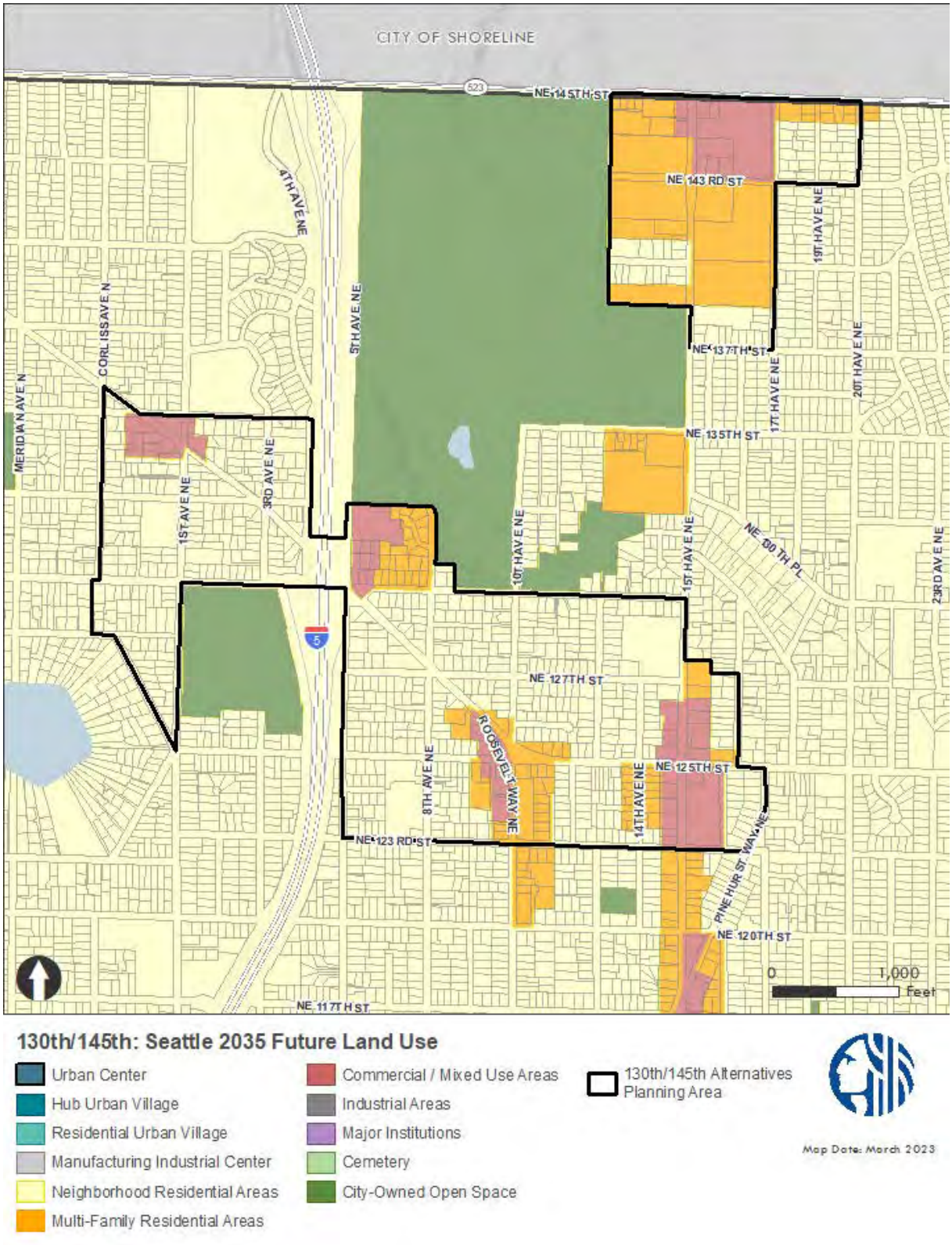
Source: City of Seattle, 2022; BERK, 2022.

130th/145th Station Area

Future Land Use, Zoning, & Shorelines. Future land use and zoning in the 130th Station Area is primarily neighborhood residential with some commercial, mixed-use, and multi-family designations near 130th Street and Roosevelt Way to the east of I-5 and around 125th Street. Future land use and zoning in the 145th Station Area is primarily commercial, mixed-use, and multi-family along 15th Ave with some neighborhood residential on the station area perimeter. There are no designated shorelines in either station area. See **Exhibit 3.6-33** and **Exhibit 3.6-34**.

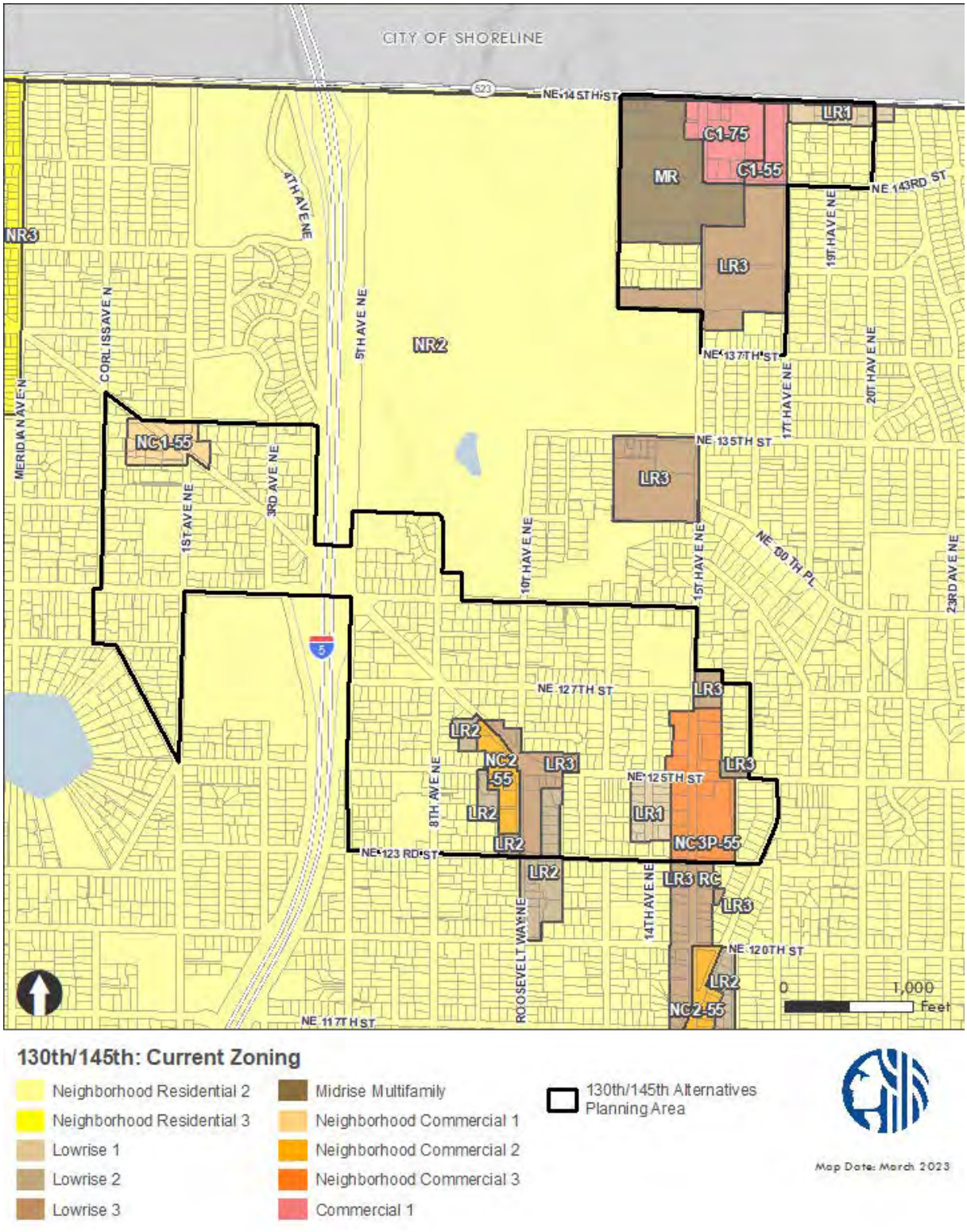
Existing Land Use. Existing commercial, mixed-use, and multi-family uses are concentrated around 130th Street and Roosevelt Way to the east of I-5, around 125th Street and 15th Ave, and within the 145th Station Area. These generally consist of single-story commercial or 3-4 story multi-family development with a limited amount of mixed-use near Roosevelt and 125th Street. A portion of the Jackson Park Golf Course is within both station areas. Other parks and open space in the 130th Station Area include Northacres Park, the Flicker Haven and Licorice Fern Natural Areas on Thornton Creek, and the eastern edge of Haller Lake (which is surrounded by single family development but is accessible by a public street end on the west of the lake outside the Station Area). Billings Middle School, Lakeside Middle School, and several churches are also within the 130th Station Area. Single family uses fill in the intervening areas and comprise the majority of the 130th Station Area. See **Exhibit 3.6-35**.

Exhibit 3.6-33. 130th/145th Station Area—Future Land Use Designations



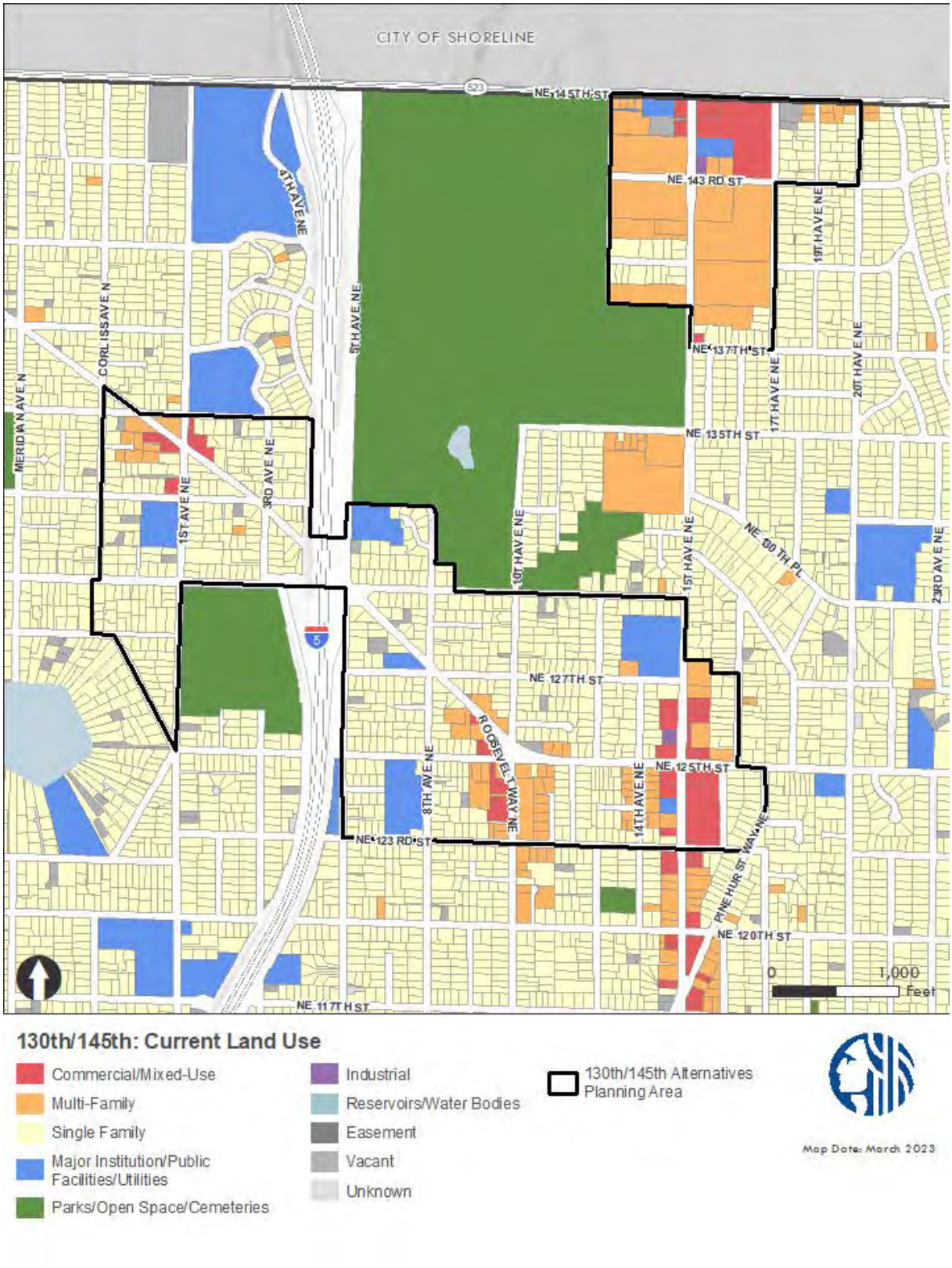
Sources: City of Seattle, 2022; BERK, 2023.

Exhibit 3.6-34. 130th/145th Station Area—Current Zoning



Sources: City of Seattle, 2022; BERK, 2023.

Exhibit 3.6-35. 130th/145th Station Area—Current Land Use



Sources: City of Seattle, 2022; BERK, 2023.

Heights. Buildings around the 130th light rail station are mostly 1- and 2-story as much of the area is zoned neighborhood residential. At the 145th bus rapid transit station, building south of 145th are mostly 3-story apartments. Additionally, close to the 130th station is the Pinehurst area, where the tallest buildings are 3- and 4-story buildings. See **Exhibit 3.6-36**.

Exhibit 3.6-36. Typical Buildings in the 130th/145th Station Area

Source: MAKERS, 2023.

Views. Although no SEPA-protected views exist in the area, the 8th Ave NE right-of-way/utility corridor provides a unique view looking north into Jackson Park. See **Exhibit 3.6-37**.

Exhibit 3.6-37. 8th Ave NE View to Jackson Park

Source: MAKERS, 2023.

Area 3: Queen Anne/Magnolia

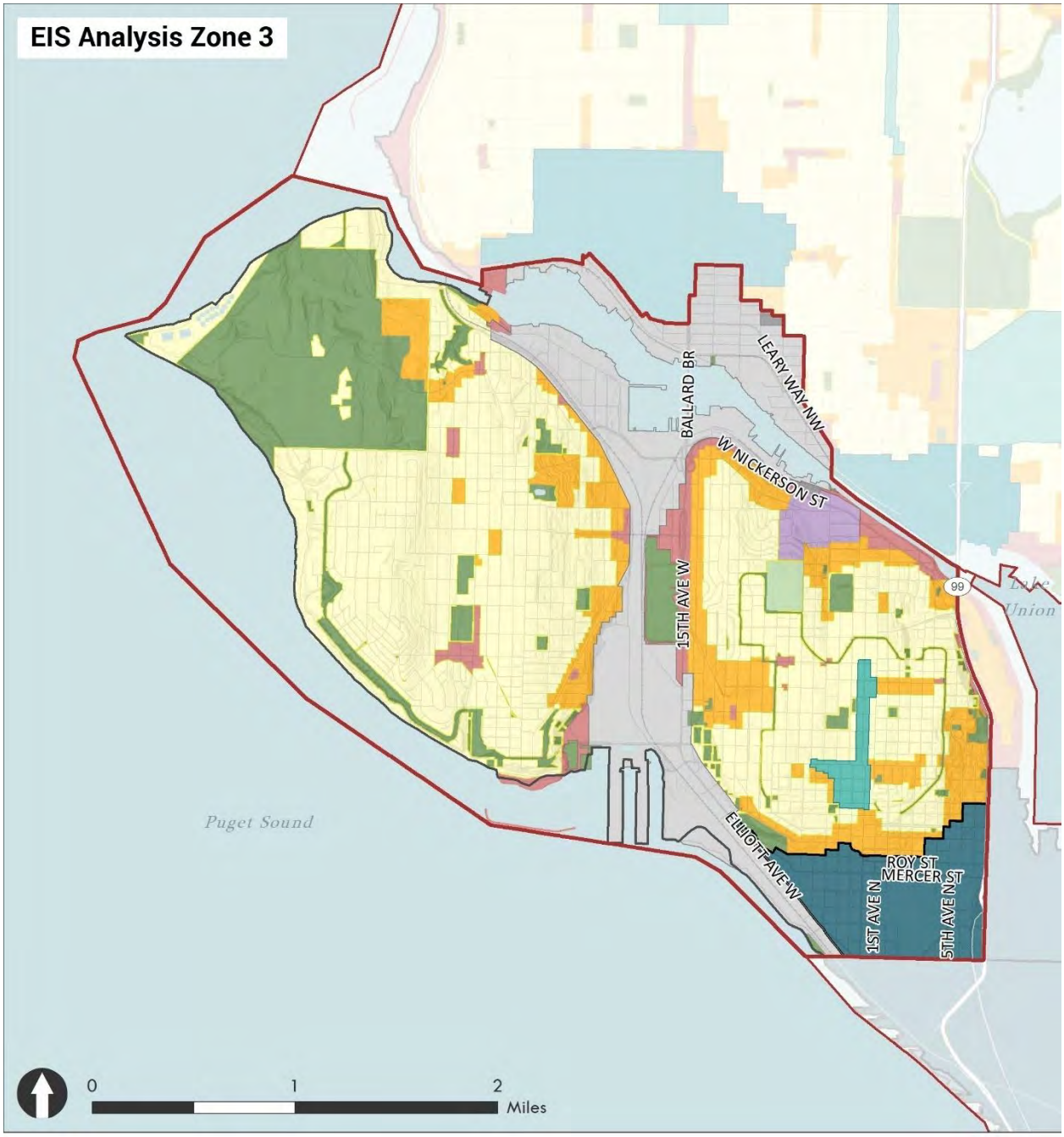
Future Land Use, Zoning, & Shorelines

Area 3 includes the portion of Seattle that is west of State Route 99, north of Denny Way, and south of the Lake Washington Ship Canal as well as the lands in the BINMIC that are north of the Lake Washington Ship Canal. It includes approximately 4,075 acres of buildable lands, or 10% of the buildable lands citywide. In addition to the BINMIC, Area 3 also includes the Uptown Urban Center and the Upper Queen Anne Residential Urban Village.

Topography plays a role in future land use designations within this analysis area. The crest of the Magnolia and Queen Anne neighborhoods support commercial/mixed-use and multi-family residential uses along a primary commercial corridor. Commercial/mixed-use designations are centered at the intersection of 32nd Ave W and W McGraw St in Magnolia, organized along Queen Anne Ave N in Upper Queen Anne Residential Urban Village, and along Mercer St in the Uptown Urban Center. Multi-family residential designations are located at the foot of both hills, lying between the neighborhood residential areas and the industrial uses in the BINMIC. Future land use and zoning acreage within the analysis area are detailed in **Exhibit 3.6-14** and **Exhibit 3.6-16** and mapped in **Exhibit 3.6-38** and **Exhibit 3.6-39**.

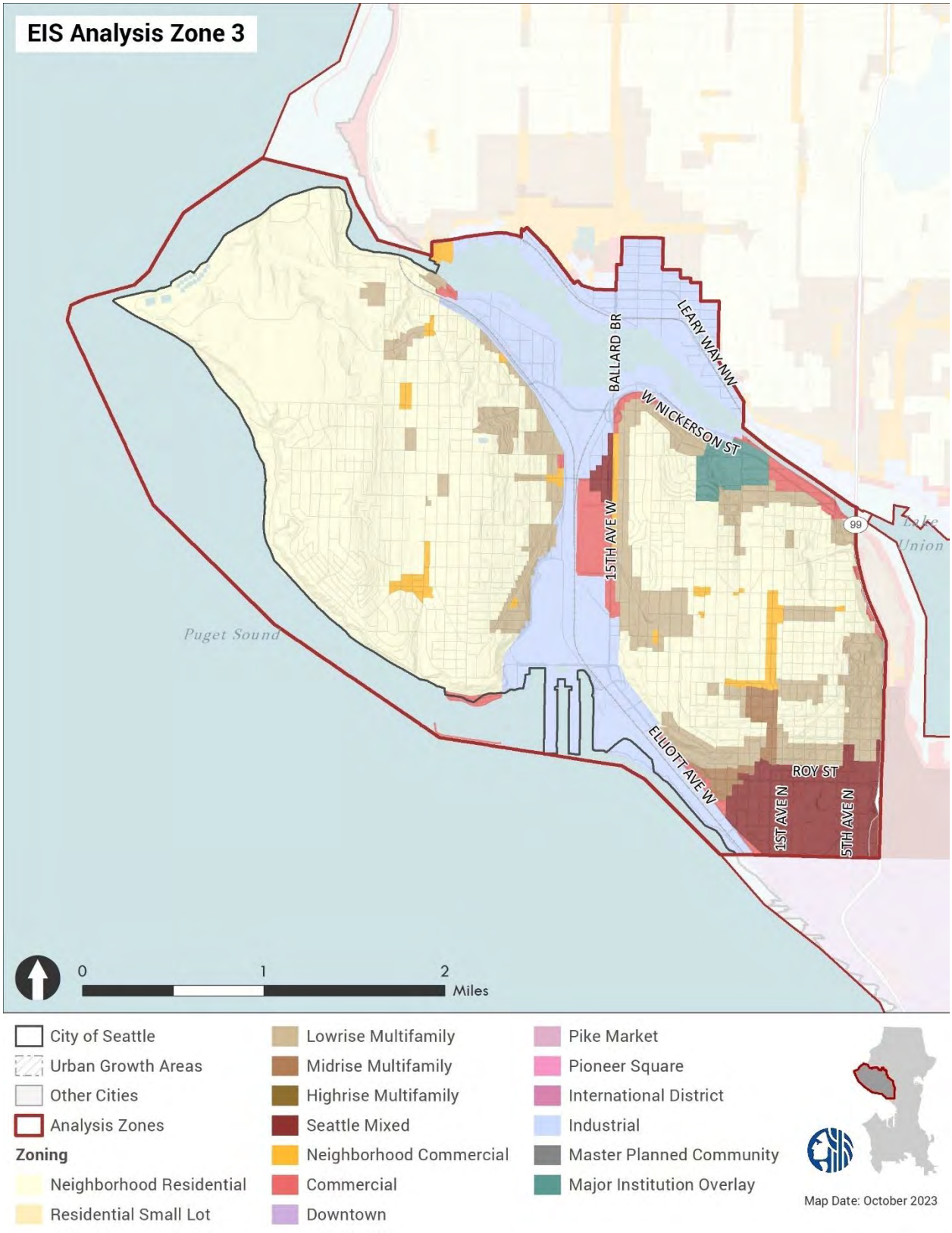
Area 3 includes about 24% of the city's designated shoreline district (1,772 acres). Nearly three-quarters of this area is within a conservancy shoreline environment, including Conservancy Management (10%) east of the Ballard Locks and on both sides of the Smith Cove Waterway, Conservancy Navigation (8%) along the Lake Washington Ship Canal, and a mix of Conservancy Preservation (35%) and Conservancy Recreation (19%) following the shoreline along the Magnolia neighborhood. Another 17% is designated Urban Industrial on the north shore of the Lake Washington Ship Canal and surrounding Smith Cove Waterway and 6% is designated as Urban Maritime near Fisherman's Terminal. Designated shoreline acreage within the analysis area is detailed in **Exhibit 3.6-18** and mapped in **Exhibit 3.6-40**.

Exhibit 3.6-38. Area 3: Queen Anne/Magnolia—Future Land Use Designations



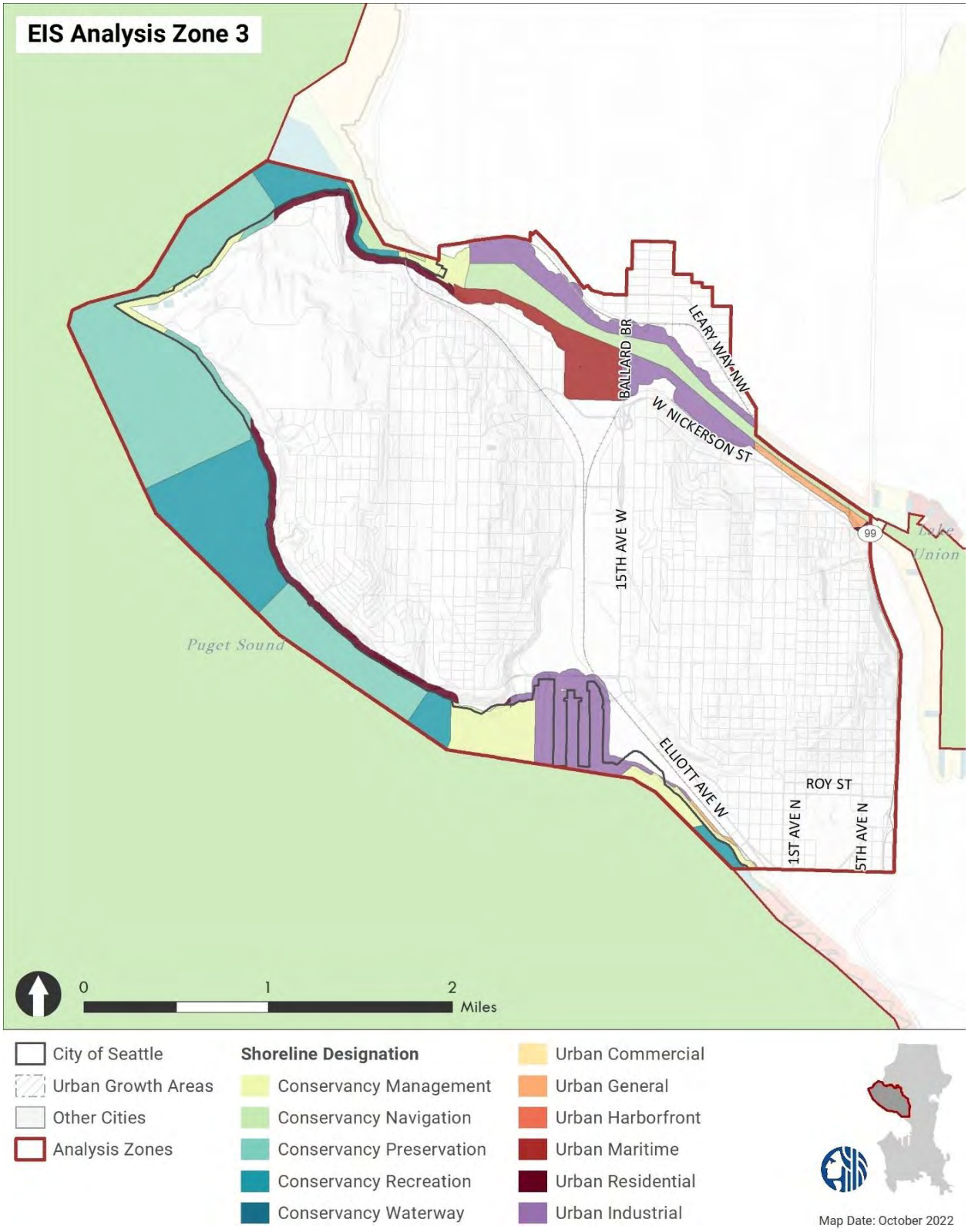
Source: City of Seattle, 2022; BERK, 2023.

Exhibit 3.6-39. Area 3: Queen Anne/Magnolia—Zoning



Source: City of Seattle, 2022; BERK, 2023.

Exhibit 3.6-40. Area 3: Queen Anne/Magnolia—Shoreline Designations



Source: City of Seattle, 2022; BERK, 2022.

Existing Land Use

Existing Uses

The largest existing land use category is single family residential which accounts for 35% of existing uses versus 48% citywide. A higher share of commercial/mixed-use land uses are present in the study area (13%) compared to the 8% citywide. Commercial/mixed-use land uses are centered in the Uptown Urban Center and the Upper Queen Anne Residential Urban Village with a smaller portion allocated in the Magnolia Village along the W McGraw St commercial corridor. Mixed-use buildings in the centers and villages are typically organized around a liner commercial corridor and consist of 4- to 5-story residential buildings with ground floor retail.

Major institutions, public facilities, and utilities account for 12% of the existing uses primarily due to the presence of the BINMIC and Seattle Pacific University. Parks, open space, and cemeteries account for another 20% of the land uses in the analysis area. The largest uses in this category include Discovery Park, Interbay Athletic Complex, Mt. Pleasant Cemetery, and neighborhood parks including David Rodgers, Smith Cove, and Ella Bailey Parks.

Current land use acreage is detailed in **Exhibit 3.6-19** and mapped in **Exhibit 3.6-41**.

Heights

Area 3 has a pocket of taller 5- to 7-story buildings in the Uptown Urban Center and along Queen Anne Avenue. However, most of the area is zoned neighborhood residential and has building heights of 1 to 2 floors.

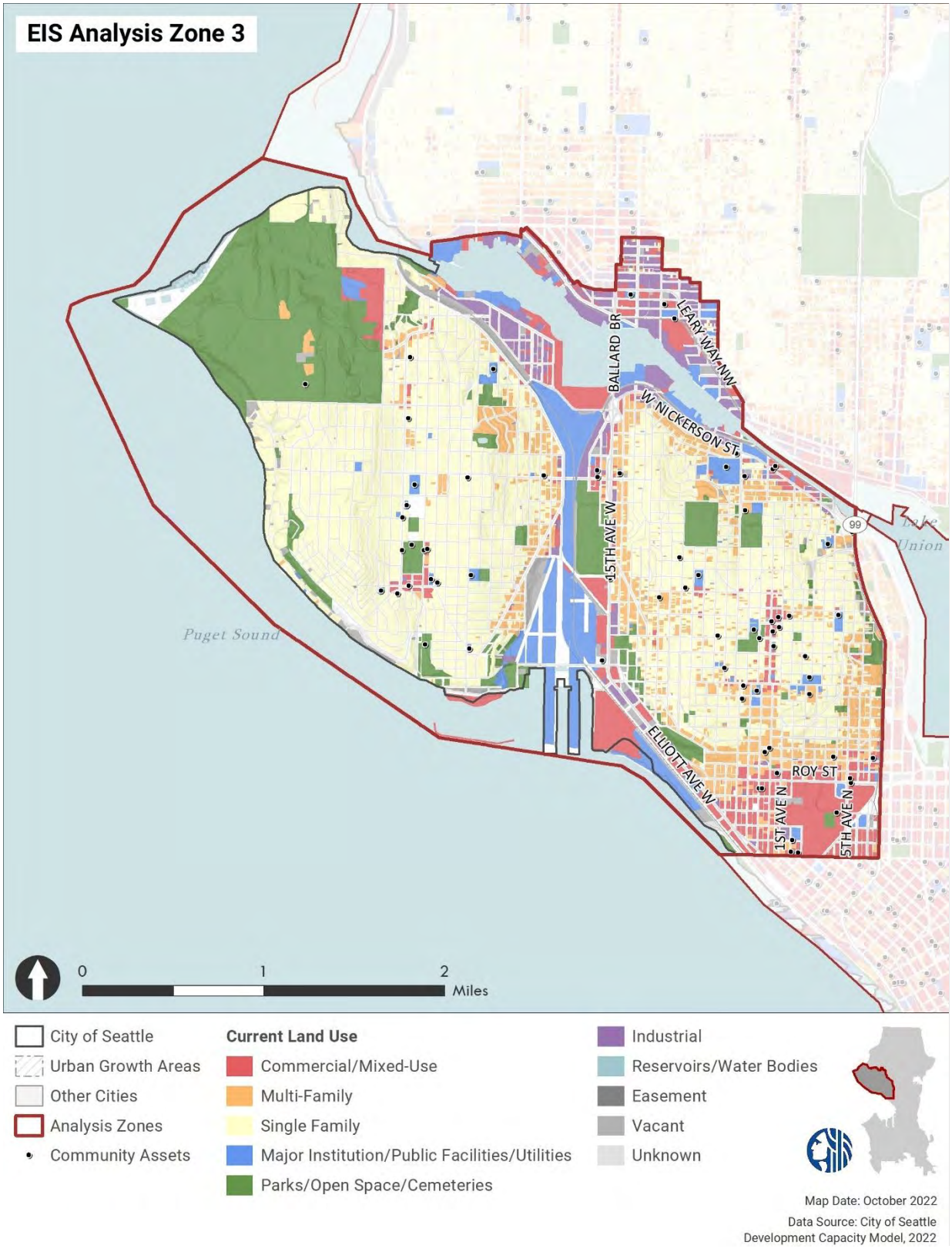
Transitions

The shift from the greater Downtown Urban Center north to lower density residential areas is a major transition in building intensity. However, this is likely to be mitigated by the steep south slope of Queen Anne hill, providing good access to light and views for even low-scale buildings. In Interbay, industrial uses abut residential areas that have seen increasing moderate density housing construction in recent years.

Shadows

The north side of Queen Anne Hill and Magnolia experience a shadier environment because of topography blocking southern sun exposure.

Exhibit 3.6-41. Area 3: Queen Anne/Magnolia—Current Land Use



Source: City of Seattle, 2022; BERK, 2022.

Area 4: Downtown/Lake Union

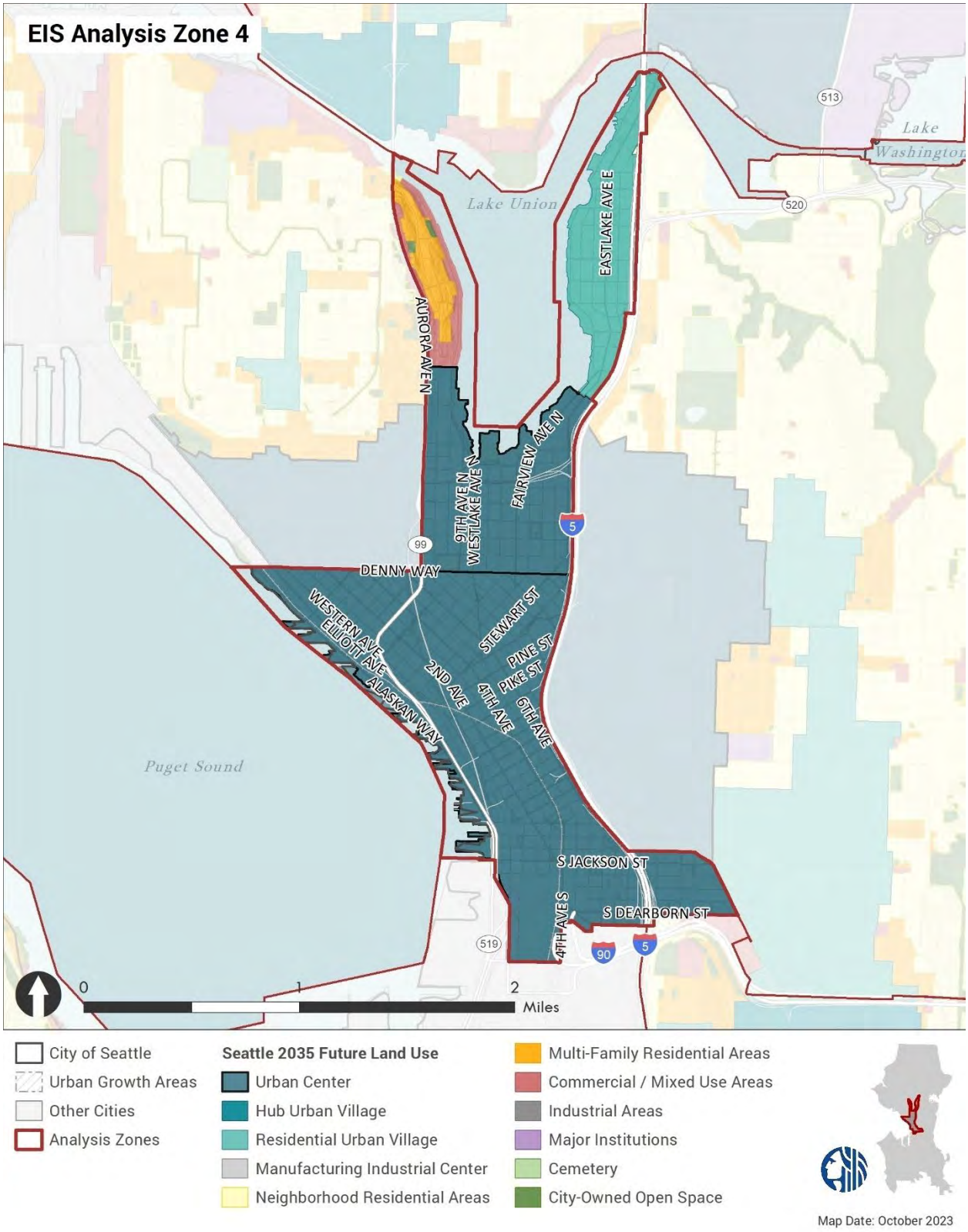
Future Land Use, Zoning, & Shorelines

Analysis Area 4 includes the portion of Seattle east of State Route 99, west of Interstate 5, and north of Interstate 90. The study area is also bounded by its shoreline fronting Elliott Bay and Lake Union. It includes approximately 1,033 acres of buildable lands, or 3% of the buildable lands citywide including the Downtown and South Lake Union Urban Centers and the Eastlake Residential Urban Village.

Four distinct future land use designations are present in the analysis area. The Downtown Urban Center, South Lake Union Urban Centers, and Eastlake Residential Urban Village account for nearly 90% of planned uses. Denny Way separates the Downtown Urban Center from the South Lake Union Urban Center. The remaining commercial/mixed use and multi-family designations are located east of Aurora Ave N and north of Galer Street in the Westlake neighborhood. Commercial/mixed-use designations are concentrated along Westlake Ave N and Aurora Ave N with multi-family residential future land use and zoning designations filling in the intervening areas. Future land use and zoning acreage within the analysis area are detailed in **Exhibit 3.6-14** and **Exhibit 3.6-16** and mapped in **Exhibit 3.6-42** and **Exhibit 3.6-43**.

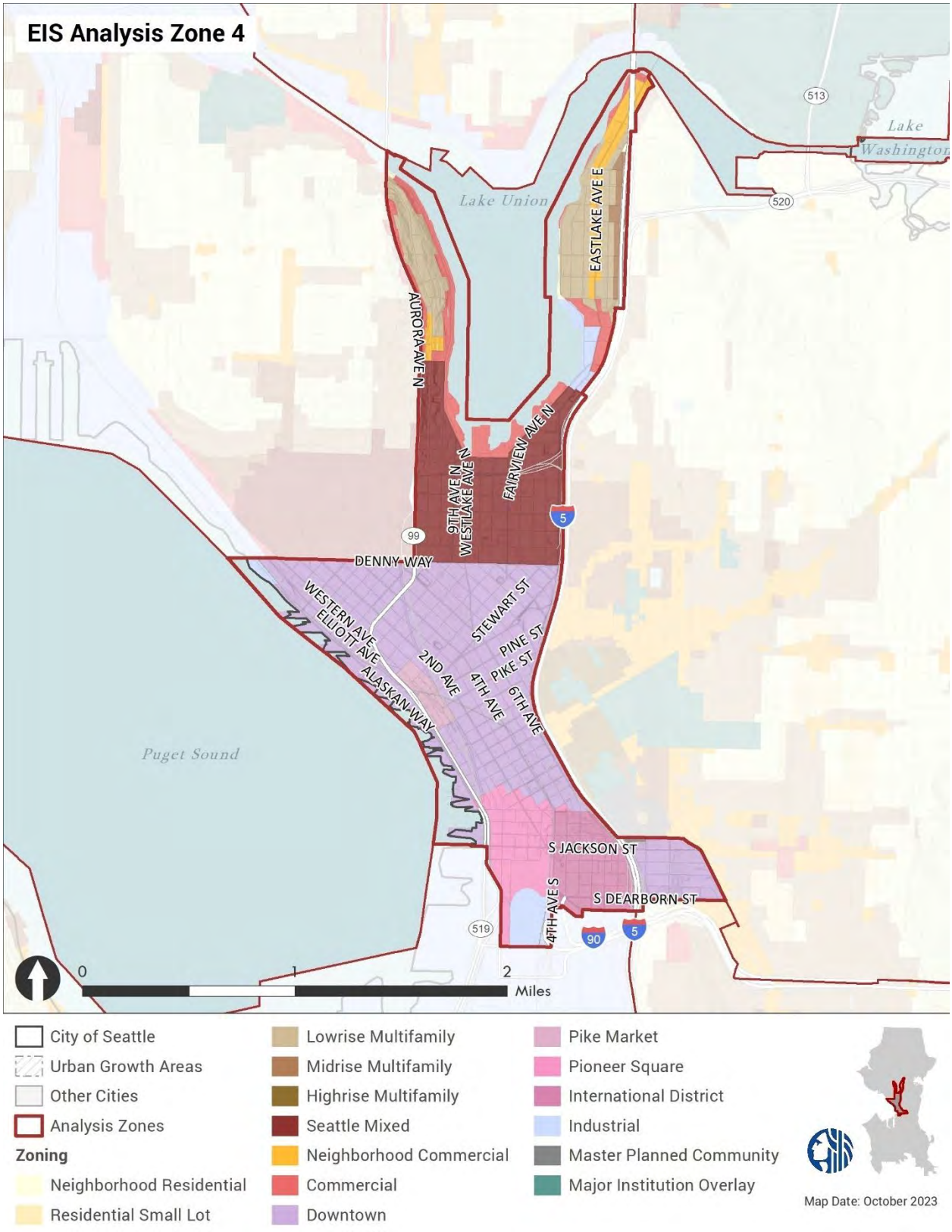
Analysis Area 4 includes about 5% of the city's designated shoreline district (390 acres). Less than 10% of this area is within a conservancy shoreline environment. A majority of the shoreline is designated as Urban including: Urban Commercial (41%) lining a majority of Lake Union from the Aurora Bridge to Lake Union Drydocks, followed by Urban Harborfront (33%) fronting Elliott Bay, Urban Marine (9%) in the southeastern corner of Lake Union, and Urban Residential (7%) on the eastside of Lake Union. Designated shoreline acreage within the analysis area is detailed in **Exhibit 3.6-18** and mapped in **Exhibit 3.6-44**.

Exhibit 3.6-42. Area 4: Downtown/Lake Union—Future Land Use Designations



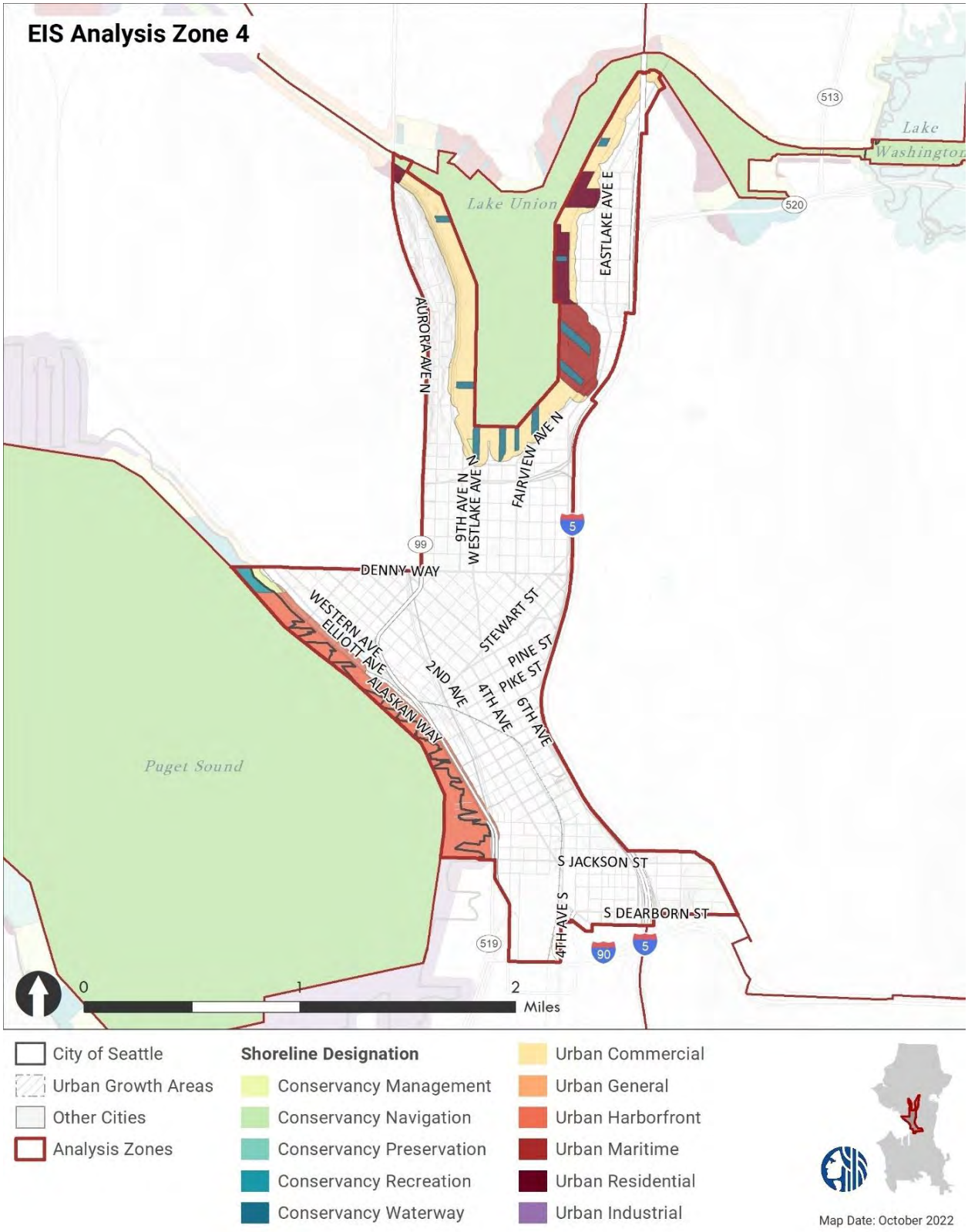
Source: City of Seattle, 2022; BERK, 2023.

Exhibit 3.6-43. Area 4: Downtown/Lake Union—Zoning



Source: City of Seattle, 2022; BERK, 2022.

Exhibit 3.6-44. Area 4: Downtown/Lake Union—Shoreline Designations



Source: City of Seattle, 2022; BERK, 2022.

Existing Land Use

Existing Uses

The largest existing land use category is commercial/mixed-use which accounts for 62.1% of existing uses versus 8.4% citywide. The analysis area includes the commercial and financial center of Seattle and houses its densest and tallest commercial and mixed-use buildings. Commercial/mixed-use land uses are centered in the Downtown and South Lake Union urban centers with a smaller portion of multi-family uses centered in the Belltown and Eastlake neighborhoods. The Eastlake Residential Urban Village has a main commercial corridor along Eastlake Ave E, which is buffered by multi-family and single family uses.

Major institutions, public facilities, and utilities account for 9% of existing uses in the analysis area, including the Seattle City Light Denny Substation, King County Courthouse, Administration and Detention facilities, and the Washington State Convention Center. Parks, open space, and cemeteries account for only 4% of current land uses in the analysis area compared to 14% citywide. The largest uses in this category include Lake Union Park, Denny Park, Cascade Playground, and part of the newly rehabilitated waterfront along Elliot Bay.

Current land use acreage is detailed in **Exhibit 3.6-19** and mapped in **Exhibit 3.6-45**.

General Urban Form

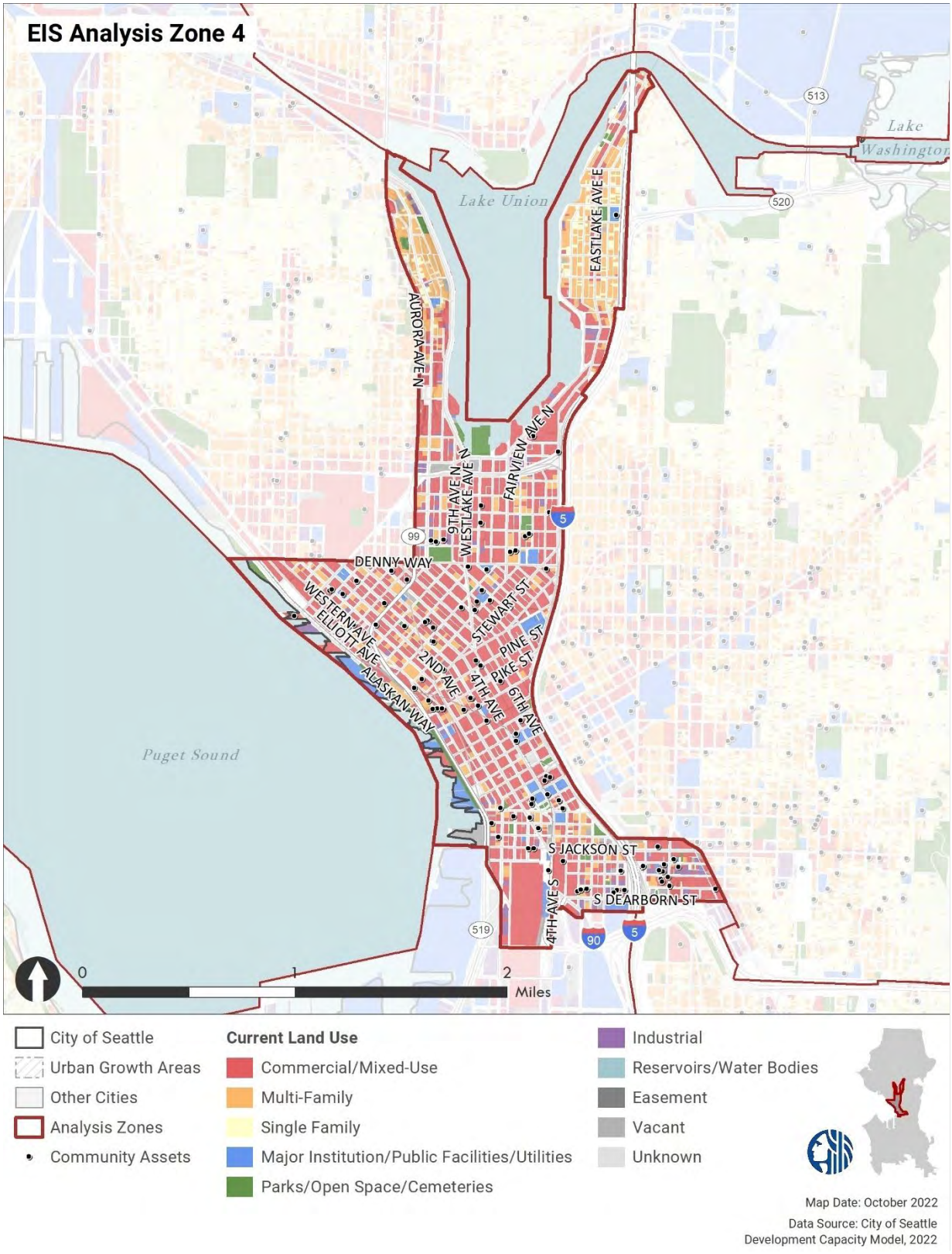
The urban form of Area 4 has deep roots, stretching back to the early days of Euro-American settlement, when settlers with different land claims laid out separate street grids, each oriented to the shoreline along their land claim. Today, most land in the area is heavily built out, and the dense grid of streets creates a well-connected, if automobile-dominated, dense urban environment.

During early settlement, the land claim south of Yesler Way emerged as a lively, diverse, rough-and-tumble neighborhood. Non-White communities were better able to find a foothold here than in other areas and Asian and Black communities established in Pioneer Square but were pushed east to areas that later became Chinatown, Japantown, and Little Saigon, (together Chinatown-International District or "CID") and the Central District.[25]

Chinatown-International District emerged with a unique urban form combining elements of western boomtown urbanism, with large, externally ornamented but internally utilitarian brick buildings replacing wooden structures, and Chinese and Japanese influences in decorative style and internal layout of buildings. Some of these buildings were developed by transcontinental mutual aid societies such as the Kong Yick Investment Company. Many Japanese people lost their homes and businesses in Japantown (bounded by 4th Ave S, S Jackson St, Yesler Way, and then as far east as 23rd Ave) during Japanese internment in the 1940s.

[25] The Forging of a Black Community, Quintard Taylor, 1994

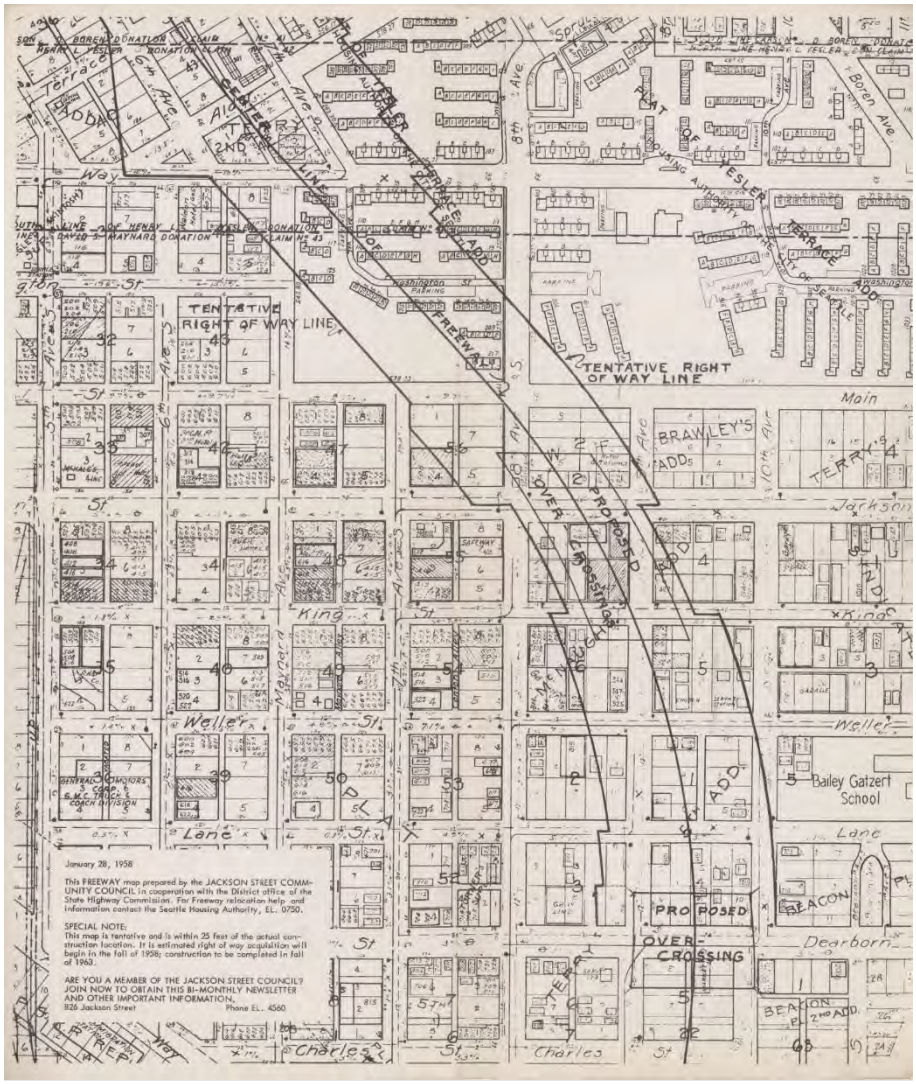
Exhibit 3.6-45. Area 4: Downtown/Lake Union—Current Land Use



Source: City of Seattle, 2022; BERK, 2022.

The area—with complex and changing demographics including Chinese, Japanese, Filipino, Black, and White communities—was significantly altered by the construction of I-5 in the 1960's, which involved the partial or complete demolition of 16 city blocks between Yesler Way and S Dearborn St and created a major sensory barrier between uphill and downhill parts of the neighborhood. Uphill portions of the neighborhood (now known as Little Saigon) were largely redeveloped with lower-density, auto-oriented buildings in the mid-20th century. These became a foothold for Vietnamese immigrant communities beginning in the late 1970's, where investments by Chinese-American and Vietnamese-American property owners and developers helped create a lively shopping district featuring semi-outdoor markets and repurposed strip mall-style buildings. See **Exhibit 3.6-46**, **Exhibit 3.6-47**, and the **Annexation & Regional Transportation Corridors** discussion above.

Exhibit 3.6-46. Proposed Path of I-5 Freeway in Chinatown-International District, 1958



Note: This map was used by the Jackson Street Community Council to raise awareness of businesses and homes that would be displaced by freeway construction.
Source: Wing Luke Museum.

Exhibit 3.6-47. Interstate 5 Construction through Chinatown-International District, 1966

Source: Washington State Archives.

Heights

Area 4 includes the densest area of Seattle, where Belltown, Denny Triangle, South Lake Union, and the Business District have a range of high-rises to skyscrapers. Area 4 also includes Westlake, with 5- to 7-story buildings throughout, and Eastlake, which has a mix of 4- and 5-story buildings, 3-story townhouses, and 2-story houseboats.

Area 5: Capitol Hill/Central District

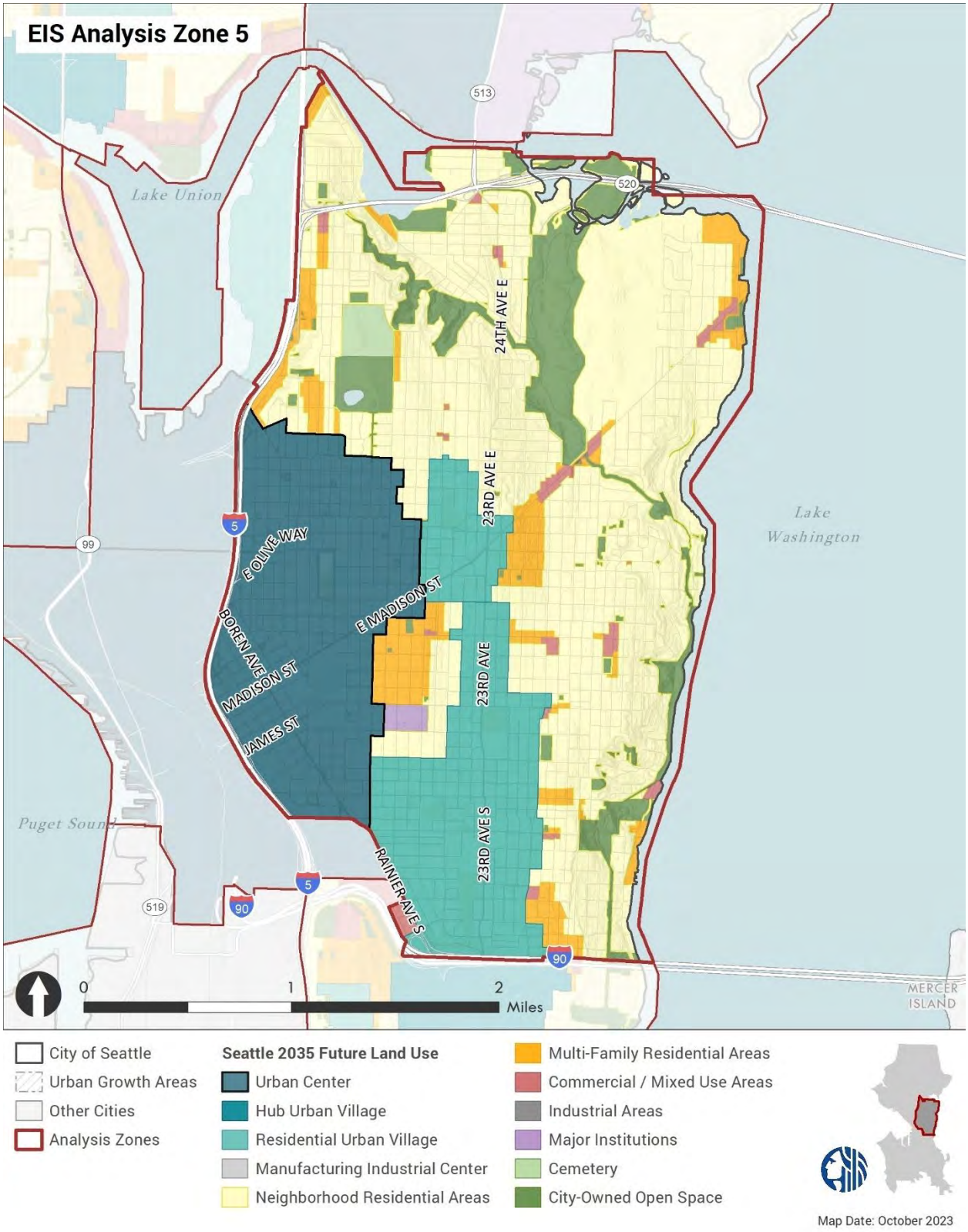
Future Land Use, Zoning, & Shorelines

Area 5 includes the portion of Seattle east of Interstate 5, north of Interstate 90, and south of the Montlake Cut. The analysis area is also bounded by its shoreline fronting Portage Bay and Lake Washington. It includes approximately 3,332 acres of buildable lands or 8% of the buildable lands city wide including the First Hill/Capitol Hill Urban Center and the 23rd & Union-Jackson and Madison-Miller Residential Urban Villages.

The urban center and urban village designations indicate where growth is to be concentrated in the future land use map including the First Hill/Capitol Hill Urban Center and the 23rd & Union-Jackson and Madison-Miller residential urban. Outside of the center and village boundaries, future multi-family residential and commercial/mixed-use areas are also planned along these streets. Seattle University accounts for a small pocket of major institution designation between the First Hill/Capitol Hill Urban Center and the 23rd and Union-Jackson Residential Urban Village. Neighborhood Residential future land use designations fill in the other intervening areas. Future land use and zoning acreage within the analysis area are detailed in **Exhibit 3.6-14** and **Exhibit 3.6-16** and mapped in **Exhibit 3.6-48** and **Exhibit 3.6-49**.

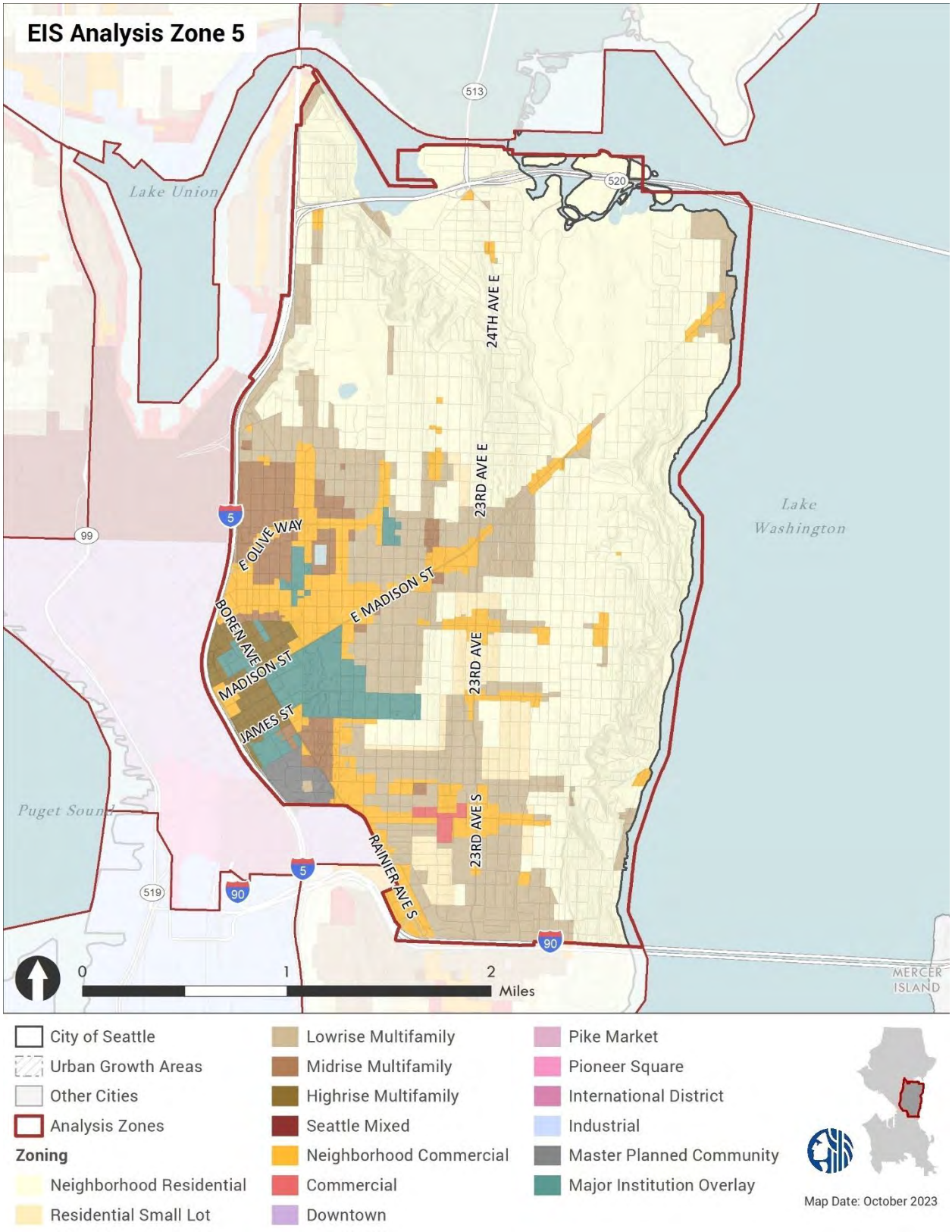
Area 5 includes about 7% of the city's designated shoreline district (513 acres). Nearly three-quarters of this area is within a conservancy shoreline environment, including Conservancy Management (12%) within the inner harbor of Portage Bay, Conservancy Preservation (31%) where Foster Island meets Union Bay, and Conservancy Recreation (32%) along the eastern frontage of the study area along Lake Washington. Another 24% is designated Urban Residential, predominantly along the shoreline of Lake Washington. Designated shoreline acreage within the analysis area is detailed in **Exhibit 3.6-18** and mapped in **Exhibit 3.6-50**.

Exhibit 3.6-48. Area 5: Capitol Hill/Central District—Future Land Use Designations



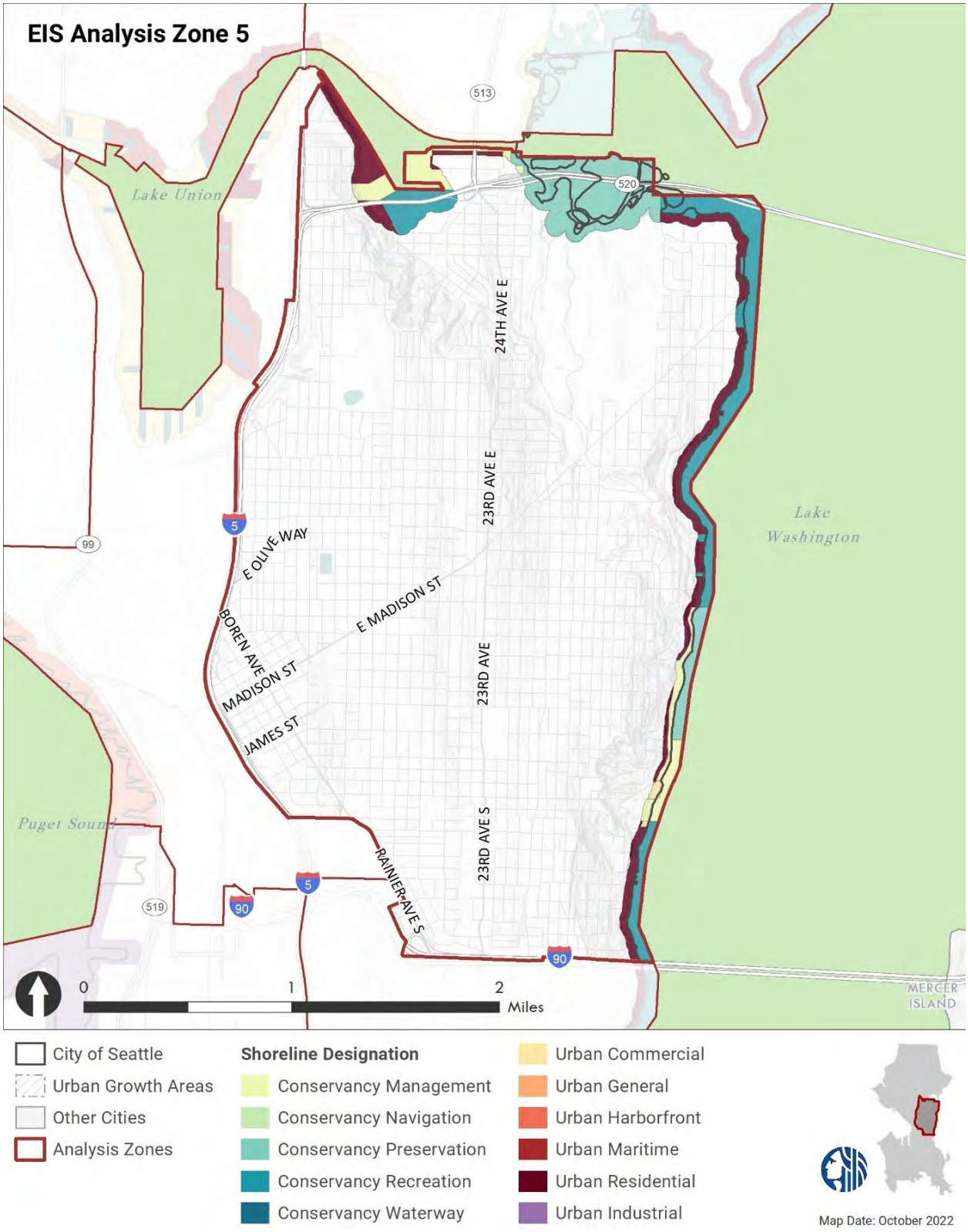
Source: City of Seattle, 2022; BERK, 2023.

Exhibit 3.6-49. Area 5: Capitol Hill/Central District—Zoning



Source: City of Seattle, 2022; BERK, 2023.

Exhibit 3.6-50. Area 5: Capitol Hill/Central District—Shoreline Designations



Source: City of Seattle, 2022; BERK, 2022.

Existing Land Use

Existing Uses

The largest existing land use category is single family residential which accounts for 46% of existing uses versus 48% citywide. Commercial/mixed-use areas are centered in the First Hill/Capitol Hill Urban Center and the 23rd & Union-Jackson and Madison-Miller residential urban villages. Approximately 18% of the analysis area is currently multi-family residential which is slightly more than double the proportion citywide (9%).

Major institutions, public facilities, and utilities account for 7% of the existing land uses in the analysis area. These uses include Seattle University, Seattle Central College, Garfield Highschool, Bailey Gatzert Elementary, Thurgood Marshall Elementary, and the King County Juvenile Detention Center. Parks, open space, and cemeteries account for 18% of the land uses in the analysis area compared to 14% citywide. The largest uses in this category include the Washington Park Arboretum, Volunteer Park, Cal Anderson Park, Frink Park, and Powell Barnett Park.

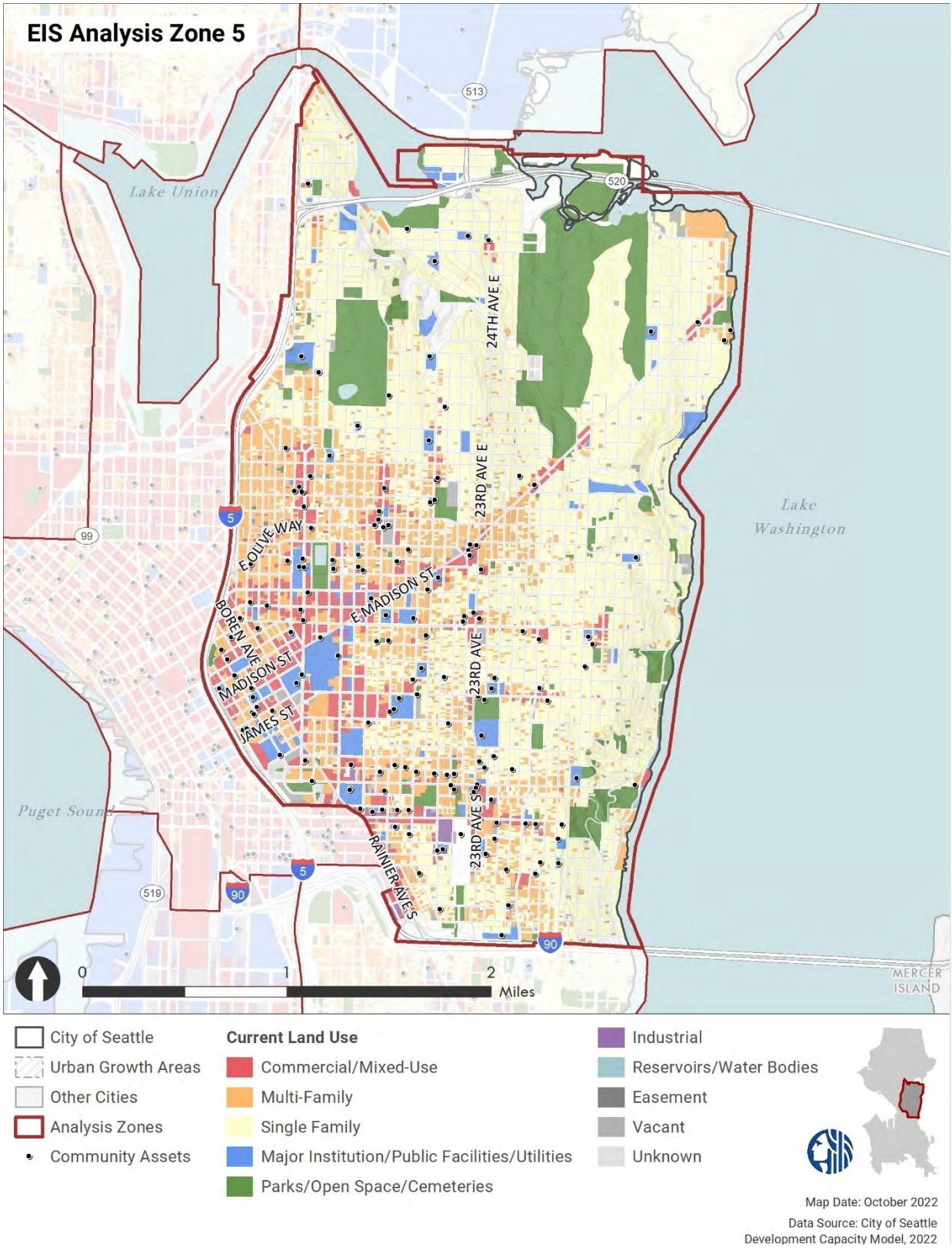
Current land use acreage is detailed in **Exhibit 3.6-19** and mapped in **Exhibit 3.6-51**.

General Urban Form

Area 5 was developed early in Seattle's post-colonial history as the city grew outward from the settlement on Elliott Bay. The well-connected street grid is complemented by organic growth patterns with larger, more intense buildings near downtown scaling gradually down to smaller buildings toward the lake, a pattern which was later locked in place through zoning.

In the twentieth century, the southern portion of the area, generally south of E Madison St and east of 12th Ave, known as the Central Area or Central District was redlined by banks and government institutions, making it nearly impossible for Black residents to live elsewhere in the city (see the **Racially Restrictive Covenants & Zoning Laws** discussion above). This racist practice resulted in high population density with severely limited investment in infrastructure and building stock. Community-supported investments in and construction of vernacular housing, churches, stores, and institutions such as banks still play an important role in the built form of the district, though many have been redeveloped in recent decades. During the late 1980s, construction of the long planned I-90 connection across Lake Washington and through the Central District resulted in the demolition of several blocks of homes and businesses in the Atlantic neighborhood, the southern part of Area 5. This project, long stalled by community advocates who successfully sued under environmental protection laws, ultimately led to the construction of a freeway lid with 15 acres of parkland. Highway construction created a significant gap in the built fabric between the Central District and Rainier Valley and Mount Baker neighborhoods to the south. See **Exhibit 3.6-52** and the **Annexation & Regional Transportation Corridors** discussion above.

Exhibit 3.6-51. Area 5: Capitol Hill/Central District—Current Land Use



Source: City of Seattle, 2022; BERK, 2022.

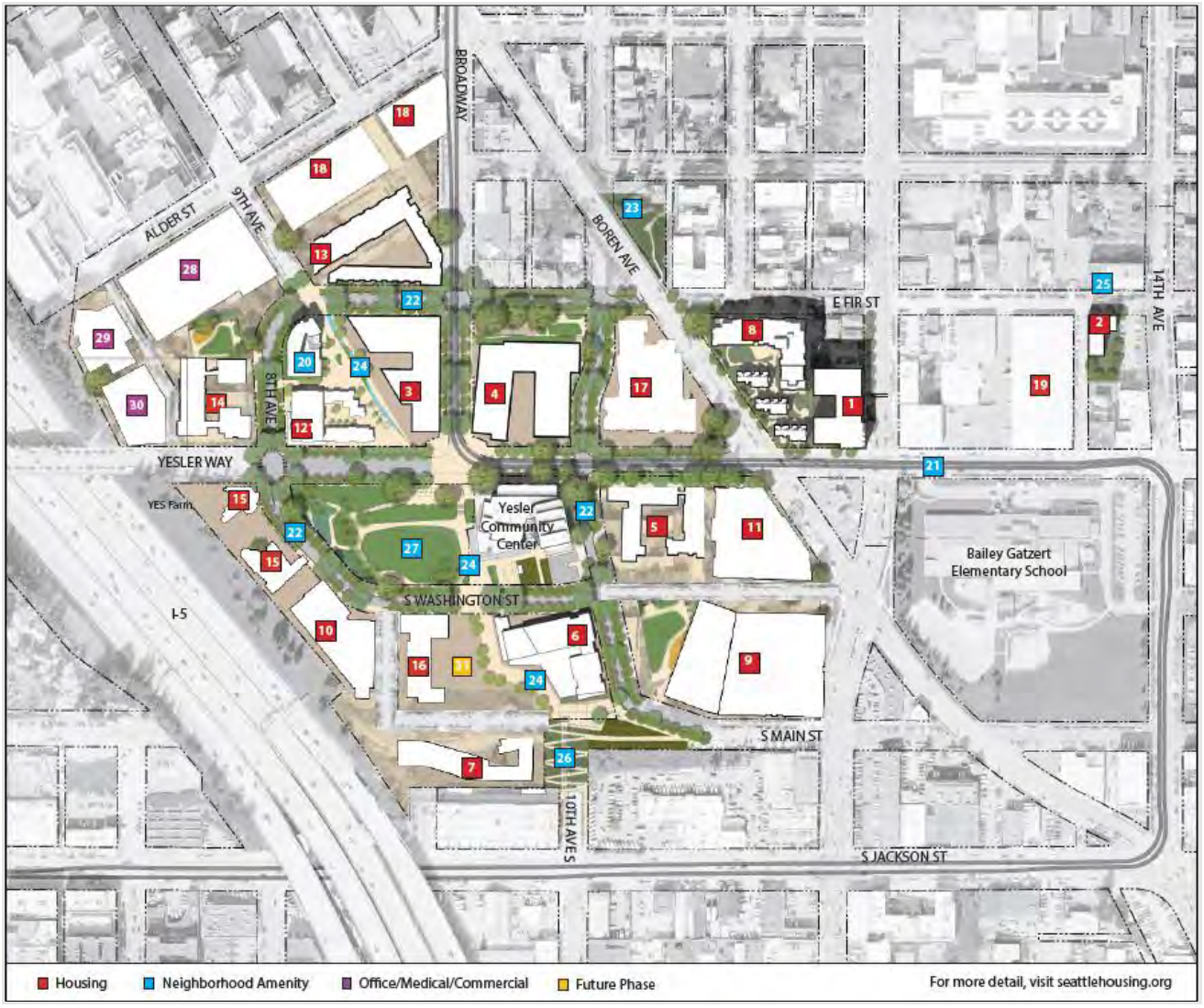
Exhibit 3.6-52. Left: High-Density Vernacular Housing in the Central District Circa 1951. Right: I-90 Immediately After Construction in 1991

Sources: Left: University of Washington Manuscript Division. Right: Nakano Associates.

At the heart of the Central District, a few blocks around 23rd and Union have redeveloped with greater intensity mixed-use development over the last 5 years. An OPCD-led planning effort to establish community-created Central Area Design Guidelines, as well as a Community Roots Housing-led (then Capitol Hill Housing) design process for the Liberty Bank (the first Black-owned bank in the Pacific Northwest) redevelopment, has led to place-based architecture and public art that feels connected to the neighborhood's historical roots as a Black cultural hub.

In 2013, Seattle Housing Authority began redeveloping its 30-acre Yesler Terrace public housing site in the southwestern corner of Area 5. When completed, the new development will have around 5,000 mixed-income units (including a one-for-one replacement of the former subsidized units) as well as a community center, commercial space, parks, and parking. Its design includes view corridors to Mt Rainier and downtown, a trail, transit access, hillclimb to Chinatown-International District, and public art. See **Exhibit 3.6-53**.

Exhibit 3.6-53. Yesler Terrace Redevelopment



Source: Seattle Housing Authority, 2022.

Heights

The tallest buildings in Area 5 are in First Hill, where there are several high-rises. Capitol Hill, Yesler Terrace, and the Central District along 23rd Avenue have many buildings in the 4- to 7-story range. There are 3-story townhouses scattered around the Central District and Judkins Park. However, most of the rest of the area is zoned neighborhood residential and has building heights of 1 to 2 floors.

Transitions

The border between the greater Downtown and First Hill/Capitol Hill urban centers and less intense neighborhoods to the east and northeast is a major transition from greater to lesser intensity.

Area 6: West Seattle

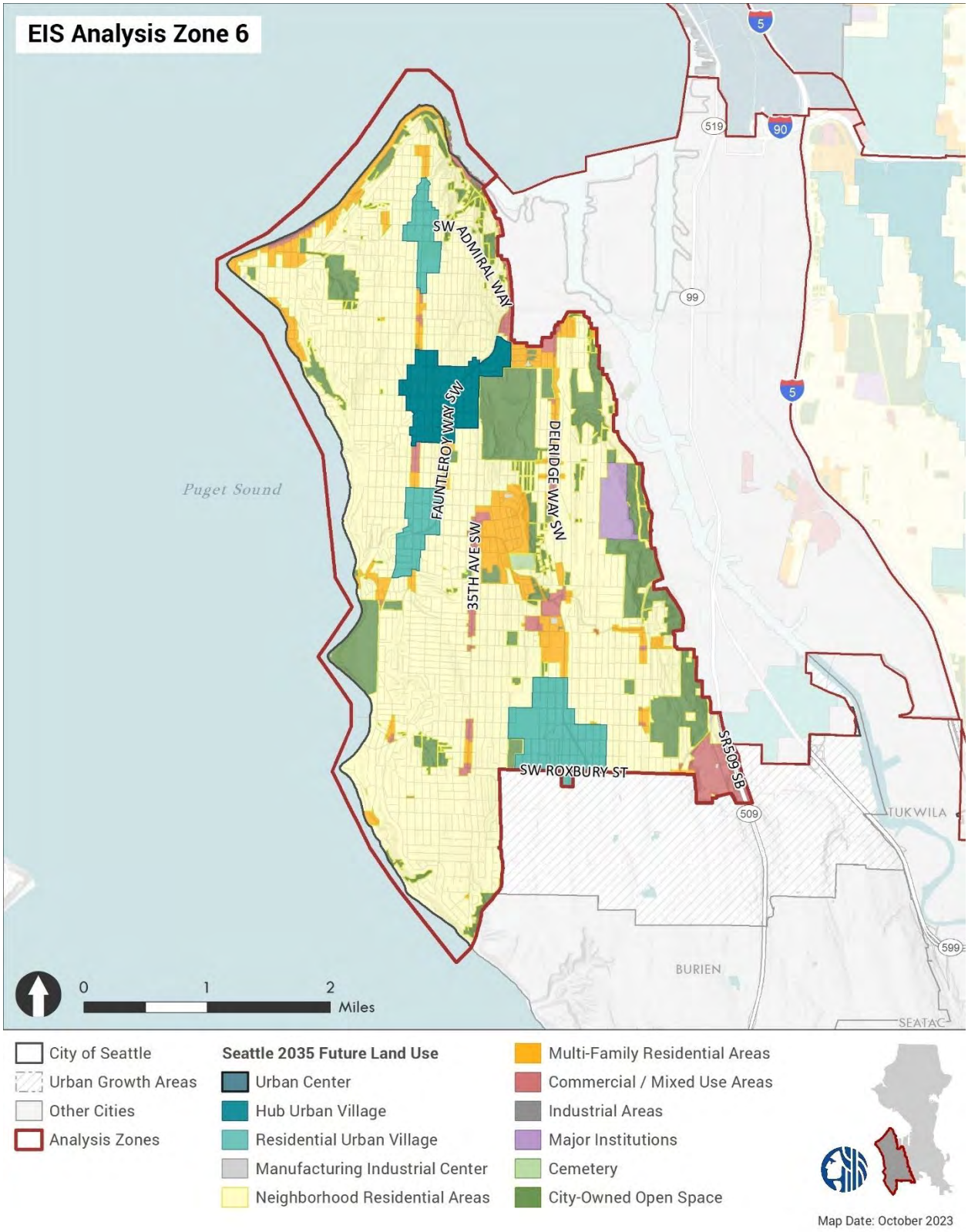
Future Land Use, Zoning, & Shorelines

Area 6 includes the portion of Seattle west of the Duwamish Waterway and State Route 509, north of SW Roxbury St, and is bounded by the Puget Sound at its western and northern extents. It includes approximately 6,411 acres of buildable land, or 16% of the buildable lands city wide. Additionally, Area 6 includes the West Seattle Junction Hub Urban Village as well as the Westwood-Highland Park, Morgan Junction, and Admiral residential urban villages.

About 8% of the analysis area is designated as an urban village. Outside of the urban villages, commercial/mixed-use and multi-family designations generally follow California Ave SW, Alki Ave SW, Delridge Way SW, and Fauntleroy Way SW. Neighborhood residential designations fill in the intervening areas accounting for 63% of future land use designations in the analysis area. Future land use and zoning acreage within the analysis area are detailed in **Exhibit 3.6-14** and **Exhibit 3.6-16** and mapped in **Exhibit 3.6-54** and **Exhibit 3.6-55**.

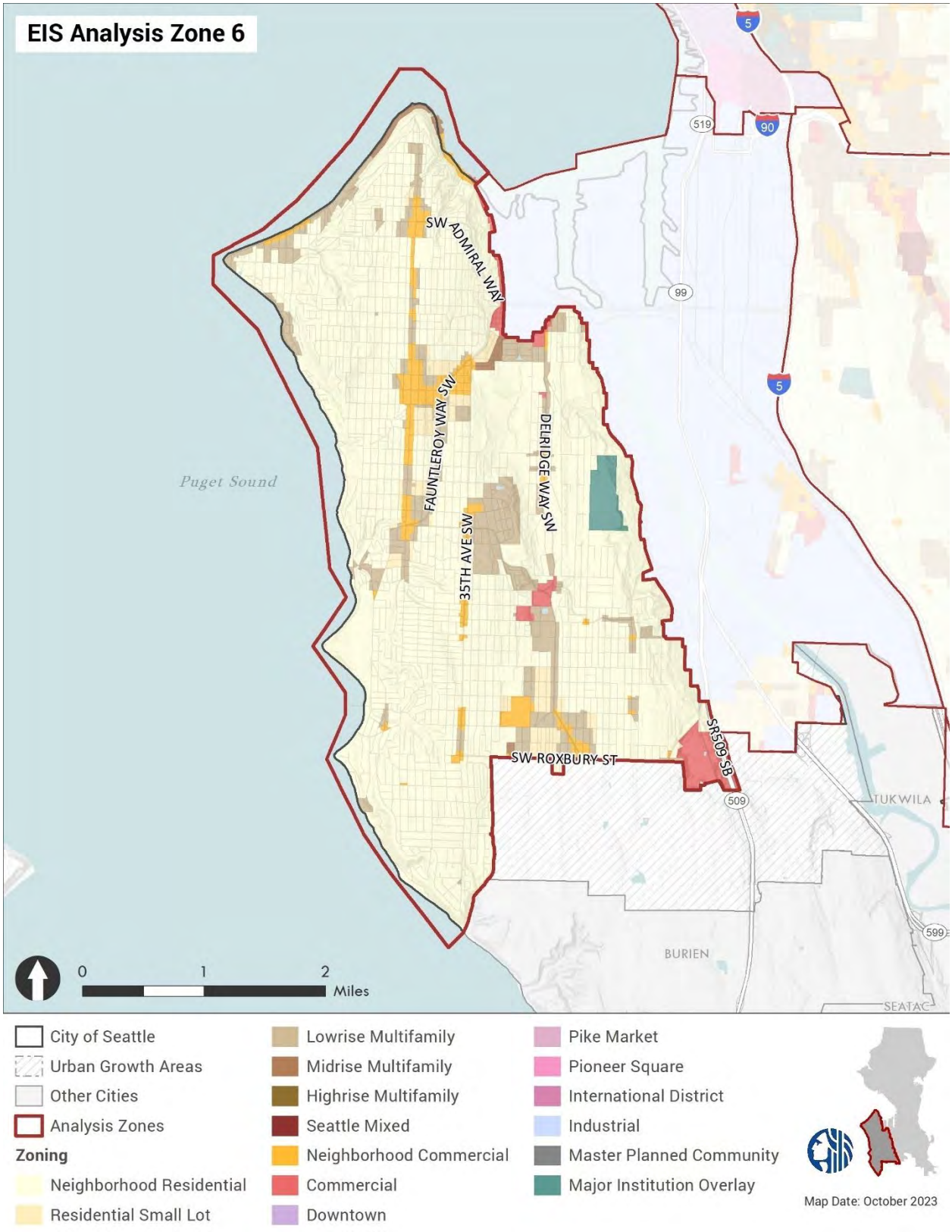
Area 6 includes about 15% of the city's designated shoreline district (1,102 acres). Nearly 85% of this area is within a conservancy shoreline environment, including Conservancy Management (4%) on the northeastern shoreline fronting Elliott Bay, Conservancy Preservation (31%) on the northern edge of Alki Beach and surrounding Lincoln Park, and Conservancy Recreation (50%) on a majority of the eastern shoreline fronting the Puget Sound. Another 15% is designated as Urban Residential infilling between the public lands of Lincoln Park and Alki Beach. Designated shoreline acreage within the analysis area is detailed in **Exhibit 3.6-18** and mapped in **Exhibit 3.6-56**.

Exhibit 3.6-54. Area 6: West Seattle—Future Land Use Designations



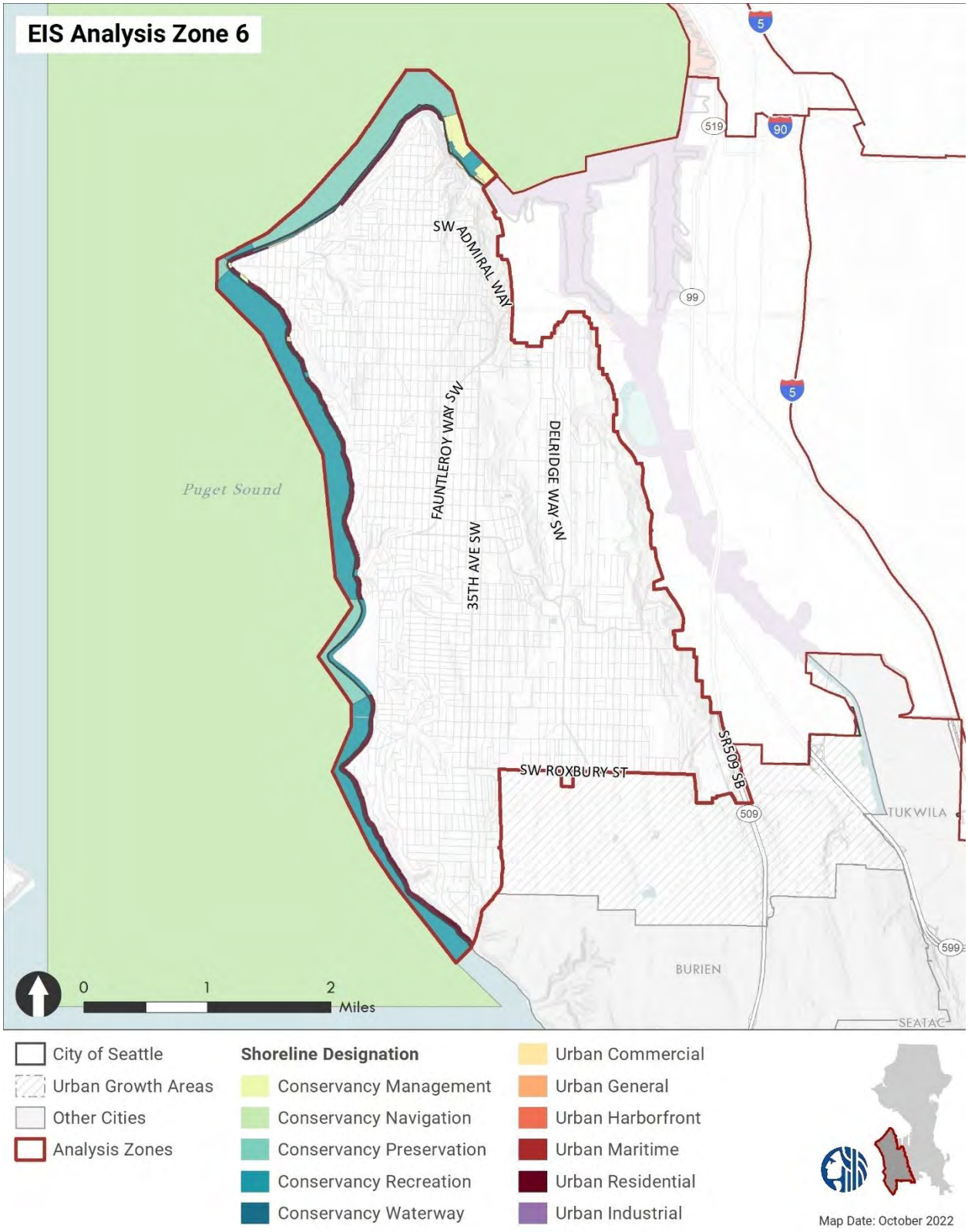
Source: City of Seattle, 2022; BERK, 2023.

Exhibit 3.6-55. Area 6: West Seattle—Zoning



Source: City of Seattle, 2022; BERK, 2023.

Exhibit 3.6-56. Area 6: West Seattle—Shoreline Designations



Source: City of Seattle, 2022; BERK, 2022.

Existing Land Use & Urban Form

Existing Uses

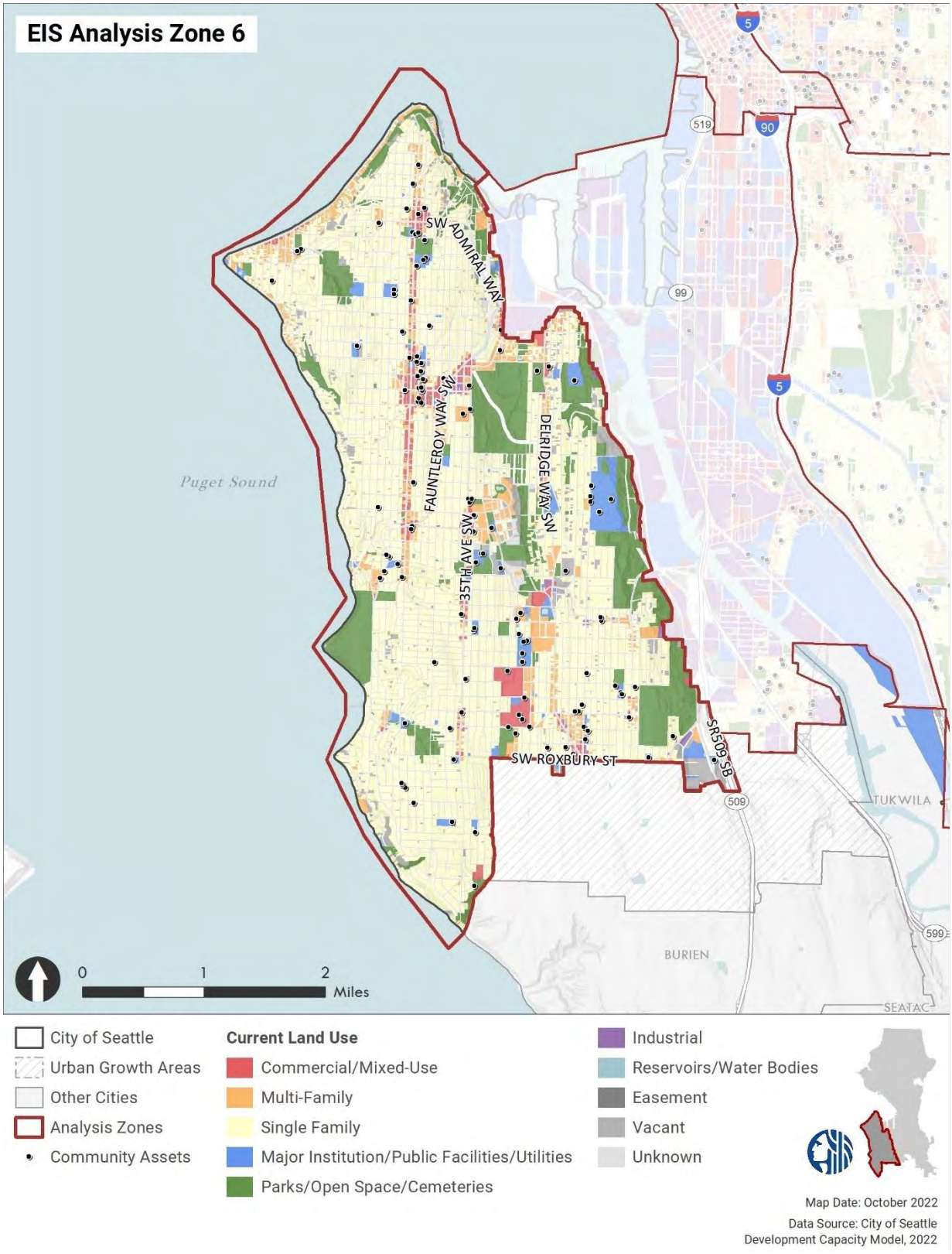
The largest existing land use category is single family residential, which accounts for 59% of the land (versus 48% citywide). Existing commercial/mixed-use and multi-family uses, as well as a majority of the community assets, are located within the existing urban village boundaries oriented along California Ave SW. Commercial/mixed-use land uses found within the urban village boundaries are typically medium-density apartment buildings with ground floor commercial around a main commercial corridor that supports essential neighborhood amenities. California Ave SW still maintains a majority of its historic urban fabric supporting single-story retail uses whereas the Westwood-Highland Park Residential Urban Village is comprised of newer, master-planned big box development. Outside of the urban village boundaries, multi-family development is concentrated around the Alki Beach, Highpoint neighborhoods, and along California Ave SW.

Major institutions and public facilities account for 5% of the existing land uses versus 11% citywide. The largest uses in this category are educational institutions including South Seattle College, Pathfinder K-8 School, Denny International Middle School, Madison Middle School, and West Seattle Highschool. Parks, open space, and cemeteries account for an additional 18% consisting primarily of West Duwamish Greenbelt, West Seattle Golf Course, and Lincoln, Schmitz Preserve, and Fauntleroy Parks.

The share of industrial land uses in the analysis area is lower than the city overall (0.3% versus 5%) and consist primarily of a public storage facility on the southern border of Seattle.

Current land use acreage is detailed in **Exhibit 3.6-19** and mapped in **Exhibit 3.6-57**.

Exhibit 3.6-57. Area 6: West Seattle—Current Land Use



Source: City of Seattle, 2022; BERK, 2022.

General Urban Form

Most of Area 6 was developed in the first half of the twentieth century following streetcar suburb development patterns, featuring commercial and mixed-use main streets surrounded by rectangular lower-density residential blocks. By contrast, in the east part of the area, industrial uses expanded up the Delridge valley from the Duwamish area, notably including the Youngstown steel plant, which attracted workers who settled in the valley. The legacy of mixed industrial commercial and residential uses, relatively dense working-class dwellings, and racial diversity continues to shape the neighborhood's built form.

Heights

The tallest buildings in Area 6 are found in the northern part of the analysis area. Buildings in the West Seattle Junction Hub Urban Village are generally 5- to 7-stories, while buildings in the Admiral and Morgan Junction residential urban villages and along the strip on Alki Beach are 3- to 5-stories. The rest of the analysis area consists mainly of 1- and 2-story buildings.

Transitions

The central location of part of the West Seattle Junction Hub Urban Village at the top of the hill accentuates building height and creates a potential risk for stark transitions in building scale to adjacent low-density residential areas.

Shadows

The West Seattle Junction Urban Village's northeastern portion is in a small valley. Tall, wide buildings combined with slopes to the south and west create abundant shade during winter months.

Area 7: Duwamish

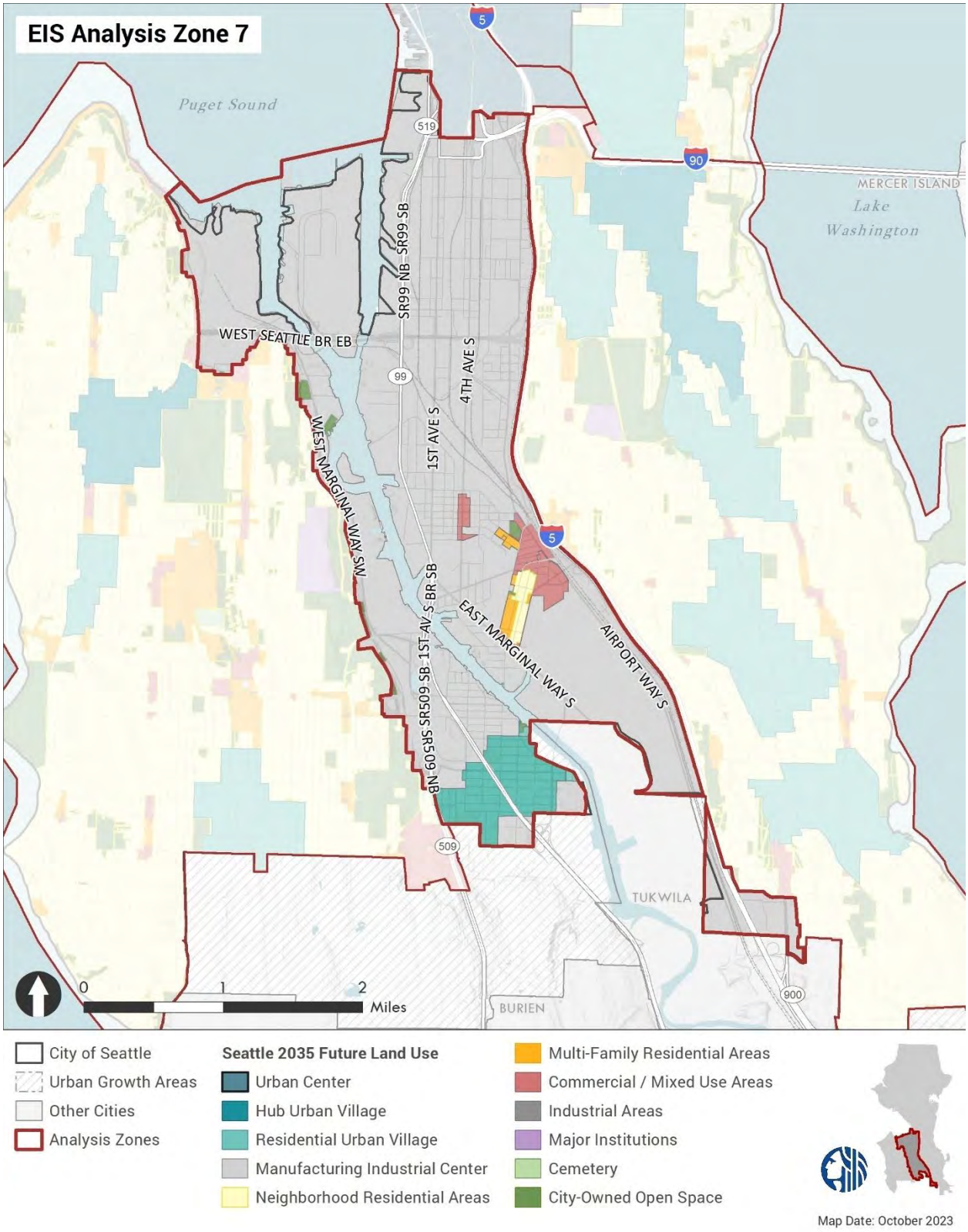
Future Land Use, Zoning, & Shorelines

Area 7 includes a portion of Seattle bordering the Duwamish Waterway west of Interstate 5, east of W Marginal Way SW, sharing its northern boundary with the Elliott Bay. It includes approximately 4,056 acres of buildable land, or 10% of buildable lands citywide. Additionally, Area 7 includes the South Park Residential Urban Village and the Greater Duwamish MIC.

Nearly 92% of Area 7 is designated as a manufacturing industrial center on the future land use map. The remainder is allocated towards the South Park Urban Village at the southeastern corner of the analysis area, and the residential/commercial mix around the Van Asselt neighborhood in Georgetown. Future land use and zoning acreage within the analysis area are detailed in **Exhibit 3.6-14** and **Exhibit 3.6-16** and mapped **Exhibit 3.6-58** and **Exhibit 3.6-59**.

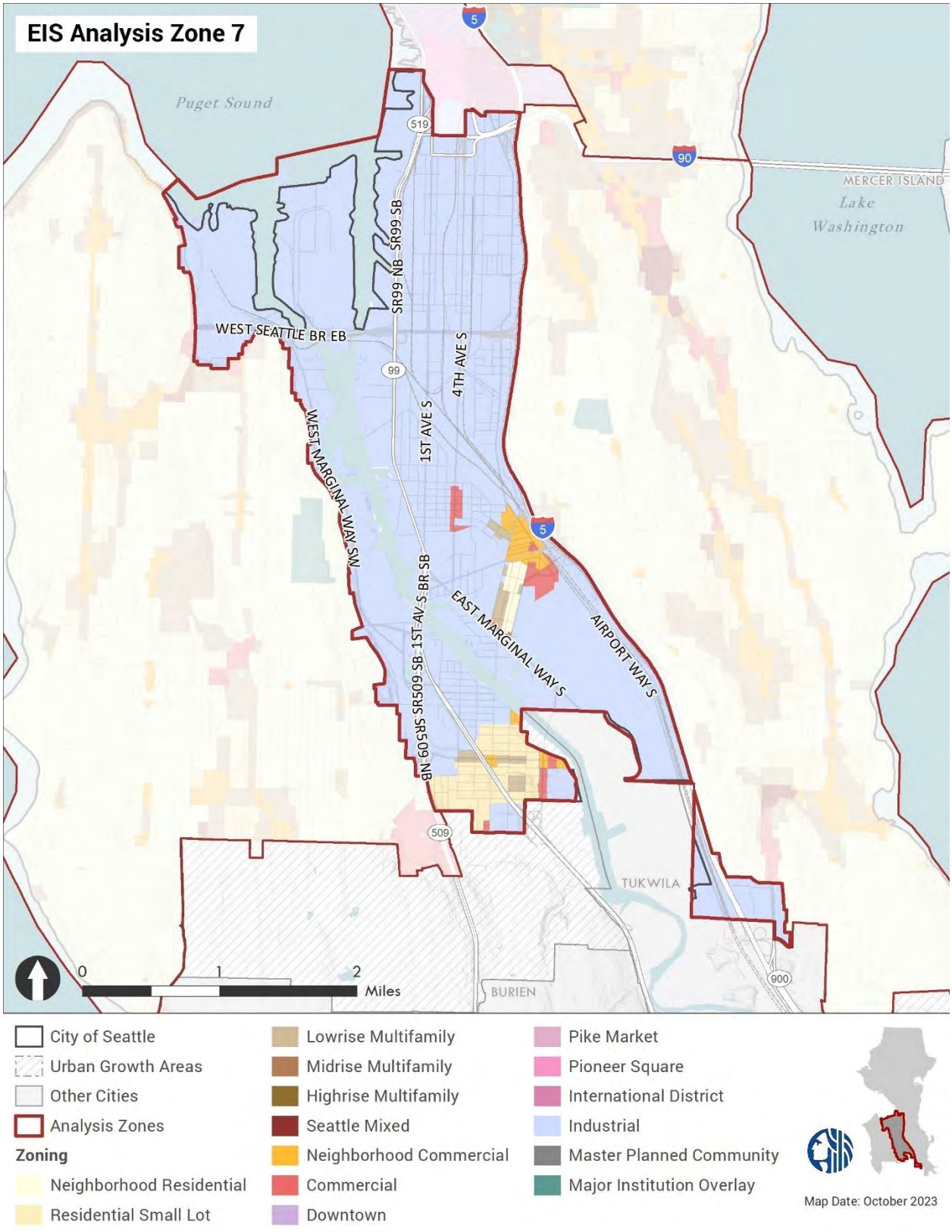
Area 7 includes about 16% of the city's designated shoreline district (1,185 acres). Nearly 95% of this area is within the Urban Industrial designation surrounding Harbor Island and spanning both side of the shoreline along the Duwamish Waterway. The reminder is within the Conservancy Preservation designation on the western shoreline adjacent to Kellogg Island. Designated shoreline acreage within the analysis area is detailed in **Exhibit 3.6-18** and mapped in **Exhibit 3.6-60**.

Exhibit 3.6-58. Area 7: Duwamish—Future Land Use Designations



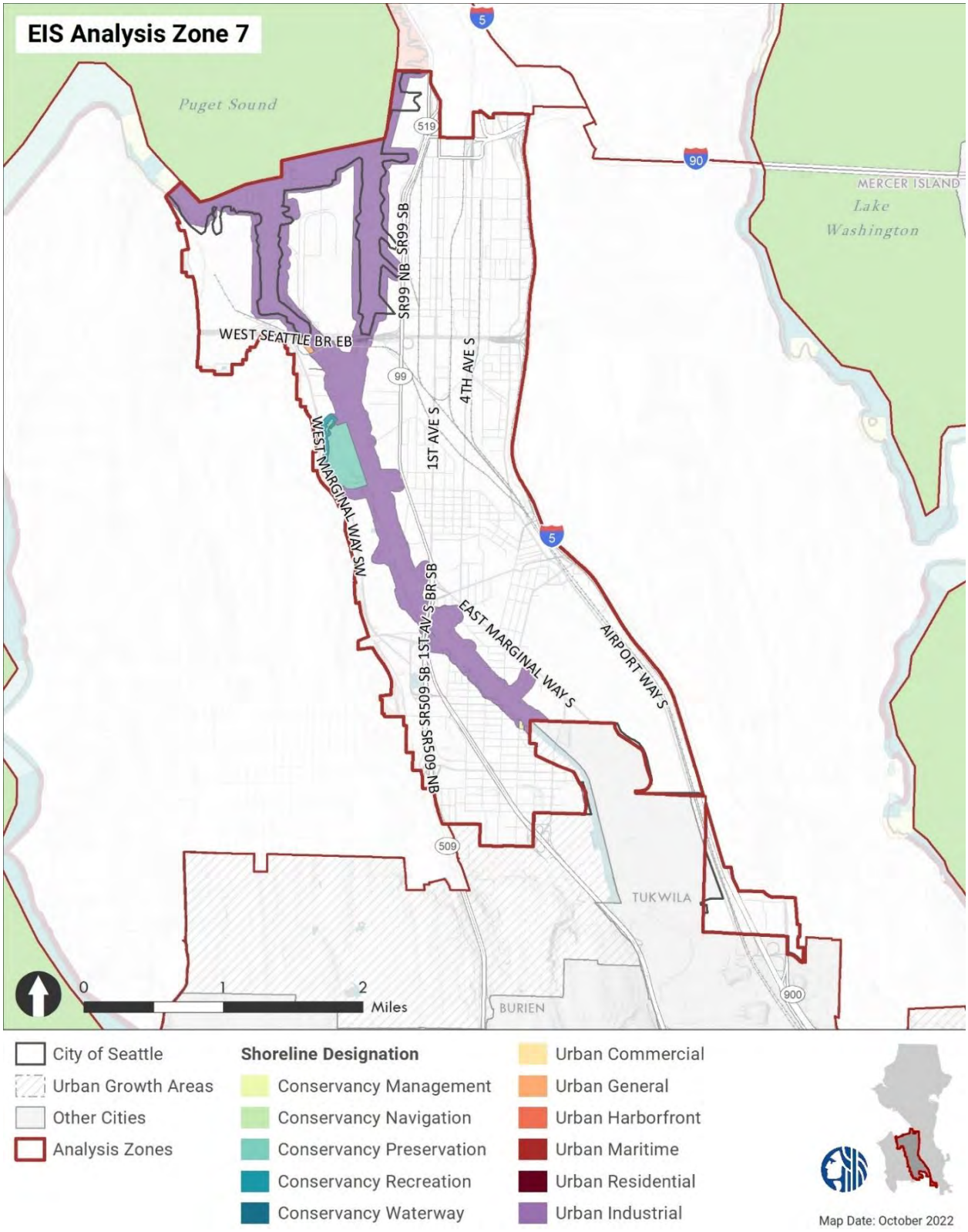
Source: City of Seattle, 2022; BERK, 2023.

Exhibit 3.6-59. Area 7: Duwamish—Zoning



Source: City of Seattle, 2022; BERK, 2023.

Exhibit 3.6-60. Area 7: Duwamish—Shoreline Designations



Source: City of Seattle, 2022; BERK, 2022.

Existing Land Use & Urban Form

Existing Uses

The largest existing land use category within Area 7 is industrial, which accounts for 37% of the land (versus 5% citywide). The analysis area contains the entirety of the Greater Duwamish Manufacturing Industrial Center and supports the Port of Seattle's primary marine shipping area. Vacant land accounts for nearly 14% of the land use as compared to 5% citywide. This is largely because of unbuildable land adjacent to railway corridors running throughout the analysis area and parcels paved for staging and storage uses including the First Study Bus Yard.

Existing commercial/mixed-use land uses account for 7% of existing land uses in the analysis area. These are located throughout the analysis area as a result of specific commercial uses currently allowed in industrial zoned areas of the city. Commercial/mixed use land uses found in the South Park Residential Urban Village follow a more traditional pattern—these are spatially organized along 14th Ave S and support at-grade commercial uses. In comparison, commercial/mixed use land use located throughout the MIC are not organized by any spatial logic and support a variety of more intense and less pedestrian friendly uses such as auto dealerships and wholesale retailers.

Major institutions and public facilities account for an additional 35% of existing uses consisting primarily of Port of Seattle, King County International Airport, and Sound Transit properties. Parks, open space, and cemeteries account for only 1% of existing land uses, primarily attributed to the Georgetown and South Park Playfields as well as Marra-Desimone Park. This is the lowest allocation of parks, open space, and cemetery uses across the eight analysis areas.

Single family and multi-family uses account for 5% of the existing land use, centered exclusively within the South Park Residential Urban Village and the Van Asselt neighborhood.

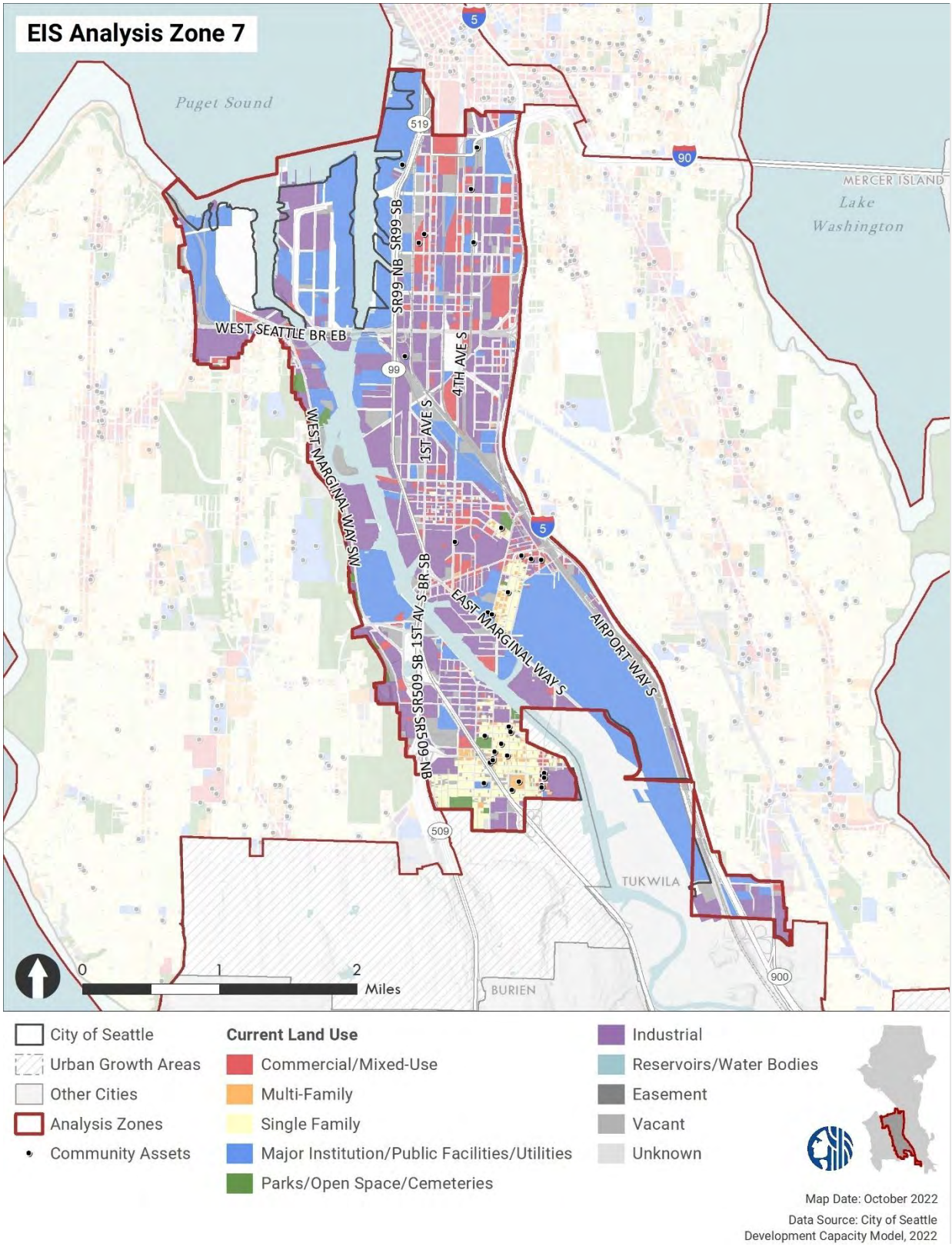
Current land use acreage is detailed in **Exhibit 3.6-19** and mapped in **Exhibit 3.6-61**.

General Urban Form

Area 7 is almost entirely composed of land that was formerly part of the Duwamish River floodplain and tidal flats. This was a rich, constantly shifting landscape with abundant plant and animal life that was essential to the lifeways of the Duwamish people, who lived in villages near the water.

During the first century of Seattle settlement, American settlers gradually straightened, dredged, hardened, and diverted the river and filled in tide flats to create developable land near the harbor (see the **Overview of Historical Planning & Land Use Decisions** discussion above). Changes to the river initially unlocked agriculture in the rich alluvial soils of the valley surrounding the small agricultural/industrial towns of Georgetown and South Park. Industrial growth spread southwards from Seattle, converting the large open parcels of farmland to industrial uses, and leaving these two neighborhoods isolated in a largely industrial landscape with near total hardscape coverage and large, freight-oriented roadways.

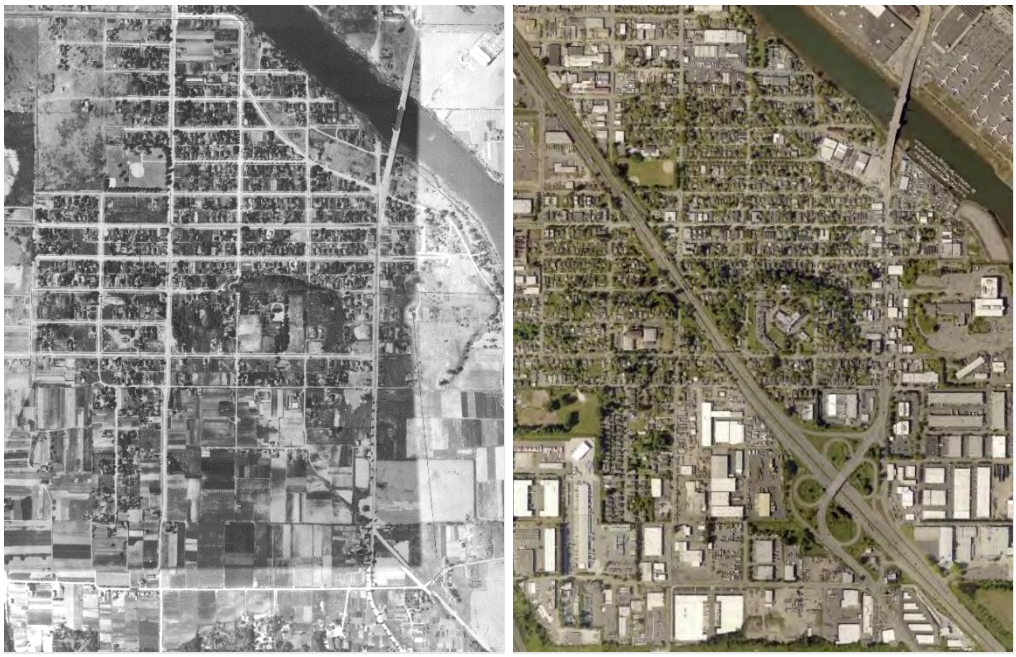
Exhibit 3.6-61. Area 7: Duwamish—Current Land Use



Source: City of Seattle, 2022; BERK, 2022.

Development of Highway 99 and I-5 through the neighborhoods resulted in demolition of existing homes and businesses and created physical and sensory barriers within the neighborhoods. In 2023, the community group Reconnect South Park was awarded $1.6 million to study removing part of Highway 99 to reconnect the neighborhood. See **Exhibit 3.6-62** and the **Annexation & Regional Transportation Corridors** discussion above.

Exhibit 3.6-62. Left: Aerial View of South Park in 1936. Right: Aerial View of South Park in 2021



Sources: Left: King County Public Works; Right: Eagleview Technologies © 2022

Heights

Area 7 consists mainly of 1- and 2-story buildings although zoning currently allows taller buildings.

Transitions

In general, potential transition impacts in Area 7 are limited due to nearly uniform industrial zoning and geographic barriers like I-5 and the Duwamish Waterway. Two exceptions to this are the South Park and Georgetown neighborhoods, which are surrounded by industrial zoning and currently exhibit a stark contrast in lot and building size between residential and industrial areas. Elements like street trees, sidewalks, and small public parks help to soften these transitions. Steep forested slopes and major roadways to the east and west of Area 7 generally provide ample buffers between industrial areas and residential areas in Beacon Hill and West Seattle. However, industrial uses intrude into north Delridge in an area where median household income is lower than the citywide median.[26]

[26] Median household income in Census tract 99 (which includes North Delridge) was $86,663 versus the citywide median of $105,391 in 2021. Source: American Community Survey 5-Year Estimates (2017-2021): S1901 Income in the past 12 months (in 2021 inflation-adjusted dollars).

Area 8: SE Seattle

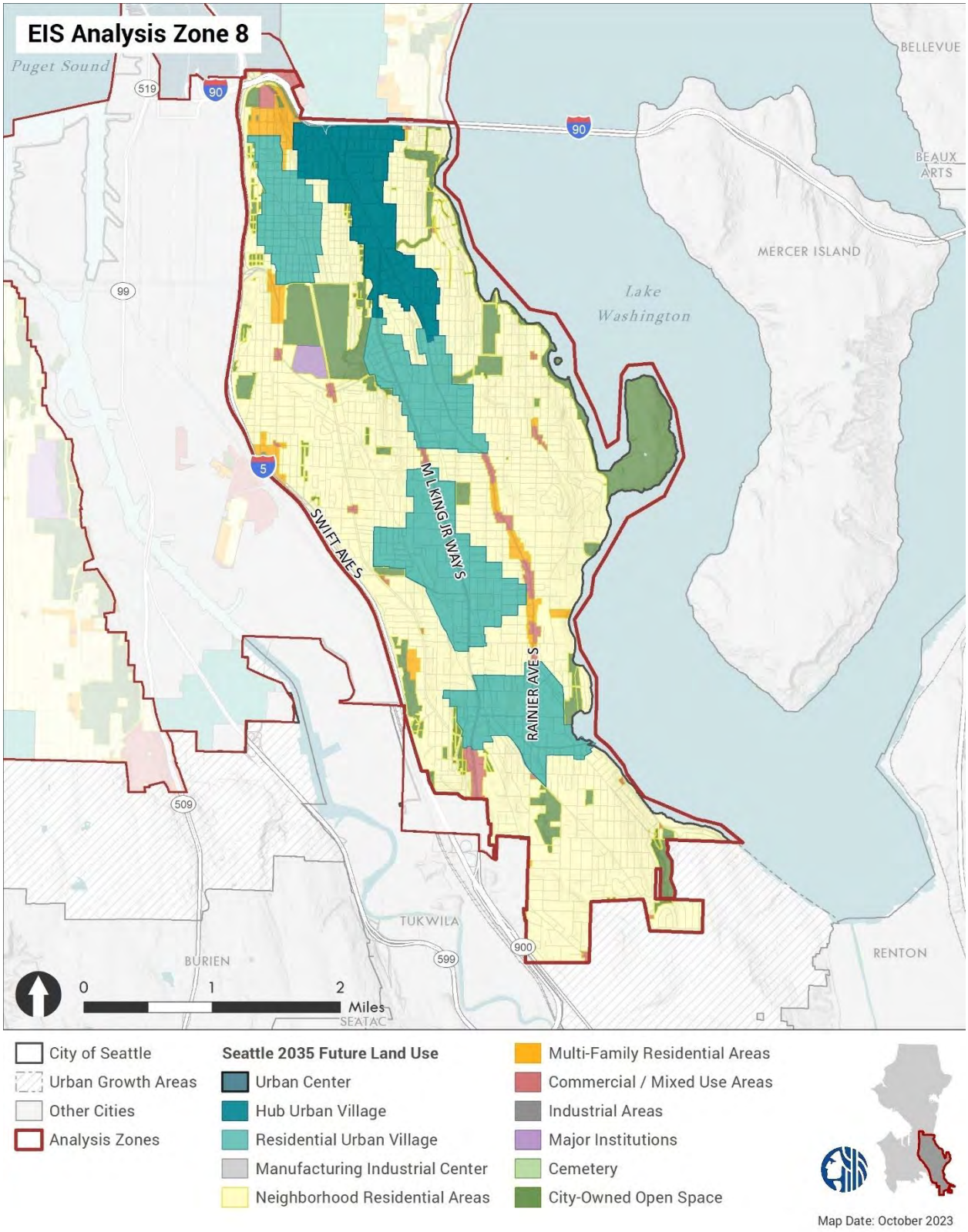
Future Land Use, Zoning, & Shorelines

Area 8 includes the portion of Seattle east of Interstate 5, south of Interstate 90, and shares its eastern frontage with Lake Washington. It includes approximately 5,656 acres of buildable land, or 14% of the buildable land citywide. Additionally, the analysis area includes the Mt Baker Hub Urban Village and the North Beacon Hill, Columbia City, Othello, and Rainier Beach Residential Urban Villages. Nearly 23% of Area 8 is designated as either a residential or hub urban village.

Outside of these urban village boundaries, a majority of the commercial/mixed-use and multi-family future land use and zoning designations are concentrated adjacent to major arterials running between urban village boundaries. Outside of the urban villages, commercial/mixed-use and multi-family designations generally follow Beacon Ave S, Rainier Ave S, and MLK Jr Way S. Neighborhood residential designations fill in the intervening areas. Future land use and zoning acreage within the analysis area are detailed in **Exhibit 3.6-14** and **Exhibit 3.6-16** and mapped in **Exhibit 3.6-63** and **Exhibit 3.6-64**.

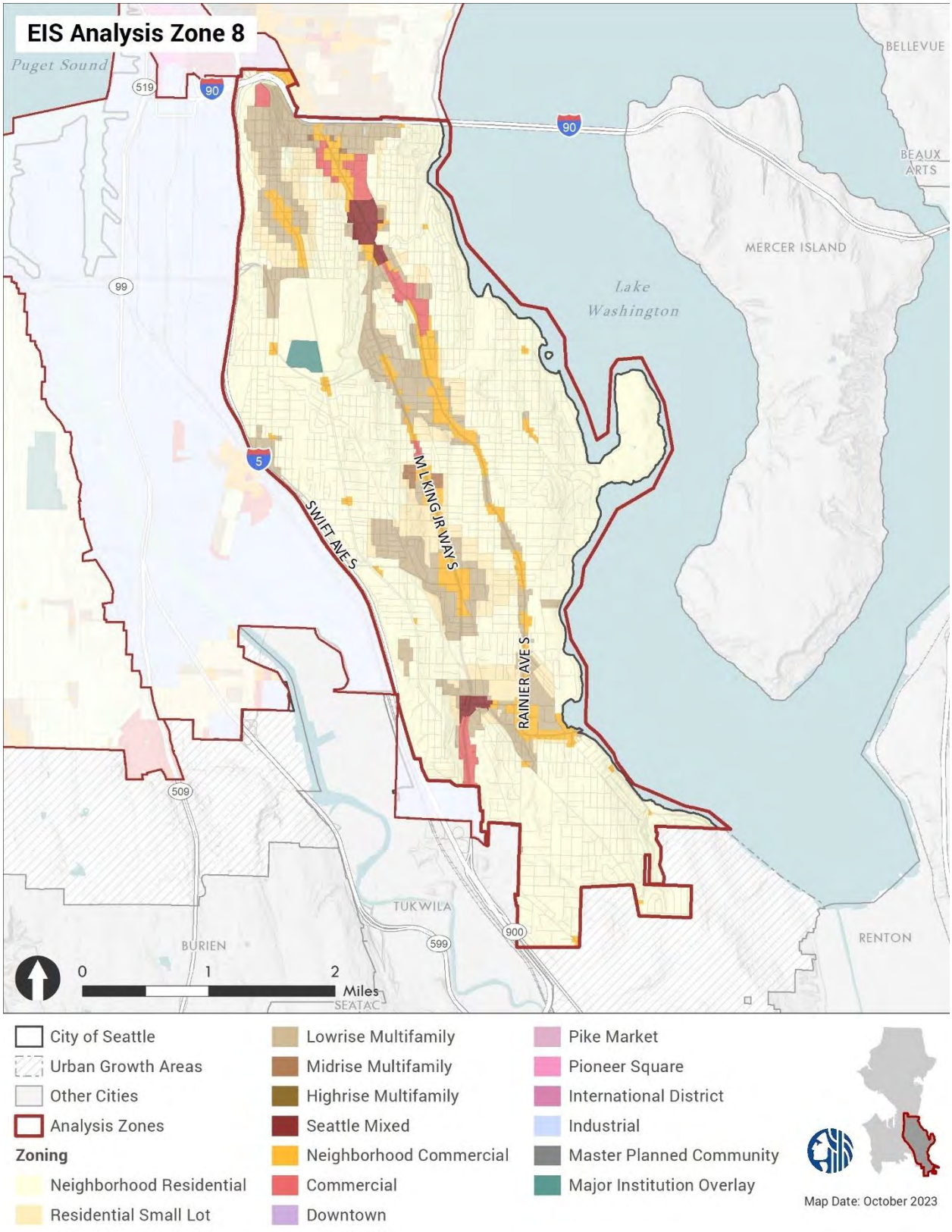
Area 8 includes about 9% of the city's designated shoreline district (678 acres). Nearly 85% of this area is within a conservancy shoreline environment including Conservancy Management (8%) around the Stan Sayres Boat Launch, Lakewood Marina, and Parkshore Arena, Conservancy Preservation (17%) surrounding Seward Park, and Conservancy Recreation (59%) spanning the remainder of the shoreline. Another 14% is designated as Urban Residential covering the lakefront properties south of I-90 and north of Coleman Beach, and lakefront properties between Seward Park and the southern extent of the City of Seattle. Designated shoreline acreage within the analysis area is detailed in **Exhibit 3.6-18** and mapped in **Exhibit 3.6-65**.

Exhibit 3.6-63. Area 8: SE Seattle—Future Land Use Designations



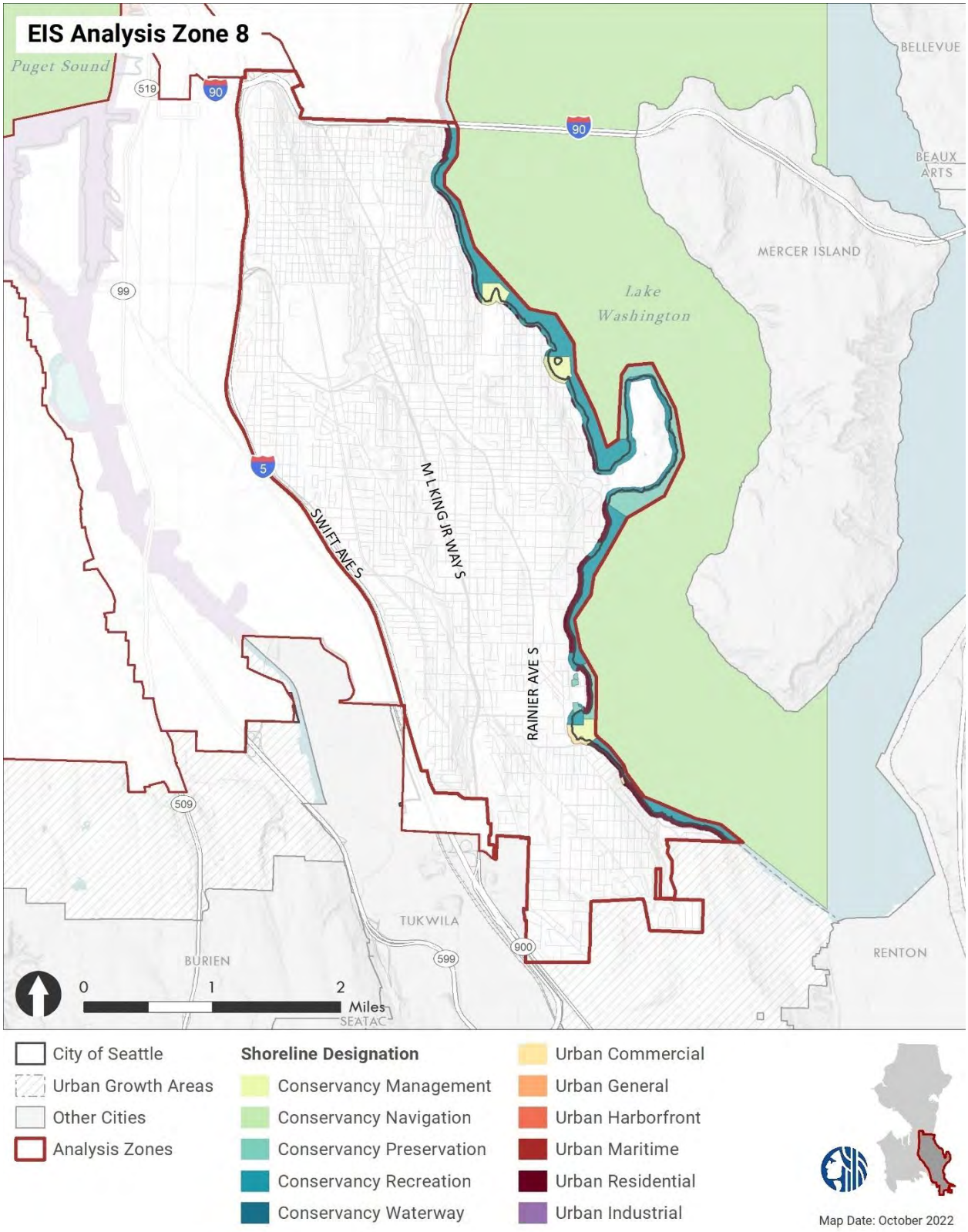
Source: City of Seattle, 2022; BERK, 2023.

Exhibit 3.6-64. Area 8: SE Seattle—Zoning



Source: City of Seattle, 2022; BERK, 2023.

Exhibit 3.6-65. Area 8: SE Seattle—Shoreline Designations



Source: City of Seattle, 2022; BERK, 2022.

Existing Land Use & Urban Form

Existing Uses

The largest existing land use category is single family residential, which accounts for 57% of the land (versus 48% citywide). Existing commercial/mixed-use and multi-family uses, as well as a majority of the community assets, are located within the existing urban village boundaries.

Major institutions and public facilities account for 6% of the existing land uses consisting primarily of the Veterans Administration Campus and Hospital, the high voltage power easement running NW to SE diagonally through the analysis area, and public schools including Emerson Elementary, Kimball Elementary, Mercer Middle School, Rainier Beach Highschool, Cleveland Highschool, and Franklin Highschool. Parks, open space, and cemeteries account for an additional 17% of current land uses and consist of mostly large urban parks including Seward Park, Jefferson Park and the Jefferson Park Golf Course, the Cheasty Natural Area, and Kubota Garden.

Vacant land accounts for a higher share of current use in the analysis area versus vacant use citywide (7% versus 5%). This is largely because of the high voltage power easement running through the analysis area as well as unused lands adjacent to the Sound Transit Light Rail line.

Current land use acreage is detailed in **Exhibit 3.6-19** and mapped **Exhibit 3.6-66**.

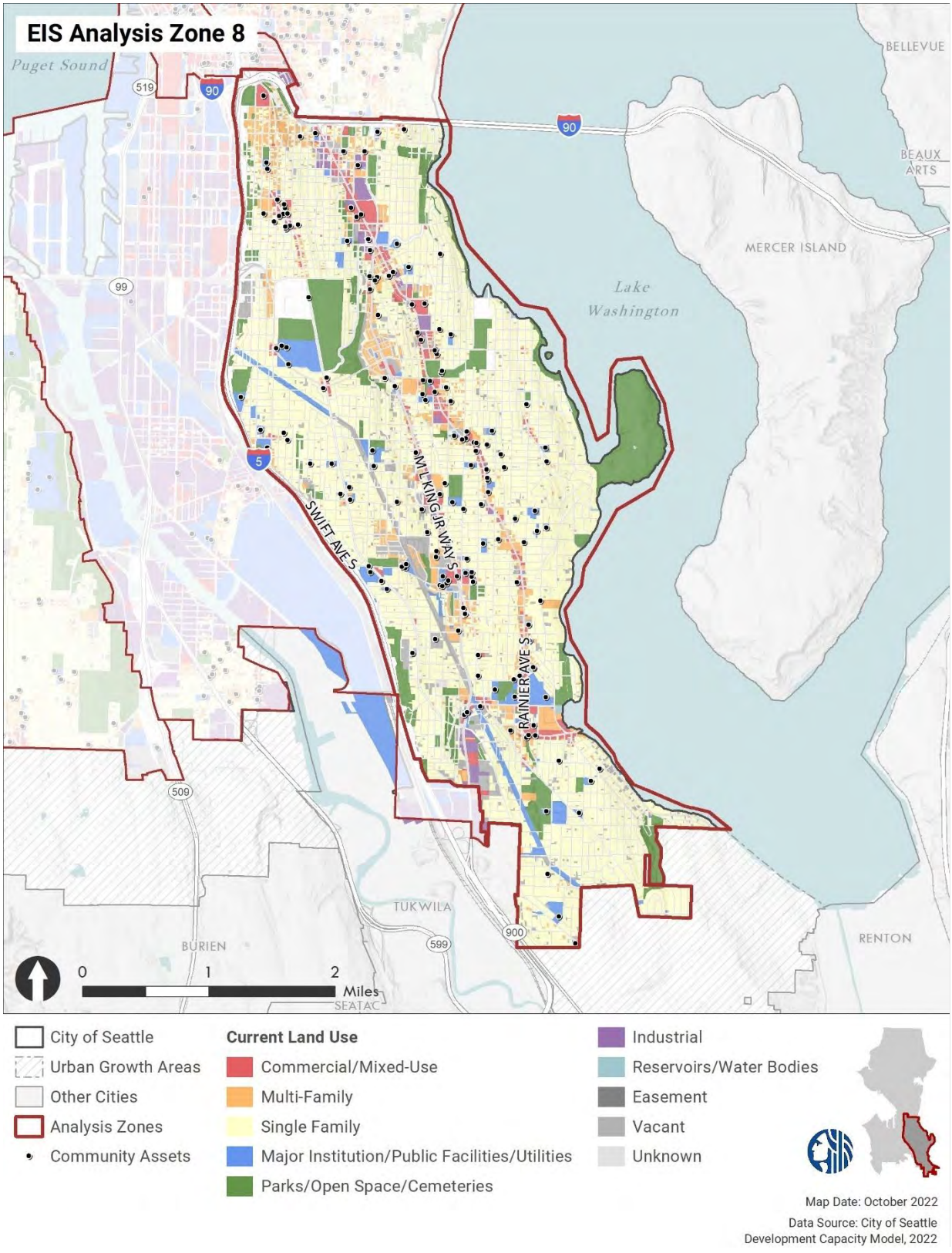
General Urban Form

Urban form in the Rainier Valley is relatively disjointed and more auto-oriented compared to most areas of the city. This is likely a result of multiple factors including:

- Topography that cuts against the standard north–south street grid in most places.
- Historic disinvestment.
- The legacy of redlining and racist real estate practices.
- Construction of I-90 through the Atlantic neighborhood in the late 20th century.

Redevelopment of the light rail station areas over the last decade has and continues to dramatically change urban form. Notably, five large sites in the immediate Othello station area redeveloped with 6- to 7-story mixed-use buildings. Rainier Beach is also seeing multiple 4- to 6-story apartment/condo buildings and 3-story townhouses constructed and/or in the development process. See **Exhibit 3.6-67**.

Exhibit 3.6-66. Area 8: SE Seattle—Current Land Use



Source: City of Seattle, 2022; BERK, 2022.

Exhibit 3.6-67. Five Major Redevelopments at Othello, 2009-2022

Source: Google Earth, Image US Geological Survey, Imagery Date 4/30/2009 and 8/21/2022.

Heights

The tallest buildings in Area 8 are found along the light rail alignment near stations and in the North Rainier, North Beacon Hill, and Columbia City urban villages. Building heights in these areas are generally 5- to 7-stories right off of Rainer Avenue, Martin Luther King Jr Way, and next to light rail stations. Heights drop to 3- and 4-story buildings 1 to 2 blocks from the major arterials. However, most of the rest of the analysis area is zoned Neighborhood Residential and has building heights of 1 to 2 floors.

Shadows

The location of Mt Baker, Columbia City, Othello (east side), and Rainier Beach (north side) urban villages in a valley with slopes to the south and west creates a relatively shady environment in winter months.

3.6.2 Impacts

Local land development patterns and zoning policies fundamentally affect many of the critical factors that shape the form and character of Seattle and the neighborhoods within, directly affecting people's access to housing, jobs, schools, open space, public services, and transportation. Restrictions on density or large-lot requirements, for example, affect housing supply and price, while limiting where families with low incomes can afford to live and attend school. Overly restrictive land use regulations can also narrow economic opportunities for workers or encourage expansion outward, increasing travel by car and greenhouse gas emissions (GHSs). This section focuses on the potential impacts—including equity and climate vulnerability considerations—of changes in land use patterns, permitted uses, or development intensities. Impacts are discussed based on the following categories:

- **Land use patterns** consider the distribution of growth and intensity of planned uses as well as resulting activity levels.
- **Land use compatibility** considers changes in use type between adjacent areas and any likely incompatibilities. Land use incompatibilities could be related to health and safety (such as noise levels or odors), activity levels at various times of day/night, or conflicting movement patterns.
- **Height, bulk, and scale** considers the physical form, aesthetic, and character of development (such as massing, setbacks, height, and FAR).
- **Transitions** consider visual changes in physical form between adjacent areas.
- **Tree canopy** considers how urban form affects tree canopy.
- **Shadows** consider shading of public open space or rights-of-way as a result of allowed development and the possible implications related to health, urban heat, and the human experience.
- **Views** consider the protection of public views of important landmarks and natural features, as well as views from specific designated viewpoints within the city and scenic qualities along mapped scenic routes.

Impacts Common to All Alternatives

Land Use Patterns

Seattle will likely continue to experience housing and employment growth under all alternatives consistent with the planning estimates described in **Chapter 2**. Activity levels would increase across the city with new residents, businesses, and employees. The alternatives differ primarily in the distribution and intensity of growth across the city and the projected land use patterns. The actual pace and distribution of future growth would be influenced in part by the implementation of comprehensive plan policies, related regulations and actions, and decisions made by individual property owners and developers.

In general, all alternatives would focus most future growth into centers currently characterized by higher densities, more compact building forms, and a more diverse mix of uses than other areas of the city. Under all alternatives, 80,000 new housing units would be distributed based on past growth and Comprehensive Plan targets, resulting in growth primarily in existing centers and villages. In the action alternatives, 20,000 or 40,000 additional housing units would be accommodated in new place types or expanded center boundaries located throughout the city depending on the alternative. All alternatives assume the same overall growth in jobs with a little over half of job growth in Downtown/South Lake Union (Area 4) and about 9% in the Duwamish Manufacturing Industrial Center (Area 7). Alternatives 2, 3, and 4 assume a small job shift from the larger centers towards other place types to reflect local demand with the distribution of new housing. The distribution of jobs and housing under Alternative 5 would be a combination of the other alternatives after accounting for expanded urban village boundaries and potential changes to place type designations.

The six urban centers and two MICs are currently designated PSRC ~~Metro~~ Regional Growth Centers (RGCs) and Employment MICs, respectively, and would retain these designations under all alternatives. Downtown, First Hill/Capitol Hill, South Lake Union, and Uptown would meet PSRC's future activity unit threshold for Metro RGCs under all alternatives. University District and Northgate would meet PSRC's future activity unit threshold for Urban RGCs under all alternatives which could result in redesignation from Metro to Urban RGC in the future. The City could also seek to designate the other urban villages as countywide growth centers under King County CPP framework. Activity units per acre would increase in all of the centers under Alternatives 1-4 and in most centers under Alternative 5. The boundary of some regional and urban centers (currently called urban centers and urban villages) would be expanded under Alternative 5 and the Preferred Alternative to meet the minimum size threshold resulting in a decrease in activity units per acre within the boundaries of West Seattle Junction, Admiral, Greenwood–Phinney Ridge, Morgan Junction, and Upper Queen Anne. Future activity units per acre are discussed in more detail under each alternative.

See also **Section 3.7 Relationship to Plans, Policies, & Regulations** for more discussion of PSRC ~~Metro~~ Regional Growth Centers and King County Countywide Centers.

As a result of these growth distributions, Seattle's land use pattern—broadly defined—would continue to emphasize:

- Growth leading to a denser and more continuous pattern of intensive land uses in the city's geographic center (Downtown plus the surrounding neighborhood districts including Uptown, South Lake Union, Capitol Hill, and First Hill).
- Business and port-related activity and employment growth within two central Port and industrial-use centers (Greater Duwamish MIC and BINMIC). All alternatives studied in this EIS include changes implemented as part of the Industrial and Maritime Strategy.
- Growth in a wide range of other mixed-use centers such as Fremont, Columbia City and West Seattle Junction distributed through the various sectors of the city, including centers located along major transportation corridors (such as Aurora Avenue, Lake City Way, MLK

Jr Way, Rainier Avenue, and California Avenue) that radiate through the various geographic sectors and industrial-use centers.

- More residents, employees, and buildings would be exposed to increased climate risks in many of the centers without additional mitigation. For example, the Downtown/South Lake Union (Area 4) and Duwamish Manufacturing Industrial Center (Area 7) are generally "heat islands" with more pavement and almost no areas with more than 10% tree canopy cover (see **Section 3.3 Plants & Animals** and **Section 3.11 Public Services**).

Land use patterns in areas outside of the centers would vary depending on the alternative as discussed below.

Land Use Compatibility

Housing and employment growth under all alternatives will result in additional development and redevelopment activity citywide. Future growth under all alternatives is likely to increase the frequency of different land use types locating close to one another, and similarly likely to increase the frequency of land use patterns that contain mixes of land uses with differing levels of intensity, both within the centers and, to a varying extent, in other areas of the city. Mixing uses in centers is a goal of the current Comprehensive Plan because having a variety of uses near one another allows people to conduct more of their daily business without driving and reduce GHG emissions; however, some adjacencies could potentially cause adverse compatibility impacts on less intense uses. Over time, infill development and redevelopment would occur throughout the city to accommodate increased growth under all alternatives, gradually increasing the intensity of development in areas not currently developed to their full zoning capacity. The extent of these conflicts varies by alternative and would continue to be mitigated through the application of existing development regulations.

New mixed-use development may also be introduced under any of the alternatives to areas originally developed under zones which previously allowed only one type of use. This could occur in centers where zoning has already changed since original construction, or where zoning could potentially change under an alternative if rezones to mixed use zones occur in the future. More mixing of uses increases the likelihood of localized adverse spillover effects (such as residential or commercial activities that might lead to increased noise). These compatibility challenges would not be an uncommon or new phenomenon within Seattle's more urbanized centers, but they would represent a potential adverse land use impact of future growth under any alternative. Such impacts can be avoided or mitigated by continuing to implement land use policies and zoning patterns that consider the potential for land use incompatibilities and avoid them through use of transitions in intensity, use restrictions, and/or avoiding proximity of certain kinds of zones. Noise, nuisance, and public safety codes would also continue to provide protection against some of the potential impacts.

Ballard Urban Village & Ballard-Interbay MIC: Land Use Compatibility Conflicts

Most of the southern boundary of the Ballard Urban Village is adjacent to the Ballard-Interbay MIC. Land use compatibility conflicts near this boundary are anticipated under all alternatives and would be similar to those already occurring. Existing land uses in the Ballard MIC north of Leary Way, for example, include a diverse array of industrial, commercial/retail (including a high concentration of breweries and tap rooms), office storage, and some residential uses in blocks flanking 14th Ave NW. These currently abut larger multifamily development on the south side of NW Market St, commercial development on 15th Ave NW, and 1- to 3-story residential east of 11th Ave NW outside the MIC (in the Ballard Urban Village and in multi-family residential areas).

Redevelopment under all alternatives in the urban village and portions of the MIC are expected to be fueled by proximity to light rail. Within the MIC, blocks recently rezoned Industry and Innovation (II) as part of the Industrial and Maritime Strategy legislation (effective on October 23, 2023) would likely be developed with a significant amount of dense employment in multistory structures, including some towers, with dedicated space for ground floor light industry. This generally includes the area between 15th Ave NW and 11th Ave NW north of Leary Way adjacent to the Ballard Urban Village (the 14th Ave corridor). Per the Industrial and Maritime Strategy Final EIS, redevelopment in the 14th Ave corridor would contribute to an agglomeration of daytime employment uses in conjunction with nearby activity in the Ballard Urban Village that would generate higher volumes of daytime workers unrelated to industrial operations.

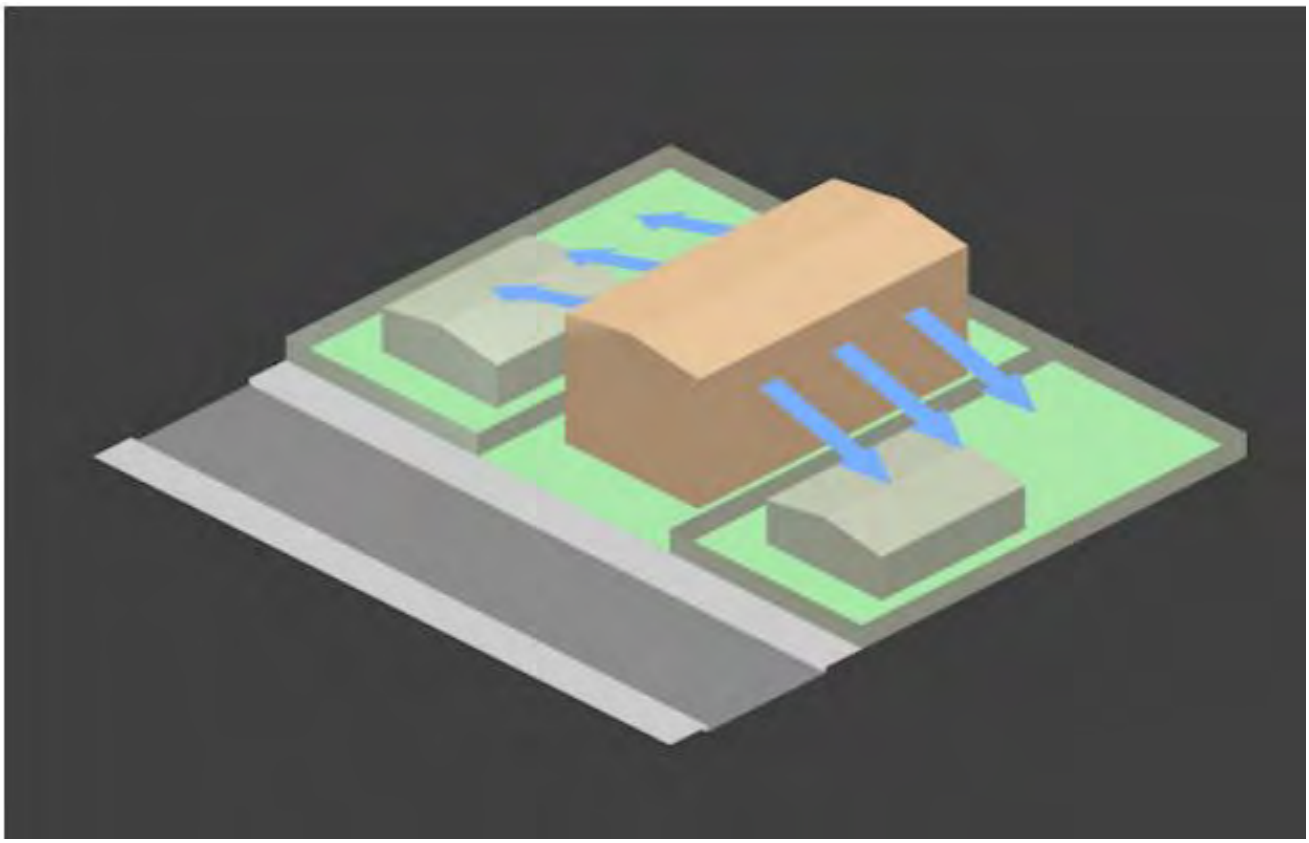
Urban Form

Height, Bulk, & Scale

Future growth and development directed into existing centers under all alternatives would result in a moderate amount of additional height and bulk in these commercial and mixed-use nodes. The overall height, bulk, and scale implications from such development would likely be consistent with that experienced during growth over the last 20 years (e.g., mid- and high-rise buildings for both housing and employment uses in urban centers and low- and mid-rise buildings in urban villages). Residential areas will see limited changes to height, but more development of ADUs will add more buildings to these areas.

The present combination of height, FAR, and setback regulations with small to regular sized lots generally leads to bulky buildings that take up most of the lot (see **Exhibit 3.6-68**). Some characteristics that can be found in bulkier buildings include windows that primarily face neighboring properties, thin strips of outdoor space that struggle to be functional, and spots of semi-permanent shade (The Coalition for More Homes, 2021).

Exhibit 3.6-68. Bulky Buildings



Note: Bulkier buildings are sometimes referred to as sausage flats. Image is an illustration of some of the characteristics found with bulky buildings.
Source: The Coalition for More Homes—New Zealand, 2021

Transitions

Gradual redevelopment of new buildings that are larger than those they replace is likely to occur under all alternatives, especially in urban centers and villages. This redevelopment could lead to starker transitions between individual properties and between different zones and place types.

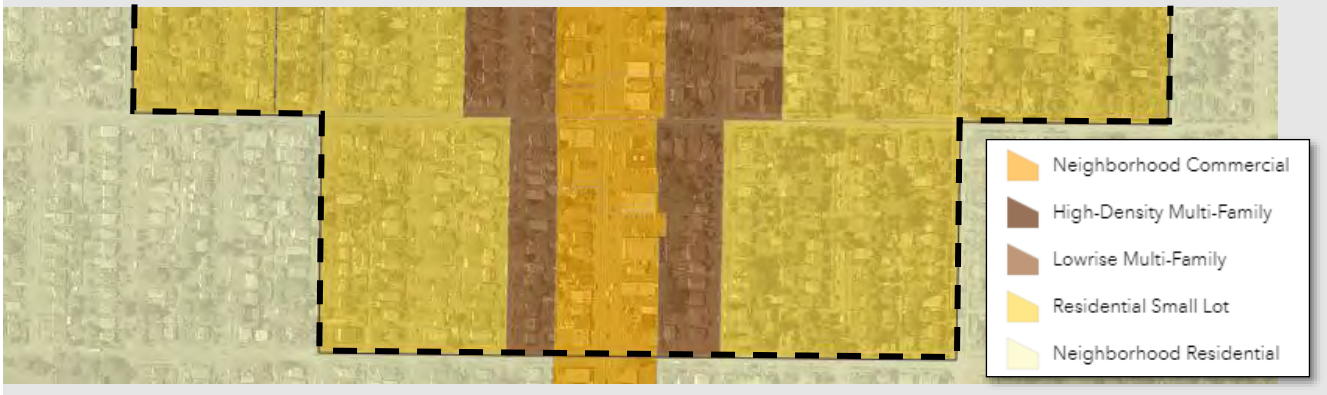
Redevelopment would create a potential for localized adverse compatibility issues as existing, lower-intensity uses transition to higher-intensity development forms. For example, areas predominately composed of detached homes may experience more occurrences of sharper transitions in urban form as new, more intensive forms—such as townhomes and apartments—could be built alongside existing structures.

Redevelopment could also result in sharper transitions between zones and place types. The urban centers and villages typically include a range of zones with mixed-use zones (usually Neighborhood Commercial (NC)) at the core, surrounded by residential zones at progressively lower densities (Midrise (MR), Lowrise (LR), and Residential Small Lot (RSL)). **Exhibit 3.6-69** shows a typical zoning pattern. This arrangement of zones moderates transitions in height and

bulk from the core to the rest of the infill area, and from the infill area boundary to surrounding low-density areas.

Over time, edges between low-density areas and centers may become increasingly stark depending on the alternative. Alternatives with little or no expansion of infill areas may see more concentrated infill and starker contrasts in transitional areas between growth and surrounding areas. Alternatives that expand urban centers or villages may see more gradual transitions. The border between the Downtown and First Hill/Capitol Hill urban centers and less intense neighborhoods to the east and northeast will continue to be a major transition from greater to lesser intensity under all alternatives.

Exhibit 3.6-69. Typical Urban Village Zones



Notes: The map shows a typical progression of zones from the edge (dashed line), with lower height and intensity zones, to the core of the village, with the greater intensity zones. See **Exhibit 2.1-1** in **Chapter 2** for a cross-walk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~A~~lternatives ~~2–5~~.
Source: City of Seattle, 2023.

Tree Canopy

Bulkier development under all alternatives would likely displace some trees on private property, especially in residential zones. At the same time, the number of street trees may increase where they are required with redevelopment. See **Exhibit 3.6-70** and **Exhibit 3.6-71**. The City's ownership of rights of way, community facilities, and parks also offer great opportunity to add trees to meet the City's 30% tree canopy goal and reduce heat islands.[27]

[27] Tress in public rights-of-way play an important role in contributing to canopy cover citywide—rights-of-way currently make up 27% of the city's land area and trees in the rights-of-way contribute 23% toward the city's canopy cover. See **Section 3.3 Plants & Animals**.

Exhibit 3.6-70. Street Trees with Redevelopment

Note: Recent townhouse developments in Seattle with street trees provided, even when it means shifting the sidewalk onto private property. Two photos on left have alley access, while the photo on the right has driveways.
Sources: MAKERS, 2023.

Exhibit 3.6-71. Townhouses with Retained Tree

Sources: MAKERS, 2023.

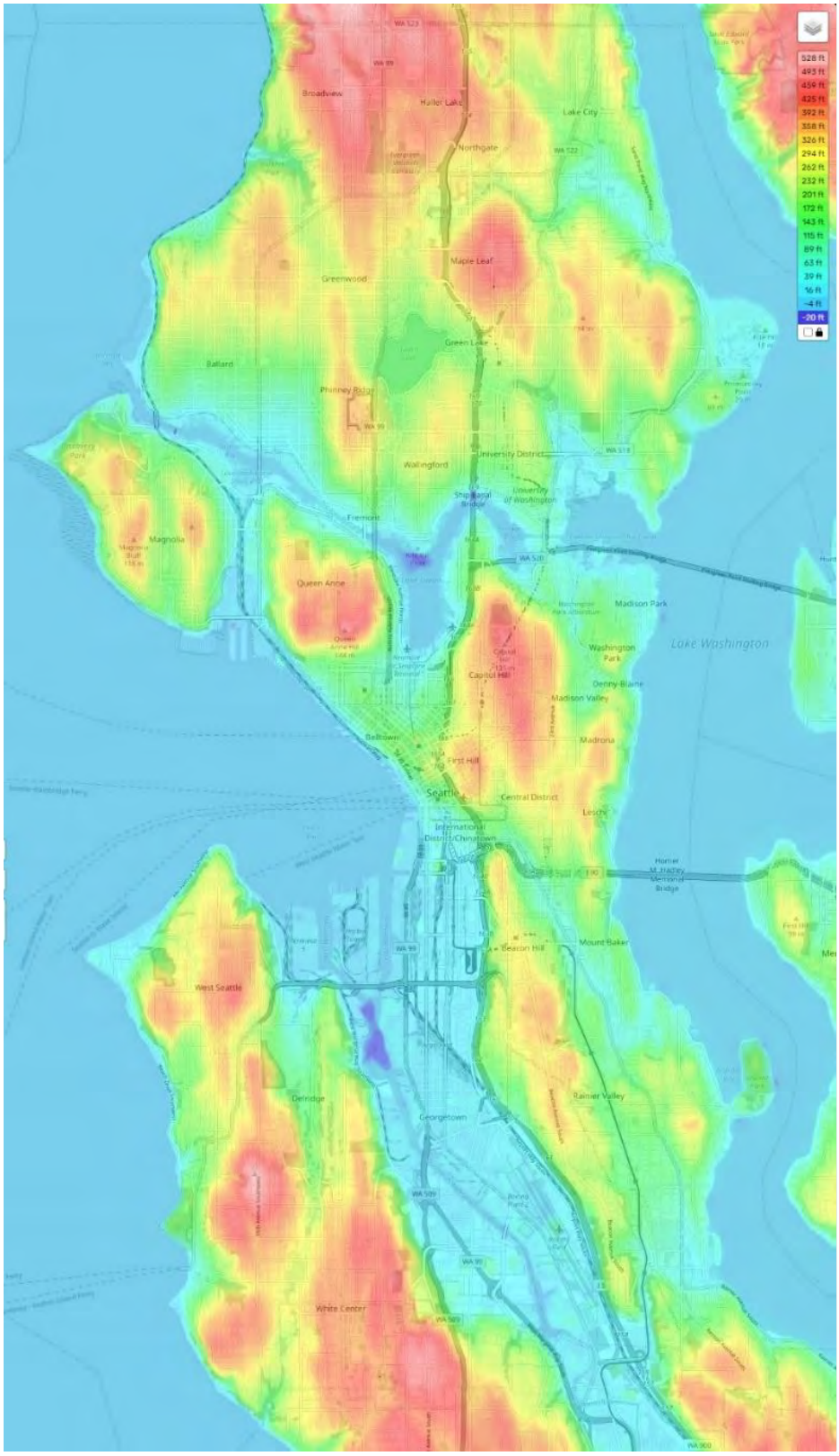
Shadows

Under any alternative, redevelopment will generally be taller and often bulkier than the existing building. Taller buildings cast longer shadows, and bulkier buildings cast wider shadows. A combination of tall and wide can mean large areas become shaded during much or all of the day, especially during winter.

In addition, shadows falling downhill cover greater distances, meaning that buildings toward the top of a north-facing hill can be especially impactful in casting shadows downhill. Likewise, buildings on east-facing hills have strong impacts on afternoon solar access downhill, and buildings on west-facing hills have strong impacts on morning sunlight downhill. **Exhibit 3.6-72** show the topography of Seattle with warmer colors representing higher elevations and cooler colors representing lower elevations. Several hills, combined with taller buildings, would have greater shadow impacts on their generally north sides, such as Crown Hill, Maple Leaf, View Ridge, Wallingford/Tangletown, Magnolia, Queen Anne, Capitol Hill, Washington Park, First Hill, Madrona, West Seattle, High Point, Highland Park, Beacon Hill, Graham Hill, and Rainier View.

Existing trees accustomed to full sun, whether in public right-of-way or on private property, may be harmed if their solar access is reduced which could limit growth or reduce the health of the tree. For streets already shaded, new street trees are selected for their tolerance to lower direct sunlight levels (Seattle Right-of-Way Improvements Manual 3.7 Street Trees). Building shadows may fall on existing solar panels or sites of future panels, but the buildings themselves may provide new opportunities for solar. Given the citywide scale, this analysis does not address this potential impact.

Exhibit 3.6-72. Seattle Topographic Map

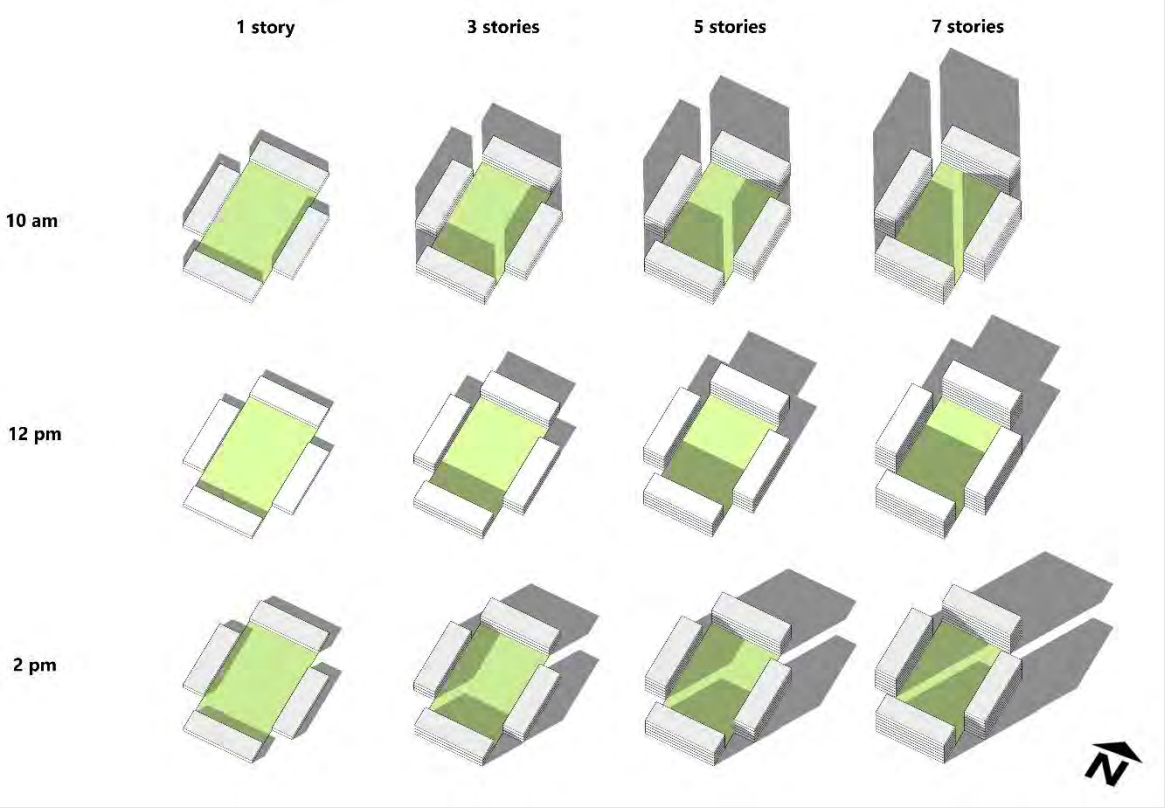


Source: World Topographic Map, TessaDEM, and Open Street Map, 2023 (CC-BY-SA 3.0).

Shadows on Public Parks

Some development would likely occur adjacent to parks under all alternatives. As **Exhibit 3.6-73** illustrates, an adjacent southern building is most impactful throughout the day. For afternoon sunlight (which is often a desired time to visit plazas and parks), adjacent southern and western buildings cast long shadows into a park. Winter solar access can be limited when buildings are 5 or more stories. Summertime shadow impacts may help mitigate urban heat.

Exhibit 3.6-73 Building Height Impact on Shadows over Example Park on Winter Solstice

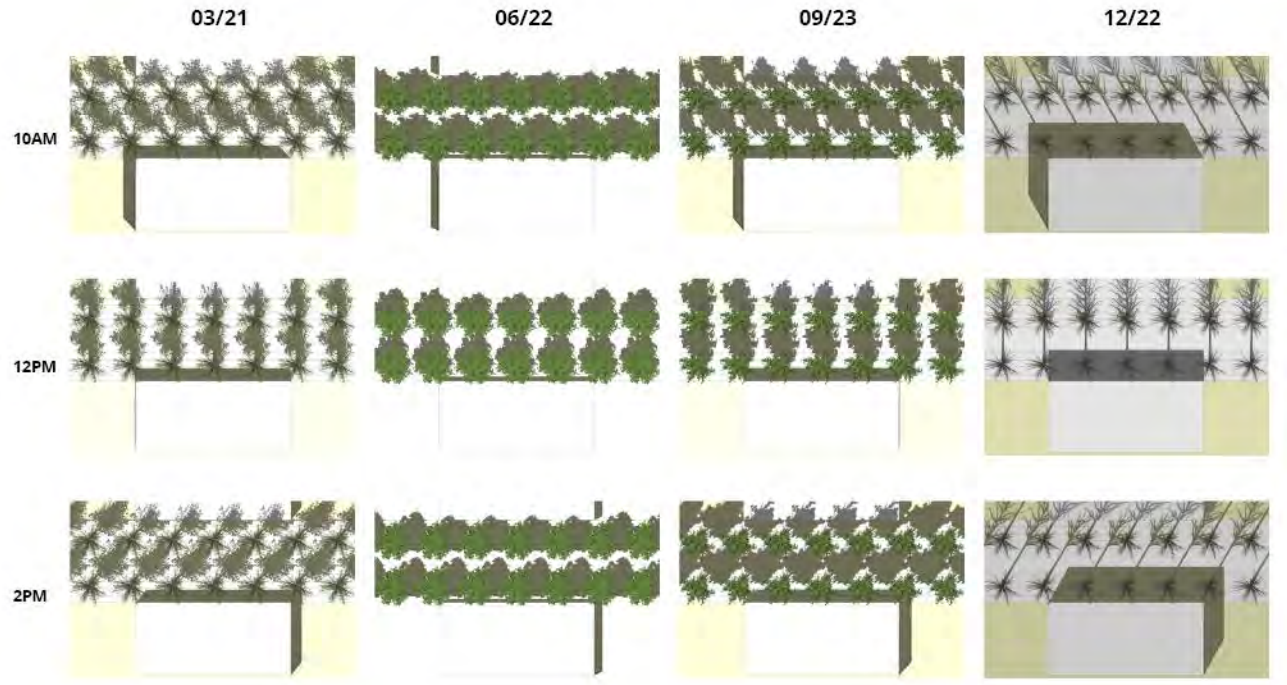


Note: The diagram shows "worst-case" shadows taking place on winter solstice. The illustration shows an example park approximately 200 feet by 300 feet, buildings with a 15-foot ground floor and 10-foot upper stories, and buildings approximately 60 feet wide.
Source: MAKERS, 2022

Shadows on Rights-of-Way

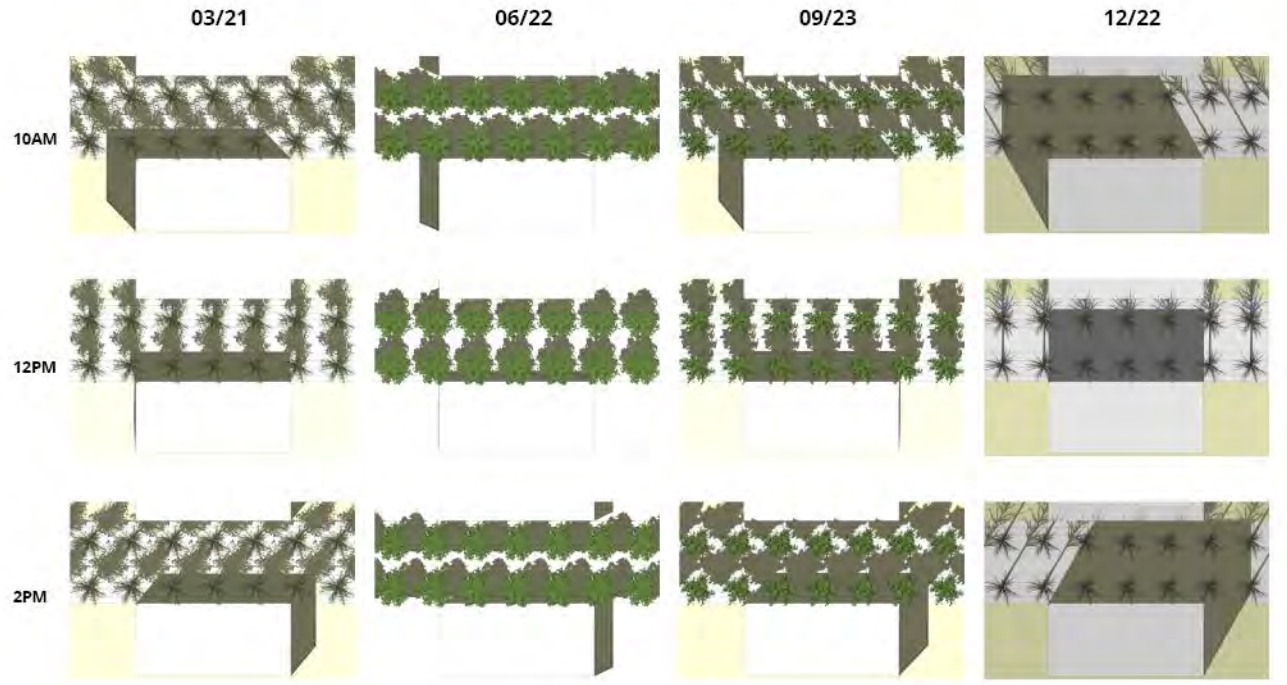
Height limits and street widths vary throughout Seattle, but in all cases, east-west-oriented streets are challenging for solar access, especially during wintertime. In most cases, the 3-story and taller buildings on the south side would shade the southern side of the street throughout the year except summertime and may shade both sides of the street throughout a winter day. Other street orientations would also experience increased shadows with taller redevelopment, but to a lesser degree. See **Exhibit 3.6-74**, **Exhibit 3.6-75**, and **Exhibit 3.6-76**.

Exhibit 3.6-74. 1-Story Building's Shadows on Street



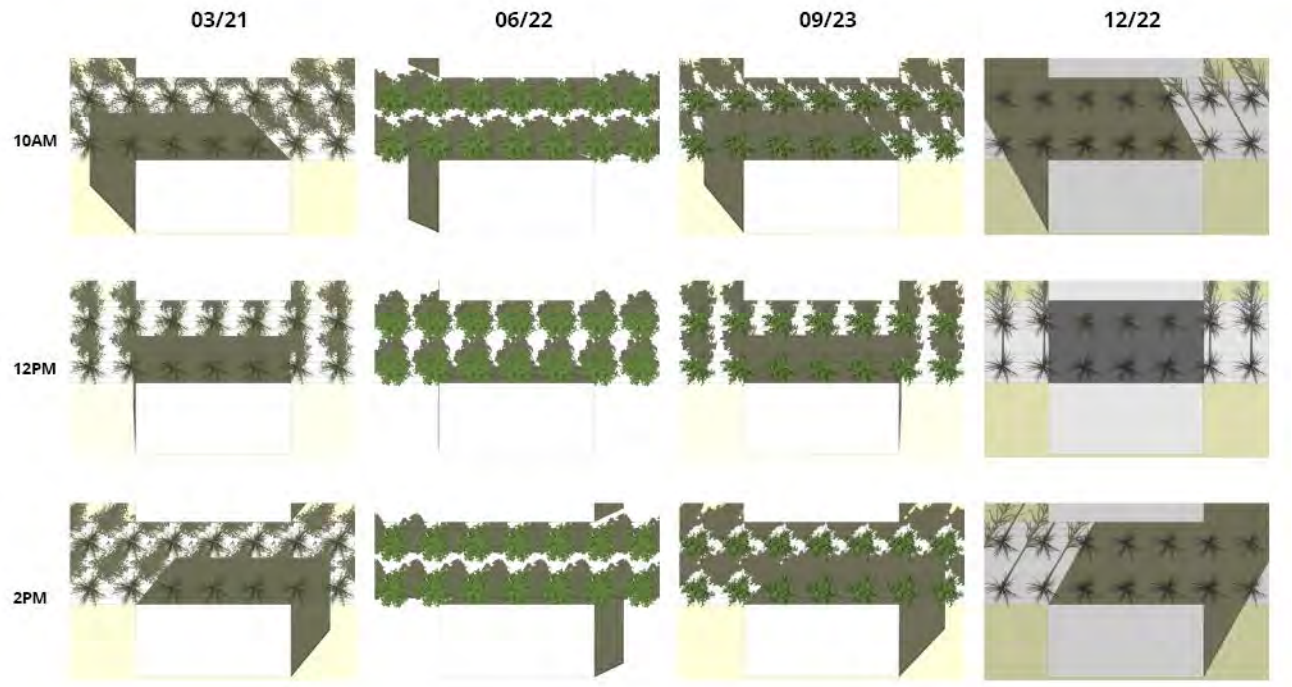
Sources: MAKERS, 2023.

Exhibit 3.6-75. 3-Story Building's Shadows on Street



Sources: MAKERS, 2023.

Exhibit 3.6-76. 5-Story Building's Shadows on Street



Sources: MAKERS, 2023.

Summertime solar access is included in the shadows analysis depictions. However, it is important to note that, during summertime, shadows may be a positive impact. Deciduous trees typically intentionally shade many public spaces to cool the area. With the urban heat island effect and increasingly common instances of extreme heat, building shadows may similarly be considered a positive impact in summertime.

Views

Under all alternatives, new buildings would develop with greater height and bulk, and, with these increases, development may interfere with publicly protected views. Because these views are protected under current regulations, views would remain unobstructed as long as potential impacts are identified during permit review. Of note, the number of SEPA-protected viewpoints, scenic routes, and Seattle-designated historic landmarks means that view corridors impact development capacity on many sites.

Impacts to protected views in many places would likely be fairly minor because most, although not all, SEPA-protected public viewpoints are located away from centers and villages instead capturing scenic views at edges of hillsides, parks, beaches, and schools. Likewise, many shoreline viewpoints are nestled on the coastlines within semi-secluded sites, providing uninterrupted view of the Puget Sound, Lake Washington, and Lake Union.

Views from defined scenic routes are more difficult to generalize but are often views down corridors to distant features (such as Mount Rainier or the Seattle skyline) and/or are episodic in nature, meaning only certain places along the routes have the best scenic qualities that might be adversely affected by future development. The precise nature and degree of potential future view disruptions along scenic routes would depend upon specific locational view qualities and individual project designs.

Landmarks are generally clustered in urban centers with some in urban villages and some dispersed elsewhere. There is no meaningful relationship between the protected viewpoints/scenic routes and the landmarks. Each historic landmark and site has unique conditions and would need to be evaluated at the project, not programmatic, scale.

130th/145th Station Area

The 130th/145th Station Areas will likely redevelop under all alternatives, although the scale, location, and intensity of that development would vary by alternative. Some commonalities include:

- **Height/bulk/scale.** Large superblocks (longer than 600 feet) lacking a connected internal path or street network mean that direct routes to access the station will be challenging without regulations to encourage or require through-connections with redevelopment. Redevelopment at the light rail station would occur in a physically bifurcated, uncomfortable human environment (at 5th Ave NE, Roosevelt Way, and I-5) and could miss an opportunity to celebrate and activate the station entry.
- **Tree canopy.** Plentiful evergreens, steep slopes, Thornton Creek, and environmentally critical areas near the 130th Station Area make development here unique, and perhaps more constrained, than many other Seattle areas. Existing large evergreen trees make residential areas feel set in hillside woods. Tree preservation could impact development capacity, and redevelopment with a loss of existing trees would have a noticeable effect on the human experience and sense of being set in nature.
- **Shadows.** In general, the existing tall evergreens, combined with steep slopes, significantly shade many residential areas. Shadow impacts from increases in building heights would be less noticeable in these residential areas because of those existing shadows. The north-south orientation of 15th Ave NE, as well as to a lesser extent the diagonal orientation of Roosevelt Way NE, allows for greater solar access for longer hours throughout the year, even with increases in building heights.

Specific land use and urban form impacts in the station areas are described under each alternative below.

Equity & Climate Vulnerability Considerations

Housing policy and zoning laws have a history of causing harm to Black, Indigenous, and People of Color in Seattle (see **Racially Restrictive Covenants & Zoning Laws** above). Additionally,

the high cost of housing makes it very difficult for people to find housing near jobs, schools, friends, and family and perpetuates existing inequalities. The land use patterns proposed under each alternative, as well as potential resulting compatibility conflicts, are evaluated below for their likelihood to intensify or lessen these historical inequities.

Height and Density: Relationship to Housing Supply & Affordability

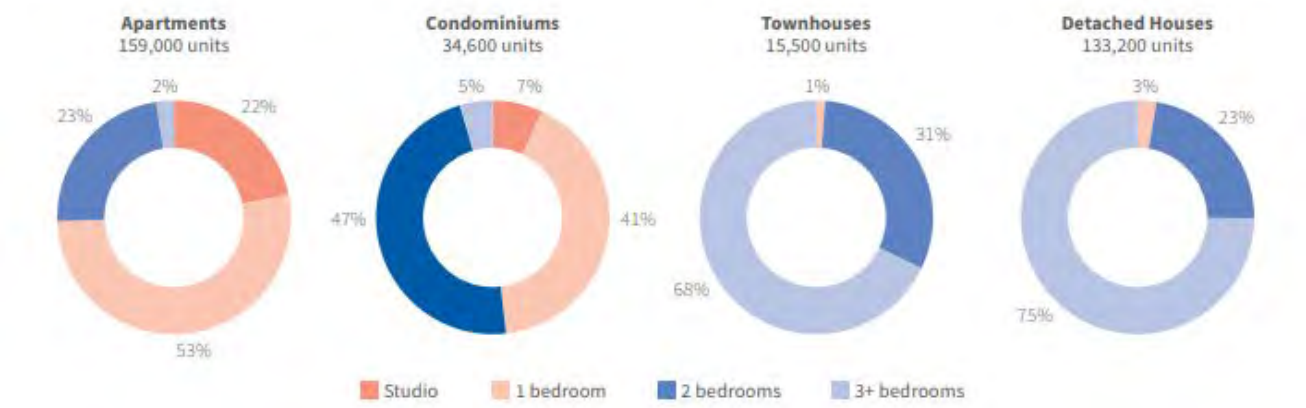
The height of a residential building is an important indicator of how many housing units can fit in one building and is strongly correlated with density. Taller buildings are generally denser and have more units than shorter buildings. Dense housing splits the cost of housing development among more households meaning the cost per household is more economical than low density housing.

The large area (about 80%) of Seattle's residential land being zoned for shorter, low-density housing constricts the choices people have on where they can live in Seattle. A broad, citywide approach to allowing increased density with taller buildings would likely have more equitable impacts to housing choice, a more varied urban form, and more opportunity for vibrant neighborhoods.

See also **Section 3.8 Population, Housing, & Employment** for more discussion of the relationship between housing and equity and climate vulnerability considerations.

The present combinations of allowed height, FAR, and setbacks found in Seattle's zoning regulations generally led to denser housing with many studio and 1-bedroom units over the last 20 years. As **Exhibit 3.6-77** indicates, 2% of apartments and 5% of condominiums in Seattle have 3+ bedrooms (City of Seattle & King County Department of Assessments, 2019). This has meant family size housing or units large enough for households with children is consistently scarce in Seattle and also unaffordable to most households with children or looking to have children. The lack of 3+ bedroom multi-family housing means that children and families are limited in housing choices in the city limits or means that families crowd into smaller units. However, allowing a wide variety of housing types may open up opportunities for more multi-family housing that is child and family friendly.

Exhibit 3.6-77. Bedroom Unit Diversity in Seattle Housing Stock



Source: City of Seattle, Housing Choices Background Report, 2019.

Relationship to Active Transportation

In general, the regional center, urban center, and neighborhood center place types, as well as increased density overall, would allow more people to live in walkable/bikeable/rollable communities with improved access to transit. This would mitigate climate impacts and improve chances at social connectedness:

See also **Section 3.10 Transportation**.

- Density decreases reliance on cars, enables easier mode shift, and lowers vehicle miles traveled (VMT) (IPCC, 2022). A broad, citywide approach to allowing increased density would likely improve Seattle's response to climate change. See **Section 3.2 Air Quality & GHG Emissions**.
- Development that improves conditions for active, human-powered travel and public transportation use decreases social isolation and increases chances for social interaction and wellbeing (Mattison et al., 2015; Holt-Lunstad, 2020; National Academies of Sciences, Engineering, and Medicine, 2020). A broad, citywide approach to allowing increased density would likely have more equitable impacts to human health and wellbeing.

Relationship to Street-level Community-building Spaces

A lively, vibrant neighborhood center is dependent on having a robust residential population nearby. The expected patterns of development, with increased height, bulk, and scale, could improve the ability to gather in public places and cultural anchors (i.e., culturally relevant businesses, services, religious institutions, arts, etc.), as long as commercial space displacement is mitigated and appropriate gathering spaces are provided. Upzones in high displacement risk areas may have a greater immediate impact on the street-level experience with construction impacts and potential displacement of cultural anchors. However, in the long term, with appropriate mitigation, equitable development could improve conditions. The Africatown development at 23rd and Union in the Central District is an example of this, where the Liberty

Bank Building honors Black resilience to redlining, affordable housing is marketed to Black people who had been displaced from the Central District, and affordable commercial space for Black-owned businesses and services and a plaza for community gathering are provided.

Residential Design for Social Wellbeing & Sociability

A lack of social connections increases the risk of many health issues and chronic stress (CDC, 2021). Loneliness is most prevalent in low-density areas where commuting by car reduces opportunities for social interactions and high-rise buildings if residential design does not promote community and relationship building (Mattisson et al., 2015; Kalantari and Shepley, 2021).

To promote social connection, Health Affairs recommends policies such as, "Diversify housing design to incorporate communal and workspaces to encourage social interaction and reduce commute times, urban design that balances public and private space, housing to better serve changing demographics" (Health Affairs, 2020). A broad, citywide approach to allowing increased density would likely support policy recommendations from Health Affairs.

Happy Cities' *Designed to Engage* report and *Happy Homes Interactive Toolkit* offer policy and development standard recommendations for designing multi-family housing to promote sociability, such as missing middle and diverse housing types, social corridors in multi-family buildings, open/amenity space open only to residents, and breaking down the number of households using a shared entrance or corridor (Happy Cities, 2020). Taller, thin, small lot, dense multi-family housing, such as point access block apartments, are building types that align well with residential design for sociability. Seattle's building code allows up to four units off of one stairwell, allowing for opportunities for social interaction with neighbors and the ability to build trust with neighbors. Thinner buildings allow for more open space. A broad, citywide approach to allowing increased density with taller buildings would likely improve residential design for sociability and social wellbeing.

Climate Change

Like the greater Puget Sound region, Seattle is already experiencing extreme climate events consistent with climate change projections. Areas of the city that could pose greater risks to residents and businesses include sea level rise particularly along the Duwamish River as well as along marine waters of Areas 1, 3, 4, and 6. Along the edges of the city and water bodies are geologic hazard areas like landslides or erosion hazard areas where extreme precipitation could increase the land affected (see **Section 3.1 Earth & Water Quality**). Locations where there could be greater exposure to extreme heat include places with more impervious area and less tree canopy. Tree canopy, for example, is largely absent from Downtown and major industrial areas along the Duwamish Waterway and in Interbay (see **Section 3.3 Plants & Animals**). The alternatives vary in their proposed concentration of growth in areas vulnerable to climate risks or in their level of opportunity to incorporate additional climate resilience strategies. Most population will be concentrated in centers or corridors away from most hazards, especially under Alternatives 1, 2, and 4. Distributing more growth in urban

neighborhoods under Alternatives 3 and 5 could increase the potential for populations to be closer to hazards or affected by interruptions in access to their neighborhoods. All action alternatives include a new Environment and Climate Element that incorporate mitigation and adaptation strategies and include policies regarding tree canopy protection or enhancement and critical area regulations. Utility providers are also developing system plans that anticipate climate change effects (e.g., stormwater plans) to help reduce effects.

Impacts of Alternative 1: No Action

Land Use Patterns & Compatibility

Alternative 1, No Action, would maintain the status quo of focusing most housing and jobs within existing centers and villages with limited change to land use patterns outside of those proposed as part of the recent Industrial and Maritime Strategy EIS. See **Exhibit 2.4-4.**

Homes and jobs would be distributed across the city based on observed growth between 2010 and 2020 and the distribution of growth in the Seattle 2035 Comprehensive Plan (current future land use designations are mapped citywide in **Exhibit 3.6-15**). New housing would continue to be primarily rental apartments concentrated in existing mixed-use areas with land outside the centers and villages limited primarily to high-cost detached houses. Most new housing would be in Area 4 encompassing the Downtown and South Lake Union urban centers, followed by Area 1 which contains the Ballard Urban Village and Area 5 which contains the First Hill/Capitol Hill Urban Center. New jobs would continue to be located primarily in existing centers and villages. Over time, infill development and redevelopment would occur throughout the city to accommodate increased growth, gradually increasing the intensity of development in areas not currently developed to their full zoning capacity. Growth would continue to be limited by existing zoned capacity (current generalized zoning is mapped citywide in **Exhibit 3.6-16**).

Future planned activity units per acre in each center and village under the No Action Alternative are listed in **Exhibit 3.6-78**. Like all alternatives, the six urban centers and two MICs would retain their designations as PSRC ~~Metro~~ Regional Growth Centers (RGCs) and Employment MICs, respectively, under the No Action Alternative. Most of the urban villages would meet King County's threshold of 30 future activity units per acre with the exception of Othello and Rainier Beach in Area 8 and South Park in Area 7. No center or village boundary changes are proposed as part of the No Action Alternative—several urban villages would continue to be outside the 160–500 acre size thresholds as described under **Impacts Common to All Alternatives**.

Land use incompatibilities would be similar to those observed today and described under **Impacts Common to All Alternatives** but could become more severe over time with continuing trends. Mixing of new and existing uses could generate adverse localized incompatibilities, either within centers and villages or at their periphery where more intense development could occur adjacent to low-intensity uses outside the center or village (see also the **Transitions** section below). Increased development intensity and the pace of change may

result in localized compatibility conflicts. These conflicts would continue to be managed by the application of existing development regulations and design standards. No significant adverse impacts are anticipated with respect to land use compatibility under the No Action Alternative.

Exhibit 3.6-78. Future Activity Units (AU)—Alternative 1: No Action

Center/Village	Existing AU/Ac.	Alt 1. Acres	Alt. 1 AU	Alt. 1 AU/Ac.
Urban Centers[1]				
Downtown	377.4	952	450,509	473.2
First Hill/Capitol Hill	139.5	916	149,746	163.4
University Community	54.5	753	52,890	70.2
South Lake Union	236.7	340	116,965	344.1
Uptown	131.3	333	53,775	161.3
Northgate	57.3	412	30,946	75.1
Hub Urban Villages[1]				
Ballard	67.7	495	48,030	96.9
Bitter Lake Village	44.0	364	20,147	55.4
Fremont	71.9	214	18,892	88.1
Lake City	57.6	142	10,719	75.4
Mt Baker	36.0	491	23,288	47.4
West Seattle Junction	70.4	269	26,981	100.2
Residential Urban Villages[1]				
23rd & Union-Jackson	38.9	625	29,080	46.5
Admiral	49.2	98	5,943	60.4
Aurora-Licton Springs	44.1	327	16,796	51.4
Columbia City	33.9	335	15,442	46.1
Crown Hill	25.3	271	8,509	31.4
Eastlake	70.2	199	16,337	82.0
Green Lake	70.6	109	9,500	87.4
Greenwood-Phinney Ridge	84.5	94	9,566	101.6
Madison-Miller	65.3	145	12,368	85.1
Morgan Junction	34.1	113	4,711	41.6
North Beacon Hill	28.1	267	9,196	34.5
Othello	23.7	499	14,480	29.0
Rainier Beach	23.0	346	9,015	26.0
Roosevelt	61.4	170	13,819	81.2
South Park	14.7	263]	4,860	18.5
Upper Queen Anne	89.5	53	5,814	110.5
Wallingford	42.2	258	13,274	51.5
Westwood-Highland Park	27.9	275	8,962	32.6

1 See **Exhibit 2.1-1** in **Chapter 2** for a cross-walk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~A~~lternatives ~~2–5~~.
Note: Activity units (AU) is the sum of residential population and jobs. Assumes an average household size of 2.05 per the King County Growth Management Planning Council. Highlighted densities or size for the hub and residential urban villages fall outside King County's countywide center designation criteria of 160–500 acres or below the minimum 18 existing AU or 30 future AU per acre. MIC designation criteria from PSRC does not include an AU density threshold.
Sources: City of Seattle, 2023; BERK, 2023.

Urban Form

Height, Bulk, & Scale

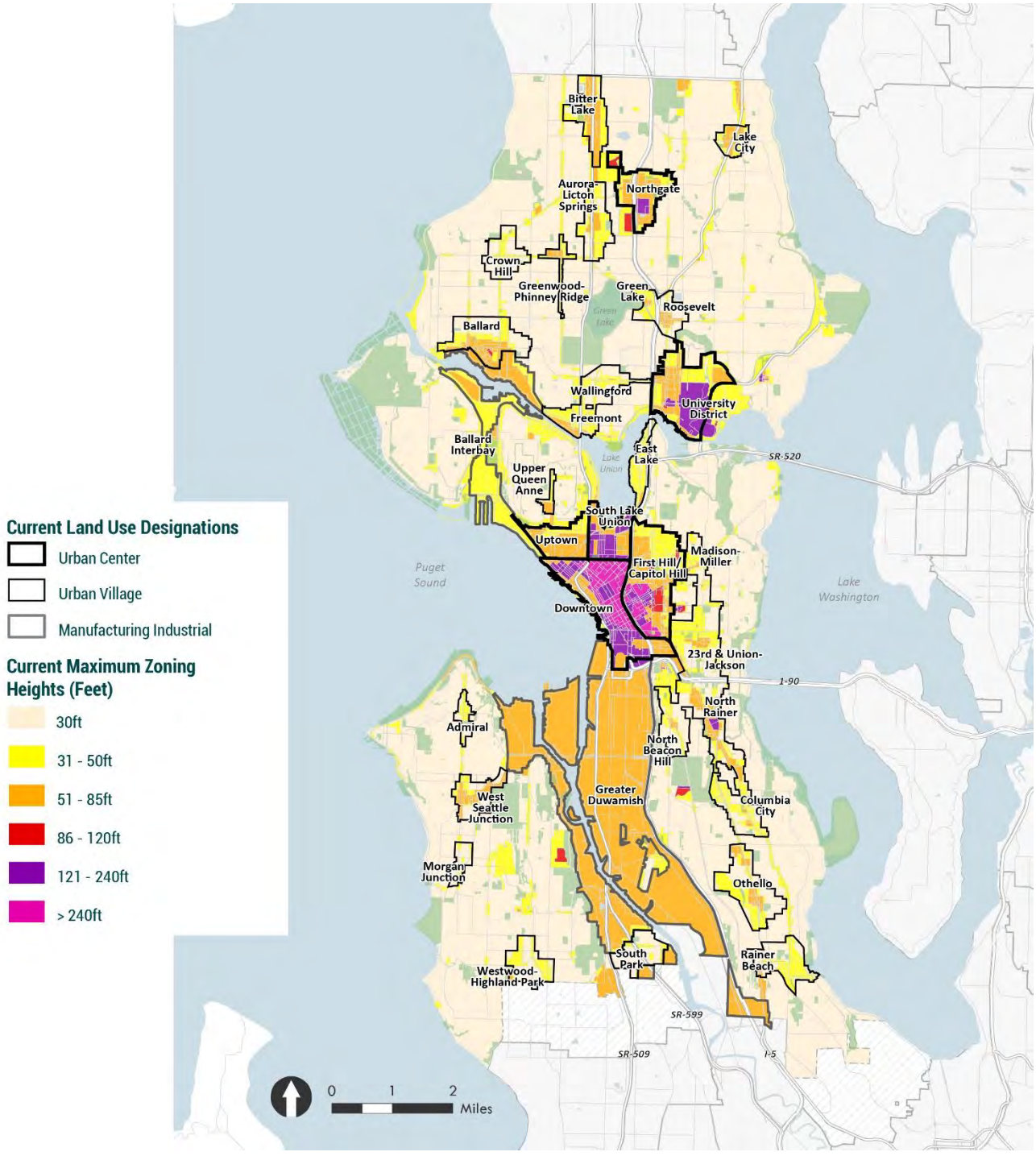
Impacts to height, bulk, and scale under Alternative 1 would be similar to the existing pattern described under Citywide Affected Environment. As growth is directed into existing centers and villages, a moderate amount of additional height and bulk would result from future development in these commercial and mixed-use nodes. The overall height, bulk, and scale implications from such future development would likely be consistent with that experienced during growth over the last twenty years.

As shown on **Exhibit 3.6-79**, urban centers allow the greatest building heights, particularly Downtown and South Lake Union, which results in mid- and high-rise buildings for both housing and employment uses. Urban villages allow a range of moderate and medium scale buildings, with building heights ranging from 30 feet to 85 feet, which results in low- and mid-rise buildings. Areas surrounding centers and villages are primarily zoned neighborhood residential which has a maximum height of 30 feet. Neighborhood residential zones would likely see more development of accessory dwelling units (ADUs) over the next 20 years. **Exhibit 3.6-80** shows 1-4 unit development that could happen in Neighborhood Residential zones under Alternative 1.

Related to the height of buildings, the bulk and size of building are influenced by zoned FAR. Urban centers allow the greatest FARs, followed by urban villages, and neighborhood residential. The relationship between height and FAR in many of Seattle's zones have led to a significant number of buildings developed during the last 20 years to be larger lot developments, which result in bulkier buildings than smaller lot developments. However, the City's existing development regulations and design review process are anticipated to be sufficient to reduce impacts to height, bulk, and scale to less than significant levels.

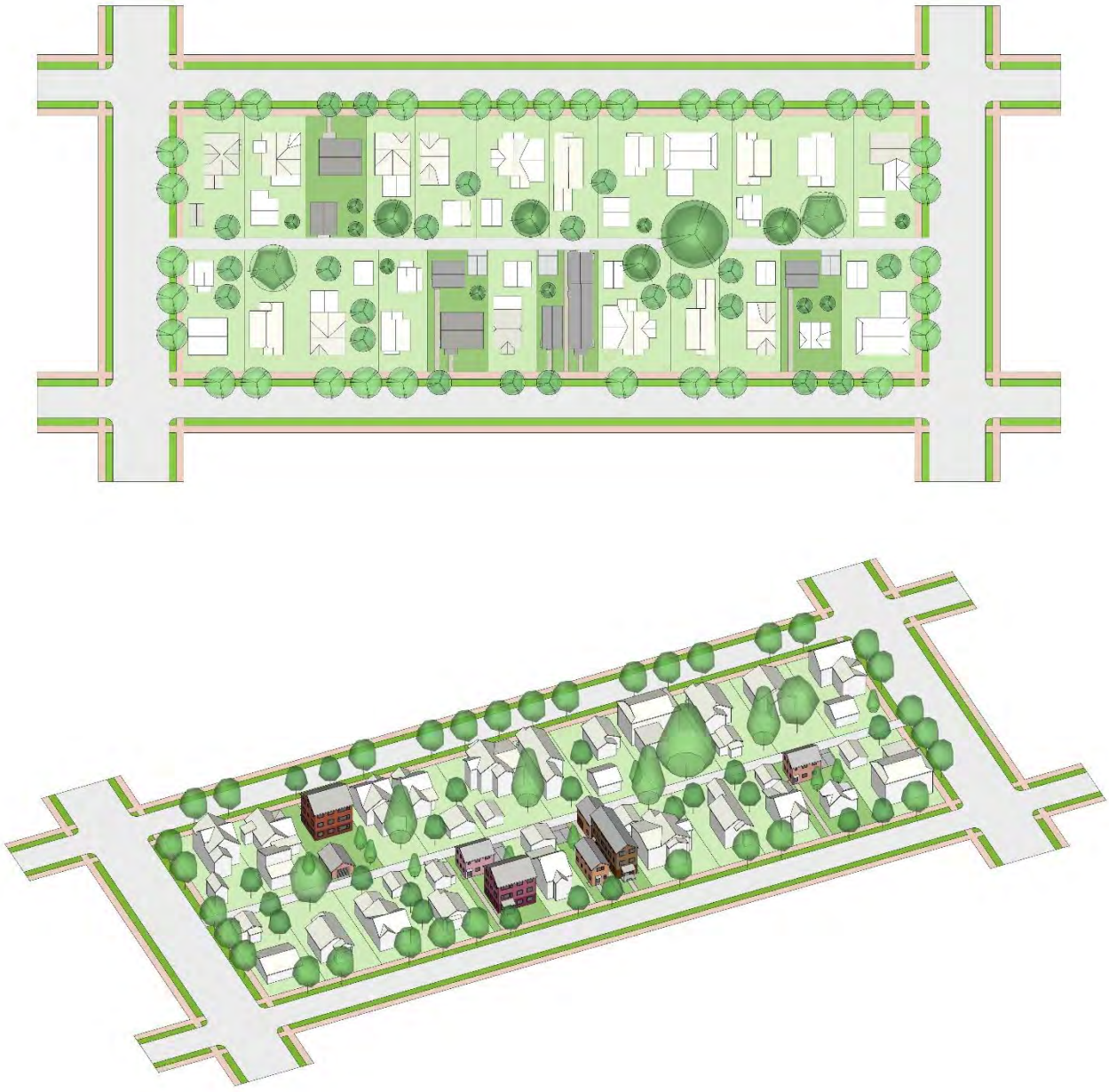
Exhibit 3.6-80, **Exhibit 3.6-81**, and **Exhibit 3.6-82** illustrate likely amounts and types of development in Neighborhood Residential zones over the next 20 years. Building types already allowed in these zones include attached and detached accessory dwelling units and in Residential Small Lot zones, multiple detached houses. The models show prototypical Seattle neighborhood blocks (no precise location) that include alleys, no alleys, and steeper terrain (with and without alleys).

Exhibit 3.6-79. Current Maximum Height Limits—Alternative 1: No Action



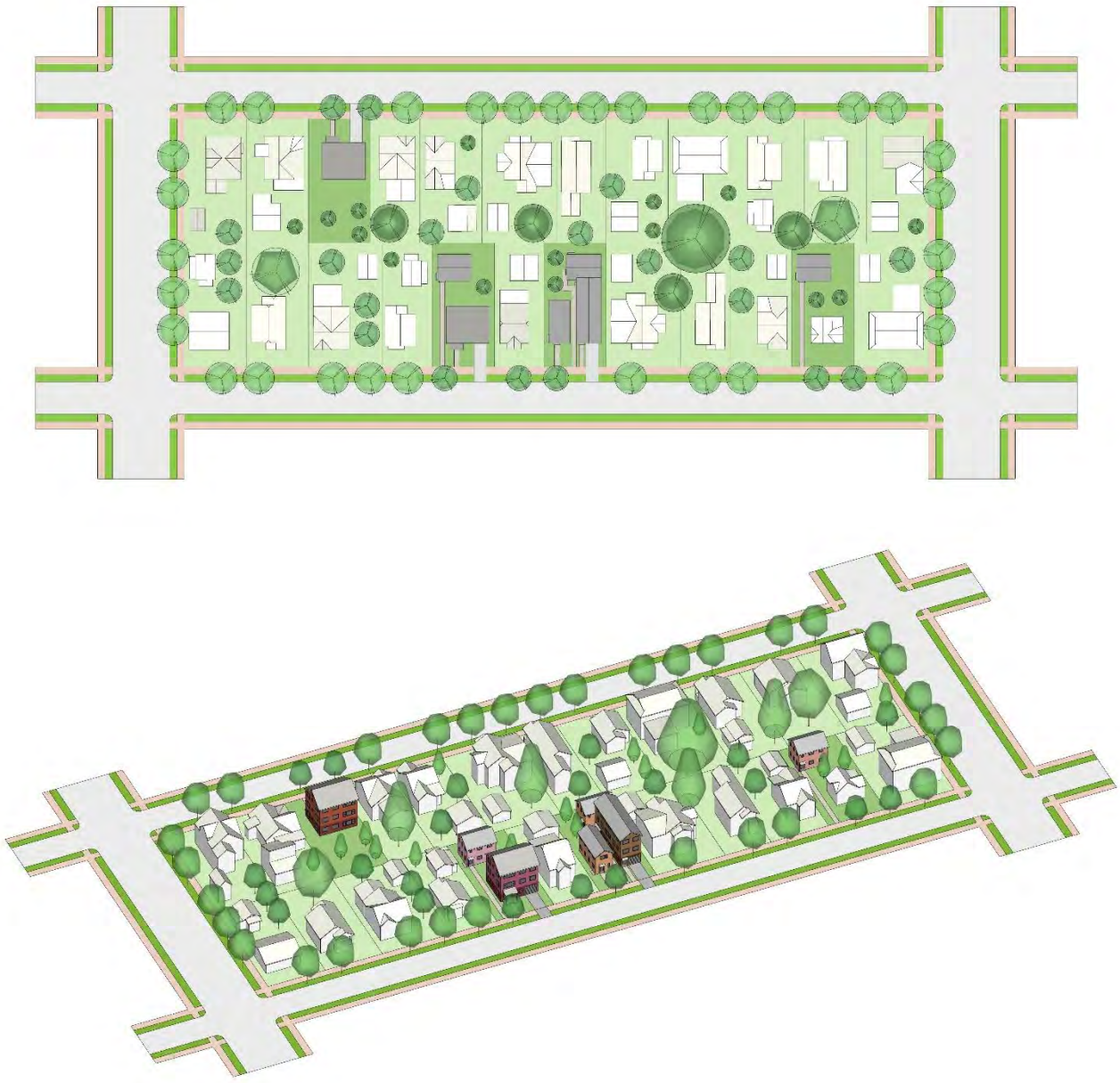
Note: See **Exhibit 2.1-1** in **Chapter 2** for a cross-walk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~A~~lternatives ~~2–5~~.
Source: City of Seattle, 2023; MAKERS, 2023.

Exhibit 3.6-80. Example Neighborhood Residential Block with an Alley Redevelopment—Alternative 1: No Action



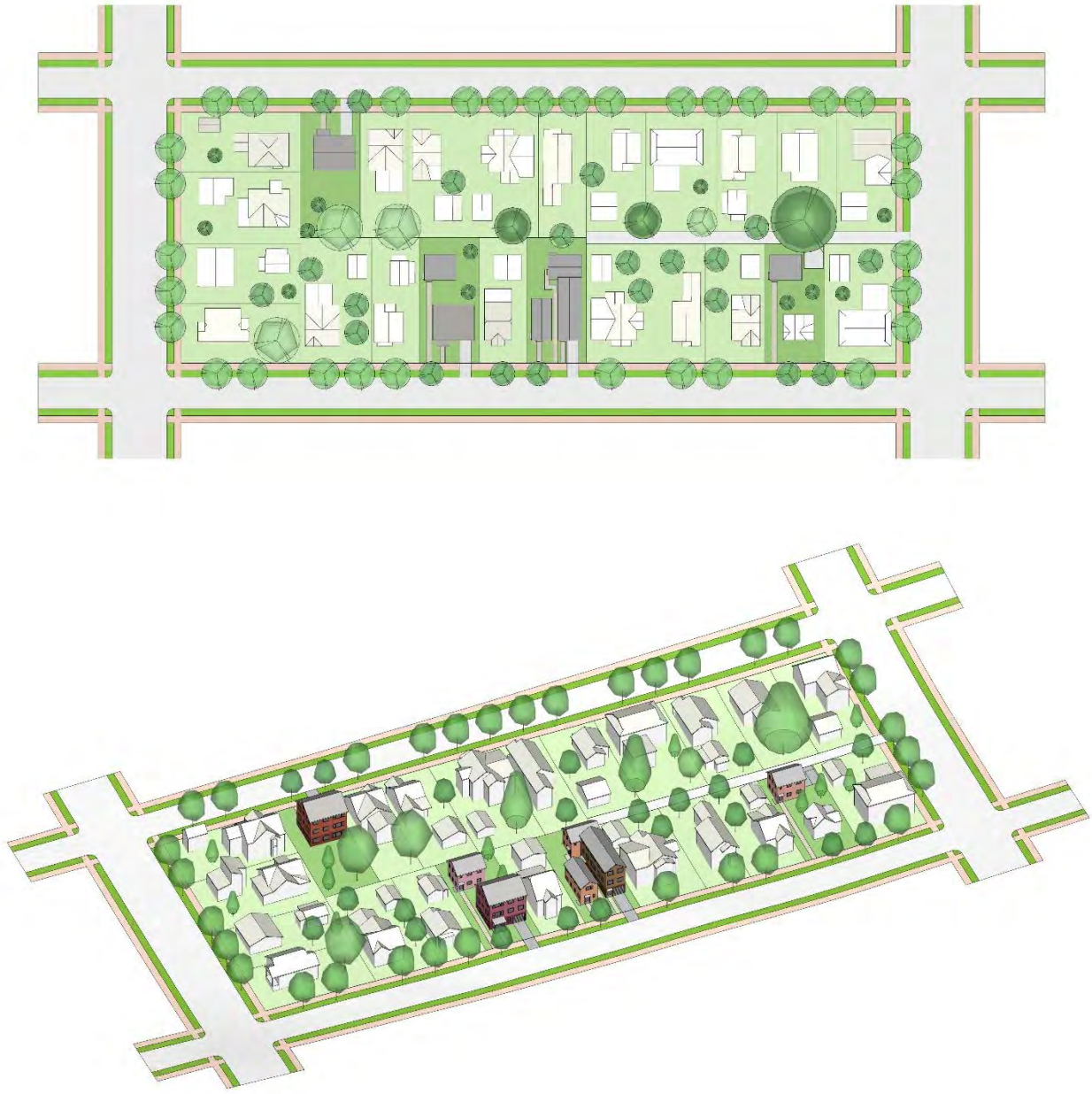
Note: This model illustrates potential redevelopment over the next 20 years under current Neighborhood Residential zoning. It is not intended to show the exact locations of development but that market-driven, incremental redevelopment over time would occur.
Source: City of Seattle, 2023; MAKERS, 2023.

Exhibit 3.6-81. Example Neighborhood Residential Block without an Alley Redevelopment—Alternative 1: No Action



Note: This model illustrates potential redevelopment over the next 20 years under current zoning. It is not intended to show the exact locations of development but that market-driven, incremental redevelopment over time would occur.
Source: City of Seattle, 2023; MAKERS, 2023.

Exhibit 3.6-82. Example Hilly Neighborhood Residential Block Redevelopment—Alternative 1: No Action



Note: This model illustrates potential redevelopment over the next 20 years under current zoning. It is not intended to show the exact locations of development but that market-driven, incremental redevelopment over time would occur.
Source: City of Seattle, 2023; MAKERS, 2023.

Transitions

Continued infill development in established centers and villages would likely create increasingly stark contrasts with surrounding lower-scale areas. In villages with existing RSL and low-rise transition zones, the effect may be less pronounced, but widespread development of townhouses and cottage clusters may show an abrupt shift as one crosses the urban village boundary. Development in centers and villages where parking is required would likely create more abrupt transitions to the low-density residential scale compared to areas where parking is not required.

Tree Canopy

No additional impacts to tree canopy are anticipated under Alternative 1 above those described under **Impacts Common to All Alternatives**.

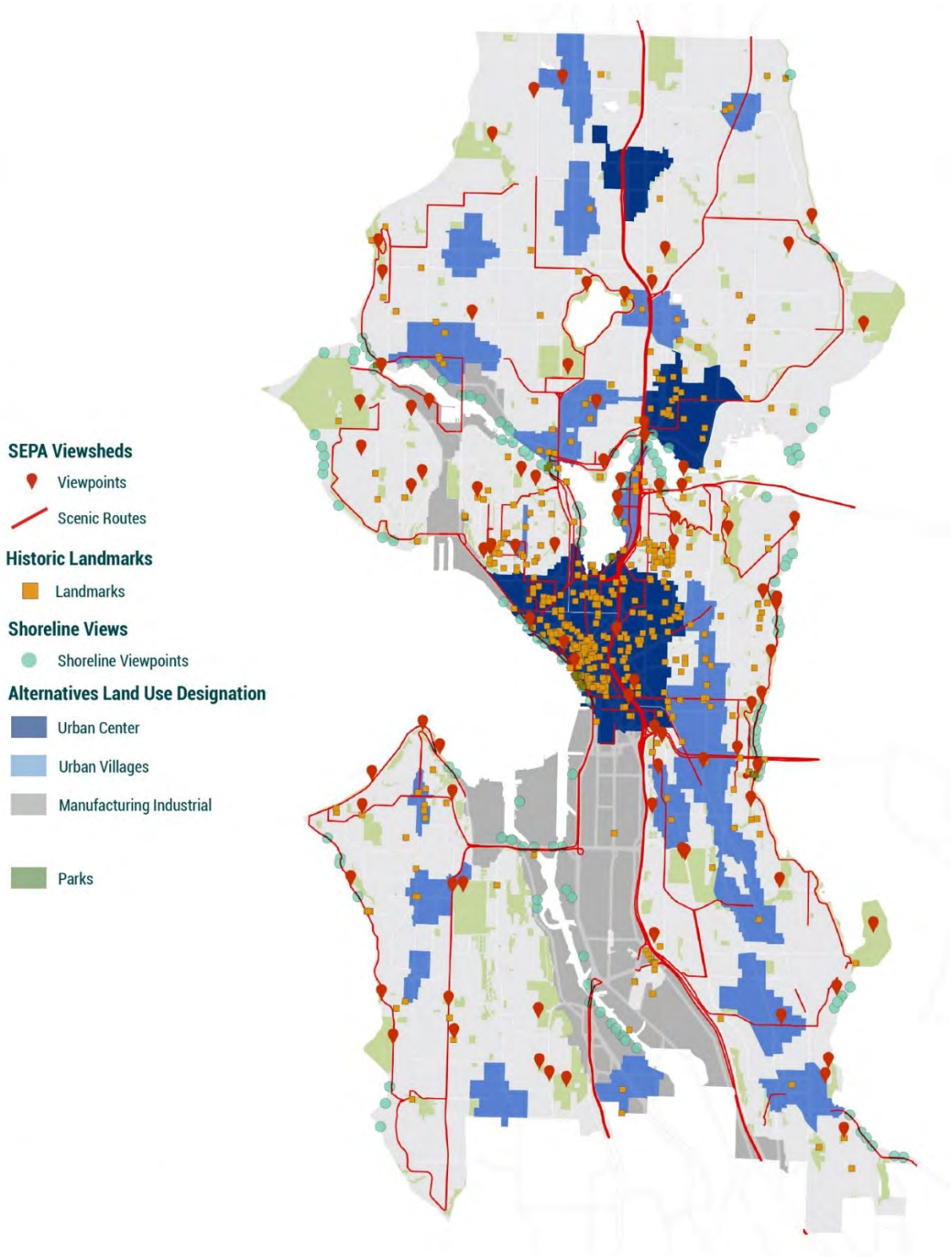
Shadows

Redevelopment in centers and villages would likely have taller heights than existing buildings, and thus cast longer shadows. Urban villages that sit on the north side of a hill, which could then cast shadows further, include northern Queen Anne, Admiral, and Othello. Nearly every center or village contains or is adjacent to parks, so redevelopment may cast longer shadows on parks. Also, urban villages with east-west-oriented main streets will see greater shadows on their central street and any associated public spaces. Most urban villages have north-south orientations, but a few have at least one central street running east-west, including Ballard (Market St) in Area 1, Wallingford (45th St) in Area 1, 23rd and Union-Jackson (Union St) in Area 5, Othello (Othello St and Graham St) in Area 8, and Rainier Beach (Henderson St) in Area 8.

Views

Future development under Alternative 1 would present limited disruptions to public views as growth would continue to concentrate in centers and villages, which tend to contain few viewpoints. Some exceptions include three viewpoints in Downtown that are not along the waterfront, one in Othello, two near West Seattle Junction, one at Ballard High School on the north side of Ballard, one in Bitter Lake, and Rainbow Point north of Green Lake-Roosevelt. See **Exhibit 3.6-83**.

Exhibit 3.6-83. Seattle Views Map—Alternative 1: No Action



Note: See **Exhibit 2.1-1** in **Chapter 2** for a cross-walk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~A~~lternatives ~~2–5~~.
Source: City of Seattle, 2023; MAKERS, 2023.

130th/145th Station Area

Land Use Patterns & Compatibility

Current Comprehensive Plan and zoning designations would be retained under the No Action Alternative in the 130th/145th Station Area. Zoning would continue to allow 3-story single-purpose residential development around the future light rail station at 130th and some 4- to 8-story multi-family uses near the 145th BRT station. Housing and job growth around both station areas would be modest and based on existing land use and zoning designations—194 housing units and 109 jobs would be added around NE 130th St and 646 housing units and 607 jobs would be added around 145th. Existing future land use and zoning designations in the station areas are mapped in **Exhibit 3.6-33** and **Exhibit 3.6-34**. Growth would increase activity unit density from 18.4 (existing) to 20.7 around NE 130th Street and from 35.3 (existing) to 64.9 around 15th and 145th. See **Exhibit 3.6-84**.

Exhibit 3.6-84. Station Area Share of Targets 2024-2044—Alternative 1

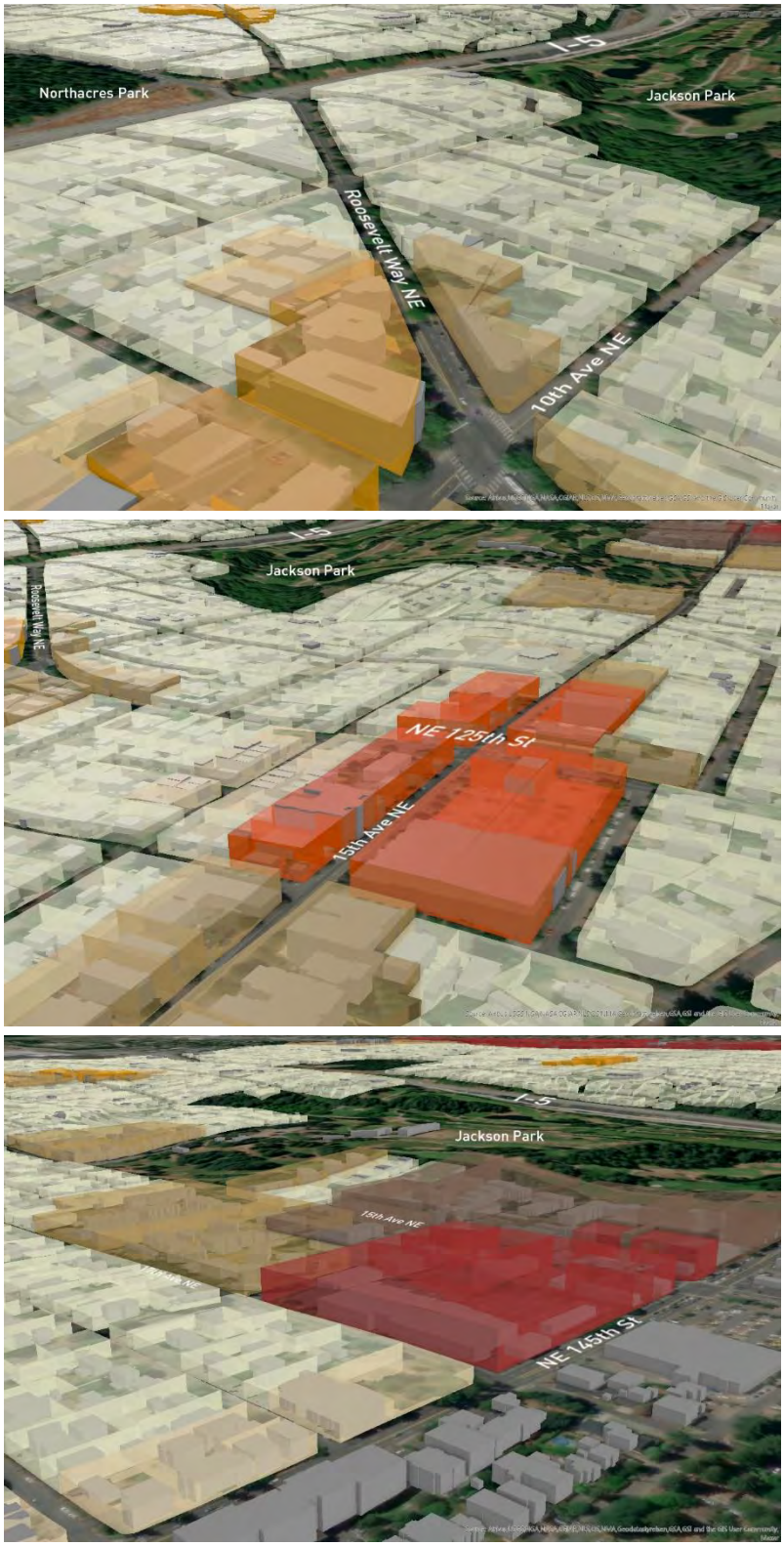
Location	New Housing Units*	New Jobs*	Existing AU/Ac.	Future AU/Ac.
NE 130th Street	194	109	18.4	20.7
15th & 145th	646	607	35.3	64.9

* The growth estimates consider the growth concept under the No Action Alternative within a common maximum boundary (Alternative 5).
Source: City of Seattle, 2023; BERK, 2023.

Urban Form

As seen in **Exhibit 3.6-79**, **Exhibit 3.6-85**, and **Exhibit 3.6-86**, the height around the 130th station would continue to be mostly 1- and 2-story buildings under Alternative 1, with the potential for some residential lots to see 3 stories. Under the existing zoning that offers limited capacity for development, few parcels would be likely to fully redevelop, though more may see additions (e.g., ADUs) and rebuilds. Though a light rail station would sit at the confluence of NE 130th St, Roosevelt Way NE, 5th Ave NE, and I-5, the station area would continue to feel like a low-density residential area and not like an active urban area. Few people would be within walking/biking/rolling distance of the station. Streets would not be activated with commercial uses, many streets would continue to lack sidewalks, and connectivity within the block bounded by 5th Ave NE, NE 130th St, 8th Ave NE, and Jackson Park would continue to be disjointed. In addition, 5th Ave NE would remain an uncelebrated public entry to a major transit investment (see **Exhibit 3.6-87)**. **Exhibit 3.6-85** and **Exhibit 3.6-86** illustrate potential redevelopment over 20 years; exact amount, locations, and design of redevelopment may vary. It would likely happen incrementally (i.e., site by site) as property owners choose to develop their property and/or aggregate properties for larger redevelopments.

Exhibit 3.6-85. 130th/145th Station Area Allowed Building Heights—Alternative 1: No Action



Note: This model illustrates allowed building heights under existing zoning. Building envelopes would also be influenced by FAR, setback, and upper story step back regulations.
Source: MAKERS, 2023.

Exhibit 3.6-86. 130th Station Area Massing Illustration—Alternative 1: No Action

Note: This model illustrates potential redevelopment over the next 20 years and building massings that maximize allowed FAR and heights while adhering to setback and zone transition regulations. Possible redevelopment is shown in pale yellow on an approximate amount of parcels likely to fully redevelop and is not intended to show exact locations of development but that market-driven, incremental redevelopment over time would occur. Additional modest changes (e.g., additions of ADUs, rehabilitation/remodels, and rebuilds) may occur under existing zoning.
Source: City of Seattle, 2023; MAKERS, 2023.

Exhibit 3.6-87. 5th Ave NE and 130th Station under Construction

Source: MAKERS, 2023.

Greater change would occur in the areas currently zoned for more intense development, including the 145th BRT station area and Pinehurst area. The 145th BRT station could incentivize further development in the area. The apartments southwest of the BRT station could redevelop from 3-story buildings to 5- to 8-story buildings. This area includes many established trees (see **Exhibit 3.6-88**). The east side of 15th Ave NE could redevelop with 75-foot tall buildings.

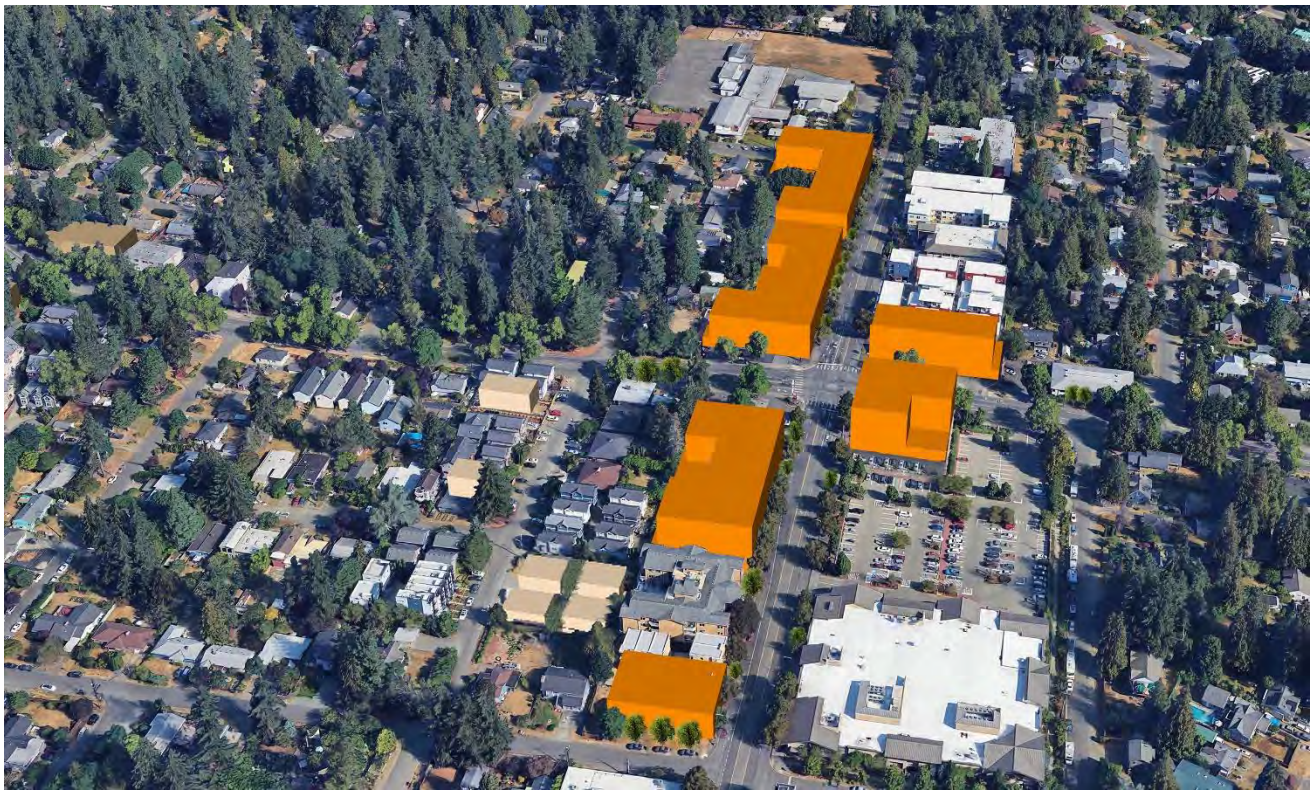
Exhibit 3.6-88. Existing 3-story Apartments Southwest of the 145th BRT Station

Source: MAKERS, 2023.

The Pinehurst area around 15th Avenue NE and NE 125th Street would continue to see similar development of 5-story mixed-use buildings in the NC3 zone along the main streets and 3- to 5-story residential buildings in the LR zones (**Exhibit 3.6-89**). With an urban center connector street designation on 15th Ave NE and NE 125th St, these streets would likely see street tree gaps filled with redevelopment, although trees may be in small landscape strips or grates with more space given to bus and pedestrian furniture, a protected bike lane, and street parking (if

remaining). Smaller streets off of the main arterials would meet Neighborhood Yield Streets standards, likely adding consistent landscape strips (6-8 feet wide) and street trees.

Exhibit 3.6-89. Pinehurst Massing Illustration—Alternative 1: No Action



Note: This model illustrates potential redevelopment over the next 20 years and building massings that maximize allowed FAR and heights while adhering to setback and zone transition regulations. Possible NC redevelopment is shown in orange and LR redevelopment in beige. It is not intended to show exact locations of development but that market-driven, incremental redevelopment over time would occur.
Source: City of Seattle, 2023; MAKERS, 2023.

Equity & Climate Vulnerability Considerations

Housing Type Variety and Choice

The housing type variety and housing choice under Alternative 1 would be similar to the existing pattern described under Citywide Affected Environment and **Impacts Common to All Alternatives**. Although there would continue to be new housing built over the next 20 years, the mix of housing types under Alternative 1 would likely continue to struggle serving a broad range of households.

Relationship to Active Transportation

Alternative 1's increase in density around transit and amenities would continue to support opportunities for active transportation as described in **Impacts Common to All Alternatives**.

Relationship to Social Wellbeing & Sociability

No additional impacts to social wellbeing and sociability are anticipated under Alternative 1 above those described under **Impacts Common to All Alternatives**. The focus on higher densities in select places could result in more high-rise buildings (as opposed to a greater variety of building types in Alternative 3, 4, and 5) to meet housing needs. This could result in small areas of apartments with small, less expensive units surrounded by large areas with high-cost detached homes. This division could limit social wellbeing and sociability. At the same time, these higher densities close to transit and amenities increase opportunities for active living, which in turn increases chances for sociability and wellbeing.

Climate Change

No additional impacts to climate change are anticipated under Alternative 1 above those described under **Impacts Common to All Alternatives**. Growth under the No Action Alternative would be concentrated in existing centers and villages away from most hazards. The No Action Alternative would not include the new Environment and Climate Element with mitigation and adaptation strategies or policies regarding tree canopy protection or enhancement and critical area regulations.

Impacts of Alternative 2: Focused

Land Use Patterns & Compatibility

Alternative 2 would designate additional areas of focused growth called neighborhood centers to create more housing around shops and services (see **Exhibit 2.4-10**). Neighborhood centers would be similar to urban centers in that they would allow a wide range of housing types and commercial uses with more compact building forms, but with a smaller geographic size and lower intensity of allowed development. About 3,000 acres currently in neighborhood residential zoning would be designated as neighborhood centers.

Alternative 2 studies total housing growth of 100,000 housing units (20,000 more than the No Action Alternative) to account for potential additional housing demand that could be met within the neighborhood centers. As described under **Impacts Common to All Alternatives**, most new growth would be focused within the regional and urban centers currently characterized by higher densities and a more diverse mix of uses than other areas of the city. Housing growth within the regional and urban centers would be the same as the No Action Alternative. Activity levels and activity units per acre would be similar to those described under the No Action Alternative, although future activity units per acre would be marginally lower under Alternative 2 as a result of the slight jobs shift to neighborhood centers (see **Exhibit 3.6-90**). Land use patterns and potential compatibility impacts within the regional and urban centers and at their periphery (where more intense development could occur adjacent to low-intensity uses outside the center) would be similar to those described under **Impacts Common to All Alternatives**. Compared to the No Action Alternative, adverse compatibility impacts at the periphery of regional and urban centers

could be lessened where a new neighborhood center with moderate-scale development abuts an existing center designation (see also the **Transitions** section below).

Under Alternative 2, the new neighborhood centers would accommodate the second highest share of anticipated housing growth behind regional centers (see **Chapter 2**). About half (49%) of housing growth in neighborhood centers would be directed into neighborhood centers with low displacement risk in areas 1 and 2. Area 4 would still receive the greatest overall share of new housing growth (19%) followed by Area 1 and Area 2 (about 18% each). A small number of jobs and commercial space would also shift from the larger centers towards the new neighborhood centers to reflect local demand consistent with the distribution of new housing. All neighborhood centers already contain areas zoned for commercial or mixed-use development. Additional jobs and commercial space in these areas, however, could increase more quickly due to the local demand from new housing.

Over time, overall land use patterns within the neighborhood centers would become more dense and mixed use. This could result in localized land use compatibility impacts within the neighborhood centers or with adjacent urban neighborhood areas where newer development is of greater height and intensity than existing development (see also the **Urban Form** section below). Such impacts would be mitigated through application of the City's existing development regulations and design review process. The SMP would also continue to apply where new neighborhood centers overlap the shoreline jurisdiction (e.g., north of Green Lake in Area 1, on Alki in Area 6, and on Lake Washington in Area 5).

Exhibit 3.6-90. Future Activity Units (AU)—Alternative 2

Center	Existing AU/Ac.	Alt. 1 AU/Ac.	Alt. 2 Acres	Alt. 2 AU	Alt. 2 AU/Ac.
Regional Centers[1]					
Downtown	377.4	473.2	952	448,614	471.2
First Hill/Capitol Hill	139.5	163.4	916	149,645	163.3
University Community	54.5	70.2	753	52,773	70.0
South Lake Union	236.7	344.1	340	116,153	341.8
Uptown	131.3	161.3	333	53,695	161.1
Northgate	57.3	75.1	412	30,860	74.9
Hub Urban Centers[1]					
Ballard	67.7	96.9	495	47,906	96.7
Bitter Lake Village	44.0	55.4	364	20,086	55.2
Fremont	71.9	88.1	214	18,883	88.0
Lake City	57.6	75.4	142	10,700	75.2
Mt Baker	36.0	47.4	491	23,196	47.2
West Seattle Junction	70.4	100.2	269	26,927	100.0
Residential Urban Centers[1]					
23rd & Union-Jackson	38.9	46.5	625	29,059	46.5
Admiral	49.2	60.4	98	5,935	60.3
Aurora-Licton Springs	44.1	51.4	327	16,784	51.3

Center	Existing AU/Ac.	Alt. 1 AU/Ac.	Alt. 2 Acres	Alt. 2 AU	Alt. 2 AU/Ac.
Columbia City	33.9	46.1	335	15,411	46.0
Crown Hill	25.3	31.4	271	8,499	31.4
Eastlake	70.2	82.0	199	16,329	82.0
Green Lake	70.6	87.4	109	9,495	87.3
Greenwood-Phinney Ridge	84.5	101.6	94	9,548	101.4
Madison-Miller	65.3	85.1	145	12,357	85.0
Morgan Junction	34.1	41.6	113	4,706	41.5
North Beacon Hill	28.1	34.5	267	9,175	34.4
Othello	23.7	29.0	499	14,503	29.1
Rainier Beach	23.0	26.0	346	9,007	26.0
Roosevelt	61.4	81.2	170	13,808	81.2
South Park	14.7	18.5	263	4,847	18.4
Upper Queen Anne	89.5	110.5	53	5,806	110.3
Wallingford	42.2	51.5	258	13,258	51.4
Westwood-Highland Park	27.9	32.6	275	8,948	32.5

1 See **Exhibit 2.1-1** in **Chapter 2** for a cross-walk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~A~~lternatives ~~2-5~~.
Note: Activity units (AU) is the sum of residential population and jobs. Assumes an average household size of 2.05 per the King County Growth Management Planning Council. Highlighted hub and residential urban ~~villages~~ centers fall outside King County's countywide center designation criteria of 160–500 acres or below the minimum 18 existing AU or 30 future AU per acre. MIC designation criteria from PSRC does not include an AU density threshold.
Sources: City of Seattle, 2023; BERK, 2023.

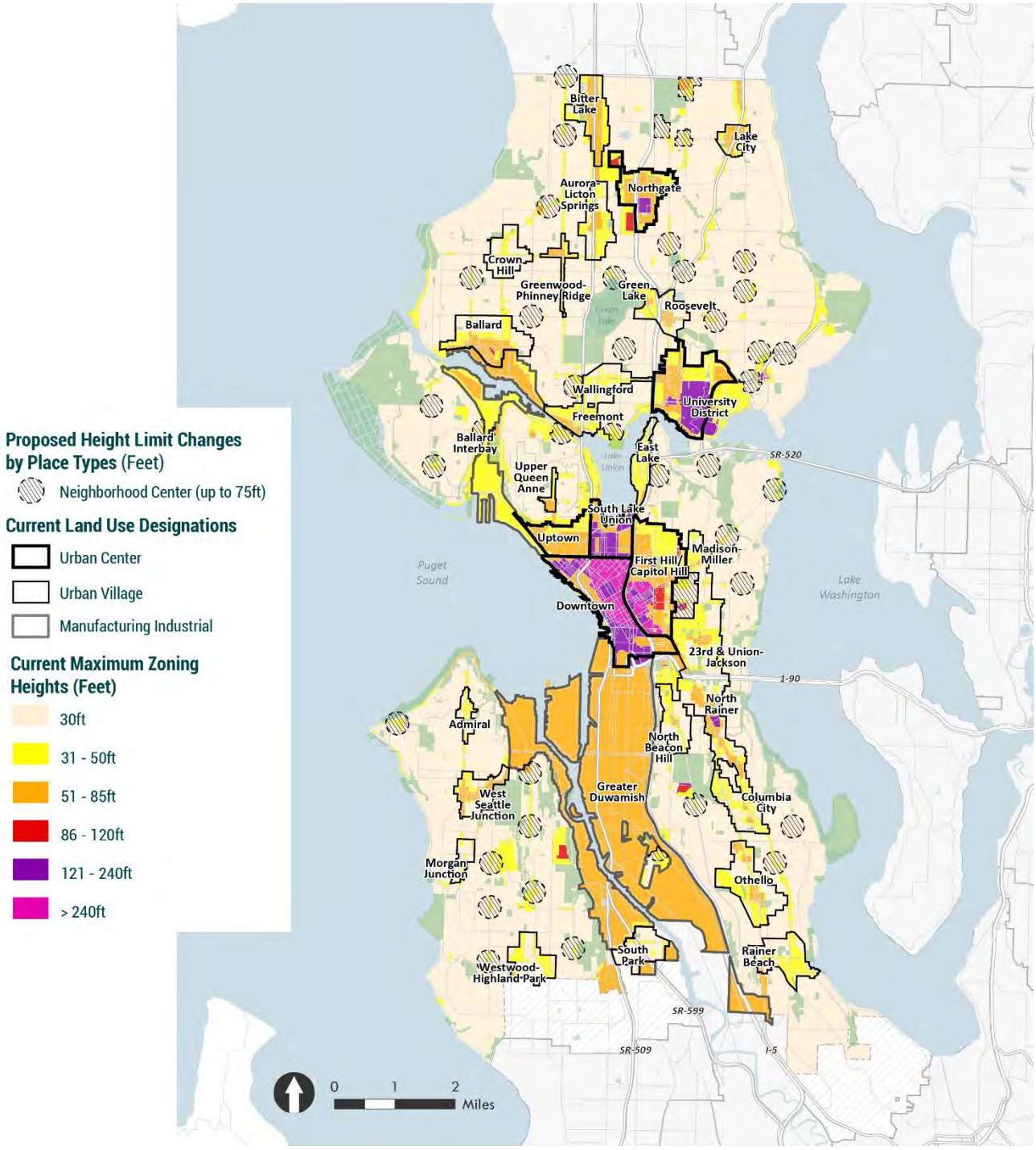
Urban Form

Height, Bulk, & Scale

Neighborhood centers could contain a mix of residential and mixed-use development from townhouses to 7-story apartments and mixed-use buildings. See **Exhibit 3.6-91**. Over time, overall building height and bulk in the new neighborhood center areas would likely increase with new development. Areas that are currently primarily 1- and 2-story buildings would be allowed to develop up to 5- to 8-story buildings. Localized impacts could occur as the areas transition to a more intense development pattern, with this conflict most likely being more pronounced in areas where neighborhood centers are being added.

Alternative 2 could also result in height, bulk, and scale impacts between properties in neighborhood centers where areas that are predominately 1- and 2-story detached houses might experience gradual redevelopment with multifamily homes as tall as 7 stories. Differences in massing on adjacent properties are not likely to be significantly more intense than those already occurring in many regional and urban centers but would occur in new areas.

Exhibit 3.6-91. Proposed Height Limit Changes—Alternative 2



Note: See **Exhibit 2.1-1** in **Chapter 2** for a cross-walk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~A~~lternatives ~~2–5~~.
Source: City of Seattle, 2023; MAKERS, 2023.

Transitions

Alternative 2 introduces a new kind of infill area: neighborhood centers. These will bring some moderate-scale development at neighborhood locations where it is not currently allowed, reducing the existing contrast between regional and urban centers (that see widespread development of large buildings) and surrounding areas (with broad areas that see minimal development). Designating neighborhood centers could create new contrasts in building heights and intensity with surrounding areas in the places where they are applied.

Tree Canopy

Increased development pressure in previously low-density residential zones may displace trees on private property faster, while adding street trees.

Shadows

In neighborhood centers, the increase in height limits from 30 feet to 75 feet would mean that existing single-story buildings could be replaced with taller and wider buildings. These would cast longer shadows over a greater portion of the day. As noted in the **Affected Environment**, building shadows can be considered positive for climate adaptation to reduce summertime heat, but can be negative for human health and wellbeing (especially during winter) and the health of existing trees if accustomed to full sun.

Shadows on Public Parks

Neighborhood center upzones that increase height limits above 30 feet that could result in increased shadows on public parks including:

- NE 145th and 15th Ave NE on Jackson Park
- 130th Station Area on Jackson Park
- Holman Rd NW and 3rd Ave NW on Carkeek Park
- 15th Ave NE and Lake City Way on Maple Leaf Reservoir Park
- Sand Point Way and 50th Ave NE on Burke-Gilman Trail and Playground Park
- NE 45th St/Sand Point Way and 36th Ave NE on Burke-Gilman Trail
- Tangletown on Keystone Place
- Lawton Park on Discovery Park
- Magnolia on Magnolia Playfield
- Madison Park on Madison Park and Madison Park Beach
- Washington Park/Broadmoor on Broadmoor Golf Club
- Madrona on Madrona Playground and Alvin Larkins Park
- Alki on Alki Beach Park
- North Delridge on Dragonfly Garden and Pavilion

- Delridge Way SW and SW Brandon St on Cottage Grove Park, Delridge P-Patch Community Gardens, and Greg Davis Park
- Delridge Way SW and Sylvan Way SW on Delridge and Myrtle
- 9th Ave SW and SW Henderson St on Highland Park Playground and Westcrest Park
- Beacon Ave S and S Columbian Way on Jefferson Park Golf Course

Shadows on the Delridge P-Patch are important to note because of their potential impact to plant productivity.

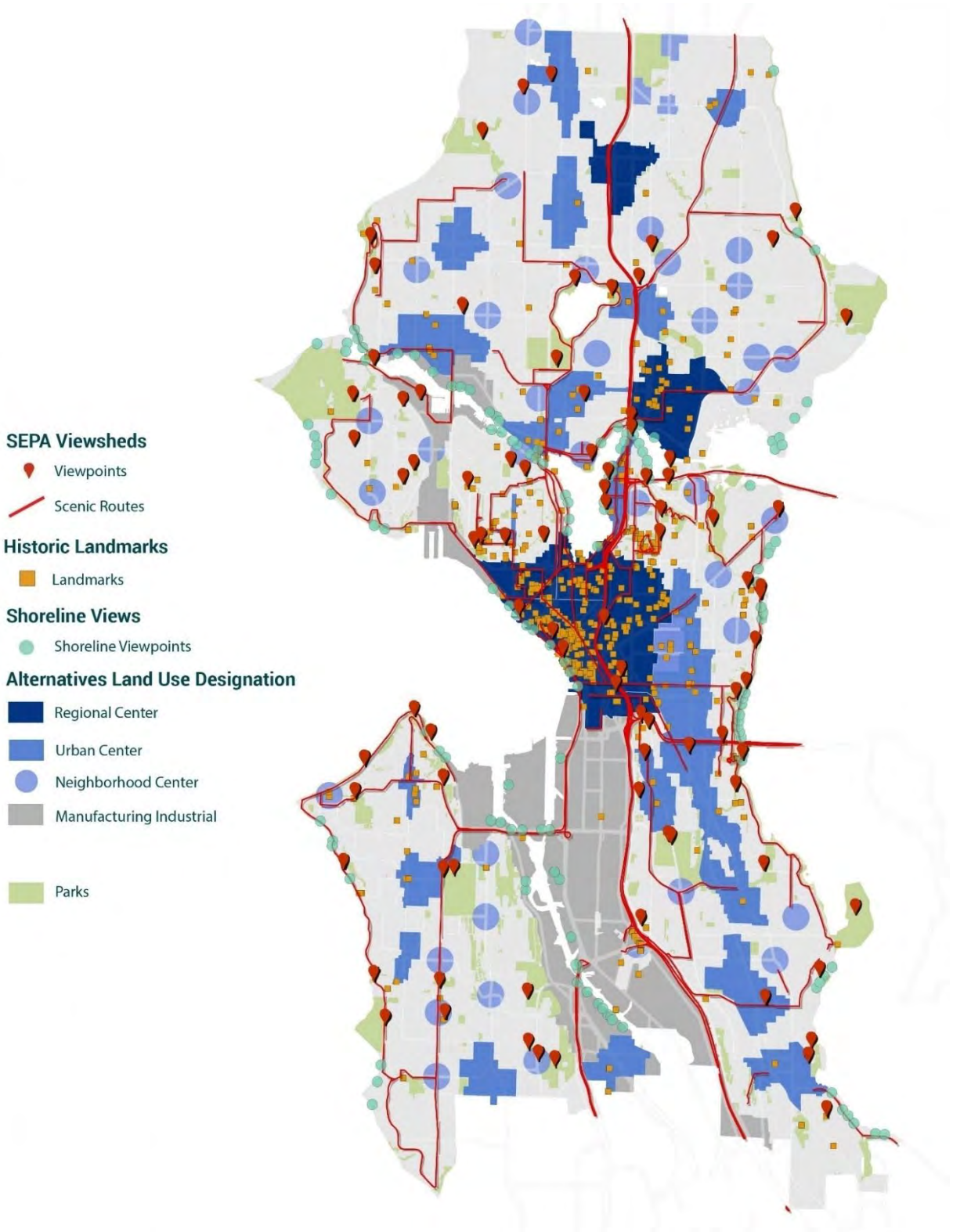
Shadows on Public Rights-of-Way

Impacts would be greatest along east-west-oriented neighborhood main streets with taller developments on the south side, though they would impact any orientation to varying degrees. See **Exhibit 3.6-74**, **Exhibit 3.6-75**, and **Exhibit 3.6-76** for shadow patterns at various times and seasons with different building heights. Many neighborhood main streets have 1-story existing buildings, so the increase to 3- or 5-stories would have noticeable impacts on shadows to the sidewalks. Street trees accustomed to full sun, especially if shorter than new buildings, may be impacted. Selection of future street trees and vegetation would need to consider future solar impacts.

Views

The expected development pattern in neighborhood centers is unlikely to significantly impact protected views beyond the potential impacts of the No Action Alternative. Most public viewpoints, including shorelines and landmarks, are not located within the neighborhood centers, and no zoning changes are proposed between most viewpoints and the landmark view. See **Exhibit 3.6-92**.

Exhibit 3.6-92. Seattle Views Map—Alternative 2



Note: See **Exhibit 2.1-1** in **Chapter 2** for a cross-walk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~A~~lternatives ~~2–5~~.
Source: City of Seattle, 2023; MAKERS, 2023.

130th/145th Station Area

Land Use Patterns & Compatibility

Under Alternative 2, there would be three neighborhood centers designated in the station area near 130th Street and Roosevelt Way to the east of I-5, 125th Street and 15th Ave (Pinehurst), and 145th Street and 15th Ave. Zoning to implement the centers would include a combination of Low-rise Residential, Midrise Residential, and Neighborhood Commercial (NC3). Future development would be more mixed use near the 145th Station Area (with NC3) compared to the No Action Alternative and heights would be greater at up to 7 stories, particularly along the 145th Station Area.

Both stations areas would see more growth clustered in the newly designated neighborhood centers under Alternative 2 compared to the No Action Alternative. However, housing and job growth would be relatively modest—1,049 housing units and 284 jobs would be added around 130th Street and 1,159 housing units and 695 jobs would be added around 145th Street. Growth would increase activity unit density from 18.6 (existing) to 29.9 around NE 130th Street and from 35.7 (existing) to 83.3 around 15th and 145th. Land use patterns and compatibility impacts would be similar to those described above within other neighborhood centers.

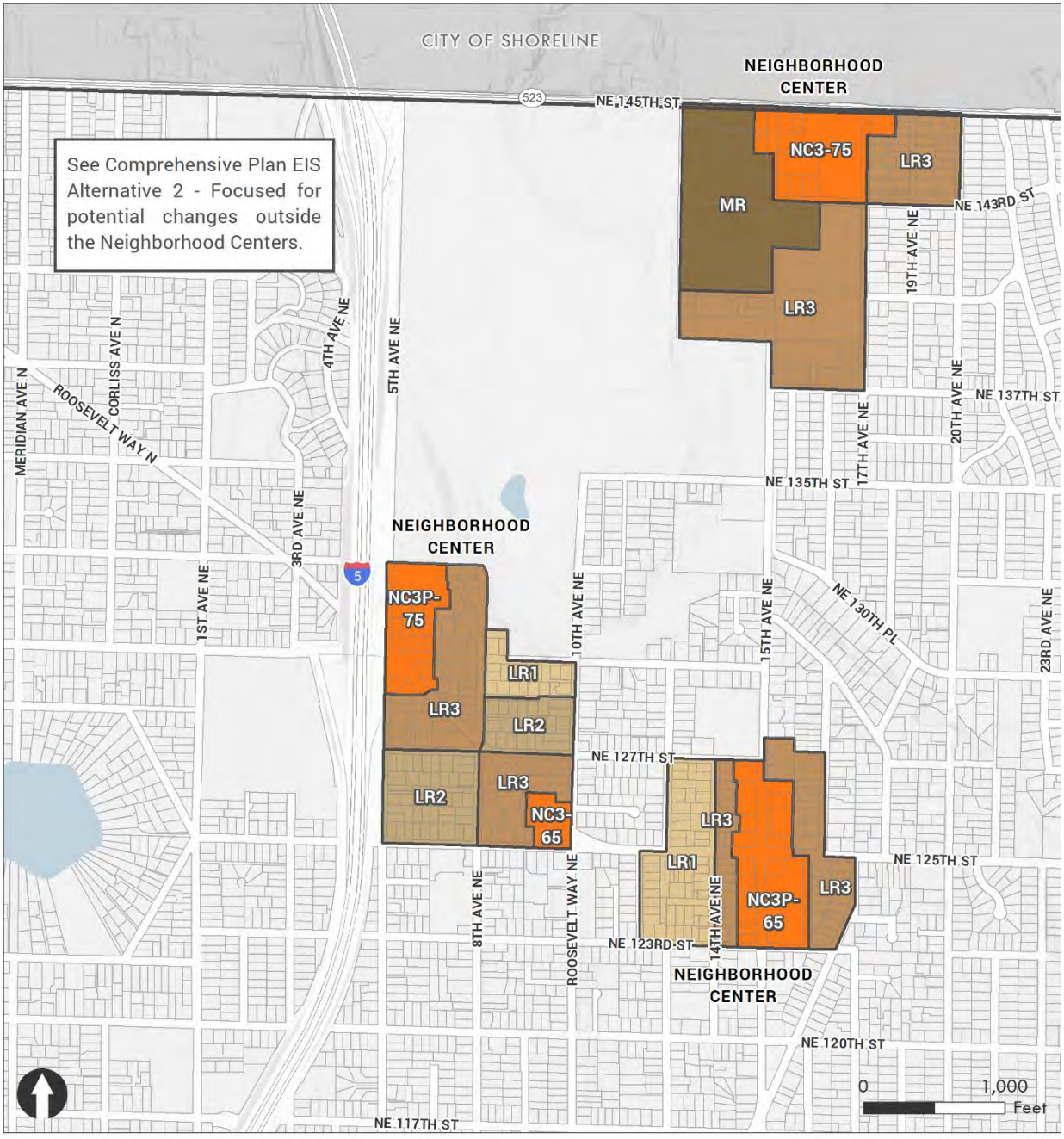
See **Exhibit 3.6-93** and **Exhibit 3.6-94**.

Exhibit 3.6-93. Station Area Share of Targets 2024-2044—Alternative 2

Location	Place Type*	New Place Acres**	New Housing Units**	New Jobs**	Existing AU/Ac.	Future AU/Ac.
NE 130th Street	Neighborhood Center	52	1,049	284	18.4	29.6
15th & 145th	Neighborhood Center	65	1,159	695	35.3	82.4

* See **Exhibit 2.1-1** in **Chapter 2** for a cross-walk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~A~~lternatives ~~2-5~~.
** New place acres are the total acres within the neighborhood center boundary under Alternative 2. The growth estimates consider the proposed growth concept under Alternative 2 within a common maximum boundary (Alternative 5). The 130th Street and Pinehurst Neighborhood Centers in Alternative 2 are both part of the 130th Street Urban Center in Alternative 5 and so are listed under NE 130th Street in this table.
Source: City of Seattle, 2023; BERK, 2023.

Exhibit 3.6-94. 130th/145th Station Area Zoning Concept—Alternative 2



Note: See **Exhibit 2.1-1** in **Chapter 2** for a cross-walk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~A~~lternatives ~~2–5~~.
Source: City of Seattle, 2022; BERK, 2022.

Urban Form

Height, bulk, and scale. The station areas could see extensive changes to height, bulk, and scale as a result of proposed zoning capacity increases combined with proximity to the new light rail station. Building heights immediately next to the 130th light rail station would likely redevelop from primarily 1- and 2-story buildings up to 7 stories. The heights of buildings surrounding the 130th station would develop into a mix of 3-story townhomes and 4- and 5-story buildings. **Exhibit 3.6-95** and **Exhibit 3.6-96** illustrate potential redevelopment over 20 years; exact amount, locations, and design of redevelopment may vary. It would likely happen incrementally (i.e., site by site) as property owners choose to develop their property and/or aggregate properties for larger redevelopments.

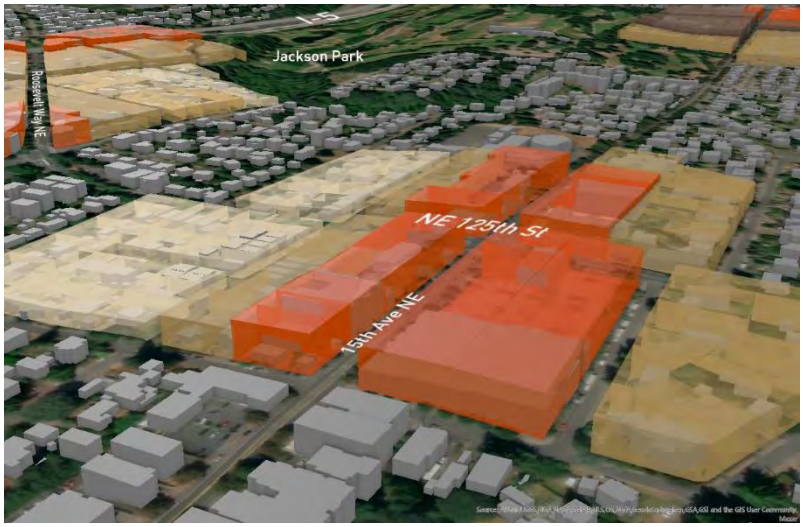
The core of the 145th station area would likely redevelop into a mixed-use node with buildings up to 7 stories, while heights in the surrounding area would be similar to the No Action Alternative. Zoning around Pinehurst would allow for more multi-family than the No Action Alternative but new development would likely continue to see a mix of 3- to 5-story buildings.

Specific impacts include:

- **Urban design and active transportation: Intersite connectivity.** The block bounded by 5th Ave NE, NE 130th St, 8th Ave NE, and Jackson Park is approximately 660 feet by 690 feet and currently has no through access; NE 131st Place is a private access drive and 8th Ct NE is a short dead-end right-of-way. With redevelopment, the lack of an existing finer-grained and connected network of streets means that redevelopment, without requirements for greater connectivity, could result in development that is fractured and doesn't have great connections to existing streets and the light rail station.
- **Street-level community building: Lack of focused public realm.** Similarly, because of the limited street grid, piecemeal redevelopment could result in individual, unrelated, disconnected developments lacking a cohesive orientation toward public streets, a focused public realm, or opportunities for shared social gathering. Building entries could be hidden or facing different directions within a block accessed by long, private driveways.
- **Street level community building: Affordable commercial space.** 15th Ave NE, both in the 145th station area and Pinehurst, as well as NE 125th St at 15th Ave NE and Roosevelt Way NE south of NE 125th St, would likely see greater levels of activity, enlivening the street level experience. However, many small commercial spaces currently exist in strip malls or in adapted houses in these areas. With redevelopment, maintaining affordable commercial space in the area for local and BIPOC-owned businesses may be challenging, impacting the social and cultural ties to these neighborhood centers.

Transitions. Development of high-intensity buildings in the immediate vicinity of the 130th station area under Alternative 2 may create abrupt local transitions in scale between existing detached houses and new larger construction. Over time, an evolution of the station area into more consistently intensely used land, combined with smaller scale redevelopment in surrounding low-rise zones would likely soften these transitions. See **Exhibit 3.6-96** and **Exhibit 3.6-97**.

Exhibit 3.6-95. Proposed 130th/145th Station Area Allowed Building Heights—Alternative 2

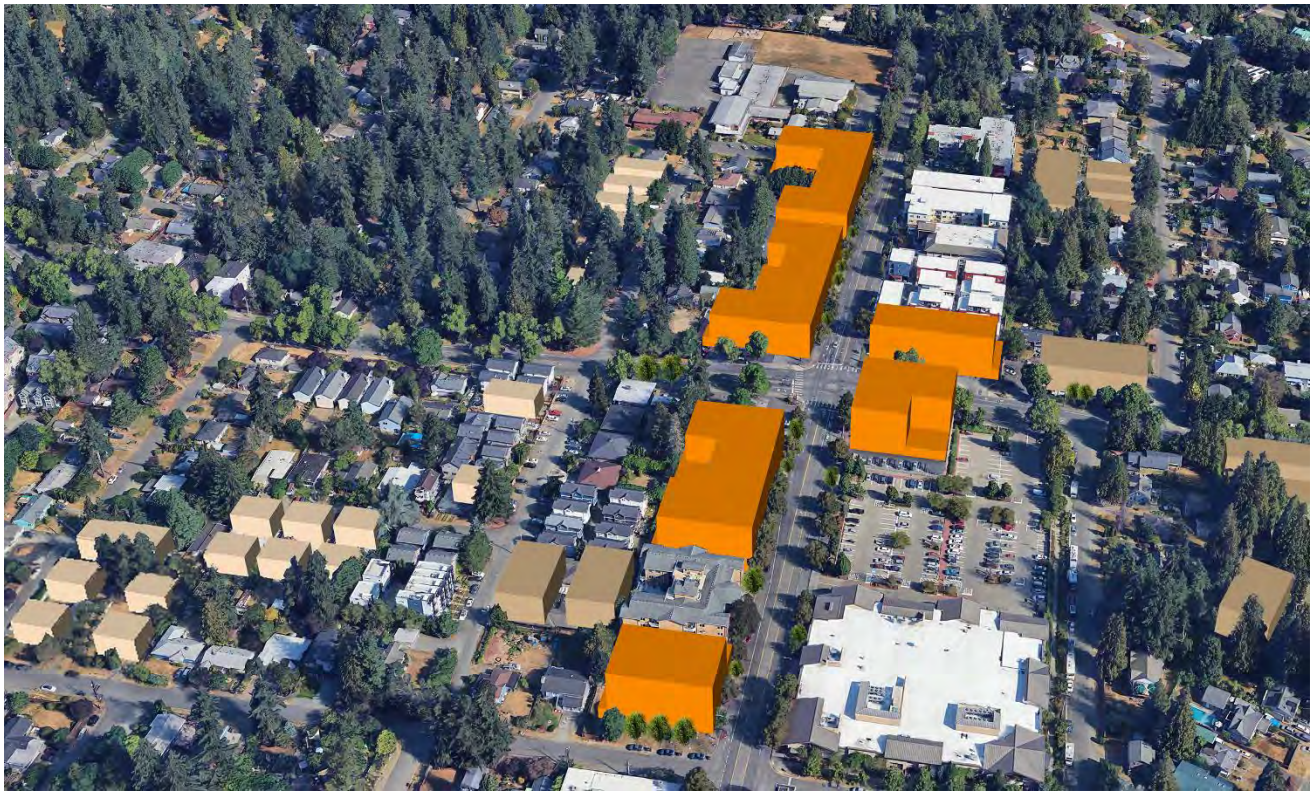


Note: This model illustrates proposed building height limits in proposed neighborhood centers. Building envelopes would also be influenced by FAR, setback, and upper story step back regulations.
Source: City of Seattle, 2023; MAKERS, 2023.

Exhibit 3.6-96. 130th Station Area Massing Illustration—Alternative 2

Note: This model illustrates potential redevelopment over the next 20 years and building massings that maximize allowed FAR and heights while adhering to setback and zone transition regulations. Possible NC redevelopment is shown in orange and LR redevelopment in beige. It is not intended to show exact locations of development but that market-driven, incremental redevelopment over time would occur.
Source: City of Seattle, 2023; MAKERS, 2023.

Exhibit 3.6-97. Pinehurst Massing Illustration—Alternative 2



Note: This model illustrates potential redevelopment over the next 20 years and building massings that maximize allowed FAR and heights while adhering to setback and zone transition regulations. Possible NC redevelopment is shown in orange and LR redevelopment in beige. It is not intended to show exact locations of development but that market-driven, incremental redevelopment over time would occur.
Source: City of Seattle, 2023; MAKERS, 2023.

Tree Canopy. Similar to the No Action Alternative, any redevelopment would fill gaps in street trees along the frontage. In the station areas, large-scale redevelopment would significantly impact the existing tree canopy. Alternatively, if trees are protected "exceptional" trees, development capacity would be constrained.

Shadows on Public Parks. Increased height limits above 30 feet in the NE 145th and 15th Ave NE and 130th Station Area neighborhood centers could result in increased shadows on Jackson Park. However, the human experience of the park would not significantly change as tall evergreens already shade the park boundaries.

Views. The I-5 scenic corridor traverses the 130th Station Area. However, I-5 in this area is below grade and/or has noise barrier walls blocking much of the view. In addition, the light rail infrastructure (above ground) is visually prominent and blocks or impacts much of the eastward views. More buildings would be visible, especially on the east side of I-5 at NE 130th St/Roosevelt Way NE, but they would be a minor part of the view.

Equity & Climate Vulnerability Considerations

Housing Type Variety and Choice

The housing type variety and housing choice under Alternative 2 would be similar to the existing pattern described under **Affected Environment** and **Impacts Common to All Alternatives**.

Relationship to Active Transportation

Alternative 2 would introduce neighborhood centers, which are similar to urban centers but are smaller geographically. The increase in housing types and commercial uses in a more compact urban form could increase the amount of people walking and rolling to their destinations, both in the neighborhood center and to those adjacent to it, helping mitigate climate change.

Relationship to Social Wellbeing & Sociability

Impacts would be similar to Alternative 1, but an increase in compact urban form of more housing and commercial uses could provide more spaces and locations where social interactions can happen than under Alternative 1. See also **Section 3.8 Population, Housing, & Employment** for a discussion of cultural displacement risk and its potential impact on wellbeing.

Climate Change

No additional impacts to climate change are anticipated under Alternative 2 above those described under **Impacts Common to All Alternatives**. Growth under Alternative 2 would be concentrated in existing centers and the new neighborhood centers away from most hazards. Like the other action alternatives, Alternative 2 would include a new Environment and Climate Element with mitigation and adaptation strategies as well as policies regarding tree canopy protection or enhancement and critical area regulations. See Alternative 2's **Tree Canopy** section for impacts related to trees, which would influence urban heat and potentially flooding.

Impacts of Alternative 3: Broad

Land Use Patterns & Compatibility

Alternative 3 would allow a wider range of low-scale housing options—like triplexes and fourplexes—in all urban neighborhood areas (see **Exhibit 2.4-16**). This alternative studies total housing growth of 100,000 housing units (20,000 more than the No Action Alternative) to account for the potential additional housing demand that could be met with broad zoning changes. As described under **Impacts Common to All Alternatives**, most new growth would be focused within the regional and urban centers currently characterized by higher densities and a more diverse mix of uses than other areas of the city. Housing growth within the regional and urban centers would be the same as the No Action Alternative and Alternative 2. Activity levels and activity units per acre would be similar to those described under Alternative 2 as a result of the slight jobs shift to urban neighborhood areas (see **Exhibit 3.6-98**). Land use patterns and potential compatibility impacts within the regional and urban centers would be similar to those described under **Impacts Common to All Alternatives**. Compared to the No Action Alternative, adverse compatibility impacts at the periphery of most centers could be minimized as the abutting urban neighborhood areas redevelop with denser development patterns (see also the **Transitions** section below).

Under Alternative 3, urban neighborhood areas would accommodate the second highest share of anticipated housing growth behind regional centers (see **Chapter 2**). More than half (53%) of the additional new housing growth in urban neighborhood areas would be directed into areas 1 and 2. However, this growth would be more spread throughout the analysis areas rather than into the focused neighborhood center nodes of Alternative 2. Area 2 would receive the greatest overall share of new housing growth under Alternative 3 (20%), followed by Area 4 (19%) and Area 1 (18%). A small number of jobs and commercial space would shift from the larger centers towards urban neighborhood areas to reflect local demand consistent with the distribution of new housing. Alternative 3 also allows more flexibility for commercial space in these areas (such as allowing corner stores or making it easier to operate at-home businesses) to support the development of neighborhoods where more people can walk to everyday needs.

Over time, overall land use patterns would become denser within the urban neighborhood areas. Most of this development would continue to be residential in nature with limited additional local retail and commercial activity. This could result in localized land use compatibility impacts within the urban neighborhood areas where the height or intensity of new development exceeds existing development (although the maximum height allowed for market-rate development in these zones would remain 30 feet; see also the **Urban Form** section below). Additional flexibility for commercial spaces could also result in localized land use compatibility impacts where commercial uses result in noise, traffic, or other impact due to deliveries, customer traffic, outdoor cafes, or other activities associated with commercial use. Such impacts would be mitigated through application of the City's development regulations.

Exhibit 3.6-98. Future Activity Units (AU)—Alternative 3

Center[1]	Existing AU/Ac.	Alt. 1 AU/Ac.	Alt. 3 Acres	Alt. 3 AU	Alt. 3 AU/Ac.
Regional Centers[1]					
Downtown	377.4	473.2	952	448,614	471.2
First Hill/Capitol Hill	139.5	163.4	916	149,645	163.3
University Community	54.5	70.2	753	52,773	70.0
South Lake Union	236.7	344.1	340	116,153	341.8
Uptown	131.3	161.3	333	53,696	161.1
Northgate	57.3	75.1	412	30,860	74.9
Hub Urban Centers[1]					
Ballard	67.7	96.9	495	47,906	96.7
Bitter Lake Village	44.0	55.4	364	20,086	55.2
Fremont	71.9	88.1	214	18,883	88.0
Lake City	57.6	75.4	142	10,700	75.2
Mt Baker	36.0	47.4	491	23,196	47.2
West Seattle Junction	70.4	100.2	269	26,927	100.0
Residential Urban Centers[1]					
23rd & Union-Jackson	38.9	46.5	625	29,059	46.5
Admiral	49.2	60.4	98	5,935	60.3
Aurora-Licton Springs	44.1	51.4	327	16,784	51.3
Columbia City	33.9	46.1	335	15,411	46.0
Crown Hill	25.3	31.4	271	8,499	31.4
Eastlake	70.2	82.0	199	16,329	82.0
Green Lake	70.6	87.4	109	9,495	87.3
Greenwood-Phinney Ridge	84.5	101.6	94	9,546	101.3
Madison-Miller	65.3	85.1	145	12,357	85.0
Morgan Junction	34.1	41.6	113	4,706	41.5
North Beacon Hill	28.1	34.5	267	9,175	34.4
Othello	23.7	29.0	499	14,503	29.1
Rainier Beach	23.0	26.0	346	9,007	26.0
Roosevelt	61.4	81.2	170	13,808	81.2
South Park	14.7	18.5	263	4,847	18.4
Upper Queen Anne	89.5	110.5	53	5,806	110.3
Wallingford	42.2	51.5	258	13,258	51.4
Westwood-Highland Park	27.9	32.6	275	8,948	32.5

1 See **Exhibit 2.1-1** in **Chapter 2** for a cross-walk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~A~~lternatives ~~2-5~~.
Note: Activity units (AU) is the sum of residential population and jobs. Assumes an average household size of 2.05 per the King County Growth Management Planning Council. Highlighted hub and residential urban ~~villages~~ centers fall outside King County's countywide center designation criteria of 160–500 acres or below the minimum 18 existing AU or 30 future AU per acre. MIC designation criteria from PSRC does not include an AU density threshold.
Sources: City of Seattle, 2023; BERK, 2023.

Urban Form

Height, Bulk, & Scale

Alternative 3 would allow missing middle housing types such as duplexes, triplexes, fourplexes, sixplexes, and three-story stacked flats in urban neighborhood areas. Seattle is exploring various zoning concepts for middle housing including some focused more on detached and attached housing and others on stacked flats.

While additional housing typologies would be allowed compared to the No Action Alternative, the maximum height allowed for market-rate development in these zones would remain 3-stories for market-rate development. Slight increases in FAR could also allow for slightly bigger buildings and could encourage taller buildings if building taller makes it easier to maximize FAR. See **Exhibit 3.6-99**.

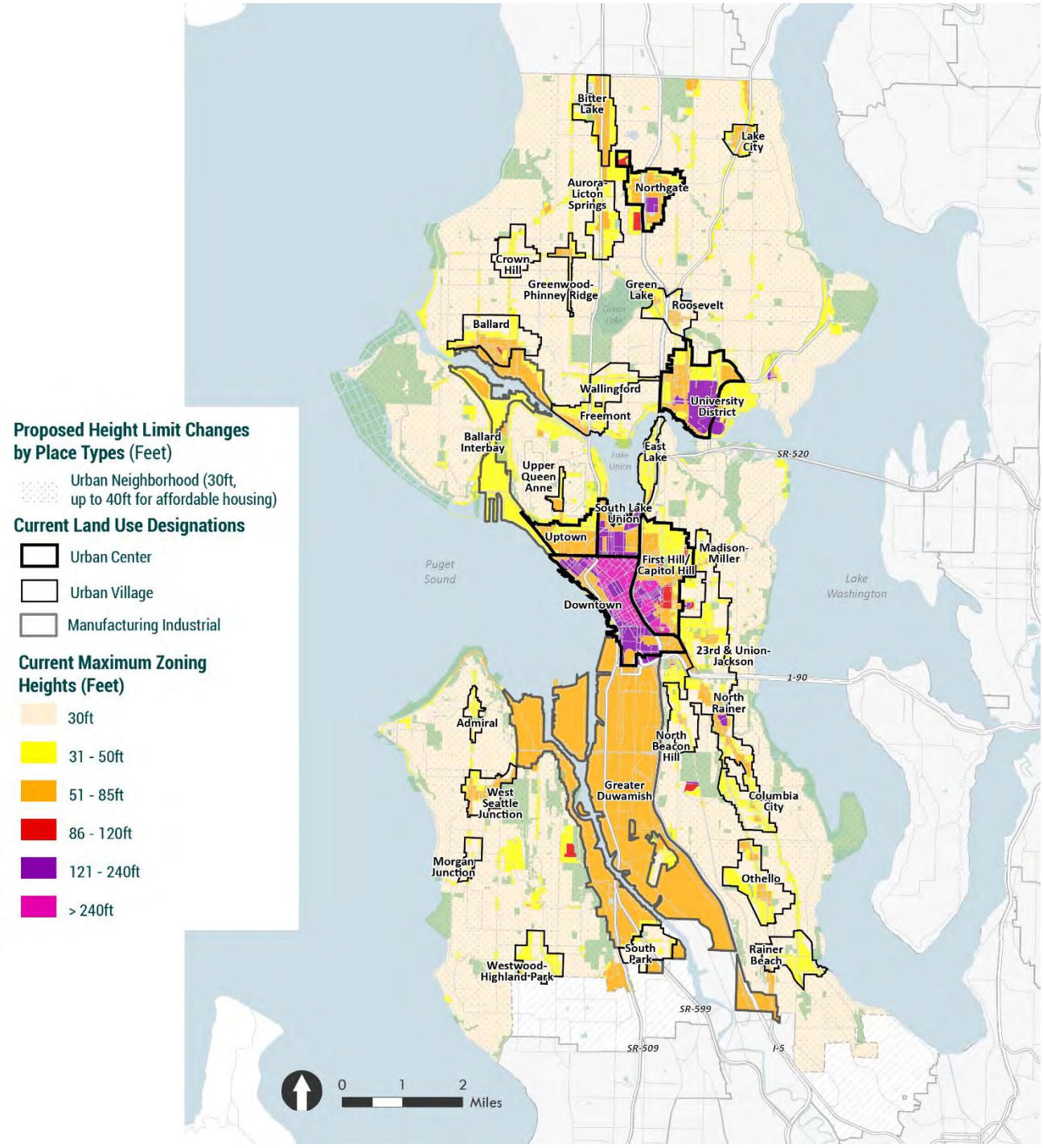
Height, bulk, and scale impacts between buildings on adjacent parcels would be minimal as market-rate development would continue to have a 3-story height limit. However, changes to allow additional housing types could encourage redevelopment in these areas and increase the number of 3-story buildings located next to existing 1- and 2-story buildings. See **Exhibit 3.6-99**.

Alternative 3 would also allow potential height, floor area, or density bonuses for affordable housing projects. This means that some redevelopment may be up to 4 stories, such as 4-story stacked flats.

Middle housing street-level experience. The broad allowances for middle housing proposed in Alternative 3 would change some aspects of how people currently experience neighborhoods, from the street-level/sidewalk experience to how neighbors interact within a development and the larger community. **Exhibit 3.6-100** to **Exhibit 3.6-105** illustrate the types of middle housing expected under a range of concepts. For any middle housing types that would replace existing houses, the increased allowances would likely result in more buildings closer to the street and taller than exist today, which could change the relationship of the building to the sidewalk. When an existing house is preserved and units are added behind it, less change would be experienced from the sidewalk.

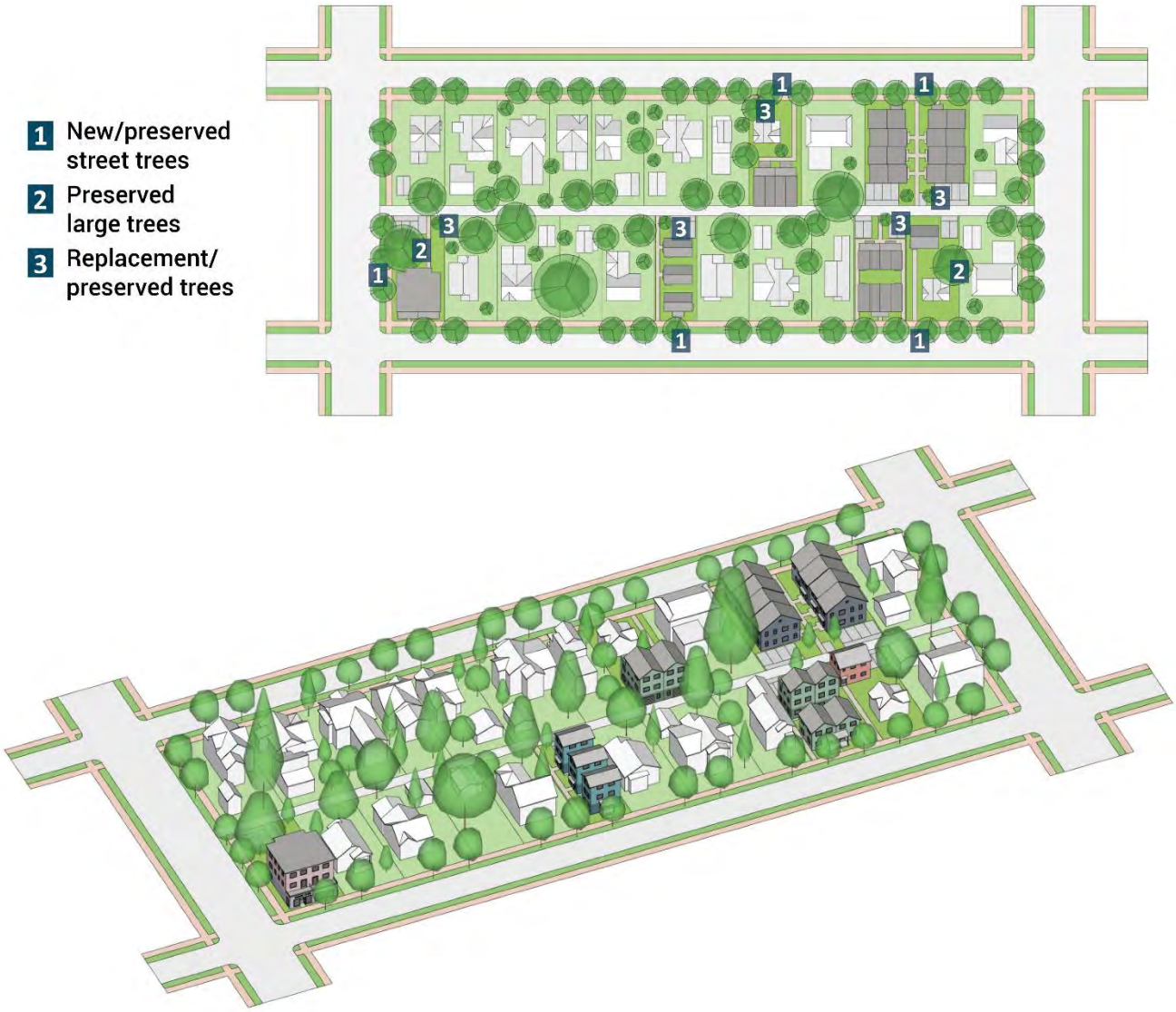
Building-to-street relationship. Existing front setbacks in urban neighborhood areas are generally about 20 feet from the front lot line. The updated Neighborhood Residential zones would require front setbacks of 10 feet. A 10- to 15-foot distance from the sidewalk improves chances for social interactions, providing adequate distance for people to feel comfortable using their front stoop and ground-level rooms facing the street. That distance also keeps upper-story windows and balconies close enough to the street for passive surveillance. Ground-related units with entries facing the street also increase the chances for social interaction at the sidewalk. However, for lots without alleys, an increase in driveways and garages facing the street would reduce these chances (as well as impact general aesthetics). Reduced parking requirements could improve this situation.

Exhibit 3.6-99. Proposed Height Limit Changes—Alternative 3



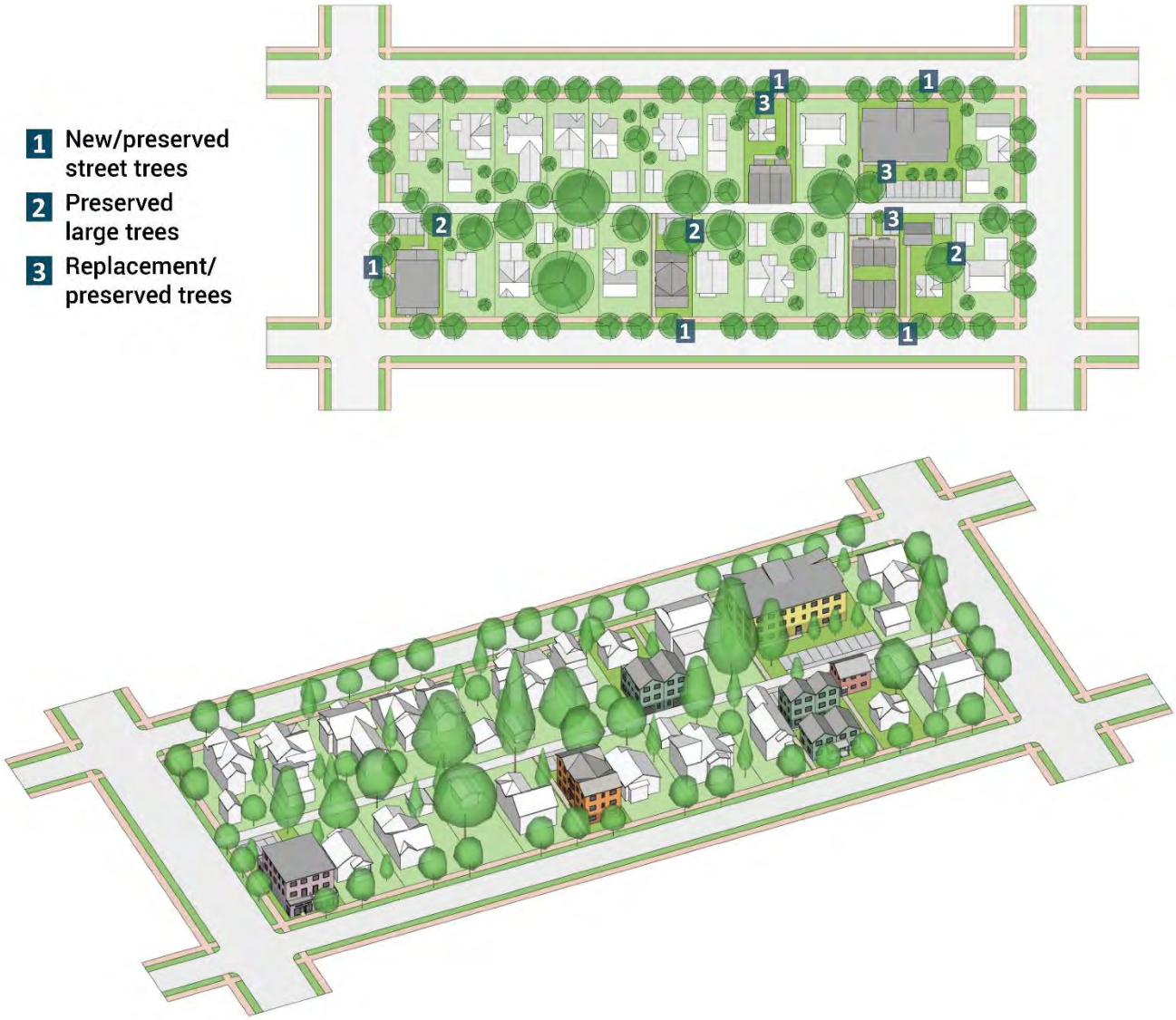
Note: See **Exhibit 2.1-1** in **Chapter 2** for a cross-walk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~A~~lternatives ~~2–5~~.
Source: City of Seattle, 2023; MAKERS, 2023.

Exhibit 3.6-100. Example Neighborhood Residential Block with an Alley Redevelopment—Detached/Attached Units Focus



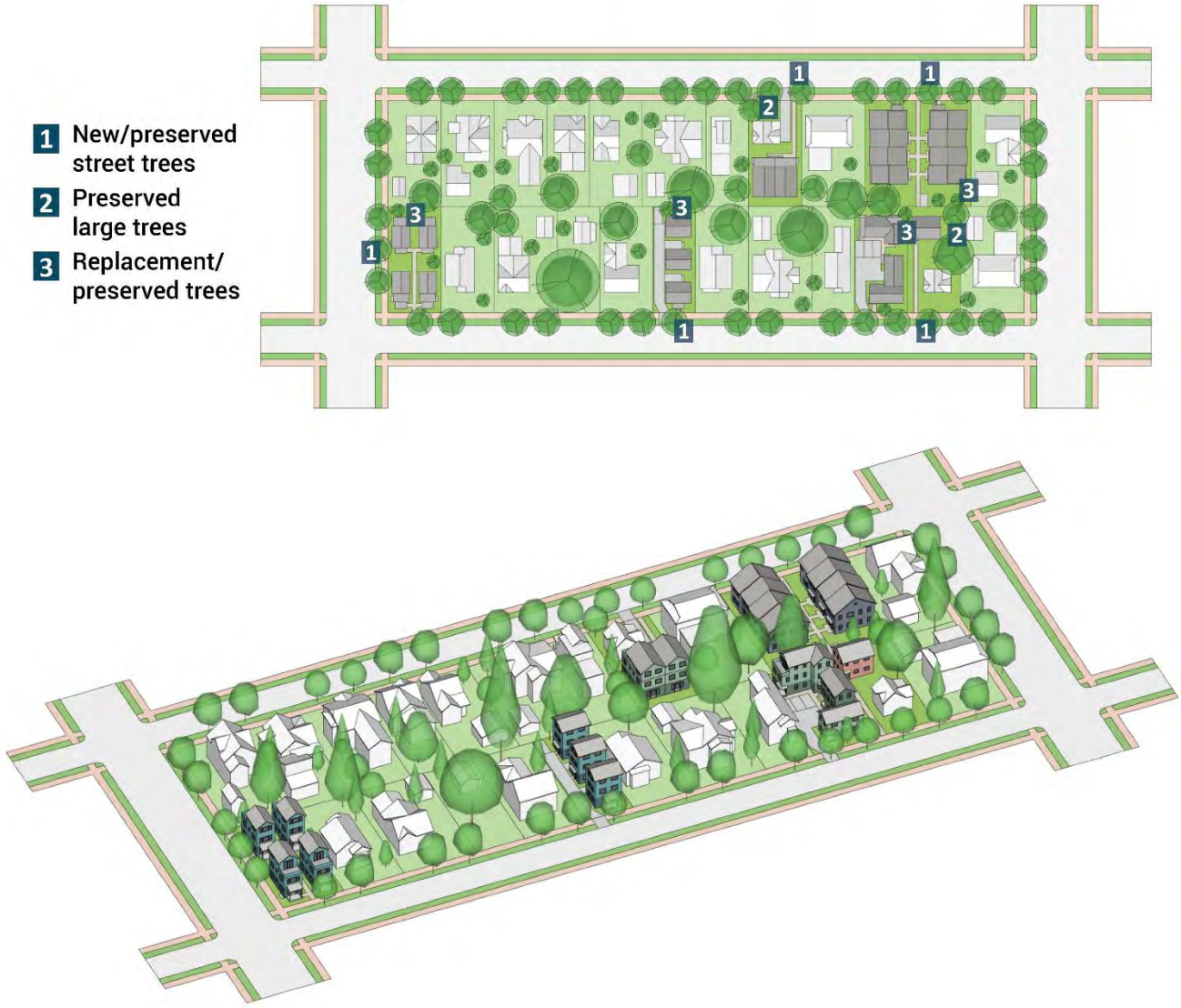
Note: This model illustrates potential redevelopment over the next 20 years with greater allowances for detached unit middle housing types. It is not intended to show exact locations of development but that market-driven, incremental redevelopment over time would occur. This diagram has been updated since the Draft EIS to annotate tree preservation and replacement opportunities.
Source: City of Seattle, 2024~~3~~; MAKERS, 2024~~3~~.

Exhibit 3.6-101. Example Neighborhood Residential Block with an Alley Redevelopment—Stacked Flats Focus



Note: This model illustrates potential redevelopment over the next 20 years with greater allowances for stacked flat middle housing types. It is not intended to show exact locations of development but that market-driven, incremental redevelopment over time would occur. This diagram has been updated since the Draft EIS to annotate tree preservation and replacement opportunities.
Source: City of Seattle, 2024~~3~~; MAKERS, 2024~~3~~.

Exhibit 3.6-102. Example Neighborhood Residential Block without an Alley Redevelopment—Detached/Attached Units Focus



Note: This model illustrates potential redevelopment over the next 20 years with greater allowances for detached unit middle housing types. It is not intended to show exact locations of development but that market-driven, incremental redevelopment over time would occur. This diagram has been updated since the Draft EIS to annotate tree preservation and replacement opportunities.
Source: City of Seattle, 2024~~3~~; MAKERS, 2024~~3~~.

Exhibit 3.6-103. Example Neighborhood Residential Block without an Alley Redevelopment—Stacked Flats Focus

Note: This model illustrates potential redevelopment over the next 20 years with greater allowances for stacked flat middle housing types. It is not intended to show exact locations of development but that market-driven, incremental redevelopment over time would occur. This diagram has been updated since the Draft EIS to annotate tree preservation and replacement opportunities.
Source: City of Seattle, 2024~~3~~; MAKERS, 2024~~3~~.

Exhibit 3.6-104. Example Hilly Neighborhood Residential Block Redevelopment—Detached/Attached Units Focus

Note: This model illustrates potential redevelopment over the next 20 years with greater allowances for detached unit middle housing types. It is not intended to show exact locations of development but that market-driven, incremental redevelopment over time would occur. This diagram has been updated since the Draft EIS to annotate tree preservation and replacement opportunities.
Source: City of Seattle, 2024~~3~~; MAKERS, 2024~~3~~.

Exhibit 3.6-105. Example Hilly Neighborhood Residential Block Redevelopment—Stacked Flats Focus

Note: This model illustrates potential redevelopment over the next 20 years with greater allowances for stacked flat middle housing types. It is not intended to show exact locations of development but that market-driven, incremental redevelopment over time would occur. This diagram has been updated since the Draft EIS to annotate tree preservation and replacement opportunities.
Source: City of Seattle, 2024~~3~~; MAKERS, 2024~~3~~.

Privacy. With more buildings redeveloping up to 3 stories, often stretching further along the side lot lines than existing houses, modest changes to sense of privacy may occur. Because side setbacks would be required, builders would likely include windows along the side lot line, and some balconies may face neighboring properties. Neighbors may feel that more people can look towards their yard or house. This may be mitigated with landscaping and window placement, and impacts would not likely be more significant or adverse than development already allowed in Neighborhood Residential zones.

Usable open space. Greater allowances for the height, bulk, and scale of middle housing buildings in Alternative 3 could impact the amount of usable open space on neighborhood residential lots. For purposes of our analysis, "useable" open space was defined as open space that meets a minimum of 10 feet in both directions or 13 feet in both directions when the open space includes a path leading to multiple units. Existing detached houses often have fairly large rear yards and sometimes large front yards. The usable open space of development prototypes allowed in existing Neighborhood Residential zones that were studied ranged from 21% to 72% of the lot. The useable open space of the middle housing prototypes studied ranged from 22% to 45% of the lot.

The open space configurations vary with some sites having opportunities for shared common outdoor space amongst neighbors and others having smaller outdoor spaces accessible to individual units. In general, attached units and stacked flat types, especially when combined with alley parking and/or low parking ratios, allow for greater contiguous open spaces (as shown in **Exhibit 3.6-101, Exhibit 3.6-103,** and **Exhibit 3.6-105**). These could serve as shared spaces amongst neighbors and provide enough space for a variety of activities, such as children's play and larger group socializing. Detached types generally separate the open space into smaller areas that would provide enough space for activities like barbecues and small group socializing (as shown in **Exhibit 3.6-100, Exhibit 3.6-102,** and **Exhibit 3.6-104**). See **Exhibit 3.6-106** for example open space layouts.

Mixed-use environment. Allowing small commercial uses only on corner lots (as illustrated in **Exhibit 3.6-100** and **Exhibit 3.6-101**) could result in modest visual changes from a residential character to a slightly more mixed-use environment. This change would likely enhance the street level experience with ground floor activities and building design that is more public in nature than private homes, adding visual interest and attractions and allowing for stronger building-to-street relationships.

The following diagrams illustrate likely amounts and types of development over the next 20 years with greater allowances for a range of middle housing types. The models show prototypical Seattle neighborhood blocks (no precise location) that include alleys, no alleys, and steeper terrain (with and without alleys). For each block type, the first model shows concepts focused more on detached units, and the second model shows more detached/attached and stacked flats concepts.

Transitions

Alternative 3 would increase intensity in currently low-intensity neighborhood residential zones but would retain a height gap between neighborhood residential zones and most zoning

in regional and urban centers. In general, transitions under Alternative 3 are likely to be less intense between urban neighborhood areas and regional and urban centers than under the No Action Alternative. Depending on development outcomes, new middle housing may help soften transitions to existing neighborhood commercial zones or in areas with pre-zoning non-conforming uses.

Tree Canopy

The increase in size and number of buildings allowed on a lot in Alternative 3 will likely decrease the amount of space available for trees on neighborhood residential lots. Prototypes that preserve contiguous open space (e.g., stacked flats, small apartments, or attached units) are likely better able to avoid impacts to existing trees and retain more contiguous planting areas for new trees. Detached and semi-attached prototypes tended to have most of their open space in the front, rear, and side setbacks. The narrow (5-foot) side setbacks have limited value for plantings or performing stormwater functions. See **Exhibit 3.6-106**.

Existing trees may also be impacted by construction activities outside of the building and parking area footprints (grading, utility locations, etc.). Prototypes with multiple detached buildings are likely to be more impactful on existing trees due to excavation and foundation construction, multiple utility connections, and other construction impacts.

Impacts to impervious surface coverage is also an important consideration. In the middle housing types studied, we identified the impervious surfaces of structures, surface parking, driveways, outside trash storage areas, and pathways. Of the types studied, the impervious surface area ranged from 47 to 78% percent. In other words, between 22% and 53% of the site remained pervious area to help with water absorption and stormwater runoff. Several prototypes would surpass the existing lot coverage maximum of 35% in Neighborhood Residential zones. Parking areas increased the total impervious surfaces significantly for most prototypes. Requiring new paved surfaces to be permeable, reducing or eliminating parking requirements, and encouraging parking solutions that minimize impervious surface could mitigate some of the additional impervious surface cover change.

Shadows

Height limits do not increase (or only increase modestly with an affordability bonus) under Alternative 3, so shadow impacts would not likely increase significantly over the No Action Alternative. However, greater bulk on more sites may cast shadows on more places.

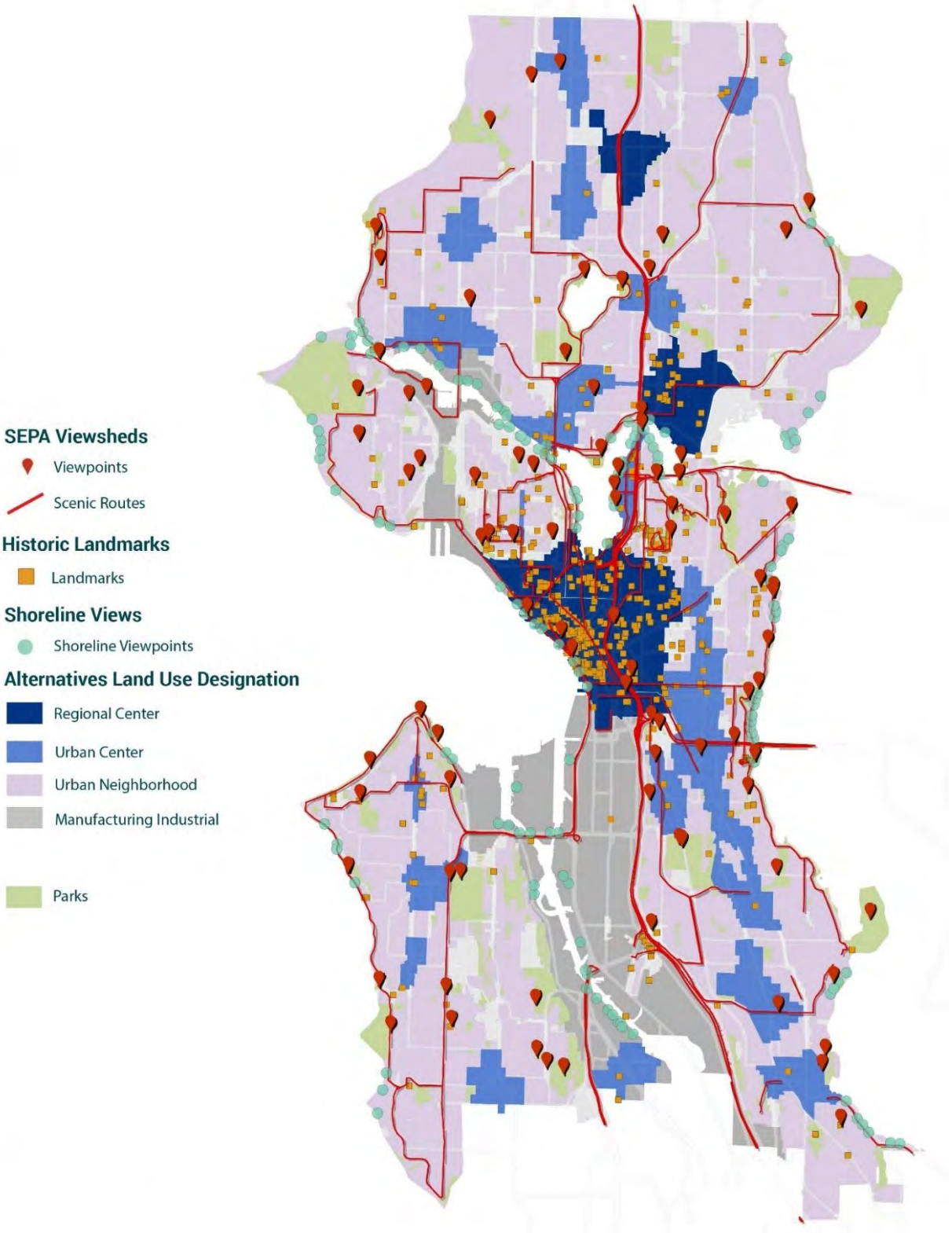
Views

Alternative 3 is unlikely to have impacts on views beyond the No Action Alternative as it would have no height increase for market-rate development and a minimal height increase for affordable housing. The potential for more people to live near the viewpoints may increase awareness and recognition of these public amenities and neighborhood parks. See **Exhibit 3.6-107**.

Exhibit 3.6-106. Relationship of Middle Housing Types and Useable Open Space

Source: MAKERS, 2023.

Exhibit 3.6-107. Seattle Views Map—Alternative 3



Note: See **Exhibit 2.1-1** in **Chapter 2** for a cross-walk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~A~~lternatives ~~2–5~~.
Source: City of Seattle and MAKERS, 2023

Equity & Climate Vulnerability Considerations

Housing Type Variety and Choice

Alternative 3 would allow middle housing types such as duplexes, triplexes, fourplexes, sixplexes, and stacked flats in all Neighborhood Residential zones. The likely increase in housing type variety would provide more options for people to stay in their community over a lifetime and across generations as their needs change. Housing configurations that cluster more units together on a site provide more opportunities for intergenerational families to live near each other. Increasing the amount and types of housing allowed across the city also lets more people live in areas from which they are economically excluded in Alternative 1.

Relationship to Active Transportation

Alternative 3 could slightly increase density throughout the city but could also introduce commercial spaces and corner stores into more areas of the city. Nearby commercial spots provide locations where people can walk and roll for their shopping and leisure needs. Such a change would help mitigate climate impacts and improve chances at social connectedness.

Relationship to Social Wellbeing & Sociability

Alternative 3 could change some aspects of how neighborhoods are currently experienced, from the street level/sidewalk experience as described in Alternative 3's **Height, Bulk, & Scale** section and illustrated in **Exhibit 3.6-100** through **Exhibit 3.6-105**. In general, social interaction opportunities would likely increase.

Although possible future development of middle housing may lead to less open space on lots than under Alternative 1, more units would surround and share the available open space, which would increase opportunities for sociability amongst neighbors. See Alternative 3's **Height, Bulk, & Scale** section.

Climate Change

Most growth under Alternative 3 would continue to be concentrated in existing centers, away from most hazards, with additional growth spread throughout the urban neighborhood place type. Compared to the No Action Alternative and Alternative 2, distributing more growth in urban neighborhoods could increase the potential for populations to be closer to areas susceptible to flooding, sea-level rise, or landslides or affected by interruptions in access to their neighborhoods. Alternative 3 may also decrease pervious area and space for tree planting in neighborhood residential zoned areas, which may have impacts on flooding and urban heat (see **Tree Canopy**). Like the other action alternatives, Alternative 3 would include a new Environment and Climate Element with mitigation and adaptation strategies as well as policies regarding tree canopy protection or enhancement and critical area regulations. See also the discussion under **Impacts Common to All Alternatives**.

Impacts of Alternative 4: Corridor

Land Use Patterns & Compatibility

Alternative 4 would introduce corridors as a new place type that focuses a wider range of housing options and growth near transit and amenities (see **Exhibit 2.4-19**). Corridors are defined as areas within a 10-minute walk from a light rail station and a 5-minute walk from frequent bus transit service and entrances to large parks. Under this definition, corridors include about 50% of areas currently zoned Neighborhood Residential, excluding parks. These areas could allow a wide range of housing types ranging from detached homes to duplexes, triplexes, and fourplexes or 5-story buildings closer to transit and limited 6- and 7-story buildings in or adjacent to areas already zoned multifamily or commercial. Corridors also include some areas already zoned for multi-family and commercial use.

Alternative 4 studies total housing growth of 100,000 housing units (20,000 more than the No Action Alternative) to account for potential additional housing demand that could be met within corridors. As described under **Impacts Common to All Alternatives**, most new growth would be focused within existing centers currently characterized by higher densities and a more diverse mix of uses than other areas of the city. Housing growth within the centers would be the same as the No Action Alternative and Alternatives 2 and 3. Activity levels and activity units per acre would be similar to those described under Alternatives 2 and 3 as a result of the slight jobs shift to corridors (see **Exhibit 3.6-108**). Land use patterns and potential compatibility impacts within the centers would be similar to those described under **Impacts Common to All Alternatives**. Compared to the No Action Alternative, adverse compatibility impacts at the periphery of most centers could be minimized as the abutting corridors redevelop with moderate-scale development (see also the **Transitions** section below).

Under Alternative 4, corridors would accommodate the second highest share of anticipated housing growth behind regional centers (see **Chapter 2**). More than half (57%) of the additional new housing growth in corridors would be directed into areas 1 and 2. However, compared to Alternative 3, this growth would be focused to densify corridors rather than all neighborhood residential zones. Area 2 would receive the greatest overall share of new housing growth under Alternative 4 (21%), followed by Area 4 (19%) and Area 1 (17%). A small number of jobs and commercial space would shift from the larger centers towards corridors to reflect local demand with the distribution of new housing.

Over time, overall land use patterns would become denser within the corridors. This could result in localized land use compatibility impacts within the corridors or on the border with adjacent residential areas where newer development is of greater height and intensity than existing development (see also the **Urban Form** section below). Such impacts would be mitigated through application of the City's development regulations (including shoreline regulations) and design review process where applicable.

Exhibit 3.6-108. Future Activity Units (AU)—Alternative 4

Center	Existing AU/Ac.	Alt. 1 AU/Ac.	Alt. 4 Acres	Alt. 4 AU	Alt. 4 AU/Ac.
Regional Centers[1]					
Downtown	377.4	473.2	952	448,614	471.2
First Hill/Capitol Hill	139.5	163.4	916	149,645	163.3
University Community	54.5	70.2	753	52,773	70.0
South Lake Union	236.7	344.1	340	116,153	341.8
Uptown	131.3	161.3	333	53,696	161.1
Northgate	57.3	75.1	412	30,860	74.9
Hub Urban Centers[1]					
Ballard	67.7	96.9	495	47,906	96.7
Bitter Lake Village	44.0	55.4	364	20,086	55.2
Fremont	71.9	88.1	214	18,883	88.0
Lake City	57.6	75.4	142	10,700	75.2
Mt Baker	36.0	47.4	491	23,196	47.2
West Seattle Junction	70.4	100.2	269	26,927	100.0
Residential Urban Centers[1]					
23rd & Union-Jackson	38.9	46.5	625	29,059	46.5
Admiral	49.2	60.4	98	5,935	60.3
Aurora-Licton Springs	44.1	51.4	327	16,784	51.3
Columbia City	33.9	46.1	335	15,411	46.0
Crown Hill	25.3	31.4	271	8,499	31.4
Eastlake	70.2	82.0	199	16,329	82.0
Green Lake	70.6	87.4	109	9,495	87.3
Greenwood-Phinney Ridge	84.5	101.6	94	9,546	101.3
Madison-Miller	65.3	85.1	145	12,357	85.0
Morgan Junction	34.1	41.6	113	4,706	41.5
North Beacon Hill	28.1	34.5	267	9,175	34.4
Othello	23.7	29.0	499	14,503	29.1
Rainier Beach	23.0	26.0	346	9,007	26.0
Roosevelt	61.4	81.2	170	13,808	81.2
South Park	14.7	18.5	263	4,847	18.4
Upper Queen Anne	89.5	110.5	53	5,806	110.3
Wallingford	42.2	51.5	258	13,258	51.4
Westwood-Highland Park	27.9	32.6	275	8,948	32.5

1 See **Exhibit 2.1-1** in **Chapter 2** for a cross-walk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~A~~lternatives ~~2-5~~.
Note: Activity units (AU) is the sum of residential population and jobs. Assumes an average household size of 2.05 per the King County Growth Management Planning Council. Highlighted hub and residential urban ~~villages~~ centers fall outside King County's countywide center designation criteria of 160–500 acres or below the minimum 18 existing AU or 30 future AU per acre. MIC designation criteria from PSRC does not include an AU density threshold.
Sources: City of Seattle, 2023; BERK, 2023.

Urban Form

Height, Bulk, & Scale

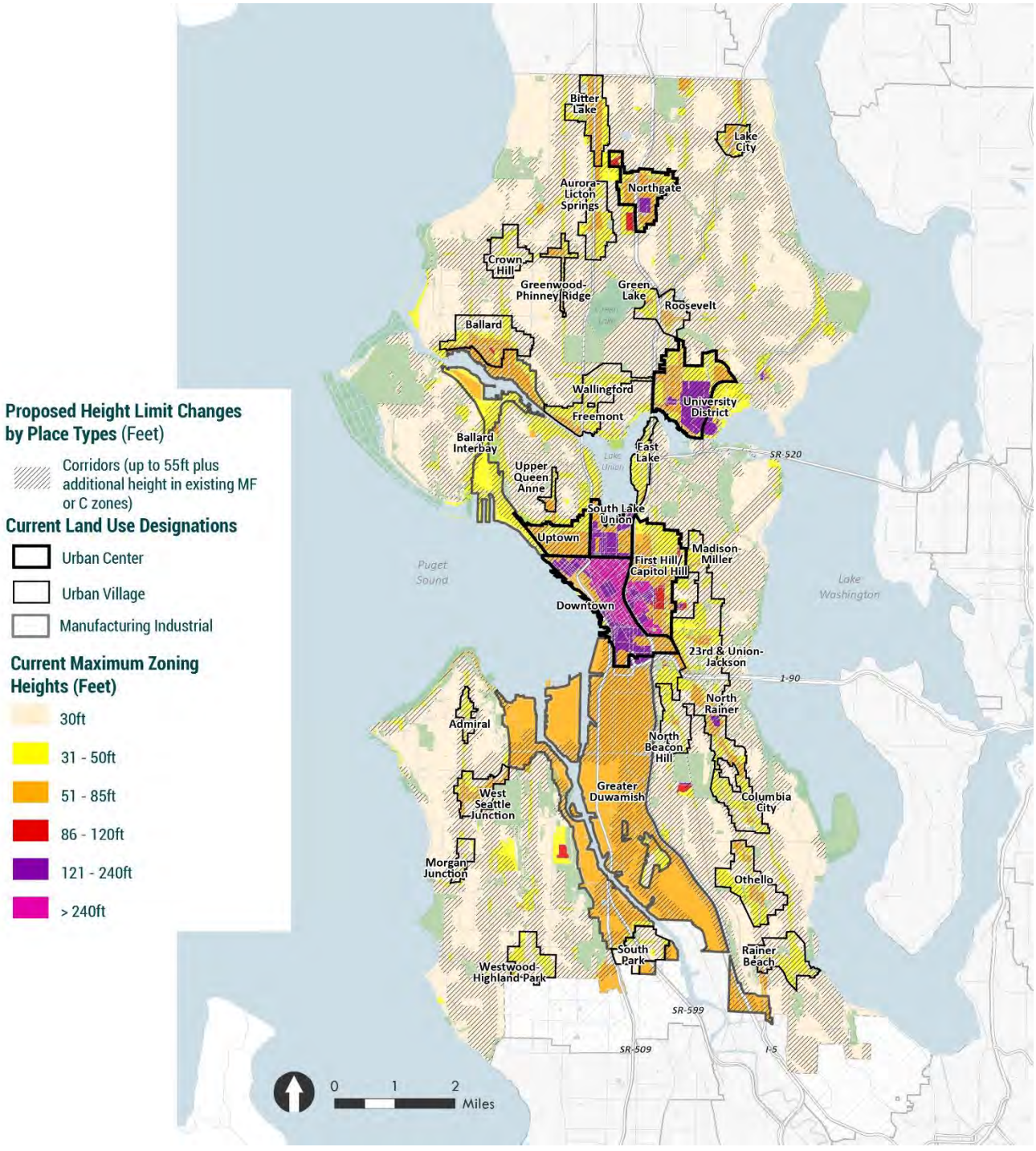
Corridors could contain a mix of residential and mixed-use development from duplex, triplex, and fourplexes to 5-story apartments and mixed-use buildings. Corridors also include some areas already zoned for multi-family and commercial development where height limits could be up to 6- or 7-stories. See **Exhibit 3.6-109**. Over time, overall building height and bulk in the new corridor areas would likely increase with new development. Similar to Alternative 2, urban neighborhood areas that are currently primarily 1- and 2-story buildings would be allowed to develop up to 4- to 5-story buildings. The scale of the area where changes in height and bulk would be allowed is similar to Alternative 3, as about 50% of urban neighborhood area would become a corridor place type. Localized impacts could occur as the areas transition to a more intense development pattern. However, future development in corridors adjacent to regional and urban centers would likely be more similar to current development happening in those areas and register as less stark impacts.

Alternative 4 could also result in height, bulk, and scale impact between properties in corridors where areas that are predominately 1- and 2-story detached homes might experience gradual redevelopment with multifamily homes of 4- and 5-stories on a site-by-site basis. Differences in massing on adjacent properties could be especially larger on sites with existing multifamily and commercial zones where new development could be as high as 7-stories. These transitions between parcels are not likely to be significantly more intense than those already occurring in many regional and urban centers but would occur in new areas.

Like Alternatives 2 and 3, Alternative 4 would introduce a new type of infill area (corridors) on the low end, potentially reducing contrast between regional and urban centers and other areas. Corridor areas already differ from most parts of low-intensity neighborhoods in terms of traffic, noise, impervious surfaces, and in many cases building scale. As a result, Alternative 4 would likely heighten contrasts between corridor areas and adjacent lower intensity areas, especially in parts of the city where few transit corridors are present, like West Seattle. In areas where a high number of transit corridors are already present—like the Central District and Ravenna—the overall effect may be to create smoother transitions because overlapping corridors will create continuous areas of zoning at the scale of 4-6 stories.

Alternative 4 could also lessen transitions along arterial streets where Neighborhood Commercial zoning occupies a half-block along the arterial and Neighborhood Residential zoning exists on the other half of the block. New zoning under this alternative could result in a more gradual transition from Neighborhood Commercial zoning to lower-density areas.

Exhibit 3.6-109. Proposed Height Limit Changes—Alternative 4



Source: City of Seattle and MAKERS, 2023

Transitions

Tree Canopy

With more widespread redevelopment than No Action, private property may see a greater loss of existing tree canopy than No Action. At the same time, street frontage improvements with redevelopment would likely include street tree plantings.

Shadows

Height limits would increase from 30 feet to 55 feet in the corridor areas under Alternative 4. Height limits in areas currently zoned multifamily or commercial could increase to a higher overall height, although the change may be less since these areas are generally zoned for higher heights today. Because corridors cover large swaths of the city, shadow impacts would be widespread.

Shadows on Public Parks

Corridor areas are found on the south, west, and east sides (the sides most impactful to casting long-lasting shadows on the park) of nearly every park in Seattle under Alternative 4. Most parks would likely see increased shadows.

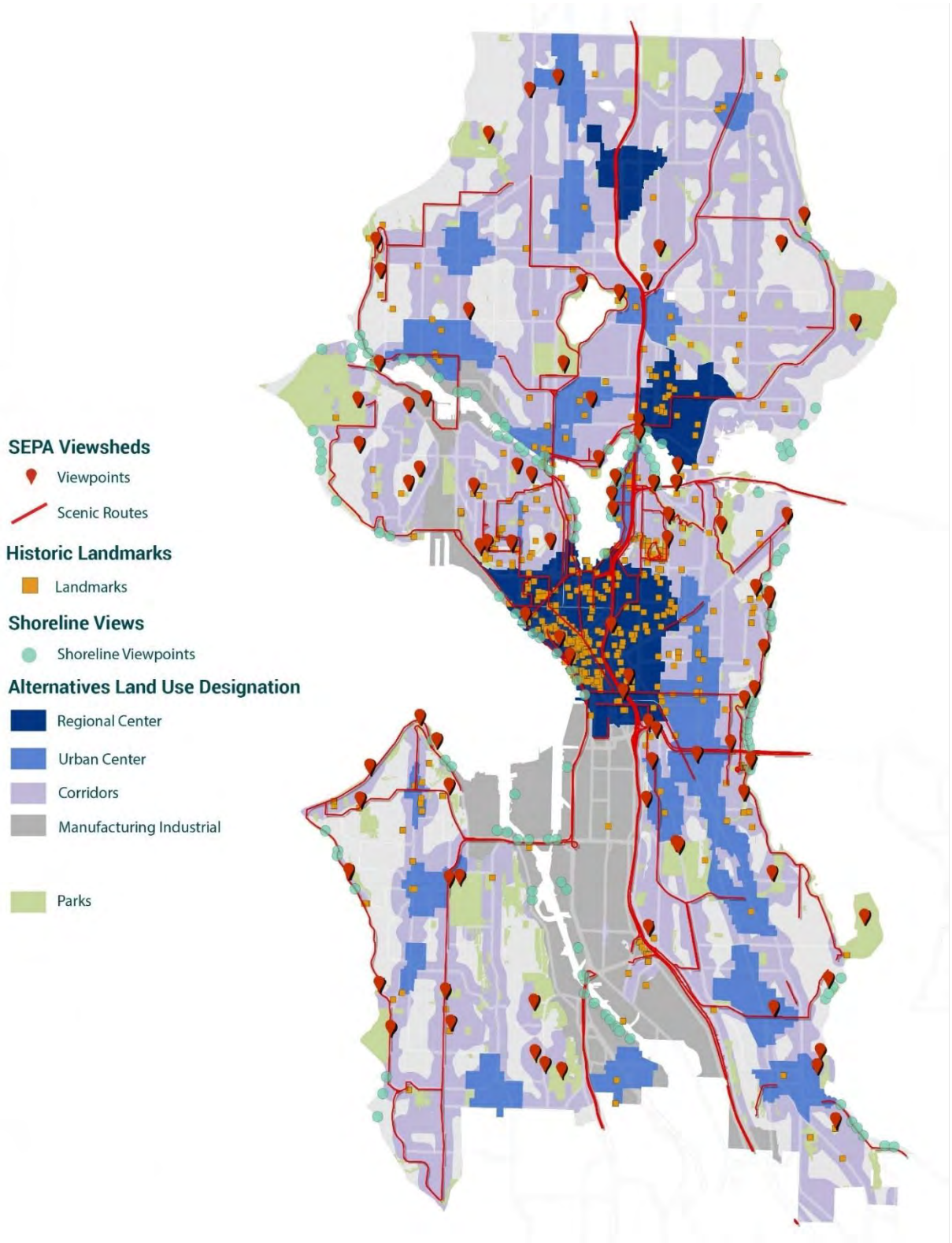
Shadows on Public Rights-of-Way

Taller buildings would likely develop in more areas in Seattle under Alternative 4, increasing the streets that would experience more time in shade. Shadows would particularly impact east-west streets (especially when development is on the south side) and the north faces of hills, with lesser impacts throughout.

Views

Most of the protected viewpoints and scenic routes are within or adjacent to the more intense development expected in the corridor place type. Thus, Alternative 4, with height increases from 30 feet to 45-55 feet may impact protected views. Only limited viewpoints will have minor degrees of potential future view disruptions. The low-impacted sites depend upon specific locational qualities such as along rights-of-way, near bodies of water, and at naturally high elevations. See **Exhibit 3.6-110**.

Exhibit 3.6-110. Seattle Views Map—Alternative 4



Note: See **Exhibit 2.1-1** in **Chapter 2** for a cross-walk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~A~~lternatives ~~2–5~~.
Source: City of Seattle, 2023; MAKERS, 2023.

Equity & Climate Vulnerability Considerations

Housing Type Variety and Choice

Alternative 4 offers a wider range of housing types ranging from detached homes, middle housing (e.g., duplexes, fourplexes, etc.), and 5-story buildings close to transit and parks. The likely increase in housing type variety would provide more options for people to stay in their community over a lifetime and across generations as their needs change. Increasing housing type options across half of neighborhood residential zones in the city also increases the opportunities for people to live in parts of the city economically closed off to them in Alternative 1.

Relationship to Active Transportation

Alternative 4 could moderately increase density near transit and large parks. Nearby parks provide locations where people can walk and roll for their play and leisure needs. More people living within a 10-minute walk from light rail and a 5-minute walk from frequent bus transit likely increases the number of people walking, rolling, and using transit. Such a change would help mitigate climate impacts and improve chances at social connectedness.

Relationship to Social Wellbeing & Sociability

More housing within a 5-minute walk to large parks under Alternative 4 would likely increase opportunities for social interactions and social wellbeing. At the same time, the number of people living along inhospitable arterials, where social interactions can be inhibited by traffic's impact on sense of safety, air quality, and noise would likely increase.

Climate Change

Growth under Alternative 4 would be concentrated in existing centers and in corridors away from most hazards. More people living within a 10-minute walk from light rail and a 5-minute walk from frequent bus transit likely increases the number of people walking, rolling, and using transit. Such a change would help mitigate climate impacts. Like the other action alternatives, Alternative 4 would include a new Environment and Climate Element with mitigation and adaptation strategies as well as policies regarding tree canopy protection or enhancement and critical area regulations. Also see Alternative 4's **Tree Canopy** section for potential tree-related impacts, which could impact urban heat and flooding, and the discussion under **Impacts Common to All Alternatives**.

Impacts of Alternative 5: Combined

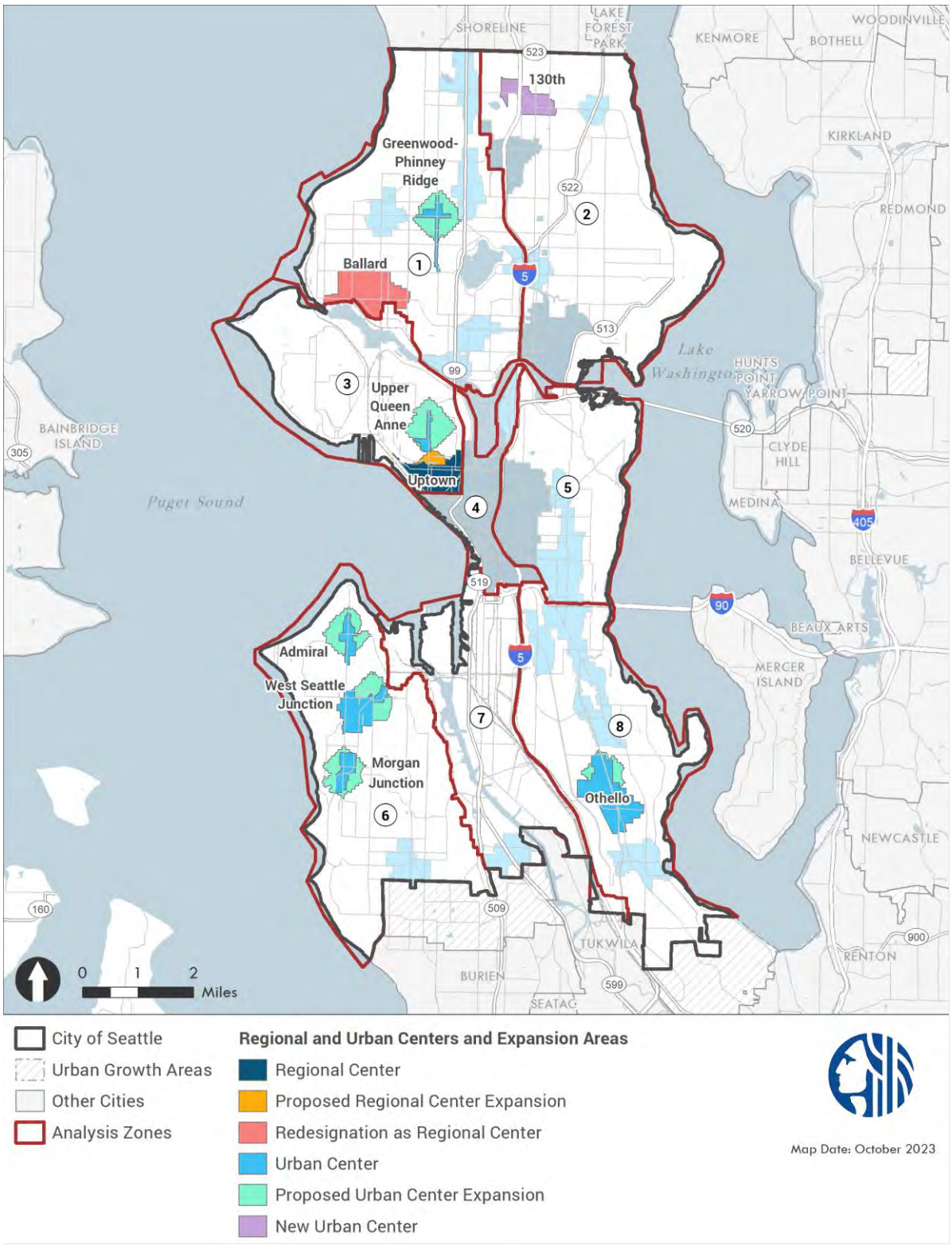
Land Use Patterns & Compatibility

Alternative 5 anticipates the largest increase in supply and diversity of housing across Seattle. It includes the strategies for encouraging housing growth in Alternatives 2, 3, and 4 plus some additional changes to existing center boundaries and changes to place type designations (see **Exhibit 2.4-22**). Alternative 5 also expands the boundaries of seven centers (the Uptown Regional Center~~,~~ and West Seattle Junction, Admiral, Greenwood-Phinney Ridge, Morgan Junction, Othello, and Upper Queen Anne urban centers), designates the NE 130th Street Station Area as a new urban center, and re-designates Ballard as a regional center (see **Exhibit 3.6-111**).

Alternative 5 studies total housing growth of 120,000 housing units (40,000 more than the No Action Alternative and 20,000 more than Alternatives 2, 3, or 4) to account for potential additional housing demand that could be met within the areas of change. As described under **Impacts Common to All Alternatives**, most new growth would still be focused within the centers currently characterized by higher densities, more compact building forms, and a more diverse mix of uses than other areas of the city. Housing growth within the centers under Alternative 5~~, however,~~ would be similar to Alternative 4 (higher than the No Action Alternative or Alternative 3)~~under Alternative 5 than the other alternatives~~. Residential urban centers would accommodate the second highest share of anticipated housing growth behind regional centers (see **Chapter 2**).

Land use patterns and potential compatibility impacts within most of the centers would be similar to those described under **Impacts Common to All Alternatives**. The ~~six~~ seven expanded center boundaries consist primarily of single-family residential areas neighboring mixed-use and commercial development nodes within the existing center boundaries. Over time, these areas would gradually convert to denser multifamily residential and mixed-use patterns of development. The Uptown Regional Center expansion area primarily consists of existing multifamily development—as a result, future land use patterns would likely be similar in scale and intensity to the No Action Alternative even if the area redevelops with more mixed use. Adverse compatibility impacts at the periphery of most centers would be minimized ~~the most~~ under Alternative 5 more than Alternatives 1 through 4 as the abutting neighborhood center, corridor~~s~~, and urban neighborhood areas redevelop (see also the **Transitions** section below).

Exhibit 3.6-111. Expanded, Redesignated, and New Regional and Urban Centers—Alternative 5



Note: See **Exhibit 2.1-1** in **Chapter 2** for a crosswalk of existing place types (existing and Alternative 1) versus proposed place type names under the other ~~a~~Alternatives ~~2–5~~.
Source: City of Seattle, 2023; BERK, 2023.

Activity levels and activity units per acre would vary from the other alternatives as a result of the increased overall growth and change in center boundaries. Under Alternative 5, the redesignated Ballard Regional Center would meet PSRC's ~~Metro~~ Urban Regional Growth Center size and activity unit density criteria. Unlike the ~~other a~~Alternatives 1 through 4, Othello, Rainier Beach, and South Park would also meet King County's minimum density criteria for Countywide Centers. However, Admiral, Morgan Junction, and Upper Queen Anne would fall below planned density criteria and Othello would be above the size threshold as a result of their increased size. 23rd & Union-Jackson, Green Lake, Lake City, and Madison-Miller would also still be outside the size threshold. See **Exhibit 3.6-112**.

PSRC ~~Metro~~ RGCs require a minimum density of 30 existing activity units and 85 planned activity units for Metro RGCs, 18 existing activity units and 45 planned activity units for Urban RGCs, and are expected to be between 320–640 acres in size (or larger if served by an internal, high-capacity transit system). Appendix 6 of the King County CPPs includes higher activity unit thresholds for Metro and Urban RGCs (60 existing/120 planned for Metro RGCs and 30 existing/60 planned for Urban RGCs). Per the CPPs, not meeting existing activity unit thresholds for existing centers (all of Seattle's Regional Centers except for Ballard under the Preferred Alternative) is not grounds for de-designation or re-designation by the Growth Management Planning Council.

King County countywide centers require an existing density of at least 18 activity units and planned density of at least 30 activity units and are expected to be between 160–500 acres in size.

See also **Section 3.7 Relationship to Plans, Policies, & Regulations**.

Under Alternative 5, neighborhood centers would accommodate the third highest share of anticipated housing growth behind regional centers and urban centers (see **Chapter 2**). Like Alternative 2, about half (49%) of housing growth in neighborhood centers would be directed into those with low displacement risk in areas 1 and 2 and about 11% would be directed into neighborhood centers with high displacement risk (notably in Area 6). Housing growth in the corridors and urban neighborhood areas would be focused in Area 2 followed by Areas 8, 6, and 1. Land use patterns and potential adverse compatibility impacts within the new place types would be similar to those described under Alternatives 2, 3, and 4 and the Preferred Alternative.

Overall, Alternative 5 distributes more growth to a greater number of locations than any other alternative. This is likely to result in a denser land use pattern citywide with focused growth in the centers and smaller mixed-use nodes in the new neighborhood centers and along corridors with frequent transit. Impacts would be mitigated through application of the City's development regulations (including shoreline regulations) and design review process.

Exhibit 3.6-112. Future Activity Units (AU)—Alternative 5

Center	Existing AU/Ac.	Alt. 1 AU/Ac.	Alt. 5 Acres	Alt. 5 AU	Alt. 5 AU/Ac.
Regional Centers[1]					
Downtown	377.4	473.2	952	447,351	469.9
First Hill/Capitol Hill	139.5	163.4	916	149,578	163.3
University Community	54.5	70.2	753	52,695	69.9
South Lake Union	236.7	344.1	340	115,612	340.2
Uptown[2]	131.3	161.3	391	53,723	137.2
Northgate	57.3	75.1	412	30,803	74.7
Ballard[2]	67.7	96.9	495	50,047	101.0
Hub Urban Centers[1]					
Bitter Lake Village	44.0	55.4	364	20,044	55.1
Fremont	71.9	88.1	214	18,877	88.0
Lake City	57.6	75.4	142	10,688	75.1
Mt Baker	36.0	47.4	491	23,135	47.1
West Seattle Junction[2]	70.4	100.2	449	26,934	59.9
Residential Urban Centers[1]					
130th Street[2]	18.4	20.7	218	7,733	35.5
23rd & Union-Jackson	38.9	46.5	625	29,046	46.5
Admiral[2]	49.2	60.4	288	6,886	23.9
Aurora-Licton Springs	44.1	51.4	327	16,775	51.3
Columbia City	33.9	46.1	335	15,390	46.0
Crown Hill	25.3	31.4	271	8,492	31.3
Eastlake	70.2	82.0	199	16,323	81.9
Green Lake	70.6	87.4	109	9,492	87.3
Greenwood-Phinney Ridge[2]	84.5	101.6	315	9,579	30.4
Madison-Miller	65.3	85.1	145	12,349	85.0
Morgan Junction[2]	34.1	41.6	281	7,169	25.5
North Beacon Hill	28.1	34.5	267	9,161	34.3
Othello[2]	23.7	29.0	584	17,894	30.6
Rainier Beach	23.0	26.0	346	12,893	37.3
Roosevelt	61.4	81.2	170	13,801	81.1
South Park	14.7	18.5	263	7,951	30.2
Upper Queen Anne[2]	89.5	110.5	329	5,857	17.8
Wallingford	42.2	51.5	258	13,248	51.4
Westwood-Highland Park	27.9	32.6	275	9,386	34.1

1 See **Exhibit 2.1-1** in **Chapter 2** for a cross-walk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~A~~lternatives ~~2-5~~.
2 Proposed new center, redesignated center, or boundary expansion.
Note: Activity units (AU) is the sum of residential population and jobs. Assumes an average household size of 2.05 per the King County Growth Management Planning Council. Highlighted hub and residential urban ~~villages~~ centers fall outside King County's countywide center designation criteria of 160–500 acres or below the minimum 18 existing AU or 30 future AU per acre. MIC designation criteria from PSRC does not include an AU density threshold.
Sources: City of Seattle, 2023; BERK, 2023.

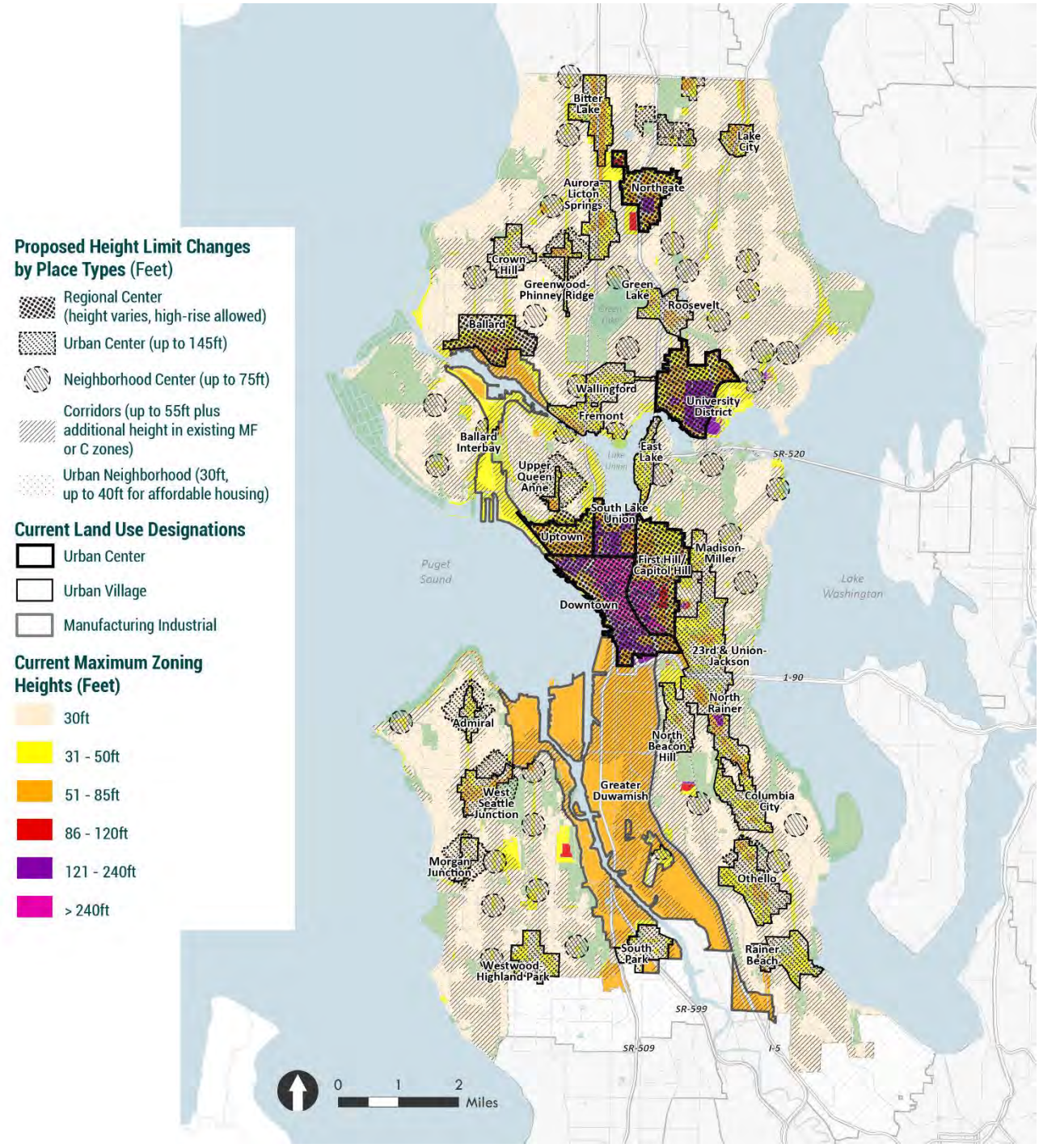
Urban Form

Height, Bulk, & Scale

Alternative 5 is a combination of Alternatives 2, 3, and 4, meaning no residential area in the city would be zoned exclusively for detached housing. Over time, overall building height and bulk in the city would likely increase with new development under Alternative 5 (see **Exhibit 3.6-113**). Under its new designation as a regional center, Ballard could be considered for heights above the current maximum of eight stories as part of future planning work since the Comprehensive Plan designates regional centers as appropriate for high-rise development. Expanded urban centers—such as the three in West Seattle, Greenwood-Phinney Ridge, Othello, and Upper Queen Anne—would allow higher development in areas that are currently zoned neighborhood residential with existing buildings that are predominately 1- and 2-story. Under Alternative 5, localized conflicts could occur as areas transition to a more intense development pattern. However, unlike other alternatives, the changes in height, bulk, and scale under Alternative 5 would occur over a larger area. Consequently, localized impacts may be more distributed throughout the city.

Alternative 5 could also result in height, bulk, and scale impacts between properties in neighborhood centers, corridors, and expanded regional and urban centers where areas that are predominately 1- and 2-story detached homes might experience gradual redevelopment with larger multifamily homes on a site-by-site basis. Differences in massing could be especially larger where affordable housing projects use potential height and floor area bonuses. Differences in massing on adjacent properties are not likely to be significantly more intense than those already occurring in many regional and urban centers, but the area in which they might occur would be the largest among the alternatives.

Exhibit 3.6-113. Proposed Height Limit Changes—Alternative 5



Note: See **Exhibit 2.1-1** in **Chapter 2** for a cross-walk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~A~~lternatives ~~2-5~~.
Sources: City of Seattle, 2023; MAKERS, 2023.

Transitions

The addition of two new types of infill areas (neighborhood centers and corridors) as well as middle housing in urban neighborhood areas will overall create smoother and more varied transitions in intensity throughout the city. As development occurs piecemeal, stark contrasts in building scale may appear, but over time feathered gradations of intensity will fill in around corridors, nodes of activity, neighborhood amenities, and urban villages.

Tree Canopy

With the most redevelopment potential, losses to existing tree canopy on private property could be greatest under Alternative 5. However, required frontage improvements may increase street tree plantings.

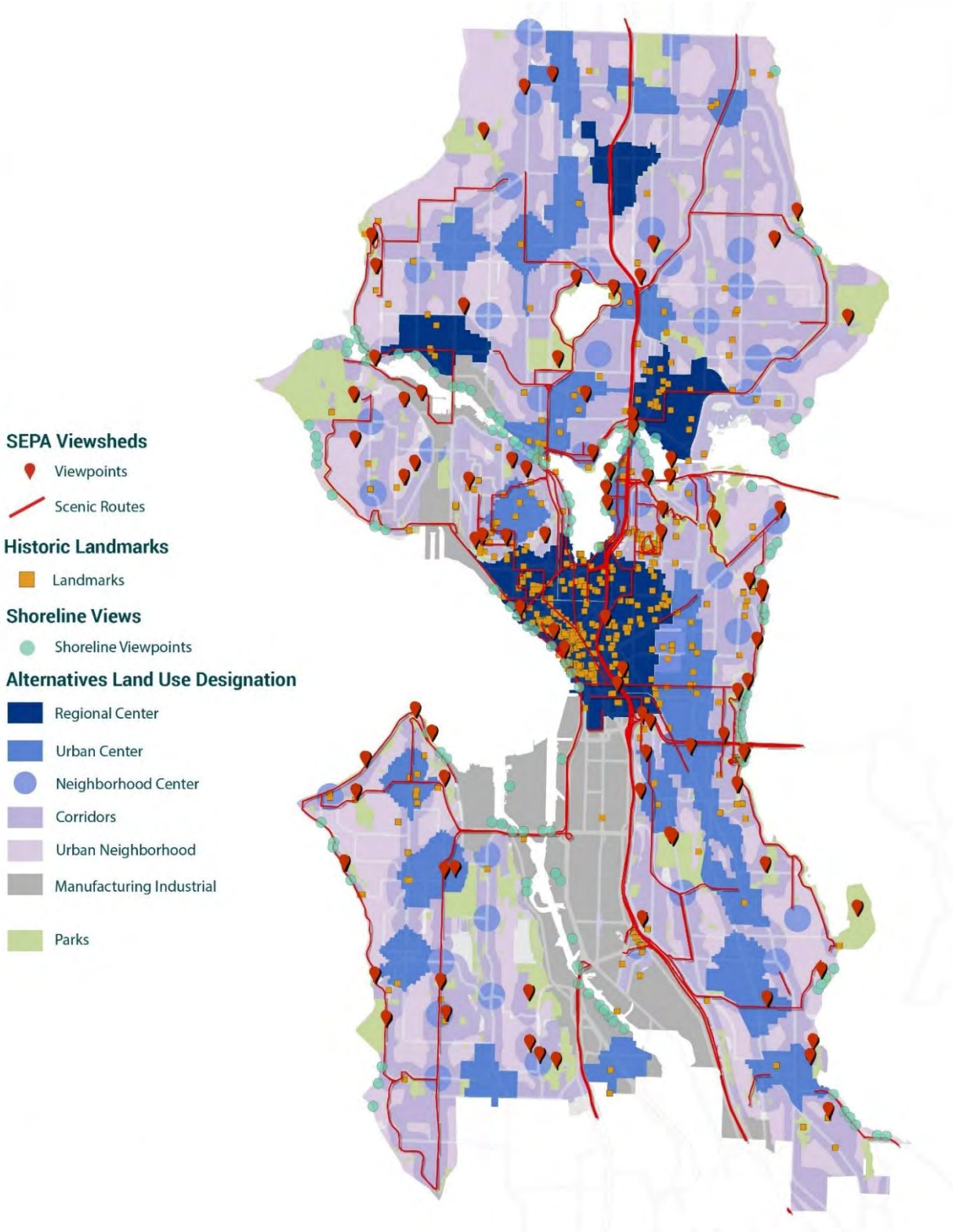
Shadows

Shadow impacts under Alternative 5 would include all the impacts discussed under the other alternatives. In addition, expanded regional and urban center boundaries under Alternative 5 would increase areas with potential shadows on public rights-of-way and parks.

Views

Impacts to views under Alternative 5 would be similar to those described under Alternative 4, with additional effects on scenic and landmark view sites captured in potential expansion and designation of regional and urban centers, such as the proposed extension of three urban centers in West Seattle and newly defined Ballard Regional Center. Allowing additional height for affordable housing development citywide could also create additional view impacts but would be limited by the number of affordable housing projects that are expected to be developed. Adverse impacts to Seattle's view corridors would likely occur under Alternative 5 due to substantial increased growth and development citywide. See **Exhibit 3.6-114**.

Exhibit 3.6-114. Seattle Views Map—Alternative 5



Note: See **Exhibit 2.1-1** in **Chapter 2** for a cross-walk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~A~~lternatives ~~2–5~~.
Source: City of Seattle, 2023; MAKERS, 2023.

130th/145th Station Area

Land Use Patterns & Compatibility

Under Alternative 5, a new urban center would be designated on both the west and east sides of I-5 at the Sound Transit light rail station, with zoning including Low-rise Residential, Midrise Multifamily, and Neighborhood Commercial (2 and 3). This area would include an existing commercial node around Pinehurst and an expanded residential mixed-use area closer to the station. Housing and job growth in the new 130th Street ~~Residential~~ Urban ~~Village~~ Center would be greatest under Alternative 5, with more growth clustered in the newly designated urban ~~village~~center.

Growth in the 145th Station Area would be similar to Alternative 2. Buildings would be denser than Alternative 2 with more mixed-use buildings and a wider variety of housing types allowed.

Over time, the station areas would likely redevelop into mixed-use nodes with a greater intensity of development than any of the other alternatives. Growth would increase activity unit density from 18.6 (existing) to 35.9 around NE 130th Street and from 35.7 (existing) to 79.4 around 15th and 145th. This increased density would represent a potential adverse land use impact of future growth in the station areas under Alternative 5. Such impacts would be mitigated through application of the City's development regulations and design review process. In addition, increased density citywide would lessen potential adverse compatibility impacts on the periphery of all new urban centers and neighborhood centers, including the station areas (see also the **Transitions** section below).

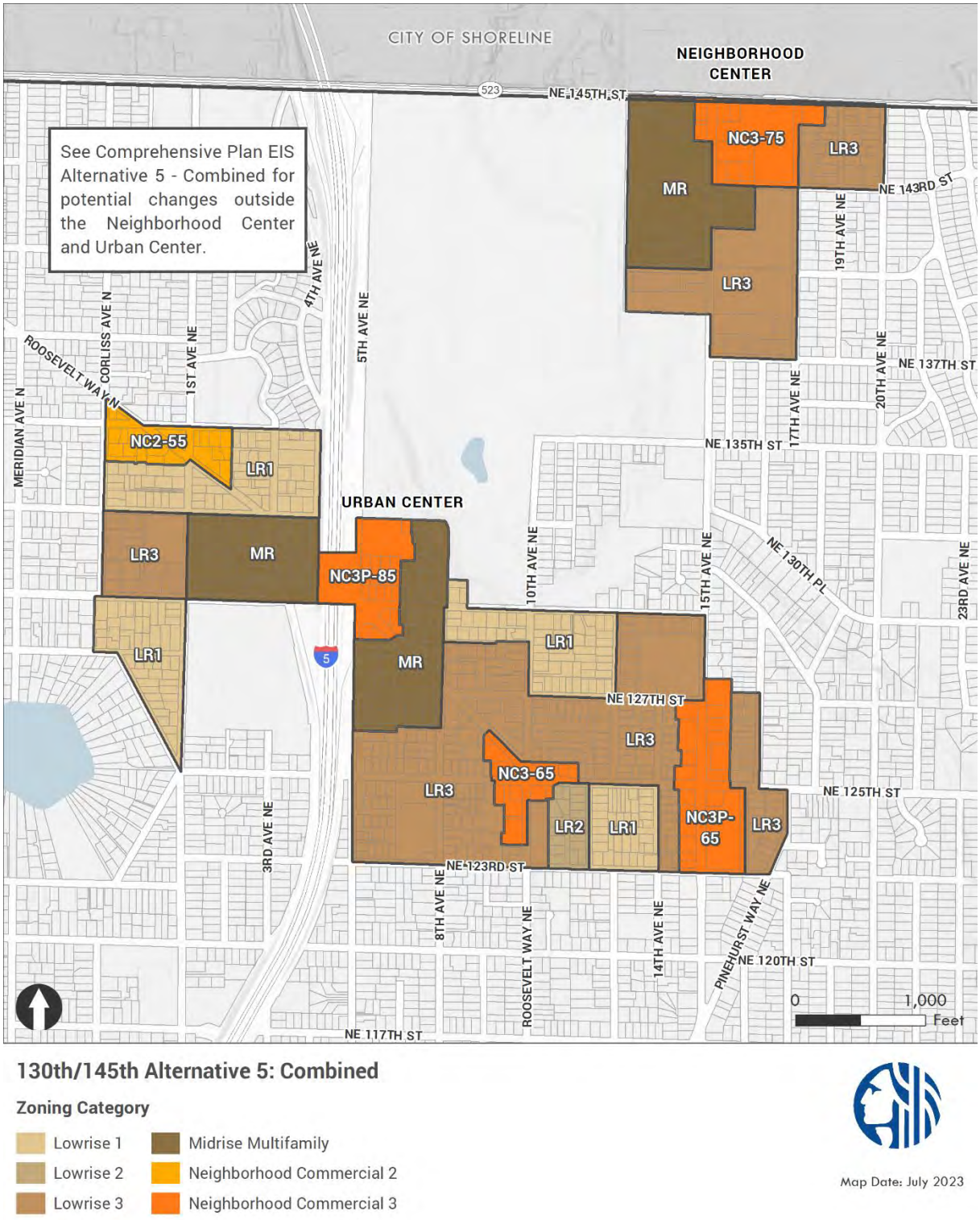
See **Exhibit 3.6-115** and **Exhibit 3.6-116**.

Exhibit 3.6-115. Station Area Share of Targets, 2024-2044—Alternative 5

Location	Place Type	Acres	New Housing Units	New Jobs	Existing AU/Ac.	Future AU/Ac.
NE 130th Street	Urban Center	218	1,644	356	18.4	35.5
15th & 145th	Neighborhood Center—Low Risk*	65	1,059	648	35.3	78.5

Note: The 130th Street and Pinehurst Neighborhood Centers from Alternative 2 are both part of the 130th Street Urban Center in Alternative 5. See **Exhibit 2.1-1** in **Chapter 2** for a cross-walk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~A~~lternatives ~~2-5~~.
*Risk of displacement.
Source: City of Seattle, 2023; BERK, 2023.

Exhibit 3.6-116. 130th/145th Station Area Zoning Concepts—Alternative 5: Combined



Note: See **Exhibit 2.1-1** in **Chapter 2** for a cross-walk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~A~~lternatives ~~2–5~~.
Sources: City of Seattle, 2022: BERK, 2022.

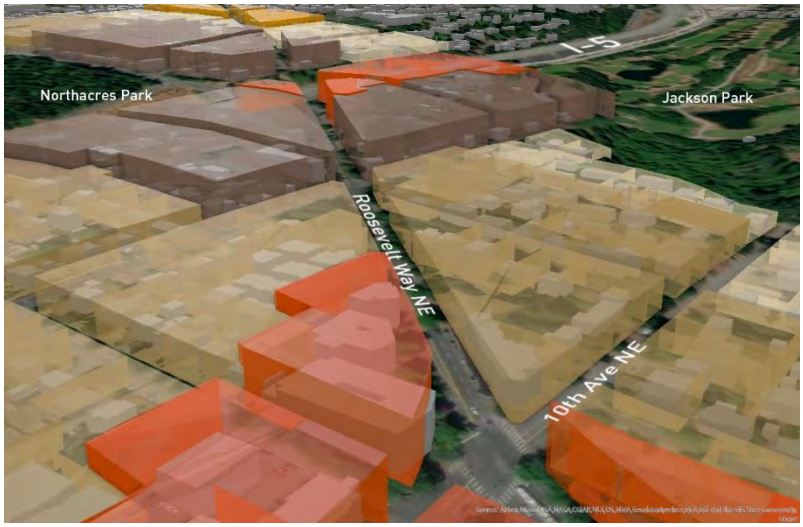
Urban Form

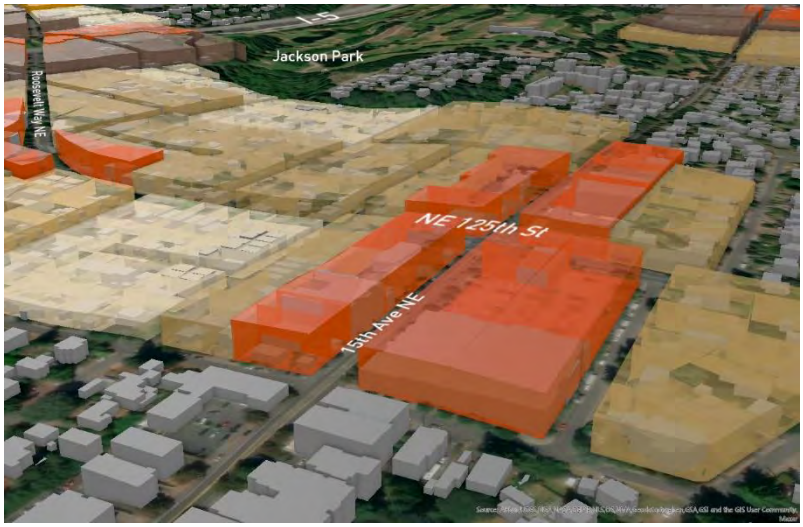
Height, bulk, and scale. Under Alternative 5, the area immediately next to the 130th light rail station could transition from primarily 1- and 2-story buildings up to 7- and 8-story buildings. The heights of buildings surrounding the 130th station, both to the east and the first block west of I-5 along 130th Street, could also develop over time into 6- to 8-story buildings. The core of the 145th station area would likely redevelop into a mixed-use node with buildings up to 7- and 8-stories, while heights in the surrounding area would be similar to the No Action Alternative. In the rest of the new urban center area, many existing 1- and 2-story buildings would likely develop over time into 3- to 5-story buildings. **Exhibit 3.6-117** and **Exhibit 3.6-118** illustrate potential redevelopment over 20 years; exact amount, locations, and design of redevelopment may vary. It would likely happen incrementally (i.e., site by site) as property owners choose to develop their property and/or aggregate properties for larger redevelopments.

Like Alternative 2, specific height/bulk/scale impacts would include:

- **Urban design and active transportation: Intersite connectivity.** This challenge may be more pronounced than Alternative 2 as even greater intensities develop near the station without direct routes.
- **Street-level community building: Lack of focused public realm.** Similarly, with more areas expected to redevelop, this challenge may be more widespread as more parcels redevelop without a cohesive street/path network.
- **Street level community building: Affordable commercial space.** With even greater redevelopment expected, the potential displacement of small and BIPOC-owned businesses may impact cultural and social gathering spaces more than Alternative 2.

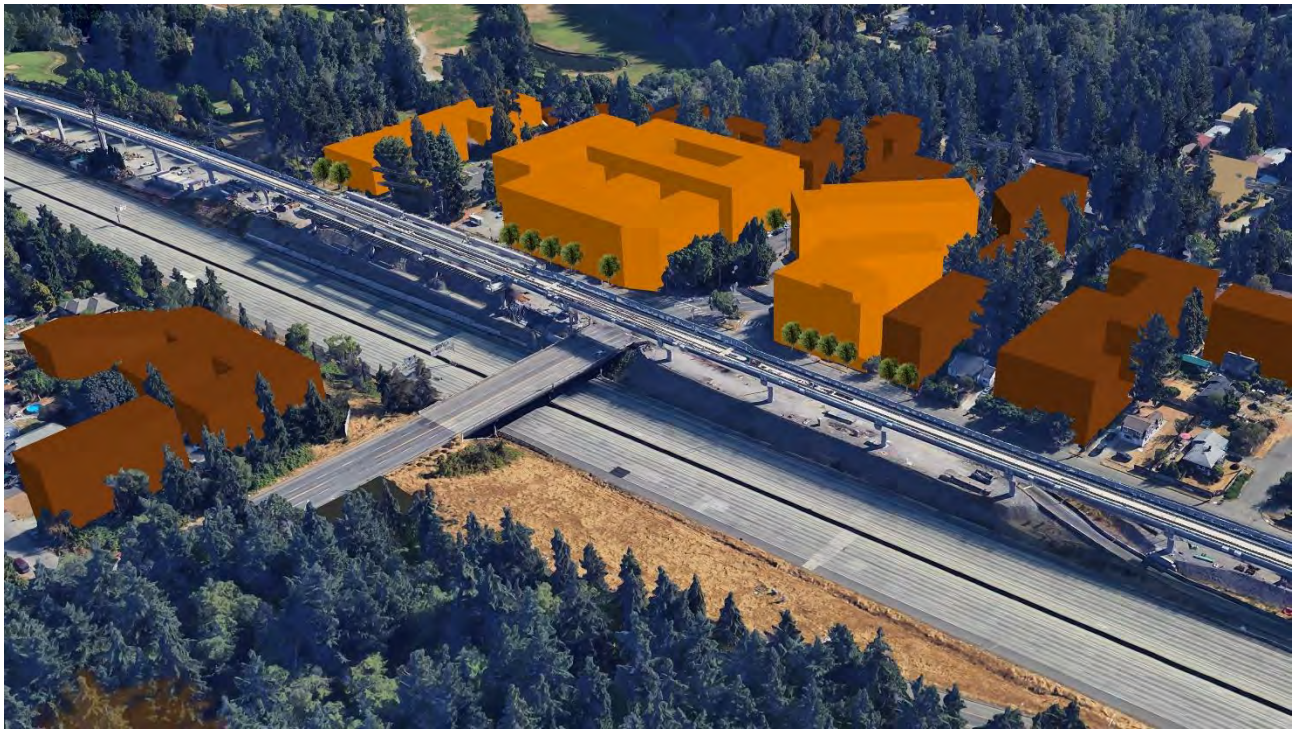
Exhibit 3.6-117. Proposed 130th/145th Station Area Allowed Building Heights—Alternative 5





Note: These model views illustrate proposed building height limits in proposed neighborhood centers and urban centers. Building envelopes would also be influenced by FAR, setback, and upper story step back regulations.
Source: MAKERS, 2023.

Exhibit 3.6-118. 130th Station Area Massing Illustration—Alternative 5



Note: This model illustrates potential redevelopment over the next 20 years and building massings that maximize allowed FAR and heights while adhering to setback and zone transition regulations. Possible NC redevelopment is shown in orange, MR in brown, and LR in beige. It is not intended to show exact locations of development but that market-driven, incremental redevelopment over time would occur.
Source: City of Seattle, 2023; MAKERS, 2023.

Transitions. Under Alternative 5, development of high-intensity buildings in the immediate vicinity of the 130th station area (proposed NC zone), as well as the larger proposed MR area, may create abrupt local transitions in scale between existing detached houses and new larger construction, even more so than Alternative 2. Over time, an evolution of the station area into more consistently intensely used land, combined with smaller scale development in surrounding low-rise zones would result in a more gradual transition. See **Exhibit 3.6-119**.

Views. Changes to views along the I-5 scenic corridor, which are mostly blocked because of noise walls and/or I-5 being below grade, would be similar to Alternative 2. More buildings would be visible on both sides of I-5, but they would be a minor part of the view.

Exhibit 3.6-119. Pinehurst Massing Illustration—Alternative 5

Note: This model illustrates potential redevelopment over the next 20 years and building massings that maximize allowed FAR and heights while adhering to setback and zone transition regulations. Possible NC redevelopment is shown in orange and LR in beige. It is not intended to show exact locations of development but that market-driven, incremental redevelopment over time would occur.
Source: City of Seattle, 2023; MAKERS, 2023.

Equity & Climate Vulnerability Considerations

Housing Type Variety and Choice

Alternative 5 combines the place types found in Alternatives 2-4 and therefore could provide the most housing type variety and choice amongst all the alternatives. The likely increase in variety would provide more options for people to stay in their community over a lifetime and across generations as their needs change. Housing configurations that cluster more units together on a site could provide more opportunities for intergenerational families to live near each other. Increasing housing type options across the city also increases the opportunities for people to live in parts of the city economically closed off to them ~~in~~ under Alternative 1.

Relationship to Active Transportation

Among all alternatives, Alternative 5 could increase density the most across the city, near transit, and near large parks. Nearby parks, commercial, and office areas provide locations where people can walk and roll for their work, shopping, play, and leisure needs. More people

living within a 10-minute walk from light rail and a 5-minute walk from frequent bus transit likely increases the number of people walking, rolling, and using transit. Such a change would help mitigate climate impacts and improve chances at social connectedness.

Relationship to Social Wellbeing & Sociability

Alternative 5, with the increase in middle housing types and variety throughout the city and fewer concentrated extremes of higher and lower density areas, would likely have overall positive impacts on social wellbeing and social interactions, similar to Alternative 3. Impacts described in Alternative 4's **Relationship to Social Wellbeing & Sociability** section related sociability along arterials would also pertain to Alternative 5, but perhaps to a lesser degree with development opportunities more dispersed in Alternative 5.

Climate Change

No additional impacts to climate change are anticipated under Alternative 5 above those described under the other action alternatives. Growth under Alternative 5 would be concentrated in centers and corridors, away from most hazards, with additional growth spread throughout the urban neighborhoods. Like Alternative 3, distributing more growth in urban neighborhoods could increase the potential for populations to be closer to hazards or affected by interruptions in access to their neighborhoods. Like the other action alternatives, Alternative 5 would include a new Environment and Climate Element with mitigation and adaptation strategies as well as policies regarding tree canopy protection or enhancement and critical area regulations. See also the discussion under **Impacts Common to All Alternatives**.

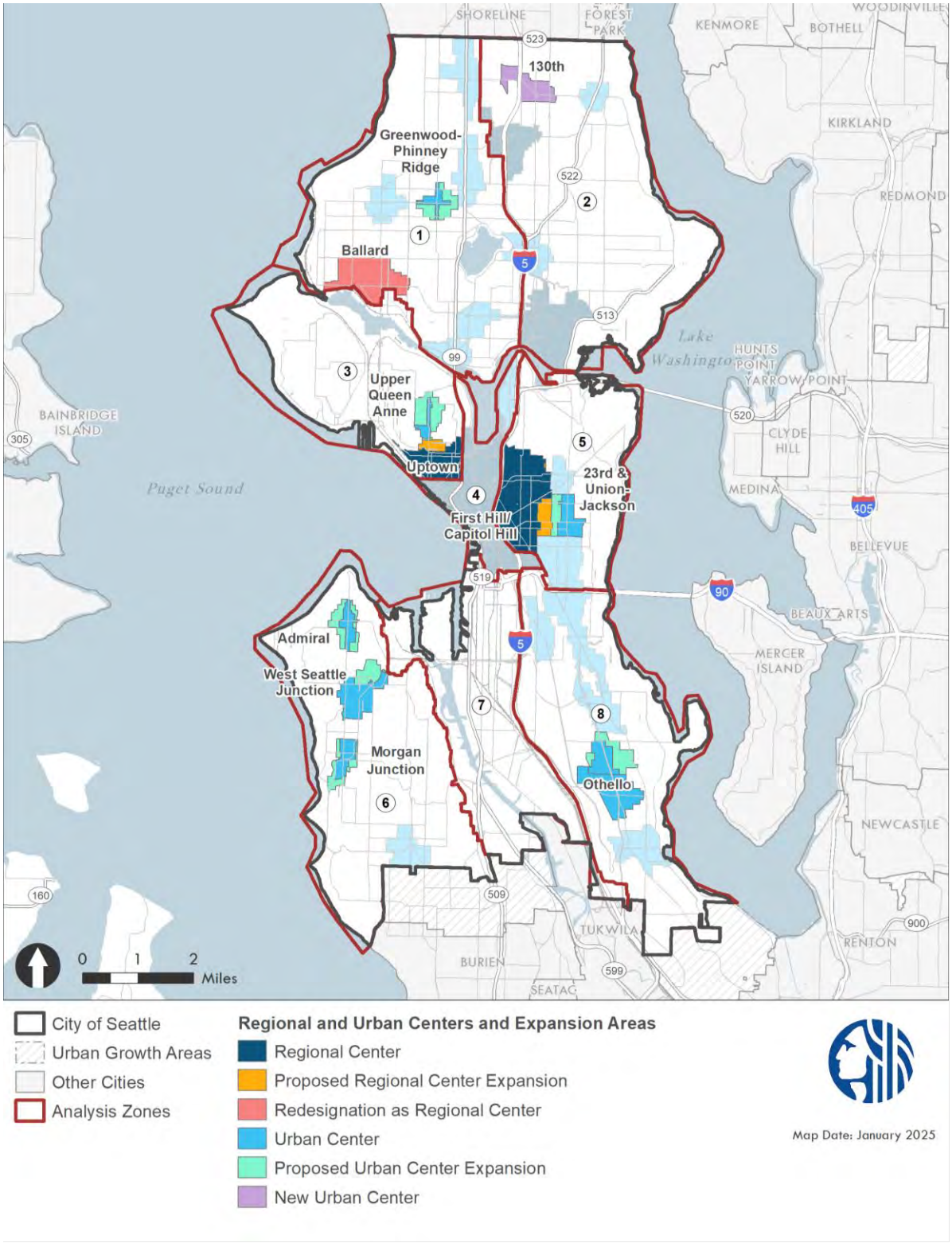
Impacts of Preferred Alternative

Note: The impacts analysis for the Preferred Alternative was added since the Draft EIS.

Land Use Patterns & Compatibility

The Preferred Alternative anticipates an increase in supply and diversity of housing across Seattle similar to Alternative 5. It includes the strategies for encouraging housing growth in the other action alternatives plus some additional changes to existing center boundaries and changes to place type designations beyond Alternative 5 (see **Exhibit 2.4-28**). The Preferred Alternative expands the boundaries of nine centers (the First Hill/Capitol Hill Regional Center, Uptown Regional Center and 23rd & Union Jackson, West Seattle Junction, Admiral, Greenwood-Phinney Ridge, Morgan Junction, Othello, and Upper Queen Anne Urban Centers), designates the NE 130th Street Station Area as a new urban center, and re-designates Ballard as a regional center (see **Exhibit 3.6-120**). 23rd & Union Jackson and Othello would also be split into two urban centers each (Central District, Judkins Park, Othello, and Graham) in addition to the expanded boundaries and South Park would be redesignated as a neighborhood center (previously an urban center under the other alternatives). The Preferred Alternative also includes 30 new neighborhood centers similar to Alternatives 2 and 5. However, boundaries of the neighborhood centers are defined in more detail under the Preferred Alternative, including five with notably expanded or shifted boundaries compared to Alternatives 2 and 5: North Magnolia, High Point, Mid Beacon Hill, Upper Fremont, and Hillman City (these were mostly a combination of neighborhood center and corridor place types with some urban neighborhood under Alternative 5).

Exhibit 3.6-120. Expanded, Redesignated, and New Regional and Urban Centers—Preferred



Note: See **Exhibit 2.1-1** in **Chapter 2** for a crosswalk of existing place types (existing and Alternative 1) versus proposed place type names under the other alternatives.
Source: City of Seattle, 2024; BERK, 2025.

Like Alternative 5, the Preferred Alternative studies total housing growth of 120,000 housing units (40,000 more than the No Action Alternative and 20,000 more than Alternatives 2, 3, or 4) to account for potential additional housing demand that could be met within the areas of change. As described under **Impacts Common to All Alternatives**, most new growth would still be focused within the centers currently characterized by higher densities, more compact building forms, and a more diverse mix of uses than other areas of the city. Housing growth within the centers would be slightly lower under the Preferred Alternative than the No Action Alternative but higher than Alternative 3.

Land use patterns and potential compatibility impacts within most of the centers would be similar to those described under **Impacts Common to All Alternatives**. The nine expanded center boundaries consist primarily of single-family residential areas neighboring mixed-use and commercial development nodes within the existing center boundaries. Over time, these areas would gradually convert to denser multifamily residential and mixed-use patterns of development. The Uptown Regional Center expansion area and expansion area in Squire Park (including First Hill/Capitol Hill, Central District, and Judkins Park) primarily consist of existing multifamily development—as a result, future land use patterns would likely be similar in scale and intensity to the No Action Alternative even if these areas redevelop with more mixed use. Adverse compatibility impacts at the periphery of most centers would be minimized under the Preferred Alternative as the abutting neighborhood center, corridor, and urban neighborhood areas redevelop (see also the **Transitions** section below).

Activity levels and activity units per acre would vary from the other alternatives as a result of the increased overall growth and change in center boundaries. Under the Preferred Alternative, the redesignated Ballard Regional Center would meet PSRC's Urban Regional Growth Center size and activity unit density criteria. University Community and Northgate would also meet PSRC's future activity unit threshold for Urban RGCs (like the other alternatives) as would Uptown which could result in redesignation from Metro to Urban RGC in the future. All urban centers would meet King County's minimum future density criteria for Countywide Centers (including, the split Othello and Graham centers and Rainier Beach). Green Lake, Lake City, and Madison-Miller would still be outside the size threshold. See **Exhibit 3.6-121**.

PSRC RGCs require a minimum density of 30 existing activity units and 85 planned activity units for Metro RGCs, 18 existing activity units and 45 planned activity units for Urban RGCs, and are expected to be between 320–640 acres in size (or larger if served by an internal, high-capacity transit system). Appendix 6 of the King County CPPs includes higher activity unit thresholds for Metro and Urban RGCs (60 existing/120 planned for Metro RGCs and 30 existing/60 planned for Urban RGCs). Per the CPPs, not meeting existing activity unit thresholds for existing centers (all of Seattle's Regional Centers except for Ballard under the Preferred Alternative) is not grounds for de-designation or re-designation by the Growth Management Planning Council.

King County countywide centers require an existing density of at least 18 activity units and planned density of at least 30 activity units and are expected to be between 160–500 acres in size.

See also **Section 3.7 Relationship to Plans, Policies, & Regulations**.

Exhibit 3.6-121. Future Activity Units (AU)—Preferred Alternative

Center	Draft EIS Analysis[3]		Preferred Alternative Analysis[4]			
	Existing AU/Ac.	Alt. 1 AU/Ac.	Existing AU/Ac.	Acres	2044 AU	2044 AU/Ac.
Regional Centers[1]						
Downtown	377.4	473.2	253.3	952	318,003	334.0
First Hill/Capitol Hill[2]	139.5	163.4	111.5	1,015	131,529	129.6
University Community	54.5	70.2	99.5	753	83,950	111.4
South Lake Union	236.7	344.1	275.7	340	125,946	370.6
Uptown[2]	131.3	161.3	81.1	389	39,574	101.9
Northgate	57.3	75.1	46.6	412	25,073	60.8
Ballard[2]	67.7	96.9	57.9	495	41,457	83.7
Hub Urban Centers[1]						
Bitter Lake Village	44.0	55.4	30.3	364	14,975	41.2
Fremont	71.9	88.1	68.3	214	17,331	80.8
Lake City	57.6	75.4	49.2	142	9,453	66.5
Mt Baker	36.0	47.4	28.7	491	19,679	40.1
West Seattle Junction[2]	70.4	100.2	47.9	367	24,822	67.6
Residential Urban Centers[1]						
130th Street[2]	18.4	20.7	17.3	217	7,210	33.2
23rd & Union-Jackson[2]	38.9	46.5	—	—	—	—
Central District	—	—	31.6	232	10,345	44.6
Judkins Park			39.3	467	21,743	46.5
Admiral[2]	49.2	60.4	29.9	219	8,287	37.8
Aurora-Licton Springs	44.1	51.4	33.1	327	13,155	40.2
Columbia City	33.9	46.1	36.7	335	16,692	49.9
Crown Hill	25.3	31.4	26.6	271	9,004	33.2
Eastlake	70.2	82.0	65.5	199	14,930	74.9
Green Lake	70.6	87.4	59.7	109	7,683	70.7
Greenwood-Phinney Ridge[2]	84.5	101.6	42.3	197	10,900	55.3
Madison-Miller	65.3	85.1	55.5	145	10,339	71.2
Morgan Junction[2]	34.1	41.6	26.8	198	6,940	35.1
North Beacon Hill	28.1	34.5	31.8	267	9,963	37.3
Othello[2]	23.7	29.0	—	—	—	—
Graham	—	—	18.3	291	9,328	32.0
Othello			33.4	353	12,632	35.8
Rainier Beach	23.0	26.0	19.9	346	10,553	30.5
Roosevelt	61.4	81.2	55.5	170	12,391	72.8
Upper Queen Anne[2]	89.5	110.5	39.0	208	9,763	46.9
Wallingford	42.2	51.5	40.6	258	12,349	47.9
Westwood-Highland Park	27.9	32.6	25.8	275	8,302	30.2

1 See **Exhibit 2.1-1** in **Chapter 2** for a cross-walk of existing place types (existing and Alternative 1) versus proposed place type names under the other alternatives.

2 Proposed new center, redesignated center, or boundary expansion. Ballard would be redesignated as a regional center, a new urban center created at 130th Street, 23rd & Union Jackson split into two urban centers (Central District and Judkins Park), and Othello split into two urban centers (Othello, and Graham).
3 For the Draft EIS analysis, existing housing units and jobs were estimated based on 2022 housing data from OFM, summarized job data from PSRC, and the existing center boundaries (e.g., these are not based on site level data and are used as estimates for comparing the alternatives only). The Draft EIS No Action Alternative added growth to these existing numbers and assumed an average household size of 2.05 across all centers per the King County Growth Management Planning Council to determine future activity units.
4 The Preferred Alternative uses updated and more detailed information to calculate existing and future activity units per acre for each center than Alternatives 1–5. Existing activity units per acre by center are based on OFM's 2023 SAEP April 1 census block estimate of total population and PSRC's 2023 estimate of all jobs (estimated by starting with ESD Q1 Covered Employment and estimating the remaining jobs not covered by unemployment insurance) within the revised center boundaries of the Preferred Alternative. Future 2044 population by center was calculated using OFM's 2023 housing unit estimate, additional housing unit permits issued between April 1, 2023 and June 1, 2024 (since the 2023 OFM estimate), a citywide household occupancy rate of 93%, estimated existing people per household by center (per OFM's 2023 household and population estimates), and housing unit growth targets. Future 2044 jobs by center were calculated using PSRC's 2023 covered employment estimate and job growth targets. Future 2044 activity units per acre for each center are based on the combined estimated 2044 population and jobs and acres within each center (including revised center boundaries under the Preferred Alternative). See **Appendix B**.
Note: Activity units (AU) is the sum of residential population and jobs. Highlighted hub and residential urban centers fall outside King County's countywide center designation criteria of 160–500 acres or below the minimum 18 existing AU or 30 future AU per acre. MIC designation criteria from PSRC does not include an AU density threshold.
Sources: OFM SAEP April 1 census block estimates, 2022 and 2023; PSRC, 2023; City of Seattle, 2024; BERK, 2024.

Under the Preferred Alternative, urban neighborhood areas would accommodate the second highest share of anticipated housing growth behind regional centers (see **Chapter 2**). Urban neighborhood areas would accommodate a similar share of housing growth as Alternative 3 (20% under the Preferred Alternative and 22% under Alternative 3) but an overall slightly higher amount of housing growth as a result of higher studied growth overall. More than half (58%) of the additional new housing growth in urban neighborhood areas would be directed into areas 1 and 2. A small number of jobs and commercial space would shift from the regional and urban centers towards urban neighborhood areas to reflect local demand consistent with the distribution of new housing. The Preferred Alternative also allows more flexibility for commercial space in these areas (like Alternative 3) to support the development of neighborhoods where more people can walk to everyday needs.

A little less than half (45%) of housing growth in neighborhood centers would be directed into those with low displacement risk in areas 1 and 2 and about 21% would be directed into neighborhood centers with high displacement risk (generally in areas 6, 7, and 8). Housing growth in the corridors would be in between Alternatives 4 and 5 but spread over a smaller share of land area than Alternative 4 or 5—this growth would be focused in Area 2 followed by areas 1, 8, 5, and 6. Land use patterns and potential adverse compatibility impacts within the new place types would be similar to those described under Alternatives 2, 3, and 4.

Overall, Area 1 would receive the greatest overall share of new housing growth under the Preferred Alternative (21%), followed by Area 2 (20%) and Area 4 (16%). The Preferred Alternative distributes growth similar to Alternative 5, although the distribution is slightly

different across the neighborhood center, corridor, and urban neighborhood place types given varied boundaries. This is likely to result in a denser land use pattern citywide with focused growth in the centers and smaller mixed-use nodes in the new neighborhood centers and near corridors with frequent transit. Impacts would be mitigated through application of the City's development regulations (including shoreline regulations) and design review process.

Urban Form

Height, Bulk, & Scale

The Preferred Alternative would have similar impacts as Alternative 5 (see **Exhibit 3.6-113**), except urban neighborhood areas (i.e., Neighborhood Residential and Lowrise zones) would allow 32 feet instead of 30. This additional 2 feet makes 3-story development more feasible and can generally improve aesthetics by accommodating a greater roof pitch or roof form variations, as well as allowing for taller ceiling heights, making units more livable. It would not create negative height, bulk, or scale impacts.

The Preferred Alternative includes several place type boundary changes, none of which create greater impacts than Alternative 5. These changes include the following:

- The zoning boundaries for neighborhood centers are more defined under the Preferred Alternative, but their proposed height limits and bulk standards are no greater than Alternative 5.
- The Preferred Alternative expands the First Hill/Capitol Hill Regional Center and 23rd and Union-Jackson (Central District) Urban Center. This simplifies the Center boundaries and connects similarly scaled urban areas. Proposed zoning in these areas has no taller height limits than Alternative 5.
- The Preferred Alternative redesignates South Park as a neighborhood center, while Alternative 5 showed South Park as an urban center. Zoning proposals show modest upzones consistent with a neighborhood center, with no greater height/bulk/scale impacts than Alternative 5.

Transitions

The Preferred Alternative's impact on transitions between and within zones is similar to Alternative 5. Neighborhood centers and corridors (generally narrower areas than in Alternative 5) will likely see redevelopment that may have stark contrasts in building scale as compared to existing. But as with Alternative 5, these are expected as part of a gradual transition into typical heights, bulks, and scales of urban centers and neighborhoods.

The Preferred Alternative's proposed zoning makes several development standards more consistent between Neighborhood Residential and Lowrise zones—and amongst their various building types, including setbacks, maximum façade length, design standards, FAR bonus for

stacked flats, amenity area, stormwater features in setbacks, and separations between buildings.

Tree Canopy

Overall, the Preferred Alternative's impacts to tree canopy would be similar to Alternative 5. Two zoning proposals clarified in the Preferred Alternative (see **Appendix J Proposed Legislation**) may improve chances at increasing tree canopy:

- The Preferred Alternative's proposed reduction in minimum spacing between buildings in Neighborhood Residential and Lowrise zones from 10 feet to 6 feet may increase opportunities for consolidated open space that is large enough for plantings/trees, rather than narrow, unusable strips of land between buildings.
- The slight reduction in parking space minimum width from 8.5 feet to 8 feet will also improve the chances at larger areas for plantings and tree roots.

Shadows

Shadow impacts would be no greater than Alternative 5. These include modestly increased potential for shadows on public rights-of-way and parks in expanded regional and urban centers, neighborhood centers, and along corridors.

Views

Like Alternative 5, view impacts are expected to scenic routes, view corridors, and landmark views. SEPA-protected views may continue to be protected through project-scale SEPA analysis. Shoreline views are unlikely to be blocked but may change—and potentially become more interesting—with redevelopment.

130th/145th Station Area

Land Use Patterns & Compatibility

Under the Preferred Alternative, a new urban center would be designated on both the west and east sides of I-5 at the Sound Transit light rail station, with zoning including Low-rise Residential (LR1 and LR3), Midrise Multifamily (MR2), and Neighborhood Commercial (NC2). This area would include an existing commercial node around Pinehurst and an expanded residential mixed-use area closer to the station. Housing and job growth in the new 130th Street Urban Center would be similar to but slightly less than Alternative 5 with a little less housing growth and almost the same job growth.

Overall growth in the 145th Station Area would be less than the No Action Alternative. With a similar amount of housing but about half the expected job growth. Zoning would include Low-rise Residential (LR3) and Neighborhood Commercial (NC2 and NC3). Like Alternative 5,

buildings would be denser than Alternative 2 with more mixed-use buildings and a wider variety of housing types allowed.

Over time, the station areas would likely redevelop into mixed-use nodes. Growth would increase activity unit density from 17.3 (existing) to 33.2 around NE 130th Street. Like Alternative 5, this increased density around NE 130th Street would represent a potential adverse land use impact of future growth in the station area. Growth would also increase activity unit density from 39.2 (existing) to 69.6 around 15th and 145th, only slightly higher than the No Action Alternative (64.9; see **Exhibit 3.6-84**). However, growth would be concentrated over a smaller area (53 acres versus 65 acres) with slightly denser mixed-use buildings and a wider variety of housing types which is a potential adverse land use impact of future growth in the station area. Impacts in both station areas would be mitigated through application of the City's development regulations and design review process. In addition, increased density citywide would lessen potential adverse compatibility impacts on the periphery of all new urban centers and neighborhood centers, including the station areas (see also the **Transitions** section below).

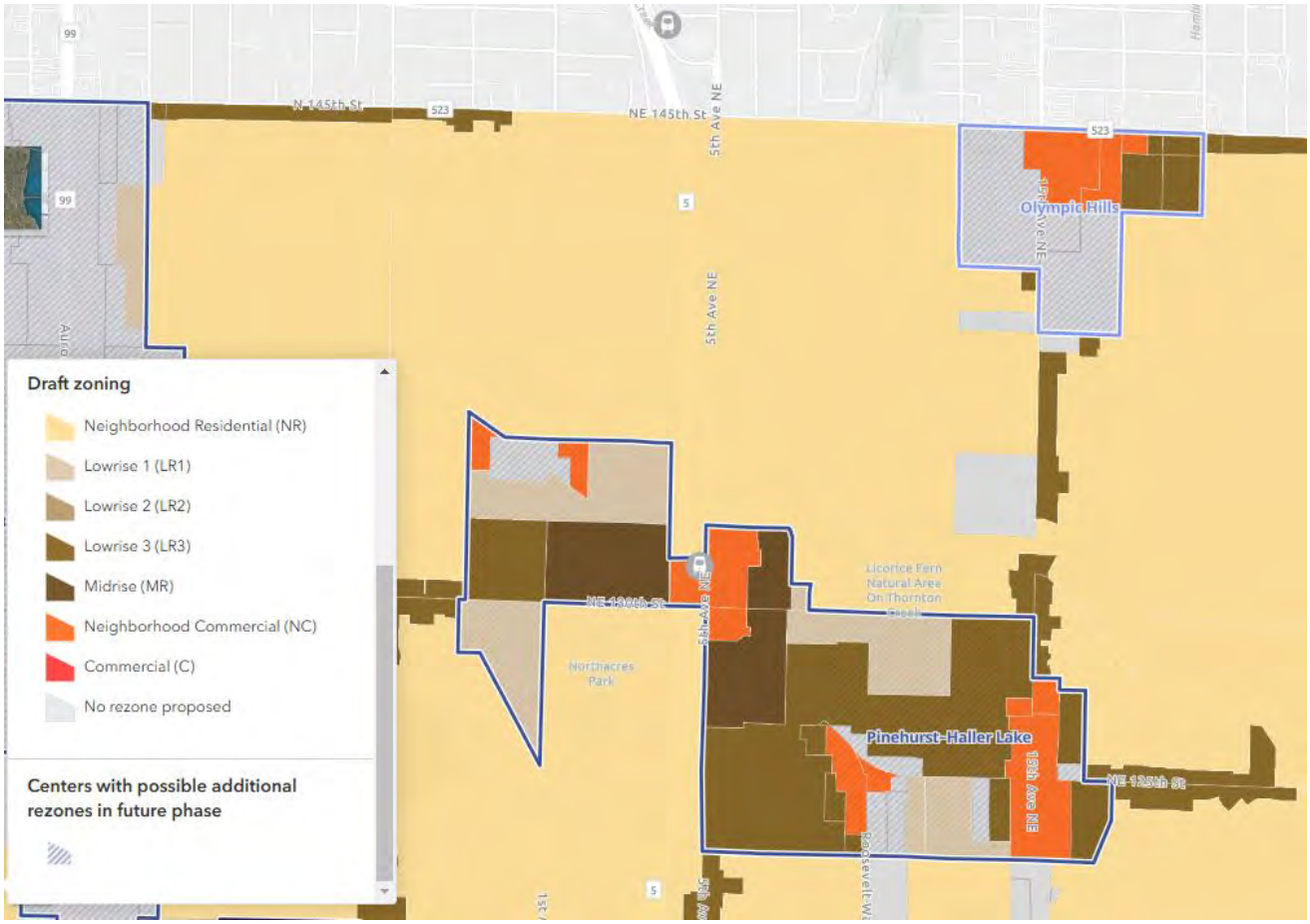
See **Exhibit 3.6-122** and **Exhibit 3.6-123**.

Exhibit 3.6-122. Station Area Share of Targets, 2024-2044—Preferred Alternative

Location	Place Type[1]	Acres	New Housing Units	New Jobs	Activity Units (Existing)/Ac.[2]	Activity Units (Future)/Ac.[2]
NE 130th Street	Urban Center	217	1,500	360	17.3	33.2
15th & 145th[3]	Neighborhood Center	53	652	298	39.2	69.6

1 See **Exhibit 2.1-1** for a crosswalk of existing place types (existing and Alternative 1) versus proposed place type names under Alternatives 25. The 130th Street and Pinehurst Neighborhood Centers from Alternative 2 are both part of the 130th Street Urban Center in Alternative 5.
2 The Preferred Alternative uses updated and more detailed information to calculate existing and future activity units per acre for each center than Alternatives 1–5. Existing activity units per acre by center are based on OFM's 2023 SAEP April 1 census block estimate of total population and PSRC's 2023 estimate of all jobs (estimated by starting with ESD Q1 Covered Employment and estimating the remaining jobs not covered by unemployment insurance) within the revised center boundaries of the Preferred Alternative. Future 2044 population by center was calculated using OFM's 2023 housing unit estimate, additional housing unit permits issued between April 1, 2023 and June 1, 2024 (since the 2023 OFM estimate), a citywide household occupancy rate of 93%, estimated existing people per household by center (per OFM's 2023 household and population estimates), and housing unit growth targets. Future 2044 jobs by center were calculated using PSRC's 2023 covered employment estimate and job growth targets. Future 2044 activity units per acre for each center are based on the combined estimated 2044 population and jobs and acres within each center (including revised center boundaries under the Preferred Alternative). See **Appendix B**.
3 Renamed Olympic Hills under the Preferred Alternative.
Source: OFM, 2023 (estimates of 2023 housing, households, household population, and group quarter population are from OFM's SAEP April 1 census block estimates); PSRC, 2023; City of Seattle, 2024; BERK, 2024.

Exhibit 3.6-123. 130th/145th Station Area Zoning Concepts—Preferred Alternative



Note: See **Exhibit 2.1-1** in **Chapter 2** for a cross-walk of existing place types (existing and Alternative 1) versus proposed place type names under the other alternatives.
Source: City of Seattle, 2024.

Urban Form

Height, bulk, and scale. Under the Preferred Alternative, zoning proposals nearly match Alternative 5, with just one area along Roosevelt Way N at 1st Ave NE remaining at NC1-55 instead of Alternative 5's proposed NC2-55. This means that the height, bulk, and scale impacts are very similar to Alternative 5's, with that area surrounding the 130th light rail station transitioning from 1- and 2-story buildings to 6- to 8-story buildings over time. Likewise, the 145th station area would likely redevelop with 7- to 8-story buildings. Other areas may transition from 1- and 2-story buildings to 3- to 5-story buildings. **Exhibit 3.6-117** and **Exhibit 3.6-118** illustrate potential redevelopment over 20 years; exact amount, locations, and design of redevelopment may vary. It would likely happen incrementally (i.e., site by site) as property owners choose to develop their property and/or aggregate properties for larger redevelopments.

Like Alternatives 2 and 5, specific height/bulk/scale impacts would include:

- **Urban design and active transportation: Intersite connectivity.** The block bounded by 5th Ave NE, NE 130th St, 8th Ave NE, and Jackson Park is approximately 660 feet by 690 feet and currently has no through access; NE 131st Place is a private access drive and 8th Ct NE is a short dead-end right-of-way. With redevelopment, the lack of an existing finer-grained and connected network of streets means that redevelopment, without requirements for greater connectivity, could result in development that is fractured and doesn't have great connections to existing streets and the light rail station.
- **Street-level community building: Lack of focused public realm.** Because of the limited street grid, piecemeal redevelopment could result in individual, unrelated, disconnected developments lacking a cohesive orientation toward public streets, a focused public realm, or opportunities for shared social gathering. Building entries could be hidden or facing different directions within a block accessed by long, private driveways.
- **Street level community building: Affordable commercial space.** 15th Ave NE, both in the 145th station area and Pinehurst, as well as NE 125th St at 15th Ave NE and Roosevelt Way NE south of NE 125th St, would likely see greater levels of activity, enlivening the street level experience. However, many small commercial spaces currently exist in strip malls or in adapted houses in these areas. With redevelopment, maintaining affordable commercial space in the area for local and BIPOC-owned businesses may be challenging, impacting the social and cultural ties to these neighborhood centers.

Transitions. Like Alternative 5, development under the Preferred Alternative may create short-term abrupt local transitions in scale, but will likely evolve over time into more consistent scales with gradual transitions into Lowrise and Neighborhood Residential zones.

Views. Changes to views along the I-5 scenic corridor, which are mostly blocked because of noise walls and/or I-5 being below grade, would be similar to Alternative 2 and Alternative 5. More buildings would be visible on both sides of I-5, but they would be a minor part of the view.

Equity & Climate Vulnerability Considerations

Housing Type Variety and Choice

The Preferred Alternative combines the place types found in Alternatives 2-4 and could therefore provide more housing type variety and choice. Like Alternative 5, the likely increase in variety would provide more options for people to stay in their community over a lifetime and across generations as their needs change. Housing configurations that cluster more units together on a site could provide more opportunities for intergenerational families to live near each other. Increasing housing type options across the city also increases the opportunities for people to live in parts of the city economically closed off to them under Alternative 1.

Relationship to Active Transportation

Similar to Alternative 5, the Preferred Alternative could increase density across the city, near transit, near neighborhood commercial centers, and near large parks. Nearby parks,

commercial, and office areas provide locations where people can walk and roll for their work, shopping, play, and leisure needs. More people living within a 10-minute walk from light rail and a 5-minute walk from frequent bus transit likely increases the number of people walking, rolling, and using transit. Such a change would help mitigate climate impacts and improve chances for social connection.

Relationship to Social Wellbeing & Sociability

Impacts on social wellbeing and social interactions under the Preferred Alternative would be similar to those described under Alternative 5. The increase in middle housing types and variety throughout the city and fewer concentrated extremes of higher and lower density areas would likely have overall positive impacts (similar to Alternatives 3 and 5). Likewise, impacts along arterials would be similar to those described under Alternative 4, but with narrower bands of higher intensity zoning along the arterials, a greater proportion of new development may occur immediately along inhospitable arterials—where social interactions can be inhibited by traffic's impact on sense of safety, air quality, and noise—rather than a block or two away where the benefits of transit access are gained without the negative impacts. That said, like Alternative 5, the Preferred Alternative's greater dispersion of development opportunities throughout the city means the impacts along arterials would likely be less than Alternative 4.

Climate Change

Impacts to climate change under the Preferred Alternative would be similar to those described for Alternative 5. Growth under the Preferred Alternative would be concentrated in centers and corridors, away from most hazards, with additional growth spread throughout the urban neighborhoods. Like Alternative 5, distributing more growth in urban neighborhoods could increase the potential for populations to be closer to hazards or affected by interruptions in access to their neighborhoods. Like the other action alternatives, the Preferred Alternative would include a new Environment and Climate Element with mitigation and adaptation strategies as well as policies regarding tree canopy protection or enhancement and critical area regulations. See also the discussion under **Impacts Common to All Alternatives**.

Summary of Impacts

Exhibit 3.6-124, **Exhibit 3.6-125**, and the following text summarize and compare adverse land use impacts citywide and within the 130th/145th station areas under each alternative.

Citywide

Exhibit 3.6-124. Summary of Land Use and Urban Form Impacts by Alternative—Citywide

Impact	No Action	Alt. 2	Alt. 3	Alt. 4	Alt. 5	Preferred
Land Use Patterns	▽	▼	▽	▼	▼	▼
Land Use Compatibility	▽	▼	▼	▼	▽	▽
Height, Bulk, & Scale	▽	▼	▼	▼	▼	▼
Transitions	▼	▽	▲	△	▲	▲
Tree Canopy	▽	▽	▼	▼	▼	▼
Shadows	▽	▼	▽	▽	▼	▼
Views	—	—	—	▽	▽	▽

Note: Impacts are considered either unavoidable adverse (▼▼), adverse but able to be mitigated (▼), impact but less than adverse (▽), limited or none (—), moderately positive (△), or positive (▲). The Preferred Alternative was added to this exhibit since the Draft EIS—no changes were made to the impact summary for Alternatives 1–5.
Sources: BERK, 2024~~3~~; MAKERS, 2024~~3~~.

Land use patterns. Growth under all alternatives would increase activity levels and land use intensities across the city resulting in likely adverse impacts to land use patterns. All alternatives focus most future growth into centers currently characterized by higher densities, more compact building forms, and a more diverse mix of uses than other areas of the city. Land use patterns in the neighborhood centers and corridors would intensify more under Alternatives 2 and 4, respectively, than under the No Action Alternative. Under Alternative 3, overall land use patterns would become denser over time within the Neighborhood Residential zones but most of this development would continue to be residential in nature and would be more spread throughout the analysis areas than the other action alternatives. Alternative 5 and the Preferred Alternative includes the most growth overall and incorporates elements of the other action alternatives—the intensity of land use patterns would shift most dramatically under Alternative 5 and the Preferred Alternative as activity levels increase over time.

Land use compatibility. Future growth under all alternatives is likely to increase the frequency of different land use types locating close to one another, and similarly likely to increase the frequency of land use patterns that contain mixes of land uses with differing levels of intensity, both within the centers and, to a varying extent, in other areas of the city. Land use incompatibilities under the No Action Alternative would be similar to those observed today but could become more severe over time with continuing trends. Under the action alternatives, denser and more mixed-use land use patterns in the new place types could result in localized

land use compatibility impacts within the place types or on the border with adjacent residential areas. All neighborhood centers, for instance, already contain areas zoned for commercial or mixed-use development but additional jobs and commercial space could increase more quickly in these areas due to the local demand from new housing. However, adverse compatibility impacts at the periphery of most existing centers would also be minimized as the new place types redevelop with denser development—this would be most noticeable over the long term under Alternative 5 and the Preferred Alternative as the abutting neighborhood center, corridors, and urban neighborhood areas redevelop. See also the summary of transitions below.

Height, bulk, and scale. Height, bulk, and scale impacts would likely occur under all alternatives as development occurs. Future growth and development directed into existing centers under all alternatives would result in a moderate amount of additional height and bulk in these commercial and mixed-use nodes generally consistent with that experienced during growth over the last 20 years. Under the action alternatives, building heights, bulk, and/or scale in the new place types would likely increase with new development. These impacts would be more pronounced in the neighborhood centers and corridors where height limits would be increased up to 5-7 stories. Where middle housing is allowed in urban neighborhood areas, more properties may develop with 3-story (or 4-story if affordable) buildings adjacent to 1- and 2-story buildings. The alternatives vary in the likelihood of localized impacts (Alternative 1, 2, and to some extent 4) versus more distributed impacts (Alternative 3 and 5 and the Preferred Alternative).

Transitions. Continued infill development in established centers and villages under the No Action Alternative would likely create increasingly stark contrasts with surrounding lower-scale areas. The new place types introduced under the action alternatives would generally reduce existing contrasts between centers (that see widespread development of large buildings) and surrounding areas (with broad areas that see minimal development). Over time, edges under Alternatives 3 and 5 and the Preferred Alternative would be softened the most as feathered gradations of intensity fill in around nodes of activity, neighborhood amenities, and existing centers.

Tree canopy. Bulkier development under all alternatives would likely displace some trees on private property, especially in residential zones. At the same time, the number of street trees may increase where they are required with redevelopment. Private property may see a greater loss of existing tree canopy under the action alternatives with more widespread redevelopment. For example, the increase in size and number of buildings allowed on a lot in Alternatives 3 and 5 and the Preferred Alternative will likely decrease the amount of space available for trees on neighborhood residential lots. See **Section 3.3.2** regarding differences parcel acres developed. More parcel acres developed would occur in the Neighborhood Residential place type under Alternatives 3 and the Preferred Alternative, but more would occur under Alternative 3 between the two alternatives.

Shadows. Under any alternative, taller and often bulkier redevelopment will cast longer and/or wider shadows than existing development. Building shadows can be considered positive for

climate adaptation to reduce summertime heat but can be negative for human health and wellbeing (especially during winter) and the health of existing trees if accustomed to full sun. Over time, increased height limits in the neighborhood centers under Alternatives 2, 4, and 5 and the Preferred Alternative would likely result in longer shadows over a greater portion of the day compared to the other alternatives and may be most impactful where shadows would fall downhill or on east-west oriented neighborhood main streets.

Views. Future development under Alternatives 1, 2, and 3 would present limited disruptions to public views. Growth would continue to concentrate in centers (which tend to contain few viewpoints). Most public viewpoints are outside the neighborhood centers in Alternative 2. There would be no height increase for market-rate development and a minimal height increase for affordable housing in the Neighborhood Residential zones under Alternative 3. Most of the protected viewpoints and scenic routes are within or adjacent to the more intense development expected in the corridor place type under Alternatives 4 and 5 and the Preferred Alternative, and a few are in or near the expanded regional and urban centers in Alternative 5 and the Preferred Alternative. Development under these alternatives may disrupt views in more places.

130th/145th Station Areas

Exhibit 3.6-125. Summary of Land Use and Urban Form Impacts by Alternative—130th/145th Station Areas

Impact	No Action	Alt. 2	Alt. 5	Preferred
Land Use Patterns	—	▼	▼	▼
Land Use Compatibility	▼	▼	▽	▽
Height, Bulk, & Scale	▽	▼	▼	▼
Transitions	▼	▽	▲	▲
Tree Canopy	▽	▽	▼	▼
Shadows	▽	▼	▼	▼
Views	—	—	▽	▽

Note: Impacts are considered either unavoidable adverse (▼▼), adverse but able to be mitigated (▼), impact but less than adverse (▽), limited or none (—), moderately positive (△), or positive (▲). The Preferred Alternative was added to this exhibit since the Draft EIS—no changes were made to the impact summary for Alternatives 1–5.
Sources: BERK, 2023; MAKERS, 2023.

Land use patterns and compatibility. No adverse impacts to land use patterns are expected in the station areas under the No Action Alternative. Under this alternative, no new areas would be designated for mixed-use or higher density and building types outside existing commercial zoning would remain primarily single purpose with some multi-family uses near the 145th BRT station. Few parcels around 130th would be likely to fully redevelop under the No Action Alternative, though more may see additions (e.g., ADUs) and rebuilds consistent with the existing land use patterns. However, the area may still see increased activity under the No

Action Alternative over time as people seek to access the light rail station which could result in compatibility impacts with surrounding lower density residential development. Greater change would occur in the areas currently zoned for more intense development, including the 145th BRT station area and Pinehurst area.

Under Alternatives 2 and 5 and the Preferred Alternative, both station areas would likely redevelop into mixed-use nodes with more growth at greater heights clustered in the newly designated neighborhood centers (Alternatives 2 and 5 and the Preferred Alternative) and urban center (Alternative 5 and the Preferred Alternative). Activity levels and land use intensities would increase resulting in greater impacts to land use patterns than the No Action Alternative. Compatibility impacts would be similar to those described citywide for neighborhood and urban centers.

Height, bulk, and scale. Changes to height, bulk, and scale would be limited under the No Action Alternative and primarily within the 145th station area. Under Alternatives 2 and 5 and the Preferred Alternative, the station areas could see extensive changes to height, bulk, and scale as a result of proposed zoning capacity increases combined with proximity to the new light rail station. Heights could reach up to 7-8 stories immediately adjacent to the 130th light rail station and in the core of the 145th station area. 15th Ave NE (both in the 145th station area and Pinehurst) as well as NE 125th St at 15th Ave NE and Roosevelt Way NE south of NE 125th St would likely see greater levels of activity, enlivening the street level experience. However, many small commercial spaces currently exist in strip malls or in adapted houses in these areas.

Under all alternatives, large superblocks (longer than 600 feet) lacking a connected internal path or street network also mean that direct routes to access the station will be challenging without regulations to encourage or require through connections with redevelopment. Redevelopment at the light rail station would occur in a physically bifurcated, uncomfortable human environment (at 5th Ave NE, Roosevelt Way, and I-5) and could miss an opportunity to celebrate and activate the station entry.

Transitions. Transitions impacts in the station areas would be similar to those described citywide for the No Action Alternative and Alternatives 2 and 5 and the Preferred Alternative. Under Alternatives 2 and 5 and the Preferred Alternative, development of high-intensity buildings in the immediate vicinity of the 130th station area may create abrupt local transitions in scale between existing detached houses and new larger construction. Over time, an evolution of the station area into more consistently intensely used land, combined with smaller scale redevelopment in surrounding low-rise zones, would likely soften these transitions.

Tree canopy. Numerous evergreens, steep slopes, Thornton Creek, and environmentally critical areas near the 130th Station Area make development here unique, and perhaps more constrained, than many other Seattle areas. Existing large evergreen trees make residential areas feel set in hillside woods. Tree preservation could impact development capacity, and redevelopment with a loss of existing trees would have a noticeable effect on the human experience and sense of being set in nature. Under all alternatives, any redevelopment would

fill gaps in street trees along the frontage. Large-scale redevelopment under Alternatives 2 and 5 and the Preferred Alternative in the station areas (more so under Alternative 5 and the Preferred Alternative) would significantly impact the existing tree canopy.

Shadows. Under all alternatives, the existing tall evergreens, combined with steep slopes, significantly shade many residential areas. Shadow impacts from increases in building heights would be less noticeable in these residential areas because of those existing shadows. The north-south orientation of 15th Ave NE, as well as to a lesser extent the diagonal orientation of Roosevelt Way NE, allows for greater solar access for longer hours throughout the year, even with increases in building heights. Under Alternatives 2 and 5 and the Preferred Alternative, increased height limits could result in increased shadows on Jackson Park. However, the human experience of the park would not significantly change as tall evergreens already shade the park boundaries.

Views. Impacts to public views in the station areas under the No Action Alternative and Alternative 2 would be limited. Increased height limits near the 130th light rail station under Alternatives 2 and 5 and the Preferred Alternative could have limited impacts on the adjacent I-5 scenic corridor.

3.6.3 Mitigation Measures

Incorporated Plan Features

All alternatives would focus most future growth into the existing urban centers and villages. Compatibility challenges would not be an uncommon or new phenomenon in these areas and can be avoided or mitigated by continuing to implement the Land Use Code (Title 23). New place types and/or expanded housing options in existing Neighborhood Residential zones proposed as part of the action alternatives would introduce localized land use and urban form impacts where newer development is of greater height and intensity than existing development. These impacts, if they occur, are likely temporary and will be resolved over time or reduced by the application of existing or new development regulations and design standards. Overall, the new place types would create smoother and more varied transitions in intensity throughout the city (especially adjacent to urban center and village boundaries).

Existing building and land use policies, programs, and codes that promote compact building forms and energy efficient, low-carbon, green building techniques—such as the City's green building permit incentives for private development and the Sustainable Buildings and Sites policy for City-development—would continue to apply under all alternatives as discussed below under **Regulations & Commitments**. See also **Appendix J** which includes a description of proposed zoning code changes.

Under the action alternatives, the City could also update Comprehensive Plan policies to further address the effects of climate change, particularly for communities more vulnerable to the

effects of climate stress than others or located in areas in the city that may experience larger effects from climate change (including "heat islands" with more pavement and fewer trees, floodplain and landslide hazard areas, and areas with limited access to transit). For example, the action alternatives focus additional residential growth in areas 1, 2, and 6 which have relatively high levels of existing tree canopy cover. Required frontage improvements could increase the number of street trees with redevelopment, though more and bulkier development under all alternatives would likely displace some trees on private property and reduce tree canopy coverage overall. Potential mitigation measures to minimize tree canopy loss are described in **Section 3.3 Plants & Animals** and could include shared open space (see **Other Potential Mitigation Measures** below) or adding open space requirements in Neighborhood Residential zones (see also **Section 3.11 Public Services**).

Regulations & Commitments

Seattle's municipal code contains regulations for land use and urban form. Below is a summary of these regulations as well as existing supporting policies and programs which would serve to mitigate impacts associated with the alternatives.

SEPA Policies. Title 25 of the Seattle Municipal Code contains policies governing the issues to be addressed during development review under the State Environmental Policy Act (SEPA). SMC 25.05.675 contains policies related to specific environmental issues, including land use compatibility, noise, height, bulk, and scale, shadows, and views.

Development Regulations. The Seattle Municipal Code contains zoning and development regulations for the city. These development regulations contain provisions governing the design of buildings, site planning, restrictions within the shoreline jurisdiction, and provisions to minimize land use incompatibilities and impacts associated with height, bulk, and scale. Each zone contains unique provisions for urban design such as setbacks, upper-story setbacks, open space requirements, building height, FAR, screening, and landscaping, etc. They also contain standards for landscaping, tree protection, and stormwater which support the retention and planting of trees and vegetation.

Seattle Design Review Program. The Seattle Design Review Program provides oversight of private development projects in Seattle that meet certain criteria in terms of development size or where a departure from a development standard is requested. As discussed above, the City is currently updating its Design Review program to streamline the process and be consistent with HB 1293 (see **Design Review** under **Major Land Use Policy Changes Recently Adopted or Currently Under Consideration**). Design Review Boards are currently designated for eight areas of the city; each board is responsible for reviewing larger development projects in their defined area for compliance with Seattle's adopted Design Guidelines and recommending design changes to make projects more consistent with the guidelines. Smaller projects are currently reviewed administratively. The Design Guidelines define desirable qualities with regard to architecture, urban design, and public space, and the overall goal of the program is to encourage excellence in the design of new commercial and multi-family development in Seattle.

In addition to citywide standards, several sets of neighborhood-specific design guidelines currently supplement the Citywide and Downtown design guidelines.

Design Standards. Projects below the threshold for Design Review are subject to more prescriptive design standard regulations. These regulations are intended to ensure that smaller projects still meet the City's design objectives without imposing a level of delay and uncertainty that might be inappropriate for small projects.

Streets Illustrated, Seattle's Right-of-Way Improvements Manual. Streets Illustrated establishes and documents the policies, procedures, and practices for how the City manages physical improvements in the street right-of-way. It attempts to provide a comprehensive resource for all procedures, standards, and guidelines affecting physical changes in the street right-of-way. The manual also designates streets throughout Seattle for their modal priorities and purpose in their context, provides design guidance and standards to be implemented with redevelopment, and guides street tree selection and provision.

Green Building Incentives. The City's green building incentives aim to create more efficient buildings that center around clean electric energy, water, and resource conservation with a focus on human health. Projects can gain additional height, floor area, or a faster building permit in exchange for meeting specific green building goals and certification. Incentives include:

- *Priority Green Expedited:* Available for all new construction projects. Offers faster building permit review and processing for projects that meet green building requirements with a focus on clean energy, resource conservation, indoor air quality, and lead hazard reduction.
- *Green Building Standard:* Gives additional development capacity in specific zones in exchange for meeting green building requirements.
- *Living Building Pilot Program:* Offers additional height, floor area ratio (FAR), and Design Review departure requests for projects that meet aggressive energy and water requirements and Living Building Petal Certification.
- *2030 Challenge:* Offers additional height, FAR, and Design Review departure requests for projects that meet the 2030 Challenge.
- *Innovation Advisory Committee:* This group of experts reviews energy efficient proposals not covered in the technical codes.

Sustainable Buildings and Sites Policy. The City's Sustainable Buildings and Sites Policy for municipal facilities aims to maximize the environmental quality, economic vitality, and social health of the city through the design, construction, operation, maintenance, renovation, and decommissioning of City-owned buildings and sites. Sustainable buildings and sites support overall City objectives by making efficient use of energy, water, and material resources; reducing climate change; minimizing pollution and hazardous materials; creating healthy indoor environments; reinforcing natural systems; providing habitat; creating vibrant spaces for people; and contributing to Seattle's neighborhoods. The Policy sets the following goals for City-owned properties:

- New construction and major renovations 5,000 ft^2 or greater must meet LEED Gold as well as key performance requirements for energy and water efficiency, waste diversion, and bicycle facilities.
- Tenant Improvements 5,000 ft^2 or greater with a scope of work that includes mechanical, electrical, and plumbing must meet LEED Gold as well as water efficiency and waste diversion requirements.
- Small projects—either new construction, renovations, or tenant improvements—are to utilize Capital GREEN, a green design and construction evaluation tool developed by FAS, in project planning and development.
- All new and existing sites projects shall follow best management practices.

Other Potential Mitigation Measures

Although not required to address identified impacts, the City could pursue the following kinds of actions if it wishes to address possible future land use and urban form conditions.

Urban Form

In addition to the changes to policies and regulations described in **Chapter 2** relevant to urban form (development standards for balconies, roofs, tree protection, ground floor open space, shared open space, reduced residential parking and more), the City could further expand or extend the concepts as follows:

Changes to Development Standards. Changes to development standards such as updated design standards, allowances for porches and balconies, and bonuses for pitched roofs could improve the design of future development and mitigate the impact of new buildings.

Trees on private property. Options for mitigating potential tree loss in Neighborhood residential zones include updating existing requirements for planting trees on private property.

Funding for Trees. Invest in efforts to plant, maintain, and preserve of trees such as:

- Increasing funding to maintain and steward City-owned trees.
- Develop a tree stewardship program to provide expertise to residents on the care and maintenance of their trees.
- Increase stewardship and active management of forested parks through the Green Seattle Partnership.
- Expand partnership approaches to plant and maintain trees on private property like the Trees for Neighborhoods program.
- Plant more trees in the right of way and parks.
- Test technologies like flexible surfaces and expanded tree pits and explore creative uses of the right of way for trees and green infrastructure.

Incentives for Ground Floor Open Space. Allowing additional height (but not FAR) for projects that provide more ground level open space could create more space for trees and make the ground floor environment more open and inviting.

Point access blocks to achieve narrower building footprints. Seattle's building code allows up to 6-story point access block buildings (i.e., each building has just one staircase/elevator core instead of units surrounding a double-loaded corridor) which can support dense housing using narrow floorplates. Raising awareness about this type of housing, as well as allowing more than two per lot, could provide the flexibility for incremental development over time to achieve community needs and urban design goals better and more quickly than traditional processes of parcel assembly and development of large, bulky buildings.

Additionally, tall point access block buildings allow for housing development to have the necessary density to pencil while also allowing for greater unit diversity in the building. This means 3+ bedroom units are more viable to develop and multifamily housing is friendlier to children and families.

New combinations of allowed height, FAR, and setbacks found in Seattle's zoning regulations could lead to denser housing that is taller but still improves wellbeing, livability, and sociability for those living in the housing, while also easing some aesthetic, size, and shade concerns from neighbors. New or adjusted zones that allow 5- to 8-story midrise buildings, while having FARs closer to current low-rise 3- and 4-story buildings, and that relax side and front setbacks, could allow for point access block or single stair buildings.

Accessibility. Potential code changes—such as updates to the City's building code to significantly reduce the size and cost of elevators—would further promote compact building forms, while also increasing accessibility in new housing. See **Appendix J** for more information on proposed legislation.

Shadows

Shadows on street trees. Select future trees and vegetation with future shadow conditions in mind.

Views

Investments to support public viewpoints. Additional funding for viewpoints on public property to draw attention to key viewpoints could help make better use of existing views.

Street trees. Select future trees and vegetation with existing viewpoints in mind.

130th/145th Station Area

- **Urban design and active transportation: Transit celebration**. Incentivize or require development to relate to, enhance, celebrate, and activate the station entry with transit-oriented commercial and public space.

- **Urban design and active transportation: Intersite connectivity.** Incentivize or require new development to provide new paths or streets to break down large blocks and provide direct, short routes to the station.
- **Street-level community building: Lack of focused public realm.** Undertake a community design effort to develop a cohesive approach toward development of public streets, public realm, or opportunities for shared social gathering that could be implemented through a combination of private development and public projects.
- **Street-level community building: Affordable commercial space.** Implement the 130th & 145th Station Area Planning Plan displacement mitigation strategies.
- **Child-friendly city and social wellbeing: Shared open space.** Incentivize or require outdoor gathering spaces, especially children's play areas, that are oriented away from air and noise pollutants. Consider allowing zero-lot line development to allow for incremental development of interlocking buildings that create an active and varied street front—that can also block air and noise—while consolidating privately shared gathering space internally.
- **Sociability: Small social spaces.** Incentivize or require social corridors and/or shared entries amongst a small group of units in residential development to promote trust-building and social connections. Consider allowing more than 2 single-stair buildings per lot to maximize opportunities for shared entries amongst smaller groups of neighbors.

3.6.4 Significant Unavoidable Adverse Impacts

Over time, additional growth and development will occur in Seattle and a generalized increase in development intensity, height, bulk, and scale is expected under all alternatives—this gradual conversion of lower-intensity uses to higher-intensity development patterns is unavoidable but an expected characteristic of urban population and employment growth. No significant unavoidable adverse impacts to land use patterns, compatibility, or urban form are expected under any alternative.

Future growth is likely to result in temporary or localized land use impacts as development occurs. The potential impacts related to these changes may differ in intensity and location in each of the alternatives and many are expected to resolve over time. Application of the City's adopted or new development regulations, zoning requirements, and design guidelines are anticipated to sufficiently mitigate these impacts.

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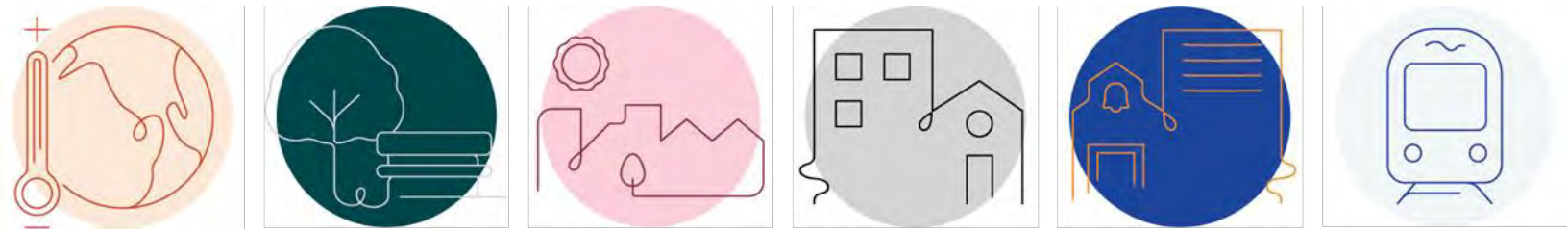
3.7 Relationship to Plans, Policies, & Regulations



Source: City of Seattle, 2023.

The City of Seattle's last periodic update of the Comprehensive Plan was approved in 2016. The One Seattle Comprehensive Plan Update is the next major periodic review to evaluate the Comprehensive Plan for continued consistency with the latest provisions of the State of Washington Growth Management Act (GMA), Puget Sound Regional Council's (PSRC's) VISION 2050, Countywide Panning Policies (CPPs), and the community's vision. This section reviews adopted state, regional, and City plans and policies that guide growth in Seattle and reviews the proposed alternatives for consistency with the adopted plans and policies—an impact is identified if the proposal would result in an inconsistency with adopted plans and policies. Mitigation measures to address identified adverse impacts and a summary of any significant unavoidable adverse impacts follow the description of existing conditions (affected environment) and impacts analysis.

Thresholds of significance utilized in this impact analysis include:

- Inconsistency with adopted plans and policies.

Per WAC 365-196-210, consistency means: *no feature of a plan or regulation is incompatible with any other feature of a plan or regulation. Consistency is indicative of a capacity for orderly integration or operation with other elements in a system*.

3.7.1 Affected Environment

The current policy and regulatory framework regulating land use in Seattle flows from the GMA, PSRC's Multi-County Planning Policies (MPPs) contained in VISION 2050, King County's CPPs, the City's current Comprehensive Plan, and implementation actions including development standards in the Seattle Municipal Code (SMC) and the Shoreline Master Program (SMP). Several other regulatory measures affect land use including localized overlay districts and design guidelines.

State & Regional Framework

Growth Management Act

Comprehensive Plans and development regulations within the City of Seattle must be consistent with the provisions of the Growth Management Act (GMA). The GMA was adopted in 1990 to address concerns about the impacts of uncoordinated growth on Washington communities and the environment and provides a framework for land use planning and development regulations in the state. The GMA directs coordinated regional and countywide planning, which then inform the locally adopted comprehensive plans and development regulations of individual cities and counties. Key provisions of the GMA include:

- Planning Goals
- Land Designations
- Multicounty Planning Policies (MPPs)

- Buildable Lands Program
- Countywide Planning Policies (CPPs)
- Local Comprehensive Planning

The GMA is primarily codified under Chapter 36.70A RCW. In 2021, GMA goals and element requirements regarding housing were amended to require jurisdictions to plan for and accommodate housing that is affordable to all economic segments of the population and to identify and address racially disparate impacts (see **Section 3.8 Population, Housing, & Employment**). The Washington State Department of Commerce (Commerce) published a summary of amendments to the GMA from 1995 through 2022.[28]

Relationship between the GMA, VISION 2050 and MPPs, CPPs, and local comprehensive plans. Source: PSRC, 2022.

The GMA includes 15 planning goals, in no particular order, to help guide the development and adoption of local comprehensive plans and development regulations. The fifteenth goal references goals and policies of the Shoreline Management Act. These goals direct most population and employment growth to be focused in urban areas to avoid sprawl, provide efficient and effective services and infrastructure within adopted levels of service, and protect environmentally critical areas. See **Exhibit 3.7-1**.

Exhibit 3.7-1. GMA Goals

GMA Goal	Text
(1) Urban growth	Encourage development in urban areas where adequate public facilities and services exist or can be provided in an efficient manner.
(2) Reduce sprawl	Reduce the inappropriate conversion of undeveloped land into sprawling, low-density development.
(3) Transportation	Encourage efficient multimodal transportation systems that will reduce greenhouse gas emissions and per capita vehicle miles traveled and are based on regional priorities and coordinated with county and city comprehensive plans.
(4) Housing	Encourage the availability of affordable housing to all economic segments of the population of this state, promote a variety of residential densities and housing types, and encourage preservation of existing housing stock.

[28] Available online at https://www.commerce.wa.gov/about-us/rulemaking/gma-laws-rules/.

GMA Goal	Text
(5) Economic development	Encourage economic development throughout the state that is consistent with adopted comprehensive plans, promote economic opportunity for all citizens of this state, especially for unemployed and for disadvantaged persons, promote the retention and expansion of existing businesses and recruitment of new businesses, recognize regional differences impacting economic development opportunities, and encourage growth in areas experiencing insufficient economic growth, all within the capacities of the state's natural resources, public services, and public facilities.
(6) Property rights	Private property shall not be taken for public use without just compensation having been made. The property rights of landowners shall be protected from arbitrary and discriminatory actions.
(7) Permits	Applications for both state and local government permits should be processed in a timely and fair manner to ensure predictability.
(8) Natural resource industries	Maintain and enhance natural resource-based industries, including productive timber, agricultural, and fisheries industries. Encourage the conservation of productive forestlands and productive agricultural lands and discourage incompatible uses.
(9) Open space and recreation	Retain open space, enhance recreational opportunities, conserve fish and wildlife habitat, increase access to natural resource lands and water, and develop parks and recreation facilities.
(10) Environment	Protect the environment and enhance the state's high quality of life, including air and water quality, and the availability of water.
(11) Citizen participation and coordination	Encourage the involvement of citizens in the planning process, including the participation of vulnerable populations and overburdened communities, and ensure coordination between communities and jurisdictions to reconcile conflicts.
(12) Public facilities and services	Ensure that those public facilities and services necessary to support development shall be adequate to serve the development at the time the development is available for occupancy and use without decreasing current service levels below locally established minimum standards.
(13) Historic preservation	Identify and encourage the preservation of lands, sites, and structures that have historical or archaeological significance.
(14) Climate change and resiliency	~~(14)~~ Ensure that comprehensive plans, development regulations, and regional policies, plans, and strategies … adapt to and mitigate the effects of a changing climate; support reductions in greenhouse gas emissions and per capita vehicle miles traveled; prepare for climate impact scenarios; foster resiliency to climate impacts and natural hazards; protect and enhance environmental, economic, and human health and safety; and advance environmental justice.
(15) Shorelines	For shorelines of the state, the goals and policies of the shoreline management act as set forth in RCW 90.58.020 shall be considered an element of the county's or city's comprehensive plan.

Sources: RCW 36.70A.020 and RCW 36.70A.480 (1), 2023.

Jurisdictions planning under the GMA are required to balance these goals in the development and adoption of their comprehensive plans and development regulations. Counties and cities in most parts of the state—including Central Puget Sound—must prepare comprehensive plans that include objectives, principles, standards, and a future land use map. Required elements of the comprehensive plan include land use, housing, capital facilities plan, utilities, rural (for counties), transportation, economic development, parks and recreation, and climate change and resiliency. Local governments may include other elements if they wish. Development

regulations, such as zoning, must be consistent with the local government's Comprehensive Plan. Counties and cities must be up to date with the requirements of the GMA, including the periodic update requirements, to be eligible for grants and loans from certain state infrastructure programs.

VISION 2050 & Multicounty Planning Policies

Puget Sound Regional Council (PSRC) develops policies and coordinates decisions about regional growth, transportation, and economic development planning within King, Pierce, Snohomish, and Kitsap counties. VISION 2050 is the long-range growth management, environmental, economic, and transportation strategy for the four-county Puget Sound region. It was adopted by PSRC in October 2020 and is endorsed by more than 100 member cities, counties, ports, state and local transportation agencies, and Tribal governments within the region. PSRC reviews local plans for consistency with VISION 2050 and the Regional Transportation Plan.

VISION 2050 includes the GMA required multicounty planning policies (MPPs) for the four counties and a regional strategy for accommodating growth through 2050. The MPPs provide direction for more efficient use of public and private investments and inform updates to countywide planning policies and local comprehensive plan updates. VISION 2050 includes 216 MPPs organized by the topic area goals in **Exhibit 3.7-2**.

Exhibit 3.7-2. VISION 2050 Topic Area Goals

Topic Area	VISION 2050 Goal
Regional Collaboration **15 MPPs**	The region plans collaboratively for a healthy environment, thriving communities, and opportunities for all.
Regional Growth Strategy **16 MPPs**	The region accommodates growth in urban areas, focused in designated centers and near transit stations, to create healthy, equitable, vibrant communities well-served by infrastructure and services. Rural and resource lands continue to be vital parts of the region that retain important cultural, economic, and rural lifestyle opportunities over the long term.
Environment **22 MPPs**	The region cares for the natural environment by protecting and restoring natural systems, conserving habitat, improving water quality, and reducing air pollutants. The health of all residents and the economy is connected to the health of the environment. Planning at all levels considers the impacts of land use, development, and transportation on the ecosystem.
Climate Change **12 MPPs**	The region substantially reduces emissions of greenhouse gases that contribute to climate change in accordance with the goals of the Puget Sound Clean Air Agency (50% below 1990 levels by 2030 and 80% below 1990 levels by 2050) and prepares for climate change impacts.
Development Patterns **54 MPPs**	The region creates healthy, walkable, compact, and equitable transit oriented communities that maintain unique character and local culture, while conserving rural areas and creating and preserving open space and natural areas.
Housing **12 MPPs**	The region preserves, improves, and expands its housing stock to provide a range of affordable, accessible, healthy, and safe housing choices to every resident. The region continues to promote fair and equal access to housing for all people.

Topic Area	VISION 2050 Goal
Economy **23 MPPs**	The region has a prospering and sustainable regional economy by supporting businesses and job creation, investing in all people and their health, sustaining environmental quality, and creating great central places, diverse communities, and high quality of life.
Transportation **32 MPPs**	The region has a sustainable, equitable, affordable, safe, and efficient multimodal transportation system, with specific emphasis on an integrated regional transit network that supports the Regional Growth Strategy and promotes vitality of the economy, environment, and health.
Public Services **30 MPPs**	The region supports development with adequate public facilities and services in a timely, coordinated, efficient, and cost-effective manner that supports local and regional growth planning objectives.

Source: PSRC VISION 2050, 2020.

The regional growth strategy in VISION 2050 calls for focusing new housing, jobs, and development within regional growth centers and near high capacity transit. The strategy also aims to keep rural areas, farmland, and forests healthy and thriving. Regional growth centers have been a central strategy of regional planning for decades, although centers have been designated through different procedures depending on when they were first designated. Seattle's six urban centers and two manufacturing industrial centers (MICs) are also designated PSRC Metro Regional Growth Centers (RGCs) and Employment MICs, respectively, in VISION 2050. See **Exhibit 3.7-3**.

Exhibit 3.7-3. PSRC Regional Growth Centers in Seattle

Center	VISION 2050 Center Designation
Downtown	Regional Growth Center—Metro
First Hill/Capitol Hill	Regional Growth Center—Urban
University District	Regional Growth Center—Urban
South Lake Union	Regional Growth Center—Urban
Uptown	Regional Growth Center—Urban
Northgate	Regional Growth Center—Urban
Ballard-Interbay	Manufacturing Industrial Center—Growth
Duwamish	Manufacturing Industrial Center—Growth

Source: PSRC VISION 2050, 2020.

VISION 2050 includes updated regional geographies and modified classifications for cities and unincorporated urban areas based on size, function, and access to high-capacity transit. The updated regional geographies are:

- Metropolitan Cities
- Core Cities
- High-Capacity Transit (HCT) Communities
- Cities & Towns

- Urban Unincorporated Areas
- Rural
- Resource Lands
- Major Military Installations
- Indian Reservation Lands

The City of Seattle is considered a Metropolitan City, which is a civic, cultural, and economic hub with convenient access to high-capacity transit. Per VISION 2050, Metropolitan Cities (including Seattle) are to take a large share of the four-county growth (36% of population and 44% of jobs). VISION 2050 further encourages these cities to accommodate more growth that improves jobs/housing balances, if possible.

Countywide Planning Policies

The GMA requires counties and cities to collaboratively develop countywide planning policies (CPPs) to set the general framework for coordinated land use and population planning between a county and its cities to ensure comprehensive plans are consistent with each other (RCW 36.70A.210). The role of the CPPs is to coordinate comprehensive plans of jurisdictions in the same county regarding regional issues and issues affecting common borders (RCW 36.70A.100).

The King County CPPs were adopted December 14, 2021, and last amended December 6, 2022, and are consistent with PSRC's MPPs and Regional Growth Strategy. The CPPs aim to promote sustainable and equitable growth, protect the environment, and enhance the quality of life for residents. Key topics covered by the CPPs include urban centers, housing, transportation, public facilities, and economic development. The policies encourage compact and coordinated land use patterns, with a focus on preserving open spaces and natural areas. They also promote the use of public transportation and encourage the development of walkable communities.

The CPPs aim to increase the availability of affordable housing for all residents, with a focus on providing housing for low- and moderate-income households. The policies encourage the development of diverse housing options that are accessible to a range of household types, including single-family homes and apartments, as well as middle housing such as townhouses, duplexes, and accessory dwelling units (ADUs). The CPPs' economic vision emphasizes providing opportunities for everyone, including BIPOC[29]-, immigrant-, and women-owned businesses.

The CPPs also set housing and job growth targets for each jurisdiction within the county for the planning period between 2019 and 2044. Other policies related to expanding housing options and neighborhood choice, however, may result in cities needing to increase capacity further to encourage a variety of housing typologies. Seattle's minimum growth targets as set in the CPPs are for 112,000 new housing units and 169,500 new jobs between 2019 and 2044.[30] The City of Seattle has adjusted the growth targets to a 20 year time frame by accounting for constructed

[29] Black, indigenous, persons of color
[30] See Table DP-1 on page 23 of the King County CPPs.

growth in recent years and prorating growth in future years. In spring 2023, a set of amendments to housing affordability targets was developed. For Seattle the units and emergency beds are shared in **Exhibit 3.7-4**. **Section 3.8 Population, Housing, & Employment** provides a discussion of affordable housing.

Exhibit 3.7-4. Net New Housing Units and Emergency Housing Needed, 2019-2044

Total Housing Need	0 To ≤30%		>30 To ≤50%	>50 To ≤80%	>80 To ≤100%	>100 To ≤120%	>120%	Emergency Housing
	Non-PSH	PSH						Beds
112,000	28,572	15,024	19,144	7,986	5,422	6,150	29,702	21,401

Legend: PSH = permanent supportive housing
Source: King County, 2023.

Appendix 6 of the CPPs also includes designation criteria for countywide growth centers. Countywide growth centers are intended to serve important roles as places for equitably concentrating jobs, housing, shopping, and recreational opportunities. These are often smaller downtowns, high-capacity transit station areas, or neighborhood centers that are linked by transit. Countywide growth centers provide a mix of housing and services and serve as focal points for local and county investment. The criteria include an existing density of at least 18 activity units and planned density of at least 30 activity units. Countywide growth centers are also expected to be between 160–500 acres in size, include frequent all-day transit service, and demonstrate evidence of the center's regional or countywide role and future market potential to support the planned densities. No countywide growth centers are formally designated in King County although several have received preliminary approval. See **Section 3.6 Land Use Patterns & Urban Form** for additional analysis of Seattle's existing and proposed urban villages in relation to the activity unit and size designation criteria.

Exhibit 3.7-5. King County Countywide Planning Policies

Chapter/Element	Vision/Goals
Vision for King County 2050	It is the year 2050 and our county has changed significantly in the roughly 60 years that have elapsed since the first Countywide Planning Policies were adopted in 1992. In 2050, ▪ Communities across King County are welcoming places where every person can thrive. ▪ All residents have access to opportunity and displacement from development is lessened. ▪ The cities are vibrant and inviting hubs for people with a safe, affordable, and efficient transportation system that connects people to the places they want to go. ▪ Housing is characterized by a full range of options that are healthy, safe, affordable, and open to all. ▪ The county's critical areas are protected and have been restored. ▪ Open spaces are well distributed and inviting to all users. ▪ The Rural Area is viable and permanently protected with a clear boundary between urban and rural areas. ▪ The county boasts of bountiful agricultural areas and productive forest lands. ▪ The economy provides opportunities to everyone and includes Black, Indigenous, and other People of Color-owned businesses; immigrant- and women-owned businesses; locally owned businesses; and global corporations.

Chapter/Element	Vision/Goals
Environment	Overarching Goal: The quality of the natural environment in King County is restored and protected for future generations.
Development Patterns	Overarching Goal: Growth in King County occurs in a compact, centers-focused pattern that uses land and infrastructure efficiently, connects people to opportunity, and protects Rural and Natural Resource Lands.
Housing	Overarching Goal: Provide a full range of affordable, accessible, healthy, and safe housing choices to every resident in King County. All jurisdictions work to: ▪ preserve, improve, and expand their housing stock; ▪ promote fair and equitable access to housing for all people; and ▪ take actions that eliminate race-, place-, ability-, and income-based housing disparities.
Economy	Overarching Goal: All people throughout King County have opportunities to prosper and enjoy a high quality of life through economic growth and job creation.
Transportation	Overarching Goal: The region is well served by an integrated, multimodal transportation system that supports the regional vision for growth, efficiently moves people and goods, and is environmentally and functionally sustainable over the long term.
Public Facilities and Services	Overarching Goal: County residents in both Urban and Rural Areas have timely and equitable access to the public services needed to advance public health and safety, protect the environment, and carry out the Regional Growth Strategy.

Source: BERK Consulting, Inc.

Local Framework

Seattle's Existing Comprehensive Plan

Seattle's current Comprehensive Plan, *Seattle 2035*, is a 20-year vision and roadmap for Seattle's future. The plan guides City decisions on where to build new jobs and houses, how to improve the transportation system, and where to make capital investments such as utilities, sidewalks, and libraries. Seattle 2035 is the framework for most of Seattle's big-picture decisions on how to grow while preserving and improving the city's neighborhoods.

The Comprehensive Plan was first adopted in 1994 consistent with the GMA. Less extensive revisions and updates are incorporated on an annual basis and major "periodic reviews" were completed in 2004 and 2016. The current plan was last amended in 2022.

The One Seattle Comprehensive Plan Update is the next major periodic review.

Volume 1 of the Comprehensive Plan 2035 consists of fourteen major elements—all of these will be reviewed and updated as part of the proposal:

1. Growth Strategy Element
2. Land Use Element
3. Transportation Element
4. Housing Element
5. Capital Facilities Element
6. Utilities Element

7. Economic Development Element
8. Environment Element
9. Parks and Open Space Element
10. Arts and Culture Element
11. Community Well-Being Element
12. Community Engagement Element
13. Container Port Element
14. Shoreline Element

The four core values of Seattle's Comprehensive Plan are:

- **Race and Social Equity**—limited resources and opportunities must be shared; and the inclusion of under-represented communities in decision-making processes is necessary.
- **Environmental Stewardship**—protect and improve the quality of our global and local natural environment.
- **Community**—developing strong connections between a diverse range of people and places.
- **Economic Opportunity and Security**—a strong economy and a pathway to employment is fundamental to maintaining our quality of life.

Volume 2 of the Comprehensive Plan consists of the City's 38 adopted neighborhood plans.

Urban Villages Strategy & Distribution of Growth

The urban village strategy is the foundation of Seattle's Comprehensive Plan. It is the City's unique approach to meeting the state GMA requirement and is similar to VISION 2050's growth centers approach. This strategy encourages most of the city's expected future growth to occur in specific areas that are best able to absorb and capitalize on that growth. The City has designated four types of areas (represented in Alternative 1, No Action)[31], each of which has a different function and character with varying amounts and intensity of growth and mixes of land uses:

1. **Urban centers** are the densest Seattle neighborhoods. They act as both regional centers and local neighborhoods that offer a diverse mix of uses, housing, and employment opportunities.
2. **Hub urban villages** are communities that offer a balance of housing and employment but are generally less dense than urban centers. These areas provide a mix of goods, services, and employment for their residents and surrounding neighborhoods.
3. **Residential urban villages** are areas of residential development, generally at lower densities than urban centers or hub urban villages. While they are also sources of goods and

[31] See **Exhibit 2.1-1** in **Chapter 2** for a cross-walk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~A~~lternatives ~~2-5~~. Alternative 1 No Action would retain the City's Seattle 2035 urban village strategy and center/village designations—the existing urban centers and villages are categorized here according to the new place types proposed under Alternatives 2-5 for comparison purposes only. Ballard would remain a "Hub Urban Village" under Alternative 1, would be called an "Urban Center" under Alternatives 2-5, and would be redesignated as a Regional Center (as shown here) under Alternative 5.

services for residents and surrounding communities, for the most part they do not offer many employment opportunities.

4. **Manufacturing/industrial centers (MICs)** are home to the city's thriving industrial businesses. Like urban centers, they are important regional resources for retaining and attracting jobs and for maintaining a diversified economy.

The urban village strategy is designed to support the Comprehensive Plan's core values by directing growth to existing urban centers and villages, contributing to the vibrancy of neighborhood centers, and reinforcing the benefits of City investments in transit, parks, utilities, community centers, and other infrastructures.

Land Use Element

The Land Use Element includes goals and policies guiding the physical form and activities allowed in the city. The goals address the City's urban village strategy, housing densities, mixed-use areas, commercial and industrial areas, historic preservation, and critical areas. See **Exhibit 3.7-6**.

Exhibit 3.7-6. Seattle 2035 Land Use Element Goals

Goal	Text
LU G1	Achieve a development pattern consistent with the urban village strategy, concentrating most new housing and employment in urban centers and villages, while also allowing some infill development compatible with the established context in areas outside centers and villages.
LU G2	Provide zoning and accompanying land use regulations that • allow a variety of housing types to accommodate housing choices for households of all types and income levels; • support a wide diversity of employment-generating activities to provide jobs for a diverse residential population, as well as a variety of services for residents and businesses; and • accommodate the full range of public services, institutions, and amenities needed to support a racially and economically diverse, sustainable urban community.
LU G3	Allow public facilities and small institutions to locate where they are generally compatible with the function, character, and scale of an area, even if some deviation from certain regulations is necessary.
LU G4	Provide opportunities for locating radio and television broadcast utilities (major communications utilities) to support continued and improved service to the public and to address potential impacts to public health.
LU G5	Establish development standards that guide building design to serve each zone's function and produce the scale and character desired, while addressing public health, safety, and welfare.
LU G6	Regulate off-street parking to address parking demand in ways that reduce reliance on automobiles, improve public health and safety, reduce greenhouse gas emissions, lower construction costs to reduce the cost of housing and increase affordable housing, create attractive and walkable environments, and promote economic development throughout the city.
LU G7	Provide opportunities for detached single-family and other compatible housing options that have low height, bulk, and scale in order to serve a broad array of households and incomes and to maintain an intensity of development that is appropriate for areas with limited access to services, infrastructure constraints, fragile environmental conditions, or that are otherwise not conducive to more intensive development.
LU G8	Allow a variety of housing types and densities that is suitable for a broad array of households and income levels, and that promotes walking and transit use near employment concentrations, residential services, and amenities.
LU G9	Create and maintain successful commercial/mixed-use areas that provide a focus for the surrounding neighborhood and that encourage new businesses, provide stability and expansion opportunities for existing

Goal	Text
	businesses, and promote neighborhood vitality, while also accommodating residential development in livable environments.
LU G10	Provide sufficient land with the necessary characteristics to allow industrial activity to thrive in Seattle and protect the preferred industrial function of these areas from activities that could disrupt or displace them.
LU G11	Promote Downtown Seattle as an urban center with the densest mix of residential and commercial development in the region, with a vital and attractive environment that supports employment and residential activities and is inviting to visitors.
LU G12	Provide flexibility in standard zone provisions or supplement those provisions to achieve special public purposes in areas where unique conditions exist, such as shorelines, historic and special review districts, and major institutions.
LU G13	Encourage the benefits that major institutions offer the city and the region, including health care, educational services, and significant employment opportunities, while mitigating the adverse impacts associated with their development and geographic expansion.
LU G14	Maintain the city's cultural identity and heritage.
LU G15	Promote the economic opportunities and benefits of historic preservation.
LU G16	Promote the environmental benefits of preserving and adaptively reusing historic buildings.
LU G17	Maintain a regulatory system that aims to • protect the ecological functions and values of wetlands and fish and wildlife conservation areas; • prevent erosion on steep slopes; • protect public health, safety, and welfare in areas subject to landslides, liquefaction, floods, or peat settlement, while permitting reasonable development; • protect the public by identifying seismic and volcanic hazard areas; and • avoid development that causes physical harm to people, property, public resources, or the environment.

Source: Seattle 2035, 2022.

Policies underneath the goals provide direction on how these goals should be implemented.

The Land Use Element also includes a Future Land Use Map with several designations (illustrated in Alternative 1, No Action in **Chapter 2**).[32]

- Urban Center
- Hub Urban Village
- Residential Urban Village
- Manufacturing / Industrial Center
- Neighborhood Residential Areas
- Multi-Family Residential Areas
- Commercial / Mixed Use Areas
- Industrial Areas
- Major Institutions
- Cemetery
- City-Owned Open Space

[32] See **Exhibit 2.1-1** in **Chapter 2** for a cross-walk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~A~~lternatives ~~2-5~~. Alternative 1 No Action would retain the City's Seattle 2035 urban village strategy and center/village designations—the existing urban centers and villages are categorized here according to the new place types proposed under Alternatives 2-5 for comparison purposes only. Ballard would remain a "Hub Urban Village" under Alternative 1, would be called an "Urban Center" under Alternatives 2-5, and would be redesignated as a Regional Center (as shown here) under Alternative 5.

Capital Facilities Element & Capital Improvement Program

The City includes a Capital Facilities Element with goals that are carried forward with specific projects and matching revenues in a Capital Improvement Program:

- CF G1 Develop and manage capital facilities to provide long-term environmental, economic, social, and health benefits for all residents and communities when using public investments, land, and facilities.
- CF G2 Reduce ongoing resource consumption and day-to-day costs of the City's capital facilities, and protect their long-term viability, while serving the needs of the people who use them.
- CF G3 Locate capital facilities to achieve efficient citywide delivery of services, support an equitable distribution of services, minimize environmental impacts, and maximize facilities' value to the communities in which they are located.
- CF G4 Design and construct capital facilities so that they are considered assets to their communities and act as models of environmental, economic, and social stewardship.
- CF G5 Make efficient use of resources when investing in facilities and service delivery that involve other agencies and organizations.

Annually the City adopts a capital improvement program addressing a six-year period and includes major repair and replacement and capacity projects addressing growth. The current one is 2023-2028. It addresses improvements towards:

- Culture & Recreation: Parks and Recreation, Seattle Center, The Seattle Public Library
- Transportation
- Seattle City Light
- Seattle Public Utilities: Drainage & Wastewater, Solid Waste, Water, Technology Projects
- Administration: Finance and Administrative Services, Information Technology

Comprehensive Plan Racial Equity Analysis

The City, in collaboration with the organization PolicyLink, developed an equity evaluation of the 2035 Comprehensive Plan based on a Community Engagement Report using targeted conversations and a Racial Equity Analysis Findings and Recommendations. The review identified persistent racial disparities in Seattle related to:

- Housing affordability, choice, and ownership
- Access to neighborhoods of opportunity (incl. parks, schools, healthy environment)
- Housing insecurity and displacement risk
- Access to Seattle's economic prosperity

PolicyLink identified the following recommendations for Comprehensive Plan update:

- **Growth strategy:** Allow more housing types across the city with equitable access to wealth building and neighborhood opportunities.

- **Affordable housing:** Support tools to increase supply of affordable housing with community control and long-term affordability.
- **Displacement:** More and stronger anti-displacement policies and tools, including preservation of cultural communities.
- **Inclusive economy:** Data-informed tools to promote equitable economic opportunity, e.g., training and hiring preferences.
- **Community engagement:** Provide financial/technical support for sustained BIPOC involvement around comp plan update.

130th/145th Station Area Plan

The *130th and 145th Station Area Plan*, adopted in July 2022, outlines the community and City's concepts for land use, mobility and other policies and investments to support a regional vision for integrating fast and reliable transit with compact walkable communities. The Plan is intended to guide decisions for public and private investment near these high-capacity transit stations. Topics addressed in the plan include land use, mobility, housing, open space, and other community needs. Goals, strategies, and early actions included in the Plan are guided by the following vision:

> *The 130th and 145th Station Area is a lively, walkable and welcoming North Seattle neighborhood. Major streets have roomy, tree-lined sidewalks, and other green infrastructure. Bicycle infrastructure makes everyday trips to transit stations, schools and neighboring urban villages enjoyable and safe. An array of housing offers options affordable to a broad range of incomes and lifestyles. Small shops and cafes near the station cater to locals, commuters, students and visitors. Local and citywide lovers of nature, recreation and culture treasure the abundant greenspaces and unique cultural events so easily reached by walking, biking or transit.*

The station area in the *130th and 145th Station Area Plan* includes the area within ½ mile (about a 10-minute walk) of the 130th and 145th Link stations, and within ¼ mile (about a 5-minute walk) of the 145th/15th Ave Stride bus rapid transit (BRT) station. The Plan also considers a larger study area that includes communities that can access the stations by a longer walk or a short bike or bus ride.

3.7.2 Impacts

Impacts Common to All Alternatives

Growth Management Act

Seattle adopted its Comprehensive Plan complying with the GMA in 1994 and it has been amended periodically since that time. The plan contains the elements required by the GMA and the City has adopted land use and environment regulations (Title 23 and Title 25 in the SMC) that implement the plan.

The action alternatives would each adopt a new growth strategy and each element of the Comprehensive Plan would be updated. The plan would continue to focus growth in an urban area with a range of public services and multimodal transportation options, provide for parks and recreation, and protect critical areas and historic resources consistent with the GMA.

The ~~Draft~~ Final EIS alternatives each accommodate the 2044 growth targets and examine different ways the City could distribute its 2044 forecast growth with varying degrees of concentration. Focusing growth within urban areas in this manner is consistent with GMA policies that seek to prevent sprawl and preserve rural areas and resource lands. All alternatives have sufficient zoned vacant and redevelopable land to accommodate the minimum 20-year population, housing, and job allocations. See **Exhibit 3.7-7**.

Exhibit 3.7-7. Growth Management Act Goals—Alternative Evaluations

GMA Goal	Discussion
(1) Urban growth	Each studied alternative would serve growth with city or municipal services.
(2) Reduce sprawl	Each studied alternative would focus on redevelopment in an urban environment.
(3) Transportation	Each studied alternative would place most growth in centers and around transit investments. Alternatives 2 and 5 and the Preferred Alternative support a station area plan at 130th and 145th Street Station Areas. Alternatives 4 and 5 and the Preferred Alternative further emphasize a range of housing types along corridors.
(4) Housing	All alternatives accommodate housing growth targets and Alternatives 3-5 and the Preferred Alternative add more emphasis on middle housing and other housing types. See also **Section 3.8 Population, Housing, & Employment** for a discussion of how the alternatives impact housing and address new GMA housing requirements in HB 1220.
(5) Economic development	All alternatives accommodate job targets. Most jobs would be located in Area 4 Downtown under all alternatives and the action alternatives spread a slightly higher share of retail/service jobs in neighborhoods in support of greater residents.
(6) Property rights	All alternatives support a reasonable use of property.
(7) Permits	All alternatives would implement City policies promoting fair permitting. Alternatives 2 and 5 and the Preferred Alternative could include a planned action or other facilitated environmental review process for the 130th and 145th Station Areas.
(8) Natural resource industries	There are no designated resource lands in the city limits. Alternatives 2-5 and the Preferred Alternative would concentrate more housing growth in balance with jobs,

GMA Goal	Discussion
	which could help reduce the potential regionally for low-density development outside of the city and other urban areas.
(9) Open space and recreation	All alternatives create a demand for parks and recreation under adopted levels of service. The updated Parks, Recreation, and Open Space Plan ~~Comprehensive Plan could~~ includes an updated level of service standard. See **Section 3.11 Public Services**.
(10) Environment	All alternatives would add redevelopment that could implement improved water quality; see **Section 3.1 Earth & Water Quality**. The potential for tree canopy loss or gain is addressed in **Section 3.3 Plants & Animals**.
(11) Citizen participation and coordination	Alternative 1 No Action was based on an engagement process and annual docket evaluation that involved the public in the last periodic review. Relevant to the action alternatives, the One Seattle public participation plan outlines how the City intends to engage community members in the plan update. See the Summary of the scoping process for this EIS in **Chapter 2 Proposal & Alternatives**.
(12) Public facilities and services	All alternatives would allow for growth that increases demand for public services with Alternative 1 the least and Alternative 5 and the Preferred Alternative the most. The City and municipal providers regularly plan for capital facilities to meet current and projected needs. See **Section 3.11 Public Services** and **Section 3.12 Utilities**.
(13) Historic preservation	Each alternative could result in redevelopment that has the potential to alter eligible historic resources or result in ground disturbing activities that could affect cultural resources. See the evaluation and mitigation measures in **Section 3.9 Cultural Resources**.
(14) Climate change and resiliency	Action alternatives include a new Environment and Climate element to advance GHG reduction and climate adaptation measures. The No Action Alternative would continue existing city plans and programs meant to address climate change but were not designed to meet the new HB 1181 requirements in full.
(15) Shorelines	The City maintains a shoreline master program under the Shoreline Management Act. It is updated periodically under a different timeline. The City must be consistent with the shoreline goals of environmental conservation, public access, and shoreline-oriented uses.

Source: BERK, 2023.

VISION 2050 & Multicounty Planning Policies

VISION 2050 policies and alternatives' consistency are evaluated in **Exhibit 3.7-8**. Highlights are described below.

VISION 2050 Regional Growth Strategy, Development Pattern, and Housing Policies: The action alternatives would update the Comprehensive Plan to meet VISION 2050 policies. The No Action Alternative would not update the Comprehensive Plan policies, though the growth capacity would still meet minimum growth targets expected of a Metropolitan city. The action alternatives provide for more growth and could add capacity to meet additional policies and objectives in VISION 2050 including improved balance of jobs and housing, creating opportunities for middle housing, focusing more growth around transit investments, and contributing to a pattern of growth that supports regional climate goals. See **Section 3.8 Population, Housing, & Employment** for a discussion of how the alternatives impact housing and address new GMA housing requirements in HB 1220.

VISION 2050 Climate Policies: All studied alternatives would increase greenhouse gas emissions associated with buildings and waste. The growth levels of Alternatives 2 through 4 combined with anticipated reductions in fuel emissions would reduce transportation emissions. Alternative 5 would slightly increase transportation emissions. The region-wide benefit of channeling development that might otherwise occur in peripheral areas of the city or region to targeted areas could serve to offset these impacts. Additionally, all alternatives appear to result in lower GHG emissions on a per capita basis compared to existing conditions, and action alternatives would have lower per capita rates compared to the No Action Alternative. See **Section 3.2 Air Quality & GHG Emissions**.

VISION 2050 Environment Policies: All alternatives would result in redevelopment that could improve water quality but depending on design could remove tree canopy. Mitigation measures in **Section 3.1 Earth & Water Quality** and **Section 3.3 Plants & Animals** could reduce such impacts. Growth in Seattle that is more balanced between housing and jobs could be beneficial for overall growth patterns in the region and reduce development pressures in other non-urban areas.

VISION 2050 Public Services Policies: All alternatives would increase the demand for public services and utilities, requiring capital facility planning. The No Action Alternative would increase the demand the least and Alternative 5 the most. See **Section 3.11 Public Services** and **Section 3.12 Utilities**.

Exhibit 3.7-8. VISION 2050—Alternatives Evaluation

Topic Area	VISION 2050 Goal	Evaluation
Regional Collaboration **15 MPPs**	The region plans collaboratively for a healthy environment, thriving communities, and opportunities for all.	All alternatives would plan for growth that meets countywide planning policies, which helps promote consistency with other jurisdictions. All alternatives address growth focused on high-capacity transit and centers. This is further emphasized citywide under Alternatives 4 and 5 and the Preferred Alternative around corridors and the redesignated Ballard Regional Center under Alternative 5 and the Preferred Alternative, as well as the urban center in Alternatives 2 and 5 and the Preferred Alternative for the 130th and 145th Street Station Areas. *MPP-RC-8 Direct subregional funding, especially county-level and local funds, to countywide centers, high-capacity transit areas with a station area plan, and other local centers. County-level and local funding are also appropriate to prioritize to regional centers.*
Regional Growth Strategy **16 MPPs**	The region accommodates growth in urban areas, focused in designated centers and near transit stations, to create healthy, equitable, vibrant communities well-served by infrastructure and services.	All alternatives meet MPP-RGS-9 to focus growth in regional growth centers and meet minimum housing growth targets. The action alternatives increase housing growth above minimum growth targets to better balance jobs and housing and to

Topic Area	VISION 2050 Goal	Evaluation
	Rural and resource lands continue to be vital parts of the region that retain important cultural, economic, and rural lifestyle opportunities over the long term.	provide for middle housing as well as focus growth around high-capacity transit, especially Alternatives 4 and 5 and the Preferred Alternative. This is consistent with MPP-RGS-7 that suggests greater housing in Metropolitan Cities like Seattle and MPP-RGS-12 that shows a priority of growth around high-capacity transit. *MPP-RGS-7 Provide additional housing capacity in Metropolitan Cities in response to rapid employment growth, particularly through increased zoning for middle density housing. Metropolitan Cities must review housing needs and existing density in response to evidence of high displacement risk and/or rapid increase in employment.* *MPP-RGS-9 Focus a significant share of population and employment growth in designated regional growth centers.* *MPP-RGS-12 Avoid increasing development capacity inconsistent with the Regional Growth Strategy in regional geographies not served by high-capacity transit.*
Environment **22 MPPs**	The region cares for the natural environment by protecting and restoring natural systems, conserving habitat, improving water quality, and reducing air pollutants. The health of all residents and the economy is connected to the health of the environment. Planning at all levels considers the impacts of land use, development, and transportation on the ecosystem.	All alternatives would add redevelopment that could implement improved water quality; see **Section 3.1 Earth & Water Quality**. The potential for tree canopy loss or gain is addressed in **Section 3.3 Plants & Animals**.
Climate Change **12 MPPs**	The region substantially reduces emissions of greenhouse gases that contribute to climate change in accordance with the goals of the Puget Sound Clean Air Agency (50% below 1990 levels by 2030 and 80% below 1990 levels by 2050) and prepares for climate change impacts.	Growth could increase emissions such as in buildings and waste sources; transportation emissions would decrease for all alternatives except Alternative 5 and the Preferred Alternative. Overall, the No Action Alternative would decrease per capita greenhouse gas emissions and the action alternatives would smaller rates of per capita emissions than the No Action Alternative. See **Section 3.2 Air Quality & GHG Emissions**.
Development Patterns **54 MPPs**	The region creates healthy, walkable, compact, and equitable transit oriented communities that maintain unique character and local culture, while conserving rural areas and creating and preserving open space and natural areas.	All alternatives would focus growth in centers and near transit investments, especially Alternatives 4 and 5 and the Preferred Alternative. There are no designated resource lands in the city limits. The action a~~A~~lternatives ~~2–5~~ would concentrate more housing growth in balance with jobs, which could help the region to reduce the potential for low-density development outside of urban areas.

Topic Area	VISION 2050 Goal	Evaluation
Housing **12 MPPs**	The region preserves, improves, and expands its housing stock to provide a range of affordable, accessible, healthy, and safe housing choices to every resident. The region continues to promote fair and equal access to housing for all people.	All alternatives meet total housing growth targets and the action aAlternatives ~~2-5~~ add more emphasis on middle housing and other housing types, particularly Alternatives 3-5 and the Preferred Alternative. See also **Section 3.8 Population, Housing, & Employment** for a discussion of how the alternatives impact housing and address new GMA housing requirements in HB 1220. *MPP-H-1 Plan for housing supply, forms, and densities to meet the region's current and projected needs consistent with the Regional Growth Strategy and to make significant progress towards jobs/housing balance.*
Economy **23 MPPs**	The region has a prospering and sustainable regional economy by supporting businesses and job creation, investing in all people and their health, sustaining environmental quality, and creating great central places, diverse communities, and high quality of life.	All alternatives accommodate job targets. Most jobs would be located in Area 4 Downtown. The action alternatives spread a slightly higher share of retail/service jobs in neighborhoods in support of greater residents.
Transportation **32 MPPs**	The region has a sustainable, equitable, affordable, safe, and efficient multimodal transportation system, with specific emphasis on an integrated regional transit network that supports the Regional Growth Strategy and promotes vitality of the economy, environment, and health.	Each studied alternative would place most growth in centers and around transit investments. Alternatives 2 and 5 and the Preferred Alternative support a station area plan at 130th and 145th Street areas. Alternatives 4 and 5 and the Preferred Alternative further emphasize a range of housing types along corridors. Transportation improvements would be multimodal. More investments would be needed with greater growth. See **Section 3.10 Transportation**.
Public Services **30 MPPs**	The region supports development with adequate public facilities and services in a timely, coordinated, efficient, and cost-effective manner that supports local and regional growth planning objectives.	All alternatives would allow for growth that increases demand for public services with Alternative 1 the least and Alternative 5 and the Preferred Alternative the most. The City and municipal providers regularly plan for capital facilities to meet current and projected needs. See **Section 3.11 Public Services** and **Section 3.12 Utilities**.

Source: BERK, 2023.

Countywide Planning Policies

Each alternative would provide capacity to meet minimum growth targets for housing and jobs. See **Exhibit 3.7-9**. The ability to produce housing at affordability levels is described in **Section 3.8 Population, Housing, & Employment**. The ~~County~~ City would also meet minimum

standards for the countywide center of 130th Avenue Station Area by total area and activity units under Alternatives 2 and 5 and the Preferred Alternative.

Exhibit 3.7-9. Countywide Planning Policies, Major Goals—Alternatives Evaluation

Chapter/ Element	Goals	Evaluation
Environment	Overarching Goal: The quality of the natural environment in King County is restored and protected for future generations.	All alternatives would add redevelopment that could implement improved water quality; see **Section 3.1 Earth & Water Quality**. The potential for tree canopy loss or gain is addressed in **Section 3.3 Plants & Animals**.
Development Patterns	Overarching Goal: Growth in King County occurs in a compact, centers-focused pattern that uses land and infrastructure efficiently, connects people to opportunity, and protects Rural and Natural Resource Lands.	In general, all alternatives[33] would focus the majority of future growth into urban centers and villages. An additional 80,000 housing units would be added consistent with past growth and existing plan goals which would occur primarily in existing urban centers and villages under all alternatives. The additional 20,000 or 40,000 housing units added under the action alternatives would be accommodated within new place types or expanded urban center and village boundaries located throughout the city depending on the alternative.
Housing	Overarching Goal: Provide a full range of affordable, accessible, healthy, and safe housing choices to every resident in King County. All jurisdictions work to: ▪ preserve, improve, and expand their housing stock; ▪ promote fair and equitable access to housing for all people; and ▪ take actions that eliminate race-, place-, ability-, and income-based housing disparities.	The Countywide Planning Policies include housing targets by affordability bands. ▪ 0-30% Area Median Income (AMI): 6% ▪ 31-50% AMI:10% ▪ 51-80% AMI: 17% ▪ Over 80% AMI: 66% All alternatives meet total housing growth targets. Considering the match of unit types to income bands, action alternatives perform better particularly Alternatives 5 and the Preferred Alternative with the greatest opportunity to provide a range of housing types at different income levels. Please see **Section 3.8 Population, Housing, & Employment** for a discussion of how the alternatives impact housing.
Economy	Overarching Goal: All people throughout King County have opportunities to prosper and enjoy a high quality of life through economic growth and job creation.	All alternatives would accommodate job targets and would promote economic opportunity in the city and region. Most jobs would be located in Area 4 Downtown and the action alternatives spread a slightly higher share of retail/service jobs in neighborhoods in support of greater residents. The action alternatives would include additional policies related to workforce development, supporting and growing neighborhood commercial districts, sustaining a healthy climate for growing and emerging industries, and supporting the city's competitive advantage in the industrial and maritime sectors. The action alternatives

[33] See **Exhibit 2.1-1** in **Chapter 2** for a cross-walk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~A~~lternatives ~~2-5~~. Alternative 1 No Action would retain the City's Seattle 2035 urban village strategy and center/village designations. Ballard would remain a "Hub Urban Village" under Alternative 1, would be called an "Urban Center" under Alternatives 2-5, and would be redesignated as a Regional Center under Alternative 5.

Chapter/ Element	Goals	Evaluation
		would also incorporate policies to ensure equitable access to living-wage careers for all residents, and particularly BIPOC communities to be able to share equally in the benefits of Seattle's growing economy.
Transportation	Overarching Goal: The region is well served by an integrated, multimodal transportation system that supports the regional vision for growth, efficiently moves people and goods, and is environmentally and functionally sustainable over the long term.	Each studied alternative would place most growth in centers and around transit investments. Alternatives 2 and 5 and the Preferred Alternative support a station area plan at 130th and 145th Street areas. Alternatives 4 and 5 and the Preferred Alternative further emphasize a range of housing types along corridors. Transportation improvements would be multimodal. More investments would be needed with greater growth. See **Section 3.10 Transportation**.
Public Facilities and Services	Overarching Goal: County residents in both Urban and Rural Areas have timely and equitable access to the public services needed to advance public health and safety, protect the environment, and carry out the Regional Growth Strategy.	All alternatives would allow for growth that increase demand for public services with the least amount of growth and new demand under the No Action Alternative and the most under Alternative 5 and the Preferred Alternative. The City and municipal providers regularly plan for capital facilities to meet current and projected needs. See **Section 3.11 Public Services** and **Section 3.12 Utilities**.

Source: BERK, 2023.

130th/145th Station Area

Each alternative differs in its treatment of the 130th/145th Station Area Plan. See the discussions below.

Equity & Climate Vulnerability Considerations

The action alternatives would adopt a new Comprehensive Plan with a new growth strategy and new Housing Element incorporates the newest requirements to address racially disparate impacts in housing and provide opportunities for housing under a range of income categories per HB1220. The growth strategies under the alternatives would respond to HB1220 requirements as well as PolicyLink recommendations to allow "more housing types across the city with equitable access to wealth building and neighborhood opportunities."

The action alternatives allocate a similar or greater amount of growth to villages as the No Action Alternative. Additional growth over the No Action Alternative is planned in Neighborhood Residential areas and is either clustered (in neighborhood centers under Alternative 2 or in corridors under Alternative 4) or distributed across single family areas with middle housing types (Alternatives 3 and 5 and the Preferred Alternative).

In addition, the action alternatives include new climate policies focused on reducing emissions from buildings and transportation and making the city more capable of withstanding the impacts of climate change. The action alternatives would allow more growth and could increase

emissions locally per **Section 3.2 Air Quality & GHG Emissions**; however, the region-wide benefit of channeling development that might otherwise occur in peripheral areas of the city or region to targeted areas could serve to offset these impacts.

Long-range policies are meant to bring Seattle closer to being carbon neutral by 2050 and help to build a city that adapts and is resilient to rising seas, heat waves, flooding, and more extreme storms. Seattle is committed to working with partners to reach county, regional, and statewide goals (City of Seattle, 2022).

Impacts of Alternative 1: No Action

Alternative 1, No Action, would meet GMA goals regarding compact growth served by multimodal transportation and municipal services. It would not meet new GMA requirements to amend the Housing Element to address new requirements in HB1220 regarding housing opportunities by income band and the removal of racially disparate impacts. Likewise, new housing targets by income band and special needs housing required in Countywide Planning Policies would not be met. Alternative 1 could perhaps conflict with Countywide Planning Policies that direct cities to provide a full range of affordable, accessible, healthy, and safe housing choices to every resident in King County as it would continue to limit the range of housing options in many areas of Seattle.

The No Action Alternative would provide capacity to minimum housing and growth targets consistent with VISION 2050, but other elements of the Comprehensive Plan would not reflect more recent VISION 2050 policies regarding equity, climate change, and others. The No Action Alternative would not include a new climate element to meet GMA requirements or VISION 2050 policies nor address the findings of the equity evaluation of Seattle 2035 plan.

Greenhouse gas emissions could increase for buildings and waste and less so for transportation under the No Action Alternative; per capita air emissions would be slightly higher than under the action alternatives but still lower than existing per capita rates. See **Section 3.2 Air Quality & GHG Emissions**.

130th/145th Station Area

The *130th and 145th Station Area Plan* and its vision and strategies would not be implemented under the No Action Alternative. Housing and job growth around both station areas would be minimal.

Impacts of Alternative 2: Focused

Policies: All the action alternatives, including Alternative 2, would update the Comprehensive Plan policies to meet state and regional requirements. Areas of focus include the following:

- **Climate Change:** The Comprehensive Plan will include new climate policies focused on reducing emissions from buildings and transportation and making the city more capable of

withstanding the impacts of climate change. Long-range policies will bring Seattle closer to being carbon neutral by 2050 and adapt to climate exposures despite rising seas, heat waves, flooding, and more extreme storms. Seattle is committed to collaborating with partners to reach county, regional, and statewide goals.

- **Economic Development:** The Economic Development Element will seek to support and grow neighborhood commercial districts, sustain a healthy climate for growing and emerging industries, and support the city's competitive advantage in the industrial and maritime sectors. The update will include policies to ensure equitable access to living-wage careers for all residents and allow BIPOC communities to be able to share equally in the benefits of Seattle's growing economy.
- **Housing:** A new element would meet new GMA requirements and address additional housing types and affordability levels. The intent is to address the City's severe housing shortage and increasing rents and home sales prices, provide resources for low-income housing, address the underproduction of smaller and lower cost homes, remove racial disparities in housing access and homeownership, reduce displacement risks, and reduce the risks of becoming homeless.
- **Parks and Open Space:** The City will develop strategies that expand, connect, improve, and maintain Seattle's public space network. The effort centers racial equity to support the health and well-being of all communities. The work will include identifying how public space can help provide resilience to climate change. The Plan will also look at ways Seattle can deliver green improvements to neighborhoods that are vulnerable to displacement in ways that support community stability.
- **Transportation:** The Transportation Element contains broad policy guidance for a transportation system that meets the city's mobility needs and advances climate, safety, and equity goals. The element will address growth across Seattle by supporting improvements to benefit walking, biking, transit, and freight mobility. The Comprehensive Plan is being updated at the same time as the Seattle Transportation Plan, which will provide more details about strategies and actions Seattle will take to fulfill a collective transportation vision.
- **Environment and Climate Element:** A chapter of the plan will address new requirements of HB 1181 to provide a climate change and resiliency element including GHG reduction and resiliency sub-elements. Goals include becoming carbon neutral by 2050 and being prepared for direct and indirect impacts of climate change and other natural hazards.

Growth Targets and Strategies: Alternative 2 would provide more housing in areas of focused growth than Alternative 1 which would support an improved jobs/housing balance.

Allowing for greater growth in Metropolitan Cities to provide more housing types and support transit is consistent with VISION 2050. See also **Section 3.8 Population, Housing, & Employment** for a discussion of how Alternative 2 impacts housing and addresses new GMA housing requirements in HB 1220.

Consistency with State and Regional Environmental Goals: Alternative 2 would allow for improved water quality where new development implements modern stormwater standards.

More growth could accelerate loss of tree canopy unless development standards are modified as noted in **Section 3.3 Plants & Animals** and **Section 3.6 Land Use Patterns & Urban Form**. Air quality results show slightly reduced per capita emissions compared to the No Action Alternative including reduced transportation emissions (see **Section 3.2 Air Quality & GHG Emissions**).

130th/145th Station Area

Land use designations, zoning, and policies under Alternative 2 would implement the *130th and 145th Station Area Plan* vision and strategies. Both stations areas would see more growth clustered in the newly designated neighborhood centers compared to the No Action Alternative and existing conditions. Growth would increase activity units from 18.6 (existing) to 29.9 around NE 130th Street and from 35.7 (existing) to 83.3 around 15th and 145th.

Impacts of Alternative 3: Broad

Impacts under Alternative 3 are similar to those described under Alternative 2, except that more attention to middle housing types would occur in Neighborhood Residential Areas. This could help implement VISION 2050 policies that allow for more housing capacity in Metropolitan cities to support middle housing types.

130th/145th Station Area

Not applicable. The *130th and 145th Station Area Plan* would not be implemented.

Impacts of Alternative 4: Corridor

Impacts under Alternative 4 are similar to those described under Alternative 2. Allowing for additional housing types around high-capacity transit corridors would help implement VISION 2050 policies that allow for more housing capacity in Metropolitan cities to address transit investments.

130th/145th Station Area

Not applicable. The *130th and 145th Station Area Plan* would not be implemented.

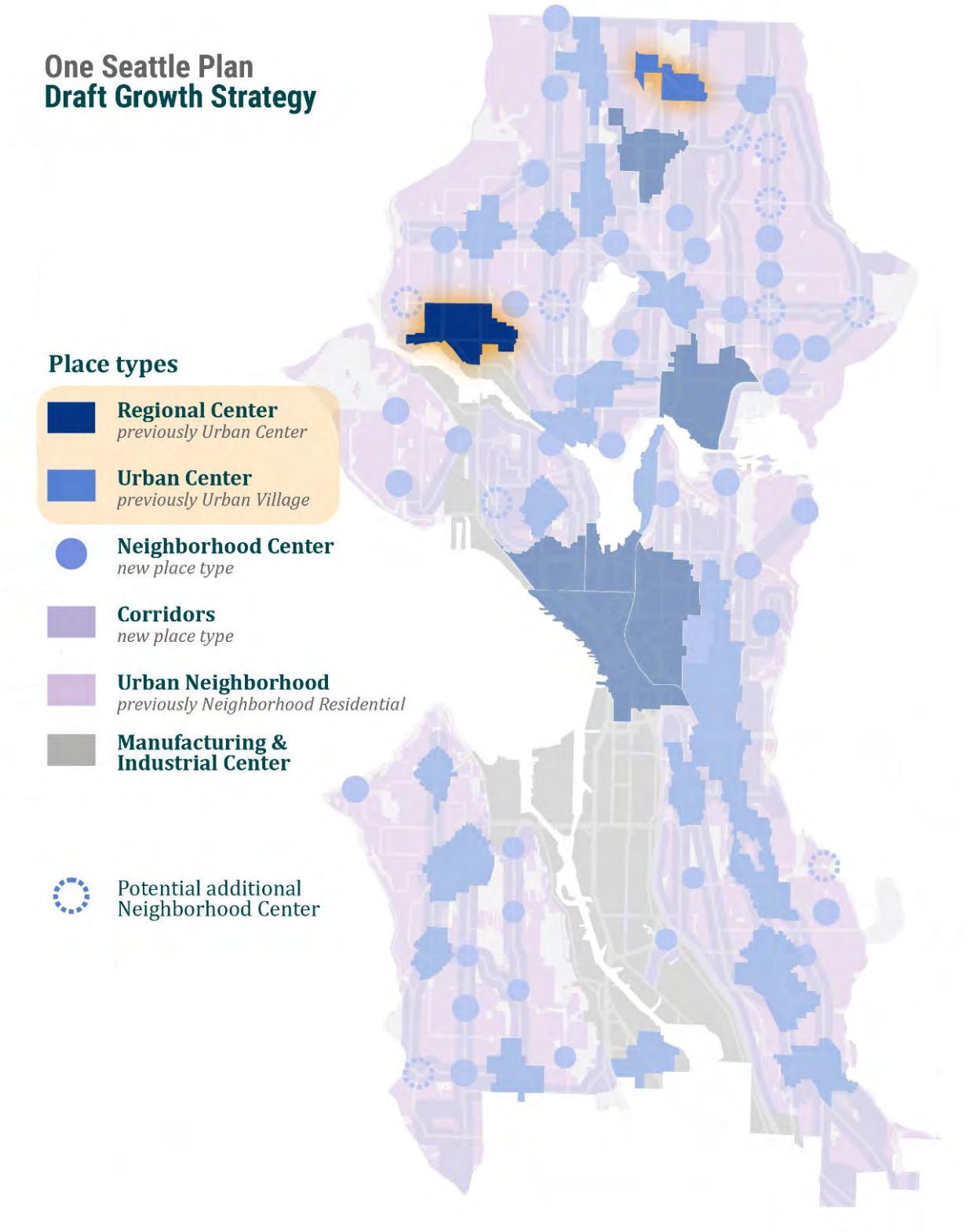
Impacts of Alternative 5: Combined

Alternative 5 would update the Comprehensive Plan to meet state and regional requirements. Alternative 5 and the Preferred Alternative ~~It~~ would also provide the greatest capacity for housing to meet affordability and jobs/housing balance goals, benefiting the region's environmental conservation goals.

The City intends to designate two new centers under Alternative 5—one under PSRC's VISION 2050 plan and one under the CPP countywide centers, though it must be nominated in the countywide planning policies (DP-32). See **Exhibit 3.7-10** and **Section 3.6 Land Use Patterns & Urban Form**:

- The existing **Ballard** Hub Urban Village would be redesignated as a regional center. It would likely be proposed to be designed as an Urban RGC ~~regional center~~ by the Puget Sound Regional Council as part of future processes. The proposed regional growth center in Ballard would meet PSRC designation criteria for size and existing and planned future activity units with a study area of 495 acres and 67.7 existing and 101.0 planned activity units by 2044.
- The **NE 130th Street Station Area** would be designated a new urban center. It would likely be proposed to be designated as a Countywide Center as part of future processes. The proposed center at NE 130th Street Station Area would meet countywide center designation criteria for existing and planned future activity units with 18.4 exiting and 35.5 planned activity units by 2044.

Exhibit 3.7-10. Proposed Redesignated and New Centers—Alternative 5



Source: City of Seattle, 2023.

The Alternative also expands existing urban centers and villages.[34] The boundary expansions for regional and urban centers are intended to allow them to comply with Countywide Center criteria for size. The Admiral, Morgan, and Upper Queen Anne centers do not meet activity units for Countywide Centers (30 activity unit threshold) in Alternative 5 though their size would meet standards. A preferred alternative, if included in the Final EIS, could allocate more growth in those center locations such as by moving housing and job allocations from corridors or other place types. See **Exhibit 3.7-11** and **Exhibit 3.7-12**.

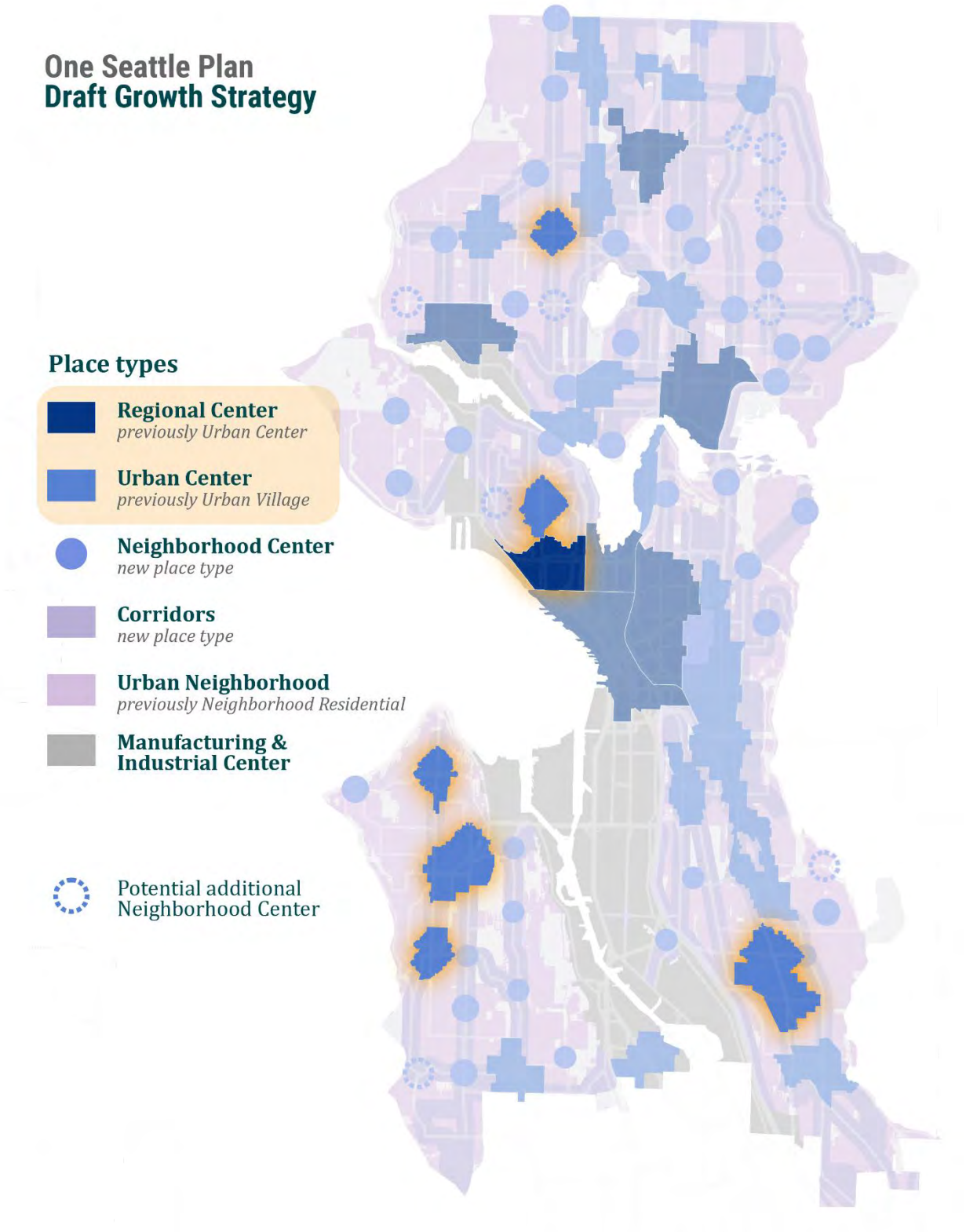
Exhibit 3.7-11. Proposed Center Expansions—Alternative 5

Type of Expansion	Centers	Size and Future Activity Units/Acre
Expand centers too small to meet **Countywide Center criteria** to include all areas within a 7.5-minute walk (2,000 feet) of central intersection	▪ Greenwood–Phinney Ridge ▪ Upper Queen Anne ▪ Admiral ▪ Morgan Junction	▪ Greenwood–Phinney Ridge: 315 Acres, 30.4~~7~~ Activity Units ▪ Upper Queen Anne: 329 Acres, 17.8 Activity Units ▪ Admiral: 288 acres, 23.9 Activity Units ▪ Morgan Junction: 281 acres, 25.5 Activity Units
Expand centers with **new light rail stations** to include all areas within a 10-minute walk (half-mile) of light rail station	▪ Uptown ▪ Graham Street (Othello) ▪ West Seattle Junction at Avalon if station approved by ST board	▪ Uptown: 391 acres, 137.2 Activity Units ▪ Graham Street (Othello): 584 acres, 30.6 Activity Units ▪ West Seattle Junction at Avalon: 449 acres, 59.9 Activity Units

Source: City of Seattle, 2023; BERK 2023.

[34] See **Exhibit 2.1-1** in **Chapter 2** for a cross-walk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~A~~lternatives ~~2-5~~. Alternative 1 No Action would retain the City's Seattle 2035 urban village strategy and center/village designations—the existing urban centers and villages are categorized here according to the new place types proposed under the other a~~A~~lternatives ~~2-5~~ for comparison purposes only. Ballard would remain a "Hub Urban Village" under Alternative 1, would be called an "Urban Center" under Alternatives 2-4~~5~~, and would be redesignated as a Regional Center (as shown here) under Alternative 5 and the Preferred Alternative.

Exhibit 3.7-12. Expanded Regional & Urban Centers—Alternative 5



Source: City of Seattle, 2023.

The City may also seek countywide center designation for all urban centers under Alternative 5 to help facilitate infrastructure investments and be locations for facilitated environmental review. This includes responding to SB 5412 which allows for an infill exemption for housing and mixed-use development when considered in an EIS for a Comprehensive Plan. As part of this EIS process state agencies including WSDOT have been consulted and mitigation measures both current regulations and other proposed mitigation could apply to reduce impacts. See **Appendix C** for a list of codes providing mitigation for environmental impacts.

See also **Section 3.8 Population, Housing, & Employment** for a discussion of how Alternative impacts housing and affordability.

130th/145th Station Area

The 130th and 145th Station Areas would have a high intensity of growth around the transit investment under Alternative 5 that would help fulfill the station area plan vision and strategies. A Planned Action Ordinance or other SEPA facilitation options could help advance the vision and implementation of strategies as development occurs.

Impacts of Preferred Alternative

Note: The impacts analysis for the Preferred Alternative was added since the Draft EIS.

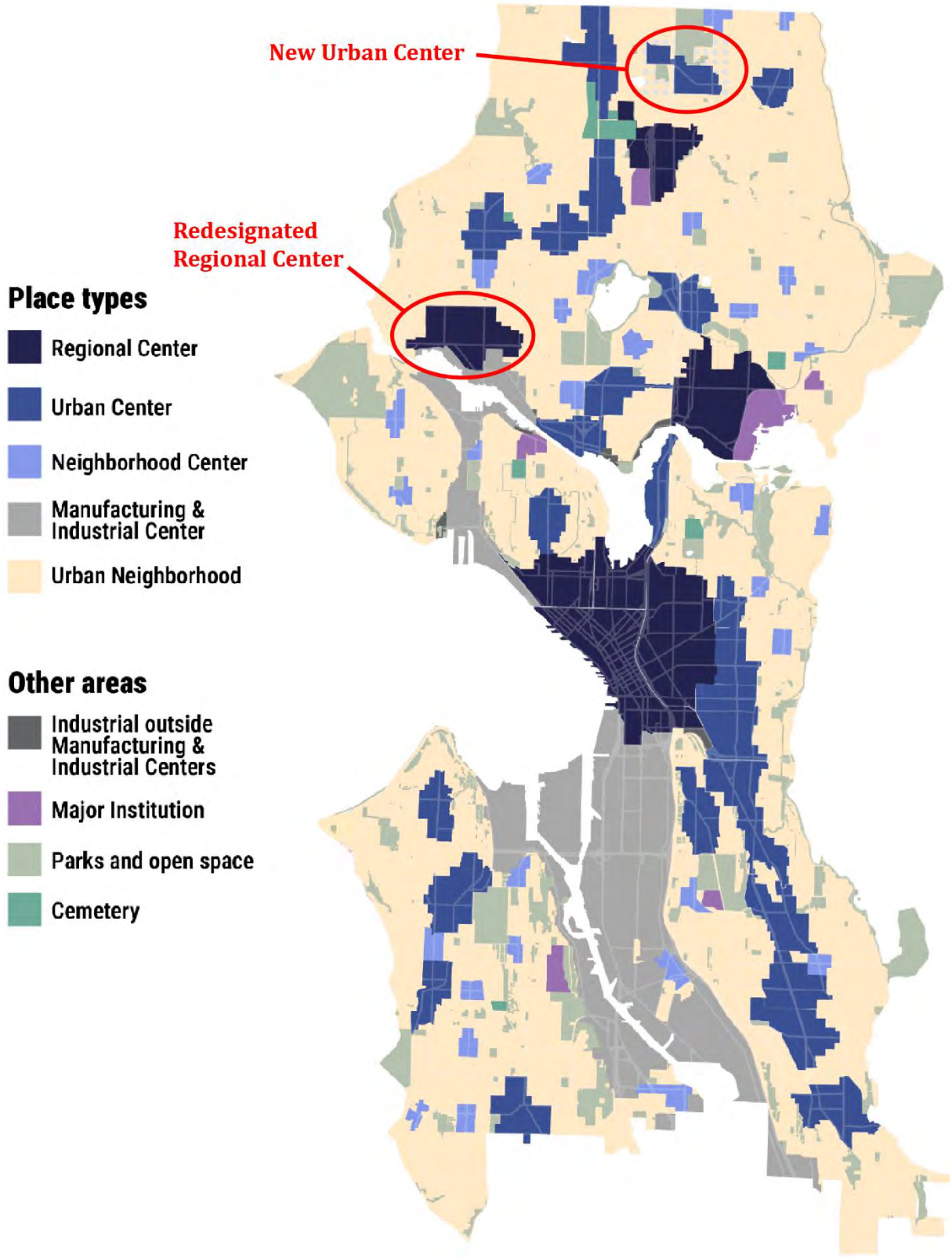
Impacts under the Preferred Alternative are similar to those described under Alternative 5. Like Alternative 5, the Preferred Alternative would update the Comprehensive Plan to meet state and regional requirements and would provide the greatest capacity for housing to meet affordability and jobs/housing balance goals, benefiting the region's environmental conservation goals.

The City intends to designate the same two new centers under the Preferred Alternative as Alternative 5—one under PSRC's VISION 2050 plan and one under the CPP countywide centers, though it must be nominated in the countywide planning policies (DP-32). See **Exhibit 3.7-13** and **Section 3.6 Land Use Patterns & Urban Form**:[35]

- The existing **Ballard** Hub Urban Village would be redesignated as a regional center. It would likely be proposed to be designed as an Urban RGC by the Puget Sound Regional Council as part of future processes. The proposed regional growth center in Ballard would meet PSRC designation criteria for size and existing and planned future activity units with a study area of 495 acres and 57.9 existing and 83.7 planned activity units by 2044.
- The **NE 130th Street Station Area** would be designated a new urban center. It would likely be proposed to be designated as a Countywide Center as part of future processes. The proposed center at NE 130th Street Station Area would meet countywide center designation criteria for planned future activity units with 33.2 planned activity units by 2044. However, existing activity units are slightly below countywide center designation criteria at 17.3.

[35] The Preferred Alternative uses updated and more detailed information to calculate existing and future activity units per acre for each center than Alternatives 1–5. See **Exhibit 3.6-121** in **Section 3.6 Land Use Patterns & Urban Form** and **Appendix B**.

Exhibit 3.7-13. Proposed Redesignated and New Centers—Preferred Alternative



Source: City of Seattle, 2024.

University Community and Northgate would be below PSRC's future activity unit threshold for Metro RGCs but be above the threshold for Urban RGCs (like the other alternatives) as would Uptown which could result in redesignation from Metro to Urban RGC in the future. The Preferred Alternative also expands the boundaries of nine existing centers and splits 23rd and Union Jackson and Othello into two urban centers each.[36] The boundary revisions for regional and urban centers are intended to allow them to comply with Countywide Center criteria for size and activity unit thresholds. All urban centers would meet King County's minimum future density criteria for Countywide Centers (including, the split Othello and Graham centers and Rainier Beach) but Green Lake, Lake City, and Madison-Miller would still be below the size threshold. The Preferred Alternative also redesignates South Park as a neighborhood center (previously an urban center under the other alternatives).

See **Exhibit 3.7-14** and **Exhibit 3.7-15**.

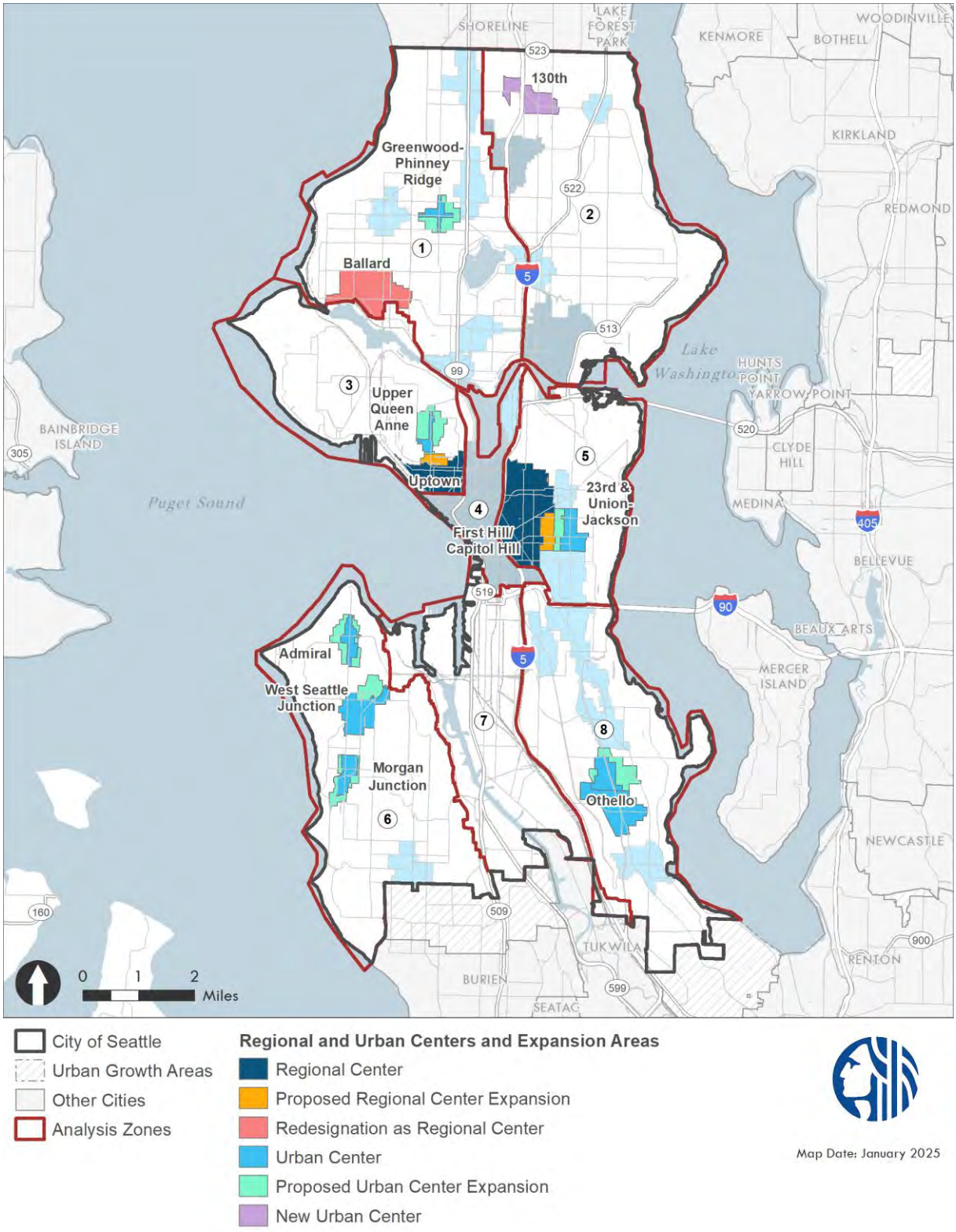
Exhibit 3.7-14. Proposed Center Expansions and Splits—Preferred Alternative

Type of Expansion	Centers	Size and Future Activity Units/Acre
Expand centers too small to meet **Countywide Center criteria**	▪ Greenwood–Phinney Ridge ▪ Upper Queen Anne ▪ Admiral ▪ Morgan Junction	▪ Greenwood–Phinney Ridge: 197 Acres, 55.3 Activity Units ▪ Upper Queen Anne: 208 Acres, 46.9 Activity Units ▪ Admiral: 219 acres, 37.8 Activity Units ▪ Morgan Junction: 198 acres, 35.1 Activity Units
Expand centers with **new light rail stations** to include all areas within a 10-minute walk (half-mile) of light rail station	▪ Uptown ▪ First Hill/Capitol Hill ▪ West Seattle Junction at Avalon if station approved by ST board	▪ Uptown: 389 acres, 101.9 Activity Units ▪ First Hill/Capitol Hill: 1,015 acres, 129.6 Activity Units ▪ West Seattle Junction at Avalon: 367 acres, 67.6 Activity Units
Expand centers with **new light rail stations** to include all areas within a 10-minute walk (half-mile) of light rail station ***and*** split center too large to meet **Countywide Center criteria**	▪ 23rd & Union Jackson, split into Central District and Judkins Park ▪ Othello, split into Othello and Graham	▪ Central District: 232 acres, 44.6 Activity Units ▪ Judkins Park: 467 acres, 46.5 Activity Units ▪ Othello: 353 acres, 35.8 Activity Units ▪ Graham: 291 acres, 32.0 Activity Units

Note: See **Exhibit 3.6-121** in **Section 3.6 Land Use Patterns & Urban Form** for the size and existing and planned activity units per acre by center under the Preferred Alternative.
Source: City of Seattle, 2024; BERK 2024.

[36] See **Exhibit 2.1-1** in **Chapter 2** for a cross-walk of existing place types (existing and Alternative 1) versus proposed place type names under the other alternatives. Alternative 1 No Action would retain the City's Seattle 2035 urban village strategy and center/village designations—the existing urban centers and villages are categorized here according to the new place types proposed under the other alternatives for comparison purposes only. Ballard would remain a "Hub Urban Village" under Alternative 1, would be called an "Urban Center" under Alternatives 2-4, and would be redesignated as a Regional Center (as shown here) under Alternative 5 and the Preferred Alternative.

Exhibit 3.7-15. Expanded Regional & Urban Centers—Preferred Alternative



Source: City of Seattle, 2025; BERK, 2025.

The City may also seek countywide center designation for all urban centers under the Preferred Alternative to help facilitate infrastructure investments and be locations for facilitated environmental review. This includes responding to SB 5412 which allows for a SEPA exemption for housing and mixed-use development when considered in an EIS for a Comprehensive Plan. As part of this EIS process state agencies including WSDOT have been consulted and mitigation measures both current regulations and other proposed mitigation could apply to reduce impacts. See **Appendix C** for a list of codes providing mitigation for environmental impacts.

See also **Section 3.8 Population, Housing, & Employment** for a discussion of how Alternative impacts housing and affordability.

130th/145th Station Area

The 130th and 145th Station Areas would have a high intensity of growth around the transit investment under the Preferred Alternative that would help fulfill the station area plan vision and strategies. A Planned Action Ordinance or other SEPA facilitation options could help advance the vision and implementation of strategies as development occurs.

3.7.3 Mitigation Measures

Incorporated Plan Features

The action alternatives propose a new growth strategy with the following goals:

- **Growth**: Accommodate new housing and jobs over the next 20 years and beyond
- **Housing**: Increase the supply, diversity, and affordability of housing to reduce upward pressure on prices and expand choices for diverse households
- **Equity**: Redress harms from neighborhood exclusion and housing discrimination, meet the housing needs of BIPOC households, and support wealth building opportunities
- **Displacement**: Prevent the displacement of existing residents due to direct impacts and market forces.
- **Complete, climate-friendly neighborhoods**: Create and support communities where more people can access transit, shops, and services by walking and biking.
- **Encourage a diverse mix of businesses and jobs** in neighborhoods across the city and help existing business remain in place.

The action alternatives also propose new housing and place types to help meet affordable housing needs and address racially disparate impacts in support of the City's response to HB1220 (see **Section 3.8 Population, Housing, & Employment**). The action alternatives promote housing types in other bills relevant to middle housing HB 1110 and accessory dwelling units in HB 1137.

A new Environment and Climate Element would meet requirements of HB 1181.

Regulations & Commitments

As required by GMA, the City must submit proposed Comprehensive Plan amendments and updated regulations for review and comment by the State prior to final adoption.

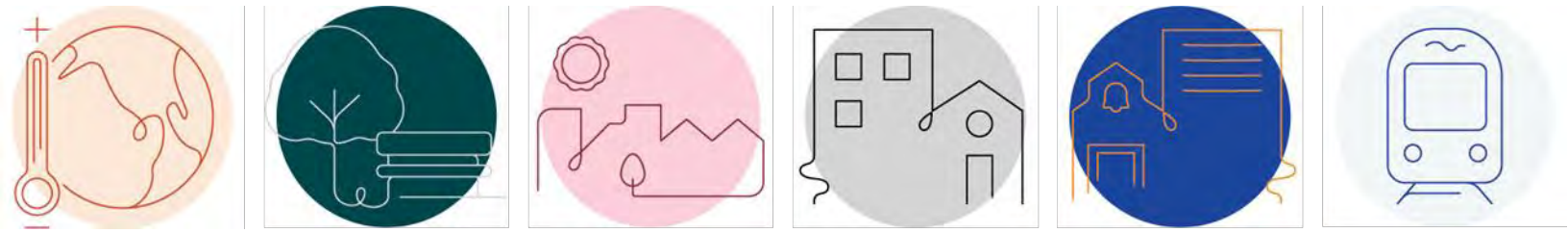
Other Potential Mitigation Measures

~~When a Preferred Alternative is developed, it should be evaluated for conformity to state and regional plans and policies. It may include reallocating growth assumptions in place types while being in the range of the studied alternatives (e.g. to meet Countywide Center or Regional Growth Center criteria).~~ In this Final EIS, the Preferred Alternative is evaluated for conformity to state and regional plans and policies. Activity units would be met; however, some adjustments to center designation type or acreage may be appropriate (e.g., to meet Countywide Center or Regional Growth Center criteria). See **Section 3.6.2** regarding the Preferred Alternative.

3.7.4 Significant Unavoidable Adverse Impacts

No significant unavoidable adverse impacts are anticipated with respect to plans and policies. Inconsistencies with new regional plans and state requirements and the regional growth strategy under the No Action Alternative would be avoided through amendments to the Comprehensive Plan proposed under the action alternatives.

3.8 Population, Housing, & Employment



Source: City of Seattle, 2023.

This section addresses population, employment, and housing, as well as the historical context of racial segregation that has contributed to today's demographic patterns. A review of these aspects of the affected environment—on a citywide scale and for each analysis area—will serve as a baseline for analyzing the impacts of the five alternatives.

The analysis of impacts addresses likely outcomes of each alternative on Seattle's population, employment, and housing stock. A primary focus of this analysis is the evaluation of how effectively each alternative achieves three objectives:

- Increase the supply, diversity, and affordability of market-rate housing.
- Increase the supply of income-restricted housing.
- Reduce residential displacement.

This analysis also evaluates the potential for increased physical displacement compared to the No Action Alternative. Such an adverse impact is considered significant if the projected number of physically displaced renter households exceeds the projected number of new income-restricted affordable housing units that would be created through Seattle's Mandatory Housing Affordability (MHA) and Multifamily Tax Exemption (MFTE) programs.

Mitigation measures and a summary of any significant unavoidable adverse impacts are included following the impacts analysis.

3.8.1 Affected Environment

Citywide

Population

The City of Seattle's population as of 2022 was 762,500.[37] Population growth in Seattle has been rapid compared to previous decades. Between 2010 and 2020 the city's population grew by more than 20%. In the previous decade, Seattle experienced population growth of 8% (see **Exhibit 3.8-1**).

Exhibit 3.8-1. Total Population of Seattle, 2000-2020

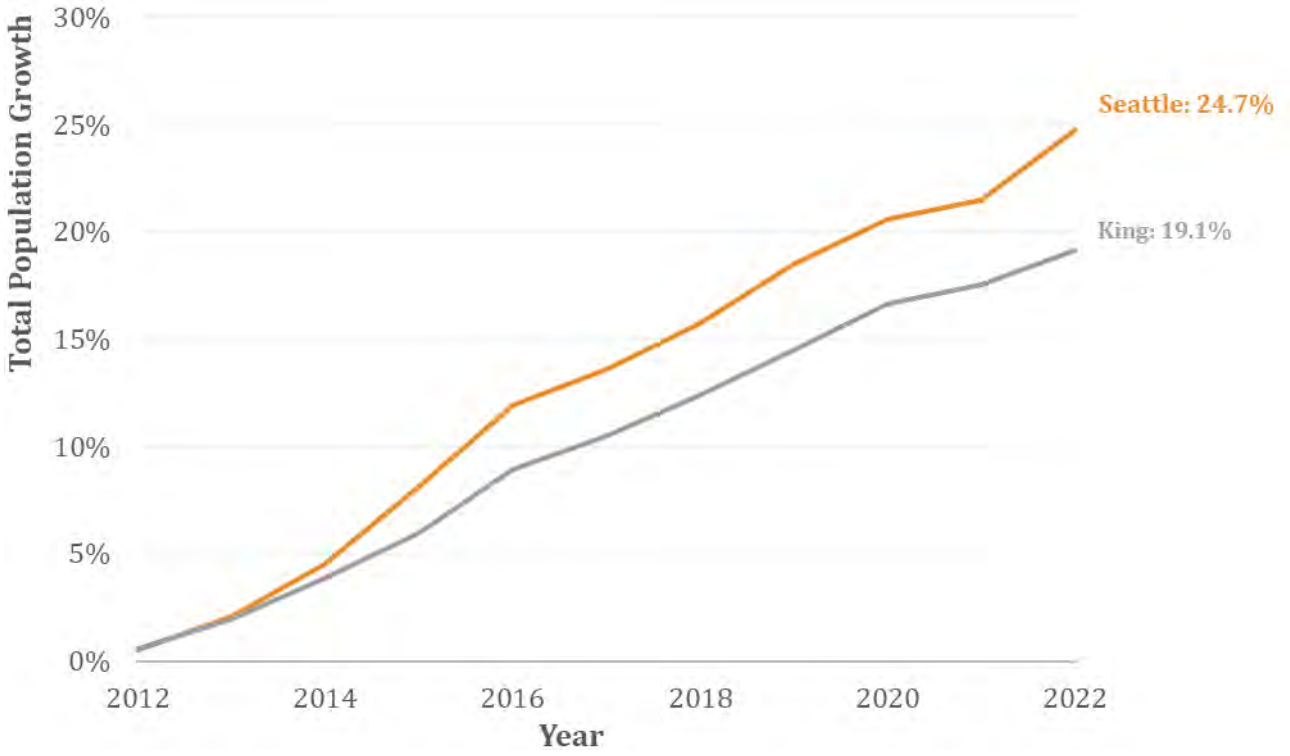
Census Year	Population	% Increase over previous 10 years
2000	563,374	
2010	608,660	8%
2020	737,015	21%

Sources: US Census Bureau, 2000, 2010, 2020.

[37] Washington State Office of Financial Management, 2022.

Over the last decade, Seattle's has grown faster than King County as a whole (about 25% from 2012 to 2022 compared to 19%; see **Exhibit 3.8-2**). Seattle's rapid population growth has been driven in large part by strong job growth and in-migration. Between 2010 and 2020, Seattle gained nearly 176,000 net new jobs. Many of these new jobs attracted foreign-born workers. As of 2021, Seattle's foreign-born population was over 140,000 people (almost one in five Seattle residents) of whom 46% were naturalized U.S. citizens.[38]

Exhibit 3.8-2. Population Growth in Seattle and King County, 2012-2022



Sources: Washington Office of Financial Management, 2022; BERK, 2023.

Exhibit 3.8-3 shows population by analysis area. The population is not evenly distributed among the areas. Areas 1 (Northwest Seattle) and 2 (Northeast Seattle) each have approximately 150,000 residents, compared to under 9,000 in Area 7, which includes the maritime and industrial areas along the Duwamish River. Slightly less than half (46%) of Seattle's residents live in Neighborhood Residential zones, where the predominant housing type is detached homes. The remainder live in zones that feature a greater diversity of housing types, such as apartments or townhomes.

[38] Source: American Community Survey 5-Year Estimates (2017-2021): S0502 SELECTED CHARACTERISTICS OF THE FOREIGN-BORN POPULATION BY PERIOD OF ENTRY INTO THE UNITED STATES

Exhibit 3.8-3. Population by EIS Analysis Area, 2020

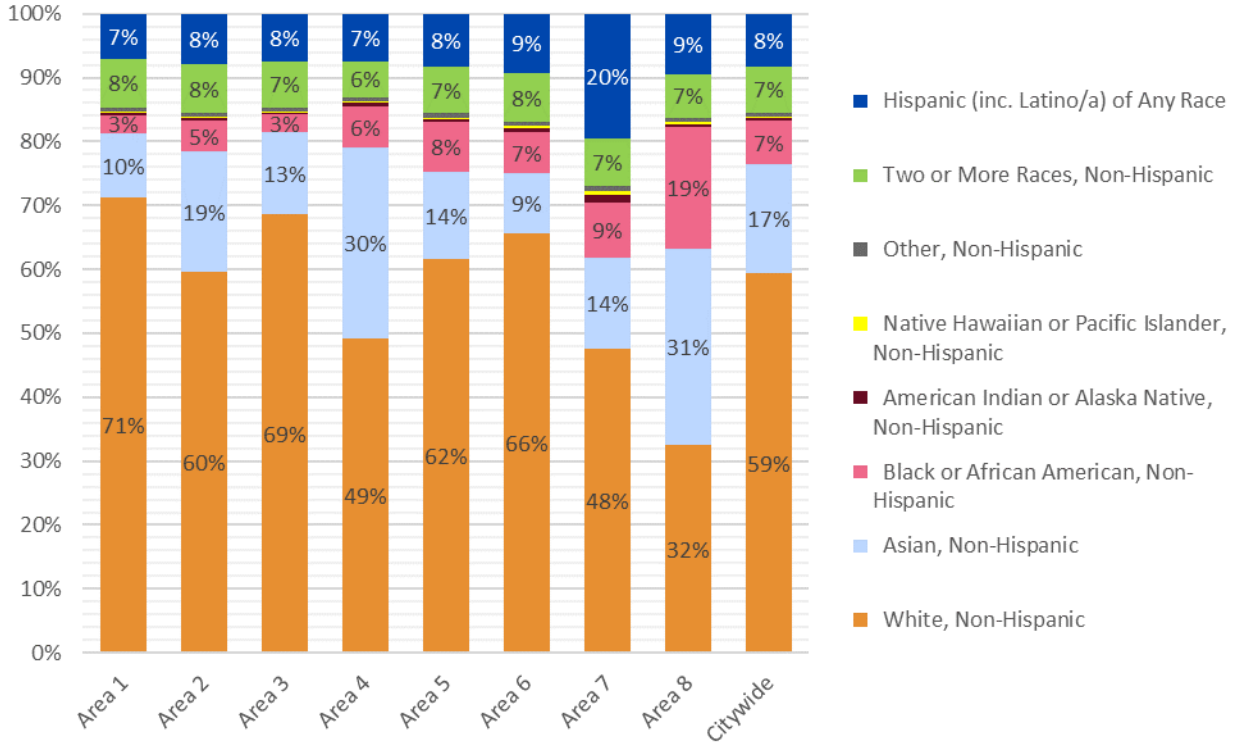
	Area 1	Area 2	Area 3	Area 4	Area 5	Area 6	Area 7	Area 8	Citywide
Population	151,708	148,334	68,927	63,298	108,053	93,220	8,767	94,708	737,015
Percent of total population	21%	20%	9%	9%	15%	13%	1%	13%	

Source: 2020 U.S. Census, Table P2: Hispanic or Latino, and Not Hispanic or Latino by Race; City of Seattle, 2023.

Race & Ethnicity

In 2020, approximately two in five Seattle residents (41%) and more than half of youth under 18 (51%) were people of color.[39] This includes all residents who identify as a race or ethnicity other than White Non-Hispanic.[40] As of 2020, 8% of Seattle residents identified as Hispanic or Latino, 7% as Black or African American, Non-Hispanic; 17% as Asian, Non-Hispanic, and more than 10% as Two or More Races, Non-Hispanic, as shown in **Exhibit 3.8-4**.

Exhibit 3.8-4. Shares of Population by Race and Ethnicity, 2020



Note: Percentage values less than 2% are not labeled for readability.
Sources: US Census (Table P2: Hispanic or Latino, and Not Hispanic or Latino by Race), 2020; City of Seattle, 2023.

[39] Source: 2020 U.S Census, Table P2: Hispanic or Latino, and Not Hispanic or Latino by Race.
[40] Note, the Census group people who identify as "Hispanic" and "Latino" in a single category. References to "Hispanic" in this report are inclusive of persons who identify as Latino or Latina.

The breakdown of population by race varies across the city, as shown in **Exhibit 3.8-4**. The percentage of population that identifies as White, Non-Hispanic ranges from 34% in Area 8 (Southeast Seattle) to 73% in Area 1 (Northwest Seattle). There is also variation by place type. About 67% of residents in Neighborhood Residential zones identify as White, Non-Hispanic, compared to 54% of residents living outside of these zones.[41]

Historical Context of Racial Segregation

Seattle and the Puget Sound Region have a long history of discrimination shaping where people of color could live, own property, and sustain their culture, beginning with the arrival of white European settlers in the Pacific Northwest in the 1840s. At that time, Washington was part of the Oregon Territory and therefore subject to Black exclusion laws, which effectively prohibited Black people from settling or owning property in the territory as a way of ensuring the region's early development was primarily white. In 1855, the Treaty of Point Elliott was signed, establishing tribal reservations and guaranteeing the Tribes hunting and fishing rights in exchange for ceding tens of thousands of acres of their land to European-American settlers. Just ten years later, one of the City of Seattle's first laws after incorporation (Ordinance 5) barred Native people from living within City limits unless employed by a non-Native person.

Exclusion and forced relocation of certain groups continued through the end of the 19th and into the 20th century with anti-immigrant, especially anti-Asian, policies: the 1882 Chinese Exclusion Act and subsequent anti-Chinese riots in Seattle; the Alien Land Law enshrined in Washington's first constitution that prohibited land ownership by "aliens ineligible for citizenship," targeting Asian people whom Congress ruled in 1875 could not become citizens; and forced incarceration of Japanese and Japanese-Americans during World War II. Displacement also resulted from various city building efforts. The creation of the Ship Canal and Ballard Locks in the 1910s lowered the level of Lake Washington by more than eight feet and caused the Black River, on which many Duwamish lived and depended for fishing, to disappear. The construction of Interstate 5 through downtown Seattle resulted in the loss of homes, businesses, and cultural anchors in the Chinatown–International District.

The 20th century saw both the public and private sector turn to land use and housing as tools to protect and concentrate property ownership and wealth within white communities. Zoning was one of the first contemporary practices used to establish and solidify exclusion. In the early 1900s, U.S. cities began to control the type and intensity of land use in cities across the U.S., with Los Angeles and New York as early adopters of standards to separate uses and regulate building form. Shortly after, first Baltimore and then other cities began employing zoning to segregate neighborhoods explicitly on the basis of race. After this practice was ruled unconstitutional in 1917, city officials substituted other standards like minimum lot size and prohibitions on multifamily housing—both still present in Seattle's zoning today—as covert ways to shield white neighborhoods from lower-income residents and people of color.

[41] Sources: US Census (Table P2: Hispanic or Latino, and Not Hispanic or Latino by Race), 2020; City of Seattle, 2023.

While Seattle never had explicit racial zoning, its first zoning ordinance, adopted in 1923, was promoted by the City's own zoning commission as a way to prevent "lowering…the standard of racial strength and virility" and crafted by a planner who touted zoning's power to "preserve the more desirable residential neighborhoods" and prevent movement into "finer residential districts … by colored people." Before the advent of zoning, Seattle's building code regulated development, and dwellings with multiple families were allowed citywide. The 1923 zoning ordinance established and mapped the "First Residence District" where only "detached buildings occupied by one family" were allowed. In the subsequent decades, periodic downzoning expanded the extent of restrictive zoning into areas that previously allowed a mix of housing types. For a century, zoning in Seattle has curtailed access to many neighborhoods by barring lower-cost, denser housing like apartments, thus raising the financial bar to afford housing and reinforcing racial segregation since people of color have disproportionately lower incomes and less wealth due to structural racism.

Furthering this pattern of exclusion were racially restrictive covenants, the use of which arose in response to the Supreme Court's ruling on municipal racial zoning. Racial covenants were enforceable contract language written into deeds, plats, and homeowners association bylaws restricting the sale and use of property based on someone's race, ethnicity, and religion. As some residential areas began to diversify in the 1910s, racial covenants became widespread in Seattle, especially after the Supreme Court validated their use in 1926. Many neighborhoods prohibited the sale or occupancy of property to Asian Americans, Jewish people, and Black people, or even more broadly to anyone "other than one of the White or Caucasian race." One such covenant for the Windermere neighborhood said, "No person or persons of Asiatic, African or Negro blood, lineage or extraction, shall be permitted to occupy a portion of said property, or any building thereon; except domestic servant or servants may be actually and in good faith employed by white occupants of such premises." This practice excluded people of color from much of Seattle and from the opportunity to pursue homeownership, which was emerging in the 20th century as a common pathway to stability and wealth.

Alongside private deeds defining where people of color could not live, the Federal practice of redlining rendered them ineligible for government-backed home mortgages in the few areas where they could. As the U.S. emerged from the Great Depression, the National Housing Act was adopted in 1934 to boost housing stability and expand homeownership by underwriting and insuring home mortgages. To determine eligibility for those loans and delineate ideal areas for bank investment, the Home Owners Loan Corporation (HOLC), a Federal agency, created maps that appraised the creditworthiness of entire neighborhoods based in part on their racial composition. Areas deemed too risky for mortgage lending were shaded in red or "redlined," with a rationale explicitly referencing their racial composition. The neighborhood of Windermere, for example, was touted as "protected…by racial restrictions," while the Central Area redlined because "it is the Negro area of Seattle" and "composed of mixed nationalities." In appraisal standards that undergirded its lending decisions, the Federal Housing Administration (FHA) also employed a "whites-only" requirement, making racial segregation an official requirement of the federal mortgage insurance program and depriving people of color of the opportunity to own a home and build and pass on wealth.

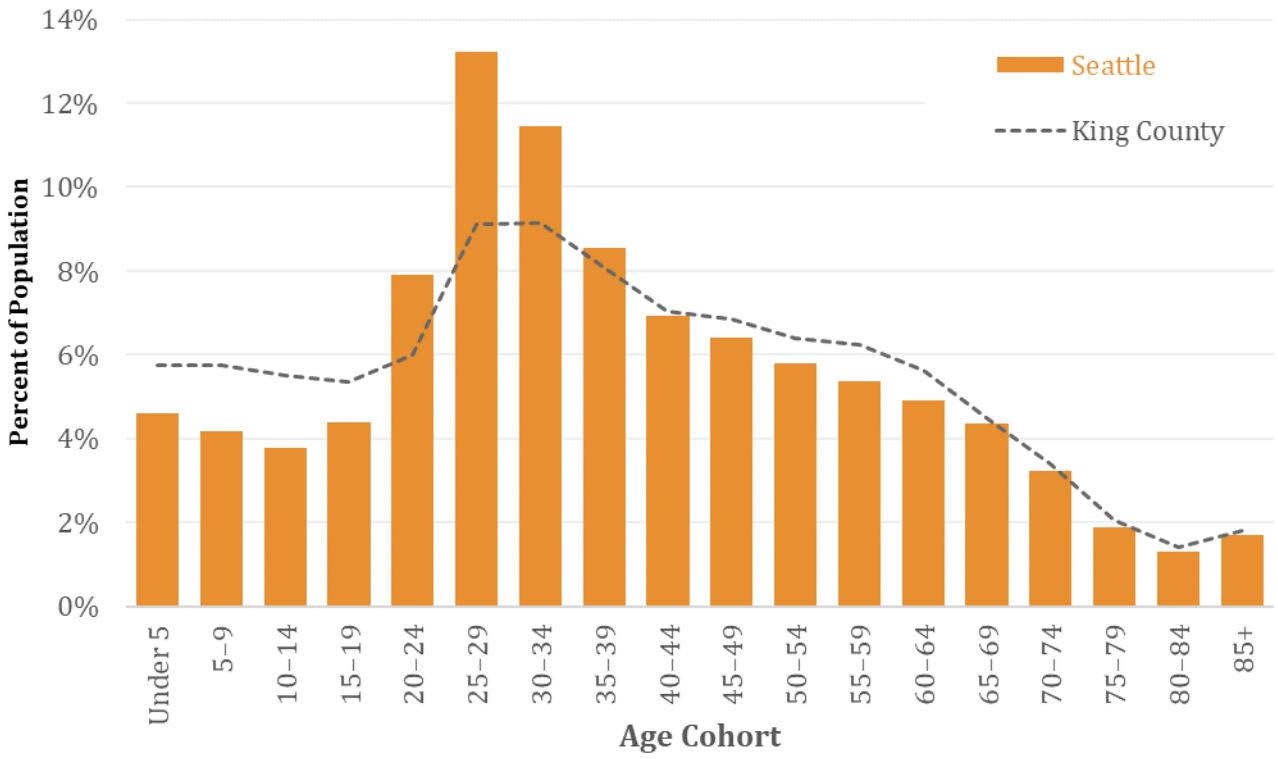
Informal practices and unwritten rules also contributed to housing discrimination. Real estate agents typically didn't show houses in predominantly white neighborhoods to people of color, and, even if they did, purchasing that housing was difficult for a buyer of color. Discrimination in the sale or rental of housing was legal until Congress passed the Fair Housing Act in 1968. But earlier in the decade, local discussions had begun of a potential City ordinance prohibiting housing discrimination. In 1963, Seattle's newly created Human Rights Commission drafted an open housing ordinance with criminal penalties for acts of housing discrimination on the basis of race, ethnic origin, or creed. The City Council referred the legislation to a public vote. Opponents organized and advertised heavily, and in March 1964 the measure failed two-to-one. Seattle eventually adopted Open Housing legislation in 1968, extending its protections against discrimination first in 1975 and as recently as 2017 to other identities and groups.

The legacy of these practices persists in several quantifiable ways that reveal where lasting exclusion and inequality remain. In areas with NR zoning where detached homes predominate, residents are disproportionately White, Non-Hispanic. Households of color generally and Black households in particular are much less likely to own their home compared to White, Non-Hispanic households (35% and 26% compared to 51%, respectively), and in recent years homeownership among people of color has declined faster than for white households, especially for Black households, whose homeownership rate dropped from 37% in 1990 to 23% in 2020. Similarly, Black households in Seattle today are twice as likely as white households to have zero or negative net worth (17.7% versus 33.1%, respectively). These and myriad other disparities originated in the explicit racism of the 19th and 20th centuries, hardened through 100 years of exclusionary zoning, and today persist in large part due to the market pressures of an increasingly unaffordable city.

Age Profile

Exhibit 3.8-5 shows Seattle's population by age range in 2020, with comparison to the age profile of King County. Seattle has a notably higher concentration of young adults, with about a third of its total population in the 19- to 34-year-old range. King County as a whole has a slightly greater share of its population under age 19 or between 45 and 64.

Exhibit 3.8-5. Shares of Population by Age in Seattle and King County, 2020

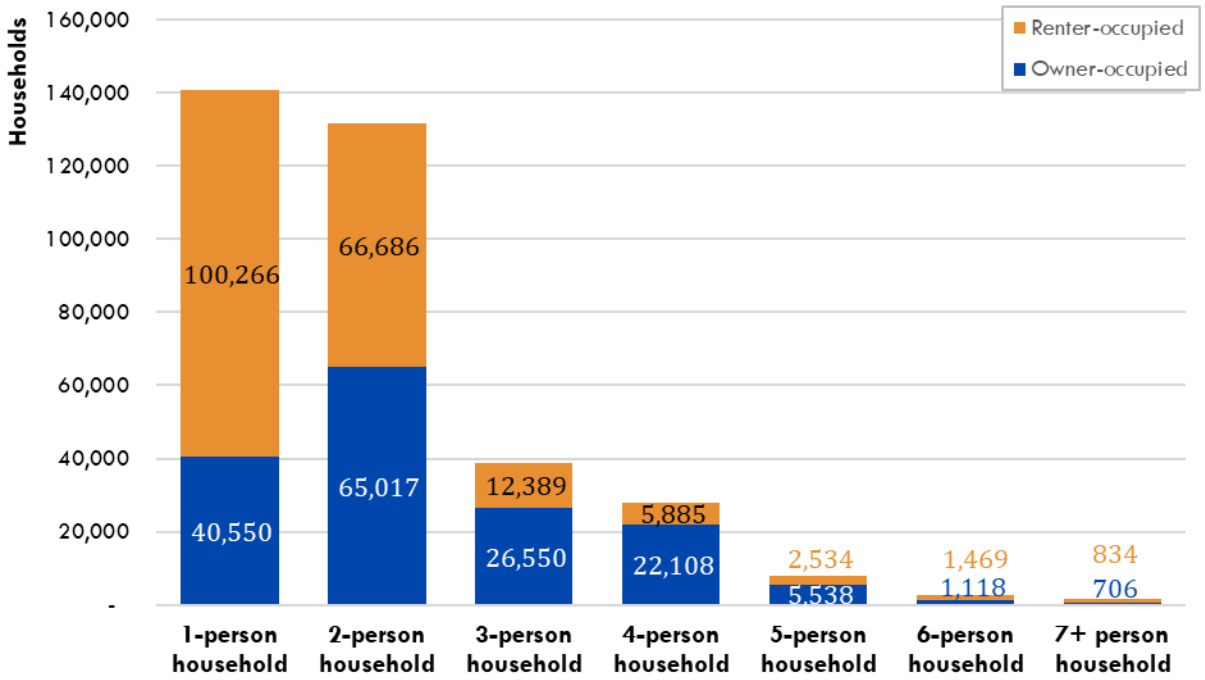


Source: ACS 5-Year Estimates, 2016-2020.

Household Characteristics

In 2021, Seattle had 337,361 households, with an average household size of 2.08.[42] After declines between 1980 and 2000, household size in Seattle has remained relatively steady over the last two decades. In 2021, about 45% of housing units were owner-occupied and 55% renter-occupied,[43] while in 2010 about 49% of households owned their homes.[44] This decline in homeownership rate is at least partly a reflection of new housing in Seattle, three-quarters of which are apartments (see **Exhibit 3.8-7**, below). **Exhibit 3.8-6** breaks down all households in Seattle by tenure and household size. More than three-quarters of Seattle households have only one or two members.

Exhibit 3.8-6. Households by Tenure and Household Size, 2021

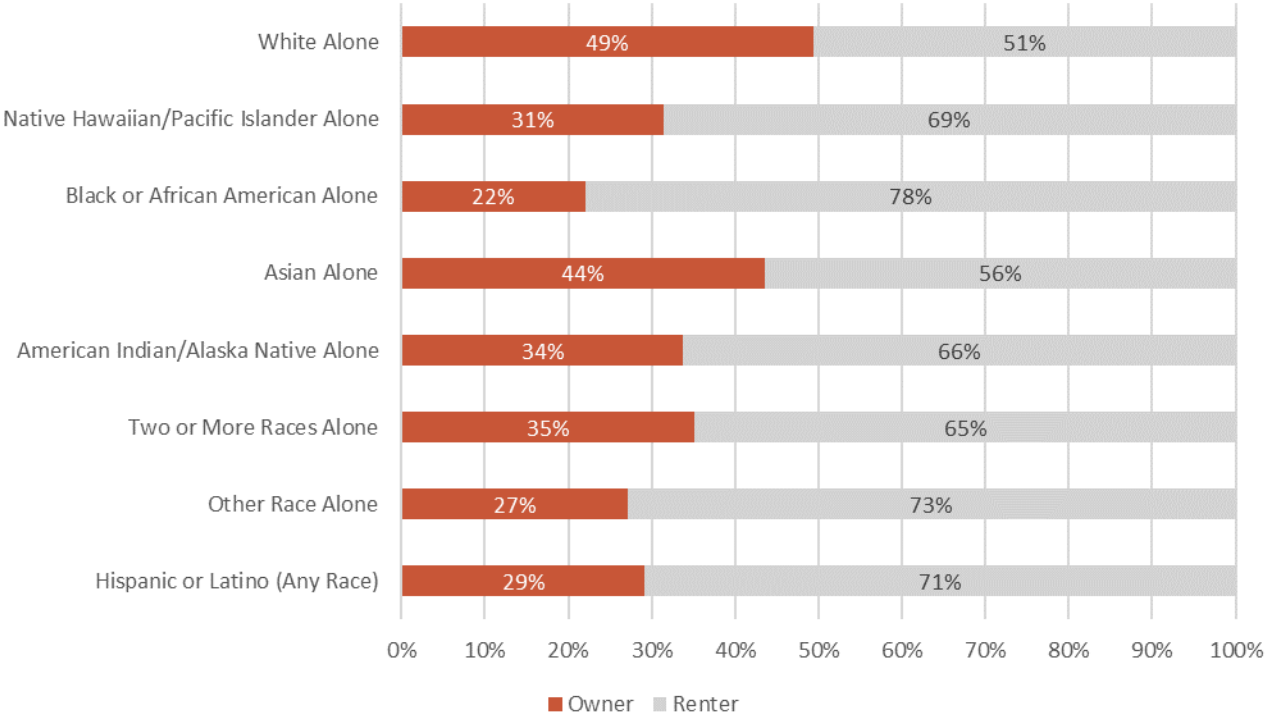


Sources: ACS 5-Year Estimates, 2017-2021 (Table B25009: Tenure by Household Size); BERK, 2023.

Homeownership bestows important benefits for stabilizing housing costs and providing long-term wealth generation potential. However, considerable disparities exist in Seattle's homeownership rate by householder race and ethnicity, as shown in **Exhibit 3.8-7**. Nearly half (49%) of White households in Seattle are homeowners, compared to only 22% of Black households and 29% of Hispanic or Latino households.

[42] Source: American Community Survey 5-Year Estimates (2017-2021): S1101 Households and Families
[43] Source: American Community Survey 5-Year Estimates (2017-2021): B25003: Tenure
[44] Source: American Community Survey 5-Year Estimates (2006-2010): B25003: Tenure

Exhibit 3.8-7. Housing Tenure by Householder Race and Ethnicity, 2021

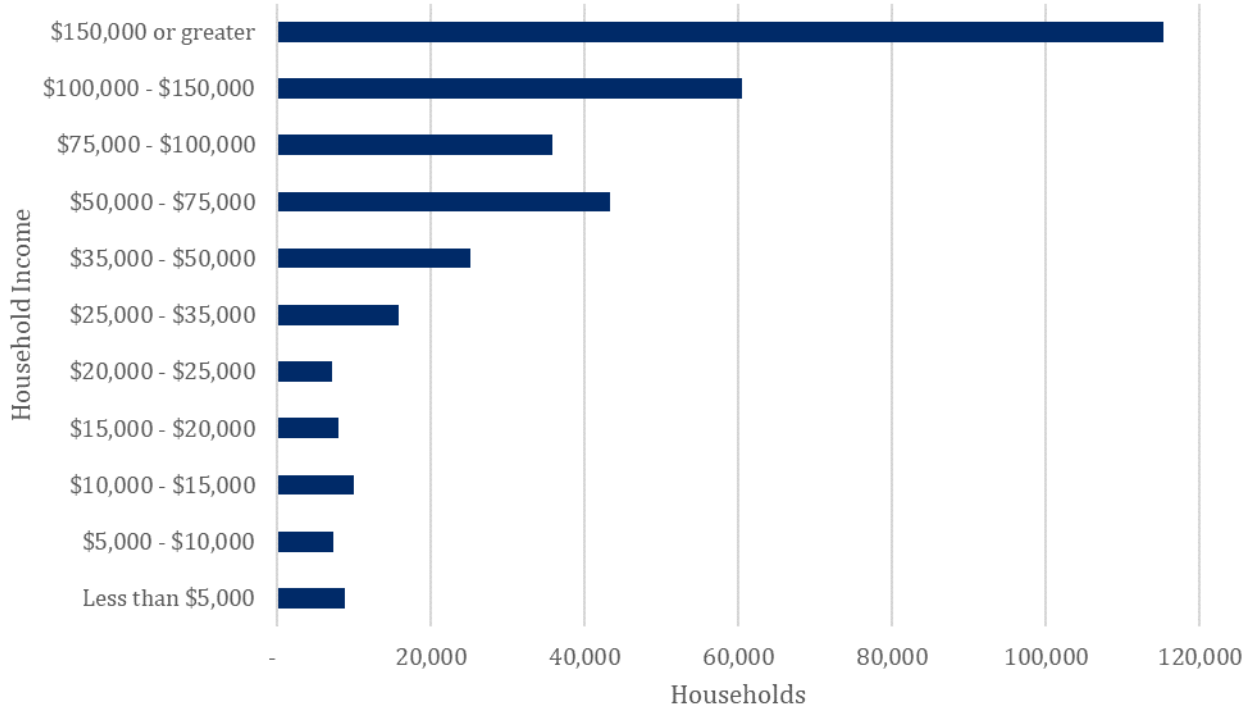


Sources: ACS 5-Year Estimates, 2017-2021 (Table S2502: Demographic Characteristics for Occupied Housing Units); BERK, 2023.

In 2021, the median income of all households in Seattle was $105,391.[45] **Exhibit 3.8-8** shows the distribution of Seattle households by income level. **Exhibit 3.8-9** shows the wide variation in incomes by race and ethnicity of householder. The median income for both Black households and American Indian or Alaskan Native households is less than half that of non-Hispanic White and Asian households.

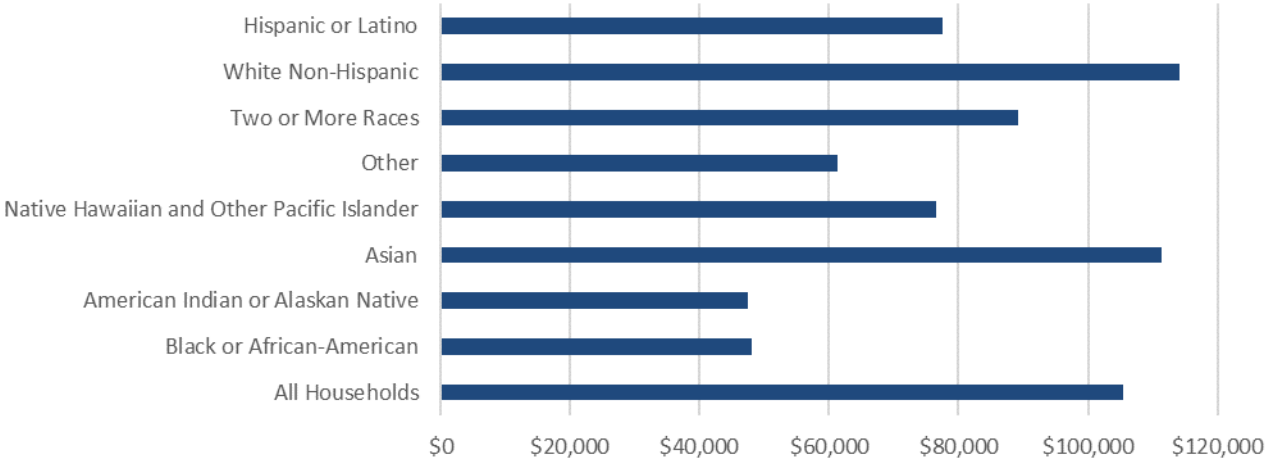
[45] Source: American Community Survey 5-Year Estimates (2017-2021): S1901 Income in the past 12 months (in 2021 inflation-adjusted dollars).

Exhibit 3.8-8. Seattle Households by Income Level, 2021



Sources: ACS 5-Year Estimates, 2017-2021, Table S1901: Income in the past 12 months (in 2021 inflation-adjusted dollars); BERK, 2023.

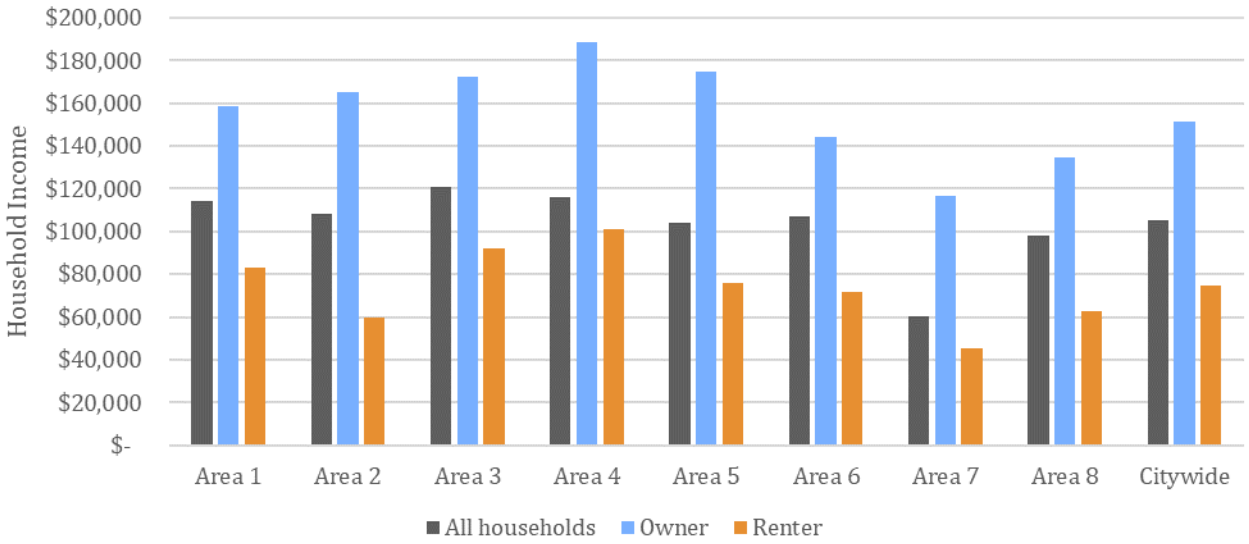
Exhibit 3.8-9. Median Income by Householder Race or Ethnicity, 2021



Sources: ACS 5-Year Estimates, 2017-2021, Table B19013: Median Household Income in the past 12 months (in 2021 Inflation-Adjusted Dollars); BERK, 2023.

Household income also varies substantially across the city and by tenure. **Exhibit 3.8-10** below shows median household income for owner, renter, and all households by analysis area. For all households, average income ranges from $60,000 for the roughly 3,500 occupied units in Area 7 (Port of Seattle and Harbor Island) to more than $180,000 in Area 4 (Downtown Seattle), which has about 40,000 occupied units. Citywide, the median income of owner households ($151,430) is more than twice the median income of renter households ($74,580).

Exhibit 3.8-10. Median Household Income by Tenure and EIS Analysis Area, 2021

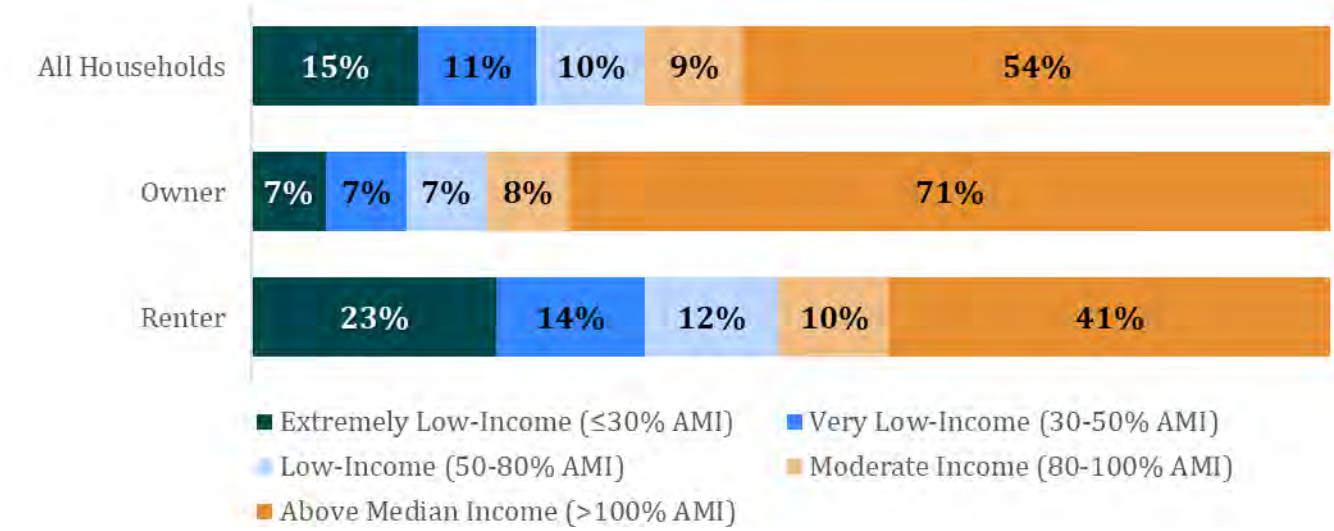


Sources: ACS 5-Year Estimates, 2017-2021 (Table B25119: Median Household Income the past 12 months (in 2021 inflation-adjusted dollars) by Tenure); City of Seattle, 2023; BERK, 2023.

The 2022 HUD Median Family Income (also known as Area Median Income, or AMI) in the Seattle metropolitan area was $134,600.[46] AMI is typically higher than median income reported by the ACS because AMI is based only on the incomes of family households (which may have multiple working-age adults rather than a single person living alone) and is projected forward to the current year. Income limits are typically set relative to AMI when determining eligibility for income-restricted affordable housing. These income limits are also adjusted for household size. **Exhibit 3.8-11** presents the percentage of all households by income level relative to AMI and by tenure. It shows significant income disparities between owner and renter households, with a much higher percentage of owner households having incomes above AMI.

[46] Source: HUD, 2022. https://www.huduser.gov/portal/datasets/il/il2022/2022MedCalc.odn.

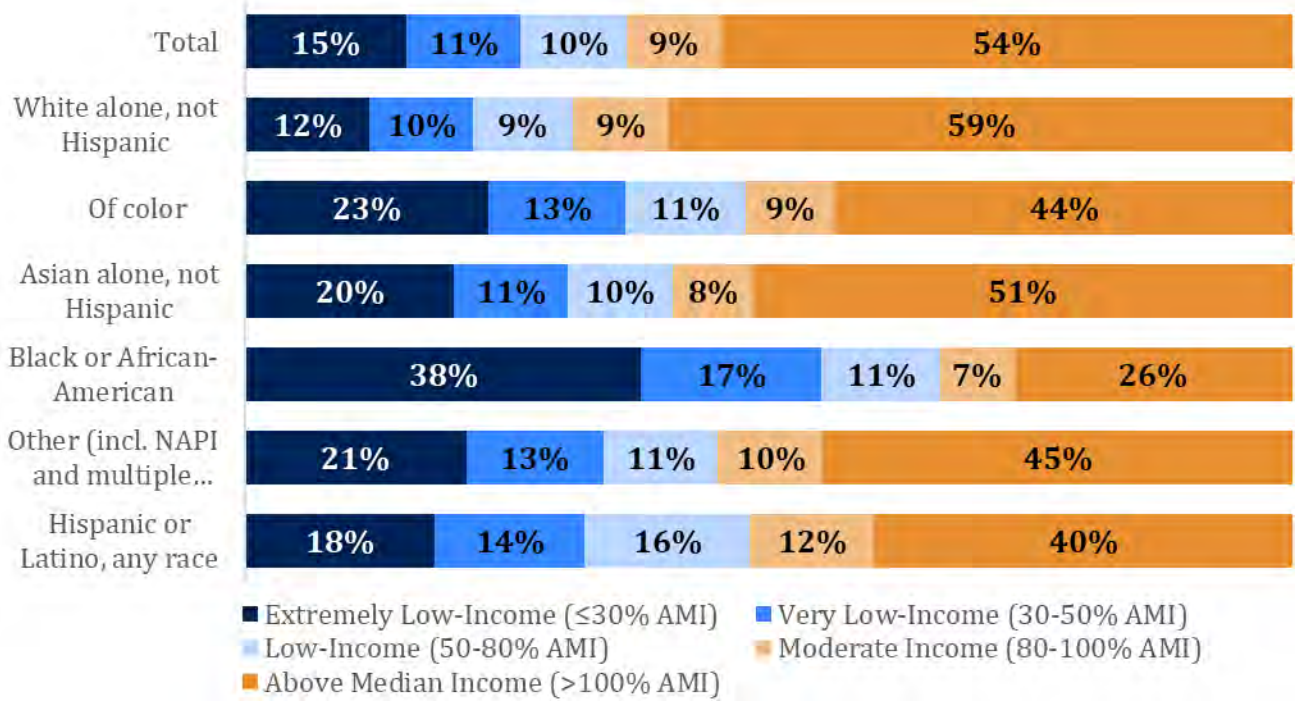
Exhibit 3.8-11. Household Income Level by Tenure, 2015-2019



Sources: US HUD CHAS data, 2015–2019; BERK, 2023.

Household income in Seattle varies considerably by race and ethnicity, as shown in **Exhibit 3.8-12**. As of 2019, only 41% of White, non-Hispanic households had incomes below AMI, compared to 74% of Black or African American households and 64% of all households of color.

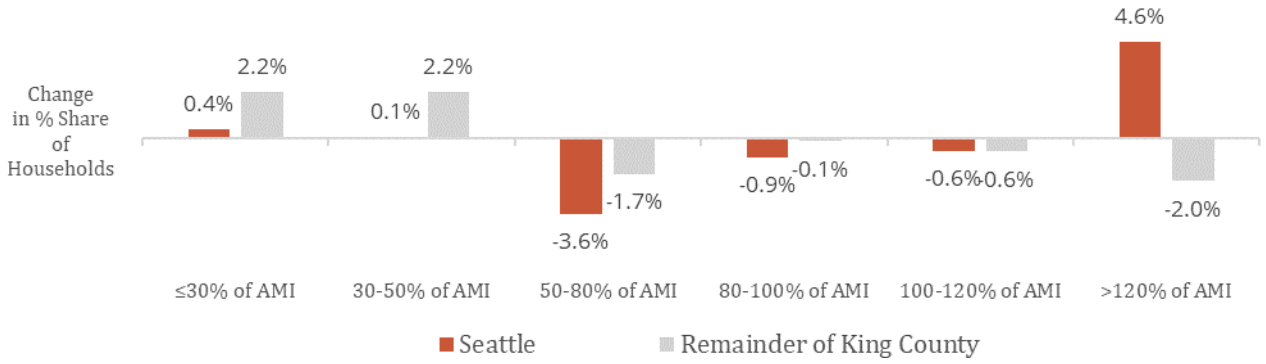
Exhibit 3.8-12. Household Income Level by Race and Ethnicity, 2019



Sources: US HUD CHAS data, 2015–2019; BERK, 2023.

Over the past decade, the distribution of households by income level has changed. **Exhibit 3.8-13** shows the percent change in share of households by income level in both Seattle and the remainder of King County.[47] It shows that much of the increase in new households in Seattle has been among those at the highest income level, while the remainder of King County saw a reduction in the share of these households. During the same period, the share of households with incomes between 50% and 120% of AMI declined in both Seattle and the remainder of King County, although the declines among 50-80% AMI households were much more significant in Seattle. The lowest income bands (0-50% AMI) remained mostly steady in Seattle as a share of total households but increased dramatically in the remainder of King County. These trends suggest that lower-income households are increasingly looking to the remainder of King County for housing, possibly due to the lack of affordable options in Seattle.

Exhibit 3.8-13. Change in Household Income Distribution 2010 5-Year Period to 2019 5-Year Period, Seattle and Remainder of King County



Source: CHAS tabulations of 2006-2010 and 2015-2019 ACS 5-year estimates, U.S. Census Bureau and HUD.

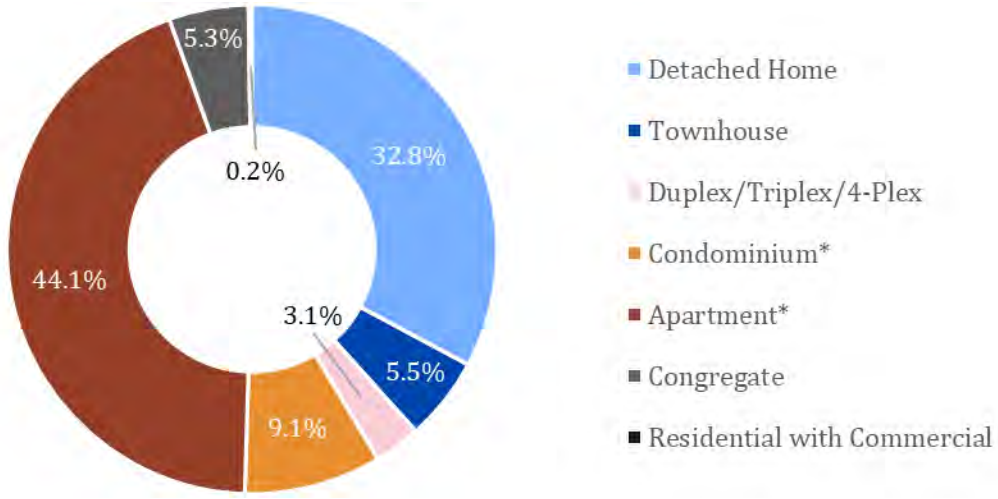
Housing Supply

As of 2022, Seattle had 385,745 housing units and 21,402 congregate residences, such as dormitories, group homes, and certain kinds of senior housing. **Exhibit 3.8-14** breaks down Seattle's housing inventory by type. More than three-quarters of all homes are detached homes (33%) and apartments (44%).

Between 2018 and 2022, more than 46,000 new housing units were built in Seattle.[48] **Exhibit 3.8-15** breaks down these newly constructed homes by housing type. More than three-quarters were apartment units, while townhouses and accessory dwelling units (ADUs) combined comprised 17% of the new inventory. Detached homes accounted for 5%.

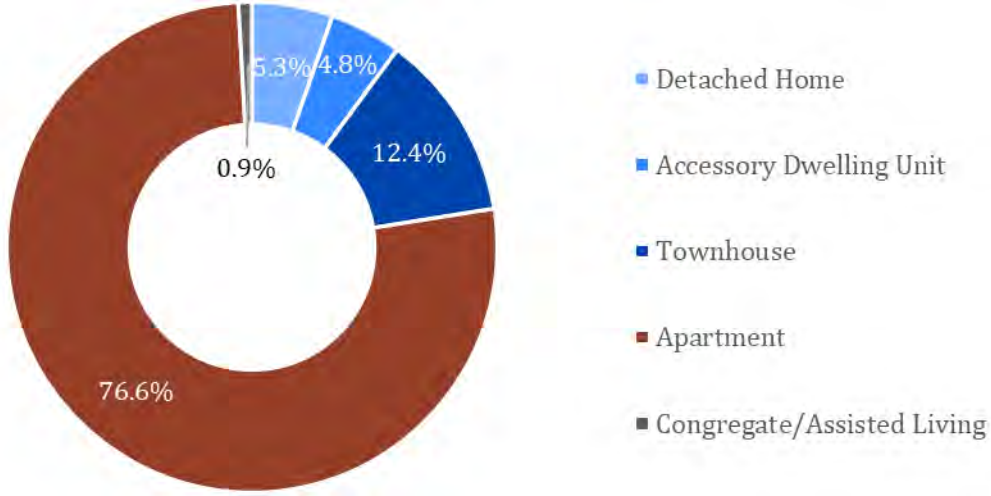
[47] Note that this chart does not show the absolute percentage gain or loss of households by income level. Rather it shows the change in percentage share of total households. So, for example, Seattle may have had a slight decline in share of households at 100-120% AMI while seeing a growth in the total number of these households overall.
[48] Source: Seattle OPCD summary of permit completions from Department of Construction and Inspections, Permit Tracking System. Residential Permitting Trends, 2023.

Exhibit 3.8-14. Housing Unit Inventory by Housing Type, 2022



Note: Condominiums in apartment use are categorized as apartments in this summary. Duplex/Triplex/4-Plex refers to all lots with 2-4 units that are not unit lot subdivided. This includes a combination of detached and attached units.
Sources: King County Department of Assessments, compiled by City of Seattle, July 2022; BERK 2023.

Exhibit 3.8-15. Units in Completed Housing Permits by Housing Type, 2018-2022



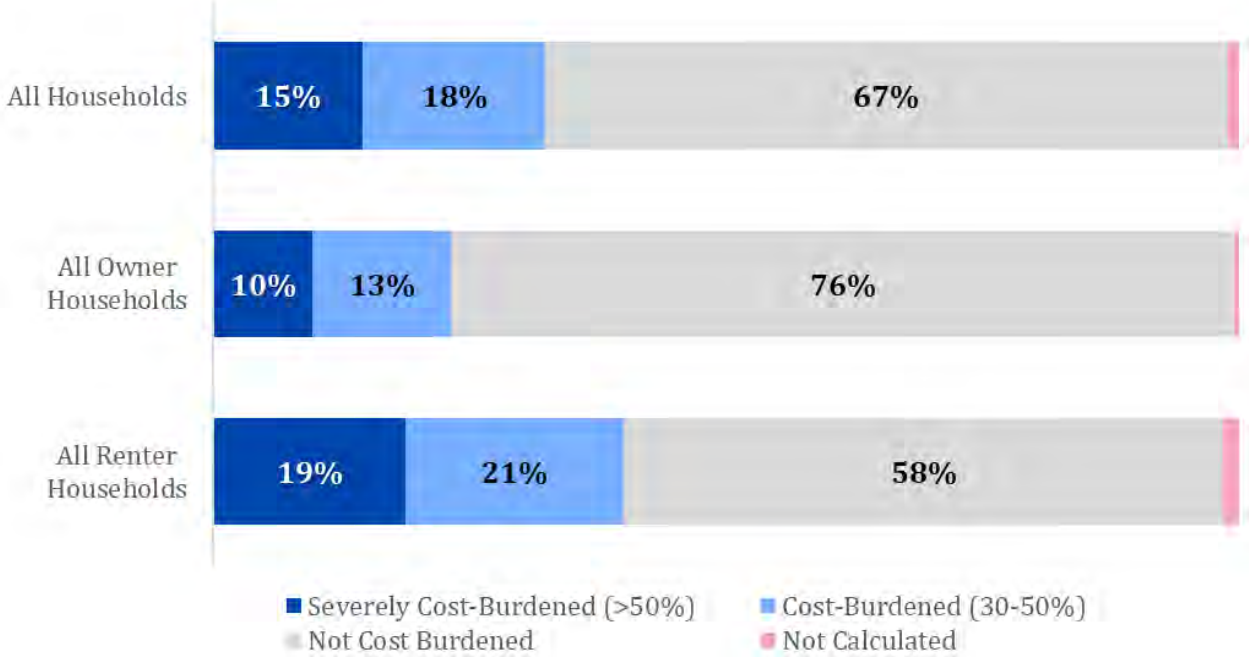
Sources: Seattle OPCD summary of permit completions from Department of Construction and Inspections, Permit Tracking System. Residential Permitting Trends, 2023; BERK, 2023.

Housing Affordability

The affordability of housing depends on two factors: the cost of the housing and the income of the household living there. A broadly used standard considers housing costs that consume 30% or less of a household's income to be affordable. Households paying more than 30% of their gross income for housing costs may have difficulty affording necessities such as food, clothing, transportation, and medical care. HUD considers households to be "cost burdened" if they spend more than 30% of their gross income on housing costs and "severely cost burdened" if they spend more than 50%.

The most recent data about housing cost burden reflects conditions between 2015 and 2019. During that period, about one-third of all Seattle households were cost-burdened, and 15% of all households were severely cost-burdened. Renter households were almost twice as likely to be cost-burdened than owner households, as shown in **Exhibit 3.8-16**.

Exhibit 3.8-16. Proportion of Households by Cost Burden Status and Housing Tenure, 2019



Note: "Not Calculated" refers to households with no or negative income, and therefore degree of cost-burden cannot be calculated.
Sources: US HUD CHAS data, 2015–2019; BERK, 2023.

Rental Housing Affordability

Exhibit 3.8-17 breaks down renter household cost burden by income category. Not surprisingly, households with incomes at or below 50% AMI were most likely to experience cost burden. More than four out of five of these households were cost burdened, including those with no or negative income. Though these very low- and extremely low-income households represent 36% of all households, they represent 70% of cost-burdened households, suggesting substantial need to production and access to affordable housing for this segment of the population.

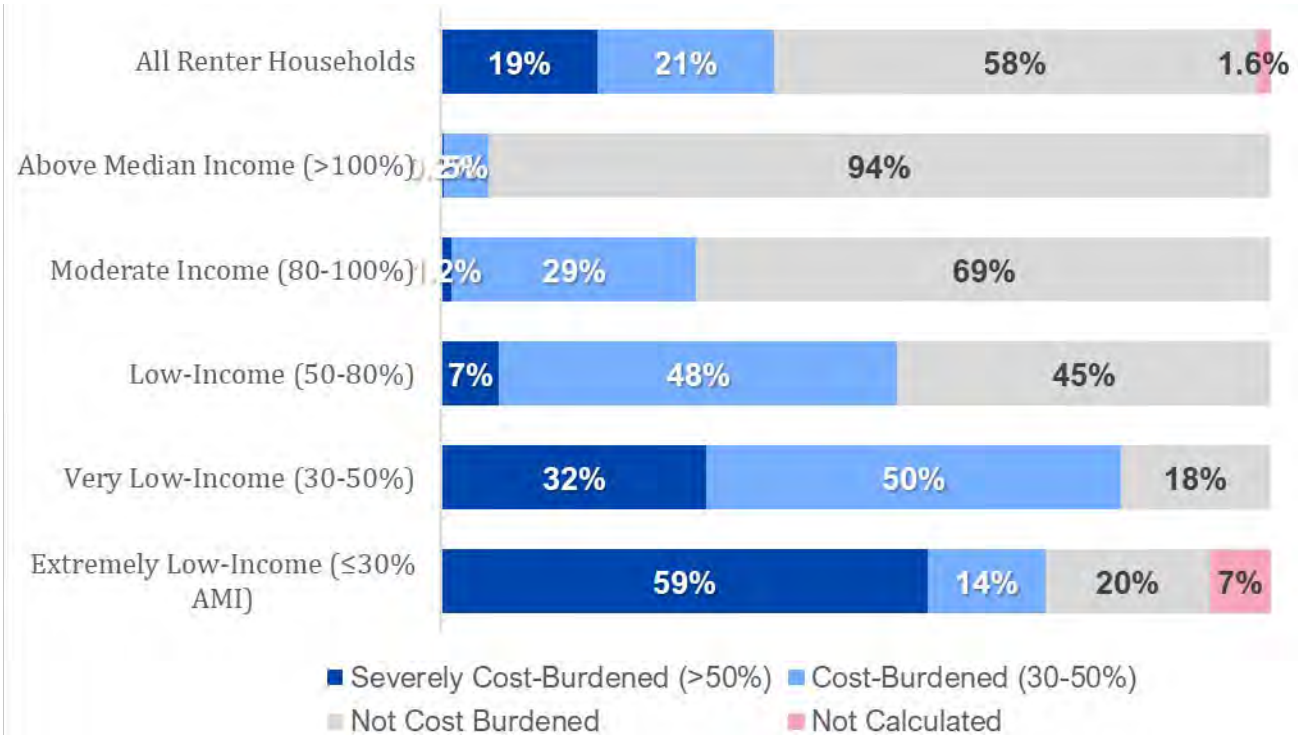
More than half of low-income renter households (50-80% AMI) were cost-burdened, and even in the moderate-income category (80-100% AMI), about a third of renter households experienced cost burden. We can conclude that gaps in affordable rental housing availability exist up to median family income levels. See **Exhibit 3.8-18**.

Exhibit 3.8-17. Renter Households by Income Level and Cost Burden Status, 2019

Income category (% of AMI)	Not cost burdened	Cost burdened (30-50% of income)	Severely cost burdened (>50% of income)	Not calculated	Total households
Extremely low-income (≤30%)	8,110	5,805	23,895	2,955	**40,760**
Very low-income (30-50%)	4,505	12,450	7,970	0	**24,925**
Low-income (50-80%)	9,975	10,655	1,545	0	**22,175**
Moderate-income (80-100%)	12,865	5,475	230	0	**18,570**
Above median income (>100%)	69,540	3,980	155	0	**73,675**
All renter households	**104,995**	**38,365**	**33,795**	**2,955**	**180,105**

Note: "Not calculated" refers to households with no or negative income, and therefore degree of cost-burden cannot be calculated.
Source: US HUD CHAS data, 2015–2019.

Exhibit 3.8-18. Share of Renter Households by Income Level and Cost Burden Status, 2019

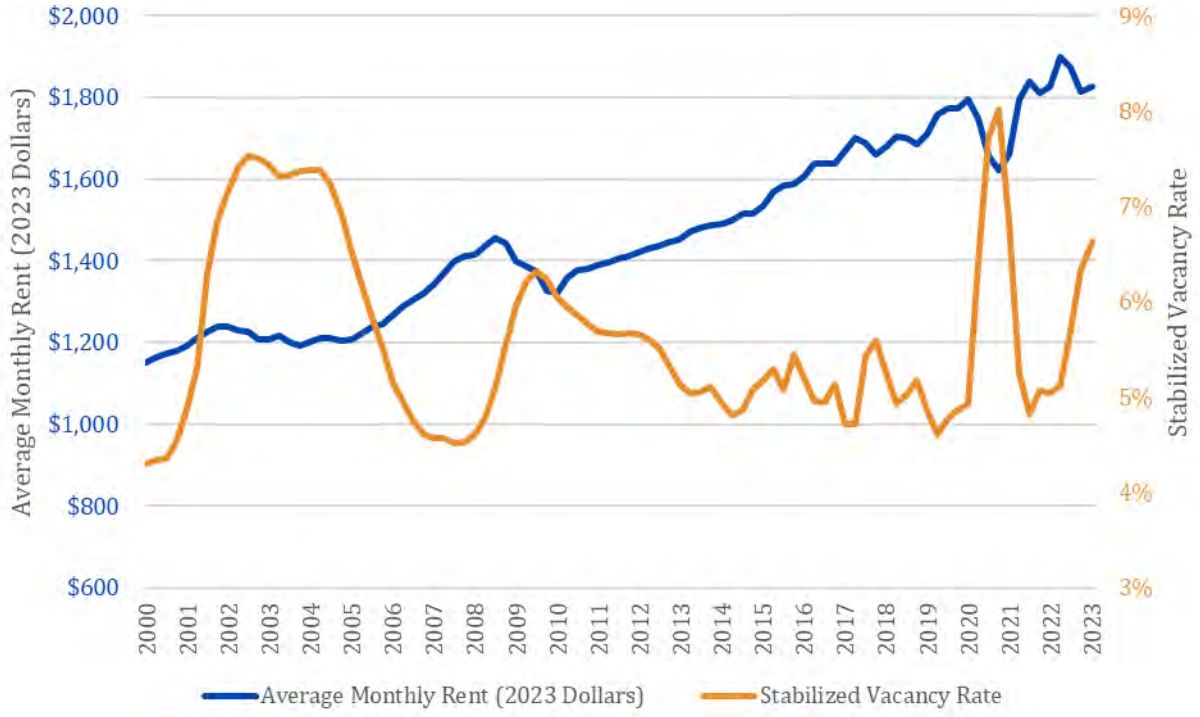


Note: "Not Calculated" refers to households with no or negative income, and therefore degree of cost-burden cannot be calculated.
Source: US HUD CHAS data, 2015–2019; BERK, 2023.

Substantial increases in rents are a key reason for the rise in the share of renter households that are cost burdened. Between 2012 and 2022, average monthly rents rose 32% after adjusting for inflation, from $1,430 to $1,897. Market housing rents typically rise when housing supply is insufficient to meet high demand. In Seattle, high housing demand is being driven in

large part by rapid job growth in Seattle and increased household preferences for in-city living. **Exhibit 3.8-19** shows inflation-adjusted rents in 2023 dollars and the stabilized rate of apartment vacancy.[49] Over the past 23 years, rents have increased most steeply during or slightly after periods when vacancy rates dipped to around 5% or lower. This is visible from 2000 to 2001, 2006 to 2009, 2012 to early 2020, and much of 2021.

Exhibit 3.8-19. Average Monthly Rent and Vacancy Rate, 2000-2022



Note: Rents are adjusted for inflation and are shown in 2023 dollars. The stabilized vacancy rate excludes properties that were still new and in the lease-up stage to ensure the sample is more representative of the full renter housing market.
Sources: CoStar, 2023; BERK, 2023.

Market rents typically vary by the age of the structure. **Exhibit 3.8-20** shows the affordability of apartment rents by age of structure and analysis area, as a percentage of AMI. On average, older apartments are more affordable than newer units. Citywide, the median rent for a one-bedroom apartment in a building constructed before 1994 is affordable at 57% AMI, compared to 86% AMI in newer buildings constructed after 2013.

[49] The stabilized vacancy rate excludes properties that were still new and in the lease-up stage to ensure the sample is more representative of the full rental housing market.

Exhibit 3.8-20. Percent of AMI Needed to Afford a Median Rent for a One-Bedroom Apartment by Year Built and EIS Analysis Area

	Area 1	Area 2	Area 3	Area 4	Area 5	Area 6	Area 7	Area 8	Citywide
All apartments	76%	65%	73%	91%	76%	69%	28%	71%	77%
Built 2013-2023	84%	74%	80%	98%	82%	79%	39%	79%	86%
Built prior to 1994	52%	54%	61%	70%	61%	57%	28%	52%	57%

Note: Percent AMI calculation assumes 1.5 person household, consistent with HUD methodology (Joice 2014).
Source: CoStar, 2023; City of Seattle, 2023; BERK, 2023.

Ownership Housing Affordability

Homeownership costs are far out of reach for the vast majority of Seattle and King County households. Most owner households in Seattle live in detached homes, the median sales price of which was $1,060,000 in 2022, as shown in **Exhibit 3.8-21**. Assuming a 20% down payment ($212,000)—which already excludes many households lack these resources—a household needs an annual income of at least $261,499 to afford this median-priced home. For a four-person household this is equivalent to 194% of AMI. A lower down payment would increase the income necessary to afford such a home.

Exhibit 3.8-21. Summary of Detached and Townhouse Sales Prices, 2022

	75th percentile sales price	Median sales price	25th percentile sales price	Average number of bedrooms	Assumed household size for AMI	Household Income required to purchase median home (% AMI)
Detached homes	$1,495,000	$1,060,000	$835,000	3.31	4	194%
Townhouses	$975,000	$816,250	$709,950	2.65	3	166%

Note: Affordability estimates assume 20% down payment and assumed household size. For households who lack the 20% down payment, the percentage of AMI needed to buy the home would be higher.
Sources: King County Assessor, 2023; City of Seattle, 2023.

The cost of housing varies by age. **Exhibit 3.8-22** shows the average affordability of detached homes by age of structure and analysis area as a percentage of AMI. The lowest value is for older homes (built before 1994) in Area 7, where the median sales price is equivalent to 122% of AMI. While older homes cost less than newer homes, in no area of the city is an older median value detached home affordable for a moderate-income household (80-120% AMI).

Exhibit 3.8-22. Percentage of AMI Needed to Afford a Median-Price Detached Home by Year Built

	Area 1	Area 2	Area 3	Area 4	Area 5	Area 6	Area 7	Area 8	Citywide
All detached homes	202%	202%	284%	276%	280%	163%	117%	155%	194%
New homes (built 2013-2023)	343%	312%	454%	237%	367%	227%	169%	209%	299%
Older homes (built before 1994)	192%	187%	264%	277%	257%	155%	110%	147%	182%

Note: Affordability level calculation assumes availability of a 20% down payment and 4-person household. For households who lack the 20% down payment, the percentage of AMI needed to buy the home would be higher.
Sources: King County Assessor, 2023; City of Seattle, 2023; BERK, 2023.

About 9% of Seattle's housing stock are condominiums that can also provide homeownership options. Most condominiums are in multifamily buildings similar to apartments. In 2022, the median sales price for this type of condominium in Seattle was $512,500. A household would need an annual income of at least $126,432 to afford this condo, assuming availability of a 20% down payment ($102,500). For a two-person household, this is equivalent to 117% of AMI.[50] Households that do not have $102,500 for a down payment would require higher income to afford the median-priced condo.

In recent years many new detached homes have included one or two accessory dwelling units on the same lot. These principal and accessory units are sometimes sold separately as a condominium units. In this study, these kinds of condominiums are referred to as non-stacked housing to differentiate them from condominiums that are stacked vertically in multistory buildings. **Exhibit 3.8-23** summarizes all non-stacked condominium units sold in 2022 by unit size. The affordability of these units is closely correlated with unit size, though even the 25th percentile sales price for small units was not affordable to moderate-income households.

[50] Since income thresholds are adjusted for household size, a smaller household (e.g., 1 or 2 people) would require a greater percentage of AMI to afford this purchase price.

Exhibit 3.8-23. Summary of Non-Stacked Homes Sold in 2022 by Unit Size

	Over 2,000 Sq. Ft.	>1,200-2,000 Sq. Ft.	≤1,200 Sq. Ft.
Number of units sold	378	111	114
Average sale price	$1,987,014	$1,044,382	$754,627
Average size (square feet)	3,114	1,624	995
Average number of bedrooms	3.96	3.05	2.10
Assumed household size for affordability analysis	4	4	3
75th percentile sales price	$2,499,999	$1,200,000	$825,000
Median sales price	$1,800,000	$981,000	$757,500
25th percentile sales price	$1,400,000	$787,950	$678,713
Household income required to purchase median home (% AMI)			
75th percentile sales price	458%	220%	168%
Median sales price	330%	180%	154%
25th percentile sales price	**257%**	**144%**	**138%**

Note: Affordability level calculation assumes availability of a 20% down payment and assumed household size. For households who lack the 20% down payment, the income needed to buy the home would be higher.
Sources: King County Assessor, 2023; City of Seattle, 2023; BERK, 2023.

The housing costs of many owner households exceeds HUD's definition of affordability. As shown in **Exhibit 3.8-24,** more than 35,000 owner-occupied households were cost burdened between 2015 and 2019,nearly a quarter of all owner-occupied households in Seattle. A much larger share of lower-income owner-occupied households experienced housing cost burden than households with incomes above AMI.

Exhibit 3.8-24. Owner-Occupied Households by Cost Burden Status, 2019

Income category (% of AMI)	Not cost burdened	Cost burdened (30-50% of income)	Severely cost burdened (>50% of income)	Not calculated	Total households
Extremely low-income (≤30%)	1,325	1,670	6,625	815	10,435
Very low-income (30-50%)	4,090	2,970	4,225	0	11,285
Low-income (50-80%)	6,260	3,225	1,825	0	11,310
Moderate-income (80-100%)	6,730	3,825	1,025	0	11,580
Above median income (>100%)	97,355	8,775	990	0	107,120
All owner households	**115,760**	**20,465**	**14,690**	**815**	**151,730**

Note: "Not calculated" refers to households with no or negative income, and therefore degree of cost-burden cannot be calculated.
Source: US HUD Comprehensive Housing Affordability Strategy (CHAS) data, 2015–2019.

Displacement

Displacement refers to a process wherein households are compelled to move from their homes involuntarily due to the termination of their lease, rising housing costs, or other factors. This is a different phenomenon than when a household voluntarily makes a choice to move from their home. Three kinds of displacement are occurring in Seattle. Physical displacement is the result of eviction, acquisition, rehabilitation, or demolition of property, or the expiration of covenants on rent- and income-restricted housing. Economic displacement occurs when residents can no longer afford rising rents or the costs of homeownership like property taxes. Cultural displacement occurs when residents are compelled to move because the people and institutions that make up their cultural community have left or are leaving the area.

The City has some data related to the physical displacement of lower income households with incomes earning up to 50% of AMI. Economic displacement is much more difficult to measure directly. Analysis of census data can provide important insights and a sense of the extent of displacement that is likely occurring. No formal data currently exists to measure cultural displacement quantitatively, despite signs that it is occurring in some neighborhoods. Previous studies have examined changes in cultural populations over time at a neighborhood level, like the sustained and significant loss of Black residents in the Central Area (Seattle OPCD, 2016; City of Seattle, 2017), and more recent data suggests that these trends are continuing. These phenomena are interrelated, and cultural displacement can result from and accelerate physical and/or economic displacement, with root causes in the rising cost of housing and real estate and income and wealth inequality.

Physical Displacement

Various circumstances can cause physical displacement. These circumstances include demolition of existing buildings to enable the construction of new buildings on the same site, rehabilitation of existing buildings, and expiration of rent restrictions. Strong demand for housing can encourage demolition to create new housing and the rehabilitation of existing buildings to attract higher-income tenants. Between 2015 and 2022, an average of 629 housing units were demolished each year.[51] However, not all demolitions resulted in the displacement of a household. For example, in some cases the owner-occupant of a home chose to sell the home to a developer or demolished it themselves to build a larger home.

The best data available about households that experienced physical displacement in Seattle comes from records of households eligible for tenant relocation assistance.[52] Seattle's Tenant

[51] Source: City of Seattle Department of Construction and Inspections, Permit Tracking System, 2023. Note that this data underestimates total demolition because some demolition permits never get "finaled" despite the demolition occurring. So, the permit ultimately expires without being counted.

[52] Not all households eligible for relocation assistance complete the TRAO application process. Factors complicating the process to complete a TRAO application may include language barriers or mental health. Data on the rate at which TRAO-eligible households complete the application process is not available. It should also be noted that TRAO data does not include all instances of eviction. Therefore, eviction as a cause of physical displacement is beyond the scope of this analysis. Furthermore, no information is available regarding what portion of households receiving TRAO are able to find other housing in the neighborhood or city. However, it is likely that many households displaced from a building also leave the neighborhood or city.

Relocation Assistance Ordinance (TRAO) requires developers to pay relocation assistance to tenants with incomes at or below 50% of AMI who must move because their rental will:

- Be torn down or undergo substantial renovation
- Have its use changed (for example, from apartment to a commercial use or a nursing home)
- Have certain use restrictions removed (for example a property is no longer required to rent only to low-income tenants under a Federal program)

Between 2015 and 2022, 1,200 households were eligible to receive assistance through TRAO, as shown in **Exhibit 3.8-25**. This was about 171 households per year on average, or about 2.6 out of every 1,000 renter households with incomes at or below 50% AMI.[53] Just over half of these displacements were due to the demolition of a housing unit, with substantial rehabilitation being the next most common cause.

Exhibit 3.8-25. Cause of Displacement among TRAO-Eligible Households, 2015-2022

EIS Analysis Area	Demolition	Substantial rehabilitation	Removal of use restrictions or change of use	Total
Area 1	126	77	—	203
Area 2	171	87	67	325
Area 3	56	49	1	106
Area 4	27	27	16	70
Area 5	113	126	16	255
Area 6	34	52	—	86
Area 7	16	15	—	31
Area 8	77	47	—	124
Total	**620**	**480**	**100**	**1,200**
% of total	**52%**	**40%**	**8%**	

Sources: Seattle Department of Construction & Inspections, 2023; BERK, 2023.

On average, about 14% of units demolished each year result in a TRAO-eligible displacement.[54] However, TRAO records do not cover every instance of physical displacement caused by demolition of a rental unit. For example, the program does not track displacement of households with incomes above 50% of AMI. In addition, until recently the program did not have mechanisms to deter developers from economically evicting tenants prior to applying for a permit to avoid paying relocation benefits, nor did it provide additional assistance to ensure households with language or other barriers can successfully navigate the application process.

[53] Source: US HUD Comprehensive Housing Affordability Strategy (CHAS) data, 2015-2019; BERK, 2023.
[54] Source: City of Seattle Department of Construction and Inspections, Permit Tracking System, 2023 and BERK calculations. Note that permit data underestimates total home demolition because some demolition permits never get "finaled" despite the demolition occurring. So, the permit ultimately end up expiring and not being counted. Therefore, the percent~~%~~age of demolished units that result in TRAO-eligible displacement is likely to be lower.

Finally, this data does not reflect the physical displacement of SHA tenants who receive relocation benefits outside of the TRAO process, generally relating to the redevelopment of public housing.

Economic Displacement

As discussed in the housing affordability section, market-rate housing costs are largely driven by the interaction of supply and demand in the regional housing market. Lower-income households living in market-rate housing are at greater risk of economic displacement when housing costs increase. This vulnerability disproportionately impacts households of color, whose incomes tend to be lower compared to non-Hispanic white households, as shown in **Exhibit 3.8-9**. This is particularly true for Black and Indigenous households, which have the lowest median household income among all major racial and ethnic groups. These disparities are rooted in the history described earlier of redlining, racially restrictive covenants, and other forms of discrimination that contributed to racialized housing patterns and long-lasting wealth inequality. This history, the economic disparities that remain to this day, and racial bias in the real estate, finance, and development systems together result in greater risks of economic displacement among communities of color (Seattle OPCD, 2016).

At the citywide scale, new housing development is critical for addressing Seattle's housing shortage. Increasing housing supply reduces the upward pressure on housing costs that otherwise results when a growing population competes for a finite number of homes. Given Seattle's historic underproduction of housing relative to demand and population growth, a substantial expansion of housing supply is necessary to address economic displacement pressures.

At a neighborhood level, however, the relationship between new development and displacement pressure is less straightforward and can vary in different types of neighborhoods. Growth can increase housing choices and support creation of income-restricted affordable housing, both of which make a neighborhood more accessible to low- and moderate-income households, particularly in areas where housing costs are very high and access has historically been limited for lower-income households and households of color. However, development can also contribute to economic displacement pressure at a local scale if new housing increases the desirability of a neighborhood, attracts higher-income households and businesses catering to them, and rents and home prices rise as a result.

The City has previously examined the historical relationship at a neighborhood scale between housing growth and changes in low-income households (Appendix M of Mandatory Housing Affordability Final EIS). This section presents an updated version of this statistical analysis, which compares the amount of market-rate housing production in a Seattle census tract between 2010 and 2017 to the gain or loss of households at a particular income level in that census tract during that time. For each income level, **Exhibit 3.8-26** presents correlation coefficients that represent the strength of the relationship between market-rate housing production and the change in households. Market-rate housing production is calculated as total net housing units permitted between 2010 and 2017 minus income-restricted affordable housing built during that period. Coefficients have a range of -1 to 1. The closer the coefficient

value is to 1 or -1, the stronger the relationship, while coefficients closer to 0 have a weaker relationship. For instance, a value of ±0.7 indicates a strong relationship between variables. A value of ±0.5 indicates a moderate relationship. A value of ±0.3 indicates a weak relationship.

Exhibit 3.8-26. Correlation between Market-Rate Housing Production and Changes in Households by Income Level, 2010-2017

Household income	Correlation coefficient
0-30% AMI	0.12
0-50% AMI	0.22
0-60% AMI	0.18
0-80% AMI	0.19
50-80% AMI	-0.03
60-80% AMI	0.03
80-120% AMI	0.45
>120% AMI	0.81

Sources: HUD CHAS (based on ACS 5-year estimates 2008-2012 and 2005-2019); City of Seattle, 2023; King County, 2023

Overall, **Exhibit 3.8-26** and the scatterplot of the same data shown in **Exhibit 3.8-27** show that housing production tends to have a weak positive relationship with changes in low-income households at the neighborhood scale. This means that census tracts with relatively higher market-rate housing production during the 2010-2017 period were somewhat more likely than tracts with less housing production to retain or gain low-income households. The strength of this relationship varies when looking at specific income bands. For example, when focusing on households with incomes of 50-80% AMI, there is essentially no statistically significant relationship (positive or negative) between housing production and change in the number of these households between 2010 and 2017 (see **Exhibit 3.8-28**). This suggests that factors other than housing production may be affecting Seattle's ability to retain households at this income level.

Exhibit 3.8-27. Correlation between Market-Rate Housing Production and Changes in Households with Incomes of 0-50% of AMI, 2010-2017

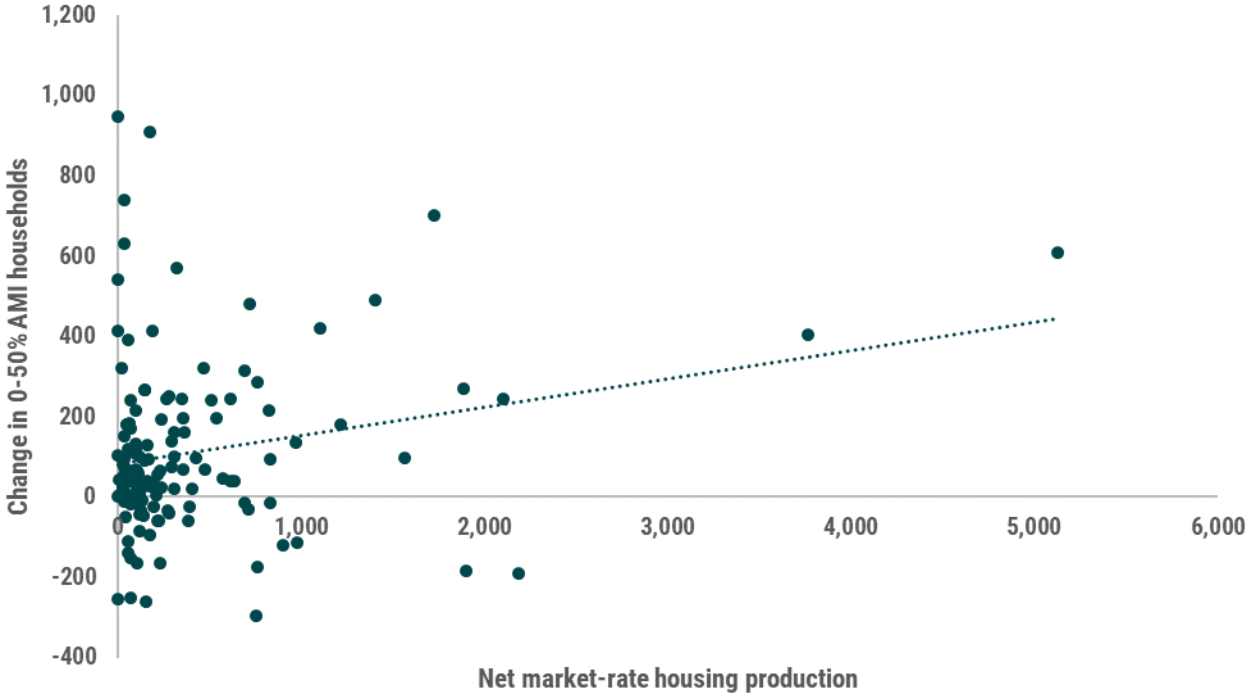
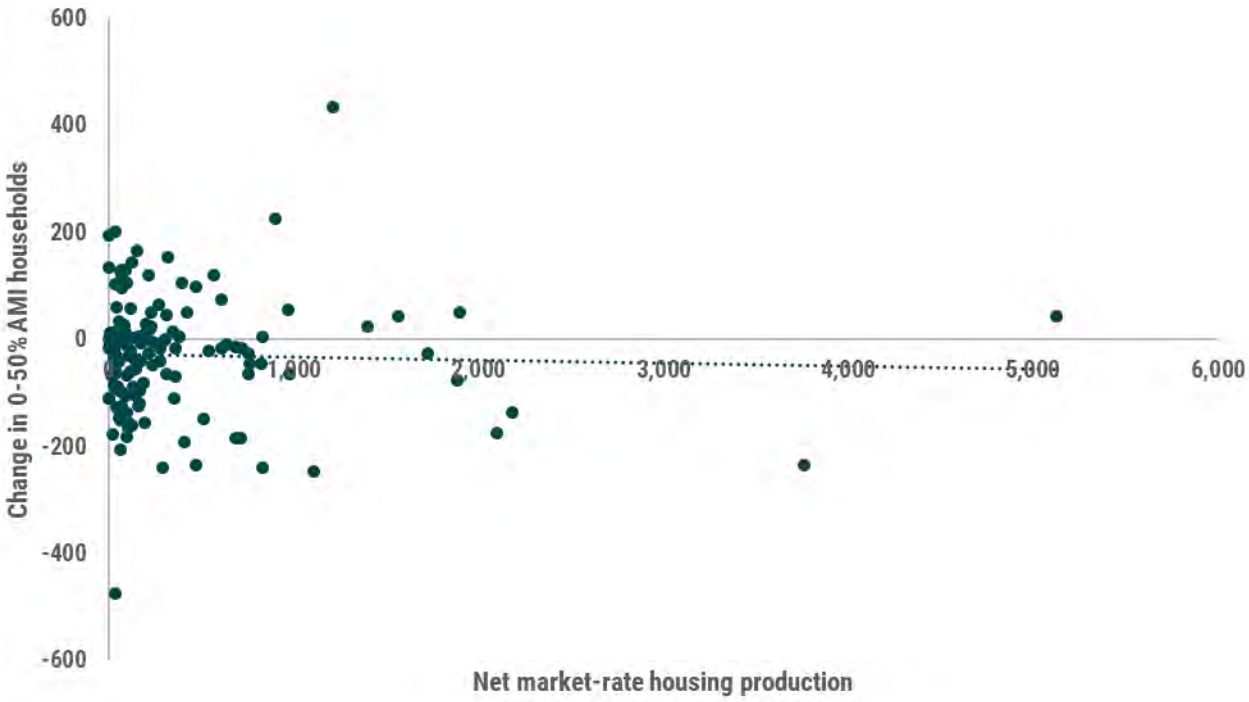


Exhibit 3.8-28. Correlation between Market-Rate Housing Production and Changes in Households with Incomes of 50-80% of AMI, 2010-2017



For middle- and higher-income households, market-rate housing production unsurprisingly has a strong positive correlation. This underscores that much of Seattle's new housing stock is relatively more affordable to and most directly serves relatively higher-income households. Overall, this historical analysis affirms previous findings that net market-rate housing production has not been associated with a loss of low-income households at a census tract level.

Cultural Displacement

Cultural displacement is even more challenging to quantify than physical and economic displacement. Because cultural displacement is caused by a confluence of factors and is driven by decisions about belonging and community, it is not practical to quantify the extent to which it is occurring. However, conversations with current and former residents of Seattle reveal that it is occurring. The City does track changes in population by race and ethnicity. While this information does not track the movement of individual households or why they might be moving, it can identify overall population shifts. The most current data available shows that, while the overall number of people of color in Seattle increased between 2010 and 2020 in absolute terms and as a percentage of Seattle's total population, the increase has been slower than in the rest of King County, and some racial and ethnic groups grew more slowly than others or lost population (see **Exhibit 3.8-29**). The Black population grew less than seven percent in Seattle but more than 40% in the remainder of King County. Populations that decreased or grew more slowly could reflect the impacts of physical displacement, economic displacement, and/or other factors. The physical or economic displacement of members of a community can also precipitate the cultural displacement of other members of the same community.

Exhibit 3.8-29. Change in Racial and Ethnic Composition of Seattle and Remainder of King County, 2010-2020.

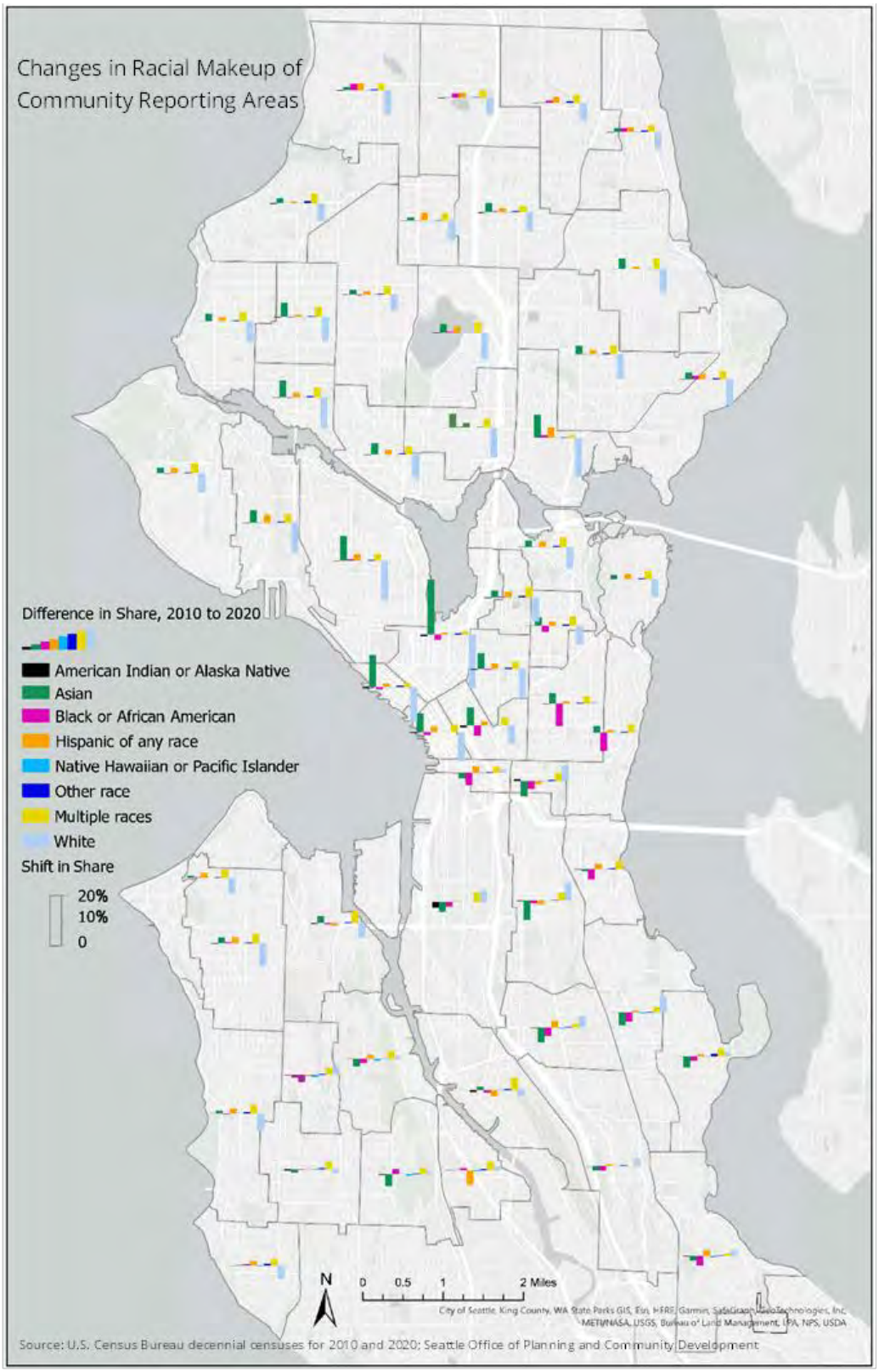
	Seattle		Remainder of King County	
	2010 to 2020 Growth	2020 Population	2010 to 2020 Growth	2020 Population
Total population	21.1%	737,015	15.9%	1,532,660
People of Color	45.7%	298,847	55.9%	740,240
Black	6.6%	50,234	41.0%	97,597
Native American	-15.8%	3,268	49.3%	8,542
Asian	49.3%	124,696	65.4%	325,033
Pacific Islander	-13.6%	1,941	47.7%	17,458
Another race	205.5%	4,473	181%	9,065
Two or more races	102.4%	53,672	88.8%	100,087
Hispanic/Latino, of any race	50.2%	60,563	38.2%	182,458
White	8.6%	438,168	-6.5%	792,420

Sources: Decennial Census estimates, U.S. Census Bureau

Exhibit 3.8-30 shows neighborhood-level change in the racial and ethnic composition in Seattle between 2010 and 2020. Notable changes include a pronounced decline in the Black or African American population share in the Central Area, reduction in the Asian population share in Beacon Hill and marked increase in South Lake Union and Belltown, and a lower Hispanic/Latino population share in South Park.

The neighborhoods in **Exhibit 3.8-30** are Community Reporting Areas (CRAs), groupings of census tracts the City uses to track population trends over time. Identifying demographic change at this scale is valuable given the historical and ongoing importance of certain neighborhoods to the development and preservation of some of Seattle's non-white cultural communities. Many of these communities originated during various phases of population growth, starting in the 19th century, as people migrated and immigrated to Seattle and established businesses and cultural organizations that drew others to those areas. During the 20th century, racially restrictive real estate covenants and redlining combined to further consolidate these communities. While this reduced access to housing and contributed to gaps in generational wealth along lines of race, it also spurred the creation of neighborhoods, networks, and institutions that specifically met the needs of some of Seattle's communities of color. Examples of culturally significant neighborhoods in Seattle include, among others, the Central District as a hub of Seattle's Black community; Chinatown–International District as a cultural hub for several Asian and Asian-American communities; much of Rainier Valley, which has concentrations of businesses and institutions owned by and serving immigrant and refugee communities; and South Park, which has become Seattle's largest Hispanic/Latinx community in recent decades. Some communities arise around communities with other shared identity, including the LGBTQ+ community in Capitol Hill, where change over time may be harder to measure with quantitative data sources. Finally, Native and Coast Salish people may view the natural environment overall, as well as specific locations and the Seattle region broadly, as places of cultural and historical importance.

Exhibit 3.8-30. Change in Racial and Ethnic Composition, 2010-2020

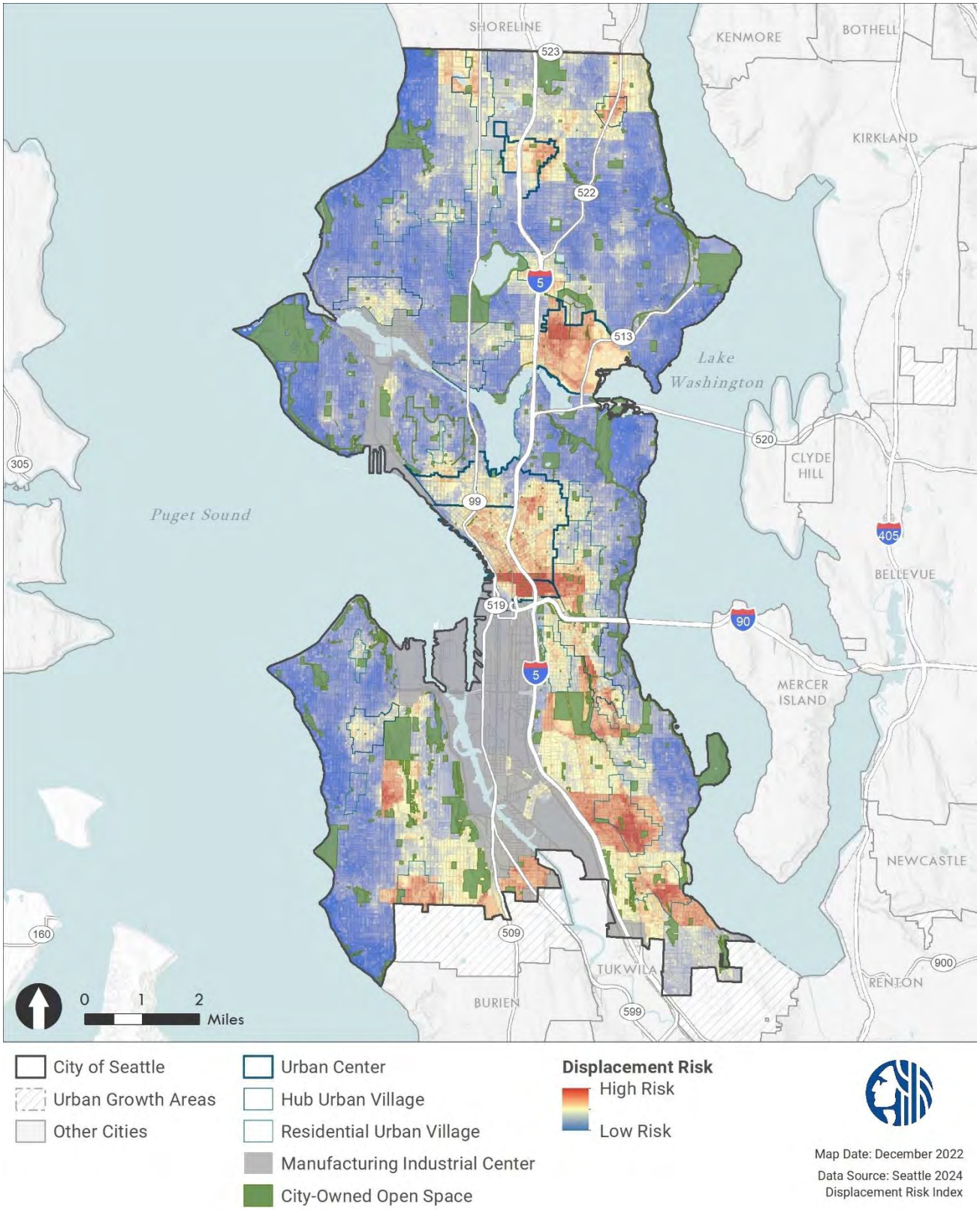


Source: City of Seattle, 2023.

Displacement Risk Index

Not all households are equally vulnerable to displacement pressure, and the factors that contribute to displacement risk are not equitably distributed throughout the city. Therefore, the City in 2016 developed in 2022 updated a Displacement Risk Index (shown in **Exhibit 3.8-31**) to identify where displacement of people of color, low-income people, renters, and other vulnerable populations may be more likely. The Displacement Risk Index provides a longer-term view of displacement risk based on neighborhood characteristics like the presence of vulnerable populations, rent and market factors, and infrastructure and amenities that tend to increase real estate demand. Neighborhoods with the highest displacement risk in Seattle include the Chinatown–International District, Central District, Rainier Valley, Rainier Beach, South Park, High Point, and the University District.

Exhibit 3.8-31. Seattle Displacement Risk Index, 2022

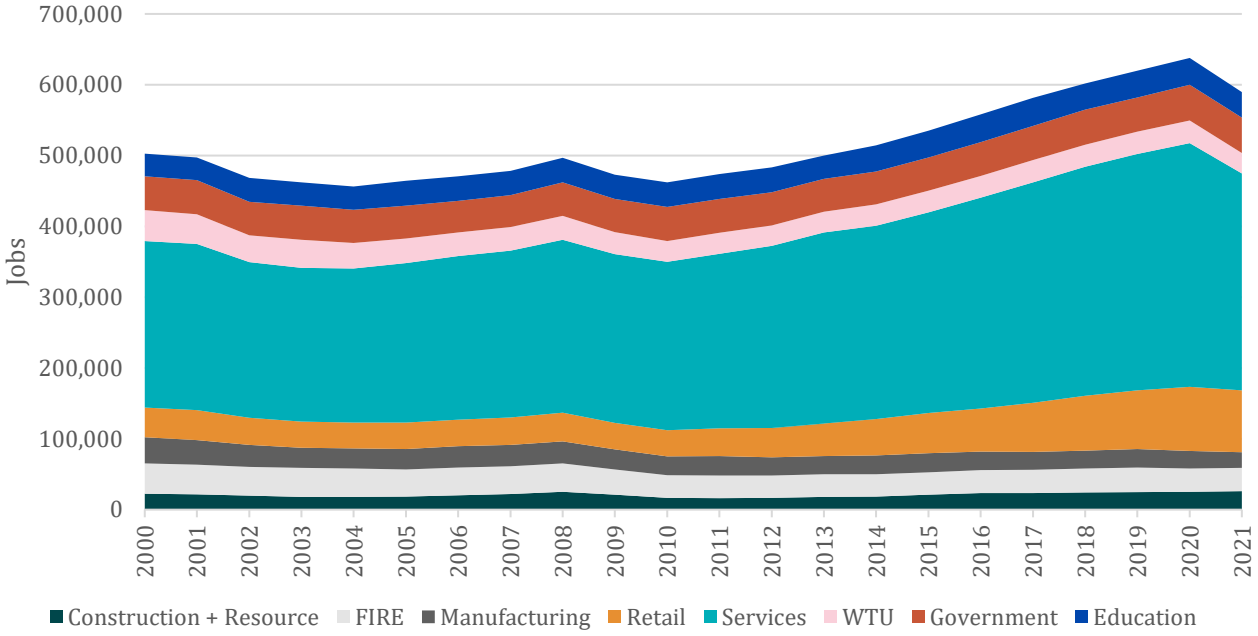


Sources: City of Seattle, 2022; BERK, 2023.

Employment

Between 2010 and 2020 Seattle experienced a rapid period of job growth, as shown in **Exhibit 3.8-32**. Much of that net growth was among services and retail sector jobs. As of March 2021, Seattle had 589,793 jobs, following a steep decline from the pre-pandemic peak in March 2020.

Exhibit 3.8-32. Seattle Employment by Sector, 2000-2021

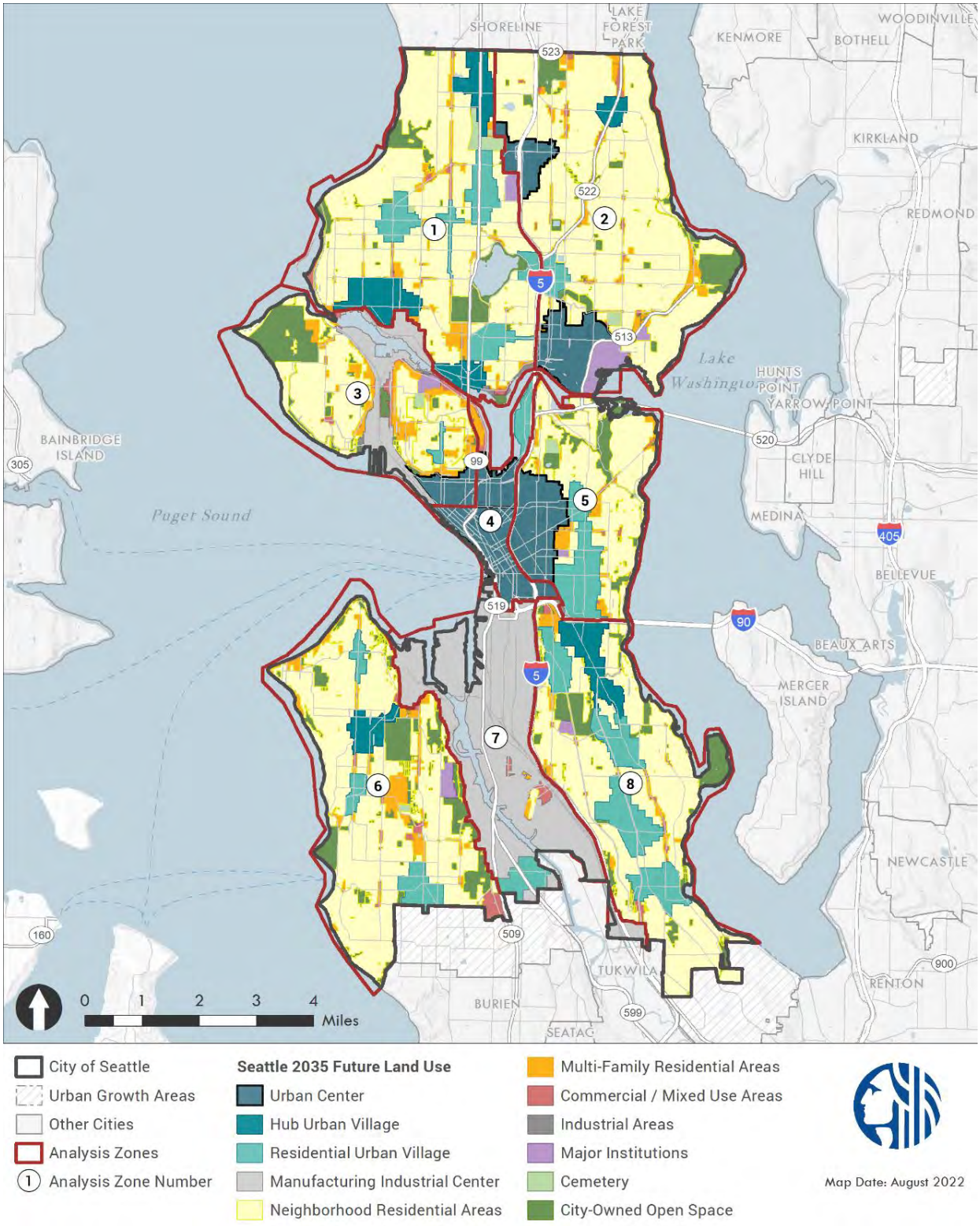


Sources: PSRC Covered Employment Estimates, 2022; BERK, 2023.

Analysis Areas

This section describes the unique population, employment, and housing characteristics of each analysis area. A map of the analysis areas is shown in **Exhibit 3.8-33**. This is followed by demographic and housing related statistics for each area in **Exhibit 3.8-34**, **Exhibit 3.8-35, Exhibit 3.8-36**, **Exhibit 3.8-37**, and **Exhibit 3.8-38.** The descriptions of each analysis area that follow refer to statistics in these exhibits as well as the displacement risk map in **Exhibit 3.8-31**.

Exhibit 3.8-33. EIS Analysis Areas



Note: See **Exhibit 2.1-1** in **Chapter 2** for a cross-walk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~A~~lternatives ~~2–5~~.
Sources: City of Seattle, 2022; BERK, 2022.

Exhibit 3.8-34. Demographics and Selected Household Characteristics by EIS Analysis Area

	Area 1	Area 2	Area 3	Area 4	Area 5	Area 6	Area 7	Area 8	Citywide
Total population	153,131	146,658	69,681	63,803	106,416	95,061	9,726	92,539	737,015
% People of color	28.8%	40.5%	31.4%	50.8%	38.4%	34.3%	52.4%	67.6%	40.5%
American Indian or Alaska Native, Non-Hispanic	0.4%	0.4%	0.4%	0.6%	0.4%	0.5%	1.2%	0.4%	0.4%
Asian, Non-Hispanic	10.1%	18.9%	13.0%	29.9%	13.7%	9.3%	14.3%	30.9%	16.9%
Black or African American, Non-Hispanic	2.9%	4.8%	2.6%	6.4%	7.8%	6.6%	8.5%	19.0%	6.8%
Hispanic of Any Race	7.0%	7.9%	7.5%	7.4%	8.2%	9.2%	19.6%	9.5%	8.2%
Native Hawaiian or Pacific Islander, Non-Hispanic	0.2%	0.2%	0.2%	0.2%	0.2%	0.4%	0.7%	0.4%	0.3%
Other, Non-Hispanic	0.6%	0.6%	0.6%	0.6%	0.6%	0.6%	0.6%	0.6%	0.6%
Two or More Races, Non-Hispanic	7.7%	7.6%	7.1%	5.7%	7.4%	7.7%	7.5%	6.8%	7.3%
White, Non-Hispanic	71.2%	59.5%	68.6%	49.2%	61.6%	65.7%	47.6%	32.4%	59.5%
Total population under 18 years	15.5%	15.4%	14.4%	4.9%	9.7%	18.3%	14.2%	19.8%	14.5%
Total households	74,815	54,901	34,227	36,389	55,466	42,679	2,076	36,808	337,361
% owner households	48%	50%	45%	19%	34%	60%	45%	58%	45%
% renter households	52%	50%	55%	81%	66%	40%	55%	42%	55%
Average household size	2.10	2.36	1.88	1.52	1.81	2.25	2.38	2.61	2.08

Source: City of Seattle analysis of U.S. Census 2020; American Community Survey 5-Year Estimates (2017-2021): S1101 Households and Families; and American Community Survey 5-Year Estimates (2017-2021): B25012 Tenure by Families and Presence of Own Children.

Exhibit 3.8-35. Demographics of Neighborhood Residential (NR) Zones by EIS Analysis Area

	Area 1	Area 2	Area 3	Area 4	Area 5	Area 6	Area 7	Area 8	Citywide
Population in NR zones	76,063	75,728	27,918	1,110	26,729	54,283	1,196	49,769	312,796
% Total population in NR zones	50%	52%	40%	2%	25%	57%	12%	54%	42%
People of color as % of NR population	24%	31%	24%	27%	28%	30%	47%	63%	33%
People of color as % of population *outside* NR zones	33%	51%	37%	51%	42%	40%	53%	73%	46%

Notes: Neighborhood Residential zones are determined by the City of Seattle and zoned primarily for detached homes.
Source: City of Seattle analysis of U.S. Census 2020; American Community Survey 5-Year Estimates (2017-2021): S1101 Households and Families; and American Community Survey 5-Year Estimates (2017-2021); BERK, 2023.

Exhibit 3.8-36. Average Rent and Rental Affordability by EIS Analysis Area

	Area 1	Area 2	Area 3	Area 4	Area 5	Area 6	Area 7	Area 8	Citywide
Average rent, 1-bedroom apartment	$1,912	$1,635	$1,854	$2,301	$1,911	$1,737	$715	$1,791	$1,940
Affordability of 1-bedroom apartment (% AMI)	76.0%	65.0%	73.0%	91.0%	76.0%	69.0%	28.0%	71.0%	77.0%

Sources: CoStar, 2023; City of Seattle, 2023; BERK, 2023.

Exhibit 3.8-37. Housing Units by Type by EIS Analysis Area

	Area 1	Area 2	Area 3	Area 4	Area 5	Area 6	Area 7	Area 8	Citywide
Total housing units	79,576	64,581	36,514	52,062	70,170	46,500	2,287	39,704	391,394
Total detached homes	32,371	29,712	11,207	451	12,445	24,905	1,212	22,183	134,486
% detached homes	41%	46%	31%	1%	18%	54%	53%	56%	34%
Total multifamily homes	47,205	34,869	25,307	51,611	57,725	21,595	1,075	17,521	256,908
% multifamily homes	59%	54%	69%	99%	82%	46%	47%	44%	66%

Sources: King County Department of Assessments, compiled by City of Seattle, July 2022.

Exhibit 3.8-38. Displaced TRAO-Eligible Households by EIS Analysis Area

	Area 1	Area 2	Area 3	Area 4	Area 5	Area 6	Area 7	Area 8	Citywide
Total renter households	38,577	27,317	18,795	29,450	36,785	17,197	1,139	15,606	184,866
Total TRAO* displacements, 2015-22	203	325	106	70	255	86	31	124	1,200
TRAO displacement rate (annual per 10,000 renter households)	8	17	8	3	10	7	39	11	9

Sources: Seattle Department of Construction & Inspections, 2023; BERK, 2023.

Area 1: Northwest Seattle

Area 1 is in northwest Seattle, including the urban villages of Ballard, Fremont, Wallingford, Greenwood, Bitter Lake, and Aurora–Licton Springs. This area is relatively affluent and less diverse than other parts of Seattle, except the north end of the area, around Bitter Lake and Aurora–Licton Springs, which have higher displacement risk.

Population: Area 1 has a population of 153,131, with half (50%) living in Neighborhood Residential zones. Nearly three-quarters of the population of Area 1 (71%) identifies as White, Non-Hispanic, substantially higher than this proportion citywide (59%). The percentage of Area 1 residents identifying as BIPOC is 29%, much lower than the citywide 41%. This area has a smaller share of residents who identify as Black or Asian, compared to citywide. Fifteen percent of the population of this area is under 18 years old, just above the city average of 14%.

Housing: Area 1 has 79,576 housing units, of which 41% are detached homes and 59% are multifamily. Slightly less than half (48%) of households in Area 1 own their homes, and the average household size is 2.1 people, comparable to the citywide average.

Rental housing costs in Area 1 are the highest in the city outside downtown. The average rent for a 1-bedroom apartment in Area 1 is $1,914, which is affordable for a household whose income is 76% of AMI (see **Exhibit 3.8-20**). Ownership housing costs are slightly higher than the citywide average. A 3-person household needs an income 224% of AMI to afford a median priced detached home, compared to 216% citywide.

Mixed-use and multifamily housing production between 2009 and 2022 was most robust in low displacement risk areas (such as Fremont, Ballard, and Greenwood) and at the junction of Holman Road and Greenwood Avenue. Less new development has occurred in areas with higher displacement risk.

Based on Seattle's TRAO data, at least 203 low-income renter households in Area 1 were displaced between 2015 and 2022, an average annual rate of approximately 8 per 10,000 renter households, close to the average citywide.

Employment: Area 1 is primarily residential but has several urban villages and small sections of industrial activity at its southern border along the Ship Canal. Most jobs are located in and adjacent to that industrial concentration (which continues south across the canal into Area 3), along retail corridors (15th Ave NW, Aurora Ave NW, Greenwood Ave NW, and Holman Road NW), or in services like schools. North Seattle College sits on the eastern border of Area 1, next to the Northgate Urban Center in Area 2.

Area 2: Northeast Seattle

Area 2 comprises northeast Seattle, including the University of Washington (UW) main campus, Seattle Children's Hospital, the University District and Northgate Urban Centers, the Lake City and Roosevelt Urban Villages. The UW area to the south and Northgate and Lake City areas to the north both have moderate to high rates of displacement risk, while the middle section of Area 2, which includes neighborhoods like Maple Leaf, View Ridge, and Laurelhurst, is affluent, more residential, and scores lower on vulnerability to displacement.

Population: One in five Seattle residents live in Area 2. More than half (52%) of its population of 146,658 resides in Neighborhood Residential zones. Approximately 60% of the population of Area 2 identifies as White, Non-Hispanic, and 40% identify as BIPOC, similar to citywide. The population distribution by race is also similar to citywide demographics. Fifteen percent of the population of this area is under 18 years old, just above the city average of 14%.

Housing: Area 2 has 64,581 housing units, of which 46% are detached homes and 54% are multifamily. Area 2 has a homeownership rate of about 50% and an average household size of 2.36 people.

Rental housing costs in Area 2 are somewhat lower than the Seattle average. The average rent for a 1-bedroom apartment in Area 1 is $1,635, which is affordable for a household whose income is 65% of AMI. Ownership housing costs are slightly higher compared to the citywide average. A 3-person household needs an income 224% of AMI to afford a median priced detached home, compared to 216% citywide.

Based on Seattle's TRAO data, at least 325 low-income renter households in Area 2 were displaced between 2015 and 2022, an average annual rate of approximately 17 per 10,000 renter households, nearly double the citywide average of 9.

Employment: Employment centers in Area 2 include the UW main campus and University District, Seattle Children's Hospital, and the urban center surrounding Northgate Mall, as well as the commercial center in the Lake City Urban Village. Most other land in Area 2, however, is large residential areas predominated by detached housing and few services.

130th/145th Station Area

These anticipated stations are a locus of current and anticipated development in Area 2. Currently primarily residential, this sub-area will increasingly serve as a connector between Lake City to the east and Bitter Lake and Aurora–Licton Springs to the west when the light rail stations open in 2024-2025. The residential areas within the half-mile buffer around NE 130th St Station are assessed to have low to moderate displacement risk according to Seattle's Displacement Risk Index (see **Exhibit 3.8-31**). Pockets of the broader Station Area have higher displacement risk: within the Lake City Urban Village, along 15th Ave NE south of NE 130th St, and on the west side of Aurora (SR 99) north of NE 130th St.

Area 3: Queen Anne/Magnolia

Area 3 covers western (but not West) Seattle south of the ship canal but north of downtown. This area includes Magnolia to the west and Queen Anne to the east, split by the Interbay industrial and manufacturing area. The Queen Anne section includes the Upper Queen Anne Urban Village and Uptown (Lower Queen Anne) Urban Center.

Population: Area 3 has a population of 69,681 (approximately 1 in 10 Seattle residents), with slightly less than half (40%) living in Neighborhood Residential zones. Approximately 69% of the population of Area 3 identifies as White, Non-Hispanic, and 31% identify as BIPOC, making it less diverse than the city as a whole. This area has a relatively smaller share of residents who identify as Black or Asian, compared to citywide. The population of this area under 18 years old is similar to the citywide rate at 14%.

Housing: Areas 3 has 36,514 housing units, of which 31% are detached homes and 69% are multifamily. Area 3 has a homeownership rate of about 45% and average household size of 1.88 people, lower than the citywide average of 2.08.

Rental housing costs in Area 3 are slightly lower than the Seattle average. Citywide the average rent for a 1-bedroom apartment is $1,940, versus $1,854 in Area 3, which is affordable for a household whose income is 73% of AMI. Ownership housing costs are substantially higher compared to the citywide average. A 3-person household needs an income 316% of AMI to afford a median priced detached home, compared to 216% citywide.

Based on TRAO data, at least 106 low-income renter households in Area 3 were displaced between 2015 and 2022, an average annual rate of approximately 8 per 10,000 renter households.

Employment: Employment centers in Area 3 include the Ballard–Interbay–North End Manufacturing and Industrial Center; the Uptown Urban Center northwest of Seattle Center; and Seattle Pacific University along the south edge of the ship canal. However, west of Interbay, which bisects Area 3, most of Magnolia is residential and lacks substantial services.

Area 4: Downtown/Lake Union

Area 4 comprises central and downtown Seattle, including the Westlake neighborhood and the Eastlake Urban Village that flank Lake Union and the South Lake Union and Downtown Urban Centers. It also includes the Chinatown International District.

Population: Area 4 has a population of 63,803 (about 9% of the city total), residing primarily in multifamily apartment buildings in the densest part of Seattle. Just 2% live in Neighborhood Residential zones due to the small amount of that zone in Area 4. Compared with other areas, Area 4 has relatively fewer people who identify as White, Non-Hispanic(approximately half of the population of Area 4). Thirty percent identify as Asian alone, nearly double the Seattle average. Many of these Asian residents live in the Chinatown-International District. Approximately half of Area 4 residents identify is BIPOC, significantly higher than the citywide (41%). Few families live in Area 4: only 5% of the population of this area is under 18 years old, around a third of the percentage for Seattle overall (14%).

Housing: Area 4 has 52,062 housing units, of which just one percent are detached homes and 99% are multifamily. Nearly 10% of those apartments are vacant, the highest vacancy rate of any EIS Area. Area 4 also has the highest percentage of renters (4 out of 5 households rent), and the smallest average household size (1.5 people) in the city.

Rental housing costs in Area 4 are the highest in Seattle. The average rent for a 1-bedroom apartment in Area 4 is $2,301, which is affordable only to households with incomes of at least 91% of AMI. Nearly all ownership housing supply is in condominiums in larger multifamily buildings, and the housing cost for this kind of unit is higher than any other area of the city.

Based on TRAO data, at least 70 low-income households in Area 4 were displaced between 2015 and 2022, for an average annual rate of approximately 3 per 10,000 households, markedly lower than elsewhere in the city.

Employment: Area 4 has a high concentration of commercial activity. In addition to corporate and professional offices throughout downtown, Area 4 houses the Seattle's civic campus (City of

Seattle, King County, and other government facilities and offices); Amazon's headquarters in South Lake Union; dining, nightlife, and cultural institutions; hotels and tourist facilities; and downtown and waterfront retail, including the Pike Place Market. While this area has higher job volume and capacity than elsewhere in Seattle, it has been hit especially hard by the COVID-19 pandemic.

Area 5: Capitol Hill/Central District

Area 5 is central and eastern Seattle, including the First Hill/Capitol Hill Urban Center and the Madison–Miller and 23rd & Union–Jackson Urban Villages. This area is more densely populated than most and includes the historic centers of Seattle's Black (Central District) and LGBTQ+ (Capitol Hill) communities.

Population: Area 5 has a population of 106,416 (approximately 14% of Seattle residents), with about 1 in 4 living in Neighborhood Residential zones. About 62% of the population of Area 5 identifies as White, Non-Hispanic and 38% identify as BIPOC, making Area 5 slightly less diverse than citywide. About 8% of residents identify as Black, Non-Hispanic, just slightly higher than the percentage citywide (7%). Only 10% of Area 5 residents are under 18 years old, compared to 10% citywide.

Housing: Area 5 has 70,170 housing units, of which 18% are detached homes and 82% are multifamily, the highest share of multifamily housing outside downtown. Correspondingly, Area 5 has a lower homeownership rate (about 1 in 3 households) than other EIS Areas. The average household has 1.8 people.

Rental housing costs in Area 5 are roughly equal to the Seattle average. The average rent for a 1-bedroom apartment in Area 5 is $1,911, which is affordable for a household whose income is 76% of AMI. Ownership housing costs are substantially higher compared to the citywide average. A 3-person household needs an income 311% of AMI to afford a median priced detached home, compared to 216% citywide.

Based on TRAO data, at least 255 low-income renter households in Area 5 were displaced between 2015 and 2022, an average annual rate of approximately 10 per 10,000 renter households.

Employment: Area 5 is home to much of the city's healthcare institutions (including Swedish, Virginia Mason, and Harborview hospitals) on First Hill, part of an urban center that extends north through Capitol Hill. The 23rd & Union–Jackson Urban Village, which spans much of the historically Black Central District of Seattle, has a few locations with neighborhood serving commercial uses. Neighborhood-serving businesses also exist in parts of Capitol Hill and Madison Valley. Other neighborhoods in Area 5 are predominantly high-cost residential areas with limited services, like Montlake, Leschi, Broadmoor, Madrona, and Portage Bay.

Area 6: West Seattle

Area 6 comprises southwest Seattle, including West Seattle's Admiral, West Seattle Junction, and Morgan Junction Urban Villages and the Westwood–Highland Park Urban Village.

Population: Area 6 has a population of 95,061, of which 57% lives in Neighborhood Residential zones, more than any other EIS Area. More than two-thirds of the population identifies as White, Non-Hispanic, and 38% identify as BIPOC, compared to 41% BIPOC citywide. About 18% of Area 6 residents are under 18 years old, compared to 14% citywide.

Housing: Area 6 has 46,500 housing units, of which 54% are detached homes and 46% are multifamily. At roughly 60%, Area 6 has the highest homeownership rate of any EIS Area. The average household size is 2.25 people, slightly above the citywide average.

Rental housing costs in Area 6 are slightly below the city average. The average rent for a 1-bedroom apartment in Area 6 is $1,737, which is affordable for households whose income is a 69% of AMI. Ownership housing costs are somewhat lower compared to the citywide average. A three-person household needs an income of 181% of AMI to afford a median priced detached home, compared to 216% citywide.

Based on TRAO data, at least 86 low-income renter households in Area 6 were displaced between 2015 and 2022, an average annual rate of approximately 7 per 10,000 renter households.

Employment: Area 6 has limited commercial development overall. The southern portion has access to services at Westwood Village, near Highland Park, and in White Center in unincorporated King County. Many residential areas in West Seattle down to Fauntleroy and Arroyo Heights have limited services. Area 6 is also home to South Seattle Community College.

Area 7: Duwamish

Located in south Seattle between Area 6 to the west and Area 8 to the east, Area 7 comprises primarily industrial-zoned land along the Duwamish river, including Port of Seattle land, the Seattle Intermodal facility (railyard), Boeing Field, the Georgetown neighborhood, and the South Park Urban Village. This area is sparsely populated, with far less residential land than other EIS areas apart from Georgetown and South Park. Given its smaller residential population, statistics about this area are suggestive and less reliable, as small changes in the limited sample could have large effects.

Population: Area 7 has a population of 9,726 (just 1.3% of the City's population), of which about 12% reside in Neighborhood Residential zones. Less than half of the population of Area 7 identifies as White, Non-Hispanic and 52% identify as BIPOC, compared to 41% citywide. Nearly 20% of residents in Area 7 identify as Hispanic or Latino, over double the rate citywide (8%). About 14% of Area 7 residents are under 18 years old, equivalent to the citywide share.

Housing: Area 7 has only 2,287 housing units, of which just over half (53%) are detached homes primarily in South Park. The homeownership rate is 45%, and the average household size is 2.38 people, larger than the Seattle average of 2.08.

Rental housing costs in Area 7 are the lowest in the city. The average rent for a 1-bedroom apartment in Area 7 is $715, which is affordable for household whose income is 28% of AMI, though this data reflects a limited sample, with no newly developed units and only one building

that was substantially rehabilitated between 2013 and 2022. Ownership housing costs are substantially lower compared to the citywide average. A three-person household needs an income of 130% of AMI to afford a median priced detached home, compared to 216% citywide.

Based on TRAO data, at least 31 low-income renter households in Area 7 were displaced between 2015 and 2022, an average annual rate of approximately 39 per 10,000 renter households, more than four times the citywide average.

Employment: Area 7 is primarily industrial, with small commercial clusters in the Georgetown and South Park neighborhoods. Boeing Field / King County International Airport is located in Area 7.

Area 8: Southeast Seattle

Area 8 covers southeast Seattle, including the North Beacon Hill, Mt. Baker, Columbia City, Othello, and Rainier Beach Urban Villages. This area includes some of the most racially diverse neighborhoods in Seattle and is home to mixed-income planned housing developments like Holly Park.

Population: Area 8 has a population of 92,539, similar to Area 6, with 54% living in Neighborhood Residential zones. More than two-thirds of the population identifies as BIPOC. Asian (31%) and Black (19%) identifying residents are overrepresented compared to their shares citywide (17% and 7%, respectively). Almost 20% of Area 8 residents are under 18 years old, the highest rate of any EIS Area.

Housing: Area 8 has 39,704 housing units, of which 56% are detached homes and 44% are multifamily. The homeownership rate is 58%, second only to Area 6. The average household size is 2.61 people, the highest of any EIS Area by a substantial margin.

Rental housing costs in Area 8 are slightly lower than the city average and on par with Area 6 and Area 3 on a per-square-foot basis. The average rent for a 1-bedroom apartment is $1,791, which is affordable for a household whose income is 71% of AMI. Ownership housing costs are somewhat lower compared to the citywide average. A three-person household needs an income 172% of AMI to afford a median priced detached home, compared to 216% citywide.

Based on TRAO data, at least 124 low-income renter households in Area 8 were displaced between 2015 and 2022, an average annual rate of approximately 11 per 10,000 renter households.

Employment: Area 8 has mixed-use and commercial development primarily along the main arterials of Rainier Ave S, Beacon Ave S, and Martin Luther King Jr. Way S. However, large residential areas away from these corridors, including nearly the entire Rainier Beach neighborhood to the south, have limited or no services. Area 8 is also home to the Veterans' Affairs Puget Sound Health Care campus.

3.8.2 Impacts

Impacts Common to All Alternatives

Housing Capacity

As described in **Section 3.7**, changes to the GMA in 2021 added new requirements for jurisdictions to "plan for and accommodate housing affordable to all economic segments of the population of this state." To comply with these requirements, King County identified projected countywide housing needs by income level and allocated these needs down to individual jurisdiction. These allocated housing needs for Seattle are shown above in **Exhibit 3.7-4**.

Washington State Department of Commerce (Commerce) provides guidance for analyzing buildable land capacity for residential development to determine whether there is adequate capacity for housing types that have potential to address housing needs at each income level. The Draft Housing Technical Appendix for the One Seattle Plan details the methodology used to relate individual zones to potential income levels served, consistent with Commerce guidance. **Exhibit 3.8-39** shows the results of this analysis for the No Action Alternative. The zone-based matching approach showed a potential deficit in housing affordable at >80 to 120% of AMI, but a cumulative surplus when considering results of a market analysis[55] indicating that unsubsidized housing development in Zones with 50 to 85 ft. height limits can serve households with incomes >80 to 120% of AMI.

Exhibit 3.8-39. Existing Zoning Compared to Needs by Income Band

Income Level (% AMI) & Special Housing Needs	Projected Housing Need (2019-2044)*	Zone Categories Serving These Needs**	Aggregated Housing Needs	Total Capacity	Discrete Capacity Surplus/Deficit	Cumulative Capacity Surplus
0 - 30%, PSH***	15,024	Zones with 50 to 85 ft. height limits	70,726	94,641	+23,915	+23,915
0 - 30%, Non-PSH	28,572					
> 30 - 50%	19,144					
> 50 - 80%	7,986					
> 80 - 100%	5,422	Zones with < 50 ft. height limits	11,572	7,001	-4,571	+19,344
> 100% - 120%	6,150					
> 120%	29,702	Zones with > 85 ft. height limits, Neighborhood Residential, Residential Small Lot, Lowrise 1 and 2, ADUs	29,702	66,444	+36,742	+56,086
Total	**112,000**		**112,000**	**168,086**	**+56,086**	**+56,086**

Notes: This exhibit is new since the Draft EIS.
*Projected housing needs reflect the period of 2019 through 2044.
**Housing capacity in Industrial zones, primarily limited to caretaker units, not included in affordability analysis.

[55] See One Seattle Plan, Mayor's Proposed Plan, January 2025, Appendix 2 Housing: https://www.seattle.gov/documents/Departments/OPCD/SeattlePlan/OneSeattlePlanMayorsPlanAppendices2025.pdf.

***PSH = Permanent Supportive Housing.
Source: City of Seattle, 2024.

Data to perform this analysis is available for the Preferred Alternative and is presented in **Exhibit 3.8-40**.[56] It shows greater total housing capacity due to the proposed zoning changes. As with the No Action Alternative, there is a discrete capacity deficit in housing affordable at >80 to 120% of AMI, but a cumulative surplus when considering market analysis for unsubsidized housing development in zones with 50 to 85 foot height limits can serve households with incomes >80 to 120% of AMI.

Exhibit 3.8-40. Proposed Zoning Compared to Needs by Income Band

Income Level (% AMI) & Special Housing Needs	Projected Housing Need (2019-2044)*	Zone Categories Serving These Needs**	Aggregated Housing Needs	Total Capacity	Discrete Capacity Surplus/Deficit	Cumulative Capacity Surplus
0 - 30%, PSH***	15,024	Zones with 50 to 85 ft. height limits	70,726	188,004	+117,278	+117,278
0 - 30%, Non-PSH	28,572					
> 30 - 50%	19,144					
> 50 - 80%	7,986					
> 80 - 100%	5,422	Zones with < 50 ft. height limits	11,572	2,459	-9,113	+108,165
> 100% - 120%	6,150					
> 120%	29,702	Zones with > 85 ft. height limits, Neighborhood Residential, Residential Small Lot, Lowrise 1 and 2, ADUs	29,702	140,470	+110,768	+218,933
Total	**112,000**		**112,000**	**330,933**	**+218,933**	**+218,933**

Notes: This exhibit is new since the Draft EIS.
*Projected housing needs reflect the period of 2019 through 2044.
**Housing capacity in Industrial zones, primarily limited to caretaker units, not included in affordability analysis.
***PSH = Permanent Supportive Housing. Source: City of Seattle 2024
Source: City of Seattle, 2024.

In summary, both alternatives have sufficient capacity to meet all requirements under GMA. However, the Preferred Alternative provides additional capacity to support additional housing growth and accommodate a greater diversity of housing needs.

Housing Supply

Seattle's housing supply would continue to increase under all five alternatives. What distinguishes the alternatives is the total amount of housing growth each would accommodate, the distribution of housing growth in different place types across the city, and the types of new

[56] Data is not available to perform this analysis for Alternatives 2-5.

housing likely to unfold in each place type given their zoning. Different kinds of housing can best support different kinds of households due to the size and affordability of units. **Exhibit 3.8-41** summarizes the amount and type of housing likely to be developed under each alternative. These projections are based on the amount of housing growth expected in each place type (detailed in **Chapter 2**) and assumptions about the kinds of housing most likely to be developed in each place type. These assumptions are based on recent housing production trends in zones similar to each proposed place type.

All action alternatives are expected to increase total housing supply more than No Action. The Preferred Alternative would increase total supply by 120,000 units. It would also result in the greatest amount of non-stacked housing (such as townhomes) compared to other alternatives. In Alternative 2 (Focused) and 5 (Combined), a greater share of new housing would be in stacked housing such as apartment buildings. ~~Alternative 3 (Broad) would produce the greatest diversity of housing types, particularly detached and attached homes.~~

Washington State law now requires that Seattle allow unit lot subdivision in Neighborhood Residential zones. This change would impact all action alternatives and is expected to result in more homes intended for sale on separate lots (as is common for townhomes) rather than as condominiums. While unit lot subdivision is not likely to change the size or shape of new buildings, it might make redevelopment more feasible since creating a condo association requires more work for developers and condominiums may be less desirable for some prospective buyers.

Exhibit 3.8-41. Projected Net New Housing Units by Housing Type

	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5	Preferred
Stacked Housing						
Condominiums	2,261	2,977	3,730	3,127	3,626	3,322
Apartments	73,109	93,815	76,652	88,662	110,079	91,106
Attached and Detached Housing						
>2,000 sq. ft.	1,389	698	1,111	1,111	1,111	4,132
>1,200 – 2,000 sq. ft.	648	533	4,260	1,578	1,128	14,766
≤1,200 sq. ft.	2,593	1,977	14,247	5,522	4,056	6,675
Total Net New Housing	**80,000**	**100,000**	**100,000**	**100,000**	**120,000**	**120,000**

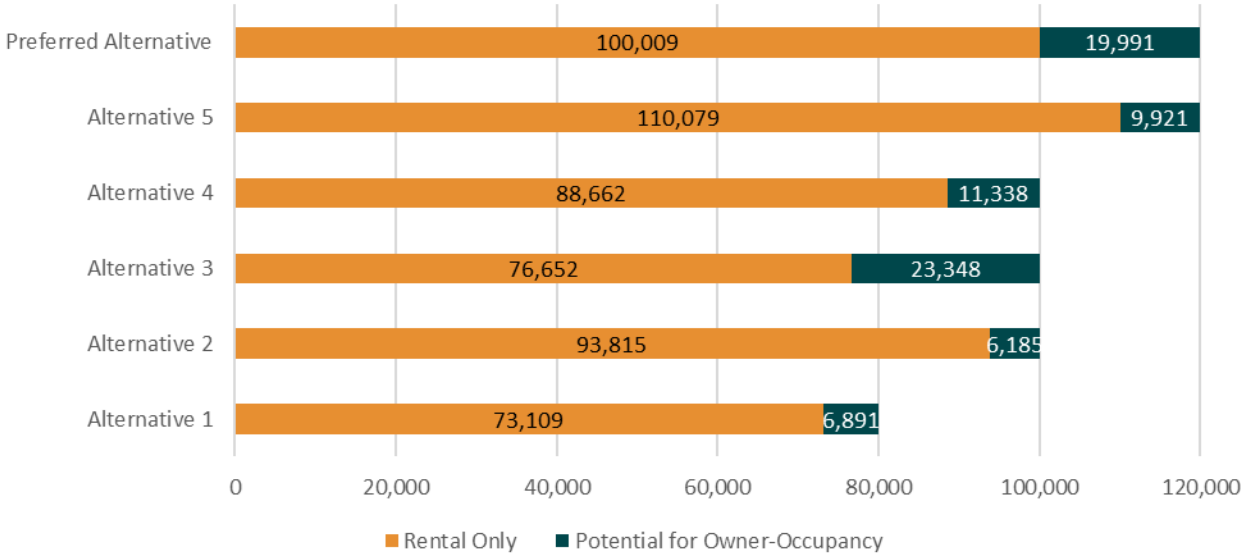
Note: Attached and detached housing refers primarily to unit types expected to be built in urban neighborhood areas. These include detached homes, attached, or detached accessory dwelling units, townhomes, or other low- to moderate-density formats that may be created through unit lot subdivision. All of these units could be sold separately or as condominiums to support homeownership opportunities. The Preferred Alternative was added to this exhibit since the Draft EIS—no edits were made to Alternatives 1–5.
Sources: City of Seattle, 2024; BERK, 2024.

All five alternatives are expected to add substantially more renter-occupied housing than owner-occupied housing to the city's housing supply. This is consistent with recent housing production trends where most housing growth is in new apartment buildings. However, the

alternatives vary substantially in the amount and potential tenure of projected new housing, as shown in **Exhibit 3.8-42**. These projections are based on the types of new housing expected to be produced in each alternative. They assume all attached and detached housing can be sold separately as either a condominium or on its own lot. For stacked housing, they assume that 60% would be built as condos in urban neighborhood areas, and 3% would be built as condos in all other place types.[57] However, any individual condominium or house on its own lot could be either owner- or renter-occupied.

Despite its higher overall housing growth estimate, Alternative 2 would produce fewer units that could be owner-occupied compared to Alternative 1 (No Action) due to its emphasis on zones that allow multifamily housing, which tend to be rental. The Preferred Alternative and Alternative 3 would produce the most units that could be owner-occupied due to ~~its~~ their emphasis on growth in small-scale detached and attached housing typically offered for sale. Over time, changes in consumer preference, housing costs, or laws governing condominium construction could result in changes in the percentage of units that are owner-occupied.

Exhibit 3.8-42. Projected Net New Housing Units by Tenure



Note: The Preferred Alternative was added to this exhibit since the Draft EIS—no edits were made to Alternatives 1–5.
Sources: City of Seattle, 2024~~3~~; BERK, 2024~~3~~.

Affordability of New Market Housing Supply

As discussed earlier, the balance of housing supply with the demand for housing in Seattle is a major contributing factor to market housing costs. Rising demand for new housing creates competition for a limited supply of homes. This causes upward pressure on rents and sales prices. In all alternatives, demand for housing in Seattle is likely to remain very high. However,

[57] Analysis by City of Seattle indicates that about 3% of all multifamily housing constructed in recent years were condominiums. However, trends indicate a much higher percentage of new attached and detached homes in Neighborhood Residential zones are being sold separately as condos. Therefore, in alternatives where stacked housing types are allowed in Neighborhood Residential zones, a higher percentage of those new units are expected to be available as condominiums.

the alternatives vary in the total amount of net new housing that would result. In general, the action alternatives would be expected to reduce competition for housing compared to No Action due to the increased housing growth that they accommodate. Alternative 5 and the Preferred Alternative would result in the largest increase in housing supply and therefore have the greatest impact on reducing overall market housing cost pressures for both new and older units.

New housing tends to be more expensive than older housing, as shown in **Exhibit 3.8-20** and **Exhibit 3.8-22**. However, this trend is due in part to the fact that new housing built in Neighborhood Residential zones has tended to be much larger than existing homes. As shown in **Exhibit 3.8-20**, **Exhibit 3.8-21**, and **Exhibit 3.8-23**, the affordability of new housing varies substantially by housing type and size. As of 2022, purchasing a median-priced detached home built between 2013 and 2022 requires nearly 300% of AMI, and even a median-priced detached home built before 1994 is affordable only to households with an income of at least 182% of AMI. By contrast, new apartments (built 2013-2022) were typically affordable to households with incomes of 80-100% of AMI. Among for-sale housing, new townhouses are typically affordable to households with incomes of 166% of AMI, smaller non-stacked condos less than 1,200 sq ft are affordable at 138% of AMI, and stacked condos are affordable at 117% of AMI. These affordability levels could change in the future, depending on the amount and type of housing created in Seattle, as well as other factors. Additionally, changes to density limits in Neighborhood Residential zones could result in smaller units that are comparatively lower cost.

Production of New Affordable Units through MHA & MFTE

Seattle has two programs that support the production of new income-restricted affordable housing through developer contributions or incentives alongside housing growth: Mandatory Housing Affordability (MHA) and the Multifamily Tax Exemption (MFTE). Under all alternatives, Seattle is expected to gain additional income-restricted units through these programs. However, the alternatives differ in the likely number of affordable units produced. This section briefly describes each program and then compares projected outcomes.

Mandatory Housing Affordability

MHA supports the development of new income-restricted affordable housing in Seattle. To provide affordable housing and mitigate the impacts of development, new commercial, residential, and live–work projects in designated zones must contribute to affordable housing by including affordable units within new development (performance option) or paying into a City fund that supports the creation and preservation of affordable housing (payment option). Specific requirements vary both geographically and by the scale of zoning change that implemented MHA, which in most cases is reflected as a suffix in the zone name.

Development in many areas of Seattle is already subject to MHA requirements. All action alternatives include proposals to rezone areas of the city, which would modify existing MHA requirements or trigger new MHA requirements in those areas. Additionally, the higher total housing growth estimates of the action alternatives mean more overall housing development would be subject to MHA requirements. **Exhibit 3.8-43** compares the projected number of net

new income-restricted units expected under each alternative from the application of MHA on residential development. These projections assume that the City will not extend MHA requirements in any Neighborhood Residential (NR) zone.[58] They show that Alternative~~s 2, 4, and~~ 5 would most substantially increase the number of new income-restricted units produced, compared to No Action~~.~~. The Preferred Alternative would have a smaller positive impact, somewhat lower than Alternatives 2 and 4. ~~while~~ Alternative 3 would have no~~a smaller~~ impact.

Exhibit 3.8-43. Projected New Income-restricted Affordable Units through MHA-Residential (Excluding NR Zones for all Alternatives)

	Alternative 1: No Action	Alternative 2: Focused	Alternative 3: Broad	Alternative 4: Corridor	Alternative 5: Combined	Preferred Alternative
Performance Units	1,131	1,614	1,131	1,400	1,787	1,524
Payment Units	9,891	13,544	9,891	13,142	15,505	12,338
Total	**11,022**	**15,158**	**11,022**	**14,542**	**17,293**	**13,862**

Note: These projections assume that the city will not apply MHA requirements in Neighborhood Residential zones. Assumption was 75% payment for stacked flats and 100% payment for attached and detached housing based roughly on recent development. The Preferred Alternative was added to this exhibit since the Draft EIS—no edits were made to Alternatives 1–5.
Source: City of Seattle, 2024~~3~~.

The City ~~is~~ was considering whether to extend MHA requirements to include development in some or all NR zones but is not considering MHA for NR zones in the Preferred Alternative.[59] **Exhibit 3.8-44** shows the ~~likely~~ potential impacts of this change on the production of income-restricted units in Alternatives 1–5 if we assume that MHA requirements in NR zones resemble the existing MHA requirements in other zones. It shows the potential for more income-restricted units produced ~~for~~ in the action alternatives, compared to a scenario where MHA requirements do not apply in ~~Urban~~ Neighborhood Residential zones.

Exhibit 3.8-44. Projected New Income-restricted Affordable Units through MHA-Residential (Including NR Zones where Updated in Alternatives 1-5, Preferred Alternative Does Not Apply MHA to NR Zones)

	Alternative 1: No Action	Alternative 2: Focused	Alternative 3: Broad	Alternative 4: Corridor	Alternative 5: Combined	Preferred Alternative
Performance Units	1,131	1,614	1,163	1,400	1,800	N/A
Payment Units	9,891	13,544	13,066	13,142	16,758	N/A
Total	**11,022**	**15,158**	**14,229**	**14,542**	**18,558**	**N/A**

Note: With the exception of the Preferred Alternative, t~~T~~hese projections assume that the City ~~will apply~~ applies MHA requirements in NR zones. The Preferred Alternative was added to this exhibit since the Draft EIS—no edits were made to Alternatives 1–5.
Source: City of Seattle, 2024~~3~~.

[58] NR zones currently are one of the only areas of Seattle where MHA requirements do not apply to residential development.
[59] Note: The Preferred Alternative does not include expanding MHA requirements to NR zones.

Multifamily Tax Exemption

MFTE is a developer incentive that provides a tax exemption on eligible multifamily housing in exchange for setting aside a portion of units as income- and rent-restricted affordable housing. This exemption lasts 12 years, at which point the property owner can renew the tax exemption and affordability requirements or rent those units at market rates. Therefore, new affordable units are added to Seattle's housing supply each year as developers opt-in to the program, while other affordable units come offline when property tax exemptions expire. **Exhibit 3.8-45** shows projections of net new affordable housing units produced through MFTE under each alternative. These projections are based on current trends in use of the program, and the expected new housing production by zone under each alternative. Alternatives 1 and 3 are not expected to increase net MFTE units overall as the number of new affordable units produced with MFTE would equal the number expiring and returning to market rates. Alternatives 2, 4, and 5 and the Preferred Alternative expect modest growth in the total supply of MFTE units.

Exhibit 3.8-45. Projected Net Gain of Affordable Housing Units through MFTE

	Alternative 1: No Action	Alternative 2: Focused	Alternative 3: Broad	Alternative 4: Corridor	Alternative 5: Combined	Preferred Alternative
Total	**0**	~~600~~**725**	**0**	~~450~~**636**	~~525~~**1,129**	**865**

Note: The Preferred Alternative was added to this exhibit since the Draft EIS. Based on calculation errors, edits to correct errors for Alternatives 2, 4, and 5 are shown in tracks.
Source: City of Seattle, 2024~~3~~.

Loss of Housing Stock through Demolition

Between 2009 and 2022, more than 600 housing units were lost due to demolition each year in Seattle. Demolition of older housing is expected to continue under all alternatives as lots with older homes are redeveloped with newer and higher-density housing. However, the number of units demolished is expected to vary widely by alternative, from 5,030 units in Alternative 1 to ~~9,148~~11,086 units in the Preferred Alternative ~~3~~, as shown in **Exhibit 3.8-46**. This table also shows the ratio of net new units per demolished unit. Here Alternatives 1 and 2 have the highest ratio, while the Preferred Alternative and Alternative 3 have~~s~~ the lowest. The reason for this variation is discussed in detail below.

Exhibit 3.8-46. Projected Housing Units Demolished by EIS Analysis Area and Alternative

Area	Alternative 1: No Action	Alternative 2: Focused	Alternative 3: Broad	Alternative 4: Corridor	Alternative 5: Combined	Preferred Alternative
Area 1	871	1,192	1,662	1,330	1,758	2,970
Area 2	1,103	1,391	2,636	2,202	2,274	2,657
Area 3	389	534	484	473	565	923
Area 4	810	810	810	810	810	797

Area	Alternative 1: No Action	Alternative 2: Focused	Alternative 3: Broad	Alternative 4: Corridor	Alternative 5: Combined	Preferred Alternative
Area 5	685	929	735	745	915	1,213
Area 6	565	767	1,404	1,070	1,374	1,492
Area 7	80	85	48	87	140	144
Area 8	527	637	1,369	918	1,284	890
Total units demolished	5,030	6,345	9,148	7,635	9,120	11,086
Total net new units	80,000	100,000	100,000	100,000	120,000	120,000
Ratio of net new units to units demolished	**15.9**	**15.8**	**10.9**	**13.1**	**13.2**	**10.8**

Note: The Preferred Alternative was added to this exhibit since the Draft EIS—no edits were made to Alternatives 1–5.
Source: City of Seattle, 2024~~3~~. BERK, 2024~~3~~.

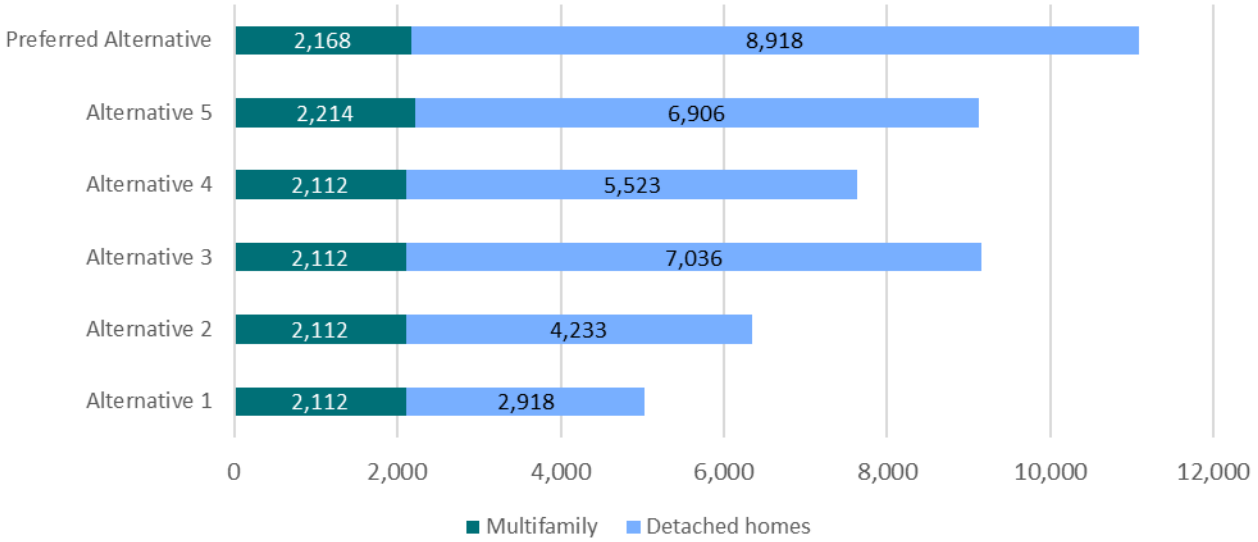
Two factors play the largest role in determining projected demolitions. The first is the total amount of housing growth. Alternatives with more projected growth typically have higher rates of demolition, given that more lots would redevelop to accommodate the additional growth. This explains why Alternative 1, which would have the least housing production, is projected to have the fewest total demolished units~~tions~~.

The second factor is the amount of housing growth by place type. Alternatives 1 and 2 focus more growth in regional centers, urban centers, and, for Alternative 2, neighborhood centers and therefore are expected to see much of the net new housing produced as higher-density apartment and condominium buildings. Many of these buildings would be constructed on lots that were formerly in commercial use and therefore do not include housing units. Additionally, this ~~N~~new housing ~~built at~~would be relatively higher densities and therefore ~~require fewer parcels to redevelop to accommodate a given amount of growth, and~~ more net new units are produced for every home demolished. On the other hand, the Preferred Alternative, as well as Alternatives 3~~, 4~~, and 5 all anticipate more low- and moderate-density housing produced outside centers. The parcels redeveloped for this housing are more likely to include older detached homes. Additionally, ~~G~~given its lower density, new development in these areas would produce fewer net new units for every older unit demolished. For example, an existing detached home demolished and replaced with a new detached home and two ADUs produces two net new units for every one demolished unit. But if that same home is replaced instead with a six-plex, five net new units occur for one demolished unit.

The type of housing demolished would also vary. **Exhibit 3.8-47** shows the projected number of detached homes and multifamily housing units that would be demolished by alternative. Almost no variation exists in the number of multifamily units demolished across alternatives, with the exception that the Preferred Alternative and Alternative 5 are~~is~~ expected to result in slightly more demolitions. This is because the alternatives vary primarily in the amount of growth expected in new place types located where detached homes currently predominate. As a

consequence, most demolitions are expected to be older detached homes, and the total number of detached homes expected to be demolished varies substantially across alternatives.[60]

Exhibit 3.8-47. Projected Housing Units Demolished by Housing Type and Alternative

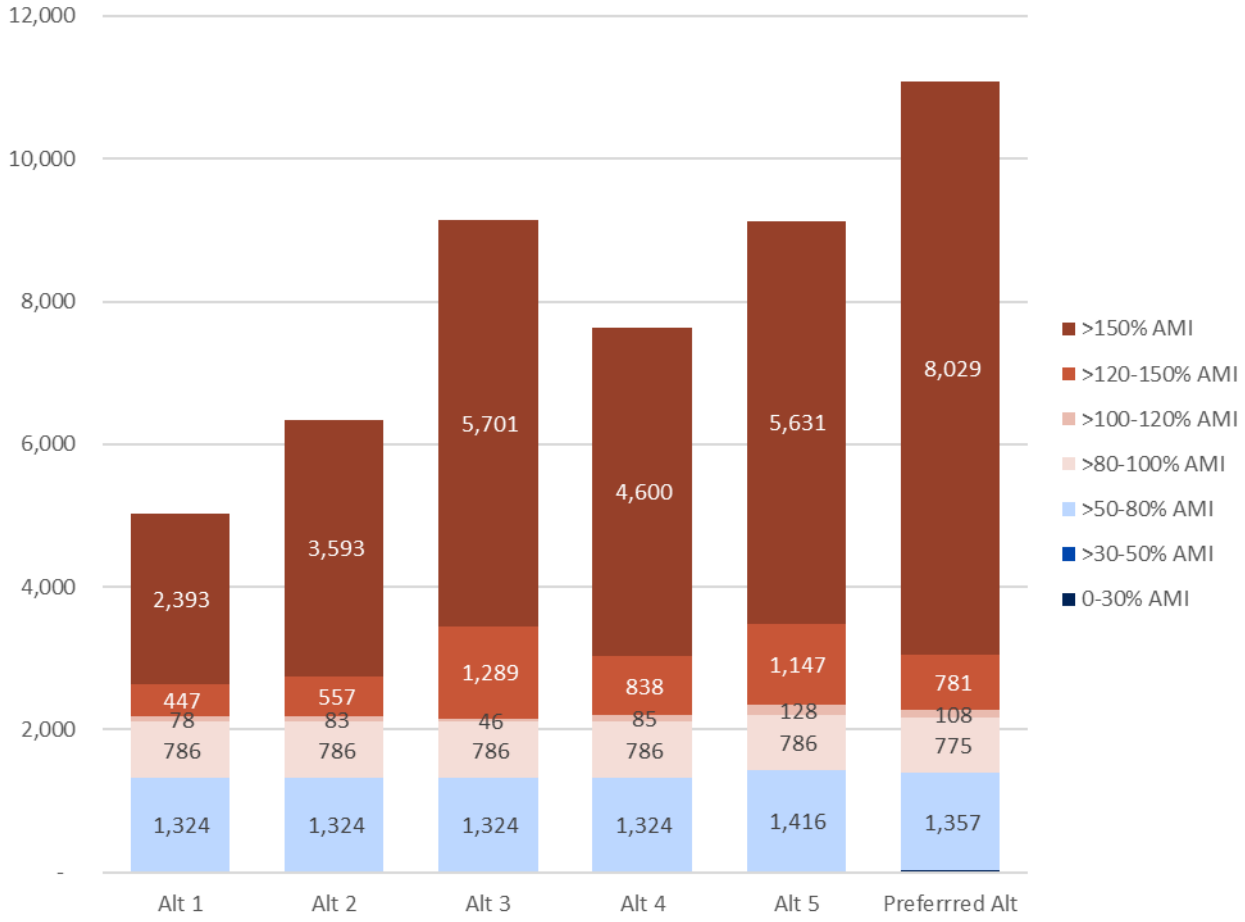


Note: The Preferred Alternative was added to this exhibit since the Draft EIS—no edits were made to Alternatives 1–5.
Sources: City of Seattle, 2024~~3~~; BERK, 2024~~3~~.

Exhibit 3.8-48 presents projections of housing lost due to demolition by affordability level. For detached homes, these projections are based on analysis of median sales price for older detached homes by analysis area (see **Exhibit 3.8-22**). For units in multifamily buildings, these projections are based on the affordability of apartment rents in older structures (see **Exhibit 3.8-20**). This analysis shows that all alternatives are expected to result in the demolition of a similar number of units affordable at 120% AMI or below. The alternatives vary primarily in the number of detached homes demolished, which tend to be affordable only to households with incomes above 120 or 150% AMI, as shown in **Exhibit 3.8-48**.

[60] To develop these projections, the City of Seattle used King County Assessor data to identify parcels most likely to redevelop in the future based on characteristics such as the year built, density of development relative to what is allowed under current zoning, and the ratio of improvement value to land value. Next, the City classified the type of housing currently on redevelopable parcels as single family (detached) or multifamily. Then, for each place type it calculated the percentage of units on redevelopable parcels that are single family or multifamily. Finally, these percentages were applied to the estimate of total demolished housing units by place type to calculate single family and multifamily units demolished. For all growth outside the place types defined in Alternative 1, this analysis assumes all demolished units are detached homes.

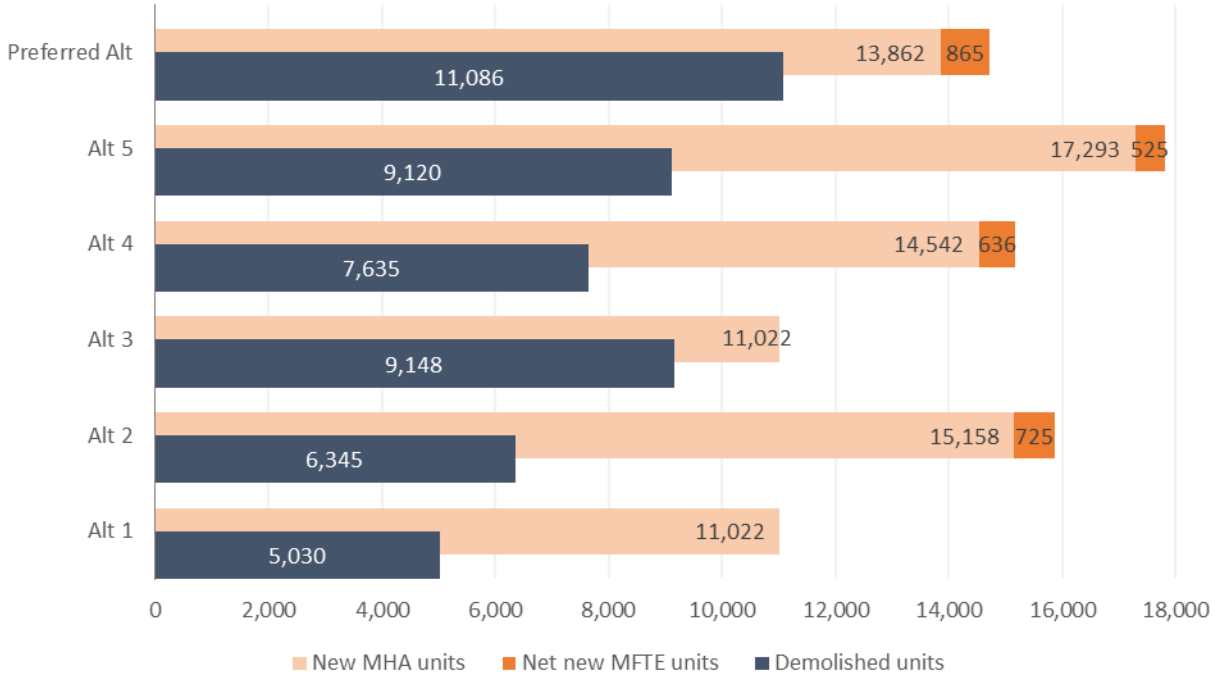
Exhibit 3.8-48. Projected Housing Units Lost to Demolition by Affordability Level



Note: The Preferred Alternative was added to this exhibit since the Draft EIS—no edits were made to Alternatives 1–5. No units from affordable at 30-50% AMI are projected to be demolished in any alternative. A very small number of 0-30% AMI units (2-40~~12~~) could be demolished. These counts are not shown in the chart.
Sources: City of Seattle, 2024~~3~~; BERK, 2024~~3~~.

Exhibit 3.8-49 compares the projected number of demolished units to the projected number of new income-restricted affordable units produced through MHA and MFTE combined. In Alternatives 1, 2, 4, and 5 the number of new affordable units substantially exceeds the number of units demolished. In Alternative 3, new affordable units only slightly exceed demolitions, in part because of the assumption that MHA would not apply in NR zones. Alternatives 2 and 5 are expected to create the most new affordable units per unit demolished.

Exhibit 3.8-49. Comparison of Demolished Units to New Affordable Housing from MHA and MFTE



Note: The Preferred Alternative was added to this exhibit and net new MFTE units revised for Alternatives 2 and 4 (see **Exhibit 3.8-45**) since the Draft EIS—no other edits were made to Alternatives 1–5. This chart does not show total new housing supply. Alternative 5 and the Preferred Alternative would provide 120,000 net new units, Alternatives 2-4 would provide 100,000 net new units, and Alternative 1 would provide 80,000 net new units. Additionally, these projections assume that the City will not apply MHA requirements in any NR zone. Applying MHA would result in additional production of new income-restricted affordable housing.
Sources: City of Seattle, 2024~~3~~; BERK, 2024~~3~~.

Displacement

This section evaluates the potential for displacement of Seattle households under each alternative. The first part estimates physical displacement associated with demolished housing units. This is followed by a discussion of how economic and cultural displacement pressures may vary by alternative.

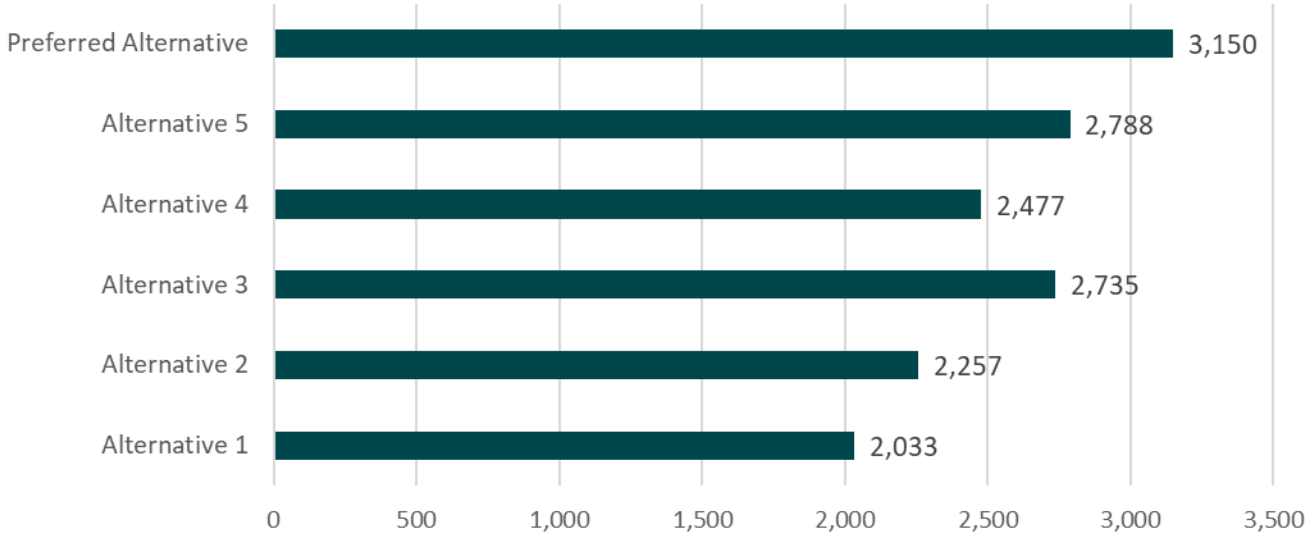
Physical Displacement

Not all demolitions result in the physical displacement of a household. For example, a homeowner may choose to sell their home to a developer or demolish it themselves in order to build a larger home. Renter households, however, are more likely to be physically displaced if the owner of their building decides to demolish the building they occupy. In some circumstances a renter household whose unit is demolished may not be considered physically displaced (e.g., they voluntarily ended their lease and the building owner subsequently decided to demolish the building). Similarly, in some circumstances a renter household might be physically displaced from their unit but relocate within the same neighborhood. This renter would be physically displaced from their unit but not from their neighborhood. Conversely, a

renter household might be physically displaced under circumstances apart from demolition, like eviction or the expiration of rent restrictions. Overall, estimating the number of renter households residing in units projected to be demolished is one way to conservatively estimate how many households could be physically displaced in each alternative.

Using Census data about the household characteristics of detached and multifamily housing occupants in each analysis area, projections of demolished units by housing type (**Exhibit 3.8-47**), and vacancy rates by housing type, it is possible to roughly estimate how many renter households could be physically displaced in each alternative. The results of this analysis are shown in **Exhibit 3.8-50**. The number of renter households varies less than the total number of units demolished (see **Exhibit 3.8-47**) because the occupants of detached homes are more likely to be homeowners, and much of the variation in demolition by alternative was due to the number of detached homes demolished. Nonetheless, ~~Alternative 5~~the Preferred Alternative would be expected to result in the greatest potential for renter households displaced due to demolitions, while Alternative 1 would be expected to see the fewest.

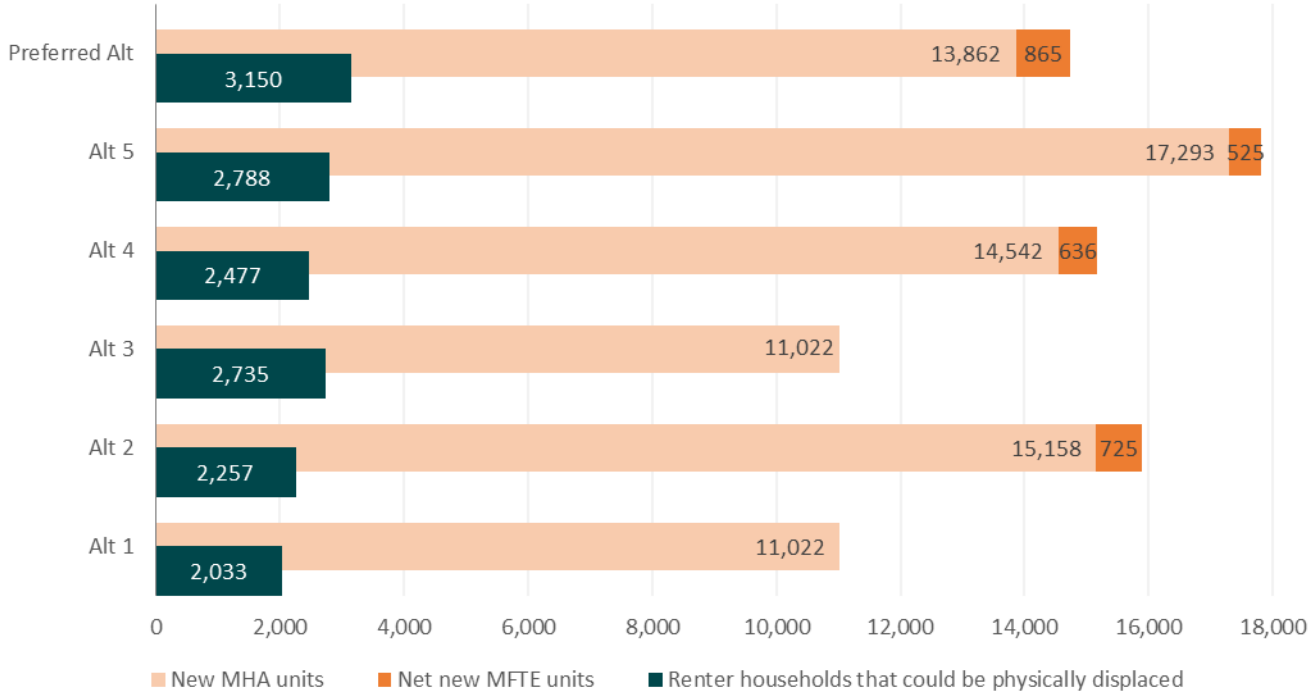
Exhibit 3.8-50. Renter Households Physically Displaced by Alternative



Note: The Preferred Alternative was added to this exhibit since the Draft EIS—no edits were made to Alternatives 1–5.
Sources: City of Seattle, 2024~~3~~; BERK, 2024~~3~~.

Exhibit 3.8-51 compares the projected number of renter households that could be physically displaced through demolition to the number of new income-restricted affordable units expected to be generated by MHA or MFTE. Across all alternatives, this conservative estimate of physically displaced renter households is much lower than the amount of new affordable housing that would be built during the planning period.

Exhibit 3.8-51. Renter Households Physically Displaced Compared to New Income-Restricted Affordable Units from MHA or MFTE

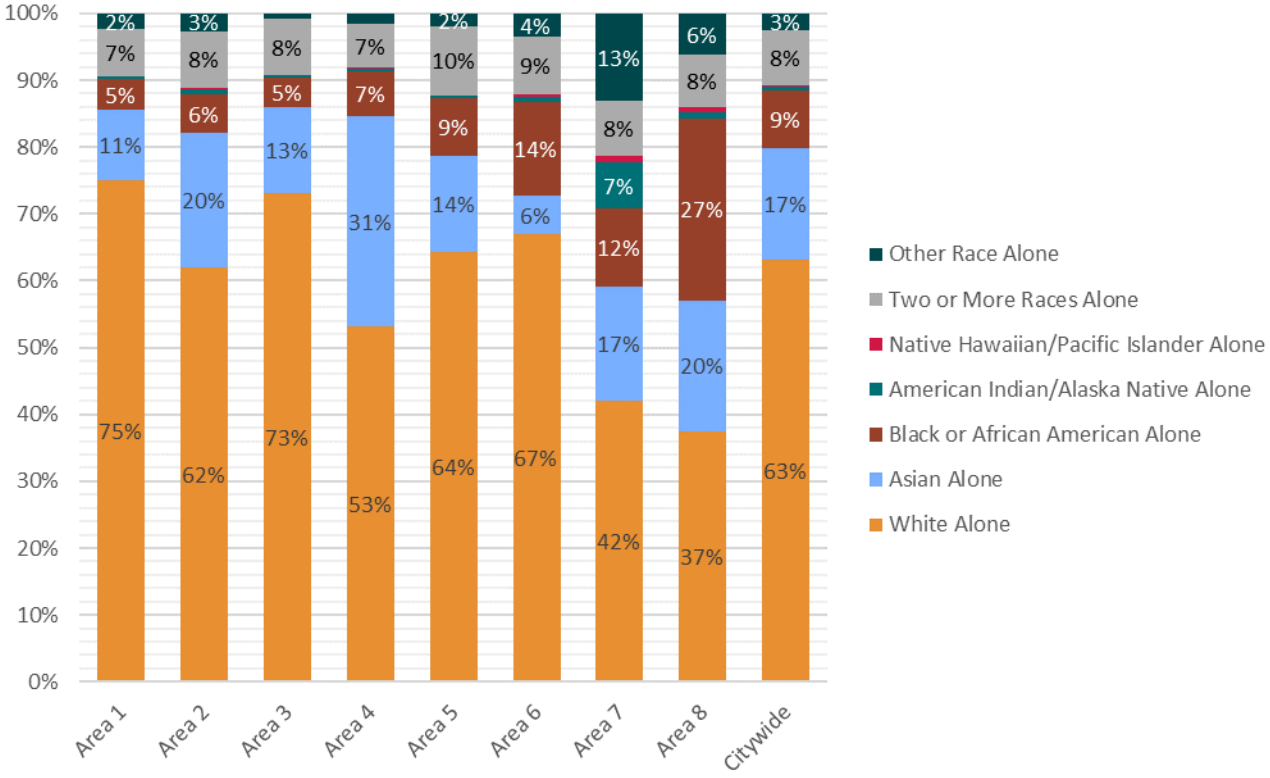


Note: The Preferred Alternative was added to this exhibit and net new MFTE units revised for Alternatives 2 and 4 (see **Exhibit 3.8-45**) since the Draft EIS—no other changes were made to Alternatives 1–5. These projections assume that the City will not apply MHA requirements in any Neighborhood Residential zone. Applying MHA would result in additional new income-restricted affordable housing production.
Sources: City of Seattle, 2023~~3~~4; BERK, 2024~~3~~4.

While it is impossible to predict exactly which kinds of renter households are most likely to be displaced in each alternative, information about the characteristics of today's renter households is available. **Exhibit 3.8-52** shows the breakdown of renter households by the race of householder[61] and analysis area. **Exhibit 3.8-53** breaks down renter households by ethnicity. Citywide, about 40% of all renter households are BIPOC, and these households are more likely to be vulnerable to displacement than White, Non-Hispanic households.[62] Areas with a higher proportion of BIPOC householders may see these households displaced at a disproportionately high rate compared to households with White householders.

[61] The Census term householder refers to "the person (or one of the people) in whose name the housing unit is owned or rented (maintained) or, if there is no such person, any adult member, excluding roomers, boarders, or paid employees." Source: https://www.census.gov/programs-surveys/cps/technical-documentation/subject-definitions.html#householder
[62] Source: American Community Survey 5-Year Estimates (2017-2021): S2502—Demographic Characteristics for Occupied Housing Units.

Exhibit 3.8-52. Race of Householder for Renter Households, by EIS Analysis Area



Note: Percentage values less than 2% are not displayed for readability.
Source: American Community Survey 5-Year Estimates (2017-2021): S2502—Demographic Characteristics for Occupied Housing Units; City of Seattle, 2023.

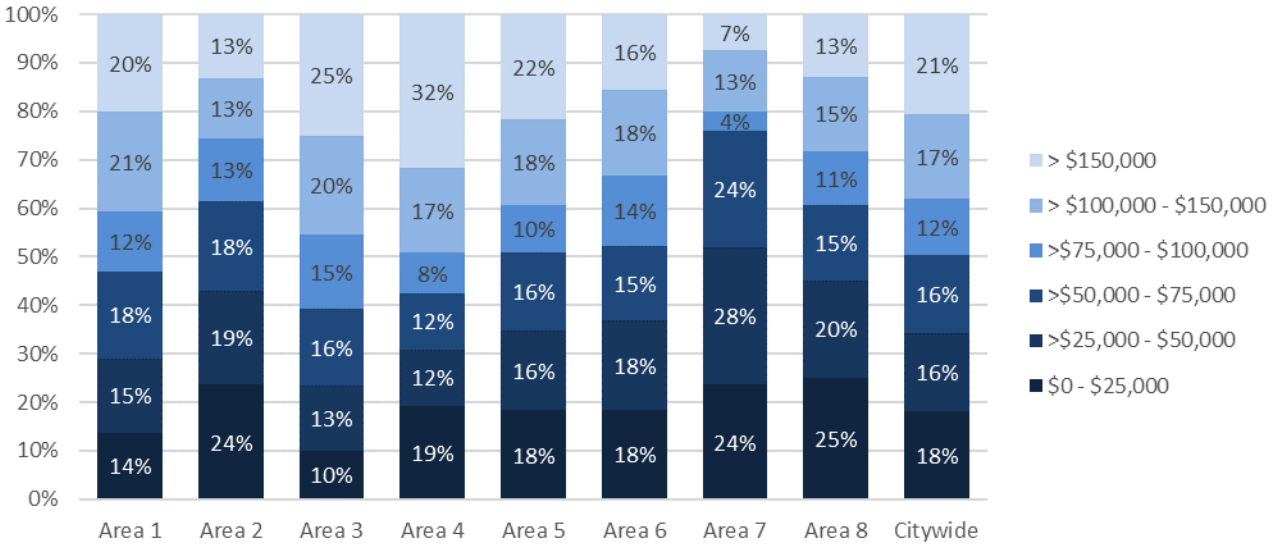
Exhibit 3.8-53. Ethnicity of Householder for Renter Households by EIS Analysis Area

	Area 1	Area 2	Area 3	Area 4	Area 5	Area 6	Area 7	Area 8	Citywide
Hispanic or Latino	7.3%	7.9%	7.6%	6.8%	7.4%	8.5%	27.7%	10.4%	7.9%
Not Hispanic of Latino	92.7%	92.1%	92.4%	93.2%	92.6%	91.5%	72.3%	89.6%	92.1%

Source: American Community Survey 5-Year Estimates (2017-2021): S2502—Demographic Characteristics for Occupied Housing Units; City of Seattle, 2023.

The impact of physical displacement on a renter household would vary based on household income. Compared to higher-income households, lower-income households who are displaced would be ~~much~~ less likely to find adequate housing they can afford within the same neighborhood. **Exhibit 3.8-54** shows household income for renter households across all EIS Analysis Areas and citywide. Just over a third of renter households citywide have incomes at or below $50,000. Some of these households live in income-restricted housing units unlikely to be demolished. Others live in older market-rate housing that may be at risk of demolition.

Exhibit 3.8-54. Household Income for Renter Households by EIS Analysis Area



Source: American Community Survey 5-Year Estimates (2017-2021): B25118—Tenure by Household Income in the past 12 months (in 2021 inflation-adjusted dollars); City of Seattle, 2023.

As discussed in the Affected Environment section above, records from Seattle's TRAO program indicate that about 89 households with incomes 50% of AMI or less are displaced each year due to demolition. This is about 13.5 for every 10,000 renter households at this income level (or 0.1%). While this percentage doesn't account for all physical displacement,[63] it does provide a sense of scale of impact to compare to other trends like economic displacement.

Economic Displacement

Under all alternatives, economic displacement is expected to continue having a much greater impact on Seattle residents than physical displacement, consistent with recent historic trends. This is because demand for housing in Seattle is expected to remain strong, and high demand for housing leads to competition that pushes up market-rate housing prices. However, alternatives that provide more additional housing supply are expected to reduce competition for exiting units and therefore reduce the upward pressure on market-rate housing costs, compared to Alternative 1 (No Action). Alternative 5 (Combined) and the Preferred Alternative are ~~is~~ expected to have the greatest impact on reducing economic displacement pressure because it anticipates the largest increase in housing supply.

The kinds of households economically displaced would also vary by alternative, given that housing produced under each alternative is expected to vary by location, type, and tenure (ownership or rental). For example, Alternative 3 (Broad) is expected to produce considerably more new ownership units than other alternatives. This may provide more options for moderate-income households seeking homeownership and who may otherwise move outside

[63] See discussion under Physical Displacement in **Section 3.8.1 Affected Environment** above.

Seattle to find affordable options. Alternatives 2 (Focused), 4 (Corridors), and 5 (Combined) all provide much more rental housing than No Action and therefore could be expected to see less economic displacement among renter households. As noted earlier, Alternative 5 and the Preferred Alternative would result in the largest increase in overall housing supply and therefore have the greatest potential to reduce market pressures at the root of economic displacement.

Cultural Displacement

Cultural displacement will remain a challenge in Seattle under all alternatives. However, impacts on cultural displacement under each alternative could vary in two main ways. First, alternatives that reduce economic displacement pressures may also reduce cultural displacement pressures. This is because economic displacement often precipitates cultural displacement due to the impacts to social networks that result when members of a cultural community cannot weather rising housing costs. For communities of color, immigrants, and refugees, social cohesion often plays a bigger role in location decisions than for other populations. When community members are pushed out due to economic pressures, other residents, businesses, and institutions may also choose to relocate as well.

The alternatives may also vary in the likelihood of demolition or displacement of cultural assets such as businesses or institutions that serve specific racial or ethnic communities. Since cultural anchors, gathering spaces, arts organizations, small businesses, and religious institutions are not ubiquitous throughout the region, the presence of these cultural assets in certain neighborhoods or areas can have particular importance for racial or ethnic minority households in their location decisions. The zoning changes and patterns of growth proposed under some alternative could affect the likelihood that cultural assets are demolished in favor or redevelopment or replaced by new businesses that cater to the tastes of new residents who do not share the same cultural background. For example, Alternatives 2, 4, ~~and~~ 5, and the Preferred Alternative focus more growth in neighborhood centers or corridors that may currently include older commercial buildings where cultural community-serving businesses and institutions are located.

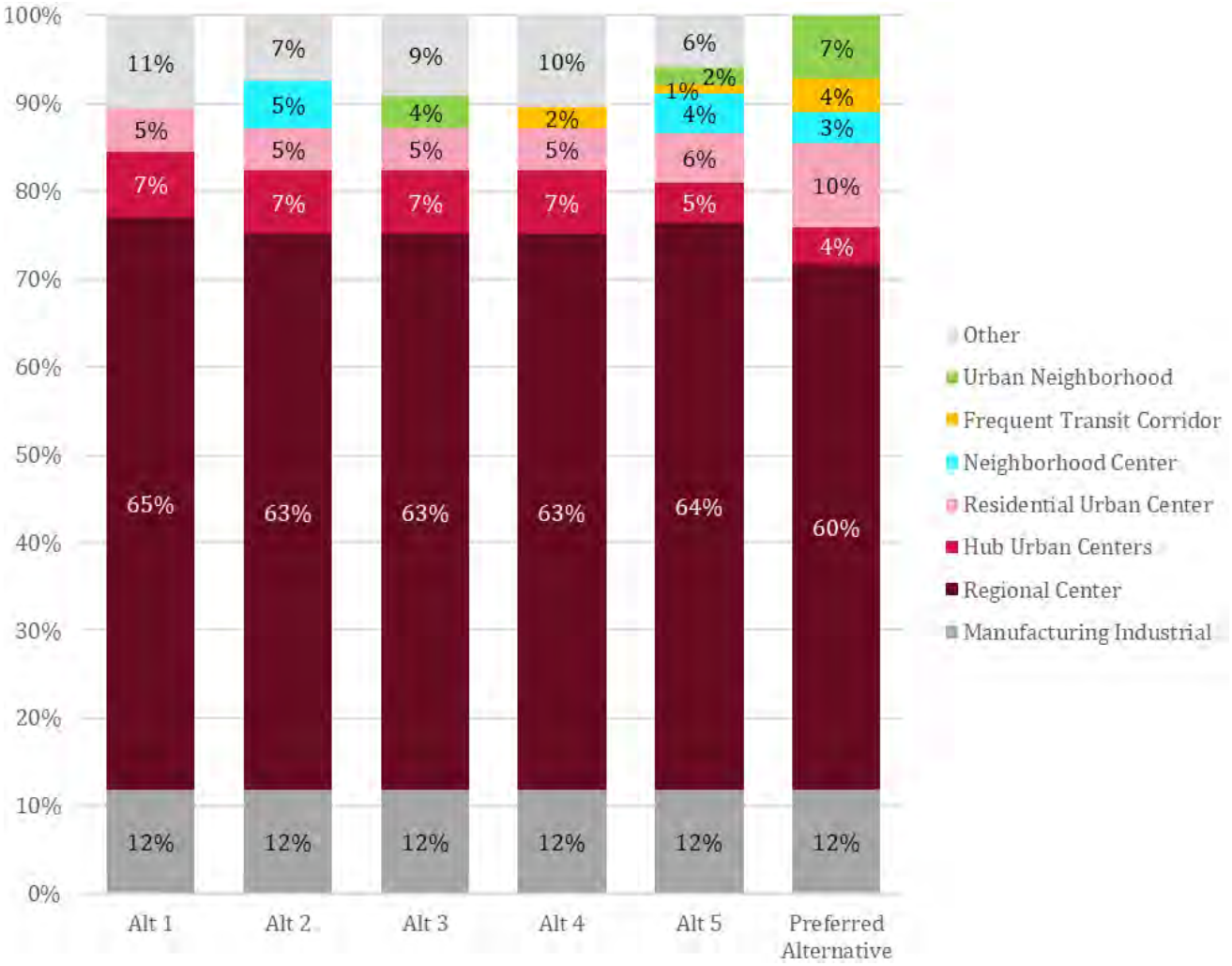
Businesses and institutions serving different communities are also subject to economic displacement pressure regardless of whether their building is demolished. Given the complexity in how people define and access their cultural community, it is difficult to predict the relative impacts of different alternatives on cultural displacement.

Employment

Seattle's total employment is expected to increase by 158,000 jobs in all alternatives. However, the alternatives differ in the pattern of new growth across the city. **Exhibit 3.8-55** compares the share of citywide employment growth expected by place type in each alternative. In all alternatives, most employment growth is expected to occur in ~~urban~~ regional centers such as Downtown, South Lake Union, University District, and Northgate. All alternatives assume 12%

of growth will be in manufacturing industrial areas. The greatest variation across alternatives is in the distribution of growth in the remaining place types. For instance, job growth in neighborhood centers, ~~and~~ frequent transit corridors, and urban neighborhood has the potential to provide more neighborhood-serving businesses and services in areas of the city that currently have few options. The Preferred Alternative ~~2~~ would focus about 14~~5~~% of job growth in these place types ~~new neighborhood centers~~, higher than all other alternatives. It also focuses the most growth in residential urban centers. The result is a pattern of job growth that is more dispersed across the city than expected under No Action and the other action alternatives.~~Alternative 5 would distribute about 5% of jobs across neighborhood centers and corridors combined. Alternatives 1, 3, and 4 offer relatively less job growth in these areas.~~

Exhibit 3.8-55. Employment Growth by Place Type



Note: The Preferred Alternative was added to this exhibit since the Draft EIS and place type names revised to reflect the action alternatives—no changes were made to Alternatives 1–5. "Other" refers to areas outside designated place types. See **Exhibit 2.1-1** in **Chapter 2** for a cross-walk of existing place types (existing and Alternative 1) versus proposed place type names under the other alternatives.
Source: City of Seattle, 2023.

Equity & Climate Vulnerability Considerations

See also **Section 3.6 Land Use Patterns & Urban Form** and **Section 3.10 Transportation**.

Seattle's housing affordability crisis disproportionately impacts communities of color and lower-income residents.

Beyond producing cost burden, economic displacement, and housing insecurity, Seattle's rising housing costs limit the amount of money available for other expenses and can curtail a person's ability to access resources necessary for economic success such as education or equity to start a business. High housing costs can also force people to live further from jobs, schools, or social support such as friends and family. This can impact social connection and the community resiliency these connections support. It also has health implications due to increased car dependency and reduced opportunity for active transportation.

Households moving away from Seattle due to displacement or the search for housing they can afford also has climate implications. When households are more dependent on driving and forced to travel further to reach jobs, schools, and local services, they produce more greenhouse gas emissions. Increased demand for housing options on the periphery of the Seattle region also creates pressure to convert more natural areas for residential development.

Alternatives that increase housing supply compared to No Action have greater potential to limit escalating housing costs that cause displacement and provide more opportunities for households to live closer to jobs, schools, social supports, and other amenities in Seattle. However, the types of housing produced also have potential implications for equity. A dearth of moderately priced ownership housing options prevents pathways to homeownership and wealth generation for both low- and moderate-income households. Achieving homeownership often requires moving outside Seattle to find more affordable ownership housing options. However, as discussed already, relocating outside Seattle can have negative impacts not only for the households that moved but also for the climate.

Impacts of Alternative 1: No Action

If the City takes no action, current trends are expected to continue. Housing costs would most likely continue to rise faster than AMI. This would result in the highest economic displacement pressure of all alternatives. This pressure would have disproportionate impact on communities of color, particularly Black and Indigenous residents who are most likely to be vulnerable given their lower median household income (see **Exhibit 3.8-9**). While this alternative is expected to result in the fewest demolished housing units and lowest potential for physical displacement of renter households, it would also yield the lowest production of new affordable housing through MHA and MFTE and the smallest increase in overall housing supply.

Employment growth would continue to be focused in urban centers and urban villages, with more limited change in other areas. As a result, areas with limited neighborhood-serving retail

and commercial development would see little change, and their residents would continue to have very limited options for local services within walking or biking distance.

130th/145th Station Area

Both housing and employment growth would be much lower in the station area compared to the other alternatives. This would limit the number of households and businesses that can benefit from nearby access to the light rail stations. It would also limit the variety of housing choices available.

Equity & Climate Vulnerability Considerations

Housing Affordability

Housing affordability challenges under Alternative 1 would be similar to the existing trends described under Citywide Affected Environment and Impacts Common to All Alternatives. Although there would continue to be new housing built over the next 20 years, the rate of new housing production would likely continue to fall far short of demand, contributing to rising housing costs and disproportionately inequitable outcomes for low-income and BIPOC community members.

Impacts of Alternative 2: Focused

In this alternative, Seattle would grow by 20,000 additional housing units compared to Alternative 1 (No Action). This additional growth would occur in new neighborhood centers, which would increase the number and variety of housing options in existing Neighborhood Residential zones. About 94% of the new housing is expected to be exclusive available for rent and only 6% could support homeownership. This alternative provides the fewest new ownership housing options among all the alternatives, including No Action.

Much of this new growth would be focused in neighborhoods that the City determined have relatively lower risk of displacement (see **Exhibit 3.8-31** above), including parts of EIS Analysis Areas 1, 2, 3, 5, and 6. This could limit the negative impacts of physical displacement while allowing more households to live in areas of higher opportunity. Compared to the other action alternatives, Alternative 2 would result in the fewest units demolished and fewest physically displaced renter households. Alternative 2 would produce more new income-restricted units through MHA and MFTE than any alternative other than Alternative 5.

Alternative 2 will also allow for shops and services in new neighborhood centers. This would result in more Seattle residents living within a short walk or bike ride of these local amenities.

130th/145th Station Area

Alternative 2 would support transit-oriented development in these station areas at higher levels of density than allowed under current zoning. It is expected to more than double the number of new housing units compared to No Action and increase overall housing supply more than any alternative other than Alternative 5. This would allow many more households to live near light rail transit.

Equity & Climate Vulnerability Considerations

Housing Affordability

Except for Alternative 5, Alternative 2 would provide the greatest benefit for low-income renter households. This is due to the emphasis on increased rental housing production and its potential impact on moderating rental housing cost escalation as well as increased affordable housing production through MHA. However, Alternative 2 would provide the least benefit for moderate-income households seeking to access the homeownership market and associated wealth generation opportunities. In some cases, households will choose to move out of Seattle to find ownership housing they can afford. This kind of economic displacement has financial, social, health, and climate implications, as discussed under Impacts Common to All Alternatives.

Impacts of Alternative 3: Broad

Like Alternative 2, in Alternative 3 Seattle would grow by 20,000 more housing units than Alternative 1 (No Action). This additional growth would unfold across all Neighborhood Residential zones. Much of this new housing would be duplexes, triplexes, fourplexes, and stacked flats. Nearly a quarter of all new units produced could be available for homeownership, a much higher share than all other alternatives. This would result in a greater diversity of housing options in areas of Seattle where detached homes currently predominate.

With the exception of the Preferred Alternative, which includes more growth overall, Alternative 3 is expected to result in the most demolitions among all alternatives and the greatest potential for physical displacement of renter households. However, many demolished units would be older detached homes that tend to be relatively less affordable than other housing types. Alternative 3 also produces the fewest new income-restricted units through MHA and MFTE among all action alternatives.[64]

Alternative 3 would increase options for corner shops and flexibility for at-home businesses in Neighborhood Residential zones. This would result in some additional businesses and services in areas where they are currently scarce.

[64] This projection assumes that MHA does not apply in Neighborhood Residential zones. If the City applied MHA in Neighborhood Residential zones, the number of units would be substantially higher (13,043 rather than 9,489 net new affordable units) but still less than expected in all other action alternatives.

130th/145th Station Areas

The station area plan would not be implemented under Alternative 3; the area would grow based on the applicable citywide place types.

Equity & Climate Vulnerability Considerations

Housing Affordability

Except for No Action, Alternative 3 would provide the least benefit for low-income renter households. That is because rental housing supply and new affordable housing through MHA would only see modest increases compared to No Action. However, Alternative 3 would provide the greatest benefit for moderate income-households seeking to access the homeownership market and associated wealth generation opportunities. This is due to the emphasis on increased supply and diversity of housing types offered for sale. This could result in less economic displacement pressure for moderate-income households that wish to remain in the city.

Impacts of Alternative 4: Corridor

Like Alternatives 2 and 3, in Alternative 4 Seattle would grow by 20,000 more housing units than Alternative 1 (No Action). This additional growth would be focused in corridors where transit and amenities are located. About 89% of overall new housing production would be exclusively rental, with the large majority in apartment buildings in regional centers, urban centers, and corridors. However, compared to No Action, this alternative would also increase the supply of ownership housing types.

Alternative 4 is expected to result in more housing units demolished than No Action or Alternative 2 (Focused). However, many demolished units would be older detached homes that are relatively higher cost than other housing types. Alternative 4 would also produce much more new income-restricted affordable housing units than units demolished.

Compared to No Action ~~and other alternatives~~, Alternative 4 would focus more employment growth in corridors near residential areas, with the potential to increase neighborhood-serving businesses and services where they don't exist today.

130th/145th Station Areas

The station area plan would not be implemented under Alternative 4; the area would grow based on the applicable citywide place types.

Equity & Climate Vulnerability Considerations

Housing Affordability

Compared to No Action, Alternative 4 would provide benefits for both low-income renter households as well as moderate-income households that seek to access the homeownership market and associated wealth generation opportunities. This is due to an expected increase in rental housing supply, affordable housing production through MHA, and supply of for-sale housing types.

Impacts of Alternative 5: Combined

In this alternative, Seattle would grow by 40,000 additional housing units compared to Alternative 1 (No Action). Alternative 5 and the Preferred Alternative ~~This is~~have the largest increase in housing supply ~~among any alternative and would result in the greatest expansion of housing diversity of any alternative~~. Like all alternatives, most new housing is expected to be rental, but Alternative 5 would also produce more new ownership housing than ~~all alternatives except~~ Alternatives ~~3~~ 1 and ~~4~~2. Like Alternative 4, much of this new ownership housing would be in small-scale developments in Neighborhood Residential zones.

Alternative 5 is expected to result in more demolished housing units than all other alternatives except Alternative 3 and the Preferred Alternative. However, those demolished units would tend be older detached homes that are relatively higher cost than other housing types. Alternative 5 would produce the most new income-restricted affordable housing units through MHA and MFTE. This alternative, along with the Preferred Alternative, is also expected to have the biggest impact on reducing economic displacement by providing the largest increase in the supply of housing.

Compared to No Action, Alternative 5 would distribute employment growth across more areas of the city, including in new neighborhood centers and corridors where neighborhood-serving businesses and services are currently scarce.

130th/145th Station Area

This alternative would create a new urban center around the NE 130th St station area. This change would support transit-oriented development and the most housing and job growth compared to the other alternatives.

Equity & Climate Vulnerability Considerations

Housing Affordability

Alternative 5 would provide the greatest benefit for low-income renter households among all alternatives due to its impact on increasing rental housing supply and new affordable housing

through MHA and MFTE. Compared to No Action, it would also provide benefits for moderate income-households seeking to access the homeownership market and associated wealth generation opportunities. This is due to the increased supply and diversity of housing types that can be sold to homeowners. However, ~~both~~ the Preferred Alternative as well as Alternatives 3 and 4 are expected to produce more ownership housing.

Impacts of Preferred Alternative

Note: The impacts analysis for the Preferred Alternative was added since the Draft EIS.

Under the Preferred Alternative, Seattle would grow by 40,000 additional housing units compared to Alternative 1 (No Action). Along with Alternative 5, the Preferred Alternative would have the largest increase in housing supply. Like all alternatives, most new housing is expected to be rental, but the Preferred Alternative would also produce the most new ownership housing among all alternatives. Much of this new ownership housing would be in small-scale developments in Neighborhood Residential zones.

The Preferred Alternative is expected to result in more demolished housing units than all other alternatives. However, those demolished units would tend be older detached homes that are more likely to be owner-occupied and relatively higher cost than other housing types, and the Preferred Alternative is expected to produce significantly more income-restricted affordable housing units through MHA and MFTE than units demolished. Additionally, this alternative, along with Alternative 5, is expected to have the biggest impact on reducing economic displacement by providing the largest increase in the supply of housing.

Compared to No Action, the Preferred Alternative would distribute employment growth across more areas of the city, including in new neighborhood centers and corridors where neighborhood-serving businesses and services are currently scarce.

130th/145th Station Area

This alternative would create a new urban center around the NE 130th St station area. This change would support transit-oriented development and the most housing and job growth compared to the other alternatives.

Equity & Climate Vulnerability Considerations

Housing Affordability

The Preferred Alternative would benefit low-income renter households compared to the No Action Alternative due to its impact on increasing rental housing supply and new affordable housing through MHA and MFTE. However, this benefit would be somewhat smaller than Alternative 5, which focuses more growth into rental housing. The Preferred Alternative would provide the greatest benefits for moderate income-households seeking to access the homeownership market and associated wealth generation opportunities. This is due to the

increased supply and diversity of housing types that can be sold to homeowners. The Preferred Alternative is expected to produce the greatest amount and diversity of new ownership housing among all alternatives.

3.8.3 Mitigation Measures

Incorporated Plan Features

All action alternatives would increase the supply of housing in Seattle, most significantly Alternative 5 (Combined) and the Preferred Alternative, which would reduce competition for housing and slow housing cost increases over time. The action alternatives also focus relatively more future housing production in areas with low displacement risk to reduce development pressure in areas with high displacement risk where rapid market-driven housing production can have localized impacts on households and communities vulnerable to displacement.

Under the action alternatives, the City could also update Comprehensive Plan policies to further address current and future risk of displacement. For example, the Housing Element would add new policies around addressing displacement.

Regulations & Commitments

Seattle's municipal code contains regulations for housing and tenant protections. Below is a summary of these regulations and of existing policies and programs that would mitigate impacts associated with the alternatives. See also **Appendix C** for other state and county measures that reduce impacts such as displacement.

Mandatory Housing Affordability (MHA)

Commercial and multifamily residential development in Seattle is generally subject to MHA, which requires a contribution to affordable housing as a condition of permit issuance. Developers have a choice between reserving a portion of units at affordable prices for low-income households or making a payment to the City's affordable housing fund. Most development in all alternatives would occur in zones that currently have MHA. This would result in production of affordable units on-site (through the performance option) and in investments in production and preservation of affordable housing (through the payment option).

Multifamily Tax Exemption (MFTE)

Since its adoption in 1998, the MFTE program has produced affordable units by incentivizing builders to reserve 20 or 25% of the dwelling units in new multifamily structures at affordable rents or sales prices for low- and moderate-income households. In exchange for on-site affordable housing, the City provides a partial property tax exemption for up to 12 years, with

an option to extend the affordability commitment for a continued tax exemption. MFTE is available in all zones that allow multifamily development. The affordability level of rental dwelling units reserved for income-eligible households varies according to unit size as follows:

- 40% of AMI for congregate residence sleeping rooms
- 40-50% of AMI for small efficiency dwelling units (SEDUs)
- 60% of AMI for studio units
- 70% of AMI for one-bedroom units
- 85% of AMI for two-bedroom units
- 90% of AMI for three-bedroom and larger units

Ownership units provided through MFTE must be affordable at 100% or 120% of AMI depending on unit size.

All alternatives are expected to see a substantial portion of future housing growth in zones where MFTE is available.

Affordable Housing Funding Programs

In addition to MHA and MFTE, which produce units with rent and sales price restrictions through development, several other sources of funding produce and preserve affordable housing and stabilize low-income households in Seattle. The primary funding source is the Federal low-income housing tax credit (LIHTC) program. Locally, the City has a Housing Levy, a voter-approved property tax passed most recently in 2016. ~~Later i~~In 2023, voters approved~~will consider~~ a ~~proposed~~ $970 million Housing Levy renewal. Funds from these and other sources sustain several housing programs operated by the Office of Housing, including:

- The **Rental Housing Program** funds production and preservation of rental housing that serves low-income Seattle residents for a minimum of 50 years.
- The **Homeownership Program** funds the development of new for-sale housing stock sold to low-income, first-time homebuyers at affordable prices for a minimum of 50 years.
- The **Home Repair Program** funds critical health and safety repairs that help low-income homeowners preserve their asset and remain in their homes.
- The **Weatherization Program** funds energy conservation and indoor air quality improvements that support health, enhance living conditions, and lower utility bills for low-income homeowners and renters.

Tenant Protections

Seattle has adopted a suite of tenant protections in recent years. In 2016, the City Council passed legislation banning discrimination against prospective tenants who use alternative forms of income to pay rent, like social security, child support, or unemployment benefits. This expanded existing protections for tenants paying for rent with Federal Section 8 housing vouchers. Renters in Seattle also have protection under the Just Cause Eviction Ordinance,

which requires landlords to have one of 16 "Just Cause reasons" if they want to terminate a tenancy. Other tenant protections help to ensure safe and healthy rental housing, uphold Fair Housing law, and prohibit rent increases in units with housing and building maintenance code violations.

Relocation Assistance

Seattle has two forms of relocation assistance for tenants who are forced to move. The Tenant Relocation Assistance Ordinance (TRAO) provides relocation assistance to low-income households who are considered displaced due to their housing being torn down, substantially renovated, undergoing a change of use, or removing certain rent and income restrictions. In these cases, property owners and developers must obtain a Tenant Relocation License, and income-eligible renters receive relocation assistance of $4,486, paid equally by the property owner the City.

More recently, in 2022 the City Council established Economic Displacement Relocation Assistance (EDRA), which provides financial support to income-eligible tenants if their landlord increases housing costs by 10% or more during a 12-month period. This provides assistance to low-income households displaced not through physical alteration of their housing but housing cost increases.

Equitable Development Initiative (EDI)

EDI was created in 2016 to address displacement resulting from inequitable growth in Seattle. Since then, EDI has awarded funding to dozens of community-driven anti-displacement projects in neighborhoods at high risk of displacement. Funding supports property ownership among Seattle's diverse cultural communities through site acquisition, capital projects, and capacity building.

Other Potential Mitigation Measures

Although not required to address identified impacts, the City could pursue the following kinds of actions to address possible population, employment, and housing conditions.

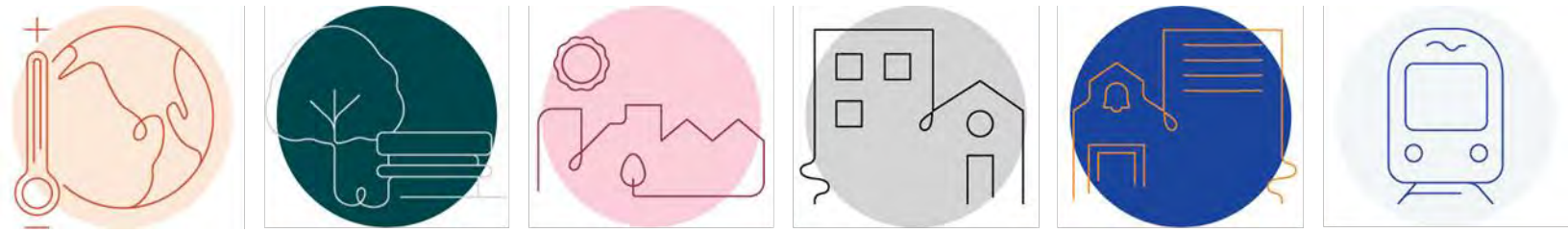
- ~~**Implement MHA requirements in Neighborhood Residential zones.** The City could apply MHA requirements through changes in NR zones. This would increase affordable housing production in Alternatives 3 and 5, which contemplate allowing a greater amount and variety of housing in NR zones.~~
- **Develop an acquisition strategy for naturally occurring affordable housing.**
- **Increase funding for programs combating displacement.** To address the potential for residential, commercial, and cultural displacement under any alternative, the City could pursue various actions that support the stability and retention of existing households, and the preservation and creation of new, cultural institutions and businesses. Examples of potential anti-displacement actions include:

  - Increasing funding for Seattle's Equitable Development Initiative (EDI) to expand the ability of community organizations to acquire and development property in neighborhoods at high risk of displacement.
  - Supporting low-income homeowners to add housing on their property to stay in place and build wealth. Homeowners who have low or fixed incomes may struggle with the rising costs of property ownership, including taxes and maintenance costs, and may also face challenges to adding housing to their property that could generate income or meet their household needs despite current or future zoning capacity that allows additional density. The City could fund programmatic efforts to help homeowners overcome awareness, financing, design, permitting, or other barriers.
  - Strengthen the Office of Economic Development's (OED) small business support programs. OED has provided a range of support services for small businesses, including access to capital, storefront repair, a stabilization fund pilot, and a tenant improvement fund pilot. Resources for these or similar programmatic efforts could mitigate potential commercial displacement pressure.
  - Establish and fund a program that supports tenant or community ownership of rental housing when it becomes available for purchase.
- **Strengthen relocation assistance programs.** As described above, TRAO and ERDA provide relocation assistance to low-income households displaced due to removal or alteration of their housing or increasing housing costs. The City could pursue policy or funding changes that would increase the number of households receiving assistance or the amount of assistance received.
- **Density bonuses:** The City could allow projects that set aside a significant portion of their units as income-restricted affordable housing to receive extra height or floor area.

3.8.4 Significant Unavoidable Adverse Impacts

Over time, additional growth and development will occur in Seattle, and much of this growth will occur through redevelopment. The alternatives vary based on the amount, types, and geographic pattern of existing housing and businesses that may be demolished to make way for new growth. While this can contribute to the risk of physical displacement, that risk is not significantly higher in the action alternatives. Moreover, the benefits in terms of reduced economic displacement pressure and increased production of affordable units offered by the action alternatives outweigh any increased risk of physical displacement. Therefore, no significant unavoidable adverse impacts to population, employment, or housing are expected under any alternative.

3.9 Cultural Resources



Source: Sunita Martini via City of Seattle, 2023.

This section describes the current conditions (affected environment), analyzes the alternatives' potential impacts on cultural resources (which includes historic-period architectural resources and precontact and historic-period archaeological resources), details the current cultural resources policy and regulatory frameworks, and suggests possible mitigation measures. Finally, it summarizes any significant unavoidable adverse impacts.

What are Cultural Resources?

Cultural resources are:

- **Architectural resources** (buildings, structures, sites, landscapes, objects, and districts) that are of the historic period, which is generally 25 years old or older (under the Seattle Landmarks program) or 40 years old or older (National Register of Historic Places)
- **Archaeological resources**, including precontact Native American artifacts, features, and sites; Traditional Cultural Properties; and historic-period artifacts, features, and sites.

Adverse effects or impacts to cultural resources are defined by the Advisory Council on Historic Preservation as impacts that alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register of Historic Places (NRHP) in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association (36 CFR 800.5). Adverse impacts may include reasonably foreseeable impacts caused by the undertaking that may occur later in time, be farther removed in distance, or be cumulative. Below are some examples of adverse impacts on cultural resources:

- Physical destruction or damage to all or part of the resource;
- Moving the resource from its historic location;
- Change of the character of the property's use or of physical features within the resource's setting that contribute to its historic significance; or
- Introduction of visual, atmospheric, or audible elements that diminish the integrity of the resource's significant historic features.

Impacts of the alternatives on cultural resources are considered significant if they result in:

- Substantial changes to or alteration of features or characteristics, or loss (removal or demolition) of a cultural resource that that prevent their eligibility for inclusion as a designated Seattle Landmark (SL), or inclusion in the NRHP, National Historic Landmark (NHL) program, or the Washington Heritage Register (WHR).
- More than a moderate adverse impact (potential loss of or alterations to the physical evidence or tangible evidence of cultural history) to Culturally Important Resources (CIR), which for the purposes of this EIS are important to certain cultural groups or communities, whether or not they are listed or eligible for the SL, NRHP, or WHR.

Resources that have been officially determined not eligible for these registers or considered CIR will not be adversely impacted by the proposed alternatives.

3.9.1 Affected Environment

This section describes the precontact, ethnographic, and historic contexts of the areas within the city as background by which to address the potential for impacts to cultural resources.

Indigenous Settlement Context

Based upon current scientific understandings of the archaeological record, the earliest human occupations in the Pacific Northwest were characterized by highly mobile bands of broad-spectrum foragers. The widespread Clovis culture, the first well-defined cultural complex in North America, has been dated to between 12,800 and 13,200 calibrated years before present (cal. B.P.) (Ames and Maschner 1999:65–66; Kirk and Daugherty 2007:13). Recent research suggests that large stemmed projectile points (i.e., Western Stemmed complex) may have been produced by populations pre-dating Clovis (e.g., Jenkins et al. 2012). Such points have been identified at the Cooper's Ferry site in western Idaho, which has been dated to between 16,560 and 15,280 cal. B.P. (Davis et al. 2019). These early Paleoindian cultures consisted of small, nomadic bands that specialized in hunting a variety of small- to large-sized game animals, including megafauna that went extinct across North America at the end of the Pleistocene (e.g., wooly mammoth [*Mammuthus primigenius*], mastodon [*Mammut americanum*], ancient bison [*Bison antiquus*]) (Kirk and Daugherty 2007:13).

Following the Clovis period, early and middle Archaic populations across western Washington produced large, willow leaf-shaped ("Olcott" phase) projectile points, in addition to lanceolate points and scrapers (Ames and Maschner 1999; Kopperl et al. 2016; Nelson 1990:483). Similar projectile points have been found in sites from the Fraser River Valley in British Columbia down to the margins of the Columbia River, indicating the wide dispersal of related groups across the broader Northwest Coast during this period. Sites containing Olcott material are most commonly documented well inland from the coast along rivers, suggesting that these populations were likely still subsisting largely upon terrestrial plant and animal resources and had not yet developed the extensive reliance upon riverine and coastal food resources observed among later Coast Salish peoples (Kopperl et al. 2016; Nelson 1990:483).

Between approximately 6400 and 2500 cal. B.P., there was a gradual shift across the Northwest Coast to an increasingly heavy reliance on marine and riverine resources for subsistence. This shift coincided with a general trend toward increasing sedentism as more sites were settled along river courses, estuaries, and productive marine environments (Ames and Maschner 1999:93–94; Nelson 1990:483). During this period, settlements began to be occupied on a seasonal basis. Larger, denser artifact concentrations have been identified within sites dating from 6400 to 2400 cal. B.P., and deep shell middens have been dated to as early as 5,200 years ago (Larson and Lewarch 1995; Mierendorf 1986:57; Wessen 1988). It was during this time that coastal and neighboring inland communities developed their complex suites of lithic, bone, and antler tool technologies suited for marine mammal hunting, riverine fishing, and the

further exploitation of terrestrial plant and animal resources (Ames and Maschner 1993:93–95; Blukis Onat et al. 1980:29–30; Kopperl et al. 2016:117–118).

Along with steady population growth and increasingly intensive resource utilization across the broader Northwest Coast, Late Pacific (2400–200 cal. B.P.) precontact archaeological sites in the region demonstrate the emergence of status differentiation and complex social hierarchies (Ames and Maschner 1999:95–96). Increased reliance on stored foods and controlled access to resources, including salmon and shellfish, also developed during this period. By this time, the general ethnographic (prior to Euroamerican influence) pattern observed along the Northwest Coast had become well-developed, although these societies saw swift and dramatic changes with the arrival of Euroamerican explorers, traders, and settlers beginning in the late 1700s (Ames and Maschner 1999:95–96, 112).

The EIS study area is within the traditional territory of the Lushootseed-speaking Duwamish people. The settlements of this ethnographically documented Coast Salish group were principally located along the Duwamish, Black, and Cedar Rivers, as well as along the coasts of Puget Sound and Lake Washington in the vicinity of present-day Seattle (Duwamish Tribal Services 2018; Ruby and Brown 1992:72). The Duwamish were part of the broader Southern Coast Salish culture, which was generally adapted toward the intensive utilization of marine and riverine resources (Suttles and Lane 1990). A principal division among the Duwamish existed between the Sxwaldja'bc ("saltwater dwellers") who lived in settlements on Puget Sound and the Xatcua'bc ("lake dwellers") who lived along the shores of Lake Washington. The latter, as well as Duwamish groups living along the interior rivers of the region, were considered to be poorer and lower-status than the coastal communities (Hilbert et al. 2001:45; Ruby and Brown 1992:72–73; Suttles and Lane 1990:485–486; Swanton 1952:26). The three main peoples with winter settlements within the Seattle area were the dùd¢w...abí ("People of the Inside"), who lived primarily along the Duwamish River; the Hachooabsh ("Lake People"), who lived along the shores of Lake Washington; and the Shilshoolabsh ("People of Tucked Away Inside"), who lived primarily around Salmon Bay in what is today the Ballard neighborhood. The anglicized version of the first of these groups, Duwamish, was eventually applied as a general name covering all of the distinct populations living in the greater Seattle area (Duwamish Tribal Services 2018; Hilbert et al. 2001:45–50; Thrush 2007:23).

While Seattle represents the ancestral lands of the Duwamish, Hachooabsh, and Shilshoolabsh, Coast Salish groups living throughout Puget Sound, including the Snoqualmie, Suquamish, Muckleshoot, Stillaguamish, and Tulalip, routinely visited the area. These groups utilized Elliott Bay and the surrounding environment for hunting, gathering, and fishing purposes, as well as to trade with resident communities (Haeberlin and Gunther 1930; Spier 1936; Swanton 1952).

Like other Southern Coast Salish peoples, the Duwamish relied heavily upon salmon and other fish for subsistence and utilized a diverse suite of technologies to harvest them in different settings. They made use of trolling, seine, and gill net technologies to harvest fish in Puget Sound, while weirs, nets, gaff hooks, harpoons, and spears were all employed in rivers (Suttles and Lane 1990:488–489). Terrestrial mammals, especially black-tailed deer and elk were also

hunted by the Duwamish and neighboring Tribes using the bow and arrow, and they gathered a great variety of plant foods, including edible roots, bulbs, and berries (Duwamish Tribal Services 2018; Gunther 1945; Suttles and Lane 1990:489).

The Duwamish lived a semi-sedentary lifestyle, spending part of the year in permanent winter settlements and the warmer months in temporary encampments from which they fished, hunted, and gathered plant resources. Smaller bands would travel across their territory to hunt and forage for plant resources during the summer months, returning to their permanent settlements for the ceremonially rich winter season and to intensively fish in the spring and autumn (Duwamish Tribal Services 2018; Suttles and Lane 1990).

In 1855, members of the Duwamish and neighboring Puget Sound Tribes signed the Treaty of Point Elliott, which directed the removal of Tribal members to reservations. The Duwamish were ordered to relocate to the Port Madison Reservation, along with the Suquamish (Lane 1975:3–4). Created by ships dumping their ballast at the Seattle waterfront before loading their cargoes, Ballast Island (45KI1189) became an important gathering place for Tribal members from across Washington, British Columbia, and Alaska, as well as a permanent residence for Duwamish peoples forced from their homes elsewhere by the 1880s. Following the 1865 passage of an ordinance banning Tribal members from residing within the city limits, Ballast Island was a location in Seattle that the Duwamish and visiting Native peoples were grudgingly permitted to inhabit because it was not considered to be a part of the city proper. Following repeated attempts by the city government to expel the Tribal occupants of the island in the 1890s, waterfront developments eventually encroached on Ballast Island in 1898 and Tribal peoples residing there were forced to leave (Curti et al. 2020; Duwamish Tribal Services 2018; Elder 2014). The site is today recognized as a traditional cultural property (TCP) for numerous Tribes of the Puget Sound region and is listed in the NRHP and WHR (Curti et al. 2020). Many Duwamish had also remained along the Black River in defiance of federal government orders but were likewise removed from their ancestral lands by the early 1900s (Lewarch et al. 1996:3–13).

The Duwamish Indian Tribe petitioned for federal recognition in 1979. In 2001, the federal government rejected the petition, reversing the decision of the previous administration to recognize its Tribal status. The Duwamish Indian community continues to pursue recognition, build their community, and maintain their cultural traditions (Duwamish Tribal Services 2018; Thrush 2007:196–197).

At least 11 Indigenous winter settlements were located within the Seattle area when non-Indigenous explorers and settlers first began arriving in Puget Sound. Several of these settlements were located around the mouth of the Duwamish River and the expansive tidal marshes that once stretched across the area now occupied by downtown Seattle, as well as along the lower reaches of the Duwamish River. The settlement of tõ...ul...altù ("where herring live" or "herring house"), was situated to the west of the mouth of the Duwamish River under the West Seattle bluff. An unknown Euroamerican settler burned the town down in 1893, and its name was eventually given to Terminal 107 Park (Hilbert et al. 2001:46; Thrush 2007:234).

The winter settlement of y¢l•çad (“basketry cap”) was named for the distinctive woven hats worn by peoples such as the Yakama, perhaps because its residents participated in trade networks that spanned the Cascades. This settlement was located along the west bank of the Duwamish River west of Kellogg Island (Dailey 2020; Hilbert et al. 2001:119; Thrush 2007:236–237). A third settlement, dùç•ó¢d (“Place of the Fish Spear”), was located atop a large flat next to the Duwamish River at what is presently the north end of Boeing Field (Hilbert et al. 2001:47; Thrush 2007:240). To the north, in the vicinity of the Old Rainier Brewery along U.S. Interstate 5 (I-5), the settlement of tutõ¿aqs (“Little-Bit-Straight Point”) included three longhouses as well as a small stockade and lookout used to guard settlements up the Duwamish River (Hilbert et al. 2001:61; Thrush 2007:235).

Three winter settlements were located in the area of present-day downtown Seattle between the SoDo and Belltown neighborhoods. The large settlement of sä•ä¢l...ali• (“Little Crossing-Over Place”) was situated on both sides of a promontory overlooking a tidal marsh in the vicinity of present King Street Station and included up to eight longhouses (Hilbert et al. 2001:46; Thrush 2007:229). The smaller settlement of ß¢l½‹qabiù (“Grounds of the Leader’s Camp”) was located between Cherry and Seneca Streets and First and Second Avenues, while the settlement of bab‹çab (“prairies”) was located in the vicinity of the present-day Belltown neighborhood (Hilbert et al. 2001:60–64; Thrush 2007:228–229).

The settlement of íilíul (“Tucked Away Inside”) included two large longhouses measuring 60 by 120 feet and a larger potlatch house along the north shore of Salmon Bay. It was inhabited by the Shilshoolabsh, or Shilshole, people, who continued living there until it was destroyed during the construction of the Hiram M. Chittenden Locks in the 1910s (Hilbert et al. 2001:45–46; Thrush 2007:222-223). An archaeologically well-documented settlement at West Point, paß‹ca¿•u (“Brush Spread on the Water”) was used in the nineteenth century by Duwamish peoples displaced from elsewhere in the area (Thrush 2007:226). Situated along the north shore of Elliott Bay before the lowering of Lake Washington in 1916, the settlement of s¿uw•¿ (“Little Canoe Channel”) included up to five longhouses and an extensive fishing weir at the mouth of Ravenna Creek (Hilbert et al. 2001:78; Thrush 2007:251). The settlement of dù½õb¢d (“Silenced Place”), at the mouth of Thornton Creek along the west shore of Lake Washington, included at least one longhouse (Thrush 2007:254).

The City of Seattle’s namesake is the respected leader siʔał. The first ləliʔaʔkʷbixʷ (non-Indigenous colonizers) built this young village upon the ancient inter-Tribal trade, commercial, cultural, and governmental hub of the Northwest Coast, dᶻidᶻəlaĺič. The connection the ʔaciłtalbixʷ (all of the Puget Sound People, often translated as the simplified and colonized terms “Native American” or “Indian”) have to the larger Puget Sound region reaches back into history 13 millennia and continues into 2024. This connection and legacy of ecological stewardship, cultural heritage, and sustainable environmental practices continue to be supported archaeologically and Ethno-historically for over 12,000 years, since time immemorial (Spiry, Martin, and Moses 2024).

Non-Indigenous Settlement Context

Early Non-Indigenous Settlement

Non-Indigenous peoples began visiting the Puget Sound Region in 1792 when George Vancouver and his crew explored the area. Within the next 100 years, Native populations plummeted due to repeated outbreaks of introduced diseases such as smallpox, influenza, and typhoid fever (Boyd 1990; Suttles and Lane 1990). The Treaty of Washington in 1852 conveyed the territory to the United States, and the Donation Land Claim Act drew settlers into land occupied by the Duwamish and their neighbors. In 1855, members of the Duwamish and neighboring Puget Sound tribes signed the Treaty of Point Elliott, which provided for the removal of Tribal members to reservations, including the Port Madison Reservation (Suquamish/Fort Kitsap), Lummi, Swinomish, and Tulalip. Some Duwamish people continued to live in and around Seattle, maintaining friendly relations, working for, and trading with incoming settlers. Many others, meanwhile, relocated to the Port Madison Reservation, but due to undesirable conditions were compelled to leave. Many then attempted to return to their ancestral lands, and a few were able to claim or purchase land (Ruby and Brown 1992; Thrush 2007).

As non-Indigenous settlement increased, Tribal lands and fishing rights continued to be eroded through the late 1800s and 1900s. Non-Indigenous settlers purchased lands that were used by Natives as fishing areas and prevented access, and, as the commercial fishing industry grew, the State applied fishing regulations and fees not only to the industry but to the Tribes. These and other such actions culminated in the late 1900s, in a series of lawsuits and court cases that upheld certain treaty rights (Dougherty 2020; Marino 1990; Ruby and Brown 1992). The federally recognized Muckleshoot, Snoqualmie, Suquamish, and Tulalip Tribes are the descendant Tribes that represent the various tribes and bands with territorial interests in Seattle, that were signers of the Point Elliott Treaty. The Duwamish Tribe is not currently federally recognized but continues to fight for this distinction.

It was in 1851 that the first non-Indigenous settlers arrived in the Seattle area. In the Duwamish area (Area 7), a party that included Luther Collins, Jacob Maple, Samuel Maple, and Henry Van Asselt filed claims along the Duwamish River on lands that now make up Georgetown. Farming became the main industry in this area (Wilma 2001a).

Soon after, in what is now downtown Seattle (Area 4), the Denny Party arrived. They included Arthur A. Denny and his brother David T., John N. Low, Carson D. Boren, William N. Bell, Charles C. Terry and his brother Lee, and their families. These early settlers moved to the east shore of Elliott Bay in 1852, to take advantage of the deep-water harbor, and filed donation land claims. They encouraged additional settlement by adjusting their land claims to accommodate new arrivals, such as sawmill owner, Henry L. Yesler, and filed the first plat for the town of Seattle (Denny 1888:7–13, 16–17; Fiset 2001a; U.S. Surveyor General [USSG] 1856, 1863).

Some of these earliest non-Indigenous settlers in what is now the southern end of the Queen Anne/Magnolia area (Area 3), included members of the Denny party, David T. Denny and his

wife, Louisa Boren Denny, who filed a donation land claim for just over 320 acres. Their neighbor to the north, Thomas Mercer, filed for a land claim on 160 acres (General Land Office [GLO] 1866a, 1866b). Dr. Henry Smith, with his wife, mother, and sister, and Erasmus M. Smithers settled in what is now the Interbay area of the Queen Anne/Magnolia area, establishing small farms, while David Standler settled on land to the north along Salmon Bay, and John Ross and William A. Strickler (alternately spelled Sticken) settled to the northeast near the north end of Lake Union, all filing land claims (GLO 1866c, 1871a, 1871b, 1872, 1877; Wilma 2001b; USSG 1871).

The earliest land claims in the NW Seattle area (Area 1) were Edmund Carr, who filed a donation land claim for 137 acres at the southwestern end of what is now the Ballard neighborhood and Ira W. Utter, who filed a land claim for 156.60 acres at the north shore of Salmon Bay (GLO 1871c, 1871d). In the Capitol Hill/Central District (Area 5), John H. Nagel (also spelled Nagle) filed a land claim for 161 acres south of present-day Volunteer Park, while Henry L. Yesler's 185.74-acre claim with his wife Sarah B. Yesler was in what is now the Central District, centered on the present-day Garfield Playfield (GLO 1866d, 1871e).

Two land claims in the northern end of the SE Seattle area (Area 8), were filed by John C. Holgate and Edward Hanford and his wife, Abigail Jane (Holgate) Hanford. Each was for 320 acres in what is now the Beacon Hill neighborhood (GLO 1867, 1871f; Lange 2000a).

More settlers followed in the 1850s, made claims, and supported themselves by farming and logging, or by establishing small retail or commercial enterprises (Wilma 2001a). Most of these earliest farms in the Seattle area were small family operations that raised some fruit, vegetables (potatoes), and a few chickens or livestock; these farms were used primarily to sustain the family, not for resale. In the Duwamish, some farmers grew hops and hired local Indigenous peoples to work the harvest (Gregory 2009; Wilma 2001c). Logging, which began with local men working with oxen and small timber mills, became the primary industry of this period (Caldbick 2014; Denny 1888:16–22; Fiset 2001a). Over time, larger mills were constructed in the area and the industry offered steady employment for incoming settlers, and much of the Seattle neighborhoods were logged off (Sanborn Map Co. 1884, 1888, 1893).

Also in 1852, King County was established, with Seattle as the county seat, and the following year, Congress split the Washington Territory out of Oregon Territory (Crowley 2006).

Other non-Indigenous settlers arrived from the east and opened small shops in the nascent city, providing services to other settlers. At least two of these non-Indigenous settlers were African Americans. One was Manuel Lopez, who came to Seattle in 1852 and established a barber shop, and another was William Grose (or Groce or Gross) who arrived in 1859 and opened a restaurant (Long 2006; Raftery 2021). For more information about Grose, see the Capitol Hill/Central District (Area 5).

Around 1855, the U.S. Navy anchored the sloop *Decatur* just offshore in Puget Sound to defend the settlers who feared attacks from Native peoples. The settlers also built blockhouses and hosted militias in response to skirmishes with frustrated Natives, dissatisfied with the

reservations. After the Battle of Seattle in 1856, the government established the Muckleshoot Reservation southeast of Seattle on the White River in 1857 (Crowley and Wilma 2006; Williams 2015; Muckleshoot Indian Tribe 2023). In 1861, Seattle won the right to build the Territorial University. The school would develop into the University of Washington (UW) (Crowley 2006; Williams 2015). In 1865, the Board of Trustees of the Town of Seattle passed an ordinance banning Native Americans from living in Seattle, and although the law was not readopted when Seattle was reincorporated in 1869, discrimination against Native Americans continued. By that time, the population of settlers in Seattle had risen to 302, and many of them were working to grow the town into something more substantial. While most of the early industry and commercial activity had grown along the eastern shore of Elliott Bay, sparse residential and family farms were beginning to pop up in the areas surrounding Seattle's central core (Bagley 1929; Ott 2014).

Development of Seattle

In the 1870s, the discovery of large deposits of coal near present-day Newcastle and Renton created a need for transportation to Seattle docks on Elliott Bay. Initially, the coal was transported on barges across Lake Washington, then unloaded to wagons and transported overland to Lake Union, where it would be loaded back onto barges and shipped southwest across the lake. Then the coal was once again unloaded onto wagons for the final leg of the route to Elliott Bay. In an attempt to simplify this onerous shipping system, a narrow-gauge rail line was constructed in 1872 between Lake Union's south shore and the coal dock on Elliott Bay. Five short years later, the line was abandoned as the Seattle and Walla Walla Railroad (S&WW) was constructed by the enterprising locals in Seattle from Elliott Bay south to the coal fields near Renton and then north to those near present-day Newcastle (Link 2004:3; MacIntosh and Crowley 1999).

The S&WW was incorporated as a response to Northern Pacific Railroad's choice for its western terminus. In the early 1870s, Northern Pacific Railroad representatives toured the Puget Sound area looking at locations for their transcontinental line west coast terminus. Seattle, Tacoma, and other towns made substantial offers to the railroad company in hopes of enticing them to choose their town. In 1873, the railroad selected Commencement Bay near Tacoma. Angered, Seattle's leaders and residents responded by forming the S&WW. When complete, the S&WW line carried vast quantities of coal from the mining region in southern King County to Seattle for export. In 1880, successful railroad magnate, Henry Villard, purchased the S&WW and renamed it the Columbia & Puget Sound Railroad (C&PS). In 1884, the Northern Pacific Railroad built a spur line to Seattle, and the following year, in 1885, the Seattle, Lake Shore & Eastern (SLS&E) built a rail line from Smith Cove to Newcastle and Issaquah, spurring additional growth (Chesley 2009; MacIntosh and Wilma 1999; Lange 2000b; Williams 2013).

Seattle's economy boomed with shipping, railroads, timber extraction and milling, coal mining and shipping, commercial and industrial manufacturing such as iron works, and service industry support. At this time, Seattle's economy was closely tied to other Pacific ports, especially those in California. At various times, a substantial percentage of lumber shipped from

Seattle went to San Francisco to aid in its reconstruction from catastrophic fires and, later, the 1906 earthquake that was accompanied by a fire that destroyed some 25,000 buildings. The close connection between these ports can be seen in the creation of Ballast Island, an artificial landform on the Seattle waterfront, which was largely made up of rock mined from outcrops in San Francisco and dumped in Elliott Harbor to make space for the Seattle products shipped in return sailings. Ballast Island is a traditional cultural property (TCP) that is important to the area's Tribes (Curti, et al. 2020). This rise in production created jobs and encouraged population growth (Fiset 2001a).

In response to Seattle's growth, the pace of construction in the surrounding neighborhoods began accelerating in the late 1880s and early 1890s. Over time, additional sawmills were constructed, and existing mills were enlarged throughout the area with the addition of planing mills, molding cutters, and other specialty manufacture. The industry offered steady employment for incoming settlers and much of the Seattle neighborhoods were logged off (Sanborn Map Co. 1884, 1888, 1893). Mills and other commercial ventures were built on the available lands, manufacturing companies expanded, and support services such as restaurants, hotels, breweries, laundries, creameries, soap works, and other similar enterprises were established throughout the neighborhoods. In addition, houses were constructed to accommodate increasing numbers of employees, both management and labor, and business owners (Fiset 2001a; Sanborn Map Co. 1884, 1888, 1893).

At first many people in Seattle welcomed the city's Chinese residents for their labor. The Chinese had built many of Seattle's streets and railroads, operated shops and businesses, worked in mills, logging camps, mining, and the fishing industry, and were domestic workers. By the 1880s, they faced increased discrimination and abuse, as other laborers perceived greater competition for jobs. Following the passage of the Federal Chinese Exclusion Act in 1882, hostilities continued to rise against the area's remaining Chinese inhabitants. Many Chinese living in Seattle lost jobs and many left town fearing violence. Then, in 1886 an angry crowd of Seattle residents swarmed into Chinatown, forced more than 300 of the city's Chinese population to leave the city via ship, and destroyed many Chinese homes. The governor declared martial law and imposed a curfew, which was enforced by patrolling military troops. Later, crowds forced an additional 110 Chinese to leave town and many more left on their own. By the time Martial law was rescinded, fewer than 30 Chinese residents remained (Dougherty 2013; Riddle 2014). The Chinese Exclusion Act was extended for 10 years in 1892, made permanent in 1902, and was finally repealed in 1943 (National Archives and Records Administration [NARA] 2023).

Cable cars and electric streetcars crisscrossed Seattle's neighborhoods, ferries transported passengers across Lake Union, and systems of staircases, first constructed of wood and later of concrete, were built for ease of travel over the area's hilly topography (Fiset 2001a; Thompson and Marr 2013). According to Sanborn maps, in 1884 the population of Seattle was 7,000 persons; this number more than doubled by 1888 to 16,000 (Sanborn Map Co. 1884, 1888).

Like many cities in the United States, Seattle was devastated by fire. The Great Seattle Fire occurred in 1889 and leveled the city's 18-block waterfront and 40 blocks of the city center. The fire destroyed wood-frame buildings and structures, and those constructed of brick and stone, including wharves, piers, depots, mills, warehouses, businesses, offices, banks, stores, hotels, apartment buildings, and some residences. Rebuilding began almost immediately. The City widened some streets and raised others, implemented a new building code, banned wood buildings in the fire zone, and established a city water works (Caldbick 2020a, 2020b). Many of Seattle's sawmills that had been destroyed in the fire relocated to the north side of Salmon Bay, to what is now Ballard (Wilma 2001b).

After the fire, in 1892, the Great Northern Railway Company's president, James J. Hill, constructed his line to Seattle that crossed Salmon Bay and Interbay to Seattle, and built docks, a grain terminal, grain elevator and warehouse at Smith Cove to facilitate maritime commerce with the Far East. Other private docks and warehouses were also built in the area (McClary 2013). In 1895, the UW relocated from the downtown area to the Brooklyn neighborhood in NE Seattle (Crowley 2006). For more information about the UW, see NE Seattle (Area 2).

The discovery of gold in 1896 in the Klondike region of the Yukon Territory, in western Canada, impacted Seattle's development with long-lasting economic benefits. Seattle was uniquely positioned as the jumping-off point for thousands of miners headed to the gold fields, and as a supplier to those miners with the provisions they needed for the trek. The Klondike gold rush triggered a great need for Seattle's shipbuilders, merchants, steamships, and railroads, and in return, millions of dollars flooded into Seattle's economy and were used by individuals to open shops and stores, create transportation services, and construct buildings, and by the municipality to fund infrastructure improvements such as roads, sewer and water systems, and ports. The Klondike gold rush cemented Seattle's reputation as a successful port city and hub for shipbuilding, transportation, and business (Tate 2004).

Around the turn of the twentieth century, construction in Seattle's neighborhoods included educational buildings, religious facilities, and multi-unit apartment buildings in support of the rapidly expanding population (Baist 1905; Fiset 2001a). Additionally, religious organizations, commercial enterprises, and industrial operations began upgrading their wood-frame buildings with more substantial masonry versions in the wake of the fire (Link 2004:6). Industry boomed as well, spreading north and south of Seattle to more accommodating topography and expansive rail and waterway transportation systems (Langloe 1946). Private wharves, piers, warehouses, and mills were built south of the city, many were linked to the Northern Pacific lines to handle freight shipped into and out of Seattle. It was around 1900 that Seattle's Chinese population finally recovered, and Chinatown began to prosper once again (Dougherty 2013; Sanborn Map Co. 1905, 1928; Wilma 2001a).

After the turn of the twentieth century, the City of Seattle embraced the progressive era with a series of planned projects, including annexing a series of suburban towns, hiring the famed Olmsted Brothers landscape architects to create plans for parks, scenic boulevards, and playgrounds, built utilities and schools in the outlying neighborhoods, and began paving roads.

(Crowley 2006). Although Seattle established a park commission in 1890 and had purchased parks over the years, the commission was unable to create a citywide parks plan. In 1903, Seattle hired the Olmsted Brothers Landscape Architects firm to develop plans for Seattle parks. That same year, John Charles Olmsted, his assistant Percy Jones, and park commissioners toured and surveyed the city for a month. When Olmsted submitted his report to the City Council, it laid out a citywide system of parks interconnected by parkways and boulevards and included playgrounds and meadows. The report stressed the importance of purchasing land across the city that had access to water and wooded areas, and that contains important views of mountains, water, and forests. The report recommended certain properties to purchase and included design recommendations for the city's existing parks. The plan was approved by the City Council in November 1903. Olmsted continued to advise the city over the years on its development of the parks system, and also worked with the UW board of regents on improvements for the campus (Beckner and Perrin 2016; Williams 1999). In 2016, *Seattle's Olmsted Parks and Boulevards (1903–68)* was listed in the NRHP under a Multiple Property Documentation form (Beckner and Perrin 2016).

By 1904, Seattle's increasingly diverse population swelled to over 150,000. The city was ethnically diverse, with established Chinese, Japanese, Italian, and Jewish communities just outside the downtown area. Between 1905 and 1910, Seattle annexed many of the small towns and neighborhoods north and south of the city center, nearly tripling the size of the city. Many of these communities had petitioned for annexation due to their inability to keep up with infrastructure and safety concerns. Progressive city leaders funded projects for public benefit including paving roads, constructing utilities, and building schools. They established the Pike Place Public Market in 1907 and in 1908 again hired the Olmsted Brothers for a report on the newly annexed areas of the city (Beckner and Perrin 2016; City of Seattle 2023a; Crowley 2006; Sanborn Map Co. 1905; Williams 1999; Wilma 2001a).

In 1909, Seattle hosted a world's fair on the campus of the UW in the Brooklyn neighborhood. The 250-acre fairgrounds was designed by the Olmsted Brothers. The fair's planners requested the Olmsted Brothers firm develop landscaping plans for the fair's 250-acre grounds on the UW campus. Seattle residents celebrated the city's accomplishments with nearly four million visitors at the Alaska-Yukon-Pacific Exposition (Beckner and Perrin 2016; Williams 1999).

The onset of the 1910s saw big changes for the now booming Seattle. Between 1912 and 1917, the U.S. Army Corps of Engineers (USACE) constructed a canal between Puget Sound and Lake Washington following Ross Creek, which had been widened ca. 1885 for use as a log canal (Chrzastowski 1983:6). The Hiram M. Chittenden/Ballard Locks was completed in 1917, opening a major shipping route that connected Lake Washington, Lake Union, and Salmon Bay Waterway to Puget Sound. The project was funded by King County and the federal government. Simultaneous to the construction of the Canal, the City of Seattle completed bridge construction, street grading, and built the Third Avenue West Tunnel to provide a route for utilities to pass under the new Canal (Fiset 2001a; Walton Potter 1977:12).

Other large projects during that time included the flattening of Denny Hill and streets north of downtown Seattle, known as regrades, which allowed for easier transportation routes in and out of the city (Link 2004:8). Much of the earth removed in the regrades was used to fill in wetlands and tidal flats. In 1912, the Great Northern docks at Smith Cove were sold to the newly created Port of Seattle for construction of a deep-sea terminal. The Port's comprehensive plan also included the construction of Fisherman's Terminal on Salmon Bay, the Bell Street Pier, wharves and warehouses on the East Waterway pier and a second pier on the East Waterway, a public wharf and warehouse at the end of Bell Street, a grain elevator at Hanford Street, and a new ferry service on Lake Washington (Oldham 2020).

Additionally, man-made alterations along the Duwamish River beginning in 1913—rerouting, straightening, and channelizing the river, and draining, dredging, and filling tidelands—and extensive logging, created land for agriculture and industry. These actions destroyed the Duwamish Tribe's traditional uses of the river to fish, gather and hunt. The dredged material was used to construct Harbor Island, which split the mouth of the river into two channels. The Port of Seattle would later plan extensive terminals on Harbor Island (Oldham 2020; Updegrave 2016; Wilma 2001c). This industrial growth created additional employment opportunities and more residences and apartment buildings were constructed in Seattle's neighborhoods to house the influx of needed workers. Seattle's population rose to 456,000 by 1928 (Crowley 2006; Sanborn Map Co. 1905, 1928).

In 1923, Seattle City Council passed the city's first zoning ordinance. Prior to its passage, the city had relied on the irregular issuance and amendment of Building Ordinances, that were largely building codes. These building ordinances defined building terminology, specified construction materials and methods by building class, described the role of the building inspector and Fire Marshall, laid out permitting procedures, and spelled out mandatory requirements for each class of building (fireproof, mill, masonry, and frame buildings), and type of building (residential, business, commercial, manufacturing, and industrial) (Seattle Building Code Commission 1909:1–10, 11–94). Conforming to these building ordinances, developers constructed a mix of single- and multi-family residences alongside boarding and lodging houses, and small commercial strips outside of the downtown core in neighborhoods across the city (Eliason 2018).

In January 1920, the city council passed Ordinance 40407, which established the City Zoning Commission and defined its role. The first members of the commission consisted of the City Engineer, Superintendent of Buildings, a Park Trustee, and six members appointed by the Mayor. The commission's first job was to divide the city into zones or districts and write ordinances that would "specify the uses to which property in each district may be devoted" (Seattle City Council 1920:2; Seattle Zoning Commission 1920a).

Through 1920, the commission heard testimony on neighborhood concerns and gathered information about zoning. Residents requested the commission address issues caused by meat packing plants and stockyards adjacent to residential neighborhoods, and tackle parking issues. The commission collected zoning data from cities around the country, including Portland, St.

Louis, Cincinnati, Memphis, New York, Washington D.C., and others (Seattle Zoning Commission 1920a, 1920b, 1920c). In January the following year, the commission hired Harland Bartholomew a "zoning expert" and city planning engineer from St. Louis, Missouri, and a public meeting was held in February to introduce Bartholomew and discuss city zoning (Seattle Zoning Commission 1921a).

Bartholomew suggested that Seattle be divided into five districts by use and recommended that the commission consider building height, building area per parcel, and density of occupancy within each of the districts (Seattle Zoning Commission 1921a). Working with the Building Code Commission, the zoning commission developed a proposed zoning report, presented the report to the City Council, and held public meetings to share each neighborhood's proposed zoning (Seattle Zoning Commission 1921b). Throughout 1922, the commission received petitions from numerous university, hospital, ecclesiastic, and industry representatives, improvement clubs, property owners, neighborhood groups, and business owners requesting changes to zoning that affected them; some of these were approved by the commission and some were denied (Seattle Zoning Commission 1922a, 1922b).

In January 1923, the zoning commission approved the draft zoning ordinance and presented it to the City Council. During the months that followed, the commission continued to review petitions for changes and make amendments to the draft, which they forwarded to the City Council (Seattle Zoning Commission 1923). In June 1923, the Council signed the zoning ordinance (Ordinance 45382), presented it to the mayor who approved it that same month (Seattle City Council 1923).

The ordinance divided the city into six different "use districts," which included the First Residence, Second Residence, Business, Commercial, Manufacturing, and Industrial Districts. Permitted in the First Residence Districts were single family dwellings, schools, churches, parks, playgrounds, art galleries, libraries, private conservatories, educational housing, and railroad stations. In the Second Residence Districts, zoning allowed for all First Residence uses plus dwellings, flats, apartments, boarding and lodging houses, hotels, clubs or fraternal organizations, and medical and philanthropic institutions. Within the Business Districts, both First and Second Residence uses were permitted plus stores, offices, banks, restaurants, service stations, police or fire stations, printing office, telephone/telegraph office, theaters, dance halls, skating rinks, retail trades or shops, automobile salesrooms and garages, hand laundries, and the like. In Commercial Districts, the zoning ordinance permitted all of the First and Second Residence, and Business uses, and allowed for any trade or industry except for 75 specific manufacturing industries that were enumerated in the ordinance. In the Manufacturing Districts, the ordinance allowed all of the First Residence, Second Residence, Business, and Commercial uses except for a list of 16 industries. Most of the excepted industries were listed as "objectionable" due to "the emission of dangerous, unwholesome, foul, nauseous or offensive gases, odors or fumes" (Seattle City Council 1923). Finally, in the Industrial Districts, all lawful uses were permitted under the zoning ordinance. Between its passage in 1923 and its repeal and replacement in 1957, the zoning ordinance was amended over 600 times (Seattle City Clerk 2023).

In many new neighborhood subdivisions, discriminatory racial restrictions were entered into the deeds. These restrictions that prohibited the use, sale, or lease of a property to persons of color and other such discriminatory classifications became common after a 1926 U.S. Supreme Court case, *Corrigan et al. v. Buckley*, ruled that such covenants were not prohibited by law. In 1948, in *Shelley v. Kraemer*, the court reversed its earlier opinion and found that such racial deed restrictions violated the Equal Protection Clause of the Fourteenth Amendment. However, it remained legal to discriminate on the basis of race or ethnicity in the rental or sale of housing until 1968, when Congress passed the Housing Rights Act. Although now illegal, such racially restrictive language remains in many deeds in many of Seattle's neighborhoods (LII 2021, 2023; University of Washington [UW] 2020a). For more specific information about racially restrictive covenants in Seattle's neighborhoods, see each of the analysis areas below.

Like most of the United States, the Great Depression hit Seattle hard, as the area's industries faltered, jobs were lost, and subsequently, the population fell. The arrival of World War II and the corresponding growth in war-supporting industries slowed the decline. In 1942, all the Japanese residents on the West Coast—including over 7,000 Japanese Americans in Seattle—were forcibly removed and incarcerated for the duration of World War II by President Roosevelt's executive order 9066. After the war, many never returned to the area, many lost their businesses and homes, and over time, many of their former farmlands were developed (Studio TJP 2021).

During this time, the city's earliest residential neighborhoods were in flux due to pressure of commercial and industrial interests. Additionally, the 1949 earthquake, which damaged numerous buildings, hastened the shift away from mixed residential and commercial neighborhoods towards those with a mix of commercial and industrial, as city officials sought to protect people from falling debris of unreinforced masonry buildings. The gradual rebuilding began in the late 1950s, in part stimulated by the rezoning of some of Seattle's neighborhoods to general manufacturing (Fiset 2001a; Link 2004:14; Thompson and Marr 2013).

In June 1957, the 1923 zoning ordinance was repealed and replaced with Comprehensive Zoning Ordinance 86300 (Seattle City Council 1957). One of the biggest zoning changes implemented under this ordinance included the classification of eight residential zones (R zones), which allowed for a mix of housing types and population densities plus some essential public services' facilities. These comprised three categories of single-family residence zones to "promote and protect various densities and uniformity of development within each" zone; two classes of duplex residence zones; and two classes of multiple family residence zones (Seattle City Council 1957). The ordinance also included three categories of shopping and business zones (B zones); two classes of commercial zones (C zones); and three categories of manufacturing zones (M, IG, and IH zones) (Seattle City Council 1957). The City Council amended Ordinance 86300 over 22,000 times before 1980 (Seattle City Clerk 2023).

As in many parts of the country, in 1957, the city implemented an Urban Renewal Program (Ordinance 86767) that altered the character of some of Seattle's neighborhoods. Defining areas as "blighted" due to what was perceived as deteriorated housing or unsanitary living

conditions, the Planning Commission sought to use eminent domain to clear and redevelop areas of the city (City of Seattle 2023b). These projects were financed by federal funds authorized under the Washington State's Urban Renewal Law that passed in 1957. Even though the city found that these actions would unequally displace more persons of color, the plan moved forward, touting the benefits of eradicating blight and revitalizing communities. The city found nearly 1,400 acres of the city met the various classifications of blight and would need some form of urban renewal as treatment. By mid-1968, over 1,000 structures had been demolished due to "code noncompliance" (City of Seattle 2023c). Public hearings found residents in support of and in opposition to the program, and by 1974, the Federal Urban Renewal program was ended. In 1984, the City reported that the program failed to meet many objectives and in 2021, the City Council apologized, condemned the displacement of persons of color caused by the program, and directed city departments to make amends for the injustices caused by the program (City of Seattle 2023b).

Years in the planning, work on I-5 through Washington began in 1959. The freeway aligned north–south along the east side of Eastlake Avenue E, cutting many neighborhoods in half, disrupting traffic patterns and routes, and introducing visual and auditory impacts. Much of I-5 through Seattle was completed in 1967, but the entire I-5 project was completed in 1969 (Dougherty 2010).

While not targeted by the Urban Renewal program, some of Seattle's neighborhoods such as Queen Anne pushed back against zoning changes in the 1960s–1970s, as they sought to protect their neighborhood character and historic buildings. In 1968 and 1970, voters approved a series of capital improvement bonds initiatives put forward by the Forward Thrust Committee, that included funding for a multipurpose stadium (Kingdome), historic preservation, arterial highways, neighborhood improvements, and parks and recreation, among others. In 1971, the Washington legislature created the Washington Heritage Register, and in 1973, the city passed a Landmarks Preservation Ordinance, establishing the Seattle Landmark designation (Williams and Miller 2015). In 1973, the City passed an ordinance that established the International Special Review District (ISRD) and ISRD Board, to "promote, preserve, and perpetuate the cultural, economic, historical, and otherwise beneficial qualities of the area" (Seattle Department of Neighborhoods 2023). The Seattle Chinatown-International Historic District, which is located within the ISRD, was listed in the NRHP in 1986 (Kreisman 1986).

In the 1970s, Seattle saw a drop in the city's population after a series of layoffs at the Boeing plant. Due to an influx of successful companies like Microsoft, Starbucks, and Costco, and research institutions at the UW, neighborhoods began to see rising populations and a corresponding growth in construction of new housing units, including mixed-use buildings along arterials but mostly single-family dwellings along residential streets (Williams and Miller 2015). In 1980, the City Council approved Ordinance 109560, which compiled and codified City ordinances that were passed on or prior to November 19, 1979, into the Official Code of The City of Seattle (Seattle City Clerk 2023). In 1984, Seattle's City Council passed an ordinance (111571) to pay reparations to five Japanese American city employees who were "terminated,

laid off, or dismissed" due to President Roosevelt's executive order 9066 during World War II (Long 2001).

By the late 1990s, the rise in high-technology and knowledge sectors brought an influx of diverse, talented workers from around the world. The city by 2010 had just over 600,000 residents and by 2020, Seattle's population had soared to 735,015 (U.S. Census Bureau 2022).

Although Seattle began as a sparsely populated region whose settlers supported nearby lumber mills, by the turn of the twentieth century, it had become the Pacific Northwest's powerhouse city with considerable commercial, transportation, industrial, and maritime industries. Seattle's Chinatown-International District is a racially diverse cultural center for Chinese Americans, Japanese Americans, and Filipino Americans, as well as others. Today the city is home to modern hi-tech, retail, commercial, and multi-family infill construction in villages. While some single-family homes and small commercial ventures make way for denser urban infill, most of the city's acres are still in low density residential use.

Development in Seattle Neighborhoods

Area 1: NW Seattle

Around 1870, David Denny purchased 160 acres in the area now known as the Licton Springs neighborhood and built a summer home there. The area was, and continues to be, an important cultural location for the Duwamish, Muckleshoot, Snoqualmie, Suquamish, Tulalip, and other Puget Sound region Tribes, and was known as líq'təd. The area contained forests, bogs, marshes, and mineral springs. The spring water contained minerals that colored the mud a coppery red. The Tribes used the red-colored mud in ceremonies and for other traditional purposes and harvested the native plants throughout the area (Remle and Howard 2019; Simpson 2021).

After the area along the shore north of Lake Union was logged around 1881, non-Indigenous people began settling there. In 1882, William Ashworth built a small cabin for his family on land he purchased from Corliss P. Stone at the northern end of Lake Union, in the area of present-day Wallingford. Also in the early 1880s, John and Mary Jane Ross moved north across the Outlet, which is what non-Indigenous settlers called the small stream that drained Lake Union into Salmon Bay, to the area now known as Ross/Fremont, where a few other settlers lived, including William and Mary Crawford. The settlers farmed and built a school for their children (Krafft 2010a; Veith 2005).

In 1883, the Lake Washington Improvement Company hired the Wa Chong Company to excavate canals connecting Salmon Bay and the Puget Sound with Lake Washington (see below Downtown/Lake Union [Area 4], for more information about the Wa Chong Company). The Wa Chong Company completed the canals in 1886, allowing for passage of shallow-draft boats and log booms through the Fremont and Montlake Cuts. That same year, David T. Denny and Judge

John P. Hoyt platted the Denny & Hoyt's Addition, which encompassed land on both sides of the Outlet (Krafft 2010a; Riddle 2014; Veith 2005).

By the late 1880s, much of the present-day neighborhoods of Northlake, Edgewater, Fremont, and Wallingford had been logged over, and the Seattle Lake Shore and Eastern Railroad (SLS&E) connected the area with Seattle. By 1890, real estate investors had platted a number of subdivisions and sold lots for residential development, lumber and shingle milling companies set up operations, the Seattle Electric Railway and Power Company had established an electric trolley service, and a fleet of steamers plied the waters of Lake Union transporting passengers and supplies (Krafft 2010a).

The present-day neighborhood of Ballard developed on the Utter lands in the early 1880s, after real estate investors from Seattle purchased the property. By 1887, the West Coast Improvement Company combined a series of neighboring tracts with the Utter property and platted the unit as Gilman Park. Most of the parcels were designated residential and commercial, but larger plots along the waterfront were allocated for industrial uses, which attracted shingle and lumber mills (Walton Potter 1976).

After the Great Fire of 1889 leveled much of downtown Seattle, investors and entrepreneurs established additional industrial, commercial, and retail operations in the burgeoning community of Fremont, including an iron works, a tannery and machine works, a hotel, hardware store, grocery, dairy, cigar stores, cafes, fraternal organizations, and a meat market. A number of residences and churches were also built during this prosperous time (Krafft 2010a).

It was in the late 1880s that a real estate developer platted 600 acres around Green Lake, built an amusement park on the northwestern shore of the lake, and worked to extend a railway line to the lake. At around the same time, a developer named Guy Phinney platted the Woodlands Estate subdivision in what became the Woodland Park neighborhood, built the Woodlands Hotel, and installed his own streetcar line to connect with Fremont (Studio TJP 2021; Veith 2005).

As growth continued and the area thrived, Ballard incorporated in 1890, while Seattle annexed Fremont, Green Lake, and much of North Seattle in 1891. Soon after annexation, Seattle established an elementary school in Fremont. In 1899, Seattle purchased and annexed the Phinney property. Shortly after the turn of the twentieth century, Fremont's street railways expanded north to Greenwood and later to Green Lake, Ballard, and east to Meridian and Wallingford, spurring residential growth with accompanying small commercial and retail centers (Krafft 2010a; Veith 2005; Walton Potter 1976).

In Ballard, by 1904 there were 15 shingle mills, iron foundries, shipyards for the fishing fleet, drop forge works, wood pipe works, and boiler works, and its population was around 10,000. Much of the residential stock constructed in Ballard during this time was worker housing around the industrial areas. That same year, Ballard received a Carnegie Library, which was listed in the NRHP in 1979 (Morrison Beals 1979; Walton Potter 1976).

In 1905, farther to the north, Theodore N. Haller purchased the land John Welch homesteaded, in what became known as the Haller Lake neighborhood. Haller then platted tracts around the lake for sale. The area, along with the neighboring community of Bitter Lake, slowly developed with a sparse population of small farms and summer cabins (Fiset 2001b).

In 1906, the Seattle Gas Light Company opened its gas manufacturing plant, originally called Lake Station, on the headland that protrudes south into Lake Union. Over the years, the plant delivered gas to Seattle, Renton, Kent, and Tukwila through 1,071 miles of pipes; the plant closed in 1956. In 1962, the site was purchased by the City of Seattle, and between 1969 and 1978, Gas Works Park, designed by Richard Haag, was developed. The park was listed in the NRHP in 2012. Also in 1906, the Seattle–Everett Interurban line was installed through Fremont, and reached Haller Lake by 1910, which contributed to another surge in population and residential housing growth. Likely hoping to see their faltering water and sewer systems upgraded, Ballard's citizens approved annexation to Seattle in 1907. In 1910, a Carnegie Library was constructed in Green Lake, which was listed in the NRHP in 1981 (Krafft 2010a; Tusa Fels and Edstrom O'Hara 2012; Vandermeer 1981a; Walton Potter 1976).

In the early 1910s, as planning was underway for the construction of the Chittenden Locks and Lake Washington Ship Canal to connect Lake Washington with Puget Sound, Seattle engineers also planned for a new bridge to cross the channel at Fremont Avenue. Completed in 1917, the Fremont Bridge, a double-leaf trunnion bascule bridge, was listed in the NRHP in 1982. The Hiram M. Chittenden Locks and Related Features of the Lake Washington Ship Canal, also completed in 1917, were listed in the NRHP in 1978 (Soderberg 1980; Walton Potter 1977).

Although discrimination limited job opportunities for people of color, in the mid- to late 1910s, the Ballard shingle mills employed some African Americans, who were recruited by James A. Roston. A former Army officer, Roston helped other Black and sometimes Filipino Seattle residents find employment in mills, as cooks for the Admiral Lines, and in other industries (Mumford 1985:30–32).

In 1919, the Lakeside Boys School opened in Haller Lake, and two years later, the area's residents established a community club. Clare E. Huntoon, who purchased 200 acres of land in the Haller Lake area, never platted her land. After her death, developers acquired the land and built commercial, educational, and cultural properties, such as the Playland amusement park at Bitter Lake (built in 1930 and demolished in 1961), Ingraham High School (built in 1959 and designated an SL in 2016), and the Jewish cemetery, Bikur Cholim Cemetery (built in 1890) on N 115th Street. The Bikur Cholim is King County's oldest Sephardic cemetery (Bikur Cholim Machzikay Hadath [BCMH] 2023; Fiset 2001b; Sundberg 2010; The Johnson Partnership [TJP] 2016).

Some first-generation Japanese immigrants—Issei—settled on farms around Green Lake. Many farmed fruit, berries, flowers, and vegetables, which they sold to wholesalers or transported for sale at Pike Place Market. Other Japanese residents operated small commercial or retail enterprises. By the mid-1930s, there were about 300 Issei living in the area. In 1942, all the Japanese residents on the West Coast were forcibly removed and incarcerated for the duration

of World War II by President Roosevelt's executive order 9066. After the war, many never returned to the area, and over time, their former farmlands were developed (Studio TJP 2021).

Throughout the 1920s and up until the onset of the Great Depression, residential development in the NW Seattle area remained strong. Most residential buildings (single family homes, duplexes, and apartments) were constructed near commercial districts and expanded outward from there, usually following streetcar lines. In the NW Seattle area, racially restrictive covenants were found in a number of residential developments. One example of such covenants was found in the Overland Park subdivision. Built by the Peoples Realty Company, the covenants covered about 990 properties. The covenant restricted the renting, leasing, or selling of the lots or buildings to African Americans or Asian Americans (UW 2020).

In 1921, a Carnegie Library was built in Fremont; the property was listed in the NRHP in 1981 (Vandermeer 1981b). Like many areas of Seattle, the depression slowed real estate development through the end of World War II, when returning soldiers caused a residential and commercial construction boom, and a transformation to an automobile driven urban form in NW Seattle (Krafft 2010a).

The 1950s saw many changes in industrial and economic activity. In 1954, the city annexed the northern end of NW Seattle out to N 145th Street, which brought improvements in infrastructure and new residential development. During this time, many lumber mills declined and closed, and industrial development shifted south of Seattle in King County, which caused commercial and waterfront areas to deteriorate in NW Seattle. In preparation for the construction of Interstate 5, WSDOT purchased and demolished numerous buildings along the proposed two-block wide route through NW and NE Seattle. (Dorpat 2001a; Fiset 2001b; Tobin and Sodt 2002; Veith 2005; Wilma 2001d).

In the 1960s, the City purchased the Licton Springs property for a city park and filled in the bathing area. Improvements in the 1970s and 1980s included the creation of a pond, construction of a comfort station, and installation of stone or concrete ring around the iron oxide spring. The area continues to be a significant Tribal sacred place for gathering, healing, and ceremony, and was designated a SL in 2019 (Remle and Howard 2019; Simpson 2021).

After many years of decline, the 1970s and 1980s brought an influx of art, social services, and community development to Fremont and Ballard, causing a resurgence of the area. During this time of change, the Seattle School District's desegregation program bussed African American students to Lincoln High School. In response to desegregation, some parents pulled their students out of integrated public schools, and Lincoln closed in 1981 due to declining enrollment. After sitting unused for nearly 40 years, the school reopened in 2019. It currently serves approximately 1,700 students. In 1976, Seattle purchased the 11-acre site of the House of the Good Shepherd and transferred the deed to Historic Seattle. The property now includes the Meridian Playground, and the building is used as a multi-purpose community center. The Good Shepherd property was listed in the NRHP in 1977 and designated a Seattle Landmark in 1981. Throughout the 1980s, new residential and mixed-use development increased in the area

(Alexander and Layman 1977; Krafft 2010a; Office of Urban Conservation 1981; Seattle Public Schools 2023; Veith 2005).

Area 2: NE Seattle

Development of the NE Seattle area closely followed the development in the NW Seattle area. In 1867, Christian and Harriet Brownfield, the earliest known non-Indigenous settlers in the NE Seattle area, filed a land claim for 174 acres, receiving their land patent in 1873. Northeast of the Brownfields claim, in the present-day Laurelhurst neighborhood, William H. Surber, Henry Nathan Jr., John Hildebrand, James and Alex Elder, Terresa Feltofer, and many others filed claims. The Brownfields and their neighbors farmed and improved their land (Rochester 2001a; Tobin and Sodt 2002). Farther to the north, in what is now the Lake City area, agricultural and residential development remained slow, with lumber mills and logging operations along the shoreline (Wilma 2001d).

Two events would open the area for settlement and development. By 1887, the SLS&E reached Union Bay and Laurelhurst, creating easier access to the area. And, in 1888, Henry Yesler purchased some of William Surber's land, established a sawmill near what is now Union Bay Boglands, and logged the surrounding area. With railroad access and cleared land, small farms and orchards developed. In 1889, William W. and Louise Beck platted tracts in the present-day Ravenna neighborhood, and James A. Moore platted tracts in what is now the Latona neighborhood. In 1891, the City of Seattle annexed the Brooklyn neighborhood (Tobin and Sodt 2002).

The biggest boon to the NE Seattle area was the relocation of the UW campus from downtown to Brooklyn in 1895. With a student enrollment of over 600 students by 1900, the UW drove development in the area. Between 1900 and 1910, all the tracts north of campus were platted and subdivided (Tobin and Sodt 2002). A number of buildings and structures on the UW campus are listed in the WHR, including Denny Hall, Parrington Hall, Bagley Hall, and Lewis Hall, all of which were listed in 1971, while the UW Faculty Center was listed in the NRHP in 2009 (DAHP 2023)

In 1900, the Seattle Golf and Country Club purchased 40 acres in Laurelhurst and luxury real estate development soon followed, with the largest waterfront lots set aside for public-use maritime facilities, such as boat launches, to attract buyers (Rochester 2001a). In 1902, the University Heights School was completed, and a wing was added in 1907. The school was listed in the NRHP in 2010 (Lengyel 2010).

In 1906, after receiving approval and funding from the Washington state legislature on their proposal for Seattle to host a world's fair in 1909, the Board of Trustees for the Alaska–Yukon–Pacific Exposition reached out to the Olmsted Brothers. They requested the firm develop landscaping plans for the fair's 250-acre grounds on the UW campus (Beckner and Perrin 2016; Williams 1999). At the exposition the buildings represented industries, states and countries, including Washington, Oregon, Alaska, Hawaii, and New York, the Philippines, Japan, and Europe, among many others, and were arranged around a central fountain and landscaped area

with views to Mount Rainier. Contemporaneous fair maps show two locations featuring the Philippines: the Philippine Building and the "Igorrote" (Igorot) Village (Cordova, et al. 2009). Located in the fair's so-called entertainment area, the village, which featured members of the Bontoc Igorot, from Northern Luzon's Cordillera mountain provinces, contained traditional huts and fenced enclosures (Cordova, et al. 2009). Also located in the entertainment section of the fair, were both a Japanese Village and a Chinese Village. The manager of the Chinese Village was a Seattle merchant, Ah King. The village pavilion showcased Chinese shops, a temple, restaurant, and a performance stage (Ho and Bronson 2023). After the fair ended, UW used many of the former buildings and structures for classrooms and other campus uses. Over time most were removed. Today only Drumheller Fountain (originally Geyser Basin), Rainier Vista, remnants of the Olmsted landscape, the curving W and E Stevens Way NE (originally Pacific Avenue), Architecture Hall (originally the Fine Arts Building), and Cunningham Hall/Alene Moris Women's Center (the Woman's Building), which was relocated to George Washington Lane NE in 2009 (Andrews 1998; Frykman 1962; Sanborn Map Company 1909; UW 2023).

By 1910, most of the residential area around the UW had been platted and the area had a thriving commercial district, influenced by the Alaska–Yukon–Pacific Exposition. Many who came to Seattle for the fair stayed to purchase homes and establish businesses. In 1910, the Brooklyn area was annexed by the City of Seattle (Dorpat 2001a;Rochester 2001a; Tobin and Sodt 2002).

In 1920, in an industrial area on the Sand Point peninsula, King County, through purchase and condemnation, obtained slightly more than 400 acres to establish an airfield. In 1926, the U.S. Navy accepted the deed and began building the Naval Air Station Seattle. The station was decommissioned in 1970, and the base is now used as a Naval air reserve station, Magnuson Park, and a National Oceanic and Atmospheric Administration (NOAA) site. Naval Air Station Seattle was listed in the NRHP in 2010 (Howard et al. 2009).

In the 1920s and 1930s, in the NE Seattle area, racially restrictive covenants were found in a number of residential developments. One example of such covenants was found in the Maple Leaf Addition to Green Lake Circle subdivision. Built by A. F. Nichols Company, the covenants covered about 720 properties. The covenant restricted the renting, leasing, or selling of the tracts or buildings to anyone "other than one of the white race" (UW 2020).

The 1950s saw shifts in development. At the northern end of the NE Seattle area, in 1950, the Northgate Mall opened. The property was the first shopping mall in the United States. The construction of the mall hastened declines in the area's small neighborhood commercial corridors. Also, in preparation for the construction of I-5, WSDOT purchased and demolished numerous buildings along the proposed two-block wide route through NE and NW Seattle. In 1953, Seattle Children's Orthopedic Hospital opened its new campus in the Laurelhurst neighborhood. In 1954, the area that includes Haller Lake neighborhood and the Lake City community were annexed by the City of Seattle (Andrews 1999; Dorpat 2001a; Fiset 2001b; Tobin and Sodt 2002; Veith 2005; Wilma 2001d).

The post-World War II period saw a boom in the student population at UW, with returning service members taking advantage of the G.I. Bill to enroll in college. During this time, the UW expanded its campus to the south and southwest. But it was the construction of I-5 that caused a massive shift in the area. The freeway divided the University District from its historic western neighbors, the Latona and Wallingford neighborhoods (Dorpat 2001a; Tobin and Sodt 2002).

By the 1960s, Children's Orthopedic Hospital had expanded as a teaching hospital. The UW Medical School pediatrics program was located in the hospital. In 1970, the hospital opened the Odessa Brown Children's Clinic in the Central District (Andrews 1999).

After years of decline, the 1970s and 1980s brought an influx of art, social services, and community development to NE Seattle. The post-war baby boom, urban flight, desegregation, and the Boeing Bust moved residents out of the city into the suburbs, where development had slowed. As development picked up, smaller, older buildings were demolished and replaced. During this time, UW continued to have high enrollment and increased its student body in the 1970s (Dorpat 2001a; Meisner and Krafft 2015; Tobin and Sodt 2002).

In 1997, the Children's Orthopedic Hospital became Children's Hospital and Regional Medical Center, was allied with a number of regional hospitals and clinics, and had expanded clinics in Bellevue, Federal Way, and Olympia (Andrews 1999).

Area 3: Queen Anne/Magnolia

Residential development on lower Queen Anne Hill began in the 1870s and boomed in the 1880s, as the early non-Indigenous settlers subdivided and sold off portions of their land holdings. Infrastructure such as private water systems and electrical power service were available in Queen Anne in the 1880s, as well as some public transportation, such as cable cars, a ferry on Lake Union, and horse-drawn trolleys. The southern portion of Queen Anne was annexed by the City in 1883 (Lentz and Sheridan 2005).

While the Queen Anne neighborhood grew rapidly due to its proximity to central Seattle, growth in Magnolia was due to the construction of the West Point Lighthouse and later, Fort Lawton. Built in 1881, the lighthouse was originally a manned station, with two lighthouse keepers' houses built just east of the lighthouse structure. The lighthouse was remote and accessible only by water until 1883 when a horse trail was built connecting it to a wagon road. In 1985, the lighthouse was automated, and in 2002, the Federal government declared it surplus. The City obtained the deed to the property, restored the structure, and incorporated the property into Discovery Park. The West Point Lighthouse was listed in the NRHP in 1977 and is a resource within the Maritime Washington National Heritage Area (MW NHA) (Anderson 2023; Williamson 1977).

Fort Lawton was established in 1898 at the westernmost tip of Magnolia Bluff. Originally, it was part of a 700-acre land donation by local landowners. As one of a series of coastal military forts, Fort Lawton was an infantry headquarters and a strategic defense for the Puget Sound Naval Shipyard at Bremerton and the Port of Seattle. Around 1901, African American soldiers were

garrisoned at Fort Lawton and helped to fight fires in national parks and forests, although some locals complained to the War Department about the presence of these troops. Army Sergeant Frank Jenkins, with his wife Rufina Clemente Jenkins, were stationed at Fort Lawton in 1909. They were the first Filipino family to homestead in Seattle. Over time, the Fort was used for National Guard training, troop processing and embarkation to the Pacific and Far East combat zones during World War II, and a German prisoner of war camp. In 1972, ownership of 391 acres of land around the fort was transferred to the City and became Discovery Park, which is now home to a visitor's center, playground, hiking trails, beach access, the West Point Lighthouse (1881), and the Daybreak Star Indian Cultural Center (1977). In 2007, additional portions of the Fort property were turned over to the City. The Fort was listed in the NRHP and designated a Seattle Landmark (Boyle and Sokol Fürész 2007; Cordova 2009; Kavanaugh 1978; Mumford 1985; Williamson 1977).

Between the 1890s and early twentieth century, the Queen Anne neighborhood blossomed. Residential infill construction followed extensive logging on the south side and the top of Queen Anne Hill. Other improvements during this time included the construction of the West Queen Anne Elementary School (listed in the NRHP in 1975), installation of a municipal sewer system, a municipal water service, the construction of the Great Northern Railway's terminal at Smith's Cove, and the addition of streetcar and trolley lines. In 1907, Charles R. Collins built the Chelsea Family Hotel on the hill across from Kinnear Park. Listed in the NRHP in 1978, the Chelsea Family Hotel is a significant example of an early twentieth century apartment house (Walton Potter 1975a; Sutermeister 1978).

Most residential growth in Magnolia occurred after 1900. In those early years, some scattered residential and commercial developments appeared in the vicinity of the Fort, butut in 1905, the neighborhood began to see additional development after a streetcar line was constructed to the area. Residences, small farms, dairies, and orchards grew up along the line. Two years later, the Magnolia area was annexed to the City (Boyle and Sheridan 2015).

The completion of the Port of Seattle in 1911 and the Chittenden/Ballard Locks and Lake Washington Ship Canal in 1917 cemented the industrial, manufacturing, and maritime use of the area in and around Interbay, Lake Union, and Salmon Bay (Boyle and Sheridan 2015; Lentz and Sheridan 2005).

By the 1920s and 1930s, the Magnolia/Queen Anne area began to see further commercial development with additional small commercial districts built at the southern end of Magnolia and residences constructed on its ridges to the east and south. In 1927, the Magnolia School was built (Boyle and Sheridan 2015). In the Queen Anne/Magnolia area, racially restrictive covenants were found in a number of residential developments. One example of such covenants was found in the 832 property deeds of the Carleton Park subdivision, which was a residential development built by Charles F. Clise in 1928. The covenant restricted the renting, leasing, or selling of the tracts or buildings to anyone of the Asian American or African American "lineage" (UW 2020).

In 1940, the build-up to World War II increased jobs and the need for housing in Magnolia, and changes in public transportation brought a bus system to the neighborhoods transitioning

away from street cars. The U.S. Navy takeover of much of Interbay brought the biggest changes to the Queen Anne/Magnolia area. The Navy filled in the tidal flats and constructed a supply depot, warehouses, barracks, and other buildings in Interbay, creating jobs and housing units, as the port sent thousands of troops to the war in the Pacific theater (Boyle and Sheridan 2015; Williams and Miller 2015). Like most parts of the city, at the end of the war, both Magnolia and Queen Anne neighborhoods saw a corresponding housing boom, with Magnolia seeing new neighborhoods develop around Fort Lawton (Boyle and Sheridan 2015; Wilma 2001b).

The Century 21 Exposition, the World's Fair of 1962, brought almost ten million attendees, and left an indelible mark on the Queen Anne neighborhood. A number of innovative, significant buildings and structures were designed for the Expo, including the Science Pavilion, Monorail, Space Needle, and the Century 21 Coliseum. The Science Pavilion was designed by Minoru Yamasaki and is today the Pacific Science Center, which was designated an SL in 2010 (Peterson 2010). The Monorail was designed by Germany's Alweg Company and was designated an SL in 2003 (Boyle 2003). The Space Needle was designed by John Graham, Jr., Victor Steinbrueck, and John Ridley and designated an SL in 1999 (Boyle 1998). The Century 21 Coliseum (designed by Paul Thiry) transitioned to a civic and multi-purpose convention and sports center and has remained an important architectural resource for Seattle. The building, now known as Climate Pledge Arena, was renovated in 1995 and listed in the NRHP in 2017 (Lazzaretto et al. 2017; Stein 2000).

Prior to the mid-1960s, Seattle's neighborhoods, commercial, and industrial enterprises discharged raw effluent into Puget Sound. In 1966, the City built the West Point Treatment Plant just east-northeast of the West Point Lighthouse. Secondary treatment tanks were installed in 1995. The plant was a necessary upgrade in infrastructure and now treats approximately 90 million gallons of wastewater per day from Seattle, Shoreline, north Lake Washington, north King County, and south Snohomish County (King County 2023; Long 2018; Wilma 2000).

In the 1970s, additional neighborhood amenities were built in the Queen Anne neighborhood. In 1972, the Queen Anne Recreation Center playfield was redeveloped, and in 1978, the City built the Queen Anne Pool. The pool was designed by Benjamin McAdoo Jr., the first African American to own an architecture firm in Seattle and the first to operate a long-term architectural practice in the state (Williams and Miller 2015).

Area 4: Downtown/Lake Union

The Denny Party, who arrived in 1852, were the first non-Indigenous settlers who landed in the area that would become Pioneer Square. The party included Arthur A. Denny and his brother David T., John N. Low, Carson D. Boren, William N. Bell, Charles C. Terry and his brother Lee, and their families. Later that year, Henry L. Yesler and David S. Maynard joined them. Yesler set up his steam-powered sawmill at the foot of what is now Yesler Way (Crowley and McRoberts 1999; Denny 1888:7–13, 16–17; Fiset 2001a).

In the hopes that the Northern Pacific Railway (NP) would choose to terminate its transcontinental line in Seattle, the inhabitants set about clearing trees, filling tidal marshes, constructing wood-frame residential and commercial buildings, blockhouses, and a wharf at the harbor. In 1861, Seattle lost the campaign to become Washington Territory's new capitol but won the right to build the Territorial University in Seattle. In the early 1860s, Bell, after returning from a sojourn in California, platted his claim into town lots. Shortly after Seattle was incorporated in 1869, the 1870 Census counted around 1,000 residents. In 1874, to the disappointment of the town, NP chose Tacoma over Seattle for its terminus (Bagley 1916; Crowley 2006; Williams 2015).

In 1868, Chun Ching Hock, who was likely Seattle's first Chinese immigrant, and his business partner, Chun Wa, opened the Wa Chong Company near the Yesler Mill. The company operated a general merchandise store and contracted Chinese laborers for jobs in Seattle and for the railroads. By the mid-1870s, around 250 Chinese settlers lived in the "Chinese quarter" or Chinatown (Kreisman 1986; Riddle 2014).

By 1878, Seattle's population had grown to about 3,000 inhabitants (Williams 2015). By the 1880s, development had spread east to the south end of Lake Union, where entrepreneurs established industries there such as sawmills, brick manufacturing, shipbuilding, tanneries, and iron works (Tusa Fels and Edstrom O'Hara 2012).

During the 1880s, two of Seattle's main industries were logging and the transportation of coal. Around Lake Union, a number of sawmills opened along its shores to process the timber harvested around the lake and a number of piers for offloading of coal (Link 2004). By 1884, the horse-drawn cars of Frank Osgood's Seattle Street Railway were operating in the downtown area. Osgood extended his line to the southern shore of Lake Union and built a wharf there for steamships ferrying passengers and supplies (Veith 2005). That same year, David Denny donated land for the first public park within the city. Although originally a cemetery, in 1884, the remains were disinterred and reinterred in Lakeview Cemetery (formerly the Washelli Cemetery), and the land became a park (Beckner and Perrin 2016; Corley 1969a).

In the 1880s, many Chinese worked in downtown Seattle. Although they faced discrimination and abuse from many in Seattle, Chinese laborers built streets and railroads, operated downtown businesses, worked in mills and the fishing industry, and were domestic workers. Following the passage of the Federal Chinese Exclusion Act in 1882, anti-Chinese sentiment continued to rise against the area's remaining Chinese inhabitants as other laborers perceived greater competition for jobs. Four years after the law passed, an angry crowd of Seattle residents swarmed into Chinatown and forced many Chinese to leave the city. Those who stayed and those who arrived later, relocated to a regraded area east of the railroad tracks, creating a new Chinatown. The Chinese established shops, businesses, social organizations, schools, hotels, and apartments there. The Chinese Exclusion Act was finally repealed in 1943. The Chinatown-International District was listed in the NRHP in 1986 (Kreisman 1986; NARA 2023; Riddle 2014).

The Japanese community also worked in Seattle's downtown. Kyuhachi Nishii was the first known Japanese resident in Seattle. After arriving in town from Oregon in 1888, he opened the Star Restaurant with his business partner, Azuma. Many other Japanese settlers worked in sawmills, canneries, shops, and on the railroads, while others took jobs as domestic help. The Japanese quarter known as Nihonmachi ("Japanese town") grew just north of Chinatown (Link 2007; Takami 1998).

The SLS&E was incorporated by a group of 13 investors comprising Thomas Burke, Daniel Gilman, James R. McDonald, T. T. Minor, John Leary, Henry L. Yesler, David T. Denny, George Kinnear, G. Morris Haller, Griffith Davies, William Cochrane, James W. Currie, and Frank Osgood. Construction began in 1887 at the depot near the waterfront with a line that ran northwest along Elliott Bay to Interbay, then north to Ballard, east to Lake Union, Ross and Fremont, Wallingford, Brooklyn (now the University District), to Union Bay, then on to Yesler, and finally to Bothell by November that same year. By 1888, the eastern branch line reached into Snohomish County and finally to the coal mines of Gilman (now Issaquah), and the northern branch extended to Arlington. In 1901, the SLS&E was acquired by the NP and became its Seattle Division (Veith 2005).

Like many cities in the late nineteenth century, Seattle was susceptible to fire. Seattle's commercial core was nearly leveled by the "Great Seattle Fire" in 1889, which destroyed 64 acres of commercial, industrial, and residential buildings and the city's wharves, piers, depots, mills, and warehouses. The fire initiated a rebuilding effort that resulted in new stone and brick buildings, the widening and regrading of streets, and a phase of infrastructure improvements such as a public water system and cable car lines across the city to the suburbs (Caldbick 2020a, 2020b; Crowley 2006; Schultze et al. 2017). By 1891, a birds-eye image of Seattle, prepared by Augustus Koch, showed development spreading from the waterfront east to the banks of Lake Washington, which were still mostly forested but beginning to fill with scattered development in the clearings (Koch 1891). By 1893, the Great Northern Railway's transcontinental line terminated in Seattle, creating more opportunities for growth and development (Crowley 2006).

In 1895, the UW campus relocated from downtown to the Brooklyn neighborhood. The city also undertook a series of regrades, beginning in 1898, to flatten Denny Hill and others north of downtown. The regrades created easy access to the Belltown, Queen Anne, and Lake Union neighborhoods (Sheridan 2007). Much of the dirt removed in the regrades was used to fill in wetlands and tidal flats, as well as the depression known as the Belltown Ravine (Link 2004:8; Thomas Street History Services [TSHS] 2006; Tobin and Sodt 2002; Williams 2015).

After the turn of the twentieth century, the City of Seattle embraced the progressive era with a series of planned projects, including annexing a series of suburban towns, hiring the famed Olmsted Brothers landscape architects to create plans for parks, scenic boulevards, and playgrounds, built utilities and schools in the outlying neighborhoods, and began paving roads. (Crowley 2006). As a part of this progressive mindset, the City Council gave James J. Hill reclaimed tidal flats for construction of the Great Northern depot. City engineer Reginald H.

Thomson objected to Hill's plans and insisted on a tunnel under the business district to reduce congestion. After the tunnel was complete in 1904, Great Northern built the King Street Station, which was finished in 1906 and was listed in the NRHP in 1969 (Corley 1969b; McClary 2002; TSHS 2006). It was city engineer Thomson who designed the east–west alignment for piers built in the 1900s along the waterfront (TSHS 2006).

Additionally, the City founded the Pike Place Public Market in 1907 (City Ordinance 16636). Located on Seattle's waterfront, the market was developed in response to widespread price gouging by wholesalers who raised the costs to consumers while minimizing payments to farmers. The market was an instant success. Shortly after the market opened, neighboring businessman Frank Goodwin constructed a large two-story building to house market stalls out of the weather. By 1909, the market was attracting over 60 farmers a day to sell their products, and each month the market drew 300,000 visitors and stimulated additional commercial development in the downtown area (City of Seattle 2022; PikePlaceMarket.org 2021). Developed as a unique public-private partnership, the Pike Place Public Market was listed in the NRHP in 2010 (Krafft 2010b).

Just prior to this booming time, the Philippines came under colonial control of the United States following the Spanish-American War of 1898. After a three-year battle, the devastating Philippine-American War ended in 1902, and many Filipinos migrated to the United States, with some coming to Seattle. Many Filipinos, who could not become citizens or own property at the time, worked installing telegraph and telephone lines and attended college (Chinn 2011; Cordova 2009; Hedden 2013).

In 1909, when the city hosted the world's fair, the Alaska–Yukon–Pacific Exposition, Seattle surpassed expectations and impressed visitors as a major port city. In preparation for the influx of visitors to the Expo, the Seattle Park Board updated the 1890s-era Pioneer Square Park with a Chief Seattle fountain, a pergola, and a comfort station. The Pioneer Square-Skid Road National Historic District and the Pioneer Building, Pergola, and Totem Pole were listed in the NRHP in 2007 and 1977, respectively (Crowley 2006; Link 2007; Pitts 1977).

The city's commercial core shifted north of pioneer Square by 1910, as industries moved south (Crowley 2006). As rents increased for Chinese Americans, they moved farther east. One such move was the Wa Chong Company, which moved operations into the East Kong Yick Building in 1910 and would remain in business there until 1953. The building reopened in 2008 as the Wing Luke Museum of the Asian Pacific American Experience (Riddle 2014).

The construction of the Chittenden Locks and Lake Washington Ship Canal in 1917 triggered an expansion of Lake Union's boat yards. Some of the boat yards repaired ocean sailing ships, as they could now enter the canal to access Lake Union, while other shipbuilders built a fleet of wooden boats for World War I. The fleet never joined the war effort (Becker 2007).

Beginning in the 1920s, automobile-related enterprises, warehouses, light manufacturing plants, and construction-related businesses were constructed in South Lake Union (Krafft and Meisner 2014). The regrades of the Downtown/Lake Union area continued into the 1920s and

1930s, including the area of Denny Park. The project lowered the park grade by over 60 feet, and it was landscaped with walkways on the diagonal and cardinal directions, and planted with lawn, shrubs, flowers, and trees. Denny Park was listed in the NRHP in 1969 (Corley 1969a).

While most of the Chinese, Filipino, and Japanese immigrants to Seattle lived in the Chinatown area and Nihonmachi, by the 1920s and 1930s, some had moved farther out from the downtown area into the Central District onto larger properties where they grew fruits and vegetables to sell at Pike Place Market (Riddle 2014; Tobin 2004a). During the Great Depression, commercial construction in the downtown area slowed and commercial enterprises in the Pioneer Square area declined, but some industries rebounded during World War II in support of the war effort (Crowley and McRoberts 1999).

In 1940, construction began on the Naval Reserve Armory at the south end of Lake Union. The building and others at the site were completed in mid-1942 and was used to train thousands of U.S. Navy sailors, range finders, ammunition handlers, welders, electrician's mates, and others. The site was decommissioned after the war and some of the buildings removed. In 1991, the property was redeveloped as Lake Union Park and maritime heritage center. The Naval Reserve Armory was listed in the NRHP in 2009 (Sokol Fürész and Boyle 2009)

During World War II, the residents of Japanese ancestry who lived in the Nihonmachi, were forcibly removed and incarcerated for the duration of the war. After the war ended, many Japanese residents never returned to the area, and many lost their businesses and homes (Kreisman 1978; Studio TJP 2021; Tobin 2004a).

Also in the 1940s, in the Downtown/Lake Union area, racially restrictive covenants were found in some residential developments. One example of such covenants was found in the Haggardts Addition subdivision. Built by Oren H. and Agnes M. Haggardt in 1946, the covenants covered about eight properties. The covenant restricted the renting, leasing, or selling of the tracts or buildings to anyone "other than one of the white or Caucasian race" except as domestic servants (UW 2020).

The post-war years allowed for some commercial and industrial growth in Seattle and led to a series of construction projects in the downtown area. The automobile-related businesses in South Lake Union expanded, and in 1947, the city passed a new zoning ordinance that rezoned most of the Cascade neighborhood and South Lake Union area for light industrial, manufacturing, and commercial use only (Krafft and Meisner 2014). The Alaska Way Viaduct project was designed to move traffic off Seattle city streets and bypass the downtown area, thus alleviating congestion. The first section opened in 1953, with the final section opening the following year (Veith 2005). Also, during this time period, work began on I-5 through Washington in 1959. The freeway bisected many neighborhoods, disrupted traffic patterns and routes, and introduced visual and auditory impacts downtown. The I-5 project was completed in 1969 (Dougherty 2010). During the 1950s, as the Cascade and South Lake Union neighborhoods shifted increasingly to commercial development, numerous residential buildings were demolished, and the neighborhoods were greatly affected by the construction of I-5 (Becker 2007).

In 1969, Pike Place Market was set to be demolished and replaced by multi-story buildings and a parking garage as an Urban Renewal project. Citizens were outraged and put forth an initiative in 1971 to create a Pike Place Market historic district and a historical commission to protect it. The initiative passed, and today the Market is celebrated as an iconic Seattle and tourist destination (City of Seattle 2022; PikePlaceMarket.org 2021).

In 1974, the 12th Avenue Bridge (1912) that links the International District to Beacon Hill was renamed in honor of Dr. Jose P. Rizal. Dr. Rizal was a nineteenth century Filipino patriot, artist, historian, and writer who was executed by the Spanish for his anti-colonial efforts on behalf of all Filipinos. After a campaign begun in 1960 by Filipino American civil rights activists Tinidad Rojo and Vic Bacho, the bridge was renamed, and in 1981, the Dr. Jose P. Rizal Park in Beacon Hill was constructed in his honor (Hedden 2013).

In 1989, voters approved a land use plan, Citizens' Alternative Plan (CAP) (Initiative 31), which established height and density limits for new construction in the downtown area. In 2006, the City altered those regulations by rezoning the downtown area to allow for greater height and density limits (City of Seattle 2023d; Wilma and Crowley 2001). In the 1990s, the downtown area underwent a period of redevelopment with revitalized stores and theaters, and increased residential and cultural development, including the building of a museum and a symphony hall (Crowley and McRoberts 1999). By the end of the twentieth century, the downtown area was booming.

Area 5: Capitol Hill/Central District

In 1869, Harvey Pike platted Union City on the isthmus between Lake Washington and Lake Union (at the northern end of present-day Montlake), reserving a 20-foot-wide strip of land for a future connecting canal between the lakes. Two years later, Pike transferred the property to the Lake Washington Canal Company, which built a tram rail for portage between the lakes. In 1875, Charles Coppin dug a well in the First Hill area that had been logged by Henry Yesler. The well became a source of drinking water for the development that followed. Also in 1875, the first plat was filed in the Central Area for the Edes & Knight's Addition (Dorpat 2001b; Veith 2005, 2009).

One of the earliest African Americans to settle in Seattle was William Grose. Before moving to Seattle, Grose enlisted in the Navy, worked as a gold miner in California, aided the western branch of the Underground Railroad, and served as a community leader. While the date of his arrival in Seattle is unclear, Grose cooked in a number of downtown restaurants before opening his own restaurant in 1876, on Yesler Way near the wharf. In 1882, Grose purchased 12 acres of land from Henry Yesler in what is now the Madison Valley area of the Central District. The following year, he built a hotel and restaurant on Yesler Wharf that catered to working men, which also housed Grose and his family. After the Great Fire in 1889 destroyed his hotel, the Grose family moved to the Central District property. The Grose house still stands at 1733 24th Avenue (Long 2006; Mumford 1985; Raftery 2021; Veith 2009).

In the 1880s, likely triggered by Grose's land purchase and construction of his home, other African Americans moved into the Central District. This influx later spurred residential development that included the construction of apartment buildings for African Americans. One such apartment building was the one built by Zechariah and Irene Francis Woodson in 1908 (Mumford 1985). Between 1919 and 1923, African American businesspeople were operating a number of commercial enterprises in the Central Area (Mumford 1985; Raftery 2021; Veith 2009).

By the mid-1880s, Seattle's leaders, such as Colonel Granville and Henrietta Haller, Morgan and Emily Carkeek, and a number of the Dennys, moved to First Hill to escape the boomtown that they had helped to create. In First Hill, along 14th Avenue, they built expansive mansions (Dorpat 2001b). The Millionaire's Row Historic District was listed in the NRHP in 2020 (Kurlander 2020). Some row houses and duplexes were also built in the area during this time period (Dorpat 2001b).

Easily accessible transportation sparked growth in commercial, residential, and institutional development in the Central District. The first of three cable car lines was installed in 1888 to First Hill, with the others completed by 1891. A commercial strip grew along Madison Street, and residential tracts expanded east of Broadway into the Cherry Hill and Squire Park neighborhoods. In 1890, King County built its courthouse at the southern end of First Hill, and by 1891, the City built three schools, Rainier, Randell/Madrona, and T. T. Minor (Dorpat 2001b).

The first Jewish services for the Chevra Bikur Cholim temple were held in 1889, in the downtown Seattle area, before moving into a building in the Central District. The temple incorporated in 1891. In 1898, the congregation built a new temple at 13th Avenue and Washington Street. By 1909, the Jewish population outgrew the temple. In 1915, the Chevra Bikur Cholim Synagogue No. 3 was completed. In the early 1960s, the congregation moved to Seward Park, merged with Congregation Machzikay Hadath in 1971, and sold Synagogue No. 3 to the City of Seattle, which repurposed the building as the Langston Hughes Performing Arts Center, in honor of the renowned poet, social activist, and leader of the Harlem Renaissance. The Langston Hughes Cultural Arts Center was designated an SL in 1982 (BCMH 2023; Michelson 2023).

The Capitol Hill/Central District contains a number of parks that were discussed in the Olmsted Brothers' reports to the City of Seattle. One of these was Volunteer Park, which is often referred to as the "centerpiece" of the Olmsted Brothers' plan for Seattle (Walton Potter 1975b). Originally purchased by the City in 1876, the land that became Volunteer Park was used as a cemetery. In 1887, the remains were disinterred and moved to an adjacent parcel to the north, and the land became Lake View Park. By 1901, the park was renamed Volunteer Park and had a greenhouse, nursery, caretaker's cottage, walking paths, lawn, picnic areas, some play equipment, and a recently constructed in-ground reservoir. In their 1903 report to the City, the Olmsted Brothers, anticipating development around the park, recommended an observation tower from which to view distant important sights and a full design plan by the firm. Their plan for Volunteer Park

included a second reservoir, bandstand, music pavilion and pergola, and a conservatory, expansive lawns, undulating walkways, and various plantings. Construction began that same year (Beckner and Perrin 2016; Walton Potter 1975b). Volunteer Park was listed in the NRHP in 1975 (Walton Potter 1975b). In 1932, the Seattle Art Museum was constructed in Volunteer Park at the former location of the pavilion. The Art Moderne building was completed and opened in 1933. In 1994, the museum was renamed the Seattle Asian Art Museum, and in 2016, listed in the NRHP (Boyle 2016; Seattle Art Museum [SAM] 2023).

In the 1920s and 1930s, in the Capitol Hill/Central District area, racially restrictive covenants were found in a number of residential developments. One example of such racially restrictive covenants was found in 958 property deeds of the Capitol Hill subdivision, which was one of the largest subdivisions in the Capitol Hill/Central District (Area 5). Developed by the Capitol Hill Community Club in 1927 or 1928, this covenant was included in the deeds, restricting the sale, conveyance, lease, rent, or gift by the property owner or their "heirs and assigns," to anyone of African American heritage (UW 2020).

While most early Japanese immigrants originally settled in what is now known as the International District, in the 1920s and 1930s, many Japanese Americans moved out of the city into the Central District and Beacon Hill, as they found fewer racially restrictive covenants and more affordable housing. One of the most culturally important buildings in the community is the Japanese Language School at 1414 S Weller Street in the Atlantic neighborhood, just east of the Chinatown-International District. The school was established in 1902 and moved into its new building in 1913. The Japanese Language School (Nihon Go Gakko) was listed in the NRHP in 1982 (Dubrow 2002; Tobin 2004a).

In 1931, Harborview Hospital was built on the site of the former King County Courthouse, and a medical zone has been built up around it over time (Dorpat 2001b).

In 1959, work began on I-5 through Washington. The freeway bisected many neighborhoods, disrupted traffic patterns and routes, and introduced visual and auditory impacts downtown. The I-5 project was completed in 1969 (Dougherty 2010). During the 1950s, as the Cascade and South Lake Union neighborhoods shifted increasingly to commercial development, numerous residential buildings were demolished, and the neighborhoods were greatly affected by the construction of I-5 (Becker 2007).

In 1974, the 12th Avenue Bridge (1912) that links the International District to Beacon Hill was renamed in honor of Dr. Jose P. Rizal. Dr. Rizal was a nineteenth century Filipino patriot, artist, historian, and writer who was executed by the Spanish for his anti-colonial efforts on behalf of all Filipinos. After a campaign begun in 1960 by Filipino American civil rights activists Tinidad Rojo and Vic Bacho, the bridge was renamed, and in 1981, the Dr. Jose P. Rizal Park was constructed in his honor (Hedden 2013).

Area 6: West Seattle

Shortly after the Denny Party arrived at Alki Point in 1851, most of them moved to the east shore of Elliott Bay to escape the grueling spring storms. Only one settler, Charles C. Terry, remained, and he platted the town of Alki in 1853, and opened a general store, sawmill, and post office. Three years later, Terry traded his land to David S. Maynard for land downtown, and left Alki behind. In 1868, Maynard sold the land to Hans M. Hanson, when he found it could not support farming (Corley 1969c; Sherrard 2016; Tate 2001).

By the late 1870s, a number of industries were established along what is now Harbor Avenue at Elliott Bay, including a salmon cannery, sawmill, and shipbuilders. Industrial workers lived in the mill town of Freeport (now Delridge), which provided housing and other services (City of Seattle 2023e; Tate 2001).

During the 1880s and 1890s, the West Seattle area began to see residential and commercial development. In 1885, the West Seattle Land & Improvement Company (WSL&IC) purchased most of the land in the Admiral district, replatted it, and in 1888, the company developed a residential area they called "West Seattle" (City of Seattle 2023e; Tate 2001). The WSL&IC made transportation and other improvements to the area. They operated a ferry that carried passengers and supplies to and from Seattle and ran a cable car line up the hill into town. In 1898, the cable car ceased operation. In response, the City of West Seattle established a municipal streetcar system, which was operational by 1905. The City operated the streetcars for about a year, then sold the system to the Seattle Electric Company. They expanded the system to the south into a sparsely populated area of the peninsula, sparking a real estate boom (City of Seattle 2023e; Tate 2001).

Around 1895, the U.S. Army Corps of Engineers started to dredge the Duwamish River, which spurred additional industrial development in the area. The dredged material was dumped near the mouth of the river, creating Harbor Island. By this time, a business district was thriving near the ferry dock and the industrial area along the northeast shore (City of Seattle 2023e; Tate 2001; Wilma 2001c). Also, around this time, the NP constructed a trestle bridge to carry the rail line across the Duwamish River and connect to the WSL&IC ferry (Tate 2001).

In 1902, the residents of West Seattle incorporated as the City of West Seattle after the WSL&IC failed to continue making improvements. The city shared the peninsula with the unincorporated residential communities of Fauntleroy, Gatewood, Highland Park, Arbor Heights, Spring Hill, Youngstown, and Alki, which was a burgeoning summer recreation spot. Wealthy residents from Seattle began purchasing lots and building vacation homes in the area. One such buyer was William Bernard. In 1903, Bernard and his wife Gladys built their home, Fir Lodge at Alki Point, where they entertained frequently. After a few years, the Bernards sold the building, which was used over the years as a public event space, rental home, clubhouse, private residence, and finally as a restaurant by the 1950s. The Fir Lodge was listed in the NRHP in 2020 (Johnson 2020; Tate 2001).

By 1906, Alki had transformed into a summer playground and resort with residential tracts for sale along the beach and west of the point. The area boasted a small neighborhood filled with summer homes overlooking Puget Sound, a natatorium, an amusement park, bandstand, outdoor dining, swimming, boating, and other seasonal attractions. A steamship delivered passengers from Seattle to Alki Point, and a streetcar line extended into the area. Such amenities triggered additional residential and hotel development in the surrounding neighborhoods. In 1907, the City of West Seattle annexed Alki, Youngstown, and Spring Hill, and within a month, the City of Seattle annexed most of the West Seattle peninsula (City of Seattle 2023e; Sherrard 2016; Tate 2001). The area commonly known as Alki Beach Park, encompassing Alki Point and Duwamish Head, was listed in the WHR in 1969 (Corley 1969c).

Beginning in 1908, residents in the Alki area, including Ferdinand Schmitz, donated land to the City for a park, as great swaths of area forests were logged over for development. Originally named Forest Park, the 53-acre Schmitz Preserve Park contains old growth timber and nearly 2 miles of trails. In the Olmsted Brothers' 1908 report for Seattle's parks and boulevards, they recommended construction of a picnic shelter, pergola, trails, scenic water feature, and waterfall in the park (Beckner and Perrin 2016; Friends of Seattle's Olmsted Parks 2023a).

In 1911, the U.S. Lighthouse Service purchased Alki Point from Hans Hanson's son Edward (or Edmund). Although a lighthouse at the point was initially requested in 1895, Congress appropriated the funds in 1913, and the U.S. Lighthouse Service built the Alki Point Lighthouse comprising a concrete fog signal building and octagonal lighthouse. The lighthouse was originally a manned station, with two lighthouse keepers' houses built just east of the lighthouse structure. In 1984, the lighthouse was automated, and in 2002, the federal government declared it surplus. The lighthouse continues to function as a navigation aid at the present time and is managed by the U.S. Coast Guard (Anderson 2023).

Infrastructure improvements were needed after the ferry was discontinued in 1921. Within a span of a few years, the City Council approved funding for two bridges across the Duwamish River. One was completed in 1924 and the other in 1930. In 1984, a high bridge was built, replacing the two earlier bridges (Tate 2001).

In the 1920s and 1930s, like many neighborhoods in Seattle, racially restrictive covenants were found in a number of residential developments in the West Seattle area. One example of such racially restrictive covenants was found in 28 property deeds of the Williams Alki Addition subdivision. Developed by Franklin and Mary Williams between 1926 and 1929, this covenant was included in the deeds, restricting the sale or rental of the property to Asian Americans, Filipino Americans, and African Americans (UW 2020).

In 1934, the last of three Natatoriums on Alki Beach was constructed by a private developer, north of the lighthouse on the shore. The Alki Natatorium was an indoor swimming pool housed within a glass-roofed building. Initially closed in 1939 after a tragic accident, the property was taken over by the City of Seattle and reopened in 1942. The property closed and was demolished in 1953, as renovation costs were deemed too high. The site was filled and landscaped (Corley 1969c; Sherrard 2016).

Area 7: Duwamish

The first non-Indigenous settlers in the Duwamish area were Luther Collins, Jacob Maple, Samuel Maple, and Henry Van Asselt, who filed land claims in the early 1850s. In 1871, developer Julius Horton purchased some of the Collins claim, and platted Georgetown (Wilma 2001a).

The Duwamish area soon became the industrial powerhouse of Seattle. In 1874, enterprising locals in Seattle built the S&WW from its start at Steele's Landing in Georgetown to the coal fields near Renton and then north to those near present-day Newcastle (Link 2004:3; MacIntosh and Crowley 1999; Smith 1983; Wilma 2001a).

In 1883, Andrew Hemrich and John Kopp founded Bay View Brewery overlooking Elliott Bay. The brewery was renamed Seattle Brewing and Malting Company Brewery Bay View Branch in 1893, Bay View Milling Company in 1919, Century Brewing Association in 1933, and finally in 1936, Rainier Brewery. Over the years, the Bay View Brewery expanded numerous times, was one of the area's largest employers and the historic property was listed in the NRHP in 2012 (Howard and Chase 2012).

Around 1895, the U.S. Army Corps of Engineers started to dredge the Duwamish River, which spurred additional industrial development in the area. The dredged material was dumped near the mouth of the river, creating Harbor Island (Tate 2001; Wilma 2001c).

By the turn of the twentieth century, agriculture was the main industry in the Duwamish area and in 1904, Georgetown was incorporated (Smith 1983; Wilma 2001a). In 1907, the Georgetown Steam Plant began operation as a "standby" electrical plant, only switching on during peak demands for power. In 1951, Seattle City Light purchased the property, and it was last operated in 1972. The Georgetown Steam Plant was listed in the NRHP in 1984 (Caldbick 2016). In 1910, Seattle annexed Georgetown (Wilma 2001a).

In the Olmsted Brothers' 1908 report for Seattle's parks and boulevards, they recommended a playfield in the South Park neighborhood. By 1910, just over 5 acres of land was purchased, and two years later, the City began construction of the ballfield (Beckner and Perrin 2016; Friends of Seattle's Olmsted Parks 2023b).

In order to create more land along the Duwamish River for agriculture and industry, beginning in 1913 the area was logged; the river was rerouted, straightened, and channelized; and the tidelands were drained, dredged, and filled. The renamed Duwamish Waterway supported large industrial complexes, such as shipbuilders, foundries, clay and coal plant, terracotta factory, an antimony smelting and refining plant, iron works, flour mill, meat packer and slaughterhouse, creosoting works, lumber mills, warehouses, and Boeing Company Plant 1, which was constructed in 1916 to build aircraft for the military (Oldham 2020; Updegrave 2016; Wilma 2001c).

Founded by William E. Boeing, the Boeing Company struggled financially after World War I. Boeing began manufacturing furniture, power boats, and sea sleds. The company organized a subsidiary company to deliver mail and began making fast, powerful aircraft for mail delivery.

1928, King County established Boeing Field after Boeing threatened to leave the Seattle area (Crowley 2003).

In 1932, another industrial complex, the Ford Motor Company Assembly Plant, was built in the Duwamish area. The plant, designed by Albert Kahn, promised to employ 2,000 workers in automobile production. However, due to the economic impacts of the Great Depression, the plant shut down after six months and was operated as a Ford sales and service facility until 1941. Ford sold the plant to the U.S. military, who expanded the property to be used as an U.S. Army Depot. The property was leased to and then purchased by Boeing for a missile production center and finally sold back to the federal government for military use. The Ford Motor Company Assembly Plant was listed in the NRHP in 2013 (Lamprecht and Hetzel 2013).

This industrial growth created additional employment opportunities, and additional residences and apartment buildings were constructed in the surrounding residential neighborhoods to house the influx of workers (Oldham 2020; Updegrave 2016).

Like most of the United States, the Great Depression hit Seattle hard, as the area's industries faltered, jobs were lost, and subsequently, the population fell. The arrival of World War II and the corresponding growth in war supporting industries slowed the decline. Also, during World War II, the U.S. Government created the Bracero Program to create a pathway for Mexicans to migrate to the U.S. to fill a labor shortage in the agriculture and war industries. Boeing was one of those industries that thrived during the war. By 1944, the company expanded to employ tens of thousands of workers, who made thousands of aircraft in support of the war effort. Many of these workers were from Mexico. They were originally brought to work in the central and eastern Washington's agricultural regions through the Bracero Program; some then migrated to western Washington to obtain jobs in the higher-wage war industries, such as Boeing. Many of these workers and their families settled in the South Park neighborhood. Boeing's support continued through the Cold War and Korean War, then in the 1960s began manufacturing domestic airliners. During the Boeing Bust beginning in 1969, Boeing laid off a total of 86,000 workers. The Bust caused a regional economic decline, but by 1972, Boeing was back on track manufacturing for the military and airlines across the globe (Gamboa 2019; Kershner 2015; Sanchez 2011).

Area 8: SE Seattle

The neighborhood of Beacon Hill had its beginnings on Henry Van Asselt's land claim, which early non-Indigenous settlers called Maple Hill. These settlers harvested timber and farmed, and many platted their lands between 1869 and 1878. One of the first African Americans to purchase land in the Beacon Hill area was businessman George Riley, who, backed by a group of Portland investors, bought land in 1869. These lands were platted in 1875 as Riley's Additions to South Seattle. The northern side of Beacon Hill was annexed to Seattle in 1883 (Tobin 2004a; Wilma 2001e).

The first non-Indigenous settler in the area that would become Rainier Beach was Joseph Dunlap and his family. Like many other early settlers, he built a cabin, farmed, logged, and sold land to other settlers, and in 1904, Dunlap donated land for a school (Tobin 2004b).

By 1889, the north end of SE Seattle was dotted with small farms. Residential growth was stimulated when streetcars reached newly platted neighborhoods. The installation of a streetcar line between downtown and north Beacon Hill in the early 1890s led to residential construction in the area. Along the Rainier Valley, residential development boomed when J. K. Edmiston built the Rainier Avenue Electric Railway in 1891. By 1896, the line covered 12 miles and was renamed the Seattle, Renton and Southern Railway. The line opened up the area for additional settlement, and farmers used it to deliver crops into the Seattle markets. Hillman Investment Company bought some of Dunlap's land and platted the Atlantic City Addition in Rainier Beach in 1905. (Crowley 1999; Tobin 2004a; Wilma 2001e, 2001f).

In 1898, the City bought 235 acres from the state on the north side of Beacon Hill and, in 1911, built two water reservoirs there. This property became Jefferson Park in 1915 (Tobin 2004a; Wilma 2001e). In 1907, the City of Seattle annexed the Rainier Valley communities and the south side of Beacon Hill (Tobin 2004a, 2004b).

In 1904, Seattle Public Schools built the Beacon Hill School, and in 1912, the school was expanded to handle a growing student population. In 1909, Seattle Public Schools built the Colman Elementary School and later expanded it in 1940. Beacon Hill and Rainier Valley saw moderate development until about 1920 and into the 1930s, when a number of Italian and Japanese immigrants built homes on large lots and put in expansive gardens. Some of these landowners sold their produce at markets downtown, while others opened local community shops and restaurants (Handy et al. 2019; Tobin 2004a, 2004b).

In the Olmsted Brothers 1903 report for Seattle's parks and boulevards, Olmsted recommended the development of the Mt. Baker ravine into Mount Baker Park with a connecting parkway linking the park with present-day Jefferson Park, and construction of a boathouse and pier (Beckner and Perrin 2016; Friends of Seattle's Olmsted Parks 2023c).

In the 1920s and 1930s, in the SE Seattle area, racially restrictive covenants were found in a number of residential developments. One example of such racially restrictive covenants was found in 622 property deeds of the Ladd's 2nd Addition and Jefferson Park Addition #2 subdivisions. Developed by George Spencer between 1927 and 1930, the covenant restricted occupancy of the properties by anyone "other than one of the white or Caucasian race" except as domestic servants (UW 2020).

In 1931, the U.S. Public Health Service built the U.S. Marine Hospital on the north end of Beacon Hill. This monumental building anchors the north end of the SE Seattle area and was listed in the NRHP in 1978 (Kreisman 1978). As Boeing expanded during the lead up to World War II, wartime housing in the nearby Beacon Hill boomed, and the Seattle Housing Authority built projects such as the Rainier Vista and Holly Park developments. During World War II, the residents of Japanese ancestry who lived in the area, were forcibly removed and incarcerated

for the duration of the war. After the war ended, many Japanese residents never returned to the area, and many lost their businesses and homes, and their former farmlands were developed (Kreisman 1978; Studio TJP 2021; Tobin 2004a).

Also, during World War II, the U.S. Government created the Bracero Program to create a pathway for Mexicans to migrate to the U.S. to fill a labor shortage in the agriculture and war industries. While originally brought to work in the central and eastern Washington's agricultural regions through the Bracero Program, some of these workers migrated to western Washington to obtain jobs in the higher-wage war industries, such as Boeing. Some of these workers and their families settled in the SE Seattle area (Gamboa 2019; Kershner 2015; Sanchez 2011).

After World War II, development in the SE Seattle area began again with a new Veterans Hospital (built in 1951) in Beacon Hill, new schools in many communities, and an influx of single-family homes and multi-family residential apartments across the communities. Around the same time, African Americans, Filipino Americans, Mexican Americans, Chinese Americans, and Southeast Asians began moving into the Beacon Hill area, creating a diverse community. In the South Beacon Hill neighborhood, Chinese American architect Jimmie S. Eng, who emigrated from China in the mid-1920s, designed and built a home for his family in 1966. The home was listed in the NRHP in 2019 (Chinn 2022; Cook 2019; Tobin 2004a).

The area's population that had stagnated during the Great Depression began to climb after World War II. By the 1960s, the post-war baby boom, urban flight, desegregation, and the Boeing Bust moved residents out of the city into the suburbs, which prompted the city to build new schools in the suburbs, including in Beacon Hill. The area's students were moved to new schools, and by 1971, the old Beacon Hill School building was vacant (Handy et al. 2019; Wilma 2001e). On October 11, 1972, frustrated by discrimination and lack of solutions to the challenges they faced, a coalition of the area's community leaders, including Roberto Maestas from the Chicano community, Larry Gossett from the African American community, Bernie Whitebear from the Native American community, and Bob Santos from the Asian American community, occupied the vacant school with over 100 supporters. It took until May 1973 for the City to sign a lease with the group, who then established El Centro de la Raza, a social service, civil rights organization, and community resource center. In 1999, El Centro purchased the building, which was listed in the NRHP in 2019 (Handy et al. 2019; Wilma 2001e, 2001f).

In the early 1960s, the Chevra Bikur Cholim congregation moved to Seward Park. After merging with Congregation Machzikay Hadath in 1971, they sold Synagogue No. 3 in the Central District to the City of Seattle. The following year, in 1972, Congregation Bikur Cholim—Machzikay Hadath completed Synagogue No. 4 in Seward Park (BCMH 2023; Michelson 2023).

In 1965, the Filipino Community Center opened on what is now Martin Luther King Jr. Way South, in Hillman City neighborhood (Chinn 2011).

The Colman Elementary School closed in 1973, as enrollment had plummeted. The school was used for a short time as a temporary, alternative school facility, before closing permanently in

1985. That year, a group of African American activists occupied the building, hoping to convince the City to allow them to create the Northwest African American Museum on the lower floor, with 36 lower-income apartments on the upper floor. The move was successful, and in 2008 the project was completed. The Colman School was designated a Seattle Landmark and listed in the WHR in 2005 (Johnson Partnership 2005a, 2005b).

In 1974, the 12th Avenue Bridge (1912) that links the International District to Beacon Hill was renamed in honor of Dr. Jose P. Rizal. Dr. Rizal was a 19th century Filipino patriot, artist, historian, and writer who was executed by the Spanish for his anti-colonial efforts on behalf of all Filipinos. After a campaign by Filipino American civil rights activists, the bridge was renamed, and the Dr. Jose P. Rizal Park was constructed in his honor (Hedden 2013).

Acronym Definitions

BSO—Buildings, Structures, Objects

DAHP—Washington Department of Archaeology and Historic Preservation

GLO—General Land Office

HPI—Historic Property Inventory forms

NHL—National Historic Landmark (the Nation's highest level of significance)

NRHP—National Register of Historic Places

SL—Seattle Landmarks

TCP—Traditional Cultural Properties

WHBR—Washington Heritage Barn Register

WHR—Washington Heritage Register

WISAARD—Washington Information System for Architectural and Archaeological Records database

Current Conditions

Data & Methods

To establish the presence and location of known historic and cultural resources in the study areas, for the purposes of this report, a GIS Specialist gathered building data from the King County Assessor's website, reviewed DAHP's online database, WISAARD, and Seattle City Landmarks online database for:

- Historic-period aged parcels;
- cultural resource survey reports;
- archaeological site records;
- HPIs;
- TCPs; and
- NHL-listed, WHBR-listed, NRHP- and WHR-listed and eligible resources; and
- SLs.

Cultural Data Sources

City of Seattle Landmarks List

- Established by City's Landmark Preservation Ordinance in 1973.

- Landmarks Preservation Board reviews and approves nominations, negotiates a Controls and Incentives Agreement with the property owner, and issues designations. The City Council issues a designating ordinance. The Board also reviews proposed alterations to Landmarks and issues Certificates of Approval.
- Affords the highest protection for designated historic properties.
- Landmarks List database contains a property's Landmark nomination form, designation reports, and the designating ordinance imposing controls upon the property.
- Landmarks List contains over 400 designated improvements (buildings and structures), objects, and sites.
- Landmarks Map shows location of each Landmark and each Landmark District.
- To be considered for designation, resources must meet certain designation standards. The resource must be at least 25 years old; must have significant character, interest, or value as part of the development, heritage or cultural characteristics of the city, state, or nation under one or more of the six criteria for designation; and must have sufficient integrity to convey its significance.
- For more information, go to https://www.seattle.gov/neighborhoods/historic-preservation/city-landmarks.

City of Seattle Landmark Districts

- Established by the City's Landmark Preservation Ordinance.
- There are eight historic Landmark Districts, each is regulated by a District Board or the Landmarks Preservation Board, per the District's Ordinance.
- Landmark Districts website links to each District's page with a short history, boundary map, link to the District Ordinance, guidelines, forms, FAQs, and Board meeting schedules, agendas, and minutes, and other information.
- For more information, go to https://www.seattle.gov/neighborhoods/historic-preservation/historic-districts.

King County Assessor's website

- Data includes GIS locational data (parcel number and address), year built, and year renovated for each building/structure on each parcel. Parcels that contain a building that is 40 years old or older are indicated on the "Historic-Aged Parcels and NRHP-Eligible Properties" maps.
- This data is updated regularly with information from renovation and demolition permits.
- For more information, go to https://kingcounty.gov/services/gis/Maps/parcel-viewer.aspx.

Washington Department of Archaeology and Historic Preservation (DAHP) WISAARD database

- The state's repository for public cultural resource data (NRHP-, WHR-, and NHL-listed and NRHP-eligible (for listing) historic properties/districts, cultural resource survey reports, historic property inventory (HPI) forms, and archaeological predictive model) and non-

public archaeological data (archaeological site forms, most TCPs, and archaeological inventory reports).

- Data is updated as surveys and inventories are performed, and new information is entered.
- Some HPI forms were created by data transfer for a series of Assessors Data Projects for a few counties in the state. The resources were not formally surveyed and recorded, have neither eligibility recommendations nor determinations of eligibility, and the forms contain no survey data.
- For more information, go to https://wisaard.dahp.wa.gov/.

Black Historic Sites Survey

- Sponsored by the National Park Service (NPS), DAHP, and the City of Tacoma.
- Initiated by the 1985 work of Esther Mumford, *Black Heritage Survey of Washington State*.
- Work continues on identifying and documenting Black Historic Sites by a team comprising Guided Methods with project lead, Monette Hearn, and Studio TJP.
- The study identifies Black creators, including architects, designers, engineers, artists, builders, etc. whose work contributes to the history of Washington.
- Survey includes public outreach and extensive research and documentation, HPI forms, biographies, and the identification of up to 50 significant sites.
- Additional goals include the nomination of two sites to the NRHP and the identification of other important Black History sites across the state.
- For more information, go to https://www.blackhistoricsiteswa.com/.

Latino Heritage Survey Sites

- Sponsored by NPS, the Washington Trust for Historic Preservation (WTHP), and DAHP in 2015 and 2018.
- Study by Artifacts Consulting in the greater Seattle area and the Yakima Valley.
  - The study included oral interviews with community members, 37 HPIs, two NRHP nominations, and a report Latino Heritage of Greater Seattle: Intensive Level Survey Documentation and Illustrated Historic Context Statement (2019), with the historic context, "King County Latino Heritage: WWII–1980s" written by Dr. Erasmo Gamboa.
  - 20 sites were identified in Seattle.
- For more information, go to https://dahp.wa.gov/sites/default/files/Seattle_Latino_ContextStudy_2019.pdf.

To plot the location of architectural resources for this EIS, a GIS Specialist created maps, using Alternative 5 as the base map because it was the most extensive amount of change studied in the Draft EIS and it allows for the maximum impact analysis. These maps show~~ing~~ the locations of parcels that meet the following criteria:

- Include SL designated historic properties and districts;

- Include NRHP-listed or NRHP-eligible historic properties or are included in NRHP-listed historic districts; and
- Include built resources 40-years-old or older (old enough to require evaluation for listing in the NRHP, WHR, WHBR and NHL).

The Seattle Historic Resources Survey Database was not utilized in the creation of the architectural resources maps. This database was compiled from survey and inventory projects that began in the late 1970s–1980s, were revived again in 2000, and although funding was discontinued in 2011, some survey work continued for a few years after that. The approximately 8,000 resources entered in the database have varying levels of documentation. Some have been surveyed and inventoried, and contain background research, description of the resource, brief discussion of the resource's integrity, and evaluation of its significance. Some database entries have little to no information about the resources, contain no discussions of integrity or significance, and make no evaluation recommendations. None of the resources in the database have formal evaluations for eligibility to the SL, NRHP, or WHR. Very few of the resources have been updated since their initial documentation—some of which were written over 30 years ago. Additionally, due to the lack of updating, it is unknown if resources have sustained alterations over time that may have led to loss of original character-defining features including style, design, form, materials, site/landscaping. It is also unknown how many of the resources are still standing or how many were demolished. Thus, the database does not contain data useful for analysis for this EIS and these resources were not added to the maps in this report. However, the database remains a useful tool when performing property research.

To prepare historic contexts for the project areas, which can be used to assist researchers in analyzing the significance of cultural resources, the consultants reviewed published and online sources, gathering information on the environmental, archaeological, and historical context of the project vicinity. As part of the Seattle Historic Resources Survey projects, a number of historic contexts were developed about many of Seattle's neighborhoods. They were written between 1997 and 2015 and were utilized for this EIS. The consultants reached out to a number of cultural community experts to gather information on culturally important resources within their community. Research staff also examined historic-period maps and aerial photographs, including GLO plats, which are nineteenth-century maps available online through the Bureau of Land Management (BLM) website. They can be used to locate potential historical features including former structures, trails, and transportation routes. Although these features may no longer be extant, these maps indicate where historic-period cultural resources, including archaeological materials, may be encountered. Other historic maps (e.g., U.S. Geological Survey [USGS] maps, Sanborn Fire Insurance maps, County atlases) were reviewed through online resources.

Based on environmental characteristics, ethnographic data, and the distribution of previously recorded cultural resources, HRA formulated initial expectations about the sensitivity of the analysis areas for containing cultural resources. DAHP's statewide predictive model layer was also reviewed for probability estimates of the presence of precontact cultural resources.

Citywide

Cultural resources identified in the full study area (including architectural resources such as districts, sites, buildings, landscapes, structures, or objects, and archaeological resources such as precontact Native American artifacts, features, and sites; Traditional Cultural Properties; and historic-period artifacts, features, and sites) that are 40 years old or older, and listed or eligible for listing in the NHL program, NRHP, WHR, WHBR, or in the SL program, whose age threshold for inclusion is 25 years old or older.

Architectural Resources

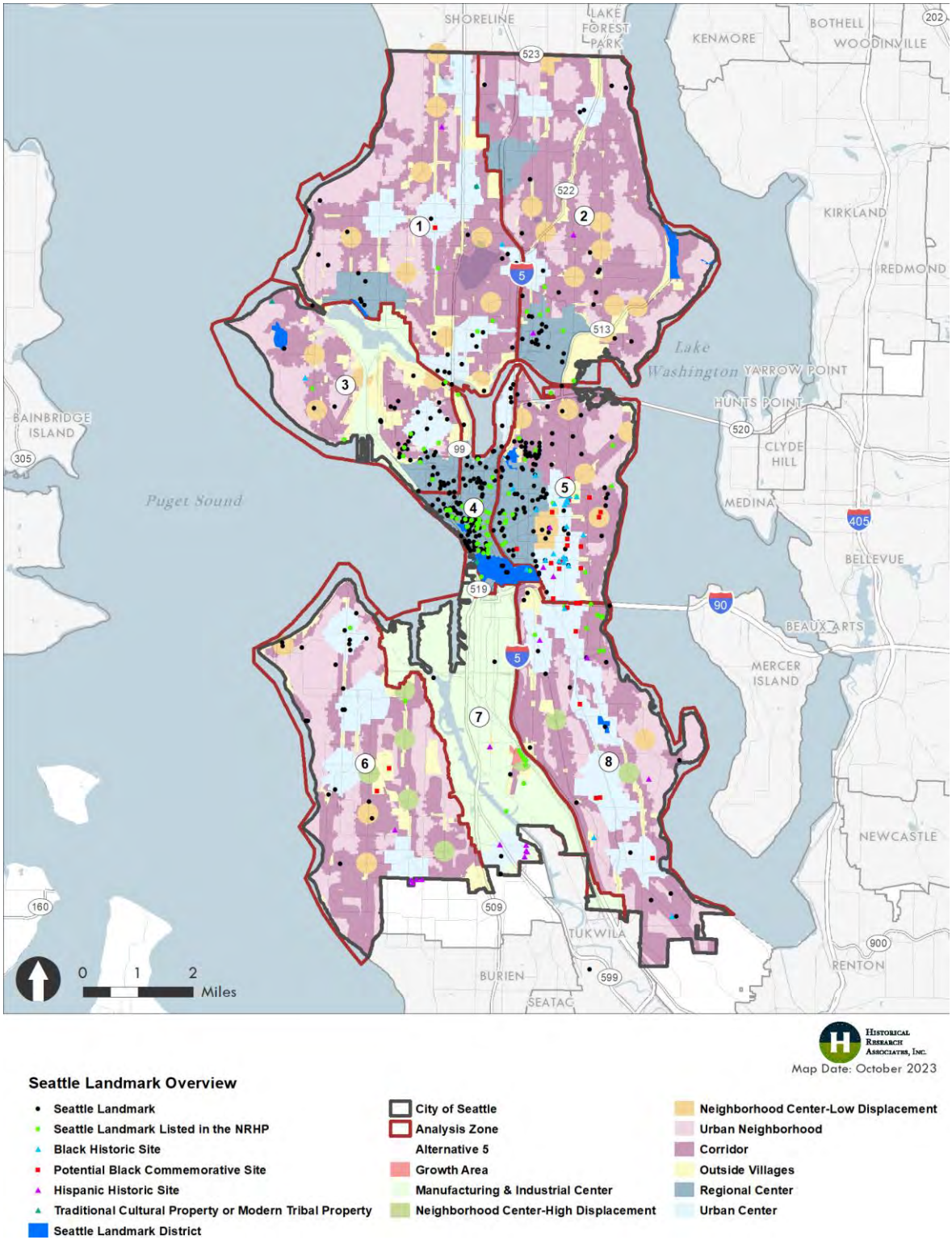
Within the Citywide study area, there are 7 NHL properties and several properties that are listed in the SL, NRHP, and WHR. There are 8 Seattle Landmark Districts, 24 NRHP-listed historic districts, and 1 WHR-listed historic district in the full study area. Citywide there are 474 properties that are designated Seattle Landmarks, 200 NRHP-listed historic properties, and 48 WHR-listed properties. Additionally, there are 31 Black Historic Sites, 28 Potential Black Commemorative Sites, and 20 Hispanic Historic Sites (Culturally Important Resources) within the citywide study area (**Exhibit 3.9-1** and **Exhibit 3.9-2**) (Sources: the Washington State Black Historic Sites Survey and the 2018 Latino Heritage Survey). There are no historic agricultural barns listed in the WHBR within the study area.

Current King County Tax Assessor's data provides one indication of how many historic-period, built-environment resources are located within the study area. For the purposes of this EIS, the historic period refers to buildings that are 40 years old or older. According to the King County Tax Assessor, there are 135,367 historic-period buildings within the full study area, of which 124,037 are residential buildings (single-family dwellings, townhouses, duplexes, triplexes, fourplexes, apartment buildings, and condominiums), and the remaining 11,330 are commercial, industrial, and governmental buildings (**Exhibit 3.9-3**).

In contrast, DAHP's WISAARD database provides another indication. WISAARD records show 104,492 built resources within the full study area that were 50 years old or older in 2011. Of these, 1,208 were determined NRHP-eligible by DAHP or a federal agency (**Exhibit 3.9-3**). In 2011, WISAARD was updated for an Assessors Data Project for King County to provide a snapshot of buildings that were constructed in 1961 or earlier. These buildings were issued historic property identification numbers and HPI forms. The HPI forms created by the Assessors Data Project were not formally surveyed and recorded, have neither eligibility recommendations nor determinations of eligibility, and the forms contain no survey data of any kind.

The discrepancy between the Assessor's and DAHP's records are likely due in part to demolitions that alter County Tax Assessor's records but do not change the records in DAHP's WISAARD database, and/or a lack of up-to-date survey and recordation of historic-period resources on HPI forms in WISAARD.

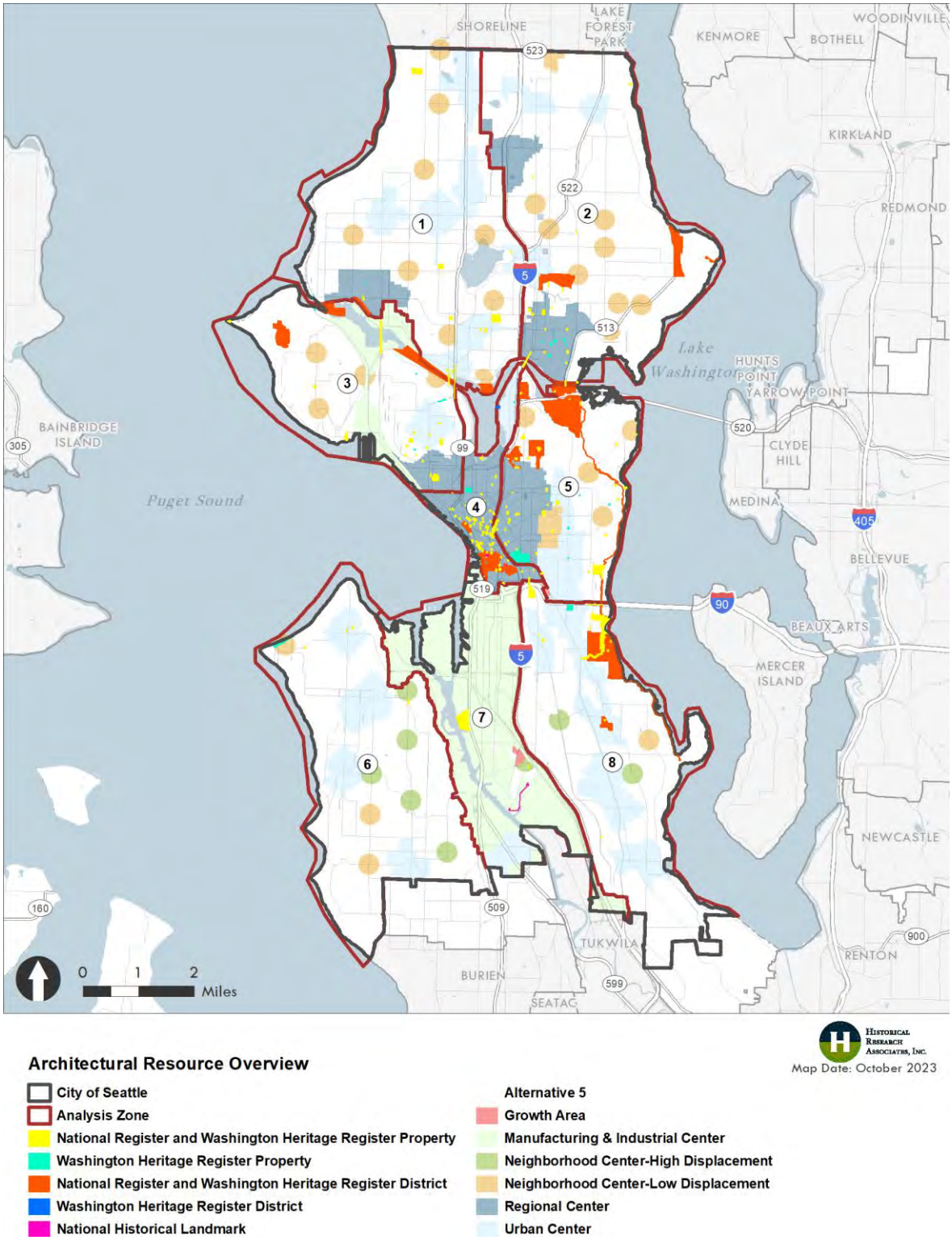
Exhibit 3.9-1. Designated Seattle Landmarks, Seattle Historic Districts, and Culturally Important Resources—Citywide



Note: Base map shown for the cultural maps is Alternative 5, as it was the most extensive amount of change studied in the Draft EIS and allowed for the maximum impact analysis.

Source: HRA, 2023.

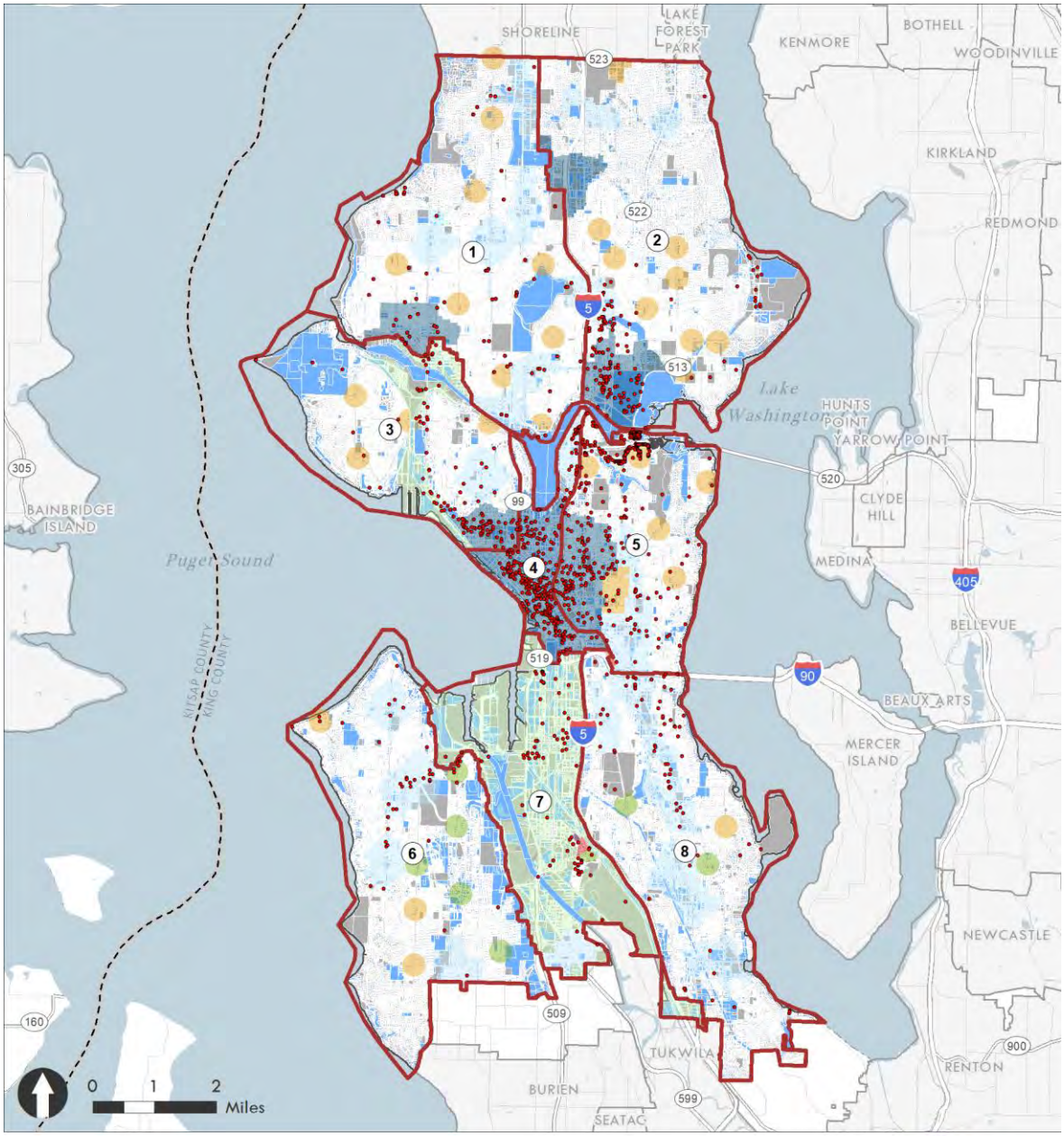
Exhibit 3.9-2. NRHP- and WHR-Listed Architectural Districts and Properties—Citywide



Note: Base map shown for the cultural maps is Alternative 5, as it was the most extensive amount of change studied in the Draft EIS and allowed for the maximum impact analysis.

Source: HRA, 2023.

Exhibit 3.9-3. Historic-Aged Parcels and NRHP-Eligible Properties—Citywide



Note: Base map shown for the cultural maps is Alternative 5, as it was the most extensive amount of change studied in the Draft EIS and allowed for the maximum impact analysis.

Source: HRA, 2023.

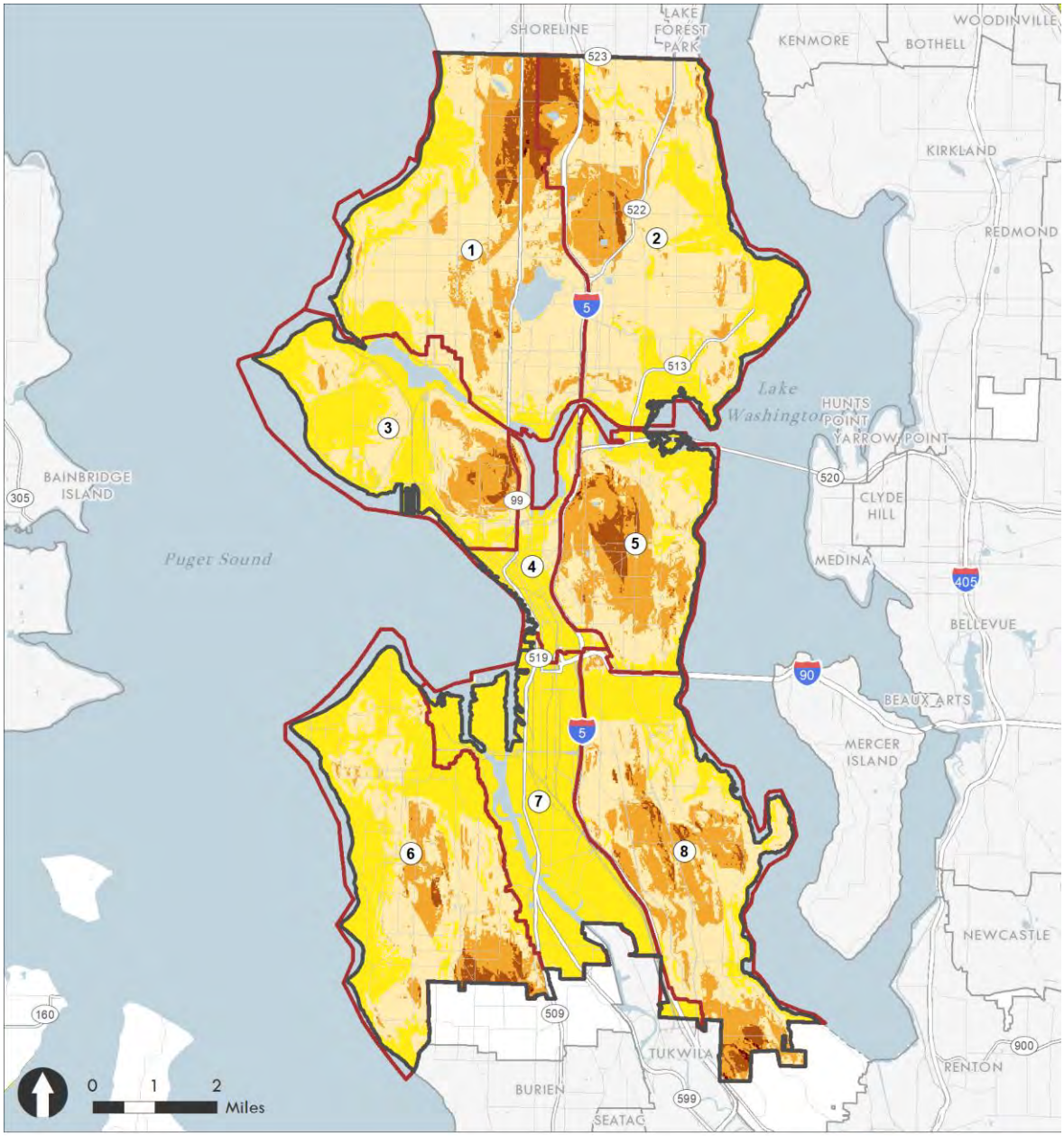
Archaeological Resources

Within the full study area, there are 135 previously documented archaeological sites. A total of 294 previous studies have been conducted within the full study area since 1995 that included archaeological investigations. One precontact site and two historic-period sites are listed in the NRHP and WHR. One of those historic-period sites is also a TCP. Two precontact sites and three historic-period sites have been determined eligible for inclusion in the NRHP. Two precontact sites and thirty-three historic-period sites have been determined not eligible for inclusion in the NRHP. The remaining thirteen precontact sites, seventy-five historic-period sites, and six multicomponent sites have not been formally evaluated. No TCPs were identified in WISAARD, however one, Ballast Island (45KI1189), is known to be within the full study area (Curti, et al. 2020; Elder and Cascella 2014; HRA 2018).

Per Washington state law (RCW 42.56.300), the locations of these sites are exempt from public disclosure in order to prevent their looting or depredation.

A majority of the area within each of the project subareas is considered of High or Very High Risk to contain precontact archaeological resources by DAHP's precontact archaeological site probability model, while areas of Moderately Low to Moderate Risk are typically located in hilly settings farther from permanent water sources (**Exhibit 3.9-4**).

Exhibit 3.9-4. Map Showing Archaeological Sensitivity from DAHP Model—Citywide



Source: HRA, 2023.

Maritime Washington National Heritage Area

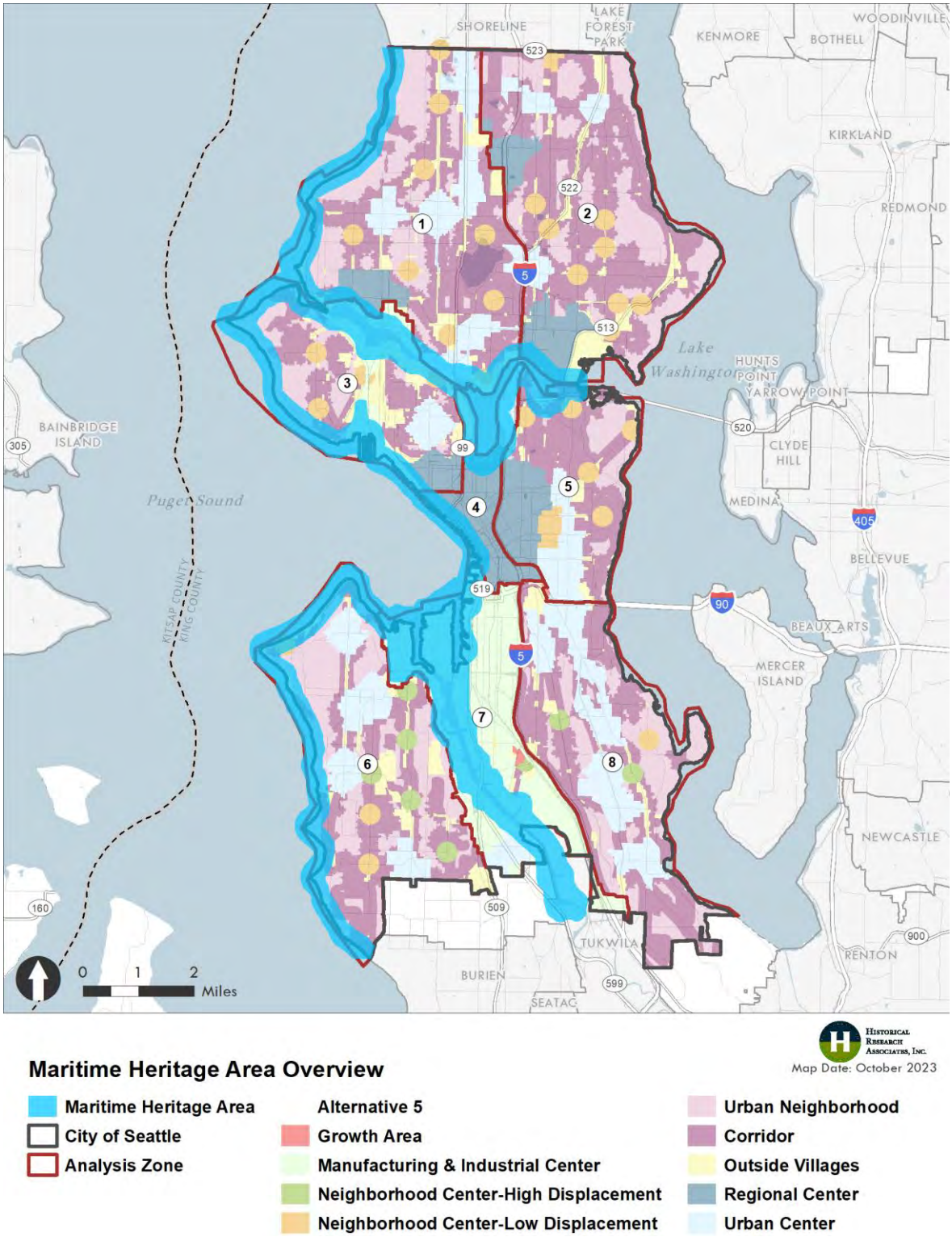
Congress designated the Maritime Washington National Heritage Area (MW NHA) in 2019 as a place recognized for its nationally important natural, cultural, historic, and recreational resources, which combine to form a nationally important landscape. The MW NHA stretches along 3,000 miles of saltwater shoreline from Grays Harbor County to the Canadian border. The MW NHA encompasses 18 federally recognized Tribes, 13 counties, 32 incorporated cities, and 33 port districts in Washington state. The MW NHA is a non-regulatory program coordinated by the Washington Trust for Historic Preservation (WTHP), Washington's statewide nonprofit historic preservation organization. The program will be guided by the Washington Trust Board of Directors, a Maritime Washington Advisory Board, and a Maritime Washington Tribal Working Group, with technical assistance and funding from the National Park Service (NPS). The MW NHA is a cooperative organization with regional representation that is supportive of tourism and economic development, and functions to build partnerships to support communities in maintaining and sharing their unique resources and telling the stories of those places (Maritime Washington 2022).

After receiving designation, the WTHP, with partners and community stakeholders developed a management plan that was submitted to the U.S. Department of the Interior and accepted in 2022. The plan includes the strategies, policies, and plans for the MW NHA program, guided by five key strategic goals:

- Goal One: Build a network of cross-sector partners dedicated to advancing, honoring, and stewarding Washington's maritime stories and resources.
- Goal Two: Provide support and resources for organizations, communities, and Tribes working to preserve, enhance, and share maritime heritage.
- Goal Three: Share diverse stories and increase visibility of Washington's maritime heritage, past and present.
- Goal Four: Encourage sustainable experiences of maritime heritage for residents and visitors alike.
- Goal Five: Preserve our region's unique maritime identity, resources, and lifeways.

The plan is an implementation framework that will guide the MW NHA's actions over the next five to fifteen years, and which includes directional guidance, interpretive plan framework, key sites from resources inventories, branding and marketing plan, business plan, and an implementation plan with short- and long-range actions and performance goals for the MW NHA (Maritime Washington 2022). **Exhibit 3.9-5** shows the portion of the MW NHA that occurs within the study area of this EIS. For more Information, go to the WTHP website, https://preservewa.org/programs/mariti--national-heritage-area/.

Exhibit 3.9-5. Maritime Washington Heritage Area that Occurs Within the Study Area



Note: Base map shown for the cultural maps is Alternative 5, as it was the most extensive amount of change studied in the Draft EIS and allowed for the maximum impact analysis.

Source: HRA, 2023.

Analysis Areas

Area 1: NW Seattle

There are 1 Seattle Landmark District and 3 NRHP-listed historic districts found in the NW Seattle analysis area (**Exhibit 3.9-6**). There are 32 designated Seattle Landmarks in the NW Seattle area. Of these, 10 are education-related buildings, 6 are residential buildings, 5 are commercial buildings, 3 are former libraries, 3 are fire stations, 2 are bridges, 2 are parks, and 1 is a pool building. These resources are significant under a variety of the six standards for designation (**Exhibit 3.9-7**).

Exhibit 3.9-6. Area 1: NW Seattle—SL-designated and NRHP-listed Districts

Property Name, Type	Register/List Date/Significance	Period of Significance
Ballard Avenue Historic District	SL / 1976 / Criterion A for Contributions to the Development of Seattle, Criterion B for Commercial Development in Ballard, and Criterion C for Architecture	1890–1940s
Ballard Avenue Historic District	NRHP / 1976 / Criterion A for Industry, Commerce, Transportation, Politics/Government, and Criterion C for Architecture	1890–1930
Chittenden Locks and Lake Washington Ship Canal, Historic District	NRHP / 1978 / Criterion A for Commerce, Politics/Government, and Criterion C for Architecture, Engineering, and Landscape Architecture	1906–1917
Gas Works Park, Historic District	NRHP / 2013 / Criterion A for Industry, and Criterion C for Landscape Architecture	1973–1978

Sources: DAHP, 2023.

There are 14 NRHP-listed resources and 2 WHR-listed resources found in the NW Seattle analysis area. Of these, 2 are former schools, 2 are fire stations, 2 are residential buildings, 1 is a garden, 1 is a commercial building, 1 is a religious institution, 1 is a ship, and 3 are bridges, which were listed in the NRHP under the *Historic Bridges and Tunnels in Washington State MPD,* and, finally, 3 are Carnegie libraries, which were listed in the NRHP under the *Carnegie Libraries of Washington TR* (**Exhibit 3.9-8**).

Current King County Tax Assessor records show that within the NW Seattle area, there are 34,045 historic-period buildings. Of these, 31,588 are residential, including 30,325 residential buildings (single family dwellings, townhouses, duplexes, triplexes, and fourplexes), 1,104 apartment buildings, and 159 condominiums. The remaining 2,457 buildings are commercial, industrial, and governmental (**Exhibit 3.9-9**).

In contrast, DAHP records show 25,709 individual historic-period architectural resources have been entered on HPI forms within the NW Seattle area. Of these, only 59 were determined NRHP-eligible by DAHP or a federal agency and are plotted on the map (**Exhibit 3.9-9**). Many of the 25,709 HPI forms were created by data transfer for an Assessors Data Project for King

County. The resources in these HPIs were not formally surveyed and recorded, have neither eligibility recommendations nor determinations of eligibility, and the forms contain no survey data of any kind.

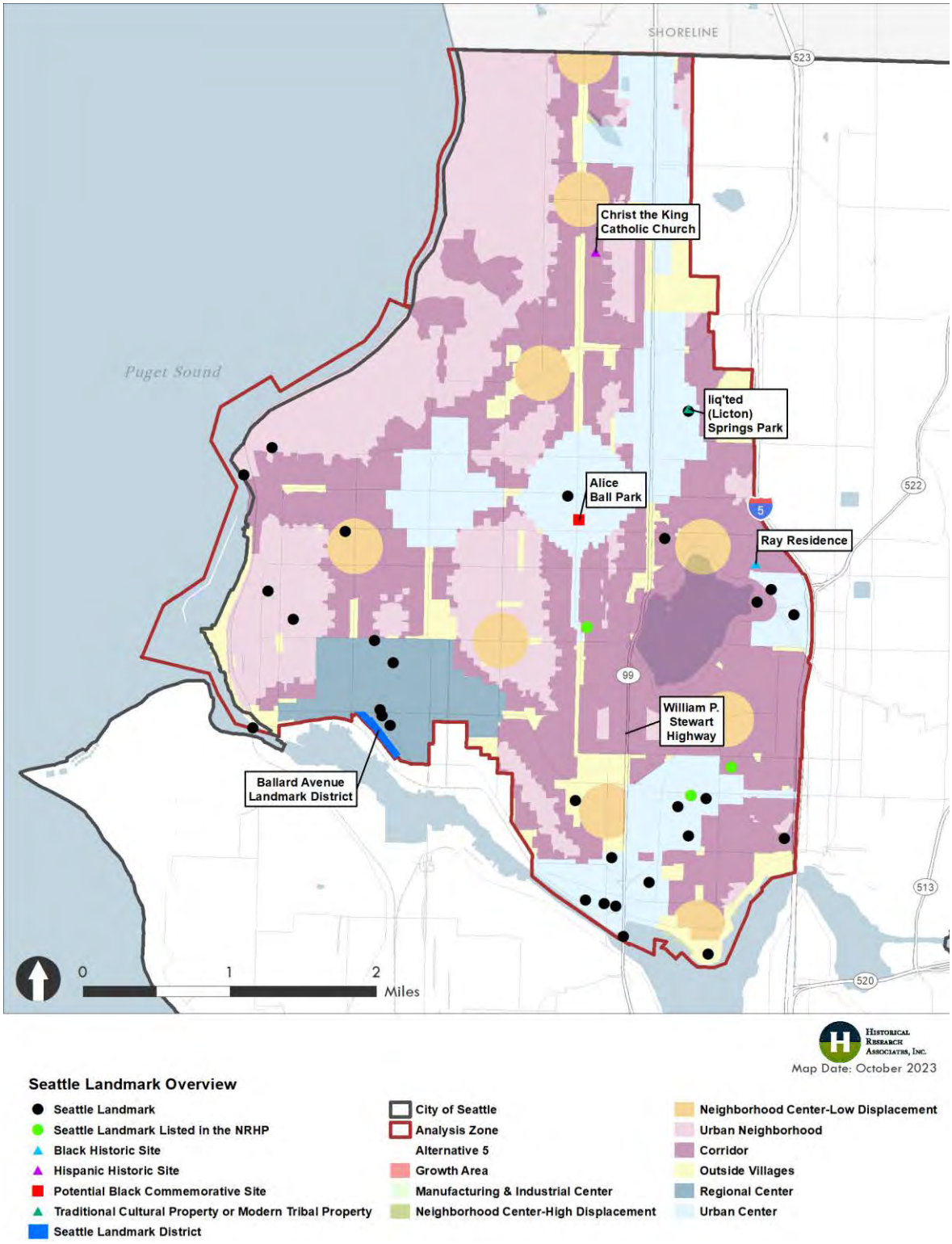
The discrepancy between the Assessor's and DAHP's records are likely in part due to demolitions that alter County Tax Assessor's records but do not change the records in DAHP's WISAARD database, and/or a lack of up-to-date survey and recordation of historic-period resources on HPI forms in WISAARD.

DAHP records show 40 cultural resources studies that included archaeological resources investigations that have been conducted within Analysis Zone 1 since 1995. One precontact site, six historic-period sites, and one multicomponent site have been recorded within Analysis Zone 1, none of which have been formally evaluated for listing in the NRHP. Most of the area within Analysis Zone 1 is considered of High or Very High Risk to contain precontact archaeological resources by DAHP's precontact archaeological site probability model. Areas of Moderately Low to Moderate Risk are located in upland settings to the west and southwest of Green Lake, as well as across the northeastern portion of Analysis Zone 1 (**Exhibit 3.9-10**).

Culturally Important Resources

There are 1 Black Historic Site (the Ray Residence), 2 Potential Black Commemorative Sites (Alice Ball Park, and the William P. Stewart Highway), and 1 Hispanic Historic Site (Christ the King Catholic Church) within Analysis Zone 1. Traditionally utilized as a clay source for the creation of red paint, a rust-red springs known as *l•qt¢d* ("Red Paint") is an important Tribal cultural resource located within present-day Licton Springs Park in Analysis Zone 1 (**Exhibit 3.9-7**) (Sources: the Washington State Black Historic Sites Survey and the 2018 Latino Heritage Survey; Thrush 2007:250–252).

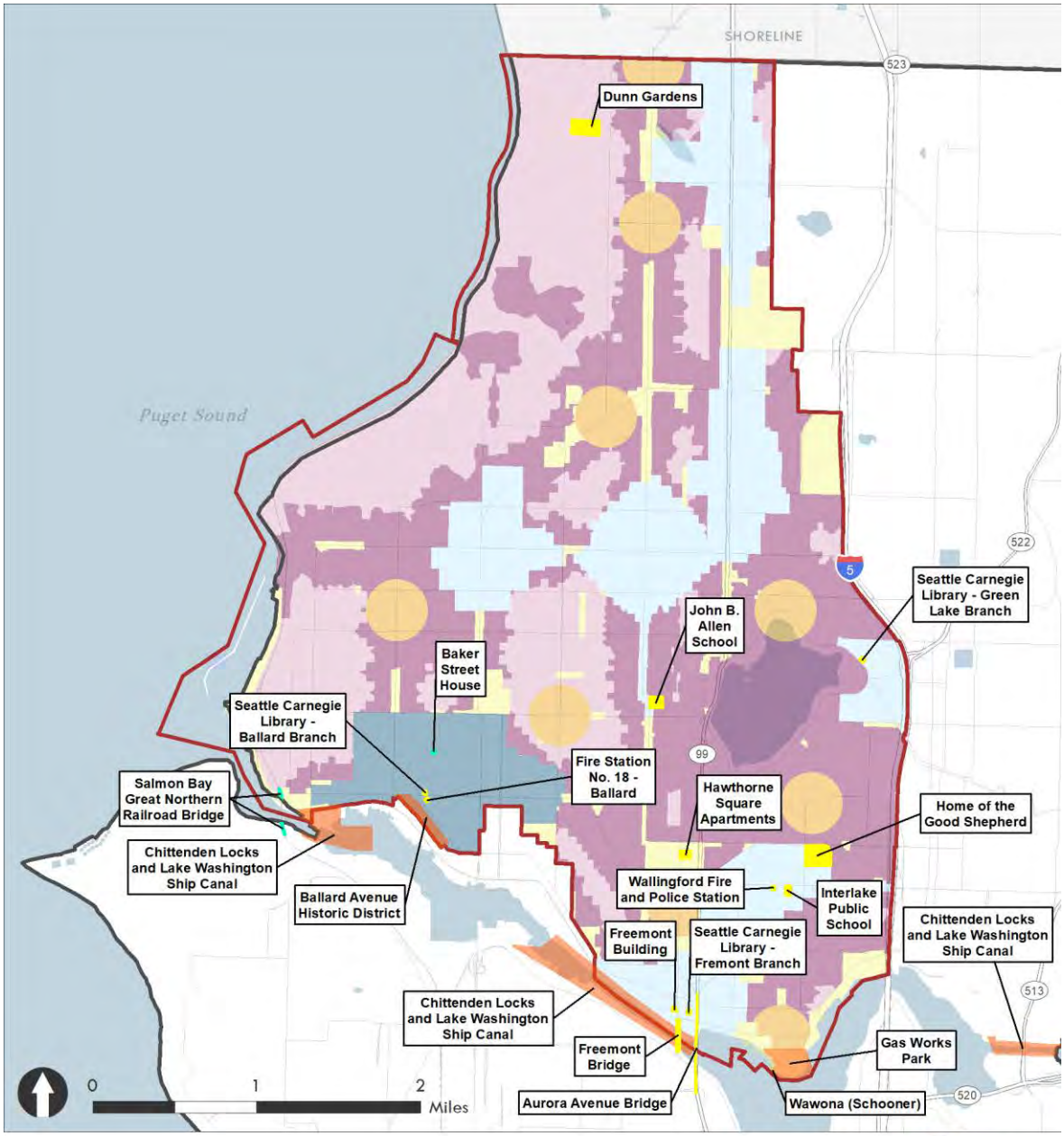
Exhibit 3.9-7. Area 1: NW Seattle—Designated Seattle Landmarks, Seattle Historic Districts, and Culturally Important Resources



Note: Base map shown for the cultural maps is Alternative 5, as it was the most extensive amount of change studied in the Draft EIS and allowed for the maximum impact analysis.

Source: HRA, 2023.

Exhibit 3.9-8. Area 1: NW Seattle—NRHP- and WHR-Listed Architectural Districts and Properties



Historical Research Associates, Inc.
Map Date: October 2023

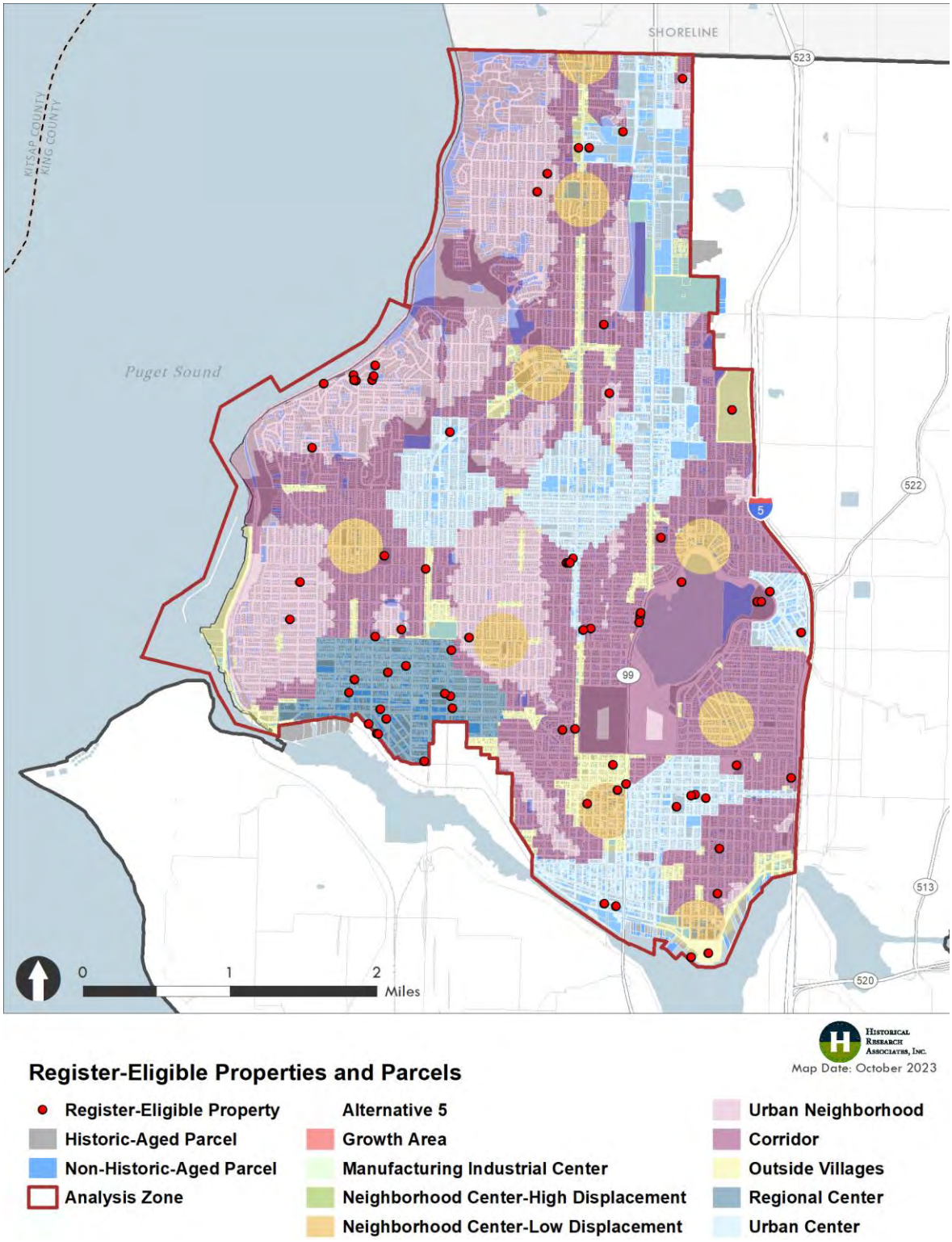
Architectural Resource Overview - Analysis Zone 1

- City of Seattle
- Analysis Zone
- National Register and Washington Heritage Register Property
- Washington Heritage Register Property
- National Register and Washington Heritage Register District
- Alternative 5
- Growth Area
- Manufacturing & Industrial Center
- Neighborhood Center-High Displacement
- Neighborhood Center-Low Displacement
- Urban Neighborhood
- Corridor
- Outside Villages
- Regional Center
- Urban Center

Note: Base map shown for the cultural maps is Alternative 5, as it was the most extensive amount of change studied in the Draft EIS and allowed for the maximum impact analysis.

Source: HRA, 2023.

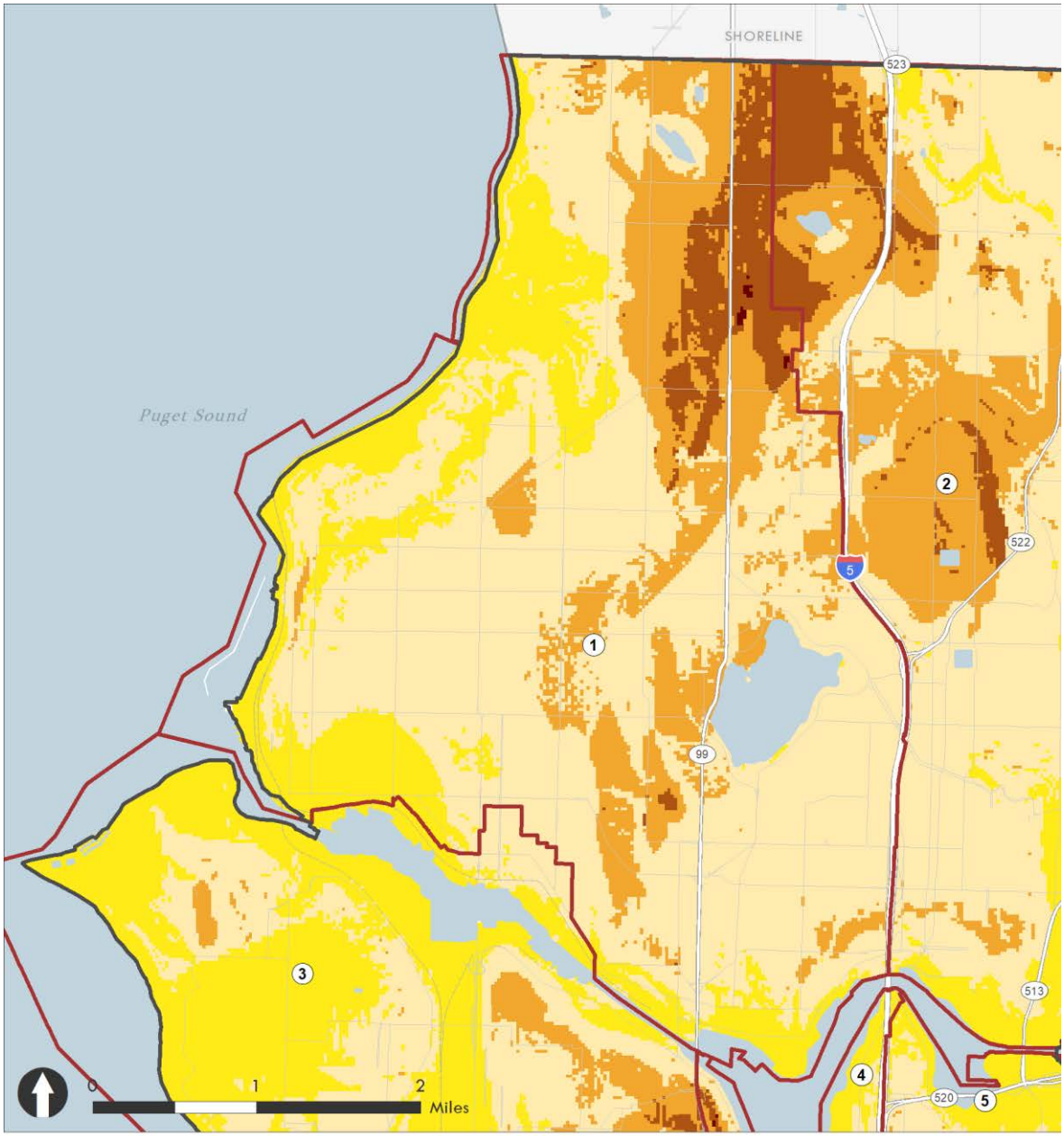
Exhibit 3.9-9. Area 1: NW Seattle—Historic-Aged Parcels and NRHP-Eligible Properties



Note: Base map shown for the cultural maps is Alternative 5, as it was the most extensive amount of change studied in the Draft EIS and allowed for the maximum impact analysis.

Source: HRA, 2023.

Exhibit 3.9-10. Area 1: NW Seattle—Map Showing Archaeological Sensitivity from DAHP Model



Source: HRA, 2023.

Area 2: NE Seattle

There are 1 Seattle Landmark District and 3 NRHP-listed historic districts found in the NE Seattle analysis area (**Exhibit 3.9-11**). There are 39 designated Seattle Landmarks in the NE Seattle area. Of these, 13 are education-related buildings, 11 are residential buildings, 3 are religious institutions, 3 are former libraries, 2 are commercial buildings, 2 are fire stations, 2 are bridges, 1 is a hangar, 1 is a street clock, and 1 is a science and technology conference center. These resources are significant under a variety of the six standards for designation (**Exhibit 3.9-12**).

Exhibit 3.9-11. Area 2: NE Seattle—SL-designated and NRHP-listed Districts

Property Name, Type	Register/List Date/Significance	Period of Significance
Ravenna-Cowen North Historic District	NRHP / 2018 / Criterion A for Community Planning and Development, and Criterion C for Architecture	1906–1969
Chittenden Locks and Lake Washington Ship Canal, Historic District	NRHP / 1978 / Criterion A for Commerce, Politics/Government, and Criterion C for Architecture, Engineering, and Landscape Architecture	1906–1917
Sand Point Naval Air Station Landmark District, Historic District	SL / 2011 / Criterion A for Military, Criterion C for Political, Criterion for Architecture, and Criterion F as a Distinctive Visual City Feature.	1926–1953
Naval Air Station (NAS) Seattle, Historic District	NRHP / 2010 / Criterion A for Military, and Criterion C for Architecture	1929–1945

Sources: DAHP, 2023.

There are 18 NRHP-listed resources and 9 WHR-listed resources within the NE Seattle analysis area. Of the 26 individually listed resources, 10 are collegiate buildings, 4 are residences, 2 are religious buildings, 2 are commercial buildings, 1 is a school, 1 is a site, 1 is an object, and 4 are bridges, which were listed in the NRHP under the *Historic Bridges and Tunnels in Washington State MPD,* and, finally, 1 is a Carnegie library, which was listed in the NRHP under the *Carnegie Libraries of Washington TR* (**Exhibit 3.9-13**).

Current King County Tax Assessor records show that within the NE Seattle area, there are 28,352 historic-period buildings. Of these, 26,690 are residential, including 26,057 residential buildings (single family dwellings, townhouses, duplexes, triplexes, and fourplexes), 554 apartment buildings, and 79 condominiums. The remaining 1,662 buildings are commercial, industrial, and governmental (**Exhibit 3.9-14**).

In contrast, DAHP records show 21,298 individual historic-period architectural resources have been entered on HPI forms within the NE Seattle area. Of these, only 140 were determined NRHP-eligible by DAHP or a federal agency and are plotted on the map (**Exhibit 3.9-14**). Many of the 21,298 HPI forms were created by data transfer for an Assessors Data Project for King County. The resources in these HPIs were not formally surveyed and recorded, have neither

eligibility recommendations nor determinations of eligibility, and the forms contain no survey data of any kind.

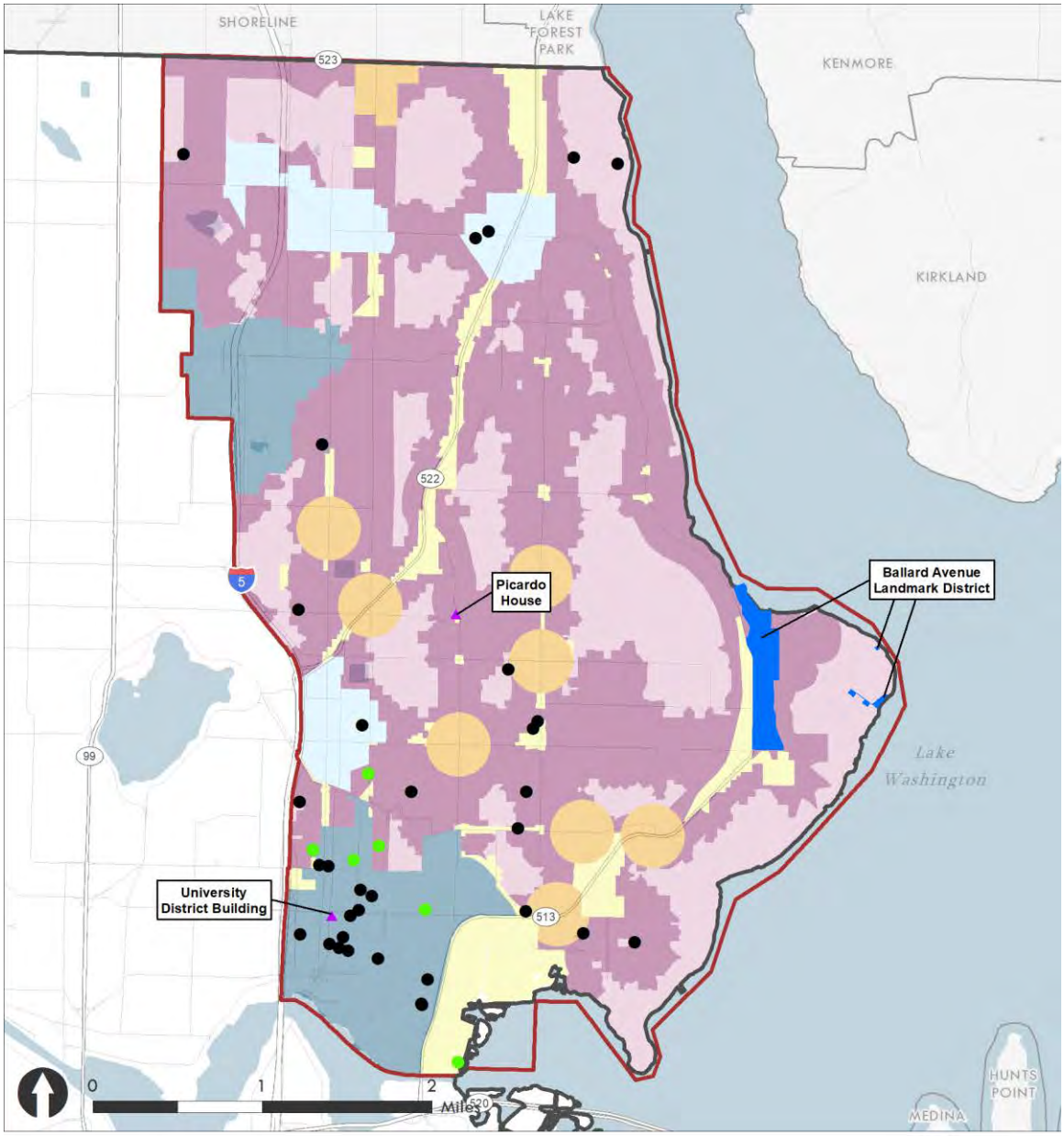
The discrepancy between the Assessor's and DAHP's records are likely in part due to demolitions that alter County Tax Assessor's records but do not change the records in DAHP's WISAARD database, and/or a lack of up-to-date survey and recordation of historic-period resources on HPI forms in WISAARD.

DAHP records show 42 cultural resources studies that included archaeological resources investigations that have been conducted within Analysis Zone 2 since 1995. Two precontact sites and nine historic-period sites have been recorded within Analysis Zone 2. Both precontact sites and one of the historic-period sites were determined not eligible for listing in the NRHP. The remaining historic-period sites have not been formally evaluated for listing in the NRHP. Most of the area within Analysis Zone 2 is considered of High or Very High Risk to contain precontact archaeological resources by DAHP's precontact archaeological site probability model, with areas of Very High Risk predominating along the shorelines and drainages. Areas of Moderately Low to Moderate Risk are located in scattered upland settings throughout the Analysis Zone 2, particularly within its northwestern portion (**Exhibit 3.9-15**).

Culturally Important Resources

There are 2 Hispanic Historic Sites (the Picardo House and the University District Building) within Analysis Zone 2 (**Exhibit 3.9-12**) (Source: the 2018 Latino Heritage Survey).

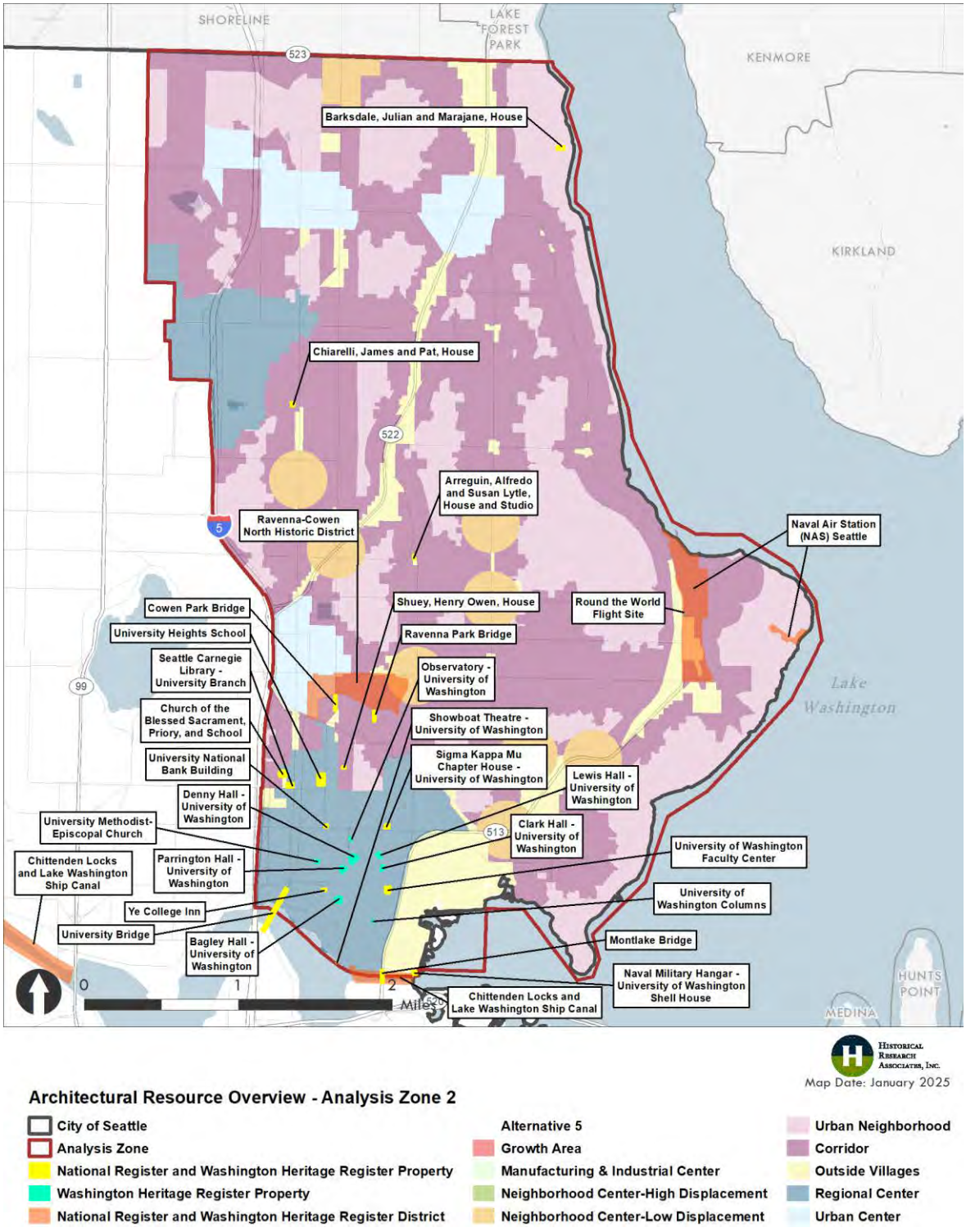
Exhibit 3.9-12. Area 2: NE Seattle—Designated Seattle Landmarks, Seattle Historic Districts, and Culturally Important Resources



Note: Base map shown for the cultural maps is Alternative 5, as it was the most extensive amount of change studied in the Draft EIS and allowed for the maximum impact analysis.

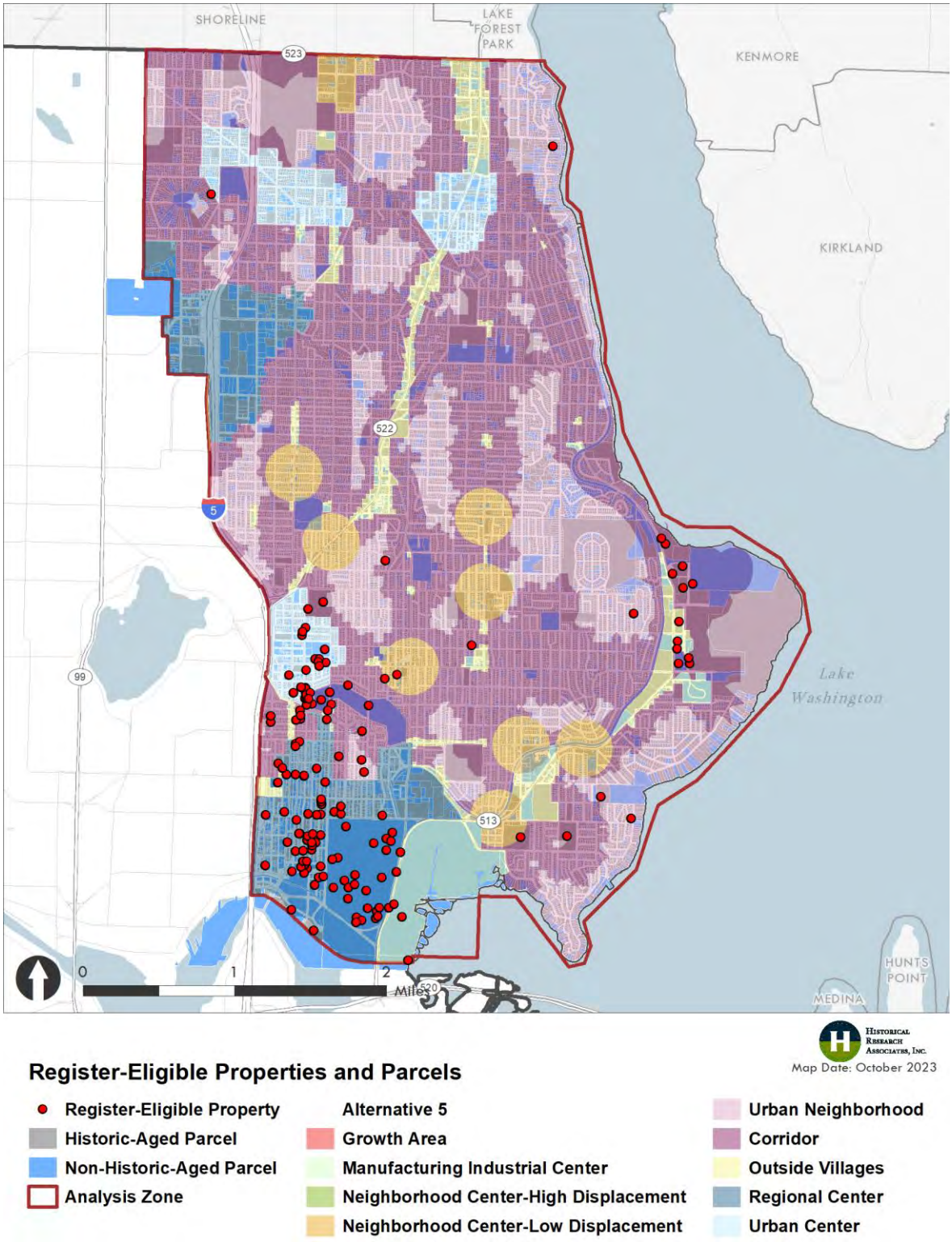
Source: HRA, 2023.

Exhibit 3.9-13. Area 2: NE Seattle—NRHP- and WHR-Listed Architectural Districts and Properties



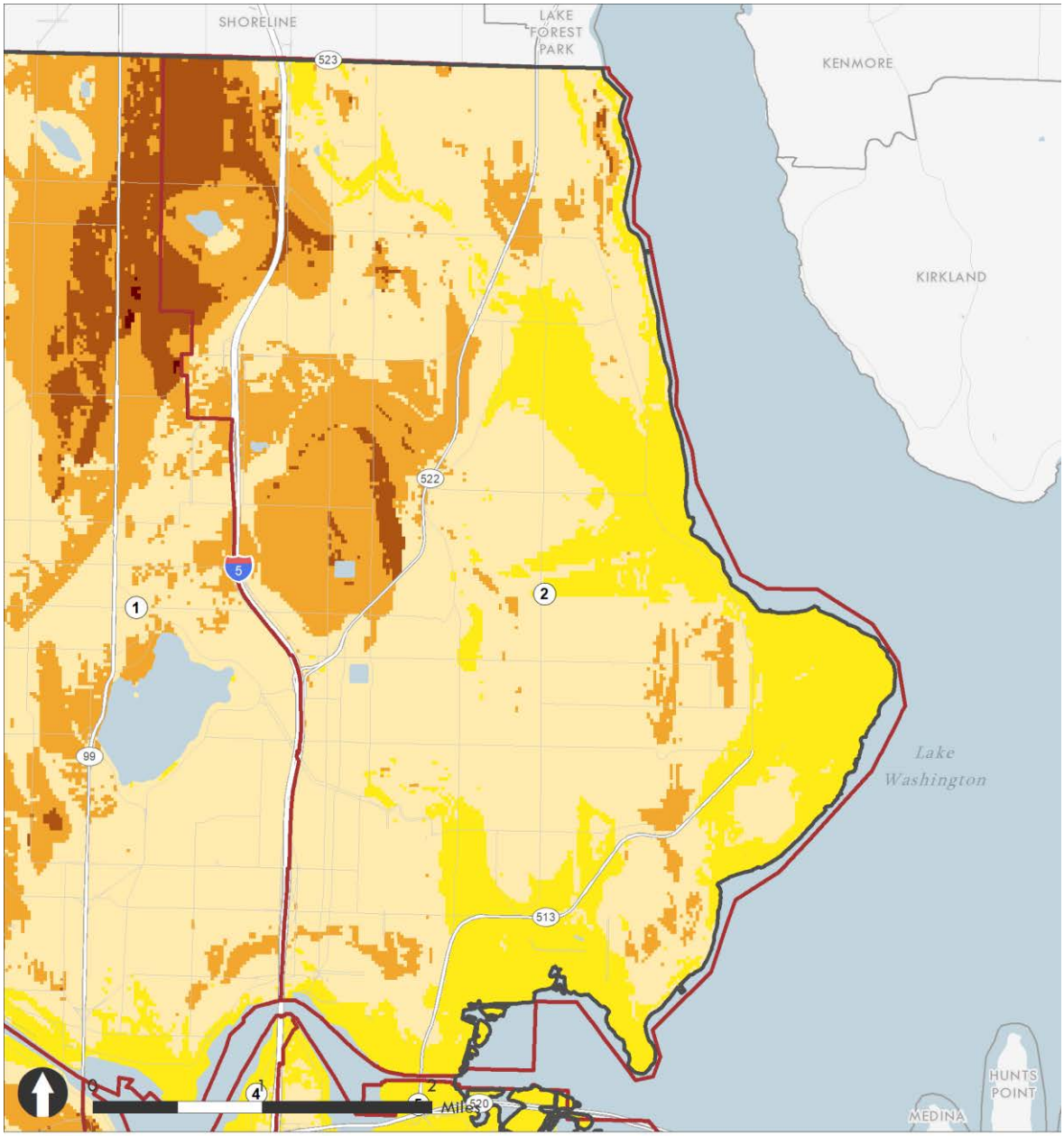
Notes: Map corrected since the Draft EIS. Nuclear Reactor Building at UW was listed in the National Register but it was demolished by UW in 2016. Base map shown for the cultural maps is Alternative 5, as it was the most extensive amount of change studied in the Draft EIS and allowed for the maximum impact analysis.
Source: HRA, 2024~~3~~.

Exhibit 3.9-14. Area 2: NE Seattle—Historic-Aged Parcels and NRHP-Eligible Resources



Note: Base map shown for the cultural maps is Alternative 5, as it was the most extensive amount of change studied in the Draft EIS and allowed for the maximum impact analysis.
Source: HRA, 2023.

Exhibit 3.9-15. Area 2: NE Seattle—Map Showing Archaeological Sensitivity from DAHP Model



Source: HRA, 2023.

130th/145th Station Area

There are 3 designated Seattle Landmarks in the 130th/145th Station Area. The first is Ingraham High School, which was designated in 2017. Built in 1958, the school is significant under Standard D, for its Mid-Century Modern style school architecture. The second is Lake City School, which was designated in 2009. The school was built in 1931 and is significant under Standard C for its association with the heritage of the community, Standard D for its Georgian style architecture, and under Standard F as a prominent feature of the neighborhood. Finally, the third Seattle Landmark within the 130th/145th Station Area is Lake City Library. Built in 1965, the library is significant under Standard D, for its Mid-Century Modern style architecture, and under Standard E as an outstanding work of the architect, John Morse (**Exhibit 3.9-16**). There are no NRHP- or WHR-listed historic districts or individually listed resources found in the 130th/145th Station Area.

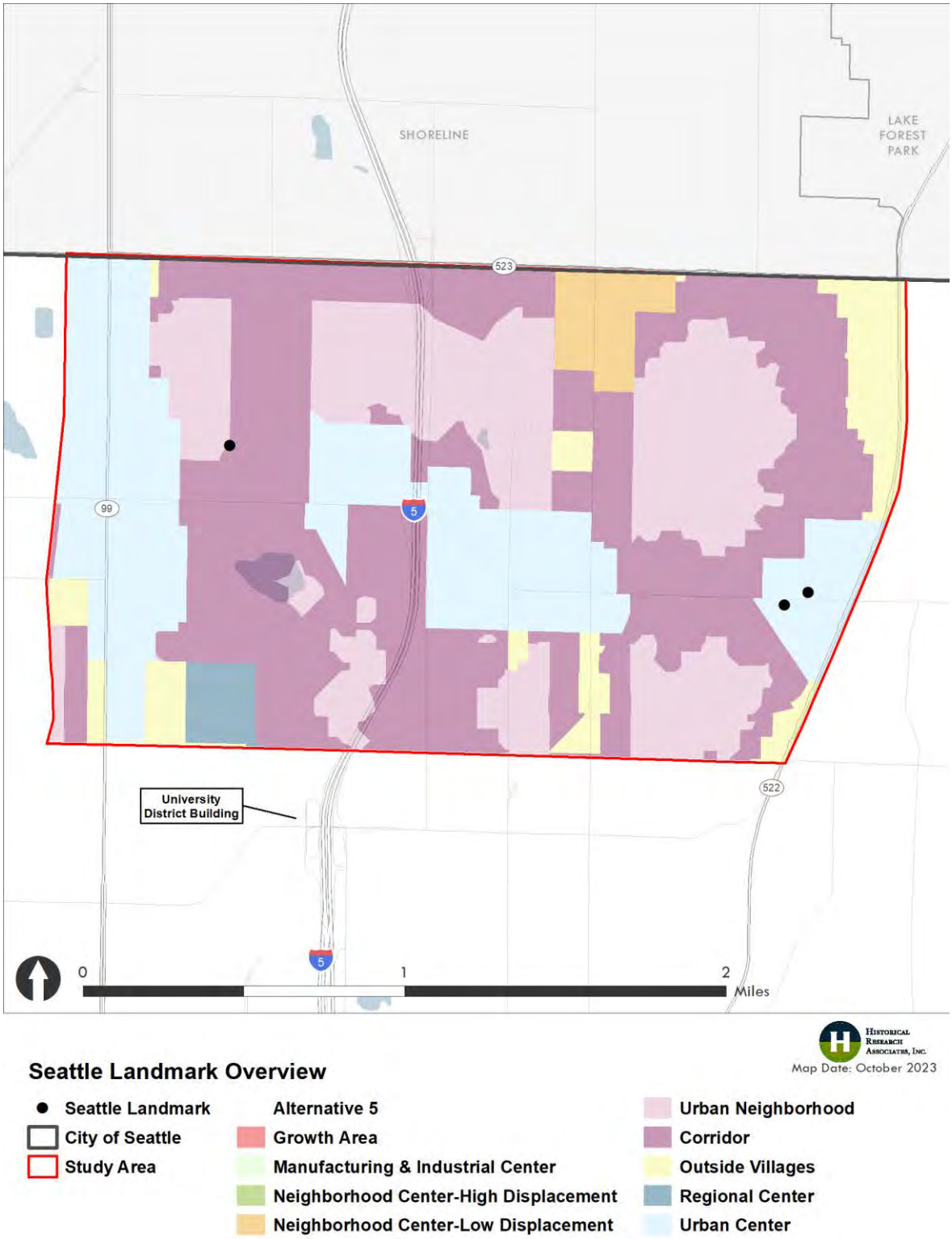
Current King County Tax Assessor records show that within the 130th/145th Station Areas, there are 5,260 historic-period buildings. Of these, 4,933 are residential, including 4,826 residential buildings (single family dwellings, townhouses, duplexes, triplexes, and fourplexes), 90 apartment buildings, and 17 condominiums. The remaining 327 buildings are commercial, industrial, and governmental (**Exhibit 3.9-17**).

In contrast, DAHP records show 3,789 individual historic-period architectural resources have been entered on HPI forms within the 130th/145th Station Areas. Of these, only 2 were determined NRHP-eligible by DAHP or a federal agency and are plotted on the map (**Exhibit 3.9-17**). Many of the 3,789 HPI forms were created by data transfer for an Assessors Data Project for King County. The resources in these HPIs were not formally surveyed and recorded, have neither eligibility recommendations nor determinations of eligibility, and the forms contain no survey data of any kind.

The discrepancy between the Assessor's and DAHP's records are likely in part due to demolitions that alter County Tax Assessor's records but do not change the records in DAHP's WISAARD database, and/or a lack of up-to-date survey and recordation of historic-period resources on HPI forms in WISAARD.

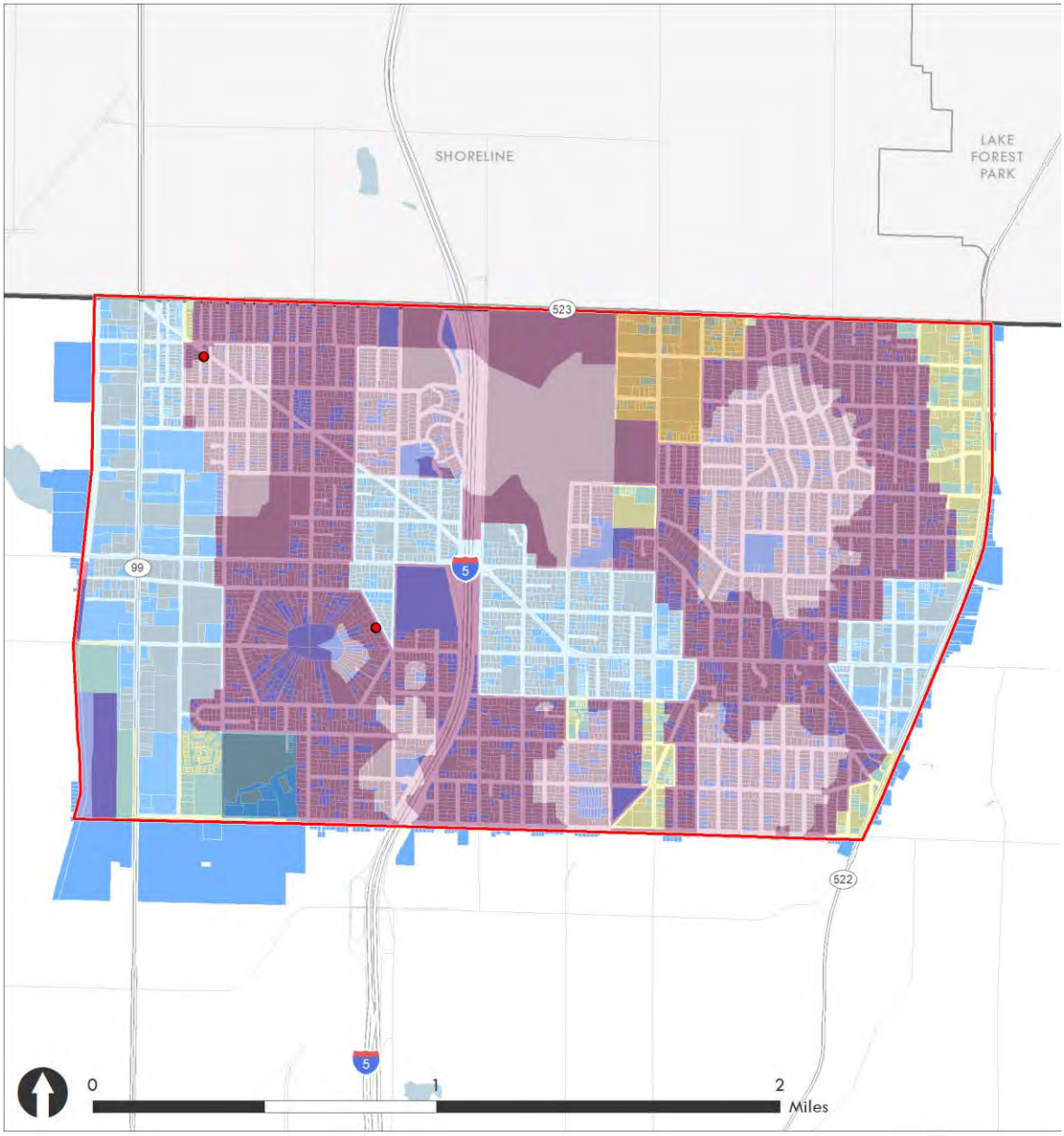
DAHP records show seven cultural resources studies that included archaeological resources investigations have been conducted within the 130th/145th Station Area since 1995. One historic-period site has been recorded within the 130th/145th Station Area. The site has not been formally evaluated for listing in the NRHP. Most of the eastern half of the 130th/145th Station Area is considered High to Very High Risk to contain precontact archaeological resources by DAHP's precontact archaeological site probability model. Areas of Moderately Low to Moderate Risk are primarily located in hilly upland settings across the western half of the 130th/145th Station Area (**Exhibit 3.9-18**).

Exhibit 3.9-16. Area 2: NE Seattle—Designated Seattle Landmarks



Note: Base map shown for the cultural maps is Alternative 5, as it was the most extensive amount of change studied in the Draft EIS and allowed for the maximum impact analysis.
Source: HRA, 2023.

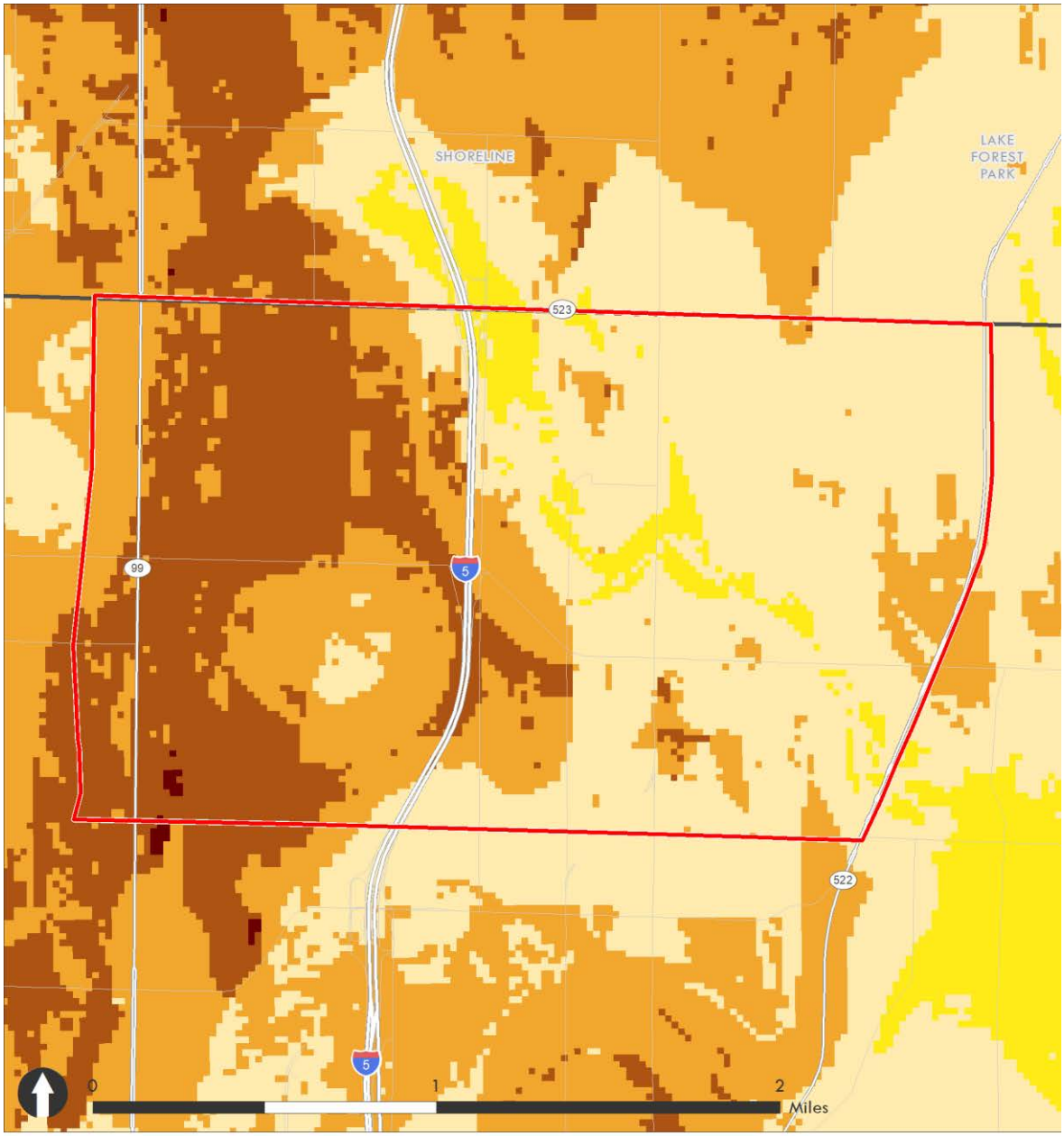
Exhibit 3.9-17. Area 2: NE Seattle—Historic-Aged Parcels and NRHP-Eligible Resources



Note: Base map shown for the cultural maps is Alternative 5, as it was the most extensive amount of change studied in the Draft EIS and allowed for the maximum impact analysis.

Source: HRA, 2023.

Exhibit 3.9-18. Area 2: NE Seattle—Map Showing Archaeological Sensitivity from DAHP Model



Source: HRA, 2023.

Area 3: Queen Anne/Magnolia

There are 1 Seattle Landmark District and 3 NRHP-listed historic districts found in the Queen Anne/Magnolia analysis area. These resources are listed in the table below (**Exhibit 3.9-19**).

There are 59 designated Seattle Landmarks in the Queen Anne/Magnolia area. Of these, 25 are residential buildings, 5 are transportation-related, 4 are education-related buildings, 4 are commercial buildings, 3 are religious institutions, 2 are electrical power-related resources, 2 are former libraries, 2 are telephone-related buildings, 2 resources are Seattle World's fair-related, 2 are parks/gardens, 2 are bridges, 1 is a fire station, 1 is sports arena, 1 is a mural, 1 is a bell, 1 is a retaining wall, and 1 is a space needle. These resources are significant under a variety of the six standards for designation (**Exhibit 3.9-20**).

Exhibit 3.9-19. Area 3: Queen Anne/Magnolia—SL-designated and NRHP-listed Districts

Property Name, Type	Register/List Date/Significance	Period of Significance
Fort Lawton Landmark District, Historic District	SL / 1988 / Criterion A for Development of the City, Criterion C for Military, Criterion D for Architecture and Landscape	1898–1945
Fort Lawton, Historic District	NRHP / 1978, updated in 2008 / Criterion A for Military, and Criterion C for Architecture	1899–1945
Chittenden Locks and Lake Washington Ship Canal, Historic District	NRHP / 1978 / Criterion A for Commerce, Politics/Government, and Criterion C for Architecture, Engineering, and Landscape Architecture	1906–1917

Sources: DAHP, 2023.

There are 19 NRHP-listed resources and 4 WHR-listed resources within the Queen Anne/Magnolia area. Of the 23 individually listed resources, 6 are residential, 3 are commercial buildings, two are schools, 1 is a light station, 1 is an object, 1 is a Post Office, 1 is a library, 1 is a coliseum, 1 is a collegiate building, and 5 are bridges, which were listed in the NRHP under the *Historic Bridges and Tunnels in Washington State MPD,* and, finally, 1 is a Carnegie library, which was listed in the NRHP under the *Carnegie Libraries of Washington TR* (**Exhibit 3.9-21**).

Current King County Tax Assessor records show that within the Queen Anne/Magnolia area, there are 12,546 historic-period buildings. Of these, 11,083 are residential, including 10,285 residential buildings (single family dwellings, townhouses, duplexes, triplexes, and fourplexes), 622 apartment buildings, and 176 condominiums. The remaining 1,463 buildings are commercial, industrial, and governmental (**Exhibit 3.9-22**).

In contrast, DAHP records show 9,588 individual historic-period architectural resources have been entered on HPI forms within the Queen Anne/Magnolia area. Of these, only 120 were determined NRHP-eligible by DAHP or a federal agency and are plotted on the map (**Exhibit 3.9-22**). Most of the 9,588 HPI forms were created by data transfer for an Assessors Data Project for King County. The resources in these HPIs were not formally surveyed and recorded, have

neither eligibility recommendations nor determinations of eligibility, and the forms contain no survey data of any kind.

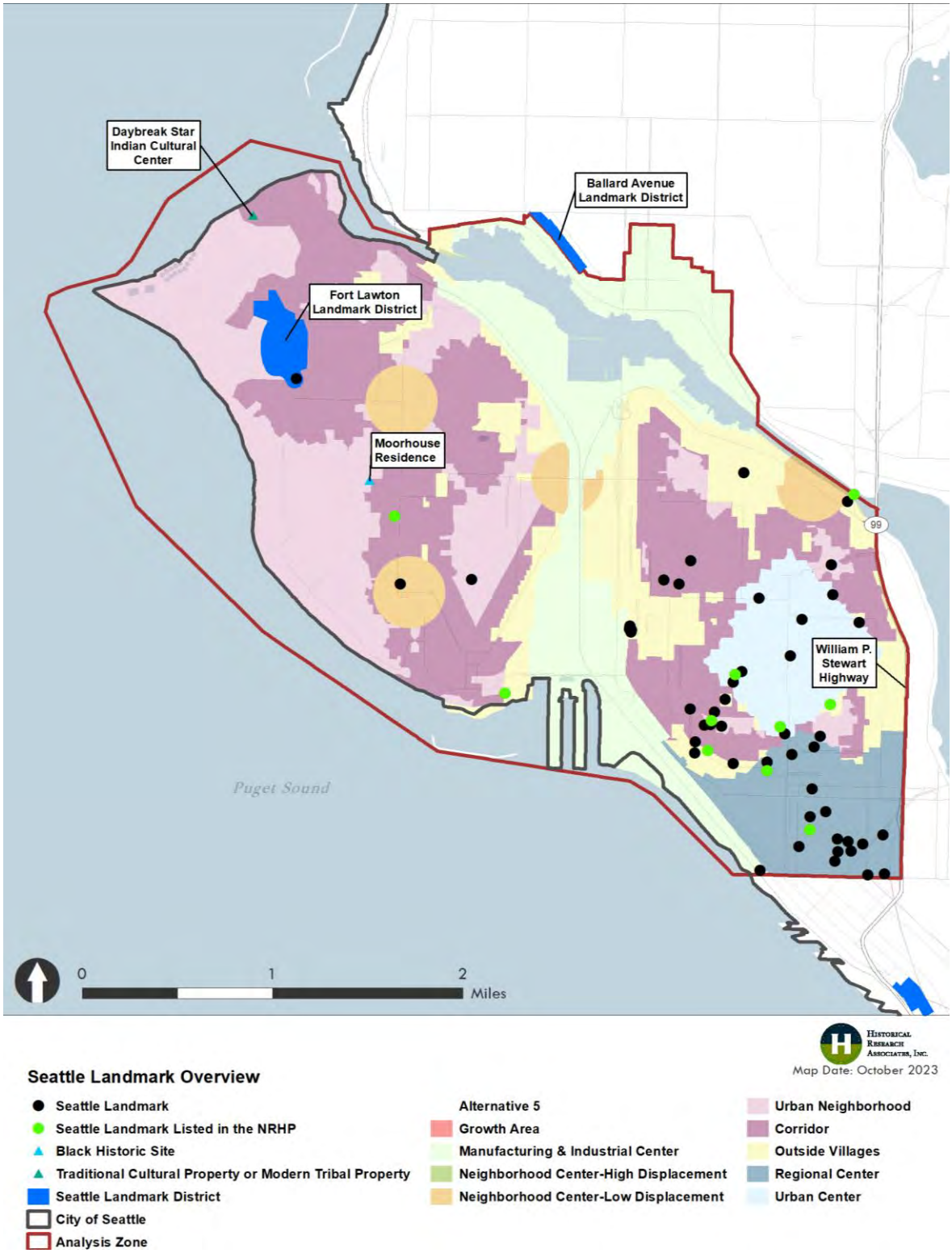
The discrepancy between the Assessor's and DAHP's records are likely in part due to demolitions that alter County Tax Assessor's records but do not change the records in DAHP's WISAARD database, and/or a lack of up-to-date survey and recordation of historic-period resources on HPI forms in WISAARD.

DAHP records show 43 cultural resources studies that included archaeological resources investigations that have been conducted within Analysis Zone 3 since 1995. Three precontact sites, ten historic-period sites, and one multicomponent site have been recorded within Analysis Zone 3. One of the precontact sites was determined eligible for listing in the NRHP, three of the historic-period sites were determined not eligible for listing in the NRHP, and the remaining ten sites have not been formally evaluated for listing in the NRHP. Most of the area within Analysis Zone 3 is considered of High or Very High Risk to contain precontact archaeological resources by DAHP's precontact archaeological site probability model. Areas of Moderately Low to Moderate Risk are located in a small upland portion of the Magnolia neighborhood and across much of the hilly Queen Anne neighborhood (**Exhibit 3.9-23**).

Culturally Important Resources

There are 1 Black Historic Site (Moorhouse Residence) and 1 Potential Black Commemorative Site (William P. Stewart Highway), within Analysis Zone 3 (**Exhibit 3.9-20**) (Source: the Washington State Black Historic Sites Survey).

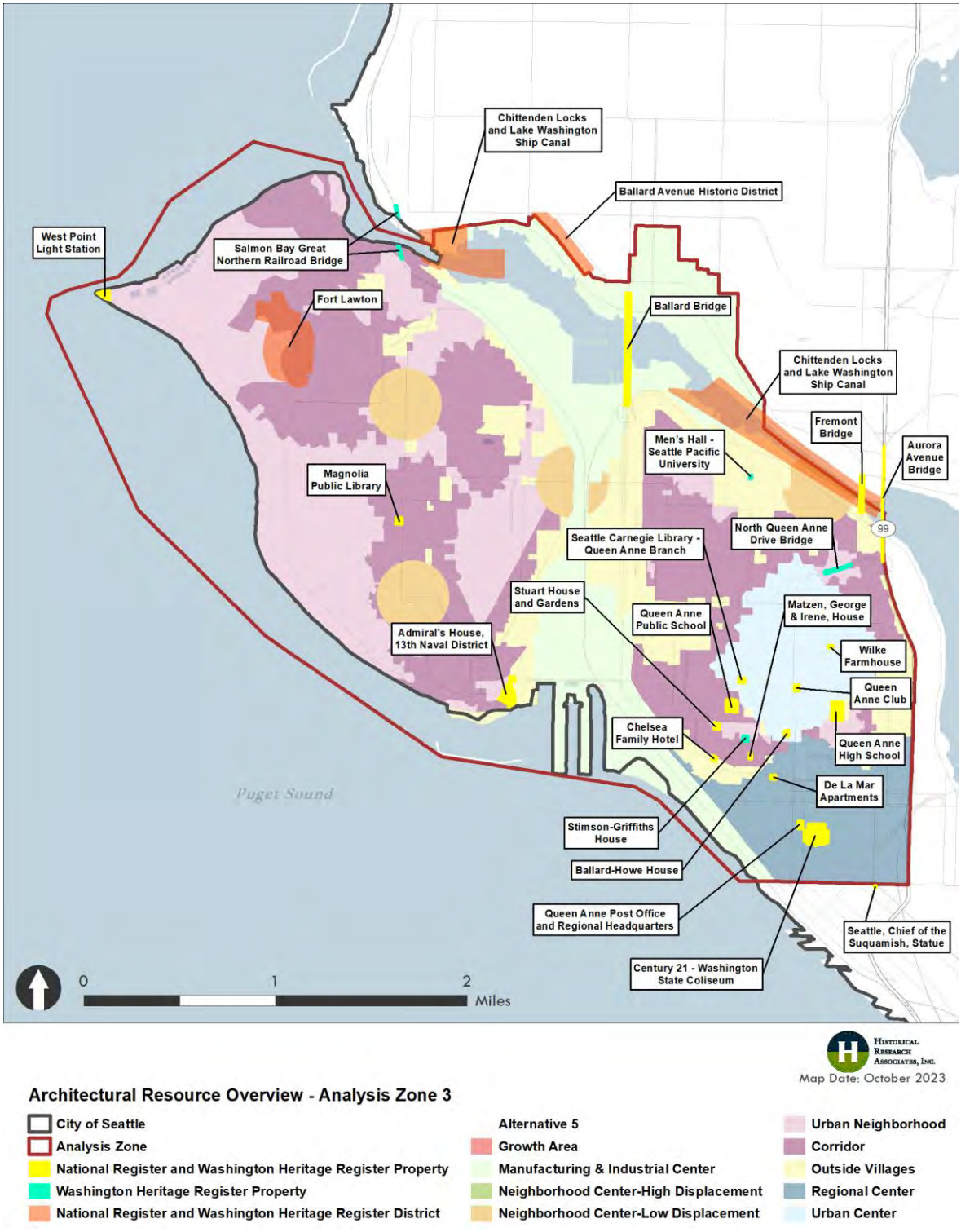
Exhibit 3.9-20. Area 3: Queen Anne/Magnolia—Designated Seattle Landmarks, Seattle Historic Districts, and Culturally Important Resources



Note: Base map shown for the cultural maps is Alternative 5, as it was the most extensive amount of change studied in the Draft EIS and allowed for the maximum impact analysis.

Source: HRA, 2023.

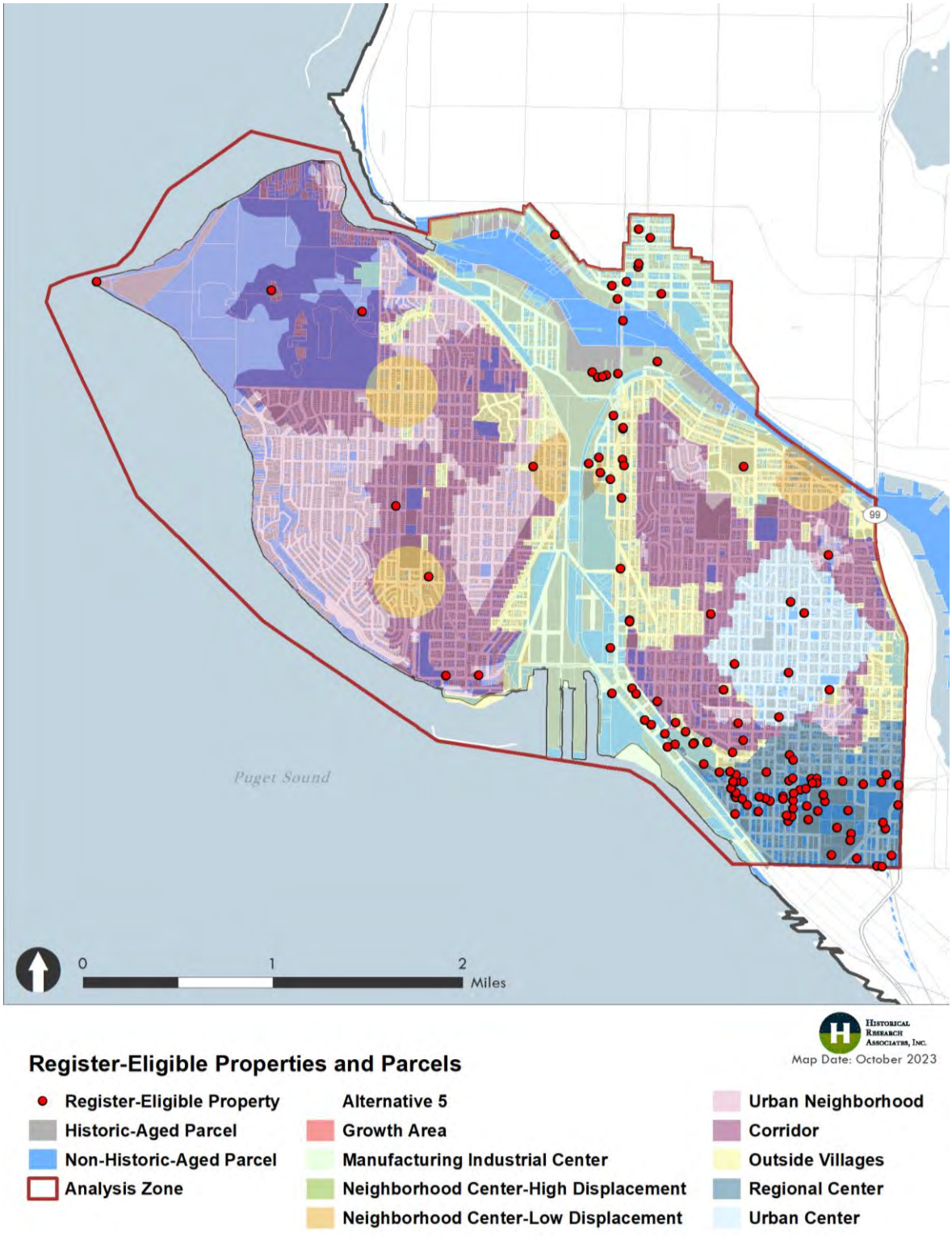
Exhibit 3.9-21. Area 3: Queen Anne/Magnolia—NRHP- and WHR-Listed Architectural Districts and Properties



Note: Base map shown for the cultural maps is Alternative 5, as it was the most extensive amount of change studied in the Draft EIS and allowed for the maximum impact analysis.

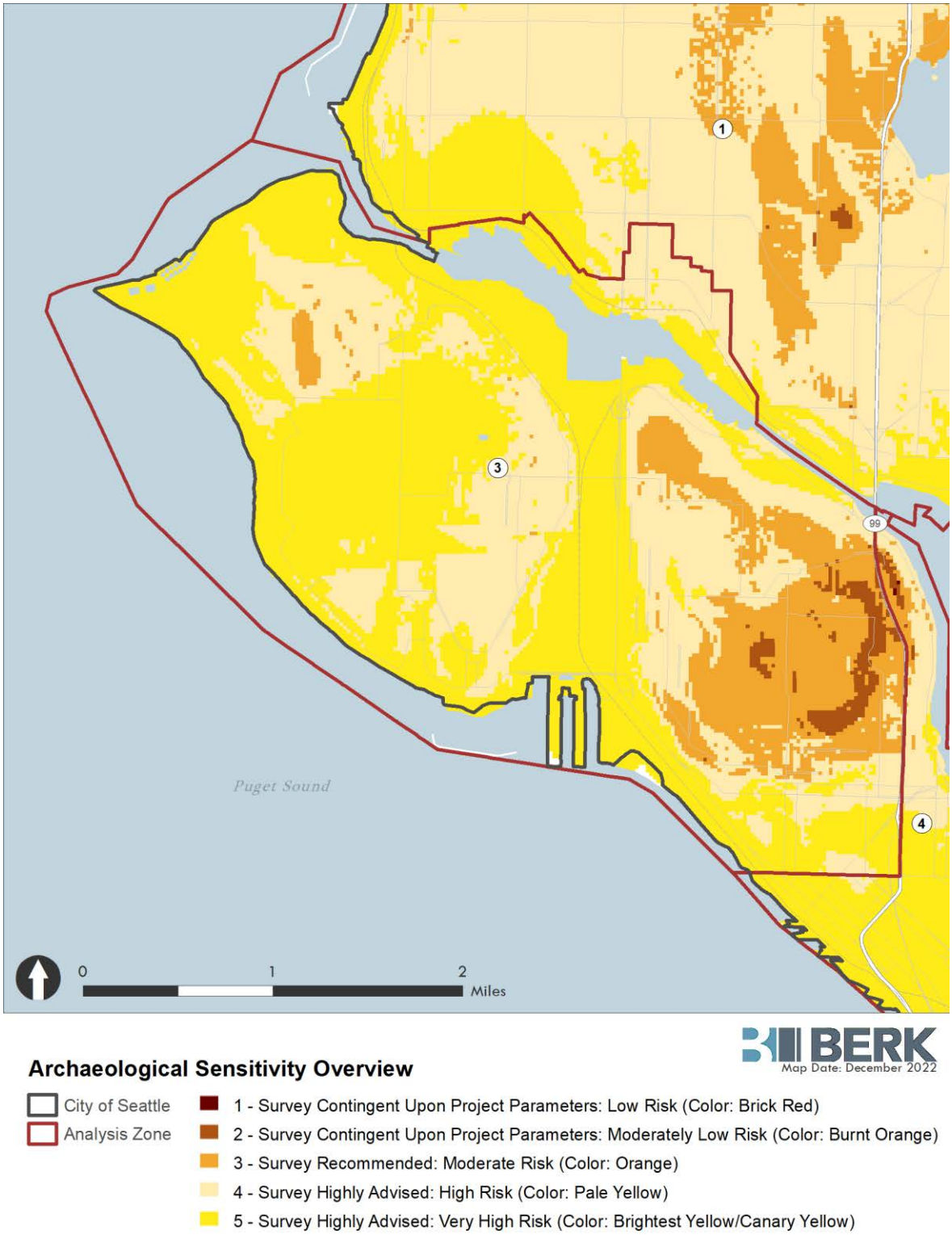
Source: HRA, 2023.

Exhibit 3.9-22. Area 3: Queen Anne/Magnolia—Historic-Aged Parcels and NRHP-Eligible Resources



Note: Base map shown for the cultural maps is Alternative 5, as it was the most extensive amount of change studied in the Draft EIS and allowed for the maximum impact analysis.
Source: HRA, 2023.

Exhibit 3.9-23. Area 3: Queen Anne/Magnolia—Map Showing Archaeological Sensitivity from DAHP Model



Source: HRA, 2023.

Area 4: Downtown/Lake Union

There are a very large number of historic properties and districts in the Downtown/Lake Union Area. Found in the Downtown/Lake Union analysis area are 3 Seattle Landmark Districts, 3 NRHP-listed historic districts, 1 WHR-listed historic district, and notably, there are 6 National Historic Landmarks, which are also listed in the NRHP. These resources (districts and NHLs) are listed in the table below (**Exhibit 3.9-24**).

There are 155 designated Seattle Landmarks in the Downtown/Lake Union area. Of these, 15 are residential buildings, 15 are transportation-related, 2 are education-related buildings, 77 are commercial buildings, 12 are hotels, 8 are maritime-related, 6 are fraternal organization/club buildings, 5 are street clocks, 3 are religious institutions, 2 are power-related resources, 3 are theater buildings, 2 are fire station buildings, 2 are memorial sculptures, 1 is a Naval armory, and 1 is a YMCA. These resources are significant under a variety of the six standards for designation (**Exhibit 3.9-25**).

Exhibit 3.9-24. Area 4: Downtown/Lake Union—SL-designated and NHL-listed Districts, and NHL-listed Properties

Property Name, Type	Register/List Date/Significance	Period of Significance
Pioneer Square Preservation District, District	SL / 1970 / Criterion A for the Development of Seattle, Criterion C for the Economic Heritage of Seattle, Puget Sound, and Washington, Criterion D for Architecture	1889–1931
Pioneer Square-Skid Road Historic District, (Including Boundary Increases), District	NRHP / 2008 / Criterion A for Community Planning and Development, Industry, Commerce, Transportation, Politics/Government, and Social History, and Criterion C for Architecture, Landscape Architecture, and Engineering	1889–1931
Pike Place Market Historical District, District	SL / 1971 / Criterion A for Development of Seattle, Criterion C for Cultural and Economic Heritage, Criterion D for Architecture, and Criterion F as a Distinctive Neighborhood Feature	1907–1971
Pike Place Public Market Historic District, District	NRHP / 2011 / Criterion A for Agriculture, Commerce, Politics/Government, and Ethnic Heritage, and Criterion C for Architecture	1907–1971
International Special Review District (ISRD), District	SL / 1973 / Criterion A for Development of Seattle, Criterion C for Economic Heritage of the Community and Culture, and Criterion D for Architecture	1910
Seattle Chinatown Historic District, District	NRHP / 1986 / Criterion A for Commerce, Social/Humanitarian, and Ethnic History	1907–1936
Tenas Chuck Houseboat Moorage Historic District, District	WHR / 2000 / Criterion A for Early Settlement and Community, and Criterion C for Land Use and Architecture/Engineering	1910–1965
Pioneer Building, Pergola, and Totem Pole—Seattle, District	NHL / 1977 / Criterion 1 for Social History, and Criterion 4 for Architecture	1875–1899, 1900–1924

Property Name, Type	Register/List Date/Significance	Period of Significance
Schooner *Adventuress,* Structure	NHL / 1989 / NHL Criterion 1 for Maritime History, and Criterion 4 for Naval Architecture	1914
Virginia V, Structure	NHL / 1992 / Criterion 1 for Maritime Transportation, and Criterion 4 for Architecture	1922–1944
Relief (Lightship), Structure	NHL / 1989 / Criterion 1 for Maritime Transportation, and Criterion 4 for Naval Architecture, Lightship	1905–1960
Duwamish, Structure	NHL / 1989 / Criterion 1 for Maritime Business, Shipping and Transportation, and Criterion 4 for Naval Architecture	1909–1949
Panama Hotel, Building	NHL / 2006 / Criterion 1 for Ethnic Heritage: Asian, and Criterion 4 for Architecture	1910–1942

Sources: DAHP, 2023.

There are 80 NRHP-listed resources and 20 WHR-listed resources within the Downtown/Lake Union area (for more information see the WISAARD map with the "Register Public" layer turned on, at https://wisaard.dahp.wa.gov/Map). As adding these resources to the table would create a table that spans a number of pages, they will be only briefly mentioned here. Of the 80 NRHP-listed resources, 30 are commercial buildings, 13 are hotels, 8 are ships/boats, 5 are apartment buildings, 5 are federal government-related buildings, 3 are transportation-related, 3 are churches, 3 are club facilities, 2 are theaters, 2 are art objects, 1 is a stables, 1 is a park, 1 is a YWCA, and 3 are bridges, which were listed in the NRHP under the *Historic Bridges and Tunnels in Washington State MPD*. Of the 20 WHR-listed resources, 15 are historic sites, 2 are ships, 1 is a school, 1 is a commercial block, and 1 is a park (**Exhibit 3.9-26**).

Current King County Tax Assessor records show that within the Downtown/Lake Union area, there are 1,711 historic-period buildings. Of these, 599 are residential, including 246 residential buildings (single family dwellings, townhouses, duplexes, triplexes, and fourplexes), 260 apartment buildings, and 93 condominiums. The remaining 1,112 buildings are commercial, industrial, and governmental (**Exhibit 3.9-27**).

In contrast, DAHP records show 1,853 individual historic-period architectural resources have been entered on HPI forms within the Downtown/Lake Union area. Of these, only 278 were determined NRHP-eligible by DAHP or a federal agency and are plotted on the map (**Exhibit 3.9-27**). Many of the 1,853 HPI forms were created by data transfer for an Assessors Data Project for King County. The resources in these HPIs were not formally surveyed and recorded, have neither eligibility recommendations nor determinations of eligibility, and the forms contain no survey data of any kind.

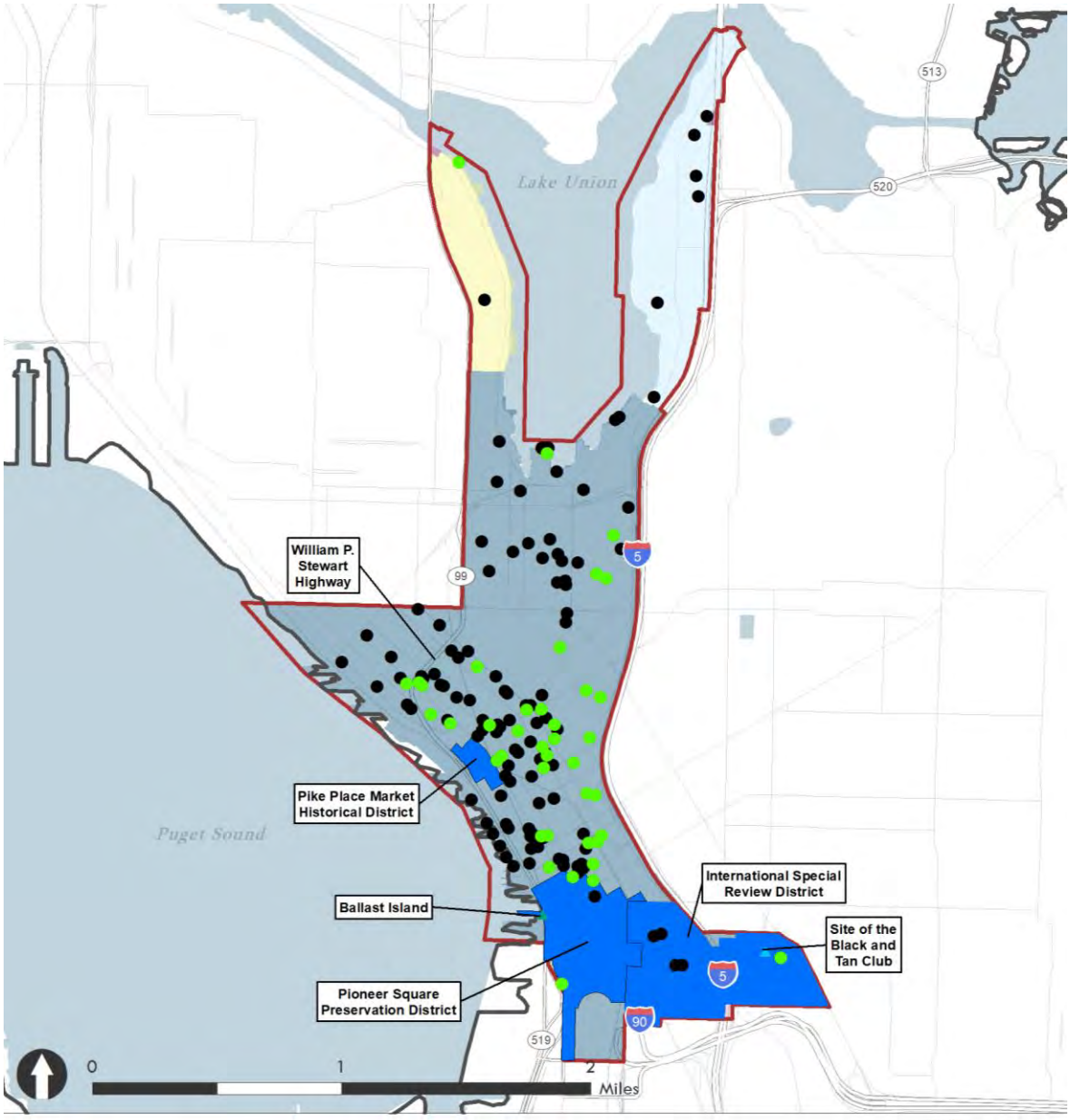
The discrepancy between the Assessor's and DAHP's records are likely in part due to demolitions that alter County Tax Assessor's records but do not change the records in DAHP's WISAARD database, and/or a lack of up-to-date survey and recordation of historic-period resources on HPI forms in WISAARD.

DAHP records show 81 cultural resources studies that included archaeological resources investigations that have been conducted within Analysis Zone 4 since 1995. Thirty-four historic-period sites and two multicomponent sites have been recorded within Analysis Zone 4. two of the historic-period sites are listed in the NRHP, two historic-period sites were determined eligible for listing in the NRHP, ten historic-period sites were determined not eligible for listing in the NRHP, and the remaining twenty-one sites have not been formally evaluated for listing in the NRHP. One of the NRHP-listed historic-period sites, Ballast Island, is a TCP (45KI1189) (Curti, et al. 2020). Nearly all of Analysis Zone 4 is considered of High or Very High Risk to contain precontact archaeological resources by DAHP's precontact archaeological site probability model. Small areas of Moderate Risk are located along I-5 east of the South Lake Union neighborhood (**Exhibit 3.9-28**).

Culturally Important Resources

There are 1 Black Historic Site (the site of the Black and Tan Club) and 1 Potential Black Commemorative Site (the William P. Stewart Highway), in Analysis Zone 4 (**Exhibit 3.9-25**) (Source: the Washington State Black Historic Sites Survey).

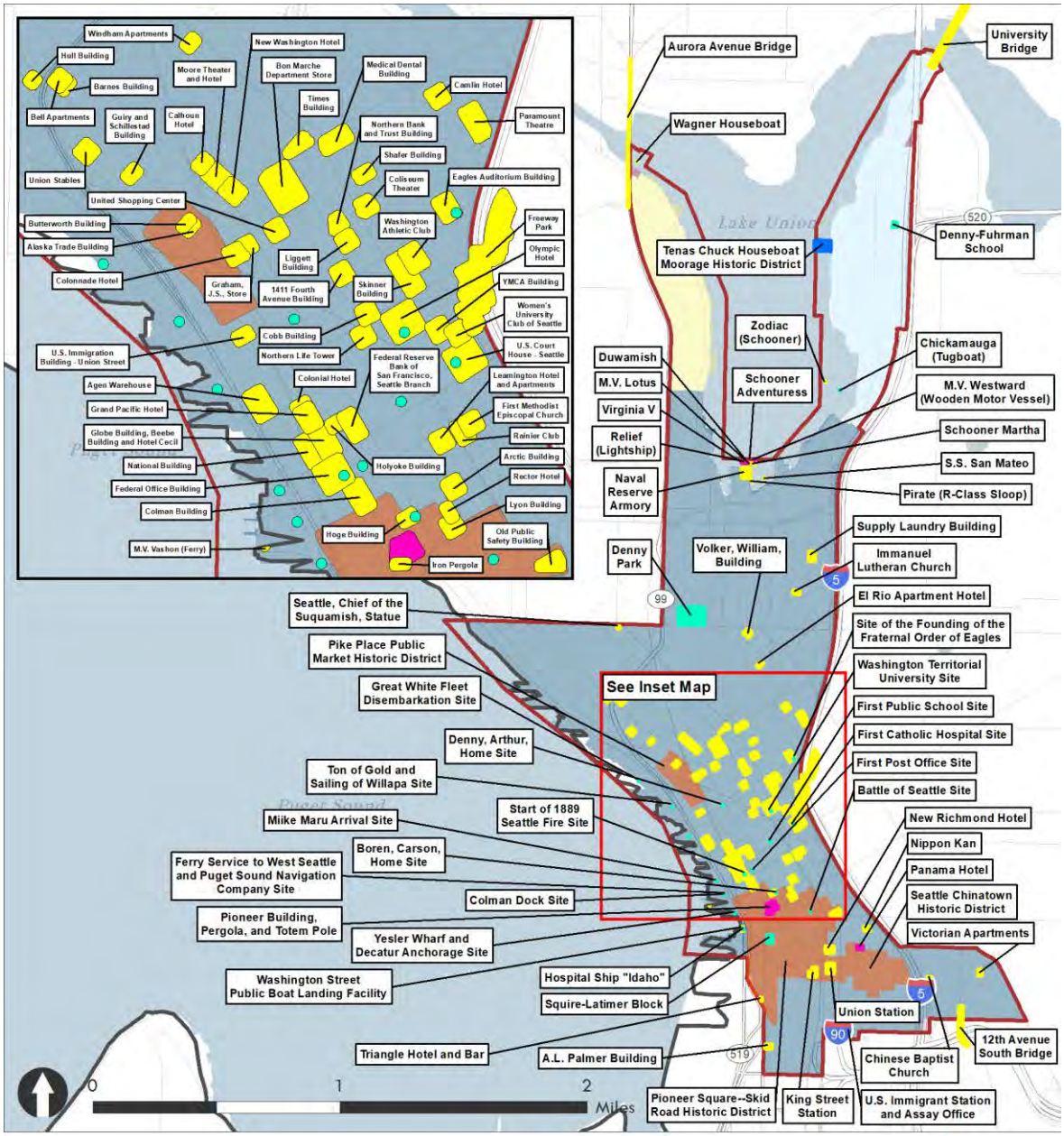
Exhibit 3.9-25. Area 4: Downtown/Lake Union—Designated Seattle Landmarks, Seattle Historic Districts, and Culturally Important Resources



Note: Base map shown for the cultural maps is Alternative 5, as it was the most extensive amount of change studied in the Draft EIS and allowed for the maximum impact analysis.

Source: HRA, 2023.

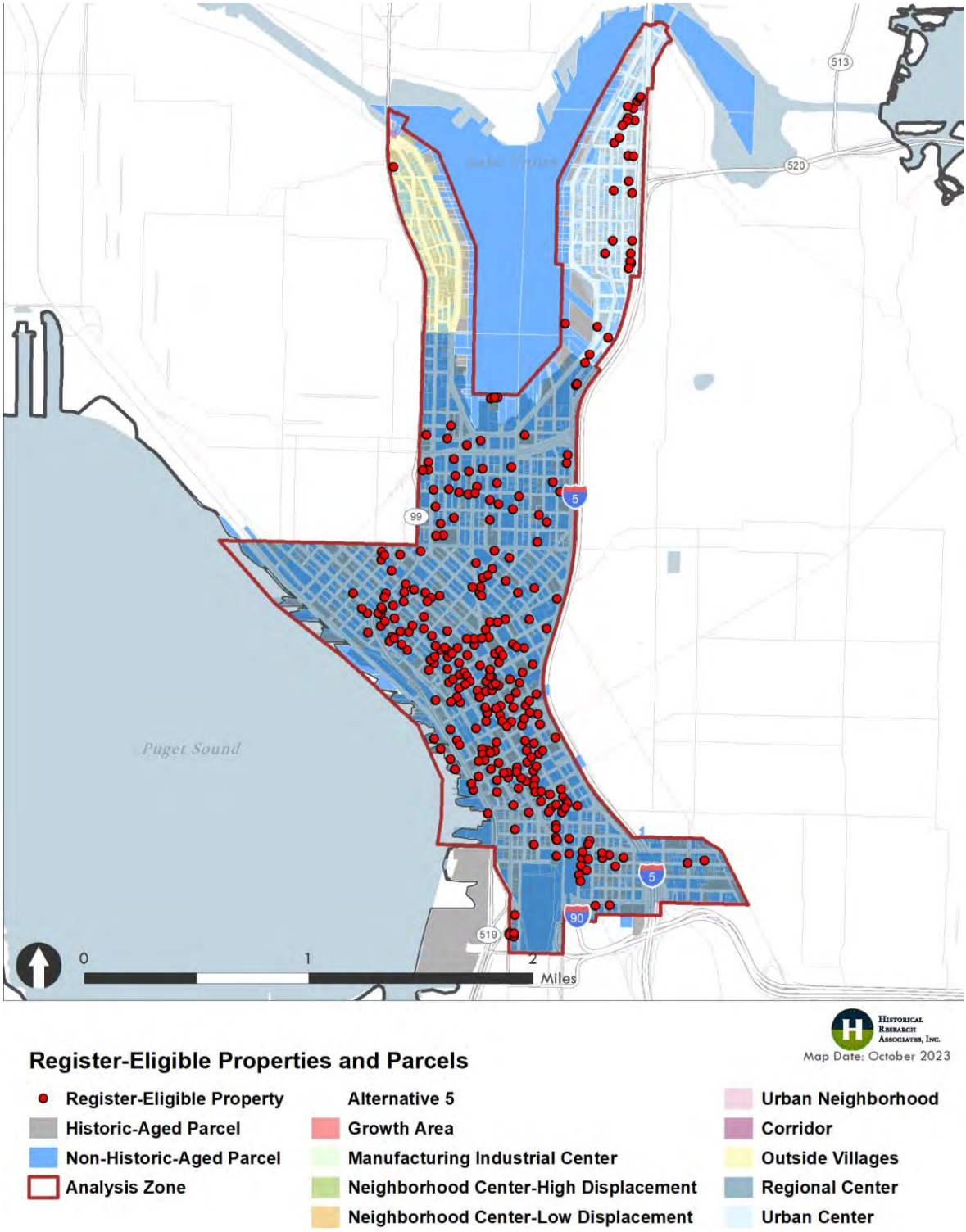
Exhibit 3.9-26. Area 4: Downtown/Lake Union—NHL-, NRHP- and WHR-Listed Architectural Properties and Districts



Note: Base map shown for the cultural maps is Alternative 5, as it was the most extensive amount of change studied in the Draft EIS and allowed for the maximum impact analysis.

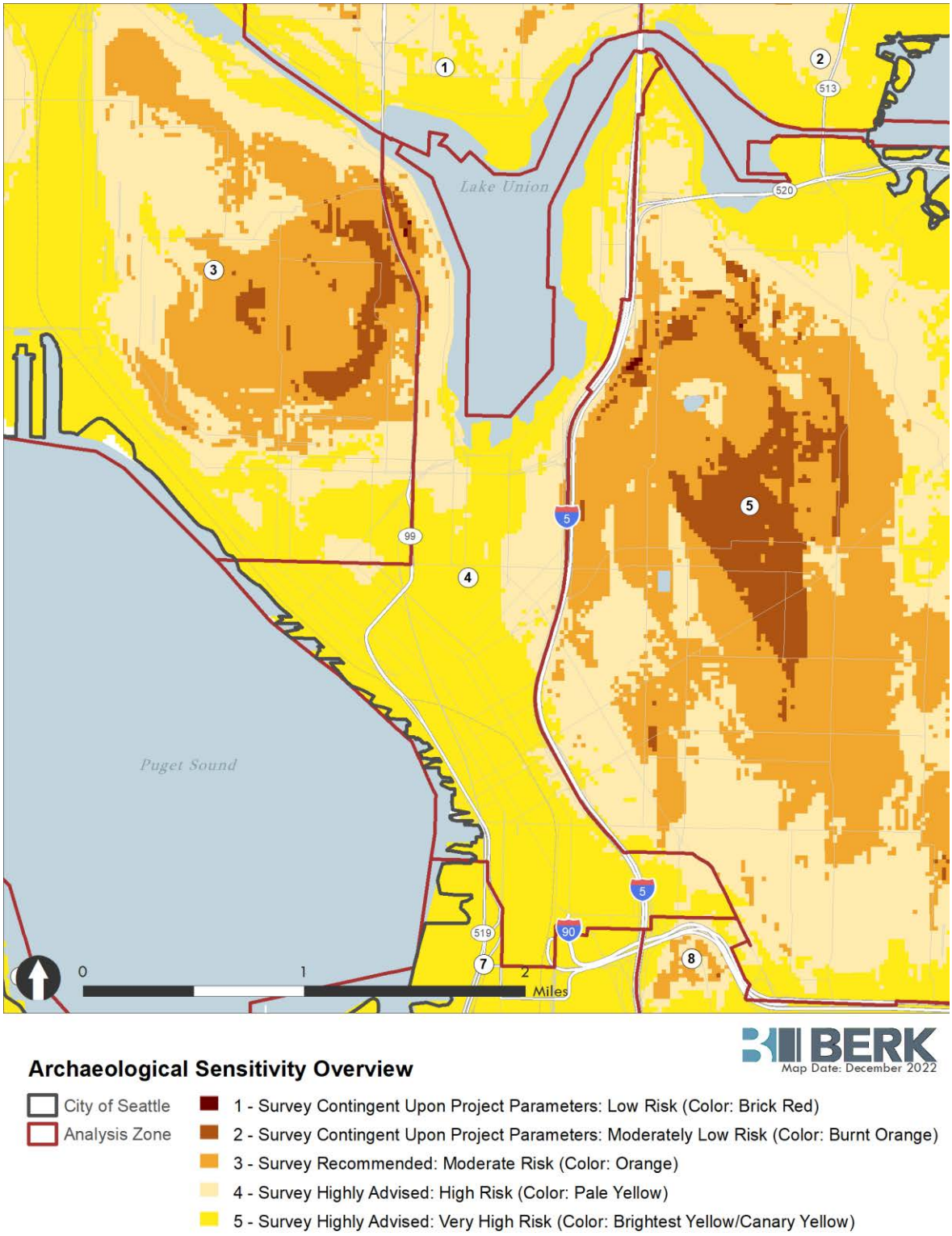
Source: HRA, 2023.

Exhibit 3.9-27. Area 4: Downtown/Lake Union—Historic-Aged Parcels and NRHP-Eligible Resources



Note: Base map shown for the cultural maps is Alternative 5, as it was the most extensive amount of change studied in the Draft EIS and allowed for the maximum impact analysis.
Source: HRA, 2023.

Exhibit 3.9-28. Area 4: Downtown/Lake Union—Map Showing Archaeological Sensitivity from DAHP Model



Source: HRA, 2023.

Area 5: Capitol Hill/Central District

There are 1 Seattle Landmark district, 7 NRHP-listed historic districts, and 1 WHR-listed historic district located in the Capitol Hill/Central District analysis area. These resources are listed in the table below (**Exhibit 3.9-29**).

There are a large number of historic properties in the Capitol Hill/Central District. Adding these resources to the table would create a table that spans a number of pages, so they will be only briefly mentioned here. There are 117 designated Seattle Landmarks in the Capitol Hill/Central District area. Of these, 33 are residential buildings, 17 are religious institutions, 16 are Volunteer Park resources, 14 are apartment buildings, 9 are education-related buildings, 7 are clubs/community-related resources, 4 are fire stations, 3 are transportation-related buildings, 2 are medical buildings, 2 are hotels, 1 is a manufacturing building, 1 is a library, 1 is a garden, 1 is a bottling plant, 1 is a substation, 1 is a steam plant, 1 is a reservoir, 1 is a bike path, 1 is a bridge, and 1 is a stairway. These resources are significant under a variety of the six standards for designation (**Exhibit 3.9-30**).

Exhibit 3.9-29. Area 5: Capitol Hill/Central District—SL-designated, NRHP-, and WHR-listed Districts

Property Name, Type	Register/List Date/Significance	Period of Significance
Volunteer Park—Seattle, District	NRHP / 1976 / Criterion A for Community Planning, and Criterion C for Architecture, Landscape Architecture, and Engineering	1903–1912
Harvard-Belmont Landmark District, District	SL / 1980 / Criterion D for Architecture and Landscape Architecture	Ca. 1900–1940
Harvard-Belmont District, District	NRHP / 1982 / Criterion A for Education and Social History, and Criterion C for Architecture and Landscape Architecture	Ca. 1900–1930
Chittenden Locks and Lake Washington Ship Canal, District	NRHP / 1978 / Criterion A for Commerce, Politics/Government, and Criterion C for Architecture, Engineering, and Landscape Architecture	1906–1917
Roanoke Park Historic District, District	NRHP / 2009 / Criterion A for Commerce, Law, and Politics/Government, and Criterion C for Architecture	1899–1939
Lake Washington Boulevard, District	NRHP / 2017 / Criterion A for Community Planning and Development, Recreation and Culture, and Transportation, and Criterion C for Landscape Architecture	1904–1963
Montlake Historic District, District	NRHP / 2015 / Criterion C for Architecture	1904–1959
Millionaire's Row Historic District, District	NRHP / 2021 / Criterion A for Community Planning and Development, and Criterion C for Architecture	1902–1967
Row Houses on 23rd Avenue—Seattle, District	WHR / 1970 / Criterion A for Social History and Community Planning and Development, and Criterion C for Architecture	1893–1970

Sources: DAHP, 2023.

There are 46 individually listed resources within the area that are listed in the NRHP and 7 WHR-listed properties (for more information see the WISAARD map with the "Register Public" layer turned on). Of these 18 are residential buildings, 5 are religious facilities, 3 are apartment buildings, 3 are fire stations, 5 are club facilities, 3 are schools, 2 are parks, 1 is an assay office, 1 is a commercial building, 1 is a hotel, 1 is an art museum, and 3 are bridges, which were listed in the NRHP under the *Historic Bridges and Tunnels in Washington State MPD* (**Exhibit 3.9-31**).

Current King County Tax Assessor records show that within the Capitol Hill/Central District area, there are 14,100 historic-period buildings. Of these, 12,355 are residential, including 11,158 residential buildings (single family dwellings, townhouses, duplexes, triplexes, and fourplexes), 984 apartment buildings, and 213 condominiums. The remaining 1,745 buildings are commercial, industrial, and governmental (**Exhibit 3.9-32**).

In contrast, DAHP records show 11,887 individual historic-period architectural resources have been entered on HPI forms within the Capitol Hill/Central District area. Of these, only 399 were determined NRHP-eligible by DAHP or a federal agency and are plotted on the map (**Exhibit 3.9-32**). Many of the 11,887 HPI forms were created by data transfer for an Assessors Data Project for King County. The resources in these HPIs were not formally surveyed and recorded, have neither eligibility recommendations nor determinations of eligibility, and the forms contain no survey data of any kind.

The discrepancy between the Assessor's and DAHP's records are likely in part due to demolitions that alter County Tax Assessor's records but do not change the records in DAHP's WISAARD database, and/or a lack of up-to-date survey and recordation of historic-period resources on HPI forms in WISAARD.

DAHP records show 38 cultural resources studies that included archaeological resources investigations that have been conducted within Analysis Zone 5 since 1995. Three precontact sites and eleven historic-period sites have been recorded within Analysis Zone 5. One of the historic-period sites was determined eligible for listing in the NRHP, eight historic-period sites were determined not eligible for listing in the NRHP, and the remaining five sites have not been formally evaluated for listing in the NRHP. The shorelines, adjacent low-elevation areas, and much of the southwestern (i.e., the First Hill, Yesler Terrace, and Atlantic neighborhoods) and northwestern (i.e., Arboretum and Washington Park neighborhoods) portions of Analysis Zone 5 are considered of High or Very High Risk to contain precontact archaeological resources by DAHP's precontact archaeological site probability model. The remainder of Analysis Zone 5, including most of the Capitol Hill neighborhood and other upland areas, are considered of Moderately Low to Moderate Risk (**Exhibit 3.9-33**).

Culturally Important Resources

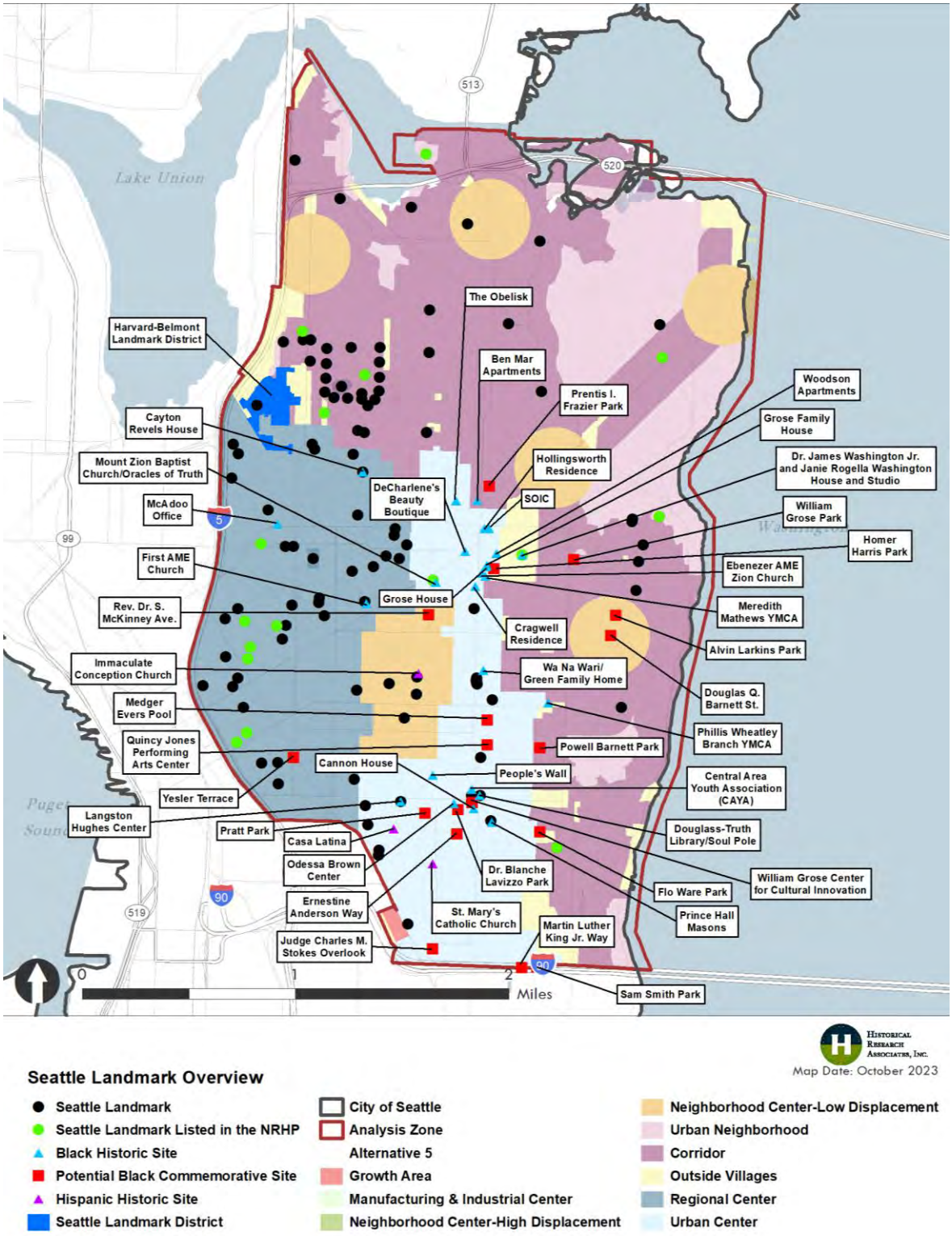
There are 25 Black Historic Sites in Analysis Zone 5, including the Ben Mar Apartments, Cannon House, Cayton Revels House (which is a designated SL), Central Area Youth Association (CAYA), Cragwell Residence, DeCharlene's Beauty Boutique, Douglass-Truth Library/Soul Pole (which is a designated SL), the Ebenezer AME Zion Church, First AME Church (which is a designated SL),

Grose House, Grose Family House, Hollingsworth Residence, Langston Hughes Center (which is a designated SL), Meredith Mathews YMCA, McAdoo Office, Mount Zion Baptist Church/Oracles of Truth (which is a designated SL), Odessa Brown Center, People's Wall, Prince Hall Masons (which is a designated SL), SOIC, The Obelisk, Wa Na Wari/Green Family Home, Dr. James Washington Jr. and Janie Rogella Washington House and Studio (which is a designated SL and listed in the NRHP), Phillis Wheatley Branch YWCA, and the Woodson Apartments (**Exhibit 3.9-30**) (Source: the Washington State Black Historic Sites Survey).

Additionally, there are 16 Potential Black Commemorative Sites, including Alvin Larkins Park, Flo Ware Park, Dr. Blanche Lavizzo Park, Homer Harris Park, Powell Barnett Park, Judge Charles M. Stokes Overlook, Pratt Park, Prentis I. Frazier Park, William Grose Park, Medgar Evers Pool, Ernestine Anderson Way, Rev. Dr. S. McKinney Avenue, Douglas Q. Barnett Street, Quincy Jones Performing Arts Center, Yesler Terrace, Sam Smith Park, Martin Luther King Jr. Way, and the William Grose Center for Cultural Innovation (**Exhibit 3.9-30**) (Source: the Washington State Black Historic Sites Survey).

There are 3 Hispanic Historic Sites in Analysis Zone 5, including the Immaculate Conception Church, Casa Latina, and St. Mary's Catholic Church (**Exhibit 3.9-30**) (Source: the 2018 Latino Heritage Survey).

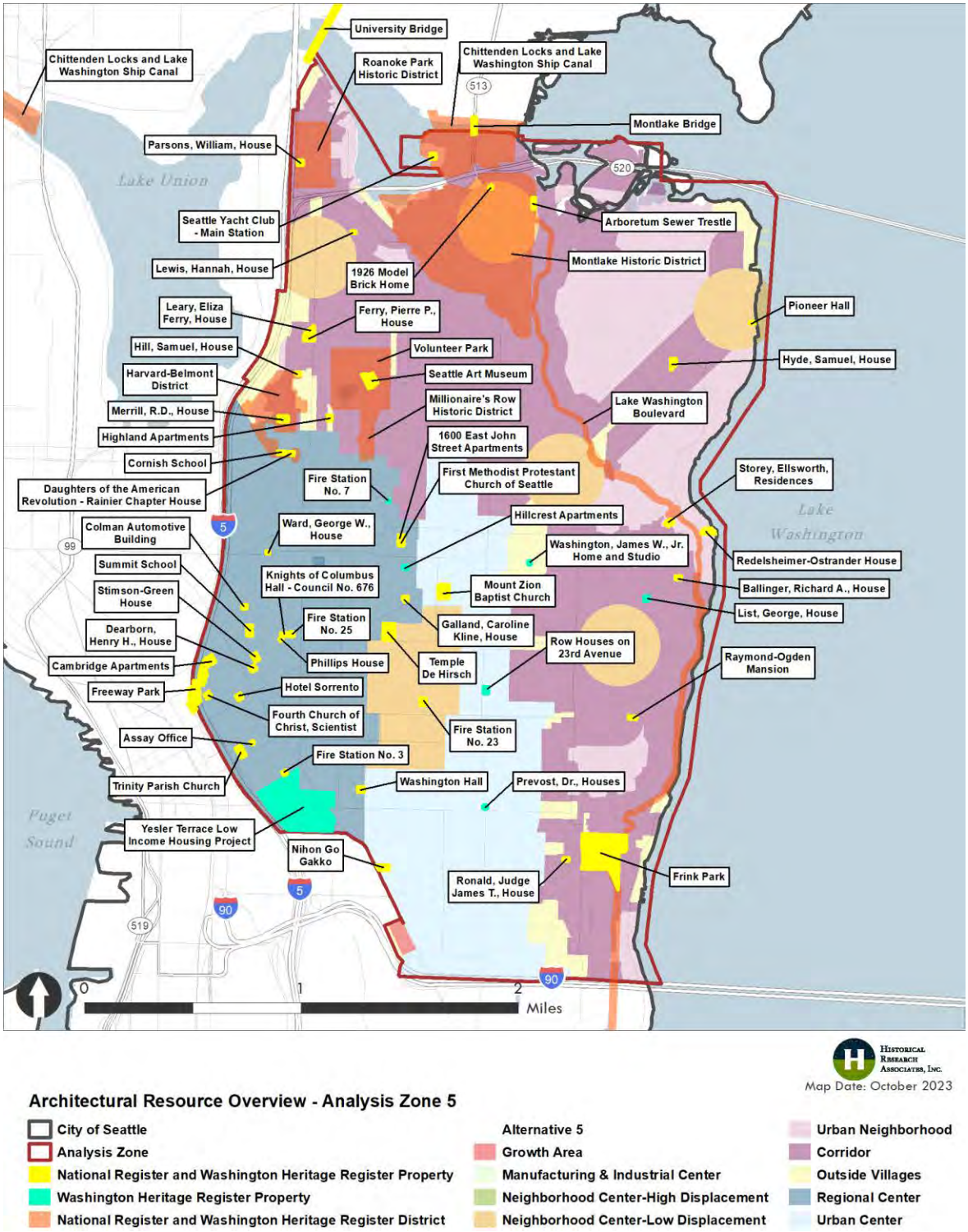
Exhibit 3.9-30. Area 5: Capitol Hill/Central District—Designated Seattle Landmarks, Seattle Historic Districts, and Culturally Important Resources



Note: Base map shown for the cultural maps is Alternative 5, as it was the most extensive amount of change studied in the Draft EIS and allowed for the maximum impact analysis.

Source: HRA, 2023.

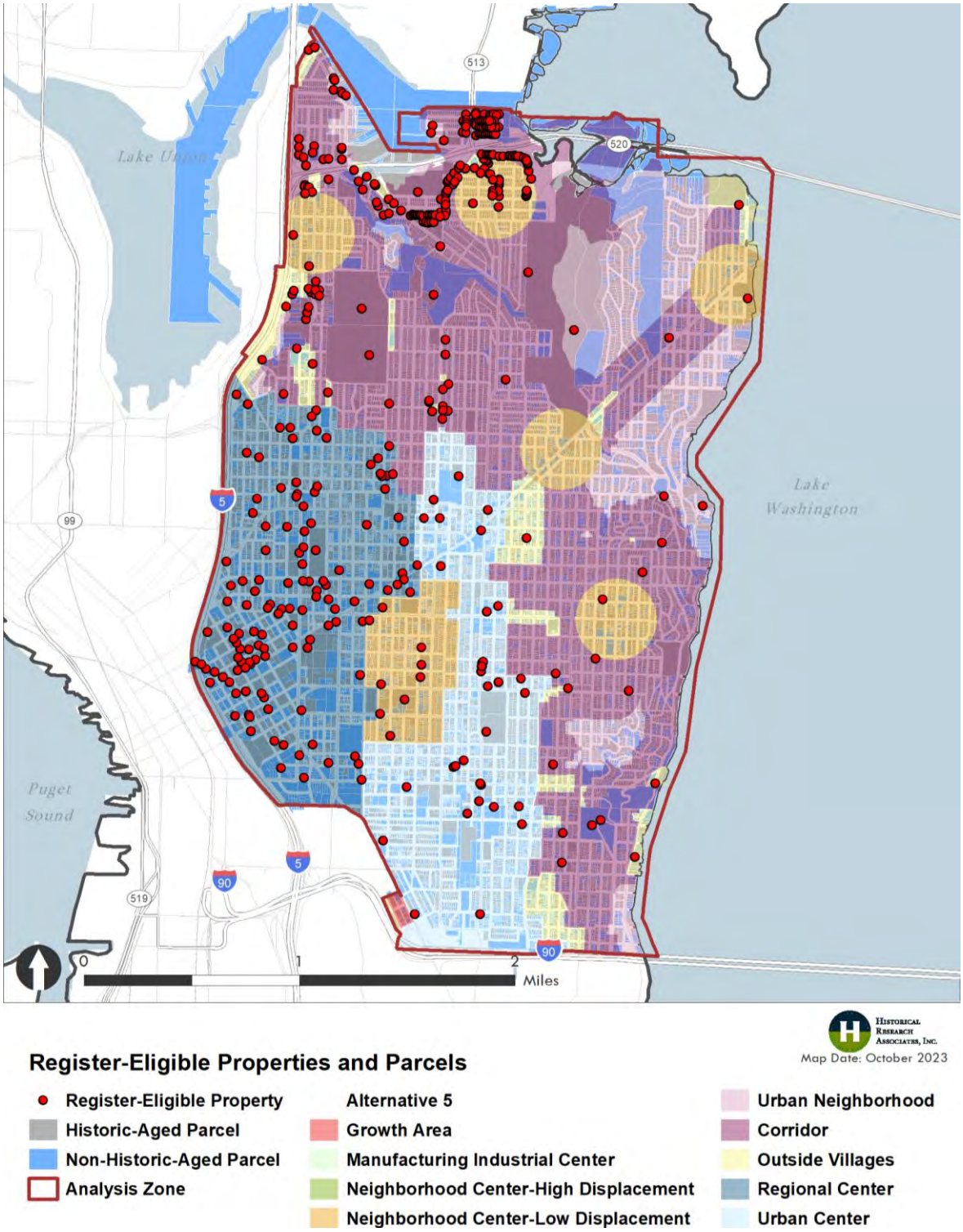
Exhibit 3.9-31. Area 5: Capitol Hill/Central District—NRHP- and WHR-Listed Architectural Properties and Districts



Note: Base map shown for the cultural maps is Alternative 5, as it was the most extensive amount of change studied in the Draft EIS and allowed for the maximum impact analysis.

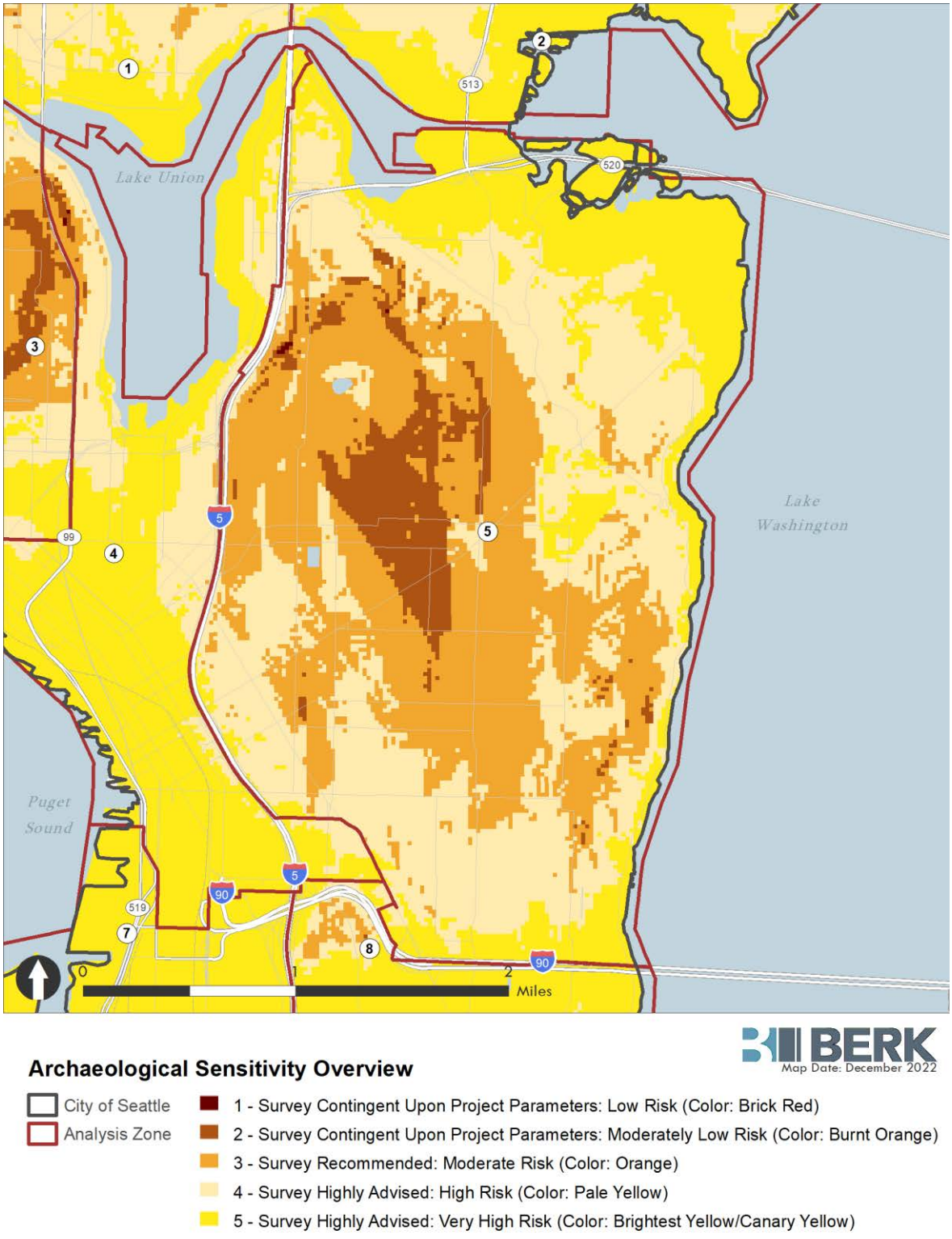
Source: HRA, 2023.

Exhibit 3.9-32. Area 5: Capitol Hill/Central District—Historic-Aged Parcels and NRHP-Eligible Resources



Note: Base map shown for the cultural maps is Alternative 5, as it was the most extensive amount of change studied in the Draft EIS and allowed for the maximum impact analysis.
Source: HRA, 2023.

Exhibit 3.9-33. Area 5: Capitol Hill/Central District—Map Showing Archaeological Sensitivity from DAHP Model



Source: HRA, 2023.

Area 6: West Seattle

Within the West Seattle analysis area, there are a large number of designated Seattle Landmarks. There are no SL-designated or NRHP- or WHR-listed historic districts in the area. As there only a few NRHP- and WHR-listed properties, these resources are listed in the table below (**Exhibit 3.9-34**).

There are 24 designated Seattle Landmarks in the West Seattle area. Of these, 6 are residential buildings, 5 are education-related buildings, 5 are commercial buildings, 2 are parks, 2 are religious institutions, 1 is a library, 1 is a theater, 1 is a fire station, and 1 is a bridge. These resources are significant under a variety of the six standards for designation (**Exhibit 3.9-35**).

Exhibit 3.9-34. Area 6: West Seattle—NRHP- and WHR-listed Properties

Property Name, Type	Register/List Date/Significance	Period of Significance
Seattle Carnegie Library—West Seattle Branch, Building	NRHP / 1982 / Criterion A for Education and Social History, and Criterion C for Architecture	1910
Schmitz Park Bridge, Structure	NRHP / 1982 / Criterion C for Engineering	1936
Frank B. Cooper Elementary School, Building	NRHP / 2003 / Criterion A for Education and Ethnic Heritage—African American, Criterion B for its association with Thelma Fisher Dewitty, and for Criterion C for Architecture	1917–1953
Fir Lodge, Building	NRHP / 2020 / Criterion A for Community Planning and Development, and Criterion C for Architecture	1903–1970
Alki Point and Duwamish Head, Site	WHR / 1970 / Criterion A for Education, Conservation, Science, and Urban Planning	1851–present

Sources: DAHP, 2023.

As noted in the table above, within the West Seattle analysis area there are 4 NRHP-listed resources and 1 WHR-listed resource. Of these, 1 is a bridge, which was listed in the NRHP under the *Historic Bridges and Tunnels in Washington State MPD,* and 1 is a Carnegie library, which was listed in the NRHP under the *Carnegie Libraries of Washington TR* (**Exhibit 3.9-36**).

Current King County Tax Assessor records show that within the West Seattle area, there are 22,764 historic-period buildings. Of these, 21,843 are residential, including 21,373 residential buildings (single family dwellings, townhouses, duplexes, triplexes, and fourplexes), 396 apartment buildings, and 74 condominiums. The remaining 921 buildings are commercial, industrial, and governmental (**Exhibit 3.9-37**).

In contrast, DAHP records show 16,777 individual historic-period architectural resources have been entered on HPI forms within the West Seattle area. Of these, only 48 were determined NRHP-eligible by DAHP or a federal agency and are plotted on the map (**Exhibit 3.9-37**). Many of the 16,777 HPI forms were created by data transfer for an Assessors Data Project for King

County. The resources in these HPIs were not formally surveyed and recorded, have neither eligibility recommendations nor determinations of eligibility, and the forms contain no survey data of any kind.

The discrepancy between the Assessor's and DAHP's records are likely in part due to demolitions that alter County Tax Assessor's records but do not change the records in DAHP's WISAARD database, and/or a lack of up-to-date survey and recordation of historic-period resources on HPI forms in WISAARD.

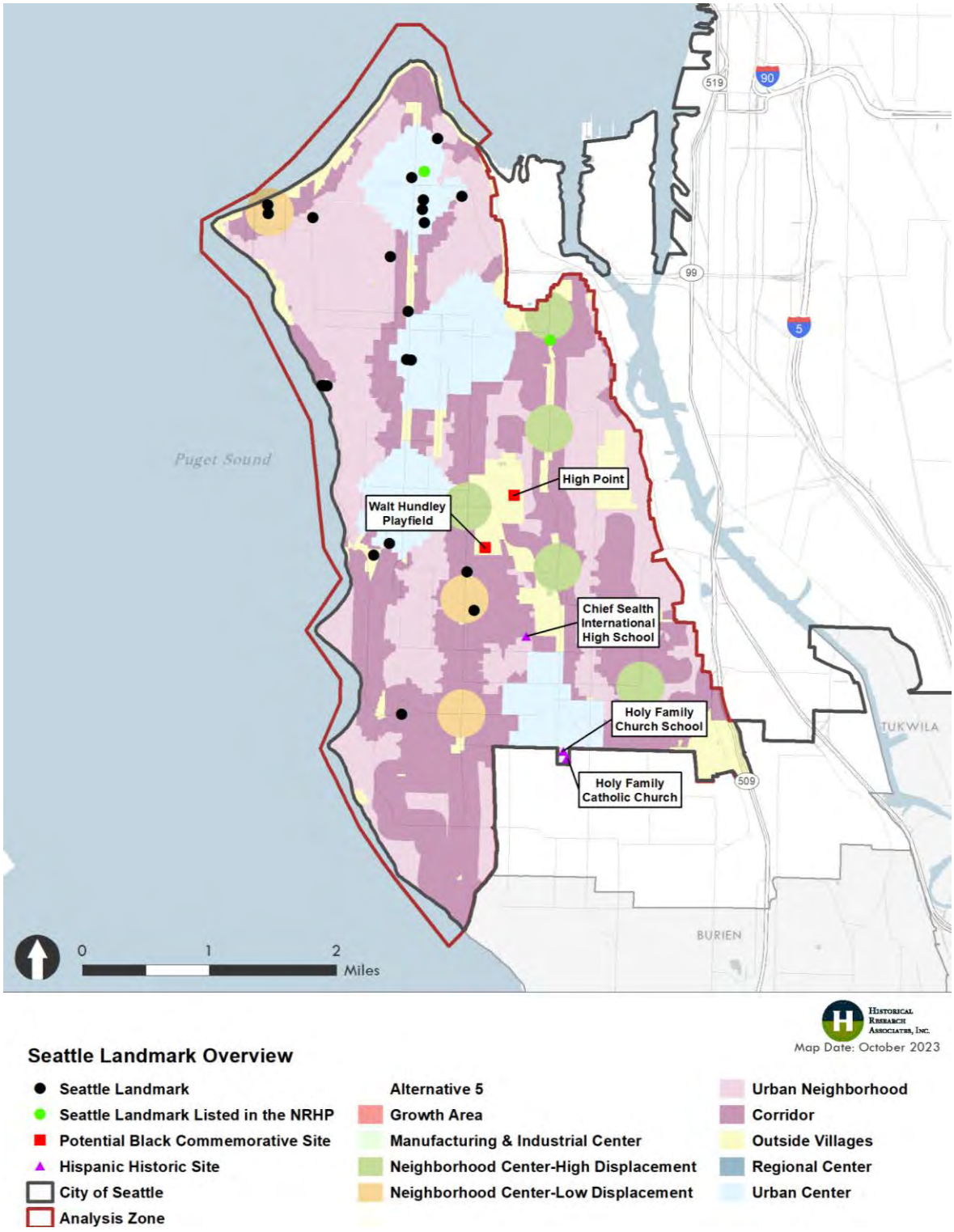
DAHP records show 33 cultural resources studies that included archaeological resources investigations that have been conducted within Analysis Zone 6 since 1995. Two precontact sites, six historic-period sites, and one multicomponent site have been recorded within Analysis Zone 6. One of the historic-period sites was determined not eligible for listing in the NRHP and the remaining eight sites have not been formally evaluated for listing in the NRHP. Most of Analysis Zone 6 is considered of High or Very High Risk to contain precontact archaeological resources by DAHP's precontact archaeological site probability model. Areas of Moderately Low to Moderate Risk are primarily located in upland settings in the central and southern portions of Analysis Zone 6 (**Exhibit 3.9-38**).

Culturally Important Resources

There are 2 Potential Black Commemorative Sites in Analysis Zone 6, including Walt Hundley Playfield and High Point neighborhood (**Exhibit 3.9-35**) (Source: the Washington State Black Historic Sites Survey).

There are 3 Hispanic Historic Sites in Analysis Zone 6, including Chief Sealth International High School, Holy Family Church School, and the Holy Family Catholic Church (**Exhibit 3.9-35**) (Source: the 2018 Latino Heritage Survey).

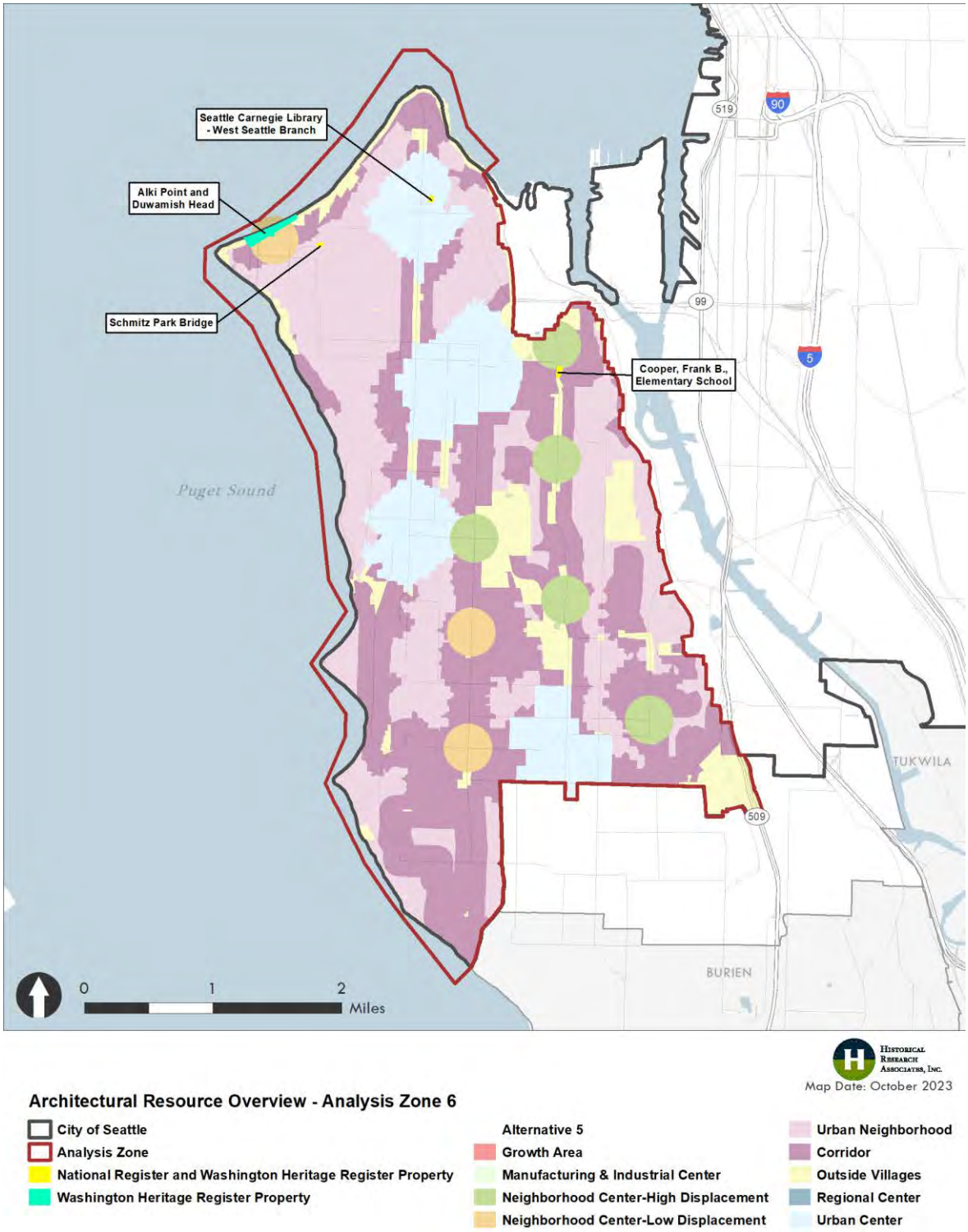
Exhibit 3.9-35. Area 6: West Seattle—Designated Seattle Landmarks, Seattle Historic Districts, and Culturally Important Resources



Note: Base map shown for the cultural maps is Alternative 5, as it was the most extensive amount of change studied in the Draft EIS and allowed for the maximum impact analysis.

Source: HRA, 2023.

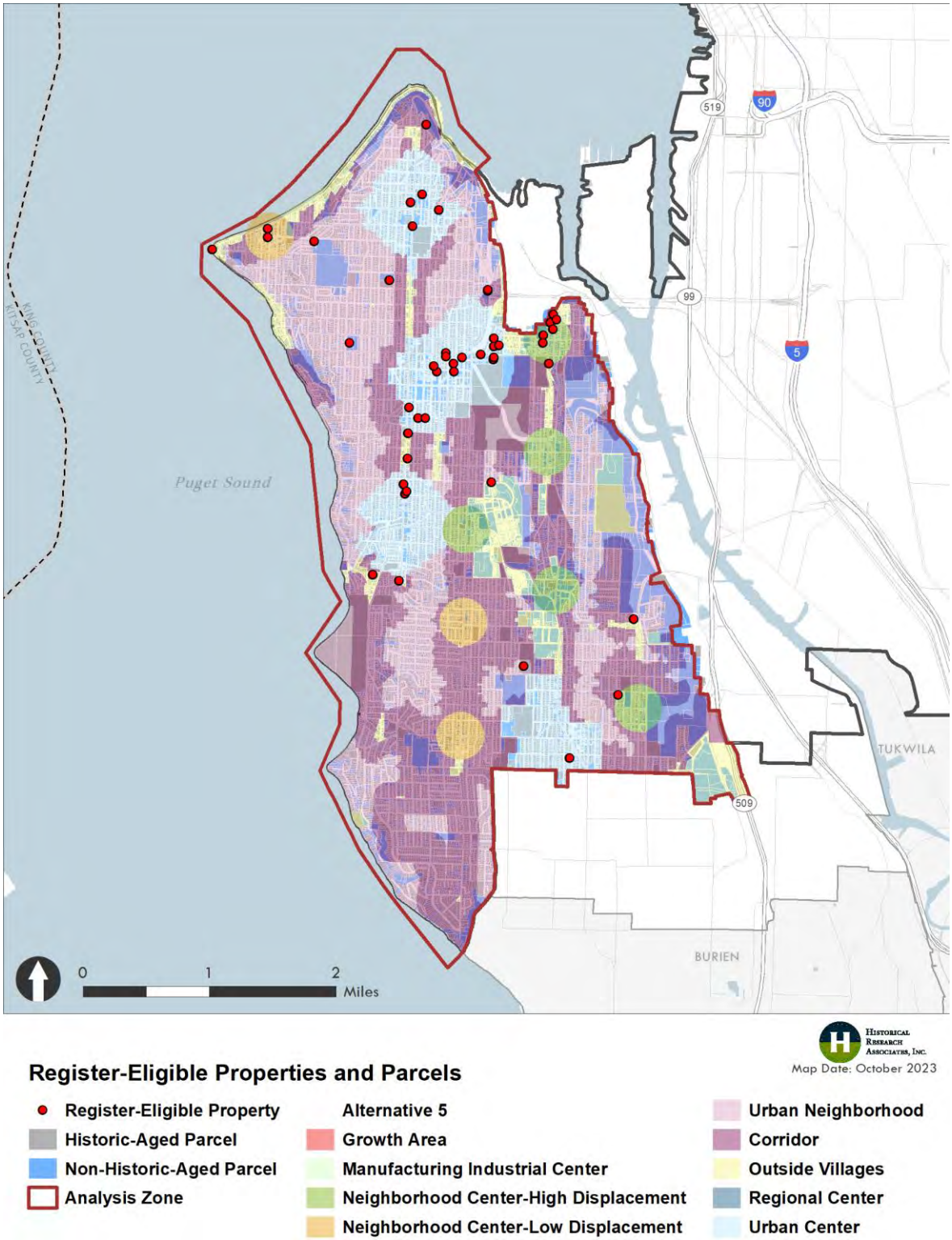
Exhibit 3.9-36. Area 6: West Seattle—NRHP- and WHR-Listed Architectural Properties and Districts



Note: Base map shown for the cultural maps is Alternative 5, as it was the most extensive amount of change studied in the Draft EIS and allowed for the maximum impact analysis.

Source: HRA, 2023.

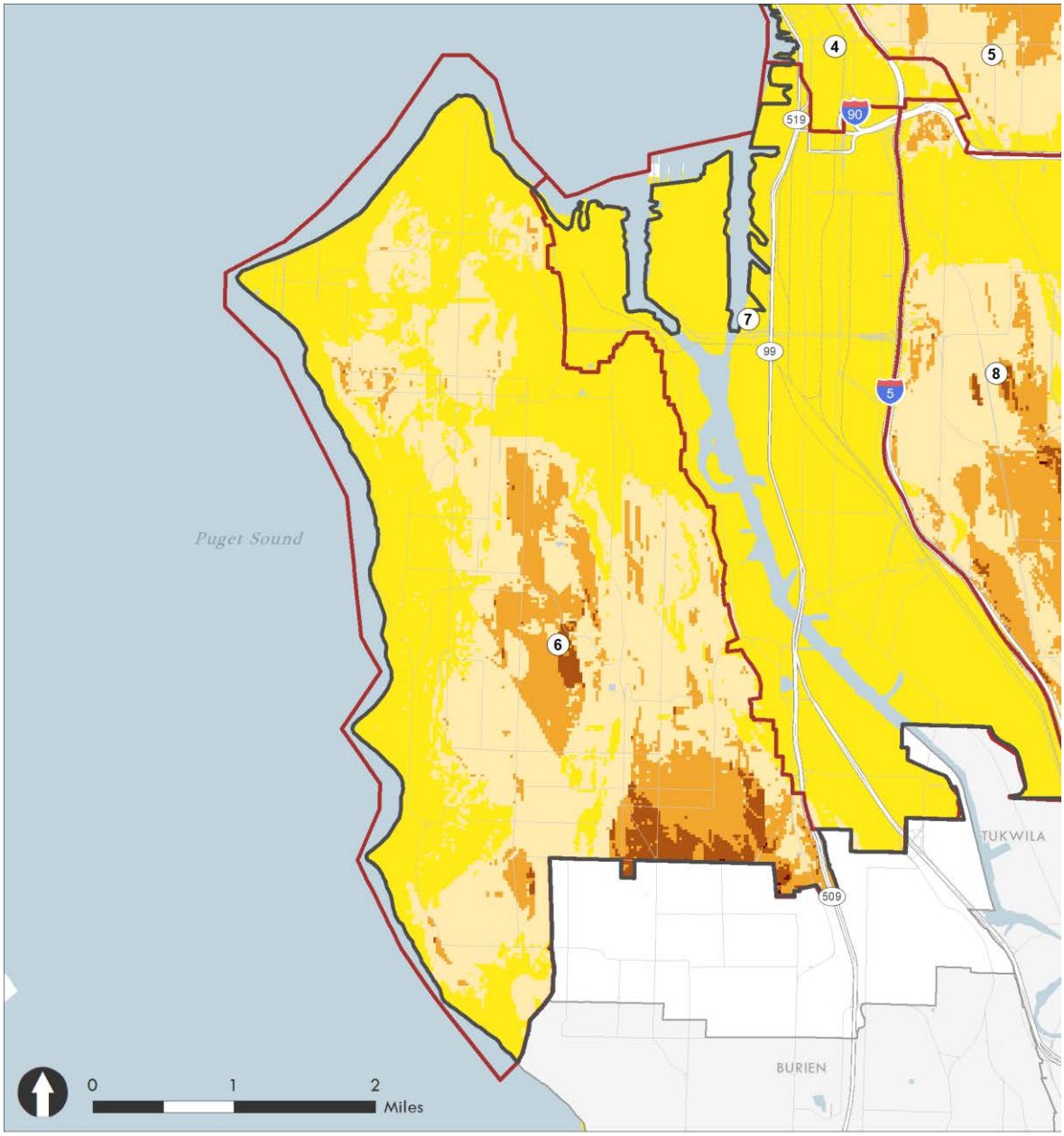
Exhibit 3.9-37. Area 6: West Seattle—Historic-Aged Parcels and NRHP-Eligible Resources



Note: Base map shown for the cultural maps is Alternative 5, as it was the most extensive amount of change studied in the Draft EIS and allowed for the maximum impact analysis.

Source: HRA, 2023.

Exhibit 3.9-38. Area 6: West Seattle—Map Showing Archaeological Sensitivity from DAHP Model



Source: HRA, 2023.

Area 7: Duwamish

Within the Duwamish analysis area, there are a large number of designated Seattle Landmarks, but there are no Seattle Landmark districts. As there are only a few National Historic Landmark, NRHP- and WHR-listed properties, these resources are listed in the table below (**Exhibit 3.9-39**).

There are 14 designated Seattle Landmarks in the Duwamish area. Of these, 6 are related to the Rainier Cold Storage & Ice/Seattle Brewing & Malting Company, 2 are fire stations, 2 are related to the Georgetown Steam Plant, 1 is a gas station, 1 is an educational facility, 1 is a residential building, and 1 is a railroad bridge. These resources are significant under a variety of the six standards for designation (**Exhibit 3.9-40**).

Exhibit 3.9-39. Area 7: Duwamish—NHL-listed Properties, and NRHP- and WHR-listed Districts and Properties

Property Name, Type	Register/List Date/Significance	Period of Significance
Seattle Electric Company Georgetown Steam Plant, Building	NHL / 1984 / Criterion C for Engineering	1906–1908, 1917
Pioneer Square--Skid Road Historic District (Including Boundary Increases), District	NRHP / 2008 / Criterion A for Community Planning and Development, Industry, Commerce, Transportation, Politics/Government, and Social History, and Criterion C for Architecture, Landscape Architecture, and Engineering	1889–1931
Triangle Hotel and Bar, Building	NRHP / 1976 / Criterion A for Commerce, and Criterion C for Architecture	1909–1910
Old Georgetown City Hall, building	NRHP / 1983 / Criterion A for Politics/Government	1909
A.L. Palmer Building, Building	NRHP / 2008 / Criterion A for Commerce and Industry, Criterion B for its association with Alfred L. Palmer, and Criterion C for Architecture	1910
Bay View Brewery, Building	NRHP / 2013 / Criterion A for Industry and Commerce, Criterion B for its association with Andrew Hemrich and Emil Sick, and Criterion C for Architecture	1886–1962
Ford Motor Company Assembly Plant, Building	NRHP / 2013 / Criterion A for Industry, and Criterion C for Architecture	1932
U.S.S. Nebraska Launching (Skinner and Eddy Shipyard), Site	WHR / 1974 / Criterion A for Industry, Transportation, Maritime History, and Military (Naval History)	1904, 1916–1920
First Service Station Site—Seattle, Site	WHR / 1970 / Criterion A for Commerce, Industry, and Transportation	1907
Maple Donation Claim, Site	WHR / 1970 / Criterion A for Local History (Settlement)	1851
Gorst Field, Site	WHR / 1970 / Criterion A for Industry, Commerce, and Transportation, and Criterion C for Engineering	Ca. 1920

Sources: DAHP, 2023.

As noted in the table above, there are 1 National Historic Landmark, which is also listed in the NRHP, 1 NRHP-listed historic district, 5 individually NRHP-listed resources, and 4 WHR-listed resources found in the Duwamish analysis area (**Exhibit 3.9-41**).

Current King County Tax Assessor records show that within the Duwamish area, there are 2,115 historic-period buildings. Of these, 1,052 are residential, including 994 residential buildings (single family dwellings, townhouses, duplexes, triplexes, and fourplexes), 55 apartment buildings, and 3 condominiums. The remaining 1,063 buildings are commercial, industrial, and governmental (**Exhibit 3.9-42**).

In contrast, DAHP records show 2,217 individual historic-period architectural resources have been entered on HPI forms within the Duwamish area. Of these, only 84 were determined NRHP-eligible by DAHP or a federal agency and are plotted on the map (**Exhibit 3.9-42**). Many of these HPI forms were created by data transfer for an Assessors Data Project for King County. The resources in these HPIs were not formally surveyed and recorded, have neither eligibility recommendations nor determinations of eligibility, and the forms contain no survey data of any kind.

The discrepancy between the Assessor's and DAHP's records are likely in part due to demolitions that alter County Tax Assessor's records but do not change the records in DAHP's WISAARD database, and/or a lack of up-to-date survey and recordation of historic-period resources on HPI forms in WISAARD.

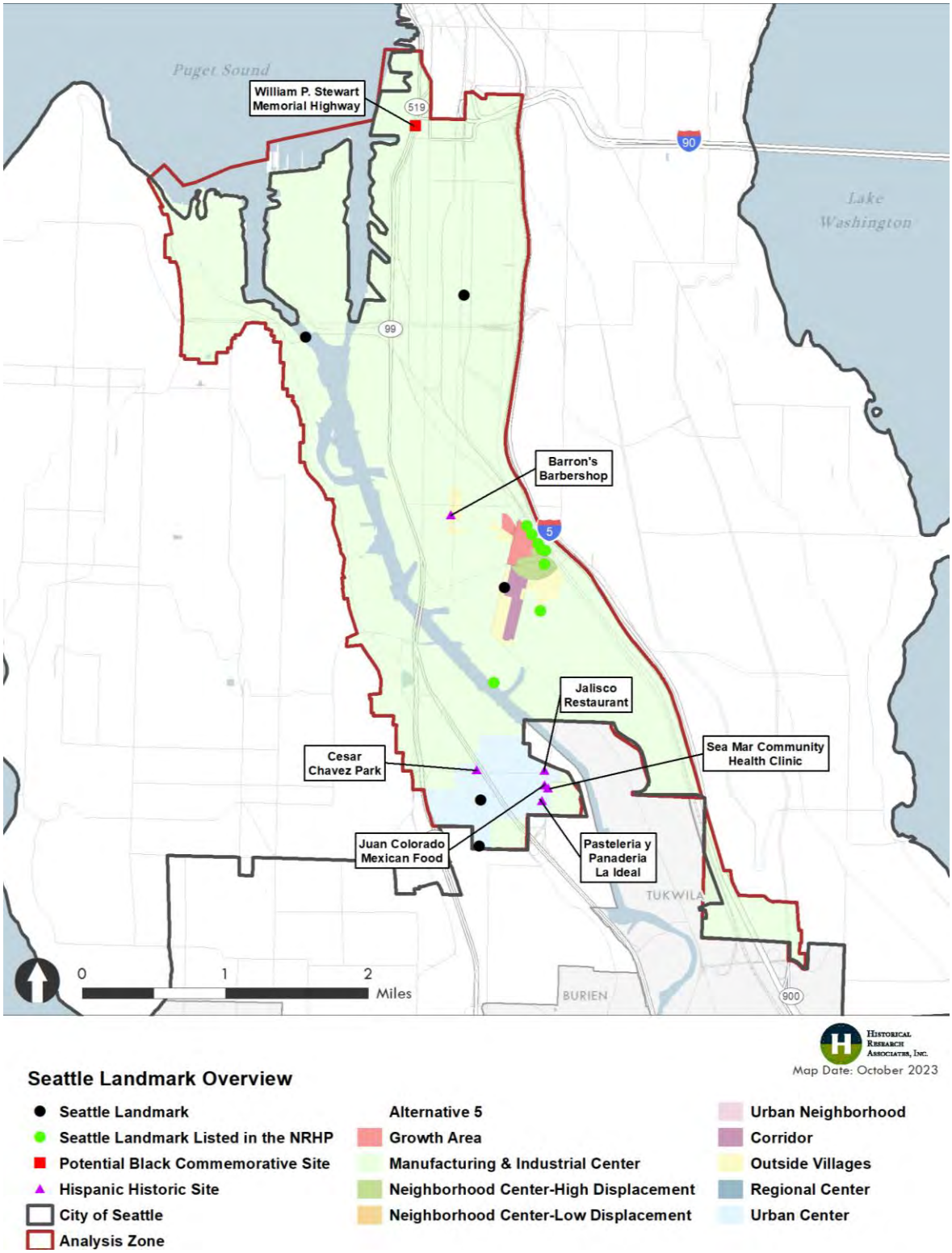
DAHP records show 70 cultural resources studies that included archaeological resources investigations that have been conducted within Analysis Zone 7 since 1995. Seven precontact sites, twenty-nine historic-period sites, and one multicomponent site have been recorded within Analysis Zone 7. One of the precontact sites is listed in the NRHP, one of the precontact sites was determined eligible for listing in the NRHP, nine of the historic-period sites were determined not eligible for listing in the NRHP, and the remaining twenty-six sites have not been formally evaluated for listing in the NRHP. All of Analysis Zone 7 is considered of Very High Risk to contain precontact archaeological resources by DAHP's precontact archaeological site probability model (**Exhibit 3.9-43**).

Culturally Important Resources

There is 1 Potential Black Commemorative Site in Analysis Zone 7: the William P. Stewart Highway (**Exhibit 3.9-40**) (Source: the Washington State Black Historic Sites Survey).

There are 6 Hispanic Historic Sites in Analysis Zone 7, including Barron's Barbershop, Cesar Chavez Park, Jalisco Restaurant, Sea Mar Community Health Clinic, Juan Colorado Mexican Food, and Pasteleria y Panaderia La Ideal (**Exhibit 3.9-40**) (Source: the 2018 Latino Heritage Survey).

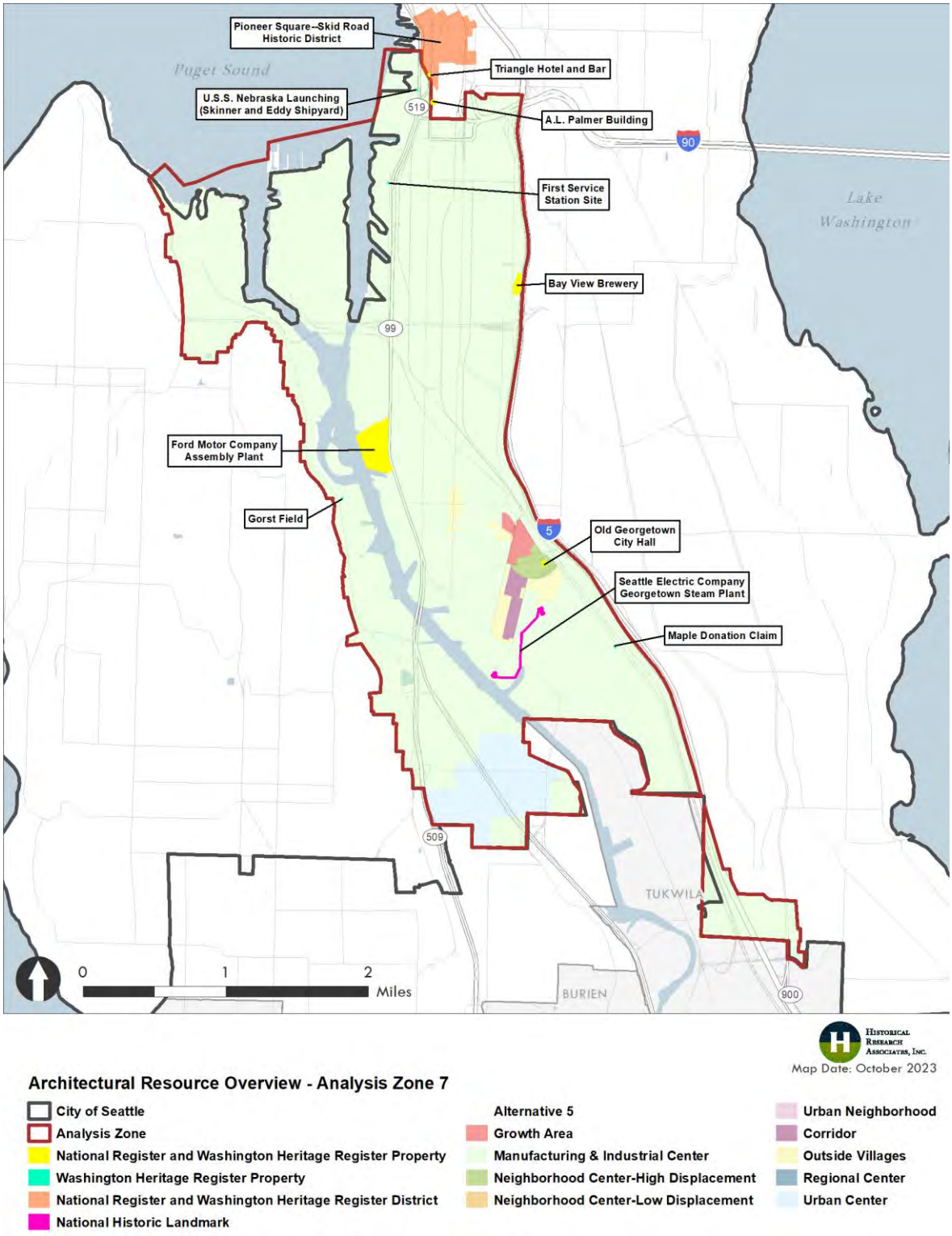
Exhibit 3.9-40. Area 7: Duwamish—Designated Seattle Landmarks, Seattle Historic Districts, and Culturally Important Resources



Note: Base map shown for the cultural maps is Alternative 5, as it was the most extensive amount of change studied in the Draft EIS and allowed for the maximum impact analysis.

Source: HRA, 2023.

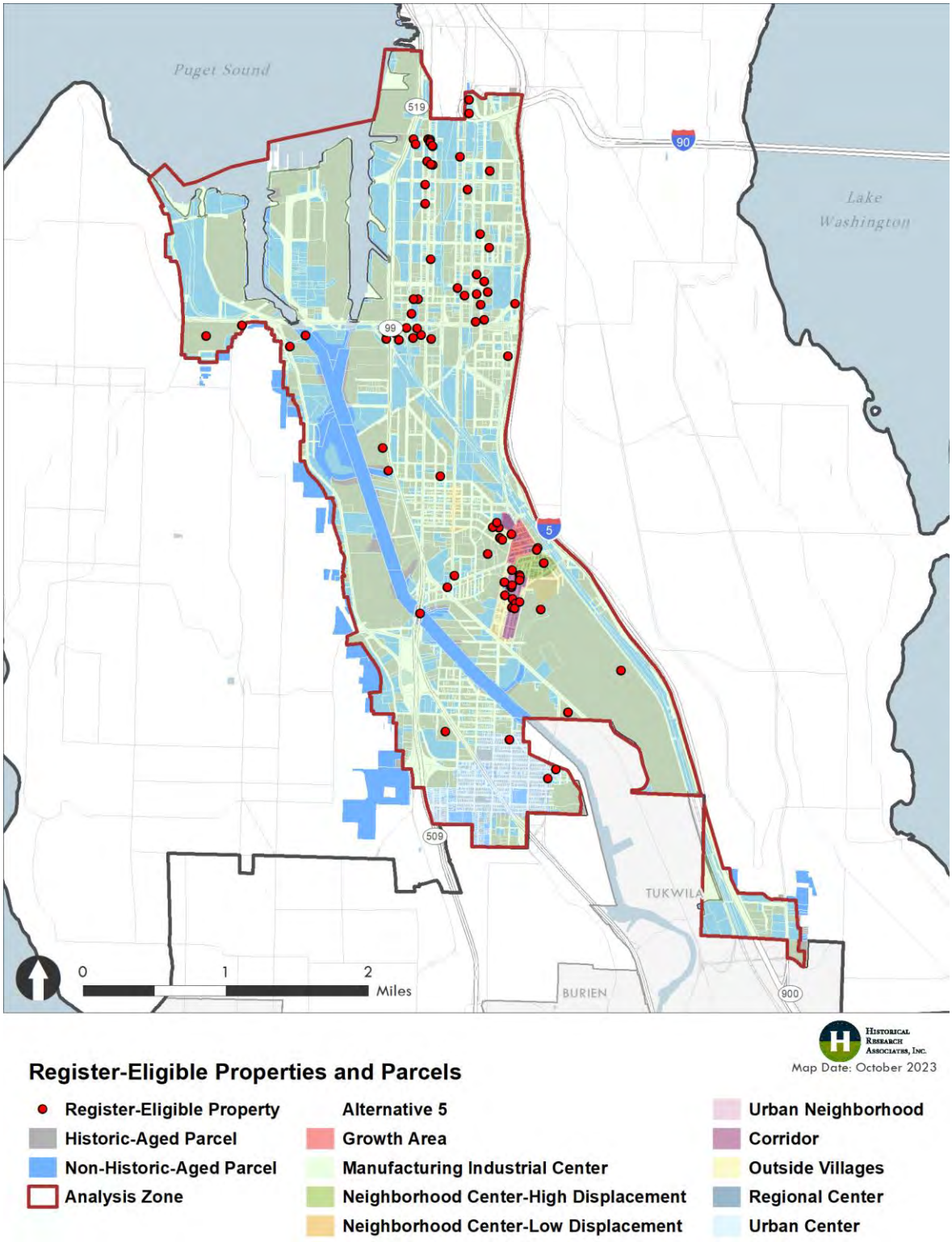
Exhibit 3.9-41. Area 7: Duwamish—NHL-, NRHP- and WHR-Listed Architectural Properties and Districts



Note: Base map shown for the cultural maps is Alternative 5, as it was the most extensive amount of change studied in the Draft EIS and allowed for the maximum impact analysis.

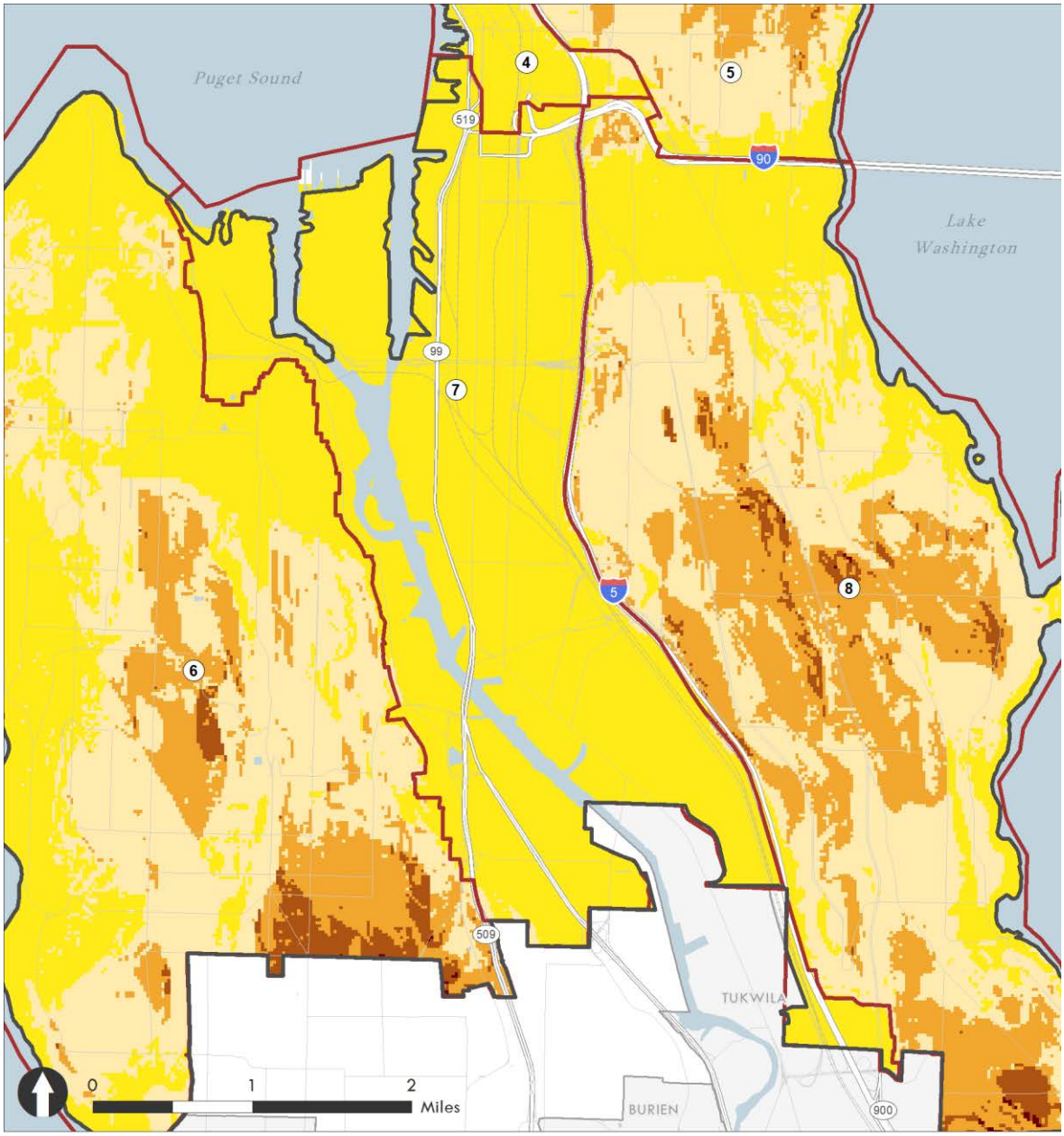
Source: HRA, 2023.

Exhibit 3.9-42. Area 7: Duwamish—Historic-Aged Parcels and NRHP-Eligible Resources



Note: Base map shown for the cultural maps is Alternative 5, as it was the most extensive amount of change studied in the Draft EIS and allowed for the maximum impact analysis.
Source: HRA, 2023.

Exhibit 3.9-43. Area 7: Duwamish—Map Showing Archaeological Sensitivity from DAHP Model



Source: HRA, 2023.

Area 8: SE Seattle

There are 1 Seattle Landmark district and 4 NRHP-listed historic districts located in the SE Seattle analysis area. These resources are listed in the table below (**Exhibit 3.9-44**).

There are a large number of Seattle Landmarks in the SE Seattle area. Adding these resources to the table would create a table that spans a number of pages, so they will be only briefly mentioned here. There are 34 designated Seattle Landmarks in the SE Seattle area. Of these, 17 are residential buildings, 6 are education-related buildings, 2 are religious institutions, 2 are fire stations, 1 is a hospital, 1 is a boulevard, 1 is a street clock, 1 is a bridge, 1 is a garden, 1 is a clubhouse, and 1 is an inn. These resources are significant under a variety of the six standards for designation and **Exhibit 3.9-45**).

Exhibit 3.9-44. Area 8: SE Seattle—SL-designated and NRHP-listed Districts

Property Name, Type	Register/List Date/Significance	Period of Significance
Columbia City Landmark District, District	SL / 1978 / Criterion A for Development of Seattle, Criterion C for Cultural and Economic Heritage of the Community, and Criterion D for Architecture	1893–1936
Columbia City Historic District, District	NRHP / 2005 / Criterion A for Community Planning and Development, Commerce, Transportation, and Social History, and Criterion C for Architecture	1891–1937
Ellsworth Storey Cottages Historic District, District	NRHP / 1976 / Criterion C for Architecture and Landscape Architecture	1912–1916
Lake Washington Boulevard, District	NRHP / 2017 / Criterion A for Community Planning and Development, Recreation and Culture, and Transportation, and Criterion C for Landscape Architecture	1904–1963
Mount Baker Park Historic District, District	NRHP / 2018/ Criterion A for Community Planning and Development, and Social History, and Criterion C for Architecture and Landscape Architecture	1907–1968

Sources: DAHP, 2023.

There are 14 NRHP-listed and 1 WHR-listed resources found in the SE Seattle analysis area. Of the 15 individually listed resources, 6 are residences, 2 are schools, 2 are sites, 1 is a clubhouse, 1 is a hospital, 1 is a tunnel and 1 is a bridge, which were listed in the NRHP under the *Historic Bridges and Tunnels in Washington State MPD,* and, finally, 1 is a Carnegie library, which was listed in the NRHP under the *Carnegie Libraries of Washington TR* (**Exhibit 3.9-46**).

Current King County Tax Assessor records show that within the SE Seattle area, there are 19,734 historic-period buildings. Of these, 18,827 are residential, including 18,481 residential buildings (single family dwellings, townhouses, duplexes, triplexes, and fourplexes), 319 apartment buildings, and 27 condominiums. The remaining 907 buildings are commercial, industrial, and governmental (**Exhibit 3.9-47**).

In contrast, DAHP records show 15,163 individual historic-period architectural resources have been entered on HPI forms within the SE Seattle area. Of these, only 80 were determined NRHP-eligible by DAHP or a federal agency and are plotted on the map (**Exhibit 3.9-47**). Many of the15,163 HPI forms were created by data transfer for an Assessors Data Project for King County. The resources in these HPIs were not formally surveyed and recorded, have neither eligibility recommendations nor determinations of eligibility, and the forms contain no survey data of any kind.

The discrepancy between the Assessor's and DAHP's records are likely due in part to demolitions that alter County Tax Assessor's records but do not change the records in DAHP's WISAARD database, and/or a lack of up-to-date survey and recordation of historic-period resources on HPI forms in WISAARD.

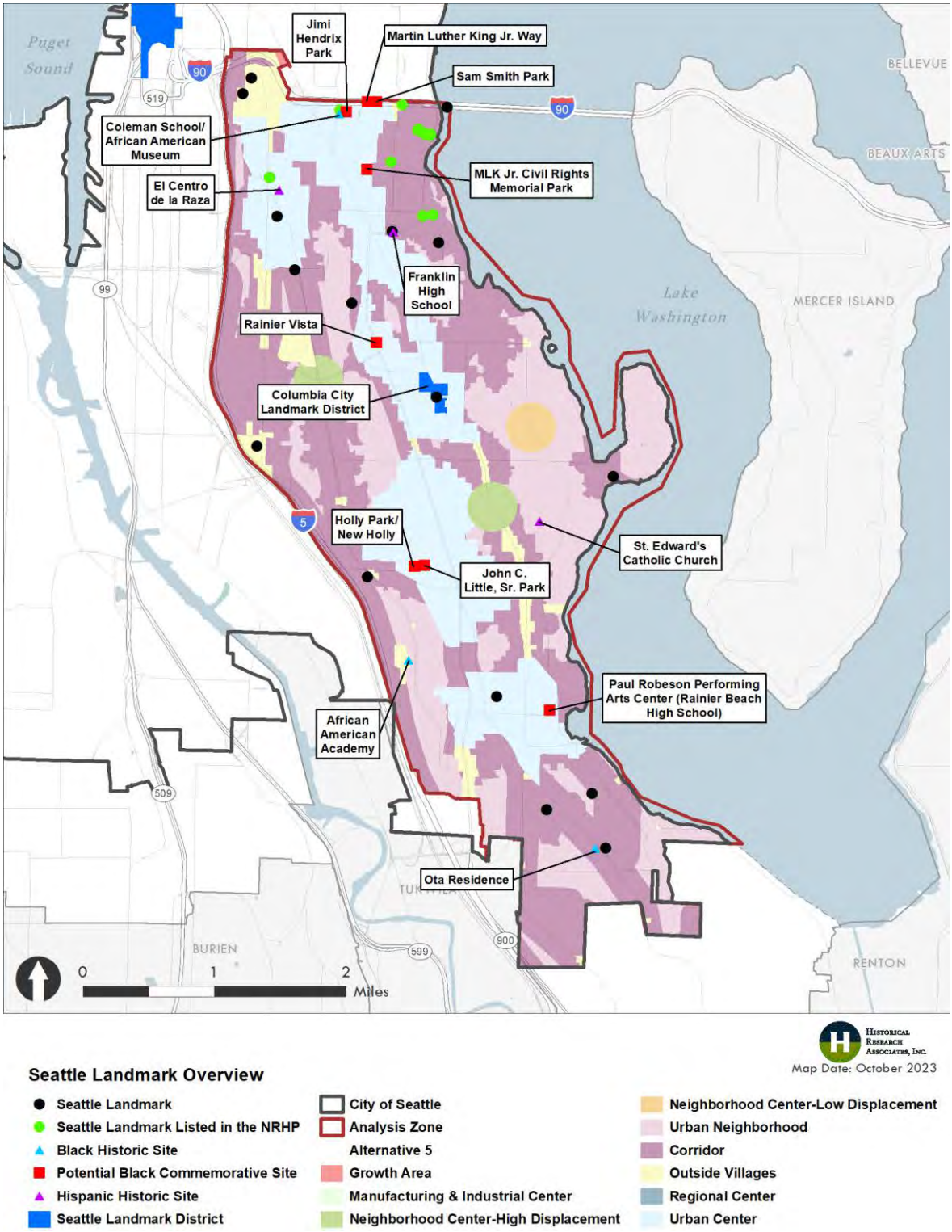
DAHP records show 16 cultural resources studies that included archaeological resources investigations that have been conducted within Analysis Zone 8 since 1995. Seven historic-period sites have been recorded within Analysis Zone 8. One of the sites was determined not eligible for listing in the NRHP and the remaining six sites have not been formally evaluated for listing in the NRHP. Much of Analysis Zone 8 is considered of High to Very High Risk to contain precontact archaeological resources by DAHP's precontact archaeological site probability model. Areas of Moderately Low to Moderate Risk are located in upland settings across the central portion and south end of Analysis Zone 8 (**Exhibit 3.9-48**).

Culturally Important Resources

There are 3 Black Historic Sites in Analysis Zone 8, including the African American Academy, Coleman School/African American Museum (which is a designated Seattle Landmark), and the Ota Residence. There are 8 Potential Black Commemorative Sites in Analysis Zone 8, including John C. Little, Sr. Park, Jimi Hendrix Park, MLK Jr. Civil Rights Memorial Park, Paul Robeson Performing Arts Center (Rainier Beach High School), Rainier Vista, Holly Park/New Holly, Sam Smith Park, and Martin Luther King Jr. Way (**Exhibit 3.9-45**) (Source: the Washington State Black Historic Sites Survey).

There are 3 Hispanic Historic Sites in Analysis Zone 8, including El Centro de la Raza, Franklin High School, and St. Edward's Catholic Church **Exhibit 3.9-45**) (Source: the 2018 Latino Heritage Survey).

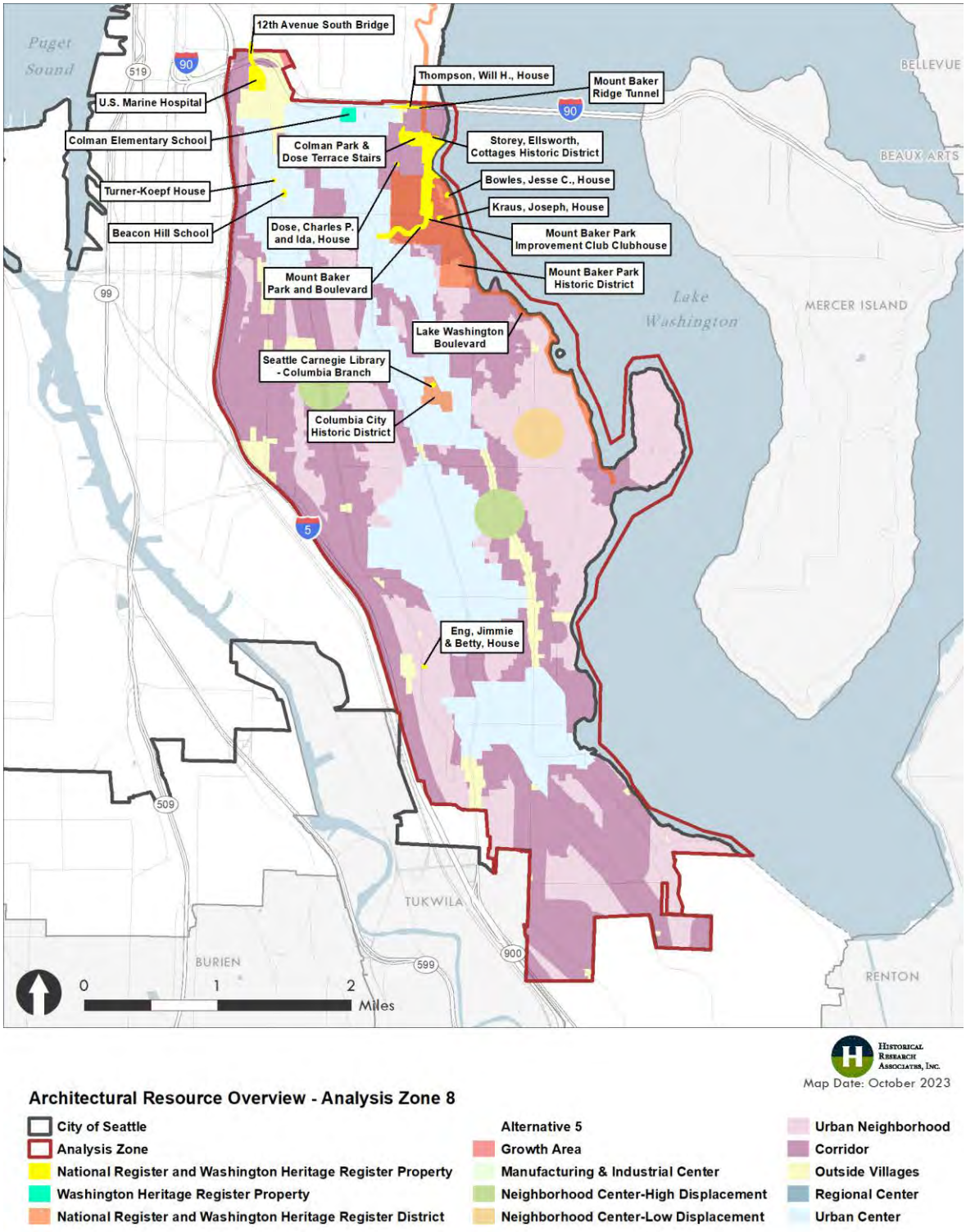
Exhibit 3.9-45. Area 8: SE Seattle—Designated Seattle Landmarks, Seattle Historic Districts, and Culturally Important Resources



Note: Base map shown for the cultural maps is Alternative 5, as it was the most extensive amount of change studied in the Draft EIS and allowed for the maximum impact analysis.

Source: HRA, 2023.

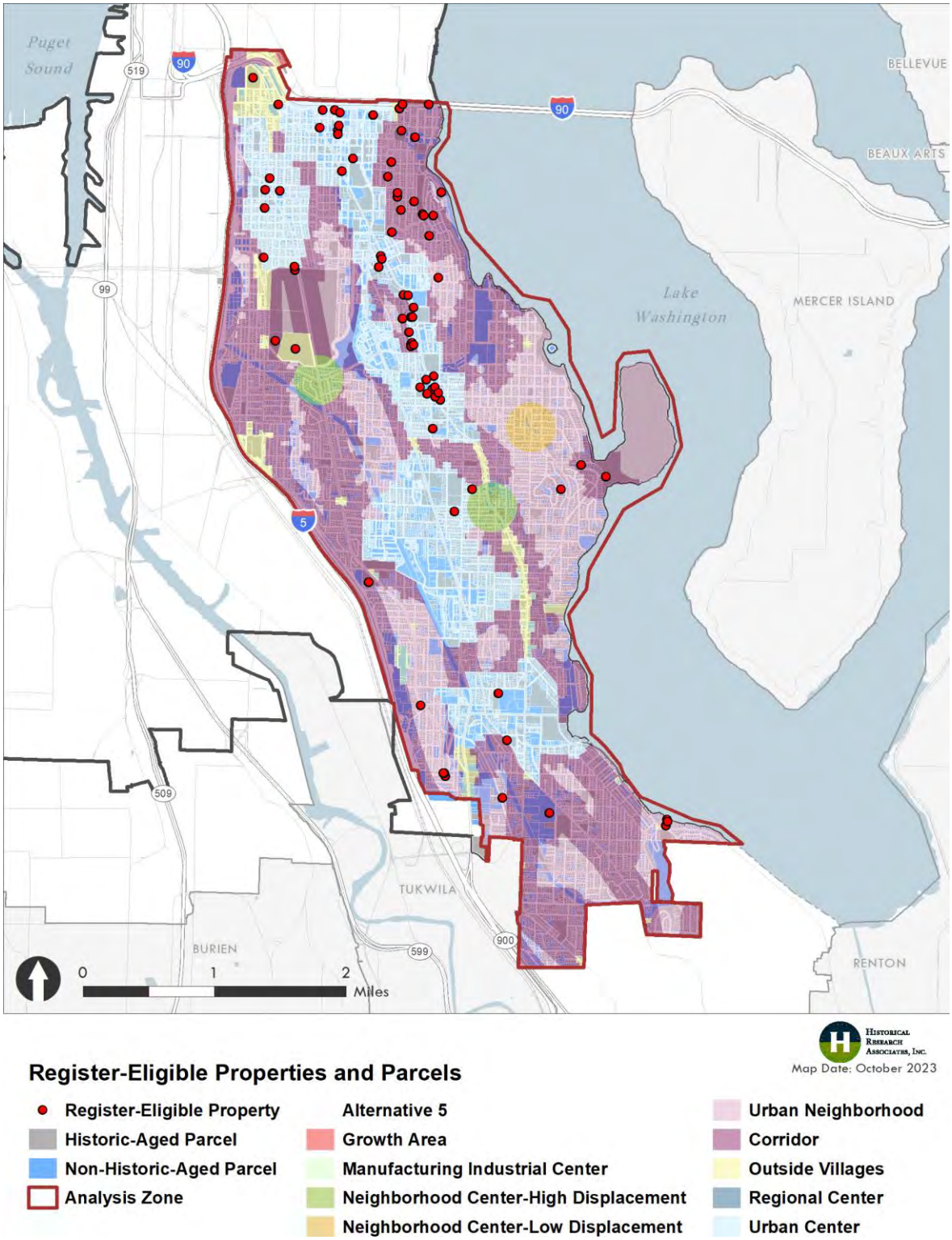
Exhibit 3.9-46. Area 8: SE Seattle—NRHP- and WHR-Listed Architectural Properties and Districts



Note: Base map shown for the cultural maps is Alternative 5, as it was the most extensive amount of change studied in the Draft EIS and allowed for the maximum impact analysis.

Source: HRA, 2023.

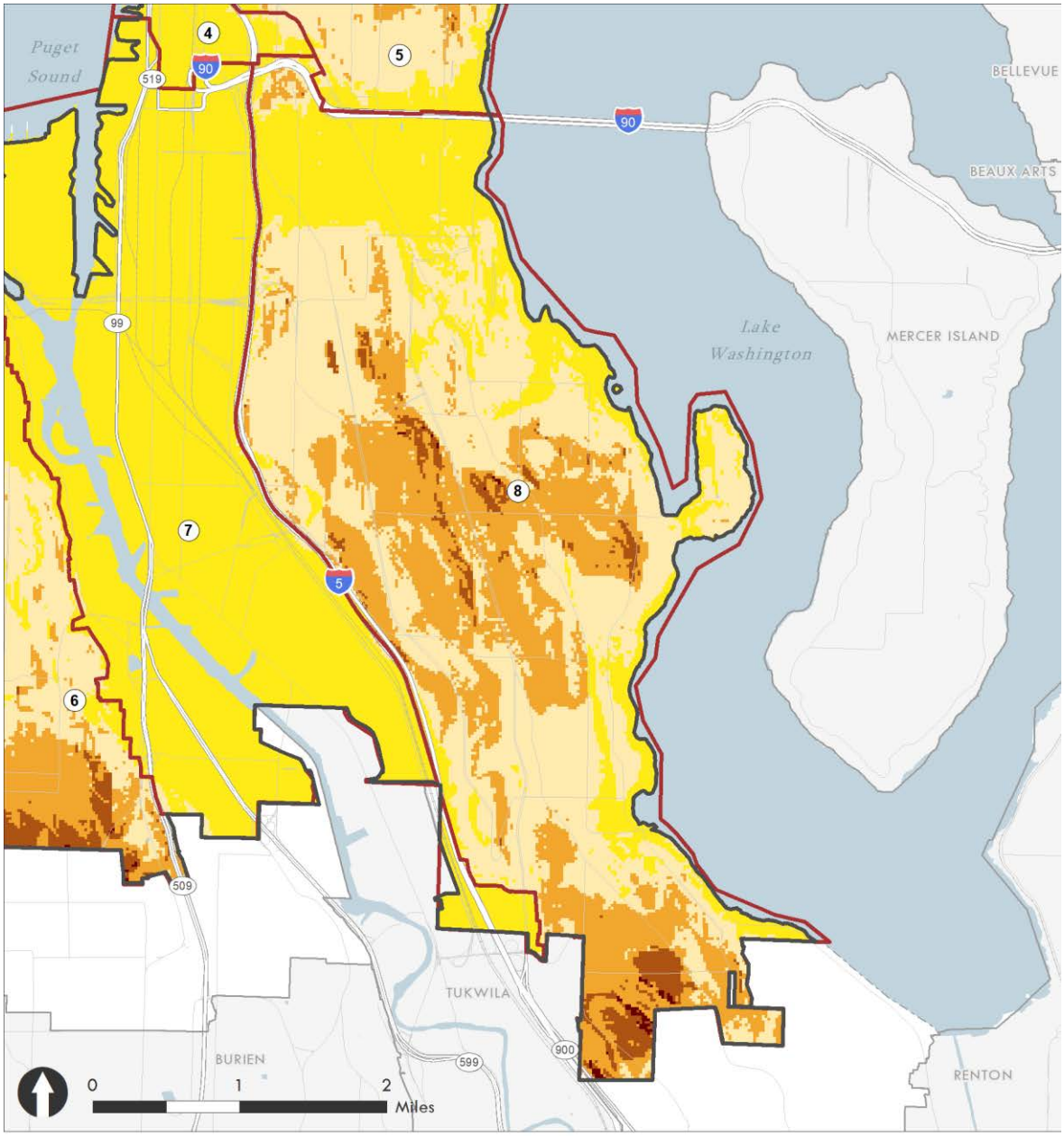
Exhibit 3.9-47. Area 8: SE Seattle—Historic-Aged Parcels and NRHP-Eligible Resources



Note: Base map shown for the cultural maps is Alternative 5, as it was the most extensive amount of change studied in the Draft EIS and allowed for the maximum impact analysis.

Source: HRA, 2023.

Exhibit 3.9-48. Area 8: SE Seattle—Map Showing Archaeological Sensitivity from DAHP Model



Source: HRA, 2023.

3.9.2 Impacts

This section considers the impacts of the alternatives on cultural resources within the study area.

Impacts of the alternatives on cultural resources are considered significant if they result in:

- Substantial adverse changes to, alteration, or loss of a resource that impacts its eligibility for inclusion as an SL, or in the NRHP, NHL program, or the WHR.
- Adverse impacts (potential loss of or alterations to the physical evidence or tangible evidence of cultural history) to Culturally Important Resources (CIR), which for the purposes of this EIS are important to certain cultural groups or communities, whether or not they are listed or eligible for the SL, NRHP, or WHR.

Resources that have been officially determined not eligible for these registers or considered CIR will not be adversely impacted by the proposed alternatives.

Impacts Common to All Alternatives

Full Study Area

All the alternatives have the potential to affect districts, sites, landscapes, or buildings, structures, objects (BSOs) that have been designated as an SL or listed in the NRHP and WHR, and those resources that have been determined eligible for listing in the NRHP. Additionally, the alternatives could potentially affect the numerous BSOs and unidentified archaeological sites that have yet to be surveyed and assessed for potential eligibility for listing in the registers.

Impacts to cultural resources in the study areas from the No Action Alternative and ~~four~~ five action alternatives were identified by assessing potential for both above- and below-ground changes. Such impacts generally include physical alteration, damage, or destruction of all or part of a resource; alteration of the characteristics of the surrounding environment that contribute to the property's significance; the introduction of visual or audible elements that are out of character with the property; and in the case of designated SLs, obstruction of protected public views of historic landmarks designated by the Landmarks Preservation Board. In other words, impacts are actions that would alter, directly or indirectly, any of the characteristics of a historic property in such a way that would diminish its integrity of location, design, setting, materials, workmanship, feeling, and association, and would affect its eligibility to qualify for inclusion in the NRHP or other historic registers have the potential to impact cultural resources.

Some of the action alternatives include proposed land-use changes such as allowing a wider range of housing options in residential zones and expanding housing choices; incentivizing development and densification of housing with stacked flats and multi-story, multi-family buildings; and some areas of mixed-use residential construction in selected locations (see **Exhibit 3.9-3**). Historic-period BSOs located in the study area could be subject to demolition

for new construction, incompatible alterations/additions, and inappropriate renovation of existing buildings for reuse under all alternatives. Such demolition and construction projects could require substantial below-ground work, thus negatively and irreversibly impacting below-ground archaeological and cultural resources. DAHP's archaeological predictive model, used to establish probabilities for precontact cultural resources, depicts much of the land within the study area as within a High or Very High Risk area, primarily because of proximity of Puget Sound, Salmon Bay, Lake Union, Elliott Bay, and the Duwamish River, and the use-history throughout the precontact and historic periods.

Additionally, Washington SEPA allows some projects to be exempt from SEPA review. SEPA exemptions vary by location, zone, and use. While SEPA review considers impacts from alterations to an SL (project must be reviewed and a Certificate of Approval issued by the Department of Neighborhoods [DON]/SL District Board) and impacts for projects that are adjacent to SLs (or across the street), some exempted projects are not subject to the same review and could impact cultural resources (Seattle Department of Construction and Inspections [SDCI] 2022; Seattle Department of Neighborhoods 2015).

Since development may occur in any location in the study area under any alternative, it is possible that cultural resources could be impacted under each alternative. Changes to zoning that allow a wider range of residential and/or commercial growth could spur redevelopment in those locations. This could occur, for example, where the focused growth within neighborhood centers would allow for a wide range of housing types and commercial space or within Neighborhood Residential zones where the ~~broad~~ expansion of housing options would allow for and possibly incentivize increased density on larger lots throughout the study area. Even where there are no formally designated historic properties, there are numerous properties with historic-period buildings, many of which have never been formally surveyed and evaluated for eligibility but could potentially qualify for designation as an SL or listing in the NRHP. Many are located in an area with a High or Very High Risk of archaeological resources.

Development or redevelopment is likely to impact cultural resources. The main differences among the alternatives are the level of residential development. Considering acres that may be affected by residential development in **Exhibit 3.3-4** and **Appendix G**, the total acres affected are highest under the Preferred Alternative overall, followed by Alternative 3 and Alternative 5. Generally, more development/redevelopment could impact more cultural resources. However, as described above, under any of the action alternatives there could be similar impacts to cultural resources due to variability in the location and timing of redevelopment, lack of full cultural surveys or assessments of historic resources, development exempt from SEPA review, and individual development applicant preferences regarding historic preservation.

Area 1: NW Seattle

All alternatives have the potential to affect the known and unknown cultural resources in the NW Seattle area. The NW Seattle area contains 3 NRHP-listed historic districts, 14 individually listed resources, 2 WHR-listed resources, 32 SL-designated resources, and 34,045 historic-

period buildings and structures, 59 of which have been determined eligible for listing in the NRHP. Survey has identified 1 Black historic site, 2 potential Black commemorative sites, and 1 Hispanic historic site within the NW Seattle area. Due to the area's concentration of historic-period BSOs—many of which have yet to be surveyed and evaluated for eligibility—it is plausible that many could potentially be determined eligible for listing in the NRHP and local registers, and additional CIRs. In the NW Seattle area, 8 known archaeological sites have been previously recorded; however, due to the area's mix of Moderate to Very High Risk for archaeological and cultural resources, many more as yet unknown sites could be present.

Area 2: NE Seattle

All alternatives have the potential to affect the known and unknown cultural resources in the NE Seattle area. The NE Seattle area contains 3 NRHP-listed historic districts, 18 individually listed resources, 9 WHR-listed resources, 39 SL-designated resources, and 28,352 historic-period buildings and structures, 140 of which have been determined eligible for listing in the NRHP. Survey has identified 2 Hispanic historic sites within the NE Seattle area. Due to the area's concentration of historic-period BSOs—many of which have yet to be surveyed and evaluated for eligibility—it is plausible that many could be determined eligible for listing in the NRHP and local registers, and additional CIRs. In the NE Seattle area, 10 archaeological sites have been previously recorded; however, due to the area's mix of Moderate to Very High Risk for archaeological and cultural resources, many more as yet unknown sites could be present.

130th/145th Station Area

All alternatives have the potential to affect the known and unknown cultural resources in the 130th/145th Station Area. While there are no NRHP- or WHR-listed historic districts or individually listed resources found within the 130th/145th Station Area, there are 3 SL-designated resources. Within the station area there are 5,260 historic-period buildings and structures, 2 of which have been determined eligible for listing in the NRHP. Due to the area's concentration of historic-period BSOs—most of which have yet to be surveyed and evaluated for eligibility—it is plausible that many could be determined eligible for listing in the NRHP and local registers. In the 130th/145th station area, 1 archaeological site has been previously recorded. However, due to the area's Moderate to Very High Risk for archaeological and cultural resources, many more as yet unknown sites could be present.

Area 3: Queen Anne/Magnolia

All alternatives have the potential to affect the known and unknown cultural resources in the Queen Anne/Magnolia area. The Queen Anne/Magnolia area contains 3 NRHP-listed historic districts, 19 individually listed resources, 4 WHR-listed resources, 59 SL-designated resources, and 12,546 historic-period buildings and structures, 120 of which have been determined eligible for listing in the NRHP. Survey has identified 1 Black Historic Site and 1 Potential Black Commemorative Site within the Queen Anne/Magnolia area. Due to the area's concentration of

historic-period BSOs—many of which have yet to be surveyed—it is plausible that many could be determined eligible for listing in the NRHP and local registers, and additional CIRs. In the Queen Anne/Magnolia area 14 archaeological sites have been previously recorded; however, due to the area's Very High Risk for archaeological and cultural resources, many more as yet unknown sites could be present.

Area 4: Downtown/Lake Union

All alternatives have the potential to affect the known and unknown cultural resources in the Downtown/Lake Union area. Found within the Downtown/Lake Union area are 6 NHLs, 3 NRHP-listed historic districts, 80 individually listed resources, 1 WHR-listed historic district, 20 individually listed WHR resources, 155 SL-designated resources, and 1,711 historic-period buildings and structures, 278 of which have been determined eligible for listing in the NRHP. Survey has identified 1 Black Historic Site and 1 Potential Black Commemorative Site within the Downtown/Lake Union area. Due to the area's concentration of historic-period BSOs—many of which have yet to be surveyed—it is plausible that many could be determined eligible for listing in the NRHP and local registers, and additional CIRs. In the Downtown/Lake Union area 1 historic archaeological site was listed in the NRHP and WHR and 35 historic-period sites have been previously recorded. Of these, 2 have been determined eligible for the NRHP. Due to the area's Very High Risk for archaeological and cultural resources, many more as yet unknown sites could be present.

Area 5: Capitol Hill/Central District

All alternatives have the potential to affect the known and unknown cultural resources in the Capitol Hill/Central District area. The Capitol Hill/Central District area contains 7 NRHP-listed historic districts, 46 individually listed resources, 7 WHR-listed resources, 117 SL-designated resources, and 14,100 historic-period buildings and structures, 399 of which have been determined eligible for listing in the NRHP. Survey has identified 25 Black Historic Sites, 16 Potential Black Commemorative Sites, and 3 Hispanic Historic Sites within the Capitol Hill/Central District area. Due to the area's concentration of historic-period BSOs—many of which have yet to be surveyed—it is plausible that many could be determined eligible for listing in the NRHP and local registers, and additional CIRs. In the Capitol Hill/Central District area, 14 archaeological sites have been previously recorded, with 1 determined eligible for listing in the NRHP. However, due to the area's Moderate to Very High Risk for archaeological and cultural resources, many more as yet unknown sites could be present.

Area 6: West Seattle

All alternatives have the potential to affect the known and unknown cultural resources in the West Seattle area. The West Seattle area contains 4 individually NRHP-listed resources, 1 WHR-listed resource, 24 SL-designated resources, and 22,764 historic-period buildings and structures, 48 of which have been determined eligible for listing in the NRHP. Survey has

identified 2 Potential Black Commemorative Sites and 3 Hispanic Historic Sites in the West Seattle Area. Due to the area's concentration of historic-period BSOs—many of which have yet to be surveyed—it is plausible that many could be determined eligible for listing in the NRHP and local registers, and additional CIRs. In the West Seattle area, 8 archaeological sites have been previously recorded, with none yet determined eligible for listing in the NRHP. However, due to the area's High to Very High Risk for archaeological and cultural resources, many more as yet unknown sites could be present.

Area 7: Duwamish

All alternatives have the potential to affect the known and unknown cultural resources in the Duwamish area. Found within the Duwamish area is 1 NHL, 1 NRHP-listed historic district, 5 individually listed resources, 4 WHR-listed resources, 14 SL-designated resources, and 2,115 historic-period buildings and structures, 84 of which have been determined eligible for listing in the NRHP. Survey has identified 1 Potential Black Commemorative Site and 6 Hispanic Historic Sites in the Duwamish area. Due to the area's concentration of historic-period BSOs—many of which have yet to be surveyed—it is plausible that many could be determined eligible for listing in the NRHP and local registers, and additional CIRs. In the Duwamish area, 38 archaeological sites have been previously recorded, with 1 precontact site listed in the NRHP and 1 precontact site determined eligible for listing in the NRHP. However, due to the area's Very High Risk for archaeological and cultural resources, many more as yet unknown sites could be present.

Area 8: SE Seattle

All alternatives have the potential to affect the known and unknown cultural resources in the SE Seattle area. Found within the SE Seattle area are 4 NRHP-listed historic districts, 14 individually listed resources, 1 WHR-listed resource, 34 SL-designated resources, and 19,734 historic-period buildings and structures, 80 of which have been determined eligible for listing in the NRHP. Survey has identified 3 Black Historic Sites, 8 Potential Black Commemorative Sites, and 3 Hispanic Historic Sites in SE Seattle area. Due to the area's concentration of historic-period BSOs—many of which have yet to be surveyed—it is plausible that many could be determined eligible for listing in the NRHP and local registers, and additional CIRs. In the SE Seattle area, 7 archaeological sites have been previously recorded, with none determined eligible for listing in the NRHP. However, due to the area's Moderate to Very High Risk for archaeological and cultural resources, many more as yet unknown sites could be present.

Equity & Climate Vulnerability Considerations

In 2015, Seattle established the City of Seattle Equity and Environment Initiative (EEI) to address the connection between race and social justice and the environment. The Community Partners Steering Committee (CPSC), working with City staff, defined EEI populations as people of color, immigrants, refugees, people with low incomes, and people with limited-English

proficiency (CPSC 2016:1–8). Studies by the National Trust for Historic Preservation (NTHP) have noted that while rezoning and redevelopment can address some of the particular issues in neighborhoods with high EEI populations of historically marginalized communities, such as poor air and water quality, soil contamination, noise pollution, climate change, and unsafe, disconnected, and inaccessible neighborhoods, some of the land use strategies could lead to adverse impacts such as the loss of historic and culturally important resources (CIRs) that have yet to be identified and documented within these communities (Canaan et al. 2021:54–55; NTHP 2021:10; Rypkema 2004).

Under all alternatives, should redevelopment occur within high EEI population neighborhoods in the study areas, benefits could be realized such as reinvestment in aging buildings, increased levels of homeownership/business ownership in newly rehabilitated buildings, and renovation/adaptive re-use of vacant and abandoned properties. However, there could also be adverse impacts from these benefits such as rising rents and property taxes, loss of "power" and "ownership" by long-term residents, and rising potential for conflicting priorities between new and long-term residents (Ryberg 2010:265–266; Rypkema 2004). These adverse impacts disproportionately affect EEI populations.

Analysis indicates that all alternatives have the potential to affect historic and cultural resources through development/redevelopment in historically marginalized neighborhoods in the study areas. Specifically, impacts to historic-period architectural resources could occur under all alternatives as a result of alteration, demolition, damage, or destruction to historic buildings associated with increased economic activity. Reinvestment may raise the cost of living, displacing long-term residents and weakening cultural cohesion. In addition, development under all alternatives could increase the probability of inadvertent discovery of archaeological and cultural resources because of foundation, circulation, and landscaping work.

Additionally, Indigenous populations may lose access to both known and potentially unrecorded cultural or spiritual sites due to redevelopment on their traditional lands in the study areas. As the locations of such resources are considered restricted information, specifics will not be discussed here without permission from the appropriate Tribes.

The Seattle area has experienced intensified weather events including heat, rain, snow, and flooding. These trends will doubtless continue due to Seattle's proximity to waterways. Impacts associated with intensified weather events (sea level rise, flooding, extreme storms, erosion, etc.) can potentially damage historic and cultural resources—both previously identified and as yet unknown (Calhoun 2023; CIG 2009:6–20; de Leon 2022; Seattle City Light 2015).

Impacts of Alternative 1: No Action

Alternative 1, No Action, maintains the status quo, with no changes to current Comprehensive Plan policies, development standards, or zoning, and with most housing and jobs remaining within existing regional centers (previously urban centers) and urban centers (previously urban villages) with no change to land use patterns. Under this alternative, new housing will continue to

be primarily rental apartments concentrated in existing mixed-use areas. Most of the land outside of the regional centers and urban centers will remain limited to detached houses.

Development projects due to market pressures under Alternative 1, No Action, would continue to affect cultural resources, with such impacts as alteration, demolition, damage, or destruction. Alternative 1, No Action, includes no additional protections or improvements in planning for consideration of impacts to cultural resources.

130th/145th Station Area

In the 130th/145th Station Area, NR zoning would continue to allow three-story, single-purpose residential development around the future light rail station at 130th Street and some four- to eight-story, multifamily development near the 145th Street BRT station. The blocks around 130th Street would see an additional 194 housing units and 646 units would be developed at 145th Street.

Development projects due to market pressures under Alternative 1, No Action, would continue to affect cultural resources, with such impacts as alteration, demolition, damage, or destruction. Alternative 1, No Action, includes no additional protections or improvements in planning for consideration of impacts to cultural resources.

Impacts of Alternative 2: Focused

Alternative 2 identifies specific locations for areas of focused growth (known as neighborhood centers) creating more housing around shops and services. Within neighborhood centers (previously neighborhood anchors), this alternative would allow a variety of housing options including duplexes, triplexes, fourplexes, sixplexes/three-story stacked flats, townhouses/rowhouses, and up to seven-story apartment buildings. Similar to urban centers (previously urban villages), which also allow for a wide range of housing types and commercial space, neighborhood centers would have a smaller geographic size and lower intensity of allowed development than urban centers. This alternative would result in a greater range of housing options with amenities and services in many neighborhoods with more constraints on growth than Alternatives 3, 4, ~~and~~ 5, and the Preferred Alternative. Regional centers (previously urban centers) and urban centers (previously urban villages), would gain up to 80,000 housing units, while neighborhood centers could gain up to 20,000 housing units with a mix of residential and mixed-use development. All neighborhood centers already contain areas zoned for commercial or mixed-use development; however, the City expects additional jobs and commercial space in these areas might increase more quickly due to the local demand for new housing.

Alternative 2 focuses housing growth around existing retail/commercial spaces. Typically, the neighborhood centers will be located in places where similar commercial, neighborhood commercial, and low-rise multi-family zoning is applied today but with expanded use allowances and development standards. These new neighborhood centers could incentivize

development to increase floor area and height limits allowing construction of dense multi-story buildings. Most residential growth under Alternative 2 would be in regional centers and neighborhood centers (low displacement risk), with most growth located in areas 4 (Downtown/Lake Union), 1 (NW Seattle), and 2 (NE Seattle). As described in the Affected Environment and mapped in **Exhibit 3.9-1,** some new neighborhood centers contain or abut listed historic properties or recorded archaeological resources, or contain mapped resources sensitivity areas (e.g., High to Very High Risk of archaeological and cultural sensitivity), such as within the Loyal Heights and Upper Fremont (NW Seattle), Wedgwood and Sand Point Way (NE Seattle), Magnolia and Nickerson (Queen Anne/Magnolia), Montlake, Madrona, and Squire Park (Capitol Hill/Central District), Alki, North Delridge/Youngstown, and Gatewood (W Seattle), and Georgetown (Duwamish) neighborhood centers.

Impacts to cultural resources could occur under Alternative 2 as a result of alteration, demolition, damage, or destruction. In addition, development under Alternative 2 could increase the probability of inadvertent discovery of below-ground archaeological and cultural resources as compared to Alternative 1, No Action, because of substantial foundation work needed for multi-story buildings. Alternative 2 includes no additional protections or planning improvements to account for impacts to cultural resources. Additionally, some allowed adaptive reuse projects could impact historic-period architectural resources by allowing for inappropriate alterations, changes, additions, and loss of character-defining features and historic building materials that could diminish the building's ability to qualify as a designated SL or for listing in the NRHP.

130th/145th Station Area

In the 130th/145th Station Area, Alternative 2 would designate three neighborhood centers near 130th Street and Roosevelt Way, 125th Street and 15th Avenue, and 145th Street and 15th Avenue, clustering denser, taller buildings and growth near transit. These neighborhood centers would include a mix of low-rise residential, mid-rise residential, and neighborhood commercial (NC3), which includes commercial, office, multi-story mixed use, and residential building types, with no size limits for most commercial uses. Development would be more mixed-use near the 145th Station Area (with NC3) compared to Alternative 1. Building heights would be allowed up to 75 feet. The area would see 2,208 new housing units and 979 new jobs. Development projects under Alternative 2 could affect cultural resources, with such impacts as alteration, demolition, damage, or destruction.

Impacts of Alternative 3: Broad

Alternative 3 allows a wider range of low-scale housing options, such as detached and attached homes (duplexes, triplexes and fourplexes), as well as three-story stacked flats such as sixplexes on larger lots in all NR zones across the city. A three-story height limit will continue to apply to market-rate development in these areas; however, the City will also study potential height, floor area, or density incentives for affordable housing projects. Existing regional centers (previously urban centers) and urban centers (previously urban villages) would gain

up to 80,000 housing units, while the urban neighborhood areas would see up to 20,000 additional housing units in new housing types. Additionally, the distribution of jobs and commercial space may shift toward existing urban neighborhood areas to reflect local demand. The City will also consider allowing more flexibility for commercial space in these areas, such as corner stores, or easing the way for at-home businesses.

Alternative 3 includes some areas of zoning change such as increased or altered boundaries of urban centers, which could incentivize development to increase floor area and height limits allowing construction of dense multi-story buildings. Most residential growth under Alternative 3 would be in regional centers and neighborhood centers (low displacement risk), with most growth located in areas 2 (NE Seattle), 4 (Downtown/Lake Union), and 1 (NW Seattle). As described in the Affected Environment and mapped in **Exhibit 3.9-1,** growth will occur in the areas that contain or abut listed historic properties or recorded archaeological resources, or contain mapped resources sensitivity areas (e.g., High to Very High Risk of archaeological and cultural sensitivity) in NR zones across the city. Insufficient formal survey and inventory has been undertaken in many of the NR zones across the city, leaving broad swaths of historic-period single-family and small-scale multi-family residential buildings as-yet unidentified or evaluated, and thus vulnerable to impacts from development.

As described in the Affected Environment and mapped in **Exhibit 3.9-1,** there are designated SLs, NRHP- and WHR-listed properties and mapped resources sensitivity areas (e.g., High to Very High Risk of archaeological and cultural sensitivity) across the city within the NR zones (previously NR zones), such as Dunn Gardens (NRHP-listed) (NW Seattle), James and Pat Chiarelli House (designated SL and NRHP-listed) and the Julian and Marajane Barksdale House (NRHP-listed) (NE Seattle), Fort Lawton Landmark District (designated SL) (Queen Anne/Magnolia), Harvard-Belmont Historic District (designated SL and NRHP-listed) and Frink Park (NRHP-listed) (Capitol Hill/Central District), Schmitz Park Bridge (designated SL and NRHP-listed) (W Seattle), and Joseph Kraus House (designated SL and NRHP-listed) (SE Seattle).

Impacts to cultural resources could occur under Alternative 3 as a result of alteration, demolition, damage, or destruction. In addition, development under Alternative 3 could increase the probability of inadvertent discovery of below ground archaeological and cultural resources as compared to Alternative 1, No Action, because of substantial foundation work needed for multi-story buildings. Alternative 3 includes no additional protections or planning improvements to account for impacts to cultural resources. Additionally, some allowed adaptive reuse projects could impact historic-period architectural resources by allowing for inappropriate alterations, changes, additions, and loss of character-defining features and historic building materials that could diminish the building's ability to qualify as a designated SL or for listing in the NRHP.

130th/145th Station Area

In the 130th/145th Station Area, Alternative 3 would develop based on the citywide framework. Current regional centers and urban centers would remain in the study area with more flexibility in urban neighborhood areas for "missing middle" housing and small areas of commercial/residential. As with other alternatives, development projects under Alternative 3 could affect cultural resources, with such impacts as alteration, demolition, damage, or destruction. Alternative 3 includes no additional protections or improvements in planning for consideration of impacts to cultural resources.

Impacts of Alternative 4: Corridor

Alternative 4 will allow a wider range of housing options than other action alternatives but only in corridors**,** which can focus growth near transit, shops, large parks, and services. Under this alternative, corridors include about half the areas currently zoned NR. Within corridors, this alternative would allow a variety of housing options including detached homes, duplexes, triplexes, fourplexes, sixplexes/3-story stacked flats, townhouses/rowhouses, and up to 5-story apartments. The proposed corridors also include some areas currently zoned for multifamily and commercial development that could allow increases in building height. Existing regional centers (previously urban centers) and urban centers (previously urban villages)would gain up to 80,000 housing units, while the corridors would see up to 20,000 additional housing units in new housing types. Additionally, the distribution of jobs and commercial space may shift toward transit corridors to correspond with the location of housing growth.

Alternative 4 focuses residential growth along corridors in close proximity to transit stations, commercial and retail spaces, parks, and services, and includes some areas of zoning change such as increased or altered boundaries for urban centers, which could incentivize development to increase floor area and height limits, allowing construction of dense multi-story buildings. Most residential growth under Alternative 4 would be in urban centers and corridors, with most growth located in areas 2 (NE Seattle), 4 (Downtown/Lake Union), and 1 (NW Seattle). As described in the Affected Environment and mapped in **Exhibit 3.9-1,** growth will occur in the areas that contain or abut listed historic properties or recorded archaeological resources, or contain mapped resources sensitivity areas (e.g., High to Very High Risk of archaeological and cultural sensitivity), possibly impacting such cultural resources as the John B. Allen School (designated SL and NRHP-listed) and the Christ the King Catholic Church (CIR) (NW Seattle), the Bryant Elementary School (designated SL) and the Henry Owen Shuey House (designated SL and NRHP-listed) (NE Seattle), Magnolia Public Library (designated SL and NRHP-listed) and the (former) Seventh Church of Christ (designated SL) (Magnolia/Queen Anne), Samuel Hyde House (designated SL and NRHP-listed), Volunteer Park (designated SL and NRHP-listed), Millionaire's Row Historic District (NRHP-listed), Moore Mansion and Bordeaux House (designated SLs) (Capitol Hill/Central District), Fauntleroy Community Church and YMCA (designated SL) (W Seattle), Hat 'n Boots (designated SL) (Duwamish), and Van

Asselt School and Old Fire Station #33 (designated SLs), Ota Residence (CIR), and the Jimmie and Betty Eng House (NRHP-listed) (SE Seattle).

Impacts to cultural resources could occur under Alternative 4 as a result of alteration, demolition, damage, or destruction. In addition, development under Alternative 4 could increase the probability of inadvertent discovery of below ground archaeological and cultural resources as compared to Alternative 1, No Action, because of substantial foundation work needed for multi-story buildings. Alternative 4 includes no additional protections or planning improvements to account for impacts to cultural resources. Additionally, some allowed adaptive reuse projects could impact historic-period architectural resources by allowing for inappropriate alterations, changes, additions, and loss of character-defining features and historic building materials that could diminish the building's ability to qualify as a designated SL or for listing in the NRHP.

130th/145th Station Area

The station areas would develop based on the citywide framework. As with other alternatives, development projects under Alternative 4 could affect cultural resources, with such impacts as alteration, demolition, damage, or destruction. As described in the Affected Environment and mapped in **Exhibit 3.9-1,** growth will occur in the corridors that contain or abut listed historic properties or recorded archaeological resources, or contain mapped resources sensitivity areas (e.g., High to Very High Risk of archaeological and cultural sensitivity), possibly impacting such cultural resources as Ingraham High School (designated SL). Alternative 4 includes no additional protections or improvements in planning for consideration of impacts to cultural resources.

Impacts of Alternative 5: Combined

Alternative 5 will allow the largest increase in supply and diversity of housing throughout the city, similar to the Preferred Alternative. It combines the strategies in Alternatives 2, 3, and 4, and expands the boundaries of the city's existing regional centers (previously urban centers) and urban centers (previously urban villages), such as Admiral, Greenwood–Phinney Ridge, Morgan Junction, and Upper Queen Anne. Alternative 5 would change the place type designations of Ballard from an urban center (previously urban village) to a regional center (previously urban center), giving the area a greater share of residential and job growth. Additionally, under Alternative 5, the NE 130th Street Station Area would be redesignated as an urban center resulting in a larger share of residential and job growth. Regional centers (previously urban centers) and urban centers (previously urban villages) including Northgate, Crown Hill, Othello, Rainier Beach, South Park, and Westwood–Highland Park, would be studied for potential growth. Existing regional centers and urban centers would gain up to 80,000 housing units, while other areas would see up to 40,000 additional housing units in new housing types. Additionally, the distribution of jobs and commercial space would be a combination of the other alternatives and may shift toward transit corridors to correspond with the location of housing growth.

Alternative 5 applies the proposed land-use concepts of ~~all~~ alternatives 2-4, which could incentivize development to increase floor area and height limits, allowing for the construction of dense, multi-story buildings. Most residential growth under Alternative 5 would be in regional centers, residential urban centers, and neighborhood centers (low displacement risk), with most growth located in areas 2 (NE Seattle), 1 (NW Seattle), 4 (Downtown/Lake Union), and 5 (Capitol Hill/Central District). As described in the Affected Environment and mapped in **Exhibit 3.9-1,** growth under Alternative 5 will occur in the areas that contain or abut listed historic properties or recorded archaeological resources, or contain mapped resources sensitivity areas (e.g., High to Very High Risk of archaeological and cultural sensitivity), such as within the neighborhood centers (previously neighborhood anchors) of Upper Fremont (NW Seattle), Ravenna (NE Seattle), Squire Park (Capitol Hill/Central District), Alki and Gatewood (W Seattle), and Georgetown (Duwamish), and within the neighborhoods of Loyal Heights, Phinney, and Wallingford (NW Seattle), Haller Lake, Ravenna, and Sandpoint (NE Seattle), Ft. Lawton, Magnolia, and Queen Anne (Magnolia/Queen Anne), Capitol Hill, Montlake, Washington Park, Madrona, Central District, and Leschi (Capitol Hill/Central District), Delridge, Lincoln Park, and Fauntleroy Park (W Seattle), Georgetown (Duwamish), and Mount Baker, Beacon Hill, Columbia, South Beacon Hill, Seward Park, and Rainier Beach (SE Seattle). Impacts to cultural resources could occur under Alternative 5 as a result of alteration, demolition, damage, or destruction. In addition, development under Alternative 5 could increase the probability of inadvertent discovery of below ground archaeological and cultural resources as compared to Alternative 1, No Action, because of substantial foundation work needed for multi-story buildings. Additionally, some allowed adaptive reuse projects could impact historic-period architectural resources by allowing for inappropriate alterations, changes, additions, and loss of character-defining features and historic building materials that could diminish the building's ability to qualify as a designated SL or for listing in the NRHP.

130th/145th Station Area

In the 130th/145th Station Area, Alternative 5 would create an expansive urban center (previously urban village) at the Sound Transit light rail station along both sides of I-5, with zoning including low-rise residential, mid-rise multifamily, and neighborhood commercial (NC2 and NC3), linking Pinehurst's existing commercial area to an expanded residential/mixed-use area near the station. Development would be denser than Alternative 2, with more mixed-use, retail, and commercial buildings, and a wider variety of housing types. Building heights in the urban center would be allowed up to 95 feet, while in the nodes and corridors, building heights could be up to 80 feet. The urban center at NE 130th Street would see the highest residential growth of up to 1,644 housing units, while the neighborhood center at 145th Street and 15th Avenue would receive up to 1,059 housing units. The Station Area would see up to a total of 1,004 new jobs. As with other alternatives, development projects under Alternative 5 could affect cultural resources, with such impacts as alteration, demolition, damage, or destruction. As described in the Affected Environment and mapped in **Exhibit 3.9-1,** growth will occur in the areas that contain or abut listed historic properties or recorded archaeological resources, or contain mapped resources sensitivity areas (e.g., Moderately Low to High Risk of archaeological and cultural sensitivity),

possibly impacting such cultural resources as Ingraham High School, Lake City School, or Lake City Library (designated SLs). Alternative 5 includes no additional protections or improvements in planning for consideration of impacts to cultural resources.

Impacts of Preferred Alternative

Note: The impacts analysis for the Preferred Alternative was added since the Draft EIS.

The Preferred Alternative combines the strategies of all the action alternatives and includes the Mayor's Recommended Growth Strategy contained in the new One Seattle Comprehensive Plan, resulting in growth similar to Alternative 5. The Preferred Alternative will allow the largest increase in supply and diversity of housing throughout the city with 120,000 new residences and job growth of 158,000 new jobs, along with Alternative 5. Similar to Alternative 5, the Preferred Alternative would designate Ballard as a regional center giving the area a greater share of residential and job growth. The Preferred Alternative would expand boundaries at new light rail stations, such as Squire Park, and in other small centers, and would expand the boundaries of the city's existing regional centers (previously urban centers) such as First Hill/Capitol Hill Regional Center and 23rd & Union–Jackson Urban Center, and urban centers (previously urban villages), such as Admiral, Greenwood–Phinney Ridge, Morgan Junction, and Upper Queen Anne. Like Alternatives 2 and 5, the Preferred Alternative will create five new neighborhood centers including North Magnolia, High Point, Mid Beacon Hill, Upper Fremont, and Hillman City. South Park is redesignated to a neighborhood center under the Preferred Alternative. Urban Neighborhoods, a new place type will include a mix of low- to moderate-density housing and commercial development along arterials with access to transit. Existing regional centers and urban centers would gain up to 80,000 housing units, while other areas would see up to 40,000 additional housing units in new housing types. Additionally, the distribution of jobs and commercial space would be a combination of the other alternatives and may shift toward transit corridors to correspond with the location of housing growth.

Like Alternative 5, the Preferred Alternative applies the land-use concepts of all alternatives, which could incentivize development with increased floor area and building heights, allowing for the construction of dense, multi-story buildings. Most residential growth under the Preferred Alternative would be in regional centers, residential urban centers, and neighborhood centers (low displacement risk), with most growth located in North Seattle in Areas 1 (NW Seattle) and 2 (NE Seattle), followed by Area 4 (Downtown/South Lake Union), and then Area 5 (Capitol Hill/Central District). As noted in Alternative 5 above and described in the Affected Environment and mapped in **Exhibit 3.9-1,** growth under the Preferred Alternative will occur in areas that contain or abut listed historic properties or recorded archaeological resources, or contain mapped resources sensitivity areas (e.g., High to Very High Risk of archaeological and cultural sensitivity), such as within the neighborhood centers (previously neighborhood anchors) of Upper Fremont and Loyal Heights (NW Seattle), Ravenna, Wedgwood and Sandpoint Way (NE Seattle), Squire Park (Capitol Hill/Central District), Alki and Gatewood (W Seattle), and Georgetown (Duwamish), and within the neighborhoods of Loyal Heights, Phinney, and Wallingford (NW Seattle), Haller Lake, Ravenna,

and Sandpoint (NE Seattle), Ft. Lawton, Magnolia, and Queen Anne (Magnolia/Queen Anne), Capitol Hill, Montlake, Washington Park, Madrona, Central District, and Leschi (Capitol Hill/Central District), Delridge, Lincoln Park, and Fauntleroy Park (W Seattle), and Mount Baker, Beacon Hill, Columbia, South Beacon Hill, Seward Park, and Rainier Beach (SE Seattle). Impacts to cultural resources could occur under the Preferred Alternative as a result of alteration, demolition, damage, or destruction. In addition, development under the Preferred Alternative could increase the probability of inadvertent discovery of below ground archaeological and cultural resources as compared to Alternative 1, No Action, because of substantial foundation work needed for multi-story buildings. Additionally, some allowed adaptive reuse projects could impact historic-period architectural resources by allowing for inappropriate alterations, changes, additions, and loss of character-defining features and historic building materials that could diminish the building's ability to qualify as a designated SL or for listing in the NRHP.

130th/145th Station Area

In the 130th/145th Station Area, the Preferred Alternative, like Alternative 5, would create a large urban center (previously urban village) along both sides of I-5 at the NE 130th Street Light Rail Station area, with zoning that includes low-rise residential, mid-rise residential, and neighborhood commercial (NC2 and NC3). Under the Preferred Alternative, this urban center would see the highest residential and job growth. The 145th Station Area would be designated as a neighborhood center and would see similar zoning, growth in housing units, and somewhat less job growth. The neighborhood center would link Pinehurst's existing commercial area to an expanded residential/mixed-use area near the station. Under the Preferred Alternative, development would be dense, with the greatest increase in housing and job growth in the 130th Station Area urban area, and with slightly fewer jobs in the 145th Station Area Neighborhood Center. Building heights in the urban center would be allowed up to 95 feet, while in the nodes and corridors, building heights could be up to 80 feet. The urban center at NE 130th Street would see residential growth of up to 1,500 housing units and 360 new jobs, while the neighborhood center at 145th Street and 15th Avenue would receive up to 652 housing units and 298 new jobs. As with other alternatives, development projects under the Preferred Alternative could affect cultural resources, with such impacts as alteration, demolition, damage, or destruction. As described in the Affected Environment and mapped in **Exhibit 3.9-1**, growth will occur in the areas that contain or abut listed historic properties or recorded archaeological resources, or contain mapped resources sensitivity areas (e.g., Moderately Low to High Risk of archaeological and cultural sensitivity), possibly impacting such cultural resources as Ingraham High School, Lake City School, or Lake City Library (designated SLs). The Preferred Alternative includes no additional protections or improvements in planning for consideration of impacts to cultural resources.

3.9.3 Mitigation Measures

Incorporated Plan Features

The action alternatives are designed to incorporate some land-use concepts that may help to mitigate adverse impacts to cultural resources, such as updates to land-use policies to anticipate future innovations and trends that may incentivize adaptive reuse of historic-period architectural resources.

Regulations & Commitments

Projects implemented under the Comprehensive Plan and development regulations evaluated in this EIS may be required to comply with a number of federal, state, and local regulations, including the National Historic Preservation Act of 1966, as amended; Archaeological Resources Protection Act of 1979; National American Graves Protection and Repatriation Act; National Environmental Protection Act of 1969, as amended; Washington Executive Order 21-02 (formerly 05-05); or the Washington State Environmental Protection Act. Additionally, the City of Seattle, the state of Washington, and the United States government all maintain lists of historic properties.

For projects that may adversely impact or affect historic properties listed in or eligible for listing in the NRHP, additional public coordination and consultation with DAHP, area Tribes, and other consulting parties may be required. Such coordination could include mitigation.

Federal

Federal regulations that guide cultural resource management activities include the following:

- National Historic Preservation Act (NHPA) of 1966, as amended, commonly referred to as Section 106, has implementing regulations (36 CFR Part 800), that require federal agencies (or others who have received federal grants or funds, or a federal permit or license) to take into account the effects of their undertakings on historic properties, by identifying historic properties, assessing adverse effects, and resolving those adverse effects.
  - The NHPA authorized the NRHP as the program to coordinate and support the Act. To be considered a historic property, a resource must be determined eligible for listing in the NRHP by meeting at least one of the four established Criteria of Evaluation and retaining sufficient integrity to express significance.
  - The NHL program functions to honor historic properties that are nationally and exceptionally significant in American history and culture. Properties must meet one of six NHL Criteria and possess a high degree of integrity.
- Archaeological Resources Protection Act (ARPA) of 1979 protects archaeological resources.
- National American Graves Protection and Repatriation Act (NAGPRA) creates protections for Native American burial sites, remains, and cultural objects.

- The National Environmental Protection Act (NEPA) of 1969, as amended, requires federal agencies to assess whether a major federal action has the potential to significantly affect the human environment prior to making decisions. This is done through the preparation of an Environmental Assessment (EA) or an EIS.

State

Washington state regulations that guide cultural resource management activities include the following:

- Washington Executive Order 21-02 (formerly 05-05) requires that impacts to cultural resources must be considered as part of any state-funded project or investment and must include consultation with DAHP and with Tribal governments.
- Washington State Environmental Policy~~rotection~~ Act (SEPA) has a process to identify and analyze environmental impacts to cultural resources associated with governmental decisions such as issuing permits, constructing public facilities, or adopting regulations, policies, and plans. This is accomplished through the SEPA Checklist.
- Washington State Archaeological Sites and Resources Protection Act (RCW 27.53) requires a permit to excavate or remove any archaeological resource located on public or Tribal lands.
- Registration of Historic Archaeological Resources on State-Owned Aquatic Lands (25-46 WAC) establishes to establish registration procedures for previously unreported historic archaeological resources discovered on, in, or under state-owned aquatic lands as provided for in Chapter 27.53 RCW.
- The WHR is an official state listing of significant sites and properties and is administered by DAHP. The list is honorary and the effects of listing in the WHR are parallel to the NRHP. Properties listed in the NRHP are automatically listed in the WHR.
- The WHBR honors the barns of the State that are historically significant. Administered by DAHP, the heritage barn designation allows the property owners access to matching grant funds (RCW 27.34.400).

Local

The City of Seattle also maintains city ordinances and city-run programs that guide cultural resource management activities within city boundaries. These include:

- City of Seattle's Historic Preservation Program, through the SL program, protects designated landmark sites, buildings, structures, objects, and districts city wide. Protections of designated landmarks are provided by design review of proposed alterations and the issuance of a Certificate of Approval (SMC 25.12). Owners of properties that have received Seattle Landmark designation may take advantage of City incentives including a Special Tax Valuation, Zoning Code Relief, Building Code Relief, and special incentives for downtown landmarks, such as the transfer of development rights (TDR).
- Seattle's Municipal Code (SMC) 25.05 Environmental Policies and Procedures, subsection 25.05.675.H provides Historic Preservation policies for the protection of historic buildings,

special historic districts, and sites of archaeological significance that are found within Seattle, but that are not yet designated Seattle Landmarks.

- The policy describes special historic districts that were established to protect their unique historical and cultural significance. These districts are subject to development controls and project review by special district review boards.
- The policy also includes a limited list of mitigation measures. Additionally, under SMC 25.05.675.P.2.b.i, the policy provides protection for Public View of historic landmarks designated by the Landmarks Preservation Board that, that, because of their prominence of location or contrasts of siting, age, or scale, are visual features of their neighborhood or the city, and contribute to the distinctive quality or identity of their neighborhood or the city.

Potential Mitigation Measures

Some examples of avoidance or mitigation for impacts for architectural resources, might include:

- Modifying demolition review process so that historic review occurs even if SEPA thresholds are increased.
- Reusing buildings instead of demolition;
- Preparing DAHP Level I (Historic American Building Survey/Historic American Engineering Record [HABS/HAER]) Documentation;
- Preparing DAHP Level II Documentation for submission to local archives and libraries;
- Prioritizing historic properties when the City funds seismic retrofits for Unreinforced Masonry (URM) buildings;
- Developing cultural landscape contexts, including within historically marginalized communities;
- Preparing histories of the area prioritizing Indigenous perspectives; the City could work with Tribes and others to develop context statements;
- Funding the collection of oral histories from within the historically marginalized communities and creating a repository for them;
- Funding City-initiated, community-led thematic historic context survey and inventory projects that focus on marginalized or underrepresented immigrant communities and preparing thematic context statements relating to those resources;
- Including development incentives for the preservation of architectural resources including adaptive reuse projects. These may include exemptions from the floor area ration calculation, or flexibility for allowable uses within the structure; such adaptive reuse projects should follow the *Secretary of the Interior Standards for Rehabilitation,* or the City should develop new rehabilitation guidelines for adaptive reuse;

Mitigation for adverse impacts to archaeological or cultural resources, could include:

- Prior to commencing site-specific subsurface investigations of soils, notifying the local Indigenous Tribes so an archaeologist can observe the work;
- Funding survey and inventory of archaeological sites.

- Updating tree removal requirements for archaeological sites.
- Employing standard archaeological techniques such as archaeological testing, excavation and data recovery/collection of artifacts, documentation, analysis, sharing evidence with the local Indigenous Tribes, and archiving, possibly in a repository for future research;
- Funding public education and outreach, including interpretive signage and/or a museum exhibit;
- Funding interpretive signage and educational programs for BIPOC communities' historic neighborhoods; or
- Funding development of digital and other media content, including film, to share holistic stories of the impacted resource(s).

The development of a preservation action plan for Seattle's lands affected by rising sea levels and erosion could help to protect the city's resources located near the waterfront and in riverine or low-lying areas. The plan could include vulnerability/risk assessment tools/mapping (that communities could use to assess climate vulnerability/risks to their significant historic and cultural resources), performance indicator tools (to see how historic structures would perform during intense storms), and resilience guidance (a "roadmap" to advise how to create/increase resilience of particular building types) (O'Donnell 2022). Another helpful tool for Seattle's historic property owners could be the development of a publicly accessible website for resilience treatments and strategies for building components/materials and landscapes (O'Donnell 2022; UTSA 2022).

Additionally, the City could consider broadening the historic and cultural resources consideration section of the Seattle All-Hazards Mitigation Plan (HMP) to utilize the aforementioned preservation action plan. Mitigation Goal 4 of the HMP states, "Protect the natural environment and cultural and historic resources," with the stated action for cultural resources as "promote mitigation of historic buildings and key cultural assets" (OEM 2016:6-2, 6-8). By determining which areas of the city are likely to be vulnerable to extreme storms and sea-level rise, survey and inventory of historic and cultural resources should be performed within those areas, and a mitigation plan developed following Federal Emergency Management Agency (FEMA) guidance in *Integrating Historic Property and Cultural Resource Considerations Into Hazard Mitigation Planning* (FEMA 2005).

3.9.4 Significant Unavoidable Adverse Impacts

All the alternatives have the potential for significant adverse impacts to cultural resources in the analysis areas. Such impacts can include physical alteration, damage, or destruction of all or part of a resource; alteration of the characteristics of the surrounding environment that contribute to the property's significance; and the introduction of visual or audible elements that are out of character with the property. Such impacts could alter the characteristics of a historic property in such a way as to diminish its integrity, thus affecting its eligibility to qualify for inclusion in the SL or NRHP.

Advanced planning to eliminate, minimize, or avoid impacts to cultural resources would improve outcomes under all the alternatives. If elimination, minimization, or avoidance is impracticable, mitigation should be implemented by coordinating with the area's Tribes, the lead agency, and all other stakeholders and consulting parties in accordance with DAHP Mitigation Options and Documentation Standards, and the City of Seattle's Historic Preservation policies. The ultimate outcome of such mitigation is to moderate or substantially lessen the adverse impacts to cultural resources before they are lost or significantly altered. With the implementation of advanced planning or mitigation, significant adverse impacts to cultural resources can be avoided or minimized.

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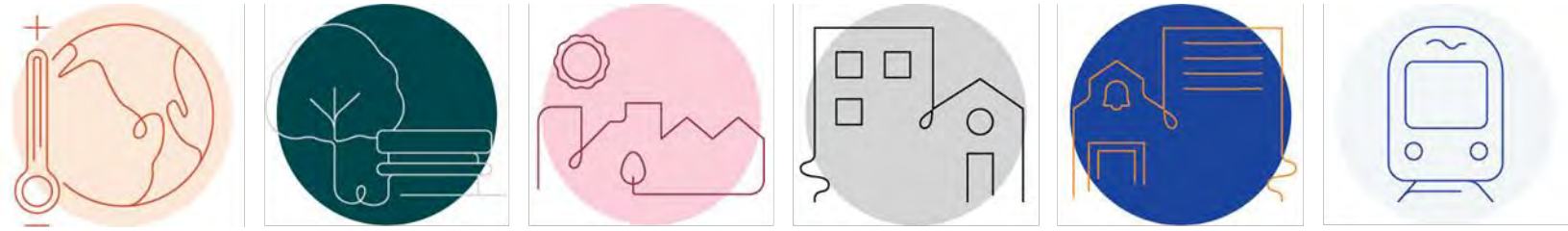
3.10 Transportation



Source: City of Seattle, 2023.

The transportation section provides a multimodal analysis of transportation in Seattle to evaluate the potential impacts of the proposed land use alternatives. This section discusses the current transportation conditions in addition to future conditions under the alternatives. Further detail on each alternative can be found in **Chapter 2**.

Transportation impacts are identified under each alternative, as appropriate. Although not individually modeled, the potential impacts of Alternative 4 are expected to fall between the other action alternatives due to the overall magnitude of growth and pattern of density. The citywide growth total for Alternative 4 is equivalent to Alternative 2 and Alternative 3, while Alternative 5 and the Preferred Alternative have higher growth. The pattern of growth assumed in Alternative 4 falls between the more concentrated growth of Alternative 2 and more dispersed growth of Alternative 3.

Thresholds of significance utilized in this impact analysis are defined in **Section 3.10.2 Impacts**. Additionally, potential strategies to mitigate adverse impacts are discussed.

3.10.1 Affected Environment

This section presents existing transportation conditions throughout the City of Seattle for all modes as well as the current performance of the transportation network and methodologies used to quantitatively evaluate the current system. Evaluations address people walking and biking, transit, autos, freight, and safety. The geographies used for analysis depend on the metric. Some evaluation metrics are performed for each of the eight EIS analysis subareas shown in **Exhibit 3.10-1**: Northwest Seattle, Northeast Seattle, Queen Anne/Magnolia, Downtown/Lake Union, Capitol Hill/Central District, West Seattle, Duwamish, and Southeast Seattle. These analysis subareas are used to describe how transportation conditions vary throughout the city.

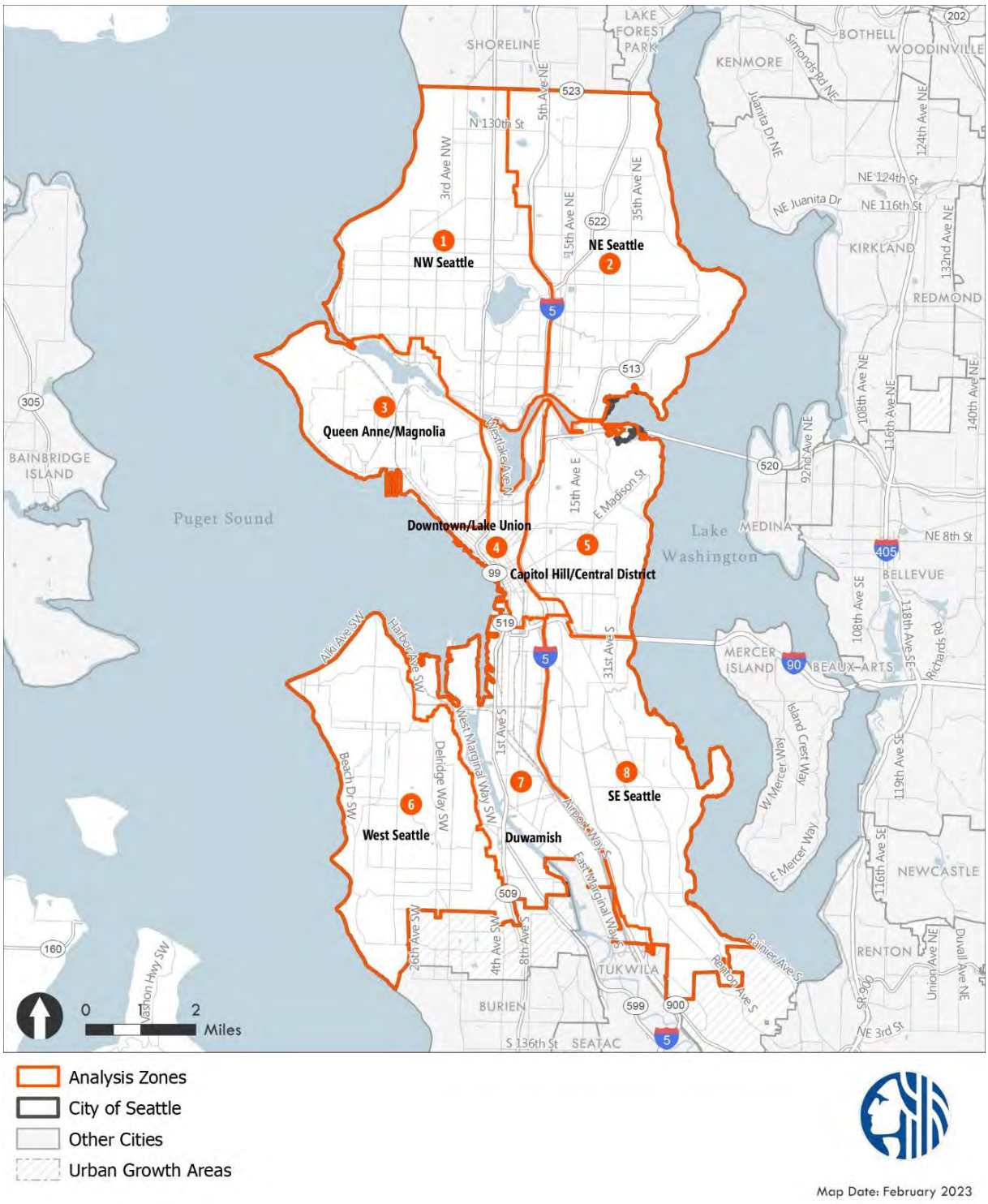
Data & Methods

This section describes the methodology used to evaluate impacts across scenarios. The following metrics are included as part of the evaluation:

- Mode share by subarea
- Person trips by mode
- Sidewalk network completion
- Access to All Ages and Abilities bicycle network
- Transit capacity analysis
- Vehicle Miles Traveled (VMT), Vehicle Hours Traveled (VHT), and average trip speed
- Corridor travel time
- Volume-to-Capacity across screenlines
- Intersection LOS in the NE 130th/NE 145th Street Subarea
- State facility capacity analysis

Each metric is used to quantitatively evaluate and contextualize impacts. The following sections describe the data sources and procedures for calculating each analysis metric.

Exhibit 3.10-1. EIS Analysis Subareas



Sources: City of Seattle, 2022.

Data Collection Period

This EIS considers two time periods for analysis: 2019 as the baseline of existing conditions and 2044 as a horizon year at which the outcomes of the alternatives are compared. Beginning in March 2020, the COVID-19 pandemic disrupted longstanding commute patterns and broader travel trends. In the same month, the closure of the West Seattle Bridge fundamentally changed local travel patterns through a large portion of the city until the bridge's reopening in September 2022. For these reasons, 2019 was selected as a more representative year for baseline travel conditions. Selecting 2019 as the base year also provides a more conservative assumption (i.e., a baseline with more traffic congestion) with respect to identifying potential impacts of the alternatives because growth is assumed to be additive to existing conditions.

Puget Sound Regional Council (PSRC) Travel Model

Puget Sound Regional Council (PSRC) built a travel demand model for the Puget Sound Region called SoundCast designed to evaluate future travel behavior and inform land use planning. The model covers the four-county region for which PSRC is the metropolitan planning organization: King, Kitsap, Snohomish, and Pierce counties. Therefore, the model provides an inherently cumulative evaluation of travel behavior that accounts for not only Seattle, but also the transportation networks and land uses in neighboring jurisdictions. SoundCast is an activity-based model which estimates travel behavior across the region based on characteristics of individual persons and their households. The model produces detailed trip diaries for each simulated person in the region throughout an average weekday tracking the departure time, starting location, ending location, travel mode, and any other people sharing that trip.

This model was used to evaluate trip patterns under each of the analyzed alternatives. Alternative 4 was not modeled due to its similarities to other alternatives; see discussion of Alternative 4 under **Section 3.10.2 Impacts**. SoundCast incorporates household and employment forecasts for each future year alternative within the EIS. PSRC regional assumptions are maintained for areas outside of Seattle city boundaries. Transportation facilities that ~~will~~ are expected to be in place by the horizon year 2044 are also incorporated into the future year model network. The model and user guide are available at psrc.org.

As noted above, travel patterns have substantively changed over the past several years, particularly related to commute trips as an increasing number of people work from home at least part of the time. The PSRC model is rooted in the travel patterns observed through its periodic regional household travel surveys and therefore reflects the more traditional commute patterns that occurred before the COVID-19 pandemic. While there is considerable uncertainty about how travel patterns will evolve in the coming years, the PSRC travel model is the best available tool to evaluate the future year alternatives. The model is best used to ~~3.10-4~~identify relative differences among alternatives rather than provide a specific prediction of the exact location and magnitude of impacts, particularly given this is a programmatic EIS.

Single Occupancy Vehicle (SOV) Mode Share by Subarea

Using PSRC household travel survey data for 2017 and 2019, existing single occupancy vehicle (SOV) mode share has been compiled based on the eight analysis subareas defined in the *Seattle 2035* Comprehensive Plan. **Exhibit 3.10-1** shows the eight EIS analysis subareas: (1) Northwest Seattle, (2) Northeast Seattle, (3) Queen Anne/Magnolia, (4) Downtown/Lake Union, (5) Capitol Hill/Central District, (6) West Seattle, (7) Duwamish, and (8) Southeast Seattle. For future conditions, the PSRC regional travel demand model is used to estimate the change in SOV mode share relative to these observed values.

~~As part of the One Seattle Comprehensive Plan update~~In the next several years, the City is proposing to replace the existing LOS standards, based on SOV mode share, with new multimodal LOS standards for locally owned arterials, locally and regionally operated transit routes, and active transportation facilities.

SOV mode share targets as defined in the *Seattle 2035* Comprehensive Plan are summarized in **Exhibit 3.10-2**.

Exhibit 3.10-2. Single Occupancy Vehicle (SOV) Mode Share Target by Subarea

Subarea	2035 Target
(1) Northwest Seattle	37%
(2) Northeast Seattle	35%
(3) Queen Anne/Magnolia	38%
(4) Downtown/Lake Union	18%
(5) Capitol Hill/Central District	28%
(6) West Seattle	35%
(7) Duwamish	51%
(8) Southeast Seattle	38%

Source: *Seattle 2035* Comprehensive Plan, Transportation Appendix, 2020.

Person Trips by Mode

Person trips by mode ~~will be~~is estimated at the citywide level as well as by EIS analysis subarea. This metric ~~will be~~is calculated for both the existing and future year evaluation using the PSRC regional travel demand model.

Sidewalk Network Completion

Using ArcGIS Pro, the pedestrian network is evaluated based on the percentage of sidewalk complete. The analysis uses sidewalk data from SDOT's ArcOnline Assets App. The percentage of sidewalk complete is calculated as the total sidewalk length divided by twice the length of centerline miles (i.e., defining 100% completion as sidewalks on both sides of every roadway).

These statistics are then aggregated at the census tract level to display the levels of sidewalk network completion throughout the city.

Access to All Ages and Abilities Bicycle Network

ArcGIS Pro ~~was~~ is used to estimate the number of people and jobs within ¼ mile of an All Ages & Abilities bicycle facility, which includes off-street trails, cycle tracks (protected bike lanes), and neighborhood greenways. The analysis uses bicycle facility data from the SDOT ArcOnline Assets App.

Transit Capacity Analysis

Transit boarding data has been summarized by route to evaluate the extent to which crowding occurs on each route. The average maximum load on each route (i.e., the highest number of riders using a bus or train at one time) is compared to the transit agency crowding threshold to determine the number of trips over the crowding threshold. The crowding threshold is set by the agency depending on the vehicle type and is based on the number of seats and standing room available to riders. The analysis evaluates each route's inbound and outbound direction and considers the PM peak period. For future conditions, the PSRC regional travel demand model, SoundCast, is used to forecast the change in ridership on the following routes: Link light rail, RapidRide bus, and those routes that were identified as exceeding the crowding threshold under existing conditions.

VMT / VHT / Average Trip Speed

The PSRC regional travel demand model provides estimates of daily vehicle miles traveled (VMT) and vehicle hours traveled (VHT) for both existing and future conditions. These metrics are reported both in total and relative to the total service population (number of residents and workers within the city) for each alternative. The methodology for VMT and VHT includes all trips with at least one end in Seattle and made by cars and trucks. Bus travel is not included as the number of bus trips is assumed to be the same across all future year alternatives. In addition, the ratio of VMT to VHT is reported; this metric represents the average speed of trips made by Seattle residents and workers.

Travel Time

Travel time along major city arterials is used as a performance measure because it addresses the fundamental concern of most travelers—the time it takes to move within and through the city. These travel times speak to mobility for autos, freight, and transit that all share space along these corridors. To assess existing conditions, PM peak hour travel times were analyzed using September through November 2019 data from SDOT's Iteris travel time data platform. The PM peak period represents the overall peak of traffic volumes during the day though some types of travel activity may peak at other times (for example, freight travel tends to peak during the morning and midday hours).

As noted in the **Data & Methods** section, using 2019 as the base year represents a period when traffic congestion was at its peak. Travel times decreased substantially during the pandemic as typical travel patterns were disrupted, remote work became more common, and traffic congestion decreased. Over the past several years, travel times have continued to increase toward pre-pandemic levels as traffic volumes have rebounded but peak period travel times are still generally below those experienced in 2019.

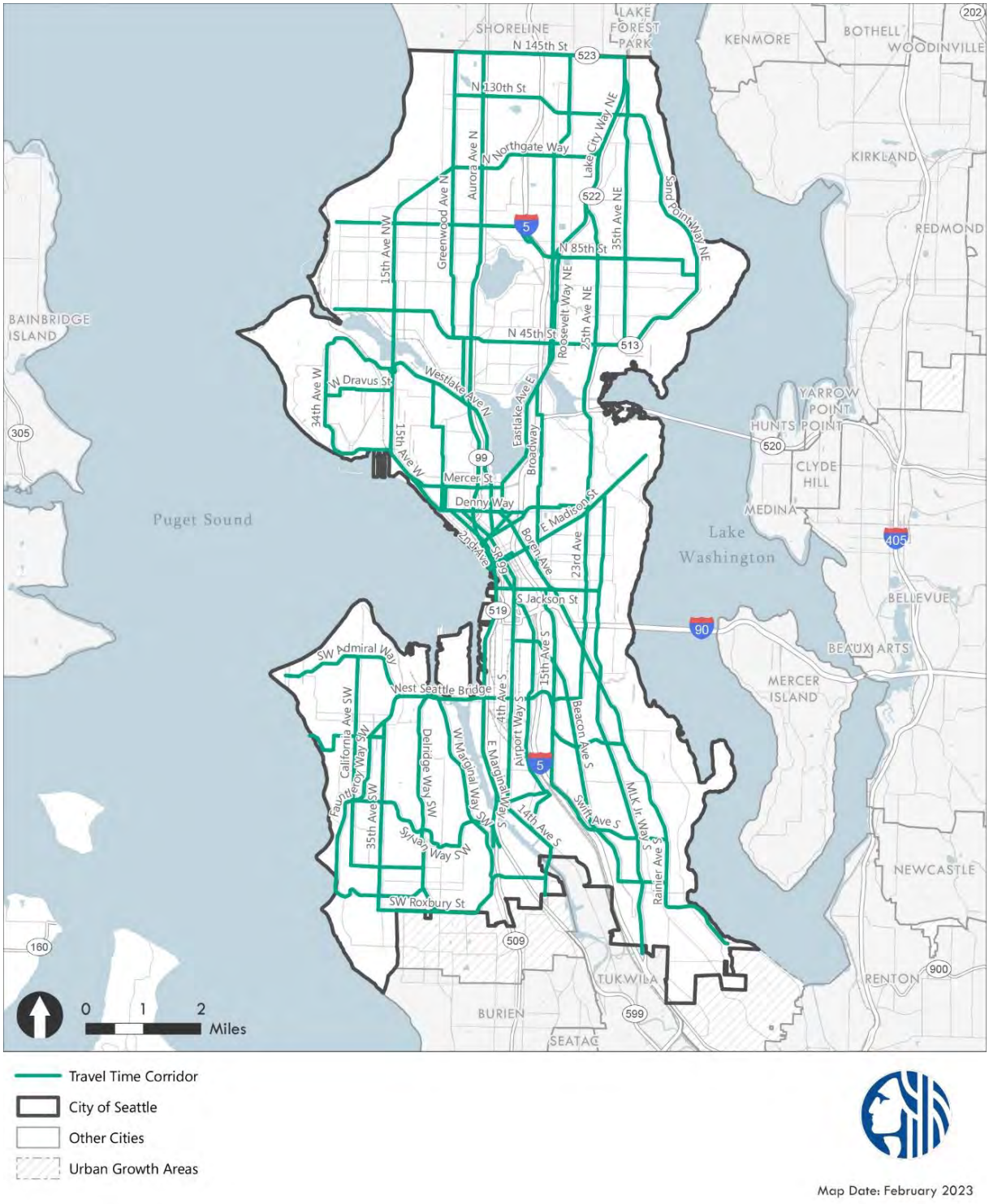
The concept of level of service (LOS) is used to describe traffic operations by assigning a letter grade of A through F, where A represents free-flow conditions, B represents free-flow conditions with some restrictions in lane changes, C is near free-flow conditions with a heavier flow, D is an unstable flow with minor queuing, E represents unstable flow with potentially extended queuing, and F represents highly congested conditions. This study uses concepts from the 7th Edition of the Highway Capacity Manual (HCM) to define thresholds for each LOS grade, as shown in **Exhibit 3.10-3.** The thresholds represent the ratio between observed travel time and free-flow travel time (i.e., at the speed limit). For example, a vehicle traveling at half the free-flow speed will have a travel time twice that of the free-flow travel time, which equates to the breakpoint between LOS C and LOS D. Because most city arterials include frequent signalized intersections or other traffic control, corridors in Seattle's urban environment tend to have travel times well below the overall speed limit of a corridor. The LOS values for the travel time study corridors in **Exhibit 3.10-4** utilize the thresholds described in **Exhibit 3.10-3**.

Exhibit 3.10-3. LOS Thresholds for Travel Speeds and Travel Time

	LOS A	LOS B	LOS C	LOS D	LOS E	LOS F
Threshold for Ratio of PM Peak Hour Travel Time to Travel Time at Free-Flow Speed	<1.25	<1.5	<2.0	<2.5	<3.0	≥3.0

Source: Highway Capacity Manual, 7th Edition, 2022.

Exhibit 3.10-4. Travel Time Corridors



Source: Fehr & Peers, 2023.

Screenlines

Seattle defines "screenlines" as one way to evaluate traffic conditions for autos, freight, and transit. A screenline is an imaginary line across which the number of passing vehicles is counted. Each designated screenline has a threshold in the form of a volume-to-capacity (V/C) ratio which is defined as the number of vehicles crossing the screenline compared to the capacity of the roadways crossing the screenline. This EIS evaluates 42 screenlines during the PM peak hour. **Exhibit 3.10-5** and **Exhibit 3.10-6** summarize the location of each screenline, as well as its threshold as designated in the *Seattle 2035* Comprehensive Plan. As shown in the map, there are screenlines along the north and south city limits to allow analysis of how the alternatives would affect traffic levels in neighboring jurisdictions. See the **State Facilities** sections for analysis of the SR 520 and I-90 facilities which indicate how the alternatives would affect traffic levels in communities across Lake Washington.

Thirty of the screenlines have performance thresholds defined while the remaining twelve (beginning with the letter A) provide supplemental information about performance in Seattle's regional centers but do not have specific performance thresholds defined.

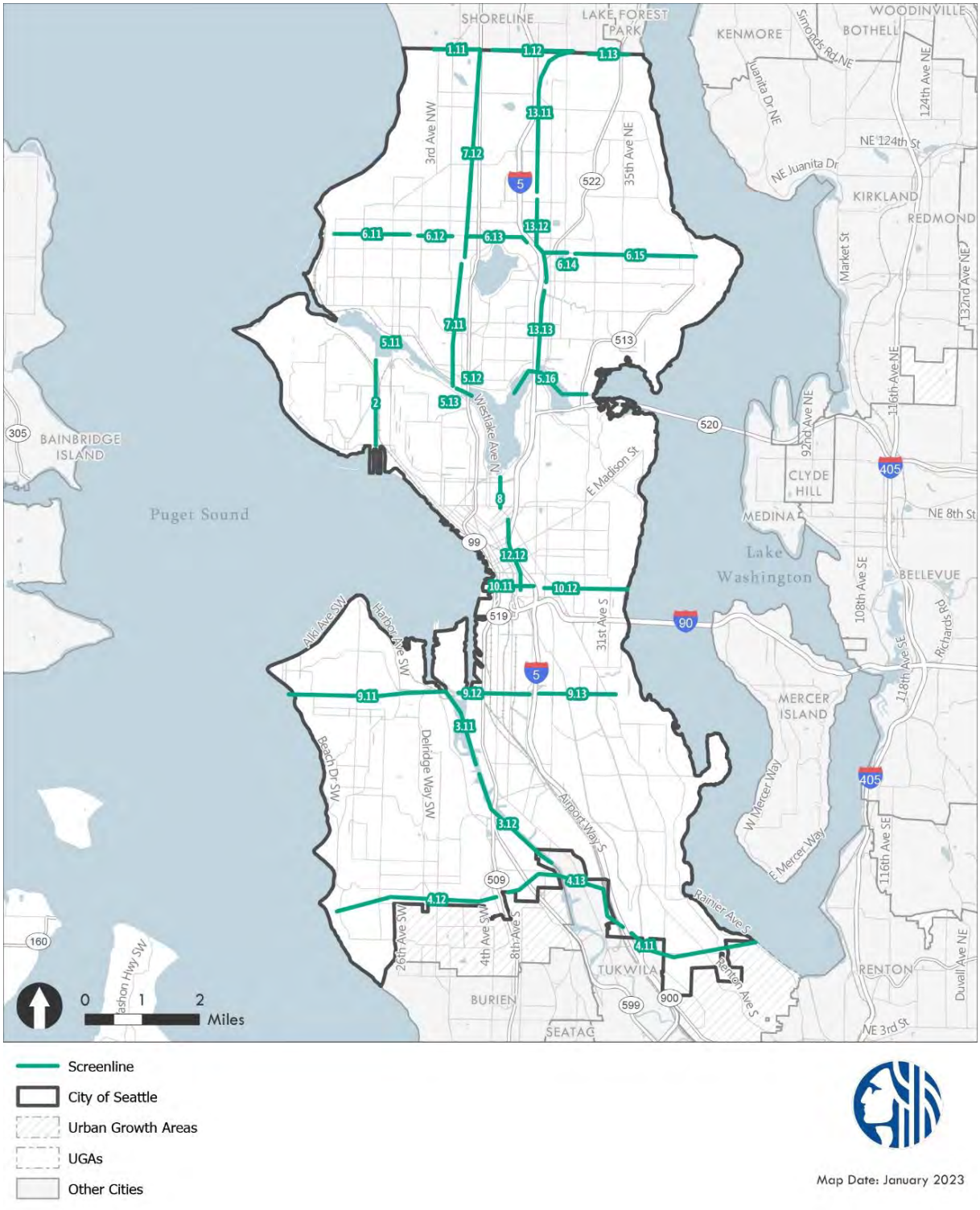
Exhibit 3.10-5. Screenline Locations and Volume-to-Capacity Thresholds

Screenline #	Screenline Location	Extents	V/C Threshold
1.11	North City Limit	3rd Ave NW to Aurora Ave N	1.20
1.12	North City Limit	Meridian Ave N to 15th Ave NE	1.20
1.13	North City Limit	30th Ave NE to Lake City Way NE	1.20
2.00	Magnolia	Magnolia Bridge to W Emerson Place	1.00
3.11	Duwamish River	West Seattle Bridge & Spokane St	1.20
3.12	Duwamish River	1st Ave S & 16th Ave S	1.20
4.11	South City Limit	Martin Luther King Jr. Way to Rainier Ave S	1.00
4.12	South City Limit	Marine Dr SW to Meyers Way S	1.00
4.13	South City Limit	SR 99 to Airport Way S	1.00
5.11	Ship Canal	Ballard Bridge	1.20
5.12	Ship Canal	Fremont Bridge	1.20
5.13	Ship Canal	Aurora Ave Bridge	1.20
5.16	Ship Canal	University & Montlake Bridges	1.20
6.11	South of NW 80th St	Seaview Ave NW to 15th Ave NW	1.00
6.12	South of N(W) 80th St	8th Ave NW to Greenwood Ave N	1.00
6.13	South of N(E) 80th St	Linden Ave N to 1st Ave NE	1.00
6.14	South of NE 80th St	5th Ave NE to 15th Ave NE	1.00
6.15	South of NE 80th St	20th Ave NE to Sand Point Way NE	1.00

Screenline #	Screenline Location	Extents	V/C Threshold
7.11	West of Aurora Ave	Fremont Pl N to N 65th St	1.00
7.12	West of Aurora Ave	N 80th St to N 145th St	1.00
8.00	South of Lake Union	Valley St to Denny Way	1.20
9.11	South of Spokane St	Beach Dr SW to W Marginal Way SW	1.00
9.12	South of Spokane St	E Marginal Way S to Airport Way S	1.00
9.13	South of Spokane St	15th Ave S to Rainier Ave S	1.00
10.11	South of S Jackson St	Alaskan Way S to 4th Ave S	1.00
10.12	South of S Jackson St	12th Ave S to Lakeside Ave S	1.00
12.12	East of CBD	S Jackson St to Howell St	1.20
13.11	East of I-5	NE Northgate Way to NE 145th St	1.00
13.12	East of I-5	NE 65th St to NE 80th St	1.00
13.3	East of I-5	NE Pacific St to NE Ravenna Blvd	1.00
A1	North of Seneca St	1st Ave to 6th Ave	N/A
A2	North of Blanchard	Elliott Ave to Westlake Ave	N/A
A3	East of 9th Ave	Lenora St to Pike St	N/A
A4	South of Mercer St	Elliott Ave W to Aurora Ave N	N/A
A5	East of 5th Ave N	Denny Way to Valley St	N/A
A6	North of Pine St	Melrose Ave E to 15th Ave E	N/A
A7	North of James St– E Cherry St	Boren Ave to 14th Ave	N/A
A8	West of Broadway	Yesler Way to E Roy St	N/A
A9	South of NE 45th St	7th Ave NE to Montlake Blvd NE	N/A
A10	East of 15th Ave NE	NE 45th St to NE 52nd St	N/A
A11	South of Northgate Way (N/NE 110th St)	N Northgate Way to Roosevelt Way NE	N/A
A12	East of 1st Ave NE	NE 100th St to NE Northgate Way	N/A

Source: *Seattle 2035* Comprehensive Plan, Transportation Appendix, 2020.

Exhibit 3.10-6. Screenline Map



Source: *Seattle 2035* Comprehensive Plan, Transportation Appendix, 2020.

Intersection Level of Service (LOS) Analysis—130th /145th Street Subarea

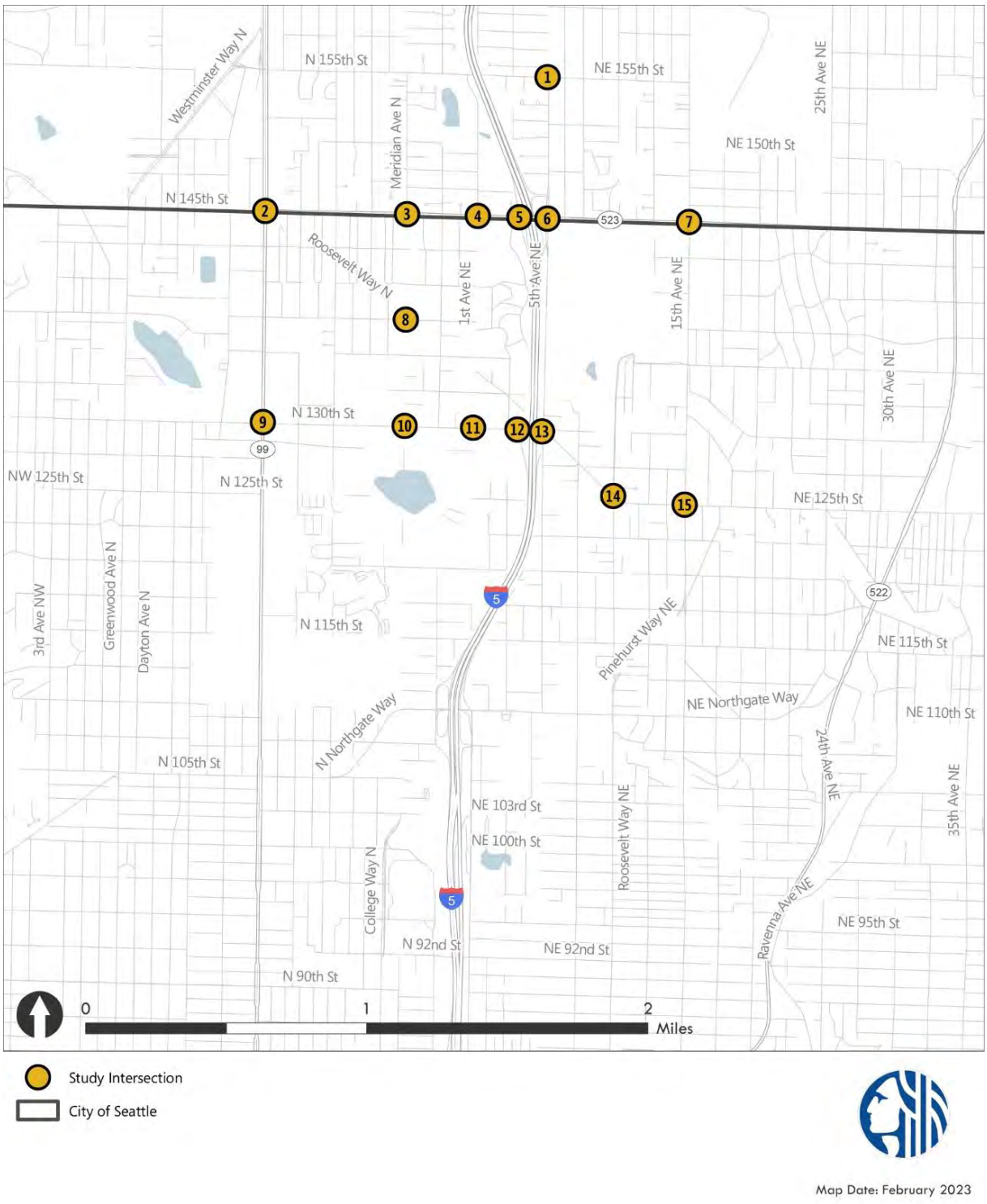
In addition to reviewing conditions and impacts citywide, this EIS also provides a focused review of the 130th and 145th Street Station Area Plan and options for the City to streamline future environmental review in that area. Therefore, this subarea is reviewed in greater detail, including intersection level of service (LOS) within the 130th/145th Street subarea surrounding the planned Link light rail stations. Study intersections were selected to cover the roughly quarter-mile to half-mile area around the stations and focus on arterial intersections that are most likely to see traffic volume changes due to growth in the area. This includes seven intersections within or along the city limit with Shoreline to capture potential effects to that neighboring jurisdiction. Average delay experienced at each intersection is estimated based on the volumes, lane configuration, and traffic control at each study intersection. **Exhibit 3.10-7** lists the 15 study intersections within the 130th/145th Street study area (mapped in **Exhibit 3.10-8**).

Exhibit 3.10-7. 130th/145th Street Subarea Study Intersections

Intersection ID	Intersection	Traffic Control
1	NE 155th St / 5th Ave NE	Signal
2	N 145th St / Aurora Ave N	Signal
3	N 145th St / Meridian Ave N	Signal
4	N 145th St / 1st Ave NE	Signal
5	NE 145th St / I-5 On & Off Ramps	Signal
6	NE 145th St / 5th Ave NE	Signal
7	NE 145th St / 15th Ave NE	Signal
8	N 137th St / Meridian Ave N / Roosevelt Way N	All-way Stop Control
9	N 130th St / Aurora Ave N	Signal
10	N 130th St / Meridian Ave N	Signal
11	N 130th St / 1st Ave NE	Signal
12	NE 130th St / I-5 On Ramp	Free / Yield
13	NE 130th St / Roosevelt Way NE / 5th Ave NE	Signal
14	Roosevelt Way NE / NE 125th St / 10th Ave NE	Signal
15	NE 125th St / 15th Ave NE	Signal

Source: Fehr & Peers, 2023.

Exhibit 3.10-8. 130th/145th Subarea Study Intersections Map



Sources: Fehr & Peers, 2023.

Intersection LOS is measured using a scale that ranges from LOS A (which represents minimal delay) to LOS F (which represents high delay and substantial congestion) as defined by the Highway Capacity Manual (Transportation Research Board, 2022). **Exhibit 3.10-9** displays the range of delays corresponding to each LOS grade. For signalized intersections and all-way stop intersections, the average delay is calculated as the average of all vehicles passing through a given intersection (i.e., on all approaches of the intersection). For side-street stop sign controlled intersections, the average delay and LOS are reported for the worst minor street movement. All study intersections are analyzed for the PM peak hour using Synchro software. For this EIS analysis, signalized intersections operating at LOS E or F and unsignalized intersections operating at LOS F are considered to be operating below acceptable levels.

Exhibit 3.10-9. Level of Service (LOS) and Delay Thresholds

LOS	Signalized Intersections Delay per Vehicle (seconds)	Unsignalized Intersections Delay per Vehicle (seconds)
A	≤ 10	≤ 10
B	> 10 to 20	> 10 to 15
C	> 20 to 35	> 15 to 25
D	> 35 to 55	> 25 to 35
E	> 55 to 80	> 35 to 50
F	> 80	> 50

Source: Transportation Research Board, 2022.

PM peak hour turning movement volumes were compiled for each study intersection. Most counts were collected during the 2016 to 2019 timeframe to reflect the pre-pandemic period with the exception of several counts collected in late 2022. Future year volumes were forecasted by applying the growth predicted by the PSRC regional travel demand model for each alternative to the observed counts.

State Facilities

State facilities (roadways owned by WSDOT) are also evaluated using the volume-to-capacity and LOS concepts. For this EIS analysis, capacities are defined using a set of tables developed by the Florida Department of Transportation (FDOT) based on Highway Capacity Manual methodologies. Capacities for this analysis are based on the characteristics of the roadway including number of lanes, presence of auxiliary lanes, and presence of ramp metering. Pre-pandemic (2019) annual average weekday traffic volumes were compiled from WSDOT's Traffic Count Database System. The results are summarized using Level of Service (LOS) designations A-F. WSDOT sets the standard for most of its facilities in Seattle at LOS D; the exception is the segment of SR 99 between SR 509 and I-5 which has a standard of "E mitigated" meaning congestion should be mitigated when PM peak hour LOS falls below LOS E. Future year volumes were forecasted by applying the growth predicted by the PSRC regional travel demand model for each alternative to the observed counts.

Current Policy & Regulatory Frameworks

Relevant policies related to transportation in Seattle are summarized below. At the time of Draft EIS publication, Tthe City of Seattle hads a 10-year strategic plan outlined in Move Seattle (2015) along with master plans specifically addressing pedestrians, bicycles, transit, and freight. and is currently developingSince the publication of the Draft EIS in March 2024, the City adopted a new citywide multimodal transportation plan as described at right. Seattle also has master plans specifically addressing pedestrians, bicycles, transit, and freight. More detailed information is available in the specified documents described in this section.

VISION 2050

VISION 2050, adopted in 2020, is the region's plan for how it will prepare for growth and meet goals including a healthy environment, thriving communities, and a strong economy. It also includes the region's multicounty planning policies which are adopted under the state's Growth Management Act. These policies guide Seattle's approach to growth as it develops its local comprehensive plan. The PSRC also released its 2022-2050 Regional Transportation Plan (RTP) which is a multimodal plan for the four-county region (King, Snohomish, Kitsap, and Pierce counties) to coordinate an integrated planning approach among the various jurisdictions in the region. The RTP includes an assessment of current and future transportation conditions and identifies regional projects to be implemented over the planning horizon.

Seattle Transportation Plan

As described here and in the Draft EIS, the City has previously adopted citywide modal plans for pedestrian, bicycle, transit, and freight travel. Since the publication of the Draft EIS in March 2024, SDOT is currently engaging in a process to createadopted a unified, multimodal Seattle Transportation Plan (STP) that will integrates the City's modal network visions into a single, holistic transportation plan.

A separate EIS was completed for the STP. The same No Action Alternative network assumptions are were used in both the Comprehensive Plan Draft EIS and STP EISs. The Comprehensive Plan Draft EIS assumes the No Action network is in place for all alternatives and tests varying land use alternatives. The STP EIS assumes Comprehensive Plan Alternative 5 land use growth and tests different network alternatives.

For the Comprehensive Plan Final EIS, the network maps, policy direction, and candidate projects from the adopted STP have been incorporated into an updated model of the No Action Alternative and Preferred Alternative networks.

Seattle Transportation Plan

The Seattle Transportation Plan (STP) was adopted in April 2024. The STP has six overarching goals: safety; equity; sustainability; mobility and economic vitality; livability; and maintenance and modernization. The STP outlines strategies and actions the City can take to reach each of those goals. The STP brings the City's previous modal plans (described later in this section) together into one vision for transportation in Seattle, but does include modal elements for transit; freight and urban goods; bicycle and e-mobility; pedestrian; people streets and public

spaces; vehicle; new and emerging mobility; and curbside management. The STP also includes a list of potential large capital projects that could be implemented to increase the capacity to move people and make the transportation system more efficient.

Pedestrian Master Plan

The Pedestrian Master Plan (PMP) envisions Seattle as the most walkable and accessible city in the nation.[65] To achieve that vision, the following goals are identified:

- Reduce the number and severity of crashes involving pedestrians;
- Develop a connected pedestrian environment that sustains healthy communities and supports a vibrant economy;
- Make Seattle a more walkable city for all through public engagement, service delivery, accessibility, and capital investments that promote equity; and
- Get more people moving to improve health and increase mobility.

The plan documents existing pedestrian facilities and defines a Priority Investment Network to guide future funding. SDOT publishes implementation plan reports every one to two years to update the public on its progress toward implementing PMP projects and meeting the identified performance measures.

Bicycle Master Plan

The Seattle Bicycle Master Plan (BMP) provides guidance on future investments in bicycle facilities in Seattle, with a vision for bicycling as a safe and convenient mode for people of all ages and abilities on a daily basis.[66] The plan identifies the following goals:

- Increase the amount and mode share of bicycle riding in Seattle for all trip purposes;
- Improve safety for bicycle riders in Seattle;
- Create a high-quality bicycle network that connects to places people want to go and provides a time-competitive travel option;
- Improve bicycle riding for all through equity in public engagement, program delivery, and capital investments; and
- Build vibrant communities by creating a welcoming environment for bicycle riding.

The document describes the existing network and over 400 miles of planned future network for the city. Strategies for end-of-trip facilities, programs, maintenance, project prioritization, and funding are included. SDOT publishes reports every one to two years to update the public on its progress toward implementing BMP projects and meeting the identified performance measures.

[65] Seattle Department of Transportation. 2017. "Pedestrian Master Plan." https://www.seattle.gov/documents/Departments/SDOT/About/DocumentLibrary/SeattlePedestrianMasterPlan.pdf
[66] Seattle Department of Transportation. 2014. "Bicycle Master Plan." https://www.seattle.gov/documents/Departments/SDOT/About/DocumentLibrary/BicycleMasterPlan/SBMP_21March_FINAL_full%20doc.pdf

Transit Master Plan

The Transit Master Plan (TMP) is a 20-year plan that outlines the needs to meet Seattle's transit demand through 2030.[67] It prioritizes capital investment to create frequent transit services that meet the most pressing needs of residents and workers. It outlines the high priority transit corridors and the preferred modes along each corridor. This document specifies capital projects to improve speed and reliability. Goals include:

- Meet sustainability, growth management and economic development goals;
- Make it easier and more desirable to take transit;
- Respond to needs of transit-reliant populations;
- Create great places where modes connect; and
- Advance implementation within constraints.

The elements of the document include policies and programs, transit corridors and service, access and connections to transit, and funding and performance monitoring.

Freight Master Plan

The Freight Master Plan (FMP) was adopted by the City in 2016.[68] Its purpose is to ensure efficient and predictable goods movement in the region to promote economic activity and international trade. This planning document is especially important for the two designated manufacturing and industrial centers, the Ballard-Interbay-Northend Manufacturing Industrial Center (BINMIC) and Greater Duwamish MIC, and the Port of Seattle. The FMP analyzes the current freight facilities and their ability to accommodate future freight growth and overlays the truck street system with other modal systems with the goal of facilitating better understanding of the potential for modal conflicts. The plan identifies six main goals with a total of 92 actions that address economy, safety, mobility, state of good repair, equity, and the environment in an effort to create a comprehensive freight network. The six overarching goals are as follows:

- Provide a freight network that supports a thriving and diverse economy for Seattle and the region;
- Improve the safety and the predictable movement of goods and people;
- Reliably connect manufacturing/industrial centers and business districts within the Seattle, regional, and international freight networks;
- Maintain and improve the freight transportation network to ensure safe and efficient operations;
- Benefit residents and businesses of Seattle through equity in freight investments and improve the health of communities impacted by goods movement; and

[67] Seattle Department of Transportation. 2016. "Transit Master Plan." https://www.seattle.gov/documents/Departments/SDOT/TransitProgram/TMPSupplmtALL2-16FINAL.pdf
[68] Seattle Department of Transportation. 2016. "Freight Master Plan." https://www.seattle.gov/documents/Departments/SDOT/About/DocumentLibrary/FMP_Report_2016E.pdf

- Improve freight operations in Seattle and the region by making goods movement more efficient and reducing its environmental footprint.

The plan also includes a list of freight supportive projects with a focus on corridors connecting the City's two MICs to the freeway system and corridors connecting the MICs to one another.

Vision Zero

Seattle has implemented a Vision Zero program, with the goal of zero serious injuries and fatalities on Seattle streets by 2030. Relevant plans include a 2015 Vision Zero Action Plan, 2017 Vision Zero Progress Report, and 2019 Vision Zero Update Report. The Vision Zero plans include equity and climate goals of eliminating racial disparities and reducing the number of personal trips that produce emissions.[69] The City of Seattle is moving forward with the program through the implementation of a wide range of projects and distribution of resources.

New Mobility Playbook

The New Mobility Playbook was published in 2017 to address the rapid changes to the transportation context, including ride-hailing, bike share, scooter share, and car share services.[70] The New Mobility Playbook outlines policies and strategies to guide the City's response to new mobility options while maintaining its commitment to safety, equity, affordability, and sustainability. The document discusses the potential benefits and risks of new mobility and defines five principles intended to drive the City's response to emerging technologies and mobility options:

- Put people and safety first;
- Design for customer dignity and happiness;
- Advance race and social justice;
- Forge a clean mobility future; and
- Keep an even playing field.

The New Mobility Playbook will guide the City's response to changes in transportation such that the implementation of new mobility options align with overall goals and plans.

Move Seattle

In 2015, voters approved a nine-year $930 million levy which replaced a prior levy that expired in 2015. The levy funds are used to implement projects including safety improvements, new facilities, as well as maintenance of existing infrastructure. Move Seattle is a strategic document

[69] Seattle Department of Transportation. "Vision Zero." https://www.seattle.gov/transportation/projects-and-programs/safety-first/vision-zero
[70] Seattle Department of Transportation. 2017. "New Mobility Playbook." https://www.seattle.gov/documents/Departments/SDOT/NewMobilityProgram/NewMobility_Playbook_9.2017.pdf

published in 2015 that guides SDOT's work over the 2016-2024 period with an updated workplan published in 2018.[71] The plan identifies projects within the following categories:

- Safe Routes
  - Vision Zero
  - Pedestrians and Bicyclists
  - Neighborhood Projects
- Maintenance and Repair
  - Arterial Roadway Maintenance
  - Bridges and Structures Maintenance
  - Urban Forest and Drainage
- Congestion Relief
  - Corridor Mobility
  - Light Rail Partnership
  - Pedestrian and Bicycle Improvements
  - Freight Mobility Improvements

SDOT provides annual reports summarizing accomplishments and delivery plans for the coming year as well as a Levy Performance Dashboard so the public can monitor the City's progress in implementing Move Seattle projects.[72] Since the publication of the Draft EIS, Seattle voters approved a $1.55 billion Seattle Transportation Levy which replaces the Levy to Move Seattle. The Seattle Transportation Levy will provide additional funding to SDOT over the next eight years to implement continued improvements.

Transportation Capital Improvement Program

For the 2022 to 2027 period, the Proposed Capital Improvement Program (CIP) plans to invest $1.6 billion on developing, maintaining, and operating Seattle's transportation system. Funded projects include street paving and resurfacing; building new sidewalks and curb ramps; school safety improvements; implementation of the modal plans described above; investments to facilitate freight mobility; traffic cameras and signals; bridge projects such as bridge replacement, maintenance, and seismic retrofitting; and support for the Waterfront Program.[73] Since the publication of the Draft EIS, the City has released its Proposed CIP for the 2025 to 2030 period.[74]

[71] Seattle Department of Transportation. 2018. "Levy to Move Seattle Workplan Report." https://www.seattle.gov/documents/Departments/SDOT/About/Funding/2018_1129_MoveSeattle_WorkPlan_FINAL.pdf
[72] Seattle Department of Transportation. 2022. "Reporting Dashboard: Levy to Move Seattle." https://public.tableau.com/app/profile/city.of.seattle.transportation/viz/Levy_Dashboard_16141242942520/SafeRoutes
[73] Seattle Department of Transportation. 2022. "2022-2027 Proposed Capital Improvement Program." https://www.seattle.gov/documents/Departments/FinanceDepartment/2227proposedcip/SDOT.pdf
[74] Seattle Department of Transportation. 2024. "2025-2030 Proposed Capital Improvement Program." https://seattle.gov/city-budget-office/capital-improvement-program-archives/2025-2030-proposed-cip

Complete Streets

Seattle's Complete Streets ordinance, passed in 2007, directs SDOT to design streets that balance the needs of all roadway users, including pedestrians, bicyclists, transit riders, and people of all abilities, while promoting safe operations for all users, including freight.[75] Design decisions are based on data, such as the adjacent land uses and anticipated future transportation needs. There is no set design template for complete streets as every situation requires a unique balance of design features within the available right-of-way. However, SDOT has developed a Right-of-Way Improvements Manual, called Seattle Streets Illustrated, which helps property owners, developers, engineers, and architects who are involved in the design, permitting, and construction of local streets.[76] Streets Illustrated sets standards for a variety of elements of the public right-of-way including sidewalks, landscaping, bicycle lanes, transit stop amenities, and vehicle lane widths.

Intelligent Transportation Systems (ITS) Strategic Plan

~~For the 2010-2020 period, t~~The Intelligent Transportation Systems (ITS) Strategic Plan provides a 10-year approach for implementing ITS across Seattle.[77] ITS employs electronic and communication technologies on the streets, as well as automated traffic systems, to enhance mobility for all modes by increasing the efficiency and safety of the transportation infrastructure. The goal of the strategic plan is to ensure the existing ITS infrastructure is maintained and preserved, maximize the value of the existing infrastructure, and expand ITS to provide additional geographic coverage and services to travelers.

Neighborhood and Subarea Transportation Planning

The City routinely works with specific communities to plan for needs at the neighborhood level, which can include discussing how to reduce modal conflicts, determine priorities within a local context, and develop design concepts and associated cost estimates. Recent neighborhood transportation planning efforts include:

- One Center City
- Georgetown Mobility Study
- Judkins Park Station Access Study
- Beacon Hill Station Access and Mobility Study
- North Downtown Mobility Study
- Imagine Greater Downtown
- Ballard-Interbay Regional Transportation System

[75] Seattle City Council. 2007. "Ordinance 122386."
http://clerk.ci.seattle.wa.us/search/results?d=CBOR&s1=115861.cbn.&Sect6=HITOFF&l=20&p=1&u=/%7Epublic/cbor2.htm&r=1&f=G
[76] Seattle Department of Transportation. 2022. "Seattle Right-of-Way Improvements Manual: Seattle Streets Illustrated."
https://streetsillustrated.seattle.gov/
[77] Seattle Department of Transportation. 2010. "ITS Strategic Plan."
https://www.seattle.gov/documents/Departments/SDOT/TechnologyProgram/ITSStrategicPlan20102020.pdf

Neighborhood and subarea transportation efforts are undertaken as needed to plan at a finer-grained level and provide cohesive plans for particular geographic focus areas.

Current Conditions

This section describes current transportation conditions for all modes in Seattle: active transportation (people walking, biking, and rolling), transit, autos, and freight. The transportation network is described at various geographies: citywide, neighborhoods and districts, and for the 130th/145th Street subarea in particular. While not exhaustive given the programmatic nature of this EIS, some metrics are evaluated at a more detailed level, for example, subareas of the city or specific key facilities.

SOV Mode Share by Subarea

PM peak single occupancy vehicle (SOV) mode shares by subarea are summarized in **Exhibit 3.10-10**. This data is from the PSRC household travel survey which is a sampling of households to understand typical travel behavior. Because the PSRC household travel survey data sample size is limited at the subarea level, the margin of error ranges from 11% to 28%. The City of Seattle's overall SOV mode share during the PM peak is estimated to be 36%; the margin of error at the city level is approximately 7%. Given the margin of error in this survey, it is difficult to characterize the extent to which mode share is on track to meet the 2035 target.

Exhibit 3.10-10. PM Peak SOV Mode Share by Subarea, 2017-2019

Subarea	2035 SOV Target	2017-2019 Share of Single Occupancy Vehicles
(1) Northwest Seattle	37%	42% (+/- 14%)
(2) Northeast Seattle	35%	35% (+/- 16%)
(3) Queen Anne/Magnolia	38%	42% (+/-25%)
(4) Downtown/Lake Union	18%	24% (+/-11%)
(5) Capitol Hill/Central District	28%	37% (+/-20%)
(6) West Seattle	35%	41% (+/-26%)
(7) Duwamish	51%	72% (+/-28%)
(8) Southeast Seattle	38%	36% (+/-17%)
Citywide	N/A	36% (+/-7%)

Note: Margins of error are based on a 90% confidence interval.
Source: Puget Sound Regional Council Household Survey, 2017-2019.

Person Trips by Mode

Exhibit 3.10-11 summarizes the current estimates of daily person trips in Seattle. Of the roughly 4.1 million daily person trips currently generated in Seattle, SOV trips are estimated to make up 40%. HOV trips are estimated to account for 28%. More than two-thirds of daily trips are made by private vehicle. Transit accounts for 11% of trips, walking for 19%, and biking for 2%.

Exhibit 3.10-11. Daily Person Trips by Mode—Existing Conditions

Mode	Person Trips	Mode Share
SOV	1,624,000	40%
HOV	1,169,000	28%
Transit	465,000	11%
Walk	776,000	19%
Bike	71,000	2%
Total	**4,105,000**	**100%**

Source: Fehr & Peers, 2023.

Active Transportation

The active transportation network is composed of a variety of facility types, some of which serve specific modes while others are shared-use among multiple modes. These include sidewalks, crosswalks, curb ramps, staircases, pedestrian/bicycle bridges, pathways, shared-use trails, protected bike lanes, striped bike lanes, and neighborhood greenways. Detail regarding each active transportation mode has been expanded in the following sections below.

Pedestrian Network

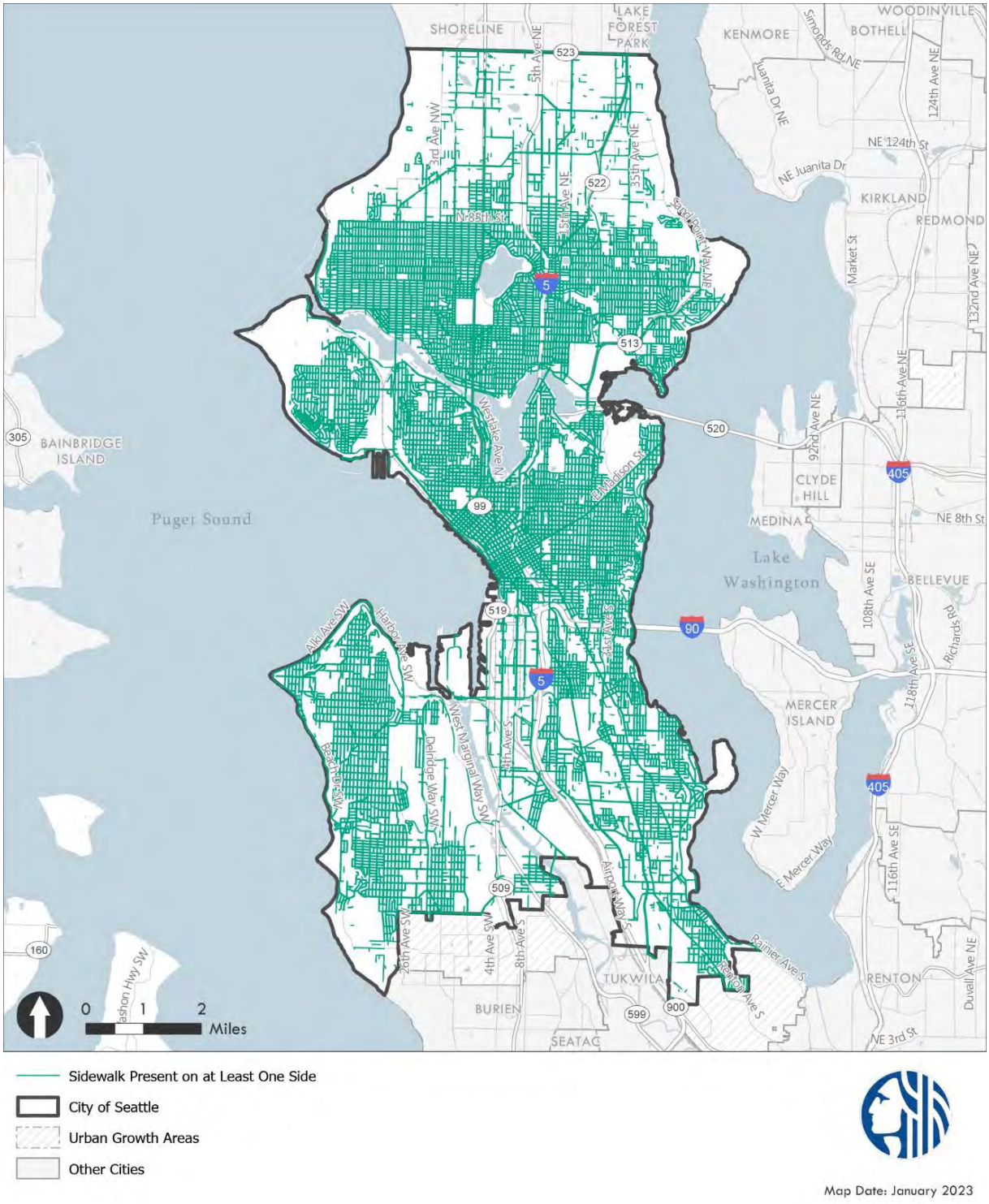
The Seattle pedestrian network is composed of sidewalks, crosswalks, staircases, pedestrian bridges, curb ramps, and trails. Seattle has over 2,000 miles of sidewalks. A map of the sidewalk facilities can be found in **Exhibit 3.10-12**. To view additional datasets related to pedestrian infrastructure, visit the Seattle Accessible Route Planner website. To evaluate the level of sidewalk network connectivity, GIS data was used to calculate the proportion of the sidewalk network that is complete, assuming a fully complete network would have a sidewalk on both sides of each roadway. The information has been summarized at the census tract level to evaluate trends in sidewalk network completion throughout the city. The results are shown in **Exhibit 3.10-13**. For the purposes of the EIS, sidewalk network completion percentages are categorized as follows:

- Low Completion: less than 50% complete
- Medium Completion: between 50% and 75% complete
- High Completion: greater than 75% complete

As shown in **Exhibit 3.10-12** and **Exhibit 3.10-13**, Seattle's pedestrian network is most complete in and around its regional centers and urban centers, including Downtown, South Lake Union, Capitol Hill, Uptown, University District, Northgate, Lake City, Fremont, Ballard, and North Rainier. These areas tend to have uninterrupted sidewalks with frequent pedestrian infrastructure including curb ramps, crosswalks, staircases, and pedestrian bridges.

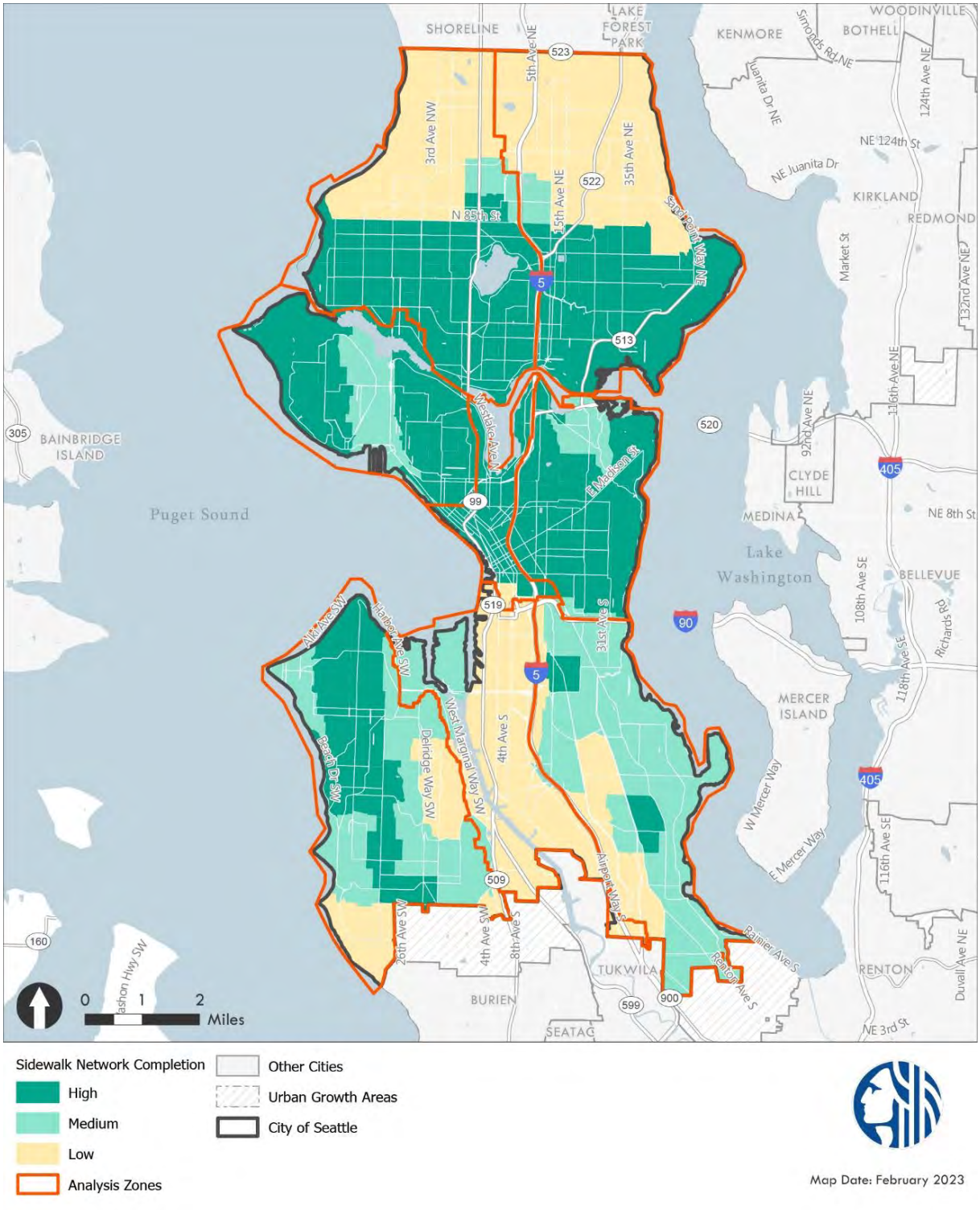
Some areas of the city lack connected networks. Those areas are primarily north of NE/NW 85th Street, Arbor Heights and the Delridge neighborhood in West Seattle, in industrial areas in the Duwamish and Ballard-Interbay MICs, and South Beacon Hill.

Exhibit 3.10-12. Existing Pedestrian Facilities, 2022



Source: Seattle Department of Transportation, 2022.

Exhibit 3.10-13. Existing Sidewalk Connectivity, 2022



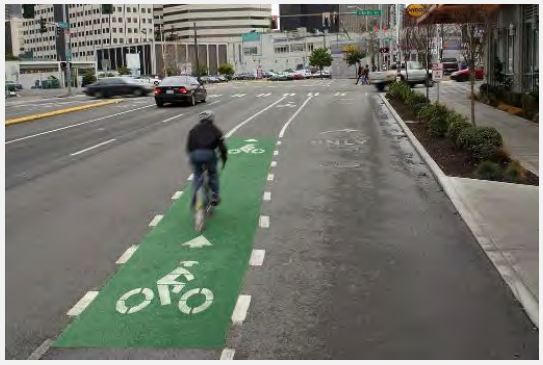
Source: Fehr & Peers analysis of Seattle Department of Transportation data, 2023.

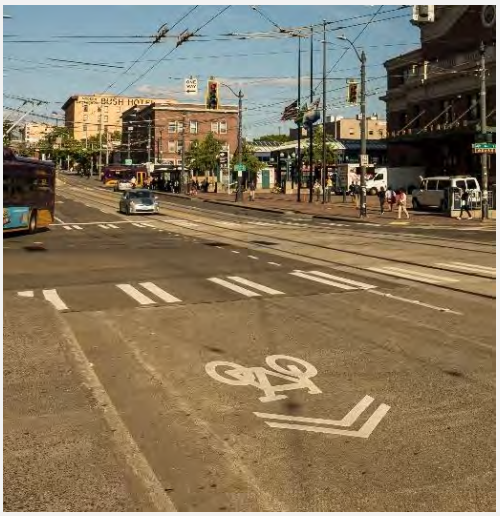
The Seattle Transportation Plan (STP), like the Pedestrian Master Plan (PMP) before it, designated a Priority Investment Network (PIN) to identify locations that are most in need of pedestrian improvements and therefore are the highest priority for investment. The STP identifies three types of PINs: a missing sidewalk PIN, a substandard sidewalk PIN, and an enhanced street crossings PIN. The PIN prioritization criteria include measures related to proximity to land use areas, safety, and equity ~~the following metrics: location within ¼ mile of a K-12 Seattle Public School, location along a Frequent Transit Network arterial, and proximity to Frequent Transit Network stops, and health and equity factors guided by the City's Race and Social Justice goals, and safety factors~~. ~~The maps of the PIN network for each subarea can be found in **Appendix H.1**.~~

Bicycle Network

Seattle aims to provide a connected network of bicycle facilities that serve all ages and abilities by providing a comfortable separation from motor vehicles as well as a focus on intersection safety along those routes. **Exhibit 3.10-14** provides descriptions and images of various types of bicycle facilities. SDOT defines Seattle's All Ages & Abilities network to include off-street trails, cycle tracks, and neighborhood greenways.

Exhibit 3.10-14. Bicycle Facility Type

Facility Type	Description	Example
Bike Lane	A conventional bike lane is a striped lane on a roadway that is designed for exclusive use by people riding bicycles.	
Protected Bike Lane/Cycle Track	Protected bike lanes are separated by vertical elements that provide further protection from motor vehicle traffic. Common vertical elements include vertical curbs, a painted buffer with planter boxes, and parked cars.	

Facility Type	Description	Example
Neighborhood Greenway	Neighborhood Greenways are low-volume and low-speed streets that are designated and designed to give people walking and biking travel priority. They incorporate signage, pavement markings, and traffic calming tools to improve the comfort and connectivity of the bicycle roadway network.	
Off-street Paths & Trails	Off-street paths and trails are shared use, paved facilities for the exclusive use of those who walk, bike, or roll. They are wide enough for two-way travel.	
Sharrow	Sharrows are pavement markings used to indicate a shared lane use for bicycles and vehicles.	

Source: Fehr & Peers, 2023.

Exhibit 3.10-15 displays the citywide bicycle network. The City of Seattle maintains data layers showing many forms of bicycle facilities. To explore the detailed data, the City's interactive GIS database can be accessed here: SDOT Bike Web Map.

Bicycle facilities are spread throughout the city and tend to be most prevalent in regional centers such as the center city area. The areas farthest from downtown, in addition to the Duwamish area, have the lowest access to these facilities. Trails are generally along the water (Lake Washington, Lake Union, Ship Canal, Puget Sound), while neighborhood greenways are predominantly in residential areas.

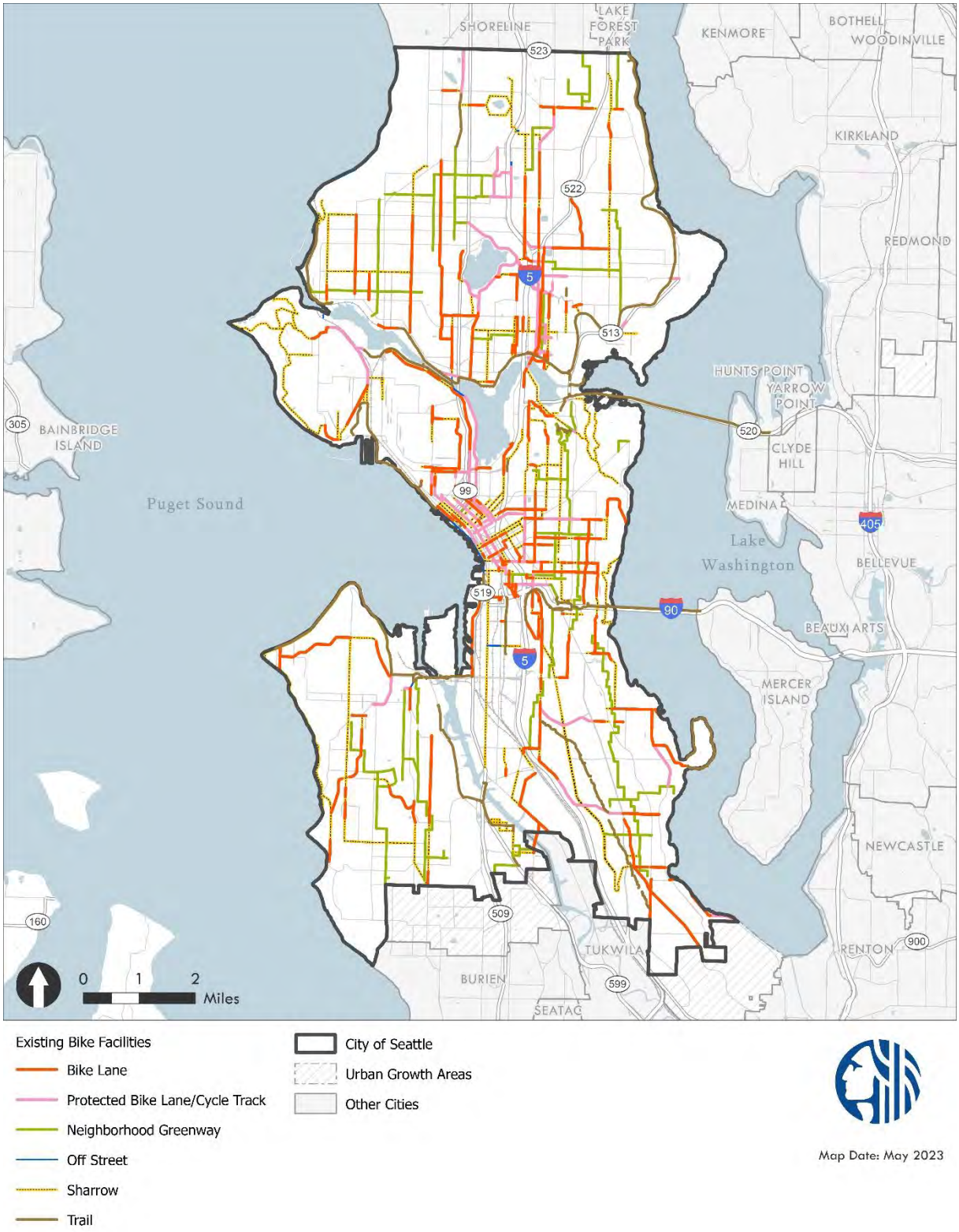
To gauge the current level of access to the All Ages & Abilities bicycle network, **Exhibit 3.10-16** displays the areas of the city within a quarter mile of any All Ages & Abilities facility. Of the approximately 503,000 households in Seattle, 75% (377,000) are within a quarter mile of a designated All Ages & Abilities facility. Approximately 86% of employees are within a quarter mile of an All Ages & Abilities facility. Although most households and employment locations are within a quarter mile of an All Ages & Abilities facility, not all facilities are connected to one another, creating gaps in the network.

~~As part of the City of Seattle's Bicycle Master Plan (BMP), t~~The City regularly produces implementation plans that evaluate the current progress towards overarching goals. This includes data on the 12 bike counters that SDOT maintains throughout Seattle. Four of the counters are also able to capture pedestrian counts.[78] From 2014 to 2019, bike ridership increased by 26%—the locations with the highest ridership were the Fremont Bridge and SW Spokane Street. After several years of increasing ridership, the City of Seattle experienced a decrease in bike ridership at those locations between 2019 and 2020, in line with the COVID-19 pandemic. With the 2020 numbers included, the bicycle ridership rate increased 4% from 2014 to 2020.[79]

[78] Seattle Department of Transportation. "Bike Counters." https://www.seattle.gov/transportation/projects-and-programs/programs/bike-program/bike-counters

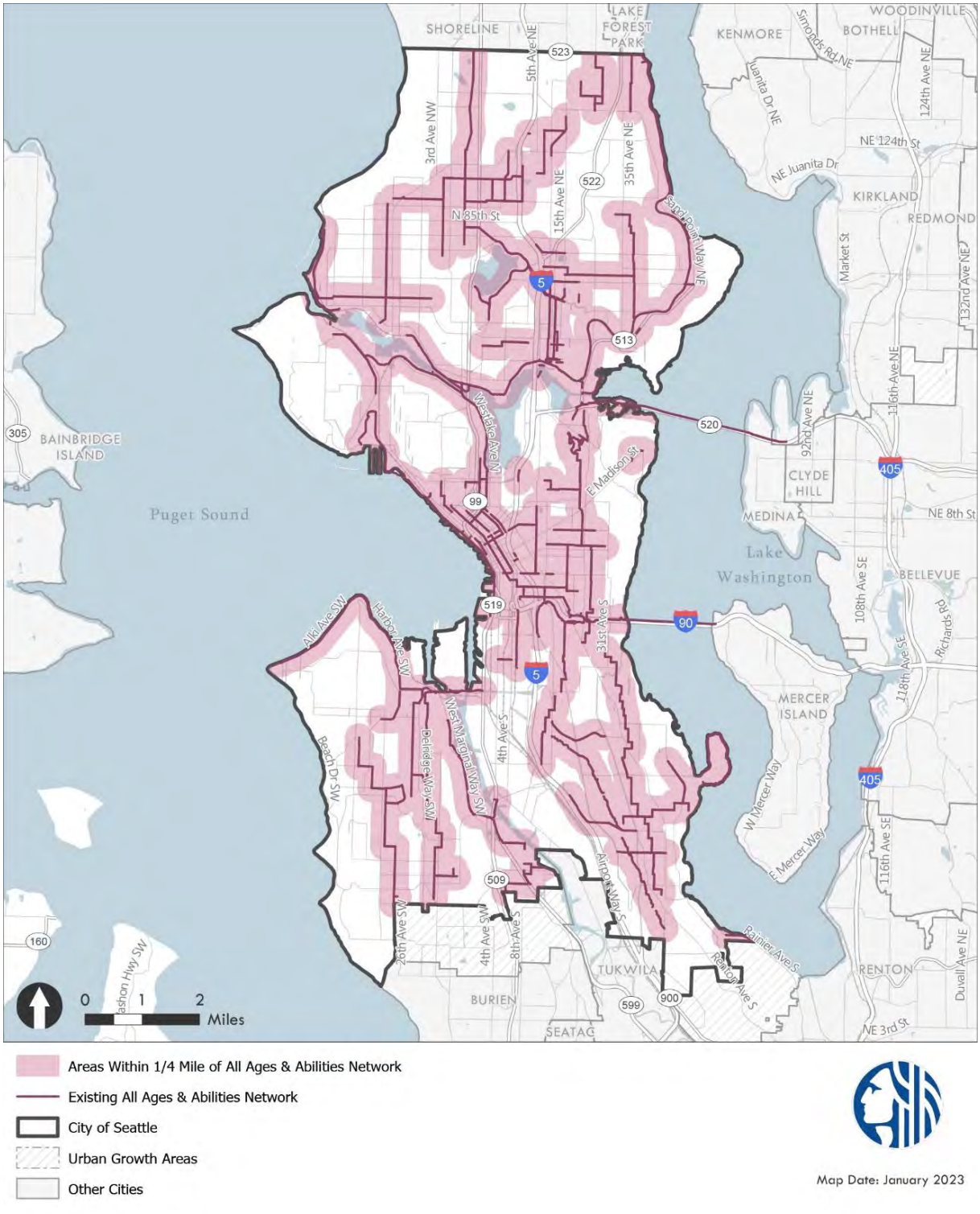
[79] Seattle Department of Transportation. 2021. "Seattle Bicycle Master Plan: 2021-2024 Implementation Plan." https://www.seattle.gov/documents/Departments/SDOT/BikeProgram/BMP_Imp_Plan_2021_FINAL.pdf

Exhibit 3.10-15. Existing Bicycle Facilities, 2022



Sources: Seattle Department of Transportation, 2022.

Exhibit 3.10-16. Existing All Ages & Abilities Network, 2022



Sources: Fehr & Peers analysis of Seattle Department of Transportation, 2022.

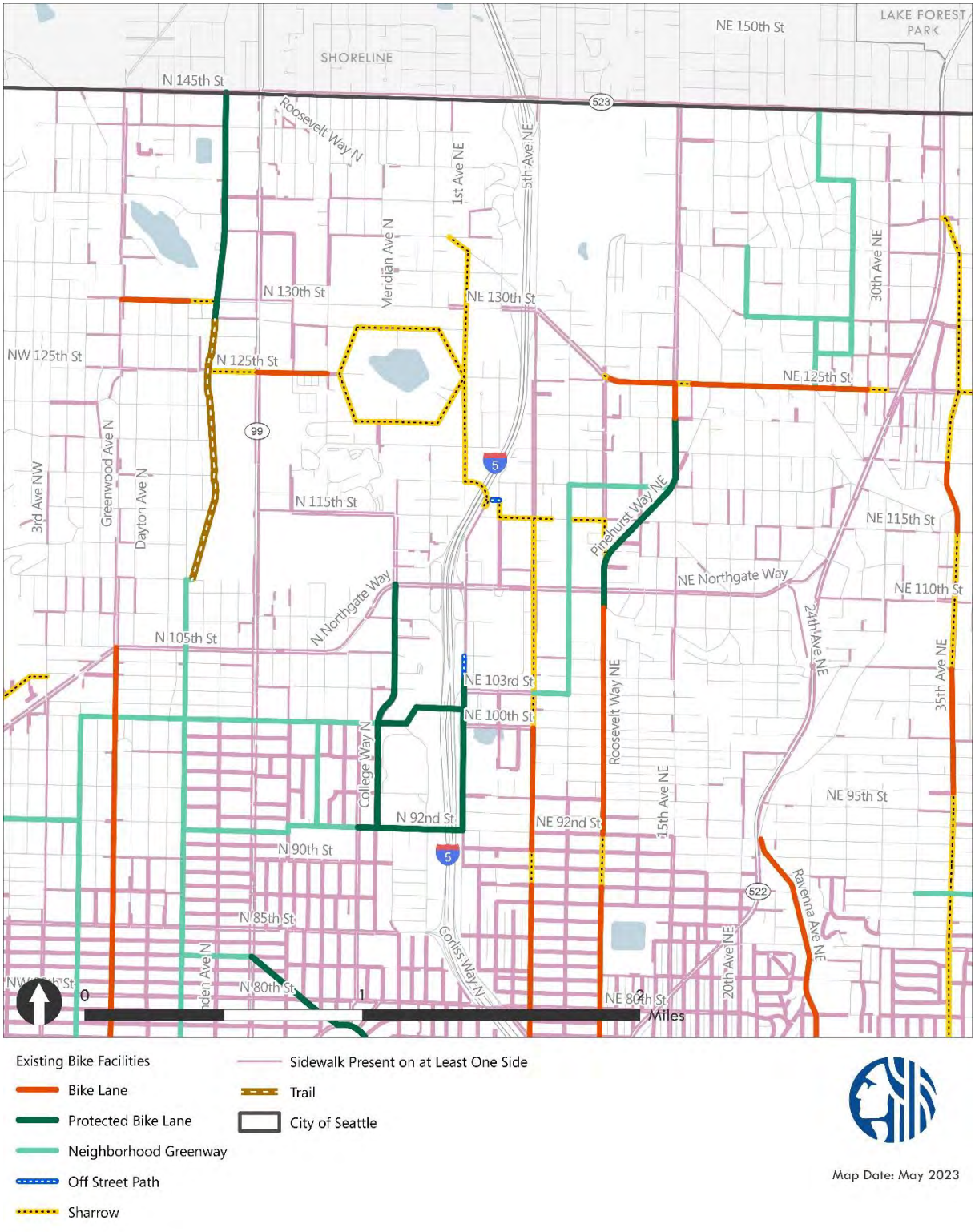
NE 130th / NE 145th Street Subarea

Exhibit 3.10-17 displays a map of the bicycle and pedestrian facilities within the subarea. In the NE 130th / NE 145th Street subarea, the pedestrian network has frequent gaps. Arterials such as NE 130th Street and Roosevelt Way NE have good sidewalk connectivity, but many north/south streets surrounding the area lack continuous sidewalks and ADA-compliant curb ramps. There are two planned sidewalk projects scheduled to be implemented in 2024: the first on 5th Avenue NE between NE 125th Street and NE 130th Street and the second on N 128th Street between Meridian Avenue N and Ashworth Avenue N.[80]

Within the 130th/145th subarea, there are bike lanes on NE 125th Street connecting to a protected bike lane on 15th Avenue NE and Pinehurst Way NE as well as several neighborhood greenways east of I-5. The All Ages & Abilities network is more limited on the west side of I-5. Additional protected and striped lanes are planned within the subarea.[81]

[80] Seattle Department of Transportation. "Sidewalk Development Program." https://www.seattle.gov/transportation/projects-and-programs/programs/pedestrian-program/sidewalk-development-program
[81] Seattle Department of Transportation. "SDOT Bike Map." https://seattlecitygis.maps.arcgis.com/apps/webappviewer/index.html?id=a24b25c3142c49e194190d6a888d97e3

Exhibit 3.10-17. NE 130th / NE 145th Street Subarea



Sources: Seattle Department of Transportation, 2022.

Transit

Seattle's public transit services are provided by King County Metro, Sound Transit, Community Transit, Kitsap Transit, and the City of Seattle. **Exhibit 3.10-18** displays Seattle's transit facilities.

Sound Transit's Link light rail serves the greater Seattle area with about 25 miles of rail coverage and 11.5 million annual riders in 2021. As of 2024, ~~T~~the 1 Line runs from ~~Northgate Station~~Lynnwood through the center city and south to Seattle-Tacoma International Airport and Angle Lake. The park-and-ride located at Northgate Station serves as a central hub for riders in the northern parts of the city.

Sound Transit plans to expand the Link light rail network in the next several years. The 1 Line will be extended ~~northward to Lynnwood and~~ southward to Federal Way, with a targeted opening of 2026~~4 or 2025~~. ~~This will include the NE 130th Street Station and Shoreline South/148th Station just north of the Seattle city limit.~~ The 2 Line, slated to ~~open~~ connect to the rest of the light rail system in 2025~~4~~, will run from Redmond to Northgate via Downtown Bellevue and Seattle. Additional expansions will incorporate the entire Everett to Tacoma corridor. Within Seattle, the Link network will be expanded to include lines to West Seattle and Ballard with expected completion dates of 2032 and 2037-2039, respectively.[82]

Transit Ridership

In 2019, the mode share of workers who arrived at Seattle's center city core between 6 AM and 9 AM by public transit was 46 percent (Commute Seattle 2019). The share of workers who drove alone to the city center was 26 percent. The COVID-19 pandemic has affected commuting behaviors since early 2020. Depending on the nature of the industry, many employers shifted to a full or partial remote format. Accordingly, this shaped the demand for travel during peak periods as well as the level of comfort people have sharing a space with other commuters. King County Metro reported a drop in ridership from over 123 million annual riders in 2019 to approximately 58 million riders in 2020. While transit ridership has begun to rebound since 2020, commuting patterns continue to evolve as remote and hybrid work has become more common in many workplaces.

King County Metro (KCM) operates fixed route bus service, on-demand transit, night service shuttles, and a limited number of ferry and rideshare programs. This includes three RapidRide routes connecting the center city to West Seattle (the C Line), Ballard (the D Line) and Shoreline along the Aurora Avenue corridor (the E Line). Seattle is also served by Community Transit bus routes that provide service north into Snohomish County and Kitsap Transit ferries to Kingston and Bremerton.

In addition to bus and light rail modes of public transit, the City of Seattle hosts a monorail as well as two streetcar lines: South Lake Union and First Hill.[83] At present, the two routes are not connected. However, there are plans in place to join the routes and provide north-south

[82] The Sound Transit Board completed a realignment process to adjust project timelines to reflect financial constraints. Depending on the ability to close the funding gap, service may open to Smith Cove in 2037 and Ballard in 2039. https://www.soundtransit.org/system-expansion/west-seattle-ballard-link-extensions/timeline-milestones

[83] Seattle Department of Transportation. "Seattle Streetcar." https://www.seattle.gov/transportation/getting-around/transit/streetcar#streetcar-reports

connectivity through the Center City Connector route. The Seattle Monorail is owned by the City of Seattle and is operated by Seattle Monorail Services (SMS). The Seattle Monorail serves a singular route between two stations: Seattle Center and Westlake Center. Both the Seattle Monorail and the Seattle streetcars accept ORCA card payment for the cost of fares.

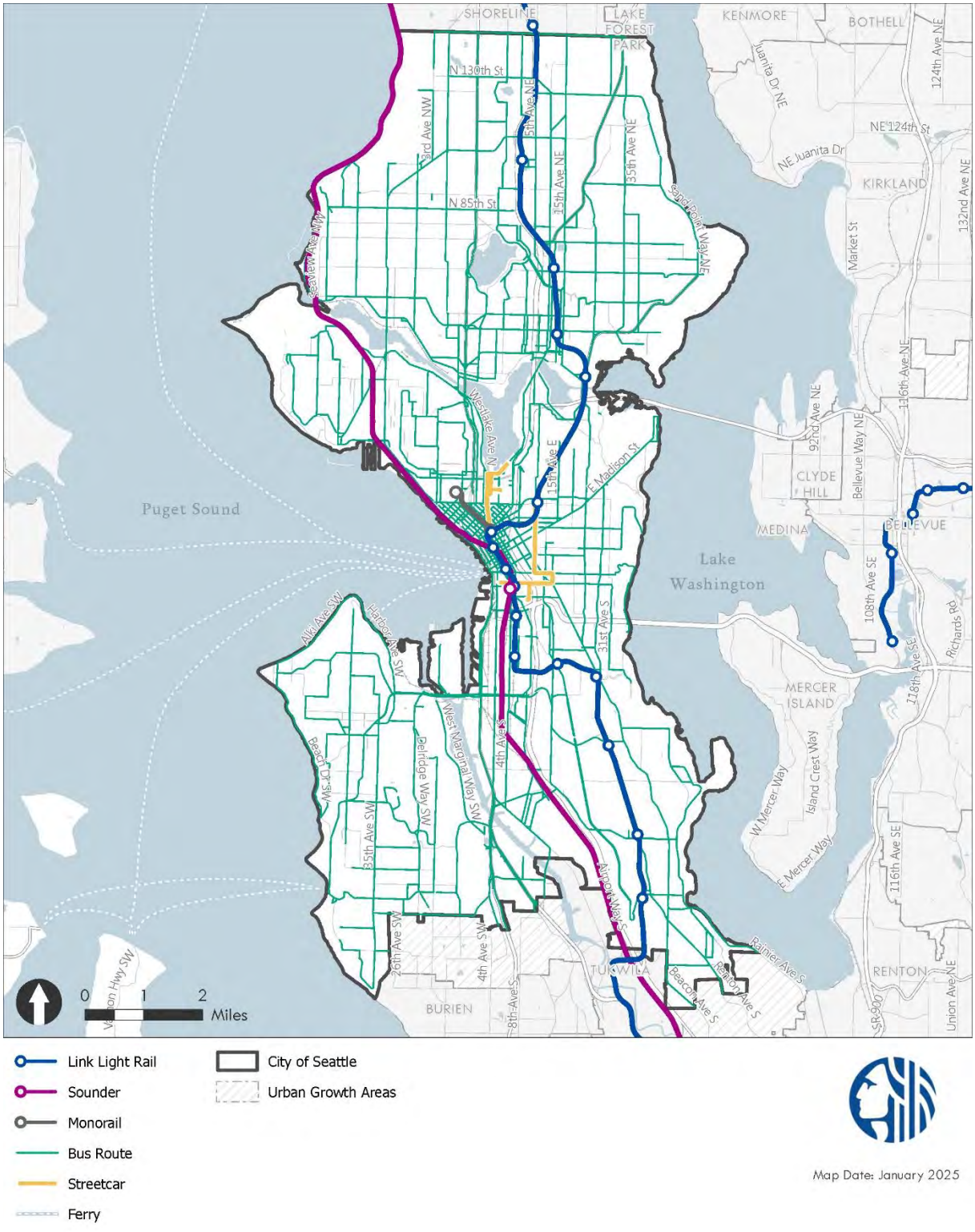
The Washington State Ferries (WSF) system serves many residents of the City of Seattle. The ferry system includes the following four routes, with Seattle service[84]:

- Seattle (Colman Dock) / Bainbridge Island
- Seattle (Colman Dock) / Bremerton
- Seattle (Fauntleroy Terminal) / Southworth
- Seattle (Fauntleroy Terminal) / Vashon

ORCA cards are accepted as a form of payment for all ferries, however there are some limitations for usage.[85]

[84] Washington State Department of Transportation. "Schedule By Route." https://wsdot.com/ferries/schedule/default.aspx
[85] Washington State Department of Transportation. "Wave2Go." https://wave2go.wsdot.com/webstore/landingPage?cg=21&c=76

Exhibit 3.10-18. City of Seattle Transit Service



Sources: Seattle Department of Transportation, 2023~~5~~.

On fixed route buses, KCM uses two separate measures of passenger loads: number of passengers compared to space on the bus; and the amount of time the bus has a standing load (i.e., more passengers than seats). For each trip, KCM further determines a passenger load threshold for overcrowding, based on the characteristics of the bus type scheduled for that trip. This threshold is determined by the number of seats on the bus and the number of standing people that can fit on the bus (assuming each standing person is given at least four square-feet of space). KCM considers these routes for further investment to alleviate overcrowding—this can be achieved by assigning a larger vehicle to the trip, adjusting the spacing of trips, or adding trips.

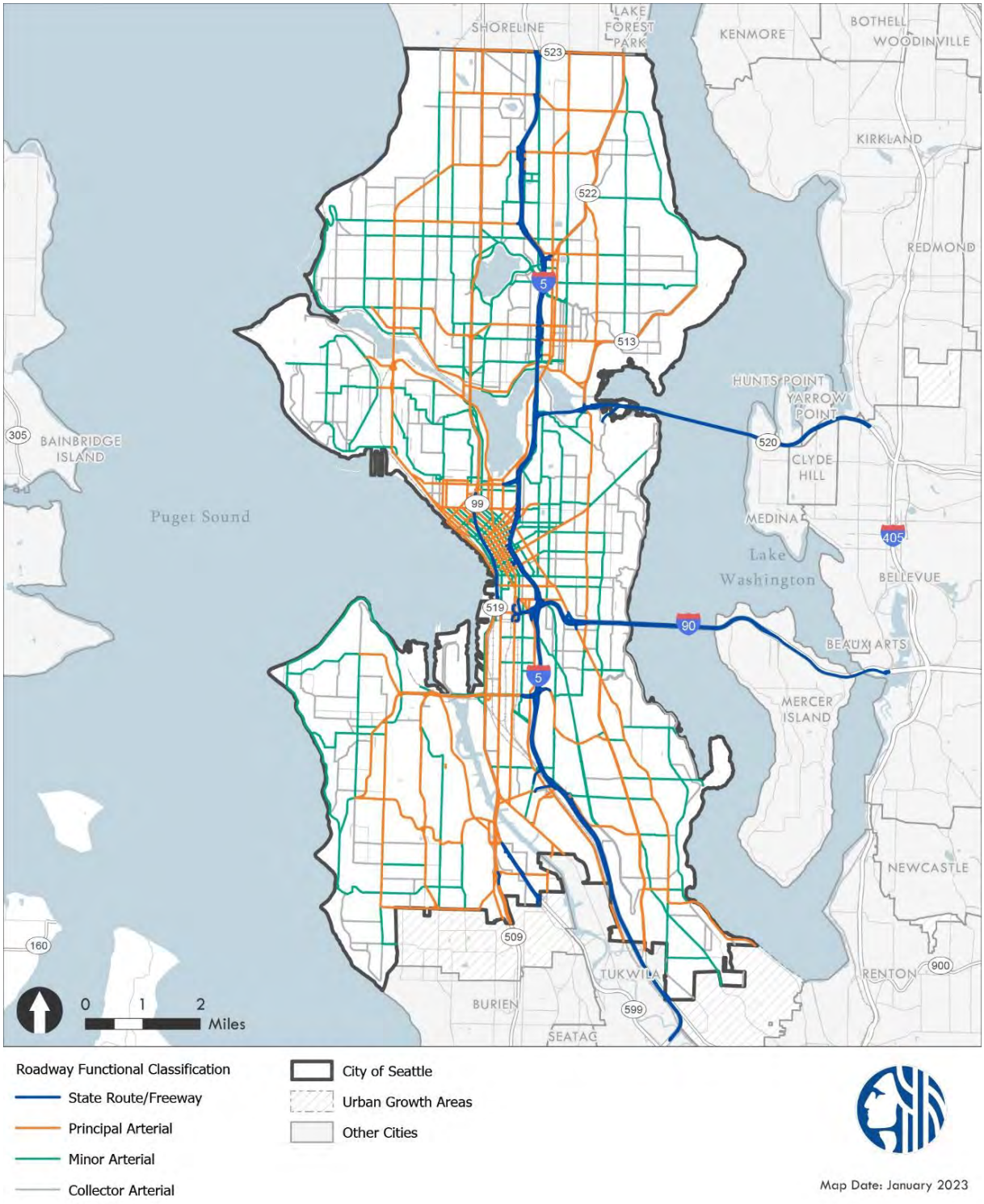
Based on Fall 2019 data, out of 57 bus routes operating in the City of Seattle, four routes had one trip that exceeded the crowding threshold during the PM peak period. These include:

- Route 40: Northgate to Downtown Seattle via Loyal Heights, Crown Hill, Ballard, Fremont and South Lake Union.
- Route 62: Sand Point to Downtown Seattle via View Ridge, Ravenna, Green Lake, Wallingford, Fremont and South Lake Union.
- Route 63: Northgate to Downtown Seattle via Maple Leaf, Ravenna and the University District (note this route stopped operating after the 2021 opening of the 1 Line to Northgate).
- Route 64: Lake City to Downtown Seattle via Wedgwood, Ravenna, University District and South Lake Union.
- **Appendix H~~.2~~** displays the inbound and outbound crowding summaries by bus route.

Roadway Users

The City of Seattle is served by a dense roadway system of principal, minor, and collector arterials, as shown in **Exhibit 3.10-19**. City arterials generally follow a grid pattern. Much of Seattle's transportation network is constrained by the waterways within and around the city. The Ship Canal divides north Seattle from the rest of the city, with six crossing points: the Ballard Bridge, the Fremont Bridge, State Route (SR) 99, Interstate 5 (I-5), the University Bridge, and the Montlake Bridge. Likewise, West Seattle is separated from the rest of the city by the Duwamish Waterway, and is accessed via the West Seattle Bridge, Spokane Street Bridge, the First Avenue S Bridge, and the South Park Bridge.

Exhibit 3.10-19. Arterial Classification, 2022



Sources: Seattle Department of Transportation, 2022.

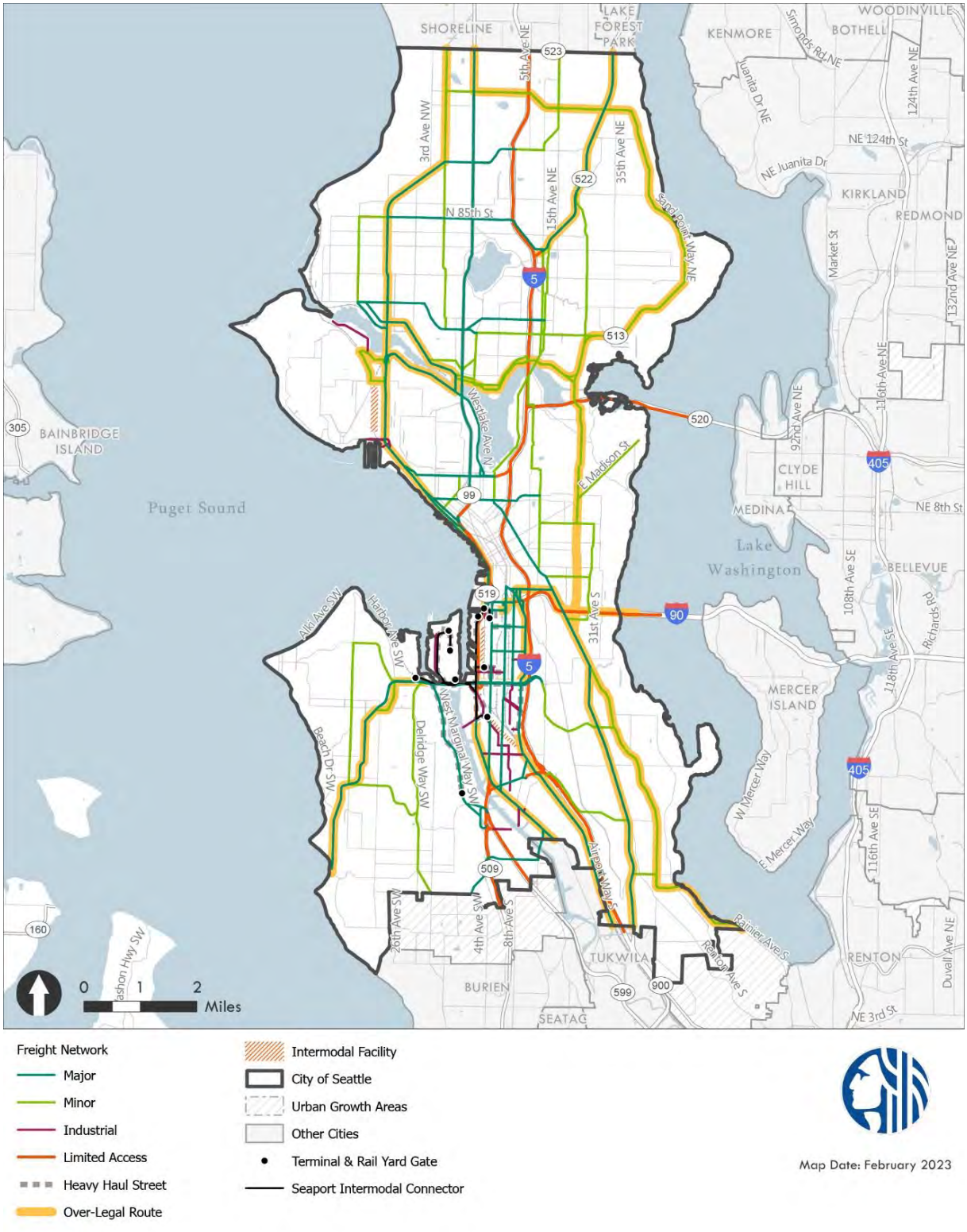
Freight

Seattle is a key port city along the West Coast and has two industrial zones that need ample transportation access to function: Ballard-Interbay-Northend and Duwamish Manufacturing and Industrial Centers (MICs). Seattle has designated a major truck street network throughout the city that carries a substantial amount of freight traffic. As shown in **Exhibit 3.10-20**, the freight network is comprised of state routes, interstates, and major arterials linking key freight destinations as well as intermodal facilities where freight is transferred among rail, truck, and ship. The map also shows terminal and rail yard gate locations, the heavy haul network, and over-legal routes.

Rail is also a critical mode for freight movement within the MICs. There are two Class 1 railroads in Seattle: BNSF and the Union Pacific Railroad (UP). The BNSF mainline extends north-south through Seattle and operates in a doubled-tracked tunnel through downtown, serving Balmer Yard in the BINMIC and SIG in the Duwamish MIC. The UP mainline only operates south of downtown Seattle and parallels the BNSF network, serving the Seattle ARGO Terminal. The MICs also include a variety of local rail spurs that provide direct rail service to businesses as well as on-dock rail at Port of Seattle terminals.

The BNSF and UP railroads cross roadways in many locations throughout the MICs. While at-grade crossings are more limited in the BINMIC, they are prevalent throughout the Duwamish MIC. When a train is passing through these locations, the crossing is closed to vehicle traffic resulting in delays to those on the roadway network, particularly truck freight in heavily industrial areas. Delays depend on the frequency and duration of the at-grade crossing closure and have been identified by the freight community as a key challenge for truck freight mobility.

Exhibit 3.10-20. Freight Network



Sources: Seattle Department of Transportation, 2022.

VMT / VHT / Average Trip Speed

Several metrics are used to evaluate the use of the road network: vehicle miles traveled (VMT), vehicle hours traveled (VHT), and average trip speed. VMT and VHT are calculated on a per capita basis to normalize each metric against the number of people living and working in Seattle.

Based on the base year PSRC travel demand model, Seattle is currently estimated to generate 22.2 million VMT each day. This equates to roughly 17.2 VMT per Seattle resident and worker. Total VHT is estimated to be 741,900 each day which equates to an average of 34 minutes of vehicle travel per person. The average speed of all trips generated is approximately 30mph. This includes travel on the highway system and local roadway network.

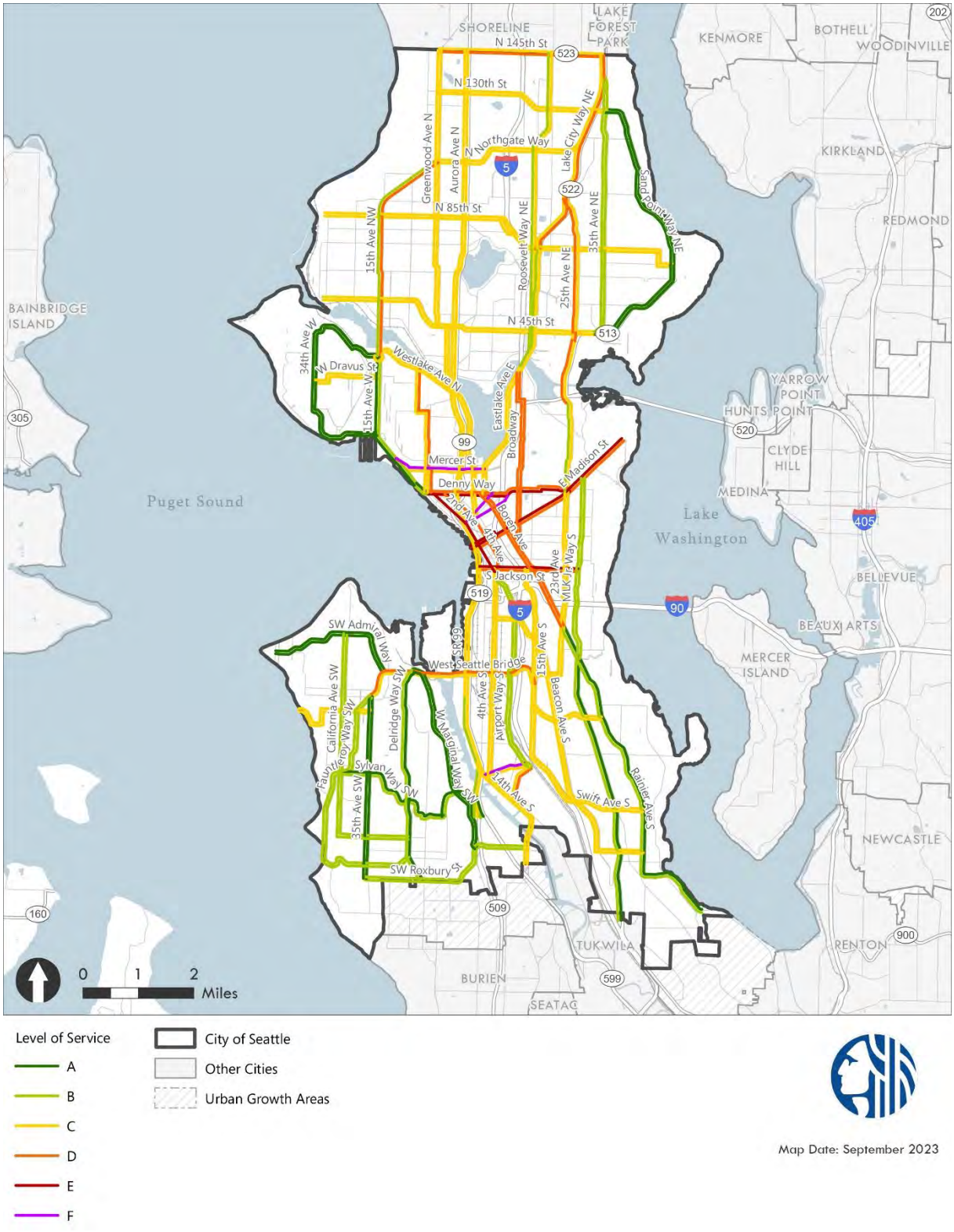
Telework & VMT

As a result of the COVID-19 pandemic, some workplaces have deviated from the typical in-person environment. As a result, commuting patterns have changed with increased telework opportunities. An analysis based on a recent household travel survey in the Sacramento region found that while workers who only telework generate substantially less VMT than workers who do not telework at all, workers who telework on some but not all days do not generate statistically less VMT than workers who do not telework at all.

Travel Time

PM peak hour corridor travel time results are summarized in **Exhibit 3.10-21** and **Exhibit 3.10-22**. As shown when mapped geographically, corridors closest to the center city tend to operate at LOS D through F with travel time generally improving in outlying neighborhoods. Corridors that cross waterways are also pinchpoints in the network and therefore tend to have lower LOS.

Exhibit 3.10-21. PM Peak Hour Corridor Travel Time, 2019



Sources: Fehr & Peers analysis of SDOT Iteris data, 2023.

Exhibit 3.10-22 PM Peak Hour Travel Time Corridor Level of Service

			Minutes / Level of Service	
Roadway	Extents		N/E	S/W
N 145th St	Greenwood Ave N	Lake City Way NE	10 / D	9.5 / C
N 130th St	Greenwood Ave N	35th Ave NE	11.5 / C	12 / C
N Northgate Way	Greenwood Ave N	Lake City Way NE	10.5 / C	10.5 / C
N 85th St	32nd Ave NW	Sand Point Way NE	24.5 / C	24.5 / C
N 45th St	32nd Ave NW	Union Bay Pl NE	23.5 / C	23.5 / C
15th Ave NW	W Emerson St	N 105th St	16 / D	10.5 / B
Greenwood Ave N	Nickerson St	N 145th St	26 / C	24 / C
Aurora Ave N	N 38th St	N 145th St	18.5 / C	15 / C
Roosevelt Way NE	Fuhrman Ave E	N 145th St	22 / C	20.5 / B
Lake City Way NE	NE 75th St	N 145th St	13.5 / D	10 / C
25th Ave NE	E Roanoke St	Lake City Way NE	14 / C	21 / D
35th Ave NE	Union Bay Pl NE	Lake City Way NE	16.5 / B	17 / B
Sand Point Way NE	Union Bay Pl NE	35th Ave NE	12.5 / A	12 / A
34th Ave W	15th Ave W	15th Ave W	11.5 / A	12 / A
W Dravus St	34th Ave W	15th Ave W	5 / C	4.5 / C
15th Ave W	Queen Anne Ave N	W Emerson St	9 / B	7.5 / A
Queen Anne Ave N	Denny Way	Nickerson St	12.5 / D	11.5 / C
SR 99	S Nevada St	N 38th St	13.5 / C	15 / C
Westlake Ave N	Stewart St	W Emerson St	16 / C	17 / C
Eastlake Ave E	Denny Way	Fuhrman Ave E	11.5 / C	10.5 / C
Broadway	Boren Ave	Eastlake Ave E	17.5 / D	17 / D
23rd Ave	E Madison St	E Roanoke St	6.5 / C	5 / B
Mercer St	Elliott Ave W	Fairview Ave N	7.5 / C	14 / F
Denny Way	Queen Anne Ave N	E Madison St	17 / E	16 / D
2nd Ave	4th Ave S	Denny Way	- / -	11.5 / E
4th Ave	S Jackson St	Denny Way	9 / D	- / -
Stewart St	1st Ave	Denny Way	- / -	6 / F
Olive Way	4th Ave	Denny Way	7 / F	- / -
E Madison St	Alaskan Way S	McGilvra Blvd E	20 / D	20 / E
Boren Ave	23rd Ave S	Denny Way	16 / D	14.5 / D
S Jackson St	Alaskan Way S	MLK Jr. Way S	8.5 / D	10.5 / E
23rd Ave	15th Ave S	E Madison St	14 / C	15.5 / C

Roadway	Extents		Minutes / Level of Service N/E	S/W
MLK Jr. Way S	Rainier Ave S	E Madison St	10 / B	11 / B
4th Ave S	E Marginal Way S	S Jackson St	12 / C	11.5 / C
Airport Way S	S Albro Pl	4th Ave S	10 / B	10 / B
15th Ave S	S Jackson St	Rainier Ave S	14.5 / C	16 / C
E Marginal Way S	S Holden St	S Nevada St	4.5 / C	4.5 / B
Swift Ave S	Rainier Ave S	S Columbian Way	13 / C	13 / C
Beacon Ave S	Rainier Ave S	4th Ave S	21.5 / C	24 / C
MLK Jr. Way S	S Boeing Access Rd	Rainier Ave S	14.5 / A	15.5 / B
Rainier Ave S	Cornell Ave S	23rd Ave S	17.5 / A	20 / B
S Michigan St	E Marginal Way S	Airport Way S	3.5 / C	4.5 / F
Ellis Ave S	E Marginal Way S	Airport Way S	3 / D	3.5 / C
14th Ave S	S Director St	1st Ave S	7 / C	7 / C
California Ave SW/SW Thistle St	Delridge Way SW	SW Admiral Way	17 / B	17 / B
Fauntleroy Way SW/SW Barton St	Delridge Way SW	35th Ave SW	15 / B	17 / B
35th Ave SW	SW Roxbury St	Fauntleroy Way SW	8.5 / A	9 / A
Delridge Way SW	SW Roxbury St	W Marginal Way SW	11 / A	13 / B
W Marginal Way SW	S Cloverdale St	Delridge Way SW	7.5 / A	8 / A
SW Admiral Way	63rd Ave SW	SW Manning St	6.5 / A	7 / A
West Seattle Bridge	35th Ave SW	15th Ave S	7.5 / C	10 / D
SW Alaska St	Beach Dr SW	35th Ave SW	7 / C	7.5 / C
Sylvan Way SW	California Ave SW	S Holden St	12 / B	10.5 / A
SW Roxbury St	35th Ave SW	14th Ave S	11 / B	10 / B

Source: Fehr & Peers analysis of SDOT Iteris data, 2023.

Screenlines

Exhibit 3.10-23 summarizes each screenline's LOS threshold and V/C ratio based on pre-pandemic observed counts. Almost all screenlines are below 90% capacity. Only three locations are estimated to exceed 90% capacity in one travel direction during the evening peak hour. These locations are all bridges crossing the Lake Washington Ship Canal—the Ballard Bridge, Fremont Bridge, and the Aurora Avenue Bridge which are currently operating at or near capacity. However, no screenlines currently exceed the established thresholds.

Exhibit 3.10-23. PM Peak Hour Screenline Volume-to-Capacity Ratios—Existing Conditions

Screenline	Screenline Location	Extents	V/C Threshold	Northbound/ Eastbound V/C Ratio	Southbound/ Westbound V/C Ratio
1.11	North City Limit	3rd Ave NW to Aurora Ave N	1.20	0.68	0.52
1.12	North City Limit	Meridian Ave N to 15th Ave NE	1.20	0.47	0.30
1.13	North City Limit	30th Ave NE to Lake City Way NE	1.20	0.84	0.47
2.00	Magnolia	Magnolia Bridge to W Emerson Place	1.00	0.56	0.61
3.11	Duwamish River	West Seattle Bridge & Spokane St	1.20	0.64	0.81
3.12	Duwamish River	1st Ave S & 16th Ave S	1.20	0.56	0.87
4.11	South City Limit	Martin Luther King Jr. Way to Rainier Ave S	1.00	0.57	0.75
4.12	South City Limit	Marine Dr SW to Meyers Way S	1.00	0.37	0.42
4.13	South City Limit	SR 99 to Airport Way S	1.00	0.44	0.45
5.11	Ship Canal	Ballard Bridge	1.20	1.01	0.71
5.12	Ship Canal	Fremont Bridge	1.20	1.00	0.79
5.13	Ship Canal	Aurora Ave Bridge	1.20	0.96	0.58
5.16	Ship Canal	University & Montlake Bridges	1.20	0.74	0.79
6.11	South of NW 80th St	Seaview Ave NW to 15th Ave NW	1.00	0.37	0.46
6.12	South of N W 80th St	8th Ave NW to Greenwood Ave N	1.00	0.57	0.49
6.13	South of NE 80th St	Linden Ave N to 1st Ave NE	1.00	0.54	0.49
6.14	South of NE 80th St	5th Ave NE to 15th Ave NE	1.00	0.71	0.56
6.15	South of NE 80th St	20th Ave NE to Sand Point Way NE	1.00	0.47	0.34
7.11	West of Aurora Ave	Fremont Pl N to N 65th St	1.00	0.53	0.65
7.12	West of Aurora Ave	N 80th St to N 145th St	1.00	0.41	0.41
8.00	South of Lake Union	Valley St to Denny Way	1.20	0.49	0.35
9.11	South of Spokane St	Beach Dr SW to W Marginal Way SW	1.00	0.45	0.71
9.12	South of Spokane St	E Marginal Way S to Airport Way S	1.00	0.51	0.54
9.13	South of Spokane St	15th Ave S to Rainier Ave S	1.00	0.56	0.57
10.11	South of S Jackson St	Alaskan Way S to 4th Ave S	1.00	0.61	0.64
10.12	South of S Jackson St	12th Ave S to Lakeside Ave S	1.00	0.52	0.64
12.12	East of CBD	S Jackson St to Howell St	1.20	0.36	0.36

Screenline	Screenline Location	Extents	V/C Threshold	Northbound/ Eastbound V/C Ratio	Southbound/ Westbound V/C Ratio
13.11	East of I-5	NE Northgate Way to NE 145th St	1.00	0.67	0.51
13.12	East of I-5	NE 65th St to NE 80th St	1.00	0.52	0.54
13.3	East of I-5	NE Pacific St to NE Ravenna Blvd	1.00	0.59	0.52
A1	North of Seneca St	1st Ave to 6th Ave	N/A	0.47	0.50
A2	North of Blanchard	Elliott Ave to Westlake Ave	N/A	0.43	0.31
A3	East of 9th Ave	Lenora St to Pike St	N/A	0.46	0.83
A4	South of Mercer St	Elliott Ave W to Aurora Ave N	N/A	0.53	0.46
A5	East of 5th Ave N	Denny Way to Valley St	N/A	0.40	0.40
A6	North of Pine St	Melrose Ave E to 15th Ave E	N/A	0.39	0.32
A7	North of James St– E Cherry St	Boren Ave to 14th Ave	N/A	0.46	0.32
A8	West of Broadway	Yesler Way to E Roy St	N/A	0.47	0.38
A9	South of NE 45th St	7th Ave NE to Montlake Blvd NE	N/A	0.56	0.53
A10	East of 15th Ave NE	NE 45th St to NE 52nd St	N/A	0.51	0.48
A11	South of Northgate Way (N/NE 110th St)	N Northgate Way to Roosevelt Way NE	N/A	0.44	0.46
A12	East of 1st Ave NE	NE 100th St to NE Northgate Way	N/A	0.43	0.48

Sources: Fehr & Peers, 2023.

Intersection LOS—NE 130th / NE145th Street Subarea

Exhibit 3.10-24 summarizes the existing LOS and delay for each of the 15 study intersections within the 130th/145th Subarea. Among the 15 intersections, only one intersection (N 145th Street and Meridian Avenue N) operates at LOS E or worse. All other intersections operate at LOS D or better.

Exhibit 3.10-24. 130th/145th Street Subarea PM Peak Hour Level of Service—Existing Conditions

Intersection ID	Intersection	Level of Service / Delay (seconds)
1	NE 155th St / 5th Ave NE	B / 11
2	N 145th St / Aurora Ave N	D / 47
3	**N 145th St / Meridian Ave N**	**E / 58**
4	N 145th St / 1st Ave NE	C / 21
5	NE 145th St / I-5 On & Off Ramps	D / 35
6	NE 145th St / 5th NE	D / 42
7	NE 145th St / 15th Ave NE	D / 48
8	N 137th St / Meridian Ave N / Roosevelt Way N	A / 7

Intersection ID	Intersection	Level of Service / Delay (seconds)
9	N 130th St / Aurora Ave N	D / 51
10	N 130th St / Meridian Ave N	A / 9
11	N 130th St / 1st Ave NE	D / 52
12	NE 130th St / I-5 On Ramp	A / 2
13	NE 130th St / Roosevelt Way NE / 5th Ave NE	C / 32
14	Roosevelt Way NE / NE 125th St / 10th Ave NE	B / 17
15	NE 125th St / 15th Ave NE	D / 41

Source: Fehr & Peers, 2023.

State Facilities

State facilities are evaluated to monitor performance and facilitate coordination between the city and state per the Growth Management Act. I-5 runs north-south throughout the city, serving both local and regional travelers. SR 99 also runs north-south through the city and tends to serve more locally focused trips. To the east, there are two bridges across Lake Washington: SR 520 and Interstate 90 (I-90). These four state facilities are all designated as Highways of Statewide Significance (HSS) by WSDOT, a designation that assists with funding allocation. Other HSS facilities within the city include SR 509 connecting the Duwamish area south to Sea-Tac Airport; SR 519 connecting Colman Dock to I-90; and SR 522 connecting North Seattle to communities to the northeast.

Exhibit 3.10-25 summarizes the average annual daily traffic (AADT) on each HSS that passes through the city. For I-5 and SR 99, multiple study locations were selected. The AADT were compared to the maximum service volume correlating to WSDOT's LOS standard (e.g., the maximum number of vehicles that can be served while maintaining a LOS D).

WSDOT sets the standard for most of the HSS facilities in Seattle at LOS D; the exception is the segment of SR 99 between SR 509 and I-5 which has a standard of "E mitigated" meaning congestion should be mitigated when PM peak hour LOS falls below LOS E. Because the volumes are compared to the maximum service volume for WSDOT's LOS standard, a ratio above 1.0 indicates the state facility is not meeting its LOS standard.

Based on these findings, the segments of I-5 over the Ship Canal Bridge and north of the West Seattle Bridge are exceeding the LOS D standard. SR 99 over the Aurora Avenue Bridge and SR 522 south of NE 145th Street are also exceeding their LOS D standards.

Exhibit 3.10-25. ~~PM Peak Hour~~Daily State Facilities Level of Service—Existing Conditions

Facility	Extents	WSDOT LOS Standard	Average Annual Daily Traffic (AADT)	Existing Volume to LOS Service Volume Ratio
I-5	North of NE Northgate Way	D	215,000	0.96
I-5	**Ship Canal Bridge**	**D**	**203,000**	**1.21**

Facility	Extents	WSDOT LOS Standard	Average Annual Daily Traffic (AADT)	Existing Volume to LOS Service Volume Ratio
I-5	**North of West Seattle Bridge**	**D**	**253,000**	**1.24**
I-5	North of Boeing Access Rd Ramp	D	200,000	0.93
I-90	Mt Baker Tunnel	D	148,000	0.90
SR 99	North of N Northgate Way	D	31,000	0.96
SR 99	**Aurora Ave Bridge**	**D**	**71,000**	**1.19**
SR 99	Tunnel	D	39,000	0.58
SR 99	North of West Seattle Bridge	D	67,000	0.72
SR 99	South of S Cloverdale St	E (mitigated)	32,000	0.42
SR 509	1st Ave S Bridge	D	60,000	0.97
SR 519	S Atlantic St West of I-90 Ramps	D	29,000	0.90
SR 520	Lake Washington Bridge	D	74,000	0.60
SR 522	**South of NE 145th St**	**D**	**34,000**	**1.01**

Source: WSDOT Transportation Data and GIS Office, 2019.

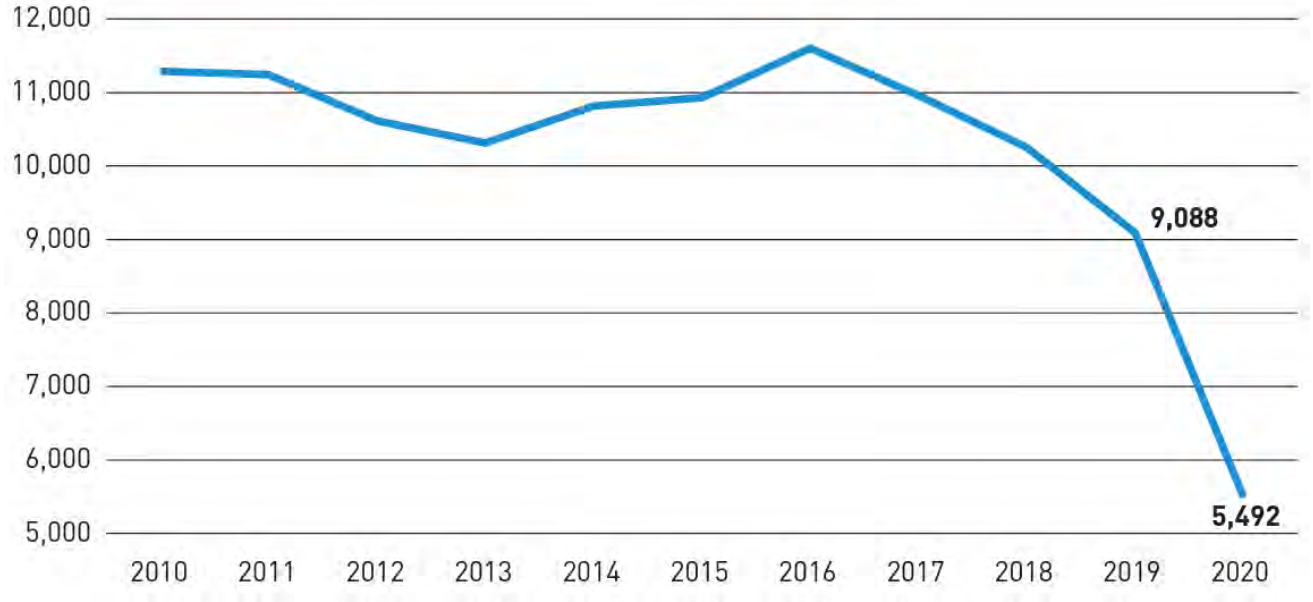
Safety

SDOT releases annual traffic reports that summarize citywide traffic information, including collision data. ~~The most recently released data comes from the 2021 traffic report, providing data through 2020.~~The traffic reports covering 2019 and 2020 were reviewed for this EIS. Due to the onset of the COVID-19 pandemic in 2020, the data covers a volatile period in terms of travel behavior. Accordingly, this section discusses both 2020 and 2019 data.

The total number of police reported collisions on Seattle streets had been decreasing since a peak in 2016 of about 11,500 collisions. In 2019, there were 9,088 reported collisions and 5,492 collisions in 2020.[86] This decrease in collisions between 2019 and 2020 can be attributed to the reduction in overall trips as a result of the COVID-19 pandemic. However, despite the lower total number of collisions in 2020, the collision rate reported in 2020 increased—in other words, there were more collisions per trip made. This is shown in **Exhibit 3.10-26** and **Exhibit 3.10-27**. In 2020, the collision rate is reported as 74.2 per million AADT trips and the 2019 collision rate is reported as 60.5 per million AADT trips.[87] Traffic-related fatalities in 2019 and 2020 were similar at 26 in 2019 and 25 in 2020, mostly among pedestrians both years.[88]

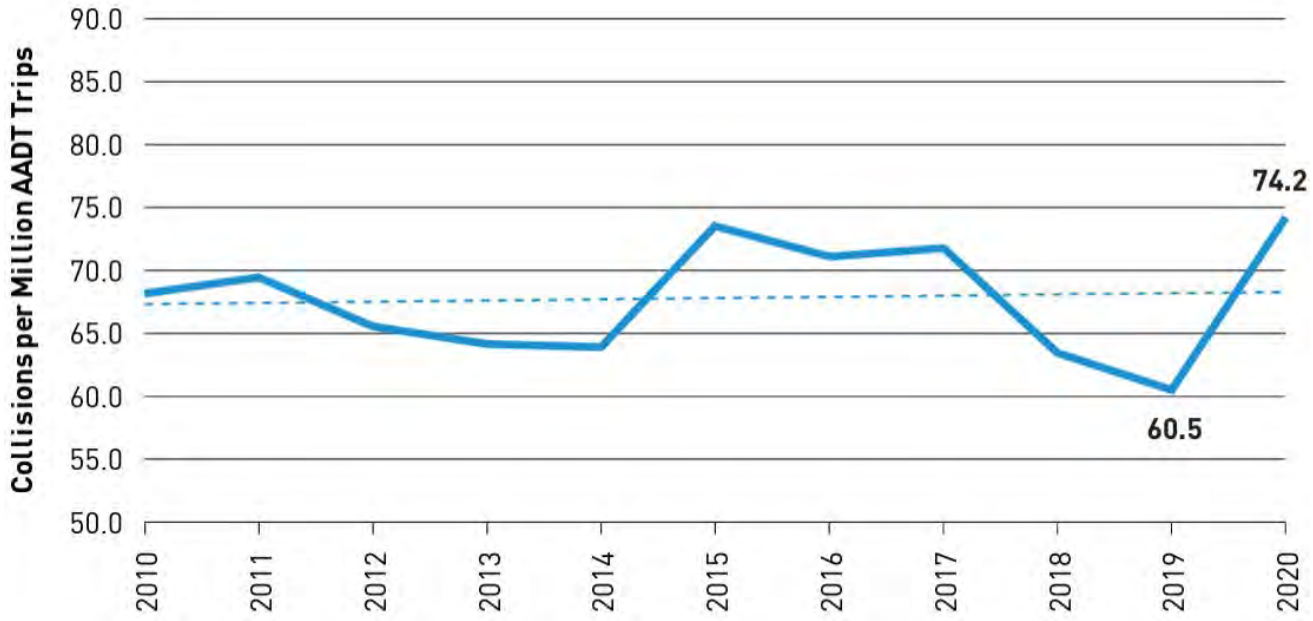
[86] Seattle Department of Transportation. 2022. "2021 Traffic Report." https://www.seattle.gov/documents/Departments/SDOT/About/DocumentLibrary/Reports/2021_Traffic_Report_ADA_21522.pdf (Page 22)
[87] Seattle Department of Transportation. 2022. "2021 Traffic Report." https://www.seattle.gov/documents/Departments/SDOT/About/DocumentLibrary/Reports/2021_Traffic_Report_ADA_21522.pdf (Page 23)
[88] Seattle Department of Transportation. 2022. "2021 Traffic Report." https://www.seattle.gov/documents/Departments/SDOT/About/DocumentLibrary/Reports/2021_Traffic_Report_ADA_21522.pdfhttps://www.seattle.gov/documents/Departments/SDOT/About/DocumentLibrary/Reports/2021_Traffic_Report_ADA_21522.pdf (Page 24)

Exhibit 3.10-26. Police Reported Collisions on Seattle Streets, 2010-2020



Source: SDOT, 2021 Traffic Report, 2022.

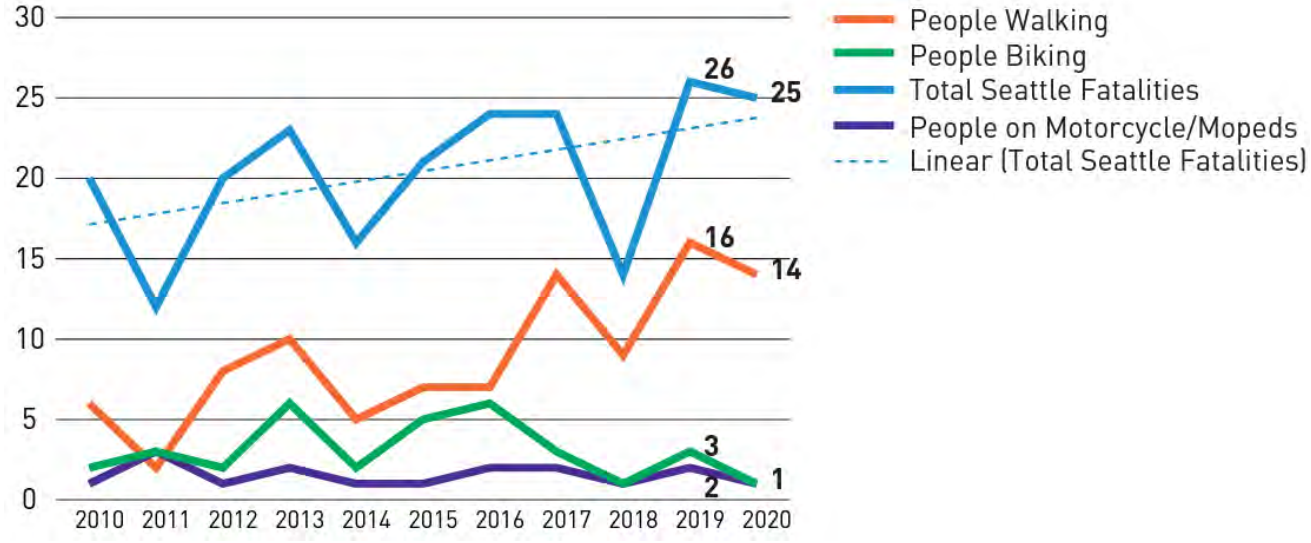
Exhibit 3.10-27. Citywide Collision Rate, 2010-2020



Source: SDOT, 2021 Traffic Report, 2022.

The report also summarizes trends among each mode, as shown in **Exhibit 3.10-28**. Over the past decade, fatalities on Seattle's streets have been increasing, particularly among people walking as they are among the most vulnerable in collisions with vehicles.

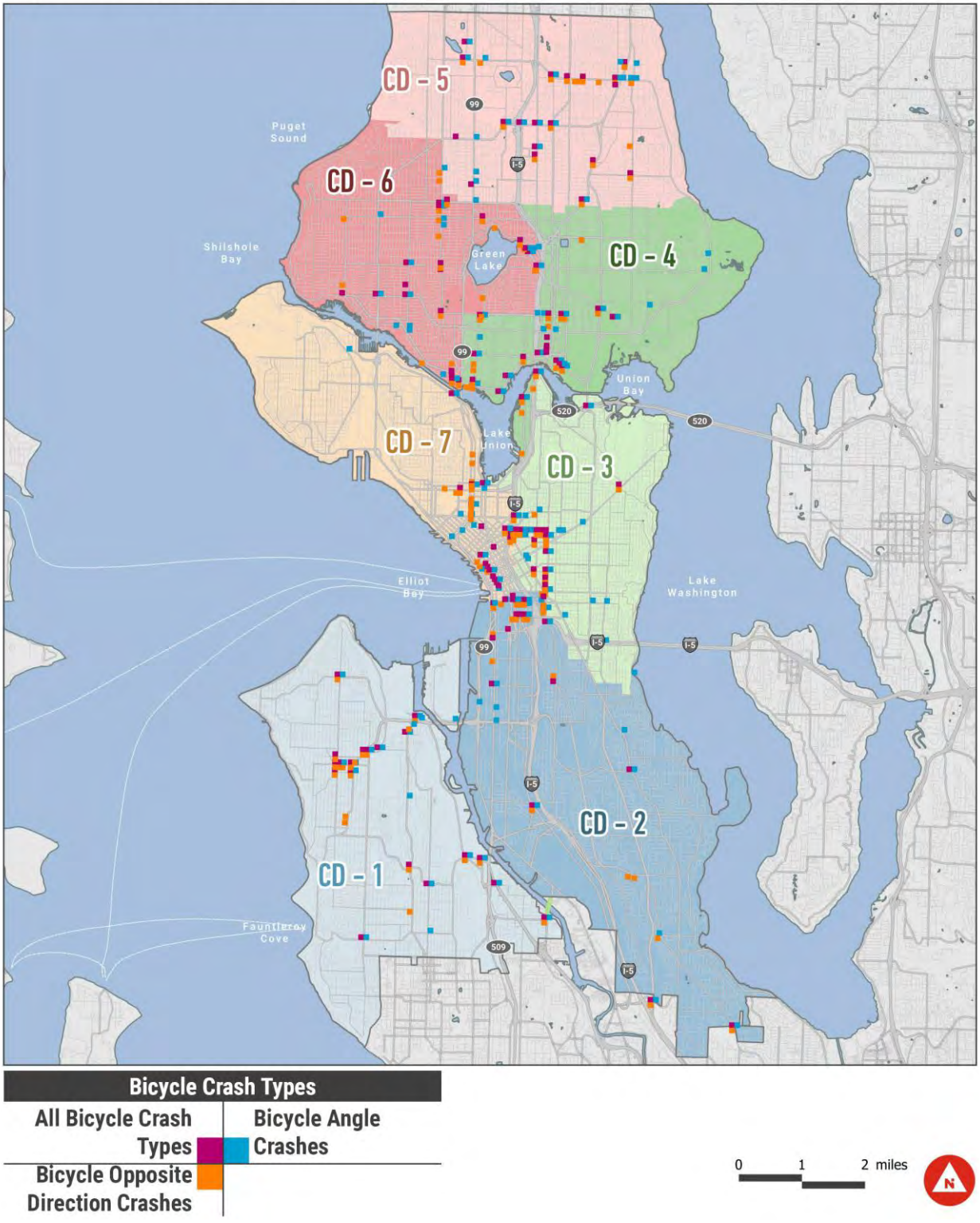
Exhibit 3.10-28. Traffic Fatalities on Seattle Streets, 2010-2020



Source: SDOT, 2021 Traffic Report, 2022.

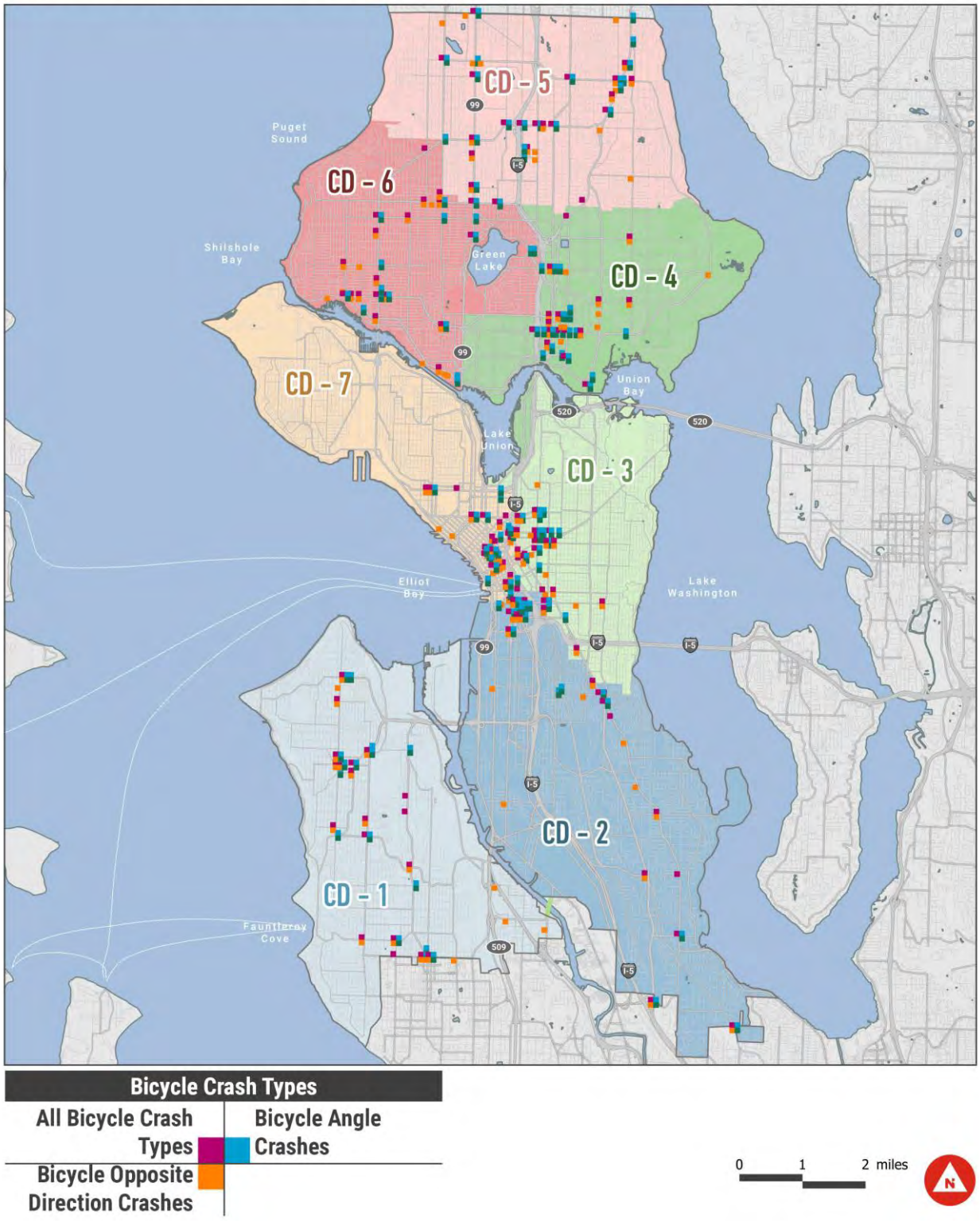
In 2020, SDOT released Phase 2 of the City of Seattle's Bicycle and Pedestrian Safety Analysis, providing statistical foundations for analyzing bicyclist and pedestrian collision data between 2010 and 2017. The analysis involved mapping the locations and types of bicycle and pedestrian collisions to determine priority locations for each council district. **Exhibit 3.10-29** and **Exhibit 3.10-30** display maps of collision locations by type in each council district. As part of the Vision Zero goal in place in the City of Seattle, SDOT is taking both proactive and reactive measures to eliminate serious injuries and fatalities from Seattle's streets.

Exhibit 3.10-29. Top 20 Priority Bicycle Locations Per Council District



Source: SDOT, City of Seattle Bicycle and Pedestrian Safety Analysis Phase 2, 2020.

Exhibit 3.10-30. Top 20 Priority Pedestrian Locations Per Council District



Source: SDOT, City of Seattle Bicycle and Pedestrian Safety Analysis Phase 2, 2020.

3.10.2 Impacts

This section discusses the potential impacts of each of the future year alternatives. Each of the action alternatives (Alternatives 2 through 5 and the Preferred Alternative) are measured against the expected conditions of the No Action Alternative (Alternative 1). While there is uncertainty inherent in any analysis of future travel behavior, this EIS uses the best available tool, the PSRC travel model, as a consistent basis to evaluate the future year alternatives. In particular, the model is best used to identify relative differences among alternatives rather than provide a specific prediction of the exact location and magnitude of impacts, particularly given this is a programmatic EIS assessing areawide changes rather than specific development proposals which are unknown at this time.

Analysis Methodology & Planning Scenarios Evaluated

For the Draft EIS, five alternatives ~~are~~ were evaluated under future year 2044 conditions for each of the key metrics. The same transportation network ~~i~~was assumed under each alternative. That network includes all existing facilities plus those considered to be reasonably foreseeable by the 2044 horizon year based on adopted plans at the time of analysis. The 2044 transportation network used in the Draft~~is~~ EIS is consistent with the assumptions used for the Seattle Transportation Plan (STP) EIS No Action Alternative. More details describing each alternative can be found in **Chapter 2**.

Per **Section 2.4.8 Transportation Planning & Alternatives**, the City evaluated its transportation plan in a separate EIS in February 2024. For this Final EIS, the City identified a Preferred Alternative to be evaluated which includes a growth strategy, updated Comprehensive Plan elements, and development code updates. In addition, since the Draft EIS was published in March 2024, the City adopted the Seattle Transportation Plan (STP). The long-term STP concepts are implemented during the 20-year planning period by the Transportation Element and Capital Facilities Plan. Thus to consider land use and transportation elements together, the SoundCast travel demand model was updated for this Final EIS to reflect the network maps, policy direction, and candidate projects identified in the STP. While the specific project list will be refined over time, the revisions to the model reflect the overarching goals of the STP to make active transportation and transit more convenient choices for Seattle residents and employees. Therefore, the revised model reflects the reallocation of some general purpose roadway capacity to become dedicated transit (or transit and freight) lanes which provide better speed and reliability for those modes, increase the capacity to move people along a corridor, and accommodate increased growth. As required, the City would prepare additional analysis and take public and stakeholder input into consideration before implementing specific transportation improvement projects, whether they are included in the STP or identified as mitigation for an action alternative. SDOT may choose not to pursue the projects assumed for modeling purposes due to potential impacts and future outcomes from community engagement, but they are used as a reasonably likely assumption to assess the proposed land use alternative.

Because the focus of this EIS is the Comprehensive Plan land use proposal, the STP assumptions were incorporated into an updated Alternative 1, No Action, as well as the Preferred Alternative models. The updated Alternative 1, No Action, is the baseline for comparison to isolate the effects that can be expected as a result of the Preferred Alternative.

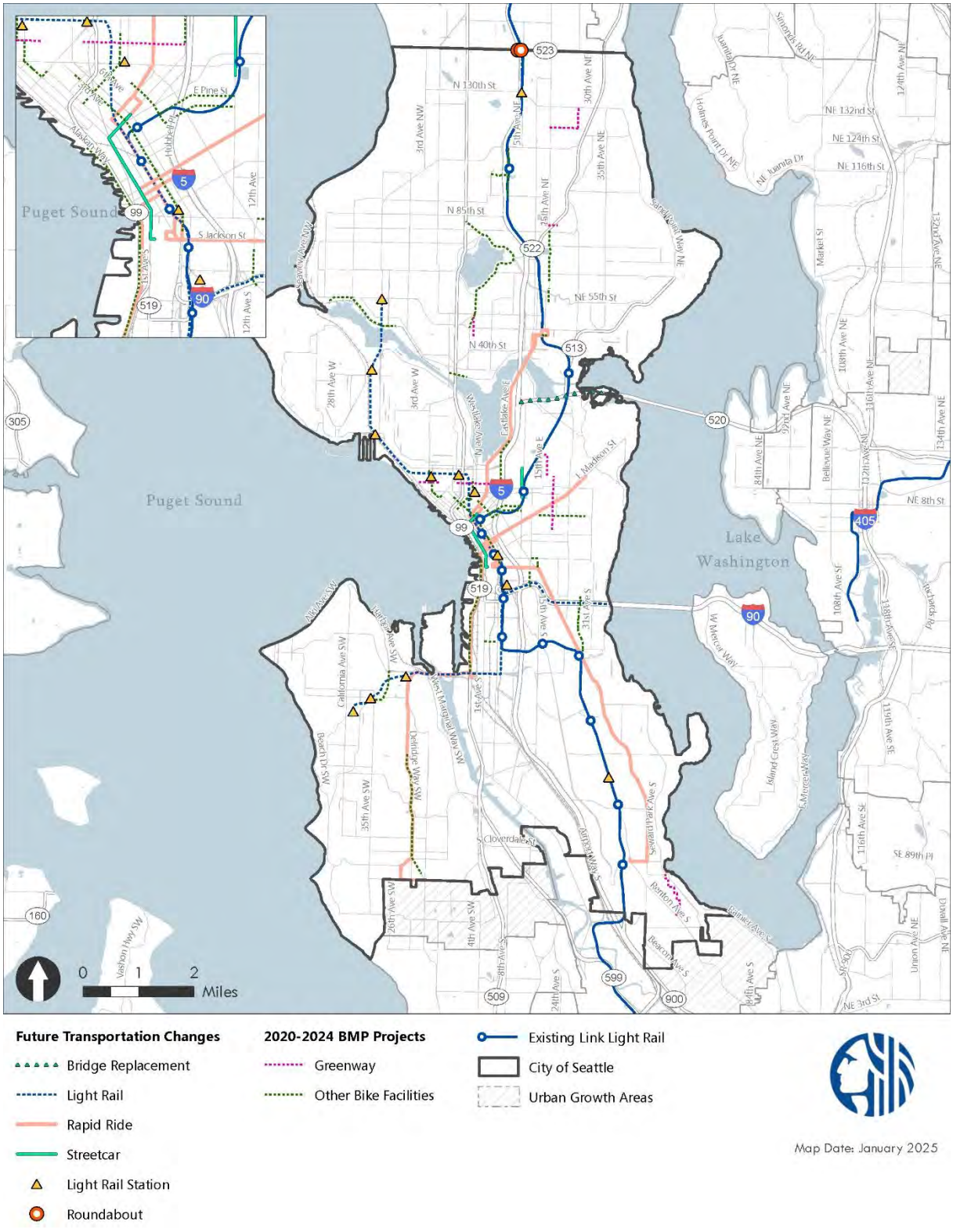
Travel Demand Forecasting

As described in the **Data & Methods** section, the PSRC's regional travel demand model, SoundCast, was used to develop travel forecasts for each of the future year alternatives. The model covers the four-county region of King, Kitsap, Snohomish, and Pierce counties. SoundCast is an activity-based model which estimates travel behavior across the region based on characteristics of individual persons and their households. The model produces detailed trip diaries for each simulated person in the region throughout an average weekday tracking the departure time, starting location, ending location, travel mode, and any other people sharing that trip.

SoundCast accounts for the household and employment forecasts for each future year alternative within the City of Seattle and is consistent with regional assumptions from PSRC for the areas outside city limits. The model also incorporates planned transportation facilities into the model network, such as the Link light rail extensions to Ballard and West Seattle. The projects assumed to be in place by 2044 for the Draft EIS alternatives are shown in **Exhibit 3.10-31**. See the previous section for a description of the additional network changes assumed for the Final EIS modeling.

The purpose of this EIS is to compare impacts among the future year alternatives. Relative to prior travel demand model frameworks developed by PSRC, SoundCast projects substantially higher transit usage in the future. While future travel behavior cannot be definitively known, these travel behavior assumptions underly the modeling for all future year alternatives, providing a consistent basis for comparison across the alternatives. A sensitivity test is included ~~at the end of the document~~ to explore how effects may differ with a lower transit mode share and higher vehicle mode share.

Exhibit 3.10-31 Planned Transportation Improvements for Draft EIS Alternatives, 2044



Source: City of Seattle, 2025~~3~~.

Although not individually modeled, the potential impacts of Alternative 4 are expected to fall between the other action alternatives due to the overall magnitude of growth and pattern of density. The citywide growth total for Alternative 4 is equivalent to Alternative 2 and Alternative 3, while Alternative 5 and the Preferred Alternative have higher growth. The pattern of growth assumed in Alternative 4 falls between the more concentrated growth of Alternative 2 and more dispersed growth of Alternative 3. Therefore, the potential impacts under Alternative 4 are expected to fall within the results for Alternatives 2, 3, and 5.

Thresholds of Significance

This section outlines the thresholds used to determine the impacts of No Action Alternative, as well as the four action alternatives. The expected conditions under the No Action Alternative are used as the baseline against which each of the action alternatives (Alternatives 2 through 5 and the Preferred Alternative) are measured. In addition to the quantitative thresholds defined below, potential impacts to active transportation and safety are addressed qualitatively.

A significant transportation impact under the No Action Alternative is identified if:

- A subarea would have a percentage of SOV travel exceeding the target stated in the Seattle 2035 Comprehensive Plan.
- A study route would operate over the transit agency crowding threshold.
- VMT per capita exceeds the existing level.
- A corridor would have a travel time LOS grade of F.
- A screenline would exceed the V/C threshold stated in the *Seattle 2035* Comprehensive Plan by at least 0.01.
- A signalized intersection would operate at LOS E or F and an unsignalized intersection would operate at LOS F.
- A state facility does not meet the standard set by WSDOT.

A significant transportation impact under the ~~four~~ action alternatives is identified if:

- A subarea that does not exceed its SOV mode share target under the No Action Alternative would exceed its SOV mode share target or a subarea that exceeds its SOV mode share target under the No Action Alternative would have an increase in SOV mode share of at least 1% compared to the No Action Alternative.
- A study route that would operate at or under the transit agency crowding threshold under the No Action Alternative would operate over the transit agency crowding threshold or a study route identified as operating over the transit agency crowding threshold under the No Action Alternative would have an increase in passenger load of at least 5% compared to the No Action Alternative.
- VMT per capita would exceed the VMT per capita under the No Action Alternative.

- A corridor that would have a travel time LOS grade of A-E under the No Action Alternative would operate at LOS F or a corridor that would have a travel time LOS grade F under the No Action Alternative would have an increase in travel time of at least 5%.
- A screenline that would not exceed the V/C threshold under the No Action Alternative would exceed the V/C threshold or a screenline that would exceed the V/C threshold under the No Action Alternative would increase the V/C ratio by at least 0.01.
- The action alternative would cause an intersection that operated acceptably under No Action Alternative to operate unacceptably, or the action alternative would add at least a 5 second delay from the No Action Alternative at an intersection that operated unacceptably under the No Action Alternative.
- A state facility that would meet WSDOT's standards under the No Action Alternative would exceed WSDOT's standards or a state facility that does not meet WSDOT's standards under the No Action Alternative would increase the volume-to-LOS service volume ratio by at least 0.01 compared to the No Action Alternative.

Impacts Common to All Alternatives

The following section describes impacts common to all alternatives.

Active Transportation

SDOT is continually planning and implementing improvements to active transportation facilities through various plans and programs such as ~~through the Pedestrian Master Plan (PMP), Bicycle Master Plan (BMP),~~the Vision Zero safety programs, ~~and~~ subarea planning efforts, and the recently adopted Seattle Transportation Plan (STP). ~~The modal plans are currently being integrated into a citywide transportation plan that will bring together the individual plans into a single document.~~

As described in the **Affected Environment** section, SDOT has identified ~~the PMP identifies a Priority Investment Network (PIN) which designates~~many street segments that should be prioritized for investment. However, the ability to implement investments is constrained by the high cost of infrastructure. ~~SDOT publishes a BMP Implementation Plan every two years detailing the infrastructure projects that will be constructed over the following four years.~~ It is assumed that the City will continue to implement ~~both~~ its envisioned ~~PMP and BMP~~pedestrian and bicycle network under whichever alternative is pursued, though the pace of improvements will vary over time depending on funding availability. Sound Transit's light rail extensions to Ballard and West Seattle are planned to be complete by 2044, providing frequent, high-capacity service to more neighborhoods in Seattle. The Link extensions would construct stations in ten new locations and reconstruct or expand upon existing facilities at several other station areas. These projects will include investments to the pedestrian and bicycle connections to the station areas.

The City's emphasis on prioritizing neighborhoods with historical underinvestment will continue to guide future decisions on where improvements are focused; the discussion of

equity considerations in the preceding section indicates neighborhoods where priority populations and improvement needs intersect. Among many other factors, the planning process for active transportation network improvements will also consider changes in land use patterns for continued prioritization and phasing of infrastructure projects. Those areas of focus may vary to some degree depending on which alternative is selected.

A GIS analysis was completed to quantify how each action alternative would perform in terms of concentrating growth in areas with the highest access to active transportation facilities. Population data under each alternative was compiled by high, medium, and low sidewalk connectivity census tracts, as was presented in **Exhibit 3.10-13**.

Exhibit 3.10-32 summarizes the percentage of Seattle's population within each category ~~under~~ for each alternative. This analysis shows that ~~under~~ for all future alternatives, including the No Action Alternative, the percentage of people living within high connectivity census tracts would increase compared to existing conditions. Alternative 1, No Action, and Alternative 2 would have the greatest concentration of population within high sidewalk connectivity areas. Alternatives 3 and 5 would also result in an increase, but not as high as for the other alternatives and the Preferred Alternative would fall between those bookends.

Exhibit 3.10-32. Population within Low, Medium, and High Sidewalk Connectivity Census Tracts

	Low (≤ 0.5)	Medium (>0.5; ≤ 0.75)	High (>0.75)
Existing	19.5%	17%	64%
Alternative 1, No Action	17%	16%	68%
Alternative 2	17%	16%	68%
Alternative 3	18%	16%	66%
Alternative 5	18%	16%	66%
Preferred Alternative	18%	15%	67%

Note: The Preferred Alternative was added to this exhibit since the Draft EIS—no edits were made to Alternatives 1–5.
Source: Fehr & Peers, 2023~~3~~4.

Exhibit 3.10-33 summarizes the percentage of jobs in Seattle within each category of census tract ~~under~~ for each alternative. These results are much more consistent across alternatives as the concentrations of employment growth are not assumed to vary as much as housing growth. All future year alternatives would result in 75% of employment within high connectivity census tracts, 9% within medium connectivity census tracts, and 16% within low connectivity census tracts.

Exhibit 3.10-33. Employment within Low, Medium, and High Sidewalk Connectivity Census Tracts

	Low (≤ 0.5)	Medium (>0.5; ≤ 0.75)	High (>0.75)
Existing	16%	9%	76%
Alternative 1, No Action	16%	9%	75%
Alternative 2	16%	9%	75%
Alternative 3	16%	9%	75%
Alternative 5	16%	9%	75%
Preferred Alternative	16%	9%	75%

Note: The Preferred Alternative was added to this exhibit since the Draft EIS—no edits were made to Alternatives 1–5.
Source: Fehr & Peers, 2023~~3~~4.

A summary of population and employment within a quarter mile of the All Ages and Abilities bicycle network is shown in **Exhibit 3.10-34**. The existing All Ages and Abilities network can be found in **Exhibit 3.10-16** with future year changes displayed in **Exhibit 3.10-31**.

All future year alternatives, including the No Action Alternative, show an increase in the percentage of population and employment within a quarter-mile of the All Ages and Abilities bike network as compared to existing conditions. Of the ~~four~~ modeled future year alternatives, Alternative 1 would have~~has~~ the greatest percentage of population and employment growth within a quarter-mile of the All Ages and Abilities bike network. Though Alternative 1, No Action, would have the highest percentage of employment within a quarter-mile of the All Ages and Abilities bike network, the other action alternatives would be very similar. The Preferred Alternative would have the lowest percentage of population within a quarter-mile of the All Ages and Abilities bike network~~; however, the share is just slightly above the three action alternatives~~.

Exhibit 3.10-34. Population and Employment within ¼ Mile of the All Ages and Abilities Bike Network

	Population	Employment
Existing	68%	84%
Alternative 1, No Action	76%	88%
Alternative 2	75%	87%
Alternative 3	75%	87%
Alternative 5	75%	87%
Preferred Alternative	73%	87%

Note: The Preferred Alternative was added to this exhibit since the Draft EIS—no edits were made to Alternatives 1–5.
Source: Fehr & Peers, 2023~~3~~4.

The number of people walking and biking will continue to increase compared to existing conditions even under currently adopted policies. Therefore, under the No Action Alternative, there would be more demand for active transportation facilities throughout the city, including areas that lack sidewalks, curb ramps, pedestrian crossings, and dedicated bicycle facilities. Capacity constraints on pedestrian and bicycle facilities are rare and are typically only a concern at bottlenecks such as pathways across bridges or areas of extremely high pedestrian activity. However, there are many locations throughout the city that would benefit from improvements to make walking and biking safer and more comfortable.

The action alternatives considered in this EIS are not expected to preclude any planned pedestrian and bicycle improvements and would likely result in improved infrastructure as new development projects would be subject to city standards for frontage improvements. As shown by the GIS analysis, the relative shares of growth within areas of high pedestrian and bicycle infrastructure access have slight differences across the alternatives. Compared to the No Action Alternative, there are slightly higher percentages of population within low pedestrian connectivity areas under Alternative 3, ~~and~~ Alternative 5, and the Preferred Alternative. Additionally, all action alternatives have a slightly lower percentage of population and employment within ¼ mile of the All Ages and Abilities bike network compared to the No Action Alternative.

Because the action alternatives would result in higher levels of growth than the No Action Alternative, there would be more people walking and biking in areas with existing network gaps, affecting the comfort, convenience, and willingness of those vulnerable users to travel by active transportation modes and potentially making it more difficult to reach the City's mode share targets. However, from a regional perspective, accommodating more growth within Seattle may provide access to better active transportation amenities as more suburban locations may have less pedestrian and bicycle infrastructure than Seattle. Therefore, at this programmatic level of evaluation and considering both the local and regional effects of accommodating more growth in Seattle, the impact to pedestrian and bicycle travel is not considered to rise to a level of significance.

Freight Mobility & Access

Because this is a programmatic EIS for all of Seattle, it studies citywide land use and zoning changes, rather than a project-specific proposal. Whichever alternative is implemented would result in a wide range of individual projects implemented over a long timeframe and across the city. Because the specific locations and sizes of development are unknown, it is not possible to specify how freight may be impacted by changes to loading zones or access needs at particular locations. These are potentially significant impacts that would need to be analyzed and mitigated at the project level.

The relative differences in traffic congestion described in the Roadway Users sections under each alternative are relevant to freight mobility. While these results provide an indication of relative delays expected among the alternatives, these effects may be more challenging for

freight as traffic congestion is more difficult for large trucks to navigate and trucks typically travel at slower speeds than general purpose traffic.

The alternatives under consideration are not expected to materially affect rail operations. The railroads running through the city are privately ~~operated~~ owned and regularly adjust their operations to respond to changing needs.

Safety

Seattle's Vision Zero policy aims to eliminate traffic-related fatalities and serious injuries by 2030. This goal, and the policies and strategies supporting it, will be pursued regardless of which land use alternative is selected. Some strategies can be applied citywide, for example reducing speed limits and implementing leading pedestrian intervals (LPIs) that give people walking additional time to begin crossing the street before vehicles proceed. Other strategies are more location-specific depending on the context and could include traffic calming treatments, new traffic signals, separation of facilities for vulnerable users, and other physical changes to transportation facility design. As is current practice, SDOT will continue to monitor traffic safety and act to address areas of high need particularly for the most vulnerable users. As safety improvements continue to be implemented over the next two decades, it is expected that the safety program will result in safer conditions at many locations, potentially leading to decreased likelihood of traffic fatalities and serious injuries at those locations.

Relative to the No Action Alternative, the action alternatives would result in between 1% and 3.3~~1~~% more vehicle miles traveled due to higher levels of growth assumed. In terms of relative exposure among the action alternatives, Alternative 5 and the Preferred Alternative are ~~is~~ expected to be on the high end of that range while Alternatives 2 and 3 would be on the lower end. Alternative 4 would be within that range and likely closer to Alternatives 2 and 3 because of the similarity in total assumed growth. Increased VMT could potentially result in an increased number of collisions. Likewise, the increase in people walking and biking could increase exposure to the most vulnerable travelers. While the increasing number of travelers inherently increases the potential exposure to collisions, there is no evidence that the collision rate (i.e., the likelihood of a collision at a particular location) would increase. From a regional perspective, accommodating more growth within Seattle may provide safety benefits as more suburban locations may have less pedestrian and bicycle infrastructure than Seattle. Other factors may improve safety, for example the expected decrease in vehicle speeds may limit the severity of crashes and the action alternatives may result in more safety project implementation due to additional frontage improvements and a larger tax base.

Site-specific issues cannot be addressed at this level of analysis. However, regardless of the alternative selected, individual development applications would be reviewed through the City's permitting process, at which time the City may identify required safety features for the specific site. Due to the increase in people traveling by all modes relative to the No Action Alternative, a potential safety impact is identified under all action alternatives. However, at this programmatic level of evaluation and given the potentially counteracting factors influencing

safety among the alternatives, the impact of the action alternatives relative to the No Action Alternative is not considered to rise to a level of significance.

Ferry Service

All of the alternatives could result in additional development near Washington State Ferries (WSF) and King County ferry terminals which could result in minor adverse impacts to staging, load, drop-off, and other activities. These impacts would be minor due to existing facilities for staging of cars, opportunities for project specific mitigation, and limitations on development in shoreline environment. Impacts might be larger, but still minor, for those alternatives that focus growth near transit services such as Alternative 4 and 5 and the Preferred Alternative.

Equity & Climate Vulnerability Considerations

The City of Seattle has undertaken many recent efforts to understand and analyze race and social justice, as it relates to access to opportunities, equity, and climate vulnerability. The Seattle Racial and Social Equity Index combines data on race, ethnicity, and related demographics with data on socioeconomic and health disadvantages to identify neighborhoods with large proportions of priority populations.[89] In many cases, locations with large proportions of priority populations are correlated to locations that lack comfortable transportation facilities, including sidewalks and access to bicycle facilities. A similar pattern is shown in the City's Access to Opportunity Index which includes access to frequent bus service and light rail/streetcar among other criteria.

In many neighborhoods there is a strong connection between demographic variables identified in the Racial and Social Equity Index and sidewalk connectivity. The Racial and Social Equity Composite Index shows that South Seattle, including Columbia City, Beacon Hill, and Rainier Valley have the highest or second highest equity priority. A similar geographic pattern is reflected in the sidewalk connectivity map, which shows low or medium connectivity in these communities. Similarly, the Delridge neighborhood shows the highest equity priority and ranks as low to medium connectivity for network completion. On the opposite end of Seattle, North Seattle near Shoreline has the highest or second highest equity priority composites, while these areas are also identified as low sidewalk connectivity. Comparatively, neighborhoods in areas that have the lowest or second lowest composite scores, including Ballard, Fremont, Laurelhurst, Magnolia, Capitol Hill, and West Seattle, have high sidewalk connectivity. Providing additional housing growth in areas with more complete infrastructure could advance equity by expanding the opportunity for more people to live in those areas. From that perspective, all of the action alternatives could advance equity by providing more housing opportunities throughout the city with Alternative 5 and the Preferred Alternative providing the most opportunity through their~~its~~ higher housing targets.

[89] City of Seattle. "City of Seattle Racial and Social Equity Index Viewer." https://population-and-demographics-seattlecitygis.hub.arcgis.com/apps/SeattleCityGIS::racial-and-social-equity-index-viewer/explore

There are similar correlations when comparing the Racial and Social Equity Composite Index to access to the All Ages and Abilities bicycle network. However, due to recent investment by the City of Seattle, many areas with the highest equity priority are located within one-quarter mile of the All Ages and Abilities network, including South Seattle and Delridge. While access is provided to many neighborhoods, as previously noted, gaps in the network are often a barrier to bicycle connectivity.

An important consideration for climate vulnerability and health disparities is the distribution of effects from emissions, generated by personal and freight vehicles. Underserved communities often face the highest effects of vehicle emissions; for example, freight traffic emissions or poor air quality due to close proximity heavily congested roadways and freeways. Total VMT generated by each alternative was estimated using the SoundCast model. The action alternatives are expected to result in higher VMT than the No Action Alternative due to the increased growth levels. The increase for Alternatives 2 and 3 is expected to be approximately 1% higher than the No Action Alternative and for Alternative 5 and the Preferred Alternative are~~is~~ expected to be approximately 3% higher. Alternative 4 would fall within that range and likely most similar to Alternatives 2 and 3. Therefore, it is possible that the action alternatives—Alternative 5 and the Preferred Alternative in particular—could result in additional vehicle emissions near underserved communities along high vehicle emissions roadways. See **Section 3.1 Earth & Water Quality** and **Section 3.2 Air Quality & GHG Emissions** for a comprehensive evaluation of the potential effects of increased VMT on water and air quality.

From a regional perspective, accommodating more growth within dense urban areas like Seattle provides better climate outcomes than if that growth were accommodated elsewhere. People living in urban areas tend to generate lower VMT than those in suburban or rural locations. One key factor is the modal choices available; people living in cities tend to walk, bike, and take transit more often as those modes are more readily available and convenient within dense areas. In addition, trips that are made by car tend to be shorter because residents are generally in closer proximity to their destinations (e.g., school, shopping, or commute trips). Therefore, at a regional scale, concentrating more growth within Seattle is expected to lead to travel behaviors with lower impacts to climate vulnerability than if that growth occurred in outlying areas. Because all of the action alternatives would accommodate more growth than the No Action Alternative, they are expected to result in better climate outcomes with Alternative 5 and the Preferred Alternative providing the most benefit as theyit would accommodate the highest level of housing growth within Seattle.

Impacts of Alternative 1: No Action

This section summarizes the analysis results and potential impacts of Alternative 1, No Action. Alternative 1 serves as the baseline for identifying impacts of the action alternatives. It represents the operation of the transportation system if no zoning changes were made. However, growth would continue to occur under Alternative 1 consistent with current adopted zoning as described in **Chapter 2**.

Seattle Transportation Plan & Alternative 1, No Action

The Alternative 1, No Action, results described in this section are those produced for the Draft EIS, before the Seattle Transportation Plan was adopted. This version of the No Action Alternative is used as the baseline for identifying impacts of Alternatives 2, 3, 4, and 5.

The Impacts of Preferred Alternative section includes a revised evaluation of Alternative 1, No Action, that includes the network maps, policy direction, and candidate projects from the adopted STP. This updated Alternative 1, No Action, is used as the baseline for impacts evaluation of the Preferred Alternative.

Mode Share

The mode share expected to occur under Alternative 1 is summarized by subarea in **Exhibit 3.10-35**. The model predicts that SOV mode shares will decrease by 2044, with changes ranging from approximately five to thirteen percent depending on the subarea. The largest decreases are expected in the Downtown/Lake Union and Capitol Hill/Central District subareas. Most subareas are expected to meet their SOV mode share targets under the 2044 Alternative 1 scenario. The exception is Duwamish where shifts to non-SOV modes are more difficult to achieve given the travel needs of the manufacturing and industrial land uses in that area. Therefore, a mode share impact is expected in one subarea under Alternative 1.

Exhibit 3.10-35. PM Peak Hour SOV Mode Share—Alternative 1, No Action

Subarea	SOV Target	Existing SOV Share	Alternative 1, No Action, SOV Share
(1) Northwest Seattle	37%	42%	34%
(2) Northeast Seattle	35%	35%	26%
(3) Queen Anne/Magnolia	38%	42%	34%
(4) Downtown/Lake Union	18%	24%	11%
(5) Capitol Hill/Central District	28%	37%	27%
(6) West Seattle	35%	41%	35%
(7) Duwamish	51%	72%	67%
(8) Southeast Seattle	38%	36%	31%

Note: Existing (2017-2019) mode share data from the PSRC household travel survey have substantial margins of error. See **Exhibit 3.10-10** for margins of error by subarea.
Source: Fehr & Peers, 2023.

Exhibit 3.10-36 compares the number of person trips expected by mode over the course of a day under existing conditions and 2044 Alternative 1. At the citywide level, the number of person trips is expected to increase by approximately 42% by 2044. However, the increase in trips by mode varies substantially. Growth in transit trips is expected to be highest among all modes with daily trips more than doubling; this would bring the transit mode share from the current 11% to 19% in 2044. While trips made by SOV and HOV would increase, the rate of growth would be much lower at 10% and 23%, respectively, decreasing the overall mode shares by 2044. In other words, while a substantial new number of trips are expected as population and employment increases in Seattle, travel behavior is expected to shift such that people choose to ride transit, walk, or bike in larger shares than currently occurs.

Exhibit 3.10-36. Daily Person Trips by Mode—Alternative 1, No Action

	Existing		Alternative 1, No Action	
Mode	Person Trips	Mode Share	Person Trips	Mode Share
SOV	1,624,000	40%	1,783,000	31%
HOV	1,169,000	28%	1,440,000	25%
Transit	465,000	11%	1,138,000	19%
Walk	776,000	19%	1,378,000	24%
Bike	71,000	2%	99,000	2%
Total	**4,105,000**	**100%**	**5,838,000**	**100%**

Source: Fehr & Peers, 2023.

The shift in mode shares predicted by the SoundCast model reflects trends observed over the decade preceding the pandemic. According to SDOT's 2021 Traffic Report, average daily traffic volumes remained essentially flat over the 2009-2019 period despite a 24% increase in the City's population and a 23% increase in regional employment.[90] During that time, average regional transit ridership grew at roughly the same rate as population and employment. The limited vehicle traffic growth projected by 2044 also reflects the constraints of the roadway system as many roadways already operate with considerable congestion during peak periods.

Transit

Passenger loads on key transit connections were forecasted for the PM peak hour. **Exhibit 3.10-37** summarizes the projected load factors on the busiest segment of each route in the peak direction of travel. Therefore, the conditions indicated here are conservatively high as all other segments on each route would operate with lower passenger volumes.

[90] Seattle Department of Transportation. 2022. "2021 Traffic Report." https://www.seattle.gov/documents/Departments/SDOT/About/DocumentLibrary/Reports/2021_Traffic_Report_ADA_21522.pdf

The table includes the Link light rail lines that will run through Seattle by 2044 as well as planned RapidRide routes. These include routes serving the same corridors as Routes 40 and 62 which were both found to reach the crowding threshold under existing conditions. Route 40 is now represented as RapidRide Fremont and Route 62 is now represented as RapidRide 65th.

Based on the transit ridership levels projected by the SoundCast model, eight of the sixteen studied routes (shown in bold in **Exhibit 3.10-37**) would exceed the crowding threshold on their busiest segments in the peak direction during the peak hour, constituting an impact under Alternative 1.

Exhibit 3.10-37. PM Peak Hour Maximum Passenger Load Factors—Alternative 1, No Action

Transit Route	Maximum Passenger Load Factor in Peak Direction
Link light rail—1 Line	**1.08**
Link light rail—2 Line	**1.29**
Link light rail—3 Line	**1.29**
RapidRide C Line—Westwood Village to Alaska Junction	0.71
RapidRide E Line—Downtown to Aurora Village	**1.89**
RapidRide G Line—Downtown to Madison Valley	0.35
RapidRide H Line—Alki to Burien	0.77
RapidRide J Line—Downtown to University District	**1.97**
RapidRide R Line—Downtown to Rainier Valley	**1.07**
RapidRide 23rd	0.47
RapidRide 65th (replaces Route 62)	0.82
RapidRide Beacon	0.50
RapidRide Denny	**2.83**
RapidRide Fremont (replaces Route 40)	**1.49**
RapidRide Green Lake	0.47
RapidRide Market	0.76

Source: Fehr & Peers, 2023.

Roadway Users

Under Alternative 1, growth would continue to occur resulting in increased vehicle volumes—both passenger vehicles and trucks. However, traffic volume growth rates during the PM peak hour are expected to be low. This is consistent with traffic growth patterns over the decade preceding the pandemic, as described earlier in this section. As growth throughout the city continues, the transportation system will likely experience "peak spreading." Peak spreading refers to travelers shifting the times they travel to avoid the heaviest traffic congestion. The

result is that while the peak hour may retain similar characteristics, the length of the congested period may grow.

VMT / VHT / Average Trip Speed

Exhibit 3.10-38 summarizes several citywide metrics for Alternative 1 relative to the existing condition. Total daily VMT generated by Seattle is expected to increase 10% between current conditions and 2044. However, the increase in the number of residents and workers assumed within the city would be higher at 38%; therefore, the VMT per capita would decrease from approximately 17.2 miles per day to 13.7 miles per day, a 20% decrease. This decrease is reflecting a change in travel behavior in terms of mode choice as well as average trip lengths decreasing as people do not have to travel as far, for instance between their home and work locations.

Seattle Transportation Plan VMT Target

The Seattle Transportation Plan targets a 37% reduction in VMT by 2044 (relative to a 2018 baseline). However, the PSRC regional travel demand model used for this EIS suggests increases in total VMT for all future year scenarios. To move toward a decreasing VMT trend, the City of Seattle would need to pursue additional strategies related to equitable demand management through vehicle pricing; parking supply and pricing; investments to maximize the comfort, convenience, and reliability of walking, rolling, and riding transit; and land use coordination to increase transit-oriented development. Additional information may be found in Section 3.10.3 Mitigation Measures.

Similarly, VHT is projected to increase in total compared to existing conditions but would slightly decrease on a per capita basis. By 2044, the average resident/worker is expected to spend approximately half an hour traveling by private car or truck; this metric does not include bus travel. The ratio of VMT to VHT represents the average speed of trips made by Seattle residents and workers, including on the highway system and local streets. That metric is projected to decrease from 30mph under existing conditions to 28mph in 2044, reflecting higher levels of congestion.

Exhibit 3.10-38. Daily VMT, VHT, and Average Trip Speed—Alternative 1, No Action

	Existing		Alternative 1, No Action	
Metric	Total	Per Capita	Total	Per Capita
VMT	22,203,300	17.2	24,357,100	13.7
VHT	741,900	0.6	865,800	0.5
Average Trip Speed	29.9	—	28.1	—

Source: Fehr & Peers, 2023.

Because the VMT per capita would not exceed the existing levels, no impact to VMT per capita is identified under Alternative 1.

Travel Time

Exhibit 3.10-39 summarizes existing PM peak hour corridor travel times as well as those forecasted to occur under 2044 Alternative 1.[91] **Exhibit 3.10-40** shows the LOS values along associated corridors on the map. Corridor travel times are expected to increase by up to 2.5 minutes compared to existing conditions. The largest increases are expected on Boren Avenue, 23rd Avenue, and Martin Luther King, Jr Way South. Under existing conditions, 81 study corridors (with each direction counted separately) would operate at LOS A-C, 15 would operate at LOS D, 4 would operate at LOS E, and 4 would operate at LOS F. By 2044, LOS levels would shift to have 77 corridors operating at LOS A-C, 15 at LOS D, 8 operating at LOS E, and 4 operating at LOS F. Therefore, travel time impacts are expected under Alternative 1on four corridors (shown in bold in **Exhibit 3.10-39**):

- Mercer Street between Elliott Avenue W and Fairview Avenue N
- Stewart Street between 1st Avenue and Denny Way
- Olive Way between 4th Avenue and Denny Way
- S Michigan Street between E Marginal Way S and Airport Way S

[91] For corridors with peak directional patterns, the AM peak hour would typically reflect similar conditions in the opposite direction from those shown for the PM peak hour.

Exhibit 3.10-39. PM Peak Hour Travel Time Corridor Level of Service—Alternative 1, No Action

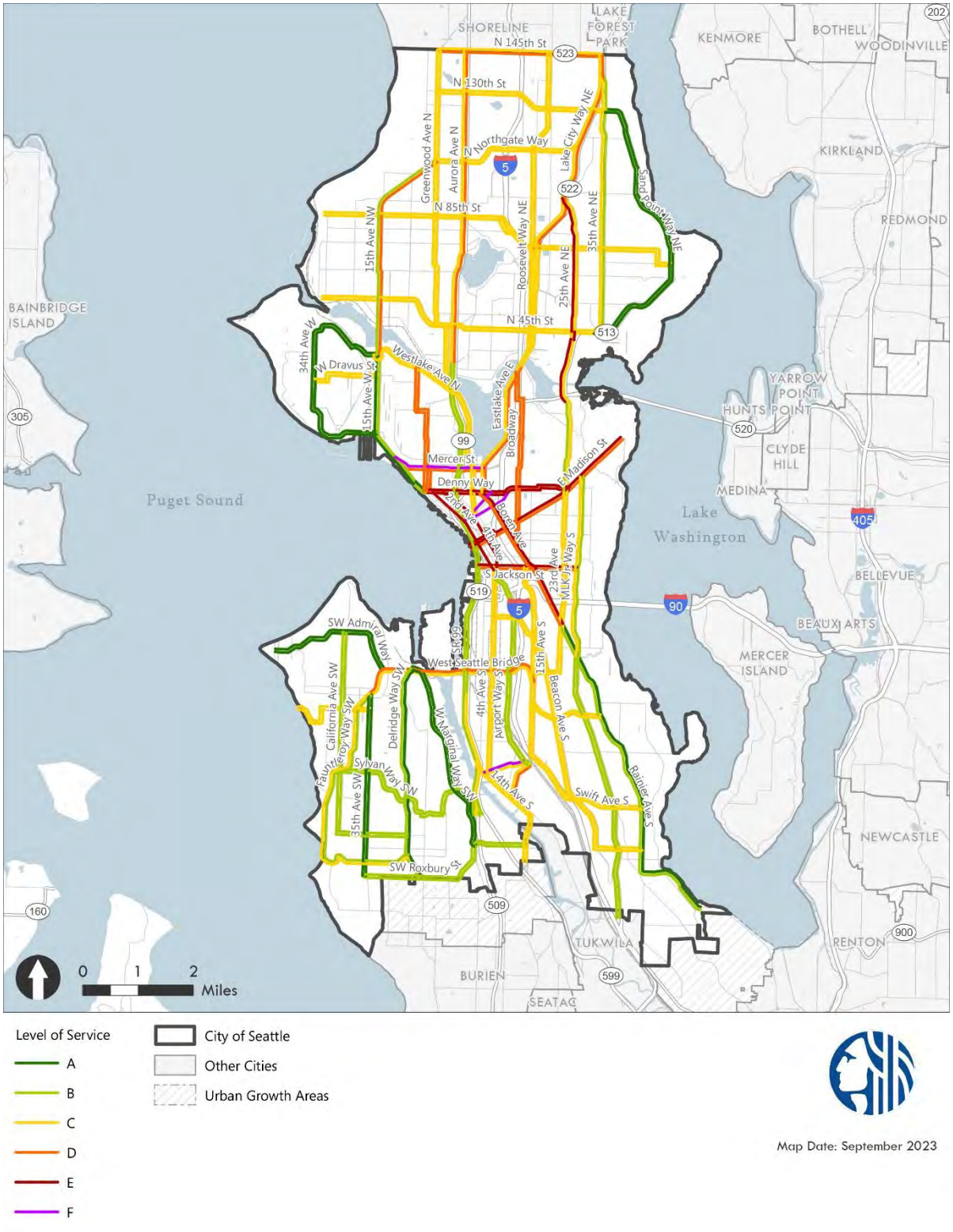
		Existing Conditions Minutes / Level of Service		Alternative 1, No Action, Minutes / Level of Service	
Roadway	Extents	N/E	S/W	N/E	S/W
N 145th St	Greenwood Ave N to Lake City Way NE	10 / D	9.5 / C	10.5 / D	9.5 / C
N 130th St	Greenwood Ave N to 35th Ave NE	11.5 / C	12 / C	11.5 / C	12 / C
N Northgate Way	Greenwood Ave N to Lake City Way NE	10.5 / C	10.5 / C	10.5 / C	11 / C
N 85th St	32nd Ave NW to Sand Point Way NE	24.5 / C	24.5 / C	25 / C	24.5 / C
N 45th St	32nd Ave NW to Union Bay Pl NE	23.5 / C	23.5 / C	24.5 / C	23.5 / C
15th Ave NW	W Emerson St to N 105th St	16 / D	10.5 / B	17 / D	11.5 / B
Greenwood Ave N	Nickerson St to N 145th St	26 / C	24 / C	27 / C	25 / C
Aurora Ave N	N 38th St to N 145th St	18.5 / C	15 / C	19 / D	16.5 / C
Roosevelt Way NE	Fuhrman Ave E to N 145th St	22 / C	20.5 / B	23 / C	21.5 / C
Lake City Way NE	NE 75th St to N 145th St	13.5 / D	10 / C	14 / D	11 / C
25th Ave NE	E Roanoke St to Lake City Way NE	14 / C	21 / D	15 / C	22.5 / E
35th Ave NE	Union Bay Pl NE to Lake City Way NE	16.5 / B	17 / B	16.5 / B	17.5 / C
Sand Point Way NE	Union Bay Pl NE to 35th Ave NE	12.5 / A	12 / A	12.5 / A	12 / A
34th Ave W	15th Ave W to15th Ave W	11.5 / A	12 / A	11.5 / A	12 / A
W Dravus St	34th Ave W to15th Ave W	5 / C	4.5 / C	5 / C	4.5 / C
15th Ave W	Queen Anne Ave N to W Emerson St	9 / B	7.5 / A	8.5 / B	8 / A
Queen Anne Ave N	Denny Way to Nickerson St	12.5 / D	11.5 / C	12.5 / D	12 / D
SR 99	S Nevada St to N 38th St	13.5 / C	15 / C	11.5 / B	12.5 / B
Westlake Ave N	Stewart St to W Emerson St	16 / C	17 / C	16 / C	18 / C
Eastlake Ave E	Denny Way to Fuhrman Ave E	11.5 / C	10.5 / C	12 / D	11.5 / C
Broadway	Boren Ave to Eastlake Ave E	17.5 / D	17 / D	18 / D	18.5 / D

Roadway	Extents	Existing Conditions Minutes / Level of Service		Alternative 1, No Action, Minutes / Level of Service	
		N/E	S/W	N/E	S/W
23rd Ave	E Madison St to E Roanoke St	6.5 / C	5 / B	6 / C	5 / B
Mercer St	**Elliott Ave W to Fairview Ave N**	7.5 / C	14 / F	8 / D	**14 / F**
Denny Way	Queen Anne Ave N to E Madison St	17 / E	16 / D	17.5 / E	16.5 / E
2nd Ave	4th Ave S to Denny Way	- / -	11.5 / E	- / -	12 / E
4th Ave	S Jackson St to Denny Way	9 / D	- / -	10 / E	- / -
Stewart St	**1st Ave to Denny Way**	- / -	6 / F	- / -	**6.5 / F**
Olive Way	**4th Ave to Denny Way**	7 / F	- / -	**7 / F**	- / -
E Madison St	Alaskan Way S to McGilvra Blvd E	20 / D	20 / E	20 / D	20 / E
Boren Ave	23rd Ave S to Denny Way	16 / D	14.5 / D	18 / E	15.5 / D
S Jackson St	Alaskan Way S to MLK Jr. Way S	8.5 / D	10.5 / E	8.5 / D	11 / E
23rd Ave	15th Ave S to E Madison St	14 / C	15.5 / C	16.5 / C	17.5 / C
MLK Jr. Way S	Rainier Ave S to E Madison St	10 / B	11 / B	11.5 / B	12 / C
4th Ave S	E Marginal Way S to S Jackson St	12 / C	11.5 / C	13.5 / C	11.5 / C
Airport Way S	S Albro Pl to 4th Ave S	10 / B	10 / B	10.5 / B	10 / B
15th Ave S	S Jackson St to Rainier Ave S	14.5 / C	16 / C	15 / C	16.5 / C
E Marginal Way S	S Holden St to S Nevada St	4.5 / C	4.5 / B	5.5 / C	5 / B
Swift Ave S	Rainier Ave S to S Columbian Way	13 / C	13 / C	14 / C	14 / C
Beacon Ave S	Rainier Ave S to 4th Ave S	21.5 / C	24 / C	22 / C	24.5 / C
MLK Jr. Way S	S Boeing Access Rd to Rainier Ave S	14.5 / A	15.5 / B	16.5 / B	16.5 / B
Rainier Ave S	Cornell Ave S to 23rd Ave S	17.5 / A	20 / B	18.5 / A	20.5 / B
S Michigan St	**E Marginal Way S to Airport Way S**	3.5 / C	4.5 / F	3.5 / C	**4.5 / F**
Ellis Ave S	E Marginal Way S to Airport Way S	3 / D	3.5 / C	3 / D	3.5 / C

Roadway	Extents	Existing Conditions Minutes / Level of Service		Alternative 1, No Action, Minutes / Level of Service	
		N/E	S/W	N/E	S/W
14th Ave S	S Director St to 1st Ave S	7 / C	7 / C	7.5 / C	7 / C
California Ave SW/SW Thistle St	Delridge Way SW to SW Admiral Way	17 / B	17 / B	17 / B	17.5 / B
Fauntleroy Way SW/SW Barton St	Delridge Way SW to 35th Ave SW	15 / B	17 / B	15.5 / B	18 / C
35th Ave SW	SW Roxbury St to Fauntleroy Way SW	8.5 / A	9 / A	8.5 / A	9 / A
Delridge Way SW	SW Roxbury St to W Marginal Way SW	11 / A	13 / B	11.5 / A	13.5 / B
W Marginal Way SW	S Cloverdale St to Delridge Way SW	7.5 / A	8 / A	7.5 / A	8.5 / A
SW Admiral Way	63rd Ave SW to SW Manning St	6.5 / A	7 / A	6.5 / A	7 / A
West Seattle Bridge	35th Ave SW to 15th Ave S	7.5 / C	10 / D	8.5 / C	10 / D
SW Alaska St	Beach Dr SW to 35th Ave SW	7 / C	7.5 / C	7 / C	7.5 / C
Sylvan Way SW	California Ave SW to S Holden St	12 / B	10.5 / A	12 / B	11 / B
SW Roxbury St	35th Ave SW to 14th Ave S	11 / B	10 / B	11.5 / B	10.5 / B

Source: Fehr & Peers, 2023.

Exhibit 3.10-40. Alternative 1, No Action, Travel Time Corridor LOS



Source: Fehr & Peers, 2023.

Screenlines

Exhibit 3.10-41 summarizes PM peak hour screenline V/C ratios for existing conditions and 2044 Alternative 1. On average, the future volume forecasts are approximately ~~ten~~ twelve percent higher than the existing volumes across all locations. Under Alternative 1, there are six screenlines with V/C ratios higher than 0.90 (indicating volumes are approaching capacity) including several at or just over capacity, compared with three in the existing conditions. The screenlines are:

- Ship Canal—Ballard Bridge
- Ship Canal—Fremont Bridge
- Ship Canal—Aurora Avenue N
- Duwamish River—1st Avenue S and 16th Avenue S
- Ship Canal—University and Montlake Bridges
- East of 9th Street

However, no screenlines exceed the established thresholds and therefore no impacts to screenlines are expected under Alternative 1.

Exhibit 3.10-41. PM Peak Hour Screenline Volume-to-Capacity Ratio—Alternative 1, No Action

Screenline	Location	Extents	V/C Threshold	Existing Conditions		Alternative 1, No Action	
				N/E	S/W	N/E	S/W
1.11	North City Limit	3rd Ave NW to Aurora Ave N	1.20	0.68	0.52	0.75	0.65
1.12	North City Limit	Meridian Ave N to 15th Ave NE	1.20	0.47	0.30	0.48	0.39
1.13	North City Limit	30th Ave NE to Lake City Way NE	1.20	0.84	0.47	0.85	0.62
2.00	Magnolia	Magnolia Bridge to W Emerson Place	1.00	0.56	0.61	0.58	0.61
3.11	Duwamish River	West Seattle Bridge & Spokane St	1.20	0.64	0.81	0.72	0.81
3.12	Duwamish River	1st Ave S & 16th Ave S	1.20	0.56	0.87	0.69	0.91
4.11	South City Limit	Martin Luther King Jr. Way to Rainier Avenue S	1.00	0.57	0.75	0.83	0.87
4.12	South City Limit	Marine Dr SW to Meyers Way S	1.00	0.37	0.42	0.44	0.49
4.13	South City Limit	SR 99 to Airport Way S	1.00	0.44	0.45	0.63	0.47
5.11	Ship Canal	Ballard Bridge	1.20	1.01	0.71	1.01	0.90
5.12	Ship Canal	Fremont Bridge	1.20	1.00	0.79	1.00	1.03
5.13	Ship Canal	Aurora Ave Bridge	1.20	0.96	0.58	0.96	0.70
5.16	Ship Canal	University & Montlake Bridges	1.20	0.74	0.79	0.74	0.94
6.11	South of NW 80th St	Seaview Ave NW to 15th Ave NW	1.00	0.37	0.46	0.40	0.52
6.12	South of N W 80th St	8th Ave NW to Greenwood Ave N	1.00	0.57	0.49	0.60	0.62
6.13	South of NE 80th St	Linden Ave N to 1st Ave NE	1.00	0.54	0.49	0.51	0.59
6.14	South of NE 80th St	5th Ave NE to 15th Ave NE	1.00	0.71	0.56	0.65	0.69
6.15	South of NE 80th St	20th Ave NE to Sand Point Way NE	1.00	0.47	0.34	0.41	0.39
7.11	West of Aurora Ave	Fremont Pl N to N 65th St	1.00	0.53	0.65	0.64	0.63
7.12	West of Aurora Ave	N 80th St to N 145th St	1.00	0.41	0.41	0.44	0.45
8.00	South of Lake Union	Valley St to Denny Way	1.20	0.49	0.35	0.50	0.35
9.11	South of Spokane St	Beach Dr SW to W Marginal Way SW	1.00	0.45	0.71	0.51	0.82

Screenline	Location	Extents	V/C Threshold	Existing Conditions		Alternative 1, No Action	
				N/E	S/W	N/E	S/W
9.12	South of Spokane St	E Marginal Way S to Airport Way S	1.00	0.51	0.54	0.65	0.52
9.13	South of Spokane St	15th Ave S to Rainier Ave S	1.00	0.56	0.57	0.69	0.60
10.11	South of S Jackson St	Alaskan Way S to 4th Ave S	1.00	0.61	0.64	0.81	0.82
10.12	South of S Jackson St	12th Ave S to Lakeside Ave S	1.00	0.52	0.64	0.74	0.74
12.12	East of CBD	S Jackson St to Howell St	1.20	0.36	0.36	0.37	0.44
13.11	East of I-5	NE Northgate Way to NE 145th St	1.00	0.67	0.51	0.70	0.53
13.12	East of I-5	NE 65th St to NE 80th St	1.00	0.52	0.54	0.54	0.50
13.3	East of I-5	NE Pacific St to NE Ravenna Blvd	1.00	0.59	0.52	0.61	0.56
A1	North of Seneca St	1st Ave to 6th Ave	N/A	0.47	0.50	0.63	0.65
A2	North of Blanchard	Elliott Ave to Westlake Ave	N/A	0.43	0.31	0.45	0.37
A3	East of 9th Ave	Lenora St to Pike St	N/A	0.46	0.83	0.46	0.94
A4	South of Mercer St	Elliott Ave W to Aurora Ave N	N/A	0.53	0.46	0.55	0.59
A5	East of 5th Ave N	Denny Way to Valley St	N/A	0.40	0.40	0.41	0.37
A6	North of Pine St	Melrose Ave E to 15th Ave E	N/A	0.39	0.32	0.41	0.42
A7	North of James St– E Cherry St	Boren Ave to 14th Ave	N/A	0.46	0.32	0.56	0.39
A8	West of Broadway	Yesler Way to E Roy St	N/A	0.47	0.38	0.55	0.46
A9	South of NE 45th St	7th Ave NE to Montlake Blvd NE	N/A	0.56	0.53	0.54	0.60
A10	East of 15th Ave NE	NE 45th St to NE 52nd St	N/A	0.51	0.48	0.58	0.53
A11	South of Northgate Way (N/NE 110th St)	N Northgate Way to Roosevelt Way NE	N/A	0.44	0.46	0.46	0.54
A12	East of 1st Ave NE	NE 100th St to NE Northgate Way	N/A	0.43	0.48	0.44	0.51

Source: Fehr & Peers, 2023.

Intersection LOS—NE 130th / NE 145th Street Subarea

Exhibit 3.10-42 summarizes the LOS and vehicle delay for each study intersection for Alternative 1. The subarea is expected to experience increased congestion in 2044 compared to current conditions. This can be attributed to the expected growth in population and employment locally and throughout the region. Separate from the model forecasts, the trips from a related project along Aurora Avenue N were added to the intersection forecasts because the growth from the traffic model did not account for all of the anticipated growth from this proposed project. A 145,000 square foot discount warehouse was assumed to generate 610 PM peak hour trips. These were distributed throughout the study area based on a trip distribution pattern from the model for this area. The City of Shoreline also has plans to improve N 145th Street (the city limit between Seattle and Shoreline), which include installing roundabouts at the two ramp intersections with I-5. The analysis is consistent with all planned design changes along N 145th Street.

Under Alternative 1, six intersections are expected to no longer meet the LOS D threshold, constituting a significant impact. These include:

- N 145th Street / Aurora Avenue N
- NE 145th Street / 5th Avenue NE
- NE 145th Street / 15th Avenue NE
- N 130th Street / Aurora Avenue N
- N 130th Street / 1st Avenue NE
- NE 125th Street / 15th Avenue NE

Exhibit 3.10-42. 130th/145th Street Subarea PM Peak Hour Level of Service—Alternative 1, No Action

ID	Intersection	Existing Conditions—Level of Service / Delay (seconds)	Alternative 1, No Action—Level of Service / Delay (seconds)
1	NE 155th St / 5th Ave NE	B / 11	B / 19
2	**N 145th St / Aurora Ave N**	D / 47	**E / 68**
3	N 145th St / Meridian Ave N	E / 58	B / 18
4	N 145th St / 1st Ave NE	C / 21	B / 20
5	NE 145th St / I-5 On & Off Ramps	D / 35	A / 9
6	**NE 145th St / 5th Ave NE**	D / 42	**E / 69**
7	**NE 145th St / 15th Ave NE**	D / 48	**E / 66**
8	N 137th St / Meridian Ave N / Roosevelt Way N	A / 7	A / 7
9	**N 130th St / Aurora Ave N**	D / 51	**E / 79**
10	N 130th St / Meridian Ave N	A / 9	B / 13
11	**N 130th St / 1st Ave NE**	D / 52	**E / 71**
12	NE 130th St / I-5 On Ramp	A / 2	A / 2

ID	Intersection	Existing Conditions—Level of Service / Delay (seconds)	Alternative 1, No Action—Level of Service / Delay (seconds)
13	NE 130th St / Roosevelt Way NE / 5th Ave NE	C / 32	D / 38
14	Roosevelt Way NE / NE 125th St / 10th Ave NE	B / 17	B / 17
15	**NE 125th St / 15th Ave NE**	D / 41	**E / 60**

Note: Intersections that exceed the LOS threshold are shown in bold.
Source: Fehr & Peers, 2023.

State Facilities

Exhibit 3.10-43 includes volume to maximum service volume ratios for state facilities under existing conditions as well as Alternative 1. Nearly all state facilities are expected to have increased volumes by 2044. Under Alternative 1, volumes at seven state facility study locations are expected to exceed the levels required to maintain the WSDOT LOS standard, constituting an impact under Alternative 1. These include:

- I-5 north of NE Northgate Way
- I-5 at the Ship Canal Bridge
- I-5 north of the West Seattle Bridge
- SR 99 north of N Northgate Way
- SR 99 at the Aurora Avenue Bridge
- SR 509 at the 1st Avenue S Bridge
- SR 522 south of NE 145th Street

I-5 north of Boeing Access Rd Ramp and the I-90 Mt Baker Tunnel are both expected to approach the LOS D service volumes, but not surpass the threshold. I-5 at the Ship Canal Bridge and north of the West Seattle Bridge, SR 99 at the Aurora Bridge, and SR 509 at the 1st Avenue Bridge are forecasted to have demand more than 20% over the LOS standard, indicating substantial vehicle congestion for some hours of the day. Because multiple state facilities within the city are expected to exceed WSDOT's LOS D standard, a significant impact to state facilities is expected under Alternative 1.

Exhibit 3.10-43. ~~PM Peak Hour~~Daily State Facilities Level of Service—Alternative 1, No Action

Facility	Extents	WSDOT LOS Standard	Existing Conditions—Volume to Maximum Service Volume Ratio	Alternative 1, No Action—Volume to Maximum Service Volume Ratio
I-5	**North of NE Northgate Way**	D	0.96	**1.03**
I-5	**Ship Canal Bridge**	D	1.21	**≥1.~~3~~20**
I-5	**North of West Seattle Bridge**	D	1.24	**≥1.~~3~~20**

Facility	Extents	WSDOT LOS Standard	Existing Conditions—Volume to Maximum Service Volume Ratio	Alternative 1, No Action—Volume to Maximum Service Volume Ratio
I-5	North of Boeing Access Rd Ramp	D	0.93	0.98
I-90	Mt Baker Tunnel	D	0.90	0.97
SR 99	**North of N Northgate Way**	D	0.96	**1.08**
SR 99	**Aurora Ave Bridge**	D	1.19	**≥1.320**
SR 99	Tunnel	D	0.58	0.65
SR 99	North of West Seattle Bridge	D	0.72	0.76
SR 99	South of S Cloverdale St	E (mitigated)	0.42	0.41
SR 509	**1st Ave S Bridge**	D	0.97	**≥1.250**
SR 519	S Atlantic St West of I-90 Ramps	D	0.90	0.83
SR 520	Lake Washington Bridge	D	0.60	0.86
SR 522	**South of NE 145th St**	D	1.01	**1.15**

Note: Facilities that exceed the LOS threshold are shown in bold.
A ratio of >1.2 indicates a demand of more than 20% over the maximum service volume, indicating substantial vehicle congestion for some hours of the day. The WSDOT standard is equivalent to a 1.0 (the denominator is the maximum volume at which LOS D can be maintained).
Source: Fehr & Peers, 2023.

Impacts of Alternative 2: Focused

Mode Share

Exhibit 3.10-44 summarizes the SOV mode share expected under Alternative 2. The SoundCast model predicts that Alternative 2 SOV mode shares will be essentially the same as Alternative 1 across all eight subareas. Seven of the subareas would still meet their SOV target and although the Duwamish subarea would exceed its target, the difference in mode share relative to Alternative 1 is expected to be less than the 1% impact threshold. Therefore, no mode share impact is expected under Alternative 2.

Exhibit 3.10-44. PM Peak Hour SOV Mode Share—Alternative 2

Subarea	SOV Target	Alternative 1, No Action, SOV Share	Alternative 2 SOV Share
(1) Northwest Seattle	37%	34%	34%
(2) Northeast Seattle	35%	26%	26%
(3) Queen Anne/Magnolia	38%	34%	34%
(4) Downtown/Lake Union	18%	11%	11%

Subarea	SOV Target	Alternative 1, No Action, SOV Share	Alternative 2 SOV Share
(5) Capitol Hill/Central District	28%	27%	27%
(6) West Seattle	35%	35%	35%
(7) Duwamish	51%	67%	67%
(8) Southeast Seattle	38%	31%	31%

Note: Existing (2017-2019) mode share data from the PSRC household travel survey have substantial margins of error. See **Exhibit 3.10-10** for margins of error by subarea.
Source: Fehr & Peers, 2023.

Exhibit 3.10-45 compares the number of daily person trips expected by mode under 2044 Alternative 1 and Alternative 2. Citywide, Alternative 2 is expected to result in approximately 156,000 additional person trips compared to Alternative 1, an increase of 43%. That increase is spread fairly evenly across modes. In other words, while Alternative 2 would result in slightly more trips, the underlying travel behavior and mode shares expected by 2044 is consistent between the alternatives.

Exhibit 3.10-45. Daily Person Trips by Mode—Alternative 2

Mode	Alternative 1, No Action	Alternative 2
SOV	1,783,000	1,847,000
HOV	1,440,000	1,471,000
Transit	1,138,000	1,160,000
Walk	1,378,000	1,414,000
Bike	99,000	102,000
Total	**5,838,000**	**5,994,000**

Source: Fehr & Peers, 2023.

Transit

Passenger loads on key transit connections were forecasted for the PM peak hour. **Exhibit 3.10-46** summarizes the projected load factors on the busiest segment of each route in the peak direction of travel. Passenger loads are expected to increase on most, but not all, routes. Study routes that would have a transit capacity impact under Alternative 2 are shown in bold in **Exhibit 3.10-46**. The impacted routes include:

- RapidRide E Line—Downtown to Aurora Village
- RapidRide J Line—Downtown to University District
- RapidRide R Line—Downtown to Rainier Valley
- RapidRide Fremont

Exhibit 3.10-46. PM Peak Hour Average Passenger Load Factors—Alternative 2

Transit Route	Maximum Passenger Load Factor in Peak Direction	
	Alternative 1, No Action	Alternative 2
Link light rail—1 Line	1.08	1.04
Link light rail—2 Line	1.29	1.31
Link light rail—3 Line	1.29	1.21
RapidRide C Line—Westwood Village to Alaska Junction	0.71	0.78
RapidRide E Line—Downtown to Aurora Village	1.89	**2.22**
RapidRide G Line—Downtown to Madison Valley	0.35	0.40
RapidRide H Line—Alki to Burien	0.77	0.93
RapidRide J Line—Downtown to University District	1.97	**2.64**
RapidRide R Line—Downtown to Rainier Valley	1.07	**1.27**
RapidRide 23rd	0.47	0.50
RapidRide 65th (replaces Route 62)	0.82	0.93
RapidRide Beacon	0.50	0.53
RapidRide Denny	2.83	2.58
RapidRide Fremont (replaces Route 40)	1.49	**1.65**
RapidRide Green Lake	0.47	0.42
RapidRide Market	0.76	0.85

Note: Impacted routes are shown in bold.
Source: Fehr & Peers, 2023.

Roadway Users

This section summarizes roadway conditions expected under Alternative 2.

VMT / VHT / Average Trip Speed

Exhibit 3.10-47 summarizes VMT, VHT, and average trip speed for Alternative 2 relative to Alternative 1. Total daily VMT generated under Alternative 2 is expected to increase by 1.4% compared to Alternative 1. However, the VMT per capita would decrease slightly from approximately 13.7 miles per day to 13.5 miles per day. This incremental difference may reflect slight changes in travel behavior in terms of mode choice and average trip lengths.

Similarly, VHT is projected to increase in total compared to Alternative 1 but would remain flat on a per capita basis at approximately a half hour of daily travel by private car or truck. The average trip speed would also decrease very slightly representing a small increase to levels of congestion on the highway system and local street network.

Exhibit 3.10-47. Daily VMT, VHT, and Average Trip Speed—Alternative 2

	Alternative 1, No Action		Alternative 2	
Metric	Total	Per Capita	Total	Per Capita
VMT	24,357,100	13.7	24,698,900	13.5
VHT	865,800	0.5	882,300	0.5
Average Trip Speed	28.1	—	28.0	—

Source: Fehr & Peers, 2023.

Because the VMT per capita under Alternative 2 would not exceed the level under Alternative 1, no impact to VMT per capita is identified under Alternative 2.

Travel Time

Exhibit 3.10-48 summarizes PM peak hour corridor travel times under Alternative 2 compared to Alternative 1.[92] **Exhibit 3.10-49** displays the LOS values along associated corridors on the map. All corridor travel times are expected to be within 0.5 minutes of Alternative 1 with some corridors seeing slight increases while others seeing slight decreases. Under Alternative 1, 77 corridors (with each direction counted separately) are expected to operate at LOS A-C, 15 at LOS D, 8 operating at LOS E, and 4 operating at LOS F. Under Alternative 2, 76 corridors are expected to operate at LOS A-C, 16 at LOS D, 8 operating at LOS E, and 4 operating at LOS F.

Alternative 1 and Alternative 2 are expected to result in the same four corridors operating at LOS F, one of which would have an increase in excess of the 5% threshold of significance. Therefore, a travel time impact is expected under Alternative 2 on one corridor (shown in bold in **Exhibit 3.10-48**):

- Olive Way between 4th Avenue and Denny Way

[92] For corridors with peak directional patterns, the AM peak hour would typically reflect similar conditions in the opposite direction from those shown for the PM peak hour.

Exhibit 3.10-48. PM Peak Hour Travel Time Corridor Level of Service—Alternative 2

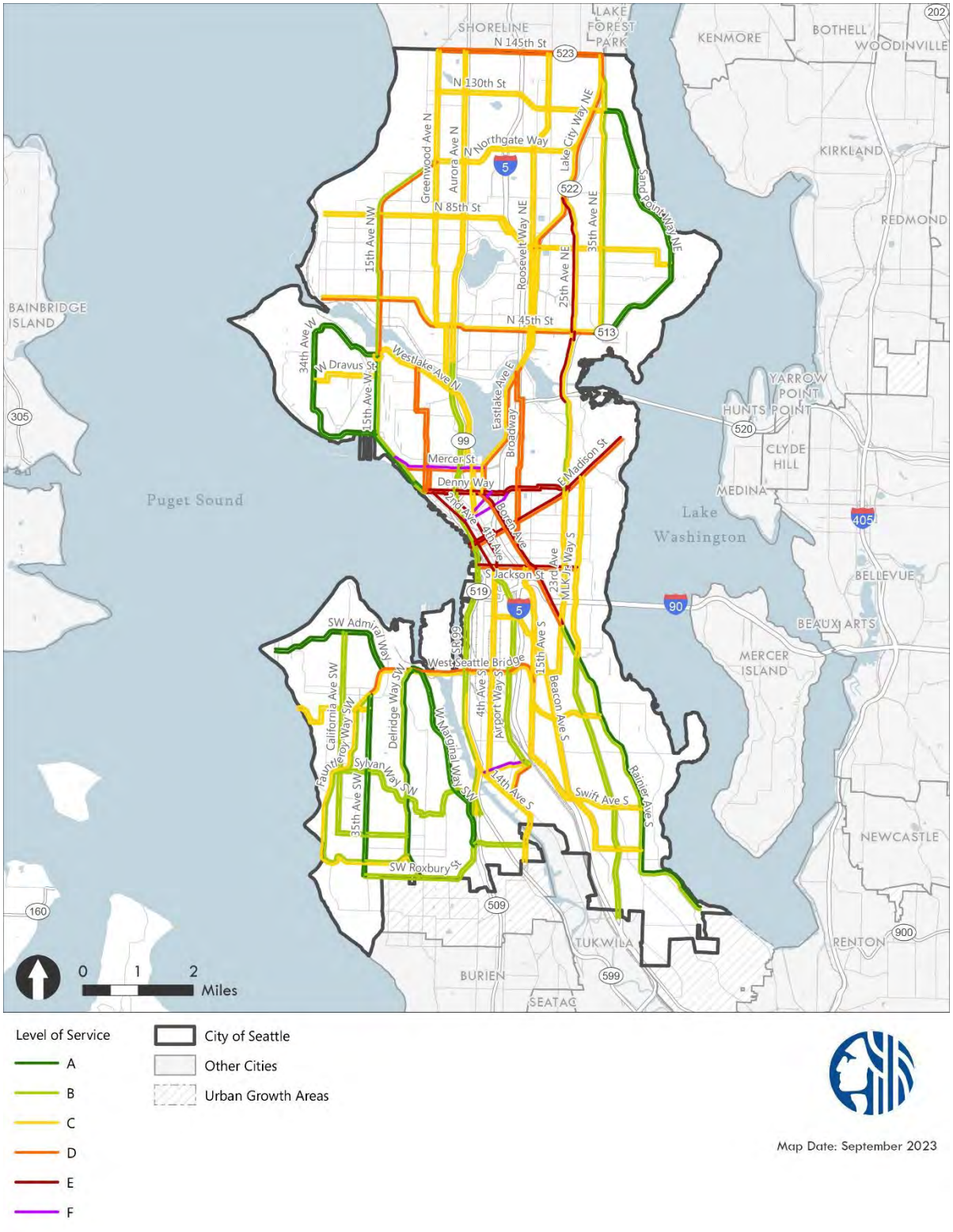
		Alternative 1, No Action Minutes / Level of Service		Alternative 2 Minutes / Level of Service	
Roadway	Extents	N/E	S/W	N/E	S/W
N 145th St	Greenwood Ave N to Lake City Way NE	10.5 / D	9.5 / C	10.5 / D	10 / D
N 130th St	Greenwood Ave N to 35th Ave NE	11.5 / C	12 / C	11.5 / C	12.5 / C
N Northgate Way	Greenwood Ave N to Lake City Way NE	10.5 / C	11 / C	10.5 / C	11 / C
N 85th St	32nd Ave NW to Sand Point Way NE	25 / C	24.5 / C	25 / C	25 / C
N 45th St	32nd Ave NW to Union Bay Pl NE	24.5 / C	23.5 / C	25 / D	24 / C
15th Ave NW	W Emerson St to N 105th St	17 / D	11.5 / B	17 / D	11.5 / B
Greenwood Ave N	Nickerson St to N 145th St	27 / C	25 / C	26.5 / C	25.5 / C
Aurora Ave N	N 38th St to N 145th St	19 / D	16.5 / C	18.5 / C	17 / C
Roosevelt Way NE	Fuhrman Ave E to N 145th St	23 / C	21.5 / C	22.5 / C	22 / C
Lake City Way NE	NE 75th St to N 145th St	14 / D	11 / C	13.5 / D	11 / C
25th Ave NE	E Roanoke St to Lake City Way NE	15 / C	22.5 / E	15 / C	23 / E
35th Ave NE	Union Bay Pl NE to Lake City Way NE	16.5 / B	17.5 / C	16 / B	18 / C
Sand Point Way NE	Union Bay Pl NE to 35th Ave NE	12.5 / A	12 / A	12 / A	12 / A
34th Ave W	15th Ave W to15th Ave W	11.5 / A	12 / A	11.5 / A	12 / A
W Dravus St	34th Ave W to15th Ave W	5 / C	4.5 / C	5 / C	4.5 / C
15th Ave W	Queen Anne Ave N to W Emerson St	8.5 / B	8 / A	8.5 / B	8 / A
Queen Anne Ave N	Denny Way to Nickerson St	12.5 / D	12 / D	12.5 / D	12 / D
SR 99	S Nevada St to N 38th St	11.5 / B	12.5 / B	11.5 / B	12.5 / B
Westlake Ave N	Stewart St to W Emerson St	16 / C	18 / C	16 / C	18.5 / C
Eastlake Ave E	Denny Way to Fuhrman Ave E	12 / D	11.5 / C	12 / D	11.5 / C
Broadway	Boren Ave to Eastlake Ave E	18 / D	18.5 / D	18.5 / D	18.5 / D

Roadway	Extents	Alternative 1, No Action Minutes / Level of Service		Alternative 2 Minutes / Level of Service	
		N/E	S/W	N/E	S/W
23rd Ave	E Madison St to E Roanoke St	6 / C	5 / B	6 / C	5.5 / B
Mercer St	Elliott Ave W to Fairview Ave N	8 / D	14 / F	8 / D	14 / F
Denny Way	Queen Anne Ave N to E Madison St	17.5 / E	16.5 / E	17.5 / E	16.5 / E
2nd Ave	4th Ave S to Denny Way	- / -	12 / E	- / -	12 / E
4th Ave	S Jackson St to Denny Way	10 / E	- / -	10 / E	- / -
Stewart St	1st Ave to Denny Way	- / -	6.5 / F	- / -	6.5 / F
Olive Way	**4th Ave to Denny Way**	7 / F	- / -	**7.5 / F**	- / -
E Madison St	Alaskan Way S to McGilvra Blvd E	20 / D	20 / E	20.5 / D	20.5 / E
Boren Ave	23rd Ave S to Denny Way	18 / E	15.5 / D	18.5 / E	15.5 / D
S Jackson St	Alaskan Way S to MLK Jr. Way S	8.5 / D	11 / E	8.5 / D	11 / E
23rd Ave	15th Ave S to E Madison St	16.5 / C	17.5 / C	16.5 / C	17.5 / C
MLK Jr. Way S	Rainier Ave S to E Madison St	11.5 / B	12 / C	12 / C	12 / C
4th Ave S	E Marginal Way S to S Jackson St	13.5 / C	11.5 / C	13.5 / C	11.5 / C
Airport Way S	S Albro Pl to 4th Ave S	10.5 / B	10 / B	11 / B	10 / B
15th Ave S	S Jackson St to Rainier Ave S	15 / C	16.5 / C	15.5 / C	16.5 / C
E Marginal Way S	S Holden St to S Nevada St	5.5 / C	5 / B	5.5 / C	5 / B
Swift Ave S	Rainier Ave S to S Columbian Way	14 / C	14 / C	14.5 / C	14 / C
Beacon Ave S	Rainier Ave S to 4th Ave S	22 / C	24.5 / C	22 / C	25 / C
MLK Jr. Way S	S Boeing Access Rd to Rainier Ave S	16.5 / B	16.5 / B	16.5 / B	16 / B
Rainier Ave S	Cornell Ave S to 23rd Ave S	18.5 / A	20.5 / B	18.5 / A	20.5 / B
S Michigan St	E Marginal Way S to Airport Way S	3.5 / C	4.5 / F	3.5 / C	4.5 / F
Ellis Ave S	E Marginal Way S to Airport Way S	3 / D	3.5 / C	3 / D	3.5 / C

Roadway	Extents	Alternative 1, No Action Minutes / Level of Service		Alternative 2 Minutes / Level of Service	
		N/E	S/W	N/E	S/W
14th Ave S	S Director St to 1st Ave S	7.5 / C	7 / C	7.5 / C	7 / C
California Ave SW/SW Thistle St	Delridge Way SW to SW Admiral Way	17 / B	17.5 / B	17.5 / B	17.5 / B
Fauntleroy Way SW/SW Barton St	Delridge Way SW to 35th Ave SW	15.5 / B	18 / C	15.5 / B	18 / C
35th Ave SW	SW Roxbury St to Fauntleroy Way SW	8.5 / A	9 / A	8.5 / A	9.5 / A
Delridge Way SW	SW Roxbury St to W Marginal Way SW	11.5 / A	13.5 / B	11.5 / A	13.5 / B
W Marginal Way SW	S Cloverdale St to Delridge Way SW	7.5 / A	8.5 / A	8 / A	8.5 / A
SW Admiral Way	63rd Ave SW to SW Manning St	6.5 / A	7 / A	6.5 / A	7 / A
West Seattle Bridge	35th Ave SW to 15th Ave S	8.5 / C	10 / D	8.5 / C	10.5 / D
SW Alaska St	Beach Dr SW to 35th Ave SW	7 / C	7.5 / C	7 / C	7.5 / C
Sylvan Way SW	California Ave SW to S Holden St	12 / B	11 / B	12 / B	11 / B
SW Roxbury St	35th Ave SW to 14th Ave S	11.5 / B	10.5 / B	11.5 / B	11 / B

Note: Impacted corridors are shown in bold.
Source: Fehr & Peers, 2023.

Exhibit 3.10-49. Alternative 2 PM Peak Hour Travel Time Corridor LOS



Source: Fehr & Peers, 2023.

Screenlines

Exhibit 3.10-50 summarizes PM peak hour screenline V/C ratios for 2044 Alternative 1 and 2044 Alternative 2. The volume forecasts in Alternative 2 are approximately ~~five~~ four percent higher than the Alternative 1 forecasts across all locations. There are six screenlines with V/C ratios higher than 0.90, which is the same as compared with Alternative 1. The screenlines are:

- Ship Canal—Ballard Bridge
- Ship Canal—Fremont Bridge
- Ship Canal—Aurora Ave N
- Duwamish River—1st Ave S and 16th Ave S
- Ship Canal—University and Montlake Bridges
- East of 9th Avenue

While Alternative 2 would cause V/C ratios to increase across many screenlines, none of the screenlines are expected to exceed the established thresholds. Therefore, no significant impacts to screenlines are expected under Alternative 2.

Exhibit 3.10-50. PM Peak Hour Screenline Volume-to-Capacity Ratio—Alternative 2

Screenline	Location	Extents	V/C Threshold	Alternative 1, No Action		Alternative 2	
				N/E	S/W	N/E	S/W
1.11	North City Limit	3rd Ave NW to Aurora Ave N	1.20	0.75	0.65	0.73	0.70
1.12	North City Limit	Meridian Ave N to 15th Ave NE	1.20	0.48	0.39	0.46	0.43
1.13	North City Limit	30th Ave NE to Lake City Way NE	1.20	0.85	0.62	0.83	0.65
2.00	Magnolia	Magnolia Bridge to W Emerson Place	1.00	0.58	0.61	0.62	0.65
3.11	Duwamish River	West Seattle Bridge & Spokane St	1.20	0.72	0.81	0.74	0.86
3.12	Duwamish River	1st Ave S & 16th Ave S	1.20	0.69	0.91	0.69	0.93
4.11	South City Limit	Martin Luther King Jr. Way to Rainier Ave S	1.00	0.83	0.87	0.86	0.89
4.12	South City Limit	Marine Dr SW to Meyers Way S	1.00	0.44	0.49	0.46	0.49
4.13	South City Limit	SR 99 to Airport Way S	1.00	0.63	0.47	0.64	0.48
5.11	Ship Canal	Ballard Bridge	1.20	1.01	0.90	1.06	0.93
5.12	Ship Canal	Fremont Bridge	1.20	1.00	1.03	1.09	1.12
5.13	Ship Canal	Aurora Ave Bridge	1.20	0.96	0.70	0.99	0.73
5.16	Ship Canal	University & Montlake Bridges	1.20	0.74	0.94	0.81	1.00
6.11	South of NW 80th St	Seaview Ave NW to 15th Ave NW	1.00	0.40	0.52	0.40	0.54
6.12	South of N W 80th St	8th Ave NW to Greenwood Ave N	1.00	0.60	0.62	0.61	0.64
6.13	South of NE 80th St	Linden Ave N to 1st Ave NE	1.00	0.51	0.59	0.52	0.62
6.14	South of NE 80th St	5th Ave NE to 15th Ave NE	1.00	0.65	0.69	0.69	0.74
6.15	South of NE 80th St	20th Ave NE to Sand Point Way NE	1.00	0.41	0.39	0.42	0.43
7.11	West of Aurora Ave	Fremont Pl N to N 65th St	1.00	0.64	0.63	0.67	0.66
7.12	West of Aurora Ave	N 80th St to N 145th St	1.00	0.44	0.45	0.45	0.47
8.00	South of Lake Union	Valley St to Denny Way	1.20	0.50	0.35	0.52	0.39

Screenline	Location	Extents	V/C Threshold	Alternative 1, No Action		Alternative 2	
				N/E	S/W	N/E	S/W
9.11	South of Spokane St	Beach Dr SW to W Marginal Way SW	1.00	0.51	0.82	0.53	0.85
9.12	South of Spokane St	E Marginal Way S to Airport Way S	1.00	0.65	0.52	0.66	0.53
9.13	South of Spokane St	15th Ave S to Rainier Ave S	1.00	0.69	0.60	0.71	0.63
10.11	South of S Jackson St	Alaskan Way S to 4th Ave S	1.00	0.81	0.82	0.85	0.86
10.12	South of S Jackson St	12th Ave S to Lakeside Ave S	1.00	0.74	0.74	0.79	0.76
12.12	East of CBD	S Jackson St to Howell St	1.20	0.37	0.44	0.38	0.45
13.11	East of I-5	NE Northgate Way to NE 145th St	1.00	0.70	0.53	0.72	0.54
13.12	East of I-5	NE 65th St to NE 80th St	1.00	0.54	0.50	0.58	0.53
13.3	East of I-5	NE Pacific St to NE Ravenna Blvd	1.00	0.61	0.56	0.67	0.60
A1	North of Seneca St	1st Ave to 6th Ave	N/A	0.63	0.65	0.67	0.67
A2	North of Blanchard	Elliott Ave to Westlake Ave	N/A	0.45	0.37	0.47	0.39
A3	East of 9th Ave	Lenora St to Pike St	N/A	0.46	0.94	0.46	0.95
A4	South of Mercer St	Elliott Ave W to Aurora Ave N	N/A	0.55	0.59	0.58	0.63
A5	East of 5th Ave N	Denny Way to Valley St	N/A	0.41	0.37	0.43	0.42
A6	North of Pine St	Melrose Ave E to 15th Ave E	N/A	0.41	0.42	0.43	0.44
A7	North of James St– E Cherry St	Boren Ave to 14th Ave	N/A	0.56	0.39	0.58	0.41
A8	West of Broadway	Yesler Way to E Roy St	N/A	0.55	0.46	0.58	0.47
A9	South of NE 45th St	7th Ave NE to Montlake Blvd NE	N/A	0.54	0.60	0.57	0.64
A10	East of 15th Ave NE	NE 45th St to NE 52nd St	N/A	0.58	0.53	0.62	0.56
A11	South of Northgate Way (N/NE 110th St)	N Northgate Way to Roosevelt Way NE	N/A	0.46	0.54	0.46	0.57
A12	East of 1st Ave NE	NE 100th St to NE Northgate Way	N/A	0.44	0.51	0.44	0.50

Source: Fehr & Peers, 2023.

Intersection LOS—NE 130th / NE 145th Street Subarea

Exhibit 3.10-51 summarizes the LOS and vehicle delay for each study intersection analyzed based on Alternative 2 conditions. Under Alternative 2, six intersections do not meet the LOS D standard. These intersections, highlighted in bold, are the same impacted intersections as those identified under Alternative 1. Five of the six intersections operate with LOS F conditions.

Under Alternative 2, six intersections are expected to fall below the LOS D threshold; these intersections are the same as those identified under Alternative 1. However, operations are expected to degrade with five of the six intersections falling from LOS E to F. All six intersections would experience at least five additional seconds of delay (the impact threshold) and therefore are considered to have a significant impact under Alternative 2. These include:

- N 145th Street / Aurora Avenue N
- NE 145th Street / 5th Avenue NE
- NE 145th Street / 15th Avenue NE
- N 130th Street / Aurora Avenue N
- N 130th Street / 1st Avenue NE
- NE 125th Street / 15th Avenue NE

Exhibit 3.10-51. 130th/145th Street Subarea PM Peak Hour Level of Service—Alternative 2

ID	Intersection	Alternative 1, No Action—Level of Service / Delay (seconds)	Alternative 2—Level of Service / Delay (seconds)
1	NE 155th St / 5th Ave NE	B / 19	C / 21
2	**N 145th St / Aurora Ave N**	**E / 68**	**F / 83**
3	N 145th St / Meridian Ave N	B / 18	B / 20
4	N 145th St / 1st Ave NE	B / 20	C / 25
5	NE 145th St / I-5 On & Off Ramps	A / 9	A / 9
6	**NE 145th St / 5th Ave NE**	**E / 69**	**F / 85**
7	**NE 145th St / 15th Ave NE**	**E / 66**	**F / 80**
8	N 137th St / Meridian Ave N / Roosevelt Way N	A / 7	A / 8
9	**N 130th St / Aurora Ave N**	**E / 79**	**F / 88**
10	N 130th St / Meridian Ave N	B / 13	B / 14
11	**N 130th St / 1st Ave NE**	**E / 71**	**F / 92**
12	NE 130th St / I-5 On Ramp	A / 2	A / 2
13	NE 130th St / Roosevelt Way NE / 5th Ave NE	D / 38	D / 42
14	Roosevelt Way NE / NE 125th St / 10th Ave NE	B / 17	B / 19
15	**NE 125th St / 15th Ave NE**	**E / 60**	**E / 70**

Note: Impacted intersections are shown in bold.
Source: Fehr & Peers, 2023.

State Facilities

Exhibit 3.10-52 shows a comparison of Alternative 2 forecasted volume to the maximum service volume needed to maintain the LOS standard ~~ratios for Alternative 1 and Alternative 2~~ at each of the identified state facility study locations. ~~V~~Alternative 2 volumes at all locations are expected to remain similar or increase slightly relative to Alternative 1. I-5 at the Ship Canal Bridge and north of the West Seattle Bridge, SR 99 at the Aurora Bridge, and SR 509 at the 1st Avenue Bridge are forecasted to have demand more than 20% over the maximum service volume, indicating substantial vehicle congestion for some hours of the day. The same seven study locations projected to exceed the WSDOT LOS standard under Alternative 1 would do so under Alternative 2. At four of those locations, the ratio is projected to increase by at least 0.01, constituting a significant impact under Alternative 2:

- I-5 at the Ship Canal Bridge
- SR 99 north of N Northgate Way
- SR 99 at the Aurora Avenue Bridge
- SR 522 south of NE 145th Street

The following study locations are also expected to exceed the WSDOT LOS standard, but would have volumes roughly equivalent to Alternative 1, and therefore are not considered to be significant impacts under Alternative 2:

- I-5 north of NE Northgate Way
- I-5 north of the West Seattle Bridge
- SR 509 at the 1st Avenue S Bridge

Because Alternative 2 would cause volumes to increase on multiple state facilities already expected to exceed WSDOT's LOS D standard under Alternative 1, a significant impact to state facilities is expected under Alternative 2.

Exhibit 3.10-52. ~~PM Peak Hour~~Daily State Facilities Level of Service—Alternative 2

Facility	Extents	WSDOT LOS Standard	Alternative 1, No Action—Volume to Maximum Service Volume Ratio	Alternative 2—Volume to Maximum Service Volume Ratio
I-5	North of NE Northgate Way	D	1.03	1.03
I-5	**Ship Canal Bridge**	D	~~1.32~~>1.20	**>1.20**~~1.35~~
I-5	North of West Seattle Bridge	D	>1.20~~1.32~~	>1.20~~1.32~~
I-5	North of Boeing Access Rd Ramp	D	0.98	0.98
I-90	Mt Baker Tunnel	D	0.97	0.99
SR 99	**North of N Northgate Way**	D	1.08	**1.11**
SR 99	**Aurora Ave Bridge**	D	>1.20~~1.30~~	**>1.20**~~1.35~~

Facility	Extents	WSDOT LOS Standard	Alternative 1, No Action—Volume to Maximum Service Volume Ratio	Alternative 2—Volume to Maximum Service Volume Ratio
SR 99	Tunnel	D	0.65	0.66
SR 99	North of West Seattle Bridge	D	0.76	0.77
SR 99	South of S Cloverdale St	E (mitigated)	0.41	0.42
SR 509	1st Ave S Bridge	D	>1.20~~1.25~~	~~1.25~~>1.20
SR 519	S Atlantic St West of I-90 Ramps	D	0.83	0.83
SR 520	Lake Washington Bridge	D	0.86	0.88
SR 522	**South of NE 145th St**	D	1.15	**1.18**

Note: Impacted locations are shown in bold.
A ratio of >1.2 indicates a demand of more than 20% over the maximum service volume, indicating substantial vehicle congestion for some hours of the day. The WSDOT standard is equivalent to a 1.0 (the denominator is the maximum volume at which LOS D can be maintained).
Source: Fehr & Peers, 2023.

Impacts of Alternative 3: Broad

Mode Share

Exhibit 3.10-53 summarizes the SOV mode share expected under Alternative 3. The SoundCast model predicts that Alternative 3 SOV mode shares will be very similar to Alternative 1. The only notable changes are expected in Northeast Seattle and Southeast Seattle where the SOV mode shares would increase slightly, however both subareas would still meet their SOV targets. Although the Duwamish subarea would exceed its target, the difference in mode share relative to Alternative 1 is expected to be less than the 1% impact threshold. Therefore, no mode share impact is expected under Alternative 3.

Exhibit 3.10-53. PM Peak Hour SOV Mode Share—Alternative 3

Subarea	SOV Target	Alternative 1, No Action SOV Share	Alternative 3 SOV Share
(1) Northwest Seattle	37%	34%	34%
(2) Northeast Seattle	35%	26%	27%
(3) Queen Anne/Magnolia	38%	34%	34%
(4) Downtown/Lake Union	18%	11%	11%
(5) Capitol Hill/Central District	28%	27%	27%
(6) West Seattle	35%	35%	35%
(7) Duwamish	51%	67%	67%

Subarea	SOV Target	Alternative 1, No Action SOV Share	Alternative 3 SOV Share
(8) Southeast Seattle	38%	31%	32%

Note: Existing (2017-2019) mode share data from the PSRC household travel survey have substantial margins of error. See **Exhibit 3.10-10** for margins of error by subarea.
Source: Fehr & Peers, 2023.

Exhibit 3.10-54 compares the number of daily person trips expected by mode under 2044 Alternative 1 and Alternative 3. Citywide, Alternative 3 is expected to result in approximately 138,000 additional person trips than Alternative 1, an increase of ~~3~~2%. The increase among modes varies more than was the case under Alternative 2. In particular, the number of trips by transit and biking is only expected to increase by approximately 1% while the number of trips by driving and walking would increase by 3 to 4%.

Exhibit 3.10-54. Daily Person Trips by Mode—Alternative 3

Mode	Alternative 1, No Action	Alternative 3
SOV	1,783,000	1,853,000
HOV	1,440,000	1,473,000
Transit	1,138,000	1,142,000
Walk	1,378,000	1,408,000
Bike	99,000	100,000
Total	**5,838,000**	**5,976,000**

Source: Fehr & Peers, 2023.

Transit

Exhibit 3.10-55 summarizes the projected load factors on the busiest segment of each route in the peak direction of travel. Passenger loads under Alternative 3 are generally lower than those forecasted under Alternative 2; however, the same study routes would be impacted. Study routes that would have a transit capacity impact under Alternative 3 are shown in bold in **Exhibit 3.10-55**. The impacted routes include:

- RapidRide E Line—Downtown to Aurora Village
- RapidRide J Line—Downtown to University District
- RapidRide R Line—Downtown to Rainier Valley
- RapidRide Fremont

Exhibit 3.10-55. PM Peak Hour Average Passenger Load Factors—Alternative 3

Transit Route	Maximum Passenger Load Factor in Peak Direction	
	Alternative 1, No Action	Alternative 3
Link light rail—1 Line	1.08	1.00
Link light rail—2 Line	1.29	1.25
Link light rail—3 Line	1.29	1.26
RapidRide C Line—Westwood Village to Alaska Junction	0.71	0.78
RapidRide E Line—Downtown to Aurora Village	1.89	**2.00**
RapidRide G Line—Downtown to Madison Valley	0.35	0.37
RapidRide H Line—Alki to Burien	0.77	0.87
RapidRide J Line—Downtown to University District	1.97	**2.14**
RapidRide R Line—Downtown to Rainier Valley	1.07	**1.18**
RapidRide 23rd	0.47	0.45
RapidRide 65th (replaces Route 62)	0.82	0.87
RapidRide Beacon	0.50	0.51
RapidRide Denny	2.83	2.77
RapidRide Fremont (replaces Route 40)	1.49	**1.63**
RapidRide Green Lake	0.47	0.44
RapidRide Market	0.76	0.70

Note: Impacted routes are shown in bold.
Source: Fehr & Peers, 2023.

Roadway Users

This section summarizes roadway conditions expected under Alternative 3.

VMT / VHT / Average Trip Speed

Exhibit 3.10-56 summarizes VMT, VHT and average trip speed under Alternative 3 relative to Alternative 1. As with Alternative 2, total daily VMT generated under Alternative 3 is expected to increase compared to Alternative 1; however, the increase is minimal at 1%. The VMT per capita is expected to decrease slightly from approximately 13.7 miles per day to 13.5 miles per day. This incremental difference may reflect slight changes in travel behavior in terms of mode choice and average trip lengths.

Similarly, VHT is projected to increase in total compared to Alternative 1 but would remain flat on a per capita basis at approximately a half hour of daily travel by private car or truck. The average trip speed is expected to stay essentially flat relative to Alternative 1.

Exhibit 3.10-56. Daily VMT, VHT, and Average Trip Speed—Alternative 3

	Alternative 1, No Action		Alternative 3	
Metric	Total	Per Capita	Total	Per Capita
VMT	24,357,100	13.7	24,593,100	13.5
VHT	865,800	0.5	873,000	0.5
Average Trip Speed	28.1	—	28.2	—

Source: Fehr & Peers, 2023.

Because the VMT per capita under Alternative 3 would not exceed the level under Alternative 1, no impact to VMT per capita is identified under Alternative 3.

Travel Time

Exhibit 3.10-57 summarizes PM peak hour corridor travel times under Alternative 3 compared to Alternative 1.[93] **Exhibit 3.10-58** shows the LOS values along associated corridors on the map. All corridor travel times are expected to be within 0.5 minutes of Alternative 1 with most corridors seeing slight increases. Under Alternative 1, 77 corridors (with each direction counted separately) are expected to operate at LOS A-C, 15 at LOS D, 8 operating at LOS E, and 4 operating at LOS F. Under Alternative 3, 75 corridors are expected to operate at LOS A-C, 17 at LOS D, 8 operating at LOS E, and 4 operating at LOS F.

Alternative 1 and Alternative 3 are expected to result in the same four corridors operating at LOS F, one of which would have an increase in excess of the 5% threshold of significance. Therefore, a travel time impact is expected under Alternative 3 on one corridor (shown in bold in **Exhibit 3.10-57**):

- Olive Way between 4th Avenue and Denny Way

[93] For corridors with peak directional patterns, the AM peak hour would typically reflect similar conditions in the opposite direction from those shown for the PM peak hour.

Exhibit 3.10-57. PM Peak Hour Travel Time Corridor Level of Service—Alternative 3

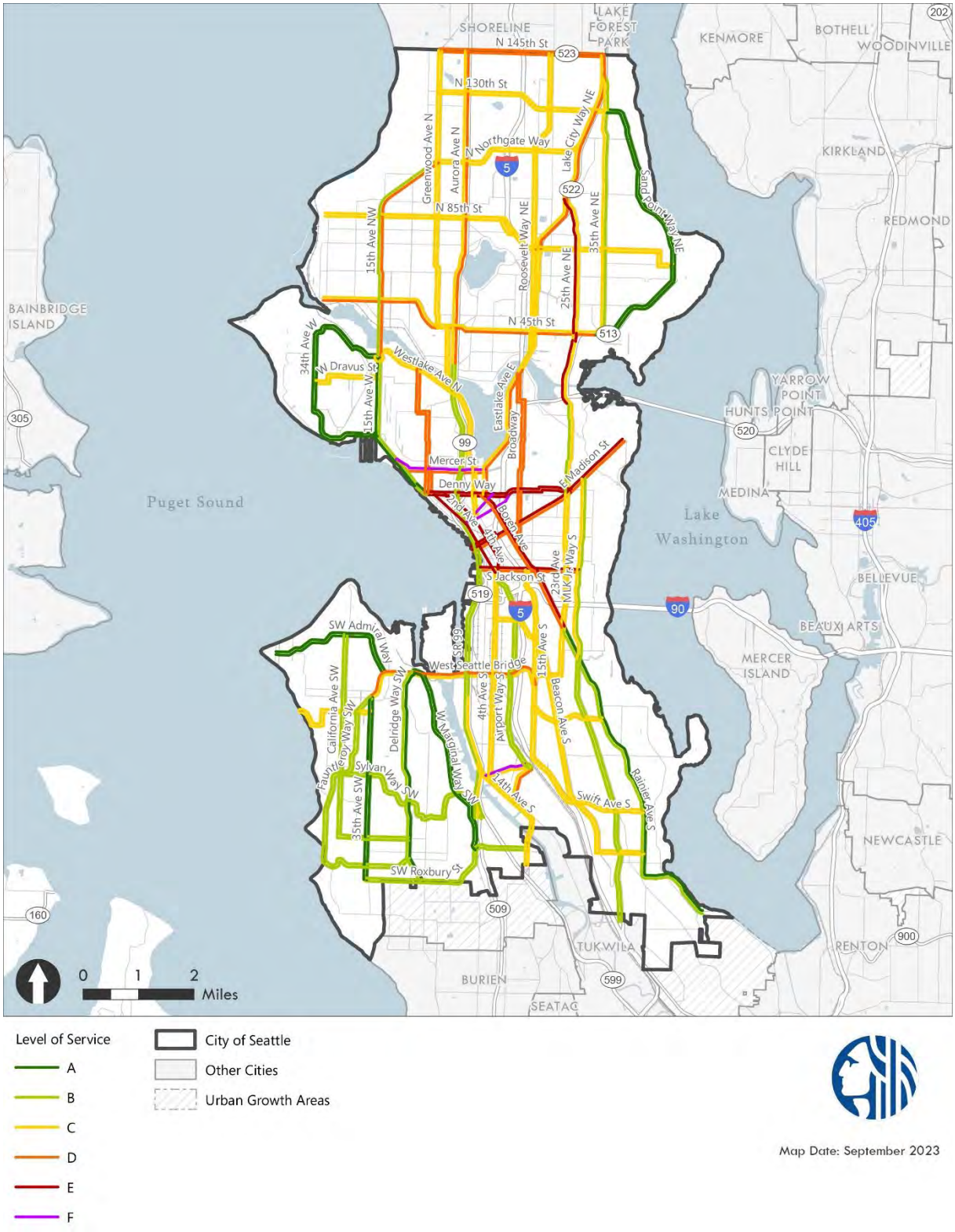
		Alternative 1, No Action, Minutes / Level of Service		Alternative 3 Minutes / Level of Service	
Roadway	Extents	N/E	S/W	N/E	S/W
N 145th St	Greenwood Ave N to Lake City Way NE	10.5 / D	9.5 / C	10.5 / D	10 / D
N 130th St	Greenwood Ave N to 35th Ave NE	11.5 / C	12 / C	12 / C	12.5 / C
N Northgate Way	Greenwood Ave N to Lake City Way NE	10.5 / C	11 / C	11 / C	11 / C
N 85th St	32nd Ave NW to Sand Point Way NE	25 / C	24.5 / C	25 / C	25 / C
N 45th St	32nd Ave NW to Union Bay Pl NE	24.5 / C	23.5 / C	25 / D	24 / C
15th Ave NW	W Emerson St to N 105th St	17 / D	11.5 / B	17.5 / D	11.5 / B
Greenwood Ave N	Nickerson St to N 145th St	27 / C	25 / C	27.5 / C	25.5 / C
Aurora Ave N	N 38th St to N 145th St	19 / D	16.5 / C	19 / D	17 / C
Roosevelt Way NE	Fuhrman Ave E to N 145th St	23 / C	21.5 / C	23 / C	22 / C
Lake City Way NE	NE 75th St to N 145th St	14 / D	11 / C	14 / D	11 / C
25th Ave NE	E Roanoke St to Lake City Way NE	15 / C	22.5 / E	15 / C	23 / E
35th Ave NE	Union Bay Pl NE to Lake City Way NE	16.5 / B	17.5 / C	16.5 / B	18 / C
Sand Point Way NE	Union Bay Pl NE to 35th Ave NE	12.5 / A	12 / A	12.5 / A	12 / A
34th Ave W	15th Ave W to15th Ave W	11.5 / A	12 / A	11.5 / A	12 / A
W Dravus St	34th Ave W to15th Ave W	5 / C	4.5 / C	5.5 / C	4.5 / C
15th Ave W	Queen Anne Ave N to W Emerson St	8.5 / B	8 / A	9 / B	8 / A
Queen Anne Ave N	Denny Way to Nickerson St	12.5 / D	12 / D	12.5 / D	12 / D
SR 99	S Nevada St to N 38th St	11.5 / B	12.5 / B	11.5 / B	12.5 / B
Westlake Ave N	Stewart St to W Emerson St	16 / C	18 / C	16.5 / C	18 / C
Eastlake Ave E	Denny Way to Fuhrman Ave E	12 / D	11.5 / C	12 / D	11.5 / C
Broadway	Boren Ave to Eastlake Ave E	18 / D	18.5 / D	18.5 / D	18.5 / D

Roadway	Extents	Alternative 1, No Action, Minutes / Level of Service		Alternative 3 Minutes / Level of Service	
		N/E	S/W	N/E	S/W
23rd Ave	E Madison St to E Roanoke St	6 / C	5 / B	6 / C	5 / B
Mercer St	Elliott Ave W to Fairview Ave N	8 / D	14 / F	8 / D	14 / F
Denny Way	Queen Anne Ave N to E Madison St	17.5 / E	16.5 / E	17.5 / E	16.5 / E
2nd Ave	4th Ave S to Denny Way	- / -	12 / E	- / -	12 / E
4th Ave	S Jackson St to Denny Way	10 / E	- / -	10 / E	- / -
Stewart St	1st Ave to Denny Way	- / -	6.5 / F	- / -	6.5 / F
Olive Way	**4th Ave to Denny Way**	7 / F	- / -	**7.5 / F**	- / -
E Madison St	Alaskan Way S to McGilvra Blvd E	20 / D	20 / E	20.5 / D	20 / E
Boren Ave	23rd Ave S to Denny Way	18 / E	15.5 / D	18 / E	15.5 / D
S Jackson St	Alaskan Way S to MLK Jr. Way S	8.5 / D	11 / E	9 / D	11 / E
23rd Ave	15th Ave S to E Madison St	16.5 / C	17.5 / C	16.5 / C	17.5 / C
MLK Jr. Way S	Rainier Ave S to E Madison St	11.5 / B	12 / C	11.5 / B	12 / C
4th Ave S	E Marginal Way S to S Jackson St	13.5 / C	11.5 / C	13.5 / C	11.5 / C
Airport Way S	S Albro Pl to 4th Ave S	10.5 / B	10 / B	10.5 / B	10 / B
15th Ave S	S Jackson St to Rainier Ave S	15 / C	16.5 / C	15.5 / C	17 / C
E Marginal Way S	S Holden St to S Nevada St	5.5 / C	5 / B	5 / C	5 / B
Swift Ave S	Rainier Ave S to S Columbian Way	14 / C	14 / C	14.5 / C	14.5 / C
Beacon Ave S	Rainier Ave S to 4th Ave S	22 / C	24.5 / C	22.5 / C	25 / C
MLK Jr. Way S	S Boeing Access Rd to Rainier Ave S	16.5 / B	16.5 / B	16.5 / B	16.5 / B
Rainier Ave S	Cornell Ave S to 23rd Ave S	18.5 / A	20.5 / B	18.5 / A	20.5 / B
S Michigan St	E Marginal Way S to Airport Way S	3.5 / C	4.5 / F	3.5 / C	4.5 / F
Ellis Ave S	E Marginal Way S to Airport Way S	3 / D	3.5 / C	3 / D	3.5 / C

Roadway	Extents	Alternative 1, No Action, Minutes / Level of Service		Alternative 3 Minutes / Level of Service	
		N/E	S/W	N/E	S/W
14th Ave S	S Director St to 1st Ave S	7.5 / C	7 / C	7.5 / C	7 / C
California Ave SW/SW Thistle St	Delridge Way SW to SW Admiral Way	17 / B	17.5 / B	17.5 / B	17.5 / B
Fauntleroy Way SW/SW Barton St	Delridge Way SW to 35th Ave SW	15.5 / B	18 / C	15.5 / B	17.5 / B
35th Ave SW	SW Roxbury St to Fauntleroy Way SW	8.5 / A	9 / A	8.5 / A	9 / A
Delridge Way SW	SW Roxbury St to W Marginal Way SW	11.5 / A	13.5 / B	11.5 / A	13.5 / B
W Marginal Way SW	S Cloverdale St to Delridge Way SW	7.5 / A	8.5 / A	8 / A	8.5 / A
SW Admiral Way	63rd Ave SW to SW Manning St	6.5 / A	7 / A	6.5 / A	7 / A
West Seattle Bridge	35th Ave SW to 15th Ave S	8.5 / C	10 / D	8.5 / C	10.5 / D
SW Alaska St	Beach Dr SW to 35th Ave SW	7 / C	7.5 / C	7 / C	7.5 / C
Sylvan Way SW	California Ave SW to S Holden St	12 / B	11 / B	12 / B	11 / B
SW Roxbury St	35th Ave SW to 14th Ave S	11.5 / B	10.5 / B	11.5 / B	11 / B

Note: Impacted corridors are shown in bold.
Source: Fehr & Peers, 2023.

Exhibit 3.10-58. Alternative 3 Travel Time Corridor LOS



Source: Fehr & Peers, 2023.

Screenlines

Exhibit 3.10-59 summarizes PM peak hour screenline V/C ratios for 2044 Alternative 1 and 2044 Alternative 3. The volume forecasts in Alternative 3 are approximately ~~five~~ four percent higher than the Alternative 1 forecasts across all locations (similar to Alternative 2). Under Alternative 3, seven screenlines are expected to operate with V/C ratios higher than 0.90, compared with six in Alternative 1. The screenlines are:

- Ship Canal—Ballard Bridge
- Ship Canal—Fremont Bridge
- Ship Canal—Aurora Ave N
- Duwamish River—1st Ave S and 16th Ave S
- Ship Canal—University and Montlake Bridges
- East of 9th Avenue
- South City Limit—Martin Luther King Jr Wy to Rainier Ave S (Alternative 3 only)

While Alternative 3 would cause V/C ratios to increase across many screenlines, none are expected to exceed the established thresholds. Therefore, no significant impacts to screenlines are expected under Alternative 3.

Exhibit 3.10-59. Screenline Volume-to-Capacity Ratio—Alternative 3

Screenline	Location	Extents	V/C Threshold	Alternative 1, No Action		Alternative 3	
				N/E	S/W	N/E	S/W
1.11	North City Limit	3rd Ave NW to Aurora Ave N	1.20	0.75	0.65	0.74	0.71
1.12	North City Limit	Meridian Ave N to 15th Ave NE	1.20	0.48	0.39	0.45	0.42
1.13	North City Limit	30th Ave NE to Lake City Way NE	1.20	0.85	0.62	0.83	0.66
2.00	Magnolia	Magnolia Bridge to W Emerson Place	1.00	0.58	0.61	0.62	0.65
3.11	Duwamish River	West Seattle Bridge & Spokane St	1.20	0.72	0.81	0.74	0.85
3.12	Duwamish River	1st Ave S & 16th Ave S	1.20	0.69	0.91	0.70	0.93
4.11	South City Limit	Martin Luther King Jr. Way to Rainier Ave S	1.00	0.83	0.87	0.86	0.92
4.12	South City Limit	Marine Dr SW to Meyers Way S	1.00	0.44	0.49	0.46	0.50
4.13	South City Limit	SR 99 to Airport Way S	1.00	0.63	0.47	0.63	0.47
5.11	Ship Canal	Ballard Bridge	1.20	1.01	0.90	1.06	0.93
5.12	Ship Canal	Fremont Bridge	1.20	1.00	1.03	1.11	1.11
5.13	Ship Canal	Aurora Ave Bridge	1.20	0.96	0.70	0.99	0.72
5.16	Ship Canal	University & Montlake Bridges	1.20	0.74	0.94	0.79	0.99
6.11	South of NW 80th St	Seaview Ave NW to 15th Ave NW	1.00	0.40	0.52	0.43	0.56
6.12	South of N W 80th St	8th Ave NW to Greenwood Ave N	1.00	0.60	0.62	0.63	0.64
6.13	South of NE 80th St	Linden Ave N to 1st Ave NE	1.00	0.51	0.59	0.53	0.62
6.14	South of NE 80th St	5th Ave NE to 15th Ave NE	1.00	0.65	0.69	0.72	0.75
6.15	South of NE 80th St	20th Ave NE to Sand Point Way NE	1.00	0.41	0.39	0.45	0.42
7.11	West of Aurora Ave	Fremont Pl N to N 65th St	1.00	0.64	0.63	0.67	0.65
7.12	West of Aurora Ave	N 80th St to N 145th St	1.00	0.44	0.45	0.47	0.49
8.00	South of Lake Union	Valley St to Denny Way	1.20	0.50	0.35	0.52	0.37

Screenline	Location	Extents	V/C Threshold	Alternative 1, No Action		Alternative 3	
				N/E	S/W	N/E	S/W
9.11	South of Spokane St	Beach Dr SW to W Marginal Way SW	1.00	0.51	0.82	0.53	0.86
9.12	South of Spokane St	E Marginal Way S to Airport Way S	1.00	0.65	0.52	0.65	0.53
9.13	South of Spokane St	15th Ave S to Rainier Ave S	1.00	0.69	0.60	0.70	0.63
10.11	South of S Jackson St	Alaskan Way S to 4th Ave S	1.00	0.81	0.82	0.82	0.84
10.12	South of S Jackson St	12th Ave S to Lakeside Ave S	1.00	0.74	0.74	0.77	0.75
12.12	East of CBD	S Jackson St to Howell St	1.20	0.37	0.44	0.38	0.44
13.11	East of I-5	NE Northgate Way to NE 145th St	1.00	0.70	0.53	0.75	0.55
13.12	East of I-5	NE 65th St to NE 80th St	1.00	0.54	0.50	0.59	0.55
13.3	East of I-5	NE Pacific St to NE Ravenna Blvd	1.00	0.61	0.56	0.66	0.60
A1	North of Seneca St	1st Ave to 6th Ave	N/A	0.63	0.65	0.64	0.65
A2	North of Blanchard	Elliott Ave to Westlake Ave	N/A	0.45	0.37	0.45	0.38
A3	East of 9th Ave	Lenora St to Pike St	N/A	0.46	0.94	0.46	0.93
A4	South of Mercer St	Elliott Ave W to Aurora Ave N	N/A	0.55	0.59	0.57	0.62
A5	East of 5th Ave N	Denny Way to Valley St	N/A	0.41	0.37	0.42	0.40
A6	North of Pine St	Melrose Ave E to 15th Ave E	N/A	0.41	0.42	0.43	0.42
A7	North of James St– E Cherry St	Boren Ave to 14th Ave	N/A	0.56	0.39	0.57	0.40
A8	West of Broadway	Yesler Way to E Roy St	N/A	0.55	0.46	0.57	0.46
A9	South of NE 45th St	7th Ave NE to Montlake Blvd NE	N/A	0.54	0.60	0.57	0.63
A10	East of 15th Ave NE	NE 45th St to NE 52nd St	N/A	0.58	0.53	0.62	0.56
A11	South of Northgate Way (N/NE 110th St)	N Northgate Way to Roosevelt Way NE	N/A	0.46	0.54	0.49	0.57
A12	East of 1st Ave NE	NE 100th St to NE Northgate Way	N/A	0.44	0.51	0.46	0.53

Source: Fehr & Peers, 2023.

Intersection LOS—NE 130th / NE 145th Street Subarea

Under Alternative 3, Sound Transit would provide transit investments but the 130th / NE 145th Street Station Area Plan would not be implemented and the area would grow with citywide place types.

Exhibit 3.10-60 summarizes the LOS and vehicle delay for each study intersection under Alternative 3. The same six intersections that are identified as impacts under Alternative 1 and Alternative 2 would also be impacted under Alternative 3. Delays under Alternative 3 would be longer than under Alternative 2. These impacted intersections, all of which are expected to operate at LOS F, include:

- N 145th Street / Aurora Avenue N
- NE 145th Street / 5th Avenue NE
- NE 145th Street / 15th Avenue NE
- N 130th Street / Aurora Avenue N
- N 130th Street / 1st Avenue NE
- NE 125th Street / 15th Avenue NE

Exhibit 3.10-60. 130th/145th Street Subarea PM Peak Hour Level of Service—Alternative 3

ID	Intersection	Alternative 1, No Action—Level of Service / Delay (seconds)	Alternative 3—Level of Service / Delay (seconds)
1	NE 155th St / 5th Ave NE	B / 19	C / 21
2	**N 145th St / Aurora Ave N**	**E / 68**	**F / 86**
3	N 145th St / Meridian Ave N	B / 18	B / 20
4	N 145th St / 1st Ave NE	B / 20	C / 25
5	NE 145th St / I-5 On & Off Ramps	A / 9	A / 9
6	**NE 145th St / 5th Ave NE**	**E / 69**	**F / 92**
7	**NE 145th St / 15th Ave NE**	**E / 66**	**F / 81**
8	N 137th St / Meridian Ave N / Roosevelt Way N	A / 7	A / 8
9	**N 130th St / Aurora Ave N**	**E / 79**	**F / 96**
10	N 130th St / Meridian Ave N	B / 13	B / 19
11	**N 130th St / 1st Ave NE**	**E / 71**	**F / 107**
12	NE 130th St / I-5 On Ramp	A / 2	A / 2
13	NE 130th St / Roosevelt Way NE / 5th Ave NE	D / 38	D / 47
14	Roosevelt Way NE / NE 125th St / 10th Ave NE	B / 17	B / 19
15	**NE 125th St / 15th Ave NE**	**E / 60**	**F / 81**

Note: Impacted intersections are shown in bold.
Source: Fehr & Peers, 2023.

State Facilities

Exhibit 3.10-61 compares Alternative 3 forecasted volume to the maximum service volume needed to maintain the LOS standard ~~ratios for Alternative 1 and Alternative 3~~ at each of the state facility study locations. ~~V~~Alternative 3 volumes at all locations are expected to remain similar or increase slightly relative to Alternative 1. I-5 at the Ship Canal Bridge and north of the West Seattle Bridge, SR 99 at the Aurora Bridge, and SR 509 at the 1st Avenue Bridge are forecasted to have demand more than 20% over the maximum service volume, indicating substantial vehicle congestion for some hours of the day. The same seven study locations are projected to exceed the WSDOT LOS standard under Alternative 1 would do so under Alternative 3. At four of those locations, the ratio is projected to increase by at least 0.01, constituting a significant impact under Alternative 3:

- I-5 at the Ship Canal Bridge
- SR 99 north of N Northgate Way
- SR 99 at the Aurora Avenue Bridge
- SR 522 south of NE 145th Street

The following study locations are also expected to exceed the WSDOT LOS standard, but would have volumes roughly equivalent to Alternative 1, and therefore are not considered to be significant impacts under Alternative 3:

- I-5 north of NE Northgate Way
- I-5 north of the West Seattle Bridge
- SR 509 at the 1st Avenue S Bridge

Because Alternative 3 would cause volumes to increase on multiple state facilities already expected to exceed WSDOT's LOS D standard under Alternative 1, a significant impact to state facilities is expected under Alternative 3.

Exhibit 3.10-61. Daily State Facilities Level of Service—Alternative 3

Facility	Extents	WSDOT LOS Standard	Alternative 1, No Action—Volume to Maximum Service Volume Ratio	Alternative 3—Volume to Maximum Service Volume Ratio
I-5	North of NE Northgate Way	D	1.03	1.03
I-5	**Ship Canal Bridge**	D	~~1.32~~>1.20	**>1.20**~~1.35~~
I-5	North of West Seattle Bridge	D	>1.20~~1.32~~	>1.20~~1.32~~
I-5	North of Boeing Access Rd Ramp	D	0.98	0.98
I-90	Mt Baker Tunnel	D	0.97	0.99
SR 99	**North of N Northgate Way**	D	1.08	**1.14**
SR 99	**Aurora Ave Bridge**	D	>1.20~~1.30~~	**>1.20**~~1.35~~
SR 99	Tunnel	D	0.65	0.68

Facility	Extents	WSDOT LOS Standard	Alternative 1, No Action—Volume to Maximum Service Volume Ratio	Alternative 3—Volume to Maximum Service Volume Ratio
SR 99	North of West Seattle Bridge	D	0.76	0.77
SR 99	South of S Cloverdale St	E (mitigated)	0.41	0.42
SR 509	1st Ave S Bridge	D	>1.20~~1.25~~	>1.20~~1.25~~
SR 519	S Atlantic St West of I-90 Ramps	D	0.83	0.83
SR 520	Lake Washington Bridge	D	0.86	0.87
SR 522	**South of NE 145th St**	D	1.15	**1.18**

Note: Impacted routes are shown in bold.
A ratio of >1.2 indicates a demand of more than 20% over the maximum service volume, indicating substantial vehicle congestion for some hours of the day. The WSDOT standard is equivalent to a 1.0 (the denominator is the maximum volume at which LOS D can be maintained).
Source: Fehr & Peers, 2023.

Impacts of Alternative 5: Combined

Mode Share

Exhibit 3.10-62 summarizes the SOV mode share expected under Alternative 5. The SoundCast model predicts that Alternative 5 SOV mode shares will be essentially the same as Alternative 1. Although the Duwamish subarea would exceed its target, the difference in mode share relative to Alternative 1 is expected to be less than the 1% impact threshold. Therefore, no mode share impact is expected under Alternative 5.

Exhibit 3.10-62. PM Peak Hour SOV Mode Share—Alternative 5

Subarea	SOV Target	Alternative 1, No Action SOV Share	Alternative 5 SOV Share
(1) Northwest Seattle	37%	34%	34%
(2) Northeast Seattle	35%	26%	26%
(3) Queen Anne/Magnolia	38%	34%	34%
(4) Downtown/Lake Union	18%	11%	11%
(5) Capitol Hill/Central District	28%	27%	27%
(6) West Seattle	35%	35%	35%
(7) Duwamish	51%	67%	67%
(8) Southeast Seattle	38%	31%	31%

Note: Existing (2017-2019) mode share data from the PSRC household travel survey have substantial margins of error. See **Exhibit 3.10-10** for margins of error by subarea.
Source: Fehr & Peers, 2023.

Exhibit 3.10-63 compares the number of daily person trips expected by mode under 2044 Alternative 1 and Alternative 5. Citywide, Alternative 5 is expected to result in approximately 343,000 additional person trips compared to Alternative 1, an increase of ~~8~~6%. This is the highest growth among the action alternatives as Alternative 5 assumes the highest growth in residential and employment growth. The increase is spread fairly evenly across modes. In other words, while Alternative 5 would result in more trips, the underlying travel behavior and mode shares expected are very similar between the alternatives.

Exhibit 3.10-63. Daily Person Trips by Mode—Alternative 5

Mode	Alternative 1, No Action	Alternative 5
SOV	1,783,000	1,908,000
HOV	1,440,000	1,537,000
Transit	1,138,000	1,178,000
Walk	1,378,000	1,453,000
Bike	99,000	105,000
Total	**5,838,000**	**6,181,000**

Source: Fehr & Peers, 2023.~~Transit~~

Transit

Exhibit 3.10-64 summarizes the projected load factors on the busiest segment of each route in the peak direction of travel with impacts shown in bold. As with Alternatives 2 and 3, the following study routes would be impacted under Alternative 5:

- RapidRide E Line—Downtown to Aurora Village
- RapidRide J Line—Downtown to University District
- RapidRide R Line—Downtown to Rainier Valley
- RapidRide Fremont

Exhibit 3.10-64. PM Peak Hour Average Passenger Load Factors—Alternative 5

	Maximum Passenger Load Factor in Peak Direction	
Transit Route	Alternative 1, No Action	Alternative 5
Link light rail—1 Line	1.08	1.06
Link light rail—2 Line	1.29	1.32
Link light rail—3 Line	1.29	1.21
RapidRide C Line—Westwood Village to Alaska Junction	0.71	0.90
RapidRide E Line—Downtown to Aurora Village	1.89	**2.01**
RapidRide G Line—Downtown to Madison Valley	0.35	0.39

Transit Route	Maximum Passenger Load Factor in Peak Direction	
	Alternative 1, No Action	Alternative 5
RapidRide H Line—Alki to Burien	0.77	0.84
RapidRide J Line—Downtown to University District	1.97	**2.66**
RapidRide R Line—Downtown to Rainier Valley	1.07	**1.19**
RapidRide 23rd	0.47	0.48
RapidRide 65th (replaces Route 62)	0.82	0.97
RapidRide Beacon	0.50	0.59
RapidRide Denny	2.83	2.53
RapidRide Fremont (replaces Route 40)	1.49	**1.66**
RapidRide Green Lake	0.47	0.41
RapidRide Market	0.76	0.78

Note: Impacted routes are shown in bold.
Source: Fehr & Peers, 2023.

Roadway Users

Alternative 5 assumes the most extensive changes to Seattle's land use patterns. Accordingly, Alternative 5 is projected to have the highest increase in vehicle volumes, compared to Alternative 1. Results are summarized in the following sections.

VMT / VHT / Average Trip Speed

Exhibit 3.10-65 summarizes VMT, VHT and average trip speed under Alternative 5 relative to Alternative 1. Among the action alternatives, Alternative 5 would result in the highest total VMT (3.1% over No Action) and VHT (4.6% over No Action) because it assumes a higher level of growth. Consequently, it also assumes the lowest average trip speed at just under 28 mph. However, despite the increase in VMT, the VMT per capita would be the lowest among the action alternatives at 13.4 VMT per Seattle resident and employee. The VHT per capita under Alternative 5 would essentially flat relative to the other 2044 alternatives.

Exhibit 3.10-65. Daily VMT, VHT, and Average Trip Speed—Alternative 5

Metric	Alternative 1, No Action		Alternative 5	
	Total	Per Capita	Total	Per Capita
VMT	24,357,100	13.7	25,122,100	13.4
VHT	865,800	0.5	905,700	0.5
Average Trip Speed	28.1	—	27.7	—

Source: Fehr & Peers, 2023.

Because the VMT per capita under Alternative 5 would not exceed the level under Alternative 1, no impact to VMT per capita is identified under Alternative 5.

Travel Time

Exhibit 3.10-66 summarizes PM peak hour corridor travel times under Alternative 5 compared to Alternative 1.[94] **Exhibit 3.10-67** displays the LOS values along associated corridors on the map. Because Alternative 5 includes higher citywide growth levels than the other action alternatives, it is expected to result in higher travel time increases as well. Corridor travel times are expected to increase by up to one minute compared to Alternative 1 and no corridors are expected to see decreases. Under Alternative 1, 77 corridors (with each direction counted separately) are expected to operate at LOS A-C, 15 at LOS D, 8 operating at LOS E, and 4 operating at LOS F. Under Alternative 5, 72 corridors are expected to operate at LOS A-C, 20 at LOS D, 8 operating at LOS E, and 4 operating at LOS F.

Alternative 1 and Alternative 5 are expected to result in the same four corridors operating at LOS F, one of which would have an increase in excess of the 5% threshold of significance. Therefore, a travel time impact is expected under Alternative 5 on one corridor (shown in bold in **Exhibit 3.10-66**):

- Olive Way between 4th Avenue and Denny Way

[94] For corridors with peak directional patterns, the AM peak hour would typically reflect similar conditions in the opposite direction from those shown for the PM peak hour.

Exhibit 3.10-66 PM Peak Hour Travel Time Corridor Level of Service—Alternative 5

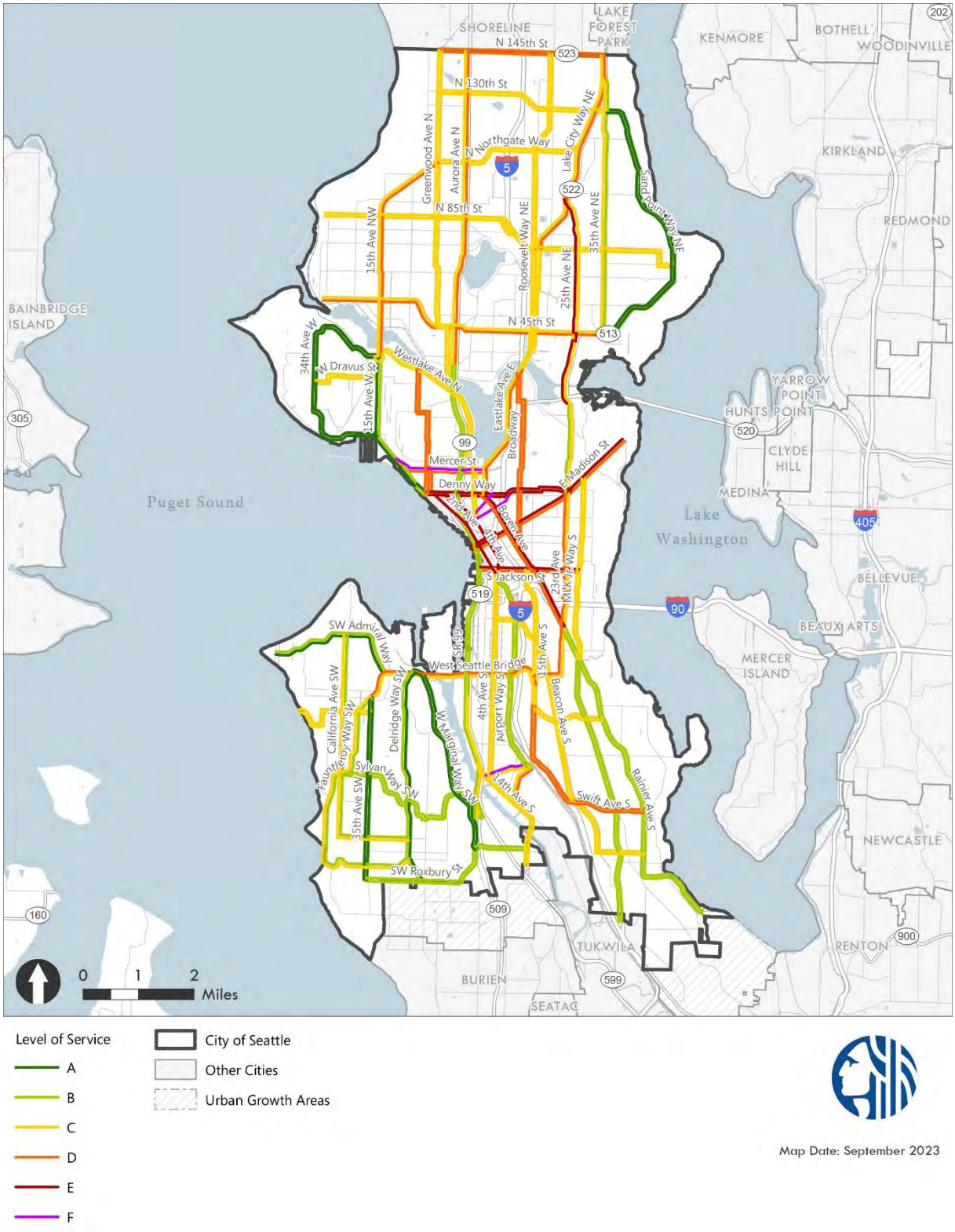
		Alternative 1, No Action Minutes / Level of Service		Alternative 5 Minutes / Level of Service	
Roadway	Extents	N/E	S/W	N/E	S/W
N 145th St	Greenwood Ave N to Lake City Way NE	10.5 / D	9.5 / C	10.5 / D	10 / D
N 130th St	Greenwood Ave N to 35th Ave NE	11.5 / C	12 / C	12 / C	12.5 / C
N Northgate Way	Greenwood Ave N to Lake City Way NE	10.5 / C	11 / C	11 / C	11 / C
N 85th St	32nd Ave NW to Sand Point Way NE	25 / C	24.5 / C	25 / C	25 / C
N 45th St	32nd Ave NW to Union Bay Pl NE	24.5 / C	23.5 / C	25 / D	24.5 / C
15th Ave NW	W Emerson St to N 105th St	17 / D	11.5 / B	17.5 / D	12 / C
Greenwood Ave N	Nickerson St to N 145th St	27 / C	25 / C	27.5 / C	26 / C
Aurora Ave N	N 38th St to N 145th St	19 / D	16.5 / C	19 / D	17 / C
Roosevelt Way NE	Fuhrman Ave E to N 145th St	23 / C	21.5 / C	23 / C	22.5 / C
Lake City Way NE	NE 75th St to N 145th St	14 / D	11 / C	14 / D	11 / C
25th Ave NE	E Roanoke St to Lake City Way NE	15 / C	22.5 / E	15.5 / C	23.5 / E
35th Ave NE	Union Bay Pl NE to Lake City Way NE	16.5 / B	17.5 / C	16.5 / B	18.5 / C
Sand Point Way NE	Union Bay Pl NE to 35th Ave NE	12.5 / A	12 / A	12.5 / A	12.5 / A
34th Ave W	15th Ave W to15th Ave W	11.5 / A	12 / A	11.5 / A	12 / A
W Dravus St	34th Ave W to15th Ave W	5 / C	4.5 / C	5 / C	4.5 / C
15th Ave W	Queen Anne Ave N to W Emerson St	8.5 / B	8 / A	9 / B	8 / A
Queen Anne Ave N	Denny Way to Nickerson St	12.5 / D	12 / D	12.5 / D	12.5 / D
SR 99	S Nevada St to N 38th St	11.5 / B	12.5 / B	12 / B	12.5 / B
Westlake Ave N	Stewart St to W Emerson St	16 / C	18 / C	16.5 / C	18.5 / C
Eastlake Ave E	Denny Way to Fuhrman Ave E	12 / D	11.5 / C	12 / D	11.5 / C
Broadway	Boren Ave to Eastlake Ave E	18 / D	18.5 / D	19 / D	19 / D

Roadway	Extents	Alternative 1, No Action Minutes / Level of Service		Alternative 5 Minutes / Level of Service	
		N/E	S/W	N/E	S/W
23rd Ave	E Madison St to E Roanoke St	6 / C	5 / B	6 / C	5.5 / B
Mercer St	Elliott Ave W to Fairview Ave N	8 / D	14 / F	8 / D	14 / F
Denny Way	Queen Anne Ave N to E Madison St	17.5 / E	16.5 / E	17.5 / E	16.5 / E
2nd Ave	4th Ave S to Denny Way	- / -	12 / E	- / -	12 / E
4th Ave	S Jackson St to Denny Way	10 / E	- / -	10 / E	- / -
Stewart St	1st Ave to Denny Way	- / -	6.5 / F	- / -	6.5 / F
Olive Way	**4th Ave to Denny Way**	7 / F	- / -	**7.5 / F**	- / -
E Madison St	Alaskan Way S to McGilvra Blvd E	20 / D	20 / E	21 / D	20.5 / E
Boren Ave	23rd Ave S to Denny Way	18 / E	15.5 / D	18.5 / E	16 / D
S Jackson St	Alaskan Way S to MLK Jr. Way S	8.5 / D	11 / E	9 / D	11 / E
23rd Ave	15th Ave S to E Madison St	16.5 / C	17.5 / C	17 / C	18 / D
MLK Jr. Way S	Rainier Ave S to E Madison St	11.5 / B	12 / C	12 / C	12 / C
4th Ave S	E Marginal Way S to S Jackson St	13.5 / C	11.5 / C	13.5 / C	11.5 / C
Airport Way S	S Albro Pl to 4th Ave S	10.5 / B	10 / B	10.5 / B	10 / B
15th Ave S	S Jackson St to Rainier Ave S	15 / C	16.5 / C	15.5 / C	17 / C
E Marginal Way S	S Holden St to S Nevada St	5.5 / C	5 / B	5.5 / C	5 / B
Swift Ave S	Rainier Ave S to S Columbian Way	14 / C	14 / C	15 / D	15 / D
Beacon Ave S	Rainier Ave S to 4th Ave S	22 / C	24.5 / C	22.5 / C	25.5 / C
MLK Jr. Way S	S Boeing Access Rd to Rainier Ave S	16.5 / B	16.5 / B	17 / B	16.5 / B
Rainier Ave S	Cornell Ave S to 23rd Ave S	18.5 / A	20.5 / B	19 / B	21 / B
S Michigan St	E Marginal Way S to Airport Way S	3.5 / C	4.5 / F	3.5 / C	4.5 / F
Ellis Ave S	E Marginal Way S to Airport Way S	3 / D	3.5 / C	3 / D	3.5 / C

Roadway	Extents	Alternative 1, No Action Minutes / Level of Service		Alternative 5 Minutes / Level of Service	
		N/E	S/W	N/E	S/W
14th Ave S	S Director St to 1st Ave S	7.5 / C	7 / C	7.5 / C	7 / C
California Ave SW/SW Thistle St	Delridge Way SW to SW Admiral Way	17 / B	17.5 / B	17.5 / B	18 / C
Fauntleroy Way SW/SW Barton St	Delridge Way SW to 35th Ave SW	15.5 / B	18 / C	16 / B	18 / C
35th Ave SW	SW Roxbury St to Fauntleroy Way SW	8.5 / A	9 / A	9 / A	9.5 / A
Delridge Way SW	SW Roxbury St to W Marginal Way SW	11.5 / A	13.5 / B	11.5 / A	13.5 / B
W Marginal Way SW	S Cloverdale St to Delridge Way SW	7.5 / A	8.5 / A	8 / A	8.5 / A
SW Admiral Way	63rd Ave SW to SW Manning St	6.5 / A	7 / A	6.5 / A	7.5 / B
West Seattle Bridge	35th Ave SW to 15th Ave S	8.5 / C	10 / D	9 / C	11 / D
SW Alaska St	Beach Dr SW to 35th Ave SW	7 / C	7.5 / C	7 / C	7.5 / C
Sylvan Way SW	California Ave SW to S Holden St	12 / B	11 / B	12 / B	11.5 / B
SW Roxbury St	35th Ave SW to 14th Ave S	11.5 / B	10.5 / B	11.5 / B	11.5 / B

Note: Impacted corridors are shown in bold.
Source: Fehr & Peers, 2023.

Exhibit 3.10-67. Alternative 5 PM Peak Hour Travel Time Corridor LOS



Source: Fehr & Peers, 2023.

Screenlines

Exhibit 3.10-68 summarizes PM peak hour screenline V/C ratios for 2044 Alternative 1 and 2044 Alternative 5. The volume forecasts in Alternative 5 are approximately seven percent higher than the Alternative 1 forecasts across all locations. Among the action alternatives, overall volumes would be highest under Alternative 5. There are seven screenlines with V/C ratios higher than 0.90, compared with six in Alternative 1. The screenlines are:

- Ship Canal—Ballard Bridge
- Ship Canal—Fremont Bridge
- Ship Canal—Aurora Ave N
- Duwamish River—1st Ave S and 16th Ave S
- Ship Canal—University and Montlake Bridges
- East of 9th Avenue
- South City Limit—M L King Jr Wy to Rainier Ave S (Alternative 5 only)

While Alternative 5 would cause V/C ratios to increase across many screenlines, none are expected to exceed the established thresholds. Therefore, no significant impacts to screenlines are expected under Alternative 5.

Exhibit 3.10-68. PM Peak Hour Screenline Volume-to-Capacity Ratio—Alternative 5

Screenline	Location	Extents	V/C Threshold	Alternative 1, No Action		Alternative 5	
				N/E	S/W	N/E	S/W
1.11	North City Limit	3rd Ave NW to Aurora Ave N	1.20	0.75	0.65	0.75	0.72
1.12	North City Limit	Meridian Ave N to 15th Ave NE	1.20	0.48	0.39	0.46	0.47
1.13	North City Limit	30th Ave NE to Lake City Way NE	1.20	0.85	0.62	0.83	0.67
2.00	Magnolia	Magnolia Bridge to W Emerson Place	1.00	0.58	0.61	0.61	0.68
3.11	Duwamish River	West Seattle Bridge & Spokane St	1.20	0.72	0.81	0.74	0.88
3.12	Duwamish River	1st Ave S & 16th Ave S	1.20	0.69	0.91	0.71	0.96
4.11	South City Limit	Martin Luther King Jr. Way to Rainier Ave S	1.00	0.83	0.87	0.92	0.92
4.12	South City Limit	Marine Dr SW to Meyers Way S	1.00	0.44	0.49	0.49	0.51
4.13	South City Limit	SR 99 to Airport Way S	1.00	0.63	0.47	0.68	0.47
5.11	Ship Canal	Ballard Bridge	1.20	1.01	0.90	1.07	0.96
5.12	Ship Canal	Fremont Bridge	1.20	1.00	1.03	1.12	1.13
5.13	Ship Canal	Aurora Ave Bridge	1.20	0.96	0.70	1.01	0.74
5.16	Ship Canal	University & Montlake Bridges	1.20	0.74	0.94	0.82	1.03
6.11	South of NW 80th St	Seaview Ave NW to 15th Ave NW	1.00	0.40	0.52	0.42	0.54
6.12	South of N W 80th St	8th Ave NW to Greenwood Ave N	1.00	0.60	0.62	0.62	0.66
6.13	South of NE 80th St	Linden Ave N to 1st Ave NE	1.00	0.51	0.59	0.53	0.62
6.14	South of NE 80th St	5th Ave NE to 15th Ave NE	1.00	0.65	0.69	0.73	0.76
6.15	South of NE 80th St	20th Ave NE to Sand Point Way NE	1.00	0.41	0.39	0.47	0.45
7.11	West of Aurora Ave	Fremont Pl N to N 65th St	1.00	0.64	0.63	0.68	0.68
7.12	West of Aurora Ave	N 80th St to N 145th St	1.00	0.44	0.45	0.48	0.50
8.00	South of Lake Union	Valley St to Denny Way	1.20	0.50	0.35	0.53	0.39

Screenline	Location	Extents	V/C Threshold	Alternative 1, No Action		Alternative 5	
				N/E	S/W	N/E	S/W
9.11	South of Spokane St	Beach Dr SW to W Marginal Way SW	1.00	0.51	0.82	0.54	0.88
9.12	South of Spokane St	E Marginal Way S to Airport Way S	1.00	0.65	0.52	0.67	0.54
9.13	South of Spokane St	15th Ave S to Rainier Ave S	1.00	0.69	0.60	0.73	0.67
10.11	South of S Jackson St	Alaskan Way S to 4th Ave S	1.00	0.81	0.82	0.86	0.87
10.12	South of S Jackson St	12th Ave S to Lakeside Ave S	1.00	0.74	0.74	0.81	0.79
12.12	East of CBD	S Jackson St to Howell St	1.20	0.37	0.44	0.39	0.45
13.11	East of I-5	NE Northgate Way to NE 145th St	1.00	0.70	0.53	0.76	0.55
13.12	East of I-5	NE 65th St to NE 80th St	1.00	0.54	0.50	0.61	0.57
13.3	East of I-5	NE Pacific St to NE Ravenna Blvd	1.00	0.61	0.56	0.69	0.60
A1	North of Seneca St	1st Ave to 6th Ave	N/A	0.63	0.65	0.67	0.68
A2	North of Blanchard	Elliott Ave to Westlake Ave	N/A	0.45	0.37	0.48	0.39
A3	East of 9th Ave	Lenora St to Pike St	N/A	0.46	0.94	0.46	0.95
A4	South of Mercer St	Elliott Ave W to Aurora Ave N	N/A	0.55	0.59	0.59	0.62
A5	East of 5th Ave N	Denny Way to Valley St	N/A	0.41	0.37	0.42	0.41
A6	North of Pine St	Melrose Ave E to 15th Ave E	N/A	0.41	0.42	0.43	0.44
A7	North of James St– E Cherry St	Boren Ave to 14th Ave	N/A	0.56	0.39	0.58	0.41
A8	West of Broadway	Yesler Way to E Roy St	N/A	0.55	0.46	0.59	0.48
A9	South of NE 45th St	7th Ave NE to Montlake Blvd NE	N/A	0.54	0.60	0.59	0.64
A10	East of 15th Ave NE	NE 45th St to NE 52nd St	N/A	0.58	0.53	0.64	0.57
A11	South of Northgate Way (N/NE 110th St)	N Northgate Way to Roosevelt Way NE	N/A	0.46	0.54	0.49	0.58
A12	East of 1st Ave NE	NE 100th St to NE Northgate Way	N/A	0.44	0.51	0.47	0.52

Source: Fehr & Peers, 2023.

Intersection LOS—NE 130th / NE 145th Street Subarea

Exhibit 3.10-69 summarizes the LOS and vehicle delay for each study intersection under Alternative 5. Delays would generally be longest under Alternative 5. Under Alternative 5, impacted intersections would include the six intersections identified under the other alternatives as well as the intersection of NE 130th Street/Roosevelt Way NE/5th Avenue NE which would fall from LOS D to LOS E. Impacted intersections include:

- N 145th Street / Aurora Avenue N
- NE 145th Street / 5th Avenue NE
- NE 145th Street / 15th Avenue NE
- N 130th Street / Aurora Avenue N
- N 130th Street / 1st Avenue NE
- NE 130th Street/Roosevelt Way NE/5th Avenue NE
- NE 125th Street / 15th Avenue NE

Exhibit 3.10-69. 130th/145th Street Subarea PM Peak Hour Level of Service—Alternative 5

ID	Intersection	Alternative 1, No Action—Level of Service / Delay (seconds)	Alternative 5—Level of Service / Delay (seconds)
1	NE 155th St / 5th Ave NE	B / 19	B / 20
2	**N 145th St / Aurora Ave N**	**E / 68**	**F / 81**
3	N 145th St / Meridian Ave N	B / 18	C / 21
4	N 145th St / 1st Ave NE	B / 20	C / 27
5	NE 145th St / I-5 On & Off Ramps	A / 9	A / 9
6	**NE 145th St / 5th Ave NE**	**E / 69**	**F / 98**
7	**NE 145th St / 15th Ave NE**	**E / 66**	**F / 89**
8	N 137th St / Meridian Ave N / Roosevelt Way N	A / 7	A / 8
9	**N 130th St / Aurora Ave N**	**E / 79**	**F / 97**
10	N 130th St / Meridian Ave N	B / 13	C / 31
11	**N 130th St / 1st Ave NE**	**E / 71**	**F / 121**
12	NE 130th St / I-5 On Ramp	A / 2	A / 2
13	**NE 130th St / Roosevelt Way NE / 5th Ave NE**	D / 38	**E / 56**
14	Roosevelt Way NE / NE 125th St / 10th Ave NE	B / 17	C / 21
15	**NE 125th St / 15th Ave NE**	**E / 60**	**F / 83**

Note: Impacted intersections are shown in bold.
Source: Fehr & Peers, 2023.

State Facilities

Exhibit 3.10-70 shows a comparison of Alternative 5 forecasted volume to the maximum service volume ~~ratios for Alternative 1 and Alternative 5~~needed to maintain the LOS standard at each of the identified state facility study locations. Alternative 3 ~~V~~volumes at all locations are expected to remain similar or increase relative to Alternative 1 and to the other action alternatives as the assumed growth under Alternative 5 is highest among the alternatives. I-5 at the Ship Canal Bridge and north of the West Seattle Bridge, SR 99 at the Aurora Bridge, SR 509 at the 1st Avenue Bridge, and SR 522 south of NE 145th Street are forecasted to have demand more than 20% over the maximum service volume, indicating substantial vehicle congestion for some hours of the day. Again, the same seven study locations projected to exceed the WSDOT LOS standard under Alternative 1 would do so under Alternative 5. At six of those locations, the ratio is projected to increase by at least 0.01, constituting a significant impact under Alternative 5:

- I-5 at the Ship Canal Bridge
- I-5 north of the West Seattle Bridge
- SR 99 north of N Northgate Way
- SR 99 at the Aurora Avenue Bridge
- SR 509 at the 1st Avenue S Bridge
- SR 522 south of NE 145th Street

One study location is expected to exceed the WSDOT LOS standard, but would have volumes roughly equivalent to Alternative 1, and therefore is not considered to be a significant impact under Alternative 5:

- I-5 north of NE Northgate Way

Because Alternative 5 would cause volumes to increase on multiple state facilities already expected to exceed WSDOT's LOS D standard under Alternative 1, a significant impact to state facilities is expected under Alternative 5.

Exhibit 3.10-70. ~~PM Peak Hour~~Daily State Facilities Level of Service—Alternative 5

Facility	Extents	WSDOT LOS Standard	Alternative 1, No Action—Volume to Maximum Service Volume Ratio	Alternative 5—Volume to Maximum Service Volume Ratio
I-5	North of NE Northgate Way	D	1.03	1.03
I-5	**Ship Canal Bridge**	D	~~1.32~~>1.20	**>1.20**~~1.35~~
I-5	**North of West Seattle Bridge**	D	>1.20~~1.32~~	**>1.20**~~1.33~~
I-5	North of Boeing Access Rd Ramp	D	0.98	0.99
I-90	Mt Baker Tunnel	D	0.97	0.99
SR 99	**North of N Northgate Way**	D	1.08	**1.14**
SR 99	**Aurora Ave Bridge**	D	>1.20~~1.30~~	**>1.20**~~1.37~~

Facility	Extents	WSDOT LOS Standard	Alternative 1, No Action—Volume to Maximum Service Volume Ratio	Alternative 5—Volume to Maximum Service Volume Ratio
SR 99	Tunnel	D	0.65	0.68
SR 99	North of West Seattle Bridge	D	0.76	0.78
SR 99	South of S Cloverdale St	E (mitigated)	0.41	0.44
SR 509	**1st Ave S Bridge**	D	>1.20~~1.25~~	**>1.20**~~1.29~~
SR 519	S Atlantic St West of I-90 Ramps	D	0.83	0.86
SR 520	Lake Washington Bridge	D	0.86	0.88
SR 522	**South of NE 145th St**	D	1.15	**>1.20**~~1.21~~

Note: Impacted locations are shown in bold.
A ratio of >1.2 indicates a demand of more than 20% over the maximum service volume, indicating substantial vehicle congestion for some hours of the day. The WSDOT standard is equivalent to a 1.0 (the denominator is the maximum volume at which LOS D can be maintained).
Source: Fehr & Peers, 2023.

Sensitivity Test

As noted earlier, the regionwide transit forecasts projected by PSRC's activity-based model are higher than the previous trip-based regional model. A sensitivity test was performed to understand how the impacts to certain transit and vehicle metrics might change if the transit forecasts were more closely aligned with the previous iteration of the regional model. This test assumes that transit trips would at most double from existing conditions to future conditions. For King County and regionwide, this would reduce transit trips in Alternative 5 (the highest growth action alternative) by 30% and if all those trips were to shift to vehicular modes, automobile trips would increase by 3 to 4%. For the sensitivity test, the transit trips were reduced by 30% for Alternatives 1 and 5 and the SOV and HOV trips were increased proportionally to maintain the same total number of trips. For metrics that do not have a direct relationship with the number of transit trips, the number of vehicle trips was increased by 5%.

Exhibit 3.10-71 summarizes the SOV mode share expected under the adjusted Alternative 1 and Alternative 5. The SoundCast model predicts that Alternative 5 SOV mode shares will be essentially the same as Alternative 1. Although the Duwamish subarea and West Seattle subarea would exceed their targets, the difference in mode share relative to adjusted Alternative 1 is expected to be less than the 1% impact threshold. Therefore, no SOV mode share impact is expected under the adjusted Alternative 5.

Exhibit 3.10-71. PM Peak Hour SOV Mode Share—Alternative 5 Sensitivity Test

Subarea	SOV Target	Alternative 1, No Action—Adjusted SOV Share	Alternative 5—Adjusted SOV Share
(1) Northwest Seattle	37%	35%	35%
(2) Northeast Seattle	35%	28%	28%
(3) Queen Anne/Magnolia	38%	35%	35%
(4) Downtown/Lake Union	18%	12%	12%
(5) Capitol Hill/Central District	28%	27%	28%
(6) West Seattle	35%	37%	36%
(7) Duwamish	51%	68%	68%
(8) Southeast Seattle	38%	32%	32%

Source: Fehr & Peers, 2023.

Exhibit 3.10-72 shows the trips by mode for the City of Seattle for Alternative 1 and Alternative 5 assuming a 30% reduction in transit trips for each scenario.

Exhibit 3.10-72. Daily Person Trips by Mode—Alternative 5 Sensitivity Test

Mode	Alternative 1—SoundCast	Alternative 1—Adjusted	Alternative 5—SoundCast	Alternative 5—Adjusted
SOV	1,783,000	1,972,000	1,908,000	2,104,000
HOV	1,440,000	1,592,000	1,537,000	1,694,000
Transit	1,138,000	797,000	1,178,000	825,000
Walk	1,378,000	1,378,000	1,453,000	1,453,000
Bike	99,000	99,000	105,000	105,000
Total	**5,838,000**	**5,838,000**	**6,181,000**	**6,181,000**

Source: Fehr & Peers, 2023.

Assuming a 30% reduction in transit loading, **Exhibit 3.10-73** summarizes the projected load factors on the busiest segment of each route in the peak direction of travel. Under the SoundCast results, Alternative 1 had eight impacted routes; with a reduction in ridership, the number of impacted routes would be four. Notably, the light rail lines would not be projected to be over capacity. Compared to Alternative 1, the Alternative 5 adjusted results indicate three routes would be impacted, slightly fewer than is projected using the unadjusted SoundCast results.

Exhibit 3.10-73. PM Peak Hour Average Passenger Load Factors—Sensitivity Test

Transit Route	Maximum Passenger Load Factor in Peak Direction	
	Alternative 1, No Action—Adjusted	Alternative 5—Adjusted
Link light rail—1 Line	0.76	0.74
Link light rail—2 Line	0.90	0.93
Link light rail—3 Line	0.91	0.85
RapidRide C Line—Westwood Village to Alaska Junction	0.50	0.63
RapidRide E Line—Downtown to Aurora Village	**1.33**	**1.40**
RapidRide G Line—Downtown to Madison Valley	0.24	0.27
RapidRide H Line—Alki to Burien	0.54	0.59
RapidRide J Line—Downtown to University District	**1.38**	**1.87**
RapidRide R Line—Downtown to Rainier Valley	0.75	0.83
RapidRide 23rd	0.33	0.34
RapidRide 65th (replaces Route 62)	0.57	0.68
RapidRide Beacon	0.35	0.41
RapidRide Denny	**1.98**	1.77
RapidRide Fremont (replaces Route 40)	**1.05**	**1.17**
RapidRide Green Lake	0.33	0.29
RapidRide Market	0.53	0.54

Source: Fehr & Peers, 2023.

Exhibit 3.10-74 summarizes VMT, VHT and average trip speed under the revised alternatives assuming a 5% increase in vehicle trips. Because the VMT per capita under Alternative 5 would not exceed the level under Alternative 1, no impact to VMT per capita is identified under Alternative 5.

Exhibit 3.10-74. Daily VMT, VHT, and Average Trip Speed—Alternative 5 Sensitivity Test

Metric	Alternative 1, No Action		Alternative 5	
	Total	Per Capita	Total	Per Capita
VMT	25,575,000	14.4	26,378,200	14.1
VHT	909,100	0.5	951100	0.5
Average Trip Speed	28.1	-	27.7	-

Source: Fehr & Peers, 2023.

Exhibit 3.10-75 summarizes PM peak hour screenline V/C ratios for adjusted Alternative 1 and Alternative 5, assuming a 5% increase in volumes. While the V/C ratios would increase, some to very near the thresholds, all screenlines would still be expected to fall within their threshold under both Alternative 1 and Alternative 5. In other words, the comparative impact conclusion would remain the same between the unadjusted and adjusted results.

Exhibit 3.10-75. PM Peak Hour Screenline Volume-to-Capacity Ratio—Alternative 5 Sensitivity Test

Screenline	Location	Extents	V/C Threshold	Alternative 1, No Action		Alternative 5	
				N/E	S/W	N/E	S/W
1.11	North City Limit	3rd Ave NW to Aurora Ave N	1.20	0.79	0.68	0.79	0.76
1.12	North City Limit	Meridian Ave N to 15th Ave NE	1.20	0.50	0.41	0.48	0.49
1.13	North City Limit	30th Ave NE to Lake City Way NE	1.20	0.89	0.65	0.87	0.70
2.00	Magnolia	Magnolia Bridge to W Emerson Place	1.00	0.61	0.64	0.64	0.71
3.11	Duwamish River	West Seattle Bridge & Spokane St	1.20	0.76	0.85	0.78	0.92
3.12	Duwamish River	1st Ave S & 16th Ave S	1.20	0.72	0.96	0.75	1.01
4.11	South City Limit	Martin Luther King Jr. Way to Rainier Ave S	1.00	0.87	0.91	0.97	0.97
4.12	South City Limit	Marine Dr SW to Meyers Way S	1.00	0.46	0.51	0.51	0.54
4.13	South City Limit	SR 99 to Airport Way S	1.00	0.66	0.49	0.71	0.49
5.11	Ship Canal	Ballard Bridge	1.20	1.06	0.95	1.12	1.01
5.12	Ship Canal	Fremont Bridge	1.20	1.05	1.08	1.18	1.19
5.13	Ship Canal	Aurora Bridge	1.20	1.01	0.74	1.06	0.78
5.16	Ship Canal	University & Montlake Bridges	1.20	0.78	0.99	0.86	1.08
6.11	South of NW 80th St	Seaview Ave NW to 15th Ave NW	1.00	0.42	0.55	0.44	0.57
6.12	South of N W 80th St	8th Ave NW to Greenwood Ave N	1.00	0.63	0.65	0.65	0.69
6.13	South of NE 80th St	Linden Ave N to 1st Ave NE	1.00	0.54	0.62	0.56	0.65
6.14	South of NE 80th St	5th Ave NE to 15th Ave NE	1.00	0.68	0.72	0.77	0.80
6.15	South of NE 80th St	20th Ave NE to Sand Point Way NE	1.00	0.43	0.41	0.49	0.47
7.11	West of Aurora Ave	Fremont Pl N to N 65th St	1.00	0.67	0.66	0.71	0.71
7.12	West of Aurora Ave	N 80th St to N 145th St	1.00	0.46	0.47	0.50	0.53
8.00	South of Lake Union	Valley St to Denny Way	1.20	0.53	0.37	0.56	0.41
9.11	South of Spokane St	Beach Dr SW to W Marginal Way SW	1.00	0.54	0.86	0.57	0.92

Screenline	Location	Extents	V/C Threshold	Alternative 1, No Action		Alternative 5	
				N/E	S/W	N/E	S/W
9.12	South of Spokane St	E Marginal Way S to Airport Way S	1.00	0.68	0.55	0.70	0.57
9.13	South of Spokane St	15th Ave S to Rainier Ave S	1.00	0.72	0.63	0.77	0.70
10.11	South of S Jackson St	Alaskan Way S to 4th Ave S	1.00	0.85	0.86	0.90	0.91
10.12	South of S Jackson St	12th Ave S to Lakeside Ave S	1.00	0.78	0.78	0.85	0.83
12.12	East of CBD	S Jackson St to Howell St	1.20	0.39	0.46	0.41	0.47
13.11	East of I-5	NE Northgate Way to NE 145th St	1.00	0.74	0.56	0.80	0.58
13.12	East of I-5	NE 65th St to NE 80th St	1.00	0.57	0.53	0.64	0.60
13.3	East of I-5	NE Pacific St to NE Ravenna Blvd	1.00	0.64	0.59	0.72	0.63
A1	North of Seneca St	1st Ave to 6th Ave	N/A	0.66	0.68	0.70	0.71
A2	North of Blanchard	Elliott Ave to Westlake Ave	N/A	0.47	0.39	0.50	0.41
A3	East of 9th Ave	Lenora St to Pike St	N/A	0.48	0.99	0.48	1.00
A4	South of Mercer St	Elliott Ave W to Aurora Ave N	N/A	0.58	0.62	0.62	0.65
A5	East of 5th Ave N	Denny Way to Valley St	N/A	0.43	0.39	0.44	0.43
A6	North of Pine St	Melrose Ave E to 15th Ave E	N/A	0.43	0.44	0.45	0.46
A7	North of James St– E Cherry St	Boren Ave to 14th Ave	N/A	0.59	0.41	0.61	0.43
A8	West of Broadway	Yesler Way to E Roy St	N/A	0.58	0.48	0.62	0.50
A9	South of NE 45th St	7th Ave NE to Montlake Blvd NE	N/A	0.57	0.63	0.62	0.67
A10	East of 15th Ave NE	NE 45th St to NE 52nd St	N/A	0.61	0.56	0.67	0.60
A11	South of Northgate Way (N/NE 110th)St)	N Northgate Way to Roosevelt Way NE	N/A	0.48	0.57	0.51	0.61
A12	East of 1st Ave NE	NE 100th St to NE Northgate Way	N/A	0.46	0.54	0.49	0.55

Source: Fehr & Peers, 2023.

Exhibit 3.10-76 shows a comparison of the adjusted Alternative 5 volumes to the maximum service volume needed to maintain the LOS standard ~~ratios for adjusted Alternative 1 and Alternative 5~~ at each of the identified state facility study locations. Nine study locations are projected to exceed the WSDOT LOS standard under adjusted Alternative 1 and would also do so under adjusted Alternative 5. At all of these locations, the ratio is projected to increase by at least 0.01, constituting a significant impact under adjusted Alternative 5. This is three more impacts than were identified under the unadjusted Alternative 5.

Exhibit 3.10-76. ~~PM Peak Hour~~Daily State Facilities Level of Service—Alternative 5 Sensitivity Test

Facility	Extents	WSDOT LOS Standard	Alternative 1, No Action—Volume to Maximum Service Volume Ratio	Alternative 5—Volume to Maximum Service Volume Ratio
I-5	North of NE Northgate Way	D	1.08	**1.09**
I-5	**Ship Canal Bridge**	D	>1.20~~1.39~~	**>1.20**~~1.42~~
I-5	**North of West Seattle Bridge**	D	>1.20~~1.38~~	**>1.20**~~1.39~~
I-5	North of Boeing Access Rd Ramp	D	1.03	**1.04**
I-90	Mt Baker Tunnel	D	1.02	**1.04**
SR 99	**North of N Northgate Way**	D	1.13	**1.20**
SR 99	**Aurora Ave Bridge**	D	>1.20~~1.37~~	**>1.20**~~1.44~~
SR 99	Tunnel	D	0.68	0.71
SR 99	North of West Seattle Bridge	D	0.80	0.82
SR 99	South of S Cloverdale St	E (mitigated)	0.43	0.46
SR 509	**1st Ave S Bridge**	D	>1.20~~1.32~~	**>1.20**~~1.35~~
SR 519	S Atlantic St West of I-90 Ramps	D	0.88	0.91
SR 520	Lake Washington Bridge	D	0.90	0.93
SR 522	**South of NE 145th St**	D	1.20	**>1.20**~~1.27~~

Note: Impacted locations are shown in bold.
A ratio of >1.2 indicates a demand of more than 20% over the maximum service volume, indicating substantial vehicle congestion for some hours of the day. The WSDOT standard is equivalent to a 1.0 (the denominator is the maximum volume at which LOS D can be maintained).
Source: Fehr & Peers, 2023.

Summary of Draft EIS Alternative Impacts

Exhibit 3.10-77 summarizes the potential impacts to Seattle's transportation system under each alternative studied in the Draft EIS. The purpose of an EIS is to disclose how potential actions by the City may impact the transportation system in comparison to what is expected to occur with currently adopted zoning codes and policies. Therefore, the impacts of each action alternative ~~is~~ are assessed against the performance of the transportation system under the No Action Alternative. The impacts identified under the No Action Alternative are also expected to occur under the action alternatives even if those alternatives would not result in additional impacts. Although the focus of the EIS is not to mitigate conditions under the currently adopted zoning code (i.e., the No Action Alternative), many of the mitigation measures proposed for the action alternatives would also lessen impacts under the No Action Alternative.

Comparison to the Preferred Alternative

The Draft EIS alternatives were analyzed before the Seattle Transportation Plan (STP) was adopted. Based on the findings of the revised modeling that includes assumptions consistent with the network maps, policy direction, and candidate projects of the STP, it is likely that the Draft EIS alternatives would have slightly more impacts to general purpose vehicles and state facilities with the STP in place. For example, the City may choose to increase the capacity to move people along its right-of-way by reallocating space to transit. A reallocation of general purpose travel lanes would make more efficient use of city streets and help accommodate growth, but could have a secondary impact on auto travel. Therefore, the screenline impacts identified for the Preferred Alternative may also occur with some of the Draft EIS alternatives. This is consistent with Section 3.10.3 in the Draft EIS, which identified that transportation mitigation projects could have secondary impacts.

All action alternatives are expected to have significant impacts to transit passenger load, corridor travel time, intersection LOS in the NE 130th/NE 145th Street Subarea, and state facilities. Impacts of Alternatives 2 and 3 would be similar to one another while impacts of Alternative 5 are expected to be higher in magnitude due to the increased growth. Alternative 4 would fall within this range, likely closer in magnitude to Alternatives 2 and 3 than Alternative 5. **Exhibit 3.10-77** details the types and number of impacts expected under each alternative.

Exhibit 3.10-77. Overview of Significant Adverse Impacts: ~~All~~ Draft EIS Alternatives

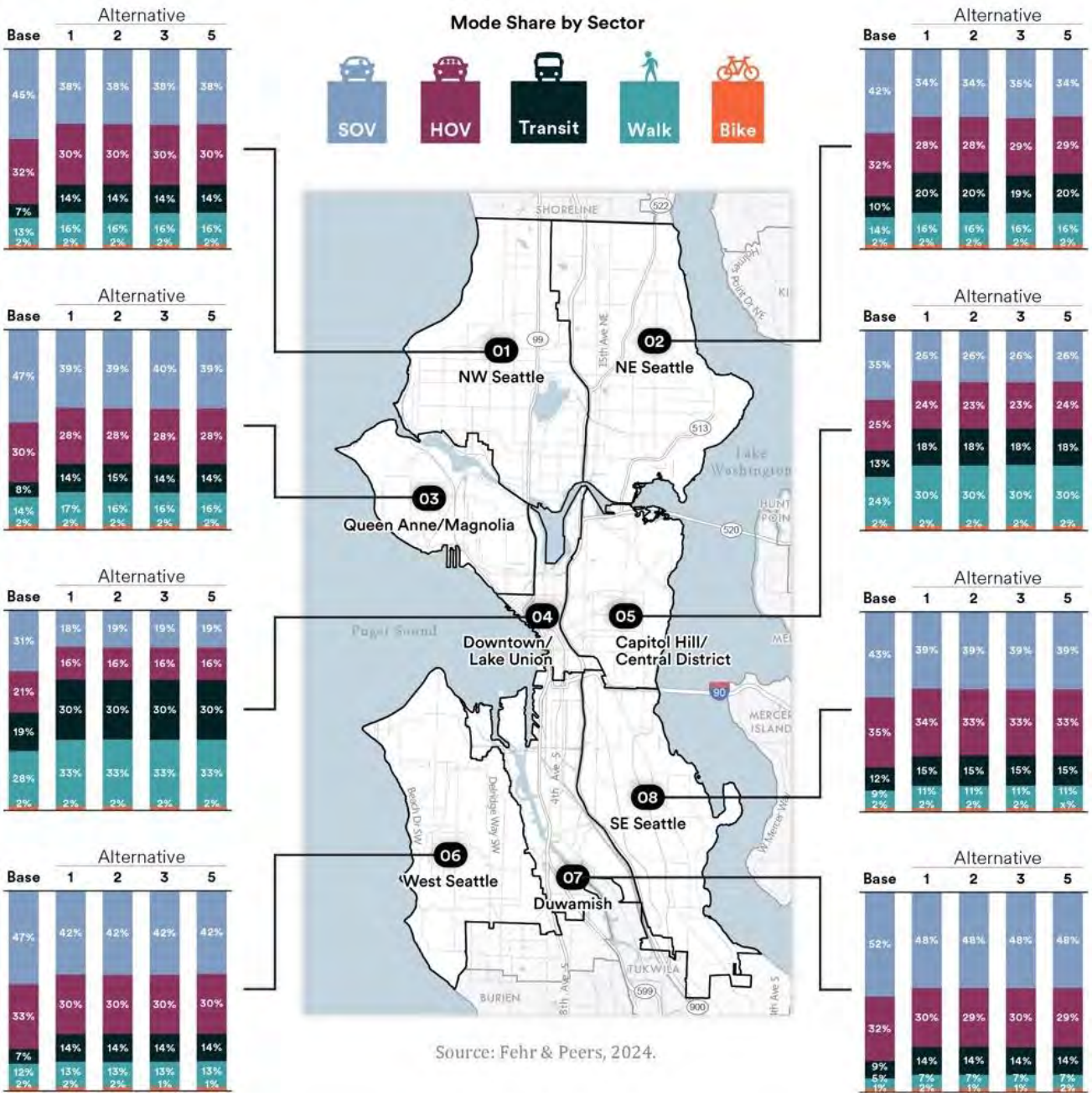
Impact Type	Alt. 1—No Action	Alt. 2—Focused	Alt. 3—Broad	Alt. 5—Combined
SOV Mode Share	Duwamish subarea impacted	No additional impacts beyond No Action	No additional impacts beyond No Action	No additional impacts beyond D No Action
VMT per Capita	No	No	No	No
Active Transportation	No	No	No	No
Transit	8 routes: Light Rail 1, 2, and 3 Lines; RapidRide E, J, R, Denny & Fremont	8 routes under No Action + additional impacts to	8 routes under No Action + additional impacts to	8 routes under No Action + additional impacts to

Impact Type	Alt. 1—No Action	Alt. 2—Focused	Alt. 3—Broad	Alt. 5—Combined
		RapidRide E, J, K & Fremont	RapidRide E, J, K & Fremont	RapidRide E, J, K & Fremont
Roadway Users				
Corridor Travel Time	4 corridors: Mercer, Stewart, Olive & Michigan	4 corridors under No Action + additional impact to Olive	4 corridors under No Action + additional impact to Olive	4 corridors under No Action + additional impact to Olive
Screenline	No	No	No	No
130th/145th Subarea Intersection LOS	6 intersections: 145th/Aurora, 145th/5th, 145th/15th, 130th/Aurora, 130th/1st & 125th/15th	Additional impacts to the 6 intersections impacted under No Action	Additional impacts to the 6 intersections impacted under No Action	Additional impacts to the 6 intersections impacted under No Action + impact at 130th/Roosevelt/5th
State Facilities	7 segments along I-5, SR 99, SR 509 & SR 522	7 segments under No Action + additional impacts along I-5, SR 99, & SR 522	7 segments under No Action + additional impacts along I-5, SR 99, & SR 522	7 segments under No Action + additional impacts along I-5, SR 99, SR 509 & SR 522
Safety	No	No	No	No

Source: Fehr & Peers, 2023.

Exhibit 3.10-78 and **Exhibit 3.6-79** summarizes some of the key metrics across the alternatives graphically.

Exhibit 3.10-78. Transportation Metrics Across the Draft EIS Alternatives



Note: Base refers to 2019. All alternatives are studied with 2044 as a horizon year.
Source: Fehr& Peers, 2024.

Exhibit 3.10-79. Citywide Transportation Metrics across the Draft EIS Alternatives

Note: This exhibit was updated since the Draft EIS to reflect revised vehicle miles and hours traveled.
Source: Fehr & Peers, 2023.

Impacts of Preferred Alternative

Note: The impacts analysis for the Preferred Alternative was added since the Draft EIS.

This section evaluates the transportation impacts of the Preferred Alternative which has a similar magnitude of household and employment growth as Alternative 5. Since the Draft EIS was published in March 2024, the City adopted the Seattle Transportation Plan (STP). The SoundCast travel demand model was updated for this Final EIS to reflect the network maps, policy direction, and candidate projects identified in the STP. While the specific project list will be refined over time, the revisions to the model reflect the overarching goals of the STP to make active transportation and transit more convenient choices for Seattle residents and employees. Therefore, the STP candidate projects reflect the reallocation of some general purpose roadway capacity to become dedicated transit (or transit and freight) lanes which provide better speed and reliability for those modes, increase the capacity to move people along a corridor, and accommodate increased growth.

As noted in the Draft EIS, some transportation mitigation projects could have secondary impacts. For example, the City may choose to increase the capacity to move people along its right-of-way by reallocating space to transit. A reallocation of general purpose travel lanes would make more efficient use of city streets and help accommodate growth, but could have a secondary impact on auto travel. These types of secondary effects are apparent in the findings of the Final EIS revised modeling. The revised modeling indicates that it is likely that the Draft EIS alternatives would have slightly more impacts to roadway users and state facilities with the STP network and policy in place. For example, the screenline impacts identified for the Preferred Alternative may also occur with some of the Draft EIS alternatives. As required, the City would prepare additional analysis and take public and stakeholder input into consideration before implementing specific transportation improvement projects, whether they are included in the STP or identified as mitigation for an action alternative. SDOT may choose not to pursue these projects due to potential impacts and future outcomes from community engagement, but they are used as a reasonably likely assumption to assess the proposed land use alternative.

Because the focus of this EIS is the Comprehensive Plan land use proposal, the STP assumptions were incorporated into an updated Alternative 1, No Action, (called “Alternative 1, No Action, with STP” in the tables in the remainder of this section) as well as the Preferred Alternative models. This section uses the updated Alternative 1, No Action, as the baseline for comparison to isolate the effects that can be expected as a result of the Preferred Alternative.

Mode Share

Exhibit 3.10-80 summarizes the SOV mode share expected with the Alternative 1, No Action, and Preferred Alternative. The SoundCast model predicts that the Preferred Alternative SOV mode shares would be very similar to or slightly lower than Alternative 1, No Action. Although the Duwamish sector would exceed its target, the SOV mode share is projected to be slightly

lower with the Preferred Alternative than with Alternative 1, No Action. Therefore, the Preferred Alternative is not expected to cause a significant impact to mode share.

Exhibit 3.10-80. PM Peak Hour SOV Mode Share—Preferred Alternative

Sector	SOV Target	Alternative 1, No Action, with STP SOV Share	Preferred Alternative SOV Share
(1) Northwest Seattle	37%	32%	31%
(2) Northeast Seattle	35%	25%	24%
(3) Queen Anne/Magnolia	38%	32%	32%
(4) Downtown/Lake Union	18%	10%	10%
(5) Capitol Hill/Central District	28%	26%	26%
(6) West Seattle	35%	34%	33%
(7) Duwamish	51%	66%	65%
(8) Southeast Seattle	38%	31%	31%

Note: Existing (2017-2019) mode share data from the PSRC household travel survey have substantial margins of error. See **Exhibit 3.10-10** for margins of error by sector.
Source: Fehr & Peers, 2024.

Exhibit 3.10-81 compares the number of daily person trips expected by mode with 2044 Alternative 1, No Action, and the Preferred Alternative. Citywide, the Preferred Alternative is expected to result in approximately 389,000 additional person trips than Alternative 1, No Action, an increase of 7%. While the total number of trips would increase with the Preferred Alternative, the relative mode shares are expected to be very similar to Alternative 1, No Action.

Exhibit 3.10-81. Daily Person Trips by Mode—Preferred Alternative

Mode	Alternative 1, No Action, with STP	Preferred Alternative
SOV	1,784,000	1,897,000
HOV	1,539,000	1,664,000
Transit	1,148,000	1,209,000
Walk	1,373,000	1,459,000
Bike	106,000	111,000
Total	**5,950,000**	**6,340,000**

Source: Fehr & Peers, 2024.

Transit

Exhibit 3.10-82 summarizes the projected load factors on the busiest segment of each study route in the peak direction of travel with impacts shown in bold. King County Metro continually

tracks ridership by route and trip using their automatic passenger counters allowing them to revise service to adapt to changing demands. This evaluation indicates transit pathways that may have demand in excess of the currently planned service, but in practice King County Metro would regularly adapt service to better meet the highest demand corridors or riders may choose to travel at different times to avoid the most crowded trips, sometimes called "peak spreading." The potentially impacted routes include:

- Link Light Rail – 2 Line
- RapidRide E Line—Downtown to Aurora Village
- RapidRide J Line—Downtown to University District
- RapidRide R Line—Downtown to Rainier Valley
- RapidRide 65th
- RapidRide Denny
- RapidRide Fremont

Exhibit 3.10-82. PM Peak Hour Average Passenger Load Factors—Preferred Alternative

Transit Route	Maximum Passenger Load Factor in Peak Direction	
	Alternative 1, No Action, with STP	Preferred Alternative
Link light rail—1 Line	0.97	0.99
Link light rail—2 Line	1.38	**1.45**
Link light rail—3 Line	1.33	1.37
RapidRide C Line—Westwood Village to Alaska Junction	0.67	0.91
RapidRide E Line—Downtown to Aurora Village	1.98	**2.17**
RapidRide G Line—Downtown to Madison Valley	0.37	0.43
RapidRide H Line—Alki to Burien	0.78	0.78
RapidRide J Line—Downtown to University District	2.03	**2.18**
RapidRide R Line—Downtown to Rainier Valley	1.01	**1.12**
RapidRide 23rd	0.41	0.46
RapidRide 65th (replaces Route 62)	0.93	**1.08**
RapidRide Beacon	0.50	0.51
RapidRide Denny	2.90	**3.11**
RapidRide Fremont (replaces Route 40)	1.66	**1.87**
RapidRide Green Lake	0.47	0.61
RapidRide Market	0.91	0.89

Note: Impacted routes are shown in bold.
Source: Fehr & Peers, 2025.

As noted in the **Sensitivity Test** section, the regionwide transit forecasts projected by PSRC's activity-based model are higher than the previous trip-based regional model. Refer to that section for a sensitivity test to understand how the impacts to certain transit and vehicle metrics may change if the transit forecasts were more closely aligned with the previous iteration of the regional model.

Roadway Users

Results related to roadway users are summarized in the following sections.

VMT / VHT / Average Trip Speed

Exhibit 3.10-83 summarizes VMT, VHT, and average trip speed with the Preferred Alternative relative to Alternative 1, No Action. The Preferred Alternative would result in higher total VMT and VHT because it assumes a higher level of growth than Alternative 1, No Action, and would also result in lower average trip speed at just over 27 mph. Despite the increase in VMT, the VMT per capita would be lower than Alternative 1, No Action, at 13.2 VMT per Seattle resident and employee.

Exhibit 3.10-83. Daily VMT, VHT, and Average Trip Speed—Preferred Alternative

	Alternative 1, No Action, with STP		Preferred Alternative	
Metric	Total	Per Capita	Total	Per Capita
VMT	24,411,300	13.5	25,216,800	13.2
VHT	877,300	0.5	925,000	0.5
Average Trip Speed	27.8	—	27.3	—

Source: Fehr & Peers, 2025.

Because the VMT per capita with the Preferred Alternative would not exceed the level expected with Alternative 1, No Action, the Preferred Alternative is not expected to cause a significant impact to VMT per capita.

Travel Time

Exhibit 3.10-84 summarizes PM peak hour corridor travel times under the Preferred Alternative compared to Alternative 1, No Action.[95] **Exhibit 3.10-85** and **Exhibit 3.10-86** display the LOS values along associated corridors on the map for Alternative 1, No Action, and the Preferred Alternative, respectively. Corridor travel times are expected to increase by up to 2.5 minutes compared to Alternative 1, No Action, and no corridors are expected to have lower travel times than with Alternative 1, No Action. Under Alternative 1, No Action, with the STP

[95] For corridors with peak directional patterns, the AM peak hour would typically reflect similar conditions in the opposite direction from those shown for the PM peak hour.

network in place, 68 corridors (with each direction counted separately) are expected to operate at LOS A-C, 21 at LOS D, 9 corridors at LOS E, and 6 corridors at LOS F. Under the Preferred Alternative, 64 corridors are expected to operate at LOS A-C, 23 at LOS D, 10 corridors at LOS E, and 7 corridors at LOS F.

Based on the thresholds of significance defined for this EIS, the Preferred Alternative is expected to result in significant travel time impacts to three corridors (shown in bold in **Exhibit 3.10-84**):

- Mercer Street between Elliott Avenue West and Fairview Avenue North
- Denny Way between Queen Anne Ave N to E Madison St
- Stewart Street between 1st Avenue and Denny Way

Exhibit 3.10-84. PM Peak Hour Travel Time Corridor Level of Service—Preferred Alternative

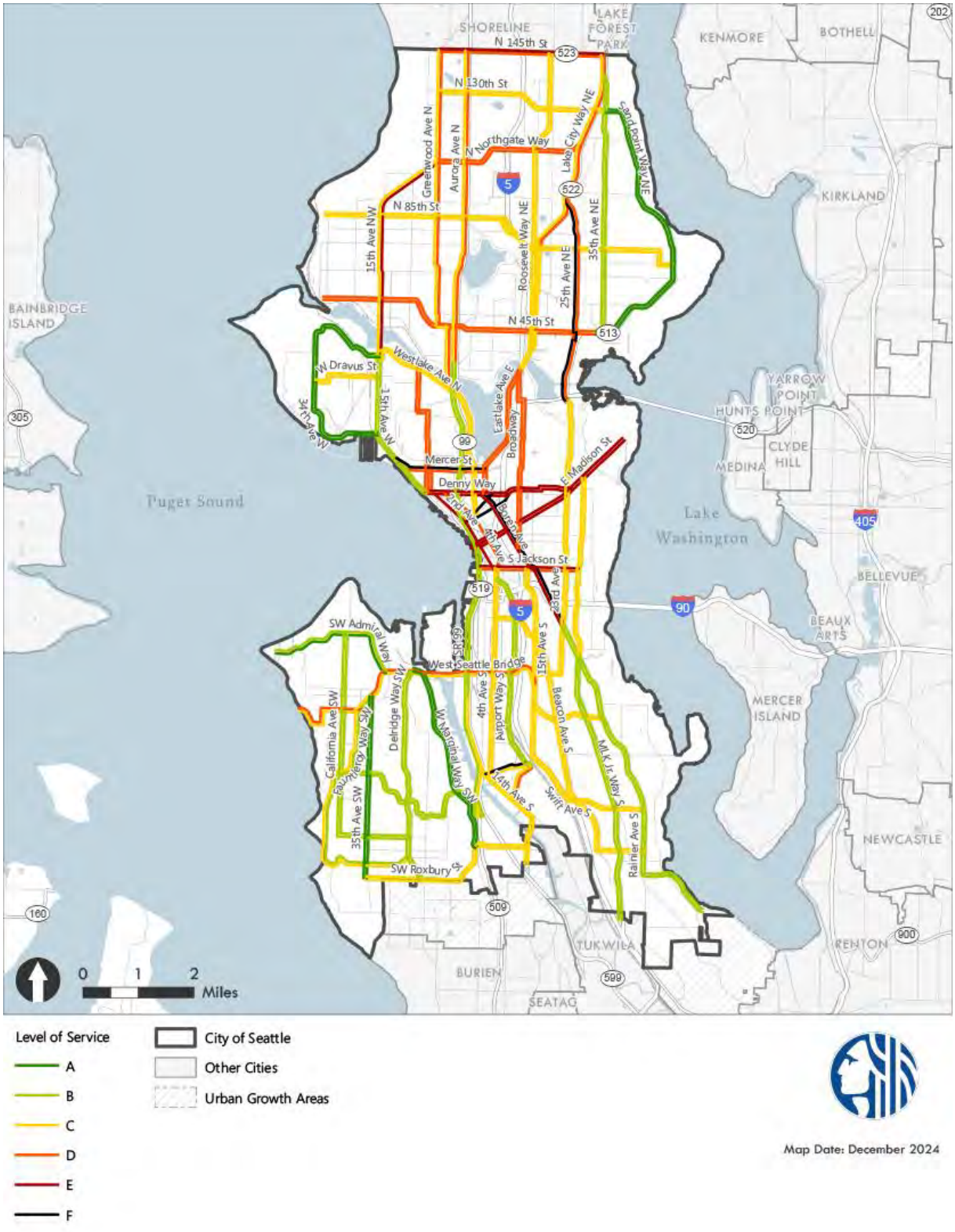
		Alternative 1, No Action, with STP Minutes / Level of Service		Preferred Alternative Minutes / Level of Service	
Roadway	Extents	N/E	S/W	N/E	S/W
N 145th St	Greenwood Ave N to Lake City Way NE	12 / D	12.5 / E	12.5 / E	12.5 / E
N 130th St	Greenwood Ave N to 35th Ave NE	13 / C	14 / C	13.5 / C	14.5 / C
N Northgate Way	Greenwood Ave N to Lake City Way NE	13.5 / D	13.5 / D	14 / D	14 / D
N 85th St	32nd Ave NW to Sand Point Way NE	25.5 / C	26.5 / C	27 / C	27 / C
N 45th St	32nd Ave NW to Union Bay Pl NE	27 / D	26.5 / D	28.5 / D	27.5 / D
15th Ave NW	W Emerson St to N 105th St	20 / E	13 / C	22 / E	13.5 / C
Greenwood Ave N	Nickerson St to N 145th St	31 / D	27 / C	33.5 / D	28 / C
Aurora Ave N	N 38th St to N 145th St	20 / D	16.5 / C	20.5 / D	17 / C
Roosevelt Way NE	Fuhrman Ave E to N 145th St	27 / C	25.5 / C	29.5 / D	26 / C
Lake City Way NE	NE 75th St to N 145th St	15 / D	11.5 / C	15.5 / D	11.5 / C
25th Ave NE	E Roanoke St to Lake City Way NE	19.5 / D	28 / F	22 / D	28.5 / F
35th Ave NE	Union Bay Pl NE to Lake City Way NE	16.5 / B	17 / B	17 / B	18 / C
Sand Point Way NE	Union Bay Pl NE to 35th Ave NE	13.5 / A	13 / A	13.5 / A	13 / A
34th Ave W	15th Ave W to15th Ave W	11.5 / A	12 / A	11.5 / A	12.5 / A
W Dravus St	34th Ave W to15th Ave W	5 / C	4.5 / C	5.5 / C	4.5 / C
15th Ave W	Queen Anne Ave N to W Emerson St	9.5 / B	8.5 / B	10.5 / C	8.5 / B
Queen Anne Ave N	Denny Way to Nickerson St	13.5 / D	12.5 / D	14.5 / D	13 / D
SR 99	S Nevada St to N 38th St	12 / B	12.5 / B	13.5 / C	12.5 / B
Westlake Ave N	Stewart St to W Emerson St	17.5 / C	19.5 / C	18.5 / C	20 / D
Eastlake Ave E	Denny Way to Fuhrman Ave E	12.5 / D	12 / D	13 / D	12 / D
Broadway	Boren Ave to Eastlake Ave E	17.5 / D	17.5 / D	18 / D	17.5 / D

		Alternative 1, No Action, with STP Minutes / Level of Service		Preferred Alternative Minutes / Level of Service	
Roadway	Extents	N/E	S/W	N/E	S/W
23rd Ave	E Madison St to E Roanoke St	7 / C	6 / C	7 / C	6.5 / C
Mercer St	**Elliott Ave W to Fairview Ave N**	9 / D	15 / F	9 / D	**16 / F**
Denny Way	**Queen Anne Ave N to E Madison St**	18.5 / E	17.5 / E	**19.5 / F**	18 / E
2nd Ave	4th Ave S to Denny Way	- / -	12 / E	- / -	12 / E
4th Ave	S Jackson St to Denny Way	9.5 / D	- / -	10 / E	- / -
Stewart St	**1st Ave to Denny Way**	- / -	6 / F	- / -	**6.5 / F**
Olive Way	4th Ave to Denny Way	7.5 / F	- / -	7.5 / F	- / -
E Madison St	Alaskan Way S to McGilvra Blvd E	21.5 / E	21 / E	21.5 / E	21.5 / E
Boren Ave	23rd Ave S to Denny Way	21 / F	17.5 / E	21.5 / F	17.5 / E
S Jackson St	Alaskan Way S to MLK Jr. Way S	9 / D	11.5 / E	9.5 / D	11.5 / E
23rd Ave	15th Ave S to E Madison St	16.5 / C	17.5 / C	17.5 / C	18 / D
MLK Jr. Way S	Rainier Ave S to E Madison St	12 / C	12 / C	12.5 / C	12.5 / C
4th Ave S	E Marginal Way S to S Jackson St	13.5 / C	12 / C	14 / C	12 / C
Airport Way S	S Albro Pl to 4th Ave S	11 / B	10 / B	11 / B	10 / B
15th Ave S	S Jackson St to Rainier Ave S	16.5 / C	17.5 / C	16.5 / C	18 / C
E Marginal Way S	S Holden St to S Nevada St	5.5 / C	5 / B	5.5 / C	5 / B
Swift Ave S	Rainier Ave S to S Columbian Way	14 / C	14.5 / C	14.5 / C	15 / D
Beacon Ave S	Rainier Ave S to 4th Ave S	23 / C	26 / C	23 / C	26.5 / C
MLK Jr. Way S	S Boeing Access Rd to Rainier Ave S	16.5 / B	16.5 / B	17.5 / B	16.5 / B
Rainier Ave S	Cornell Ave S to 23rd Ave S	19.5 / B	21.5 / B	20 / B	22 / B
S Michigan St	E Marginal Way S to Airport Way S	3.5 / C	4.5 / F	3.5 / C	4.5 / F
Ellis Ave S	E Marginal Way S to Airport Way S	3 / D	3.5 / C	3 / D	3.5 / C

		Alternative 1, No Action, with STP Minutes / Level of Service		Preferred Alternative Minutes / Level of Service	
Roadway	Extents	N/E	S/W	N/E	S/W
14th Ave S	S Director St to 1st Ave S	8 / C	7.5 / C	8 / C	8 / C
California Ave SW/SW Thistle St	Delridge Way SW to SW Admiral Way	17.5 / B	17.5 / B	17.5 / B	18 / C
Fauntleroy Way SW/SW Barton St	Delridge Way SW to 35th Ave SW	15.5 / B	18.5 / C	16 / B	18.5 / C
35th Ave SW	SW Roxbury St to Fauntleroy Way SW	9 / A	9.5 / A	9.5 / A	10 / B
Delridge Way SW	SW Roxbury St to W Marginal Way SW	12 / B	14 / B	12 / B	14.5 / C
W Marginal Way SW	S Cloverdale St to Delridge Way SW	8 / A	8.5 / A	8.5 / A	8.5 / A
SW Admiral Way	63rd Ave SW to SW Manning St	7 / A	8.5 / B	7 / A	9 / C
West Seattle Bridge	35th Ave SW to 15th Ave S	8.5 / C	11 / D	9 / C	12 / D
SW Alaska St	Beach Dr SW to 35th Ave SW	7 / C	8 / D	7 / C	8 / D
Sylvan Way SW	California Ave SW to S Holden St	12.5 / B	11.5 / B	12.5 / B	12.5 / B
SW Roxbury St	35th Ave SW to 14th Ave S	12.5 / C	12 / C	13 / C	13 / C

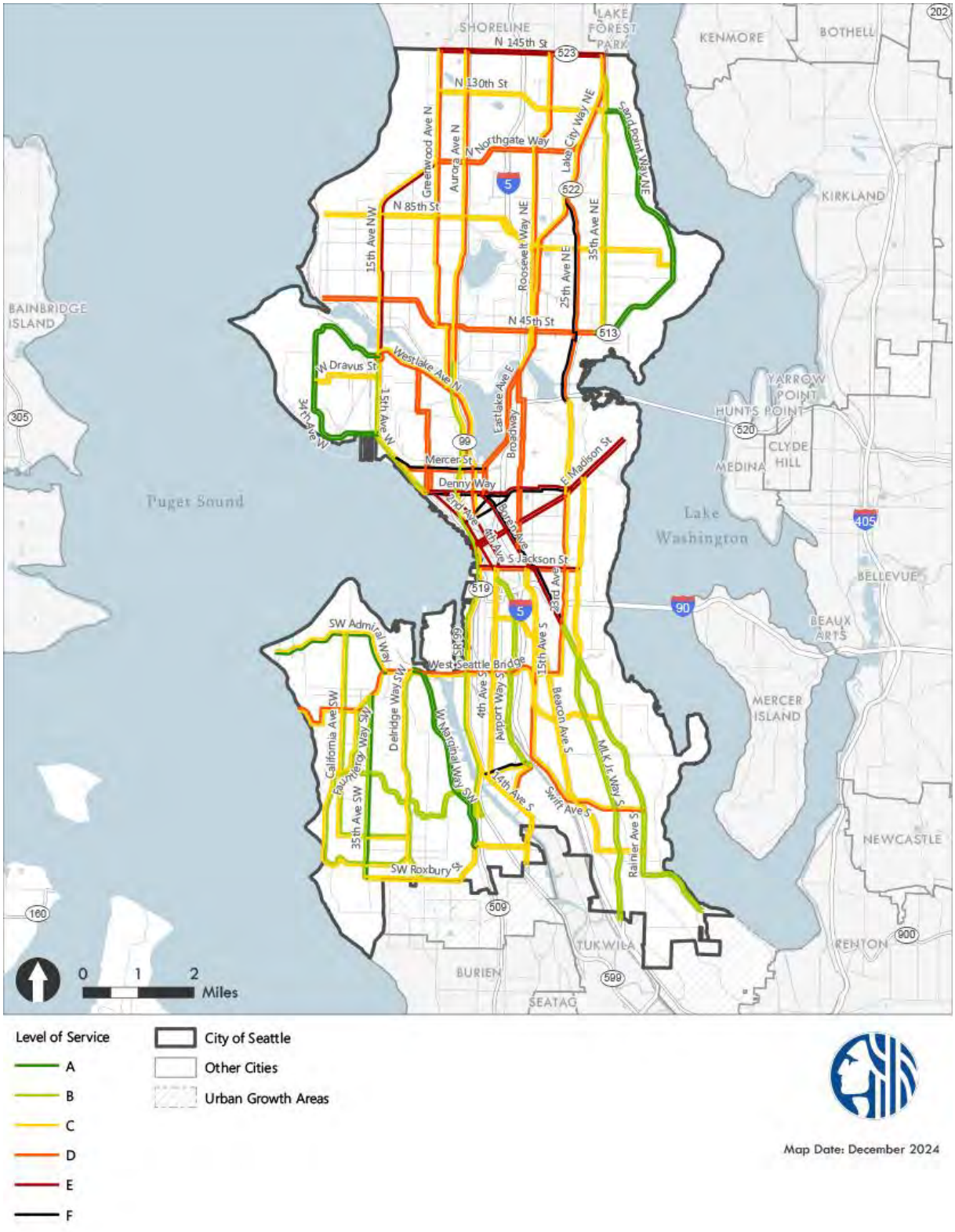
Note: Impacted corridors are shown in bold.
Source: Fehr & Peers, 2025.

Exhibit 3.10-85. Alternative 1, No Action, with STP—Travel Time Corridor LOS



Source: Fehr & Peers, 2025.

Exhibit 3.10-86. Preferred Alternative—Travel Time Corridor LOS



Source: Fehr & Peers, 2025.

Screenlines

Exhibit 3.10-87 summarizes PM peak hour screenline V/C ratios for 2044 Alternative 1, No Action, and the Preferred Alternative. Across all screenlines combined, the volume forecasts are approximately four percent higher with the Preferred Alternative than the Alternative 1, No Action. There are nine screenlines with V/C ratios higher than 0.90, compared with seven in Alternative 1, No Action. The screenlines exceeding 0.90 are:

- North City Limit – 30th Ave NE to Lake City Way NE
- South City Limit – Martin Luther King Jr Way to Rainier Ave S (Preferred Alternative only)
- Ship Canal – Ballard Bridge
- Ship Canal – Fremont Bridge
- Ship Canal – Aurora Ave N Bridge
- Ship Canal – University and Montlake Bridges
- South of Spokane St – Beach Dr SW to W Marginal Way SW (Preferred Alternative only)
- East of I-5 – NE Northgate Way to NE 145th St
- East of 9th Avenue

The screenline east of I-5 is expected to exceed the City's V/C threshold with both Alternative 1, No Action, and the Preferred Alternative, but does not constitute a significant impact because the change in volume would not meet the 0.01 V/C increase threshold of significance. Two of the screenlines are expected to exceed the established thresholds with both Alternative 1, No Action, and the Preferred Alternative and the increase relative to Alternative 1, No Action, would be more than the 0.01 threshold of significance:

- Ship Canal – Fremont Bridge
- Ship Canal – University and Montlake Bridges

Therefore, two significant impacts to screenlines are expected with the Preferred Alternative. These results indicate that the demand to cross the Ship Canal by general purpose vehicles would exceed the capacity of these three bridges. In addition to some demand shifting to the Ballard and Aurora Avenue bridges as shown in **Exhibit 3.10-87**, the model indicates that demand on I-5 over the Ship Canal would increase. See the State Facilities section for results.

Exhibit 3.10-87. PM Peak Hour Screenline Volume-to-Capacity Ratio—Preferred Alternative

Screenline	Location	Extents	V/C Threshold	Alternative 1, No Action, with STP		Preferred Alternative	
				N/E	S/W	N/E	S/W
1.11	North City Limit	3rd Ave NW to Aurora Ave N	1.20	0.89	0.78	0.88	0.83
1.12	North City Limit	Meridian Ave N to 15th Ave NE	1.20	0.59	0.49	0.58	0.54
1.13	North City Limit	30th Ave NE to Lake City Way NE	1.20	0.93	0.70	0.93	0.73
2.00	Magnolia	Magnolia Bridge to W Emerson Place	1.00	0.58	0.62	0.64	0.70
3.11	Duwamish River	West Seattle Bridge & Spokane St	1.20	0.73	0.83	0.75	0.89
3.12	Duwamish River	1st Ave S & 16th Ave S	1.20	0.68	0.85	0.69	0.88
4.11	South City Limit	Martin Luther King Jr. Way to Rainier Ave S	1.00	0.84	0.90	0.90	0.93
4.12	South City Limit	Marine Dr SW to Meyers Way S	1.00	0.47	0.52	0.51	0.53
4.13	South City Limit	SR 99 to Airport Way S	1.00	0.58	0.41	0.62	0.42
5.11	Ship Canal	Ballard Bridge	1.20	1.08	0.95	1.11	0.98
5.12	**Ship Canal**	**Fremont Bridge**	1.20	1.13	>1.20	1.17	**>1.20**
5.13	Ship Canal	Aurora Ave Bridge	1.20	1.03	0.77	1.07	0.77
5.16	**Ship Canal**	**University & Montlake Bridges**	1.20	0.90	>1.20	0.93	**>1.20**
6.11	South of NW 80th St	Seaview Ave NW to 15th Ave NW	1.00	0.40	0.46	0.43	0.47
6.12	South of NW 80th St	8th Ave NW to Greenwood Ave N	1.00	0.63	0.58	0.67	0.60
6.13	South of NE 80th St	Linden Ave N to 1st Ave NE	1.00	0.53	0.62	0.55	0.62
6.14	South of NE 80th St	5th Ave NE to 15th Ave NE	1.00	0.71	0.82	0.77	0.82
6.15	South of NE 80th St	20th Ave NE to Sand Point Way NE	1.00	0.50	0.44	0.55	0.46
7.11	West of Aurora Ave	Fremont Pl N to N 65th St	1.00	0.65	0.66	0.69	0.70
7.12	West of Aurora Ave	N 80th St to N 145th St	1.00	0.73	0.66	0.78	0.70
8.00	South of Lake Union	Valley St to Denny Way	1.20	0.57	0.41	0.59	0.43
9.11	South of Spokane St	Beach Dr SW to W Marginal Way SW	1.00	0.54	0.88	0.58	0.92

Screenline	Location	Extents	V/C Threshold	Alternative 1, No Action, with STP		Preferred Alternative	
				N/E	S/W	N/E	S/W
9.12	South of Spokane St	E Marginal Way S to Airport Way S	1.00	0.71	0.50	0.72	0.51
9.13	South of Spokane St	15th Ave S to Rainier Ave S	1.00	0.76	0.69	0.79	0.73
10.11	South of S Jackson St	Alaskan Way S to 4th Ave S	1.00	0.82	0.82	0.84	0.85
10.12	South of S Jackson St	12th Ave S to Lakeside Ave S	1.00	0.75	0.81	0.78	0.84
12.12	East of CBD	S Jackson St to Howell St	1.20	0.39	0.43	0.40	0.44
13.11	East of I-5	NE Northgate Way to NE 145th St	1.00	>1.00	0.87	>1.00	0.89
13.12	East of I-5	NE 65th St to NE 80th St	1.00	0.65	0.60	0.71	0.66
13.3	East of I-5	NE Pacific St to NE Ravenna Blvd	1.00	0.73	0.68	0.77	0.72
A1	North of Seneca St	1st Ave to 6th Ave	N/A	0.63	0.63	0.67	0.65
A2	North of Blanchard	Elliott Ave to Westlake Ave	N/A	0.46	0.40	0.48	0.42
A3	East of 9th Ave	Lenora St to Pike St	N/A	0.47	0.92	0.50	0.92
A4	South of Mercer St	Elliott Ave W to Aurora Ave N	N/A	0.62	0.70	0.67	0.70
A5	East of 5th Ave N	Denny Way to Valley St	N/A	0.51	0.49	0.51	0.51
A6	North of Pine St	Melrose Ave E to 15th Ave E	N/A	0.37	0.39	0.39	0.41
A7	North of James St– E Cherry St	Boren Ave to 14th Ave	N/A	0.51	0.35	0.51	0.36
A8	West of Broadway	Yesler Way to E Roy St	N/A	0.60	0.53	0.65	0.56
A9	South of NE 45th St	7th Ave NE to Montlake Blvd NE	N/A	0.52	0.65	0.54	0.67
A10	East of 15th Ave NE	NE 45th St to NE 52nd St	N/A	0.61	0.62	0.69	0.65
A11	South of Northgate Way (N/NE 110th St)	N Northgate Way to Roosevelt Way NE	N/A	0.60	0.70	0.59	0.71
A12	East of 1st Ave NE	NE 100th St to NE Northgate Way	N/A	0.55	0.62	0.57	0.53

Note: Impacted corridors are shown in bold.
Source: Fehr & Peers, 2025.

Intersection LOS—NE 130th / NE 145th Street Subarea

Exhibit 3.10-88 summarizes the LOS and vehicle delay for each study intersection under the Preferred Alternative. As noted earlier, the SoundCast travel demand model was updated for this Final EIS to reflect the network maps, policy direction, and candidate projects identified in the STP. These assumptions were also carried through to the traffic operations analysis at the intersection level. Most relevant to this subarea are the assumed reconfiguration of NE 130th Street and NE 145th Street to reallocate some general purpose vehicle capacity to facilities for other modes such as transit lanes, bicycle lanes, and/or widened sidewalks.

Under the Preferred Alternative, seven intersections are expected to have increases in delay relative to Alternative 1, No Action, that would constitute significant impacts:

- N 145th Street / Aurora Avenue N
- NE 145th Street / 15th Avenue NE
- N 130th Street / Aurora Avenue N
- N 130th Street / Meridian Avenue N
- N 130th Street / 1st Avenue NE
- Roosevelt Way NE / NE 125th St / 10th Ave NE
- NE 125th Street / 15th Avenue NE

Exhibit 3.10-88. 130th/145th Street Subarea PM Peak Hour Level of Service—Preferred Alternative

ID	Intersection	Alternative 1, No Action, with STP—Level of Service / Delay (seconds)	Preferred Alternative—Level of Service / Delay (seconds)
1	NE 155th St / 5th Ave NE	B / 17	C / 22
2	**N 145th St / Aurora Ave N**	**F / 98**	**F / 126**
3	N 145th St / Meridian Ave N	C / 24	C / 29
4	N 145th St / 1st Ave NE	C / 28	D / 37
5	NE 145th St / I-5 On & Off Ramps	A / 5	A / 6
6	NE 145th St / 5th Ave NE	C / 30	D / 44
7	**NE 145th St / 15th Ave NE**	**E / 73**	**E / 79**
8	N 137th St / Meridian Ave N / Roosevelt Way N	B / 14	C / 20
9	**N 130th St / Aurora Ave N**	**F / 83**	**F / 124**
10	**N 130th St / Meridian Ave N**	D / 43	**E / 66**
11	**N 130th St / 1st Ave NE**	**F / >150**	**F / >150**
12	NE 130th St / I-5 On Ramp	B / 12	B / 13
13	NE 130th St / Roosevelt Way NE / 5th Ave NE	C / 34	D / 37

ID	Intersection	Alternative 1, No Action, with STP—Level of Service / Delay (seconds)	Preferred Alternative—Level of Service / Delay (seconds)
14	**Roosevelt Way NE / NE 125th St / 10th Ave NE**	D / 32	**F / 58**
15	**NE 125th St / 15th Ave NE**	**F / 95**	**F / 126**

Note: Impacted intersections are shown in bold.
Source: Fehr & Peers, 2025.

State Facilities

Exhibit 3.10-89 shows a comparison of the Preferred Alternative forecasted volume to the maximum service volume needed to maintain the LOS standard at each of the identified state facility study locations. I-5 at the Ship Canal Bridge and north of the West Seattle Bridge, SR 99 at the Aurora Bridge and north of N Northgate Way, SR 509 at the 1st Avenue Bridge and SR 522 south of NE 145th Street are forecasted to have demand more than 20% over the maximum service volume, indicating substantial vehicle congestion for some hours of the day. The locations with the highest expected congestion are the I-5 Ship Canal Bridge and the SR 99 Aurora Avenue Bridge, reflecting that general purpose vehicle capacity across the Ship Canal is provided via a limited number of bridges. Volumes at all locations are expected to remain similar or increase relative to Alternative 1, No Action.

Eight study locations are projected to operate at or above the maximum service volume for LOS D with both Alternative 1, No Action, and the Preferred Alternative. At all eight of those locations, the Preferred Alternative would result in volume to maximum service volume ratios increasing by at least 0.01, constituting a significant impact:

- I-5 north of NE Northgate Way
- I-5 at the Ship Canal Bridge
- I-5 north of the West Seattle Bridge
- I-90 at the Mount Baker Tunnel
- SR 99 north of N Northgate Way
- SR 99 at the Aurora Avenue Bridge
- SR 509 at the 1st Avenue S Bridge
- SR 522 south of NE 145th Street

Because the Preferred Alternative would cause volumes to increase on multiple state facilities already expected to fall below WSDOT's LOS D standard with Alternative 1, No Action, a significant impact to state facilities is expected with the Preferred Alternative.

Exhibit 3.10-89. Daily State Facilities Level of Service—Preferred Alternative

Facility	Extents	WSDOT LOS Standard	Alternative 1, No Action, with STP—Volume to Maximum Service Volume Ratio	Preferred Alternative—Volume to Maximum Service Volume Ratio
I-5	**North of NE Northgate Way**	D	1.02	**1.03**
I-5	**Ship Canal Bridge**	D	>1.20	**>1.20**
I-5	**North of West Seattle Bridge**	D	>1.20	**>1.20**
I-5	North of Boeing Access Rd Ramp	D	0.98	0.98
I-90	**Mt Baker Tunnel**	D	1.00	**1.01**
SR 99	**North of N Northgate Way**	D	1.20	**>1.20**
SR 99	**Aurora Ave Bridge**	D	>1.20	**>1.20**
SR 99	Tunnel	D	0.65	0.69
SR 99	North of West Seattle Bridge	D	0.77	0.79
SR 99	South of S Cloverdale St	E (mitigated)	0.44	0.45
SR 509	**1st Ave S Bridge**	D	>1.20	**>1.20**
SR 519	S Atlantic St West of I-90 Ramps	D	0.86	0.90
SR 520	Lake Washington Bridge	D	0.88	0.91
SR 522	**South of NE 145th St**	D	>1.20	**>1.20**

Note: Impacted locations are shown in bold.
A ratio of >1.2 indicates a demand of more than 20% over the maximum service volume, indicating substantial vehicle congestion for some hours of the day. The WSDOT standard is equivalent to a 1.0 (the denominator is the maximum volume at which LOS D can be maintained).
Source: Fehr & Peers, 2025.

3.10.3 Mitigation Measures

The impacts to the transportation system identified in the previous sections include effects on transit passenger load, corridor travel time, screenlines, intersection LOS in the NE 130th/NE 145th Street Subarea, and state facilities~~, and parking~~. This section explores ways in which Seattle could potentially reduce the severity of those adverse impacts. These measures would be considered holistically within the framework of other goals and policies in the Comprehensive Plan. For example, while some transportation impacts identified through the preceding analysis stem from increased traffic congestion, the City has prioritized reducing vehicle demand rather than increasing roadway capacity.

The mitigation strategies described below are organized into main themes though many measures relate to and complement one another.

- Transportation Systems Management and Operations (TSMO)
- Transportation Demand Management (TDM)
- Pedestrian and Bicycle System Improvement
- Transit Strategies
- Parking Management Strategies
- Safety Strategies

Secondary Impacts

Some transportation mitigation projects could have secondary impacts. For example, the City may choose to increase the capacity to move people along its right-of-way by reallocating space to transit. A reallocation of general purpose travel lanes would make more efficient use of city streets and help accommodate growth, but could have a secondary impact on auto travel. ~~For example, converting a general-purpose travel lane or a parking lane to a transit lane, truck-only lane, or cycle track would reduce capacity for autos to travel~~. As required, the City would prepare additional analysis and take public and stakeholder input into consideration before implementing specific transportation improvement projects, whether they are included in the STP or identified as mitigation for an action alternative. Given the programmatic nature of this EIS, this Mitigation Measures section lists the types of projects that could be considered to mitigate potential impacts of the action alternatives.

Regulations & Commitments

Transportation Systems Management and Operations (TSMO)

Transportation systems management and operations (TSMO) maximizes efficiency of the existing multimodal transportation system by implementing low-cost, near-term improvements to improve overall system performance. TSMO solutions can improve safety and provide flexibility to address changing conditions. Strategies can also prioritize movement of specific modes, including freight, transit, and active transportation. Many of these strategies would require coordination with partner agencies, such as Port of Seattle, King County Metro, and Sound Transit.

Seattle already utilizes some TSMO strategies to reduce traffic congestion and improve vehicle flow, including providing drivers with updated travel information and managing the flow of

traffic through intersections. SDOT has an ongoing effort to improve the operations of traffic signals, including some corridors with adaptive signal control, which coordinates signal timing changes in response to real-time traffic volume data in order to reduce traffic congestion and improve vehicular flow. Additionally, the ~~Seattle's *Transit Master Plan, Freight Master*~~*Seattle Transportation Plan*, and *Seattle Industrial Areas Freight Access Project* identify speed and reliability improvements, such as transit and/or freight lanes that could improve mobility for those modes. Expanding existing programs or implementing new TSMO strategies, in coordination with regional partners, could help mitigate impacts to corridor travel time, screenlines, intersection LOS in the NE 130th/NE 145th Street Subarea, and state facilities by increasing efficiency of the existing system.

Potential strategies that Seattle might consider include:

- Intelligent transportation systems (ITS) applications such as dynamic message signs to alert travelers to incidents and provide travel information about route choices.
- Transit signal priority (TSP) to facilitate transit movements at intersections, reducing travel times for transit vehicles.
- Automated enforcement of transit-only lanes and "don't block the box."
- Freight operations management to prioritize freight movements at specific locations and times.
- Reallocating travel lanes to serve specific uses such as transit and/or freight.
- Signal timing to improve vehicular flow along corridors.
- Wayfinding to improve route decisions and reduce illegal movements.
- Geometric or configuration improvements at intersections to facilitate key bus or truck turning movements.
- Improvements to pedestrian facilities such as crosswalk designs for increased safety, curb bulb-outs to reduce the distance to cross a street, curb ramps for accessibility, and signal timing improvements that increase pedestrian visibility at intersections.

Local and regional TSMO strategies could be combined to achieve greater reductions in impacts and maximize efficient operation of the transportation system. Seattle has historically funded some system improvements through voter-approved levies ($365M Bridging the Gap approved in 2006 and $930M Levy to Move Seattle approved in 2015). Since the publication of the Draft EIS, Seattle voters approved a $1.55 billion Seattle Transportation Levy which replaces ~~As~~ the Levy to Move Seattle ~~will~~ that expired at the end of 2024.~~,~~ The Seattle Transportation Levy will provide additional funding to SDOT over the next eight years ~~may consider putting forward a new levy~~ to ~~sustain funding for~~implement continued improvements. Other improvements may require partnering with regional and state agencies.

Transportation Demand Management (TDM)

Transportation demand management (TDM) strategies can help reduce congestion and travel time impacts by reducing demand for automobile travel and supporting travel by other modes.

Seattle currently promotes a variety of TDM strategies to encourage travel by carpooling, vanpooling, transit, walking, and biking, as well as reducing trips by teleworking. These include the Commute Trip Reduction (CTR) Program, Transportation Management Programs (TMPs), and the Commuter Benefits Ordinance which are described below along with additional measures Seattle could consider adding to its programmatic TDM efforts.

Commute Trip Reduction

The Washington State Commute Trip Reduction (CTR) Law, passed in 1991, requires large employers to implement employee commute programs to reduce drive alone peak-hour commute trips, with the goals of reducing traffic congestion and energy use and improving air quality. The CTR Law applies to employer worksites with at least 100 employees who begin work between 6 and 9 AM on weekdays. Employers who meet this threshold must develop commute trip reduction plans and work toward meeting their mode share targets through internal programs and monitoring. Affected employers must:

- Designate a transportation coordinator.
- Distribute information about non-drive alone commute options to employees.
- Survey employees every other year to measure vehicle miles traveled (VMT) and mode choice.
- Implement measures designed to achieve CTR goals adopted by the jurisdiction in which they are located.

The CTR program is currently undergoing a shift in the funding allocation and approach to better meet employer and jurisdictional needs and increase the effectiveness of the program. The changes to the CTR program present an opportunity for Seattle to reevaluate the City's TDM programs and implement new strategies to improve employer-focused TDM efforts and further reduce drive alone travel.

Transportation Management Programs

Seattle requires some large buildings to implement a Transportation Management Program (TMP) as part of the development review process. The TMP includes strategies the building managers must implement to encourage tenants to travel by transit, walking, biking, and/or carpooling. Parking management strategies are often included as well. A TMP typically includes measures such as:

- Travel options information displayed in a centrally located part of the building.
- Transit pass subsidies for tenants.
- Pedestrian and bicycle improvements and wayfinding signs directing tenants to nearby facilities.
- Bike parking and locker/shower facilities.
- Parking management strategies to minimize the number of vehicle trips made to and from the building.
- Preferred parking and subsidies for vanpool and carpool users.
- Telework and hybrid work options

Seattle also works with the building managers to set site-specific mode share targets and adjust the TDM approaches as needed to meet those goals.

Commuter Benefit Ordinance

In 2020, Seattle' Commuter Benefit Ordinance took effect, requiring businesses with 20 or more employees to offer their workers the option of making a pre-tax payroll deduction for transit or vanpool expenses. This program offers a financial incentive to workers and businesses to use non-SOV travel options by lowering their tax obligation.

Mobility Management through Vehicle Pricing

Over the past decade, the City of Seattle and other regional partners have committed to exploring how an equitable vehicle pricing mechanism could be implemented. This concept is also included in the recently adopted STP which identifies market mechanisms such as vehicle pricing as a mobility management strategy that could encourage walking, biking, and transit trips. This could also act as a funding source for transportation investments to transit, walking, and biking. To pursue this strategy, the STP includes the following actions:

- Explore equitable demand management tools that could influence travel choices and create revenues to invest in sustainable transportation options, freight movement, and innovation.
- Work with regional partners as they explore pricing options that are equitable and do not put the city at a competitive economic disadvantage.

Mobility Management through Parking Pricing & Supply

The City of Seattle has also committed to exploring mobility management through parking pricing. As with vehicle pricing, this concept is included in the STP as a mobility management strategy that could encourage walking, biking, and transit trips and supplement funding sources for transportation investments. To pursue this strategy, the STP includes the following actions:

- Expand the geography of and increase rates for paid on-street parking to encourage the use of less expensive and lower-pollution travel options.
- Continue to apply performance-based parking pricing rates and time limits to regulate on-street parking demand.

The amount of parking supply in a particular area also influences travel choices. SDOT could consider changes to its parking requirements (both minimums and maximums) to influence the amount of parking provided with new development.

Additional TDM Measures

In addition to the ongoing programs and ordinances in place, Seattle could consider further expanding their TDM efforts. Research compiled by the California Air Pollution Control Officers Association (CAPCOA), surveys the spectrum of TDM strategies and provides data

demonstrating which approaches can substantially reduce vehicle trips. Additional new or expanded TDM measures could include:

- Expand subsidized transit pass programs.
- Expand trip reduction programs to include new participants such as smaller businesses, residents, or community members.
- Improve bicycle and pedestrian facilities, including last-mile connections and end of trip facilities such as bicycle parking.
- Expand bike share/scooter share programs.

TDM program expansion, combined with other complementary strategies included in this section could help increase non-SOV mode share and reduce congestion to mitigate some impacts of the action alternatives.

Transportation Concurrency & Mitigation

SMC 23.52 subchapter 1 implements GMA policy that transportation improvements or strategies should be made concurrently with land development. SMC 23.52 subchapter 2 requires impact analysis and mitigation for projects meeting certain standards.

Pedestrian & Bicycle System Improvements

Improvements to the pedestrian and bicycle network can help provide last-mile connections and active transportation options that could increase the share of people walking and biking and mitigate impacts related to traffic congestion. Seattle is working to grow its share of people walking to 27% and people bicycling to 8%, by 2044. A well-documented connection exists between improved, safer bicycle and pedestrian accessibility and reduced demand for vehicle travel (CAPCOA 2021).

Seattle has ~~a Pedestrian Master Plan and Bicycle Master Plan~~its Capital Improvement Program and recently adopted STP programmatic directions as well as many subarea plans tailored to specific neighborhoods. All of these plans include recommendations to improve conditions for active transportation modes. Types of projects include concrete sidewalks, asphalt walkways, or painted walkways; signals to make crossing roadways easier and safer; treatments such as rectangular rapid flashing beacons (RRFBs) to alert drivers to people crossing the street; marked crosswalks; curb bulbs or extensions to shorten crossing distances and make people walking more visible to drivers; bicycle lanes (particularly protected and buffered bicycle lanes); and multi-use trails. ~~SDOT is currently working to refine and integrate these prior plans into a single multimodal plan in the upcoming Seattle Transportation Plan.~~

Other pedestrian and bicycle improvements will be implemented in conjunction with forthcoming Link light rail stations~~as part of the City's partnership with Sound Transit to plan for the station areas around the West Seattle and Ballard Link Extensions~~. The~~se~~ West Seattle Link Extension station areas include neighborhoods in Alaska Junction, Avalon, Delridge, and SODO.~~,~~ The Ballard Link Extension station areas include neighborhoods in Chinatown-

International District, Downtown, South Lake Union, Uptown, Smith Cove, Interbay, and Ballard. In addition, new infill stations along the existing 1 Line will include 130th Street and Graham Street stations and the 2 Line connection to Seattle will include the Judkins Park Station. The City and Sound Transit are currently coordinating on transportation improvements around expanded and new light rail stations in these areas to support residents and workers in accessing transit. These projects include better connections to surrounding neighborhoods through sidewalks, bike lanes, and shared use paths, and improving transit connections and transfers through community and mobility hubs.~~While specific projects have not yet been identified, it is assumed that Sound Transit will be constructing improvements in the immediate vicinity of each station as part of their project. Additional improvements could also be implemented through Sound Transit's System Access Fund which awards funds to jurisdictions to design and construct improvements that make it easier and more convenient for people to reach transit. This could include capital projects such as sidewalks, bike lanes, shared use paths, transit integration, and pick-up/drop-off facilities.~~

Seattle could also consider refining its development code to include requirements for pedestrian and bicycle infrastructure as part of frontage improvements. These investments in the multimodal transportation network would help provide alternate travel options and a more complete network, reducing reliance on SOV travel while increasing the share of people walking and biking thereby lessening traffic congestion impacts.

Transit Strategies

Potential impacts to transit passenger load were identified ~~on four RapidRide routes under~~for each of the action alternatives. However, it is unknown how future transit ridership levels will evolve with changing travel trends and land use changes, as demonstrated by the sensitivity test described in the previous section. King County Metro continually tracks ridership by route and trip using their automatic passenger counters allowing them to revise service to adapt to changing demands. The City could utilize an adaptive management approach to monitor crowding in partnership with King County Metro. Should it become apparent that some routes are exceeding King County Metro's crowding thresholds, the City of Seattle and King County Metro could identify potential measures, potentially including reallocating service hours within the city or pursuing funding for increased service levels. ~~The purchase of increased Metro service has occurred in the past via a voter-approved funding measure.~~

Safety Strategies

Potential impacts to safety have been identified under all future year alternatives due to the likely increase of overall exposure associated with higher numbers of people traveling by all modes. SDOT is working to incorporate proven safety countermeasures throughout their capital projects as well as employ a Safe Systems approach. Improvements to the active transportation network, as described in the previous section, could help mitigate some safety issues by providing dedicated facilities to separate people walking, biking, or rolling from

vehicular traffic and adding design elements to increase their visibility to drivers in areas of higher conflict such as intersections.

SDOT has ongoing safety programs that are aimed at reducing the number of collisions. This includes an array of strategies to reduce speeding such as street redesigns, traffic calming, and volume management. Many of the mitigation measures noted in the **Pedestrian & Bicycle System Improvements** section would also benefit safety of vulnerable users including: new sidewalks and walkways; signals to make crossing roadways safer; treatments such as rectangular rapid flashing beacons (RRFBs) to alert drivers to people crossing the street; marked crosswalks; curb bulbs or extensions to shorten crossing distances and make people walking more visible to drivers; protected and buffered bicycle lanes; and multi-use trails. Seattle may expand automated enforcement/safety cameras to help reduce speeding and red light running. SDOT may also pursue expanding strategies such as reducing speed limits, implementing leading pedestrian intervals, traffic calming treatments, new traffic signals, separation of facilities for vulnerable users, and other physical changes to transportation facility design.

These types of projects can reduce not only the number of collisions that occur but also the severity of those that do occur. Projects to address potential safety impacts could be implemented through City-led efforts or in partnership with new development through the development review and permitting process.

Coordination with Washington State Department of Transportation & Ferries

WSDOT and WSF frequently reviews large development projects near state facilities to identify potential impacts and suggest mitigation measures. The City could work with WSDOT and WSF to improve this coordination and to ensure that WSDOT and WSF continue to receive notices if SEPA thresholds are raised.

Other Potential Mitigation Measures

Intersection-Specific Improvements

~~Analysis of the action alternatives, relative to Alternative 1 No Action, identified seven~~ The following ~~impacted~~ intersections could be significantly impacted by one or more action alternatives~~. The impacted intersections are listed below~~:

- N 145th Street / Aurora Avenue N
- NE 145th Street / 5th Avenue NE
- NE 145th Street / 15th Avenue NE
- N 130th Street / Aurora Avenue N
- N 130th Street /Meridian Avenue N
- N 130th Street / 1st Avenue NE

- NE 130th Street / Roosevelt Way NE / 5th Avenue NE
- Roosevelt Way NE / NE 125th St / 10th Avenue NE
- NE 125th Street / 15th Avenue NE

Each intersection was evaluated to identify potential mitigation measures that would address delay impacts such that intersection delays would not exceed the five second impact threshold relative to Alternative 1.

Some impacts could be addressed with more minimal interventions such as signal timing and phasing modifications while others would require physical changes to the intersections to expand capacity, for example adding turn pockets or lanes. However, adding physical capacity to these intersections is likely not practical or desirable due to right-of-way constraints and potential secondary impacts to other modes, and conflicts with the network maps and policy direction included in the adopted STP. As described in the analysis for the Preferred Alternative, the modeling assumptions based on the STP network maps, policy direction, and candidate projects include reconfiguring NE 130th Street and NE 145th Street to reallocate some general purpose vehicle capacity to facilities for other modes such as transit lanes, bicycle lanes, and/or widened sidewalks. The adopted STP also includes potential~~Instead, the City would likely pursue~~ multimodal improvements aimed at making transit, walking, and biking more convenient and comfortable such that people have more options to choose from when traveling through the neighborhood. ~~The STP, described in the following section, outlines the types of multimodal improvements that are being considered.~~ Therefore, it is likely that intersection LOS at some locations would continue to operate below the threshold set forward in this EIS.

Seattle Transportation Plan

The City ~~is currently developing~~adopted the STP in April 2024. The STP ~~which considers how the level of~~guides transportation infrastructure investment ~~in infrastructure~~over the next 20 years with the goal of creating safer, more equitable, reliable, sustainable, and affordable travel options ~~for people walking, biking, and riding transit could improve transportation outcomes~~. ~~The EIS for the STP considers three alternatives:~~

- ~~**No Action**: This alternative represents the future of Seattle's transportation system where the city implements no additional multimodal or other transportation improvements beyond what is funded today. This alternative focuses on optimizing existing conditions in the transportation system with no new additional dedicated space for transit, pedestrians, or bikes. Roadway operations are optimized at key intersections, limited spot safety improvements are made throughout the network, and very limited slow zones are implemented on key pedestrian spaces. *Because this alternative reflects currently adopted plans, this is the network assumed for this Comprehensive Plan EIS.*~~
- ~~**Moderate Pace:** This alternative envisions a future with moderate growth in funding for new multimodal infrastructure in Seattle's transportation system. This alternative takes a modest approach to expanding pedestrian, bicycle, and transit connections. Some space for general~~

purpose vehicular traffic in this alternative would be reallocated to dedicated spaces for other modes including some improvements to the public and pedestrian realm. In this alternative, the city implements a modest set of the overarching policies of the STP. These include some restricted areas for general purpose traffic or "car-lite streets", a moderate number of mobility hubs and speed limits below 20 mph on higher-density residential streets.

- **Rapid Progress:** This alternative envisions a future with strong growth in funding for expanded and enhanced multimodal infrastructure in Seattle's transportation system. This option includes substantial improvements to the pedestrian, bicycle, and transit networks. It reallocates some general-purpose lanes to dedicated spaces for other modes to create a more balanced distribution of space for all mobility options. This alternative also includes a broad range of improvements to the public and pedestrian realm and additional dedicated space for goods movement through the city. In this alternative, the city fully implements overarching policies of the STP with car-free streets, electrification infrastructure, a wider range of mobility hubs, and deploys a road user charge to manage the level of miles driven in personal vehicles.

The proposed STP in February 2024 includes programmatic components as well as a proposed unconstrained list of potential large capital projects, which have been incorporated into the modeling for the Preferred Alternativeproject list derived from the range of potential projects in the Moderate Pace and Rapid Progress alternatives.

Many of the elements of the Moderate Pace and Rapid Progress alternatives listed above could serve as mitigating measures to some of the Comprehensive Plan impacts, namely, transit passenger load, corridor travel time, intersection LOS in the NE 130th/NE 145th Street Subarea, and state facilities. By making non-SOV travel a safer and more convenient option for Seattle's residents, workers, and visitors, the STP could reduce vehicle demand. However, there could also be increased cumulative impacts to corridor travel time, screenlines, and intersection LOS, and state facilities because the Moderate Pace and Rapid Progress alternativesSTP network maps, policy direction, and candidate projects include reductions in roadway general purpose vehicle capacity, whether for car-free streets, car-lite streets, or reallocations of right-of-way to other modes (see **Impacts of Preferred Alternative** section). SDOT may choose not to pursue these projects due to potential impacts and future outcomes from community engagement.It is not possible to identify effects in specific locations as the roadway modifications are not yet known, but there would likely be areas of measurably increased traffic congestion in the vicinities of roadway capacity reductions.

3.10.4 Significant Unavoidable Adverse Impacts

This section identifies the significant and unavoidable adverse impacts to transportation expected to occur with implementation of the action alternatives. Those impacts have been identified relative to the performance of the transportation system if no new actions were taken, i.e., the No Action Alternative. Regardless of the alternative selected, travel demand is expected to increase, resulting in potentially significant adverse impacts to transit passenger

load, corridor travel time, screenlines, intersection LOS in the NE 130th/NE 145th Street Subarea, and state facilities.

Significant impacts to transit were identified under all action alternatives with respect to passenger loads. The mitigation measures described in **Section 3.10.3 Mitigation Measures** could lessen the severity of the passenger load impacts. However, due to the increment of change projected, service levels may not be able to fully mitigate the projected impacts. Therefore, the action alternatives may still result in a significant unavoidable adverse impact to transit capacity.

The City will pursue targeted transportation capacity improvements focused on improved transit, bicycle, pedestrian, and freight connections. Additionally, the City will manage demand using policies, programs, and investments aimed at shifting travel to non-SOV modes. However, the magnitude and duration of traffic congestion during peak periods (as measured using corridor travel time) is expected to be exacerbated as growth continues to occur.

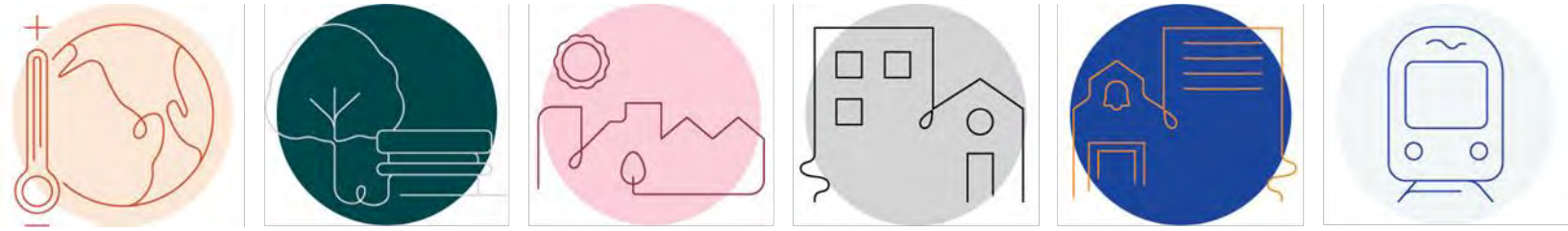
~~As noted in **Section 3.10.3 Mitigation Measures**, some of the impacts to subarea intersections would require physical capacity expansions which are unlikely to be implemented due to right-of-way constraints and potential secondary impacts to other modes. Therefore, the intersection impacts are not expected to be fully mitigated and the action alternatives may still result in a significant unavoidable adverse impact to intersection LOS.~~

Some combination of the travel demand management strategies discussed in **Section 3.10.3 Mitigation Measures** could be implemented to reduce the magnitude of SOV travel. These programmatic measures may lessen the severity of some of the potential impacts, particularly the travel time impacts which are fairly limited in scope. However, in the absence of state facility capacity expansion beyond that already planned and funded or other increased vehicle capacity across the Ship Canal, the action alternatives may still result in significant unavoidable adverse impacts to state facilities and screenlines.

As noted in **Section 3.10.3 Mitigation Measures**, some of the impacts to subarea intersections would require physical capacity expansions which are unlikely to be implemented due to right-of-way constraints and potential secondary impacts to other modes. Therefore, the intersection impacts are not expected to be fully mitigated and the action alternatives may still result in a significant unavoidable adverse impact to intersection LOS.

Intentionally blank

3.11 Public Services



Jefferson Park. Source: City of Seattle, 2023.

This section addresses the potential impacts on public services associated with each alternative. Public services are defined as police, fire, emergency medical; parks and recreation; and schools. These services are provided citywide principally by the City of Seattle for police, fire, and parks, and by the Seattle Public Schools for education. Other providers of public safety include the Port of Seattle, King County Metro, and University of Washington. Other private institutions provide education services. Regarding parks, the focus is on Seattle Parks and Recreation Facilities managed with a level of service for the public. Other recreation facilities that are available to the community include public schools and universities, public street ends, Port recreation facilities, and other public lands like Seattle Center and Hiram M. Chittenden Locks.

Impacts of the alternatives are considered significant if they:

- Result in insufficient parks, open space, and trail capacity to serve expected population based on existing levels of service.
- Create inconsistencies with shoreline public access policies.
- Result in increases in public school enrollment that cannot be accommodated through regular school planning processes.
- Increase demand for police or fire and emergency that can't be accommodated through regular planning and staffing processes.
- Result in insufficient capacity to handle solid waste under current Seattle Public Facility plans.

3.11.1 Affected Environment

Police

Information about police services was collected from the Seattle Police Department (SPD) as well as other law enforcement agencies responsible for patrol in the City of Seattle. Data from SPD's 2019 Strategic Plan and the City's adopted 2021 Budget, and 2023-2028 Capital Improvements Plan published calls for service, response times, and crime reports annually inform this analysis. Independent researchers at Seattle University also collect data at the micro- community level through the annual Seattle Public Safety Survey which is available via SPD's Survey Results Dashboard. Coordination between the EIS authors and SPD's Director of Strategic Initiatives also informed this analysis.

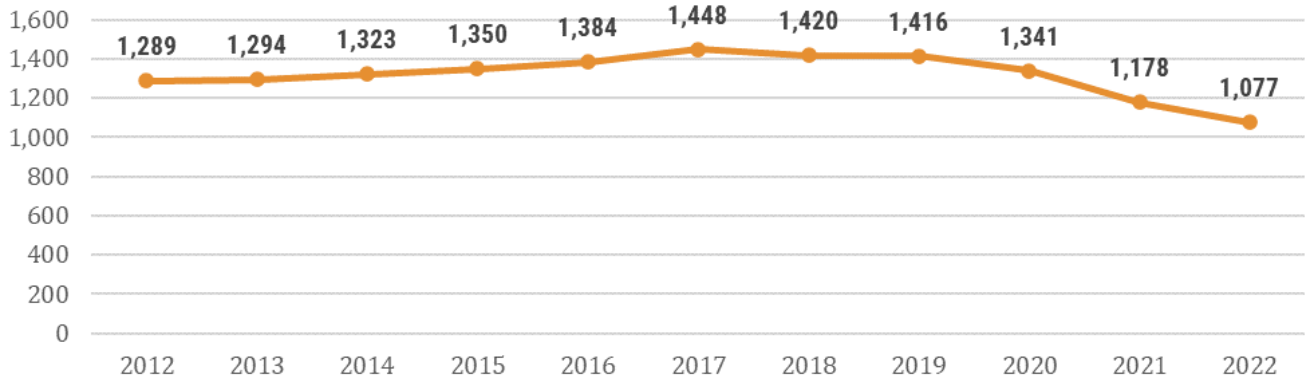
Citywide

Facilities & Staff

The Seattle Police Department (SPD) provides police protection services to the City of Seattle. Its primary duties include foot, car, and bike patrols, harbor patrols, 911 calls, investigations, traffic enforcement, parking enforcement, homeland security, and specialty units such as

Special Weapons and Tactics (SWAT), gang, bomb/arson, and canine units. As of 2022, SPD ~~currently has~~ had 1,077 deployable sworn officers across all precincts and support facilities and between 341 and 405 additional non-officer employees (Washington Association of Sheriffs & Police Chiefs 2022, Socci, 2023). From the same WASP source, a 2023 estimate of sworn officers was 1,065. As of spring 2024, the number of sworn officers was estimated as 917. (Seattle Police Department 2023) **Exhibit 3.11-1** highlights a recent downward trend in officer staffing.

Exhibit 3.11-1. Commissioned SPD Officers



Source: Washington Association of Sheriffs and Police Chiefs, 2023

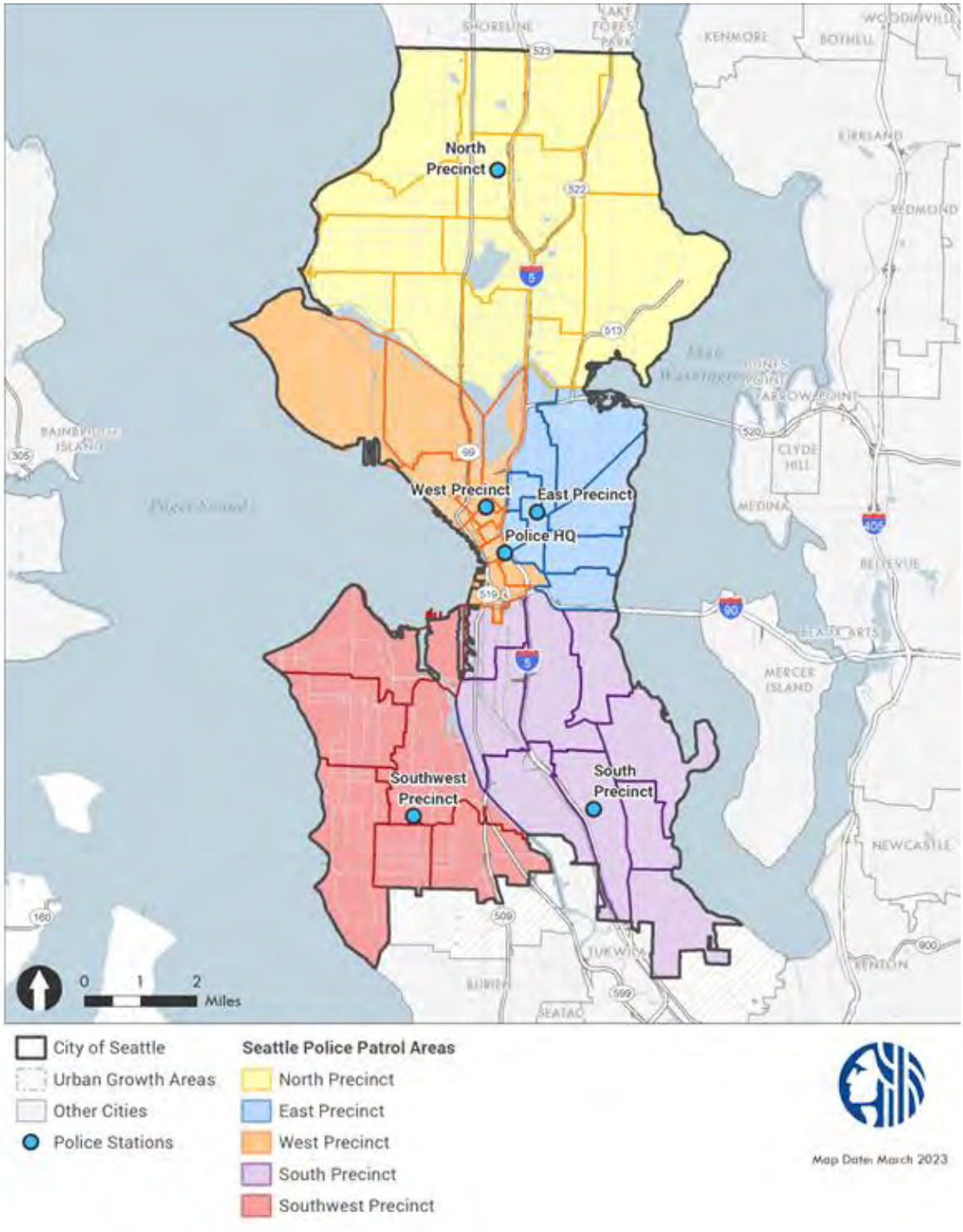
The Department is divided into five precincts, each with a police station that serves as the base of operations for that precinct. Information about the precinct facilities is available in **Exhibit 3.11-2** and the areas of service for each of the precincts are mapped in **Exhibit 3.11-3**.

Exhibit 3.11-2. Police Precinct Facilities

Precinct	Location	Primary Area Served	Sq Ft	Year Built
North	10049 College Way N	North of the Ship Canal to city limits	16,434	1984
West	810 Virginia St	Queen Anne, Magnolia, the Downtown care, and the area west of I-5	46,231	1999
East	1519 12th Ave	Eastlake and the area north of I-90 to the Ship Canal and east of I-5	61,580	1926
South	3001 S Myrtle St East	South of I-90 to city limits and west of the Duwamish	13,688	1983
Southwest	2300 Webster St	West Seattle and the Duwamish Industrial Area	28,531	2002

Source: City of Seattle, 2020

Exhibit 3.11-3. Police Precinct and Beat Boundaries



Sources: City of Seattle 2022; BERK, 2023.

These precincts serve different sectors of city and their alignment with Comprehensive Plan Analysis zones is generally as follows:

A. EIS Study Areas 1 and 2: North Precinct
B. EIS Study Areas 3 and 4: West Precinct
C. EIS Study Area 5: East Precinct
D. EIS Study Area 6: Southwest Precinct
E. EIS Study Areas 7 and 8: South Precinct

Maps illustrating the EIS Study Area boundaries and precincts are available in **Appendix I**.

Police Departments with Shared Jurisdiction

There are some areas and situations where the Seattle Police Department shares enforcement with other agencies.

Port of Seattle Police

The Port of Seattle Police (POSPD) are responsible for patrol and primary law enforcement of multiple different seaport locations as well as SeaTac International Airport which falls outside of the study area. Seaport properties such as the Downtown Seattle terminals, Shilshole Bay Marina, shipping facilities on the Duwamish River, and parts of Harbor Island are monitored by the Marine Patrol Unit and the POSPD Dive Team.

King County Sheriff's Office

Since Seattle is within King County, the King County Sheriff's Office has jurisdictional authority within the city limits as well, but the Seattle Police are considered the primary police agency. SPD works very closely with the King County Sheriff's Office.

Regional Transit Police

Both King County Metro and Sound Transit work closely with SPD but are primarily responsible for transit stops, tunnels, and other regional transit facilities.

Washington State Patrol

The Seattle Police Department shares jurisdictional authority with the Washington State Patrol within the study area's interstate highways.

Washington State Patrol is also the central repository for criminal history information in the State of Washington and runs the Crime Lab for the entire state of Washington.

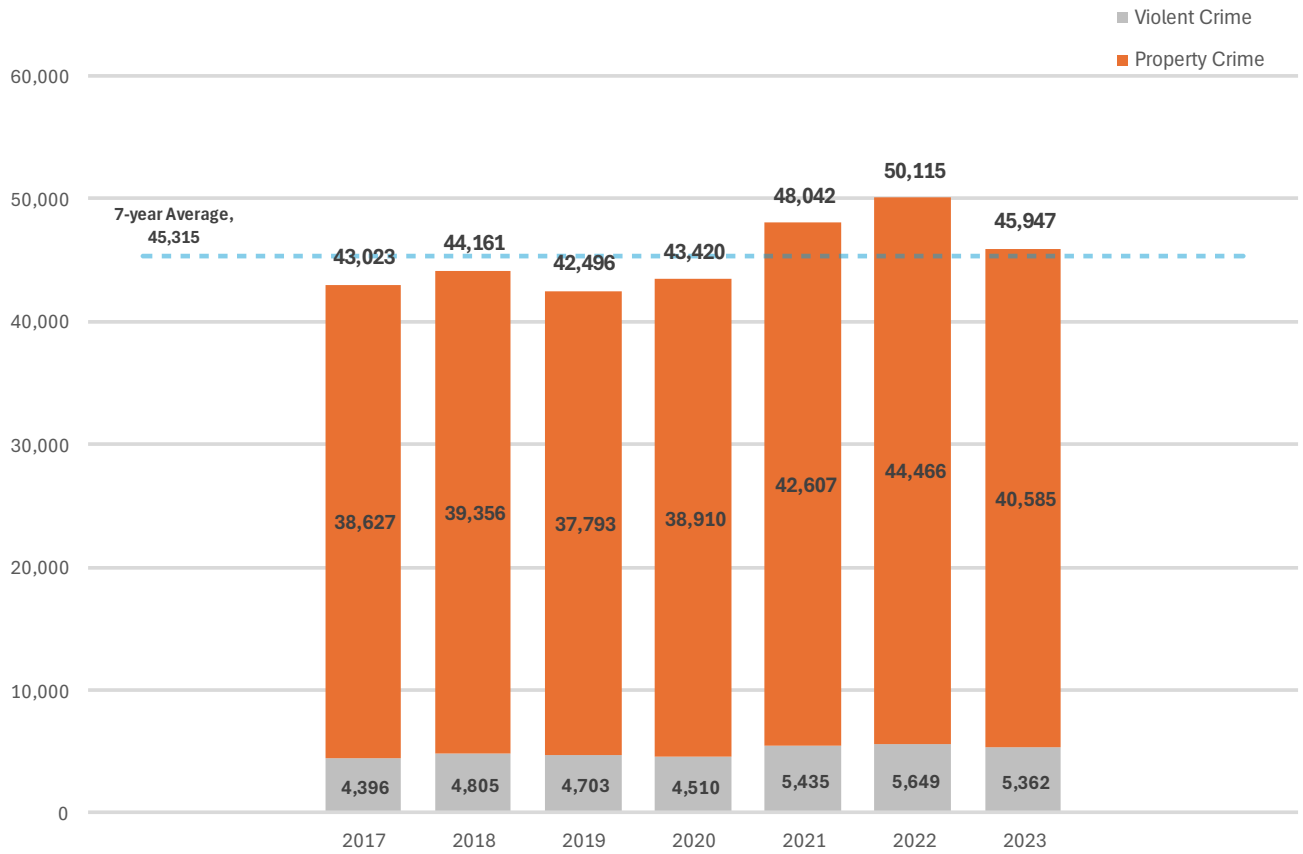
University of Washington Police

This police department has jurisdictional responsibility over the University of Washington Campus and serves as the primary law enforcement and investigative agency. All crime statistics within this jurisdiction are maintained by the University of Washington Police department.

Crime Rates & Service Calls

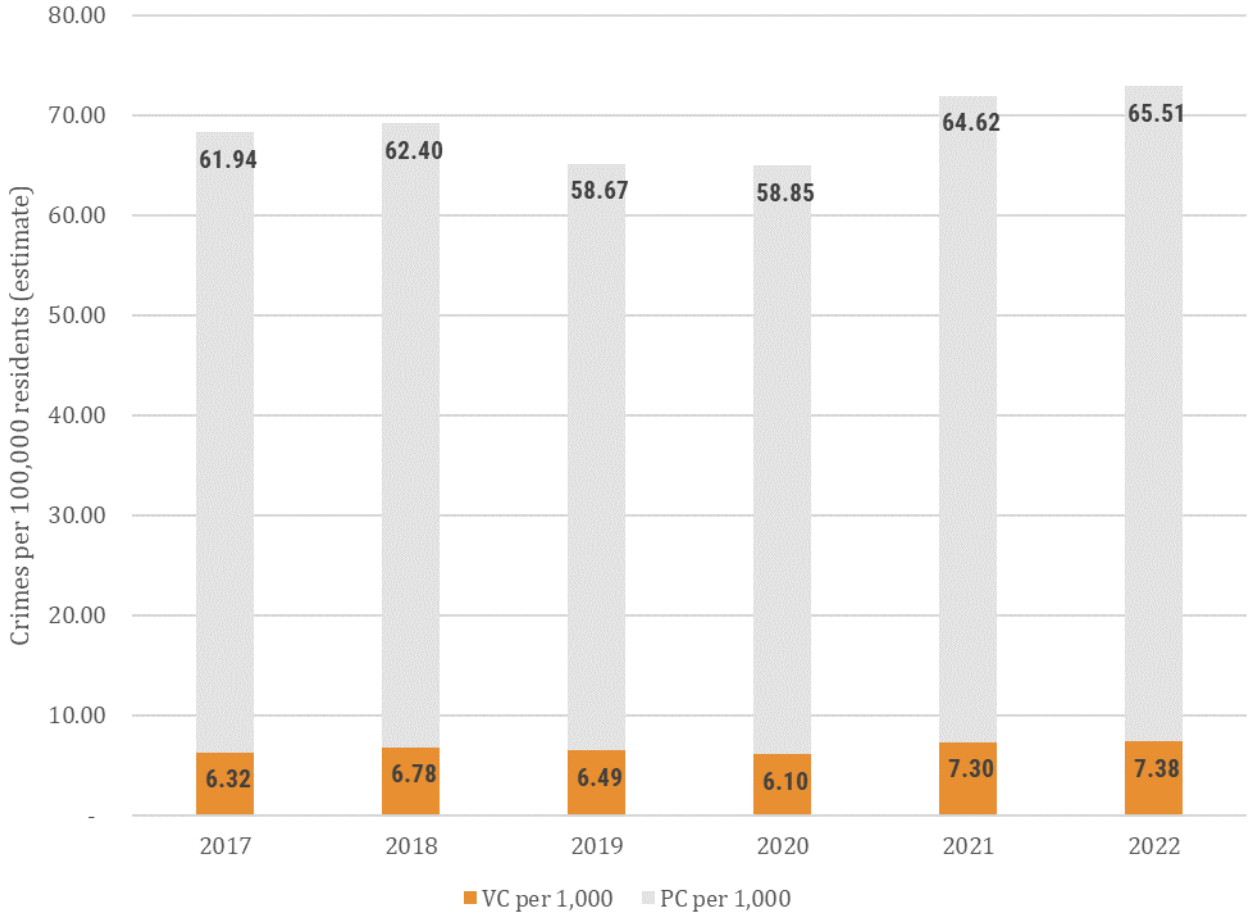
Since 2017, Seattle's crime rate has increased both in aggregate and per capita. In **Exhibit 3.11-4** and **Exhibit 3.11-5** violent crime includes homicide, rape, robbery, and aggravated assault whereas property crime includes burglary larceny and vehicle theft. There was a slight drop in the crime rate in 2019 that has since increased in 2021 and 2022 but dropped back down in 2023 to a level more similar to 2017 – 2020.

Exhibit 3.11-4. Crime Reported, 2017-2023~~2~~



Note: Graph replaced since the Draft EIS to add 2023 and adjust prior year statistics. General order of magnitude is similar.
Sources: Seattle Police Department Crime Dashboard, 2024~~3~~; BERK, 2024~~3~~.

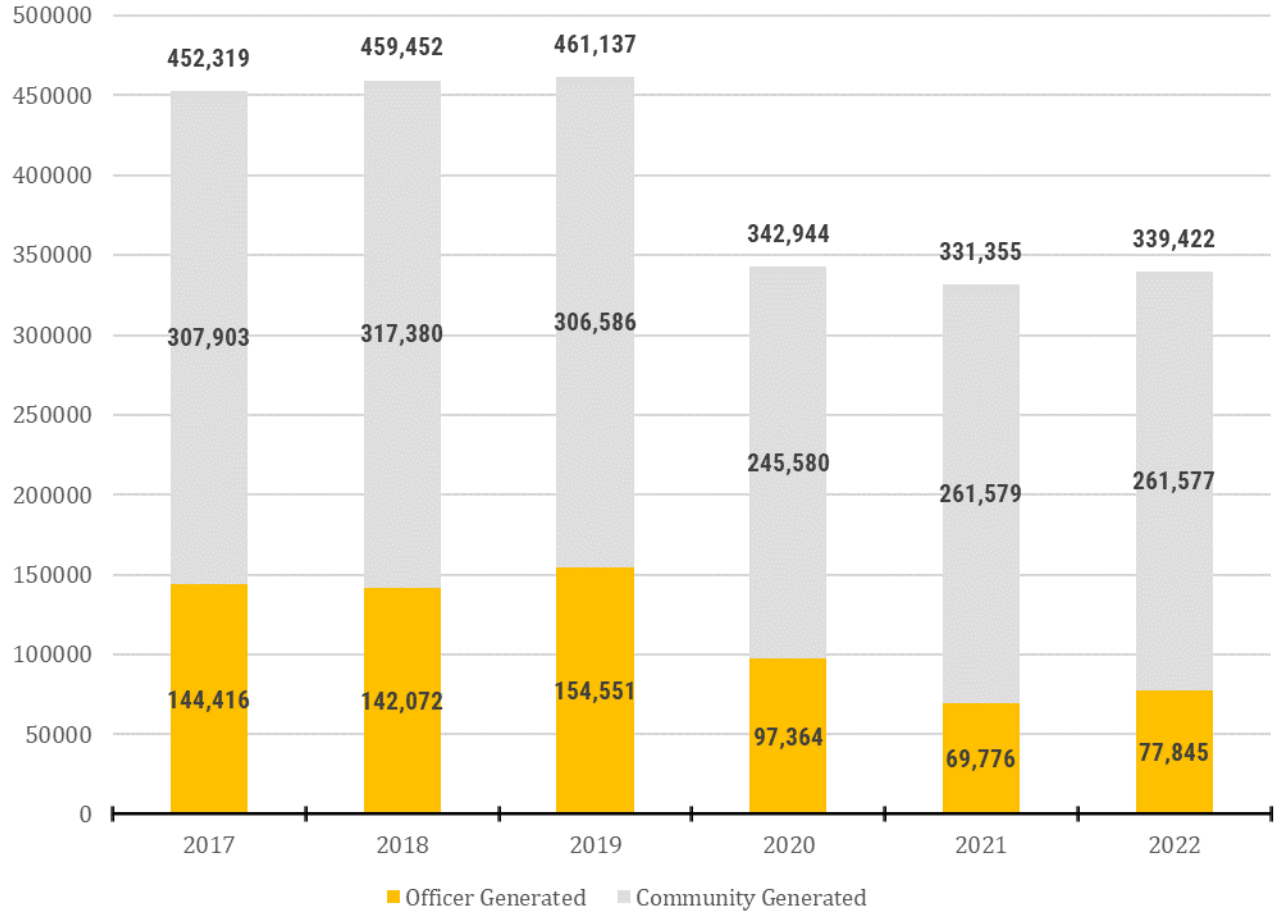
Exhibit 3.11-5. Reported Crime per 1,000 in Population, 2017-2022



Sources: OFM population statistics, 2017-2022; Seattle Police Department Crime Dashboard, 2023; BERK, 2023.

Data from the 2022 Crime Report and the Crime Dashboard show that while the crime rate has increased during this period indicating a positive correlation between population growth and crime rate, the calls for service have gone down significantly during the same period as seen in **Exhibit 3.11-6.**

Exhibit 3.11-6. SPD Citywide Dispatches by Type, 2017-2022

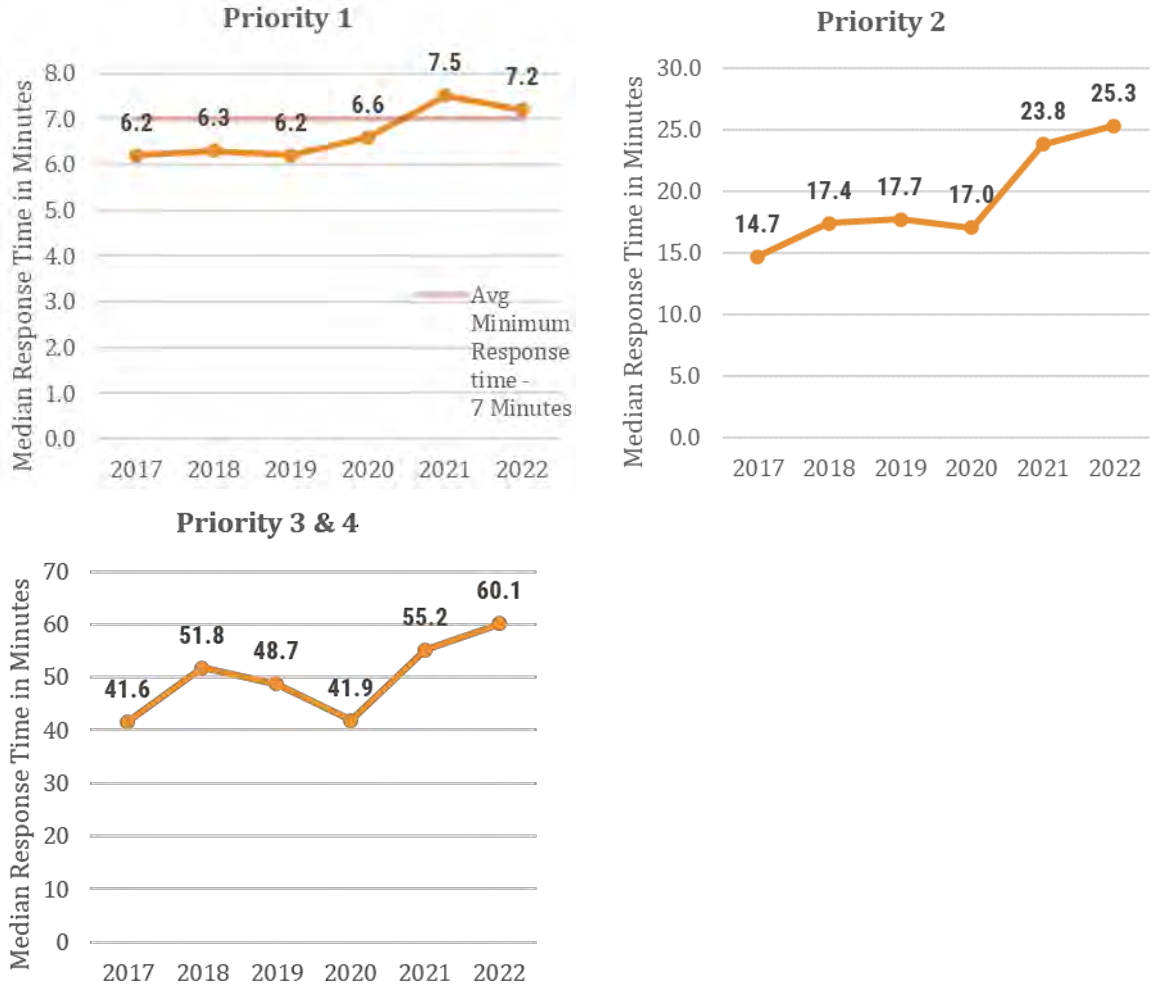


Note: Dispatches that were generated by unknown sources were not counted in this exhibit.
Sources: Seattle Police Computer Aided Dashboard, 2023; BERK, 2023.

Citywide Emergency Response Times

Dispatches are divided into priority 1-4 and the minimum response time level of service is determined by the priority of the call. The response time goal for priority one calls is 7 minutes. SPD has consistently been able to meet or narrowly miss this goal from 2017-2022 as seen in **Exhibit 3.11-7**.

Exhibit 3.11-7. SPD Dispatches and Response Times by Priority, 2017-2022



Source: City of Seattle, 2022; BERK, 2023.

Area Specific

Seattle Police Department is divided into five precincts and each precinct is divided into beats that are patrolled by officers.

Micro-Community Police Plans (MCPP) Priorities

The Seattle Public Safety Survey collects data at the micro-community level about perceptions of crime and public safety, police-community interactions, and knowledge and understanding of the MCPPs. The top five citywide public safety concerns identified in the 2021 survey (in order) were:

1. Police Capacity
2. Property Crime
3. Homelessness
4. Traffic Safety
5. Community and Public Safety Capacity

The top five public safety concerns in each Precinct are listed in **Exhibit 3.11-8**.

Exhibit 3.11-8. Top 5 Safety Concerns by Precinct in Ranked Order, 2021

Precinct	1st	2nd	3rd	4th	5th
East	Police Capacity	Property Crime	Homelessness	Traffic Safety	Community and Public Safety Capacity
North	Police Capacity	Homelessness	Property Crime	Traffic Safety	Community and Public Safety Capacity
South	Police Capacity	Property Crime	Homelessness	Drugs and Alcohol	Community and Public Safety Capacity
Southwest	Police Capacity	Property Crime	Homelessness	Traffic Safety	Community and Public Safety Capacity
West	Police Capacity	Property Crime	Homelessness	Drugs and Alcohol	Community and Public Safety Capacity

Source: Seattle Public Safety, 2021.

Safety concerns are summarized below:

- **East:** Survey respondents in the East Precinct identified the same top five public safety themes as the city. These themes were the same when analyzed at a MCPP level, just in different orders of priority. The Public Safety survey noted that overall, there is less concern

about crime (both day and night) compared to the city and has an overall less favorable view of SPD compared to Nationwide trends.

- **North:** The North Precinct shared similar public safety concerns as the city. However, survey respondents noted drugs and alcohol as a major public safety concern. There is an overall less concern of crime (both day and night) and have a less favorable view of SPD. Looking at MCPPs, Lawlessness was identified as a top theme in Lake City and Homelessness in Fremont, showing some discrepancies in looking at different subareas within the North Precinct.
- **South:** South Precinct Survey responded that Drugs and Alcohol was a higher concern compared to the city than traffic safety. Fear of Crime (both day and night), and perception of SPD, and the police nationwide, is less than the city's average overall. When looking at MCPPs, there were some differences in top public safety concerns. For example, property crime was a top safety concern in SODO.
- **South-West:** Top public safety concerns match city wide themes. The precinct has a higher level of fear of crime (both day and night) and a higher favorable view of SPD and the police nationwide. This is the highest favorable perception of SPD in all the precincts.
- **West:** Survey respondents had similar top public safety themes compared to the city but noted Drugs and Alcohol as a higher priority. The precinct has the highest fear of crime compared to the city and have a high favorable perception of SPD and police nationwide. Violent Crime is also noted as a top priority in the International District when looking at MCPPs.

Staffing & Facilities

SPD's staff is split between its five precincts, headquarters, support facilities, harbor patrol facility, and more. Approximately 514 of the 1,077 commissioned officers are considered precinct staff. See **Exhibit 3.11-9**. Other staff distributions are available in **Exhibit 3.11-9**.

Exhibit 3.11-9. SPD Precinct Staffing as of December 31, 2022

	East		North		South		Southwest		West		Citywide		Total	
	Sargent	Officer	Sargent	Officer	Sargent	Officer	Sargent	Officer	Sargent	Officer	Sargent	Officer	Sargent	Officer
911	11	66	19	116	10	74	8	52	13	107	5	23	66	438
Beats	—	—	—	—	—	—	—	—	1	6	—	—	1	6
Seattle Center	—	—	—	—	—	—	—	—	1	2	—	—	1	2
Total	**11**	**66**	**19**	**116**	**10**	**74**	**8**	**52**	**15**	**115**	**5**	**23**	**514**	

Note: includes phase 3 student officers, personnel who are unavailable due to vacation, training, limited duty, or short-term illness/injury, half time officers, and officers in Acting Sargent assignments. Excludes phase 1 and phase 2 students, detectives, and personnel on extended leave.
Source: SPD, 2023; Socci, 2023

By precinct, the available size and features of each station building is identified below:

A. **North:** The North precinct was built in 1994 and is 16,560 square feet. Currently the department is leasing 5,000 square feet of nearby office space to house additional administrative staff members. It is the base for 135 sworn in officers and 119 additional staff and was designed to accommodate 154 staff. The North Precinct Police station upgrade was put on hold in 2016 to re-address department needs (Seattle, 2018).

B. **West:** The West precinct was built in 1999 and is 46,231 square feet. It is the base for 140 sworn in officers and 82 additional staff and is currently at capacity.[96]

C. **East:** the East precinct was remodeled completely in 1990 and is 31,356 square feet. It is the base for 77 commissioned officers and 107 additional staff and is at capacity.[97]

D. **Southwest:** The Southwest precinct was built in 2002 and is 28,531 square feet. It is the base for 60 sworn in officers and 58 additional staff and was designed to accommodate 131 staff.

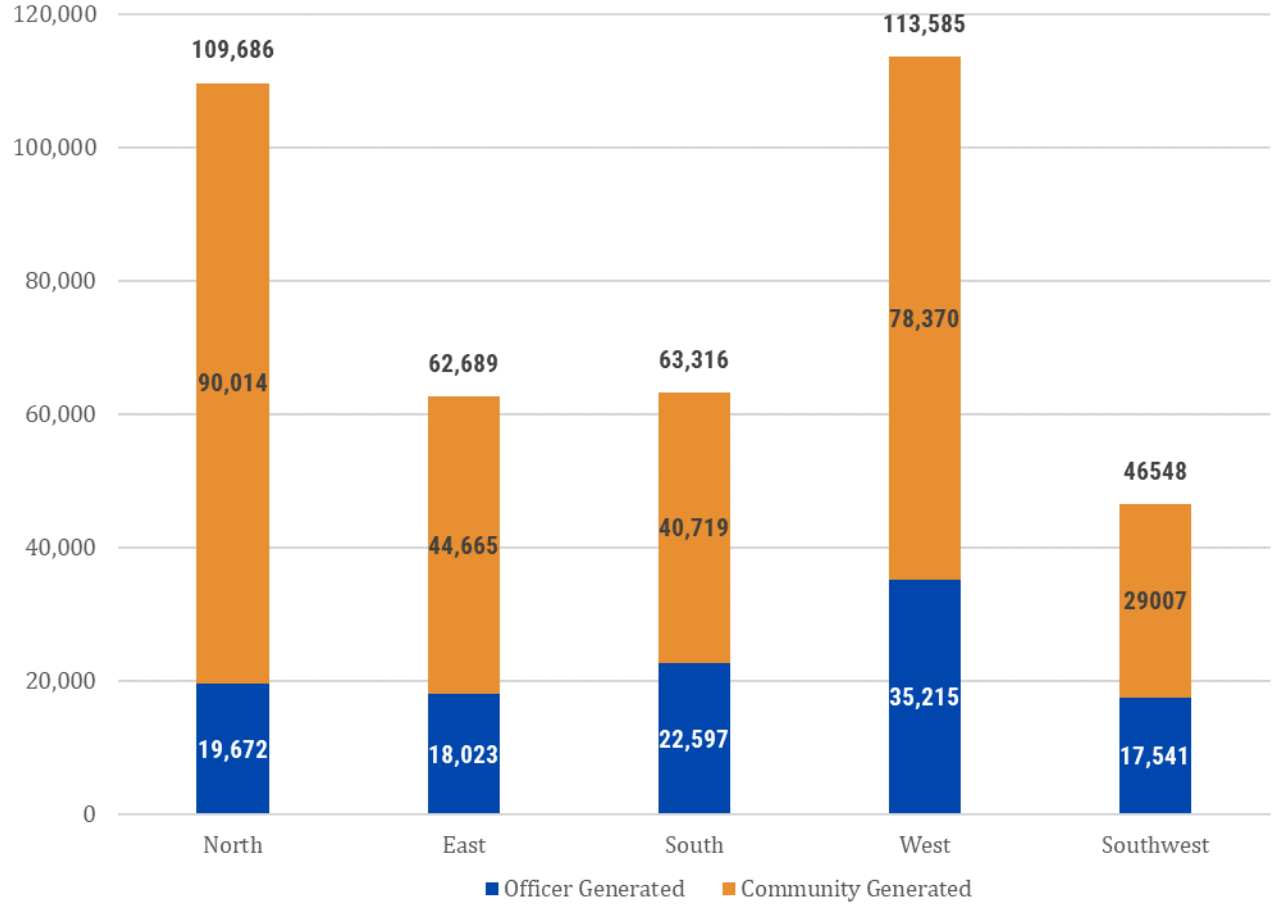
E. **South:** The South precinct was built in 1983 and is 13,700 square feet. It is the base for 84 sworn in officers and 39 additional staff is currently at capacity. The existing facility will require seismic upgrades and renovations to bring the facility up to current standards. Further capacity and staff projection analysis is required.

Precinct Dispatching

Precincts dispatch to officers 911 calls throughout the city and expect officers to respond to possible crimes that they may see on their patrols. The North and West precincts were dispatched the most on average from 2017-2022. These data in **Exhibit 3.11-10** align with citywide data in **Exhibit 3.11-6** to show that most calls are community generated.

[96] Per SPD capacity assessment, design capacity of precinct not available.
[97] Per SPD capacity assessment, design capacity of precinct not available.

Exhibit 3.11-10. Six-year Average (2017-2022) of SPD Dispatches by Type



Source: Seattle Police Computer Aided Dispatch, 2023.

Fire/Emergency Medical Services

Information about fire and emergency medical services was collected from the Seattle Fire Department. SFD's published annual report includes information about the department, incident response trends and response standards, preventative measures taken (e.g., fire code implementation), public events/education, and other notable highlights. Other references include the City of Seattle geolocated call data on its Open Data Portal, SFD's 2012-2017 Strategic Plan, the City's proposed 2023-2024 Budget, and 2023-2028 Capital Improvement Plan. Coordination between EIS authors and SFD personnel knowledgeable about operations and spatial analysis informed this analysis.

Citywide

Level of Service (LOS)

SFD provides fire and rescue response, fire prevention and public education, fire investigation, and emergency medical services (EMS) throughout the city, including the study area. Emergency medical services include basic life support (BLS) and advanced life support (ALS). SFD also has specially trained technical teams that provide technical and heavy rescue, dive rescue, tunnel rescue, marine fire/EMS response, and hazardous materials response. SFD also provides mutual aid response to neighboring jurisdictions.

The 2022 Proposed Budget adds funding to enhance SFD operations in several areas including emergency responses, diversity recruitment, dispatch training, and IT system upgrades. In response to extensive research into community response models and on best practices gleaned from around the country, SFD will add a new specialized triage response program (Seattle City Budget Office 2021, 326).

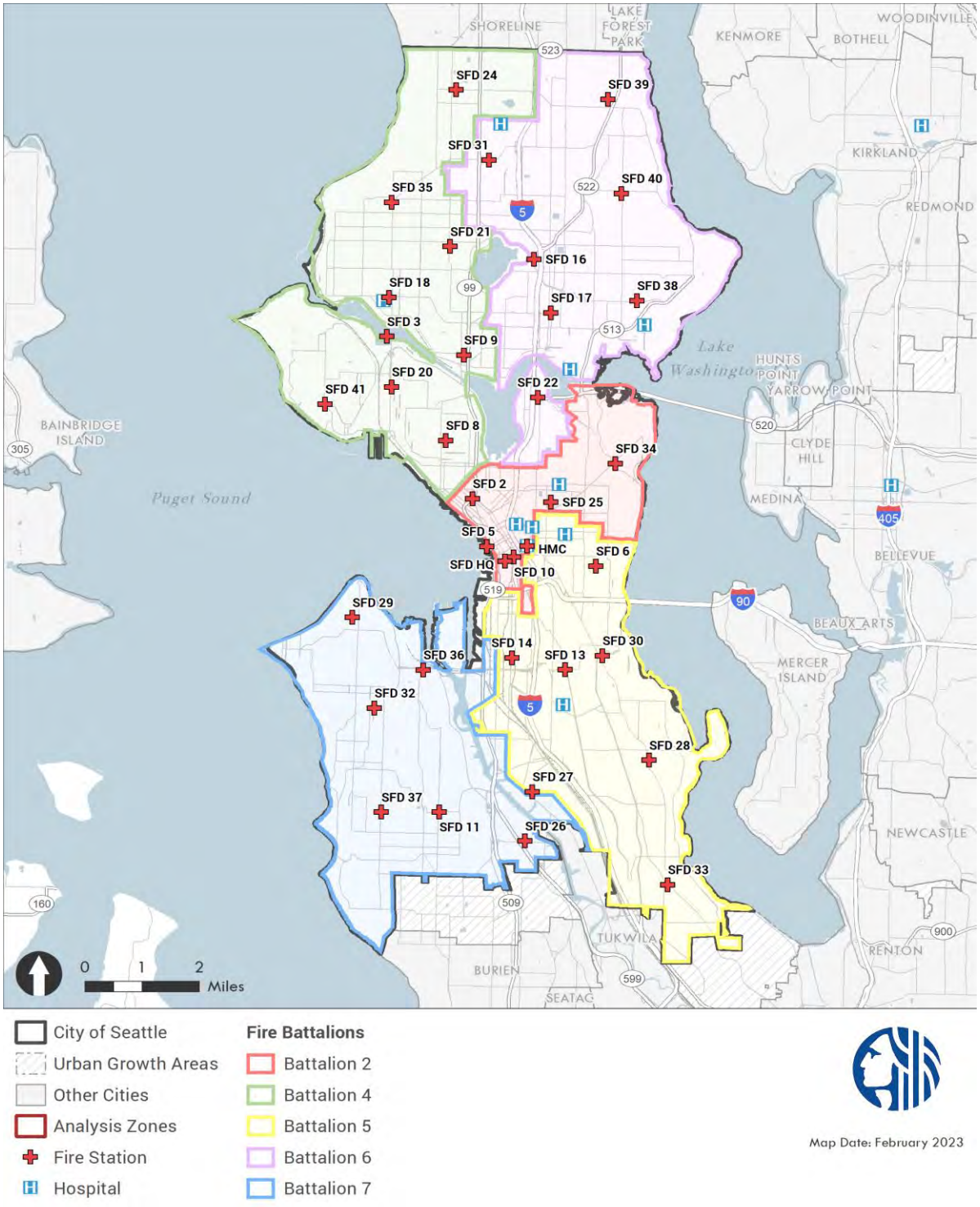
Facilities

SFD provides emergency response services through five battalions consisting of 33 fire stations (plus Battalion 3/Medic One at Harborview Medical Center) strategically placed around the city to maximize coverage and minimize response time. See **Exhibit 3.11-11**. Close up maps of EIS Study Areas and SFD facilities are provided in **Appendix I**.

All SFD stations are staffed 24 hours a day, seven days a week, by four separate shifts of firefighters. There are 216 members responding to emergencies every day across the city (220 with upstaffing for 2 daytime aid cars). In 2021, SFD had 963 uniformed personnel and 81 civilian personnel—uniform personnel include 897 firefighter/EMTs (including chiefs) and 66 firefighter/paramedics (Seattle Fire Department 2021).

These 220 uniformed fire department personnel on the clock 24 hours per day are responsible to provide services for an estimated 391,394 housing units (Seattle Fire 2023). The City also anticipates it will need to replace Station 3 and the Fire Marshal office, acquire, or develop a new facility for SFD Headquarters, replace or expand the commissary and fire garage, develop a fire station in South Lake Union, and develop a freshwater marine fire suppression facility (City of Seattle 2020).

Exhibit 3.11-11. Fire Battalions and Stations



Source: City of Seattle, 2023; BERK, 2023.

Exhibit 3.11-12. SFD Facility Locations and Equipment

Station	Battalion	Equipment	Engine	Ladder	Medic	Fire Boat	Aid
Headquarters	N/A	▪ DEP1 ▪ SAFT2					
Medic One / Harborview Medical Center	N/A	▪ Medic 1 ▪ Medic 10 ▪ Medic 44 ▪ Battalion 3			3		
Fire Station 2—Belltown	2	▪ Engine 2 ▪ Ladder 4 ▪ Aid 2 ▪ Aid 4 ▪ Hose 2	1	1			2
Fire Station 3—Fisherman's Terminal	4	▪ Fireboat Chief Seattle ▪ Fireboat 1*				2	
Fire Station 5—Waterfront	7	▪ Engine 5 ▪ Fireboat 2* ▪ Fireboat Leschi ▪ Rescue Boat 5*	1			2	
Fire Station 6—Central District	5	▪ Engine 6 ▪ Ladder 3	1	1			
Fire Station 8—Queen Anne	4	▪ Engine 8 ▪ Ladder 6	1	1			
Fire Station 9—Fremont	4	▪ Engine 9	1				
Fire Station 10—International District	2	▪ Engine 10 ▪ Ladder 1 ▪ Aid 5 ▪ Aid 10	1	1			2
Fire Station 11—Highland Park	7	▪ Engine 11	1				
Fire Station 13—Beacon Hill	5	▪ Engine 13 ▪ Battalion 5	1				
Fire Station 14—SoDo	5	▪ Aid 14 ▪ Rescue 1 (DECON1 & REHAB1) ▪ Ladder 7**		1			1
Fire Station 16—Green Lake	6	▪ Engine 16	1				
Fire Station 17—University District	6	▪ Engine 17 ▪ Ladder 9 ▪ Medic 17 ▪ Battalion 6	1	1	1		
Fire Station 18—Ballard	4	▪ Engine 18 ▪ Ladder 8 ▪ Medic 18 ▪ Battalion 4 ▪ Hose 18*	1	1	1		
Fire Station 20—West Queen Anne	4	▪ Engine 20	1				

Station	Battalion	Equipment	Engine	Ladder	Medic	Fire Boat	Aid
Fire Station 21—Greenwood	4	▪ Engine 21	1				
Fire Station 22—Roanoke	6	▪ Engine 22	1				
Fire Station 24—Bitter Lake	4	▪ Engine 24 ▪ Air 240	1				
Fire Station 25—Capitol Hill	2	▪ Engine 25 ▪ Ladder 10 ▪ Aid 25 ▪ Battalion 2	1	1			1
Fire Station—26—South Park	7	▪ Engine 26 ▪ Medic 26	1		1		
Fire Station 27—Georgetown	7	▪ Engine 27	1				
Fire Station 28—Rainier Valley	5	▪ Engine 28 ▪ Ladder 12 ▪ Medic 28	1	1	1		
Fire Station 29—Admiral District	7	▪ Engine 29	1				
Fire Station 30—Mount Baker	5	▪ Engine 30 ▪ Air 9	1				
Fire Station 31—Northgate (Interim)	6	▪ Engine 31 ▪ Ladder 5 ▪ Medic 31 ▪ Aid 31	1	1	1		1
Fire Station 32—West Seattle Junction	7	▪ Engine 32 ▪ Ladder 11 ▪ Medic 32 ▪ Battalion 7	1	1	1		
Fire Station 33—Rainier Beach	5	▪ Engine 33	1				
Fire Station 34—Madison Park	2	▪ Engine 34 ▪ Hose 34*	1				
Fire Station 35—Crown Hill	4	▪ Engine 35	1				
Fire Station 36—Delridge & Harbor Island	7	▪ Engine 36	1			1	
Fire Station 37—West Seattle & High Point	7	▪ Engine 37 ▪ Ladder 13	1	1			
Fire Station 38—Hawthorne Hills	6	▪ Engine 38	1				
Fire Station 39—Lake City	6	▪ Engine 39	1				
Fire Station 40—Wedgwood	6	▪ Engine 40	1				
Fire Station 41—Magnolia	4	▪ Engine 41	1				
Totals			**32**	**12**	**9*** **	**5**	**7**** **

* Not listed in 2022 annual report and identified on Seattle Fire Web Page
** Part of Rescue 1 Unit
*** Includes Health 1and added Medic Unit at Station 26
**** Two of seven are "Peak-Time Aid Units."
Source: Seattle Fire 2022 Annual Report, Seattle.gov/fire.

Incident Response Trends

Between 2017 and 2021 total incident responses decreased from 96,822 to 93,233. As shown in **Exhibit 3.11-13**, the number of total responses remained relatively constant in 2017 and 2018, then decreased in 2019 and 2020. The COVID-19 pandemic drove a decrease in EMS calls in 2020—a trend SFD believes resulted from fewer people being outside their homes coupled with a fear of being exposed to the virus—and a rise in fire responses. However, both EMS and fire incident calls increased from 2020 to 2021. Total incident responses increased 16% from 2020-2021 and an additional 12.5% between 2021 and 2022.

Exhibit 3.11-13. Seattle Fire Department Emergency Response Incidents

Year	EMS Incidents: BLS and ALS	Fire and Specialty Incidents*	Other and Mutual Aid**	Total
2017	78,758 (81.3%)	16,548 (17.1%)	1,111 (1.1%)	96,822
2018	76,484 (80.7%)	17,080 (18.0%)	1,128 (1.2%)	94,780
2019	72,980 (79.6%)	18,088 (19.7%)	648 (0.7%)	91,716
2020	61,717 (76.8%)	18,094 (22.5%)	505 (0.6%)	80,316
2021	74,302 (79.7%)	24,616 (26.4%)	53 (0.1%)	93,233
2022	78,808 (74.0%)	27,587 (25.9%)	58 (.05%)	106,453

* "Special Incidents" responses were previously included in "Fire" in 2019 and 2020 but were separated in 2021
** For 2021 "other responses" transitioned to "mutual aid" responses.
Sources: SFD Live and SFD 2019 & 2022 Annual Report.

Response Time

Maintaining or improving emergency response times is the core of Seattle Fire Department operations (Seattle Fire Department, 2012). SFD's response standards specify the minimum criteria needed to deliver fire suppression, special operations response, and emergency medical services (Seattle Fire Department 2020) effectively and efficiently. The Capital Facilities Appendix of Seattle 2035 establishes the following response time standards for the Department (City of Seattle 2020, 529-530):

A. Call Processing Time: 60 seconds for phone answered to first unit assigned for 90% of calls.
B. Fire Response Time: Arrival within 4 minutes for first-arriving engine at a fire for 90% of calls, and arrival within 8 minutes of the full first alarm assignment of 15 firefighters, for 90% of calls.
C. Basic Life Support: Arrival within 4 minutes of the first medical unit with two EMTs, for 90% of calls.
D. Advanced Life Support: Arrival within 8 minutes for 90% of call

Exhibit 3.11-14 shows the statistics the Department uses to measure response time performance. These statistics generally correspond with the Department's response time standards.

Between 2016 and 2020 the Department fell short of meeting its response time standards, with the exception of meeting its call processing time standard in 2018 and its full first alarm assignment standard from 2018-2022. Call processing has also decreased significantly in 2022 to 60%.

Exhibit 3.11-14. Response Statistics, 2017-2022

Year	Call Processing Time within 60 seconds	First Arriving Engine at Fire within 4 Minutes	Full Fire Alarm Assignment at Fire within 8 Minutes	Fire Arriving Unit for a BLS Incident within 4 Minutes	Fire Arriving Unit for an ALS Incident within 8 minutes
Adopted Standard	90%	90%	90%	90%	90%
2017	84%	77%	71%	79%	89%
2018	**92%**	76%	**93%**	79%	86%
2019	64%	75%	**94%**	76%	86%
2020	66%	78%	**92%**	73%	81%
2021	59%	75%	**91%**	73%	81%
2022	60%	76%	**95%**	75%	82%

Sources: Seattle Fire Department Annual Report, 2019, 2021, and 2022; BERK, 2023.

Area Specific

The 2023-2024 proposed operating budget includes a $2.2-million expenditure for 30 additional firefighting recruits, $303,102 for paramedic recruits in 2023, $606,203 for paramedic recruits in 2024. These additional recruit positions are on top of the 60 firefighting recruit positions and 5 paramedic recruit positions that are part of the base budget. The goal of these additional positions is to alleviate vacancies from attrition and retirement within the department.

These recruit positions are not reflected in the current FTE levels by Battalion in **Exhibit 3.11-15**. Other expenditures for fire prevention are increasing from 11.5 million in 2022 to a proposed 11.7 and 11.85 million in 2023 and 2024 respectively.

Exhibit 3.11-15. SFD Staffing and Expenditures Budget by Battalion

Battalion	FTE & Expenditures 2021	FTE & Expenditures 2022	FTE & Expenditures 2023 (proposed)	FTE & Expenditures 2024 (proposed)	Minimum Staff Per Shift (estimate)	Minimum staff for four shifts (estimate)
2	205.45 $28,015,684	205.45 $32,635,307	205.45 $32,309,457	205.45 $32,893,487	42	168
3	82.00 $15,476,222	82.00 $17,419,528	82.00 $17,360,397	82.00 $17,665,117	12	48
4	199.45 $29,591,593	199.45 $33,261,878	199.45 $34,272,162	199.45 $34,883,293	48	192
5	185.45 $28,465,652	185.45 $31,605,322	185.45 $32,044,188	185.45 $32,584,561	44	176
6	169.45 $26,641,698	169.45 $28,850,602	169.45 $29,158,278	169.45 $29,641,374	46	184
7	148.45 $26,619,359	148.45 $25,663,613	148.45 $25,625,945	148.45 $26,028,047	52	208

Source: Seattle Finance Department 2023-2024 proposed budget https://www.seattle.gov/city-budget-office/budget-archives/2023-2024-proposed-budget.

The Battalion staffing levels combined with information received from Seattle Fire about minimum staffing levels for each fire apparatus per shift are also available in **Exhibit 3.11-15**.

This data highlights potential opportunities for shifts in staff resources as well as current estimated staffing needs in each of the battalions. Battalion 6 and 7 are currently running at lower staff than their fire units can support. Battalion 7 Supports the Downtown Waterfront Station 5, South Park, Georgetown, as well as all five stations on the West Seattle peninsula. Battalion 6 supports the entire Northeast quadrant of the city ranging from the Roanoke Station in Eastlake up through Lake City and including the University of Washington and Greenlake.

Both of these Battalions' stations have at least one engine but as is consistent across the city there are far fewer fire units to support emergency medical staff and aid units which make up nearly 70% of dispatches to SFD (Haskell, McAuslan, 2023). These minimum staffing estimates are based on the types of units at each station and were provided by Seattle Fire. Engines & Ladders require four operators per run; Medic Units, Aid Units, and other special apparatuses require between two & four operators per run depending on the unit. Please note that two was used to form the basis of this estimate. (Haskell, McAuslan, 2023).

The subareas for analysis maps are found in **Chapter 2** and are the basis for the growth estimates for each different growth alternative. The subareas align partially with some battalions but do not overlap exactly. The subarea analysis highlights the current levels of service for households within them. ~~**Section 3.12.2, Section 3.11.3,** and **Section 3.11.4** provide additional context for each subarea and the different proposed growth alternatives that will impact public services such as Fire, Police, and Parks.~~

Area 1

Northwest Seattle's seven fire stations service an estimated 79,576 housing units, both the highest number of stations and housing units in Seattle. Each station has an engine and additional units are mostly supported by Station 26 in Ballard that houses specialized apparatuses such as a ladder unit, a medic unit, one of Seattle's two hose and foam units. The Greenwood Station houses Seattle's mass casualty incident unit which has only been dispatched 87 times since data collection began in 2004. The Bitter Lake station houses one of Seattle's two air units. Area 1 also includes Station 31 at Northgate which is currently operating from an interim station until a new station is built. The new station is still currently in the design phase (City of Seattle 2022-2027 Adopted CIP). See **Exhibit 3.11-16** for stations, equipment, staffing, and ratios of fire units to dwelling units.

Exhibit 3.11-16. Stations and Fire Units in Area 1

Stations	Engines (4 Staff Per shift)	Ladders (4 Staff Per Shift)	Medic (2 Staff Per Shift)	Aid (2 Staff Per Shift)	Other Apparatus (~2 Staff Per Shift)
9, 16, 18, 21, 24, 31, 35	7	2	2	1	3
Required Minimum staff per shift	28	8	4	2	6
Housing units per fire unit	11,368	39,788	39,788	79,576	26,525

Sources: Seattle Fire Department Annual Report, 2022; Seattle 2035 Capital Facilities Appendix, 2020; BERK 2023.

Area 2

Northeast Seattle contains four fire stations with one engine per station as well as four other fire and EMS units. The University District Station houses the Battalion 6 vehicle as well as the one medic unit in this subarea. The most notable shortcoming of this subarea's fire station capacity is that it does not have a dedicated aid unit. There are 64,581 households in the service area so aid units and engines from elsewhere in the city respond to these emergencies. This shortcoming may increase response times and decrease service level standards. See **Exhibit 3.11-17** for stations, equipment, staffing, and ratios of fire units to dwelling units.

Exhibit 3.11-17. Stations and Fire Units in Area 2

Stations	Engines (4 Staff Per shift)	Ladders (4 Staff Per Shift)	Medic (2 Staff Per Shift)	Aid (2 Staff Per Shift)	Other Apparatus (~2 Staff Per Shift)
17, 38, 39, 40	4	2	1	0	1
Required Minimum staff per shift	16	8	2	0	2
Housing units per fire unit	16,145	32,290.5	64,581	—	64,581

Sources: Seattle Fire Department Annual Report, 2022; Seattle 2035 Capital Facilities Appendix, 2020; BERK, 2023.

130th/145th Station Area

The 130th and 145th Station Area is in Area 2, and between SFD Stations 24, 31 and 39. These stations' units include two engines, one ladder, and one air unit. Growth in the station areas could increase demand. Currently there are 2,376 housing units in the direct station area.

Exhibit 3.11-18. 130th/145th Station Area Fire Stations, Units and Minimum Required Staff

Stations	Engines (4 Staff Per shift)	Ladders (4 Staff Per Shift)	Medic (2 Staff Per Shift)	Aid (2 Staff Per Shift)	Other Apparatus (~2 Staff Per Shift)
24, 39	2	1	0	0	1
Required Minimum staff per shift	8	4	0	0	2
Fire units per 1000 housing units	.1	.03	.03	0	.05
Housing units per fire unit	1,188	2,376	—	—	2,376

Sources: Seattle Fire Department Annual Report, 2022; Seattle 2035 Capital Facilities Appendix, 2020; BERK, 2023.

Area 3

Area 3 includes Queen Anne, Magnolia, and part of Ballard's business district. The four stations within this subarea do not have any medic units or aid units and are therefore highly dependent on utilizing fire specific units and personnel for aid and medic calls or on stations elsewhere in the city. There are 36,514 housing units in this area. A large percentage of Area 3 is dedicated to non-housing uses such as commercial, industrial, and parks land. SFD staff has identified the topography of this subarea combined with the lack of more nimble fire and aid apparatuses as limiting factors on response times and levels of service (Haskell, McAuslan, 2023). Station 3 at Fisherman's Terminal houses Fire Boat Chief Seattle as well as Fireboat 1 that are dispatched to marine fires on the freshwater side of the Ballard's Hiram M. Chittenden Locks. See **Exhibit 3.11-19** for stations, equipment, and staffing.

Exhibit 3.11-19. Stations and Fire Units in Area 3

Stations	Engines (4 Staff Per shift)	Ladders (4 Staff Per Shift)	Medic (2 Staff Per Shift)	Aid (2 Staff Per Shift)	Other Apparatus (~2 Staff Per Shift)
3, 8, 20, 41	3	1	0	0	2
Required Minimum staff per shift	12	4	0	0	2
Housing units per fire unit	12,171	36,514	—	—	18,257

Sources: Seattle Fire Department Annual Report, 2022; Seattle 2035 Capital Facilities Appendix, 2020; BERK, 2023.

Area 4

Downtown Seattle has three fire stations as well as Seattle Fire Headquarters. Station 5 is home to two fire boats and a rescue boat that are dispatched to offshore emergencies within Puget

Sound. The stations also have the highest number of aid units with two full-time and two peak hour units. There are no medical units within this subarea but Medic One is located at Harborview Hospital and can easily be dispatched to Area 4. Seattle Fire Headquarters is also home to the Health One program. Health One is an integrated health response unit that can respond to physical or mental health crises and provides social services to those in distress. This unit is staffed by two firefighters and social workers and includes three truck units.

Most of the land area is dedicated to major institutions, commercial properties, and multifamily dwellings. The estimated 51,611 multifamily housing units that make up this area have much stricter fire codes than the estimated 451 single family homes and typically require more aid dispatches than fire dispatches. See **Exhibit 3.11-20** for stations, equipment, and staffing.

Exhibit 3.11-20. Stations and Fire Units in Area 4

Stations	Engines (4 Staff Per shift)	Ladders (4 Staff Per Shift)	Medic (2 Staff Per Shift)	Aid (2 Staff Per Shift)	Other Apparatus (~2 Staff Per Shift; 3 for Health One*)
2, 5, 10, Headquarters	3	2	0	4	6
Required Minimum staff per shift	12	8	0	8	15
Housing units per fire unit	17,354	26,031	—	13,015.5	8,677

*Health one is only staffed Monday-Friday during daytime hours rather than the traditional four shift schedule.
Sources: Seattle Fire Department Annual Report, 2022; Seattle 2035 Capital Facilities Appendix, 2020; BERK, 2023.

Area 5

The central east study area has four fire stations as well as Medic One based in the Harborview Medical Center on First Hill. This area is 64% residential by area with an estimated 12,445 single family units and 57,725 multifamily units. Medic One houses the Battalion 3 vehicle as well as three medic units. The area's aid unit as well as the Battalion 2 vehicle are based at Capitol Hill Station. There is also the SFD Communications Van based at Roanoke Station and the HOSE34 hose and foam unit at Madison Park Station. See **Exhibit 3.11-21** for stations, equipment, staffing, and ratios of fire units to dwelling units.

Exhibit 3.11-21. Stations and Fire Units in Area 5

Stations	Engines (4 Staff Per shift)	Ladders (4 Staff Per Shift)	Medic (2 Staff Per Shift)	Aid (2 Staff Per Shift)	Other Apparatus (~2 Staff Per Shift)
6, 22, 25, 34, MED ONE	4	2	3	1	3
Required Minimum staff per shift	16	8	6	2	6
Housing units per fire unit	17,543	35,085	23,390	70,170	23,390

Source: Seattle Fire Department Annual Report, 2022; Seattle 2035 Capital Facilities Appendix, 2020; BERK, 2023.

Area 6

The West Seattle study area contains four stations serving an estimated 21,595 multi-family housing units and 24,905 single-family units. This subarea is also the second largest by acreage and has no aid units. Like in other subareas and station areas, existing units have been operating outside of the intended use in order to meet SFD's level of service standard and response time standard. These stations have benefited from the additional units being relocated within and near the study area. One Ladder unit was placed at West Seattle Station and a medic unit was placed in Area 7 to serve the West Seattle Bridge Closure. Both movements were originally temporary but were later made permanent by Seattle City Council. See **Exhibit 3.11-22** for stations, equipment, staffing, and ratios of fire units to dwelling units.

Exhibit 3.11-22. Stations and Fire Units in Area 6

Stations	Engines (4 Staff Per shift)	Ladders (4 Staff Per Shift)	Medic (2 Staff Per Shift)	Aid (2 Staff Per Shift)	Other Apparatus (~2 Staff Per Shift)
11, 29, 32, 37	4	2	1	0	1
Required Minimum staff per shift	16	8	2	0	2
Housing units per fire unit	11,625	23,250	46,500	—	46,500

Source: Seattle Fire Department Annual Report, 2022; Seattle 2035 Capital Facilities Appendix, 2020; BERK, 2023.

Area 7

The Greater Duwamish MIC, Georgetown, and South areas are supported by four fire stations in South Park, SoDo, Delridge/Harbor Island, and Georgetown. See **Exhibit 3.11-23**. This is a predominantly industrial area with unique apparatuses to support industrial uses. Examples include SFDs Rescue One Technical Rescue Team which include DECON1 and REHAB1 apparatuses. An additional medic unit was moved to Station 26 in South Park in response to the West Seattle Bridge closure and now permanently supports the ~2,287 dwellings in the area.

Exhibit 3.11-23. Stations and Fire Units in Area 7

Stations	Engines (4 Staff Per shift)	Ladders (4 Staff Per Shift)	Medic (2 Staff Per Shift)	Aid (2 Staff Per Shift)	Other Apparatus (~2 Staff Per Shift)
14, 26, 27, 36	3	1	1	1	2
Required Minimum staff per shift	12	4	2	2	4
Housing units per fire unit*	762	2,287	2,287	2,287	1,143.5

Source: Seattle Fire Department Annual Report, 2022; Seattle 2035 Capital Facilities Appendix, 2020; BERK, 2023.
* Note: this is a predominantly industrial area and its units reflect the needs of industrial firefighting rather than residential firefighting needs—additional assessment of unit needs in **Exhibit 3.11-40**.

Area 8

The Southeast Seattle Subarea is serviced by four fire units and runs from I-90 to Rainier Beach East of I-5. These fire units service about 22,183 single family units and 17,521 multifamily units. This subarea takes up most of the land area within Fire Battalion 5 jurisdiction and none of the four stations have an aid car. The Mount Baker Station does house one of SFDs AIR units to provide supplemental breathing equipment for fire calls and Station 28 in the Rainier Valley houses Medic28 which provides life support dispatches.

Exhibit 3.11-24. Stations and Fire Units in Area 8

Stations	Engines (4 Staff Per shift)	Ladders (4 Staff Per Shift)	Medic (2 Staff Per Shift)	Aid (2 Staff Per Shift)	Other Apparatus (~2 Staff Per Shift)
13, 28, 30, 33	4	1	1	0	2
Required Minimum staff per shift	12	4	2	0	4
Housing units per fire unit	9,926	39,704	39,704	—	19,852

Source: Seattle Fire Department Annual Report, 2022; Seattle 2035 Capital Facilities Appendix, 2020; BERK, 2023.

Parks

Information about open space and recreation was collected from Seattle Parks and Recreation (SPR) and the Seattle Parks District. Plans and studies referenced include system wide plans particularly those that guide the location and use of parks, trails, and centers serving the broader public:

- Seattle Parks and Recreation Strategic Plan (2020),
- Seattle Parks and Recreation 2022-2024 Action Plan (2022),
- Parks and Open Space Plan (POS) (2017),
- Seattle Shoreline Master Program (2015),

Seattle Comprehensive Plan (2015). These plans set levels of service offered to Seattle community members today and in the long term. The City is in the process of updating its POS Plan by 2024 in parallel with the One Seattle Plan Update.

Planning Framework

This section summarizes the policies and strategies of the City's plans that guide the provision of facilities and access to parks and shorelines.

Parks & Recreation Strategic Plan (2020)

The strategic plan sets a direction for the 12 year period 2020-2032, recognizing the rapid resident and employment growth of the 2015-2020 period and lack of equity. The vision and key strategies are under five key elements:

- **Pathway to Equity:** Seattle Parks and Recreation envisions programs, policies, and funding that create equitable outcomes, as well as strategies and actions that show measurable results toward our vision of healthy people, a healthy environment, and strong communities.
  - Steps to equity include: (1) developing an equity and engagement plan to implement equity goals, (2 and 6) developing an equity scorecard and map for resource allocation and planning and department performance, (3) revamping Race and Social Justice Initiative Outcomes, (4) training Seattle Parks and Recreation staff on pathway to equity, (5) conducting robust and culturally responsive engagement.
- **Healthy People:** Healthy people are active and moving around, feel safe and welcomed in public spaces across the city, have access to affordable, fresh food, and practice healthy habits that prevent disease and enhance physical and mental well-being.
  - In summary, nine implementing strategies address: (1) access to parks and recreation to all ages, (2) universal design, (3) quality spaces and facilities, (4) information about health and activity, (5) accessible public space and/or high quality recreation programs within a 10-minute walk of all residents, (6) increasing connection to nature for underserved communities, (7) improving equity in design and placement of community centers, (8) provide multifunctional spaces, and (9) increasing resilience of urban food system and access to fresh food.
- **Healthy Environment:** Seattle becomes a national leader in mitigating climate change impacts, stewarding and protecting our urban forests and natural spaces, promoting environmental responsibility and environmental justice, and building resilient infrastructure.
  - Ten strategies include in summary: (1) managing water resources through conservation and landscaping, (2) reducing waste, (3) creating a carbon-neutral park system, (4) develop new target for urban forest goal, (5) preserve parkland and open space, (6) providing a year-round system to respond to extreme climate events (heat, smoke), (7) improving connectivity, (8) increase alternative energy and technologies, (9) program and events for natural environment appreciation, (10) acquire land responsibly focusing on urban centers and underserved areas.
- **Strong Communities:** A strong Seattle community affords universal access to housing, living-wage jobs, education, and safe spaces to congregate and forge social connections. Children have support for success in school and in life, adults have access to employment and economic opportunity, and all ages feel part of a connected, vibrant city.
  - Eleven strategies include: (1) extended academic enrichment opportunities, (2) support childcare and programming, (3) increase free programming and streamline registration, (4) level grant programs and build capacity in underserved areas, (5) improve safety at

parks, (6) address homelessness through parks-based job-training and respectful cleaning of unsanctioned encampments, (7) bringing people together at events, (8) increase communication and outreach about programs, (9) reexamine partnerships and strengthen volunteer programs, (10) enhance economic opportunities through apprenticeships and green economy employment, and (11) increase cleanliness and safety of public restrooms.

- **Organizational Excellence:** The City of Seattle is managed by a world-class local government with a high-quality, well-trained workforce that operates with a focus on excellence and professionalism, collaborates with community and partners, equitably delivers essential services, adapts to changing best practices, and embraces new technology and innovative ideas.
  - In summary, the ten strategies: (1) develop and implement an equity strategy, (2) seek national accreditation, (3) have an appropriately sized workforce, (4) invest in training, (5) update systems and technology, (6) have ongoing engagement of vulnerable populations, (7) advance innovation, (8) collaborate with public and private partners to address livability, affordability, homelessness, and the environment, (9) address preventative maintenance, and (10) have a new structure to advisory committees and maximize engagement opportunities.

Seattle Parks & Recreation 2022-2024 Action Plan

After a pivot to pandemic response in 2020, in 2021 Seattle Parks and Recreation sought to engage with communities and develop short-term budget and priorities and operational goals. This action planning work focused on addressing four parallel crises within the city and to Seattle Parks and Recreation services:

- Public Health and Well Being
- Racial Equity
- Economic Recovery
- Impacts of Climate Change

The actions and goals identified within the 2022-2024 Action Plan highlight how Seattle Parks and Recreation intends to ~~move~~ address each of the immediate crises above by making specific progress on the five key elements identified in the Park & Recreation Strategic Plan.

Parks Open Space (POS) Plan (~~2017~~2024)

The City of Seattle POS Plan (~~2017~~2024) includes five major goals:

- **Goal 1:** Provide a variety of outdoor and indoor spaces throughout the city for all people to play, learn, contemplate, and build community.
- **Goal 2:** Continue to provide opportunities for all people across Seattle to participate in a variety of recreational activities.
- **Goal 3:** Manage the city's park and recreation facilities to provide safe and welcoming places.

- **Goal 4:** Plan and maintain Seattle's parks and facilities to ~~accommodate~~ attract additional park users and visitors.
- **Goal 5:** Engage with community members ~~on parks and recreation plans, and~~to design and develop parks and facilities, that are based on the specific needs and cultures of the communities that the park is intended to serve.

Shoreline Master Program Public Access

The Comprehensive Plan includes shoreline access goals and policies that are considered part of the Shoreline Master Program. Selected goals and policies addressing shoreline access include a general goal to maximize physical and visual access, enhancing views, and promoting street ends.

> *LUG44 Maximize public access—both physical and visual—to Seattle's shorelines.*
>
> *LUG45 Preserve and enhance views of the shoreline and water from upland areas, where appropriate.*
>
> *LU238 Maintain standards and criteria for providing public access, except for lots developed for single-family residences, to achieve the following:*
>
> *1. linkages between shoreline public facilities via trails, paths, etc., that connect boating and other recreational facilities.*
> *2. visible signage at all publicly owned or controlled shorelines and all required public access on private property.*
> *3. development of bonuses or incentives for the development of public access on private property, if appropriate.*
> *4. provision of public access opportunities by public agencies such as the City, Port of Seattle, King County and the State at new shoreline facilities and encourage these agencies to provide similar opportunities in existing facilities.*
> *5. view and visual access from upland and waterfront lots.*
> *6. prioritize the operating requirements of water-dependent uses over preservation of views.*
> *7. protection and enhancement of views by limiting view blockage caused by off-premise signs and other signs.*
>
> *LU240 Shoreline street ends are a valuable resource for public use, access and shoreline restoration. Design public or private use or development of street ends to enhance, rather than reduce, public access and to restore the ecological conditions of the shoreline transportation in the shoreline.*

Level of Service (LOS)

The City of Seattle sets level of service (LOS) standards for open space and recreation across the City. The Seattle 2035 Comprehensive Plan states in policy P 1.2 "Provide a variety of parks and open space to serve the city's growing population consistent with the priorities and level-of-service standards identified in the City's Park Development Plan" now called the Parks and Open Space Plan (Seattle Parks and Recreation 2017).

The 2017 Parks and Open Space Plan includes level-of-service standard of 8 acres per 1,000 residents (Seattle Parks and Recreation 2017) which is no longer in effect as of May 2024. The assumption of 8 acres of park and recreation facilities per 1,000 residents is used ~~throughout this impacts analysis to~~to compare population demand for open space and recreation. See **Exhibit 3.11-25**. Seattle Parks and Recreation ~~has initiated a process to~~ updated and adopted a new Parks and Open Space Plan ~~by~~ in ~~March~~ May 2024. This update considers changes to the level-of-service standard. The 2024 Parks and Open Space Plan Update proposes to change the Level of Service (LOS) from an acres per 1,000 people standard to providing parks and park facilities within a 10-minute walk.

Exhibit 3.11-25. Seattle's Projected Population to Acres of City-owned Parkland Comparison

Year	Seattle's Population	Acres of Parkland (2017)	Acres/1,000 residents
2016	686,800	6,414 acres	9.34 acres/1,000 residents
2023	731,012 (projected)*	6,414 acres**	8.77 acres/1,000 residents
2035	806,800 (projected)*	6,454 acres (minimum)	8.00 acres/1,000 residents

Notes: *Assumption is that Seattle's population will increase by approximately 6,316 individuals annually.
** This model assumes parkland levels stay at the current acreage for comparison purposes. As noted below land acquisition is often opportunity driven, however SPR anticipates the acquisition of additional parkland before 2023 based on its prior history of acquisition and ongoing negotiating on several properties. The 2024 Parks and Open Space Plan update shows 6,478 acres as of 2024.
Source: Seattle POS Plan, 2017.

The POS plan also identified a long-term acquisition strategy for natural areas, and parks in a 5-minute walk in urban centers and areas outside urban centers with a 10-minute walk. See **Exhibit 3.11-26**.

Exhibit 3.11-26. Long-Term Acquisition Strategy

Strategy	Locations	
5-minute Walkability—Within Urban Centers	Aurora-Licton Springs	North Beacon Hill
	Bitter Lake	Columbia City
	Northgate	Othello
	Ballard	Rainier Beach
	First Hill	South Park
	Fremont	West Seattle Junction
	12th Avenue	Morgan Junction
	North Rainier	Westwood-Highland Park
Natural Area/Greenbelt Acquisition	200 + prioritized properties	
10-minute Walkability Outside Urban Centers Underserved	Georgetown neighborhood and Bitter Lake/Aurora area	

Source: Seattle POS Plan, 2017 and 2024.

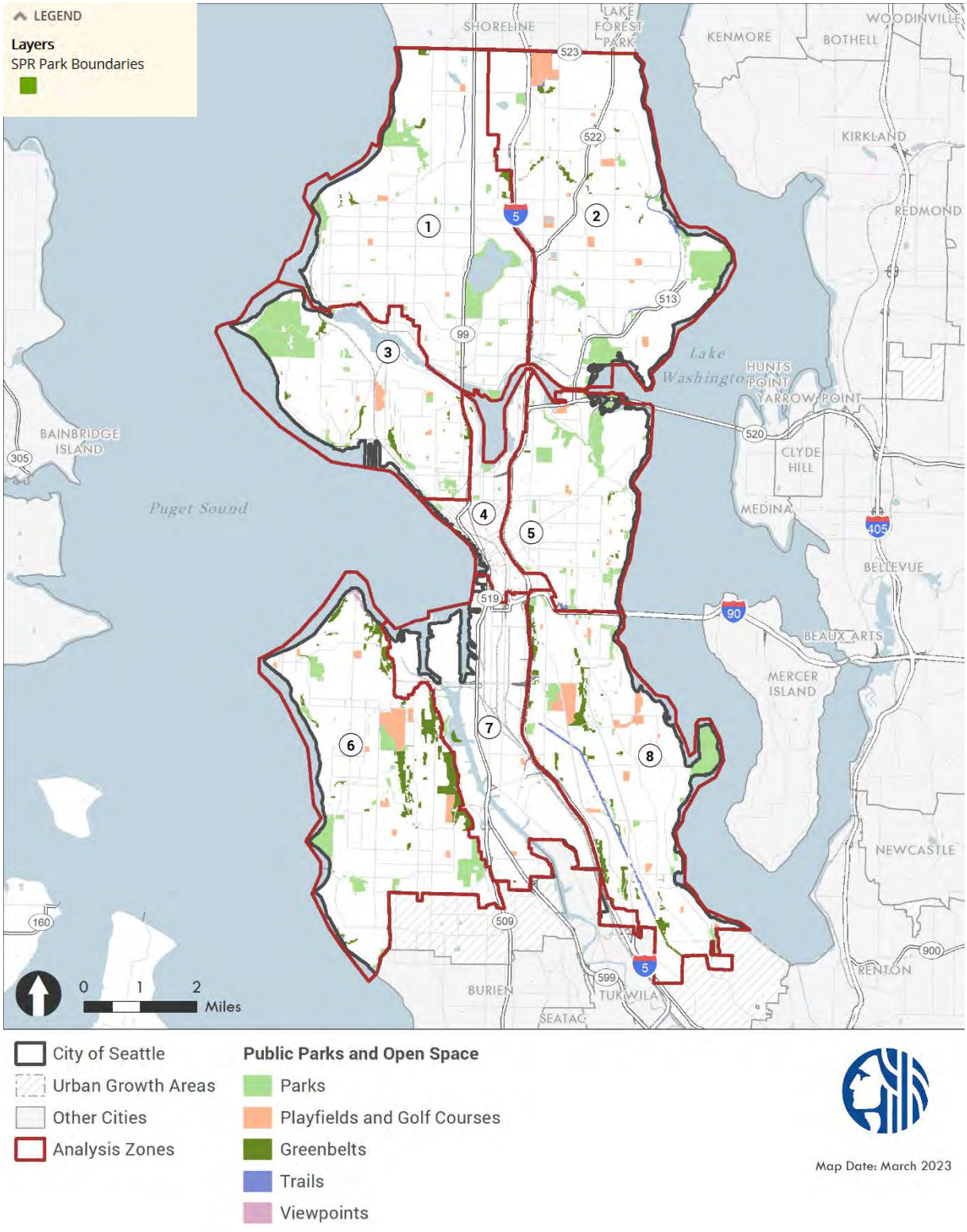
Current Conditions

Citywide

Seattle Parks and Recreation (SPR) manages a 6,478-acre park system with over 485 parks and natural areas. This system includes athletic fields, play areas, gardens, trails, facilities and community centers, swimming pools, education centers, golf course, and skateparks. The SPR system comprises about 12% of Seattle's land area.

The study area, the subareas, and the parks and recreation facilities available are identified in the map below (see **Exhibit 3.11-27**).

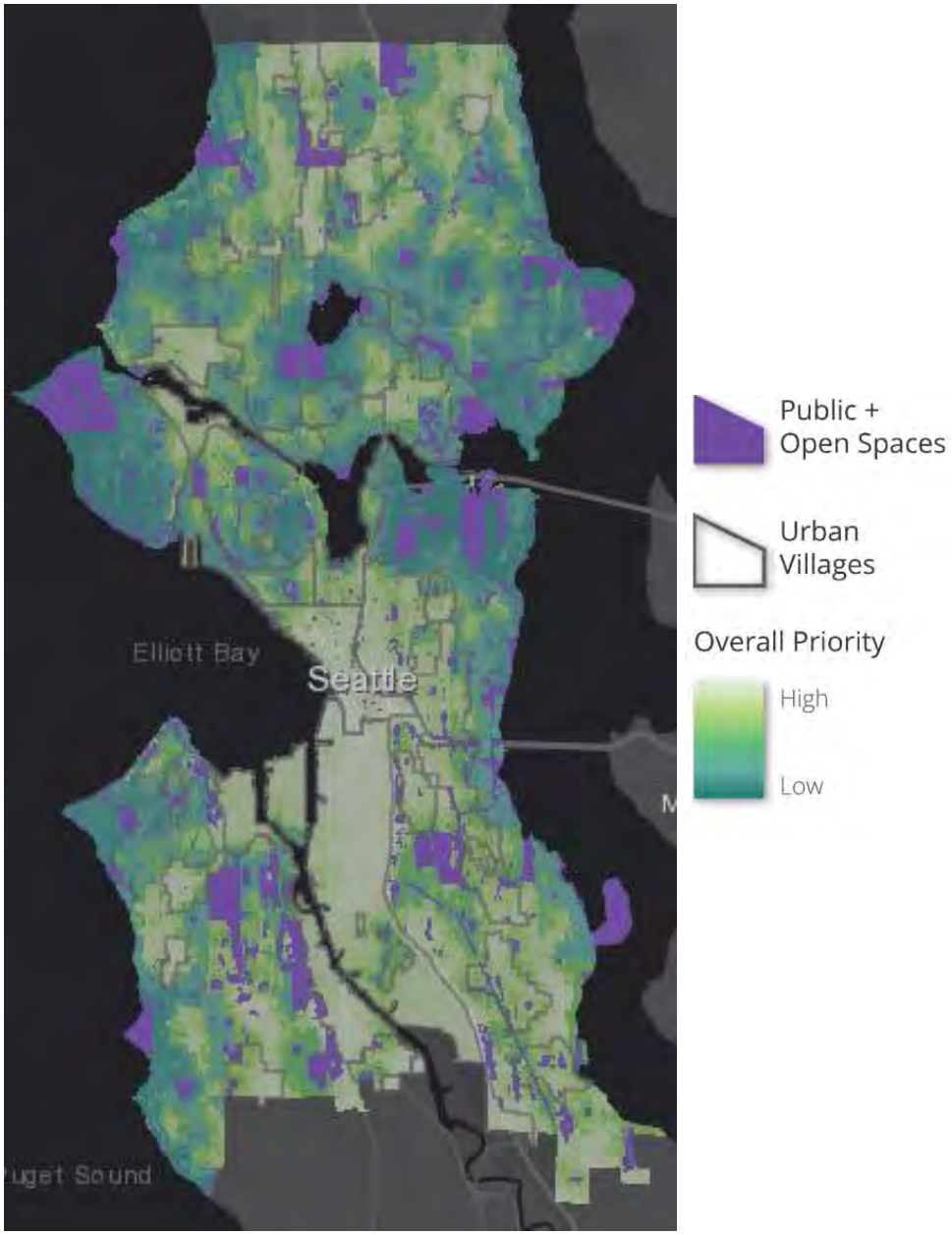
Exhibit 3.11-27. City and Study Area Parks and Recreation Facilities



Sources: Seattle POS Plan, 2017; BERK, 2023.

In 2020, OPCD developed an "Outside Citywide" map tool considering access to open spaces at city, county, state, and federal governments, special districts like schools and the Port, and other private space. Based on race and social equity, density and growth, and health outcomes, the City identified priority areas for public space provision. See **Exhibit 3.11-28**. Areas with poor access include many of those referenced in **Exhibit 3.11-26**. More notably, Ballard, Greenwood-Phinney Ridge, Aurora-Licton Springs, Lake City, Northgate, and Morgan Junction. The Greater Duwamish Manufacturing and Industrial Center (MIC) is also an area lacking parks and open space.

Exhibit 3.11-28. Outside Citywide Access—Public Space Priority Areas



Source: Seattle Parks and Recreation, 2020.

Analysis Areas

Maps of parkland by area are included in **Appendix I**. A summary of key park features by analysis area is provided below.

Area 1: NW Seattle

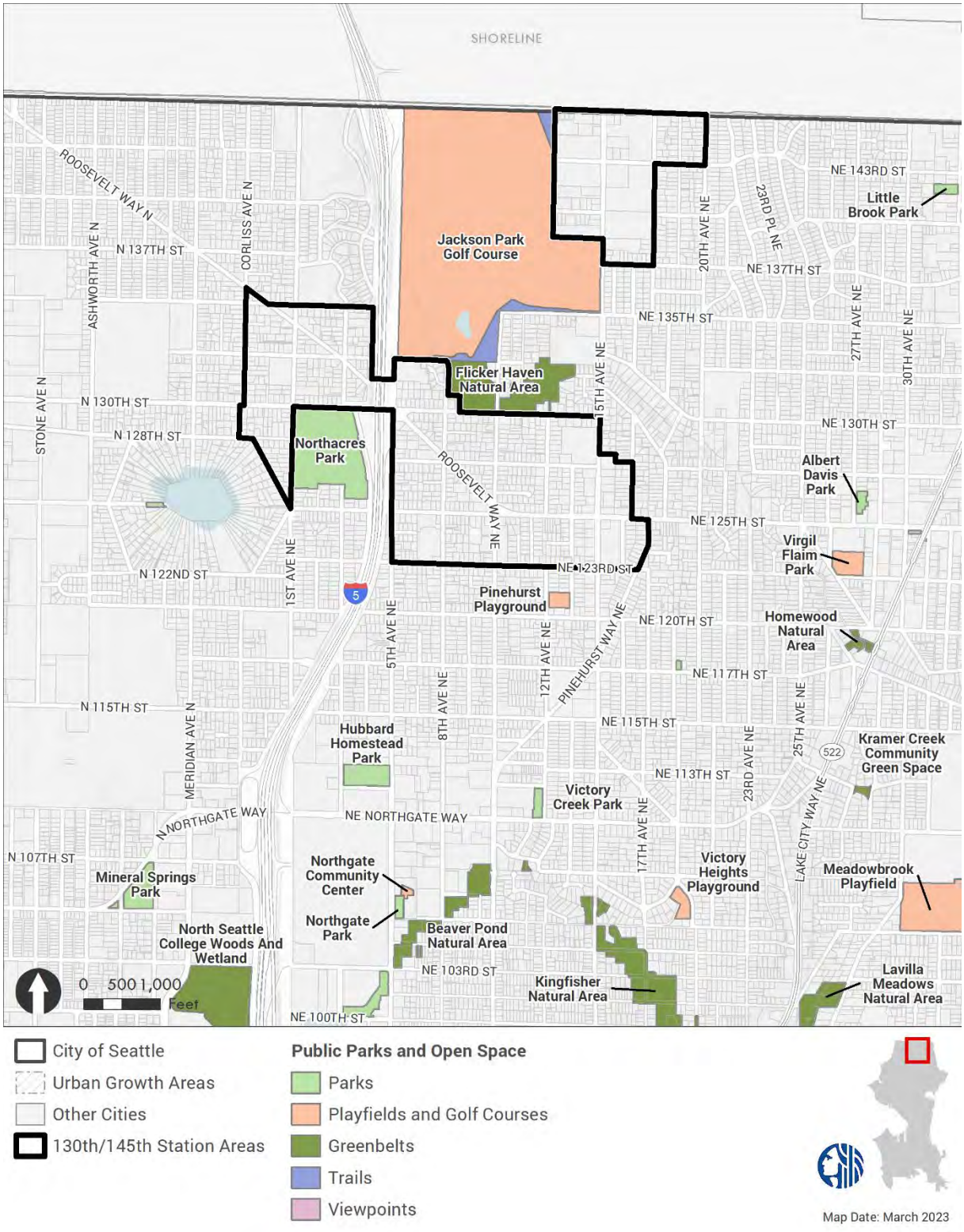
Major open spaces in Area 1 include: Carkeek and Golden Gardens along Puget Sound, as well as Greenlake and Woodland Park Zoo, Gas Works Parks as well as the Shilshole Bay Marina (Port of Seattle).

Area 2: NE Seattle

Major parks and open space in Area 2 include Jackson Park Golf Course, Warren G. Magnuson Park, the University of Washington east campus which includes a golf driving range, intramural fields and the Union Bay Natural Area, Ravenna Park, Maple Leaf Reservoir Park, Northeast Sports Complex—Nathan Hale High School (Seattle Public Schools), and others. Priority areas for public space include Northgate, Lake City, and NE 45th Street west of the University of Washington campus.

130th/145th Station Area. In the 130th/145th Station Area, the largest park and open space is Jackson Park Golf Course & Trail. Other parks in the area include Northacres Park, Licorice Fern Natural Area, Pinehurst Playground, Virgil Flaim Park, Albert Davis Park, Haller Lake Street End Park, Northwest Sports Complex (Ingraham High School—Seattle Public Schools) and others such as the North Seattle College Barton Woods wetland and campus landscape. The Evergreen Washelli Cemetery (private) is also located west of this area providing open space. Several P-Patches provide fresh food access and open space. See **Exhibit 3.11-29**.

Exhibit 3.11-29. 130th/145th Station Study Area Parks and Open Spaces



Source: City of Seattle 130th & 145th Street Station Area Background Report, 2021; BERK, 2023.

Area 3: Queen Anne/Magnolia

Area 3 includes Discovery Park, Interbay Golf Course and Athletic Field, West Seattle Playfield and Community Center, Myrtle Edwards Park, Magnolia Boulevard, Queen Anne Boulevard, Kinnear Park, David Rodgers Park, and Centennial Park (Port of Seattle). Priority areas for parks include the BINMIC area and some parts of the Uptown Urban Center.

Area 4: Downtown/Lake Union

Area 4 contains Lake Union Park, Denny Park, Cascade Playground, Olympic Sculpture Park, Victor Steinbrueck Park, Waterfront Park, City Hall Park, Hing Hay Park, Danny Woo Garden and Kobe Terrace, Occidental Square, various public plazas, Memorial Stadium (Seattle Public Schools) and Port of Seattle piers. Most of the Downtown Urban Center is an area of priority public space needs.

Area 5: Capitol Hill/Central District

Area 5 includes Washington Park and Arboretum, Interlaken Park, Volunteer Park, Cal Anderson Park, Garfield Playfield, Madrona Park, Leschi Park, Frink Park, Sam Smith Park, Judkins Park and Playfield, and Judge Charles M. Stokes Overlook, East Duwamish Greenbelt, among other small neighborhood parks. The west side of the First Hill/Capitol Hill Urban Center and part of the Madison-Miller and 23rd & Union-Jackson Urban Centers have areas less well served by parks; see **Exhibit 3.11-27**.

Area 6: West Seattle

Area 6 includes Lincoln Park, Alki Beach Park, Hamilton Viewpoint Park, Don Armeni Park, Schmitz Preserve Park, Alki Playground, West Seattle Golf Course, Camp Long, Me-Kwa-Mooks Park, Riverview Playfield, Westcrest Park, Roxhill Park, Southwest Athletic Complex (Seattle Chief Sealth International High School—Seattle Public Schools), Fauntleroy Park, Seola Park, and several natural areas and greenbelts along creeks and hillsides. The West Seattle Junction, Morgan Junction, and Westwood Highland Park are areas that could benefit from additional parks and open space.

Area 7: Duwamish

The Greater Duwamish MIC, Georgetown, and South Park areas in Area 7 have some shoreline access on Port of Seattle property and as well as parks, playfields and greenbelts such as Georgetown Playfield, Ruby Chow Park, Georgetown Urban Farm and Forest, South Park Playground, South Park Meadow, and Marra-Desimone Park. The South Park Urban Center and much of the MIC is considered a priority for public space.

Area 8: SE Seattle

Area 8 includes parks along the Lake Washington shoreline like Colman Park, Seward Park, Martha Washington Park, Pritchard Island Beach, as well as parks within the central residential area like Jefferson Park, Jefferson Golf Course, Maplewood Playfield, Chief Sealth Trail (Seattle City Light), Van Asselt Playground, Kubota Gardens, Lakeridge Park, Southeast Sports Complex (Rainier Beach High School—Seattle Public Schools) and other greenbelts. Priority locations for public access include areas abutting I-5 and Rainier Avenue South, as well as portions of the Mt. Baker/North Rainier, North Beacon Hill, Columbia City, Othello, and Rainier Beach Urban Centers.

Schools

The information about schools was collected from:

- Seattle Public Schools
- Seattle Preschool Program
- Washington Office of Superintendent of Public Instruction
- King County Assessor Parcel Records

Planning Framework

Seattle 2035

Seattle's Comprehensive Plan includes several goals related to education, including:

- ***Capital Investments & Schools:***

  CF 5.3 Partner with Seattle Public Schools to plan for expected growth in student population, explore opportunities to reduce the costs of developing new schools, encourage the siting of new school facilities in or near urban centers and villages, and make it easy for students and families to walk and bike to school.

  AC 4.4 Encourage the adaptive reuse of historic community structures, such as meeting halls, schools, and religious buildings, for uses that continue their role as neighborhood centers.

  AC 4.6 Encourage partnerships to use public and institutional spaces, such as parks, community centers, libraries, hospitals, schools, universities, and City-owned places, for arts, musicians, and culture.

  CW 4.6 Work with schools, higher education institutions, libraries, community centers, and arts and cultural agencies and organizations to link services into a seamless system that helps students stay in school, such as through collocation of services and joint use of facilities.

  CW 7.8 Encourage use of existing facilities and collocation of services, including joint use of schools and City and community facilities, to make services available in underserved areas and in Uran Center areas.

LU G3 Allow public facilities and small institutions to locate where they are generally compatible with the function, character, and scale of an area, even if some deviation from certain regulations is necessary.

- ***Access to Education, Recreation, & Cultural Access:***

  CW 4.1 Create equitable access to high-quality early-learning services, and support families so that their children are prepared for school.

  CW 4.9 Work with colleges, universities, other institutions of higher learning, and community-based organizations to promote lifelong learning opportunities and encourage the broadest possible access to libraries, community centers, schools, and other existing facilities throughout the city.

  CW 4.10 Work with schools, libraries, and other educational institutions, community-based organizations, businesses, labor unions, and other governments to develop strong educational and training programs that provide pathways to successful employment.

  AC G3 Improve access to arts and music education in all schools and outside the school setting so that students are prepared to be successful in school and life.

  P 1.9 Use cooperative agreements with Seattle Public Schools and other public agencies to provide access to open spaces they control.

  H 1.4 Remove barriers that prevent lower-income households from using rental assistance throughout Seattle, particularly in areas with frequent transit, schools, parks, and other amenities.

130th/145th Station Area Plan

The 130th/145th Station Area Plan includes several strategies related to education and schools:

Strategy 3.2 Consider partnerships to expand public access to private recreational facilities and gathering spaces associated with schools and faith communities.

Strategy 8.3 Connect key community destinations like parks, schools, and businesses with multimodal improvements to enhance neighborhood circulation.

Strategy 11.4 Share information with Seattle Public Schools about affordable housing developments to promote and market affordable housing to eligible families within the service area of local schools.

Current Conditions

Citywide

The Seattle School District serves the city as a whole with 103 schools, including:

- 63 Elementary Schools
- 10 K-8 Schools

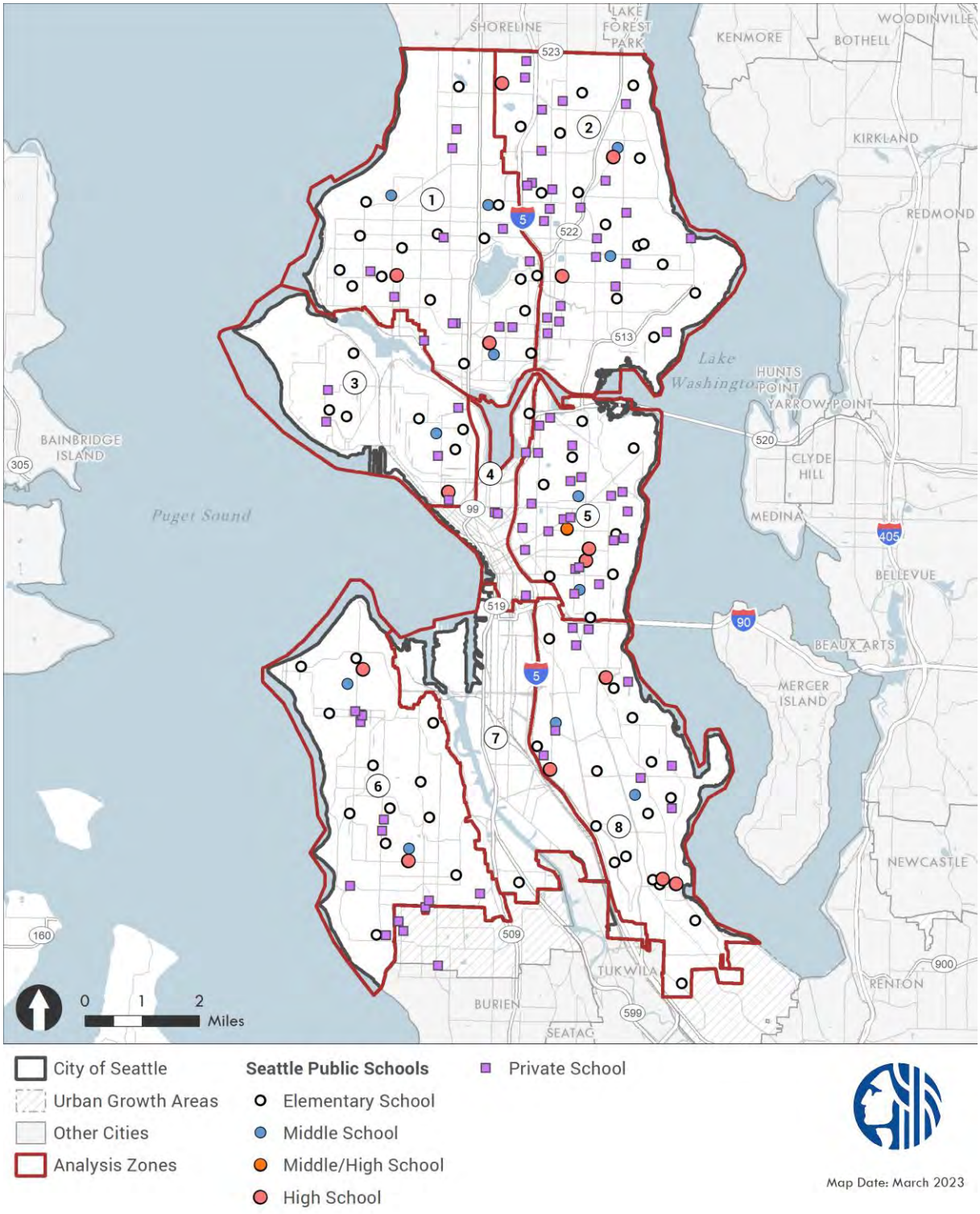
- 12 Middle Schools
- 18 High Schools (including Middle College, Interagency, South Lake, and Skills Center)

The Seattle School District employs 5,955 educators at school sites. There are currently about 23,691 elementary, 11,001 middle, and 15,364 high school students enrolled. The students are 46% white and 54% persons of color. The top languages spoken other than English include Spanish, Somali, Vietnamese, Chinese (Cantonese), Amharic, Oromo, Tigrinya, Chinese (Mandarin), Japanese, and Arabic (Seattle Public Schools 2022). The Seattle School District Administrative offices are in Area 7. Seattle Public Schools also hosts many pre-k programs in their facilities.

Private schools include secular and religious schools, found in every analysis area.

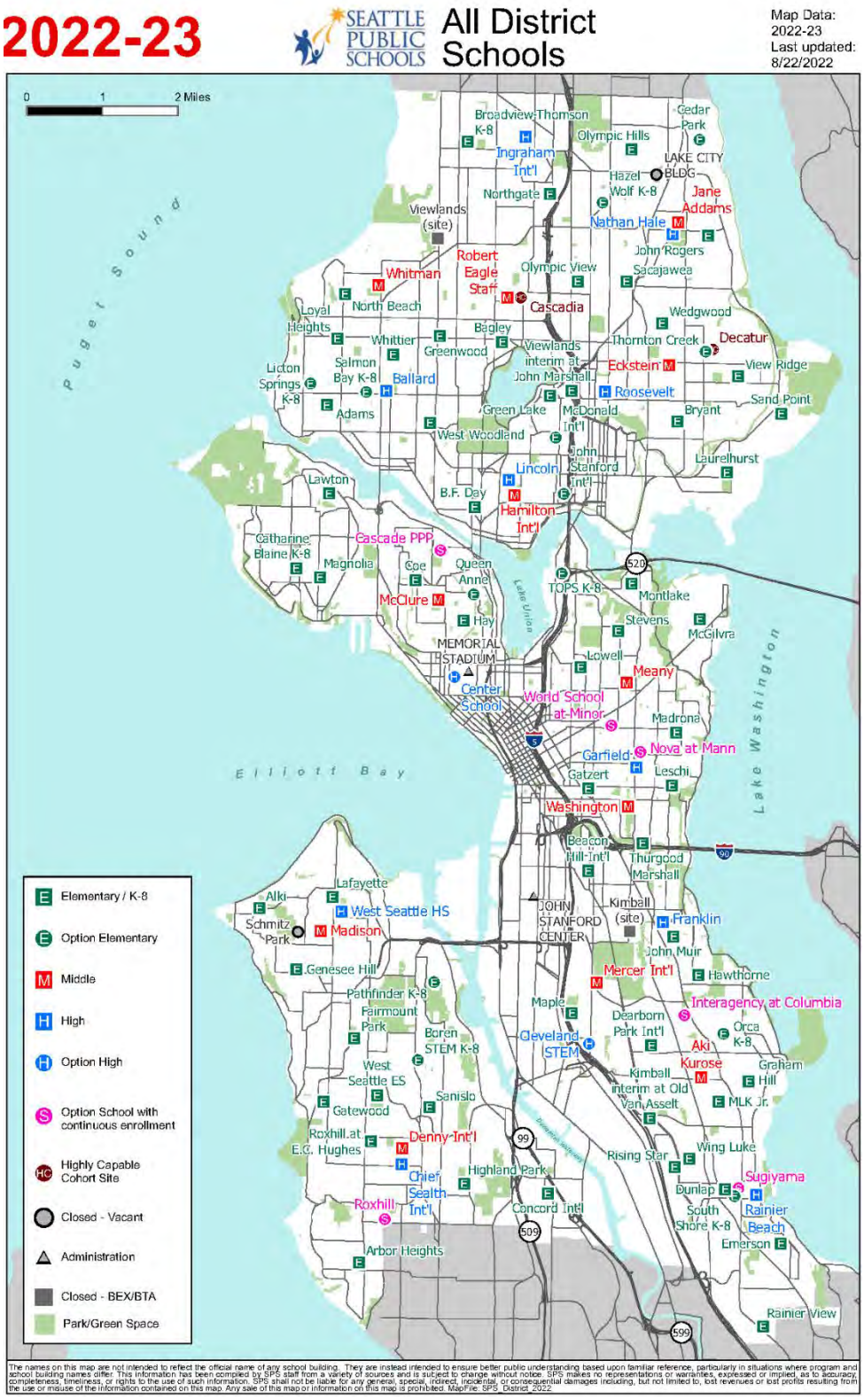
See **Exhibit 3.11-30** and **Exhibit 3.11-31**.

Exhibit 3.11-30. Public and Private Schools in City and Study Areas



Source: King County GIS, 2023; BERK, 2023.

Exhibit 3.11-31. Seattle Public Schools: All District Schools



Source: Seattle School District, 2022.

Capacity at each school and current enrollment is shown in **Exhibit 3.11-32**. Most schools' capacities are higher than current enrollment. In a few instances, capacity is less than enrollment which may require portables. Schools with capacities less than enrollment by more than 10 students include: Lincoln High School, Hazel Wolf K-8, Stevens Elementary School, and Graham Hill Elementary School.

Exhibit 3.11-32. Public Schools, Enrollment, and Capacity by Area

School Name	All Students (2022-23)	Operational Analysis Capacity (2022-2023)	Capital Projects for permanent capacity (2022-2025)
Area 1: NW Seattle			
Adams Elementary School	318	549	
B F Day Elementary School	355	423	
Ballard High School	1,555	1,805	
Broadview-Thomson K-8 School	519	661	
Cascadia Elementary	473	612	
Daniel Bagley Elementary School	322	503	
Green Lake Elementary School	324	387	
Greenwood Elementary School	322	345	
Hamilton International Middle School	927	978	
Licton Springs K-8	98	360	
Lincoln High School	1,632	1,600	X
Loyal Heights Elementary School	502	572	
North Beach Elementary School	340	387	
Robert Eagle Staff Middle School	677	1000	
Salmon Bay K-8 School	660	685	
Viewlands Elementary School	272	351	X
West Woodland Elementary School	398	643	
Whitman Middle School	681	1,033	
Whittier Elementary School	363	471	
Area 2: NE Seattle			
Bryant Elementary School	484	549	
Cedar Park Elementary School	204	283	
Eckstein Middle School	1,047	1,044	
Hazel Wolf K-8	725	658	
Ingraham High School	1,418	1796	
Jane Addams Middle School	885	1175	
John Rogers Elementary School	249	342	X
John Stanford International School	429	437	
Laurelhurst Elementary School	273	369	
McDonald International School	459	471	
Nathan Hale High School	1,081	1,225	
Northgate Elementary School	191	252	X
Olympic Hills Elementary School	453	525	
Olympic View Elementary School	361	458	

School Name	All Students (2022-23)	Operational Analysis Capacity (2022-2023)	Capital Projects for permanent capacity (2022-2025)
Roosevelt High School	1,502	1765	Funding for design only
Sacajawea Elementary School	195	274	X
Sand Point Elementary	160	276	
Stephen Decatur Elementary School	209	291	
Thornton Creek Elementary School	420	586	
View Ridge Elementary School	302	538	
Wedgwood Elementary School	354	478	
Area 3: Queen Anne/Magnolia			
Cascade Parent Partnership Program (North Queen Anne School)	349	unk	X
Catharine Blaine K-8 School	452	749	
Frantz Coe Elementary School	454	503	
John Hay Elementary School	270	477	
Lawton Elementary School	336	479	
Magnolia Elementary School	320	460	
McClure Middle School	428	630	
Queen Anne Elementary	205	500	
The Center School	230	300	
Area 5: Capitol Hill/Central District			
Bailey Gatzert Elementary School	311	336	
Edmonds S. Meany Middle School	512	850	
Garfield High School	1,577	1,619	
Leschi Elementary School	276	330	X
Lowell Elementary School	322	333	
Madrona K-5 School	226	390	
McGilvra Elementary School	223	278	
Montlake Elementary School	184	251	X
Nova High School	285	400	
Seattle World School	179	360	
Stevens Elementary School	176	283	
Tops K-8 School	478	446	
Washington Middle School	555	794	
Area 6: West Seattle			
Alki Elementary School	295	336	X
Arbor Heights Elementary School	487	635	
Chief Sealth International High School	1,178	1455	
David T. Denny International Middle School	816	949	
Fairmount Park Elementary School	413	516	
Gatewood Elementary School	372	464	
Genesee Hill Elementary	523	664	
Highland Park Elementary School	289	306	
Lafayette Elementary School	469	497	
Louisa Boren STEM K-8	468	576	

School Name	All Students (2022-23)	Operational Analysis Capacity (2022-2023)	Capital Projects for permanent capacity (2022-2025)
Madison Middle School	984	1190	X
Pathfinder K-8 School	465	460	
Roxhill Elementary School	243	336	
Sanislo Elementary School	175	264	
West Seattle Elementary School	347	432	X
West Seattle High School	1,301	1357	
Area 7: Duwamish			
Concord International School	291	333	
Area 8: SE Seattle			
Aki Kurose Middle School	773	900	Funding for design only
Alan T. Sugiyama High School	31	250	
Beacon Hill International School	344	407	
Cleveland High School STEM	846	965	
Dearborn Park International School	304	354	
Dunlap Elementary School	242	303	
Emerson Elementary School	307	396	
Franklin High School	1,174	1,398	
Graham Hill Elementary School	268	391	
Hawthorne Elementary School	364	351	
John Muir Elementary School	318	342	X
Kimball Elementary School	379	408	X
Maple Elementary School	434	468	
Martin Luther King Jr. Elementary School	239	336	
Mercer International Middle School	854	1296	X
Orca K-8 School	398	456	
Rainier Beach High School	791	1,088	X
Rainier View Elementary School	240	270	
Rising Star Elementary School	309	480	
South Shore PK-8 School	558	705	
Thurgood Marshall Elementary	464	543	
Wing Luke Elementary School	282	500	
Citywide			
Bridges Transition	128	n/a	
Interagency Detention School	18	n/a	
Interagency Open Doors	84	n/a	
Interagency Programs	194	n/a	
Middle College High School	96	n/a	
Private School Services	180	n/a	
Total	**50,222**	**61,302**	

Sources: Seattle Public Schools 2023; OSPI Student Information, 2023.

Seattle Preschool Program

The Seattle Preschool Program (SPP) is levy-funded and provides an evidence-based preschool program through the Seattle Department of Education and Early Learning (DEEL). It is conducted in partnership with a network of preschool providers throughout the city, including both community-based providers and Seattle Public Schools. About 87 program sites were in use in 2022, with 1,959 students enrolled. About 77% of the students are non-white, and 105 of the seats are for children with individual education plans. About 22 classrooms are for dual language learners. (Seattle Department of Education & Early Learning 2022)

Analysis Areas

Public and private schools are identified in each area below and on maps in **Appendix I**.

Area 1: NW Seattle

The following schools are in Northwest Seattle:

- 19 public schools with 14 elementary (K-5 and K-8) schools, 3 middle schools, and 2 high schools
- 12 private schools serving various grade levels with most religious (Catholic, Jewish) and some secular (language-based, Montessori, independent)

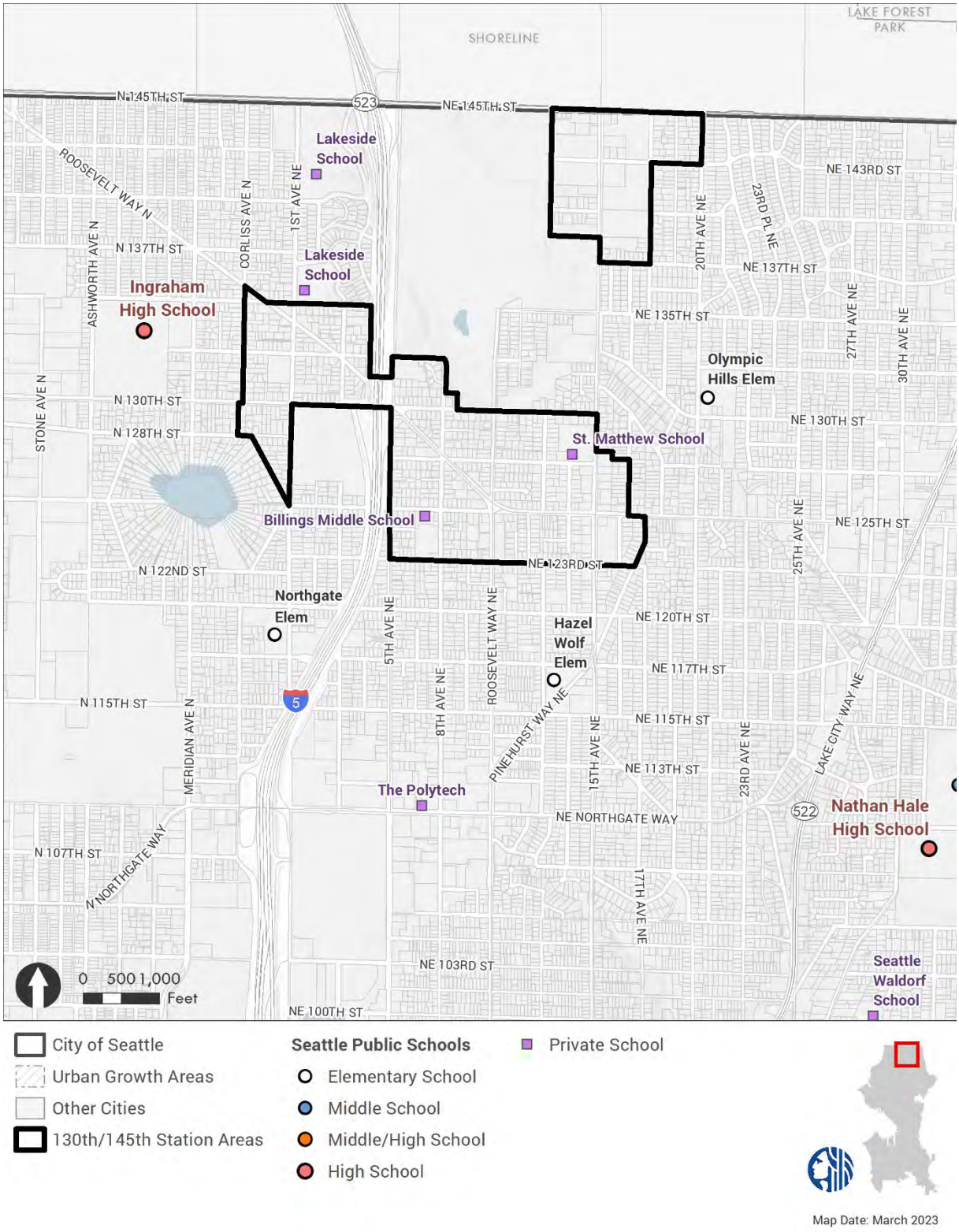
Area 2: NE Seattle

The following schools are located in Northeast Seattle:

- 21 public schools with 16 elementary (K-5 and K-8) schools, 2 middle schools, and 3 high schools
- 23 private schools serving various grade levels with most secular (language-based, Montessori, independent) and several religious (Catholic, Christian)

130th/145th Station Area. The station areas at 130th and 145th are served by several public schools (Hazel Wolf, James Baldwin, and Olympic Hills Elementary Schools; Jane Addams Middle School, and Nathan Hale High Schools). Nearby private schools include Lakeside School (middle and upper schools), Billings Middle School, and Saint Matthew School. See **Exhibit 3.11-33**.

Exhibit 3.11-33. Schools in Vicinity of 130th/145th Station Area



Source: King County GIS, 2023; BERK, 2023.

Area 3: Queen Anne/Magnolia

Area 3 includes the Magnolia and Interbay areas. The following schools are located in Area 3:

- 9 public schools with 6 elementary (K-5 and K-8), 1 middle school, 1 special high school (Center School) and 1 special program (Cascade Parent Partnership Program, K-8, individual academic programs)
- 6 private schools, religious (Catholic) and secular (language-based and independent)

Area 4: Downtown/Lake Union

Area 4 includes Downtown and South Lake Union. It has 4 independent private schools.

Area 5: Capitol Hill/Central District

Area 5 includes the Capitol Hill and Montlake areas. The following schools are located in Area 5:

- 13 public schools with 8 elementary (K-5 and K-8), 1 middle school, 1 high school and 1 middle/high school focused on languages (Seattle World School)
- 6 private schools, religious (Catholic) and secular (language-based and independent)

Area 6: West Seattle

The following schools are located in West Seattle:

- 16 public schools, with 12 elementary, 2 middle schools, 2 high schools
- 9 private schools, religious (Catholic, Christian) and secular (Montessori, independent)

Area 7: Duwamish

Area 7 includes one residential community, South Park. There is one elementary school, Concord Elementary, located in Area 7.

Area 8: SE Seattle

Southeast Seattle includes Beacon Hill, Rainier Valley, and other neighborhoods in Southeast Seattle. The following schools are located in Area 8:

- 22 public schools, with 16 elementary, 2 middle schools, 4 high schools
- 10 private schools, religious (Catholic, Christian, Jewish) and secular (gender-based, independent)

Solid Waste

Seattle Public Utilities has developed the 2022 Solid Waste Plan Update. The plan contains information needed for forecasting future solid waste needs as well as information on landfill contracts, hauling contracts, capital facilities, and staffing. Currently the City of Seattle offers three streams of solid waste to commercial, residential, and self-haul customers. These three streams are garbage, compost, and recycling. Garbage is processed through City operated transfer stations and sent to landfills for long term storage in the Columbia Ridge Regional Landfill and other facilities outside of Seattle. Recycling and compost streams are processed at materials reclamation facilities (MRFs) operated by specific haulers and are sent to one of many facilities depending on the solid waste collection contractor that collected the material, and the stream that was collected. Seattle Public Utilities promotes recycling and composting by offering these services at a discount when compared to garbage collection, and limits contamination of recycling and compost through tags on receptacles and robust sorting at processing facilities.

Citywide

Inventory of Current Facilities

Seattle's Public Utilities' Solid Waste Program encompasses all residents and business owners in Seattle. The program operates a number of capital facilities seen in **Exhibit 3.11-34**, **Exhibit 3.11-35**, and **Exhibit 3.11-36**. Facilities within the City of Seattle are used to sort commercial and residential garbage and recycling as well as hazardous materials. Other facilities outside of Seattle city limits are used for food and yard waste processing as well as landfilling.

Exhibit 3.11-34. Seattle Solid Waste Program, Public Facilities—Garbage Collection

City-Owned Permitted Facilities in Seattle: Operator	Facility	Type
Seattle Public Utilities	North Transfer Station	▪ City-contracted residential garbage and food and yard waste collection transfer ▪ City-contracted commercial garbage and food and yard collection transfer ▪ Self-haul garbage, yard and wood waste, recycling, and reuse
Seattle Public Utilities	South Transfer Station	▪ City-contracted residential garbage and food and yard waste collection transfer ▪ City-contracted commercial garbage and food and yard collection transfer ▪ Self-haul garbage, yard and wood waste, recycling, and reuse
Seattle Public Utilities	North Seattle Household Hazardous Waste Disposal Facility	▪ Self-haul facility for hazardous materials ▪ Batteries, motor oil, cleaning products, paint, light bulbs, and other hazardous materials
Seattle Public Facilities	South Seattle Household Hazardous Waste Disposal Facility	▪ Self-haul facility for hazardous materials ▪ Batteries, motor oil, cleaning products, paint, light bulbs, and other hazardous materials

Source: 2022 Solid Waste Plan Update, 2022.

Exhibit 3.11-35 Seattle Solid Waste Program, Private Facilities—Recycling Collection

Privately-Owned Permitted Facilities in Seattle: Operator	Facility	Type
Recology	MRF	▪ Recycling processing
Republic Services	Rabanco Recycling MRF	▪ Recycling processing ▪ Intermodal transfer of construction and demolition debris to long-haul disposal
Seadrunar	Seadrunar Recycling	▪ Recycling processing
Waste Connections	Northwest Container Service Intermodal Facility	▪ Intermodal transfer of construction and demolition debris to long-haul disposal
Waste Management Inc.	Eastmont Transfer Station	▪ Some garbage transfer. ▪ Some food and yard waste transfer ▪ Construction and demolition debris transfer
Waste Management Inc.	Alaska Reload Facility	▪ Contaminated soil transfer
Waste Management Inc.	Biomedical Waste Facility	▪ Biomedical treatment
Union Pacific Railroad (used by Waste Management Inc.)	Argo Rail Yard	▪ Intermodal transfer of construction and demolition debris and garbage to long-haul disposal

Source: 2022 Solid Waste Plan Update, 2022.

Exhibit 3.11-36 Seattle Solid Waste Program, Private Facilities—Compost Collection

Privately-Owned Permitted Facilities Outside of Seattle: Operator	Facility	Type
Cedar Grove	Cedar Grove Everett	▪ Food and yard waste composting
Cedar Grove	Cedar Grove Maple Valley	▪ Food and yard waste composting
Waste Connections	Finley Buttes Landfill	▪ Construction and demolition landfill disposal
Waste Management Inc.	Columbia Ridge Regional Landfill	▪ Landfill disposal
Republic Services	Roosevelt Landfill (Roosevelt, WA)	▪ Construction and demolition landfill disposal

Source: 2022 Solid Waste Plan Update, 2022.

Transfer Stations, MRFs, & Compost Processing Facilities

City-contracted collectors take the garbage and food and yard waste that they collect to City-owned transfer stations. They take residential recyclables to City-contracted MRFs, where materials are sorted, separated, and prepared for sale. The two Seattle Transfer stations also accept a small volume of recyclables only from self-haul customers. Occasionally, garbage and yard waste are transferred to contracted transfer facilities.

These facilities receive waste, consolidate it into loads, and send them to their next destination. Garbage is compressed and sealed into 40-foot intermodal containers and taken by truck to the Union Pacific Argo Rail Yard where the containers are taken to Columbia Ridge Landfill in Gilliam County, Oregon. As of the 2022 Seattle Solid Waste Plan Update's publication, the Columbia Ridge Landfill has an estimate 143 years of permitted capacity available and the

contract with Waste Management Inc. provides alternative transportation options and disposal options if the rail lines become temporarily unavailable.

Compostable Materials are also loaded into these containers and taken to compost processing facilities owned by either Cedar Grove or Lenz Enterprises. Cedar Grove processes roughly 30% of Seattle's compostable material at both its Everett and Maple Valley facilities and Lenz Enterprises processes the remaining 70% at its Stanwood facility.

Self-haul recyclables that are accepted at the transfer stations are taken to the Rabanco MRF for processing and marketing recyclable material.

Scale operators, floor staff, equipment operators, maintenance laborers, and administrative employees work within the transfer stations to process commercial, residential, and self-haul solid waste.

Residential, Commercial, and Public Place Solid Waste Collection

Residential Customers do not select their waste hauler as Seattle Public Utilities residential and public place solid waste collection is determined by location and is the result of a decennial competitive bid process. These boundaries ensure a high level of service, competitive rates, and efficiency in collection throughout the city. A map of these boundaries can be found in **Exhibit 3.11-37**.

Commercial customers do not select their garbage collection but do have the ability to contract with third-party or private haulers for their recycling and composting. These haulers collect both SPU approved recyclables as well as additional materials depending on the needs of the customer.

The roughly 1,000 public place litter cans throughout Seattle are collected by contracted commercial collectors on a regular schedule and follow the same boundaries as commercial and residential solid waste. These receptacles are in commercial cores throughout the city.

Emergency Solid Waste Management

The City of Seattle provides guidelines for debris removal and processing after a debris-generating disaster in its Disaster Debris Management Plan, Emergency Operations Plan, and Continuity of Operations Plan. These plans ensure that debris generated is collected and disposed of in case of an emergency as well as ensuring that SPU will respond to emergencies and restore infrastructure and systems effected by emergencies.

Exhibit 3.11-37 Solid Waste Service Zones by Contractor—Residential and Commercial

Source: 2022 Solid Waste Plan Update, 2022.

Waste Generation Trends

Between the years 2000 and 2020, residential waste generation accounted for 38% of all non-construction and demolition waste generated in the City of Seattle per data in the 2022 Solid Waste Plan Update. About 10% of the total tonnage was generated by multi-family buildings and 28% were generated by single family households. Commercial waste generation accounted for 49% of the total waste generation during this time and 14% were attributed to self-haul customers at transfer stations. These values can be found in **Exhibit 3.11-38** and will be used in the impacts section to determine how solid waste generation will likely change over time.

Exhibit 3.11-38. Estimated Total Waste Generation by Non-C&D Customer Type, 2000–2020 (tons)

Year	Commercial	Single-Family Residential	Multi-Family Residential	Self-Haul	Total
2000	391,406	208,468	70,944	123,024	793,842
2001	377,927	211,982	68,611	124,453	782,974
2002	366,224	206,474	70,144	125,620	768,462
2003	339,844	205,748	72,149	123,597	741,337
2004	375,739	209,132	72,640	122,835	780,346
2005	385,093	208,675	72,325	124,364	790,456
2006	416,564	216,946	75,545	127,444	836,499
2007	418,979	220,128	77,108	132,545	848,759
2008	390,267	213,889	74,223	111,309	789,688
2009	335,992	215,015	70,524	97,893	719,424
2010	345,692	216,484	70,675	91,618	724,469
2011	351,214	212,861	70,145	81,776	715,996
2012	347,673	211,030	74,549	80,568	713,821
2013	356,480	206,603	76,960	84,341	724,385
2014	369,407	206,992	80,189	64,681	721,269
2015	370,037	204,397	78,278	67,993	720,705
2016	385,846	207,804	80,478	73,923	748,051
2017	398,422	213,709	77,150	111,098	800,380
2018	384,139	210,289	78,245	112,550	785,223
2019	355,453	207,538	80,241	114,234	757,466
2020	286,036	232,038	83,701	109,844	711,619
Average	**368,973**	**211,724**	**105,034**	**74,992**	**760,722**
Sum	**7,748,434**	**4,446,202**	**1,574,824**	**2,205,710**	**15,975,171**
% of Total	**48%**	**28%**	**10%**	**14%**	

Source: SPU 2020 Annual Waste Prevention & Recycling Report, 2021.

3.11.2 Impacts

Impacts Common to All Alternatives

Police

Growth in housing and jobs is expected to occur incrementally under all alternatives. For the purposes of the EIS analysis, increased density of population and jobs is anticipated to increase the potential demand for police services. However, many factors can influence crime rates. Literature and studies have identified population density and socioeconomic conditions (diminished economic opportunities, concentrations of poverty, high level of transiency, low levels of community participation) as factors as well as prevalent attitudes towards crime and crime reporting.

Property crimes are more prevalent than violent crimes and property crimes such as robbery and motor vehicle theft tend to occur at intersections rather than in whole neighborhoods. Victims of crimes are also more likely to be persons of color and younger; this has been observed in 2021 and 2022 Seattle Crime Reports for shootings.[98]

The estimated number of officers per 1,000 residents is 1.4 in 2022. Given that SPD staffing levels are as low as they have been since 1980 based on data collected by the Washington Association of Sheriffs and Police Chiefs (WASPC), this analysis uses a rate of 1.73~~8~~ officers per 1,000 residents, which is the average rate between 2010 and 2022. See **Exhibit 3.11-39**. Though SPD is able to maintain adequate or near-adequate response times for priority 1 calls given the staffing deficiencies in recent years, an anticipated increase in property crimes (likely to be priority 2, 3, or 4 for SPD dispatch) may continue the upward trend of response times beyond acceptable standards.

Exhibit 3.11-39. Estimate of Officer FTEs per 1000 Residents

Alternative	Area 1	Area 2	Area 3	Area 4*	Area 5	Area 6	Area 7*	Area 8	Total
Current (est.)	219.0	177.7	100.5	143.3	193.1	128.0	6.3	109.3	1,077.0
Alternative 1	266.6	222.3	121.2	212.8	239.2	148.9	13.3	132.3	1,356.6
Alternative 2	283.6	242.6	128.8	212.8	250.5	160.9	14.6	136.7	1,430.5
Alternative 3	280.6	249.7	123.8	212.8	241.1	163.7	13.4	145.4	1,430.5
Alternative 4	279.3	252.8	123.5	212.8	241.3	163.2	13.4	144.1	1,430.5
Alternative 5	295.2	262.1	129.2	212.8	249.7	176.8	19.6	158.9	1,504.3
Preferred	310.0	261.1	132.3	211.1	255.6	173.2	12.0	147.2	1,502.6

Note: The level of service calculation is based on Seattle Police Department's average level of service from 2010-2022 which is 1.73~~8~~ officers per 1,000 residents. The Preferred Alternative was added to this exhibit since the Draft EIS—no edits were made to Alternatives 1–5.
*Area 7 is predominantly industrial and will be regardless of alternative growth strategy.
Source: Washington Association of Sheriffs and Police Chiefs, 2023; BERK, 2024~~3~~.

[98] Centers for Disease Control and Prevention (CDC), 2020; Pew Research Center, 2020; Seattle Police Department, 2023; US Department of Justice, FBI, 2011; Weisburd, 2015.

Based on population and housing growth alone Alternative 1 would have the least demand and Alternative 5 and the Preferred Alternative the most demand for police staffing. Most demand would occur in areas with the greatest planned growth in Areas 1 and 2. Area 4 Downtown may need alternative ratios with a focus on office employment as well as residential uses. Area 7 may also need other personnel depending on needs with industrially focused land use.

Fire/Emergency Medical Services

Growth in worker and residential populations in the study area is expected to lead to an increased number of calls for aid, basic and advanced life support, and other emergency services. Growth is expected to occur incrementally under all alternatives, as individual development projects are constructed. The Seattle Fire Department would attempt to maintain response times consistent with or better than current performance levels as the population grows. These performance level benefits and reduced overall response times have a strong correlation with staffing at stations and apparatus availability (Haskell, McAuslan, 2023). Over time, additional staffing and equipment within each analysis area would be required in order to maintain or improve performance levels.

Station 31 is the first of many stations that will be needed to meet the demand of its station area. This station is currently under construction and will eventually have increased unit and staff capacity. As mentioned earlier under **Fire/Emergency Medical Services** in **Section 3.11.1**, the City also anticipates it will need to replace Station 3 and the Fire Marshal office, acquire, or develop a new facility for SFD Headquarters, replace or expand the commissary and fire garage, develop a fire station in South Lake Union, and develop a freshwater marine fire suppression facility (City of Seattle 2020).

Based on growth projections of housing units, conversations with SFD staff on current deficits, and the minimum number of apparatuses to maintain a service level close to the current ratios of fire units to housing units, the resulting fire units needed are presented, and rounded to the higher whole number in **Exhibit 3.11-40**.

Exhibit 3.11-40. Apparatus Need by Alternative and Area

Alt	Units	Current Housing Unit per Fire Units	Housing Unit per Fire Unit with Growth Alternative (current app. Inventory)	Area: Fire Units Needed Based on Study Area Growth Estimates and Existing Deficiencies ~~(Rounded)~~*								Total New Additional Fire Units (Estimate ~~Rounded~~)	Projected Housing Units per Fire Unit if Adopted
				1	2	3	4*	5	6	7*	8		
1	Engine	12,231	14,731	1	1	1	1	1	0	0	1	6~~7~~	12,405~~087~~
	Ladder	32,616	39,283	0	0	1	0	0	0	1	1	3	31,426
	Medic	43,488	52,377	0	0	1	1	0	1	0	0	3	39,283
	Aid	55,913	67,342	1	0	1	0	1	1	0	1	4	42,854
	Other	19,570	23,570	1	1	0	0	0	1	1	0	4	19,641
2	Engine	12,231	15,356	1	1	1	1	1	1	1	1	8	12,285
	Ladder	32,616	40,950	0	0	1	0	0	0	1	1	3	32,760
	Medic	43,488	54,599	0	0	1	1	0	1	0	0	3	40,950
	Aid	55,913	70,199	1	1	0	0	1	1	0	1	5	40,950
	Other	19,570	24,570	1	1	0	0	0	1	1	0	4	20,475
3	Engine	12,231	15,356	1	1	1	1	1	1	1	1	8	12,285
	Ladder	32,616	40,950	0	0	1	0	0	0	1	1	3	32,760
	Medic	43,488	54,599	0	0	1	1	0	1	0	0	3	40,950
	Aid	55,913	70,199	1	1	0	1	0	1	0	1	5	40,950
	Other	19,570	24,570	1	1	0	0	0	1	1	0	4	20,475
4	Engine	12,231	15,356	1	1	1	1	1	1	1	1	8	12,285
	Ladder	32,616	40,950	0	0	1	0	0	0	1	1	3	32,760
	Medic	43,488	54,599	0	0	1	1	0	1	0	0	3	40,950
	Aid	55,913	70,199	1	1	0	1	0	1	0	1	5	40,950
	Other	19,570	24,570	1	1	0	0	0	1	1	0	4	20,475
5	Engine	12,231	15,981	2	1	1	1	1	1	1	1	9	12,473
	Ladder	32,616	42,616	0	0	1	0	1	0	1	1	4	31,962
	Medic	43,488	56,822	1	0	1	1	0	1	0	0	4	39,338
	Aid	55,913	73,056	1	1	1	0	1	1	0	1	6	39,338
	Other	19,570	25,570	1	1	0	0	0	1	1	0	4	21,308
PA	Engine	12,231	15,981	2	1	1	1	1	1	1	1	9	12,473
	Ladder	32,616	42,616	0	0	1	0	1	0	1	1	2	36,528
	Medic	43,488	56,822	1	0	1	1	0	1	0	0	3	42,616
	Aid	55,913	73,056	1	1	1	0	1	1	0	1	6	39,338
	Other	19,570	25,570	1	1	0	0	0	1	1	0	4	21,308

Fire unit increase based on LOS Calculation	Fire unit recommendations have been lowered slightly from LOS calculation to reflect needs based on minimum service provision rather than calculated current service provision	Fire unit recommendations have been raised slightly from LOS calculation to reflect needs based on minimum service provision rather than calculated current service provision

*Area~~s~~ 4 recommendations are based on current LOS deficit. Area~~and~~ 7 ~~will~~ only partially use~~s~~ housing data to support additional fire unit recommendations as the current ratio is based on very few housing units and maintaining the current ratio is far beyond LOS standards~~due to employment characteristics~~.
Note: Color coding and key added since Draft EIS for additional clarification on fire unit recommendation rationale. The Preferred Alternative was added to this exhibit since the Draft EIS—minor edits to Alternatives 1–5 aside from the color coding are shown in tracks.
Sources: Seattle Fire Department Annual Report, 2022; BERK, 2024~~3~~.

Additional units would need to be added to meet the current levels of service average dwelling units served by each number of apparatus and type of apparatus. However, based on Seattle Fire Department's Live dispatch dashboard as well as the SFD 2022 annual report, citywide unit additions should reflect aid unit prioritization over other fire units. Across all alternatives, each subarea or battalion should have at least a single aid unit stationed at a centrally located station to limit fire unit dispatches on aid calls.

Secondarily, the recommendations for Area 4 are consistent across all alternatives and reflect the growing need for an additional unit to fill the gap in service in the South Lake Union neighborhood. Overall, these recommendations are based on current service standards which can be greatly improved per **Exhibit 3.11-40**~~Exhibit 3.11-41~~.

Alternative 5 and the Preferred Alternative having the highest growth has the greatest need for apparatus. More apparatus under any of the alternatives may require additional personnel and expanded stations. Any potential future fire facility, staffing, or equipment needs will be included as part of the City's annual Budget and Capital Improvement Program process.

Building Heights and Density

Existing ladder trucks at fire stations citywide are equipped to provide services to buildings of the heights proposed under all alternatives.

Additionally, new buildings of three or more units would be required to meet the Seattle Fire Code which requires sprinklers throughout. No impacts to fire services are anticipated due to increases in building height or density.

Hazardous Materials

Industrial uses often include hazardous materials or have the potential to produce hazardous waste. Hazardous materials are defined by the City of Seattle as "those that pose an unreasonable risk to the health and safety of operating or emergency personnel, the public, and the environment if not properly controlled during handling, storage, manufacture, processing, packaging, use, disposal, or transportation" (City of Seattle 2018).

Additional industrial development under all of the alternatives could increase the amount or prevalence of hazardous materials in the study area. All new development would be required to meet the Seattle Fire Code which includes provisions for hazardous materials. Development proposals would be reviewed by the Seattle Department of Construction & Inspections as well as the SFD. Additional federal and state regulations also apply to development that includes hazardous materials or wastes—for example, WSDOT regulates off-site transportation of hazardous materials, and the Washington State Department of Ecology requires additional permits and inspections for such facilities as underground storage tanks (Seattle Industrial and Maritime Strategy EIS, 2022).

Construction

The Seattle Fire Department makes service calls related to inspection of construction projects and calls to respond to construction-related accidents. As such, increased construction activities associated with potential development under all alternatives could result in an increase in demand for fire services. Existing Fire Department staffing and equipment are anticipated to be sufficient to handle the increased services needed for construction activities.

Transportation Network and Traffic Volumes

Use of the public right of ways is critical to SFD meeting their response goals as the Department is dependent upon the capability of the city's street network to handle traffic flows. Traffic volumes are anticipated to increase under all of the alternatives and no specific transportation projects or changes to emergency access routes are proposed under any of the alternatives, but changes to the street network over time has the potential to impact the mobility of fire response vehicles.

Any street improvements must be consistent with the Seattle Fire Code Section 503 and Appendix D, which address fire apparatus access roads. Additionally, SFD reviews proposed street improvements on a project-by-project basis to identify potential negative impacts on response times. It is anticipated that these mitigation measures would adequately address the potential impacts of future changes to the transportation network under any of the alternatives.

Outreach & Additional Programming

Seattle Fire Department's education programs and fire prevention services utilize education and code enforcement as tools to lower demand on SFD firefighting and EMT resources. Fire prevention services include the Fire Investigation Unit, community risk reduction program, building/construction inspections and permitting, mobile inspections and pre-planning for fire response, plan preview, special hazards, special events and temporary assembly support, and suppression systems testing. These prevention strategies and programs help to reduce the overall demand for SFD services and can help reduce response time and potential negative outcomes from emergencies.

SFD also provides a number of outreach programs, which are necessary to reduce fire risk and increase public awareness on fire safety. These programs restarted in 2022 after a multi-year hiatus caused by the COVID-19 Pandemic. These events can give communities and individuals the tools they need to reduce fire risk and produce better outcomes in the event of emergencies.

Additional information on both fire prevention and outreach events are detailed in both the SFD 2022 Annual Report and **Equity & Climate Vulnerability Considerations** section below.

Parks

Demand & Level of Service

The ~~current~~ former 2017 parks level of service is 8.0 acres per 1,000 population (from Seattle 2035 and 2017 Parks and Open Space Plan). However, the city ~~is considering options for updating~~ updated the level of service as part of an update to the Parks and Open Space Plan in 2024. The 2024 Parks and Open Space Plan's adopted level of service aims to provide parks and park facilities within a 10-minute walk of all residents. As of 2023, approximately 95% of the City's population are within a 10-minute walk of a park or park facility. Within designated regional and urban centers, the City aims to provide parks and park facilities within a 5-minute walk of residents.~~The goal of updating the level of services is to make it more consist with the City's goals and approach to acquisition.~~

~~Additional park acres would be needed under each alternative if the City maintains its 8.0 acres per 1,000 population level of service. Currently, Seattle Parks and Recreation manages 6,478 acres of parks in 2024; see **Exhibit 3.11-25**. The acreage needed would range from 1,312 to 1,968 acres between Alternative 1 and Alternative 5, with Alternatives 2 through 4 requiring an additional 1,640 acres.~~ The alternatives would add more growth including within a 10-minute walk to the parks, and increase demand and use of current parkland. Alternative 1 would have the lowest additional demand with 80,000 more dwelling units and Alternative 5 and the Preferred Alternative the greater demand at 120,000 new housing units. Within each analysis area, the ~~acres~~ population demand ~~required are~~would be highest under the Preferred Alternative (areas 1, 3, 5) or Alternative 5 (areas 2, 6, 7, and 8). ~~except that~~In Area 4, Downtown would have ~~the same~~similar growth and ~~acres needed~~park demand under ~~all~~ studied alternatives, with a slightly lower population under the Preferred Alternative. Under each alternative, expected population growth is lowest in Area 7 due to the focus on employment (except in South Park). ~~See **Exhibit 3.11-41**.~~

~~**Exhibit 3.11-41. Additional Acreage Needed to Meet Parks LOS by Alternative**~~

~~Alternative~~	~~Total Net Acreage Needed~~
~~**Alternative 1**~~	~~1,312~~
~~**Alternative 2**~~	~~1,640~~
~~**Alternative 3**~~	~~1,640~~
~~**Alternative 4**~~	~~1,640~~
~~**Alternative 5**~~	~~1,968~~

~~Notes: Converts housing units to population using a persons per household of 2.05 consistent with regional housing target efforts. The 8 acres per 1,000 population is applied to net population growth.~~
~~Source: BERK, 2023.~~

The City currently has 6,478 acres of parkland. The city contains 53,651 acres and existing open space equates to approximately 12% of the city. If the city obtained the average amount of the alternatives this would raise the total open space to approximately 15% of the city. If no new

acres are added to the City's inventory, the ~~LOS~~ rate of acres per 1,000 would drop as shown in **Exhibit 3.11-41**. ~~Under this scenario, the City could acquire new park land to meet the LOS or change the LOS itself.~~ The City will address park needs within a 10-minute walk of parks.

Exhibit 3.11-41. Acres per 1,000 Population if Park Inventory Does Not Increase

	Actual 2022	Actual 2023	POS 2035	Alt. 1 2044	Alt. 2-4 2044	Alt. 5 2044	Preferred 2044
Population	762,500	779,200	802,358	966,358	862,500	1,007,358	1,007,358
Rate: Acres per 1,000 population	8.50*	8.31	8.07	6.70	6.43	6.18	6.18

Note: Adds potential population of 2.05 persons per household within new housing units to an estimated 2024 base population of 802,358 accounting for housing under construction or permitted. The Preferred Alternative was added to this exhibit since the Draft EIS—no edits were made to Alternatives 1–5.
*The acres of parks increased between 2017 and 2024 from 6,414 to 6,478. The 2024 estimate is used in this table.
Sources: OFM, 2022; Seattle Parks and Recreation, 2017; BERK, 2024.

Shorelines Public Access

Greater population growth across the city could increase demand for shoreline public access. The alternatives would range in demand from the least under Alternative 1 to the most under Alternative 5 or the Preferred Alternative. Shoreline Master Program requirements for shoreline public access for non-residential development could result in more public access as development occurs in shoreline jurisdiction.

130th/145th Station Area

All alternatives would result in an increased demand for parkland in the city, with most demand under Alternative 5 and the least demand under Alternative 1 and the Preferred Alternative in the 130th Street Station Area. In the 145th Street Area, demand for parkland would be slightly higher under Alternative 2 and Alternative 5 than the No Action Alternative (with demand highest under Alternative 2). See **Exhibit 3.11-42** for a comparison using the 2017 acre metric. The additional population in Alternatives 2 and 5 would create a greater demand within 10 minutes of existing parkland compared to Alternative 1 and the Preferred Alternative.

Exhibit 3.11-42. Growth by Area and Alternative Demand for Park Acres: Station Area

	130th Street Population: Net	130th Street Park Demand (Acres)	145th Street Population: Net	145th Street Park Demand (Acres)
Alternative 1	399	3	1,324	11
Alternative 2	2,151	17	2,376	19
Alternative 5	3,371	27	2,171	17
Preferred	3,245	26	1,317	11

Note: Alternatives 1, 2, and 5 assume a potential population of 2.05 persons per household consistent with regional housing target efforts. The Preferred Alternative uses updated and more detailed information to calculate population growth. Existing population by center is based on OFM's 2023 SAEP April 1 census block estimate of

total population within the revised center boundaries of the Preferred Alternative. Future 2044 population by center was calculated using OFM's 2023 housing unit estimate, additional housing unit permits issued between April 1, 2023 and June 1, 2024 (since the 2023 OFM estimate), a citywide household occupancy rate of 93%, estimated existing people per household by center (per OFM's 2023 household and population estimates), and housing unit growth targets. The Preferred Alternative assumes a potential population of 2.29 persons per household in the 130th Street Urban Center and 2.02 persons per household in the 145th Neighborhood Center. The Preferred Alternative was added to this exhibit since the Draft EIS—no edits were made to Alternatives 1, 2, or 5.
Sources: Seattle Parks and Recreation, 2017; City of Seattle, 2022 and 2024; BERK, 2024~~3~~.

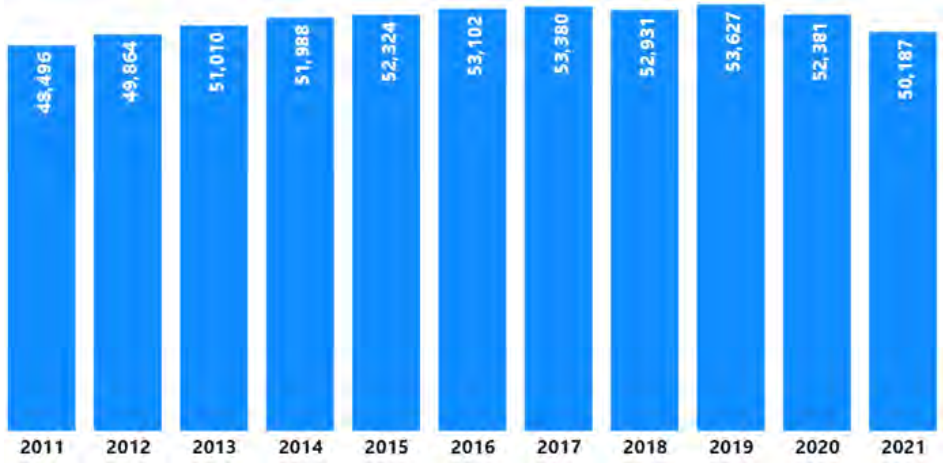
Schools

School enrollment is affected by a variety of factors including demographic trends, economic conditions, private school enrollment, and characteristics of housing stock such as size and cost.

Existing Trends

There are currently 50,056 students enrolled in Seattle Public Schools. This number represents about 80% of children enrolled in K-12 education. Over the last 10 years, enrollment in Seattle Public Schools increased from 49,900 students in 2012 to 53,600 students in 2019 and then decreased to ~~*~~50,056 students by 2022. This change occurred during a period that Seattle added around 75,000 housing units. See **Exhibit 3.11-43**.

Exhibit 3.11-43. Seattle Public School Enrollment 2012-2022



Source: SPS, 2023.

Estimates at Current Student Ratio

It is not possible to develop an accurate twenty-year projection of school needs given the wide variety of factors that influence these numbers and the recent fluctuations in public school enrollment. As a high-end estimate of potential impacts, it may be helpful to estimate the number of new classrooms that would be needed if recent trends change and the percentage of the total population enrolled in Seattle Public Schools holds steady over the next twenty years. Based on current student enrollment and city population, about 6.56% of the total population are K-12 students in the Seattle Public School District. See **Exhibit 3.11-44**.

Exhibit 3.11-44. Students as Percentage of Total Population

	Number
Seattle School District Population (OFM 2022)	763,302
Enrollment Seattle School District OSPI 2022-2023	50,056
Students as a Percentage of Total Population	6.56%

Source: OSPI Student Information, 2023; OFM, 2022; BERK, 2023.

Applying this rate to expected population growth shows a range of 10,912-16,368 students generated by each alternative, the least under Alterative 1 and the most under Alternative 5 or the Preferred Alternative. See **Exhibit 3.11-45**. Depending on the grade level and pace of housing and population growth, new classrooms or schools could be needed over time to accommodate growth. The total number of students is divided by 25 students per elementary school classroom to translate this number into potential elementary school classrooms—between 436 and 655 classrooms. This additional enrollment could be accommodated through a combination of accommodating students at schools that are currently under capacity, adding classrooms at existing school sites, and, potentially, adding new schools.

Exhibit 3.11-45. Housing, Population, and Potential Public School Students Assuming Current Student Percentage

Alternative	Net Change in Housing	Net Change in Population	Student Generation	Equivalent Elementary Classrooms
Alternative 1	80,000	164,000	10,755~~10,912~~	430~~436~~
Alternative 2	100,000	205,000	13,444~~13,640~~	538~~546~~
Alternative 3	100,000	205,000	13,444~~13,640~~	538~~546~~
Alternative 4	100,000	205,000	13,444~~13,640~~	538~~546~~
Alternative 5	120,000	246,000	16,132~~16,368~~	645~~655~~
Preferred	120,000	246,000	16,132	645

Note: Converts housing units to population using a persons per household of 2.05 consistent with regional housing target efforts~~Applies 2.05 per household, 2017-2021 ACS~~; assumes 25 students per classroom. The Preferred Alternative was added to this exhibit since the Draft EIS—edits to Alternatives 1–5 are shown in tracks.
Source: City of Seattle, 2024~~3~~; SPS, 2021; SPS 2023; BERK, 2024~~3~~.

Under this calculation, most population growth, and therefore students, would be added in areas 1 and 2 for all of the alternatives (see **Exhibit 3.11-46**). Student growth in Area 4 would be the same across all Draft EIS alternatives 1 to 5 and would likely go to schools in areas 3 and 5 as there are no schools located in Downtown. Preferred Alternative students in Area 4 are slightly lower. Areas 6, 7, and 8 would have the second highest share of population and students in all the Draft EIS action alternatives. Preferred Alternative students in Areas 6-8 are slightly lower. In total the Preferred Alternative students are the same as Alternative 5.

Exhibit 3.11-46. Share of Students by Area: North, Central, and West/South Seattle Assuming Current Student Percentage

Alternative	Areas 1-2	Students (Net)	Area 4	Students (Net)	Areas 3 & 5	Students (Net)	Areas 6-8	Students (Net)	Total Students (Net)
Alternative 1	33%	3,569 ~~3,621~~	24%	2,610 ~~2,648~~	24%	2,591 ~~2,629~~	18%	1,985 ~~2,015~~	10,755~~10,912~~
Alternative 2	37%	4,925 ~~4,997~~	19%	2,610 ~~2,648~~	24%	3,280 ~~3,328~~	20%	2,629 ~~2,667~~	13,444~~13,640~~
Alternative 3	38%	5,078 ~~5,152~~	19%	2,610 ~~2,648~~	20%	2,752 ~~2,793~~	22%	3,003 ~~3,047~~	13,444~~13,640~~
Alternative 4	38%	5,141 ~~5,216~~	19%	2,610 ~~2,648~~	20%	2,749 ~~2,789~~	22%	2,944 ~~2,987~~	13,444~~13,640~~
Alternative 5	38%	6,057 ~~6,146~~	16%	2,610 ~~2,648~~	20%	3,262 ~~3,310~~	26%	4,203 ~~4,264~~	16,132~~16,368~~
Preferred Alternative	41%	6,612	16%	2,571	22%	3,578	21%	3,371	16,132

Note: The Preferred Alternative was added to this exhibit since the Draft EIS—edits to Alternatives 1–5 are shown in tracks.
Source: BERK, 2024~~3~~.

Within the analysis areas, most growth would be directed to centers and villages under all alternatives and schools in those areas would be most affected. However, in Alternatives 2 through 5, more areas currently designated urban neighborhood and proposed as urban neighborhood would see growth, which may be focused around neighborhood centers, corridors, or elsewhere distributed through distributed growth of missing middle housing types.

Overall Impact

While K-12 public school enrollment has declined over the last 5 years, and is projected to continue declining through 2033, future population growth through 2044 has the potential to increase student enrollment in various areas throughout the city. Seattle Public Schools monitors changes in enrollment to track expected future needs and would adjust their enrollment projections accordingly for future planning cycle. SPS would respond to the exceedance of capacity as it has done in the past by adjusting school boundaries and/or geographic zones, adding or removing portables, adding/renovating buildings, reopening closed buildings or schools, and/or pursuing future capital programs.

130th/145th Station Areas

Under multiple alternatives, two station areas at 130th and 145th Street would be rezoned and allow greater density. There would be an increase in housing and population with most under Alternative 5 and least under Alternative 1. This increase could lead to an increase in the student population as well. Depending on alternative, the number of students could be greatest in 130th Street Station (Alternative 5) or at 145th Street (Alternative 2). See **Exhibit 3.11-47**.

Exhibit 3.11-47. Share of Students by Station Area Assuming Current Student Percentage

Alternative	130th Street Housing Units (Net)	Population (Net)	Students (Net)	145th Street Housing Units (Net)	Population (Net)	Students (Net)	Total Students 130th-14t5th
Alternative 1	194	399	27	646	1,324	87	113
Alternative 2	1,049	2,151	143	1,159	2,376	156	297
Alternative 5	1,644	3,371	224	1,059	2,171	142	363
Preferred	1,500	3,245	213	652	1,317	86	299

Note: The Preferred Alternative was added to this exhibit since the Draft EIS—no edits were made to Alternatives 1–5.
Source: BERK, 2024~~3~~.

Solid Waste

Growth in residential, commercial, and self-haul solid waste is expected to increase under all alternatives. For the purposes of the EIS analysis, increased density of population and jobs is anticipated to increase demand linearly. Estimates for this EIS are based on average annual tons of waste produced by sector and solid waste stream from 2020-2020. From 2000 to 2020 recycling and composting rates have increased per capita in Seattle while overall residential waste decreased every year from 2000-2019 with a slight increase in 2020 due to the COVID-19 Pandemic.

Exhibit 3.11-48 shows the most recent per capita waste generation from 2020 extracted from the 2022 Solid Waste Plan Update. Based on population, jobs, and housing growth alone Alternative 1 would have the least waste generation and Alternative 5 and the Preferred Alternative the most. Most demand would occur in areas with the greatest planned residential growth such as Areas 1 and 2 while Area 4 would see an increase in both commercial and residential solid waste. Other areas and alternatives will also see growth in solid waste service demand proportionate to growth planned.

Exhibit 3.11-48. 2020 Waste Generation Rates/Capita/Year based on 2020 Rates

	Commercial	Single-Family Residential	Multi-Family Residential	Self-Haul
Recycling + Compost	61.6%	71.2%	36.6%	11%
	1.93 lbs./employee/day (estimated)	1.62 lbs./resident/day (estimated)	0.83 lbs./resident/day (estimated)	0.19 lbs./resident/day (estimated)
Garbage	38.4%	28.8%	63.4%	89%
	1.21 lbs./employee/day (estimated)	0.65 lbs./resident/day (estimated)	1.44 lbs./resident/day (estimated)	1.54 lbs./resident/day (estimated)
Total Waste Generation Rate per capita	3.14 lbs./employee*/day (estimated)	2.27 lbs./resident/day (estimated)	2.27 lbs./resident/day (estimated)	1.73 lbs./resident/day (estimated)
Total Waste Generation in 2020	572,072,000 lbs.	464,076,000 lbs.	167,402,000 lbs.	219,688,000 lbs.

* "Employees" in this dataset refers to positions covered by the Washington Unemployment Insurance Act. The Act exempts self-employed, proprietors, and corporate officers, military personnel, and railroad workers, so those categories are not included in the dataset. Covered Employment accounts for approximately 85% to 90% of all employment.
Source: Seattle 2022 Solid Waste Plan Update (Ch. 3), 2022; BERK, 2023.

Exhibit 3.11-49 and **Exhibit 3.11-50** offer estimates of each solid waste stream by customer types for alternatives based on job growth estimates and housing units. The number of people per household is variable but is estimated at 2.05 people per household for these calculations. All alternatives estimate 158,000 additional jobs in Seattle between 2024 and 2044.

Exhibit 3.11-49. Estimated Tons of Solid Waste (Garbage, Recycling, Compost) Generated by Alternative—Residential

Scenario	Resident estimates	Tons of Waste Per year estimate	Tons of Diversion at goal rate: 70%
Current: 2020	762,148	315,739	221,017
Alternative 1	966,358	400,338	282,336
Alternative 2	1,007,358	417,323	292,126
Alternative 3	1,007,358	417,323	292,126
Alternative 4	1,007,358	417,323	292,126
Alternative 5	1,048,358	434,308	304,015
Preferred	1,048,358	434,308	304,015

Note: The Preferred Alternative was added to this exhibit since the Draft EIS—no edits were made to Alternatives 1–5.
Sources: SPU, 2020 Annual Waste Prevention & Recycling Report; BERK, 2024~~3~~.

Exhibit 3.11-50. Estimated Tons of Waste Generated for Commercial Customers

Year	Employee Estimates	Tons per year based on 2020 per employee estimate	Diversion at current recycling rate: 61.6%	Diversion at goal recycling rate: 70%
2020 (per 2020 employee estimate)	499,146 employees	286,036 tons	176,198.2 tons	200,225.2 tons
2044 estimates, all alternatives	746,447 employees	427,751 tons	263,494.9 tons	299,426 tons

Sources: SPU, 2020 Annual Waste Prevention & Recycling Report; BERK, 2023.

To meet the additional need for solid waste services, contracts with waste haulers are renegotiated every 10 years. Fees charged to residential and commercial customers from Seattle Public Utilities and from waste haulers directly support the necessary capital investments needed to ensure minimum levels of service.

Equity & Climate Vulnerability Considerations

Police

SPD has developed Micro Community Policing Plans (MCPP) to address the individual needs of each community. Based on the City's equity opportunity areas evaluation and engagement with the community in each area, these plans could be updated.

Police access to parts of the city could be affected by extreme precipitation, flooding, sea level rise, and landslides. Response times may be affected by climate-exacerbated natural hazards such as flooding. As police officers often work outdoors, officers may be affected by extreme heat. These considerations are expected to be similar across alternatives; alternatives with greater growth may require greater police services and may mean additional personnel and facilities that need to be adapted for climate resilience.

Fire/Emergency Medical Services

SFD leverages staff, facilities, and training resources to better address inequitable distributions of fire risk in homes, inequitable health outcomes, and the increased risk of wildfire smoke in our region.

While the Seattle Fire Department is the main firefighting entity within Seattle, most of its work is rooted in health services and fire prevention. To reduce fires in homes SFD works with communities throughout Seattle to distribute fire prevention flyers that have been translated in the top seven spoken languages in Seattle to ensure compliance with fire safety standards regardless of language.

Fire prevention outreach also helps alleviate racial and social inequities. There is a correlation between age of housing units and high prevalence of disadvantages related to Race and Socio-economic status. Data gathered via Seattle's Market Rate Housing Needs and Supply Analysis (2021) as well as the Seattle Racial and Social Equity Index (2018) indicate that housing structures in the Southwest, Southeast, and East Central regions of the city are more likely to be older and to potentially benefit from fire prevention outreach. These areas are also more disadvantaged than elsewhere in the city per the Racial and Social Equity Index. Targeting fire prevention outreach in these areas is vital to alleviating fire safety inequity.

Aside from outreach and prevention, SFD also performs fire inspections on existing homes as well as required inspections on new development. Each growth alternative will result in an increase in the number of multi-family units and may require additional staff to adequately provide fire prevention services to the growing population. Alternative 5 and the Preferred Alternative would have more demand than Alternatives 2-4 and Alternative 1. See **Exhibit 3.11-40**.

Aid and medical response are also duties of SFD. Negative health outcomes as a result of certain environmental and climatic conditions are inequitably distributed in historically disadvantaged communities such as poor air quality or wildfire smoke leading to respiratory and cardiovascular diseases. Poor air quality may result in more serious chronic medical conditions that require emergency medical transport more often as well as Basic or Advanced life support for acute medical emergencies. Air quality hazards are exacerbated by climate change, vehicular traffic, and the increased wildfire smoke risk facing Washington State in recent years (Seattle & King County Public Health 2021). The potential for each alternative to locate growth near sources of pollution like major highways is addressed in **Section 3.2 Air Quality & GHG Emissions**.

Parks

Alternatives & Parks in Highest Equity Priority Areas

Parks are important for community health and well-being and a key amenity in growth areas. The City developed an overlay of public space priority areas considering race and social equity, density and growth, and health outcomes in **Exhibit 3.11-51**. Areas of centers/ urban centers are considered a priority for 5-minute walks to parks and areas outside of centers/ urban centers are considered a priority for 10-minute walk to parks.

Since the 2020 evaluation of "Outside Citywide" the City has updated its Racial and Social Equity Index in with ACS 5-Year data 2017-2021; see **Chapter 1**. Areas of the highest priority for plans/programs/investments based on Race and Social Equity are generally in the south end of the City including Delridge (Area 6), South Park (Area 7), and Southeast Seattle (Area 8), as well as locations generally north of NE 85th Street along NE 145th Street/SR 523 (Area 1) and along Lake City Way/SR 522 (Area 2), and central areas like Pioneer Square, International District, and Central District (Areas 4 and 5). The University District has a high share of students who likely have lower incomes. Area 3 does not have highest or second highest equity priority areas.

Urban centers considered to be park priority investment areas in **Exhibit 3.11-51** are not necessarily considered highest equity priority considering the Racial and Social Equity Index alone, including Ballard, West Seattle Junction, and Morgan Junction.

Exhibit 3.11-51. Racial and Social Equity Index: Highest Equity Priority

Analysis Area	General Areas of Concern	Areas Subject to Urban Centers Walkability Policy in POS Plan
1	Bitter Lake, N 105th Street	Bitter Lake
2	Northgate, and Lake City Way University District	Lake City, Northgate U District
3	None	None
4	Downtown, Pioneer Square, and International District	Downtown
5	Yesler Terrace and Atlantic neighborhoods	First Hill/Capitol Hill 23rd & Union Jackson
6	High Point, South Delridge, Roxhill, Highland Park	Westwood-Highland Park
7	Greater Duwamish and South Park	South Park

Source: BERK, 2023.

Alternative 5 and the Preferred Alternative have ~~has~~ the most growth of the studied alternatives and generally would distribute the most growth and demand for parks under all areas except Area 4 Downtown where proposed growth is consistent across all alternatives and Area 5

(Central/East) where Alternative 2 has the most growth proposed. Where growth is focused, there could be more investment in parkland to serve the growth including in Race and Social Equity priority areas, particularly if the City requires provision of open space or contribution to city parks by new development. However, if growth outpaces investment in parks, there could be a degradation of acres per capita and greater demand on existing facilities.

Parks & Heat Islands

The areas considered to have greater heat islands due to impervious areas and less tree canopies are shown on **Exhibit 3.11-52**. Particularly warm areas morning and evening include Downtown, Greater Duwamish MIC, and Southeast Seattle, portions of which are considered to be Highest Equity Priority in part. Adding parkland and improving tree canopy in parkland and other public property like rights of way could also improve climate resilience and community health.

Exhibit 3.11-52. Heat Islands in Seattle

Notes: The morning index illustrates areas with the most concreate and building mass such as downtown Seattle are warm and likely retaining heat and emitting the previous day's heat through the nighttime. The afternoon map shows cooler temperatures; mid-day shadowing from buildings could cool temperatures in downtown. The evening temperatures are relatively high again with greater areas of concrete retaining heat into the evening.
Source: CAPA/NIHHIS. 2022. "Heat Watch Seattle & King County." OSF. August 2. osf.io/mz79p.

Schools

Seattle's Racial and Social Equity Index identifies Highest or Second Highest Equity Priority Areas around Rainier Valley, Beacon Hill, Delridge, High Point, Downtown, Central Area, University District, Greenwood, Bitter Lake/Haller Lake, and Lake City. More of the priority areas are in study areas 6, 7, and 8 in the southern portion of the city.

The City's responsibility in planning for schools is to coordinate with the School District in planning for growth and modernization. The City is also responsible for implementing zoning and development standards regulating new development on school property. The City also plays a role in ensuring access to schools with safe travel routes. Equitable access improvements would help all local students in priority areas for race and social equity. The latest 2021-2025 action plan includes priorities for communities of color, low-income communities, immigrant, and refugee communities, those with disabilities, homeless, LGBTQ communities, and girls.

Solid Waste

Seattle Public Utilities' Solid Waste Division has staff and contractors that are at high risk for the negative impacts of extreme weather events. Many of these workers are subject to extreme heat and extreme precipitation events that are made more severe and common by climate change. These hazards are mitigated through contracts with waste hauling entities to ensure the health and safety of staff that are at risk.

SPU has also joined with Seattle City Light to mitigate cost burden of utility services on low-income households through the Utility Discount Program. This program ensures that cost will not be a barrier for households to receive services provided by Seattle Public Utilities and Seattle City Light. This program's application process, as well as all outreach material created by Seattle Public Utilities, are translated into a number of languages to serve non-English speakers in Seattle and to lower the barrier to these vital public services.

The Clean City Division of SPU also provides necessary debris clearance in the event of climate emergencies and ensure equitable distribution of resources by utilizing Seattle's Racial Equity Toolkit in program planning and implementation. This toolkit and the division ensure that public litter receptacles, litter abatement routes, and encampment solid waste collection (purple bag program) are equitably distributed throughout the city and are not prioritized in highly resourced communities.

Impacts of Alternative 1: No Action

Police

Alternative 1 will concentrate growth on already existing urban centers. These urban centers could see an increase in demand for police services in these higher growth areas. Alternative 1

represents the lowest increase in demand for Seattle Police Department services but still a slight increase in number of officers.

Fire/Emergency Medical Services

Alternative 1 will concentrate growth on already existing urban centers in Downtown, University District, and Northgate areas and urban centers throughout the city. Current demand for additional aid units in urban centers will increase incrementally and will likely require additional unit to make up apparatus and staff deficits in Area 4. Concentrated growth in Area 4 with multifamily dwellings and less growth in areas will not increase the risk of fire but may increase the number of false alarms that still require dispatch by SFD. Current inspections staff should be adequate in meeting the construction inspections demand.

Parks

Alternative 1 studies the lowest overall growth of the Draft and Final EIS alternatives and would thus result in the lowest amount of required new park acres. The No Action Alternative emphasizes growth in Downtown with the greatest demand for parkland there, followed by areas 1, 5, and 2. The least amount of growth would be in areas 6, 7, and 8 in southwest and southeast Seattle.

Schools

Alternative 1 has the lowest growth overall citywide and the lowest student generation. Most growth would be located in areas 1 and 2 and in the north portion of the city. Most schools have capacity for more students but if the net growth is on top of existing students more school capacity could be needed.

Solid Waste

Alternative 1 will concentrate growth in urban centers which will increase demand for Recology waste hauling service as they are the main hauler of residential customers in these areas. Of the new housing units estimated, roughly 67,000 are estimated to be multifamily customers and the remaining 13,000 are estimated to be single-family solid waste customers. Because multi-family customers have lower overall recycling rates, in order for the City to reach its 70% recycling goal SPU would need to increase its emphasis on education and outreach.

New infill and other residential development will also require additional waste hauling staff to meet the minimum levels of service of weekly garbage and compost collection and bi-weekly recycling collection for residential customers.

130th/145th Station Area

Police

The net population of the area is anticipated to be over 400 over the 20-year planning period. It is anticipated that growth would lead to incremental demand in Area 2.

Fire/Emergency Medical Services

The impacts of this station are not anticipated to increase with minimal zoning changes. However, this area is currently identified as potentially needing additional units at the Bitter Lake fire station to meet minimum service standards. This likely would not require a new station given that nearly all development is targeted at urban centers and the Northgate station is already well equipped with support units in case of multiple calls to the transit station area.

Parks

There would be relatively low additional demand for parkland in the 130th and 145th Street Station Areas under this scenario.

Schools

Alternative 1 produces a small residential growth number and similarly low number of students. The number of students would be spread to three elementary schools near to the stations and one middle school and one high school. It is unlikely to require changes to local school capacities or attendance boundaries.

Solid Waste

Alternative 1 produces a small residential growth number. The number of dwelling units would change the type of service but would not significantly impact levels of service.

Impacts of Alternative 2: Focused

Police

Alternative 2 would add 100,000 in new housing units and 205,000 in population. The 20,000 dwellings above Alternative 1 would largely be added in neighborhood centers, small mixed use nodes Alternative 2 could require a maximum of 1,430 police officers (FTEs) to meet potential additional demand, and most would serve the added growth in centers and newly designated nodes. Most growth though would be in the northern portion of the city in Areas 1 and 2.

Alternative 2 would add 158,000 employees like all other alternatives, with most in downtown neighborhoods. Unlike Alternative 1 a small share of jobs (~10%) would be located in

neighborhoods to serve the greater residential growth. Thus, a slightly higher potential for calls for service in the neighborhoods beyond centers could occur, such as the neighborhood centers.

Fire/Emergency Medical Services

The addition of neighborhood centers in this alternative creates a higher need for fire units and additional staff in Areas 1 and 2. Based on the assessment, current LOS might be met with an additional station that includes at least one engine and one ladder unit. One of these two stations should also receive either an aid or medic car to provide BLS or ALS.

New growth would be developed in accordance with fire codes. Over the planning period to 2044, structures that are retained would continue to age and SFD fire prevention outreach would continue to be important.

City investments in climate resilience in areas with heat islands (see **Exhibit 3.11-52** in Parks evaluation) could reduce the potential for emergency aid calls during extreme heat. The development added to centers and new neighborhood centers as well as the City's tree canopy goals and strategies on public and private lands could support improved climate resilience. There are added neighborhood centers in Areas 6 and 7; although there are relatively fewer neighborhood centers in Area 8 there are centers where growth could be focused.

See **Section 3.2 Air Quality & GHG Emissions** regarding equity and climate resilience and air quality such as buffers from high-volume roads and filtration of dwellings.

Parks

Growth under Alternative 2 would ~~require 1,664 additional acres of~~create more demand for parks across the city. More growth is planned in areas 1 and 2 and so those analysis areas would create the most demand for parks. Growth under Alternative 2 would also result in more demand for parkland in Area 5 than any of the other alternatives.

Schools

Alternative 2 would place the most growth in areas 1 and 2 like Alternative 1. With a higher level of housing and student growth there would be increases in areas 3 and 5-8 compared to Alternative 1. The same level of growth is planned in Centers and Villages, and more growth would be in neighborhood centers across the city, incrementally affecting nearby schools, and less in lands outside these areas of focus. Existing schools may need added classrooms, schools, or attendance boundary changes depending on the rate of growth.

Solid Waste

Alternative 2 would add an estimated 100,000 new housing units in neighborhood centers, small mixed-use nodes, as well as the Downtown Core. About 90% of these units are estimated to be multifamily solid waste customers while the remaining units would be single family

customers. This alternative would also require an increase in education and outreach. It will increase demand for solid waste haulers and would put additional strain on other solid waste services such as illegal dumping and public place litter and recycling. However, the overall capacity of the solid waste system is anticipated to be adequate.

130th/145th Station Area

Police

Under Alternative 2, population would increase by over 2,100 and nearly double the demand for services in the subarea and contribute to more service needs in Area 2.

Fire/Emergency Medical Services

Fire services at the station area would require either a new station or additional units at Bitter Lake to support higher density housing, which results in additional aid calls as well as one additional firefighting unit as is customary at new stations. SFD has identified this area as a hole in service that falls just outside of the minimum response buffer of two different stations; providing additional units at one or both stations could better equip them to handle increased demand.

Parks

Under Alternative 2, growth would contribute to citywide demand for parks. There could be more residents using existing parks in the study area at nearly twice planned as under Alternative 1, and a greater need to improve existing parks to address the greater demand.

Schools

There would be a greater than doubling of expected students, though relatively low compared to Area 2 and citywide growth. There may need to be capacity changes to one or more existing schools or changes to attendance boundaries.

Solid Waste

Alternative 2 produces a larger number of residential units. The number of dwelling units would change the type of service but would not significantly impact levels of service. Multi-family dwellings require more garbage service relative to recycling and composting when compared to single family dwellings.

Impacts of Alternative 3: Broad

Police

Impacts of Alternative 3 on demand for officers would be similar to Alternative 2 with similar growth numbers and need for officers. Most growth would continue to be in centers, but the 20,000 additional residential dwellings would be distributed in a less dense fashion across the NR designation in middle housing types and calls for service may likewise be more diffuse.

Fire/Emergency Medical Services

This alternative will distribute more households throughout the city and will potentially increase needs in Area 1 and Area 2. However, because Area 1 has the highest number of units of any of the service areas, it would be a better use of resources to support aid units in Area 2, Area 4, and Area 8. Additionally, each area of this alternative aggregates to one additional firefighting specific unit depending on the density of the area. This may result in an additional station in South Lake Union to support an additional engine, or possibly increased usage of existing stations.

Investments in climate resilience to address health/emergency services would be likely focused where growth is concentrated in centers, as well as in rights of way and public and private lands (e.g., green infrastructure, tree canopy).

Parks

Alternative 3 distributes a similar amount of growth as Alternatives 2 and 4 but emphasizes growth in areas 1 and 2. Impacts would be similar to those described under Alternative 2.

Schools

Alternative 3 would place the most growth in areas 1 and 2 like Alternatives 1 and 2 and also place a similar amount of growth in centers and villages as these alternatives. The difference in growth is distributed across urban neighborhood areas in each alternative, and there could be incremental demand increases at all schools. Existing schools may need added classrooms, schools, or attendance boundary changes depending on the rate of growth.

Solid Waste

Impacts of this alternative would be similar to Alternative 2 in terms of amount of housing units estimated. However, the distribution of the units is broader across the city and would impact both solid-waste haulers more equally in terms of demand. The number of single-family customers would increase with the increase in in-fill development, but a large proportion of the growth (~68%) would still be in the number of multifamily customers. Education and outreach demand would increase at a slightly lower level than Alternative 2 but would still be required

to meet diversion targets of 70% in residential solid waste. However, the overall capacity of the solid waste system is anticipated to be adequate.

130th/145th Station Area

Not applicable. Under Alternative 3, the station area plan would not be implemented and citywide place types would apply. See the cumulative evaluation under Alternative 3 in Area 2.

Impacts of Alternative 4: Corridor

Police

Impacts of Alternative 3 on demand for officers would be similar to Alternative 2 with similar growth numbers and need for officers. Most growth would continue to be in centers, but the 20,000 additional residential dwellings would be distributed in a less dense fashion across the NR designation in middle housing types and calls for service may likewise be more diffuse.

Fire/Emergency Medical Services

This alternative will distribute more households throughout the city and will potentially increase needs in Area 1 and Area 2. However, because Area 1 has the highest number of units of any of the service areas, it would be a better use of resources to support aid units in Area 2, Area 4, and Area 8. Additionally, each area of this alternative aggregates to one additional firefighting specific unit depending on the density of the area. This may result in an additional station in South Lake Union to support an additional engine, or possibly increased usage of existing stations.

Investments in climate resilience to address health/emergency services would be likely focused where growth is concentrated in centers, as well as in rights of way and public and private lands (e.g., green infrastructure, tree canopy).

Parks

Alternative 4 distributes a similar amount of growth as Alternatives 2 and 3 but emphasizes growth in areas 2, 6, and 8. Impacts would be similar to those described under Alternative 2 with more parkland needed in areas 2, 6, and 8.

Schools

Alternative 4 would place the most growth in areas 1 and 2 like Alternatives 1, 2, and 3, and also place a similar amount of growth in centers and villages as these alternatives. The difference in growth is distributed along corridors in urban neighborhood areas, and there could be incremental demand increases at serving schools. Given the size of attendance

boundaries, there is likely not much difference in increased demand between Alternatives 3 and 4. Existing schools may need added classrooms, schools, or attendance boundary changes depending on the rate of growth.

Solid Waste

Impacts of this alternative would be similar to Alternative 2 in terms of amount of housing units estimated. However, the distribution of the units is broader across the city and would impact both solid-waste haulers more equally in terms of demand. The number of single-family customers would increase with the increase in in-fill development, but a large proportion of the growth (~68%) would still be in the number of multifamily customers. Education and outreach demand would increase at a slightly lower level than Alternative 2 but would still be required to meet diversion targets of 70% in residential solid waste. However, the overall capacity of the solid waste system is anticipated to be adequate.

130th/145th Station Area

Not applicable. Under Alternative 3, the station area plan would not be implemented and citywide place types would apply. See the cumulative evaluation under Alternative 3 in Area 2.

Impacts of Alternative 5: Combined

Police

Alternative 5 would have the greatest demand for additional police services by adding 40,000 more dwellings than Alternative 1 for total new growth of 120,000 or 246,000 new residents. The Alternative maximizes growth in all centers, nodes, corridors, and NR designations. It could require investment in police stations in all areas.

Fire/ Emergency Medical Services

This alternative presents the greatest number of additional dwelling units as well as the highest potential to overload existing fire stations. Growth is spread throughout the city and is maximized as this alternative more evenly distributes higher density housing and increased targeted growth.

Additional stations could be added to fill the holes in service near Area 1 or 2, I-5 corridor, or North Seattle, as well as in Area 5 near South Lake Union. Additionally extra units may be leveraged in Area 8 to support the larger geographic area whose growth may be achieved through smaller multifamily dwellings that are exempt from certain fire suppression measures.

The potential opportunities for investment in climate resilience particularly addressing extreme heat would be greatest (e.g. green infrastructure, tree canopy, etc.). More buildings could be designated for passive cooling and air filtration.

Parks

Demand for additional parkland would be highest under Alternative 5 with 40,000 more dwellings than Alternative 1 and 20,000 more than Alternatives 2 and 3. Alternative 5 matches or exceeds growth of the other alternatives in each area except in Area 5 where growth is slightly lower than Alternative 2.

Schools

Alternative 5 has the greatest population growth and the greatest demand for schools. All areas of the city would see more growth, though still focused in areas 1 and 2. All place types—centers, corridors, and residential districts would see growth and require increased educational services. More than other studied alternatives, existing schools may need added classrooms, schools, or attendance boundary changes depending on the rate of growth.

Solid Waste

This alternative presents the greatest number of additional dwelling units citywide. Growth is spread throughout the city and is maximized as this alternative more evenly distributes higher density housing and increased targeted growth. There would be additional need for outreach and engagement in multifamily residential developments, additional stress on public place litter and recycling and illegal dumping contractors, as well as increases in the number of routes needed to reach minimum levels of service for residential and commercial customers.

Even under the highest growth, the overall capacity of the solid waste system is anticipated to be adequate provided the solid waste plan is implemented. The plan is anticipated to be updated over time as the city grows over the 20-year period.

130th/145th Station Area

Police

Population would equal over 3,400 and more than double the current population, and lead to the highest level of demand in the station area and contribute to overall demand in Area 2.

Fire/Emergency Medical Services

This alternative presents that largest increase in unit needs for the transit stations areas. If an additional aid unit is provided at each of the nearby stations at Bitter Lake and Lake City, SFD can maintain and even improve the service levels of the station area without being forced to cross Interstate-5 which may present a challenge depending on the time of day.

Parks

Demand in the study area would contribute to the higher citywide demand for parks. Locally, Alternative 5 has the most residential growth in 130th Street Station Area. Growth and demand for parks in the 145th Street Station Area is second highest under Alternative 5. There could be increased usage at local parks and a need to increase capacity.

Schools

Under Alternative 5, impacts to schools immediately in the station areas would be similar to and slightly greater than Alternative 2 with a small difference in expected students.

Solid Waste

Under Alternative 5, impacts to solid waste would be similar to and slightly greater than Alternative 2 with a small increase in the number of dwelling units and waste volume.

Impacts of Preferred Alternative

Note: The impacts analysis for the Preferred Alternative was added since the Draft EIS.

Police

Similar to Alternative 5, the Preferred Alternative would have the greatest demand for additional police services by adding 40,000 more dwellings than Alternative 1 for total new growth of 120,000 or approximately 246,000 new residents. The Alternative maximizes growth in all regional centers, urban centers, neighborhood centers, corridors, and urban neighborhood designations. It could require investment in police stations in all areas. Areas 1 and 2 would have the most residential growth.

Fire/ Emergency Medical Services

This alternative presents the greatest number of additional dwelling units as well as the highest potential to overload existing fire stations. Growth is spread throughout the city with most in Areas 1 and 2.

Additional stations could be added to fill the holes in service near Area 1 or 2, I-5 corridor, or North Seattle, as well as in Area 5 near South Lake Union. Additionally extra units may be leveraged in Area 8 to support the larger geographic area whose growth may be achieved through smaller multifamily dwellings that are exempt from certain fire suppression measures.

The potential opportunities for investment in climate resilience particularly addressing extreme heat would be greatest (e.g. green infrastructure, tree canopy, etc.). More buildings could be designated for passive cooling and air filtration.

Parks

Demand for additional parkland would be like Alternative 5 and would have 40,000 more dwellings than Alternative 1 and 20,000 more than Alternatives 2 and 3. The Preferred Alternative matches or exceeds growth of the other alternatives in each area except in Area 5 where growth is slightly lower than Alternative 2.

Schools

Along with Alternative 5, the Preferred Alternative has the greatest population growth and the greatest demand for schools. All areas of the city would see more growth, though still focused in Areas 1 and 2. All place types—centers, corridors, and residential districts would see growth and require increased educational services. More than Alternatives 1-4, and similar to Alternative 5, existing schools may need added classrooms, schools, or attendance boundary changes depending on the rate of growth.

Solid Waste

This alternative presents the greatest number of additional dwelling units citywide similar to Alternative 5. Growth is spread throughout the city and is maximized as this alternative more evenly distributes higher density housing and increased targeted growth. There would be additional need for outreach and engagement in multifamily residential developments, additional stress on public place litter and recycling and illegal dumping contractors, as well as increases in the number of routes needed to reach minimum levels of service for residential and commercial customers.

Even under the highest growth, the overall capacity of the solid waste system is anticipated to be adequate provided the solid waste plan is implemented. The plan is anticipated to be updated over time as the city grows over the 20-year period.

130th/145th Station Area

Police

Population growth in the 130th Street Station Area would equal about 3,245, which would about double the current population. This would lead to the second highest level of demand in the station area and contribute to overall demand in Area 2.

Fire/Emergency Medical Services

This alternative presents that largest increase in unit needs for the transit stations areas. If an additional aid unit is provided at each of the nearby stations at Bitter Lake and Lake City, SFD can maintain and even improve the service levels of the station area without being forced to cross Interstate-5, which may present a challenge depending on the time of day.

Parks

Demand in the study area would contribute to the higher citywide demand for parks. Locally, The Preferred Alternative has the most residential growth in 130th Street Station Area. Growth and demand for parks in the 145th Street Station Area is second highest under the Preferred Alternative. There could be increased usage at local parks and a need to increase capacity.

Schools

Under the Preferred Alternative, impacts to schools immediately in the station areas would be similar to and slightly greater than Alternative 2 with a small difference in expected students.

Solid Waste

Under the Preferred Alternative, impacts to solid waste would be similar to and slightly greater than Alternative 2 with a small increase in the number of dwelling units and waste volume.

3.11.3 Mitigation Measures

Incorporated Plan Features

The action alternatives would update the Parks and Recreation Element of the Comprehensive Plan, which would result in refreshed policies. The POS Plan is being updated in parallel with the Comprehensive Plan, and it is anticipated that the plan will address levels of service and priorities for implementation.

The City is updating its Comprehensive Plan including its public services policies and coordinating with service providers regarding growth estimates.

Compact growth in centers under all alternatives and in other areas of focus like centers and corridors in Alternatives 2 and 4 could result in more efficient service delivery. More diffuse growth in urban neighborhood areas in Alternatives 3 and 5 and the Preferred Alternative could distribute the demand more incrementally and locate more housing near existing infrastructure like schools, parks, and fire stations.

Regulations & Commitments

Police

- SPD has Crime Prevention Coordinators (CPCs) who are experts in crime prevention techniques. SPD also advises on natural surveillance and other techniques to provide design of development and landscaping that allows for visibility and increase safety.

- SPD has developed Micro Community Policing Plans (MCPP) with community engagement and considering crime data to help direct police services to address the individual needs of each community.
- SPD has a Professional Standards Bureau to guide Seattle's Police Reform. Goals include:
  - Reduce Crime and Disorder: The Seattle Police Department strives to move beyond just responding to crime after it has occurred to proactively working toward reducing the opportunity for and disorder associated with criminal activity.
  - Service Excellence: Enforcing the law is only a portion of what the Seattle Police Department does each day. Providing service to individuals happens much more frequently than arrests. To this end, the men and women of the Seattle Police Department are continuously looking for better and more effective ways to advance policing.
  - Honor and Professionalism: Public trust, Courtesy, and Respect remain a top priority for the Department. All SPD personnel understand that this is a shared responsibility and is critical in building strong relationships with the communities of Seattle.
  - Business Efficiency: SPD has a duty to administer the resources granted to it in a responsible and effective manner and is always looking toward implementing best business practices to provide effective and skillful police services.
  - Data Driven Policies and Practices: Effective, modern policing is grounded in agile, data-driven strategies. SPD is committed to using multi-disciplinary solutions for improving the livability of the City.

Fire/Emergency Medical Services

- The Seattle Fire code specifies that any street improvements must be consistent with the Seattle Fire Code Section 503 and Appendix D, which address fire apparatus access roads and minimum standards for public right of way design to not inhibit response.
- Seattle Fire Code Section 9 also specifies that buildings of certain numbers of housing and commercial units that will be required to meet targeted growth require means of egress, sprinkler systems, and other fire protection measures. The code also specifies certain characteristics of each of these fire protection measures in new development and inspections on existing housing and commercial spaces.
- Response time commitments are available under **Response Time** in **Section 3.11.1** or as follows:
  - Call Processing Time: 60 seconds for phone answered to first unit assigned for 90% of calls.
  - Fire Response Time: Arrival within 4 minutes for the first-arriving engine at a fire for 90% of calls, and arrival within 8 minutes of the full first alarm assignment of 15 firefighters, for 90% of calls.
  - Basic Life Support: Arrival within 4 minutes of the first medical unit with two EMTs, for 90% of calls.
  - Advanced Life Support: Arrival within 8 minutes for 90% of call
- Seattle Fire has committed to limiting the number of dispatches/runs per unit to 2500 annually based on national standards and regulations (Haskell, McAuslan, 2023). This is to

ensure that staff are not overburdened, units remain in good condition, and overburdened units can be identified.

Parks

- The Seattle Land Use Code (Seattle Municipal Code Title 23) contains development regulations, including standards governing the design and placement of exterior site and building illumination and recreation/open space. The LUC also provides for SPR review when subdivisions over a certain size are proposed.
- The Seattle Shoreline Master Program requires shoreline public access for development that creates a demand.

Schools

- Ongoing Seattle School District capital facilities management planning would be required to address increases in student population. The Seattle School District prepares capital plans and projects are funded by levies.

Solid Waste

- Seattle Solid Waste develops a Solid Waste Management Plan at consistent intervals to ensure that departmental policies align with their stated goals. The most recent draft update to this plan commits to a zero-waste vision in which Seattleites produce and use less to ensure reduced impacts to human health and the environment.
- Seattle Public Utilities produces strategic business plans every 5 years which include solid waste elements and ways in which SPU can support the Solid Waste Division through investments to reach its stated goals from the Solid Waste Management Plan.
- The City produces several resources on specific hazardous waste, single use plastics, food waste, and waste composition studies which create regulations and policies that limit environmental impacts from pollution, microplastics entering into the food system, and waste disposal. These studies have culminated in specific policies such as the single use plastic bag ban, prioritization of durables (metal or reusable tableware) in restaurants, and a number of pilot projects aimed at creating more opportunities to recycle and compost in all parts of the city.

Other Potential Mitigation Measures

Police

SPD could update its MCPP described under “Incorporated Plan Features” or create updated police service programs to engage the community in police services that equitably and justly meet community needs.

Fire/Emergency Medical Services

Additional fire/emergency medical services mitigation measures could include:

- SFD could explore options to decrease call times through new station placement strategies that limit East/West travel which has historically been challenging for fire units during busier times of day.
- SFD could explore smaller, more nimble fire units that are better equipped to navigate Seattle's complex topography to decrease response times while still ensuring SFD's excellent standard of service for emergency medical and fire response.
- SFD could convert peak aid units that are available at certain times to full time aid units.
- SFD could add aid units in underserved areas.
- **130th/145th Station Area:** If an additional aid unit is provided at each of the nearby stations at Bitter Lake and Lake City, SFD can maintain and even improve the service levels of the station area ~~and~~ while avoiding crossing Interstate-5 at congested times of the day.

Parks

- The City could explore a population density or access-based level of service approach given the urban nature of the city as identified in the ~~draft~~ Parks and Open Space Plan ~~March~~ May 2024.
- The City could add additional or improve existing park space including:
  - Expanding existing parks or adding capacity on existing parks (e.g., expanded play or sports facilities),
  - Creating linear parks and trails,
  - Increasing tree canopy coverage in rights-of-way or public parks and open space to reduce urban heat island effects,
  - Developing recreation facilities on building rooftops to provide sports courts, athletic fields, off-leash dog areas, etc.,
  - Developing community gardens (permitted on some rooftops in individual zones) as a way to provide open space and urban agricultural use,
  - Increasing frequency of maintenance to offset an increase in park usage.
- The City could implement a parks impact fee to help pay for the development of new park land if needed in the future.
- The City could also explore transportation to and from parks and potentially increase connectivity between parks in areas of high equity opportunity.

Schools

- The City could implement a school impact fee to help pay for the development of new classrooms if they are needed in the future.
- The City could help identify interim uses for existing underutilized classrooms so that the school district can hold onto them in case they are needed in the future.
- The City could incentivize provision of public schools in centers in vertical formats, where new schools are needed. The City could also allow for greater heights at existing school

locations where demand increases. Goals would be to protect recreation and tree canopy while allowing for more student classroom capacity.

- The City could update development standards and review processes for new schools in order to make it easier to add classrooms or build new schools if they are needed in the future.
- As part of development standards for new place types such as neighborhood centers and corridors, the City could enhance street crossing including walking routes to schools in areas with added housing.
- The City could identify specific objectives to assist Seattle Public Schools in acquiring and developing new schools if needed.

Solid Waste

Additional solid waste mitigation measures may be needed to help the City reach its goals of 70% diversion of waste to recycling and compost. These measures are as follows:

- Increasing budget for education and outreach services for multi-family residents.
- Establishing more significant penalties for those who do not adhere to recycling and composting standards while increasing financial benefits for households and multi-family residents who opt for recycling and compost over landfill waste disposal.
- Require specific standards in solid waste hauling contracts to protect employees from adverse health impacts of their work during extreme weather events.

3.11.4 Significant Unavoidable Adverse Impacts

Police

There will be an increase in population and jobs and an increase in demand for police services. However, there are mitigation measures to invest in resources to address needs and provide adequate services.

Fire/Emergency Medical Services

It is anticipated that increased demand for fire/emergency medical services can be accommodated due to ~~the~~ changes in staffing for fire prevention education, increased capacity at station facilities, and either redistributing or increasing the number of units at each station. Consequently, no significant unavoidable adverse impacts are to be expected.

Parks

All alternatives will exceed the existing level of service and increase demand for parks and recreation facilities. With mitigation (adding parks, making better use of existing parks, or ~~updating~~ implementing the updated parks LOS) significant adverse impacts can be avoided.

Schools

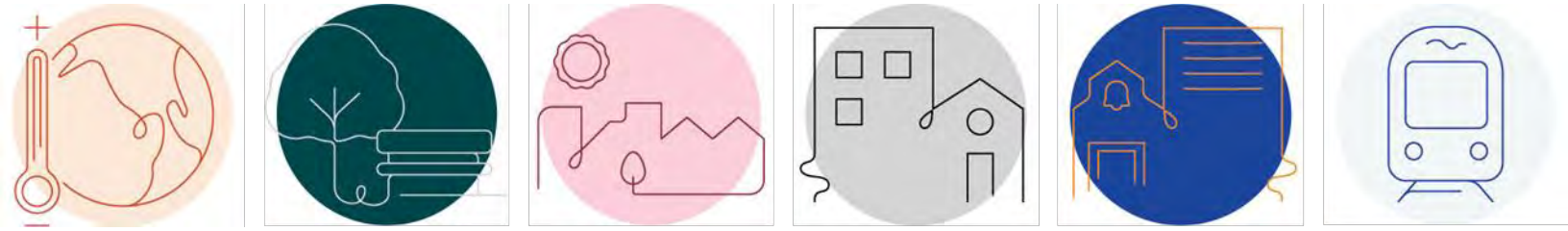
All studied alternatives would result in increases in students. This could require additional school capacity unanticipated in current district plans. However, it is anticipated that Seattle Public Schools could respond to any new growth that may occur through regular capital planning and coordination. Consequently, no significant unavoidable adverse impacts are anticipated.

Solid Waste

It is anticipated that Seattle Solid Waste will be able to accommodate expected increases in solid waste service through regular contract renegotiation and ongoing maintenance and upkeep of capital facilities. Consequently, no significant adverse impacts are anticipated.

Intentionally blank

3.12 Utilities



Seattle City Light. Source: City of Seattle, 2023.

This section evaluates the potential impacts to utilities that may result from the five alternatives. Utilities evaluated in this section include the public water system, the wastewater and drainage system, and the electrical system.

Thresholds of significance utilized in this impact analysis include:

- Impacts that would be inconsistent with plans for future utility improvements, development, or growth.
- Impacts that would require major unplanned capital improvements for the utility to serve new development.

3.12.1 Affected Environment

Citywide

Water

Seattle Public Utilities (SPU) provides drinking water to approximately 1.5 million people living in Seattle and surrounding communities in western King County and portions of southern Snohomish County. The city's water supply comes primarily from surface water reservoirs on the Cedar River, which supplies 60 to 70%, and South Fork Tolt River, which supplies the remainder. SPU also manages a small wellfield that can be used to supplement the surface water sources if needed (SPU 2019a).

A roughly equal amount of water is provided to retail and wholesale customers through approximately 1,820 miles of transmission and distribution lines, as shown in **Exhibit 3.12-1**. SPU's water system has an estimated yield of 172 million gallons per day (mgd), although actual consumption has been much less and declining over time, with per capita consumption 44% less in 2019 than in 1990. Over the past five years, total consumption has averaged about 121 mgd (SPU 2019a).

SPU does not have any planned efforts to increase water supply prior to 2060. Despite an anticipated household growth rate of 18% in its retail service area and 29% in its full and partial wholesale customers between 2016 and 2040, SPU anticipates that total demand is forecast to remain relatively flat due to continued efforts to conserve water and changes to its wholesale water customers (SPU 2018). Current capital investments for SPU include those for maintenance of existing infrastructure including dams, watermain rehabilitation in the distribution system, seismic improvements, and ensuring the water system's resiliency under climate change.

Exhibit 3.12-1. Seattle Regional Water Supply System

Source: SPU, 2019a.

Wastewater & Drainage

SPU manages wastewater and drainage systems in Seattle, which include the combined sewer system, the sanitary sewer system, and the stormwater drainage system. The City contains three different types of areas: the combined sewer area (with only combined sewer systems), separated sewer areas (with sanitary sewer and stormwater drainage systems), and partially separated sewer areas (with sanitary sewer and stormwater drainage systems, where some rainwater still goes to the sanitary sewer), each covering about one-third of the city as shown in **Exhibit 3.12-2**. The King County Wastewater Treatment Division operates the West Point treatment plant—one of the County's three regional wastewater treatment plants—in addition to four combined sewer overflow (CSO) treatment facilities within the city of Seattle (King County 2022) and the wastewater trunkline system that serves Seattle. The majority of wastewater collected from within Seattle is treated at the West Point plant, which is supported by the Brightwater plant near Woodinville if needed (King County 2023a, King County 2023b).

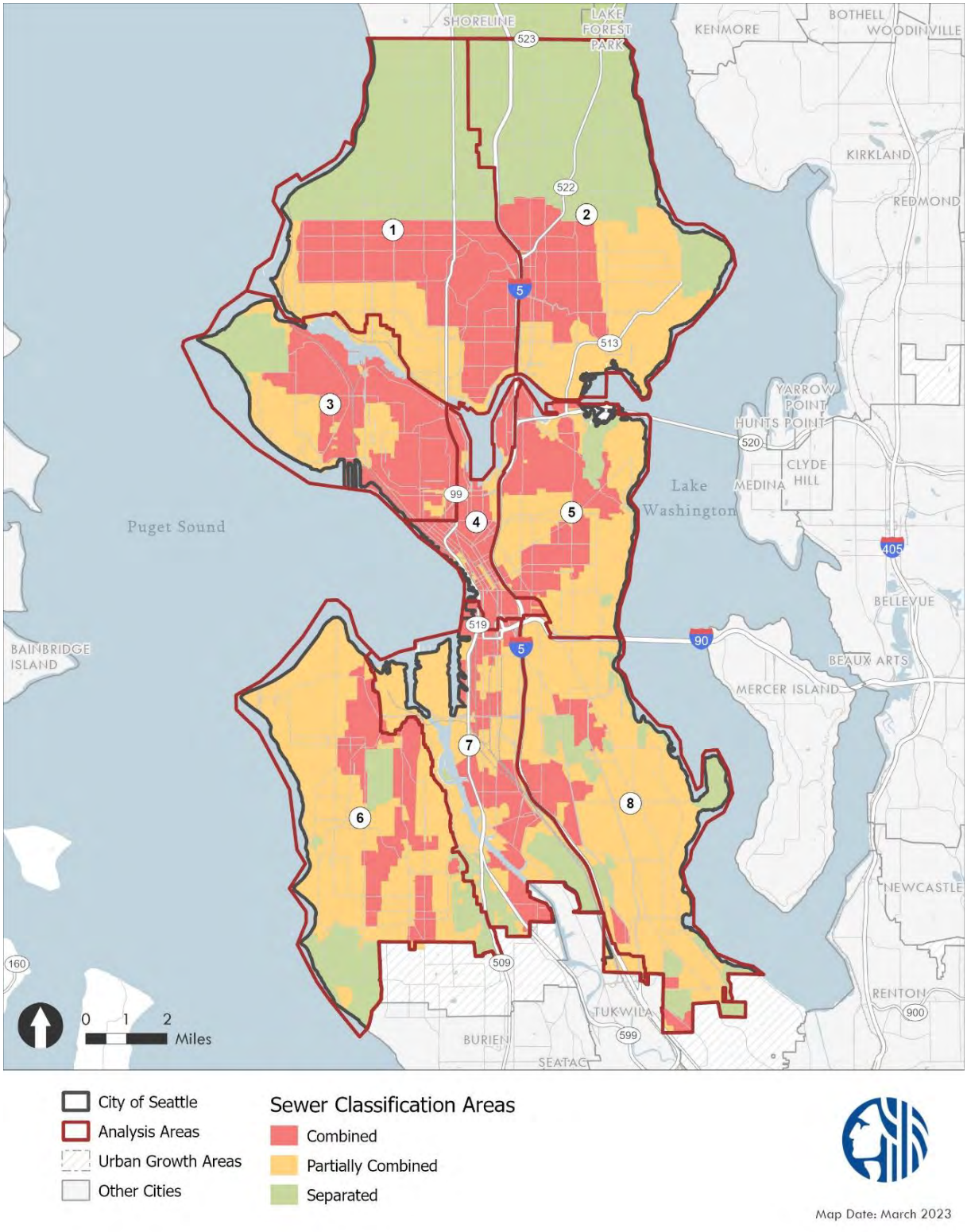
The combined sewer system is the oldest system conveying wastewater and drainage in Seattle, with infrastructure 100 years old or more in places (SPU 2023a). The combined sewer system collects wastewater from residents and businesses along with stormwater runoff from rooftops, yards, and streets into the same pipes, where it is then conveyed to the treatment plant. During periods of heavy rain, the system can overflow into waterbodies such as Lake Washington and Elliott Bay. While CSOs prevent wastewater treatment plants from being overwhelmed and prevent the wastewater system from backing up into roads and buildings, they contribute pollutants to receiving waterbodies. This degrades water quality, which impacts the aquatic life and habitat within these waterbodies and inhibits recreational opportunities.

In the separated sewer system wastewater from homes and businesses is collected through a separate set of pipes than stormwater. Wastewater is sent to the treatment plant while drainage collected from rooftops, yards, and streets is conveyed to waterbodies. Pollutants picked up by stormwater from rooftops and streets can impact water quality and the aquatic life in receiving waterbodies.

In the partially separated sewer system, stormwater runoff from the rooftops of older construction is collected along with wastewater from homes and businesses and conveyed through the wastewater system to the treatment plant. As in the separated system, stormwater runoff from yards, streets, and new development is conveyed to waterbodies.

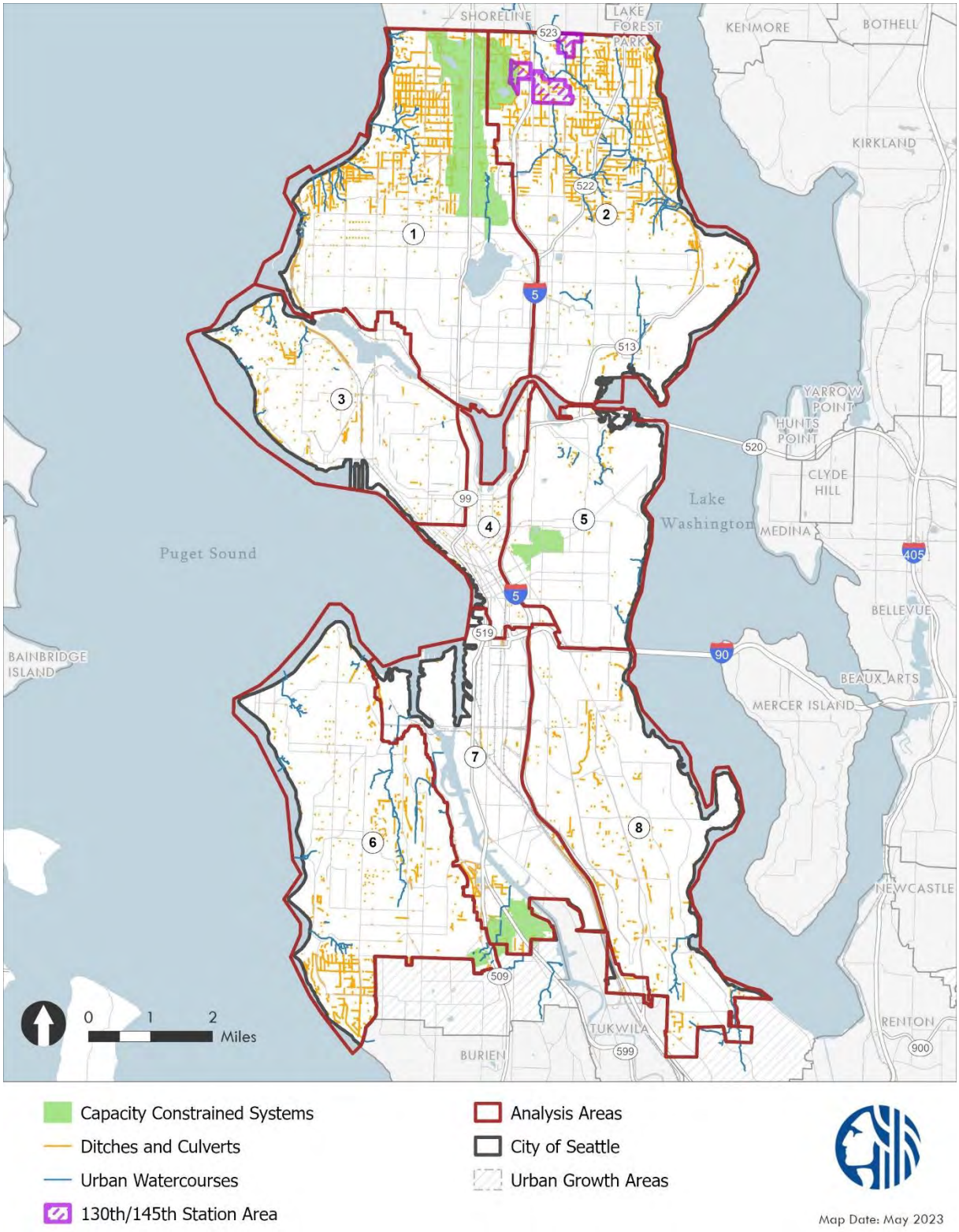
While the vast majority of SPU's drainage system is piped, Seattle has areas that are served by a predominantly 'informal' drainage system, particularly north of 85th Street and in the southwest corner of Seattle. These areas include blocks with no, or only limited drainage infrastructure and several miles of ditch and culvert systems. According to Seattle's Stormwater Code (Seattle Municipal Code [SMC] Title 22, Subtitle VIII) ditch and culvert systems are considered capacity constrained, meaning they have inadequate capacity for existing and anticipated stormwater loads. **Exhibit 3.12-3** shows the wastewater and drainage systems considered capacity constrained.

Exhibit 3.12-2. Drainage Areas by Type



Source: City of Seattle GIS, 2023; Parametrix, 2023.

Exhibit 3.12-3. Capacity Constrained Wastewater and Drainage Systems



Source: City of Seattle GIS, 2023; Parametrix, 2023.

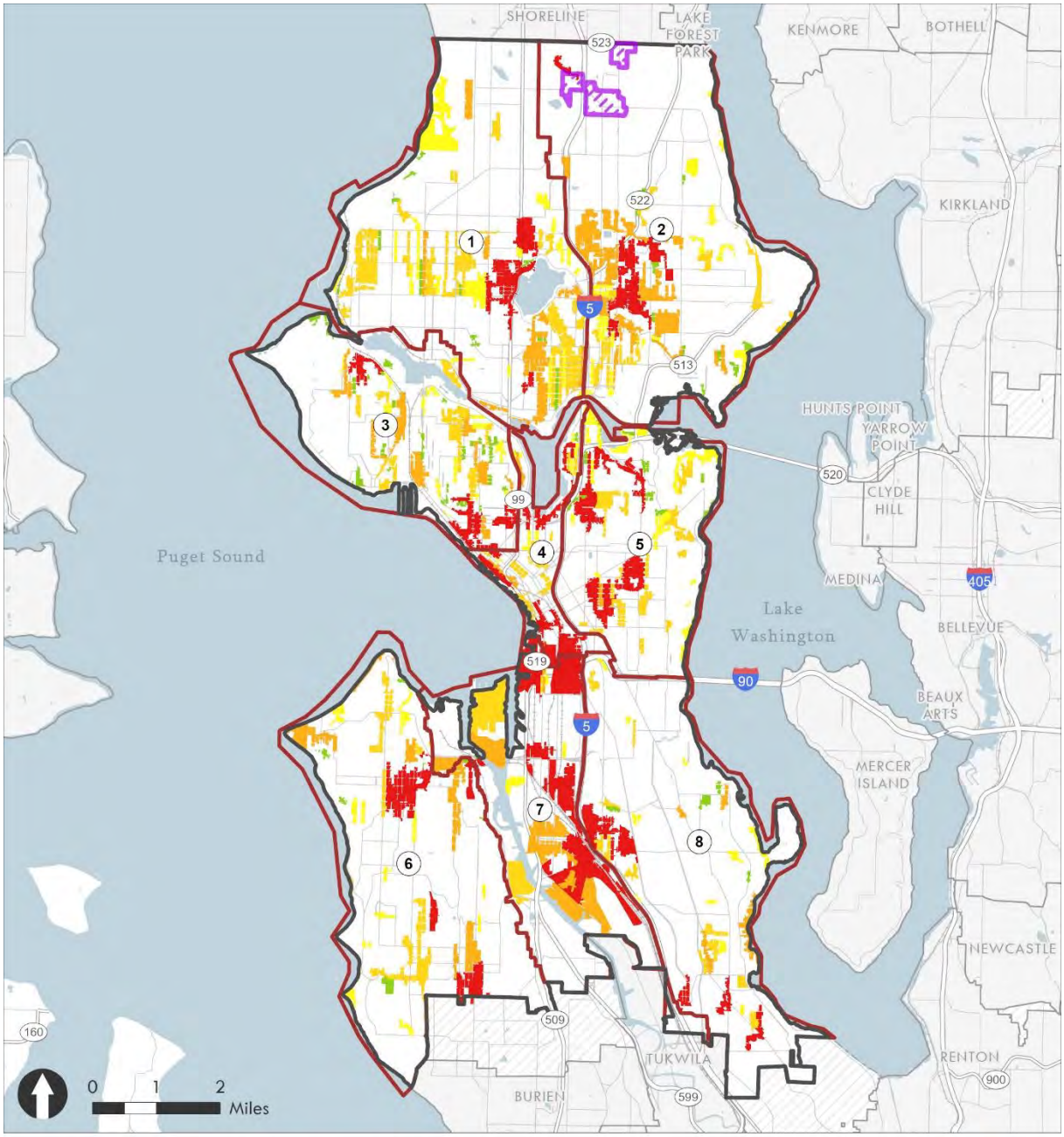
Development must meet certain requirements for flow control and possibly treatment depending on the characteristics of the project and the type of system to which it discharges or conveys runoff. Development within the combined sewer area is subject to flow control requirements, while projects within creek basins, discharging to wetlands, or conveying runoff through ditch and culvert systems are subject to both flow control and water quality treatment requirements.

In 2019 SPU published a Wastewater System Analysis (WWSA) that identifies areas at risk due to limited wastewater system capacity, which can cause sewer overflows through maintenance holes or backups into homes or businesses (SPU 2019b). In 2020, SPU completed a Drainage Systems Analysis (DSA) that identified areas at greatest risk from limited drainage system capacity, which could cause flooding in the right-of-way or onto private property (SPU 2020). These analyses simulated SPU's wastewater and drainage system performance under different design storms that represented differing amounts of rainfall in a 24-hour period and calculated risks based on the likelihood and consequences of flooding and sewer overflows, as well as areas of racial and socioeconomic disparity. The WWSA and DSA both used the best available growth and climate change projections at the time to assess how the identified risks might be impacted in the future.

The WWSA and DSA were developed to assess risks associated with system capacity citywide in order to prioritize SPU investments in sewer and drainage capacity improvements in the future through the Shape Our Water planning effort. They were not developed to inform development decisions. Both WWSA and DSA used modeling to simulate system performance at the citywide scale and risk areas identified have not necessarily been confirmed by real-world instances of flooding, sewer overflows, or sewer back-ups. The WWSA and DSA both used conservative assumptions to identify risks with the assumption that additional ground-truthing would be necessary before making decisions on specific capital improvements. This approach may have resulted in an overprediction of areas at risk due to sewer and drainage capacity. **Exhibit 3.12-4** shows areas with higher risk due to limited wastewater system capacity**. Exhibit 3.12-5** shows areas with higher risk due to limited drainage system capacity.

In addition, the WWSA and DSA modeled sewer and drainage system capacity under future conditions for the 2035 planning horizon and ran simulations to evaluate the potential changes in flooding, sewer overflows, and sewer back-ups caused by changes in impervious cover, stormwater code compliance, sea level rise, and more frequent and extreme rainfall events. The WWSA found that "Citywide, the percent of surcharged pipe length increased slightly from 30% under existing conditions to 33% under future conditions for the 5-yr, 24-hour storm. Simulated MH [maintenance hole] flooding increased to a lesser degree from 6% under existing conditions to 7% under future conditions (SPU 2019b)." The DSA found that "Redevelopment can result in additional impervious surface areas which can increase peak flows and affect conveyance capacity. Due to the City's stormwater code requirements, new or replaced impervious surface areas associated with development may require flow control which mitigate the increased flows and sometimes decrease existing flows (SPU 2020)."

Exhibit 3.12-4. Wastewater System Capacity Priority Areas



Wastewater System Capacity Priority Areas

Relative risk categories

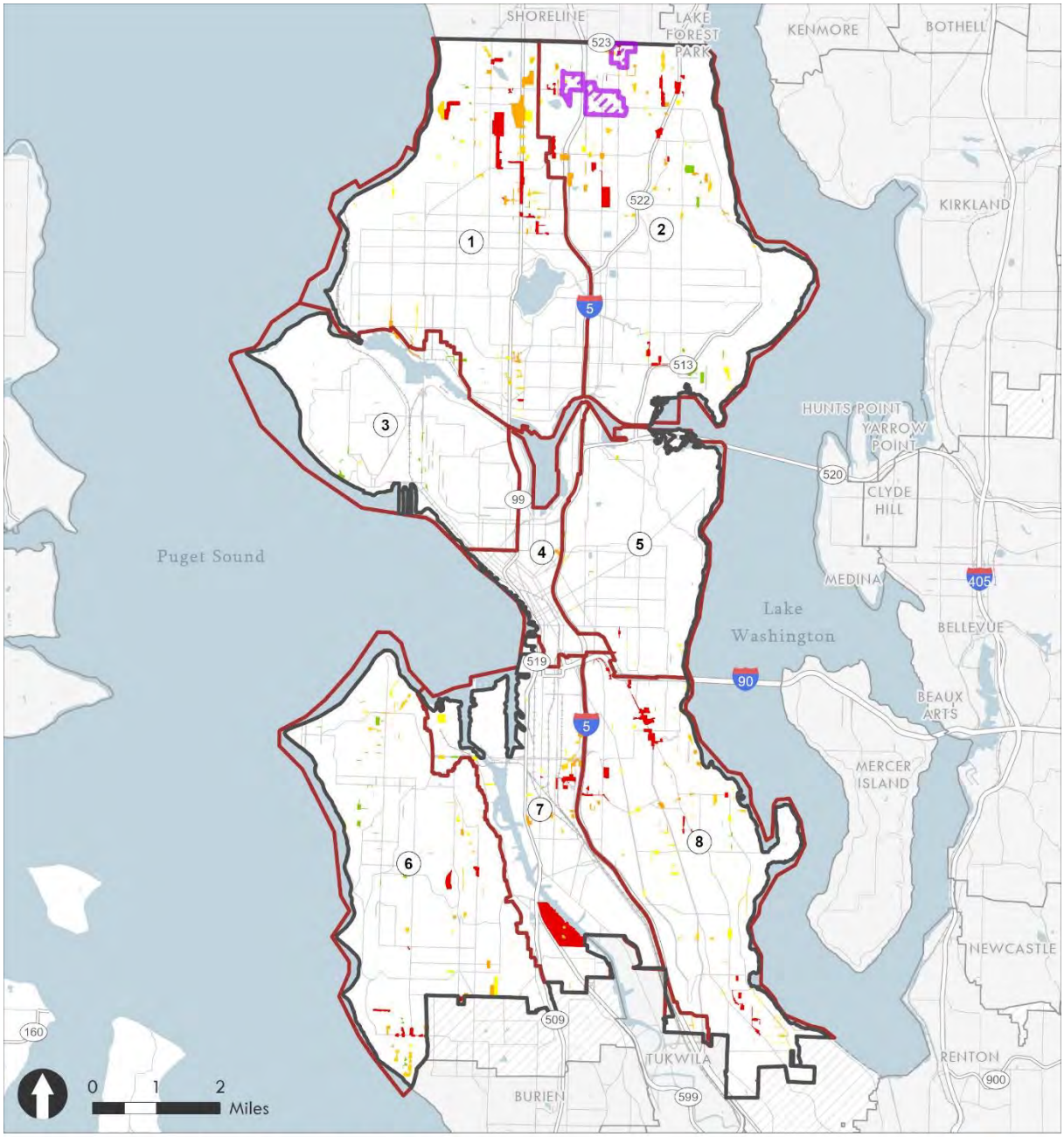
- Critical
- High
- Medium
- Medium-low
- Low

- 130th/145th Station Area
- City of Seattle
- Analysis Zones
- Urban Growth Areas

Map Date: June 2023

Source: SPU, 2019b; Parametrix, 2023.

Exhibit 3.12-5. Drainage System Capacity Priority Areas



Source: SPU, 2020; Parametrix, 2023.

SPU's major capital investments currently include several projects to restore creeks, reduce flooding, improve sewer capacity, increase green stormwater infrastructure, and reduce CSOs. SPU's largest CSO control project is the Ship Canal Water Quality Project, which is being done in partnership with King County, and will prevent an average of 75 million gallons of polluted stormwater and sewage from entering waterways each year (SPU 2023b). SPU is also currently developing a plan for Seattle's water future, called Shape Our Water: A 50-year Plan for Seattle's Water Resilience.

Also in 2019, King County published the Treatment Plant Flows and Loadings Study, which evaluates the capacity of its wastewater treatment plants in terms of handling overall volume of wastewater and stormwater flow in addition to the amount of organic and solids load (King County 2019). In its evaluation, the County used population estimates and projections based on 2013 PSRC forecasts, adjusted for the higher growth rate the region experienced between 2010 and 2016. Based on the results, the West Point treatment plant is projected to be able to handle maximum month flow until 2050 but is already reaching capacity for maximum month loadings. In addition, the County will need to optimize treatment plant operations and ultimately invest in technical modifications to comply with the Puget Sound Nutrient General Permit, which became effective in January 2022. This may put further constraints on treatment plant capacity.

King County has capital projects underway at the West Point treatment plant to improve the reliability of power supply, replace and upgrade the raw sewage pump system, and construct seismic upgrades. King County has completed a number of CSO control projects in Seattle in recent years, and in addition to the Ship Canal Water Quality Project in Seattle, is working on a new CSO treatment facility in Georgetown and a 1.25-million-gallon storage facility for wastewater and stormwater in South Park. The County is also undergoing an effort to improve the capacity of the Thornton Creek sewer pipe, evaluating alternatives to reduce the infiltration and inflow of groundwater and stormwater into the pipe to reduce the risk of overflows and water quality impacts in the Thornton Creek basin.

Electricity

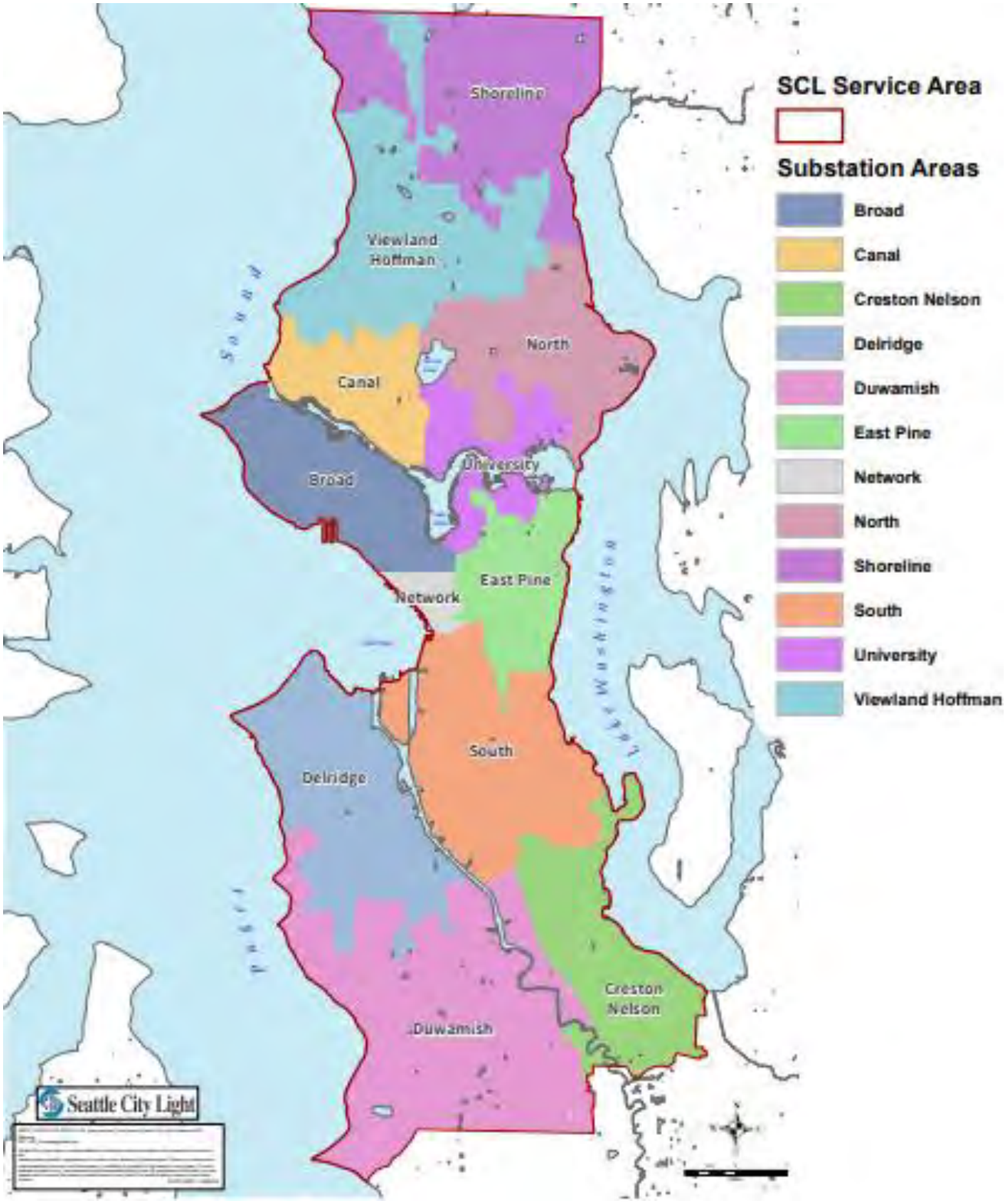
Seattle City Light (SCL) provides electrical power to homes and businesses in Seattle in addition to customers in communities north and south of the city. **Exhibit 3.12-6** shows the SCL service area. In 2020, SCL provided over 8.6 million megawatt-hours of power to over 425,000 residential customers and over 50,000 commercial and industrial customers (SCL 2021). A significant portion of SCL's power is generated by the utility's own hydroelectric facilities, namely the Ross, Gorge, and Diablo dams on the Skagit River north of Seattle and the Boundary Dam on the Pend Oreille River in northeast Washington. The rest of the power is purchased through other sources, including over a third of power needs from the Bonneville Power Administration (SCL 2021).

Within Seattle, SCL operates 12 substations—the newest being the Denny Substation built in 2018—that distribute power throughout the city, as shown in **Exhibit 3.12-7**. These substations lower the voltage of electricity from the high-voltage 115- and 230-kilovolt transmission lines before transferring it to the overhead and underground neighborhood distribution lines. In all, SCL manages over 2,300 miles of distribution circuit (SCL 2021). There is also a small but growing number of decentralized energy production sources, such as private solar panel arrays on residential or commercial buildings. These arrays can help supplement electrical power from SCL's system and, where large enough, can contribute electrical power back into the system.

Exhibit 3.12-6. Seattle City Light Service Area

Source: SCL, 2021.

Exhibit 3.12-7. Seattle City Light Substation Service Areas



Source: SCL, 2021.

SCL conducted an assessment in 2022 to examine the high-level impacts of electrification of buildings, transportation, and commercial and industrial applications within its service area in addition to population and commercial growth. The Seattle City Light Electrification Assessment (SCL 2022a) analyzed the impacts of electrification, such as the adoption of electric vehicles and building heating and cooling systems, under three different electrification scenarios: a Moderate Market Advancement scenario where electrification occurs based on past trajectories, a Rapid Market Advancement scenario consistent with the goals and policies of plans such as the Seattle Climate Action Plan, and the Full Adoption of Electrification Technologies scenario where all technologies would be fully electric by 2030, consistent with Seattle's Green New Deal. Each scenario included the addition of 65,000 housing units and over 69 million square feet of commercial development over the study period (SCL 2023a).

As shown in **Exhibit 3.12-8**, under all scenarios, the percent of energy use by residential and commercial uses drops relative to industrial and, particularly, transportation uses. This suggests that the adoption of electrification technologies poses a greater concern to system capacity than population growth. The study concluded that, throughout the year, SCL's electrical system has capacity available to accommodate electrification efforts—approximately 22 Terawatt hours (TWh)—although peak load demand could exceed the capacity of portions of the grid during certain times of the year as electrification efforts advance. For example, the study found that under the Full Adoption scenario winter and summer peak loads would exceed the existing system capacity in 2030 without mitigating strategies or technologies to reduce peak demand (SCL 2022a).

Exhibit 3.12-8. Comparison of Electrical Use Under Electrification Scenarios

End Use	Year 2020 Baseline TWh1 / % of Total	Year 2042 Moderate Market Advancement TWh / % of Total	Year 2042 Rapid Market Advancement TWh / % of Total	Year 2042 Full Adoption[2] TWh / % of Total
Commercial	4.52 / 49.5%	5.85 / 44.5%	6.10 / 37.6%	6.48 / 32.8%
Industrial	0.90 / 9.8%	1.38 / 10.5%	1.72 / 10.6%	2.98 / 15.1%
Residential	3.68 / 40.2%	4.89 / 37.2%	5.14 / 31.6%	5.65 / 28.6%
Transportation	0.04 / 0.5%	1.03 / 7.9%	3.28 / 20.2%	4.63 / 23.4%
Total TWh	**9.15 / 100%**	**13.16 / 100%**	**16.25 / 100%**	**19.74 / 100%**

Notes: 1) TWh = Terawatt hours; 2) In the Electrification Assessment report the Full Adoption scenario was analyzed between 2030 and 2042, assuming full electrification begins in 2030, and not compared against the 2020 baseline.
Source: SCL, 2022a.

In 2005, SCL became the first electric utility in the country to become carbon neutral and has maintained its carbon neutral status ever since. SCL continues to invest in energy conservation efforts. These include grid modernization technologies such as microgrids, automation, and demand response. SCL is also investing in public and private charging stations and working

with partner agencies to provide infrastructure and incentives for the electrification of public transit, commercial and government fleets, and personal modes of transportation (SCL 2023b).

Analysis Areas

The presence and nature of utility facilities is primarily consistent between the EIS planning areas, particularly for water and electricity. The primary differentiators for utilities between areas concerns wastewater and drainage systems, which are highlighted below.

Area 1: NW Seattle

Area 1 includes combined, separated, and partially separated wastewater and drainage systems. The northern portion of Area 1 contains a large proportion of streets with informal drainage systems and includes large areas served by ditch and culvert systems, including the capacity constrained Densmore drainage basin in which there are several under capacity drainage ditches and pipes. Short segments of capacity constrained drainage ditches are located in the Ballard and Fremont neighborhoods as well. There are some areas with medium to high risk due to wastewater system capacity with some areas identified as critical risk on the northeast side of Green Lake.

Area 1 is generally covered by the Viewland Hoffman and Canal SCL substation areas.

Area 2: NE Seattle

Area 2 includes combined, separated, and partially separated wastewater and drainage systems. The northern portion of Area 2 includes the greatest proportion of streets with informal drainage systems and areas served by ditch and culvert systems, particularly within the Thornton Creek watershed, in which there are a number of under capacity drainage ditches and pipes (see **Exhibit 3.1-7 Regulated Stream and Lake Watersheds** in **Section 3.1 Earth & Water Quality**). There are some areas with medium, high, and critical risk due to wastewater system capacity mostly within the southwest quadrant of Area 2.

Area 2 is generally covered by the Viewland Hoffman, North, and University SCL substation areas.

130th/145th Study Area

The 130th/145th Study Area is within the Thornton Creek watershed and partially within the Densmore drainage basin, which is considered capacity constrained. In addition, there are numerous streets within the study area with ditch and culvert systems, also considered capacity constrained. This area is indicated as very low risk due to wastewater system capacity.

The 130th/145th Study Area is covered by the Viewland Hoffman substation area.

Area 3: Queen Anne/Magnolia

Area 3 includes the Ballard Interbay Northend Manufacturing Industrial Center. It is primarily served by a combined wastewater and drainage system, with smaller areas served by partially separated and separated systems in the southern area of the Magnolia neighborhood and Discovery Park, respectively. Most streets are served by formal drainage systems, and there are very few drainage pipes listed as under capacity. There are some areas indicated as medium to high risk due to wastewater system capacity throughout the Area 3, with some areas indicated as critical risk within the Lower Queen Anne neighborhood.

Area 3 is covered by the Broad SCL substation area.

Area 4: Downtown/Lake Union

Area 4 includes the Downtown and South Lake Union neighborhoods that include some of the city's most densely populated areas. Wastewater and stormwater in Area 4 is conveyed almost wholly through the combined system, though there are small areas where stormwater is conveyed through the partially separated system. There are areas with medium to high risk due to wastewater system capacity throughout, with the Pioneer Square and International District neighborhoods indicated as critical risk.

Area 4 is generally covered by the Network, Broad, University SCL substation areas.

Area 5: Capitol Hill/Central District

Area 5 is served by both combined and partially separated wastewater and drainage systems, with the area including the Washington Park Arboretum served by a separated system. Nearly all streets are served by a formal drainage system, and there are very few drainage pipes listed as under capacity. The area is primarily indicated as very low risk due to wastewater system capacity except for the Madison Valley and areas in the northeast quadrant of the area, which are indicated as critical risk.

Area 5 is generally covered by the East Pine and University SCL substation areas.

Area 6: West Seattle

Area 6 in West Seattle is served primarily by a partially separated wastewater and drainage system, with smaller areas served by combined and separated systems. There is a small area within the southwestern portion of the area streets that is served by an informal drainage system, including ditch and culvert systems; this area contains drainage ditches listed as under capacity. There are short segments of under capacity drainage pipes located sparsely throughout the area. The area is primarily very low risk due to wastewater system capacity, with some medium and high risk areas, and critical risk areas in the West Seattle Junction and Delridge neighborhoods.

Area 6 is covered by the Delridge and Duwamish SCL substation areas.

Area 7: Duwamish

Area 7 includes the Duwamish Manufacturing Industrial Center. It is served both combined and partially separated wastewater and drainage systems, with smaller areas served by separated systems. It has a small proportion of streets served by a ditch and culvert system, particularly in the southwestern portion of the area. There are small concentrations of under capacity drainage pipes in the north-central and southern portions of the area. Approximately half of the area is indicated as medium, high, and critical risk due to wastewater system capacity.

Area 7 is covered by the South SCL substation area.

Area 8: SE Seattle

Area 8 is served primarily by a partially separated wastewater and drainage system, with smaller portions of the area served by combined or separated systems, including Seward Park. Most streets are served by formal drainage systems. There are under capacity drainage pipes concentrated along Rainier Avenue S in the northern end of the area, and generally in the southern end. The area is indicated primarily as very low risk due to wastewater system capacity, with a critical risk area indicated in the Beacon Hill neighborhood.

Area 8 is generally covered by the South and Creston Nelson SCL substation areas.

3.12.2 Impacts

Impacts Common to All Alternatives

Seattle would experience population and job growth under all the alternatives, which would result in an increase in demand for utility services. While the alternatives have different housing targets—job targets are the same under each alternative—the impacts to utilities as a result of the increased demand would be similar, as described below.

Water

None of the alternatives are anticipated to adversely impact water supply. As stated in **Section 3.12.1 Affected Environment**, SPU does not have any planned efforts to increase water supply during the 20-year planning horizon for the comprehensive plan. As reported in its Official Yield Estimate and Demand Forecast, SPU forecasts that future demand will remain relatively flat well below the available water supply beyond 2060 despite anticipated population and employment growth, due to continued efforts to conserve water and planned reductions in service to its wholesale water customers (SPU 2018, 2019a).

SPU currently has a forecasted surplus capacity between 35 and 40 MGD. Although all the alternatives project 80,000 to 120,000 more households by 2044 (approximately 40,000 to

80,000 more households than the estimates that factor into SPU's demand forecasts), the increase represents a modest increase to the nearly 620,000 households that SPU estimates serving regionally by 2040 (SPU 2018). The overall estimated yield of SPU's drinking water system is anticipated to support this higher growth rate through the planning period.

Individual housing and business developments would need to ensure adequate water supply for drinking water and fire suppression, which could require improvements or upgrades to the existing water distribution system and construction of new service connections where existing infrastructure is undersized. There could be variations in the extent to which water system infrastructure would need to be upgraded or added under each alternative depending on the age, extent, size, and condition of the existing infrastructure and the type of development being planned. For example, a greater degree of utility improvements may be required in urban neighborhood areas for multifamily development than in urban centers.

Wastewater & Drainage

All alternatives would result in greater demands on wastewater and drainage collection systems through a combination of population growth, water consumption, and the amount of impervious surface as a result of new development. The amount and location of increased demand, and any impacts as a result, would vary by alternative.

Development under all the alternatives would occur in areas with wastewater and, to a lesser extent, drainage capacity constraint risks as shown in **Exhibit 3.12-4** and **Exhibit 3.12-5**. All alternatives include shares of household and employment growth in regional centers and urban centers, some of which coincide with the high and critical risk areas for wastewater. This is due in part to the fact that SPU assigned a higher risk score to these areas because a sewer back-up or overflow would have a greater impact in denser areas. However, population growth alone is not likely to exacerbate capacity constraints. As stated in **Section 3.12.1 Affected Environment**, the WWSA found that the extent of surcharged wastewater pipe length would increase only slightly under future conditions, which considered effects from both climate change and population growth.

The drainage capacity constraint risk areas are generally not concentrated within regional or urban centers and, for the most part, are outside the areas targeted for the highest concentrations of growth. As with the WWSA, the DSA considered both population growth (through new development) and climate change. As stated in Affected Environment, while impervious surfaces from development can increase peak flows and affect conveyance capacity, these impacts could be mitigated by the City's stormwater code requirements for flow control.

As mentioned in Affected Environment, the West Point treatment plant is already approaching its capacity for maximum month loading (King County 2019). Treatment plant loading rates would continue to increase with population growth under all alternatives; however, the treatment plant may reach maximum month loading capacity under the action a~~A~~lternatives ~~2~~

~~through 5~~ sooner than it would under Alternative 1, No Action, due to their higher growth targets.

None of the alternatives are anticipated to adversely impact wastewater or drainage conveyance systems significantly. King County and SPU have several projects underway to improve the operation and reliability of the wastewater and drainage collection and treatment systems for anticipated future conditions, including climate change. SPU has major capital projects underway to reduce flooding, sewer back-ups, and CSO events. Major King County capital projects include those to reduce CSO events and to improve the operations and reliability of the West Point treatment plant. Over time, these projects will increase the capacity of the wastewater and drainage systems and alleviate the risk of sewer back-ups and flooding in high and critical risk areas.

Individual development projects would need to comply with building and utility codes to connect to the city's sewer and drainage systems. In addition, development projects would need to comply with the Seattle Stormwater Code and Stormwater Manual, which include requirements for stormwater flow control and treatment, including onsite management such as green stormwater infrastructure where feasible depending on development and soil conditions. Complying with these requirements helps mitigate the impacts of development on the City's wastewater and drainage systems and in some cases can result in improvements to wastewater and stormwater management through upgrades to existing sewer and drainage infrastructure and construction of new facilities where existing infrastructure is undersized or nonexistent.

While there could be variations in the extent to which wastewater and drainage infrastructure would need to be upgraded or added under each alternative depending on the extent and location of additional population growth and development, the nature of the impact between alternatives would generally be the same.

Electricity

All alternatives would result in increased demands on the electrical system due to population and job growth but are not anticipated to have adverse impacts on the electrical system. SCL currently anticipates a modest baseline demand growth of 0.5% per year between 2022 and 2032, which factors in economic growth and electrification of transportation and buildings. A rapid electrification scenario would increase demand by 32% over the baseline during that same period (SCL 2022b). While the action a~~A~~lternatives ~~2 through 5~~ target greater household increases than factored into SCL's Electrification Assessment, population growth is less of a consideration for load capacity than electrification of transportation and building systems. For either scenario, SCL will seek to increase energy supply through sustainable and resilient energy resources such as wind and solar while implementing customer demand management and energy efficiency programs (SCL 2022b).

As with the other utilities, development would need to connect to the city's power grid. This could require minor improvements or upgrades to existing electrical infrastructure and construction of new service connections where existing infrastructure is undersized or

nonexistent. While there could be variations in the extent to which electrical infrastructure would need to be upgraded or added under each alternative, the nature of the impact between alternatives would be the same.

130th/145th Station Areas

The nature of impacts to water, wastewater, and electricity would be the same as described above in **Impacts Common to All Alternatives**. The 130th/145th Station area is within the Thornton Creek watershed and partially within the Densmore stormwater basin, which is capacity constrained, and includes many blocks with an informal drainage system, including some ditch and culvert systems. Increases in impervious surface due to new development could increase peak flows and potentially affect conveyance capacity. Development in this area would be subject to more stringent stormwater management requirements to avoid adversely affecting conveyance capacity and to protect water quality. These requirements could include flow control and treatment or the construction of formal stormwater drainage facilities if none are present.

Equity & Climate Vulnerability Considerations

Utility infrastructure is vulnerable to the impacts of climate change in a variety of ways.

Seattle's water supply comes from the Cedar and Tolt Rivers, which rely on winter snowpack and precipitation. Lower winter snowpacks due to drought and changes to precipitation patterns would reduce water recharge to these rivers. Even with these risks from climate change, the City is expected to have sufficient water to meet future demand; however, periods of prolonged drought could affect water supply during the dry summer and fall months.

The City's wastewater and drainage systems are vulnerable to sea level rise that could inundate conveyance pipes and facilities, particularly those facilities that lie within the 100-year floodplain. These facilities include CSO and drainage mainlines, pumps, and the West Point treatment plant. Impacts from sea level rise could be exacerbated by more frequent and extreme precipitation events could increase the potential for sewer back-ups, causing flooding and water quality impacts through CSO events.

Seattle's electrical power relies on hydroelectric sources, which rely on water supplies vulnerable to reduced winter snowpacks and drought. Warmer average temperatures and more frequent extreme heat days lead to greater average and peak demand and can overwhelm electrical supply and distribution systems. More frequent and extreme storm events can damage transmission lines and cause power outages.

The effects of climate change have disparate impacts on both populations and locations within Seattle, particularly for socially and economically vulnerable populations. These impacts can be worse for sensitive groups living in areas more susceptible to climate change, such as those areas more prone to flooding or those that experience greater heat island effects. The Seattle Climate Vulnerability Assessment identifies the International District, Duwamish Valley, South Park, Georgetown, SODO, and Rainier Valley as neighborhoods with sensitive populations that

are vulnerable to flooding and extreme heat events (City of Seattle 2023). Except for the International District, these neighborhoods coincide with Areas 7 and 8. These areas experience a very small to modest share of new households under all alternatives, ranging between 1.9% to 3.0% for Area 7 and 7.9% to 11.6% for Area 8.

The City of Seattle and King County are working to address these vulnerabilities. In addition to capital improvements to protect and reinforce existing infrastructure, SPU, King County, and SCL have projects and programs in place to proactively adapt their respective facilities. These include constructing additional underground storage for combined wastewater flows, incentivizing water and power conservation to reduce demand, and promoting renewable energy and distributed power sources, such as residential solar panels, to bolster supply.

New construction contemplated by the plan alternatives has the possibility of improving climate resiliency by replacing or upgrading aging infrastructure. For example, while new development can result in a greater amount of impervious surface that could add greater stormwater flows to capacity constrained systems, it can also result in on-site stormwater management facilities, including green stormwater infrastructure, as well as upgrades to public wastewater and drainage infrastructure.

In addition, new construction is subject to current development codes, which results in greater energy and water efficiency than in older development and would result in overall less electrical and water demand per capita. However, as buildings and transportation become more electrified—also a strategy to address climate change—more overall demand will be put on SCL's electrical system.

Impacts of Alternative 1: No Action

Under Alternative 1, No Action, growth would continue as planned under the 2035 Comprehensive Plan. Residential growth would be directed primarily to ~~regional~~ existing urban centers and ~~urban centers~~villages. Employment would follow the same pattern, in addition to being directed to manufacturing and industrial centers. As the City has been planning for and directing growth to these areas, there would be no adverse impacts to utilities.

130th/145th Station Areas

Impacts to utilities would be the same as described above for the 130th/145th Station Areas under **Impacts Common to All Alternatives**. Development in this area would be subject to more stringent stormwater management requirements, which could include flow control and treatment, to avoid adversely affecting conveyance capacity and to protect water quality.

Equity & Climate Vulnerability Considerations

Alternative 1 directs approximately 8,500 households to Areas 7 and 8, primarily to existing urban villages~~centers~~ in Area 8. These areas include neighborhoods that have vulnerable

populations and are more susceptible to climate change impacts such as flooding and heat island effects. Growth in these areas may require a greater degree of investment in improved drainage and electrical utilities to overcome these vulnerabilities.

Impacts of Alternative 2: Focused

Under Alternative 2, growth would be directed to areas of focused growth, or neighborhood centers, in addition to the regional and ~~regional~~ urban centers (urban centers and urban villages under the current plan) as described under Alternative 1, No Action. Alternative 2 targets 100,000 new housing units, 20,000 households above Alternative 1, No Action. This alternative would result in more intense growth in areas that are currently less developed, such as in areas zoned as Neighborhood Residential.

Utility infrastructure within regional and ~~regional~~ urban centers would be expected to accommodate planned growth; however, focused and denser development within neighborhood center locations would likely require utility upgrades or expansion, particularly for stormwater management in Areas 1 and 2, which would accommodate the greatest amount of growth outside the Downtown Regional Center. Improvements could include on-site stormwater management, construction of green stormwater infrastructure, and new and upgraded drainage systems in association with development.

Areas 1 and 2 are characterized by single-family development and have extensive informal drainage systems, including ditch and culvert systems, particularly within the Piper and Thornton Creek watersheds (**Exhibit 3.12-3**). Development in Areas 1 and 2 could add stress to drainage systems that are already capacity constrained, including within the capacity constrained Densmore basin, beyond that of Alternative 1, No Action. These constraints could limit housing development where requirements for flow control or treatment prove too costly or are physically infeasible.

130th/145th Station Areas

The 130th/145th Station Area under Alternative 2 would consist of three neighborhood centers with more intense combination of residential and commercial development than under Alternative 1, No Action, including over 260 more jobs and over 2.6 times the number of housing units. This would lead to greater demand on utilities than under Alternative 1, along with a greater need for potential utility improvements within the area, particularly related to stormwater management in an area designated as capacity constrained.

Equity & Climate Vulnerability Considerations

Alternative 2 adds over 10,000 households in Areas 7 and 8, primarily in ~~regional~~ urban centers and a limited number of neighborhood centers. These areas include neighborhoods that have vulnerable populations and are more susceptible to climate change impacts such as flooding

and heat island effects. Growth in these areas may require a greater degree of investment in improved drainage and electrical utilities to overcome these vulnerabilities.

Impacts of Alternative 3: Broad

Under Alternative 3, growth would be directed to new housing types throughout urban neighborhood areas, in addition to the regional and urban centers as described under Alternative 1, No Action. As with Alternative 2, Alternative 3 targets 100,000 new housing units, 20,000 households above Alternative 1, No Action. The addition of multifamily homes of various sizes—duplexes up to sixplexes—would likely require construction of new water and electrical service connections and potential upgrades to wastewater and drainage facilities to accommodate greater population and development density, particularly in areas characterized by large-lot single-family zones. These upgrades could be beneficial when replacing outdated or undersized facilities.

Under Alternative 3 a large proportion (nearly 38%) of growth would be within Areas 1 and 2, due to the extent of designated urban neighborhood land within those areas. As described above, development in these areas could add stress to drainage systems that are already capacity constrained, beyond that of Alternative 1, No Action, and Alternative 2 Focused. These constraints could limit housing development where flow control or treatment prove too costly or are physically infeasible. This concern would apply to other areas of the city with informal drainage systems, such as in the southwest corner of Area 6.

Equity & Climate Vulnerability Considerations

Alternative 3 adds over 12,000 households in Areas 7 and 8, primarily in ~~regional~~ urban centers and urban neighborhoods in Area 8. These areas include neighborhoods that have vulnerable populations and are more susceptible to climate change impacts such as flooding and heat island effects. Growth in these areas may require a greater degree of investment in improved drainage and electrical utilities to overcome these vulnerabilities.

Impacts of Alternative 4: Corridor

Alternative 4 would allow for a variety of housing types along transportation corridors in addition to directing growth to regional and regional centers. As with Alternatives 2 and 3, it targets 100,000 new housing units, 20,000 households above Alternative 1, No Action. Under this scenario, Area ~~1~~ 2 receives the greatest amount of growth outside the Downtown Regional Center.

As under Alternative 3 Broad, the addition of multifamily homes of various sizes—duplexes up to sixplexes—would likely require new water and electrical service connections and potential upgrades to wastewater and drainage facilities to accommodate greater population and

development density. Benefits from new development related to utility improvements would be concentrated along corridors, but not as focused as under Alternative 2.

Alternative 4 ~~has the largest~~also has a large share of population growth (over 38%) within Areas 1 and 2 ~~as compared to the other alternatives~~. As described above, development in these areas could add stress to drainage systems that are already capacity constrained. The areal extent of potential development within these areas would be greater than Alternatives 1 and 2 but less than under Alternative 3, as it would be focused along corridors. These constraints could hamper growth where requirements for flow control or treatment prove too costly or are physically infeasible. This concern would apply to other areas of the city with informal drainage systems, such as in the southwest corner of Area 6.

Equity & Climate Vulnerability Considerations

Alternative 4 adds nearly 12,000 households in Areas 7 and 8, primarily in ~~regional~~ urban centers and along corridors in Area 8. These areas include neighborhoods that have vulnerable populations and are more susceptible to climate change impacts such as flooding and heat island effects. Growth in these areas may require a greater degree of investment in improved drainage and electrical utilities to overcome these vulnerabilities.

Impacts of Alternative 5: Combined

Under Alternative 5, growth would be targeted within existing and expanded regional centers and urban centers, within neighborhood centers, and within expanded housing options along corridors and throughout urban neighborhoods. Alternative 5 targets 120,000 new housing units, 40,000 units above Alternative 1, No Action, which would lead to ~~the greatest~~a greater demand on utilities as compared to ~~the other alternatives~~Alternatives 1 through 4. Similar to the other alternatives, Areas 1 and 2 would accommodate the greatest amount of growth, over 37%.

The addition of 40,000 more housing units over the course of the planning period would likely exacerbate risks due to wastewater and drainage system capacity without improvements to those existing systems. However, as described for the other alternatives, development under this scenario would require improvements and upgrades to existing utilities and construction of new facilities to accommodate the increased density, which could offset the impact of increased growth.

The addition of 120,000 total housing units throughout the city may run into greater constraints than under ~~the other alternatives~~Alternatives 1 through 4 if necessary utility improvements prove too costly or physically infeasible to support new development within capacity constrained drainage basins, areas served by informal drainage systems, or within creek basins. For example, as discussed above, development in the northern portions of Areas 1 and 2 could add stress to drainage systems that are already capacity constrained and would be subject to more stringent stormwater management requirements for flow control and

treatment. These constraints may limit the overall number of households that could be developed in those areas.

130th/145th Station Areas

The 130th/145th Station Area under Alternative 5 would consist of an urban center on both sides of I-5 around the Sound Transit light rail station and a neighborhood center at NE 145th Street. This includes over 1,000 jobs and over 2,700 housing units and would result in a more intense combination of residential and commercial development than under Alternatives 1 or 2 over a larger area. Demand on utilities would be greater than under Alternatives 1 and 2. While new development has the benefit of improving utility infrastructure, this development would occur within a capacity constrained stormwater basin, which may be a constraint on the extent of new development and resulting increase in impervious surface if stormwater cannot be managed on site or through improved conveyance infrastructure.

Equity & Climate Vulnerability Considerations

Alternative 5 adds approximately 17,500 households in Areas 7 and 8, primarily in ~~regional~~ urban center and urban neighborhood areas in Area 8. These areas include neighborhoods that have vulnerable populations and are more susceptible to climate change impacts such as flooding and heat island effects. Growth in these areas may require a greater degree of investment in improved drainage and electrical utilities to overcome these vulnerabilities.

Impacts of Preferred Alternative

Note: The impacts analysis for the Preferred Alternative was added since the Draft EIS.

Growth patterns under the Preferred Alternative would be similar to Alternative 5, as it includes the same target of 120,000 new housing units. As a result, it would lead to a similar demand on utilities as Alternative 5 and a greater demand as compared to Alternatives 1 through 4.

As with Alternative 5, the addition of 40,000 more housing units over the course of the planning period would likely exacerbate risks due to wastewater and drainage system capacity. However, as described for the other alternatives, development under this scenario would require improvements and upgrades to existing utilities and construction of new facilities to accommodate the increased density, which could offset the impact of increased growth.

Growth under the Preferred Alternative may run into similar constraints as Alternative 5 if utility improvements prove too costly or physically infeasible to support new development within capacity constrained drainage basins, areas served by informal drainage systems, or within creek basins. Of all the alternatives, the Preferred Alternative would direct the greatest share of growth (41%) to Areas 1 and 2, which could add stress to drainage systems that are already capacity constrained and would be subject to more stringent stormwater management

requirements for flow control and treatment. These constraints may limit the overall number of households that could be developed in those areas.

130th/145th Station Area

As with Alternative 5, the 130th/145th Station Area under the Preferred Alternative would consist of an urban center on both sides of I-5 around the Sound Transit light rail station and a neighborhood center at NE 145th Street. However, it would include approximately 650 jobs and 2,200 housing units, less than Alternative 5 and over a slightly smaller extent. However, as described for Alternative 5, this development would occur within a capacity constrained stormwater basin, which may be a constraint on the extent of new development and resulting increase in impervious surface if stormwater cannot be managed on site or through improved conveyance infrastructure.

Equity & Climate Vulnerability Considerations

The Preferred Alternative adds approximately 12,300 households in Areas 7 and 8, primarily in urban center and urban neighborhood areas in Area 8. These areas include neighborhoods that have vulnerable populations and are more susceptible to climate change impacts such as flooding and heat island effects. Growth in these areas may require a greater degree of investment in improved drainage and electrical utilities to overcome these vulnerabilities.

3.12.3 Mitigation Measures

Incorporated Plan Features

None of the alternatives described in **Chapter 2** of this EIS include plan features that explicitly address utilities. However, the Comprehensive Plan includes a Utilities Element that lists policies and goals to ensure safe, reliable, and equitable service and growth throughout the city; protect water quality; and encourage energy efficiency and renewable resources. In addition, the City is adopting a climate element that would include greenhouse gas reduction measures and climate resilience measures.

Regulations & Commitments

Drinking Water

Federal

- Safe Drinking Water Act, 42 USC 300 et seq., Chapter 6A, administered by the U.S. Environmental Protection Agency

State

- Water Systems, WAC Title 246, Chapters 290-296, administered by the Washington State Department of Health

Local

- Utilities, SMC Title 21, Subtitle I – Water, administered by SPU
- Building and Construction Codes, SMC Title 22, includes plumbing and fire codes, administered by SDCI
- City of Seattle Standard Specifications for Road, Bridge, and Municipal Construction

Wastewater & Combined Sewer

Federal

- National Environmental Policy Act United States Code (USC) 4321 et seq.
- Clean Water Act, 33 United States Code (USC) 1251 et seq., including Section 402 – National Pollutant Discharge Elimination System (NPDES)

State

- State Environmental Policy Act RCW Title 43.21C; WAC 197-11
- Washington State Department of Ecology, WAC Title 173, Chapters 200-270, which includes administration of the NPDES program, discharge and effluent standards, the waste discharge general permit program, construction of wastewater treatment plants, and construction and operation of combined sewer overflow reduction facilities
- NPDES Wastewater Discharge Permit program, administered by the Washington State Department of Ecology
- Wastewater Collection System Consent Decree, administered by the Washington State Department of Ecology and U.S. Environmental Protection Agency

Local

- Metropolitan Functions, King County Code (KCC) Title 28, sections of which pertain to the County's functions for establishing and operating the regional wastewater treatment system.
- Utilities, SMC Title 21, Subtitle II – Sewers, administered by SPU
- Building and Construction Codes, SMC Title 22, includes plumbing code, administered by SPU
- Side sewer permit program, administered by SPU
- City of Seattle Standard Specifications for Road, Bridge, and Municipal Construction

Stormwater

Federal

- Clean Water Act, 33 USC 1251 et seq., including Section 402 – National Pollutant Discharge Elimination System
- Endangered Species Act, 16 USC 1531 et seq.

State

- National Pollutant Discharge Elimination System (NPDES) Western Washington Phase I Municipal Stormwater General Permit, administered by the Washington State Department of Ecology
- NPDES Industrial Stormwater General Permit, administered by the Washington State Department of Ecology
- Stormwater Management Manual for Western Washington, administered by the Washington State Department of Ecology
- Washington State Hydraulic Code, WAC Title 220, Chapter 660, administered by the Washington Department of Fish and Wildlife

Local

- Building and Construction Codes, SMC Title 22, Subtitle VIII – Stormwater Code, administered by SDCI and SPU
- Seattle Stormwater Manual
- City of Seattle Standard Specifications for Road, Bridge, and Municipal Construction

Electrical

Federal

- National Electrical Code, as adopted by the National Fire Protection Association

State

- 2019 Washington State Clean Energy Transformation Act, amending portions of RCW Titles 19 (Business Regulations – Miscellaneous), 43 (State Government – Executive), 80 (Public Utilities), and 82 (Excise Taxes) to commit Washington to an electricity supply free of greenhouse gas emissions by 2045.
- Washington State Energy Code, WAC Title 51, Chapters 11C and 11R

Local

- Utilities, SMC Title 21, Subtitle IV – Lighting and Power, administered by SCL
- City of Seattle Standard Specifications for Road, Bridge, and Municipal Construction

Other Potential Mitigation Measures

While each alternative has the potential to impact utilities through increased demand, none of these impacts are identified as significant adverse impacts. King County, SPU, and SCL regularly plan and adapt to changing growth patterns and are currently engaged in efforts to improve wastewater and drainage system capacity, reduce water consumption and electrical demand, and increase the resiliency of their utility systems against the impacts of climate change. City codes regulating construction and future utility investments will continue to ensure new development addresses any service or capacity constraints.

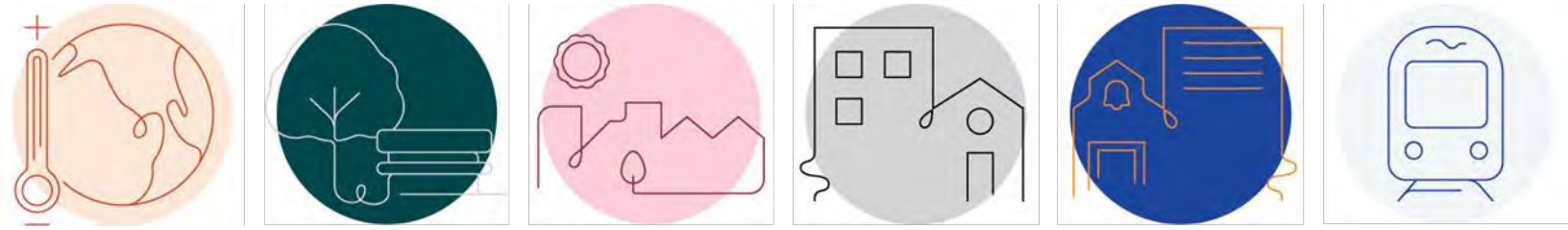
3.12.4 Significant Unavoidable Adverse Impacts

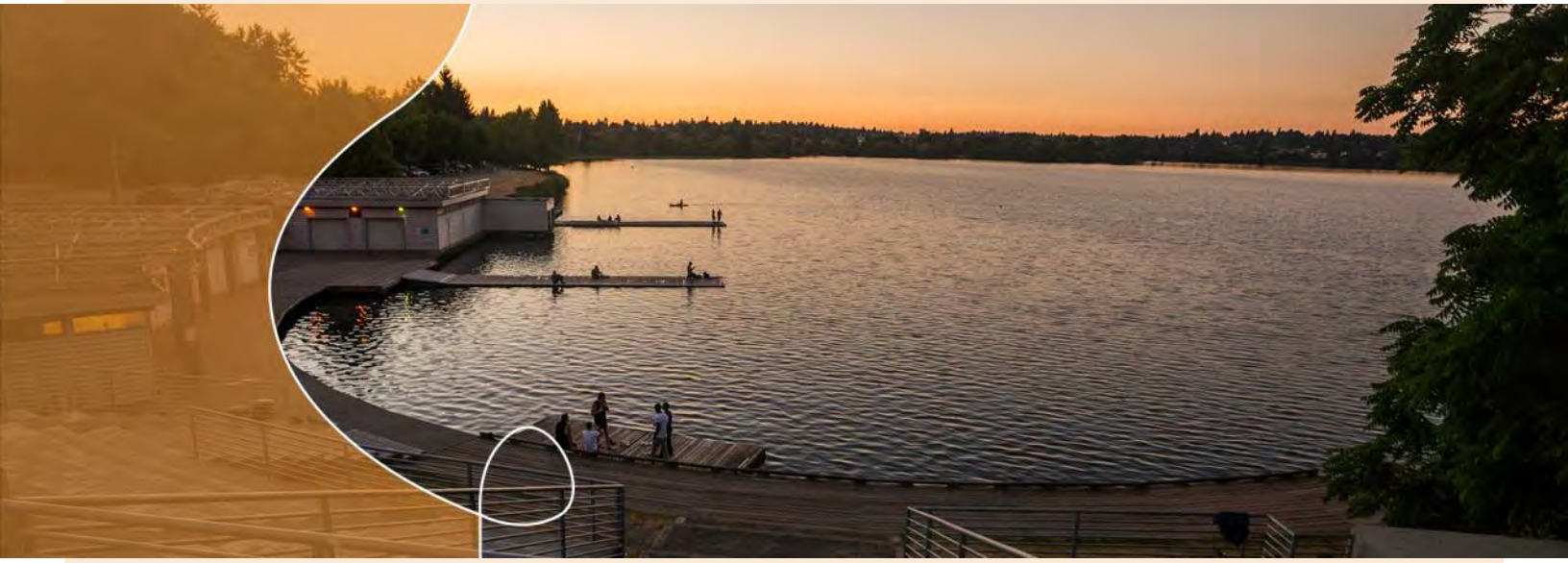
~~There would be n~~No significant unavoidable adverse impacts to utilities are anticipated under any of the alternatives as a result of the City's Comprehensive Plan update. Population and job growth under all alternatives would increase demand on the City's water, wastewater, drainage, and electrical systems and, for the action alternatives, exceed the planned growth anticipated in the utilities' planning forecasts. However, the utilities are anticipated to accommodate this growth through a combination of existing and future anticipated supply, demand management, and upgrades to existing infrastructure and facilities to improve capacity, operation, and reliability.

In areas considered capacity constrained for stormwater runoff, such as those areas with informal ditch and culvert systems, development would be subject to more stringent stormwater management requirements to avoid adversely affecting conveyance capacity and protect water quality. These requirements could require construction of formal drainage facilities to treat and manage the flow of stormwater as well.

Intentionally blank

4 RESPONSES TO COMMENTS





Source: City of Seattle, 2023.

This chapter provides responses to comments on the Draft Environmental Impact Statement (EIS). It includes the following:

- List of Commenters
- Written Comments and Responses
  - Response to Common Comment Themes
  - Comment and Responses Matrix

The marked comment letters are included in **Appendix K**.

4.1 List of Commenters

Approximately 504 written comment letters were received during the comment period March 7, 2024 to May 6, 2024. **Exhibit 4.1-1** lists the tribal, agency, interest group, businesses, and property specific commenters. Last names and agency names are listed.

Exhibit 4.1-1. List of Commenters: Tribes, Agencies, Interest Groups and Businesses, Property Specific

Number	Name	Agency
Tribes		
1	Spiry, Martin, Moses	The Snoqualmie Tribe
Agencies		
2	Representative Pollet	Representative Gerry Pollet 46th District 1
3	Representative Pollet	Representative Gerry Pollet 46th District 2
4	Hollingsworth	District 3 Seattle City Council
5	Daffern, Goldberg	Seattle Planning Commission
6	McCoy	Department of Commerce
Interest Groups and Businesses		
7	Cooke	Blue Rooster Building East LLC
8	Healey	Vulcan Real Estate
9	McCullough	McCullough Hill PLLC
10	Connell	Holland Partner Group
11	Gunter	Alexandria Real Estate Equities
12	Sanderson, Lee, Pham, Merriweather	Crescent Collaborative
13	Martin	Futurewise
14	Duvall	NAIOP Washington State
15	Boyd	Bellwether Housing
16	Bertolet	Sightline

Number	Name	Agency
17	Woo	Historic Seattle
18	Martin, Simpson	Complete Communities Coalition
19	Morris 1	Birds Connect Seattle
20	Morris 2	Birds Connect Seattle
21	McCoy	House Our Neighbors
22	Chávez	Black Home Initiative (BHI) Network
23	Johnson	Friends of Ravenna-Cowen
24	Stewart	Ballard Alliance
25	Lazerwitz	Roosevelt Neighborhood Association
26	Gurkewitz, Williams	Thornton Creek Alliance
27	McAleer 1	Laurelhurst Community Club Council
28	McAleer 2	Laurelhurst Community Club Council
29	McAleer 3	Laurelhurst Community Club Council
30	McAleer 4	Laurelhurst Community Club Council
31	McAleer 5	Laurelhurst Community Club Council
32	McAleer 6	Laurelhurst Community Club Council
33	McAleer 7	Laurelhurst Community Club Council
34	McAleer 8	Laurelhurst Community Club Council
35	McAleer 9	Laurelhurst Community Club Council
36	McAleer 10	Laurelhurst Community Club Council
37	McAleer 11	Laurelhurst Community Club Council
38	McAleer 12	Laurelhurst Community Club Council
39	McAleer 13	Laurelhurst Community Club Council
40	McAleer 14	Laurelhurst Community Club Council
41	McAleer 15	Laurelhurst Community Club Council
42	McAleer 16	Laurelhurst Community Club Council
43	McAleer 17	Laurelhurst Community Club Council
44	McAleer 18	Laurelhurst Community Club Council
Property Specific		
45	Aggerholm	Grousemont Associates, QA Canal LLC
46	Baumgartner	
47a	Boyd 1	Bellwether Housing
47b	Boyd 2	Bellwether Housing
48	Clawson	West Roy LLC
49	Clawson	Nicola Wealth

Number	Name	Agency
50	Clawson	Alteutian Spray Fisheries
51	Clawson	Lee Johnson
52	Clawson	70th & Greenwood Ave LLC 1
53	Clawson	70th & Greenwood Ave LLC 2
54	Cramer	Individual
55	Dunn	Dunn & Hobbes, LLC
56	Fiorito	Fiorito Family
57	Gunter	Alexandria Real Estate Equities, Inc. 1
58	Gunter	Alexandria Real Estate Equities, Inc. 2
59	Chhan and Enslow	Individual
60	Harel	Era Living
61	Heglund	MRH Properties LLC
62	Keck	Schnitzer West
63	Kramer	Individual
64	Lai	DCL UW LLC 1
65	Lai	DCL UW LLC 2
66	Lehmann, Gillespie, Soules, Liebman	Lander Street Owners
67	Marasco	Security Properties
68	Maxwell	Bayview Walker LLC/Prologis LP
69	McCutcheon	IPB Properties Inc.
70	McCullough	Graham Street Realty
71	Morrison	McCullough Hill PLLC
72	Norman	Individual
73	Rohlfing	Individual
74	Roos	Hillis Clark Martin & Peterson Law Offices
75	Selig	J. Selig Real Estate LLC
76	Snow	Snow & Company Inc
77	Tobar	CIM Group
78	Warner	Balboa Retail Partners
79	Wood	SBPS LLC
80	Worthington	Lock Vista Apartments LLC
81	Smith	Urban Visions 1
82	Smith	Urban Visions 2

Source: City of Seattle, 2024.

The following table lists individual commenters in alphabetical order by last name. First names are shown where there are multiple people with a common last name.

Exhibit 4.1-2. Individual Comment Letters Received

Number	Last Nam
83	Achanta
84	Akalaitis 1
85	Akalaitis 2
86	Alexander
87	Alfieri
88	Alspach
89	Amadon 1
90	Amadon 2
91	Amadon 3
92	Amadon 4
93	Anderson
94	Avron
95	Barcklow
96	Barker
97	Barrett
98	Bartanen
99	Barton
100	Baskin 1
101	Baskin 2
102	Baskin 3
103	Bassage
104	Bastian
105	Beauregard
106	Beauregard
107	Beffa
108	Bendich, Arnold
109	Bendich, Judith
110	Berg
111	Berkley, Brennen 1
112	Berkley, Brennen 2
113	Berkley, Scott 1
114	Berkley, Scott 2
115	Berliner
116	Best
117	Bhagwandin, Eva 1
118	Bhagwandin, Eva 2
119	Bhagwandin, Khai
120	Bhagwandin, Samuel
121	Bickel
122	Bicknell
123	Bledsoe 1
124	Bledsoe 2
125	BlueSpruce
126	Blumenthal
127	Bonjukian
128	Booze
129	Bos
130	Brady
131	Brandt
132	Brod
133	Broderick
134	Brooking
135	Broska
136	Bruan-Kelly 1
137	Bruan-Kelly 2
138	Brunton
139	Burrill
140	Bushue
141	Byrd
142	C, Nancy
143	Candiotti
144	Cannon
145	Cantrell
146	Carre
147	Carter
148	Catena
149	Cave
150	Chadsey
151	Chadsey
152	Charbonneau
153	Chavez
154	Chernyshev
155	Church
156	Clabough
157	Clark, Lisa 1
158	Clark, Lisa 2
159	Clark, Dave
160	Clifton
161	Close 1
162	Close 2
163	Cohen-Lewe
164	Cohen
165	Colledge
166	Cramer
167	Crocker 1
168	Crocker 2
169	Crockett
170	Cunningham Adams
171	Cushman-Macey
172	Dack
173	Dahl
174	Daniel
175	Daniels

Number	Last Nam
176	Danner
177	Davis Deborah
178	Davis Courtney
179	Devi
180	Diaz
181	Dickerson
182	Dolan 1
183	Doran 2
184	Downward
185	Du Mas, et al.
186	Duggan
187	Dunn
188	Durslag 1
189	Durslag 2
190	Dwyer
191	Edlund
192	Eldridge
193	Eliason
194	Ellison
195	Engstrom
196	Estrada
197	Exit
198	Fahrenbruch
199	Faste
200	Fayyad
201	Faz
202	Fellows
203	Fernandes
204	Fertal
205	Field
206	Filipovic
207	Foltz
208	Ford
209	Franco
210	Freidberg

Number	Last Nam
211	Friedmann
212	Fristoe
213	Gadeken
214	Gaul
215	Ghiorso
216	Gillenwater 1
217	Gillenwater 2
218	Gillenwater 3
219	Gillenwater 4
220	Gingerich
221	Gloger
222	Godfrey 1
223	Godfrey 2
224	Godon
225	Grant, Andrew
226	Grant, Suzanne
227	Graves
228	Green
229	Griffin 1
230	Griffin 2
231	Griffin 3
232	Griffin 4
233	Griffin 5
234	Griffin 6
235	Griffith, Jonah
236	Griffith, Katy
237	Gross
238	Gwinn
239	Hagerty
240	Haines
241	Hammarlund 1
242	Hammarlund 2
243	Hance
244	Hannah
245	Harper

Number	Last Nam
246	Havkins
247	Hedlund
248	Heerwagen
249	Hill
250	Hiltbrunner
251	Holland
252	Horn
253	Howe
254	Hranac
255	Hutchins
256	Irwin
257	Itano
258	Janzen
259	Jarvis
260	Jaureguy
261	Jeannette
262	Jeniker
263	Jerome
264	Johnson, Carla
265	Johnson, Iskra 1
266	Johnson, Iskra 2
267	Johnston
268	Jones Judi
269	Jones Mary
270	Joseph
271	K R
272	Kaldowski
273	Keefe
274	Keller, Sophia
275	Keller, Kathryn
276	Kelly, Peter
277	Kelly, Shana
278	Kerkof
279	Kidder
280	Kimball

Number	Last Nam
281	King
282	Kirchoff
283	Kirk
284	Kirschner
285	Kitchen
286	Klein
287	Knoblet
288	Kordick
289	Kramer
290	Kuczmarski
291	Lafferty
292	Lange
293	Langhans 1
294	Langhans 2
295	Lappas
296	Lavigne
297	Law
298	Lazerwitz 1
299	Lazerwitz 2
300	Lazerwitz 3
301	Lebegue
302	Leconte
303	Lee
304	Leonard
305	Leshner
306	LeVine
307	Lewis, Sarah
308	Lewis, Christine
309	Lim
310	Limberg
311	Lin
312	Little
313	Loder
314	Loeber
315	Lorey 1
316	Lorey 2
317	Lowhim 1
318	Lowhim 2
319	Ludman
320	Lukose
321	Lund
322	Luxem
323	Lyris
324	Martin
325	Mashayekh
326	Maslan
327	Mattione
328	Mauel
329	McCormick
330	McCue
331	McDonald
332	McEwuen
333	McKiernan
334	Michalski
335	Miller, Anne
336	Miller, Bonnie
337	Miller, Cameron Sidney
338	Miller-Dowell Amy
339	Mireia
340	Moehring 1
341	Moehring 2
342	Morgan 1
343	Morgan 2
344	Morgan 3
345	Morrow
346	Muir 1
347	Muir 2
348	Muller
349	Neylan
350	Nicol
351	Nims
352	Niven
353	Niznik
354	Nordstrom
355	O, Pennie
356	O'Steen
357	Obray
358	Okamoto
359	Olson
360	Olwell
361	Ortega
362	Ortiz
363	Ostrer
364	Overgaard
365	Oxman
366	Pan
367	Paul
368	Pearson
369	Pedroso
370	Pelland
371	Pellkofer
372	Penrose
373	Peterson
374	Pifer
375	Pike 1
376	Pike 2
377	Pike 3
378	Placido
379	Pope 1
380	Pope 2
381	Price
382	Quarre
383	Radmanovic
384	Rai Trapero
385	Ramsdell

Number	Last Nam
386	Rava
387	Ravell Padial
388	Ravell Mireia
389	Reuben
390	Riley
391	Robb
392	Roberts
393	Robinson
394	Rock
395	Roda
396	Root
397	Roraback
398	Rose
399	Rosentreter
400	Rubenkonig
401	Ruha
402	Russell
403	Saakian
404	Saliba
405	Sanborn
406	Sanchez
407	Sanders
408	Sanford
409	Sargent
410	Saxton
411	Scanlon
412	Scarlett 1
413	Scarlett 2
414	Scarlett 3
415	Scarlett 4
416	Scarlett 5
417	Schiefer, Estelle
418	Schiefer
419	Scholes
420	Schubert

Number	Last Nam
421	Scott
422	Scully
423	Shen
424	Shettler 1
425	Shettler 2
426	Shettler 3
427	Siegelbaum
428	Siegfriedt 1
429	Siegfriedt 2
430	Sims 1
431	Sims 2
432	Skantze
433	Smith
434	Speers
435	Stephensen
436	Stevens
437	Stiffler
438	Stockwell
439	Strock
440	Stutman
441	Sundquist
442	Surdyke
443	Swing
444	Talen 1
445	Talen 2
446	Taylor, Patrick
447	Taylor Sarah
448	Tenhoff-Barton
449	Thiessen
450	Thomas, Robin
451	Thomas, Toby
452	Toms
453	Toohey
454	Travis
455	Trecha

Number	Last Nam
456	Tully
457	Ullmann
458	Urban
459	Valett
460	Van Bronkhorst
461	Villasana
462	Vitz-Wong
463	VonVeh
464	Wada
465	Wade
466	Wagner 1
467	Wanger 2
468	Waldman
469	Wall
470	Ward, Galen
471	Ward, Sarah
472	Warsinske 1
473	Warsinske 2
474	Wartman
475	Weatherford
476	Webster 1
477	Webster 2
478	Weinstein, Paul
479	Weinstein Colleen
480	Weissman, Jeff
481	Weissman, Maggie
482	Weissman
483	Westgard
484	Wheeler 1
485	Wheeler 2
486	Williams, Bonnie 1
487	Williams, Bonnie 2
488	Williams, Charles
489	Williams, Pamela
490	Williams, Tony

Number	Last Nam
491	Wilmot
492	Wineman
493	Winkle
494	Wollett
495	Woo

Number	Last Nam
496	Wu
497	Young
498	Zemke 1
499	Zemke 2
500	Zemke 3

Number	Last Nam
501	Zemke 4
502	Zemke 5
503	Zubia
504	Zuluaga

Source: City of Seattle, 2024.

4.2 Written Comments & Responses

4.2.1 Response to Common Comment Themes

This section provides responses to comment themes in comments including comments regarding affordable housing, tree canopy, capacity for growth, and economic analysis. These responses are referenced in the Comments and Responses Matrix in **Section 4.2.1**.

Documents Referenced

Throughout this Chapter references are made to the following documents:

One Seattle Plan: The One Seattle Plan refers to the City's update to its Comprehensive Plan and implementing zoning and development regulations.

One Seattle Plan Comprehensive Plan Update, Draft 2024 ("Draft Plan"): This plan was issued for public comment on March 5, 2024.

One Seattle Plan Comprehensive Plan Update, Mayor's Proposed 2025 ("Proposed Plan"): This plan was issued on January 6, 2025 for consideration by City Council.

Draft EIS: The Draft EIS was issued in March 7, 2024 and evaluated proposals to accomplish the periodic update of the Comprehensive Plan. It reviewed Alternative 1 No Action and action alternatives 2 through 5. Specific references to the Draft EIS are made when necessary to identify the EIS document as it was presented on March 7, 2024.

Final EIS: Many of the responses to comments direct the reader to sections of the Final EIS since the Final EIS contains the Draft EIS together with clarifications and corrections as well as an evaluation of the Preferred Alternative. The Final EIS was issued in January 30, 2025 and evaluates a Preferred Alternative that is in the range of Draft EIS Alternatives. The Preferred Alternative includes the growth strategy in the **Mayor's Proposed One Seattle Plan** but for the purposes of this Final EIS studies a growth level of 120,000 dwelling units whereas the Plan cites 80,000 dwelling units for consistency with regional growth targets.

EIS: The term EIS by itself refers to both the Draft EIS and Final EIS.

4.2.1.1 Affordable Housing Evaluation

Letters 4 and 5 and similar

Comment theme: *Address definition of affordability. Ensure there is housing for each economic segment of the population per HB 1220.*

The EIS addresses the affordability of dwellings and potential to meet demand in **Section 3.8 Population, Housing, & Employment**.

Regarding HB 1220 evaluations, an additional sub-section was added to **Section 3.8** in the in the Final EIS. It presents a comparison of residential land capacity by income level served compared to the city's projected housing needs as detailed in King County Countywide Planning Policies. This analysis is provided for both Alternative 1, No Action, and the Preferred Alternative.

The Preferred Alternative addresses housing production barriers and actions such as zoning reform, upzones, modifications of development standards, incentives for the production of stacked flats, amendments to ADU regulations, legislation regarding congregate housing, design review reform, and permit process improvements. See also EIS mitigation measures in **Section 3.8.3**.

4.2.1.2 Tree Canopy Evaluation

Response to Comments that Appeared in Multiple Letters

Letter 83 & Similar

Comment Theme: *What are the impacts of the One Seattle Plan on Seattle's plants and animals? Questions about finding of no significant adverse impacts on plants and animals.*

> **Response:** The potential impacts of the alternatives on plants and animals are described and evaluated in **Section 3.3.3** of the Final EIS. The assessment of the potential for significant unavoidable adverse impacts on plants and animals is based on the definition of significant unavoidable adverse impacts, as described on **page 3.3-2** of the Final EIS. The key findings of the analyses of the potential impacts of the alternatives include the following:
>
> - Under all of the alternatives, the potential for adverse effects on plants and animals would be avoided, minimized, documented, or mitigated through regulatory reviews and permitting processes that apply to individual projects.
> - The action alternatives include new and amended policies to maintain and enhance tree canopy and to expand tree canopy throughout the community.

- Differences in the availability or distribution of habitats in the city limits would be unlikely to result in any appreciable impacts on populations of plants or animals in and near Seattle.
- Encouraging residential and commercial development within the urban environment of Seattle could indirectly benefit plants and animals by easing development pressure in less-developed areas outside the city. The focus of growth inside urban areas is consistent with VISION 2050 regional growth strategy for many considerations including environmental conservation.

Comment Theme: *What analysis shows that tree planting programs, coupled with increased hardscape, will compensate for lost urban forest?*

Response: Planting new trees to replace trees that are removed for development is a fundamental aspect of urban forest management. This approach—combined with regulations and incentives that encourage the retention of existing trees—has been used for decades by forest managers to maintain forest canopy in urban areas.

Comment Theme: *How would alternatives affect the 30% tree canopy goal?*

Response: Many factors beyond this proposal will influence canopy cover change over the next 13 years including property owner preferences, city investments, climate change, pests, tree diseases, invasive species, and forest restoration efforts. It would be overly speculative for this EIS to predict how each of the factors that are outside the change analyzed in this EIS may result in an increase or reduction in canopy cover. See Final EIS **Section 3.3.3** for a discussion of action alternative policies designed to maintain and enhance tree canopy. These policies would be expected to contribute to the City's goal of 30% tree canopy cover. Examples of policies in the Proposed Plan that would encourage progress toward the 30% goal include the following:

- Encourage the preservation and expansion of the tree canopy throughout the city... (Excerpt of policy LU 2.7)
- Monitor changes and trends in the amount, distribution, and condition of the urban forest and use this information to shape urban forestry management plans, decisions, and actions. (Policy CE 12.5)
- Preserve, restore, maintain, and enhance the urban forest across the city. (CE 12.2)
- Enhance and expand tree canopy and landscaping in the street right-of-way. (T 5.10)
- Expand tree canopy and greenspace, especially in communities that experience disproportionate impacts of extreme heat and smoke events. (CE 9.3)
- Maintain and expand cooperative agreements with … public and private agencies to provide or expand access to open spaces they control and increase the tree canopy and green space they provide. (P 1.17)

Letter 95 & Similar

Comment Theme: *The Draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.*

> **Response:** Tree regulations do not require retention of 6" DSH trees and code changes regarding trees are not part of the proposals. See the evaluation of the Preferred Alternative in **Section 3.6.2** regarding Urban Form and Tree Canopy for the zoning standards for buildings that could improve chances at keeping tree canopy.
>
> As discussed in EIS **Section 3.3.3**, the action alternatives evaluated in the EIS include policies to maintain and enhance tree canopy, including encouraging the preservation and expansion of the tree canopy throughout the city for the aesthetic, health, and environmental benefits trees provide. In addition, action alternatives amend the Comprehensive Plan by adding climate resilience strategies that include reducing heat islands and increasing tree canopy.

Comment Theme: *The Draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover."*

> **Response:** The alternatives evaluated in this EIS do not represent a specific action at a specific time and place. Instead, they are alternative approaches to achieving the goals and policies laid out in the One Seattle Plan, which will direct future growth in certain place types as shown on the Future Land Use Map. Given the programmatic, non-project nature of the One Seattle Plan, a quantitative analysis of the alternatives' impacts on trees over the 20-year planning period would be speculative. Instead, as described in the discussion of Impacts Common to All Alternatives (**page 3.3-14**), the Final EIS evaluates each alternative's potential to contribute to reductions in tree canopy cover, based on the amount of area available for conversion to higher-density uses and the amount of area redeveloped for housing. For the Final EIS, this analysis was expanded to include an evaluation of parcel acres developed with new housing units.
>
> The assessment of the potential for significant unavoidable adverse impacts on tree canopy cover is based on the definition of significant unavoidable adverse impacts ("A substantially increased potential for tree canopy cover loss, compared to the No Action alternative"). As summarized in **Section 3.3.4** of the EIS, none of the action alternatives would be expected to have a substantially higher potential than the No Action alternative to contribute to loss of tree canopy cover for the following reasons:
>
> - The City's current tree protection regulations minimize the potential for development-related loss of tree canopy cover and require mitigation for tree canopy loss for trees 12 inches in DSH or greater, which is more mitigation than previous versions of the City's tree regulations. Further, if development occurs and the City's Tree Protection Ordinance does not require a replaced tree or fee in lieu of

replacement, the land use code may still require a tree to be planted based on the proposed development.

- The action alternatives include policies to maintain and enhance tree canopy.
- The potential for canopy loss due to factors other than development would be the same under all alternatives.

Comment Theme: *No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services, [nor maintenance to ensure survival].*

Response: The analyses in the EIS have been expanded to address the potential for temporal loss (i.e., time lag between the loss of functions provided by removed trees and the replacement those functions by planted trees) of the essential benefits provided by tree canopy cover.

Comment Theme: *Mitigation recommendations:*

- *Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.*
- *Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.*
- *Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.*
- *Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area," which allows removal of almost all large trees.*

Response: The commenter's suggestions for new policies or regulations are noted and forwarded to City decision makers. Code changes regarding trees are not part of the proposals.

The Preferred Alternative, similar to Draft EIS action alternatives, update policies regarding tree canopy. This includes an urban forest and tree canopy section of the Climate and Environment element, as well as policies in other elements to achieve a canopy coverage of 30%, to protect and expand tree canopy such as through public tree planting programs, planting trees in rights of way, and planting in areas subject to extreme heat. Also, policies address adaptive management to monitor and adapt approaches to tree canopy management. These concepts are similar to the mitigation measures in **Section 3.3.3** of the EIS.

Additionally, the Preferred Alternative's proposed zoning supports consolidated open space in the Neighborhood Residential and Lowrise zones that could provide opportunities for plantings. See also, the example Neighborhood Residential Blocks in **Exhibit 3.6-100 through Exhibit 3.6-105**. It has been updated in the Final EIS to annotate tree preservation and replacement opportunities.

Letter 500 (Friends of Seattle's Urban Forest) & Similar

Comment Theme: *Questions about the effectiveness of the Tree Protection Ordinance in maintaining tree canopy, including questions about the availability of areas where replacement trees can be planted. Recommendations for modifying the requirements of the Tree Protection Ordinance.*

> **Response:** This EIS evaluates the potential impacts of alternative approaches to achieving the goals and policies laid out in the One Seattle Plan. The action alternatives include new and amended policies to maintain and enhance tree canopy and to expand tree canopy throughout the community. Analyses in the EIS have been expanded to address the potential for temporal loss (i.e., the time lag between the loss of functions provided by removed trees and the replacement those functions by planted trees) of the essential benefits provided by tree canopy cover. Also please see the response to the question in Letter 83, above, about tree planting programs.

Comment Theme: *When will it be possible to reach the 30% citywide goal? Can the City exceed this goal?*

> **Response:** Please see the response to the question in Letter 83, above, about impacts to tree canopy coverage and 30% tree canopy goal.

Comment Theme: *What is the projected loss in canopy volume over the next 20 years as big conifer trees and others are removed?*

> **Response:** Given the programmatic, non-project nature of the One Seattle Plan, a quantitative analysis of the alternatives' impacts on trees over the 20-year planning period would be speculative. Instead, as described in the discussion of Impacts Common to All Alternatives in, the Final EIS (in **Section 3.3.2**) evaluates each alternative's potential to contribute to reductions in tree canopy cover, based on the amount of area available for conversion to higher-density uses and the amount of area redeveloped for housing. For the Final EIS, this analysis includes an evaluation of parcel acres developed with new housing units.

Comment Theme: *Can coniferous tree canopy volume removed for development be replaced in a reasonable amount of time?*

> **Response:** The analyses in the Final EIS have been expanded to address the potential for temporal loss (i.e., time lag between the loss of functions provided by removed trees and the replacement those functions by planted trees) of the essential benefits provided by tree canopy cover.

Comment Theme: *What is the projected increase in stormwater runoff? What costs are associated with on-site and alternative city water management policies of stormwater and pollutant runoff as a result?*

Response: The potential effects of the alternatives on stormwater runoff and associated policies are evaluated in **Section 3.1.3**. Potential effects relating to the management of the City's and drainage systems are addressed in **Section 3.12.3**.

4.2.1.3 Studied Growth & Revisions to Increase Capacity

This section addresses studied growth, changes to dimensional standards to increase capacity in centers, additional and/or expanded neighborhood centers, and parking minimums.

Comment Theme: *Plan for additional growth beyond the 120,000 housing units and 158,000 jobs studied under Alternative 5.*

Response: The growth target included in the Proposed Plan is 80,000 dwellings and 158,000 jobs. The Final EIS Preferred Alternative provides analysis of additional housing capacity up to 120,000 dwellings through the year 2044 in the event that the growth over the next 20 years exceeds the growth target in the Proposed Plan.

Comment Theme: *Consider changes to zoning and dimensional standards to increase capacity in centers (e.g., increased heights, remove restrictions on building lengths, revise upper-level floorplate limits and remove upper-level setbacks in regional and urban centers, remove upper-level setbacks).*

Response: The commenter's suggestions for new zoning and dimensional standards are noted and forwarded to City decision makers. Please see the description of the alternatives and code proposals in **Section 2.4**. Also see the proposed Phase 1 Legislation in **Appendix J**.

Comment Theme: *Consider adding or expanding neighborhood centers.*

Response: The commenter's suggestions are noted and forwarded to City decision makers. See the proposed neighborhood centers as part of the action alternatives including the Preferred Alternative.

Comment Theme: *Allow corner stores in more places—not just in centers.*

Response: The commenter's suggestions are noted and forwarded to City decision makers. Alternative 3 identified the concept of flexibility in urban neighborhood areas for missing middle housing as well as corner stores and at-home businesses. See **Section 2.4.3**.

Comment Theme: *Allow multifamily housing close to all of our major parks. Ensure green space and open space for housing; do not turn parks into housing.*

Response: With action alternatives, the City is adding capacity for new housing across the city including in mixed use centers and in low density residential areas with middle housing that could increase density near parks. See **Section 3.11 Public Services**

regarding demand for parks under each alternative. The 2024 Parks and Open Space (POS) Plan also identifies a long-term acquisition strategy for natural areas, and parks in a 5-minute walk in urban centers and areas outside urban centers with a 10-minute walk (see EIS **Exhibit 3.11-26**).

Comment Theme: *Eliminate parking minimums, citywide or in certain centers, to support more TOD development in Seattle.*

Response: The commenter's suggestions for parking standards are noted and forwarded to City decision makers. The EIS addresses concepts for amended codes including reducing or eliminating residential parking minimums citywide. See **Section 1.4.9** and **Section 2.4**. Parking and urban form are topics in **Section 3.6**. While eliminating parking minimums may be pursued by the City, the Final EIS does not include an analysis of its effects in **Section 3.10 Transportation** because it is not a specific proposal of the Preferred Alternative nor must amendments to remove parking from development be analyzed under SEPA. See RCW 43.21c.450.

As part of the Preferred Alternative and associated Phase 1 legislation the City is addressing parking reform per SB 6015 for residential development. See **Appendix J**.

4.2.1.4 Economic or Market Analysis

Comment Theme*: Request for economic feasibility, cost-estimates, or market analysis.*

Response: SEPA does not require cost-benefit or economic analysis (WAC 197-11-448 and 450). Economic feasibility of development is affected by many factors, including unpredictable and frequently changing market conditions. The time horizon of the EIS is over 20 years, and factors that affect the short-term feasibility of development are likely to change over the study period.

4.2.2 Comment and Responses Matrix

Marked comment letters are included in **Appendix K**. In the matrix below, comments are summarized and responses are provided for each comment. Comments that state preferences on alternatives or other matters are acknowledged with a response that the comment is noted and forwarded to City decision makers. Comments that address methods, analysis results, mitigation, or other matters are provided a response.

The remaining sections are organized to group comments as follows:

- Tribes
- Agencies
- Interest Groups and Businesses
- Property Specific
- Individuals

4.2.2.1 Tribes

Exhibit 4.2-1. Written Comments and Responses, 2024—Tribes

Number	Comment Summary	Response
1	Spiry, Martin, Moses	The Snoqualmie Tribe
1-1	The Study Area should be expanded to include waters and lands affected by City Utilities and city owned properties outside of City limits.	The Comprehensive Plan applies to the Seattle city limits and is intended to address Growth Management Act requirements for a periodic update. The City plans for its public facilities serving planned growth through the Capital Facilities Plan. Capital facilities outside the city limits are subject to Seattle system plans and the land use, critical areas, and additional development regulations of other local government agencies who likewise must address public facilities in their Comprehensive Plans. When the City adopts system plans for utilities, it would be subject to SEPA review unless exempt. The facilities must also meet state and federal requirements. The City's Comprehensive Plan and other local government Comprehensive Plans attain consistency by following PSRC Multicounty Planning Policies and King County Countywide Planning Policies.
1-2	Lacks analysis of policies regarding tree canopy. Analyze effects of its interpretation of "equity" regarding tree canopy.	Please see EIS **Section 3.3.2** (Impacts—Plants and Animals) for analyses of the potential for the alternatives to result in tree canopy loss that would contribute to adverse effects on disadvantaged populations.
1-3	General comment about the history of the City of Seattle.	Comments are noted. Please see edits to the Cultural Resources text to include the Snoqualmie Tribe's clarifications to the context of Seattle's history in **Section 3.9.2**.

4.2.2.2 Agencies

Exhibit 4.2-2. Written Comments and Responses, 2024—Agencies

Number	Comment Summary	Response
2	Representative Pollet	Representative Gerry Pollet 46th District
2-1	Request to partner to update the housing provisions to fully realize collective bold vision that encourages the development of dense and vibrant communities.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives, so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers
2-2	The Plan fails to provide any plan to meet needs for housing units for households at every economic/income level, or prevent displacement in identified areas. The plan does not increase the level of growth in housing units	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives, so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.

Number	Comment Summary	Response
	that is adequate. Increase number of neighborhood centers,	
2-3	Missing opportunity to develop a plan to attract and retain families with school age children, essential workers in healthcare, education, other public services, hospitality, etc. Several strategies listed including HALA program, tax increment financing, Multi Family Tax Exemption etc.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives, so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
2-4	The Plan fails to address new statutory requirements for consideration of climate change and environmental justice including backsliding on goal to have 30% tree canopy by 2037.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives, so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. The EIS includes climate and equity metrics and each chapter addresses these metrics. The City completed a Climate Vulnerability Assessment (2023) per a grant. The City has developed a Draft Climate and Environment Element. Still, the City may do more to meet HB 1181 and has until 2029 to fully address requirements. The City adopted new tree canopy regulations in 2023 meant to further address tree retention and mitigation, and the Final EIS includes a review of developable land and tree canopy while providing Neighborhood Residential typologies that indicate how new units could be designed to avoid impacts to trees.
2-5	The urban center at NE 130th St should have additional planning with additional density along Roosevelt Way NE.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives, so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
2-6	The plan fails to reflect requirements of HB 1220 and ensure there is housing for each economic segment of the population. Another 11,570 units affordable for households earning 50-80% AMI should be in the Plan's goals.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives, so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. See Draft Housing Appendix and Supplemental Tables, available at the project website: https://www.seattle.gov/opcd/one-seattle-plan.
2-7	Tree preservation and other environmental elements are not adequately addressed. Required mitigation measures to achieve policies are not addressed or proposed. How will the City "encourage" protection, maintenance, and expansion of tree canopy? Many suggestions and questions such as; if increasing	Comments are noted. **Section 3.3.3** of the Final EIS describes how the existing tree ordinance (recently adopted in 2023 and upheld by the Washington Growth Management Hearings Board) encourages protection, maintenance, and expansion of tree canopy, and that the action alternatives include policies designed to maintain and enhance tree canopy in the city. The No Action and Preferred alternatives were evaluated in light of the 2023 tree protection code. The Final EIS illustrates how Neighborhood Residential code parameters, design choices, and parking can impact space for

Number	Comment Summary	Response
	height and housing units near parks, address how increasing height and development FAR will impact natural habitat within park boundaries.	trees in middle housing type developments (**Exhibit 3.6-106**). Several of these examples include adequate space for preserved trees while meeting housing goals. In addition, Neighborhood Residential developments will be required to include 20% shared open space, which must be at least 10' by 10', providing some space for preserving or planting small trees. Comments are noted on the development standard mitigation suggestions. Potential mitigation measures for tree canopy, noted in the Final EIS in **Section 3.3.3**, include requirements for tree planting with redevelopment in Neighborhood Residential zones, a focus on funding for trees, especially in public rights-of-way and parks, height incentive for providing ground floor open space, and promotion of narrower building footprints. Further tree canopy policies, regulations, and potential mitigation measures are included in the Plants & Animals chapter **pages 3.3-31 through 3.3-36**. The Preferred Alternative proposes updated policies to protect and enhance tree canopy. The Preferred Alternative also proposes development regulations that improve chances of increasing tree canopy per **Section 4.2.1.2**. Please also see revisions to **Section 3.3.2** that describe the potential for new growth to be developed adjacent to parks and minimization of impacts due to location of streets, zoning based height limits, and tree retention regulations.
3	**Representative Pollet**	**Representative Gerry Pollet 46th District**
3-1	Urge adoption of increased goal for housing units and meet requirements of HB 1220.	See response to Comment 2-6.
3-2	There are no meaningful discussion, new proposals or consideration in the Plan of appropriate policies to prevent displacement in identified areas with high displacement potential.	See response to Comment 2-3.
3-3	The Plan and EIS fails to address new statutory requirements for consideration of climate change and environmental justice, including backsliding on adopted goal to have 30% tree canopy by 2037.	See response to Comment 2-4.
4	**Hollingsworth**	**District 3 Seattle City Council**
4-1	Concern that the baseline and all alternatives plan for addition of 158,000 jobs suggest that varying number of people must live outside the city and commute in for work. For transportation; include analysis of each alternative the transportation impacts that are caused by imbalance between	The EIS analysis uses the PSRC regional travel demand model to estimate the travel patterns that would result from each land use alternative. The model includes the entire PSRC four-county region (King, Kitsap, Snohomish, and Pierce) and captures commute trip behavior beyond city limits. Therefore, the transportation analysis provided in the EIS reflects the travel behavior variations that would result from the jobs-housing balance assumed with each alternative.

Number	Comment Summary	Response
	projected new jobs vs. projected number of new housing units.	
4-2	Account for the changes to GHG emissions that result from imbalance between housing increases and job increases in each of the alternatives.	GHG emissions analysis of the county and region are addressed through VISION 2050 adopted by the Puget Sound Regional Council (PSRC). The City is planning for growth consistent with the regional growth strategy. The EIS analysis of GHG emissions for each alternative includes transportation emissions. The GHG analysis uses the vehicle miles traveled (VMT) data provided by the transportation analysis. As stated above in response to Comment 4-1, the transportation analysis provided in the EIS and used in the GHG analysis reflects the travel behavior variations that would result from the jobs-housing balance assumed with each alternative.
4-3	Analyze effects of habitat loss, aquatic environmental health, and tree canopy outside city limits.	VISION 2050 and its SEIS provides an evaluation of regional growth and a unified growth strategy and multicounty planning policies to reduce impacts. Each jurisdiction is undergoing their own review of their respective Comprehensive Plans, and impacts of meeting their growth targets. Each community completes its own evaluation of growth and must protect critical areas. With requirements of HB 1181 jurisdictions in the four-county area with develop tree canopy evaluations by 2029. Even though the City was allocated 80,000 new units consistent with VISION 2050 and Countywide Planning Policies, the City considered growth up to 120,000 dwelling units to consider additional housing supply and affordability options in the city which could have the effect of a smaller growth in rural areas as noted on Final EIS **page 3.1-22**. The City is analyzing environmental impacts of various alternatives to implement the One Seattle Plan. The One Seattle Plan does not propose any land use changes outside the City of Seattle with the limited exception of identification of possible annexation areas. The EIS analyzes likely environmental impacts of the proposed alternatives within the city limits.
4-4	Analyze how each alternatives changes the supply of housing suitable for households with children, and supply of housing for middle-income households.	Please see **Section 4.2.1.1** regarding the **Affordable Housing Evaluation** under HB 1220. Please also see **Section 3.8** of the EIS which addresses the affordability and variety of housing types under each alternative.
4-5	Ensure final EIS not preclude zoning changes in the Comprehensive Plan that would bring all or substantially all the multiple family structures built prior to 1957 to conforming status in the zone they reside in as of April 2024.	The Final EIS compares a range of growth alternatives to identify any adverse environmental impacts and associated mitigation strategies. None of the alternatives analyzed preclude bringing nonconforming structures into conforming status.
4-6	Ensure the final EIS does not preclude future changes to the Comp Plan that could be used to incentivize the construction of	The Final EIS compares a range of growth alternatives to identify any adverse environmental impacts and associated mitigation strategies. None of the alternatives precludes incentivizing

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	multifamily structures as alternatives to townhomes.	construction of multifamily structures as an alternative to town homes.
5	**Daffern, Goldberg**	**Seattle Planning Commission**
5-1	Highlight aspects that are appreciated including, inclusion of detailed historical context of housing, racial equity, historical harms, exploration around concept of displacement.	Comments noted regarding the Seattle Planning Commission's appreciation for the historic context equity and displacement.
5-2	Overall recommendations including more detailed explanation for how the areas and place types are defined and selected, complete exploration of racial disparities, include Seattle's emergency preparedness and response for earthquakes, Separate 130th/145th street station area, study Planning Commission's recommendation.	**Place Types:** Please see **Section 4.2.1.1** regarding the **Affordable Housing Evaluation** under HB 1220. Please also see **Section 3.8** of the EIS which addresses the affordability and variety of housing types under each alternative. **Racial Disparity:** The Final EIS considers Equity and Climate Change Performance Metrics, June 2022. The metrics address various aspects of overburdened communities, income, race, and other. The City's Race and Social Equity Index is referenced in Transportation and Public Services evaluations. State Department of Health disparities incorporate similar socioeconomic and race information and are considered in Earth & Water Quality and Air Quality & GHG, **Emergency Preparedness, Earthquakes:** Regarding fire and emergency services see Final EIS **Section 3.11**. Building codes and Emergency Response Plans address seismic hazards, and are proposed to be included in Earth & Water Quality mitigation measures. See Final EIS **Section 3.1.3**. **130th/145th Street Station Area Evaluation:** The EIS addresses citywide and station area conditions and potential impacts. Separate subsections call out the impacts. No change is proposed in the Final EIS. **Study Planning Commission Recommendations:** Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives, so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
5-3	Air quality and GHG emission suggestions: study impacts of locating sensitive uses near additional high-volume traffic roadways beyond the freeways.	**Section 3.2 Air Quality** discusses the exposure of air borne toxics along major roadways. **Exhibit 3.2-6** shows a 1,000-foot buffer around roadways and highways with daily trips greater than 100,000 vehicles within the City of Seattle. **Exhibit 3.2-9, Exhibit 3.2-11, Exhibit 3.2-13, Exhibit 3.2-15**, and **Exhibit 3.2-17** highlight the land uses within the 1,000-foot buffer under each of the Alternatives accompanied by discussion of residential units within affected areas. The EIS Air Quality & GHG evaluation references the **Exhibit 3.1-12** Environmental Health Disparities in **Section 3.1 Earth & Water Quality**. It identifies the neighborhoods most affected by health disparities. The combination of the air borne toxics analysis with high volume roads and reference to the state index

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		addresses the city as a whole. Therefore, no further study is required.
5-4	Land Use Patterns and Urban Form suggestions include more detail and context on negative land use impacts and consequences of those impacts, emphasize negative impacts resulting from urban growth are expected and only temporary, highlight both positive and negative equity impacts.	As noted, the "negative" land use impacts of urban growth are expected and temporary, and thus, did not warrant additional analysis beyond disclosing the potential changes in the EIS. Many of these are also considered positive impacts (e.g., greater mixing of uses). Additional analysis for urban form impacts from allowances for middle housing are under **Appendix G.2** Updating Seattle's Neighborhood Residential zones. The comment to emphasize that no significant unavoidable adverse impacts to land use patterns, compatibility, or urban form are expected under any of the alternatives is noted. The comment to highlight the positive and negative equity impacts, as described in the Equity and Climate Vulnerability sections, is noted. Climate Resilience Opportunities are included in the Seattle Climate Vulnerability Assessment, July 2023, and the City has developed a Climate and Environment Element with policies addressing sea level rise. The City has also recently developed flood regulations updates addressing sea level rise. These are added as mitigation measures in **Section 3.1.3**.
5-5	Population, Housing, and Employment suggestions: provide additional employment analysis related to changing nature of work location post pandemic, study impacts of anti-displacement policies beyond MHA, study housing affordability and supply more deeply, add discussion of housing choice in areas of high opportunity.	**Employment:** The alternatives consider employment growth targets from VISION 2050 and Countywide Planning Policies. Action alternatives account for a redirection employment that are associated with changing nature of work and home; about 15% of new jobs in each action Alternative are assumed to be located in proportion to the location of new housing. (See for example Pages 2-2 to 2-4 and the tables identifying job assumptions for each alternative in Sections 2.4.2 to 2.4.5.) This assumption would account for the desire of many businesses such as local retail, eating places, and services, to locate near housing. **Anti-displacement:** MHA and MFTE are the two affordable housing policies in Seattle that are directly tied to new development activity. This is because the amount and location of new affordable housing generated through these programs is dependent on the amount and location of new multifamily housing development. Therefore, these are the only anti-displacement policies that are expected to be impacted by the alternatives. **Section 3.8.3** identifies other anti-displacement measures that are included in all alternatives, as well as other potential mitigation measures that the city could pursue. **Affordability and Supply:** As described above, MHA and MFTE are the only programs for supporting affordable housing production that are expected to be impacted by the action alternatives. Therefore, the comparison of affordable housing supply impacts focuses on impacts to these programs. **Section 3.8.3** identifies other affordable housing measures that are included in all alternatives, as well as other potential mitigation measures that the city could pursue. **Housing Choices in High Opportunity Areas:** See Response to Comment 5-2.

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5-6	Transportation suggestions include adding relationship between transportation analysis for Draft EIS and Seattle Transportation Plan, more information on significant unavoidable adverse impact to transit capacity, and accessible language should be used to present results of the impact analysis.	The EIS includes a summary of existing conditions for reference, but all impact analysis is based on analysis using the 2044 proposed land use alternatives. The commenter requests more information on whether the EIS mitigation measures are consistent with those proposed in the STP. Targeted transportation capacity improvements—see Appendix A Large Capital Project Summary Sheets of the STP which include potential multimodal improvements to N 130th Street, NE 145th Street, 15th Avenue NE, and Aurora Avenue N (note SDOT may choose not to pursue general purpose vehicle capacity increases). Bicycle, pedestrian, and freight connections: see Bicycle and E-Mobility Element, Pedestrian Element, and Freight and Urban Goods Movement Element in STP Part 2. Demand management using policies, programs, and investments aimed at shifting travel to modes other than single occupant vehicles – see Climate Action Key Move in STP Part 1. The commenter requests information on the potential magnitude of the transit capacity impact. This information is presented in **Section 3.10.2** of the Final EIS with maximum passenger load factors (the ratio of passengers to crowd thresholds for bus or light rail) for each alternative. The Final EIS has been updated to include a more reader-friendly explanation of the analysis.
6	**McCoy**	**Department of Commerce**
6-1	Land use element suggestions: include population projections as required by GMA, and provide draft of all associated development regulations and zoning updates in order to be reviewed for consistency with GMA.	The comment is noted. The Proposed Plan includes information on the housing growth target and jobs growth target that were adopted by the Growth Management Planning Council for the City of Seattle in the Land Use Element. Estimates reported in the EIS use an assumed persons per household (pph) to convert Seattle's housing growth target to population.
6-2	Housing element suggestions: include a policy on a variety of moderate density housing types, provide supporting documentation indicating sufficient land capacity for emergency housing and shelter, strategies identified in the "Actions to Address Barriers" do not appear to clearly address barriers to housing across all income levels, include a review of housing element policies that led to racially disparate impacts in the Housing Appendix.	**Section 3.1** of the Final EIS provides an analysis of the potential impacts to Earth and Water Quality. **Section 3.1.2** analyzes the potential impacts associated with each alternative and finds that there are no significant unavoidable adverse impacts. **Section 3.3** of the Final EIS provides an analysis of the potential impacts to plants and animals, including tree canopy. **Section 3.3.2** analyzes the potential impacts associated with each alternative and finds that there would be no significant, unavoidable adverse impacts on tree canopy.
6-3	Transportation element suggestions include adding a transition plan for transportation per Title II of the ADA, add detailed description of each demand management strategy, detailed	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives, so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.

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	discussion of how additional funds will be raised and how land use assumptions will be reassessed, expand discussion on compatible airport siting.	
6-4	Capital facilities element suggestions include adding an inventory of existing capital facilities, forecast of future needs, capacities of expanded or new capital facilities, and a policy or procedure to reassess directly in the capital facilities element.	Comment noted. See the Proposed Plan, Capital Facility Element. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives, so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
6-5	Utilities element suggestion include an inventory of existing utilities consisting of location, proposed location, and capacity of existing and proposed utilities.	Comment noted. See the Proposed Plan, Utilities Element. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives, so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.

4.2.2.3 Interest Groups/Businesses

Exhibit 4.2-3. Written Comments and Responses, 2024—Interest Group/Businesses

Number	Comment Summary	Response
7	**Cooke**	**Blue Rooster Building East LLC**
7-1	The Plan does not go far enough to address the current housing deficit and future demand. Reconsider the 20 year incremental planning horizon when strategizing for growth.	The 20-year planning period is based on the Growth Management Act requirements. RCW 36.70A.110. The City has examined alternatives that address the growth target assigned (Alternative 1, No Action) as well as growth beyond that (20,000-40,000 units in Alternatives 2 to 5 and the Preferred Alternative in this Final EIS).
7-2	Expand the Fremont Hub Urban Village Boundaries to incorporate underutilized or undeveloped properties. Support for Alternative 4 and 5.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives, so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
8	**Healey**	**Vulcan Real Estate**
8-1	The City can go even further to support steady housing and job growth over the next two decades.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives, so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
8-2	Provide further analysis of Sound Transit's Plans and articulate the City's preferred direction in order to maintain South Lake Union as a thriving jobs center.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives, so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.

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8-3	Identify a higher level of job growth to ensure a thriving economy.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives, so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. All alternatives can meet employment growth targets. The plan is updated every 10 years and can be adjusted as needed if job growth changes.
8-4	Take a bolder, clearer approach to zoning changes in regional centers and urban centers, while recognizing the benefits of neighborhood centers.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives, so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
8-5	Identifies strategies to reduce costs and restore regulatory certainty including reforms in permitting processes and regulatory programs.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. Please see **Appendix C** regarding infill exemptions that are meant to facilitate permitting of housing. The City may alternatively modify SEPA thresholds under WAC 197-11-800(1)(d).
9	**McCullough**	**McCullough Hill PLLC**
9-1	Set of 10 proposed text amendment to residential uses in existing buildings in II zones.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
10	**Connell**	**Holland Partner Group**
10-1	Support Draft EIS Alternative 5, which anticipates the largest increase in supply of housing, designates Ballard a regional center, and proposes to expand Uptown's Regional Center boundaries as well as several other urban centers, but the final Plan and Final EIS should also include more information about the likely increases in density in the regional centers and urban centers. Additional growth potential should be identified for regional and urban centers, and make baseline changes (including building height, building lengths, Floorplates, and setbacks) ahead of any future subarea planning work.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives, so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. Later in 2025, OPCD will begin studying potential increases in density in urban centers and regional centers. See also **Section 4.2.1.3** regarding studied growth and changes to dimensional standards to increase capacity in centers.
10-2	Support the neighborhood center concept, but suggest a few adjustments including additional	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives, so no response is required. Desired policy changes

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	neighborhood centers, expand radius, and increase height limits.	related to the One Seattle Plan will be forwarded to decision makers. See also **Section 4.2.1.3** regarding changes to dimensional standards to increase capacity in centers and additional and/or expanded neighborhood centers.
10-3	The Draft EIS anticipates 158,000 new jobs from 2024-2044 under all alternatives studied, but it does not articulate the strategies the City will employ to achieve this level of job growth. Articulate a plan for supporting job growth and commercial development if the City's planning efforts are to be truly competitive.	All alternatives can meet employment growth targets. The plan is updated every 10 years and can be adjusted as needed if job growth changes.
10-4	Eliminate parking minimums to support the development of a more transit-oriented city.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives, so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. See also **Section 4.2.1.3** regarding elimination of parking minimums.
11	**Gunter**	**Alexandria Real Estate Equities**
11-1	Prioritize and incentivize life sciences investment. Example suggestions for Final Plan and EIS included studying development standards to accommodate needs of life sciences industry such as allowances for additional rooftop mechanical equipment, electrical system redundancy and flexibility in energy code requirements.	Prioritization or incentivizing life sciences beyond what the Comprehensive Plan and current development regulations allow is a policy decision and outside the scope of the EIS. The comments are noted and forwarded to City decision makers. The EIS studies employment growth in the city. The Proposed Plan refers to life sciences in its Economic Development Element. The current and proposed plan allow for life sciences.
11-2	Include more detailed analysis of impacts under a range of different scenarios for employment and the economy, and articulate bold life sciences economic development strategy.	All alternatives can meet employment growth targets. The plan is updated every 10 years and can be adjusted as needed if job growth changes. See Response to Comment 11-1 too.
11-3	Support Life sciences by providing greater clarity in its approach to additional density in regional centers and urban centers.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives, so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
12	**Sanderson, Lee, Pham, Merriweather**	**Crescent Collaborative**
12-1	Replace the Draft Plan growth strategy with Alternative 5.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives, so no response is required. Desired policy changes

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		related to the One Seattle Plan will be forwarded to decision makers.
12-2	Build more family sized housing, and identify and mitigate current zoning regulations with discriminatory effects and racially disparate impacts.	The comments are noted and forwarded to City decision makers. The Proposed Plan and Final EIS considers a household size consistent with regional evaluations per response to Comment 6-1. The Alternatives consider different Place Types allowing for a range of housing of different sizes to accommodate different household sizes. The Alternatives consider different levels of housing units in the future that could address the different future populations in the city.
12-3	Add to and expand anti-displacement strategies in collaboration with impacted communities. Include stronger tools to ensure that growth is equitable such as increasing support for affordable housing, strengthening tenant protections, endorsing state-level rent stabilization laws, assisting homeowners involved in equitable housing development, promoting land banking, and more.	The comments are noted and forwarded to City decision makers. As part of HB 1220 requirements the City must provide capacity for housing at different income levels and housing types. The updated Housing Element and codes are to address removal of barriers to housing including ensuring anti-displacement measures. See the City's draft anti-displacement framework and appendix. This evaluation is updated with the Proposed Plan. See **Section 4.2.1.1 Affordable Housing Evaluation**.
13	**Martin**	**Futurewise**
13-1	Ensure adequate public services and facilities for Seattle's growth targets.	The City's current plans and code are still in place and address the horizon to the year 2035. There is not a gap in services or facilities standards. City regulations addressing services and facilities are in place such as those identified in **Appendix C** for infill development. Refer to Final EIS **Section 3.11** regarding impacts to public services of the Preferred Alternative. See the City's One Seattle Capital Facilities Appendix and Utilities Appendix for discussion of future growth,
13-2	Adopt a goal-oriented approach for converting housing units to population and take steps to mitigate current zoning regulations with discriminatory effects and/or racially disparate impacts.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives, so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. See Responses to Letter 12.
13-3	Quantify the relationship between zoning and racial demographics for current and proposed growth strategies.	The comments are noted and forwarded to City decision makers. The City has addressed HB 1220 requirements in its Draft Housing Element and Draft Housing Appendix. See also the response to Comment 12-3.
13-4	Plan for substantially more housing production in low-displacement risk areas to address racial disparities.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. The City has developed an analysis of racially disparate impacts in its Draft Housing Element and Draft Housing Appendix. Equity

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		in relation to parks is addressed in the City's PROS Plan and also described on EIS in **Section 3.11**.
13-5	Increase the ability of all residents to live in the neighborhood of their choice by expanding missing middle affordable housing incentive program and ensure distribution of new neighborhood centers.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives, so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
13-6	Plan for centers near new light rail stations and regional centers in South Seattle and West Seattle.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives, so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
13-7	Support for Alternative 5.	The preference for Alternative 5 is noted. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
13-8	Prioritize carbon-neutral transportation modes.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives, so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
13-9	Revise the regulatory barrier analysis to follow Department of Commerce guidance by including review of specific barriers to a variety of household size for those affordability levels.	The comments are noted and forwarded to City decision makers. The City has addressed HB 1220 requirements in its Proposed Plan Housing Element and Housing Appendix. See **Section 4.2.1.1 Affordable Housing Evaluation**.
13-10	A list of housing related changes; summarize development capacity by projected housing need category for the Final EIS Preferred Alternative, increase FAR maximum, expand mandatory housing affordability program, add to and expand anti-displacement strategies in collaboration with impacted communities.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives, so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
14	**Duvall**	**NAIOP Washington State**
14-1	Support Alternative 5, including added development capacity in the "new place types," and identified areas where the City could go farther to achieve the city's goals: Regional Centers, Corridors, Neighborhoods, Citywide Bonuses, Mass Timber Bonus, and Housing	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives, so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. Regarding options for non-industrial uses in the MIC, please see the Final EIS for the Seattle Industrial and Maritime Strategy September 2022.

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	in the MIC on Catalyst Sites and No MHA.	
14-2	Suggest flexible street level uses and interim MHA fee exemption for the downtown revitalization efforts.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives, so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
14-3	Identify level of economic growth necessary for a successful economy and plan for that. Concern that there lacks a specific economic development strategy.	See response to Comment 8-3.
14-4	Land use entitlements for development City-wider should be simplified and shortened.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives, so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
14-5	Decline any proposal to raise MHA fees in the short term, and any other types of impact fees, including transportation impact fees.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives, so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
15	**Boyd**	**Bellwether Housing**
15-1	Move forward with the completion and implementation of the Downtown Subarea Plan. Study and support plans for additional height and density allowances throughout Seattle. Alternative should be studied that creates a better balance between new jobs and new housing units in downtown.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives, so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. Please also note that Seattle is considered a Core City under the PSRC VISION 2050 per **Section 3.7 Relationship to Plans, Policies, & Regulations** and Downtown serves as a regional jobs hub.
16	**Bertolet**	**Sightline**
16-1	Get the zoning details right for middle housing to ensure that its feasible to build and can provide family-size and accessible homes. Boost allowances for bigger apartment buildings throughout the city to create more homes more people can afford in places with access to opportunity and transportation options. Eliminate requirements for off-street parking citywide. See attached article.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives, so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. See also Response to Comment 7-1.

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17	**Woo**	**Historic Seattle**
17-1	Correction on the NRHP and WHR Listed Architectural Districts and Properties the Nuclear Reactor Building at UW was listed in the National Register but it was demolished by UW in 2016.	Per Historic Seattle's comment the Final EIS is edited for clarity. See **Section 3.9.1, Exhibit 3.9-13**.
17-2	More information about modifying demolition review process so that historic review occurs even if SEPA thresholds are increased.	In **Section 3.9 Cultural Resources** one example of a possible mitigation measure the City could implement is to modify the demolition review process to include historic reviews for properties that do not meet the review criteria, even if the SEPA thresholds were increased. Broadening the use of historic reviews might help to catch properties that have historical significance but that could be missed without such a review.
18	**Martin, Simpson**	**Complete Communities Coalition**
18-1	Concerns that the policies are too similar to the City's current policies to create significant change. Recommend Final EIS designate a "preferred alternative" based on the OPCD Draft Plan and modified version of Alternative 5. The Final EIS should include a table that summarizes zoned land development capacity analysis and projected housing needs for the Preferred Alternative.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives, so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. The City is required to identify the capacity to meet housing targets by affordability band in its Housing Element. See **Section 4.2.1.1 Affordable Housing Evaluation**.
18-2	Expand potential for growth in urban and regional centers by increasing the area they cover and the intensity of development allowed. List of specific regional growth centers and urban centers to include, expand, and study in Final EIS.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives, so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. Overall growth by area and centers types are included in the Final EIS similar to the Draft EIS.
18-3	Support for neighborhood centers with a list of requests including a list of additional neighborhood centers to include, expand the radii to ¼ mile to support a small cluster of mixed-use development, increase FAR, height limits to 85 feet, and study potential adverse environmental impacts.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives, so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. See also **Section 4.2.1.3** regarding changes to dimensional standards to in centers and additional and/or expanded neighborhood centers.
18-4	Support for increased "Corridor" growth strategy by allowing midrise housing up to 85 feet in height, add the corridor place type to policies that reference the three	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives, so no response is required. Desired policy changes

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	centers, impose a maximum FAR no lower than 2.0 multifamily development, and allow mixed use residential development.	related to the One Seattle Plan will be forwarded to decision makers.
18-5	In regard to Urban Neighborhoods and middle housing, a list of suggested recommendations including but not limited to increasing allowed FAR for middle housing, create 0.2 FAR bonus for stacked flats, 0.1 FAR bonus for each MFTE, allow subdivision of lots into lots less than 1,000 square feet etc.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives, so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
18-6	In regard to Affordable Housing and Social Housing, a list of recommendations including but not limited to revising the proposed affordable housing bonus to ensure it is usable by broad range of developers, increase the propped lot coverage from 60-70%. Allow proposed affordable housing bonus to be used outside of frequent transit, etc.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives, so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
18-7	A list of recommendations to go beyond current equitable development and anti-displacement strategies and programs with specific tools and policies.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives, so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
18-8	Multifamily Housing mapping errors, if not corrected would likely result in a loss of existing zoned housing capacity and a reduction in the fifteen-minute walkable neighborhoods.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives, so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
18-9	Support for Goal TG1 and recommendation to prioritize proximity-based strategies over mobility-based ones, and a list of transportation recommendations.	The commenter requests a study of the environmental impacts of revising the City's parking requirement policies. See **Section 4.2.1.3 Studied Growth & Revisions to Increase Capacity**.
18-10	Additional specific climate goals that prioritize transportation mode shift toward active mobility options, and building de-carbonization.	The commenter encourages the City to set additional specific climate goals that will allow for progress to be accurately assessed on an ongoing basis. **Section 3.2 Air Quality** discusses current regulations and commitments including ongoing Building Tune-Ups to achieve energy and water efficiency, elimination of fossil fuels from water heating and space heating in new construction consistent with City of Seattle Building Energy Code,

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		the tracking and reporting of energy performance pursuant to the City of Seattle Building Energy Code, and commitment to Seattle's Transportation Electrification Blueprint. The City's commitment to ongoing regulations would allow for ongoing assessment and continued progress toward emissions reduction goals. The commenter requests additional discussion of Alternative 1's impact conclusion of no significant adverse impact. The commenter points out that Alternative 1 would result in increased VMT. However as shown in **Exhibit 3.2-7**, Alternative 1 would result in the lowest increase in VMT and least amount of VMT-related GHG emissions when compared to Alternatives 2 through 5. As discussed in **Section 3.2 Air Quality**, all five alternatives would result in lower GHG emissions on a per capita basis compared to existing conditions and alternatives would not prevent or deter statewide, regional, or local efforts to reduce GHG emissions. Therefore, the finding of no significant adverse impact for Alternative 1 is accurate. Further, the commenter notes that they agree with the statement that "while each alternative would generate GHG emissions from growth and development within the city, the benefit of channeling development to targeted areas that might otherwise occur in peripheral areas of the city or region could serve to offset these impacts."
19	**Morris**	**Birds Connect Seattle 1**
19-1	Identified potentially development threatened tree canopy in environmental justice priority areas. Estimate 207-217 acres of development threatened tree canopy on private priority.	Comment noted. This comment is beyond the scope of environmental review of the One Seattle Plan, so no response is necessary. See Letter 20. This comment submittal is a repeat of Exhibit A, which is attached to Letter 20.
20	**Morris**	**Birds Connect Seattle 2**
20-1	List of high-level summary of comments and recommendations to strengthen the draft focused on climate mitigation, adaptation, resilience, green jobs and sustainable economy, and tree canopy.	Comment noted. This comment is beyond the scope of environmental review of the One Seattle Plan, so no response is necessary; please see responses to specific comments below.
20-2	Recommendation to revise the climate and sustainability element to be the climate, biodiversity, and sustainability element with track change examples.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives, so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
20-3	Recommendation to increase ambition and specificity of goals and policies related to urban biodiversity by revising policies in the Land Use element,	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives, so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.

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20-4	Adding policies and recommended language changes to the Transportation Element, Economic Development Element, Climate and Environment Element, Parks and Open Space Element,	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives, so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
20-5	Expand conception and expectations of sustainable buildings and City operations to include wildlife safety through changes to the Land Use element, Parks and Open Space Element	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
20-6	Recommendations on the EIS include changes to the threshold of significant for plants and animals, additional information about rare and sensitive species and habitat types, projections of tree retention during development.	**20-6a** (Threshold of Significance): In this Final EIS, the threshold revised the threshold of significance definition for plant and animal species to clarify that the evaluation is not considering only impacts that would affect the survival or recovery of entire species. **20-6b** (evaluate and mitigate for losses of plant and animal populations within city boundaries): The urban ecosystems in Seattle are dramatically different from what the landscape supported before the arrival of Euroamerican settlers. Given this reality—combined with the city's current role in supporting human populations and economic activity—it is inevitable that urban habitats will support plant and animal communities that differ from those that characterized the pre-development landscape. The composition of those communities has been in flux for over a century and will likely continue to change. Managing habitats in the city to maintain wildlife populations in numbers comparable to past estimates is not feasible, nor is it consistent with the GMA goals of encouraging development in urban areas and reducing urban sprawl. Text is added to the EIS, acknowledging the presence of ESA-listed species in marine waters that receive stormwater runoff from the city. As discussed in **Section 3.1.1,** landcover across most of the city has been extensively modified for over a century by development, which has already resulted in long-term impacts to water quality in Elliott Bay. Redevelopment of areas associated with every alternative would be required to install permanent stormwater management systems to mitigate potential impacts from changes to the site runoff. These required stormwater management measures are designed to minimize pollution at the source; remove or reduce the amounts of pollutants in the stormwater before it enters the receiving water; or manage the rate at which stormwater flows into a receiving water, the separated storm conveyance system, or the combined sewer system. Furthermore, other recommended mitigation measures for water quality impacts include stand-alone considerations for reducing pollutants from roadways, which are not expected to be upgraded as part of the parcel redevelopments included in the alternatives.

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		20-6c (concern about tree retention during development, suggestion for alternative analysis approach): See **Exhibit 3.6-100 through Exhibit 3.6-105** in the Final EIS for illustrations of how trees can be retained during redevelopment projects. The Final EIS includes additional illustrations that show how new units in Neighborhood Residential areas can be designed to avoid impacts. It is also important to note that the City's 2023 tree ordinance updates provide strong incentives for prioritizing tree retention over tree replacement. Finally, the action alternatives including the Proposed Plan include policies that would implement a monitoring and adaptive management program to monitor changes and trends in the amount, distribution, and condition of the urban forest and use this information to shape urban forestry management plans, decisions, and actions. The analysis of potential impacts on tree canopy has been updated to incorporate consideration of developable lands, consistent with the approach used in **Section 3.1 Earth & Water Quality**. **20-6d** (concern about underestimate of development-related canopy loss): As was the case during the 5-year period that was evaluated in the 2021 tree canopy assessment, only a small proportion of developable/redevelopable lands will be developed in any given year or 5-year period. Any trees that cannot be retained on such lands will be replaced in accordance with the requirements of the city's tree ordinance. As those trees grow, they will provide canopy cover that matches—and, in cases where replacement ratios exceed 1:1, exceed—the cover on parcels where development occurs. As stated on page 3.3-27 of the Final EIS, existing regulations, in combination with the policies in the One Seattle Plan, are expected to minimize the potential for tree canopy loss by (1) restricting tree removal on private parcels, (2) requiring tree replacement to compensate for unavoidable losses, (3) requiring tree planting in public rights-of-way, and (4) encouraging the preservation and expansion of the tree canopy throughout the city for the aesthetic, health, and environmental benefits trees provide. In addition, action alternatives amend the Comprehensive Plan by adding climate resilience strategies that include reducing heat islands and increasing tree canopy.
21	**McCoy**	**House Our Neighbors**
21-1	Increase FAR for fourplexes and sixplexes and allow for more homes near transit by allowing midrise and mixed-use housing within a 5 minute walk of frequent buses.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
21-2	Expand neighborhood centers by increasing radius to ¼ mile and adding in all neighborhood centers studied in the Draft EIS, ensure	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision

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	density bonuses, increase height limits and green homes in Centers.	makers. See also **Section 4.2.1.3** regarding changes to dimensional standards to increase capacity in centers and additional and/or expanded neighborhood centers.
22	**Chávez**	**Black Home Initiative (BHI) Network**
22-1	The Plan should be bolder to ensure equitable Seattle. Study density bonuses, development regulation flexibility, land incentives and technical assistance.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
22-2	Land use changes to reduce displacement pressures include add all neighborhood centers, increase neighborhood centers to be inclusive of a ¼ mile radius, midrise and mixed use housing within a 5 minute walk of frequent transit, increase height limits, eliminate parking mandates.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
22-3	In Final EIS, study city land banking and land disposition process. Disaggregate projects about the number of housing units per AMI group from the city-level to a neighborhood or district level scale for comparative analysis. Suggest OPCD revisit community groups to present the Final EIS and zoning changes for feedback.	Regarding housing by income level, please see **Section 3.8 Population, Housing, & Employment** part 3.8.2 that compares alternatives, as well as **Section 4.2.1.1 Affordable Housing Evaluation.**
23	**Johnson**	**Friends of Ravenna-Cowen**
23-1	Concern and recommendations around proposed changes to the Neighborhood Residential zone to create an impetus for redevelopment of historic homes within the RCN NHD.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives, so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. Reference to the National Historic District (NHD) designation for Ravenna-Cowen is noted in **Exhibit 3.9-11** of the Final EIS. The commenter quotes draft policies intended to promote historic and cultural resources; the City will identify implementation plans for the One Seattle Plan after it is approved in final form. This also includes implementing policies that allow for middle housing in areas where single family homes are allowed.
23-2	Specific language changes to the Land Use and Housing elements around neighborhood centers, urban centers, and displacement.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives, so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
23-3	Ways the Draft EIS falls short to protect and enhance the natural	**23-3a** (statements in Draft EIS downplay the impacts of development on plants and animals):

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	environment, suggested changes to tree canopy, urban wildlife, mitigation, and access to public open spaces goals and policies.	The analyses in the Final EIS acknowledge the potential for development and redevelopment projects to adversely affect plants and animals. See, for example, the discussions on pages 3.3-13 to 3.3-14 of the Final EIS. See also, responses to comment themes in **Section 4.2.1.2** as well as additional analysis regarding tree canopy and vegetation, and clarifications of thresholds of significance on fish and wildlife in **Section 3.3** of this Final EIS. **23-3b** (concern that the 2023 updates to the tree ordinance are not sufficiently protective of tree canopy): The 2023 tree ordinance updates provide strong incentives for prioritizing tree retention over tree replacement. In addition, the action alternatives include policies that would implement a monitoring and adaptive management program. Information gathered through regular monitoring would be used to assess the City's progress toward meeting the canopy cover goal and to identify actions to improve trends, as needed. **23-3c** (concern about statements regarding potential benefits to plants and animals outside the city limits): Statements in **Section 1.6.3** and **Section 3.3** about potential beneficial impacts on tree canopy in areas outside the city have been revised for clarity. See Final EIS page 3.3-16 for more discussion of the reasoning behind the expectation that encouraging residential and commercial development within the urban environment of Seattle could indirectly benefit plants and animals in less-developed areas outside the city.
24	**Stewart**	**Ballard Alliance**
24-1	Suggested changes and areas for further review specific to the Ballard neighborhood include expediating the subarea plan if Ballard is designated as a regional center and include the Ballard Alliance in this process. Preserve existing density along Market Street retail core, perform a cumulative transportation analysis, adjust the housing to jobs ratio for the Ballard Regional Center, more public safety, and increased green space investment.	Request for additional transportation analysis: The Final EIS incorporates roadway capacity changes proposed in the Seattle Transportation Plan considering cumulative growth assumed under Alternative 1 and the Preferred Alternative. See **Section 3.10 Transportation**. Detailed evaluation of specific multimodal improvements would be conducted by SDOT through project development.
25	**Lazerwitz**	**Roosevelt Neighborhood Association**
25-1	A series of questions about the implications of the Comp. Plan to the Roosevelt Neighborhood, impact of HB 1110 on current single-family zoning, definition of a	Comment noted and will be forwarded to decision makers. Provisions of HB 1110 and their consideration in Seattle are explained in a Seattle Fact Sheet.[99]

[99] See: https://www.seattle.gov/documents/departments/opcd/seattleplan/implementinghb1110.pdf.

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	major transit stop, and historic preservation designation.	
26	**Gurkewitz, Williams**	**Thornton Creek Alliance**
26-1	While the Plan and the SEPA Draft EIS evaluating the Plan are comprehensive, they fall short in several areas. Attached are our comments to help improve the Plan and Draft EIS and address those areas that require additional attention.	Please see responses to comments below.
26-2	Analyses of indirect and cumulative impacts are missing throughout the document. As a result, impacts are either underestimated or not identified making it impossible to fully compare alternatives.	The non-project EIS provides analysis at a cumulative citywide scale as well as by area and by the 130th/145th Station Area. As noted in WAC 197-11-442 (and Final EIS page 2-16) the analysis of plans and policies is broader and less detailed than for project proposals. Additionally the EIS identifies the cumulative effects in the context of the region (e.g., air quality/GHG, transportation model) or with multiple impact sources (e.g., noise). The EIS covers direct and indirect impacts. WAC 197-11-060 (4)(d) indicates that: "Impacts include those effects resulting from growth caused by a proposal, as well as the likelihood that the present proposal will serve as a precedent for future actions. For example, adoption of a zoning ordinance will encourage or tend to cause particular types of projects..." Each alternative would direct growth differently and offer different mixes of place types (similar to zoning) that would indirectly result in new land use patterns and need for infrastructure evaluated for example in Sections 3.6 Land Use Patterns & Urban Form, 3.10 Transportation, 3.11 Public Services, 3.11 Public Services, and 3.12 Utilities.
26-3	A concern there are missing mitigation measures. Do not believe that mitigation by development regulation alone is adequate protection in most instances. We have concerns, for instance, about the effectiveness of allowing developers to pay into City funds for affordable housing and replacing tree canopy, as opposed to requiring them to actually include affordable housing in multifamily buildings, or to retain mature trees on lots and plan around them.	See WAC 197-11-158 and WAC 197-11-330 (1)(c) which reference a lead agency should consider regulations: "Consider mitigation measures which an agency or the applicant will implement as part of the proposal, *including any mitigation measures required by development regulations, comprehensive plans, or other existing environmental rules or laws*." (italics added) The City will be required to show effectiveness in its housing approaches through: annual reports to the King County Affordable Housing Committee (Countywide Planning Policies) and five-year reports to the Department of Commerce (RCW 36.70A.130(9)) The Proposed Plan includes draft policies to monitor effectiveness of housing (H 2.2) and tree canopy plans and actions (CE 12.5).
26-4	Regionally set growth targets include 80,000 homes and 158,000 jobs over the next 20 years. Why	All alternatives test job growth consistent with regional targets in VISION 2050 and King County Countywide Planning Policies. The key changes in GMA laws and Countywide Planning Policies over

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	does the Draft EIS evaluate alternatives with greater housing needs of 100,000 and 120,000 while employment projections remain the same? Need citation and explanation.	the last several years were to increase housing supply and affordability. Thus the alternatives vary housing growth levels: The alternatives are responding to VISION 2050 MPP-RGS-7 that suggests greater housing in Metropolitan Cities like Seattle. As **Exhibit 3.7-8** describes, "The action alternatives increase housing growth above minimum growth targets to better balance jobs and housing and to provide for middle housing as well as focus growth around high-capacity transit, especially Alternatives 4 and 5. This is consistent with MPP-RGS-7 that suggests greater housing in Metropolitan Cities like Seattle and MPP-RGS-12 that shows a priority of growth around high-capacity transit." Additionally, the EIS scoping report in **Appendix A** explains the differences in growth as relating to maintaining 80,000 new growth principally in existing designated centers, and then considering alternative allocations "encouraging housing choice in all neighborhoods while focusing additional growth in areas with low displacement risk."
26-5	Where does the assumption that 15% of new jobs would be shifted to the location of new housing come from?	EIS **Exhibit 1.1-1** notes that 15% of new jobs would be shifted based on the location of new housing under Alternatives 2-5. The distribution of housing varies by neighborhood centers, Neighborhood Residential zones, corridors, and all types of nodes and corridors 15% represents the portion of jobs added between 2010 and 2020 that were in the following sectors: food and beverage stores; health and personal care stores; gasoline stations; clothing stores; sporting goods, hobby, book, and music stores; general merchandise stores; miscellaneous store retailers; non-store retailers; real estate; rental and leasing services; and food service and drinking places. These sectors represent businesses that tend to locate based on residential patterns as compared to office buildings.
26-6	The Draft EIS assumes that replacing the existing canopy of older trees (particularly evergreens) with younger trees is equivalent. This is not true. The loss of function from tree removal and replacement has not been evaluated in the Draft EIS. Impacts from mature tree removal are underestimated. Loss of function from removal of mature trees would take decades to replace when planting seedlings or saplings to replace them.	The analyses in the EIS have been expanded to address the potential for temporal loss (i.e., time lag between the loss of functions provided by removed trees and the replacement those functions by planted trees) of the essential benefits provided by tree canopy cover.
26-7	While the Draft EIS cites numerous federal regulations, it is unclear how it will comply with them. ▪ Clean Water Act – How does the current City's Stormwater Municipal Permit address future development? Will discharge	The federal regulations identified in the EIS apply to individual projects, not to planning-level documents such as the One Seattle Plan.

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	limits as well as flow control need to be modified to accommodate growth? ▪ Endangered Species Act – How will increased flow and pollutant load to surface water bodies from new development impact threatened and endangered aquatic species and their habitat? ▪ Migratory Bird Treaty Act and Bald and Golden Eagle Protection Act – How will the destruction of large trees, habitat for migratory birds - as part of proposed new development - impact birds protected under this act? How will trees and other wildlife habitat be protected for eagles and their prey species?	
26-8	Regulation as mitigation is inadequate. In the case of tree protection, often required mitigation measures for tree retention are ignored during planning – and permits are issued that allow removal of heritage trees. Limited enforcement currently. Unclear if with the proposed comp plan changes, the City be able to use SEPA authority.	See response to Comment 26-3 regarding use of regulations as mitigation including tree canopy regulations and ongoing monitoring. The City anticipates applying an infill exemption to residential uses per RCW 43.21c.229, but regulations will continue to apply.
26-9	The growth concept presented in the Draft Plan and evaluated in the Draft EIS prioritizes the built environment (housing, jobs, transportation) over the natural environment. Integrating best available science to protect critical areas (ECAs) does not prevent tree loss outside of ECAs. The highest tree loss across Seattle, as reported in the City's 2021 Canopy Assessment, occurred in parks, natural areas, and Neighborhood Residential areas.	The City is required to consider best available science in critical area regulations, as well as to offer housing affordable at all income levels per GMA. The City needs to address both natural and built environment quality. The City has an urban forest management plan and a goal of 30% tree canopy, and the City intends to monitor its plan and action in the Proposed Plan (Policy CE 12.3).
26-10	Concerns and missing analysis to the earth and water quality.	▪ "It is unclear how this applies to Seattle because there are relatively few undeveloped areas outside of the City." It is assumed the comment is referring to the following text passage: "As outlined in Vision 2050 (PSRC, 2020), focusing growth in ***previously developed urban areas*** [emphasis added] will result in less impact on ***regional*** [emphasis added] earth and

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		water resources than focusing the same growth in ***previously undeveloped areas outside of cities*** [emphasis added] that add new impervious surfaces controlled under current standards." The passage in **Section 3.1.2** refers to undeveloped areas in our region. The passages further qualifies that the undeveloped areas referred to are generally those located outside of all cities. The passage is not referring to the specific land immediately outside of and adjacent to the City of Seattle boundary, as that land is also located in previously developed urban areas that include the incorporated cities of Shoreline, Lake Forest Park, Burien, Tukwila, and Renton. ▪ "Missing is an analysis of cumulative impacts from 20 years of growth on earth and water resources from the development of regional cities along with Seattle." Such an analysis is outside of the scope of this impact evaluation which is citywide and focused on the City's land use plans and regulations and reviewing changes from current conditions to a future 20-year period of 2044. VISION 2050 provides a four county growth strategy, and supersedes VISION 2040. These plans were evaluated with an EIS and considered growth patterns that were more compact versus less compact and effects on the natural environment. ▪ "Section 1.6.1... water quality... must be evaluated for impacts regarding temperature, dissolved oxygen, sedimentation, bacterial loading (including fecal coliform), nutrients, and other factors that typically affect urban waters and human contact criteria therein." The metrics (construction, vehicle use, increased hard surfaces, and development proximity to water resources) presented in **Section 1.6.1** and later in **Section 3.1 Earth & Water Quality** are all sources and indicators of impacts from pollutants and temperature increases specific to the planned actions. ▪ The Comprehensive Plan Policies do not intend to maintain the status quo, but rather mitigate against the impacts identified as specific to the proposed actions. ▪ "Additional stormwater management in areas of the City that are already developed" is recommended in **Section 3.1.3** Other Potential Mitigation Measures: Install updated stormwater controls on roadways, which are not likely to be upgraded as part of the parcel redevelopments included in the alternatives. Roadway retrofitting has been found to be the most immediate action to improving water quality in urban areas. ▪ The City will continue to comply with the requirements of the latest version of the Municipal Stormwater Permit. The City has determined that changes to the *Stormwater Code and Manual* are not necessary in response to the impacts identified in this analysis. ▪ Please see **Section 3.3 Plants & Animals** for discussion of tree canopy.
26-11	Comments regarding Air Quality & GHG evaluation.	As discussed in **Section 3.2** (page 3.2-22), air quality and GHG modeling assumes the build out of each alterative in the year 2044. It is standard practice to assume the emission factors from build out year in this analysis to provide a reasonable estimate of

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		future emissions resulting from build out of the Plan. The MOVES model covers a 31-year range of vehicle ages (MOVES4 Technical Guidance, 2023). It is assumed that current trends in fuel economy improvements governed by standards established by the National Highway Traffic and Safety Administration (NHTSA) would continue. In addition to continued improvements in fuel economy, Washington State requires that 100 percent of sales of passenger cars, light-duty trucks, and medium-duty vehicles be zero emission (i.e., electric) by the year 2035. Further, as discussed, increased density and access to transit would result in shorter trip lengths, lowering VMT (WSDOT 2013). All of these factors combined, it is not speculative to assume that increases in VMT would be outweighed by future fuel economy and fleet mix as NHTSA continues to regulate fuel economy and annual increases in zero emission vehicles increase. Cumulative/Indirect Impacts: Please see response to Comment 26-2. The Air quality & GHG analysis is cumulative and called out that way. Regarding heat islands it is discussed in Final EIS **Section 3.3, 3.4, 3.6, 3.11,** and **3.12**, and mapped on **Exhibit 3.11-52**. **Section 3.2** includes discussion of residential strategies to reduce the potential level of air toxics. Included in the discussion is the incorporation of denser tree canopy. See also **Section 4.2.1.2 Tree Canopy Evaluation**. Regarding improved air filtration, Final EIS **Section 3.2** (page 3.2-50) includes discussion of enhanced air filtering and circulation systems that can be integrated into HVAC systems and ventilation systems.
26-12	Set of questions and additions to improve Plants and Animals section 3.3.	Threshold of significance: See response to Comment 20-6a. Impacts on individual species: See response to Comment 20-6b. Requests for more detailed analysis: Analyses in the EIS are consistent with SEPA requirements for programmatic, non-project reviews, per WAC 197-11-442. ESA-listed species: Comment noted. This comment is beyond the scope of environmental review of the One Seattle Plan so no response is necessary. Also see response to Comment 20-6b.
26-13	Use same methodology as Seattle Maritime Lands Final EIS for Plants & Animals.	Analyses in the EIS are consistent with SEPA requirements for programmatic, non-project reviews, per WAC 197-11-442.
26-14	How is threshold for tree canopy cover loss measured? What about large versus new trees addressed?	See Response to Comment Theme #2 from Letter 95, **Section 4.2.1.2 Tree Canopy Evaluation**. Also see response to Comment 26-6.
26-15	Plants and Animals section is inconsistent with City SEPA policy SMC 25.05.675 N Plants and Animals. How will mitigating measures in that policy be met?	The provisions in SMC 25.05.675 are for the purpose of reviewing project-specific proposals and potentially conditioning them if there are gaps in codes. See SMC 25.05.665(D). The Proposed Plan and associated development regulations are opportunities to amend policies and plans to reflect current conditions and needs.

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26-16	Missing information on urban wildlife corridors such as riparian corridors like Thornton Creek. There are also parks and ravines. Show on Figure 3.3.-2. Evaluate analysis of degraded water on urban wildlife.	The EIS has been revised to include discussions of urban corridors and the impacts of degraded water quality on wildlife. See **Section 3.3 Plants & Animals** of this Final EIS.
26-17	Focus on plants and animals impacts in Seattle, not region or state. Address loss of tree canopy cover in relation to impervious area standards, and temporal loss.	Analyses in the EIS evaluate impacts on plants and animals in Seattle while also placing those impacts in a regional context. Analyses relating to impervious areas standards are addressed in Section 3.1, Geology and Water Quality. The analyses in the EIS have been expanded to address the potential for temporal loss (i.e., time lag between the loss of functions provided by removed trees and the replacement those functions by planted trees) of the essential benefits provided by tree canopy cover.
27	**McAleer 1**	**Laurelhurst Community Club Council**
27-1	Review of draft Growth Strategy policies; concern about building heights, and concerns around changing parklands to housing.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
27-2	Comments regarding Draft One Seattle Growth Strategy. Concern about aging in place with taxes. Ability of City to provide adequate infrastructure. Avoid piecemeal projects with exceptions. Aurora Avenue and other areas as an urban center. Limit height in neighborhood centers less than 5-6 stories. Do not change parks to housing.	**Aging in place:** Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. The action alternatives evaluate different growth levels and place types meant to increase supply and housing that is affordable to allow for greater options for a range of lifestyles. The King County Assessor offers senior or disabled exemptions and deferrals. **Infrastructure:** The One Seattle Plan provides a Capital Facilities Element and Utilities Element. The City also creates a Capital Improvement Program based on long range utility system plans. See Final EIS Sections 3.10 to 3.12 regarding transportation, public services, and utilities meant to identify current and expected demand for infrastructure. **Avoid exceptions:** Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. The City must provide avenues for rezones, appeals, etc. per state planning laws. (RCW 36.70 and 36.70c) **Aurora Avenue as Center:** Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.

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		Neighborhood Centers and Height: The potential for impacts due to changes in urban form are addressed in EIS **Section 3.6**. **Do not change parks to housing:** Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
27-3	Series of questions and edits to land use around urban design, built environment, off street parking, commercial zones, industrial zones, and historic preservation and cultural resources. ▪ The infrastructure in the City was not built for all densities (e.g., width of streets, sewer). ▪ How will projects be considered "high quality" if SEPA and Design Review are not part of the regulatory process? ▪ Support protecting the public view corridors. ▪ Preserve historic and cultural resources. ▪ Promote daylighting streams. ▪ Regulations for abandoned landfills.	**Infrastructure:** See sections on **Transportation**, **Public Services**, and **Utilities** for analysis on planning for adequate infrastructure. **Review Processes:** City standards for zoning, design, utilities and more would apply to new development even where extra review is not part of the process. See **Appendix C** regarding infill exemptions. **Public View Corridors:** Public view corridors and views of designated Seattle Landmarks and other natural and human-made features are protected under City code; see EIS **Section 3.6 Land Use Patterns & Urban Form**. Public view corridors are protected under current Seattle zoning, shoreline, and environmental regulations and will continue to be protected. These are mapped and overlaid with the land use alternatives in **Exhibit 3.6-83, Exhibit 3.6-92, Exhibit 3.6-107, Exhibit 3.6-109**, and **Exhibit 3.6-113**. **Preserve Cultural Resources:** Comment noted. This comment is beyond the scope of environmental review of the One Seattle Plan so no response is necessary. regarding Laurelhurst Community Club's comments on re-use, the City's Indigenous history, education and outreach, and the value of historic preservation for Seattle's livability. Many of the volunteers on the Landmarks board are experts in historic architecture with broad understanding and knowledge about the city's historic resources. The Department of the Interior's Standards are the guidelines used by the Seattle Landmark's Board for granting Certificates of Approval after they review designs for any changes to designated Landmarks or for new construction in historic districts. **Stream Restoration:** See SMC 25.09.200(5). This is listed in reference to infill development in **Appendix C**. **Abandoned Landfills:** See 25.09.220. This is listed in reference to infill development in **Appendix C**.
27-4	Series of concerns, suggested edits and questions on the Transportation element related to sidewalks, reallocation of street space, building a green transportation system, and funding.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. See also the Seattle Transportation Plan and its EIS regarding transportation options and priorities.
27-5	Series of concerns, suggested edits and questions about the Housing element related to equitable access	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision

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	to housing, housing security, quality, and homelessness.	makers. See also response to Comment 27-2 for related comments on aging in place, quality of development and application of standards.
27-6	Series of concerns, suggested edits and questions about the Climate and Environment element related to transportation, tree canopy, sea level rise and flooding,	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. In each section of the EIS climate and equity considerations were addressed. Reference to the City's existing climate mitigation and adaptation plans were also identified in appropriate topic areas. Regarding tree canopy see response to comments to Letter 26. For sea level rise and flooding, please see response to Comment 5-4.
27-7	Series of concerns, suggested edits and questions about the Arts and Culture element around place keeping, public art, and youth education.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
27-8	Series of concerns, suggested edits and questions about the Parks and Open Space element around equitable provision of public space, operations and maintenance, and partnering with communities. Concern about SEPA and noise from activities from abutting parks and residential uses.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. The comment addresses the Parks and Open Space Element of the Comprehensive Plan. The Final EIS addresses Parks and Open Space in **Section 3.11**. In response to Policy 1.19 to mitigate noise on public space, the commenter notes support but asks what SEPA process is used for pickleball courts that are noisy. Regarding noise and SEPA, see SMC Chapter 25.08 - Noise Control.
27-9	Series of concerns, suggested edits and questions about the Community Involvement element around engaging residents equitably, and Indigenous engagement.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
28	**McAleer 2**	**Laurelhurst Community Club Council**
28-1-8	Same as Letter 27.	Please see responses to Letter 27.
29	**McAleer 3**	**Laurelhurst Community Club Council**
29-1	Similar content to 27-2. Concerns on how to finance increased infrastructure needs and public amenities to match demand with increase in new residents.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
29-2	Similar content to 27-2. Supports more regional and urban centers proposed at Northgate and 130th	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes

Number	Comment Summary	Response
	and for future ones in West Seattle Junction and Rainier Valley. Suggest Aurora Ave be designated urban center with a Master Plan.	related to the One Seattle Plan will be forwarded to decision makers.
30	**McAleer 4**	**Laurelhurst Community Club Council**
30-1	List of Land Use policies that LCC supports, does not support, and has questions about. Topics include development standards, parking, and public facilities.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. See also Response to Comment 27-3.
31	**McAleer 5**	**Laurelhurst Community Club Council**
31-1	List of Land Use policies that LCC supports, does not support, and has questions about. Topics include tree canopy, urban design, and built environment	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. See also Response to Comment 27-3.
32	**McAleer 6**	**Laurelhurst Community Club Council**
32-1	List of Land Use policies that LCC supports, does not support, and has questions about. Topics include historic preservation and cultural resources and environmentally critical areas.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. See also response to Comment 27-3.
33	**McAleer 7**	**Laurelhurst Community Club Council**
33-1	Similar content as 27-4.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. See also the Seattle Transportation Plan and its EIS regarding transportation options and priorities.
34	**McAleer 8**	**Laurelhurst Community Club Council**
34-1	Similar content to 27-4 and 5 about the Transportation and Housing Elements.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. See also the Seattle Transportation Plan and its EIS regarding transportation options and priorities. See also response to Comment 27-2 for related comments on aging in place, quality of development and application of standards.
35	**McAleer 9**	**Laurelhurst Community Club Council**
35-1	Similar content to 27-5 about the Housing Element.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes

Number	Comment Summary	Response
		related to the One Seattle Plan will be forwarded to decision makers. See also response to Comment 27-2 for related comments on aging in place, quality of development and application of standards.
36	**McAleer 10**	**Laurelhurst Community Club Council**
36-1	Similar content to 27-5 and 6 about the Housing and Climate and Environment element.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. See also Responses to Comments 27-2 and 27-6.
37	**McAleer 11**	**Laurelhurst Community Club Council**
37-1	Similar content to 27-6 about the Climate and Environment element.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. See also Response to Comment 27-6.
38	**McAleer 12**	**Laurelhurst Community Club Council**
38-1	Similar content to 27-7 regarding Arts and Culture.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
39	**McAleer 13**	**Laurelhurst Community Club Council**
39-1	Similar content to 27-8 about the Parks and Open Space element.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. See Response to Comment 27-8.
40	**McAleer 14**	**Laurelhurst Community Club Council**
40-1	Similar content to 27-9 about the Community Involvement Element.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
41	**McAleer 15**	**Laurelhurst Community Club Council**
41-1	Similar content to 27-2 about Growth Strategy.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
42	**McAleer 16**	**Laurelhurst Community Club Council**
42-1	Similar content to 27-3 regarding Land Use.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes

Number	Comment Summary	Response
		related to the One Seattle Plan will be forwarded to decision makers.
43	**McAleer 17**	**Laurelhurst Community Club Council**
43-1	Similar content to 27-3 about Growth Strategy.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
44	**McAleer 18**	**Laurelhurst Community Club Council**
44-1	Where is the definition of affordability that is used in the Draft EIS? If the Plan says it implements HB 1011, and the definition of affordability in HB 1011 is clearly stated at less than 60% of AMI for renters and less than 80% of AMI for owner-occupied, why isn't this statewide definition in the Plan?	See **page 3.8-15**, which identifies housing costs; less than 30% of their gross income for housing is affordable. The percent of area median income is based on the 2022 HUD Median Family Income on Final EIS **page 3.8-12**. The state definitions of affordability used to allocate targets are found in the Growth Management Act (per HB 1220) in RCW 36.70A.030 and 070: moderate (at or below 120 percent AMI), low (at or below 80 percent AMI), very low (at or below 50 percent AMI), and extremely low-income (at or below 30 percent AMI) households. HB 1110 refers to GMA definitions.
44-2	In the Draft EIS Executive Summary, the objective for affordability is: "Increase the supply of housing to ease increasing housing prices cause by limited supply and create more opportunities for income restricted housing." Where is the evidence that this dependence on supply-side, trickle-down housing works? Do you agree that given the state definition of affordability in HB 1110, that no new for-profit housing will be affordable without subsidies? Where does the Draft EIS acknowledge this? Do you agree that given the state definition of affordability in HB 1110, no new market-rate townhouses are affordable to households with incomes less than 80% of AMI, without subsidies and income restrictions? Can duplexes, triplexes, fourplexes, sixplexes, stacked flats and courtyard apartments be developed in Urban Residential	See **Section 4.2.1.1** regarding the affordable housing evaluation. Final EIS **Section 3.8.2** also includes an analysis of projected affordable units by alternatives, including the affordability of new market housing supply (**page 3.8-45**) as well as estimated production of new affordable units through MHA and MFTE (**Exhibit 3.8-43, Exhibit 3.8-44, Exhibit 3.8-45,** and **Exhibit 3.8-49**). As discussed on **page 3.8-45**, market rate housing price escalation is caused by competition for a limited supply of homes. By allowing for increased housing production, the City can increase the housing supply and reduce the competition for available units. This is expected to reduce upward pressure on market rate housing rents and housing prices.[100] HB 1110 provides a definition of "affordable housing" for the purpose of setting income limits for income-restricted housing units required for an increased density allowance enabled by that legislation. The term "affordable" refers to housing that costs less than 30% of the occupant's household income. This definition is in the Final EIS. It is likely that new market-rate townhomes would not be affordable to households with incomes below 80% AMI. The EIS draws on recent development trends in similar zones to develop assumptions about the most likely types of new housing development by zone under each alternative. The results are shown in **Exhibit 3.8-41.** With regards to incentives in Neighborhood Residential zones, under HB 1110, Seattle must allow up to 6 units per lot (i.e., 2 bonus units) if at least 2 are affordable. The proposed Neighborhood Residential zones would

[100] See the MHA Final EIS Appendix I Housing Production and Cost: A Review of the Research Literatures available in an online archive: AppI_MHA_FEIS_2017.pdf.

Number	Comment Summary	Response
	areas given lack of economies of scale?	also allow additional height (up to 4 stories), floor area (FAR of 1.8), and density (up to 1 unit per 400 square feet of lot area) on sites within a quarter-mile of frequent transit where at least half the units are affordable to further incentivize affordable housing. City analysis projects 8-10% of Neighborhood Residential-zoned lots are potentially redevelopable with middle housing over the next 20 years. For-profit and non-profit developers have built middle housing types, especially townhouse-style duplexes, triplexes, and other multiplexes in Seattle and nearby cities. Middle housing is primarily intended to supply home ownership opportunities, though both rental and ownership types have been built. See **Exhibit 3.6-100 through Exhibit 3.6-105** for illustrations of potential Neighborhood Residential block redevelopment over the next 20 years.
44-3	What is the environmental impact of continuing to lose 1.7% of our tree canopy every five years, when 70% of our tree canopy and most of the loss is in formerly single-family neighborhoods? Where does the Plan acknowledge that planting new trees takes 20-30 years to provide tree canopy, to shade houses, or to combat heat islands?	The source of the estimated rate of future tree canopy loss is not clear. If that estimate was derived from the 2022 City of Seattle Tree Canopy Assessment, please note that the City updated its regulations after that study was completed, implementing stronger requirements for tree retention and tree replacement. See also **Section 4.2.1.2** regarding tree canopy. Analyses in the EIS have been expanded to address the potential for temporal loss (i.e., time lag between the loss of functions provided by removed trees and the replacement those functions by planted trees) of the essential benefits provided by tree canopy cover.
44-4	Where does the Plan acknowledge that supply-side trickle-down housing takes 30-40 years to age into natural affordability?	Comment noted. Comments on the plan are outside the scope of the environmental analysis for the One Seattle Plan and alternatives, so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. See also Response to Comment 44-2.
44-5	Specifically, how many low-income affordable rentals will be built under Alternative 5? Will this be half of all new housing units, as called for by the Governor and the Department of Commerce? If not, what zoning and policies could mitigate the extreme lack of affordable rentals in Seattle?	The EIS evaluates Alternative 5 and the Preferred Alternative as adding 120,000 dwelling units. The City's Housing Element is meant to address housing targets in the Countywide Planning Policies. The targets are based on a state and regional method recognizing housing needs across all income levels. Projected housing types and affordability are considered relative to adopted housing targets by income level for each alternative.
44-6	Several years ago, the City redefined "family-sized housing" as 2 bedrooms, rather than 3 bedrooms. How has that change contributed to the lack of family-sized rental housing being built, and what would be the effect of restoring the definition of family size to the common understanding of 3 bedrooms?	Seattle does not regulate the number of bedrooms in new housing development through zoning, with the exception of family-sized unit requirements in LR1 zones. These requirements are not proposed to change under the action alternatives. However, incentives such as MFTE and MHA do reference number of bedrooms when setting affordability requirements. These requirements are also not proposed to change under the action alternatives. This EIS does not analyze the impacts of past City actions with regards to family-sized housing definition, or potential impacts of future actions not related to the action alternatives.

Number	Comment Summary	Response
44-7	What zoning tools are available, including MHA, to require more family-sized 3-bedroom rental housing at all income levels?	See also Response to Comment 44-6.
44-8	Where does the housing plan acknowledge the needs of seniors and people with disabilities for accessible housing without stairs?	Comment noted. Suggestions for policy changes or on plan elements are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. Under the Preferred Alternative's proposed Neighborhood Residential zoning, stacked flats will have a floor area ratio (FAR) bonus and density bonus—beyond other middle housing types—when located on lots at least 6,000 square feet within ¼ mile of transit (see "Stacked flat bonus" on Updating Seattle's Neighborhood Residential zoning's page 8). Stacked flats are housing units where the entire living space of an individual unit is contained on one floor and stacked on top of other units. Although such buildings will still include stairs to reach the upper story units, the ground floors can be ADA-accessible, and the upper story units can accommodate less stair use than a townhouse or a multistory single-family house. Additionally, the City could explore updating the elevator regulations in the Seattle building code to significantly reduce the cost of elevators. Such changes would make it more viable for developers to add elevators to small projects—increasing their accessibility—that are three to four stories tall, instead of such projects being walk-up buildings. The City continues to partner with land trusts and non-profit housing developers to encourage desired development.
44-9	What is the effect of lacking 11,000 blocks of sidewalks on our vision of a 15-minute city?	**Exhibit 3.10-12** and **Exhibit 3.10-13** in the Final EIS show existing pedestrian facilities and sidewalk connectivity, including the lack of sidewalks north of North 85th Street as noted by the commenter. See the Active Transportation subsection in Impacts Common to All Alternatives in **Section 3.10.2**. **Exhibit 3.10-32** and **Exhibit 3.10-33** in the Final EIS summarize the population and employment within low, medium, and high sidewalk connectivity census tracts for each alternative as well as existing conditions. A more detailed inventory of sidewalks and their condition may be found in the Pedestrian Element of the Seattle Transportation Plan, along with prioritization criteria that will guide the City's investments in pedestrian infrastructure.
44-10	Master plans are needed to be certain that all income levels and abilities are met and a master fund portion goes to sidewalks and amenities for all types of priced housing.	Comment noted. Suggestions for policy changes or on plan elements are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.

4.2.2.4 Property Specific

Exhibit 4.2-4. Written Comments and Responses, 2024—Property Specific

Number	Comment Summary	Response
45	**Aggerholm**	**Grousemont Associates, QA Canal LLC**
45-1	Support any additional density in area just off the Ballard Bridge between SU to make development more achievable. Own several properties including on 13th Avenue West.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
46	**Baumgartner**	
46-1	Request NC2-55 zoning for church owned property at 133rd and 1st Ave NE (Lots 3, 4, and 5 of block 65, in the H.E. Orr Park Division No. 6) so the church can redevelop as mixed use with possible supportive housing.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
47a	**Boyd**	**Bellwether Housing 1**
47a-1	Bellwether Housing owns and operates the Kingway Apartments, an existing affordable housing community located at 5952 Martin Luther King, Jr. Way S. Property is within walking distance of a future light rail station but is currently split zoned Midrise and NC-2 with a 55' height limits. Encourage OPCD to consider heights and densities commensurate with NC zoning on the entire site, with height limits up to 125'. Also encourage the City to look at similar sites citywide as part of Comprehensive Plan implementation to ensure they are not split zoned.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
47b	**Boyd**	**Bellwether Housing 2**
47b-1	Bellwether Housing is working with North Seattle College to develop the underutilized southwest corner of campus as affordable housing. Request the City study an expansion of the Northgate Regional Center and include the area underlying the North Seattle College MIMP into the One Seattle Preferred Action.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.

Number	Comment Summary	Response
48	**Clawson**	**West Roy LLC**
48-1	Support Alternative 5. West Roy LLC owns property at 14 West Roy in the Uptown neighborhood, currently used for warehousing and retail purposes. Request the Final EIS study expansion of the Uptown Urban Center further to the north and an increase in minimum urban center height limits generally from 85 and 125 feet.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
49	**Clawson**	**Nicola Wealth**
49-1	Support Alternative 5. Nicola Wealth owns property at 155 NE 100th Street and 9725 3rd Avenue NE. Request the Final EIS and Northgate Regional Center Subarea Plan study 240 feet in height feet in height on the property as it is a key opportunity to maximize housing unit delivery.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
50	**Clawson**	**Alteutian Spray Fisheries**
50-1	Aleutian Spray Fisheries owns property at 2157 N Northlake Way zoned Urban Industrial with a height limit of 45' (Industrial and Maritime Strategy allow a limited amount of workforce residential development in the zone). Aleutian feels strongly that more workforce housing is needed in Seattle. Request the Final EIS study a height limit of 65' for residential uses in the UI/U-45 zone on Aleutian's sloped property between Waterway 19 and the Sunnyside Avenue N Boat Ramp.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
51	**Clawson**	**Lee Johnson**
51-1	Support Alternative 5. Lee Johnson owns several properties in Northeast Seattle, generally in Roosevelt, Lake City, and north of Wedgewood. Request the Final EIS: ▪ Protect Lake City Way as a commercial corridor, study C1-75 zoning for all mentioned properties. ▪ Study more housing in Downtown with more	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.

Number	Comment Summary	Response
	commercial uses/jobs in the neighborhoods (to support job/housing balance). ▪ Analyze growth directed towards commercial corridors outside centers and villages (e.g., Lake City, 15th Avenue NE, and Roosevelt). ▪ Consider rezoning much larger and deeper swaths along corridors to commercial zones to eliminate the awkward and sometimes impactful transitions that occur when C zones and NR zones directly abut each other and to support more commercial development. ▪ Ensure the City utilizes its own general rezoning principles stated in SMC Chapter 23.34, which state that generally physical buffers (such as streets and sometimes alleys) should serve as the zone boundary transition. ▪ Eliminate split zoned conditions as part of implementation.	
51-2	Connected Communities concept should focus on job creation in places where people already live (like NE Seattle), to reduce commute times and reduce greenhouse gas emissions. Consider adding more jobs/commercial zoning to the corridor areas (including listed properties and add a Growth Strategy that discusses commercial uses and commercial zones. Consider the creation of a new neighborhood center along the Lake City Way corridor between the Lake City Urban Center and the Roosevelt Urban Center. Specific edits to Policy LU 1.3.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
52	**Clawson**	**70th & Greenwood Ave LLC 1**
52-1	Email directing attention to Letter 53.	See Response to Comment 53.
53	**Clawson**	**70th & Greenwood Ave LLC 2**
53-1	70th & Greenwood Ave LLC owns four contiguous parcels at 7010	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and

Number	Comment Summary	Response
	Palatine Avenue North and 7009 Greenwood Avenue North in Phinney Ridge. Support for Phinney Ridge's continued evolution as a complete and walkable neighborhood. Support the continued inclusion of Policies GS 5.1 in future versions of the Plan Update and EIS. Request the parcels be included within a Phinney Ridge Neighborhood Center similar to that depicted in the image from page 20 of the Draft Plan Update.	alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
54	**Cramer**	**Individual**
54-1	Request to upzone 4709 9th Avenue NE (APN 0889000030) from LR1 to MR. Request to consider similar upzones and redesignation for surrounding neighborhood as it is just outside the University District Regional Center (or possibly inclusion in the center boundary).	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required.
	Daniel	**Haller Lake United Methodist Church**
	See Letter 174.	See Letter 174.
55	**Dunn**	**Dunn & Hobbes, LLC**
55-1	Support for Alternative 5. Owner/partner of four sites currently zoned NC-5 in the Central District neighborhood. Request to study additional height and density and revised setback requirements on small/shallow parcels zoned NC-55 to encourage development and create a workable MHA program. Suggested ideas for NC-55 sites that could be selectively applied to sites that directly abut residential zones and are less than 120 feet deep or 10,000 SF total (increase FAR so full 5th story is possible, reduce/eliminate frequency of NC-zoned sites abutting Neighborhood Residential zones, elimination of upper-level setbacks when NC/NR transitions do occur to prioritize housing development).	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. See also **Section 4.2.1.3** regarding changes to zoning standards in centers.

Number	Comment Summary	Response
56	**Fiorito**	**Fiorito Family**
56-1	Owners of the properties that comprise nearly a full block bounded by NW 48th Street, NW 49th Street, 8th Ave NW, and 9th Ave NW in northeast Ballard. City removed the property from the BINMIC as part of the Industrial and Maritime Strategy but the block is still designated industrial on the FLUM. Request the Final EIS study this property and other isolated lands outside the BINIMC for the Ballard Regional Center designation with appropriate heights as adjacent to the 8th Ave NW frequent transit corridor.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
57	**Gunter 1**	**Alexandria Real Estate Equities, Inc**
57-1	Alexandria Real Estate Equities owns the Salvation Army property located at 1000 4th Ave S. The property is within the Greater Duwamish MIC and zoned II 85-240. Request to remove from the MIC and incorporate into the Downtown Regional Center. The II 85-240 zone is more akin to a Downtown zone and is/will be supported by light rail (existing Union Station and possible future "CID South").	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
58	**Gunter 2**	**Alexandria Real Estate Equities, Inc**
58-1-3	Same content as Letter 11.	See responses to Letter 11.
59	**Chhan and Enslow**	**Individual**
59-1	Own two properties in the First Hill/Capitol Hill Regional Center, both currently developed with single-family residences (one is currently used as an office). Support the Mayor's vision for the One Seattle growth strategy overall but encourage the City to evaluate additional height and density inside the First Hill/Capitol Hill Regional Center (specifically near Roy Street should zone for heights of 95', especially for mass timber buildings).	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.

Number	Comment Summary	Response
60	**Harel**	**Era Living**
60-1	Owner of the Ida Culver House in Ravenna. Support Ravenna's continued progress towards becoming a complete and walkable neighborhood and additional zoned capacity within the Ravenna neighborhood generally and specifically on both sides of the 65th Street commercial corridor. Encourage the City to include the Mayor's proposed Ravenna neighborhood center in the final Plan, and that property within 1,000 feet of the 25th Avenue NE and NE 65th Avenue intersection support 8-story densities to support further enhancements to vibrant, mixed-use walkable neighborhood. Request the Final EIS study impacts of resolving split-zoning within the neighborhood in favor of the higher density zoning, including the Ida Culver House property (rezoning the whole parcel to NC).	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. It should be noted that in 2025 OPCD anticipates proposing legislation that will address split zone lots throughout the city.
61	**Heglund**	**MRH Properties LLC**
61-1	MRH Properties owns two parcels at 1103-1109 N 36th St in the Fremont Hub Urban Village. Properties are not within nor bordering an MIC. Support for creation of the Fremont Urban Center and request rezone for neighborhood commercial use (instead of Industrial Commercial) consistent with Fremont Urban Center, Policy LU 13.11, and expected growth needs.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
62	**Keck**	**Schnitzer West**
62-1	Schnitzer West owns properties at 570 and 550 Mercer St in the Uptown Regional Center. Support for Alternative 5 but with heights of at least 125 feet for the properties to support residential development in this center-city neighborhood (and consistent with surrounding higher height limits).	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.

Number	Comment Summary	Response
63	**Kramer**	**Individual**
63-1	Own home at 8th Ave and 130th St. Did not support the nearby light rail station and does not support the proposed heights/densities near the station without clear mitigation strategies, particularly related to loss of tree canopy and parking from apartment buildings and those accessing light rail.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. See also **Section 4.2.1.2** regarding tree canopy.
64	**Lai 1**	**DCL Management LLC**
64-1	DCL UW owns property located at 4552 University Way NE, on the corner of 47th Street and "The Ave" in the heart of the U District. Support for Alternative 5. Request the Final EIS study mixed-use zoning (Seattel Mixed) of up to 240' along University Way NE at least north of NE 46th Street to encourage mixed-use redevelopment of the property and surrounding North Ave properties.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
65	**Lai 2**	**DCL UW LLC**
65-1	Same content as Letter 64.	See response to Comment 64.
66	**Lehmann, Gillespie, Soules, Liebman**	**Lander Street Owners**
66-1	Industrial property owners and business operators in the Greater Duwamish MIC that own over 25-acres around the expanded Lander Street light rail station (in the Industry and Innovation U/160 zone). Believe the Draft Plan should study policies to allow a "Lander Center" node TOD concept – potentially including residential (with workforce housing units), industrial, office, entertainment, hospitality, schools, hospitals, and training facilities – at the expanded Lander Street station (supported by Policies LU 13.3 and 13.27). Request the Final EIS study the "Lander Center" node or start a master planning process for the area. City should also evaluate the implementation of the II around light rail stations either as part of the "Lander Center" node concept	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. No rezone or master planning of this area is proposed at this time.

Number	Comment Summary	Response
	or as part of the implementation of the Draft Plan. Request the II zone support the opportunity for new hospital and educational opportunities near light rail.	
67	**Marasco**	**Security Properties**
67-1	Support the Draft Plan and its neighborhood center goals. Request to resolve conflicts with the City's Principal Pedestrian Street zoning and the goals outlined in the Plan and to study these changes in the Final EIS. Currently proposing a new mixed-use development in Wedgewood (in design review) and concerned restrictions in the existing zoning that have led the project to request five departures (especially related to the pedestrian zoning) will stymie the development process. Request the Final EIS study removal of Pedestrian-zone curb cut access restrictions so the project can move forward as of right.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
68	**Maxwell**	**Bayview Walker LLC/Prologis LP**
68-1	Support for Alternative 5. Bayview Walker currently owns vacant property at 2300 26th Ave S within the future North Rainier Urban Center (Request to rezone the property from Commercial 2 to Seattle Mixed to leverage the property's proximity to transit. Final EIS should study increased housing and jobs targets for the North Rainier Urban Center using the Seattle Mixed Zoning for our property and similarly situated properties north of S. Bayview Street within an approximate half-mile of light rail.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
69	**McCutcheon**	**IPB Properties Inc.**
69-1	IPB Properties owns the half-block located at 2700 1st Avenue in Belltown and is in the process of obtaining a MUP for mixed residential and retail redevelopment. Current zoning limits the height of the project to	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.

Number	Comment Summary	Response
	145' which provides very little development capacity above the height at which "highrise" code requirements are triggered. Request to adjust heights and densities for residential projects in Belltown upward consistent with the City's rezoning actions throughout the rest of Downtown—suggested revisions to increase maximum height to 280', increase allowable average tower floorplate to 14,000 square feet, eliminate maximum lot coverage requirements, and increase non-residential FAR to 6.	
70	**McCullough**	**Graham Street Realty**
70-1	Graham Street Realty owns "Interbay Worklofts" at 1631 15th Ave W. City took steps to support and promote makers spaces (like the Interbay Worklofts) in the UI zone—request a similar approach is warranted for certain properties in the II zone (e.g., adding a live-work component to the II zone for smaller-scale existing buildings).	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
71	**Morrison**	**McCullough Hill PLLC**
71-1	Coalition of property owners around Stone Way and N 35th Street within the current Fremont Hub Urban Village. Properties are not within nor bordering an MIC. Support for creation of the Fremont Urban Center and rezone for neighborhood commercial use (instead of Industrial Commercial) consistent with Fremont Urban Center, Policy LU 13.11, and expected growth needs.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
72	**Norman**	**Individual**
72-1	Owns 3509-3513 Stone Way N within the current Fremont Hub Urban Village. Same content as Letter 71.	See Response to Comment 71.

Number	Comment Summary	Response
73	**Rohlfing**	**Individual**
73-1	Co-owner of property at 1102 North 34th Street in Fremont. Same content as Letter 71.	See Response to Comment 71.
74	**Roos**	**Hillis Clark Martin & Peterson Law Offices**
74-1	Congregation Beth Shalom owns five parcels at 6800 35th Avenue NE and 6830-6842 35th Avenue NE in Wedgwood which fall within a Frequent Transit Service Area. Request the Final Plan's FLUM not proceed with the Draft Plan's proposed downzone of 35th Avenue NE to the urban neighborhood designation. For the Congregation's properties, the Congregation instead asks that that the FLUM use either the corridor designation or the neighborhood center designation as studied in the Draft EIS which better represent the current traits of the Congregation's properties and the clear existing trends of the neighborhood. Request the Final EIS consider possibility of NC1-40(M) zoning on Congregation's properties in the future to help enable prospective flexibility for the Congregation and City policymakers—Congregation is currently evaluating whether to request a rezone of its four NR-3 zoned properties into NC1-40(M) zoning, to better match the Congregation's long-term needs and better align with the development pattern of its northerly neighbors.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
75	**Selig**	**J. Selig Real Estate LLC**
75-1	JSRE owns two properties located on Market Street in Ballard and is in strong support of the proposed Ballard Regional Center designation. Encourage the City to study and adopt zoning at the 15th & Market intersection supporting densities of 320+ feet (like the U-District TOD zoning). The One Seattle Plan and Final EIS should	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.

Number	Comment Summary	Response
	study the potential for heights and densities of up to 240 feet around the walkshed of the future Ballard light rail station, including 1145 NW Market, and up to 160 feet west of 24th Avenue along Market near the Nordic Museum. Final EIS should also study increased housing and jobs targets for the Ballard Regional Center so the City can fully analyze the benefits of TOD zoning, and encourage the City to expedite all subarea planning (and make this new Ballard Regional Center one of the first subarea plans to be completed).	
76	**Snow**	**Snow & Company Inc**
76-1	Snow & Company operate a boat repair business at 469 NW Bowdoin Pl, currently in an Industrial Land Use Classification and zoned MML U/65. City's shoreline policies can conflict with the intended function of both the underlying zoning and shoreline environment, resulting in the creation of nonconforming uses and precluding new industrial uses from locating in the zoning and shoreline environments designated to accommodate them. Recommend expanding one Industrial Zone policy to ensure viability of those businesses which rely on the shoreline (LU 13.2).	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
77	**Tobar**	**CIM Group**
77-1	Own One Convention Place and the Pine Street Garage. Urge City to pursue innovative land use strategies to foster a welcoming environment for employers, visitors, and residents, including implementation of a Downtown sign overlay. Support for Policy LU 4.11 with suggested revisions.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
78	**Warner**	**Balboa Retail Partners**
78-1	Balboa Retail Partners and BRFII Northgate owns property located at 830 NE Northgate Way which is	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required.

Number	Comment Summary	Response
	currently zoned Neighborhood Commercial 3 with a height limit of 55'. Support for Alternative 5 but request the Final EIS and Northgate Urban Center Subarea Plan study at least 85' heights on our property to address housing affordability and optimize larger sites like ours by removing unnecessary height constraints.	
79	**Wood**	**SBPS LLC**
79-1	SBPS owns 126,000 square feet at Sand Point and Princeton fronting Sand Point way NE between 47th and 50th Ave NE. Encourage the City to include neighborhood centers as a preferred alternative in the Final EIS and include Sandpoint/Princeton as a neighborhood center in the Final EIS and Final Plan.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
80	**Worthington**	**Lock Vista Apartments LLC**
80-1	Lock Vista Apartments owns apartments 3025 NW Market St in the western edge of the future Ballard Regional Center. Support the Mayor's vision for One Seattle and policies that will facilitate greater residential density and commercial vitality in Ballard, including the Ballard Regional Center designation, and urge the City to complete the applicable subarea plan as quickly as possible. Request the Final EIS study impact of allowing greater residential density with buildings up to 125' in height along the westernmost Market Street corridor (supported by ST3's BLE Ballard station).	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
81	**Smith 1**	**Urban Visions**
81-1	Urban Visions owns the site known as the S development property at 1045 and 1022 6th Ave S. The property is within the Greater Duwamish MIC and zoned II 85-240. Request to remove from the MIC and incorporate into the Downtown Regional Center. The II 85-240 zone is more akin to a	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives, so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.

Number	Comment Summary	Response
	Downtown zone and is/will be supported by light rail (existing Union Station and possible future "CID South"). Current market conditions also indicated that office development may not be feasible in the area in the future but there is need for robust housing development (especially near regional transit).	
82	**Smith 2**	**Urban Visions**
82-1	Urban Visions is the development manager of properties at 318 5th Ave N and 516 Broad St in the Uptown neighborhood. Support for Alternative 5 but current zoning limits height of future development to 160' which does not support the kind of residential development that could be achieved in this center-city neighborhood. Request to adjust heights and densities in Uptown—suggested revisions to increase tower heights to 200' and podium heights to 85', increase the tower floorplate gross floor area to 75% of site are, and provide additional FAR.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.

4.2.2.5 Individuals

Individuals by Last Name (A – G)

Exhibit 4.2-5. Written Comments and Responses, 2024—Individuals (A – G)

Number	Comment Summary	Response
83	**Achanta**	
83-1	What is the Comp Plan's impact on Seattle's plants and animals?	See **Section 4.2.1.2** regarding response on impact to plants and animals.
83-2	Concern for lost urban forest. How will Seattle make progress toward its 30% tree canopy goal? How much public land is available?	See **Section 4.2.1.2** regarding response on impacts to tree canopy coverage and 30% tree canopy goal.
84	**Akalaitis 1**	
84-1	Concern for tree canopy. Where Seattle has planned for planting and maintenance of new trees. Is there a map and plan?	See the description of the City's recently amended tree code at the footnote[101], including a list of other tree canopy programs, and the City's urban forest management plan[102].
85	**Akalaitis 2**	
85-1	Concern for tree canopy. How will Seattle plant enough trees to make up for development? How is this measured and monitored?	See **Section 4.2.1.2** for Response to Letter 83 and Response to Letter 500 regarding the City's Tree Protection Ordinance.
86	**Alexander**	
86-1	Concern for housing increase, and lack of recognition to existing Covenants that says you cannot build a structure to impede views of Puget Sound in Sea-Lawn Acres Add of Broadview.	The City is not responsible for enforcing or mapping preexisting private covenants, easements, or deed restriction; however, the City is aware that some preexisting private covenants, easements, CC&Rs, and other deed restrictions may prevent developing to the maximum density allowed by proposed zoning controls even if not included in the various maps, Comprehensive Plan, or development regulations.
87	**Alfieri**	
87-1	Similar language to Letter 83, impact on plants and animals.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants and animals.
87-2	Similar language as Letter 83 about tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding tree canopy.
88	**Alspach**	
88-1	Support for Alternative 5. Study impacts of additional	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and

[101] See: https://buildingconnections.seattle.gov/2023/07/27/new-tree-protection-ordinance-goes-into-effect-on-july-30/#.
[102] See: https://www.seattle.gov/documents/Departments/UrbanForestryCommission/2021/2021docs/UrbanForestManagementPlanFinal.pdf.

Number	Comment Summary	Response
	neighborhood centers off of arterials, especially Green Lake neighborhood.	alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. The Preferred Alternative includes 30 neighborhood centers. See also **Section 4.2.1.3**.
89	**Amadon 1**	
89-1	Portion of Letter 92. Included sets of questions 1-6 including affordability, housing supply, middle housing rental supply, environmental impact of tree canopy loss. Same content as Letter 44.	See Responses to Comments 44-1 and 44-2 (also Comments 92-1 through 92-6 below).
90	**Amadon 2**	
90-1	Portion of Letter 92. Included sets of questions 7-14 including affordability, housing supply, middle housing rental supply, environmental impact of tree canopy loss. Same content as Letter 44.	See Responses to Comments 44-2 through 44-8 (also Comments 92-7 through 92-14 below).
91	**Amadon 3**	
91-1	Portion of Letter 92. Included sets of questions 15-19 including affordability, housing supply, middle housing rental supply, environmental impact of tree canopy loss. Same content as Letter 44.	See Responses to Comments 92-15 through 92-19 below and Letter 44-9 (also Comments 92-18 below).
92	**Amadon 4**	
92-1	Where is the definition of affordability that is used in the Draft EIS?	See Response to Comment 44-1.
92-2	If the Plan says it implements HB 1011, and the definition of affordability in HB 1011 is clearly stated at less than 60% of AMI for renters and less than 80% of AMI for owner-occupied, why isn't this statewide definition in the Plan?	See Response to Comment 44-1.
92-3	In the Draft EIS Executive Summary, the objective for affordability is: "Increase the supply of housing to ease increasing housing prices cause by limited supply and create more opportunities for income restricted housing." Where is the evidence	See Response to Comment 44-2.

Number	Comment Summary	Response
	that this dependence on supply-side, trickle-down housing works?	
92-4	If you exclude fanciful supply-side housing promises, what is the likelihood that this plan will result in affordable low-income housing provided by the market?	See Response to Comment 44-2.
92-5	Do you agree that given the state definition of affordability in HB 1110, that no new for-profit housing will be affordable without subsidies? Where does the Draft EIS acknowledge this?	See Response to Comment 44-2.
92-6	Do you agree that given the state definition of affordability in HB 1110, no new market-rate townhouses are affordable to households with incomes less than 80% of AMI, without subsidies and income restrictions?	See Response to Comment 44-2.
92-7	Can duplexes, triplexes, fourplexes, sixplexes, stacked flats and courtyard apartments be developed in Urban Residential areas given lack of economies of scale?	See Response to Comment 44-2.
92-8	What is the environmental impact of continuing to lose 1.7% of our tree canopy every five years, when 70% of our tree canopy and most of the loss is in formerly single-family neighborhoods?	See Response to Comment 44-3 and **Section 4.2.1.2** regarding tree canopy.
92-9	Where does the Plan acknowledge that planting new trees takes 20-30 years to provide tree canopy, to shade houses, or to combat heat islands?	See Response to Comment 44-3 and **Section 4.2.1.2** regarding tree canopy.
92-10	Where does the Plan acknowledge that supply-side trickle-down housing takes 30-40 years to age into natural affordability?	See Responses to Comment 44-2 and 44-4.
92-11	Specifically, how many low-income affordable rentals will be built under Alternative 5? Will this be half of all new housing units, as called for by the Governor and the Department of Commerce? If not, what zoning and policies could mitigate the extreme lack of affordable rentals in Seattle?	See Responses to Comments 44-2 and 44-5.

Number	Comment Summary	Response
92-12	Several years ago, the City redefined "family-sized housing" as 2 bedrooms, rather than 3 bedrooms. How has that change contributed to the lack of family-sized rental housing being built, and what would be the effect of restoring the definition of family size to the common understanding of 3 bedrooms?	See Response to Comment 44-6.
92-13	What zoning tools are available, including MHA, to require more family-sized 3-bedroom rental housing at all income levels?	See Response to Comment 44-7.
92-14	Where does the housing plan acknowledge the needs of seniors and people with disabilities for accessible housing without stairs?	See Response to Comment 44-8.
92-15	Shouldn't courtyard apartments be an option, especially where "protected" tree occupy the center of a parcel? How can they be incentivized.	Comment noted. The proposed revisions to the Neighborhood Residential zone allows all middle housing types provided for in HB 1110, including courtyard apartments.]
92-16	Instead of insensitively promoting residential units with the first floor raised up, shouldn't the City be promoting Universal Design in all new construction, so that seniors and people with disabilities can find suitable homes in our future city?	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. See Response to Comment 44-8.
92-17	Since we no longer have single-family neighborhoods, should every developer be required to build sidewalks on their property, not just in multi-family or urban villages, as now?	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
92-18	What is the effect of lacking 11,000 blocks of sidewalks on our vision of a 15-minute city?	See Response to Comment 44-9.
92-19	Where does the Draft EIS acknowledge that City policy about anti-eviction ordinances, and the continuation and/or extensions for the school year for families with children and slowness in the courts threatens all rental housing remaining solvent in City of Seattle?	See **Section 3.8.3** Mitigation Measures under Tenant Protections for current policies. The action alternatives do not propose changes to anti-eviction policies, and therefore the EIS does not analyze impacts of such policies on rental housing development. However, the Proposed Plan describes measures to prevent displacement in the Housing Element including stabilizing communities, increasing community ownership, and redressing past discrimination and exclusion, particularly for Black and Indigenous communities.

Number	Comment Summary	Response
93	**Anderson**	
93-1	Similar content to Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.
94	**Avron**	
94-1	Advocate for bolder alternatives, all five alternatives fail to meet the moment to address the housing crisis.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. See **Section 4.2.1.1** regarding the affordable housing evaluation and **Section 4.2.1.3** regarding studied growth.
95	**Barcklow**	
95-1	Concern around impact of tree loss and specific recommendations to mitigate.	See **Section 4.2.1.2** regarding response on impacts of tree loss—including retaining existing 6" DSH and larger trees, probable scale of impact of tree loss, and time frame for mitigation—as well as discussion of proposed additional mitigation recommendations.
96	**Barker**	
96-1	Similar content as Letter 44 and 89-92. Seventeen sets of questions including affordability, housing supply, middle housing rental supply, environmental impact of tree canopy loss. Where is the definition of affordability? The HB 1110 definition should be used. What is the likelihood that this plan will result in affordable low-income housing provided by the market? Need for programs or zoning incentives for urban residential neighborhoods? How many low-income affordable rentals will be built under Alternative 5?	See Responses to Comments 92-1 through 92-17.
97	**Barrett**	
97-1	Same content as Letter 95 regarding tree canopy.	See **Section 4.2.1.2** for Response to Comment 95 and similar regarding tree canopy.
98	**Bartanen**	
98-1	Must include conservation of urban and non-urban species and strong tree protections.	See **Section 4.2.1.2** regarding tree canopy.
99	**Barton**	
99-1	Similar content as Letter 95 regarding tree canopy.	See **Section 4.2.1.2** for Response to Comment 95 and similar regarding tree canopy.

Number	Comment Summary	Response
100	**Baskin 1**	
100-1	Questions and concerns around tree canopy.	See **Section 4.2.1.2** regarding tree canopy.
101	**Baskin 2**	
101-1	Concerns and recommendations regarding tree canopy, some overlap with Letter 95.	Analyses in **Section 3.3** of the EIS identify the environmental benefits of trees and evaluate the potential impacts of the alternatives on tree canopy. As demonstrated in those analyses, the goals of increasing housing and increasing tree canopy are not mutually exclusive. See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy. Suggestions for policy changes are noted and are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
102	**Baskin 3**	
102-1	Concerns around loss of tree due to impact from development.	See **Section 4.2.1.2** regarding tree canopy.
103	**Bassage**	
103-1	Support for Alternative 5 and the Corridors concept and recommend it be applied on Rainier Avenue S. Own property at 4822 S Holly Street currently zoned NR3—request rezoning to LR3 or higher (as part of extending multifamily zoning along Rainer Ave).	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
104	**Bastian, Elizabeth**	
104-1	Support for Alternative 6, and disappointment in current Draft Plan as it will worsen the many crises. Plan should allow for high-rise apartments.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
105	**Beauregard**	
105-1	List of concerns around the increase in small apartments and townhouses, and decrease of single family homes.	The Preferred Alternative supports a variety of housing types (including middle housing consistent with HB 1110) that will support housing affordable to all economic segments of the population in Seattle. See also **Section 4.2.1.2** regarding tree canopy. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
106	**Beauregard**	
106-1	Ban or severely restrict AirBnBs and VRBOs.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and

Number	Comment Summary	Response
		alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
107	**Beffa**	
107-1	Similar content to Letter 83 regarding tree canopy. Three references to policies and questions around impact of the Plan on plants and animals, public land availability and how many trees will need to be planted to make up for trees removed by development.	See also **Section 4.2.1.2** for Response to Letter 83 and similar regarding plants, animals, and tree canopy.
108	**Bendich, Arnold**	
108-1	Same content as Letter 95 regarding tree canopy.	See **Section 4.2.1.2** for Response to Letter 95 and similar regarding tree canopy.
109	**Bendich, Judith**	
109-1	Need for housing for all economic segments. Skepticism of OPCD's proposals and projects, and request for new evidenced-based information in compliance with state law. Need to preserve historic resources and mitigation	This is a non-project EIS that analyzes the proposal and alternatives broadly across the study area consistent with WAC 197-11-442, including impacts to housing and historic resources. See **Section 3.9 Cultural Resources** of this EIS. See also **Section 4.2.1.1** regarding the affordable housing evaluation.
109-2	The need to preserve tree canopy and recommendation on how to reach 47% tree canopy.	See **Section 4.2.1.2** regarding tree canopy.
110	**Berg**	
110-1	Same content as Letter 95 regarding tree canopy.	See **Section 4.2.1.2** for Response to Letter 95 and similar regarding tree canopy.
111	**Berkley, Brennen 1**	
111-1	Bolder options than alternative 5 suggest. Increase housing projections beyond 120,000.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. The Preferred Alternative considers 120,000 housing units. See **Section 4.2.1.3** regarding studied growth. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
112	**Berkley, Brennen 2**	
112-1	Proposed EIS does not address existing harms or mitigation strategies caused by cars, such as hundreds of deaths and injuries. Explore more aggressive options for making streets safer such as pedestrian only streets, traffic	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. The potential safety impacts of the alternatives are described in **Section 3.10.2** Impacts of the Final EIS; the programs and strategies the City may use to improve safety are described in **Section 3.10.3 Mitigation Measures** of the Final EIS.

Number	Comment Summary	Response
	calming, narrowing or removing car lanes, speed cameras.	
113	**Berkley, Scott 1**	
113-1	Request to study 6 unit stacked flats in all neighborhoods, 4 story 12 unit apartments in all neighborhoods on lots of at least 4,000 sf, 40 story high rise mixed use apartment in all areas within 0.5 miles of light rail/ rapid transit.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. See also **Section 4.2.1.3** regarding changes to zoning standards in centers, including near transit. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
114	**Berkley, Scott 2**	
114-1	List of recommended changes including but not limited to expand all urban centers and regional centers, expand radius of neighborhood centers, increase FAR, etc.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. See **Section 4.2.1.3** regarding changes to zoning standards in centers and additional and/or expanded neighborhood centers. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
115	**Berliner**	
115-1	Same content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.
116	**Best**	
116-1	Similar content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.
117	**Bhagwandin, Eva 1**	
117-1	Same content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.
118	**Bhagwandin, Eva 2**	
118-1	Same content as Letter 95 regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
119	**Bhagwandin, Khai**	
119-1	Same content as Letter 95 regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
120	**Bhagwandin, Samuel**	
120-1	Same content as Letter 95 regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
121	**Bickel**	
121-1	Same content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.

Number	Comment Summary	Response
122	**Bicknell**	
122-1	Pass legislation that encourages more trees. Developers cut down mature trees that could remain if a building were redesigned.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers
123	**Bledsoe 1**	
123-1	Study impact of the 5 options on the plants and animals. Series of questions, concerns and recommendations on tree canopy.	See **Section 3.3 Plants & Animals** and **Section 4.2.1.2** for response to Letter 500.
124	**Bledsoe 2**	
124-1	Similar content to Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.
125	**BlueSpruce**	
125-1	Support for Alternative 2 as it would have the least impact on tree canopy. Includes similar content Letter 83 regarding plants, animals, and tree canopy.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.
126	**Blumenthal**	
126-1	Same content as Letter 95 regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
127	**Bonjukian**	
127-1	Allow more housing in Seattle. Increase neighborhood centers, allow multifamily housing close to all major parks, Urban centers should be allowed to build fully mid-rise buildings of up to 8 stories.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. See **Section 4.2.1.3** regarding studied growth, changes to zoning standards in centers, additional and/or expanded neighborhood centers, capacity near parks, and parking minimums.
127-2	Request to follow the guidance of Department of Commerce's Middle Housing Model Ordinance.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. The Preferred Alternative includes zoning revisions that are consistent with state guidance to support increased housing typologies affordable to all economic segments of the population.
128	**Booze**	
128-1	Seattle needs a bold housing plan to create a vibrant livable 15	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and

Number	Comment Summary	Response
	minute city with abundant housing. Includes six recommendations to achieve this goal.	alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. See **Section 4.2.1.3** regarding studied growth, changes to zoning standards in centers, additional and/or expanded neighborhood centers, corner stores, and parking minimums.
129	**Bos**	
129-1	Similar content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.
130	**Brady**	
130-1	Same content as Letter 95 regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
131	**Brandt**	
131-1	Similar content as Letter 83 regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding tree canopy.
132	**Brod**	
132-1	Comments on disconnect between housing unit need identified in the Draft Plan Housing Appendix and units studied in the Draft EIS. Developers need flexibility to build a wide variety of housing types to meet the needs of all types of households.	Comments noted. The One Seattle Plan identifies 80,000 housing units in relation to regionally adopted housing targets; however, the Preferred Alternative studies growth of 120,000 housing units. See also **Section 4.2.1.3** regarding changes to zoning standards in centers. Please also see the Housing Element and Housing Appendix in the Proposed Plan.
132-2	Request for Final EIS to study more neighborhood centers, to increase the boundary/walkshed to at least 0.25 walkshed, and the potential for more housing capacity within 0.25-mile and 0.5-mile walksheds. Request Final EIS include more analysis on which alternative would lead to creation of the most family-sized (2+ bedroom units) and to the most displacement of low and middle income households (less than 30% and 50% AMI, respectively). Request Final EIS included more analysis on the impacts of proposed height limits in Neighborhood Residential and Urban Neighborhoods to unit production, unit size, and feasibility for developers to take advantage of MHA and MFTE.	**Neighborhood Centers:** Comments noted and forwarded to City decision makers. See **Section 4.2.1.3** regarding additional and/or expanded neighborhood centers. **Family-sized units:** **Exhibit 3.8-41** shows projected net new housing units by housing type and size. While there is no way to predict the number of bedrooms in future housing supply, larger attached and detached housing (>1,200 sq. ft.) are the formats most likely to include 2+ bedrooms. **Displacement:** **Exhibit 3.8-48** shows projected housing units lost to demolition by affordability level. While data about the income level and tenure of households occupying these units, housing affordable to low- and middle-income households are more likely to be occupied by low- and middle-income households than are more expensive units. **Height limits:** The EIS considers height limits when determining the capacity of each parcel for new housing development as well as the likelihood that parcels would be redeveloped under each alternative. **Exhibit 3.8-41** summarizes findings in terms of housing unit production by housing type. **Exhibit 3.8-49** projects the number of new affordable housing units produced by MHA and MFTE associated with each alternative.

Number	Comment Summary	Response
132-3	Seen overwhelmingly positive impacts of change and growth in own neighborhood (Roosevelt/Ravenna) and would like to see these kinds of changes spread across the city, which requires adding more housing capacity.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
133	**Broderick**	
133-1	Similar content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.
134	**Brooking**	
134-1	Similar content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.
135	**Broska**	
135-1	Alternative 5 should be modified with higher growth targets to accommodate for the housing crisis. Study granting tax breaks and fee deferrals to housing projects that include affordable units to help increase housing.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. See **Section 4.2.1.3** regarding studied growth.
136	**Bruan-Kelly 1**	
136-1	Same content as Letter 95 regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
137	**Bruan-Kelly 2**	
137-1	Concern around mass building of homes with little attention paid to the environment, specifically trees.	Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. See also **Section 4.2.1.2** for responses to comments on trees.
138	**Brunton**	
138-1	Same content as Letter 95 regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
139	**Burrill**	
139-1	Similar content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.
140	**Bushue**	
140-1	Same content as Letter 95 regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.

Number	Comment Summary	Response
141	**Byrd**	
141-1	Same content as Letter 95 regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
142	**C, Nancy**	
142-1	Concern that the Comp Plan does not seem to consider nature, value of trees, and especially mature trees.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. See also **Section 4.2.1.2** regarding tree canopy.
143	**Candiotti**	
143-1	Support Alternative 2 or 4. Similar content as Letter 83 regarding plants, animals, and tree canopy.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.
144	**Cannon**	
144-1	Same content as Letter 95 regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
145	**Cantrell**	
145-1	Need more housing, and increase "urban villages." Alternative 5 is the minimum we should be considering and welcome an even bolder plan.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. See **Section 4.2.1.3** regarding studied growth.
146	**Carre**	
146-1	Do not support rezone of 130th Station. Against urban villages and lukewarm to the idea of neighborhood anchors.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required.
147	**Carter**	
147-1	Same content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.
148	**Catena**	
148-1	Same content as Letter 95 regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
149	**Cave**	
149-1	Same content as Letter 95 regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.

Number	Comment Summary	Response
150	**Chadsey**	
150-1	Similar content as Letter 95 regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
151	**Chadsey**	
151-1	Similar content as Letter 95 regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
152	**Charbonneau**	
152-1	The Seattle plan is extremely wordy, full of vague details, maps are not detailed enough, and extremely hard to digest. Follow the state bill and abandon the comprehensive plan.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
153	**Chavez**	
153-1	Same content as Letter 95 regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
154	**Chernyshev**	
154-1	The City did not listen to the overwhelming majority's call for an Alternative 6 vision, which would lower the cost of housing.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. See **Section 4.2.1.3** regarding studied growth.
155	**Church**	
155-1	Same content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.
156	**Clabough**	
156-1	We are missing middle zoning; we need more middle housing. I encourage more mixed commercial and residential.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives, so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. The Preferred Alternative includes expanded opportunities for a variety of housing typologies (including middle housing) as well as mixed use development.
157	**Clark, Lisa 1**	
157-1	Same content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.
158	**Clark, Lisa 2**	
158-1	Same content as Letter 95, regarding tree canopy	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.

Number	Comment Summary	Response
159	**Clark, Dave**	
159-1	Concern around lack of detailed mathematical and technical analysis concerning the impacts of adding 100,000 new housing units to the City with precious and limited natural landscape. There should be a better analysis regarding impacts on landscape and trees as an amendment.	Please see **Section 4.2.1.2** for responses to comments in Letters 83 and 95, concerning the process for identifying significant adverse impacts. Also see **Section 4.2.1.2** for responses to comments in Letter 500 and similar, concerning implementation of and the effectiveness of the City's Tree Protection Ordinance. Analyses in the EIS are consistent with SEPA requirements for programmatic, non-project reviews, per WAC 197-11-442.
160	**Clifton**	
160-1	Same content as Letter 95, regarding tree canopy	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
161	**Close 1**	
161-1	Six sets of study recommendations including impacts of higher floor area ratios, how and where to place social housing, eliminate parking minimums, etc.	See **Section 4.2.1.3** regarding studied growth, changes to zoning standards in centers, and parking minimums. See also **Section 4.2.1.2** regarding tree canopy.
162	**Close 2**	
162-1	Study impacts of density and/or height bonus for middle housing projects with 2-6 units in residential areas that preserve additional green space in their yards beyond minimums required.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. **Section 3.6.3** includes "incentives for ground floor open space" as a potential mitigation measure.
163	**Cohen-Lewe, Ashley**	
163-1	Same content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.
164	**Cohen, Lori**	
164-1	Acknowledge the historical and natural resources in the draft comprehensive plan and Draft EIS.	See EIS Section 3.9 for an evaluation of impacts to cultural and historic resources including mitigation.
164-2	Concern on the Roosevelt Urban Center zone being inconsistent with Land Use Policy 2.9. Specific land use policy additions suggested to recognize and plan for the role and character of different neighborhoods.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
164-3	Concern on displacement in zone RCN NHD.	The potential for demolition and replacement of existing housing under each alternative is analyzed in the EIS.

Number	Comment Summary	Response
		Comments regarding policies to protect historic housing are noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. See also **Section 4.2.1.1** regarding the affordable housing evaluation.
164-4	Same content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.
165	**Colledge**	
165-1	Similar content as Letter 95, regarding tree canopy	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
166	**Cramer**	
166-1	Support for higher density in the Roosevelt South MR Zone. This location is the perfect transition zone candidate for MR (6 story apartment building) zoning and it is close to existing tall infrastructure, a freeway, Light rail station and other transit lines.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. See response to Comment 54-1.
167	**Crocker**	
167-1	Concern about the success of the 30% tree canopy goal. How have you been able to calculate the recovery of lost tree canopy? How much public land space do you have for increasing tree canopy, and who will take care of all the new trees?	See **Section 4.2.1.2** for responses regarding tree canopy and the effectiveness of the City's Tree Protection Ordinance.
168	**Crocker**	
168-1	Same content as Letter 95, regarding tree canopy	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
169	**Crockett**	
169-1	Concerns around tree canopy, and support for Alternative 2 as it allows for population and job growth with the least negative impact on tree canopy and biodiversity. Support for Birds Connect Seattle message and attached email from Friends of Seattle's Urban Forest.	Comments noted and forwarded to City decision makers. See responses to Comments 20-1 through 20-6 from Birds Connect Seattle. See **Section 4.2.1.2** for responses to comments from Friends of Seattle's Urban Forest. Please note that the City of Seattle continues to have a goal of achieving 30% tree canopy cover by 2037.

Number	Comment Summary	Response
170	**Cunningham Adams**	
170-1	Study the impact of higher FARs for middle housing, how and where to place social housing projects in every neighborhood, eliminating parking minimums citywide, and allowing bolder height and density bonuses within ¼-mile of transit.	See **Section 4.2.1.3** regarding changes to zoning standards and parking minimums and **Section 4.2.1.1** regarding the affordable housing evaluation.
171	**Cushman-Macey**	
171-1	Disappointment that over 60% of people wanted Alternative 5 or more. Terrible shame that you are listening to wealthy minority instead of the experts and the public.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
172	**Dack**	
172-1	Similar content as Letter 83, regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.
173	**Dahl**	
173-1	Support for the Housing Abundance Map, and request to build more housing and more affordable housing. Current plans falls short of housing needs.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. See also **Section 4.2.1.2** regarding studied growth and additional and/or expanded neighborhood centers. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
174	**Daniel**	
174-1	Widespread support for more dense housing near 133rd and 1st Ave area and especially support for the Haller Lake United Methodist Church property. Request that the Draft EIS be revised to include NC2-55 zoning for the church property, Lots 3, 4 and 5, of blocks 65, in the HE Orr Park Division No. 6 so that a development might be considered that includes both commercial and residential components.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
175	**Daniels**	
175-1	Advocating for more housing, as the current plan is lacking, and a list of reasons to address common criticisms including displacement,	Comments noted and forwarded to City decision makers. See also **Section 4.2.1.3** regarding studied growth and additional and/or expanded neighborhood centers.

Number	Comment Summary	Response
	character of the neighborhood, traffic, and benefits.	
176	**Danner**	
176-1	Adoption of an effective Urban Freight Management Plan should be called out as mitigation for transportation impacts which the EIS predicts will be significant under all five alternatives.	The Seattle Transportation Plan includes a Freight and Urban Goods Movement Element. The Freight and Urban Goods Element provides information specific to the planning, design, construction, maintenance, and operation of the transportation network. The STP and the Freight and Urban Goods Movement Element builds on and supersedes the 2016 Freight Master Plan (FMP). All transportation modes, vehicle types, and facilities used in goods movement are considered in the Freight Element, with a focus on truck transport and portions of the transportation network used to access maritime, manufacturing, and industrial centers (MICs) and connections to the regional freight system.
177	**Davis Deborah**	
177-1	Similar content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
178	**Davis Courtney**	
178-1	Similar content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
179	**Devi**	
179-1	Similar content as Letter 83, regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.
180	**Diaz**	
180-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
181	**Dickerson**	
181-1	Concern for tree canopy. What is the plan for encouraging the growth of large trees, is there a plan to build the tree canopy in Seattle?	See **Section 4.2.1.2** for responses regarding tree canopy.
182	**Dolan**	
182-1	Similar content to Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
183	**Doran**	
183-1	Similar content as Letter 83, regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.

Number	Comment Summary	Response
184	**Downward**	
184-1	Three suggestions on the climate and sustainability element regarding language, tree canopy and adding a fish and wildlife conservation policy.	Comment noted. This comment is beyond the scope of environmental review of the One Seattle Plan so no response is necessary. and forwarded to City decision makers. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
185	**Du Mas, Haisten, Siegert, Talbot, Jessup, Costello, Ji, and Chen**	
185-1	Owners of 415, 421, 425 and 431 16th Avenue E. Request an upzone to better match adjoining blocks, and additional EIS analysis and text revision to the Code and the Plan that would provide continued flexibility.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
185-2	Requested policy changes and related implementing regulations.	Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
185-3	Final EIS should study the addition to the easterly block of 16th Avenue E between E Republican Street and E Harrison Street, to the adjoining urban center. Suggested revisions to the Final EIS to more clearly acknowledge residential neighborhoods directly adjacent to centers.	The subject block is included in the Capitol Urban Center in the Proposed Plan and is analyzed in the EIS as part of the Preferred Alternative.
186	**Duggan**	
186-1	Support the combined plan but it does not go far enough, advocate for more homes. Would like to see more smaller-scale commercial accessible from neighborhoods and near transit centers, as well as more childcare and locations for child care in the neighborhoods.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
187	**Dunn**	
187-1	Support for Alternative 5 and additional height and density studied in small parcels zoned NC-55 to encourage development and create workable Mandatory Housing Affordability program. List of negative impacts of MHA formula including but not limited to diminished existing value of sites and made any new units that	See response to Comment 55-1.

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	could developed under MHA more expensive. Suggested multi-part revisions to NC-55 sites.	
188	**Durslag 1**	
188-1	Setback requirements for multifamily development on arterials do not allow adequate space for both pedestrian access and substantial tree canopy to mitigate noise, air and particulate pollution, and heat island effects.	See also **Section 4.2.1.2** regarding tree canopy. Space for tree canopy is largely determined by the Seattle Right-of-Way Improvements Manual, which determines the minimum right-of-way and landscape strip (for street trees) widths. In addition, LR zones would continue to require a Green Factor score of .60 or higher, which is achieved through plantings and landscape features. A private developer may choose to bolster tree canopy by planting trees in the setback on private property. The Preferred Alternative does propose slightly increasing the setback requirements in LR zones. Currently, rowhouses and apartments in LR zones must be setback a minimum of 5 feet. The proposed zoning would require an average front setback of 7 feet and minimum of 5 feet for all housing types. The 2 additional average feet may be used to accommodate plantings, especially if clustered to provide ample space for tree roots away from buildings' foundations.
188-2	What is the supporting data and research behind the Draft EIS assertion that "No significant unavoidable adverse impacts to air quality and greenhouse gas emissions are anticipated."	See Final EIS **Section 3.2.2** regarding air quality and GHG impacts and **Section 3.2.3** regarding mitigation.
188-3	How much of Seattle's development under each of the alternatives is in areas currently without sidewalk? What data and research do you have regarding the walkability for areas currently without sidewalks, and the number of miles of sidewalk needed in order to meet a minimum standard of walkability?	See Response to Comment 44-9.
188-4	What plans does the City have to add parks in areas with heavy concentration of apartment buildings? What land does the City intend to buy for this purpose? How many acres would this need to encompass? How many trees would need to be planted in these parks to mitigate tree loss on other parcels?	See **Section 4.2.1.2** regarding tree canopy and **Section 4.2.1.3** regarding housing and provision of parks and open space.
188-5	When no parking is provided for private automobiles in order to encourage use of public transportation, grocery stores	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision

Number	Comment Summary	Response
	must be within walkable distance from population centers. What is the number of supermarkets that will be required to support increased density in each zone? What location, within a range, will these supermarkets need to be in, and what is the availability of land or structures for them? What incentives will the city need to provide in order to lure supermarkets back into the city in an amount sufficient to meet the development need, and for developers to put aside ground-level units for supermarkets?	makers. Grocery stores are permitted within neighborhood centers, urban centers, regional centers and in commercially zoned Urban Residential areas.
188-6	What is the anticipated family size of Seattle's population in the next 20 years? To what extent will family size differ by income, ethnicity, race, or other family background? To what extent will the standard of two bedrooms as the criterion for a family-sized unit meet the need of Seattle's families? To what extent will two bedrooms as family size provide equity?	Population, race and ethnicity, and household size are discussed in Final EIS **Section 3.8** (e.g., see Final EIS **Exhibit 3.8-6** for households by tenure and size and Final EIS **Exhibit 3.8-41** for projected net new housing units by type and alternative). See also response to Comment 44-6.
188-7	How will Seattle's anticipated transportation pattern, using the bus and rail system that is available only in major corridors, enable parents to get children to and from daycare and still get to their employment on time, considering that multiple parents will not work on direct bus lines? How will this transportation and overall land use allow daycares to afford rent in sufficient areas of the city to meet the need?	The Final EIS describes the future assumptions for the transit network which will include Link light rail service extensions, new Metro RapidRide service, and local Metro bus routes. Metro regularly adjusts its service to adjust to evolving demand and would continue to do so. In addition, Metro offers an on-demand transit option (Metro Flex) in areas of the City that are not served by nearby fixed-route service. Final EIS **Section 3.8** also considers employment by alternative, including job growth in neighborhood centers and corridors which have the potential to provide more neighborhood-serving businesses and services (including child care facilities) in areas of the city that currently have few options. In addition, child care centers are currently allowed in numerous zones throughout the city, including residential, mixed use, and commercial zones.
188-8	To what extent will Seattle's future housing be stair-free and suitable for seniors?	See response to Comment 44-8.
188-9	Similar set of questions and concerns as Letter 83, Letter 95, and Letter 500 regarding impacts to plants, animals, and tree canopy, as well as the effectiveness of the City's Tree Protection Ordinance. Concern about impacts, including	See **Section 4.2.1.2** for responses to comments in Letter 83, Letter 95, and Letter 500 (and similar letters) regarding plants, animals, and tree canopy. The potential impacts of the alternatives (including varying degrees of development and redevelopment projects that would be expected to occur) on

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	heat island effects, of development on plants and animals within the Seattle city limits.	plants and animals are described and evaluated in **Section 3.3.2** of the EIS. Those analyses also address heat island effects.
188-10	What is the projected increase in stormwater runoff and what costs are associated with on-site and alternative city water management policies of stormwater and pollutant runoff as a result?	See Final EIS **Section 3.12.2** regarding impacts to utilities, including stormwater, under each of the alternatives.
189	**Durslag 2**	
189-1	Recommendations for revisions to the text of the Draft Plan.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
190	**Dwyer**	
190-1	Support Alternative 5. Study impacts of expanded high-rise zoning in urban and residential neighborhoods.	Comments noted and forwarded to City decisions makers. See also **Section 4.2.1.3** regarding changes to zoning standards in centers.
191	**Edlund**	
191-1	Support for either Alternative 2 or 4. Similar content as Letter 83, regarding tree canopy, with additional questions about specific statements.	Comments noted and forwarded to City decisions makers. See **Section 4.2.1.2** for response to Comment 83 and similar regarding tree canopy.
192	**Eldridge**	
192-1	Variation of Letter 83 regarding plants, animals, and tree canopy with additional questions around tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding tree canopy. Also see **Section 4.2.1.2** for responses to comments in Letter 500 and similar regarding concerns about the effectiveness of City's Tree Protection Ordinance.
193	**Eliason**	
193-1	The plan does not do enough to redress the harm and poor outcomes stemming from Seattle's racist and classist land use regulations.	Each section of the Final EIS impacts analysis includes a discussion of equity and climate related impacts including inequities related to race/ethnicity and household income. For example, the Final EIS acknowledges that housing policy and zoning laws have a history of causing harm to Black, Indigenous, and People of Color in Seattle—EIS **Section 3.6.2** evaluates land use patterns proposed under each alternative and potential resulting compatibility conflicts for their likelihood to intensify or lessen these historical inequities. See also Response to Comment 92-19 addressing housing policies and redressing past discrimination and exclusion.

Number	Comment Summary	Response
193-2	The plan does not do enough to address broad housing affordability crises in the city. Only Alternative 5 maximizes the number of affordable homes.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. See **Section 4.2.1.1** regarding the affordable housing evaluation.
193-3	The plan does not center climate adaptation in the middle of a worsening climate crisis	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. EIS **Sections 3.2.2** and **3.5.2** consider air quality and noise impacts, respectively, including exposure to air and noise pollution. See Response to Comment 5-3 regarding high-volume traffic roadways beyond freeways.
193-4	The plan is not coordinated with the Seattle transportation plan and levy, nor commits to a transformative turnaround in any timeline that matters.	See Response to Comment 5-6.
194	**Ellison**	
194-1	Variation of the content in Letter 95, regarding tree canopy with additional questions and concern.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
195	**Engstrom**	
195-1	A course or information on how to navigate all the documents and how they all connect with others would be helpful.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. The city continuously looks for opportunities to increase transparency in its documents and their relationship to proposed actions.
195-2	Concern for retention of trees and eliminating heritage trees through the new tree policy. Questions about how this plan affects trees in School Districts when making changes on school property.	See the City's summary of changes of the new ordinance in July 2023: All heritage trees designated by the City's heritage tree program (now called Tier 1 trees) must be retained unless hazardous, and new development in Neighborhood Residential zones require trees be planted along the sidewalk in the right of way.[103] Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
196	**Estrada**	
196-1	Same content as Letter 95, regarding tree canopy	See **Section 4.2.1.2** for Response to Letter 95 and similar regarding tree canopy.

[103] See: https://buildingconnections.seattle.gov/2023/07/27/new-tree-protection-ordinance-goes-into-effect-on-july-30/#.

Number	Comment Summary	Response
197	**Exit**	
197-1	Same content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for Response to Letter 83 and similar regarding plants, animals, and tree canopy.
198	**Fahrenbruch**	
198-1	Similar content as Letter 95, regarding tree canopy	See **Section 4.2.1.2** for Response to Letter 95 and similar regarding tree canopy.
199	**Faste**	
199-1	Same content as Letter 95, regarding tree canopy	See **Section 4.2.1.2** for Response to Letter 95 and similar regarding tree canopy.
200	**Fayyad**	
200-1	Same content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for Response to Letter 83 and similar regarding plants, animals, and tree canopy.
201	**Faz**	
201-1	Study Alternative 6 that residents demanded in 2022 scoping. We cannot continue with the status quo of low housing stock, decreasing housing affordability, and minimal varieties of housing. Ensure bulking of regulations such as FAR, lot coverage, parking minimums be lifted on every residential lot in the city.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. See **Section 4.2.1.3** regarding studied growth, changes to zoning standards in centers, and neighborhood centers.
202	**Fellows**	
202-1	This update implements HB 1110 through the proposed action, therefore the impacts of implementing HB 1110 should be documented as an action rather than included in the No Action alternative.	The No Action Alternative does not include implementation of HB 1110. The action alternatives include revisions to the Comprehensive Plan to implement changes required by HB 1110, including promoting more middle housing.
203	**Fernandes**	
203-1	Questions regarding tree canopy such as what the impact of the Plan is on non-human life, how to ensure existing forests are not destroyed, provide a map of public land where you plan to reforest.	See **Section 4.2.1.2** for responses regarding tree canopy and implementation of the City's Tree Protection Ordinance.
204	**Fertal**	
204-1	Same content as Letter 95, regarding tree canopy	See **Section 4.2.1.2** for Response to Letter 95 and similar regarding tree canopy.

Number	Comment Summary	Response
205	**Field**	
205-1	Same content as Letter 95, regarding tree canopy	See **Section 4.2.1.2** for Response to Letter 95 and similar regarding tree canopy.
206	**Filipovic**	
206-1	Similar content as Letter 83, regarding tree canopy, with additional questions on specifics of increasing trees using city owned property, how many trees must be planted in those areas to replace those that are lost in the private sector.	See **Section 4.2.1.2** for Response to Letter 83 and similar regarding tree canopy.
207	**Foltz**	
207-1	Proposed alternative does not address future housing needs. The current alternative falls well short of the need for affordable housing. Request 4 analysis of increasing new homes, expands neighborhood center designation, permits small apartments and quadplexes in formerly single family only neighborhoods.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. See **Section 4.2.1.3** regarding changes to zoning standards in centers and additional and/or expanded neighborhood centers and **Section 4.2.1.1** regarding the affordable housing evaluation.
208	**Ford**	
208-1	Support for Alternative 5. Suggest studying impacts of additional neighborhood centers in urban neighborhoods, as well as greater height and density bonuses within a half mile of transit.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. See **Section 4.2.1.3** regarding changes to zoning standards in centers and additional and/or expanded neighborhood centers.
209	**Franco**	
209-1	Same content as Letter 95, regarding tree canopy	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
210	**Freidberg**	
210-1	Similar content as Letter 95, regarding tree canopy	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
211	**Friedmann**	
211-1	List of 4 proposed changes; include the Seward Park Neighborhood Center as studied Draft EIS Alternative 5, implement Corridor designation in the streets surrounding Seward park, raise FAR and eliminate parking mandates.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. See **Section 4.2.1.3** regarding changes to zoning standards in centers, additional and/or expanded neighborhood centers, and parking minimums.

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212	**Fristoe**	
212-1	Same content as Letter 95, regarding tree canopy	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
213	**Gadeken**	
213-1	The city should enact Alternative 6 or improve the Plan by allowing bigger buildings, add more neighborhood centers, zone for fourplexes and sixplexes, embrace transit-oriented development, remove parking requirements, flexibility to increase corner stores.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. See **Section 4.2.1.3** regarding changes to zoning standards in centers, additional and/or expanded neighborhood centers, and parking minimums.
214	**Gaul**	
214-1	Expanded version of letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.
215	**Ghiorso**	
215-1	Similar content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.
216	**Gillenwater 1**	
216-1	The City did not listen to the overwhelming majority's call for an Alternative 6 vision. To create a more affordable city, the Plan should allow much more housing to be built away from noisy, polluted arterials. Think the Plan should expand the upzone walk shed around high frequency transit to at least ½-mile in Ballard in particular.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. See **Section 4.2.1.3** regarding studied growth.
217	**Gillenwater 2**	
217-1	The City did not listen to the overwhelming majority's call for an Alternative 6 vision. Instead the current plan will worsen congestion and pollution by forcing more people into long commutes. Apply Vision Zero best practices in North Seattle in particular on roadways like Aurora Ave.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. See **Section 4.2.1.3** regarding studied growth and Final EIS Sections 3.2 and 3.10 regarding air quality, GHG emissions, and transportation impacts.
218	**Gillenwater 3**	
218-1	The City did not listen to the overwhelming majority's call for an Alternative 6 vision. To create a more equitable sustainable city,	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision

Number	Comment Summary	Response
	the Plan should allow for corner stores in many more places. Look into zoning and other changes to the Shilshole marina area in Ballard to allow a more vibrant and walkable mixed use area given its access to Golden Gardens.	makers. See **Section 4.2.1.3** regarding studied growth and capacity near parks.
219	**Gillenwater 4**	
219-1	Challenge flawed analysis presented in the summarized impact of the five alternatives with respect to greenhouse gas emissions (Draft EIS Exhibit 1.6-30). Acknowledge the flaws and apply a proper impact analysis methodology that Alternative 5 would be highly likely to result in greater overall avoided GHG emissions.	Regional GHG analysis is available through the VISION 2050 SEIS[104] and the King County GHG analysis conducted in 2022 and recently under HB 1181. Please note the central Puget Sound including Seattle are not required to respond to HB 1181 until 2029. The EIS does compare the alternatives relative to the City's plans in **Section 3.2 Air Quality & GHG Emissions**. By planning for growth consistent with the VISION 2050 Regional Growth Strategy the City is fitting into the regional evaluation. Planning for growth in the city especially in areas associated with existing and planned transit helps provide a growth pattern that can reduce GHG emissions particularly on a per capita basis as recognized in RCW 36.70A.070 and HB 1181.
220	**Gingerich**	
220-1	Same content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.
221	**Gloger**	
221-1	Suggest Alternative 2 be further examined and modified. Concern about loss of trees in Seattle, with a list of expanded questions similar to Letter 95 and Letter 83.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. The impacts of the Preferred Alternative on plants and animals are evaluated in **Section 3.3.2** of the Final EIS. See also **Section 4.2.1.2** for responses to comments in Letter 500 and similar, concerning implementation of and the effectiveness of the City's Tree Protection Ordinance.
222	**Godfrey 1**	
222-1	More study is needed if our most vulnerable endangered wildlife, the Southern Resident Killer Whales were excluded. Concern and questions regarding tree canopy.	See Response to Comment 20-6 regarding fish and wildlife and tree retention.

[104] See VISION 2050 SEIS at https://www.psrc.org/planning-2050/vision-2050/environmental-review and PSRC Air Quality Analysis https://www.psrc.org/media/1803 updated every six years. See also Puget Sound Regional Emissions Analysis Project, King County, 2022 https://kingcounty.gov/en/dept/executive/governance-leadership/climate-office/focus-areas/greenhouse-gas-emissions. Commerce funded 11 county GHG analysis including for King County. Results will inform the County and all cities including Seattle: https://www.commerce.wa.gov/growth-management/climate-planning/.

Number	Comment Summary	Response
223	**Godfrey 2**	
223-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for Response to Letter 95 and similar regarding tree canopy.
224	**Godon**	
224-1	The plan needs to much further in allowing more housing options in more of the city. We need the Plan to align with state law and allow sixplexes throughout the city and middle housing in many more areas.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. See **Section 4.2.1.3** regarding studied growth and **Section 4.2.1.1** regarding the affordable housing evaluation.
225	**Grant, Andrew**	
225-1	List of 30 general comments and requests for further analysis and information including extending and revising various center boundaries. Questions about content in Chapter 1. Study the elimination of all parking requirements in the Final EIS.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. See **Section 4.2.1.3** regarding parking minimums.
225-2	Provide an Alternative in the Final EIS that can address 50% the current need for income restricted housing (housing available to those at 80% AMI or below) in a pattern consistent with Alternative 5.	See **Section 4.2.1.1** regarding the affordable housing evaluation
225-3	Comments and requests for further analysis and information including extending/revising various center boundaries and specific questions about content in Chapter 1.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. See **Section 4.2.1.1** regarding the affordable housing evaluation. See **Section 4.2.1.2** regarding plants, animals, and tree canopy. See **Section 4.2.1.3** regarding studied growth, changes to zoning standards in centers, additional and/or expanded neighborhood centers, capacity near parks, and parking minimums.
225-4	Suggested revisions to Chapter 2 and studied alternatives.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. See **Section 4.2.1.3** regarding studied growth, Final EIS **Chapter 2** for a description of the Preferred Alternative, and Final EIS **Chapter 3** for an evaluation of the Preferred Alternative.

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225-5	Requests for additional analysis in Section 3.1 Earth & Water Quality. Request for specific mitigation strategies for areas that will see a significant sea level rise by 2100 and to increase density in areas with a low burden level in Exhibit 3.1-12.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. See Final EIS **Section 3.1.3** for mitigation strategies which includes reference to the Climate Element a new chapter of the City's Plan. Area 7 has the greatest exposure to sea level rise per **Exhibit 3.1-11** and has the lowest residential growth of the studied alternatives. See **Exhibit 1.4-9**.
225-6	Requests for additional analysis and clarifications in Section 3.2 Air Quality & GHG Emissions.	In the Final EIS the following is addressed: ▪ Dwelling units within 200 meters of high travelled roads the Preferred Alternative is evaluated similar to other alternatives, see **Exhibit 3.2-18**. A description of existing and potential mitigation measures to address air quality and sensitive uses including housing is included in **Section 3.2.3**. ▪ **Exhibit 3.2-5**, Total Citywide Road Transportation Emissions GHG (MTCO2e) by Alternative: GHG per capita numbers are added below each alternative. ▪ **Exhibit 3.2-7**, Road Transportation Pollutant Emissions: Criteria pollutants are presented consistent with professional practice, but emissions comparing alternatives including the Preferred Alternative are provided.
225-7	Requests for additional analysis in Section 3.3 Plants & Animals. Why are tree management units by zone type and not by subarea? Please provide additional information that makes it clear that 6PPD-quinone originates from tires.	Information in **Exhibit 3.3-1** and related discussions comes from the City's 2022 Tree Canopy Analysis. That analysis divided the city into management units based on land uses. Given that the alternatives under consideration in this EIS concern land uses, that approach is appropriate for this analysis. The discussion of contaminants in stormwater runoff has been revised to acknowledge the source of 6PPD-quinone.
225-8	Requests for additional analysis in Section 3.4 Energy & Natural Resources. Request to provide a comparative building EUI for single-family homes based on existing energy data, clarify how the Transportation Plan factors into VMT and fuel usage numbers, and noted error in Exhibit 3.4-9 title.	The **Exhibit 3.4-9** caption is revised to "Net Annual Transportation Fuel Usage—Alternative ~~3~~ 5 (Trillion Btu)" in the Final EIS. There is no EUI for single family homes based on existing energy data available at this time. Regarding VMT and fuel usage, as density around transit increases, VMT and fuel usage is likely to go down. See **Section 3.2 Air Quality** and GHG Emissions for list of mitigation measures to reduce VMT including investments in multimodal transportation facilities.
225-9	Request to provide information that acknowledges the impact that a lack of air conditioning and need for passive cooling strategies (i.e., open windows) has on noise pollution in neighborhoods along arterials	A shown on **Exhibit 3.5-15, Exhibit 3.5-16, Exhibit 3.5-17, Exhibit 3.5-18**, and **Exhibit 3.5-19** modeled traffic noise levels would not exceed 65 dBA CNEL (which is the exterior noise level that can be attenuated to the recommended interior noise level of 45 dBA for residential uses) and the increases in traffic noise from existing conditions to buildout of each of the alternatives would be below the threshold of 1.5 dBA. Passive cooling and ventilation strategies requiring leaving windows open may result in slightly increased interior noise levels. However, it is not

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		possible to determine exterior-to-interior noise attenuation provided by open windows as several factors such as size of window opening, number of windows open, tilt of windows, architectural features, and distance to roadway need to be considered.
225-10	Suggested revisions and requests for additional analysis in Section 3.6 Land Use Patterns & Urban Form, including a request to clearly differentiate between the updated plan and the previous one to address historical inequities and suggested changes to dimensional standards to create additional capacity.	Comments noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. See **Section 4.2.1.3** regarding studied growth, changes to zoning standards in centers, additional and/or expanded neighborhood centers, capacity near parks, and parking minimums. Zoning under the Preferred Alternative will remove barriers to housing development in all neighborhoods, diverging from the exclusionary zoning of the past. See also Responses to Comment 92-19, 225-12, and **Section 3.8.3** regarding measures to address disparate impacts of past policies and regulations. The Preferred Alternative's zoning proposals include several of these suggestions, including lot coverage of 50% in Neighborhood Residential zones. A potential mitigation measure addresses point access blocks (see **Section 3.6.3**), which are more feasible with relaxed side setback rules and result in a unified street incrementally over time. The shadows analysis identifies loss of solar access to public spaces during wintertime, when sunlight is most beneficial for heat and human enjoyment, as well as changes in solar access to existing trees. The Final EIS analysis does not emphasize summertime shadow impacts as adverse, since these shadows may help mitigate urban heat; the considerations shadows addressing urban heat is added under **Exhibit 3.6-76**. It includes a potential mitigation measure for future street tree species to be selected for hardiness in shady conditions. Final EIS **Exhibit 3.6-78**'s footnote notes that **Exhibit 2.1-1** in **Chapter 2** cross-walks the existing place types (which remain in Alternative 1) with proposed place type names under Alternatives 2-5. The Preferred Alternative includes changes to the Midrise zone at 85 feet. See **Appendix J**, Proposed Legislation. Center standards are planned for Phase 2 legislation. In EIS **Exhibit 3.6-93**, the future AU/acre is estimated to be lower at NE 130th as compared to 15th and 145th because Alternative 2 includes higher intensity residential zones in the 15th and 145th area than at the 130th station area. In Alternative 5, even when more intense zoning is applied and over a larger area in the 130th area, I-5 and steep slopes reduce the developable area within the urban center boundary, many parcels are not considered redevelopable, and larger areas have existing lower density residential than the 145th area, together resulting in a lower AU/acre despite a larger increase in housing supply. The Preferred Alternative would rezone single-family properties in

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		the 130th Street station area to multifamily or commercial zones, just like Alternative 5. PSRC calls for regionally designated Urban Growth Centers to plan for at least 45 AU/acre and Metro Growth Centers for 85 AU/acre. Note that AU/acre measures gross density over large areas that include public rights-of-way, parks, natural landforms and waterways, and other encumbrances that reduce developable land; it is not net density of a single project. The King County Countywide Planning Policies have higher AU/acre limits of 60-120 depending on center type. These are referenced in **Section 3.6 Land Use Patterns & Urban Form** under the Preferred Alternative. These intensity parameters are largely dependent on market forces. Eventually densities beyond the 20-year planning timeframe studied may be higher and closer to the ranges mentioned.
225-11	Suggested revisions and requests for additional analysis in Section 3.7 Relationship to Plans, Policies, & Regulations. Please confirm and provide one alternative that achieves the County's goals for housing targets by affordability for all affordability bands at and below 80% AMI. Please provide and study a regional center located in the South End, as requested by a number of members of the South End Community.	Comments noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. The action alternatives would create a new housing element to meet new GMA requirements and address additional housing types and affordability levels. See **Section 4.2.1.1** regarding the affordable housing evaluation. See **Section 4.2.1.3** regarding additional and/or expanded neighborhood centers.
225-12	Suggested revisions and requests for additional analysis in Section 3.8 Housing. Request for a map of zoning changes intended to increase density and racial diversity in study areas with a higher percentage of "White, Non-Hispanic" residents than the Seattle average and in areas at low risk of displacement. How do the total projected new income-restricted units for each alternative compared to the current deficiencies identified in the EDI Community Indicators Report? For Alternative 5, identify strategies to reduce the ratio of net new units to units demolished to a number lower than Alternative 3 or increase the number of allowed housing units.	#106: Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. #107: The non-Project EIS evaluates place types for each alternative, appropriate to a 20-Year Comprehensive Plan. The City has developed draft zoning that draws from the future land use concepts in the One Seattle Plan and the EIS Alternatives. See **Appendix J**. #108: The One Seattle Plan outlines the monitoring and accountability framework for the Plan, which will include tracking indicators that tell us whether we are making progress on equity outcomes envisioned by the Plan. Please see page 12 in the Proposed Plan's introduction for more on this and how monitoring will build on the City's recent reporting on equitable development indicators and housing needs. Data from the from the indicators report and other parts of the Equitable Development Monitoring Program helped to inform new and expanded policies in the Plan that advance racial equity. #109: Regarding strategies to reduce units demolished per net new unit, this is determined by the location and nature of rezones. Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One

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		Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers.
225-13	Suggested revisions and requests for additional analysis in Section 3.10 Transportation.	#110: The VMT findings of the Final EIS are provided in **Exhibit 3.10-38, Exhibit 3.10-47, Exhibit 3.10-56**, and **Exhibit 3.10-65** and summarized together in **Exhibit 3.10-79**. Based on the regional travel demand model projections, the City would need to implement more aggressive measures to reach the Comprehensive Plan VMT reduction goal. The Seattle Transportation Plan sets out a long term vision for investments in transit, bike and pedestrian facilities to reduce VMT by 37% in 2044 relative to the 2018 baseline. The Seattle Transportation Plan includes a set of representative actions to reduce VMT that can be found on page 1-121 of the STP. #111: Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. #112: Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. #113: Freight, HOV, and SOV vehicles share the same lanes on most City roadways so LOS is reported for all vehicle modes together. #114: **Section 3.10.3 Mitigation Measures** in the Final EIS list potential strategies the City may pursue to reduce SOV mode share. The Seattle Transportation Plan includes additional detail on potential investments throughout the city. #115: The sensitivity tests were applied to the lowest growth and highest growth alternatives to provide a bookend of results. The other alternatives would fall within the range presented. #116: The Final EIS includes an analysis of the vehicle capacity changes proposed in the adopted Seattle Transportation Plan using both the No Action Alternative and Preferred Alternative land use assumptions.
225-14	Suggested revisions and requests for additional analysis in Section 3.11 Public Services. Request Final EIS addresses the City's capacity to deal with extreme weather events, including but not limited to a major earthquake event. Suggest Exhibit 3.11-1 show only the number of sworn officers from 2017 to 2022 or revise later exhibits to provide data all the way back to 2012. Revise projected students based on the expected number of family size	Comments noted and forwarded to City decisions makers. **Earthquake and Emergency Servies:** Regarding fire and emergency services see Final EIS **Section 3.11**. Building codes and Emergency Response Plans address seismic hazards, and are proposed to be included in Earth & Water Quality mitigation measures. See Final EIS **Section 3.1.3**. **Police:** **Exhibit 3.11-14** is updated with crime statistics to the year 2023**.** **Schools:** See Final EIS pages 3.11-60 and 3.11-61. The estimates of students is conservatively high given the recent fluctuations in enrollment. The City updates its comprehensive plan every 10 years and coordinates regularly with the district, and the school

Number	Comment Summary	Response
	units to be created through all studied alternatives.	district projects student cohorts more frequently and plans can be adaptively managed.
225-15	Suggested references to review and include in Final EIS analysis as well as request to fix a broken link to the Market Rate Housing Needs and Supply Analysis.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. The City has fixed the broken link to the Market Rate Housing Needs and Supply Analysis.
225-16	Request to provide missing appendices or information. Add a draft future zoning land use table to Appendix G. Request to provide the missing information for both the Pedestrian Master Plan as well as the Bicycle Master Plan in Appendix H.	Appendices for the Draft and Final EIS were posted online at https://www.seattle.gov/opcd/one-seattle-plan/project-documents. **Appendix G** provides detailed tables for existing land use conditions as well as proposed updates to Seattle's Neighborhood Residential zones. Future land use and zoning are discussed under **Section 3.6**. The Pedestrian Master Plan and Bicycle Master Plan are available online at https://www.seattle.gov/transportation/document-library/citywide-plans/modal-plans.
226	**Grant, Suzanne**	
226-1	Support for Alternative 2 since it has the lowest potential for development-related impacts to vegetation including loss of tree canopy cover. Series of questions regarding tree canopy such as acreage available for planting trees, projected increase in stormwater runoff, etc.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See **Section 4.2.1.2** for responses to comments in Letter 95 and similar, concerning the potential impacts of the alternatives on tree canopy, including the temporal loss of the essential benefits provided by tree canopy cover. Also see **Section 4.2.1.2** for responses to comments in Letter 500 and similar, concerning implementation of and the effectiveness of the City's Tree Protection Ordinance. Recommendations for revisions to the text of the One Seattle Plan have been forwarded to City decision makers. See **Section 4.2.1.2**. Calculation of the projected increase in stormwater runoff and associated management costs are beyond the scope of this study and will depend on specific future development.
227	**Graves**	
227-1	Concerns and misleading statements in the Plan about adverse impacts on the environment, water quality, noise, air quality and GHG emissions, plants, and animals.	The finding of "No significant adverse impact" to water resources is based on code compliance of future development associated with the Plan Alternatives and the mitigation measures included in the Plan. Cumulative avoidance of more egregious impacts to water resources in the region is presented as a consideration, not a mitigation measure. See **Section 4.2.1.2** for responses to comment themes on the Tree Canopy Evaluation.
228	**Green**	
228-1	Disappointment with the Plan because it lacks vision of the future and awareness of the current state	Comments noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes

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	and future realities of housing in Seattle.	related to the One Seattle Plan will be forwarded to the decision makers.
229	**Griffin 1**	
229-1	Study industrial areas such as SoDo and InterBay for possibility of transforming these areas into mixed use walkable neighborhoods.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See also the City's Industrial and Maritime Strategy adopted in 2023.
230	**Griffin 2**	
230-1	Suggest creative ways to increase density and greenery simultaneously. As well as study developer incentives.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers.
231	**Griffin 3**	
231-1	Study taller buildings in neighborhood centers, urban centers and regional centers and options for unlimited building height in those areas. As well as significantly expanding neighborhood centers and study more than the 42 outlined in Alternative 5.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See **Section 4.2.1.3** regarding changes to zoning standards in centers and additional and/or expanded neighborhood centers.
232	**Griffin 4**	
232-1	Study bolder options to build more housing, such as 5 story apartment buildings city-wide, plan for 200,000 new homes, and 80 neighborhood centers.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. The Preferred Alternative studies growth of 120,000 housing units and includes 30 neighborhood centers. See **Section 4.2.1.3** regarding studied growth and additional and/or expanded neighborhood centers.
233	**Griffin 5**	
233-1	Study zoning for offices, housing, and retail throughout the city.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers.
234	**Griffin 6**	
234-1	Study Duwamish River to make it the crown jewel of the City, what would it take to restore native wetland along the entire river with walking tails for the public?	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers.

Number	Comment Summary	Response
235	Griffith, Jonah	
235-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
236	Griffith, Katy	
236-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
237	Gross	
237-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
238	Gwinn	
238-1	Same content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.

Individuals by Last Name (H – P)

Exhibit 4.2-6. Written Comments and Responses, 2024—Individuals (H – P)

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239	Hagerty	
239-1	Support for Alternative 5 and suggest studying the impacts and opportunities to parking minimums, additional neighborhood centers, expanded high-rise zoning, social housing, etc.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See **Section 4.2.1.3** regarding changes to zoning standards in centers, additional and/or expanded neighborhood centers, and parking minimums.
240	Haines	
240-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
241	Hammarlund 1	
241-1	The City owns 40 feet of right-of-way on Roosevelt Way from 3rd to Aurora Ave, sidewalk connectivity could be increased by adding bike lanes and pedestrian lanes on the shoulders of this roadway with ditches replaced by covered culverts.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers.
242	Hammarlund 2	
242-1	Support for Alternative 5 because it encourages the development of additional low-income housing and	Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives

Number	Comment Summary	Response
	lowers the carbon footprint of residents. Support for Haller Lake United Methodist Church subdivision, and revision of Draft EIS to include NC-55 zoning for the church property.	so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers.
243	**Hance**	
243-1	Concern for loss of tree canopy. Appalled at the many houses being built in Seattle without leaving any room for trees.	See **Section 4.2.1.2** regarding tree canopy.
244	**Hannah**	
244-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
245	**Harper**	
245-1	Same content as Letter 226, regarding tree canopy concerns and questions.	See Response to Comment 226-1.
246	**Havkins**	
246-1	Has the Thornton Creek Watershed been considered in these growth plans? It is very close to 130th and 145th street.	EIS **Section 3.1** considers impacts of development on Thornton Creek, including in the 130th/145th Station Area.
246-2	Range of concerns and questions from safety, landscape and parks maintenance. Such as are there adequate safeguards for bike storage for commuters? How will trails be kept safe from homeless encampments.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers.
247	**Hedlund**	
247-1	The city did not listen to the overwhelming majority's call for an Alternative 6, which would enable the creation of more walkable neighborhoods. The plan should add many more neighborhood centers.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See **Section 4.2.1.3** regarding changes to zoning standards in centers and additional and/or expanded neighborhood centers.
248	**Heerwagen**	
248-1	Study the impacts of additional neighborhood centers off of arterials. Supports Alternative 5.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required Desired policy changes related to the One Seattle Plan will be forwarded to the decision

Number	Comment Summary	Response
		makers. See **Section 4.2.1.3** regarding additional and/or expanded neighborhood centers.
249	**Hill**	
249-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
250	**Hiltbrunner**	
250-1	Is there broadband capacity to accommodate equitable internet access for all residents, but also ensure 150/150 broadband speeds for all, per the RCW 43.330.536 state-level goal definitions?	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers.
251	**Holland**	
251-1	Rework the Comp Plan to expand housing capacity across the city and not just in isolated pockets and along car-chocked arterials.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers.
252	**Horn**	
252-1	Require developers to retain big trees as much as possible. Require designs to incorporate existing trees.	See **Section 4.2.1.2** for responses to comment themes on the Tree Canopy Evaluation.
253	**Howe**	
253-1	Consider Alternative 2 and 4. Same content as Letter 83, regarding plants, animals, and tree canopy.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See also **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.
254	**Hranac**	
254-1	Similar content as Letter 83 regarding plants, animals, and tree canopy with additional personal locational context and impact.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.
255	**Hutchins**	
255-1	Benefits of building a denser city outweigh the temporary impacts during development. Advocate for taller buildings in growth areas, zoning for mass timber, zoning for more than townhomes, reward	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See also **Section 4.2.1.3** regarding studied growth, changes to zoning standards in centers, additional and/or

Number	Comment Summary	Response
	extra units, do not count ADUs when counting density, resist urge to expand MHA, remove parking mandates, etc.	expanded neighborhood centers, capacity near parks, and parking minimums.
256	**Irwin**	
256-1	Support Alternative 2, best choice for giving growth while keeping climate impact considerations a high priority.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers.
257	**Itano**	
257-1	The plan is written with too much legalese; I cannot understand if the Plan protects our trees. Concern that beloved trees are being replaced by 60 plus apartment buildings that have no parking.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See **Section 4.2.1.2** for response regarding tree canopy.
258	**Janzen**	
258-1	List of questions and concern for tree canopy loss including but not limited to estimation of potential canopy acreage loss, feasibility to reach citywide goal, and suggested recommendations to mitigate tree canopy loss.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See **Section 4.2.1.2** for responses regarding tree canopy.
259	**Jarvis**	
259-1	Support all of Haller Lake from the line of Meridian to I-5 to be upzoned like Shoreline.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers.
260	**Jaureguy**	
260-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for Response to Letter 95 and similar regarding tree canopy.
261	**Jeannette**	
261-1	Support Alternative 5, we need more housing for Seattle's future. However, what is proposed might not even go far enough, if the proposal only meets today's needs then we will still have a problem in the future.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See also **Section 4.2.1.3** regarding studied growth.

Number	Comment Summary	Response
262	**Jeniker**	
262-1	Same content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.
263	**Jerome**	
263-1	Amend the Comp Plan to increase housing. Something closer to the previous "housing abundance map" would be a great start.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. See also **Section 4.2.1.3** regarding studied growth and additional and/or expanded neighborhood centers.
264	**Johnson, Carla**	
264-1	Same content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.
265	**Johnson, Iskra 1**	
265-1	What provisions are in Draft Plan to help reach the 30% tree canopy goal by 2037.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding tree canopy.
266	**Johnson, Iskra 2**	
266-1	According to King County's Urban Growth Capacity Report, King County already has capacity for 400,000 more housing units. Why is this data being disregarded in estimates?	Seattle's housing affordability crisis is due in large part to an undersupply of housing compared to demand. The action alternatives proposed in the EIS are each designed to support a different growth strategy for supporting and encouraging increased housing production and increased housing choice in Seattle.
266-2	Given current tree code, what calculations has the EIS done to predict the future of tree canopy under the Draft Plan's additional density. Questions about the effect of the Plan on plants, animals, stream, and watershed health.	See **Section 4.2.1.2** for responses to comments in Letter 95 and similar, concerning the analysis methodology for the evaluations of the alternatives in this programmatic, non-project EIS. Also see the response to Comment 2-7 concerning the feasibility of retaining trees on lots undergoing development or redevelopment. See **Section 4.2.1.2** for Responses to Letter 500 and similar, concerning implementation of and the effectiveness of the City's Tree Protection Ordinance. The impacts of the alternatives on plants and animals (terrestrial and aquatic species), as well as impacts related to heat islands, are described and evaluated in **Section 3.3.2** of the EIS.
266-3	Questions and concerns about city's sewer capacity to handle storm overflow in the new climate of extreme rainfall with added density and hardscaping.	Final EIS **Section 3.12** discusses impacts to utilities under each of the alternatives. This includes an analysis of impacts to wastewater and stormwater services, including potential impacts from climate change on utility infrastructure. Impacts of the alternatives relating to stormwater and flooding are described and evaluated in **Section 3.1.2** of the EIS.
266-4	Concerns around mitigating damages from loss of stormwater	Measures for mitigating for impacts of the alternatives relating to stormwater management are discussed in **Section 3.1.3** of the EIS.

Number	Comment Summary	Response
	management functions provided by trees.	
266-5	Has the Draft EIS verified the assumptions that 100,000 new units of housing will trickle down to create greater affordability? Additional questions around affordability and gentrification.	See response to Comment 44-2. See also **Section 4.2.1.1** regarding the affordable housing evaluation.
267	**Johnston**	
267-1	Same content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.
268	**Jones, Judi**	
268-1	Same content as Letter 95 regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
269	**Jones, Mary**	
269-1	Same content as Letter 95 regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
270	**Joseph**	
270-1	Similar content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.
271	**K R**	
271-1	Questions around housing, request to provide evidence for supply-side trickle-down theory. Request to include definition of "affordability," require developments to build sidewalks, implement impact fees or commensurate public benefit compensation for investors in NC Commercial zone properties.	**Housing supply and affordability:** See response to Comment 44-2. **Definition of "affordability":** See response to Comment 44-1. See also **Section 4.2.1.1** regarding the affordable housing evaluation. **Public benefit:** The alternatives do not include any changes to city policies regarding impact fees or commensurate public benefits.
271-2	Against the upzone of residential blocks between 85th and 80th near Greenwood Ave.	Comment noted. This comment is beyond the scope of environmental review of the One Seattle Plan so no response is necessary. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers.
272	**Kaldowski**	
272-1	The City did not listen to the overwhelming call for an Alternative 6 vision, which would encourage social housing in all neighborhoods. The plan should add many more neighborhood centers.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See **Section 4.2.1.3** regarding studied growth and additional and/or expanded neighborhood centers.

Number	Comment Summary	Response
273	**Keefe**	
273-1	The Comp Plan poorly documents that plants and animals will not be affected by planned building scenarios. Preservation of urban forest lands and parks must be a high priority. New plantings will not compensate for those removed for development, since it takes years for new trees to equal the sequestering ability of mature trees.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.
274	**Keller, Sophia**	
274-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
275	**Keller, Kathryn**	
275-1	Concerns on growth in the Central Area.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers.
275-2	Section 3.1 Earth & Water needs to have more information about the specific land slide prone areas and water and flood threats with the building we have already in those places.	The EIS includes a summary of existing conditions for reference, but all EIS impact analysis is conducted by evaluating the proposed land use alternatives. Evaluation of existing threats to earth and water resources is outside of the scope of this programmatic EIS, which focuses on how the proposed land use alternatives might change things in the future as compared to the no action alternative. Also, note that current development in and around critical areas (like landslide and flood prone areas) must comply with City codes that require specific protections to avoid or minimize impacts to those areas.
275-3	Section 3.6 Land Use should reflect more anti-displacement measures.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. Residential and commercial displacement are discussed comprehensively in Final EIS **Section 3.8 Population, Housing, & Employment**.
275-4	Saving trees elsewhere or any other grand scheme is not a reason for Seattle to take action that contradicts the basic concurrency factors we have decided matter for a healthy life.	See **Section 4.2.1.2** regarding tree canopy.
276	**Kelly, Peter**	
276-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.

Number	Comment Summary	Response
277	**Kelly, Shana**	
277-1	Similar content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.
278	**Kerkof**	
278-1	Similar content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.
279	**Kidder**	
279-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
280	**Kimball**	
280-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
281	**King**	
281-1	Alternative 2 and 4 are less harmful than 3 and 5. Concern about cutting down big trees that help mitigate climate change, and concern for Seattle's short and long range livability as climate change continues to impact our region.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See **Section 4.2.1.2** regarding tree canopy.
282	**Kirchoff**	
282-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
283	**Kirk**	
283-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
284	**Kirschner**	
284-1	Concerns on disproportionate impacts from major freight routes, busy arterials, and sources of industrial pollution on BIPOC communities.	The Final EIS acknowledges that housing policy and zoning laws have a history of causing harm to Black, Indigenous, and People of Color in Seattle—Final EIS **Section 3.6.2** evaluates land use patterns proposed under each alternative and potential resulting compatibility conflicts for their likelihood to intensify or lessen these historical inequities. Final EIS **Section 3.10** considers race and social justice in relation to access to comfortable/connected transportation facilities and transportation options. EIS **Section 3.2.2** and **Section 3.5.2** consider air quality and noise impacts, respectively, including exposure to air and noise pollution. See also Response to Comment 5-3.

Number	Comment Summary	Response
285	**Kitchen**	
285-1	Support for original abundance map and support an Alternative 6. The plan should add many more neighborhood centers.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See **Section 4.2.1.3** regarding studied growth and additional and/or expanded neighborhood centers.
286	**Klein**	
286-1	Support for Alternative 5. Suggest studying the impact of corner stores.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers.
287	**Knoblet**	
287-1	Concern for tree canopy, please consider all the critters that are displaced by cutting down trees.	See **Section 4.2.1.2** regarding plants, animals, and tree canopy.
288	**Kordick**	
288-1	Similar content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.
288-2	Do not support the neighborhood center planned for Roosevelt Ave NE and NE 90th in Maple Leaf, as it will destroy a large section of an established neighborhood.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers.
289	**Kramer**	
289-1	Support for the Housing Abundance Map for the Comp Plan, we desperately need more housing.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See **Section 4.2.1.3** regarding studied growth.
290	**Kuczmarski**	
290-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
291	**Lafferty**	
291-1	Similar content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.

Number	Comment Summary	Response
292	**Lange**	
292-1	Same content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.
293	**Langhans 1**	
293-1	Question around building DADU's on steep hills, how to build on narrow lots to maximize coverage and profits.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers.
293-2	Questions and concerns around issue of light pollution and impact of surrounding taller buildings on solar panels.	Under all alternatives the City allows heights taller than existing structures throughout the city to achieve housing and other goals. Three-story buildings are already allowed in Neighborhood Residential zones, which could cast shadows on existing 1-2 story structures. The analysis acknowledges that shadows may fall on existing solar panels but that as a citywide analysis, it cannot address this impact at the project scale. The City zoning standards address structure height and adjacent solar access in various zones such as Downtown, Lowrise, and Seattle Mixed. Seattle Municipal Code requires lighting techniques to avoid light on neighboring properties and minimize impacts to the night sky (e.g., SMC 23.44.008.H), and projects that trigger SEPA analysis are required to consider light and glare impacts. Concerns about loss of green spaces and affordable family-sized units are noted. The EIS addresses the provision of public parks and open spaces in **Section 3.11**. The City POS addresses demand for parks in proximity to multifamily units. See **Section 4.2.1.3**.
293-3	Concerns around safety issues of corner stores.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers.
293-4	Questions and suggestions about fence regulations and encouraging gardens and yards.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers.
293-5	Suggestion to wait until the results of the Pilot Program and its 35 projects to influence the Draft Plan.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. The City is required to update its Comprehensive Plan and development regulations to meet state deadlines under the GMA.

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294	**Langhans 2**	
294-1	Questions about how to increase housing units. Request for definition of affordability that is used in the Draft EIS. Question on whether the City's new zone maps will be revised independently of any outside influence of developers.	The term "affordable" refers to housing that costs less than 30% of the occupant's household income. This definition is in the EIS. The City is updating the zoning map consistent with changes needed to support growth targets. See also Response to Comment 44-1 and **Section 4.2.1.1**.
294-2	How will the city encourage a variety of home configurations such as cottage housing?	The Preferred Alternative supports a variety of housing types (including cottage housing and other middle housing consistent with HB 1110) that will support housing affordable to all economic segments of the population in Seattle. See also **Section 4.2.1.1** regarding the affordable housing evaluation.
294-3	Why the City is considering removal of design standards and reviews.	The City is revising its zoning regulations consistent with new state law. This includes HB 1110 which restricts design review and development standards for middle housing.
294-4	Why does the City fail to discuss and formalize the transition zones as permanent, impenetrable boundaries that surround the higher density zoning of the urban center, etc.?	**Exhibit 3.6-9 through Exhibit 3.6-11** discuss regulations the City has in place to provide transitions between multifamily and commercial zones that abut Neighborhood Residential zones. Additionally, under the Preferred Alternative most Urban and neighborhood centers will use Lowrise zones as a transition between higher density zoning and Neighborhood Residential zones.
294-5	Why doesn't the City create general overlay zones to protect family neighborhoods, especially those that are established, already saturated with homes, and have their own distinct character and history? Suggested required steps for developers of new homes or major additions.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers.
294-6	Concerns and questions about strategies to create more housing units per lot, and impact to current residents of single-family homes.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. EIS **Section 3.8** considers residential displacement impacts of the alternatives. Individual property owners will continue to make choices about sale and/or redevelopment of their properties.
295	**Lappas**	
295-1	Same content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.

Number	Comment Summary	Response
296	**Lavigne**	
296-1	Support for Alternative 5. Study impacts of a range of things including higher growth targets, additional neighborhood centers in urban neighborhoods, including off of arterials, social housing in every neighborhood etc.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See **Section 4.2.1.3** regarding studied growth and additional and/or expanded neighborhood centers.
297	**Law**	
297-1	Similar content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.
298	**Lazerwitz 1**	
298-1	Increase housing capacity projects to match future demand, aim for 120,000 new units over the next 20 years. Increase the number of neighborhood centers to 50 and allow building 6+ stories near job centers, transit hubs, mixed-used nodes, schools, and parks. Allow for taller midrise housing in growth areas and raise FAR from 0.9 to 1.2 (or 1.5 near transit and in neighborhood centers). Affordability is a major concern to all of us. Create significant floor area, height, and density bonuses for affordable and social housing and include tax rebate program for developers as an alternative to MHA. Include the OPCD proposed anti-displacement strategies in the Comp Plan. Remove parking requirements for housing on Neighborhood Residential lots.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See also **Section 4.2.1.3** regarding studied growth, changes to zoning standards in centers, additional and/or expanded neighborhood centers, and parking minimums and **Section 4.2.1.1** regarding the affordable housing evaluation.
299	**Lazerwitz 2**	
299-1	Similar content as Letter 298 with support for Alternative 5 and reiteration of suggested revisions at the end of the letter.	See Response to Comment 298-1.
300	**Lazerwitz 3**	
300-1	Similar content as Letter 298 with support for Alternative 5 and reiteration of suggested revisions at the end of the letter. The City did not listen to the overwhelming	See Response to Comment 298-1.

Number	Comment Summary	Response
	majority call for an Alternative 6 vision. In Roosevelt, the Plan should include ideas that support HB1220 for affordable housing.	
301	**Lebegue**	
301-1	Summarize the Climate and Sustainability value and request that the City and the state close the chapter on Blue Angels at Seafair. PM2.5 particles, greenhouse gases, and jet noise is not good for us.	Comments noted and forwarded to City decisions makers. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers.
302	**Leconte**	
302-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
303	**Lee**	
303-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
304	**Leonard**	
304-1	Concerns about growth and its effect on trees and wildlife habitat.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See also **Section 4.2.1.2** regarding tree canopy.
305	**Leshner**	
305-1	Similar content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.
306	**LeVine**	
306-1	Alternative 2 will be the least destructive to Seattle's exceptional tree canopy, our vegetation and the urban wildlife. Suggestions to mitigate measures to retain mature trees include but not limited to amending the tree protection ordinance to retain existing trees 6" DSH and larger, support building higher and building attached units to allow for tree retention and planting areas, remove basic tree protection area loophole.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See **Section 4.2.1.2** regarding tree canopy, including responses to comments in Letter 500 and similar, concerning implementation of and the effectiveness of the City's Tree Protection Ordinance.

Number	Comment Summary	Response
307	**Lewis, Sarah**	
307-1	Same content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.
308	**Lewis, Christine**	
308-1	Keep Green Lake perimeter as it is. Development should occur along the arterials not neighborhood streets.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers.
309	**Lim**	
309-1	Disappointed that consideration is not currently being given to increase the FAR/coverage for smaller middle housing projects. We are behind and below the state and other municipalities adopted standards. Without these increases the units built will be smaller and disincentivize them from being built at all. Disagree on reduced zoning for South Seattle neighborhoods.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See **Section 4.2.1.3** regarding changes to zoning standards in centers.
310	**Limberg**	
310-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for Response to Letter 95 and similar regarding tree canopy.
311	**Lin**	
311-1	Consider range of effects on; solar panels, light, parking, traffic, public safety, tree canopy, mobility for people with wheelchairs or strollers, parks (including dog parks), neighborhood character, small businesses, public art, trash and graffiti.	**Parking**: While the City will continue to actively manage its on-street parking supply as well as consider whether changes to parking requirements are appropriate, parking is not a required element for SEPA documents and therefore is not explicitly studied in this EIS. **Traffic**: **Section 3.10** provides an evaluation of the transportation effects of the alternatives. This includes the following metrics: mode share, vehicle miles traveled, vehicle hours traveled, average trip speed, corridor level of service, vehicle volume to capacity at a variety of screenlines, intersection level of service in the NE 130th/NE 145th Street Subarea, and performance on state facilities. **Mobility for people with wheelchairs or strollers**: **Section 3.10** provides a summary of current conditions for people walking, biking, and rolling and an evaluation about how those conditions would change with each of the EIS alternatives. Because this is a programmatic EIS, the evaluation is done at a high level across the city. Detailed evaluation of effects to non-motorized facilities from specific developments would occur through the City's project review process.

Number	Comment Summary	Response
312	**Little**	
312-1	Support for Alternative 5. Haller Lake United Methodist Church is considering development of low income housing and would like to include retail space for a more accessible and appealing neighborhood.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers.
313	**Loder**	
313-1	Skeptical that there will be no overall effect on our area waterways, can our system really handle 200,000 more users? Moderate tree canopy loss is not acceptable.	The potential impacts of the alternatives on utilities, including wastewater infrastructure, are described and evaluated in **Section 3.12** of the EIS; see **Section 3.1** of the EIS for additional analysis relating to stormwater management. See also **Section 4.2.1.2** regarding tree canopy.
313-2	Glad to see renter displacement acknowledged. How much empty/available land is there that could be added to the park system? There is no mitigation for the impact of more cars on our streets. How are we ensuring pedestrian safety?	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. The City updated its Parks LOS as part of a 2024 update to the POS Plan to make it more consistent with the City's goals and approach to acquisition. The 2024 POS Plan Update proposes to change the LOS from an acres per 1,000 people standard to providing parks and park facilities within a 10-minute walk. See the POS Plan Update for measures to enhance the park system. The EIS provides an evaluation of the transportation effects of the alternatives (**Section 3.10.2 Impacts**) as well as mitigation for the impacts that are identified (**Section 3.10.3 Mitigation Measures**).
314	**Loeber**	
314-1	Similar content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.
315	**Lorey 1**	
315-1	The City did not listen to the overwhelming majority's call for an Alternative 6 vision, which would lower the cost of housing. Plan needs to address HB 1110, requirements, use Commerce's model middle housing ordinance as a minimum standard, add back additional neighborhood centers, increase capacity in the grids between high traffic corridors (instead of along these corridors), and eliminate parking minimums citywide.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See **Section 4.2.1.3** regarding studied growth, changes to zoning standards in centers, additional and/or expanded neighborhood centers, capacity near parks and other amenities, and parking minimums.

Number	Comment Summary	Response
316	**Lorey 2**	
316-1	Support bringing the Comp Plan back in line with the original map OPCD drafted. This proposal ensures we can meet our expected housing demand and prepare for unexpected future increases in housing demand.	Comments noted and forwarded to City decision makers. See **Section 4.2.1.3** regarding studied growth.
317	**Lowhim 1**	
317-1	Increase the housing in Seattle.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers.
318	**Lowhim 2**	
318-1	Support a dense built up village on 17th and Cherry.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers.
319	**Ludman**	
319-1	Support Alternative 2; include suggestions to mitigate tree canopy loss similar to Letter 306 as well as suggesting to require developers to submit a tree inventory.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See **Section 4.2.1.2** regarding tree canopy, including responses to comments in Letter 500 and similar, concerning implementation of and the effectiveness of the City's Tree Protection Ordinance.
320	**Lukose**	
320-1	Same content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for Response to Letter 83 and similar regarding plants, animals, and tree canopy.
321	**Lund**	
321-1	Similar content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for Response to Letter 83 and similar regarding plants, animals, and tree canopy.
322	**Luxem**	
322-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for Response to Letter 95 and similar regarding tree canopy.
323	**Lyris**	
323-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for Response to Letter 95 and similar regarding tree canopy.

Number	Comment Summary	Response
324	**Martin**	
324-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for Response to Letter 95 and similar regarding tree canopy.
325	**Mashayekh**	
325-1	Similar content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for Response to Letter 83 and similar regarding plants, animals, and tree canopy.
326	**Maslan**	
326-1	Similar content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for Response to Letter 95 and similar regarding tree canopy.
327	**Mattione**	
327-1	Similar content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for Response to Letter 83 and similar regarding plants, animals, and tree canopy.
328	**Mauel**	
328-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for Response to Letter 95 and similar regarding tree canopy.
329	**McCormick**	
329-1	Similar content as Letter 83 regarding plants, animals, and tree canopy with additional detailed questions.	See **Section 4.2.1.2** for Response to Letter 83 and similar regarding plants, animals, and tree canopy. Analyses in **Section 3.3.2** of the EIS describe and evaluate the potential impacts of the alternatives on plants and animals in the city, including species associated with mature forest habitat. Also see **Section 4.2.1.2** for responses to comments in Letter 500 and similar, concerning implementation of and the effectiveness of the City's Tree Protection Ordinance.
329-2	Same suggestions to mitigate tree canopy loss as Letter 306.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See **Section 4.2.1.2** regarding tree canopy.
330	**McCue**	
330-1	Impact of higher growth targets should be studied as an Alternative 6. Alternative 5 is most preferable of current proposals, but more growth appears necessary to comply with state law.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See **Section 4.2.1.3** regarding studied growth.
331	**McDonald**	
331-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for Response to Letter 95 and similar regarding tree canopy.

Number	Comment Summary	Response
332	**McEwuen**	
332-1	Support for Alternative 5 for addressing the city's severe housing shortage, but much more can be done to encourage housing production. List of supported strategies including but not limited to maximize development capacity and remove or reduce zoning barriers in target growth areas, regional center in southeast Seattle, residential uses in manufacturing industrial centers, etc. Do not support additional impact fees or an increase in MHA fees.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See **Section 4.2.1.3** regarding studied growth and **Section 4.2.1.1** regarding the affordable housing evaluation.
333	**McKiernan**	
333-1	Similar content as Letter 83 regarding plants, animals, and tree canopy with the same additional detailed questions as Letter 329-1.	See **Section 4.2.1.2** for Response to Letter 83 and similar regarding plants, animals, and tree canopy. Also see **Section 4.2.1.2** for Responses to Letter 500 and similar, concerning implementation of and the effectiveness of the City's Tree Protection Ordinance.
333-2	Same suggestions to mitigate tree canopy loss as Letter 306.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See **Section 4.2.1.2** regarding tree canopy.
334	**Michalski**	
334-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for Response to Letter 95 and similar regarding tree canopy.
335	**Miller, Anne**	
335-1	Support Alternative 2, due to lowest potential for development related impacts to vegetation. Same suggestions to mitigate tree canopy loss as Letter 306.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See **Section 4.2.1.2** regarding plants, animals, and tree canopy.
336	**Miller, Bonnie**	
337-1	Concerns and questions around natural urban environment, and loss of tree canopy.	See **Section 4.2.1.2** for Responses to Letter 500 and similar, concerning implementation of and the effectiveness of the City's Tree Protection Ordinance.
337	**Miller, Cameron Sidney**	
337-1	The city did not listen to overwhelming majority's call for an Alternative 6 vision. Zoning and FAR regulations should be changed	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision

Number	Comment Summary	Response
	to not just allow but encourage stacked-flat, 6-plexes across the board, at minimum 8-12-plexes in most places.	makers. See **Section 4.2.1.3** regarding studied growth and changes to zoning standards in centers.
338	**Miller-Dowell Amy**	
338-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for Response to Letter 95 and similar regarding tree canopy.
339	**Mireia**	
339-1	Same content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for Response to Letter 83 and similar regarding plants, animals, and tree canopy.
340	**Moehring 1**	
340-1	With the forthcoming light rail stops along Interbay between Smith Cove and Dravus/Nickerson, the Interbay Neighborhood Center designation is regrettably undersized and undervalued to its potential mixed use commercial and mid-rise residential given the 2040 transit capacity, proximity to City Center, and jobs.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers.
341	**Moehring 2**	
341-1	Support Alternative 2 and 4. Similar content as Letter 83, regarding tree canopy, and impact to plant and animals.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See **Section 4.2.1.2** for Response to Letter 83 and similar regarding plants, animals, and tree canopy.
342	**Morgan 1**	
342-1	Concerns around sprawl. What measures does this plan anticipate to actually deter development in outlying areas of the region other than allowing it in the city?	State, regional, and local policies and objectives make clear that the long-term sustainability of rural and resource lands is dependent on accommodating development within the designated urban growth area (e.g., the GMA, VISION 2050, and King County CPPs). Each studied alternative encourages development in Seattle (an urban environment)—focused in designated centers and near transit stations—to reduce the inappropriate conversion of undeveloped land into sprawling, low-density development. The Preferred Alternative provides for more growth and could add capacity to meet additional state and regional objectives, including improved balance of jobs and housing, creating opportunities for middle housing, focusing more growth around transit investments, and contributing to a pattern of growth that supports regional climate goals.
342-2	Concerns around impact to plants and animals. Disagreement with	See **Section 4.2.1.2** regarding plants, animals, and tree canopy.

Number	Comment Summary	Response
	stated impacts and mitigation measures to plants and animals, and concern for loss of tree canopy.	
342-3	Concern around land use patterns, inconsistencies in development scale and density by permitting 4 - story development and near full lot development in Neighborhood Residential zones. No buffer proposed between Neighborhood Residential zones in neighborhood centers where zoning allowing 7-story developments, particularly where large-scale development along frequent transit arterials is to be extended one-block into adjacent Neighborhood Residential zones	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. New place types and/or expanded housing options in existing Neighborhood Residential zones proposed as part of the action alternatives would introduce localized land use and urban form impacts where newer development is of greater height and intensity than existing development. Over time, additional growth and development will occur in Seattle and a generalized increase in development intensity, height, bulk, and scale is expected under all alternatives—this gradual conversion of lower-intensity uses to higher-intensity development patterns is unavoidable but an expected characteristic of urban population and employment growth. Under the Preferred Alternative, Neighborhood Residential zones allow four-story buildings only if 50% of the units are affordable and the site is within a quarter-mile of frequent transit. Otherwise, three-story buildings are allowed. Also see Response to Comment 294-4 regarding transitions between multifamily and commercial zones that abut Neighborhood Residential zones. Overall, the new place types would create smoother and more varied transitions in intensity throughout the city (especially adjacent to urban center and village boundaries).
342-4	The decision to establish neighborhood centers prior to localized analysis of pedestrian and transportation conditions will lead to unanticipated significant adverse transportation impacts.	Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. The STP EIS addresses the effect of different investments on land use alternatives similar to Alternative 5 which includes the concept of neighborhood centers. This Final EIS evaluates the Preferred Alternative and the potential transportation improvements associated with the Comprehensive Plan within the 20-year planning period within the 20-year planning period based on both the STP plan.
343	**Morgan 2**	
343-1	Same content as Letter 342-1 from points 1-3.	See Response to Comments 342-1 and 342-2.
344	**Morgan 3**	
344-1	Same content as Letter 342-2 from points 4-5.	See Response to Comments 342-3 and 342-4.
345	**Morrow**	
345-1	Same content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.

Number	Comment Summary	Response
346	**Muir 1**	
346-1	Inaccurate statement regarding tree loss. Tree canopy loss on lots undergoing development should look at loss on all projects finished in 2016-2020.	See Response to Comment 20-6 and **Section 4.2.1.2**. The City has evaluated the alternatives with regard to the recently amended 2023 Tree Code amendments.
347	**Muir 2**	
347-1	As tree canopy is currently measured, the area does not include analysis of tree canopy volume. Without taking both measurements of area and volume into consideration, we cannot calculate ecological loss when mature trees are removed.	Analyses in the EIS are consistent with SEPA requirements for programmatic, non-project reviews, per WAC 197-11-442. The analyses in the EIS have been expanded to address the potential for temporal loss (i.e., time lag between the loss of functions provided by removed trees and the replacement those functions by planted trees) of the essential benefits provided by tree canopy cover. Also see **Section 4.2.1.2** for responses to comments in Letter 500 and similar, concerning implementation of and the effectiveness of the City's Tree Protection Ordinance.
348	**Muller**	
348-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
349	**Neylan**	
349-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
350	**Nicol**	
350-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for Response to Letter 95 and similar regarding tree canopy.
351	**Nims**	
351-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for Response to Letter 95 and similar regarding tree canopy.
352	**Niven**	
352-1	Support Alternative 2 and 4. Similar content as Letter 83, regarding tree canopy, and impact to plant and animals.	See **Section 4.2.1.2** for Response to Letter 83 and similar regarding plants, animals, and tree canopy.
353	**Niznik**	
353-1	Concerns about the loss of trees and wildlife habitat, especially near the 130th Street Station. Support Alternative 1 which will result in less destruction of neighborhoods and green space. Questions around the tree canopy and same suggestions to mitigate tree canopy loss as Letter 306.	Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See **Section 4.2.1.2** regarding tree canopy.

Number	Comment Summary	Response
354	**Nordstrom**	
354-1	Update the Plan to be bolder around housing capacity and growth. Consider expanding urban centers near transit and adding additional neighborhood centers, allow corner stores in more places, and more types of middle housing in Neighborhood Residential zones. Give substantial bonuses in FAR, height, etc. for affordable housing provision.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See also **Section 4.2.1.3** regarding studied growth, changes to zoning standards in centers, and corners stores and **Section 4.2.1.1** regarding the affordable housing evaluation.
355	**O, Pennie**	
355-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for Response to Letter 95 and similar regarding tree canopy.
356	**O'Steen**	
356-1	Similar content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for Response to Letter 83 and similar regarding plants, animals, and tree canopy.
357	**Obray**	
357-1	Same content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for Response to Letter 83 and similar regarding plants, animals, and tree canopy.
358	**Okamoto**	
358-1	Support Alternative 2, must sustain a healthy ecosystem that promotes well-being, resilience, clear air, tree canopy, and sustainability equitably across all neighborhoods.	Comments noted and forwarded to City decision makers. See also **Section 4.2.1.2** tree canopy.
359	**Olson**	
359-1	Same content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for Response to Letter 83 and similar regarding plants, animals, and tree canopy.
360	**Olwell**	
360-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for Response to Letter 95 and similar regarding tree canopy.
361	**Ortega**	
361-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for Response to Letter 95 and similar regarding tree canopy.
362	**Ortiz**	
362-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for Response to Letter 95 and similar regarding tree canopy.

Number	Comment Summary	Response
363	**Ostrer**	
363-1	Same content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for Response to Letter 83 and similar regarding plants, animals, and tree canopy.
364	**Overgaard**	
364-1	Similar content as Letter 83, regarding tree canopy, and impact to plant and animals. Support for Alternative 2 or 4.	Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See **Section 4.2.1.2** for Response to Letter 83 and similar regarding plants, animals, and tree canopy.
364-2	Reduce proposed expansion area of Upper Queen Anne by 50%. Do not think this street network will be able to support the added traffic and parking requirements that will be generated by the level of proposed development.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See also **Section 4.2.1.3**.
365	**Oxman**	
365-1	Include the tree canopy goals of 30% working goal, and 40% aspirational goal to be accomplished by 2037. Add language that equity will only be achieved by allocating greater funding of maintenance in underserved locations.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See **Section 4.2.1.2** for Response to Letter 83 and similar regarding plants, animals, and tree canopy.
366	**Pan**	
366-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
367	**Paul**	
367-1	Study impacts of floor area ratio bonuses that incentivize stacked flat development rather than attached or detached townhomes. Of the proposed options prefer Alternative 5 but prefer that City look at higher growth targets than Alternative 5.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See **Section 4.2.1.3** regarding studied growth and changes to zoning standards in centers.
368	**Pearson**	
368-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
369	**Pedroso**	
369-1	Concern about the vagueness of the Draft EIS when it comes to our urban vegetation and wildlife.	See **Section 4.2.1.2** regarding plants and animals.

Number	Comment Summary	Response
	Provide more information on impact to plants and animals.	
369-2	Hard time believing the Draft EIS actually stated that this would minimize development in rural areas. Please back up assertions.	See Response to Comment 342-1.
370	**Pelland**	
370-1	Recommend minimum changes to improve the Plan including support missing middle housing, include provisions for transit-oriented development, eliminate parking requirements.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See also **Section 4.2.1.3** regarding changes to zoning standards in centers and parking minimums and **Section 4.2.1.1** regarding the affordable housing evaluation.
371	**Pellkofer**	
371-1	Same content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.
372	**Penrose**	
372-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for Response to Letter 95 and similar regarding tree canopy.
373	**Peterson**	
373-1	Concern on North 148th Street station placement. Allow higher density apartment buildings in the neighborhood between North 130th and North 135th streets and suggested mitigation options. Additional concern on tree canopy loss. Suggestion to add green space, such as pocket parks.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See **Section 4.2.1.2** regarding tree canopy. See also **Section 3.11 Public Services** which includes an evaluation of parks including under the City's recently amended Parks, Recreation, and Open Space Plan.
374	**Pifer**	
374-1	Same content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for Response to Comment 83 and similar regarding plants, animals, and tree canopy.
375	**Pike 1**	
375-1	The City did not listen to the overwhelming majority's call for an Alternative 6. The plan should eliminate parking minimums, convert underutilized golf courses into free public parks and affordable housing, and allow taller	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See also **Section 4.2.1.3** regarding studied growth, changes to zoning standards in centers, capacity near parks, and parking minimums.

Number	Comment Summary	Response
	and bigger buildings in more neighborhoods.	
376	**Pike 2**	
376-1	The plan should be more ambitious in upzoning to increase density. Revise to allow bigger buildings, restore all 42 originally proposed neighborhood centers, match or exceed the state floor area minimums and allow more density housing, etc.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. The Preferred Alternative studies growth of 120,000 housing units and includes 30 neighborhood centers. See also **Section 4.2.1.3** regarding studied growth, changes to zoning standards in centers, additional and/or expanded neighborhood centers, corner stores, and parking minimums.
377	**Pike 3**	
377-1	Disappointed that Mayor's office disregarded call for a much bolder growth strategy. Residents want to see bold change – more dense housing, more housing around transit corridors, more corner stores in neighborhoods. The plan does not accommodate the number of new residents projected to arrive.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. The Preferred Alternative studies growth of 120,000 housing units. See also **Section 4.2.1.3**regarding studied growth and **Section 4.2.1.1** regarding the affordable housing evaluation.
378	**Placido**	
378-1	Regarding the 130th and 145th Station area, support for Combined (Alternative 5) or Focused (Alternative 2). As a resident, we expect big, lasting changes that coincide and take advantage of the improvements happening on Aurora.	Comment noted. This comment is beyond the scope of environmental review of the One Seattle Plan so no response is necessary. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers.
379	**Pope 1**	
379-1	Increase greening our communities not depleting these resources. Concern that in your haste to develop, you are ignoring studies from the largest urban centers in the world that prioritize increasing green spaces as a way to enhance environmental and ecological benefits. Suggest clarity around specific tree canopy statements.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See **Section 4.2.1.2** for responses to comments in Letter 83 and similar regarding concerns about the effectiveness of tree planting programs.
380	**Pope 2**	
380-1	Specify who is addressing (which departments or committees) day-to-day decisions regarding	See **Section 4.2.1.2** for responses to comments in Letter 500 and similar regarding concerns about the effectiveness of City's Tree Protection Ordinance. Also see **Section 4.2.1.2** for responses to

Number	Comment Summary	Response
	preserving existing green spaces in all zones. Request specific studies that show planning programs can compensate for loss of larger trees; what oversight will be in place going forward to ensure scientist will lead the SDCI decisions in the approach to tree preservation.	comments in Letter 83 and similar regarding concerns about the effectiveness of tree planting programs. See also **Section 3.11** for an evaluation of demand for parks under each alternative, and **Section 4.2.1.3** regarding the City's POS and providing parks in proximity to areas of growth. See also Response to Comment 188-1 regarding the City's approach to street trees.
381	**Price**	
381-1	Similar content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.

Individuals by Last Name (Q – Z)

Exhibit 4.2-7. Written Comments and Responses, 2024—Individuals (Q – Z)

Number	Comment Summary	Response
382	**Quarre**	
382-1	Add policy regarding restoring ecological conditions.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers.
382-2	Be inclusive of neighbors as part of "community partners" who collaborate on Shoreline Street Ends.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers.
383	**Radmanovic**	
383-1	Concern by the proposal to rezone West Green Lake neighborhood to allow up to 3-6 story buildings. Please use C1-55 (M) zoned area along Aurora in West Green Lake for building affordable housing instead of rezoning.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers.
384	**Rai Trapero**	
384-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
385	**Ramsdell**	
385-1	Support managed growth to add housing in the 130th Station Rezone. Support focused growth between I-5 and Aurora along 130th that will enhance safe walking. Focus on	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers.

Number	Comment Summary	Response
	transportation corridors as noted in Alternative 4. Add high-rise apartments around neighborhood amenities for elderly.	
385-2	Support Alternative 5 level of growth if developers are required to maintain a maximum percentage of healthy, long-living trees.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See also **Section 4.2.1.2** regarding tree canopy.
386	**Rava**	
386-1	Similar content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.
387	**Ravell, Padial**	
387-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
388	**Ravell, Mireia**	
388-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
389	**Reuben**	
389-1	The Draft Plan does not plan for enough housing, keeping housing production below expected growth. Includes six recommendations similar to Letter 128 to embrace housing abundance.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See **Section 4.2.1.3** regarding studied growth, changes to zoning standards in centers, additional and/or expanded neighborhood centers, corner stores, and parking minimums.
390	**Riley**	
390-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
391	**Robb**	
391-1	Similar content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.
392	**Roberts**	
392-1	Own home located next to the E. Harrison Street End on Lake Washington. Concern on deteriorating conditions on Shoreline Street Ends. Proposed revision to draft Policy P 1.14 and to the glossary definition of Shoreline Street Ends.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers.

Number	Comment Summary	Response
393	**Robinson**	
393-1	Property and business owner at 12303 15th Ave NE. Support for changing zoning in the 130th 145th Street Station Area, Alternative 2 and 5.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers.
394	**Rock**	
394-1	Bring back the planner proposed Abundance map that begins to meet the needs of our growing city instead of politically motivated opinions.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See **Section 4.2.1.3** regarding studied growth.
395	**Roda**	
395-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
396	**Root**	
396-1	Concerns and questions around tree canopy; is there a concrete plan to ensure that trees will be planted in a timely fashion? Supported analysis of what the impacts of trees and wildlife are expected to be.	See **Section 4.2.1.2** regarding plants, animals, and tree canopy.
397	**Roraback**	
397-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
398	**Rose**	
398-1	Support Alternative 2 or 4 for future housing plans as there is more possibility to maintain tree canopy. Maximize retention of existing trees 6" DSH and larger. What impacts will be on plants and animals in each alternative.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See **Section 4.2.1.2** regarding tree canopy.
399	**Rosentreter**	
399-1	Support OPCD Abundance Map and reject current plan that significantly reduced the amount of planned housing.	Comments noted and forwarded to City decision makers. See **Section 4.2.1.3** regarding studied growth.
400	**Rubenkonig**	
400-1	Same content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.

Number	Comment Summary	Response
401	**Ruha**	
401-1	Comment on energy efficient construction, tree canopy cover, access to healthy food and pharmaceuticals.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. The Preferred Alternative includes the following concepts noted in the comment: energy efficient construction; ; walkable neighborhoods with residences and services and amenities in close proximity; neighborhood streets with smaller multifamily buildings, trees, and gardens; decreased hardscape and increased vegetation, especially drought tolerant and native/near-native plants; rain gardens; and walking and biking infrastructure improvements. The Final EIS discusses new housing and design to encourage social interaction on pages 3.6-113-115 and under the Equity & Climate Vulnerability Considerations sections under each Alternative. Community gardens are not explicitly mentioned in the urban form chapter, but Seattle's policies (e.g., P-1.10, P 1.28) support community gardens, and the Final EIS includes a potential Parks mitigation measure to add community gardens, including on rooftops (page 3.11-80). Policies directly addressing tree canopy loss are on pages 3.3-24-35, regulations on page 3.3-27, and potential additional mitigation measures on pages 3.3-28-29, which emphasize trees on public rights-of-way and parks. See also **Section 4.2.1.2** regarding tree canopy and **Section 3.3 Plants & Animals.**
402	**Russell**	
402-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
403	**Saakian**	
403-1	Support the original abundance map, allowing for 10,000+ new dwelling units a year, 44+ neighborhood centers, and more.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See **Section 4.2.1.3**.
404	**Saliba**	
404-1	Suggestion on potential RSL zone between Union and East Pine Streets.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers.
404-2	Request the Final EIS include an analysis of the trade-offs between the draft anti-displacement strategies and the quantifiable need to generate more housing, specifically the amount of	The EIS studies the Proposed Plan including the growth strategy that would see generally see RSL zoning rezoned to LR zoning as part of the Plan's implementation. The analysis considers impacts from growth anticipated by the growth strategy over the next 20 years. Additionally, the Plan contains a broad range of anti-displacement policies including policies that promote affordable

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	additional housing that could be generated if all RSL-zoned land in Centers was rezoned to LR regardless of displacement risk, if all RSL-zoned land in Centers that is not a high-displacement risk was rezoned to LR, if all RSL-zoned land in Centers that is only low-displacement risk was rezoned to LR, and if none of the RSL-zoned land in Center was rezoned to LR (No Action; identify the number of homes that would likely be demolished or renovated to create luxury homes and still result in displacement in this case).	housing, increasing community ownership, protecting low income tenants from rent increases and eviction.
405	**Sanborn**	
405-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
406	**Sanchez**	
406-1	Support for corner stores in Neighborhood Residential areas. The average annual housing production rate is too low, this will impact renters, low-income people, and people of color. Allow midrise housing and mixed uses in residential areas.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See **Section 4.2.1.3** regarding studied growth and changes to zoning standards.
406-2	Support for expanding urban centers, new urban center at 130th, Ballard as new regional center, removing minimum parking requirements near transit, and allowing corner stores throughout Neighborhood Residential areas.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers.
407	**Sanders**	
407-1	Recommendations to improve the Comp Plan include; apartments allowed on all arterial with 10 minute or better bus service, apartments on all corner lots that are 50% larger than underlying zoning, improve FAR, etc.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See **Section 4.2.1.3** regarding studied growth and changes to zoning standards.
408	**Sanford**	
408-1	Similar content as Letter 95 regarding tree canopy. Draft EIS does not address saving the 6 inch and larger diameter trees we have,	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.

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	too vague about the actual projected tree loss.	
409	**Sargent**	
409-1	Disappointed to see the Plan with the potential rezone around the 145th street station removed. Want to see similar taller projects being built in Shoreline, on the Seattle side. Seattle desperately needs more housing, especially close to light rail and upzoning along these busier arterial and close to transportation makes great sense.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers.
410	**Saxton**	
410-1	Study impacts of citywide elimination of parking minimums, expanded high-rise zoning within half mile of all light rail stations, parks, grocery stores, and floor area ration bonuses. Prefer Alternative 5.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See **Section 4.2.1.3** regarding changes to zoning standards, capacity near parks, and parking minimums.
411	**Scanlon**	
411-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
412	**Scarlett 1**	
412-1	Define what affordability at all levels means.	See Response to Comment 44-1.
413	**Scarlett 2**	
413-1	Questions about Resolution 31870 to study South Park for designation criteria as an urban village. Concern that this study was never completed, yet South Park will be upzoned.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. The One Seattle Plan reclassifies the South Park Urban Village as a neighborhood center. The South Park Neighborhood Center encompasses a smaller geography than the previous urban village boundaries. Zoning within the urban center includes a reclassification of RSL zones to LR1 zones and an increase in zoned development capacity that is consistent with a neighborhood center designation.
414	**Scarlett 3**	
414-1	South Park does not fit the urban center guidelines. Why is South Park designated an urban center?	See Response to Comment 413-1.

Number	Comment Summary	Response
415	**Scarlett 4**	
415-1	Questions about South Park – why was residential small lot applied to 2500 sq ft lots in South Park while other areas of the city are 5,000 sq ft? Developers are adding much more lot coverage than is allowed, and we are losing trees fast.	See Response to Comment 413-1 and **Section 4.2.1.2** regarding tree canopy.
416	**Scarlett 5**	
416-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
417	**Schiefer, Estelle**	
417-1	Explain in detail how you plan to maintain the current tree canopy while carrying out the comprehensive plan?	See **Section 4.2.1.2** regarding tree canopy.
418	**Schiefer, Hans**	
418-1	How will the Comp. Plan increase tree canopy in frontline communities where people have more asthma and need cleaner air?	**Section 3.2 Air Quality** includes discussion of mitigation including increasing the density of tree canopy near high-volume roadways and industrial areas to block the line-of-sight to residential uses and improved air filtration in new sensitive development such as residences, schools, daycares, and hospitals. Combined, these strategies would improve indoor air. See also **Section 4.2.1.2** regarding tree canopy.
419	**Scholes**	
419-1	Similar content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.
420	**Schubert**	
420-1	Do not support the Green Lake rezoning. There is no infrastructure to support such a drastic increase in density. A sprawling corridor of multistory buildings will ruin the neighborhood.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers.
421	**Scott**	
421-1	Do not support proposal to develop District 4 as a neighborhood center (specifically intersection of NE 55th St and 40th Ave NE). Does not have sufficient business opportunities or public transit options to support high density living.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers.

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422	**Scully**	
422-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
423	**Shen**	
423-1	Clarify how you will stop continued loss of tree canopy due to in-fill development in residential neighborhoods. What studies have you made showing that planting young trees will compensate for removal of mature trees during development?	See **Section 4.2.1.2** regarding tree canopy.
424	**Shettler 1**	
424-1	Is the City required to make progress toward the 30% tree canopy goal, or is it simply aspirational?	See **Section 4.2.1.2** regarding tree canopy.
425	**Shettler 2**	
425-1	Same content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.
426	**Shettler 3**	
426-1	Similar content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.
427	**Siegelbaum**	
427-1	Similar content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.
428	**Siegfriedt 1**	
428-1	Similar content as Letter 44 and 89-92. Seventeen sets of questions including affordability, housing supply, middle housing rental supply, environmental impact of tree canopy loss. Where is the definition of affordability? The HB 1110 definition should be used. What is the likelihood that this plan will result in affordable low-income housing provided by the market? Need for programs or zoning incentives for urban residential neighborhoods? How many low-income affordable	See Responses to Comments 92-1 through 92-18.

Number	Comment Summary	Response
	rentals will be built under Alternative 5?	
429	**Siegfriedt 2**	
429-1	How can the Plan recommend paying someone to move under the Tenant Relocation Assistance program as a mitigation, when it actually facilitates displacing someone? Questions regarding displacement, MHA unit production, and the "supply-side myth" that simply building more housing creates affordability defined in HB 1110.	See **Section 3.8.2** regarding lack of supply, housing affordability, and economic displacement. See also Responses to Comment 44-2 and **Section 4.2.1.1**. Note that the Preferred Alternative includes the Proposed Plan and references measures to protect low-income tenants from rent increases and eviction and preserve affordable housing.
429-2	Isn't it true that the last Comp Plan resulted in a loss of workforce or middle-income housing, since almost all market-rate rental apartments were built for high-income workers and older housing lost to demolition? Isn't it true that continuing on the present course, as this plan does, will exacerbate the hollowing out of our middle class because of the loss of low-income housing and family-size housing affordable to them?	See Responses to Comments 44-2, 44-6, and 44-7. Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers.
429-3	Isn't it true that since infill builders will never build rentals (not their business model) and no nonprofits can build at the scale of six units or less, that no affordable rental units are likely to be built in Urban Neighborhoods? And that seniors who live there now, being priced out by rising property taxes, will have no place in their own neighborhoods to downsize, unless stacked flats and courtyard buildings are incentivized or zoned for? What are the recommendations to allow seniors (of all races) to remain in their communities of support?	See Response to Comments 44-2 and 44-8.
429-4	The Housing Element clearly displaces trees from all new development. Where is the mitigation to prevent loss of tree canopy, by stronger enforcement	See Response to Comment 44-3 and **Section 4.2.1.2** regarding tree canopy.

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	of permitting, by requiring developers to replace full-size trees with full-size trees, by determining some lots to be unbuildable? Where are your mitigations for the trees that will increase the tree canopy to 30%, rather than continuing on the present course and displacing our tree canopy?	
429-5	In the Housing Appendix, shouldn't trees be shown in the idealized drawings of housing?	Urban form diagrams in the One Seattle Comprehensive Plan Final EIS have been annotated to show how trees can be accommodated. See **Section 3.6 Land Use Patterns & Urban Form**, **Exhibit 3.6-100 through Exhibit 3.6-105**.
429-6	If buildings (condos) are allowed to be four-story blocks in Urban Residential zones, doesn't that block the sun from 2-story craftsman homes that are or are likely to have solar panels? Is this economic loss being evaluated? Shouldn't four-story buildings be grouped with taller, not shorter buildings?	See Response to Comment 293-2 regarding impacts to existing solar panels.
430	**Sims 1**	
430-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for Response to Letter 95 and similar regarding tree canopy.
431	**Sims 2**	
431-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for Response to Letter 95 and similar regarding tree canopy.
432	**Skantze**	
432-1	Similar content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for Response to Letter 83 and similar regarding plants, animals, and tree canopy.
433	**Smith**	
433-1	Supports Alternative 5 and request to study the impacts of social housing in every neighborhood.	Comments noted and forwarded to City decision makers. See **Section 4.2.1.3** regarding studied growth and **Section 4.2.1.1** regarding the affordable housing evaluation
434	**Speers**	
434-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
435	**Stephensen**	
435-1	Support recommendations by The Urbanist. Allow for taller buildings, incentive middle housing and	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes

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	affordable housing, remove barriers for increased density, etc.	related to the One Seattle Plan will be forwarded to the decision makers. See also **Section 4.2.1.3** regarding changes to zoning standards in centers additional and/or expanded neighborhood centers, corner stores, capacity near parks, and parking minimums.
436	**Stevens**	
436-1	Same content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.
437	**Stiffler**	
437-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
438	**Stockwell**	
438-1	Encourage the city to plan for more types of housing, start building out housing supply. Modifications to the Plan including but not limited to; encourage transit-oriented development, increase the FAR, add back original neighborhood center, remove parking requirements.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See also **Section 4.2.1.3** regarding changes to zoning standards in centers, additional and/or expanded neighborhood centers, corner stores, and parking minimums.
439	**Strock**	
439-1	Advocate for density	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers.
440	**Stutman**	
440-1	Support for Alternative 5 including development of a new Urban Cener on 130th Street. Plan is not ambitious enough; encourage more housing options. Suggested considerations include minimize or remove parking requirements and increase floor area ratios.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. See **Section 4.2.1.3** regarding changes to zoning standards in centers and parking minimums.
440-2	Broader rezone in the 130th street area; suggest extending upzones to more areas of the city.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers.
440-3	Consider Pastor Laura Baumgartner of the Haller Lake Methodist Church's request to allow their lot to accommodate	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes

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	both residential and commercial development	related to the One Seattle Plan will be forwarded to the decision makers.
441	**Sundquist**	
441-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
442	**Surdyke**	
442-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
443	**Swing**	
443-1	Support Alternative 2. Variation to the recommendations in Letter 95 about tree canopy protection.	Comments noted and forwarded to City decision makers. See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
444	**Talen 1**	
444-1	Support adding more housing in all neighborhoods, planning for more growth, and developing the city in a more sustainable, equity way. The city did not listen to the overwhelming majority's call for an Alternative 6 vision. In Capitol Hill in particular, I think the Plan should allow high-rise apartments.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See also **Section 4.2.1.3** regarding studied growth. Under the Preferred Alternative, a variety of housing is allowed in the First Hill/Capitol Hill Regional Center, including high-rise multifamily development in areas closest to Downtown.
445	**Talen 2**	
445-1	Study impacts of expanded high-rise zoning in Urban Neighborhoods within 1 mile of parks. Support for Alternative 5.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See **Section 4.2.1.3** regarding changes to zoning standards in centers and capacity near parks.
446	**Taylor, Patrick**	
446-1	Same content as Letter 18, including concern the alternatives are not being ambitious enough for increased density and housing. Additionally, Seattle should prioritize proximity-based strategies over mobility-based ones. Additional comment on prioritizing transmutation mode shift towards active mobility options over automobile electrification.	See Responses to Comments 18-1 through 18-10.
447	**Taylor Sarah**	
447-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.

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448	**Tenhoff-Barton**	
448-1	Not enough protection for trees. What are the mitigation strategies for loss of trees?	See **Section 4.2.1.2** regarding tree canopy.
448-2	Questions around what is considered affordable housing for middle class families, and how the plan provide for seniors.	See Response to Comment 44-1 regarding affordable housing definition and Response to Comment 44-8 regarding housing for seniors. See also **Section 4.2.1.1** regarding the affordable housing evaluation.
449	**Thiessen**	
449-1	Study the impacts of higher floor area ratios for middle housing in all residential zones. Support Alternative 5 with higher growth targets.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See **Section 4.2.1.3** regarding changes to zoning standards.
450	**Thomas, Robin**	
450-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for Response to Letter 95 and similar regarding tree canopy.
451	**Thomas, Toby**	
451-1	Same content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for Response to Letter 83 and similar regarding plants, animals, and tree canopy.
452	**Toms**	
452-1	Support for Alternative 5.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers.
453	**Toohey**	
453-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for Response to Letter 95 and similar regarding tree canopy.
454	**Travis**	
454-1	Study impacts of higher density in all residential zones, and impact on housing affordability. Supports Alternative 5.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See **Section 4.2.1.3** regarding studied growth and changes to zoning standards.
455	**Trecha**	
455-1	Support for removing parking minimums from every residential zone in the city, and increased density in all neighborhoods.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers.

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		See also **Section 4.2.1.3** regarding studied growth, changes to zoning standards in centers, and parking minimums.
456	**Tully**	
456-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
457	**Ullmann**	
457-1	Support for corner stores, small businesses and small apartment buildings in neighborhoods. Concern on lack of transit in the Maple Leaf neighborhood and the neighborhood's neighborhood center designation. Recommendation to re-site Maple Leaf's neighborhood center near Lake City Way and NE 80th St, closer to Northgate, rather than NE 90th St and Roosevelt Way, modify the circumference to a ¼-block on non-arterials, and limit density beyond a ¼-block on non-arterials.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers.
457-2	Request to reconsider requiring development to take part in the MHA program, analyze source/supply/demand/affordability over time, and encourage social housing. The Draft EIS executive summary's section on Population, Housing & Employment states that all alternatives will increase income-restricted and affordable market-rate housing by increasing housing supply. Where does this assumption come from?	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See Response to Comment 44-2 and **Section 4.2.1.1** regarding the affordable housing evaluation.
457-3	Site neighborhood centersnear transit hubs, address transportation needs of older adults, and mandate parking in residential redevelopment—question the belief that most people do not need cars or off-street parking.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. The City coordinates with Metro regarding transit service in the city.
457-4	Support the city's aspiration to achieve a 30% tree canopy, and note that coverage has shrunk in recent years. Believe more analysis of the effect of development on the tree canopy is needed for each proposed neighborhood center, and	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. Please see **Section 4.2.1.2** for responses to comments in Letters 83 and 95, concerning the process for identifying significant

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	that the Draft EIS includes statements that either are irrelevant or not supported by facts. Request guaranteed protections for large trees, to evaluate projected canopy loss for each neighborhood center, to define the time needed for newly planted trees to achieve benefits of mature trees, and to remove irrelevant and unsupported assumptions.	adverse impacts. Analyses in the EIS are consistent with SEPA requirements for programmatic, non-project reviews, per WAC 197-11-442. The analyses in the EIS have been expanded to address the potential for temporal loss (i.e., time lag between the loss of functions provided by removed trees and the replacement those functions by planted trees) of the essential benefits provided by tree canopy cover. Analyses in the EIS are not based on the assumption that the City of Seattle can exercise control over planning decisions made by other jurisdictions. Statements about the potential for reducing development pressure in outlying areas are consistent with the GMA goals of encouraging development in urban areas and reducing urban sprawl.
458	**Urban**	
458-1	Support the Housing Abundance Map, we need an ambitious plan to handle the housing crisis and cost of living crisis that go with a lack of housing.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See also **Section 4.2.1.3** regarding studied growth.
459	**Valett**	
459-1	Similar content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for Response to Letter 83 and similar regarding plants, animals, and tree canopy.
460	**Van Bronkhorst**	
460-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for Response to Letter 95 and similar regarding tree canopy.
461	**Villasana**	
461-1	Similar content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for Response to Letter 83 and similar regarding plants, animals, and tree canopy.
462	**Vitz-Wong**	
462-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for Response to Letter 95 and similar regarding tree canopy.
463	**VonVeh**	
463-1	Concern on increased density in single-family neighborhoods, including need for Comprehensive Plan to address services to support growth, impacts to tree canopy, and impacts from ferry related traffic in West Seattle.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See also **Section 4.2.1.2** and Response to Letter 44 regarding tree canopy. See **Section 3.10 Transportation** regarding transit including ferries. Travel Times on corridors including those in West Seattle are addressed. The EIS uses a travel demand model accounting for existing and expected growth in the region.

Number	Comment Summary	Response
464	**Wada**	
464-1	Support recommendations that Birds Connect Seattle submitted. City leaders must be less focused on developers, and care more about the natural greenery.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See Responses to Comment 20-1 through 20-6 and **Section 4.2.1.2** for Response to Letter 83 and similar regarding plants, animals, and tree canopy.
465	**Wade**	
465-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for Response to Letter 95 and similar regarding tree canopy.
466	**Wagner 1**	
466-1	Similar content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for Response to Letter 83 and similar regarding plants, animals, and tree canopy.
467	**Wanger 2**	
467-1	Resent Letter 466	See Response to Comment 466-1.
468	**Waldman**	
468-1	Concern for tree canopy- no more million-dollar developments with 2 dollar trees.	See **Section 4.2.1.2** regarding tree canopy.
469	**Wall**	
469-1	Why does the City use the 30% standard for considering cost-burden and what has the City done to adopt this in any official way? Concerns related to housing affordability and question the net growth in housing and jobs by alternative reported in the Housing Appendix. No Action meets the GMA/King County requirements to produce the 80,000 new housing units and the updated development capacity report estimates a capacity under existing zoning to almost double that number—what is the justification for selecting any alternative to reach 100,000 or more net new housing units? What new code requirements will need to be enacted to meet the housing needs of households between 0-50% AMI? Final EIS should include an estimate of the net new housing	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See **Section 4.2.1.1** regarding the affordable housing evaluation.

Number	Comment Summary	Response
	units that can now be created under HB1110 and the type of units (townhouses, flats, cottages) and occupancy status, i.e., rental, owner, congregate/shared housing. The estimates should recognize that nearly half of the parcels with NR-1 zoning are less than 5,000 SF.	
469-2	Does not agree with Draft EIS claim that existing regulations are adequate to mitigate all environmental impacts given the clearly observable impacts of a growing population on energy demand, water supply, surface water quality, tree canopy, air quality (more VMT and congestion) and public safety. How will the environmental impacts of becoming a city of one million people be tracked and addressed over the timeframe of this plan? Draft EIS does not address the socio-economic impacts of the Growth Strategy, including household costs, cost-of-living, and displacement risk. Final EIS should include an analysis of the public costs for infrastructure (parks, transportation, energy, drainage, wastewater, solid waste) to meet growth demands.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See Responses to Comments 132-2, 164-3 and 404-2 regarding displacement. **Section 3.1** of the Draft and Final EIS provides an analysis of the potential impacts to earth and water quality. **Section 3.1.2** analyzes the potential impacts associated with each alternative and finds that there are no significant unavoidable adverse impacts. **Section 3.3** of the Draft and Final EIS provides an analysis of the potential impacts to plants and animals, including tree canopy. **Section 3.3.2** analyzes the potential impacts associated with each alternative and finds that there would be no significant, unavoidable adverse impacts on tree canopy. **Section 3.2** of the Draft and Final EIS provides an analysis of the potential impacts to air quality and greenhouse gas emissions. **Section 3.2.2** analyzes the potential impacts associated with each alternative and finds that there are no significant adverse impacts. **Section 3.4** of the Draft and Final EIS provides an analysis of potential impacts related to energy and natural resources. **Section 3.4.2** analyzes each alternative for potential impacts and finds there are no significant adverse impacts. **Section 3.11** of the Draft and Final EIS provides an analysis of potential impacts related to public safety. **Section 3.11.2** analyzes each alternative for potential impacts and finds that for fire/emergency services, parks, schools, and solid waste there are no significant adverse impacts. For police, with investment in mitigation measures will provide adequate services for future population growth. SEPA does not require cost-benefit or economic analysis (WAC 197-11-448 and 450). See **Section 4.2.1.4**.
469-3	Area 1 is described as having significant drainage and wastewater deficits yet is targeted for the greatest percentage of new housing under two of the alternatives despite the upgrades to accommodate this growth being	The EIS acknowledges the potential conflict of adding additional population to Area 1 due to infrastructure constraints. However, there are broad areas within Area 1 that would have sufficient drainage and wastewater capacity to accommodate new households. Seattle City Light used the addition of 65,000 housing units by 2030 in its study on the impacts of electrification; it was not meant to indicate a targeted or planned growth. The growth assumptions of the alternatives go farther out then 2030 to 2044.

Number	Comment Summary	Response
	called 'cost prohibitive.' Please explain. In the section on electrical power, the Draft EIS says that City Light has plans to accommodate 65,000 additional housing units. How does that relate to the Growth Strategy that calls for between 80,000 and 100,000+ housing units? Do we really have affordable capacity to meet future electrical energy demand? Recent news coverage suggests we do not given climate change impacts.	The EIS acknowledges that upgrades to existing infrastructure will need to be made to support electrification. As noted under **Section 3.11.3**, Other Potential Mitigation Measures Seattle City Light regularly plans and adapts to changing growth patterns and are currently engaged in efforts to address electrical demand. For example, Seattle City Light has an Integrated Resource Plan (IRP) designed to prepare for future energy demands and sustainability and reliability.[105]
469-4	Draft EIS suffers from the usual problems of these documents. It does not articulate the cumulative impacts of the growth strategy and assumes that each incremental change is not significant.	Regarding cumulative impacts, please see Response to Comment 26-2.
470	**Ward, Galen**	
470-1	Support adding family-sized apartment buildings throughout Seattle. Increase FAR and height for 4- and 6-plexes, building in neighborhood centers should be taller and boundaries should expand a quarter of a mile more, add back the original neighborhood centers.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See **Section 4.2.1.3** regarding studied growth, changes to zoning standards in centers, and additional and/or expanded neighborhood centers. See also Responses to Comments 12-2, 44-6, and 132-2.
471	**Ward, Sarah**	
471-1	Same content as Letter 470.	See Response to Comment 470-1.
472	**Warsinske 1**	
472-1	Concern that increased density may lead to increased crime rates.	Comment noted. This comment is beyond the scope of environmental review of the One Seattle Plan so no response is necessary. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. Please also see **Section 3.11 Public Services** which addresses police services, including mitigation measures in **Section 3.11.3**.
473	**Warsinske 2**	
473-1	Concerns related to higher density, affordability, design, and tree canopy. Why are already crowded neighborhoods on the high density plans? Why aren't wealthier,	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision

[105] See: https://powerlines.seattle.gov/2024/08/14/how-seattle-city-light-is-planning-for-increasing-energy-demands/.

Number	Comment Summary	Response
	roomier neighborhoods being considered for urban centers/neighborhoods? Why are developers allowed to construct multiple houses on one lot with no concern regarding the negative effect on our neighborhoods? Architecturally these high density houses are a blight on any neighborhood.	makers. See **Section 4.2.1.1** regarding the affordable housing evaluation and **Section 4.2.1.2** regarding tree canopy.
474	**Wartman**	
474-1	Similar content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for Response to Letter 83 and similar regarding plants, animals, and tree canopy.
475	**Weatherford**	
475-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for Response to Letter 95 and similar regarding tree canopy.
476	**Webster 1**	
476-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for Response to Letter 95 and similar regarding tree canopy.
477	**Webster 2**	
477-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for Response to Letter 95 and similar regarding tree canopy.
478	**Weinstein, Paul**	
478-1	Similar content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for Response to Letter 83 and similar regarding plants, animals, and tree canopy.
479	**Weinstein Colleen**	
479-1	Similar content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for Response to Letter 83 and similar regarding plants, animals, and tree canopy.
480	**Weissman, Jeff**	
480-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for Response to Letter 95 and similar regarding tree canopy.
481	**Weissman, Maggie 1**	
481-1	Similar mitigation recommendations as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for Response to Letter 95 and similar regarding tree canopy.
482	**Weissman, Maggie 2**	
482-1	Similar mitigation recommendations as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for Response to Letter 95 and similar regarding tree canopy.

Number	Comment Summary	Response
483	**Westgard**	
483-1	Similar content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for Response to Letter 95 and similar regarding tree canopy.
484	**Wheeler 1**	
484-1	Protecting mature trees and remaining native plant landscape is key. Concern, questions, and disappointment with current practices around tree canopy, plants, and wildlife populations. There is no data or citation in the Draft EIS that concluded there will be no environmental impact to urban wildlife populations after adding 100,000 housing units.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See **Section 4.2.1.2** regarding plants, animals, and tree canopy.
485	**Wheeler 2**	
485	Same content as Letter 484.	See Response to Comment 484-1.
486	**Williams, Bonnie 1**	
486-1	Preference for the No Action Alternative because HB 1110 is a required upzone and should be considered as an alternative.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers.
487	**Williams, Bonnie 2**	
487-1	Similar content as Letter 95, regarding tree canopy, air quality, and plants and animals. Concern about construction and transportation noise. Land use and urban design concerns about privacy, views, and heat islands. Housing mitigation in form of MHA fees to provide more housing is desired. Cultural resources, agree with additional funding for historic surveys and modifying demolition review process. Transportation considerations include safety and east-west connectivity, prioritize cars but	**Plants, Animals, and Tree Canopy:** See **Section 4.2.1.2** for responses regarding plants, animals, and tree canopy. **Air Quality**: The commenter's concerns regarding the loss of trees during wildfire are noted. **Section 3.2 Air Quality**, includes mitigation to increase tree canopies to shield residential uses from high-volume roadways and industrial uses. **Energy**: The commenter's concerns regarding the cost to convert existing homes to electric are noted. Seattle City Light addresses several incentive programs for energy rebates, energy efficiency, and heating and cooling.[106] Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. **Noise**: The commenter expresses concerns regarding construction noise. **Section 3.5 Noise**, includes measures to reduce construction-related noise including the installation of barriers to shield noise-sensitive uses, selecting haul routes to avoid noise sensitive areas, using mufflers, low-noise emission equipment, and ongoing monitoring of noise levels.

[106] See: https://seattle.gov/city-light/residential-services/home-energy-solutions.

Number	Comment Summary	Response
	improve all modes, maintain Aurora as a priority. Public services priorities include police and fire. Parks are overcrowded. Housing needs green space. Don't make green streets permanent in Wallingford and Phinney. Require developer fees for utilities.	**Land Use:** Please see **Section 3.6** which addresses urban form including but not limited to views and heat islands. **Housing:** See mitigation measures in **Section 3.8** which describes MHA. **Cultural Resources:** Agreement with some potential mitigation measures in **Section 3.9.3** is noted and forwarded to City decision makers. **Transportation:** Preferences for improvements and priorities are noted and forwarded to City decision makers. All modes are addressed in **Section 3.10** including mitigation measures in **Section 3.10.3**. **Public Services:** See **Section 3.11** for an evaluation of police, fire, and parks. See also a discussion of the City's parks plans in **Section 4.2.1.3**. **Utilities:** Service providers address requirements to extend services for new development consistent with City regulations and system plans. For a list of regulations and commitments, see **Section 3.12.3**.
488	**Williams, Charles**	
488-1	Support Alternative 2, as it will preserve the most canopy cover and limit the removal of established trees. Saying that none of the action alternatives would have significant adverse impacts on tree canopy is not backed up by facts. The new tree protection ordinance increases potential for tree removal and loss.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See **Section 4.2.1.2** regarding tree canopy.
489	**Williams, Pamela**	
489-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for Response to Letter 95 and similar regarding tree canopy.
490	**Williams, Tony**	
490-1	Same content as question 1 through 9 in Letters 44 and 89-92. Includes questions on affordability, housing supply, middle housing rental supply, and environmental impact of tree canopy loss.	See Responses to Comments 44-1 through 44-3.
491	**Wilmot**	
491-1	Same content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.
492	**Wineman**	
492-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.

Number	Comment Summary	Response
493	**Winkle**	
493-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
494	**Wollett**	
494-1	Support Alternative 2 because it allows for the most tree and plant habitat while pursuing reasonable growth and density.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See **Section 4.2.1.2** regarding plants and tree canopy.
495	**Woo**	
495-1	Study the impacts of citywide elimination of parking minimums. Supports Alternative 5.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See Response to Comment 18-9 regarding parking.
496	**Wu**	
496-1	Questions and suggestions on GHG calculations and models of emission sources. Section 3.2.2 and Appendix D inquiry on accuracy of MOVES modeling framework. Suggestion to study impacts of FHFs as an accumulative pollutant.	The commenter erroneously claims that the greenhouse gas emissions analysis scales population data to derive the inputs of VMT data. VMT data was generated utilizing the Puget Sound Regional Council regional travel demand model, SoundCast. The model covers the four-county region of King, Kitsap, Snohomish, and Pierce counties. SoundCast is an activity-based model which estimates travel behavior across the region based on characteristics of individual persons and their households. The model produces detailed trip diaries for each simulated person in the region throughout an average weekday tracking the departure time, starting location, ending location, travel mode, and any other people sharing that trip. Non-default inputs for average speed distribution, source type populations, and road type distribution was taken from the 2017 Washington Comprehensive Emissions Inventory Technical Support Document. And do remain constant for all alternatives as speed limits and road conditions are not anticipated to differ between alternatives. Alternative 1 results in the lowest transportation-related GHG emissions because Alternative 1 is projected to result in the lowest VMT when compared to the other action alternatives which assume additional growth. Despite the increase in total VMT, the VMT per capita (per Seattle resident and employee) would be lower with the action alternatives than with Alternative 1, No Action. As discussed in EIS **Section 3.2 Air Quality& GHG Emissions**, climate change is a global issue and impacts from any singular development project or programmatic action, including the Comprehensive Plan update, would not have an individually discernible impact on global climate change. Thus, the EIS studied the impact of GHGs as a cumulative pollutant.

Number	Comment Summary	Response
497	**Young**	
497-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
498	**Zemke 1**	
498-1	Request to add 3 recent Seattle polls about the importance of trees and urban forest.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See also **Section 4.2.1.2** regarding tree canopy.
499	**Zemke 2**	
499-1	Concern and questions about analysis of plants and animals and tree canopy.	See **Section 4.2.1.2** regarding plants, animals, and tree canopy.
500	**Zemke 3**	
.	Series of questions recommendations about tree canopy and urban forest.	See **Section 4.2.1.2** for Responses to Letter 500.
501	**Zemke 4**	
501-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for Response to Letter 95 and similar regarding tree canopy.
502	**Zemke 5**	
502-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for Response to Letter 95 and similar regarding tree canopy.
503	**Zubia**	
503-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for Response to Letter 95 and similar regarding tree canopy.
504	**Zuluaga**	
504-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for Response to Letter 95 and similar regarding tree canopy.

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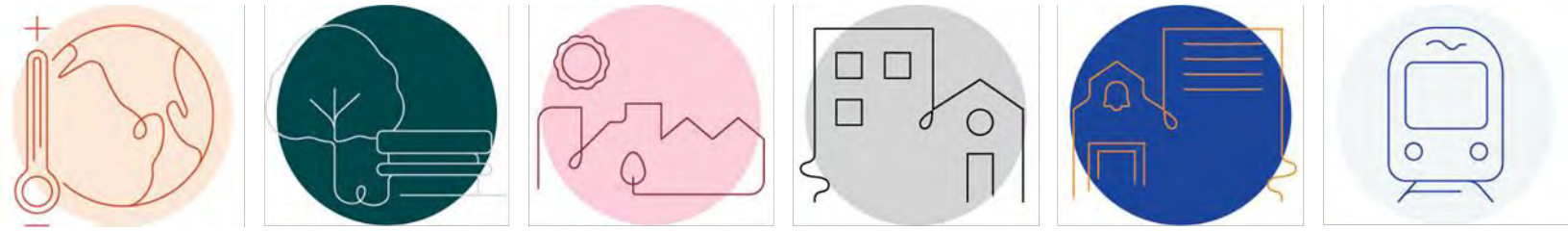
5 ACRONYMS & REFERENCES



Source: City of Seattle, 2023.

5.1 Acronyms

ADA	Americans with Disabilities Act
ALS	Advance Life Support
ARAR	Applicable or Relevant and Appropriate Requirements
ARPA	Archaeological Resources Protection Act
BINMIC	Ballard Interbay Northend MIC
BIRT	Ballard-Interbay Regional Transportation
BLS	Basic Life Support
BMP	Bicycle Master Plan
BMPs	Best Management Practices
BNSF	Burlington Northern Santa Fe
BPSA	Bicycle and Pedestrian Safety Analysis
BRT	Bus Rapid Transit
BSO	Buildings, Structures, Objects
BTU	British Thermal Unit
CAPCOA	California Air Pollution Control Officers Association
CARA	Critical Aquifer Recharge Area
CIP	Capital Improvement Program
CPPs	King Countywide Planning Policies
CPSC	Community Partners Steering Committee
CRPP	Cultural Resource Protection Plan
CSO	Combined Sewer Overflow
CTR	Commute Trip Reduction
CWA	Clean Water Act
DAHP	Washington State Department of Archaeology and Historic Preservation
dB	Decibel
dBA	A-weighted Sound Level
DNL	Day-Night Average Sound Level (see also L_{dn})
DNRP	Department of Natural Resources and Parks
DSL	Digital Subscriber Line
EA	Environmental Assessment
EDNA	Environmental Designation for Noise Abatement
EEI	Equity and Environment Initiative
EHD	Environmental Health Disparities
EIS	Environmental Impact Statement
EMS	Emergency Medical Services
EPA	U.S. Environmental Protection Agency
FHWA	Federal Highway Administration
FMP	Freight Master Plan
FTA	Federal Transit Administration
GHG	Greenhouse Gas

GLO	General Land Office
GMA	Growth Management Act
GMPC	King County Growth Management Planning Council
HBMS	Hazardous Building Material Survey
HBMS	Hazardous Building Material Surveys
HCM	Highway Capacity Manual
HPI	Historic Property Inventory
HPP	King County Historic Preservation Program
HUD	U.S. Department of Housing and Urban Development
HVAC	Heating, Ventilation, and Air Conditioning
IDDE	Illicit discharge detection and elimination
II	Industry and Innovation
ITS	Intelligent Transportation Systems
KCSWDM	King County Surface Water Design Manual
L_{dn}	Day-Night Average Sound Level (see also DNL)
LEED	Leadership in Energy and Environmental Design
L_{eq}	Equivalent Noise Level
L_{max}	Maximum Noise Level
LOS	Level of Service
LTCP	Long-term Control Plan
MCPP	Micro-Community Policing Plans
mgd	Million Gallons per Day
MIC	Manufacturing and Industrial Center
MMDF	Maximum Month Design Flow
MML	Maritime, Manufacturing, and Logistics
MPD	Multiple Property Documentation
MPH	Miles per Hour
MSATs	Mobile Source Air Toxics
MTCA	Model Toxics Control Act
MW NHA	Maritime Washington National Heritage Area
NAAQS	National Ambient Air Quality Standards
NAC	Noise Abatement Criteria
NDS	Natural Drainage Systems
NEC	National Electric Code
NEPA	National Environmental Protection Act
NHL	National Historic Landmarks
NHPA	National Historic Preservation Act
NMFS	National Marine Fisheries Service
NOAA	National Oceanic and Atmospheric Administration
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
NTHP	National Trust for Historic Preservation
NWI	National Wetlands Inventory

OPCD	Seattle Office of Planning and Community Development
OSE	Seattle Office of Sustainability and Environment
PMP	Pedestrian Master Plan
POS Plan	Parks and Open Space Plan
POSPD	Port of Seattle Police Department
PPV	Peak Particle Velocity
PSCAA	Puget Sound Clean Air Agency
PSRC	Puget Sound Regional Council
RCO	Recreation Conservation Office
RCW	Revised Code of Washington
RGC	Regional Growth Center
RMP	Risk Management Plan
RMS	Root Mean Square
RPZ	Residential Parking Zone
SCL	Seattle City Light
SCWQP	Ship Canal Water Quality Project
SDOT	Seattle Department of Transportation
SEPA	State Environmental Policy Act
SFD	Seattle Fire Department
SL	Seattle Landmarks
SLS	Seattle Library System
SMC	Seattle Municipal Code
SMP	Shoreline Master Program
SOV	Single Occupancy Vehicle
SPD	Seattle Police Department
SPR	Seattle Parks and Recreation
SPS	Seattle Public Schools
SPU	Seattle Public Utilities
SR	State Route
STC	Sound Transmission Class
STP	Seattle Transportation Plan
SWMP	Stormwater Management Program
TCP	Traditional Cultural Properties
TDM	Travel Demand Management
TMA	Transportation Management Association
TMDL	Total Maximum Daily Load
TMP	Transit Master Plan
TMP	Transportation Management Program
TSA	Transportation Security Administration
TSMO	Transportation Systems Management and Operations
UI	Urban Industrial
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey

USSG	U.S. Surveyor General
V/C	Volume to Capacity
VdB	Vibration Velocity Level
VMT	Vehicle Miles Traveled
VOC	Volatile Organic Compounds
WAC	Washington Administrative Code
WHBR	Washington Heritage Barn Register
WHR	Washington Heritage Register
WISAARD	Washington Information System for Architectural and Archaeological Records Data
WOTUS	Waters of the United States
WQ	Water Quality
WRIA	Water Resource Inventory Area
WSBLE	West Seattle and Ballard Link Extension
WSDOT	Washington State Department of Transportation
WTD	Wastewater Treatment Division
WTHP	Washington Trust for Historic Preservation
WWTP	Wastewater Treatment Plant

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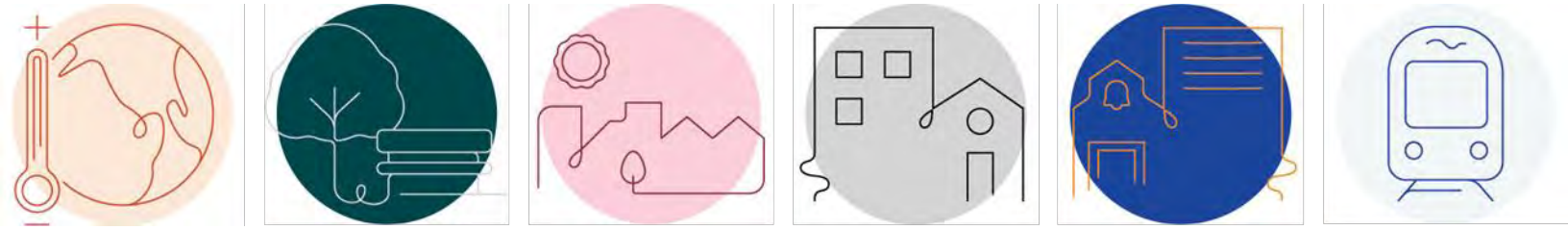
6 APPENDICES



Source: City of Seattle, 2023.

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A Scoping Notice & Comment Summary

This appendix includes the main scoping report published November 2022, which contains the summary of written comments, engagement hub responses received, and stakeholder and public meeting input. The full scoping report, including the complete compilation of comment letters, is available online at:

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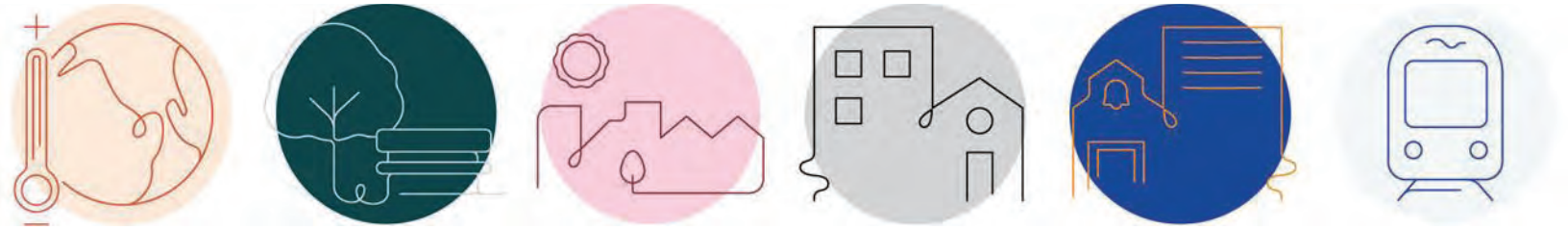

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B Detailed Estimated Growth by Alternative

Growth by Alternative

	Analysis Zone 1		Analysis Zone 2		Analysis Zone 3		Analysis Zone 4		Analysis Zone 5		Analysis Zone 6		Analysis Zone 7		Analysis Zone 8		Total	
Alternative 1	**HU Target**	**Jobs Target**	**HU Target**	**Jobs Target**	**HU Target**	**Jobs Target**	**HU Target**	**Jobs Target**	**HU Target**	**Jobs Target**	**HU Target**	**Jobs Target**	**HU Target**	**Jobs Target**	**HU Target**	**Jobs Target**	**HU Target**	**Jobs Target**
Urban Centers	-	-	6,049	6,740	3,595	2,646	18,265	90,214	9,061	3,359	-	-	-	-	-	-	36,970	102,959
Hub Urban Villages	7,588	6,504	927	622	-	-	-	-	-	-	3,128	1,597	-	-	1,242	3,053	12,885	11,776
Residential Urban Villages	3,822	2,020	1,466	366	402	281	1,010	281	3,193	1,067	1,143	897	259	450	3,469	2,373	14,764	7,735
Manufacturing Industrial Centers	-	-	-	-	628	6,100	-	-	-	-	-	-	848	12,700	-	-	1,476	18,800
Growth Area (Maritime Industrial)	-	-	-	-	-	-	-	-	144	-	-	-	392	-	140	-	676	-
Outside Subareas (This Alternative)	1,040	1,377	2,006	1,376	534	447	-	-	570	102	1,225	1,027	168	412	951	2,075	6,494	6,816
Outside Subareas (No Change All Alternatives)	1,302	1,999	2,346	1,777	859	1,060	138	238	286	164	683	1,533	262	1,007	859	2,136	6,735	9,914
Total	**13,752**	**11,900**	**12,794**	**10,881**	**6,018**	**10,534**	**19,413**	**90,733**	**13,254**	**4,692**	**6,179**	**5,054**	**1,929**	**14,569**	**6,661**	**9,637**	**80,000**	**158,000**
Share of Target	**17.2%**	**7.5%**	**16.0%**	**6.9%**	**7.5%**	**6.7%**	**24.3%**	**57.4%**	**16.6%**	**3.0%**	**7.7%**	**3.2%**	**2.4%**	**9.2%**	**8.3%**	**6.1%**		

	Analysis Zone 1		Analysis Zone 2		Analysis Zone 3		Analysis Zone 4		Analysis Zone 5		Analysis Zone 6		Analysis Zone 7		Analysis Zone 8		Total	
Alternative 2	**HU Target**	**Jobs Target**	**HU Target**	**Jobs Target**	**HU Target**	**Jobs Target**	**HU Target**	**Jobs Target**	**HU Target**	**Jobs Target**	**HU Target**	**Jobs Target**	**HU Target**	**Jobs Target**	**HU Target**	**Jobs Target**	**HU Target**	**Jobs Target**
Urban Centers	-	-	6,049	6,538	3,595	2,566	18,265	87,508	9,061	3,258	-	-	-	-	-	-	36,970	99,870
Hub Urban Villages	7,588	6,310	927	603	-	-	-	-	-	-	3,128	1,543	-	-	1,242	2,961	12,885	11,417
Residential Urban Villages	3,822	1,957	1,466	355	402	273	1,010	273	3,193	1,035	1,143	870	259	437	3,469	2,335	14,764	7,535
Manufacturing Industrial Centers	-	-	-	-	628	6,100	-	-	-	-	-	-	848	12,700	-	-	1,476	18,800
Growth Area (Maritime Industrial)	-	-	-	-	-	-	-	-	144	-	-	-	392	-	140	-	676	-
Neighborhood Anchor - Low Risk	5,394	2,236	6,541	2,198	2,402	857	-	-	3,430	723	1,706	441	-	-	546	128	20,019	6,583
Neighborhood Anchor - High Risk	-	-	453	122	-	-	-	-	-	-	2,308	1,217	506	471	881	235	4,148	2,045
Outside Subareas (This Alternative)	262	64	482	157	183	5	-	-	217	19	459	22	4	-	720	1,866	2,327	2,133
Outside Subareas (No Change All Alternatives)	1,302	1,939	2,346	1,724	859	1,028	138	230	286	159	683	1,488	262	977	859	2,072	6,735	9,617
Total	**18,368**	**12,506**	**18,264**	**11,697**	**8,069**	**10,829**	**19,413**	**88,011**	**16,331**	**5,194**	**9,427**	**5,581**	**2,271**	**14,585**	**7,857**	**9,597**	**100,000**	**158,000**
Share of Target	**18.4%**	**7.9%**	**18.3%**	**7.4%**	**8.1%**	**6.9%**	**19.4%**	**55.7%**	**16.3%**	**3.3%**	**9.4%**	**3.5%**	**2.3%**	**9.2%**	**7.9%**	**6.1%**		

	Analysis Zone 1		Analysis Zone 2		Analysis Zone 3		Analysis Zone 4		Analysis Zone 5		Analysis Zone 6		Analysis Zone 7		Analysis Zone 8		Total	
Alternative 3	**HU Target**	**Jobs Target**	**HU Target**	**Jobs Target**	**HU Target**	**Jobs Target**	**HU Target**	**Jobs Target**	**HU Target**	**Jobs Target**	**HU Target**	**Jobs Target**	**HU Target**	**Jobs Target**	**HU Target**	**Jobs Target**	**HU Target**	**Jobs Target**
Urban Centers	-	-	6,049	6,538	3,595	2,566	18,265	87,508	9,061	3,258	-	-	-	-	-	-	36,970	99,870
Hub Urban Villages	7,588	6,310	927	603	-	-	-	-	-	-	3,128	1,543	-	-	1,242	2,961	12,885	11,417
Residential Urban Villages	3,822	1,957	1,466	355	402	273	1,010	273	3,193	1,035	1,143	870	259	437	3,469	2,335	14,764	7,535
Manufacturing Industrial Centers	-	-	-	-	628	6,100	-	-	-	-	-	-	848	12,700	-	-	1,476	18,800
Growth Area (Maritime Industrial)	-	-	-	-	-	-	-	-	144	-	-	-	392	-	140	-	676	-
Neighborhood Residential	4,095	754	7,921	221	875	18	-	-	741	284	4,480	23	21	-	4,290	4,606	22,423	5,906
Outside Subareas (This Alternative)	760	1,330	1,497	1,389	355	439	-	-	334	87	743	1,056	165	401	217	153	4,071	4,855
Outside Subareas (No Change All Alternatives)	1,302	1,939	2,346	1,724	859	1,028	138	230	286	159	683	1,488	262	977	859	2,072	6,735	9,617
Total	**17,567**	**12,290**	**20,206**	**10,830**	**6,714**	**10,424**	**19,413**	**88,011**	**13,759**	**4,823**	**10,177**	**4,980**	**1,947**	**14,515**	**10,217**	**12,127**	**100,000**	**158,000**
Share of Target	**17.6%**	**7.8%**	**20.2%**	**6.9%**	**6.7%**	**6.6%**	**19.4%**	**55.7%**	**13.8%**	**3.1%**	**10.2%**	**3.2%**	**1.9%**	**9.2%**	**10.2%**	**7.7%**		

HU = Housing Unit

	Analysis Zone 1		Analysis Zone 2		Analysis Zone 3		Analysis Zone 4		Analysis Zone 5		Analysis Zone 6		Analysis Zone 7		Analysis Zone 8		Total	
Alternative 4	**HU Target**	**Jobs Target**	**HU Target**	**Jobs Target**	**HU Target**	**Jobs Target**	**HU Target**	**Jobs Target**	**HU Target**	**Jobs Target**	**HU Target**	**Jobs Target**	**HU Target**	**Jobs Target**	**HU Target**	**Jobs Target**	**HU Target**	**Jobs Target**
Urban Centers	-	-	6,049	6,538	3,595	2,566	18,265	87,508	9,061	3,258	-	-	-	-	-	-	36,970	99,870
Hub Urban Villages	7,588	6,310	927	603	-	-	-	-	-	-	3,128	1,543	-	-	1,242	2,961	12,885	11,417
Residential Urban Villages	3,822	1,957	1,466	355	402	273	1,010	273	3,193	1,035	1,143	870	259	437	3,469	2,335	14,764	7,535
Manufacturing Industrial Centers	-	-	-	-	628	6,100	-	-	-	-	-	-	848	12,700	-	-	1,476	18,800
Growth Area (Maritime Industrial)	-	-	-	-	-	-	-	-	144	-	-	-	392	-	140	-	676	-
Neighborhood Residential-Corridor	3,579	1,165	8,484	129	694	-	-	-	719	449	4,114	12	33	-	3,584	2,155	21,207	3,910
Outside Subareas (This Alternative)	910	1,371	1,769	1,549	460	447	-	-	404	91	993	1,098	164	401	587	1,894	5,287	6,851
Outside Subareas (No Change All Alternatives)	1,302	1,939	2,346	1,724	859	1,028	138	230	286	159	683	1,488	262	977	859	2,072	6,735	9,617
Total	**17,201**	**12,742**	**21,041**	**10,898**	**6,638**	**10,414**	**19,413**	**88,011**	**13,807**	**4,992**	**10,061**	**5,011**	**1,958**	**14,515**	**9,881**	**11,417**	**100,000**	**158,000**
Share of Target	**17.2%**	**8.1%**	**21.0%**	**6.9%**	**6.6%**	**6.6%**	**19.4%**	**55.7%**	**13.8%**	**3.2%**	**10.1%**	**3.2%**	**2.0%**	**9.2%**	**9.9%**	**7.2%**		

	Analysis Zone 1		Analysis Zone 2		Analysis Zone 3		Analysis Zone 4		Analysis Zone 5		Analysis Zone 6		Analysis Zone 7		Analysis Zone 8		Total	
Alternative 5	**HU Target**	**Jobs Target**	**HU Target**	**Jobs Target**	**HU Target**	**Jobs Target**	**HU Target**	**Jobs Target**	**HU Target**	**Jobs Target**	**HU Target**	**Jobs Target**	**HU Target**	**Jobs Target**	**HU Target**	**Jobs Target**	**HU Target**	**Jobs Target**
Urban Centers	6,042	4,097	6,049	6,403	3,634	2,514	18,265	85,703	9,061	3,191	-	-	-	-	-	-	43,051	101,908
Hub Urban Villages	2,546	2,256	927	591	-	-	-	-	-	-	3,140	1,526	-	-	1,242	2,900	7,855	7,273
Residential Urban Villages	3,838	1,928	3,110	704	429	267	1,010	267	3,194	1,014	2,884	1,152	1,659	671	6,738	2,875	22,862	8,878
Manufacturing Industrial Centers	-	-	-	-	628	6,100	-	-	-	-	-	-	848	12,700	-	-	1,476	18,800
Growth Area (Maritime Industrial)	-	-	-	-	-	-	-	-	144	-	-	-	392	-	140	-	676	-
Neighborhood Anchor - Low Risk	4,495	1,893	5,127	1,799	2,002	707	-	-	2,830	510	1,406	333	-	-	446	92	16,306	5,334
Neighborhood Anchor - High Risk	-	-	-	-	-	-	-	-	-	-	2,083	1,101	461	443	791	194	3,335	1,738
Neighborhood Residential	1,885	6	2,569	84	310	4	-	-	240	-	1,878	14	-	-	1,966	3,005	8,848	3,113
Neighborhood Residential-Corridor	1,390	457	3,429	49	305	-	-	-	346	177	1,674	5	14	-	1,698	850	8,856	1,538
Outside Subareas (This Alternative)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Outside Subareas (No Change All Alternatives)	1,302	1,899	2,346	1,688	859	1,007	138	226	286	156	683	1,457	262	956	859	2,029	6,735	9,418
Total	**21,498**	**12,536**	**23,557**	**11,318**	**8,167**	**10,599**	**19,413**	**86,196**	**16,101**	**5,048**	**13,748**	**5,588**	**3,636**	**14,770**	**13,880**	**11,945**	**120,000**	**158,000**
Share of Target	**17.9%**	**7.9%**	**19.6%**	**7.2%**	**6.8%**	**6.7%**	**16.2%**	**54.6%**	**13.4%**	**3.2%**	**11.5%**	**3.5%**	**3.0%**	**9.3%**	**11.6%**	**7.6%**		

	Analysis Zone 1		Analysis Zone 2		Analysis Zone 3		Analysis Zone 4		Analysis Zone 5		Analysis Zone 6		Analysis Zone 7		Analysis Zone 8		Total	
Preferred Alternative	**HU Target**	**Jobs Target**	**HU Target**	**Jobs Target**	**HU Target**	**Jobs Target**	**HU Target**	**Jobs Target**	**HU Target**	**Jobs Target**	**HU Target**	**Jobs Target**	**HU Target**	**Jobs Target**	**HU Target**	**Jobs Target**	**HU Target**	**Jobs Target**
Urban Centers	6,000	4,000	6,000	6,000	3,500	2,500	18,000	85,500	9,500	3,000	-	-	-	-	-	-	43,000	101,000
Hub Urban Villages	2,545	2,375	925	620	-	-	-	-	-	-	3,630	1,600	-	-	1,240	3,050	8,340	7,645
Residential Urban Villages	4,320	2,025	2,965	725	900	280	1,010	280	3,985	1,060	2,145	895	-	-	5,355	2,370	20,680	7,635
Manufacturing Industrial Centers	-	-	-	-	300	6,100	-	-	-	-	-	-	500	12,700	-	-	800	18,800
Neighborhood Anchor	2,960	835	2,550	835	1,260	415	-	-	1,245	160	2,055	1,325	710	1,835	780	105	11,560	5,510
Neighborhood Residential	7,630	1,650	6,010	700	2,325	840	10	-	1,780	200	3,835	1,810	295	790	1,725	5,480	23,610	11,470
Neighborhood Residential-Corridor	2,215	1,200	5,065	1,710	690	780	105	205	1,130	145	1,100	510	110	685	1,595	705	12,010	5,940
Total	**25,670**	**12,085**	**23,515**	**10,590**	**8,975**	**10,915**	**19,125**	**85,985**	**17,640**	**4,565**	**12,765**	**6,140**	**1,615**	**16,010**	**10,695**	**11,710**	**120,000**	**158,000**
Share of Target	**21.4%**	**7.7%**	**19.6%**	**6.7%**	**7.5%**	**6.9%**	**15.9%**	**54.4%**	**14.7%**	**2.9%**	**10.6%**	**3.9%**	**1.4%**	**10.1%**	**5.9%**	**7.4%**		

HU = Housing Unit, UC = Urban Center, HUV = Hub Urban Village, RUV = Residential Urban Village, MIC = Manufacturing Industrial Center

Total Existing and Net New Housing Units by Alternative

Alt 1 Type	Name of Center	Total Existing Units (DEIS)	Net Units (HU Target) (DEIS)					2024 Existing Units (FEIS)	Net Units (FEIS) Pref Alt	Total Existing Jobs (DEIS)	Net Jobs (Jobs Target) (DEIS)					2023 PSRC Existing Jobs (FEIS)	Net Jobs (FEIS) Pref Alt
			No Action	Alt 2	Alt 3	Alt 4	Alt 5				No Action	Alt 2	Alt 3	Alt 4	Alt 5		
UC	Downtown	34,696	13,658	13,658	13,658	13,658	13,658	34,862	13,500	288,234	63,149	61,255	61,255	61,255	59,992	187,799	60,000
UC	First Hill/Capitol Hill	40,139	9,061	9,061	9,061	9,061	9,061	43,861	9,500	45,527	3,359	3,258	3,258	3,258	3,191	50,654	3,000
UC	University District	11,792	3,862	3,862	3,862	3,862	3,862	15,743	4,000	16,911	3,888	3,771	3,771	3,771	3,694	36,741	3,500
UC	South Lake Union	11,199	4,607	4,607	4,607	4,607	4,607	11,627	4,500	57,498	27,065	26,253	26,253	26,253	25,712	77,542	25,500
UC	Uptown	8,837	3,595	3,595	3,595	3,595	3,634	11,392	3,500	25,643	2,646	2,567	2,567	2,567	2,514	15,174	2,500
UC	Northgate	5,171	2,187	2,187	2,187	2,187	2,187	5,274	2,000	13,010	2,852	2,766	2,766	2,766	2,709	10,222	2,500
HUV	Ballard	12,259	5,042	5,042	5,042	5,042	6,042	12,465	6,000	8,434	4,129	4,005	4,005	4,005	4,097	8,430	4,000
HUV	Bitter Lake Village	3,439	1,009	1,009	1,009	1,009	1,009	3,997	1,010	8,965	2,064	2,002	2,002	2,002	1,961	4,142	2,065
HUV	Fremont	3,990	1,537	1,537	1,537	1,537	1,537	4,418	1,535	7,251	311	302	302	302	295	7,552	310
HUV	Lake City	2,834	927	927	927	927	927	3,375	925	2,387	622	603	603	603	591	1,379	620
HUV	Mt Baker	4,295	1,242	1,242	1,242	1,242	1,242	4,320	1,240	8,884	3,053	2,961	2,961	2,961	2,900	5,236	3,050
HUV	West Seattle Junction	6,452	3,128	3,128	3,128	3,128	3,140	7,662	3,630	5,745	1,597	1,543	1,543	1,543	1,526	4,879	1,600
n/a	130th Street (Pinehurst)	1,436	194	1,049	n/a	n/a	1,644	1,489	1,500	1,062	109	284	n/a	n/a	356	494	360
RUV	23rd & Union-Jackson	8,577	1,977	1,977	1,977	1,977	1,977	n/a	n/a	6,765	679	659	659	659	645	n/a	n/a
n/a	Central District	n/a	n/a	n/a	n/a	n/a	n/a	3,317	1,370	n/a	n/a	n/a	n/a	n/a	n/a	1,180	132
n/a	Judkins Park	n/a	n/a	n/a	n/a	n/a	n/a	7,230	1,400	n/a	n/a	n/a	n/a	n/a	n/a	5,037	548
RUV	Admiral	1,265	415	415	415	415	845	2,107	915	2,249	250	243	243	243	311	2,100	250
RUV	Aurora-Licton Springs	4,268	952	952	952	952	952	4,268	950	5,679	416	404	404	404	395	2,653	415
RUV	Columbia City	4,023	1,484	1,484	1,484	1,484	1,484	4,462	1,485	3,105	1,048	1,017	1,017	1,017	996	3,301	1,050
RUV	Crown Hill	2,636	643	643	643	643	643	2,984	645	1,459	328	318	318	318	312	1,181	330
RUV	Eastlake	4,090	1,010	1,010	1,010	1,010	1,010	4,566	1,010	5,601	281	273	273	273	267	6,318	280
RUV	Green Lake	2,791	809	809	809	809	809	2,777	810	1,953	167	162	162	162	159	1,879	170
RUV	Greenwood-Phinney Ridge	2,546	501	501	501	501	517	3,404	1,000	2,737	583	564	563	563	563	2,207	585
RUV	Madison-Miller	3,770	1,216	1,216	1,216	1,216	1,216	3,822	1,215	1,759	388	376	376	376	369	1,978	380
RUV	Morgan Junction	1,549	329	329	329	329	1,439	2,325	830	690	171	166	166	166	354	861	170
RUV	North Beacon Hill	3,138	482	482	482	482	482	3,329	480	1,073	702	681	681	681	667	1,424	700
RUV	Othello	4,357	1,129	1,129	1,129	1,129	2,648	n/a	n/a	2,892	342	365	365	365	642	n/a	n/a
n/a	Graham	n/a	n/a	n/a	n/a	n/a	n/a	1,519	1,478	n/a	n/a	n/a	n/a	n/a	n/a	894	229
n/a	Othello	n/a	n/a	n/a	n/a	n/a	n/a	4,348	539	n/a	n/a	n/a	n/a	n/a	n/a	886	111
RUV	Rainier Beach	2,365	374	374	374	374	2,124	2,517	1,375	3,119	281	273	273	273	571	1,106	280
RUV	Roosevelt	3,540	1,466	1,466	1,466	1,466	1,466	4,586	1,465	3,191	366	355	355	355	348	1,959	365
RUV	South Park	1,368	259	259	259	259	1,659	n/a	n/a	1,075	450	437	437	437	671	n/a	n/a
RUV	Upper Queen Anne	1,564	402	402	402	402	429	3,007	900	1,503	281	273	273	273	267	2,608	280
RUV	Wallingford	3,425	917	917	917	917	917	3,965	915	3,847	526	510	510	510	500	2,888	525
RUV	Westwood-Highland Park	2,486	399	399	399	399	600	2,605	400	2,572	476	462	462	462	487	1,613	475
MIC	Ballard-Interbay-Northend	138	628	628	628	628	628	651	300	17,377	6,100	6,100	6,100	6,100	6,100	17,942	6,100
MIC	Greater Duwamish	204	848	848	848	848	848	446	500	61,917	12,700	12,700	12,700	12,700	12,700	66,631	12,700

HU = Housing Unit, UC = Urban Center, HUV = Hub Urban Village, RUV = Residential Urban Village, MIC = Manufacturing Industrial Center

Total Housing Units and Jobs by Alternative

		Total Housing Units								Total Jobs							
Alt 1 Type	Name	Existing (DEIS)	No Action	Alt 2	Alt 3	Alt 4	Alt 5	2024 Base	Pref Alt	Existing (DEIS)	No Action	Alt 2	Alt 3	Alt 4	Alt 5	2023 PSRC	Pref Alt
UC	Downtown	34,696	48,354	48,354	48,354	48,354	48,354	34,862	48,362	288,234	351,383	349,489	349,489	349,489	348,226	187,799	247,799
UC	First Hill/Capitol Hill	40,139	49,200	49,200	49,200	49,200	49,200	43,861	53,361	45,527	48,886	48,785	48,785	48,785	48,718	50,654	53,654
UC	University District	11,792	15,654	15,654	15,654	15,654	15,654	15,743	19,743	16,911	20,799	20,682	20,682	20,682	20,605	36,741	40,241
UC	South Lake Union	11,199	15,806	15,806	15,806	15,806	15,806	11,627	16,127	57,498	84,563	83,751	83,751	83,751	83,210	77,542	103,042
UC	Uptown	8,837	12,432	12,432	12,432	12,432	12,471	11,392	14,892	25,643	28,289	28,210	28,210	28,210	28,157	15,174	17,674
UC	Northgate	5,171	7,358	7,358	7,358	7,358	7,358	5,274	7,274	13,010	15,862	15,776	15,776	15,776	15,719	10,222	12,722
HUV	Ballard	12,259	17,301	17,301	17,301	17,301	18,301	12,465	18,465	8,434	12,563	12,439	12,439	12,439	12,531	8,430	12,430
HUV	Bitter Lake Village	3,439	4,448	4,448	4,448	4,448	4,448	3,997	5,007	8,965	11,029	10,967	10,967	10,967	10,926	4,142	6,207
HUV	Fremont	3,990	5,527	5,527	5,527	5,527	5,527	4,418	5,953	7,251	7,562	7,553	7,553	7,553	7,546	7,552	7,862
HUV	Lake City	2,834	3,761	3,761	3,761	3,761	3,761	3,375	4,300	2,387	3,009	2,990	2,990	2,990	2,978	1,379	1,999
HUV	Mt Baker	4,295	5,537	5,537	5,537	5,537	5,537	4,320	5,560	8,884	11,937	11,845	11,845	11,845	11,784	5,236	8,286
HUV	West Seattle Junction	6,452	9,580	9,580	9,580	9,580	9,592	7,662	11,292	5,745	7,342	7,288	7,288	7,288	7,271	4,879	6,479
n/a	130th Street (Pinehurst)	1,436	1,630	2,485	2,035	2,205	3,080	1,489	2,989	1,062	1,171	1,346	1,254	1,288	1,418	494	854
RUV	23rd & Union-Jackson	8,577	10,554	10,554	10,554	10,554	10,554	n/a	n/a	6,765	7,444	7,424	7,424	7,424	7,410	n/a	n/a
n/a	Central District	n/a	n/a	n/a	n/a	n/a	n/a	3,317	4,687	n/a	n/a	n/a	n/a	n/a	n/a	1,180	1,312
n/a	Judkins Park	n/a	n/a	n/a	n/a	n/a	n/a	7,230	8,630	n/a	n/a	n/a	n/a	n/a	n/a	5,037	5,585
RUV	Admiral	1,265	1,680	1,680	1,680	1,680	2,110	2,107	3,022	2,249	2,499	2,492	2,492	2,492	2,560	2,100	2,350
RUV	Aurora-Licton Springs	4,268	5,220	5,220	5,220	5,220	5,220	4,268	5,218	5,679	6,095	6,083	6,083	6,083	6,074	2,653	3,068
RUV	Columbia City	4,023	5,507	5,507	5,507	5,507	5,507	4,462	5,947	3,105	4,153	4,122	4,122	4,122	4,101	3,301	4,351
RUV	Crown Hill	2,636	3,279	3,279	3,279	3,279	3,279	2,984	3,629	1,459	1,787	1,777	1,777	1,777	1,771	1,181	1,511
RUV	Eastlake	4,090	5,100	5,100	5,100	5,100	5,100	4,566	5,576	5,601	5,882	5,874	5,874	5,874	5,868	6,318	6,598
RUV	Green Lake	2,791	3,600	3,600	3,600	3,600	3,600	2,777	3,587	1,953	2,120	2,115	2,115	2,115	2,112	1,879	2,049
RUV	Greenwood-Phinney Ridge	2,546	3,047	3,047	3,047	3,047	3,063	3,404	4,404	2,737	3,320	3,301	3,300	3,300	3,300	2,207	2,792
RUV	Madison-Miller	3,770	4,986	4,986	4,986	4,986	4,986	3,822	5,037	1,759	2,147	2,135	2,135	2,135	2,128	1,978	2,358
RUV	Morgan Junction	1,549	1,878	1,878	1,878	1,878	2,988	2,325	3,155	690	861	856	856	856	1,044	861	1,031
RUV	North Beacon Hill	3,138	3,620	3,620	3,620	3,620	3,620	3,329	3,809	1,073	1,775	1,754	1,754	1,754	1,740	1,424	2,124
RUV	Othello	4,357	5,486	5,486	5,486	5,486	7,005	n/a	n/a	2,892	3,234	3,257	3,257	3,257	3,534	n/a	n/a
n/a	Graham	n/a	n/a	n/a	n/a	n/a	n/a	1,519	2,996	NA	n/a	n/a	n/a	n/a	n/a	894	1,123
n/a	Othello	n/a	n/a	n/a	n/a	n/a	n/a	4,348	4,887	NA	n/a	n/a	n/a	n/a	n/a	886	997
RUV	Rainier Beach	2,365	2,739	2,739	2,739	2,739	4,489	2,517	3,892	3,119	3,400	3,392	3,392	3,392	3,690	1,106	1,386
RUV	Roosevelt	3,540	5,006	5,006	5,006	5,006	5,006	4,586	6,051	3,191	3,557	3,546	3,546	3,546	3,539	1,959	2,324
RUV	South Park	1,368	1,627	1,627	1,627	1,627	3,027	n/a	n/a	1,075	1,525	1,512	1,512	1,512	1,746	n/a	n/a
RUV	Upper Queen Anne	1,564	1,966	1,966	1,966	1,966	1,993	3,007	3,907	1,503	1,784	1,776	1,776	1,776	1,770	2,608	2,888
RUV	Wallingford	3,425	4,342	4,342	4,342	4,342	4,342	3,965	4,880	3,847	4,373	4,357	4,357	4,357	4,347	2,888	3,413
RUV	Westwood-Highland Park	2,486	2,885	2,885	2,885	2,885	3,086	2,605	3,005	2,572	3,048	3,034	3,034	3,034	3,059	1,613	2,088
MIC	Ballard-Interbay-Northend	138	766	766	766	766	766	651	951	17,377	23,477	23,477	23,477	23,477	23,477	17,942	24,042
MIC	Greater Duwamish	204	1,052	1,052	1,052	1,052	1,052	446	946	61,917	74,617	74,617	74,617	74,617	74,617	66,631	79,331

HU = Housing Unit, UC = Urban Center, HUV = Hub Urban Village, RUV = Residential Urban Village, MIC = Manufacturing Industrial Center

C Infill Exemption Summary of Law & List of Codes as Mitigation

C HOUSING & INFILL EXEMPTION

1 Introduction

Seattle is considering updating our thresholds for environment review consistent with the housing and infill exemption provisions of the State Environmental Policy Act (SEPA).

Currently, Seattle exempts single-family residential development of 4 units or less from undergoing review under SEPA. Using the housing and infill exemption under RCW 43.21c.229, the City has varied the exemption levels depending on if the proposal is inside or outside of an urban center or urban village and if that area is below or above planned growth estimates. The basic residential exemptions until recently were set at low levels that vary by zone type outside of urban centers or urban villages, ranging from 4 to 20 units depending on zone category. However, state bill ESSHB 5412, which was passed in 2023, removed SEPA review for most residential uses through at least September 2025. Seattle Director's Rule 9-2023 describes the current SEPA thresholds on an interim basis due to the influence of changes related to ESSHB 5412. Commercial uses in some commercial or industrial zones are in the range of default and maximum exemptions. See **Exhibit 1**.

Exhibit 1. Categorical Exemptions—State Rules and City Regulations

Project Type	Outside UC/UV	In UC/UV Growth Less Than Estimates	In UC/UV Growth Greater than Estimates
Single family residential	4	4	4
Multifamily residential	4	NR, RSL, I: 4 MPC-YT: 30 Downtown: 250 LR, NC, C, MR, HR, SM: 200	NR, RSL, I: 4 All others: 20
Office, school, commercial (square feet) w/parking or stand-alone parking lot	NR, RSL, and LR, MR, HR, NC: 4,000 sf C1, C2, and SM, Industrial: 12,000 sf	NR, RSL, LR1, MPC-YT, Industrial: 12,000 sf (not part of mixed use dev)	12,000 sf

Project Type	Outside UC/UV	In UC/UV Growth Less Than Estimates	In UC/UV Growth Greater than Estimates
		LR2, LR3, MR, HR, NC1, NC2, NC3, C1, C2, SM, Downtown: 30,000 sf if part of mixed use development	

UC = Urban Center, UV = Urban Village. Other acronyms refer to zone names. See this link for more context: https://library.municode.com/wa/seattle/codes/municipal_code?nodeId=TIT25ENPRHIPR_CH25.05ENPOPR_SUBCHAPTER_IXCAEX_25.05.800CAEX.

The City is considering applying an updated housing and infill exemption under RCW 43.21C.229. This would allow the City to exempt residential development and modify thresholds for mixed-use development after the temporary residential exemption expires. Development that is not subject to SEPA would still be subject to the City's robust development regulations and permit review process. The City may also consider raising thresholds for minor new construction per WAC 197-11-800(1)(c) which requires similar documentation regarding environmental analysis, protection, and mitigation as contained in this appendix for the infill and housing exemption under RCW 43.21c.229.

This document outlines requirements, identifies proposed infill exemption locations, and describes policies and regulations that mitigate impacts.

2 Housing and Infill Exemption Allowances

To accommodate infill development in urban areas not meeting the density goals of a Comprehensive Plan, the City can establish an infill exemption where development that is consistent with City regulations is not required to undergo new environmental review, provided that the probable adverse environmental impacts have been adequately addressed by local regulations and that the City's Comprehensive Plan was previously subject to an Environmental Impact Statement (EIS). The City of Seattle is preparing a new EIS for its Comprehensive Plan periodic update due in 2025.

The provisions in RCW 43.21C.229 allows cities to exempt residential development and raise SEPA thresholds for, mixed-use development including housing, and single-purpose commercial (non-retail) development up to 65,000 square feet.

Senate Bill 5412 (2023) added new section RCW 43.21C.229(3) allowing the City to adopt a new SEPA exemption for all project actions proposing to develop housing units provided:

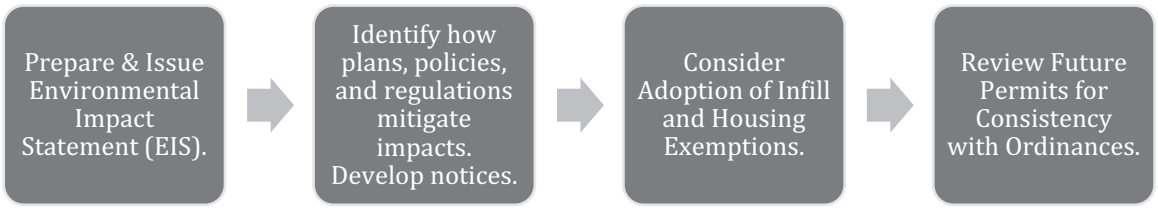
- the development is consistent with all development regulations;
- the development is consistent with the proposed use or density and intensity of use in the designated infill area;
- the EIS prepared for the exemption analyzes multimodal transportation impacts, including impacts to neighboring jurisdictions, transit facilities, and the state transportation system

including documented consultation with the Washington State Department of Transportation;

- the EIS documents that the comprehensive plan, subarea plans, adopted regulations, and state and federal regulations adequately mitigates impacts; and
- there is a 60-day notice to affected tribes, state agencies, and other jurisdictions and public before the environmental analysis is completed.

The Infill Exemption process is summarized in **Exhibit 2**.

Exhibit 2. Infill and Housing Exemption Process



3 Housing & Infill Exemption Legislation

This section quotes key infill exemption provisions.

RCW 43.21C. 229[1]

Section 1

- RCW 43.12C. 229 aims to accommodate infill and housing developments. Any city or county planning under RCW 36.70A.040 is authorized by this section to establish categorical exemptions from the requirements of this chapter. An exemption may be adopted by a city or county under this subsection if it meets the following criteria in Sections 2 and 3.

Section 2

- (a) Exempt government action related to development proposed to fill in an urban growth area, designated according to RCW 36.70A.110, where current density and intensity of use in the area is roughly equal to or lower than called for in the goals and policies of the applicable comprehensive plan and the development is either:
  - Residential development;
  - Mixed-use development; or

[1] Infill development—Categorical exemptions from chapter: https://app.leg.wa.gov/RCW/default.aspx?cite=43.21C.229&pdf=true as amended https://lawfilesext.leg.wa.gov/biennium/2023-24/Pdf/Bills/Session%20Laws/Senate/5412-S2.SL.pdf.

- Commercial development up to 65,000, excluding retail development;

- (b) It does not exempt government action related to development that is inconsistent with the applicable comprehensive plan or would clearly exceed the density or intensity of use called for in the goals and policies of the applicable comprehensive plan;
- (c) The local government considers the specific probable adverse environmental impacts of the proposed action and determines that these specific impacts are adequately addressed by the development regulations or other applicable requirements of the comprehensive plan, subarea plan element of the comprehensive plan, planned action ordinance, or other local, state, or federal rules or laws;
- (d)
  - The city or county's applicable comprehensive plan was previously subjected to environmental analysis through an environmental impact statement under the requirements of this chapter prior to adoption; or
  - The city or county has prepared an environmental impact statement that considers the proposed use or density and intensity of use in the area proposed for an exemption under this section.

Section 3

- All project actions that propose to develop one or more residential housing units within the incorporated areas in an urban growth area designated pursuant to RCW 36.70A.110 or middle housing with the incorporated areas in an urban growth area designated pursuant to RCW 36.70.110, and that meet the criteria identified in section (a) and section (b) of this subsection, are categorically exempt from the requirements of this chapter. For purposes of this section, “middle housing” has the same meaning as in RCW 36.70.030. Jurisdictions shall satisfy the following criteria prior to the adoption of the categorical exemption under this subsection:
  - (a) The city or county shall find that the proposed development is consistent with all development regulations implementing an applicable comprehensive plan adopted according to chapter 36.70A. RCW by the jurisdiction in which the development is proposed, with the exception of any development regulation that is inconsistent with applicable provisions of chapter 36.70A RCW; and
  - (b) The city or county has prepared environmental analysis that considers the proposed use or density and intensity of use in the area proposed for an exemption under this section and analyzes multimodal transportation impacts, including impacts to neighboring jurisdictions, transit facilities, and the state transportation system.
    - (i) Such environmental analysis shall include documentation that requirements for environmental analysis, protection, and mitigation for impacts to elements of the environment have been adequately addressed for the development exempted. The requirements may be addressed in locally adopted comprehensive plans, subarea plans, adopted development regulation, other applicable local ordinances and

regulations, or applicable state and federal regulations. The city or county must document its consultation with the department of transportation on impacts to state-owned transportation facilities including consideration of whether mitigation is necessary for impacts to transportation facilities.

- (ii) Before finalizing the environmental analysis pursuant to (b) (i), the city or county shall provide a minimum of 60 days' notice to affected tribes, relevant state agencies, other jurisdictions that may be impacts, and the public. If a city or county identifies that mitigation measures are necessary to address specific probable adverse impacts, the city or county must address those impacts required mitigation identified in the environmental analysis pursuant to this subsection (3) (b) through locally adopted comprehensive plans, subarea plans, development regulations, or other applicable local ordinances and regulations. Mitigation measures shall be detailed in an associated environmental determination.
- The categorical exemption is effective 30 days following action by a city or county pursuant to (b) (ii) of this subsection.

Section 4

- Until September 30, 2025, all project actions that propose to develop one or more residential housing or middle housing units within a city west of the crest of the Cascade mountains with a population of 700,000 or more are categorically exempt from the requirements of this chapter. After September 30, 2025, project actions that propose to develop one or more residential housing or middle housing units within the city may utilize the categorical exemption in subsection (3) of this section.

Section 5

- Any categorical exemption adopted by a city or county under this section applies even if it differs from the categorical exemptions adopted by rule of the department under RCW 10 43.21C.110(1)(a). Nothing in this section shall invalidate categorical exemptions or environmental review procedures adopted by a city or county under a planned action pursuant to RCW 43.21C.440. However, any categorical exemption adopted by a city or county under 14 this section shall be subject to the rules of the department adopted according to RCW 43.21C.110(1)(a) that provide exceptions to the use of categorical exemptions adopted by the department.

When Infill Exemptions Do Not Apply

Under RCW 43.21C.229(5), the infill or housing categorical exemption adopted by a city or county is still subject to the exceptions adopted by rule by the Department of Ecology.

If any of the following exceptions apply, then a proposed project is not exempt from SEPA:

- The proposal includes other non-exempt activities, see WAC 197-11-305:(1)(b).

- The proposal is undertaken wholly or partly on lands covered by water, see WAC 197-11-800:(1)(a)(i).
- The proposal requires a non-exempt NPDES permit, including construction stormwater general permits for sites 5 acres and above, see WAC 197-11-800:(1)(a)(ii).
- The proposal requires a non-exempt license governing emissions to air, see WAC 197-11-800:(1)(a)(iii).
- The proposal requires a land use decision that is not exempt under WAC 197-11-800:(6), see WAC 197-11-800:(1)(a)(iv).
- The proposal includes demolition of structures or facilities with recognized historical significance such as listing in a historic register, see WAC 197-11-800:(2)(g).
- The proposal requires a Class IV forest practices approval, see RCW 43.21C.037.

Effective Date

Categorical exemptions adopted under RCW 43.21C.229 (3) become effective 30-days after the adoption of the enacting ordinance, except that the City of Seattle cannot adopt the housing exemption until the current temporary housing exemption expires on September 30, 2025. After that date the City may enact such regulations with an effective date of October 1, 2025.

4 Overview Housing & Infill Exemption Components

The City is considering a residential exemption and raising SEPA thresholds for, mixed-use development including housing, and single-purpose commercial (non-retail) development up to 65,000 square feet throughout the City. Final exemptions could vary by place type or other geographic location.

Alternatives & Growth Evaluated

Six alternatives are reviewed in the Final EIS that would vary the potential locations for new and expanded mixed use centers as well as allow middle housing in more Neighborhood Residential areas.

See **Exhibit 3** for a comparison of housing and job growth numbers. Growth by place type is included in Appendix B of the Final EIS.

Exhibit 3. Summary of Housing and Job Growth Share—Citywide Alternatives

	Alternative 1: No Action	Alternative 2: Focused	Alternative 3: Broad	Alternative 4: Corridor	Alternative 5: Combined	Preferred Alternative
Housing	80,000	100,000	100,000	100,000	120,000	120,000
Jobs	158,000	158,000	158,000	158,000	158,000	158,000

Sources: City of Seattle, 2023; BERK, 2023.

Housing Types

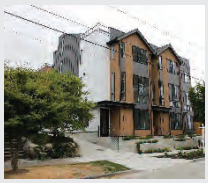
The alternatives allow more infill development to support a range of housing types including middle housing. The City proposes other code changes to improve environmental quality as described in the following section. The housing types that would be most commonly built are illustrated in **Exhibit 4**.

Exhibit 4. Example Housing Types

Detached Homes on a Small Lot
Existing home preserved with two new homes added behind (left), three homes on one lot (middle), and eight homes on two lots (right).

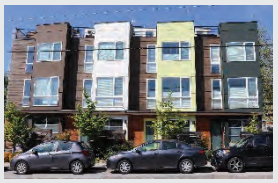
Detached Accessory Dwelling Unit (DADU)
A second unit added to a residential lot, usually behind the main house.

Cottage Housing
Detached homes of 2-3 stories arranged around a shared open space.



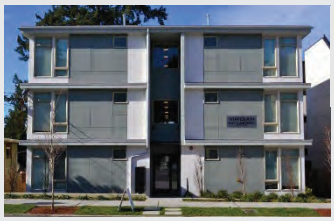
Courtyard Housing
Attached homes of 2-3 stories arranged around a shared open space.

Duplex & Triplex (side-by-side)
Two or three units that share walls with one another.



Townhouse & Rowhouse
Homes that share a wall with another home that can all be owned outright.

Foursquare
A traditional form with two units per floor in a structure that often resembles a large house.



Sixplex
A three-story structure with two homes per floor.

8-plex
A four-story structure with two homes per floor.

Apartments & Condos of 5-8 Stories
Midrise buildings with multiple homes per floor that can be rented as apartments or owned as condominium units.

Highrise Apartments & Condos
Buildings above 12 stories with multiple homes per floor that can be rented as apartments or owned as condominium units.

Source: City of Seattle, 2024.

Infill development would allow for dwellings that fit the intent of the zone, and would be subject to City zoning standards for height, setbacks, landscaping, access, etc. See the type and densities of housing by place type in **Exhibit 5**.

Exhibit 5. Most Common Housing Types Expected in Future Development by Place Type

	Urban Neighborhood	Corridors	Neighborhood Centers	Urban Centers	Regional Centers
Detached home	X	X			
Duplex, triplex, and fourplex	X	X	X		
Townhouse and rowhouse	X	X	X	X	
Sixplex/3-story stacked flats	X	X	X	X	
4- to 5-story building		X	X	X	X
6- to 7-story buildings			X	X	X
8- to 12-story buildings				X	X
Highrise buildings (above 12 stories)					X

Source: City of Seattle, 2022.

Mitigating Policies & Regulations

The State Environmental Policy Act (SEPA) was passed by the Washington State Legislature in 1971. The statute creates a review and evaluation framework centering the identification and mitigation of impacts to the natural and built environment.

Numerous state and federal laws also require that counties and cities like Seattle adopt regulations protecting water quality, wetlands, streams, fish and wildlife, floodplains, archaeological and cultural resources, air quality, noise, transportation, building, fire protection, energy, and more.

The Governor's Office for Regulatory Innovation and Assistance provides guidebooks and flow charts to help clarify complex procedures illustrating the level of scrutiny given to development. (See: https://www.oria.wa.gov/site/alias__oria/347/Permitting.aspx.)

The City of Seattle has numerous regulations that apply to development, and that have improved in specificity and quality since the passage of SEPA in 1971. The City can condition development through its permit review process.

The City applies critical area protection, tree protection, stormwater controls, archaeological resources protection, recreation, landscaping and open space standards, view protection, adequate public facilities and services, lighting, storage, solid waste and recycling, streets, sidewalks, trails, and access, design standards, and other protections.

The City's key regulations are listed in **Exhibit 6**. Several are undergoing amendment with the One Seattle Comprehensive Plan periodic update to address critical areas regulations and best available science, new zones and housing allowances, and design standards particularly for centers and transit-oriented development. In addition, the City is updating the Seattle

Transportation Plan and Seattle Parks Master Plan. New regulations and other standards could flow from those plan updates.

Exhibit 6. Current Zoning and Municipal Code Chapters

Title	Subtitles and Chapters
Title 22 - BUILDING AND CONSTRUCTION CODES	Subtitle I - Construction Codes Subtitle IB - Grading Code Subtitle II - Housing Code Subtitle V - Plumbing Code Subtitle VI - Fire Code Subtitle VIII - Stormwater Code Subtitle IX - Permit Fees Subtitle X - Miscellaneous Rules and Regulations
Title 23 - LAND USE CODE **Subtitle I - General Provisions** **Subtitle II - Platting Requirements** **Subtitle III - Land Use Regulations** **Subtitle IV - Administration**	Subtitle I - General Provisions Subtitle II. - Platting Requirements Subtitle III - Land Use Regulations Division 1 - Land Use Zones Division 2 - Authorized Uses and Development Standards Chapter 23.40 - Compliance with Regulations Required—Exceptions Chapter 23.41 - Design Review Chapter 23.42 - General Use Provisions Chapter 23.44 - Neighborhood Residential Chapter 23.45 - Multifamily Chapter 23.46 - Residential—Commercial Chapter 23.47a - Commercial Chapter 23.48 - Seattle Mixed Chapter 23.49 - Downtown Zoning Chapter 23.50 - Industrial Chapter 23.50a - Industrial and Maritime Chapter 23.51a - Public Facilities in Residential Zones Chapter 23.51b - Public Schools in Residential Zones Chapter 23.52 - Transportation Concurrency, and Transportation Impact Mitigation Chapter 23.53 - Requirements For Streets, Alleys, and Easements Chapter 23.54 - Quantity and Design Standards for Access, Off-Street Parking, and Solid Waste Storage Chapter 23.55 - Signs Chapter 23.57 - Communications Regulations Chapter 23.58a - Incentive Provisions Chapter 23.58b - Affordable Housing Impact Mitigation Program for Commercial Development

Title	Subtitles and Chapters
	Chapter 23.58c - Mandatory Housing Affordability for Residential Development
	Chapter 23.58d - Green Building Standard
	Division 3 - Overlay Districts
	Chapter 23.59 - General Provisions
	Chapter 23.60a - Seattle Shoreline Master Program Regulations
	Chapter 23.61 - Station Area Overlay District
	Chapter 23.64 - Airport Height Overlay District
	Chapter 23.66 - Special Review Districts
	Chapter 23.67 - Southeast Seattle Reinvestment Area
	Chapter 23.69 - Major Institution Overlay District
	Chapter 23.70 - Mobile Home Park Overlay District
	Chapter 23.71 - Northgate Overlay District
	Chapter 23.72 - Sand Point Overlay District
	Chapter 23.73 - Pike/Pine Conservation Overlay District
	Chapter 23.74 - Stadium Transition Area Overlay District
	Division 4 - Master Planned Communities
	Chapter 23.75 - Master Planned Communities
	Subtitle IV - Administration
	Division 1 - Land Use Approval Procedures
	Chapter 23.80 - Essential Public Facilities
	Division 2 - General Terms
	Chapter 23.84A - Definitions
	Chapter 23.86 - Measurements
	Division 3 - Implementation
	Chapter 23.88 - Rules; Interpretation
	Chapter 23.90 - Enforcement of the Land Use Code
	Chapter 23.91 - Citation—Hearings—Penalties
Title 25 - ENVIRONMENTAL PROTECTION AND HISTORIC PRESERVATION	Chapter 25.02 - Commute Trip Reduction
	Chapter 25.05 - Environmental Policies and Procedures
	Chapter 25.06 - Floodplain Development
	Chapter 25.08 - Noise Control
	Chapter 25.09 - Regulations for Environmentally Critical Areas
	Chapter 25.10 - Radiofrequency Radiation
	Chapter 25.11 - Tree Protection
	Chapter 25.12 - Landmarks Preservation
	Chapter 25.16 - Ballard Avenue Landmark District
	Chapter 25.20 - Columbia City Landmark District
	Chapter 25.21 - Fort Lawton Landmark District
	Chapter 25.22 - Harvard-Belmont Landmark District
	Chapter 25.24 - Pike Place Market Historical District

Title	Subtitles and Chapters
	Chapter 25.28 - Pioneer Square Historical District
	Chapter 25.30 - Sand Point Naval Air Station Landmark District
	Chapter 25.32 - Table of Historical Landmarks

As part of the EIS, the ability of existing and proposed policies and regulations to serve as mitigation are included in **Section 5**.

5 Current Mitigation Measures

Exhibit 7 identifies current regulations, plans, and policies that serve as mitigation measures for new development. The City is anticipating new or updated regulations as part of the Proposal and action alternatives. These codes will be added to the chart such as in the Final EIS.

Key acronyms include:

- SMC: Seattle Municipal Code (City of Seattle)
- RCW: Revised Code of Washington (State)
- WAC: Washington Administrative Code (State)
- USC: United States Code (Federal)

Exhibit 7. Current Regulations, Plans, and Policies Serving as Mitigation Measures

EIS Topic	Applicable Regulation	Code Citation	Notes/Comments
Earth and Water Quality			
	Coastal Zone Management Act	16 USC 1451 et seq.	Goal is to preserve, protect, develop, and where possible, to restore or enhance the resources of the nation's coastal zone.
	Shoreline Management Act	▪ RCW 90.58 ▪ WAC 173-26	Balance shoreline use, public access, and environmental conservation and protection. Protect critical areas and ensure no-net-loss of shoreline ecological function.
	Shoreline Master Program	SMC 23.60A	
	National Flood Insurance Act of 1968	The Federal Emergency Management Agency (FEMA)	Flooding is addressed through participation in the National Flood Insurance Program (NFIP). Flood Insurance Rate Map (FIRM) or Flood Hazard Boundary Maps identify geographic areas that the FEMA has defined according to varying levels of flood risk. Restricts building in floodways, and allows construction in floodplain provided standards for floodproofing are addressed.
	Flood Disaster Protection Act of 1973	42 USC 4001 et seq.	
	Floodplain Management Presidential Executive Order 11988	FEMA	
	Flood Control Management Act	RCW 86	

EIS Topic	Applicable Regulation	Code Citation	Notes/Comments
	Floodplain Development	SMC 25.06	
	Critical Areas Ordinance ▪ SMC 25.09.080—Landslide-Prone Areas ▪ SMC 25.09.090—Steep Slope Erosion Hazard Areas ▪ SMC 25.09.100—Liquefaction-Prone Areas ▪ SMC 25.09.110—Peat Settlement-Prone Areas ▪ SMC 25.09.160—Wetlands and Wetland Buffers ▪ SMC 25.09.200—Fish and Wildlife Habitat Conservation Areas SMC 25.09.220—Abandoned Landfills	SMC 25.09	▪ Protects functions and values of critical areas . ▪ Protects life and property from hazards. ▪ Protects water quality (erosion, wetlands, riparian regulations)
	Stormwater Code and Manual	SMC Title 22, Subtitle VIII See Sections 22.800 to 22.808	▪ Stormwater, Grading & Drainage ordinances include environmental & water quality protections, to meet applicable State guidance that includes Ecology's Stormwater Management Manual.
	Stormwater Management Manual for Western Washington (Ecology Manual)	Department of Ecology	
	Washington State Department of Transportation (WSDOT) Highway Runoff Manual	Washington State Department of Transportation	
	Water Quality Standards for Surface Waters	WAC 173-201A	▪ Designated water uses and criteria.
	Water Quality Standards for Groundwater	WAC 173-200	▪ Maintain the highest quality of the state's groundwaters and protect existing and future beneficial uses of the groundwater.
	Water Pollution Control Act	RCW 90.48	Control and prevent the pollution of streams, lakes, rivers, ponds, inland waters, salt waters, water courses, and other surface and underground waters of the state of Washington
	National Pollutant Discharge Elimination System (NPDES) Construction Stormwater General Permit	Department of Ecology	Manage and control stormwater runoff so that it does not pollute downstream waters. Implement a stormwater program that provides equal or greater protection of receiving waters and pollutant control as compared to the Stormwater Management Manual of Western Washington in effect.

EIS Topic	Applicable Regulation	Code Citation	Notes/Comments
	WSDOT Hydraulics Manual	Hydraulics Manual	Policy for designing hydraulic features related to Washington State Department of Transportation (WSDOT) roadways including hydrology, culverts, open-channel flow, drainage collection and conveyance systems, water crossings, and pipe materials. The Hydraulics Manual makes frequent references to WSDOT's Highway Runoff Manual, which provides WSDOT's requirements for managing stormwater discharges to protect water quality, beneficial uses of the state's waters, and the aquatic environment in general.
	Washington State Hydraulic Code	WAC 220-660	Minimize project-specific and cumulative impacts to fish life as a result of proposals to use, divert, obstruct, or change the natural flow or bed of any of the salt or freshwaters of the state.
	Clean Water Act See the following Sections: ▪ 401—Water Quality Certification ▪ 402—National Pollutant Discharge Elimination System ▪ 404—Permits for Dredge or Fill	USC 1251 et seq.	Regulates discharges of pollutants into the waters of the U.S. and regulates quality standards for surface waters.
	Rivers and Harbors Act of 1899 See Section 408	33 USC 408	Protects navigable waters in the development of harbors and other construction and excavation.
	Safe Drinking Water Act See Chapter 6A	42 USC 300f et seq.	Protect the quality of drinking water in the U.S.
Air Quality			
	National Ambient Air Quality Standards (NAAQS)		Requires US EPA to set National Ambient Air Quality Standards (40 CFR part 50) for six principal pollutants ("criteria" air pollutants) which can be harmful to public health and the environment.
	Washington State Department of Ecology Rules		Ecology and the Puget Sound Clean Air Agency monitors and tracks emissions to make sure levels of outdoor air pollutants meet federal and state air quality standards. They focus on EPA's "criteria" pollutants and other chemicals broadly known as air toxics.
	Puget Sound Clean Air Agency Rules		Regulates a range of businesses and industries and construction to meet air standards.

EIS Topic	Applicable Regulation	Code Citation	Notes/Comments
	Washington State Energy Code	SMC Chapter 22.101 - Adoption of Construction Codes	Regulates the energy-use features of new and remodeled buildings. Seattle is planning to adopt the 2021 energy code in 2024.
	Seattle Climate Action Plan and Strategies		A set of short- and long-term actions to reduce contributors of greenhouse gases, particularly transportation and buildings.
	Seattle Energy Benchmarking Law	SMC 22.920	Building owners of each building subject to nonresidential benchmarking requirements shall provide to the Director energy benchmarking reports and, energy performance ratings for each subject building.
	Seattle Transportation Electrification Blueprint		Consists of a series of initial steps Seattle is committed to reducing climate pollution in the transportation sector.
Plants and Animals			
	Environmentally Critical Areas Ordinance	SMC 25.09	Protects and regulates activities on or adjacent to critical areas; critical areas include geologic hazard areas, flood-prone areas, wetlands, and fish and wildlife habitat conservation areas (which include streams, riparian corridors, wildlife habitats mapped or designated by WDFW, corridors connecting priority habitats, and areas that support species of local importance)
	Shoreline Master Program	SMC 23.60A	Regulates activities in and near major water bodies (e.g., rivers, large lakes, marine waters), establishes requirements for maintaining native vegetation.
	Tree Protection Ordinance	SMC 25.11	Protects exceptional trees (i.e., trees or groups of trees that constitute an important community resource because of their unique historical, ecological, or aesthetic value), establishes requirements for replacing trees that are cut down, and requires a pre-construction survey to be conducted by a licensed arborist.
	Tree Planting, Green Factor, and Street Tree requirements	SMC Title 23, various sections	Requires planting of trees, landscaping, and other green infrastructure on private property and the right-of-way
	Clean Water Act	Section 401	Requires certification for any projects that may result in a discharge into waters of the United States to ensure that the discharge complies with applicable state water quality requirements.

EIS Topic	Applicable Regulation	Code Citation	Notes/Comments
	Clean Water Act	Section 404	Requires authorization for excavating, land clearing, or discharging dredged or fill material into waters of the United States, including wetlands
	Migratory Bird Treaty Act	16 U.S.C. 703-712	Prohibits the taking, killing, or possession of migratory birds or any parts, nests, or eggs of such birds, except as authorized by U.S. Fish and Wildlife Service (USFWS).
	Bald and Golden Eagle Protection Act	16 U.S.C. 668-668d	Prohibits the taking (including disturbance) of eagles or their nests, except as authorized by USFWS.
	Marine Mammal Protection Act	16 USC Ch. 31	Prohibits injury or harm (including disturbance) to marine mammals, except as authorized by National Marine Fisheries Service (NMFS).
	Endangered Species Act	Section 7 Consultation	Requires federal agencies to ensure that actions they authorize (e.g., through issuance of a permit), fund, or carry out are not likely to jeopardize the continued existence of any endangered or threatened species or result in the destruction or adverse modification of critical habitat for those species.
	Tree Canopy Cover Assessment		City program with goal of conducing citywide tree cover assessment every 5 years
Energy and Natural Resources			
	Washington State Energy Code	SMC Chapter 22.101 - Adoption of Construction Codes	Regulates the energy-use features of new and remodeled buildings. Seattle is planning to adopt the 2021 energy code in 2024.
	Seattle Energy Benchmarking Law	SMC 22.920	Building owners of each building subject to nonresidential benchmarking requirements shall provide to the Director energy benchmarking reports and, energy performance ratings for each subject building.
	The Seattle Building Tune-Ups Ordinance	SMC 22.930	Applies to all nonresidential buildings that are (1) equal to or larger than 50,000 square feet of floor area; and (2) are subject to Energy Benchmarking requirements. Once every five years, owners of buildings subject to this Chapter 22.930 are required to conduct a tune-up of building energy and water systems and submit a report to the City of findings, outcomes, and actions taken based on the tune-up.

EIS Topic	Applicable Regulation	Code Citation	Notes/Comments
	Building Emissions Performance Standards (BEPS)	Legislation	After two years of extensive stakeholder engagement and development of the policy by OSE and unanimous approval by City Council, Mayor Harrell signed the Building Emissions Performance Standard (BEPS) policy for existing commercial and multifamily buildings larger than 20,000 square feet into law on December 13, 2023.
Noise			
	City of Seattle Noise Control Ordinance	SMC Chapter 25.08	Sets exterior sound level limits between residential, commercial, and industrial uses.
Land Use Patterns and Urban Form / Relationship to Plans, Policies, and Regulations			
	Seattle Design Review Program	SMC Chapter 23.41	Addresses site design, access, frontage, landscaping, materials, appearance, etc. There are three types of Design Review. SDCI Design Review staff review many smaller buildings through Streamlined Design Review and Administrative Design Review. Larger buildings may require Full Design Review, which includes both public Design Review Board meetings and review by City staff. All Design Review includes an opportunity for public comment and involvement. Pursuant to HB 1293, the City is considering updates to the program. Some of the possible changes could include limiting projects to only one public meeting, streamlining the Design Review process to be quicker and less costly for applicants, and reducing the number of projects that are required to go through Design Review.
	Design Standards and Development Regulations	SMC Title 23, Subtitle III	Regulates land uses, scale, density, access, landscaping, signage, light and glare, views, parking and more.
	Streets Illustrated, Seattle's Right-of-Way Improvements Manual		The Right-of-Way Improvements Manual is intended to help property owners, developers, & architects involved with the design, permitting, & construction of Seattle's street right-of-way.

EIS Topic	Applicable Regulation	Code Citation	Notes/Comments
	Green Building Incentives	SMC Title 23	▪ Priority Green Expedited: Available for all new construction projects. Offers faster building permit review and processing for projects that meet green building requirements with a focus on clean energy, resource conservation, indoor air quality, and lead hazard reduction. ▪ Green Building Standard: Gives additional development capacity in specific zones in exchange for meeting green building requirements. ▪ Living Building Pilot Program: Offers additional height, floor area ratio (FAR), and Design Review departure requests for projects that meet aggressive energy and water requirements and Living Building Petal Certification. ▪ 2030 Challenge: Offers additional height, FAR, and Design Review departure requests for projects that meet the 2030 Challenge.
	Sustainable Buildings and Sites Policy		The Policy sets the following goals for City-owned properties: ▪ New construction and major renovations 5,000 ft2 or greater must meet LEED Gold as well as key performance requirements for energy and water efficiency, waste diversion, and bicycle facilities. ▪ Tenant Improvements 5,000 ft2 or greater with a scope of work that includes mechanical, electrical, and plumbing must meet LEED Gold as well as water efficiency and waste diversion requirements. ▪ Small projects—either new construction, renovations, or tenant improvements—are to utilize Capital GREEN, a green design and construction evaluation tool developed by FAS, in project planning and development. ▪ All new and existing sites projects shall follow best management practices.

EIS Topic	Applicable Regulation	Code Citation	Notes/Comments
Population, Housing, and Employment			
	Mandatory Housing Affordability (MHA) Program	Chapter 23.58c	Implement an affordable housing incentive program authorized by RCW 36.70A.540. To achieve the goal of providing affordable housing in Seattle, development subject to the MHA requirements must contribute to affordable housing as part of most commercial, residential, or live-work projects. This contribution can be provided by including affordable housing units within new development (performance option) or paying into a fund that will support the development of affordable housing (payment option).
	Multifamily Housing Property Tax Exemption Program	Chapter 5.72	The Multifamily Property Tax Exemption (MFTE) Program provides a tax exemption on eligible multifamily housing in exchange for income- and rent-restricted units. By supporting mixed-income residential development in the urban centers, the MFTE program ensures affordability as the community grows.
	Seattle Housing Levy (SHL)	SHL Program	Helps fund the production and protection of affordable units. Voters approved the $970 Million Housing Levy renewal in 2023. 2023 Levy Fact Sheet.
	Rental Housing Program		The Rental Housing Program funds the development of affordable rental housing in Seattle using local funds such as the Seattle Housing Levy, federal funds, and other fund sources.
	Homeownership Program		The Office of Housing provides downpayment assistance to first-time homebuyers at or below 80% of area median income through partnerships with local nonprofits and lending institutions.
	Home Repair Program		The Home Repair Loan Program provides affordable loans to income-qualified homeowners to address critical health, safety, and structural issues. The program is designed for owner-occupied single family homes with low- to moderate-income households.
	The Weatherization Program		The HomeWise Weatherization Program provides free energy efficiency improvements to qualified homes. The Office of Housing's weatherization program has different income eligibility thresholds depending on the heat source (i.e. electricity, gas, or oil) and whether the housing is renter- or owner-occupied. 2023 Income Limits.

EIS Topic	Applicable Regulation	Code Citation	Notes/Comments
	Just Cause Eviction Ordinance	▪ SMC 22.205 - Seattle Just Cause Eviction Ordinance ▪ RCW 59.18.200; SMC 7.24.030 - Renewal of Term Leases	The Just Cause Eviction Ordinance, passed in 1980, prevents landlords from arbitrarily ending a rental agreement. As of July 2021, landlords must offer tenants in expiring term leases a renewal unless they have a just cause reason not to renew the tenancy. Notice must be issued 60 to 90 days prior to the expiration of the tenancy.
	The Tenant Relocation Assistance Ordinance (TRAO)	Tenant Relocation Assistance Ordinance, SMC 22.210.	The Tenant Relocation Assistance Ordinance has two primary benefits for renters being displaced by development: ▪ Provide relocation assistance to low-income households ▪ Provide all households with adequate time to search for new housing and move
	Economic Displacement Relocation Assistance (EDRA)	Ord 126451	Applies to any housing cost increase totaling 10% or more within the same 12 month period. Tenant households earning 80% or less of Seattle's average median income (AMI) that give notice to vacate after receipt of a 10% or more increase will be eligible to apply for financial assistance.
	Washington State Residential Landlord-Tenant Act	RCW 59.18	Establishes rights and responsibilities for tenants and landlords
	Equitable Development Initiative (EDI)		$9.5 million in awards to multiple Equitable Development Initiative (EDI) partners to support property ownership among Seattle's diverse communities in neighborhoods at high risk of displacement. The EDI funding is intended to support community organizations for site acquisition and major capital projects, as well as capacity-building support to organizations that are still developing their plans for permanent homes in Seattle.
	King County Property Tax Relief		Provides property tax exemptions and deferrals for low-income, senior, and disabled property owners to help them remain in place.

EIS Topic	Applicable Regulation	Code Citation	Notes/Comments
Cultural Resources			
	City of Seattle Historic Preservation Program	SMC 25.12 through 25.30	Designates, preserves, protects, and enhances sites, improvements and objects which reflect significant elements of the City's cultural, aesthetic, social, economic, political, architectural, engineering, historic or other heritage. Protections of designated landmarks are provided by design review of proposed alterations and the issuance of a Certificate of Approval (SMC 25.12). Owners of properties that have received Seattle Landmark designation may take advantage of City incentives including a Special Tax Valuation, Zoning Code Relief, Building Code Relief, and special incentives for downtown landmarks, such as the transfer of development rights (TDR).
	Washington Executive 21-02		Washington Executive 21-02 (formerly 05-05) requires that impacts to cultural resources must be considered as part of any state-funded project or investment and must include consultation with DAHP and with Tribal governments.
	Washington State Archaeological Sites and Resources Protection Act	RCW 27.53	Requires a permit to excavate or remove any archaeological resource located on public or Tribal lands.
	Registration of Historic Archaeological Resources on State-Owned Aquatic Lands	25-46 WAC	Establishes registration procedures for previously unreported historic archaeological resources discovered on, in, or under state-owned aquatic lands as provided for in chapter 27.53 RCW.
	National Historic Preservation Act (NHPA)	36 CFR Part 800	Commonly referred to as Section 106. Has implementing regulations (36 CFR Part 800), that require federal agencies (or others who have received federal grants or funds, or a federal permit or license) to take into account the effects of their undertakings on historic properties, by identifying historic properties, assessing adverse effects, and resolving those adverse effects.
	Archaeological Resources Protection Act (ARPA)		Protects archaeological resources.
	National American Graves Protection and Repatriation Act (NAGPRA)		Creates protections for Native American burial sites, remains, and cultural objects.
	The National Environmental Protection Act		Requires federal agencies to assess whether a major federal action has the potential to significantly affect the human environment prior to making decisions. This is done through the preparation of an Environmental Assessment (EA) or an EIS.

EIS Topic	Applicable Regulation	Code Citation	Notes/Comments
	Cultural Space Agency		Program to help cultural organizations purchase space so they can remain in their communities.
Transportation			
	Transportation Impact Mitigation	SMC 23.52, subchapter 2	Requires impact analysis and mitigation for projects meeting certain standards.
	Transportation Concurrency	SMC 23.52, subchapter 1	Implements GMA policy that transportation improvements or strategies should be made concurrently with land development
	Commuter Benefit Ordinance	SMC 14.30	Businesses with 20 or more employees are required to offer their employees the opportunity to make a monthly pre-tax payroll deduction for transit or vanpool expenses.
	Commute Trip Reduction	Chapter 25.02 - Commute Trip Reduction	An employer of 100+ employees who report to work at a single site between 6 - 9 a.m. must: ▪ Appoint and maintain an individual to act as an Employee Transportation Coordinator. ▪ Submit a program report to the City for review and approval once every two years. ▪ Exercise a good faith effort by collaborating with the City in its administration and implementation of the law. ▪ Conduct a commuter survey once every two years to measure employees' drive alone rates.
	Pedestrian and Bicycle System Improvements		Capital list with protected bike lane projects funded through the end of the Levy to Move Seattle. Seattle is also building Neighborhood Greenways and Healthy Streets.

EIS Topic	Applicable Regulation	Code Citation	Notes/Comments
	Transportation systems management and operations (TSMO) maximizes efficiency of the existing multimodal transportation system by implementing low-cost, near-term improvements to improve overall system performance. TSMO solutions can improve safety and provide flexibility to address changing conditions. Strategies can also prioritize movement of specific modes, including freight, transit, and active transportation. Many of these strategies would require coordination with partner agencies, such as Port of Seattle, King County Metro, and Sound Transit.		Seattle already utilizes some TSMO strategies to reduce traffic congestion and improve vehicle flow, including providing drivers with updated travel information and managing the flow of traffic through intersections. SDOT has an ongoing effort to improve the operations of traffic signals, including some corridors with adaptive signal control, which coordinates signal timing changes in response to real-time traffic volume data in order to reduce traffic congestion and improve vehicular flow. Additionally, Seattle's Transit Master Plan, Freight Master Plan, and Seattle Industrial Areas Freight Access Project identify speed and reliability improvements, such as transit and/or freight lanes that could improve mobility for those modes. Expanding existing programs or implementing new TSMO strategies, in coordination with regional partners, could help mitigate impacts to corridor travel time, screenlines, intersection LOS in the NE 130th/NE 145th Street Subarea, and state facilities by increasing efficiency of the existing system.
	Transportation Demand Management (TDM)		Transportation demand management (TDM) strategies can help reduce congestion and travel time impacts by reducing demand for automobile travel and supporting travel by other modes. Seattle currently promotes a variety of TDM strategies to encourage travel by carpooling, vanpooling, transit, walking, and biking, as well as reducing trips by teleworking. These include the Commute Trip Reduction (CTR) Program, Transportation Management Programs (TMPs), and the Commuter Benefits Ordinance which are described above along with additional measures Seattle could consider adding to its programmatic TDM efforts.
	Transportation Management Program		The City works with building managers and managers to help implement strategies that facilitate tenants' use of a full range of travel options, including transit, walking, carpooling, and bicycling. Successful Transportation Management Programs (TMPs) provide transit use incentives, promote active commutes, and include parking management strategies.
	Metro Connects		King County Metro's vision for providing more service, more choices and one easy-to-use system over a 30 year period

EIS Topic	Applicable Regulation	Code Citation	Notes/Comments
	Washington State Department of Transportation Development Services		Reviews development projects for potential impacts to state transportation facilities
	Washington State Ferries		Reviews development projects for potential impacts to the state ferry system
Public Services			
	Crime Prevention Coordinators		SPD has Crime Prevention Coordinators (CPCs) who are experts in crime prevention techniques. SPD also advises on natural surveillance and other techniques to provide design of development and landscaping that allows for visibility and increase safety.
	Micro Community Policing Plans		SPD has developed Micro Community Policing Plans (MCPP) with community engagement and considering crime data to help direct police services to address the individual needs of each community.
	Seattle Fire Protection Systems Code	Seattle Building Code Section 9	Regulates Fire Protection Systems.
	Seattle Land Use Code	Title 23 SMC 23.60A	▪ The Seattle Land Use Code contains development regulations, including standards governing the design and placement of exterior site and building illumination and recreation/open space. The LUC also provides for SPR review when subdivisions over a certain size are proposed. ▪ The Seattle Shoreline Master Program requires shoreline public access for development that creates a demand.
	Seattle Solid Waste, Solid Waste Management Planning		Seattle Solid Waste develops a Solid Waste Management Plan at consistent intervals to ensure that departmental policies align with their stated goals. The most recent draft update to this plan commits to a zero-waste vision in which Seattleites produce and use less to ensure reduced impacts to human health and the environment.
	Seattle Public Utilities Strategic Business Plan		Seattle Public Utilities also produces strategic business plans every 5 years which include solid waste elements and ways in which SPU can support the Solid Waste Division through investments to reach its stated goals from the Solid Waste Management Plan.

EIS Topic	Applicable Regulation	Code Citation	Notes/Comments
Utilities[2]			
	Water Code	SMC Title 21, Subtitle I	Water Rates and Regulations
	Building and Construction Codes	SMC Title 22	Includes plumbing and fire codes
	City of Seattle Standards and Specifications	Standard Specifications for Road, Bridge, and Municipal Construction (2020)	The 2020 Standard Specifications apply whenever any public or private construction is performed within the Rights-of-Way of the City of Seattle, including work performed by private parties at their own expense under authority granted by ordinance of the City Council or by permit from the Seattle Department of Transportation's Street Use section.
	Washington State Department of Health	WAC Title 246	Public Water Systems. See Chapters 290-296.

[2] Authority for requiring utility improvements and using building features that reduce demand for utilities is identified in rules, codes and policies and are applied during permitting reviews. These include construction codes including the Building Code, Electrical Code, Energy Code, Fuel Gas Code; Plumbing Code, and the Stormwater Code, and rules promulgated by City/County Planning and Public Utilities departments, including water, sewer, storm drain & electrical system improvements.

D Air Quality & GHG Appendix

Seattle Comprehensive Plan
On-Road Emissions Summary

Existing

MT=Metric Ton

	VOC	CO	NOX	PM10 Exhaust	PM10 BWTW	Total PM10	PM2.5 Exhaust	PM2.5 BWTW	Total PM2.5	SO2	MTCO2e
					Tons/Year						
Cars	276.2	1,760.4	109.8	1.6	0.0	1.7	1.4	0.0	1.5	1.4	14,761.0
Trucks	7.4	38.7	6.2	1.1	0.0	1.1	0.9	0.0	1.0	0.1	8,344.4
Buses	0.5	5.2	0.7	1.1	0.0	1.1	0.9	0.0	0.9	0.0	7,964.4
Total	**284.0**	**1,804.2**	**116.7**	**3.8**	**0.1**	**3.8**	**3.3**	**0.0**	**3.3**	**1.5**	**31,069.8**

Alternative 1

	VOC	CO	NOX	PM10 Exhaust	PM10 BWTW	Total PM10	PM2.5 Exhaust	PM2.5 BWTW	Total PM2.5	SO2	MTCO2e
					Tons/Year						
Cars	151.6	642.0	48.7	4.6	0.1	4.7	4.1	0.0	4.1	0.2	28,553.9
Trucks	5.3	15.3	6.7	0.1	0.0	0.1	0.1	0.0	0.1	0.0	763.0
Buses	0.4	2.3	1.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	91.3
Total	**157.3**	**659.6**	**56.4**	**4.7**	**0.1**	**4.8**	**4.2**	**0.0**	**4.2**	**0.2**	**29,408.2**

Alternative 2

	VOC	CO	NOX	PM10 Exhaust	PM10 BWTW	Total PM10	PM2.5 Exhaust	PM2.5 BWTW	Total PM2.5	SO2	MTCO2e
					Tons/Year						
Cars	156.0	660.5	50.1	4.8	0.1	4.8	4.2	0.0	4.2	0.2	29,374.1
Trucks	5.3	15.4	6.7	0.1	0.0	0.1	0.1	0.0	0.1	0.0	770.0
Buses	0.4	2.3	1.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	91.3
Total	**161.7**	**678.2**	**57.8**	**4.9**	**0.1**	**4.9**	**4.3**	**0.0**	**4.3**	**0.2**	**30,235.5**

Alternative 3

	VOC	CO	NOX	PM10 Exhaust	PM10 BWTW	Total PM10	PM2.5 Exhaust	PM2.5 BWTW	Total PM2.5	SO2	MTCO2e
					Tons/Year						
Cars	156.0	660.5	50.1	4.8	0.1	4.8	4.2	0.0	4.2	0.2	29,371.3
Trucks	5.3	15.4	6.7	0.1	0.0	0.1	0.1	0.0	0.1	0.0	772.2
Buses	0.4	2.3	1.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	91.3
Total	**161.7**	**678.2**	**57.8**	**4.9**	**0.1**	**4.9**	**4.3**	**0.0**	**4.3**	**0.2**	**30,234.8**

Alternative 5

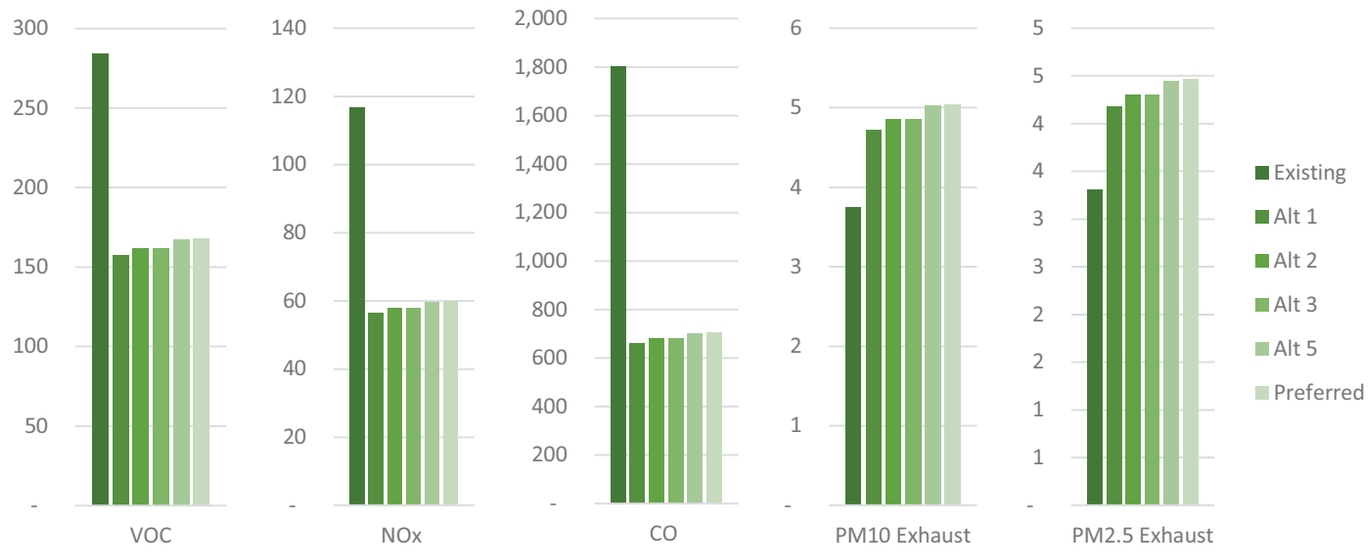
	VOC	CO	NOX	PM10 Exhaust	PM10 BWTW	Total PM10	PM2.5 Exhaust	PM2.5 BWTW	Total PM2.5	SO2	MTCO2e
					Tons/Year						
Cars	161.4	683.1	51.9	4.9	0.1	5.0	4.4	0.0	4.4	0.2	30,375.3
Trucks	5.4	15.6	6.8	0.1	0.0	0.1	0.1	0.0	0.1	0.0	779.3
Buses	0.4	2.3	1.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	91.3
Total	**167.1**	**701.0**	**59.6**	**5.0**	**0.1**	**5.1**	**4.5**	**0.0**	**4.5**	**0.2**	**31,245.9**

Transportation-Related Criteria Pollutant Emissions (Tons/Year)

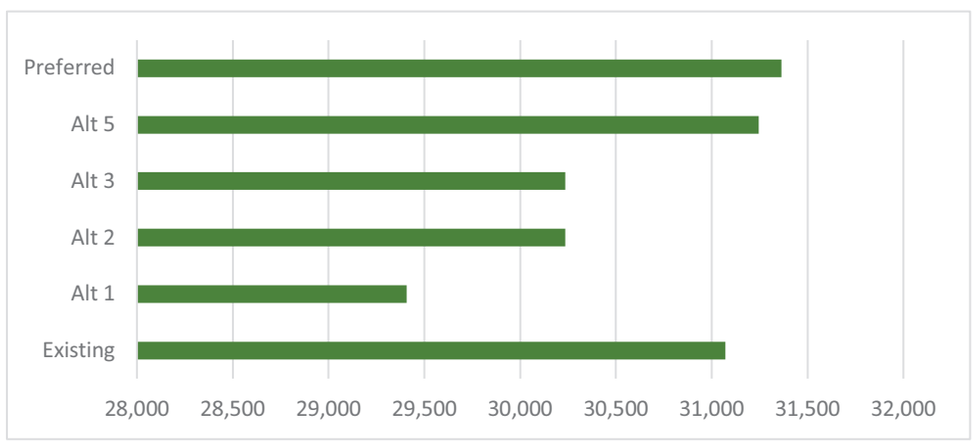
	VOC	CO	NOx	PM10 Exhaust	PM2.5 Exhaust	SO2
Existing	284	1,804	117	4	3	2
Alt 1	157	660	56	5	4	0
Alt 2	162	678	58	5	4	0
Alt 3	162	678	58	5	4	0
Alt 5	167	701	60	5	4	0
Preferred	168	704	60	5	4	0

Road Transportation Emissions (MTCO2e)

	Existing	Alt 1	Alt 2	Alt 3	Alt 5	Preferred
Cars	14,761	28,554	29,374	29,371	30,375	30,489
Trucks	8,344	763	770	772	779	782
Buses	7,964	91	91	91	91	92
Total	**31,070**	**29,408**	**30,235**	**30,235**	**31,246**	**31,363**
		(1,662)	(834)	(835)	176	294



Transportation Exhaust Criteria Pollutant Emissions (Tons/yr)



Road Transportation GHG Emissions (MTCO2e/yr)

Seattle Comprehensive Plan
Operational GHG Emissions

Existing			
	Transportation	31,070	
Alternative 1			
	Transportation	29,408	(1,662)
	Building Energy**	372,474	
	Waste	60,834	
	Total Emissions		431,647
	Growth (population)		164,000
	per capita MTCO2e		2.63
Alternative 2			
	Transportation	30,235	(834)
	Building Energy**	388,378	
	Waste	64,053	
	Total Emissions		451,597
	Growth (population)		205,000
	per capita MTCO2e		2.20
Alternative 3			
	Transportation	30,235	(835.0)
	Building Energy**	391,736	
	Waste	64,294	
	Total Emissions		455,196
	Growth (population)		205,000
	per capita MTCO2e		2.22
Alternative 4 *			
	Transportation	30,235	(835.0)
	Building Energy**	389,644	
	Waste	64,294	
	Total Emissions		453,104
	Growth (population)		205,000
	per capita MTCO2e		2.21
Alternative 5			
	Transportation	31,246	176
	Building Energy**	406,041	
	Waste	67,917	
	Total Emissions		474,134
	Growth (population)		246,000
	per capita MTCO2e		1.93
Preferred Alternative			
	Transportation***	31,363	294
	Building Energy	415,152	
	Waste	69,683	
	Total Emissions		485,128
	Growth (population)		246,000
	per capita MTCO2e		1.97

** Traffic data is not available for Alternative 4 because the projected VMT would fall between Alternative 2 and Alternative 3. For purposes of the analysis, it has been assumed that Alternative 4 VMT is equivalent to Alternative 2, which is higher than Alternative 3.*

*** The 2018 Seattle Energy Code requires all-electric space and water heating. GHG emissions were estimated assuming natural gas consumption for purposes other than space and water heating (13% [U.S. EIA, 2015]). Due to the passing of I-2066, natural gas bans are prohibited. Therefore, GHG emissions have been increased and adjusted to assume no restrictions on natural gas for new development*

**** Growth targets under Alternative 5 and the Preferred Alternative would be the same. The difference in the allocation of growth results in differing trip patterns and VMT. VMT under the Preferred Alternative would be approximately 0.38% greater than Alternative 5. Preferred Alternative emissions have been estimated by increasing Alternative 5 emissions by 0.38%.*

Seattle Comprehensive Plan
On-Road Transportation Fuel

Existing

	Cars	*Trucks*	*Buses*	*Million BTU*	*trillion Btu*
Gasoline	345,397	1,562	125	347,084	0.3471
Diesel	8,074	5,323	752	14,149	0.0141
CNG	-	63	53	116	0.0001
Ethanol (E-85)	621	-	-	621	0.0006
Total Fuel Use				361,969	
Trillion BTU/Capita				0.45	

Washington State Fuel Usage in 2020

	Trillion Btu
gasoline	258.20
Diesel	150.00
NG	0.01
ethanol	20.30

* US EIA, 2020

Alternative 1

	Cars	*Trucks*	*Buses*	*Million BTU*	*trillion Btu*	*% of state*
Gasoline	336,191	1,774	127	338,092	0.3381	0.131%
Diesel	13,508	5,938	783	20,230	0.0202	0.013%
CNG	-	111	50	161	0.0002	1.606%
Ethanol (E-85)	631	-	-	631	0.0006	0.003%
				359,113		
				2.19		

Alternative 2

	Cars	*Trucks*	*Buses*	*Million BTU*	*trillion Btu*	*% of state*
Gasoline	345,844	1,791	127	347,762	0.3478	0.135%
Diesel	13,895	5,993	784	20,672	0.0207	0.014%
CNG	-	112	50	162	0.0002	1.617%
Ethanol (E-85)	649	-	-	649	0.0006	0.003%
				369,245		
				1.80		

Alternative 3

	Cars	*Trucks*	*Buses*	*Million BTU*	*trillion Btu*	*% of state*
Gasoline	345,809	1,796	127	347,732	0.3477	0.135%
Diesel	13,893	6,016	784	20,692	0.0207	0.014%
CNG	-	113	50	162	0.0002	1.622%
Ethanol (E-85)	649	-	-	649	0.0006	0.003%
				369,235		
				1.80		

Alternative 5

	Cars	*Trucks*	*Buses*	*Million BTU*	*trillion Btu*	*% of state*
Gasoline	357,628	1,812	127	359,567	0.3596	0.139%
Diesel	14,368	6,067	784	21,219	0.0212	0.014%
CNG	-	113	50	163	0.0002	1.631%
Ethanol (E-85)	671	-	-	671	0.0007	0.003%

Preferred Alternative

	Cars	*Trucks*	*Buses*	*Million BTU*	*trillion Btu*	*% of state*
Gasoline	358,972	1,819	127	360,919	0.3609	0.140%
Diesel	14,422	6,090	787	21,298	0.0213	0.014%
CNG	-	114	50	164	0.0002	1.637%
Ethanol (E-85)	673	-	-	673	0.0007	0.003%
				383,054		
				1.56		

* Fuel use based on MOVES model outputs.
VMT for Alternative 4 not provided. Growth and VMT assumptions consistent with Alternative 2 and 3

Net increase in fuel consumption compared to Existing

	Alt 1	**Alt 2**	**Alt 3**	**Alt 4**	**Alt 5**	**Preferred**
Gasoline	-0.0090	0.0007	0.0006	0.0007	0.0125	0.0138
Diesel	0.0061	0.0065	0.0065	0.0065	0.0071	0.0071
CNG	0.00004	0.00005	0.00005	0.00005	0.00005	0.00005
Ethanol (E-85)	-0.0013	-0.0013	-0.0013	-0.0013	-0.0013	-0.0013

	Alt 1	**Alt 2**	**Alt 3**	**Alt 4**	**Alt 5**	**Preferred**
Gasoline	-0.003%	0.000%	0.000%	0.000%	0.0048%	0.0054%
Diesel	0.004%	0.004%	0.004%	0.004%	0.0047%	0.0048%
CNG	0.448%	0.459%	0.464%	0.459%	0.4734%	0.4795%
Ethanol (E-85)	-0.006%	-0.006%	-0.006%	-0.006%	-0.0064%	-0.0064%

Seattle Comprehensive Plan
Electricity Consumption

2022 State of Washington

Electricity	310	trillion btu
Natural Gas	351	trillion btu

RESIDENTIAL

	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5	Preferred
Target Housing Growth (dwelling units)						
Single Family	1,389	698	1,111	1,111	1,111	4,132
Townhome	648	533	4,260	1,578	1,128	14,766
Multi-family Low Rise	2,593	1,977	14,247	5,522	4,056	6,675
Multi-family Mid Rise	75,370	96,792	80,382	91,789	113,705	94,427
Million Btu	1,285,659	1,581,937	1,644,496	1,605,522	1,910,979	2,080,703
Trillion Btu	1.29	1.58	1.64	1.61	1.91	2.08
percent of state	0.41%	0.51%	0.53%	0.52%	0.62%	0.67%

Station Area

	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5	Preferred
units	840	2,208			2,703	2,703
million btu	14,868	39,082			42,167	42,167
trillion btu	0.01	0.04			0.04	0.04
percent of state	0.0048%	0.0126%			0.0136%	0.0136%

COMMERCIAL

	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5	Preferred*
Target Commercial Growth(SF)	33,174,904	33,174,904	33,174,904	33,174,904	33,174,845	33,174,845
Estimated Electricity Demand (kBtu)	1,562,537,978	1,562,537,978	1,562,537,978	1,562,537,978	1,562,535,200	1,562,535,200
Million Btu	1,562,538	1,562,538	1,562,538	1,562,538	1,562,535	1,562,535
Trillion Btu	1.56	1.56	1.56	1.56	1.56	1.56
percent of state	0.50%	0.50%	0.50%	0.50%	0.50%	0.50%

Station Area

	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5	Preferred*
SF	178,948	244,963			251,033	164,500
Estimated Electricity Demand (kBtu)	8,428,451	11,537,757			11,823,654	7,747,950
million btu	8,428	11,538			11,824	7,748
trillion btu	0.008	0.012			0.012	0.008
percent of state	0.0027%	0.0037%			0.0038%	0.0025%

INDUSTRIAL

	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5	Preferred*
Target Industrial Growth(SF)	17,710,268	17,710,268	17,710,268	17,710,268	17,710,246	17,710,246
Estimated Electricity Demand (kBtu)	368,373,574	368,373,574	368,373,574	368,373,574	368,373,117	368,373,117
Million Btu	368,374	368,374	368,374	368,374	368,373	368,373
Trillion Btu	0.37	0.37	0.37	0.37	0.37	0.37
percent of state	0.12%	0.12%	0.12%	0.12%	0.12%	0.12%

TOTAL Energy (trillion Btu)	3.22	3.51	3.58	3.54	3.84	4.01
percent of state	1.04%	1.13%	1.15%	1.14%	1.24%	1.29%
Station Area	0.02	0.05	NA	NA	0.054	0.050
	0.008%	0.016%	NA	NA	0.017%	0.016%

Washington State Consumption Rates

Commercial Energy Consumption Rates

Electricty	47.1	kBtu/SF
NG	16.6	kBtu/SF

Source: Average Energy Use Intensity: Seattle Open Data, 2020 Building Energy Benchmarking
https://data.seattle.gov/dataset/2020-Building-Energy-Benchmarking/auez-gz8p/data

Industrial Energy Consumption Rates

Electricty	20.8	kBtu/SF
NG	10.4	kBtu/SF

Source: Average Energy Use Intensity: Seattle Open Data, 2020 Building Energy Benchmarking
https://data.seattle.gov/dataset/2020-Building-Energy-Benchmarking/auez-gz8p/data

Seattle Comprehensive Plan
Residential Electricity Consumption

2022 State of Washington

Electricity	310	trillion btu
Natural Gas	351	trillion btu

RESIDENTIAL

	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5	Preferred
Target Housing Growth (dwelling units)						
Single Family	1,389	698	1,111	1,111	1,111	4,132
Townhome	648	533	4,260	1,578	1,128	14,766
Multi-family Low Rise	2,593	1,977	14,247	5,522	4,056	6,675
Multi-family Mid Rise	75,370	96,792	80,382	91,789	113,705	94,427
Million Btu	1,285,659	1,581,937	1,644,496	1,605,522	1,910,979	2,080,703
Trillion Btu	1.29	1.58	1.64	1.61	1.91	2.08
percent of state	0.41%	0.51%	0.53%	0.52%	0.62%	0.67%

Station Area

	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5	Preferred
units	840	2,208			2,703	2,703
million btu	14,868	39,082			42,167	42,167
trillion btu	0.01	0.04			0.04	0.04
percent of state	0.0048%	0.0126%			0.0136%	0.0136%

	Electricity mbtu/unit	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Preferred
Single Family	35.2	1389	698	1111	1111	1111	4132
multifamily low rise	17.7	2593	1977	14247	5522	4056	6675
Townhome	23.3	648	533	4260	1578	1128	14766
multi family mid rise	15.6	75370	96792	80382	91789	113705	94427
		80000	100000	100000	100000	120000	120000

EIA, CE4.10 Annual Household site end-use consumption by fuel in the West - averages, 2015
https://www.eia.gov/consumption/residential/data/2015/index.php?view=consumption#by%20End%20uses%20by%20fuel

Seattle Comprehensive Plan
Natural Gas Consumption

2022 State of Washington

Electricity	310 trillion btu
Natural Gas	351 trillion btu

RESIDENTIAL

	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5	Preferred
Target Housing Growth (dwelling units)						
Single Family	1,389	698	1,111	1,111	1,111	4,132
Townhome	648	533	4,260	1,578	1,128	6,675
Multi-family Low Rise	2,593	1,977	14,247	5,522	4,056	14,766
Multi-family Mid Rise	75,370	96,792	80,382	91,789	113,705	94,427
Million Btu	1,285,659	1,581,937	1,644,496	1,605,522	1,910,979	2,035,393
Trillion Btu	1.29	1.58	1.64	1.61	1.91	2.04
percent of state	0.37%	0.45%	0.47%	0.46%	0.54%	0.58%

Station Area

	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5	Preferred
units	840	2,208	-	-	2,703	2,703
million btu	14,868	39,082	-	-	42,167	42,167
trillion btu	0.01	0.04	-	-	0.04	0.04
percent of state	0.0042%	0.0111%			0.0120%	0.0120%

COMMERCIAL

	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5	Preferred*
Target Commercial Growth(SF)	33,174,904	33,174,904	33,174,904	33,174,904	33,174,845	33,174,845
Estimated NG Demand (kBtu)	550,703,406	550,703,406	550,703,406	550,703,406	550,702,427	550,702,427
Million Btu	550,703	550,703	550,703	550,703	550,702	550,702
Trillion Btu	0.55	0.55	0.55	0.55	0.55	0.55
	0.18%	0.18%	0.18%	0.18%	0.18%	0.18%

Station Area

	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5	Preferred*
SF	178,948	244,963			251,033	164,500
Estimated NG Demand (kBtu)	2,970,537	4,066,386			4,167,148	2,730,700
million btu	2,971	4,066			4,167	2,731
trillion btu	0.0030	0.0041			0.0042	0.0027
percent of state	0.0002%	0.0002%			0.0002%	0.0002%

INDUSTRIAL

	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5	Preferred*
Target Industrial Growth(SF)	17,710,268	17,710,268	17,710,268	17,710,268	17,710,246	17,710,246
Estimated NG Demand (kBtu)	184,186,787	184,186,787	184,186,787	184,186,787	184,186,558	184,186,558
Million Btu	184,187	184,187	184,187	184,187	184,187	184,187
Trillion Btu	0.18	0.18	0.18	0.18	0.18	0.18
percent of state	0.06%	0.06%	0.06%	0.06%	0.06%	0.06%
TOTAL Energy (trillion Btu)	2.02	2.32	2.38	2.34	2.65	2.77
percent of state	0.58%	0.66%	0.68%	0.67%	0.75%	0.79%
Station Area	0.018	0.043			0.046	0.045
	0.005%	0.012%			0.013%	0.013%

Washington State Consumption Rates

Commercial Energy Consumption Rates

Electricty	47.1	kBtu/SF
NG	16.6	kBtu/SF

Source: Average Energy Use Intensity: Seattle Open Data, 2020 Building Energy Benchmarking
https://data.seattle.gov/dataset/2020-Building-Energy-Benchmarking/auez-gz8p/data

Industrial Energy Consumption Rates

Electricty	20.8	kBtu/SF
NG	10.4	kBtu/SF

Source: Average Energy Use Intensity: Seattle Open Data, 2020 Building Energy Benchmarking
https://data.seattle.gov/dataset/2020-Building-Energy-Benchmarking/auez-gz8p/data

Seattle Comprehensive Plan
Residential Natural Gas Consumption

2022 State of Washington

Electricity	310	trillion btu
Natural Gas	351	trillion btu

RESIDENTIAL

	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5	Preferred
Target Housing Growth (dwelling units)						
Single Family	1,389	698	1,111	1,111	1,111	4,132
Townhome	648	533	4,260	1,578	1,128	6,675
Multi-family Low Rise	2,593	1,977	14,247	5,522	4,056	14,766
Multi-family Mid Rise	75,370	96,792	80,382	91,789	113,705	94,427
Million Btu	1,285,659	1,581,937	1,644,496	1,605,522	1,910,979	2,035,393
Trillion Btu	1.29	1.58	1.64	1.61	1.91	2.04
percent of state	0.37%	0.45%	0.47%	0.46%	0.54%	0.58%

Station Area

	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5	Preferred
units	840	2,208			2,703	2,703
million btu	14,868	39,082			42,167	42,167
trillion btu	0.01	0.04			0.04	0.04
percent of state	0.0042%	0.0111%			0.0120%	0.0120%

	NG mbtu/unit	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Preferred	Kbtu
Single Family	35.2	1389	698	1111	1111	1111	4132	35200
multifamily low rise	17.7	2593	1977	14247	5522	4056	6675	17700
Townhome	23.3	648	533	4260	1578	1128	14766	23300
multi family mid rise	15.6	75370	96792	80382	91789	113705	94427	15600
		80000	100000	100000	100000	120000	120000	

EIA, CE4.10 Annual Household site end-use consumption by fuel in the West - averages, 2015
https://www.eia.gov/consumption/residential/data/2015/index.php?view=consumption#by%20End%20uses%20by%20fuel

Seattle Comprehensive Plan
Solid Waste Assumptions

	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Preferred
Solid waste						
Single Family Residential (tons/year)	2,115	1,063	1,692	1,692	1,692	6,292
MultiFamily Residential (tons/year)	28,310	35,762	35,613	35,613	42,816	41,728
jobs (tons/year)	90,542	90,542	90,542	90,542	90,542	90,542
CAP	*70*	*% diversion rate*				
Single Family (tons/year)	2,115	1,063	1,692	1,692	1,692	6,292
multifamily low rise (tons/year)	934	712	5,131	1,989	1,461	2,404
Townhome (tons/year)	233	192	1,534	568	406	5,318
multi family mid rise (tons/year)	27,143	34,858	28,948	33,056	40,949	34,006
Commercial (tons/year)	76,044	76,044	76,044	76,044	76,044	76,044
Industrial (tons/year)	14,498	14,498	14,498	14,498	14,498	14,498

Notes:

Employment Waste

3.14 lbs/day
0.57305 tons/year

Residential Waste

	Total Generated Tons (2020)	Housing units (2020 Census)	tons/DU/year
Single Family	232038	152380.404	1.522754855
Multi-Family	83701	232418.596	0.360130392

Source: Seattle Public Utilities, City of Seattle 2022 Solid Waste Plan Update: Moving Upstream to

Seattle Comprehensive Plan
Housing Type Assumptions

Unit Type	CalEEMod Unit Type	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Preferred
Single Family	Single Family	1389	698	1111	1111	1111	4132
Small ADU	Multifamily low rise	2593	1977	14247	5522	4056	6675
Townhome	Townhome	648	533	4260	1578	1128	14766
Multi family	Multi family mid rise	75370	96792	80382	91789	113705	94427
		80000	100000	100000	100000	120000	120000

	Analysis Zone 1					Analysis Zone 2					Analysis Zone 3					Analysis Zone 4					Analysis Zone 5					Analysis Zone 6					Analysis Zone 7					Analysis Zone 8					Total			
Alternative 1	HU Capacity	HU Target	Jobs Capacity	Jobs Target		HU Capacity	HU Target	Jobs Capacity	Jobs Target		HU Capacity	HU Target	Jobs Capacity	Jobs Target		HU Capacity	HU Target	Jobs Capacity	Jobs Target		HU Capacity	HU Target	Jobs Capacity	Jobs Target		HU Capacity	HU Target	Jobs Capacity	Jobs Target		HU Capacity	HU Target	Jobs Capacity	Jobs Target		HU Capacity	HU Target	Jobs Capacity	Jobs Target		HU Capacity	HU Target	Jobs Capacity	Jobs Target
Urban Centers	-	-	-	-	-	14,654	6,049	19,048	6,740	-	4,290	3,595	12,017	2,646		26,610	18,265	91,768	90,214		11,536	9,061	3,359	3,359		-	-	-	-		-	-	-	-		-	-	-	-		-	-	-	-		57,090	36,970	126,192	102,959
Hub Urban Villages	16,404	7,588	28,714	6,504	-	4,159	927	2,216	622	-	-	-	-	-		-	-	-	-		-	-	-	-		4,004	3,128	1,597	1,597		-	-	-	-		10,128	1,242	15,699	3,053		34,695	12,885	48,226	11,776
Residential Urban Villages	12,708	3,822	5,090	2,020	-	2,188	1,466	936	366	-	638	402	289	283		1,314	1,010	613	281		5,309	3,193	2,751	1,067		5,792	1,143	2,081	897		1,156	259	2,116	450		11,961	3,469	4,729	2,373		41,066	14,764	18,605	7,735
Manufacturing Industrial Centers	-	-	-	-		-	-	-	-		542	628	4,064	6,100		-	-	-	-		-	-	-	-		-	-	-	-		2,086	848	17,070	12,700		-	-	-	-		2,628	1,476	21,134	18,800
Growth Area (Maritime Industrial)	-	-	-	-		-	-	-	-		-	-	-	-		-	-	-	-		148	144	90	-		-	-	-	-		535	392	317	-		-	-	-	-		827	676	488	-
Outside Subareas (This Alternative)	2,386	1,040	2,307	1,377	-	4,602	2,006	2,305	1,376	-	1,224	534	749	447		-	-	-	-		1,308	570	171	102		2,809	1,225	1,720	1,027		386	168	690	412		2,181	951	3,475	2,075		14,896	6,494	11,417	6,816
Outside Subareas (No Change All Alternatives)	2,987	1,302	3,348	1,999	-	5,381	2,346	2,977	1,777	-	1,971	859	1,775	1,060		316	138	398	238		656	286	275	164		1,567	683	2,569	1,533		602	262	1,687	1,007		1,970	859	3,578	2,136		15,450	6,735	16,607	9,914
Total	34,485	13,752	39,459	11,900	-	30,984	12,794	27,482	10,881	-	8,665	6,018	18,894	10,534		28,240	19,413	92,779	90,733		18,957	13,254	6,646	4,692		14,172	6,179	7,967	5,054		4,765	1,929	21,880	14,569		26,384	6,661	27,562	9,637		166,652	80,000	242,669	158,000
Share of Target		17.2%		7.5%			16.0%		6.9%			7.5%		6.7%			24.3%		57.4%			16.6%		3.0%			7.7%		3.2%			2.4%		9.2%			8.3%		6.1%					

	Analysis Zone 1					Analysis Zone 2					Analysis Zone 3					Analysis Zone 4					Analysis Zone 5					Analysis Zone 6					Analysis Zone 7					Analysis Zone 8					Total			
Alternative 2	HU Capacity	HU Target	Jobs Capacity	Jobs Target		HU Capacity	HU Target	Jobs Capacity	Jobs Target		HU Capacity	HU Target	Jobs Capacity	Jobs Target		HU Capacity	HU Target	Jobs Capacity	Jobs Target		HU Capacity	HU Target	Jobs Capacity	Jobs Target		HU Capacity	HU Target	Jobs Capacity	Jobs Target		HU Capacity	HU Target	Jobs Capacity	Jobs Target		HU Capacity	HU Target	Jobs Capacity	Jobs Target		HU Capacity	HU Target	Jobs Capacity	Jobs Target
Urban Centers	-	-	-	-	-	14,654	6,049	19,048	6,538	-	4,290	3,595	12,017	2,566		26,610	18,265	91,768	87,508		11,536	9,061	3,359	3,258		-	-	-	-		-	-	-	-		-	-	-	-		-	-	-	-		57,090	36,970	126,192	99,870
Hub Urban Villages	16,404	7,588	28,714	6,310	-	4,159	927	2,216	603	-	-	-	-	-		-	-	-	-		-	-	-	-		4,004	3,128	1,597	1,543		-	-	-	-		10,128	1,242	15,699	2,961		34,695	12,885	48,226	11,417
Residential Urban Villages	12,708	3,822	5,090	1,957	-	2,188	1,466	936	355	-	638	402	289	273		1,314	1,010	613	273		5,309	3,193	2,751	1,035		5,792	1,143	2,081	870		1,156	259	2,116	437		11,961	3,469	4,729	2,335		41,066	14,764	18,605	7,535
Manufacturing Industrial Centers	-	-	-	-		-	-	-	-		542	628	4,064	6,100		-	-	-	-		-	-	-	-		-	-	-	-		2,086	848	17,070	12,700		-	-	-	-		2,628	1,476	21,134	18,800
Growth Area (Maritime Industrial)	-	-	-	-		-	-	-	-		-	-	-	-		-	-	-	-		148	144	90	-		-	-	-	-		535	392	317	-		-	-	-	-		827	676	488	-
Neighborhood Anchor - Low Risk	2,399	5,394	2,199	2,236	-	4,171	6,541	2,078	2,198	-	953	2,402	741	857		-	-	-	-		942	3,430	186	723		669	1,706	207	441		-	-	-	-		159	546	35	128		9,293	20,019	5,446	6,583
Neighborhood Anchor - High Risk	-	-	-	-		390	453	99	122		-	-	-	-		-	-	-	-		-	-	-	-		1,700	2,308	1,485	1,217		384	506	690	471		636	881	159	235		3,110	4,148	2,433	2,045
Outside Subareas (This Alternative)	601	262	109	64	-	1,105	482	175	157	-	419	183	8	9		-	-	-	-		498	217	32	19		1,052	459	28	22		9	4	-	-		1,652	720	3,280	1,866		5,336	2,327	3,632	2,119
Outside Subareas (No Change All Alternatives)	2,987	1,302	3,348	1,939	-	5,381	2,346	2,977	1,724	-	1,971	859	1,775	1,028		316	138	398	230		656	286	275	159		1,567	683	2,569	1,488		602	262	1,687	977		1,970	859	3,578	2,072		15,450	6,735	16,607	9,617
Total	35,099	18,368	39,460	12,506	-	32,048	18,264	27,529	11,697	-	8,813	8,069	18,894	10,829		28,240	19,413	92,779	88,011		19,089	16,331	6,693	5,194		14,784	9,427	7,967	5,581		4,772	2,271	21,880	14,585		26,650	7,857	27,561	9,597		169,495	100,000	242,763	158,000
Share of Target		18.4%		7.9%			18.3%		7.4%			8.1%		6.9%			19.4%		55.7%			16.3%		3.3%			9.4%		3.5%			2.3%		9.2%			7.9%		6.1%					

	Analysis Zone 1					Analysis Zone 2					Analysis Zone 3					Analysis Zone 4					Analysis Zone 5					Analysis Zone 6					Analysis Zone 7					Analysis Zone 8					Total			
Alternative 3	HU Capacity	HU Target	Jobs Capacity	Jobs Target		HU Capacity	HU Target	Jobs Capacity	Jobs Target		HU Capacity	HU Target	Jobs Capacity	Jobs Target		HU Capacity	HU Target	Jobs Capacity	Jobs Target		HU Capacity	HU Target	Jobs Capacity	Jobs Target		HU Capacity	HU Target	Jobs Capacity	Jobs Target		HU Capacity	HU Target	Jobs Capacity	Jobs Target		HU Capacity	HU Target	Jobs Capacity	Jobs Target		HU Capacity	HU Target	Jobs Capacity	Jobs Target
Urban Centers	-	-	-	-	-	14,654	6,049	19,048	6,538	-	4,290	3,595	12,017	2,566		26,610	18,265	91,768	87,508		11,536	9,061	3,359	3,258		-	-	-	-		-	-	-	-		-	-	-	-		-	-	-	-		57,090	36,970	126,192	99,870
Hub Urban Villages	16,404	7,588	28,714	6,310	-	4,159	927	2,216	603	-	-	-	-	-		-	-	-	-		-	-	-	-		4,004	3,128	1,597	1,543		-	-	-	-		10,128	1,242	15,699	2,961		34,695	12,885	48,226	11,417
Residential Urban Villages	12,708	3,822	5,090	1,957	-	2,188	1,466	936	355	-	638	402	289	273		1,314	1,010	613	273		5,309	3,193	2,751	1,035		5,792	1,143	2,081	870		1,156	259	2,116	437		11,961	3,469	4,729	2,335		41,066	14,764	18,605	7,535
Manufacturing Industrial Centers	-	-	-	-		-	-	-	-		542	628	4,064	6,100		-	-	-	-		-	-	-	-		-	-	-	-		2,086	848	17,070	12,700		-	-	-	-		2,628	1,476	21,134	18,800
Growth Area (Maritime Industrial)	-	-	-	-		-	-	-	-		-	-	-	-		-	-	-	-		148	144	90	-		-	-	-	-		535	392	317	-		144	140	81	-		827	676	488	-
Neighborhood Residential	9,210	4,095	123	754	-	17,892	7,921	154	221	-	1,680	875	24	18		-	-	-	-		1,218	741	37	284		9,654	4,480	15	23		41	21	-	-		8,589	4,290	3,176	4,606		48,284	22,423	3,529	5,906
Outside Subareas (This Alternative)	1,741	760	2,193	1,330	-	3,429	1,497	2,156	1,389	-	812	355	721	439		-	-	-	-		767	334	139	83		1,702	743	1,707	1,056		376	165	690	401		498	217	277	153		9,325	4,071	7,883	4,855
Outside Subareas (No Change All Alternatives)	2,987	1,302	3,348	1,939	-	5,381	2,346	2,977	1,724	-	1,971	859	1,775	1,028		316	138	398	230		656	286	275	159		1,567	683	2,569	1,488		602	262	1,687	977		1,970	859	3,578	2,072		15,450	6,735	16,607	9,617
Total	43,050	17,567	39,468	12,290	-	47,703	20,206	27,487	10,830	-	9,933	6,714	18,890	10,424		28,240	19,413	92,779	88,011		19,634	13,759	6,651	4,823		22,719	10,177	7,969	4,980		4,796	1,947	21,880	14,515		33,290	10,217	27,540	12,127		209,365	100,000	242,664	158,000
Share of Target		17.6%		7.8%			20.2%		6.9%			6.7%		6.6%			19.4%		55.7%			13.8%		3.1%			10.2%		3.2%			1.9%		9.2%			10.2%		7.7%					

	Analysis Zone 1					Analysis Zone 2					Analysis Zone 3					Analysis Zone 4					Analysis Zone 5					Analysis Zone 6					Analysis Zone 7					Analysis Zone 8					Total			
Alternative 4	HU Capacity	HU Target	Jobs Capacity	Jobs Target		HU Capacity	HU Target	Jobs Capacity	Jobs Target		HU Capacity	HU Target	Jobs Capacity	Jobs Target		HU Capacity	HU Target	Jobs Capacity	Jobs Target		HU Capacity	HU Target	Jobs Capacity	Jobs Target		HU Capacity	HU Target	Jobs Capacity	Jobs Target		HU Capacity	HU Target	Jobs Capacity	Jobs Target		HU Capacity	HU Target	Jobs Capacity	Jobs Target		HU Capacity	HU Target	Jobs Capacity	Jobs Target
Urban Centers	-	-	-	-	-	14,654	6,049	19,048	6,538	-	4,290	3,595	12,017	2,566		26,610	18,265	91,768	87,508		11,536	9,061	3,359	3,258		-	-	-	-		-	-	-	-		-	-	-	-		-	-	-	-		57,090	36,970	126,192	99,870
Hub Urban Villages	16,404	7,588	28,714	6,310	-	4,159	927	2,216	603	-	-	-	-	-		-	-	-	-		-	-	-	-		4,004	3,128	1,597	1,543		-	-	-	-		10,128	1,242	15,699	2,961		34,695	12,885	48,226	11,417
Residential Urban Villages	12,708	3,822	5,090	1,957	-	2,188	1,466	936	355	-	638	402	289	273		1,314	1,010	613	273		5,309	3,193	2,751	1,035		5,792	1,143	2,081	870		1,156	259	2,116	437		11,961	3,469	4,729	2,335		41,066	14,764	18,605	7,535
Manufacturing Industrial Centers	-	-	-	-		-	-	-	-		542	628	4,064	6,100		-	-	-	-		-	-	-	-		-	-	-	-		2,086	848	17,070	12,700		-	-	-	-		2,628	1,476	21,134	18,800
Growth Area (Maritime Industrial)	-	-	-	-		-	-	-	-		-	-	-	-		-	-	-	-		148	144	90	-		-	-	-	-		535	392	317	-		144	140	81	-		827	676	488	-
Neighborhood Residential-Corridor	5,081	3,579	104	1,165	-	12,150	8,484	15	129	-	914	694	-	-		-	-	-	-		816	719	37	449		5,718	4,114	1	12		41	33	-	-		4,744	3,584	175	2,155		29,464	21,207	332	3,910
Outside Subareas (This Alternative)	2,090	910	2,212	1,371	-	4,063	1,769	2,295	1,549	-	1,055	460	741	447		-	-	-	-		929	404	139	91		2,277	993	1,720	1,098		376	164	690	401		1,347	587	3,284	1,894		12,137	5,287	11,081	6,851
Outside Subareas (No Change All Alternatives)	2,987	1,302	3,348	1,939	-	5,381	2,346	2,977	1,724	-	1,971	859	1,775	1,028		316	138	398	230		656	286	275	159		1,567	683	2,569	1,488		602	262	1,687	977		1,970	859	3,578	2,072		15,450	6,735	16,607	9,617
Total	39,270	17,201	39,468	12,742	-	42,595	21,041	27,487	10,898	-	9,410	6,638	18,886	10,414		28,240	19,413	92,779	88,011		19,394	13,807	6,651	4,992		19,358	10,061	7,968	5,011		4,796	1,958	21,880	14,515		30,294	9,881	27,546	11,417		193,357	100,000	242,665	158,000
Share of Target		17.2%		8.1%			21.0%		6.9%			6.6%		6.6%			19.4%		55.7%			13.8%		3.2%			10.1%		3.2%			2.0%		9.2%			9.9%		7.2%					

	Analysis Zone 1					Analysis Zone 2					Analysis Zone 3					Analysis Zone 4					Analysis Zone 5					Analysis Zone 6					Analysis Zone 7					Analysis Zone 8					Total			
Alternative 5	HU Capacity	HU Target	Jobs Capacity	Jobs Target		HU Capacity	HU Target	Jobs Capacity	Jobs Target		HU Capacity	HU Target	Jobs Capacity	Jobs Target		HU Capacity	HU Target	Jobs Capacity	Jobs Target		HU Capacity	HU Target	Jobs Capacity	Jobs Target		HU Capacity	HU Target	Jobs Capacity	Jobs Target		HU Capacity	HU Target	Jobs Capacity	Jobs Target		HU Capacity	HU Target	Jobs Capacity	Jobs Target		HU Capacity	HU Target	Jobs Capacity	Jobs Target
Urban Centers	5,601	6,042	4,129	4,097	-	14,654	6,049	19,048	6,403	-	4,367	3,634	12,017	2,514		26,610	18,265	91,768	85,703		11,536	9,061	3,359	3,191		-	-	-	-		-	-	-	-		-	-	-	-		-	-	-	-		62,768	43,051	130,321	101,908
Hub Urban Villages	10,803	2,546	24,585	2,256	-	4,159	927	2,216	591	-	-	-	-	-		-	-	-	-		-	-	-	-		4,071	3,140	1,612	1,526		-	-	-	-		10,128	1,242	15,699	2,900		29,161	7,855	44,112	7,273
Residential Urban Villages	12,998	3,838	5,108	1,928	-	10,440	3,110	1,852	704	-	708	429	289	267		1,314	1,010	613	267		5,317	3,194	2,751	1,014		6,048	2,884	2,081	1,152		1,156	1,659	2,116	671		12,079	6,738	4,827	2,875		50,060	22,862	19,637	8,878
Manufacturing Industrial Centers	-	-	-	-	-	-	-	-	-		542	628	4,064	6,100		-	-	-	-		-	-	-	-		-	-	-	-		2,086	848	17,070	12,700		-	-	-	-		2,628	1,476	21,134	18,800
Growth Area (Maritime Industrial)	-	-	-	-	-	-	-	-	-		-	-	-	-		-	-	-	-		148	144	90	-		-	-	-	-		535	392	317	-		144	140	81	-		827	676	488	-
Neighborhood Anchor - Low Risk	2,399	4,495	2,199	1,893	-	4,811	5,127	1,455	1,799	-	953	2,002	741	707		-	-	-	-		942	2,830	186	510		669	1,406	207	333		-	-	-	-		159	446	35	92		9,933	16,306	4,823	5,334
Neighborhood Anchor - High Risk	-	-	-	-	-	-	-	-	-		-	-	-	-		-	-	-	-		-	-	-	-		1,373	2,083	1,485	1,101		377	461	690	443		452	791	160	194		2,202	3,335	2,335	1,738
Neighborhood Residential	4,033	1,885	6	6	-	5,487	2,569	84	84	-	591	310	4	4		-	-	-	-		395	240	-	-		3,777	1,878	14	14		-	-	-	-		3,716	1,966	2,988	3,005		17,999	8,848	3,096	3,113
Neighborhood Residential-Corridor	4,229	1,390	93	457	-	10,616	3,429	10	49	-	801	305	-	-		-	-	-	-		650	346	36	177		4,887	1,674	1	5		33	14	-	-		4,458	1,698	173	850		25,674	8,856	313	1,538
Outside Subareas (This Alternative)	-	-	-	-	-	-	-	-	-		-	-	-	-		-	-	-	-		-	-	-	-		-	-	-	-		-	-	-	-		-	-	-	-		-	-	-	-
Outside Subareas (No Change All Alternatives)	2,987	1,302	3,348	1,899	-	5,381	2,346	2,977	1,688	-	1,971	859	1,775	1,001		316	138	398	236		656	286	275	156		1,567	683	2,569	1,457		602	262	1,687	956		1,970	859	3,578	2,029		15,450	6,735	16,607	9,418
Total	43,050	21,498	39,468	12,536	-	55,548	23,557	27,642	11,318	-	9,933	8,167	18,890	10,599		28,240	19,413	92,779	86,196		19,644	16,101	6,697	5,048		22,392	13,748	7,969	5,588		4,789	3,636	21,880	14,770		33,106	13,880	27,541	11,945		216,702	120,000	242,866	158,000
Share of Target		17.9%		7.9%			19.6%		7.2%			6.8%		6.7%			16.2%		54.6%			13.4%		3.2%			11.5%		3.5%			3.0%		9.3%			11.6%		7.6%					

Housing

	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5
Area 1 Northwest	17.2%	18.4%	17.6%	17.2%	17.9%
Area 2 Northeast	16.0%	18.3%	20.2%	21.0%	19.6%
Area 3 West	7.5%	8.1%	6.7%	6.6%	6.8%
Area 4 Downtown	24.3%	19.4%	19.4%	19.4%	16.2%
Area 5 East	16.6%	16.3%	13.8%	13.8%	13.4%
Area 6 Southwest	7.7%	9.4%	10.2%	10.1%	11.5%
Area 7 Duwamish Manufacturing Center	2.4%	2.3%	1.9%	2.0%	3.0%
Area 8 Southeast	8.3%	7.9%	10.2%	9.9%	11.6%
Total	100.0%	100.0%	100.0%	100.0%	100.0%

Jobs

	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5
Area 1 Northwest	7.5%	7.9%	7.8%	8.1%	7.9%
Area 2 Northeast	6.9%	7.4%	6.9%	6.9%	7.2%
Area 3 West	6.7%	6.9%	6.6%	6.6%	6.7%
Area 4 Downtown	57.4%	55.7%	55.7%	55.7%	54.6%
Area 5 East	3.0%	3.3%	3.1%	3.2%	3.2%
Area 6 Southwest	3.2%	3.5%	3.2%	3.2%	3.5%
Area 7 Duwamish Manufacturing Center	9.2%	9.2%	9.2%	9.2%	9.3%
Area 8 Southeast	6.1%	6.1%	7.7%	7.2%	7.6%
Total	100.0%	100.0%	100.0%	100.0%	100.0%

Square Footage

Using Job Targets 250 square feet

Commercial Square Feet

	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5
Area 1 Northwest	2,618,000	2,751,320	2,703,800	2,803,240	2,737,820
Area 2 Northeast	2,193,820	2,573,340	2,382,600	2,397,560	2,489,960
Area 3 West	1,803,167	1,868,067	1,778,967	1,776,767	1,817,467
Area 4 Downtown	19,961,240	19,362,420	19,362,420	19,362,420	18,961,120
Area 5 East	1,032,240	1,162,680	1,061,060	1,098,240	1,110,560
Area 6 Southwest	1,111,880	1,227,820	1,095,600	1,102,420	1,229,360
Area 7 Duwamish Manufacturing Center	2,134,397	2,107,917	2,122,517	2,122,517	2,178,358
Area 8 Southeast	2,120,140	2,311,940	2,467,940	2,511,760	2,627,900
Total	33,174,904	33,174,904	33,174,904	33,174,904	33,174,845
	132,700	132,700	132,700	132,700	132,699

Using Job Targets 700 square feet

Industrial Square Feet

	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5
Area 1 Northwest	999,600	1,050,504	1,032,360	1,070,328	1,053,024
Area 2 Northeast	914,004	982,548	909,720	915,432	950,712
Area 3 West	2,224,932	2,349,712	2,215,692	2,214,852	2,330,392
Area 4 Downtown	7,621,572	7,392,924	7,392,924	7,392,924	7,240,464
Area 5 East	394,128	436,296	405,132	419,328	424,032
Area 6 Southwest	424,536	468,804	418,320	420,924	469,392
Area 7 Duwamish Manufacturing Center	4,221,988	4,220,332	4,217,452	4,217,452	4,238,840
Area 8 Southeast	2,120,140	2,311,940	2,467,940	2,511,760	2,627,900
Total	17,710,268	17,710,268	17,710,268	17,710,268	17,710,246
	25,300	25,300	25,300	25,300	25,300

	Split %Com	%Ind
SIML	54%	46%
General	88%	12.0%

SIML and UGC Jobs/Sq Ft
SIML Job Splits in MIC
Citywide excluding SIML 88% comm and 12% ind per Census On the Map 2019

Potential Job Sector Split

Notes:
Assume less SF in Downtown Office
Ensure 10% higher retail/service in neighborhoods
For MIC, match SIML EIS

Jobs per SF in King County UGC for Seattle

	Commercial	Industrial
Low	275	500
High	300	700

https://kingcounty.gov/~/media/depts/executive/performance-strategy-budget/regional-planning/GrowthManagement/GMPC-2021/GMPC-Meeting-062321/KC-UGC-Final-Draft-Report-June-2021.ashx?la=en

Suggest using SIML Assumptions

250	700

For office shows some smaller square feet which may be appropriate given change in Downtown/elsewhere due to COVID effects. For Industrial shows higher range and still similar to SIML for conservative Air Q.

JOBS per SF: CAI, September 1, 2020: Seattle Maritime and Industrial StrategyEmployment Trends and Land Use Alternatives Analysis

Absorption Assumptions: Required Redevelopment Land

Absorption assumptions by subarea expressed as square feet of land per job are used to determine the required land to be redeveloped to accommodate the assumed employment growth. Square feet of land per job is calculated by dividing square feet of building area per job

Exhibit 24. Absorption Assumptions by Subarea, No Action Alternative, 2035

Sources: Puget Sound Regional Council, 2020; Community Attributes Inc., 2020.

Land Use	Industry	Ballard	Interbay/ Uptown	Interbay/ SeattleCenter	SODO/ Stadium	South Park/ Georgetown
Other	Hospitality & Tourism	1,400	1,400	1,200	1,000	700
Ind	Construction and Utilities	850	1,400	1,571	1,000	700
Com & Off	ICT	365	980	577	571	529
Ind	Distribution & E-commerce	850	1,400	1,571	1,000	700
Ind	Food & Beverage Production	850	1,400	1,571	1,000	700
Ind	Aerospace	850	1,400	1,571	1,000	700
Ind	Transportation & Logistics	850	1,400	1,571	1,000	700
Ind	Maritime	850	1,400	1,571	1,000	700
Ind	Other Manufacturing	850	1,400	1,571	1,000	700
Com & Off	All Other Retail	365	980	577	571	529
Com & Off	All Other Services	365	980	577	571	529
Gov & Ed	Government	1,000	2,000	2,000	429	357
Gov & Ed	Education	1,000	2,000	2,000	429	357

SECTOR SPLITS: CAI, September 1, 2020: Seattle Maritime and Industrial StrategyEmployment Trends and Land Use Alternatives Analysis

Total Historic and Projected Employment by Industry, City of Seattle, 2010-2035

Sources: Bureau of Labor Statistics, 2020; Puget Sound Regional Council, 2020; Washington State Employment Security Department, 2020; Community Attributes Inc., 2020.

	2010	2015	2018	2035	2018-2035 CAGR	2018-2035 Growth
All Other Services	209,800	232,600	249,500	280,400	0.7%	30,900
Hospitality & Tourism	52,800	63,400	70,800	95,300	1.8%	24,500
Distribution & E-commerce	20,500	38,700	60,400	104,400	3.3%	44,000
Education	58,900	66,500	59,000	58,400	-0.1%	-600
ICT	23,900	36,000	50,400	129,400	5.7%	79,000
Government	48,700	46,600	49,400	49,000	0.0%	-400
Construction and Utilities	23,200	27,400	34,400	52,900	2.6%	18,500
All Other Retail	21,900	23,400	23,000	24,500	0.4%	1,500
Food & Beverage Productio	13,100	15,900	16,500	22,600	1.9%	6,100
Maritime	16,500	15,100	15,600	15,900	0.1%	300
Other Manufacturing	10,900	11,200	10,600	8,300	-1.4%	-2,300
Transportation & Logistics	7,200	7,700	9,100	11,800	1.5%	2,700
Aerospace	9,500	8,700	7,900	7,900	0.0%	0
Suppressed	100	100	200	200	0.0%	0
Total	517,100	593,000	656,800	861,000	1.6%	204,200

Estimate 2035 Share by Jobs and apply?

Commercial
Commercial
Industrial
Commercial
Commercial
Commercial
Industrial
Commercial
Industrial
Industrial
Industrial
Industrial
Industrial

SIML Emp SF

Base Year Split	Industrial	Non-Industrial
BINMIC	6,783,129	5,375,837
Greater Duwamish	34632076	13,896,776
Total	**41,415,205**	**19,272,613**

Preferred Alternative - Balanced Gross

Industrial Emp	Total Emp	% Industrial
70,853	134,045	52.9%

Preferred Alternative - Balanced Net

Industrial Emp	Total Emp	% Industrial
16,253	35,545	45.7%

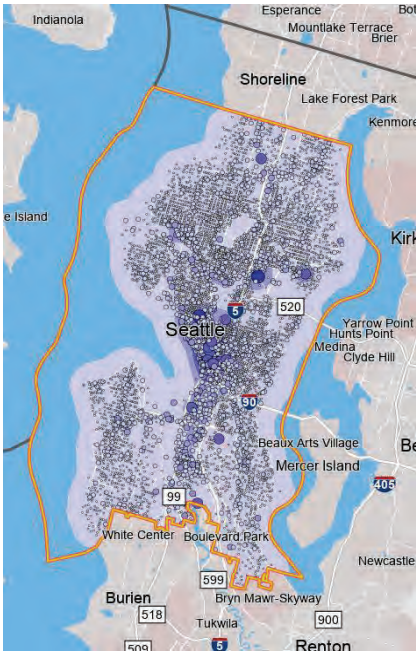
Industrial	Commercial
46%	54%

Questions
Assume all Commercial in neighborhoods?
Assume SIMIL breakdown in MICs? By Jobs or SF?

SECTOR SPLITS: Census on the Map, Total Jobs

Jobs by N/	Citywide 2019		SIML 2019		Citywide Minus SIML 2019
	Count	Share	Count	Share	
Agriculture,	1,261	0.2%	741	1.0%	520
Mining, Qua	135	0.0%	48	0.1%	87
Utilities	3,312	0.6%	168	0.2%	3,144
Constructior	24,590	4.2%	6,653	8.9%	17,937
Manufacturi	27,519	4.7%	16,482	22.2%	11,037
Wholesale T	20,904	3.6%	7,200	9.7%	13,704
Retail Trade	40,787	7.0%	4,593	6.2%	36,194
Transportati	23,520	4.0%	6,334	8.5%	17,186
Information	36,909	6.3%	4,143	5.6%	32,766
Finance and	20,464	3.5%	397	0.5%	20,067
Real Estate	13,993	2.4%	1,373	1.8%	12,620
Professional	76,267	13.1%	4,219	5.7%	72,048
Managemer	18,644	3.2%	7,103	9.5%	11,541
Administratic	24,073	4.1%	2,802	3.8%	21,271
Educational	45,713	7.8%	813	1.1%	44,900
Health Care	89,138	15.3%	1,625	2.2%	87,513
Arts, Enterta	14,268	2.4%	2,219	3.0%	12,049
Accommoda	55,410	9.5%	4,955	6.7%	50,455
Other Servic	26,194	4.5%	2,357	3.2%	23,837
Public Admi	19,695	3.4%	157	0.2%	19,538

Citywide			SIML			Citywide Minus SIML		
Total	Industrial	Ind Share	Total	Industrial	Ind Share	Total	Industrial	Ind Share
582,796	101,241	17.37%	74,382	37,626	50.58%	508,414	63,615	12.51%



MOVES Methodology and Assumptions

The Motor Vehicle Emissions Simulator (MOVES) by the US Environmental Protection Agency is a state-of-the-science emission modeling system that estimates emissions for mobile sources at the national, county, and project level for criteria air pollutants, greenhouse gases, and air toxics.

Estimating vehicle emissions for the Seattle Comprehensive Plan Environmental Impact Study relied on the county level analysis of the model. The following model inputs were taken from the 2017 Washington Comprehensive Emissions Inventory Technical Support Document (WCEI) and data provided by the City. All other MOVES inputs relied on default assumptions for Kings County, Washington.

- VMT Data
- Average Speed Distribution
- Source (vehicle) Type Populations
- Road Type Distribution

Population characteristics were pulled from the WCEI and used to transform provided City VMT data and average speed distributions to fit within MOVES source VMT, population, and speed breakdowns. MOVES assumes fuel economy compliance and average values with the Safer Affordable Fuel Efficient (SAFE) Vehicles Final Rule. Adjustment ratios for energy (fuel) consumption and CO_2 emission factors (based on the SAFE final rule) vary by model year from 2017 through 2025.[1] Vehicle models after 2025 are conservatively assumed to have 2025 emissions and fuel use factors. Vehicle models before 2017, which is the implementation year of the SAFE Final Rule, assume CAFE standards.[2]

[1] *MOVES3 technical guidance - US EPA*. (n.d.). Retrieved March 3, 2023, from https://nepis.epa.gov/Exe/ZyPDF.cgi?Dockey=P1010M5F.pdf
[2] *MOVES3 technical guidance - US EPA*. (n.d.). Retrieved March 3, 2023, from https://nepis.epa.gov/Exe/ZyPDF.cgi?Dockey=P100NNUQ.pdf

Appendix Key

City Vehicle Category	sourceTypeID	sourceTypeName
Car	11	Motorcycle
	21	Passenger Car
	31	Passenger Truck
	32	Light Commercial Truck
Bus	41	Other Buses
	42	Transit Bus
	43	School Bus
Truck	52	Single Unit Short-haul Truck
	53	Single Unit Long-haul Truck
	61	Combination Short-haul Truck
	62	Combination Long-haul Truck

FuelTypeID	FuelTypeName
1	Gasoline
2	Diesel Fuel
3	Compressed Natural Gas (CNG)
5	Ethanol (E-85)

Exisiting - MOVES Output Summary

Energy Consumption of Fuel (MMBtu)				
Fuel Type	Cars	Trucks	Buses	**Total**
Gasoline	345,396.9	1,561.7	125.2	**347,083.8**
Diesel	8,074.3	5,323.0	752.0	**14,149.2**
CNG	-	63.0	52.8	**115.8**
Ethanol (E-85)	620.5	-	-	**620.5**

Pollutant Emissions (tpy)							
Vehicle Type	VOC	NOX	CO	SOX	Total PM10	Total PM2.5	CO2e (Metric Tons)
Cars	276.22	109.84	1,760.37	1.43	1.67	1.45	14,761.02
Trucks	7.35	6.23	38.65	0.08	1.08	0.95	8,344.42
Buses	0.45	0.66	5.15	0.03	1.06	0.93	7,964.38
Total	**284.02**	**116.74**	**1,804.17**	**1.54**	**3.81**	**3.32**	**31,069.81**

Particulate Matter Emissions (tpy)				
Vehicle Type	Exhaust PM10	Exhaust PM2.5	BW & TW PM10	BW & TW PM2.5
Cars	1.63	1.44	0.04	<0.01
Trucks	1.07	0.94	0.01	<0.01
Buses	1.05	0.93	0.01	<0.01
Total	**3.74**	**3.31**	**0.06**	**0.01**

Alternative 1 - MOVES Output Summary

Energy Consumption of Fuel (MMBtu)				
Fuel Type	Cars	Trucks	Buses	**Total**
Gasoline	336,190.6	1,774.4	127.0	**338,092.0**
Diesel	13,508.1	5,938.1	783.4	**20,229.6**
CNG	-	110.9	49.7	**160.6**
Ethanol (E-85)	630.5	-	-	**630.5**

Pollutant Emissions (tpy)							
Vehicle Type	VOC	NOX	CO	SOX	Total PM10	Total PM2.5	CO2e (Metric Tons)
Cars	151.63	48.74	641.98	0.16	4.67	4.09	28,553.89
Trucks	5.25	6.68	15.25	<0.01	0.11	0.08	763.00
Buses	0.44	0.96	2.32	<0.01	0.01	0.01	91.32
Total	**157.31**	**56.37**	**659.55**	**0.16**	**4.78**	**4.19**	**29,408.21**

Particulate Matter Emissions (tpy)				
Vehicle Type	Exhaust PM10	Exhaust PM2.5	BW & TW PM10	BW & TW PM2.5
Cars	4.62	4.09	0.05	<0.01
Trucks	0.09	0.08	0.01	<0.01
Buses	0.01	0.01	<0.01	<0.01
Total	**4.72**	**4.18**	**0.06**	**0.01**

Alternative 2 - MOVES Output Summary

Energy Consumption of Fuel (MMBtu)				
Fuel Type	Cars	Trucks	Buses	**Total**
Gasoline	345,844.3	1,790.8	127.0	**347,762.1**
Diesel	13,895.2	5,993.4	783.5	**20,672.2**
CNG	-	112.0	49.7	**161.7**
Ethanol (E-85)	648.6	-	-	**648.6**

Pollutant Emissions (tpy)							
Vehicle Type	VOC	NOX	CO	SOX	Total PM10	Total PM2.5	CO2e (Metric Tons)
Cars	156.00	50.14	660.51	0.16	4.80	4.21	29,374.10
Trucks	5.29	6.74	15.38	<0.01	0.11	0.09	770.02
Buses	0.44	0.96	2.32	<0.01	0.01	0.01	91.33
Total	**161.73**	**57.84**	**678.21**	**0.16**	**4.92**	**4.31**	**30,235.44**

Particulate Matter Emissions (tpy)				
Vehicle Type	Exhaust PM10	Exhaust PM2.5	BW & TW PM10	BW & TW PM2.5
Cars	4.75	4.21	0.05	<0.01
Trucks	0.09	0.08	0.01	<0.01
Buses	0.01	0.01	<0.01	<0.01
Total	**4.86**	**4.30**	**0.06**	**0.01**

Alternative 3 - MOVES Output Summary

Energy Consumption of Fuel (MMBtu)				
Fuel Type	Cars	Trucks	Buses	**Total**
Gasoline	345,808.9	1,796.4	127.0	**347,732.2**
Diesel	13,893.4	6,015.5	783.5	**20,692.3**
CNG	-	112.5	49.7	**162.2**
Ethanol (E-85)	648.5	-	-	**648.5**

Pollutant Emissions (tpy)							
Vehicle Type	VOC	NOX	CO	SOX	Total PM10	Total PM2.5	CO2e (Metric Tons)
Cars	156.00	50.14	660.50	0.16	4.75	4.21	29,371.26
Trucks	5.29	6.74	15.39	<0.01	0.09	0.08	772.21
Buses	0.44	0.96	2.32	<0.01	0.01	0.01	91.32
Total	**161.73**	**57.84**	**678.21**	**0.16**	**4.86**	**4.30**	**30,234.78**

Particulate Matter Emissions (tpy)				
Vehicle Type	Exhaust PM10	Exhaust PM2.5	BW & TW PM10	BW & TW PM2.5
Cars	4.75	4.21	0.05	0.01
Trucks	0.09	0.08	0.01	<0.01
Buses	0.01	0.01	<0.01	<0.01
Total	**4.86**	**4.30**	**0.06**	**0.01**

Alternative 5 - MOVES Output Summary

Energy Consumption of Fuel (MMBtu)				
Fuel Type	Cars	Trucks	Buses	**Total**
Gasoline	357,628.0	1,812.4	127.0	**359,567.5**
Diesel	14,367.8	6,067.3	783.6	**21,218.7**
CNG	-	113.4	49.7	**163.1**
Ethanol (E-85)	670.7	-	-	**670.7**

Pollutant Emissions (tpy)							
Vehicle Type	VOC	NOX	CO	SOX	Total PM10	Total PM2.5	CO2e (Metric Tons)
Cars	161.35	51.86	683.13	0.17	4.96	4.36	30,375.28
Trucks	5.35	6.81	15.55	<0.01	0.11	0.09	779.30
Buses	0.44	0.96	2.32	<0.01	0.01	0.01	91.33
Total	**167.14**	**59.63**	**701.00**	**0.17**	**5.09**	**4.45**	**31,245.91**

Particulate Matter Emissions (tpy)				
Vehicle Type	Exhaust PM10	Exhaust PM2.5	BW & TW PM10	BW & TW PM2.5
Cars	4.91	4.35	0.05	<0.01
Trucks	0.10	0.09	0.01	<0.01
Buses	0.01	0.01	<0.01	<0.01
Total	**5.02**	**4.45**	**0.06**	**0.01**

Existing - MOVES3 Raw Data (in grams)

Fuel	Source	VOC	CO	NOx	Exhaust PM10	Exhaust PM2.5	Brake PM10	Tire PM10	Brake PM2.5	Tire PM2.5	SO2	Total Energy (in Joules)	CO2 Equiv
1	11	89651	433906	26580	857	758	607	195	76	29	99	2.06518E+11	14980114
1	21	86887960	377444576	22882190	2351674	2080336	19339	6928	2417	1039	83620	1.75152E+14	13452663808
2	21	975254	3876465	259825	30418	27985	447	160	56	24	777	3.16407E+12	249328832
5	21	68815	261573	15814	1601	1416	13	5	2	1	66	1.21108E+11	9329335
1	31	39408576	157328960	10889318	1365948	1208343	8552	2762	1069	414	43752	9.16441E+13	7105861120
2	31	1087115	3196286	3686041	27862	25633	673	237	84	36	1349	5.49143E+12	425450432
5	31	130194	458056	31672	3911	3460	25	8	3	1	148	2.7092E+11	21013776
1	32	42078020	181813312	12307787	1431811	1266607	8700	2826	1087	424	46713	9.7845E+13	7605724672
2	32	1091511	2759973	5139476	19417	17864	693	253	87	38	1475	6.00281E+12	464232256
5	32	147482	502735	34674	4275	3782	26	8	3	1	160	2.92224E+11	22671220
1	41	117659	758328	79068	5337	4721	29	4	4	1	30	62693715968	5636622
2	41	79194	289039	333168	667	613	450	52	56	8	77	3.12153E+11	24705524
3	41	503	96952	136	25	22	26	2	3	0	7	23555983360	6147819
1	42	143095	847921	88843	6010	5317	24	4	3	1	33	69638766592	6268355
2	42	88472	322076	370191	743	684	235	29	29	4	84	3.4108E+11	27036770
3	42	524	107853	116	28	25	18	2	2	0	8	25995003904	6826649
1	43	3214	15244	1441	120	107	1	0	0	0	1	1641576064	145973
2	43	48019	109391	180210	234	216	255	33	32	5	43	1.73361E+11	13797880
3	43	74	9218	26	5	4	5	1	1	0	1	2876934144	755243
1	52	2073727	10753850	1409047	79580	70398	641	181	80	27	665	1.393E+12	148764992
2	52	2173634	1734560	3865419	5774	5313	3917	862	490	129	993	4.04099E+12	349237952
3	52	2634	316183	655	71	63	95	13	12	2	22	71958577152	39192624
1	53	1083722	2588266	248346	15353	13582	669	181	84	27	240	5.02264E+11	42748404
2	53	333525	589783	1129765	1876	1726	4015	862	502	129	365	1.48533E+12	116858080
3	53	863	88204	648	27	24	96	13	12	2	10	30457241600	6500381
2	61	129721	383837	377694	900	828	855	199	107	30	103	4.17304E+11	33482108
3	61	479	57620	204	17	15	26	4	3	1	5	16308088832	5117634
2	62	34668	449106	396003	892	821	987	232	123	35	99	4.0302E+11	30305280

Alternative 1 - MOVES3 Raw Data (in grams)

Fuel	Source	VOC	CO	NOx	Exhaust PM10	Exhaust PM2.5	Brake PM10	Tire PM10	Brake PM2.5	Tire PM2.5	SO2	Total Energy (in Joules)	CO2 Equiv
1	11	89277	430798	26408	850	752	600	193	75	29	98	2.04967E+11	14867524
1	21	84448336	366858272	22239672	2285651	2021931	19105	6869	2388	1030	81293	1.70278E+14	13078079488
2	21	947869	3767896	252530	29564	27199	442	159	55	24	756	3.07621E+12	242400160
5	21	66883	254237	15370	1556	1376	13	5	2	1	64	1.17737E+11	9069535
1	31	38302108	152916592	10583562	1327596	1174417	8448	2738	1056	411	42535	8.90944E+13	6908027904
2	31	1056592	3106818	3582576	27080	24914	665	235	83	35	1312	5.3392E+12	413648768
5	31	126539	445209	30783	3802	3363	25	8	3	1	144	2.63382E+11	20428640
1	32	40896612	176713168	11962203	1391612	1231047	8595	2802	1074	420	45413	9.51227E+13	7393971200
2	32	1060864	2682723	4995211	18872	17362	685	251	86	38	1434	5.83638E+12	451353600
5	32	143341	488634	33700	4155	3676	26	8	3	1	156	2.84088E+11	22039582
1	41	117659	758327	79068	5337	4721	29	4	4	1	30	62691049472	5636430
2	41	79194	289035	333159	667	613	449	52	56	8	77	3.12139E+11	24704548
3	41	502	96947	136	25	22	26	2	3	0	7	23554007040	6147578
1	42	143095	847923	88843	6010	5317	23	4	3	1	33	69636947968	6268224
2	42	88472	322072	370184	743	683	234	29	29	4	84	3.41069E+11	27035952
3	42	524	107850	116	28	25	18	2	2	0	8	25993469952	6826469
1	43	3214	15244	1441	120	107	1	0	0	0	1	1641457024	145964
2	43	48019	109389	180205	234	216	254	33	32	5	43	1.7335E+11	13797019
3	43	74	9217	26	5	4	5	1	1	0	1	2876554240	755200
1	52	2055602	10658698	1396735	78883	69782	627	176	78	26	658	1.3775E+12	147225936
2	52	2154646	1718550	3830742	5720	5262	3833	837	479	126	981	3.99493E+12	345394368
3	52	2600	313035	638	70	62	93	13	12	2	22	71042408448	38827148
1	53	1074233	2564454	246161	15217	13461	654	176	82	26	236	4.94611E+11	42139928
2	53	330589	583780	1118975	1856	1708	3929	837	491	126	359	1.46191E+12	115067312
3	53	846	87055	631	27	24	94	13	12	2	9	29905813504	6420442
2	61	128578	380273	374034	888	817	837	193	105	29	101	4.1117E+11	33006202
3	61	471	56973	199	17	15	26	4	3	1	5	16057075712	5064491
2	62	34355	444952	392188	881	810	967	225	121	34	98	3.97034E+11	29858814

Alternative 2 - MOVES3 Raw Data (in grams)

Fuel	Source	VOC	CO	NOx	Exhaust PM10	Exhaust PM2.5	Brake PM10	Tire PM10	Brake PM2.5	Tire PM2.5	SO2	Total Energy (in	CO2 Equiv
1	11	90005	436676	26727	863	763	614	196	77	29	99	2.07891E+11	15079790
1	21	86888120	377450112	22882212	2351681	2080342	19564	6983	2445	1048	83628	1.75169E+14	13453901824
2	21	975255	3876588	259826	30418	27985	452	161	57	24	777	3.16446E+12	249357136
5	21	68816	261577	15814	1601	1416	14	5	2	1	66	1.21119E+11	9330182
1	31	39408664	157331264	10889330	1365950	1208346	8651	2784	1081	418	43757	9.16532E+13	7106513408
2	31	1087118	3196405	3686064	27862	25633	680	239	85	36	1349	5.49218E+12	425506016
5	31	130194	458062	31672	3912	3460	26	8	3	1	148	2.70947E+11	21015668
1	32	42078124	181815552	12307801	1431814	1266611	8800	2849	1100	427	46717	9.78547E+13	7606427136
2	32	1091514	2760079	5139507	19417	17864	701	255	88	38	1475	6.00362E+12	464292160
5	32	147482	502742	34674	4275	3782	26	8	3	1	160	2.92251E+11	22673136
1	41	117659	758321	79068	5337	4721	29	4	4	1	30	62695645184	5636762
2	41	79194	289045	333179	667	613	451	52	56	8	77	3.12169E+11	24706708
3	41	503	96955	137	25	22	26	2	3	0	7	23558006784	6148078
1	42	143095	847917	88843	6010	5317	24	4	3	1	33	69640691712	6268494
2	42	88472	322080	370199	743	684	235	29	29	4	84	3.41096E+11	27037942
3	42	524	107855	116	28	25	18	2	2	0	8	25996738560	6826853
1	43	3214	15244	1441	120	107	1	0	0	0	1	1641715456	145983
2	43	48019	109392	180215	234	216	255	33	32	5	43	1.73378E+11	13799094
3	43	74	9218	26	5	4	5	1	1	0	1	2877393664	755296
1	52	2073698	10752545	1409030	79578	70396	637	178	80	27	664	1.39001E+12	148549104
2	52	2173614	1733827	3864699	5771	5309	3891	847	486	127	990	4.03141E+12	348531264
3	52	2625	315839	646	71	63	94	13	12	2	22	71711801344	39172764
1	53	1083693	2587069	248330	15351	13580	664	178	83	27	238	4.99341E+11	42537976
2	53	333504	589069	1129064	1873	1723	3988	847	498	127	363	1.47609E+12	116176776
3	53	856	87869	638	27	24	95	13	12	2	9	30213101568	6480817
2	61	129711	383664	377408	897	825	850	196	106	29	102	4.15084E+11	33318466
3	61	476	57491	201	17	15	26	4	3	1	5	16212164608	5110281
2	62	34659	448920	395728	889	818	981	228	123	34	98	4.00838E+11	30144454

Alternative 3 - MOVES3 Raw Data (in grams)

Fuel	Source	VOC	CO	NOx	Exhaust PM10	Exhaust PM2.5	Brake PM10	Tire PM10	Brake PM2.5	Tire PM2.5	SO2	Total Energy (in Joules)	CO2 Equiv
1	11	89651	433906	26580	857	758	607	195	76	29	99	2.06518E+11	14980114
1	21	86887960	377444576	22882190	2351674	2080336	19339	6928	2417	1039	83620	1.75152E+14	13452663808
2	21	975254	3876465	259825	30418	27985	447	160	56	24	777	3.16407E+12	249328832
5	21	68815	261573	15814	1601	1416	13	5	2	1	66	1.21108E+11	9329335
1	31	39408576	157328960	10889318	1365948	1208343	8552	2762	1069	414	43752	9.16441E+13	7105861120
2	31	1087115	3196286	3686041	27862	25633	673	237	84	36	1349	5.49143E+12	425450432
5	31	130194	458056	31672	3911	3460	25	8	3	1	148	2.7092E+11	21013776
1	32	42078020	181813312	12307787	1431811	1266607	8700	2826	1087	424	46713	9.7845E+13	7605724672
2	32	1091511	2759973	5139476	19417	17864	693	253	87	38	1475	6.00281E+12	464232256
5	32	147482	502735	34674	4275	3782	26	8	3	1	160	2.92224E+11	22671220
1	41	117659	758328	79068	5337	4721	29	4	4	1	30	62693715968	5636622
2	41	79194	289039	333168	667	613	450	52	56	8	77	3.12153E+11	24705524
3	41	503	96952	136	25	22	26	2	3	0	7	23555983360	6147819
1	42	143095	847921	88843	6010	5317	24	4	3	1	33	69638766592	6268355
2	42	88472	322076	370191	743	684	235	29	29	4	84	3.4108E+11	27036770
3	42	524	107853	116	28	25	18	2	2	0	8	25995003904	6826649
1	43	3214	15244	1441	120	107	1	0	0	0	1	1641576064	145973
2	43	48019	109391	180210	234	216	255	33	32	5	43	1.73361E+11	13797880
3	43	74	9218	26	5	4	5	1	1	0	1	2876934144	755243
1	52	2073727	10753850	1409047	79580	70398	641	181	80	27	665	1.393E+12	148764992
2	52	2173634	1734560	3865419	5774	5313	3917	862	490	129	993	4.04099E+12	349237952
3	52	2634	316183	655	71	63	95	13	12	2	22	71958577152	39192624
1	53	1083722	2588266	248346	15353	13582	669	181	84	27	240	5.02264E+11	42748404
2	53	333525	589783	1129765	1876	1726	4015	862	502	129	365	1.48533E+12	116858080
3	53	863	88204	648	27	24	96	13	12	2	10	30457241600	6500381
2	61	129721	383837	377694	900	828	855	199	107	30	103	4.17304E+11	33482108
3	61	479	57620	204	17	15	26	4	3	1	5	16308088832	5117634
2	62	34668	449106	396003	892	821	987	232	123	35	99	4.0302E+11	30305280

Alternative 5 - MOVES3 Raw Data (in grams)

Fuel	Source	VOC	CO	NOx	Exhaust PM10	Exhaust PM2.5	Brake PM10	Tire PM10	Brake PM2.5	Tire PM2.5	SO2	Total Energy (in Joules)	CO2 Equiv
1	11	90877	443808	27118	878	777	632	200	79	30	101	2.11425E+11	15336329
1	21	89866488	390379904	23666588	2432285	2151646	20105	7123	2513	1068	86479	1.8114E+14	13912647680
2	21	1008686	4009267	268732	31461	28944	465	165	58	25	804	3.27217E+12	257848944
5	21	71174	270538	16356	1656	1465	14	5	2	1	69	1.25248E+11	9648342
1	31	40759504	162720464	11262601	1412771	1249764	8892	2839	1111	426	45248	9.47766E+13	7348794880
2	31	1124382	3305766	3812398	28817	26511	698	244	87	37	1395	5.67892E+12	439979168
5	31	134657	473753	32758	4046	3579	26	8	3	1	153	2.80181E+11	21732226
1	32	43520460	188044320	12729695	1480892	1310025	9043	2905	1130	436	48309	1.0119E+14	7865763840
2	32	1128929	2854509	5315656	20082	18476	720	260	90	39	1525	6.20776E+12	480085376
5	32	152538	519964	35862	4422	3912	27	9	3	1	166	3.02215E+11	23446494
1	41	117659	758319	79068	5337	4721	29	4	4	1	30	62699704320	5637055
2	41	79195	289053	333194	667	613	453	52	57	8	77	3.12194E+11	24708568
3	41	503	96961	137	25	22	26	2	3	0	7	23561328640	6148482
1	42	143096	847912	88843	6010	5317	24	4	3	1	33	69644083200	6268740
2	42	88472	322087	370211	743	684	236	29	30	4	84	3.4112E+11	27039696
3	42	524	107859	116	28	25	18	2	2	0	8	25999525888	6827170
1	43	3214	15244	1441	120	107	1	0	0	0	1	1641938944	145999
2	43	48019	109395	180222	234	216	256	33	32	5	43	1.73403E+11	13800921
3	43	74	9219	26	5	4	5	1	1	0	1	2878100224	755376
1	52	2096735	10872160	1424680	80462	71178	651	181	81	27	671	1.4064E+12	150267840
2	52	2197758	1753408	3908087	5837	5370	3977	862	497	129	1002	4.07931E+12	352633152
3	52	2659	319467	658	72	63	96	13	12	2	23	72606498816	39616364
1	53	1095739	2616013	251092	15523	13732	679	181	85	27	241	5.05831E+11	43078472
2	53	337218	595936	1142071	1896	1744	4076	862	510	129	367	1.49557E+12	117695192
3	53	869	88963	650	28	24	98	13	12	2	10	30646528000	6561326
2	61	131154	388015	381768	908	836	869	199	109	30	103	4.20412E+11	33741384
3	61	483	58171	205	18	16	27	4	3	1	5	16425464832	5169889
2	62	35047	454009	400299	900	828	1004	232	125	35	100	4.06027E+11	30533616

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

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1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
User Defined Commercial	33,174.90	User Defined Unit	0.00	33,174,904.00	0
User Defined Industrial	17,710.27	User Defined Unit	0.00	17,710,268.00	0
Apartments Low Rise	2,593.00	Dwelling Unit	162.06	2,593,000.00	5316
Apartments Mid Rise	75,370.00	Dwelling Unit	1,983.42	75,370,000.00	154509
Condo/Townhouse	648.00	Dwelling Unit	40.50	648,000.00	1328
Single Family Housing	1,389.00	Dwelling Unit	450.97	2,500,200.00	2847

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.2	**Precipitation Freq (Days)**	85
Climate Zone	14			**Operational Year**	2045
Utility Company	Seattle City Light				
CO2 Intensity (lb/MWhr)	31.35	**CH4 Intensity (lb/MWhr)**	0.029	**N2O Intensity (lb/MWhr)**	0.006

1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Land Use - SF, 2.05 persons per DU

Construction Phase - Ops only

Vehicle Trips - Energy and Solid Waste Only

Woodstoves - Energy and Solid Waste Only

Consumer Products - Energy and Solid Waste Only

Area Coating - Energy and Solid Waste Only

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Landscape Equipment - Energy and Solid Waste Only

Energy Use - Electricity: SCL Carbon Neutral; NG: SCL, EIA

Water And Wastewater - Energy and Solid Waste Only

Solid Waste - Seattle Public Utilities, City of Seattle 2022 Solid Waste Plan Update: Moving Upstream to Zero Waste (2022-2027), December 2022

Table Name	Column Name	Default Value	New Value
tblConstructionPhase	NumDays	10,000.00	0.00
tblConstructionPhase	PhaseEndDate	11/15/2061	7/18/2023
tblEnergyUse	LightingElect	810.36	0.00
tblEnergyUse	LightingElect	741.44	0.00
tblEnergyUse	LightingElect	1,001.10	0.00
tblEnergyUse	LightingElect	1,608.84	0.00
tblEnergyUse	NT24E	3,172.76	0.00
tblEnergyUse	NT24E	3,054.10	0.00
tblEnergyUse	NT24E	3,795.01	0.00
tblEnergyUse	NT24E	6,155.97	0.00
tblEnergyUse	NT24NG	1,599.00	2,301.00
tblEnergyUse	NT24NG	1,599.00	2,028.00
tblEnergyUse	NT24NG	1,599.00	3,029.00
tblEnergyUse	NT24NG	1,599.00	4,576.00
tblEnergyUse	NT24NG	0.00	16.60
tblEnergyUse	NT24NG	0.00	10.40
tblEnergyUse	T24E	165.27	0.00
tblEnergyUse	T24E	176.92	0.00
tblEnergyUse	T24E	204.10	0.00
tblEnergyUse	T24E	191.61	0.00
tblEnergyUse	T24NG	8,768.16	0.00
tblEnergyUse	T24NG	2,182.40	0.00
tblEnergyUse	T24NG	3,351.17	0.00

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

tblEnergyUse	T24NG	9,528.86	0.00
tblFireplaces	NumberGas	1,087.35	0.00
tblFireplaces	NumberGas	53,235.60	0.00
tblFireplaces	NumberGas	293.15	0.00
tblFireplaces	NumberGas	383.90	0.00
tblFireplaces	NumberWood	691.95	0.00
tblFireplaces	NumberWood	33,877.20	0.00
tblFireplaces	NumberWood	186.55	0.00
tblFireplaces	NumberWood	244.30	0.00
tblLandUse	LandUseSquareFeet	0.00	33,174,904.00
tblLandUse	LandUseSquareFeet	0.00	17,710,268.00
tblLandUse	Population	7,416.00	5,316.00
tblLandUse	Population	215,558.00	154,509.00
tblLandUse	Population	1,853.00	1,328.00
tblLandUse	Population	3,973.00	2,847.00
tblSolidWaste	SolidWasteGenerationRate	909.42	934.00
tblSolidWaste	SolidWasteGenerationRate	44,524.32	27,143.00
tblSolidWaste	SolidWasteGenerationRate	245.18	233.00
tblSolidWaste	SolidWasteGenerationRate	357.75	2,115.00
tblSolidWaste	SolidWasteGenerationRate	0.00	76,044.00
tblSolidWaste	SolidWasteGenerationRate	0.00	14,498.00
tblVehicleTrips	ST_TR	8.14	0.00
tblVehicleTrips	ST_TR	4.91	0.00
tblVehicleTrips	ST_TR	8.14	0.00
tblVehicleTrips	ST_TR	9.54	0.00
tblVehicleTrips	SU_TR	6.28	0.00
tblVehicleTrips	SU_TR	4.09	0.00
tblVehicleTrips	SU_TR	6.28	0.00
tblVehicleTrips	SU_TR	8.55	0.00

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

tblVehicleTrips	WD_TR	7.32	0.00
tblVehicleTrips	WD_TR	5.44	0.00
tblVehicleTrips	WD_TR	7.32	0.00
tblVehicleTrips	WD_TR	9.44	0.00
tblWater	IndoorWaterUseRate	128,809,508.65	0.00
tblWater	IndoorWaterUseRate	6,306,388,447.95	0.00
tblWater	IndoorWaterUseRate	34,727,095.66	0.00
tblWater	IndoorWaterUseRate	45,477,509.88	0.00
tblWater	OutdoorWaterUseRate	81,205,994.59	0.00
tblWater	OutdoorWaterUseRate	3,975,766,630.23	0.00
tblWater	OutdoorWaterUseRate	21,893,169.00	0.00
tblWater	OutdoorWaterUseRate	28,670,604.06	0.00
tblWoodstoves	NumberCatalytic	98.85	0.00
tblWoodstoves	NumberCatalytic	4,839.60	0.00
tblWoodstoves	NumberCatalytic	26.65	0.00
tblWoodstoves	NumberCatalytic	34.90	0.00
tblWoodstoves	NumberNoncatalytic	98.85	0.00
tblWoodstoves	NumberNoncatalytic	4,839.60	0.00
tblWoodstoves	NumberNoncatalytic	26.65	0.00
tblWoodstoves	NumberNoncatalytic	34.90	0.00

2.0 Emissions Summary

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

2.1 Overall Construction

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2023	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Maximum	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2023	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Maximum	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOX (tons/quarter)	Maximum Mitigated ROG + NOX (tons/quarter)

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

		Highest		

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	749.5106	6.8305	591.8643	0.0314		3.2957	3.2957		3.2957	3.2957	0.0000	971.2128	971.2128	0.9259	0.0000	994.3606
Energy	4.8639	43.7254	33.5374	0.2653		3.3605	3.3605		3.3605	3.3605	0.0000	48,135.5373	48,135.5373	0.9226	0.8825	48,421.5827
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Waste						0.0000	0.0000		0.0000	0.0000	24,555.2078	0.0000	24,555.2078	1,451.1712	0.0000	60,834.4880
Water						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**754.3745**	**50.5559**	**625.4016**	**0.2967**	**0.0000**	**6.6562**	**6.6562**	**0.0000**	**6.6562**	**6.6562**	**24,555.2078**	**49,106.7501**	**73,661.9579**	**1,453.0197**	**0.8825**	**110,250.4313**

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

2.2 Overall Operational

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	749.5106	6.8305	591.8643	0.0314		3.2957	3.2957		3.2957	3.2957	0.0000	971.2128	971.2128	0.9259	0.0000	994.3606
Energy	4.8639	43.7254	33.5374	0.2653		3.3605	3.3605		3.3605	3.3605	0.0000	48,135.5373	48,135.5373	0.9226	0.8825	48,421.5827
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Waste						0.0000	0.0000		0.0000	0.0000	24,555.2078	0.0000	24,555.2078	1,451.1712	0.0000	60,834.4880
Water						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**754.3745**	**50.5559**	**625.4016**	**0.2967**	**0.0000**	**6.6562**	**6.6562**	**0.0000**	**6.6562**	**6.6562**	**24,555.2078**	**49,106.7501**	**73,661.9579**	**1,453.0197**	**0.8825**	**110,250.4313**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	7/19/2023	7/18/2023	5	0	

Acres of Grading (Site Preparation Phase): 0

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Acres of Grading (Grading Phase): 0

Acres of Paving: 0

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area: 0 (Architectural Coating – sqft)

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Demolition	Excavators	3	8.00	158	0.38
Demolition	Rubber Tired Dozers	2	8.00	247	0.40

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	6	15.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.2 Demolition - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.2 Demolition - 2023

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

4.0 Operational Detail - Mobile

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Apartments Low Rise	0.00	0.00	0.00		
Apartments Mid Rise	0.00	0.00	0.00		
Condo/Townhouse	0.00	0.00	0.00		
Single Family Housing	0.00	0.00	0.00		
User Defined Commercial	0.00	0.00	0.00		
User Defined Industrial	0.00	0.00	0.00		
Total	0.00	0.00	0.00		

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Apartments Low Rise	10.80	7.30	7.50	42.30	19.60	38.10	86	11	3
Apartments Mid Rise	10.80	7.30	7.50	42.30	19.60	38.10	86	11	3
Condo/Townhouse	10.80	7.30	7.50	42.30	19.60	38.10	86	11	3

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Single Family Housing	10.80	7.30	7.50	42.30	19.60	38.10	86	11	3
User Defined Commercial	9.50	7.30	7.30	0.00	0.00	0.00	0	0	0
User Defined Industrial	9.50	7.30	7.30	0.00	0.00	0.00	0	0	0

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Apartments Low Rise	0.534542	0.059637	0.191637	0.128334	0.022737	0.006209	0.003994	0.022357	0.000379	0.000132	0.026770	0.000794	0.002479
Apartments Mid Rise	0.534542	0.059637	0.191637	0.128334	0.022737	0.006209	0.003994	0.022357	0.000379	0.000132	0.026770	0.000794	0.002479
Condo/Townhouse	0.534542	0.059637	0.191637	0.128334	0.022737	0.006209	0.003994	0.022357	0.000379	0.000132	0.026770	0.000794	0.002479
Single Family Housing	0.534542	0.059637	0.191637	0.128334	0.022737	0.006209	0.003994	0.022357	0.000379	0.000132	0.026770	0.000794	0.002479
User Defined Commercial	0.534542	0.059637	0.191637	0.128334	0.022737	0.006209	0.003994	0.022357	0.000379	0.000132	0.026770	0.000794	0.002479
User Defined Industrial	0.534542	0.059637	0.191637	0.128334	0.022737	0.006209	0.003994	0.022357	0.000379	0.000132	0.026770	0.000794	0.002479

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Electricity Mitigated						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
NaturalGas Mitigated	4.8639	43.7254	33.5374	0.2653		3.3605	3.3605		3.3605	3.3605	0.0000	48,135.5373	48,135.5373	0.9226	0.8825	48,421.5827
NaturalGas Unmitigated	4.8639	43.7254	33.5374	0.2653		3.3605	3.3605		3.3605	3.3605	0.0000	48,135.5373	48,135.5373	0.9226	0.8825	48,421.5827

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Apartments Low Rise	5.96649e+006	0.0322	0.2749	0.1170	1.7500e-003		0.0222	0.0222		0.0222	0.0222	0.0000	318.3948	318.3948	6.1000e-003	5.8400e-003	320.2869
Apartments Mid Rise	1.5285e+008	0.8242	7.0431	2.9971	0.0450		0.5694	0.5694		0.5694	0.5694	0.0000	8,156.6773	8,156.6773	0.1563	0.1495	8,205.1484
Condo/Townhouse	1.96279e+006	0.0106	0.0904	0.0385	5.8000e-004		7.3100e-003	7.3100e-003		7.3100e-003	7.3100e-003	0.0000	104.7421	104.7421	2.0100e-003	1.9200e-003	105.3645
Single Family Housing	6.35606e+006	0.0343	0.2929	0.1246	1.8700e-003		0.0237	0.0237		0.0237	0.0237	0.0000	339.1838	339.1838	6.5000e-003	6.2200e-003	341.1994
User Defined Commercial	5.50703e+008	2.9695	26.9953	22.6760	0.1620		2.0516	2.0516		2.0516	2.0516	0.0000	29,387.6310	29,387.6310	0.5633	0.5388	29,562.2670
User Defined Industrial	1.84187e+008	0.9932	9.0288	7.5842	0.0542		0.6862	0.6862		0.6862	0.6862	0.0000	9,828.9084	9,828.9084	0.1884	0.1802	9,887.3167
Total		**4.8639**	**43.7254**	**33.5374**	**0.2653**		**3.3605**	**3.3605**		**3.3605**	**3.3605**	**0.0000**	**48,135.5373**	**48,135.5373**	**0.9226**	**0.8825**	**48,421.5827**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

5.2 Energy by Land Use - NaturalGas

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Apartments Low Rise	5.96649e+006	0.0322	0.2749	0.1170	1.7500e-003		0.0222	0.0222		0.0222	0.0222	0.0000	318.3948	318.3948	6.1000e-003	5.8400e-003	320.2869
Apartments Mid Rise	1.5285e+008	0.8242	7.0431	2.9971	0.0450		0.5694	0.5694		0.5694	0.5694	0.0000	8,156.6773	8,156.6773	0.1563	0.1495	8,205.1484
Condo/Townhouse	1.96279e+006	0.0106	0.0904	0.0385	5.8000e-004		7.3100e-003	7.3100e-003		7.3100e-003	7.3100e-003	0.0000	104.7421	104.7421	2.0100e-003	1.9200e-003	105.3645
Single Family Housing	6.35606e+006	0.0343	0.2929	0.1246	1.8700e-003		0.0237	0.0237		0.0237	0.0237	0.0000	339.1838	339.1838	6.5000e-003	6.2200e-003	341.1994
User Defined Commercial	5.50703e+008	2.9695	26.9953	22.6760	0.1620		2.0516	2.0516		2.0516	2.0516	0.0000	29,387.6310	29,387.6310	0.5633	0.5388	29,562.2670
User Defined Industrial	1.84187e+008	0.9932	9.0288	7.5842	0.0542		0.6862	0.6862		0.6862	0.6862	0.0000	9,828.9084	9,828.9084	0.1884	0.1802	9,887.3167
Total		**4.8639**	**43.7254**	**33.5374**	**0.2653**		**3.3605**	**3.3605**		**3.3605**	**3.3605**	**0.0000**	**48,135.5373**	**48,135.5373**	**0.9226**	**0.8825**	**48,421.5827**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

5.3 Energy by Land Use - Electricity

Unmitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Apartments Low Rise	0	0.0000	0.0000	0.0000	0.0000
Apartments Mid Rise	0	0.0000	0.0000	0.0000	0.0000
Condo/Townhouse	0	0.0000	0.0000	0.0000	0.0000
Single Family Housing	0	0.0000	0.0000	0.0000	0.0000
User Defined Commercial	0	0.0000	0.0000	0.0000	0.0000
User Defined Industrial	0	0.0000	0.0000	0.0000	0.0000
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

5.3 Energy by Land Use - Electricity

Mitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Apartments Low Rise	0	0.0000	0.0000	0.0000	0.0000
Apartments Mid Rise	0	0.0000	0.0000	0.0000	0.0000
Condo/Townhouse	0	0.0000	0.0000	0.0000	0.0000
Single Family Housing	0	0.0000	0.0000	0.0000	0.0000
User Defined Commercial	0	0.0000	0.0000	0.0000	0.0000
User Defined Industrial	0	0.0000	0.0000	0.0000	0.0000
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**

6.0 Area Detail

6.1 Mitigation Measures Area

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	749.5106	6.8305	591.8643	0.0314		3.2957	3.2957		3.2957	3.2957	0.0000	971.2128	971.2128	0.9259	0.0000	994.3606
Unmitigated	749.5106	6.8305	591.8643	0.0314		3.2957	3.2957		3.2957	3.2957	0.0000	971.2128	971.2128	0.9259	0.0000	994.3606

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	216.2680					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	515.5118					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Hearth	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	17.7308	6.8305	591.8643	0.0314		3.2957	3.2957		3.2957	3.2957	0.0000	971.2128	971.2128	0.9259	0.0000	994.3606
Total	**749.5106**	**6.8305**	**591.8643**	**0.0314**		**3.2957**	**3.2957**		**3.2957**	**3.2957**	**0.0000**	**971.2128**	**971.2128**	**0.9259**	**0.0000**	**994.3606**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	216.2680					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	515.5118					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Hearth	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	17.7308	6.8305	591.8643	0.0314		3.2957	3.2957		3.2957	3.2957	0.0000	971.2128	971.2128	0.9259	0.0000	994.3606
Total	**749.5106**	**6.8305**	**591.8643**	**0.0314**		**3.2957**	**3.2957**		**3.2957**	**3.2957**	**0.0000**	**971.2128**	**971.2128**	**0.9259**	**0.0000**	**994.3606**

7.0 Water Detail

7.1 Mitigation Measures Water

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	0.0000	0.0000	0.0000	0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

7.2 Water by Land Use

Unmitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Apartments Low Rise	0 / 0	0.0000	0.0000	0.0000	0.0000
Apartments Mid Rise	0 / 0	0.0000	0.0000	0.0000	0.0000
Condo/Townhouse	0 / 0	0.0000	0.0000	0.0000	0.0000
Single Family Housing	0 / 0	0.0000	0.0000	0.0000	0.0000
User Defined Commercial	0 / 0	0.0000	0.0000	0.0000	0.0000
User Defined Industrial	0 / 0	0.0000	0.0000	0.0000	0.0000
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

7.2 Water by Land Use

Mitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Apartments Low Rise	0 / 0	0.0000	0.0000	0.0000	0.0000
Apartments Mid Rise	0 / 0	0.0000	0.0000	0.0000	0.0000
Condo/Townhouse	0 / 0	0.0000	0.0000	0.0000	0.0000
Single Family Housing	0 / 0	0.0000	0.0000	0.0000	0.0000
User Defined Commercial	0 / 0	0.0000	0.0000	0.0000	0.0000
User Defined Industrial	0 / 0	0.0000	0.0000	0.0000	0.0000
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**

8.0 Waste Detail

8.1 Mitigation Measures Waste

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Category/Year

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	24,555.2078	1,451.1712	0.0000	60,834.4880
Unmitigated	24,555.2078	1,451.1712	0.0000	60,834.4880

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

8.2 Waste by Land Use

Unmitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Apartments Low Rise	934	189.5936	11.2047	0.0000	469.7100
Apartments Mid Rise	27143	5,509.7837	325.6189	0.0000	13,650.2559
Condo/Townhouse	233	47.2969	2.7952	0.0000	117.1761
Single Family Housing	2115	429.3259	25.3724	0.0000	1,063.6367
User Defined Commercial	76044	15,436.2448	912.2559	0.0000	38,242.6431
User Defined Industrial	14498	2,942.9630	173.9241	0.0000	7,291.0662
Total		**24,555.2078**	**1,451.1712**	**0.0000**	**60,834.4880**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

8.2 Waste by Land Use

Mitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Apartments Low Rise	934	189.5936	11.2047	0.0000	469.7100
Apartments Mid Rise	27143	5,509.7837	325.6189	0.0000	13,650.2559
Condo/Townhouse	233	47.2969	2.7952	0.0000	117.1761
Single Family Housing	2115	429.3259	25.3724	0.0000	1,063.6367
User Defined Commercial	76044	15,436.2448	912.2559	0.0000	38,242.6431
User Defined Industrial	14498	2,942.9630	173.9241	0.0000	7,291.0662
Total		**24,555.2078**	**1,451.1712**	**0.0000**	**60,834.4880**

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type

Boilers

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Seattle Comprehensive Plan - Alt 2

Siskiyou County, Annual

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
User Defined Commercial	33,174.90	User Defined Unit	0.00	33,174,904.00	0
User Defined Industrial	17,710.27	User Defined Unit	0.00	17,710,268.00	0
Apartments Low Rise	1,977.00	Dwelling Unit	123.56	1,977,000.00	4053
Apartments Mid Rise	96,792.00	Dwelling Unit	2,547.16	96,792,000.00	198424
Condo/Townhouse	533.00	Dwelling Unit	33.31	533,000.00	1093
Single Family Housing	698.00	Dwelling Unit	226.62	1,256,400.00	1431

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.2	**Precipitation Freq (Days)**	85
Climate Zone	14			**Operational Year**	2045
Utility Company	Seattle City Light				
CO2 Intensity (lb/MWhr)	31.35	**CH4 Intensity (lb/MWhr)**	0.029	**N2O Intensity (lb/MWhr)**	0.006

1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Land Use - SF, 2.05 persons per DU

Construction Phase - Ops only

Vehicle Trips - Energy and Solid Waste Only

Woodstoves - Energy and Solid Waste Only

Consumer Products - Energy and Solid Waste Only

Area Coating - Energy and Solid Waste Only

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Landscape Equipment - Energy and Solid Waste Only

Energy Use - Electricity: SCL Carbon Neutral; NG: SCL, EIA

Water And Wastewater - Energy and Solid Waste Only

Solid Waste - Seattle Public Utilities, City of Seattle 2022 Solid Waste Plan Update: Moving Upstream to Zero Waste (2022-2027), December 2022

Table Name	Column Name	Default Value	New Value
tblConstructionPhase	NumDays	10,000.00	0.00
tblConstructionPhase	PhaseEndDate	11/15/2061	7/18/2023
tblEnergyUse	LightingElect	810.36	0.00
tblEnergyUse	LightingElect	741.44	0.00
tblEnergyUse	LightingElect	1,001.10	0.00
tblEnergyUse	LightingElect	1,608.84	0.00
tblEnergyUse	NT24E	3,172.76	0.00
tblEnergyUse	NT24E	3,054.10	0.00
tblEnergyUse	NT24E	3,795.01	0.00
tblEnergyUse	NT24E	6,155.97	0.00
tblEnergyUse	NT24NG	1,599.00	2,301.00
tblEnergyUse	NT24NG	1,599.00	2,028.00
tblEnergyUse	NT24NG	1,599.00	3,029.00
tblEnergyUse	NT24NG	1,599.00	4,576.00
tblEnergyUse	NT24NG	0.00	16.60
tblEnergyUse	NT24NG	0.00	10.40
tblEnergyUse	T24E	165.27	0.00
tblEnergyUse	T24E	176.92	0.00
tblEnergyUse	T24E	204.10	0.00
tblEnergyUse	T24E	191.61	0.00
tblEnergyUse	T24NG	8,768.16	0.00
tblEnergyUse	T24NG	2,182.40	0.00
tblEnergyUse	T24NG	3,351.17	0.00

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

tblEnergyUse	T24NG	9,528.86	0.00
tblFireplaces	NumberGas	1,087.35	0.00
tblFireplaces	NumberGas	53,235.60	0.00
tblFireplaces	NumberGas	293.15	0.00
tblFireplaces	NumberGas	383.90	0.00
tblFireplaces	NumberWood	691.95	0.00
tblFireplaces	NumberWood	33,877.20	0.00
tblFireplaces	NumberWood	186.55	0.00
tblFireplaces	NumberWood	244.30	0.00
tblLandUse	LandUseSquareFeet	0.00	33,174,904.00
tblLandUse	LandUseSquareFeet	0.00	17,710,268.00
tblLandUse	Population	5,654.00	4,053.00
tblLandUse	Population	276,825.00	198,424.00
tblLandUse	Population	1,524.00	1,093.00
tblLandUse	Population	1,996.00	1,431.00
tblSolidWaste	SolidWasteGenerationRate	909.42	712.00
tblSolidWaste	SolidWasteGenerationRate	44,524.32	34,858.00
tblSolidWaste	SolidWasteGenerationRate	245.18	192.00
tblSolidWaste	SolidWasteGenerationRate	357.75	1,063.00
tblSolidWaste	SolidWasteGenerationRate	0.00	76,044.00
tblSolidWaste	SolidWasteGenerationRate	0.00	14,498.00
tblVehicleTrips	ST_TR	8.14	0.00
tblVehicleTrips	ST_TR	4.91	0.00
tblVehicleTrips	ST_TR	8.14	0.00
tblVehicleTrips	ST_TR	9.54	0.00
tblVehicleTrips	SU_TR	6.28	0.00
tblVehicleTrips	SU_TR	4.09	0.00
tblVehicleTrips	SU_TR	6.28	0.00
tblVehicleTrips	SU_TR	8.55	0.00

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

tblVehicleTrips	WD_TR	7.32	0.00
tblVehicleTrips	WD_TR	5.44	0.00
tblVehicleTrips	WD_TR	7.32	0.00
tblVehicleTrips	WD_TR	9.44	0.00
tblWater	IndoorWaterUseRate	128,809,508.65	0.00
tblWater	IndoorWaterUseRate	6,306,388,447.95	0.00
tblWater	IndoorWaterUseRate	34,727,095.66	0.00
tblWater	IndoorWaterUseRate	45,477,509.88	0.00
tblWater	OutdoorWaterUseRate	81,205,994.59	0.00
tblWater	OutdoorWaterUseRate	3,975,766,630.23	0.00
tblWater	OutdoorWaterUseRate	21,893,169.00	0.00
tblWater	OutdoorWaterUseRate	28,670,604.06	0.00
tblWoodstoves	NumberCatalytic	98.85	0.00
tblWoodstoves	NumberCatalytic	4,839.60	0.00
tblWoodstoves	NumberCatalytic	26.65	0.00
tblWoodstoves	NumberCatalytic	34.90	0.00
tblWoodstoves	NumberNoncatalytic	98.85	0.00
tblWoodstoves	NumberNoncatalytic	4,839.60	0.00
tblWoodstoves	NumberNoncatalytic	26.65	0.00
tblWoodstoves	NumberNoncatalytic	34.90	0.00

2.0 Emissions Summary

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

2.1 Overall Construction

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2023	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Maximum	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2023	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Maximum	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOX (tons/quarter)	Maximum Mitigated ROG + NOX (tons/quarter)

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

		Highest		

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	829.8837	8.5370	739.7142	0.0392		4.1193	4.1193		4.1193	4.1193	0.0000	1,213.7887	1,213.7887	1.1568	0.0000	1,242.7088
Energy	5.0716	45.5001	34.2926	0.2766		3.5040	3.5040		3.5040	3.5040	0.0000	50,190.9003	50,190.9003	0.9620	0.9202	50,489.1598
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Waste						0.0000	0.0000		0.0000	0.0000	25,854.3500	0.0000	25,854.3500	1,527.9483	0.0000	64,053.0577
Water						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**834.9553**	**54.0372**	**774.0068**	**0.3159**	**0.0000**	**7.6233**	**7.6233**	**0.0000**	**7.6233**	**7.6233**	**25,854.3500**	**51,404.6890**	**77,259.0390**	**1,530.0671**	**0.9202**	**115,784.9263**

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

2.2 Overall Operational

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	829.8837	8.5370	739.7142	0.0392		4.1193	4.1193		4.1193	4.1193	0.0000	1,213.7887	1,213.7887	1.1568	0.0000	1,242.7088
Energy	5.0716	45.5001	34.2926	0.2766		3.5040	3.5040		3.5040	3.5040	0.0000	50,190.9003	50,190.9003	0.9620	0.9202	50,489.1598
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Waste						0.0000	0.0000		0.0000	0.0000	25,854.3500	0.0000	25,854.3500	1,527.9483	0.0000	64,053.0577
Water						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**834.9553**	**54.0372**	**774.0068**	**0.3159**	**0.0000**	**7.6233**	**7.6233**	**0.0000**	**7.6233**	**7.6233**	**25,854.3500**	**51,404.6890**	**77,259.0390**	**1,530.0671**	**0.9202**	**115,784.9263**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	7/19/2023	7/18/2023	5	0	

Acres of Grading (Site Preparation Phase): 0

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Acres of Grading (Grading Phase): 0

Acres of Paving: 0

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area: 0 (Architectural Coating – sqft)

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Demolition	Excavators	3	8.00	158	0.38
Demolition	Rubber Tired Dozers	2	8.00	247	0.40

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	6	15.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.2 Demolition - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.2 Demolition - 2023

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

4.0 Operational Detail - Mobile

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Apartments Low Rise	0.00	0.00	0.00		
Apartments Mid Rise	0.00	0.00	0.00		
Condo/Townhouse	0.00	0.00	0.00		
Single Family Housing	0.00	0.00	0.00		
User Defined Commercial	0.00	0.00	0.00		
User Defined Industrial	0.00	0.00	0.00		
Total	0.00	0.00	0.00		

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Apartments Low Rise	10.80	7.30	7.50	42.30	19.60	38.10	86	11	3
Apartments Mid Rise	10.80	7.30	7.50	42.30	19.60	38.10	86	11	3
Condo/Townhouse	10.80	7.30	7.50	42.30	19.60	38.10	86	11	3

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Single Family Housing	10.80	7.30	7.50	42.30	19.60	38.10	86	11	3
User Defined Commercial	9.50	7.30	7.30	0.00	0.00	0.00	0	0	0
User Defined Industrial	9.50	7.30	7.30	0.00	0.00	0.00	0	0	0

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Apartments Low Rise	0.534542	0.059637	0.191637	0.128334	0.022737	0.006209	0.003994	0.022357	0.000379	0.000132	0.026770	0.000794	0.002479
Apartments Mid Rise	0.534542	0.059637	0.191637	0.128334	0.022737	0.006209	0.003994	0.022357	0.000379	0.000132	0.026770	0.000794	0.002479
Condo/Townhouse	0.534542	0.059637	0.191637	0.128334	0.022737	0.006209	0.003994	0.022357	0.000379	0.000132	0.026770	0.000794	0.002479
Single Family Housing	0.534542	0.059637	0.191637	0.128334	0.022737	0.006209	0.003994	0.022357	0.000379	0.000132	0.026770	0.000794	0.002479
User Defined Commercial	0.534542	0.059637	0.191637	0.128334	0.022737	0.006209	0.003994	0.022357	0.000379	0.000132	0.026770	0.000794	0.002479
User Defined Industrial	0.534542	0.059637	0.191637	0.128334	0.022737	0.006209	0.003994	0.022357	0.000379	0.000132	0.026770	0.000794	0.002479

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Electricity Mitigated						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
NaturalGas Mitigated	5.0716	45.5001	34.2926	0.2766		3.5040	3.5040		3.5040	3.5040	0.0000	50,190.9003	50,190.9003	0.9620	0.9202	50,489.1598
NaturalGas Unmitigated	5.0716	45.5001	34.2926	0.2766		3.5040	3.5040		3.5040	3.5040	0.0000	50,190.9003	50,190.9003	0.9620	0.9202	50,489.1598

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Apartments Low Rise	4.54908e+006	0.0245	0.2096	0.0892	1.3400e-003		0.0170	0.0170		0.0170	0.0170	0.0000	242.7561	242.7561	4.6500e-003	4.4500e-003	244.1987
Apartments Mid Rise	1.96294e+008	1.0585	9.0449	3.8489	0.0577		0.7313	0.7313		0.7313	0.7313	0.0000	10,475.0048	10,475.0048	0.2008	0.1920	10,537.2525
Condo/Townhouse	1.61446e+006	8.7100e-003	0.0744	0.0317	4.7000e-004		6.0100e-003	6.0100e-003		6.0100e-003	6.0100e-003	0.0000	86.1536	86.1536	1.6500e-003	1.5800e-003	86.6655
Single Family Housing	3.19405e+006	0.0172	0.1472	0.0626	9.4000e-004		0.0119	0.0119		0.0119	0.0119	0.0000	170.4466	170.4466	3.2700e-003	3.1200e-003	171.4594
User Defined Commercial	5.50703e+008	2.9695	26.9953	22.6760	0.1620		2.0516	2.0516		2.0516	2.0516	0.0000	29,387.6310	29,387.6310	0.5633	0.5388	29,562.2670
User Defined Industrial	1.84187e+008	0.9932	9.0288	7.5842	0.0542		0.6862	0.6862		0.6862	0.6862	0.0000	9,828.9084	9,828.9084	0.1884	0.1802	9,887.3167
Total		**5.0716**	**45.5001**	**34.2926**	**0.2766**		**3.5040**	**3.5040**		**3.5040**	**3.5040**	**0.0000**	**50,190.9003**	**50,190.9003**	**0.9620**	**0.9202**	**50,489.1598**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

5.2 Energy by Land Use - NaturalGas

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Apartments Low Rise	4.54908e+006	0.0245	0.2096	0.0892	1.3400e-003		0.0170	0.0170		0.0170	0.0170	0.0000	242.7561	242.7561	4.6500e-003	4.4500e-003	244.1987
Apartments Mid Rise	1.96294e+008	1.0585	9.0449	3.8489	0.0577		0.7313	0.7313		0.7313	0.7313	0.0000	10,475.0048	10,475.0048	0.2008	0.1920	10,537.2525
Condo/Townhouse	1.61446e+006	8.7100e-003	0.0744	0.0317	4.7000e-004		6.0100e-003	6.0100e-003		6.0100e-003	6.0100e-003	0.0000	86.1536	86.1536	1.6500e-003	1.5800e-003	86.6655
Single Family Housing	3.19405e+006	0.0172	0.1472	0.0626	9.4000e-004		0.0119	0.0119		0.0119	0.0119	0.0000	170.4466	170.4466	3.2700e-003	3.1200e-003	171.4594
User Defined Commercial	5.50703e+008	2.9695	26.9953	22.6760	0.1620		2.0516	2.0516		2.0516	2.0516	0.0000	29,387.6310	29,387.6310	0.5633	0.5388	29,562.2670
User Defined Industrial	1.84187e+008	0.9932	9.0288	7.5842	0.0542		0.6862	0.6862		0.6862	0.6862	0.0000	9,828.9084	9,828.9084	0.1884	0.1802	9,887.3167
Total		**5.0716**	**45.5001**	**34.2926**	**0.2766**		**3.5040**	**3.5040**		**3.5040**	**3.5040**	**0.0000**	**50,190.9003**	**50,190.9003**	**0.9620**	**0.9202**	**50,489.1598**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

5.3 Energy by Land Use - Electricity

Unmitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Apartments Low Rise	0	0.0000	0.0000	0.0000	0.0000
Apartments Mid Rise	0	0.0000	0.0000	0.0000	0.0000
Condo/Townhouse	0	0.0000	0.0000	0.0000	0.0000
Single Family Housing	0	0.0000	0.0000	0.0000	0.0000
User Defined Commercial	0	0.0000	0.0000	0.0000	0.0000
User Defined Industrial	0	0.0000	0.0000	0.0000	0.0000
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

5.3 Energy by Land Use - Electricity

Mitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Apartments Low Rise	0	0.0000	0.0000	0.0000	0.0000
Apartments Mid Rise	0	0.0000	0.0000	0.0000	0.0000
Condo/Townhouse	0	0.0000	0.0000	0.0000	0.0000
Single Family Housing	0	0.0000	0.0000	0.0000	0.0000
User Defined Commercial	0	0.0000	0.0000	0.0000	0.0000
User Defined Industrial	0	0.0000	0.0000	0.0000	0.0000
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**

6.0 Area Detail

6.1 Mitigation Measures Area

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	829.8837	8.5370	739.7142	0.0392		4.1193	4.1193		4.1193	4.1193	0.0000	1,213.7887	1,213.7887	1.1568	0.0000	1,242.7088
Unmitigated	829.8837	8.5370	739.7142	0.0392		4.1193	4.1193		4.1193	4.1193	0.0000	1,213.7887	1,213.7887	1.1568	0.0000	1,242.7088

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	216.2680					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	591.4629					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Hearth	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	22.1529	8.5370	739.7142	0.0392		4.1193	4.1193		4.1193	4.1193	0.0000	1,213.7887	1,213.7887	1.1568	0.0000	1,242.7088
Total	**829.8837**	**8.5370**	**739.7142**	**0.0392**		**4.1193**	**4.1193**		**4.1193**	**4.1193**	**0.0000**	**1,213.7887**	**1,213.7887**	**1.1568**	**0.0000**	**1,242.7088**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	216.2680					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	591.4629					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Hearth	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	22.1529	8.5370	739.7142	0.0392		4.1193	4.1193		4.1193	4.1193	0.0000	1,213.7887	1,213.7887	1.1568	0.0000	1,242.7088
Total	**829.8837**	**8.5370**	**739.7142**	**0.0392**		**4.1193**	**4.1193**		**4.1193**	**4.1193**	**0.0000**	**1,213.7887**	**1,213.7887**	**1.1568**	**0.0000**	**1,242.7088**

7.0 Water Detail

7.1 Mitigation Measures Water

Seattle Comprehensive Plan - Alt 2 - Siskiyou County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	0.0000	0.0000	0.0000	0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

7.2 Water by Land Use

Unmitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Apartments Low Rise	0 / 0	0.0000	0.0000	0.0000	0.0000
Apartments Mid Rise	0 / 0	0.0000	0.0000	0.0000	0.0000
Condo/Townhouse	0 / 0	0.0000	0.0000	0.0000	0.0000
Single Family Housing	0 / 0	0.0000	0.0000	0.0000	0.0000
User Defined Commercial	0 / 0	0.0000	0.0000	0.0000	0.0000
User Defined Industrial	0 / 0	0.0000	0.0000	0.0000	0.0000
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

7.2 Water by Land Use

Mitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Apartments Low Rise	0 / 0	0.0000	0.0000	0.0000	0.0000
Apartments Mid Rise	0 / 0	0.0000	0.0000	0.0000	0.0000
Condo/Townhouse	0 / 0	0.0000	0.0000	0.0000	0.0000
Single Family Housing	0 / 0	0.0000	0.0000	0.0000	0.0000
User Defined Commercial	0 / 0	0.0000	0.0000	0.0000	0.0000
User Defined Industrial	0 / 0	0.0000	0.0000	0.0000	0.0000
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**

8.0 Waste Detail

8.1 Mitigation Measures Waste

Seattle Comprehensive Plan - Alt 2 - Siskiyou County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Category/Year

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	25,854.3500	1,527.9483	0.0000	64,053.0577
Unmitigated	25,854.3500	1,527.9483	0.0000	64,053.0577

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

8.2 Waste by Land Use

Unmitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Apartments Low Rise	712	144.5296	8.5415	0.0000	358.0659
Apartments Mid Rise	34858	7,075.8590	418.1713	0.0000	17,530.1411
Condo/Townhouse	192	38.9743	2.3033	0.0000	96.5571
Single Family Housing	1063	215.7794	12.7522	0.0000	534.5843
User Defined Commercial	76044	15,436.2448	912.2559	0.0000	38,242.6431
User Defined Industrial	14498	2,942.9630	173.9241	0.0000	7,291.0662
Total		**25,854.3500**	**1,527.9483**	**0.0000**	**64,053.0577**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

8.2 Waste by Land Use

Mitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Apartments Low Rise	712	144.5296	8.5415	0.0000	358.0659
Apartments Mid Rise	34858	7,075.8590	418.1713	0.0000	17,530.1411
Condo/Townhouse	192	38.9743	2.3033	0.0000	96.5571
Single Family Housing	1063	215.7794	12.7522	0.0000	534.5843
User Defined Commercial	76044	15,436.2448	912.2559	0.0000	38,242.6431
User Defined Industrial	14498	2,942.9630	173.9241	0.0000	7,291.0662
Total		**25,854.3500**	**1,527.9483**	**0.0000**	**64,053.0577**

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type

Boilers

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

Seattle Comprehensive Plan - Alt 3 - Siskiyou County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Seattle Comprehensive Plan - Alt 3

Siskiyou County, Annual

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
User Defined Commercial	33,174.90	User Defined Unit	0.00	33,174,904.00	0
User Defined Industrial	17,710.27	User Defined Unit	0.00	17,710,268.00	0
Apartments Low Rise	14,247.00	Dwelling Unit	890.44	14,247,000.00	29206
Apartments Mid Rise	80,382.00	Dwelling Unit	2,115.32	80,382,000.00	164783
Condo/Townhouse	4,260.00	Dwelling Unit	266.25	4,260,000.00	8733
Single Family Housing	1,111.00	Dwelling Unit	360.71	1,999,800.00	2278

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.2	**Precipitation Freq (Days)**	85
Climate Zone	14			**Operational Year**	2045
Utility Company	Seattle City Light				
CO2 Intensity (lb/MWhr)	31.35	**CH4 Intensity (lb/MWhr)**	0.029	**N2O Intensity (lb/MWhr)**	0.006

1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Land Use - SF, 2.05 persons per DU

Construction Phase - Ops only

Vehicle Trips - Energy and Solid Waste Only

Woodstoves - Energy and Solid Waste Only

Consumer Products - Energy and Solid Waste Only

Area Coating - Energy and Solid Waste Only

Seattle Comprehensive Plan - Alt 3 - Siskiyou County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Landscape Equipment - Energy and Solid Waste Only

Energy Use - Electricity: SCL Carbon Neutral; NG: SCL, EIA

Water And Wastewater - Energy and Solid Waste Only

Solid Waste - Seattle Public Utilities, City of Seattle 2022 Solid Waste Plan Update: Moving Upstream to Zero Waste (2022-2027), December 2022

Table Name	Column Name	Default Value	New Value
tblConstructionPhase	NumDays	10,000.00	0.00
tblConstructionPhase	PhaseEndDate	11/15/2061	7/18/2023
tblEnergyUse	LightingElect	810.36	0.00
tblEnergyUse	LightingElect	741.44	0.00
tblEnergyUse	LightingElect	1,001.10	0.00
tblEnergyUse	LightingElect	1,608.84	0.00
tblEnergyUse	NT24E	3,172.76	0.00
tblEnergyUse	NT24E	3,054.10	0.00
tblEnergyUse	NT24E	3,795.01	0.00
tblEnergyUse	NT24E	6,155.97	0.00
tblEnergyUse	NT24NG	1,599.00	2,301.00
tblEnergyUse	NT24NG	1,599.00	2,028.00
tblEnergyUse	NT24NG	1,599.00	3,029.00
tblEnergyUse	NT24NG	1,599.00	4,576.00
tblEnergyUse	NT24NG	0.00	16.60
tblEnergyUse	NT24NG	0.00	10.40
tblEnergyUse	T24E	165.27	0.00
tblEnergyUse	T24E	176.92	0.00
tblEnergyUse	T24E	204.10	0.00
tblEnergyUse	T24E	191.61	0.00
tblEnergyUse	T24NG	8,768.16	0.00
tblEnergyUse	T24NG	2,182.40	0.00
tblEnergyUse	T24NG	3,351.17	0.00

Seattle Comprehensive Plan - Alt 3 - Siskiyou County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

tblEnergyUse	T24NG	9,528.86	0.00
tblFireplaces	NumberGas	1,087.35	0.00
tblFireplaces	NumberGas	53,235.60	0.00
tblFireplaces	NumberGas	293.15	0.00
tblFireplaces	NumberGas	383.90	0.00
tblFireplaces	NumberWood	691.95	0.00
tblFireplaces	NumberWood	33,877.20	0.00
tblFireplaces	NumberWood	186.55	0.00
tblFireplaces	NumberWood	244.30	0.00
tblLandUse	LandUseSquareFeet	0.00	33,174,904.00
tblLandUse	LandUseSquareFeet	0.00	17,710,268.00
tblLandUse	Population	40,746.00	29,206.00
tblLandUse	Population	229,893.00	164,783.00
tblLandUse	Population	12,184.00	8,733.00
tblLandUse	Population	3,177.00	2,278.00
tblSolidWaste	SolidWasteGenerationRate	909.42	5,131.00
tblSolidWaste	SolidWasteGenerationRate	44,524.32	28,948.00
tblSolidWaste	SolidWasteGenerationRate	245.18	1,534.00
tblSolidWaste	SolidWasteGenerationRate	357.75	1,692.00
tblSolidWaste	SolidWasteGenerationRate	0.00	76,044.00
tblSolidWaste	SolidWasteGenerationRate	0.00	14,498.00
tblVehicleTrips	ST_TR	8.14	0.00
tblVehicleTrips	ST_TR	4.91	0.00
tblVehicleTrips	ST_TR	8.14	0.00
tblVehicleTrips	ST_TR	9.54	0.00
tblVehicleTrips	SU_TR	6.28	0.00
tblVehicleTrips	SU_TR	4.09	0.00
tblVehicleTrips	SU_TR	6.28	0.00
tblVehicleTrips	SU_TR	8.55	0.00

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

tblVehicleTrips	WD_TR	7.32	0.00
tblVehicleTrips	WD_TR	5.44	0.00
tblVehicleTrips	WD_TR	7.32	0.00
tblVehicleTrips	WD_TR	9.44	0.00
tblWater	IndoorWaterUseRate	128,809,508.65	0.00
tblWater	IndoorWaterUseRate	6,306,388,447.95	0.00
tblWater	IndoorWaterUseRate	34,727,095.66	0.00
tblWater	IndoorWaterUseRate	45,477,509.88	0.00
tblWater	OutdoorWaterUseRate	81,205,994.59	0.00
tblWater	OutdoorWaterUseRate	3,975,766,630.23	0.00
tblWater	OutdoorWaterUseRate	21,893,169.00	0.00
tblWater	OutdoorWaterUseRate	28,670,604.06	0.00
tblWoodstoves	NumberCatalytic	98.85	0.00
tblWoodstoves	NumberCatalytic	4,839.60	0.00
tblWoodstoves	NumberCatalytic	26.65	0.00
tblWoodstoves	NumberCatalytic	34.90	0.00
tblWoodstoves	NumberNoncatalytic	98.85	0.00
tblWoodstoves	NumberNoncatalytic	4,839.60	0.00
tblWoodstoves	NumberNoncatalytic	26.65	0.00
tblWoodstoves	NumberNoncatalytic	34.90	0.00

2.0 Emissions Summary

Seattle Comprehensive Plan - Alt 3 - Siskiyou County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

2.1 Overall Construction

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2023	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Maximum	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2023	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Maximum	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOX (tons/quarter)	Maximum Mitigated ROG + NOX (tons/quarter)

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

		Highest		

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	831.1741	8.5370	739.7142	0.0392		4.1193	4.1193		4.1193	4.1193	0.0000	1,213.7887	1,213.7887	1.1568	0.0000	1,242.7088
Energy	5.1154	45.8749	34.4520	0.2790		3.5343	3.5343		3.5343	3.5343	0.0000	50,624.8954	50,624.8954	0.9703	0.9281	50,925.7339
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Waste						0.0000	0.0000		0.0000	0.0000	25,951.7856	0.0000	25,951.7856	1,533.7066	0.0000	64,294.4504
Water						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**836.2895**	**54.4119**	**774.1662**	**0.3183**	**0.0000**	**7.6536**	**7.6536**	**0.0000**	**7.6536**	**7.6536**	**25,951.7856**	**51,838.6841**	**77,790.4697**	**1,535.8337**	**0.9281**	**116,462.8931**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

2.2 Overall Operational

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	831.1741	8.5370	739.7142	0.0392		4.1193	4.1193		4.1193	4.1193	0.0000	1,213.7887	1,213.7887	1.1568	0.0000	1,242.7088
Energy	5.1154	45.8749	34.4520	0.2790		3.5343	3.5343		3.5343	3.5343	0.0000	50,624.8954	50,624.8954	0.9703	0.9281	50,925.7339
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Waste						0.0000	0.0000		0.0000	0.0000	25,951.7856	0.0000	25,951.7856	1,533.7066	0.0000	64,294.4504
Water						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**836.2895**	**54.4119**	**774.1662**	**0.3183**	**0.0000**	**7.6536**	**7.6536**	**0.0000**	**7.6536**	**7.6536**	**25,951.7856**	**51,838.6841**	**77,790.4697**	**1,535.8337**	**0.9281**	**116,462.8931**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	7/19/2023	7/18/2023	5	0	

Acres of Grading (Site Preparation Phase): 0

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Acres of Grading (Grading Phase): 0

Acres of Paving: 0

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area: 0 (Architectural Coating – sqft)

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Demolition	Excavators	3	8.00	158	0.38
Demolition	Rubber Tired Dozers	2	8.00	247	0.40

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	6	15.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

Seattle Comprehensive Plan - Alt 3 - Siskiyou County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.2 Demolition - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.2 Demolition - 2023

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

Seattle Comprehensive Plan - Alt 3 - Siskiyou County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Apartments Low Rise	0.00	0.00	0.00		
Apartments Mid Rise	0.00	0.00	0.00		
Condo/Townhouse	0.00	0.00	0.00		
Single Family Housing	0.00	0.00	0.00		
User Defined Commercial	0.00	0.00	0.00		
User Defined Industrial	0.00	0.00	0.00		
Total	0.00	0.00	0.00		

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Apartments Low Rise	10.80	7.30	7.50	42.30	19.60	38.10	86	11	3
Apartments Mid Rise	10.80	7.30	7.50	42.30	19.60	38.10	86	11	3
Condo/Townhouse	10.80	7.30	7.50	42.30	19.60	38.10	86	11	3

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Single Family Housing	10.80	7.30	7.50	42.30	19.60	38.10	86	11	3
User Defined Commercial	9.50	7.30	7.30	0.00	0.00	0.00	0	0	0
User Defined Industrial	9.50	7.30	7.30	0.00	0.00	0.00	0	0	0

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Apartments Low Rise	0.534542	0.059637	0.191637	0.128334	0.022737	0.006209	0.003994	0.022357	0.000379	0.000132	0.026770	0.000794	0.002479
Apartments Mid Rise	0.534542	0.059637	0.191637	0.128334	0.022737	0.006209	0.003994	0.022357	0.000379	0.000132	0.026770	0.000794	0.002479
Condo/Townhouse	0.534542	0.059637	0.191637	0.128334	0.022737	0.006209	0.003994	0.022357	0.000379	0.000132	0.026770	0.000794	0.002479
Single Family Housing	0.534542	0.059637	0.191637	0.128334	0.022737	0.006209	0.003994	0.022357	0.000379	0.000132	0.026770	0.000794	0.002479
User Defined Commercial	0.534542	0.059637	0.191637	0.128334	0.022737	0.006209	0.003994	0.022357	0.000379	0.000132	0.026770	0.000794	0.002479
User Defined Industrial	0.534542	0.059637	0.191637	0.128334	0.022737	0.006209	0.003994	0.022357	0.000379	0.000132	0.026770	0.000794	0.002479

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

Seattle Comprehensive Plan - Alt 3 - Siskiyou County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Electricity Mitigated						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
NaturalGas Mitigated	5.1154	45.8749	34.4520	0.2790		3.5343	3.5343		3.5343	3.5343	0.0000	50,624.8954	50,624.8954	0.9703	0.9281	50,925.7339
NaturalGas Unmitigated	5.1154	45.8749	34.4520	0.2790		3.5343	3.5343		3.5343	3.5343	0.0000	50,624.8954	50,624.8954	0.9703	0.9281	50,925.7339

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Apartments Low Rise	3.27823e+007	0.1768	1.5106	0.6428	9.6400e-003		0.1221	0.1221		0.1221	0.1221	0.0000	1,749.3909	1,749.3909	0.0335	0.0321	1,759.7866
Apartments Mid Rise	1.63015e+008	0.8790	7.5115	3.1964	0.0480		0.6073	0.6073		0.6073	0.6073	0.0000	8,699.0850	8,699.0850	0.1667	0.1595	8,750.7793
Condo/Townhouse	1.29035e+007	0.0696	0.5946	0.2530	3.8000e-003		0.0481	0.0481		0.0481	0.0481	0.0000	688.5820	688.5820	0.0132	0.0126	692.6739
Single Family Housing	5.08394e+006	0.0274	0.2343	0.0997	1.5000e-003		0.0189	0.0189		0.0189	0.0189	0.0000	271.2982	271.2982	5.2000e-003	4.9700e-003	272.9104
User Defined Commercial	5.50703e+008	2.9695	26.9953	22.6760	0.1620		2.0516	2.0516		2.0516	2.0516	0.0000	29,387.6310	29,387.6310	0.5633	0.5388	29,562.2670
User Defined Industrial	1.84187e+008	0.9932	9.0288	7.5842	0.0542		0.6862	0.6862		0.6862	0.6862	0.0000	9,828.9084	9,828.9084	0.1884	0.1802	9,887.3167
Total		**5.1154**	**45.8749**	**34.4520**	**0.2790**		**3.5343**	**3.5343**		**3.5343**	**3.5343**	**0.0000**	**50,624.8954**	**50,624.8954**	**0.9703**	**0.9281**	**50,925.7339**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

5.2 Energy by Land Use - NaturalGas

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Apartments Low Rise	3.27823e+007	0.1768	1.5106	0.6428	9.6400e-003		0.1221	0.1221		0.1221	0.1221	0.0000	1,749.3909	1,749.3909	0.0335	0.0321	1,759.7866
Apartments Mid Rise	1.63015e+008	0.8790	7.5115	3.1964	0.0480		0.6073	0.6073		0.6073	0.6073	0.0000	8,699.0850	8,699.0850	0.1667	0.1595	8,750.7793
Condo/Townhouse	1.29035e+007	0.0696	0.5946	0.2530	3.8000e-003		0.0481	0.0481		0.0481	0.0481	0.0000	688.5820	688.5820	0.0132	0.0126	692.6739
Single Family Housing	5.08394e+006	0.0274	0.2343	0.0997	1.5000e-003		0.0189	0.0189		0.0189	0.0189	0.0000	271.2982	271.2982	5.2000e-003	4.9700e-003	272.9104
User Defined Commercial	5.50703e+008	2.9695	26.9953	22.6760	0.1620		2.0516	2.0516		2.0516	2.0516	0.0000	29,387.6310	29,387.6310	0.5633	0.5388	29,562.2670
User Defined Industrial	1.84187e+008	0.9932	9.0288	7.5842	0.0542		0.6862	0.6862		0.6862	0.6862	0.0000	9,828.9084	9,828.9084	0.1884	0.1802	9,887.3167
Total		**5.1154**	**45.8749**	**34.4520**	**0.2790**		**3.5343**	**3.5343**		**3.5343**	**3.5343**	**0.0000**	**50,624.8954**	**50,624.8954**	**0.9703**	**0.9281**	**50,925.7339**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

5.3 Energy by Land Use - Electricity

Unmitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Apartments Low Rise	0	0.0000	0.0000	0.0000	0.0000
Apartments Mid Rise	0	0.0000	0.0000	0.0000	0.0000
Condo/Townhouse	0	0.0000	0.0000	0.0000	0.0000
Single Family Housing	0	0.0000	0.0000	0.0000	0.0000
User Defined Commercial	0	0.0000	0.0000	0.0000	0.0000
User Defined Industrial	0	0.0000	0.0000	0.0000	0.0000
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

5.3 Energy by Land Use - Electricity

Mitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Apartments Low Rise	0	0.0000	0.0000	0.0000	0.0000
Apartments Mid Rise	0	0.0000	0.0000	0.0000	0.0000
Condo/Townhouse	0	0.0000	0.0000	0.0000	0.0000
Single Family Housing	0	0.0000	0.0000	0.0000	0.0000
User Defined Commercial	0	0.0000	0.0000	0.0000	0.0000
User Defined Industrial	0	0.0000	0.0000	0.0000	0.0000
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**

6.0 Area Detail

6.1 Mitigation Measures Area

Seattle Comprehensive Plan - Alt 3 - Siskiyou County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	831.1741	8.5370	739.7142	0.0392		4.1193	4.1193		4.1193	4.1193	0.0000	1,213.7887	1,213.7887	1.1568	0.0000	1,242.7088
Unmitigated	831.1741	8.5370	739.7142	0.0392		4.1193	4.1193		4.1193	4.1193	0.0000	1,213.7887	1,213.7887	1.1568	0.0000	1,242.7088

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	216.2680					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	592.7533					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Hearth	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	22.1529	8.5370	739.7142	0.0392		4.1193	4.1193		4.1193	4.1193	0.0000	1,213.7887	1,213.7887	1.1568	0.0000	1,242.7088
Total	**831.1741**	**8.5370**	**739.7142**	**0.0392**		**4.1193**	**4.1193**		**4.1193**	**4.1193**	**0.0000**	**1,213.7887**	**1,213.7887**	**1.1568**	**0.0000**	**1,242.7088**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	216.2680					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	592.7533					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Hearth	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	22.1529	8.5370	739.7142	0.0392		4.1193	4.1193		4.1193	4.1193	0.0000	1,213.7887	1,213.7887	1.1568	0.0000	1,242.7088
Total	**831.1741**	**8.5370**	**739.7142**	**0.0392**		**4.1193**	**4.1193**		**4.1193**	**4.1193**	**0.0000**	**1,213.7887**	**1,213.7887**	**1.1568**	**0.0000**	**1,242.7088**

7.0 Water Detail

7.1 Mitigation Measures Water

Seattle Comprehensive Plan - Alt 3 - Siskiyou County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	0.0000	0.0000	0.0000	0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

7.2 Water by Land Use

Unmitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Apartments Low Rise	0 / 0	0.0000	0.0000	0.0000	0.0000
Apartments Mid Rise	0 / 0	0.0000	0.0000	0.0000	0.0000
Condo/Townhouse	0 / 0	0.0000	0.0000	0.0000	0.0000
Single Family Housing	0 / 0	0.0000	0.0000	0.0000	0.0000
User Defined Commercial	0 / 0	0.0000	0.0000	0.0000	0.0000
User Defined Industrial	0 / 0	0.0000	0.0000	0.0000	0.0000
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

7.2 Water by Land Use

Mitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Apartments Low Rise	0 / 0	0.0000	0.0000	0.0000	0.0000
Apartments Mid Rise	0 / 0	0.0000	0.0000	0.0000	0.0000
Condo/Townhouse	0 / 0	0.0000	0.0000	0.0000	0.0000
Single Family Housing	0 / 0	0.0000	0.0000	0.0000	0.0000
User Defined Commercial	0 / 0	0.0000	0.0000	0.0000	0.0000
User Defined Industrial	0 / 0	0.0000	0.0000	0.0000	0.0000
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**

8.0 Waste Detail

8.1 Mitigation Measures Waste

Seattle Comprehensive Plan - Alt 3 - Siskiyou County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Category/Year

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	25,951.7856	1,533.7066	0.0000	64,294.4504
Unmitigated	25,951.7856	1,533.7066	0.0000	64,294.4504

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

8.2 Waste by Land Use

Unmitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Apartments Low Rise	5131	1,041.5466	61.5536	0.0000	2,580.3877
Apartments Mid Rise	28948	5,876.1824	347.2724	0.0000	14,557.9932
Condo/Townhouse	1534	311.3881	18.4025	0.0000	771.4509
Single Family Housing	1692	343.4607	20.2980	0.0000	850.9094
User Defined Commercial	76044	15,436.2448	912.2559	0.0000	38,242.6431
User Defined Industrial	14498	2,942.9630	173.9241	0.0000	7,291.0662
Total		**25,951.7856**	**1,533.7066**	**0.0000**	**64,294.4505**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

8.2 Waste by Land Use

Mitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Apartments Low Rise	5131	1,041.5466	61.5536	0.0000	2,580.3877
Apartments Mid Rise	28948	5,876.1824	347.2724	0.0000	14,557.9932
Condo/Townhouse	1534	311.3881	18.4025	0.0000	771.4509
Single Family Housing	1692	343.4607	20.2980	0.0000	850.9094
User Defined Commercial	76044	15,436.2448	912.2559	0.0000	38,242.6431
User Defined Industrial	14498	2,942.9630	173.9241	0.0000	7,291.0662
Total		**25,951.7856**	**1,533.7066**	**0.0000**	**64,294.4505**

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type

Boilers

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Seattle Comprehensive Plan - Alt 4

Siskiyou County, Annual

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
User Defined Commercial	33,174.90	User Defined Unit	0.00	33,174,904.00	0
User Defined Industrial	17,710.27	User Defined Unit	0.00	17,710,268.00	0
Apartments Low Rise	5,522.00	Dwelling Unit	345.13	5,522,000.00	11320
Apartments Mid Rise	91,789.00	Dwelling Unit	2,415.50	91,789,000.00	188167
Condo/Townhouse	1,578.00	Dwelling Unit	98.63	1,578,000.00	
Single Family Housing	1,111.00	Dwelling Unit	360.71	1,999,800.00	2278

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.2	**Precipitation Freq (Days)**	85
Climate Zone	14			**Operational Year**	2045
Utility Company	Seattle City Light				
CO2 Intensity (lb/MWhr)	31.35	**CH4 Intensity (lb/MWhr)**	0.029	**N2O Intensity (lb/MWhr)**	0.006

1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Land Use - SF, 2.05 persons per DU

Construction Phase - Ops only

Vehicle Trips - Energy and Solid Waste Only

Woodstoves - Energy and Solid Waste Only

Consumer Products - Energy and Solid Waste Only

Area Coating - Energy and Solid Waste Only

Seattle Comprehensive Plan - Alt 4 - Siskiyou County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Landscape Equipment - Energy and Solid Waste Only

Energy Use - Electricity: SCL Carbon Neutral; NG: SCL, EIA

Water And Wastewater - Energy and Solid Waste Only

Solid Waste - Seattle Public Utilities, City of Seattle 2022 Solid Waste Plan Update: Moving Upstream to Zero Waste (2022-2027), December 2022

Table Name	Column Name	Default Value	New Value
tblConstructionPhase	NumDays	10,000.00	0.00
tblConstructionPhase	PhaseEndDate	11/15/2061	7/18/2023
tblEnergyUse	LightingElect	810.36	0.00
tblEnergyUse	LightingElect	741.44	0.00
tblEnergyUse	LightingElect	1,001.10	0.00
tblEnergyUse	LightingElect	1,608.84	0.00
tblEnergyUse	NT24E	3,172.76	0.00
tblEnergyUse	NT24E	3,054.10	0.00
tblEnergyUse	NT24E	3,795.01	0.00
tblEnergyUse	NT24E	6,155.97	0.00
tblEnergyUse	NT24NG	1,599.00	2,301.00
tblEnergyUse	NT24NG	1,599.00	2,028.00
tblEnergyUse	NT24NG	1,599.00	3,029.00
tblEnergyUse	NT24NG	1,599.00	4,576.00
tblEnergyUse	NT24NG	0.00	16.60
tblEnergyUse	NT24NG	0.00	10.40
tblEnergyUse	T24E	165.27	0.00
tblEnergyUse	T24E	176.92	0.00
tblEnergyUse	T24E	204.10	0.00
tblEnergyUse	T24E	191.61	0.00
tblEnergyUse	T24NG	8,768.16	0.00
tblEnergyUse	T24NG	2,182.40	0.00
tblEnergyUse	T24NG	3,351.17	0.00

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

tblEnergyUse	T24NG	9,528.86	0.00
tblFireplaces	NumberGas	1,087.35	0.00
tblFireplaces	NumberGas	53,235.60	0.00
tblFireplaces	NumberGas	293.15	0.00
tblFireplaces	NumberGas	383.90	0.00
tblFireplaces	NumberWood	691.95	0.00
tblFireplaces	NumberWood	33,877.20	0.00
tblFireplaces	NumberWood	186.55	0.00
tblFireplaces	NumberWood	244.30	0.00
tblLandUse	LandUseSquareFeet	0.00	33,174,904.00
tblLandUse	LandUseSquareFeet	0.00	17,710,268.00
tblLandUse	Population	15,793.00	11,320.00
tblLandUse	Population	262,517.00	188,167.00
tblLandUse	Population	3,177.00	2,278.00
tblSolidWaste	SolidWasteGenerationRate	909.42	1,989.00
tblSolidWaste	SolidWasteGenerationRate	44,524.32	33,056.00
tblSolidWaste	SolidWasteGenerationRate	245.18	568.00
tblSolidWaste	SolidWasteGenerationRate	357.75	1,692.00
tblSolidWaste	SolidWasteGenerationRate	0.00	76,044.00
tblSolidWaste	SolidWasteGenerationRate	0.00	14,498.00
tblVehicleTrips	ST_TR	8.14	0.00
tblVehicleTrips	ST_TR	4.91	0.00
tblVehicleTrips	ST_TR	8.14	0.00
tblVehicleTrips	ST_TR	9.54	0.00
tblVehicleTrips	SU_TR	6.28	0.00
tblVehicleTrips	SU_TR	4.09	0.00
tblVehicleTrips	SU_TR	6.28	0.00
tblVehicleTrips	SU_TR	8.55	0.00
tblVehicleTrips	WD_TR	7.32	0.00

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

tblVehicleTrips	WD_TR	5.44	0.00
tblVehicleTrips	WD_TR	7.32	0.00
tblVehicleTrips	WD_TR	9.44	0.00
tblWater	IndoorWaterUseRate	128,809,508.65	0.00
tblWater	IndoorWaterUseRate	6,306,388,447.95	0.00
tblWater	IndoorWaterUseRate	34,727,095.66	0.00
tblWater	IndoorWaterUseRate	45,477,509.88	0.00
tblWater	OutdoorWaterUseRate	81,205,994.59	0.00
tblWater	OutdoorWaterUseRate	3,975,766,630.23	0.00
tblWater	OutdoorWaterUseRate	21,893,169.00	0.00
tblWater	OutdoorWaterUseRate	28,670,604.06	0.00
tblWoodstoves	NumberCatalytic	98.85	0.00
tblWoodstoves	NumberCatalytic	4,839.60	0.00
tblWoodstoves	NumberCatalytic	26.65	0.00
tblWoodstoves	NumberCatalytic	34.90	0.00
tblWoodstoves	NumberNoncatalytic	98.85	0.00
tblWoodstoves	NumberNoncatalytic	4,839.60	0.00
tblWoodstoves	NumberNoncatalytic	26.65	0.00
tblWoodstoves	NumberNoncatalytic	34.90	0.00

2.0 Emissions Summary

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

2.1 Overall Construction

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2023	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Maximum	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2023	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Maximum	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOX (tons/quarter)	Maximum Mitigated ROG + NOX (tons/quarter)

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

		Highest		

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	831.1741	8.5370	739.7142	0.0392		4.1193	4.1193		4.1193	4.1193	0.0000	1,213.7887	1,213.7887	1.1568	0.0000	1,242.7088
Energy	5.0881	45.6414	34.3527	0.2775		3.5154	3.5154		3.5154	3.5154	0.0000	50,354.5220	50,354.5220	0.9651	0.9232	50,653.7537
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Waste						0.0000	0.0000		0.0000	0.0000	25,951.7856	0.0000	25,951.7856	1,533.7066	0.0000	64,294.4504
Water						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**836.2622**	**54.1785**	**774.0669**	**0.3168**	**0.0000**	**7.6347**	**7.6347**	**0.0000**	**7.6347**	**7.6347**	**25,951.7856**	**51,568.3107**	**77,520.0963**	**1,535.8285**	**0.9232**	**116,190.9130**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

2.2 Overall Operational

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	831.1741	8.5370	739.7142	0.0392		4.1193	4.1193		4.1193	4.1193	0.0000	1,213.7887	1,213.7887	1.1568	0.0000	1,242.7088
Energy	5.0881	45.6414	34.3527	0.2775		3.5154	3.5154		3.5154	3.5154	0.0000	50,354.5220	50,354.5220	0.9651	0.9232	50,653.7537
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Waste						0.0000	0.0000		0.0000	0.0000	25,951.7856	0.0000	25,951.7856	1,533.7066	0.0000	64,294.4504
Water						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**836.2622**	**54.1785**	**774.0669**	**0.3168**	**0.0000**	**7.6347**	**7.6347**	**0.0000**	**7.6347**	**7.6347**	**25,951.7856**	**51,568.3107**	**77,520.0963**	**1,535.8285**	**0.9232**	**116,190.9130**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	7/19/2023	7/18/2023	5	0	

Acres of Grading (Site Preparation Phase): 0

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Acres of Grading (Grading Phase): 0

Acres of Paving: 0

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area: 0 (Architectural Coating – sqft)

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Demolition	Excavators	3	8.00	158	0.38
Demolition	Rubber Tired Dozers	2	8.00	247	0.40

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	6	15.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.2 Demolition - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.2 Demolition - 2023

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Apartments Low Rise	0.00	0.00	0.00		
Apartments Mid Rise	0.00	0.00	0.00		
Condo/Townhouse	0.00	0.00	0.00		
Single Family Housing	0.00	0.00	0.00		
User Defined Commercial	0.00	0.00	0.00		
User Defined Industrial	0.00	0.00	0.00		
Total	0.00	0.00	0.00		

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Apartments Low Rise	10.80	7.30	7.50	42.30	19.60	38.10	86	11	3
Apartments Mid Rise	10.80	7.30	7.50	42.30	19.60	38.10	86	11	3
Condo/Townhouse	10.80	7.30	7.50	42.30	19.60	38.10	86	11	3

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Single Family Housing	10.80	7.30	7.50	42.30	19.60	38.10	86	11	3
User Defined Commercial	9.50	7.30	7.30	0.00	0.00	0.00	0	0	0
User Defined Industrial	9.50	7.30	7.30	0.00	0.00	0.00	0	0	0

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Apartments Low Rise	0.534542	0.059637	0.191637	0.128334	0.022737	0.006209	0.003994	0.022357	0.000379	0.000132	0.026770	0.000794	0.002479
Apartments Mid Rise	0.534542	0.059637	0.191637	0.128334	0.022737	0.006209	0.003994	0.022357	0.000379	0.000132	0.026770	0.000794	0.002479
Condo/Townhouse	0.534542	0.059637	0.191637	0.128334	0.022737	0.006209	0.003994	0.022357	0.000379	0.000132	0.026770	0.000794	0.002479
Single Family Housing	0.534542	0.059637	0.191637	0.128334	0.022737	0.006209	0.003994	0.022357	0.000379	0.000132	0.026770	0.000794	0.002479
User Defined Commercial	0.534542	0.059637	0.191637	0.128334	0.022737	0.006209	0.003994	0.022357	0.000379	0.000132	0.026770	0.000794	0.002479
User Defined Industrial	0.534542	0.059637	0.191637	0.128334	0.022737	0.006209	0.003994	0.022357	0.000379	0.000132	0.026770	0.000794	0.002479

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Electricity Mitigated						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
NaturalGas Mitigated	5.0881	45.6414	34.3527	0.2775		3.5154	3.5154		3.5154	3.5154	0.0000	50,354.5220	50,354.5220	0.9651	0.9232	50,653.7537
NaturalGas Unmitigated	5.0881	45.6414	34.3527	0.2775		3.5154	3.5154		3.5154	3.5154	0.0000	50,354.5220	50,354.5220	0.9651	0.9232	50,653.7537

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Apartments Low Rise	1.27061e+007	0.0685	0.5855	0.2491	3.7400e-003		0.0473	0.0473		0.0473	0.0473	0.0000	678.0471	678.0471	0.0130	0.0124	682.0764
Apartments Mid Rise	1.86148e+008	1.0037	8.5774	3.6500	0.0548		0.6935	0.6935		0.6935	0.6935	0.0000	9,933.5711	9,933.5711	0.1904	0.1821	9,992.6013
Condo/Townhouse	4.77976e+006	0.0258	0.2202	0.0937	1.4100e-003		0.0178	0.0178		0.0178	0.0178	0.0000	255.0663	255.0663	4.8900e-003	4.6800e-003	256.5820
Single Family Housing	5.08394e+006	0.0274	0.2343	0.0997	1.5000e-003		0.0189	0.0189		0.0189	0.0189	0.0000	271.2982	271.2982	5.2000e-003	4.9700e-003	272.9104
User Defined Commercial	5.50703e+008	2.9695	26.9953	22.6760	0.1620		2.0516	2.0516		2.0516	2.0516	0.0000	29,387.6310	29,387.6310	0.5633	0.5388	29,562.2670
User Defined Industrial	1.84187e+008	0.9932	9.0288	7.5842	0.0542		0.6862	0.6862		0.6862	0.6862	0.0000	9,828.9084	9,828.9084	0.1884	0.1802	9,887.3167
Total		**5.0881**	**45.6414**	**34.3527**	**0.2775**		**3.5154**	**3.5154**		**3.5154**	**3.5154**	**0.0000**	**50,354.5220**	**50,354.5220**	**0.9651**	**0.9232**	**50,653.7537**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

5.2 Energy by Land Use - NaturalGas

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Apartments Low Rise	1.27061e+007	0.0685	0.5855	0.2491	3.7400e-003		0.0473	0.0473		0.0473	0.0473	0.0000	678.0471	678.0471	0.0130	0.0124	682.0764
Apartments Mid Rise	1.86148e+008	1.0037	8.5774	3.6500	0.0548		0.6935	0.6935		0.6935	0.6935	0.0000	9,933.5711	9,933.5711	0.1904	0.1821	9,992.6013
Condo/Townhouse	4.77976e+006	0.0258	0.2202	0.0937	1.4100e-003		0.0178	0.0178		0.0178	0.0178	0.0000	255.0663	255.0663	4.8900e-003	4.6800e-003	256.5820
Single Family Housing	5.08394e+006	0.0274	0.2343	0.0997	1.5000e-003		0.0189	0.0189		0.0189	0.0189	0.0000	271.2982	271.2982	5.2000e-003	4.9700e-003	272.9104
User Defined Commercial	5.50703e+008	2.9695	26.9953	22.6760	0.1620		2.0516	2.0516		2.0516	2.0516	0.0000	29,387.6310	29,387.6310	0.5633	0.5388	29,562.2670
User Defined Industrial	1.84187e+008	0.9932	9.0288	7.5842	0.0542		0.6862	0.6862		0.6862	0.6862	0.0000	9,828.9084	9,828.9084	0.1884	0.1802	9,887.3167
Total		**5.0881**	**45.6414**	**34.3527**	**0.2775**		**3.5154**	**3.5154**		**3.5154**	**3.5154**	**0.0000**	**50,354.5220**	**50,354.5220**	**0.9651**	**0.9232**	**50,653.7537**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

5.3 Energy by Land Use - Electricity

Unmitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Apartments Low Rise	0	0.0000	0.0000	0.0000	0.0000
Apartments Mid Rise	0	0.0000	0.0000	0.0000	0.0000
Condo/Townhouse	0	0.0000	0.0000	0.0000	0.0000
Single Family Housing	0	0.0000	0.0000	0.0000	0.0000
User Defined Commercial	0	0.0000	0.0000	0.0000	0.0000
User Defined Industrial	0	0.0000	0.0000	0.0000	0.0000
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

5.3 Energy by Land Use - Electricity

Mitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Apartments Low Rise	0	0.0000	0.0000	0.0000	0.0000
Apartments Mid Rise	0	0.0000	0.0000	0.0000	0.0000
Condo/Townhouse	0	0.0000	0.0000	0.0000	0.0000
Single Family Housing	0	0.0000	0.0000	0.0000	0.0000
User Defined Commercial	0	0.0000	0.0000	0.0000	0.0000
User Defined Industrial	0	0.0000	0.0000	0.0000	0.0000
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**

6.0 Area Detail

6.1 Mitigation Measures Area

Seattle Comprehensive Plan - Alt 4 - Siskiyou County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	831.1741	8.5370	739.7142	0.0392		4.1193	4.1193		4.1193	4.1193	0.0000	1,213.7887	1,213.7887	1.1568	0.0000	1,242.7088
Unmitigated	831.1741	8.5370	739.7142	0.0392		4.1193	4.1193		4.1193	4.1193	0.0000	1,213.7887	1,213.7887	1.1568	0.0000	1,242.7088

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	216.2680					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	592.7533					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Hearth	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	22.1529	8.5370	739.7142	0.0392		4.1193	4.1193		4.1193	4.1193	0.0000	1,213.7887	1,213.7887	1.1568	0.0000	1,242.7088
Total	**831.1741**	**8.5370**	**739.7142**	**0.0392**		**4.1193**	**4.1193**		**4.1193**	**4.1193**	**0.0000**	**1,213.7887**	**1,213.7887**	**1.1568**	**0.0000**	**1,242.7088**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	216.2680					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	592.7533					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Hearth	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	22.1529	8.5370	739.7142	0.0392		4.1193	4.1193		4.1193	4.1193	0.0000	1,213.7887	1,213.7887	1.1568	0.0000	1,242.7088
Total	**831.1741**	**8.5370**	**739.7142**	**0.0392**		**4.1193**	**4.1193**		**4.1193**	**4.1193**	**0.0000**	**1,213.7887**	**1,213.7887**	**1.1568**	**0.0000**	**1,242.7088**

7.0 Water Detail

7.1 Mitigation Measures Water

Seattle Comprehensive Plan - Alt 4 - Siskiyou County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	0.0000	0.0000	0.0000	0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

7.2 Water by Land Use

Unmitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Apartments Low Rise	0 / 0	0.0000	0.0000	0.0000	0.0000
Apartments Mid Rise	0 / 0	0.0000	0.0000	0.0000	0.0000
Condo/Townhouse	0 / 0	0.0000	0.0000	0.0000	0.0000
Single Family Housing	0 / 0	0.0000	0.0000	0.0000	0.0000
User Defined Commercial	0 / 0	0.0000	0.0000	0.0000	0.0000
User Defined Industrial	0 / 0	0.0000	0.0000	0.0000	0.0000
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

7.2 Water by Land Use

Mitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Apartments Low Rise	0 / 0	0.0000	0.0000	0.0000	0.0000
Apartments Mid Rise	0 / 0	0.0000	0.0000	0.0000	0.0000
Condo/Townhouse	0 / 0	0.0000	0.0000	0.0000	0.0000
Single Family Housing	0 / 0	0.0000	0.0000	0.0000	0.0000
User Defined Commercial	0 / 0	0.0000	0.0000	0.0000	0.0000
User Defined Industrial	0 / 0	0.0000	0.0000	0.0000	0.0000
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**

8.0 Waste Detail

8.1 Mitigation Measures Waste

Seattle Comprehensive Plan - Alt 4 - Siskiyou County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Category/Year

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	25,951.7856	1,533.7066	0.0000	64,294.4504
Unmitigated	25,951.7856	1,533.7066	0.0000	64,294.4504

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

8.2 Waste by Land Use

Unmitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Apartments Low Rise	1989	403.7490	23.8609	0.0000	1,000.2711
Apartments Mid Rise	33056	6,710.0693	396.5537	0.0000	16,623.9126
Condo/Townhouse	568	115.2989	6.8140	0.0000	285.6481
Single Family Housing	1692	343.4607	20.2980	0.0000	850.9094
User Defined Commercial	76044	15,436.2448	912.2559	0.0000	38,242.6431
User Defined Industrial	14498	2,942.9630	173.9241	0.0000	7,291.0662
Total		**25,951.7856**	**1,533.7066**	**0.0000**	**64,294.4505**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

8.2 Waste by Land Use

Mitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Apartments Low Rise	1989	403.7490	23.8609	0.0000	1,000.2711
Apartments Mid Rise	33056	6,710.0693	396.5537	0.0000	16,623.9126
Condo/Townhouse	568	115.2989	6.8140	0.0000	285.6481
Single Family Housing	1692	343.4607	20.2980	0.0000	850.9094
User Defined Commercial	76044	15,436.2448	912.2559	0.0000	38,242.6431
User Defined Industrial	14498	2,942.9630	173.9241	0.0000	7,291.0662
Total		**25,951.7856**	**1,533.7066**	**0.0000**	**64,294.4505**

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type

Boilers

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Seattle Comprehensive Plan - Alt 5

Siskiyou County, Annual

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
User Defined Commercial	33,174.85	User Defined Unit	0.00	33,174,845.00	0
User Defined Industrial	17,710.25	User Defined Unit	0.00	17,710,246.00	0
Apartments Low Rise	4,056.00	Dwelling Unit	253.50	4,056,000.00	8315
Apartments Mid Rise	113,705.00	Dwelling Unit	2,992.24	113,705,000.00	233095
Condo/Townhouse	1,128.00	Dwelling Unit	70.50	1,128,000.00	2312
Single Family Housing	1,111.00	Dwelling Unit	360.71	1,999,800.00	2278

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.2	**Precipitation Freq (Days)**	85
Climate Zone	14			**Operational Year**	2045
Utility Company	Seattle City Light				
CO2 Intensity (lb/MWhr)	31.35	**CH4 Intensity (lb/MWhr)**	0.029	**N2O Intensity (lb/MWhr)**	0.006

1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Land Use - SF, 2.05 persons per DU

Construction Phase - Ops only

Vehicle Trips - Energy and Solid Waste Only

Woodstoves - Energy and Solid Waste Only

Consumer Products - Energy and Solid Waste Only

Area Coating - Energy and Solid Waste Only

Seattle Comprehensive Plan - Alt 5 - Siskiyou County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Landscape Equipment - Energy and Solid Waste Only

Energy Use - Electricity: SCL Carbon Neutral; NG: SCL, EIA

Water And Wastewater - Energy and Solid Waste Only

Solid Waste - Seattle Public Utilities, City of Seattle 2022 Solid Waste Plan Update: Moving Upstream to Zero Waste (2022-2027), December 2022

Table Name	Column Name	Default Value	New Value
tblConstructionPhase	NumDays	10,000.00	0.00
tblConstructionPhase	PhaseEndDate	11/15/2061	7/18/2023
tblEnergyUse	LightingElect	810.36	0.00
tblEnergyUse	LightingElect	741.44	0.00
tblEnergyUse	LightingElect	1,001.10	0.00
tblEnergyUse	LightingElect	1,608.84	0.00
tblEnergyUse	NT24E	3,172.76	0.00
tblEnergyUse	NT24E	3,054.10	0.00
tblEnergyUse	NT24E	3,795.01	0.00
tblEnergyUse	NT24E	6,155.97	0.00
tblEnergyUse	NT24NG	1,599.00	2,301.00
tblEnergyUse	NT24NG	1,599.00	2,028.00
tblEnergyUse	NT24NG	1,599.00	3,029.00
tblEnergyUse	NT24NG	1,599.00	4,576.00
tblEnergyUse	NT24NG	0.00	16.60
tblEnergyUse	NT24NG	0.00	10.40
tblEnergyUse	T24E	165.27	0.00
tblEnergyUse	T24E	176.92	0.00
tblEnergyUse	T24E	204.10	0.00
tblEnergyUse	T24E	191.61	0.00
tblEnergyUse	T24NG	8,768.16	0.00
tblEnergyUse	T24NG	2,182.40	0.00
tblEnergyUse	T24NG	3,351.17	0.00

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

tblEnergyUse	T24NG	9,528.86	0.00
tblFireplaces	NumberGas	1,087.35	0.00
tblFireplaces	NumberGas	53,235.60	0.00
tblFireplaces	NumberGas	293.15	0.00
tblFireplaces	NumberGas	383.90	0.00
tblFireplaces	NumberWood	691.95	0.00
tblFireplaces	NumberWood	33,877.20	0.00
tblFireplaces	NumberWood	186.55	0.00
tblFireplaces	NumberWood	244.30	0.00
tblLandUse	LandUseSquareFeet	0.00	33,174,845.00
tblLandUse	LandUseSquareFeet	0.00	17,710,246.00
tblLandUse	Population	11,600.00	8,315.00
tblLandUse	Population	325,196.00	233,095.00
tblLandUse	Population	3,226.00	2,312.00
tblLandUse	Population	3,177.00	2,278.00
tblSolidWaste	SolidWasteGenerationRate	909.42	1,461.00
tblSolidWaste	SolidWasteGenerationRate	44,524.32	40,949.00
tblSolidWaste	SolidWasteGenerationRate	245.18	406.00
tblSolidWaste	SolidWasteGenerationRate	357.75	1,692.00
tblSolidWaste	SolidWasteGenerationRate	0.00	76,044.00
tblSolidWaste	SolidWasteGenerationRate	0.00	14,498.00
tblVehicleTrips	ST_TR	8.14	0.00
tblVehicleTrips	ST_TR	4.91	0.00
tblVehicleTrips	ST_TR	8.14	0.00
tblVehicleTrips	ST_TR	9.54	0.00
tblVehicleTrips	SU_TR	6.28	0.00
tblVehicleTrips	SU_TR	4.09	0.00
tblVehicleTrips	SU_TR	6.28	0.00
tblVehicleTrips	SU_TR	8.55	0.00

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

tblVehicleTrips	WD_TR	7.32	0.00
tblVehicleTrips	WD_TR	5.44	0.00
tblVehicleTrips	WD_TR	7.32	0.00
tblVehicleTrips	WD_TR	9.44	0.00
tblWater	IndoorWaterUseRate	128,809,508.65	0.00
tblWater	IndoorWaterUseRate	6,306,388,447.95	0.00
tblWater	IndoorWaterUseRate	34,727,095.66	0.00
tblWater	IndoorWaterUseRate	45,477,509.88	0.00
tblWater	OutdoorWaterUseRate	81,205,994.59	0.00
tblWater	OutdoorWaterUseRate	3,975,766,630.23	0.00
tblWater	OutdoorWaterUseRate	21,893,169.00	0.00
tblWater	OutdoorWaterUseRate	28,670,604.06	0.00
tblWoodstoves	NumberCatalytic	98.85	0.00
tblWoodstoves	NumberCatalytic	4,839.60	0.00
tblWoodstoves	NumberCatalytic	26.65	0.00
tblWoodstoves	NumberCatalytic	34.90	0.00
tblWoodstoves	NumberNoncatalytic	98.85	0.00
tblWoodstoves	NumberNoncatalytic	4,839.60	0.00
tblWoodstoves	NumberNoncatalytic	26.65	0.00
tblWoodstoves	NumberNoncatalytic	34.90	0.00

2.0 Emissions Summary

Seattle Comprehensive Plan - Alt 5 - Siskiyou County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

2.1 Overall Construction

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2023	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Maximum	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2023	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Maximum	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOX (tons/quarter)	Maximum Mitigated ROG + NOX (tons/quarter)

Seattle Comprehensive Plan - Alt 5 - Siskiyou County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

		Highest		

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	913.7058	10.2436	887.5641	0.0471		4.9428	4.9428		4.9428	4.9428	0.0000	1,456.3645	1,456.3645	1.3877	0.0000	1,491.0570
Energy	5.3022	47.4711	35.1313	0.2892		3.6633	3.6633		3.6633	3.6633	0.0000	52,473.4987	52,473.4987	1.0057	0.9620	52,785.3225
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Waste						0.0000	0.0000		0.0000	0.0000	27,413.9295	0.0000	27,413.9295	1,620.1168	0.0000	67,916.8501
Water						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**919.0080**	**57.7147**	**922.6954**	**0.3363**	**0.0000**	**8.6061**	**8.6061**	**0.0000**	**8.6061**	**8.6061**	**27,413.9295**	**53,929.8632**	**81,343.7928**	**1,622.5103**	**0.9620**	**122,193.2296**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

2.2 Overall Operational

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	913.7058	10.2436	887.5641	0.0471		4.9428	4.9428		4.9428	4.9428	0.0000	1,456.3645	1,456.3645	1.3877	0.0000	1,491.0570
Energy	5.3022	47.4711	35.1313	0.2892		3.6633	3.6633		3.6633	3.6633	0.0000	52,473.4987	52,473.4987	1.0057	0.9620	52,785.3225
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Waste						0.0000	0.0000		0.0000	0.0000	27,413.9295	0.0000	27,413.9295	1,620.1168	0.0000	67,916.8501
Water						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**919.0080**	**57.7147**	**922.6954**	**0.3363**	**0.0000**	**8.6061**	**8.6061**	**0.0000**	**8.6061**	**8.6061**	**27,413.9295**	**53,929.8632**	**81,343.7928**	**1,622.5103**	**0.9620**	**122,193.2296**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	7/19/2023	7/18/2023	5	0	

Acres of Grading (Site Preparation Phase): 0

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Acres of Grading (Grading Phase): 0

Acres of Paving: 0

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area: 0 (Architectural Coating – sqft)

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Demolition	Excavators	3	8.00	158	0.38
Demolition	Rubber Tired Dozers	2	8.00	247	0.40

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	6	15.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.2 Demolition - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.2 Demolition - 2023

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

4.0 Operational Detail - Mobile

Seattle Comprehensive Plan - Alt 5 - Siskiyou County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Apartments Low Rise	0.00	0.00	0.00		
Apartments Mid Rise	0.00	0.00	0.00		
Condo/Townhouse	0.00	0.00	0.00		
Single Family Housing	0.00	0.00	0.00		
User Defined Commercial	0.00	0.00	0.00		
User Defined Industrial	0.00	0.00	0.00		
Total	0.00	0.00	0.00		

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Apartments Low Rise	10.80	7.30	7.50	42.30	19.60	38.10	86	11	3
Apartments Mid Rise	10.80	7.30	7.50	42.30	19.60	38.10	86	11	3
Condo/Townhouse	10.80	7.30	7.50	42.30	19.60	38.10	86	11	3

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Single Family Housing	10.80	7.30	7.50	42.30	19.60	38.10	86	11	3
User Defined Commercial	9.50	7.30	7.30	0.00	0.00	0.00	0	0	0
User Defined Industrial	9.50	7.30	7.30	0.00	0.00	0.00	0	0	0

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Apartments Low Rise	0.534542	0.059637	0.191637	0.128334	0.022737	0.006209	0.003994	0.022357	0.000379	0.000132	0.026770	0.000794	0.002479
Apartments Mid Rise	0.534542	0.059637	0.191637	0.128334	0.022737	0.006209	0.003994	0.022357	0.000379	0.000132	0.026770	0.000794	0.002479
Condo/Townhouse	0.534542	0.059637	0.191637	0.128334	0.022737	0.006209	0.003994	0.022357	0.000379	0.000132	0.026770	0.000794	0.002479
Single Family Housing	0.534542	0.059637	0.191637	0.128334	0.022737	0.006209	0.003994	0.022357	0.000379	0.000132	0.026770	0.000794	0.002479
User Defined Commercial	0.534542	0.059637	0.191637	0.128334	0.022737	0.006209	0.003994	0.022357	0.000379	0.000132	0.026770	0.000794	0.002479
User Defined Industrial	0.534542	0.059637	0.191637	0.128334	0.022737	0.006209	0.003994	0.022357	0.000379	0.000132	0.026770	0.000794	0.002479

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Electricity Mitigated						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
NaturalGas Mitigated	5.3022	47.4711	35.1313	0.2892		3.6633	3.6633		3.6633	3.6633	0.0000	52,473.4987	52,473.4987	1.0057	0.9620	52,785.3225
NaturalGas Unmitigated	5.3022	47.4711	35.1313	0.2892		3.6633	3.6633		3.6633	3.6633	0.0000	52,473.4987	52,473.4987	1.0057	0.9620	52,785.3225

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Apartments Low Rise	9.33286e+006	0.0503	0.4300	0.1830	2.7400e-003		0.0348	0.0348		0.0348	0.0348	0.0000	498.0367	498.0367	9.5500e-003	9.1300e-003	500.9963
Apartments Mid Rise	2.30594e+008	1.2434	10.6254	4.5215	0.0678		0.8591	0.8591		0.8591	0.8591	0.0000	12,305.3601	12,305.3601	0.2359	0.2256	12,378.4847
Condo/Townhouse	3.41671e+006	0.0184	0.1574	0.0670	1.0000e-003		0.0127	0.0127		0.0127	0.0127	0.0000	182.3288	182.3288	3.4900e-003	3.3400e-003	183.4123
Single Family Housing	5.08394e+006	0.0274	0.2343	0.0997	1.5000e-003		0.0189	0.0189		0.0189	0.0189	0.0000	271.2982	271.2982	5.2000e-003	4.9700e-003	272.9104
User Defined Commercial	5.50702e+008	2.9695	26.9952	22.6760	0.1620		2.0516	2.0516		2.0516	2.0516	0.0000	29,387.5787	29,387.5787	0.5633	0.5388	29,562.2144
User Defined Industrial	1.84187e+008	0.9932	9.0288	7.5842	0.0542		0.6862	0.6862		0.6862	0.6862	0.0000	9,828.8962	9,828.8962	0.1884	0.1802	9,887.3044
Total		**5.3022**	**47.4711**	**35.1313**	**0.2892**		**3.6633**	**3.6633**		**3.6633**	**3.6633**	**0.0000**	**52,473.4987**	**52,473.4987**	**1.0057**	**0.9620**	**52,785.3225**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

5.2 Energy by Land Use - NaturalGas

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Apartments Low Rise	9.33286e+006	0.0503	0.4300	0.1830	2.7400e-003		0.0348	0.0348		0.0348	0.0348	0.0000	498.0367	498.0367	9.5500e-003	9.1300e-003	500.9963
Apartments Mid Rise	2.30594e+008	1.2434	10.6254	4.5215	0.0678		0.8591	0.8591		0.8591	0.8591	0.0000	12,305.3601	12,305.3601	0.2359	0.2256	12,378.4847
Condo/Townhouse	3.41671e+006	0.0184	0.1574	0.0670	1.0000e-003		0.0127	0.0127		0.0127	0.0127	0.0000	182.3288	182.3288	3.4900e-003	3.3400e-003	183.4123
Single Family Housing	5.08394e+006	0.0274	0.2343	0.0997	1.5000e-003		0.0189	0.0189		0.0189	0.0189	0.0000	271.2982	271.2982	5.2000e-003	4.9700e-003	272.9104
User Defined Commercial	5.50702e+008	2.9695	26.9952	22.6760	0.1620		2.0516	2.0516		2.0516	2.0516	0.0000	29,387.5787	29,387.5787	0.5633	0.5388	29,562.2144
User Defined Industrial	1.84187e+008	0.9932	9.0288	7.5842	0.0542		0.6862	0.6862		0.6862	0.6862	0.0000	9,828.8962	9,828.8962	0.1884	0.1802	9,887.3044
Total		**5.3022**	**47.4711**	**35.1313**	**0.2892**		**3.6633**	**3.6633**		**3.6633**	**3.6633**	**0.0000**	**52,473.4987**	**52,473.4987**	**1.0057**	**0.9620**	**52,785.3225**

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

5.3 Energy by Land Use - Electricity

Unmitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Apartments Low Rise	0	0.0000	0.0000	0.0000	0.0000
Apartments Mid Rise	0	0.0000	0.0000	0.0000	0.0000
Condo/Townhouse	0	0.0000	0.0000	0.0000	0.0000
Single Family Housing	0	0.0000	0.0000	0.0000	0.0000
User Defined Commercial	0	0.0000	0.0000	0.0000	0.0000
User Defined Industrial	0	0.0000	0.0000	0.0000	0.0000
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

5.3 Energy by Land Use - Electricity

Mitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Apartments Low Rise	0	0.0000	0.0000	0.0000	0.0000
Apartments Mid Rise	0	0.0000	0.0000	0.0000	0.0000
Condo/Townhouse	0	0.0000	0.0000	0.0000	0.0000
Single Family Housing	0	0.0000	0.0000	0.0000	0.0000
User Defined Commercial	0	0.0000	0.0000	0.0000	0.0000
User Defined Industrial	0	0.0000	0.0000	0.0000	0.0000
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**

6.0 Area Detail

6.1 Mitigation Measures Area

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	913.7058	10.2436	887.5641	0.0471		4.9428	4.9428		4.9428	4.9428	0.0000	1,456.3645	1,456.3645	1.3877	0.0000	1,491.0570
Unmitigated	913.7058	10.2436	887.5641	0.0471		4.9428	4.9428		4.9428	4.9428	0.0000	1,456.3645	1,456.3645	1.3877	0.0000	1,491.0570

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	216.2680					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	670.8629					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Hearth	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	26.5749	10.2436	887.5641	0.0471		4.9428	4.9428		4.9428	4.9428	0.0000	1,456.3645	1,456.3645	1.3877	0.0000	1,491.0570
Total	**913.7058**	**10.2436**	**887.5641**	**0.0471**		**4.9428**	**4.9428**		**4.9428**	**4.9428**	**0.0000**	**1,456.3645**	**1,456.3645**	**1.3877**	**0.0000**	**1,491.0570**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	216.2680					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	670.8629					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Hearth	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	26.5749	10.2436	887.5641	0.0471		4.9428	4.9428		4.9428	4.9428	0.0000	1,456.3645	1,456.3645	1.3877	0.0000	1,491.0570
Total	**913.7058**	**10.2436**	**887.5641**	**0.0471**		**4.9428**	**4.9428**		**4.9428**	**4.9428**	**0.0000**	**1,456.3645**	**1,456.3645**	**1.3877**	**0.0000**	**1,491.0570**

7.0 Water Detail

7.1 Mitigation Measures Water

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	0.0000	0.0000	0.0000	0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

7.2 Water by Land Use

Unmitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Apartments Low Rise	0 / 0	0.0000	0.0000	0.0000	0.0000
Apartments Mid Rise	0 / 0	0.0000	0.0000	0.0000	0.0000
Condo/Townhouse	0 / 0	0.0000	0.0000	0.0000	0.0000
Single Family Housing	0 / 0	0.0000	0.0000	0.0000	0.0000
User Defined Commercial	0 / 0	0.0000	0.0000	0.0000	0.0000
User Defined Industrial	0 / 0	0.0000	0.0000	0.0000	0.0000
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

7.2 Water by Land Use

Mitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Apartments Low Rise	0 / 0	0.0000	0.0000	0.0000	0.0000
Apartments Mid Rise	0 / 0	0.0000	0.0000	0.0000	0.0000
Condo/Townhouse	0 / 0	0.0000	0.0000	0.0000	0.0000
Single Family Housing	0 / 0	0.0000	0.0000	0.0000	0.0000
User Defined Commercial	0 / 0	0.0000	0.0000	0.0000	0.0000
User Defined Industrial	0 / 0	0.0000	0.0000	0.0000	0.0000
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**

8.0 Waste Detail

8.1 Mitigation Measures Waste

Seattle Comprehensive Plan - Alt 5 - Siskiyou County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Category/Year

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	27,413.9295	1,620.1168	0.0000	67,916.8501
Unmitigated	27,413.9295	1,620.1168	0.0000	67,916.8501

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

8.2 Waste by Land Use

Unmitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Apartments Low Rise	1461	296.5698	17.5268	0.0000	734.7391
Apartments Mid Rise	40949	8,312.2769	491.2415	0.0000	20,593.3143
Condo/Townhouse	406	82.4143	4.8706	0.0000	204.1780
Single Family Housing	1692	343.4607	20.2980	0.0000	850.9094
User Defined Commercial	76044	15,436.2448	912.2559	0.0000	38,242.6431
User Defined Industrial	14498	2,942.9630	173.9241	0.0000	7,291.0662
Total		**27,413.9295**	**1,620.1168**	**0.0000**	**67,916.8501**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

8.2 Waste by Land Use

Mitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Apartments Low Rise	1461	296.5698	17.5268	0.0000	734.7391
Apartments Mid Rise	40949	8,312.2769	491.2415	0.0000	20,593.3143
Condo/Townhouse	406	82.4143	4.8706	0.0000	204.1780
Single Family Housing	1692	343.4607	20.2980	0.0000	850.9094
User Defined Commercial	76044	15,436.2448	912.2559	0.0000	38,242.6431
User Defined Industrial	14498	2,942.9630	173.9241	0.0000	7,291.0662
Total		**27,413.9295**	**1,620.1168**	**0.0000**	**67,916.8501**

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type

Boilers

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Seattle Comprehensive Plan - Preferred Alt

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1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
User Defined Commercial	33,174.85	User Defined Unit	0.00	33,174,845.00	0
User Defined Industrial	17,710.25	User Defined Unit	0.00	17,710,246.00	0
Apartments Low Rise	6,675.00	Dwelling Unit	417.19	6,675,000.00	13684
Apartments Mid Rise	94,427.00	Dwelling Unit	2,484.92	94,427,000.00	193575
Condo/Townhouse	14,766.00	Dwelling Unit	922.88	14,766,000.00	30270
Single Family Housing	4,132.00	Dwelling Unit	1,341.56	7,437,600.00	8471

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.2	**Precipitation Freq (Days)**	85
Climate Zone	14			**Operational Year**	2045
Utility Company	Seattle City Light				
CO2 Intensity (lb/MWhr)	31.35	**CH4 Intensity (lb/MWhr)**	0.029	**N2O Intensity (lb/MWhr)**	0.006

1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Land Use - SF, 2.05 persons per DU

Construction Phase - Ops only

Vehicle Trips - Energy and Solid Waste Only

Woodstoves - Energy and Solid Waste Only

Consumer Products - Energy and Solid Waste Only

Area Coating - Energy and Solid Waste Only

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Landscape Equipment - Energy and Solid Waste Only

Energy Use - Electricity: SCL Carbon Neutral; NG: SCL, EIA

Water And Wastewater - Energy and Solid Waste Only

Solid Waste - Seattle Public Utilities, City of Seattle 2022 Solid Waste Plan Update: Moving Upstream to Zero Waste (2022-2027), December 2022

Area Mitigation - Energy and Solid Waste Only

Table Name	Column Name	Default Value	New Value
tblAreaCoating	Area_EF_Nonresidential_Exterior	250	0
tblAreaCoating	Area_EF_Nonresidential_Interior	250	0
tblAreaCoating	Area_EF_Parking	250	0
tblAreaCoating	Area_EF_Residential_Exterior	250	0
tblAreaCoating	Area_EF_Residential_Interior	250	0
tblAreaCoating	Area_Nonresidential_Exterior	25442500	0
tblAreaCoating	Area_Nonresidential_Interior	76327500	0
tblAreaCoating	Area_Residential_Exterior	83231280	0
tblAreaCoating	Area_Residential_Interior	249693840	0
tblAreaCoating	ReapplicationRatePercent	10	0
tblConstructionPhase	NumDays	10,000.00	0.00
tblConstructionPhase	PhaseEndDate	11/15/2061	7/18/2023
tblConsumerProducts	ROG_EF	2.14E-05	0
tblConsumerProducts	ROG_EF_Degreaser	3.542E-07	0
tblConsumerProducts	ROG_EF_PesticidesFertilizers	5.152E-08	0
tblEnergyUse	LightingElect	810.36	0.00
tblEnergyUse	LightingElect	741.44	0.00
tblEnergyUse	LightingElect	1,001.10	0.00
tblEnergyUse	LightingElect	1,608.84	0.00
tblEnergyUse	NT24E	3,172.76	0.00
tblEnergyUse	NT24E	3,054.10	0.00
tblEnergyUse	NT24E	3,795.01	0.00

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

tblEnergyUse	NT24E	6,155.97	0.00
tblEnergyUse	NT24NG	1,599.00	2,301.00
tblEnergyUse	NT24NG	1,599.00	2,028.00
tblEnergyUse	NT24NG	1,599.00	3,029.00
tblEnergyUse	NT24NG	1,599.00	4,576.00
tblEnergyUse	NT24NG	0.00	16.60
tblEnergyUse	NT24NG	0.00	10.40
tblEnergyUse	T24E	165.27	0.00
tblEnergyUse	T24E	176.92	0.00
tblEnergyUse	T24E	204.10	0.00
tblEnergyUse	T24E	191.61	0.00
tblEnergyUse	T24NG	8,768.16	0.00
tblEnergyUse	T24NG	2,182.40	0.00
tblEnergyUse	T24NG	3,351.17	0.00
tblEnergyUse	T24NG	9,528.86	0.00
tblFireplaces	NumberGas	3,671.25	0.00
tblFireplaces	NumberGas	51,934.85	0.00
tblFireplaces	NumberGas	8,121.30	0.00
tblFireplaces	NumberGas	2,272.60	0.00
tblFireplaces	NumberWood	2,336.25	0.00
tblFireplaces	NumberWood	33,049.45	0.00
tblFireplaces	NumberWood	5,168.10	0.00
tblFireplaces	NumberWood	1,446.20	0.00
tblLandUse	LandUseSquareFeet	0.00	33,174,845.00
tblLandUse	LandUseSquareFeet	0.00	17,710,246.00
tblLandUse	Population	19,091.00	13,684.00
tblLandUse	Population	270,061.00	193,575.00
tblLandUse	Population	42,231.00	30,270.00
tblLandUse	Population	11,818.00	8,471.00

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

tblSolidWaste	SolidWasteGenerationRate	3,070.50	2,404.00
tblSolidWaste	SolidWasteGenerationRate	43,436.42	34,006.00
tblSolidWaste	SolidWasteGenerationRate	6,792.36	5,318.00
tblSolidWaste	SolidWasteGenerationRate	2,117.75	6,292.00
tblSolidWaste	SolidWasteGenerationRate	0.00	76,044.00
tblSolidWaste	SolidWasteGenerationRate	0.00	14,498.00
tblVehicleTrips	ST_TR	8.14	0.00
tblVehicleTrips	ST_TR	4.91	0.00
tblVehicleTrips	ST_TR	8.14	0.00
tblVehicleTrips	ST_TR	9.54	0.00
tblVehicleTrips	SU_TR	6.28	0.00
tblVehicleTrips	SU_TR	4.09	0.00
tblVehicleTrips	SU_TR	6.28	0.00
tblVehicleTrips	SU_TR	8.55	0.00
tblVehicleTrips	WD_TR	7.32	0.00
tblVehicleTrips	WD_TR	5.44	0.00
tblVehicleTrips	WD_TR	7.32	0.00
tblVehicleTrips	WD_TR	9.44	0.00
tblWater	IndoorWaterUseRate	434,903,121.02	0.00
tblWater	IndoorWaterUseRate	6,152,299,177.35	0.00
tblWater	IndoorWaterUseRate	962,064,342.33	0.00
tblWater	IndoorWaterUseRate	269,216,433.87	0.00
tblWater	OutdoorWaterUseRate	274,178,054.56	0.00
tblWater	OutdoorWaterUseRate	3,878,623,394.42	0.00
tblWater	OutdoorWaterUseRate	606,518,824.51	0.00
tblWater	OutdoorWaterUseRate	169,723,403.96	0.00
tblWoodstoves	NumberCatalytic	333.75	0.00
tblWoodstoves	NumberCatalytic	4,721.35	0.00
tblWoodstoves	NumberCatalytic	738.30	0.00

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

tblWoodstoves	NumberCatalytic	206.60	0.00
tblWoodstoves	NumberNoncatalytic	333.75	0.00
tblWoodstoves	NumberNoncatalytic	4,721.35	0.00
tblWoodstoves	NumberNoncatalytic	738.30	0.00
tblWoodstoves	NumberNoncatalytic	206.60	0.00

2.0 Emissions Summary

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

2.1 Overall Construction

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2023	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Maximum	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2023	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Maximum	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOX (tons/quarter)	Maximum Mitigated ROG + NOX (tons/quarter)

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

		Highest		

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	26.5749	10.2436	887.5641	0.0471		4.9428	4.9428		4.9428	4.9428	0.0000	1,456.3645	1,456.3645	1.3877	0.0000	1,491.0570
Energy	5.4212	48.4878	35.5639	0.2957		3.7455	3.7455		3.7455	3.7455	0.0000	53,650.9249	53,650.9249	1.0283	0.9836	53,969.7455
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Waste						0.0000	0.0000		0.0000	0.0000	28,126.8338	0.0000	28,126.8338	1,662.2483	0.0000	69,683.0402
Water						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**31.9961**	**58.7314**	**923.1280**	**0.3428**	**0.0000**	**8.6883**	**8.6883**	**0.0000**	**8.6883**	**8.6883**	**28,126.8338**	**55,107.2894**	**83,234.1232**	**1,664.6643**	**0.9836**	**125,143.8427**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

2.2 Overall Operational

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	26.5749	10.2436	887.5641	0.0471		4.9428	4.9428		4.9428	4.9428	0.0000	1,456.3645	1,456.3645	1.3877	0.0000	1,491.0570
Energy	5.4212	48.4878	35.5639	0.2957		3.7455	3.7455		3.7455	3.7455	0.0000	53,650.9249	53,650.9249	1.0283	0.9836	53,969.7455
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Waste						0.0000	0.0000		0.0000	0.0000	28,126.8338	0.0000	28,126.8338	1,662.2483	0.0000	69,683.0402
Water						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**31.9961**	**58.7314**	**923.1280**	**0.3428**	**0.0000**	**8.6883**	**8.6883**	**0.0000**	**8.6883**	**8.6883**	**28,126.8338**	**55,107.2894**	**83,234.1232**	**1,664.6643**	**0.9836**	**125,143.8427**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	7/19/2023	7/18/2023	5	0	

Acres of Grading (Site Preparation Phase): 0

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Acres of Grading (Grading Phase): 0

Acres of Paving: 0

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area: 0 (Architectural Coating – sqft)

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Demolition	Excavators	3	8.00	158	0.38
Demolition	Rubber Tired Dozers	2	8.00	247	0.40

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	6	15.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.2 Demolition - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.2 Demolition - 2023

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

4.0 Operational Detail - Mobile

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Apartments Low Rise	0.00	0.00	0.00		
Apartments Mid Rise	0.00	0.00	0.00		
Condo/Townhouse	0.00	0.00	0.00		
Single Family Housing	0.00	0.00	0.00		
User Defined Commercial	0.00	0.00	0.00		
User Defined Industrial	0.00	0.00	0.00		
Total	0.00	0.00	0.00		

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Apartments Low Rise	10.80	7.30	7.50	42.30	19.60	38.10	86	11	3
Apartments Mid Rise	10.80	7.30	7.50	42.30	19.60	38.10	86	11	3
Condo/Townhouse	10.80	7.30	7.50	42.30	19.60	38.10	86	11	3

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Single Family Housing	10.80	7.30	7.50	42.30	19.60	38.10	86	11	3
User Defined Commercial	9.50	7.30	7.30	0.00	0.00	0.00	0	0	0
User Defined Industrial	9.50	7.30	7.30	0.00	0.00	0.00	0	0	0

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Apartments Low Rise	0.534542	0.059637	0.191637	0.128334	0.022737	0.006209	0.003994	0.022357	0.000379	0.000132	0.026770	0.000794	0.002479
Apartments Mid Rise	0.534542	0.059637	0.191637	0.128334	0.022737	0.006209	0.003994	0.022357	0.000379	0.000132	0.026770	0.000794	0.002479
Condo/Townhouse	0.534542	0.059637	0.191637	0.128334	0.022737	0.006209	0.003994	0.022357	0.000379	0.000132	0.026770	0.000794	0.002479
Single Family Housing	0.534542	0.059637	0.191637	0.128334	0.022737	0.006209	0.003994	0.022357	0.000379	0.000132	0.026770	0.000794	0.002479
User Defined Commercial	0.534542	0.059637	0.191637	0.128334	0.022737	0.006209	0.003994	0.022357	0.000379	0.000132	0.026770	0.000794	0.002479
User Defined Industrial	0.534542	0.059637	0.191637	0.128334	0.022737	0.006209	0.003994	0.022357	0.000379	0.000132	0.026770	0.000794	0.002479

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Electricity Mitigated						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
NaturalGas Mitigated	5.4212	48.4878	35.5639	0.2957		3.7455	3.7455		3.7455	3.7455	0.0000	53,650.9249	53,650.9249	1.0283	0.9836	53,969.7455
NaturalGas Unmitigated	5.4212	48.4878	35.5639	0.2957		3.7455	3.7455		3.7455	3.7455	0.0000	53,650.9249	53,650.9249	1.0283	0.9836	53,969.7455

Seattle Comprehensive Plan - Preferred Alt - Siskiyou County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Apartments Low Rise	1.53592e+007	0.0828	0.7077	0.3012	4.5200e-003		0.0572	0.0572		0.0572	0.0572	0.0000	819.6241	819.6241	0.0157	0.0150	824.4947
Apartments Mid Rise	1.91498e+008	1.0326	8.8239	3.7549	0.0563		0.7134	0.7134		0.7134	0.7134	0.0000	10,219.0602	10,219.0602	0.1959	0.1874	10,279.7870
Condo/Townhouse	4.47262e+007	0.2412	2.0609	0.8770	0.0132		0.1666	0.1666		0.1666	0.1666	0.0000	2,386.7611	2,386.7611	0.0458	0.0438	2,400.9444
Single Family Housing	1.8908e+007	0.1020	0.8713	0.3708	5.5600e-003		0.0704	0.0704		0.0704	0.0704	0.0000	1,009.0046	1,009.0046	0.0193	0.0185	1,015.0006
User Defined Commercial	5.50702e+008	2.9695	26.9952	22.6760	0.1620		2.0516	2.0516		2.0516	2.0516	0.0000	29,387.5787	29,387.5787	0.5633	0.5388	29,562.2144
User Defined Industrial	1.84187e+008	0.9932	9.0288	7.5842	0.0542		0.6862	0.6862		0.6862	0.6862	0.0000	9,828.8962	9,828.8962	0.1884	0.1802	9,887.3044
Total		**5.4212**	**48.4878**	**35.5639**	**0.2957**		**3.7455**	**3.7455**		**3.7455**	**3.7455**	**0.0000**	**53,650.9249**	**53,650.9249**	**1.0283**	**0.9836**	**53,969.7455**

Seattle Comprehensive Plan - Preferred Alt - Siskiyou County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

5.2 Energy by Land Use - NaturalGas

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Apartments Low Rise	1.53592e+007	0.0828	0.7077	0.3012	4.5200e-003		0.0572	0.0572		0.0572	0.0572	0.0000	819.6241	819.6241	0.0157	0.0150	824.4947
Apartments Mid Rise	1.91498e+008	1.0326	8.8239	3.7549	0.0563		0.7134	0.7134		0.7134	0.7134	0.0000	10,219.0602	10,219.0602	0.1959	0.1874	10,279.7870
Condo/Townhouse	4.47262e+007	0.2412	2.0609	0.8770	0.0132		0.1666	0.1666		0.1666	0.1666	0.0000	2,386.7611	2,386.7611	0.0458	0.0438	2,400.9444
Single Family Housing	1.8908e+007	0.1020	0.8713	0.3708	5.5600e-003		0.0704	0.0704		0.0704	0.0704	0.0000	1,009.0046	1,009.0046	0.0193	0.0185	1,015.0006
User Defined Commercial	5.50702e+008	2.9695	26.9952	22.6760	0.1620		2.0516	2.0516		2.0516	2.0516	0.0000	29,387.5787	29,387.5787	0.5633	0.5388	29,562.2144
User Defined Industrial	1.84187e+008	0.9932	9.0288	7.5842	0.0542		0.6862	0.6862		0.6862	0.6862	0.0000	9,828.8962	9,828.8962	0.1884	0.1802	9,887.3044
Total		**5.4212**	**48.4878**	**35.5639**	**0.2957**		**3.7455**	**3.7455**		**3.7455**	**3.7455**	**0.0000**	**53,650.9249**	**53,650.9249**	**1.0283**	**0.9836**	**53,969.7455**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

5.3 Energy by Land Use - Electricity

Unmitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Apartments Low Rise	0	0.0000	0.0000	0.0000	0.0000
Apartments Mid Rise	0	0.0000	0.0000	0.0000	0.0000
Condo/Townhouse	0	0.0000	0.0000	0.0000	0.0000
Single Family Housing	0	0.0000	0.0000	0.0000	0.0000
User Defined Commercial	0	0.0000	0.0000	0.0000	0.0000
User Defined Industrial	0	0.0000	0.0000	0.0000	0.0000
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

5.3 Energy by Land Use - Electricity

Mitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Apartments Low Rise	0	0.0000	0.0000	0.0000	0.0000
Apartments Mid Rise	0	0.0000	0.0000	0.0000	0.0000
Condo/Townhouse	0	0.0000	0.0000	0.0000	0.0000
Single Family Housing	0	0.0000	0.0000	0.0000	0.0000
User Defined Commercial	0	0.0000	0.0000	0.0000	0.0000
User Defined Industrial	0	0.0000	0.0000	0.0000	0.0000
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**

6.0 Area Detail

6.1 Mitigation Measures Area

Seattle Comprehensive Plan - Preferred Alt - Siskiyou County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	26.5749	10.2436	887.5641	0.0471		4.9428	4.9428		4.9428	4.9428	0.0000	1,456.3645	1,456.3645	1.3877	0.0000	1,491.0570
Unmitigated	26.5749	10.2436	887.5641	0.0471		4.9428	4.9428		4.9428	4.9428	0.0000	1,456.3645	1,456.3645	1.3877	0.0000	1,491.0570

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Hearth	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	26.5749	10.2436	887.5641	0.0471		4.9428	4.9428		4.9428	4.9428	0.0000	1,456.3645	1,456.3645	1.3877	0.0000	1,491.0570
Total	**26.5749**	**10.2436**	**887.5641**	**0.0471**		**4.9428**	**4.9428**		**4.9428**	**4.9428**	**0.0000**	**1,456.3645**	**1,456.3645**	**1.3877**	**0.0000**	**1,491.0570**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Hearth	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	26.5749	10.2436	887.5641	0.0471		4.9428	4.9428		4.9428	4.9428	0.0000	1,456.3645	1,456.3645	1.3877	0.0000	1,491.0570
Total	**26.5749**	**10.2436**	**887.5641**	**0.0471**		**4.9428**	**4.9428**		**4.9428**	**4.9428**	**0.0000**	**1,456.3645**	**1,456.3645**	**1.3877**	**0.0000**	**1,491.0570**

7.0 Water Detail

7.1 Mitigation Measures Water

Seattle Comprehensive Plan - Preferred Alt - Siskiyou County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	0.0000	0.0000	0.0000	0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

7.2 Water by Land Use

Unmitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Apartments Low Rise	0 / 0	0.0000	0.0000	0.0000	0.0000
Apartments Mid Rise	0 / 0	0.0000	0.0000	0.0000	0.0000
Condo/Townhouse	0 / 0	0.0000	0.0000	0.0000	0.0000
Single Family Housing	0 / 0	0.0000	0.0000	0.0000	0.0000
User Defined Commercial	0 / 0	0.0000	0.0000	0.0000	0.0000
User Defined Industrial	0 / 0	0.0000	0.0000	0.0000	0.0000
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**

7.2 Water by Land Use

Mitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Apartments Low Rise	0 / 0	0.0000	0.0000	0.0000	0.0000
Apartments Mid Rise	0 / 0	0.0000	0.0000	0.0000	0.0000
Condo/Townhouse	0 / 0	0.0000	0.0000	0.0000	0.0000
Single Family Housing	0 / 0	0.0000	0.0000	0.0000	0.0000
User Defined Commercial	0 / 0	0.0000	0.0000	0.0000	0.0000
User Defined Industrial	0 / 0	0.0000	0.0000	0.0000	0.0000
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**

8.0 Waste Detail

8.1 Mitigation Measures Waste

Seattle Comprehensive Plan - Preferred Alt - Siskiyou County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Category/Year

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	28,126.8338	1,662.2483	0.0000	69,683.0402
Unmitigated	28,126.8338	1,662.2483	0.0000	69,683.0402

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

8.2 Waste by Land Use

Unmitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Apartments Low Rise	2404	487.9903	28.8394	0.0000	1,208.9753
Apartments Mid Rise	34006	6,902.9107	407.9503	0.0000	17,101.6690
Condo/Townhouse	5318	1,079.5059	63.7970	0.0000	2,674.4303
Single Family Housing	6292	1,277.2191	75.4815	0.0000	3,164.2564
User Defined Commercial	76044	15,436.2448	912.2559	0.0000	38,242.6431
User Defined Industrial	14498	2,942.9630	173.9241	0.0000	7,291.0662
Total		**28,126.8338**	**1,662.2483**	**0.0000**	**69,683.0402**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

8.2 Waste by Land Use

Mitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Apartments Low Rise	2404	487.9903	28.8394	0.0000	1,208.9753
Apartments Mid Rise	34006	6,902.9107	407.9503	0.0000	17,101.6690
Condo/Townhouse	5318	1,079.5059	63.7970	0.0000	2,674.4303
Single Family Housing	6292	1,277.2191	75.4815	0.0000	3,164.2564
User Defined Commercial	76044	15,436.2448	912.2559	0.0000	38,242.6431
User Defined Industrial	14498	2,942.9630	173.9241	0.0000	7,291.0662
Total		**28,126.8338**	**1,662.2483**	**0.0000**	**69,683.0402**

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type

Boilers

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

E Energy Appendix

Seattle Comprehensive Plan
On-Road Transportation Fuel

Existing

	Cars	*Trucks*	*Buses*	*Million BTU*	*trillion Btu*
Gasoline	345,397	1,562	125	347,084	0.3471
Diesel	8,074	5,323	752	14,149	0.0141
CNG	-	63	53	116	0.0001
Ethanol (E-85)	621	-	-	621	0.0006
Total Fuel Use				361,969	
Trillion BTU/Capita				0.45	

Washington State Fuel Usage in 2020

	Trillion Btu
gasoline	258.20
Diesel	150.00
NG	0.01
ethanol	20.30

* US EIA, 2020

Alternative 1

	Cars	*Trucks*	*Buses*	*Million BTU*	*trillion Btu*	*% of state*
Gasoline	336,191	1,774	127	338,092	0.3381	0.131%
Diesel	13,508	5,938	783	20,230	0.0202	0.013%
CNG	-	111	50	161	0.0002	1.606%
Ethanol (E-85)	631	-	-	631	0.0006	0.003%
				359,113		
				2.19		

Alternative 2

	Cars	*Trucks*	*Buses*	*Million BTU*	*trillion Btu*	*% of state*
Gasoline	345,844	1,791	127	347,762	0.3478	0.135%
Diesel	13,895	5,993	784	20,672	0.0207	0.014%
CNG	-	112	50	162	0.0002	1.617%
Ethanol (E-85)	649	-	-	649	0.0006	0.003%
				369,245		
				1.80		

Alternative 3

	Cars	*Trucks*	*Buses*	*Million BTU*	*trillion Btu*	*% of state*
Gasoline	345,809	1,796	127	347,732	0.3477	0.135%
Diesel	13,893	6,016	784	20,692	0.0207	0.014%
CNG	-	113	50	162	0.0002	1.622%
Ethanol (E-85)	649	-	-	649	0.0006	0.003%
				369,235		
				1.80		

Alternative 5

	Cars	*Trucks*	*Buses*	*Million BTU*	*trillion Btu*	*% of state*
Gasoline	357,628	1,812	127	359,567	0.3596	0.139%
Diesel	14,368	6,067	784	21,219	0.0212	0.014%
CNG	-	113	50	163	0.0002	1.631%
Ethanol (E-85)	671	-	-	671	0.0007	0.003%

Preferred Alternative

	Cars	*Trucks*	*Buses*	*Million BTU*	*trillion Btu*	*% of state*
Gasoline	358,972	1,819	127	360,919	0.3609	0.140%
Diesel	14,422	6,090	787	21,298	0.0213	0.014%
CNG	-	114	50	164	0.0002	1.637%
Ethanol (E-85)	673	-	-	673	0.0007	0.003%
				383,054		
				1.56		

* Fuel use based on MOVES model outputs.
VMT for Alternative 4 not provided. Growth and VMT assumptions consistent with Alternative 2 and 3

Net increase in fuel consumption compared to Existing

	Alt 1	**Alt 2**	**Alt 3**	**Alt 4**	**Alt 5**	**Preferred**
Gasoline	-0.0090	0.0007	0.0006	0.0007	0.0125	0.0138
Diesel	0.0061	0.0065	0.0065	0.0065	0.0071	0.0071
CNG	0.00004	0.00005	0.00005	0.00005	0.00005	0.00005
Ethanol (E-85)	-0.0013	-0.0013	-0.0013	-0.0013	-0.0013	-0.0013

	Alt 1	**Alt 2**	**Alt 3**	**Alt 4**	**Alt 5**	**Preferred**
Gasoline	-0.003%	0.000%	0.000%	0.000%	0.0048%	0.0054%
Diesel	0.004%	0.004%	0.004%	0.004%	0.0047%	0.0048%
CNG	0.448%	0.459%	0.464%	0.459%	0.4734%	0.4795%
Ethanol (E-85)	-0.006%	-0.006%	-0.006%	-0.006%	-0.0064%	-0.0064%

Seattle Comprehensive Plan
Electricity Consumption

2022 State of Washington

Electricity	310	trillion btu
Natural Gas	351	trillion btu

RESIDENTIAL

	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5	Preferred
Target Housing Growth (dwelling units)						
Single Family	1,389	698	1,111	1,111	1,111	4,132
Townhome	648	533	4,260	1,578	1,128	14,766
Multi-family Low Rise	2,593	1,977	14,247	5,522	4,056	6,675
Multi-family Mid Rise	75,370	96,792	80,382	91,789	113,705	94,427
Million Btu	1,285,659	1,581,937	1,644,496	1,605,522	1,910,979	2,080,703
Trillion Btu	1.29	1.58	1.64	1.61	1.91	2.08
percent of state	0.41%	0.51%	0.53%	0.52%	0.62%	0.67%

Station Area

	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5	Preferred
units	840	2,208			2,703	2,703
million btu	14,868	39,082			42,167	42,167
trillion btu	0.01	0.04			0.04	0.04
percent of state	0.0048%	0.0126%			0.0136%	0.0136%

COMMERCIAL

	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5	Preferred*
Target Commercial Growth(SF)	33,174,904	33,174,904	33,174,904	33,174,904	33,174,845	33,174,845
Estimated Electricity Demand (kBtu)	1,562,537,978	1,562,537,978	1,562,537,978	1,562,537,978	1,562,535,200	1,562,535,200
Million Btu	1,562,538	1,562,538	1,562,538	1,562,538	1,562,535	1,562,535
Trillion Btu	1.56	1.56	1.56	1.56	1.56	1.56
percent of state	0.50%	0.50%	0.50%	0.50%	0.50%	0.50%

Station Area

	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5	Preferred*
SF	178,948	244,963			251,033	164,500
Estimated Electricity Demand (kBtu)	8,428,451	11,537,757			11,823,654	7,747,950
million btu	8,428	11,538			11,824	7,748
trillion btu	0.008	0.012			0.012	0.008
percent of state	0.0027%	0.0037%			0.0038%	0.0025%

INDUSTRIAL

	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5	Preferred*
Target Industrial Growth(SF)	17,710,268	17,710,268	17,710,268	17,710,268	17,710,246	17,710,246
Estimated Electricity Demand (kBtu)	368,373,574	368,373,574	368,373,574	368,373,574	368,373,117	368,373,117
Million Btu	368,374	368,374	368,374	368,374	368,373	368,373
Trillion Btu	0.37	0.37	0.37	0.37	0.37	0.37
percent of state	0.12%	0.12%	0.12%	0.12%	0.12%	0.12%

TOTAL Energy (trillion Btu)	3.22	3.51	3.58	3.54	3.84	4.01
percent of state	1.04%	1.13%	1.15%	1.14%	1.24%	1.29%
Station Area	0.02	0.05	NA	NA	0.054	0.050
	0.008%	0.016%	NA	NA	0.017%	0.016%

Washington State Consumption Rates

Commercial Energy Consumption Rates

Electricty	47.1	kBtu/SF
NG	16.6	kBtu/SF

Source: Average Energy Use Intensity: Seattle Open Data, 2020 Building Energy Benchmarking
https://data.seattle.gov/dataset/2020-Building-Energy-Benchmarking/auez-gz8p/data

Industrial Energy Consumption Rates

Electricty	20.8	kBtu/SF
NG	10.4	kBtu/SF

Source: Average Energy Use Intensity: Seattle Open Data, 2020 Building Energy Benchmarking
https://data.seattle.gov/dataset/2020-Building-Energy-Benchmarking/auez-gz8p/data

Seattle Comprehensive Plan
Residential Electricity Consumption

2022 State of Washington

Electricity	310	trillion btu
Natural Gas	351	trillion btu

RESIDENTIAL

	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5	Preferred
Target Housing Growth (dwelling units)						
Single Family	1,389	698	1,111	1,111	1,111	4,132
Townhome	648	533	4,260	1,578	1,128	14,766
Multi-family Low Rise	2,593	1,977	14,247	5,522	4,056	6,675
Multi-family Mid Rise	75,370	96,792	80,382	91,789	113,705	94,427
Million Btu	1,285,659	1,581,937	1,644,496	1,605,522	1,910,979	2,080,703
Trillion Btu	1.29	1.58	1.64	1.61	1.91	2.08
percent of state	0.41%	0.51%	0.53%	0.52%	0.62%	0.67%

Station Area

	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5	Preferred
units	840	2,208			2,703	2,703
million btu	14,868	39,082			42,167	42,167
trillion btu	0.01	0.04			0.04	0.04
percent of state	0.0048%	0.0126%			0.0136%	0.0136%

	Electricity mbtu/unit	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Preferred
Single Family	35.2	1389	698	1111	1111	1111	4132
multifamily low rise	17.7	2593	1977	14247	5522	4056	6675
Townhome	23.3	648	533	4260	1578	1128	14766
multi family mid rise	15.6	75370	96792	80382	91789	113705	94427
		80000	100000	100000	100000	120000	120000

EIA, CE4.10 Annual Household site end-use consumption by fuel in the West - averages, 2015
https://www.eia.gov/consumption/residential/data/2015/index.php?view=consumption#by%20End%20uses%20by%20fuel

Seattle Comprehensive Plan
Natural Gas Consumption

2022 State of Washington

Electricity	310 trillion btu
Natural Gas	351 trillion btu

RESIDENTIAL

	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5	Preferred
Target Housing Growth (dwelling units)						
Single Family	1,389	698	1,111	1,111	1,111	4,132
Townhome	648	533	4,260	1,578	1,128	6,675
Multi-family Low Rise	2,593	1,977	14,247	5,522	4,056	14,766
Multi-family Mid Rise	75,370	96,792	80,382	91,789	113,705	94,427
Million Btu	1,285,659	1,581,937	1,644,496	1,605,522	1,910,979	2,035,393
Trillion Btu	1.29	1.58	1.64	1.61	1.91	2.04
percent of state	0.37%	0.45%	0.47%	0.46%	0.54%	0.58%

Station Area

	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5	Preferred
units	840	2,208	-	-	2,703	2,703
million btu	14,868	39,082	-	-	42,167	42,167
trillion btu	0.01	0.04	-	-	0.04	0.04
percent of state	0.0042%	0.0111%			0.0120%	0.0120%

COMMERCIAL

	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5	Preferred*
Target Commercial Growth(SF)	33,174,904	33,174,904	33,174,904	33,174,904	33,174,845	33,174,845
Estimated NG Demand (kBtu)	550,703,406	550,703,406	550,703,406	550,703,406	550,702,427	550,702,427
Million Btu	550,703	550,703	550,703	550,703	550,702	550,702
Trillion Btu	0.55	0.55	0.55	0.55	0.55	0.55
	0.18%	0.18%	0.18%	0.18%	0.18%	0.18%

Station Area

	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5	Preferred*
SF	178,948	244,963			251,033	164,500
Estimated NG Demand (kBtu)	2,970,537	4,066,386			4,167,148	2,730,700
million btu	2,971	4,066			4,167	2,731
trillion btu	0.0030	0.0041			0.0042	0.0027
percent of state	0.0002%	0.0002%			0.0002%	0.0002%

INDUSTRIAL

	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5	Preferred*
Target Industrial Growth(SF)	17,710,268	17,710,268	17,710,268	17,710,268	17,710,246	17,710,246
Estimated NG Demand (kBtu)	184,186,787	184,186,787	184,186,787	184,186,787	184,186,558	184,186,558
Million Btu	184,187	184,187	184,187	184,187	184,187	184,187
Trillion Btu	0.18	0.18	0.18	0.18	0.18	0.18
percent of state	0.06%	0.06%	0.06%	0.06%	0.06%	0.06%

TOTAL Energy (trillion Btu)	2.02	2.32	2.38	2.34	2.65	2.77
percent of state	0.58%	0.66%	0.68%	0.67%	0.75%	0.79%
Station Area	0.018	0.043			0.046	0.045
	0.005%	0.012%			0.013%	0.013%

Washington State Consumption Rates

Commercial Energy Consumption Rates

Electricty	47.1	kBtu/SF
NG	16.6	kBtu/SF

Source: Average Energy Use Intensity: Seattle Open Data, 2020 Building Energy Benchmarking
https://data.seattle.gov/dataset/2020-Building-Energy-Benchmarking/auez-gz8p/data

Industrial Energy Consumption Rates

Electricty	20.8	kBtu/SF
NG	10.4	kBtu/SF

Source: Average Energy Use Intensity: Seattle Open Data, 2020 Building Energy Benchmarking
https://data.seattle.gov/dataset/2020-Building-Energy-Benchmarking/auez-gz8p/data

Seattle Comprehensive Plan
Residential Natural Gas Consumption

2022 State of Washington

Electricity	310	trillion btu
Natural Gas	351	trillion btu

RESIDENTIAL

	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5	Preferred
Target Housing Growth (dwelling units)						
Single Family	1,389	698	1,111	1,111	1,111	4,132
Townhome	648	533	4,260	1,578	1,128	6,675
Multi-family Low Rise	2,593	1,977	14,247	5,522	4,056	14,766
Multi-family Mid Rise	75,370	96,792	80,382	91,789	113,705	94,427
Million Btu	1,285,659	1,581,937	1,644,496	1,605,522	1,910,979	2,035,393
Trillion Btu	1.29	1.58	1.64	1.61	1.91	2.04
percent of state	0.37%	0.45%	0.47%	0.46%	0.54%	0.58%

Station Area

	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5	Preferred
units	840	2,208			2,703	2,703
million btu	14,868	39,082			42,167	42,167
trillion btu	0.01	0.04			0.04	0.04
percent of state	0.0042%	0.0111%			0.0120%	0.0120%

	NG mbtu/unit		Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Preferred	Kbtu
Single Family		35.2	1389	698	1111	1111	1111	4132	35200
multifamily low rise		17.7	2593	1977	14247	5522	4056	6675	17700
Townhome		23.3	648	533	4260	1578	1128	14766	23300
multi family mid rise		15.6	75370	96792	80382	91789	113705	94427	15600
			80000	100000	100000	100000	120000	120000	

EIA, CE4.10 Annual Household site end-use consumption by fuel in the West - averages, 2015
https://www.eia.gov/consumption/residential/data/2015/index.php?view=consumption#by%20End%20uses%20by%20fuel

Seattle Comprehensive Plan
Housing Type Assumptions

Unit Type	CalEEMod Unit Type	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Preferred
Single Family	Single Family	1389	698	1111	1111	1111	4132
Small ADU	Multifamily low rise	2593	1977	14247	5522	4056	6675
Townhome	Townhome	648	533	4260	1578	1128	14766
Multi family	Multi family mid rise	75370	96792	80382	91789	113705	94427
		80000	100000	100000	100000	120000	120000

	Analysis Zone 1					Analysis Zone 2					Analysis Zone 3					Analysis Zone 4					Analysis Zone 5					Analysis Zone 6					Analysis Zone 7					Analysis Zone 8					Total			
Alternative 1	**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**
Urban Centers	-	-	-	-	-	14,654	6,049	19,048	6,740	-	4,290	3,595	12,017	2,646		26,610	18,265	91,768	90,214		11,536	9,061	3,359	3,359		-	-	-	-		-	-	-	-		-	-	-	-		57,090	36,970	126,192	102,959
Hub Urban Villages	16,404	7,588	28,714	6,504	-	4,159	927	2,216	622	-	-	-	-	-		-	-	-	-		-	-	-	-		4,004	3,128	1,597	1,597		10,128	1,242	15,699	3,053		34,695	12,885	48,226	11,776
Residential Urban Villages	12,708	3,822	5,090	2,020	-	2,188	1,466	936	366	-	638	402	289	283		1,314	1,010	613	281		5,309	3,193	2,751	1,067		5,792	1,143	2,081	897		1,156	259	2,116	450		11,961	3,469	4,729	2,373		41,066	14,764	18,605	7,735
Manufacturing Industrial Centers	-	-	-	-		-	-	-	-		542	628	4,064	6,100		-	-	-	-		-	-	-	-		-	-	-	-		2,086	848	17,070	12,700		-	-	-	-		2,628	1,476	21,134	18,800
Growth Area (Maritime Industrial)	-	-	-	-		-	-	-	-		-	-	-	-		-	-	-	-		148	144	90	-		-	-	-	-		535	392	317	-		144	140	81	-		827	676	488	-
Outside Subareas (This Alternative)	2,386	1,040	2,307	1,377	-	4,602	2,006	2,305	1,376	-	1,224	534	749	447		-	-	-	-		1,308	570	171	102		2,809	1,225	1,720	1,027		386	168	690	412		2,181	951	3,475	2,075		14,896	6,494	11,417	6,816
Outside Subareas (No Change All Alternatives)	2,987	1,302	3,348	1,999	-	5,381	2,346	2,977	1,777	-	1,971	859	1,775	1,060		316	138	398	238		656	286	275	164		1,567	683	2,569	1,533		602	262	1,687	1,007		1,970	859	3,578	2,136		15,450	6,735	16,607	9,914
Total	**34,485**	**13,752**	**39,459**	**11,900**	-	**30,984**	**12,794**	**27,482**	**10,881**	-	**8,665**	**6,018**	**18,894**	**10,534**		**28,240**	**19,413**	**92,779**	**90,733**		**18,957**	**13,254**	**6,646**	**4,692**		**14,172**	**6,179**	**7,967**	**5,054**		**4,765**	**1,929**	**21,880**	**14,569**		**26,384**	**6,661**	**27,562**	**9,637**		**166,652**	**80,000**	**242,669**	**158,000**
Share of Target		**17.2%**		**7.5%**			**16.0%**		**6.9%**			**7.5%**		**6.7%**			**24.3%**		**57.4%**			**16.6%**		**3.0%**			**7.7%**		**3.2%**			**2.4%**		**9.2%**			**8.3%**		**6.1%**					

	Analysis Zone 1					Analysis Zone 2					Analysis Zone 3					Analysis Zone 4					Analysis Zone 5					Analysis Zone 6					Analysis Zone 7					Analysis Zone 8					Total			
Alternative 2	**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**
Urban Centers	-	-	-	-	-	14,654	6,049	19,048	6,538	-	4,290	3,595	12,017	2,566		26,610	18,265	91,768	87,508		11,536	9,061	3,359	3,258		-	-	-	-		-	-	-	-		-	-	-	-		57,090	36,970	126,192	99,870
Hub Urban Villages	16,404	7,588	28,714	6,310	-	4,159	927	2,216	603	-	-	-	-	-		-	-	-	-		-	-	-	-		4,004	3,128	1,597	1,543		10,128	1,242	15,699	2,961		34,695	12,885	48,226	11,417
Residential Urban Villages	12,708	3,822	5,090	1,957	-	2,188	1,466	936	355	-	638	402	289	273		1,314	1,010	613	273		5,309	3,193	2,751	1,035		5,792	1,143	2,081	870		1,156	259	2,116	437		11,961	3,469	4,729	2,335		41,066	14,764	18,605	7,535
Manufacturing Industrial Centers	-	-	-	-		-	-	-	-		542	628	4,064	6,100		-	-	-	-		-	-	-	-		-	-	-	-		2,086	848	17,070	12,700		-	-	-	-		2,628	1,476	21,134	18,800
Growth Area (Maritime Industrial)	-	-	-	-		-	-	-	-		-	-	-	-		-	-	-	-		148	144	90	-		-	-	-	-		535	392	317	-		144	140	81	-		827	676	488	-
Neighborhood Anchor - Low Risk	2,399	5,394	2,199	2,236	-	4,171	6,541	2,078	2,198	-	953	2,402	741	857		-	-	-	-		942	3,430	186	723		669	1,706	207	441		-	-	-	-		159	546	35	128		9,293	20,019	5,446	6,583
Neighborhood Anchor - High Risk						390	453	99	122		-	-	-	-		-	-	-	-		-	-	-	-		1,700	2,308	1,485	1,217		384	506	690	471		636	881	159	235		3,110	4,148	2,433	2,045
Outside Subareas (This Alternative)	601	262	109	64	-	1,105	482	175	157	-	419	183	8	9		-	-	-	-		498	217	32	19		1,052	459	28	22		9	4	-	-		1,652	720	3,280	1,866		5,336	2,327	3,632	2,119
Outside Subareas (No Change All Alternatives)	2,987	1,302	3,348	1,939	-	5,381	2,346	2,977	1,724	-	1,971	859	1,775	1,028		316	138	398	230		656	286	275	159		1,567	683	2,569	1,488		602	262	1,687	977		1,970	859	3,578	2,072		15,450	6,735	16,607	9,617
Total	**35,099**	**18,368**	**39,460**	**12,506**	-	**32,048**	**18,264**	**27,529**	**11,697**	-	**8,813**	**8,069**	**18,894**	**10,829**		**28,240**	**19,413**	**92,779**	**88,011**		**19,089**	**16,331**	**6,693**	**5,194**		**14,784**	**9,427**	**7,967**	**5,581**		**4,772**	**2,271**	**21,880**	**14,585**		**26,650**	**7,857**	**27,561**	**9,597**		**169,495**	**100,000**	**242,763**	**158,000**
Share of Target		**18.4%**		**7.9%**			**18.3%**		**7.4%**			**8.1%**		**6.9%**			**19.4%**		**55.7%**			**16.3%**		**3.3%**			**9.4%**		**3.5%**			**2.3%**		**9.2%**			**7.9%**		**6.1%**					

	Analysis Zone 1					Analysis Zone 2					Analysis Zone 3					Analysis Zone 4					Analysis Zone 5					Analysis Zone 6					Analysis Zone 7					Analysis Zone 8					Total			
Alternative 3	**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**
Urban Centers	-	-	-	-	-	14,654	6,049	19,048	6,538	-	4,290	3,595	12,017	2,566		26,610	18,265	91,768	87,508		11,536	9,061	3,359	3,258		-	-	-	-		-	-	-	-		-	-	-	-		57,090	36,970	126,192	99,870
Hub Urban Villages	16,404	7,588	28,714	6,310	-	4,159	927	2,216	603	-	-	-	-	-		-	-	-	-		-	-	-	-		4,004	3,128	1,597	1,543		10,128	1,242	15,699	2,961		34,695	12,885	48,226	11,417
Residential Urban Villages	12,708	3,822	5,090	1,957	-	2,188	1,466	936	355	-	638	402	289	273		1,314	1,010	613	273		5,309	3,193	2,751	1,035		5,792	1,143	2,081	870		1,156	259	2,116	437		11,961	3,469	4,729	2,335		41,066	14,764	18,605	7,535
Manufacturing Industrial Centers	-	-	-	-		-	-	-	-		542	628	4,064	6,100		-	-	-	-		-	-	-	-		-	-	-	-		2,086	848	17,070	12,700		-	-	-	-		2,628	1,476	21,134	18,800
Growth Area (Maritime Industrial)	-	-	-	-		-	-	-	-		-	-	-	-		-	-	-	-		148	144	90	-		-	-	-	-		535	392	317	-		144	140	81	-		827	676	488	-
Neighborhood Residential	9,210	4,095	123	754	-	17,892	7,921	154	221	-	1,680	875	24	18		-	-	-	-		1,218	741	37	284		9,654	4,480	15	23		41	21	-	-		8,589	4,290	3,176	4,606		48,284	22,423	3,529	5,906
Outside Subareas (This Alternative)	1,741	760	2,193	1,330	-	3,429	1,497	2,156	1,389	-	812	355	721	439		-	-	-	-		767	334	139	80		1,702	743	1,707	1,056		376	165	690	401		498	217	277	153		9,325	4,071	7,883	4,855
Outside Subareas (No Change All Alternatives)	2,987	1,302	3,348	1,939	-	5,381	2,346	2,977	1,724	-	1,971	859	1,775	1,028		316	138	398	230		656	286	275	159		1,567	683	2,569	1,488		602	262	1,687	977		1,970	859	3,578	2,072		15,450	6,735	16,607	9,617
Total	**43,050**	**17,567**	**39,468**	**12,290**	-	**47,703**	**20,206**	**27,487**	**10,830**	-	**9,933**	**6,714**	**18,890**	**10,424**		**28,240**	**19,413**	**92,779**	**88,011**		**19,634**	**13,759**	**6,651**	**4,823**		**22,719**	**10,177**	**7,969**	**4,980**		**4,796**	**1,947**	**21,880**	**14,515**		**33,290**	**10,217**	**27,540**	**12,127**		**209,365**	**100,000**	**242,664**	**158,000**
Share of Target		**17.6%**		**7.8%**			**20.2%**		**6.9%**			**6.7%**		**6.6%**			**19.4%**		**55.7%**			**13.8%**		**3.1%**			**10.2%**		**3.2%**			**1.9%**		**9.2%**			**10.2%**		**7.7%**					

	Analysis Zone 1					Analysis Zone 2					Analysis Zone 3					Analysis Zone 4					Analysis Zone 5					Analysis Zone 6					Analysis Zone 7					Analysis Zone 8					Total			
Alternative 4	**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**
Urban Centers	-	-	-	-	-	14,654	6,049	19,048	6,538	-	4,290	3,595	12,017	2,566		26,610	18,265	91,768	87,508		11,536	9,061	3,359	3,258		-	-	-	-		-	-	-	-		-	-	-	-		57,090	36,970	126,192	99,870
Hub Urban Villages	16,404	7,588	28,714	6,310	-	4,159	927	2,216	603	-	-	-	-	-		-	-	-	-		-	-	-	-		4,004	3,128	1,597	1,543		10,128	1,242	15,699	2,961		34,695	12,885	48,226	11,417
Residential Urban Villages	12,708	3,822	5,090	1,957	-	2,188	1,466	936	355	-	638	402	289	273		1,314	1,010	613	273		5,309	3,193	2,751	1,035		5,792	1,143	2,081	870		1,156	259	2,116	437		11,961	3,469	4,729	2,335		41,066	14,764	18,605	7,535
Manufacturing Industrial Centers	-	-	-	-		-	-	-	-		542	628	4,064	6,100		-	-	-	-		-	-	-	-		-	-	-	-		2,086	848	17,070	12,700		-	-	-	-		2,628	1,476	21,134	18,800
Growth Area (Maritime Industrial)	-	-	-	-		-	-	-	-		-	-	-	-		-	-	-	-		148	144	90	-		-	-	-	-		535	392	317	-		144	140	81	-		827	676	488	-
Neighborhood Residential-Corridor	5,081	3,579	104	1,165	-	12,150	8,484	15	129	-	914	694	-	-		-	-	-	-		816	719	37	449		5,718	4,114	1	12		41	33	-	-		4,744	3,584	175	2,155		29,464	21,207	332	3,910
Outside Subareas (This Alternative)	2,090	910	2,212	1,371	-	4,063	1,769	2,295	1,549	-	1,055	460	741	447		-	-	-	-		929	404	139	91		2,277	993	1,720	1,098		376	164	690	401		1,347	587	3,284	1,894		12,137	5,287	11,081	6,851
Outside Subareas (No Change All Alternatives)	2,987	1,302	3,348	1,939	-	5,381	2,346	2,977	1,724	-	1,971	859	1,775	1,028		316	138	398	230		656	286	275	159		1,567	683	2,569	1,488		602	262	1,687	977		1,970	859	3,578	2,072		15,450	6,735	16,607	9,617
Total	**39,270**	**17,201**	**39,468**	**12,742**	-	**42,595**	**21,041**	**27,487**	**10,898**	-	**9,410**	**6,638**	**18,886**	**10,414**		**28,240**	**19,413**	**92,779**	**88,011**		**19,394**	**13,807**	**6,651**	**4,992**		**19,358**	**10,061**	**7,968**	**5,011**		**4,796**	**1,958**	**21,880**	**14,515**		**30,294**	**9,881**	**27,546**	**11,417**		**193,357**	**100,000**	**242,665**	**158,000**
Share of Target		**17.2%**		**8.1%**			**21.0%**		**6.9%**			**6.6%**		**6.6%**			**19.4%**		**55.7%**			**13.8%**		**3.2%**			**10.1%**		**3.2%**			**2.0%**		**9.2%**			**9.9%**		**7.2%**					

	Analysis Zone 1					Analysis Zone 2					Analysis Zone 3					Analysis Zone 4					Analysis Zone 5					Analysis Zone 6					Analysis Zone 7					Analysis Zone 8					Total			
Alternative 5	**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**
Urban Centers	5,601	6,042	4,129	4,097	-	14,654	6,049	19,048	6,403	-	4,367	3,634	12,017	2,514		26,610	18,265	91,768	85,703		11,536	9,061	3,359	3,197		-	-	-	-		-	-	-	-		-	-	-	-		62,768	43,051	130,321	101,908
Hub Urban Villages	10,803	2,546	24,585	2,256	-	4,159	927	2,216	591	-	-	-	-	-		-	-	-	-		-	-	-	-		4,071	3,140	1,612	1,526		-	-	-	-		10,128	1,242	15,699	2,900		29,161	7,855	44,112	7,273
Residential Urban Villages	12,998	3,838	5,108	1,928	-	10,440	3,110	1,852	704	-	708	429	289	267		1,314	1,010	613	267		5,317	3,194	2,751	1,014		6,048	2,884	2,081	1,152		1,156	1,659	2,116	671		12,079	6,738	4,827	2,875		50,060	22,862	19,637	8,878
Manufacturing Industrial Centers	-	-	-	-	-	-	-	-	-	-	542	628	4,064	6,100		-	-	-	-		-	-	-	-		-	-	-	-		2,086	848	17,070	12,700		-	-	-	-		2,628	1,476	21,134	18,800
Growth Area (Maritime Industrial)	-	-	-	-	-	-	-	-	-	-	-	-	-	-		-	-	-	-		148	144	90	-		-	-	-	-		535	392	317	-		144	140	81	-		827	676	488	-
Neighborhood Anchor - Low Risk	2,399	4,495	2,199	1,893	-	4,811	5,127	1,455	1,799	-	953	2,002	741	707		-	-	-	-		942	2,830	186	510		669	1,406	207	333		-	-	-	-		159	446	35	92		9,933	16,306	4,823	5,334
Neighborhood Anchor - High Risk	-	-	-	-	-	-	-	-	-	-	-	-	-	-		-	-	-	-		-	-	-	-		1,373	2,083	1,485	1,101		377	461	690	443		452	791	160	194		2,202	3,335	2,335	1,738
Neighborhood Residential	4,033	1,885	6	6	-	5,487	2,569	84	84	-	591	310	4	4		-	-	-	-		395	240	-	-		3,777	1,878	14	14		-	-	-	-		3,716	1,966	2,988	3,005		17,999	8,848	3,096	3,113
Neighborhood Residential-Corridor	4,229	1,390	93	457	-	10,616	3,429	10	49	-	801	305	-	-		-	-	-	-		650	346	36	177		4,887	1,674	1	5		33	14	-	-		4,458	1,698	173	850		25,674	8,856	313	1,538
Outside Subareas (This Alternative)	-	-	-	-	-	-	-	-	-	-	-	-	-	-		-	-	-	-		-	-	-	-		-	-	-	-		-	-	-	-		-	-	-	-		-	-	-	-
Outside Subareas (No Change All Alternatives)	2,987	1,302	3,348	1,899	-	5,381	2,346	2,977	1,688	-	1,971	859	1,775	1,001		316	138	398	236		656	286	275	156		1,567	683	2,569	1,457		602	262	1,687	956		1,970	859	3,578	2,029		15,450	6,735	16,607	9,418
Total	**43,050**	**21,498**	**39,468**	**12,536**	-	**55,548**	**23,557**	**27,642**	**11,318**	-	**9,933**	**8,167**	**18,890**	**10,599**		**28,240**	**19,413**	**92,779**	**86,196**		**19,644**	**16,101**	**6,697**	**5,048**		**22,392**	**13,748**	**7,969**	**5,588**		**4,789**	**3,636**	**21,880**	**14,770**		**33,106**	**13,880**	**27,541**	**11,945**		**216,702**	**120,000**	**242,866**	**158,000**
Share of Target		**17.9%**		**7.9%**			**19.6%**		**7.2%**			**6.8%**		**6.7%**			**16.2%**		**54.6%**			**13.4%**		**3.2%**			**11.5%**		**3.5%**			**3.0%**		**9.3%**			**11.6%**		**7.6%**					

Housing

	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5
Area 1 Northwest	17.2%	18.4%	17.6%	17.2%	17.9%
Area 2 Northeast	16.0%	18.3%	20.2%	21.0%	19.6%
Area 3 West	7.5%	8.1%	6.7%	6.6%	6.8%
Area 4 Downtown	24.3%	19.4%	19.4%	19.4%	16.2%
Area 5 East	16.6%	16.3%	13.8%	13.8%	13.4%
Area 6 Southwest	7.7%	9.4%	10.2%	10.1%	11.5%
Area 7 Duwamish Manufacturing Center	2.4%	2.3%	1.9%	2.0%	3.0%
Area 8 Southeast	8.3%	7.9%	10.2%	9.9%	11.6%
Total	100.0%	100.0%	100.0%	100.0%	100.0%

Jobs

	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5
Area 1 Northwest	7.5%	7.9%	7.8%	8.1%	7.9%
Area 2 Northeast	6.9%	7.4%	6.9%	6.9%	7.2%
Area 3 West	6.7%	6.9%	6.6%	6.6%	6.7%
Area 4 Downtown	57.4%	55.7%	55.7%	55.7%	54.6%
Area 5 East	3.0%	3.3%	3.1%	3.2%	3.2%
Area 6 Southwest	3.2%	3.5%	3.2%	3.2%	3.5%
Area 7 Duwamish Manufacturing Center	9.2%	9.2%	9.2%	9.2%	9.3%
Area 8 Southeast	6.1%	6.1%	7.7%	7.2%	7.6%
Total	100.0%	100.0%	100.0%	100.0%	100.0%

Square Footage

Using Job Targets 250 square feet

Commercial Square Feet

	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5
Area 1 Northwest	2,618,000	2,751,320	2,703,800	2,803,240	2,737,820
Area 2 Northeast	2,193,820	2,573,340	2,382,600	2,397,560	2,489,960
Area 3 West	1,803,167	1,868,067	1,778,967	1,776,767	1,817,467
Area 4 Downtown	19,961,240	19,362,420	19,362,420	19,362,420	18,961,120
Area 5 East	1,032,240	1,162,680	1,061,060	1,098,240	1,110,560
Area 6 Southwest	1,111,880	1,227,820	1,095,600	1,102,420	1,229,360
Area 7 Duwamish Manufacturing Center	2,134,397	2,107,917	2,122,517	2,122,517	2,178,358
Area 8 Southeast	2,120,140	2,311,940	2,467,940	2,511,760	2,627,900
Total	33,174,904	33,174,904	33,174,904	33,174,904	33,174,845
	132,700	132,700	132,700	132,700	132,699

Using Job Targets 700 square feet

Industrial Square Feet

	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5
Area 1 Northwest	999,600	1,050,504	1,032,360	1,070,328	1,053,024
Area 2 Northeast	914,004	982,548	909,720	915,432	950,712
Area 3 West	2,324,932	2,349,712	2,315,692	2,314,852	2,330,392
Area 4 Downtown	7,621,572	7,392,924	7,392,924	7,392,924	7,240,464
Area 5 East	394,128	436,296	405,132	419,328	424,032
Area 6 Southwest	424,536	468,804	418,320	420,924	469,392
Area 7 Duwamish Manufacturing Center	4,221,988	4,220,332	4,217,452	4,217,452	4,238,840
Area 8 Southeast	809,508	806,148	1,018,668	959,028	1,003,380
Total	17,710,268	17,710,268	17,710,268	17,710,268	17,710,246
	25,300	25,300	25,300	25,300	25,300

	Split %Com	%Ind
SIML	54%	46%
General	88%	12.0%

SIML and UGC Jobs/Sq Ft
SIML Job Splits in MIC
Citywide excluding SIML 88% comm and 12% ind per Census On the Map 2019

Potential Job Sector Split

Notes:
Assume less SF in Downtown Office
Ensure 10% higher retail/service in neighborhoods
For MIC, match SIML EIS

Jobs per SF in King County UGC for Seattle

	Commercial	Industrial
Low	275	500
High	300	700

https://kingcounty.gov/~/media/depts/executive/performance-strategy-budget/regional-planning/GrowthManagement/GMPC-2021/GMPC-Meeting-062321/KC-UGC-Final-Draft-Report-June-2021.ashx?la=en

Suggest using SIML Assumptions

250	700

For office shows some smaller square feet which may be appropriate given change in Downtown/elsewhere due to COVID effects. For Industrial shows higher range and still similar to SIML for conservative Air Q.

JOBS per SF: CAI, September 1, 2020: Seattle Maritime and Industrial StrategyEmployment Trends and Land Use Alternatives Analysis

Absorption Assumptions: Required Redevelopment Land

Absorption assumptions by subarea expressed as square feet of land per job are used to determine the required land to be redeveloped to accommodate the assumed employment growth. Square feet of land per job is calculated by dividing square feet of building area per job

Exhibit 24. Absorption Assumptions by Subarea, No Action Alternative, 2035

Sources: Puget Sound Regional Council, 2020; Community Attributes Inc., 2020.

Land Use	Industry	Ballard	Interbay/ Uptown	Interbay/ SeattleCenter	SODO/ Stadium	South Park/ Georgetown
Other	Hospitality & Tourism	1,400	1,400	1,200	1,000	700
Ind	Construction and Utilities	850	1,400	1,571	1,000	700
Com & Off	ICT	365	900	577	571	529
Ind	Distribution & Commerce	850	1,400	1,571	1,000	700
Ind	Food & Beverage Production	850	1,400	1,571	1,000	700
Ind	Aerospace	850	1,400	1,571	1,000	700
Ind	Transportation & Logistics	850	1,400	1,571	1,000	700
Ind	Maritime	850	1,400	1,571	1,000	700
Ind	Other Manufacturing	850	1,400	1,571	1,000	700
Com & Off	All Other Retail	365	900	577	571	529
Com & Off	All Other Services	365	900	577	571	529
Gov & Edi	Government	1,000	1,000	1,000	429	371
Gov & Edi	Education	1,000	1,000	1,000	429	371

SECTOR SPLITS: CAI, September 1, 2020: Seattle Maritime and Industrial StrategyEmployment Trends and Land Use Alternatives Analysis

Total Historic and Projected Employment by Industry, City of Seattle, 2010-2035

Sources: Bureau of Labor Statistics, 2020; Puget Sound Regional Council, 2020; Washington State Employment Security Department, 2020; Community Attributes Inc., 2020.

	2010	2015	2018	2035	2018-2035 CAGR	2018-2035 Growth
All Other Services	209,800	232,600	249,500	280,400	0.7%	30,900
Hospitality & Tourism	52,800	63,400	70,800	95,300	1.8%	24,500
Distribution & E-commerce	20,500	38,700	60,400	104,400	3.3%	44,000
Education	58,900	66,500	59,000	58,400	-0.1%	-600
ICT	23,900	36,000	50,400	129,400	5.7%	79,000
Government	48,700	46,600	49,400	49,000	0.0%	-400
Construction and Utilities	23,200	27,400	34,400	52,900	2.6%	18,500
All Other Retail	21,900	23,400	23,000	24,500	0.4%	1,500
Food & Beverage Productio	13,100	15,900	16,500	22,600	1.9%	6,100
Maritime	16,500	15,100	15,600	15,900	0.1%	300
Other Manufacturing	10,900	11,200	10,600	8,300	-1.4%	-2,300
Transportation & Logistics	7,200	7,700	9,100	11,800	1.5%	2,700
Aerospace	9,500	8,700	7,900	7,900	0.0%	0
Suppressed	100	100	200	200	0.0%	0
Total	517,100	593,000	656,800	861,000	1.6%	204,200

Estimate 2035 Share by Jobs and apply?

Commercial
Commercial
Industrial
Commercial
Commercial
Commercial
Industrial
Commercial
Industrial
Industrial
Industrial
Industrial
Industrial

SIML Emp SF

Base Year Split	Industrial	Non-Industrial
BINMIC	6,783,129	5,375,837
Greater Duwamish	34632076	13,896,776
Total	**41,415,205**	**19,272,613**

Preferred Alternative - Balanced Gross

Industrial Emp	Total Emp	% Industrial
70,853	134,045	52.9%

Preferred Alternative - Balanced Net

Industrial Emp	Total Emp	% Industrial
16,253	35,545	45.7%

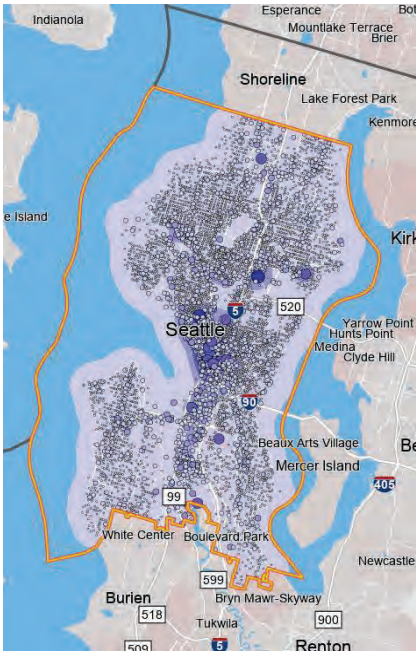
Industrial	Commercial
46%	54%

Questions
Assume all Commercial in neighborhoods?
Assume SIMIL breakdown in MICs? By Jobs or SF?

SECTOR SPLITS: Census on the Map, Total Jobs

Jobs by N/	Citywide 2019		SIML 2019		Citywide Minus SIML 2019
	Count	Share	Count	Share	
Agriculture,	1,261	0.2%	741	1.0%	520
Mining, Qua	135	0.0%	48	0.1%	87
Utilities	3,312	0.6%	168	0.2%	3,144
Constructior	24,590	4.2%	6,653	8.9%	17,937
Manufacturi	27,519	4.7%	16,482	22.2%	11,037
Wholesale T	20,904	3.6%	7,200	9.7%	13,704
Retail Trade	40,787	7.0%	4,593	6.2%	36,194
Transportati	23,520	4.0%	6,334	8.5%	17,186
Information	36,909	6.3%	4,143	5.6%	32,766
Finance and	20,464	3.5%	397	0.5%	20,067
Real Estate	13,993	2.4%	1,373	1.8%	12,620
Professional	76,267	13.1%	4,219	5.7%	72,048
Managemer	18,644	3.2%	7,103	9.5%	11,541
Administratic	24,073	4.1%	2,802	3.8%	21,271
Educational	45,713	7.8%	813	1.1%	44,900
Health Care	89,138	15.3%	1,625	2.2%	87,513
Arts, Enterta	14,268	2.4%	2,219	3.0%	12,049
Accommoda	55,410	9.5%	4,955	6.7%	50,455
Other Servic	26,194	4.5%	2,357	3.2%	23,837
Public Admi	19,695	3.4%	157	0.2%	19,538

Citywide			SIML			Citywide Minus SIML		
Total	Industrial	Ind Share	Total	Industrial	Ind Share	Total	Industrial	Ind Share
582,796	101,241	17.37%	74,382	37,626	50.58%	508,414	63,615	12.51%



F Noise Appendix

FHWA Highway Noise Prediction Model (FHWA-RD-77-108)

Project Name: One Seattle Comprehensive Plan
Project Number: 90074000
Scenario: Existing
Ldn/CNEL: CNEL

Assumed 24-Hour Traffic Distribution:	Day	Evening	Night
Total ADT Volumes	77.70%	12.70%	9.60%
Medium-Duty Trucks	87.43%	5.05%	7.52%
Heavy-Duty Trucks	89.10%	2.84%	8.06%

								Vehicle Mix		Distance from Centerline of Roadway			
				Median	ADT	Speed	Alpha	Medium	Heavy	CNEL at	Distance to Contour			
#	Roadway	Segment	Lanes	Width	Volume	(mph)	Factor	Trucks	Trucks	150 Feet	70 CNEL	65 CNEL	60 CNEL	55 CNEL
1	Martin Luther King Jr Way S	Between S Jackson St and S Massachusetts St	2	0	15,426	25	0	2.0%	1.0%	58.4	-	33	105	332
2	Martin Luther King Jr Way S	Between S Orcas St and S Graham St	4	28	20,000	25	0	2.0%	1.0%	59.7	-	-	139	440
3	Harbor Ave SW/Alki Ave SW	Between SW Admiral Way and California Way SW	2	14	12,240	25	0	2.0%	1.0%	57.5	-	-	83	264
4	Beacon Ave S	Between S Spokane St and S Columbian Way	2	14	6,677	25	0	2.0%	1.0%	54.8	-	-	46	144
5	34th Ave W	Between W Barrett St and W McGraw St	2	0	5,893	25	0	2.0%	1.0%	54.3	-	-	40	127
6	Roosevelt Way NE	Between NE Northgate Way and 80th St	2	0	10,233	25	0	2.0%	1.0%	56.7	-	-	70	220
7	Roosevelt Way NE	Between 5th Ave NE and 10th Ave NE	4	0	19,461	30	0	2.0%	1.0%	60.9	-	59	186	588
8	15th Ave NE	Between NE 135th St and NE 145th St	4	14	16,860	25	0	2.0%	1.0%	58.9	-	-	116	367

[1] Distance is from the centerline of the roadway segment to the receptor location.
"-" = contour is located within the roadway right-of-way.

FHWA Highway Noise Prediction Model (FHWA-RD-77-108)

Project Name: One Seattle Comprehensive Plan
Project Number: 90074000
Scenario: Horizon Year Plus Project Alternative 1
Ldn/CNEL: CNEL

Assumed 24-Hour Traffic Distribution:	Day	Evening	Night
Total ADT Volumes	77.70%	12.70%	9.60%
Medium-Duty Trucks	87.43%	5.05%	7.52%
Heavy-Duty Trucks	89.10%	2.84%	8.06%

								Vehicle Mix			Distance from Centerline of Roadway			
				Median	ADT	Speed	Alpha	Medium	Heavy	CNEL at	Distance to Contour			
#	Roadway	Segment	Lanes	Width	Volume	(mph)	Factor	Trucks	Trucks	59.0	70 CNEL	65 CNEL	60 CNEL	55 CNEL
1	Martin Luther King Jr Way S	Between S Jackson St and S Massach	2	0	19,300	25	0	2.0%	1.0%	59.4	-	42	131	415
2	Martin Luther King Jr Way S	Between S Orcas St and S Graham St	4	28	24,700	25	0	2.0%	1.0%	60.6	-	-	172	543
3	Harbor Ave SW/Alki Ave SW	Between SW Admiral Way and Califor	2	14	13,500	25	0	2.0%	1.0%	57.9	-	-	92	291
4	Beacon Ave S	Between S Spokane St and S Columb	2	14	7,300	25	0	2.0%	1.0%	55.2	-	-	50	157
5	34th Ave W	Between W Barrett St and W McGraw	2	0	6,500	25	0	2.0%	1.0%	54.7	-	-	44	140
6	90074000	Between NE Northgate Way and 80th	2	0	11,100	25	0	2.0%	1.0%	57.0	-	-	75	239
7	Roosevelt Way NE	Between 5th Ave NE and 10th Ave NE	4	0	19,900	30	0	2.0%	1.0%	61.0	-	60	190	601
8	15th Ave NE	Between NE 135th St and NE 145th S	4	14	20,700	25	0	2.0%	1.0%	59.8	-	-	143	451

[1] Distance is from the centerline of the roadway segment to the receptor location.
"-" = contour is located within the roadway right-of-way.

FHWA Highway Noise Prediction Model (FHWA-RD-77-108)

Project Name: One Seattle Comprehensive Plan
Project Number: 90074000
Scenario: Horizon Year Plus Project Alternative 2
Ldn/CNEL: CNEL

Assumed 24-Hour Traffic Distribution:	Day	Evening	Night
Total ADT Volumes	77.70%	12.70%	9.60%
Medium-Duty Trucks	87.43%	5.05%	7.52%
Heavy-Duty Trucks	89.10%	2.84%	8.06%

								Vehicle Mix		Distance from Centerline of Roadway				
				Median	ADT	Speed	Alpha	Medium	Heavy	CNEL at	Distance to Contour			
#	Roadway	Segment	Lanes	Width	Volume	(mph)	Factor	Trucks	Trucks	150 Feet	70 CNEL	65 CNEL	60 CNEL	55 CNEL
1	Martin Luther King Jr Way S	Between S Jackson St and S Massacl	2	0	19,500	25	0	2.0%	1.0%	59.5	-	42	133	419
2	Martin Luther King Jr Way S	Between S Orcas St and S Graham St	4	28	25,000	25	0	2.0%	1.0%	60.6	-	-	174	550
3	Harbor Ave SW/Alki Ave SW	Between SW Admiral Way and Califor	2	14	13,500	25	0	2.0%	1.0%	57.9	-	-	92	291
4	Beacon Ave S	Between S Spokane St and S Columb	2	14	7,600	25	0	2.0%	1.0%	55.4	-	-	52	164
5	34th Ave W	Between W Barrett St and W McGraw	2	0	7,100	25	0	2.0%	1.0%	55.1	-	-	48	153
6	Roosevelt Way NE	Between NE Northgate Way and 80th	2	0	12,000	25	0	2.0%	1.0%	57.4	-	-	82	258
7	Roosevelt Way NE	Between 5th Ave NE and 10th Ave NE	4	0	21,100	30	0	2.0%	1.0%	61.3	-	64	202	638
8	15th Ave NE	Between NE 135th St and NE 145th S	4	14	21,700	25	0	2.0%	1.0%	60.0	-	-	150	473

[1] Distance is from the centerline of the roadway segment to the receptor location.
"-" = contour is located within the roadway right-of-way.

FHWA Highway Noise Prediction Model (FHWA-RD-77-108)

Project Name: One Seattle Comprehensive Plan
Project Number: 90074000
Scenario: Horizon Year Plus Project Alternative 3
Ldn/CNEL: CNEL

Assumed 24-Hour Traffic Distribution:	Day	Evening	Night
Total ADT Volumes	77.70%	12.70%	9.60%
Medium-Duty Trucks	87.43%	5.05%	7.52%
Heavy-Duty Trucks	89.10%	2.84%	8.06%

								Vehicle Mix		Distance from Centerline of Roadway				
				Median	ADT	Speed	Alpha	Medium	Heavy	CNEL at	Distance to Contour			
#	Roadway	Segment	Lanes	Width	Volume	(mph)	Factor	Trucks	Trucks	150 Feet	70 CNEL	65 CNEL	60 CNEL	55 CNEL
1	Martin Luther King Jr Way S	Between S Jackson St and S Massacl	2	0	19,300	25	0	2.0%	1.0%	59.4	-	42	131	415
2	Martin Luther King Jr Way S	Between S Orcas St and S Graham St	4	28	25,500	25	0	2.0%	1.0%	60.7	-	-	177	561
3	Harbor Ave SW/Alki Ave SW	Between SW Admiral Way and Califor	2	14	13,700	25	0	2.0%	1.0%	57.9	-	-	93	296
4	Beacon Ave S	Between S Spokane St and S Columb	2	14	8,000	25	0	2.0%	1.0%	55.6	-	-	55	173
5	34th Ave W	Between W Barrett St and W McGraw	2	0	7,000	25	0	2.0%	1.0%	55.0	-	-	48	151
6	Roosevelt Way NE	Between NE Northgate Way and 80th	2	0	12,400	25	0	2.0%	1.0%	57.5	-	-	84	267
7	Roosevelt Way NE	Between 5th Ave NE and 10th Ave NE	4	0	21,900	30	0	2.0%	1.0%	61.4	-	66	209	662
8	15th Ave NE	Between NE 135th St and NE 145th S	4	14	21,700	25	0	2.0%	1.0%	60.0	-	-	150	473

[1] Distance is from the centerline of the roadway segment to the receptor location.
"-" = contour is located within the roadway right-of-way.

FHWA Highway Noise Prediction Model (FHWA-RD-77-108)

Project Name: One Seattle Comprehensive Plan
Project Number: 90074000
Scenario: Horizon Year Plus Project Alternative 5
Ldn/CNEL: CNEL

Assumed 24-Hour Traffic Distribution:	Day	Evening	Night
Total ADT Volumes	77.70%	12.70%	9.60%
Medium-Duty Trucks	87.43%	5.05%	7.52%
Heavy-Duty Trucks	89.10%	2.84%	8.06%

								Vehicle Mix		Distance from Centerline of Roadway				
				Median	ADT	Speed	Alpha	Medium	Heavy	CNEL at	Distance to Contour			
#	Roadway	Segment	Lanes	Width	Volume	(mph)	Factor	Trucks	Trucks	150 Feet	70 CNEL	65 CNEL	60 CNEL	55 CNEL
1	Martin Luther King Jr Way S	Between S Jackson St and S Massacl	2	0	19,500	25	0	2.0%	1.0%	59.5	-	42	133	419
2	Martin Luther King Jr Way S	Between S Orcas St and S Graham St	4	28	25,900	25	0	2.0%	1.0%	60.8	-	-	180	570
3	Harbor Ave SW/Alki Ave SW	Between SW Admiral Way and Califor	2	14	13,900	25	0	2.0%	1.0%	58.0	-	-	95	300
4	Beacon Ave S	Between S Spokane St and S Columb	2	14	8,400	25	0	2.0%	1.0%	55.8	-	-	57	181
5	34th Ave W	Between W Barrett St and W McGraw	2	0	7,000	25	0	2.0%	1.0%	55.0	-	-	48	151
6	Roosevelt Way NE	Between NE Northgate Way and 80th	2	0	12,500	25	0	2.0%	1.0%	57.5	-	-	85	269
7	Roosevelt Way NE	Between 5th Ave NE and 10th Ave NE	4	0	22,200	30	0	2.0%	1.0%	61.5	-	67	212	671
8	15th Ave NE	Between NE 135th St and NE 145th S	4	14	22,600	25	0	2.0%	1.0%	60.2	-	-	156	493

[1] Distance is from the centerline of the roadway segment to the receptor location.
"-" = contour is located within the roadway right-of-way.

FHWA Highway Noise Prediction Model (FHWA-RD-77-108)

Project Name:	One Seattle Comprehensive Plan	
Project Number:	90074000	
Scenario:	Horizon Year Plus Project	Preferred Alternataive
Ldn/CNEL:	CNEL	

Assumed 24-Hour Traffic Distribution:	Day	Evening	Night
Total ADT Volumes	77.70%	12.70%	9.60%
Medium-Duty Trucks	87.43%	5.05%	7.52%
Heavy-Duty Trucks	89.10%	2.84%	8.06%

										Vehicle Mix		Distance from Centerline of Roadway		
				Median	ADT	Speed	Alpha	Medium	Heavy	CNEL at	Distance to Contour			
#	Roadway	Segment	Lanes	Width	Volume	(mph)	Factor	Trucks	Trucks	150 Feet	70 CNEL	65 CNEL	60 CNEL	55 CNEL
1	Martin Luther King Jr Way S	Between S Jackson St and S Massach	2	0	20,700	25	0	2.0%	1.0%	59.7	-	45	141	445
2	Martin Luther King Jr Way S	Between S Orcas St and S Graham St	4	28	26,800	25	0	2.0%	1.0%	60.9	-	59	186	590
3	Harbor Ave SW/Alki Ave SW	Between SW Admiral Way and Califor	2	14	15,900	25	0	2.0%	1.0%	58.6	-	-	108	343
4	Beacon Ave S	Between S Spokane St and S Columb	2	14	11,500	25	0	2.0%	1.0%	57.2	-	-	78	248
5	34th Ave W	Between W Barrett St and W McGraw	2	0	8,300	25	0	2.0%	1.0%	55.8	-	-	56	179
6	Roosevelt Way NE	Between NE Northgate Way and 80th	2	0	14,800	25	0	2.0%	1.0%	58.3	-	-	101	318
7	Roosevelt Way NE	Between 5th Ave NE and 10th Ave NE	4	0	24,300	30	0	2.0%	1.0%	61.9	-	73	232	734
8	15th Ave NE	Between NE 135th St and NE 145th S	4	14	16,000	25	0	2.0%	1.0%	58.7	-	-	110	349

[1] Distance is from the centerline of the roadway segment to the receptor location.

"-" = contour is located within the roadway right-of-way.

G Land Use Appendices

G.1 Land Use Existing Conditions Tables
G.2 Updating Seattle's Neighborhood Residential Zones
G.3 NR Tree Analysis
G.4 Redevelopable Area per Dwelling

G.1 Land Use Existing Conditions Tables

App Exhibit G.1-1. Generalized Zoning Categories

Zoning Designation	Description
Neighborhood Residential 1, 2, and 3 NR1, NR2, and NR3	Areas characterized by houses, also known as detached single-family dwelling units, on lots of a compatible scale and character. The NR1, NR2, and NR3 zone designations correspond to the minimum lot size required for each single-family dwelling unit (9,600 sf, 7,200 sf, and 5,000 sf respectively). Allowed housing types include one detached house per lot, with up to two attached ADUs within the same structure or up to one attached ADU and one detached ADU.
Neighborhood Residential Small Lot RSL	Areas allow for the development of one or more dwelling units in small-scale structures on lots in urban villages. RSL allows for a broader range of housing types through new development and conversion of existing single-family houses into multiple dwelling units. Allowed housing types include detached dwelling units, apartments, carriage houses, cottage housing developments, rowhouse developments, and townhouse developments. Each principal unit may have one attached or detached ADU. Lots can have attached or stacked principal dwelling units, which is not allowed in NR zones.
Lowrise Multifamily LR1, LR2, and LR3	Lowrise 1 (LR1): Areas characterized by low-density, small-scale multi-family housing types similar in character to single family zones. Most appropriate outside of Growth Areas.[1] Lowrise 2 (LR2): Areas characterized by multifamily housing types in existing small-scale multi-family neighborhoods with arterial streets. Most appropriate within Growth Areas.[1] Lowrise 3 (LR3): Areas characterized by multifamily housing types in existing moderate-scale neighborhoods with good transit service along arterial street and near commercial zones. Most appropriate within Growth Areas.[1] ADUs are allowed with single-family dwelling units, rowhouses, and townhouses in LR zones, subject to specific development standards per 23.45.545.I. ADUs do not count towards the density limit.
Midrise Multifamily MR	Areas that allow denser housing up to eight stories in urban villages and urban centers. Development standards for midrise multifamily zones emphasize residential character and allow for scale and building types that differ from those in less intensive residential areas to accommodate a greater density of development to support nearby businesses. Street-level commercial uses are allowed in midrise zones to allow residents greater access to services and to promote an active street environment without detracting from the overall residential character desired for high-density neighborhoods.
Highrise Multifamily HR	Highrise multifamily zoning designations apply only in urban centers, where the mix of activities offers convenient access to regional transit and to a full range of residential services and amenities, as well as to jobs. Street-level commercial uses are allowed in

Zoning Designation	Description
	highrise neighborhoods to allow residents greater access to services and to promote an active street environment without detracting from the overall residential character desired for high-density neighborhoods.
Seattle Mixed SM	The Seattle Mixed zone provides for a wide range of uses to encourage mixed-use neighborhoods.
Neighborhood Commercial NC1, NC2, and NC3	Neighborhood Commercial 1 (NC1): Small-scale shopping areas that provide convenience retail sales and services to the surrounding residential neighborhood. Characterized by an attractive pedestrian environment, small businesses and lot sizes, and limited transit service. Neighborhood Commercial 2 (NC2): Moderately-sized pedestrian-oriented shopping areas that provide a range of goods and services to the surrounding neighborhoods. Compatible uses include housing and offices. Characterized by an attractive pedestrian environment, medium businesses and lot sizes, and moderate transit service. Neighborhood Commercial 3 (NC3): Larger pedestrian-oriented shopping districts that provide a wide range of goods and services to the surrounding neighborhood and a larger community or region. Compatible uses include housing, offices, and business support services. Characterized by intense pedestrian activity, varied business and lot sizes, and good transit service. Pedestrian-Designated Zones (P): The P designation is a suffix applied to NC zones along pedestrian-oriented commercial streets. Areas are characterized by intense pedestrian activity, uninterrupted commercial frontage, many businesses per block, and excellent transit service. Access for pedestrians, bicyclists, and transit is favored over the automobile.
Commercial C1 and C2	Commercial 1 (C1): Auto-oriented commercial areas that provide a range of retail and services to the surrounding neighborhoods and the larger community or region. Characterized by large parcels that favor automobile access over pedestrians and transit. Commercial 2 (C2): Auto-oriented commercial areas that provide a range of non-retail businesses to the larger community or region. Compatible uses include manufacturing and warehousing. Characterized by larger parcels that favor automobile access over pedestrian and transit, which may be adjacent to industrial zones.
Downtown DH1, DH2, DMC, DMR, DOC1, DOC2, and DRC	Downtown Harborfront (DH1 and DH2): Applies to waterfront lots and adjacent harbor areas within the Urban Harborfront Shoreline Environment or partially within a shoreline environment. Allowed uses include economically viable marines uses that meet the needs of waterborne commerce and opportunities for public access and recreation. Downtown Mixed Commercial (DMC): Areas adjacent to the office core, office expansions areas, and retail core that provide a transition in the level of activity and scale of development. Permitted uses include office and commercial (though at a lower density than the DOC areas) and housing and other uses generating activity without substantially contributing to peak-hour traffic. The DMC encourages a diversity of development compatible with adjacent areas through a range of height limits. Downtown Mixed Residential (DMR): Areas outside special review districts identified for development of a predominantly residential community. Nonresidential uses are allowed that reinforce but don't detract from the primary function of the area. Multiple height, mix of use, and density classifications are allowed to promote a diversity and harmony with existing development.

Zoning Designation	Description
	Downtown Office Core (DOC1 and DOC2): The most concentrated areas of office activity and areas adjacent to those core office areas where a transition to mixed-use areas is desired. These areas are intended to accommodate a large share of Downtown's future employment growth in addition to other complementary uses (such as housing, retail, hotels, and cultural and entertainment facilities). Downtown Retail Core (DRC): Area containing the major department stores and with the greatest concentration of Downtown's retail activity. This area should be the principal center of shopping for both Downtown and the region. Other uses are allowed provided they augment but do not detract from this primary function.
Pike Market Mixed PMM	The PMM zone applies to Pike Place Market, recognizes and preserve the unique character, scale, and function of the Market and its surroundings, and allows development of a compatible mix of uses.
Pioneer Square Mixed PSM	Applies to areas within the Pioneer Square Preservation District (see also Special Review Districts in **App Exhibit G.1-2**). The PSM zone recognizes the historic nature of the area and encourages mixed-use development compatible in use and scale with existing development in Pioneer Square.
International District Mixed and Residential IDM and IDR	Applies to areas within the International Special Review District (see also Special Review Districts in **App Exhibit G.1-2**). The IDM zone applies to areas of the Special Review District identified for mixed-use development, recognizes the area's unique social character, mix of use, and urban design character, and encourages a wide range of uses, housing above the street-level, and the rehabilitation of existing buildings. The IDR zone applies to areas of the Special Review District identified for residential development and maintains the areas primarily for residential use with compatible supporting uses.
Industrial MML, II, UI, IC	Maritime Manufacturing and Logistics (MML): The MML zone is intended to provide long term predictability to landowners, business owners and investors that the area will remain an industrial area. Industry and Innovation (II): The purpose of the II zone is to create a transit-oriented area characterized by modern industrial buildings that supports a mix of economic innovation and emerging industries, and commercial development with high employment density. Urban Industrial (UI): The purpose of the Urban Industrial (UI) zone is to foster vibrant districts that support a mix of local manufacturing, production, arts, and a sense of place. Industrial Commercial (IC): The purpose of the Industrial Commercial zone is to promote development of businesses which incorporate a mix of industrial and commercial activities including light manufacturing and research and development while accommodating a wide range of other employment activities.

1 Growth Areas include urban centers, urban villages, and station area overlay districts.
Sources: Seattle 2035, as amended through 2021; SMC Title 23, 2022; Seattle Industrial and Maritime Strategy Final EIS, 2022; BERK, 2023.

App Exhibit G.1-2. Overlay Districts

District	Purpose
Shoreline Districts	The Shoreline District, or Shoreline Master Program, regulates development of the shorelines in Seattle to protect the ecosystems of the shoreline areas, encourage water-dependent uses; provide for maximum public use and enjoyment of the shorelines of the city, and preserve, enhance, and increase views of the water and access to the water.
Station Area Overlay District	The Station Area Overlay District regulates land use and development in a manner that supports transit-oriented development near light rail stations.
Airport Height Overlay District	The purpose of the Airport Height Overlay District is to ensure safe and unobstructed takeoff and landing approach paths to King County International Airport (Boeing Field).
Special Review Districts	Council can establish by ordinance special review districts that may include use and development standards to control development. Two special review districts—the Pioneer Square Preservation District and the International Special Review District—are currently designated.
Southeast Seattle Reinvestment Area	The intent of this area is to promote community revitalization and investment, and to encourage development which supports business activity and provides employment opportunities and needed services to the residents of Southeast Seattle.
Major Institution Overlay District	Major Institution Overlay Districts regulate Seattle's major educational and medical institutions in a way that balances the needs of the institution with the needs of adjacent communities and neighborhoods. Unique zoning rules are developed for each major institution through the adoption of a Major Institution Master Plan (MIMP) that identifies a boundary (MIOD) within which the revised rules apply and identifies the specific rules that will apply to development within this boundary. MIMPs and corresponding MIODs have been established for thirteen major medical and educational institutions in Seattle.
Northgate Overlay District	The purpose of this district is to create an environment in the Northgate Area that is more amenable to pedestrians and supportive of commercial development, protect the residential character of residential neighborhoods, and support the use of Northgate as a regional high-capacity transportation center.
Sand Point Overlay District	The purpose of this district is to integrate Sand Point into the city as a multi-purpose regional center that provides expanded opportunity for recreation, education, arts, cultural and community activities; increased public access to the shoreline and enhanced open space and natural areas; opportunities for affordable housing and community and social services with a special priority for addressing the needs of homeless families; and expanded opportunity for low-impact economic development uses which could provide employment and services for residents of the property and for the broader community.
Pike/Pine Conservation Overlay District	The Pike/Pine Overlay District is intended to preserve and enhance the balance of residential and commercial uses in the area by encouraging residential development and development that combines residential and non-residential uses, while also providing additional opportunities for commercial development to balance the substantial amount of residential development. The overlay is also intended to promote the conservation of Pike/Pine's existing historic character by limiting new development to a scale that is compatible with the established development pattern, accommodating arts facilities and small businesses at street level, and encouraging the retention of the existing structures and their architectural features that establish the District's architectural character.
Stadium Transition Area Overlay District	The STAOD centers on large sports facilities and allows uses complementary to them. It is intended to contribute to a safer pedestrian environment for those attending events and permits a mix of uses, supporting the pedestrian-oriented character of the area as well as the surrounding industrial zone, while minimizing conflicts with industrial uses. Use

District	Purpose
STAOD	provisions and development standards are designed to create a pedestrian connection with downtown; discourage encroachment on nearby industrial uses to the south; and create a pedestrian-friendly streetscape. Allowing a mix of uses, including office development, is intended to encourage redevelopment and to maintain the health and vibrancy of the area during times when the sports facilities are not in operation.
Master Planned Communities MPC	An MPC zone designation is intended to support highly coordinated infill development with a higher level of environmental sustainability, affordable housing, and publicly accessible open space than is typically provided through conventional lot-by-lot development by allowing greater flexibility in the application of zoning and development requirements

Sources: SMC Title 23, 2022; BERK, 2023.

App Exhibit G.1-3. Future Land Use Designations—Acres Citywide and by EIS Analysis Area

Future Land Use Designation	EIS Analysis Area								Citywide
	1	2	3	4	5	6	7	8	
Urban Center	1 ac. (0.0%)	1,148 ac. (10.5%)	334 ac. (5.0%)	1,346 ac. (74.8%)	895 ac. (17.4%)	—	3 ac. (0.0%)	—	**3,726 ac. (6.4%)**
Hub Urban Village	1,080 ac. (10.4%)	138 ac. (1.3%)	—	—	—	269 ac. (2.9%)	—	447 ac. (5.4%)	**1,934 ac. (3.3%)**
Residential Urban Village	1,042 ac. (10.0%)	170 ac. (1.6%)	53 ac. (0.8%)	260 ac. (14.4%)	697 ac. (13.5%)	474 ac. (5.1%)	254 ac. (4.4%)	1,414 ac. (17.2%)	**4,362 ac. (7.5%)**
Manufacturing Industrial Center	1 ac. (0.0%)	—	1,243 ac. (18.7%)	1 ac. (0.1%)	—	2 ac. (0.0%)	5,130 ac. (91.5%)	—	**6,426 ac. (11.1%)**
Neighborhood Residential Areas	6,095 ac. (58.7%)	7,433 ac. (68.3%)	3,135 ac. (47.1%)	7 ac. (0.4%)	2,493 ac. (48.4%)	5,844 ac. (63.3%)	36 ac. (0.6%)	4,768 ac. (58.0%)	**29,810 ac. (51.5%)**
Multi-Family Residential Areas	456 ac. (4.4%)	423 ac. (3.9%)	579 ac. (8.7%)	49 ac. (2.7%)	358 ac. (6.9%)	859 ac. (9.3%)	26 ac. (0.5%)	194 ac. (2.4%)	**2,945 ac. (5.1%)**
Commercial / Mixed Use Areas	510 ac. (4.9%)	292 ac. (2.7%)	325 ac. (4.9%)	84 ac. (4.7%)	68 ac. (1.3%)	321 ac. (3.5%)	101 ac. (1.8%)	147 ac. (1.8%)	**1,849 ac. (3.2%)**
Industrial Areas	—	—	10 ac. (0.2%)	—	—	—	—	18 ac. (0.2%)	**10 ac. (0.0%)**
Major Institutions	75 ac. (0.7%)	396 ac. (3.6%)	66 ac. (1.0%)	—	18 ac. (0.3%)	92 ac. (1.0%)	—	37 ac. (0.4%)	**683 ac. (1.2%)**
Cemetery	156 ac. (1.5%)	46 ac. (0.4%)	28 ac. (0.4%)	—	38 ac. (0.7%)	15 ac. (0.2%)	—	—	**284 ac. (0.5%)**
City-Owned Open Space	964 ac. (9.3%)	834 ac. (7.7%)	876 ac. (13.2%)	51 ac. (2.8%)	588 ac. (11.4%)	1,352 ac. (14.6%)	55 ac. (1.0%)	1,207 ac. (14.7%)	**5,927 ac. (10.2%)**
Total Acres & Percent of Citywide Total	**10,381 ac. (18%)**	**10,879 ac. (19%)**	**6,649 ac. (11%)**	**1,799 ac. (3%)**	**5,154 ac. (9%)**	**9,228 ac. (16%)**	**5,606 ac. (10%)**	**8,214 ac. (14%)**	**57,908 ac. (100%)**

Sources: City of Seattle, October 2023; BERK, 2023.

App Exhibit G.1-4. Generalized Zoning—Acres Citywide and by EIS Analysis Area

Generalized Zoning	EIS Analysis Area 1	2	3	4	5	6	7	8	Citywide
Neighborhood Residential	7,079 ac. (68.2%)	8,294 ac. (76.1%)	3,963 ac. (59.6%)	25 ac. (1.4%)	3,048 ac. (59.1%)	7,032 ac. (76.2%)	37 ac. (0.7%)	5,885 ac. (71.6%)	**35,364 ac. (61.0%)**
Residential Small Lot	222 ac. (2.1%)	32 ac. (0.3%)	—	—	154 ac. (3.0%)	202 ac. (2.2%)	209 ac. (3.7%)	542 ac. (6.6%)	**1,361 ac. (2.3%)**
Lowrise Multifamily	1,435 ac. (13.8%)	717 ac. (6.6%)	602 ac. (9.1%)	141 ac. (7.8%)	954 ac. (18.5%)	1,094 ac. (11.9%)	55 ac. (1.0%)	1,031 ac. (12.6%)	**6,030 ac. (10.4%)**
Midrise Multifamily	38 ac. (0.4%)	133 ac. (1.2%)	51 ac. (0.8%)	27 ac. (1.5%)	184 ac. (3.6%)	198 ac. (2.1%)	—	24 ac. (0.3%)	**655 ac. (1.1%)**
Highrise Multifamily	—	—	—	—	96 ac. (1.9%)	—	—	—	**96 ac. (0.2%)**
Seattle Mixed	—	125 ac. (1.1%)	281 ac. (4.2%)	304 ac. (16.9%)	—	—	—	76 ac. (0.9%)	**785 ac. (1.4%)**
Neighborhood Commercial	708 ac. (6.8%)	676 ac. (6.2%)	97 ac. (1.5%)	50 ac. (2.8%)	483 ac. (9.4%)	411 ac. (4.4%)	70 ac. (1.2%)	477 ac. (5.8%)	**2,971 ac. (5.1%)**
Commercial	596 ac. (5.7%)	97 ac. (0.9%)	250 ac. (3.8%)	188 ac. (10.5%)	19 ac. (0.4%)	199 ac. (2.2%)	69 ac. (1.2%)	144 ac. (1.7%)	**1,561 ac. (2.7%)**
Downtown	—	—	—	739 ac. (41.1%)	—	—	—	—	**739 ac. (1.3%)**
Pike Market	—	—	—	25 ac. (1.4%)	—	—	—	—	**25 ac. (0.0%)**
Pioneer Square	—	—	—	102 ac. (5.7%)	—	—	3 ac. (0.0%)	—	**105 ac. (0.2%)**
International District	—	—	—	102 ac. (5.7%)	—	—	—	—	**103 ac. (0.2%)**
Industrial	217 ac. (2.1%)	13 ac. (0.1%)	1,338 ac. (20.1%)	93 ac. (5.2%)	5 ac. (0.1%)	2 ac. (0.0%)	5,171 ac. (92.1%)	—	**6,838 ac. (11.8%)**
Major Institution Overlay	85 ac. (0.8%)	809 ac. (7.4%)	66 ac. (1.0%)	—	171 ac. (3.3%)	92 ac. (1.0%)	—	37 ac. (0.4%)	**1,259 ac. (2.2%)**
Master Planned Community	—	—	—	3 ac. (0.2%)	40 ac. (0.8%)	—	—	—	**43 ac. (0.1%)**
Total Acres & Percent of Citywide Total	**10,379 ac. (18%)**	**10,896 ac. (19%)**	**6,649 ac. (11%)**	**1,799 ac. (3%)**	**5,153 ac. (9%)**	**9,229 ac. (16%)**	**5,613 ac. (10%)**	**8,217 ac. (14%)**	**57,934 ac. (100%)**

Sources: City of Seattle, October 2023; BERK, 2023.

App Exhibit G.1-5. Shoreline Environment Designations—Acres Citywide and by EIS Analysis Area

Shoreline Designation	EIS Analysis Area 1	2	3	4	5	6	7	8	Citywide
Conservancy Management	339 ac. (32.4%)	80 ac. (10.5%)	168 ac. (9.5%)	5 ac. (1.2%)	61 ac. (11.9%)	44 ac. (4.0%)	1 ac. (0.1%)	57 ac. (8.4%)	754 ac. (10.1%)
Conservancy Navigation	82 ac. (7.9%)	3 ac. (0.4%)	140 ac. (7.9%)	3 ac. (0.9%)	2 ac. (0.4%)	0.2 ac. (0.0%)	0.2 ac. (0.0%)	2 ac. (0.4%)	234 ac. (3.1%)
Conservancy Preservation	150 ac. (14.3%)	199 ac. (26.1%)	615 ac. (34.7%)	—	160 ac. (31.2%)	337 ac. (30.6%)	58 ac. (4.9%)	112 ac. (16.5%)	1,632 ac. (21.9%)
Conservancy Recreation	132 ac. (12.7%)	293 ac. (38.5%)	336 ac. (19.0%)	6 ac. (1.5%)	164 ac. (31.9%)	548 ac. (49.7%)	12 ac. (1.0%)	402 ac. (59.3%)	1,894 ac. (25.4%)
Conservancy Waterway	13 ac. (1.3%)	1 ac. (0.1%)	—	22 ac. (5.7%)	—	—	—	—	36 ac. (0.5%)
Urban Commercial	182 ac. (17.4%)	32 ac. (4.1%)	—	160 ac. (41.0%)	3 ac. (0.6%)	11 ac. (1.0%)	—	8 ac. (1.1%)	395 ac. (5.3%)
Urban General	20 ac. (1.9%)	—	21 ac. (1.2%)	0.3 ac. (0.1%)	—	—	4 ac. (0.3%)	—	44 ac. (0.6%)
Urban Harborfront	—	—	—	130 ac. (33.3%)	—	—	—	—	130 ac. (1.7%)
Urban Maritime	56 ac. (5.3%)	3 ac. (0.4%)	97 ac. (5.5%)	35 ac. (9.0%)	—	—	—	—	191 ac. (2.6%)
Urban Residential	70 ac. (6.7%)	151 ac. (19.8%)	86 ac. (4.8%)	28 ac. (7.3%)	123 ac. (23.9%)	162 ac. (14.7%)	—	97 ac. (14.3%)	716 ac. (9.6%)
Urban Industrial	2 ac. (0.2%)	—	309 ac. (17.4%)	0.2 ac. (0.1%)	—	0.1 ac. (0.0%)	1,110 ac. (93.7%)	—	1,421 ac. (19.1%)
Total Acres & Percent of Citywide Total	**1,045 ac. (14%)**	**761 ac. (10%)**	**1,772 ac. (24%)**	**390 ac. (5%)**	**513 ac. (7%)**	**1,102 ac. (15%)**	**1,185 ac. (16%)**	**678 ac. (9%)**	**7,447 ac. (100%)**

Sources: City of Seattle, 2022; BERK, 2023.

App Exhibit G.1-6. Current Land Use—Acres Citywide and by EIS Analysis Area

Current Use Category	EIS Analysis Area 1	2	3	4	5	6	7	8	Citywide
Commercial / Mixed-Use	653 ac. (9.1%)	537 ac. (6.6%)	536 ac. (13.1%)	642 ac. (62.1%)	260 ac. (7.8%)	214 ac. (3.3%)	296 ac. (7.3%)	222 ac. (3.9%)	**3,360 ac. (8.4%)**
Industrial	107 ac. (1.5%)	33 ac. (0.4%)	203 ac. (5.0%)	35 ac. (3.4%)	15 ac. (0.4%)	22 ac. (0.3%)	1,513 ac. (37.3%)	78 ac. (1.4%)	**2,007 ac. (5.0%)**
Multi-Family	842 ac. (11.8%)	570 ac. (7.0%)	389 ac. (9.5%)	154 ac. (14.9%)	615 ac. (18.4%)	482 ac. (7.5%)	37 ac. (0.9%)	394 ac. (7.0%)	**3,483 ac. (8.7%)**
Single Family	4,099 ac. (57.3%)	4,736 ac. (58.6%)	1,440 ac. (35.3%)	33 ac. (3.2%)	1,515 ac. (45.5%)	3,788 ac. (59.1%)	148 ac. (3.7%)	3,247 ac. (57.4%)	**19,005 ac. (47.7%)**
Major Institution & Public Facilities / Utilities	338 ac. (4.7%)	1,025 ac. (12.7%)	500 ac. (12.3%)	89 ac. (8.6%)	217 ac. (6.5%)	298 ac. (4.6%)	1,436 ac. (35.4%)	335 ac. (5.9%)	**4,240 ac. (10.7%)**
Parks / Open Space / Cemeteries	765 ac. (10.7%)	1,016 ac. (12.6%)	827 ac. (20.3%)	42 ac. (4.1%)	604 ac. (18.1%)	1,206 ac. (18.8%)	51 ac. (1.2%)	960 ac. (17.0%)	**5,471 ac. (13.7%)**
Vacant	324 ac. (4.5%)	145 ac. (1.8%)	172 ac. (4.2%)	36 ac. (3.5%)	88 ac. (2.6%)	368 ac. (5.7%)	559 ac. (13.8%)	401 ac. (7.1%)	**2,094 ac. (5.3%)**
Easement / Unclassified	22 ac. (0.3%)	25 ac. (0.3%)	8 ac. (0.2%)	3 ac. (0.3%)	17 ac. (0.5%)	32 ac. (0.5%)	16 ac. (0.4%)	19 ac. (0.3%)	**143 ac. (0.4%)**
Total Acres & Percent of Citywide Total	**7,151 ac. (18%)**	**8,087 ac. (20%)**	**4,075 ac. (10%)**	**1,033 ac. (3%)**	**3,332 ac. (8%)**	**6,411 ac. (16%)**	**4,056 ac. (10%)**	**5,656 ac. (14%)**	**39,802 ac. (100%)**

Sources: City of Seattle, 2022; BERK, 2023.

Updating Seattle's Neighborhood Residential zoning

A proposal to increase housing choice and fulfill requirements of House Bill 1110

UPDATED OCTOBER 2024

City of Seattle MAKERS architecture • planning • urban design

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Introduction

Purpose

This report describes a revised proposal for updating Seattle's Neighborhood Residential zoning, including visualizations of potential outcomes. Neighborhood Residential currently represents Seattle's lowest-density residential zoning and consists primarily of detached homes. We published an initial proposal in March 2024. **This revised proposal includes changes that respond to feedback received during public engagement in March through May 2024.**

New Neighborhood Residential zoning is one part of the City's effort to update our Comprehensive Plan, which guides how our city grows and makes investments. The Plan guides City decisions about where we allow new housing and the forms it can take in different areas of the city. Our updated Plan, called the One Comprehensive Seattle Plan, seeks to address challenges new and old: racial disparities, rising housing costs, access to economic opportunity and education, climate change, and more. Addressing these issues requires identifying ways to increase the supply, diversity, and affordability of housing and ensuring all neighborhoods are accessible to households with a diverse range of incomes and housing needs. Updating our Neighborhood Residential zoning, which governs the amount and types of housing allowed in the majority of Seattle, is one necessary step towards realizing this vision.

Updates to Neighborhood Residential zoning are also required under new state law. Passed in 2023, House Bill 1110 (HB 1110) requires cities across the state to allow a greater quantity and variety of housing in areas currently reserved for detached homes.

Updating Seattle's Neighborhood Residential zoning

New state legislation on housing

In 2023, the Washington State Legislature adopted House Bill 1110 (HB 1110), often referred to as the Middle Housing Bill. HB 1110 requires cities in Washington to allow **middle housing** throughout residential areas and limits how cities can regulate this housing. The bill defines middle housing as "buildings that are compatible in scale, form, and character with single-family houses and contains two or more attached, stacked, or clustered homes including duplexes, triplexes, fourplexes, fiveplexes, sixplexes, townhouses, stacked flats, courtyard apartments, and cottage housing."

In Seattle, the bill requires zoning that allows:

- At least four units on all residential lots
- At least six units on residential lots within a quarter mile of major transit stops (such as light rail and bus rapid transit)
- At least six units on residential lots if two units are income-restricted affordable housing

The concepts described in this document are intended to comply with the requirements of HB 1110.

Example middle housing types: eight-unit courtyard housing (left) and fourplex (right)

Zoning changes to implement HB 1110

The proposal for updated Neighborhood Residential zoning increases the number of homes allowed per lot to expand housing choices and comply with state law, while generally retaining the number of stories allowed today.

The proposed standards would vary from existing requirements in several other key ways:

- The Floor Area Ratio (FAR), which regulate the scale of development, would increase for developments maximizing density from around 1.0 to 1.2.
- Lot coverage would increase to 50 percent, compared to 35-40 percent for most lots today.
- Front and rear setbacks would be reduced to allow a wider range of layouts and more usable open spaces for residents in the interior of a site. We would encourage porches by allowing them in the front setback.
- Unit lot subdivision would be allowed, as required by new state law. This would allow straightforward fee simple sale and ownership of homes, compared to the more complex condominium arrangements used currently when multiple homes are built and sold on one site.
- New open space requirements would result in more usable open space for residents.

Examples of potential development that could occur under these proposed rules are shown at the end of this document.

Base standards in updated Neighborhood Residential zones
Alternative standards for stacked flats and affordable housing are shown on the following pages.

Maximum density	1 unit per 1,250 square feet of lot area except that, consistent with state law, at least four units are allowed on all lots, regardless of lot size, and six units within a quarter-mile walk of major transit or if two units are affordable
Floor area ratio (FAR)	The amount of floor area allowed is equal to the lot size times the FAR. Proposed FARs are: • 0.6 FAR for density below 1/4,000 sq ft (e.g., one unit on a 5,000 sq ft lot) • 0.8 FAR for density between 1/4,000 and 1/2,200 sq ft (e.g., two units on a 5,000 sq ft lot) • 1.0 FAR for density between 1/2,200 and 1/1,600 sq ft (e.g., three units on a 5,000 sq ft lot) • 1.2 FAR for density of at least 1/1,600 sq ft (e.g., four units on a 5,000 sq ft lot)
Lot coverage	50 percent
Height limit	• 3 stories for market-rate development • 4 stories for development with income-restricted affordable homes
Minimum open space requirement	• 20 percent of lot area • The minimum dimension for usable open space is 8 feet or, if the open space includes a circulation pathway serving multiple buildings, 11 feet • Open space may be private or shared • At least half of the open space must be at ground level. Only half of open space not at ground level counts toward this requirement.
Minimum setbacks and separations	• Front: 10 feet • Rear: 10 feet without an alley, 5 feet for ADUs, and zero feet with an alley • Side: 5 feet • Separation between buildings within property: 6 feet • Covered porches may extend up to 6 feet into setback, with up to 100 sq ft per porch allowed in setback • Bay windows and balconies may extend up to 2 feet into setback if limited to 8 feet in width
Accessory dwelling units	Accessory dwelling units (ADUs) would count toward the density and floor area limits shown above and be subject to the same standards as principal dwelling units except for a maximum size limit of 1,000 square feet.

Affordable housing bonus

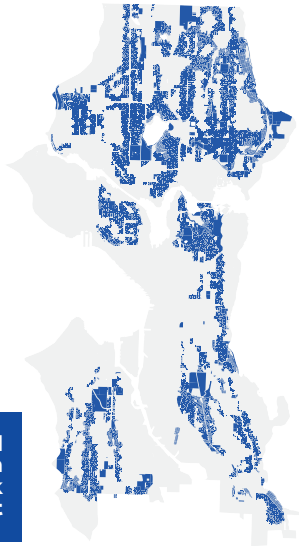
Neighborhood Residential zones are some of the most expensive and exclusive areas of Seattle. The updated Neighborhood Residential zones would help address this pattern by increasing housing supply overall and allowing smaller housing types in particular. But most new market-rate housing in these areas will likely remain unaffordable to low-income households due to factors like the high cost of development. Achieving more racial and economic inclusion in Neighborhood Residential areas — a central objective of the One Seattle Plan — requires proactive policies that encourage creation of housing affordable to low-income people in these neighborhoods.

One way to support this goal is with development standards that increase the feasibility of low-income housing. Today, restrictive zoning limits its feasibility in Neighborhood Residential areas. Under House Bill 1110, cities like Seattle must allow six units per lot if at least two are affordable to low-income households. The proposed Neighborhood Residential zones would also allow additional height, floor area, and density on sites within a quarter-mile of frequent transit that provide more income-restricted homes.

Most low-income housing created with these provisions would likely be permanently affordable homeownership developments, as it is difficult to do affordable rental housing at this small scale. Recent examples of permanently affordable homeownership projects in Seattle include cottage-style development in RSL zones and stacked affordable condos in Capitol Hill.

Affordable housing development would be subject to all standards for NR zones with the following exceptions:

Maximum height	4 stories
Maximum lot coverage	60 percent
Maximum density	1 unit per 400 square feet of lot area
Floor area ratio (FAR)	1.8
Affordability requirement	At least half of units must be price- and income-restricted so they are affordable to households making 60% of area median income (AMI) for rental units or 80% of AMI for ownership units



Neighborhood Residential sites within a quarter-mile walk of frequent transit

Ballard Flats
Architecture and photography credit: BUILD LLC

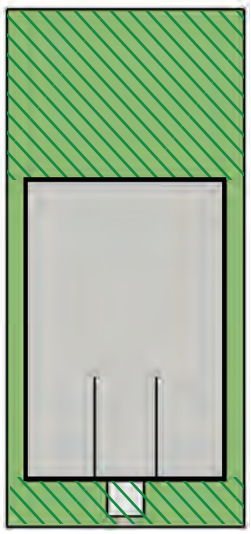
AFFORDABLE HOUSING WITH BONUS

A small building with flats affordable to low-income households. Homes would likely be owned as permanently affordable condominium units. A single stair provides access to each floor.

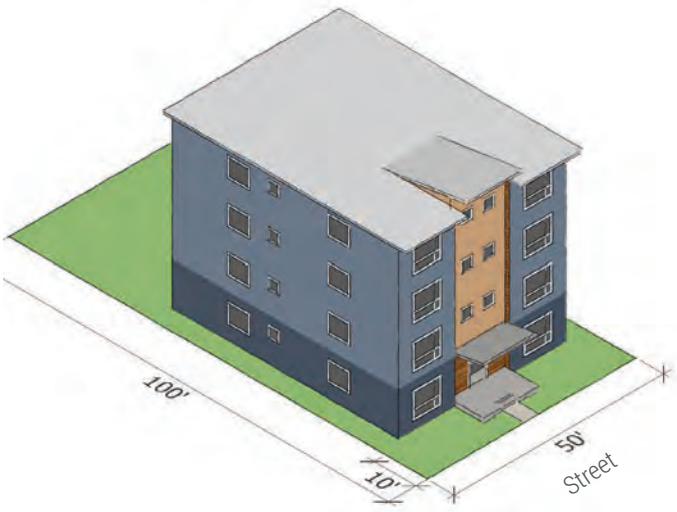
Street-level view

Existing precedent

Total units	8
Floor area ratio (FAR)	1.8
Average unit size	1,125
Stories	4
Lot size	5,000
Building coverage	45%
Usable open space	44%
Building plus paving	47%
Parking spaces	0



Street



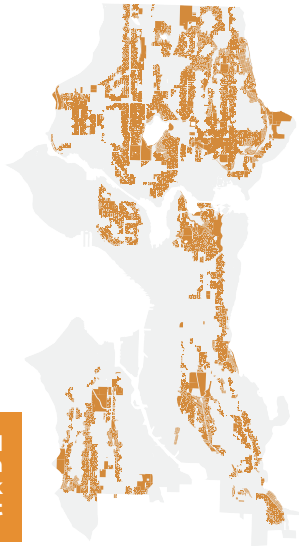
Stacked flat bonus

Stacked flats are a housing type where each unit is on one level. They can be offered as apartments for rent or created as condominiums sold to homebuyers.

During public engagement in spring 2024, we heard many comments that the City should do more to support the development of stacked flats, especially on quieter streets where rental housing and lower-cost ownership options tend to be scarce. Comments focused on the benefits of stacked flats in allowing residents to live on one floor. This type of housing can be especially helpful for older adults wishing to stay in place and for people who require accessible units. Stacked housing also supports the creation of lower-cost homes. Consequently, we are proposing to allow additional floor area and density for stacked flats in certain circumstances to encourage this type of development.

Stacked flats on lots of at least 6,000 square feet located within a quarter-mile of frequent transit would be subject to all standards for NR zones with the following exceptions:

Floor area ratio (FAR)	1.8
Maximum density	1 unit per 650 square feet of lot area



Neighborhood Residential sites within a quarter-mile walk of frequent transit

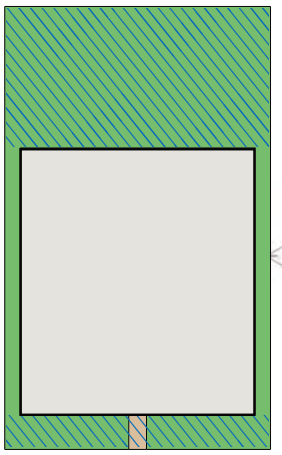
STACKED FLATS WITH BONUS

Nine-unit apartment or condo building using the stacked flat bonus to achieve additional floor area and provide more homes.

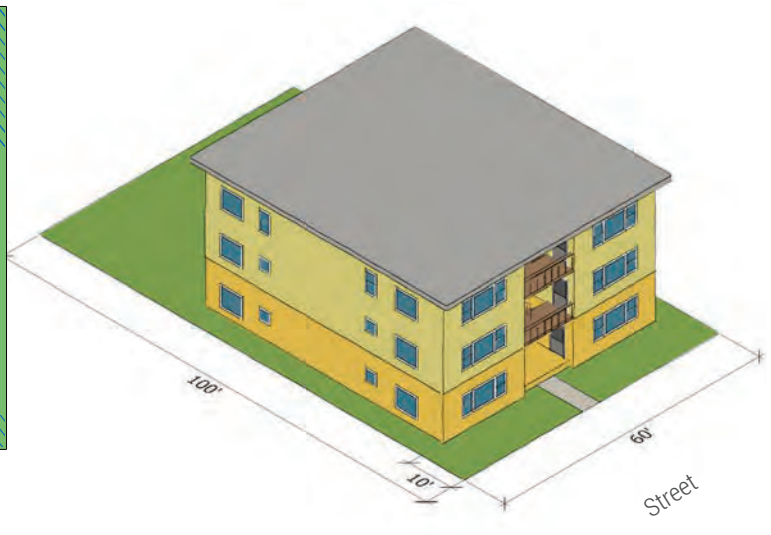
Street-level view

Existing precedent

Total units	9
Floor area ratio (FAR)	1.4
Average unit size	933
Stories	3
Lot size	6,000
Building coverage	47%
Usable open space	42%
Building plus paving	51%
Parking spaces	0



Street



Corner stores

One goal of the One Seattle Plan is to create neighborhoods where people can walk and bike to everyday needs. Corner stores help to achieve this goal by providing services and retail in primarily residential areas that may be far from larger business districts. Allowing small commercial uses in residential zones also allows entrepreneurs to start small businesses that contribute to neighborhood vibrancy and cohesion. Relics of the era when small corner stores were ubiquitous exist throughout Seattle's residential areas, though most have since been converted to residential uses due to changes in zoning intended to create more separation of uses.

We propose to allow limited commercial uses, such as retail and food and beverage services, on corner lots in Neighborhood Residential zones. Commercial uses would be limited to the ground floor and basements, although ancillary uses such as storage and office spaces could be allowed on the upper floors. Rules would apply regarding hours of operation, delivery, noise, odor, and the location and screening of solid waste and other outdoor activities. No parking would be required for corner stores since commercial uses in residential areas less than 2,500 square feet in size are already exempt from parking requirements.

New corner stores would most likely result through conversion of existing residential structures, including reestablishing commercial uses in structures previously used as a business. Depending on the size and layout of the structure, residential uses could be maintained on site. For example, an existing two-story structure could be converted into a small corner store with storage and offices on the second floor, or the second story could remain in residential use for the operator's home or as a rental unit. Alternatively, a garage in the front of a unit could be converted into a commercial use such as a cafe — common in Seattle's Residential–Commercial (RC) zones — while maintaining the existing home behind it. Some new development with purpose-built commercial could be built on corners with heavier pedestrian and traffic volumes. However, development of this type would likely occur infrequently due to the high cost of new construction and the relatively lower value of commercial space outside business districts.

Development with commercial uses on corner lots would have to meet all Neighborhood Residential standards with the following exceptions:

Setback and separations	• Reduced setback of two feet from street lot lines for commercial spaces on the ground floor • Upper floors required to set back 10 feet
Height and noise	• Two additional feet of height for the ground floor to allow for taller ceilings and additional soundproofing for residential use above

Credit: Samuel Kraft

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CORNER STORE

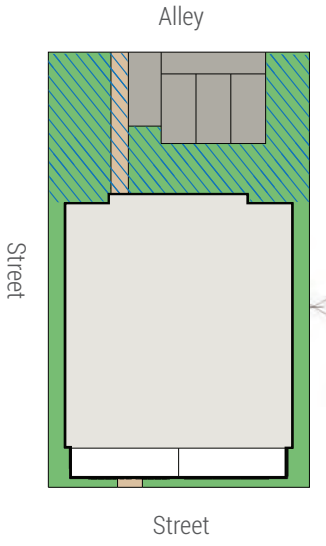
A mixed-use building with ground-floor commercial space that serves the surrounding neighborhood and four homes in the two stories above.

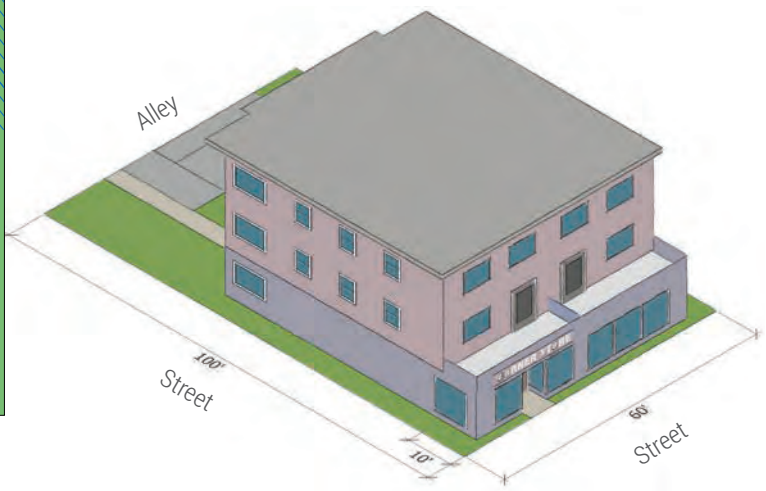
The ground floor would be subject to a reduced setback while the upper floors would still need to meet the 10-foot setback requirement. This type of development would be allowed only on corner lots.

Street-level view

Existing precedent

Total units	4
Floor area ratio (FAR)	1.4
Average unit size	1,325
Commercial size	
Stories	3
Lot size	6,000
Building coverage	50%
Usable open space	25%
Building plus paving	63%
Parking spaces	3





Additional changes to development standards

Off-street parking

Off-street parking requirements can have significant impacts on the design and cost of housing and increase car usage and greenhouse gas emissions. While off-street parking can reduce competition for parking on the street, it also increases the cost of construction; reduces the amount of space available for housing, open space, and trees; increases hardscape and runoff; and encourages vehicle ownership and use. On small lots, driveways, maneuvering areas, and parking stalls can take up a substantial portion of the site and dictate the layout of everything else on the site. In many cases, these areas end up occupying the entire interior of a site, leaving only small areas of open space at the front and rear. However, off-street parking can also support goals like providing space for electric vehicle charging.

Currently, Neighborhood Residential zones require one off-street parking space per principal dwelling unit, unless the lot is smaller than 3,000 square feet, less than 30 feet in width, or located in a Residential Small Lot zone near frequent transit. Given that ADUs do not require parking, Neighborhood Residential zones today effectively require one parking space per three dwelling units.

New state law also prohibits cities from requiring off-street parking within one-half mile walking distance of a stop for light rail, commuter rail, or bus rapid transit for middle housing. In our proposal, no minimum parking requirement would apply for Neighborhood Residential zones within a half-mile of a major transit stop, as required by HB 1110. Elsewhere in Neighborhood Residential, one parking space would be required per two principal dwelling units. The development examples in this document illustrate a range of parking outcomes given these possible scenarios.

Open space

Open space on lots in Neighborhood Residential zones creates space for residents to be outside and for trees and vegetation. Our proposal is a requirement that 20 percent of the lot be set aside as open space. Open space would include areas outside building footprints, driveways, and parking stalls with a width and depth of at least 8 feet or, if they contain a pathway accessing multiple units, 11 feet. Covered porches would count towards open space, but balconies and roof decks would not. Open space may be shared between multiple units or private. At least half of the open space must be at ground level, and only half of open space not at ground level would count toward the requirement.

During past public engagement, many people supported creating more homeownership options that allow for usable green space. This proposed standard aims to ensure a reasonable amount of open space in new developments, while giving homebuilders flexibility in how they integrate it into their designs. To create the development examples in this document, we tested different approaches to open space. The 20 percent requirement was achievable under all scenarios but required careful design in many situations. Each development example in this document includes an open space calculation and identifies where the open space is located on the lot.

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Trees and vegetation

Trees in Neighborhood Residential zones are protected by multiple regulations:

- **The Tree Protection Code** limits the number, size, and type of trees that can be removed from private property and establishes requirements for replacing trees cut down.
- **Tree planting requirements** require planting of trees as part of development.
- **Street tree requirements** limit removal of street trees and require planting of new street trees as part development.
- **Environmentally critical areas (ECA) and Shoreline regulations** protect trees and vegetation around shorelines, creeks, wetlands, and steep slopes.

In May 2023, the tree protection and street tree requirements were updated, lowering size thresholds, strengthening protections, requiring mitigation for trees removed, and requiring street trees as part of development. We propose to update tree planting requirements — the only rules for Neighborhood Residential not updated in May 2023 — to help meet citywide tree canopy goals in the context of new development allowed in these areas. Our proposal applies the tree planting requirements that currently exist only in Residential Small Lot zones to encourage the planting of larger species trees.

Currently, development in NR1, NR2, and NR3 zones requires the planting of two caliper inches of tree — roughly the width of a new tree's trunk — per 1,000 square feet of lot area. On a 5,000-square-foot lot, this requires planting five new two-caliper-inch small or large species trees or transplanting one 10-caliper-inch tree. Absent an incentive to plant larger species trees, developers generally opt for smaller species.

Credit Haeccity Studio Architecture & Sama Jim Canzion

Under the new requirements, a point system would encourage retention of existing trees and the planting of larger species trees and conifers. The number of points required would vary based on the number of homes on a lot. New development with density of 4 homes on a 5,000 square foot lot would need to achieve one point per 750 square feet lot area while a single home on the same lot would have to achieve one point per 500 square feet of lot. A table showing how tree points could be achieved is shown below.

Type of tree	Non-conifer trees	Conifer trees
Small tree planted after construction	1 point	1.25 points
Small/medium tree planted after construction	2 points	2 points
Medium large tree planted after construction	3 points	3.75 points
Large tree planted after construction	4 points	5 points
Tree 6 inches in diameter or greater preserved during construction	1 point per inch of diameter	1.25 points per inch of diameter

ECAs and Shorelines

State law requires that changes to increase housing choice in Neighborhood Residential zones also apply to lots with environmentally critical areas (ECAs) like creeks, wetlands, and steep slopes and those along shorelines. However, cities can reduce the density allowed based on the portion of a lot outside these areas.

To implement this provision, we propose to exclude the following areas when calculating lot size for purpose of density and lot coverage requirements:

- riparian corridors (i.e., the areas around creeks)
- wetlands and their buffers
- submerged lands and areas within the Shoreline District
- designated non-disturbance areas in steep slopes

The intent of this change is to allow development *outside* ECAs, the Shoreline District, and their buffers consistent with development allowed elsewhere — while limiting development *within* ECAs, the Shoreline District, and their buffers. For example, on a 10,000-square-foot lot for which half the lot is in ECAs, shorelines, and their buffers, the lot could contain a density of units and an amount of lot coverage equal to a standard 5,000 square foot lot.

Existing lots would be allowed to have at least one dwelling unit and a lot coverage of at least 600 square feet even if the entire property is within these areas.

Design standards

No design standards apply currently in Neighborhood Residential zones. We propose to implement the following new design standards:

- **Access.** Each unit must have a pedestrian access pathway at least 3 feet in width between the entrance and the street
- **Entries.** Each street-facing facade must have a pedestrian entry with weather protection, such as a covered porch, canopy, recessed entry, or similar feature, measuring at least 3 feet in both width and depth.
- **Windows and doors.** At least 20 percent of the area of each street-facing facade shall consist of windows and/or doors.
- **Materials.** At least 60 percent of the area of each street-facing facade shall consist of windows, doors, or materials that contain breaks every 12-16 inches. This standard aims to add visual interest through texture, details, and shadow lines and reduce the perceived scale and bulk of walls

The proposal encourages better materials, windows facing the street, and welcoming entries...

...and aims to prevent blank or monotous street-facing facades without entries and with few windows.

Other development standards

Maximum height

We propose to increase the height limit from 30 feet to 32 feet to encourage more livable homes and better design outcomes within the existing three-story scale. The current height limit pushes builders to locate the first floor at grade and have minimum separation between floors to achieve reasonable floor to ceiling heights. A higher limit can allow the first floor to be raised above grade to create privacy and separation for residents, provide more acoustic separation between floors, and result in higher floor-to-ceiling heights that let in more light and create better living space.

Pitched roof exemption

Pitched roofs are already allowed to extend up to five feet above the height limit if they meet a minimum pitch of 4:12. We propose to add a height exception for shed roofs (roofs slanted in only one direction) since they support solar panels.

Mandatory Housing Affordability (MHA)

In zones with MHA requirements, development is required to contribute to the creation of affordable housing by reserving a portion of units as rent- and income-restricted affordable units or by paying into a fund to create affordable units off-site. MHA is generally applied in multifamily and commercial zones when a significant increase in development capacity has been provided to offset the cost of the requirements. MHA does not apply in NR zones today, and we do not propose to apply it as part of this update.

2395

Next steps & engagement

We are eager for feedback on this updated proposal, draft legislation to implement the proposal, and maps of proposed rezones during October through December 2024. Comments can be submitted online at zoning.oneseattleplan.com.

We will also host in-person information sessions so community members can talk directly with staff. More information on the Comprehensive Plan Update and events is available at.

After this engagement period, we will transmit legislation to enact the proposed changes to the City Council for their deliberation and adoption. We anticipate that City Council will adopt the final legislation by June 2025.

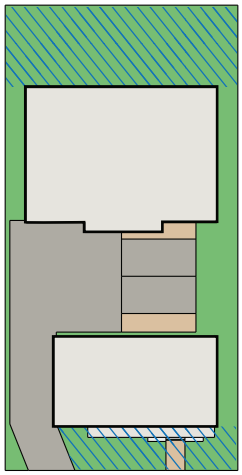
SEMI-ATTACHED HOMES WITH AUTOCOURT

A detached home and a side-by-side duplex, with two surface parking spaces and one garage space accessed from the street.

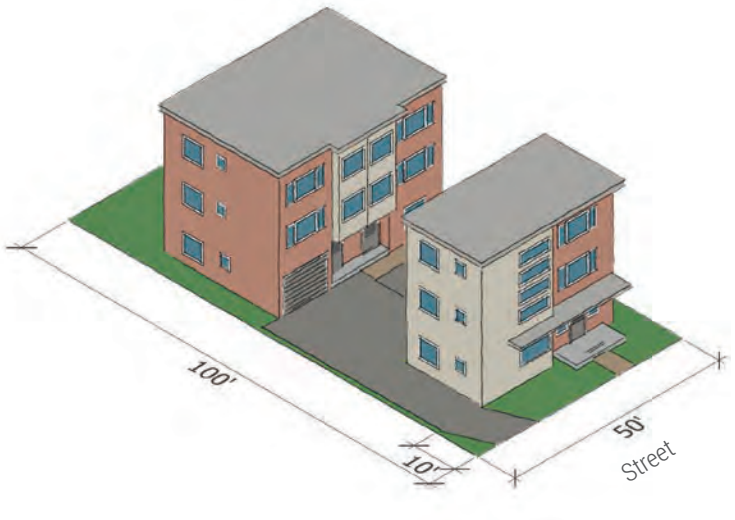
Street-level view

Existing precedent

Total units	3
Floor area ratio (FAR)	1.0
Average unit size	1,667
Stories	3
Lot size	5,000
Building coverage	33%
Usable open space	27%
Building plus paving	59%
Parking spaces	3



Street



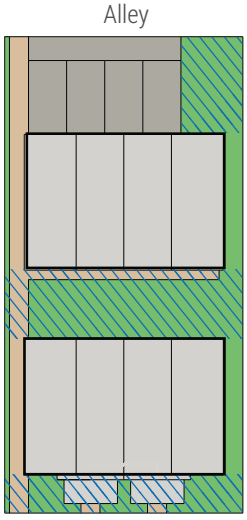
TWO DUPLEXES WITH ALLEY ACCESS

Four homes in two side-by-side duplexes with access to surface parking from an alley.

Street-level view

Existing precedent

Total units	4
Floor area ratio (FAR)	1.2
Average unit size	1,500
Stories	3
Lot size	5,000
Building coverage	40%
Usable open space	33%
Building plus paving	66%
Parking spaces	4



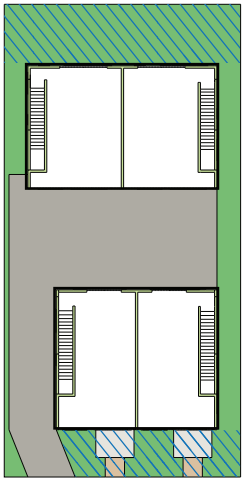
TWO DUPLEXES WITHOUT ALLEY ACCESS

Four homes in two side-by-side duplexes with four parking spaces accessed from the street.

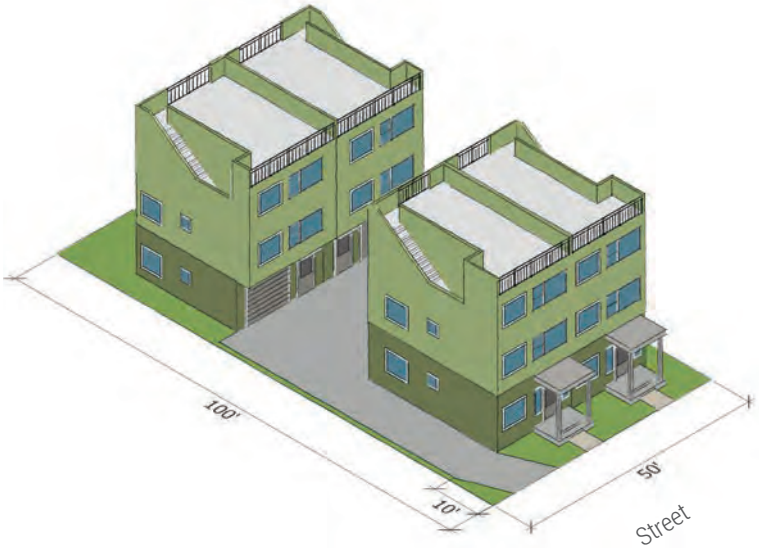
Street-level view

Existing precedent

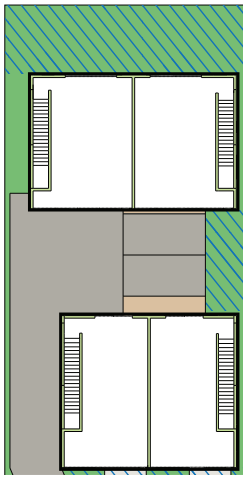
Total units	4
Floor area ratio (FAR)	1.2
Average unit size	1,500
Stories	3
Lot size	5,000
Building coverage	40%
Usable open space	20%
Building plus paving	73%
Parking spaces	4



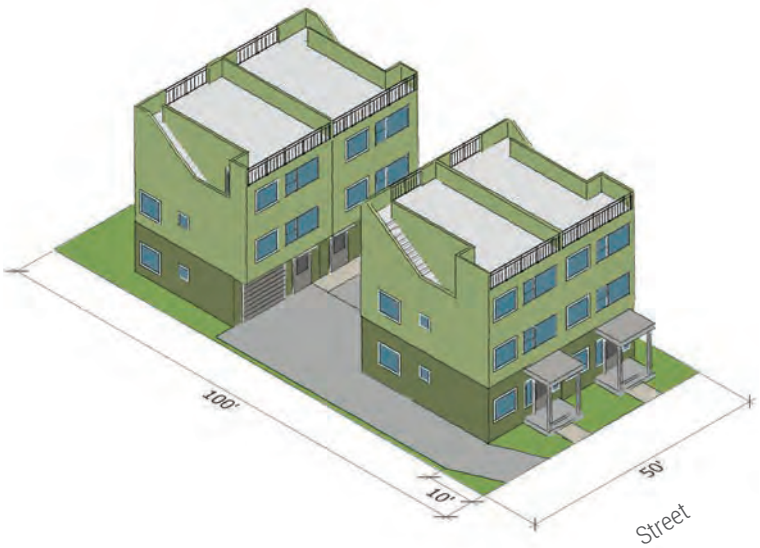
Street



Total units	4
Floor area ratio (FAR)	1.2
Average unit size	1,500
Stories	3
Lot size	5,000
Building coverage	40%
Usable open space	21%
Building plus paving	72%
Parking spaces	4



Street



2399

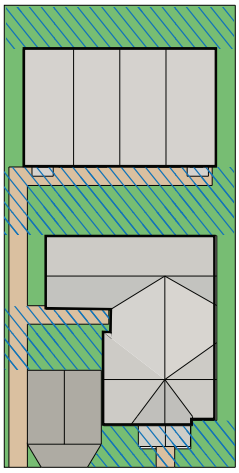
TWO DUPLEXES WITHOUT ALLEY ACCESS

Four homes in two duplexes with two surface parking spaces accessed from the street.

Street-level view

Existing precedent

Total units	4
Floor area ratio (FAR)	1.2
Average unit size	1,500
Stories	3
Lot size	5,000
Building coverage	40%
Usable open space	38%
Building plus paving	58%
Parking spaces	2



Street

TWO DUPLEXES WITHOUT ALLEY ACCESS

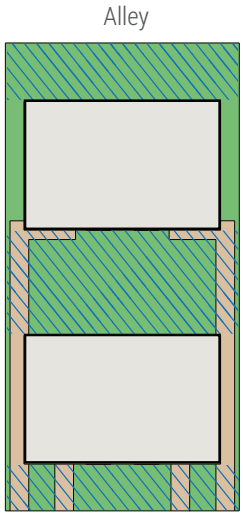
Four homes in two side-by-side duplexes without parking.

Street-level view

Existing precedent

Total units	4
Floor area ratio (FAR)	1.2
Average unit size	1,500
Stories	3
Lot size	5,000
Building coverage	40%
Usable open space	51%
Building plus paving	56%
Parking spaces[1]	0

[1] This scenario with no parking would be possible only on sites within a half-mile of a major transit stop.



NR Tree Planting Analysis

Assumptions

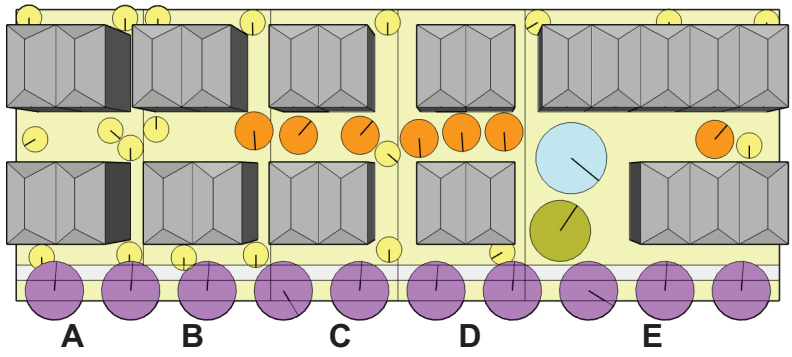
- Tree Size: Use tree canopy sizes developed by SDCI and SDOT arborist for 2016 analysis
    - Mature canopy sizes based on city street tree list
    - Tree canopy at 25 years assumed to be about half the area of mature canopy
- Number of Street trees: Use results of analysis of 11 RSL plan set which found that street trees occurred on average
    - Every 25 feet for properties without driveways
    - Every 33 feet for properties with driveways
- Lot size: use lot sizes from previous analysis
- Building placement: use prototypes in Updating Seattle's Neighborhood Residential Zones report
- Tree placement: trees were placed based on professional judgement; trees were generally placed where at 25 years:
    - they would not overlap buildings; and
    - where soil space is not significantly less than canopy volume
- Canopy measurement
    - Canopy overlapping other sites: Count as if full block is redeveloped; tree canopy on adjacent lots from trees that overhang lot line still counts
    - Don't double count area of overlapping trees
    - Don't count area of trees overlapping buildings if species is small as they tend to be 30 feet or less, but do count for larger species trees

DRAFT Neighborhood Residential (NR) Proposed Tree Requirement
25-Year Canopy Growth

Shown: 1 Point required per 750 sq. ft. lot area for densities at least 1 unit / 1,600 sq. ft. of lot area

1 point	2 points	3 points	4 points	1 point per inch of trunk diameter 6" or more	N/A	
Small 8-15' canopy spread* 10' shown	**Small-Med.** 16-20' canopy spread* 16' shown	**Med.-Large** 21-25' canopy spread* 24' shown	**Large** 26-30' canopy spread* 28' shown	**Preserved** Assumes 10" diameter trunk 30' shown	**Street Tree** Assumes Medi-um-Large* 23' shown	* Assumed can-opy spread at 25 years

2 Duplexes No Parking (Prototype 4)



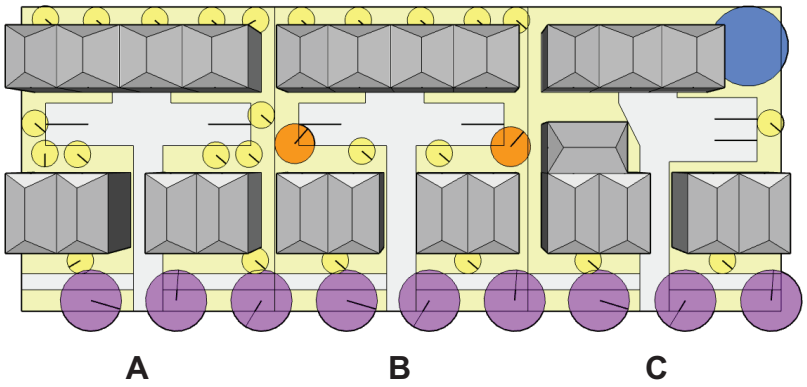
Calculations

- 5,000 sq. ft. lots (A - D): 7 pts. required
- 10,000 sq. ft. lot (E): 13 pts. required
- Canopy coverage half block: 23.1%

Findings & Observations

- Limited space for trees larger than small-medium on a single lot without modifying the prototype.
- A requirement higher than 1 pt. / 750 sq. ft. would be possible but would result in little use-able open space on site.
- Combined lot (E) with siting adjustments allows for Medium-Large and Large trees.
- Absence of parking and curbcuts allow for requrement to be met comfortably.

Duplexes / Fourplexes, Garage and Surface Parking (Prototype 2C with combined lots)



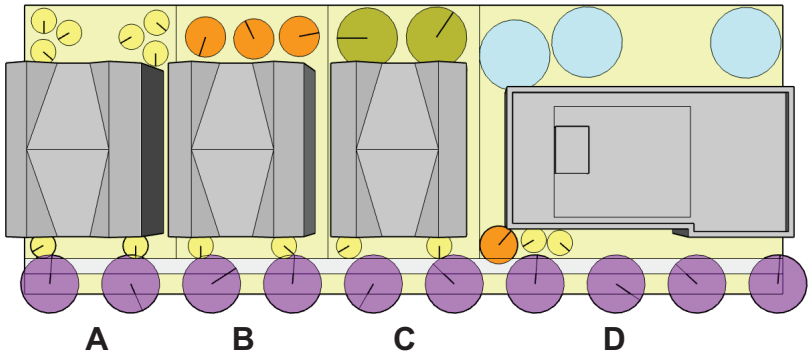
Calculations

- 10,000 sq. ft. lots: 13 pts. required
- Canopy coverage half block: 19.5%

Findings & Observations

- Limited space for trees larger than small-medium without modifying the prototype.
- A requirement higher than 1 pt. / 750 sq. ft. would be difficult to achieve under the prototype.
- Little useable open space on site.
- Siting modification (C) allows for preservation of an existing tree or large tree.
- Curbcuts reduce the number of street trees, decreasing the overall canopy coverage.

Stacked Flats No Parking (Prototype 6)



Calculations

- 6,000 sq. ft. lot (A-C): 8 pts. required
- 12,000 sq. ft. lot (D): 16 pts. required
- Canopy coverage half block: 25.3%

Findings & Observations

- Trees up to medium-large can be located without modifying the prototype
- A requirement higher than 1 pt. / 750 sq. ft. would be possible but would result in little use-able open space on site.
- Siting modification (D) allows for preservation of existing trees or multiple large trees.
- Absence of parking and curbcuts allow for requrement to be met comfortably.

DRAFT Neighborhood Residential (NR) Proposed Tree Requirement
25-Year Canopy Growth

Tree Size	Small	Small-Medium	Medium-Large	Large	Preserved	Total Points
Points	1	2	3	4	9	

2 Duplexes No Parking (Prototpye 4)						
Model Lot						
A	7					7
B	5	1				7
C	3	2				7
D	1	3				7
E	4	1	1	1		13
Half Block Total Area	34,200	sq. ft				
Street Trees	10					
Half Block Canopy Area	7,906					
Canopy Coverage	**23.1%**					

Duplexes / Fourplexes, Garage and Surface Parking (Prototype 2C with combined lots)						
Model Lot						
A	13					13
B	9	2				13
C	3				1	13
Half Block Total Area	34,200	sq. ft.				
Street Trees	6					
Half Block Canopy Area	6,668					
Canopy Coverage	**19.5%**					

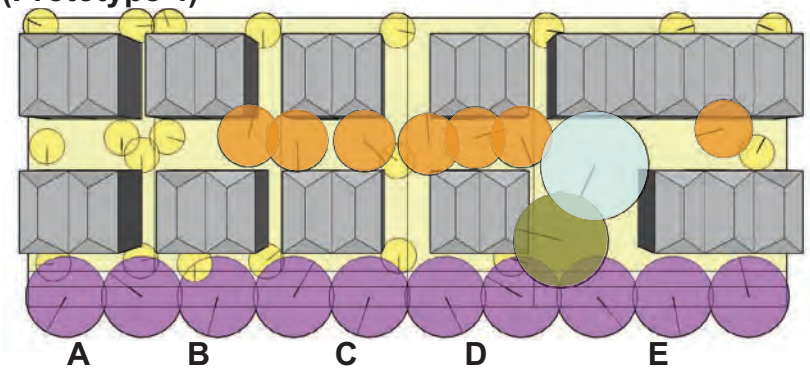
Stacked Flats No Parking (Prototpye 6)						
Model Lot						
A	8					8
B	2	3				8
C	2		2			8
D	2	1		3		16
Half Block Total Area	34,200	sq. ft				
Street Trees	10					
Half Block Canopy Area	8,669					
Canopy Coverage	**25.3%**					

DRAFT Neighborhood Residential (NR) Proposed Tree Requirement
Canopy At Maturity

Shown: 1 Point required per 750 sq. ft. lot area for densities at least 1 unit / 1,600 sq. ft. of lot area

1 point	2 points	3 points	4 points	1 point per inch of trunk diameter 6" or more	N/A	
Small 8-15' canopy spread* 10' shown	**Small-Med.** 16-20' canopy spread* 16' shown	**Med.-Large** 21-25' canopy spread* 24' shown	**Large** 26-30' canopy spread* 28' shown	**Preserved** Assumes 10" diameter trunk 30' shown	**Street Tree** Assumes Medi-um-Large* 23' shown	* Assumed can-opy spread at 25 years

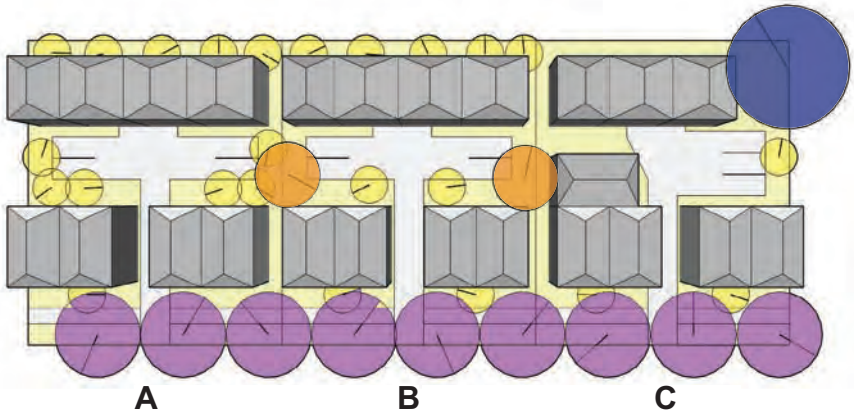
2 Duplexes No Parking (Prototype 4)



Calculations
- 5,000 sq. ft. lots (A - D): 7 pts. required
- 10,000 sq. ft. lot (E): 13 pts. required
- Canopy coverage half block: 43.1%

Findings & Observations
- At maturity tree canopy for small-medium sized trees and greater begins to overlap buildings.
- At maturity, tree canopy becomes layered.
- At maturity, tree planting requirement results in canopy exceeding the city's coverage goal.

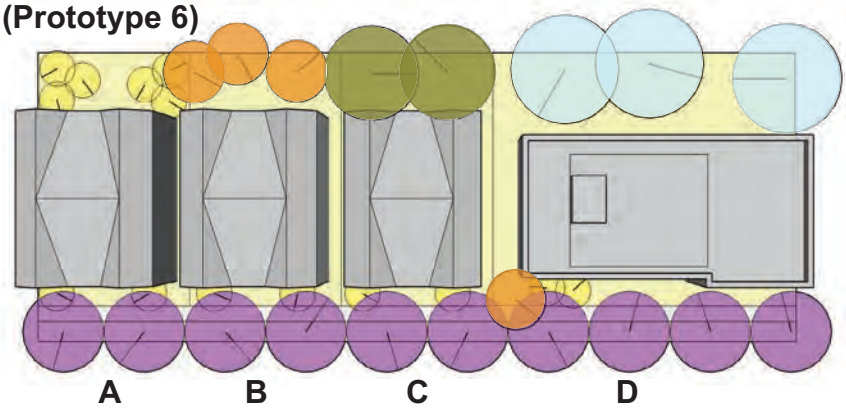
Duplexes / Fourplexes, Garage and Surface Parking (Prototype 2C with combined lots)



Calculations
- 10,000 sq. ft. lots: 13 pts. required
- Canopy coverage half block: 36%

Findings & Observations
- At maturity tree canopy for small-medium sized trees and greater begins to overlap buildings.
- At maturity, tree canopy becomes layered.
- At maturity, tree planting requirement results in canopy exceeding the city's coverage goal.

Stacked Flats No Parking (Prototype 6)



Calculations
- 6,000 sq. ft. lot (A-C): 8 pts. required
- 12,000 sq. ft. lot (D): 16 pts. required
- Canopy coverage half block: 46.4%

Findings & Observations
- At maturity, tree canopy for small-medium sized trees and greater begins to overlap buildings.
- At maturity, tree canopy becomes layered.
- At maturity, tree planting requirement results in canopy exceeding the city's coverage goal.

DRAFT Neighborhood Residential (NR) Proposed Tree Requirement
Canopy At Maturity

Tree Size	Small	Small-Medium	Medium-Large	Large	Preserved	Total Points
Points	1	2	3	4	9	

2 Duplexes No Parking (Prototpye 4)						
Model Lot						
A	7					7
B	5	1				7
C	3	2				7
D	1	3				7
E	4	1	1	1		13
Half Block Total Area	34,200	sq. ft				
Street Trees	10					
Half Block Canopy Area	14,730					
Canopy Coverage	**43.1%**					

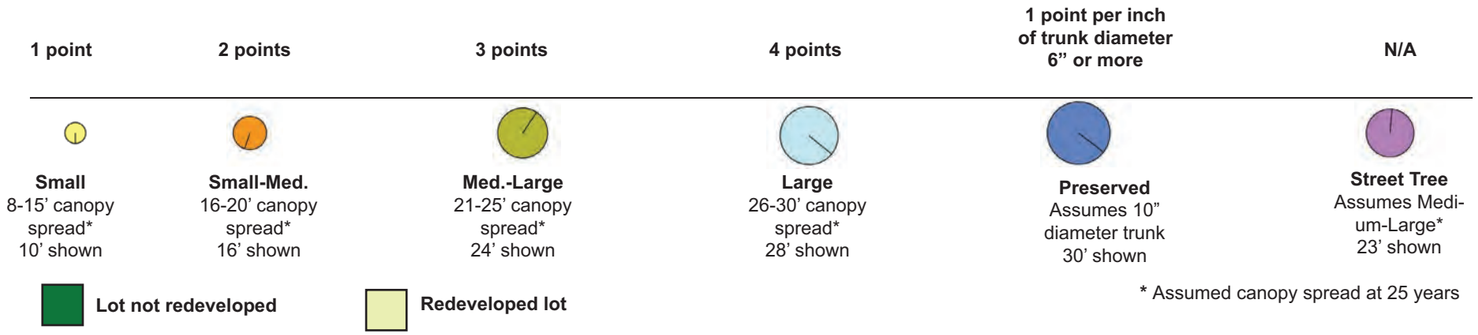
Duplexes / Fourplexes, Garage and Surface Parking (Prototype 2C with combined lots)						
Model Lot						
A	13					13
B	9	2				13
C	3				1	13
Half Block Total Area	34,200	sq. ft.				
Street Trees	6					
Half Block Canopy Area	12,327					
Canopy Coverage	**36.0%**					

Stacked Flats No Parking (Prototpye 6)						
Model Lot						
A	8					8
B	2	3				8
C	2		2			8
D	2	1		3		16
Half Block Total Area	34,200	sq. ft				
Street Trees	10					
Half Block Canopy Area	15,866					
Canopy Coverage	**46.4%**					

DRAFT Neighborhood Residential (NR) Proposed Tree Requirement

Shown:

- **1 Point required per 750 sq. ft. lot area for housing densities of 1 unit : 1,601 sq. ft. or greater**
- **1 Point required per 500 sq. ft. lot area for housing densities of 1 unit: 1,600 sq. ft. or less**
- **Tree planting requirement is higher for low density development**



Calculations & Assumptions

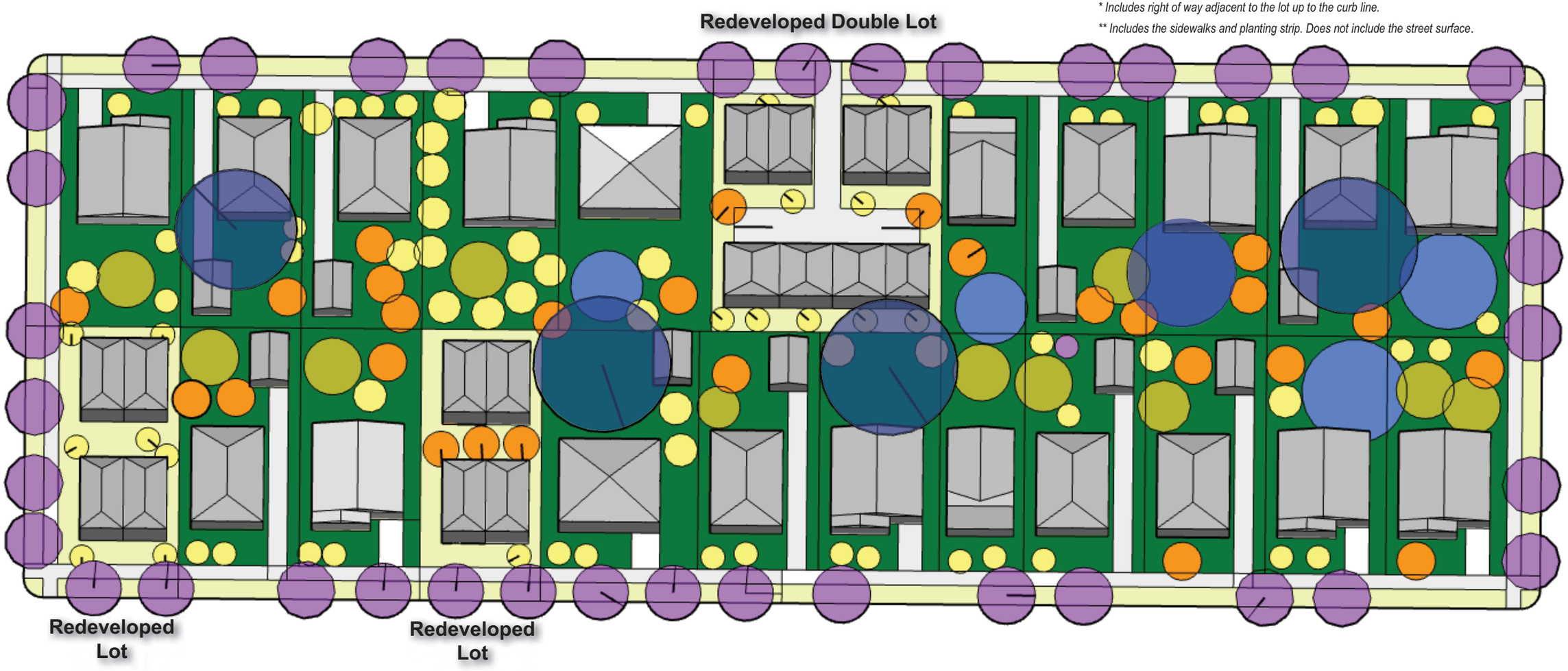
- 5,000 sq. ft. lots: 7 pts. required for high density; 10 pts. for low density
- 6,000 sq. ft. lots: 8 pts. required for high density; 12 pts. for low density
- Lots that are not redeveloped have existing canopy coverage of 12% - 46% consistent with existing conditions on blocks observed in aerial photos of North Seattle in 2024.
- 20 of 24 lots (84%) are not redeveloped.
- 4 of 24 lots (16%) are developed for the purposes of modeling a block on the high end of expected 20-year redevelopment scenarios. Analysis by EcoNW estimated that 8%-10% of NR lots might redevelop citywide over 20 years.
- Street trees are located at roughly 30' intervals on redeveloped lots.

Findings & Observations

- **Overall canopy coverage of 31% is achieved on the block as a whole including street trees.**
- Canopy coverage on lots not redeveloped* is 34%.
- Canopy coverage on redeveloped lots* is 21%.
- A heavily-treed existing condition with mature trees in the block would be necessary to achieve the 30% canopy coverage goal in the full block area.
- Of the total canopy coverage in the block, 89% is on lots not redeveloped, 11% is on redeveloped lots, and 26% is on the right of way.

** Includes right of way adjacent to the lot up to the curb line.*

*** Includes the sidewalks and planting strip. Does not include the street surface.*



G.4 Redevelopment Area Summary by Alternative

Alternative 1	Net New Housing Units	Land Developed per Net New Unit (sq. ft.)	Estimated Parcel Acres Developed
Urban Centers	36,970	642	544.59
Hub Urban Villages	12,885	642	189.80
Residential Urban Villages	14,764	642	217.48
Manufacturing Industrial Centers	1,476	642	21.74
Growth Area (Maritime Industrial)	676	642	9.96
Outside Subareas (This Alternative)	6,494	2,583	385.12
Outside Subareas (All Alternatives)	6,735	753	116.35
Total	**80,000**		**1,485.06**

Alternative 2	Net New Housing Units	Land Developed per Net New Unit (sq. ft.)	Estimated Parcel Acres Developed
Urban Centers	36,970	642	544.59
Hub Urban Villages	12,885	642	189.80
Residential Urban Villages	14,764	642	217.48
Manufacturing Industrial Centers	1,476	642	21.74
Growth Area (Maritime Industrial)	676	642	9.96
Neighborhood Anchor - Low Risk	20,019	753	345.85
Neighborhood Anchor - High Risk	4,148	753	71.66
Outside Subareas (This Alternative)	2,327	2,583	138.00
Outside Subareas (All Alternatives)	6,735	753	116.35
Total	**100,000**		**1,655.44**

Alternative 3	Net New Housing Units	Land Developed per Net New Unit (sq. ft.)	Estimated Parcel Acres Developed
Urban Centers	36,970	642	544.59
Hub Urban Villages	12,885	642	189.80
Residential Urban Villages	14,764	642	217.48
Manufacturing Industrial Centers	1,476	642	21.74
Growth Area (Maritime Industrial)	676	642	9.96
Neighborhood Residential	22,423	2,583	1,329.79
Outside Subareas (This Alternative)	4,071	642	59.97
Outside Subareas (All Alternatives)	6,735	753	116.35
Total	**100,000**		**2,489.69**

Alternative 4	Net New Housing Units	Land Developed per Net New Unit (sq. ft.)	Estimated Parcel Acres Developed
Urban Centers	36,970	642	545
Hub Urban Villages	12,885	642	190
Residential Urban Villages	14,764	642	217
Manufacturing Industrial Centers	1,476	642	22
Growth Area (Maritime Industrial)	676	642	10
Neighborhood Residential-Corridor	21,207	1,211	590
Outside Subareas (This Alternative)	5,287	2,583	314
Outside Subareas (All Alternatives)	6,735	753	116
Total	**100,000**		**2,003**

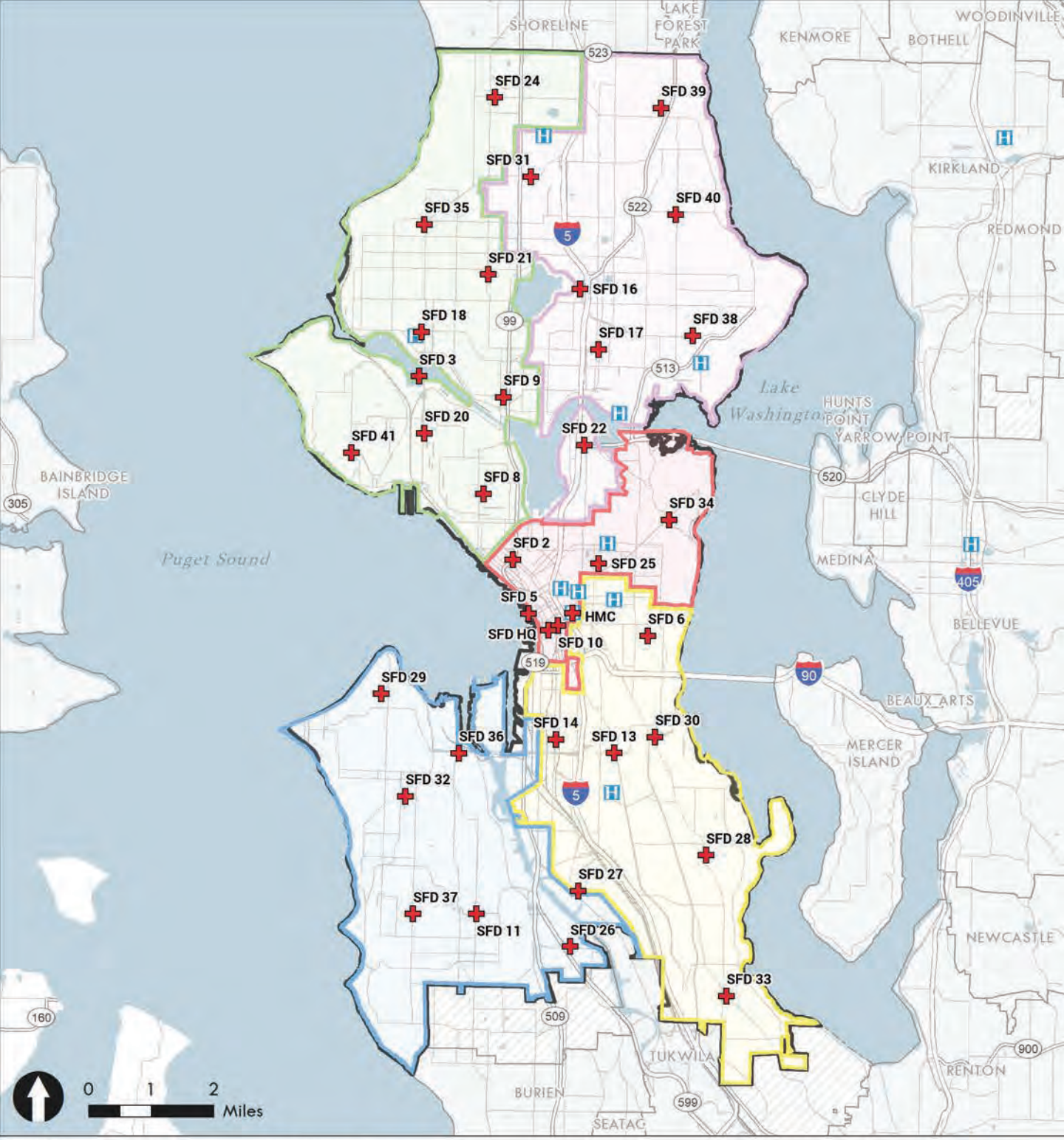
Alternative 5	Net New Housing Units	Land Developed per Net New Unit (sq. ft.)	Estimated Parcel Acres Developed
Urban Centers	43,051	642	634.17
Hub Urban Villages	7,855	642	115.71
Residential Urban Villages	22,862	642	336.77
Manufacturing Industrial Centers	1,476	642	21.74
Growth Area (Maritime Industrial)	676	642	9.96
Neighborhood Anchor - Low Risk	16,306	753	281.70
Neighborhood Anchor - High Risk	3,335	753	57.62
Neighborhood Residential	8,848	2,583	524.73
Neighborhood Residential-Corridor	8,856	1,211	246.20
Outside Subareas (This Alternative)	0	0	0.00
Outside Subareas (All Alternatives)	6,735	753	116.35
Total	**120,000**		**2,344.95**

Preferred Alternative	Net New Housing Units	Land Developed per Net New Unit (sq. ft.)	Estimated Parcel Acres Developed
Regional Center - Metro	34,997	642	515.53
Regional Center - Urban	8,000	642	117.84
Urban Center	28,984	642	426.96
Neighborhood Center	10,417	753	179.96
Urban Neighborhood - Frequent Transit Corridor	9,408	738	159.31
Urban Neighborhood - Neighborhood Residential	21,069	2,583	1,249.48
Urban Neighborhood - Other Multifamily	727	753	12.56
Manufacturing-Industrial Center	800	642	11.79
DEIS Outside Subareas (All Alternatives)	5,598	753	96.71
Total	**120,000**		**2,770.14**

H Transportation Appendix

	Inbound									Outbound							
Route	Inbound Trips in PM Period	Average Maximum Load of PM Period Trips	Average Max Load of Most Crowded PM Period Trip	Average Crowding Threshold	Crowding Threshold Ratio of Average Max Load over PM Peak Period	Crowding Threshold Ratio of Average Max Load of Most Crowded PM Peak Period Trip	Number of Trips Over Crowding Threshold	Percent of Trips Over Crowding Threshold	Outbound Trips in PM Period	Average Maximum Load of PM Period Trips	Average Max Load of Most Crowded PM Period Trip	Average Crowding Threshold	Crowding Threshold Ratio of Average Max Load over PM Peak Period	Crowding Threshold Ratio of Average Max Load of Most Crowded PM Peak Period Trip	Number of Trips Over Crowding Threshold	Percent of Trips Over Crowding Threshold
1	17	14	23	52	0.27	0.44	0	0%	18	27	41	52	0.53	0.79	0	0%
2	22	25	41	52	0.48	0.79	0	0%	18	37	47	52	0.71	0.90	0	0%
3	18	33	46	52	0.63	0.88	0	0%	15	32	44	52	0.62	0.85	0	0%
4	11	31	44	52	0.59	0.85	0	0%	17	28	43	52	0.54	0.83	0	0%
5	15	21	35	78	0.27	0.44	0	0%	31	46	66	77	0.60	0.94	0	0%
7	29	22	41	74	0.29	0.55	0	0%	28	37	54	74	0.51	0.73	0	0%
8	21	55	72	78	0.71	0.92	0	0%	19	29	44	78	0.37	0.56	0	0%
9	5	13	17	51	0.26	0.33	0	0%	7	25	31	51	0.49	0.61	0	0%
10	27	11	23	52	0.22	0.44	0	0%	27	22	32	52	0.42	0.62	0	0%
11	16	21	29	79	0.27	0.37	0	0%	16	41	59	79	0.53	0.75	0	0%
12	22	16	24	52	0.31	0.46	0	0%	21	25	39	52	0.48	0.75	0	0%
13	16	19	25	52	0.37	0.48	0	0%	16	34	43	52	0.65	0.83	0	0%
14	16	13	30	52	0.24	0.58	0	0%	16	37	49	52	0.71	0.94	0	0%
15	0	-	0	-	-	0.00	0	-	10	52	64	79	0.66	0.81	0	0%
17	0	-	0	-	-	0.00	0	-	9	48	68	79	0.60	0.86	0	0%
18	0	-	0	-	-	0.00	0	-	9	45	60	76	0.60	0.88	0	0%
19	0	-	0	-	-	0.00	0	-	6	25	36	60	0.42	0.71	0	0%
21	15	23	40	78	0.29	0.51	0	0%	27	34	60	79	0.43	0.76	0	0%
22	4	8	19	51	0.16	0.37	0	0%	4	7	11	51	0.14	0.22	0	0%
24	8	19	29	68	0.27	0.43	0	0%	11	39	54	73	0.54	0.69	0	0%
26	8	19	27	78	0.25	0.35	0	0%	12	43	60	78	0.55	0.77	0	0%
27	8	12	19	68	0.17	0.25	0	0%	10	26	45	62	0.42	0.71	0	0%
28	8	11	14	78	0.14	0.18	0	0%	15	49	65	76	0.65	0.83	0	0%
29	0	-	0	-	-	0.00	0	-	12	33	54	60	0.56	0.71	0	0%
31	8	14	19	60	0.24	0.31	0	0%	10	30	37	58	0.52	0.73	0	0%
32	11	20	29	59	0.34	0.57	0	0%	11	31	46	59	0.53	0.94	0	0%
33	8	21	31	68	0.30	0.40	0	0%	12	35	52	69	0.50	0.96	0	0%
36	38	15	33	58	0.27	0.58	0	0%	34	34	49	58	0.59	0.94	0	0%
37	0	-	0	-	-	0.00	0	-	4	14	16	58	0.24	0.31	0	0%
40	22	30	48	77	0.39	0.62	0	0%	40	49	74	74	0.66	1.12	1	3%
41	18	14	21	79	0.18	0.27	0	0%	37	42	60	79	0.53	0.76	0	0%
43	4	21	29	75	0.28	0.39	0	0%	6	14	20	77	0.18	0.25	0	0%
44	27	21	30	74	0.29	0.41	0	0%	26	50	66	74	0.68	0.89	0	0%
45	19	16	20	77	0.22	0.37	0	0%	26	45	64	76	0.59	0.82	0	0%
47	10	4	5	52	0.08	0.10	0	0%	10	11	16	52	0.22	0.31	0	0%
48	25	28	47	69	0.41	0.65	0	0%	21	16	50	68	0.23	0.64	0	0%
49	20	31	43	63	0.48	0.83	0	0%	21	30	39	64	0.47	0.73	0	0%
50	10	17	22	37	0.46	0.59	0	0%	11	18	29	37	0.50	0.78	0	0%
55	1	38	38	79	0.48	0.48	0	0%	11	29	42	74	0.39	0.55	0	0%
56	0	-	0	-	-	0.00	0	-	8	39	53	79	0.49	0.67	0	0%
57	0	-	0	-	-	0.00	0	-	5	41	49	79	0.52	0.62	0	0%
60	17	21	50	51	0.42	0.98	0	0%	16	27	35	51	0.53	0.69	0	0%
62	16	28	39	76	0.37	0.50	0	0%	22	49	68	71	0.69	1.00	1	5%
63	0	-	0	-	-	0.00	0	-	9	41	53	51	0.81	1.04	1	11%
64	0	-	0	-	-	0.00	0	-	8	42	57	68	0.62	1.00	1	13%
65	23	12	29	61	0.20	0.59	0	0%	26	40	52	61	0.66	0.98	0	0%
67	25	14	22	60	0.23	0.45	0	0%	24	40	54	60	0.66	0.98	0	0%
70	25	27	46	75	0.36	0.62	0	0%	26	39	56	75	0.52	0.72	0	0%
71	8	12	14	51	0.24	0.27	0	0%	8	28	33	51	0.54	0.65	0	0%
74	0	-	0	-	-	0.00	0	-	11	28	45	79	0.36	0.57	0	0%
75	19	14	18	59	0.23	0.38	0	0%	21	30	44	60	0.51	0.90	0	0%
76	0	-	0	-	-	0.00	0	-	11	48	63	78	0.62	0.81	0	0%
77	0	-	0	-	-	0.00	0	-	10	41	63	79	0.52	0.80	0	0%
78	6	4	4	49	0.07	0.08	0	0%	6	8	10	49	0.16	0.20	0	0%
C Line	673	28	15	21	76	0.19	0.28	0	0%	39	48	62	76	0.63	0.82	0	0%
D Line	674	30	34	49	76	0.45	0.64	0	0%	33	54	70	76	0.71	0.92	0	0%
E Line	675	25	33	55	76	0.43	0.72	0	0%	44	52	73	76	0.68	0.96	0	0%

I Area Specific Service Maps

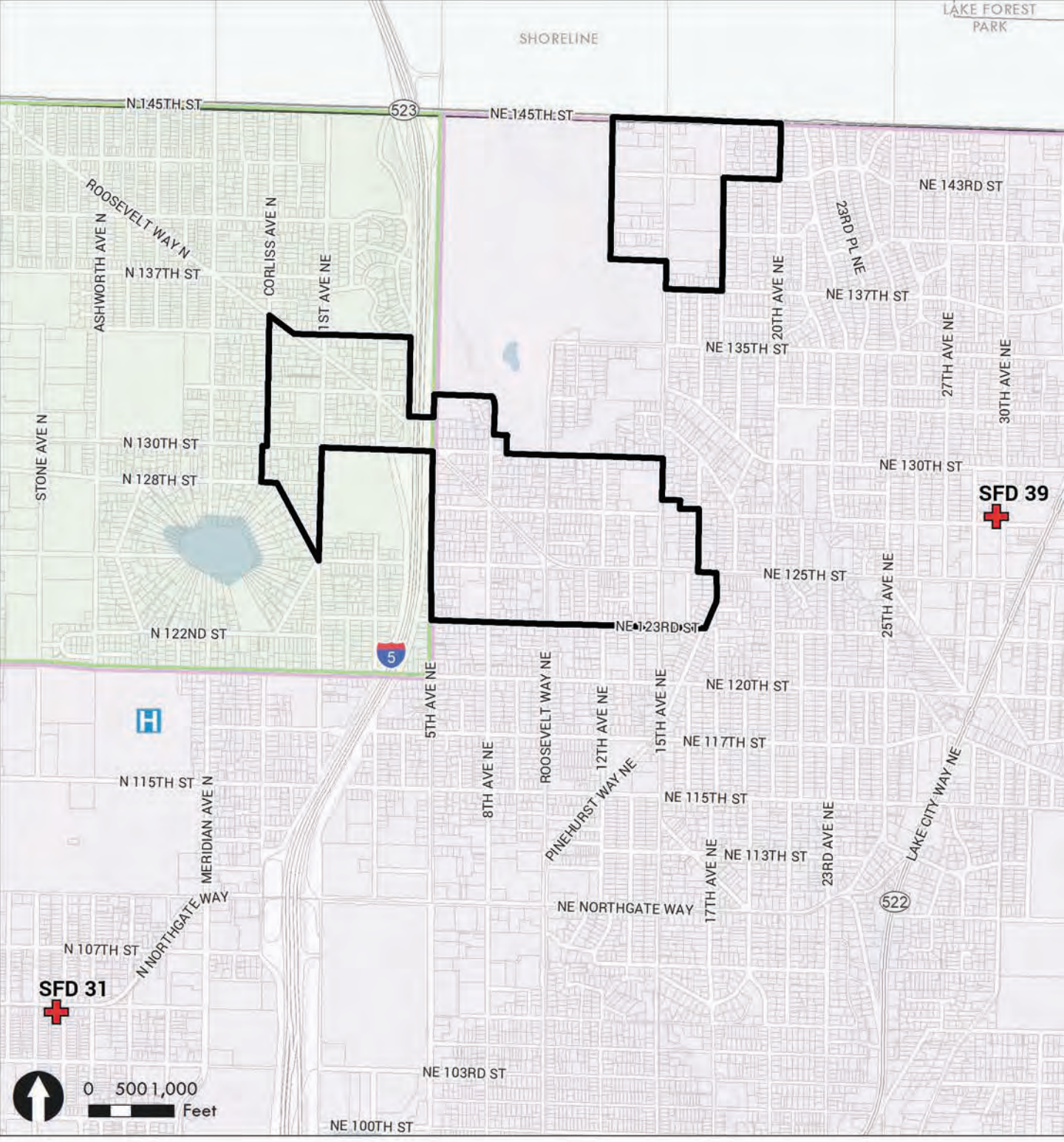


City of Seattle
Urban Growth Areas
Other Cities
Analysis Zones
Fire Station
Hospital

Fire Battalions

Battalion 2
Battalion 4
Battalion 5
Battalion 6
Battalion 7

Map Date: February 2023

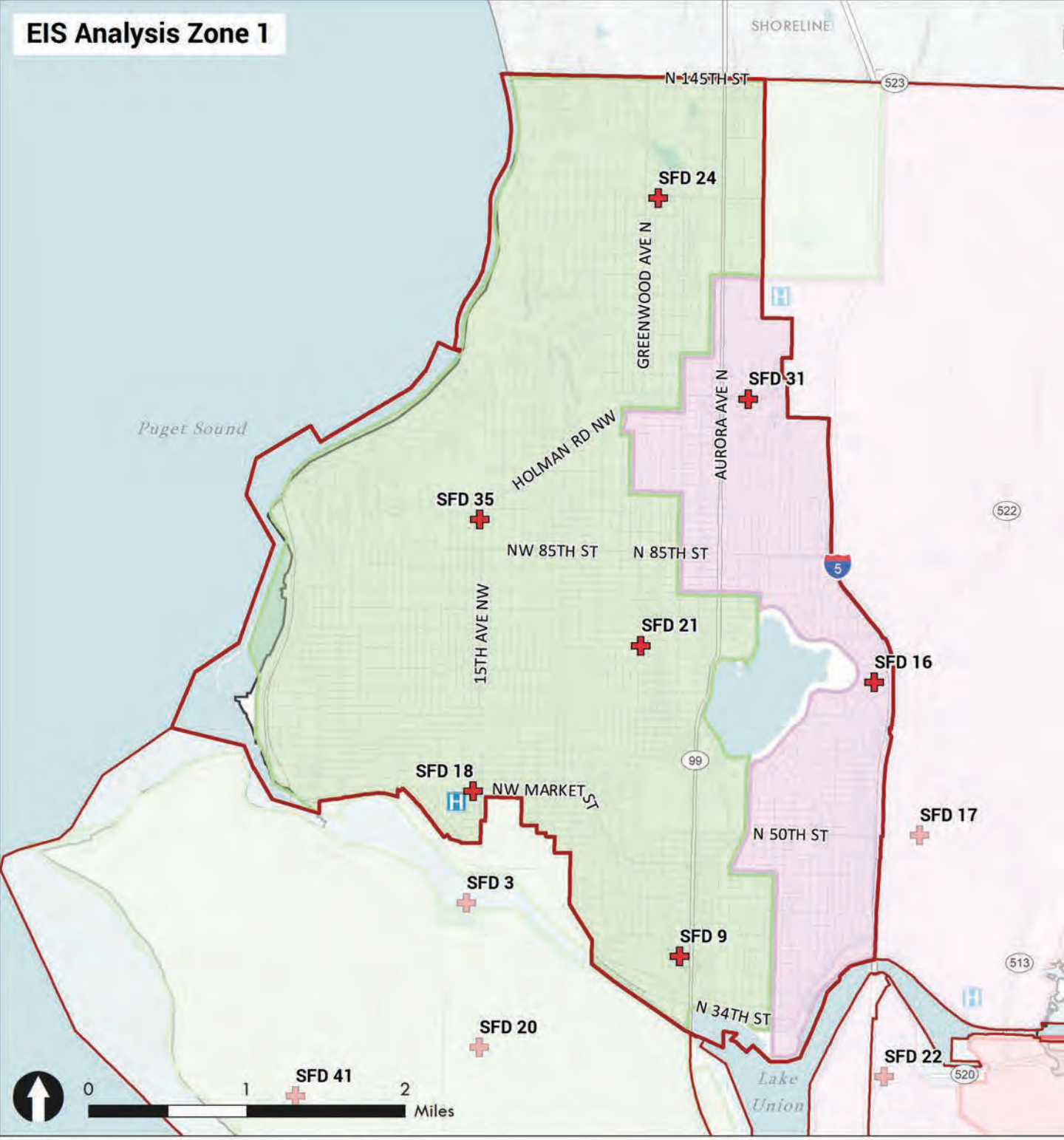


- City of Seattle
- Urban Growth Areas
- Other Cities
- 130th/145th Station Areas
- Fire Station
- Hospital

Fire Battalions

- Battalion 2
- Battalion 4
- Battalion 5
- Battalion 6
- Battalion 7

Map Date: 2415 '3

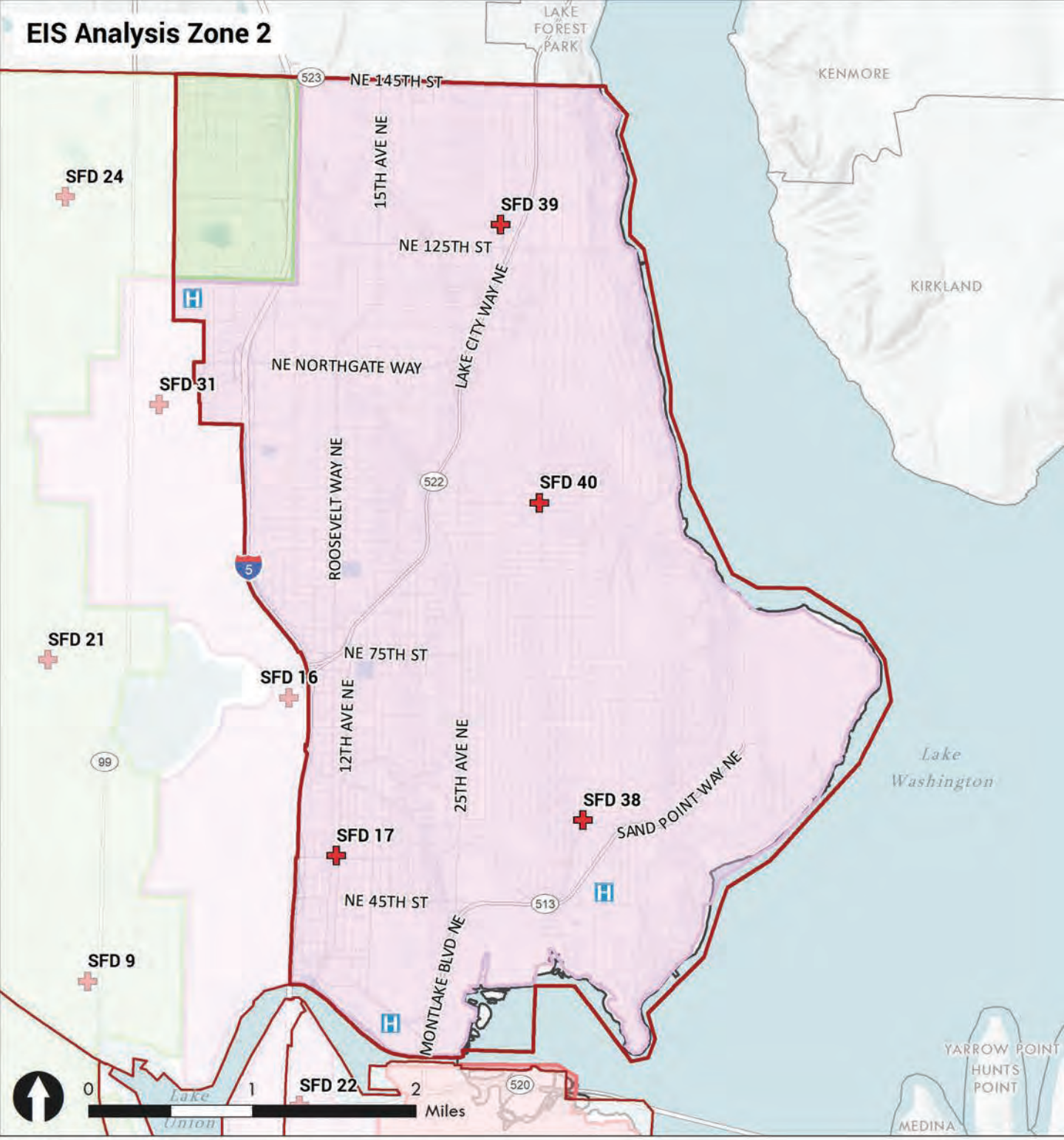


- City of Seattle
- Urban Growth Areas
- Other Cities
- Analysis Zones
- Fire Station
- Hospital

Fire Battalions

- Battalion 2
- Battalion 4
- Battalion 5
- Battalion 6
- Battalion 7

Map Date: February 2023



- City of Seattle
- Urban Growth Areas
- Other Cities
- Analysis Zones
- Fire Station
- Hospital

Fire Battalions

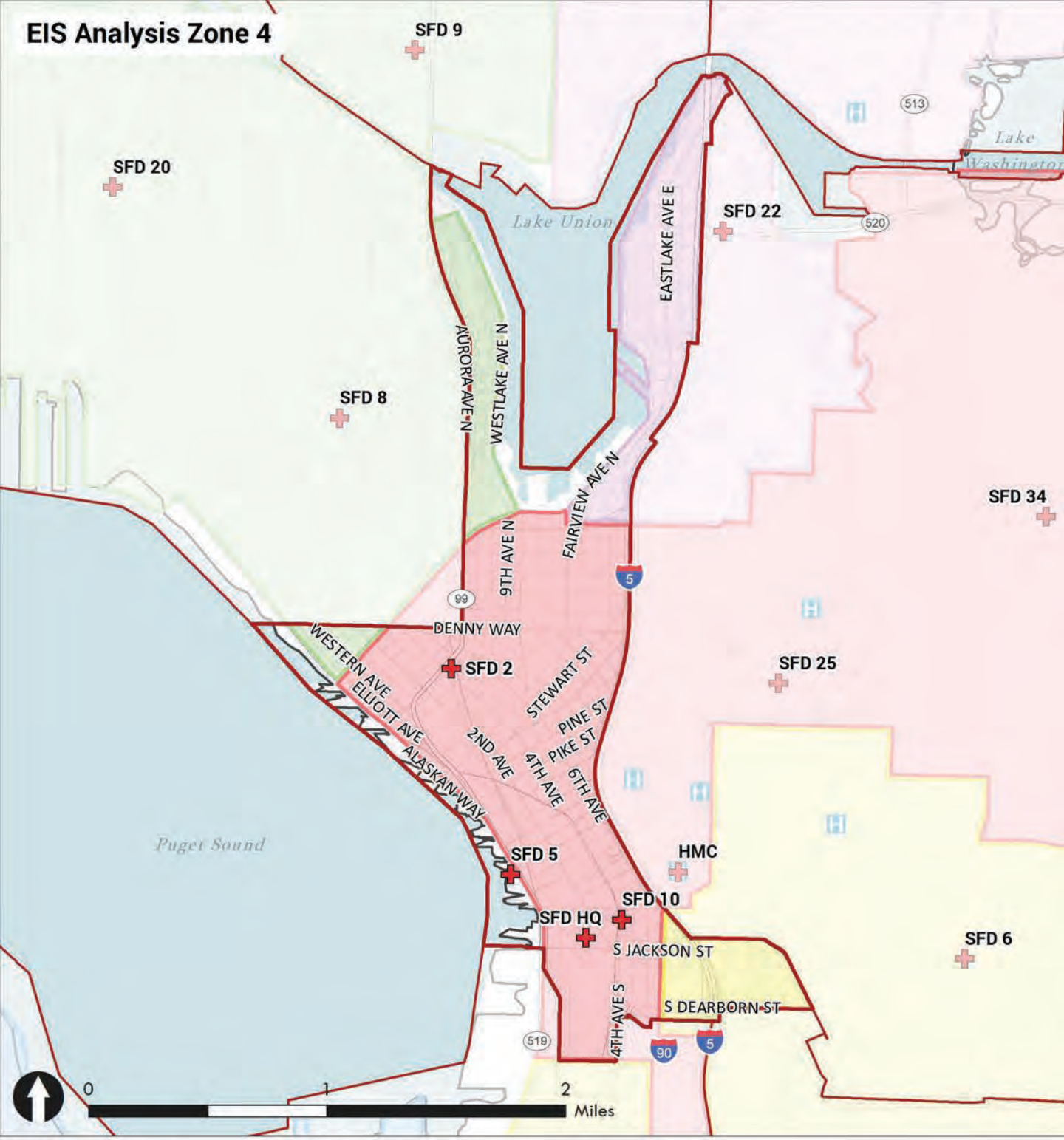
- Battalion 2
- Battalion 4
- Battalion 5
- Battalion 6
- Battalion 7

Map Date: February 2023

City of Seattle
Urban Growth Areas
Other Cities
Analysis Zones
Fire Station
Hospital

Fire Battalions
Battalion 2
Battalion 4
Battalion 5
Battalion 6
Battalion 7

Map Date: February 2023

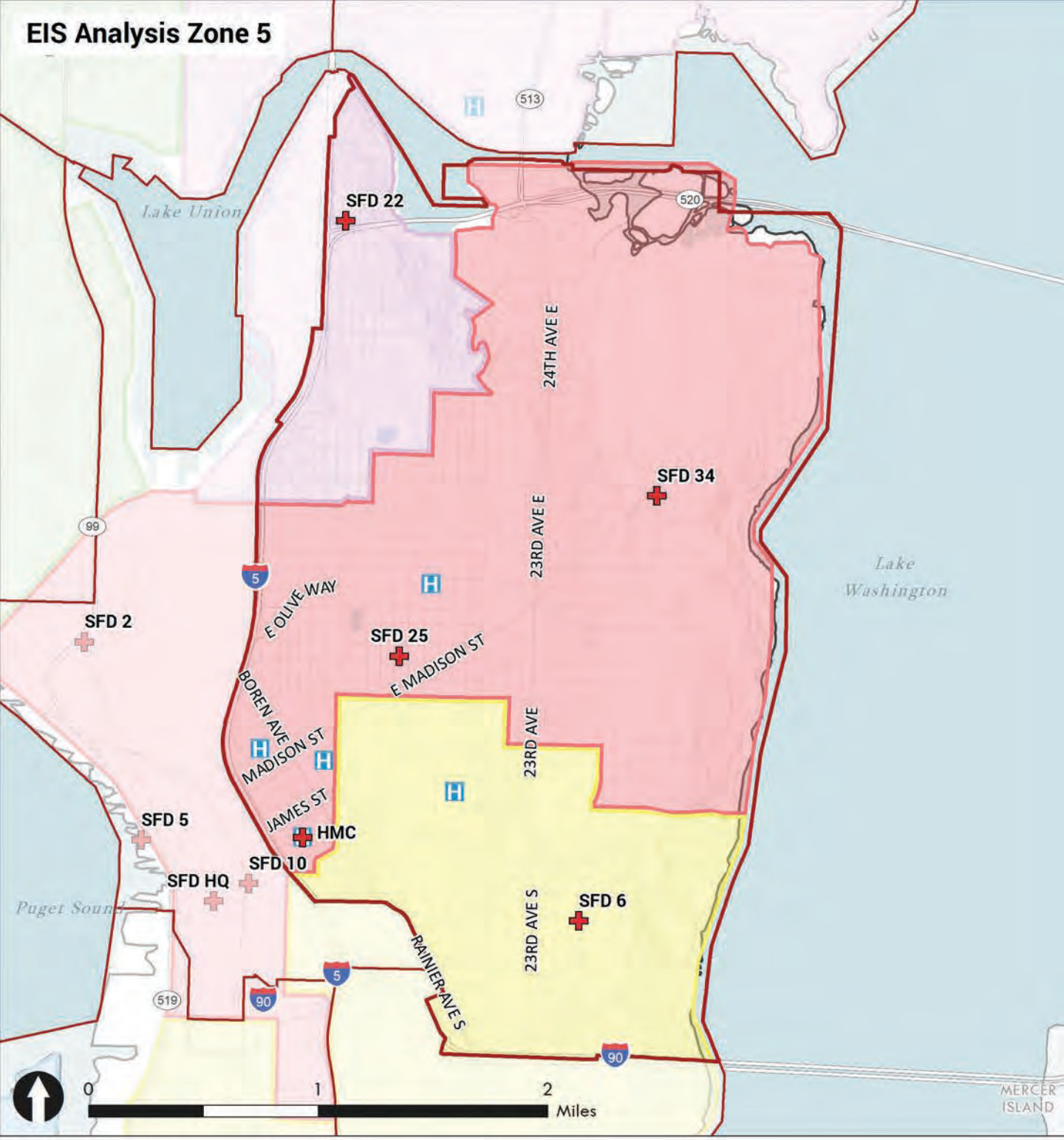


City of Seattle
Urban Growth Areas
Other Cities
Analysis Zones
Fire Station
Hospital

Fire Battalions

Battalion 2
Battalion 4
Battalion 5
Battalion 6
Battalion 7

Map Date: February 2023

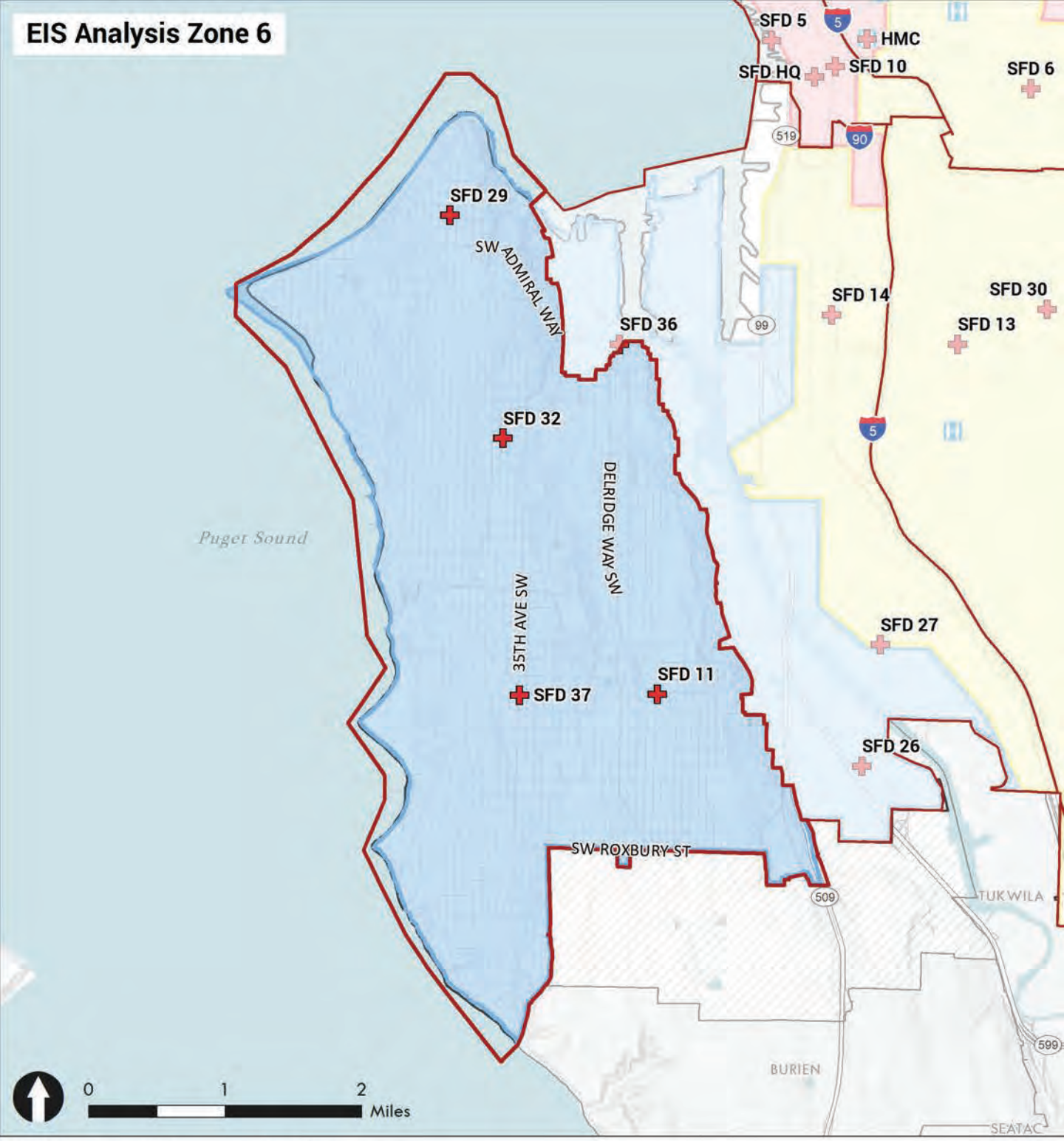


City of Seattle
Urban Growth Areas
Other Cities
Analysis Zones
Fire Station
Hospital

Fire Battalions

Battalion 2
Battalion 4
Battalion 5
Battalion 6
Battalion 7

Map Date: February 2023

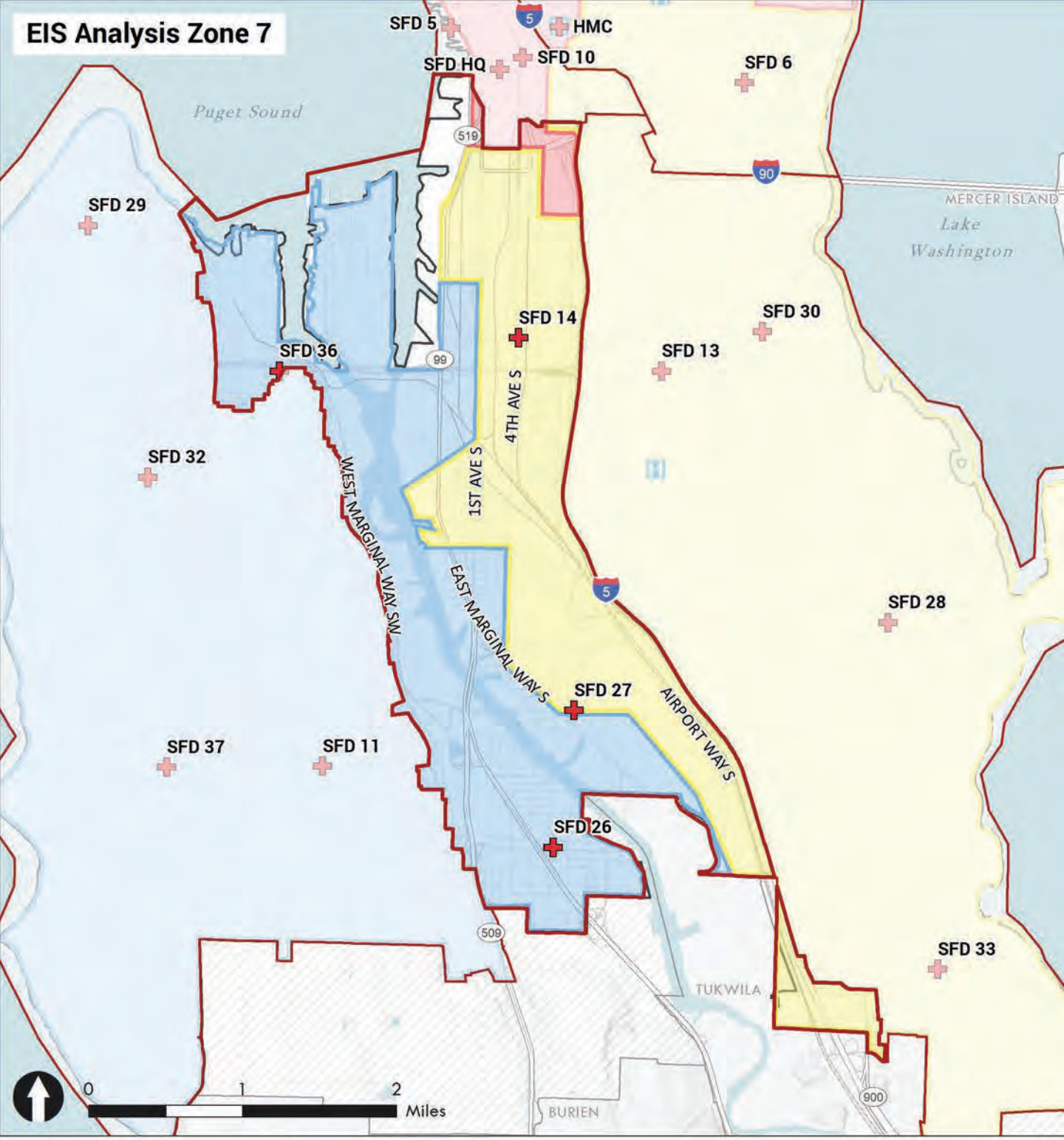


- City of Seattle
- Urban Growth Areas
- Other Cities
- Analysis Zones
- Fire Station
- Hospital

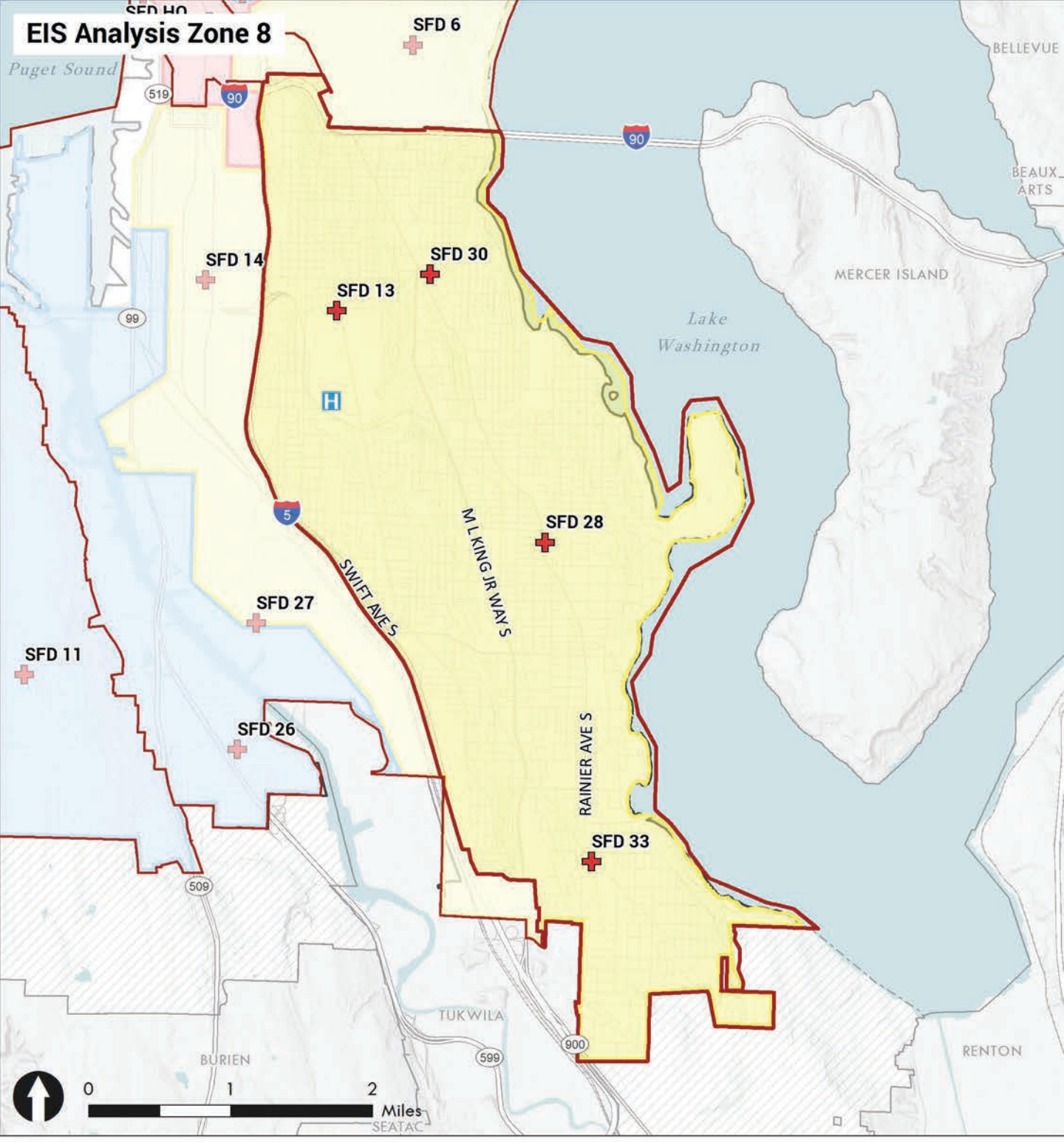
Fire Battalions

- Battalion 2
- Battalion 4
- Battalion 5
- Battalion 6
- Battalion 7

Map Date: February 2023



Map Date: February 2023

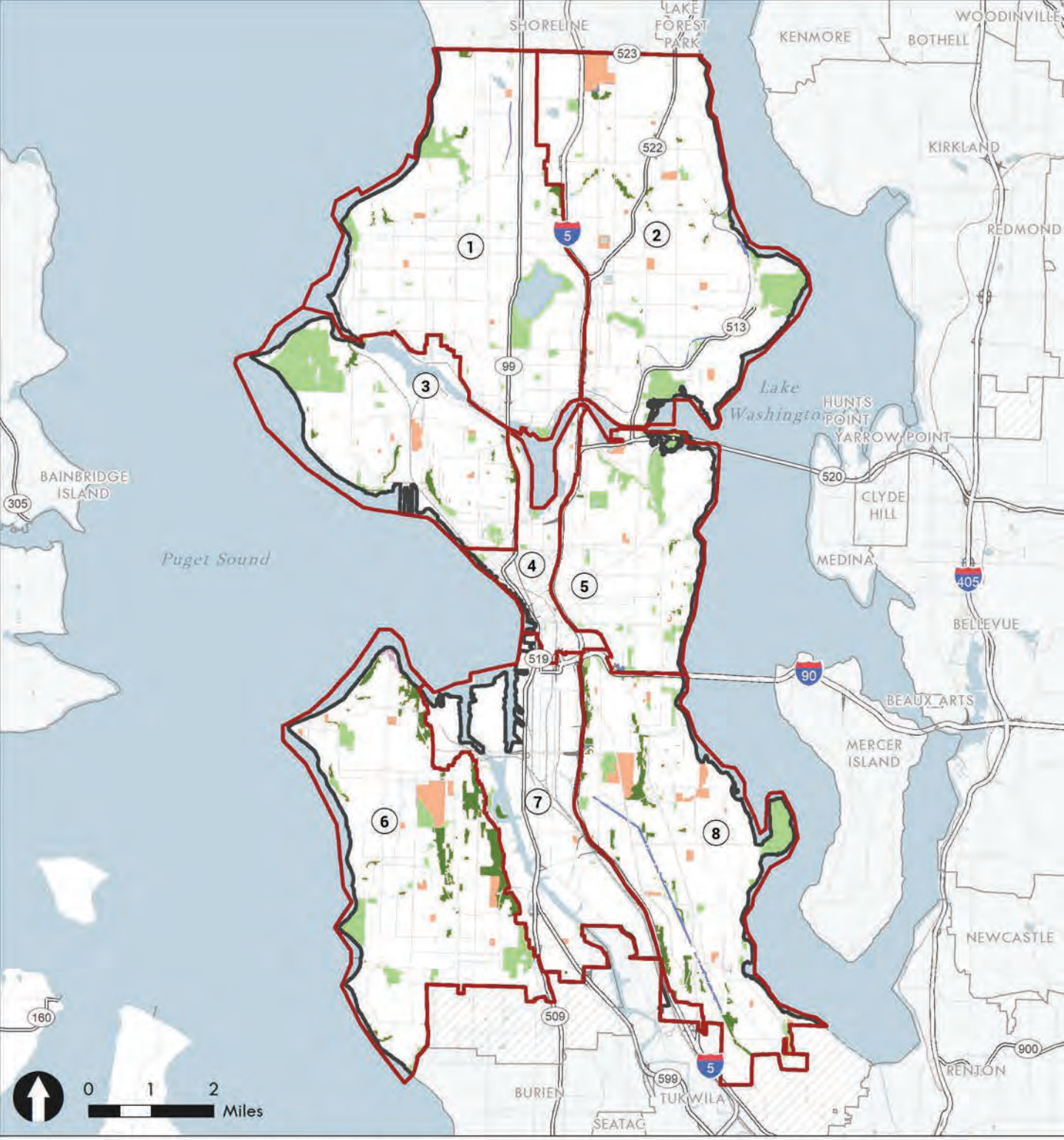


- City of Seattle
- Urban Growth Areas
- Other Cities
- Analysis Zones
- Fire Station
- Hospital

Fire Battalions

- Battalion 2
- Battalion 4
- Battalion 5
- Battalion 6
- Battalion 7

Map Date: February 2023

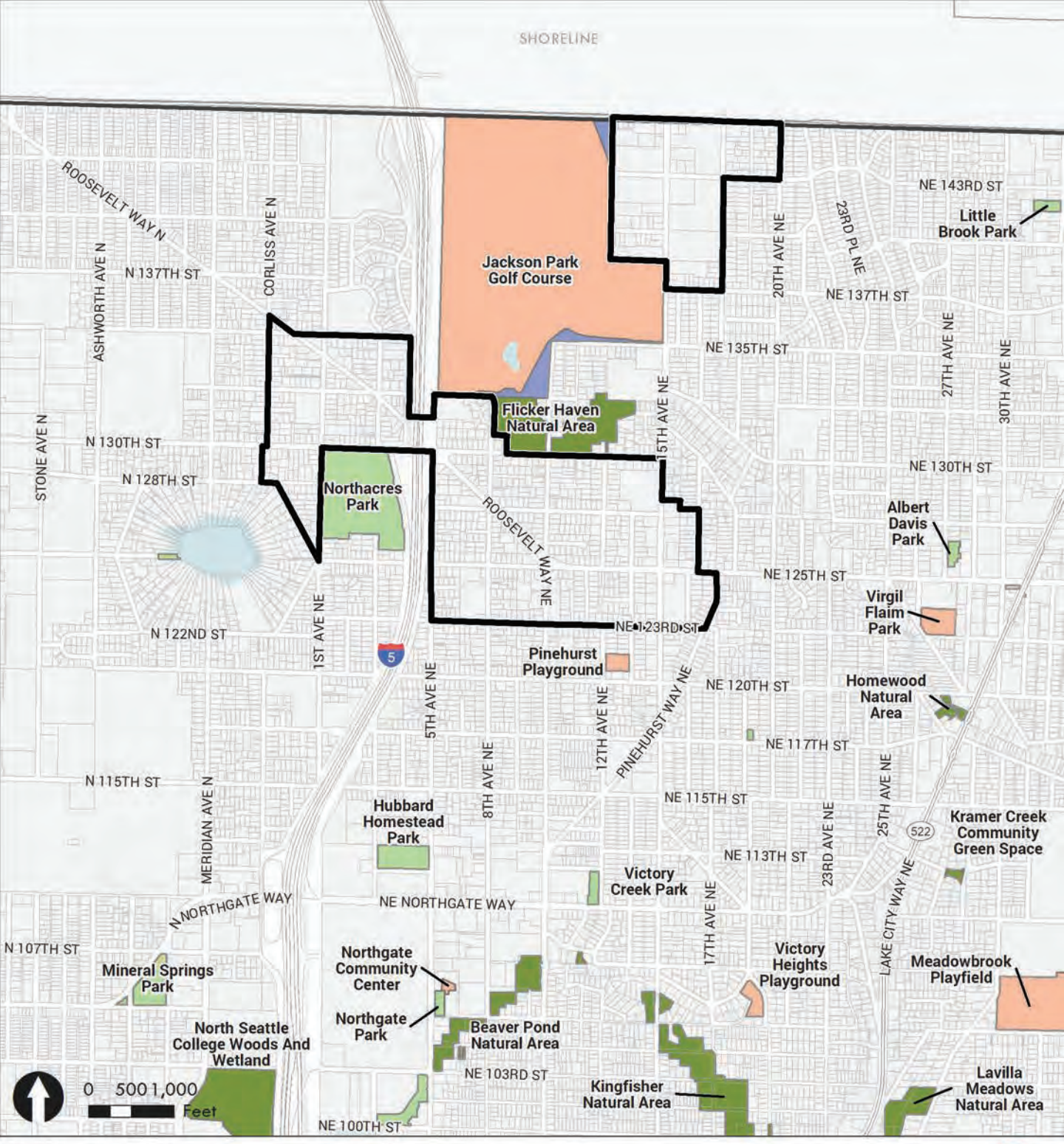


City of Seattle
Urban Growth Areas
Other Cities
Analysis Zones

Public Parks and Open Space

Parks
Playfields and Golf Courses
Greenbelts
Trails
Viewpoints

Map Date: March 2023



City of Seattle

Urban Growth Areas

Other Cities

130th/145th Station Areas

Public Parks and Open Space

Parks

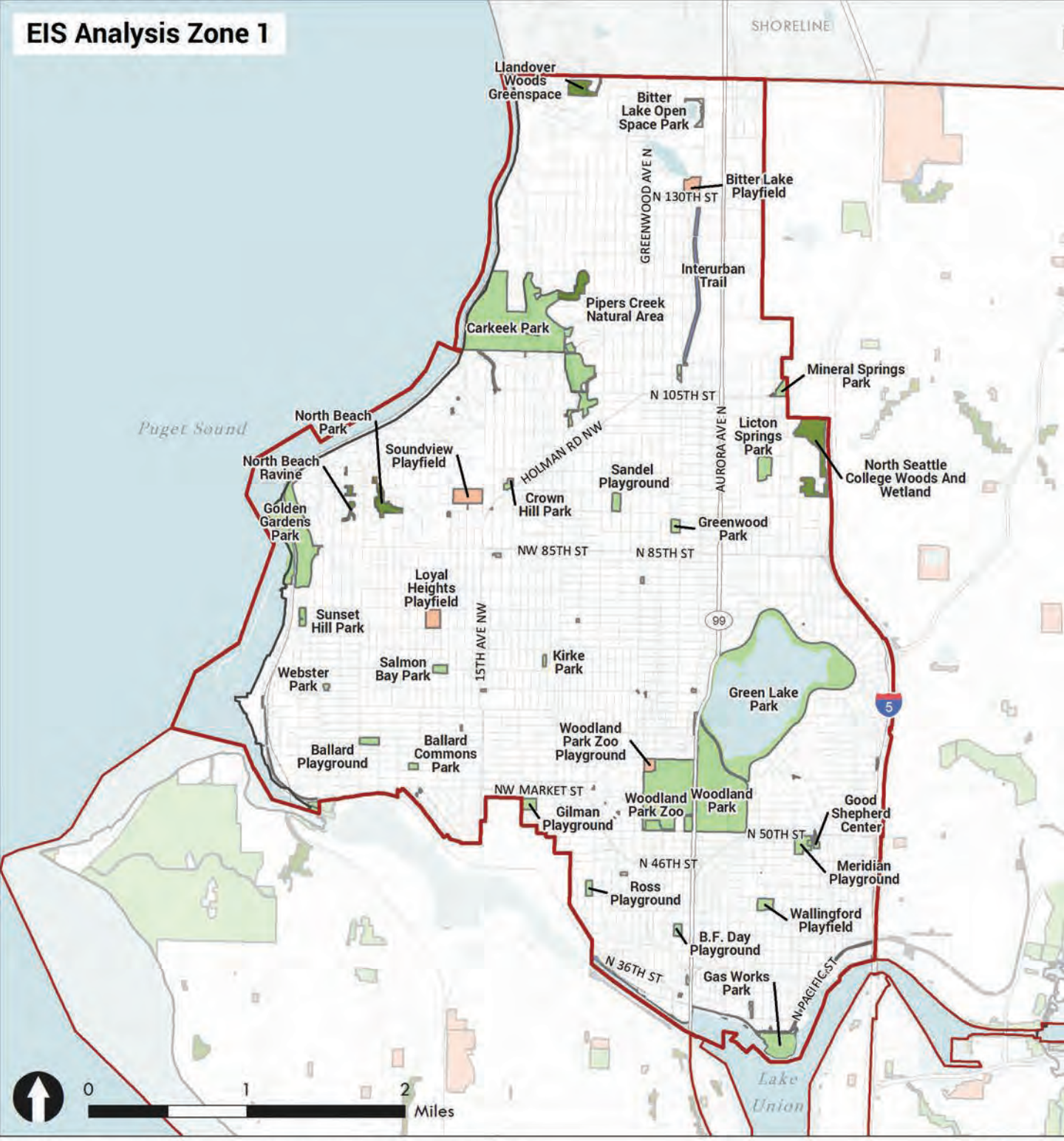
Playfields and Golf Courses

Greenbelts

Trails

Viewpoints

Map Date: March 2023


EIS Analysis Zone 1
SHORELINE
Llandover Woods Greenspace
Bitter Lake Open Space Park
Bitter Lake Playfield
N 130TH ST
GREENWOOD AVE N
Interurban Trail
Pipers Creek Natural Area
Carkeek Park
Mineral Springs Park
N 105TH ST
Puget Sound
North Beach Park
Soundview Playfield
HOLMAN RD NW
AURORA AVE N
Licton Springs Park
North Seattle College Woods And Wetland
North Beach Ravine
Golden Gardens Park
Crown Hill Park
Sandel Playground
Greenwood Park
NW 85TH ST
N 85TH ST
Loyal Heights Playfield
Sunset Hill Park
15TH AVE NW
99
Webster Park
Salmon Bay Park
Kirke Park
Green Lake Park
5
Ballard Playground
Ballard Commons Park
Woodland Park Zoo Playground
NW MARKET ST
Gilman Playground
Woodland Park Zoo
Woodland Park
Good Shepherd Center
N 50TH ST
N 46TH ST
Meridian Playground
Ross Playground
Wallingford Playfield
B.F. Day Playground
N 36TH ST
Gas Works Park
N PACIFIC ST
Lake Union
0
1
2
Miles
City of Seattle
Urban Growth Areas
Other Cities
Analysis Zones
Public Parks and Open Space
Parks
Playfields and Golf Courses
Greenbelts
Trails
Viewpoints
Map Date: March 2023

EIS Analysis Zone 2

City of Seattle

Urban Growth Areas

Other Cities

Analysis Zones

Public Parks and Open Space

Parks

Playfields and Golf Courses

Greenbelts

Trails

Viewpoints

Map Date: March 2023

EIS Analysis Zone 3
Carl S English, Jr Gardens
Commodore Park
Discovery Park
Hiram M. Chittenden Locks
Kiwanis Memorial Preserve Park
Lawton Park
LEARY WAY NW
W EMERSON PL
15TH RP
W NICKERSON ST
NICKERSON ST
South Ship Canal Trail
Carleton Highlands
Magnolia Water Tower Open Space
Magnolia Manor Park
Interbay Athletic Field
Mayfair Park
Queen Anne Bowl Playfield
Magnolia Boulevard Greenbelt
Lowery C. Mounger Pool
Bayview Playground
Interbay Golf
David Rodgers Park
Wolf Creek Ravine Natural Area
Ella Bailey Park
Magnolia Greenbelt
15TH AVE W
East Queen Anne Playground
Magnolia Park
Thorndyke Park
Ursula Judkins Viewpoint
SW Queen Anne Greenbelt
West Queen Anne Playfield
NE Queen Anne Greenbelt
Smith Cove Park
Kerry Park And Viewpoint
Bhy Kracke Park
Marshall Park
Puget Sound
Kinnear Park
ROY ST
MERCER ST
1ST AVE N
Seattle Center
5TH AVE N
ELLIOTT AVE W
Elliott Bay Trail
Centennial Park
Myrtle Edwards Park
0
1
2
Miles
City of Seattle
Urban Growth Areas
Other Cities
Analysis Zones
Public Parks and Open Space
Parks
Playfields and Golf Courses
Greenbelts
Trails
Viewpoints
Map Date: March 2023

EIS Analysis Zone 4

- City of Seattle
- Urban Growth Areas
- Other Cities
- Analysis Zones

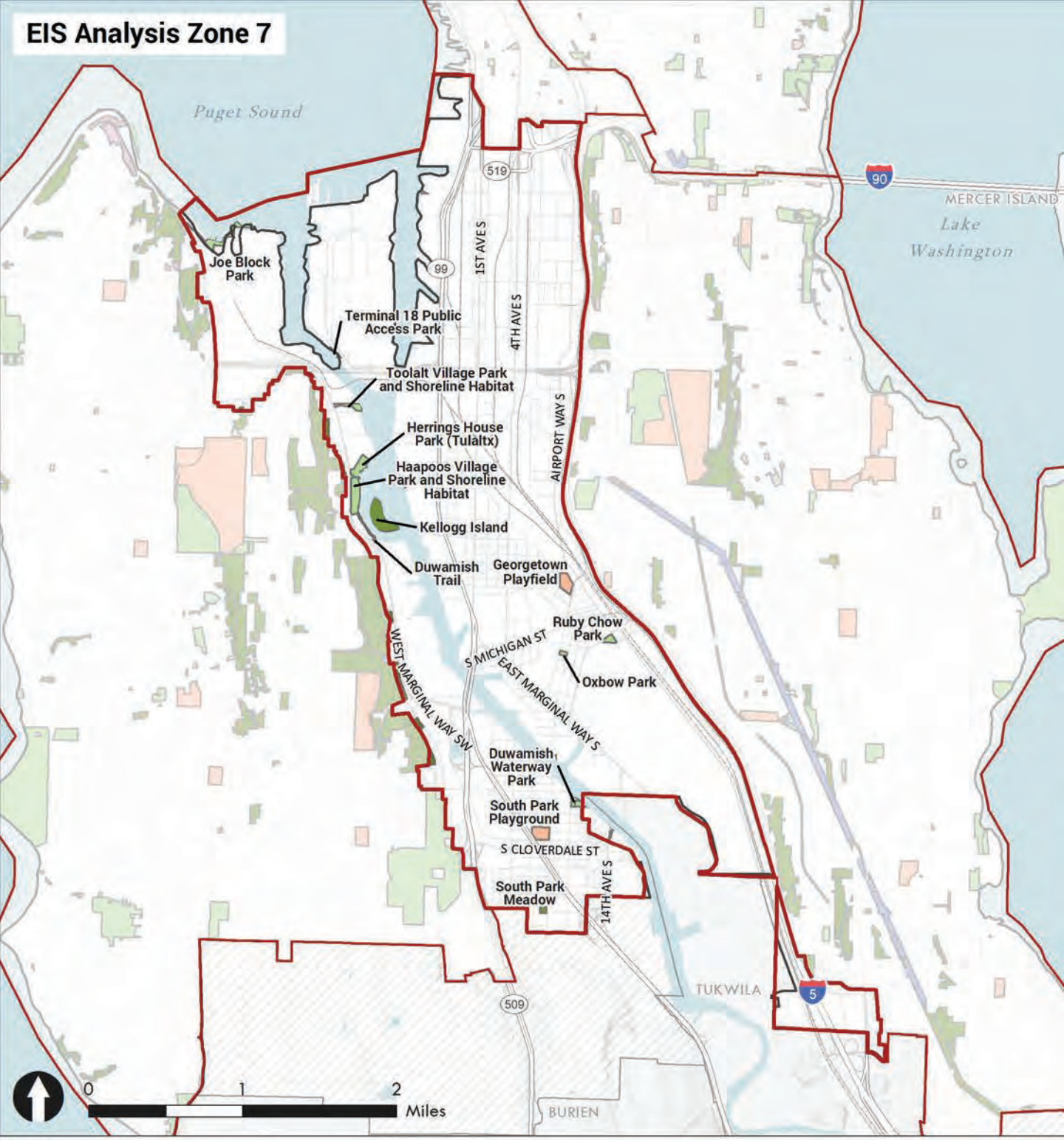
Public Parks and Open Space

- Parks
- Playfields and Golf Courses
- Greenbelts
- Trails
- Viewpoints

Map Date: March 2023

EIS Analysis Zone 5
West Montlake Park
Roanoke Park
East Montlake Park
Montlake Playfield
Lake Union
Madison Park North Beach
Madison Park
I-5 Colonnade
Boren Park
Interlaken Park
Washington Park And Arboretum
St Marks Greenbelt
Volunteer Park
24TH AVE E
Bellevue Place
Washington Park
Lake Washington
Pendleton Miller Playfield
23RD AVE E
Lakeview Park
Harrison Ridge Greenbelt
E OLIVE WAY
Homer Harris Park
Viretta Park
Cal Anderson Park
Howell Park
E MADISON ST
Alvin Larkins Park
Plymouth Pillars Park
Madrona Ravine
Freeway Park
Madrona Playground
Madrona Park
MADISON ST
23RD AVE
7TH AVE
BOREN AVE
Leschi-Lake Dell Natural Area
Spruce Street Mini Park
Powell Barnett Park
North Leschi Moorage
Pratt Park
Flo Ware Park
Yesler Terrace Park
10th Ave Hillclimb
Frink Park
Leschi Park And South Moorage
Puget Sound
Dr. Blanche Lavizzo Park
23RD AVE S
Leschi/Frink Park
Judkins Park and Playfield
East Portal Viewpoint
Judge Charles M. Stokes Overlook
South Day Street Park
MERCER ISLAND
0
1
2
Miles
City of Seattle
Urban Growth Areas
Other Cities
Analysis Zones
Public Parks and Open Space
Parks
Playfields and Golf Courses
Greenbelts
Trails
Viewpoints
Map Date: March 2023

Map Date: March 2023



City of Seattle
Urban Growth Areas
Other Cities
Analysis Zones

Public Parks and Open Space

Parks
Playfields and Golf Courses
Greenbelts
Trails
Viewpoints

Map Date: March 2023

City of Seattle
Urban Growth Areas
Other Cities
Analysis Zones

Public Parks and Open Space

Parks
Playfields and Golf Courses
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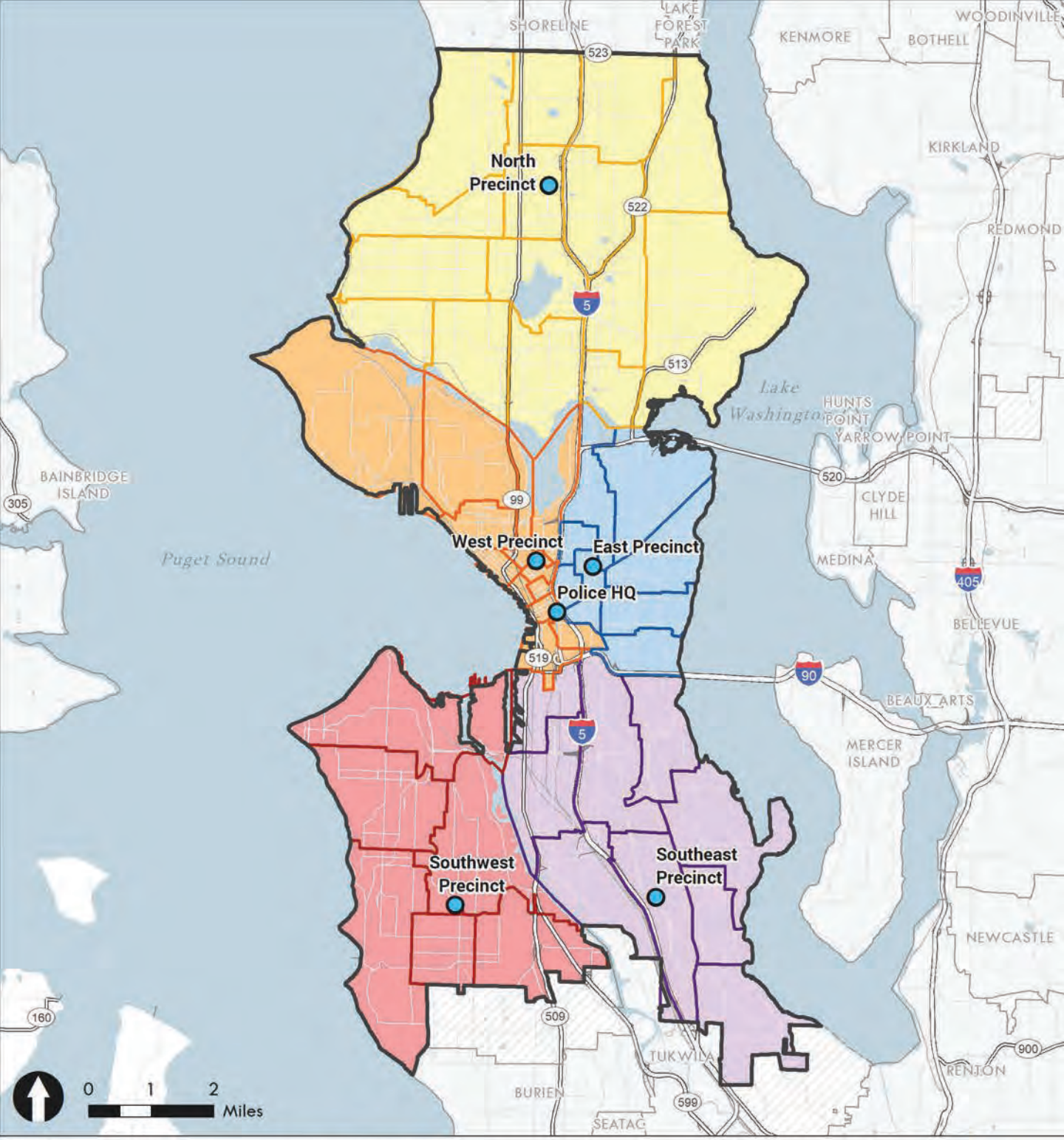
Viewpoints

Map Date: March 2023

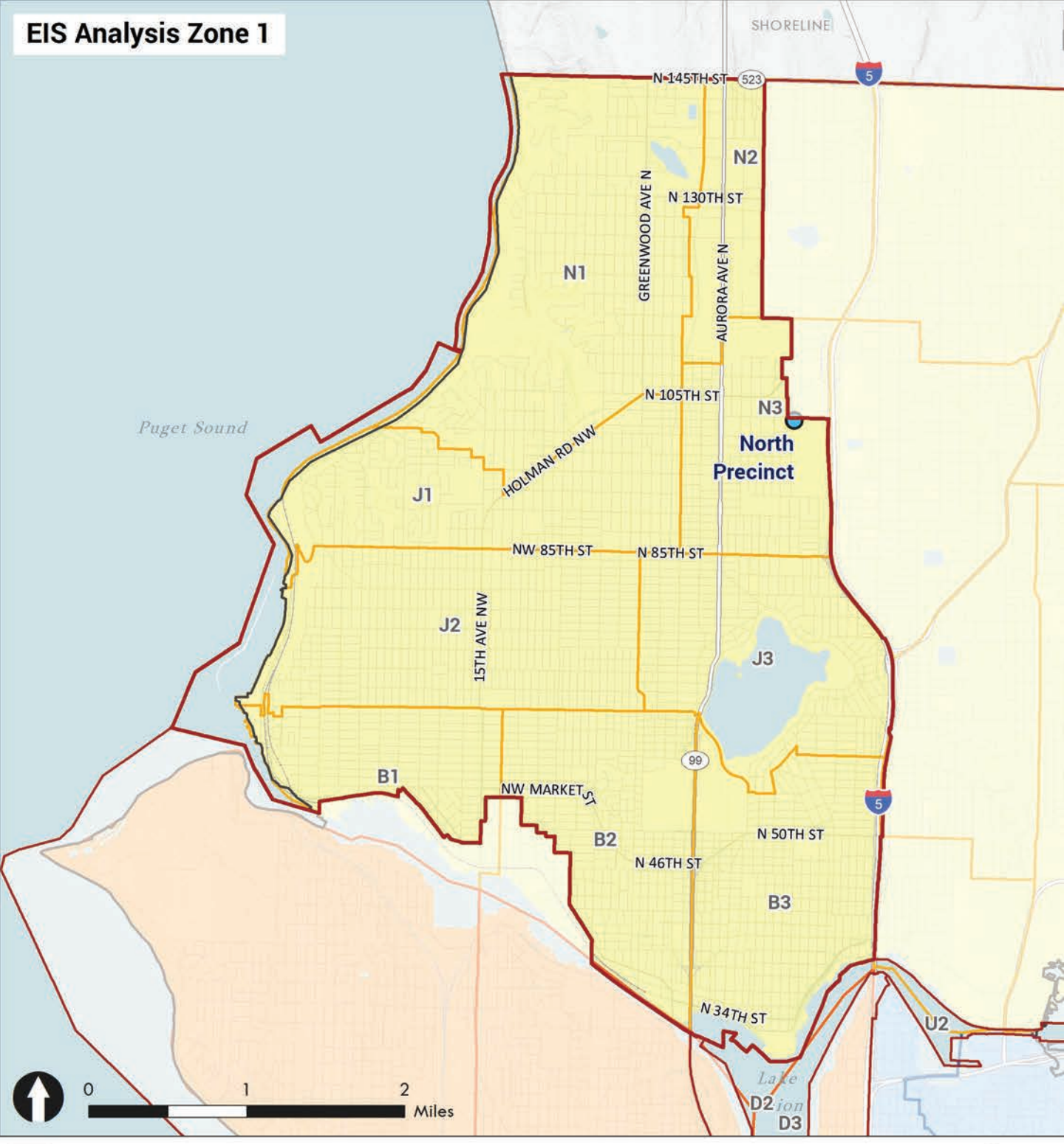


City of Seattle
Urban Growth Areas
Other Cities
Police Stations

Seattle Police Patrol Areas

- North Precinct
- East Precinct
- West Precinct
- South Precinct
- Southwest Precinct

Map Date: March 2023

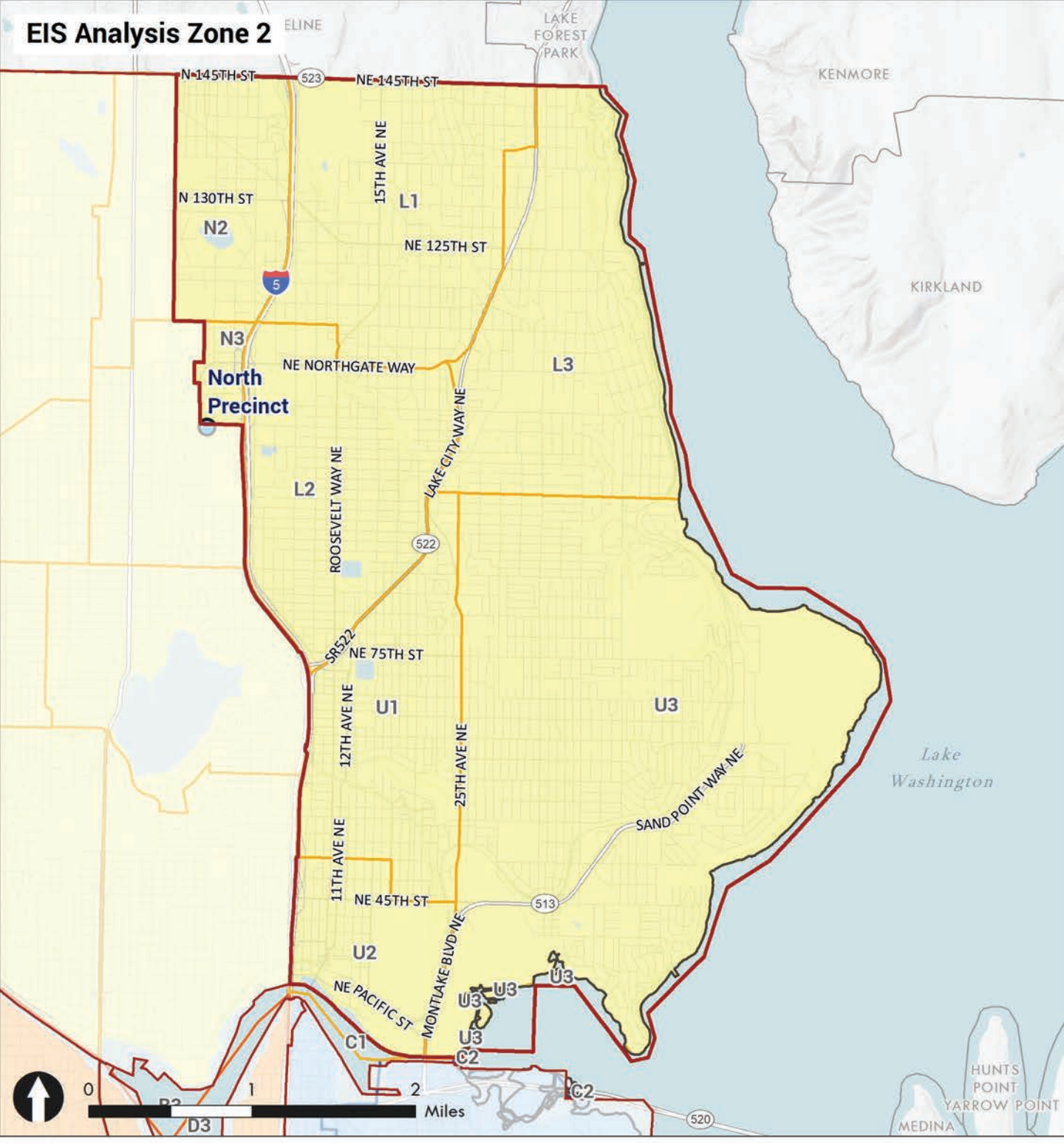


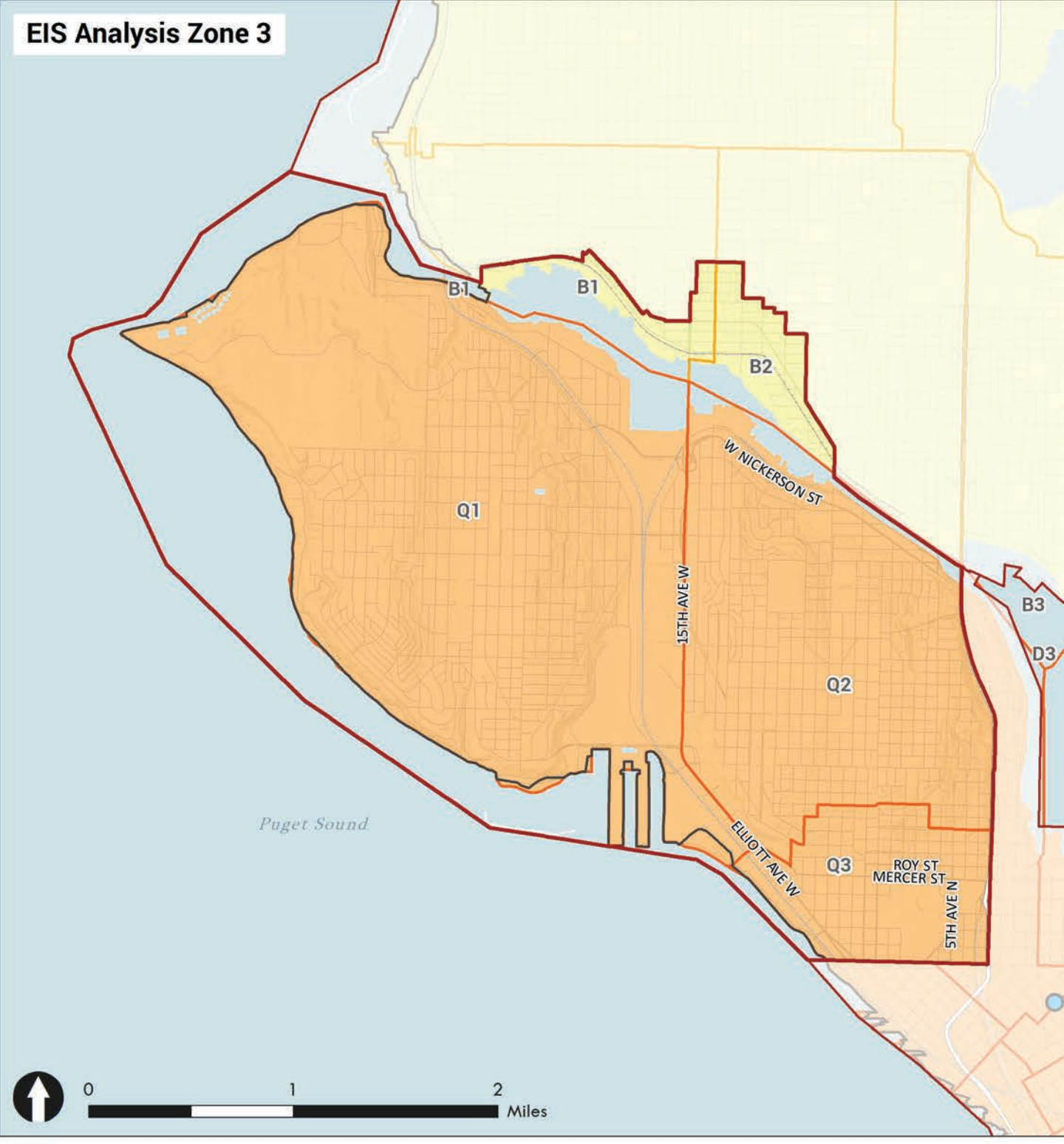
City of Seattle
Urban Growth Areas
Other Cities
Analysis Zones
Police Stations

Seattle Police Patrol Areas

North Precinct
East Precinct
West Precinct
South Precinct
Southwest Precinct

Map Date: March 2023


EIS Analysis Zone 2
LAKE FOREST PARK
KENMORE
KIRKLAND
N 145TH ST
523
NE 145TH ST
15TH AVE NE
N 130TH ST
N2
L1
NE 125TH ST
5
N3
NE NORTHGATE WAY
L3
North Precinct
LAKE CITY WAY NE
L2
ROOSEVELT WAY NE
522
SR522
NE 75TH ST
U1
U3
12TH AVE NE
25TH AVE NE
Lake Washington
SAND POINT WAY NE
11TH AVE NE
NE 45TH ST
513
U2
MONTLAKE BLVD NE
NE PACIFIC ST
U3
C1
C2
HUNTS POINT
YARROW POINT
MEDINA
520
D3
0
1
2
Miles
City of Seattle
Urban Growth Areas
Other Cities
Analysis Zones
Police Stations
Seattle Police Patrol Areas
North Precinct
East Precinct
West Precinct
South Precinct
Southwest Precinct
Map Date: March 2023

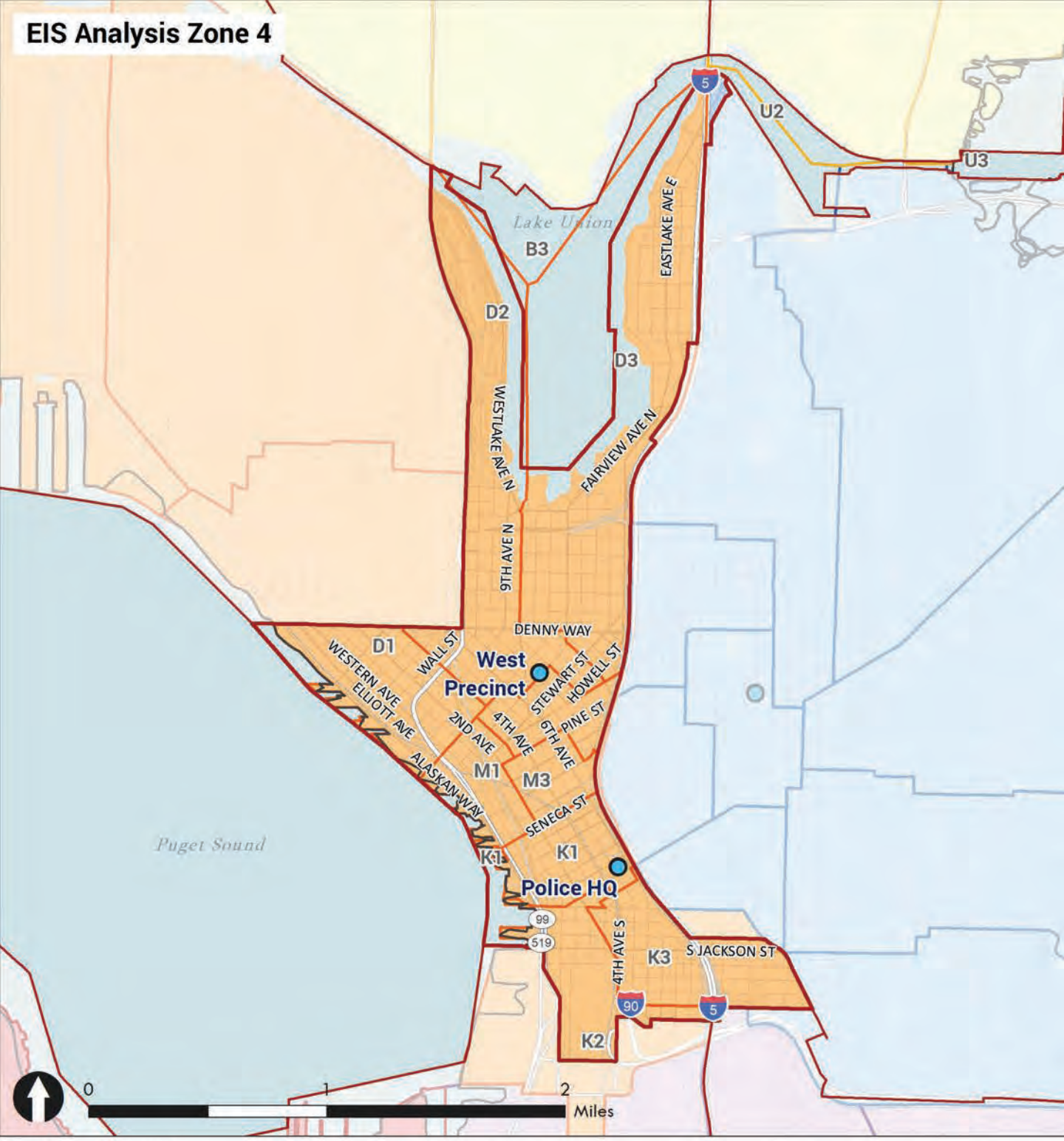


City of Seattle
Urban Growth Areas
Other Cities
Analysis Zones
Police Stations

Seattle Police Patrol Areas

North Precinct
East Precinct
West Precinct
South Precinct
Southwest Precinct

Map Date: March 2023



City of Seattle
Urban Growth Areas
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Seattle Police Patrol Areas

North Precinct
East Precinct
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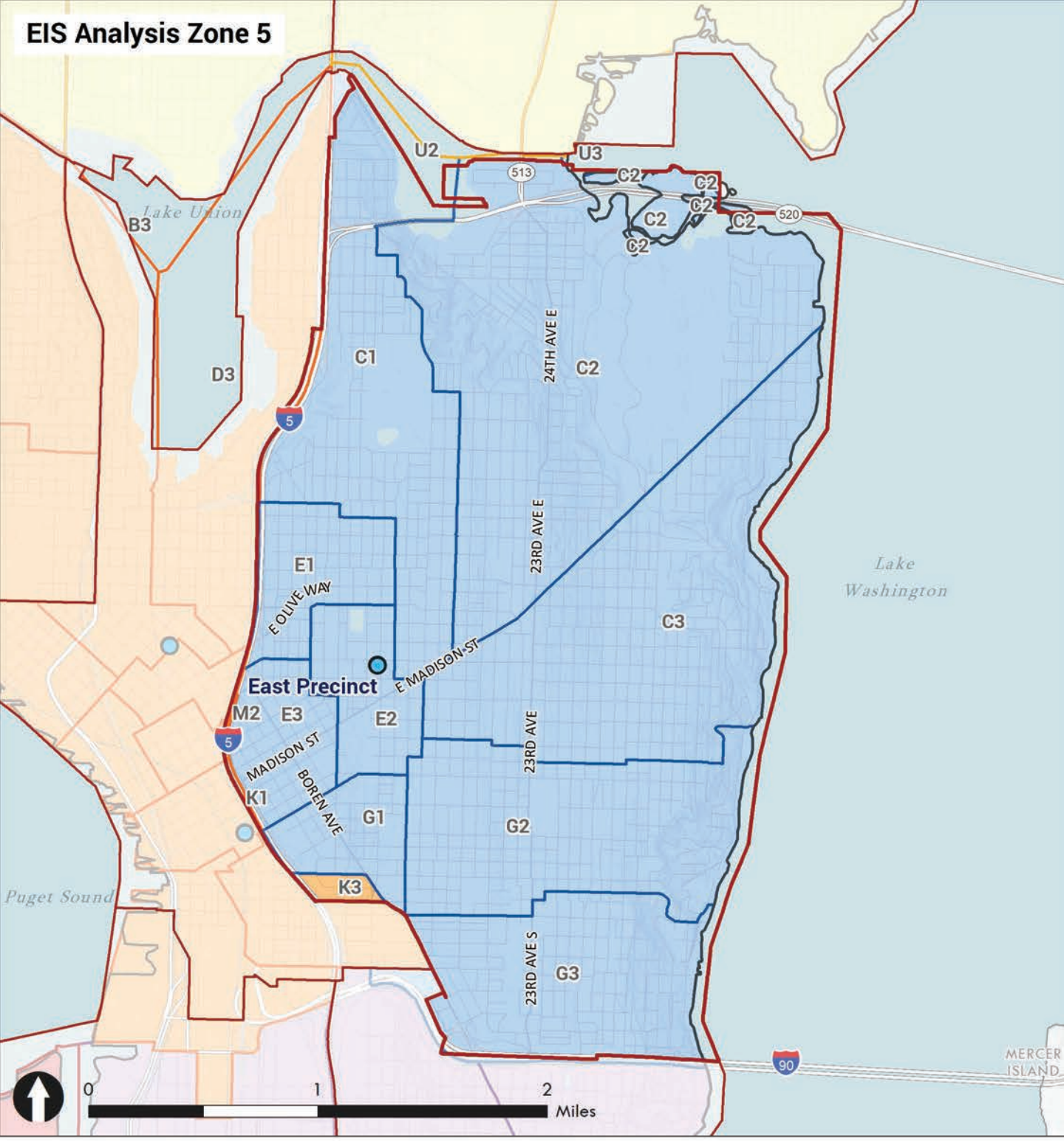
Southwest Precinct

Map Date: March 2023



City of Seattle
Urban Growth Areas
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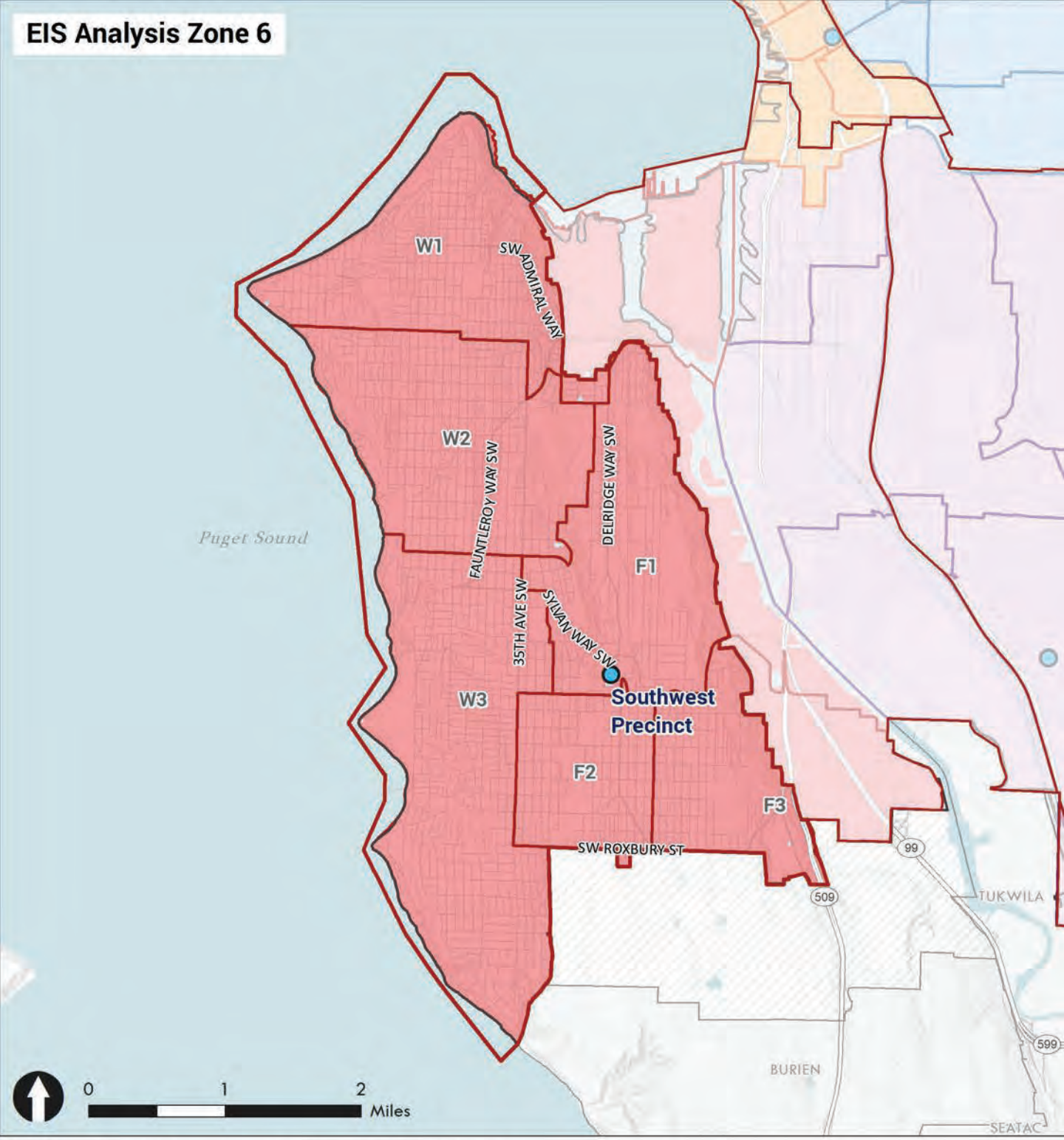
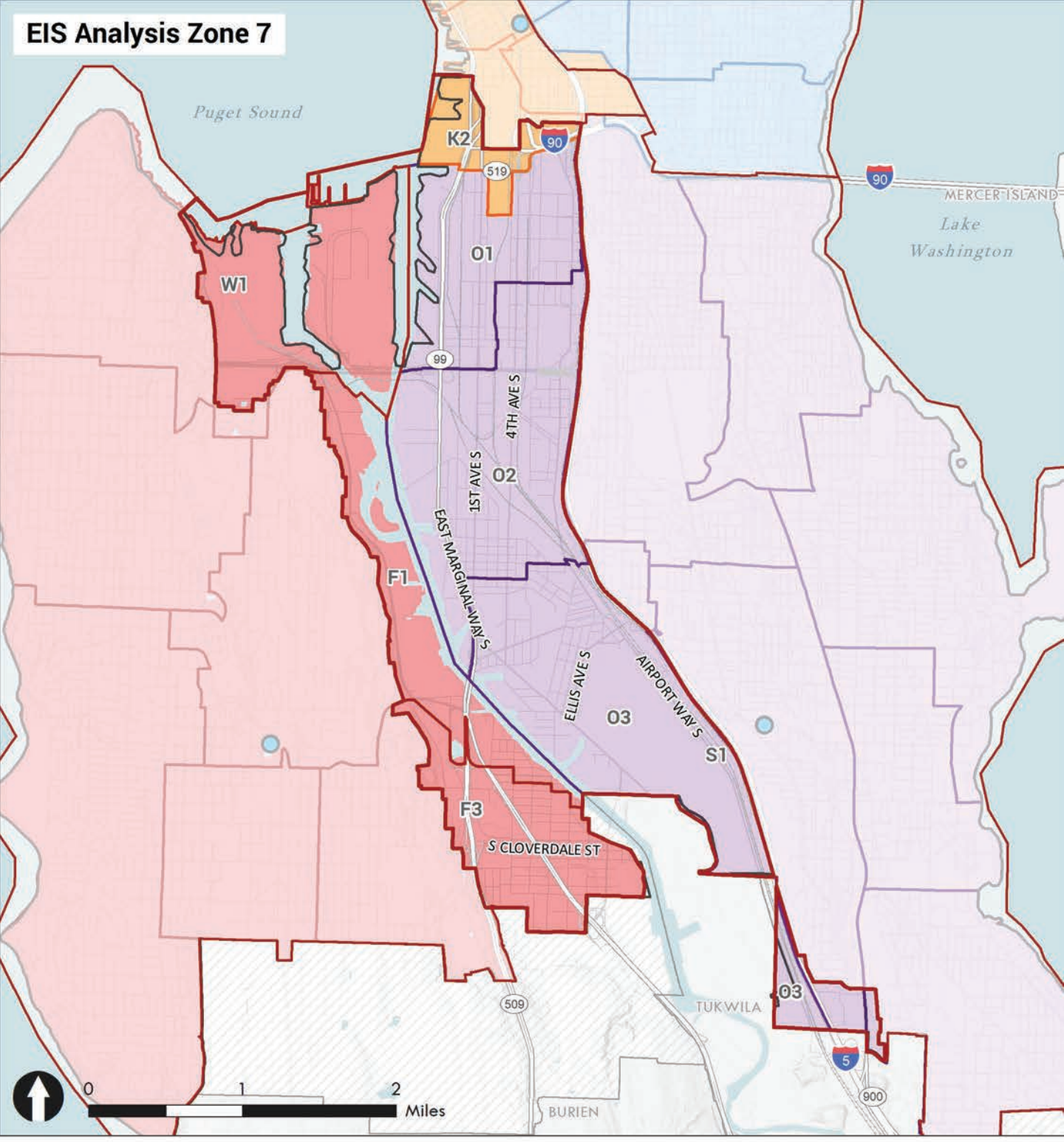
Police Stations

Seattle Police Patrol Areas

North Precinct
East Precinct
West Precinct
South Precinct
Southwest Precinct

Map Date: March 2023


EIS Analysis Zone 6
W1
SW ADMIRAL WAY
W2
FAUNTLEROY WAY SW
DELRIDGE WAY SW
Puget Sound
F1
35TH AVE SW
SYLVAN WAY SW
W3
Southwest Precinct
F2
F3
SW ROXBURY ST
99
509
TUKWILA
599
BURIEN
SEATAC
0
1
2
Miles
City of Seattle
Urban Growth Areas
Other Cities
Analysis Zones
Police Stations
Seattle Police Patrol Areas
North Precinct
East Precinct
West Precinct
South Precinct
Southwest Precinct
Map Date: March 2023

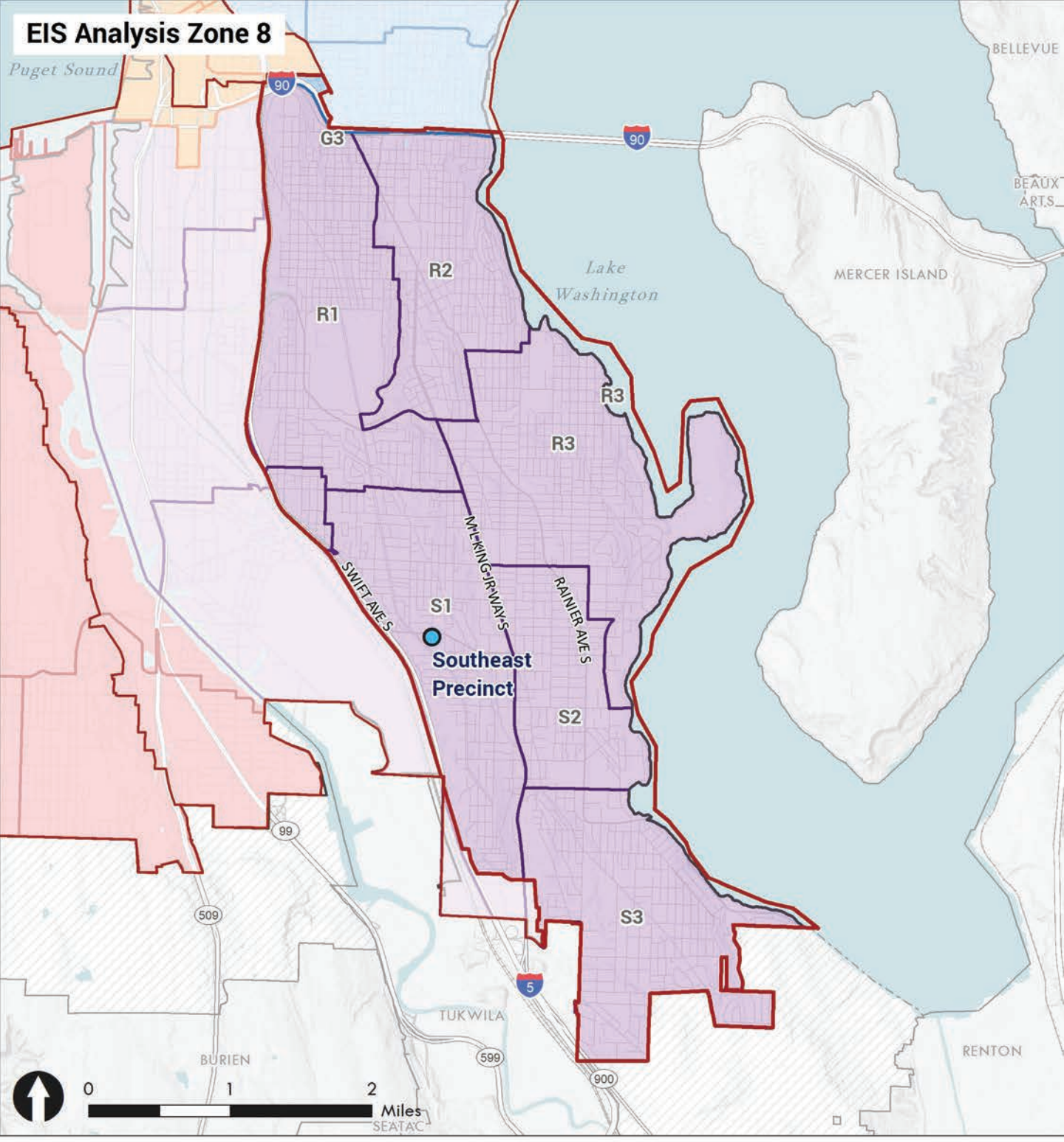


City of Seattle
Urban Growth Areas
Other Cities
Analysis Zones
Police Stations

Seattle Police Patrol Areas

North Precinct
East Precinct
West Precinct
South Precinct
Southwest Precinct

Map Date: March 2023

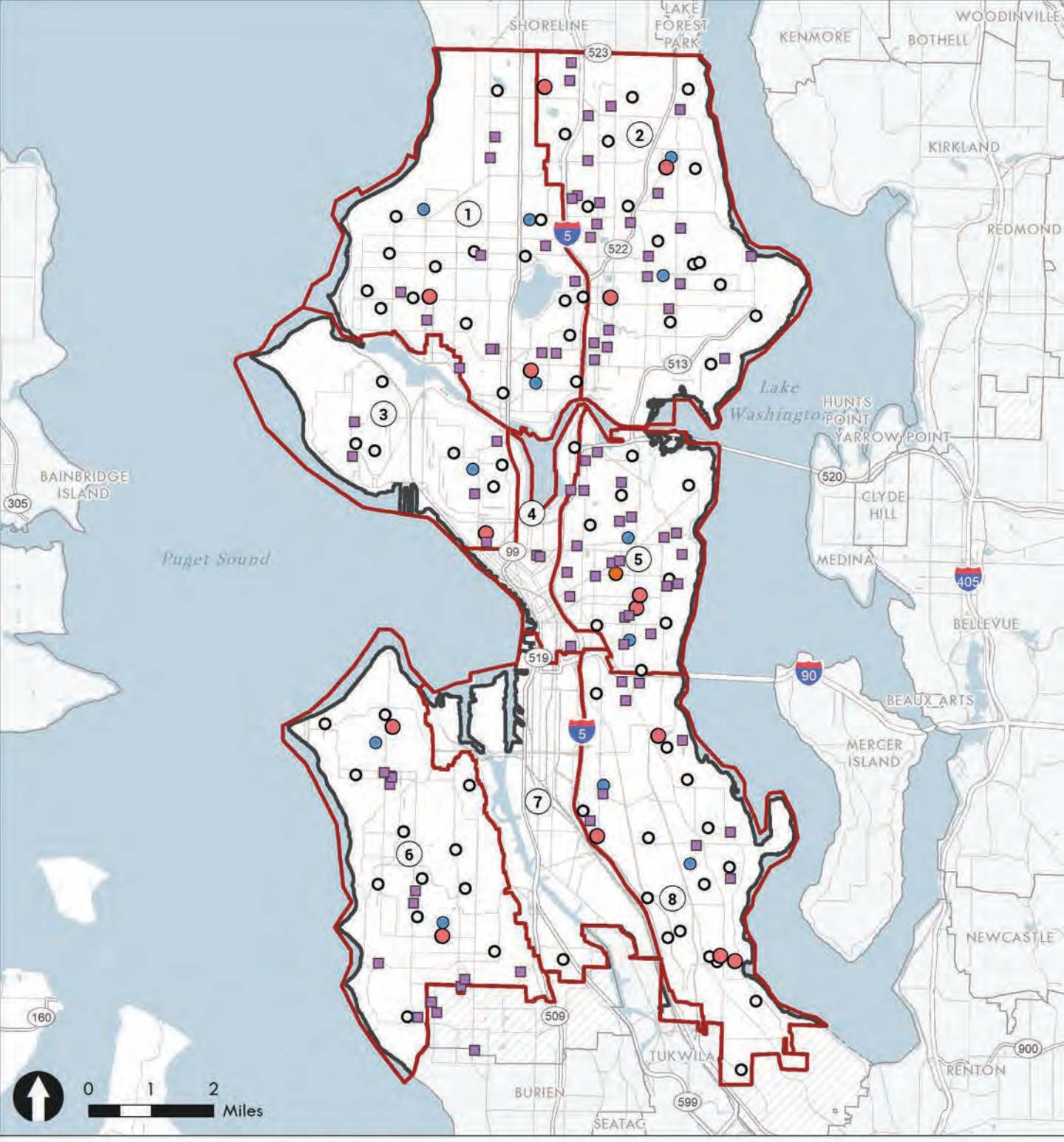


City of Seattle
Urban Growth Areas
Other Cities
Analysis Zones
Police Stations

Seattle Police Patrol Areas

North Precinct
East Precinct
West Precinct
South Precinct
Southwest Precinct

Map Date: March 2023



City of Seattle

Urban Growth Areas

Other Cities

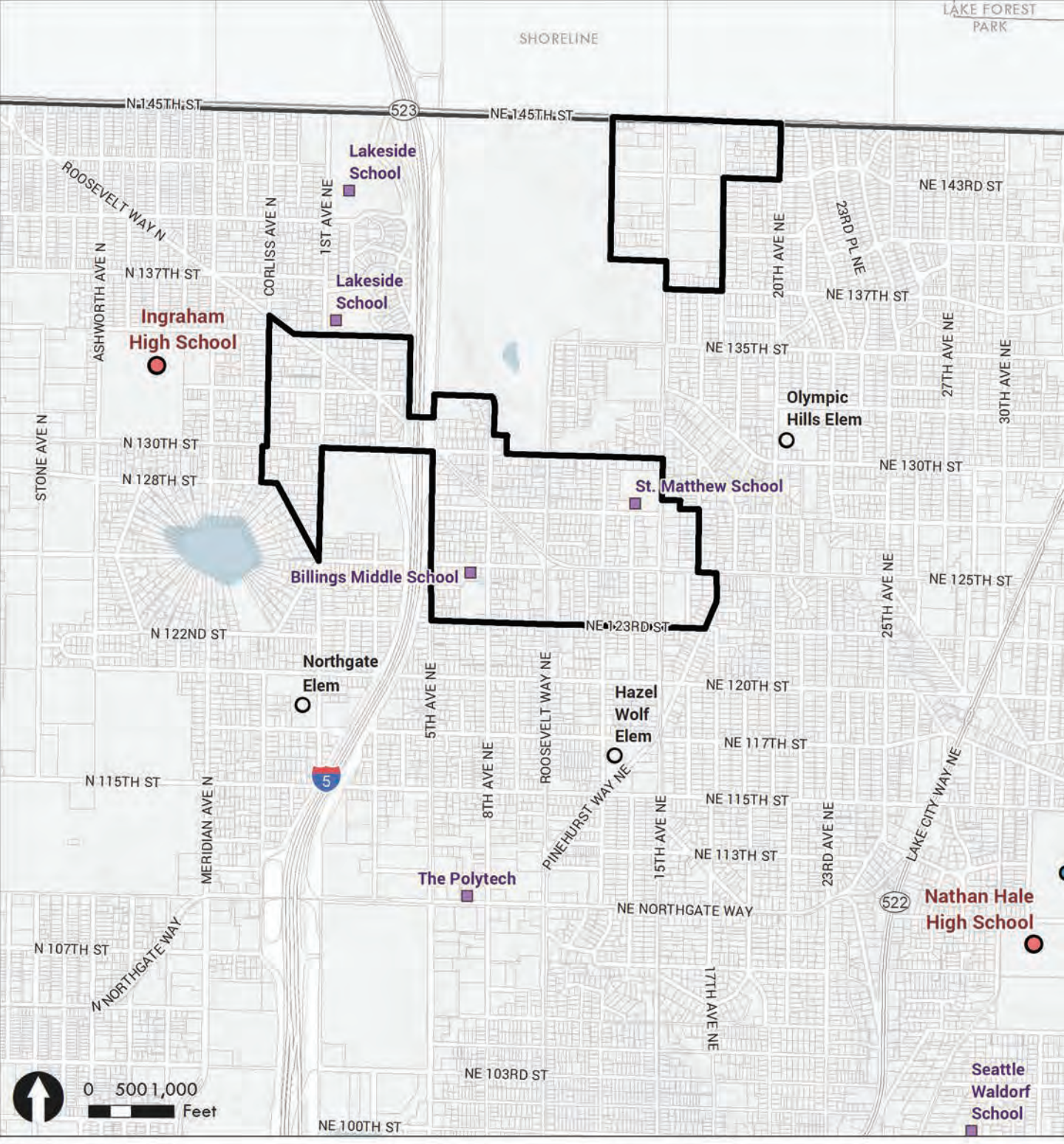
Analysis Zones

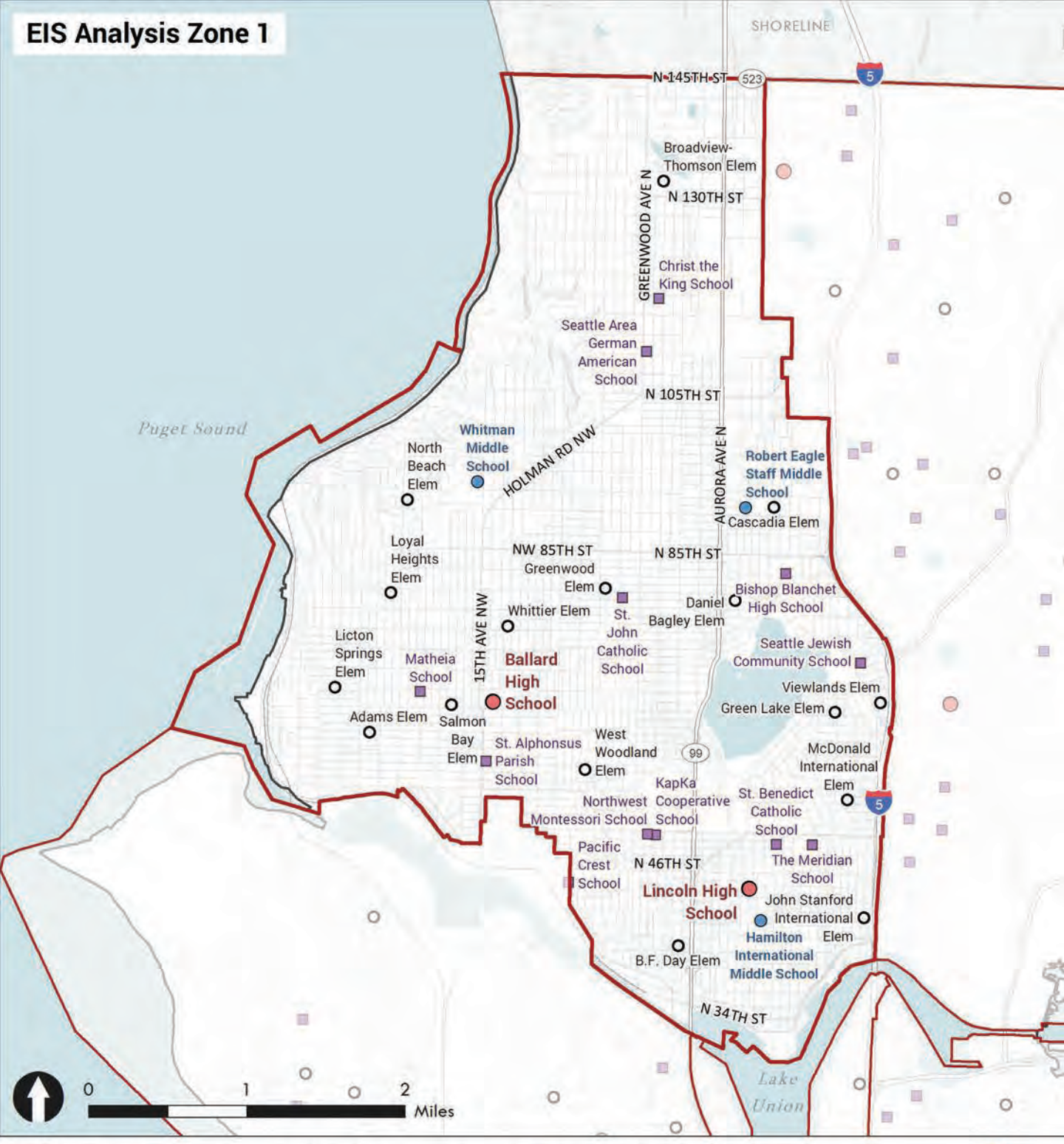
Seattle Public Schools

- Elementary School
- Middle School
- Middle/High School
- High School

Private School

Map Date: March 2023


SHORELINE
LAKE FOREST PARK
N 145TH ST
523
NE 145TH ST
Lakeside School
ROOSEVELT WAY N
1ST AVE NE
CORLISS AVE N
ASHWORTH AVE N
N 137TH ST
Lakeside School
Ingraham High School
NE 143RD ST
20TH AVE NE
23RD PL NE
NE 137TH ST
NE 135TH ST
27TH AVE NE
30TH AVE NE
Olympic Hills Elem
STONE AVE N
N 130TH ST
N 128TH ST
NE 130TH ST
St. Matthew School
Billings Middle School
NE 125TH ST
25TH AVE NE
NE 123RD ST
N 122ND ST
Northgate Elem
5TH AVE NE
ROOSEVELT WAY NE
Hazel Wolf Elem
NE 120TH ST
NE 117TH ST
N 115TH ST
5
8TH AVE NE
PINEHURST WAY NE
15TH AVE NE
NE 115TH ST
23RD AVE NE
LAKE CITY WAY NE
MERIDIAN AVE N
NE 113TH ST
The Polytech
522
Nathan Hale High School
NE NORTHGATE WAY
N 107TH ST
N NORTHGATE WAY
17TH AVE NE
NE 103RD ST
Seattle Waldorf School
NE 100TH ST
0 500 1,000
Feet
City of Seattle
Urban Growth Areas
Other Cities
130th/145th Station Areas
Seattle Public Schools
Elementary School
Middle School
Middle/High School
High School
Private School
Map Date:
2444



City of Seattle

Urban Growth Areas

Other Cities

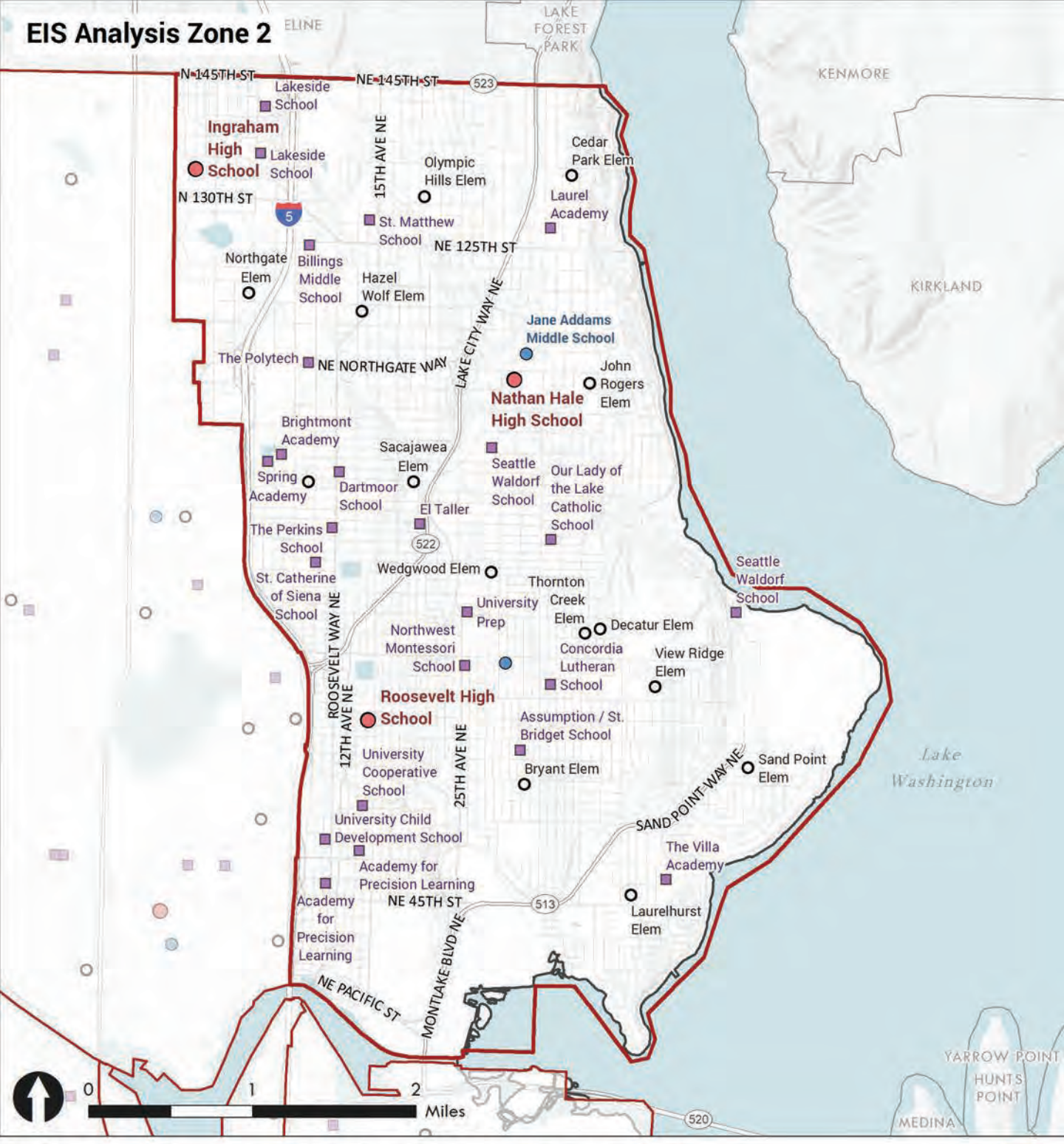
Analysis Zones

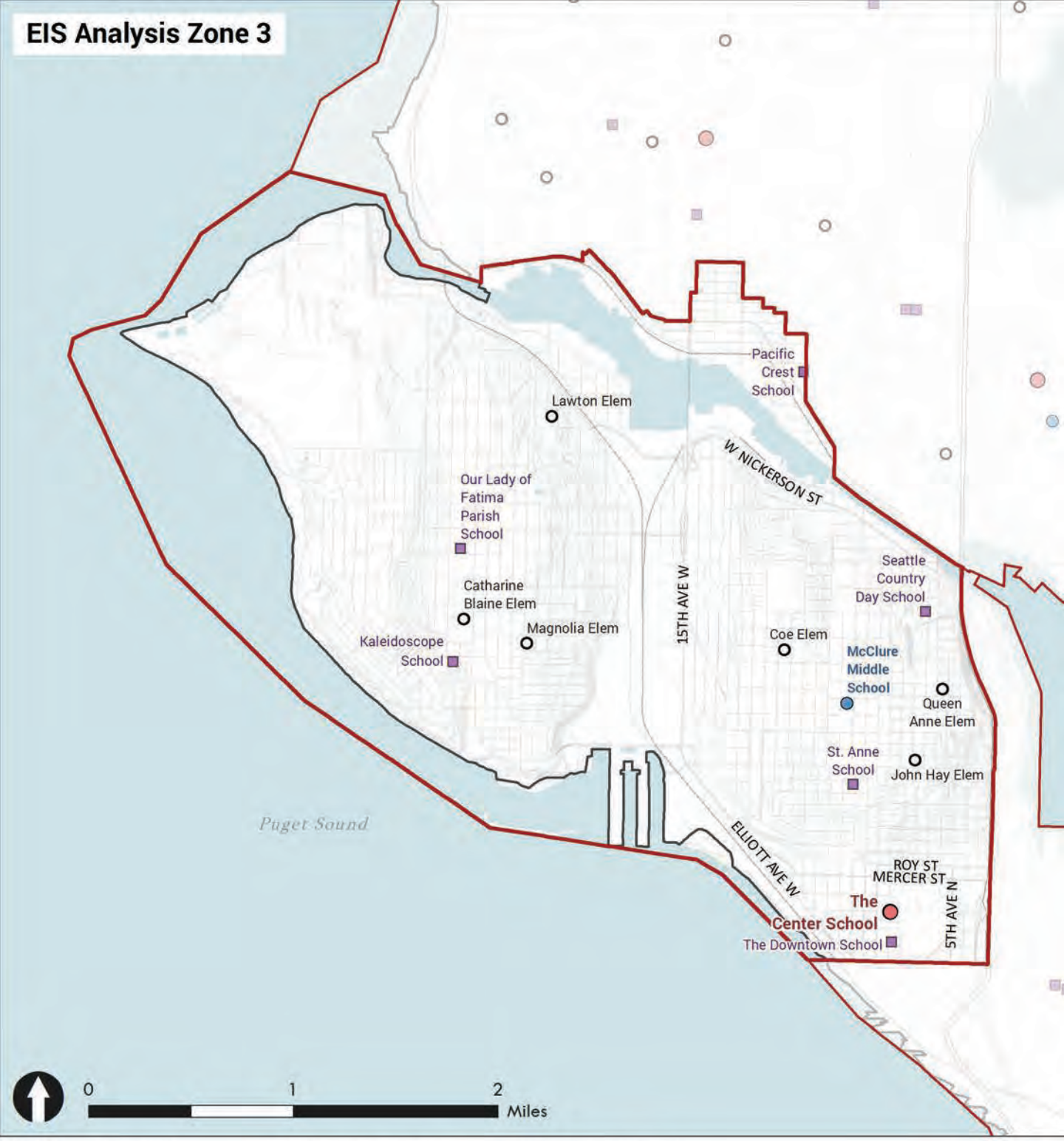
Seattle Public Schools

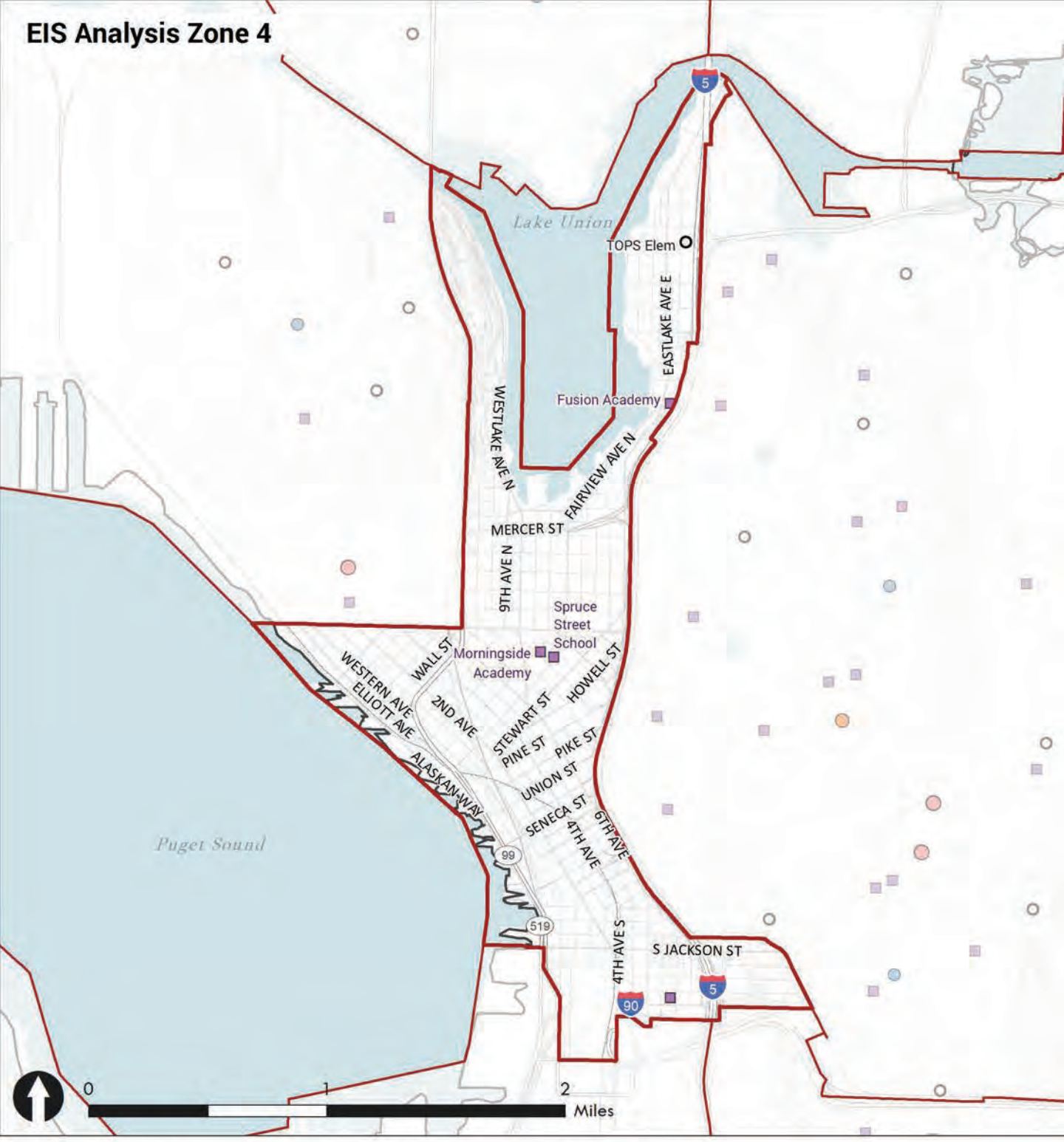
- Elementary School
- Middle School
- Middle/High School
- High School

Private School

Map Date: March 2023


EIS Analysis Zone 2
ELINE
LAKE FOREST PARK
KENMORE
KIRKLAND
N 145TH ST
NE 145TH ST
523
Lakeside School
Ingraham High School
Lakeside School
15TH AVE NE
Olympic Hills Elem
Cedar Park Elem
Laurel Academy
N 130TH ST
5
St. Matthew School
NE 125TH ST
Northgate Elem
Billings Middle School
Hazel Wolf Elem
LAKE CITY WAY NE
Jane Addams Middle School
The Polytech
NE NORTHGATE WAY
John Rogers Elem
Nathan Hale High School
Brightmont Academy
Spring Academy
Sacajawea Elem
Dartmoor School
Seattle Waldorf School
Our Lady of the Lake Catholic School
El Taller
The Perkins School
522
Wedgwood Elem
St. Catherine of Siena School
Thornton Creek Elem
University Prep
Seattle Waldorf School
Decatur Elem
ROOSEVELT WAY NE
Northwest Montessori School
Concordia Lutheran School
View Ridge Elem
12TH AVE NE
Roosevelt High School
Assumption / St. Bridget School
25TH AVE NE
University Cooperative School
Bryant Elem
Sand Point Elem
SAND POINT WAY NE
Lake Washington
University Child Development School
The Villa Academy
Academy for Precision Learning
NE 45TH ST
513
Academy for Precision Learning
Laurelhurst Elem
MONTLAKE BLVD NE
NE PACIFIC ST
YARROW POINT
HUNTS POINT
MEDINA
520
0
1
2
Miles
City of Seattle
Urban Growth Areas
Other Cities
Analysis Zones
Seattle Public Schools
Elementary School
Middle School
Middle/High School
High School
Private School
Map Date: March 2023


EIS Analysis Zone 3
Pacific Crest School
Lawton Elem
W NICKERSON ST
Our Lady of Fatima Parish School
Seattle Country Day School
Catharine Blaine Elem
15TH AVE W
Magnolia Elem
Kaleidoscope School
Coe Elem
McClure Middle School
Queen Anne Elem
St. Anne School
John Hay Elem
Puget Sound
ELLIOTT AVE W
ROY ST
MERCER ST
The Center School
The Downtown School
5TH AVE N
0
1
2
Miles
City of Seattle
Urban Growth Areas
Other Cities
Analysis Zones
Seattle Public Schools
Elementary School
Middle School
Middle/High School
High School
Private School
Map Date: March 2023



City of Seattle

Urban Growth Areas

Other Cities

Analysis Zones

Seattle Public Schools

Elementary School

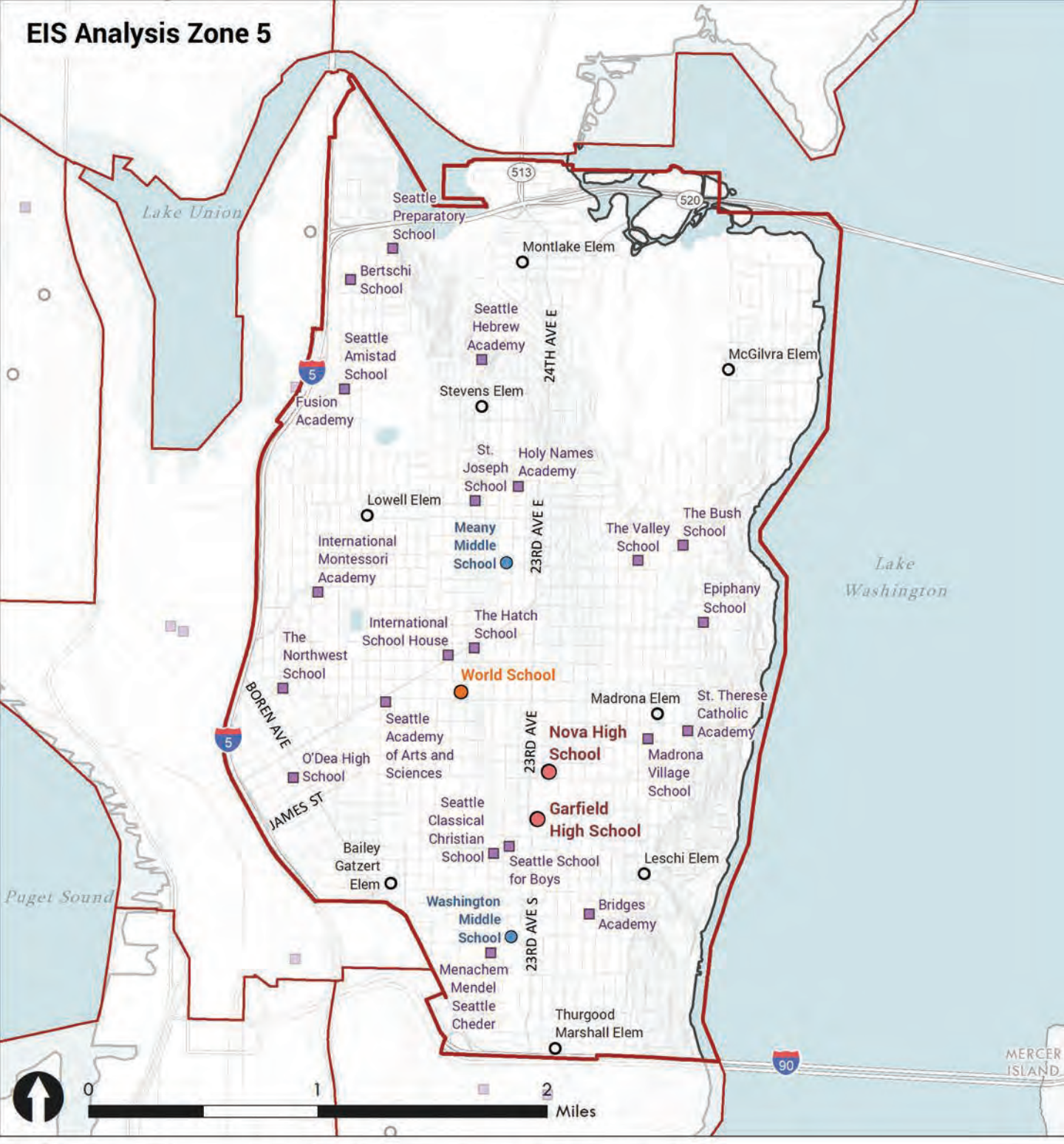
Middle School

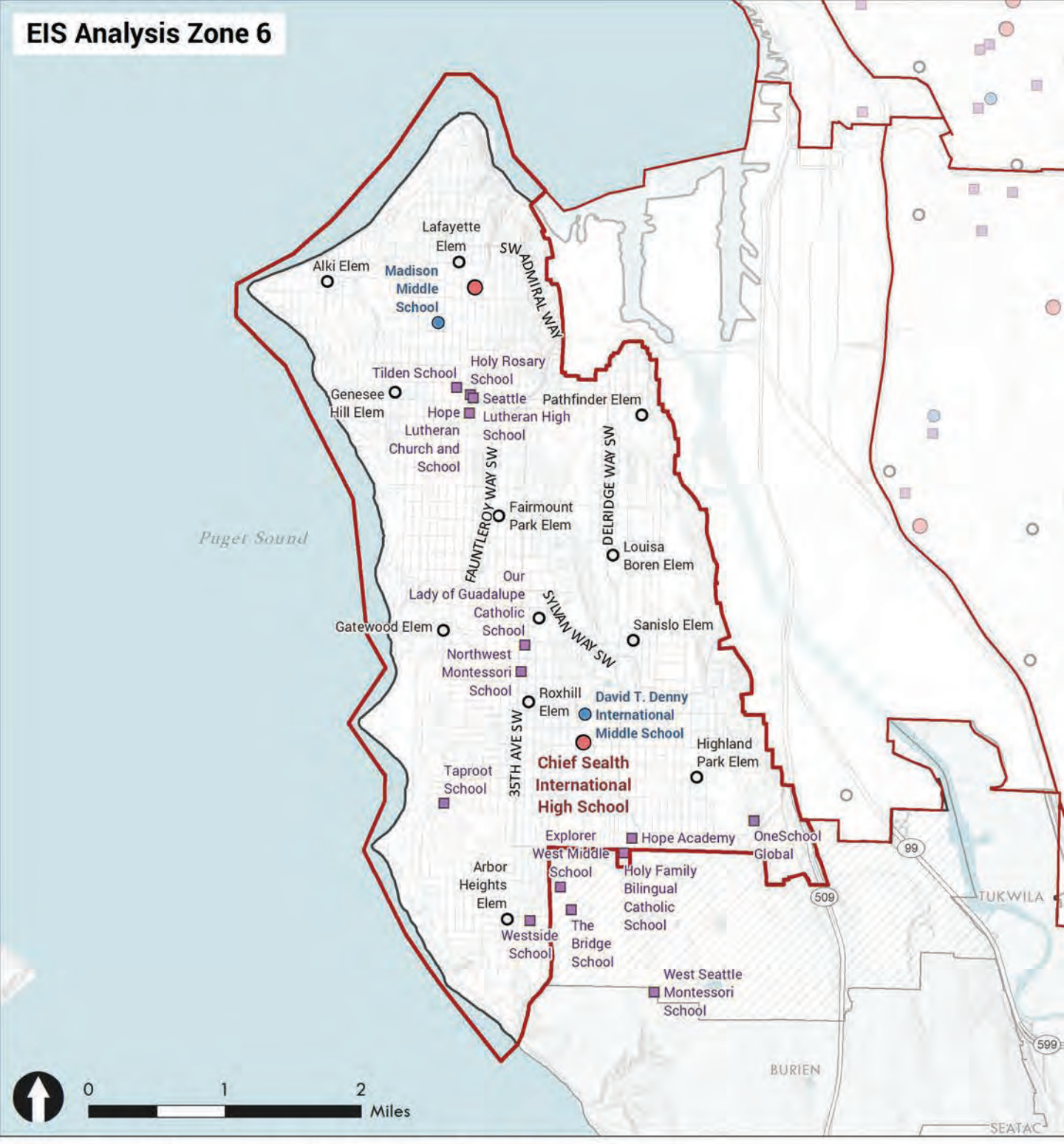
Middle/High School

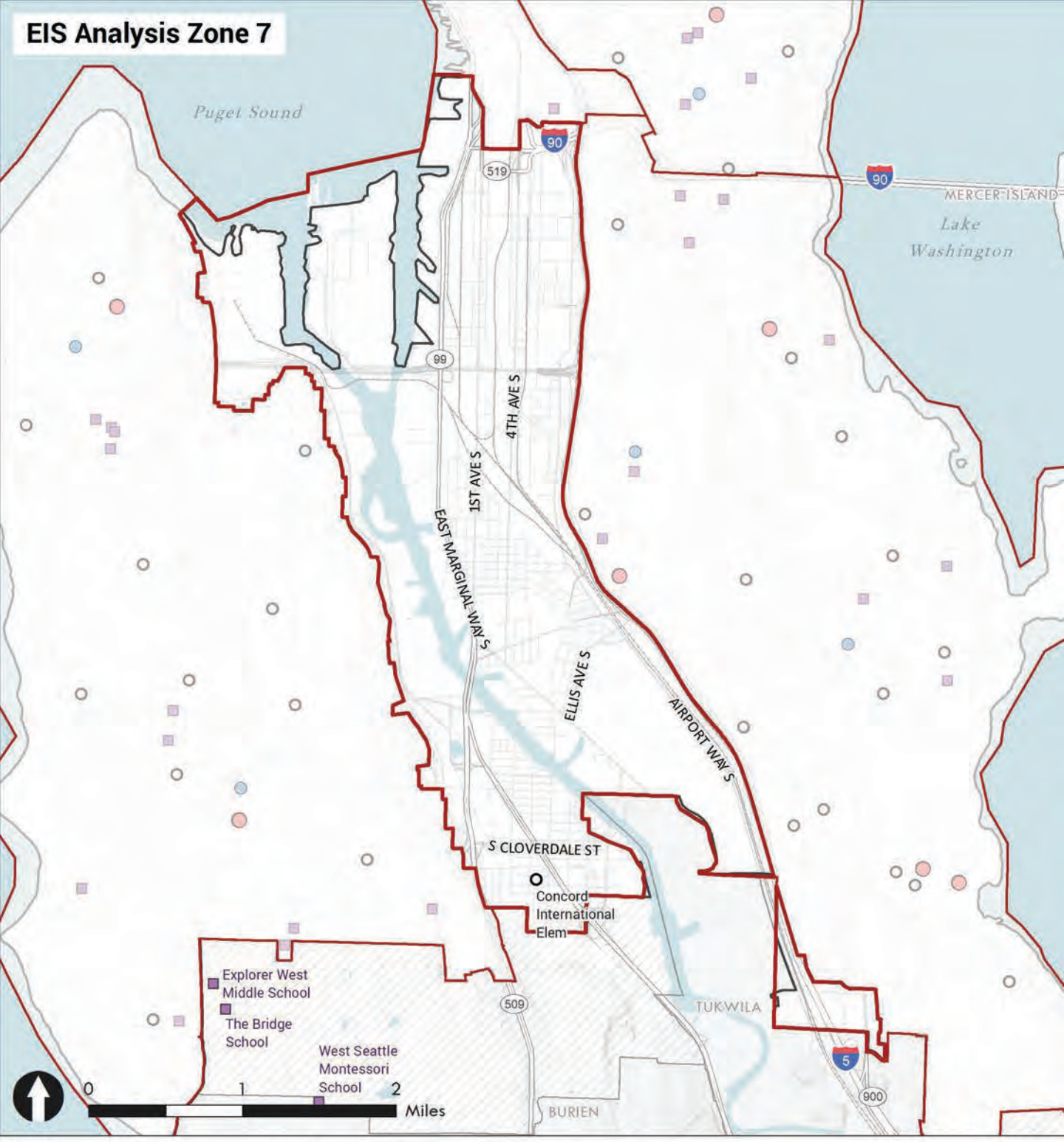
High School

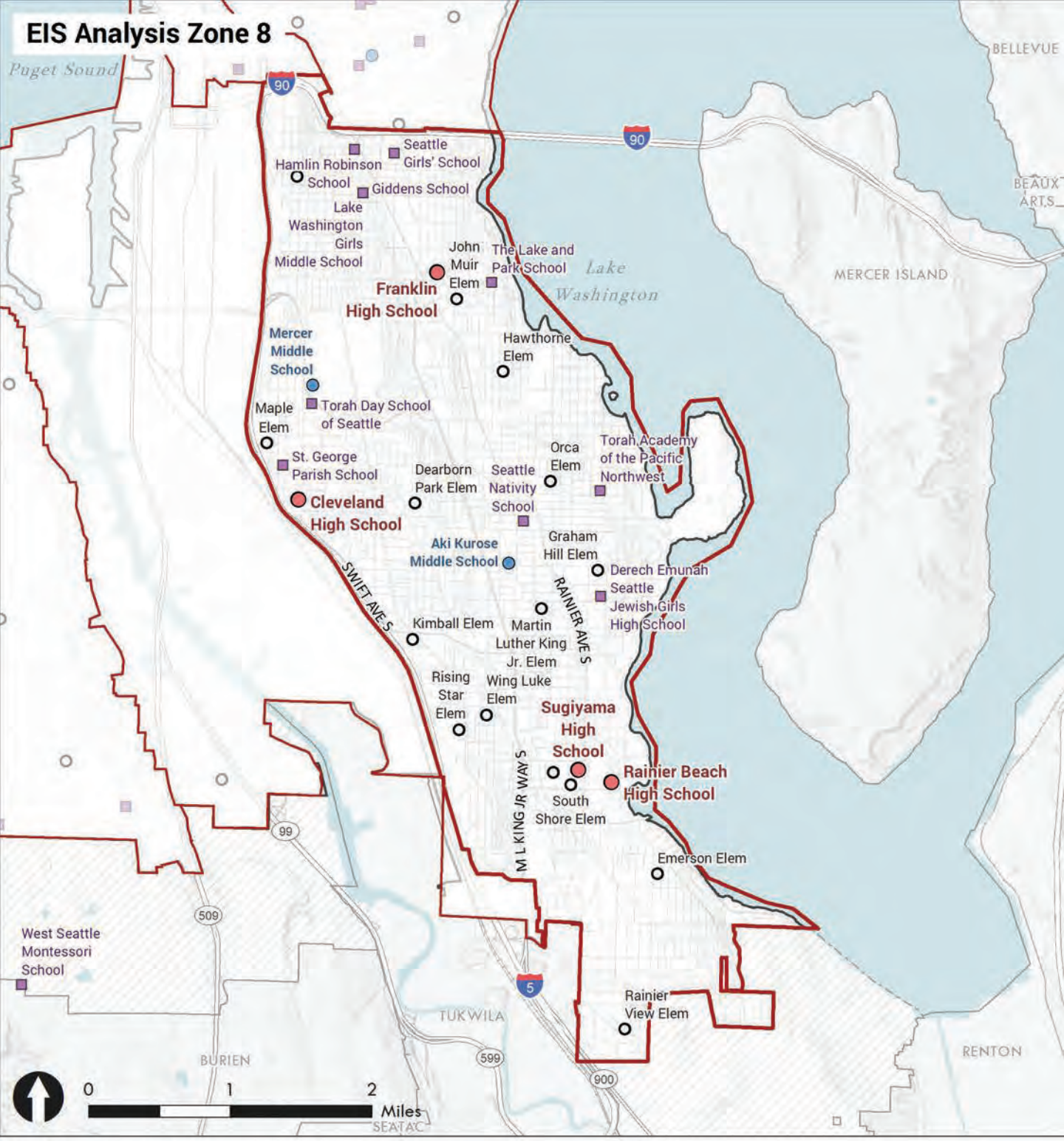
Private School

Map Date: March 2023


EIS Analysis Zone 5
Lake Union
Lake Washington
Puget Sound
513
520
5
90
Seattle Preparatory School
Montlake Elem
Bertschi School
Seattle Hebrew Academy
24TH AVE E
Seattle Amistad School
McGilvra Elem
Fusion Academy
Stevens Elem
St. Joseph School
Holy Names Academy
Lowell Elem
23RD AVE E
Meany Middle School
The Valley School
The Bush School
International Montessori Academy
Epiphany School
International School House
The Hatch School
The Northwest School
World School
BOREN AVE
Madrona Elem
St. Therese Catholic Academy
Seattle Academy of Arts and Sciences
23RD AVE
Nova High School
Madrona Village School
O'Dea High School
JAMES ST
Seattle Classical Christian School
Garfield High School
Bailey Gatzert Elem
Seattle School for Boys
Leschi Elem
Washington Middle School
23RD AVE S
Bridges Academy
Menachem Mendel Seattle Cheder
Thurgood Marshall Elem
MERCER ISLAND
0
1
2
Miles
City of Seattle
Urban Growth Areas
Other Cities
Analysis Zones
Seattle Public Schools
Elementary School
Middle School
Middle/High School
High School
Private School
Map Date: March 2023


EIS Analysis Zone 6
Lafayette Elem
Alki Elem
Madison Middle School
SW ADMIRAL WAY
Tilden School
Holy Rosary School
Genesee Hill Elem
Seattle Lutheran High School
Hope Lutheran Church and School
Pathfinder Elem
FAUNTLEROY WAY SW
DELRIDGE WAY SW
Fairmount Park Elem
Puget Sound
Louisa Boren Elem
Our Lady of Guadalupe Catholic School
SYLVAN WAY SW
Gatewood Elem
Sanislo Elem
Northwest Montessori School
Roxhill Elem
David T. Denny International Middle School
35TH AVE SW
Chief Sealth International High School
Highland Park Elem
Taproot School
Explorer West Middle School
Hope Academy
OneSchool Global
Arbor Heights Elem
Holy Family Bilingual Catholic School
Westside School
The Bridge School
West Seattle Montessori School
99
509
TUKWILA
599
BURIEN
SEATAC
0
1
2
Miles
City of Seattle
Urban Growth Areas
Other Cities
Analysis Zones
Seattle Public Schools
Elementary School
Middle School
Middle/High School
High School
Private School
Map Date: March 2023


EIS Analysis Zone 7
Puget Sound
Lake Washington
MERCER ISLAND
90
519
99
4TH AVE S
1ST AVE S
EAST MARGINAL WAY S
ELLIS AVE S
AIRPORT WAY S
S CLOVERDALE ST
Concord International Elem
Explorer West Middle School
The Bridge School
West Seattle Montessori School
509
TUKWILA
5
900
BURIEN
0
1
2
Miles
City of Seattle
Urban Growth Areas
Other Cities
Analysis Zones
Seattle Public Schools
Elementary School
Middle School
Middle/High School
High School
Private School
Map Date: March 2023



City of Seattle
Urban Growth Areas
Other Cities
Analysis Zones

Seattle Public Schools

- Elementary School
- Middle School
- Middle/High School
- High School

Private School

Map Date: March 2023

J Proposed Legislation

J.1 Summary Zoning Tables
J.2 One Seattle Plan Zoning Update Phase 1 Ordinance Draft

J.1 Summary Zoning Tables

Neighborhood Residential Zone Dimensional Standards

Summary of Development Standards	
Maximum density	1 unit per 1,250 square feet of lot area except that, consistent with state law, at least four units are allowed on all lots, regardless of lot size, and six units within a quarter-mile walk of major transit or if two units are affordable.
Floor area ratio (FAR)	0.6 FAR for density below 1/4,000 sq ft (e.g., one unit on a 5,000 sq ft lot)
	0.8 FAR for density between 1/4,000 and 1/2,200 sq ft (e.g., two units on a 5,000 sq ft lot)
	1.0 FAR for density between 1/2,200 and 1/1,600 sq ft (e.g., three units on a 5,000 sq ft lot)
	For density of at least 1 unit per 1,600 sq ft (e.g., four units on a 5,000 sq ft lot):
	1.2 FAR for attached and detached dwelling units
	1.4 FAR for stacked dwelling units
Lot coverage	50 percent
Height limit	3 stories for market-rate development
	4 stories for development with income-restricted affordable homes
Minimum open space requirement	20 percent of lot area
	The minimum dimension for usable open space is 8 feet or, if the open space includes a circulation pathway serving multiple buildings, 11 feet
	Open space may be private or shared
	At least half of the open space must be at ground level. Only half of open space not at ground level counts toward this requirement.
Minimum setbacks and separations	Front: 10 feet
	Rear: 10 feet without an alley, 5 feet for ADUs, and zero feet with an alley
	Side: 5 feet
	Separation between buildings within property: 6 feet

Summary of Development Standards	
	Covered porches may extend up to 6 feet into setback, with up to 100 sq ft per porch allowed in setback
	Bay windows and balconies may extend up to 2 feet into setback if limited to 8 f

Lowrise Zone Dimensional Standards

Low Rise Zones	Lowrise 1	Lowrise 2	Lowrise 3
Height	32 feet (3 stories)	40 feet (4 stories)	50 feet inside and outside centers (5 stories)
Floor area ratio (FAR)	1.3 for attached and detached homes 1.5 for stacked flats	1.4 for attached and detached homes 1.6-1.8 for stacked flats	2.3 inside and outside centers
Density	1 unit per 1,150 square feet of lot area except where state law requires higher density	none	none
Front setback	7 feet average, 5 feet minimum		
Rear setback	7 feet average, 5 feet minimum, 0 feet if there is an alley		
Side setback	5 feet		
Amenity area	20% of lot area, at least 50% must be at ground level		

Midrise Zone Dimensional Standards

	Midrise 1 (new zone)	Midrise 2 (currently called Midrise)
Height	65 feet (6 stories)	85 feet (7-8 stories)
Floor area ratio (FAR)	3.2	4.5
Density	none	none
Front setback	7 feet average, 5 feet minimum With exemption for projects with large courtyard	
Rear setback	10 feet **or** 0 feet **with** an alley	
Side setback	5 feet	
Amenity area	5 percent of the total floor area	
Likely outcomes	6-story apartments or condos	7- or 8-story apartments or condos

One Seattle Plan Zoning Update "Phase 1" Legislation

Summary and Text

Public Review Draft

This document contains a summary of the draft phase 1 legislation as well as the full text of the draft.

SUMMARY

Overview

The One Seattle Plan Zoning Update Phase 1 legislation would make the following changes to implement Seattle's new Comprehensive Plan, the One Seattle Plan:

- update the development standards for Neighborhood Residential zones
- implement changes to comply with various 2025 state deadlines including those related to HB 1110 (Middle Housing), HB 1337 (Accessory Dwelling Units), HB 1293 (Design Standards), and SB 6015 (Parking Reform)
- make minor changes to clarify existing rules and seek consistency between zones

Background

The City of Seattle has been working since 2022 to update our Comprehensive Plan. We are calling the updated plan the One Seattle Plan. The Plan is a roadmap for where and how Seattle will grow and invest in communities over the next 20 years, toward becoming a more equitable, livable, sustainable, and resilient city.

In 2023, the Washington State legislature passed a suite of bills that were intended to increase the production of housing and address our housing affordability crisis. These bills include:

- HB 1110 (also known as the "Middle Housing bill") which requires cities to allow 4 to 6 units on residentially-zoned lots and a wider variety of housing types such as duplex, triplexes, and stacked flats as well as placing limits on the regulation of middle housing
- HB 1337 which places limits on the regulation of accessory dwelling units
- HB 1293 which places limits on design review processes and requires that design standards be "clear and objective"

- SB 6015 which places limits on requirements for off-street parking

In March 2024, the City released a Draft One Seattle Plan, including a draft growth strategy. Following this release, the City conducted three months of public engagement, including eight open houses, and received more than 6,000 comments. In October 2024, the City released the Mayor Recommended Growth Strategy. This Growth Strategy will be transmitted to City Council in December 2024 for review and adoption as part of the Mayor's Recommended One Seattle Plan.

The City is now working to implementing the Mayor's Recommended growth strategy through changes to zoning and development standards. This work will also ensure Seattle complies with the new state requirements. We are looking for feedback on a draft proposal for implementing both Phase 1 and Phase 2 changes through December 20, 2024. Revised Phase 1 legislation would then be transmitted to City Council in March of 2025. Revised Phase 2 legislation would be transmitted to City Council in May of 2025 and reviewed by City Council after Phase 1 legislation is passed.

Summary of Legislation

This legislation would make the following changes to existing code:

Changes to **Neighborhood Residential** Zones

This legislation would repeal Seattle Municipal Code Chapter 23.44, which contains the development standards for Neighborhood Residential zones, and replace it with new Chapter 23.44. The proposed changes are described in detail in the Updating Seattle's Neighborhood Residential Zones document, which is available at zoning.OneSeattlePlan.com, and are summarized below:

- Update development standards for Neighborhood Residential zones to allow a greater diversity of housing options consistent with new state requirements in HB 1110 as follows:

Density	Implement new density requirement of 1 unit per 1,250 square feet except where higher densities are required by state law; accessory dwelling units would count toward density
Minimum lot size	Reduce from 5,000-9,600 sq ft (depending on zone) to 1,250 sq ft (consistent with 4 units on 5,000 sq ft lot)
FAR	Shift from range of 0.6-1.0 to 0.6-1.2 depending on number of units; the updated approach would be consistent with state's suggested "model code"

Front setback	Reduce from an average of front setbacks for adjacent homes (but never more than 20 and never less than 10 feet) to 10 feet
Rear setback	Reduce from 25% of lot or 20 feet, whichever is less (measured from center of alley) to 10 feet for principal dwelling unit, 5 feet for accessory dwelling units, 0 feet if alley
Side Setback	Leave at 5 feet
Lot coverage	Increase from 35% of lot or 2,500 square feet, whichever is greater, to 50%
Accessory dwelling units (ADUs)	ADUs would count toward the density and floor area limits shown above and be subject to the same standards as principal dwelling units except for a maximum size limit of 1,000 square feet. No more than 2 ADUs would be allowed per lot.

- Increase the height limit from 30 feet to 32 feet to allow more livable floor-to-ceiling heights
- Implement a new amenity area requirement as follows:
    - 20% of lot area must be set aside as amenity area
    - Each amenity area must be at least 120 square feet in area and at least 8 feet in width and depth
    - At least 50% must be at ground level. The area of roof decks and balconies count as half the size of space as ground floor.
- Implement new design standards regulating access, entrances, windows/doors, and materials
- Update the tree planting requirements to encourage planting of larger species trees
- Allow reducing or waiving of parking requirements to protect tier 2 trees
- Allow additional floor area and density for stacked flats on lots 6,000 square feet or greater that are located within ¼ mile of frequent transit as follows:

	Stacked	Attached and Detached
FAR	1.4	1.2
Density	1 unit per 650 square feet	1 unit per 1,250 square feet

- Allow additional floor area, height, lot coverage, and density for affordable housing on lots that are located within ¼ mile of frequent transit as follows:

	Affordable Housing	Market-rate Attached and Detached
Height	4 stories	3 stories
FAR	1.8	1.2
Lot coverage	60%	50%
Density	1 unit per 400 square feet	1 unit per 1,250 square feet

Affordability Requirement	50% of units must be affordable at 60% of AMI for rental or 80% of AMI for ownership	None

- Exempt area of certain Environmentally Critical Areas and shorelines when calculating density and lot coverage in order to prevent significant increases in density in these areas, consistent with allowance in HB 1110 (for example, if you have a 10,000 square foot lot but half of it is in ECAs they you would only be able to develop half as many units – 4 units instead of 8 units)
- Allow corner stores throughout NR zones with following restrictions:
    - Must be located on corner lot
    - Limited to retail, restaurants, and food processing and craft work; food processing and craft work includes small-scale food preparation such as making jams or baking bread as well as sewing clothes or woodworking
    - Limited to ground floor and basements
    - Maximum size of 2,500 square feet
    - May not be open between 10pm and 7am
- Allow unit lot subdivision
- Allow two parking spaces in front setback as an alternative to autocourt on lots at least 40 feet in width to create more space for on-site open space
- Rezone all RSL zones to LR1 except for RSL zones in South Park that would be outside the updated boundaries of South Park Neighborhood Center which would be rezoned to NR

Changes to **Lowrise** zoning to meet state requirements and seek greater consistency with updated approach to NR zones

- Update density limits in LR1 zones to comply with HB 1110 requirement of at least 4 units on all lots and 6 units within ¼ mile of major transit stops
- Exempt area of certain Environmentally Critical Areas and shorelines when calculating density consistent with proposal for NR zones
- Increase height in LR1 zones from 30 feet to 32 feet similar to NR zones
- Shift from setbacks that vary by different building types into one set of setbacks that applies to all projects to comply with HB 1110 standards that development standards can't be more strict for attached and stacked housing than detached housing as summarized below:
    - Front setback: 7 feet average, 5 feet minimum
    - Rear setback: 7 feet average, 5 feet minimum, except 0 feet if alley

    - Side setback: 5 feet
- Shift from maximum structure widths that vary by different building types into maximum structure width of 90 feet for LR1 and LR2 zones and 150 feet for LR3
    - Comply with HB 1110 standards that development standards can't be more strict for attached and stacked housing than detached housing
- Remove facade length requirements to address barriers to stacked flats, new units on lots where homes are preserved, and development on lots with unusual site or topography issues
- Update design standards to comply with the HB 1293 that design standards must be clear and objective and to improve design outcomes
- Allow additional 0.2 FAR of floor area for stacked flats in LR1 and LR2 zones consistent with proposed bonus in NR zones
- Update amenity area to seek greater consistency with NR zones and to reduce instances where roof decks are required as follows:
    - Amenity area reduced from 25% to 20% consistent with NR zones
    - Amenity areas be at least 60 square feet in area and a minimum width and depth of 6 feet
- Allow stormwater features in setbacks to accommodate common rain barrel sizes
- Modify provisions for separations between buildings as follows:
    - Simplify the regulations about what is allowed within separations
    - Reduce the minimum separation from 10 feet to 6 feet to provide more flexibility in site layout and to discourage outcomes where most open space is located in separations between buildings

Additional changes affecting **multiple zones**

- Create a single set of standards for accessory dwelling units standards that apply across all zones to comply with HB 1337 and to increase consistency between zones as follows:
    - ADU would be allowed in all zones where residential uses are allowed
    - No more than two ADU are allowed per lot
    - The maximum size of an ADU would be 1,000 square feet
    - Other standards applied to ADU would be the same as those applied to principal units
- Update residential parking requirements to implement new policy direction as well as parking requirements in HB 1110 and HB 1337 as follows:
    - Remove residential parking requirements within ½ mile of major transit stops (residential uses in regional centers and station area overlays and

those in urban centers within ¼ mile of frequent transit are already exempt from parking)
    - Change parking requirements in other areas from 1 space per principal dwelling unit to 1 space per two principal dwelling units for all units (ADUs would continue not to have parking requirements)
- Update rezone criteria for NR and LR1 zones to reflect updated purpose of NR zoning and the difference between NR and LR1 zones
- Update definitions of residential use to reflect updated NR approach, simplify code, and address existing problems
- Clarify that adult family homes are allowed in all zones that allow residential uses as a home occupation as required by state law
- Clarify that shelters are allowed in all zones that allow residential use as required by state law
- Modify parking space size and tandem parking requirements to comply with SB 6015 as follows:
    - Reduce minimum width of largest required parking space from 8.5 feet to 8 feet
    - Allow tandem parking to count as two spaces
- Modify parking access requirements so they are based on number of units rather than type of unit to comply with HB 1110 requirement that development standards can't be more strict for attached and stacked housing than detached housing

TEXT

AN ORDINANCE relating to land use and zoning; amending Chapter 23.32 of the Seattle Municipal Code (SMC) at pages XX, XX, XX and XX of the Official Land Use Map; amending subsection 15.32.200.F, amending Sections 23.22.062, 23.24.045, 23.30.010, 23.34.011, 23.34.014, 23.42.110, 53.45.502, 23.45.504, 23.45.508, 23.45.510, 23.45.512, 23.45.514, 23.45.518, 23.45.522, 23.45.527, 23.45.529, 23.45.545, 23.45.550, 23.47A.004, 23.53.006, 23.53.025, 23.54.015, 23.54.020, 23.54.030, 23.84A.002, 23.84A.006, 23.84A.008, 23.84A.010, 23.84A.024, 23.84A.025, 23.84A.030, 23.84A.032, 23.84A.036, 23.84A.048, 23.86.002, 23.86.006, 23.86.008, 23.86.012, 23.86.017, 23.86.026, 23.90.019, 25.09.052, 25.09.240, 25.09.260, 25.09.520, and 25.11.090; repealing Sections 23.34.010, 23.34.012, 23.34.013, 23.40.035, Chapter 23.44, Sections 23.45.531, and 23.86.010; and adding Sections 23.42.022, 23.42.024, 23.42.132, new Chapter 23.44, and Sections 23.45.519, 23.54.031, 23.54.032, 23.54.033, 23.54.034 and 23.54.037 of the Seattle Municipal Code.

Rezone Language

Section 1. The Official Land Use Map, Chapter 23.32 of the Seattle Municipal Code, is amended to rezone properties on pages XX, XX, XX... of the Official Land Use Map as follows:

A. Properties identified for rezones in Map X through X as shown on Attachment 1 to this ordinance are rezoned as shown in those maps.

B. Except for properties identified to be rezoned in Maps X through X as shown on Attachment 1 to this ordinance, all areas designated with a zone shown in Table A for Section 1 are rezoned as shown in Table A for Section 1.

Table A for Section 1 **Standard Zoning Changes**	
Existing Zoning	**New Zoning**
RSL	LR1 (M)

Table A for Section 1 Standard Zoning Changes	
Existing Zoning	**New Zoning**
NR1	NR
NR2	NR
NR3	NR

2. Where the existing zoning includes a Major Institution Overlay, the underlying zoning shall be modified as stated in this subsection B and the Major Institution Overlay shall continue to apply.

3. The rezones in this subsection B shall not remove any existing suffixes other than height suffixes.

Section 2. Subsection 15.32.200.F of the Seattle Municipal Code, which section was last amended by Ordinance 126509, is amended as follows:

15.32.200 At-grade communication cabinets

Notes: The section is updated to reflect new zone names.

* * *

F. The applicant for a new at-grade communication cabinet proposal that is more than 36 inches in height including footings or bases as measured from the grade of the surrounding public place, or has a maximum volume of more than 18 cubic feet, shall: (1) send notice of a Seattle Department of Transportation application by first-class mail to all business entities, property owners, and residents located within a 100-foot radius from where the communication cabinet is proposed to be located; and (2) post notice of the new application at the proposed site. The notice shall be displayed towards the nearest public place that abuts the site and is viewable by the public and shall be maintained on the site for the duration of the public notice period.

1. If the new at-grade communication cabinet proposal is more than 36 inches in height including footings or bases as measured from the grade of the surrounding public place, or has a maximum volume of more than 18 cubic feet, and is

abutting a lot zoned ((~~NR1, NR2, NR3, RSL,~~)) NR, LR1, LR2, or LR3 as these zoning designations are defined under subsection 23.30.010.A and the abutting zoning does not have an RC classification as shown on the Official Land Use Map, Chapter 23.32 ("residentially zoned parcels"), the communication cabinet shall be fully screened from the public place and abutting private property. If it is not feasible to install mitigation screening due to physical site constraints, the applicant shall provide an alternative mitigation proposal within 200 feet of the project. If the alternative mitigation cannot be located within 200 feet of the project, the applicant shall propose an alternative location that the Director shall review and may approve. All mitigation screening shall comply with setback standards in Section 15.32.250 and remain the permittee's sole responsibility to maintain so long as the communication cabinet or accessory equipment occupies the public place. As determined by the Director, mitigation screening may include landscaping, fencing, or visual treatment to the cabinet surface. Visual treatment to the cabinet may include paint, decals, vinyl wraps, photos, or other surface treatments. A cabinet shall be considered fully screened for visual treatment purposes when the treatment is applied to all communication cabinet vertical surfaces.

2. The applicant shall send and post all required notices at least three calendar days before the start of the public notice period. The mailing and on-site notice shall be on a form provided by the Department of Transportation and shall include: a description of the proposed location and installations, comment period dates, information on how the public can submit comments to the Seattle Department of Transportation, and how to request a reconsideration of a Street Use permit decision. If the proposal is abutting a residentially zoned parcel, the mailing and on-site notice shall include a visual and narrative description of the proposed mitigation screening required in subsection 15.32.200.F.1.

3. Written comments concerning the application shall be postmarked or emailed to the Director of Transportation within ten business days after the first day of the public notice period.

4. The applicant shall provide the Director of Transportation with a mailing list containing the individuals the notice was mailed to, the recipient's mailing address, and date the notice was mailed to each recipient.

* * *

Section 3. Section 23.22.062 of the Seattle Municipal Code, last amended by Ordinance 126157, is amended as follows:

23.22.062 Unit lot subdivisions

Note: This section would be modified to use updated terminology and clarify that ADUs can't be located on a different lot than the principal dwelling unit.

A. The provisions of this Section 23.22.062 apply exclusively to the unit subdivision of land for residential development including ((~~single-family dwelling units, townhouse, rowhouse, and cottage housing developments,~~)) attached and detached dwelling units and existing ((~~apartment~~)) structures containing stacked dwelling units built prior to January 1, 2013, but not individual ((~~apartment~~)) stacked dwelling units, in all zones in which these uses are permitted, or any combination of the above types of residential development as permitted in the applicable zones.

B. ((~~Except for any site for which a permit has been issued pursuant to Sections 23.44.041 or 23.45.545 for a detached accessory dwelling unit, lots~~)) Lots developed or proposed to be developed with uses described in subsection 23.22.062.A may be subdivided into individual unit lots. The development as a whole shall meet development standards on the parent lot applicable at the time the permit application is vested. As a result of the subdivision, development on individual unit lots may be nonconforming as to some or all of the development standards based on analysis of the individual unit lot, except that any required private usable open space or private amenity area for each dwelling unit shall be provided on the same unit lot as the dwelling unit it serves.

C. Subsequent platting actions, additions or modifications to the structure(s) may not create or increase any nonconformity of the parent lot.

D. Access easements and joint use and maintenance agreements shall be executed for use of common garage or parking areas, common open space (such as common courtyard open spaces for cottage housing), and other similar features, as recorded with the King County Recorder. For common parking areas and garages, access easements and joint use and maintenance agreements shall include the right to use any required electric vehicle charging infrastructure and the terms of use.

E. Within the parent lot, required parking for a dwelling unit may be provided on a different unit lot than the lot with the dwelling unit, as long as the right to use that parking is formalized by an easement on the plat, as recorded with the King County Recorder.

F. The fact that the unit lot is not a separate buildable lot and that additional development of the individual unit lots may be limited as a result of the application of development standards to the parent lot shall be noted on the plat, as recorded with the King County Recorder.

G. Unit lot subdivision shall not result in an accessory dwelling unit that is located on a different unit lot than the principal unit with which the accessory dwelling unit is associated.

Section 4. Section 23.24.045 of the Seattle Municipal Code, last amended by Ordinance 126157, is amended as follows:

23.24.045 Unit lot subdivisions

Note: This section would be modified to use updated terminology and clarify that ADUs can't be located on a different lot than the principal dwelling unit.

A. The provisions of this Section 23.24.045 apply exclusively to the unit subdivision of land for residential development including ((~~single-family dwelling units, townhouse, rowhouse, and cottage housing developments,~~)) attached and detached dwelling units and existing ((~~apartment~~)) structures containing stacked dwelling units built prior to January 1, 2013, but not individual ((~~apartment~~)) stacked dwelling units, in all zones in which these uses are permitted, or any combination of the above types of residential development as permitted in the applicable zones.

B. ((~~Except for any lot for which a permit has been issued pursuant to Sections 23.44.041 or 23.45.545 for a detached accessory dwelling unit, lots~~)) Lots developed or proposed to be developed with uses described in subsection 23.24.045.A may be subdivided into individual unit lots. The development as a whole shall meet development standards on the parent lot applicable at the time the permit application is vested. As a result of the subdivision, development on individual unit lots may be nonconforming as to some or all of the development standards based on analysis of the individual unit lot, except that any required private, usable open space or private amenity area for each dwelling unit shall be provided on the same unit lot as the dwelling unit it serves.

C. Subsequent platting actions, additions, or modifications to the structure(s) may not create or increase any nonconformity of the parent lot.

D. Access easements and joint use and maintenance agreements shall be executed for use of common garage or parking areas, common open space (such as common courtyard open space for cottage housing), and other similar features, as recorded with the King County Recorder's Office. For common parking areas and garages, access easements and joint use and maintenance agreements shall include the right to use any required electric vehicle charging infrastructure and the terms of use.

E. Within the parent lot, required parking for a dwelling unit may be provided on a different unit lot than the lot with the dwelling unit, as long as the right to use that parking is formalized by an easement on the plat, as recorded with the King County Recorder's Office.

F. The facts that the unit lot is not a separate buildable lot, and that additional development of the individual unit lots may be limited as a result of the application of development standards to the parent lot, shall be noted on the plat, as recorded with the King County Recorder's Office.

G. Unit lot subdivision shall not result in an accessory dwelling unit that is located on a different unit lot than the principal unit with which the accessory dwelling unit is associated.

Section 5. Section 23.30.010 of the Seattle Municipal Code, last amended by Ordinance 126862, is amended as follows:

23.30.010 Classifications for the purpose of this Subtitle III

Note: This section would be modified to update zone names.

A. General zoning designations. The zoning classification of land shall include one of the designations in this subsection 23.30.010.A. Only in the case of land designated "RC," the classification shall include both "RC" and one additional multifamily zone designation in this subsection 23.30.010.A.

Zones	**Abbreviated**
Residential, Neighborhood ((~~1~~))	NR((~~1~~))
((~~Residential, Neighborhood 2~~	~~NR2~~
~~Residential, Neighborhood 3~~	~~NR3~~
~~Residential, Neighborhood, Small Lot~~	~~RSL~~))
Residential, Multifamily, Lowrise 1	LR1
Residential, Multifamily, Lowrise 2	LR2

Zones	Abbreviated
Residential, Multifamily, Lowrise 3	LR3
Residential, Multifamily, Midrise	MR
Residential, Multifamily, Highrise	HR
Residential-Commercial	RC
Neighborhood Commercial 1	NC1
Neighborhood Commercial 2	NC2
Neighborhood Commercial 3	NC3
Master Planned Community—Yesler Terrace	MPC-YT
Seattle Mixed—South Lake Union	SMU-SLU
Seattle Mixed—Dravus	SM-D
Seattle Mixed—North Rainier	SM-NR
Seattle Mixed - Rainier Beach	SM-RB
Seattle Mixed—University District	SM-U
Seattle Mixed—Uptown	SM-UP
Seattle Mixed—Northgate	SM-NG
Commercial 1	C1
Commercial 2	C2
Downtown Office Core 1	DOC1
Downtown Office Core 2	DOC2
Downtown Retail Core	DRC

Zones	Abbreviated
Downtown Mixed Commercial	DMC
Downtown Mixed Residential	DMR
Pioneer Square Mixed	PSM
International District Mixed	IDM
International District Residential	IDR
Downtown Harborfront 1	DH1
Downtown Harborfront 2	DH2
Pike Market Mixed	PMM
General Industrial 1	IG1
General Industrial 2	IG2
Industrial Buffer	IB
Industrial Commercial	IC
Maritime Manufacturing and Logistics	MML
Industry and Innovation	II
Urban Industrial	UI

B. Suffixes—Height limits, letters, and mandatory housing affordability provisions. The zoning classifications for land subject to some of the designations in subsection 23.30.010.A include one or more numerical suffixes indicating height limit(s) or a range of height limits, or one or more letter suffixes indicating certain overlay districts or designations, or numerical suffixes enclosed in parentheses indicating the application of incentive zoning provisions, or letter suffixes and letter-with-numerical suffixes enclosed in parentheses indicating the application of mandatory housing affordability provisions, or any combination of these. Mandatory housing affordability suffixes include (M), (M1),

and (M2). A letter suffix may be included only in accordance with provisions of this Title 23 expressly providing for the addition of the suffix. A zoning classification that includes a numerical or letter suffix or other combinations denotes a different zone than a zoning classification without any suffix or with additional, fewer, or different suffixes. Except where otherwise specifically stated in this Title 23 or where the context otherwise clearly requires, each reference in this Title 23 to any zoning designation in subsection 23.30.010.A without a suffix, or with fewer than the maximum possible number of suffixes, includes any zoning classifications created by the addition to that designation of one or more suffixes.

Section 6. Section 23.34.010 of the Seattle Municipal Code, last amended by Ordinance 126509, is repealed:

((~~23.34.010 - Designation of NR1, NR2, and NR3 zones~~

Note: This section would be removed as we are proposing to allow zones other than NR in a wider variety of areas.

~~A. Except as provided in subsection 23.34.010.B, areas zoned NR1, NR2, or NR3 may be rezoned to zones more intense than NR3 only if the City Council determines that the area does not meet the locational criteria for NR1, NR2, or NR3 zones.~~

~~B. Areas zoned NR1, NR2, or NR3 that meet the locational criteria contained in subsections 23.34.011.B.1 through 23.34.011.B.3 may only be rezoned to zones more intense than NR3 if they are located within the adopted boundaries of an urban village, and the rezone is to a zone that is subject to the provisions of Chapter 23.58B and Chapter 23.58C.~~))

Section 7. Section 23.34.011 of the Seattle Municipal Code, last amended by Ordinance 126509, is amended as follows:

23.34.011 ((~~NR1, NR2, and NR3~~)) NR zone((~~s~~)), function, and locational criteria

Note: This section is being updated to recognize the new standards in NR zones and to remove criteria that prevent rezoning NR zones except in extremely limited cases.

A. Function. An area that provides ((~~predominantly detached single-family structures on lot sizes compatible with the existing pattern of development and the character of neighborhood residential areas~~)) for the development of detached, attached, and stacked dwelling units within a predominately three-story height limit.

B. Locational criteria. An ((~~NR1, NR2, or NR3~~)) NR zone designation is most appropriate in areas that are outside of urban centers and villages and ((~~meet the following criteria~~)) are generally characterized by the following conditions:

1. ((~~Areas that consist of blocks with at least 70 percent of the existing structures, not including detached accessory dwelling units, in single-family residential use; or~~)) The area is characterized by dwelling units of generally three stories or less;

2. ((~~Areas that are designated by an adopted neighborhood plan as appropriate for single-family residential use; or~~)) The area is currently zoned Neighborhood Residential or has significant environmentally critical area; and

3. ((~~Areas that consist of blocks with less than 70 percent of the existing structures, not including detached accessory dwelling units, in single-family residential use but in which an increasing trend toward single-family residential use can be demonstrated; for example~~)) The area is not located near major transit stops or on frequent transit routes where higher density development might be more appropriate.

((~~a. The construction of single-family structures, not including detached accessory dwelling units, in the last five years has been increasing proportionately to the total number of constructions for new uses in the area, or~~

~~b. The area shows an increasing number of improvements and rehabilitation efforts to single-family structures, not including detached accessory dwelling units, or~~

~~c. The number of existing single-family structures, not including detached accessory dwelling units, has been very stable or increasing in the last five years, or~~

~~d. The area's location is topographically and environmentally suitable for single-family residential developments.~~

~~C. An area that meets at least one of the locational criteria in subsection 23.34.011.B should also satisfy the following size criteria in order to be designated as a NR1, NR2, or NR3 zone:~~

~~1. The area proposed for rezone should comprise 15 contiguous acres or more, or should abut existing NR1, NR2, or NR3 zones.~~

2. If the area proposed for rezone contains less than 15 contiguous acres, and does not abut existing NR1, NR2, or NR3 zones, then it should demonstrate strong or stable single-family residential use trends or potentials such as:

a. That the construction of single-family structures, not including detached accessory dwelling units, in the last five years has been increasing proportionately to the total number of constructions for new uses in the area, or

b. That the number of existing single-family structures, not including detached accessory dwelling units, has been very stable or increasing in the last five years, or

c. That the area's location is topographically and environmentally suitable for single-family structures, or

d. That the area shows an increasing number of improvements or rehabilitation efforts to single-family structures, not including detached accessory dwelling units.

D. Half-blocks at the edges of NR1, NR2, or NR3 zones which have more than 50 percent single-family structures, not including detached accessory dwelling units, or portions of blocks on an arterial which have a majority of single-family structures, not including detached accessory dwelling units, shall generally be included. This shall be decided on a case-by-case basis, but the policy is to favor including them.))

Section 8. Section 23.34.012 of the Seattle Municipal Code, last amended by Ordinance 126855, is repealed:

((23.34.012 Neighborhood Residential Small Lot (RSL) zone, function, and locational criteria

Note: We are proposing to get rid of RSL zones as part of the update of Neighborhood Residential zones.

A. Function. An area within an urban village that provides for the development of homes on small lots that may be more affordable compared to detached homes on larger lots and appropriate for households with children.

B. Locational criteria. An RSL zone is most appropriate in areas generally characterized by the following:

1. The area is similar in character to neighborhood residential zones;

~~2. The area is located inside an urban center, urban village, or Station Area Overlay District where it would provide opportunities for a diversity of housing types within these denser environments;~~

~~3. The area is characterized by, or appropriate for, a mix of single-family dwelling units, multifamily structures that are similar in scale to single-family dwelling units, such as duplex, triplex, rowhouse, and townhouse developments, and single-family dwelling units that have been converted to multifamily residential use or are well-suited to conversion;~~

~~4. The area is characterized by local access and circulation that can accommodate low density development oriented to the ground level and the street, and/or by narrow roadways, lack of alleys, and/or irregular street patterns that make local access and circulation less suitable for higher density multifamily development;~~

~~5. The area is within a reasonable distance of frequency transit service, but is not close enough to make higher density multifamily development more appropriate.~~

~~6. The area would provide a gradual transition between neighborhood residential zoned areas and multifamily or neighborhood commercial zoned areas; and~~

~~7.The area is supported by existing or projected facilities and services used by residents, including retail sales and services, parks, and community centers.~~))

Section 9. Section 23.34.013 of the Seattle Municipal Code, last amended by Ordinance 126509, is repealed:

((~~23.34.013 Designation of multifamily zones~~

~~An area zoned neighborhood residential that meets the criteria of Section 23.34.011 for designation as NR1, NR2 or NR3 may not be rezoned to multifamily except as otherwise provided in Section 23.34.010.B.~~))

Section 10. Section 23.34.014 of the Seattle Municipal Code, last amended by Ordinance 126509, is amended as follows:

23.34.014 Lowrise 1 (LR1) zone, function and locational criteria

Note: This section is being updated to recognize the new standards in NR and LR zones.

A. Function. The function of the LR1 zone is to provide opportunities ((~~for low-density multifamily housing, primarily rowhouse and townhouse developments, through infill development that is compatible with single-family dwelling units, or through the conversion of existing single-family dwelling units to duplexes or triplexes~~)) for the development of detached, attached, and stacked dwelling units within a predominately three-story height limit at a higher intensity than Neighborhood Residential zones.

B. Locational Criteria. The LR1 zone is most appropriate in areas generally characterized by the following conditions:

1. The area is similar in character to ((~~neighborhood residential~~)) Neighborhood Residential zones;

2. The area is either:

a. located outside of an urban center, urban village, or Station Area Overlay District;

b. a limited area within an urban center, urban village, or Station Area Overlay District that would provide opportunities for a diversity of housing types within these denser environments; or

c. located on a collector or minor arterial;

3. The area is characterized by ((~~a mix of single-family dwelling units, multifamily structures that are similar in scale to single-family dwelling units, such as rowhouse and townhouse developments, and single-family dwelling units that have been converted to multifamily residential use or are well-suited to conversion~~)) dwelling units of generally three stories or less;

4. The area is characterized by local access and circulation that can accommodate low density multifamily development oriented to the ground level and the street, and/or by narrow roadways, lack of alleys, and/or irregular street patterns that make local access and circulation less suitable for higher density multifamily development;

5. The area would provide a gradual transition between ((~~neighborhood residential~~)) Neighborhood Residential zoned areas and multifamily or neighborhood commercial zoned areas; and

6. The area is supported by existing or projected facilities and services used by residents, including retail sales and services, parks, and community centers.

Section 11. Section 23.40.035 of the Seattle Municipal Code, enacted by Ordinance 123939, is repealed:

((~~23.40.035 Location of accessory dwelling units on through lots~~

Note: This section is being repealed as the treatment of through lots is being clarified in the definition of "lot line, front" for all dwelling units, not just for accessory dwelling units.

~~On a through lot, when yards cannot be determined pursuant to Section 23.40.030, the Director shall designate a rear yard for the purpose of allowing a detached accessory dwelling. In designating a rear yard, the Director shall consider factors including but not limited to the location of existing structures, vehicular and pedestrian access, platting patterns in the vicinity and topography.~~))

Section 12. A new Section 23.42.022 is added to the Seattle Municipal Code as follows:

23.42.022 Accessory dwelling units

Note: This section is being added to clarify the standards that apply to ADUs in all zones. These standards are new for Neighborhood Residential zones, which regulate ADUs very different than other zones, but are consistent with existing standards in other zones.

A. Accessory dwelling units are allowed as a housing use in all zones where housing uses are allowed.

B. Accessory dwelling units may not be accessory to residential uses other than housing uses.

C. No lot may have more than two accessory dwelling units.

D. Unless otherwise provided in the standards of the underlying zone, accessory dwelling units shall be subject to the same standards as principal dwelling units.

E. Accessory dwelling units must be located on same lot as the principal dwelling unit.

F. The gross floor area of an attached accessory dwelling unit may not exceed 1,000 square feet, including garage area, unless the portion of the structure in which the attached accessory dwelling unit is located existed as of December 31, 2017.

Section 13. A new Section 23.42.024 is added to the Seattle Municipal Code as follows:

23.42.024 Adult family homes

Note: This section is being added to clarify how adult family homes are currently being regulated.

Adult family homes are allowed as a home occupation in all zones where housing uses are allowed.

Section 14. Section 23.42.110 of the Seattle Municipal Code, last amended by Ordinance 126509, is amended as follows:

23.42.110 Change from one nonconforming use to another nonconforming use

A nonconforming use may be converted by an administrative conditional use authorization to another use not otherwise permitted in the zone subject to the following limitations and conditions.

A. In ((~~neighborhood residential and residential small lot~~)) Neighborhood Residential zones, a nonconforming multifamily residential use may not be converted to any nonresidential use not otherwise permitted in the zone.

* * *

Section 15. A new Section 23.42.132 is added to the Seattle Municipal Code as follows:

23.42.132 Columbariums, garden wall crypts, and mausoleums

NOTE: This section is being moved from the Neighborhood Residential zones chapter to clarify that they apply in all zones.

Columbariums, garden wall crypts, and mausoleums are permitted only as accessory to existing cemeteries, except that columbariums and garden wall crypts may also be accessory to religious facilities. In addition, no interment openings shall abut or be directly across the street from property other than cemetery property. For columbariums, garden wall crypts, and mausoleums accessory to existing cemeteries, any border between structures and the property line shall be landscaped and maintained by the owner in good condition.

Changes to Chapter 23.44

Section 16. Chapter 23.44 of the Seattle Municipal Code, last amended by Ordinance XXXXXX is repealed as shown in Attachment 2.

Section 17. A new Chapter 23.44, Neighborhood Residential, is added to Title 23 of the Seattle Municipal Code, as follows:

23.44.002 Scope of provisions

A. This Chapter 23.44 establishes regulations for the Neighborhood Residential (NR) zone.

B. Some land in these zones may be regulated by Subtitle III, Division 3, Overlay Districts, of this Title 23 in addition to the standards of this Chapter 23.44.

C. Definitions are provided in Chapter 23.84A. Methods for measurements are provided in Chapter 23.86.

D. Other regulations may apply to development proposals, including but not limited to general use provisions (Chapter 23.42); transportation concurrency and transportation impact mitigation (Chapter 23.52); requirements for streets, alleys, and easements (Chapter 23.53); standards for parking quantity, access, and design (Chapter 23.54); standards for solid waste storage (Chapter 23.54); sign regulations (Chapter 23.55); communication regulations (Chapter 23.57); shoreline regulations (23.60A); and environmental protection and historic preservation (Title 25).

E. Assisted living facilities, congregate residences, and structures containing ground floor commercial uses shall meet the development standards for stacked units unless otherwise specified. Congregate residences are subject to additional requirements as specified in Section 23.42.049.

23.44.004 Permitted and prohibited uses

Note: The use standards in this section have been updated to consolidate provisions for principal and accessory uses, to create a use table similar to those used for other zones, to reflect the updated definitions for residential use, and to add a provision allowing corner stores.

A. All uses are permitted outright, prohibited, or permitted as a conditional use according to Table A for 23.44.004 and this Section 23.44.004. Uses not referred to in Table A for 23.44.004 are prohibited, unless otherwise indicated in this Chapter 23.44 or Chapters 23.51A, 23.51B, or 23.57. Communication utilities and accessory communication devices, except as exempted in Section 23.57.002, are subject to the regulations in this Chapter 23.44 and additional regulations in Chapter 23.57. Public facilities are subject to the regulations in Section 23.51A.004.

B. All permitted uses are allowed as a principal use or as an accessory use, unless otherwise indicated in this Chapter 23.44.

Table A for 23.44.004 **Permitted and prohibited uses**	
Uses	**Permitted and prohibited uses**
A. Residential use except as listed below	P
A.1. Assisted living facilities	X
A.2. Caretaker's quarters	X
A.3. Congregate residences	X/P[1]
B. Institutions except as listed below	CU
B.1. Child care centers	P
B.2. Community centers that do not provide shelter services	P
B.3. Community farms	P
B.4. Libraries	P
B.5. Public schools	P
C. Uses in existing or former public schools	

Table A for 23.44.004 **Permitted and prohibited uses**	
Uses	**Permitted and prohibited uses**
C.1. Preschools, public or private schools, colleges, and family support centers in existing or former public schools	P
C.2. Uses not otherwise permitted in existing or former public schools	P[2]
D. Parks and open space	P
E. Ground-floor commercial uses	P[3]
F. Human service use	P
G. Cemeteries	P/X[4]
H. Community gardens	P
I. Rail transit facilities and railroads;	P
J. Park and ride facilities	CU[5]
K. Commercially operating horse farms in existence before July 1, 2000	P[6]
L. Uses not otherwise permitted if located in Landmark structures	CU[7]
M. Uses not otherwise permitted if located in structures unsuited to permitted uses	CU[8]
N. All other uses	X
Key to Table A for 23.44.004 P = Permitted outright CU = Permitted as an Administrative Conditional Use X = Prohibited	

Table A for 23.44.004 **Permitted and prohibited uses**	
Uses	**Permitted and prohibited uses**
Footnotes to Table A for 23.44.004 [1] Congregate housing is allowed within a quarter mile of a major transit stop and prohibited in other areas. [2] Pursuant to procedures established in Chapter 23.78 [3] Ground-floor commercial uses are only allowed if they meet the standards of subsection 23.44.006.E [4] Subject to subsection 23.44.004.D [5] Pursuant to standards in subsection 23.44.006.F [6] Provided that they are located on lots greater than ten acres and conform to the limits on the number and location of farm animals and structures containing them set forth in Section 23.42.052 [7] Pursuant to standards in subsection 23.44.006.D [8] Pursuant to standards in subsection 23.44.006.E	

C. Accessory uses

1. Except as otherwise provided in this subsection 23.44.004.C, accessory uses customarily incidental to principal uses permitted outright are permitted outright.

2. All accessory uses and structures, except for urban farms and structures in urban farm use, must be located on the same lot as the principal use or structure unless otherwise specifically provided.

3. Urban farms with planting area not more than 4,000 square feet are permitted outright as an accessory use. Urban farms with more than 4,000 square feet of planting area may permitted as an administrative conditional use accessory to any principal use permitted outright or as a conditional use, pursuant to Section 23.42.051.

4. Piers and floats are permitted provided they comply with Chapter 23.60A.

5. Bed and breakfast are permitted outright provided they meet the following conditions:

a. The bed and breakfast use has a valid business license tax certificate issued by the Department of Finance and Administrative Services;

b. All operators of bed and breakfast uses who use a short-term rental platform for listing the bed and breakfast shall have a valid short-term rental operator's license issued by the Department of Finance and Administrative Services.

c. The bed and breakfast use shall be operated by the primary resident of the dwelling unit where the bed and breakfast is located or the resident operator;

d. There shall be no evidence of the bed and breakfast use visible from the exterior of the dwelling unit except for a sign permitted by subsection 23.55.020.D.1;

e. The bed and breakfast use shall have no more than five guest rooms, provided that this limitation does not apply to bed and breakfast uses that were established on or before April 1, 1987.

6. Accessory dwelling units are allowed consistent with Section 23.42.025.

D. Existing cemeteries are permitted to continue in use. New cemeteries are prohibited and existing cemeteries are prohibited from expanding. For purposes of this Section 23.44.004, a change in a cemetery boundary is not considered an expansion in size and is permitted provided that:

1. The change does not increase the net land area occupied by the cemetery;

2. The land being added to the cemetery is contiguous to the existing cemetery and is not separated from the existing cemetery by a public street or alley whether or not improved; and

3. The use of the land being added to the cemetery will not result in the loss of housing.

E. All ground-floor commercial uses permitted pursuant to this Section 23.44.004 shall meet the following conditions:

1. The commercial use is located on a corner lot.

2. The commercial use is limited to the following:

a. Food processing and craft work;

b. General sales and services; and

c. Restaurants.

3. The gross floor area of commercial uses do not occupy more than 2,500 square feet.

4. The commercial use is permitted only on or below the ground floor of a structure. On sloping lots, the commercial use may be located at more than one level within the structure as long as the floor area in commercial use does not exceed the area of the structure's footprint.

5. Vents for venting of odors, vapors, smoke, gas and fumes, and exterior heat exchangers and other similar devices (e.g., related to ventilation, air conditioning, refrigeration) shall be at least 10 feet above finished sidewalk grade and directed away to the extent possible from residential uses within 50 feet of the vent.

6. Drive-in businesses are prohibited as a principal or accessory use.

7. Outdoor sales and/or service of food or beverages must be located at least 50 feet from adjacent lots.

8. Businesses may not be open between the hours of 10 p.m. and 7 a.m.

23.44.006 Administrative conditional uses

Note: Requirements for conditional uses that were previously in many different sections have been consolidated into this section.

A. Uses permitted as administrative conditional uses in Section 23.44.004 may be permitted by the Director when the provisions of Section 23.42.042 and this Section 23.44.006 are met.

B. Unless otherwise specified in this Chapter 23.44, conditional uses shall meet the development standards for uses permitted outright. If an existing structure is nonconforming to development standards, no conditional use is required for any alterations that do not increase the nonconformity.

C. Institutions permitted as a conditional use shall meet the development standards in Section 23.44.007.

D. A use not otherwise permitted in a Neighborhood Residential zone within a structure designated as a Seattle landmark that is subject to controls and incentives imposed by a designating ordinance, when the owner of the landmark has executed and

recorded an agreement acceptable in form and content to the Landmarks Preservation Board providing for the restoration and maintenance of the historically significant features of the structure, may be permitted subject to the following:

1. The use is compatible with the existing design and/or construction of the structure without significant alteration;

2. Uses permitted by the zone are impractical because of structure design and/or that no permitted use can provide adequate financial support necessary to sustain the structure in reasonably good physical condition; and

3. The use shall not be detrimental to other properties in the zone or vicinity or to the public interest.

E. Uses in structures unsuited to uses permitted outright

1. A use not otherwise permitted in a Neighborhood Residential zone may be permitted as an administrative conditional use in structures unsuited to uses permitted outright in Neighborhood Residential zones. The determination that a use may be permitted shall be based on the following factors:

a. The design of the structure is not suitable for conversion to a use permitted outright in a Neighborhood Residential zone; and

b. The structure contains more than 4,000 square feet; and

c. The proposed use will provide a public benefit.

2. Parking requirements for uses permitted under this subsection 23.44.006.E shall be determined by the Director.

3. The Director may require measures to mitigate impacts such as noise, odor, parking or traffic impacts. Mitigating measures may include but are not limited to landscaping, sound barriers, fences, mounding or berming, adjustments to development standards, design modifications or setting hours of operation.

4. In the case of an existing or former public school, permissible uses other than those permitted outright in the zone and their development standards including parking requirements shall be established only pursuant to procedures for establishing criteria for joint use or reuse of public schools in Chapter 23.78.

F. A park and ride facility under the management of a public agency responsible for commuter pooling efforts may be permitted if the Director determines that:

1. It is to be located on an existing parking lot;

2. That parking proposed for the park and ride facility is not needed by the principal use or its accessory uses during the hours proposed for park and ride use; and

3. The park and ride use shall not interfere or conflict with the peak-hour activities associated with the principal use and its accessory uses. The Director may control the number and location of parking spaces to be used.

G. Any use that was previously authorized by a conditional use permit but which has been discontinued shall not be re-established or re-commenced except pursuant to a new conditional use permit, provided that such permit is required for the use at the time re-establishment or re-commencement is proposed. Vacant property, except for dead storage of materials or equipment of the conditional use, shall not be considered as being devoted to the authorized conditional use. The expiration of licenses necessary for the conditional use shall be evidence that the property is not being devoted to the conditional use. A conditional use in a multifamily structure or a multitenant commercial structure shall not be considered as discontinued unless all units are either vacant or devoted to another use. The following shall constitute conclusive evidence that the conditional use has been discontinued:

1. A permit to change the use of the property has been issued and the new use has been established; or

2. The property has not been devoted to the authorized conditional use for more than 24 consecutive months.

H. Minor structural work that does not increase usable floor area or seating capacity and that does not exceed the development standards applicable to the use shall not be considered an expansion and does not require approval as a conditional use unless the work would exceed the height limit of the zone for uses permitted outright. Such work includes but is not limited to roof repair or replacement and construction of uncovered decks and porches, facilities for barrier-free access, bay windows, dormers, and eaves.

23.44.007 Institutions permitted as a conditional use

Note: This section would be moved from 23.44.022, but the content remains the same.

A. Scope of standards. The standards of this Section 23.44.007 apply only to institutions permitted as conditional uses in Neighborhood Residential zones.

B. General provisions

1. New or expanding institutions in Neighborhood Residential zones shall meet the development standards for uses permitted outright unless modified elsewhere in this Section 23.44.007 or in a Major Institution master plan.

2. Institutions seeking to establish or expand on property that is developed with residential structures may expand their campus up to a maximum of 2.5 acres. An institution campus may be established or expanded beyond 2.5 acres if the property proposed for the expansion is vacant land.

C. Dispersion. The lot line of any proposed new or expanding institution shall be located at least 600 feet from any lot line of any other institution in a residential zone, with the following exceptions:

1. An institution may expand even though it is within 600 feet of a public school if the public school is constructed on a new site subsequent to December 12, 1985.

2. A proposed institution may be located less than 600 feet from a lot line of another institution if the Director determines that the intent of the dispersion criteria is achieved due to the presence of physical elements that provide substantial separation from other institutions, such as bodies of water, large open spaces or topographical breaks, or other elements such as arterials, freeways, or nonresidential uses.

D. Demolition of residential structures. No residential structure shall be demolished nor shall its use be changed to provide for parking. This prohibition may be waived if the demolition or change of use proposed is necessary to meet the parking requirements of Title 23 and if alternative locations would have greater noise, odor, light and glare, or traffic impacts on surrounding property in residential use. If the demolition or change of use is proposed for required parking, the Director may consider waiver of parking requirements in order to preserve the residential structure and/or use. The waiver may include, but is not limited to, a reduction in the number of required parking spaces and a waiver of parking development standards such as location or screening.

E. Reuse of existing structures. Existing structures may be converted to institution use if the setback requirements for institutions are met. Existing structures that do not meet these setback requirements may be permitted to convert to institution use, provided that the Director may require additional mitigating measures to reduce impacts of the proposed use on surrounding properties.

F. Noise and odors. For the purpose of reducing potential noise and odor impacts, the Director shall consider the location on the lot of the proposed institution, on-site

parking, outdoor recreational areas, trash and refuse storage areas, ventilating mechanisms, sports facilities and other noise-generating and odor-generating equipment, fixtures or facilities. The institution shall be designed and operated in compliance with Chapter 25.08. In order to mitigate identified noise and/or odor impacts, the Director may require measures such as landscaping, sound barriers or fences, mounding or berming, adjustments to setback or parking development standards, design modifications, or setting hours of operation for facilities.

G. Landscaping

1. The Director shall promulgate rules to foster the long-term health, viability, and coverage of plantings. The rules shall address, at a minimum, the type and size of plants, spacing of plants, use of drought-tolerant plants, and access to light and air for plants. All landscaping provided to meet the requirements of this Section 23.44.007 shall comply with these rules.

2. Landscaping that achieves a Green Factor score of 0.3 or greater, pursuant to Section 23.86.019, is required for any lot with:

a. Development containing more than four new dwelling units;

b. Development, either a new structure or an addition to an existing structure, containing more than 4,000 new square feet of non-residential uses; or

c. Any parking lot containing more than 20 new parking spaces for automobiles.

H. Bulk and siting

1. Lot area. If the proposed site is larger than one acre, the Director may require the following and similar development standards:

a. For lots with unusual configuration or uneven boundaries, the proposed principal structures be located so that changes in potential and existing development patterns on the block or blocks within which the institution is located are kept to a minimum;

b. For lots with large street frontage in relationship to their size, the proposed institution reflect design and architectural features associated with adjacent residentially zoned block fronts in order to provide continuity of the block front and to integrate the proposed structures with residential structures and uses in the immediate area.

2. Setbacks

a. Setbacks of institutions shall be as required for uses permitted outright pursuant to Section 23.44.004, except that the side setback for side lot lines that do not abut an alley shall be 10 feet. All the provisions in Section 23.44.018 relating to projections and structures in setbacks shall still apply. If the Director finds that a reduced setback will not significantly increase project impacts, including but not limited to noise, odor, and the scale of the structure in relation to nearby buildings, the side setback may be reduced to 5 feet.

b. Fences and freestanding walls of utility services uses, regulated under this Section 23.44.007 pursuant to Section 23.51A.002, shall be set back from the street lot line a minimum of 10 feet, and landscaping shall be provided between the fence or wall and the right-of-way. The Director may reduce this setback after finding that the reduced setback will not significantly increase project impacts, including but not limited to noise, odor, and the scale of the fence, wall, or structure in relation to nearby buildings. Acceptable methods to reduce fence or wall impacts include changes in the height, design or construction of the fence or wall, including the use of materials, architectural detailing, artwork, vegetated trellises, decorative fencing, or similar features to provide visual interest facing the street lot line. Fences and walls may obstruct or allow views to the interior of a site. Where site dimensions and conditions allow, applicants are encouraged to provide both: a landscaped setback between the fence or wall and the right-of-way; and a fence or wall that provides visual interest facing the street lot line through the height, design, or construction of the fence or wall, including the use of materials, architectural detailing, artwork, vegetated trellises, decorative fencing, or similar features.

3. Institutions located on lots which include more than one zone classification. For lots that include more than one zone classification, neighborhood residential zone provisions shall apply only to the Neighborhood Residential zoned lot area involved.

4. Height limit. Institutions are subject to the height limits in Section 23.44.014 except as follows:

a. Religious symbols for religious institutions may extend an additional 25 feet above the height limit.

b. For gymnasiums and auditoriums that are accessory to an institution the maximum height shall be 35 feet if portions of the structure above 35 feet are set back at least 20 feet from all property lines. Pitched roofs on a gymnasium or auditorium that have a slope of not less than 4:12 may extend 10 feet above the 35-foot

height limit. No portion of a shed roof on a gymnasium or an auditorium shall be permitted to extend beyond the 35-foot height limit under this provision.

I. Parking and loading berth requirements. The Director may modify the parking and loading requirements of Section 23.54.015 and the requirements of Section 23.44.036 on a case-by-case basis using the information contained in the transportation plan prepared pursuant to subsection 23.44.022.M. The modification shall be based on adopted City policies and shall:

1. Provide a demonstrable public benefit such as reduction of traffic on residential streets, preservation of residential structures, and reduction of noise, odor, light and glare; and

2. Not cause undue traffic through residential streets or create a safety hazard.

J. Transportation plan. A transportation plan shall be required for proposed new institutions and for those institutions proposing expansions that are larger than 4,000 square feet of structure area and are required to provide an additional two or more parking spaces. The Director shall determine the level of detail to be disclosed in the transportation plan based on the probable impacts and/or scale of the proposed institution. Discussion of the following elements and other factors may be required:

1. Traffic. Number of staff on site during normal working hours, number of users, guests and others regularly associated with the site, level of vehicular traffic generated, traffic peaking characteristics of the institution and in the immediate area, likely vehicle use patterns, extent of traffic congestion, types and numbers of vehicles associated with the institution and mitigating measures to be taken by the applicant;

2. Parking. Number of spaces, the extent of screening from the street or abutting residentially zoned lots, direction of vehicle light glare, direction of lighting, sources of possible vibration, prevailing direction of exhaust fumes, location of parking access and curb cuts, accessibility or convenience of parking and measures to be taken by the applicant such as preference given some parking spaces for carpool and vanpool vehicles and provision of bicycle racks;

3. Parking overflow. Number of vehicles expected to park on neighboring streets, percentage of on-street parking supply to be removed or used by the proposed project, opportunities for sharing existing parking, trends in local area development and mitigating measures to be taken by the applicant;

4. Safety. Measures to be taken by the applicant to ensure safe vehicular and pedestrian travel in the vicinity;

5. Availability of public or private mass transportation systems. Route location and frequency of service and private mass transportation programs to be provided by the applicant such as carpools and vanpools.

K. Development standards for existing institutes for advanced study

1. The institute shall be located on a lot of not less than 15 acres.

2. The lot coverage for all structures shall not exceed 20 percent of the total lot area.

3. Structures shall be set back a minimum of 25 feet from any lot line.

4. Parking areas shall be set back a minimum of 10 feet from any lot line.

5. In the event of expansion, parking shall be required as provided for existing institutes for advanced study in Section 23.54.015.

6. Landscaping shall be provided between a lot line and any structure and shall be maintained for the duration of the use.

L. The establishment of a shelter for homeless youths and young adults in a legally established elementary or secondary school, is not considered a new use or an expansion of the institutional use provided that:

1. The use does not violate any condition of approval of the existing institutional use;

2. The use does not require expansion of the existing structure;

3. Any new children's play area is located at least 30 feet from any other lot in a Neighborhood Residential zone, and at least 20 feet from any lot in a multifamily zone;

4. The occupants are enrolled students of the established school.

23.44.008 General provisions

Note: General provisions that were previously in multiple sections have been consolidated into this section.

A. An exception from one specific standard does not relieve the applicant from compliance with any other standard.

B. Any structure occupied by a permitted principal use other than residential use may be converted to residential use even if the structure does not conform to the development standards for residential uses in Neighborhood Residential zones.

C. If more than one category of residential use is located on a lot, and if different development standards apply to the different categories of use, then each category's percentage of the total limit imposed by the development standard shall be calculated based on each category's percentage of total structure footprint area, as follows:

1. Calculate the footprint, in square feet, for each category of residential use. For purposes of this calculation, "footprint" is defined as the horizontal area enclosed by the exterior walls of the structure.

2. Calculate the total square feet of footprint of all categories of residential uses on the lot.

3. Divide the square footage of the footprint for each category of residential structure in subsection 23.44.008.C.1 by the total square feet of footprints of all residential uses in subsection 23.44.008.C.2.

4. Multiply the percentage calculated in subsection 23.44.008.C.3 for each housing category by the area of the lot. The result is the area of the lot devoted to each housing category.

5. The total limit for each category of residential use is the applicable limit for that use multiplied by the percentage calculated in subsection 23.44.008.C.4.

23.44.010 Floor area

Note: The floor area ratio would be modified, but the measurement process and the exemptions would stay the same.

A. Gross floor area. In Neighborhood Residential zones, gross floor area includes exterior corridors, breezeways, and stairways that provide building circulation and access to dwelling units or sleeping rooms. Balconies, patios, and decks that are associated with a single dwelling unit or sleeping room and that are not used for common circulation are not considered gross floor area.

B. Floor area ratio (FAR) limits. The FAR limit in Neighborhood Residential zones is as shown in Table A for 23.44.010. The applicable FAR limit applies to the total chargeable floor area of all structures on the lot.

Table A for 23.44.010 **Floor area ratio (FAR) in NR zones**	
Density	**Floor area ratio**
Less than 1 unit / 4,000 square feet	0.6
1 unit / 4,000 sq ft to 1 unit / 2,201 sq ft	0.8
1 unit / 2,200 sq ft to 1 unit / 1,601 sq ft	1.0
1 unit / 1,600 sq ft or greater	1.4 for stacked dwelling units that do not include congregate housing; 1.2 for other dwelling units

C. The following floor area is exempt from FAR limits:

1. All stories, or portions of stories, that are underground.

2. All portions of a story that extend no more than 4 feet above existing or finished grade, whichever is lower, excluding access.

23.44.012 Minimum lot size and maximum density

Note: The minimum lot size is proposed to be substantially reduced and a new density limit requirements would be added to allow a wider variety of housing types and to comply with the requirements of state legislation codified by HB 1110. The area of certain Environmentally Critical Areas is proposed to be excluded from lots size for the purpose of calculating density.

A. Except as provided in subsection 23.44.012.D, the minimum lot size is 1,250 square feet.

B. Except as provided in subsection 23.44.012.C and 23.44.012.D, the maximum density is:

1. For stacked dwelling units on lots larger than 6,000 square feet that are located with a quarter mile of a major transit stop or a transit stop or station served by a frequent transit route on the map required by subsection 23.54.015.B.4, one dwelling unit per 650 square feet;

2. For all other dwelling units, one dwelling unit per 1,250 square feet of lot area.

C. Maximum density exceptions

1. At least one dwelling unit is allowed on all lots in existence as of June 6, 2024.

2. A lot that does not meet the minimum size necessary for four dwelling units under subsection 23.44.012.B may be developed with up to four dwelling units if the lot meets the following criteria:

a. The lot was in existence as a legal building site prior to June 6, 2024;

b. The lot has not been divided through a subdivision or short subdivision or modified by unit lot subdivision on June 6, 2024 or later; and

c. The lot does not contain any riparian corridors; wetlands and their buffers; submerged lands and areas within the shoreline setback; or steep slopes.

3. Notwithstanding subsection 23.44.012.C.2, a lot that does not meet the minimum size necessary for six units under subsection 23.44.012.B may be developed with up to six units if the lot meets the following criteria:

a. The lot is located within one-quarter mile walking distance of a major transit stop;

b. The lot was in existence as a legal building site prior to June 6, 2024;

c. The lot has not been divided through a subdivision or short subdivision or modified by unit lot subdivision since June 6, 2024; and

d. The lot does not contain any riparian corridors; wetlands and their buffers; submerged lands and areas within the shoreline setback; or steep slopes.

D. Measurement of maximum density

1. When calculation of the number of dwelling units allowed results in a fraction of a unit, any fraction shall be rounded down.

2. Congregate residence sleeping rooms shall be treated as one-fourth of a dwelling unit for purposes of calculating density.

3. In the case of unit lot subdivision, the density limit shall be applied to the parent lot as a whole.

4. If dedication of right-of-way is required, permitted density shall be calculated before the dedication is made.

5. Areas not counted in calculating the lot size. The following areas shall not be counted in calculating the area of lots for the purpose of calculating minimum lot size in subsection 23.44.012.A and maximum density in this subsection 23.44.012.B:

a. Riparian corridors;

b. Wetlands and their buffers;

c. Submerged lands and areas within the shoreline setback; and

d. Designated non-disturbance area in steep slopes.

23.44.014 Structure height

Note: Maximum structure height is proposed to be increased from 30 feet to 32 feet to allow comfortable floor to ceiling heights for projects in which the first floor is not at grade. Shed and butterfly rooves would be allowed. The height exemptions would be simplified.

A. Maximum height established

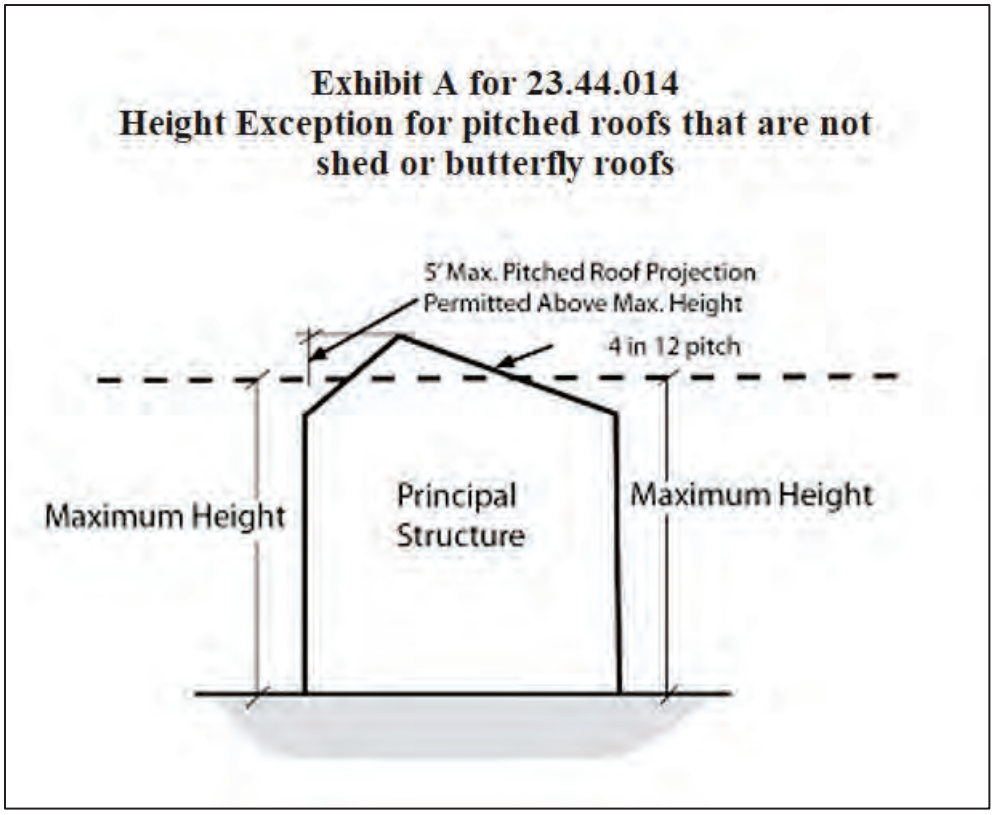
1. Subject to the exceptions allowed in this Section 23.44.014, the height limit for any structure in NR zones is 32 feet.

2. The height limit for accessory structures that are located in required setbacks or separations is 12 feet.

B. Standards for pitched roofs

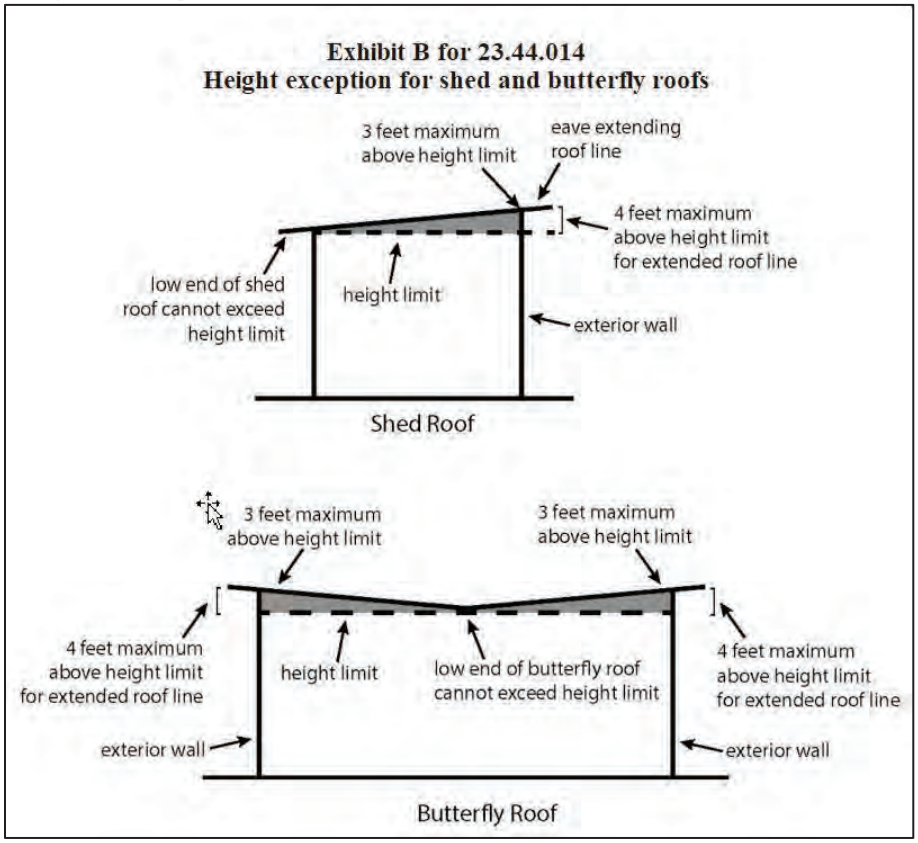
1. The ridge of a pitched roof that is not a shed or butterfly roof on a principal structure may extend up to 5 feet above the maximum height limit, as determined under subsection 23.44.014.A. All parts of the roof above the height limit must be pitched at a rate of not less than 4:12 (see Exhibit A for 23.44.014).

Exhibit A for 23.44.014
Height Exception for pitched roofs that are not shed or butterfly roofs



2. The high side(s) of a shed or butterfly roof may extend 3 feet above the maximum height limit, as determined under subsection 23.44.014.A, provided that the low side(s) of the shed or butterfly roof are no higher than the height limit (see Exhibit B for 23.44.014). The roof line of a shed or butterfly roof may be extended in order to accommodate eaves, provided that the highest point of the roof extension is no more than 4 feet above the height limit.

Exhibit B for 23.44.014
Height exception for shed and butterfly roofs



C. Height limit exceptions

1. Except in the Airport Height Overlay District, Chapter 23.64, flagpoles are exempt from height limits, provided that they are no closer to any adjoining lot line than 50 percent of their height above existing grade, or, if attached only to a roof, no closer than 50 percent of their height above the roof portion where attached.

2. Open railings, planters, greenhouses not dedicated to food production, parapets, and firewalls may extend 4 feet above the height limit in subsection 23.44.014.A. Planters on flat roofs shall not be located within 4 feet of more than 25 percent of the perimeter of the roof.

3. Green roofs may extend 2 feet above the height limit in subsection 23.44.014.A or above a pitched roof allowed in subsection 23.44.014.B.

4. Solar collectors may extend 4 feet above the height limit in subsection 23.44.014.A or above a pitched roof allowed in subsection 23.44.014.B.

5. For nonresidential principal uses, the following rooftop features may extend up to 10 feet above the height limit in subsection 23.44.014.A, as long as the combined total coverage of all features listed in this subsection 23.44.014.C.5 does not exceed 15 percent of the roof area or 20 percent of the roof area if the total includes screened or enclosed mechanical equipment:

a. Stair and elevator penthouses;

b. Mechanical equipment;

c. Wind-driven power generators; or

d. Chimneys.

6. Devices for generating wind power may extend up to 10 feet above the height limit in subsection 23.44.014.A, provided that the combined total coverage of all features does not exceed 15 percent of the roof area.

7. For height limits and exceptions for communication utilities and accessory communication devices, see Section 23.57.010.

8. Buildings existing prior to the date of this ordinance are permitted to extend up to 8 inches above the height limit in subsection 23.44.014.A or a pitched roof allowed in subsection 23.44.014.B solely for the purpose of adding insulation to an existing roof.

23.44.016 Lot coverage

Note: The lot coverage is proposed to be changed from a system that varies with lot size to a single 50% standard. The area of certain Environmentally Critical Areas is proposed to be excluded from lots size for the purpose of calculating density.

A. Except as otherwise provided in this Section 23.44.016, the maximum lot coverage permitted for enclosed principal and accessory structures is 50 percent.

B. Lots abutting alleys. For purposes of computing the lot coverage only:

a. The area of a lot with an alley or alleys abutting any lot line may be increased by one-half of the width of the abutting alley or alleys.

b. The total lot area for any lot may not be increased by the provisions of this Section 23.44.016 by more than ten percent.

C. The following areas shall not be counted in calculating the area of lots for the purpose of calculating lot coverage in this Section 23.44.016:

a. Riparian corridors;

b. Wetlands and their buffers;

c. Submerged lands and areas within the shoreline setback; and

d. Designated non-disturbance area in steep slopes.

D. In calculating lot coverage, the area of enclosed structures shall not include any projections that do not provide floor area if they meet the standards for projections into setbacks in subsection 23.44.018.E. Projections that provide floor area shall be included in the calculation of lot coverage.

E. The lot coverage allowed on lots containing areas listed in subsection 23.44.016.C shall not be less than 625 square feet or an amount of lot coverage approved by the Director through an environmentally critical area reduction, waiver, or modification pursuant to Chapter 25.09, whichever is greater.

23.44.018 Setbacks

Note: Setbacks are proposed to be significantly updated to improve design outcomes for developing using the higher density provisions.

A. Required setbacks for the NR zones are shown in Table A for 23.44.018.

Table A for 23.44.018 Required setbacks in Neighborhood Residential zones	
Front	10 feet
Rear	5 feet for accessory dwelling units and 10 feet for other structures except that, if the rear setback abuts an alley, no rear setback is required
Side	5 feet, except that no side setback is required from a side lot line that abuts an alley

B. Through lots. In the case of a through lot, each setback abutting a street, shall be a front setback. Rear setback provisions shall not apply to the through lot, except pursuant to Section 23.40.030.

C. Other setback requirements. Additional structure setbacks may be required in order to meet the provisions of Chapter 23.53.

D. Underground structures. Underground structures, measured from existing or finished grade, whichever is lower, may be located anywhere on a lot.

E. Projections from an enclosed structure allowed in required setbacks

1. Architectural features such as cornices, eaves, gutters, roofs, fireplaces, chimneys, and other similar features may project into required setbacks a maximum of 2 feet if they are no closer than 3 feet to any lot line.

2. Garden windows and other similar features that do not provide floor area may project a maximum of 18 inches into required setbacks if they:

a. Are a minimum of 30 inches above the finished floor;

b. Are no more than 6 feet in height and 8 feet wide; and

c. Combined with bay windows and other similar features that provide floor area, make up no more than 30 percent of the area of the facade.

3. Bay windows and other similar features that provide floor area may project a maximum of 2 feet into required front and rear setbacks if they:

a. Are no closer than 5 feet to any lot line;

b. Are no more than 10 feet in width; and

c. Combined with garden windows and other projections included in subsection 23.44.018.E.2, make up no more than 30 percent of the area of the facade.

4. Unenclosed porches and steps

a. Unenclosed porches or steps no higher than 4 feet above existing grade, or the grade at the street lot line closest to the porch, whichever is lower, may extend to within 5 feet of a street lot line and 3 feet of a side lot line.

b. Allowed porches or steps may be covered, provided that:

1) No portions of the cover-structure, including any supports, are closer than 5 feet to any lot line;

2) The height of the roof over unenclosed porch or steps shall not exceed 15 feet above existing or finished grade, whichever is lower;

3) The roof over such porches or steps shall not be used as a deck; and

4) The total area of porches attached to any individual dwelling unit and located in the setback is not more than 60 square feet.

F. Exception for structures with ground-floor commercial uses, The ground floor of a structure containing a ground-floor commercial use may extend into one front setback provided it is not located closer than 2 feet from a front lot line.

G. Unenclosed structures allowed in setbacks

1. All structures not more than 18 inches above existing or finished grade, whichever is lower, are allowed in any required setback including but not limited to decks, swimming pools, and hot tubs.

2. Barrier-free access. Access facilities for the disabled and elderly, are allowed in any required setback.

3. Freestanding signs, bike racks, play structures, and similar unenclosed structures that are 6 feet or less in height above existing or finished grade, whichever is lower, are allowed in any required setback or separation, provided that:

a. Signs meet the provisions of Chapter 23.55;

b. Structures located in side yard allow a 2.5-foot-wide pathway through the side yard; and

c. Structures located within 5 feet of a front lot line are not more than 4 feet in height.

4. Fences

a. Fences no greater than 6 feet in height are allowed in any required setback, except that fences in the required front setback extended to side lot lines or in street side setbacks extended to the front and rear lot lines may not exceed 4 feet in height. Fences located on top of a bulkhead or retaining wall are also limited to 4 feet. If a

fence is placed on top of a new bulkhead or retaining wall used to raise grade, the maximum combined height is limited to 9.5 feet.

b. Up to 2 feet of additional height for architectural features such as arbors or trellises on the top of a fence is allowed if the architectural features are predominately open.

c. Fence height may be averaged along sloping grades for each 6-foot-long segment of the fence, but in no case may any portion of the fence exceed 8 feet in height when the height allowed by subsection 23.44.018.F.5.a is 6 feet, or 6 feet in height when the height allowed by subsection 23.44.018.F.5.a is 4 feet.

5. Bulkheads and retaining walls

a. Bulkheads and retaining walls used to raise grade are allowed in any required setback if they are limited to 6 feet in height, measured above existing grade.

b. Bulkheads and retaining walls used to protect a cut into existing grade may not exceed the minimum height necessary to support the cut or 6 feet measured from the finished grade on the low side, whichever is greater. Any fence shall be set back a minimum of 3 feet from such a bulkhead or retaining wall.

6. Mechanical equipment. Heat pumps, charging devices for electric vehicles, and similar mechanical equipment, not including incinerators, are allowed in required setbacks if they not located within 3 feet of any lot line.

7. Access bridges. Uncovered, unenclosed access bridges are allowed as follows:

a. Pedestrian bridges 5 feet or less in width, and of any height necessary for access, are permitted in required setbacks, except that in side setbacks an access bridge must be at least 3 feet from any side lot line.

b. A driveway access bridge is permitted in the required setback abutting the street if necessary for access to parking. The vehicular access bridge shall be no wider than 12 feet for access to one parking space or 22 feet for access to two or more parking spaces and of any height necessary for access. The driveway access bridge may not be located closer than 5 feet to an adjacent property line.

8. Unenclosed structures are allowed in the rear setback provided that the structure is:

a. Not located within 5 feet of a rear lot line that is not an alley lot line;

b. Not more than 12 feet in height; and

c. Separated from a dwelling unit by at least 3 feet, eave to eave.

9. Above-grade stormwater management features, such as bioretention planters and cisterns, are allowed in setbacks if:

a. No feature, excluding piping, is no more than:

1) Twelve feet tall if located in a portion of the rear setback that is not also a side setback; or

2) Six and a half feet tall, if located in other setbacks

b. No feature greater than 4.5 feet tall is located within 10 feet of the front lot line, excluding piping, unless it is integrated into a bulkhead that is allowed in subsection 23.44.018.G.6;

c. No feature is located within 2.5 feet of the side lot line; and

d. The total storage capacity of all above-grade cisterns is no greater than 1,250 gallons.

11. Guardrails or handrails no more than 42 inches are allowed on unenclosed stairs, decks, access bridges, bulkheads, and retaining walls.

H. Enclosed structures allowed in setbacks

1. Any accessory structure that is not a dwelling unit may be constructed in a side or rear setback that abuts the rear or side setback of another lot upon recording with the King County Recorder's Office an agreement to this effect between the owners of record of the abutting properties.

2. A dwelling unit may extend into one side setback if a side setback easement is provided along the side or rear lot line of the abutting lot, sufficient to leave a 10-foot separation between that structure and any dwelling unit on the abutting lot. The 10-foot separation shall be measured from the wall of the dwelling unit that is proposed to extend into a side setback to the wall of the dwelling unit on the abutting lot.

a. No structure or portion of a structure may be built on either lot within the 10-foot separation, except as provided in this Section 23.44.018.

b. Accessory structures, other than dwelling units, and features of and projections from dwelling units, such as porches, eaves, and chimneys, are permitted to project 2 feet into the 10-foot easement area required by this subsection 23.44.018.G if otherwise allowed in side setbacks by this Section 23.44.018. For purposes of calculating the distance a structure or feature may project into the 10-foot separation, assume the property line is 5 feet from the wall of the dwelling unit proposed to extend into a side setback and consider the 5 feet between the wall and the assumed property line to be the required side setback.

c. Notwithstanding subsection 23.44.018.C.3.b, no portion of any structure, including eaves or any other projection, shall cross the actual property line.

d. The side setback easement shall be recorded with the King County Recorder's Office. This easement shall provide access for normal maintenance activities on both properties.

3. Enclosed structures that are not dwelling units are allowed in the rear setback provided that:

a. They are not located within 5 feet of a rear lot line that is not an alley lot line;

b. They are not more than 12 feet in height; and

c. They are separated from a dwelling unit by at least 3 feet.

4. Garages

a. Garages may be located in a setback where parking is allowed in a setback as provided in subsections 23.44.036.C.4 and 23.44.036.C.5.

b. Garages may be located in a required side setback that abuts the rear or side setback of another lot if:

1) The garage is a detached garage and extends only into that portion of a side setback that is either within 40 feet of the centerline of an alley or within 25 feet of any rear lot line that is not an alley lot line; or

2) An agreement between the owners of record of the abutting properties, authorizing the garage in that location, is executed and recorded, pursuant to subsection 23.44.018.H.1.

c. Garages allowed in required setbacks shall comply with all of the following standards:

1) The maximum height is 12 feet, except that the ridge of a pitched roof may extend up to 3 feet above the 12-foot height limit. All parts of the roof above the height limit shall be pitched at a rate of not less than 4:12. No portion of a shed roof is permitted to extend beyond the 12-foot height limit.

2) The area of a garage in front setbacks, is limited to 300 square feet with 14-foot maximum width if one space is provided, and 600 square feet with 24-foot maximum width if two spaces are provided. Access driveway bridges permitted under subsection 23.44.018.C.8.b shall not be included in this calculation.

3) Roof eaves and gutters that project up to 2 feet are excluded from the maximum coverage and size limits.

4) The roof shall not be used as a balcony or deck in rear setbacks.

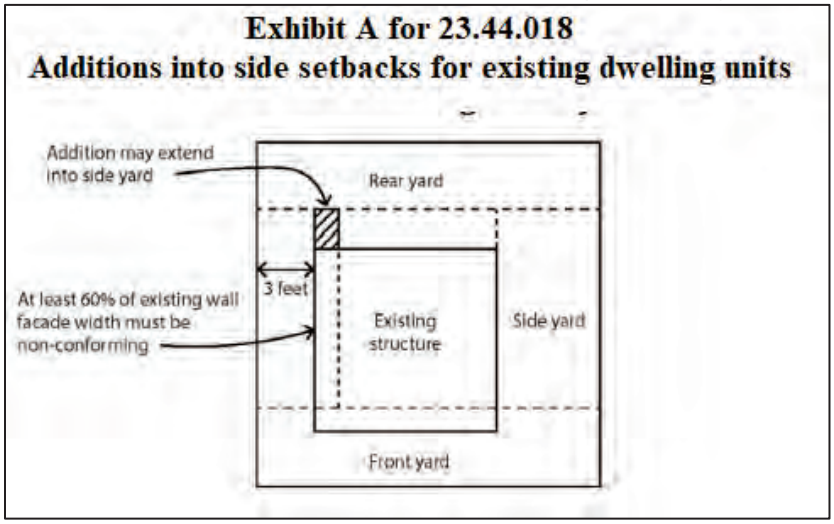
5. An addition to an existing dwelling unit may extend into a required side setback if:

a. The existing dwelling unit is already nonconforming with respect to that setback and the presently nonconforming portion is at least 60 percent of the total width of the respective facade of the structure prior to the addition;

b. The addition would not be located within 3 feet of a side lot line; and

c. The addition would not be located any closer to the side lot line the closest part of the existing structure.

Exhibit A for 23.44.018
Additions into side setbacks for existing dwelling units



I. A structure may be permitted to extend into front and rear setbacks as necessary to protect Tier 1 and Tier 2 trees and trees over 2 feet in diameter pursuant to Section 25.11.070.

23.44.020 Separations between structures

Note: The requirement in this section would be new for NR zones, but is consistent with existing rules in Lowrise zones.

A. The minimum required separation between principal structures is 6 feet except that if the principal structures are separated by a driveway or parking aisle, the minimum required separation between the principal structures is 2 feet greater than the required width of the driveway or parking aisle, provided that the separation is not required to be any greater than 24 feet. If principal structures are separated by a driveway or parking aisle, projections that enclose floor area may extend a maximum of 3 feet into the required separation if they are at least 8 feet above finished grade.

B. Architectural features such as cornices, eaves, gutters, roofs, fireplaces, chimneys, and other forms of weather protection may project into required separations a maximum of 2 feet. Unenclosed structures allowed in side setbacks are allowed in the minimum separation. Garden windows, bay windows, covered porches and patios, balconies, and enclosed structures are not allowed in the required separation. Detached structures that are up to 10 feet in height and used exclusively for bike parking are allowed in required separations.

23.44.022 Amenity area

Note: This would be a new requirement for NR zones.

A. The required amount of amenity area in NR zones is equal to 20 percent of the lot area.

B. All units shall have access to either a common or private amenity area.

C. For attached and detached dwelling units, amenity area required at ground level may be provided as either private or common space. For stacked dwelling units, at least half of the amenity area shall be provided as common space.

D. A minimum of 50 percent of the required amenity area shall be provided at ground level or within 4 feet of existing grade. In calculating the total amount of amenity area, only half of the amenity area that is not provided at ground level or within 4 feet of existing grade shall count.

E. Amenity area shall not be enclosed within a structure.

F. Amenity areas may be covered by weather protection.

G. Each amenity area shall be at least 120 square feet in area and have a minimum width and depth of 8 feet.

H. Projections that do not provide floor area may extend into an amenity area if they meet the standards for projections into setbacks in subsection 23.44.018.E and if garden windows and other similar features are at least 8 feet above finished grade. Projections that provide floor area are not allowed in amenity areas.

I. Vehicular parking areas, vehicular access easements, and driveways do not qualify as amenity areas. Required bike parking and solid waste container storage space cannot be located in amenity areas. Enclosed structures cannot be located in amenity areas. Pathways serving multiple dwelling units cannot be located in private amenity areas.

J. Swimming pools, spas, hot tubs, and similar water features may be counted toward meeting the amenity area requirement.

K. Stormwater management features, such as bioretention planters and cisterns, are allowed in amenity areas.

L. No amenity area is required for one new dwelling unit added to a dwelling unit existing as of January 1, 1982, or for one new dwelling unit added to a multifamily residential use existing as of October 10, 2001.

23.44.024 Tree requirements

Note: The tree requirement for NR zones would be updated to encourage larger species trees. This approach is similar to the approach that was used in RSL zones, which will no longer exist.

A. Development meeting any of the following criteria must plant or retain trees to achieve the number of tree points listed in Table A of 23.44.024:

a. Containing one or more new dwelling units;

b. Containing more than 4,000 square feet of nonresidential uses in either a new structure or an addition to an existing structure; or

c. Expanding surface area parking by more than 20 parking spaces for automobiles.

Table A for 23.44.024 **Number of tree points required**	
Density	**Tree points required per lot area [1]**
Less than 1 unit / 4,000 square feet	1 point / 500 sq ft
1 unit / 4,000 sq ft to 1 unit / 2,201 sq ft	1 point / 600 sq ft
1 unit / 2,200 sq ft to 1 unit / 1,601 sq ft	1 point / 675 sq ft
1 unit / 1,600 sq ft or greater	1 point / 750 sq ft
Footnote to Table A for 23.44.024: [1] For purposes of this Section 23.44.024, lot area shall not include submerged lands.	

B. Individual trees preserved during construction or planted as part of construction, excluding street trees, count toward the tree score according to Table B for 23.44.024. All required trees shall meet standards promulgated by the Director to provide for the long-term health, viability, and coverage of plantings. These standards may include, but are not limited to, the type and size of plants, spacing of plants, depth, and quality of soil, access to light and air, and protection practices during construction. Trees required under Section 25.11.090 shall count toward this standard.

Table B for 23.44.024 Tree points		
Type of tree	**Points for deciduous trees**	**Points for conifer trees**
Small tree planted as part of construction	1 point	1.25 point
Small/medium tree planted as part of construction	2 points	2.5 points
Medium/large tree planted as part of construction	3 points	3.75 points
Large tree planted as part of	4 points	5 points
Trees 6 inches in diameter or greater that are preserved during construction	1 point per inch of diameter	1.25 point per inch of diameter

C. Tree protection areas shall be designated in accordance with 25.11.060 for all trees that are proposed to be preserved to receive points under subsection 23.44.024.B, regardless of tree tier.

D. The owner of the subject lot is required to ensure that the trees planted remain healthy for at least five years after inspection by the City and the owner of the subject lot shall be responsible for replacing any trees that do not remain healthy after inspection by the City.

E. Tree measurements

1. New trees planted to meet this requirement shall meet the following size standards:

a. Deciduous trees with one trunk must be at least 1.5 inches in diameter, measured 6 inches above the ground.

b. Multi-stemmed deciduous trees must have at least 3 stems and be at least 6 feet tall.

c. Evergreen trees must be at least 4 feet tall.

2. Existing trees shall be measured 4.5 feet above the ground.

F. Street tree requirements

1. Street trees are required in NR zones for development that would add one or more principal dwelling units on a lot, except as provided in subsection 23.44.024.C.2 and Section 23.53.015. Existing street trees shall be retained unless the Director of Transportation approves their removal. The Director, in consultation with the Director of Transportation, shall determine the number, type, and placement of additional street trees to be provided in order to:

a. Improve public safety;

b. Promote compatibility with existing street trees;

c. Match trees to the available space in the planting strip;

d. Maintain and expand the urban forest canopy;

e. Encourage healthy growth through appropriate spacing;

f. Protect utilities; and

g. Allow access to the street, buildings, and lot.

2. Exceptions to street tree requirements

a. If a lot borders an unopened right-of-way, the Director may reduce or waive the street tree requirement along that right-of-way as a Type I decision if, after consultation with the Director of Transportation, the Director determines that the right-of-way is unlikely to be opened or improved.

b. If it is not feasible to plant street trees in a right-of-way planting strip, a 5-foot setback shall be planted with trees along the street lot line that abuts the required front setback, or landscaping other than trees shall be provided in the planting strip, subject to approval by the Director of the Seattle Department of Transportation. If a 5-foot setback or landscaped planting strip is not feasible, the Director may reduce or waive this requirement as a Type I decision.

23.44.027 Structure width limits

Note: Structure width limits currently vary by zone. This section represents a simplified approach to structure width limits.

Structure width for each building in Neighborhood Residential zones may not exceed 90 feet. Measurement of structure width is provided in Section 23.86.014.

23.44.029 Design standards

Note: These standards would be a new requirement for NR zones.

The following standards apply to development that includes the construction of new dwelling units, except for new dwelling units contained in existing structures. For the purposes of this Section 23.44.029, requirements for street-facing facades shall only apply to structures located within 40 feet of a street lot line or a vehicle access easement serving ten or more residential units. For structures located within 40 feet of a vehicle access easement serving ten or more residential units but not within 40 feet of street lot line, the street-facing facade shall be the facade that faces the vehicle access easement. If multiple facades face vehicle access easements, the applicant may decide which facade facing a vehicle access easement is considered the street-facing facade.

A. Access. Each unit shall have pedestrian access at least 3 feet in width to the sidewalk or, if no sidewalk exists, the front lot line. This access may be shared or private. This access may be over a driveway and may cross any required setbacks or interior separation. The pedestrian access may be part of a driveway.

B. Entrances. Each structure with a street-facing facade shall have a pedestrian entry on that street-facing facade meeting the following:

1. For stacked dwelling units, at least one pedestrian entry shall be required for the structure as a whole.

2. For attached and detached dwelling units, each individual dwelling with a street-facing facade within 40 feet of the street lot line shall have at least one pedestrian entry on the street-facing facade.

3. For structures or dwelling units on corner lots, a pedestrian entry is required on only one of the street-facing facades.

4. Required pedestrian entry on street-facing facades shall have weather protection, such as a covered porch, canopy, recessed entry or similar feature, measuring at least 3 feet by 3 feet in width and depth for attached and detached dwelling units and at least 6 feet in width and 4 feet in depth for stacked units.

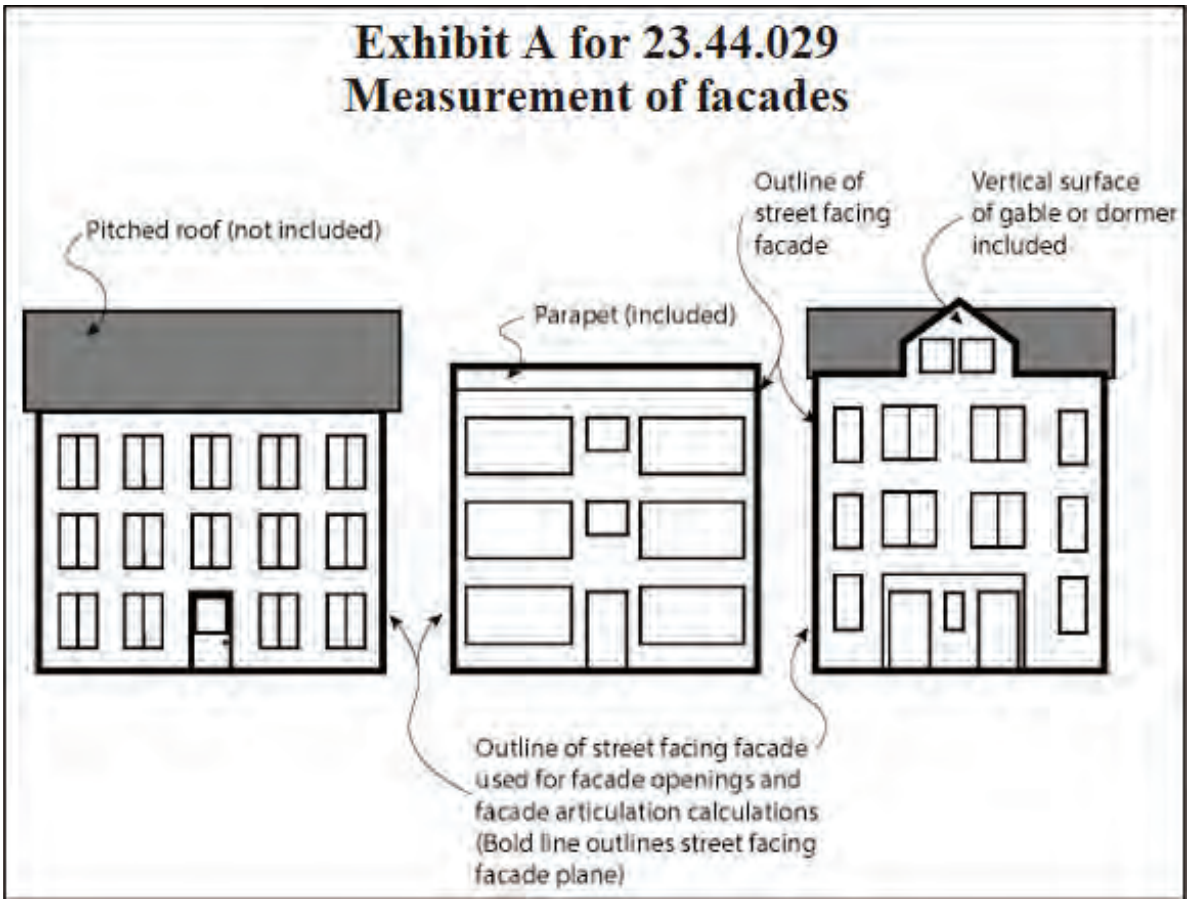
5. For projects with multiple attached or detached dwelling units that are located on a corner lot, at least one pedestrian entry shall be located facing each street.

6. Exception. For attached and detached dwelling units, the pedestrian entry may be located on a wall perpendicular to the street-facing facade provided that the pedestrian entry abuts a covered porch or recessed entry that also abuts the street-facing facade.

C. Windows and doors. At least 20 percent of the area of each street-facing facade shall consist of windows and/or doors. If front and side facades are street-facing, the two facades shall be combined for the purpose of this calculation. Windows count toward the requirement for facade openings in this subsection 23.44.029.C only if they are transparent. Windows composed of garage doors and doors to utility and service areas do not count.

Exhibit A for 23.44.029

Measurement of facades



D. Materials. At least 60 percent of the area of each street-facing facade shall consist of materials that meet any combination of the following elements:

1. Windows and/or doors meeting the standards of subsection 23.44.029.C;

2. Bricks or other masonry materials that are no more than 12 inches in either height or width or brick or stone veneers that provide a similar appearance;

3. Wood slats no more than 16 inches in either height or width;

4. Overlapping boards, shingles, shakes, or similar elements that are no more than 16 inches in either height or width and a minimum of ½ inch in thickness; or

5. Contain indentations or projections with a minimum of ½ inch in depth and a minimum of ½ inch in width every 16 inches or less.

E. The Director may as a type 1 decision allow exceptions to the materials requirements in subsection 23.44.029.D if the Director determines that the design of the street-facing facade including materials, windows, and modulation will meet the intent of subsection 23.44.029.D to provide visual interest and prevent large, uninterrupted wall faces.

Exhibit B for 23.44.029
Measurements for material option

[to be added with final legislation]

23.44.034 Light and glare standards

Note: This section contains an existing standard on exterior lighting that was previously in the General Provisions section and adds a new subsection on screening of parking areas that currently existing in LR zones.

A. Exterior lighting shall be shielded and directed away from adjacent properties. The Director may require that the location of the lighting be changed.

B. To prevent vehicle lights from affecting adjacent properties, driveways and parking areas for more than two vehicles shall be screened from abutting properties by a fence or wall between 5 feet and 6 feet in height, or a solid evergreen hedge or landscaped berm at least 5 feet in height. If the elevation of the lot line is different from the finished elevation of the driveway or parking surface, the difference in elevation may be measured as a portion of the required height of the screen so long as the screen itself is a minimum of 3 feet in height. The Director may waive the requirement for the screening if it is not needed due to changes in topography, agreements to maintain an existing fence, or the nature and location of adjacent uses.

23.44.036 Parking location and access

Note: This section contains existing regulations that have been modified slightly to reflect new setback requirements. We are also proposing a new provision to allow two parking spaces within the front setback under certain circumstances.

A. Parking quantity. Off-street parking is required pursuant to Section 23.54.015.

B. Parking on same lot. Any required parking shall be located on the same lot as the principal use, except that:

1. Parking accessory to a floating home, floating on-water residence, house barge, and vessel with a dwelling unit may be located on another lot if within 600 feet of the lot on which the floating home, floating on-water residence, house barge, and vessel with a dwelling unit is located.

2. Parking accessory to a dwelling unit existing on June 11, 1982, may be established on another lot if all the following conditions are met:

a. There is no vehicular access to permissible parking areas on the lot.

b. Any garage constructed is for no more than two two-axle, or two up to four-wheeled vehicles.

c. Parking is screened or landscaped as required by the Director, who shall consider development patterns of the block or nearby blocks.

d. The lot providing the parking is within the same block or across the alley from the principal use lot.

e. The accessory parking shall be tied to the lot of the principal use by a covenant or other document recorded with the King County Recorder's Office.

C. Location of parking. Except as provided below, parking is not allowed within 20 feet of a street lot line:

1. If access is taken directly from an alley, surface parking may be located within 20 feet of a street lot line if it is located within 28 feet of an alley lot line and is no closer than 7 feet to any street lot line.

2. For lots at least 40 feet in width, up to two surface parking spaces are allowed within 20 feet of a street lot line provided:

a. Access to parking is permitted through the required setback abutting the street by subsection 23.44.036.D;

b. The parking spaces are located perpendicular to the street lot line from which they are accessed;

c. On corner lots, the parking spaces are not located within 20 feet of the street lot line parallel to the parking spaces;

d. No other parking spaces or driveways are located on the lot;

e. The parking spaces are not located within 5 feet of a street lot line; and

f. The combined width of the parking spaces shall not exceed 20 feet.

3. Lots with uphill setbacks abutting streets. In NR zones, parking may be located in a required setback abutting a street provided:

a. The existing grade of the lot slopes upward from the street lot line an average of at least 6 feet above sidewalk grade at a line that is 10 feet from the street lot line; and

b. The parking area shall be at least an average of 6 feet below the existing grade prior to excavation and/or construction at a line that is 10 feet from the street lot line;

c. Access to parking is allowed through the required setback abutting the street by subsection 23.44.036.B;

d. No other parking spaces or driveways are located on the lot;

e. If no garage is provided, the combined width of the parking spaces shall not exceed 20 feet. If a garage is provided, the width of a garage structure shall not exceed 24 feet; and

f. The total width of parking spaces and garages is not more than 60 percent of the width of the lot.

4. Lots with downhill setbacks abutting streets. In NR zones, parking may be located in a required setback abutting a street if the following conditions are met:

a. The existing grade slopes downward from the street lot line that the parking faces;

b. For front setback parking, the lot has a vertical drop of at least 6 feet in the first 10 feet, measured along a line from the midpoint of the front lot line to the midpoint of the rear lot line;

c. Parking is not located in required side setbacks abutting a street;

d. Access to parking is allowed through the required setback abutting the street by subsection 23.44.036.B;

e. No other parking spaces or driveways are located on the lot;

f. If no garage is provided, the combined width of the parking spaces shall not exceed 20 feet. If a garage is provided, the width of a garage structure shall not exceed 24 feet; and

g. The total width of parking spaces and garages is not more than 60 percent of the width of the lot.

6. If access to required parking passes through a required setback, automobiles, motorcycles, and similar vehicles may be parked on the open access located in a required setback.

D. . No more than three vehicles may be parked outdoors per dwelling unit on a lot.

E. Trailers, boats, recreational vehicles, and similar equipment shall not be parked in required front and side setbacks or the first 10 feet of a rear setback measured from the rear lot line, or measured 10 feet from the centerline of an alley if there is an alley adjacent to the rear lot line, unless fully enclosed in a structure otherwise allowed in a required setback by this subsection 23.44.036.D.

F. Access to parking

1. Vehicular access to parking from an improved street, alley, or easement is required if parking is required pursuant to Section 23.54.015.

2. Access to parking is permitted through a required setback abutting a street only if the Director determines that one of the following conditions exists:

a. There is no alley improved to the standards of subsection 23.53.030.B, and there is no unimproved alley in common usage that currently provides access to parking on the lot or to parking on adjacent lots in the same block;

b. Existing topography does not permit alley access;

c. At least 50 percent of alley frontage abuts property in a non-residential zone; or

d. The alley is used for loading or unloading by an existing non-residential use;

e. Due to the relationship of the alley to the street system, use of the alley for parking access would create a significant safety hazard;

f. Parking access must be from the street in order to provide access to a parking space that complies with Chapter 11 of the Seattle Building Code; or

g. Providing alley access would require removal of a tree on private property that is a tier 1 or tier 2 tree and all other applicable criteria for tree protection in Chapter 25.11 are met.

G. Garage entrance width. The total combined horizontal width of all garage entrances on the lot that are located on the front facade may be up to 50 percent of the horizontal width of the front facade or 10 feet, whichever is greater. On corner lots, a garage entrance shall be allowed on only one street-facing facade of each dwelling unit.

23.44.050 Alternative standards for development of affordable units

Note: This section contains an existing affordable housing bonus that applies only to religious organizations as well as the new bonus that could be used by any developer of affordable housing.

A. Development on a lot that meets all of the following criteria may meet the alternative development standards in subsection 23.44.050.B:

1. The lot is located within 1,320 feet of a transit stop or station served by a frequent transit route on the map required by subsection 23.54.015.B.4 at the time the development is vested pursuant to Section 23.76.026; and

2. The development is low-income housing and at least 50% of units are low-income units.

B. Proposed development on a lot meeting the criteria in subsection 23.44.050.A may elect to meet the following development standards in lieu of the standards in subsections 23.44.010.B (floor area), 23.44.012.B (density), and 23.44.014.A (structure height), and Section 23.44.016 (lot coverage):

1. The maximum FAR limit is 1.8. The applicable FAR limit applies to the total chargeable floor area of all structures on the lot.

2. The maximum density limit is 1 unit per 400 square feet.

3. The maximum height limit is 42 feet.

4. The maximum lot coverage is 60 percent.

C. Development on a lot that does not meet the criteria in subsection 23.44.050.A, but meets the following criteria may meet the alternative development standards in subsection 23.44.050.D:

1. The proposed development meets the requirements of Section 23.42.055; and

2. The lot has or abuts a lot with a religious facility or other use accessory to a religious facility or is 10,000 square feet or greater.

D. Proposed development on lots meeting the criteria in subsection 23.44.050.C but not subsection 23.44.050.A may elect to meet a lot coverage of 65 percent in lieu of the standards in Section 23.44.016.

E. Development on a lot that does not meet the criteria in subsection 23.44.050.A and subsection 23.44.050.C, but meets the following criteria may meet the alternative development standards in subsection 23.44.050.F:

1. The lot was created prior to June 6, 2024; and the lot has not been divided by subdivision or short subdivision or modified by unit lot subdivision since June 6, 2024.

2. At least two dwelling units are low-income housing units.

F. Proposed development on lots meeting the criteria in subsection 23.44.050.E but not subsection 23.44.050.A and subsection 23.44.050.C may elect to build up to 6 dwelling units in lieu of the standards in subsection 23.44.012.B.

23.44.078 Parks and open space

Note: This section contains existing regulations.

A. The following accessory uses shall be permitted in any public park when within a structure or on a terrace abutting the structure, provided that when the use is within 100 feet from any lot in a residential zone the use shall be completely enclosed:

1. The sale and consumption of beer and wine during daylight hours;

2. The sale and consumption of alcoholic beverages under a Class H liquor license at municipal golf courses during established hours of operation.

B. The sale and consumption of beer and wine with meals served in a restaurant facility within the boundaries of Woodland Park shall be permitted. The use shall be permitted in only one facility located no closer than 100 feet from any lot in a residential zone and separated from other public activity areas and zoo buildings by at least 50 feet.

C. Storage structures and areas and other structures and activities customarily associated with parks and playgrounds are subject to the following development standards in addition to the general development standards for accessory uses:

1. Any active play area shall be located 30 feet or more from any lot in a Neighborhood Residential zone.

2. Garages and service or storage areas shall be located 100 feet or more from any other lot in a residential zone and obscured from view from each such lot.

Changes to Chapter 23.45 Multifamily

Section 18. Section 23.45.502 of the Seattle Municipal Code, last amended by Ordinance 125791, is amended as follows:

23.45.502 Scope of provisions

Note: This section is being amended so that it is consistent with other scope of provision chapters and to clarify how assisted living facilities, congregate residences, and structures containing ground floor commercial uses are currently being regulated.

A. This Chapter 23.45 establishes regulations for the following zones:

1. Lowrise 1 (LR1);

2. Lowrise 2 (LR2);

3. Lowrise 3 (LR3);

4. Midrise (MR); and

5. Highrise (HR).

B. Zones listed in subsection 23.45.502.A and having an incentive zoning suffix are subject to this Chapter 23.45 and Chapter 23.58A, Incentive Provisions.

C. Some land in these zones may be regulated by Subtitle III, Division 3, Overlay Districts, of this Title 23.

D. Definitions are provided in Chapter 23.84A. Methods for measurements are provided in Chapter 23.86.

E. Other regulations((,)) may apply to development proposals including but not limited to general use provisions (Chapter 23.42); transportation concurrency and

transportation impact mitigation (Chapter 23.52); requirements for streets, alleys, and easements (Chapter 23.53); standards for parking quantity, access, and design (Chapter 23.54); standards for solid waste storage (Chapter 23.54); sign((~~s~~)) regulations (Chapter 23.55); communication regulations (Chapter 23.57); shoreline regulations (Chapter 23.60A); and environmental protection and historic preservation (Title 25) ((~~and methods for measurements (Chapter 23.86), may apply to development proposals~~)).

F. Assisted living facilities, congregate residences, and structures containing ground floor commercial uses shall meet the development standards for stacked units unless otherwise specified. Congregate residences are subject to additional requirements as specified in Section 23.42.049.

Section 19. Section 23.45.504 of the Seattle Municipal Code, last amended by Ordinance 127098, is amended as follows:

23.45.504 Permitted and prohibited uses

Note: This section is being amended to allow corner stores and to clarify existing regulations.

A. All uses are permitted outright, prohibited, or permitted as a conditional use according to Table A for 23.45.504 and this Section 23.45.504. Uses not referred to in Table A for 23.45.504 are prohibited, unless otherwise indicated in this Chapter 23.45 or Chapters 23.51A, 23.51B, or 23.57. Communication utilities and accessory communication devices, except as exempted in Section 23.57.002, are subject to the regulations in this Chapter 23.45 and additional regulations in Chapter 23.57. Public facilities are subject to the regulations in Section 23.51A.004.

B. All permitted uses are allowed as a principal use or as an accessory use, unless otherwise indicated in this Chapter 23.45.

Table A for 23.45.504 Permitted and prohibited uses		
Uses	**Permitted and prohibited uses by zone**	
	LR1, LR2, and LR3	**MR and HR**
A. All residential uses	P	P
B. Institutions	P/CU [1]	P/CU [1]
C. Uses in existing or former public schools		
C.1. Child care centers, preschools, public or private schools, educational and vocational training for the disabled, adult evening education classes, nonprofit libraries, community centers, community programs for the elderly, and similar uses in existing or former public schools	P	P
C.2. Other non-school uses in existing or former public schools	Permitted pursuant to procedures established in Chapter 23.78	Permitted pursuant to procedures established in Chapter 23.78
D. Park and ride facilities		
D.1. Park and ride facilities on surface parking lots	X/CU [2]	X/CU [2]
D.2. Park and ride facilities in parking garages	X/P [3]	X/P [3`]
E. Parks and ((~~playgrounds including customary~~)) open space uses	P	P
F. Ground-floor commercial uses	RC/P [4]	RC/P ((4)) ,5
G. Medical service uses other than permitted ground-floor commercial uses	P/X [6]	P/CU/X [6]

Table A for 23.45.504 Permitted and prohibited uses		
Uses	**Permitted and prohibited uses by zone**	
	LR1, LR2, and LR3	**MR and HR**
H. Uses not otherwise permitted in Landmark structures	CU	CU
I. Cemeteries	P/X [7]	P/X [7]
J. Community gardens	P	P
K. Parking, flexible-use	X/P [8]	P [8]
L. Heat recovery incinerators	CU	CU
M. Human service use	P	P
((~~L~~))N. All other uses	X	X

Key to Table A for 23.45.504
P = Permitted outright
CU = Permitted as an Administrative Conditional Use
RC = Permitted in areas zoned Residential Commercial (RC), and subject to the provisions of the RC zone, Chapter 23.46
X = Prohibited
Footnotes to Table A for 23.45.504

[1] Institutions meeting development standards are permitted outright; all others are administrative conditional uses pursuant to Section 23.45.506. The provisions of this Chapter 23.45 shall apply to Major Institution uses as provided in Chapter 23.69.

[2] Prohibited in Station Area Overlay Districts (SAODs); otherwise, permitted as an administrative conditional use pursuant to Section 23.45.506 on surface parking existing as of January 1, 2017.

[3] Prohibited in LR1 and LR2 zones, including LR1/RC and LR2/RC. Permitted outright in LR3, MR, HR, and LR3/RC zones, except prohibited in the SAOD.

[4] Permitted in development that meets the requirements of Section 23.42.055 and Chapter 23.46 or in development that meets the standards of subsection 23.45.504.D even if it is not located in a zone that includes an RC designation

Table A for 23.45.504 Permitted and prohibited uses		
Uses	**Permitted and prohibited uses by zone**	
	LR1, LR2, and LR3	**MR and HR**
[5] Subject to subsection 23.45.504.E except in zones that include an RC designation. [6] Subject to subsections 23.45.504.G and 23.45.506.F. [7] Subject to subsection 23.45.504.F. [8] Prohibited in LR1 and LR2 zones. Permitted outright in all other multifamily zones as surface parking on surface parking lots existing as of January 1, 2017; permitted outright in garages; subject to Section 23.54.026. ((~~P = Permitted outright~~ ~~CU = Permitted as an Administrative Conditional Use~~ ~~RC = Permitted in areas zoned Residential Commercial (RC), and subject to the provisions of the RC zone, Chapter 23.46~~ ~~X = Prohibited~~))		

C. Accessory uses. The following accessory uses are permitted in all multifamily zones, subject to the standards in Section 23.45.545, if applicable:

1. Private garages and carports;

2. Private, permanent swimming pools, hot tubs, and other similar uses;

3. Solar collectors, including solar greenhouses;

4. ((~~Open wet moorage accessory to residential structures;~~)) Piers and floats, provided they comply with the requirements of Chapter 23.60A;

5. Uses accessory to parks and playgrounds, pursuant to Section 23.45.578;

6. Bed and breakfasts in a dwelling unit that is at least five years old, provided they comply with the requirements of subsection 23.45.504.I;

7. Recycling collection stations;

8. Urban farms with planting area not more than 4,000 square feet. Urban farms with greater than 4,000 square feet of planting area may be allowed as an

administrative conditional use to any use permitted outright or as a conditional use. The Director may grant, condition or deny a conditional use permit in accordance with subsection 23.42.051.B; and

9. Accessory dwelling units consistent with Section 23.42.025.

D. ((~~Heat recovery incinerators may be permitted as accessory administrative conditional uses, pursuant to Section 23.45.506.~~)) Ground-floor commercial use in Lowrise zones

1. The commercial use is located on a corner lot.

2. The commercial use is limited to the following:

a. Food processing and craft work;

b. General sales and services; and

c. Restaurants.

3. The commercial uses do not occupy more than 2,500 square feet.

4. The commercial use is permitted only on or below the ground floor of a structure. On sloping lots, the commercial use may be located at more than one level within the structure as long as the floor area in commercial use does not exceed the area of the structure's footprint.

5. Vents for venting of odors, vapors, smoke, gas and fumes, and exterior heat exchangers and other similar devices (e.g., related to ventilation, air conditioning, refrigeration) shall be at least 10 feet above finished sidewalk grade and directed away to the extent possible from residential uses within 50 feet of the vent.

6. Drive-in businesses are prohibited as a principal or accessory use.

7. Outdoor sales and/or service of food or beverages must be located at least 50 feet from adjacent lots.

8. Businesses may not be open between the hours of 10 p.m. and 7 a.m.

E. Ground-floor commercial use in Midrise and Highrise zones

1. Drive-in businesses are prohibited((,)) as either a principal or accessory use.

2. The following uses are permitted as ground-floor commercial uses in MR and HR zones pursuant to Section 23.45.532:

a. Business support services;

b. Food processing and craft work;

c. General sales and services;

d. Medical services;

e. Offices;

f. Restaurants; and

g. Live-work with one of the uses permitted in this subsection 23.45.504.E as the permitted commercial use.

F. Existing cemeteries are permitted to continue in use. New cemeteries are prohibited and existing cemeteries are prohibited from expanding. For purposes of this Section 23.45.504, a change in a cemetery boundary is not considered an expansion in size and is permitted provided that:

1. The change does not increase the net land area occupied by the cemetery;

2. The land being added to the cemetery is contiguous to the existing cemetery and is not separated from the existing cemetery by a public street or alley whether or not improved; and

3. The use of the land being added to the cemetery will not result in the loss of housing.

G. Except as provided in subsections 23.45.504.G.1 and 23.45.504.G.2 below, medical service uses other than permitted ground-floor commercial uses are prohibited.

1. Medical service uses in HR zones may be permitted as administrative conditional uses pursuant to subsection 23.45.506.F.

2. Medical service uses meeting the development standards for institutions are permitted outright on property conveyed by a deed from the City that, at the time of conveyance, restricted the property's use to a health care or health-related facility.

H. Fences and free-standing walls of utility services uses shall be set back from the street lot line by an average of 7 feet and be no less than 5 feet from the street lot line at any point. Landscaping shall be provided between the fence or wall and the street lot line. The Director may reduce this setback after finding that the reduced setback will not significantly increase project impacts, including but not limited to noise, odor, and the scale of the structure in relation to nearby buildings. Acceptable methods to reduce fence or wall impacts include changes in the height, design or construction of the fence or wall, including the use of materials, architectural detailing, artwork, vegetated trellises, decorative fencing, or similar features to provide visual interest facing the street lot line. Fences and walls may obstruct or allow views to the interior of a site. Where site dimensions and conditions allow, applicants are encouraged to provide both a landscaped setback between the fence or wall and the right-of-way, and a fence or wall that provides visual interest facing the street lot line, through the height, design, or construction of the fence or wall, including the use of materials, architectural detailing, artwork, vegetated trellises, decorative fencing, or similar features.

I. Bed and breakfast uses. A bed and breakfast use may be operated under the following conditions:

1. The bed and breakfast use has a valid business license tax certificate issued by the Department of Finance and Administrative Services;

2. All operators of bed and breakfast uses who use a short-term rental platform for listing the bed and breakfast shall have a valid short-term rental operator's license issued by the Department of Finance and Administrative Services.

3. The bed and breakfast use shall be operated by the primary resident of the dwelling unit where the bed and breakfast is located or the resident operator;

4. There shall be no evidence of a bed and breakfast use visible from the exterior of the dwelling unit other than a sign permitted by subsection 23.55.022.D.1; and

5. A bed and breakfast use may be located in a dwelling unit or an accessory dwelling unit.

Section 20. Section 23.45.508 of the Seattle Municipal Code, last amended by Ordinance 127098, is amended as follows:

23.45.508 General provisions

Note: This section is amended to move certain references to the section on scope of provisions, similar to NR zones, and to use language consistent with new definitions for building types.

A. Except for structures related to an urban farm, a structure occupied by a permitted use other than a residential use may be partially or wholly converted to a residential use even if the structure does not conform to the development standards for residential uses in multifamily zones.

B. ((~~Off street parking shall be provided pursuant to Section 23.54.015, and as permitted by provisions of Sections 23.45.504 and 23.45.506, if applicable.~~

~~C.~~)) Expansions of nonconforming converted structures and conversions of structures occupied by nonconforming uses are regulated by Sections 23.42.108 and 23.42.110.

((~~D. Methods for measurements are provided in Chapter 23.86. Requirements for streets, alleys and easements are provided in Chapter 23.53. Standards for parking and access and design are provided in Chapter 23.54. Standards for solid waste and recyclable materials storage space are provided in Section 23.54.040. Standards for signs are provided in Chapter 23.55.~~))

((~~E~~)) C. Assisted living facilities, congregate residences, nursing homes, and structures containing ground floor commercial uses as allowed by Chapter 23.46 in RC zones shall meet the development standards for ((~~apartments~~)) stacked dwelling units unless otherwise specified.

((~~F. Single-family dwelling units. In LR zones, single-family dwelling units shall meet the development standards for townhouse developments, except as otherwise provided. In MR and HR zones, single-family dwelling units shall meet the development standards of the zone.~~

~~G. Proposed uses in all multifamily zones are subject to the transportation concurrency level-of-service standards prescribed in Chapter 23.52.~~))

((~~H~~)) D. Lots with no street frontage. For purposes of structure width, depth, and setbacks, multifamily zoned lots that have no street frontage are subject to the following:

1. For lots that have only one alley lot line, the alley lot line shall be treated as a front lot line.

2. For lots that have more than one alley lot line, the Director shall determine which alley lot line shall be treated as the front lot line.

3. For lots that have no alley lot lines, the applicant may choose the front lot line provided that the selected front lot line length is at least 50 percent of the width of the lot.

((I)) E. Any other provision of the Seattle Municipal Code notwithstanding, an applicant is not entitled to a permit for any use or development on a lot in an LR zone that would be inconsistent with any term, condition, or restriction contained either in any recorded agreement that is in effect as to that lot and was made in connection with a rezone of the lot to LDT, L1, L2, L3, or L4, or in any City Council decision or ordinance related to a rezone of the lot to LDT, L1, L2, L3, or L4 conditioned on a recorded agreement prior to April 19, 2011.

((J)) F. If more than one category of residential use is located on a lot, and if different development standards apply to the different categories of use, then each category's percentage of the total limit imposed by the development standard shall be calculated based on each category's percentage of total structure footprint area, as follows:

1. Calculate the footprint, in square feet, for each category of residential use. For purposes of this calculation, "footprint" is defined as the horizontal area enclosed by the exterior walls of the structure.

2. Calculate the total square feet of footprint of all categories of residential uses on the lot.

3. Divide the square footage of the footprint for each category of residential structure in subsection ((~~23.45.508.J.1~~)) 23.45.508.F.1 by the total square feet of footprints of all residential uses in subsection ((~~23.45.508.J.2~~)) 23.45.508.F.2.

4. Multiply the percentage calculated in subsection ((~~23.45.508.J.3~~)) 23.45.508.F.3 for each housing category by the area of the lot. The result is the area of the lot devoted to each housing category.

5. The total limit for each category of residential use is the applicable limit for that use multiplied by the percentage calculated in subsection ((~~23.45.508.J.4~~)) 23.45.508.F.4.

((~~K~~)) G. Unless otherwise specified, the development standards of each zone shall be applied in that zone, and may not be used in any other zone, except that if both zones have the same development standards, the development standard shall be applied to the

lot as a whole. If a lot or development site includes more than one zoning designation and a development standard is based on lot area, the lot area used in applying the development standard shall be the portion of the contiguous area with the corresponding zoning designation.

Section 21. Section 23.45.510 of the Seattle Municipal Code, last amended by Ordinance 127099, is amended as follows:

23.45.510 Floor area

Note: This section is being edited to be consistent with the new residential use definitions and to implement bonuses for stacked flats in LR1 and LR2 zones, consistent with bonuses proposed for NR zones.

A. Gross floor area. In multifamily zones, gross floor area includes exterior corridors, breezeways, and stairways that provide building circulation and access to dwelling units or sleeping rooms. Balconies, patios, and decks that are associated with a single dwelling unit or sleeping room and that are not used for common circulation((~~, and ground-level walking paths,~~)) are not considered gross floor area.

B. Floor area ratio (FAR) limits in LR and MR zones. FAR limits apply in LR and MR zones as shown in Table A for 23.45.510, provided that if the LR zone designation includes an incentive zoning suffix, then gross floor area may exceed the base FAR as identified in the suffix designation, up to the limits shown in Table A for 23.45.510, if the applicant complies with Chapter 23.58A, Incentive Provisions. The applicable FAR limit applies to the total chargeable floor area of all structures on the lot.

Table A for 23.45.510
FAR limits in LR and MR zones

Zone	Zones with an MHA suffix	Zones without an MHA suffix
LR1	1.3, except 1.5 for stacked dwelling units	1.0
LR2	1.4, except 1.6 for stacked dwelling units [1]	1.1

Table A for 23.45.510 FAR limits in LR and MR zones		
Zone	**Zones with an MHA suffix**	**Zones without an MHA suffix**
LR3 outside urban centers and urban villages	1.8	1.2, except 1.3 for ((~~apartments~~)) stacked dwelling units
LR3 inside urban centers and urban villages	2.3	1.2, except 1.5 for ((~~apartments~~)) stacked dwelling units
MR	4.5	3.2
Footnote to Table A for 23.45.510 [1] Except that the FAR is ((~~1.6~~)) 1.8 for ((~~apartments~~)) stacked dwelling units that provide one or more outdoor amenity areas meeting the requirements of Section 23.45.522 and the following provisions are met: 1. The total amount of, outdoor amenity area is equal to at least 35 percent of the lot area; 2. No part of such amenity area has a width or depth of less than 20 feet; and 3. The outdoor amenity area is located at ground level or within 4 feet of finished grade.		

C. FAR limits in HR zones. FAR limits apply in HR zones as shown in Table B for 23.45.510. The applicable FAR limit applies to the total chargeable floor area of all structures on the lot. All floor area above the base FAR, up to the maximum FAR, is considered extra floor area achievable through the provisions of Section 23.45.516 and Chapter 23.58A.

Table B for 23.45.510 FAR limits in HR zones	
Base FAR	7
Maximum FAR, allowed pursuant to Section 23.45.516 and Chapter 23.58A	15

D. The following floor area is exempt from FAR limits:

1. All stories, or portions of stories, that are underground.

2. The floor area in a Landmark structure subject to controls and incentives imposed by a designating ordinance, if the owner of the Landmark has executed and recorded an agreement acceptable in form and content to the Landmarks Preservation Board, providing for the restoration and maintenance of the historically significant features of the structure, except that this exemption does not apply to a lot from which a transfer of development potential (TDP) has been made under Chapter 23.58A, and does not apply for purposes of determining TDP available for transfer under Chapter 23.58A.

3. The floor area in structures built prior to January 1, 1982, as ((~~single-family~~)) detached dwelling units that will remain in residential use, regardless of the number of dwelling units within the existing structure, provided that:

a. No other principal structure is located between the existing residential structure and the street lot line along at least one street frontage. If the existing residential structure is moved on the lot, the floor area of the existing residential structure remains exempt if it continues to meet this provision; and

b. The exemption is limited to the gross floor area in the existing residential structure as of January 1, 1982.

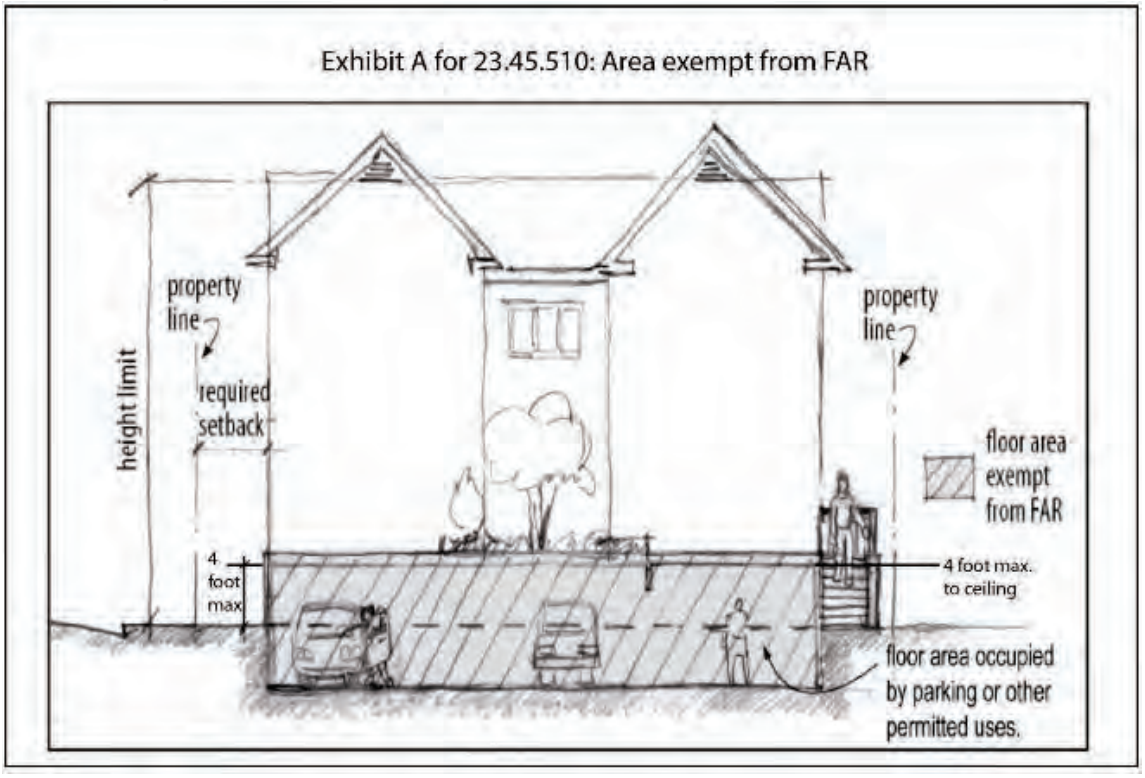
4. Portions of a story that extend no more than 4 feet above existing or finished grade, whichever is lower, excluding access, (see Exhibit A for 23.45.510), in the following circumstances:

a. ((~~All residential structures~~)) Stacked dwelling units in LR zones ((~~except as provided in subsection 23.45.510.D.4.b~~));

b. ((S~~ingle family, cottage housing, rowhouse, and townhouse developments~~)) Attached and detached dwelling units in LR zones, provided that all parking is located at the rear of the structure or is enclosed in structures with garage entrances located on the rear facade; and

c. All ((~~multifamily structures~~)) dwelling units in MR and HR zones.

Exhibit A for 23.45.510
Area exempt from FAR



5. ((~~For rowhouse and townhouse developments and apartments, f~~)) Floor area within a story, or portion of a story, that is partially above grade if all of the following conditions are met:

a. The story, or portion of the story, that is partially above grade is used for parking or other accessory uses and has no additional stories above;

b. The average height of the exterior walls enclosing the floor area does not exceed one story, measured from existing or finished grade, whichever is lower;

c. The roof area above the exempt floor area is predominantly flat, is used as amenity area, and meets the standards for amenity area at ground level in Section 23.45.522; and

d. At least 25 percent of the perimeter of the amenity area on the roof above the floor area is not enclosed by the walls of the structure.

6. Enclosed common amenity area in HR zones.

7. As an allowance for mechanical equipment, in any structure more than 85 feet in height, 3.5 percent of the gross floor area that is not otherwise exempt under this subsection 23.45.510.D.

8. In HR zones, ground floor commercial uses meeting the requirements of Section 23.45.532, if the street level of the structure containing the commercial uses has a minimum floor-to-floor height of 13 feet and a minimum depth of 15 feet.

9. The floor area of required bicycle parking for small efficiency dwelling units or congregate residence sleeping rooms, if the bicycle parking is located within the structure containing the small efficiency dwelling units or congregate residence sleeping rooms. Floor area of bicycle parking that is provided beyond the required bicycle parking is not exempt from FAR limits.

10. Common walls separating individual ((~~rowhouse and townhouse~~)) attached dwelling units.

11. In the Northgate Urban Center, up to 15,000 square feet of floor area in residential use in a structure built prior to 1990 that is located on a split-zoned lot of at least 40,000 square feet in size.

12. In MR and HR zones, all gross floor area in child care centers.

13. In low-income housing, all gross floor area for accessory human service uses.

E. If TDP is transferred from a lot pursuant to Section 23.58A.042, the amount of non-exempt floor area that may be permitted is an FAR of 7, plus any net amount of TDP previously transferred to the lot, minus the sum of the existing non-exempt floor area on the lot and the amount of TDP transferred.

Section 22. Section 23.45.512 of the Seattle Municipal Code, last amended by Ordinance 126855, is amended as follows:

23.45.512 ((~~Density~~)) Minimum lot size and density limits ((~~and family-size unit requirements~~)) —LR zones

Note: This section is edited to comply with the density requirement of HB 1110. The area of certain Environmentally Critical Areas is proposed to be excluded from lots size for the purpose of calculating density.

((~~A. Density limits~~

~~1. Except according to subsection 23.45.512.A.4, the following developments must meet the density limits described in this subsection 23.45.512.A:~~

~~a. In LR1 zones, rowhouse development on interior lots and all townhouse development; and~~

~~b. All development in Lowrise zones that do not have a mandatory housing affordability suffix.~~

~~2. Development described in subsection 23.45.512.A.1~~))

A. Except as provided in subsection 23.44.012.E, the minimum lot size in Lowrise zones is 1,150 square feet.

B. Except as provided in subsection 23.44.012.C and 23.44.012.E, attached and detached dwelling units in LR1 zones and all units in Lowrise zones that do not have a mandatory housing affordability suffix shall not exceed a density of one dwelling unit per 1,150 square feet of lot area ((~~, except that apartments in LR3 zones that do not have a mandatory housing affordability suffix shall not exceed a density limit of one dwelling unit per 800 square feet~~)).

((~~3. When density calculations result in a fraction of a unit, any fraction up to and including 0.85 constitutes zero additional units, and any fraction over 0.85 constitutes one additional unit.~~

~~4. Low-income housing shall have a maximum density of one dwelling unit per 400 square feet of lot area.~~

~~B. Family-sized unit requirements in LR1 zones~~

~~1. Apartment developments in LR1 zones with four or more units shall provide at least one unit with two or more bedrooms and a minimum net unit area of 850 square feet for every four units in the structure.~~

~~2. One unit with three or more bedrooms and a minimum net unit area of 1,050 square feet may be provided in place of any two units required to include two bedrooms and a minimum net unit area of 850 square feet.~~))

C. Exceptions to density limit

1. At least one unit is allowed on all lots existing as of June 6, 2024.

2. Nursing homes, low income housing, congregate housing, and assisted living facilities((~~, and accessory dwelling units that meet the standards of Section 23.45.545~~)) are exempt from the density limit ((~~set in subsection 23.45.512.A and the requirements~~)) in subsection 23.45.512.B)).

((~~D~~)) 3. Dwelling unit(s) located in structures built prior to January 1, 1982, as ((~~single-family~~)) detached dwelling units that will remain in residential use are exempt from the density limit((~~s~~)) in subsection 23.45.512.B.

((~~E. If dedication of right-of-way is required, permitted density shall be calculated before the dedication is made.~~))

4. Attached dwelling units on corner lots that are 6,000 square feet or less are exempt from the density limit in subsection 23.45.512.B.

5. A lot that does not meet the minimum size necessary for four dwelling units under subsection 23.44.012.B may be developed with up to four dwelling units if the lot meets the following criteria:

a. The lot was in existence as a legal building site prior to June 6, 2024;

b. The lot has not been divided through a subdivision or short subdivision or modified by unit lot subdivision since June 6, 2024; and

c. The lot does not contain any riparian corridors; wetlands and their buffers; or submerged lands and areas within the shoreline setback; and steep slopes.

6. Notwithstanding subsection 23.44.012.D.1, a lot that does not meet the minimum size necessary for six units under subsection 23.44.012.B may be developed with up to six units if the lot meets the following criteria:

a. The lot is located within one-quarter mile walking distance of a major transit stop;

b. The lot was in existence as a legal building site prior to June 6, 2024;

c. The lot has not been divided through a subdivision or short subdivision or modified by unit lot subdivision since June 6, 2024; and

d. The lot does not contain any riparian corridors; wetlands and their buffers; or submerged lands and areas within the shoreline setback; and steep slopes.

((~~F~~)) 7. Adding units to existing structures

1. One additional dwelling unit may be added to an existing residential structure regardless of the density restrictions in subsection 23.45.512.A ((~~and~~

~~the requirements in subsection 23.45.512.B~~)). An additional unit is allowed only if the proposed additional unit is to be located entirely within an existing structure, and no additional floor area to accommodate the new unit is proposed to be added to the existing structure.

2. For the purposes of this subsection ((~~23.45.512.F~~)) 23.45.512.C.7, "existing residential structures" are those that were established under permit as of October 31, 2001, or for which a permit has been granted and the permit has not expired as of October 31, 2001.

8. Accessory dwelling units are exempt from the density limit if they meet the following criteria:

a. The accessory dwelling units are accessory to an attached dwelling unit.

b. There is not more than one accessory dwelling unit per principal dwelling unit.

c. The gross floor area of each accessory dwelling unit is 650 square feet or less.

d. The accessory dwelling unit is located completely within the ground floor of the same structure as the principal unit.

D. Measurement of maximum density

1. When calculation of the number of dwelling units allowed results in a fraction of a unit, any fraction shall be rounded down.

2. If dedication of right-of-way is required, permitted density shall be calculated before the dedication is made.

3. In the case of unit lot subdivision, the density limit shall be applied to the parent lot as a whole.

4. Areas not counted in calculating the lot size

a. The following areas shall not be counted in calculating the area of lots for the purpose of calculating minimum lot size in subsection 23.45.512.A and maximum density in this subsection 23.45.512.B:

1) Riparian corridors;

2) Wetlands and their buffers;

3) Submerged lands and areas within the shoreline setback; and

4) Designated non-disturbance area in steep slopes.

Section 23. Section 23.45.514 of the Seattle Municipal Code, last amended by Ordinance 126685, is amended as follows:

23.45.514 Structure height

Note: This section is being updated to reflect updated definitions for housing types, remove structure height limits for ADUs, and increase height limit for attached and detached dwelling units from 30 to 32 feet consistent with NR zones.

A. Subject to the additions and exceptions allowed as set forth in this Section 23.45.514, the height limits for structures in LR zones are as shown on Table A for 23.45.514.

Table A for 23.45.514
Structure height for LR zones (in feet)

((~~Housing~~)) Dwelling Unit type	**LR1**	**LR2**	**LR3 outside urban centers, urban villages, and Station Area Overlay Districts**	**LR3 in urban centers, urban villages, and Station Area Overlay Districts**
((~~Cottage housing developments~~	~~22~~	~~22~~	~~22~~	~~22~~))
((~~Rowhouse and townhouse developments~~)) Attached and detached dwelling units	((~~30~~)) 32	40 [1]	40 [1]	50 [1]
((~~Apartments~~)) Stacked dwelling units	((~~30~~)) 32	40 [1]	40 [1]	50 [2]

Footnotes for Table A for 23.45.514
[1] Except that the height limit is ((~~30~~)) 32 feet in zones without a mandatory housing affordability suffix.

Table A for 23.45.514 **Structure height for LR zones (in feet)**				
((~~Housing~~)) Dwelling Unit type	**LR1**	**LR2**	**LR3 outside urban centers, urban villages, and Station Area Overlay Districts**	**LR3 in urban centers, urban villages, and Station Area Overlay Districts**
[2] Except that the height limit is 40 feet in zones without a mandatory housing affordability suffix.				

* * *

Section 24. Section 23.45.518 of the Seattle Municipal Code, last amended by Ordinance 126685, is amended as follows:

23.45.518 Setbacks ((~~and separations~~))

Note: This section is proposed to be updated to implement the requirements of HB1110 that standards for middle housing can't be more restrictive than for detached homes and to simplify the code.

A. LR zones

1. Required setbacks for the LR zones are as shown in Table A for 23.45.518 and subsection 23.45.518.A.2.

((~~Table A for 23.45.518~~ **~~Required setbacks in LR zones measured in feet~~**				
~~All LR zones~~	**~~Category of residential use~~**			
~~Setback~~	~~Cottage housing developments and single-family dwelling units~~	~~Rowhouse developments~~	~~Townhouse developments~~	~~Apartments~~

((~~Table A for 23.45.518~~ ~~Required setbacks in LR zones measured in feet~~				
~~All LR zones~~	~~Category of residential use~~			
~~Front~~	~~7 average;~~ ~~5 minimum~~	~~5 minimum~~	~~7 average;~~ ~~5 minimum~~	~~5 minimum~~
~~Rear~~	~~0 with alley;~~ ~~7 if no alley~~	~~0 with alley;~~ ~~With no alley:~~ ~~7 average;~~ ~~5 minimum~~	~~7 average;~~ ~~5 minimum~~	~~10 minimum with alley;~~ ~~15 minimum if no alley~~
~~Side setback for facades 40 feet or less in length~~ [1]	~~5~~	~~0 where abutting another rowhouse development~~ [2]~~,~~ ~~otherwise 3.5,~~ ~~except that on side lot lines that abut a neighborhood residential zone, the setback is 5~~	~~5~~	~~5~~
~~Side setback for facades greater than 40 feet in length~~ [3]	~~5 minimum~~	~~0 where abutting another rowhouse development~~ [2]~~,~~ ~~otherwise 3.5,~~ ~~except that on side lot lines that abut a neighborhood residential zone, the setback is 7 average;~~ ~~5 minimum~~	~~7 average;~~ ~~5 minimum~~	~~7 average;~~ ~~5 minimum~~
~~Footnotes to Table A for 23.45.518~~ ~~[1] Additions to existing nonconforming structures built prior to April 11, 2011, shall be set back a sufficient distance so that the addition complies with setback standards. For any portion of a structure built before April 11, 2011, the average setback applies only to~~				

((~~Table A for 23.45.518~~ ~~Required setbacks in LR zones measured in feet~~	
~~All LR zones~~	~~Category of residential use~~
~~a new addition built after that date. If an addition is to a side wall extended vertically, the existing side wall line may be continued by the addition, provided that the average setback of 7 feet or the 5-foot minimum setback is met.~~ ~~[2] If the side facades of rowhouse developments on abutting lots are not joined, then a 3.5-foot setback is required, except the side setback may be reduced to zero if the abutting lot contains a rowhouse development and an easement is provided along the shared lot line of the abutting lot sufficient to leave a 3.5-foot separation between the principal structures of the abutting rowhouse developments.~~ ~~[3] Portions of structures that qualify for the FAR exemption in subsection 23.45.510.D.5 are not considered part of the facade length for the purposes of determining the side setback requirement.))~~	

Table A for 23.45.518 **Required setbacks in Lowrise zones**	
Front	7 feet average, 5 feet minimum
Rear	If rear setback abuts an alley, 0 feet Otherwise, 7 feet average, 5 feet minimum
Side	5 feet

2. Upper-level setbacks in LR2 and LR3 zones

a. An upper-level setback of 12 feet from the front lot line is required for all portions of a structure above the following height:

1) Forty-four feet for zones with a height limit of 40 feet; and

2) Fifty-four feet for zones with a height limit of 50 feet.

b. An upper-level setback of 12 feet from each side or rear lot line that abuts a lot zoned ((~~single-family~~)) Neighborhood Residential is required for all portions of the structure above 34 feet in height.

c. Projections allowed in subsection 23.45.518.H are allowed in upper-level setbacks.

d. Structures allowed in subsection 23.45.518.I are not allowed in upper-level setbacks.

e. Rooftop features are not allowed in upper-level setback except as follows:

1) A pitched roof, other than a shed roof or butterfly roof, is allowed in the upper-level setback if all parts of the roof are pitched at a rate of not less than 6:12 and not more than 12:12.

2) Open railings may extend up to 4 feet above the height at which the setback begins.

3) Parapets may extend up to 2 feet above the height at which the setback begins.

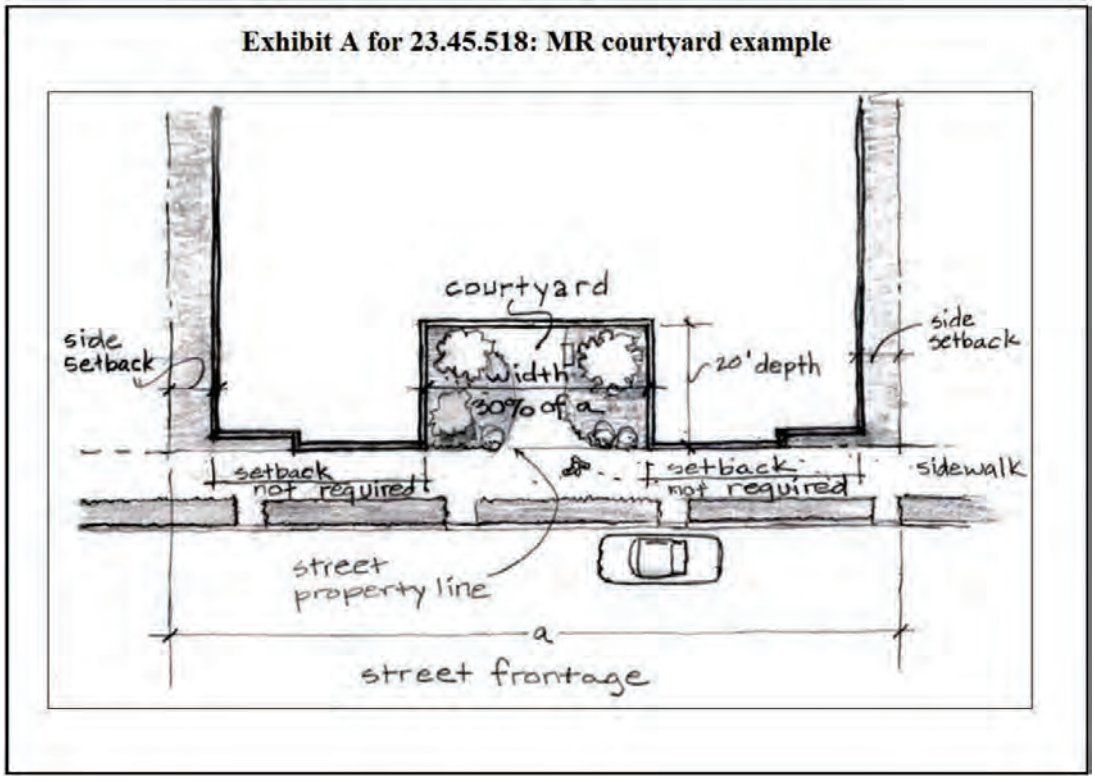
B. MR zones

1. Minimum setbacks for the MR zone are shown in Table B for 23.45.518 and subsection 23.45.518.B.2.

Table B for 23.45.518 MR setbacks measured in feet	
Setback location	**Required setback amount**
Front and side setback from street lot lines	7 average; 5 minimum No setback is required if a courtyard is provided that is at grade and abuts the street (see Exhibit A for 23.45.518), and the courtyard has: • a minimum width equal to 30 percent of the width of the abutting street frontage or 20 feet, whichever is greater; and • a minimum depth of 20 feet measured from the abutting street lot line.

Table B for 23.45.518 MR setbacks measured in feet	
Setback location	**Required setback amount**
Rear setback	15 from a rear lot line that does not abut an alley; or 10 from a rear lot line abutting an alley.
Side setback from interior lot line	For portions of a structure: • 42 feet or less in height: 7 average; 5 minimum • Above 42 feet in height: 10 average; 7 minimum

Exhibit A for 23.45.518
MR courtyard example



2. Upper-level setbacks in MR zones

a. For lots abutting a street that is less than 56 feet in width, all portions of the structure above 70 feet in height must be set back 15 feet from the front lot line abutting that street.

b. Projections allowed in subsection 23.45.518.H are allowed in upper-level setbacks.

c. Structures allowed in subsection 23.45.518.I are not allowed in upper-level setbacks.

d. Rooftop features are not allowed in upper-level setback except as follows:

1) Open railings may extend up to 4 feet above the height at which the setback begins.

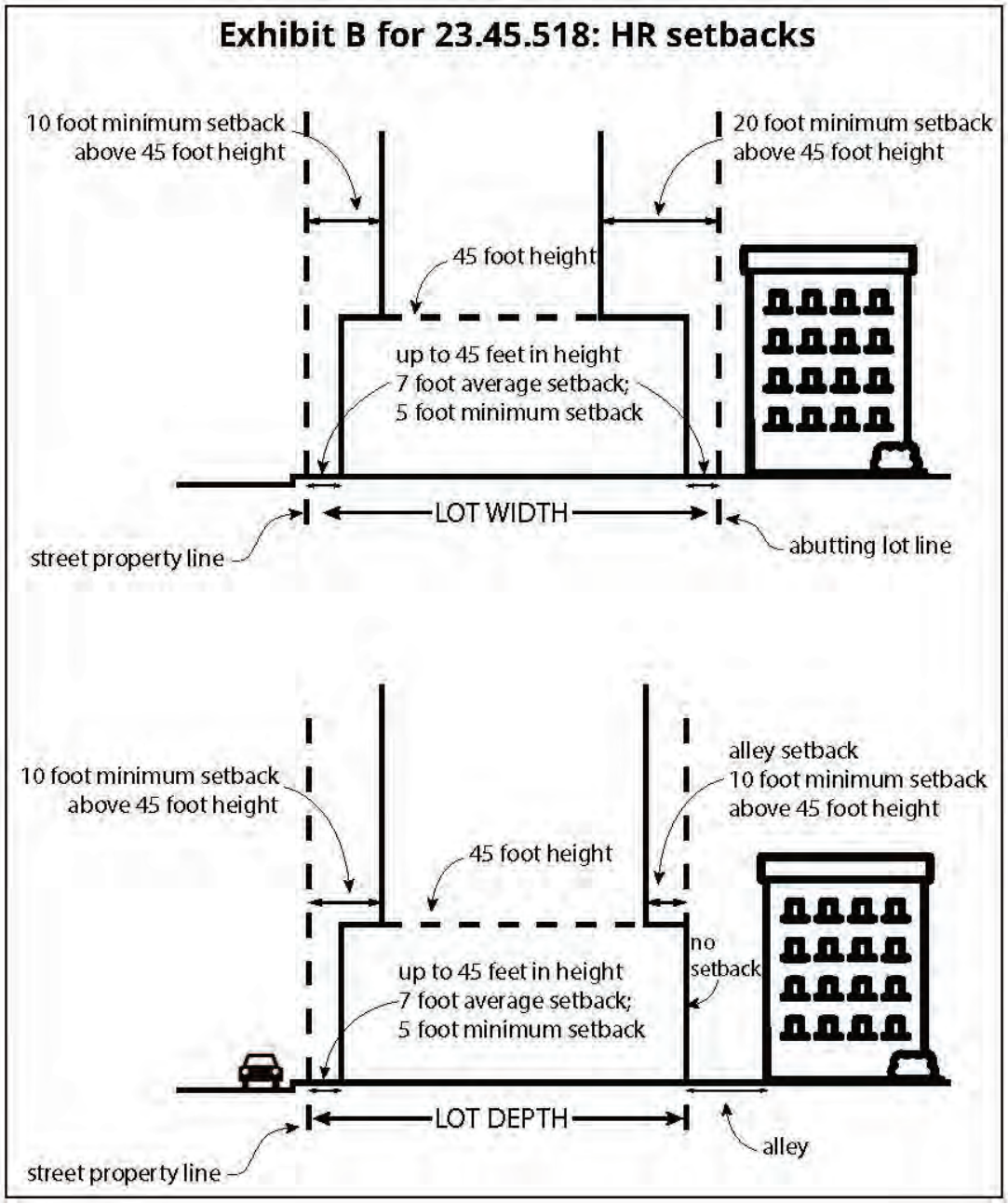
2) Parapets may extend up to 2 feet above the height at which the setback begins.

C. HR zones. Minimum setbacks for HR zones are shown in Table C for 23.45.518.

Table C for 23.45.518 HR setbacks measured in feet (see also Exhibit B for 23.45.518)	
Setbacks for structures 85 feet in height or less	
Structures 85 feet in height or less are subject to the setback provisions of the MR zone in subsection 23.45.518.B.	
Setbacks for structures greater than 85 feet in height	
Lot line abutting a street	For portions of a structure: • 45 feet or less in height: 7 average; 5 minimum, except that no setback is required for frontages occupied by street-level uses or dwelling units with a direct entry from the street; • Greater than 45 feet in height: 10 minimum

Table C for 23.45.518 HR setbacks measured in feet (see also Exhibit B for 23.45.518)	
Lot line abutting an alley	For portions of a structure: • 45 feet or less in height: no setback required; • Greater than 45 feet in height: 10 minimum
Lot line that abuts neither a street nor alley	For portions of a structure: • 45 feet or less in height: 7 average; 5 minimum, except that no setback is required for portions abutting an existing structure built to the abutting lot line; • Greater than 45 feet in height: 20 minimum

Exhibit B for 23.45.518
HR setbacks



D. Through lots. In the case of a through lot, each setback abutting a street ((~~except a side setback~~)) shall be a front setback. Rear setback requirements shall not apply to the through lot.

E. Other setback requirements. Additional structure setbacks may be required in order to meet the provisions of Chapter 23.53, Requirements for Streets, Alleys, and Easements.

F. ((~~Separations between multiple structures~~

~~1. In LR and MR zones, the minimum required separation between principal structures at any two points on different interior facades is 10 feet, except for cottage housing developments, and principal structures separated by a driveway or parking aisle.~~

~~2. In LR and MR zones, if principal structures are separated by a driveway or parking aisle, the minimum required separation between the principal structures is 2 feet greater than the required width of the driveway or parking aisle, provided that the separation is not required to be any greater than 24 feet. If principal structures are separated by a driveway or parking aisle, projections that enclose floor area may extend a maximum of 3 feet into the required separation if they are at least 8 feet above finished grade.~~

~~3. Cottage housing developments in LR and MR zones:~~

~~a. The minimum required separation between principal structures at any two points on different interior facades is 6 feet, unless there is a principal entrance on an interior facade, in which case the minimum separation required from that facade is 10 feet.~~

~~b. Facades of principal structures shall be separated from facades of accessory structures by a minimum of 3 feet.~~

~~G.~~)) Front and rear setbacks ((~~and all separations~~)) on lots containing certain environmentally critical areas or buffers may be reduced pursuant to Sections 25.09.280 and 25.09.300.

((~~H~~)) G. Projections permitted in required setbacks ((~~or separation~~))

1. ((~~Cornices~~)) Architectural features such as cornices, eaves, gutters, roofs, fireplaces, chimneys, and other ((~~forms of weather protection~~)) similar features may project into required setbacks ((~~and separations~~)) a maximum of 4 feet if they are no closer than 3 feet to any lot line.

2. Garden windows and other similar features that do not provide floor area may project a maximum of 18 inches into required setbacks ((~~and separations~~)) if they:

a. Are a minimum of 30 inches above the finished floor;

b. Are no more than 6 feet in height and 8 feet wide; and

c. Combined with bay windows and other similar features with floor area, make up no more than 30 percent of the area of the facade.

3. Bay windows and other similar features that provide floor area may project a maximum of 2 feet into required setbacks ((~~and separations~~)) if they:

a. Are no closer than 5 feet to any lot line;

b. Are no more than 10 feet in width; and

c. Combined with garden windows and other ((~~features~~)) projections included in subsection ((~~23.45.518.H.2~~)) 23.45.518.G.2, make up no more than 30 percent of the area of the facade.

4. Unenclosed decks up to 18 inches above existing or finished grade, whichever is lower, may project into required setbacks ((~~or separations~~)).

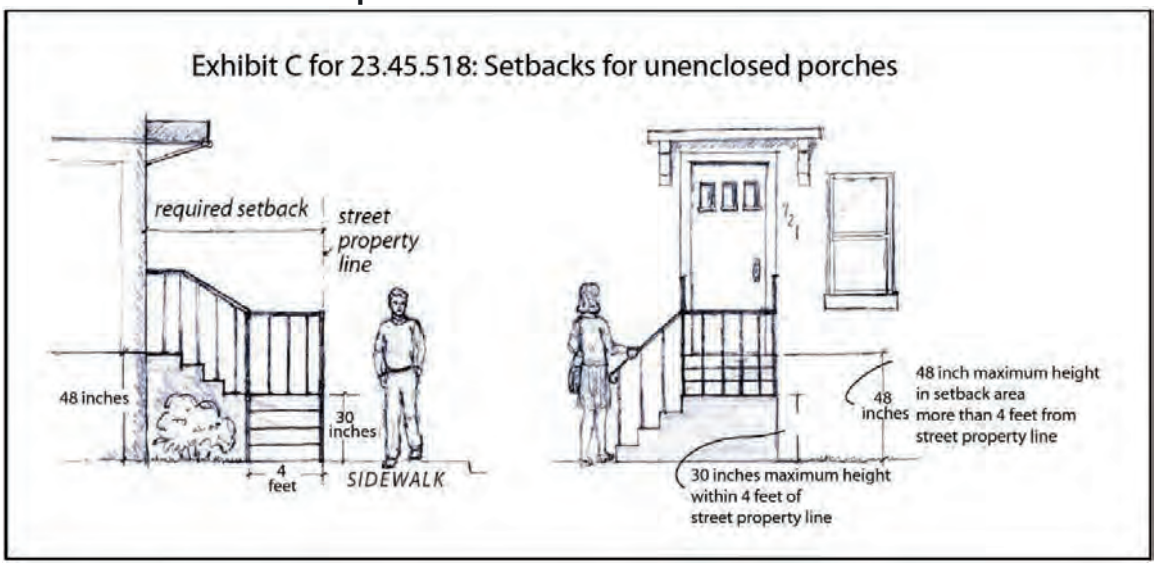
5. Unenclosed porches or steps

a. Unenclosed porches or steps no higher than 4 feet above existing grade, or the grade at the street lot line closest to the porch, whichever is lower, may extend to within 4 feet of a street lot line, except that portions of entry stairs or stoops not more than 2.5 feet in height from existing or finished grade, whichever is lower, ((~~excluding guard rails or hand rails,~~)) may extend to a street lot line. See Exhibit C for 23.45.518.

b. Unenclosed porches or steps no higher than 4 feet above existing grade may project into the required rear setback ((~~or required separation~~)) between structures a maximum of 4 feet provided they are a minimum of 5 feet from a rear lot line.

c. Unenclosed porches or steps permitted in required setbacks ((~~and separations~~)) shall be limited to a combined maximum width of 20 feet.

Exhibit C for 23.45.518
Setbacks for unenclosed porches



d. Permitted porches or steps may be covered, provided that no portions of the cover-structure, including any supports, are closer than 3 feet to any lot line.

6. Fireplaces and chimneys may project up to 18 inches into required setbacks ((~~or separations~~)).

7. Unenclosed decks and balconies may project a maximum of 4 feet into required setbacks if each one is:

a. No closer than 5 feet to any lot line;

b. No more than 20 feet wide; and

c. Separated from other decks and balconies on the same facade of the structure by a distance equal to at least 1/2 the width of the projection.

8. Mechanical equipment. Heat pumps and similar mechanical equipment, not including incinerators, are permitted in required setbacks if they comply with the requirements of Chapter 25.08. Any heat pump or similar equipment shall not be located within 3 feet of any lot line. Charging devices for electric cars are considered mechanical equipment and are permitted in required setbacks if not located within 3 feet of any lot line.

((~~I~~)) H. Structures in required setbacks ((~~or separations~~)), except upper-level setbacks

1. Detached garages, carports, or other accessory structures are allowed in ((~~required separations and~~)) required rear or side setbacks, subject to the following requirements:

a. Any accessory structure located between a principal structure and a side lot line shall provide the setback required for the principal structure;

b. Any portion of an accessory structure located more than 25 feet from a rear lot line shall be set back at least 5 feet from the side lot line;

c. Accessory structures shall be set back at least 7 feet from any lot line that abuts a street; and

d. Accessory structures shall be separated by at least 3 feet from all principal structures, including the eaves, gutters, and other projecting features of the principal structure.

2. Ramps or other devices necessary for access for the disabled and elderly that meet the Seattle Residential Code, Chapter 3, or Seattle Building Code, Chapter 11, Accessibility, are allowed in any required setback ((~~or separation~~)).

3. Uncovered, unenclosed pedestrian bridges, necessary for access and 5 feet or less in width, are allowed in any required setback ((~~or separation~~)).

4. Underground structures are allowed in any required setback ((~~or separation~~)).

5. Solar collectors are allowed in any required setback ((~~or separation~~)), pursuant to the provisions of Section 23.45.545.

6. Freestanding signs, bike racks, and similar unenclosed structures that are 6 feet or less in height above existing or finished grade, whichever is lower, are allowed in any required setback ((~~or separation~~)), provided that signs meet the provisions of Chapter 23.55, Signs.

7. Fences

a. Fences no greater than 6 feet in height are allowed in any required setback ((~~or separation~~)), except that fences in the required front setback extended to side lot lines or in street side setbacks extended to the front and rear lot lines may not exceed 4 feet in height. Fences located on top of a bulkhead or retaining wall are also limited to 4 feet. If a fence is placed on top of a new bulkhead or retaining wall used to raise grade, the maximum combined height is limited to 9.5 feet.

b. Up to 2 feet of additional height for architectural features such as arbors or trellises on the top of a fence is allowed((~~,~~)) if the architectural features are predominately open.

c. Fence height may be averaged along sloping grades for each 6-foot-long segment of the fence, but in no case may any portion of the fence exceed 8 feet in height when the height allowed by subsection ((~~23.45.518.I.7.a~~)) 23.45.518.H.7.a is 6 feet, or 6 feet in height when the height allowed by subsection ((~~23.45.518.I.7.a~~)) 23.45.518.H.7.a is 4 feet.

8. Bulkheads and retaining walls

a. Bulkheads and retaining walls used to raise grade are allowed in any required setback if they are limited to 6 feet in height, measured above existing grade. ((~~A guardrail no higher than 42 inches may be placed on top of a bulkhead or retaining wall existing as of January 3, 1997.~~))

b. Bulkheads and retaining walls used to protect a cut into existing grade may not exceed the minimum height necessary to support the cut or 6 feet measured from the finished grade on the low side, whichever is greater. ((~~If the bulkhead is measured from the low side and it exceeds 6 feet, an open guardrail of no more than 42 inches meeting Seattle Residential Code or Seattle Building Code requirements may be placed on top of the bulkhead or retaining wall.~~)) Any fence shall be set back a minimum of 3 feet from such a bulkhead or retaining wall.

((~~9. Arbors are allowed in any required setback or separation under the following conditions:~~

~~a. In each required setback or separation, an arbor may be erected with no more than a 40-square-foot footprint, measured on a horizontal roof plane inclusive of eaves, to a maximum height of 8 feet. At least 50 percent of both the sides and the roof of the arbor shall be open, or, if latticework is used, there shall be a minimum opening of 2 inches between crosspieces.~~

~~b. In each required setback abutting a street, an arbor over a private pedestrian walkway with no more than a 30-square-foot footprint, measured on the horizontal roof plane and inclusive of eaves, may be erected to a maximum height of 8 feet. At least 50 percent of the sides of the arbor shall be open, or, if latticework is used, there shall be a minimum opening of 2 inches between crosspieces.~~

~~10. Above-grade green stormwater infrastructure (GSI) features are allowed in any required setback or separation if:~~

~~a. Each above-grade GSI feature is no more than 4.5 feet tall, excluding piping;~~

~~b. Each above-grade GSI feature is no more than 4 feet wide; and~~

~~c. The total storage capacity of all above-grade GSI features is no greater than 600 gallons.~~

~~11. Above-grade GSI features larger than what is allowed in subsection 23.45.518.I.10 are allowed in any required setback or separation if:~~

~~a. Above-grade GSI features do not exceed ten percent coverage of any one setback or separation area;~~

~~b. No portion of an above-grade GSI feature is located closer than 2.5 feet from a side lot line; and~~

~~c. No portion of an above-grade GSI feature projects more than 5 feet into a front or rear setback area.~~))

9. Above-grade stormwater management features, such as bioretention planters and cisterns, are allowed in setbacks if:

a. No feature, excluding piping, is no more than:

1) 12 feet tall if located in a portion of the rear setback that is not also a side setback; or

2) 6.5 feet tall, if located in other setbacks

b. No feature greater than 4.5 feet tall is located within 10 feet of the front lot line, excluding piping, unless it is integrated into a bulkhead that is allowed in subsection 23.44.018.H.8;

c. No feature is located within 2.5 feet of the side lot line; and

d. The total storage capacity of all above-grade cisterns is no greater than 1,250 gallons.

((~~12~~)) 10. Mechanical equipment. Heat pumps and similar mechanical equipment, not including incinerators, are allowed in any required setback if they comply with the requirements of Chapter 25.08. No heat pump or similar equipment shall be located within 3 feet of any lot line. Charging devices for electric cars are considered

mechanical equipment and are allowed in any required setbacks if not located within 3 feet of any lot line.

((~~13~~)) 11. Detached, unenclosed structures accessory to ((~~townhouses~~)) attached or detached dwelling units that are up to 8 feet in height and used exclusively for bike parking are allowed in any required setback ((~~or separation~~)).

((~~14. Detached structures accessory to townhouses that are up to 10 feet in height and used exclusively for bike parking are allowed in required separations.~~))

12. Private, permanent swimming pools, hot tubs and other similar uses are permitted in any required setback, provided that:

a. No part of any swimming pools, hot tubs and other similar uses shall project more than 18 inches above existing grade in a required front setback; and

b. No swimming pool shall be placed closer than 5 feet to any front or side lot line.

13. Guardrails or handrails no more than 42 inches are allowed on unenclosed stairs, decks, access bridges, bulkheads, and retaining walls.

* * *

Section 25. A new Section 23.45.519 is added to the Seattle Municipal Code as follows:

23.45.519 Separations between structures

Note: This section would contain standards that are currently scattered throughout the existing Setbacks and Separations section. The new standards would be simpler than the existing standards and the base separation requirement would be reduced from 10 feet to 6 feet. This lower standard is being proposed as the 10-foot requirement was inadvertently pushing new housing to locate more open space between buildings rather than in front and rear of buildings where it might be more suitable for trees and gathering spaces.

A. In LR and MR zones, the minimum required separation between principal structures is 6 feet except that if the principal structures are separated by a driveway or parking aisle, the minimum required separation between the principal structures is 2 feet greater than the required width of the driveway or parking aisle, provided that the separation is not required to be any greater than 24 feet. If principal structures are separated by a driveway or parking aisle, projections that enclose floor area may extend

a maximum of 3 feet into the required separation if they are at least 8 feet above finished grade.

B. Architectural features such as cornices, eaves, gutters, roofs, fireplaces, chimneys, and other forms of weather protection may project into required separations a maximum of 2 feet. Unenclosed structures allowed in side setbacks are allowed in the minimum separation. Garden windows, bay windows, covered porches and patios, balconies, and enclosed structures are not allowed in the required separation. Detached structures that are up to 10 feet in height and used exclusively for bike parking are allowed in required separations.

Section 26. Section 23.45.522 of the Seattle Municipal Code, last amended by Ordinance 126157, is amended as follows:

23.45.522 Amenity area

Note: This section is proposed to be updated to implement the requirements of HB1110 that standards for middle housing can't be more restrictive than for detached homes and to make them more consistent with requirements for Neighborhood Residential zones.

A. Amount of amenity area ((~~required for rowhouse and townhouse developments and apartments in LR zones~~))

1. The required amount of amenity area ((~~for rowhouse and townhouse developments and apartments~~)) in LR zones is equal to ((~~25~~)) 20 percent of the lot area.

2. ((~~A minimum of 50 percent of the required amenity area shall be provided at ground level, except that amenity area provided on the roof of a structure that meets the provisions of subsection 23.45.510.D.5 may be counted as amenity area provided at ground level.~~

~~3. For rowhouse and townhouse developments, amenity area required at ground level may be provided as either private or common space.~~

~~4. For apartments, amenity area required at ground level shall be provided as common space.~~

~~B. Amenity area requirements for cottage housing developments in all multi-family zones~~

~~1. A minimum of 300 square feet of amenity area is required for each cottage.~~

~~2. A minimum of 150 square feet of amenity area is required for each carriage house.~~

~~3. The required quantity shall be allocated as follows:~~

~~a. Half of the amenity area required for each cottage, and all of the amenity area required for each carriage house, shall be provided as common amenity area; and~~

~~b. Half of the amenity area required for each cottage shall be provided as private amenity area for that unit.~~

~~4. The required common amenity area may be divided into no more than two separate areas and shall:~~

~~a. have cottages or carriage houses abutting on at least two sides;~~

~~b. be in a location central to the cottage housing development; and~~

~~c. have no horizontal dimension of less than 10 feet.~~

~~5. Carriage houses shall have stairs that provide access to the common amenity area.~~

~~C. Amount of amenity area required in MR and HR zones.~~)) The required amount of amenity area in MR and HR zones is equal to ((~~5~~)) five percent of the total gross floor area of a structure in residential use((~~, except that cottage housing developments shall meet the standards in subsection 23.45.522.B.~~

~~D. General requirements. Required amenity areas shall meet the following conditions:~~

~~1.~~)) B. All units shall have access to either a common or private amenity area. Common amenity areas provided for stacked dwelling units shall be accessible to all stacked dwelling units.

C. In Lowrise zones, a minimum of 50 percent of the required amenity area shall be provided at ground level or within 4 feet of existing grade.

((~~2~~)) D. Enclosed amenity areas

((~~a~~)) 1. In LR zones, an amenity area shall not be enclosed within a structure.

((~~b~~)) 2. In MR and HR zones, ((~~except for cottage housing~~)) no more than 50 percent of the amenity area may be enclosed, and this enclosed area shall be provided as common amenity area.

((~~3. Projections into amenity areas. Structural projections that do not provide floor area, such as garden windows, may extend up to 2 feet into an amenity area if they are at least 8 feet above finished grade.~~))

E. Size

((4)) 1. Private amenity areas. ((~~a. There is no minimum dimension for private amenity areas, except that if a private amenity area is located between the structure and a side lot line that is not a side street lot line, the minimum horizontal dimension shall be measured from the side lot line and is required to be a minimum of 10 feet.~~)) Each private amenity area shall be at least 60 square feet in area and have a minimum width and depth of 6 feet.

((~~b. An unenclosed porch that is a minimum of 60 square feet in size and that faces a street or a common amenity area may be counted as part of the private amenity area for the rowhouse, townhouse, or cottage to which it is attached.~~

~~5.~~)) 2. Common amenity areas. ((~~for rowhouse and townhouse developments and apartments shall meet the following conditions: a. No~~)) Each common amenity area shall be ((~~less than~~)) at least 250 square feet in area((~~, and common amenity areas shall~~)) and have a minimum ((~~horizontal dimension~~)) width and depth of 10 feet.

((~~b. Common amenity areas shall be improved as follows:~~

~~1) At least 50 percent of a common amenity area provided at ground level shall be landscaped with grass, ground cover, bushes, bioretention facilities, and/or trees.~~

~~2) Elements that enhance the usability and livability of the space for residents, such as seating, outdoor lighting, weather protection, art, or other similar features, shall be provided.~~

~~c. The common amenity area required at ground level for apartments shall be accessible to all apartment units.~~))

3. Projections that do not provide floor area may extend into an amenity area if they meet the standards for projections into setbacks in subsection 23.45.518.G

and if garden windows and other similar features are at least 8 feet above finished grade. Projections that provide floor area are not allowed in amenity areas.

4. Amenity areas may be covered by weather protection.

((~~6~~)) 5. ((~~Parking~~)) Vehicular parking areas, vehicular access easements, and driveways do not qualify as amenity areas((~~, except that a woonerf may provide a maximum of 50 percent of the amenity area if the design of the woonerf is approved through a design review process pursuant to Chapter 23.41~~)). Required bike parking and solid waste container storage space cannot be located in amenity areas. Enclosed structures cannot be located in amenity areas. Pathways serving multiple dwelling units cannot be located in private amenity areas.

((~~7~~)) 6. Swimming pools, spas, ((~~and~~)) hot tubs, and similar water features may be counted toward meeting the amenity area requirement.

7. Stormwater management features, such as bioretention planters and cisterns, are allowed in amenity areas.

((~~8~~)) 9. Rooftop areas ((~~excluded because they are near~~)) located within 8 feet of minor communication utilities and accessory communication devices((~~, pursuant to subsection 23.57.011.C.1,~~)) do not qualify as amenity areas: the area

F. Common amenity areas shall be improved as follows:

1. At least 50 percent of a common amenity area provided at ground level shall be landscaped with grass, ground cover, bushes, bioretention facilities, and/or trees.

2. Elements that enhance the usability and livability of the space for residents, such as seating, outdoor lighting, weather protection, art, or other similar features, shall be provided.

((~~E~~)) G. No amenity area is required for ((~~a~~)) one dwelling unit added to ((~~to a single-family dwelling unit~~)) with residential structure existing as of January 1, 1982((~~, or for one new dwelling unit added to a multifamily residential use existing as of October 10, 2001~~)), provided that no dwelling units have been added since that date.

Section 27. Section 23.45.527 of the Seattle Municipal Code, last amended by Ordinance 126509, is amended as follows:

23.45.527 Structure width ((~~and façade length limits~~)) in LR zones

This section is proposed to be updated to implement the requirements of HB1110 that standards for middle housing can't be more restrictive than for detached homes. The new approach would have a consistent set of structure width requirements for each zone. The facade length would be removed as it has been a major barrier to the development of stacked flats and new units on lots where homes are preserved as well as for development on lots with unusual site or topography issues.

((~~A.~~)) Structure width ((~~in LR zones~~)) may not exceed ((~~the width indicated on Table A for 23.45.527~~)) 90 feet in LR1 and LR2 zones and 150 feet in LR3 zones.

((~~Table A for 23.45.527: Maximum Structure Width in LR zones in feet~~

~~Zone~~	**~~Width in feet by Category of Residential Use~~**		
	~~Cottage Housing and Rowhouse Developments~~	**~~Townhouse Developments~~**	**~~Apartments~~**
~~LR1~~	~~No limit~~	~~60~~	~~45~~
~~LR2~~	~~No limit~~	~~90~~	~~90~~
~~LR3 outside Urban Villages, Urban Centers or Station Area Overlay Districts~~	~~No limit~~	~~120~~	~~120~~
~~LR3 inside Urban Villages, Urban Centers or Station Area Overlay Districts~~	~~No limit~~	~~150~~	~~150~~))

((~~B. Maximum façade length in Lowrise zones.~~

~~1. The maximum combined length of all portions of façades within 15 feet of a lot line that is neither a rear lot line nor a street or alley lot line shall not exceed 65 percent of the length of that lot line, except as specified in subsection 23.45.527.B.2.~~

~~2. For a rowhouse development on a lot that abuts the side lot line of a lot in a neighborhood residential zone, the maximum combined length of all portions of façades within 15 feet of the abutting side lot line is 40 feet.~~))

Section 28. Section 23.45.529 of the Seattle Municipal Code, last amended by Ordinance 127099, is amended as follows:

23.45.529 Design standards

Note: This section would be comprehensively updated in order to improve design outcomes and meet new state rules requiring clear and objective standards.

~~A. Intent. The intent of the design standards in this Section 23.45.529 is to:~~

~~1. Enhance street-facing and side facades to provide visual interest, promote new development that contributes to an attractive streetscape, and avoid the appearance of blank walls along a street or adjacent residential property;~~

~~2. Foster a sense of community by integrating new pedestrian-oriented multifamily development with the neighborhood street environment and promoting designs that allow easy surveillance of the street by area residents;~~

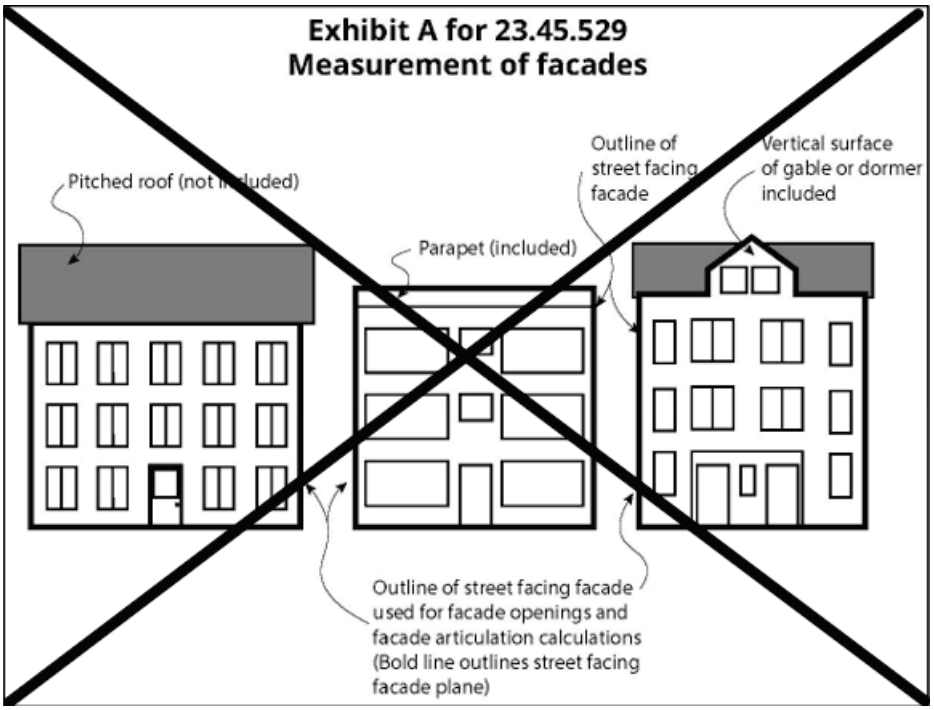
~~3. Promote livability in multifamily areas by providing a sense of openness and access to light and air; and~~

~~4. Encourage the compatibility of a variety of housing types with the scale and character of neighborhoods where new multifamily development occurs.~~

~~B. Application of provisions. The provisions of this Section 23.45.529 apply to all residential uses that do not undergo any type of design review pursuant to Chapter 23.41, except single-family dwelling units.~~

~~C. Treatment of street-facing facades. For the purposes of this subsection 23.45.529.C, a street-facing facade includes all vertical surfaces enclosing interior space, including gables and dormers, as shown in Exhibit A for 23.45.529.~~

~~**Exhibit A for 23.45.529**~~
~~**Measurement of facades**~~



~~1. Facade openings~~

~~a. At least 20 percent of the area of each street-facing facade shall consist of windows and/or doors, except as provided in subsection 23.45.529.C.1.b. If a front and side facade are street-facing, the two facades may be combined for the purpose of this calculation.~~

~~b. For any rowhouse or townhouse dwelling unit that has both a front and a side facade that are street-facing, the percentage of the side street-facing facade required to consist of windows and/or doors is reduced to ten percent for the portion of the facade associated with that dwelling unit. This reduction to ten percent is not allowed if the facades are combined for the purpose of this standard pursuant to subsection 23.45.529.C.1.a or if any of the exceptions in subsection 23.45.529.C.3 are applied.~~

~~c. Windows count toward the requirement for facade openings in this subsection 23.45.529.C.1 only if they are transparent. Windows composed of glass blocks or opaque glass, garage doors, and doors to utility and service areas do not count.~~

~~2. Facade articulation~~

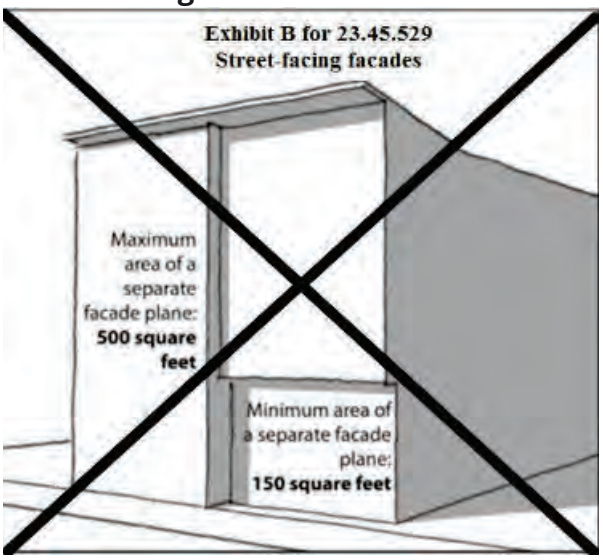
a. If a street-facing facade or portion of a street-facing facade is not vertical, the Director shall determine whether the facade is substantially vertical and required to comply with this subsection 23.45.529.C.

b. If the street-facing facade of a structure exceeds 750 square feet in area, division of the facade into separate facade planes is required (see Exhibit B for 23.45.529).

c. In order to be considered a separate facade plane for the purposes of this subsection 23.45.529.C.2, a portion of the street-facing facade shall have a minimum area of 150 square feet and a maximum area of 500 square feet, and shall project or be recessed from abutting facade planes by a minimum depth of 18 inches.

d. Trim that is a minimum of 0.75 inches deep and 3.5 inches wide is required to mark roof lines, porches, windows, and doors on all street-facing facades.

Exhibit B for 23.45.529
Street-facing facades



3. The Director may allow exceptions to the facade opening requirements in subsection 23.45.529.C.1 and the facade articulation requirements in subsection 23.45.529.C.2, if the Director determines that the street-facing facade will meet the intent of subsection 23.45.529.A.1 for all housing types, and, as applicable, the intent of subsections 23.45.529.E.2, 23.45.529.F.3, and 23.45.529.G.4 for cottage housing developments, rowhouse developments, and townhouse developments, respectively, through one or more of the following street-facing facade treatments:

a. Variations in building materials and/or color, or both, that reflect the stacking of stories or reinforce the articulation of the facade;

b. Incorporation of architectural features that add interest and dimension to the facade, such as porches, bay windows, chimneys, pilasters, columns, cornices, and/or balconies;

c. Special landscaping elements provided to meet Green Factor requirements pursuant to Section 23.45.524, such as trellises, that accommodate vegetated walls covering a minimum of 25 percent of the facade surface;

d. Special fenestration treatment, including an increase in the percentage of windows and doors to at least 25 percent of the street-facing facade(s).

D. Treatment of side facades that are not street-facing. For the purposes of this subsection 23.45.529.D, a side facade that is not street-facing includes all vertical surfaces enclosing interior space, including gables and dormers, as shown in Exhibit A for 23.45.529, if located within 10 feet of a side lot line.

1. If the side facade of a structure that is not street-facing exceeds 1,000 square feet in area, one of the following must be met:

a. A portion of the side facade with a minimum area of 250 square feet and a maximum area of 750 square feet shall project or be recessed from abutting facade planes by a minimum depth of 18 inches; or

b. The side facade shall include vertical or horizontal variations in building materials or color, covering a minimum of 25 percent of the facade surface.

2. Structures shall be designed to maintain the privacy of dwelling units by minimizing placement of proposed windows where they would directly align with windows on the side facade of a structure on an abutting lot located within 20 feet of the side property line or by use of fencing, screening, landscaping, or translucent windows to create privacy between buildings.

E. Design standards for cottage housing developments

1. Pedestrian entry. Each cottage with a street-facing facade that is located within 10 feet of the street lot line shall have a visually prominent pedestrian entry through the use of covered stoops, porches, or other architectural entry features. For cottages on corner lots that have more than one street-facing facade within 10 feet of the street lot line, a visually prominent pedestrian entry is required on only one of the street-facing facades. Access to these entrances may be through a required private amenity area that abuts the street.

2. Architectural expression. Cottage housing developments shall include architectural details that reduce the visual scale of the units. Each cottage shall employ one or more of the following design techniques to reduce visual scale of the units:

a. Attached covered porch;

b. Roofline features such as dormers or clerestories;

c. Bay windows;

d. Variation in siding texture and materials; and

e. Other appropriate architectural techniques demonstrated by the applicant to reduce the visual scale of cottages.

F. Design standards for rowhouse developments

1. Pedestrian entry. Each rowhouse unit shall have a pedestrian entry on the street-facing facade that is designed to be visually prominent through the use of covered stoops, porches, or other architectural entry features. For rowhouse units on corner lots, a visually prominent pedestrian entry is required on only one of the street-facing facades.

2. Front setback. Design elements to provide a transition between the street and the rowhouse units, such as landscaping, trees, fences, or other similar features, are required in the front setback.

3. Architectural expression. The street-facing facade of a rowhouse unit shall provide architectural detail or composition to visually identify each individual rowhouse unit as seen from the street. Design elements such as trim or molding, modulation, massing, color and material variation, or other similar features may be used to achieve visual identification of individual units. Rooftop features, such as dormers or clerestories, or roofline variation may be used to visually identify individual rowhouse units.

G. Design standards for townhouse developments

1. Building orientation. Townhouse developments shall maximize the orientation of individual units to the street by complying with one of the following conditions:

a. When multiple buildings are located on a lot, at least 50 percent of the townhouse units shall be located so that there is no intervening principal structure between the unit and the street, unless the intervening principal structure was

established under permit as of October 31, 2001, or was granted a permit on October 31, 2001, and the permit has not expired; or

b. All townhouse units without a street-facing facade shall have direct access to a common amenity area meeting the requirements of Section 23.45.522 that either abuts the street or is visible and accessible from the street by a clear pedestrian pathway.

2. Pedestrian pathway. A clear pedestrian pathway from the street to the entrance of each townhouse unit shall be provided. The pedestrian pathway may be part of a driveway, provided that the pathway is differentiated from the driveway by pavement color, texture, or similar technique. Signage identifying townhouse unit addresses and the directions to the unit entrance(s) from the street shall be provided.

3. Pedestrian entry. Each townhouse unit with a street-facing facade shall have a pedestrian entry on the street-facing facade that is designed to be a visually prominent feature through the use of covered stoops, porches, or other architectural entry features. For townhouse units on corner lots, a visually prominent pedestrian entry is required on only one of the street-facing facades.

4. Architectural expression. Architectural detail or composition shall be provided to visually identify each individual townhouse unit, as seen from the public street. Design elements such as trim or molding, modulation, massing, color and material variation, or other similar features may be used to achieve visual identification of individual units. Rooftop features, such as dormers or clerestories, or roofline variation may be used to visually identify individual townhouse units.

H. Building entry orientation standards for apartments

1. For each apartment structure, a principal shared pedestrian entrance is required that faces either a street or a common amenity area, such as a landscaped courtyard, that abuts and has direct access to the street. Additional pedestrian entrances to individual units are permitted.

2. If more than one apartment structure is located on a lot, each apartment structure separated from the street by another principal structure shall have a principal entrance that is accessible from a common amenity area with access to the street.

3. The shared entrance of each apartment structure shall have a pedestrian entry that is designed to be visually prominent, through the use of covered stoops, overhead weather protection, a recessed entry, or other architectural entry features.

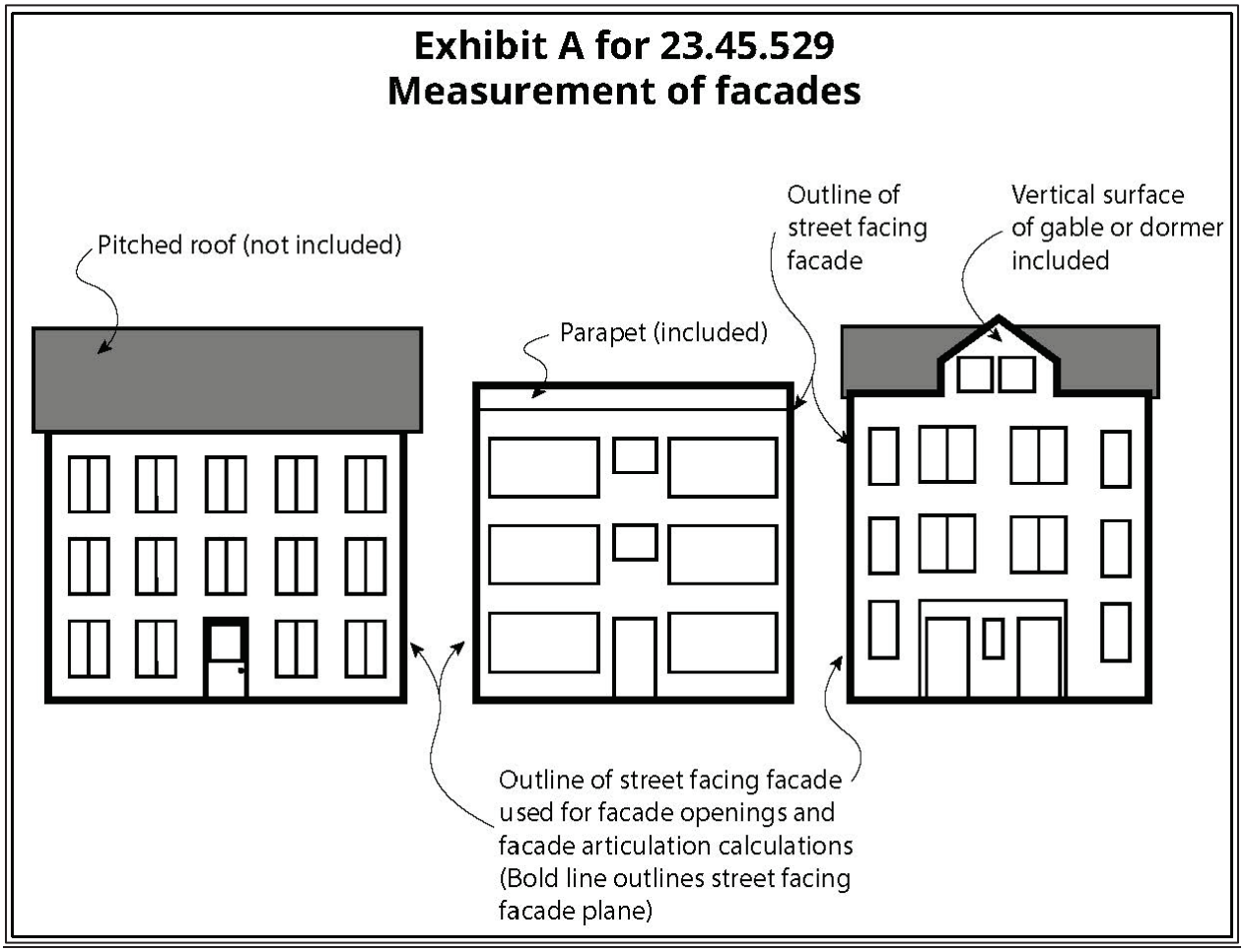
A. Application of provisions. The provisions of this Section 23.45.529 apply to all residential uses that do not undergo any type of design review pursuant to Chapter 23.41.

B. Definitions

1. For the purposes of this Section 23.45.529, a street-facing facade includes all vertical surfaces enclosing interior space, including gables and dormers, as shown in Exhibit A for 23.45.529.

Exhibit A for 23.45.529

Measurement of facades



2. For the purposes of this Section 23.45.529, requirements for street-facing facades shall only apply to structures located within 40 feet of a street lot line or a vehicle access easement serving ten or more residential units. For structures located within 40 feet of a vehicle access easement serving ten or more residential units but not within 40 feet of street lot line, the street-facing facade shall be the facade that faces the vehicle

access easement. If multiple facades face vehicle access easements, the applicant may decide which facade facing a vehicle access easement is considered the street-facing facade.

C. Access. Each unit shall have pedestrian access at least 3 feet in width to the sidewalk or, if no sidewalk exists, the front lot line. This access may be shared or private. This access may be over a driveway and may cross any required setbacks or interior separation. The pedestrian access may be part of a driveway.

D. Entrances. Each structure with a street-facing facade shall have a pedestrian entry on that street-facing facade meeting the following:

1. For stacked dwelling units, at least one pedestrian entry shall be required for the structure as a whole.

2. For attached and detached dwelling units, each individual dwelling with a street-facing facade within 40 feet of the street lot line shall have at least one pedestrian entry on the street-facing facade.

3. For structures or dwelling units on corner lots, a pedestrian entry is required on only one of the street-facing facades.

4. Required pedestrian entry on street-facing facades shall have weather protection, such as a covered porch, canopy, recessed entry or similar feature, measuring at least 3 feet by 3 feet in width and depth for attached and detached dwelling units and at least 6 feet in width and 4 feet in depth for stacked units.

5. For projects with multiple attached or detached dwelling units that are located on a corner lot, at least one pedestrian entry shall be located facing each street.

6. Exception. For attached and detached dwelling units, the pedestrian entry may be located on a wall perpendicular to the street-facing facade provided that the pedestrian entry abuts a covered porch or recessed entry that also abuts the street-facing facade.

E. Windows and doors. At least 20 percent of the area of each street-facing facade shall consist of windows and/or doors. If front and side facades are street-facing, the two facades shall be combined for the purpose of this calculation. Windows count toward the requirement for facade openings in this subsection 23.45.529.E only if they are transparent. Windows composed of garage doors and doors to utility and service areas do not count.

F. Materials. At least 60 percent of the area of each street-facing facade shall consist of materials that meet any combination of the following elements:

1. Windows and/or doors meeting the standards of subsection 23.45.529.E;

2. Bricks or other masonry materials that are no more than 12 inches in either height or width or brick or stone veneers that provide a similar appearance;

3. Wood slats no more than 16 inches in either height or width;

4. Overlapping boards, shingles, shakes, or similar elements that are no more than 16 inches in either height or width and a minimum of ½ inch in thickness; or

5. Contain indentations or projections with a minimum of ½ inch in depth and a minimum of ½ inch in width every 16 inches or less.

G. The Director may as a type 1 decision allow exceptions to the materials requirements in subsection 23.45.529.F if the Director determines that the design of the street-facing facade including materials, windows, and modulation will meet the intent of subsection 23.44.029.D to provide visual interest and prevent large, uninterrupted wall faces.

H. Projects must meet two of the following options:

1. Window treatment. At least 80 percent of windows on each street-facing facade are either:

a. Recessed by at least 2 inches behind the surface of the siding; or

b. Are surrounded by trim that is at least 3 inches wide.

2. Building projections

a. For attached and detached units, the street-facing facade of each dwelling unit located within 40 feet of a street lot line includes at least one projection of at least 2 feet in depth, 8 feet in width, and 18 feet in height.

b. For stacked units, street-facing facades must meet one of the following standards:

1) Have separate projections at least 2 feet in depth, 8 feet in width, and 8 feet in height spaced no more than 12 feet apart and no more than 12 feet from the edge of the building, measured vertically;

2) Have separate projections at least 2 feet in depth, 8 feet in width, and 18 feet in height spaced no more than 30 feet apart and no more than 30 feet from the edge of the building, measured vertically; or

3) Have separate projections or recessions at least 5 feet in depth, 8 feet in width, and 28 feet in height spaced no more than 40 feet apart and no more than 30 feet from the edge of the building, measured vertically.

c. All projections used to qualify for this standard must be at least 5 feet from other projections used to qualify for this standard.

d. As a Type 1 decision, the Director, may modify any of the standards of this subsection 23.45.529.H.2 where the street-facing facades of the buildings include

projections that are similar to the standards of this Section 23.45.529 and would meet the objective of providing visual interest in the building.

3. Balconies, porches, and canopies.

a. For stacked dwelling units, at least 50 percent of street-facing units shall have balconies, covered porches, or canopies.

b. For attached dwelling units, all street-facing units shall have a balcony, covered porch, or canopy on the street-facing facade.

c. Each balcony, porch, and canopy used to meet this requirement must be at least 30 square feet and must be accessible from the unit. If a canopy is provided to meet this requirement, the canopy may not be more than 15 feet above finished grade and at least 30 square feet of hardscaped surface must be provided at ground level underneath the canopy. Roof decks do not count toward meeting this requirement.

4. Windows meeting higher percentage. At least 35 percent of the area of each street-facing facade and at least 25 percent of each street-level, street-facing facade shall consist of windows and/or doors meeting the standards of 23.45.529.E. If a front and side facade are street-facing, the two facades shall be combined for the purpose of this calculation.

5. Materials meeting a higher standard. At least 75 percent of the area of each street-facing facade shall consist of materials that meet any combination of the following elements:

a. Windows and/or doors meeting the standards of subsection 23.45.529.E; or

b. Bricks or other masonry materials that are no more than 16 inches in either height or width or brick or stone veneers that provide a similar appearance.

Section 29. Section 23.45.531 of the Seattle Municipal Code, enacted by Ordinance 123495, is repealed:

((~~23.45.531 Development standards for cottage housing developments and carriage house structures~~

~~A. Size limit for dwelling units.~~

~~1. The maximum gross floor area of each cottage in a cottage housing development is 950 square feet.~~

~~2. The maximum gross floor area of a carriage house is 600 square feet.~~

~~B. Size limit for garages. The maximum gross floor area for a shared garage structure in a cottage housing development is 1,200 square feet, and the garage shall contain no more than four parking spaces.~~

~~C. Carriage house structures. A carriage house structure is permitted in a cottage housing development subject to the following standards:~~

~~1. The maximum number of dwelling units permitted in carriage house structures is one-third of the total number of units in the cottage housing development on the lot.~~

~~2. The maximum gross floor area of the ground floor of a carriage house structure is 1,200 square feet.~~

~~D. Existing single-family dwelling units in a cottage housing development. Existing single-family dwelling units that are non-conforming with respect to the standards for a cottage housing development are permitted to remain, provided that the extent of the nonconformity shall not be increased.~~))

Section 30. Section 23.45.545 of the Seattle Municipal Code, last amended by Ordinance 127099, is amended as follows:

23.45.545 Standards for ((~~certain accessory uses~~)) solar collectors

Note: Standards in this section have been moved to the uses and setbacks sections consistent with other zones. Provisions for solar greenhouses, greenhouses, and solariums have been removed as they is rarely used and there is not a clear public benefit to allowing these portions of buildings to intrude into setbacks.

A. ((~~Private, permanent swimming pools, hot tubs and other similar uses are permitted in any required setback, provided that:~~

~~1. No part of any swimming pools, hot tubs and other similar uses shall project more than 18 inches above existing grade in a required front setback; and~~

~~2. No swimming pool shall be placed closer than 5 feet to any front or side lot line.~~

~~B. Solar greenhouses, greenhouses and solariums~~

~~1. Solar greenhouses, greenhouses and solariums, in each case that are attached to and integrated with the principal structure and no more than 12 feet in height are permitted in a required rear setback, subject to subsection 23.45.545.B.3, and may extend a maximum of 6 feet into required front and side setbacks, subject to subsection 23.45.545.B.2.~~

~~2. An attached solar greenhouse, greenhouse or solarium, in a required setback, shall be no closer than 3 feet from side lot lines and 8 feet from front lot lines.~~

~~3. A solar greenhouse, greenhouse or solarium allowed pursuant to subsection 23.45.545.B.1 shall not be closer than 5 feet to the rear lot line, except that it may abut an alley if it is no taller than 10 feet along the rear lot line, is of no greater average height than 12 feet for a depth of 15 feet from the rear lot line, and is no wider than 50 percent of lot width for a depth of 15 feet from the rear lot line.~~

((~~C~~)) Solar collectors

1. Solar collectors are permitted in required setbacks, subject to the following:

a. Detached solar collectors are permitted in required rear setbacks, no closer than 5 feet to any other principal or accessory structure.

b. Detached solar collectors are permitted in required side setbacks, no closer than 5 feet to any other principal or accessory structure, and no closer than 3 feet to the side lot line.

2. Sunshades that provide shade for solar collectors that meet minimum written energy conservation standards administered by the Director may project into southern front or rear setbacks. Those that begin at 8 feet or more above finished grade may be no closer than 3 feet from the lot line. Sunshades that are between finished grade and 8 feet above finished grade may be no closer than 5 feet to the lot line.

3. Solar collectors on roofs. Solar collectors that are located on a roof are permitted as follows:

a. In LR zones up to 4 feet above the maximum height limit or 4 feet above the height of stair or elevator penthouse(s), whichever is higher; and

b. In MR and HR zones up to 10 feet above the maximum height limit or 10 feet above the height of stair or elevator penthouse(s), whichever is higher.

c. If the solar collectors would cause an existing structure to become nonconforming, or increase an existing nonconformity, the Director may permit the solar collectors as a special exception pursuant to Chapter 23.76. Solar collectors may be permitted under this subsection ((~~23.45.545.C.3.c~~)) 23.45.545.A.3.c even if the structure exceeds the height limits established in this subsection ((~~23.45.545.C.3~~)) 23.45.545.A, if the following conditions are met:

1) There is no feasible alternative solution to placing the collector(s) on the roof; and

2) The collector(s) are located so as to minimize view blockage from surrounding properties and the shading of property to the north, while still providing adequate solar access for the solar collectors.

((~~D. [Reserved.]~~

~~E~~)) B. Nonconforming solar collectors. The Director may permit the installation of solar collectors that meet minimum energy standards and that increase an existing nonconformity as a special exception pursuant to Chapter 23.76. Such an installation may be permitted even if it exceeds the height limits established in this Section 23.45.545 and Section 23.45.514 when the following conditions are met:

1. There is no feasible alternative solution to placing the collector(s) on the roof; and

2. Such collector(s) are located so as to minimize view blockage from surrounding properties and the shading of property to the north, while still providing adequate solar access for the solar collectors.

((~~F. Open wet moorage facilities for residential uses are permitted as an accessory use pursuant to Chapter 23.60A, Shoreline District, if only one slip per residential unit is provided.~~

~~G. Bed and breakfast uses. A bed and breakfast use may be operated under the following conditions:~~

~~1. The bed and breakfast use has a valid business license tax certificate issued by the Department of Finance and Administrative Services;~~

~~2. All operators of bed and breakfast uses who use a short-term rental platform for listing the bed and breakfast shall have a valid short-term rental operator's license issued by the Department of Finance and Administrative Services.~~

3. The bed and breakfast use shall be operated by the primary resident of the dwelling unit where the bed and breakfast is located or the resident operator;

4. There shall be no evidence of a bed and breakfast use visible from the exterior of the dwelling unit other than a sign permitted by subsection 23.55.022.D.1; and

5. A bed and breakfast use may be located in a dwelling unit or an accessory dwelling unit.

H. Heat recovery incinerators, located on the same lot as the principal use, may be permitted by the Director as accessory administrative conditional uses, pursuant to Section 23.45.506.

I. Accessory dwelling units are allowed in single-family, rowhouse and townhouse units, as follows:

1. One accessory dwelling unit is allowed for each single-family, rowhouse, or townhouse unit that is a "principal unit." A "principal unit" is a dwelling unit that is not an accessory dwelling unit.

2. The height limit for a detached accessory dwelling unit is 20 feet, except that the ridge of a pitched roof on a detached accessory dwelling unit may extend up to 3 feet above the 20-foot height limit. All parts of the roof above the height limit shall be pitched at a rate of not less than 4:12. No portion of a shed roof is permitted to extend beyond the 20-foot height limit.

3. The maximum gross floor area of an accessory dwelling unit is 650 square feet, provided that the total gross floor area of the accessory dwelling unit does not exceed 40 percent of the total gross floor area in residential use on the lot or unit lot, if present, exclusive of garages, storage sheds, and other non-habitable spaces.

4. An accessory dwelling unit shall be located completely within the same structure as the principal unit or in an accessory structure located between the single-family, rowhouse, or townhouse unit and the rear lot line.

5. The entrance to an accessory dwelling unit provided within the same structure as the principal unit shall be provided through one of the following configurations:

a. Through the primary entry to the principal unit; or

b. Through a secondary entry on a different facade than the primary entry to the principal unit; or

~~c. Through a secondary entry on the same facade as the primary entry to the principal unit that is smaller and less visually prominent than the entry to the principal unit, and does not have a prominent stoop, porch, portico or other entry feature.~~

~~6. Exterior stairs. Exterior stairs providing access to an accessory dwelling unit may not exceed 4 feet in height, except for exterior stairs providing access to an accessory dwelling unit located above a garage.~~

~~7. Parking. Parking is not required for an accessory dwelling unit.~~

~~8. In the Shoreline District, accessory dwelling units in single-family, rowhouse, and townhouse units shall be as provided in Chapter 23.60A, and where allowed in the Shoreline District, are also subject to the provisions in this subsection 23.45.545.I.~~

~~J. Urban farms are subject to the standards in Section 23.42.051 and the conditional use requirements in subsection 23.45.504.C.8.~~))

Section 31. Section 23.45.550 of the Seattle Municipal Code, last amended by Ordinance 126855, is amended as follows:

23.45.550 Alternative Standards for development of affordable units on property owned or controlled by a religious organization

Note: This section is being updated to reflect a new state requirement that allows additional density for lots with 2 or more affordable units.

((~~In lieu of meeting development standards contained in subsections 23.45.510.B and 23.45.510.C (floor area), subsections 23.45.512.A and 23.45.512.B (density), and subsections 23.45.514.A and 23.45.514.B (height), a proposed development that meets the requirements of Section 23.42.055 may elect to meet the alternative development standards in this Section 23.45.550.~~))

A. Development on a lot that meets the requirements of Section 23.42.055 may elect to meet the following development standards in lieu of the standards in subsections 23.45.510.C (floor area), subsections 23.45.512.A and 23.45.512.B (density), and subsections 23.45.514.A and 23.45.514.B (height):

((~~A~~)) 1. Floor area

((~~1~~)) a. Development permitted pursuant to Section 23.42.055 is subject to the FAR limits as shown in Table A for 23.45.550.

Table A for 23.45.550 FAR limits for development permitted pursuant to Section 23.42.055		
Zone	**Base FAR**	**Maximum additional exempt FAR [1]**
LR1	1.5	0.3
LR2	1.8	0.3
LR3 outside urban centers and urban villages	2.5	0.5
LR3 inside urban centers and urban villages	3.25	0.5
MR	5.0	0.5
HR	16	1.0
Footnote to Table A for 23.45.550 [1] Gross floor area for uses listed in subsection 23.45.550.B.2 are exempt from FAR calculations up to this amount.		

((~~2~~)) b. In addition to the FAR exemptions in subsection 23.45.510.D, an additional FAR exemption up to the total amount specified in Table A for 23.45.550 is allowed for any combination of the following floor area:

((~~a.~~)) 1) Floor area in units with two or more bedrooms and a minimum net unit area of 850 square feet;

((~~b.~~)) 2) Floor area of a religious facility; and

((~~c.~~)) 3) Floor area in a structure designated as a Landmark pursuant to Chapter 25.12; and

((~~d.~~)) 4) Any floor area in a development located within 1/4 mile (1,320 feet) of a transit stop or station served by a frequent transit route as defined in subsection 23.54.015.B.4.

((~~3~~)) c. Split-zoned lots

((~~a.~~)) 1) On lots located in two or more zones, the FAR limit for the entire lot shall be the highest FAR limit of all zones in which the lot is located, provided that:

((~~1~~)) a) At least 65 percent of the total lot area is in the zone with the highest FAR limit;

((~~2~~)) b) No portion of the lot is located in a ((~~neighborhood residential~~)) Neighborhood Residential zone; and

((~~3~~)) c) A minimum setback of 10 feet applies for any lot line that abuts a lot in a ((~~neighborhood residential~~)) Neighborhood Residential zone.

((~~b.~~)) 2) For the purposes of this subsection ((~~23.45.550.A.3~~)) 23.45.550.A.1.c, the calculation of the percentage of a lot or lots located in two or more zones may include lots that abut and are in the same ownership at the time of the permit application.

((~~B~~)) 2. Maximum height

((~~1~~)) a. Development permitted pursuant to Section 23.42.055 is subject to the height limits as shown in Table B for 23.45.550.

Table B for 23.45.550
Structure height for development permitted pursuant to Section 23.42.055

Zone	**Height limit (in feet)**
LR1	40
LR2	50
LR3 outside urban centers and urban villages	55

Table B for 23.45.550 **Structure height for development permitted pursuant to Section 23.42.055**	
Zone	**Height limit (in feet)**
LR3 inside urban centers and urban villages	65
MR	95
HR	480

((~~2~~)) b. Split-zoned lots

((~~a.~~)) 1) On lots located in two or more zones, the height limit for the entire lot shall be the highest height limit of all zones in which the lot is located, provided that:

((~~1~~)) a) At least 65 percent of the total lot area is in the zone with the highest height limit;

((~~2~~)) b) No portion of the lot is located in a ((~~neighborhood residential~~)) Neighborhood Residential zone; and

((~~3~~)) c) A minimum setback of 10 feet applies for any lot line that abuts a lot in a ((~~neighborhood residential~~)) Neighborhood Residential zone.

((~~b.~~)) 2) For the purposes of this subsection 23.45.550.B.2, the calculation of the percentage of a lot or lots located in two or more zones may include lots that abut and are in the same ownership at the time of the permit application.

((~~C~~)) 3. Density limits. Development permitted pursuant to this Section 23.45.550 is not subject to the standards of subsection((~~s 23.45.512.A and~~)) 23.45.512.B.

B. Proposed development on a lot that does not meet the requirements of Section 23.42.055 but meets the following criteria may elect to build up to six dwelling units in lieu of the standards in subsection 23.44.012.B (density):

1. The lot was created prior to June 6, 2024; and the lot has not been divided by subdivision or short subdivision or modified by unit lot subdivision since June 6, 2024; and

2. The lot has at least two dwelling units which are low-income housing units.

Changes to Other Sections

Section 32. Table A for Section 23.47A.004 of the Seattle Municipal Code, which section was last amended by Ordinance 127099, is amended as follows:

23.47A.004 Permitted and prohibited uses

Note: This section is proposed to be updated to reflect updates to the definition of residential and human service uses.

* * *

Table A for 23.47A.004 **Uses in Commercial zones**					
	Permitted and prohibited uses by zone [1]				
Uses	**NC1**	**NC2**	**NC3**	**C1**	**C2**
A. AGRICULTURAL USES					
A.1. Animal husbandry	A	A	A	A	P
A.2. Aquaculture	10	25	P	P	P
A.3. Community garden	P	P	P	P	P
A.4. Horticulture	10	25	P	P	P
A.5. Urban farm [2]	P	P	P	P	P
B. CEMETERIES	X	X	X	X	X
C. COMMERCIAL USES [3]					

Table A for 23.47A.004 Uses in Commercial zones					
	Permitted and prohibited uses by zone [1]				
Uses	**NC1**	**NC2**	**NC3**	**C1**	**C2**
C.1. Animal shelters and kennels	X	X	X	X	P
C.2. Eating and drinking establishments					
C.2.a. Drinking establishments	CU-10	CU-25	P	P	P
C.2.b. Restaurants	10	25	P	P	P
C.3. Entertainment uses					
C.3.a. Cabarets, adult [4]	X	P	P	P	P
C.3.b. Motion picture theaters, adult	X	X	X	X	X
C.3.c. Panorams, adult	X	X	X	X	X
C.3.d. Sports and recreation, indoor	10	25	P	P	P
C.3.e. Sports and recreation, outdoor	X	X	X [5]	P	P
C.3.f. Theaters and spectator sports facilities	X	25	P	P	P
C.4. Food processing and craft work [2]	10	25	25	P	P
C.5. Laboratories, research and development	10	25	P	P	P
C.6. Lodging uses	X [6]	CU-25 [6]	P	P	P
C.7. Medical services [7]	10 [8]	25	P	P	P
C.8. Offices	10	25	P	35 [9]	35 [9]
C.9. Sales and services, automotive					

Table A for 23.47A.004 Uses in Commercial zones					
	Permitted and prohibited uses by zone [1]				
Uses	**NC1**	**NC2**	**NC3**	**C1**	**C2**
C.9.a. Retail sales and services, automotive	10 [10]	25 [10]	P [10]	P	P
C.9.b. Sales and rental of motorized vehicles	X	25	P	P	P
C.9.c. Vehicle repair, major automotive	X	25	P	P	P
C.10. Sales and services, general [2]					
C.10.a. Retail sales and services, general [2]	10	25	P	P	P
C.10.b. Retail sales, multipurpose	10 [11]	50	P	P	P
C.11. Sales and services, heavy					
C.11.a. Commercial sales, heavy	X	X	25	P	P
C.11.b. Commercial services, heavy	X	X	X	P	P
C.11.c. Retail sales, major durables	10	25	P	P	P
C.11.d. Retail sales and services, non-household	10	25	P	P	P
C.11.e. Wholesale showrooms	X	X	25	25	P
C.12. Sales and services, marine					
C.12.a. Marine service stations	10	25	P	P	P
C.12.b. Sales and rental of large boats	X	25	P	P	P

Table A for 23.47A.004 Uses in Commercial zones					
	Permitted and prohibited uses by zone [1]				
Uses	**NC1**	**NC2**	**NC3**	**C1**	**C2**
C.12.c. Sales and rental of small boats, boat parts and accessories	10	25	P	P	P
C.12.d. Vessel repair, major	X	X	X	S	S
C.12.e. Vessel repair, minor	10	25	P	P	P
D. HIGH-IMPACT USES	X	X	X	X	X
E. HUMAN SERVICE AND ((~~INSTITUTIONS~~)) INSTITUTIONAL USES					
E.1. Human service and ((~~Institutions~~)) Institutional use not listed below	10	25	P	P	P
E.2. Major institutions subject to the provisions of Chapter 23.69	P	P	P	P	P
E.3. Religious facilities	P	P	P	P	P
E.4. Schools, elementary or secondary	P	P	P	P	P
E.5. Child care centers	P	P	P	P	P
F. LIVE-WORK UNITS [12]	P	P	P	P	P
G. MANUFACTURING USES					
G.1. Manufacturing, light [2]	X	10	25	P	P
G.2. Manufacturing, general	X	X	X	P	P
G.3. Manufacturing, heavy	X	X	X	X	X
H. PARKS AND OPEN SPACE	P	P	P	P	P

Table A for 23.47A.004 Uses in Commercial zones					
	Permitted and prohibited uses by zone [1]				
Uses	**NC1**	**NC2**	**NC3**	**C1**	**C2**
I. PUBLIC FACILITIES					
I.1. Jails					
I.1.a. Youth Service Centers	X	X	P [13]	X	X
I.1.b. All other jails	X	X	X	X	X
I.2. Work-release centers	CCU-10	CCU-25	CCU	CCU	CCU
J. RESIDENTIAL USES [14]	P	P	P	P	CU [15]
((~~J.1. Residential uses not listed below~~	~~P~~	~~P~~	~~P~~	~~P~~	~~CU [15]~~
~~J.2. Caretaker's quarters~~	~~P~~	~~P~~	~~P~~	~~P~~	~~P~~
~~J.3. Congregate residence~~	~~P~~	~~P~~	~~P~~	~~P~~	~~CU [15]~~
~~J.4. Low-income housing~~	~~P~~	~~P~~	~~P~~	~~P~~	~~P~~))
K. STORAGE USES					
K.1. Mini-warehouses	X	X	25	40	P
K.2. Storage, outdoor	X	X	X [16]	P	P
K.3. Warehouses	X	X	25	25	P
L. TRANSPORTATION FACILITIES					
L.1. Cargo terminals	X	X	X	S	P
L.2. Parking and moorage					

Table A for 23.47A.004 Uses in Commercial zones					
	Permitted and prohibited uses by zone [1]				
Uses	**NC1**	**NC2**	**NC3**	**C1**	**C2**
L.2.a. Boat moorage	S	S	S	S	S
L.2.b. Dry boat storage	X	25	P	P	P
L.2.c. Parking, flexible-use [17]	X	25	P	P	P
L.2.d.i. Park and ride facilities on surface parking lots [18]	X	CU-25	CU	CU	CU
L.2.d.ii. Park and ride facilities in parking garages	X	P [19]	P [19]	P [19]	P [19]
L.2.e. Towing services	X	X	X	P	P
L.3. Passenger terminals	X	X	25	P	P
L.4. Rail transit facilities	P	P	P	P	P
L.5. Transportation facilities, air					
L.5.a. Airports (land-based)	X	X	X	X	X
L.5.b. Airports (water-based)	X	X	X	X	S
L.5.c. Heliports	X	X	X	X	X
L.5.d. Helistops	X	X	CCU	CCU	CU
L.6. Vehicle storage and maintenance					
L.6.a. Bus bases	X	X	X	CCU	CCU
L.6.b. Railroad switchyards	X	X	X	X	X

Table A for 23.47A.004
Uses in Commercial zones

Uses	Permitted and prohibited uses by zone [1]				
	NC1	**NC2**	**NC3**	**C1**	**C2**
L.6.c. Railroad switchyards with a mechanized hump	X	X	X	X	X
L.6.d. Transportation services, personal	X	X	P	P	P
M. UTILITY USES					
M.1. Communication utilities, major [20]	X	X	X	CCU	CCU
M.2. Communication utilities, minor [20]	P	P	P	P	P
M.3. Power plants	X	X	X	X	X
M.4. Recycling	X	X	X	P	P/CU [21]
M.5. Sewage treatment plants	X	X	X	X	X
M.6. Solid waste management	X	X	X	X	X
M.7. Utility services uses	10	25	P	P	P

((~~KEY~~)) Key to Table A for 23.47A.004
A = Permitted as an accessory use only
CU = Administrative Conditional Use (business establishment limited to the multiple of 1,000 square feet of any number following a hyphen, pursuant to Section 23.47A.010)
CCU = Council Conditional Use (business establishment limited to the multiple of 1,000 square feet of any number following a hyphen, pursuant to Section 23.47A.010)
P = Permitted
S = Permitted in shoreline areas only
X = Prohibited
CU-25 = Conditionally permitted; use is limited to 25,000 square feet, pursuant to Section 23.47A.010
10 = Permitted, business establishments limited to 10,000 square feet, pursuant to Section 23.47A.010
20 = Permitted, business establishments limited to 20,000 square feet, pursuant to Section 23.47A.010

Table A for 23.47A.004
Uses in Commercial zones

	Permitted and prohibited uses by zone [1]				
Uses	**NC1**	**NC2**	**NC3**	**C1**	**C2**

25 = Permitted, business establishments limited to 25,000 square feet, pursuant to Section 23.47A.010
35 = Permitted, business establishments limited to 35,000 square feet, pursuant to Section 23.47A.010
40 = Permitted, business establishments limited to 40,000 square feet, pursuant to Section 23.47A.010
50 = Permitted, business establishments limited to 50,000 square feet, pursuant to Section 23.47A.010

Footnotes to Table A for 23.47A.004

[1] In pedestrian-designated zones, a portion of the street-level street-facing facade of a structure along a designated principal pedestrian street may be limited to certain uses as provided in subsection 23.47A.005.D. In pedestrian-designated zones, drive-in lanes are prohibited (Section 23.47A.028).

[2] In addition to the provisions in this Chapter 23.47A, uses that entail major cannabis activity are subject to the requirements of Section 23.42.058.

[3] For commercial uses with drive-in lanes, see Section 23.47A.028.

[4] Subject to subsection 23.47A.004.H.

[5] Permitted at Seattle Center.

[6] Bed and breakfasts in existing structures are permitted outright with no maximum size limit.

[7] Medical services over 10,000 square feet within 2,500 feet of a medical Major Institution Overlay boundary require conditional use approval, unless they are included in a Major Institution Master Plan or dedicated to veterinary services.

[8] Medical service uses that are located in an urban center or urban village, which are in operation at such location before August 1, 2015, and that routinely provide medical services on a reduced fee basis to individuals or families having incomes at or below 200 percent of the poverty guidelines updated periodically in the Federal Register by the U.S. Department of Health and Human Services under the authority of 42 USC 9902(2), are limited to 20,000 square feet. This provision does not apply to medical service uses that are subject to a Major Institution Master Plan.

[9] Office uses in C1 and C2 zones are permitted up to the greater of 1 FAR or 35,000 square feet as provided in subsection 23.47A.010.D. Office uses in C1 and C2 zones are permitted outright with no maximum size limit if they meet the standards identified in subsection 23.47A.010.D.

Table A for 23.47A.004 **Uses in Commercial zones**					
	Permitted and prohibited uses by zone [1]				
Uses	**NC1**	**NC2**	**NC3**	**C1**	**C2**

[10] Gas stations and other businesses with drive-in lanes are not permitted in pedestrian-designated zones (Section 23.47A.028). Elsewhere in NC zones, establishing a gas station may require a demonstration regarding impacts under Section 23.47A.028.

[11] Grocery stores meeting the conditions of subsection 23.47A.010.E are permitted up to 23,000 square feet in size.

[12] Subject to subsection 23.47A.004.G.

[13] Permitted pursuant to subsection 23.47A.004.D.7.

[14] Residential uses may be limited to 20 percent of a street-level street-facing facade pursuant to subsection 23.47A.005.C.

[15] Residential uses are conditional uses in C2 zones ((~~under~~)) subject to subsection 23.47A.006.A.3, except that low-income housing is allowed outright or as otherwise provided ((~~above in Table A for 23.47A.004 or~~)) in subsection 23.47A.006.A.3.

[16] Permitted at Seattle Center; see Section 23.47A.011.

[17] Flexible-use parking is subject to Section 23.54.026. In pedestrian-designated zones, surface parking is prohibited adjacent to principal pedestrian streets pursuant to subsection 23.47A.032.B.2.

[18] Permitted as surface parking only on surface parking lots existing as of January 1, 2017. In pedestrian-designated zones, surface parking is prohibited adjacent to principal pedestrian streets pursuant to subsection 23.47A.032.B.2.

[19] Permitted outright, except prohibited in the SAOD.

[20] See Chapter 23.57, Communications regulations, for regulation of communication utilities.

[21] A recycling use that is located on the same development site as a solid waste transfer station may be permitted by administrative conditional use, subject to the requirements of subsection 23.47A.006.A.7.

Section 33. Subsection 23.53.006.F of the Seattle Municipal Code, which section was last amended by Ordinance 127099, is amended as follows:

23.53.006 Pedestrian access and circulation

Note: This section is being amended to remove references to single-family dwelling units and to implement state requirements limited street improvements for accessory dwelling units.

* * *

F. Exceptions. The following exceptions to pedestrian access and circulation requirements and standards apply:

1. Projects exempt from requirements. Pedestrian access and circulation improvements are not required for the following types of projects:

a. Change of use;

b. Alterations to existing structures;

c. Additions to existing structures that are exempt from environmental review;

d. Construction of a detached structure that does not contain a dwelling unit and is accessory to ((~~a single-family~~)) an existing dwelling unit in any zone, if the property owner enters into a no-protest agreement, as authorized by chapter 35.43 RCW, to future pedestrian access and circulation improvements and that agreement is recorded with the King County Recorder;

e. Construction of ((~~a single-family~~)) one dwelling unit on a lot in any zone, if the property owner enters into a no-protest agreement, as authorized by chapter 35.43 RCW, to future pedestrian access and circulation improvements and that agreement is recorded with the King County Recorder, and if at least one of the following conditions is met:

1) The lot is on a block front where there are no existing pedestrian access and circulation improvements within 100 feet of the lot; or

2) Construction of pedestrian access and circulation improvements is not necessary because, for example, the existing right-of-way has suitable width and surface treatment for pedestrian use; or the existing right-of-way has a limited amount of existing and potential vehicular traffic; or the Director anticipates limited, if any, additional development near the lot because the development near the lot is at or near zoned capacity under current zoning designations;

f. Construction of accessory dwelling units;

((~~f~~)) g. Expansions of surface parking, outdoor storage, outdoor sales and outdoor display of rental equipment of less than 20 percent of the parking, storage, sales or display area, or number of parking spaces;

((~~g~~)) h. In ((~~MML zone~~)) IG1 and IG2 zones, and on lots in IB zones that are not directly across the street from or abutting a lot in a residential or commercial zone, the addition of:

1) Fewer than ten artist's studio dwellings;

2) Less than 750 square feet of gross floor area of major and minor vehicle repair uses and multipurpose retail sales; and

3) Less than 4,000 square feet of gross floor area of non-residential uses not listed in subsection ((~~23.53.006.F.1.g.2~~)) 23.53.006.F.1.h.2; and

((~~h~~)) i. Construction of a new (~~non-residential~~)) nonresidential structure of up to 4,000 square feet of gross floor area if the structure is at least 50 feet from any lot line abutting an existing street that does not have pedestrian access and circulation improvements.

2. Waiver or modification of pedestrian access and circulation requirements. The Director, in consultation with the Director of Transportation, may waive or modify pedestrian access and circulation requirements when one or more of the following conditions are met. The waiver or modification shall provide the minimum relief necessary to accommodate site conditions while maximizing pedestrian access and circulation.

a. Location in an environmentally critical area or buffer makes installation of a sidewalk, curb, and/or curb ramp structurally impracticable or technically infeasible;

b. The existence of a bridge, viaduct, or structure such as a substantial retaining wall in proximity to the project site makes installation of a sidewalk, curb, and/or curb ramp structurally impracticable or technically infeasible;

c. Sidewalk, curb, and/or curb ramp construction would result in undesirable disruption of existing drainage patterns, or disturbance to or removal of natural features such as significant trees or other valuable and character-defining mature vegetation; or

d. Sidewalk, curb, and/or curb ramp construction would preclude vehicular access to the lot, for example on project sites where topography would render driveway access in excess of the maximum 15 percent slope.

3. Notwithstanding any provision of Section 23.76.026, the applicant for a Master Use Permit or a building permit to which the Land Use Code in effect prior to October 30, 2009 applies may, by written election, use the exemptions in subsections 23.53.006.F.1 and 23.53.006.F.2.

Section 34. Section 23.53.025 of the Seattle Municipal Code, last amended by Ordinance 126682, is amended as follows:

23.53.025 Access easement standards

Note: This section is being edited to meet new state requirement implemented by HB 1110 to treat detached units similarly to attached units.

If access by easement has been approved by the Director, the easement shall meet the following standards. Surfacing of easements, pedestrian walkways required within easements, and turnaround dimensions shall meet the requirements of the Right-of-Way Improvements Manual.

A. Vehicle access easements serving one or two ((~~single-family~~)) dwelling units ((~~or one multifamily residential use with a maximum of two units~~)) shall meet the following standards:

1. Easement width shall be a minimum of 10 feet.

2. No maximum easement length shall be set. If easement length is more than 150 feet, a vehicle turnaround shall be provided.

3. ((~~Curbcut~~)) Curb cut width from the easement to the street shall be the minimum necessary for safety and access.

B. Vehicle access easements serving at least three but fewer than ((~~five single-family~~)) ten dwelling units shall meet the following standards:

1. Easement width shall be a minimum of 10 feet.

2. The easement shall provide a hard-surfaced roadway at least 10 feet wide.

3. No maximum easement length shall be set. If the easement is over 600 feet long, a fire hydrant may be required by the Director.

4. A turnaround shall be provided unless the easement extends from street to street.

5. ((~~Curbcut~~)) Curb cut width from the easement to the street shall be the minimum necessary for safety and access.

C. ((~~Vehicle access easements serving at least five but fewer than ten single-family dwelling units, or at least three but fewer than ten multifamily dwelling units~~

~~1. Easement width, surfaced width, length, turn around, and curbcut width shall be as required in subsection 23.53.025.B.~~

~~2. No single-family structure shall be closer than 5 feet to the easement, except that structural features allowed to extend into required yards under subsection 23.44.014.C.6 are also allowed to extend into the 5-foot setback from an easement.~~

~~D.~~)) Vehicle ((~~Access Easements Serving Ten~~)) access easements serving ten or more ((~~Residential~~)) dwelling ((~~Units.~~)) units shall meet the following standards:

1. Easement width shall be a minimum of 32 feet;

2. The easement shall provide a surfaced roadway at least 24 feet wide, except in the MPC-YT zone, where the minimum surfaced roadway width is 20 feet;

3. No maximum length shall be set. If the easement is over 600 feet long, a fire hydrant may be required by the Director;

4. A turnaround shall be provided unless the easement extends from street to street;

5. ((~~Curbcut~~)) Curb cut width from the easement to the street shall be the minimum necessary for safety access;

6. No ((~~single-family structure~~)) detached dwelling unit shall be located closer than ((~~10~~)) 5 feet to an easement, except that architectural features such as cornices, eaves, gutters, roofs, fireplaces, chimneys, and other similar features shall not be located closer than 3 feet to a required easement;

7. One pedestrian walkway shall be provided, extending the length of the easement.

E. ((~~Vehicle Access Easements Serving Nonresidential or Live-work Uses.~~

~~1.~~)) For nonresidential or live-work uses providing fewer than ten ((~~(10)~~)) parking spaces, the easement shall meet the requirements of subsection ((~~C~~)) 23.53.025.C.

((~~2~~)) F. For nonresidential or live-work uses providing ten ((~~(10)~~)) or more parking spaces, the easement shall meet the requirements of subsection ((~~D~~)) 23.53.025.D.

((~~F~~)) G. Pedestrian ((~~Access Easements~~)) access easements. Where a lot proposed for a residential use abuts an alley but does not abut a street and the provisions of the zone require access by vehicles from the alley, or where the alley access is an exercised option, an easement providing pedestrian access to a street from the lot shall be provided meeting the following standards:

1. Easement width shall be a minimum of five ((~~(5)~~)) feet;

2. Easements serving one ((~~(1)~~)) or two ((~~(2)~~)) dwelling units shall provide a paved pedestrian walkway at least ((~~three (~~))3((~~)~~)) feet wide;

3. Easements serving three ((~~(3)~~)) or more dwelling units shall provide a paved pedestrian walkway at least ((~~five (~~))5((~~)~~)) feet wide;

4. Easements over ((~~one hundred (~~))100((~~)~~)) feet in length shall provide lighting at intervals not to exceed ((~~fifty (~~))50((~~)~~)) feet. Lighting placement shall not exceed ((~~fifteen (~~))15((~~)~~)) feet in height;

5. Pedestrian access easements shall not exceed ((~~two hundred (~~))200((~~)~~)) feet in length.

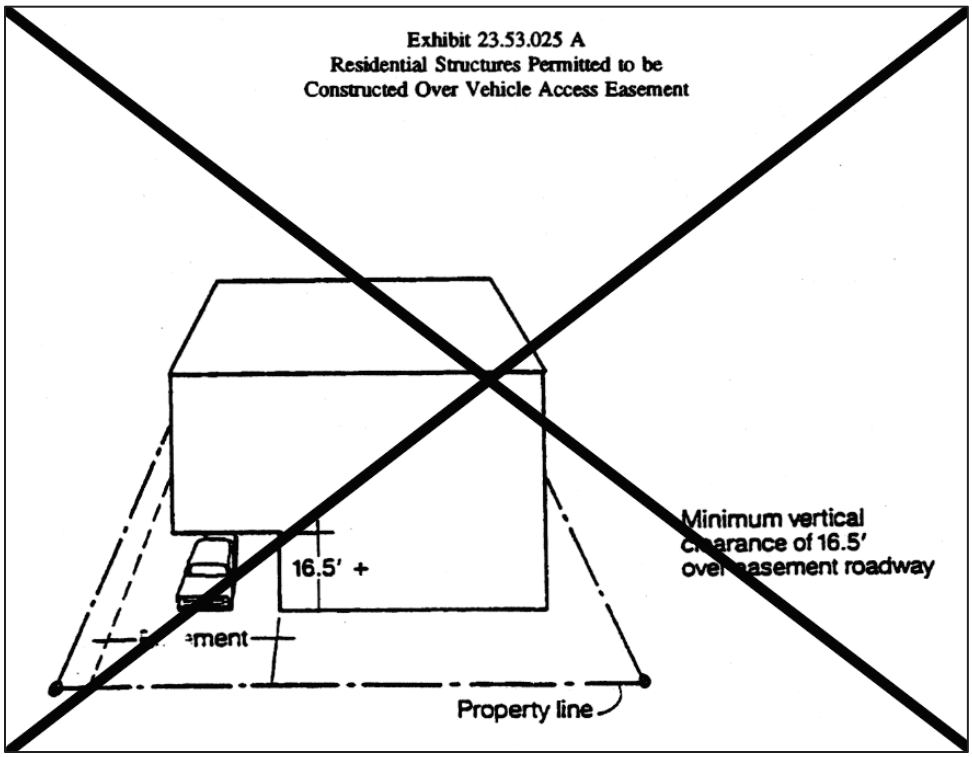
((~~G~~)) H. Vertical ((~~Clearance Above Easements~~)) clearance above easements. When an easement serves fewer than ten ((~~(10)~~)) residential units and crosses a residentially zoned lot, portions of structures may be built over the easement provided that a minimum vertical clearance of ((~~sixteen and one-half (16 ½)~~)) 16.5 feet is maintained above the surface of the easement roadway and a minimum turning path radius in accordance with Section 23.54.030.D ((~~C~~)) is maintained. (((~~See~~)) Exhibit A for 23.53.025 ((~~A~~)).)

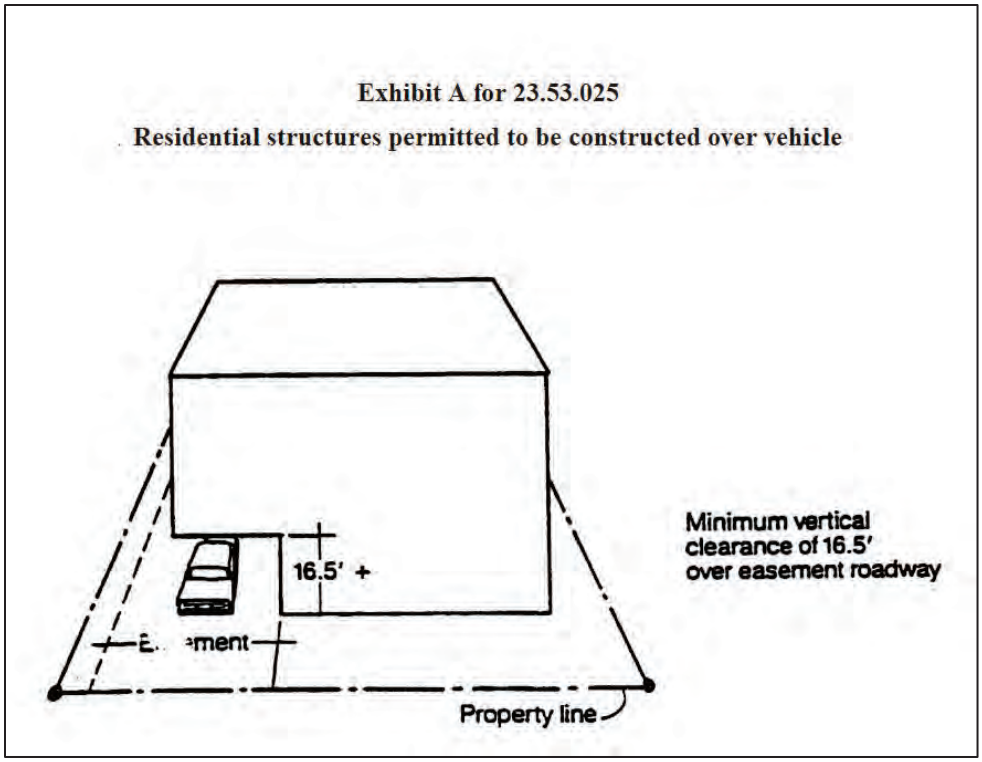
((~~H~~)) I. Exceptions ((~~From Access Easement Standards~~)) from access easement standards. The Director, in consultation with the Fire Chief, may modify the requirements for easement width and surfacing for properties located in environmentally critical areas or their buffers when it is determined that:

1. Such modification(s) would reduce adverse effects to identified environmentally critical areas or buffers; and

2. Adequate access and provisions for fire protection can be provided for structures served by the easement.

Exhibit A for 23.53.025
Residential structures permitted to be constructed over vehicle access easement





Section 35. Section 23.54.015 of the Seattle Municipal Code, which was last amended by Ordinance 127099, is amended as follows:

23.54.015 Required vehicular parking and maximum vehicular parking limits

Note: This section is being updated to implement exempt areas near light rail and bus rapid transit stops from parking requirements, reduce the parking requirements for residential use in other areas, and reflect updated definitions for residential uses. Some of these changes are required under HB 1110 but other changes being proposed to provide flexibility to accommodate different housing types.

A. Required parking. The minimum number of off-street motor vehicle parking spaces required for specific uses is set forth in Table A for 23.54.015 for (~~non-residential~~)) nonresidential uses other than institutional uses, Table B for 23.54.015 for residential uses, and Table C for 23.54.015 for institutional uses, except as otherwise provided in this Chapter 23.54. Required parking is based upon gross floor area of a use within a structure minus gross floor area in parking uses, and the square footage of a use when located outside of an enclosed structure, or as otherwise specified. Maximum parking limits for specific uses and specific areas are set forth in subsection 23.54.015.C. Exceptions to motor vehicle parking requirements set forth in this Section 23.54.015 are provided in: subsections 23.54.015.B and 23.54.015.C; and in Section 23.54.020 unless otherwise specified. This Chapter 23.54 does not apply to parking for construction activity, which is regulated by Section 23.42.044.

B. Required parking for specific zones and areas

1. Parking in downtown zones is regulated by Chapters 23.49 and 23.66, and not by this Section 23.54.015.

2. Parking in the MPC-YT zone is regulated by Section 23.75.180 and not by this Section 23.54.015.

3. Parking for major institution uses in the Major Institution Overlay District is regulated by Sections 23.54.015 and 23.54.016.

4. The Director shall adopt by rule a map of frequent transit service areas based on proximity to a transit station or stop served by a frequent transit route. The determination whether a proposed development site is in a scheduled frequent transit service area shall be based on the frequent transit service area map adopted by rule that exists on the date a project vests according to the standards of Section 23.76.026, provided that a rule that takes effect on a date after the project vests may be applied to determine whether the site is in a scheduled frequent transit service area, at the election of the project applicant in accordance with subsection 23.76.026.E.

C. Maximum parking limits for specific zones or areas

1. In the Stadium Transition Area Overlay District certain uses are subject to a maximum parking ratio pursuant to subsection 23.74.010.A.1.b. When there are multiple uses on a lot, the total parking requirement for all uses subject to a maximum ratio cannot exceed the aggregate maximum for those uses under Section 23.74.010.

2. In all commercial zones, except C2 zones outside of urban villages, no more than 145 spaces per lot may be provided as surface parking or as flexible-use parking.

3. In all multifamily zones, commercial uses are limited to no more than ten parking spaces per business establishment.

4. In the Northgate Overlay District, the Director may permit parking to exceed applicable maximum parking limits as a Type I decision pursuant to Chapter 23.76 if:

a. The parking is provided in a structure according to a joint-use parking agreement with King County Metro Transit; and

b. It can be demonstrated to the satisfaction of the Director through a parking demand study that the spaces are only needed to meet evening and weekend demand or as overflow on less than ten percent of the weekdays in a year, and the spaces shall otherwise be available for daytime use by the general public.

5. Notwithstanding the minimum parking requirements set out in Table A for 23.54.015, in the Industry and Innovation zones, the maximum parking ratio for all uses is one space per 1,000 square feet of gross floor area.

D. Parking waivers for (~~non-residential~~)) nonresidential uses

1. In all commercial zones, no parking is required for the first 1,500 square feet of each business establishment or the first 15 fixed seats for motion picture and performing arts theaters.

2. In all other zones, no parking is required for the first 2,500 square feet of gross floor area of (~~non-residential~~)) nonresidential uses in a structure, except for the following:

a. Structures or portions of structures occupied by restaurants with drive-in lanes,

b. Motion picture theaters,

c. Offices, or

d. Institution uses, including Major Institution uses. When two or more uses with different parking ratios occupy a structure, the 2,500 square foot waiver is prorated based on the area occupied by the ((~~non-residential~~)) nonresidential uses for which the parking waiver is permitted.

E. Fleet vehicles. Notwithstanding any other provisions of this ((~~section~~)) Section 23.54.015, off-street parking shall be provided for all fleet vehicles and those parking spaces will not be counted toward the parking requirements of Table A for 23.54.015, Table B for 23.54.015, or Table C for 23.54.015.

F. Use and reuse of schools. For non-school uses permitted to locate in a former or existing public school, parking requirements will be determined by school use pursuant to criteria adopted according to Chapter 23.78, Establishment of Criteria for Joint Use or Reuse of Schools.

G. New (~~non-residential~~)) nonresidential uses in existing structures in commercial and industrial zones. Up to 20 required parking spaces are waived for a new (~~non-residential~~)) nonresidential use established in an existing structure or the expansion of an existing (~~non-residential~~)) nonresidential use entirely within an existing structure. Existing required parking shall remain. For purposes of this Section 23.54.015, "existing structure" means a structure that was established under permit, or for which a building permit has been granted and has not expired, at least two years prior to the application to establish the new use or expand the use. Parking spaces required for loading and unloading of passengers are not eligible for the waiver under this subsection 23.54.015.G.

H. Uses not shown on parking tables. In the case of a use not shown on Table A for 23.54.015, Table B for 23.54.015, or Table C for 23.54.015, the requirements for off-street parking will be determined by the Director based on the requirements for the most comparable use. Where, in the judgment of the Director, none of the uses on Table A for 23.54.015, Table B for 23.54.015, and Table C for 23.54.015 are comparable to a proposed use, the Director may base his or her determination as to the amount of parking required for the proposed use on detailed information provided by the applicant. The information required may include, but not be limited to, a description of the physical structure(s), identification of potential users, and analysis of likely parking demand.

I. Uses in multiple parking table categories. If an entire use or structure, or the same portion of a use or structure, falls under more than one category in Table A for 23.54.015, Table B for 23.54.015, or Table C for 23.54.015 then, unless otherwise specified, the category requiring the smallest number of parking spaces applies except as expressly set forth on such tables.

J. Existing parking deficits. Existing legal parking deficits of legally established uses are allowed to continue even if a change of use occurs. This subsection 23.54.015.J will not be construed to permit a parking deficit caused by the failure to satisfy conditions of a reduced parking requirement for any use or structure.

Table A for 23.54.015
Required parking for ((~~non-residential~~)) nonresidential uses other than institutions

Use			**Minimum parking required**
I. General ((~~non-residential~~)) nonresidential uses (other than institutions)			
A.	AGRICULTURAL USES [1]		1 space for each 2,000 square feet
B.	COMMERCIAL USES		
	B.1.	Animal shelters and kennels	1 space for each 2,000 square feet
	B.2.	Eating and drinking establishments	1 space for each 250 square feet
	B.3.	Entertainment uses, general, except as noted below [2]	For public assembly areas: 1 space for each 8 fixed seats, or 1 space for each 100

Table A for 23.54.015
Required parking for ((~~non-residential~~)) nonresidential uses other than institutions

Use				Minimum parking required
				square feet of public assembly area not containing fixed seats
		B.3.a.	Adult cabarets	1 space for each 250 square feet
		B.3.b.	Sports and recreation uses [3]	1 space for each 500 square feet
	B.4.	Food processing and craft work		1 space for each 2,000 square feet
	B.5.	Laboratories, research and development		1 space for each 1,500 square feet
	B.6.	Lodging uses		1 space for each 4 rooms; For bed and breakfast facilities in neighborhood residential and multifamily zones, 1 space for each dwelling unit, plus 1 space for each 2 guest rooms
	B.7.	Medical services		1 space for each 500 square feet
	B.8.	Offices		1 space for each 1,000 square feet
	B.9.	Sales and services, automotive		1 space for each 2,000 square feet
	B.10.	Sales and services, general, except as noted below		1 space for each 500 square feet
		B.10.a.	Pet daycare centers [4]	1 space for each 10 animals or 1 space for each staff member, whichever is greater, plus 1 loading and unloading space for each 20 animals
	B.11.	Sales and services, heavy		1 space for each 2,000 square feet

Table A for 23.54.015 **Required parking for ((~~non-residential~~)) nonresidential uses other than institutions**				
Use				**Minimum parking required**
	B.12.	Sales and services, marine		1 space for each 2,000 square feet
C.	HIGH IMPACT USES			1 space for each 2,000 square feet
D.	LIVE-WORK UNITS			0 spaces for units with 1,500 square feet or less; 1 space for each unit greater than 1,500 square feet; 1 space for each unit greater than 2,500 square feet, plus the parking that would be required for any nonresidential activity classified as a principal use
E.	MANUFACTURING USES			1 space for each 2,000 square feet
F.	STORAGE USES			1 space for each 2,000 square feet
G.	TRANSPORTATION FACILITIES			
	G.1.	Cargo terminals		1 space for each 2,000 square feet
	G.2.	Parking and moorage		
		G.2.a.	Flexible-use parking	None
		G.2.b.	Towing services	None
		G.2.c.	Boat moorage	1 space for each 2 berths
		G.2.d.	Dry storage of boats	1 space for each 2,000 square feet
	G.3.	Passenger terminals		1 space for each 100 square feet of waiting area
	G.4.	Rail transit facilities		None

Table A for 23.54.015 Required parking for ((~~non-residential~~)) nonresidential uses other than institutions			
Use			**Minimum parking required**
	G.5.	Transportation facilities, air	1 space for each 100 square feet of waiting area
	G.6.	Vehicle storage and maintenance uses	1 space for each 2,000 square feet
H.	UTILITIES		1 space for each 2,000 square feet
II. ((~~Non-residential~~)) Nonresidential use requirements for specific areas			
I.	((~~Non-residential~~)) Nonresidential uses in urban centers or the Station Area Overlay District [5]		No minimum requirement
J.	((~~Non-residential~~)) Nonresidential uses in urban villages that are not within an urban center or the Station Area Overlay District, if the ((~~non-residential~~)) nonresidential use is located within a frequent transit service area [5]		No minimum requirement
K.	((~~Non-residential~~)) Nonresidential uses permitted in MR and HR zones pursuant to Section 23.45.504		No minimum requirement
L.	((~~Non-residential~~)) Nonresidential uses permitted in II zones		No minimum requirement

Footnotes for Table A for 23.54.015

[1] No parking is required for urban farms or community gardens in residential zones.

[2] Required parking for spectator sports facilities or exhibition halls must be available when the facility or exhibition hall is in use. A facility shall be considered to be "in use" during the period beginning three hours before an event is scheduled to begin and ending one hour after a scheduled event is expected to end. For sports events of

Table A for 23.54.015
Required parking for ((~~non-residential~~)) nonresidential uses other than institutions

Use	Minimum parking required
variable or uncertain duration, the expected event length shall be the average length of the events of the same type for which the most recent data are available, provided it is within the past five years. During an inaugural season, or for nonrecurring events, the best available good faith estimate of event duration will be used. A facility will not be deemed to be "in use" by virtue of the fact that administrative or maintenance personnel are present. The Director may reduce the required parking for any event when projected attendance for a spectator sports facility is certified to be 50 percent or less of the facility's seating capacity, to an amount not less than that required for the certified projected attendance, at the rate of one space for each ten fixed seats of certified projected attendance. An application for reduction and the certification shall be submitted to the Director at least 15 days prior to the event. When the event is one of a series of similar events, such certification may be submitted for the entire series 15 days prior to the first event in the series. If the Director finds that a certification of projected attendance of 50 percent or less of the seating capacity is based on satisfactory evidence such as past attendance at similar events or advance ticket sales, the Director shall, within 15 days of such submittal, notify the facility operator that a reduced parking requirement has been approved, with any conditions deemed appropriate by the Director to ensure adequacy of parking if expected attendance should change. The parking requirement reduction may be applied for only if the goals of the facility's Transportation Management Plan are otherwise being met. The Director may revoke or modify a parking requirement reduction approval during a series, if projected attendance is exceeded. [3] For indoor sports and recreation uses that exceed 25,000 square feet in size in a Manufacturing Industrial Center, the minimum requirement is ((~~1~~)) one space for each 2,000 square feet. [4] The amount of required parking is calculated based on the maximum number of staff or animals the center is designed to accommodate. [5] The general minimum requirements of Part I of Table A for 23.54.015 are superseded to the extent that a use, structure, or development qualifies for either a greater or a lesser minimum parking requirement (which may include no requirement) under any other provision. To the extent that a ((~~non-residential~~)) nonresidential use fits within more than one line in Table A for 23.54.015, the least of the applicable minimum parking requirements applies. The different parking requirements listed for certain categories of ((~~non-residential~~)) nonresidential uses shall not be construed to create separate uses for purposes of any requirements related to establishing or changing a use under this Title 23.	

Table B for 23.54.015 **Required parking for residential uses**		
Use		**Minimum parking required**
I. General residential uses		
((~~A.~~	~~Adult family homes~~	~~1 space for each dwelling unit~~))
((~~B~~)) A.	Artist's studio/dwellings [1, 2, 3]	1 space for each 2 dwelling units
((~~C~~)) B.	Assisted living facilities [1, 2, 3]	1 space for each 4 assisted living units; plus 1 space for each 2 staff members on-site at peak staffing time; plus 1 barrier-free passenger loading and unloading space
((~~D~~)) C.	Caretaker's quarters [1, 2, 3]	1 space for each 2 dwelling units
((~~E~~)) D.	Congregate residences [1, 2, 3]	1 space for each 4 sleeping rooms
((~~F.~~	~~Cottage housing developments~~ [~~1~~]	~~1 space for each dwelling unit~~
~~G.~~	~~Floating homes~~	~~1 space for each dwelling unit~~))
((~~H~~)) E.	Mobile home parks [1, 2, 3]	1 space for each 2 mobile home lots as defined in Chapter 22.904
((~~I.~~	~~Multifamily residential uses, except as otherwise provided in this Table B for 23.54.015~~ [~~1, 2~~]	~~1 space per dwelling unit, or 1 space for each 2 small efficiency dwelling units~~))
~~J.~~	~~Nursing homes~~	~~1 space for each 2 staff doctors; plus 1 additional space for each 3 employees; plus 1 space for each 6 beds~~))

Table B for 23.54.015 **Required parking for residential uses**		
Use		**Minimum parking required**
((~~K~~))F.	((~~Single-family dwelling units~~)) Housing [1, 2, 3, 4]	1 space for each 2 dwelling units
II. Residential use requirements for specific areas		
((~~L~~)) G.	All residential uses within urban centers or within the Station Area Overlay District [2]	No minimum requirement
((~~M~~)) H.	All residential uses ((~~in commercial, RSL, and multifamily zones~~)) within urban villages that are not within urban center or the Station Area Overlay District if the residential use is located within a frequent transit service area or within ½ mile of a major transit stop [2((4))]	No minimum requirement
I.	All residential uses within ½ mile of a major transit stop [2]	No minimum requirement
((~~N.~~	~~Multifamily residential uses within the University of Washington parking impact area shown on Map A for 23.54.015~~ [~~2~~]	~~1 space per dwelling unit for dwelling units with fewer than 2 bedrooms; plus 1.5 spaces per dwelling units with 2 or more bedrooms; plus 0.25 spaces per bedroom for dwelling units with 3 or more bedrooms~~))
~~O.~~	~~Multifamily dwelling units, within the Alki area shown on Map B for 23.54.015~~ [~~2~~]	~~1.5 spaces for each dwelling unit~~

Table B for 23.54.015 **Required parking for residential uses**		
Use		**Minimum parking required**
~~P.~~	~~Congregate residences located within one-half mile walking distance of a major transit stop~~	~~No minimum requirement~~))

Footnotes to Table B for 23.54.015

[1] For each moderate-income unit and each low-income unit, no minimum amount of parking is required.

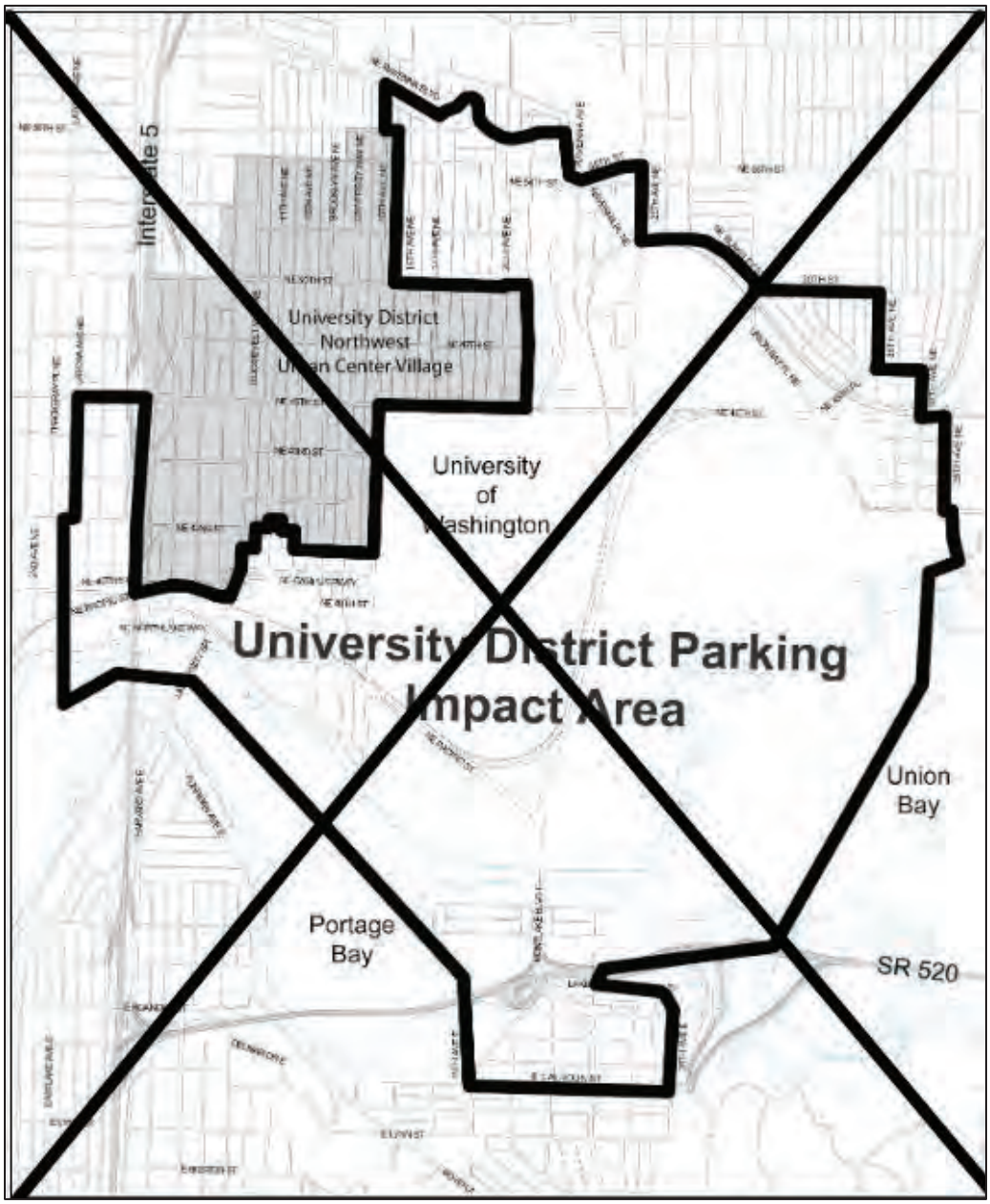
[2] The minimum amount of parking prescribed by Part I of Table B for 23.54.015 does not apply if a use, structure, or development qualifies for a ((~~greater or a~~)) lesser amount of minimum parking, including no parking, under any other provision of this Section 23.54.015. If more than one provision in this Table B for 23.54.015 is applicable, the provision requiring the least amount of minimum parking applies((~~, except that if item O in Part II of Table B for 23.54.015 applies, it shall supersede any other requirement in Part I or Part II of this Table B for 23.54.015~~)).

[3] A reduction or waiving of parking requirements may be permitted if the Director finds that the reduction or waiver is necessary in order to protect a Tier 2 tree as defined in Chapter 25.11.

[4] No parking is required for ((~~single-family residential uses~~)) accessory dwelling units or for principle dwelling units on lots in any residential zone that are less than 3,000 square feet in size or less than 30 feet in width where access to parking is permitted through a required ((~~yard or~~)) setback abutting a street according to the standards of subsections ((~~23.44.016.B.2~~)) 23.44.036.D.2, 23.45.536.C.2, or 23.45.536.C.3.

((~~4. Except as provided in Footnote 4, the minimum amounts of parking prescribed by Part 1 of Table B for 23.54.015 apply within 1,320 feet of the Fauntleroy Ferry Terminal.~~))

((~~Map A for 23.54.015: University District Parking Impact Area~~))



((~~Map B for 23.54.015: Alki Area Parking Overlay~~))

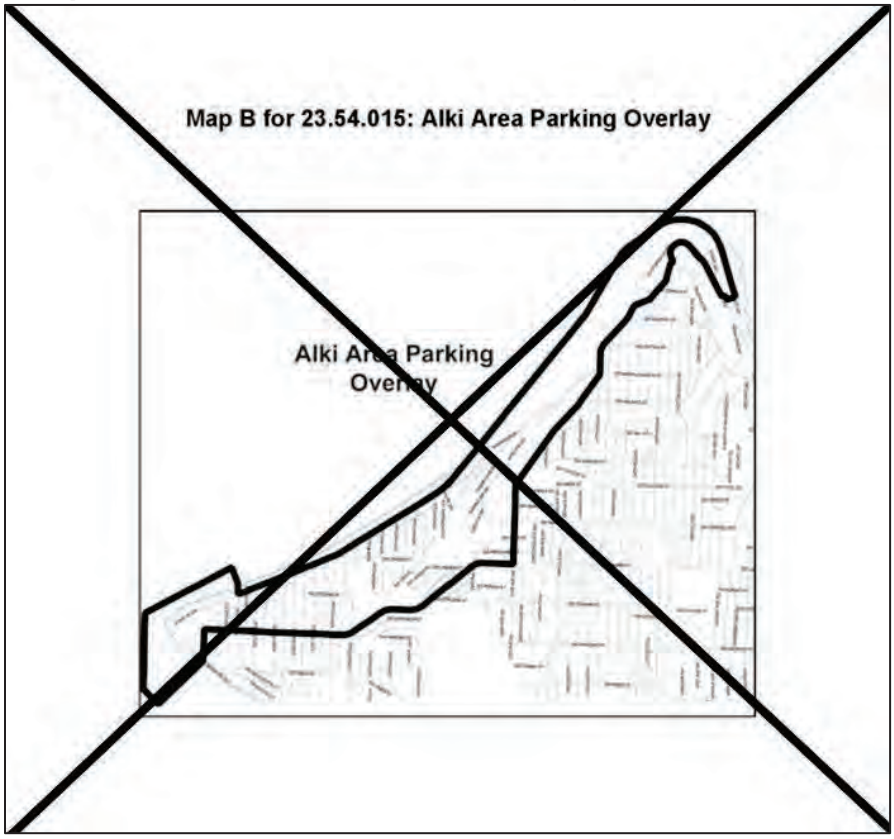


Table C for 23.54.015 **Required parking for public uses and institutions**		
Use		**Minimum parking required**
I. General public uses and institutions		
A.	Adult care centers [1, 2, 3]	1 space for each 10 adults (clients) or 1 space for each staff member, whichever is greater; plus 1 loading and unloading space for each 20 adults (clients)

Table C for 23.54.015 **Required parking for public uses and institutions**		
Use		**Minimum parking required**
B.	Child care centers [2, 3, 4, ((12)) 5]	1 space for each 10 children or 1 space for each staff member, whichever is greater; plus 1 loading and unloading space for each 20 children
C.	Colleges	A number of spaces equal to 15 percent of the maximum number of students that the facility is designed to accommodate; plus 30 percent of the number of employees the facility is designed to accommodate; plus 1 space for each 100 square feet of spectator assembly area in outdoor spectator sports facilities
D.	Community centers owned and operated by the Seattle Department of Parks and Recreation (SPR) [1, 6]	1 space for each 555 square feet; or for family support centers, 1 space for each 100 square feet
E.	Community clubs, and community centers not owned and operated by SPR [1, ((5,)) 7, 8]	1 space for each 80 square feet of floor area of all auditoria and public assembly rooms containing fixed seats; plus 1 space for each 350 square feet of all other indoor areas
F.	Community farms [((5)) 8]	1 space plus 1 space for each 10,000 square feet of site area, or 10 spaces, whichever is less
G.	Hospitals	1 space for each 2 staff doctors; plus 1 additional space for each 5 employees

Table C for 23.54.015 Required parking for public uses and institutions		
Use		**Minimum parking required**
		other than staff doctors; plus 1 space for each 6 beds
H.	Institutes for advanced study, except in ((~~neighborhood residential~~)) Neighborhood Residential zones	1 space for each 1,000 square feet of offices and similar spaces; plus 1 space for each 10 fixed seats in all auditoria and public assembly rooms; or 1 space for each 100 square feet of public assembly area not containing fixed seats
I.	Institutes for advanced study in ((~~neighborhood residential~~)) Neighborhood Residential zones (existing) [1]	3.5 spaces for each 1,000 square feet of office space; plus 10 spaces for each 1,000 square feet of additional building footprint to house and support conference center activities; or 37 spaces for each 1,000 square feet of conference room space, whichever is greater
J.	Libraries [1, ((~~5,~~)) 8, 9]	1 space for each 80 square feet of floor area of all auditoria and public meeting rooms containing fixed seats; plus 1 space for each 500 square feet of floor area of all other areas
K.	Museums [1]	1 space for each 80 square feet of all auditoria and public assembly rooms, not containing fixed seats; plus 1 space for every 10 fixed seats for floor area containing fixed seats; plus 1 space for each 250 square feet of other gross floor area open to the public

Table C for 23.54.015 **Required parking for public uses and institutions**		
Use		**Minimum parking required**
L.	Private clubs	1 space for each 80 square feet of floor area of all auditoria and public assembly rooms not containing fixed seats; or 1 space for every 8 fixed seats for floor area containing fixed seats; or if no auditorium or assembly room, 1 space for each 350 square feet, excluding ball courts
M.	Religious facilities [1]	1 space for each 80 square feet of all auditoria and public assembly rooms
N.	Schools, private elementary and secondary [1]	1 space for each 80 square feet of all auditoria and public assembly rooms, or if no auditorium or assembly room, 1 space for each staff member
O.	Schools, public elementary and secondary [7, ((9,)) 10, 11]	1 space for each 80 square feet of all auditoria or public assembly rooms, or 1 space for every 8 fixed seats in auditoria or public assembly rooms containing fixed seats, for new public schools on a new or existing public school site
P.	Vocational or fine arts schools	1 space for each 2 faculty that the facility is designed to accommodate; plus 1 space for each 2 full-time employees other than faculty that the facility is designed to accommodate; plus 1 space for each 5 students, based on the maximum number of students that the school is designed to accommodate

Table C for 23.54.015 **Required parking for public uses and institutions**		
Use		**Minimum parking required**
II. General public uses and institutions for specific areas		
Q.	General public uses, institutions and Major Institution uses, except hospitals, in urban centers or the Station Area Overlay District ((~~11~~)) 12	No minimum requirement
R.	General public uses and institutions, except hospitals, including institutes for advanced study in ((~~neighborhood residential~~)) Neighborhood Residential zones, within urban villages that are not within the Station Area Overlay District, if the use is located within a frequent transit service area	No minimum requirement

Footnotes to Table C for 23.54.015

[1] When this use is permitted in a ((~~neighborhood residential~~)) Neighborhood Residential zone as a conditional use, the Director may modify the parking requirements pursuant to Section 23.44.022; when the use is permitted in a multifamily zone as a conditional use, the Director may modify the parking requirements pursuant to Section 23.45.570.

[2] The amount of required parking is calculated based on the maximum number of staff, children, or clients that the center is designed to accommodate on site at any one time.

[3] As a Type I decision, the Director, in consultation with the Director of the Seattle Department of Transportation, may allow adult care and child care

Table C for 23.54.015 Required parking for public uses and institutions	
Use	**Minimum parking required**
centers to provide loading and unloading spaces on street, if not prevented by current or planned transportation projects adjacent to their property, when no other alternative exists. [4] A child care facility, when co-located with an assisted living facility, may count the passenger load/unload space required for the assisted living facility toward its required passenger load/unload spaces. [5] ((~~When this use is permitted outright in a neighborhood residential or multifamily zone, the Director may reduce the parking and loading requirements of Section 23.54.015 and the requirements of Section 23.44.016 or Section 23.45.536 on a case-by-case basis if the applicant can demonstrate that the modification is necessary due to the specific features, activities, or programs of the institution and links the reduction to the features of the institution that justify the reduction. Such modifications shall be valid only under the conditions specified, and if those conditions change, the standard requirement shall be satisfied.~~)) <u>The Director may reduce the minimum parking requirements for a child care center in any zone if a portion of its parking demand can be accommodated in nearby on-street parking</u> [6] When family support centers are located within community centers owned and operated by the Department of Parks and Recreation, the Director may lower the combined parking requirement by up to a maximum of 15 percent, pursuant to subsection 23.54.020.I. [7] Indoor gymnasiums are not considered ball courts, nor are they considered auditoria or public assembly rooms unless they contain bleachers (fixed seats). If the gymnasium contains bleachers, the parking requirement for the gymnasium is one parking space for every eight fixed seats. Each 20 inches of width of bleachers is counted as one fixed seat for the purposes of determining parking requirements. If the gymnasium does not contain bleachers and is in a school, there is no parking requirement for the gymnasium. If the gymnasium does not contain bleachers and is in a community center, the parking requirement is one space for each 350 square feet. [8] <u>When this use is permitted outright in a Neighborhood Residential or multifamily zone, the Director may reduce the parking and loading requirements of Section 23.54.015 and the requirements of Section 23.44.016 or Section 23.45.536 on a case-by-case basis if the applicant can demonstrate that the modification is necessary due to the specific features, activities, or</u>	

Table C for 23.54.015 Required parking for public uses and institutions	
Use	**Minimum parking required**
programs of the institution and links the reduction to the features of the institution that justify the reduction. Such modifications shall be valid only under the conditions specified, and if those conditions change, the standard requirement shall be satisfied. [9] When a library is permitted in a multifamily or commercial zone as a conditional use, the Director may modify the parking requirements of Section 23.54.015 and the requirements of Section 23.45.536 or Sections 23.47A.030 and 23.47A.032 on a case-by-case basis if the applicant can demonstrate that the modification is necessary due to the specific features, activities, or programs of the institution and links the reduction to the features of the institution that justify the reduction. Such modifications shall be valid only under the conditions specified, and if those conditions change, the standard requirement shall be satisfied. ((~~9~~))[10] For public schools, when an auditorium or other place of assembly is demolished and a new one built in its place, parking requirements are determined based on the new construction. When an existing public school on an existing public school site is remodeled, additional parking is required if any auditorium or other place of assembly is expanded or additional fixed seats are added. Additional parking is required as shown in this Table C for 23.54.015 for the increase in floor area or increase in number of seats only. If the parking requirement for the increased area or seating is ((~~10~~)) ten percent or less than that for the existing auditorium or other place of assembly, then no additional parking is required. ((~~10~~))[11] Development standard departures may be granted or required pursuant to the procedures and criteria set forth in Chapter 23.79 to reduce the required or permitted number of parking spaces. ((~~11~~))[12] The general requirements of lines A through P of this Table C for 23.54.015 for general public uses and institutions, and requirements of subsection 23.54.016.B for Major Institution uses, are superseded to the extent that a use, structure, or development qualifies for either a greater or a lesser parking requirement (which may include no requirement) under any other provision. To the extent that a general public use, institution, or Major Institution use fits within more than one line in this Table C for 23.54.015, the least of the applicable parking requirements applies. The different parking requirements listed for certain categories of general public uses or institutions	

Table C for 23.54.015 Required parking for public uses and institutions	
Use	**Minimum parking required**
shall not be construed to create separate uses for purposes of any requirements related to establishing or changing a use under this Title 23. ((12 ~~The Director may reduce the minimum parking requirements for a child care center in any zone if a portion of its parking demand can be accommodated in nearby on-street parking.~~))	

((~~K. Bicycle parking. The minimum number of parking spaces for bicycles required for specified uses is set forth in Table D for 23.54.015. Long-term parking for bicycles shall be for bicycles parked four or more hours. Short-term parking for bicycles shall be for bicycles parked less than four hours. In the case of a use not shown on Table D for 23.54.015, one bicycle parking space per 10,000 gross square feet of either short- or long-term bicycle parking is required, except single-family residential use is exempt from bicycle parking requirements. The minimum requirements are based upon gross floor area of the use in a structure minus gross floor area in parking uses, or the square footage of the use when located outside of an enclosed structure, or as otherwise specified.~~

~~1. Rounding. For long-term bicycle parking, calculation of the minimum requirement shall round up the result to the nearest whole number. For short-term bicycle parking, calculation of the minimum requirement shall round up the result to the nearest whole even number.~~

~~2. Performance standards. Provide bicycle parking in a highly visible, safe, and convenient location, emphasizing user convenience and theft deterrence, based on rules promulgated by the Director of the Seattle Department of Transportation that address the considerations in this subsection 23.54.015.K.2.~~

~~a. Provide secure locations and arrangements of long-term bicycle parking, with features such as locked rooms or cages and bicycle lockers. The bicycle parking should be installed in a manner that avoids creating conflicts with automobile accesses and driveways.~~

~~b. For a garage with bicycle parking and motor vehicle parking for more than two dwelling units, provide pedestrian and bicycle access to long-term bicycle parking that is separate from other vehicular entry and egress points or uses the same entry or egress point but has a marked walkway for pedestrians and bicyclists.~~

c. Provide adequate lighting in the bicycle parking area and access routes to it.

d. If short-term bicycle parking facilities are not clearly visible from the street or sidewalk or adjacent on-street bicycle facilities, install directional signage in adequate amounts and in highly visible locations in a manner that promotes easy wayfinding for bicyclists.

e. Provide signage to long-term bicycle parking that is oriented to building users.

f. Long-term bicycle parking shall be located where bicyclists are not required to carry bicycles on exterior stairs with more than five steps to access the parking. The Director, as a Type I decision, may allow long-term bicycle parking for rowhouse and townhouse development to be accessed by stairs with more than five steps, if the slope of the lot makes access with five or fewer steps infeasible.

g. Where practicable, long-term bicycle parking shall include a variety of rack types to accommodate different types of bicycles.

h. Install bicycle parking hardware so that it can perform to its manufacturer's specifications and any design criteria promulgated by the Director of the Seattle Department of Transportation, allowing adequate clearance for bicycles and their riders.

i. Provide full weather protection for all required long-term bicycle parking.

3. Location of bicycle parking

a. Long-term bicycle parking required for residential uses shall be located on-site except as provided in subsection 23.54.015.K.3.c.

b. Short-term bicycle parking may be provided on the lot or in an adjacent right-of-way, subject to approval by the Director of the Seattle Department of Transportation, or as provided in subsection 23.54.015.K.3.c.

c. Both long-term and short-term bicycle parking for residential uses may be provided off-site if within 600 feet of the residential use to which the bicycle parking is accessory and if the site of the bicycle parking is functionally interrelated to the site of the residential use to which the bicycle parking is accessory, such as within a unit lot subdivision or if the sites are connected by access easements, or if a covenant or similar property right is established to allow use of the off-site bicycle parking.

4. Long-term bicycle parking required for small efficiency dwelling units and congregate residence sleeping rooms is required to be covered for full weather protection. If the required, covered long-term bicycle parking is located inside the

building that contains small efficiency dwelling units or congregate residence sleeping rooms, the space required to provide the required long-term bicycle parking shall be exempt from floor area ratio (FAR) limits. Covered long-term bicycle parking that is provided beyond the required bicycle parking shall not be exempt from FAR limits.

5. Bicycle parking facilities shared by more than one use are encouraged.

6. Except as provided in subsection 23.54.015.K.7, bicycle parking facilities required for non-residential uses shall be located:

a. On the lot; or

b. For a functionally interrelated campus containing more than one building, in a shared bicycle parking facility within 600 feet of the lot; or

c. Short-term bicycle parking may be provided in an adjacent right-of-way, subject to approval by the Director of the Seattle Department of Transportation.

7. For non-residential uses on a functionally interrelated campus containing more than one building, both long-term and short-term bicycle parking may be located in an off-site location within 600 feet of the lot, and short-term public bicycle parking may be provided in a right-of-way, subject to approval by the Director of the Seattle Department of Transportation. The Director of the Seattle Department of Transportation may consider whether bicycle parking in the public place shall be sufficient in quality to effectively serve bicycle parking demand from the site.

8. Bicycle commuter shower facilities. Structures containing 100,000 square feet or more of office use floor area shall include shower facilities and clothing storage areas for bicycle commuters. Two showers shall be required for every 100,000 square feet of office use. They shall be available in a manner that results in equal shower access for all users. The facilities shall be for the use of the employees and occupants of the building, and shall be located where they are easily accessible to bicycle parking facilities, which may include in places accessible by elevator from the bicycle parking location.

9. Bicycle parking spaces within dwelling units or on balconies do not count toward the bicycle parking requirement, except if the bike parking spaces are located:

a. In a private garage; or

b. Within the ground floor of a dwelling unit in a townhouse or rowhouse development.

Table D for 23.54.015 **Parking for bicycles** [1]				
USE			**Bike parking requirements**	
			Long-term	**Short-term**
A. COMMERCIAL USES				
A.1.	Eating and drinking establishments		1 per 5,000 square feet	1 per 1,000 square feet
A.2.	Entertainment uses other than theaters and spectator sports facilities		1 per 10,000 square feet	Equivalent to 5 percent of maximum building capacity rating
	A.2.a.	Theaters and spectator sports facilities	1 per 10,000 square feet	Equivalent to 8 percent of maximum building capacity rating [2]
A.3.	Lodging uses		3 per 40 rentable rooms	1 per 20 rentable rooms plus 1 per 4,000 square feet of conference and meeting rooms
A.4.	Medical services		1 per 4,000 square feet	1 per 2,000 square feet
A.5.	Offices and laboratories, research and development		1 per 2,000 square feet	1 per 10,000 square feet
A.6.	Sales and services, general		1 per 4,000 square feet	1 per 2,000 square feet

Table D for 23.54.015 **Parking for bicycles** [1]			
USE		**Bike parking requirements**	
		Long-term	**Short-term**
A.7.	Sales and services, heavy	1 per 4,000 square feet	1 per 10,000 square feet of occupied floor area; 2 spaces minimum
B. INSTITUTIONS			
B.1.	Institutions not listed below	1 per 4,000 square feet	1 per 10,000 square feet
B.2.	Child care centers	1 per 4,000 square feet	1 per 20 children. 2 spaces minimum
B.3.	Colleges	1 per 5,000 square feet	1 per 2,500 square feet
B.4.	Community clubs or centers	1 per 4,000 square feet	1 per 1,000 square feet
B.5.	Hospitals	1 per 4,000 square feet	1 per 10,000 square feet
B.6.	Libraries	1 per 4,000 square feet	1 per 2,000 square feet
B.7.	Museums	1 per 4,000 square feet	1 per 2,000 square feet
B.8.	Religious facilities	1 per 4,000 square feet	1 per 2,000 square feet
B.9.	Schools, primary and secondary	3 per classroom	1 per classroom

Table D for 23.54.015
Parking for bicycles [1]

USE		**Bike parking requirements**	
		Long-term	**Short-term**
B.10.	Vocational or fine arts schools	1 per 5,000 square feet	1 per 2,500 square feet
C. MANUFACTURING USES		1 per 4,000 square feet	1 per 20,000 square feet
D. RESIDENTIAL USES [3]			
D.1	Congregate residences [4]	1 per sleeping room	1 per 20 sleeping rooms. 2 spaces minimum
D.2	Multifamily structures other than townhouse and rowhouse developments [4, 5]	1 per dwelling unit	1 per 20 dwelling units
D.3	Single-family residences	None	None
D.4	Townhouse and rowhouse developments [5]	1 per dwelling unit	None
E. TRANSPORTATION FACILITIES			
E.1.	Park and ride facilities on surface parking lots	At least 20 [6]	At least 10
E.2.	Park and ride facilities in parking garages	At least 20 if parking is the principal use of a property; zero if non-parking uses are the principal use of a property	At least 10 if parking is the principal use of a property; zero if non-parking uses are the principal use of a property

Table D for 23.54.015
Parking for bicycles [1]

USE		**Bike parking requirements**	
		Long-term	**Short-term**
E.3.	Flexible-use parking garages and flexible-use parking surface lots	1 per 20 auto spaces	None
E.4.	Rail transit facilities and passenger terminals	Spaces for 5 percent of projected AM peak period daily ridership [6]	Spaces for 2 percent of projected AM peak period daily ridership

Footnotes to Table D for 23.54.015

[1] Required bicycle parking includes long-term and short-term amounts shown in this Table D for 23.54.015.

[2] The Director may reduce short-term bicycle parking requirements for theaters and spectator sport facilities that provide bicycle valet services authorized through a Transportation Management Program. A bicycle valet service is a service that allows bicycles to be temporarily stored in a secure area, such as a monitored bicycle corral.

[3] For residential uses, after the first 50 spaces for bicycles are provided, additional spaces are required at three-quarters the ratio shown in this Table D for 23.54.015.

[4] For congregate residences or multifamily structures that are owned and operated by a not-for-profit entity serving seniors or persons with disabilities, or that are licensed by the State and provide supportive services for seniors or persons with disabilities, as a Type I decision, the Director shall have the discretion to reduce the amount of required bicycle parking to as few as zero if it can be demonstrated that residents are less likely to travel by bicycle.

[5] In low-income housing, there is no minimum required long-term bicycle parking requirement for each unit subject to affordability limits no higher than 30 percent of median income and long-term bicycle parking requirements may be waived by the Director as a Type I decision for each unit subject to affordability limits greater than 30 percent of median income and no higher than 80 percent of median income if a reasonable alternative is provided (e.g., in-unit vertical bike storage).

[6] The Director, in consultation with the Director of Transportation, may require more bicycle parking spaces based on the following factors: area topography; pattern and volume of expected bicycle users; nearby residential and employment density; proximity to the Urban Trails system and other existing and planned bicycle facilities;

~~Table D for 23.54.015~~ ~~Parking for bicycles~~ [1]		
~~USE~~	~~Bike parking requirements~~	
	~~Long-term~~	~~Short-term~~
~~projected transit ridership and expected access to transit by bicycle; and other relevant transportation and land use information.~~))		

Section 36. Section 23.54.020 of the Seattle Municipal Code, last amended by Ordinance 126509, is amended as follows:

23.54.020 Parking quantity exceptions

Note: This section is being updated to reflect new state requirements contained in SB 6015.

The motor vehicle parking quantity exceptions set forth in this Section 23.54.020 apply in all zones except downtown zones, which are regulated by Section 23.49.019, and Major Institution zones, which are regulated by Section 23.54.016.

A. Adding ((~~Units~~)) units to ((~~Existing Structures~~)) existing structures in Multifamily and Commercial ((~~Zones.~~)) zones

1. For the purposes of this Section 23.54.020, "existing structures" means those structures that were established under permit, or for which a permit has been granted and has not expired as of the applicable date, as follows:

a. In multifamily zones, August 10, 1982;

b. In commercial zones, June 9, 1986.

2. In locations in a multifamily or commercial zone where there is a minimum parking requirement, one dwelling unit may either be added to an existing structure or may be built on a lot that contains an existing structure without additional parking if both of the following requirements are met:

a. Either the existing parking provided on the lot meets development standards, or the lot area is not increased and existing parking is screened and landscaped to the greatest extent practical; and

b. Any additional parking shall meet all development standards for the zone.

3. In locations in a multifamily or commercial zone where there is a minimum parking requirement, the Director may authorize a reduction or waiver of the parking requirement as a Type I decision when dwelling units are proposed to be added either to an existing structure or on a lot that contains an existing structure, in addition to the exception permitted in subsection 23.54.020.A.2, if the conditions in subsection((~~s~~)) 23.54.020.A.3.a ((~~and b~~)) below are met, and either of the conditions in subsections ((~~23.54.020.A.3.c or d~~)) 23.54.020.A.3.b or 23.54.020.A.3.c below are met:

a. The only use of the structure will be residential; and

b. ((~~The lot is not located in either the University District Parking Overlay Area (Map A for 23.54.015) or the Alki Area Parking Overlay (Map B for 23.54.015); and~~

~~c.~~)) The topography of the lot or location of existing structures makes provision of an off-street parking space physically infeasible in a conforming location; or

((~~d~~)) c. The lot is located in a residential parking zone (RPZ) and a current parking study is submitted showing a utilization rate of less than 75 percent for on-street parking within 400 feet of all lot lines.

B. Tandem Parking in Multifamily Structures. ((~~1.~~)) Off-street parking required for multifamily structures may be provided as tandem parking, as defined in Section 23.54.030. ((~~A tandem parking space counts as one and one-half parking spaces, except as provided in subsection 23.54.020.B.2 below, and must meet the minimum size requirements of subsection 23.54.030.A.~~

~~2. When a minimum of at least one parking space per dwelling unit in a multifamily structure is required, the total number of parking spaces provided, counting each tandem parking space as one space, may not be less than the total number of dwelling units.~~)) A tandem parking space counts at a rate of one space for every 20 linear feet of depth excluding any necessary provisions for manuevering.

* * *

Section 37. Section 23.54.030 of the Seattle Municipal Code, last amended by Ordinance 127099, is amended as follows:

23.54.030 Parking space and access standards

Note: This section would be updated to comply with parking space dimensions required by SB 6015 and reflect new definitions for building types. This section is also proposed to be separated into multiple sections consistent with modern code drafting sections.

All parking spaces provided, whether required by Section 23.54.015 or not, and required barrier-free parking, shall meet the standards of this Section 23.54.030.

A. Parking space dimensions

1. "Large vehicle" means the minimum size of a large vehicle parking space shall be ((~~8.5~~)) 8 feet in width and 19 feet in length.

2. "Medium vehicle" means the minimum size of a medium vehicle parking space shall be 8 feet in width and 16 feet in length.

3. "Small vehicle" means the minimum size of a small vehicle parking space shall be 7.5 feet in width and 15 feet in length.

4. "Barrier-free parking" means a parking space meeting the following standards:

a. Parking spaces shall not be less than 8 feet in width and shall have an adjacent access aisle not less than 5 feet in width. Van-accessible parking spaces shall have an adjacent access aisle not less than 8 feet in width. Where two adjacent spaces are provided, the access aisle may be shared between the two spaces. Boundaries of access aisles shall be marked so that aisles will not be used as parking space.

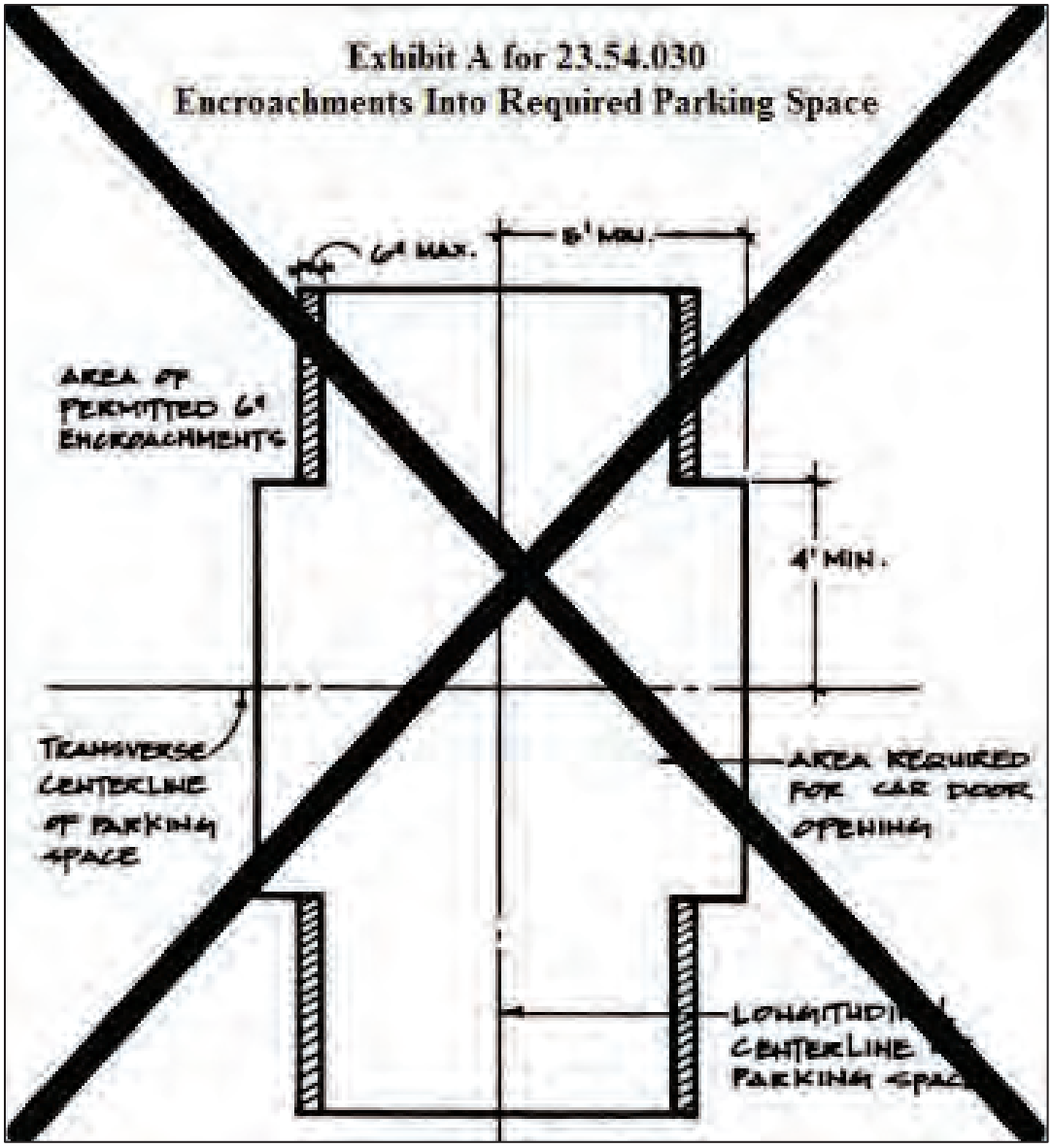
b. A minimum length of 19 feet or when more than one barrier-free parking space is provided, at least one shall have a minimum length of 19 feet, and other spaces may be the lengths of small, medium, or large spaces in approximate proportion to the number of each size space provided on the lot.

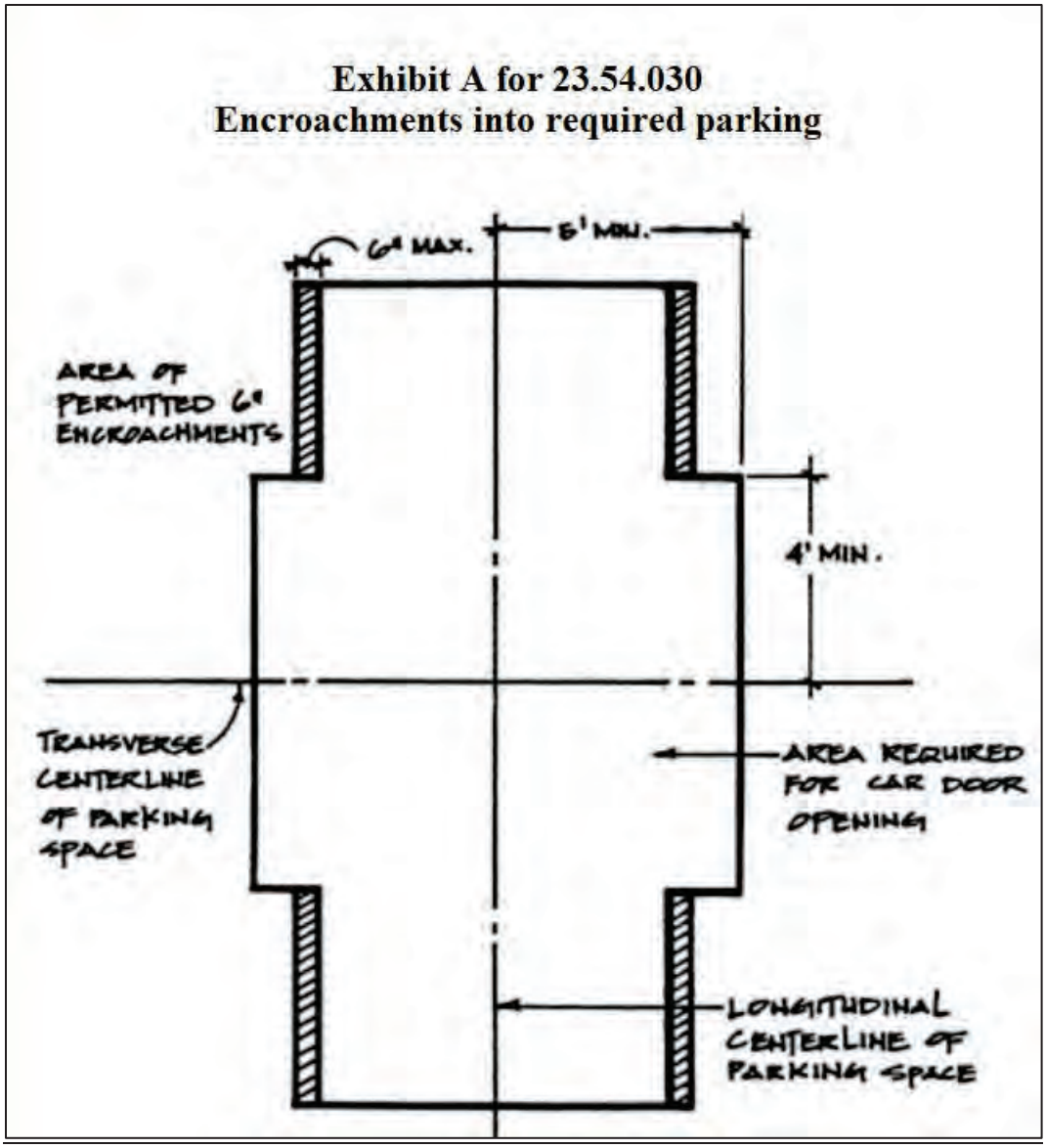
5. "Tandem parking" means a parking space equal to the width and two times the length of the vehicle size standards in subsections 23.54.030.A.1, 23.54.030.A.2, and 23.54.030.A.3 for the size of the vehicle to be accommodated.

6. No wall, post, guardrail, or other obstruction, or lot line, is permitted within the area for car door opening. Columns or other structural elements may encroach into the parking space a maximum of 6 inches on a side, except in the area for car door opening 5 feet from the longitudinal centerline, or 4 feet from the transverse centerline of a parking space (see Exhibit A for 23.54.030).

7. If the parking space is next to a lot line and the parking space is parallel to the lot line, the minimum width of the space is 9 feet.

Exhibit A for 23.54.030
Encroachments ((~~Into Required Parking Space~~)) <u>into required parking space</u>





B. Parking space requirements. The required size of parking spaces shall be determined by whether the parking is for a residential, live-work, or ((~~non-residential~~)) nonresidential use. In structures containing residential uses and also containing either (~~non-residential~~)) nonresidential uses or live-work units, parking that is clearly set aside and reserved for residential or live-work use shall meet the standards of subsection 23.54.030.B.1. Parking for all other uses within the structure shall meet the standards of subsection 23.54.030.B.2. All uses shall provide barrier-free accessible parking if required by the Seattle Building Code or the Seattle Residential Code.

1. Residential uses

a. When five or fewer parking spaces are provided, the minimum required size of a parking space shall be for a medium vehicle, as described in subsection 23.54.030.A.2, except as provided in subsection 23.54.030.B.1.d.

b. When more than five parking spaces are provided, a minimum of 60 percent of the parking spaces shall be striped for medium vehicles. The minimum size for a medium parking space shall also be the maximum size. Forty percent of the parking spaces may be striped for any size category in subsection 23.54.030.A, provided that when parking spaces are striped for large vehicles, the minimum required aisle width shall be as shown for medium vehicles.

c. Assisted living facilities. Parking spaces shall be provided as in subsections 23.54.030.B.1.a and 23.54.030.B.1.b, except that a minimum of two spaces shall be striped for a large vehicle.

d. ((~~Townhouse unit.~~)) For an individual garage serving ((~~a townhouse~~)) an individual dwelling unit, the minimum required size of a parking space shall be for a medium vehicle, as described in subsection 23.54.030.A.

2. (~~Non-residential~~)) Nonresidential uses

a. When ten or fewer parking spaces are provided, a maximum of 25 percent of the parking spaces may be striped for small vehicles. A minimum of 75 percent of the spaces shall be striped for large vehicles.

b. When between 11 and 19 parking spaces are provided, a minimum of 25 percent of the parking spaces shall be striped for small vehicles. The minimum required size for these small parking spaces shall also be the maximum size. A maximum of 65 percent of the parking spaces may be striped for small vehicles. A minimum of 35 percent of the spaces shall be striped for large vehicles.

c. When 20 or more parking spaces are provided, a minimum of 35 percent of the parking spaces shall be striped for small vehicles. The minimum required size for small parking spaces shall also be the maximum size. A maximum of 65 percent of the parking spaces may be striped for small vehicles. A minimum of 35 percent of the spaces shall be striped for large vehicles.

d. The minimum vehicle clearance shall be at least 6 feet 9 inches on at least one floor, and there shall be at least one direct entrance that is at least 6 feet 9 inches in height for all parking garages accessory to (~~non-residential~~)) nonresidential uses and live-work units and for all flexible-use parking garages.

3. Live-work uses. The first required parking space shall meet the parking standards for residential use. Additional required parking for a live-work use shall meet the parking standards for ((~~non-residential~~)) nonresidential use.

C. Backing ((~~Distances~~)) distances and ((~~Moving Other Vehicles.~~)) moving other vehicles

1. Adequate ingress to and egress from all parking spaces shall be provided without having to move another vehicle, except in the case of multiple spaces provided for a single((~~-family~~)) dwelling unit ((~~or an accessory dwelling unit associated with a single-family dwelling,~~)) or in the case of tandem parking authorized under ((~~Section~~)) subsection 23.54.020.B.

2. Except for lots with fewer than three parking spaces, ingress to and egress from all parking spaces shall be provided without requiring backing more than 50 feet.

D. Driveways. Driveway requirements for residential and nonresidential uses are described below. When a driveway is used for both residential and nonresidential parking, it shall meet the standards for nonresidential uses described in subsection 23.54.030.D.2.

1. Residential uses((~~.~~))

a. Driveway width. Driveways less than 100 feet in length that serve 30 or fewer parking spaces shall be a minimum of 10 feet in width for one-way or two-way traffic.

b. Except for driveways serving one ((~~single-family~~)) dwelling unit, driveways more than 100 feet in length that serve 30 or fewer parking spaces shall either:

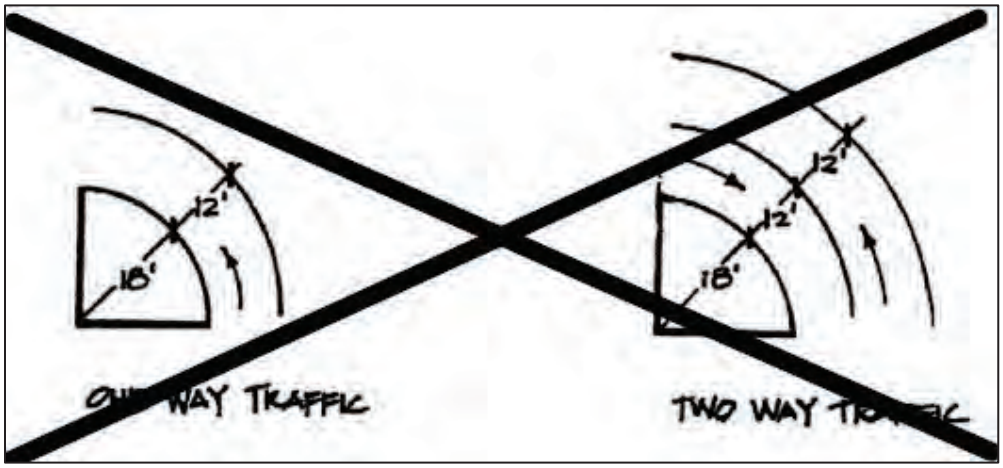
1) be a minimum of 16 feet wide, tapered over a 20 foot distance to a 10 foot opening at the lot line; or

2) be a minimum of 10 feet wide and provide a passing area at least 20 feet wide and 20 feet long. The passing area shall begin 20 feet from the lot line, with an appropriate taper to meet the 10 foot opening at the lot line. If a taper is provided at the other end of the passing area, it shall have a minimum length of 20 feet.

c. Driveways of any length that serve more than 30 parking spaces shall be at least 10 feet wide for one-way traffic and at least 20 feet wide for two-way traffic.

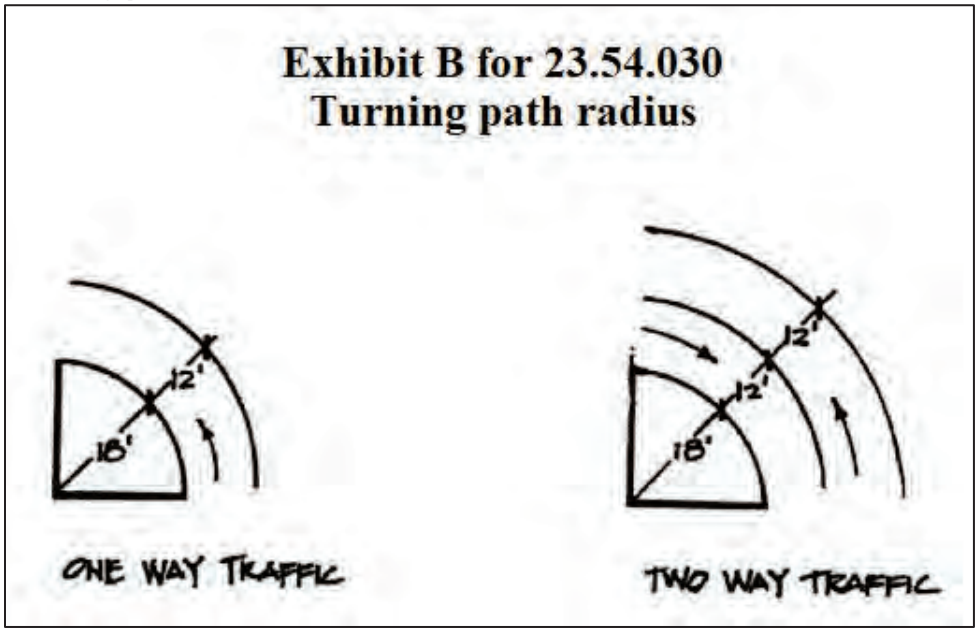
d. Driveways for two attached ((~~rowhouse or townhouse~~)) dwelling units may be paired so that there is a single curb cut providing access. The maximum width of the paired driveway is 18 feet.

e. Driveways with a turning radius of more than 35 degrees shall conform to the minimum turning path radius shown in Exhibit B for 23.54.030.



((**~~Exhibit B for 23.54.030: Turning Path Radius~~**))

Exhibit B for 23.54.030
Turning path radius



f. Vehicles may back onto a street from a parking area serving five or fewer vehicles, provided that either:

1) The street is not an arterial as defined in Section 11.18.010; or

2) For a lot with one ((~~single-family~~)) dwelling unit, the Director may permit backing onto an arterial based on a safety analysis that addresses visibility, traffic volume, and other relevant issues.

g. Nonconforming driveways. The number of parking spaces served by an existing driveway that does not meet the standards of this subsection 23.54.030.D.1 shall not be increased. This prohibition may be waived by the Director after consulting with the Director of the Seattle Department of Transportation, based on a safety analysis.

2. Nonresidential ((~~Uses.~~)) uses

a. Driveway ((~~Widths.~~)) widths

1) The minimum width of driveways for ((~~one way~~)) one-way traffic shall be 12 feet and the maximum width shall be 15 feet.

2) The minimum width of driveways for ((~~two way~~)) two-way traffic shall be 22 feet and the maximum width shall be 25 feet.

b. Driveways shall conform to the minimum turning path radius shown in Exhibit B for 23.54.030.

c. For driveways that provide access to a solid waste management use the Director may allow both a maximum driveway width greater than the limits set in subsection 23.54.030.D.2.a and appropriate turning path radii, as determined necessary for truck maneuvering.

3. Driveway slope for all uses. No portion of a driveway, whether located on a lot or on a right-of- way, shall exceed a slope of 15 percent, except as provided in this subsection 23.54.030.D.3. The maximum 15 percent slope shall apply in relation to both the current grade of the right-of-way to which the driveway connects, and to the proposed finished grade of the right-of-way if it is different from the current grade. The ends of a driveway shall be adjusted to accommodate an appropriate crest and sag. The Director may permit a driveway slope of more than 15 percent if it is found that:

a. The topography or other special characteristic of the lot makes a 15 percent maximum driveway slope infeasible;

b. The additional amount of slope permitted is the least amount necessary to accommodate the conditions of the lot; and

c. The driveway is still useable as access to the lot.

E. Parking aisles

1. Parking aisles shall be provided according to the requirements of Table A for 23.54.030 and Exhibit C for 23.54.030.

Table A for 23.54.030
Parking aisle dimensions

A	B	C	D	E	F	G
Parking Angle (in degrees)	Stall Width	Stall Length (in feet)	Aisle Width (in feet)[1]	Curb Depth Per Car (in feet)	Unit Width (in feet) [2]	Curb Length Per Car (in feet)
0°	Small	18	10	7.5	25	18
	Medium	20	10	8	26	20
	Large	24	12	8	28	24
45°	Small	15	11	15.91	42.82	10.61
	Medium	16	13	16.97	46.94	11.3
	Large	19	13	19.09	51.18	11.3
60°	Small	15	13	16.74	46.48	8.66
	Medium	16	15	17.86	50.72	9.24
	Large	19	17.5	20.45	58.41	9.24
75°	Small	15	16.5	16.43	49.36	7.76
	Medium	16	18.5	17.52	53.55	8.25
	Large	19	20	20.42	60.84 [2]	8.25
90°	Small	15	20	15	50	7.5
	Medium	16	22	16	54	8
	Large	19	24 [3]	19	62.0 [2]	8

Footnotes for Table A for 23.54.030

[1] Required aisle width is for one-way traffic only. If two-way traffic is proposed, then the minimum aisle width shall be 20 feet or greater.

[2] 60 feet may be substituted for required unit width on lots where the available width is in 60-foot whole multiples, provided that the minimum width of the parking stalls shall be 9 feet

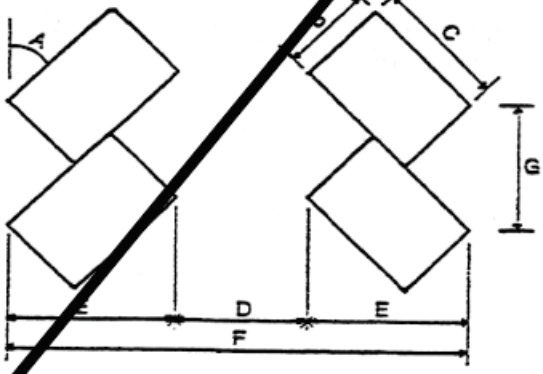
[3] For lots 44 feet in width or less, the Director may reduce the aisle width to as low as 20 feet if large parking spaces are provided at 90 degrees as long as the spaces are 9 feet wide.

A Parking Angle	B Stall Width	C Stall Length	D Aisle Width [1]	E Curb Depth Per Car	F Unit Width [3]	G Curb Length Per Car
0°	7.5	18.0	10.0	7.5	25.0	18.0
	8.0	20.0	10.0	8.0	26.0	20.0
	8.5	24.0	12.0	8.5	29.0	24.0
45°	7.5	15.0	11.0	15.91	42.82	10.61
	8.0	16.0	13.0	16.97	46.90	11.3
	8.5	19.0	13.0	19.44	51.88	12.02
60°	7.5	15.0	13.0	16.74	46.48	8.66
	8.0	16.0	15.0	17.86	50.72	9.24
	8.5	19.0	17.5	20.70	58.90	9.82
75°	7.5	15.0	16.5	16.43	59.36	7.76
	8.0	16.0	18.5	17.52	53.54	8.25
	8.5	19.0	20.0	20.55	61.10 [3]	8.80
90°	7.5	15.0	20.0	15.0	50.0	7.5
	8.0	16.0	22.0	16.0	54.0	8.0
	8.5	19.0 [2]	24.0 [2]	19.0	62.0 [3]	8.5

[1] Required aisle width is for one-way traffic only. If two-way traffic is proposed, then the minimum aisle width shall be 20 feet or greater.

[2] When lot width is less than 43 feet, 40 feet may be substituted for a two-way aisle and a single row of cars at 90° to the aisle, provided that the minimum width of the parking stalls shall be 9½ feet.

[3] 60 feet may be substituted for required unit width on lots where the available width is in 60-foot whole multiples, provided that the minimum width of the parking stalls shall be 9½ feet.



The following equations may be used to compute dimensions for parking angles other than those provided in the chart above:

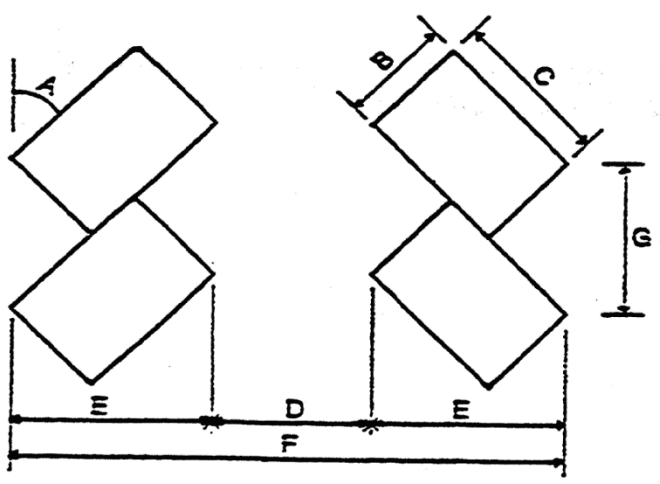
$E = C \sin A + B \cos A$

$G = B/\sin A$

NOTE: Aisle widths shall be provided as required for the next greater parking angle shown in the chart above.

((**Exhibit C for 23.54.030: Parking Aisle Dimensions**))

Exhibit C for 23.54.030
Parking aisle dimension measurement



The following equations may be used to compute dimensions for parking angles other than those provided in the chart above:

$E = C \sin A + B \cos A$

$G = B/\sin A$

NOTE: Aisle widths shall be provided as required for the next greater parking angle shown in the chart above.

2. Minimum aisle widths shall be provided for the largest vehicles served by the aisle.

3. Turning and maneuvering areas shall be located on private property, except that alleys may be credited as aisle space.

4. Aisle slope shall not exceed 17 percent provided that the Director may permit a greater slope if the criteria in subsections 23.54.030.D.3.a, 23.54.030.D.3.b, and 23.54.030.D.3.c are met.

((~~F. Curb cuts. The number of permitted curb cuts is determined by whether the parking served by the curb cut is for residential or nonresidential use, and by the zone in which the use is located. If a curb cut is used for more than one use or for one or more live-work units, the requirements for the use with the largest curb cut requirements shall apply.~~

~~1. Residential uses~~

~~a. Number of curb cuts~~

~~1) For lots not located on a principal arterial as designated by the Seattle Department of Transportation, curb cuts are permitted according to Table A for 23.54.030:~~

Table A for 23.54.030 **Curb cuts for lots not located on a principal arterial or easement frontage**	
Street or easement frontage of the lot	**Number of curb cuts permitted**
80 feet or less	1
Greater than 80 feet up to 160 feet	2
Greater than 160 feet up to 240 feet	3
Greater than 240 feet up to 320 feet	4
For lots with frontage in excess of 320 feet, the pattern established above continues.	

2) For lots on principal arterials as designated by the Seattle Department of Transportation, curb cuts are permitted according to Table B for 23.54.030:

Table B for 23.54.030 **Curb cuts for principal arterial street frontage**	
Street or easement frontage of the lot	**Number of curb cuts permitted**
160 feet or less	1
Greater than 160 feet up to 320 feet	2
Greater than 320 feet up to 480 feet	3
For lots with street frontage in excess of 480 feet, the pattern established above continues.	

3) On a lot that has both principal arterial and non-principal arterial street frontage, the total number of curb cuts on the principal arterial is calculated using only the length of the street lot line on the principal arterial.

4) If two adjoining lots share a common driveway, the combined frontage of the two lots will be considered as one in determining the maximum number of permitted curb cuts.

b. Curb cut width. Curb cuts shall not exceed a maximum width of 10 feet except that:

1) For lots on principal arterials as designated by the Seattle Department of Transportation, the maximum curb cut width is 23 feet;

2) One curb cut greater than 10 feet but in no case greater than 20 feet in width may be substituted for each two curb cuts permitted by subsection 23.54.030.F.1.a;

3) A greater width may be specifically permitted by the development standards in a zone;

4) If subsection 23.54.030.D requires a driveway greater than 10 feet in width, the curb cut may be as wide as the required width of the driveway; and

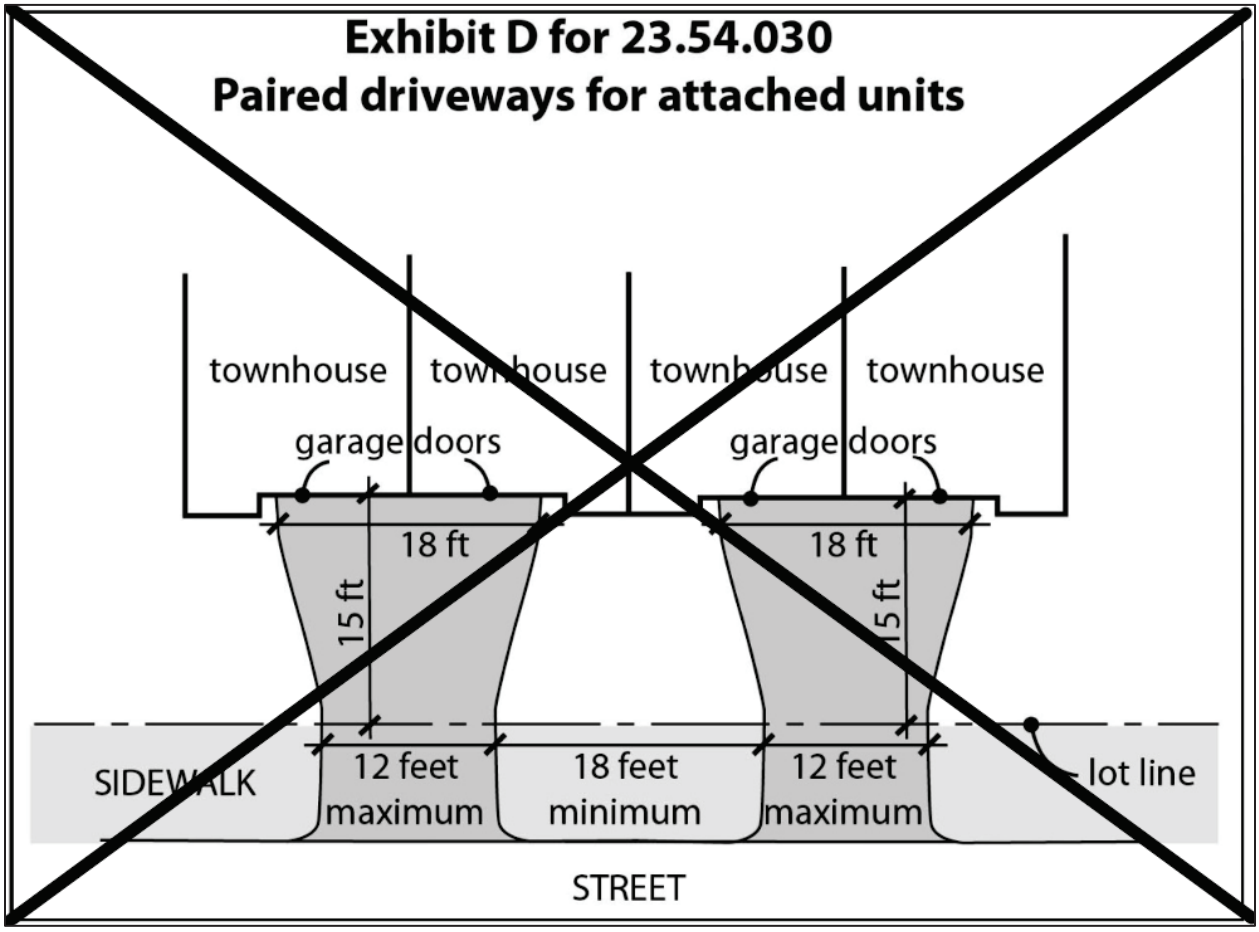
5) A curb cut may be less than the maximum width permitted but shall be at least as wide as the minimum required width of the driveway it serves.

c. Distance between curb cuts

1) The minimum distance between any two curb cuts located on a lot is 30 feet, except as provided in subsection 23.54.030.F.1.c.2).

2) For rowhouse and townhouse developments, the minimum distance between curb cuts is 18 feet (See Exhibit D for 23.54.030). For located on abutting lots, the minimum distance between curb cuts is 18 feet.

~~**Exhibit D for 23.54.030**~~
~~**Paired driveways for attached units**~~



~~2. Nonresidential uses in all zones except industrial zones~~

~~a. Number of curb cuts~~

~~1) In all residential zones, RC zones, and within the Major Institution Overlay District, two-way curb cuts are permitted according to Table C for 23.54.030:~~

Table C for 23.54.030 **Number of curb cuts in residential zones, RC zones and the Major Institution Overlay District**	
Street frontage of the lot	**Number of curb cuts permitted**
80 feet or less	1
Greater than 80 feet up to 240 feet	2
Greater than 240 feet up to 360 feet	3
Greater than 360 feet up to 480 feet	4
For lots with frontage in excess of 480 feet, one curb cut is permitted for every 120 feet of street frontage.	

2) The Director may allow two one-way curb cuts to be substituted for one two-way curb cut, after determining, as a Type I decision, that there would not be a significant conflict with pedestrian traffic.

3) The Director shall, as a Type I decision, determine the number and location of curb cuts in C1 and C2 zones and the location of curb cuts in SM zones.

4) In downtown zones, a maximum of two curb cuts for one-way traffic at least 40 feet apart, or one curb cut for two-way traffic, are permitted on each street front where access is permitted by subsection 23.49.019.H. No curb cut shall be located within 40 feet of an intersection. These standards may be modified by the Director as a Type I decision on lots with steep slopes or other special conditions, to the minimum extent necessary to provide vehicular and pedestrian safety and facilitate a smooth flow of traffic.

5) For public schools, the Director shall permit, as a Type I decision, the minimum number of curb cuts that the Director determines is necessary.

6) In NC zones, curb cuts shall be provided according to subsection 23.47A.032.A, or, when 23.47A.032.A does not specify the maximum number of curb cuts, according to subsection 23.54.030.F.2.a.1.

~~7) For police and fire stations the Director shall permit the minimum number of curb cuts that the Director determines is necessary to provide adequate maneuverability for emergency vehicles and access to the lot for passenger vehicles.~~

~~b. Curb cut widths~~

~~1) For one-way traffic, the minimum width of curb cuts is 12 feet, and the maximum width is 15 feet.~~

~~2) For two-way traffic, the minimum width of curb cuts is 22 feet, and the maximum width is 25 feet, except that the maximum width may be increased to 30 feet if truck and auto access are combined.~~

~~3) For public schools, the maximum width of a curb cut is 25 feet. Development standard departures may be granted or required pursuant to the procedures and criteria set forth in Chapter 23.79.~~

~~4) For fire and police stations, the Director may allow curb cuts up to, and no wider than, the minimum width necessary to provide access for official emergency vehicles that have limited maneuverability and that must rapidly respond to emergencies. Curb cuts for fire and police stations are considered curb cuts for two-way traffic.~~

~~5) If one of the following conditions applies, the Director may require a curb cut of up to 30 feet in width, if it is found that a wider curb cut is necessary for safe access:~~

~~i. The abutting street has a single lane on the side that abuts the lot; or~~

~~ii. The curb lane abutting the lot is less than 11 feet wide; or~~

~~iii. The proposed development is located on an arterial with an average daily traffic volume of over 7,000 vehicles; or~~

~~iv. Off-street loading berths are required according to Section 23.54.035.~~

~~c. The entrances to all garages accessory to nonresidential uses or live-work units and the entrances to all flexible-use parking garages shall be at least 6 feet 9 inches high.~~

~~3. All uses in industrial zones~~

~~a. Number and location of curb cuts. The number and location of curb cuts will be determined by the Director.~~

~~b. Curb cut width. Curb cut width in Industrial zones shall be as follows:~~

~~1) Except as set forth in subsection 23.54.030.F.3.b.4, if the curb cut provides access to a parking area or structure, it must be a minimum of 15 feet wide and a maximum of 30 feet wide.~~

~~2) If the curb cut provides access to a loading berth, the maximum width may be increased to 50 feet.~~

~~3) Within the minimum and maximum widths established by this subsection 23.54.030.F.3, the Director shall determine the size of the curb cuts.~~

~~4) If the curb cut provides access to a solid waste management use, the Director may determine the maximum width of the curb cut.~~

~~4. Curb cuts for access easements~~

~~a. If a lot is crossed by an access easement serving other lots, the curb cut serving the easement may be as wide as the easement roadway.~~

~~b. The curb cut serving an access easement shall not be counted against the number or amount of curb cuts permitted to a lot if the lot is not itself served by the easement.~~

~~5. Curb cut flare. A flare with a maximum width of 2.5 feet is permitted on either side of curb cuts in any zone.~~

~~6. Replacement of unused curb cuts. When a curb cut is no longer needed to provide access to a lot, the curb and any planting strip must be replaced.~~

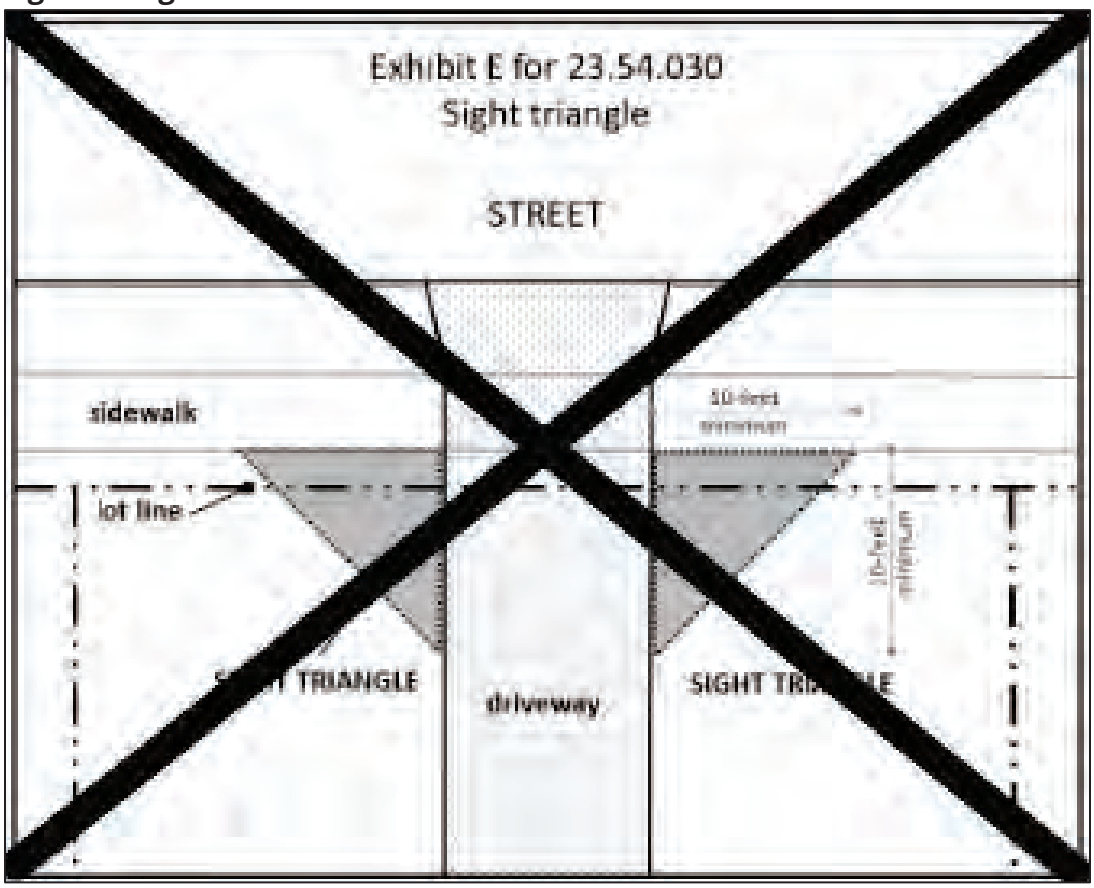
~~7. Curb cuts are not allowed on streets if alley access to a lot is feasible but has not been provided.~~

~~G. Sight triangle~~

~~1. For exit-only driveways and easements, and two way driveways and easements less than 22 feet wide, a sight triangle on both sides of the driveway or easement shall be provided, and shall be kept clear of any obstruction for a distance of~~

10 feet from the intersection of the driveway or easement with a driveway, easement, sidewalk or curb intersection if there is no sidewalk, as depicted in Exhibit E for 23.54.030.

Exhibit E for 23.54.030
Sight triangle



2. For two way driveways or easements 22 feet wide or more, a sight triangle on the side of the driveway used as an exit shall be provided, and shall be kept clear of any obstruction for a distance of 10 feet from the intersection of the driveway or easement with a driveway, easement, sidewalk, or curb intersection if there is no sidewalk. The entrance and exit lanes shall be clearly identified.

3. The sight triangle shall also be kept clear of obstructions in the vertical spaces between 32 inches and 82 inches from the ground.

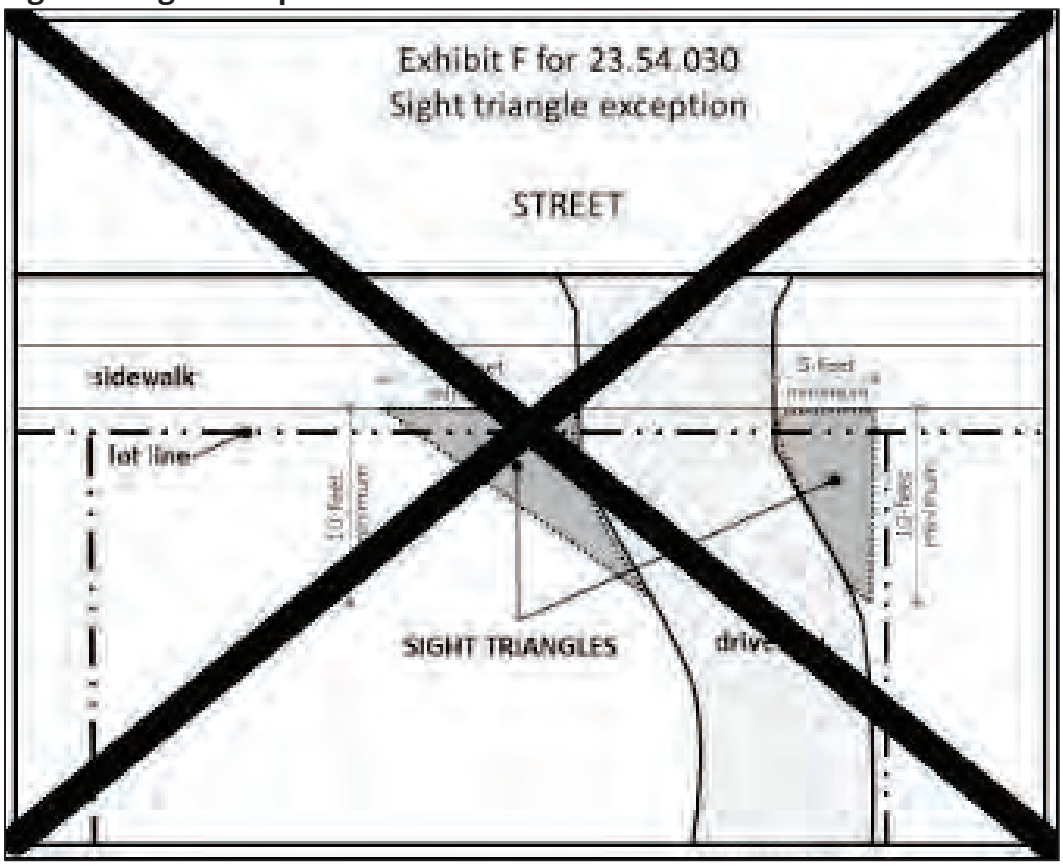
4. When the driveway or easement is less than 10 feet from the lot line, the sight triangle may be provided as follows:

a. An easement may be provided sufficient to maintain the sight triangle. The easement shall be recorded with the King County Recorder; or

~~b. The driveway may be shared with a driveway on the neighboring lot; or~~

~~c. The driveway or easement may begin 5 feet from the lot line, as depicted in Exhibit F for 23.54.030.~~

~~Exhibit F for 23.54.030~~
~~Sight triangle exception~~



~~5. An exception to the sight triangle requirement may be made for driveways serving lots containing only residential uses and fewer than three parking spaces, when providing the sight triangle would be impractical.~~

~~6. In all Downtown, Industrial, Commercial 1, and Commercial 2 zones, the sight triangle at a garage exit may be provided by mirrors and/or other approved safety measures.~~

~~7. Sight triangles are not required for one-way entrances into a parking garage or surface parking area.~~

~~8. Sight triangles are not required when access to parking is provided from an alley.~~))

((~~H~~)) F. Attendant ((~~Parking. In~~)) downtown zones, any off-street parking area or structure providing more than ((~~5~~)) five parking spaces where automobiles are parked solely by attendants employed for that purpose shall have parking spaces at least 8 feet in width, and 15 feet in length. Subsections ((~~A, B, C, D and E of this Section 23.54.030~~)) 23.54.030.A, 23.54.030.B, 2054.030.C, 23.54.030.D, and 23.54.030.E shall not apply, except that the grade curvature of any area used for automobile travel or storage shall not exceed that specified in subsection 23.54.030.D.3. Should attendant operation be discontinued, the provisions of subsections ((~~23.54.030 A, B, C, D and E~~)) 23.54.030.A, 23.54.030.B, 2054.030.C, 23.54.030.D, and 23.54.030.E shall apply to the parking.

((~~I~~)) G. Off-street ((~~Bus Parking~~)) bus parking. Bus parking spaces, when required, shall be 13 feet in width and 40 feet in length. Buses parked en masse shall not be required to have adequate ingress and egress from each parking space.

((~~J~~)) H. The Director may, as a Type I decision, modify any required dimension or distribution percentage of parking spaces identified in subsections 23.54.030.A or 23.54.030.B to allow more efficient use of a surface parking area or parking garage, when the parking area or parking garage provides adequate and safe circulation.

((~~K. Pedestrian access to garage. For new structures that include a garage, in a zone where flexible-use parking is permitted, at least one pedestrian access walkway or route shall be provided between a garage and a public right-of-way, which may be an alley, including a side-hinged door for pedestrian use. A fire exit door, or other access through lobbies, may serve this purpose if the access route and doors are accessible for ingress and egress by garage users.~~

~~L. Electric vehicle (EV) charging infrastructure. New parking spaces provided on a lot when a new building is constructed shall be "EV-ready" as specified in this subsection 23.54.030.L. The required number of EV-ready parking spaces shall be determined by whether the parking is for a residential or nonresidential use. Parking that is clearly set aside and reserved for residential use shall meet the standards of subsection 23.54.030.L.1; parking for all other uses within the structure shall meet the standards of subsection 23.54.030.L.2.~~

~~1. Residential uses~~

~~a. Private parking for individual residential units. When parking for any individual dwelling unit is provided in a private garage, carport, or parking area, separate from any parking facilities serving other units, at least one parking space in that garage, carport, or parking area shall be EV-ready.~~

b. Surface parking for multiple residences. When parking for multifamily residential uses is provided in a surface parking area serving multiple residences, the number of parking spaces that shall be EV-ready shall be as follows:

1) When between one and six parking spaces are provided, each of those parking spaces shall be EV-ready;

2) When between seven and 25 parking spaces are provided, a minimum of six of those parking spaces shall be EV-ready; and

3) When more than 25 parking spaces are provided, a minimum of 20 percent of those parking spaces shall be EV-ready.

c. Parking garages for multiple residences. When parking for multifamily residential uses is provided in a parking garage serving multiple residences, a minimum of 20 percent of those parking spaces shall be EV-ready.

d. Other residential uses. When parking is provided for all other residential uses, a minimum of 20 percent of those spaces shall be EV-ready.

2. Nonresidential uses. When parking is provided for nonresidential uses, a minimum of ten percent of those spaces shall be EV-ready.

3. Rounding. When calculating the number of required EV-ready parking spaces, any fraction or portion of an EV-ready parking space required shall be rounded up to the nearest whole number.

4. Reductions

a. The Director may, in consultation with the Director of Seattle City Light, reduce the requirements of this subsection 23.54.030.L as a Type I decision where there is substantial evidence substantiating that the added electrical load that can be attributed to meeting the requirements will:

1) Alter the local utility infrastructure design requirements on the utility side of the legal point of service, so as to require on-property power transformation; or

2) Require an upgrade to an existing residential electrical service.

b. In cases where the provisions of subsection 23.54.030.L.4.a have been met, the maximum quantity of EV charging infrastructure required to be installed shall be reduced to the maximum service size that would not require the changes to

~~transformation or electrical service in subsection 23.54.030.L.4.a. The Director may first reduce the required level of EV infrastructure at EV-ready parking spaces from 40-amp to 20-amp circuits. If necessary, the Director may also then reduce the number of required EV-ready parking spaces or otherwise reduce the level of EV infrastructure at EV-ready parking spaces.~~

~~c. The Director may establish by rule the procedures and documentation required for a reduction.~~

~~5. All EV charging infrastructure shall be installed in accordance with the Seattle Electrical Code. Where EV-ready surface parking spaces are located more than 4 feet from a building, raceways shall be extended to a pull box or stub in the vicinity of the designated space and shall be protected from vehicles.~~

~~6. Accessible parking. Where new EV-ready parking spaces and new accessible parking are both provided, parking facilities shall be designed so that at least one accessible parking space shall be EV-ready.~~

~~7. Nothing in this subsection 23.54.030.L shall be construed to modify the minimum number of off-street motor vehicle parking spaces required for specific uses or the maximum number of parking spaces allowed, as set forth in Section 23.54.015 or elsewhere in this Title 23.~~

~~8. This Section 23.54.030 does not require EV supply equipment, as defined by Article 100 of the Seattle Electrical Code, to be installed.~~))

Section 38. A new Section 23.54.031 is added to the Seattle Municipal Code as follows:

23.54.031 Curb cuts

Note: This new section is being created to move existing rules from Section 23.54.030 into a new section in order to break up a very large section. It would not change existing rules.

The number of permitted curb cuts is determined by whether the parking served by the curb cut is for residential or nonresidential use, and by the zone in which the use is located. If a curb cut is used for more than one use or for one or more live-work units, the requirements for the use with the largest curb cut requirements shall apply.

A. Residential uses

1. Number of curb cuts

a. For lots not located on a principal arterial as designated by the Seattle Department of Transportation, curb cuts are permitted according to Table A for 23.54.031:

Table A for 23.54.031 **Curb cuts for lots not located on a principal arterial or easement frontage**	
Street or easement frontage of the lot	**Number of curb cuts permitted**
80 feet or less	1
Greater than 80 feet up to 160 feet	2
Greater than 160 feet up to 240 feet	3
Greater than 240 feet up to 320 feet	4
For lots with frontage in excess of 320 feet, the pattern established above continues.	

b. For lots on principal arterials as designated by the Seattle Department of Transportation, curb cuts are permitted according to Table B for 23.54.031:

Table B for 23.54.031 **Curb cuts for principal arterial street frontage**	
Street or easement frontage of the lot	**Number of curb cuts permitted**
160 feet or less	1
Greater than 160 feet up to 320 feet	2
Greater than 320 feet up to 480 feet	3

Table B for 23.54.031 **Curb cuts for principal arterial street frontage**	
Street or easement frontage of the lot	**Number of curb cuts permitted**
For lots with street frontage in excess of 480 feet, the pattern established above continues.	

c. On a lot that has both principal arterial and non-principal arterial street frontage, the total number of curb cuts on the principal arterial is calculated using only the length of the street lot line on the principal arterial.

d. If two adjoining lots share a common driveway, the combined frontage of the two lots will be considered as one in determining the maximum number of permitted curb cuts.

2. Curb cut width. Curb cuts shall not exceed a maximum width of 10 feet except that:

a. For lots on principal arterials as designated by the Seattle Department of Transportation, the maximum curb cut width is 23 feet;

b. One curb cut greater than 10 feet but in no case greater than 20 feet in width may be substituted for each two curb cuts permitted by subsection 23.54.031.A.1;

c. A greater width may be specifically permitted by the development standards in a zone;

d. If subsection 23.54.030.D requires a driveway greater than 10 feet in width, the curb cut may be as wide as the required width of the driveway; and

e. A curb cut may be less than the maximum width permitted but shall be at least as wide as the minimum required width of the driveway it serves.

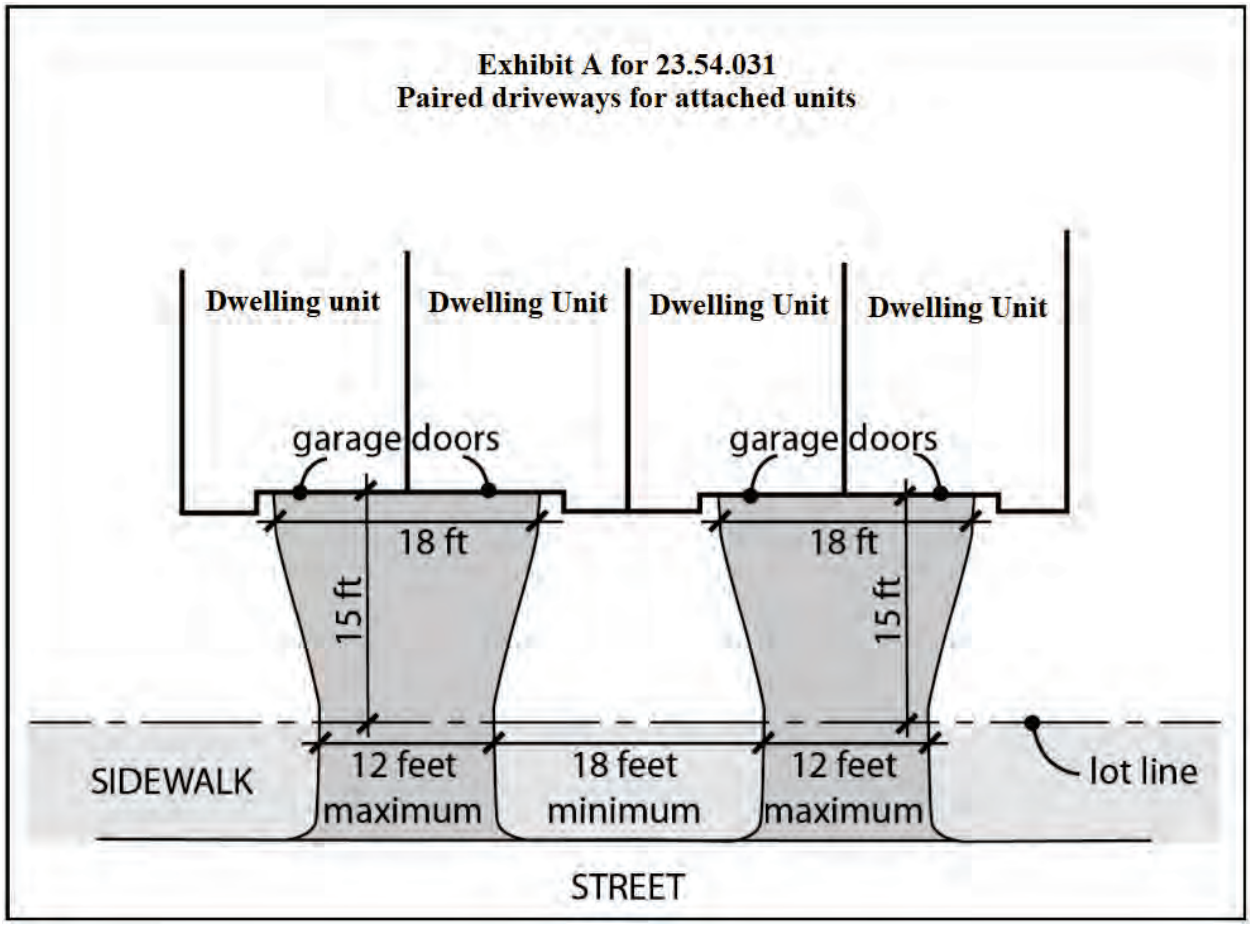
3. Distance between curb cuts

a. The minimum distance between any two curb cuts located on a lot is 30 feet, except as provided in subsection 23.54.031.A.3.b.

b. For attached dwelling units, the minimum distance between curb cuts is 18 feet (See Exhibit A for 23.54.031). For attached dwelling units located on abutting lots, the minimum distance between curb cuts is 18 feet.

Exhibit A for 23.54.031

Paired driveways for attached units



B. Nonresidential uses in all zones except industrial zones

1. Number of curb cuts

a. In all residential zones, RC zones, and within the Major Institution Overlay District, two-way curb cuts are permitted according to Table C for 23.54.031:

Table C for 23.54.031 **Number of curb cuts in residential zones, RC zones and the Major Institution Overlay District**	
Street frontage of the lot	**Number of curb cuts permitted**
80 feet or less	1
Greater than 80 feet up to 240 feet	2
Greater than 240 feet up to 360 feet	3
Greater than 360 feet up to 480 feet	4
For lots with frontage in excess of 480 feet, one curb cut is permitted for every 120 feet of street frontage.	

b. The Director may allow two one-way curb cuts to be substituted for one two-way curb cut, after determining, as a Type I decision, that there would not be a significant conflict with pedestrian traffic.

c. The Director shall, as a Type I decision, determine the number and location of curb cuts in C1 and C2 zones and the location of curb cuts in SM zones.

d. In downtown zones, a maximum of two curb cuts for one-way traffic at least 40 feet apart, or one curb cut for two-way traffic, are permitted on each street front where access is permitted by subsection 23.49.019.H. No curb cut shall be located within 40 feet of an intersection. These standards may be modified by the Director as a Type I decision on lots with steep slopes or other special conditions, to the minimum extent necessary to provide vehicular and pedestrian safety and facilitate a smooth flow of traffic.

e. For public schools, the Director shall permit, as a Type I decision, the minimum number of curb cuts that the Director determines is necessary.

f. In NC zones, curb cuts shall be provided according to subsection 23.47A.032.A, or, when subsection 23.47A.032.A does not specify the maximum number of curb cuts, according to subsection 23.54.031.B.1.a.

g. For police and fire stations the Director shall permit the minimum number of curb cuts that the Director determines is necessary to provide adequate maneuverability for emergency vehicles and access to the lot for passenger vehicles.

2. Curb cut widths

a. For one-way traffic, the minimum width of curb cuts is 12 feet, and the maximum width is 15 feet.

b. For two-way traffic, the minimum width of curb cuts is 22 feet, and the maximum width is 25 feet, except that the maximum width may be increased to 30 feet if truck and auto access are combined.

c. For public schools, the maximum width of a curb cut is 25 feet. Development standard departures may be granted or required pursuant to the procedures and criteria set forth in Chapter 23.79.

d. For fire and police stations, the Director may allow curb cuts up to, and no wider than, the minimum width necessary to provide access for official emergency vehicles that have limited maneuverability and that must rapidly respond to emergencies. Curb cuts for fire and police stations are considered curb cuts for two-way traffic.

e. If one of the following conditions applies, the Director may require a curb cut of up to 30 feet in width, if it is found that a wider curb cut is necessary for safe access:

1) The abutting street has a single lane on the side that abuts the lot; or

2) The curb lane abutting the lot is less than 11 feet wide; or

3) The proposed development is located on an arterial with an average daily traffic volume of over 7,000 vehicles; or

4) Off-street loading berths are required according to Section 23.54.035.

3. The entrances to all garages accessory to nonresidential uses or live-work units and the entrances to all flexible-use parking garages shall be at least 6 feet 9 inches high.

C. All uses in industrial zones

1. Number and location of curb cuts. The number and location of curb cuts will be determined by the Director.

2. Curb cut width. Curb cut width in Industrial zones shall be as follows:

a. Except as set forth in subsection 23.54.031.C.2.d, if the curb cut provides access to a parking area or structure, it must be a minimum of 15 feet wide and a maximum of 30 feet wide.

b. If the curb cut provides access to a loading berth, the maximum width may be increased to 50 feet.

c. Within the minimum and maximum widths established by this subsection 23.54.031.C, the Director shall determine the size of the curb cuts.

d. If the curb cut provides access to a solid waste management use, the Director may determine the maximum width of the curb cut.

D. Curb cuts for access easements

1. If a lot is crossed by an access easement serving other lots, the curb cut serving the easement may be as wide as the easement roadway.

2. The curb cut serving an access easement shall not be counted against the number or amount of curb cuts permitted to a lot if the lot is not itself served by the easement.

E. Curb cut flare. A flare with a maximum width of 2.5 feet is permitted on either side of curb cuts in any zone.

F. Replacement of unused curb cuts. When a curb cut is no longer needed to provide access to a lot, the curb and any planting strip must be replaced.

G. Curb cuts are not allowed on streets if alley access to a lot is feasible but has not been provided.

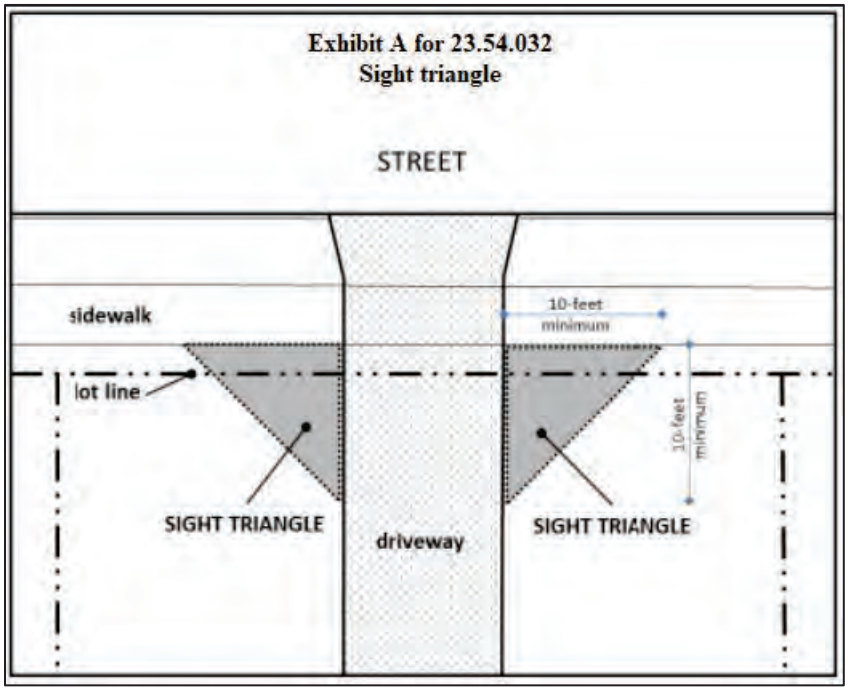
Section 39. A new Section 23.54.032 is added to the Seattle Municipal Code as follows

23.54.032 Sight Triangles

Note: This new section is being created to move existing rules from Section 23.54.030 into a new section in order to break up a very large section. It would not change existing rules.

A. For exit-only driveways and easements, and two way driveways and easements less than 22 feet wide, a sight triangle on both sides of the driveway or easement shall be provided and shall be kept clear of any obstruction for a distance of 10 feet from the intersection of the driveway or easement with a driveway, easement, sidewalk or curb intersection if there is no sidewalk, as depicted in Exhibit A for 23.54.032.

Exhibit A for 23.54.032
Sight triangle



B. For two-way driveways or easements 22 feet wide or more, a sight triangle on the side of the driveway used as an exit shall be provided, and shall be kept clear of any obstruction for a distance of 10 feet from the intersection of the driveway or easement with a driveway, easement, sidewalk, or curb intersection if there is no sidewalk. The entrance and exit lanes shall be clearly identified.

C. The sight triangle shall also be kept clear of obstructions in the vertical spaces between 32 inches and 82 inches from the ground.

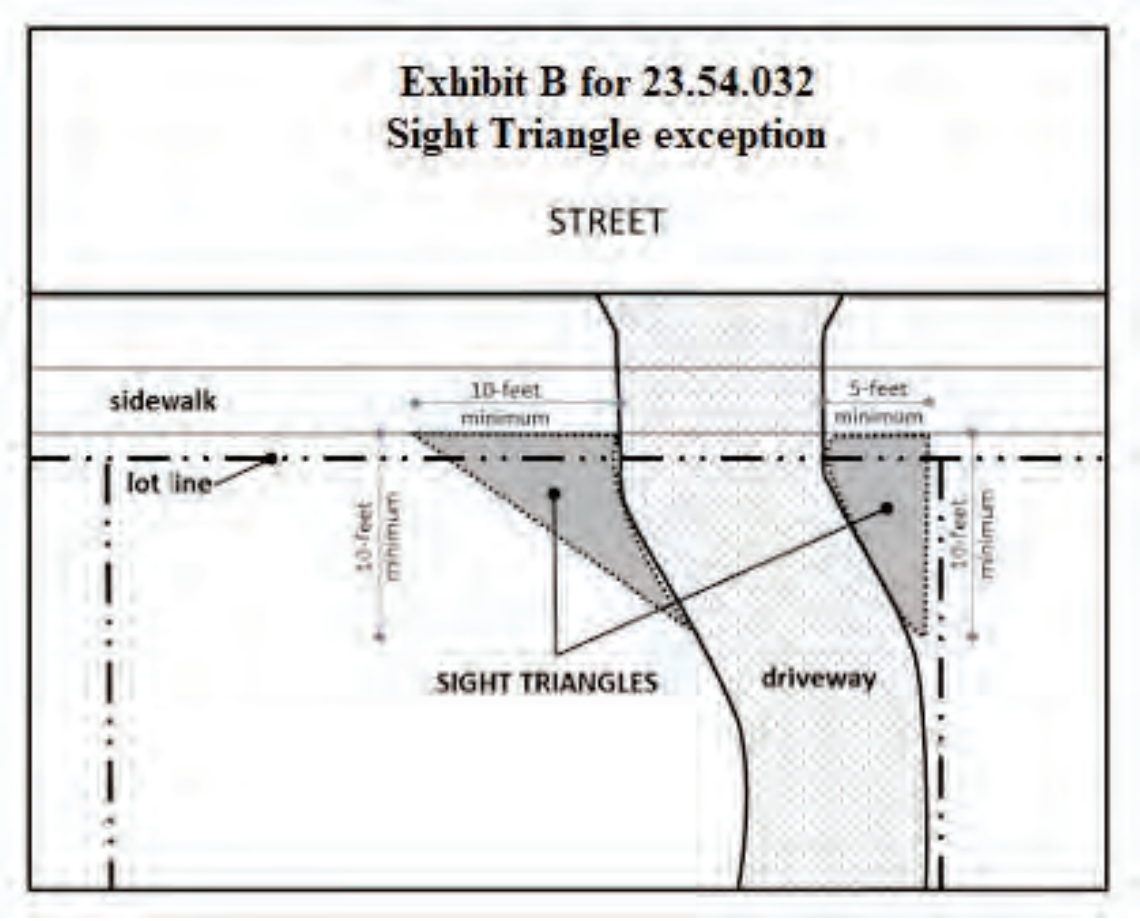
D. When the driveway or easement is less than 10 feet from the lot line, the sight triangle may be provided as follows:

1. An easement may be provided sufficient to maintain the sight triangle. The easement shall be recorded with the King County Recorder; or

2. The driveway may be shared with a driveway on the neighboring lot; or

3. The driveway or easement may begin 5 feet from the lot line, as depicted in Exhibit B for 23.54.032.

Exhibit B for 23.54.032
Sight triangle exception



E. An exception to the sight triangle requirement may be made for driveways serving lots containing only residential uses and fewer than three parking spaces, when providing the sight triangle would be impractical.

F. In all Downtown, Industrial, Commercial 1, and Commercial 2 zones, the sight triangle at a garage exit may be provided by mirrors and/or other approved safety measures.

G. Sight triangles are not required for one-way entrances into a parking garage or surface parking area.

H. Sight triangles are not required when access to parking is provided from an alley.

Section 40. A new Section 23.54.033 is added to the Seattle Municipal Code as follows:

23.54.033 Pedestrian access to garage

Note: This new section is being created to move existing rules from Section 23.54.030 into a new section in order to break up a very large section. It would not change existing rules.

For new structures that include a garage, in a zone where flexible-use parking is permitted, at least one pedestrian access walkway or route shall be provided between a garage and a public right-of-way, which may be an alley, including a side-hinged door for pedestrian use. A fire exit door, or other access through lobbies, may serve this purpose if the access route and doors are accessible for ingress and egress by garage users.

Section 41. A new Section 23.54.034 is added to the Seattle Municipal Code as follows:

23.54.034 Electric vehicle (EV) charging infrastructure

Note: This new section is being created to move existing rules from Section 23.54.030 into a new section in order to break up a very large section. The updated section includes changes to make it consistent with recent changes to the Seattle Electrical Code.

New parking spaces provided on a lot when a new building is constructed shall be "EV-ready" as specified in this Section 23.54.034. The required number of EV-ready parking spaces shall be determined by whether the parking is for a residential or nonresidential use. Parking that is clearly set aside and reserved for residential use shall meet the standards of subsection 23.54.034.A; parking for all other uses within the structure shall meet the standards of subsection 23.54.034.B.

A. Residential uses

1. Private parking for individual dwelling units. When parking for any individual dwelling unit is provided in a private garage, carport, or parking area, separate from any parking facilities serving other units, at least one parking space in that garage, carport, or parking area shall be EV-ready.

2. Surface parking for multiple dwelling units. When parking for multiple dwelling units is provided in a surface parking area serving multiple dwelling units, the number of parking spaces that shall be EV-ready shall be as follows:

a. For up to 25 provided parking spaces, the first 12 shall be EV-ready.

b. When more than 25 parking spaces are provided, 45 percent of all parking spaces shall be EV-ready.

3. Parking garages for multiple dwelling units. When parking for multiple dwelling units is provided in a parking garage serving multiple dwelling units, a minimum of 45 percent of those parking spaces shall be EV-ready.

B. Nonresidential uses. When parking is provided for nonresidential uses, a minimum of 30 percent of those spaces shall be EV-ready, except that the following uses are not required to provided EV-ready spaces:

1. Institutional uses

2. Eating and drinking establishments

3. Sales and service uses

C. Rounding. When calculating the number of required EV-ready parking spaces, any fraction or portion of an EV-ready parking space required shall be rounded up to the nearest whole number.

D. Reductions

1. The Director may, in consultation with the Director of Seattle City Light, reduce the requirements of this Section 23.54.034 as a Type I decision where there is substantial evidence substantiating that the added electrical load that can be attributed to meeting the requirements will:

a. Alter the local utility infrastructure design requirements on the utility side of the legal point of service, so as to require on-property power transformation; or

b. Require an upgrade to an existing residential electrical service.

2. In cases where the provisions of subsection 23.54.034.D.1 have been met, the maximum quantity of EV charging infrastructure required to be installed shall be reduced to the maximum service size that would not require the changes to transformation or electrical service in subsection 23.54.034.D.1. The Director may first reduce the required level of EV infrastructure at EV-ready parking spaces from 40-amp to 20-amp circuits. If necessary, the Director may also then reduce the number of required EV-ready parking spaces or otherwise reduce the level of EV infrastructure at EV-ready parking spaces.

3. The Director may establish by rule the procedures and documentation required for a reduction.

E. All EV charging infrastructure shall be installed in accordance with the Seattle Electrical Code. Where EV-ready surface parking spaces are located more than 4 feet from a building, raceways shall be extended to a pull box or stub in the vicinity of the designated space and shall be protected from vehicles.

F. Accessible parking. Where new EV-ready parking spaces and new accessible parking are both provided, parking facilities shall be designed so that at least 20 percent of the accessible parking space shall be EV-ready with no fewer than two EV-ready spaces.

G. Nothing in this subsection 23.54.034 shall be construed to modify the minimum number of off-street motor vehicle parking spaces required for specific uses or the maximum number of parking spaces allowed, as set forth in Section 23.54.015 or elsewhere in this Title 23.

H. This Section 23.54.034 does not require EV supply equipment, as defined by Article 100 of the Seattle Electrical Code, to be installed.

Section 42. A new Section 23.54.037 is added to the Seattle Municipal Code as follows:

23.54.037 Bicycle Parking

Note: This new section is being created to move existing rules from Section 23.54.030 into a new section in order to break up a very large section. It would not change existing rules.

A. Number of spaces

1. The minimum number of parking spaces for bicycles required for specified uses is set forth in Table A for 23.54.037.

2. Long-term parking for bicycles shall be for bicycles parked four or more hours. Short-term parking for bicycles shall be for bicycles parked less than four hours. In the case of a use not shown on Table A for 23.54.037, one bicycle parking space per 10,000 gross square feet of either short- or long-term bicycle parking is required.

3. The minimum requirements are based upon gross floor area of the use in a structure minus gross floor area in parking uses, or the square footage of the use when located outside of an enclosed structure, or as otherwise specified.

4. Rounding. For long-term bicycle parking, calculation of the minimum requirement shall round up the result to the nearest whole number. For short-term bicycle parking, calculation of the minimum requirement shall round up the result to the nearest whole even number.

Table A for 23.54.037
Parking for bicycles [1]

Use			**Bike parking requirements**	
			Long-term	**Short-term**
A. COMMERCIAL USES				
A.1.	Eating and drinking establishments		1 per 5,000 square feet	1 per 1,000 square feet
A.2.	Entertainment uses other than theaters and spectator sports facilities		1 per 10,000 square feet	Equivalent to 5 percent of maximum building capacity rating
	A.2.a.	Theaters and spectator sports facilities	1 per 10,000 square feet	Equivalent to 8 percent of maximum building capacity rating [2]
A.3.	Lodging uses		3 per 40 rentable rooms	1 per 20 rentable rooms plus 1 per 4,000 square

			feet of conference and meeting rooms
A.4.	Medical services	1 per 4,000 square feet	1 per 2,000 square feet
A.5.	Offices and laboratories, research and development	1 per 2,000 square feet	1 per 10,000 square feet
A.6.	Sales and services, general	1 per 4,000 square feet	1 per 2,000 square feet
A.7.	Sales and services, heavy	1 per 4,000 square feet	1 per 10,000 square feet of occupied floor area; 2 spaces minimum
B. INSTITUTIONS			
B.1.	Institutions not listed below	1 per 4,000 square feet	1 per 10,000 square feet
B.2.	Child care centers	1 per 4,000 square feet	1 per 20 children. 2 spaces minimum
B.3.	Colleges	1 per 5,000 square feet	1 per 2,500 square feet
B.4.	Community clubs or centers	1 per 4,000 square feet	1 per 1,000 square feet
B.5.	Hospitals	1 per 4,000 square feet	1 per 10,000 square feet
B.6.	Libraries	1 per 4,000 square feet	1 per 2,000 square feet
B.7.	Museums	1 per 4,000 square feet	1 per 2,000 square feet
B.8.	Religious facilities	1 per 4,000 square feet	1 per 2,000 square feet
B.9.	Schools, primary and secondary	3 per classroom	1 per classroom

B.10.	Vocational or fine arts schools	1 per 5,000 square feet	1 per 2,500 square feet
C. MANUFACTURING USES		1 per 4,000 square feet	1 per 20,000 square feet
D. RESIDENTIAL USES [3]			
D.1	Assisted Living Facility	None	None
D.2	Congregate residences [4, 5]	1 per sleeping room	1 per 20 sleeping rooms. 2 spaces minimum
D.3	Permanent supportive housing	None	None
D.4	Other residential uses [4, 5]	1 per dwelling unit	1 per 20 dwelling units, except none for projects with less than 20 dwelling units
E. TRANSPORTATION FACILITIES			
E.1.	Park and ride facilities on surface parking lots	At least 20 [6]	At least 10
E.2.	Park and ride facilities in parking garages	At least 20 if parking is the principal use of a property; zero if non-parking uses are the principal use of a property	At least 10 if parking is the principal use of a property; zero if non-parking uses are the principal use of a property
E.3.	Flexible-use parking garages and flexible-use parking surface lots	1 per 20 auto spaces	None
E.4.	Rail transit facilities and passenger terminals	Spaces for 5 percent of projected AM peak period daily ridership [6]	Spaces for 2 percent of projected AM peak period daily ridership

Footnotes to Table A for 23.54.037

[1] Required bicycle parking includes long-term and short-term amounts shown in this Table A for 23.54.037.

[2] The Director may reduce short-term bicycle parking requirements for theaters and spectator sport facilities that provide bicycle valet services authorized through a Transportation Management Program. A bicycle valet service is a service that allows bicycles to be temporarily stored in a secure area, such as a monitored bicycle corral.

[3] For residential uses, after the first 50 spaces for bicycles are provided, additional spaces are required at three-quarters the ratio shown in this Table A for 23.54.037.

[4] For congregate residences or multifamily structures that are owned and operated by a not-for-profit entity serving seniors or persons with disabilities, or that are licensed by the State and provide supportive services for seniors or persons with disabilities, as a Type I decision, the Director shall have the discretion to reduce the amount of required bicycle parking to as few as zero if it can be demonstrated that residents are less likely to travel by bicycle.

[5] In low-income housing, there is no minimum required long-term bicycle parking requirement for each unit subject to affordability limits no higher than 30 percent of median income and long-term bicycle parking requirements may be waived by the Director as a Type I decision for each unit subject to affordability limits greater than 30 percent of median income and no higher than 80 percent of median income if a reasonable alternative is provided (e.g., in-unit vertical bike storage).

[6] The Director, in consultation with the Director of Transportation, may require more bicycle parking spaces based on the following factors: area topography; pattern and volume of expected bicycle users; nearby residential and employment density; proximity to the Urban Trails system and other existing and planned bicycle facilities; projected transit ridership and expected access to transit by bicycle; and other relevant transportation and land use information.

B. Performance standards. Provide bicycle parking in a highly visible, safe, and convenient location, emphasizing user convenience and theft deterrence, based on rules promulgated by the Director of the Seattle Department of Transportation that address the considerations in this subsection 23.54.037.B.

1. Provide secure locations and arrangements of long-term bicycle parking, with features such as locked rooms or cages and bicycle lockers. The bicycle parking should be installed in a manner that avoids creating conflicts with automobile accesses and driveways.

2. For a garage with bicycle parking and motor vehicle parking for more than two dwelling units, provide pedestrian and bicycle access to long-term bicycle parking that is separate from other vehicular entry and egress points or uses the same entry or egress point but has a marked walkway for pedestrians and bicyclists.

3. Provide adequate lighting in the bicycle parking area and access routes to it.

4. If short-term bicycle parking facilities are not clearly visible from the street or sidewalk or adjacent on-street bicycle facilities, install directional signage in adequate amounts and in highly visible locations in a manner that promotes easy wayfinding for bicyclists.

5. Provide signage to long-term bicycle parking that is oriented to building users.

6. Long-term bicycle parking shall be located where bicyclists are not required to carry bicycles on exterior stairs with more than five steps to access the parking. The Director, as a Type I decision, may allow long-term bicycle parking for rowhouse and townhouse development to be accessed by stairs with more than five steps, if the slope of the lot makes access with five or fewer steps infeasible.

7. Where practicable, long-term bicycle parking shall include a variety of rack types to accommodate different types of bicycles.

8. Install bicycle parking hardware so that it can perform to its manufacturer's specifications and any design criteria promulgated by the Director of the Seattle Department of Transportation, allowing adequate clearance for bicycles and their riders.

9. Provide full weather protection for all required long-term bicycle parking.

C. Location of bicycle parking

1. Long-term bicycle parking required for residential uses shall be located on-site except as provided in subsection 23.54.037.C.3.

2. Short-term bicycle parking may be provided on the lot or in an adjacent right-of-way, subject to approval by the Director of the Seattle Department of Transportation, or as provided in subsection 23.54.037.C.3.

3. Both long-term and short-term bicycle parking for residential uses may be provided off-site if within 600 feet of the residential use to which the bicycle parking is accessory and if the site of the bicycle parking is functionally interrelated to the site of the residential use to which the bicycle parking is accessory, such as within a unit lot subdivision or if the sites are connected by access easements, or if a covenant or similar property right is established to allow use of the off-site bicycle parking.

D. Long-term bicycle parking required for small efficiency dwelling units and congregate residence sleeping rooms is required to be covered for full weather protection. If the required, covered long-term bicycle parking is located inside the building that contains small efficiency dwelling units or congregate residence sleeping

rooms, the space required to provide the required long-term bicycle parking shall be exempt from floor area ratio (FAR) limits. Covered long-term bicycle parking that is provided beyond the required bicycle parking shall not be exempt from FAR limits.

E. Bicycle parking facilities shared by more than one use are encouraged.

F. Except as provided in subsection 23.54.015.G, bicycle parking facilities required for nonresidential uses shall be located:

1. On the lot; or

2. For a functionally interrelated campus containing more than one building, in a shared bicycle parking facility within 600 feet of the lot; or

3. Short-term bicycle parking may be provided in an adjacent right-of-way, subject to approval by the Director of the Seattle Department of Transportation.

G. For nonresidential uses on a functionally interrelated campus containing more than one building, both long-term and short-term bicycle parking may be located in an off-site location within 600 feet of the lot, and short-term public bicycle parking may be provided in a right-of-way, subject to approval by the Director of the Seattle Department of Transportation. The Director of the Seattle Department of Transportation may consider whether bicycle parking in the public place shall be sufficient in quality to effectively serve bicycle parking demand from the site.

H. Bicycle commuter shower facilities. Structures containing 100,000 square feet or more of office use floor area shall include shower facilities and clothing storage areas for bicycle commuters. Two showers shall be required for every 100,000 square feet of office use. They shall be available in a manner that results in equal shower access for all users. The facilities shall be for the use of the employees and occupants of the building, and shall be located where they are easily accessible to bicycle parking facilities, which may include in places accessible by elevator from the bicycle parking location.

I. Bicycle parking spaces within dwelling units or on balconies do not count toward the bicycle parking requirement, except if the bike parking spaces are located:

1 In a private garage; or

2. Within the ground floor of a dwelling unit in a townhouse or rowhouse development.

Changes to Definitions

Section 43. Section 23.84A.002 of the Seattle Municipal Code, last amended by Ordinance 126855, is amended as follows:

23.84A.002 “A”

* * *

"Adult family home"((~~. See Residential use~~)) means the occupation of a dwelling unit by an adult family home defined and licensed as such by the State of Washington in chapter 70.128 RCW.

* * *

Section 44. Section 23.84A.006 of the Seattle Municipal Code, last amended by Ordinance 127099, is amended as follows:

23.84A.006 "C"

* * *

((~~"Carriage House” See "Residential use."~~

~~"Carriage House structure" See "Residential use".~~))

* * *

Section 45. Section 23.84A.008 of the Seattle Municipal Code, last amended by Ordinance 127099, is amended as follows:

23.84A.008 “D”

* * *

"Dwelling unit" means a room or rooms located within a structure that are configured to meet the standards of Section 23.42.048, ((~~and that are occupied or intended to be occupied by not more than one household as living accommodations independent from any other household.~~)) providing independent living facilities for one household, including permanent provisions for sleeping, food preparation, and sanitation.

"Dwelling unit, accessory((~~.~~))" ((~~See "Residential use."~~)) means a dwelling unit that:

a. is located within the same structure as a principal dwelling unit or within an accessory structure on the same lot as a principal dwelling unit; and

b. is designed, arranged, and intended to be occupied as living facilities independent from any dwelling unit.

((~~"Dwelling unit, detached accessory." Also known as a backyard cottage. See "detached accessory dwelling unit" under the definition of "Residential use" in Section 23.84A.032.~~))

"Dwelling unit, attached" means a dwelling unit that:

1. occupies space from the ground to the roof of the structure in which it is located; and

2. is attached to another dwelling unit. Dwelling units shall be considered attached if they share a common or party wall or have walls containing floor area that are located within 2 feet of each other.

"Dwelling unit, detached" means a dwelling unit that:

1. occupies space from the ground to the roof of the structure in which it is located; and

2. is not attached to any other dwelling unit.

"Dwelling unit, principal" means a dwelling unit that is not accessory to another dwelling unit.

"Dwelling unit, stacked" means dwelling units that are located above or below other dwelling units such as apartments or condominium buildings.

"Dwelling unit - small efficiency" means a dwelling unit with an amount of square footage less than the minimum amounts specified for Efficiency Dwelling Units in the Seattle Building Code, and that meet the standards prescribed in Section 23.42.048.

Section 46. Section 23.84A.010 of the Seattle Municipal Code, last amended by Ordinance 126685, is amended as follows:

23.84A.010 "E"

* * *

"Essential public facilities" within the City of Seattle means airports, sewage treatment plants, jails, light rail transit systems, and power plants.

"EV-ready" means a minimum 40-ampere dedicated 208- or 240-volt branch circuit (32-amp load) terminated at a junction box or receptacle outlet in close proximity to a parking space.

* * *

Section 47. Section 23.84A.024 of the Seattle Municipal Code, last amended by Ordinance 126855, is amended as follows:

23.84A.024 "L"

* * *

"Lot line, front" means, in the case of a lot with frontage on a single street, the lot line separating the lot from the street, and in the case of a lot with frontage on more than one street other than a through lot, the lot line separating the lot from any abutting street, provided the other lot line(s) that abut streets are considered to be either side street lot line(s) or the rear lot line according to the definitions of those terms. In the case of a through lot, the lot lines separating the lot from the streets that are parallel or within 15 degrees of parallel to each other are both front lines. For new development on a lot with no street frontage, the front lot line shall be the lot line designated by the project applicant in accordance with Section 23.86.010. If the area of the front yard based on a front lot line determined according to this definition is less than 20 percent of the total lot area and is less than 1,000 square feet in area, the Director may designate a different lot line as the front lot line or, in the case of a through lot, designate one of the front lots lines as a rear in order to provide structural setbacks, building separations, and open space that are more consistent with those of other lots that are ((~~within 100 feet~~)) in the vicinity of the property.

* * *

Section 48. Section 23.84A.025 of the Seattle Municipal Code, last amended by Ordinance 127099, is amended as follows:

23.84A.025 "M"

* * *

"Major retail store" means a structure or portion of a structure that provides adequate space of at least ((~~eighty thousand (~~))80,000((~~)~~)) square feet to accommodate the

merchandising needs of a major new retailer with an established reputation, and providing a range of merchandise and services, including both personal and household items, to anchor downtown shopping activity around the retail core, thereby supporting other retail uses and the area's vitality and regional draw for customers.

"Major transit stop" means:

1. Stops on a bus route operated by Sound Transit;

2. Commuter rail stops;

3. Stops on light rail, street car, or trolley bus systems;

4. Stops on bus rapid transit routes; and

5. Any future stop on a bus rapid transit route funded for development and projected for construction within an applicable six-year transit plan under RCW 35.58.2795.

* * *

Section 49. Section 23.84A.030 of the Seattle Municipal Code, last amended by Ordinance 127099, is amended as follows:

23.84A.030 "P"

"Permanent supportive housing" ((~~means low-income housing that is paired with on or off-site voluntary human services to support people living with complex and disabling behavioral health or physical health conditions and experiencing homelessness or at imminent risk of homelessness prior to moving into such housing.~~)) . See "Residential use, permanent supportive housing."

Section 50. Section 23.84A.032 of the Seattle Municipal Code, last amended by Ordinance 127099, is amended as follows:

23.84A.032 "R"

* * *

"Residential use" means ((~~any~~)) a use in one or more structures, including interior and exterior accessory spaces, in which people primarily live, in one or more of the following:

1. ((~~"Accessory dwelling unit" means one or more rooms that:~~

~~a. Are located within a principal dwelling unit or within an accessory structure on the same lot as a principal dwelling unit;~~

~~b. Meet the standards of Section 23.44.041, Section 23.45.545, or Chapter 23.47A, as applicable;~~

~~c. Are designed, arranged, and intended to be occupied by not more than one household as living accommodations independent from any other household; and~~

~~d. Are so occupied or vacant.~~

~~2. "Attached accessory dwelling unit" means an accessory dwelling unit that is within a principal dwelling unit.~~

~~3. "Adult family home" means an adult family home defined and licensed as such by the State of Washington in a dwelling unit.~~

~~4. "Apartment" means a multifamily residential use that is not a cottage housing development, rowhouse development, or townhouse development.~~

~~5.~~)) "Artist's studio/dwelling" means a residential uses with a combination working studio and dwelling unit for artists, consisting of a room or suite of rooms occupied by not more than one household.

((~~6~~)) 2. "Assisted living facility" means a residential use licensed by the State of Washington as a boarding home that contains at least two assisted living units for people who have either a need for assistance with activities of daily living (which are defined as eating, toileting, ambulation, transfer (e.g., moving from bed to chair or chair to bath), and bathing) or some form of cognitive impairment but who do not need the skilled critical care provided by nursing homes. See "Assisted living unit."

((~~7. "Carriage house" means a dwelling unit in a carriage house structure.~~

~~8. "Carriage house structure" means a structure within a cottage housing development, in which one or more dwelling units are located on the story above an enclosed parking garage at ground level that either abuts an alley and has vehicle access from that alley, or is located on a corner lot and has access to the parking in the structure from a driveway that abuts and runs parallel to the rear lot line of the lot. See also "Carriage house."~~))

((~~9~~)) 3. "Caretaker's quarters" means a residential use accessory to a ((~~non-residential~~)) nonresidential use consisting of a dwelling unit not exceeding 800 square feet of living area and occupied by a caretaker or watchperson.

((~~10~~)) 4. "Congregate residence" means a residential use in which sleeping rooms are independently rented and lockable and provide living and sleeping space, and residents share kitchen facilities and other common elements with other residents in a building.

((~~11. "Cottage housing development" means a use consisting of cottages arranged on at least two sides of a common open space or a common amenity area. A cottage housing development may include a carriage house structure. See "Cottage," "Carriage house," and "Carriage house structure."~~

~~12. "Detached accessory dwelling unit" means an accessory dwelling unit in an accessory structure.~~

~~13. "Domestic violence shelter" means a structure or portion of a structure managed by a nonprofit organization, which unit provides housing at a confidential location and support services for victims of domestic violence.~~

~~14. "Floating home" means a dwelling unit constructed on a float that is moored, anchored, or otherwise secured in the water.~~

~~15. "Low-income housing."~~))

5. “Housing” means all other residential uses where individual dwelling units are provided, whether in detached or attached structures.

((~~16~~)) 7. "Mobile home" means a structure that is designed and constructed to be transportable in one or more sections and built on a permanent chassis, designed to be used as a dwelling unit without a permanent foundation, and connected to utilities that include plumbing, heating, and electrical systems. A structure that was transportable at the time of manufacture is still considered to meet this definition notwithstanding that it is no longer transportable.

((~~17. "Mobile home park" means a tract of land that is rented for the use of more than one mobile home occupied as a dwelling unit.~~

~~18. "Multifamily residential use" means a use consisting of two or more dwelling units in a structure or portion of a structure, excluding accessory dwelling units, or a congregate residence.~~

~~19. "Nursing home" means a use licensed by the State of Washington as a nursing home, that provides full-time convalescent and/or chronic care for individuals who, by reason of chronic illness or infirmity, are unable to care for themselves, but that does not provide care for the acutely ill or surgical or obstetrical services. This definition excludes hospitals or sanitariums.~~))

((~~20~~)) 8. "Permanent supportive housing((~~.~~))" means a residential use where low-income housing is paired with on or off-site voluntary human services to support people living with complex and disabling behavioral health or physical health conditions and experiencing homelessness or at imminent risk of homelessness prior to moving into such housing.

((~~21. "Rowhouse development" means a multifamily residential use in which all principal dwelling units on the lot meet the following conditions:~~

~~a. Each dwelling unit occupies the space from the ground to the roof of the structure in which it is located;~~

~~b. No portion of a dwelling unit, except for an accessory dwelling unit or shared parking garage, occupies space above or below another dwelling unit;~~

~~c. Each dwelling unit is attached along at least one common wall to at least one other dwelling unit, with habitable interior space on both sides of the common wall, or abuts another dwelling unit on a common lot line;~~

~~d. The front of each dwelling unit faces a street lot line;~~

~~e. Each dwelling unit provides pedestrian access directly to the street that it faces; and~~

~~f. No portion of any other dwelling unit, except for an attached accessory dwelling unit, is located between any dwelling unit and the street faced by the front of that unit.~~

~~22. "Single-family dwelling unit" means a detached principal structure having a permanent foundation, containing one dwelling unit, except that the structure may also contain one or two attached accessory dwelling units where expressly authorized pursuant to this Title 23. A detached accessory dwelling unit is not considered a single-family dwelling unit for purposes of this Chapter 23.84A.~~

~~23. "Townhouse development" means a multifamily residential use that is not a rowhouse development, and in which:~~

~~a. Each dwelling unit occupies space from the ground to the roof of the structure in which it is located;~~

~~b. No portion of a dwelling unit occupies space above or below another dwelling unit, except for an attached accessory dwelling unit and except for dwelling units constructed over a shared parking garage, including shared parking garages that project up to 4 feet above grade; and~~

~~c. Each dwelling unit is attached along at least one common wall to at least one other dwelling unit, with habitable interior space on both sides of the common wall, or abuts another dwelling unit on a common lot line.~~))

* * *

Section 51. Section 23.84A.036 of the Seattle Municipal Code, last amended by Ordinance 126157, is amended as follows:

23.84A.036 "S"

* * *

"Short subdivision" means the division or redivision of land into nine (((~~9~~))) or fewer lots, tracts, parcels, sites, or divisions for the purpose of sale, lease, development, or financing.

"Short subdivision, zero lot line" means a short subdivision that conforms to the unit lot subdivision standards in Section 23.24.045.

* * *

"Solar collector" means ((~~any~~)) a device used to collect direct sunlight for use in the heating or cooling of a structure, domestic hot water, ((~~or~~)) swimming pool, or the generation of electricity, including photovoltaic panels and solar thermal panels.

((~~"Solar greenhouse" means a solar collector that is a structure or portion of a structure utilizing glass or similar glazing material to collect direct sunlight for space heating purposes.~~))

* * *

"Structure, accessory." See "Accessory structure."

“Structure, attached” means a structure that shares a common or party wall with another structure or has a wall containing floor area that is located within 2 feet of a wall containing floor area of another structure.

"Structure, detached " means a structure ((~~having no common or party wall with another structure~~)) that is not attached to any other dwelling unit.

* * *

"Subdivision" means the division or redivision of land into ten (((~~10~~))) or more lots, tracts, parcels, sites, or divisions for the purpose of sale, lease, or transfer of ownership.

“Subdivision, zero lot line” means a subdivision that conforms to the unit lot subdivision standards in Section 23.22.062.

* * *

Section 52. Section 23.84A.048 of the Seattle Municipal Code, last amended by Ordinance 126685, is amended as follows:

23.84A.048 “Z”

* * *

((~~"Zone, neighborhood residential" means a zone with a classification that includes any of the following: NR1, NR2, NR3, and RSL~~)).

* * *

"Zone, residential" means a zone with a classification that includes any of the following: NR((~~1, NR2, NR3, RSL~~)), LR1, LR2, LR3, MR, HR, RC, DMR, IDR, SM/R, SM-SLU/R, and SM-U/R which classification also may include one or more suffixes, but not including any zone with an RC designation.

((~~"Zone, single-family" means a neighborhood residential zone with a classification that includes any of the following: Neighborhood Residential 1 (NR1), Neighborhood Residential 2 (NR2), Neighborhood Residential 3 (NR3), and Residential Small Lot (RSL)~~)).

Changes to Measurements

Section 53. Section 23.86.002 of the Seattle Municipal Code, last amended by Ordinance 125791, is amended as follows:

23.86.002 General provisions

Note: This section is being updated to reflect that RSL zones have been deleted and that density limits have been implemented in NR zones.

A. For all calculations, the applicant shall be responsible for supplying drawings illustrating the measurements. These drawings shall be drawn to scale, and shall be of sufficient detail to allow verification upon inspection or examination by the Director.

B. Fractions

1. Unless otherwise indicated, if any measurement technique for determining the number of items required or allowed, including but not limited to motor vehicle parking, or required trees or shrubs, results in fractional requirements, any fraction up to and including 0.5 of the applicable unit of measurement shall be disregarded and fractions over 0.5 shall require the next higher full unit of measurement.

2. If any measurement technique for determining required minimum or allowed maximum dimensions, including but not limited to height, yards, setbacks, lot coverage, open space, building depth, parking space size, or curb cut width, results in fractional requirements, the dimension shall be measured to the nearest inch. Any fraction up to and including 0.5 of an inch shall be disregarded and fractions over 0.5 of an inch shall require the next higher unit.

3.Except within Lowrise and ((~~RSL~~)) NR zones, if density calculations result in a fraction of a unit, any fraction up to and including 0.5 constitutes zero additional units, and any fraction over 0.5 constitutes one additional unit. Within Lowrise zones, the effect of a density calculation that results in a fraction of a unit is as described in Section 23.45.512. Within ((~~RSL~~)) NR zones, the effect of a density calculation that results in a fraction of a unit is as described in Section 23.44.017. This provision may not be applied to density calculations that result in a quotient less than one.

C. Where the location of a lot line varies depending on elevation, such as partial right-of-way vacations and dedications that include below-grade areas but exclude the area at ground level, development standards that rely on lot lines shall be based on the location of lot lines at grade.

Section 54. Section 23.86.006 of the Seattle Municipal Code, last amended by Ordinance 126685, is amended as follows:

23.86.006 Structure height measurement

Note: This section would be updated as height averaging is proposed to be removed from NR zones.

* * *

B. Within the South Lake Union Urban Center, at the applicant's option, structure height shall be measured either as provided for in subsection 23.86.006.A, ((~~23.86.006.E~~)) 23.86.006.D, or under provisions of this subsection 23.86.006.B. Structure height shall be measured for all portions of the structure. All measurements shall be taken vertically from existing or finished grade, whichever is lower, to the highest point of the structure located directly above each point of measurement. Existing or finished grade shall be established by drawing straight lines between the corresponding elevations at the perimeter of the structure. The straight lines will be existing or finished grade for the purpose of height measurement. When a contour line crosses a facade more than once, that contour line will be disregarded when establishing existing or finished grade.

C. ((~~Height averaging for neighborhood residential zones. In a neighborhood residential zone, when expanding an existing structure occupied by a nonconforming residential use per Section 23.42.106, the following measurement shall be used to determine the average height of the closest principal structures on either side:~~

~~1. Each structure used for averaging shall be on the same block front as the lot for which a height limit is being established. The structures used shall be the nearest single-family structure on each side of the lot, and shall be within 100 feet of the side lot lines of the lot.~~

~~2. The height limit for the lot shall be established by averaging the elevations of the structures on either side in the following manner:~~

~~a. If the nearest structure on either side has a roof with at least a 4:12 pitch, the elevation to be used for averaging shall be the highest point of that structure's roof minus 5 feet.~~

~~b. If the nearest structure on either side has a flat roof, or a roof with a pitch of less than 4:12, the elevation of the highest point of the structure's roof shall be used for averaging.~~

~~c. Rooftop features which are otherwise exempt from height limitations according to subsection 23.44.012.C, shall not be included in elevation calculations.~~

~~d. The two elevations obtained from subsection 23.86.006.B.2.a and/or subsection 23.86.006.B.2.b shall be averaged to derive the height limit for the lot. This height limit shall be the difference in elevation between the midpoint of a line parallel to the front lot line at the required front setback and the average elevation derived from subsection 23.86.006.B.2.a and/or subsection 23.86.006.B.2.b.~~

~~e. The height measurement technique used for the lot shall then be the City's standard measurement technique, subsection 23.86.006.A.~~

~~3. If there is no single-family structure within 100 feet of a side lot line, or if the nearest single-family structure within 100 feet of a side lot line is not on the same block front, the elevation used for averaging on that side shall be 30 feet plus the elevation of the midpoint of the front lot line of the abutting vacant lot.~~

~~4. If the lot is a corner lot, the height limit may be the highest elevation of the nearest structure on the same block front, provided that the structure is within 100 feet of the side lot line of the lot and that both front yards face the same street.~~

~~5. In no case shall the height limit established according to these height averaging provisions be greater than 40 feet.~~

~~6. Lots using height averaging to establish a height limit shall be eligible for the pitched roof provisions of subsection 23.44.012.B.~~

~~D.~~)) Stories or portions of stories of a structure that are underground are not analyzed for purposes of structure height measurement.

((~~E~~)) D. Height measurement techniques in downtown zones and in the South Lake Union Urban Center

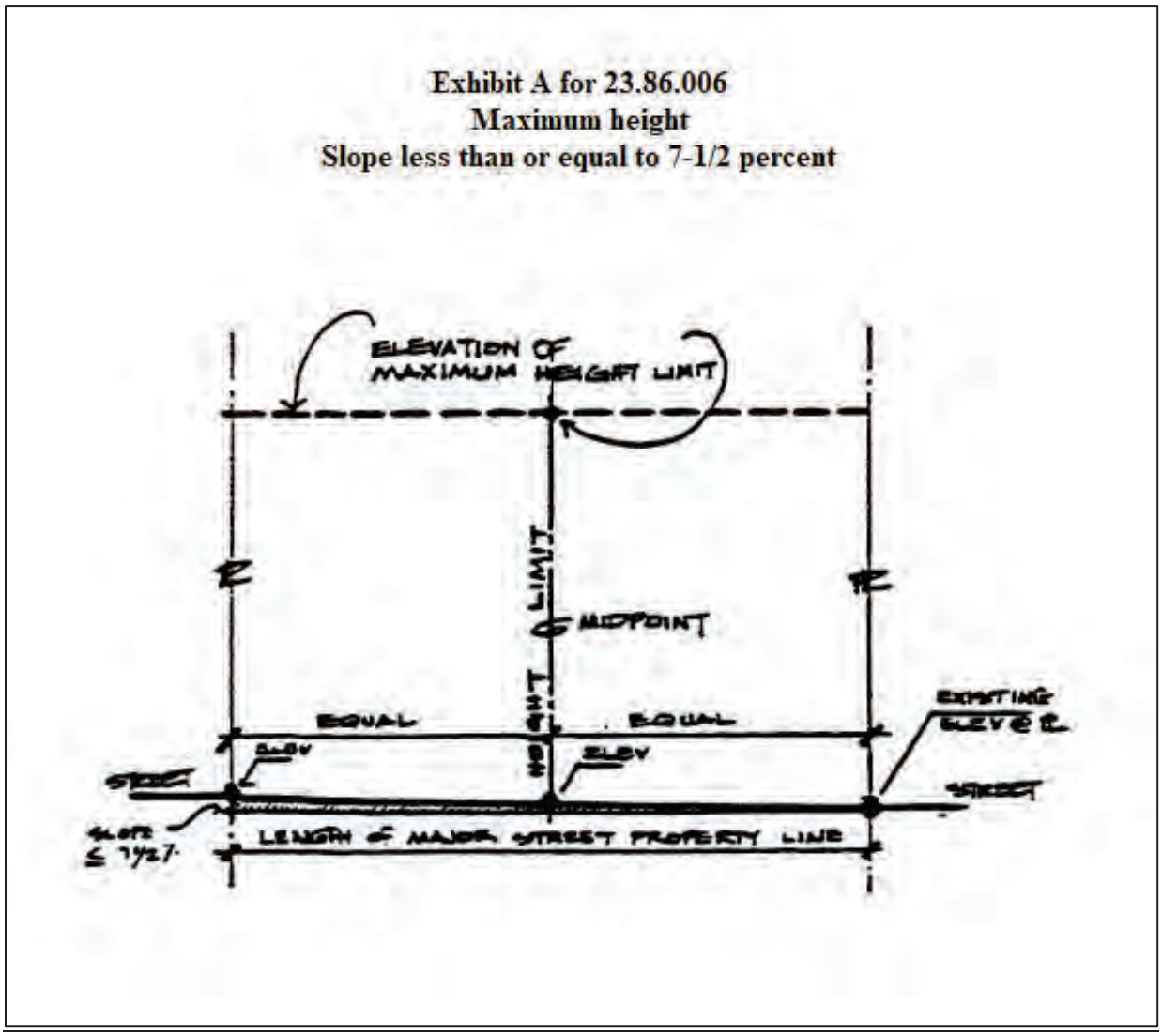
1. Determine the major street lot line, which shall be the lot's longest street lot line. When the lot has two or more street lot lines of equal length, the applicant shall choose the major street lot line.

2. Determine the slope of the lot along the entire length of the major street lot line.

3. The maximum height shall be measured as follows:

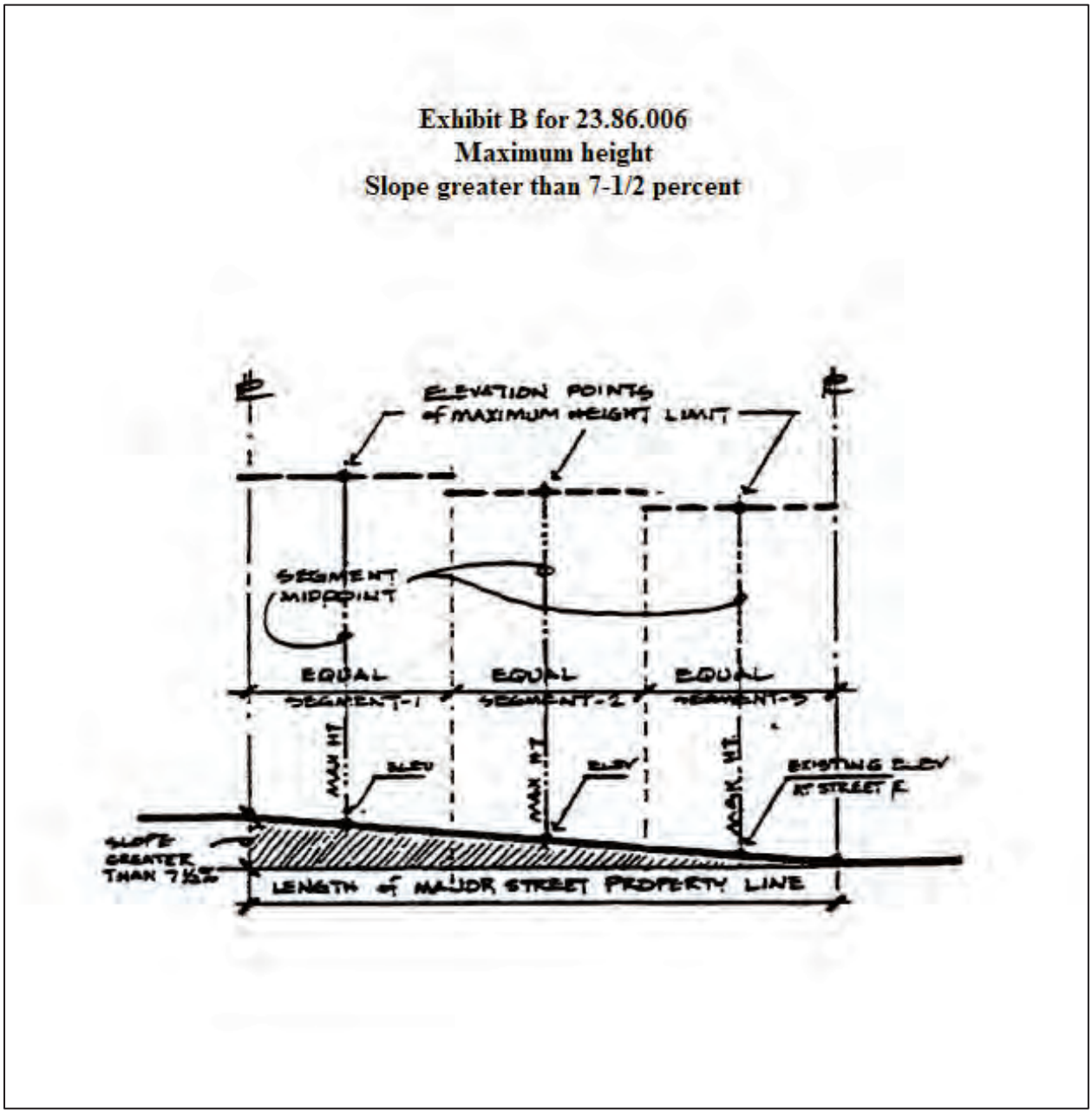
a. When the slope of the major street lot line is less than or equal to 7.5 percent, the elevation of maximum height shall be determined by adding the maximum permitted height to the existing grade elevation at the midpoint of the major street lot line. On a through-lot, the elevation of maximum height shall apply only to the half of the lot nearest the major street lot line. On the other half of a through-lot, the elevation of maximum height shall be determined by the above method using the street lot line opposite and parallel to the major street lot line as depicted in Exhibit ((~~B~~)) A for 23.86.006.

Exhibit A for 23.86.006
Maximum Height
Slope Less than or equal to 7-1/2 percent



b. When the slope of the major street lot line exceeds 7.5 percent, the major street lot line shall be divided into four or fewer equal segments no longer than 120 feet in length. The elevation of maximum height shall be determined by adding the maximum permitted height to the existing grade elevation at the midpoint of each segment. On a through-lot, the elevation of maximum height shall apply only to the half of the lot nearest the major street lot line. On the other half of a through-lot, the elevation of maximum height shall be determined by the above method using the street lot line opposite and parallel to the major street lot line, as depicted in Exhibit ((~~C~~)) B for 23.86.006.

Exhibit B for 23.86.006
Maximum height
Slope greater than 7-1/2 percent



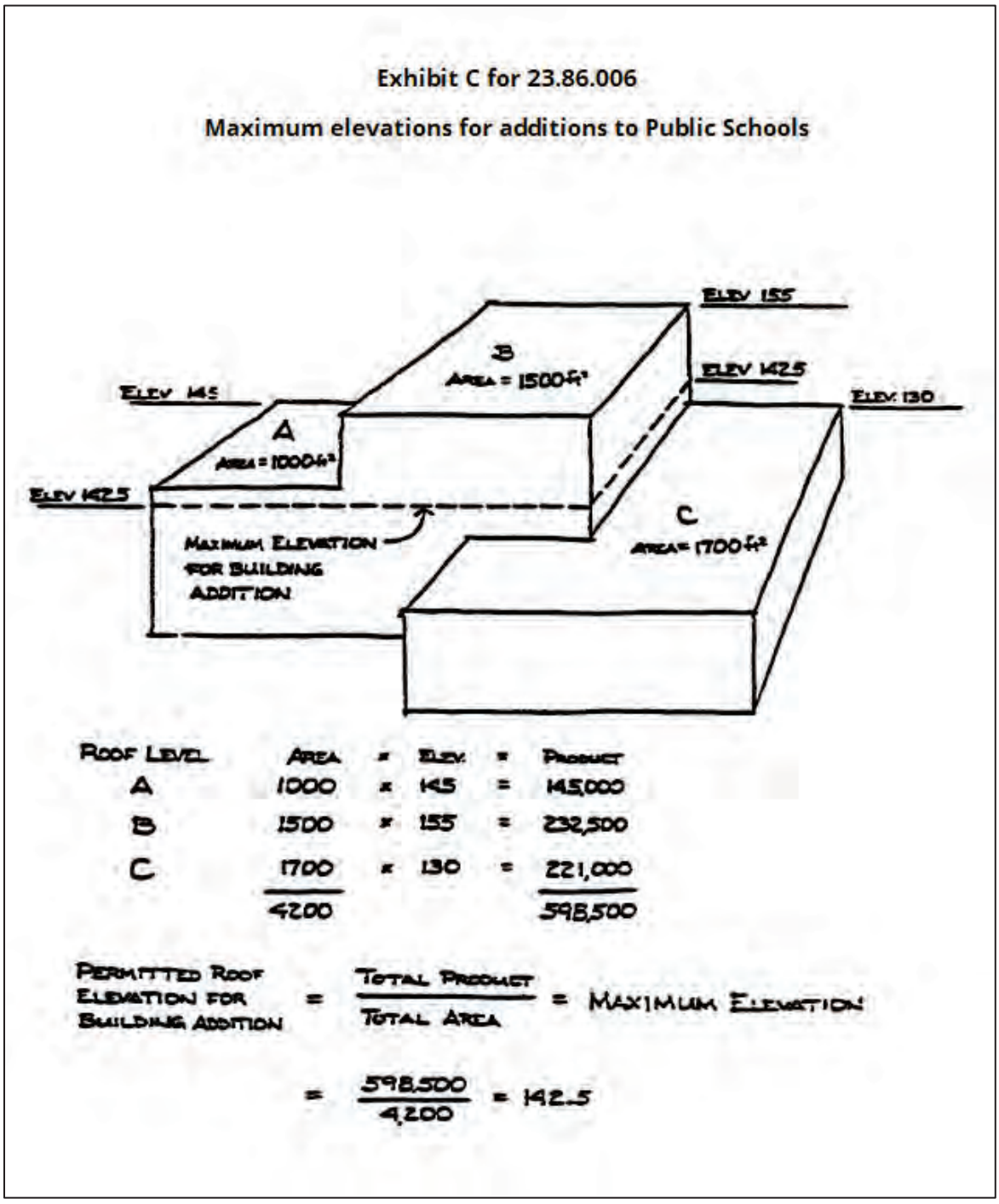
c. For lots with more than one street frontage, where there is no street lot line that is essentially parallel to the major street lot line, when a measurement has been made for the portion of the block containing the major street lot line, the next measurement shall be taken from the remaining street lot line that is opposite and most distant from the major street lot line.

((~~F~~)) E. Determining the height of existing public school structures. When the height of the existing public school structure is measured for purposes of determining the permitted height or lot coverage of a public school structure, either of the following measurement methods may be used:

1. If all parts of the new roof are pitched at a rate of not less than 4:12, the ridge of the new roof may extend to the highest point of the existing roof. A shed roof does not qualify for this option; or

2. If all parts of the new roof are not pitched at a rate of not less than 4:12, then the elevation of the new construction may extend to the average height of the existing structure. The average height shall be determined by measuring the area of each portion of the building at each height and averaging those areas, as depicted in Exhibit ((~~D~~)) C for 23.86.006.

Exhibit C for 23.86.006
Maximum elevations for additions to Public Schools



((~~G~~)) F. Height measurement technique for structures located partially within the Shoreline District. When any portion of the structure falls within the Shoreline District,

structure height for the entire structure shall be measured according to Section 23.60A.952, Height.

((~~H~~)) G. For projects accepted into the Living Building Pilot Program authorized pursuant to Section 23.40.060, the applicant may choose either the height definition of Chapter 2 of the Seattle Building Code or the height measurement method described in this Section 23.86.006.

Exhibit 23.86.006 B
Maximum Height. Slope Less Than or Equal to 7½%

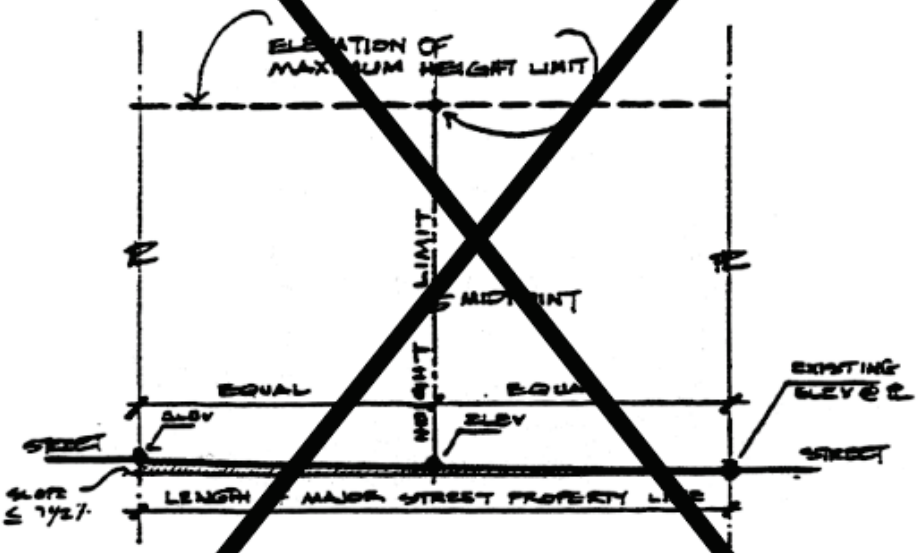


Exhibit 23.86.006 C
Maximum Height, Slope Greater Than 7-½%

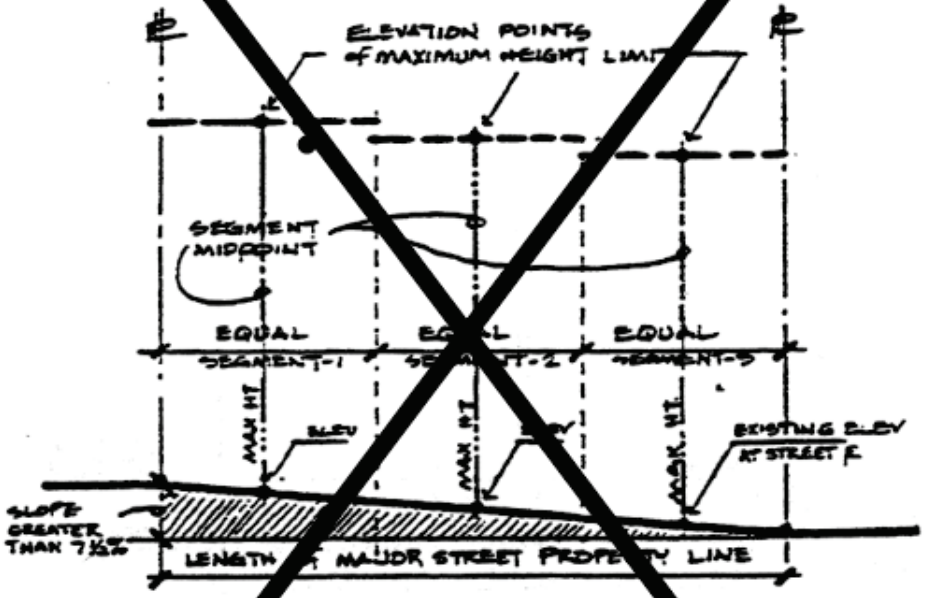
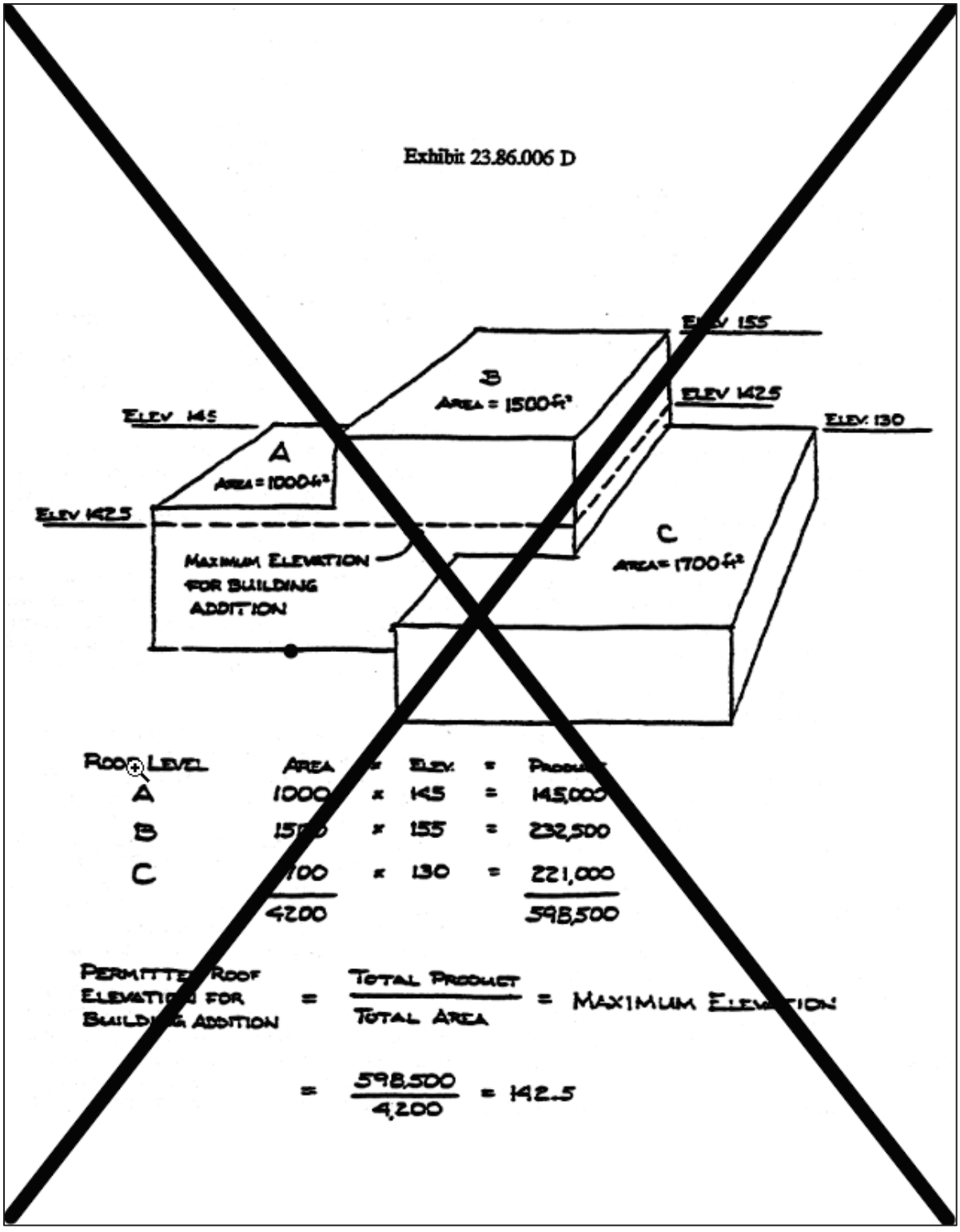


Exhibit 23.86.006 D



ROOF LEVEL	AREA	×	ELEV.	=	PRODUCT
A	1000	×	145	=	145,000
B	1500	×	155	=	232,500
C	1700	×	130	=	221,000
	4200				598,500

PERMITTED ROOF ELEVATION FOR BUILDING ADDITION = $\frac{\text{TOTAL PRODUCT}}{\text{TOTAL AREA}}$ = MAXIMUM ELEVATION

$= \frac{598,500}{4,200} = 142.5$

Section 55. Section 23.86.008 of the Seattle Municipal Code, last amended by Ordinance 126509, is amended as follows:

23.86.008 Lot ((~~coverage,~~)) width ((~~and depth.~~)) in Neighborhood Residential zones

Note: This section is proposed to be updated to simply the explanation and remove outdate lot coverage calculations.

((~~A. Lot coverage shall be calculated in accordance with Exhibit 23.86.008 A.~~

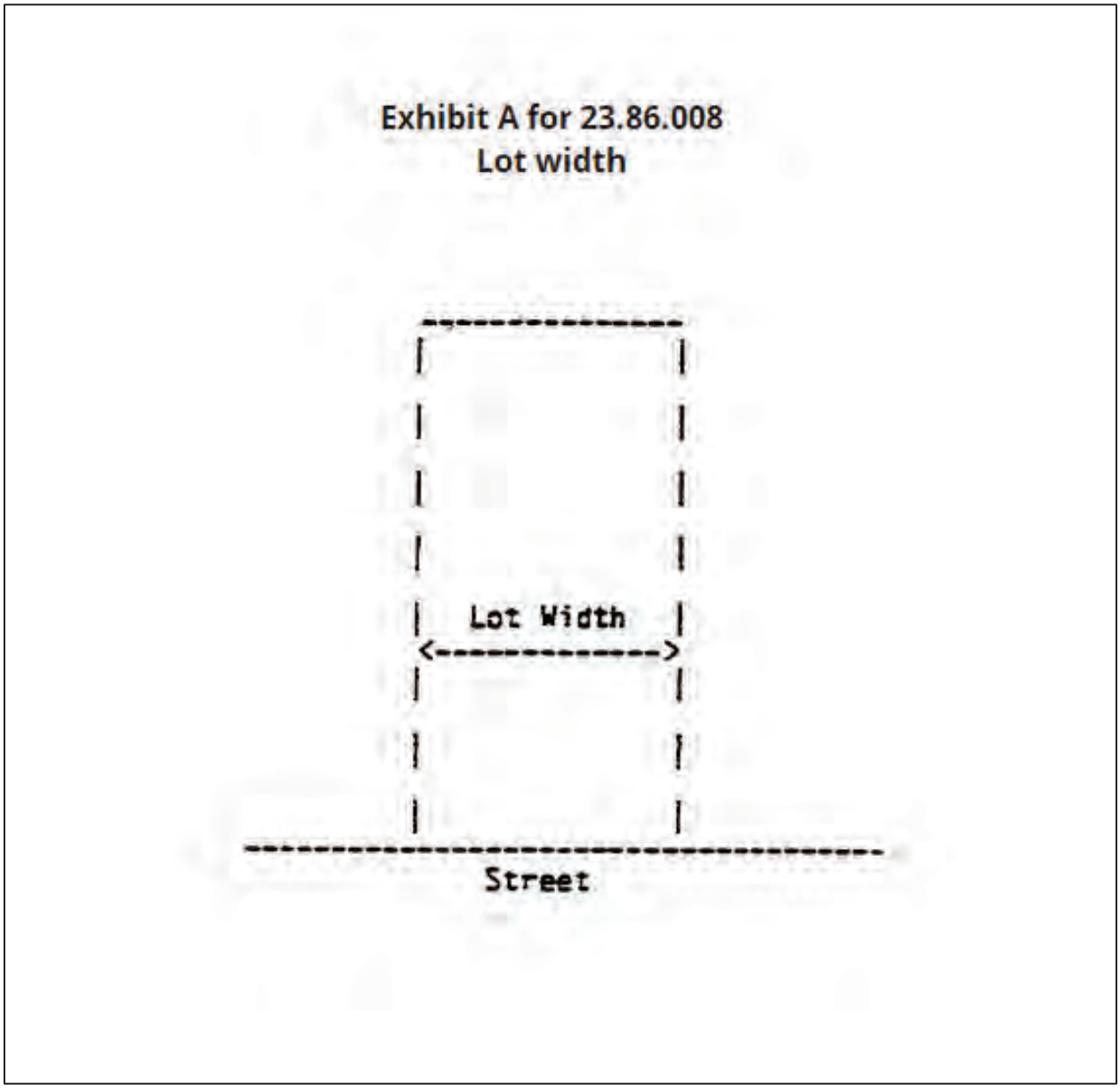
~~B. In neighborhood residential zones, lot depth shall be the length of the line extending between the front lot line or front lot line extended, and the rear lot line or lines, or in the case of a through lot, between the two (2) front lot lines or lines extended. This line shall be perpendicular to the front lot line or front lot line extended. Where an alley abuts the rear of the property, one-half (½) of the width of the alley shall be included as a portion of the lot for determining lot depth.~~

~~C. Lot Width in Neighborhood Residential Zones:~~))

((~~1~~)) A. When a lot is essentially rectangular, the lot width shall be the mean horizontal distance between side lot lines measured at right angles to lot depth (((~~Exhibit 23.86.008 B~~))) Exhibit A for 23.86.008.

Exhibit A for 23.86.008

Lot width



((~~2~~)) B. In the case of a lot with more than one ((~~(1)~~)) rear lot line (((~~Exhibits 23.86.008 C and 23.86.008 D~~))) Exhibit B for 23.86.008 and Exhibit C for 23.86.008, the lot width shall be measured according to the following:

Exhibit B for 23.86.008

Lots with more than one rear lot line,

and where the distance between the rear

lot line is less than 50 percent of lot depth

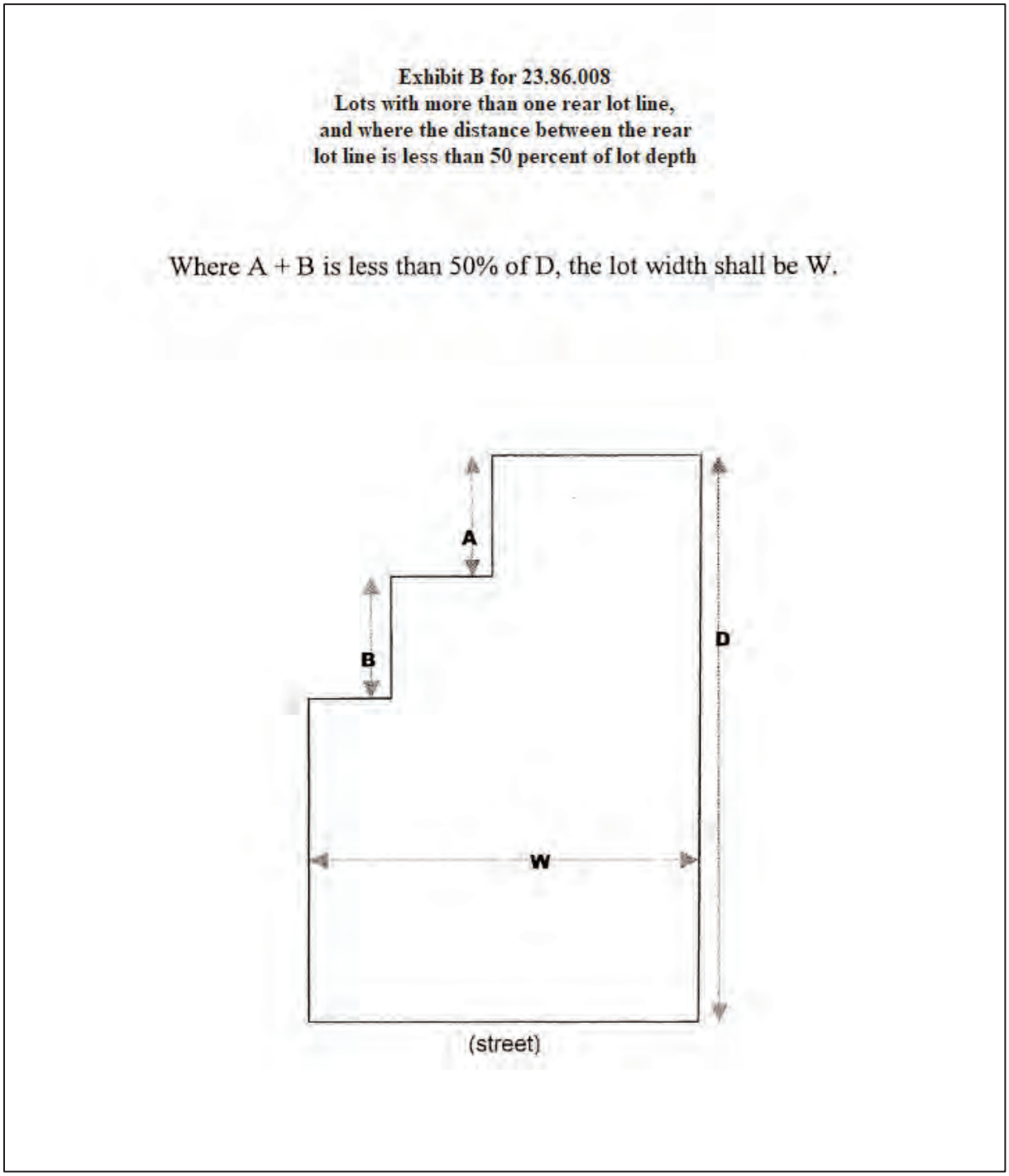
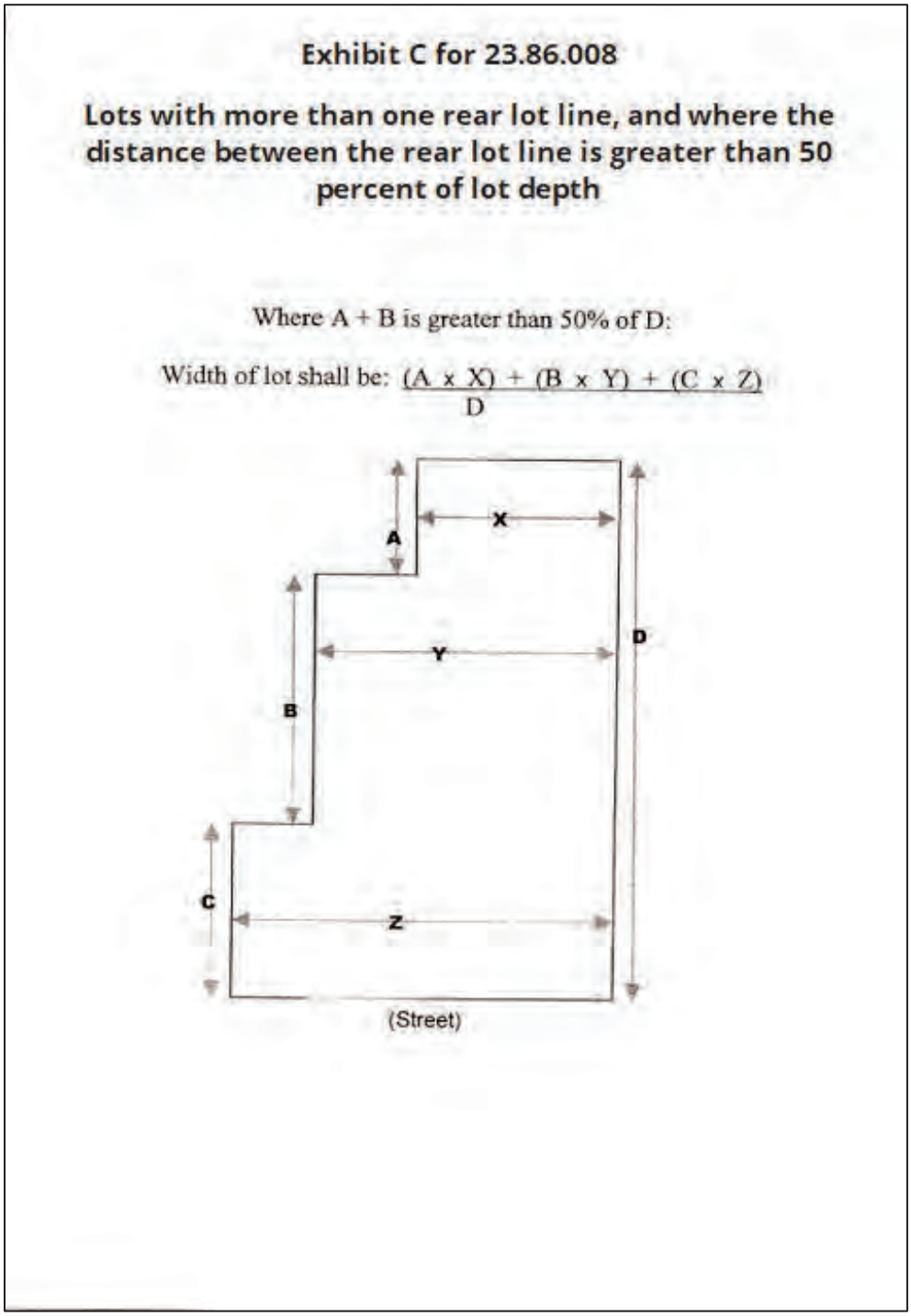


Exhibit C for 23.86.008

Lots with more than one rear lot line, and where the distance between the rear lot line is greater than 50 percent of lot depth

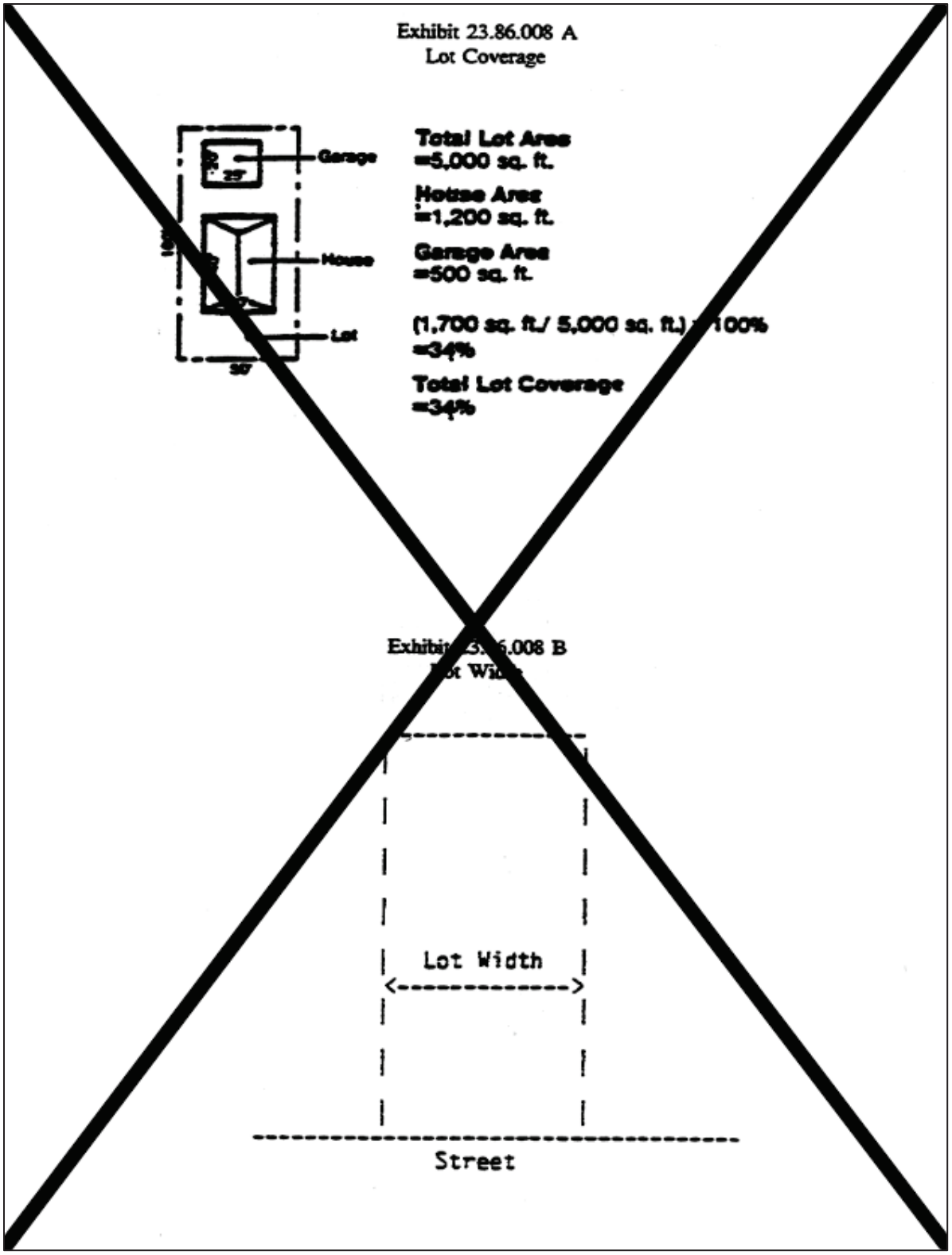


((~~a~~)) 1. If the distance between the rear lot lines is ((~~fifty (~~))50((~~)~~)) percent or less of the lot depth, the lot width shall be measured parallel to the front lot

line and shall be the greatest distance between the side lot lines ((~~(Exhibit 23.86.008 C)~~)) Exhibit B for 23.86.008; or

((~~b~~)) 2. If the distance between the rear lot lines is greater than ((~~fifty~~ ~~(~~))50((~~)~~)) percent of the lot depth, the lot width shall be determined by measuring average lot width according to ((~~Exhibit 23.86.008 D~~)) Exhibit C for 23.86.008.

((~~3~~)) C. For irregular lots not meeting the conditions of subsections ((~~C1 or C2~~)) 23.86.008.A or 23.86.008.B, the Director shall determine the measurement of lot width.



((~~Exhibits 23.86.008A, 23.86.008B~~))

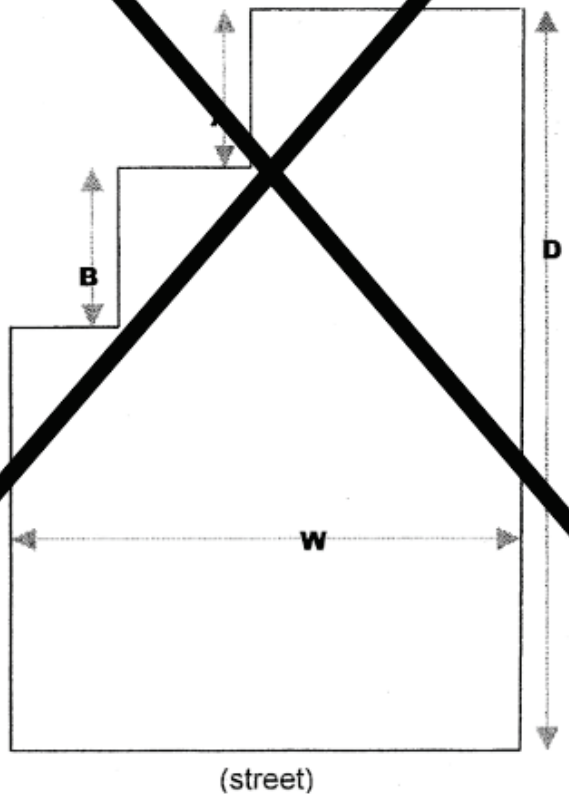
Exhibit 23.86.008 C

Lots With More Than One Rear Lot Line,

And Where The Distance Between The Rear

Lot Line Is Less Than 50% Of Lot Depth

Where A + B is less than 50% of D, the lot width shall be W.



((~~Exhibit 23.86.008C~~))

Exhibit 23.86.008 D

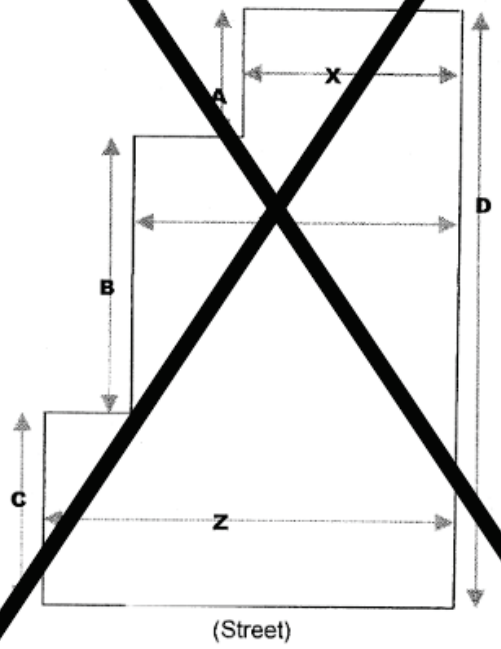
Lots with More Than One Rear Lot Line, And Where

The Distance Between the Rear Lot Line

Is Greater than 50% Of Lot Depth

Where A + B is greater than 50% of D

Width of lot shall be: $\frac{(A \times X) + (B \times Y) + (C \times Z)}{D}$



Section 56. Section 23.86.010 of the Seattle Municipal Code, last amended by Ordinance 126509, is repealed:

((~~23.86.010 Yards~~

Note: This section is proposed to be removed as Neighborhood Residential zones would use the term setbacks rather than yards, consistent with other zones. All other zones use setback regulations.

~~A. Measuring required yards. Required yard dimensions shall be horizontal distances, measured perpendicular to the appropriate lot lines (Exhibit A for 23.86.010). For lots with no street frontage, the applicant may designate the front lot line, provided that under the resulting orientation, the area of the front yard is at least 20 percent of the area of the lot or 1,000 square feet whichever is less. If a lot with frontage on more than one street is developed with an existing principal structure, the orientation of the lot for the purpose of current yard requirements shall be the orientation under which the existing structure is most conforming to current yard standards.~~

~~B. Front Yards.~~

~~1. Determining Front Yard Requirements. Front yard requirements are presented in the development standards for each zone. Where the minimum required front yard is to be determined by averaging the setbacks of structures on either side of a lot, the following provisions apply:~~

~~a. The required depth of the front yard shall be the average of the distance between single-family structures and front lot lines of the nearest single-family structures on each side of the lot (Exhibit B for 23.86.010). If the front facade of the single-family structure is not parallel to the front lot line, the shortest distance from the front lot line to the structure shall be used for averaging purposes (Exhibit C for 23.86.010).~~

~~b. The yards used for front yard averaging shall be on the same block front as the lot, and shall be the front yards of the nearest single-family structures within 100 feet of the side lot lines of the lot.~~

~~c. For averaging purposes, front yard depth shall be measured from the front lot lines to the wall nearest to the street or, where there is no wall, the plane between supports, which comprises 20 percent or more of the width of the front facade of the single-family structure. Enclosed porches shall be considered part of the single-family structure for measurement purposes. Attached garages or carports permitted in front yards under 23.44.016.D, decks, uncovered porches, eaves, attached solar collectors, and other similar parts of the structure shall not be considered part of the structure for measurement purposes.~~

d. If there is a dedication of street right-of-way to bring the street abutting the lot closer to the minimum widths established in Section 23.53.015, for averaging purposes the amount of the dedication shall be subtracted from the front yard depth of the structures on either side.

e. If the first single-family structure within 100 feet of a side lot line of the lot is not on the same block front, or does not provide its front yard on the same street, or if there is no single-family structure within 100 feet of the side lot line, the yard depth used for averaging purposes on that side shall be 20 feet (Exhibits D and E for 23.86.010).

f. If the front yard of the first single-family structure within 100 feet of the side lot line of the lot exceeds 20 feet, the yard depth used for averaging purposes on that side shall be 20 feet (Exhibit F for 23.86.010).

g. In cases where the street is very steep or winding, the Director shall determine which adjacent single-family structures should be used for averaging purposes.

2. Sloped Lots in Neighborhood Residential Zones. For a lot in a neighborhood residential zone, reduction of the required front yard is permitted at a rate of 1 foot for every percent of slope in excess of 35 percent. For the purpose of this provision the slope shall be measured along the centerline of the lot. In the case of irregularly shaped lots, the Director shall determine the line along which slope is calculated.

C. Rear yards. Rear yard requirements are presented in the standard development requirements for each zone. In determining how to apply these requirements, the following provisions shall apply:

1. The rear yard shall be measured horizontally from the rear lot line if the lot has a rear lot line that is essentially parallel to the front lot line for its entire length.

2. If the front lot line is essentially parallel to portions of the rear property line, as with a stepped rear property line, each portion of the rear property line that is opposite and essentially parallel to the front lot line is considered to be a rear lot line for the purpose of establishing a rear yard.

3. On a lot with a rear property line, part of which is not essentially parallel to any part of the front lot line, the rear yard is measured from a line or lines drawn from side lot line(s) to side lot line(s), at least 10 feet in length, parallel to and at a maximum distance from the front lot line. If an alley abuts the rear of the property, 1/2 the width of the alley, between the side lot lines extended, is considered to be part of the lot for

drawing this line. For those portions of the rear lot line that are essentially parallel to the front lot line, subsection 23.86.010.C.2 above shall apply. The lot depth is then measured perpendicularly from this 10 foot long line extended as needed to the point on the actual front lot line that is the furthest distance away. This establishes lot depth, which then may be used to determine the required rear yard depth.

4. For a lot with a curved front lot line, the rear yard is measured from a line at least 10 feet in length, parallel to and at a maximum distance from a line drawn between the endpoints of the curve. The lot depth is then measured perpendicularly from this 10 foot long line extended as needed to the point on the actual front lot line that is the furthest distance away. This establishes lot depth, which then may be used to determine the required rear yard depth.

5. For a lot with an irregular shape or with an irregular front lot line not meeting conditions of subsections 23.86.010.C.1 through 23.86.010.C.4, the Director shall determine the measurement of the rear yard.

D. Side Yards.

1. Side Yard Averaging. Side yard requirements are presented in the standard development requirements for each zone. In certain cases where specifically permitted, the side yard requirement may be satisfied by averaging the distance from side lot line to structure facade for the length of the structure. In those cases the side yard shall be measured horizontally from side lot line to the side facade of the structure.

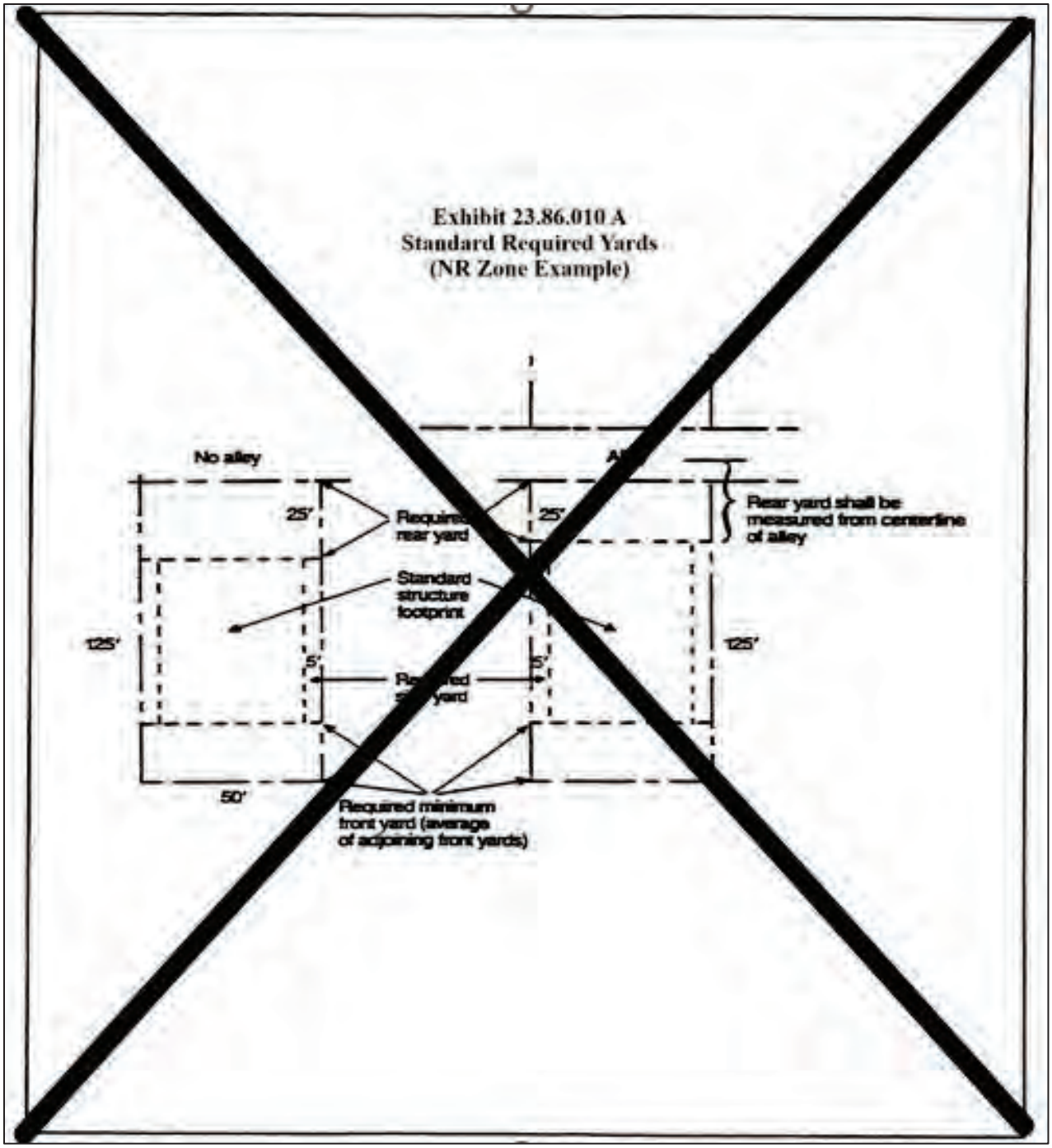
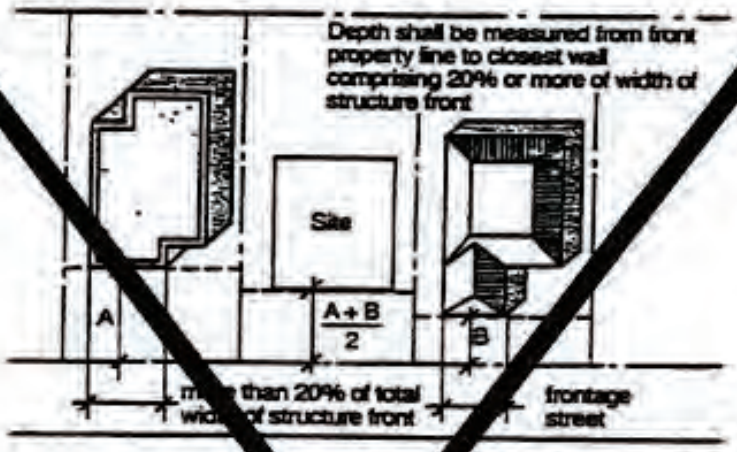
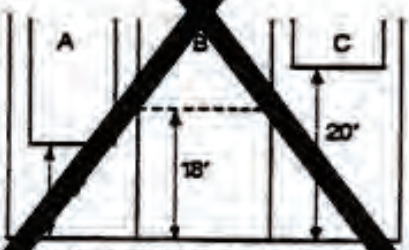


Exhibit 23.86.010 A
Standard Required Yards
(NR Zone Example)
No alley
25'
Required rear yard
25'
Rear yard shall be measured from centerline of alley
Standard structure footprint
125'
125'
5'
5'
50'
Required minimum front yard (average of adjoining front yards)

Exhibit B for 23.86.010

Determination of Front Yard Setback



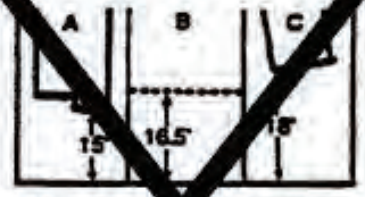


Required minimum front setback for Lot B determined as follows:

1. Front setback, Lot A = 16'.
2. Front setback, Lot C = 20'.
3. Average front setback = 18'.
4. Required minimum front setback for Lot B = 18'.

Exhibit C for 23.86.010

Calculating Minimum Required Front Yard
Unusual Front Walls



Minimum required front yard for Lot B:

1. Front yard, Lot A = 15'.
2. Front yard, Lot C = 18'.
3. Average front yard = 16.5'.
4. Required minimum front yard for lot B = 16.5'

Exhibit D for 23.86.010

1. Front yard, Lot D = 16'.
2. Lot B unimproved.
3. Lot A not on same block front.
4. Use 20' for averaging purposes on west sid
5. Minimum required front yard.
   Lot C = (20 + 16)/2 = 18'.

Exhibit E for 23.86.010

Minimum Required Front Yards, Adjoining Lots Unimproved

1. Front yard, Lot F = 18'.
2. Lots B, C, D unimproved.
3. Use 20' for averaging purposes on west side.
4. Minimum required front yard,
   Lot E = (20 + 18)/2 = 19'.

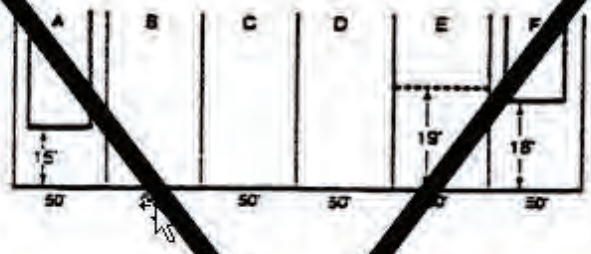
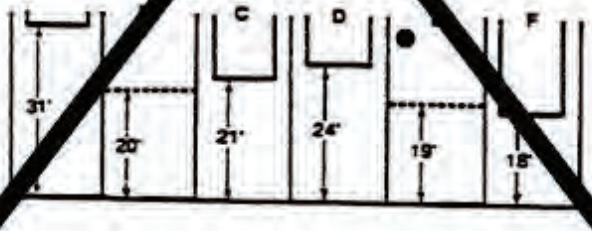


Exhibit F for 23.86.010

1. Minimum required front yard,
   Lot B = (20 + 20)/2 = 20'.
2. Minimum required front yard,
   Lot E = (20 + 18)/2 = 19'



Section 57. Section 23.86.012 of the Seattle Municipal Code, last amended by Ordinance 125791, is amended as follows:

23.86.012 ((~~Multifamily and commercial zone setback~~)) Setback measurement

Note: This section is being updated to add standards for setback measurement that are currently contained in a Director's Rule and to remove subsection C which contains a measurement technique for an approach that was removed in previous legislation.

A. For purposes of setback standards, measurement shall be taken to the outside of building foundations and exterior walls rather than to exterior finishing provided that exterior finishes extend more than 6 inches into a required setback.

((~~A~~)) B. Setback averaging. In multifamily and commercial zones, certain required setbacks may be averaged. In such cases the following provisions apply:

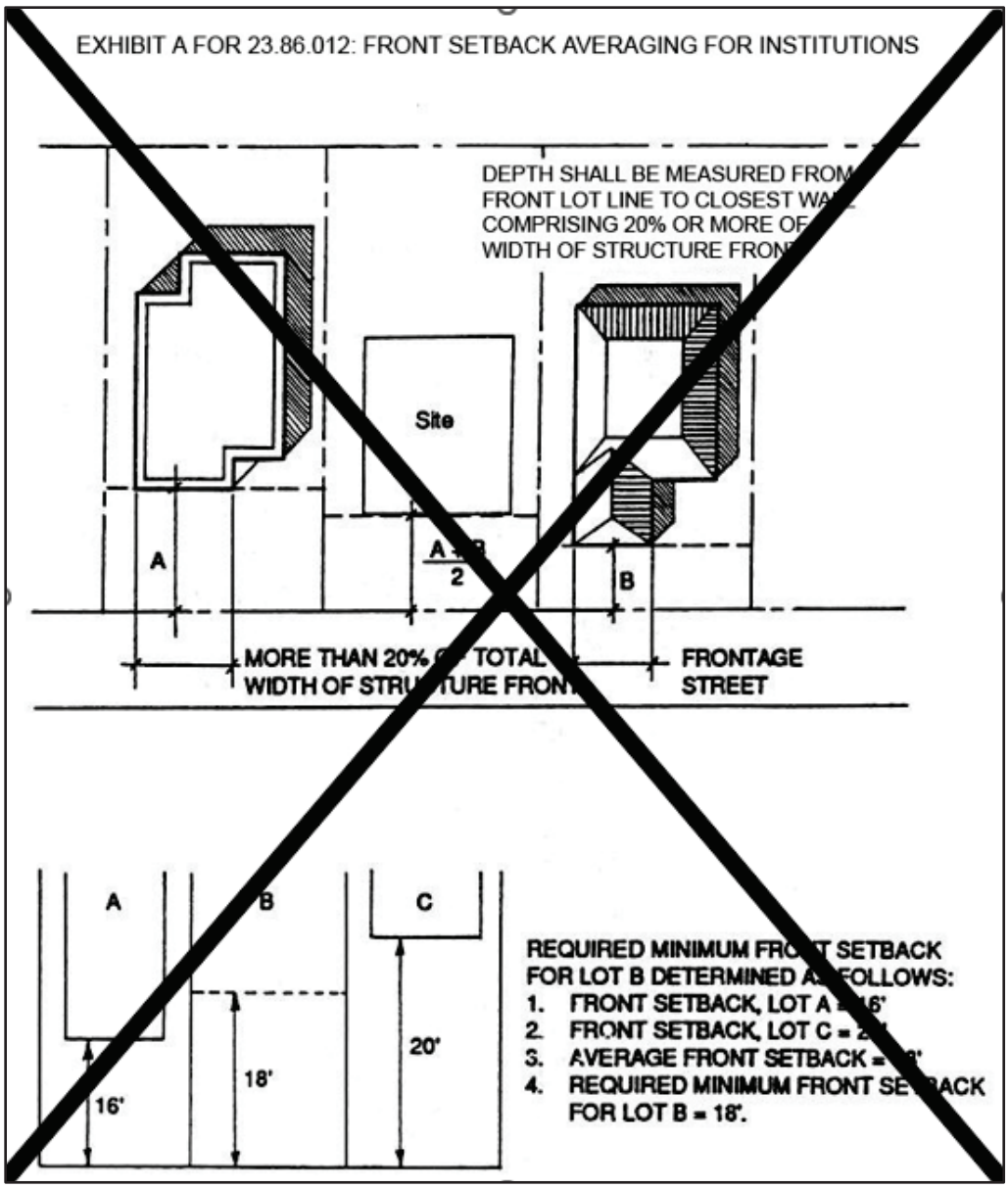
1. The average front and rear setbacks are calculated based on the entire width of the structure;

2. The average side setbacks are calculated based on the entire depth of the structure;

3. Setbacks are measured horizontally from the lot line to the facade of the structure. The facade(s) used in calculating the average and minimum setback requirements shall be those facades that are nearest to that lot line except that any features allowed to project into the setback are excluded.

((~~B. Determining front setbacks for institutions. In LR zones, the minimum required front setback for institutions is determined by averaging the setbacks of structures on either side of the subject lot, as follows:~~

~~1. The required front setback is the average of the distances between principal structures and front lot lines of the nearest principal structures on each side of the subject lot if each of those structures is on the same block front as the subject lot and is within 100 feet of the side lot lines of the subject lot (Exhibit A for 23.86.012).~~



~~2. If the first principal structure within 100 feet of a side lot line of the subject lot is not on the same block front or there is no principal structure within 100 feet of the side lot line, the setback depth used for averaging purposes on that side is 7 feet.~~

~~3. For averaging purposes, the front setback is the shortest distance from the front lot line to the nearest wall or, where there is no wall, the plane between supports that span 20 percent or more of the width of the front facade of the principal structure. Attached garages and enclosed porches are considered part of the principal structure for measurement purposes. Decks less than 18 inches above existing grade, uncovered porches, eaves, attached solar collectors and other similar parts of the structure are not considered part of the principal structure.~~

~~4. If there is a dedication of street right-of-way to bring the street abutting the lot closer to the minimum widths established in Section 23.53.015, for averaging purposes the amount of dedication is subtracted from the front setbacks of the structures on either side.~~

~~5. If the front setback of the first principal structure within 100 feet of the side lot line of the subject lot exceeds 20 feet, the setback depth used for averaging purposes on that side is 20 feet.~~

~~6. In cases where the street is very steep or winding, the Director will determine which adjacent structures should be used for averaging purposes.~~

~~7. In the case of a through lot, the front setback is determined independently for each street frontage. The measurement techniques of this section 23.86.012 apply to each street frontage separately.~~

~~8. For multiple structures on the same lot, the front setback of a principal structure on the same lot may be used for averaging purposes.~~))

C. Upper-level setback

1. Upper-level setbacks apply only to portions of structures that occur above the height at which the setback begins.

2. For upper-level setbacks required from a street lot line, the height at which the setback begins is measured at all points along the street lot line from sidewalk grade or, if there is no sidewalk, from finished grade at the street lot line.

3. For upper-level setbacks required from other lot lines, the height at which the setback begins is measured at all points along the lot line from the finished grade where the wall meets the grade or, if the structure is cantilevered or posted, where the downward projection of the portion of the structure that is cantilevered or posted meets the grade.

Section 58. Section 23.86.017 of the Seattle Municipal Code, enacted by Ordinance 123495, is amended as follows:

23.86.017 Amenity area measurement

Note: This section is proposed to be updated to remove a provision for woonerfs that has been problematic because the definition of woonerf is so broad that it has not been possible to get

agreement between project applications and reviewers. The woonerf provision has primarily been used to try justify approaches that are more car-friendly rather than innovative shared streets.

((~~Certain zones require a minimum amount of amenity area to be provided on the lot.~~)) If amenity area is required, the following provisions shall apply:

A. If the applicable development standards specify a minimum contiguous amenity area, areas smaller than the minimum contiguous area are not to be counted toward fulfilling amenity area requirements.

1. Driveways and vehicular access easements, whether paved or unpaved, shall be considered to separate the amenity areas they bisect((~~, except for woonerfs permitted to qualify as required amenity area~~)).

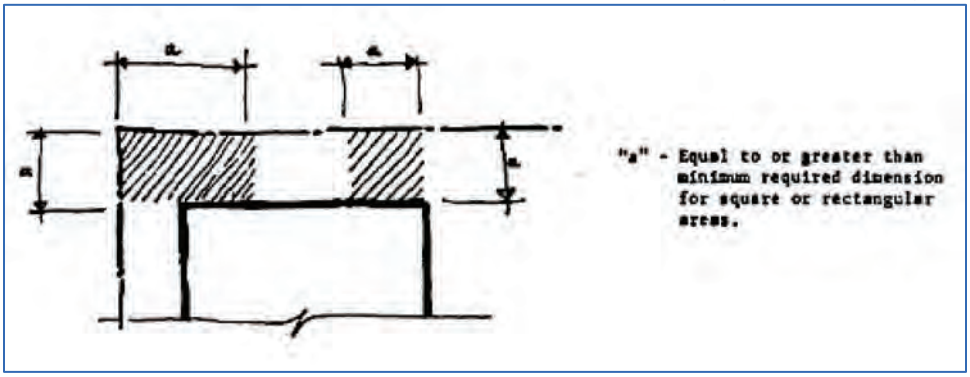
2. Pedestrian access areas shall not be considered to break the contiguity of amenity area on each side.

B. In shoreline areas, when determining the amount of amenity area required or provided, no land waterward of the ordinary high water mark shall be included in the calculation.

C. In cases where the shape or configuration of the amenity area is irregular or unusual, the Director shall determine whether amenity area requirements have been met, notwithstanding the following provisions, based on whether the proposed configuration would result in amenity area that is truly usable for normal residential recreational purposes. For the purpose of measuring the minimum horizontal dimension of the amenity area, if one is specified, the following provisions shall apply:

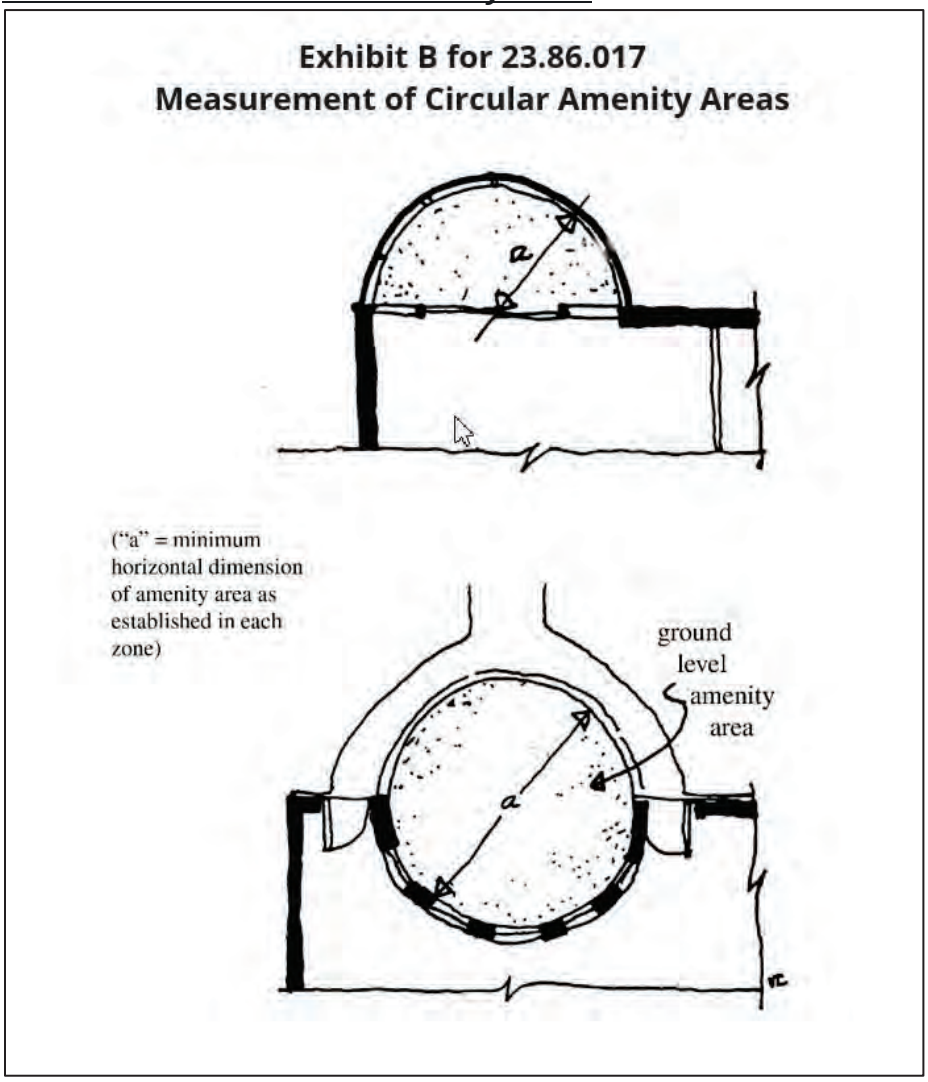
1. For rectangular or square areas, each exterior dimension of the area shall meet the minimum dimension (Exhibit A for 23.86.017).

Exhibit A for Section 23.86.017: Measurement of Regular Amenity Area



2. For circular areas, the diameter of the circle shall meet the minimum dimension; for semicircular areas, the radius of the area shall meet the minimum dimension (Exhibit B for 23.86.017).

Exhibit B for 23.86.017((~~: Measurement of Circular Amenity Areas~~))
Measurement of circular amenity areas



Section 59. Section 23.86.026 of the Seattle Municipal Code, last amended by Ordinance 124503, is amended as follows:

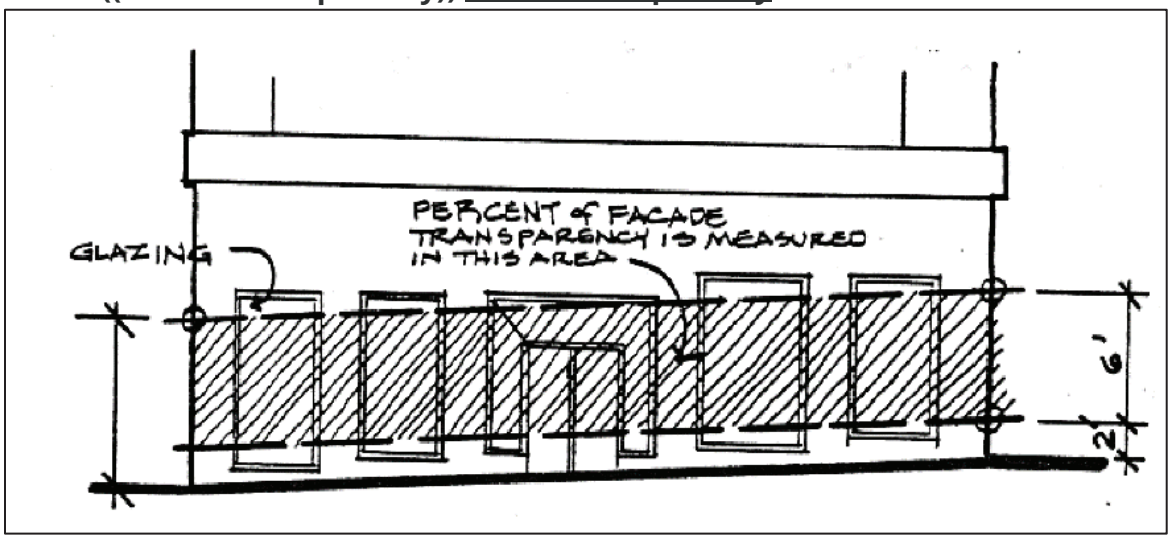
23.86.026 Facade transparency

Note: This section would be updated to clarify that facade transparency has a different calculation technique in Neighborhood Residential and Lowrise zones.

A. In zones other than Neighborhood Residential or Lowrise zones where a certain percentage of the street-facing facade is required to be transparent, transparency shall be measured in an area between 2 feet and 8 feet above the elevation of the lot line at the sidewalk, as depicted in Exhibit A for 23.86.026, unless a different area is specified in the development standards applicable to the lot. Areaways, stairways, and other excavations at the lot line shall not be considered in measuring the elevation of the street lot line. When sidewalk widening is required according to Section 23.49.022, the elevation of the lines establishing the new sidewalk width shall be used rather than the street lot line.

Exhibit A for 23.86.026

Street ((~~Facade Transparency~~)) facade transparency



B. When transparency is required for facades that abut bonused public open spaces, the measurement of facade transparency shall be from the elevation of the public open space.

C. The full length of ((~~landmark~~)) Landmark designated structures, and character structures retained according to Section 23.73.015, shall not be counted in determining the required transparency.

Section 60. Section 23.90.019 of the Seattle Municipal Code, last amended by Ordinance 126509, is amended as follows:

23.90.019 Civil penalty for unauthorized dwelling units ((~~in neighborhood residential zones~~))

Note: This section would be updated to reflect new definitions and to apply consistent rules for unauthorized dwelling units across all zones and building types.

In addition to any other sanction or remedial procedure that may be available, the following penalties apply to unauthorized dwelling units ((~~in neighborhood residential zones in violation of Section 23.44.006~~)). An owner of a ((~~neighborhood residential zoned~~)) lot ((~~that has more than one single-family dwelling unit and~~)) who is issued a notice of violation for an unauthorized dwelling unit, is subject to a civil penalty of $5,000 for each ((~~additional~~)) dwelling unit((~~, unless the additional unit is an authorized dwelling unit in compliance with Section 23.44.041, is a legal non-conforming use, or is approved as part of an administrative conditional use permit pursuant to Section 25.09.260~~)). Penalties for ((~~violation of Sections 23.44.006 and 23.44.041, except for violations of subsection 23.44.041.C or except for those violations subject to subsection 23.90.018.B,~~)) unauthorized dwelling units in this Section 23.90.019 shall be reduced from $5,000 to $500 if, prior to the compliance date stated on the notice of violation for an unauthorized dwelling unit, the dwelling unit is removed or authorized ((~~in compliance with Section 23.44.041~~)), is a legal non-conforming use, or is approved as part of an administrative conditional use permit pursuant to Section 25.09.260.

Changes to other Titles

Section 61. Section 25.09.052 of the Seattle Municipal Code, last amended by Ordinance 126685, is amended as follows:

25.09.052 Replacing structures in environmentally critical areas and buffers

A. Replacing structures destroyed by acts of nature and other acts beyond the control of the owner excluding normal deterioration

1. Replacing any structure destroyed by acts of nature is allowed if it complies with the following provisions:

a. The replacement is located within the same footprint as and does not exceed the height of the destroyed structure;

b. The replacement does not increase the impact to or further alter an environmentally critical area or buffer;

c. Action toward the replacement is commenced within one year of the destruction of the structure;

d. A permit application for the replacement is submitted within two years; and

e. The replacement is diligently pursued.

2. A structure that is replaced and activities related to replacing the structure shall:

a. Comply with restrictions on flood hazard areas reconstruction, if the structure is located in a flood-prone area; and

b. Comply with the development standards for the environmentally critical area and buffer in which it is located to the maximum extent feasible, including requirements for access and shall comply with the standards in Sections 25.09.060, 25.09.065, and 25.09.070.

B. Replacing a ((~~single-family residence~~)) detached dwelling unit voluntarily in wetlands, wetland buffers, and fish and wildlife habitat conservation areas

1. Replacing a ((~~single-family residence~~)) detached dwelling unit and its appurtenant structures and access is allowed in wetlands, wetland buffers, and fish and wildlife habitat conservation areas if the replacement complies with the following:

a. The replacement is in substantially the same location as the original development;

b. The area of the footprint of the replacement does not exceed that of the original development;

c. The proposed access does not exceed the width and length of necessary access;

d. Lot size

1) Riparian watercourse and wetlands. For a ((~~single-family residence~~)) detached dwelling unit located over a riparian watercourse or built in a wetland, the replaced ((~~residence~~)) dwelling unit and necessary access meets wetland buffer or riparian management area requirements to the maximum extent feasible; or

2) For all other property, the lot does not have sufficient area to site a ((~~residence~~)) dwelling unit with the same area of footprint as existed on May 14,

2017, plus necessary access, consistent with the regulations for the applicable environmentally critical area and buffer, including reducing the yard and setback requirements for front and rear yards ((~~in Title 23~~)) allowed under Section 25.09.280, except subsection 25.09.280.B.2, to the minimum necessary to accommodate the ((~~residence~~)) dwelling unit and necessary access; and

e. The site for the ((~~residence~~)) dwelling unit, necessary access, and utilities has the least impact on the functions and values of the environmentally critical area.

2. A structure that is replaced and activities related to replacing the structure shall:

a. Comply with restrictions on flood hazard areas reconstruction, if the structure is located in a flood-prone area; and

b. Comply with the development standards for the environmentally critical area and buffer in which it is located to the maximum extent feasible, including requirements for access and shall comply with the standards in Sections 25.09.060, 25.09.065, and 25.09.070; and

c. Mitigate impacts to the functions and values of the environmentally critical area and buffers, in compliance with Section 25.09.065, including any impacts caused by removing the ((~~residence~~)) dwelling unit from its original location, runoff from impervious surfaces, and/or replacing any portion of the ((~~residence~~)) dwelling unit within the environmentally critical area or buffer.

Section 62. Section 25.09.240 of the Seattle Municipal Code, last amended by Ordinance 126509, is amended as follows:

25.09.240 Short subdivisions and subdivisions

Note: This section would be amended to reflect that standards for measuring lot coverage on sites with environmentally critical area have been added directly to the relevant sections in the NR and LR chapters.

* * *

((~~D. Development standards for new lots in neighborhood residential zones. If new lots are created in neighborhood residential zones by short subdivision or subdivision, the following development standards apply based on the area of each new lot that is outside~~

~~the environmentally critical areas listed in subsection 25.09.240.A, plus environmentally critical areas in which development is allowed pursuant to subsections 25.09.240.B.1, 25.09.240.B.2, and 25.09.240.B.3:~~

~~1. Lot coverage and lot coverage exceptions according to subsections 23.44.010.C and 23.44.010.D.~~

~~2. Height limits according to Section 23.44.012, including the requirements of subsection 23.44.012.A.3 if the area of the largest rectangle or other quadrilateral that can be drawn within the lot lines of the new lot outside the environmentally critical areas is less than 3,200 square feet.~~))

((~~E~~)) D. Lots shall be configured to preserve the environmentally critical areas and buffers identified in subsection 25.09.240.A by:

1. Establishing a separate buffer tract or lot with each owner having an undivided interest; or

2. Establishing non-disturbance areas on individual lots.

((~~F~~)) E. The environmentally critical areas and buffers identified in subsection 25.09.240.A, except for areas qualifying for development under subsections 25.09.240.B.1, 25.09.240.B.2, and 25.09.240.B.3, shall be designated non-disturbance areas on the final plat. A statement that these non-disturbance areas are located on the lots and the definition of "non-disturbance area" shall be recorded in the King County Recorder's Office along with the final plat in a form approved by the Director. At the same time, a covenant protecting non-disturbance areas shall be recorded as set out in Section 25.09.335.

((~~G~~)) F. In computing the number of lots a parcel in a ((~~neighborhood residential~~)) Neighborhood Residential zone may contain, the Director shall exclude ((~~the following areas:~~

~~1. The~~)) environmentally critical areas and buffers identified in subsection 25.09.240.A, unless:

((~~a~~)) 1. The environmentally critical areas and buffers are on a lot that meets the provisions of subsection 25.09.240.B; or

((~~b~~)) 2. The applicant obtains an administrative conditional use under Section 25.09.260, if it is not practicable to meet the requirements of subsection 25.09.240.B considering the parcel as a whole.

Section 63. Section 25.09.260 of the Seattle Municipal Code, last amended by Ordinance 126509, is amended as follows:

25.09.260 Environmentally critical areas administrative conditional use

Note: This section would be amended to remove yard reductions that are no longer relevant due to updated setback requirements.

A. Administrative conditional use

1. ((~~In neighborhood residential zones the Director is authorized to approve an environmentally critical areas administrative conditional use pursuant to Section 23.42.042 and this Section 25.09.260 for one or both of the following purposes:~~

~~a.~~)) In calculating the maximum number of lots and units allowed on the entire parcel in Neighborhood Residential zones under Section 23.44.012 and subsection 25.09.240.G, the Director may count ((~~environmentally critical areas and/or buffers, except the open water area of a wetland or riparian corridor,~~)) steep slope erosion hazard area or buffer that would otherwise be excluded, if an applicant is unable to demonstrate compliance with the requirements of subsection 25.09.240.B for the entire parcel proposed to be subdivided.

((~~b. For the entire parcel proposed to be subdivided, the Director may approve development of single family residences that meet the development standards of subsection 25.09.260.B.3 and the platting conditions in subsections 25.09.260.B.1 and 25.09.260.C.2.b. Except as specifically superseded by the development standards of subsection 25.09.260.B.3 and the platting conditions of subsection 25.09.260.C.2.b, all applicable regulations of Title 23 shall also apply to the entire parcel. The entire parcel is designated as the site.~~))

2. Process. If an administrative conditional use application includes an application to authorize development in a steep slope erosion hazard area or buffer, the application is not required to include an application for the variances allowed under Sections 25.09.280 or 25.09.290, but the application must address the criteria listed in subsection 25.09.260.B.1.c.

B. Criteria. An application under this Section 25.09.260 shall provide information sufficient to demonstrate that the proposal meets the following criteria:

1. Environmental impacts on environmentally critical areas and buffers

a. No development is in a biodiversity area or corridor, riparian corridor, wetland, or wetland buffer.

b. No riparian management area or wetland buffer is reduced.

c. ((~~No development is on a steep slope erosion hazard area or its buffer unless either the~~)) The proposed development meets the criteria of subsections 25.09.090.B.2.a, 25.09.090.B.2.b, or 25.09.090.B.2.c or the property is a lot in existence as a legal building site prior to October 31, 1992, is predominantly characterized by steep slope erosion hazard areas, and the following criteria are met:

1) The proposed development shall be located away from steep slope erosion hazard areas and buffers to the extent practicable.

2) The Director shall require clear and convincing evidence that the provisions of this subsection 25.09.260.B are met if development is located on steep slope erosion hazard areas and buffers with these characteristics:

a) A wetland over 1,500 square feet in size or a watercourse designated part of a riparian corridor;

b) An undeveloped area over 5 acres characterized by steep slope erosion hazard areas; or

c) Areas designated by the Washington Department of Fish and Wildlife (WDFW) as biodiversity areas and corridors, or areas identified by the Director with significant tree and vegetation cover providing wildlife habitat.

3) ((~~If the application includes a proposal to develop in a steep slope erosion hazard area or buffer, the~~)) The development in the steep slope erosion hazard area or buffer shall be the minimum necessary to achieve the number of ((~~single family~~)) dwelling units that would be allowed on the original entire parcel according to the calculation for subdivision required under subsection 25.09.240.G in the following order of priority:

a) ((~~The proposal reduces the front and/or rear yards pursuant to subsection 25.09.260.B.3.b.1 and complies with the building separation standards of subsections 25.09.260.B.3.b.2 and 25.09.260.B.3.b.3;~~

~~b)~~)) The proposal reduces the steep slope erosion hazard area buffer; and

((~~c~~)) b) The proposal intrudes into not more than 30 percent of the steep slope erosion hazard area.

d. The proposal protects WDFW priority species and maintains wildlife habitat.

e. The proposal does not result in unmitigated negative environmental impacts pursuant to Section 25.09.065, including drainage and water quality, erosion, loss of trees and vegetation, and slope stability on the identified environmentally critical area and buffer.

f. The proposal promotes expansion, restoration, or enhancement of the identified environmentally critical area and buffer.

2. General environmental impacts and site characteristics

a. The proposal minimizes potential negative effects of the development on the undeveloped portion of the site and preserves topographic features.

b. The proposal retains and protects trees and vegetation on designated non-disturbance areas, protects stands of mature trees, minimizes tree removal, removes noxious weeds and non-native vegetation and replaces this vegetation with native trees and vegetation, and protects the visual continuity of treed and vegetated areas and tree canopy.

((~~3. Development standards~~

~~a. The total number of single-family dwelling units permitted through the environmentally critical areas conditional use regulations shall not exceed the number that would be allowed based on compliance with the use regulations of Section 23.44.008, and the minimum lot area standards of the underlying neighborhood residential zone, and shall be established only on the site comprised of the original entire parcel, with subdivision of the original entire parcel allowed only as unit lots approved through the unit lot subdivision process in Section 25.09.260.C.2.b.2.~~

~~b. Single-family dwelling units shall be the sole type of principal use permitted through the environmentally critical areas conditional use regulations and shall meet the development standards of Chapter 23.44, except that the following standards apply instead of the standards in Chapter 23.44, as applicable:~~

~~1) Front and rear yards required by subsections 23.44.014.A and 23.44.014.B may be reduced to no less than 10 feet each and 30 feet for the sum of both yards if the reduction would minimize or eliminate any intrusion into the steep slope erosion hazard area or required buffer;~~

~~2) Front and rear building separations between proposed single family residences shall be a minimum of 25 feet;~~

~~3) Side building separations shall be a minimum of 10 feet;~~

~~4) The maximum lot coverage shall be calculated by deducting required non-disturbance areas from total lot size; and~~

~~5) Front, rear, and side separations shall be determined by the Director, based on location of the building in relation to other buildings and the front lot line.~~))

C. Conditions

1. In authorizing an administrative conditional use, mitigation pursuant to Section 25.09.065 shall apply to protect and mitigate negative impacts to biodiversity areas and corridors, priority habitat and setbacks, riparian corridors, wetlands, wetland buffers, and steep slope erosion hazard areas and buffers, and the Director may impose additional conditions to protect other properties that could be adversely affected in the zone or vicinity in which the property is located.

2. In addition to any conditions imposed under subsection 25.09.260.C.1, the following conditions apply to all administrative conditional uses approved under this Section 25.09.260:

a. Replacement and establishment of native trees and vegetation shall be required where it is not possible to save trees and vegetation and shall comply with Section 25.09.070.

b. If a subdivision or short-subdivision is proposed, the following standards apply:

1) The development as a whole shall meet development standards under Title 23 and this Chapter 25.09 applicable at the time the application is vested.

2) ((~~A unit lot short subdivision or unit lot subdivision proposal shall be required to ensure that the development standards of subsection 25.09.260.B.3 are implemented for development.~~)) New unit lots created under this Section 25.09.260 shall be approved through the unit lot subdivision regulations of Sections 23.22.062 and 23.24.045 and by compliance with this Section 25.09.260. Development on individual unit lots, except as otherwise set forth in this Section 25.09.260, may be nonconforming as to some or all of the development standards.

3) Subsequent platting actions or additions or modifications to structures may not create or increase any nonconformity of the development as a whole to this Chapter 25.09, and this shall be noted on the document creating the new unit lots that is recorded with the King County Recorder's Office.

4) Access easements and joint use and maintenance agreements shall be executed for use of common garage or parking areas, common open space, and other similar features and be recorded with the King County Recorder's Office.

D. The Director shall issue written findings of fact and conclusions to support the Director's decision. The process and procedures for notice of decision and appeal of this administrative conditional use shall be as prescribed for Type II land use decisions in Chapter 23.76.

Section 64. Section 25.09.520 of the Seattle Municipal Code, last amended by Ordinance 126685, is amended as follows:

25.09.520 Definitions

* * *

"Department" means the Seattle Department of Construction and Inspections or its successor department.

"Detached dwelling unit" means a detached dwelling unit as defined in Section 23.84A.008

* * *

((~~"Single-family residence" means single-family dwelling unit as defined in Section 23.84A.032 in the definition of "residential use."~~))

* * *

Section 65. Section 25.11.090 of the Seattle Municipal Code, last amended by Ordinance 126821, is amended as follows:

25.11.090 Tree replacement, maintenance, and site restoration

Note: This section would be amended to clarify how the new tree point system in NR zones relates to tree replacement requirements.

A. In all zones, Tier 1, Tier 2, and Tier 3 trees removed in association with development or because they are hazardous, infested by insects, pests, or pathogens, or an invasive or nuisance tree, or in accordance with the removal criteria in subsection 25.11.050.D, shall be replaced by one or more new trees, the size and species of which shall be determined by the Director; the tree replacement required shall be designed to result, upon maturity, in a canopy cover that is at least roughly proportional to the canopy cover prior to tree removal. Site restoration where there is on-site tree replacement in association with development shall include the removal of all invasive vegetation and shall prohibit replacement with invasive species. When on-site replacement is proposed, such trees count toward the Green Factor under ((~~SMC~~)) Section 23.86.019 and private property tree point requirements under subsection 23.44.024. When off-site replacement is proposed, preference for the location shall be on public property.

B. For each relocated or required replacement tree, maintenance and monitoring is required for a five-year period. The period begins when the replacement tree is planted. Maintenance and monitoring shall include the following:

1. Sufficient maintenance actions to ensure survival of the replacement tree:

a. When more than one replacement tree is required, 80 percent survival of new trees planted at the end of five years;

b. When one replacement tree is required, 100 percent survival of the new tree planted at the end of five years;

2. Replacement and replanting of failed trees; and

3. Photographic documentation of planting success retained for the five-year period. Submission of documentation to the Seattle Department of Construction and Inspections is not required unless requested by the Department.

C. In addition to the maintenance actions for replacement trees described in subsection 25.11.090.B.1, the Director shall promulgate rules to maintain the long-term health and ensure survival of replacement trees. This shall include rules that specify:

1. The watering of replacement trees necessary to ensure survival; and

2. Tree species that will fulfill the replacement requirement. Qualifying tree species shall be limited to trees that are native and/or culturally significant, and resilient to climate change.

D. The locations of replacement and relocated trees shall be available to the public on a City web page through an online mapping tool by March 31, 2024.

K Marked Draft EIS Comment Letters

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Letter 1

May 20, 2024

Jim Holmes
City of Seattle Office of Planning & Community Development
Planning and Community Development
P.O. Box 94788
Seattle, WA, 98124-7088

Via e-mail to: jim.holmes@seattle.gov

Re. Snoqualmie Tribe's comments on the City of Seattle Comprehensive Plan DEIS

Dear Mr. Holmes,

The Snoqualmie Indian Tribe ("Tribe") has reviewed the City of Seattle's Draft Comprehensive Plan DEIS. Please find the Tribe's comments for the Draft:

1. Section 1.3: The Study Area should be expanded to include waters and lands affected by City Utilities and City-owned properties that exist outside of City Limits. City Comp Plan policies affect these lands, the use of land and waters, and affect Tribal inherent and sovereign rights which must be fully considered.

2. Page 1-26, "With Mitigation..." section: The City is a key influencer of local and regional earth and water processes. While the City is already heavily developed, future development will still potentially cause significant adverse impacts. While Seattle is a degraded habitat, it is still habitat. People and wildlife rely on the integrity of earth and water resources being protected and preserved in the City. Also, City policies affect resources outside the City, such as water impoundment and export related to City reservoirs. 1-1

3. Section 3.12.1: As in comment 1 above, the entire area served by wholesale customers and covered by City projects should be included in the DEIS.

4. General Comment: The DEIS lacks analysis of the effects of the City's policies regarding tree canopy. The City must analyze the effects of its interpretation of "equity" regarding tree canopy, where the City allows degradation in some areas while waiting for new trees to grow in other areas. Instead of this policy, the City should focus on preserving canopy in all parts of the City while also uplifting overburdened communities' canopy. In any case, the DEIS fails to make this critical analysis. 1-2

5. General Comment: The City of Seattle was platted 173 years ago in 1851, and its namesake is the respected leader siʔaɬ. However, the first ləliʔaʔkʷbixʷ (Non-Indigenous Colonizers) built this young village upon the ancient inter-Tribal trade, commercial, cultural, and governmental hub of the Northwest 1-3

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Coast, dᶻidᶻələ́lič. The connection the ʔaciɬtalbixʷ (all of the Puget Sound People, often translated as the simplified and colonized terms “Native American” or “Indian”) have to the larger Puget Sound region reaches back into history 13 millennia and continues into 2024. This connection and legacy of ecological stewardship, cultural heritage, and sustainable environmental practices continue to be supported archaeologically and Ethno-historically for over 12,000 years, A.KA., since time immemorial.

The Snoqualmie Indian Tribe appreciates the opportunity comment on these draft updates to the City of Seattle Comprehensive Plan DEIS. We welcome any questions or clarification you have on these comments.

1-3 Cont.

Sincerely,

DocuSigned by:
Cindy Spiry
4F29C7E29A044FA...
Cindy Spiry, Director
Env. and Natural Resources Dept.

DocuSigned by:
Jaime Martin
55ECFF68F5D44FA...
Jaime Martin, Executive Director
Government Affairs and Special Projects

DocuSigned by:
Steven Moses
BFAA35FF98E048D...
Steven Moses, Director
Archaeology & Historic Preservation

CC:

Letter 2

To: Mayor Harrel; Seattle Office of Planning and Community Development
OneSeattleCompPlan@seattle.gov
CC: City Council Members
From: Representative Gerry Pollet, 46th District (Gerry.pollet@leg.wa.gov; gerry@gerrypollet.com)
Comments on the One Seattle Draft Comprehensive Plan and Draft EIS
May 5, 2024

Mayor Harell, OPCD and Council Members:

I join other members of the Seattle Legislative Delegation in thanking you for briefings and committing to work with the City and your staff to improve the One Seattle Plan (Draft Comprehensive Plan) as incorporated below.

I join many of my Seattle Legislative Delegation colleagues in their comments, which begin:

> Thank you for the briefing your team provided to the Seattle legislative delegation on the initial draft of the One Seattle Comprehensive Plan. We appreciate the opportunity to share our feedback based on years of working with community members on these complex issues.
>
> As legislators, we share the goals you and your team outlined in the plan, including increasing housing and affordability, promoting a more equitable city as we grow, and focusing investment on building complete, walkable communities. We have concerns that the first draft release of the One Seattle Plan falls short of these shared ambitions, particularly as it relates to encouraging diverse housing types, equitable development, affordability, and displacement protections.
>
> Seattle legislators have led our colleagues in policymaking to address a statewide housing crisis which impacts our city most acutely, through the passage of landmark bills such as HB 1923 in 2019, HB 1220 in 2021 and HB 1110 in 2023, among others. We are deeply in tune with what Seattleites are asking for – a housing plan that encourages the development of dense and vibrant communities. As such, **we are asking to partner with you and your staff to update the housing provisions in the current draft plan to fully realize our collective bold vision for the city's housing future.**
>
> Washington State is experiencing a housing crisis caused in large part by a shortage of homes and many of us have been working to address this for several years if not our whole careers. We are proud of the actions the legislature has acted to enable the construction of diverse housing options by legalizing permanent supportive housing, accessory dwelling units, middle housing, and co-living spaces. These steps are crucial to beginning to bend the curve of our housing shortage and begin building abundant housing. **Our local governments are essential partners in facing this challenge and taking adequate steps to address it.**

2-1

In addition, I provide my own comments on key elements of the Plan and the draft EIS which include:

- Urging **adoption of an increased goal for housing units; and specifically calling out the need for the Plan to meet the requirements of HB 1220 (2021), now codified in RCW 36.70A.070(2).**

2-2

Those requirements are for the Plan to identify the needs for housing units for households at every economic / income level and plans for how the City will meet those needs.[1] The draft Plan fails to provide any plan to meet these needs, particularly for lower income residents and working families, in addition to the overall goal for housing units being inadequate.

- As part of this increased goal, I agree with other legislators who have urged increasing the number of "neighborhood centers." The Plan should assess what radius to include in various settings and how to ensure via good planning that neighborhoods transition from higher to loser density with distance from the fixed transit and commercial center.[2]
- Alternatives 2, 3 and 5 would result in approximately 20,000 more housing units over the next twenty years than the no action alternative base of 80,000; and Alternative 5 would produce an estimated 40,000 more units. Reductions in areas proposed for neighborhood centers, etc. would result in the proposed Plan only increasing the number of housing units projected for by 2045 from 80,000 to 89,000.[3]

  This meager increase is not the level of growth in housing units that my constituents and I believe is adequate or acceptable.

2-2 cont

- Your administration worked closely with me to ensure that Seattle was not preempted from applying its own anti-displacement and affordable housing programs in housing legislation, such as for middle housing (HB 1110). I appreciated that close collaboration.

  Thus, I have been surprised in my extensive reading of the Plan and participating in several briefings, meetings and open houses to find that there is no meaningful discussion, *new* proposals or consideration in the Plan of appropriate policies to prevent displacement in the identified areas with high displacement potential for people /

[1] The requirements include identifying "sufficient capacity of land" to meet the identified needs for housing that is affordable to each economic segment of households in the City. RCW 36.70A.070(2)(c). The Plan does identify land for duplexes, triplexes and town homes (and four units per lot in each residential area and six units when closer to major transit stops, pursuant to HB 1110). But the Plan and EIS do not propose or assess any strategies for designating land or what portion of available land that will be available for the required units of housing to be built that is affordable to persons in each income segment below median income. The number of units identified as needed for households below 120% median and above the levels eligible for publicly supported subsidized housing dwarfs the number of units projected as needed for households over 120% of median. The Plan lacks any proposal and analysis of how the City will meet this need for housing for persons of modest income who are often the backbone of our workforce that we want to attract and keep in Seattle, such as educators, workers in health care, social workers, hospitality workers and police.

[2] Increasing multifamily midrise [over 3 story] development over 3-5 blocks from frequent transit and which is not centered on permanently anchored frequent bus transit or stable commercial development is likely to leave residents stranded, e.g., when a bus stop or route is moved, or private commercial stores closed. Many constituents in the 46th District have moved to live close to bus transit, which they relied on for work health care and school – including high school students, and subsequently found themselves without reliable transit when bus service was reduced or eliminated. The Plan and the transportation element must include commitments for reliable continuity of bus service for areas that are designated to have increased housing based on proximity to bus service.

[3] See Draft EIS Vol 3. 3 for an example of the summary of housing units for each alternative.

households who currently reside in housing that is affordable for persons in the below median income levels. Indeed, the Plan and Draft EIS leave the City and public without a clear view of the likely degree of loss of "naturally" occurring affordable housing and alternatives for preserving communities and affordable housing opportunities in these high risk areas.

2-2 cont

I hope to be able to partner with you and the City to ensure that the City has all the tools it needs to prevent displacement and preserve affordable housing.

- The City is missing an opportunity to develop a plan for how it will attract and retain families with school age children and essential workers in health care, education, other public services, hospitality, etc. Retaining these important portions of our workforce depends on producing housing that is affordable to moderate income households. If the City only plans for increasing housing by 89,000 units, then market forces will result in the growing high income workforce gobbling up a disproportionate share of new housing and forcing all housing rents and prices to skyrocket. The City should adopt a proactive plan to provide support for public service workers with families, including health care workers and educators, to afford rent and purchase of homes in Seattle. This would entail programs that provide incentives for inclusion of those units in new developments and subsidies.

  The Plan does not include any provision to ensure that modest income working households will be able to afford housing in the areas of increased density in Regional Centers. The City should include a commitment to revisit the HALA program to have housing which is affordable at different income levels in all housing that benefits from proximity to the massive public investments in transit and other infrastructure. 2-3
    - The City could consider using a form of tax increment financing to capture the greatly increased value of properties near our public transit and infrastructure investments, e.g., NE 130th St. Station upzone area, and devote the revenues to providing affordable housing in those units. This could be done either through direct subsidy of rent or purchase or building units (with nonprofit partners). This, of course, could be included as an anti-displacement strategy.

  For example, the plan and EIS do not consider new approaches to use of the Multi Family Tax Exemption (or even if it would be more cost effective to stop losing property tax revenue in exchange for a small portion of units being set aside in MFTE developments and, instead, use the increased revenue to provide funds for building new affordable units and providing subsidies.

- The Plan should commit to ensuring that new housing developments that benefit from proximity to the taxpayers' massive investments in light rail, fixed transit and other infrastructure do not result in windfall profits and exclusive high income housing. Increased housing density near public investments in transit should be accompanied by a **change to HALA policies to require inclusion of affordable units of housing in new developments** taking advantage of increased density allowances. Equity and improving access to the benefits of transit and other public infrastructure should be reflected in adoption of policies to ensure that a significant number (20-25%) of housing

units in these areas serve the City's goals to provide affordable housing for persons (and family units) at the <30%, < 60%, < 80% and < 100% AMI levels.

Why should the beneficiaries of the increased housing around public investment in transit go only to the highest income level households? Why should the developers of these properties not be required to share the windfall from the public investment by including housing for lower income households?

2-3 cont

- **The Plan and EIS fail to address new statutory requirements for consideration of climate change and environmental justice**. This includes failing to address the City's admitted **backsliding on Seattle's adopted goal to have 30% tree canopy by 2037**, and the documented impacts this has on human health and the environment for overburdened communities and vulnerable populations.

2-4

- The new Urban Center at NE 130th St: I have heard from numerous constituents that this area should have additional planning with additional density along Roosevelt Way NE. Currently, the plan is centered on the future light rail station – which is years away. Commercial and midrise development are already anchoring Roosevelt Way NE. Allowing for further development potential would create a neighborhood center that is viable and strong.

2-5

The Draft Comprehensive Plan and EIS Fail to Reflect the Requirements of HB 1220, Which Requires Cities to Plan for Adequate Housing to Meet the Needs of Residents of All Economic and Income Levels.

- HB 1220 / RCW 36.70A.070(2) requires planning to meet projected housing needs for households at every income level. This is a major change from prior planning cycles when cities only had to identify capacity to meet an overall housing need for the projected growth in population. **The draft Plan fails to identify a plan to meet these needs at each income level, particularly for lower income residents and working families, in addition to the overall goal for housing units being inadequate**.

- The Plan forecasts that approximately 20,000 housing units are needed for households between 50% AMI and 120% AMI by 2045. Housing Appendix Tabel 2, Page 14.

2-6

- The Plan forecasts about 13% of the projected 89,000 units needed by 2045 will be for housing affordable to households earning from 50 to 80% AMI, or 11,570 units.[4]

- After identifying these targets, per RCW 36.70A.070(2), **the Plan and EIS fail to propose how a new Plan will ensure that there is housing for each of these segments of our population.**

- *The Plan misses the opportunity for Seattle to adopt a more aggressive target to attract more essential workers, public servants, educators, etc. to live in Seattle by ensuring that there will be housing affordable to these households earning below 100% AMI.*

[4] Id.

- The Plan and forecast fail to take into account that the AMI for Seattle has skyrocketed due to the influx of very high wage tech workers.
- The Plan should assess workforce housing needs for city employees and other public servants, educators, health care workers and what housing strategies can increase housing available for those households.

- The overall housing need from 2019 – 2045 was projected at 112,000. The Plan is for 2025-25, a twenty year window. However, the City chose a goal of 89,000 units. The minimum goal should have been in the 110,000 range.

- 63% of the housing needed is for households <80% AMI.[5] That would be 56,070 units. What is the plan to build 56,070 units affordable to persons below 80% AMI? The Plan lacks any plan to add 56,070 affordable housing units.

  Moreover, the plan acknowledges that the middle income level housing needs are double that forecast. If governmental supported housing is relied on for the 0-50% AMI bands, a plan is needed for how the city will ensure adding about 13% of the need for housing from 50 to 80% AMI, or 11,570 units[6] and for approximately 20,000 units for households with incomes of 50-120% of AMI.[7]

- The Commerce model relied on for these projections dramatically underestimated the need for moderate income housing in Seattle. It is based on the erroneous theoretical assumption that each new unit added to accommodate a currently cost burdened lower income household frees up one additional housing unit in the income band above it.[8] This is clearly at odds with reality in Seattle where the lower income need remains far above the new supply. This also ignores the reality that the City has thousands of unhoused residents awaiting new housing units. Adding desperately new units for thee extremely low and very low income level unhoused residents does not free up a housing unit in the economic band above. Thus, the new unit at 0-30% or 30-50% AMI *does not* vacate a unit for someone else who is in the next higher up income to now rent the vacated apartment without being cost burdened. Another household in the lower income level desperate to find housing close to work, healthcare or school will be cost burdened and seek to fill the unit vacated by someone moving to publicly supported housing and the pressure from higher income workers joining the city's workforce will keep the rent high.
  - As the Housing Appendix acknowledges, this model likely results in a major underestimation of housing need at the lower and middle levels:

    > "By assuming needs within the lowest income categories are met, the model may underestimate needs of other low- and moderate-income households. After all, if the needs of the lowest-income households remain unmet, those shortfalls will not only leave those households cost

2-6 cont

[5] Housing Appendix at page 16
[6] Id.
[7] Draft Plan page 94.
[8] Housing Appendix footnote 12, page 15.

burdened but also contribute to shortages felt by households somewhat higher up the income ladder."[9]

- **Thus, at least another 11,570 units affordable for households earning from 50-80% AMI should be in the Plan's goals**.

- HB 1110, for example defines affordable housing at <60% of AMI for renting and < 80% for home ownership. The Plan is required to implement HB 1110 but does not reflect this aspect. Nor does it include a breakout of need for these units rather than breaking out need for housing for households earning over or under 120% AMI and for low and extremely low incomes.

- The Plan should include proposals to ensure that the full mix of housing units proposed under HB 1110 (which includes stacked flats, cottages, and duplexes through sixplexes) to be affordable for purchase by households < 80% AMI or rented by those <60% AMI will be available to meet the projected need.

- **In addition to planning just by income level, the Plan should revisit the City's definition of family sized housing**. This is now defined as 2 bedrooms. There is no analysis of the impact of this on the ability of households with school age children to remain in Seattle Public Schools and reside in Seattle. At minimum, the Plan should include policies for households needing 3 bedrooms.

2-6 cont

Tree Canopy and Climate; Tree Preservation and other Environmental Elements are Not Adequately Addressed in the EIS. Required Mitigation Measures to Achieve Policies are Not Addressed or Proposed in the Comprehensive Plan or SEPA Review / EIS.

The results from this failure to properly address the required climate change and tree canopy policies and lack of inclusion in the Plan and lack of analysis in the EIS are likely to be:

- a tremendous loss of mature tree canopy as the City falls further and further behind from its **adopted policy goal for 30% tree canopy coverage by 2037**;
- adverse health impacts from loss of tree and green space (particularly for overburdened or highly impacted communities);
    - health impacts will almost certainly include increasing mortality and hospitalizations of vulnerable populations due to projected increasing days of severe high temperature with the highest temperatures in residential areas that lack tree canopy and whose residents have the most adverse social determinants of health (e.g., overburdened and highly impacted communities and populations under the State HEAL Act).
- adverse impacts due to increased storm water runoff, including stream erosion, contamination entering surface waters, harm to salmon or fish habitat and recovery and biological diversity in surface waters and shoreline habitat,
- impacts on meeting legal requirements to reduce combined sewage overflows and lack of mitigation for increased runoff from increasing impervious surfaces from other plan policies.

2-7

[9] Housing Appendix page 16.

Mature trees in urban settings have been well documented to reduce stormwater runoff[10] as well as decreasing urban temperatures. As such mature tree canopy must be an important element of a climate change element under comprehensive planning to reduce the impacts of climate change and severe high temperatures, particularly in residential areas with lower and moderate income residents and older housing stock that lack air conditioners.

The findings of the City's own Tree Canopy Assessment were summarized by the City:

- **Canopy loss is not happening equitably.** Neighborhoods impacted by racial and economic injustice started with less canopy and lost more than the citywide average. Compared to neighborhoods with greater advantages,[1] these neighborhoods had 31% less canopy in 2021, an increase in disparity from 2016 (when they had 27% less). While there were some canopy gains in environmental justice priority areas attributed to forest restoration programs, the losses outpaced the gains.

- **Tree canopy cover is critical for lowering temperatures and reducing heat island effects in our warming climate**. Trees are a key component of our climate preparedness and resilience strategies as they protect us from extreme heat and improve air quality. The report finds that, on a hot day, neighborhoods[2] with 25% canopy cover were 1 degree cooler than neighborhoods with no canopy. Industrial areas and major transportation corridors have lower canopy and warmer temperatures. These conditions were also found in some neighborhoods, such as in the Chinatown-International District and in the south end of Rainier Valley.

*"The data show we are further away now than we were five years ago from our goal of 30% canopy coverage**," said Jessyn Farrell, Director of Seattle's Office of Sustainability & Environment**. "To reverse this backward slide and achieve our vision of an equitably distributed urban forest in Seattle, our strategies must better align development and tree preservation and include innovative and equity-driven actions in planning, maintenance, planting, and engagement. In short, a healthy, thriving Seattle needs more housing and more trees and we can absolutely do both."*

2-7 cont

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[10] For example, of the well documented reduction in storm water runoff associated with mature tree canopy in urban areas, see:
US Environmental Protection Agency resources: Center for Watershed Protection, Swann, Chris; Review of the Available Literature and Data on the Runoff and Pollutant Removal Capabilities of Urban Trees; 2017.
Michael Richter *ORCID, Kirya Heinemann, Nadine Meiser and Wolfgang Dickhaut ; Trees in Sponge Cities—A Systematic Review of Trees as a Component of Blue-Green Infrastructure, Vegetation Engineering Principles, and Stormwater Management; Department of Environmentally Sound Urban and Infrastructure Planning, HafenCity University Hamburg;
"Trees reduce stormwater runoff and soil erosion through direct retention on leaves and branches when they become wet (interception), runoff of water via the trunk (stem runoff) and infiltration through the soil [20]. Additionally, substrates filter pollutants from stormwater before it infiltrates into groundwater"
Citing:
Elliott, R.M.; Adkins, E.R.; Culligan, P.J.; Palmer, M.I. Stormwater infiltration capacity of street tree pits: Quantifying the influence of different design and management strategies in New York City. *Ecol. Eng.* **2018**, *111*, 157–166.
Charles River Watershed Stormwater Association. Stormwater, Trees, and the Urban Environment. A Comparative Analysis of Conventional Street Tree Pits and Stormwater Tree Pits for Stormwater Management in Ultra Urban Environments. 2009.

City of Seattle, *"Seattle Releases 2021 Tree Canopy Assessment Showing Slow Decline in Canopy Cover Between 2016 and 2021",* Viewable at this link.

The Draft EIS also recognizes that mature tree canopy reduces pollution in runoff, which is toxic to fish, in addition to the benefits in regard to heat and climate resiliency.[11]

Much of the mature tree canopy and habitat in Seattle's residential neighborhoods, which are home to nearly 50% of the tree canopy despite being a much lower percent of the total land area, are evergreen trees. Evergreen, including Douglas Fir and Cedar, are documented to intercept 27 to 66% of precipitation (preventing that from reaching the ground to be rapid runoff).[12] This is far more than deciduous trees.

Seattle's existing native mature tree canopy has a far greater percentage of evergreen trees, which intercept and prevent stormwater runoff, than deciduous. However, tree replacement, especially street tree planting, is primarily deciduous and of much smaller canopy, resulting in a far greater relative increase in stormwater runoff. Preservation of mature tree canopy in residential areas is, therefore, necessary mitigation to accomplish the City's Tree Canopy, Climate and runoff goals and policies.

2-7 cont

HB 1181, Chapter 228, Laws of 2023 requires cities to incorporate climate change goals and elements in comprehensive plans. There is a concomitant requirement to address climate change impacts and related policies in the Environmental Impact Statement (EIS) accompanying the draft comprehensive plan.

RCW 36.70A.070(9) now requires that the City's Comprehensive Plan:

> 'must enhance resiliency to and avoid the adverse impacts of climate change, which must include efforts to reduce localized greenhouse gas emissions and **avoid creating or worsening localized climate impacts to vulnerable populations and overburdened communities."**

(emphasis added).

Neither the Plan nor the Draft EIS adequately consider how the loss of tree canopy, which has already been documented by the City, and which will accelerate under the proposed Plan, will result in increased "heat islands" and adverse health effects on vulnerable populations and overburdened communities from reducing tree canopy. Indeed, the Plan and EIS are required to have strategies to reverse the documented loss of tree canopy reflected in Seattle now being further from its goal than when the goal was adopted.

The Climate section of the draft Plan refers to a Climate and Environment Policy CE 9.3[13]:

> "Expand tree canopy and greenspace, especially in communities that experience disproportionate impacts of extreme heat and smoke events."

[11] Draft EIS Vol 3 Page 3.3-3.
[12] Center for Watershed Protection. 2017. Review of the Available Literature and Data on the Runoff and Pollutant Removal Capabilities of Urban Trees. Crediting Framework Product #1 for the project Making Urban Trees Count: A Project to Demonstrate the Role of Urban Trees in Achieving Regulatory Compliance for Clean Water; at 4.
[13] Plan at page 147.

As I quote the City's own findings, the City is losing tree canopy. Thus, a plan is required along with analysis of alternatives and mitigation measures to not only stem the loss but to "expand" tree canopy. No plan is presented.

The Tree Canopy section is devoid of any plan or meaningful discussion. Most notable, there is no plan or discussion relating to how the development goals will be coordinated with proactive policies to preserve and increase mature tree canopy in residential areas, where most of the tree canopy, and most of the risk for loss of canopy under the Plan will occur.

Policy CE 12.6[14] refers only to City property and street tights of way which cannot meet the goals:

> Preserve, restore, maintain, and enhance tree canopy on City property and rights-of way.

2-7 cont

Street trees offer far less of the benefits than large mature trees.

CE 12.8 recognizes this with a policy goal:

> Encourage the protection, maintenance, and expansion of tree canopy throughout the community, prioritizing residential and mixed-use areas with the least current tree canopy to equitably distribute benefits.

How will the City "encourage" protection, maintenance and expansion of tree canopy?

Mitigation is required for specific climate, environmental and human environment (including environmental justice) policies that are adversely impacted by competing policies.

The Draft Plan and EIS fail to adequately address that it is not possible to retain or replant trees when the land area is covered by new structures. The Seattle Comprehensive Plan should follow Portland's example by acknowledging that the only means of achieving 30-percent equitable citywide canopy cover is to designate at least 30% of the residential lot area with space for trees.

The DEIS discusses the in-lieu fee program which may result in increasing tree canopy in overburdened communities that currently have less than 25% tree canopy.[15] While this may provide vitally important benefits, cutting trees in one area while replacing them with new trees that require approximately $5,000 for their first four years of survival is untested and does not account for the reality that it would take many years for the new trees to provide the same net benefits of the cut trees. Nor does the City consider the reasonably foreseeable adverse impacts on the areas (and streams) that will lose tree canopy.

The Draft EIS and plan do not consider the reasonable alternatives for revising the City's Tree Ordinance, including measures which would assist in reaching the goal or reducing loss of canopy, such as applying the ordinance evenly to all areas / zones in the City.

[14] Plan at page 150.
[15] DEIS page 3.3-28.

The Draft EIS explicitly states that none of the alternatives considered include any proposal to improve regulation or incentives to reduce the pace of tree canopy loss, much less to reverse and make progress towards the goal of having 30% canopy coverage by 2037:

> Under any of the alternatives, the potential for adverse effects on plants and animals would be avoided, minimized, documented, and mitigated to the greatest extent possible through regulatory reviews and permitting processes that apply to individual projects (see Section 3.3.3). None of the alternatives propose any modifications to those processes.

Draft EIS Section 3.3.2 at page 3.3-13.

2-7 cont

The Draft EIS does not even acknowledge that many of the housing projects which might adversely affect the tree canopy retention policies will be exempt from further SEPA review under the City's adopted categorical exemptions. This will preclude consideration of area specific or cumulative impacts from multiple individual developments authorized under the Comprehensive Plan and Development Ordinances.

The Draft acknowledges the obvious: that the existing tree ordinance and policies are failing, as shown in the loss of canopy.

But, without any analysis, the DEIS asserts that the new tree ordinance will reverse this. However, the City refused to do an EIS or new analysis on the drastically revised ordinance that the Council passed. Thus, there is no analysis or basis for statements that the new ordinance will improve performance towards the goal. Further, the DEIS acknowledges that the new ordinance anticipates replacing mature canopy with street trees.[16] SEPA requires environmental analysis of the impacts – and mitigation measures – for such a switch since the record establishes that street trees cannot replace the heat, habitat, stream protection and stormwater benefits of mature trees.

To reflect the adopted Tree Canopy goal and required climate change element, and SEPA requirements for mitigation to achieve polices, the Comprehensive Plan and EIS should:

- explicitly include increased height bonuses or adding other residential unit area for preserving the entire tree canopy space required to keep existing significant trees healthy;
- include mitigation measures to apply the same tree protections and requirements for retention and permitting / review for removal by existing property owners to all new development in residential zones;
- adjust FAR ratios for each zone, to accommodate tree preservation;

[16] DEIS page 3.3-13 and 14: Stating that the existing tree ordinance "did not prevent development and redevelopment projects from contributing to tree canopy loss. After that study was completed, however, the City updated its regulations to implement stronger tree planting requirements and to require street trees to be planted as part of development in Neighborhood Residential zones. With the current regulations, it is expected that a substantial amount of development-related loss of tree canopy would be reversed over time as replacement trees grow larger. Since some tree placement would occur off-site through the fee-in-lieu option, this could also result in a shifting of canopy cover onto public property and the right-of-way where the City might have more control over tree establishment and maintenance." This is speculation without any analysis of the potential adverse effects or mitigation measures to ensure that the City would even meet its own expectations.

commit to requiring that the height bonus be utilized rather than merely being an option, as under current code, for developers to save significant trees by increasing development height or square footage elsewhere above what would otherwise be allowed to compensate for the area of the development reduced to ensure that significant trees on the property or adjacent properties are preserved and healthy.

E.g., developers of a five story building currently have a choice to remove a tree in the proposed building envelope, or to save the tree and add replacement footage. Mitigation and commitment to the Seattle Tree Canopy Goal and required Climate goal per HB 1181, Chapter 228 Laws of 2023, should result in the Plan and mitigation commitments under SEPA including this change which honors both increased housing unit goals and climate and tree preservation policies.

2-7 cont

- Provide examples of developments that meet increasing housing goals (including reflecting the requirement to allow various types of housing with four to six units per lot, depending on location) while preserving healthy existing mature trees on a development lot;
- Commit to adoption of an ordinance adjusting lot split and short plat lot lines to maximize preservation of existing mature trees as an element of required mitigation and commitment to the City's tree canopy and climate goals.
- Commit to increasing height for residential units in regional and neighborhood centers and expanding those centers along the entire arterials that have infrastructure completed or committed to for both light rail and bus rapid transit with the 800 foot walkable diameter zone (and fully consider on a local basis whether to expand each from three blocks / 800 feet to a quarter mile / five blocks with decreasing height and FAR moving away from the transit stop; and, couple this with the tree preservation mitigation elements above to prevent this expansion from adversely affecting climate resiliency due to loss of further mature tree canopy.
- Include consideration of potential mitigation requiring both street tree planting and small pedestrian or child friendly public access areas with larger shade trees within developments close to transit. Adjust the FAR to include increased height potential for meeting a required inclusion of plazas with trees, seating areas and play structures.

Park considerations: if the City moves to include specifically increasing height and housing units based on proximity to parks as an equity issue, then the EIS must address how increasing height and development FAR (requiring greater lot coverage) will impact natural habitat within the park boundaries. This must include mitigation measures to ensure that development close to park boundaries will not adversely affect either the tree root system or tree canopy habitat for trees within the park, habitat for birds and bats, light pollution in the park, the effect of shade and blockage of sunlight. The EIS would also have to address impacts from loss of sunlight and other impacts on parks that are primarily recreational. The consideration of increased density near parks should differentiate between natural areas and recreational areas (i.e., ball fields, courts, lawns, play areas).

Increased housing density that is explicitly based on increasing equitable access to parks should include a **change to HALA policies to require inclusion of affordable units of housing in new developments** taking advantage of increased density requirements. Equity and improving access to the benefits of parks requires adoption of policies to ensure that a significant number (20-25%) of housing units serve the City's goals to provide affordable housing for persons (and family units) at the <30%, < 60% and < 80% AMI levels.

Increasing the height and development potential (FAR) next to parks would be a windfall for developers. The value and market rent or sale value of units next to parks, especially with a view of preserved public park space, is far above that of other properties. If developers are going to be given such a potential windfall, there needs to be a requirement that a significant number of the units are dedicated to lower income residents and working families.

2-7 cont

Letter 3

From:	Pollet, Rep. Gerry
To:	PCD_OneSeattleCompPlan
Cc:	Moore, Cathy; Rivera, Maritza; Saka, Rob; Morales, Tammy; Hollingsworth, Joy; Strauss, Dan; rob.kettle@sattle.gov; Woo, Tanya; Nelson, Sara; Hubner, Michael; breenon.staley@seattle.gov; Holmes, Jim; Burgess, Tim; Emery, Adiam; Harrell, Bruce; Wong, Greg; Washington, Tiffany; Eder, Dan; Grupp, Emily; Gerry Pollet; patrice.caroll@seattle.gov
Subject:	Comments and proposals for Seattle Comprehensive Plan and follow-up
Date:	Sunday, May 5, 2024 11:12:32 AM
Attachments:	Comments on Seattle Comprehensive Plan and Draft EIS, Rep Gerry Pollet May 2024.pdf

CAUTION: External Email

Dear Mayor Harrell, Council Members, and the One Seattle Comprehensive Plan team:
Please find my detailed comments on the One Seattle Comprehensive Plan and Draft EIS attached. These supplement the joint comments submitted by a large number of my Seattle legislative colleagues. I join in that letter's offer to collaborate further on meeting our joint state and city goals.

In addition, I provide my own comments on key elements of the Plan and the draft EIS. Some of the highlights include:

- Urging adoption of an increased goal for housing units; and specifically calling out the need for the Plan to meet the requirements of HB 1220 (2021), now codified in RCW 36.70A.070(2). Those requirements are for the Plan to identify the needs for housing units for households at every economic / income level and plans for how the City will meet those needs
- Alternatives 2, 3 and 5 would result in approximately 20,000 more housing units over the next twenty years than the no action alternative base of 80,000; and Alternative 5 would produce an estimated 40,000 more units. Reductions in areas proposed for neighborhood centers, etc. would result in the proposed Plan only increasing the number of housing units projected for by 2045 from 80,000 to 89,000.[1]

  This meager increase is not the level of growth in housing units that my constituents and I believe is adequate or acceptable.

3-1

- Your administration worked closely with me to ensure that Seattle was not preempted from applying its own anti-displacement and affordable housing programs in housing legislation, such as for middle housing (HB 1110). I appreciated that close collaboration. Thus, I have been surprised in my extensive reading of the Plan and participating in several briefings, meetings and open houses to find that there is no meaningful discussion, *new* proposals or consideration in the Plan of appropriate policies to prevent displacement in the identified areas with high displacement potential for people /

3-2

- **The Plan and EIS fail to address new statutory requirements for consideration of climate change and environmental justice**. This includes failing to address the City's admitted **backsliding on Seattle's adopted goal to have 30% tree canopy by 2037**, and the documented impacts this has on human health and the environment for overburdened communities and vulnerable populations.

3-3

I believe my role as a legislator is to assist the City in meeting the goals set by City officials and our state's policies. I am available to meet and discuss concepts in the comments and how I can be of further assistance.

Gerry

Representative Gerry Pollet
46th District (Northeast and North Seattle)
Member: Appropriations, Education, Post-Secondary Education and Workforce

Development, Rules Committees
Executive Committee for Joint Legislative Audit and Review Committee

Please email me if you'd like to join one of my Saturday morning drop-in discussions "**Traveling Town Halls**." Notice is also posted on my website and FB page during the legislative session. I hold these most Saturdays from 9:30 -11am during Session since constituents shouldn't have to go to Olympia to see your Representative. From March-December, I will hold them one Saturday a month. Email me for dates and link or location, or to arrange a group meeting.

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[1] See Draft EIS Vol 3. 3 for an example of the summary of housing units for each alternative.

May 8, 2024

From: Joy Hollingsworth, Councilmember, District 3

To: Rico Quirindongo, Director, PCD

Cc: Brennon Staley, PCD
Michael Hubner, PCD

Director Quirindongo,

Our office has reviewed the Draft Environmental Impact Statement accompanying the Draft One Seattle Plan. We appreciate your department's incredible contribution to the success and health of the city. We know this plan will inform some of the most important decisions that our Council and our Mayor will make. 4-1

I do have several questions and I am requesting this feedback be incorporated into the final EIS.

The baseline and all alternatives plan for addition of 158,000 jobs in Seattle during the planning horizon. This suggests that for all alternatives, a varying number of people must live outside the city and commute in for work. As a result, the alternatives that result in fewer housing units constructed within the city would cause an increase in trips from outside of the city and vice versa, which has varying impacts.

- **Transportation –** The transportation analysis appears to only account for residents living within any given subarea and does not include the additional out-of-city trips and commutes caused by imbalance between job and housing additions. Alternatives that provide less housing in the city, likely cause more commutes and other trips into and out of the city limits. These commutes would be longer than any in-city commute. Non-work trips into the city would also be more frequent.

  Request: Please include in the analysis of each alternative the transportation impacts that are caused by the imbalance between the number of projected new jobs vs the projected number of new housing units, accounting for the implied trips caused by new in-city workers that necessarily live outside the city limits.

- **GHG Emissions –** Unlike criteria pollutants, greenhouse gas emissions are not locally toxic or harmful. Greenhouse gas management is solely a global collective 4-2

action problem. The DEIS appears to assume that the studied alternatives have no effect on GHG emissions outside of the city. It is important we know the true GHG impacts of the city's choices on the goal of preventing catastrophic climate change.

4-2 cont

When the city plans for 158,000 new jobs but not enough homes to house all those new workers, a number of new households will necessarily be formed outside of the city limits. Those households, across all their lifestyle choices and constraints, will likely have a carbon footprint, up to double that of a typical Seattle household.

Request: Please account for the changes to GHG emissions that result from the imbalance between housing increases and job increases in each of the alternatives. Please model changes in the carbon intensity from living in the city vs outside the city among the following: construction, transportation & car dependency, residential heating and cooling loads, and land-use intensity (i.e. changes in habitat destruction outside the city limits).

- **Plants & Animals –** While in-city tree canopy and plant coverage provide a wide variety of critical environmental and livability benefits to the city, the city's impacts on habitat outside the city limits are likely just as more impactful for the objectives of wildlife preservation, fish health, and environmental stability. Because some new households will necessarily be formed outside the city limits, those households will likely form in areas where each one consumes much more land for the housing itself as well as the supporting public and private services (e.g. roads, parking, and commercial shopping centers).

  4-3

  Request: In addition to analyzing the effects on tree canopy, habitat loss, and aquatic environmental health within the city limits, please also analyze the effects outside the city limits as implied by the jobs-to-housing deficits in each alternative.

- **Population –** When comparing the population distribution of Seattle versus the population distribution of Washington State, it is clear Seattle has far larger share of young adult, childless individuals than the State, and has a severe deficit of both children and middle-aged individuals. Similarly, when comparing households by income, Seattle has higher shares of high-income households and low-income households, with a significant deficit of middle-income households (50% - 150% AMI).

  4-4

  These demographic trends suggest that Seattle is failing to supply adequate housing for middle class households, and especially households with children.

Those households appear to have been displaced to elsewhere in the State. Alternatives that produce more family-sized housing would likely reduce this displacement and similarly plans that fully satisfy demand for single-member, middle income households would likely reduce the formation of roommate households, leaving more inventory for families.

Request: Please also analyze how each alternative changes the changes the supply of housing suitable for households with children as well as how they change demand pressure for the formation roommate households. Also, please evaluate how the impacts the supply of housing for middle-income households.

4-4 cont

Neighborhood Character

A significant concern I hear from District 3 residents is retaining neighborhood character while still growing. Most—if not all—Seattle neighborhoods have a significant supply of multifamily structures that were built either prior to the creation of Seattle's first zoning code in 1923, or prior to the major revision in 1957. These multifamily structures are definitionally part of the neighborhood character and beautiful charm of Seattle.

It is important that the Comprehensive Plan address neighborhood character concerns by allowing new multifamily structures that are similar to the historic multifamily structures that have existed since Seattle's neighborhoods were formed.

Request: Please ensure that the Final EIS not preclude zoning changes in the Comprehensive Plan that would bring all or substantially all the multiple family structures built prior to 1957 to conforming status in the zone they reside in as of April 18th, 2024, and/or legalize new multifamily structures of equivalent appearance, size, shape, floor area, height, position on lot, etc. To the extent additional EIS analysis is required, assume a street configuration and tree canopy in adjacent right of ways that is consistent with existing multifamily structures.

4- 5

Building Form

I have heard from many District 3 residents that we are seeing a lack of diversity in the forms of new housing being constructed in the city. Townhome construction is heavily represented in larger sized unit construction. The large number of stairs in townhomes

4- 6

provides significant challenges to individuals with mobility limitations, the elderly, and families with young children. Our city needs to provide incentives for stacked flats and larger apartment homes to meet the housing needs of these households.

Request: Please ensure that the Final EIS does not preclude future changes to the Comprehensive Plan that could be used to incentivize the construction of multifamily structures as alternatives to townhomes. Possible changes could be unit count bonuses, height bonuses, lot coverage increases, setback reductions, FAR bonuses, parking exemptions, height limit increases, and similar measures for the construction of small apartment buildings or stacked flats.

4- 6 cont

Thank you for your hard work preparing this DEIS, the draft One Seattle Plan, and your tireless efforts these last two months presenting the plan to the public. Your team has done a phenomenal job, and we look forward to working with you to bring the plan to reality for our community.

Joy Hollingsworth

District 3 Councilmember

Letter 5

April 26 2024

Jim Holmes, Office of Planning and Community Development
via e-mail to: PCD_CompPlan_EIS@seattle.gov

Re: Draft One Seattle Plan Draft Environmental Impact Statement Comment Letter

Dear Mr. Holmes,

The Seattle Planning Commission appreciates the opportunity to comment on the One Seattle Plan Draft Environmental Impact Statement (DEIS). The Seattle Planning Commission is a 16-member independent, advisory body. We provide guidance and recommendations to the City of Seattle's Mayor and City Council, as well as City departments, on planning goals, policies, and plans for the physical development of the City. We offer the following comments to help expand the environmental analysis and support the City in drafting a transformative Comprehensive Plan for Seattle. We have also provided comments on the Draft One Seattle Plan, which can be found here.

First, we want to highlight some aspects of the DEIS that we appreciate. We value the inclusion of the detailed historical context of housing in Seattle. The Land Use section provides a summary of the history and impacts of housing segregation, redlining, and exclusionary zoning in Seattle. The Population, Housing, and Employment section describes how a long history of under-production of housing has led to a housing shortage and how decades of discriminatory housing policy created an inequitable housing environment in Seattle. In addition to a well-written narrative of these past harms, the DEIS provides evidence of housing disparities by race, ethnicity, and income present in Seattle's housing market today that the One Seattle Plan must work to reconcile. The inclusion of this racial equity and historical harms lens provides an important grounding for the work of this Comprehensive Plan and we are glad to see it included to shape the discussion around housing and land use in the plan.

We also appreciate the City's multi-faceted approach to studying displacement in the DEIS. We recognize that displacement is a complex mixture of many different forces and choices that can be challenging to study. We are pleased to see the DEIS explore an expanded concept of displacement by studying potential causes and impacts of physical, economic, and cultural displacement.

Areas for Additional Analysis

We identified several areas for improvement, detailed as recommendations by topic below.

Commissioners
McCaela Daffern, *Co-Chair*
David Goldberg, *Co-Chair*
Xio Alvarez
Andrew Dannenberg
Matt Hutchins
Rick Mohler
Radhika Nair
Dhyana Quintanar
Julio Sanchez
Monika Sharma
Lauren Squires
Jamie Stroble
Kelabe Tewolde
Nicholas Whipple
Rose Lew Tsai-Le Whitson

5-1

Staff
Vanessa Murdock
Executive Director
Olivia Baker
Policy Analyst
John Hoey,
Senior Policy Analyst
Robin Magonegil
Administrative Analyst

Overall Recommendations

- Provide a detailed explanation for how the areas and place types are defined and selected.

  The Planning Commission would like to see a detailed explanation for how the areas and place types studied under each alternative are defined and selected. For example, it would be helpful to know more about how a corridor is defined. The Corridors alternative is described as focusing growth within a short walk of frequent transit, but more information is needed to understand the exact parameters. We would also like to learn more about the criteria used in the selection of Neighborhood Centers and how those analyzed were narrowed down from the original list of Neighborhood Centers in the EIS Scoping Report.

- Provide a more complete exploration of how the alternatives reduce racial disparities throughout the DEIS.

  The DEIS summary indicates that equity is one of the main objectives of the major update. Each section of the DEIS analysis includes an equity impact section, yet many of these discussions focus on income disparities and do not include an exploration of disparate impacts by race or ethnicity. While themes of racial equity are explored at a high level throughout the document, these themes are not carried through to the detailed analysis by alternative and by study area. The application of this lens is inconsistent throughout the document. For example, the Race and Social Equity Index is mentioned in the Transportation chapter, but not in the Housing chapter. The DEIS should use the already established Race and Social Equity Index maintained by the City to conduct an equity analysis for each topic area that recognizes the complex and intersectional nature of equity concerns in Seattle.

5-2

- Include an analysis of Seattle's emergency preparedness and response for major earthquakes.

  The EIS should include a study of how the updated Comprehensive Plan and the proposed growth strategy interact with the City's existing emergency preparedness and earthquake preparedness and response plans. It is not a matter of if, but a matter of when Seattle will experience a major earthquake and the EIS should analyze whether the City is prepared to handle such an emergency as Seattle plans to accommodate more people and changes to the built environment. Mitigation measures should be proposed if the analysis shows existing emergency plans fall short in preparing for growth.

- Inclusion of the 130th/145th Street Station Area in this larger EIS adds confusion.

  The summary of potential impacts in the 130th Street and 145th Street station areas does not appear to provide a full analysis of these two new station areas. For example, it may be confusing to the public that impacts on these station areas are only studied for Alternatives 2 and 5, because it is assumed that the station area plans would not be applied under the other growth strategies. While the attempt at efficiency by including these in the DEIS is appreciated, the Planning Commission recommends completing these studies separately from the One Seattle EIS.

- Study the Planning Commission's recommendations (found here) on the draft One Seattle Plan, specifically those related to Growth Strategy, Land Use, Housing, Transportation and Climate and Environment in the Final EIS

The Commission requests the study of recommendations, when not addressed in the DEIS, in the Final EIS to assist decision makers in determining the best path forward in the City's plan for sustainable and equitable growth. This includes analyzing Accessory Dwelling Units as a unique housing type not likely to be fully built out across the city in all areas and providing a housing option for a select number of people/households. 5-2 cont

Air Quality and GHG Emissions

- Study the impacts of locating sensitive uses near additional high-volume traffic roadways beyond the freeways.

  We appreciate that the DEIS provides a detailed explanation of the criteria pollutants studied and their potential impacts, such as how PM2.5 can increase the risk of cardiovascular and respiratory problems. The DEIS also notes the risks associated with locating sensitive uses (residential, daycare, schools, etc.) next to major roadways and rail lines. Due to these risks, the DEIS shows what a 1000-foot buffer around freeways through the City would look like and what uses are currently in these buffer areas. The DEIS does not, however, discuss the potential air quality impacts of large arterials like Aurora Ave N or MLK Way S, which also move large volumes of cars through the city. Additionally, the DEIS does not draw a connection between the impacts of locating sensitive uses such as housing along roadways and the Corridors strategy in Alternative 4, which would focus housing growth along such roads. 5- 3

  The land use decisions made today can have long-term impacts for the health of future Seattle residents. Uses such as housing and schools, which require large amounts of land, can be challenging to site through the permitting and building process, and will likely be used for the next 50 to 100 years. The City should study the impacts on sensitive uses near other high-capacity roadways and arterials beyond just the freeways, especially if policy will be developed to apply the mitigation measures identified in the DEIS, such as additional ventilation or air purification requirements, near studied pollution sources.

Land Use Patterns & Urban Form

The Planning Commission appreciates inclusion of a thorough summary of the history and impacts of housing segregation, redlining, and exclusionary zoning in Seattle. This section provides important background and context for the analysis of impacts and proposed mitigation.

- Provide more detail and context on negative land use impacts and the consequences of those impacts. The land use impacts analysis emphasizes the following potential negative impacts: 5- 4

  - Increased frequency of areas with mixing of uses and heights.
  - Different land use types locating close to one another.
  - Land use patterns that contain mixes of land uses with differing levels of intensity.

  This analysis is general across all the action alternatives and does not adequately describe the rationale for why these impacts are negative and what the consequences of these negative impacts are. Similarly, the impacts analysis states that redevelopment would create a potential for localized adverse

compatibility issues and sharper transitions. This analysis is general across all the action alternatives and does not adequately identify the consequences of these negative impacts.

- Emphasize that negative impacts resulting from urban growth are expected and only temporary.

  The DEIS repeatedly uses language describing the potential negative impacts of height, bulk, scale, and transitions that is likely to be of concern to residents in existing low-density neighborhoods. The mitigation analysis states that these impacts would be temporary as an expected characteristic of urban population and employment growth and will be resolved over time. To alleviate the concerns of neighboring residents, it should be emphasized that no significant unavoidable adverse impacts to land use patterns, compatibility, or urban form are expected under any of the alternatives.

5- 4 cont

- Highlight both positive and negative equity impacts.

  The Planning Commission appreciates the inclusion of Equity and Climate Vulnerability Considerations in the impacts analysis for each of the alternatives. This section discloses both positive and negative equity issues for a range of populations. We applaud identification of increasingly negative impacts on people living along inhospitable arterials with unhealthy traffic impacts, such as safety, air quality, and noise, in the Relationship to Social Wellbeing and Sociability section. We also appreciate the discussion of positive equity impacts related to increased density in the action alternatives, including more equitable impacts to housing choice, a more varied urban form, more opportunity for vibrant neighborhoods, and opportunities for more multifamily housing. Lastly, we appreciate the identification of the positive relationship between intensifying land use and opportunities for increasing active transportation. Increased density across all neighborhoods in Seattle would allow more people to live in walkable and bikeable communities with improved access to transit.

- Include additional mitigation measures in areas of the city subject to sea level rise.

  Encouraging growth in areas subject to sea level rise, such as South Park, should be accompanied by policies committing to investments and building requirements in those parts of the city.

Population, Housing, and Employment

- Provide additional employment analysis related to the changing nature of work location post-pandemic.

  The DEIS should do more to explore impacts and changes to work location and employment opportunity across alternatives. The DEIS assumes the pattern of job growth in Seattle will remain largely the same as current patterns regardless of the growth strategy selected. The DEIS does not explain why this assumption is made nor does it consider the changing nature of work location due to the increase in remote work and the shifting climate of work post-pandemic. We recommend the City provide further analysis of how different land use configurations in the alternatives may influence job location and acknowledge that employer location may differ from worker location for some employees, creating different travel patterns and consumer patterns within and across neighborhoods.

5- 5

- Study how each alternative may support or hinder the implementation of anti-displacement policies in the draft plan beyond just Mandatory Housing Affordability (MHA).

The DEIS provides a strong exploration of the historical context of housing in Seattle and displacement pressures in the city and we appreciate the inclusion of this context. The DEIS also attempts to break down and explain displacement occurring in the city through exploration of physical, economic, and cultural displacement but lacks enough data to provide a clear picture of how each alternative would impact displacement in high-risk areas of the city. We recognize that displacement is a complex topic that is challenging to study, and we think the following suggestion could help provide a more complete picture.

5- 5 cont

To provide further analysis of how the One Seattle Plan can impact displacement, the EIS should study how each alternative growth strategy may support or hinder the implementation of anti-displacement policies beyond just MHA. For example, the EIS could provide an analysis of the displacement strategies explored in the draft plan which include allowing only three units in Neighborhood Residential zones in high displacement risk areas rather than four units in low-risk areas. The EIS could also include a discussion of how other efforts might be impacted, like projects supported by the City's Equitable Development Initiative or community land trusts operating in the City. Providing a direct comparison between each alternative and the Displacement Risk Index would also help strengthen this analysis.

- Study the impact of each alternative on housing affordability and supply more deeply.

  The current housing analysis in the DEIS looks at housing affordability through a generalized, high-level discussion. The EIS should go deeper and explore the potential AMI levels served by the types of housing allowed under each alternative. The analysis could also discuss the economic feasibility of building different housing types that the plan hopes to encourage, such as middle housing and more affordable ownership options, under each alternative.

  The EIS should also clearly identify how the supply of housing will be impacted if the housing target for each alternative is achieved. The analysis should consider what types of housing can be built under each alternative and how that aligns with the housing needs identified in Exhibit 3.7-4 Net New Housing Units and Emergency Housing Needed, 2019-2044. For example, looking at Alternative 1, if you add up the housing units needed for all categories of housing serving households at 80 percent AMI and below, the need is over 50,000 units. How does the supply of housing expected under Alternative 1 align with these stated needs for low-income housing units? The EIS should study how the supply of housing units anticipated in each alternative stacks up against the stated housing need at each income level. Additionally, how do policies proposed in the draft plan, such as only allowing up to three housing units per lot in high-displacement risk areas, impact the anticipated supply of housing?

- Include a discussion of how each alternative impacts housing choice in areas of high opportunity.

  The EIS should include an analysis of housing choice in areas of high opportunity for each alternative. The City previously created an Access to Opportunity Index that explores how different areas of the city compare in terms of access to resources such as high-performing schools, jobs, parks, and stores with fresh produce. The DEIS discusses the legacy of harm created by past planning policies that prevented low-income households and households of color from living in certain areas of the city. The EIS should have a more nuanced discussion of where each alternative increases housing options in the city and to what extent the alternatives address that legacy of harm. The analysis should consider where each alternative creates new housing relative to the Access to Opportunity Index and who will be able

to afford that housing. The DEIS should examine how the alternatives compare in the effort to change existing patterns of racially disparate housing outcomes in Seattle's housing market.

Transportation

- Describe the relationship between transportation analysis for this DEIS and the Seattle Transportation Plan.

  The Planning Commission would like to better understand the relationship between the transportation impact analysis conducted for the One Seattle Plan DEIS and similar analysis conducted for the Seattle Transportation Plan (STP). We understand that the STP used the One Seattle Plan's Alternative 5 growth strategy for its baseline to determine transportation impacts. However, it is our understanding that the One Seattle Plan used existing land use conditions as the baseline for its transportation impact analysis. 5- 6

  The DEIS states that the action alternatives are expected to result in higher vehicle miles traveled (VMT) than the No Action Alternative due to increased growth levels. The impact analysis also states that all the action alternatives are expected to have significant impacts to transit passenger load, corridor travel time, intersection level of service in the NE 130th/NE 145th Street Subarea, and state facilities. The proposed mitigation measures include targeted transportation capacity improvements; bicycle, pedestrian, and freight connections; and demand management using policies, programs, and investments aimed at shifting travel to modes other than single occupant vehicles. While we are supportive of these mitigation measures, we would like more information on whether these mitigation measures are consistent with those proposed in the STP.

- Proposed mitigation measures should be inherent to development of a citywide transportation system.

  The Planning Commission appreciates identification of specific negative impacts in the equity discussion, including the following:
  - Underserved communities often face the highest effects of vehicle emissions.
  - Freight traffic emissions or poor air quality due to proximity of housing to heavily congested roadways and freeways.
  - Increased population in areas with low sidewalk connectivity.

  We are very supportive of all the proposed mitigation measures, including pedestrian and bicycle system improvement, transit strategies, parking management, and safety strategies. These transportation programs and investments should be essential components of a citywide transportation system even in the absence of the perceived negative impacts of growth described in the DEIS.

- Provide more information on significant unavoidable adverse impacts to transit capacity.

  The DEIS states that significant unavoidable adverse impacts to transit capacity are expected from the action alternatives. We would like more information on the potential magnitude of this impact and the consequences for regional transit agencies. These documented impacts could serve as an opportunity for our regional transit agencies to plan for significant expansion of capacity to meet the need.

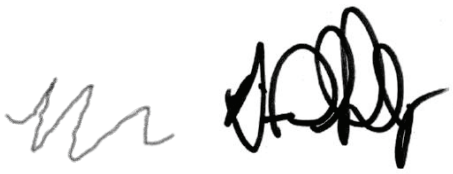
- Results of the impact analysis should be presented in terms that are accessible to lay audiences.

  The Planning Commission applauds the comprehensive nature of the detailed analysis of transportation impacts, but the results are presented in jargon and technical terms that could be difficult for lay audiences to understand. The language and overall communication of the analysis could be improved to be more easily digestible for comprehension by the public.

5- 6 cont

Thank you for your consideration of our comments and recommendations and please do not hesitate to contact us or our Executive Director, Vanessa Murdock, at vanessa.murdock@seattle.gov should you have any questions.

Sincerely,



McCaela Daffern and David Goldberg
Co-Chairs, Seattle Planning Commission

Cc: Mayor Bruce Harrell
Marco Lowe, Christa Valles; Office of the Mayor
Seattle City Councilmembers
Rico Quirindongo, Michael Hubner; Office of Planning and Community Development

DISCLOSURES/RECUSALS:
Co-Chair McCaela Daffern works for King County and has recused herself from review of the Seattle Comprehensive Plan in her role at King County. She disclosed that her opinions are her own, not her employer's.
Commissioner David Goldberg disclosed his views are his own and not those of his employer, the Washington State Department of Transportation.
Commissioner Xio Alvarez disclosed her views are her own and not those of her employer, LMN Architects.
Commissioner Rick Mohler disclosed his views are his own and not those of his employer, the University of Washington
Commissioner Radhika Nair disclosed her views are her own and not those of her company, Seva Workshop. While she has worked on many City projects, she has not worked on this draft Plan.
Commissioner Dhyana Quintanar disclosed that her views are her own, not those of her employer, WSP.
Commissioner Lauren Squires disclosed that her opinions are her own, not those of her employer, King County Metro.
Commissioner Jamie Stroble disclosed that she worked with one of the community-based organizations funded by the City to provide input on the One Seattle Comprehensive Plan. She

disclosed that her opinions are her own, not those of any present (the Nature Conservancy) or former employer.

Commissioner Rose Lew Tsai-Le Whitson disclosed that their opinions are their own, not those of their employer, Jacobs Engineering.

Letter 6

STATE OF WASHINGTON

DEPARTMENT OF COMMERCE

1011 Plum Street SE • PO Box 42525 • Olympia, Washington 98504-2525 • (360) 725-4000
www.commerce.wa.gov

May 20, 2024

Michael Hubner
Long Range Planning Manager
One Seattle Plan Project Manager
Office of Planning and Community Development
PO Box 94788
Seattle WA 98124-7088

Sent via electronic mail to Michael.hubner@seattle.gov

RE: Comment Letter for Submittal ID 2024-S-6934 – City of Seattle Draft Comprehensive Plan, Draft Environmental Impact Statement, and SEPA Infill Exemption

Dear Michael:

Thank you for the opportunity to comment on the City of Seattle's proposed draft 2024 comprehensive plan, draft EIS (DEIS), and notice of SEPA infill exemption received on March 11, 2024. Growth Management Services processed the final documents with material identification number 2024-S-6934.

Your submission represents a great deal of work and substantial progress towards the 2024 periodic update of your comprehensive plan due December 31, 2024. We especially appreciate the extensive work conducted on the city's public outreach and engagement process and applaud you on what appears to be a robust public participation plan!

6-1

As part of our review, we referenced the draft One Seattle Plan Update (2024) and DEIS. We have focused our review on the following comprehensive plan elements, and offer respective comments and/or suggestions as follows:

1. Land Use

    a. Based on our review, it appears the land use element does not include population projections as required by the Growth Management Act (GMA). Per RCW 36.70A.070(1), "The land use element shall include population densities, building intensities, and estimates of future population growth". To better align with statute, we recommend including a population projection in your Land Use Element and, for consistency, throughout other elements in your comprehensive plan.

    b. The city shall adopt a comprehensive plan and development regulations that are consistent with and implement the comprehensive plan, per RCW 36.70A.040. It appears that development standards with which to implement the comprehensive plan elements, policies and goals are not yet available, or are incomplete. Please provide a draft of all associated development regulations

and zoning updates for the One Seattle Plan draft comprehensive plan so that it may be reviewed for consistency with the Growth Management Act (GMA), RCW 36.70A.106. 6-1 cont

2. Housing

a. The Growth Strategy and draft land use element include policies on moderate density housing options (e.g. duplexes, triplexes, etc.), however, these policies do not appear in the draft housing element, per RCW 36.70A.070. Please consider including a policy on a variety of moderate density housing types in the Housing Element as well.

b. The draft comprehensive plan does not provide supporting documentation indicating sufficient land capacity for emergency housing and emergency shelter, per RCW 36.70A.070(2)(c). While Commerce guidance indicates jurisdictions do not need to complete a land capacity analysis (LCA) for emergency housing and emergency shelter if they allow these uses in all zones that allow hotels, RCW 36.70A.070(2)(c) states jurisdictions must ensure sufficient capacity for all housing types, including emergency housing and emergency shelter, are identified in the housing element. Therefore, we recommend the city consider including this information in the final LCA. 6-2

c. We appreciate the analysis you completed for the "Housing Production Barriers and Actions" section as well as the policies in your draft housing element addressing these barriers. However, the strategies identified in the "Actions to Address Barriers" section do not appear to clearly address barriers to housing across *all* income levels, particularly deeply affordable housing, emergency housing and permanent supportive housing, per RCW 36.70a.070(2)(d)(i) and (ii). We encourage you to expand your analysis of barriers to affordable housing and develop a detailed list of actions to remove these barriers. Completing this exercise can help guide your work over the coming years, including your required five-year implementation progress report (RCW 36.70A.130(9)). For more information, please refer to "Chapter 4. Adequate provisions" and checklists in Appendix B in Book 2.

d. We applaud the "Historical Context of Racist Housing and Land Use Practices" and "Geographic Analysis of Racial and Social Equity in Housing" sections provided in your draft documents. The Housing Appendix could be improved by including a review of housing element policies that have led to racially disparate impacts. For more information, see "Step 3. Evaluate Policies" in the Racially Disparate Impacts Guidance (Book 3).

3. Transportation

a. A transition plan for transportation, as required in Title II of the Americans with Disabilities Act (ADA), is required in the city's transportation element**.** Local governments are required to perform self-evaluations of current facilities and develop a program access plan to address deficiencies and achieve the identification of physical obstacles, establish methods, perform modifications and identify leadership roles. RCW 36.70A.070(6)(a)(iii)(G), new in 2023**.** Please add this item to the One Seattle Comprehensive Plan. 6-3

b. A transition plan as required by HB 1181 is not required until the 5 year check-in. However, it appears that that the city intends to comply with the climate requirements (multimodal levels of service standards and vehicle miles traveled reduction strategies), therefore we recommend the city include a transition plan sooner, rather than later, to guide your work over the coming years, including your five-year implementation progress report (RCW 36.70A.130(9)(a).

c. It appears that a description of existing and planned transportation demand management (TDM) strategies, such as HOV lanes or subsidy programs, and parking policies, is not included in the transportation element, per RCW 36.70A.070(6)(a)(vi) and WAC 365-196-430(2)(i). Please ensure a detailed description of each of the demand management strategies is included in the final One Seattle Plan Update (2024).

d. If probable funding falls short of meeting identified needs of the transportation system, including state transportation facilities, a discussion of how additional funds will be raised, or how land use assumptions will be reassessed to ensure that LOS standards will be met is required. (RCW 36.70A.070(6)(a)(iv)(C) and WAC 365-196-430(2)(l)(iii)). There is mention of this in the funding investments section and land use assumption discussion in the appendix. However, we recommend you add a more detailed discussion on how additional funds will be raised and how land use assumptions will be reassessed. 6-3 cont

e. There appears to be minimal language in the plan concerning compatible airport siting. General aviation airports are essential public facilities. We recommend expanded discussion on appropriate compatibility, high intensity uses, airspace and height hazard obstruction, noise and safety issues, and other issues unique to each airport, such as topography and geography, per RCW 36.70.547.

4. Capital Facilities

a. An Inventory of existing capital facilities indicating their respective locations and capacities does not appear to be included in the draft "One Seattle Plan – Comprehensive Plan Update" as required by RCW 36.70A.070(3)(a). While there is an "Appendices" section listing the names and contents of said appendices, the appendices are not included for review. Please provide the "Capital Facilities Appendix" so it may be reviewed for consistency with the Growth Management Act (GMA). See WAC 365-196-415(2)(a) for additional guidance pertaining to GMA requirements for the capital facilities inventory.

b. A forecast of future needs for capital facilities during the planning period do not appear to be included in the draft "One Seattle Plan – Comprehensive Plan Update" as required by RCW 36.70A.070(3)(b). Please provide the "Capital Facilities Appendix" so it may be reviewed for consistency with the Growth Management Act (GMA). See WAC 365-196-415(2)(b) for additional guidance pertaining to GMA requirements for the capital facilities forecast of future needs. 6-4

c. Proposed locations of expanded or new capital facilities appear to be addressed in the adopted 6-year Capital Improvement Plan (CIP), however, the capacities of said expanded or new capital facilities are not provided as required by RCW 36.70A.030(3)(c) and WAC 365-196-415(1)(c) and (3)(c). We recommend an amendment to the CIP to include capacities of expanded or new capital facilities. We also want to note that infrastructure investments should consider equity and plan for any potential displacement impacts.

d. The draft capital facilities element does not appear to include a policy or procedure to reassess the land use element if probable funding falls short of meeting existing needs as required by RCW 36.70A.070(3)(e). We recommend adding a policy or procedure to reassess directly in the capital facilities element as required by statute. See WAC 365-196-415(2)(d) for additional guidance.

5. Utilities Element

    a. An inventory of existing utilities consisting of the general location, proposed location, and capacity of all existing and proposed utilities does not appear to be included in the draft "One Seattle Plan – Comprehensive Plan Update" as required by RCW 36.70A.070(4)(a). While there is an "Appendices" section listing the names and contents of said appendices, the appendices are not included for review. Please provide the "Utilities Appendix" so it may be reviewed for consistency with the Growth Management Act (GMA). See WAC 365-196-420(2)(a) for additional guidance pertaining to GMA requirements for the utilities element inventory. 6- 5

Thank you again for the opportunity to comment. If you have any questions or concerns about this letter, or any other growth management issues, please feel free to contact me at (360)280-3147 or catherine.mccoy@commerce.wa.gov. We extend our continued support to the City of Seattle in achieving the goals of the GMA.

Sincerely,

Catherine McCoy
Senior Planner
Growth Management Services

CM:lw

cc: David Andersen, AICP, Senior Managing Director, Growth Management Services
Valerie Smith, AICP, Deputy Managing Director, Growth Management Services
Benjamin Serr, AICP, Eastern Region Manager, Growth Management Services
Carol Holman, MUP, Western Region Manager, Growth Management Services
Anne Fritzel, AICP, Housing Programs Manager, Growth Management Services
Brennon Staley, Strategic Advisor, Growth Strategy Lead, Seattle Office of Planning & Community Development
Jim Holmes, EIS Lead, Seattle Office of Planning & Community Development

Letter 7

From: JT Cooke
To: PCD_OneSeattleCompPlan; PCD_CompPlan_EIS
Subject: Seattle One Comments
Date: Tuesday, May 7, 2024 12:06:03 PM
Attachments: 2024.5.7 Seattle One Comment letter.pdf

CAUTION: External Email

Hello,

Please see the attached comments.

Thank you,

JT

HOULIHAN LAW
100 N. 35th Street • Seattle, WA 98103

JOHN T. (J.T.) COOKE
ATTORNEY

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7-1

NOTICE: This communication may contain privileged or other confidential information. If you have received it in error, please advise the sender by reply email and immediately delete the message and any attachments without copying or disclosing the contents. Thank you.

7-1

HOULIHAN LAW
100 N. 35th Street • Seattle, WA 98103

JOHN T. (J.T.) COOKE
ATTORNEY
JT@HOULIHAN-LAW.COM

May 7, 2024

VIA Email: OneSeattleCompPlan@seattle.gov; PCD_CompPlan_EIS@seattle.gov

RE: One Seattle Plan and Draft Environmental Impact Statement

Dear:

We represent Blue Rooster Building East, LLC ("BRB") the owner of real property located at 1300 N. Northlake Way, in Seattle Washington ("BRB Property"). Thank you for the opportunity to comment on the One Seattle Plan ("Plan") and Draft Environmental Impact Statement ("DEIS").

The City Needs to Reconsider the 20-Year Incremental Planning Horizon When Strategizing for Growth

The Plan does not go far enough to address the current housing deficit and future demand. Past comprehensive planning has not kept up with actual demand. This is part of the cause for the housing deficit in the City. The City needs to rethink the incremental planning approach to meeting the City's housing needs. That approach has led to lower density development in areas where higher density development is needed now. The current plan continues the same failed approach to development. 7-1 cont

The problem with the incremental (or step-up) approach to accommodating population growth over 20-yar horizons is that developed property stays developed well past the 20-year planning horizon the City uses. Thus, when the City updates its plans and development regulations to achieve more density to meet projected demand, that density is often not is not capable of being realized where it is desired because land that has been designated for higher density development has already been developed under more restrictive development regulations.

The Seattle One Plan and DEIS Should Assess Expanding The Fremont Hub Urban Village Boundaries (or Urban Centers) to Incorporate Underutilized or Undeveloped Properties

None of the alternatives, as far as we can tell, assess expansion of the boundaries of the Fremont Hub Urban Village (which will be renamed Urban Centers) as an alternative. This is a missed opportunity. Urban Villages allow for higher density development and are generally centered around core services like transit and employment centers. Most of the land in these areas is already developed and is not likely to be redeveloped during the current planning cycle. There are, however, underutilized or undeveloped 7-2

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properties on the periphery of the existing boundary of the Fremon Hub Urban Village that will likely be redeveloped during the next 20-year planning cycle. The City cannot afford to miss the opportunity to maximize development of these parcels.

For example, BRB's property at King County Parcel 4088804710 is located just outside the current Fremont Hub Urban Village. The parcel is underutilized and will likely be redeveloped during the next planning cycle. Expanding the urban village boundary to include properties like this one will help the City meet the current housing deficit and future housing demands by allowing higher density development.

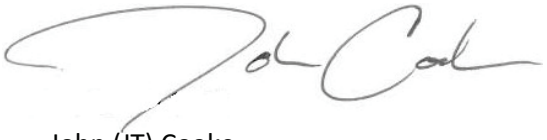
7-2 cont

Alternative 4 and 5 Are the Alternatives that will Most Likely Achieve Required Housing Density

Alternatives 4 and 5 are most likely to achieve the City's long-term housing needs. As noted above, under-utilized or undeveloped properties are the properties that are most likely to see redevelopment in the next twenty years. Alternatives 4 and 5 are the only alternatives that capture large portions of the City and are most likely to capture properties that will be developed over the next twenty years.

Thank you for considering these comments.

Sincerely,



John (JT) Cooke
Attorneys for Blue Rooster Building East LLC

Cc: Client (via email)

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Letter 8

Vulcan Real Estate

May 6, 2024

Office of Planning & Community
Development
Attn: Jim Holmes, Strategic Advisor
City of Seattle
P.O. Box 94788
Seattle, WA 98124-7088

Via Email

Re: *Combined Comments on Draft Environmental Impact Statement and the Draft One Seattle Comprehensive Plan*

Dear Mr. Holmes:

Thank you for the opportunity to comment on the draft One Seattle Plan (the "Draft Plan") and the associated Draft Environmental Impact Statement ("DEIS"). We recognize and appreciate the tremendous amount of time and energy that the City and its team have devoted to preparing the Draft Plan and DEIS, and are pleased to offer our comments in support of a strengthened final product that will maximize our city's housing and jobs potential.

Vulcan Real Estate ("Vulcan") is a Seattle-based developer focused on providing positive impacts on Seattle and its greater region through successful, inclusive development and management of technology and life science workspaces, as well as residential and mixed-use projects. We are proud of our sustainability- and community-focused engagement in every aspect of development in this region, from acquisition and financing through development, construction, marketing, leasing, and management. To date, we have delivered more than 13.6 million square feet, leased more than 10.2 million square feet to some of our region's biggest and most innovative employers, and retain 5.2 million square feet under management. We are deeply invested in the Pacific Northwest, and have industry-leading expertise in sustainable and forward-thinking office and residential development. 8-1

Vulcan knows what it takes provide dense, modern, transit-oriented housing supply and commercial space. We support the vision articulated in the Draft Plan for a Seattle with new housing opportunities, complete walkable communities, climate resilience and more equitable outcomes. We also believe that under the leadership of this Mayor, Council, and Office of Planning and Community Development, the City can go even farther to support steady housing and job growth over the next two decades. With that in mind, we offer the following comments on the Draft Plan and DEIS.

A. The Final Plan and EIS Must Provide Further Analysis of Sound Transit's Plans and Should Articulate the City's Preferred Direction in Order to Maintain South Lake Union as a Thriving Jobs Center.

The Draft Plan identification of South Lake Union as a Regional Center, with the assumption that it will provide 25,000 new jobs over the next two decades. However, we are deeply concerned that Sound Transit's plan for a Denny Station "Shifted North" at Westlake Avenue and a South Lake Union Station at 7th and Harrison as part of the West Seattle Ballard Link Expansion ("WSBLE") would have major adverse impacts on the neighborhood, including multi-year closures on Westlake Avenue and other major streets, deeply challenging the City's ability to achieve its goals for new job opportunities in this Regional Center. Expansion of regional transit infrastructure by Sound Transit presents an incredible opportunity to move people to and through Seattle, and will be a significant asset to the City—but only to the extent that the infrastructure is designed and implemented strategically to avoid adverse outcomes. 8-2

The Final Plan should enumerate a specific Policy of partnering with Sound Transit to deliver new stations and alignments in locations *that meet the City's goals* for job and housing growth and minimize impacts. The FEIS must also study the potential job and housing impacts from multi-year closures of key arterials like Westlake and others throughout the City's Regional and Urban Centers to fully understand the cumulative impacts of the Draft Plan and Sound Transit's light rail expansion.

B. The Final Plan and EIS Should Identify a Higher Level of Job Growth to Ensure a Thriving Economy.

The Draft Plan and all DEIS Alternatives—including the "no action" Alternative—assume that only 159,000 new jobs[1] will be created in Seattle over the next two decades, which is far less than the 175,000[2] jobs that Seattle grew in the one decade between 2010 and 2020. The DEIS's assumed job growth number is based solely on the City's regionally identified growth target, without any apparent analysis of what level of job growth is actually likely (or needed) for Seattle's thriving economy. The Plan shouldn't just assume job growth will occur exactly as targeted—instead, it should center the Plan around strategies for Seattle to flourish economically. 8-3

Further, although we strongly support the Draft Plan's vision for providing 30% of job opportunities in our Downtown Core, the Draft Plan and DEIS do not identify any different strategies or mitigation measures to help achieve that goal. Similarly all DEIS alternatives show from 63-65% of new jobs opportunities in Regional Centers, without explanation of how that job growth will actually be achieved.[3] Since COVID, the City has seen significant public safety issues in Downtown and South Lake Union, and Downtown office vacancy is expected to reach 30% in the near term. We commend the Mayor, his Administration, and the newly seated Council for their progress on these issues through the Downtown Action Plan, but a longer-term

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[1] The DEIS appears to state 158,000 jobs and the Draft Plan states 159,000 jobs, but we assume this is a minor error that will be corrected.

[2] Draft Plan at 4.

[3] DEIS Exhibit 3.8-5.3.

vision must also be articulated to ensure robust job growth in the City's densest areas for the next two decades. We specifically request:

1. The FEIS identify the necessary increases in job growth to ensure a thriving Seattle economy, which we believe are much greater than the regional growth target number, and identify how differences in the zoning strategies articulated (including changes in height, bulk and scale) in each Alternative will impact the amount of job growth, especially in Regional Centers.

2. The Final Plan and EIS each identify specific strategies and mitigation measures the City can use to attract and retain employers, and enhance economic growth.

3. The Final Plan and EIS each support additional flexibility in ground-level uses in all Regional Centers to counter ground-level retail vacancy and encourage eyes on the street.

8-3 cont

C. The Final Plan and EIS Should Take a Bolder, Clearer Approach to Zoning Changes in Regional Centers and Urban Centers, While Recognizing the Benefits of Neighborhood Centers.

The Draft Plan recognizes that Regional Centers are the areas likely to accommodate the greatest amounts of new density, both in terms of housing units and employment opportunities.[4] But in order for the Mayor's Recommended Plan to be truly *comprehensive*, it should include more information about envisioned increases in density in these areas. Baseline density changes should occur in the near term as part of Plan implementation, and not only through future Subarea planning.

The Final Plan should incorporate, and the FEIS should fully study, zoning to allow heights of at least 85 feet (or 95 feet for mass timber construction) and 5.75 FAR for all areas in Regional Centers, and heights of no less than 240 feet and 8 FAR for all of Downtown (including Belltown) and South Lake Union, as well as for any areas within an 800-foot radius of existing and future light rail stations. Setting this zoning baseline will help maximize the potential for housing and jobs in Regional Centers. In addition, Subarea planning for Regional Centers should be accelerated. All of these changes will help release properties from regulatory uncertainty, freeing them to be developed as soon as market conditions allow.

8-4

Likewise, the Draft Plan is very vague regarding future zoning changes in Urban Centers, *even though Urban Centers are not anticipated for future Subarea planning*. These areas are critical density hubs, and both the final Plan and FEIS should devote additional attention and clarity to baseline zoning changes that should occur. At a minimum, the Final Plan should include and the FEIS should thoroughly study zoning for a baseline allowed height of 85' and FAR of no less than 5.75 in all Neighborhood Commercial ("NC")or Seattle Mixed zoned land in Urban Centers, along with density increases in lower zoning designations.[5] This will maximize the potential to build the midrise housing projects that will do the most to alleviate our housing supply crisis.

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[4] *See*, *e.g.*, DEIS at 1-65 ("in all Alternatives, a majority of employment growth is expected to occur in . . . centers such as Downtown, South Lake Union, University District, and Northgate").

[5] *See*, *e.g.*, DEIS at 3.6-91 and 3.6-172.

The Final Plan should also adopt, and the FEIS should thoroughly study, refinement of NC and Midrise zones to maximize housing potential, including removal of 250' building length limits and all upper-level setbacks.

We also support the City's new Neighborhood Center designation. As a company that believes in and has invested heavily in building this City and completing neighborhoods like Yesler Terrace, we agree balanced neighborhoods should have jobs, residents and amenities. We support the idea behind the Neighborhood Centers in lower density areas and agree that it was a good idea to judiciously identify the locations where these Centers make sense based on transit connectivity. We support the Draft Plan's designations, and wouldn't oppose identifying a few additional centers. However, the City also should not lose sight of the fact that most of our new housing and jobs will not be in these areas, so common sense baseline zoning changes in our Urban Centers and Regional Centers will do more to advance our shared One Seattle goals in the coming decades.

8-4 cont

D. Identify Strategies to Reduce Costs and Restore Regulatory Certainty.

As you know, the current development market is extremely challenging because of high interest rates and high costs of labor, land, materials, and permits. The City's success depends on the success of the development community (including public, private, nonprofit and institutional builders) in delivering the housing and commercial spaces needed to support growth. The City also benefits directly from development as a revenue source through construction sales tax. We encourage the City to identify strategies and polices in the Final Plan and in the EIS to reduce costs and incentivize development, especially in this market environment, so that the pace of development can keep up with the City's needs, especially for housing supply.

8-5

The City should employ several strategies to achieve these ends. Seattle's broad community of housing stakeholders has long observed that "[d]esign review and historic review are among the primary drivers of the permitting timeline [and] can lead to cost increases and high development contingencies."[6] The Final Plan and EIS should both propose policies and study significant reforms in these processes to expand exemptions, speed up permit timelines, and provide greater regulatory certainly for the projects our communities need. Reforms are now mandated by state law, but the City should consider going *beyond* the state's current requirements, and think critically of how permitting and regulatory programs should function to best support housing and job growth and not inhibit it. The Final Plan and EIS should likewise each provide a basis to support continuation of the current exemption from SEPA for housing projects, and higher SEPA thresholds for commercial projects overall.

E. Conclusion.

Comprehensive planning under the Growth Management Act is a tremendous project in the best of times. Given today's confluence of intersecting policy crises, state mandates and economic problems, it is not an overstatement to write that this periodic update's scope of work

[6] HALA recommendations at 37.

is monumental. We truly appreciate all your hard work, thoughtfulness, and countless hours spent endeavoring to balance countless competing priorities and get this job done right.

We believe the Draft Plan is a step in the right direction, and sets the stage for a finished product that can unlock our shared One Seattle goals for prosperity, abundant housing, equity, and sustainability for decades to come. Vulcan is committed to working with you to bringing this result to fruition, and stands ready to provide any additional support we can.

8- 5
Cont

Thank you for taking the time to consider these comments.

Sincerely,

Ada Healey, Chief Real Estate Officer

Letter 9

From: Jack McCullough
To: PCD_CompPlan_EIS
Cc: PCD_OneSeattleCompPlan
Subject: RE: Comment letter
Date: Monday, May 6, 2024 5:02:16 PM
Attachments: Comp Plan EIS Comment Letter (Interbay Work Lofts) (5-6-24).pdf

CAUTION: External Email

Please note in the draft text amendment attachment to this comment letter that the date of the structure's existence should be January 1, 2015, not 2010.

Thanks.

Jack

John C. McCullough
Attorney at Law
McCullough Hill PLLC
701 Fifth Avenue, Suite 6600
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9-1

From: Jack McCullough
Sent: Monday, May 6, 2024 7:24 AM
To: PCD_CompPlan_EIS@seattle.gov
Cc: OneSeattleCompPlan@seattle.gov
Subject: Comment letter

Please see the attached comment letter.

Thanks.

Jack

John C. McCullough
Attorney at Law
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Proposed Text Amendment

Residential Uses in Existing Buildings in II zones

Residential use in II zones. Residential uses are permitted as an administrative conditional use in II zones if all of the following criteria are met. The residential use may be part of a Major Phased Development.

1. The residential use shall be located in a structure existing as of January 1, 2015 and not exceeding 75,000 square feet in gross floor area; and

2. The residential use shall not exceed a density limit of 80 dwelling units per acre; and

3. The residential use shall not be located within 200 feet of a shoreline; and

4. The residential use shall be located adjacent to a non-industrial use; and

5. All dwelling units shall have sound-insulating windows sufficient to maintain interior sound levels at 60 decibels or below in consideration of existing environmental noise levels at the site. The applicant shall submit an analysis of existing noise levels and documentation of the sound insulating capabilities of windows as part of the conditional use permit application; and

6. All dwelling units shall have a permanently installed air cooling system and a balanced ventilation system, which may be combined. The ventilation system shall filter any outdoor air supply through filters rated MERV 13 or higher as determined by the American Society of Heating, Refrigerating, and Air Conditioning Engineers (ASHRAE). The air cooling and ventilation systems shall be indicated on the plan; and

7. The residential use shall be located, designed, and configured in a manner to reduce potential conflict with adjacent existing industrial business operations; and

8. The owner(s) of a building seeking a conditional use for the residential use must sign and record a covenant and equitable servitude, on a form acceptable to the Director, that acknowledges that the owner(s) and occupants of the building accept the industrial character of the neighborhood and agree that existing or permitted industrial uses do not constitute a nuisance or other inappropriate or unlawful use of land. Such covenant and equitable servitude must state that it is binding on the owner(s)' successors, heirs, and assigns, including any lessees of the residential use; and

9. The residential use shall be a part of a mixed-use development that includes non-residential uses permitted in II zones; and

10. Occupancies of dwelling units are voluntarily limited by the building owner to support the availability of housing that is affordable to area workers, such that the residential use consists of either:

a. All dwelling units are live-work units in which the commercial activity qualifies as industrial, or are caretakers' quarters associated with a business on the same site provided no single business shall have more than three associated caretakers' quarters; or

9-1 cont

b. A minimum of 50 percent of the dwelling units are made available at affordable rent or affordable sale price for a period of 75 years beginning January 1 of the year following final certificate of occupancy to eligible households with annual incomes at or below 60 percent of median income for SEDUs, 80 percent of median income for studio and one bedroom units, and 90 percent of median income for two-bedroom and larger units. Standardized procedures and definitions established by the Office of Housing for administration of Chapter 5.73 shall apply. Dwelling units eligible for the multifamily housing tax exemption may be counted towards the minimum 50 percent.

9-1 cont

Letter 10

HOLLAND
PARTNER GROUP

May 6, 2024

Jim Holmes, Strategic Advisor
Office of Planning & Community Development
P.O. Box 94788
Seattle, WA 98124

Via email (*OneSeattleCompPlan@seattle.gov*; *PCD_CompPlan_EIS@seattle.gov*)

Re: Holland Partner Group's Comments on the One Seattle Plan Comprehensive Draft Plan and Draft Environmental Impact Statement

Dear Mr. Holmes:

Holland Partner Group is a West Coast multifamily developer deeply invested in Pacific Northwest – we have built or are in the process of building over 6,000 housing units in the City of Seattle, with more in the pipeline. Our company goal is to create sustainable, socially connected places where people work, live, and enjoy life.

We write to provide comments on the City of Seattle's Draft One Seattle Comprehensive Draft Plan ("Draft Plan") and corresponding Draft Environmental Impact Statement ("DEIS"). The City is engaged in an important planning process that will shape its future. We are strongly supportive of a future Seattle with more housing opportunities for everyone, and we are committed to doing our part to build housing to help alleviate the shortage in Seattle and the Puget Sound. Many of our projects also incorporate income-restricted affordable units through our participation in the City's Multi-Family Housing Tax Exemption program, and we are one of the few high-rise developers who have done so. 10-1

We commend the City in releasing Draft Plan policies that seek to ease barriers to housing development. The Draft Plan represents a good start, but more clarity is needed to ensure the City capitalizes on all opportunities to create new housing as quickly and efficiently as possible. We offer the following comments to highlight such opportunities:

1. *Additional Growth Potential Should be Identified for Regional, Urban, and Neighborhood Centers.*

Three of the four "Key Moves" stated at the outset of the Draft Plan emphasize growth. Growth in terms of housing units and affordability, growth as a corollary to equity and opportunity, and prioritizing growth in complete, walkable communities. Growth in each

of these contexts is premised on projects occurring, which requires them to be economically viable. The City's Comprehensive Plan policies should therefore recognize that its existing land use and zoning framework must be adjusted to ensure housing is economically viable and efficient to construct. Increasing density and removing barriers in the land use code and development process are important ways to do this. We have the following suggestions for study in the final EIS and inclusion in the Plan.

A. *Regional Centers and Urban Centers*

The newly renamed Regional Centers contain Seattle's densest neighborhoods and many of the City's jobs. DEIS at 1-8. The Draft Plan anticipates that the Regional Centers will also accommodate a substantial share of the City's growth. Draft Plan at 21. Yet the Draft Plan and DEIS do not provide specific plans for how this will be achieved. We understand the City intends to complete future subarea plans in these areas, but it is a missed opportunity to delay zoning updates.

10-1 cont

We support DEIS Alternative 5 which anticipates the largest increase in supply of housing, designates Ballard a Regional Center, and proposes to expand Uptown's Regional Center boundaries as well as several other Urban Centers, but the final Plan and FEIS should also include more information about the likely increases in density in the Regional Centers and Urban Centers, and should make some baseline changes ahead of any future subarea planning work.

Baseline changes to Regional and Urban Centers that should be implemented with the Plan include:

i. **Heights.** Zoning should allow, at minimum, heights of 85 feet (and corresponding Floor Area Ratio ("FAR") of 5.75+) for all land in Regional and Urban Centers. This is the height limit that promotes midrise apartment construction, which is the most cost-efficient housing type to deliver. Further, in core areas of Urban Centers, Regional Centers, and areas nearby frequent transit infrastructure (light rail or Bus Rapid Transit lines, in particular), the zoned height should increase to at least 180 feet to align with height limits for mass timber construction with additional corresponding FAR. Finally, in all areas of Downtown and South Lake Union, zoning should allow, at minimum, heights of 240' and corresponding FAR.

ii. **Building Lengths.** Many zones in Regional and Urban Centers restrict building lengths to 250 feet. This restriction is arbitrary, as structures

on separate sites could be built immediately adjacent to each other and result in far greater than 250 feet of perceived building length. Building length limits should be removed in all Regional and Urban Centers, which will result in more efficient housing floorplates for midrise buildings.

iii. **Floorplates.** Many zones in Regional and Urban Centers contain rigid, upper-level floorplate limits that apply to high-rise buildings. These limit the number of units achieved per floor, and by extension, the number of units any single project can deliver. In contrast, floorplate size limits for commercial structures are typically much greater. The City should rethink these limits. High-rise residential floorplate limits in Regional and Urban Centers should be increased to allow at least 14,000 square feet per floor.

10-1 cont

iv. **Setbacks.** Many zones in Regional and Urban Centers require upper-level setbacks, especially on zone edges. The City should study largely removing these setback requirements as they add arbitrary building modulation, cost, and inefficiency in delivering housing.

B. Neighborhood Centers

We support the Neighborhood Center concept. It is a smart idea to allow a variety of uses and building forms in the center of neighborhoods so that the services desired by residents are delivered where they live. With moderate-density housing and commercial centers, we agree Neighborhood Centers will help create a more equitable, livable, inclusive, and climate resilient City envisioned in the in the Draft Plan and DEIS. The City should continue with this approach, but it should make a few adjustments to increase the likelihood of success with this strategy.

i. **Additional Neighborhood Centers.** The City should consider whether additional Neighborhood Centers should be strategically added to the Plan, including those that were studied but not included in the Draft Plan. In particular, any Neighborhood Centers directly bordering Urban Centers should be considered for inclusion.

10-2

ii. **Strategically Expand Neighborhood Center Radius.** The Draft Plan establishes a goal of providing an 800-foot radius around the existing core of Neighborhood Centers. This radius should be increased to a

1/4 mile walkshed in areas where it makes sense based on existing neighborhood features or transit facilities.

iii. **Height Limits.** DEIS alternative 5, which studied the highest levels of growth, contemplates a 75 ft. height limit in the Neighborhood Centers. DEIS at 3.6-172. Yet the Draft Plan describes limiting Neighborhood Centers to 6-story buildings. The Plan should allow 7 story buildings to maximize housing, at least for a full block depth along main streets in Neighborhood Centers. This modest increase will allow development to increase beyond inefficient 4- to 6-story buildings and result in more housing.

10-2 cont

2. *The Draft Plan and FEIS Must Articulate a Plan for Supporting Job Growth and Commercial Development if the City's Planning Efforts are to be Truly Comprehensive.*

The DEIS anticipates 158,000 new jobs from 2024-2044 under all alternatives studied, but it does not articulate the strategies the City will employ to achieve this level of job growth. DEIS at 1-3, Exhibit 1.1-1. The Draft Plan indicates that this figure is based on growth targets adopted by the King County Growth Planning Council, even though these estimates have been consistently exceeded in previous years and are far lower than what the City needs to truly succeed. See DEIS at 1-14.

Job growth and commercial development must be considered if the City intends to create a roadmap for where and how Seattle will grow. Economic growth is vital for a thriving City. We encourage the City to study higher job growth beyond the estimate by the King County Growth Planning Council, and to articulate in the Plan how it specifically strives to achieve this growth. Seattle has seen tremendous economic success in recent years, but it has also seen significant public safety challenges and post-COVID vacancy in the Downtown core. We believe that Downtown Seattle should continue to be the region's economic engine, and the City must articulate its long-range strategy on how to support this in the Plan.

10-3

3. *Eliminating Parking Minimums is a Sensible Policy Shift Which Will Support the Development of a More Transit-Oriented Seattle.*

We support the elimination of parking minimums contemplated in the DEIS and Draft Plan. DEIS at 1-17, 2-20; Draft Plan at 43, LU 5.3. We pride ourselves on creating sustainable, socially connected places that are near job centers and promote walkability and use of public transportation. Consequently, we believe that the policy shift away

10-4

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from parking minimums is essential for future, dense development, that reduces the cost of construction by meeting the market demand for parking. This approach has already existed in much of the City, and it has proven to be a workable policy that allows projects to right-size parking; we encourage the City to continue to expand it through the Plan.

10-4 cont

Thank you for the opportunity to comment.

Sincerely,

Raymond Connell
Managing Director, Holland Partner Group

1000 Dexter Avenue N, Suite 201 | Seattle, WA 98109 | p 206.438.1371| f 206-832-3509

ALEXANDRIA®

Building the Future of Life-Changing Innovation

May 6, 2024

Michael Hubner
Long Range Planning Manager
One Seattle Plan Project Manager
Office of Planning & Community Development
P.O. Box 94788
Seattle, WA 98124

(OneSeattleCompPlan@seattle.gov; PCD_CompPlan_EIS@seattle.gov)

Re: *Comments on Draft One Seattle Comprehensive Plan ("Draft Plan") and its Draft Environmental Impact Statement ("DEIS").*

Dear Michael and OPCD staff:

Alexandria Real Estate Equities ("ARE") is a publicly traded Real Estate Investment Trust. ARE was founded in 1994 as the first real estate company uniquely focused on delivering the buildings and infrastructure needed to support the work of the life science industry. Today, we create and grow life science ecosystems and clusters that ignite and accelerate the world's leading innovators in their work to advance human health by curing disease and improving nutrition. We have a proven record of effectively creating, nurturing, managing, and growing life science ecosystems and clusters across the country by bringing our mission-critical real estate together with scientific innovation, and Seattle is one of our seven selected cluster, mega campus locations.[1] Active in the Greater Seattle region as a long-term owner and occupier since 1996, ARE's operating portfolio represents over three million square feet regionally, including 1.5 million square feet of specialized Class A laboratory space in Seattle centered around South Lake Union, Fred Hutch, the University of Washington and the Bill & Melinda Gates Foundation. In addition, ARE currently has more than 3 million square feet in the development pipeline. 11-1

Informed by our long-term investment in and commitment to supporting Seattle's life sciences institutions and industries through real estate development, we are pleased to provide the following comments on the draft One Seattle Plan ("Draft Plan") and accompanying Draft Environmental Impact Statement ("DEIS").

[1] Other selected clusters for our life science ecosystems include Greater Boston, the San Francisco Bay Area, New York City, San Diego, Maryland, and the Research Triangle.

Alexandria Real Estate Equities, Inc.
400 Dexter Avenue North, Suite 200 | Seattle, WA 98109
TEL 206.408.1550 | FAX 206.325.6348 | www.are.com

1. The Mayor's Recommended Plan and Final EIS Should Prioritize and Incentivize Life Sciences Investment.

The Draft Plan was disappointing in its lack of attention to life sciences. This industry is not only an engine that creates all manner of good, highly specialized and compensated jobs, but is also an engine for providing treatments and cures to some of the most troubling health issues that humanity faces. Although life sciences was identified as a key industry cluster, only general policies were identified to support it in the Plan.[2] Instead, the Plan and the EIS should articulate support for the unique space needs of life science users. Fortunately, many opportunities for improvement are available.

- *The Final Plan and FEIS should propose and study development standards (or flexibility in development standards) to accommodate the unique needs of the life-sciences industry, such as allowances for additional rooftop mechanical equipment, electrical system redundancies, and flexibility in energy code requirements.*

- *The Final Plan and FEIS should study and identify policies supporting significant revisions to the City's entitlement processes to deliver life science projects faster. The design review program must be overhauled consistent with HB 1293 (RCW 36.70A.630) to reduce the number of design review meetings and project risk. The City should also extend and expand the current design review holiday proposed for Downtown and South Lake Union, and it should create a program to expedite life science projects and tenant improvements similar to successful steps taken by San Diego.*[3]

- *The Final Plan and FEIS should acknowledge that laboratory processes can be uniquely sensitive to even the tiniest vibration impacts. As Sound Transit expands, the availability of vibration-free land is expected to decrease. Zoning and development standards should acknowledge and prepare for these effects on the industry, and the FEIS should study the effects of and appropriate mitigation measures for a decrease in vibration-free land capacity.*

11-1 cont

2. The final Plan and EIS Must Include More Detailed Analysis of Impacts Under A Range of Different Scenarios for Employment and the Economy, and Should Articulate a Bold Life Sciences Economic Development Strategy.

The Draft Plan and DEIS take a cursory approach to employment growth over the planning period, both as a factor in commercial built density (including life-sciences space) that will be needed, and as a critical contributing factor in our region's economic success. Both the Draft Plan and EIS appear to assume that job growth in Seattle will exactly match the regional targets set by King County without

11-2

[2] *See, e.g.*, Plan at 130 ("Examples of Examples of Seattle's industry clusters include manufacturing, maritime, biotech and life sciences, global health and health care, clean technology, information technology, tourism, and film and music."); 133 ("employers often face challenges finding qualified job applicants . . . to fill jobs in certain engineering, computer, and life science fields, as well as traditional industries").

[3] *See* https://www.sandiego.gov/development-services/news-programs/life-science-industry-pilot-program

any analysis of how net job growth across the City might actually differ between the different Alternatives studied, or as a result of different economic strategies that could be articulated in the Plan. We are further concerned that the 159,000 jobs (less than 8,000 a year) identified in the Draft Plan and DEIS is a significantly lower target than is actually needed for the City to thrive economically.

The Final Plan and FEIS should provide further quantification for job estimates based on actual economic trends and data to identify a healthy job growth level for the City, and these documents should also articulate specific strategies to achieve such growth. Policymaking should be aspirational in its targets, but also must articulate actionable strategies. Life science users are attracted to Seattle because of our world-class existing institutions, but Seattle is competing with considerably bigger markets who also have world-class institutions. Other cities and states are providing meaningful incentives to competitively attract companies and users—like research and development tax credits, sales tax exemptions, and guaranteed utility supplies—and Seattle should do the same. Policies aimed at incenting life science sector development articulated in the final Plan can be a first step to support these initiatives to compete successfully for new life science opportunities. A specific policy to incentivize locating life science companies in Seattle should be added to the "Business and Industry Retention and Growth" section of the Plan. 11-2 cont

3. The Final Plan and FEIS Should Support Life Sciences by Providing Greater Clarity in its Approach to Additional Density Regional Centers and Urban Centers.

The Draft Plan's new taxonomy of Regional Centers, Urban Centers, and Neighborhood Centers is well-considered. ARE's life-sciences end-users will depend on these centers both for new lab space to conduct their critical work and for the housing needed to accommodate researchers and their support staff in sustainable, equitable and transit-oriented communities here in Seattle.

For Regional and Urban Centers, however, the Draft Plan contains limited information about what development standards will actually be modified as a result of this process. For example, proposed height limit changes in Regional Centers – the engines of our economy – are studied only as "height varies, high-rise allowed." *See* DEIS at 3.6-172. Urban Centers are likewise *studied* up to a height change of 145 feet, but the Draft Plan does not provide information on what heights are actually proposed. This is a tremendous range of potential growth, but also includes the possibility of no upward growth at all. Similarly, but even more problematically, the Draft Plan does not specify what (if any) increases in permissible floor area ratio are contemplated in Regional and Urban Centers, and the DEIS does not appear to include study of the adverse environmental impacts of a failure to provide enough new floor area ratio to keep pace with the job growth necessary for a healthy economy in our City. The City should 11-3

clarify the contemplated density increases in the Final Plan and FEIS, and it should also advance baseline density changes ahead of any future subarea plans for Regional Centers.

At minimum, the City should allow heights of 180 feet in Regional Centers to support building forms necessary for life science research and development. Likewise, the City should adjust the height at which buildings are designated "towers" for under the land use code from 160 feet to 180 feet to allow

flexibility for 180-foot life science buildings without additional modulation, floorplate size, and tower separation standards that undercut essential building functions.

4. Conclusion

Through the One Seattle Plan, the City has a once-in-a-generation opportunity to infuse new energy, opportunity, and industry into the fundamental fabric of Seattle. ARE hopes to contribute to this work not only in the planning process, but in the post-plan buildout, by continuing to bring world-class life science spaces into service here in the Seattle.

We appreciate your consideration of these comments, and look forward to working with you to continue building a Seattle that brings the world new cures, treatments, and other innovations.

11-3 cont

Sincerely,

CHRISTIAN GUNTER
Senior Vice President - Development
Alexandria Real Estate Equities, Inc.
400 Dexter Avenue North Suite 200
Seattle, WA 98109

Letter 12

May 20, 2024

City of Seattle Office of Planning and Community Development
Attn: Director Rico Quirindongo, Michael Hubner, Jim Holmes, Brennon Staley
P.O. Box 94788, Seattle, WA 98124-7088
PCD_CompPlan_EIS@seattle.gov
OneSeattleCompPlan@seattle.gov

Subject: One Seattle Comprehensive Plan Update Draft EIS Comments and One Seattle Comprehensive Plan: Draft for Public Review Comments

Dear Director Quirindongo and OPCD Staff,

We write to you on behalf of the Crescent Collaborative: a coalition of community-based organizations working to support equity within the urban neighborhoods of Chinatown-International District-Little Saigon (Asian-Pacific Islander, Southeast Asian), the Central Area (African-American/Black), Yesler Terrace (home to generations of new immigrants), First Hill, and Capitol Hill (LGBTQ) that lie adjacent to downtown Seattle. Our neighborhoods face ongoing challenges resulting from historical and systemic racism, impacts from the COVID-19 pandemic, and ongoing residential and commercial displacement pressures. Our goal is to counter gentrification in these significant historic neighborhoods that are cultural anchors for marginalized and low-income communities as we foster social equity, economic opportunity and great educational and health outcomes for residents and BIPOC small businesses. 12-1

Thank you for the opportunity to comment on the "One Seattle Comprehensive Plan Update Draft EIS" (DEIS) and the "One Seattle Comprehensive Plan: Draft for Public Review" (Draft Plan). Please see below for comments from the Crescent Collaborative. Our comments are intended to convey our concerns that the Draft Plan will not effectively combat displacement or support equitable development. Additionally, the Draft Plan does not represent the original round of community feedback conducted by OPCD.

Growth Strategy

Replace the Draft Plan Growth Strategy with Alternative 5.

- Alternative 5 plans to accommodate a higher housing unit target than the other action alternatives and the DEIS finds that this alternative will produce the most affordable housing units on net, lowest ratio of physical displacements to affordable housing units built, greatest reduction to economic displacement pressure, and greatest benefit for low-income renter households
- Include Alternative 5 in the Growth Strategy Element of the Mayor's Recommended Plan.

Housing

Build more family sized housing.

- In the Draft Plan, the City concludes, after examining census data and community feedback, that the scarcity of affordable homes with multiple bedrooms contributes to Seattle's lower average housing size compared to the rest of the country.
- Planning for the next two decades of growth based on the current average household size assumes that the City will remain unaffordable for larger households and families.
- Recommendations:
    - Use an average household size that anticipates a future in which the City retains larger households, especially families with children and seniors.
    - Expand middle housing for family-sized homes: Increase the development capacity for fourplexes and sixplexes and allow for 3+ bedroom homes to be built.
    - Expand the affordable housing density bonus.

12-2

Identify and mitigate current zoning regulations with discriminatory effects and racially disparate impacts.

- The history of racial segregation is still reflected in the current development patterns, housing conditions, and access to opportunity. Through zoning regulations like minimum lot size and prohibition on multifamily housing, white and wealthy neighborhoods are shielded from denser development.
- Recommendations:
    - Clarify what actions are being taken to mitigate the historic and current racially discriminatory effects of these zoning regulations.
    - Plan for more housing production in low-displacement risk areas to address racial disparities.
        - This includes adding all Neighborhood Centers that were included in the August 2023 Draft Plan to the Growth Strategy.
        - Add the Corridor place type as described in the August 2023 Draft Plan to allow for midrise development capacity in low-displacement risk areas.

Anti-Displacement Framework

Add to and expand anti-displacement strategies in collaboration with impacted communities.

- The anti-displacement framework does not introduce new methods or expand existing tools. BIPOC communities are being displaced from Seattle. It is concerning to hear that under the current anti-displacement framework, the City of Seattle is not shifting the development paradigm to retain BIPOC residents.
- Potential improvements to the suite of strategies could include increasing support for affordable housing, strengthening tenant protections, endorsing state-level rent stabilization laws, assisting homeowners involved in equitable housing development, promoting land banking, and more.
    - These strategies were shared by communities who are impacted by displacement or leading policy efforts to address displacement in their communities.
- Recommendations:

12-3

- Include a better comprehensive approach reflecting new and stronger strategies that reflect what community members - particularly those from marginalized communities - shared during 2023 engagement efforts.
- Include stronger tools to ensure that growth is equitable such as increasing support for affordable housing, strengthening tenant protections, endorsing state-level rent stabilization laws, assisting homeowners involved in equitable housing development, promoting land banking, and more.

12-3 cont

We look forward to continuing to work with you in advancing this important plan for our entire city and ensuring that all residents can thrive. If you have any questions, please contact Sarah Tran, Lead Consultant, at sarah@samapraxis.org.

Thank you,

Crescent Collaborative Board

Andrea Caupain Sanderson (President)	BIPOC ED Coalition
Jamie Lee (Vice-President)	SCIDpda
Quynh Pham (Treasurer)	Friends of Little Saigon
Michelle Merriweather	Urban League

Letter 13

Futurewise c/o WeWork
1201 3rd Ave #2200, Seattle, WA 98101
(206) 343-0681
futurewise.org

May 6, 2024

City of Seattle Office of Planning and Community Development
Attn: Director Rico Quirindongo, Michael Hubner, Jim Holmes, Brennon Staley
P.O. Box 94788, Seattle, WA 98124-7088
PCD_CompPlan_EIS@seattle.gov
OneSeattleCompPlan@seattle.gov

Subject: Futurewise Comments on the One Seattle Comprehensive Plan Update Draft EIS Comments and the One Seattle Comprehensive Plan: Draft for Public Review Comments

Sent via email to:
PCD_CompPlan_EIS@seattle.gov, OneSeattleCompPlan@seattle.gov

Dear Director Quirindongo and Staff of the Office of Planning and Community Development,

Thank you for the opportunity to review the One Seattle Comprehensive Plan Update Draft EIS ("DEIS") and the Draft Plan for Public Review ("Draft Plan"). We appreciate that the City of Seattle ("the City") has requested public comments to be submitted for the DEIS by 5pm May 6, 2024. Please find our comment on these documents, and their related appendices, listed below. Although we specify which document each comment relates to, any comment that may be applicable to both the DEIS and the Draft Plan should be considered as a comment on each. 13-1

Futurewise Mission Statement

Futurewise works throughout Washington State to support land-use policies that encourage healthy, equitable and opportunity-rich communities, and that protect our most valuable farmlands, forests, and water resources. Futurewise has members and supporters throughout Washington State, including in Seattle.

Draft Plan & DEIS Comments

Growth Strategy

Document	Comment
Draft Plan	**Ensure Adequate Public Services and Facilities for Seattle's Growth Targets** The Draft Plan and DEIS identifies the following growth targets 2024-2044 period: 80,000 housing units and 159,000 jobs.[1] However, Seattle is assigned net housing and job targets of 112,000 housing units and 169,000 jobs between 2019-2044.[2] The Draft One Seattle Plan Housing Appendix explains the City's rationale and method for prorating the King County targets to match the 20-year planning period of the plan.[3] While Futurewise agrees that it is reasonable to deduct the net housing units produced between 2019 and 2023 from the target total for housing-related planning purposes, the growth targets *apply to all growth-related needs*. These needs include public facilities and services such as parks, schools, transportation, utilities, and others. If the City intends to prorate the growth targets that it has been assigned, it must demonstrate that it has provided adequate services and facilities to meet the needs of the people living in housing units built between 2019-2023. The City should: > Demonstrate sufficient public services and facilities to meet the expected population growth associated with the housing and employment growth targets assigned to Seattle in the 2021 King County Countywide Planning Policies ("CPPs") for the full planning period of 2019-2044. > If a prorating method is used to adjust the housing targets, the City should disaggregate the net unit production between 2019-2023 by the housing needs categories provided in RCW 36.70a.070(2)(a)(i)-(ii), including "moderate, low, very low, and extremely low-income households; and emergency housing, emergency shelters, and permanent supportive housing."

13-1 cont

[1] See City of Seattle. "One Seattle Plan—Draft for Public Review," p. 16, March 2024.
[2] See King County. "2021 King County Countywide Planning Policies," Table DP-1: King County Jurisdiction Growth Targets 2019-2044 ,p. 23, March 2023
[3] See City of Seattle. "Draft One Seattle Plan Housing Appendix", p. 10, April 2024.

Draft Plan, Draft Housing Appendix, DEIS

Adopt a Goal-Oriented Approach for Converting Housing Units to Population

Seattle's growth target of 112,000 housing units is calculated based on the median population projection for King County. A formula incorporating three variables—group housing, vacancy rates, and household size—is employed to determine the housing unit requirement from the projected population. For metropolitan cities like Seattle and Bellevue, the formula utilizes an average household size of 2.12. While this is higher than Seattle's average household size in 2020, which was 2.05, it is substantially lower than both the 2.66 average for the rest of King County and the national average of 2.55.[4] Both the Draft Plan and DEIS use an average household size of 2.05 to convert housing units into population growth, which itself is used to forecast employment growth, level of service for parks, solid waste production, and per capita greenhouse gas emissions. 13-2

The City concludes, after examining census data and community feedback, that the scarcity of affordable, multi-bedroom homes contributes significantly to Seattle's lower average household size compared to the rest of the county.[5] Planning for the next two decades of growth based on the current average household size assumes that the city will remain unaffordable for larger households. However, this assumption contradicts the first of the Draft Plan's four key moves, which explicitly states that the City "must align [its] housing plans to meet this specific need and ensure that homes that meet the needs of families".[6]

The City should:

> When calculating the population from the projected 2044 housing unit target, use an average household size that anticipates a future in which the City successfully attracts and retains larger households, especially families with children and/or seniors.

> Target an average household size that strikes a balance between Seattle and the rest of the county by calculating the mean of two. This approach would yield a target of 2.35 people per housing unit, on average.

[4] See *Ibid.*, p. 45.
[5] See *Ibid.*, p. 45.
[6] See City of Seattle. "One Seattle Plan—Draft for Public Review," p. 3, March 2024.

Draft Plan, Draft Housing Appendix

Identify and Take Steps to Mitigate Current Zoning Regulations with Discriminatory Effects and/or Racially Disparate Impacts

RCW 36.70a.070(2)(e) provides that cities such as Seattle must "[Identify] local policies and regulations that result in racially disparate impacts, displacement, and exclusion in housing, including: (i) Zoning that may have a discriminatory effect." In an unreleased draft of the Draft Housing Appendix, staff wrote the following sentence:

> After [using zoning to segregate neighborhoods explicitly on the basis of race] was ruled unconstitutional in 1917, city officials substituted ostensibly race-neutral standards like minimum lot size and prohibitions on multifamily housing — both still present in Seattle's zoning today — as covert ways to shield white neighborhoods from lower-income residents and people of color.[7]

13-2 cont

This finding is supported by peer-reviewed science.[8] Furthermore, the King County CPPs require jurisdictions, including Seattle, to "[e]xplain the extent to which that history is still reflected in current development patterns, housing conditions, tenure, and access to opportunity."[9] and to "Adopt intentional, targeted actions that repair harms to Black, Indigenous, and other People of Color households from past and current racially exclusive and discriminatory land use and housing practices. Promote equitable outcomes in partnership with communities most impacted." Given the importance of such a finding in informing changes to policies and regulations, it should be included in both the Mayor's Recommended Plan and its Housing Appendix.

The City should:

> Include the finding the following sentence in both the Mayor's Recommended Plan and its Housing Appendix: "... city officials substituted ostensibly race-neutral standards like minimum lot size and prohibitions

[7] See Attachment B: Draft Housing Appendix August 2023, p. 4.;
Also see Barnett, Erica. "Mayor's Office Removed All New Anti-Displacement Proposals from Draft 'Anti-Displacement Framework'". Published April 23, 2024.
https://publicola.com/2024/04/23/mayors-office-removed-all-new-anti-displacement-proposals-from-draft-anti-displacement-strategy/
[8] See Bronin, Sara C. "Zoning by a Thousand Cuts." *Pepperdine Law Review* 50 (2023): 719-784.
[9] See King County. "2021 King County Countywide Planning Policies," Table DP-1: King County Jurisdiction Growth Targets 2019-2044 ,p. 43, March 2023

on multifamily housing — both still present in Seattle's zoning today — as covert ways to shield white neighborhoods from lower-income residents and people of color."

> Clarify what actions are being taken to mitigate the historic and current racially discriminatory effects and disparate impacts.

13-2 cont

Draft Plan, DEIS

Quantify the Relationship Between Zoning and Racial Demographics for Current and Proposed Growth Strategies

Addressing the racially disparate impacts of zoning is required by the state's Growth Management Act and King County's CPPs.[10] The City acknowledges that practices of racial exclusion and discrimination have resulted in lasting segregation across Seattle[11] and that low-density zoning is "perpetuating patterns of racial and economic exclusion and contributing to market pressures that cause displacement and gentrification."[12] It indicates its intent to address this pattern of segregation in Growth Strategy Goal 1 and Growth Strategy Policy 1.2, which states that it is a policy to "encourage and plan for a variety of housing types in all neighborhoods to provide opportunities for a diverse population to live throughout the city and to allow people to stay in their neighborhoods as their needs change."[13]

13-3

However, the City fails to provide a quantitative assessment of the relationship between its zoning policies and racial demographics. This makes it difficult to determine the likelihood that the proposed changes will have their intended effect. Providing a quantitative measurement of this relationship would provide valuable guidance on the degree to which it aligns with its own goals. This approach has been undertaken by numerous studies, including one that focused on number-of-unit zoning in Connecticut[14], and another that assessed minimum lot size regulations in Massachusetts[15]. Applying such a method to

[10] See RCW 36.70a.070(2)(f); see also King County. "2021 King County Countywide Planning Policies," Table DP-1: King County Jurisdiction Growth Targets 2019-2044 ,p. 45, March 2023
[11] City of Seattle. "One Seattle Plan—Draft for Public Review," p. 91, March 2024.
[12] *Ibid.* p. 15
[13] *Ibid.* p. 17
[14] See Freemark *et al*. "Bringing Zoning into Focus: A Fine-Grained Analysis of Zoning's Relationships to Housing Affordability, Income Distributions, and Segregation in Connecticut", June 2023. https://www.urban.org/sites/default/files/2023-06/Bringing%20Zoning%20into%20Focus.pdf
[15] See Resseger, Matthew. "The Impact of Land Use Regulation on Racial Segregation: Evidence from Massachusetts Zoning Borders", October 2022. Mercatus Research Paper, https://ssrn.com/abstract=4244120

Seattle's growth strategy would provide important information that is missing from the Draft Plan and DEIS.

The City should:

> Quantify the statistical relationship between zoning and racial demographics in the current growth strategy and each DEIS alternative. Specifically, we suggest measuring the association of the following variables: share of each major US census racial and ethnic category ; and presence of residential zoning that prohibits building types generally affordable to households earning 50-80% of AMI. Racial demographics should also be compared with the low-density residential areas that are not transit-served and therefore under the current draft are not eligible for the increased affordable housing bonus program. [16]

13-3 cont

> Use the coefficient of this statistical model as a metric for comparison. Explain how each DEIS alternative compares with the current baseline. Use this comparative analysis to inform the preferred alternative in the FEIS and the growth strategy described in the Mayor's Recommended Plan.

Draft Plan **Plan for Substantially More Housing Production in Low-Displacement Risk Areas to Address Racial Disparities**

The GMA's Housing Element now requires cities, including Seattle, to "address and begin to undo racially disparate impacts, displacement, and exclusion in housing caused by local policies, plans, and actions."[17] Additionally, King County CPP H-5 requires local jurisdictions, including Seattle, to "[d]emonstrate how current strategies are addressing impacts of those racially exclusive and discriminatory policies and practices" while H-9 directs them to "[a]dopt intentional, targeted actions that repair harms to Black, Indigenous, and other People of Color households from past and current racially exclusive and discriminatory land use and housing practices."[18]

13-4

The Draft Plan growth strategy proposes to address racial disparities with the following two changes: concentrating Neighborhood Centers in

[16] The City finds that "Zones with 50 to 85 ft. height limits (Multifamily flats in buildings between 5 and 8 floors)" are viable for serving households earning 0-80% AMI, see City of Seattle. " Draft One Seattle Plan Housing Appendix", Table 32, p. 119, April 2024.
[17] See RCW 36.70a.070(2)(f)
[18] See King County. "2021 King County Countywide Planning Policies," pp. 43-44,, March 2023

low-displacement-risk areas; and limiting development capacity to three units per lot in high-displacement-risk Urban Neighborhood areas. Although it is difficult to assess the potential impact of these changes on racial disparities without a quantitative metric (see our previous comment), it is clear that there are several ways that the City could improve the likelihood of success.

The first is to allow the development of midrise, multifamily buildings in low-displacement-risk areas. Midrise buildings are approximately five to eight stories in height, and are the building type most likely to be financially accessible to households earning 50-80% of AMI.[19] While market-rate, midrise apartment buildings will not be affordable to every individual Person of Color, they are much more likely to serve this population than detached single-unit homes or "middle housing" typology buildings.

13-4 cont

The second is to allow sixplex development by right in all low-displacement-risk Urban Neighborhood areas. This will further concentrate development opportunities in low-displacement-risk areas, reducing development pressure on high-displacement-risk areas and providing time for additional anti-displacement policies to be put into place.

The City should:

> Add all Neighborhood Centers included in the August 2023 Draft Plan (see Attachment A) to the growth strategy. This includes a total of 50 Neighborhood Centers, the vast majority of which are located in areas of the city with low displacement risk. See Attachment B for a graphic showing the 2023 Draft Plan Neighborhood Centers overlaid on the 2022 Displacement Risk Index.

> Add the Corridor place type, as described in the August 2023 Draft Plan (see Attachment A) to the growth strategy. This will add a significant amount of midrise development capacity in low-displacement-risk areas throughout the city. See Attachment C for a graphic showing the 2023 Draft Plan Corridors overlaid on the 2022 Displacement Risk Index. Of particular importance, the corridor place type should include areas near major park entrances (as in the DEIS, but not in the draft plan) to balance out the racially disparate impacts of a corridor strategy that focuses solely on

[19] See Draft One Seattle Plan Housing Appendix", Table 32, p. 119, April 2024.

existing frequent transit corridors.

> Increase the baseline maximum unit count in low-displacement-risk Urban Neighborhood areas to six units and increase the base maximum floor area ratio to 1.6 to align with Washington Department of Commerce's Middle Housing Model Ordinance.[20] Increase the baseline maximum unit count in low-displacement-risk areas near frequent transit service to eight units.

13-4 cont

Draft Plan, DEIS

Increase the Ability of All Residents to Live in the Neighborhood of their Choice

Countywide planning policy H-18 requires that cities "Adopt inclusive planning tools and policies whose purpose is to increase the ability of all residents in jurisdictions throughout the county to live in the neighborhood of their choice, reduce disparities in access to opportunity areas, and meet the needs of the region's current and future residents by:

a) Providing access to affordable housing to rent and own throughout the jurisdiction, with a focus on areas of high opportunity;

b) Expanding capacity for moderate-density housing throughout the jurisdiction, especially in areas currently zoned for lower density single-family detached housing in the Urban Growth Area, and capacity for high-density housing, where appropriate, consistent with the Regional Growth Strategy; Chapter: HOUSING 46 2021 King County Countywide Planning Policies

13-5

c) Evaluating the feasibility of, and implementing, where appropriate, inclusionary and incentive zoning to provide affordable housing; and

d) Providing access to housing types that serve a range of household sizes, types, and incomes, including 2+ bedroom homes for families with children and/or adult roommates and accessory dwelling units, efficiency studios, and/or congregate residences for single adults.

To better show how the city is complying with these requirements the city should:

> Expand the missing middle affordable housing incentive program to the

[20] See Washington Department of Commerce. "TIER 1 AND 2 CITIES MIDDLE HOUSING MODEL ORDINANCE", p. 13, January 2024. https://deptofcommerce.app.box.com/s/2l4yetpanyztkjbpumdfdadghh2rfag7

high opportunity areas that are currently not part of the frequent transit service area.

> Ensure that the distribution of new neighborhood centers furthers the opportunities for affordability and housing choice throughout the city, especially in areas currently zoned for lower density.

13-5 cont

Draft Plan, DEIS

Plan for Centers Near New Light Rail Stations

VISION 2050, the long-range growth strategy for the four-county Puget Sound region, directs Metropolitan Cities, including Seattle, to focus growth in their Regional Centers and high-capacity transit areas.[21] MPP-RGS-8 specifically directs jurisdictions, including Seattle, to "[a]ttract 65% of the region's residential growth and 75% of the region's employment growth to the regional growth centers and high-capacity transit station areas to realize the multiple public benefits of compact growth around high-capacity transit investments."[22] VISION 2050 identifies the 130th Street and 145 Street light rail stations as a high-capacity transit station areas[23], a term that it explicitly defines as an area "within ½ a mile of existing or planned light rail".[24]

13-6

The City should:

> Designate the residential area within a half mile of the 145th Street light rail station as Neighborhood Center. This area is west of Interstate 5 and south of the jurisdiction boundary that separates Seattle from Shoreline.

> Plan for transit-oriented development in all areas within a half mile of the 130th Street light rail station. Replace all Lowrise 1, Lowrise 2, and Lowrise 3 zones with Midrise Multifamily within this high-capacity transit station area.

Draft Plan, DEIS

Plan for Regional Centers in South Seattle and West Seattle

There are currently no Regional Centers in either South Seattle or West Seattle, and none are planned to be added in the Draft Plan. As Seattle City Councilmember Tammy Morales observed at a council briefing in March 2024,

[21] See Puget Sound Regional Council. "VISION 2050", MPP-RGS-8, p. 31, October, 2020.
[22] *Ibid.*, MPP-RGS-8, p. 43, October, 2020.
[23] *Ibid.*, p. 72
[24] *Ibid.* p. 128

it is inequitable to concentrate employment opportunities in the central and northern parts of the city.[25] While there are certain criteria that must be met in order for a center to qualify as an Urban Growth Center under King County's CPPs[26], there is an opportunity to plan for enough housing and employment activity in several South Seattle centers to meet these criteria. According to DEIS Exhibit 3.6-112 Future Activity Units (AU)—Alternative 5, both Mt. Baker and West Seattle Junction meet the criteria for existing activity unit (AU) density and size. While these two centers do not currently meet planned activity unit density minimum[27], the City has the ability to adjust the planned density in this comprehensive plan update.[28]

The City should:

13-6 cont

> Increase development capacity in both the Mt. Baker and West Seattle Junction centers to exceed King County's minimum planned activity unit density of 60 AU/acre.

> Add Mt. Baker and West Seattle Junction to the list of Regional Centers described in the Growth Strategy—Area Planning subsection.

> Add Mt. Baker and West Seattle Junction to the list of Regional Centers described in the Regional Center Subarea Plans section on p. 194.

> Update the Growth Strategy maps to show Mt. Baker and West Seattle Junction as Regional Centers instead of Urban Centers.

Draft Plan, DEIS

Amend Alternative 5 and Replace the Draft Plan Growth Strategy with the Amended Version

13-7

Based on the information provided, we believe that DEIS Alternative 5: Combined ("Alternative 5") is most likely to meet the goals and responsibilities of the City of Seattle provided it fully complies with the Growth Management

[25] See Seattle City Council. "Council Briefing, Inf 2419, One Seattle Comprehensive Plan - Draft Plan Overview and Rollout", March 11, 2024. Video recording accessible at: https://www.seattlechannel.org/CouncilBriefings/?videoid=x155383&Mode2=Video
[26] See King County. "2021 King County Countywide Planning Policies," Appendix 6: King County Centers Designation Framework, pp. 106-111, March 2023
[27] In DEIS Alt. 5, the planned density of Mt. Baker and West Seattle Junction are 47.1 and 59.9, respectively; the minimum planned activity unit density for an Urban Growth Center in King County is 60.
[28] See Attachment E: DEIS Alt 5 and Growth Center Designation Criteria Tables for a side-by-side comparison of future AU density and King County's Center Designation Framework criteria.

Act ("GMA"), Puget Sound Regional Council ("PSRC") VISION 2050, multicounty planning policies, and King County Countywide Planning Policies ("CPP") requirements, goals, and objectives. Alternative 5 plans to accommodate a higher housing unit target than the other action alternatives (120,000 and 100,000 respectively).

The DEIS finds that Alternative 5 will produce the most affordable housing units on net[29], the lowest ratio of physical displacements to affordable housing units built, the greatest reduction to economic displacement pressure[30], the greatest benefit for low-income renter households[31], the lowest greenhouse gas emissions per capita[32], and the lowest vehicle-miles traveled ("VMT") per capita[33]. 13-7 cont

The City should:

> Amend Alternative 5 to reflect all relevant changes suggested in this comment letter

> Designate the amended version of Alternative 5 as the preferred alternative in the Final EIS ("FEIS")

> Include the amended Alternative 5 growth strategy in the Growth Strategy Element of the Mayor's Recommended Plan

Transportation

Document	Comment
Draft Plan	**Prioritize Carbon-Neutral Transportation Modes** 13-8

The City should:

> Keep the following transportation and environmental goals: net-zero citywide emissions by 2050 (see T 4.1), 20% reduction in VMT by 2044 (see T

[29] City of Seattle. "Draft EIS: One Seattle Comprehensive Plan Update", Exhibit 3.8-47. Comparison of Demolished Units to New Affordable Housing from MHA and MFTE, March 2024
[30] *Ibid.* p. 3.8-54
[31] *Ibid.* p. 3.8-61
[32] *Ibid.* p. 3.2-23
[33] *Ibid.* p. 3.10-103

4.2), and a 37% reduction in VMT by 2044.

> Eliminate parking minimum requirements for all land uses types citywide.

> Plan to prioritize street right of way differently in different contexts: within centers and neighborhoods, streets should prioritize active transportation that is safe and sustainable; between centers and neighborhoods, streets should prioritize public transit; and within and between Manufacturing and Industrial Centers, streets should safely accommodate the reliable movement of goods.

13-8 cont

Housing

Document	Comment
Draft Plan, Draft Housing Appendix	**Revise the Regulatory Barrier Analysis, Follow Department of Commerce Guidance** RCW 36.70A.070(2)(d) requires cities planning under the GMA, such as Seattle, to include in their comprehensive plan a housing element that "[m]akes adequate provisions for existing and projected needs of all economic segments of the community, including… (ii) [d]ocumenting programs and actions needed to achieve housing availability including gaps in local funding, barriers such as development regulations, and other limitations." The Department of Commerce provides guidance on how to identify barriers to housing production, including development regulations and process obstacles. Exhibit B2: Low-Rise or Mid-Rise housing barrier review checklist lists ten types of development regulations and six types of process obstacles that jurisdictions should assess.[34] The Draft Housing Appendix identifies only three regulatory barriers to housing production: zoning, development standards, and permitting times.

13-9

[34] See Washington Department of Commerce. "Guidance for Updating Your Housing Element: Updating your housing element to address new requirements", Exhibit B2: Low-Rise or Mid-Rise housing barrier review checklist, pp. 117-118, October 2023.

The document provides a single paragraph description of each, without identifying specific types of each and addressing them in turn. This approach fails provide a detailed analysis of how different regulatory policies[35] affect housing production and what actions may be needed to address each barrier.

The City should:

> Complete the Barrier Review Checklist provided in Exhibit B2 of the Department of Commerce's "Guidance for Updating Your Housing Element: Updating your housing element to address new requirements" report.

> The regulatory barrier analysis should also include a review of specific barriers to a variety of household sizes for those affordability levels including 2+ bedroom homes for families and congregate residences for individuals as specified in Countywide Planning Policy H-18.

13-9 cont

Draft Plan, DEIS

Summarize Development Capacity by Projected Housing Need Category for the FEIS Preferred Alternative

The City should:

> Include a table that summarizes zoned land development capacity analysis and projected housing needs for the FEIS preferred alternative and the growth strategy described in the Growth Strategy Element of the Mayor's Recommended Plan. The table should disaggregate housing unit development by AMI band, following the guidance provided by the Department of Commerce[36], in order to ensure we are providing sufficient capacity for housing affordable to low-income people and demonstrate that the plan will comply with the Growth Management Act's Housing Element requirements provided in RCW 36.70a.070(2)(c)-(d). Table 34 in the Draft Housing Appendix provides an excellent template for this information.

13-10

[35] Examples of regulatory barriers to housing production include prohibition of moderate-density housing types, high minimum lot sizes, low maximum FAR, etc. See Washington Department of Commerce. "Guidance for Updating Your Housing Element: Updating your housing element to address new requirements", Exhibit B2: Low-Rise or Mid-Rise housing barrier review checklist, pp. 117-118, October 2023.
[36] See Washington Department of Commerce. "Guidance for Updating Your Housing Element: Updating your housing element to address new requirements", October 2023. https://deptofcommerce.app.box.com/s/1d9d5l7g509r389f0mjpowh8isjpirlh

Draft Plan, Updating Seattle's Neighborhood Residential Zones

Increase FAR Maximum in Neighborhood Residential Zones to Meet or Exceed Middle Housing Model Ordinance

The table titled "Key standards in updated Neighborhood Residential zones" on p. 12 of "Updating Seattle's Neighborhood Residential Zones" states that the baseline maximum floor area ratio (FAR) will be 0.9. This is less than the suggested development intensity included in Department of Commerce's Middle Housing Model Ordinance, which is designed to meet the *minimum* criteria in HB 1110 and stipulates 1.2 FAR for 4-unit developments and 1.6 FAR for 6-unit developments. Limiting FAR will result in small homes that are unlikely to meet the needs of large households, especially families with children and/or seniors.

13-10 cont

The City should:

> Increase the allowed FAR for middle housing to feasibly allow for family-sized two, three, and four bedroom homes to be built throughout the city. At a minimum, the City should align standards with the Department of Commerce's model ordinance. We recommend no less than 1.4 FAR for fourplexes and no less than 1.6 FAR for six- plexes.

> Retain the FAR incentives retaining existing structures and consider additional FAR incentives for retaining large and culturally significant trees.

Draft Plan

Expand Mandatory Housing Affordability Program to Include All Centers and Corridors

Housing Policy H 3.14 includes inclusionary zoning as one of tools used to create affordable housing. Seattle's inclusionary zoning program, known as Mandatory Housing Affordability ("MHA"), was launched in 2017. Since then, it has generated $246.1 million to support affordable housing development in Seattle. However, MHA would not automatically extend to areas outside the current Urban Centers and Urban Villages that experience significant increases in development capacity. If the program isn't expanded in line with proposed growth strategy changes, the City risks losing a substantial amount of funding for affordable housing.

The City should:

> State that MHA will be applied to all areas within Region Centers, Urban Centers, Neighborhood Centers, and Corridors.

> Explore the implications of implementing inclusionary zoning fees in middle housing zones and propose MHA adjustments that balance the objectives of increasing middle housing production and generating funds for publicly-subsidized affordable housing.

> Identify financing, payment schedule, and on-site compliance challenges that small developers face and incorporate strategies to address those challenges without completing excluding MHA from middle housing zones

13-10 cont

Draft Plan, Draft Anti-Displacement Framework

Add to and Expand Anti-Displacement Strategies, in Collaboration with Impacted Communities

The Draft Anti-Displacement Framework does not introduce new methods or expand existing tools to prevent displacement. However, an earlier, unpublished draft of this document included many ways that Seattle's anti-displacement "toolkit" could be improved.[37] These improvements included increasing support for affordable housing, strengthening tenant protections, endorsing state-level rent stabilization laws, assisting homeowners involved in housing development, promoting land banking, community land trust development, and Public Development Authority-led development, and introducing a Community Opportunity to Purchase Act, among others.

According to the draft report, many of these ideas were shared with the city by community members who have experienced displacement and/or are working on solutions to displacement.[38] Despite engaging with these community members, the City did not incorporate any of their proposals in the final Draft Plan or Anti-Displacement Framework. This omission raises concerns about the City's compliance with King County CPP H-8, which directs jurisdictions (including Seattle) to "*Collaborate* with populations most disproportionately impacted by housing cost burden in developing, implementing, and

[37] See Barnett, Erica C. "Mayor's Office Removed All New Anti-Displacement Proposals from Draft 'Anti-Displacement Framework'", April 23, 2024. https://publicola.com/2024/04/23/mayors-office-removed-all-new-anti-displacement-proposals-from-draft-anti-displacement-strategy/; also see Attachment D: Draft Anti-Displacement Framework August 2023
[38] See City of Seattle. "One Seattle Plan Anti-Displacement Framework — DRAFT NOT FOR DISTRIBUTION", p. 10, August, 2023.

monitoring strategies that achieve the goals of this chapter. *Prioritize the needs and solutions articulated by these disproportionately impacted populations* [emphasis added]."

The City should:

- Add the new and expanded anti-displacement strategies listed in the August 2023 draft of the Anti-Displacement Framework to the Mayor's Recommended Plan and final version of the Anti-Displacement Framework.
- Conduct additional focused engagement with populations disproportionately impacted by housing cost burden to receive feedback on the anti-displacement strategies

13-10 cont

Thank you for considering our comments. If you require additional information, please contact Tiernan Martin (tiernan@futurewise.org).

Sincerely,

Tiernan Martin, Director of Research
Futurewise

Attachments

This comment incorporates the following attachments by reference, and we ask that they be added into the public record as a part of these comments:

Attachment A. Draft One Seattle Plan August 2023

Attachment B. Displacement Risk Index with Neighborhood Centers from August 2023 Draft Plan

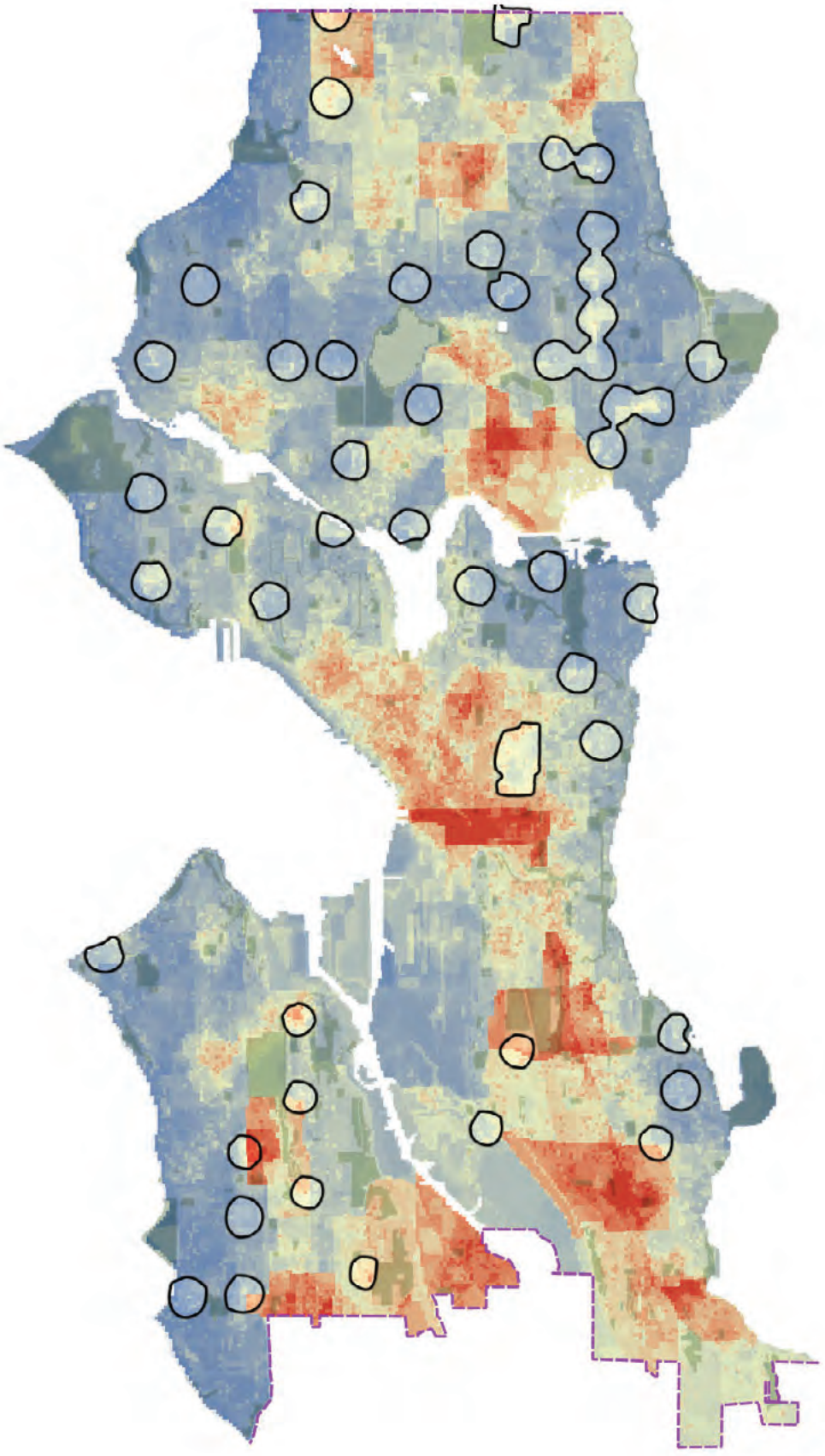
Attachment C. Displacement Risk Index with Corridors from August 2023 Draft Plan

Attachment D. Draft Anti-Displacement Framework August 2023

Attachment E. DEIS Alt 5 and Growth Center Designation Criteria Tables

The Futurewise requests the City of Seattle to include the following document in the public record:

City of Seattle. “One Seattle Comprehensive Plan: Public Review Draft”, June 2023. Accessible for download at: https://futurewiseorg.sharepoint.com/:b:/g/EYK_mzhgGw9CgVMoSvva-jtwB1eTJkbe2RZ7UPQ-01Py57g?e=keRHuq



The Futurewise requests the City of Seattle to include the following document in the public record:

City of Seattle. “Draft Anti-Displacement Framewprl”, August 2023. Accessible for download at: https://futurewiseorg.sharepoint.com/:b:/g/EYp7Go9C-pZDmqO27INDoQwBvGtOWpWD-mql_FfcP_eyRuQ?e=CWxkMB

Exhibit 3.6-112. Future Activity Units (AU)—Alternative 5

Center	Existing AU/Ac.	Alt. 1 AU/Ac.	Alt. 5 Acres	Alt. 5 AU	Alt. 5 AU/Ac.
Regional Centers[1]					
Downtown	377.4	473.2	952	447,351	469.9
First Hill/Capitol Hill	139.5	163.4	916	149,578	163.3
University Community	54.5	70.2	753	52,695	69.9
South Lake Union	236.7	344.1	340	115,612	340.2
Uptown[2]	131.3	161.3	391	53,723	137.2
Northgate	57.3	75.1	412	30,803	74.7
Ballard[2]	67.7	96.9	495	50,047	101.0
Hub Urban Centers[1]					
Bitter Lake Village	44.0	55.4	364	20,044	55.1
Fremont	72.9	88.1	214	18,877	88.0
Lake City	57.6	75.4	142	10,688	75.1
Mt Baker	36.0	47.4	491	23,135	47.1
West Seattle Junction[2]	70.4	100.2	449	26,934	59.9
Residential Urban Centers[1]					
130th Street[2]	18.4	20.7	218	7,733	35.5
23rd & Union-Jackson	32.9	46.5	625	29,046	46.5
Admiral[2]	49.2	69.4	288	6,886	23.9
Aurora-Licton Springs	44.1	51.4	327	16,775	51.3
Columbia City	33.9	46.1	335	15,390	46.0
Crown Hill	25.8	31.4	271	8,492	31.3
Eastlake	70.2	82.0	199	16,323	81.9
Green Lake	70.6	87.4	109	9,492	87.3
Greenwood-Phinney Ridge[2]	84.3	101.6	315	9,579	30.4
Madison-Miller	65.3	85.1	145	12,349	85.0
Morgan Junction[2]	34.1	41.6	281	7,169	25.5
North Beacon Hill	28.1	34.3	267	9,161	34.3
Othello[2]	23.7	29.0	584	17,894	30.6
Rainier Beach	23.0	26.0	346	12,893	37.3
Roosevelt	61.4	81.2	170	13,801	81.1
South Park	14.7	18.5	263	7,951	30.2
Upper Queen Anne[2]	89.5	110.5	329	5,857	17.8
Wallingford	42.2	51.3	258	13,248	51.4
Westwood-Highland Park	27.9	32.6	275	9,386	34.1

1 See **Exhibit 2.1-1** in **Chapter 2** for a cross-walk of existing place types (existing and Alternative 1) versus proposed place type names under Alternatives 2-5.
2 Proposed new center, redesignated center, or boundary expansion.
Note: Activity units (AU) is the sum of residential population and jobs. Assumes an average household size of 2.05 per the King County Growth Management Planning Council. Highlighted urban villages fall outside King County's countywide center designation criteria of 160–500 acres or below the minimum 18 existing AU or 30 future AU per acre. MIC designation criteria from PSRC does not include an AU density threshold.
Sources: City of Seattle, 2023; BERK, 2023.

	Metro Growth Centers	Urban Growth Centers	Countywide Growth Centers
3. freight access	Yes	To be addressed in subarea plan	To be addressed in subarea plan
PART 3: CENTER CRITERIA			
A. Purpose			
1. Compatibility with VISION centers concept, Regional Growth Strategy and Multicounty Planning Policies	Yes	Yes	Yes
B. Activity level/Zoning [20]			
1. existing activity [21]	60 activity unit density	30 activity unit density (AUs refer to combined jobs and population)	18 activity unit density
2. planned activity	Above 120 activity unit density	60 activity unit density	30 activity unit density
3. sufficient zoned capacity	Yes. Should be higher than target and supports a compact, complete, and mature urban form.	Yes. Should be higher than target.	Should have capacity and be planning for additional growth
4. planning mix of housing types and employment types	Planning for at least 15% residential and 15% employment activity	Planning for at least 15% residential and 15% employment activity	Planning for at least 20% residential and 20% employment, unless unique circumstances make these percentages not possible to achieve.
C. Geographic Size			
1. minimum size	320 acres	200 acres	160
2. maximum size	640 acres (larger if internal HCT)	640 acres (larger if internal HCT)	500 acres
D. Transit			

20 PSRC's 2015 guidance on Transit Supportive Densities and Land Uses cites an optimal level of 56-116 activity units per acre to support light rail, dependent on transit costs per mile. The guidance indicates an optimal threshold of at least 17 activity units per acre to support bus rapid transit. Note: the existing threshold in the CPPs is roughly equivalent to 85 AUs existing activity for King County Urban Centers.

21 For existing centers, not meeting existing activity unit thresholds is not grounds for de-designation or re-designation by the Growth Management Planning Council.

Letter 14

NAIOP
COMMERCIAL REAL ESTATE DEVELOPMENT ASSOCIATION
WASHINGTON STATE CHAPTER

May 6, 2024

VIA EMAIL

Rico Quirindongo, Director
Jim Holmes, Strategic Advisor
Office of Planning and Community Development
600 4th Ave, 5th Floor
Seattle, WA 98104
Email: OneSeattleCompPlan@seattle.gov, PCD_CompPlan_EIS@seattle.gov

Re: Draft Environmental Impact Statement One Seattle Comprehensive Plan Support for Alternative 5

Mr. Quirindongo and Mr. Holmes:

Thank you for the opportunity to comment on the draft One Seattle Comprehensive Plan ("Draft Plan") and Draft Environmental Impact Statement ("DEIS").

On behalf of NAIOP Washington State, the Commercial Real Estate Development Washington State (NAIOPWA) and our more than 1,000 members, we write to encourage the City of Seattle to continue to be bold in its approach to the One Seattle Comprehensive Plan to achieve the City's most important policy goals over the next 20 years. In our view, the focus of the Plan should be economic recovery and revitalization, sustained investment, housing affordability and jobs growth. To that end, we are supportive of Alternative 5, including added development capacity in the "new place types," and there are a few areas where the City should go farther in a "Preferred Alternative" to achieve the City's goals. Given the economic environment and housing affordability crisis, we encourage you to consider the suggestions below in order to maximize growth potential that is supportive of housing and jobs creation. 14-1

Land Use

In general we support Alternative 5, Combined Growth Strategy, that seeks to add the greatest amount of new housing units and zoned capacity through combined place types. The City should focus on maximizing development capacity and removing zoning barriers where the most units are likely to materialize over the next decade, in Regional Centers and Urban Centers. Specifically, we support the following:

- Regional Centers. The City should continue to be ambitious in allowing for the highest levels of density within Regional Centers, as shown in Alternative 5. We support designation of Ballard as a Regional Center and expansion of Uptown Regional Center. We also support the expansion of regional centers (formally urban centers) to include the ½ mile walkshed from their central point and from any light rail station. Further, the City should increase zoned height and density for all land within Regional Centers. At minimum, the allowed heights should be 85' with a commensurate 5.75+ Floor Area Ratio ("FAR"), and all areas of Downtown and South Lake Union should have a minimum zoned height of 240' with unlimited residential FAR. The City should also study high-rise typology on the blocks surrounding existing and contemplated future lightrail, including height up to 240 feet in the blocks surrounding the Northgate lightrail station and future Ballard station. Since the DEIS contemplates that the vast majority of growth potential will continue to be in the Regional Centers, the City should implement the baseline zoning changes identified above as part of Plan implementation, then use the future identified Subarea planning process to identify opportunities for further upzones within the Regional Centers, including Downtown, but those future processes shouldn't foreclose necessary changes now. Alternatively, if the City does not implement the Regional Center upzones with the One Seattle Plan, the City should expedite the subarea planning process for all Regional Centers to be completed by 2025. The Ballard Regional Center should be among those priority subarea plans because without clarity regarding implementing zoning, the uncertainty will discourage investment and development activity in Ballard until there is clear zoning. Waiting to start the Ballard subarea plan zoning process until 2027 will result in years of missed opportunity for housing in Ballard.

14-1 cont

- Corridors. We support the Corridors concept articulated in the Draft EIS and as shown in Alternative 5, Exhibit 2.4-22. The City should study increased height that accommodates up to eight stories (85 feet) for the width of a full block along major transit corridors (including any BRT lines), with priority near frequent transit stops. This allows for parking below grade, and additional unit yield contributes to housing affordability. The City should additionally study a range of five to seven stories (75 feet) for an additional block width along major transit arterials, especially near rapid transit stops.

- Neighborhood Centers. We support the Neighborhood Centers concept with 75 feet in height as articulated in Alternative 5, especially on the main streets for such Centers. Opportunities for multifamily in these locations supported by service-oriented commercial supports the City's goals to reduce vehicle trips and expand housing options where they have been historically limited. In particular, we support the Neighborhood Centers nearest the Regional Centers and well-connected by transit, because we believe they are most

likely to contain viable housing development opportunities. We support the Neighborhood Centers identified in the Draft Plan, and would support the inclusion of a few additional Centers, especially those that are immediately adjacent to an existing Urban Center (formerly Urban Village).

- Bonuses. We support the study of bonuses for affordable housing City-wide, as stated in Alternative 5. Exhibit 2.4-26. There is no reason to limit this incentive to certain parts of the City in a housing crisis.

- Mass Timber. We encourage the City to adopt a bonus incentive for use of all mass timber, especially mass timber sourced from regional sources, similar to the Living Building Pilot Program. This will help the City meet its sustainability and climate goals, and spur the market adoption of mass timber product for new housing construction. All properties within Seattle Mixed zoning should be able to achieve a maximum of 160 feet height through the use of all mass timber construction. In the commercial zones, all properties should be able to achieve a maximum height of 95 feet through mass timber incentives.

- Manufacturing Industrial Centers. The DEIS studies no further changes within the MICs under any alternative. The City should study the following limited changes within the MIC in the FEIS (or through the industrial subarea plans):

    - Allow residential uses in "catalyst" sites such as WOSCA, the Armory property in Interbay, the Stadium District, and around the Lander Street light rail station.
    - Remove areas outside of the MICs from industrial designation, such as the isolated blocks of industrial commercial in the Fremont Urban Center and northeast Ballard.

  Additionally, the Council should continue to decline any proposal to apply Mandatory Housing Affordability fees in all industrial zones. As you know, the City and stakeholders have worked over the course of years to craft zoning policy that renews and strengthen our industrial lands; additional fees should not be allowed to undermine this effort. Application of MHA fees would offset the potential investment incentives provided by the new II zoning and would only undermine the overarching policy goals of this rezone. In particular, the current investment climate does not support additional development fees. Likewise, the City should resist any requests to apply design review to industrial zones.

14-1 cont

Downtown Revitalization

As the City begins its study of the Downtown Regional Center, we encourage you to implement the following:

- Flexible street-level uses. Much of the existing street-level retail in Downtown is currently vacant. The City should study flexible street-level requirements and uses within Downtown to ease regulatory barriers to conversions and redevelopment. We support passage of the interim flexible use ordinance the Mayor has transmitted to Council, and the City should study in the FEIS extending this framework to other Regional and Urban Centers.
- Interim MHA fee exemption. The City should evaluate any tool that would facilitate adaption of existing buildings to the current market, or facilitate new development downtown. This includes a temporary exemption for any new development or change of use in downtown from MHA fees, especially if it includes residential uses. The City should study the deferral of MHA fee collection to certificate of occupancy, not at permit issuance.

14-2

Jobs

The Draft Plan identifies 159,000 jobs over the next 20 years, consistent with the identified growth target, yet the City grew 175,000 jobs in the 10 years between 2010 and 2020. The DEIS likewise studied this level of job growth, despite varied zoning changes. The City should identify not just the assigned growth target—but the level of economic growth necessary for a successful economy—and it should plan for that. We are concerned that neither the Draft Plan nor the DEIS appear to do this or appear to articulate a specific economic development strategy. At minimum, a "Preferred Alternative" in the FEIS should articulate the higher level of job growth necessary for Seattle to maintain a robust economy, and the Final Plan should reflect specific economic development strategies to achieve this.

14-3

Simplify Entitlements

Land use entitlements for development City-wide should be simplified and shortened.

- Design Review Reform and Exemptions. Consistent with HB 1293 (RCW 36.70A.630) design review may not include more than one public meeting, and may not reduce the density, height, bulk or scale of a development below applicable zoning. Further, all design guidelines must be clear and objective. These state law requirements apply to more than just the City's design review program, but they also apply to the historic and Design Commission reviews, as well, and warrant significant overhaul of current systems. We encourage the City to think beyond just the state law mandates for reform and embrace change in these review programs. We'd specifically suggest widespread exemptions from design review for all housing projects, or at minimum, those within Regional and Urban Centers. For those projects still undergoing design review, we recommend a single public

14-4

meeting at the "Early Design Guidance" stage, and reconstitution of the Design Review Boards with additional training and professional experience requirements for members.

- SEPA. As required by state law, any development including residential uses should continue to be exempt from SEPA review city-wide. We applaud the City for including this as part of the EIS process with the One Seattle Plan and agree that the current regulatory framework is sufficient mitigation. The SB 5412 exemption has been in effect for nearly one year and, as anticipated, it has been working well to produce infill housing without adverse environmental impacts. Likewise, the FEIS should be sufficiently detailed to increase non-residential SEPA thresholds. The City should not create any additional historic review layer for SEPA-exempt projects; no additional historic resources mitigation is warranted.

14-4 cont

Costs and Fees

- Mandatory Housing Affordability. The City should decline any proposal to raise MHA fees in the short-term. The existing MHA fee levels are a hinderance to development in many areas outside the urban centers. For the Neighborhood Centers and Corridors concepts to yield results, MHA fees should be recalibrated in these areas. All implementing zoning changes as part of this process should be exempt from MHA fee increases (i.e., in areas where MHA already applies, the City should not increase the "tier" of MHA application with any upzones). The City should study the deferral of MHA fee collection to certificate of occupancy, not at permit issuance, for all projects subject to MHA going forward.
- Other impact fees. The City should continue to decline any proposal for other types of impact fees, including transportation impact fees. The current financing and economic environment does not support increased costs on housing development.

14-5

We are looking forward to continued dialogue on the City's Comprehensive Plan update and future zone. Thank you for all your work on the Plan to date. Please do not hesitate to contact us with any questions about the above.

Sincerely,

Danielle Duvall
Executive Director, NAIOP Washington State

Letter 15

BELLWETHER HOUSING

Office of Planning and Community Development
Seattle City Hall
600 4th Avenue, 5th Floor
Seattle, WA 98104
Attn: Jim Holmes; Rico Quirindongo
PCD_CompPlan_EIS@seattle.gov

May 6, 2024

Re: Support for Additional Residential Capacity Downtown

Dear Mr. Quirindongo,

Thank you for the opportunity to comment on the One Seattle Comprehensive Plan Draft Environmental Impact Statement ("DEIS"), as well as the Draft One Seattle Plan.

Established in 1980, Bellwether Housing has been a pioneering force in Seattle's affordable housing landscape. As the largest nonprofit affordable housing provider in Seattle, Bellwether Housing manages over 3,000 apartments across 35 buildings, serving over 5,000 residents. Our mission is to create stable and equitable communities by developing and managing affordable homes for individuals and families with low incomes. We commend the commitment to affordable housing and the other values articulated in the draft One Seattle Comprehensive Plan.

15-1

Given our mission, we are eager to see allowances for additional residential development across Seattle – particularly in downtown areas, where many of our buildings are located. We firmly believe that increasing housing capacity in the downtown core is essential for addressing Seattle's housing affordability crisis and fostering a more inclusive urban environment.

Accordingly, we are writing to urge that you move forward with the completion and implementation of the Downtown Subarea Plan as quickly as possible. As one of the most densely populated and economically vital areas in the city, downtown Seattle presents a unique opportunity to significantly expand housing options and create more affordable units. Expediting the completion of the plan for this neighborhood will help accommodate the urgent and growing demand for affordable housing.

In addition, we encourage you to study and support plans for additional height and density allowances throughout Seattle, particularly in downtown, during the remainder of the comprehensive planning and subarea planning

www.bellwetherhousing.org
206.623.0506

processes. We note that all alternatives of the DEIS direct the most jobs to downtown, but not necessarily the most housing. An alternative should be studied that creates a better balance between new jobs and new housing units in downtown Seattle. Specifically, areas of Belltown and the Downtown Retail Core zone should be targeted for additional height and mixed-use density. The challenges posed by the recent Covid-19 pandemic have underscored the importance of a robust residential community to a thriving downtown. Maintaining focus on increased housing capacity and affordability will facilitate the creation of vibrant, diverse, and equitable neighborhoods.

15-1 cont

We would be pleased to collaborate with your department as may be helpful to ensure that the One Seattle and Downtown Subarea plans reflect a strong emphasis on residential capacity and affordability, including greater height and density allowances. Thank you for considering our comments.

Sincerely,

Susan Boyd, Chief Executive Officer
Bellwether Housing

From:	Dan Bertolet
To:	PCD_CompPlan_EIS
Subject:	Sightline comments on the One Seattle Plan DEIS
Date:	Monday, May 6, 2024 11:01:07 AM
Attachments:	image001.png image002.png image003.png image004.png Sightline Institute Comments on the One Seattle Plan DEIS 5-6-24.pdf

CAUTION: External Email

Hello –

Please find attached Sightline's comments on the One Seattle Plan DEIS in the form of an article we published on our website.

The article can be briefly summarized as follows:

1. Get the zoning details right for middle housing to ensure that its feasible to build and can provide family-size and accessible homes
2. Boost allowances for bigger apartment buildings throughout the city to create more homes more people can afford in places with access to opportunity and transportation options
3. Eliminate requirements for off-street parking citywide to end the wasteful, costly overbuilding of parking and make housing less expensive and more abundant

16-1

Thank you,
Dan

Sightline INSTITUTE

Dan Bertolet | Director, Housing & Urbanism Program | he/him

Sightline Institute | www.sightline.org |

I live and work on the traditional lands of the Coast Salish peoples, including the dxʷdəwʔabš (Duwamish) People, both past and present.

Sightline Institute is a nonpartisan, nonprofit think tank working to make Cascadia—from Alaska to Oregon and from the Pacific to the northern Rockies—a global model of sustainability. Subscribe to our email newsletters for policy analysis focused on housing, democracy, energy, and forest solutions, and support our work.

Sightline INSTITUTE

SEATTLE DESERVES A BETTER COMP PLAN

The city can make three critical fixes to its 20-year growth plan: Let middle housing be bigger, allow apartment buildings in more places, and legalize car-free homes everywhere.

Author: **Dan Bertolet**
(@danbertolet) on April 18, 2024 at 7:00 am

Sightline Institute Research

Seattle Deserves a Better Comp Plan

0:00 / 22:56 1X

Find audio versions of Sightline articles on any of your favorite podcast platforms, including Spotify, Google, and Apple.

Editor's note: Have your say as Seattle leaders collect community input. We've drafted a note for you to edit to your liking, and the Seattle Office of Planning Community Development is accepting comments until May 6 at OneSeattleCompPlan@seattle.gov.

Seattle is in the process of updating its Comprehensive Plan, its 20-year roadmap for growth. Chief among the policies it charts is, of course, housing. Seattle's chronic shortage of homes and the harm that has done to lower-income residents and communities is no secret to anyone.

Unfortunately, the draft plan falls far short of what's necessary to create a Seattle that welcomes households of all incomes. In short, it doesn't make enough room for more homes.

If adopted as proposed, more and more people will continue to be priced out of the city for decades to come. And the city will also fall further behind on goals to reduce climate pollution and sprawl.

The critical fix is straightforward: loosen zoning rules to allow more homes of all shapes and sizes. And Seattle can improve its draft Comprehensive Plan to make that happen in three key ways. (I cover them briefly in the numbered sections below, then expand on each in the rest of the article.)

1. LET MIDDLE HOUSING WITH MORE HOMES BE BIGGER

Allowing middle housing—small-scale homes like fourplexes—in places once reserved for detached houses is an imperative for creating more homes that more people can afford in lower-density neighborhoods.

The good news is that the 2023's Washington state bill HB 1110 requires Seattle to legalize middle housing in areas currently reserved for single-detached houses. Three-quarters of Seattle's residential land will be opened up to more housing, creating the potential for tens of thousands of new homes.

The bad news is that just allowing more homes per lot doesn't by itself guarantee anything will get built. That's because middle housing construction is usually not financially feasible unless zoning rules allow the buildings to add indoor space as their unit count goes up. Seattle's proposed Comprehensive Plan (Comp Plan, for short) doesn't do that, and instead would impose the same cap on buildable capacity as what currently applies to single-detached houses with accessory dwellings. This limitation would not only suppress the construction of middle housing but would also prevent any feasible projects from having family-sized homes.

The solution is to emulate Spokane's best-in-the-US middle housing zoning, which grants generous development capacity and flexibility. Or, at minimum, implement the middle housing capacity recommendations of Washington's Department of Commerce, which stipulate workable increases in capacity. More below.

2. ALLOW LARGER APARTMENT BUILDINGS IN MORE OF THE CITY

Apartment buildings five stories and up, near job centers, transit hubs, mixed-used nodes, schools, and parks, are essential for providing the level of density that both reduces cost and adds homes at the scale needed to address Seattle's shortage. Large multifamily buildings in compact, walkable, low-carbon neighborhoods also yield the biggest dividends on reducing climate pollution and sprawl.

Seattle's draft Comp Plan proposes only a modest amount of upzoning for apartment buildings. It recommends four- to six-story buildings in 24 newly designated "neighborhood centers" confined to just an 800-foot radius, and eight stories in a new urban center at the 130th Street light rail station. Otherwise, it proposes no apartment upzones anywhere else, excepting some slivers of land currently zoned for low density in designated centers, and possibly some 1/2-block strips along arterials.

Seattle's plan could rise to the moment by allowing highrise towers in all regional centers and near all light rail stations, eight-story buildings in all urban centers, and six-story buildings near frequent transit stops and other community amenities like parks. It could also designate more and larger neighborhood centers with apartment zoning.

That may sound like a lot of change, but it's still not European-caliber density, to say nothing of Asian standards. It's not even as ambitious as what neighboring British Columbia adopted in November—and not just in the biggest city of Vancouver but provincewide. More below.

3. LEGALIZE CAR-FREE HOMES EVERYWHERE

Requiring new housing to come with parking prioritizes storage for cars over homes for people. Parking reduces the amount of housing that can be built, while at the same time increasing its cost.

In 2012, Seattle eliminated parking mandates in its designated centers and reduced them near transit. But the city still requires off-street parking on large fraction of its residential land, especially in areas that will be zoned for middle housing, which is particularly vulnerable to death by parking mandate.

There couldn't be a simpler solution for avoiding the lose-lose outcome of more unneeded parking and less housing: Seattle can eliminate parking mandates citywide. This reform would not ban parking. Home builders could still include parking if they wanted to, and many no doubt would. Ending mandates only ensures that our laws no longer force the overbuilding of parking, and that translates to *more* new homes and *less expensive* new homes.

Already, Portland, Anchorage, Buffalo, Minneapolis, Austin, San Jose, Raleigh, Hartford, and 60 other North American cities have completely eliminated off-street parking requirements, freeing space for more homes. Seattle would do well to join this forward-thinking group of cities. More below.

WHY SEATTLE LEADERS NEED TO DO (A LOT) MORE WITH THE COMP PLAN

In a housing crisis caused by a shortage of homes, policymakers should do everything they can to allow more homes. Before I detail the three key fixes named above, some words about why Seattle leaders need to be bolder in their housing vision for the city's future.

The draft plan's target numbers are weak

Seattle's draft plan is based on a target of 100,000 new homes over the next 20 years. First, that's only 20,000 more homes than status quo projections expected, even with no changes to existing zoning. Second, an average rate of 5,000 new homes per year is far lower than the housing growth that has actually occurred in recent years. For example, from 2013 to 2023, Seattle added an average of nearly 8,500 new homes per year.

Zoned capacity ≠ built reality

Seattle planners estimate that current zoning has capacity for 168,000 more housing units, which may lead one to ask: why, then, does the city need to loosen zoning at all? The reason is that zoned capacity is a theoretical number that overstates reality. What I wrote in 2016 is even truer today:

> *Zoned capacity is not plentiful in Seattle. If it were, housing prices wouldn't be going through the roof. The fact that housing prices are skyrocketing is the smoking gun of our severe shortage. If vacancy rates are low and rents and housing prices are rising, then a city needs to remove zoning-code barriers so that builders can construct more homes.*

Go big, so more people can go home

There is no downside to erring on the side of too much upzoning that comes anywhere close to the catastrophic downsides of maintaining restrictive zoning that worsens Seattle's housing shortage. Today, far too many Seattleites face crushing housing insecurity caused by the zoning status quo. The strongest predictor of homelessness rates is high rents and low vacancy rates—both of which are caused by a scarcity of homes.

Are Seattle's leaders worried that they might let *too much* housing get built in a housing crisis? If not, then they should put their money where their mouth is and ensure that their next Comp Plan sets zoning policies to boost home building in every way possible.

Okay, back to the details for each of the three key improvements I named in the introduction.

Small apartment buildings like this one in Seattle's Capitol Hill neighborhood were once allowed almost everywhere in the city. Photo by Dan Bertolet.

GET THE DETAILS RIGHT FOR MIDDLE HOUSING

Zoning reforms in other parts of the US have demonstrated that even when middle housing is legalized, not much will be built unless the rules allow the buildings to be larger than single-detached houses.

Developing middle housing on small lots tends to be a money-losing proposition unless zoning allows more development capacity for projects that incorporate more homes.

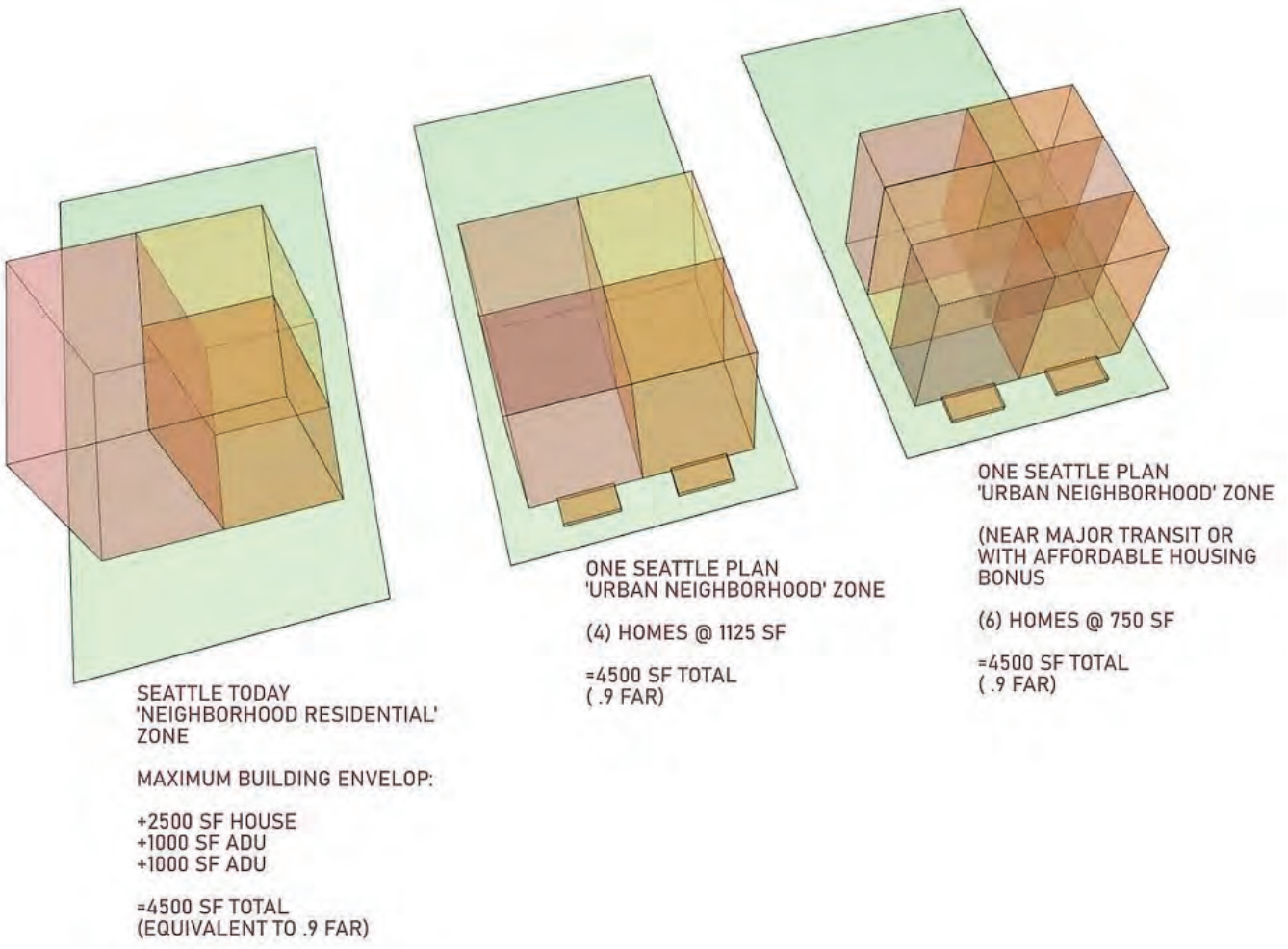
The earliest example is Minneapolis' 2019 legalization of triplexes, where only a handful have been built because the zoning caps their size at the same as standalone houses. Analysis of Portland's middle housing zoning showed that its incremental increases in capacity for more homes was still not enough to make construction feasible in most cases.

Washington's Department of Commerce took this into account when developing its middle housing model code (see Sightline's comments on the draft). It recommends granting an increasing amount of floor area ratio (FAR), starting at FAR 0.8 for duplexes and rising stepwise to FAR 1.6 for sixplexes.

Increase the FAR, especially to allow family-sized middle homes

Seattle's draft plan caps FAR at 0.9 for all middle housing, regardless of the number of units. That's the same FAR currently allowed for a house and two accessory dwellings on a standard 5,000-square-foot lot. It's a formula for an anemic pace of middle housing construction.

It's also a formula for essentially banning middle housing with family-sized homes. On a 5,000-square-foot house lot, FAR 0.9 means 1,125-square-foot units (on average) in a fourplex, or 750 square feet in a sixplex. If they are typical townhouses, the staircases eat up a large fraction of that already limited living space. For comparison, under the Commerce model code, a sixplex's units could be 1,333 square feet, enough for a three-bedroom apartment.



Seattle's draft Comp Plan proposes to cap FAR at 0.9 for all middle housing, which forces smaller homes as the unit count goes up and compromises the financial feasibility of construction. Image by CAST Architecture, used with permission.

Go beyond FAR, like Spokane

But Seattle's plan can aim even higher. Spokane set the bar for North America with the citywide middle housing zoning it adopted in late 2023. It limits building size not by FAR, but by lot coverage, setbacks, and height. It has no limit at all on the number of units on a lot. Its most restrictive tier would allow a four-story building with a FAR of just under 2.0. A typical 5,000-square-foot house lot could accommodate an eightplex with two approximately 1,200-square-foot apartments per floor, in a building covering half of the lot.

Enabled by Spokane's new zoning, the "Spokane Six" (see image above) currently in development demonstrates a sixplex prototype that Seattle's next-generation zoning should be tailored to allow. It would be impossible under Seattle's paltry proposed limit of FAR 0.9.

The "Spokane Six," a sixplex currently in development, enabled by Spokane's best-in-nation middle housing rezone. Image by CAST Architecture, used with permission.

Boost stacked flats > townhouses, especially for accessibility

Townhouses—attached homes divided vertically from each other and sold separately with the land underneath them ("fee simple")—are by far the most common type of middle housing built in Seattle today, and that will continue to be true under compliance with HB 1110 and under the city's draft Comp Plan (see the city's illustrations).

Townhouses work well for many households and provide an entry into ownership at a lower cost than detached houses. However, one major drawback is they are inaccessible to people who can't use stairs. In contrast, stacked flats like the Spokane Six can provide accessible, single-level homes on the first floor, and on higher floors, too, if there's an elevator.

In fact, federal law mandates that in multifamily buildings with four or more units, every ground-floor home must be wheelchair-accessible—good for people with disabilities and for the US's booming aging population, for whom aging-ready homes are drastically undersupplied to meet future demand.

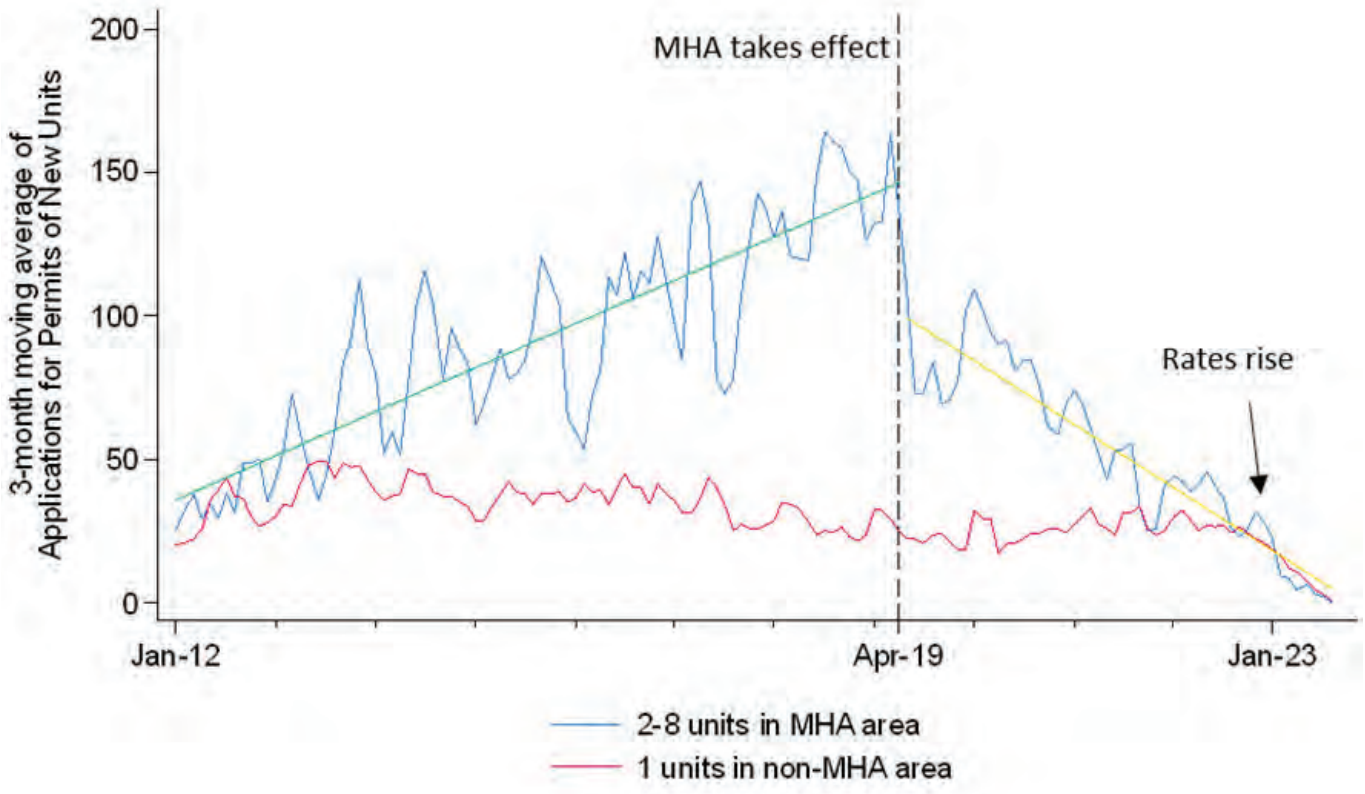
If Seattle hopes to see much stacked-flat middle housing construction, it will need to give it a leg up to overcome the inherent economics that favor townhouse development. Two good ways to do that:

1) Grant more FAR for stacked flats than for townhouses. The FAR of 1.6 recommended by Commerce would be sufficient.
2) Allow at least six units per lot for any stacked-flat development. Or better yet, remove the unit cap altogether, as Spokane did.

Avoid the poison pill of affordability requirements

Seattle's brand of inclusionary zoning (IZ), called "mandatory housing affordability" (MHA), applies to middle housing where it is currently allowed, requiring builders to include below-market-rate homes or pay a "fee in lieu" into the city's affordable housing fund. The draft plan is mute on MHA, though it's safe to assume that it will be considered when rezones are implemented.

In 2017, Sightline's analysis projected that MHA would be particularly harmful to middle housing production. Since then, studies of permit data (see graph below) and avoidance support that conclusion.



Seattle permits for townhouse construction dropped after April 2019, when the city adopted its MHA program that requires affordable units or payment of an in-lieu fee. Interest rates rose in 2023, long after the decline in production began. Sources: City of Seattle data and American Enterprise Institute, used with permission.

It is generally accepted that affordability requirements are a bigger financial hurdle for small-scale home builders, and IZ programs in other cities commonly exempt small projects, say, with 10 units or fewer. The architects of Washington's middle housing bill, HB 1110, recognized this limitation and did not mandate affordability but instead granted the *option* to add more homes if a portion were set aside as affordable. The Pacific Northwest's leaders on middle housing reform, Portland and Spokane, do not require IZ for middle housing.

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Best available evidence indicates that imposing MHA with Seattle's future middle housing upzones would undermine the intent of the upzoning in the first place. It would suppress middle housing construction, depriving residents of less expensive housing choices and prolonging the city's dire housing shortage that harms those with the least, the most. Seattle policymakers can maximize all the benefits of middle housing with one simple move: *don't impose MHA on it.*

A six-story apartment building in Seattle's Queen Anne neighborhood. Photo by Dan Bertolet.

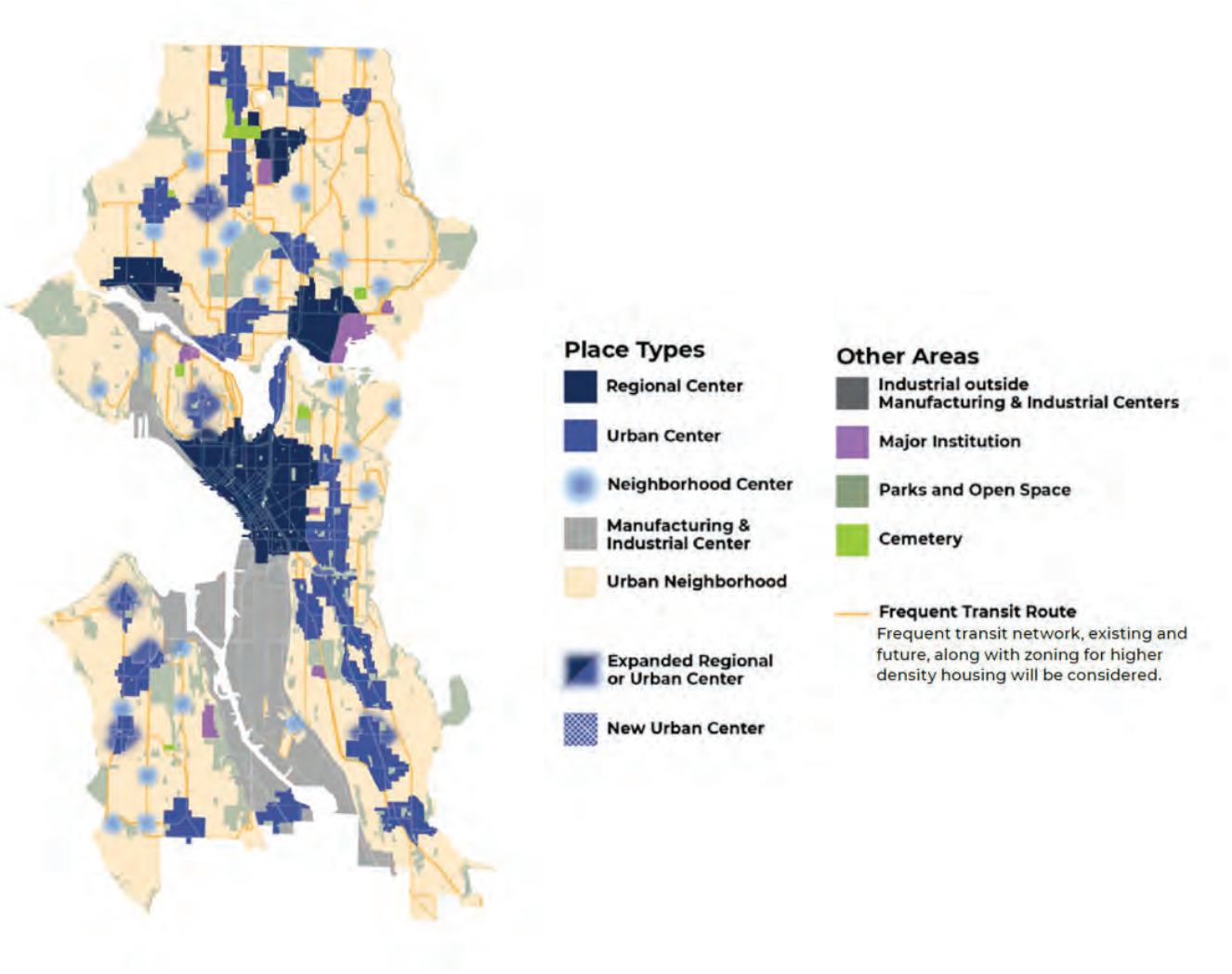
CREATE APARTMENT BUILDING ABUNDANCE

Over recent decades, the vast majority of Seattle's new housing has come in the form of apartment buildings, four stories and up. Seattle's past planners deserve credit for creating the multifamily zoning that largely enabled the city's population to grow from 563,000 to 779,000 between 2000 and 2023, a gain of 38 percent—while the population in Seattle's single-family areas largely stagnated or even declined.

Allow apartments in more places

The catch is that Seattle's zoning for larger apartments is confined to a small fraction (about 13 percent, not including lowrise zones) of its residential land, located almost entirely in designated urban centers and villages and along arterial streets. Seattle's booming growth and robust job creation has rendered

that 30-year-old strategy of confinement insufficient for meeting the city's housing needs. Furthermore, the city's own study concluded this "urban village" strategy has exacerbated racial segregation and inequity.



Draft Seattle Comprehensive Plan future land use map and legend showing locations of newly designated neighborhood centers (faded light blue) and other types of centers. Source: City of Seattle.

As noted above in the intro, the draft Comp Plan proposes only a modest amount of upzoning for apartment buildings in new areas, and leaves zoning almost completely untouched in the limited places where they are now allowed. Seattle's plan can expand opportunities for apartments and condos in multiple contexts and scales by allowing (see map above for reference):

> Highrise towers throughout all regional centers and within a quarter-mile of all light rail stations outside regional centers,
>
> Eight stories throughout all urban centers, and
>
> Six stories within a quarter-mile of all frequent transit stops, schools, parks, libraries, and community centers.

Add more "neighborhood centers," and enlarge them

The city can further expand apartment choices by designating more neighborhood centers and making them larger. The draft plan states that in these centers, "residential and mixed-use buildings of four to six stories would be appropriate."

These two changes would be especially beneficial for creating opportunities for apartments located away from dangerous, polluted, and noisy arterial roads, where current apartment zoning is concentrated. Plentiful apartment zoning also supports the development of subsidized affordable housing, because its most common form is midrise apartment buildings.

An earlier proposal identified some 48 potential neighborhood centers, but only 24 made their way into the draft plan officially released last month after Mayor Bruce Harrell's office scaled back changes (compare this map from the earlier draft with the one shown above). Also, the proposed size for neighborhood centers is only an 800-foot radius, which is just a few blocks. A quarter-mile radius would allow the critical mass for a functional center.

New highrise residential towers in Seattle's South Lake Union neighborhood. Photo by Dan Bertolet.

Follow Portland's example, in apartments and in funded affordability mandates

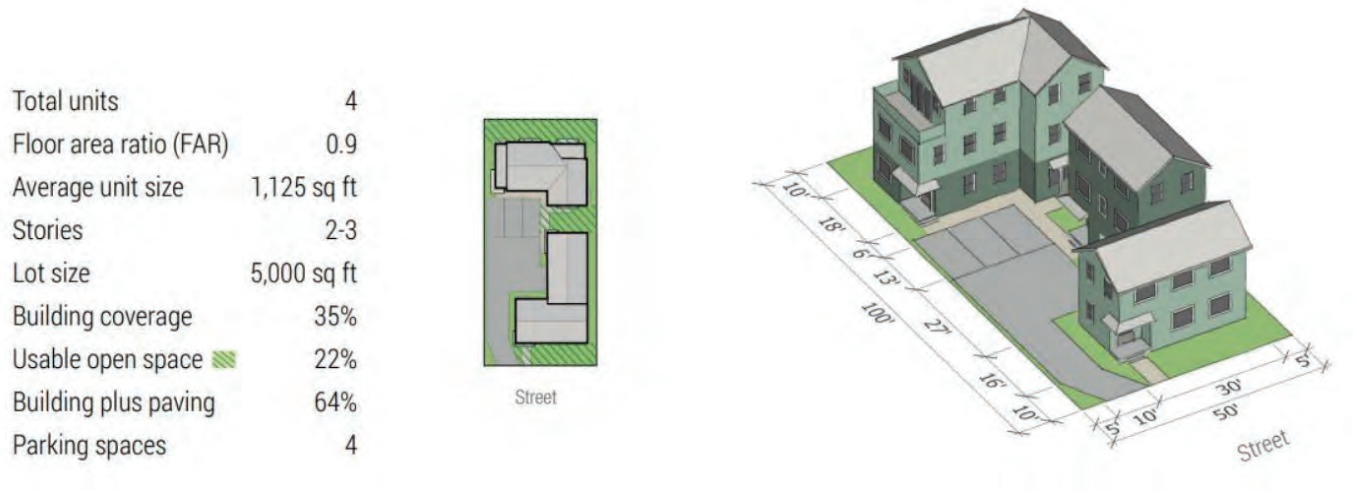
Portland, Oregon, is poised to lead the US in allowing more apartments, the next logical step after that city's 2020 legalization of middle housing citywide. An advocate-led effort proposes legalizing midrise apartment buildings throughout the city's Inner Eastside neighborhoods.

Seattle policymakers can also look to Portland for a better way to do IZ—namely, one that doesn't undermine its own intent by suppressing construction. Earlier this year, Portland modified its IZ program to ensure that the cost of providing the required affordable homes is fully offset by a property tax exemption and other fee reductions. That is, Portland fully funds its IZ. It's a win-win-win: apartment construction continues apace, every new apartment building includes some homes for lower-income residents, and the new building's property tax revenue pays for its new low-income units.

SAY GOODBYE, ONCE AND FOR ALL, TO COSTLY PARKING MANDATES

Seattle's draft Comp Plan does a good job of summarizing how requiring off-street parking is bad policy because it "increases the cost of construction; reduces the amount of space available for housing, open space, and trees; increases hardscape and stormwater runoff; and encourages vehicle ownership and use."

The plan further explains that parking mandates are especially problematic for middle housing: "On small lots, driveways, maneuvering areas, and parking stalls can take up a substantial portion of the site and dictate the layout of everything else on the site." See the city diagram below for an example of how much space parking eats up on a standard lot.



City of Seattle diagram of potential middle housing with four units per lot, illustrating the large portion of the site taken up by pavement for four parking spaces. Source: City of Seattle.

Sightline has documented in detail how parking mandates are a death knell for middle housing, concluding that "to unlock the full potential of small-scale homes, there is no policy debate: parking minimums have to go."

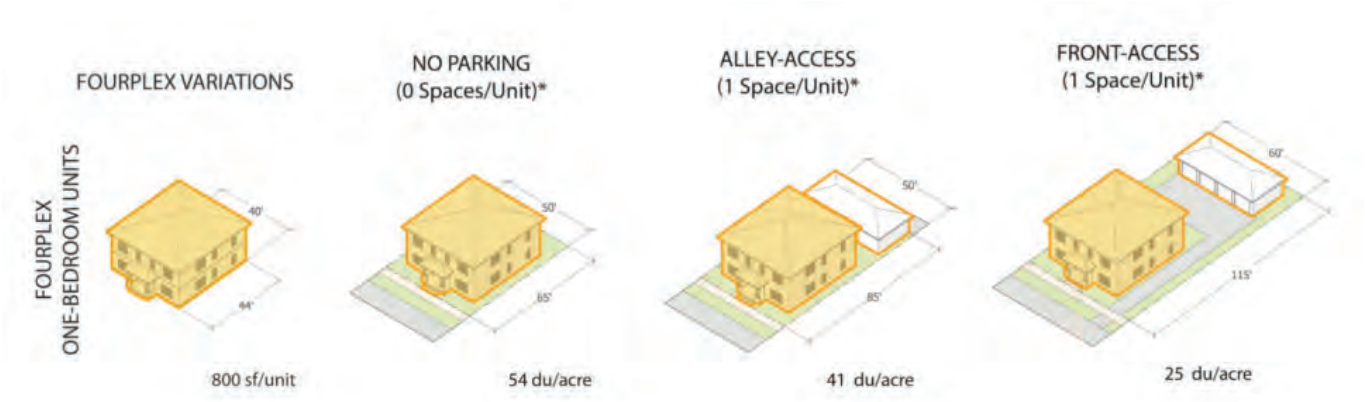
Meanwhile, the only benefits of off-street mandates offered by Seattle's draft plan are that they can "reduce competition for parking on the street" and "support goals like providing space for electric vehicle charging."

The plan's assessment is both clear and accurate: the benefits of ending mandates vastly outweigh the benefits of keeping them. Yet the plan takes no position, stating only that the city is "considering

whether to remove parking requirements in remaining areas where they are present today."

Seattle's current rules for parking flexibility apply within a quarter-mile of frequent transit stops. For residential parcels that are also located inside designated urban centers or villages, no parking is required. Otherwise, parcels with quarter-mile transit proximity get a 50 percent reduction from the city's standard parking mandates.

This map shows all the land eligible for parking flexibility, but it doesn't differentiate between areas with full elimination versus 50 percent. Urban centers and villages cover a small fraction of Seattle's residential land, so a large portion of the dark areas in the map still require some parking. Even a mandate of one space for every two homes can be a deal breaker for middle housing.



Requiring one parking space per home for a fourplex can reduce the density by one half. From Missing Middle Housing by Daniel Parolek, Chapter 5 Missing Middle Housing Types, pages 130-131. Copyright © 2020 Daniel Parolek. Reproduced by permission of Island Press, Washington, D.C.

Complete HB 1110's unfinished business on parking flexibility

Ideally, HB 1110 would have prohibited local parking minimums for middle housing, but it almost certainly would not have passed the legislature with that additional, politically controversial pre-emption.

The bill did, however, include a provision to make it easier for cities to remove their mandates. It exempts from state environmental review any actions local governments take to reduce parking requirements. Seattle, the biggest, most urban city in Washington, can complete the unfinished business of HB 1110 on parking and set an example for the entire state. Washington's current leaders on parking reform are Spokane, which nixed requirements on nearly all of its residential land, and Port Townsend, which ended all mandates but with an ordinance that's only temporary.

If Seattle policymakers retain parking mandates, they are choosing to prioritize reducing competition for street parking over creating homes for people—in a housing crisis.

Of course, many builders will opt to include parking with middle housing even if it's not required by law. But if it is required by law, many middle housing projects will become more expensive or will never get built at all.

If Seattle policymakers retain parking mandates, they are choosing to prioritize reducing competition for street parking over creating homes for people—in a housing crisis. Correcting that priority is easy: just use the delete key on Seattle's remaining off-street parking mandates, joining the wave of hundreds of other American cities making similar reforms.

SEATTLE CANNOT AFFORD TO MISS THIS OPPORTUNITY

Seattle updates its Comprehensive Plan only once every eight to ten years, and the new housing it shapes will be around for 50 to 100 years. The housing security of thousands—tens of thousands—of current and future residents depends on the city embracing a plan to allow enough new homes, in all shapes and sizes, over the coming decades. Seattle's crisis of spiralling rents and prices, caused by a shortage of homes, calls for policymakers to take every action possible to undo that shortage.

Sadly, the city's current draft plan does not do this. It proposes some positive steps, but overall, it fails to move much beyond the status quo that created Seattle's housing problems in the first place. An earlier, unpublished version of the draft plan put forward by the planning department did propose more aggressive changes to allow more housing, but Mayor Harrell's office scaled it back before it was officially released.

Seattle's plan can meet the moment with three key improvements:

1) **Get the zoning details right for middle housing** to ensure that its feasible to build and can provide family-size and accessible homes
2) Boost allowances for **bigger apartment buildings throughout the city** to create more homes more people can afford in places with access to opportunity and transportation options
3) **Eliminate requirements for off-street parking citywide** to end the wasteful, costly overbuilding of parking and to make housing less expensive and more abundant

With these reforms and the abundant housing they help create, Seattleites for decades to come will benefit from greater affordability and environmental sustainability.

Dan Bertolet
Senior Director, Housing and Cities

Letter 17

From: Eugenia Woo
To: PCD_CompPlan_EIS
Cc: Holmes, Jim
Subject: DEIS comments One Seattle Plan
Date: Monday, May 6, 2024 5:01:37 PM

CAUTION: External Email

Hi Jim,

On behalf of Historic Seattle, I am submitting these comments on the DEIS for the Comprehensive Plan update (One Seattle Plan), focused on the historic preservation and cultural resources section and mitigation measures of the DEIS.

I have one correction:
-Regarding "Exhibit 3.9-13. Area 2: NE Seattle—NRHP- and WHR-Listed Architectural Districts and Properties," I have a correction. The Nuclear Reactor Building at UW was listed in the National Register but it was demolished by the UW in 2016. 17-1

Under Potential Mitigation Measures, I would like to know more about "Modifying demolition review process so that historic review occurs even if SEPA thresholds are increased." 17-2

Thank you!

Eugenia

Eugenia Woo
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Letter 18

May 6, 2024

City of Seattle Office of Planning and Community Development
P.O. Box 94788, Seattle, WA 98124-7088
PCD_CompPlan_EIS@seattle.gov
OneSeattleCompPlan@seattle.gov

Attn: Director Rico Quirindongo, Michael Hubner, Jim Holmes, Brennon Staley

Subject: One Seattle Comprehensive Plan Update Draft EIS Comments and One Seattle Comprehensive Plan: Draft for Public Review Comments

Dear Director Quirindongo and OPCD staff,

Thank you for the opportunity to comment on the "One Seattle Comprehensive Plan Update Draft EIS" (DEIS) and the "One Seattle Comprehensive Plan: Draft for Public Review" ("Draft Plan"). Please find the comments of the Complete Communities Coalition listed below. We have included section headers to indicate the document to which each comment pertains.

The Complete Communities Coalition is an alliance of affordable housing advocates, community-based organizations, nonprofit developers, urbanists, environmentalists, the local business community, and more. Our coalition is dedicated to fostering an affordable, equitable, and sustainable Seattle through a transformational 2024 Comprehensive Plan Update. We seek to guide Seattle towards a future with abundant housing and inclusive growth.

We appreciate the Department of Planning and Community Development's (OPCD) work that produced the Draft Plan. We strongly share the values expressed in the Draft Plan and we concur with much of the Department's analysis of the challenges facing the city and their root causes. However, we are concerned that the plan will not achieve its desired goals because many of the policies are too similar to the City's current policies to create significant change. To truly make housing more affordable, advance racial equity, mitigate displacement, and meet our climate goals, we believe the Mayor's Recommended Plan and the Final Environmental Impact Statement ("FEIS") should incorporate the following revisions:

COMPLETE COMMUNITIES COALITION

Steering Committee

Jesse Simpson, Co-Chair
Housing Development Consortium

Tiernan Martin, Co-Chair
Futurewise

Scott Berkley,
Tech 4 Housing

Cliff Cawthon,
Habitat For Humanity Seattle–King & Kittitas Counties

Sarah Clark,
Seattle Metropolitan Chamber of Commerce

Joshua Friedmann,
Hillis Clark Martin & Peterson P. S. & NAIOP Washington

Tiffani McCoy,
House Our Neighbors

Rian Watt,
The Urbanist

18-1

EIS Preferred Alternative

We recommend that the FEIS designate a "preferred alternative." While FEIS documents prepared pursuant to SEPA are not required to designate a preferred alternative, there is a sound reason why doing so has become common practice among lead agencies over the years. As the Department of Ecology has explained, designation of a preferred alternative gives public reviewers more awareness of which alternative the professional staff members within the lead agency feel is best, or which appears most likely to be approved. In the high-profile, contentious and complex instance of the One Seattle Plan, identification of a preferred alternative in the FEIS would be an especially useful step. Not only has the DEIS discussed and analyzed five different alternatives, but two different complex alternative proposals have also entered public discussion in the form of the Mayor's Draft Plan and the August 2023 OPCD staff recommended plan ("OPCD Draft Plan", see Attachment A).[1,2] Given the sprawling and complex interrelated impacts that the One Seattle Plan will have on the future of our City, the FEIS will be best positioned to inform productive discussion and understanding if it clearly designates a preferred alternative.

18-1 cont

- The growth strategy described by OPCD staff in their August 2023 proposal should be the basis for the preferred alternative. The OPCD Draft Plan is the boldest growth strategy presented to date. It responds to the overwhelming community feedback provided during scoping, and we believe it will best meet the city's needs over the next decades.

- If the FEIS does not designate the growth strategy from the OPCD Draft Plan (or an updated version) as its preferred alternative, it should adopt a modified version of the DEIS's Alternative 5. Preferably, modifications to the DEIS Alternative 5 would incorporate as many attributes of the OPCD Draft Plan as possible, and as many of the policy positions requested in this letter as possible.

- If the FEIS adopts theDraft Mayor's Recommended Plan growth strategy as a preferred alternative, it should adopt many of the features of the OPCD Draft Plan or DEIS's Alternative 5, together with the additions requested by this letter.

- The FEIS should include a table that summarizes zoned land development capacity analysis and projected housing needs for the Preferred Alternative. The table should disaggregate housing unit development by area mediam income ("AMI") band,

[1] See The Urbanist. "Planners Proposed Bigger Upzones Before Harrell's Team Intervened, Records Show", April 16, 2024.
https://www.theurbanist.org/2024/04/16/planners-proposed-bigger-upzones-before-harrells-team-intervened-records-show/
[2] Also see PubliCola. "Mayor's Office Edited Ambitious Growth Plan for Seattle to Preserve the Status Quo", April 16, 2024.
https://publicola.com/2024/04/16/original-version-of-growth-plan/

following the guidance provided by the Department of Commerce, in order to ensure we are providing sufficient capacity for housing affordable to low-income people and demonstrate that the plan will comply with the Growth Management Act's Housing Element requirements provided in RCW 36.70a.070(2)(c)-(d). Table 34 in the Draft Housing Appendix provides an excellent template for this information.[3]

18-1 cont

Urban and Regional Centers

Regional and Urban Centers have been and will continue to be the areas where the most new housing is built in the city. Currently, the City is proposing very little change within existing centers, minor expansion of the smallest centers, and only one new center at NE 130th Street. The City should expand the potential for growth in Urban and Regional Centers by both increasing the area they cover and the intensity of development allowed. The City should also seek to undo the past harms of the Urban Village strategy[4], which is the basis of our centers-based growth framework, by allowing more intense development near public facilities such as parks, water ways, and high performance schools. The City should also take this opportunity to address the inequitable distribution of Regional Centers, none of which are currently located in South Seattle.

18-2

To facilitate iImmediate progress, the Mayor's Recommended Plan and any Preferred Alternative Should:

- Continue to include the addition of Ballard as a Regional Growth Center and 130th Street Station as an Urban Center.
- Continue to include the expansions of existing Urban Centers such as the Greenwood-Phinney Ridge, Queen Anne, and West Seattle Junction Urban Centers.
- Expand the University District Regional Center to include University Village and lands adjacent to Seattle Children's Hospital, or create a new Urban Center to incorporate these areas.
- Create additional Urban Centers at all future Link stations, excepting areas within Manufacturing and Industrial Centers.

[3] See City of Seattle. "Draft Housing Appendix", p.122. https://www.seattle.gov/documents/Departments/OPCD/SeattlePlan/OneSeattlePlanDraftHousingAppendix.pdf

[4] See PolicyLink. "Advancing Racial Equity as part of the 2024 Update to the Seattle 2035 Comprehensive Plan and Urban Village Strategy", April, 2021. http://www.seattle.gov/Documents/Departments/OPCD/OngoingInitiatives/Seattle'sComprehensivePlan/ComprehensivePlanPolicyLinkFinalRecommendations.pdf

- Allow high rise zoning in all Regional Centers and within all Urban Centers adjacent to Link Stations.
- Allow eight-story residential construction on the majority of the land within all Urban Centers. Explore allowing greater height with the use of mass timber, to incentivize low carbon construction.
- Designate Mt. Baker and West Seattle Junction Urban Centers as future Regional Centers, include them in the list of Centers to receive updated subarea plans, and plan for combined jobs and housing unit density that exceed King County's Urban Growth Center threshold for both centers.[5]

To facilitate continued innovation and flexibility in the months and years to come, the FEIS should:

- Study the maximum possible expansion of all existing Urban and Regional Centers.
- Study additional Urban Centers near all proposed Link Stations and adjacent to our greatest parks, including Discovery and Magnuson.
- Study increasing the zoning capacity of all Regional and Urban Center to maximize the productions of housing.
- Study the impacts of designating Mt. Baker and West Seattle Junction Urban Centers as Urban Growth Centers, using the definition provided in the 2021 King County Countywide Planning Policies.

18-2 cont

Neighborhood Centers

The One Seattle Plan's proposed "Neighborhood Center" model presents dramatic opportunities for our City. If fully realized, this could lead to increased housing supply and affordability, enhanced economic opportunities, improved walkability, and better environmental outcomes for more of Seattle's neighborhoods and a broader segment of the city's population. We request the following actions to bring the Council's request for a "fifteen minute city" and the Mayor's vision of "One Seattle" closer to reality.

18-3

To facilitate immediate progress, the Mayor's Recommended Plan and any Preferred Alternative should:

- Allow for the development of all Neighborhood Centers studied under EIS Alternative 5 and proposed under the OPCD Draft Plan. The total number of Neighborhood

[5] The current activity unit density minimum is 30 units/acre and the planned activity unit density is 60 units/acre. See Attachment B: DEIS Alt 5 and Growth Center Designation Criteria Tables

Centers should not be less than 50. Additional Neighborhood Centers should include (but not be limited to): Alki, High Point, Seward Park, South Beacon Hill, Gas Works, North Magnolia, Roanoke Park (North Broadway), Nickerson (North Queen Anne), and Upper Fremont.[6]

- Expand the radii of Neighborhood Centers to ¼ mile to create enough land to support a small cluster of mixed-use development.
- Increase permitted Floor Area Ratio (FAR) to no less than 2.0 for multifamily housing in all Neighborhood Centers.
- Increase height limits to 85 feet throughout all Neighborhood Centers.

18-3 cont

To facilitate continued innovation and flexibility in the months and years to come, the FEIS should:

- Study expanding all Neighborhood Centers up to a ten-minute walkshed and 2.5 maximum FAR, for all multifamily housing across those areas.
- Be sure to thoroughly study any potential adverse environmental impacts of these actions, as well as the probable significant adverse environmental impacts of failing to take such measures.

Corridors

The DEIS studies a "Corridor" growth strategy (Alternative 4) that would focus new housing in areas near transit and amenities. Increasing access to frequent transit and parks is one of our coalition's goals, and it will help the City reduce cost of living while improving quality of life. While the DEIS includes this strategy, the Draft Plan significantly reduces the amount of area where such flexibility and walkable density would be possible. This is inconsistent with the Mayor's One Seattle goals for housing, transportation, the environment and the climate. By restoring multifamily housing to the parcels off of arterials, the Mayor's Recommended Plan can avoid disproportionately exposing renter households to environmental harms caused by high-traffic roadways. This would be more consistent with the City's One Seattle values of racial and environmental justice.

18-4

To facilitate immediate progress, the Mayor's Recommended Plan and any Preferred Alternative should:

[6] The Neighborhood Center names listed in this comment refer to the names provided in City of Seattle, "Additional Detail on Location of Neighborhood Anchors", 2023. https://www.seattle.gov/documents/Departments/OPCD/SeattlePlan/LocationsNeighborhoodAnchorsStudiedAlternative2.pdf

- Add a Corridor place type that allows mid rise housing up to 85 feet in height. This place type should include all parcels currently zoned Neighborhood Residential that are:
    a. within 0.5 miles (roughly a 10-minute walk) of light rail or bus rapid transit; or
    b. within 0.25 miles (roughly a 5-minute walk) of frequent bus stops.
- Where appropriate, add the Corridor place type to policies that reference the three centers (Regional, Urban, and Neighborhood).
- Impose a maximum FAR no lower than 2.0 for multifamily development in Corridor areas.
- Allow mixed-use residential development in Corridor areas.

To facilitate continued innovation and flexibility in the months and years to come, the FEIS should:

- Study all Corridor areas contemplated by EIS Alternative 5 or the OPCD Draft Plan up to a ten-minute walkshed, and no less than 2.5 maximum FAR for all multifamily housing across those areas.
- Be sure to thoroughly study the probable significant adverse environmental impacts of failing to take such measures.

18-4 cont

Urban Neighborhoods & Middle Housing

This section focuses on the One Seattle plan's implementation of HB 1110 (2023) in Neighborhood Residential Areas and throughout the city. Full implementation of the state law needs to be planned to ensure we encourage a diversity of housing types, including backyard cottages, co-housing, townhouses, and stacked flats. Urban Residential zones need to be planned to help us meet our equity, environmental, and affordability goals.

18-5

To facilitate immediate progress, the Mayor's Recommended Plan and any Preferred Alternative should:

- Increase the allowed FAR for middle housing to feasibly allow for family-sized two, three, and four bedroom homes to be built throughout the city. At a minimum, the city should align standards with the Department of Commerce's model ordinance. We recommend no less than 1.4 FAR for fourplexes and no less than 1.6 FAR for six-plexes.
- Create a 0.2 FAR bonus for stacked flats in middle housing, to incentivize the creation of physically accessible housing.

- Create a 0.1 FAR bonus for each Multifamily Tax Exemption (MFTE) unit, along with increasing height to 40 feet if two or more MFTE units are included.
- Encourage the development of housing for large households, including families with children and elders, by providing a development incentive of 0.05 additional FAR for two-bedroom homes and 0.1 additional FAR for three- or four-bedroom homes.
- Create a 0.2 FAR bonus for housing that satisfies defined passive house, living building, or LEED specifications.
- Allow for a full range of middle housing types in Neighborhood Residential areas throughout the city, including allowing for six-plexes by right in all areas with low displacement-risk.
- Align the Draft Plan with HB 1110, by ensuring any alternative density requirements in high-displacement risk areas are temporary. Create a plan for implementing appropriate anti-displacement policies by the next implementation progress report. Partner with BIPOC-led community organizations to engage neighborhood and community residents, both present and former, to better understand how to accommodate their housing needs and improve community resilience.
- Eliminate requirements for side and front setbacks, to allow for more of the lot to be usable open space and accommodate trees.
- When calculating minimum density, do not include ADUs and DADUs in the unit density metric.
- Allow subdivision of lots into lots less than 1,000 square feet.
- Ensure that middle housing is not subject to more restrictive land use or other code requirements than single family housing, as required under HB 1101.
- Expand the “corner store” concept to allow greater flexibility for commercial uses to be introduced to neighborhoods that are currently primarily residential. Examples of greater flexibility include: non-residential uses that meet the daily needs of residents (e.g., health care, small grocers, “third place” leisure activities, etc.), ability to locate on off-corner lots, and increased height and FAR limits to facilitate the development of ground floor commercial units.

18-5 cont

To facilitate continued innovation and flexibility in the months and years to come, the FEIS should:

- Study the impacts of removing side setback requirements in all areas, to allow for more of the lot to be usable open space and accommodate trees.

Affordable Housing and Social Housing

The City of Seattle is facing a housing crisis in terms of scarcity and affordability. One of the goals of the One Seattle Plan, which we strongly support, is to achieve housing abundance:

"When housing is safe, affordable, and abundant, we can fulfill many of our goals for the future….Achieving housing abundance is fundamental to addressing our homelessness crisis, redressing historical patterns of segregation and exclusion, and creating opportunities for displaced residents to return to their communities."

18-6

We appreciate the inclusion of the affordable housing bonus to address this pressing need, by allowing for additional development capacity for income-restricted affordable housing in neighborhood residential areas that are within ¼ mile of frequent transit. Though we have not seen a detailed proposal for the income restrictions and set aside requirements, it is our understanding that this bonus is intended for use by non-profits and others building wholly affordable housing projects. This will blunt the impact of the proposed density bonus, as any developments benefiting from the bonus will need to compete for limited public funds available for affordable housing.

To facilitate immediate progress, the Mayor's Recommended Plan and any Preferred Alternative should:

- Revise the proposed affordable housing bonus to ensure it is usable by a broad range of developers–including private, nonprofit, and social housing developers–without needing scarce public funding. This could look like a requirement for no less than 20% of the homes to be affordable at 60% AMI for rental or 80% AMI for ownership.
- Increase the proposed FAR limit from 1.8 to no less than 2.2.
- Increase the proposed lot coverage from 60% to 70%.
- Allow the proposed affordable housing bonus to be used outside of frequent transit areas.

To facilitate continued innovation and flexibility in the months and years to come, the FEIS should:

- Study the impacts of allowing up to 80% lot coverage for developments using the affordable housing bonus.

Equitable Development and Anti-Displacement Strategies

The City currently provides support to communities disproportionately impacted by displacement pressure, economic exclusion, and disinvestment through a variety of different equitable development programs and anti-displacement policies. We support the continuation of all existing equitable development and anti-displacement tools, notably the Equitable Development Initiative. However, it is not enough for the City to simply continue its current programs; the tools and policies need to be expanded based on feedback from communities disproportionately impacted by discrimination and displacement pressure. 18-7

To facilitate immediate progress, the Mayor's Recommended Plan and any Preferred Alternative should:

- Expand the City's land banking strategy to support affordable rental, affordable ownership, and social housing projects.
- Create incentives and provide technical assistance for small community-based organizations to partner with larger developers in Equitable Development Initiative projects.
- Facilitate generational wealth building, by providing a way for low-income and fixed-income families to sell their home and gain a new high-quality home on the site of the new development.
- Collaborate with the Seattle school district to plan for affordable, family-sized housing near schools, pursuant to City Ordinance 124919.[7]
- Provide information to support the development of Community Opportunity to Purchase Act (COPA) legislation, which would allow qualified non-profit organizations the first opportunity to make an offer on real estate sales involving multifamily buildings with low-income residents.[8]
- Incentivize the use of affirmative marketing and community preference policies for private developments not receiving public subsidy. Continue to incentivize such policies for publicly-funded projects.

[7] City Ordinance 124919 states: "WHEREAS, a 2015 amendment to the Countywide Planning Policies approved by the Growth Management Planning Council of King County requires coordination between local land use plans and school districts" and Section 3.14.990 Office created---Functions, Section B.5., "In coordination with the Department of Education and Early Learning and in partnership with the Seattle School District No.1, OPCD will develop planning strategies that support the District's public school facility needs for anticipated student population consistent with adopted comprehensive plan policies and growth forecasts."

[8] This is supported by the 2021 Racial Equity Analysis, which advocated for land value capture tools after upzoning.

- Continue to explore and support the expansion of short-term rental assistance programs.

To facilitate continued innovation and flexibility in the months and years to come, the FEIS should:

18-7 cont

- Study the impact of displacement and lack of affordable housing on school enrollment and ensuing school budget constraints and create incentives for family-sized units near schools.

Multifamily Housing Mapping Error

The Draft Plan appears to include an unintentional mapping oversight which, if not corrected, would likely result in a loss of *existing* zoned housing capacity and a reduction in the fifteen-minute walkable neighborhoods envisioned by the Mayor's One Seattle policies and championed by the City Council. This loss would be found in neighborhoods that are today designated for "Multifamily Housing" future land uses *under the currently effective Comprehensive Plan*, but erroneously have been proposed to transition into Urban Neighborhood status under the Draft Plan.[9] This change would replace a designation in the current Comprehensive Plan where "you might find duplexes or townhouses, walk-up apartments or highrise towers," with a new place type that "would primarily allow housing types within a three-story scale, such as detached homes, duplexes, triplexes, fourplexes and stacked flats."[10] A ceiling of stacked flats in the proposed designation is much reduced from a ceiling of highrise towers in the existing designation. In particular, this issue would impact the proposed redevelopment of Fort Lawton with affordable housing , which is a major priority of the City of Seattle and Mayor's Office.

18-8

To preserve affordability, walkability and environmental progress made over the last ten years, the Mayor's Recommended Plan should:

- Ensure that all areas that are currently designated as Multifamily Residential on today's future land use map be redesignated as a Corridor, Neighborhood Center, Urban Center or Regional Center, rather than Urban Neighborhood.

Transportation

Safe, accessible,and frequent transportation is a key element to the success of any city. We strongly support Goal TG 1 in the Draft Plan, which states, "Transportation decisions,

18-9

[9] See Attachment C: Urban Neighborhood Areas Overlayed by FLUM 2035 Multi-Family Residential Areas for a graphic depiction of the multifamily housing mapping error.
[10] *Compare* Seattle 2035 Comprehensive Plan (Amended December 2022) at p. 53 with One Seattle Plan Draft EIS at 1-8 and 2-3.

strategies, and investments support the growth strategy for the City and the region and are coordinated with this Plan's land use goals." In order to achieve this, Seattle should prioritize *proximity*-based strategies over mobility-based ones.[11] One example of this approach would be to plan for far more Neighborhood Centers than are included in the Draft Plan—especially in low-density, car-dependent neighborhoods (see the Neighborhood Centers section of this letter). In its mobility strategy, Seattle should prioritize carbon-neutral transportation modes such as walking, rolling, and cycling, and carbon-light modes such as mass transit and carpooling. Transportation infrastructure that primarily serves personal automobiles, including parking, should be deprioritized in relation to these other modes.

18-9 cont

To facilitate immediate progress, the Mayor's Recommended Plan and any Preferred Alternative should:

- Plan to accommodate housing and job growth in a manner that will enable the City to achieve the following transportation and environmental goals: net-zero citywide emissions by 2050 (see T 4.1), 20% reduction in VMT by 2044 (see T 4.2), and a 37% reduction in VMT by 2044.
- Eliminate parking minimum requirements for all land uses types citywide.
- Plan to serve all Neighborhood Centers with frequent bus service.
- Add the Corridor place type to the lists of places described in T 1.2, T 3.1, and T.2.12; for example, "all centers (Regional, Urban, and Neighborhood) and corridors".
- Clarify that T 4.4, which describes neighborhood-scale strategies to reduce carbon emissions and pollution, applies to all types of neighborhoods—including neighborhoods with high-traffic arterial streets with frequent transit service.
- Use a racial equity lens when prioritizing sidewalk and pedestrian infrastructure construction in areas that currently lack it (see T 3.20).
- Plan to prioritize street right of way differently in different contexts: within centers and neighborhoods, streets should prioritize active transportation that is safe and sustainable; between centers and neighborhoods, streets should prioritize public transit; and within and between Manufacturing and Industrial Centers, streets should safely accommodate the reliable movement of goods.

[11] See Todd Litman. "Planning for Accessibility: Proximity is More Important than Mobility", Planetizen, April 14, 2024. https://www.planetizen.com/blogs/128363-planning-accessibility-proximity-more-important-mobility

To facilitate continued innovation and flexibility in the months and years to come, the FEIS should:

18-9 cont

- Study the environmental impacts of maximum parking requirements for residential and commercial uses in frequent transit service areas.

Climate & Environment

The City is preparing to comply with new climate requirements that will be required by state law in 2029. We support the City's decision to get ahead of these upcoming requirements, and we applaud the goal of 58% reduction in greenhouse gas emissions from 2008 levels. We also support the City's study of the environmental impacts of planning for additional density within Seattle, which found that DEIS Alternative 5 would produce the lowest GHG emissions per capita. We particularly support the following statement in the DEIS:

18-10

While each [EIS] alternative would generate GHG emissions from growth and development within the city, the benefit of channeling development to targeted areas that might otherwise occur in peripheral areas of the city or region could serve to offset these impacts. (DEIS, p.3.2-51)

We encourage the City to set additional specific climate goals that will allow for progress to be accurately assessed throughout the next twenty years.

To facilitate immediate progress, the Mayor's Recommended Plan and any preferred alternative should:

- Prioritize supporting transportation mode shift toward active mobility options over automobile electrification.
- Define specific anti-displacement strategies that meet the needs of communities most likely to be impacted by climate change.
- Set goals for building de-carbonization that can inform future revisions to the energy code.

To facilitate continued innovation and flexibility in the months and years to come, the FEIS should:

- Provide additional explanation for the conclusion that Alternative 1: No Action would have no significant adverse impacts on greenhouse gas emissions or air quality. Given the anticipated impacts that this strategy would have on greenfield development and increased vehicle-miles traveled, particularly by commuters, explain why these impacts would not be significant.

Thank you for considering our comments. If you require additional information, please contact Complete Communities Coalition Steering Committee co-chairs Tiernan Martin (tiernan@futurewise.org) and Jesse Simpson (jesse@housingconsortium.org).

Sincerely,

18-10 cont

Tiernan Martin and Jesse Simpson
Co-Chairs, Complete Communities Coalition Steering Committee

Attachments

This comment incorporates the following attachments by reference, and we ask that they be added into the public record as a part of these comments:

Attachment A: One Seattle Comprehensive Plan: Public Review Draft, August 2023

Attachment B: DEIS Alt 5 and Growth Center Designation Criteria Tables

Attachment C: Neighborhood Centers by Name and Location

Attachment D: Urban Neighborhood Areas Overlayed by FLUM 2035 Multi-Family Residential Areas

The Complete Communities Coalition requests the City of Seattle to include the following document in the public record:

City of Seattle. “One Seattle Comprehensive Plan: Public Review Draft”, June 2023. Accessible for download at: https://futurewiseorg.sharepoint.com/:b:/g/EYK_mzhgGw9CgVMoSvvajtwB1eTJkbe2RZ7UPQ-01Py57g?e=keR-Huq

Exhibit 3.6-112. Future Activity Units (AU)—Alternative 5

Center	Existing AU/Ac.	Alt. 1 AU/Ac.	Alt. 5 Acres	Alt. 5 AU	Alt. 5 AU/Ac.
Regional Centers[1]					
Downtown	377.4	473.2	952	447,351	469.9
First Hill/Capitol Hill	139.5	163.4	916	149,578	163.3
University Community	54.5	70.2	753	52,695	69.9
South Lake Union	236.7	344.1	340	115,612	340.2
Uptown[2]	113.3	181.3	391	53,723	137.2
Northgate	57.3	75.1	412	30,803	74.7
Ballard[2]	67.7	96.9	495	50,047	101.0
Hub Urban Centers[1]					
Bitter Lake Village	44.0	55.4	364	20,044	55.1
Fremont	72.9	98.1	214	18,877	88.0
Lake City	57.6	75.4	142	10,688	75.1
Mt Baker	36.8	47.4	491	23,135	47.1
West Seattle Junction[2]	70.4	100.2	449	26,934	59.9
Residential Urban Centers[1]					
130th Street[2]	18.4	20.7	218	7,733	35.5
23rd & Union-Jackson	38.9	46.5	625	29,046	46.5
Admiral[2]	49.2	60.4	288	6,886	23.9
Aurora-Licton Springs	44.1	51.4	327	16,775	51.3
Columbia City	33.9	46.1	335	15,390	46.0
Crown Hill	25.8	31.4	271	8,492	31.3
Eastlake	70.2	82.0	199	16,323	81.9
Green Lake	70.6	87.4	109	9,492	87.3
Greenwood-Phinney Ridge[2]	84.3	101.6	315	9,579	30.4
Madison-Miller	65.8	85.1	145	12,349	85.0
Morgan Junction[2]	34.1	41.6	281	7,169	25.5
North Beacon Hill	28.1	34.3	267	9,161	34.3
Othello[2]	23.7	29.0	584	17,894	30.6
Rainier Beach	23.0	26.0	346	12,893	37.3
Roosevelt	61.4	81.2	170	13,801	81.1
South Park	14.7	18.5	263	7,951	30.2
Upper Queen Anne[2]	89.5	110.5	329	5,857	17.8
Wallingford	42.2	51.3	258	13,248	51.4
Westwood-Highland Park	27.9	32.6	275	9,386	34.1

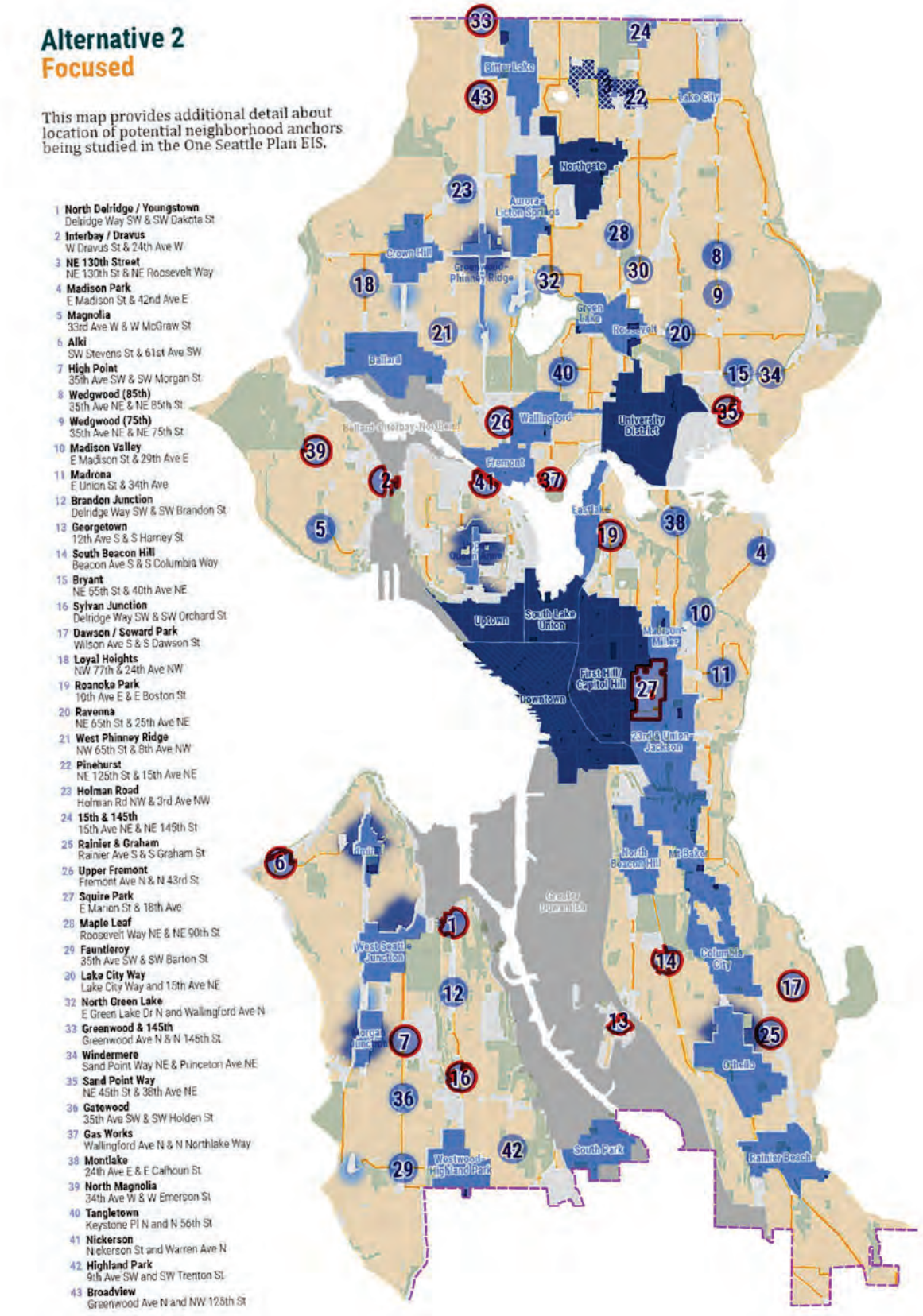
1 See **Exhibit 2.1-1** in **Chapter 2** for a cross-walk of existing place types (existing and Alternative 1) versus proposed place type names under Alternatives 2-5.
2 Proposed new center, redesignated center, or boundary expansion.
Note: Activity units (AU) is the sum of residential population and jobs. Assumes an average household size of 2.05 per the King County Growth Management Planning Council. Highlighted urban villages fall outside King County's countywide center designation criteria of 160–500 acres or below the minimum 18 existing AU or 30 future AU per acre. MIC designation criteria from PSRC does not include an AU density threshold.
Sources: City of Seattle, 2023; BERK, 2023.

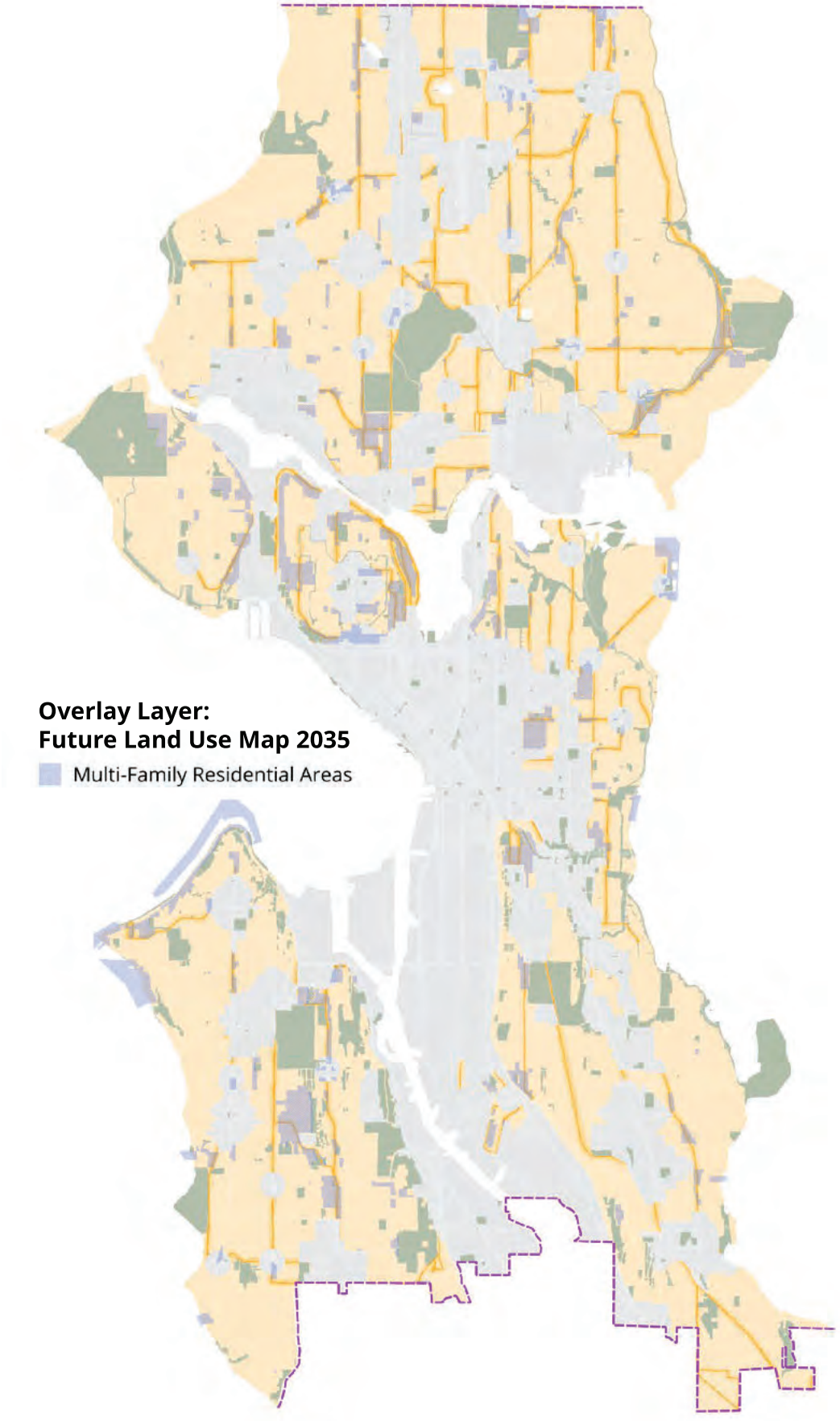
2021 King County Countywide Planning Policies

	Metro Growth Centers	Urban Growth Centers	Countywide Growth Centers
3. freight access	Yes	To be addressed in subarea plan	To be addressed in subarea plan
PART 3: CENTER CRITERIA			
A. Purpose			
1. Compatibility with VISION centers concept, Regional Growth Strategy and Multicounty Planning Policies	Yes	Yes	Yes
B. Activity level/Zoning [20]			
1. existing activity [21]	60 activity unit density	30 activity unit density (AUs refer to combined jobs and population)	18 activity unit density
2. planned activity	Above 120 activity unit density	60 activity unit density	30 activity unit density
3. sufficient zoned capacity	Yes. Should be higher than target and supports a compact, complete, and mature urban form.	Yes. Should be higher than target.	Should have capacity and be planning for additional growth
4. planning mix of housing types and employment types	Planning for at least 15% residential and 15% employment activity	Planning for at least 15% residential and 15% employment activity	Planning for at least 20% residential and 20% employment, unless unique circumstances make these percentages not possible to achieve.
C. Geographic Size			
1. minimum size	320 acres	200 acres	160
2. maximum size	640 acres (larger if internal HCT)	640 acres (larger if internal HCT)	500 acres
D. Transit			

20 PSRC's 2015 guidance on Transit Supportive Densities and Land Uses cites an optimal level of 56-116 activity units per acre to support light rail, dependent on transit costs per mile. The guidance indicates an optimal threshold of at least 17 activity units per acre to support bus rapid transit. Note: the existing threshold in the CPPs is roughly equivalent to 85 AUs existing activity for King County Urban Centers.

21 For existing centers, not meeting existing activity unit thresholds is not grounds for de-designation or re-designation by the Growth Management Planning Council.


Alternative 2
Focused
This map provides additional detail about location of potential neighborhood anchors being studied in the One Seattle Plan EIS.
1 North Delridge / Youngstown
Delridge Way SW & SW Dakota St
2 Interbay / Dravus
W Dravus St & 24th Ave W
3 NE 130th Street
NE 130th St & NE Roosevelt Way
4 Madison Park
E Madison St & 42nd Ave E
5 Magnolia
33rd Ave W & W McGraw St
6 Alki
SW Stevens St & 61st Ave SW
7 High Point
35th Ave SW & SW Morgan St
8 Wedgwood (85th)
35th Ave NE & NE 85th St
9 Wedgwood (75th)
35th Ave NE & NE 75th St
10 Madison Valley
E Madison St & 29th Ave E
11 Madrona
E Union St & 34th Ave
12 Brandon Junction
Delridge Way SW & SW Brandon St
13 Georgetown
12th Ave S & S Harney St
14 South Beacon Hill
Beacon Ave S & S Columbia Way
15 Bryant
NE 55th St & 40th Ave NE
16 Sylvan Junction
Delridge Way SW & SW Orchard St
17 Dawson / Seward Park
Wilson Ave S & S Dawson St
18 Loyal Heights
NW 77th & 24th Ave NW
19 Roanoke Park
10th Ave E & E Boston St
20 Ravenna
NE 65th St & 25th Ave NE
21 West Phinney Ridge
NW 65th St & 8th Ave NW
22 Pinehurst
NE 125th St & 15th Ave NE
23 Holman Road
Holman Rd NW & 3rd Ave NW
24 15th & 145th
15th Ave NE & NE 145th St
25 Rainier & Graham
Rainier Ave S & S Graham St
26 Upper Fremont
Fremont Ave N & N 43rd St
27 Squire Park
E Marion St & 18th Ave
28 Maple Leaf
Roosevelt Way NE & NE 90th St
29 Fauntleroy
35th Ave SW & SW Barton St
30 Lake City Way
Lake City Way and 15th Ave NE
32 North Green Lake
E Green Lake Dr N and Wallingford Ave N
33 Greenwood & 145th
Greenwood Ave N & N 145th St
34 Windermere
Sand Point Way NE & Princeton Ave NE
35 Sand Point Way
NE 45th St & 38th Ave NE
36 Gatewood
35th Ave SW & SW Holden St
37 Gas Works
Wallingford Ave N & N Northlake Way
38 Montlake
24th Ave E & E Calhoun St
39 North Magnolia
34th Ave W & W Emerson St
40 Tangletown
Keystone Pl N and N 56th St
41 Nickerson
Nickerson St and Warren Ave N
42 Highland Park
9th Ave SW and SW Trenton St
43 Broadview
Greenwood Ave N and NW 125th St
Bitter Lake
Lake City
Northgate
Aurora-Licton Springs
Crown Hill
Greenwood-Phinney Ridge
Green Lake
Roosevelt
Ballard
Wallingford
University District
Fremont
Eastlake
Uptown
South Lake Union
Madison-Miller
First Hill/Capitol Hill
Downtown
23rd & Union-Jackson
North Beacon Hill
Mt Baker
Greater Duwamish
West Seattle Junction
Columbia City
Othello
South Park
Westwood-Highland Park
Rainier Beach


Overlay Layer:
Future Land Use Map 2035
Multi-Family Residential Areas

Identifying Potentially Development-Threatened Tree Canopy in Environmental Justice Priority Areas

Draft April 8, 2024

Joshua Morris, Urban Conservation Manager at Birds Connect Seattle
Email: joshm@birdsconnectsea.org

INTRO

Environmental Justice priority areas in Seattle are census tracts with Racial and Social Equity Index scores that fall within the two highest quintiles.

These communities tend to have lower overall tree canopy cover than whiter and wealthier neighborhoods (2016 Seattle Tree Canopy Assessment) and have experienced higher rates of tree canopy loss in recent years (2021 Seattle Tree Canopy Assessment). Given the important role trees play in community and climate resilience and the benefits they provide to mental and physical health, working with EJ communities to preserve and enhance tree canopy should be a priority for the City.

At the same time, increased demand for housing is driving land use changes and infill development. Parcels on which development occur experience significant canopy loss, 40% on average according to the 2021 Seattle Tree Canopy Cover Assessment.

The City uses Zoned Development Capacity models to identify parcels where redevelopment could occur to increase housing density. These parcels have fewer housing units than would be allowed under their current zoning class. These parcels also often support a significant number of established trees. 19-1

In Lowrise, Midrise, Commercial, and Seattle Mixed Zones, development footprint may occupy 85-100% of the lot area, and tree removal in downtown and industrial zones is not regulated under the tree protection ordinance. Trees in these zones on revdevelopable lots, then, are potentially highly threatened by future development.

Understanding the distribution of development-threatened trees and planning to maximize their retention during development is important if the City is to meet its canopy equity goals.

METHODS

Analysis objective: Find tree canopy in Environmental Justice Priority Areas and on private property on underdeveloped parcels in Lowrise, Midrise, Commercial, and Seattle Mixed zones, where 85-100 lot coverage allowed under the new tree protection ordinance, or on Downtown and Industrial zones which are "silent zones" not regulated by the tree protection ordinance.

Datasets

Dataset	Source	Last Updated
Seattle_Tree_Canopy_2016_2021_RSE_Census_Tracts	https://data-seattlecitygis.opendata.arcgis.com/datasets/SeattleCityGIS::environmental-justice-priority-areas/about	Jan 26, 2024
Tree_Canopy_2021_Seattle	https://data-seattlecitygis.opendata.arcgis.com/datasets/SeattleCityGIS::seattle-tree-canopy-2021/about	Jan 26, 2024
Zoned Development Capacity by Development Site Current	https://data-seattlecitygis.opendata.arcgis.com/datasets/SeattleCityGIS::zoned-development-capacity-by-development-site-current/about	Jan 27, 2024
Unofficial neighborhood boundaries	https://www.arcgis.com/home/item.html?id=8adffd6b8fba4a84966fa7471afd0d6c	Nov 29, 2023

19-1 cont

Defining and mapping development-threatened tree canopy procedure:

1. Set definition query on Zoned Development Capacity Layer:
   PUB_OWN_TY = 'PRIVATE' And (REDEVSTATU = 'REDEV' Or REDEVSTATU = 'VACANT') And (CLASS = 'MR' Or CLASS = 'C' Or CLASS = 'L' Or CLASS = 'NC' Or CLASS = 'SM' Or CLASS = 'D' Or CLASS = 'I')"
   Intersect tree canopy, EJ priority areas, and zoned development capacity layers called "Development Threatened Tree Canopy 2021 in EJ Priority Areas"
2. Add new field to "Development Threatened Tree Canopy 2021 in EJ Priority Areas" called "DTTC_Acres" (double).
3. Calculate geometry of DTTC_Acres
   Property = Area (geodesic)
   Area Unit = Acres
   Coordinate system = default
4. Intersect Development Threatened Tree Canopy 2021 in EJ Priority Areas with Neighborhoods layer. Call it DTTC_Neighborhoods_Intersect
5. Add new field to "DTTC_Neighborhoods_Intersect" called "DTTC_Hood_Acres" (double).
6. Calculate geometry of DTTC_Hood_Acres
   Property = Area (geodesic)

Area Unit = Acres
Coordinate system = default

Estimating street tree canopy contribution to DTTC

1. Dissolve DTTC_Neighborhoods_Intersect on "gridcode" field (=1 for all records). Default settings (create multipart features). Output aggregates the many thousands of DTTC canopy polygons into a single, multipart feature. Call it DTTC_Dissolve
2. Create new point feature class using Create Random Points tool. Constrain the output to DTTC_Dissolve, create 500 points. Output is 500 random points distributed within the boundaries of DTTC_Dissolve. Call new feature class "Random_Point_Assessment"
3. Create new field in Random_Point_Assessment called "Street_Tree" (short, numeric).
4. Set basemap to satellite imagery.
5. Zoom to each random point to determine if the canopy it is associated with is from a tree planted in the public right of way or is rooted on private property. If street tree, assign value "1", else "0"
6. Where determination cannot be made from satellite imagery, use Google Street View.
7. Where determination is uncertain, assume street tree and assign value "1".

RESULTS

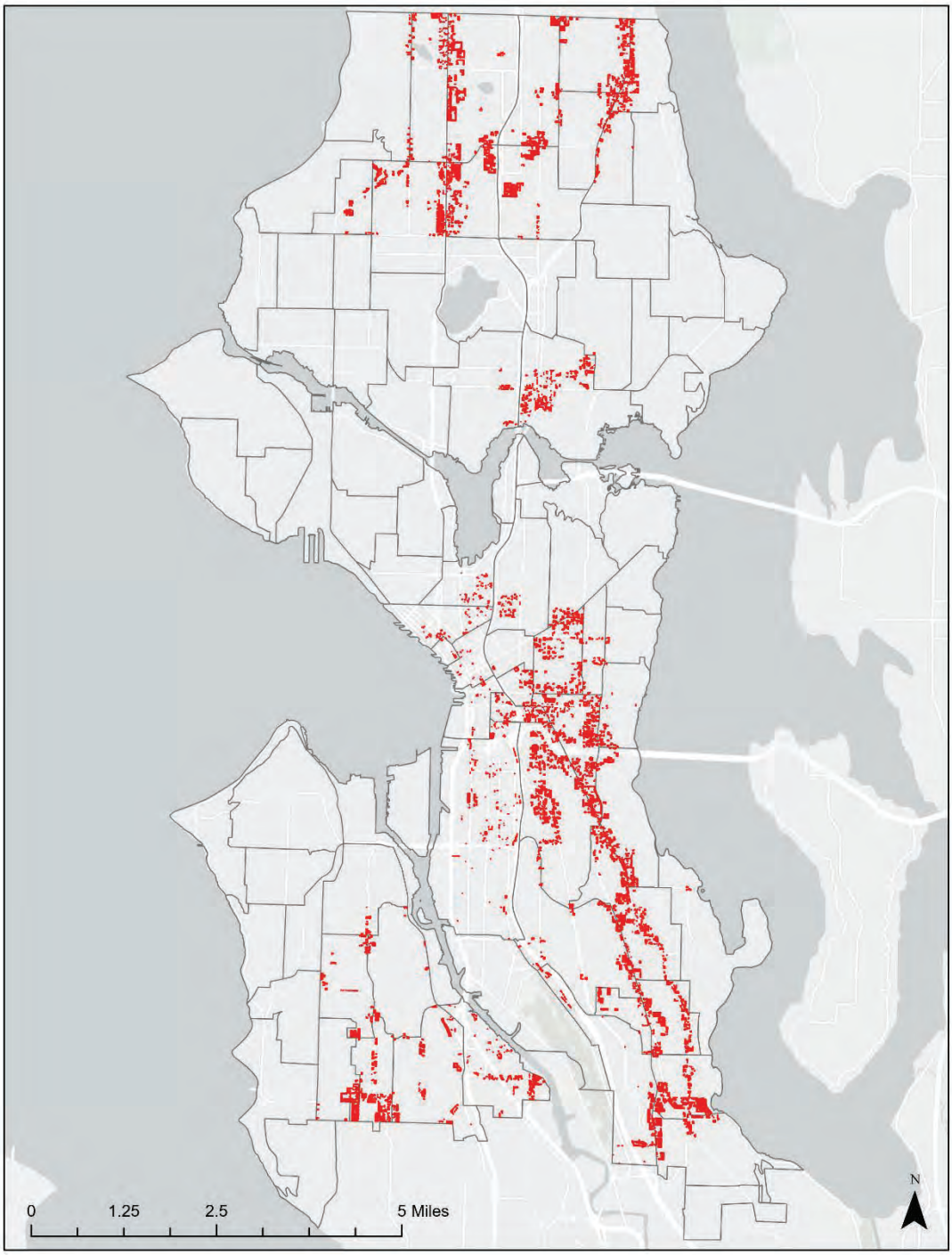
19-1 cont

There is a total of 226.7 acres of tree canopy overhanging redevelopable parcels in EJ priority areas. Some of this tree canopy is contributed by street tree canopy spreading from the right of way over private property. Street trees are governed by different regulations than trees on private property and are not the focus of this analysis.

Of a random assessment of 500 points within tree canopy on redevelopable parcels in EJ priority areas, 33 were determined to fall within tree canopy contributed by street trees. I estimate the mean canopy contribution from street trees to be 6.6% (95% Confidence Interval 4.4% to 8.8%).

Therefore, I estimate there are between 207 to 217 acres of development-threatened tree canopy on private property in Environmental Justice Priority Areas.

Map of distribution of development-threatened tree canopy in EJ Priority Areas (red) with unofficial neighborhood outlines.



19-1
cont

Results by neighborhood

Neighborhood	Acres of Development-threatened Tree Canopy in EJ Priority Areas		
	Mean Estimate	Lower 95% CI Estimate	Upper 95% CI Estimate
North Beacon Hill	15.60	15.24	15.97
Atlantic	13.92	13.59	14.25
Columbia City	13.86	13.53	14.18
Dunlap	13.79	13.46	14.11
Haller Lake	11.36	11.10	11.63
Rainier Beach	11.13	10.87	11.39
North College Park	9.00	8.79	9.21
South Delridge	8.80	8.59	9.01
Greenwood	7.79	7.60	7.97
Brighton	7.74	7.56	7.92
Minor	7.47	7.29	7.65
South Beacon Hill	7.42	7.24	7.59
Highland Park	7.23	7.06	7.40
Olympic Hills	6.44	6.28	6.59
Mid-Beacon Hill	6.18	6.03	6.32
Maple Leaf	5.91	5.77	6.05
Pinehurst	5.46	5.33	5.58
University District	5.41	5.28	5.54
Cedar Park	5.14	5.02	5.26
Mount Baker	4.97	4.85	5.08
High Point	4.20	4.10	4.30
South Park	3.65	3.56	3.73
Industrial District	3.06	2.99	3.13
Meadowbrook	2.88	2.81	2.94
Bitter Lake	2.69	2.63	2.75
Riverview	2.66	2.60	2.72
International District	2.40	2.35	2.46
Roxhill	2.06	2.01	2.11
Crown Hill	1.68	1.64	1.72
Yesler Terrace	1.53	1.49	1.56
Victory Heights	1.34	1.31	1.37
Leschi	1.29	1.26	1.32
Stevens	1.26	1.23	1.29
Broadway	0.94	0.92	0.96
Holly Park	0.91	0.89	0.93
Mann	0.83	0.81	0.84
Broadview	0.80	0.78	0.82

19-1 cont

Wallingford	0.73	0.71	0.75
South Lake Union	0.56	0.55	0.57
North Delridge	0.48	0.47	0.49
Belltown	0.41	0.40	0.42
Pioneer Square	0.22	0.21	0.22
Madrona	0.18	0.17	0.18
Seward Park	0.10	0.10	0.10
Central Business District	0.08	0.07	0.08
First Hill	0.06	0.05	0.06
Ravenna	0.05	0.05	0.05
Pike-Market	0.03	0.03	0.03
TOTAL	**211.65**	**206.66**	**216.63**

Results by zone class

Zone Class	Acres of Development Threatened Canopy in EJ Priority Areas		
	Mean Estimate	Lower 95% CI Estimate	Upper 95% Estimate
Lowrise	100.23	97.87	102.59
Neighborhood Commercial	47.33	46.21	48.44
Commercial	26.46	25.84	27.08
Industrial	14.04	13.71	14.37
Midrise	11.20	10.94	11.46
Seattle Mixed	8.78	8.58	8.99
Downtown	3.60	3.52	3.68
TOTAL	211.65	206.66	216.63

19-1 cont

From:	Josh Morris
To:	PCD_CompPlan_EIS; PCD_OneSeattleCompPlan
Cc:	Claire Catania; Christine Scheele; ConCom
Subject:	Birds Connect Seattle comments on draft One Seattle Plan and DEIS
Date:	Monday, May 6, 2024 4:45:43 PM
Attachments:	image003.png FINAL BCS Comments Draft 2024 Comprehensive Plan Update and DEIS.pdf

CAUTION: External Email

Dear Department of Planning and Community Development,

Please find Birds Connect Seattle's feedback and recommendations on the draft One Seattle Plan DEIS attached. **Comments on the DEIS begin on page 11.**

Please let me know if you have any questions or would be interested in discussing.

Sincerely,

Joshua Morris
Urban Conservation Manager
pronouns: he/him
desk: (206) 523-8243 ext. 113
joshm@birdsconnectsea.org

BIRDS CONNECT SEATTLE

8050 35th Ave NE Seattle, WA 98115 | birdsconnectsea.org
Birds Connect Seattle, formerly Seattle Audubon, advocates and organizes for cities where people and birds thrive. **Join us!**

Found a dead or injured bird? Submit a report at dbird.org.

20-1

BIRDS CONNECT SEATTLE

May 6, 2024

Office of Planning and Community Development
Seattle City Hall
600 4th Ave
Seattle, WA 98104
Submitted via email to OneSeattleCompPlan@seattle.gov & PCD_CompPlan_EIS@seattle.gov

RE: Birds Connect Seattle comments on One Seattle Plan (Comprehensive Plan Update) draft for public review

Dear Office of Planning and Community Development,

Hello from Birds Connect Seattle, Seattle's local bird conservation organization since 1916. We envision cities that value and integrate nature, protect habitat, and minimize hazards to birds. The draft One Seattle Plan is an exciting, once-in-a-decade opportunity for Seattle to evaluate and improve its progress toward a just city where people and birds can thrive.

High-level summary of our comments on the draft One Seattle Plan:

We appreciate and recommend maintaining these sections, goals, and policies specifically:

- Integration of climate mitigation, adaptation, and resilience throughout the plan;
- Incorporation of landscaping techniques to improve environmental health (e.g., LU 2.6)
- Planning for green jobs and a sustainable economy (e.g., ED G7)
- Greater integration of tree canopy policies throughout the plan (e.g., LU 2.7, LU 4.8,
- Addition of nature-based solutions and ecological restoration as important tools for addressing climate impacts and environmental hazards (e.g., CE 10.3, CE 10.4, CE 11.2, CE 11.4);
- Addition of goals and policies for Tribal consultation and supporting Indigenous communities. (e.g., CI G4 and related policies; CE 13.7, CE 14.3, P 4.6)
- Consideration for wildlife and nature appreciation in parks and recreation planning (e.g., PG3, P 1.13, P 2.4)

20-1

We recommend strengthening the draft One Seattle Plan by:

- Acknowledging the global extinction crisis and establishing equitable biodiversity conservation as a goal;
- Integrating and increasing ambition and specificity of goals and policies related to biodiversity conservation throughout the plan; and
- Expanding conception and expectations of sustainable operations and building design to include wildlife safety.

Please see our specific feedback and recommendations on the following pages. **Note: DEIS comments begin on page 11.**

Our specific observations, feedback, and recommendations on the draft One Seattle Plan are:

OBSERVATION 1. The draft One Seattle Plan does not acknowledge that we are in the midst of a global extinction crisis on the same scale as climate change. Both crises pose existential threats to human futures and must be urgently addressed together. Goals and policies for holistic stewardship of Seattle's urban biodiversity are entirely absent from the draft Comprehensive Plan. 20-2

While the draft update reflects the City's evolving and improving understanding and responsibility for managing for and mitigating impacts of climate change, it does not reflect a similar understanding of the City's role in addressing biodiversity loss.

RECOMMENDATION 1: Revise the "Climate and Sustainability" element to become the "Climate, Biodiversity, and Sustainability" element.

We recommend elevating and integrating biodiversity conservation in the same way climate change has been elevated and integrated. We recommend adding "Biodiversity" in the element title and adding a new "Equitable Biodiversity Conservation" section, with discussion, goal, and policies. We submit the following draft language for your consideration:

EQUITABLE BIODIVERSITY CONSERVATION

DISCUSSION

Seattle's biodiversity provides services and benefits to people.
We love living and working in Seattle. The landscape is beautiful. The culture is vibrant. And the diversity of life we can experience every day is wild. Orca off Alki, Bald Eagles over Ballard, Long-toed Salamanders at Camp Long, our neighborhoods and waterways are peopled with more than people: at least 3,000 species of plants, fungi, birds, and other wildlife have been documented to-date within Seattle's municipal boundaries (iNaturalist Community, 2024).

The plants, fungi, and animals we share our neighborhoods with make up our urban biodiversity. This biodiversity underpins the function of our urban ecosystem and provides foundational services to the people who live in and visit Seattle—including food production, air purification, pest control, reduced need for cooling and heating, opportunities for recreation, and more. Nature also promotes human health and wellbeing (see Hartig et al., 2014 for a review).

For many of us in Seattle, our daily contact with nature occurs right in our neighborhoods. The degree to which the nature of our neighborhoods can provide us with physical and psychological benefits depends on many attributes, including location, tree canopy, general quality, and amenities like bathrooms and benches (Konijnendijk et al., 2013). Experiences in environments with higher levels of biodiversity also play a role in reducing stress and promoting feelings of restoration and wellbeing (Fuller et al., 2007; Wood et al., 2018, Schebella et al., 2019, Houlden, Jani & Hong, 2021, Hammoud et al. 2024).

The benefits of Seattle's biodiversity are not equitably distributed and may be declining.
The benefits of nature, biodiversity, and ecosystem services are not equitably distributed across Seattle. Generally, more affluent neighborhoods and those with predominantly white residents have greater vegetation cover, tree canopy cover, and biodiversity (Schell et al., 2020). This did

not happen by accident. Redlining and other racist policies determined not only where people can live, work, and play, but also how vegetation is planted and maintained. This, in turn, affects the distribution and movement of other living things in the city. We have the opportunity and responsibility to address these inequities.

Like all ecosystems, cities change. In the last decade, we experienced the greatest average annual population growth since the Klondike Gold Rush. We've set new weather records for high temperatures, days without precipitation, and smoke storms. Our urban biodiversity is changing, too. Some species, like Yellow-faced Bumblebees are becoming more common. But populations of many others are in decline, including 52 percent of bird species that regularly occur in King County (Rosenburg et al., 2019, supplemental data). The capacity of Seattle's natural systems to support a wide diversity of life may be deteriorating.

20-2 cont

We urgently need an integrated policy to halt both climate change and biodiversity loss. Climate change and biodiversity loss are the two most urgent environmental challenges of our times (Pörtner et al., 2021).

Biodiversity loss, which has potential consequences for humanity that rival climate change (Cardinale et al., 2012), yet has received much less attention by the City of Seattle. We have no citywide strategy for managing biodiversity. We have no city ordinances or resolutions with "biodiversity loss" in the title. Our Climate Action Strategy does not reference biodiversity or wildlife. And while the current version of the Comprehensive Plan (November 2020) contains goals and policies for protecting and restoring the natural environment, biodiversity is not defined or used as a concept.

The scientific community is calling for decision makers to integrate climate change and biodiversity on policy agendas (Roberts, O'Leary & Hawkins, 2020; Pettorelli et al., 2021; Pörtner et al., 2021). With "environmental stewardship" as a core value of the 2024 Comprehensive Plan update, the City of Seattle intends to begin building an integrative policy framework for addressing both climate change and biodiversity loss.

GOAL

Seattle's biodiversity is valued, conserved, restored, and wisely used, maintaining ecosystem services, sustaining healthy ecosystems, and delivering benefits essential for all people. (Adapted from Secretariat of the Convention on Biological Diversity, 2020)

POLICIES

1. Recognize, fund, and support Indigenous-led environmental conservation and nature stewardship.
2. Fund and support learning-focused urban experiments with Indigenous communities for climate action, nature stewardship, and appreciation.
3. Integrate biodiversity values into planning processes and reporting systems.
4. Aggressively seek new financing mechanisms for conservation, natural space management, urban forestry, etc.
5. Ensure equity in actions to address climate change, biodiversity loss, and the use of benefits of biodiversity, including:

- Accounting for the needs of children, youth, and future generations.
- Sharing the benefits and burdens of biodiversity in a way that is equitable, transparent, and accountable.
- Collaborating with communities to co-create and implement plans for climate action and biodiversity conservation that are in accessible languages, provide for public participation, and that prioritize removing the barriers faced by Black, Indigenous, and People of Color, children, people with disabilities, and other systemically under-resourced people.

20-2 cont

6. Protect, maintain, and enhance biodiversity in natural areas, parks, and open spaces.
7. Explicitly plan for open spaces and natural habitats during new development.
8. Use a variety of arrangements of built and open space to meet a diversity of ecological requirements.
9. Encourage enhancement of habitat quality within the entire matrix of urban land uses, including private property.
10. Reduce urban hazards to biodiversity, including pesticides, reflective glass, plastic pollution, and from harmful impacts of human-associated species like free-ranging, outdoor cats.
11. Embrace the novelty of urban habitats and species composition to create ecosystems that meet the needs of people, biodiversity, and are adaptive to climate change.
12. Celebrate urban biodiversity to foster connections between people and the natural heritage of their local ecosystems.
13. Determine the status and trends of biodiversity within Seattle's jurisdiction, including:
    - Documenting the richness and distribution of currently existing biodiversity.
    - Identifying rare or limited habitat types, such as native prairies, oak woodlands, bogs and other wetlands, intertidal and marine habitats, etc.
    - Identifying existing and potential habitat corridors that facilitate safe movement of organisms between natural areas, parks, open spaces, and other habitat areas.
    - Selecting established indicators of urban biodiversity, such as the City Biodiversity Index.
    - Monitoring and evaluating changes in Seattle's biodiversity indicators over time.
13. Confront and address human-nature conflict in cities, including:
    - Examining both the services and disservices of biodiversity to understand how, when, where, and why urban biodiversity can be viewed as unpleasant, dangerous, or destructive.
    - Cataloging effective solutions to conflicts.
    - Planning, designing, and communicating to address conflicts or reduce fears.
14. Create resilient landscapes by:
    - Considering the needs of biodiversity early in urban planning and development projects, rather than as "add-ons" if space or budget allow.
    - Monitoring and managing climate related impacts on biodiversity, including new pests and pathogens.
    - Testing and evaluating new designs of nature-based solutions across urban typologies, together with their financing models and policy mechanisms.
15. Reconnect people with biodiversity in cities through community science and engagement programs.

16. Evaluate government-provided incentives and eliminate or reform those that are harmful to biodiversity.
17. Reform industrial, economic, and business practices to reduce negative impacts on biodiversity.
18. Encourage all people to take measurable steps toward just and sustainable consumption levels and lifestyles, taking into account individual, cultural, and socioeconomic conditions.

20-2 cont

[the above adapted from United Nations Environment Programme, 2021; Secretariat of the Convention on Biological Diversity, 2020; Marzluff & Rodewald, 2008; and Oke et al., 2021]

OBSERVATION 2: Goals and policies for tree canopy, shorelines, environmentally critical areas, and other important urban habitat features are weak and lack solid foundation on which to evaluate progress or success.

RECOMMENDATION 2: Increase ambition and specificity of goals and policies related to urban biodiversity. Specific recommendations follow.

LAND USE ELEMENT

Urban Design

20-3

- **We recommend LU 2.1 be revised to read:** "Encourage the protection, restoration, and celebration of Seattle's natural features and landforms such as bluffs, beaches, streams, and forests and trees."

Multifamily Zones

Development on multifamily zones takes a heavy toll on the trees that grow there. The 2021 Tree Canopy Assessment found that on average 50% of tree canopy was lost on multifamily lots that had undergone development. Multifamily zones also already tend to have less canopy cover and many of these zones are in Environmental Justice Priority Areas where tree canopy loss has been experienced disproportionately. The updated version of SMC 25.11 passed in 2023 allows developers to hardscape up to 85% of the developable lot area in multifamily zone, leaving little room for trees. Planning for tree preservation and planting in these zones is critical for meeting the city's climate resilience and environmental equity goals.

- **We recommend revising policy LU 10.4 (p 48) to read:** "Design multifamily zones to be appealing residential communities with high-quality housing and development standards that promote livability and a sense of community, including equitable tree canopy, appropriately scaled landscaping, street amenities, and, in appropriate locations, limited commercial uses that serve the neighborhood's residents."

Historic Preservation and Cultural Resources

The wild things we share our city with are links to Seattle's past and important cultural resources. Yet the Historic Preservation and Cultural Resources section does not specifically identify natural heritage as a subject of preservation.

- **We recommend revising the first sentence of the discussion on page 58 to read:** "Historic preservation recognizes and protects aspects of our shared cultural heritage—buildings, districts, designed landscapes, natural features, and areas long used by Indigenous communities—that link to Seattle's past."
- **Add a policy under Goal LU G16 (p. 59) to read**: "Support the preservation and celebration of natural landscapes, features, and species, that contribute to Seattle's unique sense of place and connect us to its past."

20-3 cont

Environmentally Critical Areas

Regulations for environmentally critical areas should not just seek to protect ecological functions and values of wetlands and fish and wildlife conservation areas, they should also seek to *enhance* them. Our regulations should also protect the health and safety of both people and wildlife.

- **We recommend that LU G17 (pp. 60-61) be revised to read:**

  "Environmentally critical areas regulations seek to:

  - protect and enhance the ecological functions and values of wetlands and fish and wildlife conservation areas;
  - prevent erosion on steep slopes;
  - protect public health, safety, and welfare in areas subject to landslides, liquefaction, floods, or peat settlement;
  - inform the public by identifying seismic and volcanic hazard areas; and
  - minimize harm to people, wildlife, property, public resources, or the environment"
- **We recommend adding a new policy under the Fish and Wildlife Conservation Areas section (p 62) to read:** "Seek to increase both the number and area of fish and wildlife conservation areas."

TRANSPORTATION ELEMENT

Streets Designed for Everyone

Changing how we design and use the public right of way is an exciting opportunity to achieve multiple benefits—increased tree canopy, greater urban food production, improved access between parks for people, and increased wildlife supporting capacity in the city to name a few. Birds Connect Seattle and partners at the Capitol Hill EcoDistrict have been developing this concept for years through the Nature of Your Neighborhood Project (see natureofyourneighborhood.org).

20-4

- **We recommend adding a new policy under goal TG 2 (p. 68) to read:** "Identify streets and other public rights-of-way that could potentially serve as corridors between parks and open spaces to prioritize vegetation and amenity enhancements to improve people's access to public space and to facilitate movement of wildlife."
- **We recommend revising policy T 2.17 (p. 69) to read:** "Create vibrant public spaces in and near the right-of-way that foster social interaction, promote access to walking,

bicycling, and transit options, support birds and other wildlife, and enhance the public realm.

ECONOMIC DEVELOPMENT ELEMENT

Build and Invest in the Green Economy

We support living-wage green jobs and a just transition to a decarbonized economy.

- **We recommend revising policy ED 7.1 (p. 136) to read:** "Establish partnerships to build workforce capacity to advance completion of city-wide decarbonization and climate adaptation efforts, including through electrification, construction, conservation, urban forestry, and other new green technology programs."
- **We recommend revising policy ED 7.**3 (p. 136) to read: "Support business partnerships and models which are centered on climate mitigation, climate adaptation, biodiversity conservation, and/or a shift toward sustainable operational models within established industries, including incubator and accelerator funding of new sustainable businesses."

20-4 cont

CLIMATE AND ENVIRONMENT: HEALTHY RESILIENT COMMUNITIES AND ENVIRONMENT ELEMENT

Tree Canopy

Trees are among the most important natural features in urban areas. But the urban forest is more than a tree canopy: it is a layered system including soil, understory plants, and the epiphytes that live on the trees themselves. Seattle's urban forest is amazingly diverse (Jacobson 2006) and in decline (Seattle Office of Sustainability and Environment 2023). Additional investment and attention will be needed to reverse losses and address inequities.

- **We recommend revising the title of this section (p. 149) to read:** "Urban Forest and Tree Canopy".
- CE G12 (p. 150) establishes a goal for tree canopy cover, but its ambition and specificity were reduced from that in our current plan. Why? We also question if determining the maximization of benefits of the urban forest is possible. **We therefore recommend revising CE G12 to read:** "Seattle has a healthy urban forest with a tree canopy that covers at least 30% of the land by 2037, and 40% over time, which meets the needs of people and wildlife. ((~~maximizes the environmental, economic, social, and climate-related benefits of trees.~~))"
- **We recommend revising policy CE 12.1 (p. 150) to read:** "Consider and prioritize the needs of frontline communities in all urban forestry actions."
- **We recommend revising policy CE 12.5 (p. 150) to read**: "Reach out to, educate, and partner with the community to help care for, preserve, and celebrate Seattle's urban forest. ((~~and preserve our tree canopy.~~))"
- Care and maintenance for most street trees is the responsibility of the adjacent property owner. Tree care can be expensive, which creates disincentives for tree planting and preservation. This has contributed to the current inequity in tree canopy cover we observe across the city. **We therefore recommend adding a new policy under CE G12 (p. 150) to read**: "Explore opportunities through subsidies or other

mechanisms to reduce inequities and disincentives associated with the cost of tree care."

- We need measurable goals to ensure we are delivering on canopy and nature access equity goals. We ask you to consider the 3-30-300 rule (Browning et al. 2023). **We recommend adding a new policy under CE G12 (p. 150) to read:** "Strive to equitably distribute the benefits of trees by advancing measurable policies such as the 3-30-300 rule: three (3) significant trees (at least 20' wide crown) from their dwelling, have 30% tree canopy in their neighborhood, and live within 300 meters (3-4 blocks) of a high-quality green space."

20-4 cont

PARKS AND OPEN SPACE ELEMENT

Seattle's parks, open spaces, and natural areas are the city's largest reservoirs of urban biodiversity, supporting thousands of species. Our urban biodiversity provides foundational services to people who live, work, and play in Seattle, and consideration for the needs of the biodiversity in our parks and open space must be considered as we plan for expanding public access to open space.

- **We recommend strengthening the final sentence to the first paragraph of the Parks and Open Space Introduction (p. 154)**: "Open spaces also support an amazing diversity of life—thousands of species of plants and animals have been documented in Seattle's natural areas. Our incredible urban biodiversity provides foundational ecosystem and cultural services that help make Seattle a great place to live. ((~~provide valuable wildlife and vegetation habitat that might otherwise be scarce in the city.~~))"

Access to Public Space

Sea-level rise threatens Seattle's beaches and other coastal habitats, especially since most of our shoreline is armored, which prevents habitats from transgressing inland in response to rising seas.

- **We recommend revising policy P1.14 (p. 157) to read:** "Provide sustainable public access to shorelines by improving shoreline street ends, applying shoreline regulations, ((~~and~~)) acquiring waterfront land, removing shoreline armoring, and restoring coastal habitat."
- Human presence and non-consumptive recreation in natural areas can negatively impact wildlife (see Dertien et al. 2021 for a review). **We recommend revising policy P 1.12 (p. 157) to read:** "Provide areas to preserve or restore important natural or ecological features and only allow people to access these spaces by building or expanding trail systems through greenbelts and other natural areas if it will not diminish habitat quality or negatively impact wildlife."
- Has the City of Seattle entered into agreement with local Tribes and Indigenous communities regarding the use of Indigenous ecological knowledge? If not, it may be inappropriate to attempt to integrate Indigenous ecological knowledge in open space design and interpretive elements. **We therefore recommend revising policy P 1.29 (p. 158) to read:** "Recognize and support Tribal leadership in conservation, restoration, and design of open space, plant selection, and interpretive elements.

((~~Incorporate Indigenous ecological knowledge and culture in open space design, plant selection, and interpretive elements.~~))"

Recreation, Activation, and Programming

As an organization that organizes outdoor recreation and wildlife watching, we support responsible and respectful recreation, activation, and programming in Seattle's green and open spaces. Our green spaces are home to thousands of species of plants, animals, and fungi, we need to be respectful of their needs as well. We would advise against promoting activities that could degrade habitat quality, especially near our limited natural area spaces.

20-4 cont

- We recommend adding a new policy under Goal P G2 to read: "Consider the needs of biodiversity in Seattle's parks and open spaces while developing recreation, activation, and programming, so that impacts may be minimized."

Climate Resilient Open Space

Our public open spaces will serve a key role in our city's climate adaptation. Their relatively high tree canopy cover will reduce heat island impacts, manage stormwater, and improve air quality. They will serve as social spaces to build community cohesion. And they will provide respite and refuge from urban stressors. Our parks and green spaces may also serve as refugia for wildlife species in ways that we may not foresee (McDonnell 2013). Creating climate resilient open spaces is indeed an important goal.

- As Goal P G5 is written, it is unclear to us what is meant by "healthy environment", why only shorelines are to be resilient, and how public spaces are meant to do the big job of mitigating the impacts of climate change. **We therefore recommend revising Goal P G5 to read:** "Public spaces meet community needs, maintain ecosystem functions and support healthy levels of biodiversity, and are resilient to and help ((~~support a healthy environment and resilient shorelines and~~)) mitigate the impacts of climate change."
- **We recommend adding a new policy to under Goal P G5 (p. 162) to read**: "Promote removal of shoreline armoring, coastal restoration, and managed retreat of structures away from areas at high risk of erosion, flooding or submersion due to sea-level rise."
- **We recommend adding a new policy under Goal P G5 to read:** "Assess vulnerability of Seattle parks—including park access, facilities, habitats, and wildlife—to climate change and develop proactive plans to manage for resilience."

Observation 3: Sustainable Design and Construction discussions do not reflect current understanding of the hazards to wildlife posed by built environment. Buildings that maximize use of natural light often incorporate large areas of reflective or transparent glass, which can have the unintended consequence of increasing risk of bird-window collisions unless the surface of the glass has been treated to be visible to birds. Birds Connect Seattle estimates that at least 40,000

wild birds die each year in Seattle due to bird window collisions (Birds Connect Seattle, 2024). Artificial light at night is also a serious environmental and public health concern.

RECOMMENDATION 3: Expand conception and expectations of sustainable buildings and City operations to include wildlife safety.

LAND USE ELEMENT

Urban Design

- **We recommend revising LU 2.3 (p. 37) to read: "**Encourage design that recognizes natural systems, ((~~and~~)) integrates ecological functions such as stormwater filtration or retention, increases the wildlife supporting capacity of our city by improving habitat resources, and that reduces hazards to wildlife from the built environment."
- **We recommend revising LU 2.14 (p. 38) to read: "**Consider the value of designing buildings and public spaces that maximize use of natural light and provide protection from inclement weather while also considering how to mitigate potential hazards to wildlife from such designs."

20-5

General Development Standards

- **We recommend revising Goal LU G4 (p. 40) to read:** "Development standards effectively guide building design to serve each zone's function; produce the scale and building forms desired; protect public health, safety, and welfare; minimize hazards to wildlife and the environment; and address the need for new housing and commercial space.
- **We recommend revising policy LU 4.18 (p. 42) to read:** "Seek excellence in new development through a design review process that encourages multiple perspectives on design issues and that complements development regulations, allowing for flexibility in the application of development standards to achieve quality design that:
    - enhances the design quality of the city;
    - responds to the surrounding neighborhood context, including historic resources;
    - enhances and protects wildlife and the natural environment;
    - allows for variety and creativity in building design and site planning;
    - furthers community design objectives;
    - achieves desired intensities of development; and
    - responds to the increasingly diverse social and cultural character of the city."

Telecommunication Facilities

Collisions with telecommunication towers kill millions of wild birds each year in the US (Loss et al. 2015). The risk can be substantially reduced by swapping steady-burning lights on towers for flashing lights (Gehring 2009).

- We recommend adding a new policy under goal LU G7 (p. 45) to read: "Require communication utilities to be developed and operated in ways that minimize hazards to wildlife and limit impacts on the environment."

Capital Facilities

- **We recommend including "wildlife safety" in goal CF G2 (p. 111) so that it reads:** "Capital facility projects are designed to achieve resiliency, sustainability, wildlife safety, high levels of environmental performance, zero carbon pollution, and minimal environmental impacts consistent with principles of environmental justice."
- **We recommend adding a new policy under goal CF G2 to read:** "Support City of Seattle biodiversity stewardship goals by employing design and operational strategies that reduce the risk of bird-window collisions."

Public School Facilities

Educational buildings often have many design characteristics that increase the risk of bird-window collisions, such as large surface area of reflective / transparent glass, and proximity to quality habitat. We encourage the city to consider how it can reduce this risk at public schools.

- We recommend revising policy CF 6.8 (p. 118) to read: "Encourage SPS to preserve and improve open space and to reduce hazards to wildlife when redeveloping school sites."

20-5 cont

PARKS AND OPEN SPACE ELEMENT

Operations and Maintenance

We appreciate Goal P G3 (p. 160) and would like to see it maintained in the final draft. However, we notice that hazards to wildlife from public space operations are not considered.

- **We recommend adding a new policy under P G3 to read:** "Evaluate and adjust open space operations and management practices to reduce hazards to wildlife."

Birds Connect Seattle submits the following critiques and recommendations on the draft Environmental Impact Statement:

CRITIQUE 1

On page 3.3-2, the DEIS establishes the following threshold of significance for plants and animals:

- Impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild, compared to the No Action alternative;

This threshold of significance is vague, not ecologically meaningful, and not set at appropriate scale to reasonably evaluate impacts.

RECOMMENDATION, RATIONALE, & SUPPORTING EVIDENCE 1

We recommend establishing the threshold of significance for plants and animals as

- **Impacts that would reduce the likelihood that locally occurring populations of native or naturalized species would persist compared to the No Action alternative.**

20-6

The impacts of Seattle's growth strategy will be most acutely experienced by the plant and animal communities within Seattle's boundaries. A regional or global unit of analysis, as proposed in the

DEIS, is inappropriately large and does not serve as a meaningful threshold of significance against which to evaluate alternative growth strategies.

At such a scale, impacts on many, but not all, of our plants and animals may indeed appear negligible. (There are more rare, sensitive, and imperiled species within city boundaries than described in the DEIS; see later section.) However, it is likely, as has occurred many times in Seattle's history already, that species that currently maintain natural populations in Seattle will be locally extirpated without consideration and mitigation for the impacts of the city's growth.

For example, the Northwestern Pond Turtle's historic range extended from California into British Columbia. They are now rare or absent around the entire Puget Sound region, there have been no observations in Seattle for decades (Washington Herp Atlas 2009; iNaturalist Community 2024). Similar stories could be told for dozens of other organisms.

There are several species still present but on the cusp of local extirpation in Seattle. For example, Western Screech-owls, once relatively common year-round residents in Seattle, are almost gone (Figure 1). Marbled Murrelets still visit Elliott Bay and other marine habitats off the coast of Seattle, but their numbers have dropped so precipitously (Figure 2) over the last few decades they are now Endangered in the State of Washington.

20-6 cont

Figure 1: Number of Western Screech-owls counted each winter in Seattle, Washington, as part of the National Audubon Society's Christmas Bird Count. Counts are standardized by observer effort, which varies annually, by dividing the total number of birds counted by total observation time (party hours). Christmas Bird County observations of Western Screech-owls have been declining since the 1980s. A simple linear model of Birds/party hour around scaled year is statistically significant ($p < 0.001$) with a regression coefficient of -0.016.

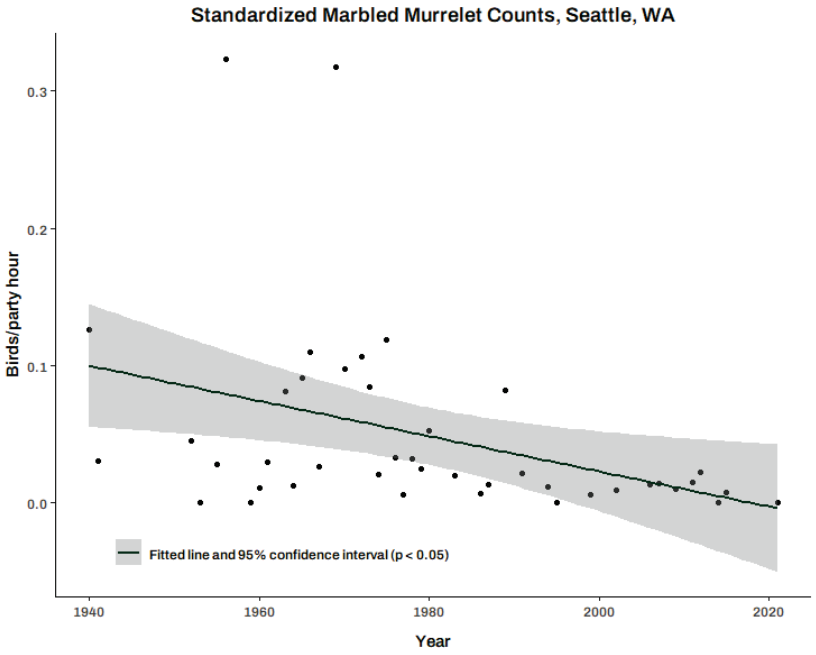


Figure 2: Number of Marbled Murrelets counted each winter in Seattle, Washington, as part of the National Audubon Society's Christmas Bird Count. Counts are standardized by observer effort, which varies annually, by dividing the total number of birds counted by total observation time (party hours). Christmas Bird Count observations of Marbled Murrelets have been declining for decades. A simple linear model of Birds/party hour around scaled year is statistically significant (p = 0.01) with a regression coefficient of -0.027.

20-6 cont

Many more species that occur in Seattle have populations in overall population decline. **We recommend the final DEIS incorporate analyses of impacts to species in decline. Supplemental data from Rosenburg et al. 2019 may be useful for estimates of North American bird species population trends.**

Urban biodiversity provides foundational services and benefits to people, so potential significant losses of local populations—those occurring within city boundaries—must be evaluated and mitigated. The final EIS analysis should include the consideration of developing and adopting a biodiversity conservation strategy as a form of mitigation as some other cities already have done (see Toronto City Planning and Parks 2019).

This improved threshold of significance and expanded scope of analysis would allow a more meaningful examination of urbanization's impacts within city limits and species and habitats that are still considered common but whose global or local populations are in decline.

CRITIQUE 2

On page 3.3-3, the DEIS states, "The plant and animal species found in Seattle are widespread in the region; some are globally abundant. Areas in the city limits represent a very small proportion of the total amount of habitat for any given species. The only ESA-listed or state-listed species are fish (steelhead and Chinook salmon).

This broad generalization is not factual. It fails to acknowledge two additional listed species (Southern Resident Orca and Marbled Murrelet) that use the waters adjacent to Seattle and over which it has jurisdiction and one candidate species for listing (Sunflower Sea Star). The

statement also fails to consider the range of rare, sensitive, and imperiled species and habitat types that occur in Seattle and its adjacent waters and how species populations are trending.

RECOMMENDATION, RATIONALE & SUPPORTING EVIDENCE 2

We recommend updating the DEIS discussion and analyses to reflect true occurrence information about rare, sensitive, and imperiled species and habitat types.

Common Name	Federal Conservation Status	Washington State Conservation Status	Occurs in Seattle
Southern Resident Orca	Endangered		Yes
Marbled Murrelet	Threatened		Yes
Sunflower Sea Star	Candidate		Yes
Oregon White Oak Woodland		Critically Imperiled	Yes
Old-growth Lowland Conifer Forest		Imperiled	Yes

20-6 cont

RCW 35.21.160 establishes Seattle's jurisdiction over its adjacent waters:

> **Jurisdiction over adjacent waters.**
>
> The powers and jurisdiction of all incorporated cities and towns of the state having their boundaries or any part thereof adjacent to or fronting on any bay or bays, lake or lakes, sound or sounds, river or rivers, or other navigable waters are hereby extended into and over such waters and over any tidelands intervening between any such boundary and any such waters to the middle of such bays, sounds, lakes, rivers, or other waters in every manner and for every purpose that such powers and jurisdiction could be exercised if the waters were within the city or town limits. In calculating the area of any town for the purpose of determining compliance with the limitation on the area of a town prescribed by RCW **35.21.010**, the area over which jurisdiction is conferred by this section shall not be included.

Given the jurisdiction of adjacent waters established by RCW 35.21.160, Seattle is responsible for analyzing impacts of its growth on adjacent marine and aquatic species and habitats in Puget Sound and Lake Washington.

The Southern Resident Orca population is federally protected as Endangered under the Endangered Species Act. The municipal waters of Puget Sound to the west of Seattle are a hotspot for the endangered Southern Resident Orca (Olson et al. 2018, Figure 3). The DEIS should include analysis of impacts on this protected population.

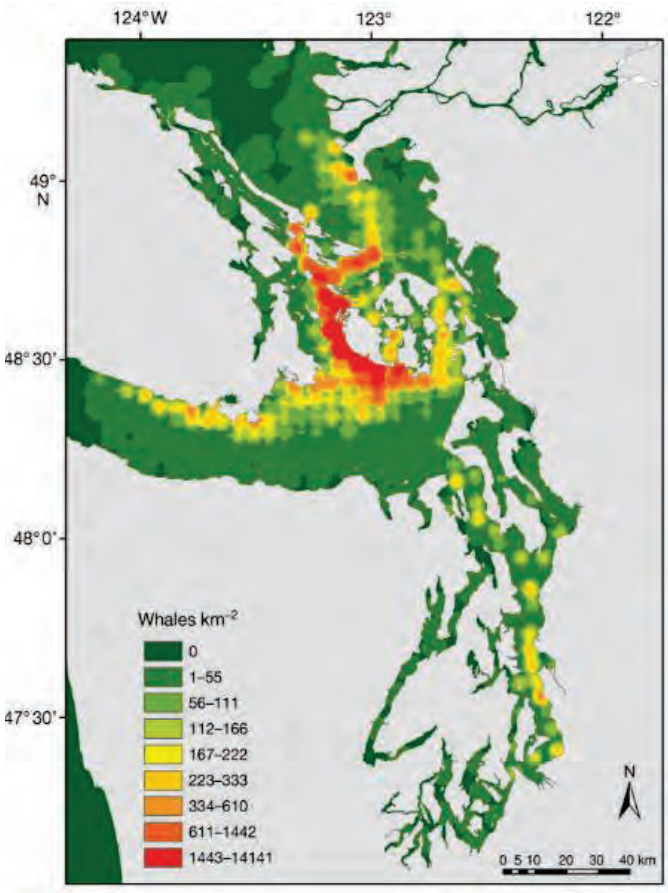


Figure 3: Southern Resident Orca density (number of whales km^{-2}) based on effort-corrected data in the Salish Sea from 1976-2014. Note that waters adjacent to Seattle are a hotspot of Orca sightings. Map from Olson et al. 2018.

Marbled Murrelets (*Brachyramphus marmoratus*) are federally protected as a Threatened species under the Endangered Species Act and state protected as an Endangered Species under the Washington State Endangered Species Act. They occur in Elliott Bay and elsewhere in Puget Sound adjacent to Seattle. As of May 5, 2024, there were at least five locations along the Seattle coast from which Marbled Murrelets had been observed in the last thirty days (eBird 2024, Figure 4). The DEIS does not mention their occurrence in Seattle's waters. The final EIS should include analysis of impacts on this protected species.

20-6 cont

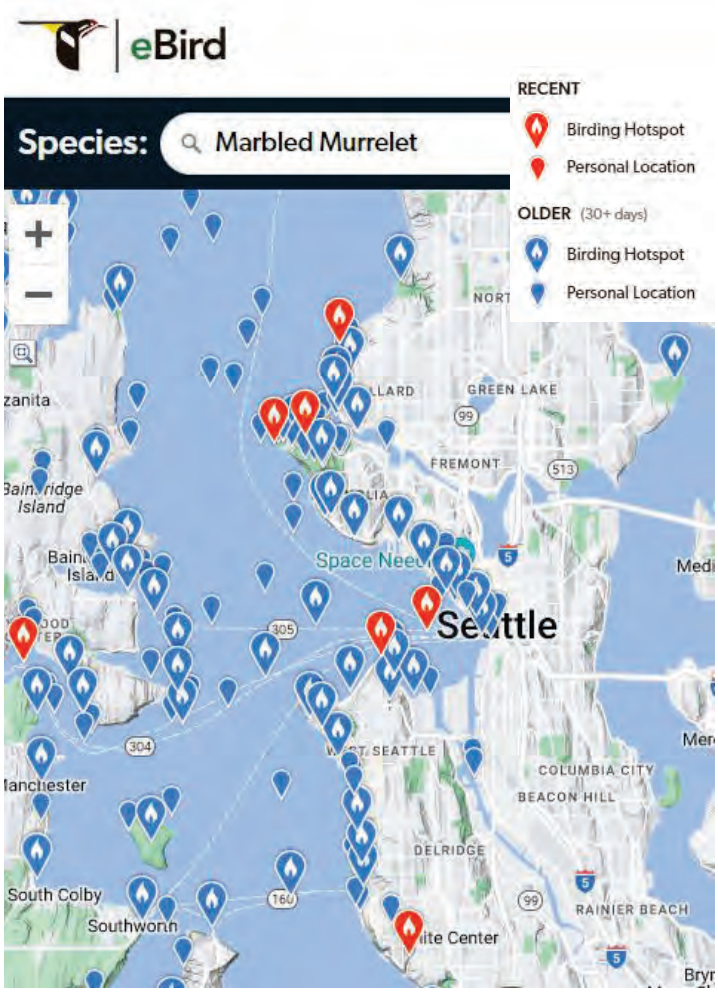


Figure 4: Birding hotspot locations around Seattle from which Marbled Murrelets have been observed. Those in red have observed Marbled Murrelet in the previous 30 days as of May 4, 2024. Visualization from eBird.org.

20-6 cont

The Sunflower Sea Star (*Pycnopodia helianthoides*) occurs in Puget Sound, with dozens of observations in intertidal areas around Seattle (Figure 5). Its population was devastated by sea star wasting syndrome. The National Atmospheric and Oceanic Administration proposed the species for protection as a Threatened species under the Endangered Species Act in 2023 (NOAA 2023). The DEIS does not mention this candidate species. This should be addressed in the final EIS.

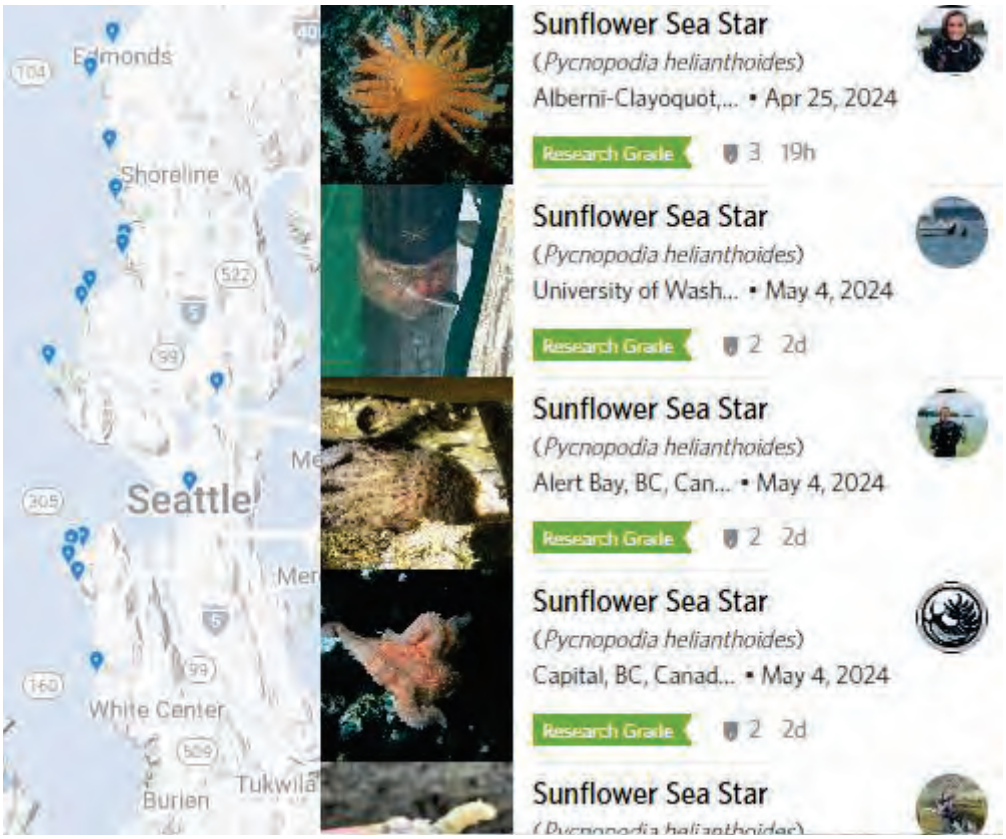


Figure 5: Map showing locations of observations of Sunflower Sea Star along Seattle coast. Visualization from iNaturalist.org.

20-6 cont

RARE SPECIES

Lincoln Park supports a population of native Phantom Orchids (*Cephalanthera austiniae).* It is the only such population known in Seattle and one of just a few in all of King County *(Burke Herbarium, 2024; GBIF.org 2024).* Consideration for rare species should be given in the final EIS.

RARE, SENSITIVE, AND IMPERILED HABITATS

Seattle harbors patches of relatively rare, declining, even imperiled, habitat types. These include

- Old-growth lowland conifer forest, notably at Schmitz Creek Preserve and Seward Park. These ancient forests once covered vast areas of the Pacific Northwest. Most has been lost. Old-growth forests are identified by Washington Department of Fish and Wildlife (2015) as **imperiled and declining**.
- Oregon White Oak Woodlands at Martha Washington Park. Oregon White Oak Woodlands have been identified as **critically imperiled** and declining by Washington Department of Fish and Wildlife (2015).

The final EIS should provide consideration for rare, sensitive, and imperiled habitats in Seattle.

CRITIQUE 3

On pages 3.3-14 through 3.3-15, the DEIS provides a qualitative analysis of impacts to tree canopy based on the expectation that a "higher value in the "New place types" row in Exhibit 3.3.4 indicates a higher potential for development-related impacts to vegetation." The DEIS concludes, then, that Alternative 5 is likely to have the greatest potential for development-related impacts, followed by Alternatives 3, 4, 2, and 1.

RECOMMENDATION, **RATIONALE AND SUPPORTING EVIDENCE 3**

We recommend improving the rigor of analysis and re-examining assumptions to avoid overly optimistic projections of tree retention during development.

The city and public have access to recent, high-resolution spatial datasets for tree canopy as well as urban planning datasets like development capacity, land use, and equity categories. It is straightforward to overlay these datasets to quantify how many acres of tree canopy lie within private, redevelopable parcels in different place types and to compare those across alternatives.

20-6 cont

For example, with easily available datasets, we identified and quantified the acreage of tree canopy on private property on lots that have been classified as "Redevelopable" through development capacity analysis. We could also quantify the amount of tree canopy on each place type under the different alternatives and by equity categories.

Because the development capacity data is the same for all alternatives, the total amount of canopy in private, redevelopable parcels remains the same (Tables 1 and 2). However, Alternative 5 would change the place type on parcels on which more than **700 acres of tree canopy would be at elevated risk of removal due to land use changes. About thirty of these acres are from high-risk equity categories. It would unreasonable to claim, as the DEIS currently does, that increased likelihood of 700 acres of tree canopy loss is not a significant impact that needs to be mitigated for.**

This type of analysis will be critical to see in the final EIS.

We have included a write-up of a similar canopy analysis. We recommend some type of similar, quantitative and spatial approach like that described in Exhibit A at the end of this document in the final EIS.

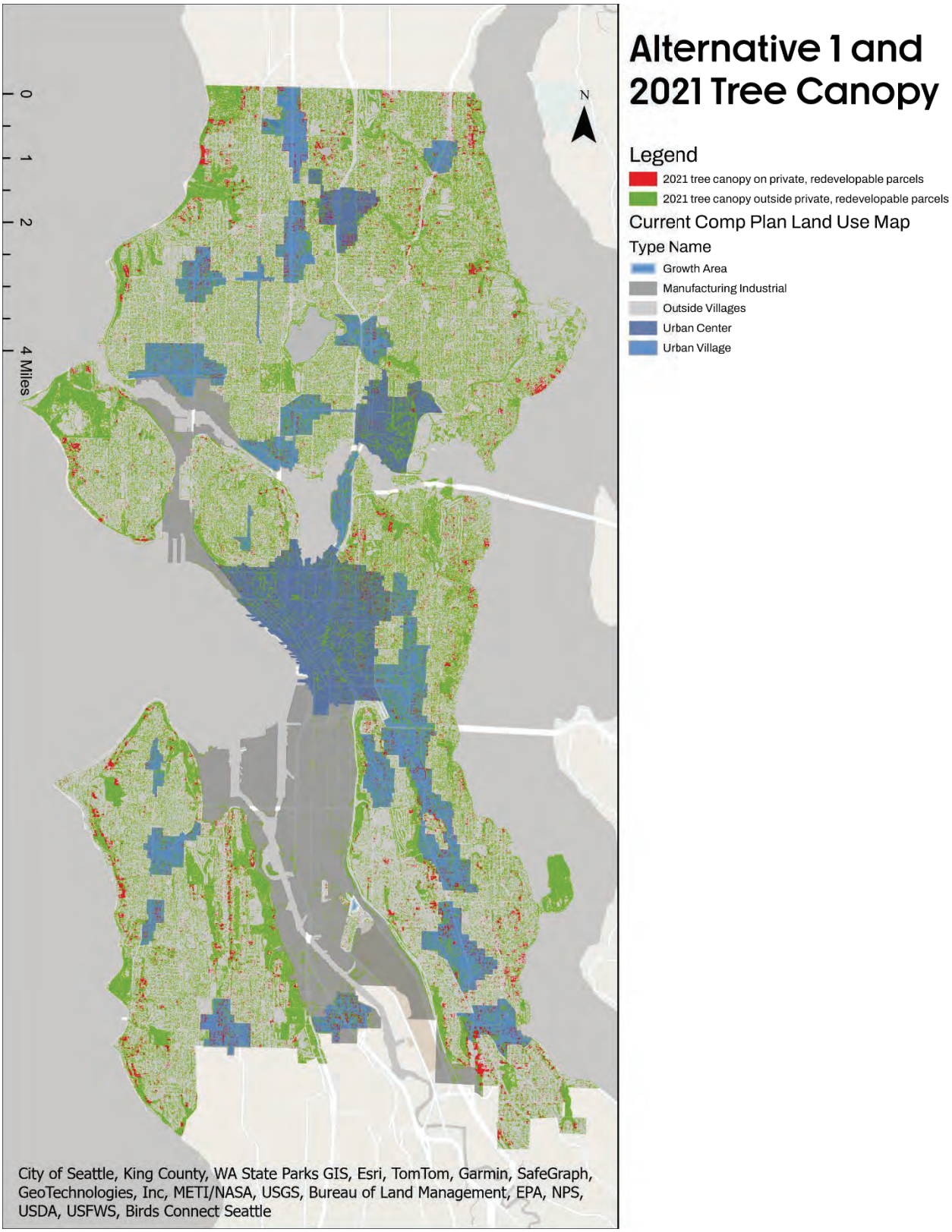


Figure 6: Tree canopy and land use (current Comprehensive Plan)

20-6 cont

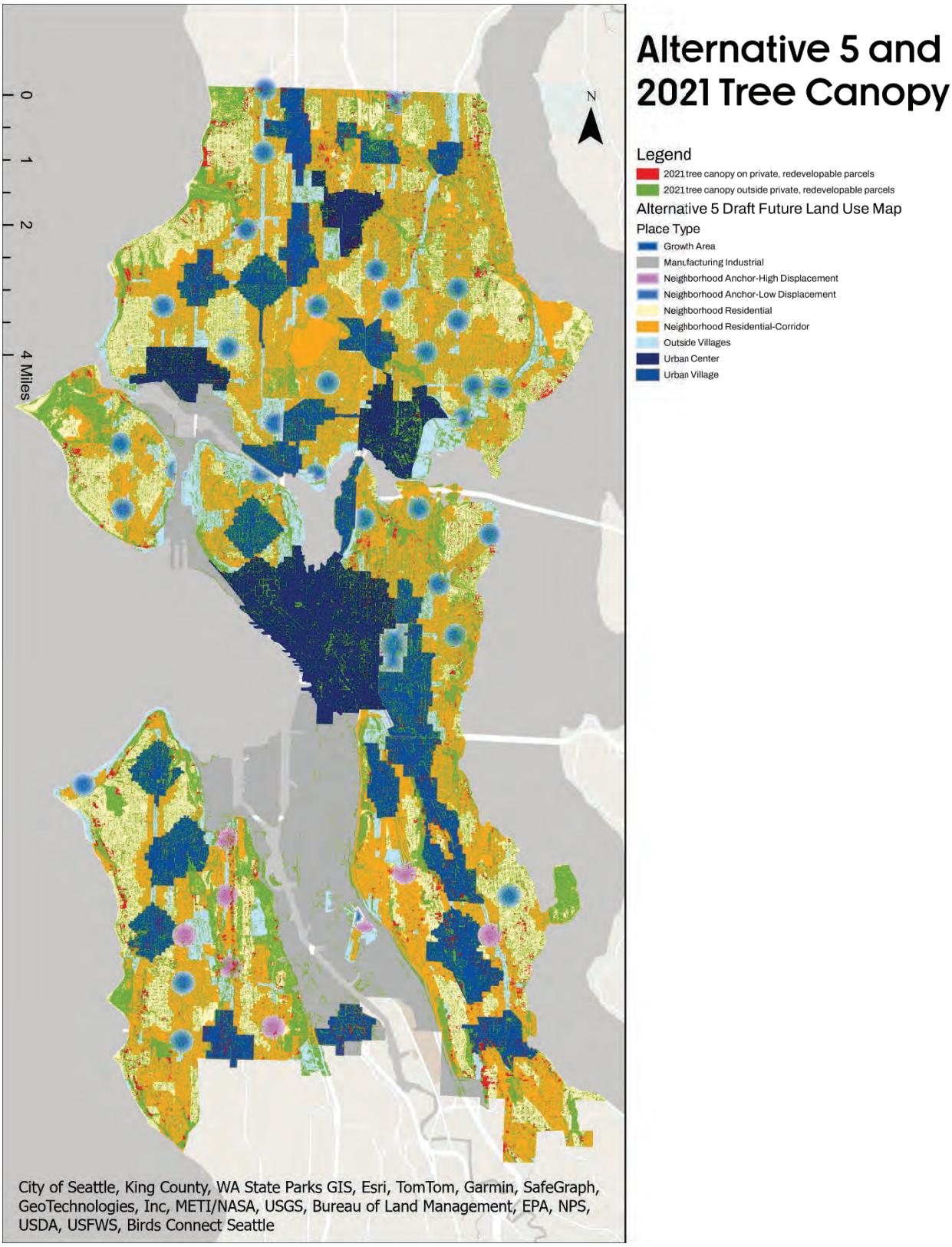


Figure 7: Tree canopy and land use under Alternative 5

20-6 cont

Table 1: Comparison of area in acres of tree canopy by place type and equity category between Alternatives 1 and 5. Alternative 1 does not have four of the same place types as Alternative 5; values in those cases are NA.

Place type	Equity Category / Alternative					
	High Risk		Low Risk		NA	
	Alt 5	Alt 1	Alt 5	Alt 1	Alt 5	Alt 1
Manufacturing Industrial	0	0	2.05	2.05	0	0
Neighborhood Anchor-High Displacement	21.00	NA	0	NA	0	NA
Neighborhood Anchor-Low Displacement	0	NA	32.32	NA	0	NA
Neighborhood Residential	0	NA	0	NA	336.18	NA
Neighborhood Residential-Corridor	0	NA	0	NA	290.81	NA
Outside Villages	0	0	0	0	76.53	771.90
Urban Center	45.14	45.14	19.20	5.21	0	
Urban Village	185.00	177.94	86.63	92.63	0	

20-6 cont

Table 2 Showing the difference in tree canopy area in acres between Alternatives 5 and 1 by equity category and in total. All told, more than 700 acres of tree canopy would change place types between Alternative 1 and Alternative 5, with a corresponding increased risk of removal.

	Delta High Risk (Alt 5-Alt 1)	Delta Low Risk (Alt 5-Alt1)	Delta NA (Alt 5-Alt 1)	Total Delta
Manufacturing Industrial	0	0	0	0
Neighborhood Anchor-High Displacement	21	0	0	21
Neighborhood Anchor-Low Displacement	0	32.32	0	32.32
Neighborhood Residential	0	0	336.18	336.18
Neighborhood Residential-Corridor	0	0	290.81	290.81
Outside Villages	0	0	-695.38	-695.38
Urban Center	0	13.99	0	13.99
Urban Village	7.06	-6.0	0	1.06

CRITIQUE 4

Page 3.3-5 states “Notably, most canopy loss was not associated with development activities; only 15% of the canopy loss occurred on parcels that underwent development during that period.”

The analysis cited is insufficient to support the claim and may lead to false conclusion about the development’s impact on tree canopy.

RECOMMENDATION, RATIONALE AND SUPPORTING EVIDENCE 4

The authors of the 2021 Tree Canopy Assessment defined “redeveloped parcels” as sites that began and completed construction of new buildings that added residential units or new commercial buildings within the identified timeframes.”

This restricted definition of development-associated tree loss does not capture the full impact from development, including tree loss from development activities that started within but ended after the identified timeframe, or that started before but ended in the identified timeframe. This limited analysis has supported a misleading narrative that development is an insignificant driver of canopy decline in Seattle. **20-6 cont**

Even with the restricted definition, the 2021 tree canopy assessment found that development activity on the 1% of parcels that met the criteria to be defined as “redeveloped” accounted for 14% of canopy loss. That is a disproportionate impact, and the true impact from all development activities is certainly higher.

A more complete assessment of all development activities' impacts on tree canopy needs to be incorporated in the final EIS to avoid making overly optimistic projections about the impact of development.

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EXHIBIT A

Identifying Potentially Development-Threatened Tree Canopy in Environmental Justice Priority Areas

Draft April 8, 2024

Joshua Morris, Urban Conservation Manager at Birds Connect Seattle
Email: joshm@birdsconnectsea.org

INTRO

Environmental Justice priority areas in Seattle are census tracts with Racial and Social Equity Index scores that fall within the two highest quintiles.

These communities tend to have lower overall tree canopy cover than whiter and wealthier neighborhoods (2016 Seattle Tree Canopy Assessment) and have experienced higher rates of tree canopy loss in recent years (2021 Seattle Tree Canopy Assessment). Given the important role trees play in community and climate resilience and the benefits they provide to mental and physical health, working with EJ communities to preserve and enhance tree canopy should be a priority for the City.

At the same time, increased demand for housing is driving land use changes and infill development. Parcels on which development occur experience significant canopy loss, 40% on average according to the 2021 Seattle Tree Canopy Cover Assessment.

The City uses Zoned Development Capacity models to identify parcels where redevelopment could occur to increase housing density. These parcels have fewer housing units than would be allowed under their current zoning class. These parcels also often support a significant number of established trees.

In Lowrise, Midrise, Commercial, and Seattle Mixed Zones, development footprint may occupy 85-100% of the lot area, and tree removal in downtown and industrial zones is not regulated under the tree protection ordinance. Trees in these zones on revdevelopable lots, then, are potentially highly threatened by future development.

Understanding the distribution of development-threatened trees and planning to maximize their retention during development is important if the City is to meet its canopy equity goals.

METHODS

Analysis objective: Find tree canopy in Environmental Justice Priority Areas and on private property on underdeveloped parcels in Lowrise, Midrise, Commercial, and Seattle Mixed zones, where 85-100 lot coverage allowed under the new tree protection ordinance, or on Downtown and Industrial zones which are “silent zones” not regulated by the tree protection ordinance.

Datasets

Dataset	Source	Last Updated

Seattle_Tree_Canopy_2016_2021_RSE_Census_Tracts	https://data-seattlecitygis.opendata.arcgis.com/datasets/SeattleCityGIS::environmental-justice-priority-areas/about	Jan 26, 2024
Tree_Canopy_2021_Seattle	https://data-seattlecitygis.opendata.arcgis.com/datasets/SeattleCityGIS::seattle-tree-canopy-2021/about	Jan 26, 2024
Zoned Development Capacity by Development Site Current	https://data-seattlecitygis.opendata.arcgis.com/datasets/SeattleCityGIS::zoned-development-capacity-by-development-site-current/about	Jan 27, 2024
Unofficial neighborhood boundaries	https://www.arcgis.com/home/item.html?id=8adffd6b8fba4a84966fa7471afd0d6c	Nov 29, 2023

Defining and mapping development-threatened tree canopy procedure:

1. Set definition query on Zoned Development Capacity Layer:
   PUB_OWN_TY = 'PRIVATE' And (REDEVSTATU = 'REDEV' Or REDEVSTATU = 'VACANT') And (CLASS = 'MR' Or CLASS = 'C' Or CLASS = 'L' Or CLASS = 'NC' Or CLASS = 'SM' Or CLASS = 'D' Or CLASS = 'I')"
   Intersect tree canopy, EJ priority areas, and zoned development capacity layers called "Development Threatened Tree Canopy 2021 in EJ Priority Areas"
2. Add new field to "Development Threatened Tree Canopy 2021 in EJ Priority Areas" called "DTTC_Acres" (double).
3. Calculate geometry of DTTC_Acres
   Property = Area (geodesic)
   Area Unit = Acres
   Coordinate system = default
4. Intersect Development Threatened Tree Canopy 2021 in EJ Priority Areas with Neighborhoods layer. Call it DTTC_Neighborhoods_Intersect
5. Add new field to "DTTC_Neighborhoods_Intersect" called "DTTC_Hood_Acres" (double).
6. Calculate geometry of DTTC_Hood_Acres
   Property = Area (geodesic)
   Area Unit = Acres
   Coordinate system = default

Estimating street tree canopy contribution to DTTC

1. Dissolve DTTC_Neighborhoods_Intersect on "gridcode" field (=1 for all records). Default settings (create multipart features). Output aggregates the many thousands of DTTC canopy polygons into a single, multipart feature. Call it DTTC_Dissolve
2. Create new point feature class using Create Random Points tool. Constrain the output to DTTC_Dissolve, create 500 points. Output is 500 random points distributed within the boundaries of DTTC_Dissolve. Call new feature class "Random_Point_Assessment"
3. Create new field in Random_Point_Assessment called "Street_Tree" (short, numeric).
4. Set basemap to satellite imagery.
5. Zoom to each random point to determine if the canopy it is associated with is from a tree planted in the public right of way or is rooted on private property. If street tree, assign value "1", else "0"
6. Where determination cannot be made from satellite imagery, use Google Street View.
7. Where determination is uncertain, assume street tree and assign value "1".

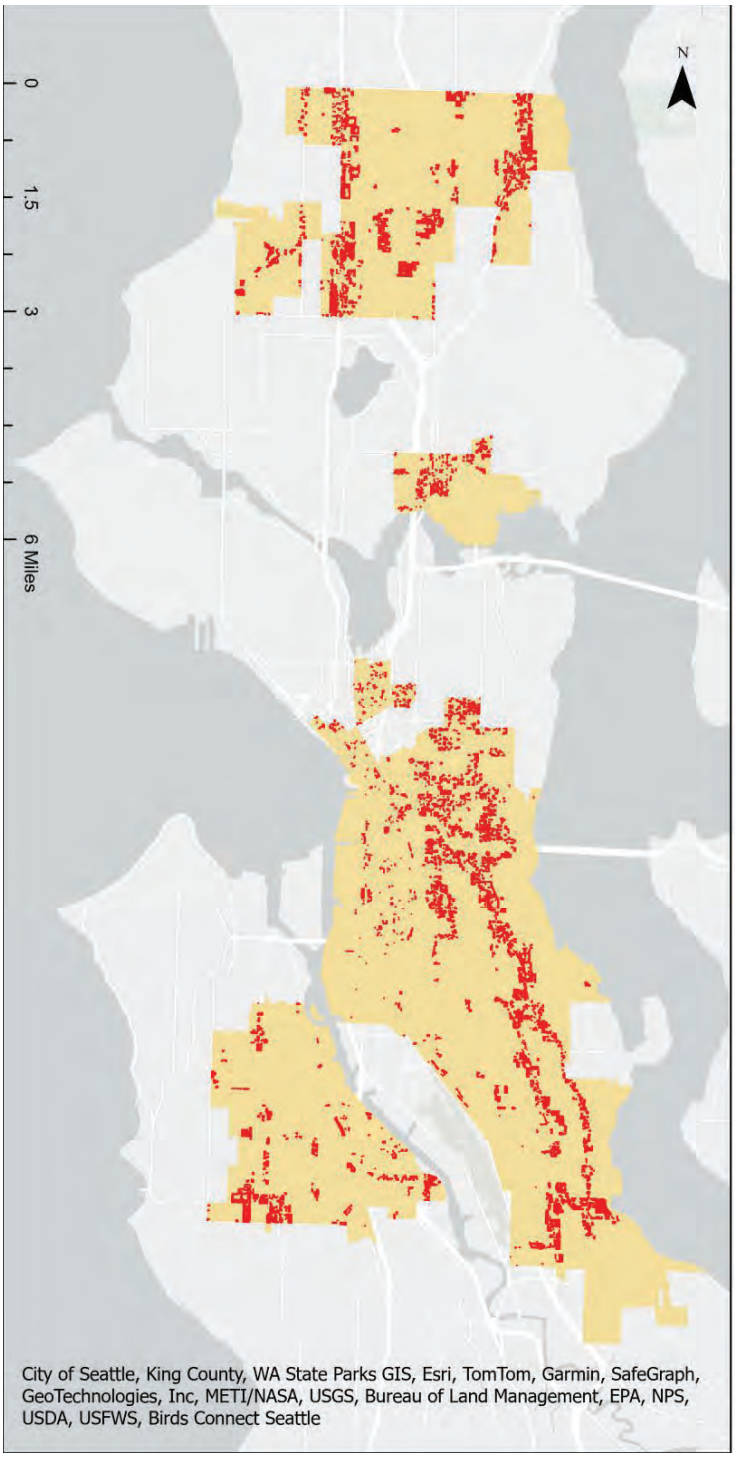
RESULTS

There is a total of 226.7 acres of tree canopy overhanging redevelopable parcels in EJ priority areas. Some of this tree canopy is contributed by street tree canopy spreading from the right of way over private property. Street trees are governed by different regulations than trees on private property and are not the focus of this analysis.

Of a random assessment of 500 points within tree canopy on redevelopable parcels in EJ priority areas, 33 were determined to fall within tree canopy contributed by street trees. I estimate the mean canopy contribution from street trees to be 6.6% (95% Confidence Interval 4.4% to 8.8%).

Therefore, I estimate there are between 207 to 217 acres of development-threatened tree canopy on private property in Environmental Justice Priority Areas.

Map of distribution of development-threatened tree canopy in EJ Priority Census Tracts



Development-threatened Tree Canopy in Seattle's Environmental Justice Priority Census Tracts

Legend

- Development-threatened Tree Canopy in EJ Census Tracts
- Environmental Justice Priority Census Tracts

Results by neighborhood

Neighborhood	Acres of Development-threatened Tree Canopy in EJ Priority Areas

	Mean Estimate	Lower 95% CI Estimate	Upper 95% CI Estimate
North Beacon Hill	15.60	15.24	15.97
Atlantic	13.92	13.59	14.25
Columbia City	13.86	13.53	14.18
Dunlap	13.79	13.46	14.11
Haller Lake	11.36	11.10	11.63
Rainier Beach	11.13	10.87	11.39
North College Park	9.00	8.79	9.21
South Delridge	8.80	8.59	9.01
Greenwood	7.79	7.60	7.97
Brighton	7.74	7.56	7.92
Minor	7.47	7.29	7.65
South Beacon Hill	7.42	7.24	7.59
Highland Park	7.23	7.06	7.40
Olympic Hills	6.44	6.28	6.59
Mid-Beacon Hill	6.18	6.03	6.32
Maple Leaf	5.91	5.77	6.05
Pinehurst	5.46	5.33	5.58
University District	5.41	5.28	5.54
Cedar Park	5.14	5.02	5.26
Mount Baker	4.97	4.85	5.08
High Point	4.20	4.10	4.30
South Park	3.65	3.56	3.73
Industrial District	3.06	2.99	3.13
Meadowbrook	2.88	2.81	2.94
Bitter Lake	2.69	2.63	2.75
Riverview	2.66	2.60	2.72
International District	2.40	2.35	2.46

Roxhill	2.06	2.01	2.11
Crown Hill	1.68	1.64	1.72
Yesler Terrace	1.53	1.49	1.56
Victory Heights	1.34	1.31	1.37
Leschi	1.29	1.26	1.32
Stevens	1.26	1.23	1.29
Broadway	0.94	0.92	0.96
Holly Park	0.91	0.89	0.93
Mann	0.83	0.81	0.84
Broadview	0.80	0.78	0.82
Wallingford	0.73	0.71	0.75
South Lake Union	0.56	0.55	0.57
North Delridge	0.48	0.47	0.49
Belltown	0.41	0.40	0.42
Pioneer Square	0.22	0.21	0.22
Madrona	0.18	0.17	0.18
Seward Park	0.10	0.10	0.10
Central Business District	0.08	0.07	0.08
First Hill	0.06	0.05	0.06
Ravenna	0.05	0.05	0.05
Pike-Market	0.03	0.03	0.03
TOTAL	**211.65**	**206.66**	**216.63**

Results by zone class

Zone Class	**Acres of Development Threatened Canopy in EJ Priority Areas**		
	Mean Estimate	**Lower 95% CI Estimate**	**Upper 95% Estimate**
Lowrise	100.23	97.87	102.59

Neighborhood Commercial	47.33	46.21	48.44
Commercial	26.46	25.84	27.08
Industrial	14.04	13.71	14.37
Midrise	11.20	10.94	11.46
Seattle Mixed	8.78	8.58	8.99
Downtown	3.60	3.52	3.68
TOTAL	211.65	206.66	216.63

DEIS StoryMap Comment

Name: Tiffani McCoy

Organization: House Our Neighbors

Email: tiffani@houseourneighbors.org

Date: 4/22/2024

Comment:

Allow for More Family-Sized Homes in Middle Housing: Increase the Floor Area Ratio (FAR) for fourplexes and sixplexes, to make it possible to build more family-sized homes. The proposed FAR would limit development of three- and four-bedroom homes, which are essential to meet the diverse needs of our growing city, accommodate families, and create new homeownership options.

Allow More Homes Near Transit: Allow midrise and mixed-use housing within a 5-minute walk of frequent buses. Building homes near transit gives people more choices in how they get around their neighborhoods and makes transit a convenient option for more people. And building those homes off arterials but still near transit gives people the opportunity to live in quiet, low-pollution, and car-light neighborhoods. 21-1

Expand Neighborhood Centers: Enhance the proposed Neighborhood Centers, to create lively, walkable community hubs throughout Seattle. We suggest increasing the radius of Neighborhood Centers from 800 feet to ¼ mile and adding in all the Neighborhood Centers studied in the DEIS (but not implemented in the Draft Plan). This would equitably balance growth across the city, increase access to communities like Alki, Seward Park, North Broadway, North Magnolia, and Northlake, and allow more people to meet their daily needs by walking or biking.

Promote Equitable Development and Address Displacement: Ensure density bonuses, development regulations, and other tools, allow a broad range of developers, including the social housing developer, to build affordable housing for sale and for rent without relying on scarce public funding. 21-2

Allow for Tall and Green Homes in Centers: Increase height limits to 12-18 stories in Regional Centers such as Capitol Hill, the U District, Northgate, and Ballard, to allow more people to live in some of Seattle's most vibrant neighborhoods. Additionally, allow midrises up to 85 feet in transit corridors and Neighborhood Centers, to maximize the potential of wood-frame construction.

DEIS StoryMap Comment

Name: Bambi Chávez

Organization: Black Home Initiative (BHI) Network

Email: bambi@housingconsortium.org

Date: 5/6/2024

Comment:

To Whom It May Concern:
Black Home Initiative (https://www.blackhomeinitiative.org/) is a regional effort that seeks to target the racial inequities at the core of the housing ecosystem in an effort to increase the number of BIPOC households who successfully secure homeownership. Our initial emphasis is on Black households; within five years, the goal is to make the opportunity to own a home, and the potential benefits of that asset, available to 1,500 new low- and moderate-income Black homeowners. The ultimate impact we aspire to is the reduction of inequity and an increase in intergenerational household wealth. 22-1

With these aspirations in mind, we have developed the list of suggestions below for your consideration as you revise your One Seattle Plan draft and delineate what will be examined in the final environmental impact study. We want to thank you for the careful and diligent work you have done to produce the current One Seattle Plan draft and DEIS. Much of the language in the draft plan document aligns with our values, but we ask that you go bolder in your plan to ensure that our shared vision of an equitable Seattle can be realized. Our suggestions are an invitation to further dialogue, and we look forward to connecting with you as this process of vision setting continues.

Black Home Initiative (BHI) Comp Plan Draft & DEIS Comments:
1. Density bonuses, development regulation flexibility, land incentives, and technical assistance should be studied in the FEIS and included in the final comp plan to support:
a. affordable homeownership and rental production
b. affordable family-sized 3+ bedroom middle housing homeownership and rental units
c. affordable homeownership and rental units within a stacked flat building typology
d. permanently affordable homeownership opportunities through community land trusts and limited equity cooperatives
e. community-based organizations to create, or partner in the creation of, community-led and community-owned affordable homes and third space developments
f. legacy homeowners in redeveloping their property to create affordable housing units for themselves, their families, and current and past legacy residents
g. non-legacy homeowners in redeveloping their property to create permanently affordable housing units with preference to current and past legacy residents
h. legacy homeowners who would like to develop corner stores

2. Displacement pressures are reduced when there is an abundance of affordable housing options throughout the city. To achieve this goal, would like to see the following studied in the FEIS and included in the final comp plan:
a. all neighborhood centers that were in the DEIS
b. neighborhood centers defined as inclusive of a ¼ mile radius
c. midrise and mixed-use housing within a 5-minute walk of frequent transit 22-2

d. midrise housing up to 85’ in transit corridors and urban centers
e. highrise housing of 12-18 stories in regional centers

3. Eliminate parking mandates citywide.

4. At minimum, align Seattle’s middle housing standards with the Department of Commerce model ordinance to ensure middle housing can be feasibly built throughout the city.

5. We support the anti-displacement intention of the triplex development standards you are proposing for high displacement risk areas. However, we are concerned about the unintended consequences of this restriction. We request that you provide more information about the potential impacts of the triplex standard as written and engage in conversations with current and past residents of high displacement risk areas to inform any zoning language. We would also recommend that you study a triplex standard that exempts projects that will have owner-occupied units, affordable units, or units developed by a community-based organization, or in partnership with a community-based organization. As stated in item #1 above, we believe that the city should be incentivizing the development of owner-occupied, affordable, and community-led-&-owned units through density bonuses, development regulation flexibility, land incentives, and technical assistance. Such assistance is particularly pertinent in areas at high risk of displacement where development should reflect the will of current and past residents of these areas.

22-2 cont

6. Study in the FEIS, and include in the final comp plan, a city land banking and land disposition process to support community-based development orgs to create, or partner in the creation of, community-led and community-owned affordable home and third space developments.

7. In the FEIS, please disaggregate projections about the number of housing units per AMI group from the city-level to a neighborhood or district-level scale for comparative analysis.

22-3

8. OPCD visited community groups to inform their comprehensive plan draft and we would like to see OPCD revisit these community groups to present the FEIS and zoning changes and request their feedback.

Letter 23

FRIENDS OF RAVENNA-COWEN

May 4 2024

To: OneSeattleCompPlan@seattle.gov
To: PCD_CompPlan_EIS@seattle.gov
cc: Bruce.Harrell@seattle.gov , maritza.rivera@seattle.gov

The Friends of Ravenna–Cowen submit our comments below on the One Seattle Plan and the DEIS for the One Seattle Plan.

The Friends of Ravenna–Cowen (FORC) is a not-for-profit neighborhood group established to *"preserve and protect the history and natural environment of the Ravenna-Cowen neighborhood as a shared community resource for all, and to support other like-minded neighborhood and not-for-profit groups."* With this mission in mind, we are providing our comments, focusing primarily on historical/cultural resources, land use/housing, and plants/animals. We acknowledge the need for affordable housing and increased density is some areas of the City, but this must be done in concert with protection of our natural and historical resources. While many of our comments may reference specific issues for the Ravenna-Cowen area, these also generally apply to many areas within Seattle.

23-1

Background:

FORC was organized in 2016 to celebrate and raise awareness of the neighborhood to the north and west of Ravenna and Cowen parks. This area includes many examples of historically significant architecture, numerous heritage trees, and the incomparable public resources of Ravenna and Cowen Parks.

In 2018, thanks to thousands of hours of volunteer work, the Ravenna-Cowen North Historic District was listed in the National Historic Register of Historic Places, as well as the Washington State Register of Historic Places, where it joins other districts which contribute to the rich cultural heritage of Washington State. Our neighborhood is architecturally intact and represents a fascinating period in the development of the City of Seattle. Ravenna's architectural resources highlight a period of rapid growth in the early 20th century, encompassing the history of Ravenna and Cowen Parks; the Olmsted legacy; the streetcar era; development of the University of Washington's environs (along with the 1909 Alaska Yukon Pacific Exposition); and the rise of a "bungalow" style that provided homes for working families and university staff. Following the NHD designation, FORC has been organizing various public events, including several different walking tours that focus on the history, architectural elements, and natural environment of the NHD; these have been very well received and have had a positive effect. Many people from various parts of our city come to the RCN NHD to learn more about our city and to walk in an interesting historic neighborhood.

The proposed One Seattle Plan Land Use Goal LU G16 (page 59) identifies three important reasons to preserve, maintain, and celebrate historical and cultural resources. The RCN NHD fulfills all of these.

FRIENDS OF RAVENNA-COWEN

The RCN NHD will be adversely affected by all alternatives detailed in the One Seattle Plan unless sufficient, meaningful mitigation is developed, as detailed below.

1. **Historic/Cultural Resources**.

The proposed changes to the Neighborhood Residential Zone create an impetus for redevelopment of historic homes within the RCN NHD that is incompatible with the historical architectural context and reduce the number of contributing resources to a point that the NHD will completely lose its significance and status as a nationally-recognized historic district. This will be an irreversible loss and no protection nor special review of the NHD is provided. [This was a shortcoming of E2SHB 1110.] This adverse impact affects historical/cultural resources (known and unknown) and historic districts throughout Seattle. Meaningful, and adequate mitigation must be provided for ***all*** NHDs within Seattle or these resources will be lost.

23-1 cont

While the DEIS acknowledges these losses as "significant unavoidable adverse impacts" for all alternatives, this is reprehensible because Preservation of historical/cultural resources is promoted as a goal (Goal LU G16) and stronger mitigation must be developed and implemented if this goal is to be taken seriously. Specifically:

- Policy LU 16.1 talks about maintaining a comprehensive survey and inventory of Seattle's historic and cultural resources, but this inventory is very incomplete and still needs significant development! This inadequacy must be addressed or resources will be lost due to lack of knowledge/recognition. This is where "advance planning" can actually work (see DEIS page 3.9-121, last paragraph) because it would help *avoid* adverse impacts on historic/cultural resources.

- Policy LU 16.3 talks about supporting designation of areas as historic, cultural, and special review districts, but NHDs are not recognized as special review districts or exemptions. Recognition of NHDs must be added here! Recognition and protection for NHDs must be part of mitigation or these will be lost due to redevelopment related to upzoning and the One Seattle Plan.

- Policy LU 16.4 talks about tailoring development standards for a special review district, but this policy needs to include NHDs or they will be degraded and lose their historical/cultural integrity and ability to interpret Seattle's history

- Policy LU 16.5 talks about encouraging adaptive reuse of designated landmark structures by allowing uses in these structures that might not otherwise be allowed under the applicable zoning. This policy should also be applied for structures in historic districts and NHDs in cases where this approach could help the district retain its architectural integrity.

- Policy LU 16.6 talks about incentives to restore or reuse designated landmark structures and specified structures within designated districts. While this policy is fairly narrow, it should be *broadened to include additional incentives for restoration and reuse of historic structures* and *should also apply to NHDs* but fails to include them. These incentives should also apply to NHDs and/or contributing structures within NHDs to avoid or mitigate adverse impacts and to prevent loss of the NHD's integrity.

- Policy LU 16.7 talks about protecting the scale and character of the established development pattern in historic districts, while encouraging compatible and context-sensitive infill development. This is a very important policy! However, it fails to include NHDs. These incentives should also apply to NHDs to avoid or mitigate adverse impacts.

23-1 cont

The DEIS provides a list of "Potential Mitigation Measures (see pages 3.9-119 and 3.9-120). While many of these can be helpful and/or are already required under other regulations, mitigation for historic/cultural resources and NHDs needs to incorporate these measures more substantially.

Also, please consider that mature trees and landscape are elements of RCN NHD, as well as many other historic/cultural districts. Protection of these not only provides part of the context for NHD, but recognition of the NHD reciprocally can help protect these elements of the environment.

2. Land Use/Housing.

For Regional Centers, GS 3.2, p. 22 has the language "Recognize and plan for the unique role and character of different neighborhoods within large regional centers." ***We request that the same language apply, and that the same language be added for Urban Centers (GS 4, p. 24 and 25) and Neighborhood Centers.*** The Roosevelt Urban Center (p. 25) is a mix of commercial, high rise and "craftsman."

23-2

3. ***With regard to GS 4 and related LU policies:***

LU 2.9 (p.38) states: *Encourage the preservation of characteristics and features that contribute to communities' multiple identities, including in areas of historic, architectural, cultural, or social significant."* This is a very important policy and it needs to be taken seriously.
To help facilitate this, LU Policies should be added to recognize and plan for the unique role and character of different neighborhoods:

- Note that the definition of middle housing in E2SHB 1110, p. 5, para (21) (lines 32- 35), "means buildings that are compatible in scale, form, and character with single-family houses ... ["single family" is defined at p.7, para.32, lines 32-34.])

  Add a new LU _ that states the same language as above – *Middle housing means buildings that are compatible in scale, form, and character with single-family houses.*

- Add the italicized language to LU 4.1 (p.40). Allow for flexibility in development standards so existing structures, *trees and green space* can be maintained and improved and new development can respond to site-specific conditions. As an example, this link shows how a DADU was built to preserve the tree:
  https://nwgreenhometour.org/ghtoursite/matthews-beach-cottage-2024/

- LU 4.18 (p.48), second bullet, add italicized language – responds to the surrounding neighborhood, *character,* and context, including historic resources. Thus, for the RCN NHD and any other NHD, the type of housing built should preserve the character of the NHD.

With regard to housing/displacement:

The proposed upzoning will increase the tax base for properties in the RCN NHD that will continue to displace owners from our neighborhood (this has been happening since the last rezone) as property taxes have become unaffordable for homeowners. This trend shifts ownership of these historic homes and many historic properties to developers and lessors, thus consolidating the trend of land ownership. This applies to any other NHD or historic district, and LU policies to prevent this are inadequate.

Another type of housing that exists in our neighborhood and the RCN NHD, which is located close to the University of Washington, is the group home, usually a historic home that has been rented to a group of unrelated people who often are college students and/or people with jobs in Seattle. This type of housing offers an often more affordable alternative for housing groups of people, as well as for people who prefer older buildings and garden areas.

23-2 cont

This type of housing will be displaced by redevelopment. As discussed under Natural Environment below, many existing Seattle homes can be subdivided or use a "community" model with four bedrooms with the other spaces for the shared use within the structure. Adding policies to further protect this type of use increases housing flexibility and can help protect historic housing.

Still of concern is that while the One Seattle Plan would create additional housing units per the directive of E2SHB 1110, increasing the number of units will not bring affordability; the "trickle-down effect/Reaganomics notion" does not work. Thus, the proposed impacts on displacement and historic preservation caused by the proposed upzoning would occur without bringing enough benefit to justify the losses. This was largely the basis behind the recent Los Angeles County Superior Court ruling that overturned CA Senate Bill 9, which had overturned single-family housing in five California cities. See: https://www.latimes.com/homeless-housing/story/2024-04-29/law-that-ended-single-family-zoning-is-struck-down-for-five-southern-california-cities .

23-2 cont

3. Plants and Animals/Natural Environment.

A stated goal of the Comprehensive Plan is to "protect and enhance" the natural environment (p.36). This document includes some positive goals and policies but falls short in several areas.

Furthermore, the DEIS falls short:

The DEIS, 3.1.3, states that "*Projects that entail vegetation clearing would likely reduce the diversity and/or abundance of plants and animals on and near the affected parcels. These impacts would be expected to diminish over time as vegetation regrows in temporarily disturbed areas."* Most projects that are moving forward are maximizing lot coverage, with little setbacks or vegetative areas around them. This general statement is misleading and implies a no problem exists when developments occur. Mitigation must address this issue.

23-3

The DEIS, p. 3.3-7, states, *"In 2023,... the city's tree ordinance was updated. It is anticipated that these updates will decrease the rate of canopy loss associated with residential and commercial development."* Many urban forest practitioners, including Seattle's Urban Forestry Commission, do not share the expectation that the new tree protection ordinance will decrease the rate of canopy loss associated with residential and commercial development, especially on Multifamily, Commercial, and Seattle Mixed Zones. The combination of high hardscape allowances, rigid delineation method for tree protection areas, and reduced authority by departments to request alternate designs to accommodate tree preservation make it likely that any sizeable, regulated tree on these lots would be permitted for removal.

The DEIS conclusions are hypothetical, not fact-based:

The DEIS concludes, "Action alternatives would tend to increase regional tree canopy by focusing growth in urban areas and preventing sprawl." "[D]evelopment within the urban environment of Seattle could indirectly benefit the tree canopy pressure in less-developed areas outside the city." (Emphasis added.) The DEIS does not identify any data supporting an indirect benefit that regional tree canopy would increase, not even the acreage currently remaining that is less developed. Sprawl continues, with suburban areas with lawns that do not provide needed habitat for birds and other wildlife. Nor does the DEIS identify the reasons people seek housing outside Seattle. And, apparently, no one at OPCD has bothered to traverse the "region." King County is rapidly becoming one big sprawl as people search for more affordable housing options outside of Seattle. Moreover, state law (E2SHB 1110) now requires most municipalities to increase density, which could mean more tree cutting region-wide. The DEIS conclusions are fictitious, unsupported hypotheses and pure fantasy.

23-3 cont

The reality is that if real mitigation to preserve Seattle's tree canopy is not implemented immediately, Seattle will be a polluted, heated environment impacting its residents, other animals and native flora. One only has to look at the Roosevelt Urban Village, parts of which transformed within four years to a heat island.

With regard to the tree canopy:

On p. 150, Goal CE G12 refers to the tree canopy goals and lists several related policies. The following goals/policies should be added:

- Strengthen and enforce tree protections throughout the City to ensure Seattle's current canopy tree policies and goals continue. The Seattle One Plan would inexplicably reduce that policy's goals.

The 2035 Seattle Comprehensive Plan includes Policy EN 1.2 (p. 133) which states, "Seek to achieve citywide tree canopy coverage to **30 percent by 2037, and 40 percent eventually,** which maximizes the environmental, economic, social, and climate-related benefits of trees." This is **current Seattle policy**. Current Seattle Policy also includes Policy EN 1.7 which states, "Promote the care and retention of trees and groups of trees that enhance Seattle's historical, cultural, recreational, environmental, and aesthetic character." ***Both policies should be retained.***

However, for unexplained reasons, without discussing the adverse implications of this major reduction in tree canopy, the Seattle One Plan changes **current policy to a *goal* of 30 percent with no increase over time.** Moreover, the goal, CE G12 (p.151) *makes a false statement of fact.* The actual current tree canopy is 28 percent due to a loss of 235 acres, the size of Green

Lake. CE 12 maintains "Seattle has a healthy urban forest with a tree canopy that covers at least 30% of the land [FALSE]…

It is critical that the Seattle One Plan maintain the 2035 Comp Plan Policies EN 1.2 and EN 1.7, for multiple reasons:

- The more trees, the better. Trees absorb and mitigate water run-off. Trees absorb pollution. Trees reduce carbon. Trees reduce heat, which is why Seattle is trying desperately to plant more trees in underserved communities to prevent residents from dying. Currently, due to recent development in Neighborhood Residential areas, 19%, or more, tree canopy was lost. Seattle One Plan, Ex. 3.3-7. Neighborhood Residential has the highest percentage of trees in the city. The Ravenna-Cowen NHD is a green oasis with plentiful trees and green cover where Roosevelt residents now come to escape from their heat island high-rise homes. The NHD represents a historic era and embodies the reasons current Policy EN 1.7 should remain in effect.

23-3 cont

- Trees also contribute to a personal sense of well-being and reduce crime. https://www.motherjones.com/environment/2019/04/trees-crime-cincinnati-philadelphia-ida-b-wells-chicago/.

- Adequate tree canopy is essential for birds and other wildlife. Among the 120+ birds tabulated city-wide by the annual Seattle Audubon Christmas Bird Count, tree-dependent species include: Pileated, Hairy, Downy, Northern Flicker and Red-breasted Sapsucker Woodpeckers; Barred, Western Screech, Great Horned and Saw-whet Owls; Cooper's, Sharp-shinned, and Red-tailed Hawks; Black-throated Gray and Townsend's Warblers, Pacific Wren, Brown Creeper, Red-breasted Nuthatch, and Varied and Swainson's Thrush. These birds require a dense forest canopy in which to hunt, feed, nest and take cover. These birds become scarce when tree canopy cover falls below 20%. There is a direct relationship between bird abundance and tree canopy. Some might say, just develop everything except the designated parks and green spaces**. *As all major wildlife and bird organizations and conservation scientists will tell you, however, these "postage stamp" preserves are not viable unless green corridors connect them. The tree canopy in Seattle is critical to ensure these green corridors.***

  The Ravenna-Cowen/Roosevelt community is keenly aware of the impact from tree reduction. Our naturalist conducted a bird count. From Ravenna Park north, the bird species decreased dramatically as the trees diminished. Due to development in Roosevelt, where high-rise apartment buildings developers bulldozed all the trees, within a few years that area became a heat island with few birds and few species.

- Need for Additional Policies and Goals Due to Climate Change Impact on Tree Canopy. The Seattle One Plan contains two policies that address tree canopy and climate change, CE 12.2 and CE 12.3 (p. 150). Additional policies are need to address this existential issue. Tree death from heat is acknowledged in the discussion, but the policies are vague. Communities around the world are emphasizing the use of native flora in landscapes and researching the use of species that would adapt readily to warmer climate. See: https://www.discovermagazine.com/environment/cities-are-rethinking-what-kinds-of-trees-theyre-planting If Seattle is to retain a healthy tree canopy, the Seattle One Plan must address this issue with more specificity, with specific goals, policies and time-tables. This issue requires research, knowledgeable staff, and funding.

23-3 cont

With regard to the natural environment and urban wildlife:

- The Climate and Environment Section beginning on p. 137, should include **more specific goals and policies regarding the significance of biodiversity and urban wildlife.**

  This idea is reinforced by Professor John Marzluff, University of Washington Ornithology, who points out in his book Welcome to Subirdia, "When natural land cover measured across areas the size of neighborhoods, metropolitan areas or counties drops to less than one-third of its historical extent, its ability to sustain native biodiversity crumbles." Marzluff warned that "…not considering the amount and arrangement of green spaces that connect urban people with nature is inefficient and dangerous." He added, ***"To remember what biodiversity is, and why it is important, we must conserve nature close to where we live and work."***

  Neither the Seattle One Plan nor the Seattle Plan DEIS provide any base-line data as to the current bird count (by number and species) for indigenous and migratory birds and the impact of the Plan.

  Specific policies regarding natural environment and urban wildlife should include the following:
  - First, determine status and trends of biodiversity within Seattle;
  - Recognize and support Indigenous-led conservation and environmental stewardship;
  - Seek new financing mechanisms and incentives for conservation, natural space management, urban forestry, etc.;
  - Protect and enhance habitat quality within natural areas, parks, and open spaces

- Reduce urban hazards to biodiversity, including pesticides; reflective glass; plastic and other pollution; and negative impacts from certain human-associated and introduced species, such as outdoor cats and unleashed dogs.
- Encourage residents and visitors to learn about, celebrate, study, and conserve urban biodiversity.
- Maintain current trees and green cover on Neighborhood Residential and Multifamily lots.

23-3 cont

With regard to Mitigation:

The DEIS mitigation options are incomplete and fail to consider substantive steps and regulations that would reduce loss of trees/wildlife habitat. The mitigation measures below will help preserve trees and green cover on Neighborhood Residential lots

- *Amend the Seattle Tree Ordinance as recommended by the Urban Forestry Commission.*

- *Retain current Neighborhood Residential setback requirements.* This will reduce the likelihood that tree canopy and green cover will be reduced.

- *Require developers to design projects that preserve trees, with oversight by professionals who know how to accomplish this.* While the DEIS sets out "green" alternatives, such as permeable driveways, solar panels, wood construction, limiting fossil fuels, it inadequately addresses the most valuable of our green resources, trees. There is technical knowledge on how to build and protect trees. Groups of architects now design buildings focusing on tree preservation. See, for example, Matthews Beach Cottage – NW Green Home Tour. To accomplish retention of as many trees and green space on Neighborhood Residential lots, the DEIS is deficient because it did not address solutions, such as requiring developers to identify the location of trees and species at the onset of the permitting process; requiring the developer to design the project to retain the maximum number of trees, with oversight by arborists and other professionals who understand how to accomplish tree retention.

- *Encourage, Provide Incentives for, and Assistance with the Repurposing of Existing Neighborhood Residential Housing, or Mandate Repurposing of Existing Structures and Building, and Mandate That New Construction Be Limited to the Original Footprint of the House.* These steps will help preserve existing trees, reduce tree loss and tree damage. While the DEIS mentions retrofitting, it does not apply or study the applicability and impact of retrofitting to Neighborhood Residential houses. Many

Neighborhood Residential houses can be retrofitted for four or more units (or three units plus a DADU), or converted to shared community housing (now authorized by state legislation), meaning residents have separate bedrooms but share other spaces. Examples include fraternities and sororities, multi-generation households, and group homes in high-density cities (e.g., New York City and others) where shared living is common and each tenants pays rent.

23-3 cont

With regard to Access to Public Open Space, p. 157:
This section speaks to "Public Space" and uses this term to imply parks and natural areas. Public Space can be unfortunately be interpreted by some as a concrete plaza. This term should either be deleted or defined as a space that include a majority of natural landscaping similar to the definition of the "Open Space" (which is defined as containing elements of the natural environment). Courtyards and the like should be incentivized by the City for new developments, but again these must include natural landscaping.

If you need further information or would like to meet with the FORC Board, you can reach Larry Johnson at 206-406-8488 or lejohnson@friendsofravennacowen.org.

Thank you for your consideration.

Larry E. Johnson, AIA, President, Friends of Ravenna-Cowen

Lori Cohen, Vice President and Secretary, Friends of Ravenna-Cowen
Judith Bendich, Secretary, Friends of Ravenna-Cowen
Lani Johnson, Boardmember, Friends of Ravenna-Cowen
Jackie Lum, Boardmember, Friends of Ravenna-Cowen
Francesca Renouard, Boardmember, Friends of Ravenna-Cowen
Darnell Samuelson, Boardmember, Friends of Ravenna-Cowen

Ballard Alliance

May 6, 2024

VIA EMAIL

Office of Planning and Community Development
Seattle City Hall
600 4th Avenue, 5th Floor
Seattle, WA 98104
Attn: Rico Quirindongo
Email: PCD_CompPlan_EIS@seattle.gov

Re: Comments on One Seattle Plan Draft Environmental Impact Statement

24-1

Dear Mr. Quirindongo,

On behalf of the Ballard Alliance, we would like to thank you for meeting with our organization to discuss the City's One Seattle Plan ("Plan") and its potential impacts on our Ballard neighborhood.

The Ballard Alliance is a business and community development organization committed to ensuring that our Ballard community remains a unique, distinct, and economically vital area for its visitors, residents, businesses, and property owners. Through our programs and services, we strive to cultivate a vibrant and thriving environment in Ballard, focusing on urban design and transportation, economic development and business retention, marketing and promotions, and maintaining a clean, healthy, and safe neighborhood.

We share many of the goals expressed in the Plan and appreciate the City's dedication to increased affordable housing and to healthy commercial areas. After reviewing the Draft Environmental Impact Statement ("DEIS"), we believe that several issues would benefit from additional attention and review.

We request that the Final Environmental Impact Statement ("FEIS") and future planning processes reflect attention to the following issues:

1. **Expedite the subarea plan:** If Ballard is designated as a Regional Center but its subarea plan and implementing zoning is not completed until 2027, as the proposed current timeline suggests, the uncertainty around the potential zoning specifics may stifle investment in Ballard as owners wait for clarity. If Ballard is to be designated as a Regional Center, we encourage the City to prioritize the implementation of the subarea plan to be the first to be completed.

   Additionally, as part of the subarea planning process, the City should ensure that the Ballard Alliance and our members, who have a deep commitment to the success of Ballard and the unique needs, character, history, and opportunities in our neighborhood, are represented on any further subarea planning initiatives, committees, and outreach. We encourage the City to study the unique needs of our retail stakeholders and the successes of our Ballard-specific design guidelines through additional urban design and retail studies in the subarea plan. Lastly, as we understand from our University District colleagues who implemented a similar effort

with the U-District rezone, this subarea planning effort will require significant time and commitment from Ballard Alliance staff and members. We encourage the City to explore grant and other financial support, as authorized by law, to compensate for highly active participation.

24-1 cont

2. **Preserve existing density along the Market Street retail core:** Within the potential Regional Center, we encourage the City to focus the significant additional growth, height, and density near light rail and along the key north-south corridors above Market Street, such as 15th Avenue NW. While the potential Regional Center designation may support 160 foot (or taller) high-rise density near the light rail station, we encourage that highest density to be targeted. The unique retail core of Market Street – between 15th Avenue and 24th Avenue – should be carefully designed to support the vibrant, mixed-use retail and residential character of that area. Ballard Alliance members wish to avoid the potential for a "canyon" effect along Market Street.

3. **Perform a cumulative transportation analysis:** With the potential Regional Center designation, we also express concern about existing and planned projects that pose significant impacts on our community, such as the Route 40 bus-only lanes and Burke-Gilman Trail expansions, which will impede key arterials and threaten future growth and accessibility in Ballard. As part of the FEIS, the City should provide a more detailed cumulative analysis of potential Regional Center neighborhood transportation systems with includes planned SDOT projects within our neighborhood. We encourage this to be completed both at the FEIS stage so the City can understand the potential transportation related needs with a Regional Center designation, and if the City adopts the Regional Center, further analysis will likely be needed.

   We urge that all City major transportation projects in Ballard be placed on hold until this cumulative impact analysis is complete to ensure cohesive and thoughtful development and policy-making. Future infrastructure programs must be grounded in data-driven analysis to justify their necessity and effectiveness, unlike the Route 40 project, which the Ballard Alliance strongly believes lacks sufficient justification and community input to proceed at this time.

4. **Foster an "18-hour city" environment:** We support approaches to planning that would prioritize job and retail growth in Ballard over additional population growth, consistent with the character of an 18-hour city. Ballard's distinct retail character is essential to the neighborhood and must be preserved, including through zoning incentives.

5. **Support Ballard job growth:** Currently, the One Seattle Plan shows a roughly 3 to 1 ratio in the targeted net housing units to jobs projected for the future Ballard Regional Center. We encourage the City to adjust the housing to jobs ratio for the Ballard Regional Center. Additionally, as part of the subarea planning, the City should explore policies, programs, and incentives that will encourage more high-quality jobs to be created in or relocated to Ballard.

6. **Invest in public safety:** We advocate for a significant investment in public safety resources, including the establishment of a dedicated police precinct in Ballard. With Ballard poised to become a Regional Center, adequate utilities and infrastructure, including police and fire services, are imperative to support the anticipated growth and ensure the safety of our residents and businesses.

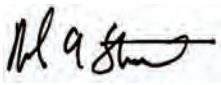
7. **Invest in livability:** We emphasize the need for increased green space and pedestrian amenities to enhance the livability and well-being of our community. These areas contribute to the physical and mental well-being of our residents, improve the environment, and complement active retail centers. As part of the Regional Center zoning standards, the City

should work with Ballard stakeholders to identify and adopt local zoning incentives and opportunities to encourage development of parks and open space with new construction.

24-1 cont

Again, we appreciate the City's attention to these considerations and look forward to continued collaboration in achieving our shared goals of vitality and sustainability in Ballard. We look forward to working with the Mayor and City Council to implement a vibrant future for our Ballard community.

Sincerely,



Mike Stewart
Executive Director
Ballard Alliance

cc: Council President Sara Nelson
Councilmember Dan Strauss
Councilmember Tanya Woo

Letter 25

From: Jay Lazerwitz
To: PCD_CompPlan_EIS; Hazelhoff, Aja
Subject: Roosevelt neighborhood Comp Plan Implications
Date: Tuesday, March 26, 2024 5:35:19 PM

CAUTION: External Email

As Chair of the Roosevelt Neighborhood Association (RNA) I am wondering what the implications of the Seattle Comp Plan will be in our area and adjacent neighborhoods?

How will the State Legislation HB1110 and the Comp plan affect the current single-family zoning within 1/4 mile of the light rail?

My understanding is that all properties zoned NR or RSL to be allowed 6 units on all residential lots located within a 1/4 mile of a major transit stop, and if not within 1/4 mile of a major transit stop can also have 6 units if at least two are affordable units.

What is the definition of a major transit stop? 25-1

Are there any other locations within or adjacent to the Roosevelt neighborhood besides the Light Rail station, that are considered major transit stops?

When the last zoning changes took place in 2019 in regard to the MHA program, the properties within the Ravenna-Cowen Historic District were excluded from zoning changes, going against the advocacy of the RNA. Will Historic District designation have any affect or consideration in the current Comp Plan proposal?

Are there any other issues that we should be aware of?

Thank you

Jay Lazerwitz
Chair, Roosevelt Neighborhood Association
206-335-8680

Letter 26

Thornton Creek Alliance
Post Office Box 25690
Seattle, Washington 98165-1190

May 6, 2024

Mr. Jim Holmes
City of Seattle Office of Planning and Community Development
PO Box 94788
Seattle, WA 981240-7088

RE: Thornton Creek Alliance Comments on the Draft One Seattle Plan and Draft EIS

Dear Mr. Holmes:

26-1

Thornton Creek Alliance (TCA) has been dedicated to restoring an ecological balance in the Thornton Creek watershed since 1993. Thornton Creek, the largest creek system in both Seattle and Shoreline, drains NE Seattle and SE Shoreline to its Lake Washington outfall at Seattle's Matthews Beach Park. Needless to say, we maintain a keen interest in planning and projects that impact the health of the watershed's ecosystems.

We appreciate the work that the City has completed to date. We realize it is a balancing act to meet the many City interests which need to be accommodated in the Plan. While the Plan and the SEPA DEIS evaluating the Plan are comprehensive, they fall short in several areas. Attached are our comments to help improve the Plan and DEIS and address those areas that require additional attention. We hope our comments will help ensure that Seattle grows in a sustainable, thoughtful manner.

We thank you for your consideration of these comments and those of the attached letters. We look forward to learning your responses, as well as collaborating to create a healthy city for all. Please add us to your distribution list for further updates and materials pertaining to the One Seattle Plan and its EIS.

Sincerely,

Sandy Gurkewitz,
Land Use Committee Co-chair

Ruth Williams,
President

THORNTON CREEK ALLIANCE (TCA), founded in 1993, is an all-volunteer, grassroots, nonprofit organization of 175 members from Shoreline and Seattle dedicated to preserving and restoring an ecological balance throughout the Thornton Creek watershed. Our goal is to benefit the watershed by encouraging individuals, neighborhoods, schools, groups, businesses, agencies, and government to work together in addressing the environmental restoration of the creek system including: water quality, stabilization of water flow, flood prevention, and habitat improvement through education, collaboration, and community involvement.

https://thorntoncreekalliance.info/
https://www.facebook.com/Thornton.Creek.Alliance

Thornton Creek Alliance
One Seattle Comp Plan DEIS Comments
May 2024

General Comments

- While the document includes much information and analysis, there are many areas of the DEIS where information and analyses are missing. Analyses of indirect and cumulative impacts are missing throughout the document. As a result, impacts are either underestimated or not identified making it impossible to fully compare alternatives. These studies need to be completed. Areas which we believe need additional information and analyses to evaluate impacts are listed in our comments on specific sections. **26-2**

- Similarly, mitigation measures are missing in many sections. We do not believe that mitigation by development regulation alone is adequate protection in most instances. We have concerns, for instance, about the effectiveness of allowing developers to pay into City funds for affordable housing and replacing tree canopy, as opposed to requiring them to actually include affordable housing in multifamily buildings, or to retain mature trees on lots and plan around them. **26-3**

- Regionally set growth targets include 80,000 homes and 158,000 jobs over the next 20 years. Why does the DEIS evaluate alternatives with greater housing needs of 100,000 and 120,000 while employment projections remain the same? An analysis or citation for the need for additional homes is missing. It is unclear where these additional numbers come from or why they are needed. Please explain (page 1-14). **26-4**

- A number of assumptions used in evaluating impacts appear to be speculative. For example: **26-5**

    - Where does the assumption that 15% of new jobs would be shifted to the location of new housing come from?

    - The DEIS assumes that replacing the existing canopy of older trees (particularly evergreens) with younger trees is equivalent. This is not true. The loss of function from tree removal and replacement has not been evaluated in the DEIS. Impacts from mature tree removal are underestimated. Loss of function from removal of mature trees would take decades to replace when planting seedlings or saplings to replace them. Benefits of mature trees include shading, cooling (these together benefit creek health, as well as benefitting the health of humans and wildlife by combatting heat island effects), wildlife habitat, carbon storage, and evapotranspiration (reduces flood risk). Mature trees also provide human psychological benefits. **26-6**

- While the DEIS cites numerous federal regulations, it is unclear how it will comply with them. The DEIS discussion and analyses are inadequate. **26-7**

    - Clean Water Act – How does the current City's Stormwater Municipal Permit address future development? Will discharge limits as well as flow control need to be modified to accommodate growth?

    - Endangered Species Act – How will increased flow and pollutant load to surface water bodies from new development impact threatened and endangered aquatic species and their habitat?

- Migratory Bird Treaty Act and Bald and Golden Eagle Protection Act – How will the destruction of large trees, habitat for migratory birds - as part of proposed new development - impact birds protected under this act? How will trees and other wildlife habitat be protected for eagles and their prey species? **26-7 cont**

- Regulation as mitigation is inadequate. In the case of tree protection, often required mitigation measures for tree retention are ignored during planning – and permits are issued that allow removal of heritage trees. Currently, penalties and fines are small and enforcement lax. While the City has the ability to condition permits through its SEPA substantive authority – it is unclear if with the proposed comp plan changes, the City be able to do so. **26-8**

- The growth concept presented in the One Seattle Plan and evaluated in the DEIS while mentioning meeting the objectives of the plan – prioritizes the built environmental (housing, jobs, transportation) over the natural environment. One of the key issues noted is to approve development regulations that result in quality urban design and integrating the best available science to protect critical areas (ECAs). This stance is not protective of existing urban canopy as much tree canopy resides on residential lots outside an ECA. The highest tree loss across Seattle, as reported in the City's 2021 Canopy Assessment, occurred in parks, natural areas, and neighborhood residential areas. **26-9**

Specific Comments

1. Earth and Water Quality (1.6.1 & 3.1)

- Numerous significant direct impacts were identified for surface water for all alternatives:

    - Increase in the amount of hard surface (buildings, parking lots) – and subsequent loss of vegetation – increases the way rainwater runoff mixes with potential pollutants and is transported.
    - Runoff Increases: Increases in runoff flow volumes and durations to streams by magnitudes resulting in bank scour and erosion.
    - Surface Water Quality: Increases in amount of pollution to receiving waters that would impair their designated uses (such as human contact and fish habitat).
    - Groundwater Quality: Impervious surface expansions that would decrease groundwater recharge beyond designated limits and increases in amount of pollution discharged to levels that would contaminate groundwater supplies. **26-10**

  Yet, every alternative is considered to provide beneficial indirect impacts to earth and water resources because 'focusing on growth in previously developed urban areas will result in less impact… than focusing the same growth in previously undeveloped areas outside of cities that add new impervious surfaces controlled under current standards.' It is unclear how this applies to Seattle because there are relatively few undeveloped areas outside of the City. Sister cities near Seattle are slated to grow by 64 to over 100 percent over the next 20 years. So, this statement isn't relevant anymore. Increasing water and earth impacts in Seattle does not reduce their impacts to surrounding areas. If anything, it increases them (2021 King County Urban Growth Capacity Report

June 2021, Ordinance 19369). Missing is an analysis of cumulative impacts from 20 years of growth on earth and water resources from the development of regional cities along with Seattle. Is it really better environmentally to increase density in already dense areas while increasing density in nearby communities? Additional study is needed to substantiate this assumption.

- Section 1.6.1 defines surface water quality only in terms of contaminant loading. It also must be evaluated for impacts regarding temperature, dissolved oxygen, sedimentation, bacterial loading (including fecal coliform), nutrients, and other factors that typically affect urban waters and human contact criteria therein.

- The planned extensive increase in impervious surfaces will increase runoff and stormwater. What measures will be taken to prevent flooding streets and buildings and the scouring of receiving creek beds? Mitigation measures are claimed to be addressed in Comprehensive Plan Policies (3.1-28), state, regional and federal regulations. However, without a cumulative impacts analysis it is impossible to know if maintaining the regulatory status quo is adequate.

- The DEIS states that each alternative could have increased impacts to water resources however, City code (ECA regulations, stormwater management, and building upgrades) can adequately avoid or minimize potential impacts to earth and water resources. Mitigation measures are claimed to be addressed in Comprehensive Plan Policies (3.1-28), state, regional and federal regulations. However, without a cumulative impacts analysis it is impossible to know if maintaining the regulatory status quo is adequate.

- Missing is an evaluation of the capacity for additional stormwater management in areas of the City that are already developed.

- Missing is an analysis or discussion of how or if the proposal will impact the City's Municipal Stormwater Permit. Will regulations be changed or strengthened to accommodate growth?

- Green infrastructure is a means for stormwater management. In addition, recent studies have shown that a mature canopy as part of a stormwater management program, is a major component of green infrastructure. Where in the DEIS is this mentioned or evaluated? Protection of the mature tree canopy should be included as mitigation for stormwater management. (Berlalnd, Shiflett, Shuster, Garmestani, Goddard, Herrmann & Hopton, 2017, National Library of Medicine. https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6134866/

26-10 cont

2. Air Quality & GHG Emissions (3.2)

- Operations – Transportation-related air quality emissions (Page 3.2-22) are predicted to decrease despite the expected moderate increase in Vehicle Miles Traveled for all alternatives – this is because the DEIS assumes that all alternatives are expected to generate lower air pollutant emissions than in 2018 because projected improvements in fuel economy outweigh the projected increase in VMT for criteria pollutants. This is speculation. Provide citations and any studies supporting this conclusion.

26-11

- Trees capture and store massive amounts of carbon, however all trees are not equal in their capacity to slow climate change. 'Large trees play an inordinately large role in removing carbon from the atmosphere and storing it in long-lived tissues (Figure 1; Lutz et al., 2012; Leverett et al., 2021). Globally, studies have found that about half the aboveground carbon is concentrated in a small proportion of large trees (1%–5% of total stems) (Lutz et al., 2018) - https://conbio.onlinelibrary.wiley.com/doi/full/10.1111/csp2.12944 - society for Conservation Biology, Mildrexier, Berberm, Law, Birdsey & Moomaw, April 22, 2023).
Missing is an evaluation of impacts from vegetation removal (particularly from removal of large mature trees which function differently than newly planted trees).

- Page 3.2-46- Mitigation. Incorporated Plan Features – How will the updated City Comprehensive Plan policies for land use, transportation and others provide an opportunity to increase residential compatibility in proximity to major air emission sources? What does this mean? What is the timing of this proposed mitigation?

- Page 3.2-47 – Greenhouse Gases & Climate Change – Add retention of large trees as mitigation for Greenhouse Gases

- Page 3.2-50 – Improved Air Filtration and mitigation – There is no section in the plan that discusses this. Please provide a reference.

- Mitigation referenced in the Plan? Where? Show us.

- Missing is an analysis and discussion of the preservation of mature trees as mitigation for climate change.

- Significant Unavoidable Adverse Impacts (page 3.2-51) – No cumulative impacts or indirect impacts analysis has been completed for air quality or GHG emissions for any alternative. The DEIS is incomplete/inadequate.

- Missing is an evaluation of heat islands and wind tunnels – a certain impact from adding impervious surface. Therefore, this section underestimates the impacts of additional development proposed in the plan. Also, it's hard to pretend to be working against climate change while encouraging rampant demolition of useful homes and new construction with all new materials. The associated GHG output is enormous.

- The alternative in the Draft One Seattle Plan (Alt 5) has the highest impact on Expected Pollution and Runoff Increases (Exhibit 1.6-1] of all the alternatives. Note it was also reported to have the largest pollution indicator for daily single-occupancy vehicle trips as well. Why has this alternative been included in the Draft One Seattle Plan?

26-11 cont

3. Plants and Animals (3.3)

- This section of the DEIS states that it evaluates impacts to plants or animals and whether they would reduce the likelihood of survival or recovery of a plant or animal species in the wild as compared to the No Action alternative. This is not a credible measure of impacts to animals or plants. The threshold of and criteria for significance in the DEIS do not meet the SEPA definition of significance as described in WAC 197-11-794, and the evaluation does not measure 'the severity of an impact weighed along with the likelihood of its occurrence. An impact may be significant if its chance of occurrence is not great, but the resulting environmental impact would be severe if it occurred'.

- All alternatives will impact plants and animals through habitat destruction. It is unclear which species will be impacted because there is no analysis. Which species are present, which will be impacted? How will survival or recovery be measured? Are there differences in different analysis zones? Differences by alternatives? **26-12**

  Also, it is unclear how this measure is consistent with requirements of the Migratory Bird Treaty Act and the Bald and Golden Eagle Protection Act which protect numerous species. This does not measure potential taking, killing, possession of migratory birds or eagles or any parts, nests, or eggs of such birds.

- Missing is basic information that would be included in a lesser threshold determination of Determination of Non-significance (DNS), and the SEPA checklist is missing. Where is the list of birds and other animals observed on or near the site or known to be near the site? Where is the list of threatened and endangered species known to be on or near the site and where is their critical habitat shown? Many parts of the City are part of migration route for fish and birds - this is not included in the DEIS. Mitigation measures to preserve or enhance wildlife are not included. A list of invasive animal or plant species is not included. https://ecology.wa.gov/regulations-permits/sepa/environmental-review/sepa-guidance/sepa-checklist-guidance/sepa-checklist-section-b-environmental-elements/environmental-elements-5-animals

- p. 3.3-3: "The only ESA-listed or state-listed species known or expected to use habitats in the city are fish (steelhead and Chinook salmon)." (Note they are both listed under the ESA as threatened.) The statement is true, but the loss of these species is part of a broad downward trend in several salmonid populations up and down the west coast of the US. Moreover, and very importantly, Chinook salmon are a major part of the diet of endangered southern-resident killer whales, which use Puget Sound. So, the general loss of Chinook from City waterways has had an adverse impact on those orcas and their critical habitat.

- The evaluation criteria make no sense and are inconsistent with other evaluations completed by the City. Why didn't the DEIS use the same methodology for evaluating impacts on plants and animals as the Seattle Maritime Lands FEIS - another non project action EIS - that has been incorporated by reference? The One Seattle Plan will have a much greater impact on the City than the Maritime Lands Plan. Therefore, the One Seattle Plan DEIS should be at least as robust and include the following (excerpted from the Maritime Lands Plan FEIS): **26-13**

  > Page 3-116 Data & Methods: "To characterize plants and animals for each alternative, the project team reviewed GIS data for the primary and secondary study areas identified for each alternative.

Data sources included aerial imagery, national wetlands inventory, the City's GIS data for environmentally critical areas (wetlands, streams, wildlife habitats and riparian corridors) and the Washington Department of Fish and Wildlife's Priority Habitats and Species (PHS) information, as well as existing reports."

This review is a general summary for the purposes of identifying plants and animals that could be affected by implementation of the program. As with most construction projects conducted in the city, projects proposed under the program would require site-specific analysis to determine the presence of sensitive or protected plants, habitats, fish, or wildlife.

Exhibit 3.4-4 Plants and Animals were identified - need to complete a study at least to this level. Include an Exhibit such as 3.4-4 Identifying Special Status Species and Habitat occurring in the Study Areas. In addition to stormwater runoff and species displacement - noise impacts were evaluated. Where is that analysis in the One Seattle DEIS? **26-13 cont**

Page 3-113 The study area is highly urbanized, but still provides habitat for numerous plant and animal species. Many of these are nonnative introduced species, and most of them are well-adapted to the urban environment and high levels of human disturbance.

Thresholds of significance used for this impact analysis include:

- The potential to reduce or damage rare, uncommon, unique, or exceptional benthic, marine, wetland, riparian, or fish and wildlife habitat.
- The potential to harass, harm, wound or kill any species listed as federally threatened or endangered.
- The potential to adversely affect critical habitat for any federally threatened or endangered species.
- The potential to block migration corridors for special status species.
- Terrestrial noise levels generated exceed any established injury thresholds for any special-status species.

Mitigation measures in the Maritime Land FEIS include - evaluating projects on a case-by-case basis. This should be obvious, but it is missing from the One Seattle Plan DEIS. Please identify where this mitigation measures are called out.

- Each alternative will result in a loss of tree canopy. What is and how will 'A substantial increase in potential for tree canopy cover loss' be measured? Missing is an analysis of the loss of the function of large, older trees in reference to the function of newly planted trees. **26-14**

- This section of the DEIS is inconsistent with City SEPA policy SMC 25.05.675 N Plants and Animals which sets a high priority on minimizing or preventing the loss of wildlife habitat and other vegetation: **26-15**

  It is the City's policy to minimize or prevent the loss of wildlife habitat and other vegetation which have substantial aesthetic, educational, ecological, and/or economic value. A high

priority shall be given to the preservation and protection of special habitat types. Special habitat types include, but are not limited to, wetlands and associated areas (such as upland nesting areas), and spawning, feeding, or nesting sites. A high priority shall also be given to meeting the needs of state and federal threatened, endangered, and sensitive species of both plants and animals.

- How does the SEPA mitigation policy per SMC 25.05.675N apply with proposed land use changes in the One Seattle Plan? Will these be modified? "

  For projects that are proposed within an identified plant or wildlife habitat or travelway, the decisionmaker shall assess the extent of adverse impacts and the need for mitigation.

  d. Mitigating measures may include but are not limited to:

  1)Relocation of the project on the site;

  2)Reducing the size or scale of the project;

  3)Preservation of specific on-site habitats, such as trees or vegetated areas;

  4)Limitations on the uses allowed on the site;

  5)Limitations on times of operation during periods significant to the affected species (e.g., spawning season or mating season); and

  6)Landscaping and/or retention of existing vegetation.

26-15 cont

- Tree canopy and vegetative cover on individual lots provide wildlife connections throughout the City. The DEIS (Page 3.3) concludes that "At the scale of an individual parcel, as the proportion of a lot that is occupied by buildings and impervious surfaces increases, the amount of vegetative cover—and, by extension, the lot's capacity to help support diverse and abundant communities of plants and animals—typically decreases**."**

  Missing is information on urban wildlife corridors. Private vegetated lots provide wildlife corridors. They will be lost during implementation of the One Seattle Plan. Riparian corridors like Thornton Creek are perfect for enhancing such corridors. An analysis of the impacts of canopy and vegetation cover removal on wildlife connections is needed to understand the impacts of all alternatives, particularly on migratory birds. https://changingnatureproject.weebly.com/green-links.html https://realgardensgrownatives.com/?p=4998 https://www.smartcitiesdive.com/ex/sustainablecitiescollective/corridor-ecology-and-planning/18365/

26-16

- "Broadly speaking, the areas with the greatest proportion of tree canopy cover are in and near parks and natural areas, particularly those near the shorelines of Lake Washington and Puget Sound (**Exhibit 3.3-2**). Forested areas are also present in ravines and along the steep slopes of the city's major hills, such as Magnolia, Queen Anne Hill, Beacon Hill, Boeing Hill, and West Seattle. Tree

canopy is largely absent from Downtown and major industrial areas along the Duwamish Waterway and in Interbay. Figure 3.3-2 doesn't show this. Need additional information, e.g.,labels on exhibit.

- "Tree Canopy Cover, Page 3.3-7 – Of the approximately 35 acres (14% of 256 acres) of canopy loss that occurred on parcels that underwent development, almost all (31 acres) happened on parcels in the Neighborhood Residential or Multifamily management units. In 2023 (i.e., after the tree canopy study was completed), the city's tree ordinance was updated (see Section 3.3.3). It is anticipated that these updates will decrease the rate of canopy loss associated with residential and commercial development."

  This is an erroneous conclusion. How will the City's tree ordinance decrease this rate? FAR will be reduced. The only regulations seem to apply are in ECAs and even there – the exemptions may rule. TCA can provide pictures of what lots look like when undergoing development. They are scraped clean of everything green and look more like a battlefield.

- Contaminated stormwater impacts other species. They drink the water too and eat contaminated fish. Has an analysis of degraded water on urban wildlife been completed? What is the overall Impact on wildlife?

26-16 cont

Other Comments

- P 3-3-29-30 Please analyze the potential impact of the 5 options on Seattle plants and animals. This is a Seattle EIS, not a regional or state EIS. Saying "unlikely to result in appreciable impacts on regional populations of plants or animals'" and "none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild" is avoiding commenting on the specific impacts on Seattle plants and animals.

- p 3-3-30 Saying that "none of the action alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." is not backed up by facts, but speculative at best. The new tree protection ordinance actually increases the potential for tree removal in several ways. One is that all the developmental areas covered by the ordinance state that the newly defined "basic tree protection area cannot be modified" despite Portland, Oregon and the Northwest Society of Arboriculture saying it can be modified to save trees. This and current lot coverage of 85 - 100% for multifamily lots and above and rezoning to occur mean more trees, especially large ones, will be removed. What is your estimation of potential canopy acreage loss (over 5-year periods consistent with the city's canopy studies) with increased development density in each alternative?
- What is your estimation of planting needs and time frame to replace the lost canopy (over 5 year periods tracked by the city's canopy study)?
- Is canopy replacement equivalence even possible with replanting since removed trees, if not removed, would have continued growing according to scientific articles?

26-17

What is the acreage available and suitable for planting trees in each of the following public areas- the city's Rights of Way, Natural Areas and Developed Parks?

- How many trees and what size will need to be planted in these areas every year to make up for trees and canopy removed during development on housing lots?
- What is the available acreage available to plant trees on private property?
- When will it be possible to reach the 30% citywide goal?
- What potential is there for more than 30% tree canopy in Seattle over time?
- Is up to 40% canopy coverage, over time, as proposed in the previous Comprehensive Plan possible?

26-17 cont

What is the projected loss in canopy volume over the next 20 years as big conifer trees are removed?

- Canopy volume, especially of coniferous trees during our rainy season, is a critical factor in reducing stormwater runoff.
- What is the projected increase in stormwater runoff and what costs are associated with on site and alternative city water management policies of stormwater and pollutant runoff as a result?

As to other tree potential mitigation measures, add:

- Amend the Tree Protection Ordinance to require developers to maximize the retention of existing trees 6" DSH and larger.
- Give SDCI Director the ability to ask for alternative site designs to save trees.
- Support building higher and building attached units to allow for tree retention and planting areas as Portland, Oregon has done with 20% areas for multifamily and 40% for its 1-4 unit family zone.
- Amend Tree Protection Ordinance to require the ordinance to apply to all city land use zones.
- Remove the "basic tree protection area" loophole in the Tree Protection Ordinance that allows developers to unnecessarily remove almost all large trees on lots.

Laurelhurst Community Club

Serving Seattle's Laurelhurst Community since 1920

May 5, 2024

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cc. Michael Hubner, Councilmember Maritza Rivera and Mayor Bruce Harrel

From: Laurelhurst Community Club

RE: One Seattle Comprehensive Plan 2040 Comments

Dear Mr. Holmes and the Seattle Office of Planning and Community Development:

The great cities of both the US and the World have experienced many of the same challenges in planning for future growth. The DRAFT One Seattle Plan document is lengthy but provides a good workable framework for the City to set goals and enact the policies to achieve them over the next 10-year planning cycle.

The Laurelhurst Community Club Council (LCC) represents over 5,000 residents and small businesses in north Seattle, and has examined the One Seattle draft, attended the OPCD outreach meetings and shared input from many non-profit organizations.

LCC has also studied how other large cities in a growth trajectory plan to supply housing units for a range of incomes amidst their housing stock of high cost of market rate homes. Solutions vary from New York City, Vienna, Singapore and Hong Kong in building maximum units on government owned land and/buildings, partnering with private developers to build affordable units within the city (Seattle's primary model), offering federal, State and local tax cut exemptions to build more affordable units and building efficient, low cost transportation systems to enable their City's work force to live outside city limits at a lower cost of land and housing. 27-1

In keeping with One Seattle's goals, the best example of transparency for planning and inclusion processes is the City-State of Singapore which does is publicly with a 3-D display of an updated master plan model of the entire city. As it updates development and planning, it delineates its old and new neighborhoods, location of subsidized units, and plans for "reclamation" of new land owned by the government added to its shores. ***How can Seattle's OPCD become a more open planning process to all?***

The One Seattle Comprehensive Plan contains noble goals and policies for the next 10+ years. ***However, many of them are very general and should be based upon the***

effectiveness of the positive outcomes of policies of the past 15 years, as well as identify the unintended consequences, and better addressing emerging trends.

Our comments below are focused on: General Goals, Growth Strategy, Land Use, Housing, Transportation, Climate and Environment, Parks and Open Space, Arts and Culture and Community Involvement: 27-1 cont

Growth Strategy

The GS G1 Goal of creating complete communities for the inclusive needs of all ages and abilities is the overarching One Seattle Comprehensive Plan.

GS 1.2 Encourages a variety of housing types is lofty to be inclusive and age-in-place but is not specific. *Has a real estate tax cap for seniors been studied to help predict and manage elders' tax bills so they can truly age in place?*

GS 1.3 Accommodate non-residential uses in neighborhoods seems counter-productive to building housing stock when many office and commercial buildings sit empty**.** *How would this policy prioritize and preserve housing units?*

LCC agrees with building density along existing transit routes, avoiding ECA areas and better planning for transportation, parks and recreation for new planned density areas.

The 2015 Comp Plan was deficient in requiring adequate infrastructure support for density. How does One Seattle plan to finance the needed new infrastructure?

The U District area including the University Village now has over 4,000 new residents and receive almost no City amenity funds, the developments ***and actually closed NE 41st St community center*** nearest b*ecause it did not meet a body mass and racial profile.* ***How can the City meet the increased facility needs with its plans for adding 100,000 more residents?*** 27-2

LCC supports GS 1.4 and GS 1.9 which calls for the City policy to match dense housing in Regional and Urban centers with MORE public amenities.

LCC supports GS G2 Seattle's development pattern that results in a range of vibrant places that all play a role in housing and jobs.

LCC supports GS 2.1 Use the FLUM to guide land use regulation (adding no exceptions)

GS 2.2 Require FLUM amendments only intended to change the intended function.

How can FLUM amendments be prohibited from piecemeal projects by developers looking for exceptions and departures that cause the overarching plan to disintegrate?

LCC agrees with the description of the place types (page 19, figure 1). Renaming Urban Centers that serve the NW Region and State should be Regional Centers.

Urban Centers utilized by County and City residents and employees fit the new name. LCC strongly supports more Regional and Urban Centers proposed at Northgate and 130th adjacent to the new Light Rail stations and for future ones in West Seattle Junction and adjacent to Light Rail stations through the Rainier Valley. *Should Aurora Ave be a*

designated Urban Center with a Master Plan for dense housing with commercial and support service amenities e.g grocery stores and pharmacies, that also retains its light industrial and commercial small businesses?

LCC supports GS 4.3 allowing a wide range of housing types, and again would like to add**:** ***GS 4.6 Do Urban Centers require retaining or anchoring essential large grocers and a child care facility in these zones to make walkable neighborhoods'?***

Neighborhood Centers (figure 7) would be a new zoning type option to add density and comply with State bill HB 1110 which requires "middle housing" type options with 4-6 units within 1/2-mile walking distance of a major transit center.

GS 5.1 "designate Neighborhood Centers with a commercial core, diverse housing options within walking distance to shops, services and transit". LCC agrees that this best complies with HB 1110. **27-2 cont**

GS5.2 Allow all types of diverse housing types and services. LCC disagrees that it should be centered on *institutional* services. Larger-scale services should be in Urban Centers.

GS 5.3-Zoning heights 3-6 stories. ***Why are 5-6 stories the goal for Neighborhood Centers, which double the existing height limits? LCC suggests heights should be 2-4 stories maximum as suggested in HB 1110 to conform to existing heights. These denser units that would better transition to existing while doubling housing units.***

Add: GS 5.6 Why isn't there an OPCD and/or SDCI code change that Neighborhood Centers require a "Master Plan" to ensure context sensitive scale and aesthetic compatibility to adjacent existing buildings, especially residences?

Urban Neighborhoods- Seattle's neighborhoods are the heart of the City. People ask "what's your neighborhood" to start a fun conversation, and they support community building throughout the City.

GS 6.1 Designate Urban Neighborhoods primarily for residential development. LCC agrees that some areas need to be designated as quiet places to rest and enjoy, away from the noise and traffic in urban cities.

GS 6.2 Allow 4-6 stories near frequent transit. LCC disagrees and that is covered in all of the other zones, especially in Neighborhood Centers. ***Building 4-6 stories is out-of-scale and lacks the adequate infrastructure to build heavy density in this low density area. HB 1110 requires building more units in existing zoning to add "Middle housing" and does not call for adding heights or changing setbacks in those zones and better transitions at its edges.***

Major Institutions

LCC agrees with using the Major Institutions GS 8 Master Plan processes for managing their growth and uses that are needed within those boundaries as approved.

Parks and Open Space

Because the Park and open Space lands are not expanding with the rapid population growth.

GS 9.3 “Allow housing in the parks and open space ...only where it is located within a community center or pool”. ***What statute in the City codes allow Seattle to change parklands to housing? LCC rejects this hijacking public open spaces and converting it to private residences, even if City owned. It is not compatible and removes limited public space when housing can be built elsewhere.***

GS 9.4 Allow limited commercial use to activate existing buildings. LCC supports this as operating some recreational uses require expertise from commercial operators.

Area Planning

GS G10 .4 and GS 10.8 “Prioritize City resources for area planning for Regional and Urban Centers with a higher risk of displacement***” What policies in the City’s Land Use code provide long-term housing displacement for vulnerable elders, handicapped and low income residents? LCC agrees to protect existing residents from displacement whose housing costs could be now affordable, but later is too expensive.***

27-2 cont

Annexation

GS G11 “Seattle has established a process for potential annexation of three areas”.

GS 11.1 “Designate unincorporated land for potential annexation where it can be easily connected to City services”. ***LCC agrees*** but cautions that any new annexation should be in similar condition to the levels of Seattle so that annexation does not cause an excess outflow of resources from the City of Seattle.

Add: GS 11.2 ***Is permanent affordable prioritized when creating “new land” from potential“lids” over transportation corridors?*** *Singapore does with proportionally when “reclaimed” land is developed from the sea.*

Land Use

LCC agrees with the statement that new zoning and development regulations intended to produce one result can *also have unintended consequences*, and in particular, displacement of existing residents and small businesses who can be “priced out” of existing locations that they call home.

LCC supports the lofty goals in LU G1, specifically ***“create housing that works for various income levels, “encourage high quality, well designed and sustainable buildings, protect and enhance the natural environment and mitigate impacts of new construction.***

27-3

These are similar to the lofty goals of the 2015 Comp Plan but policies were rarely enforced resulting in rapid infill and increased zoning “departures” from the planned Comp Plan and MHA policies. Many of those projects failed the “quality, sustainability enhancement of the natural environment and mitigating impacts of new construction”.

How will projects be considered "high quality' if SEPA and Design Review are not part of the regulatory process?

Many MHA titled housing units were built with no context to existing structures and zoning, displaced existing residents and small businesses, destroyed existing trees. Developers just wrote a check "in-lieu" into the affordable housing fund to build units far away from existing locations. "Stick trees" were planted onto right of ways and many died which deteriorated the City's tree canopy. How can Seattle prevent these unintended outcomes and ensure "stewardship" practices for the replacement trees viability?

27-3 cont

The 2021 City of Seattle Tree Canopy Assessment (page 37) chart noted that in ***"Citywide redeveloped parcels", there was a loss of -39.8% in tree canopy****, (and only a -1.4% in undeveloped parcels) which resulted in 33% of the City's declining tree canopy of 1.7% from 2016-2021***. Which City policies in One Seattle will ''protect and enhance the natural environment ''?** *How will SDCI define "high quality' standards and mitigation goals?*

LCC supports:

LU 1.2 Neighborhood business variety nearer to residents

LU 1.3 Apply development standards to protect public health and safety **(NO WAIVING Design review)**

LU1.5 Balance development standards vs **preventing displacement.**

LU1.6 Develop residences **away from air pollutants.**

LU 1.7 **Protect displacement** in legislative re-zone policies, especially low income and marginalized populations.

LCC has concerns about LU1.1 "a wide variety of housing types in all neighborhoods". The infrastructure in the City was not built for all densities (eg width of streets, sewer)
This was also mentioned as a concern in HB. 1110

Urban Design

LCC strongly supports the goals and policies of the natural environment:

LU G2" Seattle's unique character and sense of place, etc and the policies that recognize the importance of retaining Seattle's native vegetation, waterways, forests and visual public views of Mt Rainier, the Olympic Mountains and the Cascade Range, as well as lakes, waterways and public shoreline access points.

What new regulatory land use codes will protect public view corridors as developers try to "outview the next one?

And LCC supports polices :LU2.1, LU2.2, LU2.3, LU 2.4, LU2.5. LU 2.6, LU 2.7, LU 2.8.

Built Environnement

*LCC strongly supports***:**

LU 2.9 Encourage preservation of characteristics and features that contribute to communities' multiple identities including areas of historic, architectural, cultural and social significance.

LU 2.10 creating walkable cultural scapes

LU 2.12 Will the City SDOT have designated ownership and operating plans to develop highway lids and other pathways to reunite neighborhoods?

27-3 cont

LU 2.13 and LU 2 .14 Design walkable connections and add natural lighting and rain protection.

LU 2.15 Rooftop production of fresh food is a terrific way to provide local food sources.

LU2.19. Plan to cascade heights to allow for more lower-to-higher views of water and mountains. This is a much better approach than SDCI continuing to allow view blocking with the newest buildings in the 2015 Com Plan.

LU 2.20 Prioritize not allowing negative impacts of tall buildings to block sun and views in public parks and spaces

LCC does not support:

LU 2 16-18. Clustering of tall buildings, which can create *"built mountains"* and block public views. *Which regulatory land use codes and agency define what is a good cluster of tall buildings?*

Public Spaces

LCC supports LU 2.21- LU 2.24 that encourages public spaces designed for a range of users.

USES Goal: LU G3 Allows every use everywhere

Will the City require Master Plans for allowing a variety of uses and some defined use areas to prevent the "Aurora Ave "lack of character and confusing zoning mess?

LCC does not support policies LU 3.1, 3.3, 3.4, and 3.6 but supports 3.5 retaining existing nonconforming use.

General Development standards

LU G4 Development standards that match each zone's function, protect health and safety and add housing and commercial spaces.

LCC Supports these policies:

LU 4.2-Standards that provide predictability for each zoned

LU 4.3 -Control of massing for compatibility for planned scale and provide open space

LU 4.7 Use setbacks to allow for light air and sunlight

LU 4.8 Use tree preservation requirements to enhance aesthetics, prevent heat islands

LU 4.9-LU 4.14

LU 4.*15 LCC supports protecting the public views through setbacks and establishing zoning blocks that protects key City views.*

LU 4.17 *LCC supports Seismic retrofitting to minimize health risks and retain historic buildings.*

LU 4.18 Can OneSeattle reinstate the use of Design Review to enhance the quality of City development by applying these best practices to "Middle Housing" and to "Affordable Housing" to minimize the stigma of "cheap housing" among its residents?

27-3 cont

LU 4.4 and 4.5 – allowing use of maximum heights in the name of limiting *view blockage How does this curb more view blocking throughout the city scape?*

LU 4.16 -*Why are higher heights required when current regulatory codes already provide land use code exceptions to preserve land marks?* Requirement for higher density to preserve landmarks-too broad and not necessarily commensurate with designating a landmark.

Off Street Parking

LU G5 to *plan for alternative transportation modes*

The reality check is that an estimated 80% of Seattle's residents own a car which is the second highest urban car owners in the US. While there has been a small decrease in car ownership as the City becomes more renters than home owners, the OneSeattle must plan for their existence, especially for attracting families..

LCC supports LU 5 5.4, LU 5.5, LU5.6, LU5.7, LU5.8, LU 5.9, and LU 5.11 (for bikes)

LCC has concerns on the LU 5.1, LU 5.2 and LU 5.3 which set limits on parking. Has the City 's traffic improved due to fewer cars owned? The free-market system will best sort it out and since it expensive to build, developers *will find the number of spaces to meet the needs of the residents of its housing and commercial users.*

Public Facilities and Small Institutions

LCC supports LU G6 that public facilities and small institutions must grow to meet the needs of the population if their "mission is compatible with the function and scale of the surrounding area".

LCC supports LU 6.1 through 6.4

LU 6.5 What is the process for siting essential public facilities and a policy needs to be made in One Seattle as 6.5 is too general?

Telecommunications Facilities

LCC supports LU G7 that allows telecommunication utilities but also requires that they be vetted for public health issues.

LCC supports LU G 7.1- LU 7.5 -restrictions on the location size, mitigation of visual, noise and proximity to communities, and prohibiting locating them in residential zones.

Downtown Zones

LCC supports LU G8 **t**o promote downtown Seattle as its densest neighborhood promoting vitality, tourism and arts and entertainment.

LCC supports all policies e.g. LU 8.4 to encourage a vital 24/7 environment.

27-3 cont

Seattle Mixed Zones

LCC supports LU. G9 *How will the policies of LU 9.1 and LU 9.2 promote density in mixed use zones outside of the downtown core?*

Multifamily Zones

LCC supports *LU G 10 multifamily zones to provide a variety of scale of household with a mix of incomes and support local walkable neighborhoods where they are located*.

LCC supports LU 10.1 through 10.6, especially requiring "*high quality housing* and development standards that promote livability and a sense of community, including landscaping and amenities.". This approach will enable Multifamily zones to be desirable and affordable in forming new desirable neighborhoods of the future.

Commercial Zones

LCC supports LU G 11 -the creation of Commercial zones that support surrounding neighborhoods and encourage long term stable businesses. Robust businesses serve both residents and employees and add to the vibrancy and into the City's tax coffers.

LU 11.1 In the statement "range of commercial zones". *What is in the range of commercial activities? More clarity is needed to prevent incompatible development.*

LU11.4 Assigns outright height limits to commercial but then allows different height limits within the zone. **Are these lower height limits for transitions to existing 2-3 stories or does it mean grant higher height limits of 4-6 stories?**

LU 11.2, and 11.5 state "compatible blend" of housing and commercial and suggest Neighborhood commercial limits on size and heights but **does not require the necessary commercial anchor of a grocer with access to fresh produce and protein. How can access to fresh food be incentivized in OneSeattle?** *Over the past 10 years, NE Seattle has lost two QCF grocery stores (Roosevelt and Wedgwood), and a major Safeway on NE 45th Street while density in residential units exceeded 10,000 more residents with at least 4,000 more units awaiting permits at SDCI. Neighborhood Commercial should only occur where a significant food outlet is a key component because residents cannot live on coffee alone. Requiring a type of Master Plan for these new Neighborhood Centers would help to guide a balanced result in services.*

Neighborhood Residential Zones

LU G 12 LCC *agrees with this goal* to have places in the City for residential zones, which contain various housing options and accommodate a variety of households and income.

LU 12.1, and LU 12.2

LU 12.5 height limits of LR 2 -LR3 to this policy and require to be within 1/2 mile of frequent transit service.)

27-3 cont

LU 12.3 -*LCC mostly supports these uses.* ***How does SDCI prevent and monitor adverse impacts from small institutions and at-home businesses*** *to* ***protect the livability of residential zones and avoid unintended consequences?*** Dense residential areas should be primarily a refuge from loud City noise and traffic and must be the primary goal.

LU12.4 **LCC opposes this vague ‘‘development capacity allowance**” as it can create out-of-scale buildings with simply adding 4 units of somewhat affordable housing into a general affordable housing pool but leaves negative impacts from excess heights that change the entire character, sunlight and natural public views on existing residences who are compliant with the zone heights.

Industrial Zones

LU G13.1-LU G13.*3* *LCC supports all of the goals* and policies (LU 13.1-LU 13 .39) in the Industrial zoning section, and especially agrees with LU 13.29 and LU 13.30 which **requires buffer zones and compatible scale along its edges,** particularly to neighborhoods.

LU 13.35 ***How will new building heights should be limited to “protect distinct natural water views, shoreline areas and nearby neighborhoods?”***

Local Specific Regulations

LU G 14 Local regulations supporting unique conditions. *LCC agrees* with this goal to preserve the City’s character and support special areas of interest and special needs.

LU 14.2 and LU 14.3 Can implementation of the Master Plan process help create a variety of residential and commercial development that “use a cohesive urban design and promote high levels of environmental sustainability, housing affordability and publicly available open space”?

This approach is far superior to many of the piecemeal apartment projects that were surgically inserted into NE Seattle, on Union Bay and NE Blakeley streets. The “residential density” result is a row of cluttered market price housing units, with dumping cars on the two small side streets with no City safe and continuous sidewalks and no crosswalks for pedestrians. A “Master Plan” would have resulted in a less cluttered and poor-quality aesthetic, required developers to pay in for transportation impacts and perhaps provided better car storage, delivery truck access.

Major Institutions

LU G15 LCC agrees that the Major Institutions are regionally important, but *they must be regulated to avoid traffic, displacement and housing shortage impacts.*

LCC *agrees with the policies LU 15.1- LU 15.10 which* are the using the tools of the Major Institution Master Plans and Major Institution Overlays. The City of Seattle is a nexus of health care and education and its needs will grow as the surrounding populations grow.

LU 15.3 LCC supports "Balance the need for the major institution to grow with the need to maintain the livability and vitality of neighboring areas". LU 156 " Locate major institutions where their activities are compatible with the surrounding land uses.. and where impacts associated with future development can be appropriately mitigated".

27-3 cont

LU 15.10 addresses housing units***. LCC supports these recommendations not to allow any housing on, or nearby the institutions to be torn down and re-used for non-residential purposes***. The City allowed Seattle Childrens Hospital to demolish 136 units Laurelon Terrace garden condominiums with affordable rents, but allowed SCH to replace the family units with dorm room style units in the U District which went up to market price and alter divided into single room rentals and displaced families.

In assesshe Major Institutions' Master plans, will SDCI :Require the Major Institution to include an inventory of their space used in their facilities by hours used?. The goal is to first identify surplus spaces already underutilized for every institution instead of continuing to add more buildings.

Require Major Institutions to identify capacity for expansion in their satellite **locations?** With enhanced technology, and virtual tools they could expand capacity using other locations linked to a main campus or medical center effectively and economically.

Require Major Institutions to declare all of their facilities (research, housing, offices, billing, etc) inside or outside their Master Plan and quantify their total Seattle footprint as part of the Master Plan process?

Acknowledging that many Major Institutions are tax exempt, has the City considered imposing fees to support infrastructure or operational services provided to them?

Historic Preservation and Cultural Resources

LU G 16 ***LCC supports the City's goals to preserve its historic and cultural resources*** and encourages adaptive use of its buildings and sites. The landmarks in Seattle tell the story (good and not-so good) of Seattle's colorful history. *Cultural resources in conjunction with the City's First Nations history are the rudder guiding all people today how to live in balance with the City's natural surroundings.*

Policies LU 16.1- LU 16.18 are all *supported by LCC* with special emphasis on using outreach to educate all citizens about the preservation processes and why they add value to the city's livability. .

As the City grows in landmarks to preserve, how has it allocated adequate resources to adequately manage the current landmarked properties and future designations needing resources to approve any modifications? Volunteers on these technical boards should have access to independent experts in historic architecture.

LCC *supports LU 16.18* but would also add more incentives:
For expensive landmarked buildings seismic retrofits, the ***City should grant owners of a real estate tax credit or deferral to protect these vulnerable assets form earthquakes.***

LU 16.19 ***How have the US Department of the Interiors' Standards for the Rehabilitation of Historic Properties been applied by the City to ensure that meet the guidelines for the Seattle Landmark Preservation Board's approval decisions for any major changes or demolition of any landmarked buildings or sites?***

27-3 cont

Environmentally Critical Areas

LU G17 *LCC agrees* that environmentally critical areas need regulations to protect the ecological functions, wetlands and fish and wildlife conservation.

LCC supports most of the policies of LU 17.1-LU 17.17 with emphasis on LU 17.8, LU 17.9 and LU 17.9 requiring new development in liquefaction and peat settlement areas to be designed to limit damage during earthquake and the construction processes.

LCC *supports* LU 17 .12-14 Wetland protection with no net loss to protect fish and wildlife habitat.

LCC ***supports fish and wildlife regulations*** in LU 17.15 as well as LU 17.16

How does One Seattle incentivize the daylighting of streams that are now in pipes? Specifically, Yesler Creek has been buried under the Battelle site in NE Seattle and it should be required to be daylighted with any new development on the landmarked site.

LU 17.18 Abandoned landfills. ***Does SDCI prohibit development within 1000 feet of an abandoned landfill?*** The Laurelhurst neighborhood borders such a landfill and has strong concerns *about the proposed dense development within 1000* feet and its impact on the existing residential areas that border the landfill.

TRANSPORTATION

T G.1 "Transportation decisions, strategies and investments support the growth strategy for the City and the Region". LCC agrees with this goal. The 2015 Comp Plan expected Light Rail to be developed more quickly and expansively than it delivered. In 2 years Light Rail will finally connect to major employment locations on the Eastside and later to other Seattle outer neighborhoods.

27-4

T 1.1 through T 1.4. LCC supports these policies which prescribe planning now for regional connectivity considering the long planning and execution timeline.

T 1.1 ***Do transit facilities need to include public restroom access as travel times are lengthened by new service routes. In addition? Is Transit security planned and funded to make these regional systems safe to ride at all hours?***

TG 2 Street use including right-of -way use for community***. LCC opposes dedicating the ever-dieting Seattle streets for "inviting spaces for community" within the right of way. LCC has concerns that pedestrian safety is endangered with cars, and not safe. LCC has concerns that users will be exposed to vehicular emissions. Who decides which***

City streets are "closed" and causes confusion and resentment of entitlement among neighbors?

T 2.3 , T 2.7 ,T 2 .8 and T 2.9 LCC agrees that the City needs to plan for emerging delivery devices as residents often get 1-3 various types of food, and Amazon/UPS packages delivered daily. Freight mobility is critical to commercial use throughout the City

27-4 cont

T 2 .11 Resolving conflicts with using right-of -way spaces. LCC agrees that some street frontage space needs to be dedicated for shorter duration use and use off street parking and transit layovers.

T 2.13 and T2 14 LCC supports enhancing boulevards and alleys for all transportation modes, and alleys may be utilized for public space is not heavily trafficked.

T 2 15 and T2 .17 LCC supports creating public space (if large enough) in right of ways for children and non-motorized egress (bikers, skaters).

T2.18 *How and who decides to reallocate street space from parking for people ?* People are intended to walk on the sidewalks rather than on the streets, and *SDOT routinely issues temporary "street closure" permits for special gatherings. Thus, the appropriate Transportation Policy here should be that SDOT promote the accessibility to these street closure permits, but not close the streets permanently?*

T2.19 *Will SDOT build and maintain street use primarily for all forms of transportation modes or will the streets be designed or allocated as parks?*

TRANSPORTATION OPTIONS

T G 3 Expand equitable access to multiple transportation options*. LCC agrees that "one size does not fit all" for a successful transportation system.*

The policies in this section are well thought out and LCC supports:

T 3.1- T 3.23, except T 3.9. "Prioritize transit Investments on the basis of current or potential ridership, etc". *How will SDOT change its transportation resources within its regional transportation links to address the dramatic shift in commuter demand from 5 days a week to 3 days with heavy users on Tues/Weds/Thurs as employers continue to offer flexible work schedules for employees to be "in the office*"**?** While there may be a slow return of employees, Seattle should plan for varying capacity needs based upon the day of the week to ensure there is adequate space for transit users as well as other modes including trips via cars be they shared, electric, etc. this is why converting roads into "gathering places" would be in conflict.

What plans are in place to install and maintain the missing and broken City sidewalks?

T 3. 10 and T3.21 is supported by LCC. Potential users in the residential neighborhoods have a 40 minute walk to the Montlake Light Rail. The "last mile" or two is offered instead at another Light Rail station in the U District where most neighbors do not enjoy connecting there for safety reasons so they do not use it at all. These same issues are

important for bike and pedestrian safety for the “last mile” which really matter. Safe intermodal connectivity should be a top priority.

Building a Green Transportation System

TG 4 LCC supports transportation systems that improves the environment and air quality

T4 .1- T4-12. *LCC supports these policies* for adding new electric vehicles, **adding public charging infrastructure, enhancing the street tree canopy and improving fish p**assage and better capturing of storm water.

27-4 cont

T 4.3 *How does reducing general purpose lanes all day reduce drive alone cars?* This really does not work because drivers will find other streets to use, or their vehicles will sit in traffic spewing out more emissions than they should due to squeezed capacity. *Should SDOT restrict transit-only lanes during am and pm peak, then open them to all users after non-peak hours?*

Supporting a vibrant Economy

TG 5The transportation system improves mobility ... and promotes economic opportunities throughout the City. LCC agrees that without reliable roads, freight will not be able to provide competitive services for residents and businesses.

T 5.1-through T 5.10 LCC supports these policies which support the movement of goods throughout Seattle and Region by vehicles, rail and connectivity to air and drone devices.

T 5.11 activating right of ways for the public is a departure from the core transportation goals and LCC does not support it.

Promoting Safe Travel for All

TG 6 Ensure Seattle’s transportation is safe for all ages and abilities. LCC strongly supports this keystone goal. Without safety, SOV increases, and transit can fail.

T 6 .1-T6.9 Policies are good and LCC supports them, especially T 6.9 on improving lighting near transit stops.

T6.12 How can the City of Seattle ensure and co-fund if necessary adequate Transit Police throughout the Light Rail system in Seattle and work with King County Metro for funding that provides King County security/police for its bus services?

Connecting to the Region

TG 7 LCC agrees that Seattle and Regional projects should be consistent among goals.

T 7.1 through T 7.11 are policies between local and regional entities and LCC supports these connectivity efforts that ensure the transportation corridors work seamlessly.

LCC add:

T 7.12 How can the City of Seattle require WSOT to ensure that the Washington State Ferry System has adequate service and well maintained boats to service the work force commuters from Bremerton, Vashon, Bainbridge, Whidbey and the San Juan Islands?

Operating and Maintaining the Transportation System

TG 8 Transportation assets should be maintained and renewed is strongly supported by LCC especially bascule bridges, State and Federal highways and local bridges, roads.

T8.1 through T 8.7 work to operate a solid transportation system but falls short on maintenance. 27-4 cont

Add T 8.8 LCC proposes that the City utilizes the recent comprehensive audit of bridges and roads with the requirement it be used to prioritize their repairs and maintenance.

Funding the Investment that we Need

TG 9 states, "Transportation funding is sufficient to operate, maintain, and improve the transportation system that supports the City..."

Since the public transportation system is an essential City service, how can its Budget's meet operating and capital budgets without relying on tax levies exclusively on property owners to fund all of its expenses? This can be applied to the T 9.9 policy.

T 9.1, T 9.2, T 9.3, T9.4, T9.5 and T 9.6 discuss partnering with other local agencies and governments for inter-funding regional transportation and LCC agrees with that approach.

T 9.10 Considers use of transportation impact fees to fund the transportation needs. *Should the City collect impact fees from all developers to pay for the Transportation Budget capital expenses to reduce the tax burden on property owners?*

T 9.12 Planning for 6-year capital improvements. *How will the City of Seattle Bridge and Road audits be used to prioritize projects?*

T 9.13 Identify alternative funding sources. *Which transportation priorities can be funded by federal, state and regional sources for its capital improvement projects*?

Because all transportation modes have capital and operating expenses should users "pay a fair share" back to the City? Should everyone pay an affordable fare for bus service, Light Rail, ferries, shared bikes, scooters, and a portion of tolled roads into the Seattle and Regional transportation budgets?

HOUSING

The OneSeattle Plan notes that job growth in the City grew by 38%, its housing stock grew by only 19% which has led to supply/demand price increases for its residents. Of course, not all of the employees in Seattle want to live in the City, but the pricetag of regional housing has climbed as well. The King County Growth Management Council target for Seattle is to produce 112,000 units over 25 years (2018-2044) in each of the 27-5

Area Median Income (AMI) level, which translates to over 43,000 units of units for income earners below 30% of AMI. Because the costs of providing the land and structures also have climbed, subsidies from every source is essential.

H G1 and H G 2 Expand Seattle's housing supply to meet current and projected needs for all economic groups. **LCC agrees that more stock will help stabilize housing needs.**

H 2.1- H2.3-LCC *What percentages of the 112,000 units produced will be less than 69% of AMI for renters and less than 89% for owner occupied units?*

HG 2.1 through HG 2.2 LCC agrees expanding capacity of all types of housing are important, and monitoring the inventory by price and type is essential for planning.

HG 2.3 Removing regulatory "barriers" for less expensive housing. *LCC disagrees for 2 reasons. Even if units take longer and a bit more money to build, why don't affordable housing residents of all incomes deserve the benefit of Design Review, vegetation and saving trees? How can SDCI and the Office of Sustainability enforce existing tree preservation to prevent concrete "heat islands" in Settles' neighborhoods?*

HG 2.4 LCC agrees that small landlords can often produce less expensive housing units and should be supported*. What legislation passed by City Council should be re-evaluated as anti-landlord regulations which may be creating obstacles for small landlords from increasing small scale rental housing units?*

HG 3 Seattle should supply affordable housing to all who want to live there.

LCC questions whether the City can/should supply housing for all since its land value is high and people (e.g. with large families) may need/want to live somewhere else. This works when the City has a frequent and reliable transportation system network, and Seattle is just a few years away from the Light Rail extensions to the Eastside, Lynnwood and points north. This will open up greater land space for those who work in Seattle but can afford and want to live outside the City. *Should Seattle be the only entity to produce all of the types of housing to house everyone working within its City limits?* With improved Light Rail regional network, HB 1110 requires adjacent "bedroom communities to also build a "fair share" of housing for all income levels.

27-5 cont

HG 3.1-*How can Seattle source more federal funding for permanent affordable housing? Seattle is a employment hub but high tax levies for housing and transportation have placed a heavy tax burden on property owners, leading to higher housing costs*.

HG 3.2 LCC agrees to expand more long term affordable (<30% AMI)

H 3.4 LCC agrees that the City should build in more affordable housing units near frequent transit to save total cost of living savings for low income residents

H3.6 LCC "*When and how will comprehensive "audits" be compiled for measuring the actual inventory of affordable housing and check on their health and safety compliance?*

H 3.9 LCC *supports building long-term housing on publicly owned sites (not parkland)*

H 3.10 Waive development standards for affordable housing*. LCC objects to this because people with less income DESERVE trees, sidewalks and the other benefits of good urban planning , and it will enable these units to "fit in" and last longer, preventing future displacement..*

H 3 11- H 3.21 *What policies can be formed that lead to own ownership for residents and tax incentive saving for developers of lower income units especially < 60% and 30% of AMI?*

EQUITABLE ACCESS to HOUSING

Goal H G 4 Housing should be available for all . LCC agrees

H 4.1 -H 4.5 LCC supports policies to promote access to housing of all types throughout the City

H 4.5 Remove zoning to add low income housing-*Why would Seattle add more building heights and setbacks as existing housing units when that is not required by HB 1110?.*

H G4.7-4.10 LCC supports open and educated process of finding appropriate housing

HOUSING SECURITY and STABLE COMMUNITIES

H G 5 Residents should be able to remain in place and thrive without fear of displacement and housing discrimination

H 5.1 *LCC agrees that vulnerable populations, especially seniors from displacement.*

H 5.2 through H 5.12 *What city regulations can be added to prevent displacement of existing residents, and providing pathways for more home ownership?*

27-5 cont

H 5.13 Property tax relief for low and fixed income residents*. What programs enable seniors to "age in place" without getting "taxed out" of their home?*

Diversity of Housing Types

H G6- *Seattle can produce a full range of housing types that fit into existing heights. Should more duplexes, tri-plexes and small low rise muti unit apartments be encouraged rather than townhouses that are difficult for seniors and families?*

H 6.1-H 6 Policies that promote all types of housing units from small to large which accommodates multi-generational and large families,

H 6.7 Advocate for State legislation to encourage the production of *What changed in the State will incentivize production of more condominiums and co-ops? LCC supports this action to enable first time buyers to build equity as they pay for housing. This can lead to wealth building for individuals and families.*

HOUSING CONSTRUCTION, QUALITY and DESIGN

H G7 LCC agrees that Seattle's housing units should be carbon neutral healthy and safe

H 7.1 LCC agrees with regulations and enforcement of safe and healthy housing stock

H 7.2 *Why is the City incentivizing the use of CLT building material exclusively ?* While it is fast growing, the quality of this wood aging over time should be assessed before recommending it. (e.g. **Burke Museum use of CLT may not be the desired outcome)**

H 7..3- and H 7.9 and H 7.10 *Which policies are applied to affordable housing units making them more livable and using sustainable materials that reduce carbon footprint and are healthy with open space that promote light and social spaces?*

To survive the potential rising temperatures of Climate Change what resources will the City retrofit HVAC systems to convert to provide air conditioning and more energy efficient systems that reduce use of carbon fuels?

H 7.5 **LCC supports re-purposing historic buildings for residential uses**

H 7.6 *What criteria and incentives can the City provide for converting non-residential buildings to housing use, considering the overbuilt supply of office spaces?*

Homelessness

The two main reasons for chronic homelessness are drug addiction and behavior health issues. Seattle has tried just about every type of approach to find permanent solutions for housing those who are unsheltered and has learned some things about what may work to achieve a reduction in homelessness.

H G 8 Homelessness is rare and brief, and there is a need for emergency housing as a step for permanent housing. *LCC agrees for the need for emergency housing but does not agree that it is necessarily brief, and rather can also be chronic.*

HG.8.1 -H 8.2 Implement programs to secure emergency housing units to meet needs. ***LCC agrees. How many shelter beds will be available for drug users with services to detox? How will the State and County partner with Seattle to supply adequate behavioral health facilities for unhoused mentally ill individuals.***

27-5 cont

HG 8.4 Collaborate with other jurisdictions to provide permanent housing and services LCC agrees that Seattle can/should provide resources for those who are homeless in the City, but other regional area governments can share in responding to emergency housing and services.

HG 8.7 *As a component of a solution for homelessness, do all services provide "a path home" to reunite families around the country for a permanent housing solution?*

H 8.6 "Remove regulatory barriers" to allow homes on properties for homeless people. *LCC does not know of any "regulatory barrier" that precludes occupation of housing units on owner occupied property*.

Climate and Environment

Seattle aka, The Emerald City, has been impacted by rapid growth, Climate Changes in weather and the lack of City codes that have accelerated tree canopy loss since the 2015 Comprehensive Plan. Carbon Pollution Reduction has been helped by the Climate Action Plan of 2006, but much more needs to be implemented.

27-6

CE G1 *Which climate resiliency goals must be met to achieve carbon neutrality by 2050?* LCC strongly supports this goal to keep our City and world sustainable.

CE 1.1 -1.*3 LCC agrees that using data to track our actual GHG output and which City office will ensure that the targets are met?* Seattle needs to develop new policies and practices to meet the targets in partnership with the Green New Deal will enable Seattle to help reach a net neutral position.by 2050.

27-6 cont

CE 1.4 LCC supports partnerships with other local jurisdictions and academic institutions to build science-based programs to reduce GHG, and analyze actual data points to assess Seattle's position towards those goals.

Transportation

CE G 2 LCC supports the goal of reducing GHG from transportation modes.

CE 2.1 through CE8. 5 *LCC agrees* with these policies to achieve lower emission by enabling more local services that are walkable in a City-wide equitable way.

When and how can Seattle require all delivery vehicles to be carbon neutral by 2035?

Extreme Heat and Wildfire Smoke

CE G9 LCC supports the goal to be prepared for excess heat and wildfires

CE 9.2. Design and retrofit City capital facilities. LCC supports this and was pleased that the City libraries are being retrofitted for air conditioning as a refuge for extreme heat.

CE 8.5 and 8.5 Mitigate economic impacts of transitioning to carbon neutral on low-income individuals and fixed income seniors.

When will the SPD North Precinct SPD be replaced with two new buildings -one near Ballard, and one near the U District to protect growing populations and the SPD officers to ensure adequate Public Safety coverage and a healthy facility for officers?

CE 9.3 Expand tree canopy and greenspace. *When will a separate City Tree department be established to track the status of the state of the Tree Canopy policies to prior legislation which may have adverse outcomes on the tree canopy and open space preservation?*

CE 9.5-CE 9.7 *What City policies will protect urban critters, outdoor workers, and owners on how to protect all Seattleites from extreme heat in their buildings?*

Sea Level Rise and Flooding

Seattle must be prepared to face the reality of rising sea levels due to ice melting from Global warming.

CE G10 LCC agrees that Seattle needs plans for adapting to rising sea levels

CE 10.1 through 10.4 ***What are the City's planning and education policies to prepare for high sea levels and focus on restoration of resilient ecosystems, including an annual assessment of Seattle's Seawall condition?***

27-6 cont

Tree Canopy

LCC agrees with the overarching statement that the Tree Canopy is fundamental to *Seattle's quality of life.*

Trees perform functions such as "cleaning the air" and removing carbon. Trees provide shelter for an intricate ecosystem of urban critters and provide shade for people on hot days, and mature trees "mother" other smaller or distressed trees to maintain their health. Tree clusters prevent "heat islands" from forming and absorb storm water run-off. Seattleites espouse to be tree protectionists, but the tree canopy shrunk from 2019-2021 by 1.7%, mainly from neighborhood residential developed lots and in its Parks natural areas. Together, those 2 categories caused 78% of the canopy reduction (data taken from the City of Seattle Tree Canopy Assessment Report published 2023)

CE G 12 ***Seattle has a goal of 30% tree canopy (used to be by 2030??) LCC agrees that increasing the tree caonopy will buffer Seattle from the adverse impacts of Climate Change. The City unfortunately lost 1.7% from 2018-2021.***

LCC ***supports polices CE 12.1- CE 12. 9 to preserve and expand the tree canopy to 30%.***LCC would also add:

CE 12.10. When will the Seattle City Council review the tree canopy data yearly to evaluate if its tree protection ordinances are ensuring that mature trees are being preserved? If the City loses more tree canopy, the Council should amend tree regulations to better preserve and meet the City's tree canopy coverage of 30%,

WATER

CE G13 LCC agrees that water is an essential resource that must be sustainably managed. ***How are the City's reservoirs being protected and maintained?***

CW 13.1-CE 13.9 ***LCC supports all of the recommended policies to protect the pure water that Seattle has and find ways to clean contaminants and or reuse waste.***

Healthy Food System -Food is essential for the health and well-being of our communities and healthy food options must be available to all ages and income levels throughout the City.

CE G 14 Goal that Seattle has accessibility to healthy food. LCC agrees.

CE 14.2 Support convenient access to nutritious food from a variety of sources.

What requirements and incentives will the City enact to incentivize the retention of grocery stores that supply fresh produce and protein?

CE 14.3 Not clear about "settler colonialism and racism" concerning access to food" *"Can the City offer tax credits to maintain large grocers and add indigenous sources and public safety measures to prevent retail theft"?.*

27-6 cont

CE 14.4 through 14.8 LCC agrees with policies to increase food access and reduce food waste.

ARTS and CULTURE

Cultural Spaces Place making and Place Keeping

27-7

The description (p 166) states that by 2044 Seattle's neighborhoods will have cultural spaces including theaters, galleries, cinemas, museums, music venues and art studios that reflect the rich cultural diversity in the City.

AC G *1 LCC supports the goal for all neighborhoods to have affordable cultural spaces...* for people of all ages and abilities. *How will the City decide with* be *conflict between allocating surplus public land for cultural uses when the goal of more housing is paramount?*

AC 1.1-AC 1.3 LCC supports maintaining spaces for performing arts and artist studios and their housing.

AC 1.4, AC 15, AC 1.6 Encourage re-purposing of historic community buildings such as surplus schools to adapt for performance arts as well as in parks, libraries and community centers. LCC supports these policies for broad use for musicians, dance, etc., but cautions against the exclusive use of public recreational buildings exclusively dedicated long term for only one user.

AC 1.7 , AC 1.9, AC 1.10, AC 1.11, AC 1.12 and AC 1. 13 LCC supports the City grants to help local communities to preserve their cultural arts, and encourage a sense of community with murals or artwork. As those funds grow, in 20 more years, more art will be funded to install in most neighborhoods.

Public Art

Seattle was a forward-looking city and allocated 1% of its budget to support the arts including art installations.

AC G 2 LCC supports this goal of funding neighborhoods creative expression through its publicly displayed artwork to reflect a variety of cultural backgrounds.

LCC supports policies AC 2.4, 2.5, and 2.6 which encourages public participation in acquiring or commissioning artwork in the recipient communities. *How will this process of procuring public art be open to the general public for their comments and focus on pieces that is easily identified as an icon or artform that represents a significant place?*

Creative Economy

Seattle's downtown has a long-storied history offering a wide variety of performing arts, the Seattle Symphony, SIFF theaters, Climate Pledge Arena concerts, art galleries and

world class museums. The impact of these art and cultural businesses fuel a vital the downtown night life as well as attract tourists that fuel the City economy.

AC G3 How *can artists and performers who are vital to Seattle's economy be provided with affordable venue opportunities to thrive so the arts can also thrive?*

27-7 cont

AC3.1-through AC 3.11 *When the City offers subsidized affordable housing units can several be allocated to provide housing and studio space for a wide range of artists?*

AC 3.11 *LCC supports the City's policies to reduce the risk of displacement of performers, artists and their venues as the City grows its developed footprint.*

Youth Development and Arts Education

The access to all types of arts education is not guaranteed for Seattle's young students It is outreach, special parent PTA funding and City funding that makes it possible for the City's youth to participate in the arts. The seeds of creative performing expression and creating artwork is an important outlet for many students and LCC supports funding to make that accessible for EVERY child in Seattle.

AC G 4 *What financial resources from Seattle can support this policy to have arts and music education in every Seattle public school?*

AC 4.1, AC 4.2 and AC 4.3. LCC strongly supports forming partnerships within its resources to support access to arts for all youth.

PARKS and OPEN SPACE

Seattle's residents often define their neighborhood and favorite activities by their favorite park or Public Space. *WIth the past 10 years growth of 38% in employment, and the 12- year population increase of 23.5% from 2010 to 2022, local residents are feeling the "squeeze"! Fortunately, the City owned park and recreation lands are protected from conversion and a new tax for parks in 2014 adds to the City's budget allocation to more than adequately funds their capital improvements and operations. Access to Parks and Recreation and Open Space saved the sanity of many residents during the Covid-19 pandemic and mitigates the impacts of Climate Change in the future.*

27-8

Equitable Provision of Public Space

P G 1 LCC supports the goal of expansion and enhanced access to public spaces as the City grows, and provide residents access to a full range of recreation for all residents

P 1.1 through P 1.18 LCC supports these general policies to serve the many needs for all ages, abilities and locations throughout the City in an equitable way.

P1 .116 *"Consider the use of open space impact fees to support public space".*

Who will pay these fees? It is not defined, and should developers pay for some amount as a public benefit when they displace natural open space with developments?

P!..17 *How can SP& R continue and expand partnering with Seattle Public Schools to including use of after school gym facilities to be run by SP&R"?*

P1.19 Mitigate noise and pollution on public space is an excellent goal. ***How can SPR prevent nuisance noise from Seattle parks and open spaces impacts onto residential neighborhoods from the SPR activities when changing uses? Specifically what SEPA process is utilized when siting pickleball courts which emit 70 decibels of noise onto nearby homes which detracts from the restorative quieting function of the parks?***

27-8 cont

P 1.20-P1.25 LCC *agrees -SP&R should restore contaminated spaces and develop new and weather protected covered spaces in an equitable way throughout the City.*

P1.26 Joint use developments- ***How can public use mixing housing with SP&R community centers ensure public access to facilities?***

Recreation, Activation and Programming

P G2 ***LCC supports this goal to provide a wide variety of recreational, social, activities and events for all ages and abilities***

P2.1 "develop activities based on the needs of each community they serve" LCC supports this general concept but "who decides" is unclear.

When will the City re-establish "all-City" community representation using local 5- 8 person Advisory Boards with 7 city-wide District boards? Which groups now give feedback and are accountable for the recreational, social and events planned to be sure resources are distributed more equitably?

P 2.4 and 2.5 LCC supports the use of parks for nature play and use for all ages.

P 2.6 ***Why is the City even considering the sale of alcoholic beverages in the City's parks and Open Spaces? The impact of marijuana use and smells is already detrimental, and adding alcohol will create drinking parties which can lead to untoward behaviors in the parks and discourage families use. Has the City considered expanding non-alcoholic drink sales such as bubble teas?***

When will SP&R build more public pool access to support the City's Initiative of "Swim Seattle".? The City is surrounded by water and every person who lives here should know the basics of how to swim for their safety.

Operations and Maintenance

P G 3 LCC supports maintenance of public space operations with eco-friendly methodology.

P 3.1 -3.7 and P 4.4 Agree with environmental sustainability practices and use the positions to train youth and homeless in skilled employment.

Partnering with Communities

P G 4 Empower community members and organoztions to help shape facilities. ***LCC supports this as "part "of design and use but prefers that there be a broader scale public input to design permanent public park facilities to include all ages and abilities.***

P 5.1- 5.3 LCC agrees to enhance the parks' health and protect its trees, and mitigate the adverse effects of Climate Change.

COMMUNITY INVOLVEMENT

Engaging all Seattle Residents Equitably

CI G 1 . *LCC supports the City has numerous boards for many aspects of City life from the formal Design and Planning Commission Boards to numerous advisory boards to specific historic preservation and transportation boards which represent a significant amount of community involvement in decision making. The process is open to the public and there is a vetting process for its members diversity and relevance.*

CI 1.1- 1.1.6 LCC supports inclusion of community involvement in its decision making and planning. LCC adds these comments: *How does Seattle ensure transparency of access to broad community input and educate how "it works" for giving feedback in decision making. How did OPCD and SDOT "Move Seattle" proposed levy, and THIS OneSeattle Comp Plan, decide to do outreach only with the small eight groups who are all located in the south half of Seattle with one in West Seattle to shape it*?

Which groups or non-profit organizations are being contacted in the explosive growth areas of downtown, South Lake Union and the dense Urban Villages north of the Ship Canal?

How can the City be more inclusive and "balance" its outreach approach to hear from more than the same "eight small group inputs" or street fair folks to capture the diverse input from all who live and work here?

27-9

Engagement Partnerships

CI G 2 LCC supports community engagement from community based partners.

LCC supports C1 2.1-CI 2.5 *and adds:*

When will the City re-instate funding for the Department of Neighborhoods to establish inclusive community councils and/or City Council District advisory boards? What criteria should be required to ensure these councils be open and accountable to their membership to capture input from every part of the City as a sounding board?

Building Community Capacity

CI G3 LCC supports the goal of engaging all people in the community to participate in how their city is making decisions.

C 3 3.1through C 3 3.4 LCC supports developing skill sets for all community members to participate in the City's decision making, especially in underrepresented communities.

How does City weigh "comment stuffing" as it reports about City project feedback from one-minded groups which can result in skewed influence on City policies. How does the City respect and report on the minority participants to consider the merit of all inputs?

Indigenous Engagement

CI G4 The City should include the Indigenous tribes in all major decisions about planning for the City's future needs and sustainability. LCC supports this relationship and wisdom.

27-9 cont

CI 4.1- CI 4.9 *What systematic outreach maintains treaty rights and utilizes the Tribes best practices to keep the land and ecosystem viable for the future generations?*

Respectfully submitted,

Colleen McAleer

President of Laurelhurst Community Club

Exhibits:

Density with context sensitive design and respecting Seattles' neighborhood character can work, with **tree retention and natural materials and design standards:**

6- Plexes in traditional neighborhoods

NO-No vegetation but 24 garbage cans Yes-retain mature trees and natural pallet

YES - Tri-plex with vegetation and natural community character

YES Townhomes and tripexes in traditional neighborhood with natural materials

May 5, 2024

Jim Holmes, Office of Planning & Community Development
Mailing Address: P.O. Box 94788, Seattle, WA, 98124-7088
PCD_CompPlan_EIS@seattle.gov

From : Laurelhurst Community Club Council

RE: One Seattle Comprehensive Plan 2040 Comments

Dear Mr.Holmes and the Seattle Office of Planning and Community Development:

The great cities of both the US and the World have experienced many of the same challenges in planning for future growth. The DRAFT One Seattle Plan document is lengthy but provides a good workable framework for the City to set goals and enact the policies to achieve them over the next 10-year planning cycle.

The Laurelhurst Community Club Council (LCC) represents over 5,000 residents and small businesses in north Seattle, and has examined the One Seattle draft, attended the OPCD outreach meetings and shared input from many non-profit organizations. 28-1

LCC has also studied how other large cities in a growth trajectory plan to supply housing units for a range of incomes amidst their housing stock of high cost of market rate homes. Solutions vary from New York City, Vienna, Singapore and Hong Kong in building maximum units on government owned land and/buildings, partnering with private developers to build affordable units within the city (Seattle's primary model), offering federal, State and local tax cut exemptions to build more affordable units and building efficient, low cost transportation systems to enable their City's work force to live outside city limits at a lower cost of land and housing.

In keeping with One Seattle's goals, the best example of transparency for planning and inclusion processes is the City-State of Singapore which does is publicly with a 3-D display of an updated master plan model of the entire city. As it updates development and planning, it delineates its old and new neighborhoods, location of subsidized units, and plans for "reclamation" of new land owned by the government added to its shores. ***How can Seattle's OPCD become a more open planning process to all?***

The One Seattle Comprehensive Plan contains noble goals and policies for the next 10+ years. ***However, many of them are very general and should be based upon the effectiveness of the positive outcomes of policies of the past 15 years, as well as identify the unintended consequences, and better addressing emerging trends.***

Our comments below are focused on: General Goals, Growth Strategy, Land Use, Housing, Transportation, Climate and Environment, Parks and Open Space, Arts and Culture and Community Involvement:

Growth Strategy

The GS G1 Goal of creating complete communities for the inclusive needs of all ages and abilities is the overarching One Seattle Comprehensive Plan.

GS 1.2 Encourages a variety of housing types is lofty to be inclusive and age-in-place, but is not specific. ***Has a real estate tax cap for seniors been studied to help predict and manage elders' tax bills so they can truly age in place?***

GS 1.3 Accommodate non-residential uses in neighborhoods seems counter-productive to building housing stock when many office and commercial buildings sit empty**..** ***How would this policy prioritize and preserve housing units?***

LCC agrees with building density along existing transit routes, avoiding ECA areas and better planning for transportation, parks and recreation for new planned density areas.

28-1 cont

The 2015 Comp Plan was deficient in requiring adequate infrastructure support for density. How does One Seattle plan to finance the needed new infrastructure?

The U District area including the University Village now has over 4,000 new residents and receive almost no City amenity funds, the developments ***and actually closed NE 41st St community center*** nearest b*ecause it did not meet a body mass and racial profile.* ***How can the City meet the increased facility needs with its plans for adding 100,000 more residents?***

LCC supports GS 1.4 and GS 1.9 which calls for the City policy to match dense housing in Regional and Urban centers with MORE public amenities.

LCC supports GS G2 Seattle's development pattern that results in a range of vibrant places that all play a role in housing and jobs.

LCC supports GS 2.1 Use the FLUM to guide land use regulation (adding no exceptions)

GS 2.2 Require FLUM amendments only intended to change the intended function.

How can FLUM amendments be prohibited from piecemeal projects by developers looking for exceptions and departures that cause the overarching plan to disintegrate?

LCC agrees with the description of the place types (page 19, figure 1). Renaming Urban Centers that serve the NW Region and State should be Regional Centers.

Urban Centers utilized by County and City residents and employees fit the new name. LCC strongly supports more Regional and Urban Centers proposed at Northgate and 130th adjacent to the new Light Rail stations and for future ones in West Seattle Junction and adjacent to Light Rail stations through the Rainier Valley. ***Should Aurora Ave be a designated Urban Center with a Master Plan for dense housing with commercial and support service amenities e.g grocery stores and pharmacies, that also retains its light industrial and commercial small businesses?***

LCC supports GS 4.3 allowing a wide range of housing types, and again would like to add**:** ***GS 4.6 Do Urban Centers require retaining or anchoring essential large grocers and a child care facility in these zones to make walkable neighborhoods'?***

Neighborhood Centers (figure 7) would be a new zoning type option to add density and comply with State bill HB 1110 which requires "middle housing" type options with 4-6 units within 1/2-mile walking distance of a major transit center.

GS 5.1 "designate Neighborhood Centers with a commercial core, diverse housing options within walking distance to shops, services and transit". LCC agrees that this best complies with HB 1110.

GS5.2 Allow all types of diverse housing types and services. LCC disagrees that it should be centered with *institutional* services. Larger scale services should be in Urban Centers.

28-1 cont

GS 5.3-Zoning heights 3-6 stories . ***Why are 5-6 stories the goal for Neighborhood Centers, which double the existing height limits? LCC suggests heights should be 2-4 stories maximum as suggested in HB 1110 to conform to existing heights. These denser units that would better transition to existing while doubling housing units.***

Add : GS 5.6 Why isn't there an OPCD and/or SDCI code change that Neighborhood Centers require a "Master Plan" to ensure context sensitive scale and aesthetic compatibility to adjacent existing buildings, especially residences?

Urban Neighborhoods- Seattle's neighborhoods are the heart of the City. People ask "what's your neighborhood" to start a fun conversation, and they support community building throughout the City.

GS 6.1 Designate Urban Neighborhoods primarily for residential development. LCC agrees that some areas need to be designated as quiet places to rest and enjoy, away from the noise and traffic in urban cities.

GS 6.2 Allow 4-6 stories near frequent transit. LCC disagrees and that is covered in all of the other zones, especially in Neighborhood Centers. ***Building 4-6 stories is out-of-scale and lacks the adequate infrastructure to build heavy density in this low density area. HB 1110 requires building more units in existing zoning to add "Middle housing" and does not call for adding heights or changing setbacks in those zones and better transitions at its edges.***

Major Institutions

LCC agrees with using the Major Institutions GS 8 Master Plan processes for managing their growth and uses that are needed within those boundaries as approved.

Parks and Open Space

Because the Park and open Space lands are not expanding with the rapid population growth.

GS 9.3 "Allow housing in the parks and open space ...only where it is located within a community center or pool". ***What statute in the City codes allow Seattle to change parklands use to housing? LCC rejects this hijacking public open spaces and converting it to private residences, even if City owned. It is not compatible and removes limited public space when housing can be built elsewhere.***

GS 9.4 Allow limited commercial use to activate existing buildings. LCC supports this as operating some recreational uses require expertise from commercial operators.

Area Planning

GS G10 .4 and GS 10.8 "Prioritize City resources for area planning for Regional and Urban Centers with a higher risk of displacement" ***What policies in the City's Land Use code provide long-term housing displacement for vulnerable elders, handicapped and low income residents? LCC agrees to protect existing residents from displacement whose housing costs could be now affordable, but later is too expensive.*** 28-1 cont

Annexation

GS G11 "Seattle has established a process for potential annexation of three areas".

GS 11.1 "Designate unincorporated land for potential annexation where it can be easily connected to City services". ***LCC agrees*** but cautions that any new annexation should be in similar condition to the levels of Seattle so that annexation does not cause an excess outflow of resources from the City of Seattle.

Add: GS 11.2 ***Is permanent affordable prioritized when creating "new land" from potential"lids" over transportation corridors?*** *Singapore does with proportionally when "reclaimed" land is developed from the sea*.

Land Use

LCC agrees with the statement that new zoning and development regulations intended to produce one result can *also have unintended consequences*, and in particular, displacement of existing residents and small businesses who can be "priced out" of existing locations that they call home.

LCC supports the lofty goals in LU G1, specifically ***"create housing that works for various income levels,"encourage high quality, well designed and sustainable buildings, protect and enhance the natural environment and mitigate impacts of new construction.*** 28-2

These are similar to the lofty goals of the 2015 Comp Plan but policies were rarely enforced resulting in rapid infill and increased zoning "departures" from the planned Comp Plan and MHA policies. Many of those projects failed the "quality, sustainability enhancement of the natural environment and mitigating impacts of new construction".

How will projects be considered "high quality' if SEPA and Design Review are not part of the regulatory process?

Many MHA titled housing units were built with no context to existing structures and zoning, displaced existing residents and small businesses, destroyed existing trees. Developers just wrote a check "in-lieu" into the affordable housing fund to build units far away from existing locations. "Stick trees" were planted onto right of ways and many died which deteriorated the City's tree canopy. How can Seattle prevent these

unintended outcomes and ensure "stewardship" practices for the replacement trees viability?..

The 2021 City of Seattle Tree Canopy Assessment (page 37) chart noted that in ***"Citywide redeveloped parcels", there was a loss of -39.8% in tree canopy,****(and only a -1.4% in undeveloped parcels) which resulted in 33% of the City's declining tree canopy of 1.7% from 2016-2021***. Which City policies in One Seattle will "protect and enhance the natural environment "? How will SDCI define "high quality' standards and mitigation goals?***

28-2 cont

LCC supports:

LU 1.2 Neighborhood business variety nearer to residents

LU 1.3 Apply development standards to protect public health and safety **(NO WAIVING Design review)**

LU1.5 Balance development standards vs **preventing displacement.**

LU1.6 Develop residences **away from air pollutants.**

LU 1.7 **Protect displacement** in legislative re-zone policies, especially low income and marginalized populations.

LCC has concerns about LU1.1 "a wide variety of housing types in all neighborhoods". The infrastructure in the City was not built for all densities (eg width of streets, sewer)
This was also mentioned as a concern in HB. 1110

Urban Design

LCC strongly supports the goals and policies of the natural environment:

LU G2 "Seattle's unique character and sense of place, etc and the policies that recognize the importance of retaining Seattle's native vegetation, waterways, forests and visual public views of Mt Rainier, the Olympic Mountains and the Cascade Range, as well as lakes, waterways and public shoreline access points.

What new regulatory land use codes will protect public view corridors as developers try to "outview the next one?

And LCC supports polices :LU2.1, LU2.2, LU2.3, LU 2.4, LU2.5. LU 2.6, LU 2.7, LU 2.8.

Built Environnement

LCC strongly supports **:**

LU 2.9 Encourage preservation of characteristics and features that contribute to communities multiple identities including areas of historic, architectural, cultural and social significance.

LU 2.10 creating walkable cultural scapes

LU 2.12 Will the City SDOT have designated ownership and operating plans to develop highway lids and other pathways to reunite neighborhoods?

LU 2.13 and LU 2 .14 Design walkable connections and add natural lighting and rain protection

LU 2.15 Rooftop production of fresh food is a terrific way to provide local food sources.

LU2.19. Plan to cascade heights to allow for more lower-to-higher views of water and mountains. This is a much better approach than SDCI continuing to allow view blocking with the newest buildings in the 2015 Com Plan.

LU 2.20 Prioritize not allowing negative impacts of tall buildings to block sun and views in public parks and spaces

28-2 cont

LCC does not support:

LU 2 16-18. Clustering of tall buildings, which can create ***"built mountains"*** and block public views. ***Which regulatory land use codes and agency define what is a good cluster of tall buildings?***

Public Spaces

LCC supports LU 2.21- LU 2.24 that encourages public spaces designed for a range of users.

USES Goal: LU G3 Allows every use everywhere

Will the City require Master Plans for allowing a variety of uses and some defined use areas to prevent the "Aurora Ave " lack of character and confusing zoning mess?

LCC does not support policies LU 3.1, 3.3, 3.4, and 3.6 but supports 3.5 retaining existing nonconforming use.

General Development standards

LU G4 Development standards that match each zone's function, protect health and safety and add housing and commercial spaces.

LCC Supports these policies:

LU 4.2-Standards that provide predictability for each zoned

LU 4.3 -Control of massing for compatibility for planned scale and provide open space

LU 4.7 Use setbacks to allow for light air and sunlight

LU 4.8 Use tree preservation requirements to enhance aesthetics, prevent heat islands

LU 4.9-LU 4.14

LU 4.***15 LCC supports protecting the public views through setbacks and establishing zoning blocks that protects key City views.***

LU 4.17 ***LCC supports Seismic retrofitting to minimize health risks and retain historic buildings***

LU 4.18 Can OneSeattle reinstate the use of Design Review to enhance the quality of City development by applying these best practices to "Middle Housing" and to "Affordable Housing" to minimize the stigma of "cheap housing" among its residents?

LU 4.4 and 4.5 – allowing use of maximum heights in the name of limiting ***view blockage How does this curb more view blocking throughout the city scape?***

LU 4.16 -***Why are higher heights required when current regulatory codes already provides land use code exceptions to preserve land marks?*** Requirement for higher density to preserve landmarks-too broad and not necessarily commensurate with designating a landmark.

28-2 cont

Off Street Parking

LU G5 to ***plan for alternative transportation modes***

The reality check is that an estimated 80% of Seattle's residents own a car which is the second highest urban car owners in the US. While there has been a small decrease in car ownership as the City becomes more renters than home owners, the OneSeattle must plan for their existence, especially for attracting families..

LCC supports LU 5 5.4, LU 5.5, LU5.6, LU5.7, LU5.8, LU 5.9, and LU 5.11 (for bikes)

LCC has concerns on the LU 5.1, LU 5.2 and LU 5.3 which set limits on parking. Has the City 's traffic improved due to fewer cars owned? The free market system will best sort it out and since it expensive to build, developers *will find the number of spaces to meet the needs of the residents of its housing and commercial users.*

Public Facilities and Small Institutions

LCC supports LU G6 that public facilities and small institutions must grow to meet the needs of the population if their "mission is compatible with the function and scale of the surrounding area".

LCC supports LU 6.1 through 6.4

LU 6.5 What is the process for siting essential public facilities and a policy needs to be made in One Seattle as 6.5 is too general ?

Telecommunications Facilities

LCC supports LU G7 that allows telecommunication utilities but also requires that they be vetted for public health issues.

LCC supports LU G 7.1- LU 7.5 -restrictions on the location size, mitigation of visual, noise and proximity to communities, and prohibiting locating them in residential zones.

Downtown Zones

LCC supports LU G8 to promote downtown Seattle as its densest neighborhood promoting vitality, tourism and arts and entertainment.

LCC supports all policies e.g. LU 8.4 to encourage a vital 24/7 environment.

Seattle Mixed Zones

LCC supports LU. G9 ***How will the policies of LU 9.1 and LU 9.2 promoting density in mixed use zones outside of the downtown core?***

Multifamily Zones

LCC supports ***LU G 10 multifamily zones to provide a variety of scale of household with a mix of incomes and support local walkable neighborhoods where they are located***.

28-2 cont

LCC supports LU 10.1 through 10.6, especially requiring "***high quality housing*** and development standards that promote livability and a sense of community, including landscaping and amenities.". This approach will enable Multifamily zones to be desirable and affordable in forming new desirable neighborhoods of the future.

Commercial Zones

LCC supports LU G 11 -the creation of Commercial zones that support surrounding neighborhoods and encourage long term stable businesses. Robust businesses serve both residents and employees and add to the vibrancy and into the City's tax coffers.

LU 11.1 In the statement "range of commercial zones". ***What is in the range of commercial activities? More clarity is needed to prevent incompatible development.***

LU11.4 Assigns outright height limits to commercial but then allows different height limits within the zone. **Are these lower height limits for transitions to existing 2-3 stories or does it mean grant higher height limits of 4-6 stories?**

LU 11.2, and 11.5 state "compatible blend" of housing and commercial and suggest Neighborhood commercial limits on size and heights but **does not require the necessary commercial anchor of a grocer with access to fresh produce and protein. How can access to fresh food be incentivized in OneSeattle?** *Over the past 10 years, NE Seattle has lost two QCF grocery stores (Roosevelt and Wedgwood), and a major Safeway on NE 45th Street while density in residential units exceeded 10,000 more residents with at least 4,000 more units awaiting permits at SDCI. Neighborhood Commercial should only occur where a significant food outlet is a key component, because residents cannot live on coffee alone. Requiring a type of Master Plan for these new Neighborhood Centers would help to guide a balanced result in services.*

Neighborhood Residential Zones

LU G 12 LCC *agrees with this goal* to have places in the City for residential zones, which contain various housing options and accommodate a variety of households and income.

LU 12.1, and LU 12.2

LU 12.5 height limits of LR 2 -LR3 to this policy and require to be within 1/2 mile of frequent transit service.)

LU 12.3 *-LCC mostly supports these uses.* ***How does SDCI prevent and monitor adverse impacts from small institutions and at-home businesses*** *to* ***protect the livability of residential zones and avoid unintended consequences?*** Dense residential areas should be primarily a refuge from loud City noise and traffic and must be the primary goal.

LU12.4 **LCC opposes this vague ‘‘development capacity allowance**” as it can create out-of-scale buildings with simply adding 4 units of somewhat affordable housing into a general affordable housing pool but leaves negative impacts from excess heights that change the entire character, sunlight and natural public views on existing residences who are compliant with the zone heights.

28-2 cont

Industrial Zones

LU G13.1-LU G13.*3 LCC supports all of the goals* and policies (LU 13.1-LU 13 .39) in the Industrial zoning section, and especially agrees with LU 13.29 and LU 13.30 which **requires buffer zones and compatible scale along its edges,** particularly to neighborhoods.

LU 13.35 ***How will new building heights should be limited to ‘‘protect distinct natural water views, shoreline areas and nearby neighborhoods?’’***

Local Specific Regulations

LU G 14 Local regulations supporting unique conditions. *LCC agrees* with this goal to preserve the City’s character and support special areas of interest and special needs.

LU 14.2 and LU 14.3 Can implementation of the Master Plan process help create a variety of residential and commercial development that ‘‘use a cohesive urban design and promote high levels of environmental sustainability, housing affordability and publicly available open space’’?

This approach is far superior to many of the piecemeal apartment projects that were surgically inserted into NE Seattle, on Union Bay and NE Blakeley streets. The “residential density” result is a row of cluttered market price housing units, with dumping cars on the two small side streets with no City safe and continuous sidewalks and no crosswalks for pedestrians. A “Master Plan” would have resulted in a less cluttered and poor-quality aesthetic, required developers to pay in for transportation impacts and perhaps provided better car storage, delivery truck access.

Major Institutions

LU G15 LCC agrees that the Major Institutions are regionally important, but *they must be regulated to avoid traffic, displacement and housing shortage impacts.*

LCC *agrees with the policies LU 15.1- LU 15.10 which* are the using the tools of the Major Institution Master Plans and Major Institution Overlays. The City of Seattle is a nexus of health care and education and its needs will grow as the surrounding populations grow.

LU 15.3 LCC supports ‘‘Balance the need for the major institution to grow with the need to maintain the livability and vitality of neighboring areas’’. LU 156 ‘‘ Locate

major institutions where their activities are compatible with the surrounding land uses.. and where impacts associated with future development can be appropriately mitigated''.

LU 15.10 addresses housing units***. LCC supports these recommendations not to allow any housing on, or nearby the institutions to be torn down and re-used for non-residential purposes***. The City allowed Seattle Childrens Hospital to demolish 136 units Laurelon Terrace garden condominiums with affordable rents, but allowed SCH to replace the family units with dorm room style units in the U District which went up to market price and alter divided into single room rentals and displaced families.

In assesshe Major Institutions' Master plans , will SDCI :Require the Major Institution to include an inventory of their space used in their facilities by hours used?. The goal is to first identify surplus spaces already underutilized for every institution instead of continuing to add more buildings.

28-2 cont

Require Major Institutions to identify capacity for expansion in their satellite **locations?** With enhanced technology, and virtual tools they could expand capacity using other locations linked to a main campus or medical center effectively and economically.

Require Major Institutions to declare all of their facilities (research, housing, offices, billing, etc) inside or outside their Master Plan and quantify their total Seattle footprint as part of the Master Plan process?

Acknowledging that many Major Institutions are tax exempt, has the City considered imposing fees to support infrastructure or operational services provided to them?

Historic Preservation and Cultural Resources

LU G 16 ***LCC supports the City's goals to preserve its historic and cultural resources*** and encourages adaptive use of its buildings and sites. The landmarks in Seattle tell the story (good and not-so good) of Seattle's colorful history. *Cultural resources in conjunction with the City's First Nations history are the rudder guiding all people today how to live in balance with the City's natural surroundings.*

Policies LU 16.1- LU 16.18 are all *supported by LCC* with special emphasis on using outreach to educate all citizens about the preservation processes and why they add value to the city's livability. .

As the City grows in landmarks to preserve, how has it allocated adequate resources to adequately manage the current landmarked properties and future designations needing resources to approve any modifications? Volunteers on these technical boards should have access to independent experts in historic architecture.

LCC *supports LU 16.18* but would also add more incentives:
For expensive landmarked buildings seismic retrofits, the ***City should grant owners of a real estate tax credit or deferral to protect these vulnerable assets form earthquakes.***

LU 16.19 ***How have the US Department of the Interiors' Standards for the Rehabilitation of Historic Properties been applied by the City to ensure that meet the***

guidelines for the Seattle Landmark Preservation Board's approval decisions for any major changes or demolition of any landmarked buildings or sites?

Environmentally Critical Areas

LU G17 *LCC agrees* that environmentally critical areas need regulations to protect the ecological functions, wetlands and fish and wildlife conservation.

LCC supports most of the policies of LU 17.1-LU 17.17 with emphasis on LU 17.8, LU 17.9 and LU 17.9 requiring new development in liquefaction and peat settlement areas to be designed to limit damage during earthquake and the construction processes.

28-2 cont

LCC *supports* LU 17 .12-14 Wetland protection with no net loss to protect fish and wildlife habitat.

LCC ***supports fish and wildlife regulations*** in LU 17.15 as well as LU 17.16

How does One Seattle incentivize the daylighting of streams that are now in pipes? Specifically, Yesler Creek has been buried under the Battelle site in NE Seattle and it should be required to be daylighted with any new development on the landmarked site.

LU 17.18 Abandoned landfills. ***Does SDCI prohibit development within 1000 feet of an abandoned landfill?*** The Laurelhurst neighborhood borders such a landfill and has strong concerns *about the proposed dense development within 1000* feet and its impact on the existing residential areas that border the landfill.

TRANSPORTATION

T G.1 "Transportation decisions, strategies and investments support the growth strategy for the City and the Region". LCC agrees with this goal. The 2015 Comp Plan expected Light Rail to be developed more quickly and expansively than it delivered. In 2 years Light Rail will finally connect to major employment locations on the Eastside and later to other Seattle outer neighborhoods.

T 1.1 through T 1.4 . LCC supports these policies which prescribes planning now for regional connectivity considering the long planning and execution timeline.

28-3

T 1.1 ***Do transit facilities need to include public restroom access as travel times are lengthened by new service routes. In addition? Is Transit security planned and funded to make these regional systems safe to ride at all hours?***

TG 2 Street use including right-of -way use for community***. LCC opposes dedicating the ever-dieting Seattle streets for "inviting spaces for community" within the right of way. LCC has concerns that pedestrian safety is endangered with cars, and not safe. LCC has concerns that users will be exposed to vehicular emissions. Who decides which City streets are "closed" and causes confusion and resentment of entitlement among neighbors?***

T 2.3 , T 2.7 ,T 2 .8 and T 2.9 LCC agrees that the City needs to plan for emerging delivery devices as residents often get 1-3 various types of food, and Amazon/UPS

packages delivered daily. Freight mobility is critical to commercial use throughout the City

T 2 .11 Resolving conflicts with using right-of -way spaces. LCC agrees that some street frontage space needs to be dedicated for shorter duration use and use off street parking and transit layovers.

T 2.13 and T2 14 LCC supports enhancing boulevards and alleys for all transportation modes, and alleys may be utilized for public space is not heavily trafficked.

T 2 15 and T2 .17 LCC supports creating public space (if large enough) in right of ways for children and non-motorized egress (bikers, skaters).

28-3 cont

T2.18 ***How and who decides to reallocate street space from parking for people ?*** People are intended to walk on the sidewalks rather than on the streets, and ***SDOT routinely issues temporary "street closure" permits for special gatherings. Thus, the appropriate Transportation Policy here is should be that SDOT promote the accessibility to these street closure permits, but not close the streets permanently?***

T2.19 ***Will SDOT build and maintain street use as primarily for all forms of transportation modes or will the streets be designed or allocated as parks?***

TRANSPORTATION OPTIONS

T G 3 Expand equitable access to multiple transportation options***. LCC agrees that "one size does not fit all" for a successful transportation system.***

The policies in this section are well thought out and LCC supports:

T 3.1- T 3.23, except T 3.9. "Prioritize transit Investments on the basis of current or potential ridership, etc". ***How will SDOT change its transportation resources within its regional transportation links to address the dramatic shift in commuter demand from 5 days a week to 3 days with heavy users on Tues/Weds/Thurs as employers continue to offer flexible work schedules for employees to be "in the office"?*** While there may be a slow return of employees, Seattle should plan for varying capacity needs based upon the day of the week to ensure there is adequate space for transit users as well as other modes including trips via cars be they shared, electric, etc. this is why converting roads into "gathering places" would be in conflict.

What plans are in place to install and maintain the missing and broken City sidewalks?

T 3. 10 and T3.21 is supported by LCC. Potential users in the residential neighborhoods have a 40 minute walk to the Montlake Light Rail. The "last mile" or two is offered instead at another Light Rail station in the U District where most neighbors do not enjoy connecting there for safety reasons so they do not use it at all. These same issues are important for bike and pedestrian safety for the "last mile" which really matter. Safe intermodal connectivity should be a top priority.

Building a Green Transportation System

TG 4 LCC supports transportation systems that improves the environment and air quality

T4 .1- T4-12. ***LCC supports these policies*** for adding new electric vehicles, **adding public charging infrastructure, enhancing the street tree canopy and improving fish p**assage and better capturing of storm water.

T 4.3 ***How does reducing general purpose lanes all day reduce drive alone cars?*** This really does not work because drivers will find other streets to use, or their vehicles will sit in traffic spewing out more emissions than they should due to squeezed capacity. ***Should SDOT restrict transit-only lanes during am and pm peak, then open them to all users after during non-peak hours?***

28-3 cont

Supporting a vibrant Economy

TG 5The transportation system improves mobility ... and promotes economic opportunities throughout the City. LCC agrees that without reliable roads, freight will not be able to provide competitive services for residents and businesses.

T 5.1-through T 5.10 LCC supports these policies which support the movement of goods throughout Seattle and Region by vehicles, rail and connectivity to air and drone devices.

T 5.11 activating right of ways for the public is a departure from the core transportation goals and LCC does not support it.

Promoting Safe Travel for All

TG 6 Ensure Seattle's transportation is safe for all ages and abilities. LCC strongly supports this keystone goal. Without safety, SOV increases, and transit can fail.

T 6 .1-T6.9 Policies are good and LCC supports them, especially T 6.9 on improving lighting near transit stops.

T6.12 How can the City of Seattle ensure and co-fund if necessary adequate Transit Police throughout the Light Rail system in Seattle and work with King County Metro for funding that provides King County security/police for its bus services?

Connecting to the Region

TG 7 LCC agrees that Seattle and Regional projects should be consistent among goals.

T 7.1 through T 7.11 are policies between local and regional entities and LCC supports these connectivity efforts that ensure the transportation corridors work seamlessly.

LCC add:

T 7.12 How can the City of Seattle require WSOT to ensure that the Washington State Ferry System has adequate service and well maintained boats to service the work force commuters from Bremerton, Vashon, Bainbridge, Whidbey and the San Juan Islands?

Operating and Maintaining the Transportation System

TG 8 Transportation assets should be maintained and renewed is strongly supported by LCC especially bascule bridges, State and Federal highways and local bridges, roads.

T8.1 through T 8.7 work to operate a solid transportation system but falls short on maintenance.

Add T 8.8 LCC proposes that the City utilizes the recent comprehensive audit of bridges and roads with the requirement it be used to prioritize their repairs and maintenance.

Funding the Investment that we Need

TG 9 states, "Transportation funding is sufficient to operate, maintain, and improve the transportation system that supports the City..."

28-3 cont

Since the public transportation system is an essential City service, how can its Budget's meet operating and capital budgets without relying on tax levies exclusively on property owners to fund all of its expenses? This can be applied to the T 9.9 policy.

T 9.1, T 9.2, T 9.3, T9.4, T9.5 and T 9.6 discuss partnering with other local agencies and governments for inter-funding regional transportation and LCC agrees with that approach.

T 9.10 Considers use of transportation impact fees to fund the transportation needs. ***Should the City collect impact fees from all developers to pay for the Transportation Budget capital expenses to reduce the tax burden on property owners?***

T 9.12 Planning for 6-year capital improvements. ***How will the City of Seattle Bridge and Road audits be used to prioritize projects?***

T 9.13 Identify alternative funding sources. ***Which transportation priorities can be funded by federal, state and regional sources for its capital improvement projects***?

Because all transportation modes have capital and operating expenses should users "pay a fair share" back to the City? Should everyone pay an affordable fare for bus service, Light Rail, ferries, shared bikes, scooters, and a portion of tolled roads into the Seattle and Regional transportation budgets?

HOUSING

The OneSeattle Plan notes that job growth in the City grew by 38%, its housing stock grew by only 19% which has led to supply/demand price increases for its residents. Of course, not all of the employees in Seattle want to live in the City, but the pricetag of regional housing has climbed as well. The King County Growth Management Council target for Seattle is to produce 112,000 units over 25 years (2018-2044) in each of the Area Median Income (AMI) level, which translates to over 43,000 units of units for income earners below 30% of AMI. Because the costs of providing the land and structures also have climbed, subsidies from every source is essential.

28-4

H G1 and H G 2 Expand Seattle's housing supply to meet current and projected needs for all economic groups. **LCC agrees that more stock will help stabilize housing needs.**

H 2.1- H2.3-LCC ***What percentages of the 112,000 units produced will be less than 69% of AMI for renters and less than 89% for owner occupied units?***

HG 2.1 through HG 2.2 LCC agrees expanding capacity of all types of housing are important, and monitoring the inventory by price and type is essential for planning.

HG 2.3 Removing regulatory "barriers" for less expensive housing. ***LCC disagrees for 2 reasons. Even if units take longer and a bit more money to build, why don't affordable housing residents of all incomes deserve the benefit of Design Review, vegetation and saving trees? How can SDCI and the Office of Sustainability enforce existing tree preservation to prevent concrete "heat islands" in Settles' neighborhoods?***

28-4 cont

HG 2.4 LCC agrees that small landlords can often produce less expensive housing units and should be supported***. What legislation passed by City Council should be re-evaluated as anti-landlord regulations which may be creating obstacles for small landlords from increasing small scale rental housing units?***

HG 3 Seattle should supply affordable housing to all who want to live there.

LCC questions whether the City can/should supply housing for all since its land value is high and people (eg with large families) may need/want to live somewhere else. This works when the City has a frequent and reliable transportation system network, and Seattle is just a few years away from the Light Rail extensions to the Eastside, Lynnwood and points north. This will open up greater land space for those who work in Seattle but can afford and want to live outside the City. ***Should Seattle be the only entity to produce all of the types of housing to house everyone working within its City limits?*** With improved Light Rail regional network, HB 1110 requires adjacent "bedroom communities to also build a "fair share" of housing for all income levels.

HG 3.1- ***How can Seattle source more federal funding for permanent affordable housing? Seattle is a employment hub but high tax levies for housing and transportation have placed a heavy tax burden on property owners, leading to higher housing costs***.

HG 3.2 LCC agrees to expand more long term affordable (<30% AMI)

H 3.4 LCC agrees that the City should build in more affordable housing units near frequent transit to save total cost of living savings for low income residents

H3.6 LCC "***When and how will comprehensive "audits" be compiled for measuring the actual inventory of affordable housing and check on their health and safety compliance?***

H 3.9 LCC ***supports building long-term housing on publicly owned sites (not parkland)***

H 3.10 Waive development standards for affordable housing***. LCC objects to this because people with less income DESERVE trees, sidewalks and the other benefits of good urban planning , and it will enable these units to "fit in" and last longer, preventing future displacement..***

H 3 11- H 3.21 ***What policies can be formed that lead to own ownership for residents and tax incentive saving for developers of lower income units especially < 60% and 30% of AMI?***

EQUITABLE ACCESS to HOUSING

Goal H G 4 Housing should be available for all . LCC agrees

H 4.1 -H 4.5 LCC supports policies to promote access to housing of all types throughout the City

28-4 cont

H 4.5 Remove zoning to add low income housing- ***Why would Seattle add more building heights and setbacks as existing housing units when that is not required by HB 1110?.***

H G4.7-4.10 LCC supports open and educated process of finding appropriate housing

HOUSING SECURITY and STABLE COMMUNITIES

H G 5 Residents should be able to remain in place and thrive without fear of displacement and housing discrimination

H 5.1 ***LCC agrees that vulnerable populations, especially seniors from displacement.***

H 5.2 through H 5.12 ***What city regulations can be added to prevent displacement of existing residents, and providing pathways for more home ownership?***

H 5.13 Property tax relief for low and fixed income residents***. What programs enable seniors to ''age in place'' without getting ''taxed out'' of their home?***

Diversity of Housing Types

H G6- ***Seattle can produce a full range of housing types that they fit into existing heights***. ***Should more duplexes, tri-plexes and small low rise muti unit apartments be encouraged rather than townhouses that are difficult for seniors and families?***

H 6.1-H 6 Policies that promote all types of housing units from small to large which accommodates multi-generational and large families,

H 6.7 Advocate for State legislation to encourage the production of ***What changed in the State will incentivize production of more condominiums and co-ops? LCC supports this action to enable first time buyers to build equity as they pay for housing. This can lead to wealth building for individuals and families.***

HOUSING CONSTRUCTION, QUALITY and DESIGN

H G7 LCC agrees that Seattle's housing units should be carbon neutral healthy and safe

H 7.1 LCC agrees with regulations and enforcement of safe and healthy housing stock

H 7.2 ***Why is the City incentivizing the use of CLT building material exclusively ?*** While it is fast growing, the quality of this wood aging over time should be assessed before recommending it. (e.g. **Burke Museum use of CLT may not be the desired outcome)**

H 7..3- and H 7.9 and H 7.10 ***Which policies are applied to affordable housing units making them more livable and using sustainable materials that reduce carbon footprint and are healthy with open space that promote light and social spaces?***

To survive the potential rising temperatures of Climate Change what resources will the City to retrofit HVAC systems to convert to provide air conditioning and more energy efficient systems that reduce use of carbon fuels?

H 7.5 **LCC supports re-purposing historic buildings for residential uses**

H 7.6 ***What criteria and incentives can the City provide for converting non-residential buildings to housing use, considering the overbuilt supply of office spaces?***

28-4 cont

Homelessness

The two main reasons for chronic homelessness are drug addiction and behavior health issues. Seattle has tried just about every type of approach to find permanent solutions for housing those who are unsheltered and has learned some things about what may work to achieve a reduction in homelessness.

H G 8 Homelessness is rare and brief, and there is a need for emergency housing as a step for permanent housing. *LCC agrees for the need for emergency housing but does not agree that it is necessarily brief, and rather can also be chronic.*

HG.8.1 -H 8.2 Implement programs to secure emergency housing units to meet needs. ***LCC agrees. How many shelter beds will be available for drug users with services to detox? How will the State and County partner with Seattle to supply adequate behavioral health facilities for unhoused mentally ill individuals.***

HG 8.4 Collaborate with other jurisdictions to provide permanent housing and services LCC agrees that Seattle can/should provide resources for those who are homeless in the City, but other regional area governments can share in responding to emergency housing and services.

HG 8.7 ***As a component of a solution for homelessness, do all services provide "a path home" to reunite families around the country for a permanent housing solution?***

H 8.6 "Remove regulatory barriers" to allow homes on properties for homeless people. *LCC does not know of any "regulatory barrier" that precludes occupation of housing units on owner occupied property*.

Climate and Environment

Seattle aka, The Emerald City, has been impacted by rapid growth, Climate Changes in weather and the lack of City codes that have accelerated tree canopy loss since the 2015 Comprehensive Plan. Carbon Pollution Reduction has been helped by the Climate Action Plan of 2006, but much more needs to be implemented.

28-5

CE G1 ***Which climate resiliency goals must be met to achieve carbon neutrality by 2050?*** LCC strongly supports this goal to keep our City and world sustainable***.***

CE 1.1 -1.***3 LCC agrees that using data to track our actual GHG output and which City office will ensure that the targets are met?*** Seattle needs to develop new policies and practices to meet the targets in partnership with the Green New Deal will enable Seattle to help reach a net neutral position.by 2050.

CE 1.4 LCC supports partnerships with other local jurisdictions and academic institutions to build science-based programs to reduce GHG, and analyze actual data points to assess Seattle's position towards those goals.

Transportation

28-5 cont

CE G 2 LCC supports the goal of reducing GHG from transportation modes.

CE 2.1 through CE8. 5 ***LCC agrees*** with these policies to achieve lower emission by enabling more local services that are walkable in a City-wide equitable way.

When and how can Seattle require all delivery vehicles to be carbon neutral by 2035?

Extreme Heat and Wildfire Smoke

CE G9 LCC supports the goal to be prepared for excess heat and wildfires

CE 9.2. Design and retrofit City capital facilities. LCC supports this and was pleased that the City libraries are being retrofitted for air conditioning as a refuge for extreme heat.

CE 8.5 and 8.5 Mitigate economic impacts of transitioning to carbon neutral on low-income individuals and fixed income seniors.

When will the SPD North Precinct SPD be replaced with two new buildings -one near Ballard, and one near the U District to protect growing populations and the SPD officers to ensure adequate Public Safety coverage and a healthy facility for officers?

CE 9.3 Expand tree canopy and greenspace. ***When will a separate City Tree department be established to track the status of the state of the Tree Canopy policies to prior legislation which may have adverse outcomes on the tree canopy and open space preservation?***

CE 9.5-CE 9.7 ***What City policies will protect urban critters, outdoor workers, and owners on how to protect all Seattleites from extreme heat in their buildings?***

Sea Level Rise and Flooding

Seattle must be prepared to face the reality of rising sea levels due to ice melting from Global warming.

CE G10 LCC agrees that Seattle needs plans for adapting to rising sea levels

CE 10.1 through 10.4 ***What are the City's planning and education policies to prepare for high sea levels and focus on restoration of resilient ecosystems, including an annual assessment of Seattle's Seawall condition?***

Tree Canopy

LCC agrees with the overarching statement that the Tree Canopy is fundamental to *Seattle's quality of life.*

Trees perform functions such as "cleaning the air" and removing carbon. Trees provide shelter for an intricate ecosystem of urban critters and provide shade for people on hot days, and

mature trees "mother" other smaller or distressed trees to maintain their health. Tree clusters prevent "heat islands" from forming and absorb storm water run-off. Seattleites espouse to be tree protectionists, but the tree canopy shrunk from 2019-2021 by 1.7%, mainly from neighborhood residential developed lots and in its Parks natural areas. Together, those 2 categories caused 78% of the canopy reduction (data taken from the City of Seattle Tree Canopy Assessment Report published 2023)

28-5 cont

CE G 12 ***Seattle has a goal of 30% tree canopy (used to be by 2030??) LCC agrees that increasing the tree caonopy will buffer Seattle from the adverse impacts of Climate Change. The City unfortunately lost 1.7% from 2018-2021.***

LCC ***supports polices CE 12.1- CE 12. 9 to preserve and expand the tree canopy to 30%.***LCC would also add:

CE 12.10. When will the Seattle City Council review the tree canopy data yearly to evaluate if its tree protection ordinances are ensuring that mature trees are being preserved? If the City loses more tree canopy, the Council should amend tree regulations to better preserve and meet the City's tree canopy coverage of 30%,

WATER

CE G13 LCC agrees that water is an essential resource that must be sustainably managed. ***How are the City's reservoirs being protected and maintained?***

CW 13.1-CE 13.9 ***LCC supports all of the recommended policies to protect the pure water that Seattle has and find ways to clean contaminants and or reuse waste.***

Healthy Food System -Food is essential for the health and well-being of our communities and healthy food options must be available to all ages and income levels throughout the City.

CE G 14 Goal that Seattle has accessibility to healthy food. LCC agrees.

CE 14.2 Support convenient access to nutritious food from a variety of sources.

What requirements and incentives will the City enact to incentivize the retention of grocery stores that supply fresh produce and protein?

CE 14.3 Not clear about "settler colonialism and racism" concerning access to food" ***''Can the City offer tax credits to maintain large grocers and add indigenous sources and public safety measures to prevent retail theft''?.***

CE 14.4 through 14.8 LCC agrees with policies to increase food access and reduce food waste.

ARTS and CULTURE

Cultural Spaces Place making and Place Keeping

28-6

The description (p 166) states that by 2044 Seattle's neighborhoods will have cultural spaces including theaters, galleries, cinemas, museums, music venues and art studios that reflect the rich cultural diversity in the City.

AC G ***1 LCC supports the goal for all neighborhoods to have affordable cultural spaces…*** for people of all ages and abilities. ***How will the City decide with*** be ***conflict between allocating surplus public land for cultural uses when the goal of more housing is paramount?***

28-6 cont

AC 1.1-AC 1.3 LCC supports maintaining spaces for performing arts and artist studios and their housing.

AC 1.4, AC 15, AC 1.6 Encourage re-purposing of historic community buildings such as surplus schools to adapt for performance arts as well as in parks, libraries and community centers. LCC supports these policies for broad use for musicians, dance, etc., but cautions against the exclusive use of public recreational buildings exclusively dedicated long term for only one user.

AC 1.7 , AC 1.9, AC 1.10, AC 1.11, AC 1.12 and AC 1. 13 LCC supports the City grants to help local communities to preserve their cultural arts, and encourage a sense of community with murals or artwork. As those funds grow, in 20 more years, more art will be funded to install in most neighborhoods.

Public Art

Seattle was a forward-looking city and allocates 1% of its budget to support the arts including art installations.

AC G 2 LCC supports this goal of funding neighborhoods creative expression through its publicly displayed artwork to reflect a variety of cultural backgrounds.

LCC supports policies AC 2.4, 2.5, and 2.6 which encourages public participation in acquiring or commissioning artwork in the recipient communities. ***How will this process of procuring public art be open to the general public for their comments and focus on pieces that is easily identified as an icon or artform that represents a significant place?***

Creative Economy

Seattle's downtown has a long-storied history offering a wide variety of performing arts, the Seattle Symphony, SIFF theaters, Climate Pledge Arena concerts, art galleries and world class museums. The impact of these art and cultural businesses fuel a vital the downtown night life as well as attract tourists that fuel the City economy.

AC G3 How ***can artists and performers who are vital to Seattle's economy be provided with affordable venue opportunities to thrive so the arts can also thrive?***

AC3.1-through AC 3.11 ***When the City offers subsidized affordable housing units can several be allocated to provide housing and studio space for a wide range of artists?***

AC 3.11 ***LCC supports the City's policies to reduce the risk of displacement of performers, artists and their venues as the City grows its developed footprint.***

Youth Development and Arts Education

The access to all types of arts education is not guaranteed for Seattle's young students It is outreach, special parent PTA funding and City funding that makes it possible for the City's youth to participate in the arts. The seeds of creative performing expression and creating artwork is an important outlet for many students and LCC supports funding to make that accessible for EVERY child in Seattle.

28-6 cont

AC G 4 ***What financial resources from Seattle can support this policy to have arts and music education in every Seattle public school?***

AC 4.1, AC 4.2 and AC 4.3. LCC strongly supports forming partnerships within its resources to support access to arts for all youth.

PARKS and OPEN SPACE

Seattle's residents often define their neighborhood and favorite activities by their favorite park or Public Space. *WIth the past 10 years growth of 38% in employment, and the 12- year population increase of 23.5% from 2010 to 2022, local residents are feeling the "squeeze"! Fortunately, the City owned park and recreation lands are protected from conversion and a new tax for parks in 2014 adds to the City's budget allocation to more than adequately funds their capital improvements and operations. Access to Parks and Recreation and Open Space saved the sanity of many residents during the Covid-19 pandemic and mitigates the impacts of Climate Change in the future.*

28-7

Equitable Provision of Public Space

P G 1 LCC supports the goal of expansion and enhanced access to public spaces as the City grows, and provide residents access to a full range of recreation for all residents

P 1.1 through P 1.18 LCC supports these general policies to serve the many needs for all ages, abilities and locations throughout the City in an equitable way.

P1 .116 ***"Consider the use of open space impact fees to support public space".***

Who will pay these fees? It is not defined and should developers pay for some amount as a public benefit when they displace natural open space with developments?

P!..17 ***How can SP& R continue and expand partnering with Seattle Public Schools to including use of after school gym facilities to be run by SP&R"?***

P1.19 Mitigate noise and pollution on public space is an excellent goal. ***How can SPR prevent nuisance noise from Seattle parks and open spaces impacts onto residential neighborhoods from the SPR activities when changing uses? Specifically what SEPA process is utilized when siting pickleball courts which emit 70 decibels of noise onto nearby homes which detracts from the restorative quieting function of the parks?***

P 1.20-P1.25 LCC *agrees -SP&R should restore contaminated spaces and develop new and weather protected covered spaces in an equitable way throughout the City.*

P1.26 Joint use developments- ***How can public use mixing housing with SP&R community centers ensure public access to facilities?***

Recreation, Activation and Programming

P G2 ***LCC supports this goal to provide a wide variety of recreational, social, activities and events for all ages and abilities***

P2.1 "develop activities based on the needs of each community they serve" LCC supports this general concept but "who decides" is unclear.

28-7 cont

When will the City re-establish ''all-City'' community representation using local 5- 8 person Advisory Boards with 7 city-wide District boards? Which groups now give feedback and are accountable for the recreational, social and events planned to be sure resources are distributed more equitably?

P 2.4 and 2.5 LCC supports the use of parks for nature play and use for all ages.

P 2.6 ***Why is the City even considering the sale of alcoholic beverages in the City's parks and Open Spaces? The impact of marijuana use and smells is already detrimental, and adding alcohol will create drinking parties which can lead to untoward behaviors in the parks and discourage families use. Has the City considered expanding non-alcoholic drink sales?***

When will SP&R build more public pool access to support the City's Initiative of ''Swim Seattle''.? The City is surrounded by water and every person who lives here should know the basics of how to swim for their safety.

Operations and Maintenance

P G 3 LCC supports maintenance of public space operations with eco-friendly methodology.

P 3.1 -3.7 and P 4.4 Agree with environmental sustainability practices and use the positions to train youth and homeless in skilled employment.

Partnering with Communities

P G 4 Empower community members and organoztions to help shape facilities. ***LCC supports this as ''part ''of design and use, but prefers that there be a broader scale public input to design permanent public park facilities to include all ages and abilities.***

P 5.1- 5.3 LCC agrees to enhance the parks' health and protect its trees, and mitigate the adverse effects of Climate Change.

COMMUNITY INVOLVEMENT

Engaging all Seattle Residents Equitably

28-8

CI G 1 . *LCC supports the City has numerous boards for many aspects of City life from the formal Design and Planning Commission Boards to numerous advisory boards to specific historic preservation and transportation boards which represent a significant amount of community involvement in decision making. The process is open to the public and there is a vetting process for its members diversity and relevance.*

CI 1.1- 1.1.6 LCC supports inclusion of community involvement in its decision making and planning. LCC adds these comments: ***How does Seattle ensure transparency of access to broad community input and educate how "it works" for giving feedback in decision making. How did OPCD and SDOT "Move Seattle" proposed levy, and THIS OneSeattle Comp Plan, decide to do outreach only with the small eight groups who are all located in the south half of Seattle with one in West Seattle to shape it***?

28-8 cont

Which groups or non-profit organizations are being contacted in the explosive growth areas of downtown, South Lake Union and the dense Urban Villages north of the Ship Canal?

How can the City be more inclusive and "balance" its outreach approach to hear from more than the same "eight small group inputs" or street fair folks to capture the diverse input from all who live and work here?

Engagement Partnerships

CI G 2 LCC supports community engagement from community based partners.

LCC supports C1 2.1-CI 2.5 ***and adds:***

When will the City re-instate funding for the Department of Neighborhoods to establish inclusive community councils and/or City Council District advisory boards? What criteria should be required to ensure these councils be open and accountable to their membership to capture input from every part of the City as a sounding board?

Building Community Capacity

CI G3 LCC supports the goal of engaging all people in the community to participate in how their city is making decisions.

C 3 3.1through C 3 3.4 LCC supports developing skill sets for all community members to participate in the City's decision making, especially in underrepresented communities.

How does City weigh "comment stuffing" as it reports about City project feedback from one-minded groups which can result in skewed influence on City policies. How does the City respect and report on the minority participants to consider the merit of all inputs?

Indigenous Engagement

CI G4 The City should include the Indigenous tribes in all major decisions about planning for the City's future needs and sustainability. LCC supports this relationship and wisdom.

CI 4.1- CI 4.9 ***What systematic outreach maintains treaty rights and utilizes the Tribes best practices to keep the land and ecosystem viable for the future generations?***

Respectfully submitted,

Colleen McAleer

President of Laurelhurst Community Club Council

DEIS StoryMap Comment

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Date: 5/6/2024

Comment:

The 2015 Comp Plan was deficient in requiring adequate infrastructure support for density. How does One Seattle plan to finance the needed new infrastructure?
The U District area including the University Village now has over 4,000 new residents and receive almost no City amenity funds, the developments and actually closed NE 41st St community center nearest because it did not meet a body mass and racial profile. How can the City meet the increased facility needs with its plans for adding 100,000 more residents?
LCC supports GS 1.4 and GS 1.9 which calls for the City policy to match dense housing in Regional and Urban centers with MORE public amenities.
LCC supports GS G2 Seattle's development pattern that results in a range of vibrant places that all play a role in housing and jobs.
LCC supports GS 2.1 Use the FLUM to guide land use regulation (adding no exceptions)
GS 2.2 Require FLUM amendments only intended to change the intended function.
How can FLUM amendments be prohibited from piecemeal projects by developers looking for exceptions and departures that cause the overarching plan to disintegrate?
LCC agrees with the description of the place types (page 19, figure 1). Renaming Urban Centers that serve the NW Region and State should be Regional Centers.
Urban Centers utilized by County and City residents and employees fit the new name. LCC strongly supports more Regional and Urban Centers proposed at Northgate and 130th adjacent to the new Light Rail stations and for future ones in West Seattle Junction and adjacent to Light Rail stations through the Rainier Valley. Should Aurora Ave be a designated Urban Center with a Master Plan for dense housing with commercial and support service amenities e.g grocery stores and pharmacies, that also retains its light industrial and commercial small businesses?
LCC supports GS 4.3 allowing a wide range of housing types, and again would like to add: GS 4.6 Do Urban Centers require retaining or anchoring essential large grocers and a child care facility in these zones to make walkable neighborhoods'?

29-1

29-2

DEIS StoryMap Comment

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Date: 5/6/2024

Comment:

Will the City require Master Plans for allowing a variety of uses and some defined use areas to prevent the “Aurora Ave “ lack of character and confusing zoning mess?
LCC does not support policies LU 3.1, 3.3, 3.4, and 3.6 but supports 3.5 retaining existing nonconforming use.
General Development standards
LU G4 Development standards that match each zone’s function, protect health and safety and add housing and commercial spaces.
LCC Supports these policies:
LU 4.2-Standards that provide predictability for each zoned
LU 4.3 -Control of massing for compatibility for planned scale and provide open space
LU 4.7 Use setbacks to allow for light air and sunlight
LU 4.8 Use tree preservation requirements to enhance aesthetics, prevent heat islands
LU 4.9-LU 4.14
LU 4.15 LCC supports protecting the public views through setbacks and establishing zoning blocks that protects key City views.
LU 4.17 LCC supports Seismic retrofitting to minimize health risks and retain historic buildings
LU 4.18 Can OneSeattle reinstate the use of Design Review to enhance the quality of City development by applying these best practices to “Middle Housing” and to “Affordable Housing” to minimize the stigma of “cheap housing” among its residents?
LU 4.4 and 4.5 – allowing use of maximum heights in the name of limiting view blockage How does this curb more view blocking throughout the city scape?
LU 4.16 -Why are higher heights required when current regulatory codes already provides land use code exceptions to preserve land marks? Requirement for higher density to preserve landmarks-too broad and not necessarily commensurate with designating a landmark.
Off Street Parking
LU G5 to plan for alternative transportation modes
The reality check is that an estimated 80% of Seattle’s residents own a car which is the second highest urban car owners in the US. While there has been a small decrease in car ownership as the City becomes more renters than home owners, the OneSeattle must plan for their existence, especially for attracting families..
LCC supports LU 5 5.4, LU 5.5, LU5.6, LU5.7, LU5.8, LU 5.9, and LU 5.11 (for bikes)
LCC has concerns on the LU 5.1, LU 5.2 and LU 5.3 which set limits on parking. Has the City ‘s traffic improved due to fewer cars owned? The free market system will best sort it out and since it expensive to build, developers will find the number of spaces to meet the needs of the residents of its housing and commercial users.
Public Facilities and Small Institutions
LCC supports LU G6 that public facilities and small institutions must grow to meet the needs of the population if their “mission is compatible with the function and scale of the surrounding area”.

30-1

LCC supports LU 6.1 through 6.4
LU 6.5 What is the process for siting essential public facilities and a policy needs to be made in One Seattle as 6.5 is too general ?
Telecommunications Facilities
LCC supports LU G7 that allows telecommunication utilities but also requires that they be vetted for public health issues.

30-1 cont

DEIS StoryMap Comment

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Comment:

The 2021 City of Seattle Tree Canopy Assessment (page 37) chart noted that in "Citywide redeveloped parcels", there was a loss of -39.8% in tree canopy,(and only a -1.4% in undeveloped parcels) which resulted in 33% of the City's declining tree canopy of 1.7% from 2016-2021. Which City policies in One Seattle will "protect and enhance the natural environment "? How will SDCI define "high quality' standards and mitigation goals?
LCC supports:
LU 1.2 Neighborhood business variety nearer to residents
LU 1.3 Apply development standards to protect public health and safety (NO WAIVING Design review)
LU1.5 Balance development standards vs preventing displacement. 31-1
LU1.6 Develop residences away from air pollutants.
LU 1.7 Protect displacement in legislative re-zone policies, especially low income and marginalized populations.
LCC has concerns about LU1.1 "a wide variety of housing types in all neighborhoods". The infrastructure in the City was not built for all densities (eg width of streets, sewer) This was also mentioned as a concern in HB. 1110
Urban Design
LCC strongly supports the goals and policies of the natural environment:
LU G2 "Seattle's unique character and sense of place, etc and the policies that recognize the importance of retaining Seattle's native vegetation, waterways, forests and visual public views of Mt Rainier, the Olympic Mountains and the Cascade Range, as well as lakes, waterways and public shoreline access points.
What new regulatory land use codes will protect public view corridors as developers try to "outview the next one?
And LCC supports polices :LU2.1, LU2.2, LU2.3, LU 2.4, LU2.5. LU 2.6, LU 2.7, LU 2.8.
Built Environnement
LCC strongly supports :
LU 2.9 Encourage preservation of characteristics and features that contribute to communities multiple identities including areas of historic, architectural, cultural and social significance.
LU 2.10 creating walkable cultural scapes
LU 2.12 Will the City SDOT have designated ownership and operating plans to develop highway lids and other pathways to reunite neighborhoods?
LU 2.13 and LU 2 .14 Design walkable connections and add natural lighting and rain protection
LU 2.15 Rooftop production of fresh food is a terrific way to provide local food sources.
LU2.19. Plan to cascade heights to allow for more lower-to-higher views of water and mountains. This is a much better approach than SDCI continuing to allow view blocking with the newest buildings in the 2015 Com Plan.
LU 2.20 Prioritize not allowing negative impacts of tall buildings to block sun and views in public parks and spaces

LCC does not support:
LU 2 16-18. Clustering of tall buildings, which can create “built mountains” and block public views.
Which regulatory land use codes and agency define what is a good cluster of tall buildings?
Public Spaces
LCC supports LU 2.21- LU 2.24 that encourages public spaces designed for a range of users.
USES Goal: LU G3 Allows every use everywhere
LCC supports LU G 7.1- LU 7.5 -restrictions on the location size, mitigation of visual, noise and proximity to communities, and prohibiting locating them in residential zones.
Downtown Zones
LCC supports LU G8 to promote downtown Seattle as its densest neighborhood promoting vitality, tourism and arts and entertainment.
LCC supports all policies e.g. LU 8.4 to encourage a vital 24/7 environment.
Seattle Mixed Zones
LCC supports LU. G9 How will the policies of LU 9.1 and LU 9.2 promoting density in mixed use zones outside of the downtown core?
Multifamily Zones
LCC supports LU G 10 multifamily zones to provide a variety of scale of household with a mix of incomes and support local walkable neighborhoods where they are located.
LCC supports LU 10.1 through 10.6, especially requiring “high quality housing and development standards that promote livability and a sense of community, including landscaping and amenities.”. This approach will enable Multifamily zones to be desirable and affordable in forming new desirable neighborhoods of the future.
Commercial Zones

31-1 cont

DEIS StoryMap Comment

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Comment:

In assessing Major Institutions' Master plans , will SDCI :Require the Major Institution to include an inventory of their space used in their facilities by hours used?. The goal is to first identify surplus spaces already underutilized for every institution instead of continuing to add more buildings.
Require Major Institutions to identify capacity for expansion in their satellite locations? With enhanced technology, and virtual tools they could expand capacity using other locations linked to a main campus or medical center effectively and economically.
Require Major Institutions to declare all of their facilities (research, housing, offices, billing, etc) inside or outside their Master Plan and quantify their total Seattle footprint as part of the Master Plan process?
Acknowledging that many Major Institutions are tax exempt, has the City considered imposing fees to support infrastructure or operational services provided to them? 32-1
Historic Preservation and Cultural Resources
LU G 16 LCC supports the City's goals to preserve its historic and cultural resources and encourages adaptive use of its buildings and sites. The landmarks in Seattle tell the story (good and not-so good) of Seattle's colorful history. Cultural resources in conjunction with the City's First Nations history are the rudder guiding all people today how to live in balance with the City's natural surroundings.
Policies LU 16.1- LU 16.18 are all supported by LCC with special emphasis on using outreach to educate all citizens about the preservation processes and why they add value to the city's livability. .
As the City grows in landmarks to preserve, how has it allocated adequate resources to adequately manage the current landmarked properties and future designations needing resources to approve any modifications? Volunteers on these technical boards should have access to independent experts in historic architecture.
LCC supports LU 16.18 but would also add more incentives:
For expensive landmarked buildings seismic retrofits, the City should grant owners of a real estate tax credit or deferral to protect these vulnerable assets form earthquakes.
LU 16.19 How have the US Department of the Interiors' Standards for the Rehabilitation of Historic Properties been applied by the City to ensure that meet the guidelines for the Seattle Landmark Preservation Board's approval decisions for any major changes or demolition of any landmarked buildings or sites?
Environmentally Critical Areas
LU G17 LCC agrees that environmentally critical areas need regulations to protect the ecological functions, wetlands and fish and wildlife conservation.
LCC supports most of the policies of LU 17.1-LU 17.17 with emphasis on LU 17.8, LU 17.9 and LU 17.9 requiring new development in liquefaction and peat settlement areas to be designed to limit damage during earthquake and the construction processes.
LCC supports LU 17 .12-14 Wetland protection with no net loss to protect fish and wildlife habitat.
LCC supports fish and wildlife regulations in LU 17.15 as well as LU 17.16
How does One Seattle incentivize the daylighting of streams that are now in pipes? Specifically, Yesler

Creek has been buried under the Battelle site in NE Seattle and it should be required to be daylighted with any new development on the landmarked site.

32-1
cont

DEIS StoryMap Comment

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Date: 5/6/2024

Comment:

TRANSPORTATION OPTIONS
T G 3 Expand equitable access to multiple transportation options. LCC agrees that “one size does not fit all” for a successful transportation system.
The policies in this section are well thought out and LCC supports:
T 3.1- T 3.23, except T 3.9. “Prioritize transit Investments on the basis of current or potential ridership, etc”. How will SDOT change its transportation resources within its regional transportation links to address the dramatic shift in commuter demand from 5 days a week to 3 days with heavy users on Tues/Weds/Thurs as employers continue to offer flexible work schedules for employees to be “in the office”? While there may be a slow return of employees, Seattle should plan for varying capacity needs based upon the day of the week to ensure there is adequate space for transit users as well as other modes including trips via cars be they shared, electric, etc. this is why converting roads into “gathering places” would be in conflict. 33-1
What plans are in place to install and maintain the missing and broken City sidewalks?
T 3. 10 and T3.21 is supported by LCC. Potential users in the residential neighborhoods have a 40 minute walk to the Montlake Light Rail. The “last mile” or two is offered instead at another Light Rail station in the U District where most neighbors do not enjoy connecting there for safety reasons so they do not use it at all. These same issues are important for bike and pedestrian safety for the “last mile” which really matter. Safe intermodal connectivity should be a top priority.
Building a Green Transportation System
TG 4 LCC supports transportation systems that improves the environment and air quality
T4 .1- T4-12. LCC supports these policies for adding new electric vehicles, adding public charging infrastructure, enhancing the street tree canopy and improving fish passage and better capturing of storm water.
T 4.3 How does reducing general purpose lanes all day reduce drive alone cars? This really does not work because drivers will find other streets to use, or their vehicles will sit in traffic spewing out more emissions than they should due to squeezed capacity. Should SDOT restrict transit-only lanes during am and pm peak, then open them to all users after during non-peak hours?
Supporting a vibrant Economy
TG 5The transportation system improves mobility … and promotes economic opportunities throughout the City. LCC agrees that without reliable roads, freight will not be able to provide competitive services for residents and businesses.
T 5.1-through T 5.10 LCC supports these policies which support the movement of goods throughout Seattle and Region by vehicles, rail and connectivity to air and drone devices.
T 5.11 activating right of ways for the public is a departure from the core transportation goals and LCC does not support it.
Promoting Safe Travel for All
TG 6 Ensure Seattle’s transportation is safe for all ages and abilities. LCC strongly supports this keystone goal. Without safety, SOV increases, and transit can fail.

T 6 .1-T6.9 Policies are good and LCC supports them, especially T 6.9 on improving lighting near transit stops.
T6.12 How can the City of Seattle ensure and co-fund if necessary adequate Transit Police throughout the Light Rail system in Seattle and work with King County Metro for funding that provides King County security/police for its bus services?
Connecting to the Region
TG 7 LCC agrees that Seattle and Regional projects should be consistent among goals.
T 7.1 through T 7.11 are policies between local and regional entities and LCC supports these connectivity efforts that ensure the transportation corridors work seamlessly.
LCC add:
T 7.12 How can the City of Seattle require WSOT to ensure that the Washington State Ferry System has adequate service and well maintained boats to service the work force commuters from Bremerton, Vashon, Bainbridge, Whidbey and the San Juan Islands?
Operating and Maintaining the Transportation System
TG 8 Transportation assets should be maintained and renewed is strongly supported by LCC especially bascule bridges, State and Federal highways and local bridges, roads.
T8.1 through T 8.7 work to operate a solid transportation system but falls short on maintenance.
Add T 8.8 LCC proposes that the City utilizes the recent comprehensive audit of bridges and roads with the requirement it be used to prioritize their repairs and maintenance.
Funding the Investment that we Need
TG 9 states, “Transportation funding is sufficient to operate, maintain, and improve the transportation system that supports the City…”
Since the public transportation system is an essential City service, how can its Budget’s meet operating and capital budgets without relying on tax levies exclusively on property owners to fund all of its expenses? This can be applied to the T 9.9 policy

33-1 cont

DEIS StoryMap Comment

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Comment:

T 9.10 Considers use of transportation impact fees to fund the transportation needs. Should the City collect impact fees from all developers to pay for the Transportation Budget capital expenses to reduce the tax burden on property owners?
T 9.12 Planning for 6-year capital improvements. How will the City of Seattle Bridge and Road audits be used to prioritize projects?
T 9.13 Identify alternative funding sources. Which transportation priorities can be funded by federal, state and regional sources for its capital improvement projects?
Because all transportation modes have capital and operating expenses should users "pay a fair share" back to the City? Should everyone pay an affordable fare for bus service, Light Rail, ferries, shared bikes, scooters, and a portion of tolled roads into the Seattle and Regional transportation budgets? 34-1
HOUSING
The OneSeattle Plan notes that job growth in the City grew by 38%, its housing stock grew by only 19% which has led to supply/demand price increases for its residents. Of course, not all of the employees in Seattle want to live in the City, but the pricetag of regional housing has climbed as well. The King County Growth Management Council target for Seattle is to produce 112,000 units over 25 years (2018-2044) in each of the Area Median Income (AMI) level, which translates to over 43,000 units of units for income earners below 30% of AMI. Because the costs of providing the land and structures also have climbed, subsidies from every source is essential.
H G1 and H G 2 Expand Seattle's housing supply to meet current and projected needs for all economic groups. LCC agrees that more stock will help stabilize housing needs.
H 2.1- H2.3-LCC What percentages of the 112,000 units produced will be less than 69% of AMI for renters and less than 89% for owner occupied units?
HG 2.1 through HG 2.2 LCC agrees expanding capacity of all types of housing are important, and monitoring the inventory by price and type is essential for planning.
HG 2.3 Removing regulatory "barriers" for less expensive housing. LCC disagrees for 2 reasons. Even if units take longer and a bit more money to build, why don't affordable housing residents of all incomes deserve the benefit of Design Review, vegetation and saving trees? How can SDCI and the Office of Sustainability enforce existing tree preservation to prevent concrete "heat islands" in Settles' neighborhoods?
HG 2.4 LCC agrees that small landlords can often produce less expensive housing units and should be supported. What legislation passed by City Council should be re-evaluated as anti-landlord regulations which may be creating obstacles for small landlords from increasing small scale rental housing units?
HG 3 Seattle should supply affordable housing to all who want to live there.
LCC questions whether the City can/should supply housing for all since its land value is high and people (eg with large families) may need/want to live somewhere else. This works when the City has a frequent and reliable transportation system network, and Seattle is just a few years away from the Light Rail extensions to the Eastside, Lynnwood and points north. This will open up greater land space for those who work in Seattle but can afford and want to live outside the City. Should Seattle be the only entity to

produce all of the types of housing to house everyone working within its City limits? With improved Light Rail regional network, HB 1110 requires adjacent "bedroom communities to also build a "fair share" of housing for all income levels.
HG 3.1-How can Seattle source more federal funding for permanent affordable housing? Seattle is a employment hub but high tax levies for housing and transportation have placed a heavy tax burden on property owners, leading to higher housing costs.
HG 3.2 How can the CIty expand more long term affordable especially (<30% AMI)
H 3.4 Is there a way that excess Light Rail right of ways can be used by the City to build in more affordable housing units near frequent transit to save total cost of living savings for low income residents?
H3.6 LCC "When and how will comprehensive "audits" be compiled for measuring the actual inventory of affordable housing and check on their health and safety compliance?
H 3.9 LCC supports building long-term housing on publicly owned sites (not parkland)
H 3.10 Waive development standards for affordable housing. LCC objects to this because people with less income DESERVE trees, sidewalks and the other benefits of good urban planning , and it will enable these units to "fit in" and last longer, preventing future displacement..
H 3 11- H 3.21 What policies can be formed that lead to own ownership for residents and tax incentive saving for developers of lower income units especially < 60% and 30% of AMI?

34-1 cont

DEIS StoryMap Comment

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Comment:

HOUSING SECURITY and STABLE COMMUNITIES
H G 5 Residents should be able to remain in place and thrive without fear of displacement and housing discrimination
H 5.1 LCC agrees that vulnerable populations, especially seniors from displacement.
H 5.2 through H 5.12 What city regulations can be added to prevent displacement of existing residents, and providing pathways for more home ownership?
H 5.13 Property tax relief for low and fixed income residents. What programs enable seniors to ”age in place” without getting “taxed out” of their home?
Diversity of Housing Types
H G6- Seattle can produce a full range of housing types that they fit into existing heights. Should more duplexes, tri-plexes and small low rise muti unit apartments be encouraged rather than townhouses that are difficult for seniors and families?
H 6.1-H 6 Policies that promote all types of housing units from small to large which accommodates multi-generational and large families,
H 6.7 Advocate for State legislation to encourage the production of What changed in the State will incentivize production of more condominiums and co-ops? LCC supports this action to enable first time buyers to build equity as they pay for housing. This can lead to wealth building for individuals and families.
HOUSING CONSTRUCTION, QUALITY and DESIGN
H G7 LCC agrees that Seattle’s housing units should be carbon neutral healthy and safe
H 7.1 LCC agrees with regulations and enforcement of safe and healthy housing stock
H 7.2 Why is the City incentivizing the use of CLT building material exclusively ? While it is fast growing, the quality of this wood aging over time should be assessed before recommending it. (e.g. Burke Museum use of CLT may not be the desired outcome)
H 7..3- and H 7.9 and H 7.10 Which policies are applied to affordable housing units making them more livable and using sustainable materials that reduce carbon footprint and are healthy with open space that promote light and social spaces?

35-1

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Comment:

approach.
To survive the potential rising temperatures of Climate Change what resources will the City to retrofit HVAC systems to convert to provide air conditioning and more energy efficient systems that reduce use of carbon fuels?
H 7.5 LCC supports re-purposing historic buildings for residential uses
H 7.6 What criteria and incentives can the City provide for converting non-residential buildings to housing use, considering the overbuilt supply of office spaces?
Homelessness
The two main reasons for chronic homelessness are drug addiction and behavior health issues. Seattle has tried just about every type of approach to find permanent solutions for housing those who are unsheltered and has learned some things about what may work to achieve a reduction in homelessness.
H G 8 Homelessness is rare and brief, and there is a need for emergency housing as a step for permanent housing. LCC agrees for the need for emergency housing but does not agree that it is necessarily brief, and rather can also be chronic.
HG.8.1 -H 8.2 Implement programs to secure emergency housing units to meet needs. LCC agrees. How many shelter beds will be available for drug users with services to detox? How will the State and County partner with Seattle to supply adequate behavioral health facilities for unhoused mentally ill individuals.
HG 8.4 Collaborate with other jurisdictions to provide permanent housing and services LCC agrees that Seattle can/should provide resources for those who are homeless in the City, but other regional area governments can share in responding to emergency housing and services.
HG 8.7 As a component of a solution for homelessness, do all services provide “a path home” to reunite families around the country for a permanent housing solution?
H 8.6 “Remove regulatory barriers” to allow homes on properties for homeless people. LCC does not know of any “regulatory barrier” that precludes occupation of housing units on owner occupied property.
Climate and Environment
Seattle aka, The Emerald City, has been impacted by rapid growth, Climate Changes in weather and the lack of City codes that have accelerated tree canopy loss since the 2015 Comprehensive Plan. Carbon Pollution Reduction has been helped by the Climate Action Plan of 2006, but much more needs to be implemented.
CE G1 Which climate resiliency goals must be met to achieve carbon neutrality by 2050? LCC strongly supports this goal to keep our City and world sustainable.
CE 1.1 -1.3 LCC agrees that using data to track our actual GHG output and which City office will ensure that the targets are met? Seattle needs to develop new policies and practices to meet the targets in partnership with the Green New Deal will enable Seattle to help reach a net neutral position.by 2050.
CE 1.4 LCC supports partnerships with other local jurisdictions and academic institutions to build science-based programs to reduce GHG, and analyze actual data points to assess Seattle’s position towards those goals.

36-1

Transportation

CE G 2 LCC supports the goal of reducing GHG from transportation modes.

CE 2.1 through CE8. 5 LCC agrees with these policies to achieve lower emission by enabling more local services that are walkable in a City-wide equitable way.

When and how can Seattle require all delivery vehicles to be carbon neutral by 2035?

Extreme Heat and Wildfire Smoke

CE G9 LCC supports the goal to be prepared for excess heat and wildfires

CE 9.2. Design and retrofit City capital facilities. LCC supports this and was pleased that the City libraries are being retrofitted for air conditioning as a refuge for extreme heat.

CE 8.5 and 8.5 Mitigate economic impacts of transitioning to carbon neutral on low- income individuals and fixed income seniors.

36-1 cont

DEIS StoryMap Comment

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Comment:

When will the SPD North Precinct SPD be replaced with two new buildings -one near Ballard, and one near the U District to protect growing populations and the SPD officers to ensure adequate Public Safety coverage and a healthy facility for officers?
CE 9.3 Expand tree canopy and greenspace. When will a separate City Tree department be established to track the status of the state of the Tree Canopy policies to prior legislation which may have adverse outcomes on the tree canopy and open space preservation?
CE 9.5-CE 9.7 What City policies will protect urban critters, outdoor workers, and owners on how to protect all Seattleites from extreme heat in their buildings?
Sea Level Rise and Flooding
Seattle must be prepared to face the reality of rising sea levels due to ice melting from Global warming.
CE G10 LCC agrees that Seattle needs plans for adapting to rising sea levels
CE 10.1 through 10.4 What are the City's planning and education policies to prepare for high sea levels and focus on restoration of resilient ecosystems, including an annual assessment of Seattle's Seawall condition?
Tree Canopy
LCC agrees with the overarching statement that the Tree Canopy is fundamental to Seattle's quality of life.
Trees perform functions such as "cleaning the air" and removing carbon. Trees provide shelter for an intricate ecosystem of urban critters and provide shade for people on hot days, and mature trees "mother" other smaller or distressed trees to maintain their health. Tree clusters prevent "heat islands" from forming and absorb storm water run-off. Seattleites espouse to be tree protectionists, but the tree canopy shrunk from 2019-2021 by 1.7%, mainly from neighborhood residential developed lots and in its Parks natural areas. Together, those 2 categories caused 78% of the canopy reduction (data taken from the City of Seattle Tree Canopy Assessment Report published 2023)
CE G 12 Seattle has a goal of 30% tree canopy (used to be by 2030??) LCC agrees that increasing the tree canopy will buffer Seattle from the adverse impacts of Climate Change. The City unfortunately lost 1.7% from 2018-2021.
LCC supports polices CE 12.1- CE 12. 9 to preserve and expand the tree canopy to 30%.LCC would also add:
CE 12.10. When will the Seattle City Council review the tree canopy data yearly to evaluate if its tree protection ordinances are ensuring that mature trees are being preserved? If the City loses more tree canopy, the Council should amend tree regulations to better preserve and meet the City's tree canopy coverage of 30%,
WATER
CE G13 LCC agrees that water is an essential resource that must be sustainably managed. How are the City's reservoirs being protected and maintained?
CW 13.1-CE 13.9 LCC supports all of the recommended policies to protect the pure water that Seattle has and find ways to clean contaminants and or reuse waste.

37-1

Healthy Food System -Food is essential for the health and well-being of our communities and healthy food options must be available to all ages and income levels throughout the City.
CE G 14 Goal that Seattle has accessibility to healthy food. LCC agrees.
CE 14.2 Support convenient access to nutritious food from a variety of sources.
What requirements and incentives will the City enact to incentivize the retention of grocery stores that supply fresh produce and protein?
CE 14.3 Not clear about “settler colonialism and racism” concerning access to food” “Can the City offer tax credits to maintain large grocers and add indigenous sources and public safety measures to prevent retail theft”?.
CE 14.4 through 14.8 LCC agrees with policies to increase food access and reduce food waste.

37-1 cont

DEIS StoryMap Comment

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Date: 5/6/2024

Comment:

ARTS and CULTURE
Cultural Spaces Place making and Place Keeping
The description (p 166) states that by 2044 Seattle's neighborhoods will have cultural spaces including theaters, galleries, cinemas, museums, music venues and art studios that reflect the rich cultural diversity in the City.
AC G 1 LCC supports the goal for all neighborhoods to have affordable cultural spaces… for people of all ages and abilities. How will the City decide with be conflict between allocating surplus public land for cultural uses when the goal of more housing is paramount?
AC 1.1-AC 1.3 LCC supports maintaining spaces for performing arts and artist studios and their housing. 38-1
AC 1.4, AC 15, AC 1.6 Encourage re-purposing of historic community buildings such as surplus schools to adapt for performance arts as well as in parks, libraries and community centers. LCC supports these policies for broad use for musicians, dance, etc., but cautions against the exclusive use of public recreational buildings exclusively dedicated long term for only one user.
AC 1.7 , AC 1.9, AC 1.10, AC 1.11, AC 1.12 and AC 1. 13 LCC supports the City grants to help local communities to preserve their cultural arts, and encourage a sense of community with murals or artwork. As those funds grow, in 20 more years, more art will be funded to install in most neighborhoods.
Public Art
Seattle was a forward-looking city and allocates 1% of its budget to support the arts including art installations.
AC G 2 LCC supports this goal of funding neighborhoods creative expression through its publicly displayed artwork to reflect a variety of cultural backgrounds.
LCC supports policies AC 2.4, 2.5, and 2.6 which encourages public participation in acquiring or commissioning artwork in the recipient communities. How will this process of procuring public art be open to the general public for their comments and focus on pieces that is easily identified as an icon or artform that represents a significant place?
Creative Economy
Seattle's downtown has a long-storied history offering a wide variety of performing arts, the Seattle Symphony, SIFF theaters, Climate Pledge Arena concerts, art galleries and world class museums. The impact of these art and cultural businesses fuel a vital the downtown night life as well as attract tourists that fuel the City economy.
AC G3 How can artists and performers who are vital to Seattle's economy be provided with affordable venue opportunities to thrive so the arts can also thrive?
AC3.1-through AC 3.11 When the City offers subsidized affordable housing units can several be allocated to provide housing and studio space for a wide range of artists?
AC 3.11 LCC supports the City's policies to reduce the risk of displacement of performers, artists and their venues as the City grows its developed footprint.
Youth Development and Arts Education

The access to all types of arts education is not guaranteed for Seattle's young students It is outreach, special parent PTA funding and City funding that makes it possible for the City's youth to participate in the arts. The seeds of creative performing expression and creating artwork is an important outlet for many students and LCC supports funding to make that accessible for EVERY child in Seattle.
AC G 4 What financial resources from Seattle can support this policy to have arts and music education in every Seattle public school?
AC 4.1, AC 4.2 and AC 4.3. LCC strongly supports forming partnerships within its resources to support access to arts for all youth.

38-1 cont

DEIS StoryMap Comment

Name: Colleen McAleer

Organization: Laurelhurst Community Club Council

Email: billandlin@aol.com

Date: 5/6/2024

Comment:

PARKS and OPEN SPACE
Seattle's residents often define their neighborhood and favorite activities by their favorite park or Public Space. WIth the past 10 years growth of 38% in employment, and the 12- year population increase of 23.5% from 2010 to 2022, local residents are feeling the "squeeze"! Fortunately, the City owned park and recreation lands are protected from conversion and a new tax for parks in 2014 adds to the City's budget allocation to more than adequately funds their capital improvements and operations. Access to Parks and Recreation and Open Space saved the sanity of many residents during the Covid-19 pandemic and mitigates the impacts of Climate Change in the future.
Equitable Provision of Public Space
P G 1 LCC supports the goal of expansion and enhanced access to public spaces as the City grows, and provide residents access to a full range of recreation for all residents
P 1.1 through P 1.18 LCC supports these general policies to serve the many needs for all ages, abilities and locations throughout the City in an equitable way.
P1 .116 "Consider the use of open space impact fees to support public space".
Who will pay these fees? It is not defined and should developers pay for some amount as a public benefit when they displace natural open space with developments?
P!..17 How can SP& R continue and expand partnering with Seattle Public Schools to including use of after school gym facilities to be run by SP&R"?
P1.19 Mitigate noise and pollution on public space is an excellent goal. How can SPR prevent nuisance noise from Seattle parks and open spaces impacts onto residential neighborhoods from the SPR activities when changing uses? Specifically what SEPA process is utilized when siting pickleball courts which emit 70 decibels of noise onto nearby homes which detracts from the restorative quieting function of the parks?
P 1.20-P1.25 LCC agrees -SP&R should restore contaminated spaces and develop new and weather protected covered spaces in an equitable way throughout the City.
P1.26 Joint use developments- How can public use mixing housing with SP&R community centers ensure public access to facilities?
Recreation, Activation and Programming
P G2 LCC supports this goal to provide a wide variety of recreational, social, activities and events for all ages and abilities
P2.1 "develop activities based on the needs of each community they serve" LCC supports this general concept but "who decides" is unclear.
When will the City re-establish "all-City" community representation using local 5- 8 person Advisory Boards with 7 city-wide District boards? Which groups now give feedback and are accountable for the recreational, social and events planned to be sure resources are distributed more equitably?
P 2.4 and 2.5 LCC supports the use of parks for nature play and use for all ages.
P 2.6 Why is the City even considering the sale of alcoholic beverages in the City's parks and Open Spaces? The impact of marijuana use and smells is already detrimental, and adding alcohol will create

39-1

drinking parties which can lead to untoward behaviors in the parks and discourage families use. Has the City considered expanding non-alcoholic drink sales?

When will SP&R build more public pool access to support the City's Initiative of "Swim Seattle".? The City is surrounded by water and every person who lives here should know the basics of how to swim for their safety.

Operations and Maintenance

P G 3 LCC supports maintenance of public space operations with eco-friendly methodology.

P 3.1 -3.7 and P 4.4 Agree with environmental sustainability practices and use the positions to train youth and homeless in skilled employment.

Partnering with Communities

P G 4 Empower community members and organizations to help shape facilities. LCC supports this as "part "of design and use, but prefers that there be a broader scale public input to design permanent public park facilities to include all ages and abilities.

P 5.1- 5.3 LCC agrees to enhance the parks' health and protect its trees, and mitigate the adverse effects of Climate Change.

39-1 cont

DEIS StoryMap Comment

Name: Colleen McAleer

Organization: Laurelhurst Community Club Council

Email: billandlin@aol.com

Date: 5/6/2024

Comment:

COMMUNITY INVOLVEMENT
Engaging all Seattle Residents Equitably
CI G 1 . LCC supports the City has numerous boards for many aspects of City life from the formal Design and Planning Commission Boards to numerous advisory boards to specific historic preservation and transportation boards which represent a significant amount of community involvement in decision making. The process is open to the public and there is a vetting process for its members diversity and relevance.
CI 1.1- 1.1.6 LCC supports inclusion of community involvement in its decision making and planning. LCC adds these comments: How does Seattle ensure transparency of access to broad community input and educate how "it works" for giving feedback in decision making. How did OPCD and SDOT "Move Seattle" proposed levy, and THIS OneSeattle Comp Plan, decide to do outreach only with the small eight groups who are all located in the south half of Seattle with one in West Seattle to shape it? 40-1
Which groups or non-profit organizations are being contacted in the explosive growth areas of downtown, South Lake Union and the dense Urban Villages north of the Ship Canal?
How can the City be more inclusive and "balance" its outreach approach to hear from more than the same "eight small group inputs" or street fair folks to capture the diverse input from all who live and work here?
Engagement Partnerships
CI G 2 LCC supports community engagement from community based partners.
LCC supports C1 2.1-CI 2.5 and adds:
When will the City re-instate funding for the Department of Neighborhoods to establish inclusive community councils and/or City Council District advisory boards? What criteria should be required to ensure these councils be open and accountable to their membership to capture input from every part of the City as a sounding board?
Building Community Capacity
CI G3 LCC supports the goal of engaging all people in the community to participate in how their city is making decisions.
C 3 3.1through C 3 3.4 LCC supports developing skill sets for all community members to participate in the City's decision making, especially in underrepresented communities.
How does City weigh "comment stuffing" as it reports about City project feedback from one-minded groups which can result in skewed influence on City policies. How does the City respect and report on the minority participants to consider the merit of all inputs?
Indigenous Engagement
CI G4 The City should include the Indigenous tribes in all major decisions about planning for the City's future needs and sustainability. LCC supports this relationship and wisdom.
CI 4.1- CI 4.9 What systematic outreach maintains treaty rights and utilizes the Tribes best practices to keep the land and ecosystem viable for the future generations?
Respectfully submitted,

DEIS StoryMap Comment

Name: Colleen McAleer

Organization: Laurelhurst Community Club Council

Email: billandlin@aol.com

Date: 5/6/2024

Comment:

GS 1.2 Encourages a variety of housing types is lofty to be inclusive and age-in-place, but is not specific. Has a real estate tax cap for seniors been studied to help predict and manage elders' tax bills so they can truly age in place?
GS 1.3 Accommodate non-residential uses in neighborhoods seems counter-productive to building housing stock when many office and commercial buildings sit empty.. How would this policy prioritize and preserve housing units?
LCC agrees with building density along existing transit routes, avoiding ECA areas and better planning for transportation, parks and recreation for new planned density areas.
Neighborhood Centers (figure 7) would be a new zoning type option to add density and comply with State bill HB 1110 which requires "middle housing" type options with 4-6 units within 1/2-mile walking distance of a major transit center. 41-1
GS 5.1 "designate Neighborhood Centers with a commercial core, diverse housing options within walking distance to shops, services and transit". LCC agrees that this best complies with HB 1110.
GS5.2 Allow all types of diverse housing types and services. LCC disagrees that it should be centered with institutional services. Larger scale services should be in Urban Centers.
GS 5.3-Zoning heights 3-6 stories . Why are 5-6 stories the goal for Neighborhood Centers, which double the existing height limits? LCC suggests heights should be 2-4 stories maximum as suggested in HB 1110 to conform to existing heights. These denser units that would better transition to existing while doubling housing units.
Why isn't there an OPCD and/or SDCI code change that Neighborhood Centers require a "Master Plan" to ensure context sensitive scale and aesthetic compatibility to adjacent existing buildings, especially residences?
Urban Neighborhoods- Seattle's neighborhoods are the heart of the City. People ask "what's your neighborhood" to start a fun conversation, and they support community building throughout the City.
GS 6.1 Designate Urban Neighborhoods primarily for residential development. LCC agrees that some areas need to be designated as quiet places to rest and enjoy, away from the noise and traffic in urban cities.
GS 6.2 Allow 4-6 stories near frequent transit. LCC disagrees and that is covered in all of the other zones, especially in Neighborhood Centers. Building 4-6 stories is out-of-scale and lacks the adequate infrastructure to build heavy density in this low density area. HB 1110 requires building more units in existing zoning to add "Middle housing" and does not call for adding heights or changing setbacks in those zones and better transitions at its edges.

DEIS StoryMap Comment

Name: Colleen McAleer

Organization: Laurelhurst Community Club Council

Email: billandlin@aol.com

Date: 5/6/2024

Comment:

LU 11.1 In the statement “range of commercial zones”. What is in the range of commercial activities? More clarity is needed to prevent incompatible development.
LU11.4 Assigns outright height limits to commercial but then allows different height limits within the zone. Are these lower height limits for transitions to existing 2-3 stories or does it mean grant higher height limits of 4-6 stories?
LU 11.2, and 11.5 state “compatible blend” of housing and commercial and suggest Neighborhood commercial limits on size and heights but does not require the necessary commercial anchor of a grocer with access to fresh produce and protein. How can access to fresh food be incentivized in OneSeattle? Over the past 10 years, NE Seattle has lost two QCF grocery stores (Roosevelt and Wedgwood), and a major Safeway on NE 45th Street while density in residential units exceeded 10,000 more residents with at least 4,000 more units awaiting permits at SDCI. Neighborhood Commercial should only occur where a significant food outlet is a key component, because residents cannot live on coffee alone. Requiring a type of Master Plan for these new Neighborhood Centers would help to guide a balanced result in services. 42-1
Neighborhood Residential Zones
LU G 12 LCC agrees with this goal to have places in the City for residential zones, which contain various housing options and accommodate a variety of households and income.
LU 12.1, and LU 12.2
LU 12.5 height limits of LR 2 -LR3 to this policy and require to be within 1/2 mile of frequent transit service.)
LU 12.3 -LCC mostly supports these uses. How does SDCI prevent and monitor adverse impacts from small institutions and at-home businesses to protect the livability of
Local Specific Regulations
LU G 14 Local regulations supporting unique conditions. LCC agrees with this goal to preserve the City’s character and support special areas of interest and special needs.
LU 14.2 and LU 14.3 Can implementation of the Master Plan process help create a variety of residential and commercial development that “use a cohesive urban design and promote high levels of environmental sustainability, housing affordability and publicly available open space”?
This approach is far superior to many of the piecemeal apartment projects that were surgically inserted into NE Seattle, on Union Bay and NE Blakeley streets. The “residential density” result is a row of cluttered market price housing units, with dumping cars on the two small side streets with no City safe and continuous sidewalks and no crosswalks for pedestrians. A “Master Plan” would have resulted in a less cluttered and poor-quality aesthetic, required developers to pay in for transportation impacts and perhaps provided better car storage, delivery truck access.

DEIS StoryMap Comment

Name: Colleen McAleer

Organization: Laurelhurst Community Club Council

Email: billandlin@aol.com

Date: 5/6/2024

Comment:

It is important to review the recent past policies that may not have achieved the expected outcomes and set a correction to achieve the goals over the next 10-year planning cycle., especially in producing more units for the lowest income AMI affordable housing residents.
The Laurelhurst Community Club Council (LCC) represents over 5,000 residents and small businesses in north Seattle, and has examined the One Seattle draft, attended the OPCD outreach meeting and shared input from many non-profit organizations.
LCC has also studied how other large cities in a growth trajectory plan to build more housing units for a range of incomes amidst their housing stock of high cost of market rate homes. Solutions vary from New York City, Vienna, Singapore and Hong Kong in building maximum units on government owned land and/buildings, partnering with private developers to build affordable units within the city (Seattle's primary model), offering federal, State and local tax cut exemptions to build more affordable units and building efficient, low cost transportation systems to enable their City's work force to live outside city limits at a lower cost of land and housing. 43-1
In keeping with One Seattle's goals of community involvement, the best example of transparency for planning and inclusion processes is the City-State of Singapore which does is publicly with a 3-D display of an updated master plan model of the entire city. As it updates development and planning, it delineates its old and new neighborhoods, location of subsidized units, and plans for "reclamation" of new land owned by the government added to its shores.
How can Seattle's OPCD become a more open planning process to all?
The One Seattle Comprehensive Plan contains noble goals and policies for the next 10+ years. However, many of them are very general and should be based upon the effectiveness of the positive outcomes of policies of the past 15 years, as well as identify the unintended consequences, and better addressing emerging trends.
Our comments below are focused on: General Goals, Growth Strategy, Land Use, Housing, Transportation, Climate and Environment, Parks and Open Space, Arts and Culture and Community Involvement:
Growth Strategy
The GS G1 Goal of creating complete communities for the inclusive needs of all ages and abilities is the overarching One Seattle Comprehensive Plan.
Major Institutions section:
LCC agrees with using the Major Institutions GS 8 Master Plan processes for managing their growth and uses that are needed within those boundaries as approved.
How will projects be considered "high quality' if SEPA and Design Review are not part of the regulatory process?
Many MHA titled housing units were built with no context to existing structures and zoning, displaced existing residents and small businesses, destroyed existing trees. Developers just wrote a check "in-lieu" into the affordable housing fund to build units far away from existing locations. "Stick trees" were planted onto right of ways and many died which deteriorated the City's tree canopy. How can Seattle

prevent these unintended outcomes and ensure “stewardship” practices for the replacement trees viability?..

LCC supports LU G 11 -the creation of Commercial zones that support surrounding neighborhoods and encourage long term stable businesses. Robust businesses serve both residents and employees and add to the vibrancy and into the City’s tax coffers.

Major Institutions

LU G15 LCC agrees that the Major Institutions are regionally important, but they must be regulated to avoid traffic, displacement and housing shortage impacts.

LCC agrees with the policies LU 15.1- LU 15.10 which are the using the tools of the Major Institution Master Plans and Major Institution Overlays. The City of Seattle is a nexus of health care and education and its needs will grow as the surrounding populations grow.

LU 15.3 LCC supports “Balance the need for the major institution to grow with the need to maintain the livability and vitality of neighboring areas”. LU 156 “ Locate major institutions where their activities are compatible with the surrounding land uses.. and where impacts associated with future development can be appropriately mitigated”.

43-1 cont

DEIS StoryMap Comment

Name: Colleen McAleer

Organization: Laurelhurst Community Club Council

Email: billandlin@aol.co

Date: 5/6/2024

Comment:

These are addendum comments we add to our overarching concern that all of the new zoning changes proposed really will not build truly "affordable Housing". Market rate will dominate and "house flipping" will just result in a 6-pack of townhouses, at a $1million a piece and are not suitable for families and seniors.

) Where is the definition of affordability that's used in the DEIS? It's often said that you can't manage what you can't measure. Without a clear definition, the City has nothing to measure against.

2} If the Plan says it implements HB 1011, and the definition of affordability in HB 1011 is clearly stated at less than 60% of AMI for renters and less than 80% of AMI for owner-occupied, why isn't this statewide definition in the Plan? **44-1**

3) In the DEIS Executive Summary, the objective for affordability is: "Increase the supply of housing to ease increasing housing prices cause by limited supply and create more opportunities for income-restricted housing." Where is the evidence that this dependence on supply-side, trickle-down housing works, or that it has worked to reduce housing costs to a level affordable to low-income people, during the past 5 to 10 years of the most extreme increases in supply of rental housing ever experienced in Seattle?

4) If you exclude fanciful supply-side housing promises, what is the likelihood that this plan will result in affordable low-income housing provided by the market?

5) Do you agree that given the state definition of affordability in HB 1110, that no new for-profit housing will be affordable without subsidies? Where does the DEIS acknowledge this? **44-2**

6) Do you agree that given the state definition of affordability in HB 1110, no new market-rate townhouses are affordable to households with incomes less than 80% of AMI, without subsidies and income restrictions? Do you agree that townhouses are the predominant form of new housing being permitted in formerly single-family zones?

7) Although HB 1110 allows duplexes, triplexes, fourplexes, sixplexes, stacked flats and courtyard apartments, what is the likelihood that any of these Middle Housing forms will be built by current for-profit infill developers, when these builders refuse to build rentals of any sort? If these forms are meant to produce rental apartments in formerly single-family neighborhoods, and non-profits have told the city that they can't build there either, because they need economies of scale for construction and staffing, where are the programs or zoning incentives Urban Residential neighborhoods?

8) What is the environmental impact of continuing to lose 1.7% of our tree canopy every five years, when 70% of our tree canopy and most of the loss is in formerly single-family neighborhoods? **44-3**

9) Where does the plan acknowledge that planting new trees takes 20-30 years to provide tree canopy, to shade houses, or to combat heat islands?

10) Where does the plan acknowledge that supply-side trickle-down housing takes 30-40 years to age into natural affordability, when a Stanford researcher who studies this determined that Seattle hadn't built enough housing 40 years ago for this to be a significant factor, when instead, Seattle tends to recycle older affordable rentals by rehabbing them into new, market-rate housing? **44-4**

11) Specifically, how many low-income affordable rentals will be built under Alternative 5? Will this be **44-5**

half of all new housing units, as called for by the Governor and the Department of Commerce? If not, what zoning and policies could mitigate the extreme lack of affordable rentals in Seattle? 44-5 cont

12) Several years ago, the City redefined "family-sized housing" as 2 bedrooms, rather than 3 bedrooms. How has that change contributed to the lack of family-sized rental housing being built, and what would be the effect of restoring the definition of family size to the common understanding of 3 bedrooms? 44-6

13) What zoning tools are available, including MHA, to require more family-sized 3-bedroom rental housing at all income levels? 44-7

14) Where does the housing plan acknowledge the needs of seniors and people with disabilities for accessible housing without stairs? How can the plan incentivize stacked flats and courtyard apartments? Wouldn't such forms mean one-third to half the apartments would be ground-floor accessible apartments? Could these apartments be built by non-profits with the benefit of land trusts funded by the City? 44-8

15) What is the effect of lacking 11,000 blocks of sidewalks on our vision of a 15-minute city? On accessibility for seniors, people with mobility aids, baby strollers and ADA requirements? How can we include and fund a plan for a complete sidewalk grid within 20 years? 44-9

16. Master plans are needed to be certain that all income levels and abilities are met and a master fund portion goes to sidewalks and amenities for all types of priced housing. 44-10

DEIS StoryMap Comment

Name: Chris Aggerholm

Organization: Grousemont Associates, QA Canal LLC - 3837 13th Avenue W

Email: chrisa@grousemont.net

Date: 5/6/2024

Comment:

Thank you for your efforts in reviewing options for additional density where it makes sense and addressing Seattle's long term needs for housing in a thoughtful manner. We own several properties in Seattle including one at 3837 13th Avenue West which we will expect to be redeveloped into housing as the site nears the end of its useful life. We were only just notified by our architect of a May 6 date to submit comments otherwise would have prepared something more formal, however we would like to be sure and support any additional density in this unique area that is just off the Ballard Bridge between SU. any additional density in this zoning can make development more achievable by allowing us to build more cost effectively - we also have a split zoning that is odd and probably not a reason for this to be in place any longer. This corridor, to include Elliott Avenue/ 15th is a great future area for development being so close in to the City center but provides nice benefits with view of the water as well as related amenities that tenants like. We own an additional 2.5 acres on Elliott however this was recently rezoned to Industry and Innovation. We would love to have this allow for residential but expect this will take some time to alter - if ever. Again thank you for your leadership in this process.

45-1

Letter 46

From: Laura Baumgartner
To: PCD_CompPlan_EIS
Cc: Moore, Cathy; Morales, Tammy; Strauss, Dan; Carroll, Patrice; Hubner, Michael
Subject: feedback on the comp plan draft eis
Date: Saturday, April 13, 2024 4:00:19 PM

CAUTION: External Email

Mr. Holmes,
I'm writing with feedback on the draft comprehensive plan and specifically on the EIS that is available at the
website https://storymaps.arcgis.com/collections/bc280a13a8ee4db28cd4d602ffe69336?item=1.

I'm a resident of Seattle. I live in the Central District and have for 23 years. I am a former public school teacher and now serve as pastor at the Haller Lake United Methodist Church in north Seattle. I have a deep concern for making Seattle a place where teachers can afford to live, as I have been able to do, and also a place where people who can afford even less than teachers have a welcoming place of belonging and are not cast out and excluded, or forced to live in cars or on the streets. As you know, we have many low income residents as well as asylum seekers, refugees, and other immigrants arriving in the Seattle area regularly all struggling to find shelter. The churches are rising to the occasion, but need help meeting the need. The Zoning changes happening with the Comprehensive plan is one way to provide help. 46-1

Our congregation is in the midst of a discernment process that is leading us toward building housing on our property at 133rd and 1st Ave. NE. We have talked with neighbors and community leaders in our area. We have met with city representatives and government officials. We have partnered with community organizations and grass roots organizers. What we are hearing is that there is widespread support for more dense housing in the area, especially on our property. We see the possibility for that kind of development in Alternative 5 of the EIS and support moving in the direction of more dense housing throughout the city.

However, we also know from experience, and hear repeatedly from our neighbors, that the neighborhood around our proposed project is sorely lacking in small businesses and options for gathering, shopping, and creating community. Therefore, we would like to be able to consider creating such a space in the development on our property when we are ready to partner with a developer. None of the alternatives in the DEIS currently allow for commercial or mixed commercial and residential development on our corner. **We would like to request that the DEIS be revised to include NC2-55 zoning for the church property, Lots 3, 4 and 5, of block 65, in the H.E. Orr Park Division No. 6** so that a development might be considered that includes both commercial and residential components.

We are still in the beginning phases of planning. We don't have a developer yet but we have talked with several possible developers and have heard that the zoning, current and projected by the DEIS, limits their ability to dream with us about how we might become community with neighbors who aren't here yet.

Please consider this request and be part of our dream to build a community with space for all.
Thank you,
Pastor Laura Baumgartner (she/her)

Haller Lake United Methodist Church
13055 First Ave. NE
Seattle, WA 98125
Cell: 206-595-9607

Letter 47a

BELLWETHER HOUSING

Office of Planning and Community Development
Seattle City Hall
600 4th Avenue, 5th Floor
Seattle, WA 98104
Attn: Jim Holmes; Rico Quirindongo
PCD_CompPlan_EIS@seattle.gov

May 6, 2024

Re: Support for additional residential height and density at Kingway site, 5952 Martin Luther King Jr. Way South (Parcels 8113100005 and 8113100040)

Dear Mr. Quirindongo,

Thank you for the opportunity to comment on the One Seattle Comprehensive Plan Draft Environmental Impact Statement ("DEIS"), as well as the Draft One Seattle Plan.

Established in 1980, Bellwether Housing has been a pioneering force in Seattle's affordable housing landscape. As the largest nonprofit affordable housing provider in Seattle, Bellwether Housing manages over 3,500 apartments across 41 buildings, serving over 7,500 residents. Our mission is to create stable and equitable communities by developing and managing affordable homes for individuals and families with low incomes. We commend the commitment to affordable housing and the other values articulated in the draft One Seattle Comprehensive Plan.

47a-1

Given our mission, we are eager to see allowances for additional residential development across Seattle – particularly in areas in close proximity to light rail, where many of our buildings are located. We firmly believe that increasing affordable housing capacity in transit-oriented areas is essential for addressing Seattle's housing affordability crisis and fostering a more inclusive urban environment.

Bellwether owns and operates the Kingway Apartments, an existing affordable housing community located at 5952 Martin Luther King, Jr. Way South (parcels 8113100005 and 8113100040) (the "Property"). The Property is split-zoned Midrise and Neighborhood Commercial 2 with a 55' height limit (MR and NC2-55). The Property is within walking distance of a future light rail station and represents a significant opportunity for many more affordable housing units to be developed on the site. Accordingly, we encourage OPCD to include in the FEIS a study of heights and densities commensurate with NC zoning on the entire site, with height limits up to 125'. In addition, we

encourage the City to look at sites such as these and ensure that as part of implementation of the Comprehensive Plan, they are not split zoned. Split zoning creates hardships for redevelopment, and redevelopment that includes affordable housing in this area should be encouraged.

Finally, we encourage the implementation of the Comprehensive Plan in areas like these to be completed as soon as possible. We are aware that the City will focus on Regional Center subarea plans, but opportunities for affordable housing density, such as this one, which is outside of Regional Centers, should not be overlooked.

47a-1 cont

We would be pleased to collaborate with your department as may be helpful in future implementation on this site. Thank you again for receiving our comments.

Sincerely,

Susan Boyd, Chief Executive Officer
Bellwether Housing

BELLWETHER
HOUSING

Office of Planning and Community Development
Seattle City Hall
600 4th Avenue, 5th Floor
Seattle, WA 98104
Attn: Jim Holmes; Rico Quirindongo
PCD_CompPlan_EIS@seattle.gov

Re: Support for additional residential capacity for parcel #3226049579

Dear Mr. Quirindongo,

Thank you for the opportunity to comment on the One Seattle Comprehensive Plan Draft Environmental Impact Statement ("DEIS"), as well as the Draft One Seattle Plan.

Established in 1980, Bellwether Housing has been a pioneering force in Seattle's affordable housing landscape. As the largest nonprofit affordable housing provider in Seattle, Bellwether Housing manages over 3,500 apartments across 41 buildings, serving over 7,500 residents. Our mission is to create stable and equitable communities by developing and managing affordable homes for individuals and families with low incomes. We commend the commitment to affordable housing and the other values articulated in the draft One Seattle Comprehensive Plan.

47b-1

Given our mission, we are eager to see allowances for additional housing development across Seattle – particularly at properties owned by institutions where we see partnership opportunities. Education, widely recognized as the pathway to economic mobility, remains elusive for many. We firmly believe that increasing housing capacity adjacent to educational institutions will reduce educational disparities, create job opportunities, and contribute to addressing Seattle's housing crisis.

Bellwether is working with North Seattle College to develop the underutilized southwest corner of campus as affordable housing. The site is served by frequent transit arterials on College Way N and NE 92nd Street and benefits from the John Lewis Memorial bridge connection to the Northgate Light rail Station. The bridge was constructed to increase the light rail walkshed and currently serves the campus and higher density properties to the north of the bridge.

The One Seattle Plan future land use map shows campus and the subject property zoning unchanged along with two blocks of new Urban Neighborhood

positioned between the Northgate Regional Center and the Aurora Licton Springs Urban Center. The college already operates under a MIMP allowing increased scale beyond the underlying LR1 and LR3 split zoning of the development parcel. The development site creates an opportunity for housing to provide a transition in scale from the campus to the Urban Neighborhood.

We are writing to request you study an expansion of the Northgate Regional Center and include the area underlying the North Seattle College MIMP into the One Seattle Preferred Action. The development site supports plan policies for creating opportunities around higher education, adding density adjacent to frequent and alternative transit, mitigating displacement of current residents and businesses, eliminating split zoned sites, and transitioning between areas varied intensity uses.

47b-1 cont

We would be pleased to collaborate with your department as may be helpful in future implementation on this site. Thank you for considering our comments.

Sincerely,

Susan Boyd, Chief Executive Officer
Bellwether Housing

McCULLOUGH HILL PLLC

May 3, 2024

OPCD
Seattle City Hall
600 4th Avenue, 5th Floor
Seattle, WA 98104
Attn: Jim Holmes, Rico Quirindongo
PCD_compplan_EIS@seattle.gov
OneSeattleCompPlan@seattle.gov

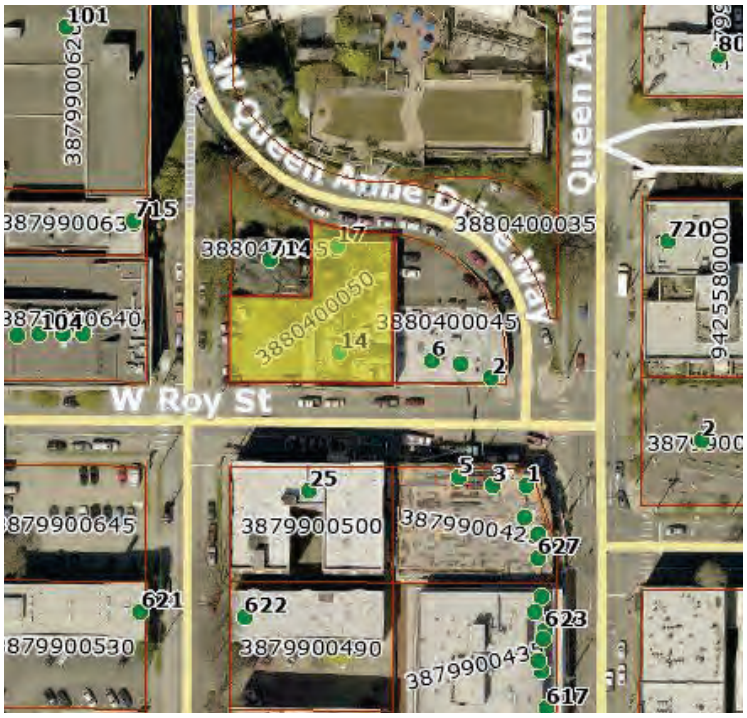
Re: **Support for Alternative 5, request to study SM-UP zoning with heights of 85-125 feet at 14 West Roy Street**

Dear Mr. Quirindongo,

Thank you for the opportunity to comment on the One Seattle Comprehensive Plan Draft Environmental Impact Statement ("DEIS").

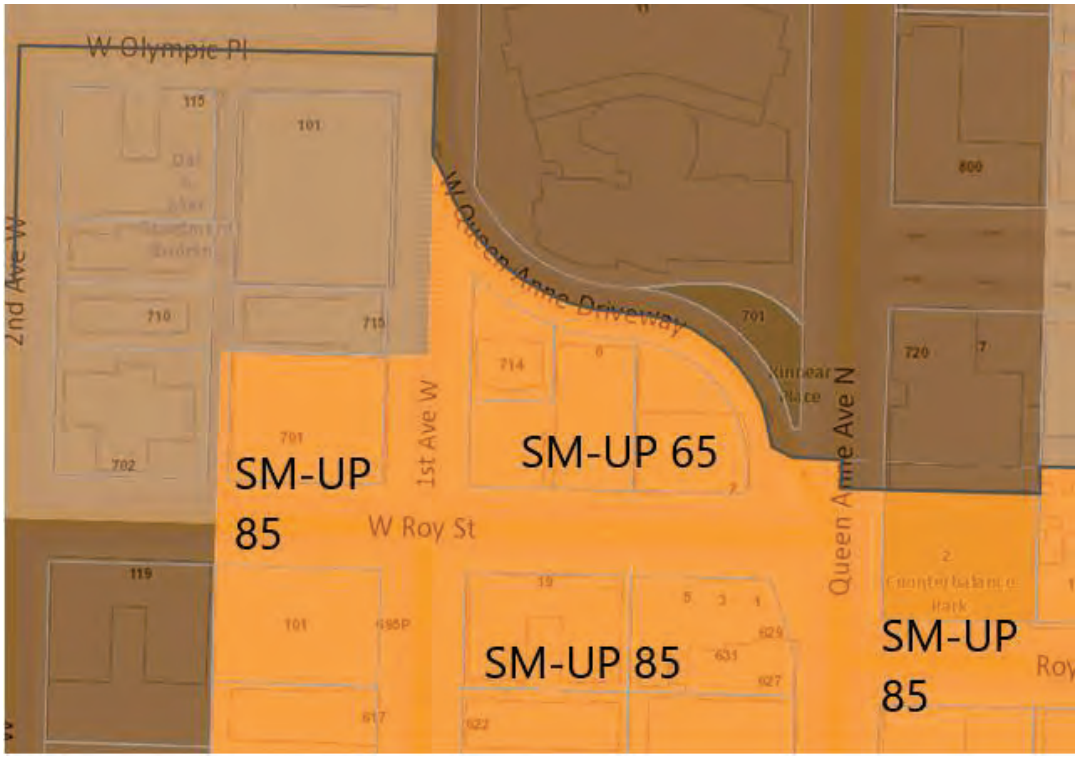
West Roy LLC owns the property at 14 West Roy ("Property") in the Uptown neighborhood, currently used for warehousing and retail purposes. We write to express support for Alternative 5, but request the Final Environmental Impact Statement ("FEIS") study expansion of the Uptown Urban Center further to the north and an increase in minimum urban center height limits to 85 and 125 feet. More designated urban centers and greater heights within these areas will facilitate the residential and commercial capacity that our neighborhood needs to thrive. 48-1

The Property is 12,035 square feet in size and is currently improved with a two-story warehouse and retail building, along with surface parking. It is located within a block of a multi-line bus stop served by the D Express, and it is across the street from Counterbalance Park in a neighborhood full of varied commercial and residential uses.



The Property is currently zoned SM-UP 65(M1) and is located along the northern boundary of the Uptown Urban Center, as shown below. The blocks to the south, west, and east of the Property are zoned SM-UP 85(M1). The Property's current zoning, therefore, is inconsistent with that of its neighbors and with the density-promoting policies of the urban center designation. It would better facilitate the goals of the One

Seattle Plan to establish a minimum zoned height limit for urban centers of at least 85 feet, and preferably of 125 feet to allow for mass-timber construction. We request the City study zoning assumptions that would establish these height limits for urban centers generally, and on the Property in particular, as part of the Comprehensive Plan update.



In addition to increases in zoned height, we urge the expansion of the Uptown Subarea boundary to the north and request that the FEIS study an expansion beyond that contemplated by Alternative 5. This expansion would promote greater commercial vitality and better integration with surrounding residential neighborhoods. An extension of the subarea will facilitate a more cohesive and inclusive approach to planning and development, allowing better integration of Uptown and Lower Queen Anne with the surrounding residential neighborhoods and creating an even more vibrant and thriving urban district.

Along the same lines, we strongly advocate for the rapid completion of the Uptown Subarea Plan to ensure comprehensive and effective planning. Uptown, with its prime location, distinctive retail character, and numerous cultural amenities, is poised for growth that furthers the policies of the One Seattle Plan. It is imperative that the subarea plan is finalized promptly to provide clear guidance and direction for future development initiatives, ensuring that growth is managed responsibly and aligned with community aspirations.

48-1 cont

Please do not hesitate to contact us if we can provide any additional information about the above.

48-1
cont

Sincerely,

Jessica M. Clawson

On behalf of West Roy LLC

McCULLOUGH HILL PLLC

May 6, 2024

Office of Planning and Community Development
Seattle City Hall
600 4th Avenue, 5th Floor
Seattle, WA 98104
Attn: Jim Holmes; Rico Quirindongo
Email: PCD_CompPlan_EIS@seattle.gov

Dear Mr. Quirindongo,

Thank you for the opportunity to comment on the One Seattle Comprehensive Plan Draft Environmental Impact Statement ("DEIS").

Nicola Wealth ("Nicola") owns the property located at 155 NE 100th Street and 9725 3rd Avenue NE ("Property" shown at right), the block directly south of the Northgate light rail station. We write to express support for Alternative 5, but request the Final EIS and Northgate Regional Center Subarea Plan study 240 feet in height feet in height on the Property. Nicola has conducted feasibility studies for residential towers on the Property under the current zoning, but redevelopment is more feasible with additional height. The City should maximize development capacity for residential towers so close to the light rail to fulfill its vision for Regional Centers, and achieve housing production goals.

49-1

We believe 240 feet in height this close to light-rail is wholly consistent with the Regional Center concept articulated in the Draft EIS. Based on the Draft EIS, the City will continue to rely heavily on Regional Centers to achieve 120,000 new housing units. Under Alternative 5, the highest percentage of new housing units is directed towards Northeast Seattle (Area 2). We support the Regional Centers strategy as articulated in Alternative 5, but if that is the case, the Property is a key opportunity to maximize housing unit delivery. Additionally, the FEIS should consider that sites like the Property with existing office towers will require significant resources to redevelop. Additional development capacity supports redevelopment feasibility.

The Property consists of two lots that are 151,549 square feet 139,861 square feet respectively. It is developed with three office buildings constructed in 1974 and 1979, and abundant surface parking. It is surrounded by other commercial uses. It is currently zoned SM-NG 145, with height limited to 145 feet. We request the FEIS and Northgate Subarea Plan study zoning consistent with the block to the north, SM-NG 240, which allows for 240 feet in height.

Given the City's dire need to address housing affordability, the City should optimize larger sites like the Property and remove unnecessary height constraints.

The existing Comprehensive Plan and zoning seek in part to transform larger, auto-centric blocks in Northgate into a dense, pedestrian-friendly environment. But redevelopment of larger, developed sites like the Property entails multiple complex leasing considerations, and requires significant investments over a longer period of time. Significant pedestrian-oriented and street improvement, MHA fees, and desired urban amenities all add to the cost of transformation of larger sites in Northgate, and ultimately the cost of housing. The Comprehensive Plan Update should recognize these challenges and seek opportunities to maximize height in in the Northgate Regional Center wherever possible. We also recommend the City recalibrate MHA fees in Northgate to align with current land values.

49-1 cont

We share the City's ambitious vision for Northgate to lead in new housing production, and break down the larger-scale, driving-centric blocks that currently predominate this area. For this vision to materialize, we request the FEIS and Northgate Subarea study 240-foot height in this location.

Please do not hesitate to contact me if we can provide any additional information.

Sincerely,

/s

Jessie Clawson

McCULLOUGH HILL PLLC

May 6, 2024

VIA EMAIL

Office of Planning and Community Development
Seattle City Hall
600 4th Avenue, 5th Floor
Seattle, WA 98104
Attn: Jim Holmes
PCD_CompPlan_EIS@seattle.gov

Re: Support for additional height studied in UI U/45 zone to accommodate additional residential capacity as permitted in Industrial and Maritime Strategy

Dear Mr. Holmes,

Thank you for the opportunity to provide feedback on the One Seattle Comprehensive Plan Draft Environmental Impact Statement ("DEIS").

I write on behalf of Aleutian Spray Fisheries, an existing industrial maritime business and property owner that owns property located at 2157 N. Northlake Way ("Property"). The property is zoned Urban Industrial with a height limit of 45 feet ("UI U/45"). As you are aware, the City's recent amendments to implement the Industrial and Maritime Strategy allow a limited amount of workforce residential development in the UI/U 45 zone. As a longtime industrial maritime business, Aleutian feels strongly that more workforce housing is needed in Seattle, ensuring that workers at Aleutian can afford housing close to their workplace. Our maritime and industrial workers are facing the same housing affordability challenges as others seeking workforce housing rental opportunities in Seattle. It should be noted the property is outside of the BINMIC and within steps of Gas Works park and the Burke Gilman Trail, as well as dozens of other multifamily housing projects.

50-1

Following implementation of the UI/U 45 code amendments, Aleutian investigated whether residential development is possible with a height limit of 45 feet, given the constraints created by the shoreline environment on the property. From a zoning and economic perspective, a residential building limited to 45 feet will not be feasible, thereby ending any hopes Aleutian has of providing housing on its property. We therefore request that OPCD study in the FEIS a height limit of 65 feet for residential uses in the UI/U-45 zone on Aleutian's sloped property between Waterway 19 and the Sunnyside Avenue N Boat Ramp. The addition of housing in this location is consistent with the OneSeattle Plan's main goal of expanding housing opportunity throughout the City and addressing our housing affordability crisis. The additional height in this area corresponds to the natural slope, ensuring that upland views will not be impacted by the height—creating a win/win for the existing neighborhood and additional residential density.

Thank you for considering my input and please do not hesitate to contact me should you have any questions.

Sincerely,

Jessica M. Clawson

McCULLOUGH HILL PLLC

May 6, 2024

Jim Holmes
City of Seattle OPCD
600 4th Avenue
Seattle, WA 98104

Re: Lee Johnson DEIS comment letter

Dear Jim:

Thank you for the opportunity to comment on the One Seattle Comprehensive Plan Draft Environmental Impact Statement ("DEIS"). We represent Lee Johnson, who owns several properties in Northeast Seattle, generally in Roosevelt, Lake City, and north of Wedgewood. They consist of the following:

- **7210 Roosevelt Way NE.** Zoned NC2-55(M) and in commercial use (doctor's offices). Located in Roosevelt Residential Urban Village. Located on the SE corner of NE 73rd Street and Roosevelt Way NE. Shares property line with LR1 zoned property. RUV is current FLUM designation.
- **1008 NE 72nd Street.** Zoned LR1(M1) and currently in single family use. Located in Roosevelt Residential Urban Village; RUV is current FLUM designation.
- **8040 16th Avenue NE**. Split zoned NR3 and C1-55(M). Currently in single family use. Not located in an urban center or urban village. Designated "neighborhood residential" in the current FLUM.
- **8100 Lake City Way NE**. Zoned C1-55(M). Currently the Lake City Mazda Showroom. Directly adjacent to neighborhood residential zoned property and uses. Not located in an urban center or village. Designated "commercial/mixed use" in current FLUM.
- **8010 15th Avenue NE**. Zoned NC2-55(M). Currently an auto repair and detailing shop. Not located in an urban center or village. Designated "commercial/mixed use" in current FLUM.
- **8215 Lake City Way.** Zoned C1-55(M). Currently in use as a car storage/sales lot. Not located in an urban center or village. Designated "commercial/mixed use" in current FLUM.
- **9105 Lake City Way NE**. zoned C1-55. Currently an auto sales lot. Not located in an urban center or village. Adjacent to neighborhood commercial zones. Not located in an urban center or village. Designated "commercial/mixed use" in current FLUM.
- **9418 35th Ave NE**. Zoned NC1-40(M). Current use is auto repair. Surrounded by other Nc1-40 zoned properties. Not located in an urban center or village. Designated as "commercial/mixed use" in FLUM.
- **8064 Lake City Way NE.** Zoned NC2-55(M). Currently used as Mexican food restaurant. Not located in an urban center or village. Designated "commercial/mixed use" in current FLUM.

51-1

Lee Johnson supports Alternative 5 as the alternative that includes the most growth in the City, particularly along the Lake City Way/15th Ave NE corridors, where most of these properties are located. Lee Johnson supports the additional density that would be added along corridors in Alternative 5. We would appreciate the following to be studied in the Final EIS, as it pertains to Lee Johnson's properties:

- Lake City Way is one of the few remaining truly commercial corridors in the City of Seattle, and it should be utilized and protected for commercial uses.
- In the DEIS, please study the impacts of the C1-75 zone for all properties stated above.
- The DEIS in all Alternatives places more than half of the new commercial growth in Downtown Seattle. While Lee Johnson supports Downtown Seattle, it may be advisable to study an alternative that places more housing in Downtown, and places more commercial uses/jobs in the neighborhoods, to create more of a jobs/housing balance in both Downtown and the neighborhoods. Doing so will enliven Downtown in the evenings, and will add more diversity of uses to neighborhoods like Lake City.
- Additional analysis should be done that shows the growth that will be directed towards commercial corridors such as Lake City, 15th Avenue NE, and Roosevelt. Currently "activity units" are only measured in the DEIS in urban centers and villages.
- The DEIS contemplates height limits up to 55 feet in corridors, plus more in existing MF or C zones. Placing additional height on existing C and MF zones reinforces the existing urban form in Lake City, Roosevelt, and on 15th, which is a very narrow strip of commercial uses and height along the arterial, transitioning often in a lot line condition to neighborhood residential. To create better transitions, consider rezoning much larger and deeper swaths of the corridor to commercial zones—this eliminates the awkward and sometimes impactful transitions that occur when C zones and NR zones directly abut each other. As an example, the parcel located at 8038 16th Avenue NE should be rezoned to commercial, as should the rest of the block.
- Another benefit of deeper/wider C zones along corridors is more commercial uses will move to the area because there will be more commercial space. This will create more of a commercial "hub," which the City has been losing as the Stone Way corridor, the Roosevelt corridor, the Rainier Avenue corridor, and the 15th Ave NW/Holman Road corridors are redeveloped into mixed use projects which often do not allow for the flexibility of uses that true commercial/heavy commercial uses need.
- In implementing the Comprehensive Plan, the City should utilize its own general rezoning principles stated in SMC Chapter 23.34, which state that generally physical buffers (such as streets and sometimes alleys) should serve as the zone boundary transition.
- Several split zoned conditions exist along Lake City, including on the 8040 16th Avenue NE parcel (split zoned C1 and NR). Split zoned conditions should be cleaned up and eliminated in the implementation of this Comprehensive Plan.

51-1 cont

Pertaining to the Draft One Seattle Plan, we have the following comments:

- The Connected Communities concept should focus on job creation in places where people already live (like NE Seattle), to reduce commute times and reduce greenhouse gas emissions. Consider adding more jobs/commercial zoning to the corridor areas, including

51-2

the properties stated above. Lee Johnson has been able to retain approximately 50 living wage jobs in the area and has prevented owners of Mazda vehicles from having to triple or quadruple their emissions when buying and servicing their vehicles by maintaining a presence in this area. By expanding zoning to allow uses such as auto repair and sales, this would only further increase these numbers.

- Please add a Growth Strategy that discusses commercial uses and commercial zones. Currently, it appears there is no Growth Strategy for job growth that would be directed toward existing or new commercial/neighborhood commercial zones. Jobs in traditional heavy commercial zones (C1, C2) are often well paying, family-wage jobs.
- Consider the creation of a new Neighborhood Center along the Lake City Way corridor between the Lake City Urban Center and the Roosevelt Urban center. While Lake City Way does not yet have frequent transit service, it is a corridor that is well-suited and primed to receive transit. Do not make the mistake of failing to zone an area due to current lack of transit, only to be behind when Lake City does receive transit service.
- Policy LU 1.3 should be edited to read: <u>Zone areas and</u> apply development standards such that new uses and buildings protect public health and safety and minimize impacts on adjacent homes and businesses. (This change is meant to reflect the fact that the first step in minimizing impacts is to appropriately zone areas, so that C zones do not directly abut NR zones).

51-2 Cont

We appreciate the opportunity to comment and look forward to implementation of the One Seattle Plan.

Sincerely,

Jessica M. Clawson

From: Jessica Clawson
To: Isaac Patterson; PCD_CompPlan_EIS; OneSeattlePlan@seattle.gov
Cc: Holmes, Jim
Subject: RE: 70th & Greenwood Ave LLC One Seattle Plan DEIS comment letter
Date: Monday, May 6, 2024 3:01:22 PM

CAUTION: External Email

Also adding the OneSeattle email address, in case it's not all the same! Thanks.

Jessica M. Clawson
McCullough Hill PLLC
701 Fifth Avenue, Suite 6600
Seattle, Washington 98104
Direct: 206-812-3378
Cell: 206-313-0981
jessie@mhseattle.com
www.mhseattle.com

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From: Isaac Patterson <ipatterson@mhseattle.com>
Sent: Monday, May 6, 2024 2:52 PM
To: PCD_CompPlan_EIS@seattle.gov
Cc: Jim.Holmes@seattle.gov; Jessica Clawson <jessica@mhseattle.com>
Subject: 70th & Greenwood Ave LLC One Seattle Plan DEIS comment letter

52-1

Hi Jim and OPCD,

Please see the attached comment letter on behalf of 70th & Greenwood Ave LLC and Jessica Clawson.

Thank you,

Isaac Patterson

Isaac A. Patterson
Attorney at Law
McCullough Hill PLLC
701 Fifth Avenue, Suite 6600
Seattle, Washington 98104
Direct: 206.812.6961
Cell: 206.445.8342
ipatterson@mhseattle.com
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McCullough Hill PLLC

May 13, 2024

VIA EMAIL

Office of Planning and Community Development
Seattle City Hall
600 4th Avenue, 5th Floor
Seattle, WA 98104
Attn: Jim Holmes
PCD_CompPlan_EIS@seattle.gov

RE: Comments on the Draft One Seattle Plan

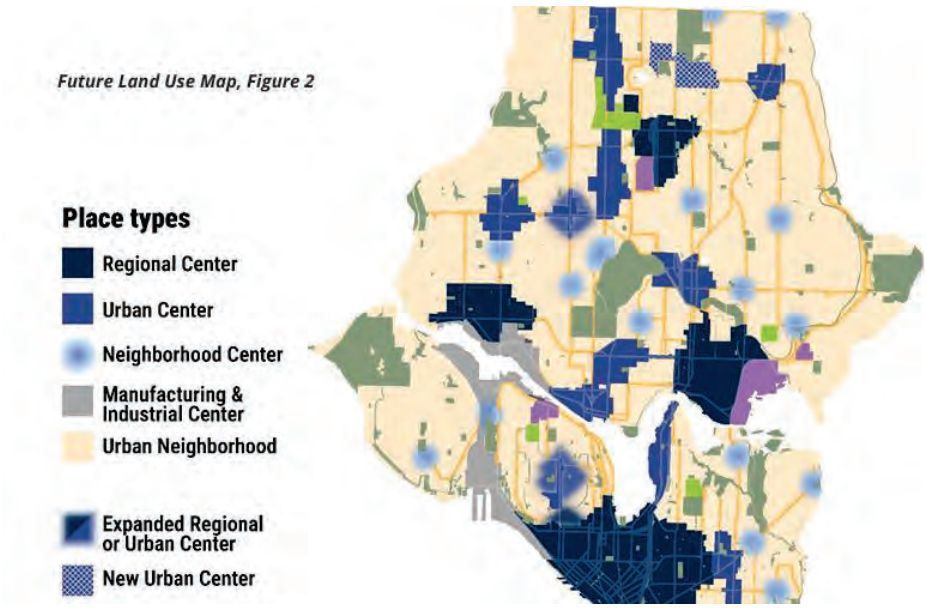
Dear Mr. Holmes,

Thank you for the opportunity to comment on the One Seattle Comprehensive Plan Draft Environmental Impacts Statement ("DEIS") and One Seattle Comprehensive Plan: Draft for Public Review ("Draft Plan Update").

70th & Greenwood Ave LLC owns four contiguous parcels at 7010 Palatine Avenue North and 7009 Greenwood Avenue North (collectively, "Property") in the Phinney Ridge neighborhood. The most significant portion of the Property includes an innovative, multi-use building that hosts multiple floors of apartments above a variety of local hospitality businesses at street level.

We write to express support for Phinney Ridge's continued evolution as a complete and walkable neighborhood. To that end, we support the continued inclusion of Policies GS 5.1 in future versions of the Plan Update and EIS. The thriving and lively streets of Phinney Ridge, whether during the day or the evenings, demonstrate the overwhelming demand for walkable neighborhood businesses and housing that are well-served by frequent transit. We encourage the City to designate a Phinney Ridge Neighborhood Center on the Plan's Future Land Use Map that reflects the unique linear nature of the Greenwood-Phinney Ridge commercial corridor consistent with Policy GS 5.4 ("Determine boundaries of Neighborhood Centers based on local conditions…") Because the Phinney Ridge commercial corridor stretches from 85th Avenue North to Woodland Park Zoo and includes the heavily used #5 bus route, we ask the City to recognize that the neighborhood has multiple "central intersections" that should be included in a Neighborhood Center designation. Such recognized central intersections should include, at a minimum, both street sides between the intersections of North 67th Street and Phinney Avenue North to the south and Greenwood Avenue and North 73rd Street to the north. 53-1

We additionally request that the entire Property be included within a Phinney Ridge Neighborhood Center similar to that depicted in the image below, taken from page 20 of the Draft Plan Update.



The Property's inclusion in such a Neighborhood Center would support all four of the Draft Plan Update's proposed policies for Neighborhood Centers.

The Property's inclusion in a Neighborhood Center designation would support Policy GS 5.1 because the Property already hosts "diverse housing options" that "allow more people to live within walking distance of shops, services, transit, and amenities." Indeed, the primary building on the Property contains multiple floors of both ownership and rental housing above a variety of locally owned small businesses, all of which are well-served by nearby transit.

The Property's inclusion in a Neighborhood Center would support Policy GS 5.2 for the same reasons, and the Property contains no "major office developments."

53-1 cont

Policy GS 5.3 expressly states, "Zoning in Neighborhood Centers should generally allow buildings of 3 to 6 stories, especially 5- and 6-story residential buildings to encourage the development of apartments and condominiums." Needless to say, the Property and its 5-story mixed-use apartment building already embody this Policy. Thus, the Property's inclusion within a Phinney Ridge Neighborhood Center would strongly support the proposed version of Policy GS 5.3.

Lastly, the Property's inclusion in a Neighborhood Center is warranted based on Policy GS 5.4 because it is within 800 feet of the intersection of North 73rd Street and Greenwood Avenue North.

For the preceding reasons, we respectfully ask that future versions of the EIS include the study of all potentially significant environmental impacts that could result from either the creation of a Phinney Ridge Neighborhood Center or the Property's inclusion in such a Neighborhood Center.

53-1
cont

Thank you again for providing the opportunity to submit these comments. Please do not hesitate to reach out should you have any questions.

Sincerely,

Jessica M. Clawson

Letter 54

Matt Cramer
4709 9th Ave NE
Seattle, WA 98105

May 1, 2024

By Email Only

Office of Planning & Community Development
City of Seattle
P.O. Box 94788
Seattle, WA 98124-7088
oneseattlecompplan@seattle.gov;
PCD_compplan_EIS@Seattle.gov

Re: *Comments to One Seattle Plan and its EIS: 9th Avenue Northeast and Area Midrise (MR) Opportunity*

Dear Office of Planning & Community Development:

I appreciate the opportunity to comment on the Draft One Seattle Plan ("Draft Plan") and the related Draft Environmental Impacts Statement ("DEIS"). This letter requests an upzone to Midrise (MR) zoning (and a complimentary redesignation on the future land use map) for my home and neighborhood, so that we can do our part to support the Mayor's One Seattle Plan by contributing new housing to our community.

I request that this Midrise (MR) upzone and redesignation be included in the scope of the FEIS study and executed by the Mayor's Final Recommended Plan and its proposed implementing ordinances.

A. Background: Unintended Consequences under Current Code.

I live at 4709 9th Avenue NE, APN 0889000030, which is depicted and marked with a small grey spot at right.

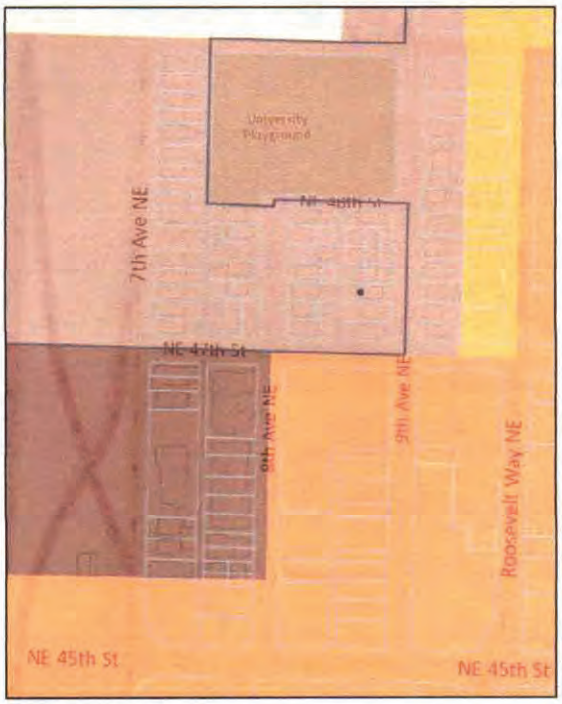


Figure 1. Current zoning surrounding my property. Light brown is low-rise, mustard yellow is neighborhood commercial, orange is Seattle Mixed, and darker brown is mid-rise.

54-1

My home is zoned LR1, but is located just outside of the current University District Urban Center (which the Draft Plan proposes transitioning into a "Regional Center"), and just one block north of SM-U 95-320 (M1) zoning (and a tower of more than 200 feet, with further 60-foot buildings immediately west of that. As you can see, the area that includes my home also is very well served by frequent transit and other vibrant urban services on Roosevelt and at 45th. The University Playground is another immediately adjacent gem that should be accessible to more housing units.

Unfortunately, as of now the Mayor's Draft Plan proposes to leave my home, block and neighborhood relegated to "Urban Neighborhood" future land use designation, where dense housing more appropriate to this location is effectively prohibited. The currently proposed future land use redesignation could conceivably drive density ***downward*** as compared to the Multi-Family Residential Area future land use designation that is effective today.[1] That result flies in the face of the Mayor's goals.

Under the vision set forth by the Mayor and the policies set forth in the One Seattle Plan, my home and neighborhood would be a fantastic place to create badly needed Midrise (MR) housing density at market rents, affordable rents, or a mix. It is no longer a fit for Lowrise zoning, and certainly not a fit for an Urban Neighborhood future land use designation.

54-1 cont

I have watched with pride as the neighborhood has grown up into a bustling area of midrise apartments around me. It is also notable that an upzone to MR for my home and neighborhood would help provide great housing capacity *in a location where displacement will be minimal,* due to a high population of undergraduate and graduate students who generally are rotating in and out of the neighborhood on a yearly (if not quarterly) basis. In light of comprehensive transit and parks investments, together with the general urban maturation of the University District, my home and neighborhood's current Lowrise zoning status is outdated, artificially constraining the transit-oriented density and affordability that properties like mine could provide. I request the following:

- **The Mayor's zoning implementation map (which I understand is to be introduced in draft later this summer) should propose rezoning this area to Midrise (MR).**
- **The Mayor's Final Recommended Plan should include this area within the adjacent Regional Center future land use designation, or *at a minimum*, the Corridor future land use designation studied in the DEIS and initially proposed in the OPCD staff draft.**
- **The Final EIS should study inclusion of this area within the adjacent Urban Center (soon to be renamed "Regional Center"), and should study an upzone of this area to, *at a minimum*, Midrise (MR) zoning.**

---

[1] *See* 2022 Comprehensive Plan at page 41.

Thank you for all your work on the One Seattle Plan. My neighborhood stands ready to work with you in making our community's housing goals a reality.

54-1 cont

Sincerely,

Matt Cramer

CC: Rico Quirindongo
Marco Lowe
Council President Sara Nelson (At-Large)
Councilmember Maritza Rivera (District 4)
Councilmember Tanya Woo (At-Large)
Councilmember Tammy Morales (Land Use Committee Chair; District 2)

May 6, 2024

VIA EMAIL

Office of Planning and Community Development
Seattle City Hall
600 4th Avenue, 5th Floor
Seattle, WA 98104
Attn: Jim Holmes
PCD_CompPlan_EIS@seattle.gov

Re: Support for Alternative 5 and additional height and density studied in small parcels zoned NC-55 to encourage development and create a workable Mandatory Housing Affordability program.

Dear Mr. Holmes,

Thank you for the opportunity to provide feedback on the One Seattle Comprehensive Plan Draft Environmental Impact Statement ("DEIS").

I am an owner/partner of four sites currently zoned NC-55, at 2514, 2518 and 2616 East Cherry Street and 533 26th Avenue in the Central District neighborhood (District 3). 2514 and 2518 East Cherry Street are each 40 feet wide and 100 feet deep. 2616 East Cherry is 45 feet wide and 60 feet deep. 533 26th Avenue is 100 feet wide and 100 feet deep. These properties are typical of many small/shallow NC-55 sites around the city. Many of these parcels belong to longtime property owners, often families or owner-users, who do not have development or land use expertise. My own awareness comes from having started the redevelopment process on two of these parcels before the MHA legislation went through, and then having to rush to get that process vested to NC-40 in 2019 when I realized the devastating negative impact that the MHA formula would have for these sites. 55-1

While I was a proponent of MHA generally, the warnings that we gave to Councilmembers and Staff about the MHA changes to what were NC40 sites, prior to the adoption of the Citywide MHA program, have come true. The MHA payments have terribly diminished the existing value of this category of sites and made any new units that could be developed under MHA much more expensive than they previously were. In short, MHA has been a success in some zones, but in NC-55 zones (formerly NC-40), the program has been a disincentive to housing development. As such, I urge OPCD to study several policy suggestions outlined later in this letter.

First though, a reminder of why formerly NC-40 sites were always challenging, and therefore why the MHA changes tipped them from being challenging to infeasible, depressing housing creation and MHA fees in the NC-55 zones:

1. These sites are often on smaller commercial streets and tend to be relatively small and shallow, because they were historically zoned to reflect and/or encourage a shallow row of retail "liner" buildings in otherwise residential neighborhoods.

2. As such, they typically back up to immediately adjacent LR and NR zones, with no separating alley, and are therefore subject to a 15-foot setback at all the residential floors (i.e. above 13 feet). This condition can be found not just along East Cherry but, as just a few further examples, along the north side of Yesler in the CD, the west side of 15th Avenue on Capitol Hill, and the east side of 34th Avenue in Madrona.
3. The setback is very impactful on these shallow sites. At 2616 East Cherry, for example, the 15-foot setback removes 25% of the residential floor area. This means that the proscribed 3.25 FAR barely fits (and only if the ground floor is built to the back lot line with a blank wall). It also means that the stairs/elevators/hallways of a new building take up an inordinate amount of the floor plate relative to actual living space.
4. As NC-40 sites had started to be redeveloped around the city prior to 2019, a saving grace was that their four-story height didn't necessarily demand an elevator; and some innovative developers were choosing to do these as walkups (e.g. Pax Futura in Columbia City). This saved valuable FAR from being consumed by the elevator shaft and circulation space around it, and also saved $150k or more in purchase price for an elevator, and thousands more per year in annual operating expenses, improving both the feasibility of these sites and the affordability of the units. Unfortunately the fee payments that came with the MHA upzone subtracted mightily from the economic viability of this solution.

55-1 cont

MHA gave these sites an additional 0.5 FAR and an extra floor of height (from NC-40 to NC-55) but as illustrated by the points above, there is no practical way to use it. The 15-foot setback means that the four stories are already completely filled out. Going to five stories in order to capture 0.5 FAR on a small site is ENORMOUSLY expensive and inefficient. Market wisdom dictates that five floors necessitates an elevator, which along with the two stairs, circulation space, trash room/shaft easily consumes 600-800 SF per floor. On a site like 2514-2518 East Cherry, of the 4,000 SF in additional FAR, up to 25% of the additional floor would be consumed by common area. On an even smaller site like 2616 East Cherry (even with one stair serving less than four units per floor), a third to a half of the additional 1,350 SF in FAR would be consumed by the common area. In both cases, the enormous costs of adding an elevator and the building skin for an additional floor would far outweigh the finished value of the meagre additional living space created, and this is even BEFORE the costs of paying the MHA fees.

I am suggesting a multi-part solution for NC-55 sites that could be selectively applied to sites that directly abut residential zones and are less than 120 feet deep or 10,000 SF total:

1. Increase the FAR so that a full fifth story is possible on these sites, meaning a full 5.0 FAR. While this is likely not always useable due to need for windows, light and air, it would make these small sites useable to the five stories that the zoning intended.

2. Reduce the frequency of NC-zoned sites abutting neighborhood residential zones, and rezone the "back half" of these NC blocks from NR to NC. The City should work to eliminate these impactful transitions where NC zones abut NR directly or across an alley. Please study in the DEIS options that eliminate these transitions. The DEIS discloses that transitions in scale may be an issue in all alternatives, but the best way the City can mitigate this is to eliminate these awkward transitions altogether.

3. Study in the DEIS the elimination of upper-level setbacks when these transitions do occur in order to prioritize housing development. Eliminating upper-level setbacks will allow the full FAR to be utilized in these zones. The OneSeattle Plan's main goals revolve around increasing housing choices and expanding housing opportunities across the City. Whole swaths of the NC-55 zones

have been underdeveloped because of the combination of too-low FAR and these setbacks that are "protective" of neighborhood residential zones. As you are aware and the DEIS discloses, neighborhood residential zones have been "protected" for years "from" development in a manner that has been highly inequitable and exclusionary. Please consider whether protective setbacks of neighborhood zones is indeed an equitable solution.

Thank you for considering my input and please do not hesitate to contact me should you have any questions.

Sincerely,

Liz Dunn
Dunn & Hobbes, LLC
www.dunnandhobbes.com
206-324.0637

55-1
cont

Letter 56

From:	Dan Fiorito
To:	PCD_CompPlan_EIS; PCD_OneSeattleCompPlan
Cc:	Ian Morrison; Strauss, Dan
Subject:	Fiorito Family Property NE Ballard FEIS Study and FLUM designation
Date:	Monday, May 6, 2024 2:56:23 PM
Attachments:	05_06_2024_Fiorito_OPCD_Comment_Final.pdf

CAUTION: External Email

Mr. Quirindongo,

In response to the Draft Comprehensive Plan, please find attached my family's comments regarding its property in NE Ballard. We are requesting that our property be studied for inclusion within the Ballard Regional Center and that its designation be revised from industrial to a more appropriate designation that reflects the adjacent mixed-use and residential designations already in place. Let know if you have any questions. Thanks. Dan.

Dan N. Fiorito III
The Law Office of Dan N. Fiorito III
2470 Westlake Ave N., Suite 201
Seattle, WA 98109
Phone: 206-299-1582
Fax: 206-770-7590
Email: dan@danfiorito.com
Web Site: www.danfioritolaw.com

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56-1

THE LAW OFFICE OF
DAN N. FIORITO III

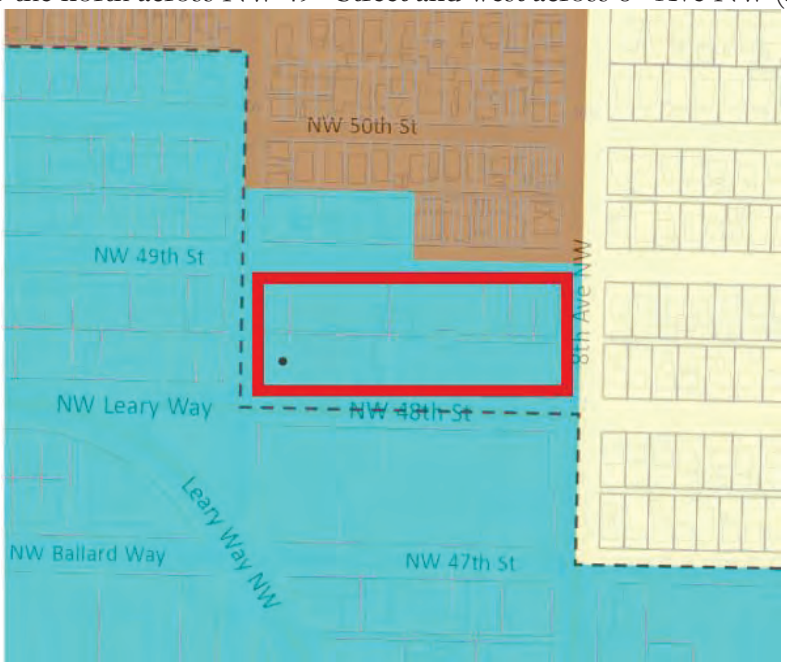
May 6, 2024

Office of Planning and Community Development
Seattle City Hall
600 4th Avenue, 5th Floor
Seattle, WA 98104
Attn: Rico Quirindongo
Email: PCD_CompPlan_EIS@seattle.gov

Re: Support for Ballard Regional Center expansion and land use regularization for orphaned industrial zoned properties in East Ballard outside of the BINMIC

Dear Mr. Quirindongo,

I write on behalf of my family Dan N. Fiorito, Jr. and Tim Fiorito, ("Fiorito Family"), the owners of the properties that comprise nearly a full block ("Property") bounded by NW 48th Street, NW 49th Street, 8th Ave NW, and 9th Ave NW in northeast Ballard. The City removed the Property from the Ballard Interbay Northend Manufacturing Industrial Center ("BINMIC") as part of the Industrial and Maritime Strategy process. Despite its removal from the BINMIC, the Property is still designated as industrial on the Future Land Use Map ("FLUM"). This designation remains unworkable because the Property is bordered by mixed-use residential and neighborhood residential zones to the north across NW 49th Street and west across 8th Ave NW (shown below).



56-1 cont

2470 Westlake Ave. N., Suite 201
Seattle, WA 98109
Ph: 206-299-1582 Fax: 206-770-7590
dan@danfiorito.com

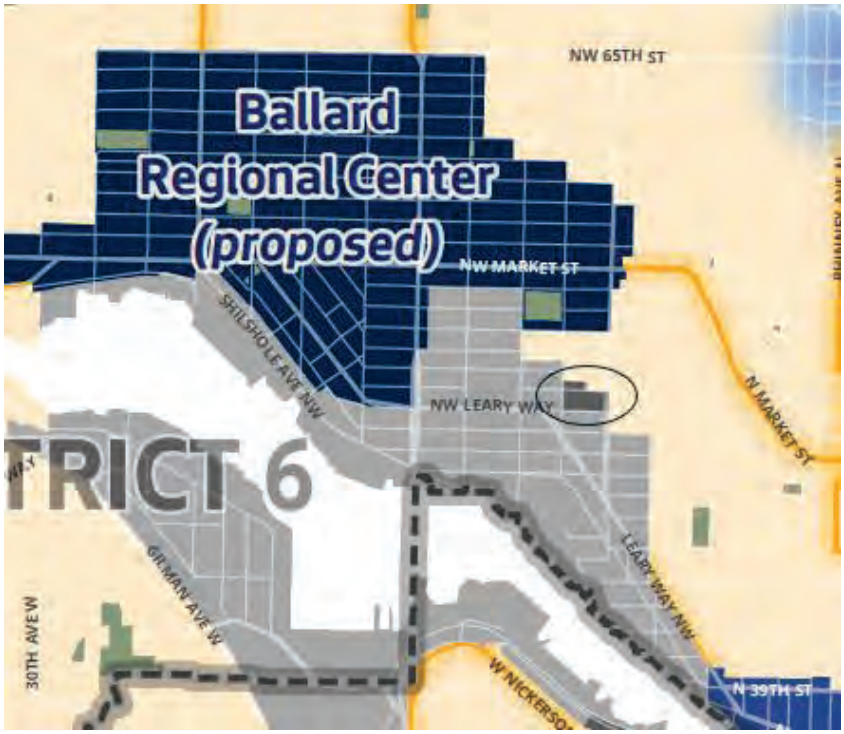
We write to request that the One Seattle Plan resolve our FLUM designation and bring it into the Ballard Regional Center. To serve that goal, the Final Environmental Impact Statement ("FEIS") should study our Property and other isolated lands outside the BINIMC for the Ballard Regional Center designation with appropriate heights as adjacent to the 8th Ave NW frequent transit corridor.

The Property's current FLUM designation under the One Seattle Plan and zoning is inconsistent with the surrounding mixed-use zoning. The City already recognized that our Property is not long-term viable industrial land when it removed the Property from the BINMIC as part of the Industrial and Maritime Strategy.

We believe it is illogical and impractical to maintain these industrial designations on isolated parcels outside the BINMIC and in locations that are rapidly transitioning to mixed-use and residential areas. The neighborhood around the Property longer is no longer industrial, thus making any use of the land for reasonable industrial purposes impossible.

56-1 cont

Our Property, as shown in the circle below, is a small, isolated pocket of non-BINMIC industrial land.



The current approach under the One Seattle Plan would treat the Property inconsistently with similarly situated properties to the north and west, hampering its integration with the surrounding area and preventing it from contributing residential capacity to a growing section of Ballard. By contrast, regularizing the land use designation and zoning of our Property with that of the surrounding residential area would be consistent with its removal from the BINMIC and would promote greater coherence in planning and development. It would also facilitate more efficient and

effective land use and development decisions that support the long-term growth and vitality of this node in Ballard.

Accordingly, we urge the City to study bringing the Property within the Ballard Regional Center and changing its FLUM designation and zoning to align with the surrounding mixed-use zoning. One option would be to bring the Ballard Regional Center down 8th Avenue from NW 52nd Street to NW 48th Street, so that the area was not a "donut hole" of neighborhood residential between the Regional Center and the BINMIC. We believe that approach better serves the One Seattle Plan vision. If part of the Ballard Regional Center, we encourage the City to expedite completing the subarea planning.

Thank you for considering our comments.

Sincerely,

s/Dan N. Fiorito III

On behalf of the Fiorito Family

cc: Councilmember Strauss

56-1
cont

Letter 57

ALEXANDRIA®

Building the Future of Life-Changing Innovation

May 6, 2024

VIA ELECTRONIC MAIL

Office of Planning and Community Development
Seattle City Hall
600 4th Avenue, 5th Floor
Seattle, WA 98104
Attn: Jim Holmes; Rico Quirindongo
Email: PCD_CompPlan_EIS@seattle.gov

Re: One Seattle Comprehensive Plan Draft Environmental Impact Statement

Dear Mr. Quirindongo,

Thank you for the opportunity to comment on the One Seattle Comprehensive Plan Draft Environmental Impact Statement ("DEIS").

Alexandria Real Estate Equities ("Alexandria") owns the site commonly known as the Salvation Army property, located at 1000 4th Avenue S. (the "Property"). In 2011, the Property, together with other nearby sites, was rezoned under the Livable South Downtown planning initiative. The environmental impact statement prepared for Livable South Downtown contemplated transitioning the Property and the nearby area into the Downtown Urban Center. However, late in the process, a decision was made to allow this area to remain in the Greater Duwamish Manufacturing Industrial Center (the "MIC"), but subject to a newly-created zone. 57-1

The IC-85/160 zone that was created for this area in 2011 is hardly an industrial zone. It is, in effect, a proxy for a Downtown zone, in that it incorporated a host of characteristics common to Downtown zones – but foreign to industrial zones – including:

- Required use of Housing Bonus and TDR provisions to achieve maximum density.
- Exception from maximum-size-of-use limits for office development
- Allowable height far in excess of typical industrial height limits and consistent with Downtown height limits

Alexandria Real Estate Equities, Inc.
400 Dexter Avenue North, Suite 200 | Seattle, WA 98109
TEL 206.408.1550 | FAX 206.325.6348 | www.are.com

- Requirements for sidewalk widening, pedestrian through-block connections, overhead weather protection, landscaping, and other streetscape improvements, and onsite open space, all typical of Downtown development and inconsistent with normal industrial zoning standards.

In 2023, the City revised the zoning for the Property and its vicinity to II 85-240. This new zone allows a 50% increase in density for office uses in the area, while still requiring the Downtown development standards noted above.

In truth, the II 85-240 zone is more akin to a Downtown zone than to any other industrial zone. Further, the area in which this unique zone is located is physically separated from the remainder of the MIC: it is bounded by the Stadiums on the west, the Metro bus bases on the south and the CID and residential neighborhoods on the north and east. Currently, there are permits for more than 1 million square feet of office space in this area – and more is possible – all designed to be compatible with the adjoining Downtown zones.

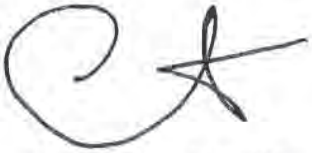
57-1 cont

In addition, Sound Transit is in the process of approval of the WSBLE line, which is likely to lead to the development of a new light rail station adjoining this area on Seattle Boulevard. And regardless of whether this "CID South" station is developed, this entire area is within a close walkshed of the existing Union Station light rail station. The area is well-suited for a mix of urban uses at high density.

Since this area is, in effect, an extension of the Downtown and is uniquely located to take best advantage of our regional light rail resources, it should be included in the Downtown and provided the opportunity to accommodate the same broad range of uses we see in Downtown. For example, our city and region continue to need robust housing development, especially in locations near regional transit facilities. This area is therefore ideal for future mixed-use and residential development, as well as the office and lab uses that are presently allowed. The current industrial designation of the area is, frankly, an historical accident. The area is already effectively a part of the Downtown and it has no connection to the industrial activities in the MIC.

For these reasons, the City should take action in the current Comprehensive Plan update process to remove this area from the MIC and incorporate it in the Downtown Urban Center, where it belongs. The opportunity for residential and mixed-use development will support the CID to the north and will align with the City's vision for Regional Centers.

Sincerely,



CHRISTIAN GUNTER
Senior Vice President - Development
Alexandria Real Estate Equities, Inc.
400 Dexter Avenue North Suite 200
Seattle, WA 98109

Letter 58

ALEXANDRIA®

Building the Future of Life-Changing Innovation

May 6, 2024

Michael Hubner
Long Range Planning Manager
One Seattle Plan Project Manager
Office of Planning & Community Development
P.O. Box 94788
Seattle, WA 98124

(OneSeattleCompPlan@seattle.gov; PCD_CompPlan_EIS@seattle.gov)

Re: *Comments on Draft One Seattle Comprehensive Plan ("Draft Plan") and its Draft Environmental Impact Statement ("DEIS").*

Dear Michael and OPCD staff:

Alexandria Real Estate Equities ("ARE") is a publicly traded Real Estate Investment Trust. ARE was founded in 1994 as the first real estate company uniquely focused on delivering the buildings and infrastructure needed to support the work of the life science industry. Today, we create and grow life science ecosystems and clusters that ignite and accelerate the world's leading innovators in their work to advance human health by curing disease and improving nutrition. We have a proven record of effectively creating, nurturing, managing, and growing life science ecosystems and clusters across the country by bringing our mission-critical real estate together with scientific innovation, and Seattle is one of our seven selected cluster, mega campus locations.[1] Active in the Greater Seattle region as a long-term owner and occupier since 1996, ARE's operating portfolio represents over three million square feet regionally, including 1.5 million square feet of specialized Class A laboratory space in Seattle centered around South Lake Union, Fred Hutch, the University of Washington and the Bill & Melinda Gates Foundation. In addition, ARE currently has more than 3 million square feet in the development pipeline. 58-1

Informed by our long-term investment in and commitment to supporting Seattle's life sciences institutions and industries through real estate development, we are pleased to provide the following comments on the draft One Seattle Plan ("Draft Plan") and accompanying Draft Environmental Impact Statement ("DEIS").

[1] Other selected clusters for our life science ecosystems include Greater Boston, the San Francisco Bay Area, New York City, San Diego, Maryland, and the Research Triangle.

ALEXANDRIA.

Building the Future of Life-Changing Innovation

1. The Mayor's Recommended Plan and Final EIS Should Prioritize and Incentivize Life Sciences Investment.

The Draft Plan was disappointing in its lack of attention to life sciences. This industry is not only an engine that creates all manner of good, highly specialized and compensated jobs, but is also an engine for providing treatments and cures to some of the most troubling health issues that humanity faces. Although life sciences was identified as a key industry cluster, only general policies were identified to support it in the Plan.[2] Instead, the Plan and the EIS should articulate support for the unique space needs of life science users. Fortunately, many opportunities for improvement are available.

- *The Final Plan and FEIS should propose and study development standards (or flexibility in development standards) to accommodate the unique needs of the life-sciences industry, such as allowances for additional rooftop mechanical equipment, electrical system redundancies, and flexibility in energy code requirements.*

- *The Final Plan and FEIS should study and identify policies supporting significant revisions to the City's entitlement processes to deliver life science projects faster. The design review program must be overhauled consistent with HB 1293 (RCW 36.70A.630) to reduce the number of design review meetings and project risk. The City should also extend and expand the current design review holiday proposed for Downtown and South Lake Union, and it should create a program to expedite life science projects and tenant improvements similar to successful steps taken by San Diego.[3]*

- *The Final Plan and FEIS should acknowledge that laboratory processes can be uniquely sensitive to even the tiniest vibration impacts. As Sound Transit expands, the availability of vibration-free land is expected to decrease. Zoning and development standards should acknowledge and prepare for these effects on the industry, and the FEIS should study the effects of and appropriate mitigation measures for a decrease in vibration-free land capacity.*

58-1 cont

2. The final Plan and EIS Must Include More Detailed Analysis of Impacts Under A Range of Different Scenarios for Employment and the Economy, and Should Articulate a Bold Life Sciences Economic Development Strategy.

The Draft Plan and DEIS take a cursory approach to employment growth over the planning period, both as a factor in commercial built density (including life-sciences space) that will be needed, and as a critical contributing factor in our region's economic success. Both the Draft Plan and EIS appear to assume that job growth in Seattle will exactly match the regional targets set by King County without

58-2

[2] *See, e.g.*, Plan at 130 ("Examples of Examples of Seattle's industry clusters include manufacturing, maritime, biotech and life sciences, global health and health care, clean technology, information technology, tourism, and film and music."); 133 ("employers often face challenges finding qualified job applicants . . . to fill jobs in certain engineering, computer, and life science fields, as well as traditional industries").

[3] *See* https://www.sandiego.gov/development-services/news-programs/life-science-industry-pilot-program

any analysis of how net job growth across the City might actually differ between the different Alternatives studied, or as a result of different economic strategies that could be articulated in the Plan. We are further concerned that the 159,000 jobs (less than 8,000 a year) identified in the Draft Plan and DEIS is a significantly lower target than is actually needed for the City to thrive economically.

The Final Plan and FEIS should provide further quantification for job estimates based on actual economic trends and data to identify a healthy job growth level for the City, and these documents should also articulate specific strategies to achieve such growth. Policymaking should be aspirational in its targets, but also must articulate actionable strategies. Life science users are attracted to Seattle because of our world-class existing institutions, but Seattle is competing with considerably bigger markets who also have world-class institutions. Other cities and states are providing meaningful incentives to competitively attract companies and users—like research and development tax credits, sales tax exemptions, and guaranteed utility supplies—and Seattle should do the same. Policies aimed at incenting life science sector development articulated in the final Plan can be a first step to support these initiatives to compete successfully for new life science opportunities. A specific policy to incentivize locating life science companies in Seattle should be added to the "Business and Industry Retention and Growth" section of the Plan. 58-2 cont

3. The Final Plan and FEIS Should Support Life Sciences by Providing Greater Clarity in its Approach to Additional Density Regional Centers and Urban Centers.

The Draft Plan's new taxonomy of Regional Centers, Urban Centers, and Neighborhood Centers is well-considered. ARE's life-sciences end-users will depend on these centers both for new lab space to conduct their critical work and for the housing needed to accommodate researchers and their support staff in sustainable, equitable and transit-oriented communities here in Seattle.

For Regional and Urban Centers, however, the Draft Plan contains limited information about what development standards will actually be modified as a result of this process. For example, proposed height limit changes in Regional Centers – the engines of our economy – are studied only as "height varies, high-rise allowed." *See* DEIS at 3.6-172. Urban Centers are likewise *studied* up to a height change of 145 feet, but the Draft Plan does not provide information on what heights are actually proposed. This is a tremendous range of potential growth, but also includes the possibility of no upward growth at all. Similarly, but even more problematically, the Draft Plan does not specify what (if any) increases in permissible floor area ratio are contemplated in Regional and Urban Centers, and the DEIS does not appear to include study of the adverse environmental impacts of a failure to provide enough new floor area ratio to keep pace with the job growth necessary for a healthy economy in our City. The City should 58-3

clarify the contemplated density increases in the Final Plan and FEIS, and it should also advance baseline density changes ahead of any future subarea plans for Regional Centers.

At minimum, the City should allow heights of 180 feet in Regional Centers to support building forms necessary for life science research and development. Likewise, the City should adjust the height at which buildings are designated "towers" for under the land use code from 160 feet to 180 feet to allow

flexibility for 180-foot life science buildings without additional modulation, floorplate size, and tower separation standards that undercut essential building functions.

4. Conclusion

Through the One Seattle Plan, the City has a once-in-a-generation opportunity to infuse new energy, opportunity, and industry into the fundamental fabric of Seattle. ARE hopes to contribute to this work not only in the planning process, but in the post-plan buildout, by continuing to bring world-class life science spaces into service here in the Seattle. 58-3 cont

We appreciate your consideration of these comments, and look forward to working with you to continue building a Seattle that brings the world new cures, treatments, and other innovations.

Sincerely,

CHRISTIAN GUNTER
Senior Vice President - Development
Alexandria Real Estate Equities, Inc.
400 Dexter Avenue North Suite 200
Seattle, WA 98109

Chhan Investments LLC
1700 7th Ave Suite 2100
Seattle, WA 98101

Letter 59

May 3, 2024

VIA EMAIL

Office of Planning and Community Development
Seattle City Hall
600 4th Avenue, 5th Floor
Seattle, WA 98104
Attn: Rico Quirindongo
Email: PCD_CompPlan_EIS@seattle.gov

Re: Comment on Draft One Seattle Plan

Dear Mr. Quirindongo,

Thank you for the opportunity to comment on the One Seattle Comprehensive Plan Draft Environmental Impact Statement ("DEIS"). We write as owners of property in the First Hill/Capitol Hill Regional Center. Dan Chhan owns the 620 Belmont Avenue East ("620 Belmont") and 614 Boylston, LLC owns 614 Boylston Avenue East ("614 Boylston" and collectively the "Properties"). 59-1

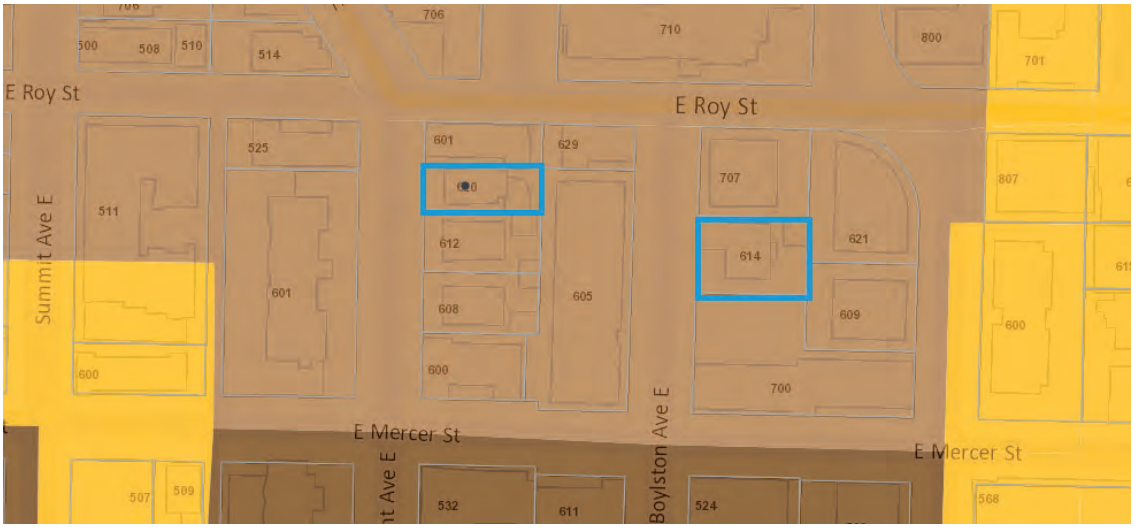
Both Properties are currently developed with single-family residences; however, 614 Boylston is currently used as an office. Overall, we support the Mayor's vision for the One Seattle growth strategy.

However, we encourage the City to evaluate additional height and density inside the First Hill/Capitol Hill Regional Center. The Properties are both currently zoned LR-3, a multifamily zone which allows residential development of townhouses, rowhouses, and apartment buildings. The maximum height under the current zoning allowed is typically 50 feet. The Mayor's vision for the Regional Centers calls for these areas to be the densest neighborhoods and to potentially support zoning for high-rise towers.

Our neighborhood around E. Roy Street in the Regional Center is a walkable, vibrant area with housing, office, retail, restaurant, and entertainment uses. We believe the First Hill/Capitol Hill Regional Center near Roy Street should zone for heights of 95 feet, especially for mass timber buildings. These densities are more consistent with the Regional Center vision, and would allow for these Properties to better serve the people who live and work in Capitol Hill by creating more housing options and/or mixed-use developments which could provide retail and other amenities for the residents and pedestrians who are drawn in by the unique character of this stretch of E. Roy Street.

Furthermore, as shown on the map below, the two blocks which contain these Properties are already adjacent to NC zoning with similar heights. Aligning the area's zoning to a 95-foot height, in addition to fostering more practical development and increased housing supply in the area, would create a more uniform zoning regime by connecting the existing NC zone on the left with the much larger one on the right. We believe it is good policy to keep zoning designations consistent within a subarea, to reduce uneven future development patterns and allow for a more coherent neighborhood character.

Chhan Investments LLC
1700 7th Ave Suite 2100
Seattle, WA 98101



We recognize and appreciate the amount of work that has gone into drafting the One Seattle Plan, but encourage the City to be bold with planning for Urban Center densities because this is a key part of the future housing growth. We should not waste this opportunity presented with the Comp Plan update.

59-1 cont

The Final Environmental Impact Statement ("FEIS") for the One Seattle Plan should study increased housing and jobs targets for the First Hill/Capitol Hill Regional Center including our Properties at 95-foot heights, including the potential for bonuses for mass timber construction, so that the City can better understand the potential benefits and impacts and be ready to adopt any necessary zoning.

As always, thank you for your consideration. Please do not hesitate to contact us if there is any additional information that we can provide that would help inform the City's evaluation of this idea.

Sincerely,

s/Dan Chhan

s/Dave Enslow
On behalf of 614 Boylston, LLC

cc: Councilmember Hollingsworth

600 University St, Ste 1020
Seattle, WA 98101-4107
(206) 470-8000 tel
(206) 470-8190 fax
eraliving.com

VIA EMAIL

May 3, 2024

Office of Planning and Community Development
Seattle City Hall
600 4th Avenue, 5th Floor
Seattle, WA 98104
Attn: Rico Quirindongo
Email: OneSeattleCompPlan@seattle.gov

RE: Comments on the Draft One Seattle Plan

Dear Mr. Quirindongo,

Thank you for the opportunity to comment on the One Seattle Comprehensive Plan Draft Environmental Impacts Statement ("DEIS"). The Ida Culver House Ravenna ("House"), owned by Era Living, is located at 2315 Northeast 65th Street ("Property") in the Ravenna neighborhood. The House is a welcoming retirement community that provides independent and assisted living options.

We write to express support for Ravenna's continued progress towards becoming a complete and walkable neighborhood. We also support additional zoned capacity within the Ravenna neighborhood generally and specifically on both sides of the 65th Street commercial corridor. We encourage the City to include the Mayor's proposed Ravenna neighborhood center in the final Plan, and that property within 1,000 feet of the 25th Avenue NE and NE 65th Avenue intersection support 8-story densities to support further enhancements to vibrant, mixed-use walkable neighborhood. 60-1

Along with our support for greater zoned capacity in the neighborhood, we also request that the City study the potential environmental impacts of resolving split-zoning within the neighborhood in favor of the higher density zoning. As the below image shows, the Property consists of two King County parcels, 7173700475 ("West Parcel") and 7173700480 ("East Parcel").

60-1 cont

Despite hosting a shared living facility that crosses its two parcels, the Property itself falls within two different zones. The entirety of West Parcel and the northern portion of the East Parcel fall within the NC-2-P-55 (M) zone, while the majority of the East Parcel is zoned Neighborhood Residential-3. Below is a map of the Property's split zoning.

As a policy matter, we believe that split zoning should be avoided due to the complications it presents for owners. Our split zoning certainly has impacted the ability to modernize our facility.

As the below image shows, the Property (indicated by the bold black dot) is located 0.64 miles walking distance from the Roosevelt light rail station and surrounded by a mix of neighborhood commercial and residential uses.

60-1 cont

As the City seeks to expand access to housing and business opportunities, the resolution of split-zoning in general offers an easy path forward. In the Property's case, resolution of its split-zoning will ensure that the Home is able to carry on its mission of providing much-needed senior living. Thus, we also request that the City specifically study any potential environmental impacts that resolution of the Property's split-zoning in favor of the parcels being zoned neighborhood commercial density might entail so that such harmonized zoning can be incorporated into the final version of the One Seattle Plan and the potential for the new Ravenna neighborhood center.

We also note that there is a pending contract rezone for the Property that seeks to resolve the difficulties arising from the Property's split zoning. However, as matter of policy consistency we would urge the City to resolve this issue through the One Seattle Comprehensive Plan update.

Thank you again for the opportunity to comment and please feel free to contact me if any additional information related to the above comments is needed.

Sincerely,

Nisan Harel

Nisan Harel
Chief Operating Officer
Era Living

Letter 61

May 3, 2024

VIA EMAIL

Office of Planning and Community Development
Seattle City Hall
600 4th Avenue, 5th Floor
Seattle, WA 98104
Attn: Rico Quirindongo
Email: PCD_CompPlan_EIS@seattle.gov

Re: One Seattle Comprehensive Plan Draft Environmental Impact Statement
MRH Properties, LLC 1103 – 1109 North 36th Street Comment Letter

Dear Mr. Quirindongo,

On behalf of MRH Properties, LLC, I am writing to comment on the One Seattle Comprehensive Plan ("One Seattle Plan") Draft Environmental Impact Statement ("DEIS"), maps, and policies. My family, through MRH Properties, owns two parcels at 1103 – 1109 North 36th Street in the Fremont Hub Urban Village ("Property"). I am writing in support of the Mayor's proposed creation of the Fremont Urban Center and to request that our Property is zoned for neighborhood commercial use.

Currently, our Property is in the Fremont Hub Urban Village. It is not inside, or even near, any of the City's manufacturing/industrial center ("MIC") or shoreline environment. Despite our location within the Fremont Hub Urban Village, our Property is zoned Industrial Commercial. As you can see, our Property is surrounded directly to the north and west by neighborhood commercial zoning.

61-1

We have owned our Property for over 36 years. We are a Seattle born family and have worked hard to recruit and retain our tenants to occupy our renovated manufacturing buildings, parts of which date to 1909, 1950's and 1980's. However, over the last decade, our existing office and warehouse tenants, each occupying for over 25 years, have vacated. All around our Property, the City is redeveloping with new apartments, restaurants and retail on Woodland Park Avenue and Stone Way. Today, our neighborhood is truly a mixed-use residential area. However, our current zoning does not match this reality. We are struggling to find any viable industrial tenants for this building. It is not an industrial area. We were especially surprised when we learned – only after its final passage – that the City had done an update to its Industrial and Maritime zoning. No one from the City contacted us during that process to hear about our experience. We believe the City missed the opportunity in that Industrial and Maritime Strategy process to better align the zoning

for our little isolated swath of land with the rest of the Fremont Hub Urban Village.

We believe this One Seattle Plan process should resolve that oversight and align our zoning with the rest of the proposed Fremont Urban Center to support a mixed-use neighborhood environment.

Specifically, our comments on the DEIS are:

- **Support for Fremont Urban Center**. We support the Fremont Urban Center designation, including our Property, to create a wide range of housing, restaurant, retail, and job growth. We agree with the City's vision that Urban Centers should support a "significant" share of housing and allow for up to 8-story mixed-use residential housing types. The final One Seattle Plan and land use maps must resolve the zoning inconsistencies presented by our isolated, area of industrial commercially-zoned land within the Fremont Urban Center by adopting neighborhood commercial zoning with appropriate heights for our Property.

- **Growth Assumptions**. The DEIS contemplates a net new target of 1,537 new housing units and upwards of 311 new jobs in the Fremont Urban Center over the course of the Plan. We estimate that our Property alone could support nearly 200 units, depending on the permitted height, under neighborhood commercial zoning for an Urban Center. The Final Environmental Impact Statement ("FEIS") should study increased housing and jobs targets for the Fremont Urban Center including our Property, and the other industrial commercial zoned property inside the Urban Center, so that the City can better understand the potential benefits and impacts of those changes and be positioned to readily adopt those new maps.

- Consistency with Policies. The One Seattle Plan includes Policy LU 13.11 that states:

  "**Avoid placing industrial zones** within regional, **urban** and neighborhood **centers** However, in **locations where a center borders a Manufacturing and Industrial Center**,
  use of the industrial commercial zone within the center where it abuts the Manufacturing and Industrial Center to provide an appropriate transition to help separate residential uses from heavier industrial activities." (emphasis added)

  Our Property is not in – or even near – a MIC. Simply put, our Property should not be zoned industrial per the City's own policies. The City should study this issue in the FEIS for consistency with the current or proposed Comprehensive Plan, including Policy LU 13.11. We believe the only reasonable conclusion after that study must be to change the zoning to match our Property with the Fremont Urban Center mixed-use zoning and 8 story heights.

61-1
cont

For these reasons, we ask that the City update the Future Land Use Map and zoning as part of the Mayor's preferred alternative in the FEIS and One Seattle Plan to be consistent with the rest of the Fremont Urban Center to our north and west. New mixed-use residential development on our Property supports the Fremont Urban Center and implements the Mayor's One Seattle Plan vision.

Thank you for your consideration. Please feel free to contact me with any questions.

Sincerely,

Helene Heglund
MRH Properties, LLC
206-618-1104
helenereed@comcast.net

cc: Councilmember Maritza Rivera
Councilmember Dan Strauss

SCHNITZER WEST

May 6, 2024

VIA ELECTRONIC MAIL

Office of Planning and Community Development
Seattle City Hall
600 4th Avenue, 5th Floor
Seattle, WA 98104
Attn: Jim Holmes; Rico Quirindongo
Email: PCD_CompPlan_EIS@seattle.gov

Re: One Seattle Comprehensive Plan Draft Environmental Impact Statement

Dear Mr. Quirindongo,

Thank you for the opportunity to comment on the One Seattle Comprehensive Plan Draft Environmental Impact Statement ("DEIS").

Schnitzer West ("Schnitzer") owns the properties located at 570 Mercer St and 550 Mercer St, a full block for which Schnitzer has been permitting (3035337-LU and 3039269-LU, respectively) to develop future office buildings (the "Property"). Given the current state of the financial markets and the lack of office demand in the Seattle market, it makes sense to consider possible future residential development for the Property.

62-1

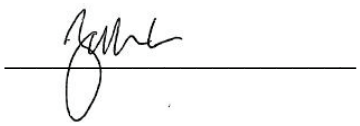
Unfortunately, the current zoning provisions for residential development in the Uptown neighborhood impose obstacles to such development. The 85-foot height limit does not support the kind of residential development that could be achieved in this center-city neighborhood and does not incentivize the use of heavy timber construction for residential uses.

We write to express support for Alternative 5 in the DEIS, but request the Final EIS and Uptown Urban Center Subarea Plan study at least 125 feet in height on the Property. A 125-foot height limit would allow for flexible multifamily development density, at a scale consistent with the broader neighborhood. We have attached a study of this larger neighborhood, which includes residential heights of up to 280 feet only a few blocks away from the property. Just to the south of the Property, residential development is allowed at a height of 160 feet. Allowing greater heights along the north side of Mercer Way would align with the City's vision for Regional Centers.

We appreciate your attention to these comments and welcome an opportunity to meet with you to review our research & work product attached hereto.

62-1 cont

Sincerely,



Zeb Keck
Partner and Senior Director, Construction & Development

Seattle Mixed - Uptown

Zoning Height Analysis

01-17-2024

62-1
cont

SM-UP 85
Seattle Mixed Uptown 85

- **Podium Height:**
  N/A
- **Lot Coverage Above Podium:**
  N/A
- **Floor Area Ratio:**
  Max for all uses: 5.25
- **Floor Area Limits:**
  Unlimited
- **Upper Level Setbacks:**
  For designated streets, setback avg of 10 ft required above 45/65 ft

SM-UP 125 (PROPOSED)
Seattle Mixed Uptown 125

- **Podium Height:**
  N/A
- **Lot Coverage Above Podium:**
  N/A
- **Floor Area Ratio:**
  TBD
- **Floor Area Limits:**
  Unlimited
- **Upper Level Setbacks:**
  For designated streets, setback avg of 10 ft required above 45/65 ft

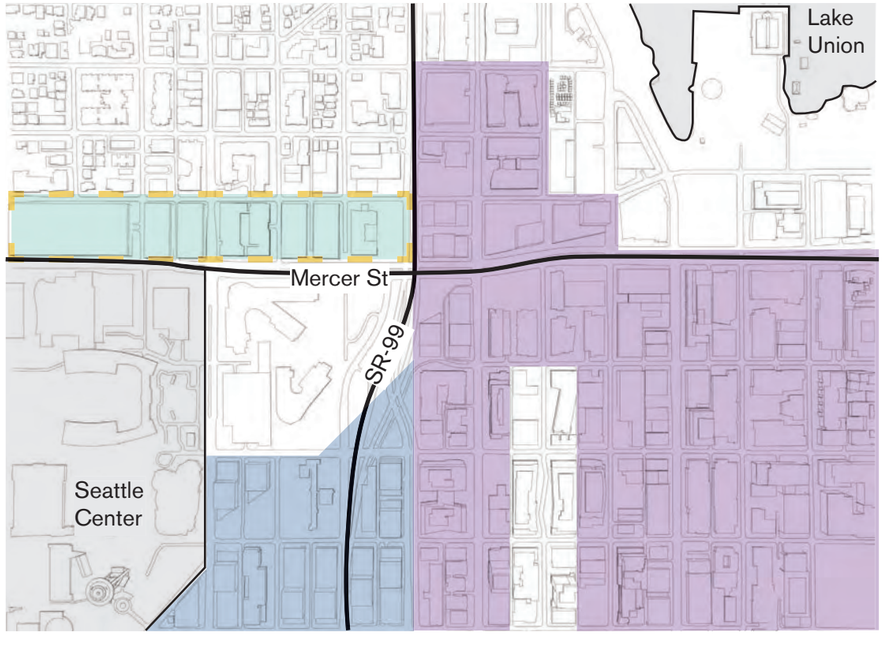
SM-UP 160
Seattle Mixed Uptown 160

- **Podium Height:**
  45 ft
- **Lot Coverage Above Podium:**
  Avg GFA 50% max
- **Floor Area Ratio:**
  Base for all uses: 5
  Max Residential: 7 Non-Residential: 2
- **Floor Area Limits Above Podium:**
  Avg 12,500 SF/floor max
- **Upper Level Setbacks:**
  For designated streets, setback avg of 10 ft required above 45/65 ft

SM-SLU 175/85-280
Seattle Mixed South Lake Union 175/85-280

- **Podium Height:**
  45/65/85, depending on street
- **Lot Coverage Above Podium:**
  Average GFA 50% max
- **Floor Area Ratio:**
  Base Non-Residential: 4.5
  Max Residential: 6 Non-Residential: 8
- **Floor Area Limits Above Podium:**
  Avg 10,500 SF/floor max
  Single residential story 11,500 SF/floor max
- **Upper Level Setbacks:**
  For designated streets, setbacks req above 45 ft
  For designated streets, setbacks req above 45 ft
- **SLU Flight Path Corridor**
  Additional reduction in height along flight path

Zoning Keymap



SLU Flight Path Corridor

62-1
cont

Map Key

SM-SLU 175/85-280
Seattle Mixed - SLU: 280' Height Limit

SM-UP 160
Seattle Mixed - Uptown: 160' Height Limit

SM-UP 85
Seattle Mixed - Uptown: 85' Height Limit

SM-UP 65
Seattle Mixed - Uptown: 65' Height Limit

SM-UP 95
Seattle Mixed - Uptown: 95' Height Limit

SM-SLU 85-280
Seattle Mixed - SLU: 280' Height Limit

Shoreline Zoning

Low-rise Zoning

Urban Center Village Boundary

SLU Flight Corridor

Future Development Sites

Zoning + Overlay Designations

Map Key

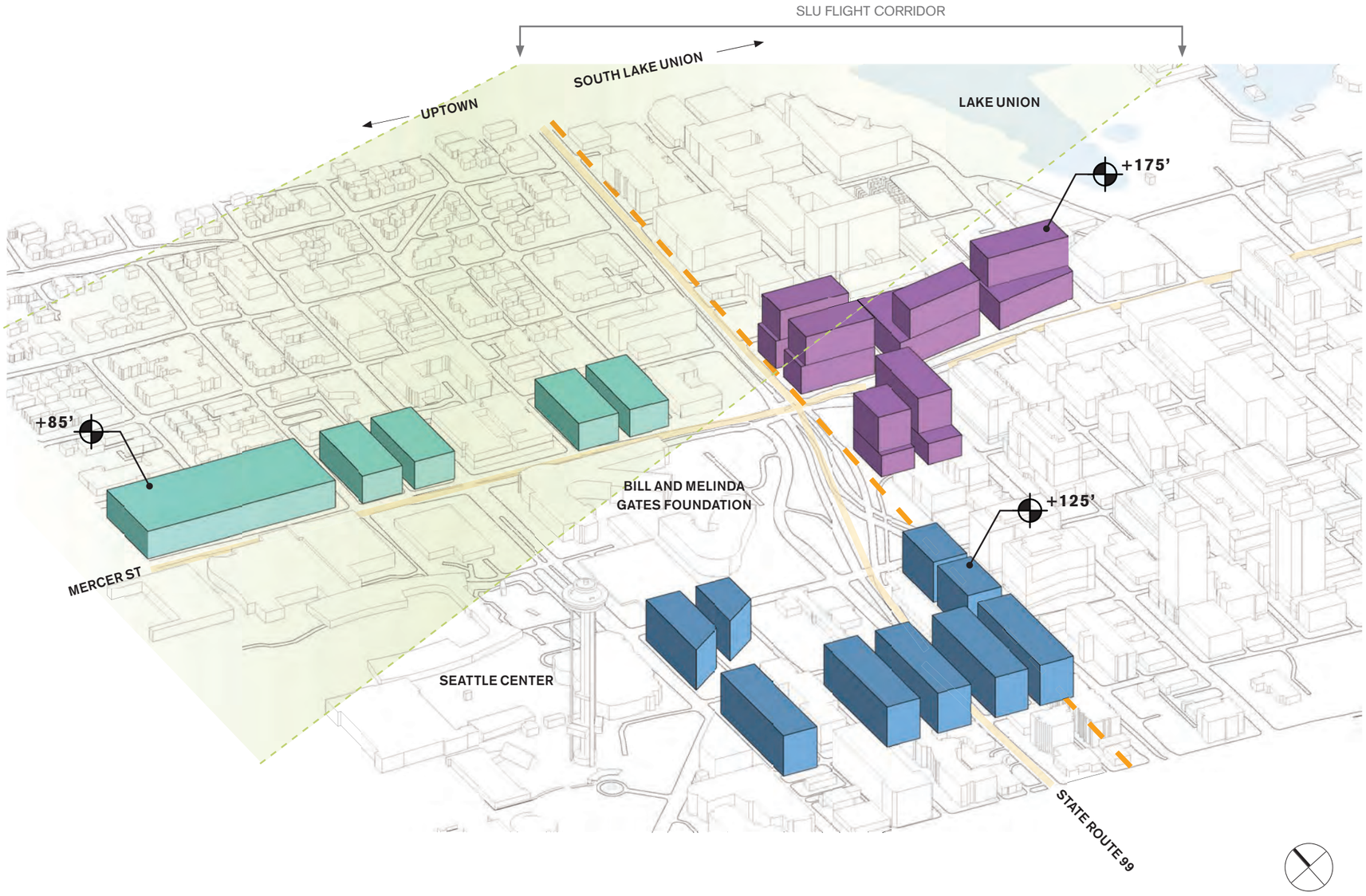
SM-SLU 175/85-280
Seattle Mixed - SLU: 280’ Height Limit

SM-UP 160
Seattle Mixed - Uptown: 160’ Height Limit

SM-UP 85
Seattle Mixed - Uptown: 85’ Height Limit

Urban Center Village Boundary

Existing Commercial Zoning Height Limits - Aerial view facing Northeast



62-1
cont

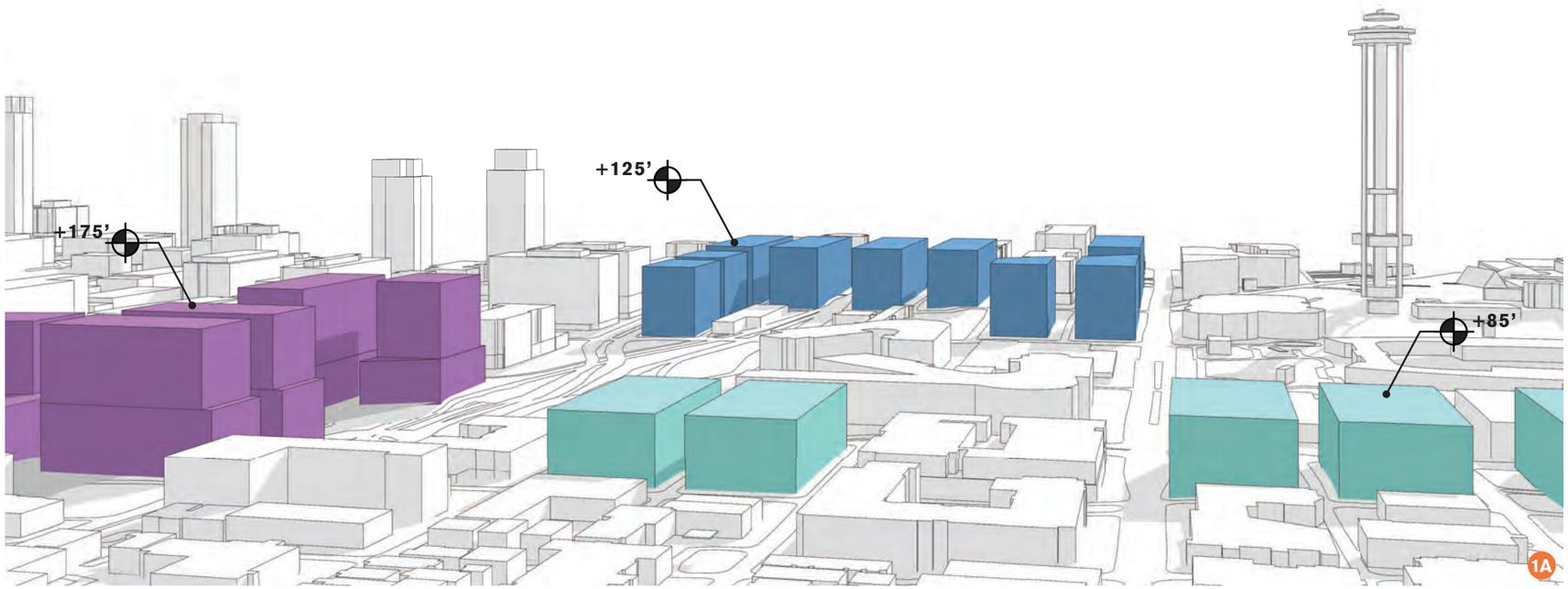
Key

SM-SLU 175/85-280
Seattle Mixed - SLU: 280’ Height Limit

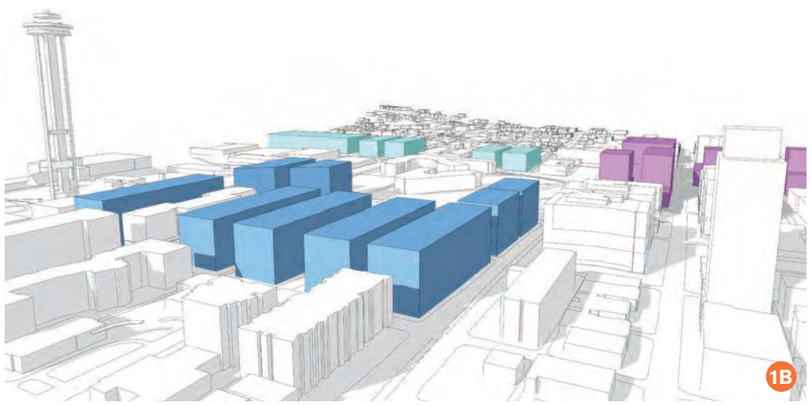
SM-UP 160
Seattle Mixed - Uptown: 160’ Height Limit

SM-UP 85
Seattle Mixed - Uptown: 85’ Height Limit

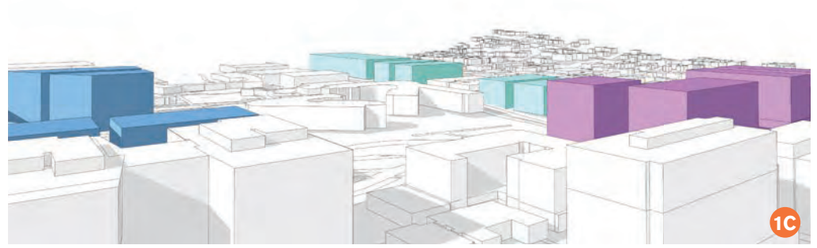
Perspective View Facing South



Perspective View Facing Northwest



Perspective View Facing West



62-1 cont

Map Key

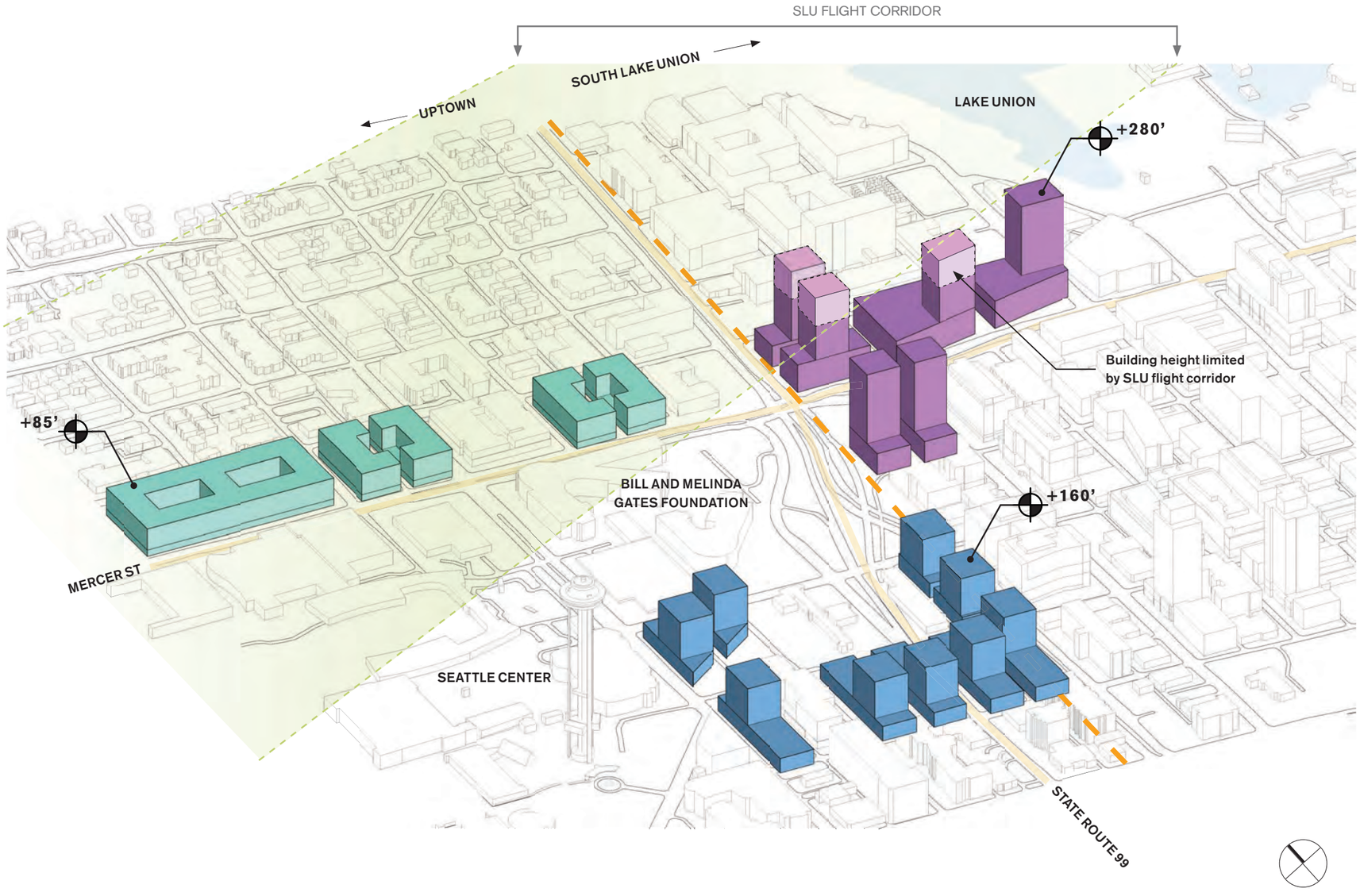
SM-SLU 175/85-280
Seattle Mixed - SLU: 280’ Height Limit

SM-UP 160
Seattle Mixed - Uptown: 160’ Height Limit

SM-UP 85
Seattle Mixed - Uptown: 85’ Height Limit

Urban Center Village Boundary

Existing Residential Zoning Height Limits - Aerial view facing Northeast



62-1
cont

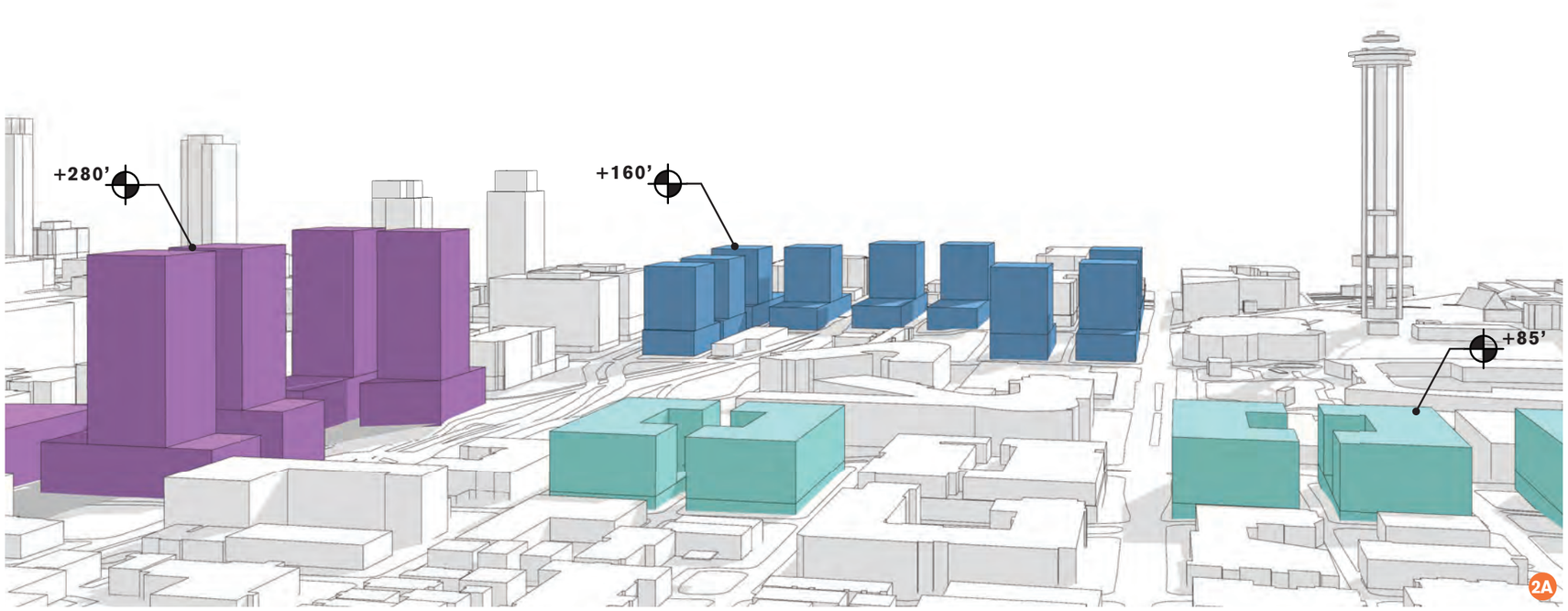
Key

SM-SLU 175/85-280
Seattle Mixed - SLU: 280’ Height Limit

SM-UP 160
Seattle Mixed - Uptown: 160’ Height Limit

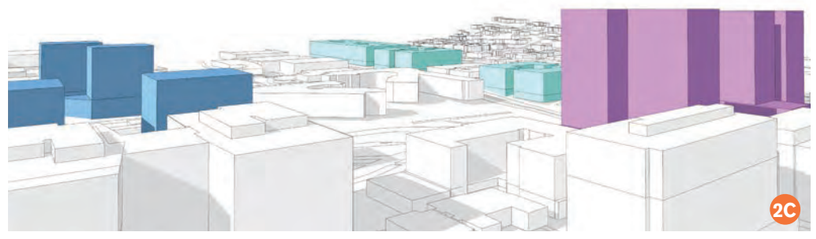
SM-UP 85
Seattle Mixed - Uptown: 85’ Height Limit

Perspective View Facing South



Perspective View Facing Northwest

Perspective View Facing West



62-1
cont

Map Key

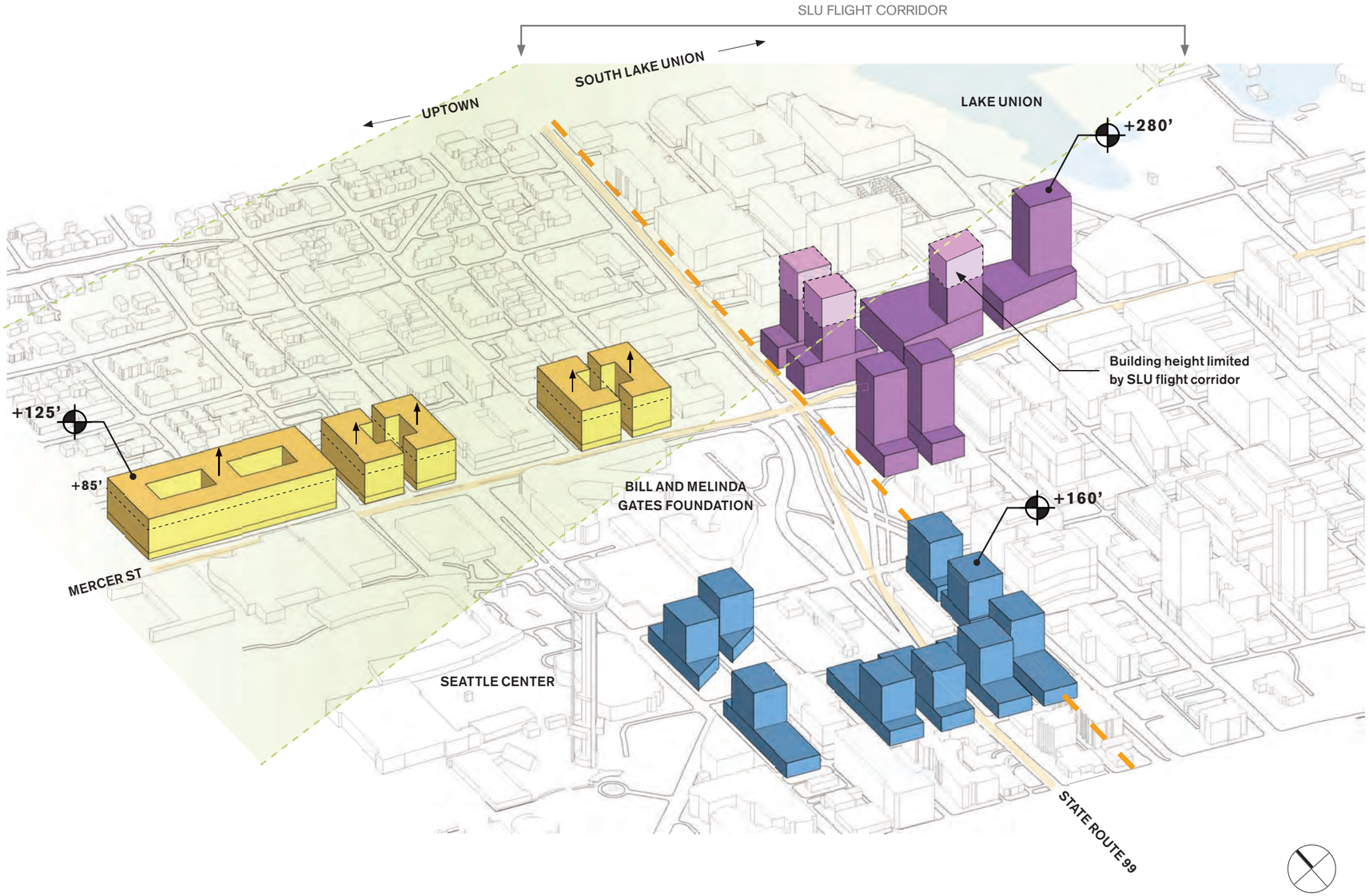
SM-SLU 175/85-280
Seattle Mixed - SLU: 280’ Height Limit

SM-UP 160
Seattle Mixed - Uptown: 160’ Height Limit

PROPOSED SMU-UP 125
Seattle Mixed - Uptown: 125’ Height Limit

Urban Center Village Boundary

Proposed Residential Zoning Height Limits - Aerial view facing Northeast



62-1
cont

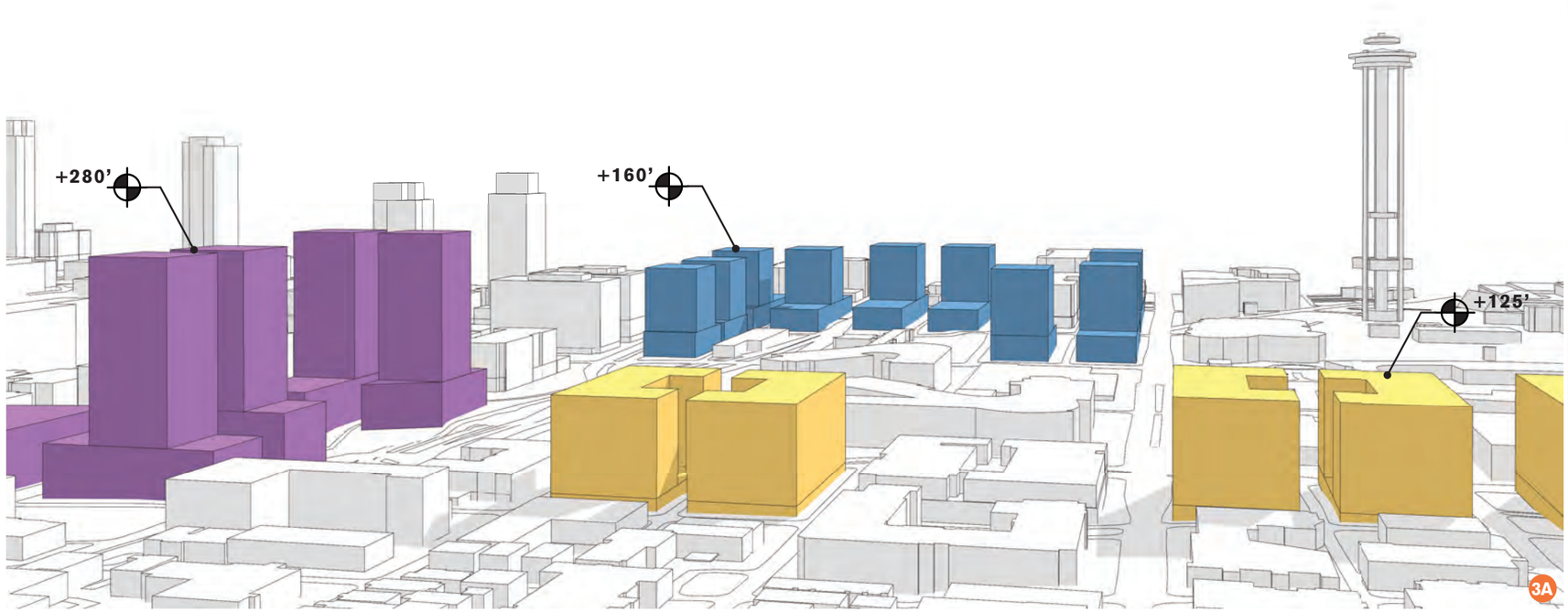
Key

SM-SLU 175/85-280
Seattle Mixed - SLU: 280’ Height Limit

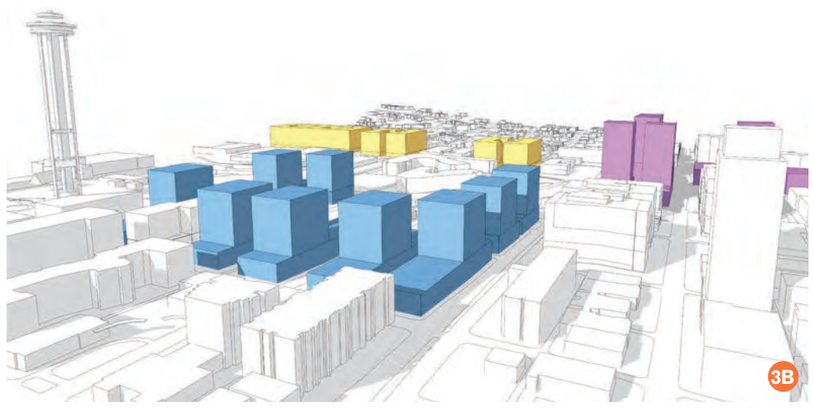
SM-UP 160
Seattle Mixed - Uptown: 160’ Height Limit

PROPOSED SMU-UP 125
Seattle Mixed - Uptown: 125’ Height Limit

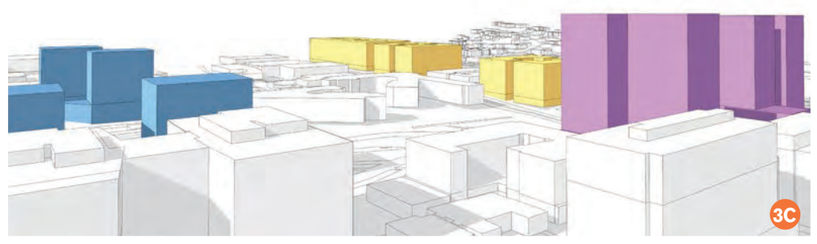
Perspective View Facing South



Perspective View Facing Northwest



Perspective View Facing West



62-1
cont

From: Mark Kramer
To: PCD_CompPlan_EIS; Moore, Cathy
Subject: 130th Street Station
Date: Monday, May 6, 2024 1:09:06 AM

CAUTION: External Email

I own a home on the corner of 8th Ave. and 130th St. I bought this house with my wife in 2003 because we wanted to move out of Capital Hill and into the suburbs of Seattle. We wanted a quiet neighborhood with a yard, and trees, but we still wanted to live in Seattle so we moved 7 miles north of downtown to 8th Ave. NE., as far north as you can go without living in Shoreline. Sadly, we now have a station no one in our neighborhood (and many other Seattle taxpayers) wanted, less than one mile away from another, much larger station.

I 'met' with CM Moore during her walking meeting at the station. I say 'met' as I basically had 30 seconds to speak about the concerns of our neighborhood and the upcoming changes that will impact us directly. It was extremely frustrating having 3 people that were in our group, who live downtown and WAY out of our district, using up what little time the local residents' had to speak with OUR representative about how much this station would affect the people living 2 blocks away. We had people coming from Capital Hill saying we need more density in our neighborhood all the way up at 130th St. I was hoping that meeting would have been more about the people that the station directly effected.

Our street, 8th AVE. NE, sits directly down at the bottom on the east-side of the hill from the future light rail station. I do not look forward to 7-story buildings at the top of our hill blocking the western sunlight an hour or two early in the evening, especially in the winter. I wonder what all this will do to the Flicker Reserve Natural Area further down the hill from us around Thornton Creek. I understand that there is a plan to replant any trees that are removed, like that is an acceptable solution. We moved here FOR the trees, the old growth 5-10 story tall trees. Gutting them and simply planting a sprout that we hope lives long enough to grow tall and eventually get cut down 75 years from now for the next great city project is not acceptable to myself nor my neighbors.

If apartments, with the densities that are being discussed, are added, where will those people park their cars? I know the fantasy is that people moving into apartments across from the light-rail will not have cars and will just use public transportation, but that is not reality. The future apartment complexes will add spaces, but they will charge for them, and that will lead to our street becoming a parking lot. I used to drive around forever when I lived downtown just so I wouldn't have to pay for parking, people will do the same here and just walk down our hill to their cars to go to work or, they will park in front of our houses in the morning and walk up the hill to catch the light-rail. Either way, our street will be filled with cars. This matters because our homes were built in the 50's, they all have one car driveways, we have three cars in our family alone. We have to park on the street and so do many other residents, we need a plan for this and I have not heard one as of yet. 63-1

I'm not against density and I don't fear change. I think if we are smart about providing the proper amount of density to the 130th street station area and prepare properly for the effect this will have on the residents that already live here in our single home lots then this whole thing may work. But given how this entire station came about, where it was built (north of 125th st? Why?), and the history our neighborhood has had trying to work with the city on basic services, I'm not optimistic.

My wife and I bought our home so we could live in a neighborhood, we pay our property tax which will only skyrocket now, and I want to leave this house to my son. I just hope there is a neighborhood left and that he can afford to keep it. So I am against the high-density options in the plan, and I don't want developers to get a blank check to cut down our trees with just a promise to plant new ones as a fix. So I guess I am for keeping things the same. I hope I do have a say in this decision, after all, we were here first.

Mark Kramer
13006 8th Ave. NE.

...live your life

DCL Management LLC.

VISTA PACIFIC GROUP
COMMERCIAL PROPERTIES

May 3, 2024

Office of Planning and Community Development
Seattle City Hall
600 4th Avenue, 5th Floor
Seattle, WA 98104
Attn: Rico Quirindongo
Email: PCD_CompPlan_EIS@seattle.gov
Email: OneSeattleCompPlan@seattle.gov

Re: One Seattle Plan
4552 University Way NE - Support for Alternative 5

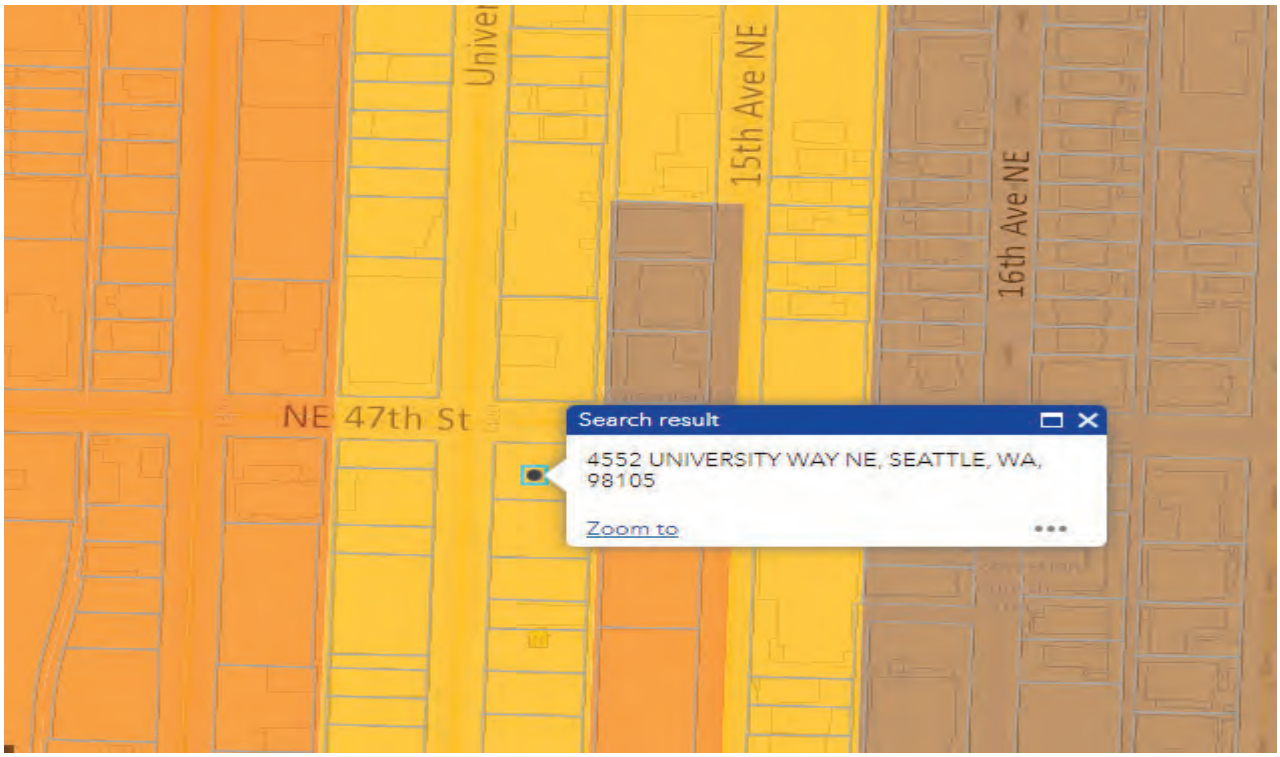
Dear Mr. Quirindongo,

DCL UW, LLC, is the owner of the property located at 4552 University Way NE, on the corner of 47th Street and "The Ave" in the heart of the U District. Thank you for the opportunity to comment on the One Seattle Comprehensive Plan Draft Environmental Impact Statement ("DEIS").
We write to express support for Alternative 5, but request that the Final EIS study mixed-use zoning of up to 240 feet in height along University Way NE at least north of NE 46th Street to encourage mixed-use redevelopment of the Property and surrounding north Ave properties. Zoning similar to the adjacent Seattle Mixed zone would be more consistent with the City's Urban Village concept, including the opportunity for dense multifamily housing near transit in a neighborhood that greatly needs it. 64-1

The Property is 8,240 sf in area and is currently occupied by a two-story retail building. Located in close proximity to light rail and bus stops, the University of Washington campus, and the Ave's prime retail corridor, the Property presents an ideal opportunity for mixed-use redevelopment.

Nearby properties have recently been zoned Seattle Mixed with height limits upwards of 240 feet, as shown below, reflecting the city's commitment to accommodating increased residential density and fostering vibrant urban centers. Applying this increase to the Property and nearby properties as well would align with the City's policy goals for the U District and for the One Seattle Plan more generally: promoting greater residential density and

enhancing transit-oriented development.
We understand that the business community on University Way south of NE 45th Street does not seek additional density in that location due to the retail character of that portion of the Ave. The Property and other sites further to the north, however, are appropriate candidates for mixed-use redevelopment that maintains the distinctive nature of the neighborhood while allowing more residents and visitors to access and enjoy it. We encourage OPCD to study Seattle Mixed densities with height limits up to 240 feet, similar to those of the surrounding areas, for the northern section of the Ave above at least NE 46th Street, including the Property. While 240 feet may be the upper envelope of what makes sense for urban design, this will support evaluation of additional heights such as 120 or 160 feet that may support redevelopment of this area. This will help the City to better understand the potential benefits and impacts and be ready to adopt any necessary zoning. We believe this will not only support the U District's objectives but also contribute to the overall livability and sustainability of our neighborhood.



64-1 cont

Additionally, we urge OPCD to prioritize the completion of the U District subarea plan, ideally by the end of 2025. The timely completion of this updated subarea plan, and any zoning changes that are necessary, is essential for providing clear guidance and direction for future development initiatives in the U District, support the One Seattle Plan vision and meet the unique needs of our neighborhood. Please do not hesitate to reach out if we can provide any further information or assistance.

Sincerely,

Dexter Lai
DCL UW, LLC
P: 206.851.9167
E: DexterL@dclmanagement.com

cc: Councilmember Rivera

Letter 65

DCL Management LLC.

VISTA PACIFIC GROUP
COMMERCIAL PROPERTIES

May 3, 2024

Office of Planning and Community Development
Seattle City Hall
600 4th Avenue, 5th Floor
Seattle, WA 98104
Attn: Rico Quirindongo
Email: PCD_CompPlan_EIS@seattle.gov
Email: OneSeattleCompPlan@seattle.gov

Re: One Seattle Plan
4552 University Way NE - Support for Alternative 5

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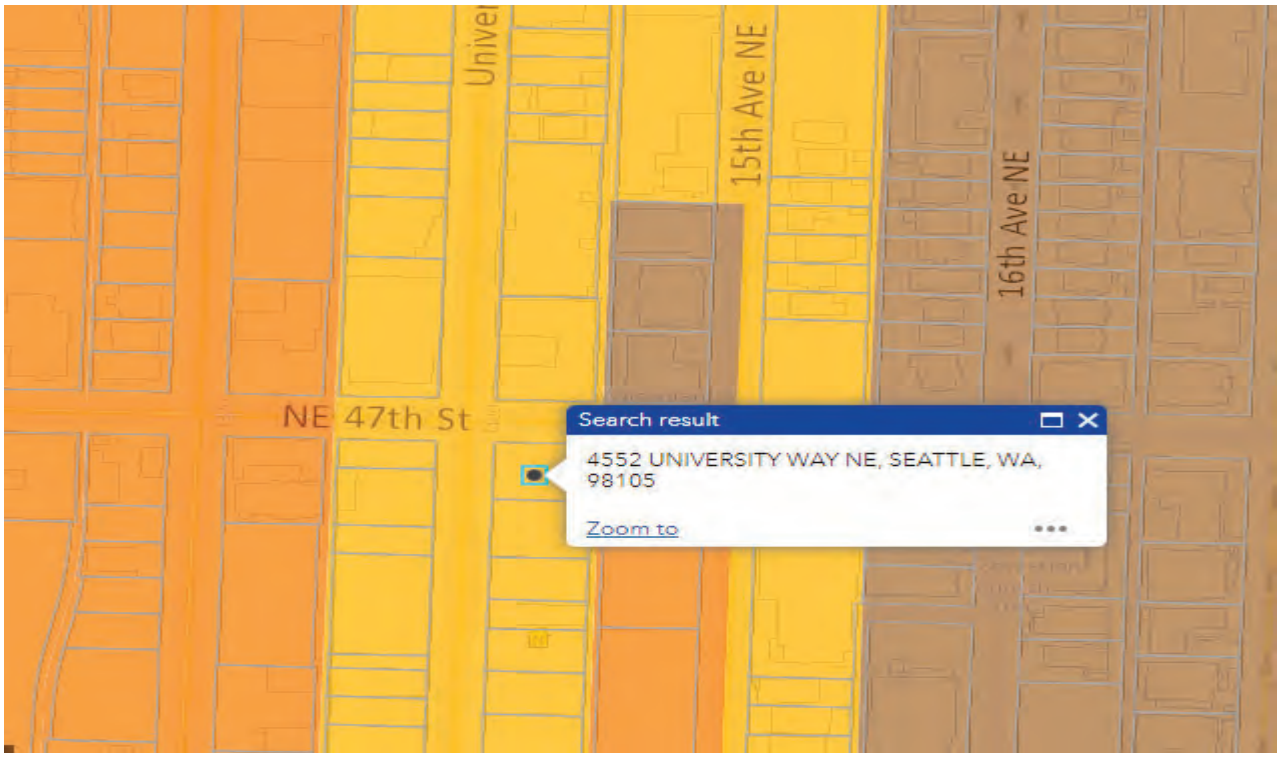
65-1 cont



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Sincerely,

Dexter Lai
DCL UW, LLC
P: 206.851.9167
E: DexterL@dclmanagement.com

cc: Councilmember Rivera

May 6, 2024

VIA ELECTRONIC MAIL

Office of Planning and Community Development
Seattle City Hall
600 4th Avenue, 5th Floor
Seattle, WA 98104
Attn: Rico Quirindongo
Email: PCD_CompPlan_EIS@seattle.gov
Email: OneSeattleCompPlan@seattle.gov

Re: One Seattle Comprehensive Plan Draft Environmental Impact Statement
Lander Street Owners Comment

Dear Mr. Quirindongo,

We write as industrial property owners and business operators in the Greater Duwamish Manufacturing Industrial Center (Duwamish MIC) to the One Seattle Comprehensive Plan (One Seattle Plan) Draft Environmental Impact Statement (DEIS). Collectively, we own over 25-acres around the expanded Lander Street light rail station (the Properties). As you know, the City included the Properties in the Industry and Innovation U/160 zone with the Industrial and Maritime Strategy.

Adopting the Industrial and Maritime Strategy was a monumental accomplishment. But there is more planning work needed to refine and implement the future of the Duwamish MIC, especially within the reasonable walkshed of the expanded Lander Street light rail station. We believe the One Seattle Plan should study policies to allow a "Lander Center" node transit-oriented development concept – potentially including residential (with workforce housing units), industrial, office, entertainment, hospitality, schools, hospitals, and training facilities – at the expanded Lander Street station. *Attachment A* (Concept Study). A "Lander Center" node could support thousands of new units – including workforce units for our City's labor workforce – immediately adjacent to light rail. Additionally, the "Lander Center" node could provide for new partnerships with local schools and/or labor stakeholders for industrial and maritime training facilities in the Duwamish MIC. 66-1

With the adoption of the Industry and Innovation U/160 zone for the Properties, there is the potential for millions of square feet of industrial, office, and information computer technology use. Given the current economic climate, however, this vision for the Industry and Innovation zone is unlikely to be accomplished within the timeline of the One Seattle Plan. The "Lander Center" node concept mirrors the Mayor's Urban Centers vision as those areas near light rail stations where there is a wide range of housing and non-residential uses and building heights of greater than eight stories.

As you know, the Comprehensive Plan encourages this type of long-range planning exercises for the future of industrial lands to occur primarily as part of the major Comprehensive Plan update. *See* Policy LU 13.3. The City has also recognized that "unique development opportunities" such as the WOSCA site and the National Guard Armory in Interbay can be evaluated through a "comprehensive industrial redevelopment plan" that considers public benefits. *See* Policy LU 13.27.

Overall, the One Seattle Plan DEIS does not propose or evaluate land use changes to the Duwamish MIC. As owners around the Lander Street station, we respectfully request that the One Seattle Plan:

- Study the "Lander Center" node. The Final EIS for the One Seattle Plan should study the potential for a "Lander Center" node within a reasonable walkshed of the Lander Street station, including the potential for Urban Center-type transit-oriented development (TOD) with a housing component. Public benefits with the "Lander Center" note could include, but are not limited to, workforce housing, transportation impact fees dedicated to Duwamish MIC freight mobility improvements, green infrastructure, district energy, climate resiliency measures, industrial and maritime training program partnerships, or workforce equity commitments, among other benefits. The "Lander Center" node planning process would help identify and refine priority benefits and incentives that could be realized with a TOD zone in this assemblage.

- "Lander Center" master planning. We applaud the Mayor's leadership with the master planning for the WOSCA site in collaboration with Washington State Department of Transportation and the C40 Reinventing Cities organization. This is precisely what the Comprehensive Plan calls for with LU Policy 13.27. Alternatively, if the scope and timing does not allow for the "Lander Center" node concept to be thoroughly evaluated in the Final EIS for the One Seattle Plan, we encourage the City to recognize (or amend as needed) Policy LU 13.27 to specifically include our Properties – which are the largest (and only) contiguous assemblage over 25-acres in the Duwamish MIC within minutes of a light rail station – to be recognized as "unique development opportunity" and start a master planning process similar to the WOSCA efforts.

- Industry and Innovation "Look Back". The City, either as part of the "Lander Center" node concept or as part of the implementation of the One Seattle Plan, should evaluate the implementation of the Industry and Innovation zone around light rail stations. The City should evaluate whether the permitted uses, non-industrial size limitations, densities, incentives, and development standards are conducive to private investment in the Duwamish MIC. The "Look Back" effort should include interviews with private sector owners, investors, and developers along with stakeholders from the Port of Seattle and maritime and industrial sectors about the opportunities and challenges to development in the Industry and Innovation zone. The Office of Planning and Community Development should make recommendations to the Mayor and City Council about what, if any, modifications to the current Industry and Innovation zone are recommended to encourage market-sector investment in the MIC around these zones.

- Industry and Innovation Major Institution Master Plan (MIMP) flexibility. In the new Industry and Innovation zone, the Seattle Municipal Code (Code or SMC) authorizes both hospitals and colleges as permitted uses. SMC 23.50A.040, Table A. However, major institutions (which are limited to large hospitals or post-secondary education uses) are only permitted within existing buildings in the Industry and Innovation zone. *Id.* We believe this was an oversight in the Industrial and Maritime Strategy process. The City should support the opportunity for new hospital and educational opportunities near light rail. Allowing the Major Institution Master Plan (MIMP) process for these potential uses

66-1 cont

here would provide additional flexibility and benefits to the Duwamish MIC. We encourage the City to resolve this use issue in the Code as part of the One Seattle Plan.

We encourage the City to explore the "Lander Center" node concept in the One Seattle Plan, or alternatively, to announce that the "Lander Center" node will be studied through a master planning exercise similar to the WOSCA efforts that are underway. This is a tremendous opportunity to meet the City's vision for a vibrant, innovative industrial/housing TOD future for the Lander Street area.

66-1 cont

Thank you for your consideration. Please feel free to contact me with any questions.

Sincerely,

Ted Lehmann
Stack Industrial Properties

Bob Gillespie
Lander Street Partners LLC

Natalie & Lorna Soules
Sixth & Stacy, LLC & Eight & Stacey, LLC

Henry Liebman
American Life, Inc.

Enclosures: Lander Center node concept plan

cc: City Council
Deputy Mayor Burgess

Parcel #	Taxpayer Name	Address	Lot Area (sq. ft.)
7666204452	Rainer Pacific Co	2201 6th Ave S 98134	35,910
7666204450	Stack Industrial Prop	2225 6th Ave S 98134	42,390
7666204449	WES 2233 LLC	2233 6th Ave S 98134	61,419
7666204355	Lander at Sixth LLC	No address	68,808
7666204385	Prime NW LLC	2425 6th Ave S 98134	11,280
7666204380	Lander at Sixth LLC	2437 6th Ave S 98134	10,320
7666204375	Rainer Pacific Co	2447 6th Ave S 98134	19,800
7666204371	Lander at Sixth LLC	560 S Lander St 98134	9,000
7666203501	Sixth and Stacy LLC	2400 6th Ave S 98134	71,060
7666203540	Eighth and Stacy LLC	733 S. Stacy St 99134	32,080
7666203536	Eighth and Stacy LLC	No address	34,847
7666203710	Lander Street Prtn.	625 S Lander Street	21,600
7666204345	Lander Street Prtn.	545/555 S. Lander St.98134	12,000
7666204346	Lander Street Prtn.	505 S Lander St 98134	20,400
7666203534	American Life	8th Ave S. 98134	42,900
7666203530	American Life	2450 6th Ave S. 98134	89,990
7666203660	Canal Boiler LP	2702 6th Ave S. 98134	14,400
7666203664	2724 6th Ave S. LP	2724 6th Ave S 98134	22,800
7666203665	2724 6th Ave S. LP	2724 6th Ave S 98134	13,200
7666203675	American Life & Industrial	2752 6th Ave S. 98134	28,800
7666203700	2724 6th Ave S. LP	7th Ave S. 98134	7,200
7666204225	2700 4th Ave S. LP	2700 4th Ave S 98134	56,862
7666204245	2700 4th Ave S. LP	2724 4th Ave. S. 98134	7,938
7666204256	GoodLeavitt2730 LLC	2730 4th Ave S. 98134	48,600
7666204275	Watts Joanne	2742 4th Ave S. 98134	25,200
7666204280	Watts Joanne	2760 4th Ave S. 98134	39,600
7666204180	South Forest LLC	2900 4th Ave S. 98134	48,600
7666204189	Watts Joanne	2924 4th Ave S. 98134	14,080
7666204190	Watts Joanne	2932 4th Ave S. 98134	34,520
7666204200	Pacific Industrial Center	2960 4th Ave S. 98134	108,000
7666204165	Pacific Industrial Center	3200 4th Ave S. 98134	55,080
Total Sq.Ft.			1,108,684
Total Acres			25.45

Letter 67

SECURITY PROPERTIES

May 6, 2024

Rico Quirindongo, Director
Jim Holmes, Strategic Advisor
City of Seattle Office of Planning and Community Development
P.O. Box 94788, Seattle, WA 98124-7088
P: 206-684-8372

Via email to OneSeattleCompPlan@seattle.gov and PCD_CompPlan_EIS@seattle.gov

Dear Director Quirindongo and Mr. Holmes,

Security Properties, a Seattle based developer since 1969, is writing in support of the Draft One Seattle Plan and its Neighborhood Center goals ***with a request to resolve conflicts with the City's Principal Pedestrian Street zoning and the goals outlined in the Plan, and to study such changes in the Final Environmental Impact Statement ("FEIS")***.

Currently, we are proposing a new mixed-use development at 35th Avenue NE and 85th Street, called "Wedgewood Center," which is identified at the heart of a Neighborhood Center node in the One Seattle Plan. Based on our research, Wedgewood Center is the only large project within a proposed Neighborhood Center that is in Design Review, which means we are ahead of the zoning changes contemplated to meet density goals and create complete neighborhood communities. But even though we are ahead of the contemplated changes, we believe our project perfectly fits the Neighborhood Center vision, articulated as: "*[p]laces with an important local role due to a variety of housing located around a commercial core…that provides an opportunity for people to access everyday needs within a short walk or bike ride from their homes.*" Plan at 19. The Plan further states developments in Neighborhood Centers should provide "*shops, services, grocery stores, restaurants, and other businesses that residents need to access on a regular basis.*" Plan at 26. 67-1

Our proposal is to redevelop a 1960's era surface parking strip mall into a mixed-use development that connects community and provides opportunities for neighbors to access everyday needs. The 6-story, 338-unit project would incorporate ground-level retail, a grocer, a daycare, a mid-block plaza with covered outdoor seating, and below-grade and surface-level accessible parking. It would also retain significant (now called Tier 2) on-site and off-site trees. The project is strongly supported by the Wedgewood Community Council and individual community members, and it appears to be exactly the sort of mixed-use, service-oriented project that the City desires in Neighborhood Centers. We are increasingly concerned, however, that the restrictions in the existing zoning that have lead the project to request five departures will stymie the development process. We request you reevaluate these problematic zoning standards as soon as possible as part of the comprehensive planning and ongoing environmental review process so that the project and others like it can proceed.

701 Fifth AVENUE, SUITE 5700
SEATTLE, WA 98104
T | 206 622.9900 F | 206 628.8031
WWW.SECURITYPROPERTIES.COM

A. Current Zoning Conflicts – Decisions to be Made Now

Wedgwood Center is located on a Principal Pedestrian Street which means curb cuts are prohibited from abutting 35th Avenue without departures. However, we need a single curb cut to access a total of 16 short-term, accessible surface parking stalls for the grocer and childcare center uses. (The site currently has three curb cuts along 35th Avenue so this would be a net reduction.)

Based on the pedestrian street zoning, SDCI staff oppose the single curb cut which has already resulted in a more challenging, time consuming, and expensive review. SDCI staff did not support our departure at the first EDG meeting and we are now tasked with returning to the Design Review Board for a second EDG meeting with the prospect of being denied again.

We do believe that our departure is supported by the One Seattle Plan which sates:
"In planning for how to use streets, we consider the need to provide space for pedestrian activities, travel ways for various types of vehicles, and a flex area along the curb for making transitions and addressing critical building access and loading needs. Pedestrian activities include walking as well as access to bus shelters, bike racks, and sidewalk cafés. The curb provides space for passenger and freight delivery, solid waste collection and storage, vehicle and bike parking, bus stops and layover." (One Seattle Plan, Page 67)

67-1 cont

B. Why Support a Single Curb Cut and More Flexibility in Neighborhood Centers

A grocery store has been an anchor tenant of the Wedgwood Center for decades, until QFC closed in 2021. The return of a grocery is clearly desired by the local community with overwhelming support at the EDG meeting and in comments submitted to SDCI. In addition, the One Seattle Plan has a stated goal to ***Provide a Neighborhood "Healthy Food System"*** in support of local grocery stores. (page 152).

As a leader in developing mixed-use grocery and residential buildings, we know that short-term parking is a requirement for a successful store. In Seattle, we built the Epicenter in Fremont (PCC), Ballard on the Park (QFC), and Angeline in Columbia City (PCC) and we recently entitled the Magnolia Village Condominium (Safeway) development.

All of the grocery brands that we have engaged have cited the need for short-term, surface parking to be competitive with the Lake City Fred Meyer, Wedgewood Safeway, and Sandpoint MET Market, which are all surface parking storefronts. We believe failure to deliver the curb cut will be a deal breaker, especially in today's marketplace with grocer mergers, store closures, and economic uncertainty. The City should consider this feedback carefully as it designs future zoning for Neighborhood Centers where access flexibility will be key to delivering the services envisioned.

A. Our Request

We specifically request the City identify and study in the FEIS removal of Pedestrian-zone curb cut access restrictions as part of implementing zoning changes for the One Seattle Plan so that our project could move forward as of right. SDCI is challenging the feasibility of a project that

clearly meets the vision for Neighborhood Centers. The project was even featured in the Seattle Times article: "Seattle studies dozens of sites for housing growth. These 24 got picked."

Security Properties cannot afford to pause and wait until the City adopts the One Seattle Plan and implementing zoning next year. Although we are requesting that the City study broader access flexibility in Neighborhood Centers in the comprehensive planning and EIS process, we are also asking for Wedgwood Center be permitted to move forward with a design that reflects the goals of the One Seattle Plan ahead of full implementation, and that the City support the project through any means possible, including support for the departure or an interim zoning change.

67-1 cont

B. Substantial Community Support for the Curb Cut

We have spent the past 16 months ensuring that our development reflects neighborhood planning goals and provides identified community benefits. We consider the Wedgwood Community Council to be our community-based partner (see attached letter) and have had significant public support during the EDG process. We will follow up with a request to meet with the Mayor's Office and Councilmember Maritza Rivera who represents District 4 and the Wedgwood community to discuss how our project can lead in implementing the vision for Neighborhood Centers outlined in the One Seattle Plan.

Thank you for this opportunity to comment.

Sincerely,

John Marasco, Chief Development Officer
Security Properties

Letter 68

PROLOGIS

May 6, 2024

VIA EMAIL

Office of Planning and Community Development
Seattle City Hall
600 4th Avenue, 5th Floor
Seattle, WA 98104
Attn: Jim Holmes
Email: PCD_CompPlan_EIS@seattle.gov

Re: One Seattle Plan Comment
2300 26th Avenue South – North Rainier Urban Center

Dear Mr. Holmes,

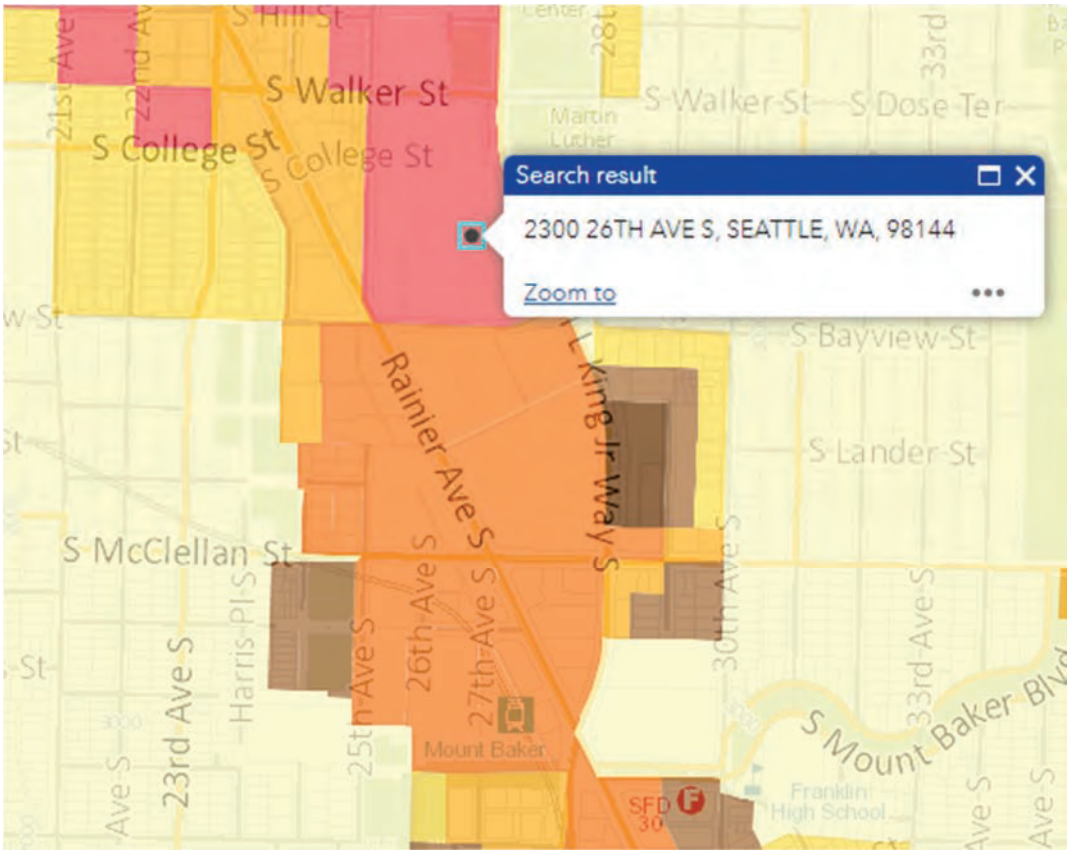
On behalf of Bayview Walker, LLC, which is a subsidiary of Prologis LP ("Prologis"), which owns the property at 2300 26th Avenue South ("Property"), thank you for the opportunity to comment on the One Seattle Comprehensive Plan Draft Environmental Impact Statement ("DEIS"). We are writing to support the Mayor's One Seattle Plan Alternative 5 growth strategy. The Property is located within the future North Rainier Urban Center. We encourage the City to consider leveraging the Property's proximity to transit and the Seattle Mixed zoning directly to the south by extending the Seattle Mixed zoning designation to include our Property. Seattle Mixed zoning for our Property within the new North Rainier Urban Center would better align the zoning with the City's One Seattle Plan goals.

The Property (in yellow on the image to the right) is approximately 10 acres in size and currently houses single-story warehouse and office buildings constructed between 1953 and 1980, and surface parking. The Property is currently vacant. It is located just over a half-mile walking distance from the Mt. Baker light-rail station and is directly across Rainier Avenue South from the City's Martin Luther King Jr. Memorial Park. Consistent with its location in the currently designated Mount Baker Hub Urban Village, the Property is surrounded by a mix of neighborhood commercial, retail, and residential uses.

68-1

The Property is currently zoned Commercial 2 with a 75 foot height limit. Immediately to the south along S. Bayview St., the zoning changes to Seattle Mixed North Rainier with a maximum height of 145 feet.

We agree with the City's proposed growth strategy with the new North Rainier Urban Center, where areas generally within a half-mile of light rail should be destination areas for the City with a wide range of housing, jobs, services, retail and public infrastructure. We also agree that taller heights and increased density should be encouraged around light rail. The Property, which is currently vacant, provides an excellent opportunity for a significant transit-oriented development within the approximate half-mile walkshed of the Mt. Baker light rail station and adjacent to the City's Martin Luther King Jr. Memorial Park. We believe that the North Rainier Urban Center plan would be better implemented with the Property as Seattle Mixed North Rainier zoning like our neighboring parcels to the south (as shown below).



68-1 cont

The DEIS assumes that the Mount Baker Hub Urban Village/future North Rainier Urban Center will include a net new housing target of 1,242 units and up to 3,053 net new jobs (for the No Action Alternative. The Final Environmental Impact Statement ("FEIS") should study increased housing and jobs targets for the North Rainier Urban Center using the Seattle Mixed Zoning for our Property and similarly situated properties north of S. Bayview Street within an approximate half-mile of light rail. This will help the City evaluate the potential benefits, and any environmental impacts, of expanding the zoning capacity with the North Rainier Urban Center to better meet the City's One Seattle Plan goals.

We appreciate the City's consideration. Please feel free to contact me with any questions.

Sincerely,

Jake Maxwell

May 6, 2024

VIA ELECTRONIC MAIL

Office of Planning and Community Development
Seattle City Hall
600 4th Avenue, 5th Floor
Seattle, WA 98104
Attn: Jim Holmes; Rico Quirindongo
Email: PCD_CompPlan_EIS@seattle.gov

Re: One Seattle Comprehensive Plan Draft Environmental Impact Statement

Dear Mr. Quirindongo,

Thank you for the opportunity to comment on the One Seattle Comprehensive Plan Draft Environmental Impact Statement ("DEIS").

IPB Properties ("IPB") is the owner of the half-block located at 2700 1st Avenue in Belltown (the "Property"). IPB is in the process of obtaining a Master Use Permit for the redevelopment of the Property for residential and retail units (the "Project"). 69-1

Unfortunately, current zoning limits the height of the Project to 145 feet. Given current market conditions, it is not feasible to develop a project to this limited height. Even in favorable market conditions, 145 feet provides very little development capacity above the height at which "high-rise" code requirements are triggered. Those requirements impose substantial costs on any residential project and more significant heights are required to amortize these costs over a larger development yield. Present market conditions only exacerbate this challenge, with construction costs remaining high and capital markets nearly frozen.

ipb Properties

Seattle Branch
IPB Properties
116 Fairview Ave North, 147
Seattle, Washington, USA
98109

Nashville Branch
IPB Properties
1033 Demonbreun Street, 300
Nashville, Tennessee, USA
37203

Thus, additional height and density are necessary in order to render the Project – or any project in this area of Belltown – feasible. Fortunately, there is an opportunity through the current Comprehensive Plan update to lay the groundwork for such enhanced heights and density. The current zoning in Belltown was effectively adopted in 1986 – almost 40 years ago. In the time since, the City has upzoned virtually every other square inch of Downtown, but not Belltown. For example, heights in nearby DMC zones have increased 200 feet, an 83% height increase since 1986. Heights in this portion of Belltown have increased only 20 feet – or about 15% -- as a result of the MHA rezone in 2017.

69-1 cont

It is time to remedy this condition and adjust heights and densities for residential projects in Belltown upward, consistent with the City's rezoning actions throughout the rest of Downtown. Our suggestions are as follows:

- Increase maximum height to 280 feet.
- Increase allowable average tower floorplate to 14,000 square feet.
- Eliminate maximum lot coverage requirements.
- Increase non-residential FAR to 6

These Code modifications would allow for financially feasible high-rise multifamily development, as well as other desired urban amenities such as structured parking and pedestrian-oriented improvements that align with the City's vision for Regional Centers. And they would bring the scale and development potential of Belltown into conformance with the remainder of Downtown. We support Alternative 5 in the DEIS, and we urge you to take action in the Comprehensive Plan update to provide for such appropriate development in the Belltown neighborhood.

Sincerely,

David McCutcheon
Vice President, US Operations
IPB Properties Inc.

ipb Properties

Seattle Branch
IPB Properties
116 Fairview Ave North, 147
Seattle, Washington, USA
98109

Nashville Branch
IPB Properties
1033 Demonbreun Street, 300
Nashville, Tennessee, USA
37203

Letter 70

McCULLOUGH HILL PLLC

May 6, 2024

VIA ELECTRONIC MAIL

Office of Planning and Community Development
Seattle City Hall
600 4th Avenue, 5th Floor
Seattle, WA 98104
Attn: Jim Holmes; Rico Quirindongo
Email: PCD_CompPlan_EIS@seattle.gov

Re: One Seattle Comprehensive Plan Draft Environmental Impact Statement

Dear Mr. Quirindongo,

70-1

Thank you for the opportunity to comment on the One Seattle Comprehensive Plan Draft Environmental Impact Statement ("DEIS"). We are writing on behalf of Graham Street Realty, the owner of the "Interbay Worklofts" located at 1631 15th Avenue W. (the "Property"). The Interbay Worklofts provides small spaces for craft work, "maker" uses and small-scale business and industrial activities of all kinds. These "maker spaces" serve a critical function in Seattle's industrial environment, by providing affordable incubator spaces for new and emerging businesses.

In the Industrial Lands rezone of 2023, the City took steps to support and promote such maker spaces in the UI zone, by allowing (subject to various conditions) limited residential uses in that zone. We are writing to suggest that a similar approach is warranted on certain properties in the II zone.

The II zone was developed to provide opportunities to preserve and enhance industrial uses, including information and computer technology uses, in certain areas of the City. Most of these II-zoned areas are located on high-capacity transit corridors or within walking distance of light rail. However, present conditions in the market indicate that the demand for many II uses has substantially softened in Seattle. Further, some existing buildings in the II zone are not well-suited to conversion to such II uses.

Interbay Worklofts is one such example. Given the small size of the suites in the project, it is not designed to accommodate the larger-scale uses allowed in the II zone. But this collection of maker

spaces is ideally suited for the kind of live-work environment supported in the UI zone. Significantly UI zoning is located immediately north of the Property on the east side of 15th Avenue W.

70-1 cont

For these reasons, we would ask the City to consider adding a live-work component to the II zone, similar to the concept in the UI zone, but only for smaller-scale existing buildings in the II zone. Such a measure would significantly enhance the value of these maker spaces to the incubator community, by allowing multi-use of the spaces for maker purposes and for residential use, as well as contributing to housing affordability in the industrial areas.

Sincerely,

John C. McCullough

Proposed Text Amendment
Residential Uses in Existing Buildings in II zones

Residential use in II zones. Residential uses are permitted as an administrative conditional use in II zones if all of the following criteria are met. The residential use may be part of a Major Phased Development.

1. The residential use shall be located in a structure existing as of January 1, 2010 and not exceeding 75,000 square feet in gross floor area; and

2. The residential use shall not exceed a density limit of 80 dwelling units per acre; and

3. The residential use shall not be located within 200 feet of a shoreline; and

4. The residential use shall be located adjacent to a non-industrial use; and

5. All dwelling units shall have sound-insulating windows sufficient to maintain interior sound levels at 60 decibels or below in consideration of existing environmental noise levels at the site. The applicant shall submit an analysis of existing noise levels and documentation of the sound insulating capabilities of windows as part of the conditional use permit application; and

6. All dwelling units shall have a permanently installed air cooling system and a balanced ventilation system, which may be combined. The ventilation system shall filter any outdoor air supply through filters rated MERV 13 or higher as determined by the American Society of Heating, Refrigerating, and Air Conditioning Engineers (ASHRAE). The air cooling and ventilation systems shall be indicated on the plan; and

70-1 cont

7. The residential use shall be located, designed, and configured in a manner to reduce potential conflict with adjacent existing industrial business operations; and

8. The owner(s) of a building seeking a conditional use for the residential use must sign and record a covenant and equitable servitude, on a form acceptable to the Director, that acknowledges that the owner(s) and occupants of the building accept the industrial character of the neighborhood and agree that existing or permitted industrial uses do not constitute a nuisance or other inappropriate or unlawful use of land. Such covenant and equitable servitude must state that it is binding on the owner(s)' successors, heirs, and assigns, including any lessees of the residential use; and

9. The residential use shall be a part of a mixed-use development that includes non-residential uses permitted in II zones; and

10. Occupancies of dwelling units are voluntarily limited by the building owner to support the availability of housing that is affordable to area workers, such that the residential use consists of either:

a. All dwelling units are live-work units in which the commercial activity qualifies as industrial, or are caretakers' quarters associated with a business on the same site provided no single business shall have more than three associated caretakers' quarters; or

b. A minimum of 50 percent of the dwelling units are made available at affordable rent or affordable sale price for a period of 75 years beginning January 1 of the year following final certificate of occupancy to eligible households with annual incomes at or below 60 percent of median income for SEDUs, 80 percent of median income for studio and one bedroom units, and 90 percent of median income for two-bedroom and larger units. Standardized procedures and definitions established by the Office of Housing for administration of Chapter 5.73 shall apply. Dwelling units eligible for the multifamily housing tax exemption may be counted towards the minimum 50 percent.

70-1 cont

From: Ian Morrison
To: PCD_OneSeattleCompPlan; PCD_CompPlan_EIS
Cc: Rivera, Maritza; Strauss, Dan
Subject: Fremont Urban Center stakeholders Comp Plan comment
Date: Monday, May 6, 2024 3:25:58 PM
Attachments: East Fremont Urban Center Community EIS Comment Letter 5.6.2024.pdf

CAUTION: External Email

Dear Mayor, Councilmembers Rivera and Strauss, and OPCD staff,

On behalf of a coalition of property owners within the Fremont Urban Center that are currently zoned industrial commercial, please see the attached comment letter.

We hope that the City will use the One Seattle Plan process to finally align this community's zoning with the Fremont Urban Center's vision for mixed-use residential community. 71-1

Please feel free to contact me with any questions. Thanks.

Ian

Ian S. Morrison
Partner
McCullough Hill PLLC
701 Fifth Avenue, Suite 6600
Seattle, Washington 98104
Direct: (206) 812-3380
Cell: (253) 380-6781
imorrison@mhseattle.com
www.mhseattle.com

NOTICE: This communication may contain privileged or confidential information. If you have received it in error, please advise the sender by reply email and immediately delete the message and any attachments without copying or disclosing the contents. Thank you.

May 6, 2024

VIA ELECTRONIC MAIL

Office of Planning and Community Development
Seattle City Hall
600 4th Avenue, 5th Floor
Seattle, WA 98104
Attn: Rico Quirindongo
Email: PCD_CompPlan_EIS@seattle.gov

Re: One Seattle Comprehensive Plan Draft Environmental Impact Statement
Fremont Urban Center – Stone Way Property Owners' Comment

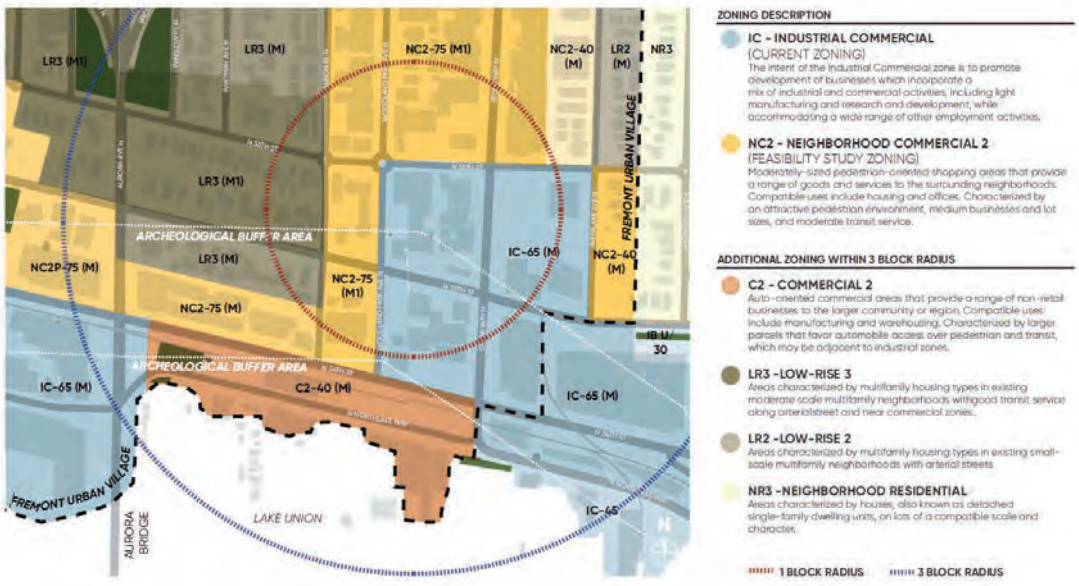
Dear Mr. Quirindongo,

We write as a coalition of property owners within the current Fremont Hub Urban Village located around Strone Way and N 35th Street. Thank you for the opportunity to comment on the One Seattle Comprehensive Plan Draft Environmental Impact Statement ("DEIS"), maps, and policies.

71-1 cont

Our properties are located within the current Fremont Hub Urban Village and **not** within a manufacturing/industrial center ("MIC") or shoreline environment; however, our properties are located within the roughly three and a half blocks that are currently zoned Industrial Commercial ("IC"). Our properties are surrounded by commercial and multifamily zoning inside the Hub Urban Village (see map below). Our properties were not an area of focus for the City's recent Industrial and Maritime Strategy update. We felt overlooked in the Industrial and Maritime Strategy process.

The City's One Seattle Comprehensive Plan process can help align our zoning with the rest of the proposed Fremont Urban Center and support a true, mixed-use neighborhood environment.



Specifically, our comments on the DEIS are:

- **Support for Fremont Urban Center**. We support the Fremont Urban Center designation, including our properties, to create a wide range of housing, restaurant, retail, and job growth. We agree with the City's vision that Urban Centers should support a "significant" share of housing and allow for up to 8-story mixed-use residential housing types. The final One Seattle Plan and land use maps must resolve the zoning inconsistencies presented by our isolated, incongruous area of IC-zoned land within the Fremont Urban Center by adopting Neighborhood Commercial zoning with appropriate heights for our properties.

- **Growth Assumptions**. The DEIS contemplates a net new target of 1,537 new housing units and upwards of 311 new jobs over the course of the Plan. The Stone Way corridor around our properties includes a vibrant mixture of new residential, commercial, and mixed-use retail and restaurant developments, including Brooks Sports headquarters, evo headquarters, and the evo Campus Seattle complex. Our properties, with appropriate Neighborhood Commercial zoning, could potentially support hundreds of new multifamily housing units and neighborhood-serving restaurants and retail to build on the energy and vibrancy established by the current and planned Stone Way projects. The Final Environmental Impact Statement ("FEIS") should study increased housing and jobs targets for our properties so that the City can better understand the potential benefits and impacts.

- Consistency with Policies. The One Seattle Plan includes Policy LU 13.11 that states:

  "**Avoid placing industrial zones** within regional, **urban** and neighborhood **centers**. However, in **locations where a center borders a Manufacturing and Industrial Center**, use of the industrial commercial zone within the center where it abuts the Manufacturing and Industrial Center to provide an appropriate transition to help separate residential uses from heavier industrial activities." (emphasis added)

  Also, Urban Center Policy 4.3 reads "Allow a **wide range of housing type**s in Urban Centers. Urban Centers should generally allow buildings of 3 to 8 stories." (emphasis added)

  Our properties are within the future Fremont Urban Center but are currently zoned Industrial Commercial. Our properties are not **within, nor bordering** a MIC. The nearest MIC is nearly one mile away. The current zoning does not allow any housing, except for a caretaker unit. Our properties' current zoning is flatly inconsistent with Policy LU 13.11 and the City's Urban Centers policies, including 4.3. The FEIS must study our properties' land use designation and zoning for consistency with the Growth Management Act and the current (and proposed) One Seattle Plan policies. Moreover, the obvious conclusion that that study should reach is that the current zoning is inconsistent and that neighborhood commercial zoning with appropriate heights is the right designation for our properties.

For these reasons, the City should take action in the One Seattle Comprehensive Plan update process to rezone these areas to match the rest of the Fremont Urban Center as Neighborhood Commercial zoning. The opportunity for residential and mixed-use development will support the Fremont Urban Center around Stone Way and better align with the City's Urban Center vision.

71-1 cont

Sincerely,

DocuSigned by:
Dennis Bruders
2024-May-02 | 13:06 PDT

Dennis Bruders

President

Bruders Ventures

Property Address:
1100 Nth 35th Street
Seattle, WA 98103

Sincerely,

William Ray, Managing Member
WRCRJV LLC
Owner of 3500 Stone Way North

Sincerely,

DocuSigned by:
Sonja Vonheim Condon

Sonja Vonheim Condon

President

ABC Enterprises, Inc.

Property Address:3525 Stone Way N.
Seattle, WA 98103

Sincerely,

DocuSigned by:
Robert Kleist
2024-May-06 | 13:38 PDT

Robert Kleist

Property Owner

N/A

Property Address: 3501/3503 Stone Way N., Seattle, WA 98103

Sincerely,

Helene Heglund
MRH Properties, LLC
206-618-1104
helenereed@comcast.net

Sincerely,

DocuSigned by:
Bryce Phillips
2024-May-04 | 08:50 PDT

Bryce Phillips
Evolution Projects
Manager of Campus Seattle LLC
Owner of 3524 Stone Way N, 3535 Interlake Ave N, 3511 Interlake Ave N and 1320 N 35th St.

Sincerely,

DocuSigned by:
2024-May-03 | 17:38 PDT

Georgia Rohlfing

Georgia Rohlfing

Dock Sportsbar & Grill

Property Address:
1102 North 34th
Seattle WA 98103

Sincerely,

Mark Magnussen

Owner of Stoneway Court, 3409 Stone Way N. Seattle, Wa 98103

71-1
cont

From: Candice Chevaillier
To: PCD_OneSeattleCompPlan; PCD_CompPlan_EIS
Cc: Rivera, Maritza; Strauss, Dan; pnorman@bellevuehealthcare.com; Candice Chevaillier
Subject: RE: Fremont Urban Center stakeholders Comp Plan comment
Date: Monday, May 6, 2024 4:17:53 PM
Attachments: Fremont_Community_EIS_Comment_Letter - 3509-3513 Stone Way - Norman.pdf

CAUTION: External Email

Dear Mayor, Councilmembers Rivera and Strauss, and OPCD staff,

Please find attached an additional letter from Peter Norman, owner of 3509-3513 Stone Way N, just received.

He is a part of a coalition of property owners within the Fremont Urban Center that are currently zoned industrial commercial, please see the attached comment letter. 72-1

We hope that the City will use the One Seattle Plan process to finally align this community's zoning with the Fremont Urban Center's vision for mixed-use residential community.

Thank you,
Candice.

Candice Chevaillier, CCIM
Principal
Lee & Associates | Pacific Northwest
Multifamily Team

D 206.773.2694
C 206.604.3400

DocuSign Envelope ID: 23453025-A7D7-4CD1-8F14-F9538EAD4469

May 1, 2024

VIA ELECTRONIC MAIL

Office of Planning and Community Development
Seattle City Hall
600 4th Avenue, 5th Floor
Seattle, WA 98104
Attn: Rico Quirindongo
Email: PCD_CompPlan_EIS@seattle.gov

Re: One Seattle Comprehensive Plan Draft Environmental Impact Statement
Fremont Urban Center – Stone Way Property Owners' Comment

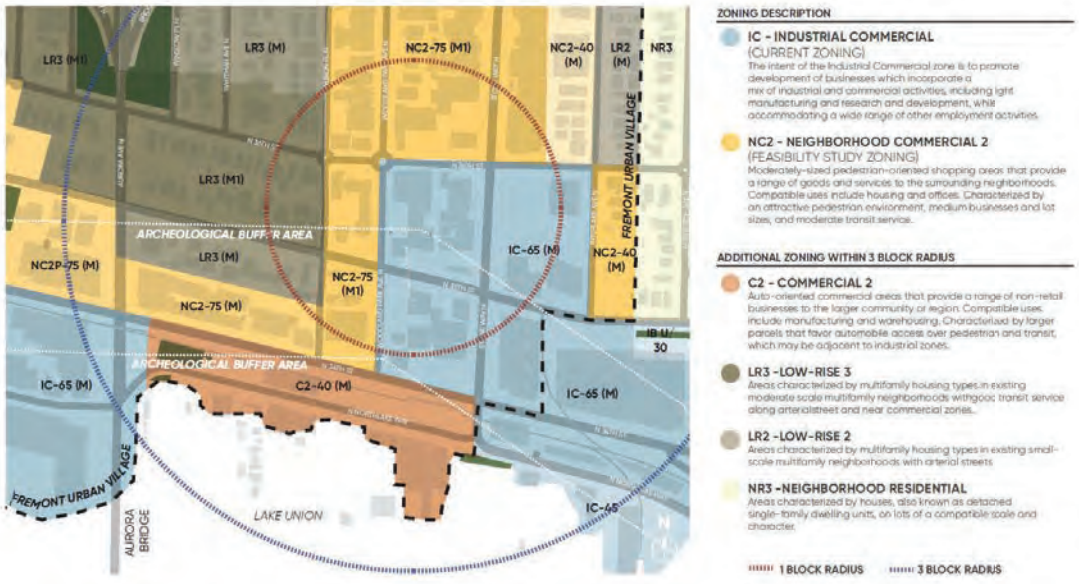
Dear Mr. Quirindongo,

We write as a coalition of property owners within the current Fremont Hub Urban Village located around Stone Way and N 35th Street. Thank you for the opportunity to comment on the One Seattle Comprehensive Plan Draft Environmental Impact Statement ("DEIS"), maps, and policies.

72-1 cont

Our properties are located within the current Fremont Hub Urban Village and **not** within a manufacturing/industrial center ("MIC") or shoreline environment; however, our properties are located within the roughly three and a half blocks that are currently zoned Industrial Commercial ("IC"). Our properties are surrounded by commercial and multifamily zoning inside the Hub Urban Village (see map below). Our properties were not an area of focus for the City's recent Industrial and Maritime Strategy update. We felt overlooked in the Industrial and Maritime Strategy process.

The City's One Seattle Comprehensive Plan process can help align our zoning with the rest of the proposed Fremont Urban Center and support a true, mixed-use neighborhood environment.



DocuSign Envelope ID: 23453025-A7D7-4CD1-8F14-F9538EAD4469

Specifically, our comments on the DEIS are:

- **Support for Fremont Urban Center**. We support the Fremont Urban Center designation, including our properties, to create a wide range of housing, restaurant, retail, and job growth. We agree with the City's vision that Urban Centers should support a "significant" share of housing and allow for up to 8-story mixed-use residential housing types. The final One Seattle Plan and land use maps must resolve the zoning inconsistencies presented by our isolated, incongruous area of IC-zoned land within the Fremont Urban Center by adopting Neighborhood Commercial zoning with appropriate heights for our properties.

- **Growth Assumptions**. The DEIS contemplates a net new target of 1,537 new housing units and upwards of 311 new jobs over the course of the Plan. The Stone Way corridor around our properties includes a vibrant mixture of new residential, commercial, and mixed-use retail and restaurant developments, including Brooks Sports headquarters, evo headquarters, and the evo Campus Seattle complex. Our properties, with appropriate Neighborhood Commercial zoning, could potentially support hundreds of new multifamily housing units and neighborhood-serving restaurants and retail to build on the energy and vibrancy established by the current and planned Stone Way projects. The Final Environmental Impact Statement ("FEIS") should study increased housing and jobs targets for our properties so that the City can better understand the potential benefits and impacts.

- Consistency with Policies. The One Seattle Plan includes Policy LU 13.11 that states:

  "**Avoid placing industrial zones** within regional, **urban** and neighborhood **centers**. However, in **locations where a center borders a Manufacturing and Industrial Center**, use of the industrial commercial zone within the center where it abuts the Manufacturing and Industrial Center to provide an appropriate transition to help separate residential uses from heavier industrial activities." (emphasis added)

  Also, Urban Center Policy 4.3 reads "Allow a **wide range of housing type**s in Urban Centers. Urban Centers should generally allow buildings of 3 to 8 stories." (emphasis added)

  Our properties are within the future Fremont Urban Center but are currently zoned Industrial Commercial. Our properties are not **within, nor bordering** a MIC. The nearest MIC is nearly one mile away. The current zoning does not allow any housing, except for a caretaker unit. Our properties' current zoning is flatly inconsistent with Policy LU 13.11 and the City's Urban Centers policies, including 4.3. The FEIS must study our properties' land use designation and zoning for consistency with the Growth Management Act and the current (and proposed) One Seattle Plan policies. Moreover, the obvious conclusion that that study should reach is that the current zoning is inconsistent and that neighborhood commercial zoning with appropriate heights is the right designation for our properties.

For these reasons, the City should take action in the One Seattle Comprehensive Plan update process to rezone these areas to match the rest of the Fremont Urban Center as Neighborhood Commercial zoning. The opportunity for residential and mixed-use development will support the Fremont Urban Center around Stone Way and better align with the City's Urban Center vision.

72-1 cont

DocuSign Envelope ID: 23453025-A7D7-4CD1-8F14-F9538EAD4469

Sincerely,

DocuSigned by:
PETER NORMAN
62DF36BBBFFB400...

2024-May-06 | 15:40 PDT

PETER NORMAN

Owner

Bixby Bridge

Property Address:

3509 Stone Way N, Seattle Wa
3513 Stone Way N, Seattle Wa

May 6, 2024

VIA EMAIL

Office of Planning and Community Development
Seattle City Hall
600 4th Avenue, 5th Floor
Seattle, WA 98104
Attn: Rico Quirindongo
Email: PCD_CompPlan_EIS@seattle.gov
Email: OneSeattleCompPlan@seattle.gov

Re: One Seattle Comprehensive Plan Draft Environmental Impact Statement
1102 North 34th Street – Request for Fremont Urban Center Appropriate NC Zoning

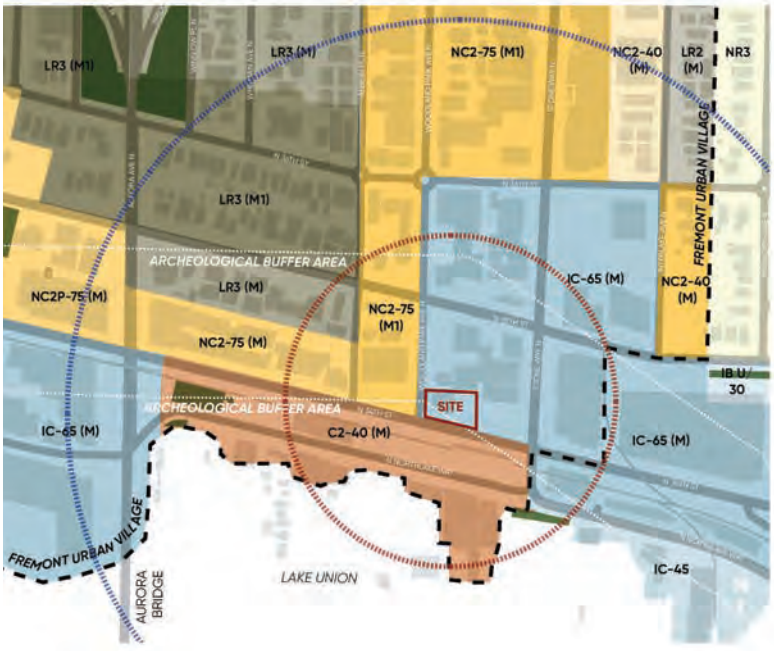
Dear Mr. Quirindongo,

Along with my mother, I own the property at 1102 North 34th Street in the Fremont area ("Property"). I'm writing to comment on the One Seattle Comprehensive Plan ("One Seattle Plan") Draft Environmental Impact Statement ("DEIS"), maps, and policies. I support the new Fremont Urban Center and respectfully ask that our Property be appropriately zoned for residential use.

Currently, our Property is in the Fremont Hub Urban Village. It is not located in a manufacturing/industrial center ("MIC"). Despite our location within the Fremont Hub Urban Village, our Property is currently zoned Industrial Commercial ("IC"). Our Property abuts the City's neighborhood commercial zoning to the west and commercial zoning to the south. (see below)

73-1

SITE & CONTEXT ANALYSIS ZONING CONTEXT



We are small property owners. Our property has a restaurant tenant. It is not an industrial use. We understand that the City went through a process to update the industrial plans and maps. We were not aware of that planning effort. If we were, I would have asked to be treated like the rest of our neighbors in the Fremont Hub Urban Village and given similar mixed-use residential zoning.

We believe the City's One Seattle Plan process should fix this oversight and make our zoning consistent with the rest of this new Fremont Urban Center to support a mixed-use neighborhood.

Our comments on the One Seattle Plan are below:

- **Support for Fremont Urban Center**. We support the Fremont Urban Center designation, including our Property, to create a wide range of housing, restaurant, retail, and job growth. We agree with the City's vision that Urban Centers should support a "significant" share of housing and allow for up to 8-story mixed-use residential housing types. The final One Seattle Plan and land use maps must resolve the zoning inconsistencies presented by our isolated, area of industrial commercially-zoned land within the Fremont Urban Center by adopting neighborhood commercial zoning with appropriate heights for our Property.

- **Update Growth Assumptions**. The DEIS contemplates 1,537 net new housing units in the Fremont Urban Center. Early feasibility studies suggest that our Property alone could support up to 75 units, depending on the zoning specifics. The One Seattle Plan Final Environmental Impact Statement ("FEIS") should study increased housing and jobs targets for the Fremont Urban Center including our Property, and the other industrial commercial zoned property inside the Urban Center, so that the City can better understand the potential benefits and impacts of increased zoning and be ready to easily adopt the zoning changes.

- **Remove from Industrial Zoning**. The One Seattle Plan includes Policy LU 13.11 stating:

  "**Avoid placing industrial zones** within regional, **urban** and neighborhood **centers**. However, in **locations where a center borders a Manufacturing and Industrial Center**, use of the industrial commercial zone within the center where it abuts the Manufacturing and Industrial Center to provide an appropriate transition to help separate residential uses from heavier industrial activities."

  Our Property is not in – or even near – a MIC. The City's own policies are clear that you should avoid placing IC zoning in the Fremont Urban Center. The City should study this issue in the FEIS for consistency with the Comprehensive Plan, including Policy LU 13.11. We believe the only reasonable conclusion after that study must be to change the zoning to match our Property with the Fremont Urban Center mixed-use zoning and 8 story heights.

For these reasons, we ask that the City update the Future Land Use Map and zoning as part of the Mayor's preferred alternative in the FEIS and One Seattle Plan to be consistent with the rest of the Fremont Urban Center zoned areas. We think that new mixed-use residential development on our Property supports the Fremont Urban Center and implements the Mayor's One Seattle Plan vision.

Thank you for your consideration. Please feel free to contact me with any questions.

73-1 cont

Sincerely,

s/Ula Rohlfing
Owner of 1102 North 34th Street

cc: Councilmember Rivera
Councilmember Strauss

HCMP Low Offices
Hillis Clark Martin & Peterson P.S.

May 6, 2024

By Email Only

Office of Planning & Community Development
Attn: Rico Quirindongo, Geoff Wentlandt, Michael Hubner, Brennon Staley, and Jim Holmes
City of Seattle
P.O. Box 94788
Seattle, WA 98124-7088
oneseattlecompplan@seattle.gov;
PCD_compplan_EIS@Seattle.gov

Re: *Comments to Draft One Seattle Plan and Draft EIS: Congregation Beth Shalom and 35th Avenue NE Neighborhood*

Dear OPCD One Seattle Planning Leadership:

This law firm represents Congregation Beth Shalom (the "Congregation"), a welcoming and inclusive synagogue on 35th Avenue NE in the Wedgwood neighborhood of North Seattle. The Congregation is a place where people meet to find family, friendship, support and understanding. In addition to the Congregation's worship activities, the institution provides high-quality and innovative life-long Jewish learning, and operates an Early Childhood Center that welcomes all children and their families, including those involved in Jewish life to varying degrees as well as non-Jewish families. The Congregation integrates compassion and social justice throughout all of its activities. 74-1

The Congregation recognizes and appreciates the complex and important comprehensive work that OPCD and the Mayor's Office are currently undertaking. Although the institution's internal strategic planning schedule unfortunately does not exactly align with the City's Comprehensive Planning cycle and comment deadlines, we provide this brief comment with respect to a key issue that is on the horizon for the Congregation.

The Congregation's primary structures, which currently house its worship and learning programs as well as its Early Childhood Center, are located at 6800 35th Avenue NE, or King County APN 4361200005. This parcel falls within a Frequent Transit Service Area. Under the current Future Land Use Map ("FLUM"), it is split between Multi-Family Residential and Neighborhood Residential. Today, this parcel is split-zoned between LR2(M) (shown in brown on the following page) and NR3 (light yellow).

Importantly, the Congregation also owns four parcels immediately to the north of its primary structure, at 6830-6842 35th Avenue NE. These parcels are also within a Frequent Transit Service Area, but they are all currently zoned NR3 and designated Neighborhood Residential under the current FLUM. The Congregation's five parcels are shown at right, with each of them marked by a small red circle. The four northerly properties are maintained by the Congregation and currently occupied by renters.

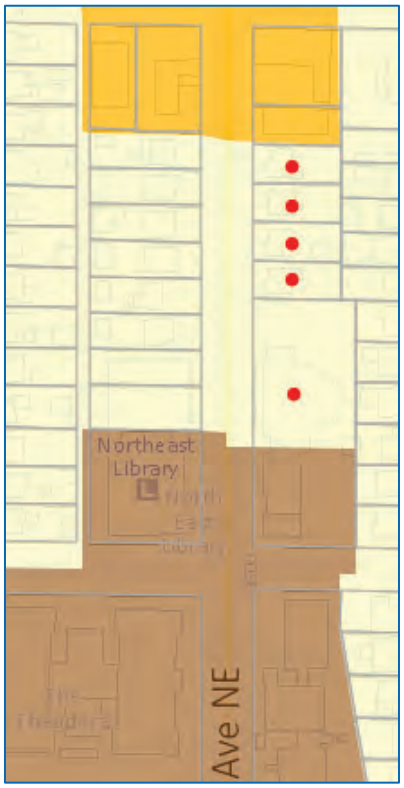


Figure 1. The Congregation's five properties (marked with red circles), with lowrise zoning shown in brown, neighborhood residential zoning showed in light yellow, and neighborhood commercial shown in mustard yellow.

Notably, the Congregation's Early Childhood Center is at full capacity and operating very successfully. Given the Congregation's ownership of the four parcels to the north of its primary structure, the Congregation is evaluating the feasibility of moving the Early Childhood Center into an expanded space on some or all of these parcels.

The Congregation believes that such a proposal would be of tremendous benefit both to the Congregation and to the larger community, given the critical and acute shortage of childcare options in Seattle.[1]

74-1 cont

1. Current Requests.

As excerpted on the following page, it appears that the current Draft Plan would downzone the future land use designation of the Congregation's southerly portion, and properties to the north of us, from *Multi-Family Residential* and *Commercial/Mixed-Use* to *Urban Neighborhood*. This draft map suggests that the entire stretch of 35th Avenue NE from the University of Washington to about NE 80th Street would be given the new FLUM's lowest-density residential designation.

The policies in the Draft Plan and the assumptions in the Draft Environmental Impact Statement ("DEIS") suggest that the proposed *Urban Neighborhood* status would contemplate **less** density than contemplated under either existing *Multi-Family Residential* or *Commercial/Mixed-Use*.

The Congregation asks that the Final Plan not make this significant change. As currently mapped and described in the Draft Plan, the change would represent a loss in walkable and transit-oriented potential and flexibility for this neighborhood generally and the Congregation specifically.

[1] *See, e.g.*, Daniel Beekman, Moriah Balingit and Sharon Lurye, *In WA and beyond, a child care crisis is holding parents back*, SEATTLE TIMES, Apr. 23, 2024.

The Congregation respectfully requests that the Final Plan's FLUM not proceed with the Draft Plan's proposed downzone of 35th Avenue NE to the Urban Neighborhood designation. For the Congregation's properties, the Congregation instead asks that that the Final Plan's FLUM use either the Corridor designation or the Neighborhood Center designation as studied in the Draft EIS. These designations much better represent the current traits of the Congregation's properties traits and the clear existing trends of the neighborhood.

Neighborhood Center or Corridor designations would much better align with the existing street, which is characterized by a range of walkable community anchors and "third places" like Seattle Public Library's North Branch, University Unitarian Church, Top Pot Donuts, Grateful Bread, and many other low-rise to mid-rise destinations for the walking, rolling and transit-riding community.

74-1 cont

In addition, in the Final Environmental Impact Statement, to help enable prospective flexibility for the Congregation and City policymakers, please ensure that the scope of study includes the possibility of a future of the Congregation's properties to NC1-40(M), to continue the zoning pattern provided to its northerly neighbors. Either of these zoning designations would align with the Neighborhood Center or Corridor designations requested above.

Figure 2. Excerpt from Draft Plan's FLUM, showing potential new designation of 35th Ave NE.

2. Pending Requests.

As mentioned above, the Congregation's strategic planning cycle unfortunately does not perfectly match with the City's comprehensive planning cycle, but the Congregation's volunteer and professional leadership have adjusted by speeding up its long-planned study of the feasibility of moving the Early Childhood Center into an expanded space on one or more of the Congregation's four northerly parcels. The Congregation's initial architectural analysis has shown that it could be difficult or inefficient to do so under the current NR-3 zoning, so the Congregation may need to seek a rezone. We hope OPCD would agree that such an expansion would help address a dramatic shortage in childcare that is a burden on Seattle workers and families.

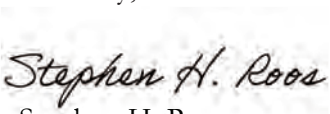
As part of feasibility study, the Congregation is currently evaluating whether to request a rezone of its four NR-3 zoned properties into NC1-40(M) zoning, to better match the Congregation's long-term needs and better align with the development pattern of its northerly neighbors.[2]

We would appreciate your partnership in identifying the Congregation's parcels for rezoning to NC1-40(M) as part of the Comprehensive Planning process. This action would support the potential for expansion of the Congregation's Early Childcare Center, and allow the

[2] If this is not possible, the Congregation may instead request that its properties be fully unified within the LR2(M) status that applies to the south half of its primary structure.

Congregation to efficiently align its properties with the Plan's larger policy goals, without needing to engage in a lengthy and potentially duplicative site-specific rezone process. Thank you for your consideration.

Sincerely,



Stephen H. Roos
Attorney for Congregation Beth Shalom

74-1
cont

CC: Marco Lowe, Chief Operating Officer

ND: 24307.002 4880-6097-7595v4

J. Selig Real Estate LLC
1000 2nd Avenue Suite 3210
Seattle, WA 98104

May 6, 2024

VIA EMAIL

Office of Planning and Community Development
Seattle City Hall
600 4th Avenue, 5th Floor
Seattle, WA 98104
Attn: Rico Quirindongo
Email: PCD_CompPlan_EIS@seattle.gov
Email: OneSeattleCompPlan@seattle.gov

Re: One Seattle Comprehensive Plan Comment
Support for Ballard Regional Center designation

Dear Mr. Quirindongo,

I write on behalf of J. Selig Real Estate, LLC ("JSRE"), which owns two properties located on Market Street in Seattle's Ballard neighborhood. Thank you for the opportunity to comment on the One Seattle Comprehensive Plan Draft Environmental Impact Statement ("DEIS"), policies, and maps.

JSRE is in strong support of the proposed Ballard Regional Center designation. I am a resident of Seattle District 6, which includes Ballard. I'm invested in our community. Currently, JSRE owns property at 1145 NW Market Street just one block east of the 15th Avenue and Market Street intersection. JSRE is under contract to buy property at 2501 NW Market Street just east of the Nordic Museum. These properties are ideally situated at key eastern and western "bookends" of the Market Street corridor, offering significant potential for true transit-oriented development that can contribute to the neighborhood's economic vitality and its environmental, transportation, and affordability goals. 75-1

I am Executive Vice President at Martin Selig Real Estate, LLC ("MSRE"), which owns, among other buildings, the 15th & Market Building in Ballard with over 200,000 sf. of office and commercial space.

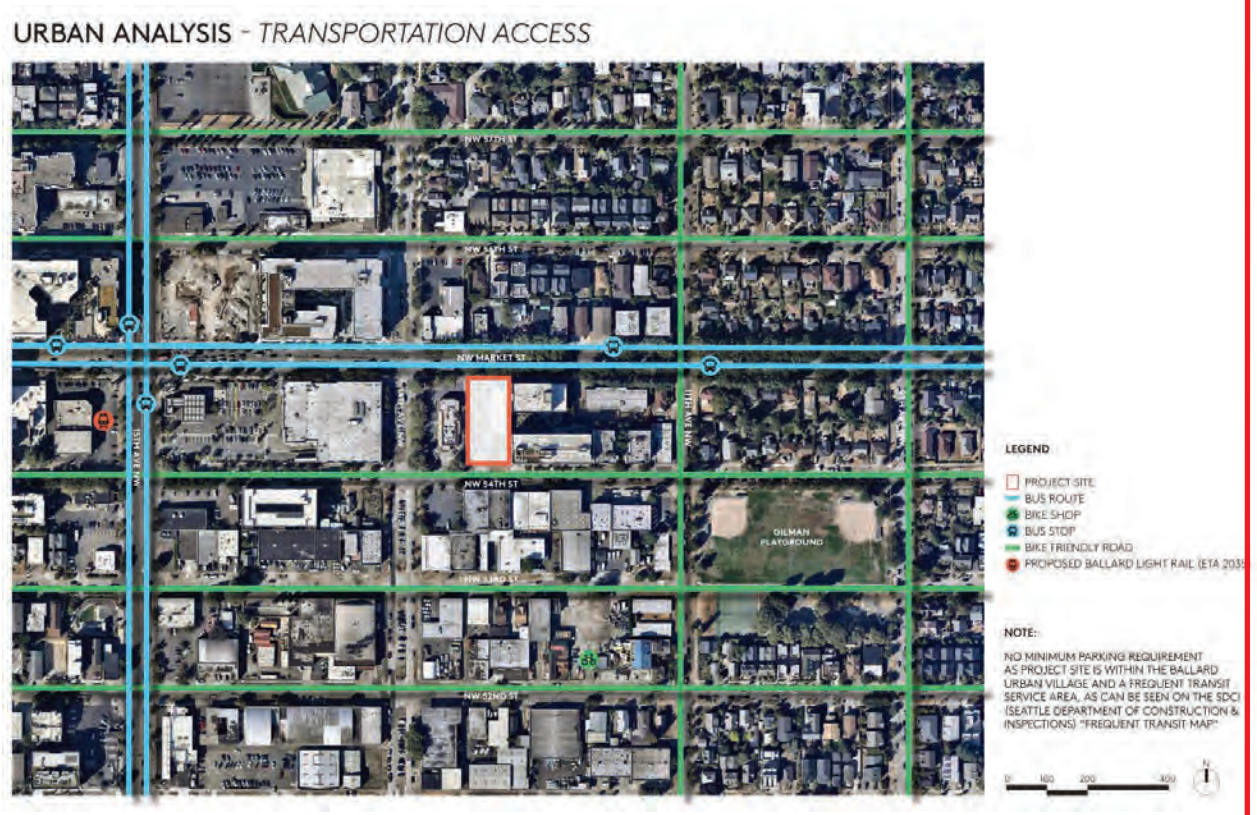
Specifically, our comments on the One Seattle Comprehensive Plan and DEIS are:

- **Support for Ballard Regional Center**. I support the Ballard Regional Center designation, including our two properties. Establishing Ballard as a Regional Center will recognize its regional importance as a housing and jobs center, along with its unique cultural, retail, and entertainment assets and the future Sound Transit light rail connectivity. **I agree that designation as a Regional Center should result in high-rise heights and densities, especially around the future light rail station and along key frequent transit corridors**.

- **1145 NW Market Street**. Located one block east of the anticipated Ballard light rail station, our 1145 NW Market Street property is one of the most compelling transit-oriented

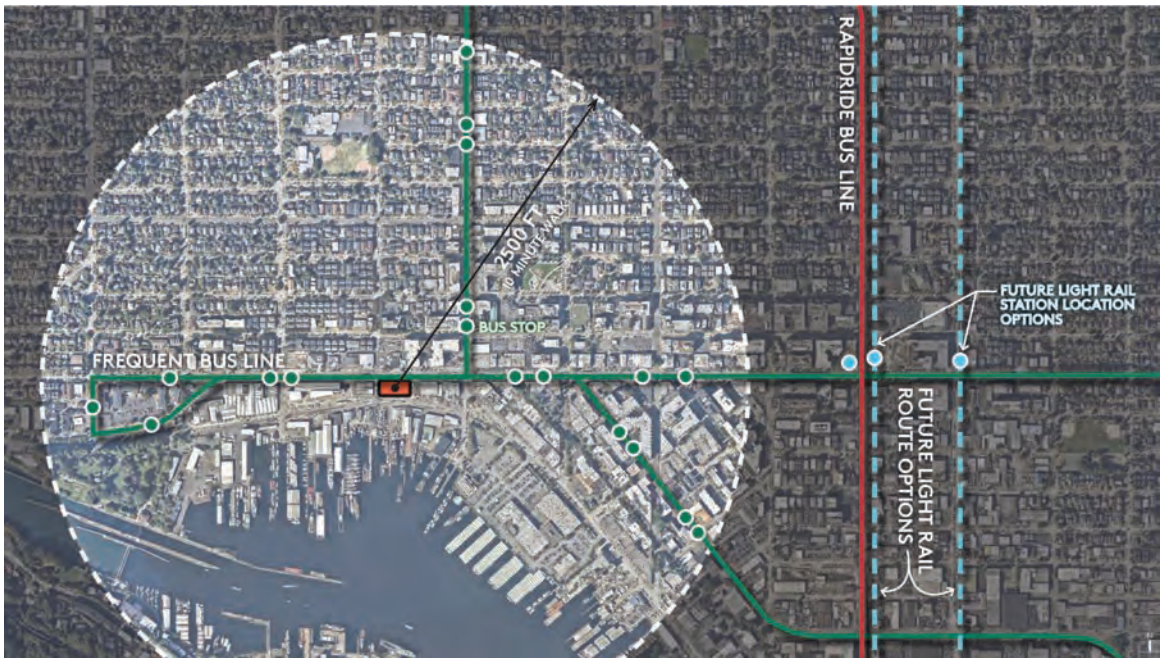
development opportunities on Market Street (see below). **The One Seattle Plan and Final EIS should study the potential for heights and densities of up to 240 feet around the walkshed of the future Ballard light rail station, including 1145 NW Market**. The City should ensure there is sufficient transit-oriented zoning around light rail to truly leverage the massive regional investment in transit infrastructure. While the property is currently entitled for a mid-rise housing project, I believe the best future of the 1145 NW Market property is as a catalyst for the new Ballard Regional Center with the development of high-rise residential.

75-1 cont



- **15th & Market.** The current 15th & Market Building is also within the heart of the transit-oriented development area adjacent to the future light rail station. This should be the densest area in the Ballard Regional Center. Like the U-District TOD zoning, I encourage the City to study and adopt zoning at the 15th & Market intersection supporting densities of 320+ feet.

- **2501 NW Market Street**. Located just east of 24th Street and near the Nordic Museum, our 2501 NW Market street property is a transformational site on the western edge of the pedestrian Market Street corridor. This part of Ballard is well served by transit (see below) and is part of an emerging cultural and residential hub around the museum. In recognition of the characteristics that distinguish this part of Ballard from the "heart" of Market Street, I encourage the **One Seattle Plan and Final EIS study the potential for heights and densities of up to 160 feet west of 24th Avenue along Market near the Nordic Museum**.



75-1 cont

- **Growth Assumptions**. The DEIS contemplates a target of over 6,000 net new housing units and over 4,000 net new jobs in the Ballard Regional Center. With transit-oriented zoning, I anticipate the three properties above potentially support over 750 new housing units alone. **The One Seattle FEIS should study increased housing and jobs targets for the Ballard Regional Center so that the City can fully analysis the benefits of TOD zoning**.

- **Ballard Subarea Planning**. I understand that the City is planning to do Ballard subarea planning to implement the zoning as a Regional Center, however, that this work is not scheduled to start until 2027. **I encourage the City to expedite all subarea planning, and make this new Ballard Regional Center one of the first subarea plans to be completed**. Without clarity as to the specifics of the Ballard Regional Center zoning, property owners, potential development partners, and the public will not be able to plan for investment in the future of Ballard. That uncertainty will delay the opportunities to create more Ballard housing.

Again, I appreciate the opportunity to comment on the One Seattle Plan. I believe that the Ballard Regional Center, with transit-oriented development zoning, will not only enhance the vitality of Ballard but also contribute to the overall livability and sustainability of the City and our region. I am committed to working with the City to support the successful implementation of the Regional Center.

As always, thank you for your consideration. Please feel free to contact me with any questions.

Sincerely,

Jordan Selig

cc: Councilmember Strauss

May 23, 2024

Office of Planning and Community Development
Seattle City Hall
600 4th Avenue, 5th Floor
Seattle, WA 98104
Attn: Jim Holmes; Rico Quirindongo
Email: PCD_CompPlan_EIS@seattle.gov

Re: Industrial zoning on the Fremont Cut

Dear Mr. Quirindongo,

Thank you for the opportunity to comment on the One Seattle Comprehensive Draft Plan ("Draft Plan"). Snow & Company, Inc. occupies the property located at 469 NW Bowdoin Pl (parcel no. 7442000705), shown below. We operate a boat repair business on this property, servicing vessels that dock along the waterfront here.

We appreciate the Draft Plan's strong support of industrial uses in the industrial zone. Upon review of the Industrial Zone policies, we wanted to provide some thoughts regarding the draft policies and the forthcoming Shoreline Management Program updates to begin this year. Our property is currently in an Industrial Land Use Classification and zoned MML U/65 after a years-long process to update the City's industrial zones.

76-1

However, it has been our recent experience that the City's shoreline policies can conflict with the intended function of both the underlying zoning and shoreline environment, resulting in the creation of nonconforming uses and precluding new industrial uses from locating in the zoning and shoreline environments designated to accommodate them. Many of the businesses along the Fremont Cut rely

upon the use of the waterway to function; yet, the City's current SMP precludes moorage in most areas of the Cut.

Accordingly, we recommend expanding one Industrial Zone policy to ensure viability of those businesses which rely on the shoreline. We ask the City to consider revising LU 13.2 as follows:

> Preserve industrial land for industrial uses, especially where industrial land is near rail- or water-transportation facilities to allow marine- and rail-related industries that rely on that transportation infrastructure to continue to function in the city. Ensure that marine-related industries have flexibility to utilize the shoreline as necessary to support business functions.

We recognize that there will be further discussion of changes to the management of shoreline areas in the upcoming Shoreline Code, but we nonetheless urge City to consider adopting this revision now as part of the Draft Plan to make it clear that the city's traditional shoreline industrial uses are supported.

76-1 cont

Thank you for your consideration. Please do not hesitate to contact us if there is any additional information we can provide on this issue.

Sincerely,

Brett Snow, President
Snow & Company

CIM

May 3, 2024

VIA EMAIL

Office of Planning and Community Development
Seattle City Hall
600 4th Avenue, 5th Floor
Seattle, WA 98104
Attn: Rico Quirindongo
Email: OneSeattleCompPlan@seattle.gov

RE: One Seattle Plan Comments
Proposed Downtown Sign Overlay

Dear Mr. Quirindongo,

As the owner of One Convention Place and the Pine Street Garage, CIM Group is invested in the success of both the One Seattle Plan and the Mayor's Downtown activation plan efforts. Thank you for the opportunity to comment on the One Seattle Comprehensive Plan Draft Environmental Impacts Statement ("DEIS"). In support of our investment in Seattle's success, we offer the following comments regarding the DEIS.

As our city continues to bounce back from the effects of COVID-19, optimizing Downtown as a hub for jobs and economic activity, including leveraging tourism assets is critical. We urge the City to pursue innovative land use strategies approaches to foster a welcoming environment for employers, visitors, and residents, including the implementation of a Downtown sign overlay.

Seattle has already embraced the concept of supporting community businesses and organizations through the use of a sign overlay district at Seattle Center. In our view, the Seattle Center Sign Overlay District ("Seattle Center Overlay") has a proven track record of supporting a broad array of stakeholders. We encourage the City to build on that model as part of the Downtown vision in the One Seattle Plan. We believe that such a sign overlay district is particularly well suited for the area around the Seattle Convention Center. It is easy to envision a possible Convention Center Sign Overlay District serving visitors and locals find their way up and down the Pike/Pine Corridor. 77-1

In order to lay the groundwork for a potential Downtown sign overlay district program, we respectfully suggest minor changes to the proposed Policy LU 4.11.

We support the currently proposed Policy LU 4.11 language, but offer that following edits.

> LU 4.11 - Regulate signage to encourage reasonable identification of business and to communicate information of community interest while limiting visual clutter, protecting the public interest, and enhancing the city's appearance and safety. In the Downtown, encourage the use of sign overlay districts around the Convention Center and Pike-Pine corridor to support Downtown economic development, promote Downtown vibrancy, improve the Convention Center experience for visitors, and contribute to the unique character of the Pike-Pine corridor.

We believe Downtown sign overlay would help implement Mayor's Downtown Activation Plan goals, including:

- **Make Downtown safe and welcoming** through improved streetscape experiences.
- **Create a unique Downtown retail experience** by enhancing retail visibility and activity.
- **Celebrate Downtown Seattle's arts, culture, sports, and entertainment** by partnering with local artists to offer free or reduced cost space for art installations and murals and informational signage advertising local cultural events and entertainment.
- **Make Downtown a top destination for Seattleites and visitors year-round** by increasing the signage and wayfinding around the Convention Center and the Pike-Pine corridor.

77-1 cont

As part of the One Seattle Plan EIS, we encourage the City to study the potential impacts of such an overlay district – following the Seattle Center Overlay – to streamline the potential implementation.

As always, thank you for your consideration. We would be happy to meet with City staff to discuss in more detail how a potential Downtown sign overlay could align with the One Seattle Plan vision.

Sincerely,

Sofia Tobar

Sofia Tobar
Vice President, On-site Property Management
CIM Group

cc: Markham McIntrye, Office of Economic Development

balboa

Letter 78

May 1, 2024

VIA EMAIL

Office of Planning and Community Development
Seattle City Hall
600 4th Avenue, 5th Floor
Seattle, WA 98104
Attn: Jim Holmes; Rico Quirindongo
Email: PCD_CompPlan_EIS@seattle.gov

Re: Support for Alternative 5 and increased development capacity at 830 NE Northgate Way

Dear Mr. Quirindongo,

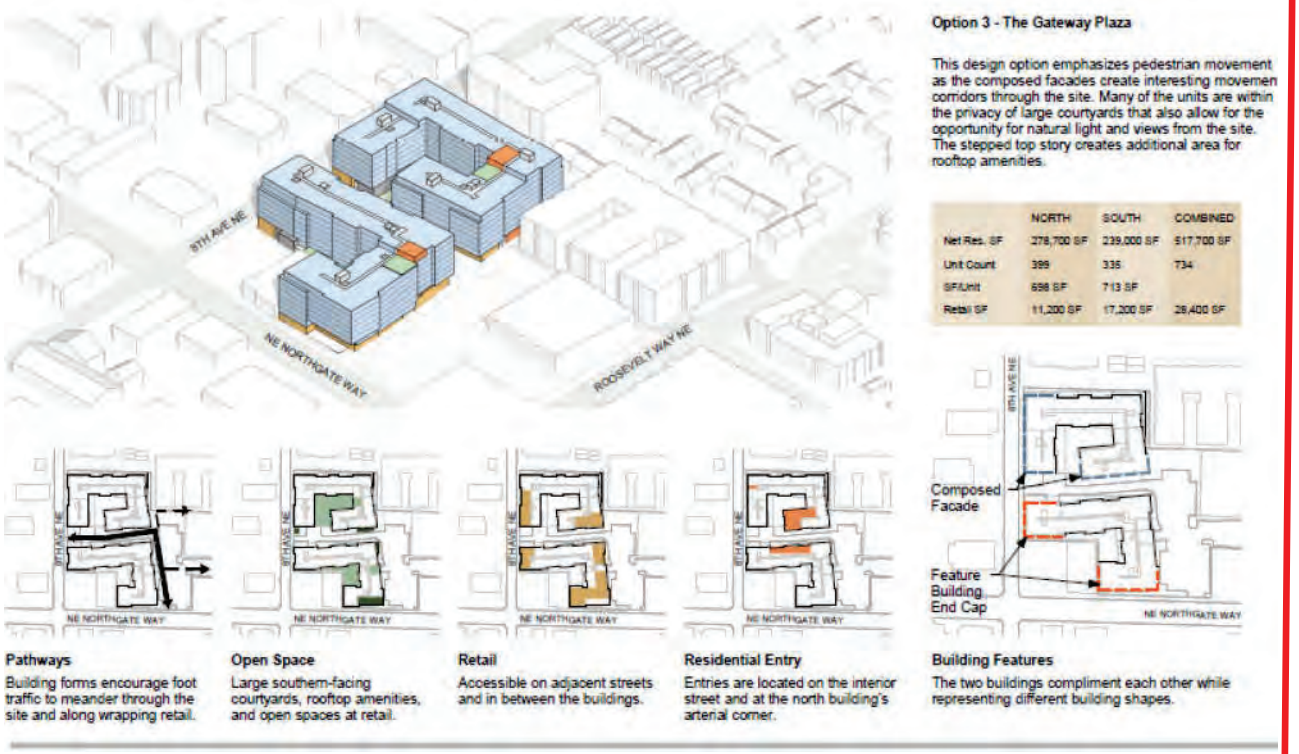
Thank you for the opportunity to comment on the One Seattle Comprehensive Plan Draft Environmental Impact Statement ("DEIS"). On behalf of Balboa Retail Partners and BRFII Northgate, LLC ("Balboa Retail"), owner of the property located at 830 NE Northgate Way ("Property"), we write to express support for Alternative 5, but request the Final EIS and Northgate Urban Center Subarea Plan study at least 85 feet in height on the Property. An 85-foot height limit would allow for dense multifamily development, accounting for possible soil conditions, as well as other desired urban amenities such as structured parking and pedestrian-oriented improvements that align with the City's vision for Regional Centers.

We believe 85-foot height this close to light-rail and on an arterial is wholly consistent with the Regional Center concept articulated in the Draft EIS. The Comprehensive Plan and Northgate Subarea Plan should prioritize high-density housing development on sites like the Property that will require significant investment to redevelop. 78-1

The Property is 213,065 square feet in size and is currently improved with one- to two-story retail buildings constructed between 1969 and 1970, and surface parking. Currently, the Property is zoned Neighborhood Commercial 3 with a height limit of 55 feet ("NC3-55(M)"). The Property is bordered by other larger scale multifamily and commercial properties.

With an abundance of retail in the area, the site would best serve the City's current goals if redeveloped to increase housing supply near transit. It is within a mile of the Northgate light rail and four bus routes serve the Metro transit stop located at the southeast corner of the Property.

Given the City's dire need to address housing affordability, the City should optimize larger sites like the Property and remove unnecessary height constraints. Notably, several properties in the vicinity have recently sought site-specific rezones beyond the current 55-foot height limit. With an increased height limit at 85 feet, initial massing studies for this Property show the ability to construct 734 new homes on the west side of the Property. Including the potential to develop the east side of the property, 300 additional new homes could be constructed with an increased 85-foot height limit.



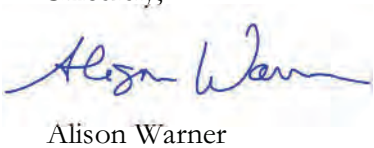
78-1 cont.

The existing Comprehensive Plan and zoning seek in part to transform larger, auto-centric blocks in Northgate into a dense, pedestrian-friendly environment. But redevelopment of larger retail sites often entails multiple complex leasing considerations, and requires significant investments over a longer period of time. If height continues to be limited to 55 feet, if significant pedestrian improvements are required, and MHA fees in this area remain at current levels, it will continue to be difficult for the transformation of larger sites in Northgate to materialize. The Comprehensive Plan Update should recognize these challenges and seek opportunities for greater height in the Northgate Regional Center, allow for flexible retail requirements, and recalibrate MHA fees to align with current land values.

We believe the Property presents an ideal opportunity for housing production near light rail, along with the City's desired street improvements and pedestrian-oriented amenities. We share the City's vision for Northgate that seeks to break down the larger-scale, driving-centric blocks that currently predominate this area. For this vision to materialize, we request the FEIS and Northgate Subarea study at least 85 feet in this location.

Please do not hesitate to contact me at alison@balboaretail.com if we can provide any additional information.

Sincerely,



Alison Warner
Balboa Retail Partners

78-1
cont

Cc: Joseph Fahey, BRFII Northgate, LLC
Jack McCullough, McCullough Hill PLLC
Jessica Roe, McCullough Hill PLLC

May 20, 2024

VIA Email
PCD_CompPlan_EIS@seattle.gov

RE: One Seattle Comprehensive Plan DEIS Comment
Support Expansion of Neighborhood Centers to Include Sand Point/Princeton

Dear Mr. Holmes:

SBPS LLC owns a 126,000 SF assemblage at the intersection of Sand Point and Princeton, fronting Sand Point Way NE between 47th Ave NE and 50th Ave NE (the "Property").[1] The City did not include Sandpoint/Princeton as a Neighborhood Center in the City's draft plan even though the Property's Neighborhood Center designation would advance all of the City's stated Comprehensive Plan objectives.[2] If designated as a Neighborhood Center, the underutilized Property would provide the City with much needed housing and neighborhood-serving retail *without displacing a single residence*. **We strongly encourage the City to include Neighborhood Centers as a preferred alternative in the final environmental impact statement and include Sandpoint/Princeton as Neighborhood Center in the City's final EIS and final plan.**

The City has received feedback that its draft Comprehensive Plan must do more to significantly increase our current housing crisis or risk exacerbating Seattle's housing crisis. Recently, the Complete Communities Coalition, a coalition of over 50 diverse organizations, asked the City to expand Neighborhood Centers and to include all of the Neighborhood Centers studied in the DEIS, including Sandpoint/Princeton. SPBS strongly supports this sentiment.

Specifically, we ask the City to add the Sandpoint/Princeton as a Neighborhood Center as it moves to the final environmental impact statement. We provide the City with the following information to inform its analysis: 79-1

Displacement Risk is Low

The Displacement Risk at Sand Point/Princeton is low as identified in the DEIS Displacement Index at Exhibit 3.8-31 (showing the intersection and all immediate areas as deep blue demonstrating the lowest displacement risk in the City.)

[1] Tax Parcel Nos. 601250-0080, 601250-0051, and 102504-9210.
[2] The City's objectives are identified in DEIS Section 2.1.3: equity, livability, affordability, inclusivity, climate resiliency, and consistency with other plans and policies.

More Housing
The area is under-zoned at NC2P-40. The Neighborhood Center designation would increase the Property's height by 30-feet. Increased development potential makes the property financially feasible to redevelop, and increasing the height could result in 100+ more housing units than otherwise allowed under current zoning.

More Affordable Housing
The increased housing potential will result in additional affordable housing through MHA and MFTE.

Excellent Transit
The City has designated the Sand Point Way NE corridor as "frequent transit service." The City's DEIS largely struck corridor planning in favor of Neighborhood Centers. The City could encourage both if it designated Sand Point/Princeton as a Neighborhood Center. The Property could serve as a Neighborhood Center hub for frequent-transit corridor growth along Sand Point Way.

This is also an opportunity for the City to expand housing along stated transit corridors in Seattle's neighborhoods. The State Legislature has continued to explore this as a statewide commitment to incentivize housing near transit and Seattle should mirror this approach across the City.

79-1 cont

Non-Motorized Connections
Encouraging growth at Sand Point/Princeton advances the City's Carbon reduction goals. There are few places in the City with better multi-modal transportation options.

A crosswalk connects the Property to the Burke-Gilman trail for easy bike access and no-carbon commutes throughout the City. Housing should continue to be prioritized near non-motorized routes to promote weekday commute and leisure trips.

Neighborhood Center Locational Criteria
The area matches the DEIS's definition of a Neighborhood Center: "places with a wide range of housing and businesses that primarily serve the local community. These areas resemble urban villages, but with a smaller size and lower intensity of allowed development."[3]

Livability
The area is in the immediate vicinity of Pathways Park and walking distance to Magnuson Park.

Planning and Economic Realities Are Aligned
Many of the areas identified as Neighborhood Centers will not develop in the next decade due to real estate encumbrances or leases. In contrast, the Property does not have these

[3] DEIS, p. 2-3.

limitations and SPBS is interesting in beginning the entitlement / redevelopment process once the Property is designated as a Neighborhood Center with additional redevelopment potential. These economic factors should be considered when forecasting future housing units and evaluating various Neighborhood Centers.

Sincerely,

SPBS LLC

Geoff Wood
gwood@windermere.com

79-1 cont

cc:
Jim Holmes, jim.holmes@seattle.gov

Letter 80

May 13, 2024

VIA EMAIL

Office of Planning and Community Development
Seattle City Hall
600 4th Avenue, 5th Floor
Seattle, WA 98104
Attn: Rico Quirindongo
Email: PCD_CompPlan_EIS@seattle.gov

Re: One Seattle Plan
Support for Ballard Regional Center

Dear Mr. Quirindongo,

On behalf of Lock Vista Apartments LLC ("Lock Vista"), we write to provide our comments on the Draft Environmental Impact Statement ("DEIS") for the One Seattle Comprehensive Plan.

Lock Vista is the owner of the apartments at 3025 NW Market St. in the western edge of the future Ballard Regional Center. We support the mayor's vision for One Seattle and policies that will facilitate greater residential density and commercial vitality in Ballard, which will provide a better urban environment for our residents while contributing to the sustainability of Seattle as a whole.

Accordingly, we support the proposed Ballard Regional Center designation and urge the city to complete the applicable subarea plan as quickly as possible. This will facilitate comprehensive and cohesive planning that will identify and support Ballard's unique residential, retail, and transportation needs, helping to create a more livable and inclusive community for residents and visitors alike, which will be further enhanced once the Sound Transit Ballard station is completed as part of Sound Transit's ST3 Ballard Link Extension (BLE).

In addition, we request that the Final Environmental Impact Statement study the impacts of allowing greater residential density, with buildings up to 125 feet in height, along the westernmost sections of Market Street, including the use of mass timber construction. This could potentially contribute to more sustainable transit-oriented mixed-use housing along the westernmost Market Street corridor, which will be supported by ST3's BLE Ballard station. 80-1

We are committed to supporting the city in its efforts to plan for the future growth and development of Ballard as a Regional Center, and we would be happy to provide further information upon request.

Sincerely,

s/Amy Worthington
Lock Vista Apartments LLC

cc: Councilmember Strauss

Letter 81

May 13, 2024

VIA ELECTRONIC MAIL

Office of Planning and Community Development
Seattle City Hall
600 4th Avenue, 5th Floor
Seattle, WA 98104
Attn: Jim Holmes; Rico Quirindongo
Email: PCD_CompPlan_EIS@seattle.gov

Re: One Seattle Comprehensive Plan Draft Environmental Impact Statement

Dear Mr. Quirindongo,

Thank you for the opportunity to comment on the One Seattle Comprehensive Plan Draft Environmental Impact Statement ("DEIS").

Urban Visions owns the site commonly known as the S development property, located at 1045 6th Avenue S. and 1022 6th Avenue S. (the "Property"). In 2011, the Property, together with other nearby sites, was rezoned under the Livable South Downtown planning initiative. The environmental impact statement prepared for Livable South Downtown contemplated transitioning the Property and the nearby area into the Downtown Urban Center. However, late in the process, a decision was made to allow this area to remain in the Greater Duwamish Manufacturing Industrial Center (the "MIC"), but subject to a newly-created zone.

81-1

The IC-85/160 zone that was created for this area in 2011 is hardly an industrial zone. It is, in effect, a proxy for a Downtown zone, in that it incorporated a host of characteristics common to Downtown zones – but foreign to industrial zones – including:

- Required use of Housing Bonus and TDR provisions to achieve maximum density.
- Exception from maximum-size-of-use limits for office development
- Allowable height far in excess of typical industrial height limits and consistent with Downtown height limits
- Requirements for sidewalk widening, pedestrian through-block connections, overhead

weather protection, landscaping, and other streetscape improvements, and onsite open space, all typical of Downtown development and inconsistent with normal industrial zoning standards.

In 2023, the City revised the zoning for the Property and its vicinity to II 85-240. This new zone allows a 50% increase in density for office uses in the area, while still requiring the Downtown development standards noted above.

In truth, the II 85-240 zone is more akin to a Downtown zone than to any other industrial zone. Further, the area in which this unique zone is located is physically separated from the remainder of the MIC: it is bounded by the Stadiums on the west, the Metro bus bases on the south and the CID and residential neighborhoods on the north and east. Currently, there are permits for more than 1 million square feet of office space on the Property – and more is possible – all designed to be compatible with the adjoining Downtown zones.

In addition, Sound Transit is in the process of approval of the WSBLE line, which is likely to lead to the development of a new light rail station adjoining this area on Seattle Boulevard. And regardless of whether this "CID South" station is developed, this entire area is within a close walkshed of the existing Union Station light rail station. The area is well-suited for a mix of transit-oriented urban uses at high density.

81-1 cont

Unfortunately, current market conditions indicate that office development may not be feasible in the area in the immediate future. Our city and region, however, continue to need robust housing development, especially in locations near regional transit facilities. This area is therefore ideal for future mixed-use and residential development. The current industrial designation of the area is, frankly, an historical accident. The area is already effectively a part of the Downtown and it has no connection to the industrial activities in the MIC.

For these reasons, the City should take action in the current Comprehensive Plan update process to remove this area from the MIC and incorporate it in the Downtown Urban Center, where it belongs. The opportunity for residential and mixed-use development will support the CID to the north and will align with the City's vision for Regional Centers.

Sincerely,

CEO, Urban Visions

May 14, 2024

VIA ELECTRONIC MAIL

Office of Planning and Community Development
Seattle City Hall
600 4th Avenue, 5th Floor
Seattle, WA 98104
Attn: Jim Holmes; Rico Quirindongo
Email: PCD_CompPlan_EIS@seattle.gov

Re: One Seattle Comprehensive Plan Draft Environmental Impact Statement

Dear Mr. Quirindongo,

Thank you for the opportunity to comment on the One Seattle Comprehensive Plan Draft Environmental Impact Statement ("DEIS").

Urban Visions is the development manager of the properties located at 318 5th Avenue N. (Parcel 1991200390) and 516 Broad Street (Parcel 1991200375) (the "Property"). Urban Visions has contemplated the potential for office and R&D development for the Property. However, given the current state of the financial markets and the lack of office demand in the Seattle market, it makes sense to consider possible future residential development for the Property.

Unfortunately, the current zoning provisions for residential development in the Uptown neighborhood impose obstacles to such development. The conditions associated with the 160-foot height limit for tower development do not support the kind of residential development that could be achieved in this center-city neighborhood. 82-1

We write to express support for Alternative 5 in the DEIS, but request the Final EIS and Uptown Urban Center Subarea Plan study modifications to the 160-height concept that would better promote residential development under current conditions. Specifically, the City should consider the following:

- Increase of tower height to 200 feet.
- Increase of podium height to 85 feet.
- Increase of tower floorplate gross floor area to 75% of site area.
- Provide additional FAR.

These and other measures will meaningfully increase the likelihood of new residential development in this portion of the Uptown neighborhood. Such zoning revisions in Uptown would align with the City's vision for Regional Centers.

82-1 cont

Sincerely,

CEO, Urban Visions

Letter 83

From: Nivi Achanta
To: PCD_CompPlan_EIS
Cc: Rivera, Maritza
Subject: Seattle comp plan environmental impact q"s
Date: Monday, May 6, 2024 4:40:05 PM

CAUTION: External Email

Hi! I've been reading over the comp plan and have some questions about the environmental impact. I think this plan should include housing AND trees (and climate resilience in general) and it seems to do neither. Some questions:

1. What's the comp plan's impact on Seattle's plants & animals? I'm looking at Section P 3-3 which states “none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild.” 83-1
2. I'm concerned about lost urban forest. The PNW is a critical urban forest we must protect if we are to build any sort of climate resilience -- what analysis shows that tree planting programs, coupled with increased hardscape, will compensate for lost urban forest? 83-2
3. How will Seattle make progress towards its 30% canopy goal? How much public land is available to reach this goal?

I am also extremely concerned about the lack of housing and request that there is more attention on funding social spaces, but I left those comments on the plan itself.

Nivi Achanta

Soapbox Project
www.soapboxproject.org
Join us in fighting climate change from your inbox in 3 min every week.

Let's Connect!

Letter 84

From: Judy Akalaitis
To: PCD_CompPlan_EIS
Cc: Rivera, Maritza
Subject: Environmental Impact Question
Date: Sunday, May 5, 2024 9:39:18 PM

CAUTION: External Email

Hello,

It is my understanding that Seattle is short of the 30% canopy cover that it aspires to have and is currently losing about 50 canopy acres per year.

84-1

Please tell me where exactly Seattle has planned for the planting and maintenance* (and watering the first 5 years?) of approximately 100,000 new trees? Is there a map and a plan?

Kind Regards,

Judy

Judy Akalaitis
206.370.4176

Letter 85

From: Judy Akalaitis
To: PCD_CompPlan_EIS
Cc: Rivera, Maritza
Subject: EIS Question
Date: Sunday, May 5, 2024 9:48:34 PM

CAUTION: External Email

Hello,

I am writing to ask about the statement that the comprehensive plan will work toward a 30% canopy goal. However, huge, native mature trees are being removed daily because of the impacts of the new tree ordinance – even though it is possible, in many cases, to plan a project with these trees. 85-1

My question is: how will Seattle plant enough trees to make up for development? How is this measured? Who and how will this be monitored?

Kind Regards,
Judy Akalaitis
3116 NE 84th St.

Judy Akalaitis
206.370.4176

Letter 86

From: FranFriend KirkAlex
To: PCD_CompPlan_EIS
Subject: Comprehensive Plan does not even mention our Covenants
Date: Monday, April 15, 2024 2:05:09 PM

CAUTION: External Email

In 2002, my husband and I bought a house in the Sea-Lawn Acres Add of Broadview. We had spent the 4 years prior looking at houses, from Federal Way to Everett, with a Covenant protecting the house's views from impediment. Most houses with view Covenants included language that restricted ownership based on racial, ethnicity, or religious beliefs. We found a house we wanted in Innis Arden, but, that community had just voted to keep that discriminatory language in their Covenants. We wanted no part of a community that actively discriminates. 86-1

We chose Sea-Lawn Acres Division 1 in Broadview because of its broad view and because there was no discriminatory language in our Covenant and never had been. Our Covenant, which goes with the land, protects our views from trees, shrubs, houses and expressly prohibits anything other than a one-story, single-family home within 1 structure per lot.

Please allow our Covenant to speak for us:

"All lots in said plat shall be known and described as "Residential" lots. No building or structure shall be erected, altered, placed or permitted to remain on any lot in said plat other than one single family dwelling not to exceed one story in height, together with out building appurtenant thereto and a private garage for not more than 3 cars." The ground floor area of the main structure on any lot included in said plat, exclusive of open porches and garages, shall not be less than 1000 square feet on a 60 foot lot nor less than 1200 square feet on a 70 foot lot or larger..."

"No trailer, basement, tent, shack, garage, or other outbuilding shall at any time be used as a residence either temporarily or permanently, nor shall any structure of a temporary character be used as a residence."

"No owner of any lot in said plat shall erect, plant or maintain or permit to remain on his lot, or the street abutting thereon, any radio antenna, shrubs, hedges, trees, or other planting which shall, in any manner, obstruct or impair the view of Puget Sound from any other dwelling.

"No noxious or undesirable thing, trade or business or noxious or undersirable use of the property in said addition whatsoever, shall be permitted or maintained upon said property, or in said Addition.

"All of the fore going conditions, limitations, restrictions and covenants shall be deemed covenants and restrictions running with the land, and shall be binding on any and all persons who may at any time or from time to time own, or have any interest whatsoever, in any lot in said plat, their heirs, personal representatives, successors and assigns, whether such ownership or interest be acquired by deed, contract, lease, tenancy, process of law or otherwise, until January 1,1956, at which time said covenants and restrictions shall be automatically extended for successive periods of 10 years each, unless, on or before said above mentioned date, or any 10 year extension, a written instrument shall be executed by the then record owners of a majority of the lots in said plat and duly recorded in the office of the County Auditor of King County, Washington, terminating or otherwise changing or modifying said covenants, or restrictions, in whole or in part, to take effect on said above mentioned date or at the expiration of any of said successive 10 year periods thereafter. The owner of any lot in said plat shall have the right and power to enforce any or all of the conditions, limitations, restrictions and covenants contained herein against any person or persons violating or

attempting to violate the same, either by injunction to prevent him or them from so doing or by the recovery of all damages suffered as the result of any breach thereof.

"Invalidation of any of the covenants or restrictions contained herein by judgement of any court shall in no wise affect any of the remaining provisions hereof, which shall remain in full force and effect."

86-1 cont

For whatever reason, the City of Seattle has neither recognized nor acknowledged our Covenants in their Comprehensive Plan. Our Covenant says you cannot build a structure in front of us that impedes our view of Puget Sound. The Washington State Supreme Court affirmed the Court of Appeals published opinion in the case of Save Sea Lawn Acres vs. Mercer et al, and reinforced the fact that the Sea Lawn Acres Division 1 Covenant is "in full force and effect and fully enforceable".

I laughed when I read House Bill 1110 mandating that certain homes would get a Covenant for 50 years requiring that the price be kept affordable. By neither recognizing nor exempting the Sea Lawn Acres Covenant, the City of Seattle is running over our Covenant like a freight train, sacrificing our collective views, quality of life, and our financial futures for the financial gain of the developer/owner. Please tell me how a 50 Year Rent Control Covenant will be enacted and enforced at the same time you ignore ours as if it does not exist.

Broadview will no longer be Broadview if the City and State permit this Comprehensive Plan to be permitted here, brushing aside our Covenant, and forcing us to spend the $60,000.00+ it will cost us to litigate a view blocker in Court (that is with inflation on what the last view protection lawsuit cost us). Broadview will become NOview or Peek-a-View.

No where did I read where the state or the city is willing to compensate us for the loss of our view. My next-door neighbor's executor told me he is putting that house on the market for $2,500,000. Why? The view and the Covenants. Otherwise, the house is worth $1,000,000 less, who will compensate us for our losses?

The state and city want to take our views away from us so they can overpopulate the neighborhood with massive numbers of people, cars, and pets. That is not sustainable. Broadview spent decades with flooding and pervasive sewer issues. After 25 years of problems, we finally got relief last year with new drainage pipes but that infrastructure will not accommodate 3 new houses on every lot. The city is rectifying the lagging infrastructure just in time to repeat the entire upgrade process times 4. Great planning.

Broadview west of 2rd Ave NW is all residential now, no sidewalks, no bus service except 3 peak weekday morning & evening times, no commercial services.

- 8th Ave NW is the 2nd busiest street in Broadview with pedestrians, cars, bikes, trucks, you name the form of transportation, but it has no sidewalks.
- 8th Ave. NW in Broadview is 0.9+ miles from the nearest constant service bus stop on Greenwood, and it is all straight up hill. This is not a neighborhood for a disabled person to get to a bus stop.
- We have no sidewalks, until you reach the Broadview Library at the top of the hill at Greenwood, you are walking or biking on a street with cars, bikes, and other people.
- We have narrow streets and alleys, some very curving, that the utility trucks just fit; there is no room in front or in back for street parking unless you take away any future we might have of finally getting a sidewalk off our currently very busy streets. And, the plan to have at least 4 times as many pedestrians, cars, bikes, and trucks on our narrow streets with no sidewalks

as there are now? How will anyone have enough air to breathe? How will our air pollution not increase and thereby increase respiratory issues and planetary destruction?

86-1 cont

Your Comprehensive Plan will cost thousands to millions in lawsuits in every community with a view Covenant. The City will have immunity because the State gave them immunity, but, homeowners within a Covenant will not have immunity from lawsuits. You will pit neighbor against neighbor and it will become a war of anger, exasperation, survival, financial ruin, and courts. Is that the future you want for Broadview?

No? Then recognize Sea Lawn Acres Covenant in your Comprehensive Plan and exclude us from your forced housing increase.

Thank you for your consideration,

Fran Friend Alexander
12717 8th Ave NW
Seattle, WA 98177
(206) 371-2748

Letter 87

From: Gia Alfieri
To: PCD_CompPlan_EIS
Cc: Moore, Cathy
Subject: Environmental impacts of Seattle"s plan
Date: Friday, May 3, 2024 9:13:05 AM

CAUTION: External Email

Hello. Thank you for the work you're doing.

87-1

I have three questions regarding the environmental impacts of Seattle's new proposed plan.

1. What is the impact of the plan on Seattle’s plants and animals?

2. Regarding adverse impacts on tree canopy cover, what study shows that planting new trees will compensate for lost old growth trees and urban forests?

87-2

3. Regarding the 30% canopy goal, how much public land is required to reach the goal and how many trees will need to be planted yearly on public land to compensate for trees lost to development?

Thank you for your time.

Gia Alfieri
3738 NE 130th St, Upper
Seattle WA 98125

DEIS StoryMap Comment

Name: Scott Alspach

Email: salspach@outlook.com

Date: 5/6/2024

Comment:

The city should study the impacts of additional Neighborhood Centers off of arterials, especially in the Green Lake neighborhood. Of the available alternatives, I strongly prefer Alternative 5 with higher growth targets.

88-1

DEIS StoryMap Comment

Name: Robin L Amadon

Email: Rlandy@comcast.net

Date: 5/5/2024

Comment:

My housing questions for the Comp Plan DEIS (due Monday 5 pm):
1) Where is the definition of affordability that's used in the DEIS? It's often said that you can't manage what you can't measure. Without a clear definition, the City has nothing to measure against.

2} If the Plan says it implements HB 1011, and the definition of affordability in HB 1011 is clearly stated at less than 60% of AMI for renters and less than 80% of AMI for owner-occupied, why isn't this statewide definition in the Plan?

3) In the DEIS Executive Summary, the objective for affordability is: "Increase the supply of housing to ease increasing housing prices cause by limited supply and create more opportunities for income-restricted housing." Where is the evidence that this dependence on supply-side, trickle-down housing works, or that it has worked to reduce housing costs to a level affordable to low-income people, during the past 5 to 10 years of the most extreme increases in supply of rental housing ever experienced in Seattle?

4) If you exclude fanciful supply-side housing promises, what is the likelihood that this plan will result in affordable low-income housing provided by the market?

5) Do you agree that given the state definition of affordability in HB 1110, that no new for-profit housing will be affordable without subsidies? Where does the DEIS acknowledge this?

6) Do you agree that given the state definition of affordability in HB 1110, no new market-rate townhouses are affordable to households with incomes less than 80% of AMI, without subsidies and income restrictions? Do you agree that townhouses are the predominant form of new housing being permitted in formerly single-family zones?

88-1

DEIS StoryMap Comment

Name: Robin L Amadon

Email: Rlandy@comcast.net

Date: 5/5/2024

Comment:

7) Although HB 1110 allows duplexes, triplexes, fourplexes, sixplexes, stacked flats and courtyard apartments, what is the likelihood that any of these Middle Housing forms will be built by current for-profit infill developers, when these builders refuse to build rentals of any sort? If these forms are meant to produce rental apartments in formerly single-family neighborhoods, and non-profits have told the city that they can't build there either, because they need economies of scale for construction and staffing, where are the programs or zoning incentives Urban Residential neighborhoods? 90-1

8) What is the environmental impact of continuing to lose 1.7% of our tree canopy every five years, when 70% of our tree canopy and most of the loss is in formerly single-family neighborhoods?

9) Where does the plan acknowledge that planting new trees takes 20-30 years to provide tree canopy, to shade houses, or to combat heat islands?

10) Where does the plan acknowledge that supply-side trickle-down housing takes 30-40 years to age into natural affordability, when a Stanford researcher who studies this determined that Seattle hadn't built enough housing 40 years ago for this to be a significant factor, when instead, Seattle tends to recycle older affordable rentals by rehabbing them into new, market-rate housing?

11) Specifically, how many low-income affordable rentals will be built under Alternative 5? Will this be half of all new housing units, as called for by the Governor and the Department of Commerce? If not, what zoning and policies could mitigate the extreme lack of affordable rentals in Seattle?

12) Several years ago, the City redefined "family-sized housing" as 2 bedrooms, rather than 3 bedrooms. How has that change contributed to the lack of family-sized rental housing being built, and what would be the effect of restoring the definition of family size to the common understanding of 3 bedrooms?

13) What zoning tools are available, including MHA, to require more family-sized 3-bedroom rental housing at all income levels?

14) Where does the housing plan acknowledge the needs of seniors and people with disabilities for accessible housing without stairs? How can the plan incentivize stacked flats and courtyard apartments? Wouldn't such forms mean one-third to half the apartments would be ground-floor accessible apartments? Could these apartments be built by non-profits with the benefit of land trusts funded by the City?

DEIS StoryMap Comment

Name: Robin L Amadon

Email: Rlandy@comcast.net

Date: 5/5/2024

Comment:

15) Shouldn't courtyard apartments be an option, especially where "protected" trees occupy the center of a parcel? How can they be incentivized?

16) Instead of insensitively promoting residential units with the first floor raised up, shouldn't the City be promoting Universal Design in all new construction, so that seniors and people with disabilities can find suitable homes in our future city?

17) Since we no longer have single-family neighborhoods, should every developer be required to build sidewalks on their property, not just in multi-family or Urvan Villages, as now?

18) What is the effect of lacking 11,000 blocks of sidewalks on our vision of a 15-minute city? On accessibility for seniors, people with mobility aids, baby strollers and ADA requirements? How can we include and fund a plan for a complete sidewalk grid within 20 years?

19) Where does the DEIS acknowledge that City policy about anti-eviction ordinances, and the continuation and/or extensions for the school year for families with children and slowness in the courts threatens all rental housing remaining solvent in City of Seattle? That without some changes, building affordable rental housing by the for-profit sector will be moribund.

91-1

Robin Landy Amadon

Letter 92

From: Robin Amadon
To: PCD_CompPlan_EIS
Subject: Comment on Comprehensive Plan EIS
Date: Sunday, May 5, 2024 4:06:35 AM

CAUTION: External Email

My housing questions for the Comp Plan DEIS

1) Where is the definition of affordability that's used in the DEIS? It's often said that you can't manage what you can't measure. Without a clear definition, the City has nothing to measure against. **92-1**

2} If the Plan says it implements HB 1011, and the definition of affordability in HB 1011 is clearly stated at less than 60% of AMI for renters and less than 80% of AMI for owner-occupied, why isn't this statewide definition in the Plan? **92-2**

3) In the DEIS Executive Summary, the objective for affordability is: "Increase the supply of housing to ease increasing housing prices cause by limited supply and create more opportunities for income-restricted housing." Where is the evidence that this dependence on supply-side, trickle-down housing works, or that it has worked to reduce housing costs to a level affordable to low-income people, during the past 5 to 10 years of the most extreme increases in supply of rental housing ever experienced in Seattle? **92-3**

4) If you exclude fanciful supply-side housing promises, what is the likelihood that this plan will result in affordable low-income housing provided by the market? **92-4**

5) Do you agree that given the state definition of affordability in HB 1110, that no new for-profit housing will be affordable without subsidies? Where does the DEIS acknowledge this? **92-5**

6) Do you agree that given the state definition of affordability in HB 1110, no new market-rate townhouses are affordable to households with incomes less than 80% of AMI, without subsidies and income restrictions? Do you agree that townhouses are the predominant form of new housing being permitted in formerly single-family zones? **92-6**

7) Although HB 1110 allows duplexes, triplexes, fourplexes, sixplexes, stacked flats and courtyard apartments, what is the likelihood that any of these Middle Housing forms will be built by current for-profit infill developers, when these builders refuse to build rentals of any sort? If these forms are meant to produce rental apartments in formerly single-family neighborhoods, and non-profits have told the city that they can't build there either, because they need economies of scale for construction and staffing, where are the programs or zoning incentives Urban Residential neighborhoods? **92-7**

8) What is the environmental impact of continuing to lose 1.7% of our tree canopy every five years, when 70% of our tree canopy and most of the loss is in formerly single-family neighborhoods **92-8**

9) Where does the plan acknowledge that planting new trees takes **92-9**

20-30 years to provide tree canopy, to shade houses, or to combat heat islands? **92-9**

10) Where does the plan acknowledge that supply-side trickle-down housing takes 30-40 years to age into natural affordability, when a Stanford researcher who studies this determined that Seattle hadn't built enough housing 40 years ago for this to be a significant factor, when instead, Seattle tends to recycle older affordable rentals by rehabbing them into new, market-rate housing? **92-10**

11) Specifically, how many low-income affordable rentals will be built under Alternative 5? Will this be half of all new housing units, as called for by the Governor and the Department of Commerce? If not, what zoning and policies could mitigate the extreme lack of affordable rentals in Seattle? **92-11**

12) Several years ago, the City redefined "family-sized housing" as 2 bedrooms, rather than 3 bedrooms. How has that change contributed to the lack of family-sized rental housing being built, and what would be the effect of restoring the definition of family size to the common understanding of 3 bedrooms? **92-12**

13) What zoning tools are available, including MHA, to require more family-sized 3-bedroom rental housing at all income levels? **92-13**

14) Where does the housing plan acknowledge the needs of seniors and people with disabilities for accessible housing without stairs? How can the plan incentivize stacked flats and courtyard apartments? Wouldn't such forms mean one-third to half the apartments would be ground-floor accessible apartments? Could these apartments be built by non-profits with the benefit of land trusts funded by the City? **92-14**

15) Shouldn't courtyard apartments be an option, especially where "protected" trees occupy the center of a parcel? How can they be incentivized? **92-15**

16) Instead of insensitively promoting residential units with the first floor raised up, shouldn't the City be promoting Universal Design in all new construction, so that seniors and people with disabilities can find suitable homes in our future city? **92-16**

17) Since we no longer have single-family neighborhoods, should every developer be required to build sidewalks on their property, not just in multi-family or Urvan Villages, as now? **92-17**

18) What is the effect of lacking 11,000 blocks of sidewalks on our vision of a 15-minute city? On accessibility for seniors, people with mobility aids, baby strollers and ADA requirements? How can we include and fund a plan for a complete sidewalk grid within 20 years? **92-18**

19) where does the Plan address the policy of anti-eviction ordinances, and their extensions for the school year that is harming the solvency of all rental housing in Seattle, and the chilling effect this has on for profit developers and non-profits for that matter to build rental housing in the City of Seattle? The supply you are adding is going to be expensive and it does not “trickle down” (see point 4 and 10.) There is a problem of safety and rent arrearage now in rental housing in large part due to eviction limitations that make building mixed-income housing by the for profit sector moribund; and in the **92-19**

non-profit sector it is an endeavor that requires massive subsidies that are scant of the need when the City faces budget shortfalls and a tax base post-pandemic that is falling short.
The DEIS is strangely absent any realities of implementation and incentives given the post-pandemic realities in our City. And City policies that run counter to serving the need.

Robin Landy Amadon

92-19 cont

From: Ken Anderson
To: PCD_CompPlan_EIS; LEG_CouncilMembers
Subject: Comment on DEIS
Date: Monday, May 6, 2024 10:22:00 AM

CAUTION: External Email

Please note my comment on the DEIS:

1: Section P 3-3 states that “none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild.” What is the impact of the plan specifically on Seattle’s plants and animals?

2: Section P 3-3 states that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." What analysis shows that tree planting programs, coupled with increased hardscape, will compensate for lost urban forest?

3: The plan states that Seattle will make progress toward its 30% canopy goal. The new tree ordinance substantially reduces private land available for trees. How much public land is available to reach the 30% goal? How many trees will need to be planted in these areas every year to make up for trees removed by development?

93-1

Sincerely,
Ken Anderson

--

Kenneth G. Anderson
Cell: 202-674-0404

DEIS StoryMap Comment

Name: Riley Avron

Email: ravron@posteo.net

Date: 3/26/2024

Comment:

Even alternative five is woefully too timid. The housing crisis is hurting our city every day, and all five alternatives fail to meet the moment. None redress historical redlining. None allow varied, high-density housing near our coasts and parks. None allow high density housing within generous walking distance of all our current and future transit investments. All seem primarily focused on ensuring change to our physical environment is slow, painstaking, and limited almost exclusively to our most dangerous, unhealthy roads, rather than boldly taking on our present crisis. None even pretend to meet our existing need, much less prepare us for housing abundance over the next two decades.

Please make all alternatives beyond 1 dramatically bolder, and then choose the boldest. We need real action, not more weak Seattle process.

94-1

From: Anita Barcklow
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 8:29:51 PM

CAUTION: External Email

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover" 95-1
* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Anita Barcklow
amdbarcklow@gmail.com
10738 Bartlett Ave. N.E.
Seattle, Washington 98125

DEIS StoryMap Comment

Name: Deb Barker

Email: djb124@earthlink.net

Date: 5/6/2024

Comment:

DEIS questions for the Comprehensive Plan Update:
1) Where is the definition of affordability that's used in the DEIS? It's often said that you can't manage what you can't measure. Without a clear definition, the City has nothing to measure against.
2) If the Comp Plan says it implements Housing Bill (HB) 1011, and the definition of affordability in HB 1011 is clearly stated at less than 60% of AMI for renters and less than 80% of AMI for owner-occupied, why isn't this statewide definition in the Plan?
3) In the DEIS Executive Summary, the objective for affordability is: "Increase the supply of housing to ease increasing housing prices cause by limited supply and create more opportunities for income-restricted housing." Where is the evidence that this dependence on supply-side, trickle-down housing works, or that it has worked to reduce housing costs to a level affordable to low-income people, during the past 5 to 10 years of the most extreme increases in supply of rental housing ever experienced in Seattle?
4) If you exclude fanciful supply-side housing promises, what is the likelihood that this plan will result in affordable low-income housing provided by the market?
5) Do you agree that given the state definition of affordability in HB 1110, that no new for-profit housing will be affordable without subsidies? Where does the DEIS acknowledge this?
6a) Do you agree that given the state definition of affordability in HB 1110, no new market-rate townhouses are affordable to households with incomes less than 80% of AMI, without subsidies and income restrictions?
6bå) Do you agree that townhouses are the predominant form of new housing being permitted in formerly single-family zones?
7) Although HB 1110 allows duplex, triplex, fourplex, sixplex, stacked flats and courtyard apartments, what is the likelihood that any of these Middle Housing forms will be built by current for-profit infill developers, when these builders refuse to build rentals of any sort? If these forms are meant to produce rental apartments in formerly single-family neighborhoods, and non-profits have told the city that they can't build there either, because they need economies of scale for construction and staffing, where are the programs or zoning incentives Urban Residential neighborhoods?
8) What is the environmental impact of continuing to lose 1.7% of our tree canopy every five years, when 70% of our tree canopy and most of the loss is in formerly single-family neighborhoods?
9) Where does the plan acknowledge that planting new trees takes 20-30 years to provide tree canopy, to shade houses, or to combat heat islands?
10) Where does the plan acknowledge that supply-side trickle-down housing takes 30-40 years to age into natural affordability, when a Stanford researcher who studies this determined that Seattle hadn't built enough housing 40 years ago for this to be a significant factor, when instead, Seattle tends to recycle older affordable rentals by rehabbing them into new, market-rate housing?
11) Specifically, how many low-income affordable rentals will be built under Alternative 5? Will this be half of all new housing units, as called for by the Governor and the Department of Commerce? If not, what zoning and policies could mitigate the extreme lack of affordable rentals in Seattle?
12) Several years ago, the City redefined "family-sized housing" as 2 bedrooms, rather than 3 bedrooms.

96-1

How has that change contributed to the lack of family-sized rental housing being built, and what would be the effect of restoring the definition of family size to the common understanding of 3 bedrooms?
13) What zoning tools are available, including MHA, to require more family-sized 3-bedroom rental housing at all income levels?
14) Where does the housing plan acknowledge the needs of seniors and people with disabilities for accessible housing without stairs? How can the plan incentivize stacked flats and courtyard apartments? Wouldn't such forms mean one-third to half the apartments would be ground-floor accessible apartments? Could these apartments be built by non-profits with the benefit of land trusts funded by the City?
15) Shouldn't courtyard apartments be an option, especially where "protected" trees occupy the center of a parcel? How can they be incentivized?
16) Instead of callously promoting residential units with the first floor raised up, shouldn't the City be promoting Universal Design in all new construction, so that seniors and people with disabilities can find suitable homes in our future city?
17) Since we no longer have single-family neighborhoods, should every developer be required to build sidewalks on their property, not just in multi-family or Urban Villages, as now?

96-1 cont

Letter 97

From: Karen Barrett
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 3:04:51 PM

CAUTION: External Email

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

RE: the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

* The draft EIS does not respond to the need to KEEP as many existing 6" DSH and larger trees AS POSSIBLE during development for public health, climate resiliency, environmental equity or sustainable urban forestry.

* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover" 97-1

* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services, nor maintenance to ensure survival.

Mitigation recommendations:

* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.

* Require Tree Inventories and Landscape Plans be done BEFORE tree removal and building permits are issued.

* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.

* Amendmend the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Karen Barrett
karenbarrettdesign@gmail.com
24th Ave E
Seattle, Washington 98122

Letter 98

From: Roniq Bartanen
To: PCD_CompPlan_EIS
Subject: Seattle"s Comprehensive Plan
Date: Monday, May 20, 2024 7:50:51 AM

CAUTION: External Email

To whom it may concern,

Seattle's Comprehensive Plan MUST include conservation of urban and non-urban species and stronger tree protections. We are in a continually warming cycle of our planet and climate crisis continues. How we move forward as a city with our future growth will impact us all. Please consider the negative impact of leaving behind policies and plans that will protect urban nature. Putting urban nature protection policies in place will increase the mental and physical health of all beings . We can grow and retain our urban nature and we should at the health and benefit of us all.

Thank you, Roniq Bartanen

98-1

www.shebirds.com

Happy Birding,
Roniq Bartanen (She/Her)
www.shebirds.com

Instagram: https://www.instagram.com/she_birds/
Facebook: https://www.facebook.com/roniq.bartanen

Ramblings at the Roost: My blog dedicated to birds and birding https://shebirds.com/blog

For occasional content celebrating the culture and joy of mindful, urban and accessible birding as well as info on upcoming bird outings visit https://shebirds.com/contact.

Members who create an account gain access to my FREE Global Female Bird Guide Resource List! https://shebirds.com/m/login?r=%2Ffemale-bird-guides

Letter 99

From: Justine Barton
To: PCD_CompPlan_EIS
Subject: Comments on Seattle Comprehensive Plan Draft EIS
Date: Monday, May 6, 2024 2:24:30 PM

CAUTION: External Email

Comments Planning and Community Development EIS,

More affordable housing is needed as the city grows. However, the attributes that draw us to work, live and play in Seattle require the natural environment be planned for and play a role as we grow -- promoting Seattle's resiliency long term, and quality of life and healthy lifestyles for all our communities. One of the best ways to provide these attributes is by preserving and restoring our tree canopy. The myriad benefits of our urban forest are already outlined in the draft EIS. The question is whether the implementation of this plan will meet the stated goals, will include both public and private property, especially given the tension when planting/preserving trees on properties that are being redeveloped/densified going forward, and will provide the reporting/feedback/information needed (i.e., staff and budget necessary) to adaptively manage our urban forest. If we are to realize the goals of walkable, healthy and livable communities, the planning for trees must include all p roperties in an up front and intentional way, and not focus mainly on public lands. In addition the temporal lag of planting new small trees to replace large trees, must be considered. I provide the following comments with our collective quality of life in mind:

99-1

* The draft EIS does not address the need to keep as many existing 6" DSH and larger trees as possible during development to immediately support public health, climate resiliency, environmental equity and sustainable urban forestry. Consider the temporal lag when planting to replace lost larger trees.
* The draft EIS does not quantify or analyze the probable scale of impact of tree loss for the alternatives, but does state that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover". How can this be substantiated?
* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Some mitigating recommendations include:

* Reduce tree loss by allowing the city to require alternative site designs for building placement on lots, including building up, joined housing units, and larger setbacks for street trees.
* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration of my comments.

Justine Barton

justinebarton013@gmail.com
6851 30th Ave NE
SEATTLE, Washington 98115-7240

Letter 100

From: Martha Baskin
To: PCD_CompPlan_EIS
Cc: Strauss, Dan
Subject: Questions Re: Draft EIS for One Seattle Plan
Date: Thursday, May 2, 2024 10:26:30 AM

CAUTION: External Email

Hello -

Will the One Seattle Plan's DEIS remove any of the 2035 Comprehensive Plan urban forest / tree canopy policies, strategies or goals? If so, which prior policies, strategies, and goals will be removed, and why?

Has the DEIS considered the difference in the average 2021 tree canopy cover between Neighborhood Residential zones compared to Multifamily zones?
• NR zones had 33.6% coverage (7.0k acres of tree canopy within 20.8k acres of land); • While Multifamily zones had 22% coverage (0.9 acres of tree canopy within 4.1k acres of land). If not, why? If so, in what way will each of the alternatives impact the long-term acreage of canopy cover within NR-zones? 100-1

Will the DEIS consider how much of Seattle's 1,600+ acres of Developed Park Land without tree canopy has the physical and logistical potential to plant medium to large trees?

Will the DEIS consider how much of Seattle's 8.0k acres of Neighborhood Residential and Multifamily Residential which has roughly 500,000 medium to large trees will be lost with the addition of 150,000 new dwellings within the next 20 years for each of the proposed alternatives?

Will the DEIS consider a significant shift in Seattle's tree canopy from private land to public land? If so, (as was done in Cambridge and Los Angeles), will the DEIS consider how much of Seattle's 11k acres of Right-of-Way (R.O.W.) without canopy has the physical and logistical potential to plant medium to large trees (when mature) and what land volume is needed to plant that quantity?

Thank you,

Martha Baskin

Letter 101

From:	Martha Baskin
To:	PCD_CompPlan_EIS
Cc:	PCD_OneSeattleCompPlan
Subject:	Liveable Cities and Seattle"s Comp Plan and DEIS - 100,000 new homes with no trees on site to mitigate heat islands, wildfire smoke, landslides and storms - and ensure equitable canopy and climate justice
Date:	Monday, May 6, 2024 1:58:14 PM

CAUTION: External Email

Hello --

While all five alternatives guarantee between 80,000 to 120,000 new homes, the "road map" to ensure affordable housing is inadequate. Instead, market rate housing dominates with those who earn less than Area Median Income left to sleep under the nearest viaduct or spew out carbon to find something affordable in an outlying area. Yet *"Housing & Affordability"* is listed as one the CompPlan's key moves.

In addition, the EIS suggests nature and trees are not needed in an urban environment, although the CompPlan touts *"Climate and Sustainability"* as one of its key moves. There is a disconnect here. Trees where people live are critical to climate resilience. Trees are critical to public and mental health. Critical to holding back storm run off and landslides. And critical to equitable canopy and climate justice. Housing versus trees is a failed policy that will exacerbate heat islands and inequitable canopy. 101-1

Furthermore,

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Instead I urge the city to reduce tree loss by requiring SDCI to mandate alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.

I also urge the city to require tree inventories and landscape plans before tree removal and building permits are issued; consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed and urge amendments to the current Tree Protection

Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

101-1
cont

Thank you,

Martha Baskin

Letter 102

From: PCD_OneSeattleCompPlan
To: Holmes, Jim
Subject: FW: Question/CommentOne Seattle Comp Plan"s DEIS --
Date: Wednesday, May 8, 2024 6:18:34 AM

From: Martha Baskin <mobaskin@earthlink.net>
Sent: Monday, April 29, 2024 1:52 PM
To: PCD_OneSeattleCompPlan <OneSeattleCompPlan@seattle.gov>
Cc: Strauss, Dan <Dan.Strauss@seattle.gov>
Subject: Question/CommentOne Seattle Comp Plan's DEIS --

CAUTION: External Email

Hello --

Page 3.3-5 of the DEIS states "Notably, most canopy loss was not associated with development activities; only 15% of the canopy loss occurred on parcels that underwent development during that period." The authors of the 2021 Tree Canopy Assessment defined "redeveloped parcels" as sites that began and completed construction of new buildings that added residential units or new commercial buildings within the identified timeframes."

102-1

This restricted definition of development-associated tree loss has supported a misleading narrative that development is not an important driver of canopy decline in Seattle.

A canopy change analysis from Washington Department of Fish and Wildlife determined that at a minimum, development or redevelopment of parcels in Seattle was the agent of change for approximately half of all tree loss that occurred between 2009-2017. The highly restricted analysis of development in the city's 2021 canopy assessment is interesting and useful for comparing effects of fully completed projects to parcels not having undergone development, but it is not a full measure of the overall impact of development on tree loss in Seattle.

The findings from that analysis are not robust enough to defend a claim that development is not a significant source of tree loss.

Please let me know how you plan to address.

Sincerely,

Martha Baskin

Birds Connect Seattle Conservation Committee

April 29th, 2024

Letter 103

May 23, 2024

VIA EMAIL

Office of Planning and Community Development
Seattle City Hall
600 4th Avenue, 5th Floor
Seattle, WA 98104
Attn: Jim Holmes; Rico Quirindongo
Email: PCD_CompPlan_EIS@seattle.gov

Re: Support for Alternative 5; Corridors Concept and multifamily development at 4822 S. Holly Street

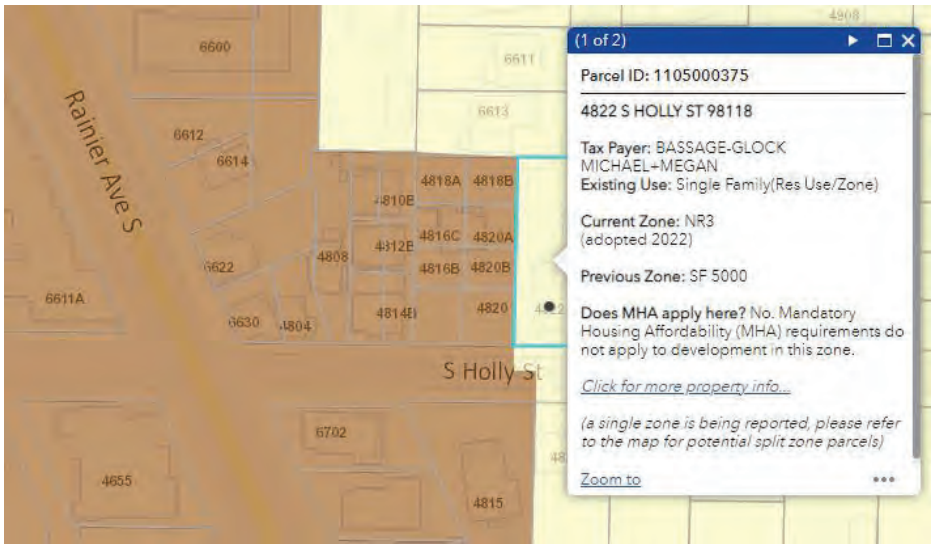
Dear Mr. Quirindongo,

Thank you for the opportunity to comment on the One Seattle Comprehensive Plan Draft Environmental Impact Statement ("DEIS"). 103-1

We write to express support for Alternative 5, but in particular we support the Corridors Concept, allowing for multifamily development extending generally for two blocks from transit arterials. Our property is located within a block of Rainier Avenue S, but remains zoned NR3. It would best serve the City's housing goals as a potential location for multifamily. We ask that the FEIS study multifamily uses consistent with the Corridors concept, or at minimum the Urban Neighborhoods Concept below. We have provided more information below.

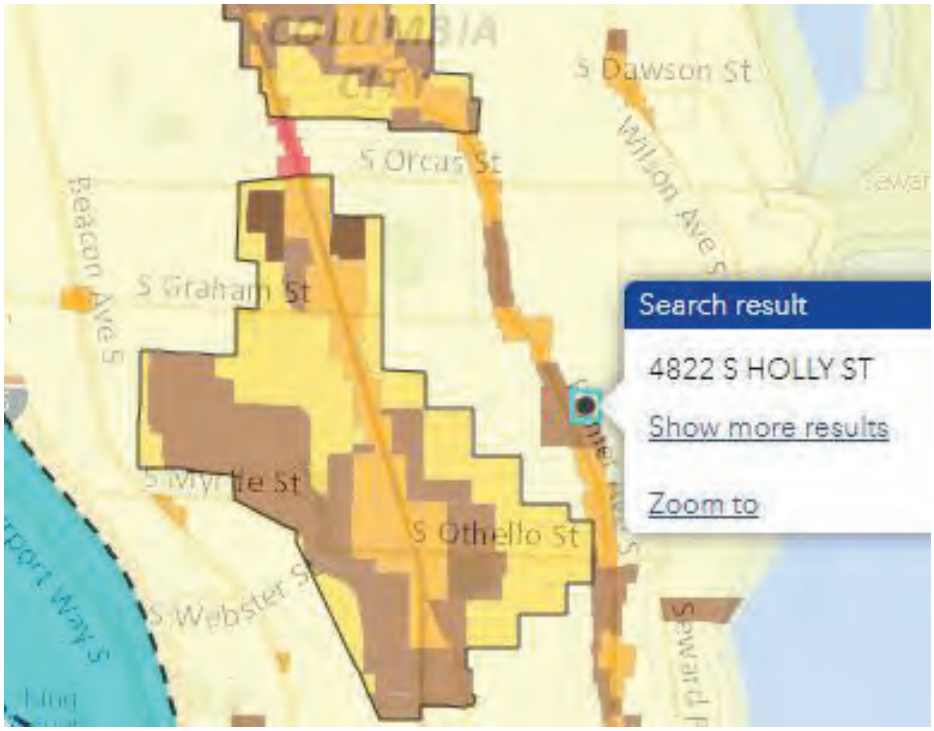
We own the property located generally at 4822 S. Holly Street ("Property") in the Rainier Valley neighborhood of Seattle. The Property is a 7200 square foot lot, shown below in yellow, that is currently only developed with our 960 square foot home. Our property is adjacent to townhomes to the west, and otherwise surrounded by single dwelling units in the immediate vicinity.

Currently, the Property is zoned Neighborhood Residential 3 ("NR3"). It is adjacent to the Lowrise 3 ("LR3") zone surrounding the Rainier Avenue S corridor. An image of the current zoning is provided below.



103-1 cont

As you know, this location along Rainier Avenue S is not currently within an urban village. Yet, Rainier Avenue S is a primary transit corridor leading to Downtown.



The neighborhood can accommodate more homes, and should also be zoned to allow retail to serve this area where viable. It is generally underserved by quality grocery, retail, and childcare services.

Given the City's dire need to address housing affordability, we would like to express our support for Alternative 5, which pursues the widest range of options and area for added residential density. We particularly support the Corridors concept, and believe it should be applied on Rainier Avenue S. We could encourage you to consider expanding dense, mixed-use zoning designations along the entire Rainier Avenue S corridor so that it can become more vibrant. As a part of that strategy, please study extending multifamily zoning, such as LR3 or higher across our Property.

It is a great opportunity for denser multifamily development near transit, and would be a missed opportunity if it remains NR3.

If you would like more information about the Property or its development potential, please do not hesitate to contact me.

Sincerely,

Megan and Michael Bassage
4822 S Holly St.
Seattle, WA 98118
mbassage@gmail.com

103-1
cont

DEIS StoryMap Comment

Name: Elizabeth Bastian

Email: lizziebas92@gmail.com

Date: 4/27/2024

Comment:

I am a renter in Greenwood, and I believe that the City of Seattle did not listen to the overwhelming majority's call for an Alternative 6 vision, which would allow for more sustainable, car-free or car-light living. Instead the current draft plan will worsen the many crises (housing, climate, unaffordability) our city faces. To create a more vibrant city, the plan should ___

104-1

In Green Lake in particular, I think that the plan should allow for high-rise apartments to provide affordable housing near a gem.

From: Joseph Beauregard
To: PCD_OneSeattleCompPlan; PCD_CompPlan_EIS
Cc: Harrell, Bruce; LEG_CouncilMembers; Sea Physi105
Subject: Comprehensive Plan
Date: Monday, April 8, 2024 8:56:50 AM

CAUTION: External Email

Neighborhoods make Seattle a wonderful place to live. While I realize I can't stop the developers' wrecking ball, I would like to make some general comments for your consideration.

-- To date developers seem only able to build large apartment blocks with small apartments or tall, narrow, small, expensive townhouses. These have minimal apparel to families, the elderly, or the disabled. If all we want in the Seattle of the future are singles and childless couples, well then let what appears to be an architectural community with little imagination have at it. I would hope we want more than that. 105-1

-- Cramming 4 separate homes onto small city lots means the townhouses described above. As you drive around the city, do you really want block after block after block after block of nothing but these small tall (generally expensive) townhouses?

-- Please enact a meaningful tree protection regime. Right now, absent project by project outcry, developers wipe out as many trees (and all other vegetation) that they possibly can. I would hope we could make developers save every tree. They will say projects will be too expensive. Well, projects aren't sold based on what they cost to build. They're priced at what the market will bear. If wealthy developers make a little less profit by saving the city's trees; is that a bad thing?

-- Trees provide some heat wave and climate change relief. Why are we allowing them to be wiped out?

-- If you want to increase available housing quickly -- ban Airbnbs and Vrbos.They're all over the city, and provide no housing for actual residents.

-- Instead of tearing down perfectly good single family homes and wiping out mature trees so that developers can cram small expensive townhomes onto small city lots; why not preserve the housing that exists and provide tax incentives for converting it into multiple dwelling units?

-- The fact that areas like Broadmoor and Windermere are exempt from any burden related to increased density is just wrong.

-- The plan apparently wants to encourage more people to bike and use public transit. Most families, elderly, and disabled won't be found biking. If you want people to use public transit, make it safe, which right now it's not.

-- Recognize that neighborhoods that have predominantly single family homes do provide value to the city -- stability, families, beauty, less congestion, and relative safety, to name a few.

So in summary, make the city welcoming to all not just singles and childless couples, make it safe, and save our trees. Don't let developers ruin a wonderful city.

Best,

Joe Beauregar

105-1
cont

From: Joseph Beauregard
To: LEG_CouncilMembers
Cc: Harrell, Bruce; Sea Physicist; PCD_CompPlan_EIS
Subject: Increase Housing Supply Overnight
Date: Monday, April 22, 2024 9:20:05 AM

CAUTION: External Email

You can increase the housing inventory virtually overnight. No trees have to come down. No nice old homes have to be demolished to make way for tall, small, expensive townhomes.

Ban, or severely restrict, AirBnBs and VRBOs.

106-1

See attached article about the problem these create for Hawaii. By banning or limiting these you increase available housing for actual residents.

Just a thought.

Joe Beauregard

https://www.seattletimes.com/business/hawaii-lawmakers-take-aim-at-vacation-rentals-after-lahaina-wildfire-amplifies-maui-housing-crisis/

From: Jason Beffa
To: PCD_CompPlan_EIS
Cc: Hollingsworth, Joy
Subject: Protect Urban Tree Canopy - Make the Seattle Comprehensive Plan Better
Date: Friday, May 3, 2024 1:09:40 PM

CAUTION: External Email

After reading the One Seattle Comprehensive Plan, I was extremely disappointed in the brazen disregard for the value, protection, and new development of the urban tree canopy around the city of Seattle. This plan is WAY to developer friendly, and while Seattle does indeed need more housing, we 1000% need to do more to protect trees in this city to mitigate the obviously drastic effects of climate change for the urban population.

107-1

I support Tree Action Seattle, and the questions they have raised are specifically targeted at some of the very weakest points related to trees in the OneSeattleComp:

1. Section P 3-3 states that “none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild.”
   - What is the impact of the plan specifically on Seattle’s plants and animals?

2. *S*ection P 3-3 states that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover."
   - What analysis shows that tree planting programs, coupled with increased hardscape, will compensate for lost urban forest?

3. The plan states that Seattle will make progress toward its 30% canopy goal. The new tree ordinance substantially reduces private land available for trees.
   - How much public land is available to reach the 30% goal? How many trees will need to be planted in these areas every year to make up for trees removed by development?

For my own question:
How is the city planning to curb the illegal removal of trees by developers without permits and no intention to replace like sized, indigenous trees?
This is a clear and obvious problem, especially in high development areas like the Central District where tree canopy is already scant.

Please address these questions and the issue of disappearing tree canopy in this plan. Development does not have to be clearcutting, and new shrubs do not replace high value tall trees.

Thank you.

Jason

Letter 108

From: Arnold Bendich
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 7:34:34 AM

CAUTION: External Email

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

108-1

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Arnold Bendich
jebendich@comcast.net
1754 NE 62nd St
Seattle, Washington 98115-6821

Letter 109

Judith Bendich
1754 NE 62nd St.
Seattle, WA 98115
May 6, 2024

To: OneSeattleCompPlan@seattle.gov
To: PCD_CompPlan_EIS@seattle.gov
cc: Bruce.Harrell@seattle.gov , maritza.rivera@seattle.gov

This letter addresses (1) the need for housing for all economic segments of our city (as required by statute); (2) the need to preserve our current diminished - 28%, down from 30% - tree canopy and how to reach the 47% tree canopy policy required in the 2035 Comprehensive Plan (tree preservation and enhancement is also statutorily required); the need to preserve our historic resources and mitigation that could accomplish that goal. The Seattle One Plan and the DEIS do not adequately address any of these issues.[1]

Preface. My husband and I are long-time Seattle residents. He is a retired UW biology professor and I am a retired attorney. We love Seattle. We came here in 1965. Our first home was a rental which we purchased during the Boeing bust. In 1990, we moved 5 blocks to our present home. We have seen many changes, some better, some worse, but what we have always loved is Seattle history, its varied architecture, its parks, which we visit frequently, trees, and neighborhoods with their own identities and character. We didn't like when we got here racism and sexist laws. I grew up in segregated Baltimore, where my family fought for civil rights and didn't participate in white flight to the suburbs. (I learned about police brutality toward Blacks from my teenage neighbors' experiences.) We disliked Seattle's "whiteness", and I was "warned" early on not to live in the Central District. Racial justice, equal rights for women, and economic justice were my primary reasons to go to law school, graduating from the UW Law School in 1975. By that time abortion was legal without a husband's consent, non-discrimination laws had been enacted and amended to include disability, and in 1972 voters approved the Equal Rights Act. (The parameters of these laws were undeveloped.) But vestiges of earlier times remain, and the more recent MHA implementation purportedly to improve housing, health, and physical environment for all economic segments of our residents worsened the situation. The draft Seattle One Plan continues to turn a blind eye toward Seattle's real housing and environmental needs. 109-1

Experience With the MHA Process That Remain Pertinent Today. We live in the Ravenna-Cowen North National Historic District (NHD). I am a board member of Friends of Ravenna-Cowen, a fully volunteer organization, which achieved Washington State and National status for the NHD. After retirement from my law firm, I successfully represented my organization in the MHA administrative hearing and advocated before the City Council so that the NHD was exempted from MHA upzoning. In that hearing, in addition to historic resources, I learned a lot about trees and the environment, the lack of infrastructure (such as wooden sewers in West Seattle and combined sewers in most residential neighborhoods that overflow into Lake Washington and Puget Sound), slow response time by the police and firefighters, the dearth of resources such as trees and parks for our underserved communities, displacement, false promises and inadequate and concocted "data" by OPCD witnesses who withheld data, obfuscated to the public and in the hearing. (One OPCD employee was caught lying under oath.) OPCD maintained that with MHA, developers would include up to 50% of the units as "affordable." A complete fiction: since its implementation, only about 5% of new projects include affordable

[1] All the scenarios of possible growth plans from 2 to 5 have major problems with respect to tree preservation and inadequately address housing for all economic segments of our residents. If I were forced to choose, but only after remedying the draft Plan's and DEIS's inadequacies, the least harmful choices would be 2 and 4 since building up not out would result in less destruction of trees; additional mitigation options are required and facts and factual analysis are required throughout.

units. MHA's fee schedule was lower (and still is) than other municipalities. OPCD was required to identify the actual locations where displacement could occur due to MHA upzoning. OPCD had the data down to the actual lot and buildings. But it did not divulge these data to the City Council or the public. We have now seen the aftermath, massive displacement in the Central Area and elsewhere. We have seen our thriving neighborhood small businesses shuttered. Our most needed housing is for moderate income workers, lower income, and people without housing. Affordable housing is nearly non-existent, tree canopy is routinely destroyed. OPCD's "expert" promoted trickle-down Reaganomics - that more housing units would be built, and this would lead to reductions in housing costs. The reverse is true. Developers thrived, housing costs soared, and heat islands arose due to massive coverage - whole blocks and blocks - with no trees or green cover. The issues raised in the MHA hearing continue to exist today, and worsened. Because of this experience, I will never believe OPCD's "data," its conclusions, and expect that OPCD will obfuscate, will not provide data and estimates based on fact to substantiate its conclusions, or provide the real data we need to adequately provide for the future. ***The City Council should review with skepticism OPCD's proposals and projections, insist that everything be backed up by facts, and demand new evidenced-based information in compliance with state law so that we can have a vibrant city that that houses all its residents in a healthy and safe environment.***

109-1 cont

The Need for Protection and Mitigation for State and National Historic Resources, Including National Historic Districts. Friends of Ravenna-Cowen has submitted its comments, which include an analysis of Goals and Policies that are proposed, the need for additional policies in the Seattle One Comprehensive Plan, the deficiencies of the DEIS, and how to mitigate the potential harm. The comments discuss in detail historic resources and the steps the City can take to preserve them. The organization's mission statement also includes preserving the NHD's natural environment; the NHD has mature trees, large shrubs, and green cover. The comments set out in detail the impacts on trees and birds (which are not enumerated in the DEIS) and ways to mitigate potential environmental damage. There are other points as well that address the DEIS, lack of meaningful mitigation and baseless hypotheses, with no factual data. Friends of Ravenna-Cowen's comments and recommendations are incorporated into this letter by reference.

Essential Language and Factual Information Missing in the Seattle One Plan and the DEIS.

The Plan and DEIS do not provide adequate data, information, and definitions to comply with multiple statutes' mandates. Numerous questions remain unanswered that should be answered so that the City Council can make reasoned decisions, goals and policies:

E2SHB 1110 mandates that Seattle add 100,000+ housing units by 2045. It mandates rezoning almost all Neighborhood Residential ("single-family") lots to four units, or six units within ¼ mile of rapid transit, called "middle housing." And it has definitions throughout, many of which are missing from, and must be included in the draft Plan and DEIS.

For example, the definition of "middle housing" in E2SHB 1110, p. 5, para (21) (lines 32- 35), "*means buildings that are* ***compatible in scale, form, and character*** *with single-family houses* ... ["single family" is defined at p.7, para.32, lines 32-34.]) These definitions are not in the draft Seattle One Plan or the DEIS, but they are statutory, and the boldened language is essential so that builders and their architects know how the project must be designed and so that the Department of Construction and Inspection adopts regulations that comply with the law. The language is essential for design review, whether administrative or with public input.

The Plan Fails to Follow the Mandate of State Law For All Economic Segments.

o E2SHB 1110 mandates adequate provisions for existing and projected needs of all economic segments of the community and sets out definitions for four segments - less than - 60% of AMI for renters, 80% of AMI for owner-occupied and "low-income family," and at or below 30% AMI for extremely low-income households.

o The DEIS Executive Summary states the objective for affordability is: "Increase the supply of housing to ease increasing housing prices caused by limited supply and create more opportunities for income-restricted housing." There is no evidence that this dependence on supply-side, trickle-down housing works, or that it has worked to reduce housing costs to a level affordable to modest income and low-income people. This is the same **theory** posited in the MHA EIS, but during the past 5 to 10 years Seattle has had the most extreme cost increases in rents ever experienced in Seattle.

o The draft Plan needs to meet the requirements of HB 1220, now codified in RCW 36.70A.070(2). Those requirements are for the draft Plan to identify the needs for housing units for households at every economic income level and plans for how the City will meet those needs. The draft Plan fails to provide any plan to meet these needs, particularly for lower income residents and working families of modest income.

109-1 cont

o As part of this increased goal, the draft and final Plan should assess what radius to include in various settings and how to ensure via good planning that neighborhoods transition from higher to loser density with distance from the fixed transit and commercial center.

o There is no meaningful discussion, new proposals or consideration in the draft Plan of appropriate policies to prevent displacement in the identified areas with high displacement potential for people, households who currently reside in housing that is affordable for persons in the below median income levels. Indeed, the Plan and DEIS leave the City and public without a clear view of the likely degree of loss of "naturally" occurring affordable housing and alternatives for preserving communities and affordable housing opportunities in these high risk areas and elsewhere. This is precisely what occurred with MHA implementation. For Central Area residents, MHA was catastrophic. Although OPCD had these data for every urban village, by lot and building, and could identify low-rental units and lower-income home owners by census data, none of this information was provided to the City Council or the public. (For owner-occupied homes, OPCD can use census data tract-by-tract, which provides residents' income and ages. OPCD has all this census data.) More broadly, Seattle can identify such data city-wide, not only in the identified areas. Seniors, the disabled, and those with lower incomes or modest incomes reside in previously middle-income neighborhoods and can be forced out due to upzoning. Census data can identify these vulnerable households. The Ravenna-Cowen NHD, for example, has several community households with a large number of unrelated adults who live in a rented house. It also has retirees and people with disabilities, with less income, but who bought their homes years ago. Some live with extended families; the loss of one wage earner or unexpected debt can force them out of their homes. While the situation is dire and more concentrated in the identified areas, the same situations exist city-wide.

o Statutory requirements, RCW 36.70A.070(2)(c), include identifying "sufficient capacity of land" to meet the identified needs for housing that is affordable to each economic segment of households in the City, but such information is absent from the draft Plan and DEIS.

o The Plan does identify land for duplexes, triplexes and town homes (four units per lot in each residential area and six units when closer to major transit stops). But the draft Plan and DEIS do not propose or assess any strategies for designating land or what portion of available land that will be available for the required units of housing to be built that is affordable to persons in each income segment below median income. The number of units identified as needed for households below 120% median and above the levels eligible for publicly-

supported subsidized housing dwarfs the number of units projected as needed for households over 120% of median. The Plan lacks any proposal and analysis of how the City will meet this need for housing for persons of modest income who are often the backbone of our workforce that we want to attract and keep in Seattle, such as educators, workers in health care, social workers, service workers, hospitality workers, many governmental employees, and police and firefighters.

o The draft Plan does not include any provision to ensure that modest income working households will be able to afford housing in the areas of increased density in Regional Centers. The City should include a commitment to revisit the HALA program to have housing which is affordable at different income levels in all housing that benefits from proximity to the massive public investments in transit and other infrastructure. The City could consider using a form of tax increment financing to capture the greatly increased value of properties near our public transit and infrastructure investments., *e.g*., NE 130th St. Station upzone area, and devote the revenues to providing affordable housing in those units. This could be done either through direct subsidy of rent or purchase or building units (with nonprofit partners).

o This, of course, could be included as an anti-displacement strategy. For example, the draft Plan and DEIS do not consider new approaches to use of the Multi Family Tax Exemption, or even if it would be more cost effective to stop losing property tax revenue in exchange for a small portion of units being set aside in MFTE developments and, instead, use the increased revenue to provide funds for building new affordable units and providing subsidies.

o The City should also substantially raise MHA fees, which were woefully low from the outset, and mandate affordable units in all new construction.

o The Plan should commit to ensuring that new housing developments that benefit from proximity to the taxpayers' massive investments in light rail, fixed transit and other infrastructure do not result in windfall profits and exclusive high-income housing. Increased housing density near public investments in transit should be accompanied by a change to HALA policies to require inclusion of affordable units of housing in new developments taking advantage of increased density allowances. Equity and improving access to the benefits of transit and other public infrastructure should be reflected in adoption of policies to ensure that a significant number (20-25%) of housing units in these areas serve the City's goals to provide affordable housing for persons (and family units) at the below 30%, 60%, 80% and 100% AMI levels. Why should the beneficiaries of the increased housing around public investment in transit go only to the highest income level households? Why should the developers of these properties not be required to share the windfall from the public investment by including housing for lower income households?

109-1 cont

Tree Canopy and Climate: Tree Preservation and other Environmental Elements Are Not Inadequately Addressed in the draft Plan and DEIS. Required Mitigation Measures to Achieve Policies Are Not Addressed or Proposed in the Draft Comprehensive Plan or SEPA Review/DEIS.

On p. 150, Goal CE G12 refers to the tree canopy goals and lists several related policies. The following goals/policies should be added:

109-2

- Strengthen and enforce tree protections throughout the City to ensure Seattle's current canopy tree policies and goals continue. The draft Seattle One Plan would inexplicably reduce the goals and Policy in the existing 2035 Comprehensive Plan.

The 2035 Seattle Comprehensive Plan includes Policy EN 1.2 (p. 133) which states, "Seek to achieve citywide tree canopy coverage to **30 percent by 2037, and 40 percent eventually,** which maximizes the environmental, economic, social, and climate-related benefits of trees." This is **current Seattle policy**. However, for unexplained reasons, without discussing the adverse implications of this major reduction in tree canopy, the Seattle One Plan changes **current policy to a *goal* of 30 percent with no increase over time.** Moreover, the goal, CE G12 (p.151) *makes a false statement of fact.* The actual current tree canopy is 28 percent due to a loss of 235 acres, the size of Green Lake. CE 12 maintains "Seattle has a healthy urban forest [which it does not due to climate change] with a tree canopy that covers at least 30% of the land", which is false.

109-2 cont

The results from this failure to properly address the required climate change and tree canopy policies and lack of inclusion in the draft Plan and lack of analysis in the DEIS are existential, including:

- a tremendous loss of mature tree canopy as the City falls further and further behind from its adopted policy goal for 30% tree canopy coverage by 2037;
- adverse health impacts from loss of tree and green space (particularly for overburdened or highly impacted communities);
- health impacts will almost certainly include increasing mortality and hospitalizations of vulnerable populations due to projected increasing days of severe high temperature with the highest temperatures in residential areas that lack tree canopy and whose residents have the most adverse social determinants of health (e.g., overburdened and highly impacted communities and populations under the State HEAL Act).
- adverse impacts due to increased storm water runoff, including stream erosion, contamination entering surface waters, harm to salmon or fish habitat and recovery and biological diversity in surface waters and shoreline habitat;
- impacts on meeting legal requirements to reduce combined sewage overflows and lack of mitigation for increased runoff from increasing impervious surfaces from other plan policies.

The DEIS recognizes that mature tree canopy reduces pollution in runoff, which is toxic to fish, in addition to the benefits in regard to heat and climate resiliency.[2] Much of the mature tree canopy and habitat in Seattle's residential neighborhoods, which are home to nearly 50% of the tree canopy despite being a much lower percent of the total land area, are evergreen trees. Evergreen, including Douglas Fir and Cedar, are documented to intercept 27 to 66% of precipitation (preventing that from reaching the ground to be rapid runoff). This is far more than deciduous trees. Seattle's existing native mature tree canopy has a far greater percentage of evergreen trees, which intercept and prevent stormwater runoff, than deciduous. However, tree replacement, especially street tree planting, is primarily deciduous and of much smaller canopy, resulting in a far greater relative increase in stormwater runoff. Preservation of mature tree canopy in residential areas is, therefore, essential mitigation to accomplish the City's Tree Canopy, Climate and runoff goals and policies.

HB 1181, Chapter 228, Laws of 2023, requires cities to incorporate climate change goals and elements in comprehensive plans. There is a concomitant requirement to address climate change impacts and related policies in the Environmental Impact Statement (EIS) accompanying the draft comprehensive plan. RCW 36.70A.070(9) now requires that the City's Comprehensive Plan: "Must enhance resiliency to and avoid the adverse impacts of climate change, which must include efforts to reduce localized greenhouse gas emissions

[2] Other than fish, the DEIS does not address that a mature tree canopy is essential for birds, both native and migratory, and that green cover provides homes to other animal species. The draft Plan and DEIS do not identify the location of, or enumerate, native flora and fauna. Without this information, the impact on our natural environment of each scenario (2 through 5) cannot be determined. See Birds Connect and Friends of Ravenna-Cowen's comments, which address these issues.

and avoid creating or worsening localized climate impacts to vulnerable populations and overburdened communities."

Neither the draft Plan nor the DEIS adequately consider how the loss of tree canopy, which has already been documented by the City, and which will accelerate under the draft Plan, will result in increased "heat islands" and adverse health effects on vulnerable populations and overburdened communities from reducing tree canopy. Indeed, the draft Plan and EIS are required to have strategies to reverse the documented loss of tree canopy reflected, resulting in Seattle now being further from its goal than when the goal was adopted. The Climate section of the draft Plan refers to a Climate and Environment Policy CE 9.313: "***Expand*** **tree canopy and greenspace**, especially in communities that experience disproportionate impacts of extreme heat and smoke events." (Emphasis added.) But the *goal*, not even a policy, is a stagnant 30%. **109-2 cont**

The City is losing tree canopy. Thus, a plan is required along with analysis of alternatives and mitigation measures to not only stem the loss but to "expand" tree canopy. No plan is presented. The Tree Canopy section is devoid of any plan or meaningful discussion. Most notable, there is no plan or discussion relating to how the development goals will be coordinated with proactive policies to preserve and increase mature tree canopy in residential areas, where most of the tree canopy, and most of the risk for loss of canopy under the draft Plan will occur. Policy CE 12.614 refers only to City property and street rights of way which cannot meet the goals: Preserve, restore, maintain, and enhance tree canopy on City property and rights-of way.

Street trees offer far less of the benefits than large mature trees. CE 12.8 recognizes this with a policy goal: Encourage the protection, maintenance, and expansion of tree canopy throughout the community, prioritizing residential and mixed-use areas with the least current tree canopy to equitably distribute benefits. How will the City "encourage" protection, maintenance and expansion of tree canopy?

Mitigation is required for specific climate, environmental and human environment (including environmental justice) policies that are adversely impacted by competing policies. The draft Plan and DEIS fail to adequately address that it is not possible to retain or replant trees when the land area is covered by new structures. The Seattle Comprehensive Plan should follow Portland's example by acknowledging that the only means of achieving 30-percent equitable citywide canopy cover is to designate at least 40% of the residential lot area with space for trees.

The DEIS discusses the in-lieu fee program which may result in increasing tree canopy in overburdened communities that currently have less than 25% tree canopy. While this may provide vitally important benefits, it is nonsensical to cut mature trees in one area while replacing them with new trees that require approximately $5,000 for their first four years of survival and require 15 to 60 years to grow to maturity. This scheme is untested and does not account for the reality that it would take many years for the new trees to provide the same net benefits of the cut trees. Nor does the City consider the reasonably foreseeable adverse impacts on the areas (and streams) that will lose tree canopy. The City needs to do both, maintain the trees we have and plant more trees in overburdened communities.

The DEIS and draft Plan do not consider the reasonable alternatives for revising the City's Tree Ordinance, including measures which would assist in reaching the goal or reducing loss of canopy, such as applying the ordinance evenly to all areas/zones in the City.

The DEIS explicitly states that none of the alternatives considered include any proposal to improve regulation or incentives to reduce the pace of tree canopy loss, much less to reverse and make progress towards the goal of having 30% canopy coverage by 2037, which would gradually be to 47% current policy under the 2035 Comprehensive Plan.

The DEIS does not even acknowledge that many of the housing projects which might adversely affect the tree canopy retention policies will be exempt from further SEPA review under the City's adopted categorical exemptions. This will preclude consideration of area specific or cumulative impacts from multiple individual developments authorized under the Comprehensive Plan and Development Ordinances.

109-2 cont

The DEIS acknowledges the obvious: that the existing tree ordinance and policies are failing, as shown in the loss of canopy. But, **without any analysis**, the DEIS asserts that the new tree ordinance will reverse this. However, the City refused to do an EIS or new analysis on the drastically revised ordinance that the Council passed. Thus, there is no analysis or basis for statements that the new ordinance will improve performance towards the goal. Further, the DEIS acknowledges that the new ordinance anticipates replacing mature canopy with street trees. SEPA requires environmental analysis of the impacts – and mitigation measures – for such a switch since the record establishes that street trees cannot replace the heat, habitat, stream protection and stormwater benefits of mature trees. To reflect the adopted Tree Canopy goal and required climate change element, and SEPA requirements for mitigation to achieve polices, the Comprehensive Plan and EIS should:

o limit building coverage in Neighborhood Residential to no more than 60% of the lot, or limit new construction to the footprint of the original house; the latter serves two purposes (a) a house can be re-purposed and rede-signed interiorly to preserve it, including its historic history, and preserving the existing structure eliminate increased environmental waste from bulldozing buildings, or (b) if leveled, most trees and green space could be preserved;

o explicitly include increased height bonuses or adding other residential unit area for preserving the entire tree canopy space required to keep existing significant trees healthy;

o include mitigation measures to apply the same tree protections and requirements for retention and permitting/ review for removal by existing property owners to all new development in residential zones;

o adjust FAR ratios for each zone, to accommodate tree preservation;

o commit to requiring that the height bonus be utilized rather than merely being an option, as under current code, for developers to save significant trees by increasing development height or square footage elsewhere above what would otherwise be allowed to compensate for the area of the development reduced to ensure that significant trees on the property or adjacent properties are preserved and healthy. *E.g*., developers of a five-story building currently have a choice to remove a tree in the proposed building envelope, or to save the tree and add replacement footage. Mitigation and commitment to the Seattle Tree Canopy Goal and required Climate goal per HB 1181, Chapter 228 Laws of 2023, should result in the Plan and mitigation commitments under SEPA including this change which honors both increased housing unit goals and climate and tree preservation policies.

o Provide examples of developments that meet increasing housing goals (including reflecting the requirement to allow various types of housing with four to six units per lot, depending on location) while preserving healthy existing mature trees on a development lot;

o Commit to adoption of an ordinance adjusting lot split and short plat lot lines to maximize preservation of existing mature trees as an element of required mitigation and commitment to the City's tree canopy and climate goals.

109-2 cont

o Commit to increasing height for residential units in regional and neighborhood centers and expanding those centers along the entire arterials that have infrastructure completed or committed to for both light rail and bus rapid transit with the 800 foot walkable diameter zone (and fully consider on a local basis whether to expand each from three blocks/800 feet to a quarter mile/five blocks with decreasing height and FAR moving away from the transit stop); and, couple this with the tree preservation mitigation elements above to prevent this expansion from adversely affecting climate resiliency due to loss of further mature tree canopy.

o Include consideration of potential mitigation requiring both street tree planting and small pedestrian or child-friendly public access areas with larger shade trees within developments close to transit. Adjust the FAR to include increased height potential for meeting a required inclusion of plazas with trees, seating areas and play structures.

The DEIS Conclusions Are Factually Unsubstantiated, Would Result in Adverse Health Effects for All Seattle Residents, and Are Contrary to State Law.

The DEIS concludes, "Action alternatives would tend to increase regional tree canopy by focusing growth in urban areas and preventing sprawl." "[D]evelopment within the urban environment of Seattle could *indirectly* benefit the tree canopy pressure in less-developed areas outside the city." (Emphasis added.) In other words, it's fine to decimate Seattle's tree canopy because tree canopy could be preserved regionally. The DEIS does not identify any data supporting an indirect benefit that regional tree canopy would increase, not even the acreage currently remaining that is less developed. Sprawl continues, with suburban areas with lawns that do not provide needed habitat for birds and other wildlife. Nor does the DEIS identify the reasons people seek housing outside Seattle. And, apparently, no one at OPCD has bothered to traverse the "region." King County and abutting counties are rapidly becoming one big sprawl as people search for more affordable housing options outside of Seattle. Moreover, state law (E2SHB 1110) now requires most municipalities to increase density, which could mean more tree cutting region-wide. The DEIS conclusions are actually an unsupported hypothesis bordering on the fantastical.

The reality is that if real mitigation to preserve Seattle's tree canopy is not implemented immediately in compliance with the requirements of HB 1181 and RCW 36.70A.070(9), Seattle will continue to lose its tree canopy and will become a polluted, heated environment adversely impacting the health (including increasing mortality) for all its residents, and native flora and fauna. One only has to look at the Roosevelt Urban Village, where within five years, multiple apartment buildings filled entire blocks (once covered with trees and green space), and transformed the area to a heat island.[3]

[3] Representative Gerry Polett's comments also address high buildings facing City parks. The DEIS tosses proposal out without any analysis of the environmental harm that shade, run-off, *etc*. could cause. The same is true of the cumulative environmental impact of increased development on City parks. At the MHA hearing, a UW professor who studied and implemented restoration projects, including Ravenna Park, testified about the predictable negative effects to the park of upzoning, considering the cumulative impact.

Summation.

The comments here touch on a few of the topics covered by the draft Plan and DEIS. But these are critical and existential. Without adequate housing for all economic segments of our City, we will continue to see negative impacts on moderate income workers and their families and on lower income residents and their families, with concomitant negative health outcomes. Decent and affordable housing is a basic human right.

109-2 cont

Trees are the best and most effective environmental protection we have. Trees capture carbon, reduce heat, water run-off, pollution, and erosion. Trees in neighborhoods reduce crime and bring a sense of personal wellbeing. Trees are essential to our physical and mental health. Two centuries ago, Alexander van Humboldt (1767-1835) recognized the importance of trees to reduce temperature, stem pollution, retain water, prevent erosion, and protect wildlife. He shared his observations with Thomas Jefferson and with Simon Bolivar, who then began a project to plant one million trees throughout South America. Scientists today can measure trees' benefits. Economists can quantify trees' benefits into dollars. Yet Seattle, which calls itself the Emerald City, proposes to decrease its tree canopy goals and reduce tree protection.

The draft Seattle One Plan and DEIS pay lip service to trees; the DEIS is devoid of data, fails to identify meaningful mitigation to maintain the trees we have and grow more trees. There are ways to preserve trees and to increase housing. Commentators have suggested many ways to do so. Some architects are already doing so. The City Council and Mayor need to do their part so that we can have a vibrant, real Emerald City that houses all its residents in a healthy and safe environment.

Hoping you will do the right thing,

/s/

Judy Bendich

Water flow down the steep sides of Ravenna Park is mitigated by the dense tree canopy and green cover not only in the abutting neighborhoods (the Ravenna NHD and the University Park neighborhood on the south side), but also from neighborhoods as far north as Mapleleaf. That is because the water to the park runs downhill, percolates through the glacial soil, and on its way is moderated and deflected by trees. With more impermeable surface, without trees and green cover, the water would pour down the steep sides, resulting in erosion pollution of Ravenna Creek, which joins with other streams to flow into Lake Washington and ultimately Puget Sound. The neighborhood trees and green cover also lessen pollutants and heat. Heat recudtion particularly crucial for our native conifers and native plants that are not heat tolerant.

Letter 110

From: Ericka Berg
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 6:44:41 AM

CAUTION: External Email

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover" 110-1
* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Ericka Berg
ericka98115@gmail.com
14035 Burke ave north
Seattle , Washington 98133

DEIS StoryMap Comment

Name: Brennen Berkley

Email: brennenfromseattle@gmail.com

Date: 4/22/2024

Comment:

I would like to see some bolder options considered in this plan, specifically around building more housing than alternative 5 suggests. Adding 120,000 more homes sounds great, but why not make that number higher? Even if not all of those possible homes get built, having more flexibility in where developers can build will increase the housing supply and help combat continually rising rents

111-1

DEIS StoryMap Comment

Name: Brennen Berkley

Email: brennenfromseattle@gmail.com

Date: 4/22/2024

Comment:

The proposed EIS doesn't adequately address the existing harms caused by cars in our city. It touches on the noise and pollution concerns, but fails to address the hundreds of Seattleites who are killed or seriously injured every year on our roads. This plan consistently highlights the inevitable increase in traffic and noise resulting from more housing development, yet it offers no significant mitigations. 112-1

This is unacceptable to me. Most of our streets are not safe for people outside of a car, something I can personally attest to as I was hit by a car in Seattle a few years ago. These problems will only get worse as we build more housing along busy arterial roads. With only six more years left to meet the city's Vision Zero goal of eliminating car-related fatalities by 2030, we should be exploring more aggressive options for making our streets safer. Options like pedestrian-only streets, traffic calming, narrowing or removing car lanes, and installing speed cameras on our busiest roads.

20% of Seattle households already live car-free, and we should be pursuing bold alternatives that will increase that number by making it easier and safer to navigate the city without a car.

DEIS StoryMap Comment

Name: Scott Berkley

Email: berkley47@gmail.com

Date: 4/6/2024

Comment:

113-1

Please study the following:
* 6 story, 6 unit stacked flats in all neighborhoods on any lot that allows housing
* 4 story, 12 unit apartments in all neighborhoods on lots of at least 4,000 sf
* 40 story high rise mixed use + apartments in all areas within 0.5 miles of a light rail stop or bus rapid transit stop

For the "Greenhouse Gases & Climate Change" analysis, please analyze the *regional* GHG emissions under scenarios in which regional population is fixed, but additional housing in Seattle allows 100k, 200k, or 300k more residents within city limits.

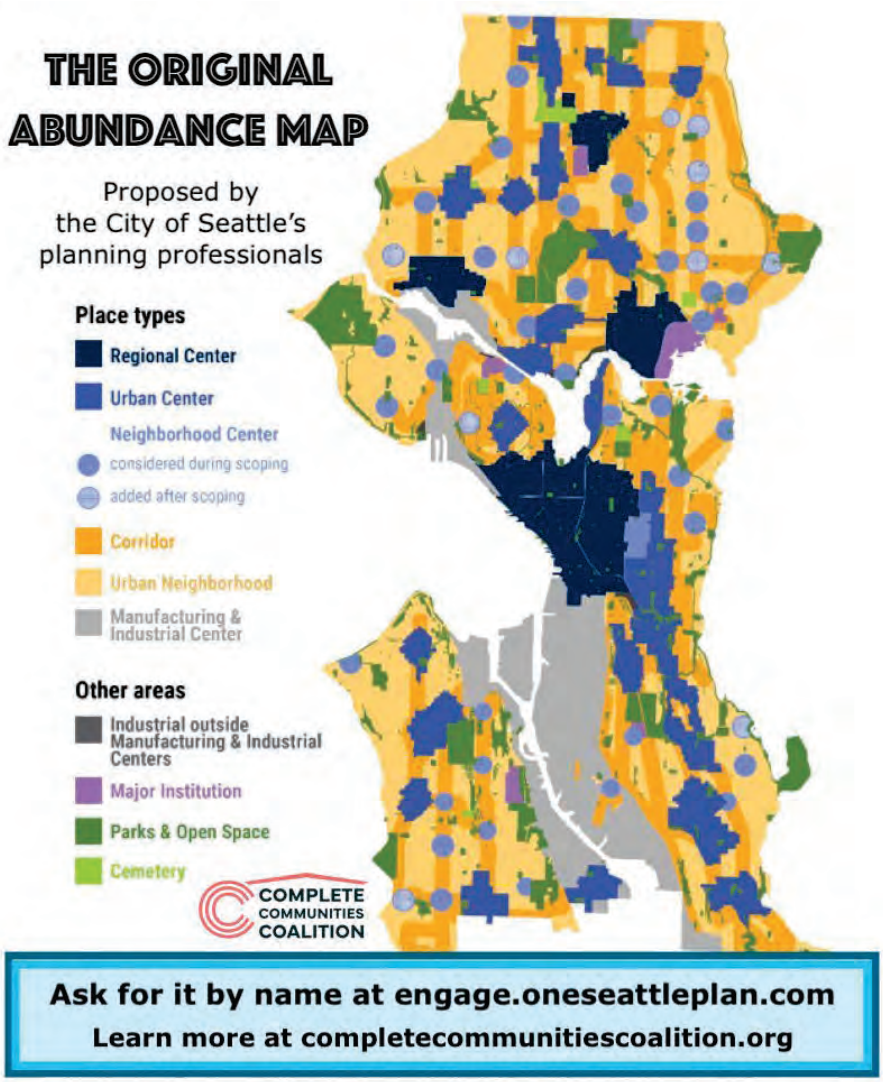
Letter 114

From: Scott Berkley
To: PCD_OneSeattleCompPlan; PCD_CompPlan_EIS
Subject: Comp Plan Comments
Date: Saturday, May 4, 2024 4:47:33 PM

CAUTION: External Email

Please make the following changes to the draft comp plan:

- Revert to the Original Abundance Map proposal (aka the OPCD draft proposal to the mayor's office) that included more Neighborhood Centers and wider corridors.
- Expand all Urban Centers and Regional Centers around current and future light rail and rapid ride stops and allow high rises within a 1/4 miles.
- Allow 12 story mass timber buildings anywhere in all Regional Centers and Urban Centers.
- Add urban centers near major parks such as Magnuson, Discovery, Seward, and Lincoln.
- Designate Mt Baker and West Seattle Junction as Regional Centers
- Specify at least 50 Neighborhood Centers and expand the radius to 1/4 mile. Specifically ensure that Alki, High Point, Seward Park, South Beacon Hill, Gas Works, North Magnolia, Roanoke Park (North Broadway), Nickerson (North Queen Anne), and Upper Fremont areas are designated as Neighborhood Centers.
- All areas within Neighborhood Centers should allow at least FAR of 2.5, with the majority of land allowing FAR of at least 3.0. 114-1
- Allow mid-rise residential and mixed-use buildings anywhere within 1/3 mile of frequent bus or rail service, as well as near schools and large parks. Do not limit additional development to directly along arterials.
- Increase the allowed FAR in Urban Neighborhoods to a base of 1.6 and allow 8-plexes by right. Allow additional 0.2 FAR and an extra story of height limit for stacked flats. Also grant an additional 0.2 FAR and an extra story of height limit for passivhaus buildings or if at least 2 Affordable units are included.
- Allow unlimited height, FAR, and unit count in buildings belonging to the Seattle Social Housing Developer. The allowed lot coverage should be no less than 80%. These should be allowed in any residential area of the city.
- Eliminate parking mandates throughout the city for all land uses.
- Study congestion pricing as a method of reducing VMT and ensuring the ample availability of right of way for use by transit, walking, and biking.
- Eliminate the MHA program throughout Seattle.
- Eliminate design review for all project types and replace it with ministerial review of very limited, objective design criteria.
- Study replacing Jackson golf course and West Seattle golf course with car-free eco-districts with high-rise mixed use buildings within a campus of large amounts of open space.



Demographics:
Male, White, 35-44, live and work in Seattle, 98126

Thank you,
Scott Berkley

114-1
cont

Letter 115

From: Jo Berliner
To: PCD_CompPlan_EIS; LEG_CouncilMembers
Subject: Comment on DEIS
Date: Sunday, May 5, 2024 1:43:20 PM

CAUTION: External Email

Please note my comment on the DEIS:

1: Section P 3-3 states that “none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild.” What is the impact of the plan specifically on Seattle’s plants and animals?

115-1

2: Section P 3-3 states that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." What analysis shows that tree planting programs, coupled with increased hardscape, will compensate for lost urban forest?

3: The plan states that Seattle will make progress toward its 30% canopy goal. The new tree ordinance substantially reduces private land available for trees. How much public land is available to reach the 30% goal? How many trees will need to be planted in these areas every year to make up for trees removed by development?

Sincerely,

Jo Berliner
Seattle resident (98115)

--
Jo Berliner
pronouns: he/they

Letter 116

From: Lynn Best
To: PCD_CompPlan_EIS
Cc: Moore, Cathy
Subject: Comments on the Comp Plan Draft EIS
Date: Monday, May 6, 2024 7:46:14 AM

CAUTION: External Email

Dear Planners, my husband and I are writing to comment on the Comp Plan Draft EIS. I started my career in City government at the Department of Community Development, then switched to Construction and Land Use when DCD was eliminated. I then spent over 30 years in the Environmental Division of Seattle City Light, becoming Director and Officer. I have strong training and experience in both city planning and environmental initiatives and protection. We are concerned with the basic assumption of this environmental analysis, that developmental impacts would be contained within the city if the urban natural environment is destroyed to allow more density. We strongly believe that the greater density being sought can be gained while preserving our tree canopy and with it, urban nature. The fallacy that greater density alone keeps prices low and protects nature outside the city has been shown to be shown false again and again. Just take a look at New York City, the densest city in this country. Not cheap and sprawl is not contained. 116-1

Trees provide many benefits to urban dwellers — cooling in hot weather, cleaning the air, fighting climate change, generally making a city more livable. The EIS (P 3-3) states that Seattle will continue to make progress toward its 30% canopy goal. How is this possible under the new tree ordinance that loosens tree protection combined with a new Comp Plan that promotes more density? If the answer is planting on public land, how much land is available for planting and how many trees would need to be planted annually? Section P 3-3 also states that: "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover?". How is this possible? How would the loss on private property be compensated for?

Finally, Section P 3-3 states that "none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild." It does not analyze the impact of the new Comp plan on the survival of Seattle's plants and wildlife. We believe that that analysis is required in the EIS.

Thank you for the opportunity to comment on this EIS.

Sincerely, Lynn and Malcolm Best

Sent from my iPhone

Letter 117

From: Neisha
To: PCD_CompPlan_EIS; LEG_CouncilMembers
Subject: Comment on DEIS
Date: Saturday, May 4, 2024 9:31:06 PM

CAUTION: External Email

Please note my comment on the DEIS:

This plan should be prioritizing urban forest retention , should protect mature trees, and should give developers serious consequences when they allow trees to be damaged. What makes Seattle a great place to live is it's walkable and beautiful neighborhoods. We are part of nature, not in opposition of it. Density and tree retention can both happen, they don't inherently prevent each other.

117-1

1: Section P 3-3 states that “none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild.” What is the impact of the plan specifically on Seattle’s plants and animals?

2: Section P 3-3 states that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." What analysis shows that tree planting programs, coupled with increased hardscape, will compensate for lost urban forest?

3: The plan states that Seattle will make progress toward its 30% canopy goal. The new tree ordinance substantially reduces private land available for trees. How much public land is available to reach the 30% goal? How many trees will need to be planted in these areas every year to make up for trees removed by development?

Sincerely, Eva Bhagwandin

Sent from my iPhone

Letter 118

From: eva Bhagwandin
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 9:13:58 AM

CAUTION: External Email

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities. 118-1

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

eva Bhagwandin
eva.neisha@gmail.com
515 Ne 86th St
Seattle, 98115

Letter 119

From: Khai Bhagwandin
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 1:49:36 PM

CAUTION: External Email

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

119-1

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Khai Bhagwandin
khaibhagwandin@gmail.com
515 NE 86TH ST
Seattle, Washington 98115

Letter 120

From: Samuel Bhagwandin
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 3:28:03 PM

CAUTION: External Email

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

120-1

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Samuel Bhagwandin
sgbhagwandin@hotmail.com
515 NE 86th Street
Seattle, Washington 98115

Letter 121

From: Ethan Bickel
To: PCD_CompPlan_EIS; LEG_CouncilMembers; Nelson, Sara; Hollingsworth, Joy
Subject: Comment on DEIS
Date: Sunday, May 5, 2024 5:22:34 PM

CAUTION: External Email

Please note my comment on the DEIS:

1: Section P 3-3 states that “none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild.” What is the impact of the plan specifically on Seattle’s plants and animals?

121-1

2: Section P 3-3 states that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." What analysis shows that tree planting programs, coupled with increased hardscape, will compensate for lost urban forest?

3: The plan states that Seattle will make progress toward its 30% canopy goal. The new tree ordinance substantially reduces private land available for trees. How much public land is available to reach the 30% goal? How many trees will need to be planted in these areas every year to make up for trees removed by development?

Sincerely,
Ethan Bickel
Seattle, WA 98112

From: Mary Bicknell
To: PCD_CompPlan_EIS
Cc: LEG_CouncilMembers
Subject: Tree ordinance
Date: Saturday, May 4, 2024 8:41:39 PM

CAUTION: External Email

Please pass legislation that encourages more trees for Seattle. It seems developers cut down beautiful mature trees, that could remain if a building was redesigned. Please encourage more setbacks for buildings from the street to make room for planting more trees. Please consider the need for open space and avoid streets with tall buildings with no room for trees between them. It seems the urge to build housing immediately has erased any thoughts of the consequences. I grew up in Chicago and remember the Projects built for low income renters. They had no trees and were certainly not attractive or even livable. 122-1

Please more trees.

Mary Bicknell

98105

Letter 123

From: Bonnie Bledsoe
To: PCD_CompPlan_EIS
Subject: Comments of draft EIS
Date: Sunday, May 5, 2024 9:55:01 PM

CAUTION: External Email

I have some concerns regarding the Evironmental Impact Statement and the One Seattle Comprehensive Plan:

P 3-3-29-30 Please analyze the potential impact of the 5 options on Seattle plants and animals. This is a Seattle EIS, not a regional or state EIS. Saying "unlikely to result in appreciable impacts on regional populations of plants or animals"' and "none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild" is avoiding commenting on the specific impacts on Seattle plants and animals. 123-1

- p 3-3-30 Saying that "none of the action alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." is not backed up by facts but speculative at best. The new tree protection ordinance increases the potential for tree removal and loss in several ways. One is that all the zones that can undergo development under the ordinance state that the newly defined "basic tree protection area cannot be modified" despite Portland, Oregon and the Northwest Society of Arboriculture saying it can be modified to save trees. This and current guaranteed lot coverage of 85 - 100% for multifamily lots and above and rezoning to occur in the Neighborhood Residential zone means more trees, especially large ones, will be removed. What is your estimation of potential canopy acreage loss (over 5 year periods consistent with the city's canopy studies) with increased development and density in each alternative?

- What is your estimation of tree planting needs and a time frame to replace the equivalent lost canopy area and volume (over 5 year periods as tracked by the city's canopy studies)?

- Is canopy area and volume replacement equivalence even possible with replanting since removed trees, if not removed, would have increased growing according to scientific articles?

  What is the acreage available and suitable for planting trees in each of the following public areas - the city's right of ways, Natural Areas, and Developed Parks?

- How many trees and what size will need to be planted in these areas every year to make up for trees and canopy removed during development on lots? How many trees and what size for all canopy loss?

123-1 cont

- What is the available acreage available to plant trees on private property?
- When will it be possible to reach the 30% citywide goal?
- What potential is there for more than 30% tree canopy in Seattle over time?
- Is up to 40% canopy coverage, over time, as proposed in the previous Comprehensive Plan possible?
- Canopy volume, especially of coniferous trees during our rainy season, are critical factors in reducing stormwater runoff. What is the projected loss in canopy volume over the next 20 years as big conifer trees are removed?
- What is the projected increase in stormwater runoff and what costs are associated with on site and alternative city water management policies of stormwater and pollutant runoff as a result?

As to commenting on other tree potential mitigation measures, please add:

- Amend the Tree Protection Ordinance to require developers to maximize the retention of existing trees 6" DSH and larger.
- Give SCCI Director the ability to ask for alternative site designs to save trees.
- Support building higher and building attached units to allow for tree retention and planting areas like Portland, Oregon has with 20% areas for multifamily and 40% for its 1-4 unit family zone.
- Amend Tree Protection Ordinance to require ordinance to apply to all city land use zones.
- Remove the "basic tree protection area" loophole in the Tree Protection Ordinance that allows developers to unnecessarily remove almost all large trees on lots.
- Require developers to submit a Tree Inventory and

Thank you, Bonnie Bledsoe

Letter 124

From: Bonnie Bledsoe
To: PCD_CompPlan_EIS
Subject: Fwd: Trees! Help!
Date: Tuesday, May 7, 2024 8:35:14 AM

CAUTION: External Email

Begin forwarded message:

From: Bonnie Bledsoe <bonnielynnseattle@gmail.com>
Subject: Trees! Help!
Date: May 4, 2024 at 7:18:51 AM PDT
To: PCD_CompPlan_EIS@seattle.gov

I'm very concerned about trees being protected here in Seattle. Chopping down mature trees with their nurturing ambiance and cooling overhangs cannot be replaced with saplings.

The environmental impact statements states in Section P 3-3 that "none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild." So my question is what is the impact on the plants and animals here?

In terms of lost urban forests, what will compensate for that? Section P 3-3 says that "none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild"…can you confirm this?

So Seattle in this new plan has a goal of 30% canopy…how much public land is available to reach this goal? Specifically how many trees will need to be planted, and where. (The new tree ordinance greatly reduces private land available for trees.)

Thank you for addressing my concerns,

Bonnie Bledsoe

124-1

Letter 125

From: June BlueSpruce
To: PCD_CompPlan_EIS
Cc: LEG_CouncilMembers
Subject: Comment on draft EIS for OneSeattle Plan
Date: Monday, May 6, 2024 3:11:38 PM

CAUTION: External Email

Dear OPCD staff,

I am responding to the five alternatives for increasing housing in Seattle that are presented in the OneSeattle Plan draft EIS. I encourage the OPCD to adopt Alternative 2, which would add 100,000 units of housing while having the least impact on tree canopy. My second choice would be Alternative 4. 125-1

Below are some questions I would like answered as you consider the environmental impact of the Plan:

- P 3-3-29-30 Please analyze the potential impact of the 5 options on Seattle plants and animals. This is a Seattle EIS, not a regional or state EIS. Saying "unlikely to result in appreciable impacts on regional populations of plants or animals"' and "none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild" is avoiding commenting on the specific impacts on Seattle plants and animals.

- p 3-3-30 Saying that "none of the action alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." is not backed up by facts but speculative at best. The new tree protection ordinance actually increases the potential for tree removal in several ways. One is that all the developmental areas covered by the ordinance state that the newly defined "basic tree protection area cannot be modified" despite Portland, Oregon and the Northwest Society of Arboriculture saying it can be modified to save trees. This and current lot coverage of 85 - 100% for multifamily lots and above and rezoning to occur means more trees, especially large ones, will be removed. What is your estimation of potential canopy acreage loss (over 5 year periods consistent with the city's canopy studies) with increased development density in each alternative?

- What is your estimation of planting needs and time frame to replace the lost canopy (over 5 year periods tracked by the city's canopy study)?

- Is canopy replacement equivalence even possible with replanting since removed trees, if not removed, would have continued growing, according to scientific articles?

- What is the acreage available and suitable for planting trees in each of the following public areas- the city's right of ways, Natural Areas and Developed Parks?

    - How many trees and what size will need to be planted in these areas every year to make up for trees and canopy removed during development on lots?
    - What is the available acreage available to plant trees on private property?
    - When will it be possible to reach the 30% citywide goal?
    - What potential is there for more than 30% tree canopy in Seattle over time?
    - Is up to 40% canopy coverage, over time, as proposed in the previous Comprehensive Plan possible?

- Canopy volume, especially of coniferous trees during our rainy season, are critical factors in reducing stormwater runoff. What is the projected loss in canopy volume over the next 20 years as big trees, including conifer trees are removed?

- What is the projected increase in stormwater runoff and what costs are associated with on site and alternative city water management policies of stormwater and pollutant runoff as a result?

Thank you for considering these questions.

Best,

June BlueSpruce
District 2
5008 44th Ave. S.
206-579-1203

125-1 cont

Letter 126

From: Robert Blumenthal
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 6:39:26 AM

CAUTION: External Email

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

126-1

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Robert Blumenthal
rblument@comcast.net
2812 NE 62nd St.
Seattle, Washington 98115

From: Scott Bonjukian
To: PCD_CompPlan_EIS
Subject: Comments on Comprehensive Plan EIS
Date: Monday, May 6, 2024 11:22:33 AM

CAUTION: External Email

Hi there,

My top comment is that housing policy is environmental policy; Housing policy is climate policy; Housing policy is transportation policy. If we want to reduce environmental impacts, we need to make it easier for people to live closer to where want to be and we need to make it easier for people to get to things without cars. **That all boils down to one thing: Allow more housing everywhere in Seattle.** 127-1

The housing target is much too small. Plan for at least 200,000 housing units so we can have enough new homes to keep up with job growth and meet and exceed historical housing production. If we overplan for housing, that's OK and does not hurt anybody. If underplan for housing, we continue the twin disasters we are currently experiencing with skyrocketing housing prices and people forced to commute long distances by car and increasing carbon emissions. Plan for as much housing as possible.

There are not enough Neighborhood Centers envisioned in the plan. Even existing Neighborhood Centers with commercial uses, like Alki and the east entry of Discovery Park, are now indicated in the future land use maps. Please bring back 100% of the Neighborhood Centers originally proposed by OPCD. These neighborhood centers also need to be much larger, with apartments legal to build within at least ¼ mile of the center. These neighborhood centers also need to allow neighborhood commercial uses on more than just corner lots and permit a variety of uses that people want to access for daily needs.

We need to allow multifamily housing close to all of our major parks, which would address multiple goals for creating more access to green space refuges amid climate change and improve access to big parks for people with lower incomes. Allow multifamily housing at least ½ mile from all of our top 20 largest parks, including Discovery, Magnuson, Gas Works, Lincoln, Seward, etc. At the same time, improve transit access to these areas by running more frequent service.

Regional Centers need to all be allowed to build high-rise buildings of 15 stories or more, in every corner of those centers. These are the most important hubs for living and working.

Similarly, Urban Centers need to all be allowed to build fully mid-rise buildings of up to 8 stories. Urban Centers should be designated along all of the frequent transit routes in the city, not just in discrete locations.

Middle housing should not have floor area ratio regulated, or if it is regulated, allow at least 1.6 FAR.

Thanks.

In addition, I have further comments on the proposal for Neighborhood Residential zones to the extent these details are studied in the EIS. Page numbers below refer to the separate Neighborhood Residential Zones Report.

127-2

I am personally looking to move into a larger family-sized home in the near future since my daughter was just born in January and we are planning a second child. If my family is going to stay in Seattle and contribute to our local economy and community life we need to find housing that fits our growing household. As it is, affordable three-bedroom condos and single-family homes are virtually non-existent. I'd love to live in a sixplex or stacked flat development with a small community of neighbors. Please give my growing family more affordable and appropriately-sized middle housing options throughout the city.

My top comment is to please follow the good and important guidance of the Department of Commerce Middle Housing Model Ordinance for Tier 1 cities, including these critical items:

- Allow all nine types of middle housing in all residential zones
- Do not count ADUs toward the required unit density
- Allow affordability and transit proximity bonuses to be combined (up to 8 units per lot)
- Do not regulate FAR for middle housing; or if FAR is regulated, use the Model Ordinance as a guide (e.g. up to 1.6 FAR)

I will start with a focus on FAR and permitted floor area. Page 12 of the report takes the wrong approach to comply with HB 1110, where it says "The proposal for updated Neighborhood Residential zoning would increase the number of units allowed on a lot to expand housing choices and comply with state law, *while generally maintaining the number of stories and amount of floor area allowed today*. The proposed development standards focus on increasing access to these neighborhoods by encouraging construction of more smaller homes that have comparatively lower prices."

Smaller homes that naturally have lower prices are good, but flexibility for development to also have larger attached and stacked family-sized units is critical to improving equity and affordability outcomes. Sometimes, roommates sharing a multi-bedroom home can find affordable outcomes. But most importantly, our Neighborhood Residential zones, which have been intended for families for over a century, must continue to open up to families with

children and multiple generations living under one roof. In most cases, family-friendly housing requires two, three, and four or more bedrooms in a dwelling unit. The floor area allowed today and proposed here is inconsistent with state law and does meet all of the goals and values expressed by this very report. Family-sized units are needed to meet the goals for creating more complete neighborhoods and addressing harms from exclusionary zoning.

127-2 cont

Family-sized units are usually at least 1,000-1,500 square feet. Floor area ratio standards should either be removed or adjusted to allow this in a variety of middle housing configurations, from townhouses to stacked flats. Using the Department of Commerce Middle Housing Model Ordinance as a guide would be the quickest and easiest path to allowing family-sized units. Either: adopt the Model Ordinance numbers (progressively up to 1.6 FAR) and make sure garages and other non-occupied space are not counted in floor area limits; or preferably do not regulate FAR at all in Neighborhood Residential zones, instead relying the other existing zoning standards like lot coverage, setbacks, height, and parking and tree requirements to control building size. Note that not every middle housing developer will seek to maximize the size of buildings since there is a market demand for a variety of home sizes.

Comments on other specific dimensional standards:

- Is it specifically concerning that table on page 12 also does not acknowledge larger buildings than four units. I am led to believe that five- and six-unit buildings will also be limited to 0.9 FAR, which is much too small to allow family-sized units.
- The 20% open space requirement seems quite high for small lots. It must be clarified that open space on all types of yards, porches, balconies, and rooftops can help meet this requirement. Only counting ground-level open space would negatively limit design options and housing supply.
- The 50 percent lot coverage proposal is good.
- The setback requirements seem workable on typical lots.
- Maximum building height should be more specifically defined than "three stories" for market-rate developments. There is mention of 32 feet on page 27. A minimum allowed height of 35 feet is much more common in Washington state's residential neighborhoods, and 35 feet is helpful to allow a variety of configurations for pitched roofs, accommodate sloped sites, and allow tall ceilings that make homes feel spacious and create space for modern mechanical systems.

On density, please make it clear the Seattle will follow Department of Commerce guidance to allow at least eight units per lot when a development is both near major transit and includes affordable housing. I also do not see any mention of how ADUs are integrated in the unit-per-lot standards; ADUs are not middle housing under HB 1110 and should not be counted as a unit for the purposes of density compliance.

Also, nowhere in the report is a proposal for how to comply with the HB 1110 requirement

that at least six of nine listed middle housing types must be allowed. The graphics on pages 13-19 focus too much on expensive detached units and at most mention duplexes and triplexes. What are the minimum four other types going to be? To duplexes and triplexes I would add fourplexes, fiveplexes, sixplexes, and stacked flats. Townhouses are good but they challenging for some families and people with disabilities, and stairways eat up a lot of floor area in each unit. Ultimately, I strongly urge allowing all nine types in all Neighborhood Residential zones.

127-2 cont

The proposal on page 21 for less housing allowed in high-risk displacement areas seems to not comply with HB 1110, specifically RCW 36.70A.635(4)(b)(i) which only allows extensions of implementation timelines for areas of risk of displacement. The City cannot be granted a permanent exemption but only a temporary extension until the city creates a plan for implementing anti-displacement policies by the next implementation progress report required by RCW 36.70A.130(9), per RCW 36.70A.637. It also appears some of the mapped areas violate RCW 36.70A.635(4)(c) which prohibits this approach in areas with historic racial covenants and near major transit stops such as the Rainier Valley, Delridge, and Northgate with light rail and bus rapid transit and multiple areas with trolley bus routes which are also major transit.

The affordable housing standards proposed on page 22 seem to be a move in the right direction. However, as noted above, even market-rate housing is deserving of more flexible floor area standards.

I appreciate the effort to return small neighborhood commercial development to neighborhoods on page 24. However, the approach is too small. Neighborhood businesses should not be literally limited to corner lots, of which there is a finite amount. There are plenty of examples of successful and compatible neighborhood stores located midblock. Upper floors should not have any different setback from the ground floor because this creates construction costs increases and makes many existing residential buildings non-conforming and unable to be converted to commercial use.

I applaud the consideration of removing off-street parking requirements on page 26. The report points out that current parking requirements under local and state law are quite low already. Doing away with parking requirements entirely in Neighborhood Residential zones - and perhaps even citywide - would greatly simplify regulations and make it easier to build housing. As pointed out in the report, the market may still choose to build parking because is a popular amenity, but at least local regulations would be streamlined and easier to work with.

Best,

Scott Bonjukian
3213 Harbor Avenue SW

From: dougb@nwrain.com
To: PCD_CompPlan_EIS
Subject: One Seattle Comprehensive Plan does not go far enough
Date: Thursday, April 4, 2024 4:47:22 PM

CAUTION: External Email

Seattle needs to have a bold housing plan to create a vibrant livable 15 minute city with abundant housing. I do not feel that the current plan will create the types of housing Seattle needs to handle future growth. 128-1

I support the below improvements to the One Seattle plan:

1. Allow bigger buildings in more places to break out of the "Urban Village" strategy.
2. Add more "Neighborhood Centers" to anchor small neighborhood business districts with housing.
3. Zone for fourplexes and sixplexes that will actually get built and support families with three- and four-bedroom homes.
4. Embrace transit-oriented development and allow larger apartment and condo buildings near all frequent transit corridors
5 Remove parking requirements.
6 Corner stores should not only be on corners.

Seattle needs be a leader in urbanization if we wish to be a thriving city that people want to live in. Seattle also needs to embrace and take full advantage of the new Washington State housing legislation and not attempt to diminish or sidestep them.

I encourage you to upgrade the plan to create more housing through implementing the above improvements. This is key to the cities future prosperity, especially as Seattle will be in competition with other cities that may work to develop better housing plans.

Thank you,

Doug Booze
West Seattle resident

DEIS StoryMap Comment

Name: Nora Bos

Email: bookcrush@gmail.com

Date: 5/6/2024

Comment:

Hello,
Thank you for making this proposal available to residents of Seattle. I am concerned this proposal does not do enough to maintain and regulate existing mature tree coverage in Seattle. 129-1

As the city's own 2021 report revealed, the city has lost 1.7% of its tree cover in between 2016 and 2021. This loss of tree coverage is not slowing down, and I see the impact of the lack of regulation by the SDCI and City of Seattle. At this rate, Seattle should change its name to De-Emerald City, because the city and city planners allow mature trees to be clear cut in the name of "unaffordable housing". Simply leveraging a "fee" or tax on these developers does nothing to maintain the mature tree growth. shade, and wildlife habitat.

As follow up questions to this plan -
What is the impact of the plan on Seattle's plants and animals?
What analysis shows that tree planting programs will compensate for the loss of urban forests? It is obvious that new plantings do not provide the same level of shade, habitat, green spaces as the mature trees that are being cut down.
How many acres of public land are available to reach the 30% goal of tree coverage? How many trees - not saplings, not skinny little baby growth trees, will need to be planted to achieve 30% tree coverage?

I hope the city and city planners will reverse course on current state of allowing developers to clear cut lots. Our neighborhoods need trees for shade and for wildlife. We see the increased summer temperatures in Seattle, and clear cutting mature trees is harming our environment and citizens in this new era of hot summers and environmental change.

Thank you,
Nora Bos

Letter 130

From: Patrick Brady
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 12:09:04 PM

CAUTION: External Email

Comments Planning and Community Development EIS,

Affordable housing and maintaining our city's forested identity does NOT need to be an either/or scenario. We can prioritize upward growth, while strongly protecting our canopy that will be critical for the literal health of the city. 130-1

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Patrick Brady
pcmbrady@gmail.com
318 29th Ave E
Seattle, Washington 98112

Letter 131

From:	Patti Brandt
To:	Woo, Tanya; Maritaza.Rivera@seattle.gov
Cc:	PCD_CompPlan_EIS
Subject:	CITY WIDE PLAN & TREES
Date:	Sunday, May 5, 2024 1:03:05 PM

CAUTION: External Email

Hello,

In the city-wide plan that decides how Seattle develops over the next decade, the following is not clear and thus, a concern. 131-1

Here are a few major questions:
H*ow much public land is available to reach the 30% goal? How many trees will need to be planted in these areas every year to make up for trees removed by development?*

What is the impact of the plan specifically on Seattle's plants and animals?

What analysis shows that tree planting programs, coupled with increased hardscape, will compensate for lost urban forest? Patti

Letter 132

From: Brooke Brod
To: PCD_CompPlan_EIS
Subject: Seattle Comp Plan DEIS Comments
Date: Sunday, May 5, 2024 8:59:41 PM

CAUTION: External Email

To Whom it May Concern:

Thank you for this opportunity to provide comment on the Draft Environmental Impact Statement for the Periodic Update to the Comprehensive Plan. Seattle is at an important inflection point and this process is a critical opportunity to set a course for a city that provides room for people of all backgrounds.

In looking at the various documents and analyses that were developed for this planning process I paid the most attention to the Draft One Seattle Plan Housing Appendix. Housing, namely the lack of housing choice and housing affordability, is by far the most critical issue facing the city. It is an issue that touches my family personally; my stepfather has been unable to find affordable senior housing for years despite being on various waitlists and jumping through overly complex hoops. I am lucky enough to be able to provide him with space in my home and recognize that this is due largely to my privileged status as someone who owns their home. 132-1

The Draft One Seattle Plan Housing Appendix, notes that the city will need to add a net 112,000 housing units over the next twenty years. 63% of those units (70,726) will need to be affordable to people making 80% or less of area median income. So imagine my dismay at seeing that only one alternative in the DEIS proposes to add capacity above the stated need - alternative 5, which proposes adding 120,000 units over the twenty years. In this most "ambitious" alternative, 60% of the housing units added would have to be affordable. Alternative 5 doesn't even come close to this number, adding only 18,541 units, which meets only 26% of the stated need.

The Draft One Seattle Plan Housing Appendix notes that over the past 5-10 years the number of low- to middle-income households and number of households with children has been dramatically declining. For the health of our economy, addressing the crisis of people experiencing homelessness, preventing school closures and reduced programming, and stated goals around livability and equity, Seattle must do better than the current proposals.

Ultimately it will be private and non-profit developers who will create the vast majority of affordable housing that is needed. Whether that is through following MHA guidelines, taking advantage of MFTE or building on surplus land that has been donated. Those developers need the maximum amount of flexibility to build a wide variety of housing types in order to

meet the needs of all types of households. We will be unable to meet those needs without dramatically more housing capacity than is currently being proposed in any of the alternatives.

132-1 cont

I would like to make the following suggestions and requests for further analysis in the FEIS.

- I think it is vital to increase the number of existing and proposed Neighborhood Centers and to increase the boundary/walkshed of these designated areas on the Future Land Use Map beyond the 3 minute and 800 feet designation currently outlined in the draft Comprehensive Plan to at least a .25 mile walkshed. As currently designated these centers would do very little to contribute to overall creating complete communities where more people can walk, bike, or roll to meet their basic needs. The neighborhood centers concept needs to be strengthened and expanded.
- In the FEIS, I would ask you to analyze the potential for additional housing capacity in both a .25 mile walkshed scenario and .5 mile walkshed scenario.
- I would like to see further analyses in the FEIS about which alternative would lead to creation of the most family-sized (2 or more bedroom) units.
- I would like to see further analyses in the FEIS about which alternative would lead to the most displacement of low and middle income (less than 30% AMI and less than 50% AMI) households.
- I would request further analysis in the FEIS on the impacts of proposed height limits in Neighborhood Residential and Urban Neighborhoods to unit production, unit size, and feasibility for developers to take advantage of MHA and MFTE.

132-2

I have lived in my neighborhood - Roosevelt/Ravenna - off and on for over thirty years. I went to high school in this neighborhood, lived in an apartment in my post-college years, and now own a house. I have witnessed first hand the changes brought about by new investments in light rail and upzones. These changes have been overwhelmingly positive. My neighborhood is more racially and socio-economically diverse, there are more amenities, and small businesses are thriving. These kinds of changes should be spread across the city, but can only happen if we add more housing capacity throughout the city.

132-3

This is a change that is both necessary and is one that we should embrace with enthusiasm for the benefits it will bring.

Thank you for your consideration.

--
Brooke Brod
(646) 418-5092
brooke.brod@gmail.com
https://www.linkedin.com/in/brooke-brod/

Letter 133

From: Barbara Broderick
To: PCD_CompPlan_EIS
Cc: Rivera, Maritza
Subject: questions regarding the Environmental Impact Statement
Date: Sunday, May 5, 2024 11:49:12 AM

CAUTION: External Email

Dear PCD CompPlan EIS:

- I am concerned about the welfare of urban landscapes and wildlife in section P 3-3. It states "none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild". This is vague and needs to be clear about the impact on wildlife and plant landscapes in this plan. 133-1
- What is the data and/or analysis that shows any tree planting programs will be effective in replacing lost urban forest landscapes? Increased hardscapes (sidewalks, driveways, etc.) rob the landscape of green spaces/tree cover. Section P 3-3 vaguely states, "none of the alternatives would be expected to have significant unavoidable adverse impacts on tree canopy cover."
- The CompPlan's statement that 30% urban tree canopy can be accomplished. How is that possible when the current urban tree ordinance reduces private land available for trees? How much public land is actually available to reach this 30% goal? Trees removed for development need to have new trees planted . . . . how many trees are needed to be planted yearly to accommodate the trees lost in development?

Thank you for your consideration.

Barbara Broderick
3911 NE 82nd St.
Seattle, WA 98115

Letter 134

From: Betty Brooking
To: PCD_CompPlan_EIS; Morales, Tammy; Woo, Tanya
Subject: Environment Impact
Date: Monday, May 6, 2024 12:20:55 PM

CAUTION: External Email

Dear Planners and Council Members,

The Environmental Impact of the Comprehensive Plans does not seem to address the issue of trees and plants. How can an environmental statement not consider these vital environmental issues? That's one question, plus I have a few more. 134-1

Section P 3-3 is very concerning to say the least. Is it true that none of the alternatives would have a more favorable impact on the tree canopy, or other plant or animal species, as is written in this section? Really?

If the plan states that Seattle will continue working toward its goal of 30% canopy, is there enough public land out there to reach this goal, since the new tree ordinance reduced private land available for tree planting? Also, what is your calculation about the number of trees that will need to be planted yearly due to tree removal to make way for development?

I would appreciate your response to these questions.
Regards,
Betty Brooking
1738 S Dawson St
Seattle, WA 98108

DEIS StoryMap Comment

Name: Amy Broska

Email: broskaamy@gmail.com

Date: 4/17/2024

Comment:

As the largest city in the Puget Sound Region we have a duty to meet the outlines in the Puget Sound Regional Council VISION 2050. To meet these goals we need to seriously consider the previously discussed Alternative 5 Growth Plan with higher growth targets. Seattle's Comprehensive Plan should accommodate for the housing crisis that affects all residents in Washington State. Specifically, the city should be researching granting tax breaks and fee deferrals to housing projects that include affordable units to help make the housing we so desperately need easier to build. 135-1

I hope to see the city further study the effects of what will happen if we do not meet the required amount of housing built by 2050. We deserve to have a city that can fit all of us in it.

Letter 136

From: Ellen Braun-Kelly
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 9:05:20 AM

CAUTION: External Email

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

136-1

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Ellen Braun-Kelly
embkelly@comcast.net
10623 Exeter Ave NE
Seattle, Washington 98125

Letter 137

From: Ellen Braun-Kelly
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 8:47:41 AM

CAUTION: External Email

Comments Planning and Community Development EIS,

Seattle is no longer green. Mass building of homes with little attention paid to the environment is endangering everything that makes Seattle beautiful. As I look at an enormous Douglas fir across the street, which is the home of eagles, and numerous other bird species, I know it, too will probably be hacked down, as the house is for sale, and every house that is old in my neighborhood gets mowed down, along with trees, shrubs and topsoil that has been here for hundreds of years. Instead 3 or more homes will be built on the lot, disregarding any of the natural environment. The houses are built so close to each other, that not even native trees or shrubs will sustain any birds, as there will be no room. For instance, native chickadees require 6000 bugs from native plants per day when they feed their young.
Developers are the only people making money on these homes. They are NOT helping the housing shortage problem, because in my neighborhood, they sell for prices only wealthy people can afford. What is even worse is their plans are being approved, and in the plans, the trees are shown. However, they get removed anyway, saying they are endangering the buildings, and don't get re-reviewed. This is not a solution. Seattle is shooting itself in the foot, as the loss of wildlife and greenery will drastically change the environment.
Thank you for listening.
Ellen Braun-Kelly

137-1

Ellen Braun-Kelly
embkelly@comcast.net
10623 Exeter Ave NE
Seattle , Washington 98125

Letter 138

From: Beth Brunton
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 11:50:01 AM

CAUTION: External Email

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

138-1

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Beth Brunton
bebrunton@hotmail.com
1900 28th ave s
Seattle, Washington 98144

Letter 139

From: Barb Burrill
To: PCD_CompPlan_EIS
Cc: Rivera, Maritza
Subject: 3 questions regarding the EIS
Date: Sunday, May 5, 2024 10:28:37 AM

CAUTION: External Email

Hello -

I have some questions about the Environmental Impact Statement in the draft Comprehensive Plan. 139-1

1) How can it be proven that tree planting plans make up for the loss of mature urban trees?

2) How much public land is available to help us reach the 30% tree canopy goal if private developments are allowed to remove trees. How many trees on that public land can be planted? And again, planting new trees does not make up for removing mature trees, particular conifers.

3) What exactly is the impact on wild animal or plant species? Of course, removing mature trees also removes habitats for animals that live in those trees. How will this impact be quantified?

I volunteer several hours each week to take care of and improve public spaces in a local city park. I hope that city officials will be as mindful of the importance of these green spaces as are these many citizen volunteers who live in Seattle.

Barb Burrill
Wallingford

Letter 140

From: Cedar Bushue
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 4:07:32 PM

CAUTION: External Email

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

140-1

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

As it stands, South Park in particular needs a net of 6k trees planted and maintained in the next 10 years, to avoid the worst effects of climate change. But trees are regularly cut down by developers, due to lack of any meaningful regulation geared towards environmental justice areas. Thus resulting in less canopy, hotter areas, and more trees that must be planted and maintained to meet the canopy goal for South Park.

Thank you for your consideration.

Cedar Bushue
cedar.bushue92@gmail.com
1206 South Southern Street
SEATTLE, Washington 98108

Letter 141

From: Michael Byrd
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Tuesday, May 7, 2024 7:47:01 AM

CAUTION: External Email

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities. 141-1

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Michael Byrd
byrd4646@msn.com
414 Malden ave E, E
Seattle, Washington 98112

Letter 142

From: nc
To: PCD_OneSeattleCompPlan; PCD_CompPlan_EIS; LEG_CouncilMembers
Subject: Seattle City Plan - we need green space and mature trees!!
Date: Monday, May 20, 2024 3:50:59 PM

CAUTION: External Email

Hello:

Have lived in Seattle for over 30 years and one of the biggest reasons I loved it was because of all the conifer trees, the green and the fresh air... neighborhoods with trees, plants, birds, wildlife.

142-1

No one calls Seattle the Emerald City any more. I hope it doesn't continue to lose green canopy, green spaces and become just more crowded, hotter and more like Manhattan, but it sure seems to be heading that direction.

None of the city comp plan versions seem even to consider nature, the value of trees, especially mature trees, protecting existing green spaces or creating more green spaces which are absolutely essential to the quality of life of Seattleites.

Trees and dense housing are not mutually exclusive! Please get creative! Lost mature trees and their benefits to the air, to water dispersal, to sequestering CO2, to benefit the wildlife and to benefit mental health are lost forever.

Please consider helping to keep Seattle green and Emerald... how amazing that would be to preserve what we already have instead of squandering irreplaceable trees and green space to create a concrete human-made infrastructural desert and how amazing it would be to go forward with creating more green space alongside with all the inevitable infrastructural growth.

Please work to keep Seattle green!!

Thanks for reading,

Nancy C.

From: willieopal@protonmail.com
To: PCD_OneSeattleCompPlan; PCD_CompPlan_EIS; Hollingsworth, Joy; Woo, Tanya; Nelson, Sara
Subject: Trees are important to Seattle!
Date: Friday, May 3, 2024 6:19:59 PM

CAUTION: External Email

I am writing to comment on the first draft of Seattle's comprehensive plan. It is very important to choose an alternative that will protect Seattle's trees in this critical time of climate change and the growth of our city. Trees give us so much – they make the city cooler, they clean the air, they provide oxygen, they improve our mental health, add beauty, and, importantly, humans are not the only residents of Seattle. Trees are home to wildlife, which also deserves a place to live and adds so much to human life, too. I am a beginning birder and I am learning how important habitat is for our city's birds and other animals. 143-1

Of the five proposed alternatives, I am asking you to choose alternative 2 or 4 so that we can preserve the most trees in our urban environment as we continue to add density to our city.

It is a much better idea to keep the trees we have than to cut them down and then plant new trees. What is the evidence that planting new trees in areas that have been developed and paved will make up for the existing tree canopy and forest that we will lose?

How will the new comprehensive plan affect the natural world— flora and fauna—of Seattle?

How many trees will need to be planted every year to compensate the loss of trees due to growth and development? How will we reach the goal of 30% tree canopy, and how much public land will be available for this goal?

We need urban nature. **Choosing density at the cost of nature is short-sighted and the loss of nature will be very hard to recover and have detrimental impacts that would be much better avoided to begin with.**

Sincerely,

Amy Candiotti

1415 E. Union #1

Seattle, WA 98122

Sent with Proton Mail secure email.

Letter 144

From: Patricia Cannon
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Tuesday, May 7, 2024 8:52:59 AM

CAUTION: External Email

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities. 144-1

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Patricia Cannon
pattycannon@gmail.com
8160 21st Ave NE
Seattle, Washington 98115

From: A C
To: PCD_CompPlan_EIS
Subject: Bring back alternative comprehensive plan 5!
Date: Sunday, May 5, 2024 1:00:59 AM

CAUTION: External Email

I'll keep this short. We need more housing, a lot more of it, all over the city. It makes absolutely zero sense to not do that. There is no sound, logical reason to not allow much more housing, and much more density, in the city. People are not going to randomly decide to stop moving here as much as we might wish that.

145-1

Single family zoning is a relic of a bygone era where naive people thought highways, cars, and suburban sprawl were the future. Now we've seen the countless problems that that mindset has brought, and we know better.

We need more than just a few "urban villages." Seattle isn't a quiet suburb in the middle of nowhere. It's a major metropolitan city with an exploding population that shows no signs of slowing down. It's ridiculous to not allow at least mid size apartment buildings literally everywhere in the city.

Basically, the alternative comprehensive 5 is the MINIMUM we should be considering. I'd welcome something even bolder, but I think it's a decent compromise and we shouldn't even be considering the mayor's anemic housing proposal. Most everyone in the city today wants to see a lot more housing built. Attitudes have changed a lot in the last decade and the mayor seems to have missed it.

All the city needs to do is stop standing in the way of housing.

Signed,
Derrick (Alex) Cantrell
Pinehurst resident

From: Erica Carre
To: PCD_CompPlan_EIS
Subject: Re: Seattle Comp Plan/130th Station Rezone
Date: Monday, May 6, 2024 4:52:54 PM

CAUTION: External Email

To whom it may concern,

I would like to state that I am against urban village and only lukewarm to the idea of neighborhood anchors. 146-1

I purposely bought a home in a neighborhood that offered front and backyards and single family homes. I chose Northgate because it was one of the few that had not been destroyed by rezoning. The rezone you are considering will take away yards and privacy and build 80ft complexes right up against property lines. It's atrocious and unwelcoming to the property owners who already live here.

What you may consider progress and growth, I and many others consider problematic, disruptive and destructive to our livelihoods.I do not want my neighborhood rezoned in any form that would potentially allow a massive apt complex or otherwise to be built towering above my house and yard. Simple as that

Thank you.

Very concerned homeowner,

Erica Carre

From: Erica Carre
To: PCD_CompPlan_EIS
Subject: Seattle Comp Plan/130th Station Rezone
Date: Monday, May 6, 2024 12:18:29 PM

CAUTION: External Email

146-1 cont

I do not want my neighborhood rezoned in any form that would potentially allow a massive apt complex or otherwise to be built towering above my house and yard. Simple as that. Thank you.
Very concerned homeowner,
Erica Carre

Letter 147

From: Mal Carter
To: PCD_CompPlan_EIS; LEG_CouncilMembers
Subject: Comment on DEIS
Date: Saturday, May 4, 2024 10:29:05 PM

CAUTION: External Email

To whom it may conern,

Please note my comment on the DEIS:

147-1

1: Section P 3-3 states that “none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild.” What is the impact of the plan specifically on Seattle’s plants and animals?

2: Section P 3-3 states that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." What analysis shows that tree planting programs, coupled with increased hardscape, will compensate for lost urban forest?

3: The plan states that Seattle will make progress toward its 30% canopy goal. The new tree ordinance substantially reduces private land available for trees. How much public land is available to reach the 30% goal? How many trees will need to be planted in these areas every year to make up for trees removed by development?

Sincerely,

Mal Carter, community member

Letter 148

From: Jovi Catena
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 8:45:55 AM

CAUTION: External Email

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

148-1

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Jovi Catena
jovicatena1@gmail.com
8507 s. 115th st
Seattle, Washington 98178

Letter 149

From: Christine Cave
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 6:01:54 AM

CAUTION: External Email

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities. 149-1

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Christine Cave
cmcave@aol.com
735 N 72nd
Seattle, Washington 98103

Letter 150

From: Meg Chadsey
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 13, 2024 8:18:55 AM

CAUTION: External Email

Comments Planning and Community Development EIS,

[Resubmitting because first version sent prematurely]
The Draft EIS must be amended to protect and enhance Seattle's tree canopy. This is important to all Seattle residents because trees are one of the most cost-effective (not to mention beautiful) ways to reduce heat, flooding, and air pollution that is getting worse every year. Tree's improve health, especially in low income communities, and make the city someplace people actually want to live. Other Northwest cities like Portland recognize this and have enacted measures to protect urban trees, but in Seattle, I watch one tree after another get cut down and replaced by concrete or by spindly street trees destined to die in the first year. We need to take a systems approach and understand that trees are one significant puzzle piece that defines our future. Continuing to take a siloed approach to trees and many other topics will likely cost Seattle billions of dollars over the coming years and result in an unlivable city. It does not need to be this way!! 150-1

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Meg Chadsey
mschadsey@gmail.com
3629 Bagley Ave N
Seattle, Washington 98103

Letter 151

From: Meg Chadsey
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 13, 2024 8:11:16 AM

CAUTION: External Email

Comments Planning and Community Development EIS,

The Draft EIS must protect and enhance Seattle's tree canopy. This is important to all Seattle residents because trees are one of the most cost-effective (not to mention beautiful) way to reduce heat, flooding, and air pollution that is getting worse every year. Tree's improve health, especially in low income communities, and make the city someplace people actually want to live. Other Northwest cities like Portland recognize the value of mature urban trees, and have enacted measures to protect them around the country demonstrate the trees are one of the most cost effective climate measures and begin to rebuild what they have lost. 151-1

Yet, in Seattle, I watch one tree after another get cut down and replaced by concrete or by spindly street trees destined to die in the first year. We need to take a systems approach and understand that trees are one significant puzzle piece that defines our future. Continuing to take a siloed approach to trees and many other topics will likely cost Seattle billions of dollars over the coming years and result in an unlivable city. It does not need to be this way!!

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Meg Chadsey
mschadsey@gmail.com
3629 Bagley Ave N
Seattle, Washington 98103

Letter 152

From: mtl2bk@gmail.com
To: PCD_CompPlan_EIS
Subject: Seattle Comprehensive Plan Comment
Date: Wednesday, April 17, 2024 8:33:35 AM

CAUTION: External Email

Good morning,

I live in Columbia City with my wife and two kids.
I have read both the state bill HB 1110 and Seattle comprehensive plan. I have to say the state bill is fairly straightforward and easy to comprehend. I was left knowing exactly what the changes would be. 152-1

Seattle plan is extremely wordy, full of vague details and extremely hard to digest. The maps are not detailed enough and add to the confusion. I was left wondering actually what were the proposed zoning changes and what type of housing will be allowed on what types of lots.

My recommendation is to follow the state bill and abandoned the comprehensive plan. Our state already spent time and money on this. Let's use the money we would save by adopting the state bill and put it towards affordable housing.

Wishing for more practical thinking!
Kind regards,
Marc Charbonneau

Letter 153

From: Marcos Chavez
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 9:24:45 AM

CAUTION: External Email

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

153-1

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Marcos Chavez
marcoschavez43@gmail.com
818 NE 106th St, Apt 211
Seattle, Washington 98125

DEIS StoryMap Comment

Name: Ivan Chernyshev

Email: ivan.a.chernyshev@gmail.com

Date: 4/10/2024

Comment:

I am a renter in Wallingford, and I believe that the City of Seattle did not listen to the overwhelming majority's call for an Alternative 6 vision, which would lower the cost of housing across the city. Instead the current draft plan will increase already unaffordable housing costs. To create a more equitable, sustainable, affordable city, the plan should allow much more housing to be built away from noisy, polluted arterials. 154-1

If the City of Seattle adopted my above proposed changes, then we would be able to create a more affordable city for everyone.

Letter 155

From: Wendy Church
To: PCD_CompPlan_EIS; Morales, Tammy
Subject: EIS, questions
Date: Friday, May 3, 2024 8:21:49 AM

CAUTION: External Email

1. Section P 3-3 states that “none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild.” **What is the impact of the plan specifically on Seattle’s plants and animals?** 155-1

2. Section P 3-3 states that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." **What analysis shows that tree planting programs, coupled with increased hardscape, will compensate for lost urban forest?**

3. The plan states that Seattle will make progress toward its 30% canopy goal. The new tree ordinance substantially reduces private land available for trees. **How much public land is available to reach the 30% goal? How many trees will need to be planted in these areas every year to make up for trees removed by development?**

***

Wendy Church, PhD
wendyschurch.com
@wendychurchwriter

From: Robert Clabough
To: PCD_CompPlan_EIS
Subject: Comp Plan Comments
Date: Thursday, May 16, 2024 9:04:48 PM

CAUTION: External Email

Hello, my name is Robert Clabough.

I wanted to leave a comment on the Seattle plan, in favor specifically of more transit and further upzoning. 156-1

Seattle has had a housing crisis for a very long time, longer than I've lived here. In the short 10 years I've lived in the area housing has only become more expensive and less available. While I myself am fortunate enough to have purchased, there are many many more who are finding it near impossible to purchase, or even rent around Seattle.

The solution is obvious - more housing. To accomplish this we need to rethink the outdated zoning laws of the 1950s and 60s and start thinking about density across the city. More apartment buildings sure, but specifically middle housing. We are missing the middle zoning in this city, the places in between single family homes and large apartment buildings. Allowing smaller row-style housing and townhouses in what were previously less dense areas would lessen the crisis, allowing people to both purchase property and more easily rent.

Mixed use housing is also a benefit, I would encourage more looking into mixed commercial and residential. Allowing buildings with commercial on the ground floor with residential above is great for communities. Look at Woodinville and their new Schoolhouse district, it's the busiest area of town. People can now live and shop in the same place, even work there, all within walking distance.

These ideas would make Seattle more accessible and more available to people. Staying with single family housing is expensive and wasteful during this crisis. We should be celebrating that so many people want to live in our great city, not trying to "gatekeep" our city and push others out.

One final note, this is all accomplishable with transit. I'm glad to see the plan allows for extra dense zoning around transit. While we also have a housing crisis we also have a car crisis, and the only way to fix that is to reduce how many cars are on the road. I envision a future where Seattle would allow you to live without requiring a car. We aren't there yet, but I do hope that with proper planning we can become a city where you could walk outside and grab a bus or train to anywhere else in the city.

Thank you for taking the time to read this, and am happy to offer any clarification if needed.

Robert Clabough

From: Lisa Clark
To: LEG_CouncilMembers; PCD_CompPlan_EIS
Subject: Tree protection with density
Date: Saturday, May 4, 2024 7:10:49 AM

CAUTION: External Email

I would like to address the comprehensive plan so we can build 100,000 new homes while preserving our trees. Two beautiful, healthy cedar trees we removed across from my house, and these should have been protected though the current tree protection plans. It just seems that little is being done for protection of our city's treasures. 157-1

In Section P 3-3, it states that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." Where is the study that was done to prove that that tree planting programs and increased hardscape will be able to compensate for all of the trees that will be lost

From what I understand from the plan, it states that Seattle will make progress toward its 30% canopy goal. However, new tree ordinance substantially reduces private land available for trees. How much public land, and where is this land, that will be needed to reach this goal? How many trees, and what kind of trees need to be planted on public land to compensate for all the trees that are going to be removed through development?

Thank for your attention to this matter,

Lisa Clark

Letter 158

From: Lisa Clark
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 6:30:32 AM

CAUTION: External Email

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

158-1

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Lisa Clark
lisaclarklisaclark@gmail.com
PO Box 23286
Seattle, Washington 98102

Letter 159

From: Dave Clark
To: PCD_CompPlan_EIS
Cc: Rivera, Maritza
Subject: FW: Comments on Seattle Comp Plan EIS
Date: Monday, May 6, 2024 2:15:23 PM

CAUTION: External Email

Mr. Holmes,

I inadvertently sent the email below to the wrong address. Hopefully I got it right this time.

159-1

From: Dave Clark
Sent: Monday, May 6, 2024 2:06 PM
To: PDC_CompPlan_EIS@seattle.gov
Cc: maritza.rivera@seattle.gov
Subject: Comments on Seattle Comp Plan EIS

Seattle Government:

I am providing comments on the draft EIS for the Seattle Comp Plan.

My primary concern is the lack of detailed mathematical and technical analysis concerning the impacts of adding 100,000 new housing units to the City on our precious and limited natural landscape. In particular, what will be the true and expected impact of building these many new homes on the landscape and natural environment that currently exists in the City? This is a basic concern and question that the draft EIS fails to address in any detailed manner. Blanket statements in the draft EIS suggesting that significant adverse impacts on tree cover and other natural landscape elements are not expected is not backed up with any analysis to support those statements.

Professionally authored studies are currently available to the City concerning the need for changes to the City's tree protection regulations which currently do almost nothing to protect significant trees and the acreage of tree coverage in the City. Adding 100,000 new homes to the City that currently doesn't sufficiently regulate tree coverage and protections will do nothing more than exacerbate the loss of canopy cover and effectively increase the effects of solar warming in large parts of the City. Absent any detailed or rigorous technical analysis on these impacts, the draft EIS is postulating an impact analysis that is seriously flawed in stating "significant adverse impacts on trees and canopy cover" is not expected.

Global warming is a phenomenon that is scientifically supported by essentially all corners of professional and scientific studies and literature. The draft EIS makes unsupported conclusions and statements of negligible or no adverse impact from any of the Plan alternatives on existing landscapes, vegetation, trees and tree cover/canopy that fly in the face of scientific studies to the contrary in considering the effects of same on global warming. The

City has a regulatory and legal responsibility to do a much better analysis of these Plans impacts on landscape elements and should, at the minimum, produce that analysis as an amendment to the draft EIS that is circulated for public review and comment.

159-1 cont

Thank you for the opportunity to comment.

Dave Clark
4005 NE 60th Street
Seattle, WA 98115

206-817-8569 (cell)

Letter 160

From: Linda Clifton
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 10:28:12 AM

CAUTION: External Email

Comments Planning and Community Development EIS,

We certainly need more affordable housing as our city grows, but our plans must create healthy and livable communities across our city. 160-1

That means more trees and tree preservation as we build the homes and businesses that will nestle among them. Preserving as many large trees as possible is better for our own well-being and for the planet.

The following are comments with which i wholeheatedly agree on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Linda Clifton
lclifton1@mindspring.com
4462 Whitman Ave N - Upper
Seattle , Washington 98103

DEIS StoryMap Comment

Name: Travis Close

Email: travis.close@gmail.com

Date: 4/8/2024

Comment:

161-1

1. The City should study the impact of higher floor area ratios for middle housing in all residential zones, such as those corresponding to the state model code for middle housing (allowing FAR of 1.6 for sixplex).

2. Study how and where to place social housing projects that are feasible to build (50+ units) in every neighborhood; and how this can impact the production of affordable units.

3. Please study eliminating parking minimums citywide.

4. Please study the impacts of allowing for greater height and density bonuses within a quarter mile of transit stops.

5. Study how allowing increased height of residential buildings, in exchange for reduced lot coverage (including for parking), can preserve tree canopy.

6. Please study the impacts of granting tax breaks & fee deferrals to housing projects that include affordable units.

DEIS StoryMap Comment

Name: Travis Close

Email: travis.close@gmail.com

Date: 5/6/2024

Comment:

I recently learned that there is a density bonus applied to certain projects that provide a certain amount of public space in their yard. It would be beneficial to study the impacts of a density and/or height bonus for middle housing projects with 2-6 units in residential areas that preserve additional green space in their yards beyond the minimums required. This type of incentive could have important, beneficial effects with respect to pervious surfaces, prevention of stormwater runoff, tree preservation, and preventing heat islands. Thank you for your consideration.

162-1

Letter 163

From: Ashley Cohen-Lewe
To: PCD_CompPlan_EIS; LEG_CouncilMembers
Subject: Comment on DEIS
Date: Sunday, May 5, 2024 2:27:17 AM

CAUTION: External Email

Please note my comment on the DEIS:

1: Section P 3-3 states that “none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild.” What is the impact of the plan specifically on Seattle’s plants and animals?

163-1

2: Section P 3-3 states that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." What analysis shows that tree planting programs, coupled with increased hardscape, will compensate for lost urban forest?

3: The plan states that Seattle will make progress toward its 30% canopy goal. The new tree ordinance substantially reduces private land available for trees. How much public land is available to reach the 30% goal? How many trees will need to be planted in these areas every year to make up for trees removed by development?

Sincerely,

Ashley Cohen-Lewe
Anything But Ordinary

Letter 164

May 18, 2024

To: OneSeattleCompPlan@seattle.gov
To: PCD_CompPlan_EIS@seattle.gov
cc: Bruce.Harrell@seattle.gov , maritza.rivera@seattle.gov

I have lived in the Ravenna neighborhood for 39 years. During that time, much has changed throughout the City of Seattle and it is clear we need to plan for continued growth. **The draft Comp Plan and DEIS provide ideas for the future but more work must be done to acknowledge our historic and natural resources as we plan for growth.** Of most concern, is that the plans will bring greater density to our City but will not actually provide affordable housing. New, affordable housing must be planned for along with amenities such as parks, open space, preservation of tree canopy, schools, transportation and other infrastructure. I believe the draft documents can be strengthened with the following in mind.

164-1

Protect Historical Resources

In 2018, the Ravenna-Cowen North Historic District (RCN NHD) was listed in the National Historic Register of Historic Places, as well as the Washington State Register of Historic Places, where it joins other districts which contribute to the rich cultural heritage of Washington State. The proposed One Seattle Plan Land Use Goal LU G16 (page 59) identifies three important reasons to preserve, maintain, and celebrate historical and cultural resources. The RCN NHD fulfills all of these. However, the plans fall short of adequate mitigation to protect these resources.

- Policy LU 16.1 talks about maintaining a comprehensive survey and inventory of Seattle's historic and cultural resources, but this inventory is very incomplete and still needs significant development. This inadequacy must be addressed or resources will be lost due to lack of knowledge/recognition. This is where "advance planning" can actually work (see DEIS page 3.9-121, last paragraph) because it would help *avoid* adverse impacts on historic/cultural resources.

- Policy LU 16.3 talks about supporting designation of areas as historic, cultural, and special review districts, but NHDs are not recognized as special review districts or exemptions. Recognition of NHDs must be added here. Recognition and protection for NHDs must be part of mitigation or these will be lost due to redevelopment related to upzoning and the One Seattle Plan.

- Policy LU 16.4 talks about tailoring development standards for a special review district, but this policy needs to include NHDs or they will be degraded and lose their historical/cultural integrity and ability to interpret Seattle's history

- Policy LU 16.5 talks about encouraging adaptive reuse of designated landmark structures by allowing uses in these structures that might not otherwise be allowed under the applicable zoning. This policy should also be applied for structures in historic districts and NHDs in cases where this approach could help the district retain its architectural integrity.

- Policy LU 16.6 talks about incentives to restore or reuse designated landmark structures and specified structures within designated districts. While this policy is fairly narrow, it should be *broadened to include additional incentives for restoration and reuse of historic structures* and *should also apply to NHDs* but fails to include them. These incentives should also apply to NHDs and/or contributing structures within NHDs to avoid or mitigate adverse impacts and to prevent loss of the NHD's integrity.

- Policy LU 16.7 talks about protecting the scale and character of the established development pattern in historic districts, while encouraging compatible and context-sensitive infill development. This is a very important policy, however, it fails to include NHDs. These incentives should also apply to NHDs to avoid or mitigate adverse impacts.

The DEIS provides a list of "Potential Mitigation Measures (see pages 3.9-119 and 3.9-120). While many of these can be helpful and/or are already required under other regulations, mitigation for historic/cultural resources and NHDs needs to incorporate these measures more substantially.

Also, please consider that mature trees and landscape are elements of RCN NHD, as well as many other historic/cultural districts. Protection of these not only provides part of the context for NHD, but recognition of the NHD reciprocally can help protect these elements of the environment.

164-1 cont

Improve Land Use and Housing Policies

It is interesting that for Regional Centers, GS 3.2, p. 22 has the language "Recognize and plan for the unique role and character of different neighborhoods within large regional centers." ***The same language be added for Urban Centers (GS 4, p. 24 and 25) and Neighborhood Centers.*** The Roosevelt Urban Center (p. 25) is a mix of commercial, high rise and "craftsman."

LU 2.9 (p.38) states: *Encourage the preservation of characteristics and features that contribute to communities' multiple identities, including in areas of historic,*

164-2

architectural, cultural, or social significant." This is a very important policy and it needs to be taken seriously.

To help facilitate this, LU Policies should be added to recognize and plan for the unique role and character of different neighborhoods:

164-2 cont

- Note that the definition of middle housing in E2SHB 1110, p. 5, para (21) (lines 32-35), "means buildings that are compatible in scale, form, and character with single-family houses ... ["single family" is defined at p.7, para.32, lines 32-34.])

  Add a new LU that states the same language as above – *Middle housing means buildings that are compatible in scale, form, and character with single-family houses.*

- Add the italicized language to LU 4.1 (p.40). Allow for flexibility in development standards so existing structures, *trees and green space* can be maintained and improved and new development can respond to site-specific conditions.

- LU 4.18 (p.48), second bullet, add italicized language – responds to the surrounding neighborhood, *character,* and context, including historic resources. Thus, for the RCN NHD and any other NHD, the type of housing built should preserve the character of the NHD.

With regard to housing/displacement:

The proposed upzoning will increase the tax base for properties in the RCN NHD that will continue to displace owners from our neighborhood (this has been happening since the last rezone) as property taxes have become unaffordable for homeowners. This trend shifts ownership of these historic homes and many historic properties to developers and lessors, thus consolidating the trend of land ownership. This applies to any other NHD or historic district, and LU policies to prevent this are inadequate.

164-3

Another type of housing that exists in our neighborhood and the RCN NHD, which is located close to the University of Washington, is the group home, usually a historic home that has been rented to a group of unrelated people who often are college students and/or people with jobs in Seattle. This type of housing offers an often more affordable alternative for housing groups of people, as well as for people who prefer older buildings and garden areas. This type of housing will be displaced by redevelopment. Many existing Seattle homes can be subdivided or use a "community" model with four bedrooms with the other spaces for the shared use within the structure. Adding policies to further protect this type of use increases housing flexibility and can help protect historic housing.

Still of concern is that while the One Seattle Plan would create additional housing units per the directive of E2SHB 1110, increasing the number of units will not bring affordability. Thus, the proposed impacts on displacement and historic preservation caused by the proposed upzoning would occur without bringing enough benefit to justify the losses. This was largely the basis behind the recent Los Angeles County Superior Court ruling that overturned CA Senate Bill 9, which had overturned single-family housing in five California cities. See: https://www.latimes.com/homeless-housing/story/2024-04-29/law-that-ended-single-family-zoning-is-struck-down-for-five-southern-california-cities .

164-3 cont

Protect Plants, Animals and the Natural Environment

A stated goal of the Comprehensive Plan is to "protect and enhance" the natural environment (p.36). This document includes some positive goals and policies but falls short in several areas.

Furthermore, the DEIS falls short:

164-4

The DEIS, 3.1.3, states that "*Projects that entail vegetation clearing would likely reduce the diversity and/or abundance of plants and animals on and near the affected parcels. These impacts would be expected to diminish over time as vegetation regrows in temporarily disturbed areas."* Most projects that are moving forward are maximizing lot coverage, with little setbacks or vegetative areas around them. This general statement is misleading and implies a no problem exists when developments occur. Mitigation must address this issue.

The DEIS, p. 3.3-7, states, *"In 2023,... the city's tree ordinance was updated. It is anticipated that these updates will decrease the rate of canopy loss associated with residential and commercial development."* **Many urban forest practitioners, including Seattle's Urban Forestry Commission, do not share the expectation that the new tree protection ordinance will decrease the rate of canopy loss associated with residential and commercial development, especially on Multifamily, Commercial, and Seattle Mixed Zones.** The combination of high hardscape allowances, rigid delineation method for tree protection areas, and reduced authority by departments to request alternate designs to accommodate tree preservation make it likely that any sizeable, regulated tree on these lots would be permitted for removal.

The DEIS conclusions are hypothetical, not fact-based:

The DEIS concludes, "Action alternatives would tend to increase regional tree canopy by focusing growth in urban areas and preventing sprawl." "[D]evelopment within the urban environment of Seattle could indirectly benefit the tree canopy pressure in less-developed areas outside the city." (Emphasis added.) The DEIS does not identify any data supporting an indirect benefit that regional tree canopy would increase, not even

the acreage currently remaining that is less developed. Sprawl continues, with suburban areas with lawns that do not provide needed habitat for birds and other wildlife. Nor does the DEIS identify the reasons people seek housing outside Seattle. And, apparently, no one at OPCD has bothered to traverse the "region." King County is rapidly becoming one big sprawl as people search for more affordable housing options outside of Seattle. Moreover, state law (E2SHB 1110) now requires most municipalities to increase density, which could mean more tree cutting region-wide. The DEIS conclusions are fictitious, unsupported hypotheses and pure fantasy.

The reality is that if real mitigation to preserve Seattle's tree canopy is not implemented immediately, Seattle will be a polluted, heated environment impacting its residents, other animals and native flora. One only has to look at the Roosevelt Urban Village, parts of which transformed within four years to a heat island.

With regard to the tree canopy:

On p. 150, Goal CE G12 refers to the tree canopy goals and lists several related policies. The following goals/policies should be added:

- Strengthen and enforce tree protections throughout the City to ensure Seattle's current canopy tree policies and goals continue. The Seattle One Plan would inexplicably reduce that policy's goals.

164-4 cont

The 2035 Seattle Comprehensive Plan includes Policy EN 1.2 (p. 133) which states, "Seek to achieve citywide tree canopy coverage to **30 percent by 2037, and 40 percent eventually,** which maximizes the environmental, economic, social, and climate-related benefits of trees." This is **current Seattle policy**. Current Seattle Policy also includes Policy EN 1.7 which states, "Promote the care and retention of trees and groups of trees that enhance Seattle's historical, cultural, recreational, environmental, and aesthetic character*." **Both policies should be retained.***

However, for unexplained reasons, without discussing the adverse implications of this major reduction in tree canopy, the Seattle One Plan changes **current policy to a *goal* of 30 percent with no increase over time.** Moreover, the goal, CE G12 (p.151) *makes a false statement of fact.* The actual current tree canopy is 28 percent due to a loss of 235 acres, the size of Green Lake. CE 12 maintains "Seattle has a healthy urban forest with a tree canopy that covers at least 30% of the land [this is not true.…

It is critical that the Seattle One Plan maintain the 2035 Comp Plan Policies EN 1.2 and EN 1.7, for multiple reasons:

- The more trees, the better for all of us. Trees absorb and mitigate water run-off. Trees absorb pollution. Trees reduce carbon. Trees reduce heat, which is why Seattle is trying desperately to plant more trees in underserved communities to

prevent residents from dying. Currently, due to recent development in Neighborhood Residential areas, 19%, or more, tree canopy was lost. Seattle One Plan, Ex. 3.3-7. Neighborhood Residential has the highest percentage of trees in the city. The Ravenna-Cowen NHD is a green oasis with plentiful trees and green cover where Roosevelt residents now come to escape from their heat island high-rise homes. The NHD represents a historic era and embodies the reasons current Policy EN 1.7 should remain in effect.

- Trees also contribute to a personal sense of well-being and reduce crime. https://www.motherjones.com/environment/2019/04/trees-crime-cincinnati-philadelphia-ida-b-wells-chicago/.

- Adequate tree canopy is essential for birds and other wildlife. Among the 120+ birds tabulated city-wide by the annual Seattle Audubon Christmas Bird Count, tree-dependent species include: Pileated, Hairy, Downy, Northern Flicker and Red-breasted Sapsucker Woodpeckers; Barred, Western Screech, Great Horned and Saw-whet Owls; Cooper's, Sharp-shinned, and Red-tailed Hawks; Black-throated Gray and Townsend's Warblers, Pacific Wren, Brown Creeper, Red-breasted Nuthatch, and Varied and Swainson's Thrush. These birds require a dense forest canopy in which to hunt, feed, nest and take cover. These birds become scarce when tree canopy cover falls below 20%. There is a direct relationship between bird abundance and tree canopy. Some might say, just develop everything except the designated parks and green spaces***. As all major wildlife and bird organizations and conservation scientists will tell you, however, these "postage stamp" preserves are not viable unless green corridors connect them. The tree canopy in Seattle is critical to ensure these green corridors.***

  The Ravenna-Cowen/Roosevelt community is keenly aware of the impact from tree reduction. Our naturalist conducted a bird count. From Ravenna Park north, the bird species decreased dramatically as the trees diminished. Due to development in Roosevelt, where high-rise apartment buildings developers bulldozed all the trees, within a few years that area became a heat island with few birds and few species.

- Need for Additional Policies and Goals Due to Climate Change Impact on Tree Canopy. The Seattle One Plan contains two policies that address tree canopy and climate change, CE 12.2 and CE 12.3 (p. 150). Additional policies are need to address this existential issue. Tree death from heat is acknowledged in the discussion, but the policies are vague. Communities around the world are emphasizing the use of native flora in landscapes and researching the use of species that would adapt readily to warmer climate. See: https://www.discovermagazine.com/environment/cities-are-rethinking-what-kinds-of-trees-theyre-planting If Seattle is to retain a healthy tree canopy, the Seattle One Plan must address this issue with more specificity, with specific goals, policies and

164-4 cont

3194

time-tables. This issue requires research, knowledgeable staff, and funding.

With regard to the natural environment and urban wildlife:

- The Climate and Environment Section beginning on p. 137, should include **more specific goals and policies regarding the significance of biodiversity and urban wildlife.**

  This idea is reinforced by Professor John Marzluff, University of Washington Ornithology, who points out in his book Welcome to Subirdia, "When natural land cover measured across areas the size of neighborhoods, metropolitan areas or counties drops to less than one-third of its historical extent, its ability to sustain native biodiversity crumbles." Marzluff warned that "…not considering the amount and arrangement of green spaces that connect urban people with nature is inefficient and dangerous." He added, ***"To remember what biodiversity is, and why it is important, we must conserve nature close to where we live and work."***

  Neither the Seattle One Plan nor the Seattle Plan DEIS provide any base-line data as to the current bird count (by number and species) for indigenous and migratory birds and the impact of the Plan.

  Specific policies regarding natural environment and urban wildlife should include the following:

  - First, determine status and trends of biodiversity within Seattle;
  - Recognize and support Indigenous-led conservation and environmental stewardship;
  - Seek new financing mechanisms and incentives for conservation, natural space management, urban forestry, etc.;
  - Protect and enhance habitat quality within natural areas, parks, and open spaces
  - Reduce urban hazards to biodiversity, including pesticides; reflective glass; plastic and other pollution; and negative impacts from certain human-associated and introduced species, such as outdoor cats and unleashed dogs.
  - Encourage residents and visitors to learn about, celebrate, study, and conserve urban biodiversity.
  - Maintain current trees and green cover on Neighborhood Residential and Multifamily lots.

164-4 cont

With regard to Mitigation:

The DEIS mitigation options are incomplete and fail to consider substantive steps and regulations that would reduce loss of trees/wildlife habitat. The mitigation measures below will help preserve trees and green cover on Neighborhood Residential lots

- *Amend and strengthen the Seattle Tree Ordinance as recommended by the Urban Forestry Commission.*

- *Retain current Neighborhood Residential setback requirements.* This will reduce the likelihood that tree canopy and green cover will be reduced.

- *Require developers to design projects that preserve trees, with oversight by professionals who know how to accomplish this.* While the DEIS sets out "green" alternatives, such as permeable driveways, solar panels, wood construction, limiting fossil fuels, it inadequately addresses the most valuable of our green resources, trees. There is technical knowledge on how to build and protect trees. Groups of architects now design buildings focusing on tree preservation. See, for example, Matthews Beach Cottage – NW Green Home Tour. To accomplish retention of as many trees and green space on Neighborhood Residential lots, the DEIS is deficient because it did not address solutions, such as requiring developers to identify the location of trees and species at the onset of the permitting process; requiring the developer to design the project to retain the maximum number of trees, with oversight by arborists and other professionals who understand how to accomplish tree retention.

164-4 cont

With regard to Access to Public Open Space, p. 157:
This section speaks to “Public Space” and uses this term to imply parks and natural areas. Public Space can be unfortunately be interpreted by some as a concrete plaza. This term should either be deleted or defined as a space that include a majority of natural landscaping similar to the definition of the “Open Space” (which is defined as containing elements of the natural environment). Courtyards and the like should be incentivized by the City for new developments, but again these must include natural landscaping.

Thank you for your consideration of my comments.

Lori Cohen
Seattle resident

3196

Letter 165

From: Alex Colledge
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 8:42:59 AM

CAUTION: External Email

Comments Planning and Community Development EIS,

I am writing to let you know about the need for trees in an era of climate change. The reason I moved to Seattle was because of the stunning tree canopy which made the city so beautiful and livable. Of course, we need more affordable housing as the city grows, but we also need to have healthy and livable communities. 165-1

I know today that you are making important decisions about the next few years for Seattle. The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

There are lots of ways that canopy mitigation can occur.

We can reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
We can require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
We can consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
I urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration,
Alex Colledge

Alex Colledge
mic2andal2@gmail.com
5716 Latona Ave. NE
Seattle, Washington 98105

Letter 166

From:	M C
To:	PCD_CompPlan_EIS; PCD_OneSeattleCompPlan
Cc:	Lowe, Marco; Rivera, Maritza; Morales, Tammy; Woo, Tanya; Nelson, Sara; PCD_CustomerService
Subject:	One Seattle Plan, support for density petition for MR rezoning per resident Matthew Cramer
Date:	Thursday, May 2, 2024 6:59:16 PM
Attachments:	OneSeattle Roosevelt South MR Rezone per Cramer.pdf
Importance:	High

CAUTION: External Email

Hello Office of the Mayor and City Officials,

I am writing you to express my support for higher density in my neighborhood and specifically to include a portion of the Roosevelt Neighborhood in the upzoning plan in work under the Mayor's current draft of the comprehensive One Seattle plan. The specified area, my neighborhood, is a perfect transition zone candidate for MR (6 story apartment building) zoning as it is close to existing tall infrastructure, a freeway, and is very close to the U-District Light Rail station among other transit lines. Please read, consider in relation to the OneSeattle plan draft, and record the attached letter petitioning for higher density in my neighborhood. 166-1

I hope our aspirations for higher density are aligned and I look forward to explicit MR upzoning in the specified region.

Thank you for your time and consideration.

Warmly,

Matt Cramer
4709 9th Ave NE
Seattle WA 98105
mocramer@hotmail.com

Matt Cramer
4709 9th Ave NE
Seattle, WA 98105

May 1, 2024

By Email Only

Office of Planning & Community Development
City of Seattle
P.O. Box 94788
Seattle, WA 98124-7088
oneseattlecompplan@seattle.gov;
PCD_compplan_EIS@Seattle.gov

Re: *Comments to One Seattle Plan and its EIS: 9th Avenue Northeast and Area Midrise (MR) Opportunity*

Dear Office of Planning & Community Development:

I appreciate the opportunity to comment on the Draft One Seattle Plan ("Draft Plan") and the related Draft Environmental Impacts Statement ("DEIS"). This letter requests an upzone to Midrise (MR) zoning (and a complimentary redesignation on the future land use map) for my home and neighborhood, so that we can do our part to support the Mayor's One Seattle Plan by contributing new housing to our community.

I request that this Midrise (MR) upzone and redesignation be included in the scope of the FEIS study and executed by the Mayor's Final Recommended Plan and its proposed implementing ordinances.

A. Background: Unintended Consequences under Current Code.

I live at 4709 9th Avenue NE, APN 0889000030, which is depicted and marked with a small grey spot at right.

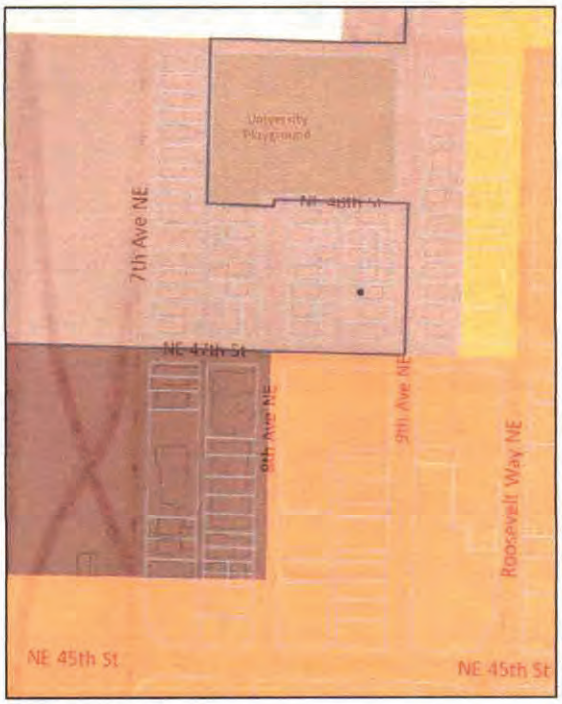


Figure 1. Current zoning surrounding my property. Light brown is low-rise, mustard yellow is neighborhood commercial, orange is Seattle Mixed, and darker brown is mid-rise.

166-1 cont

My home is zoned LR1, but is located just outside of the current University District Urban Center (which the Draft Plan proposes transitioning into a "Regional Center"), and just one block north of SM-U 95-320 (M1) zoning (and a tower of more than 200 feet, with further 60-foot buildings immediately west of that. As you can see, the area that includes my home also is very well served by frequent transit and other vibrant urban services on Roosevelt and at 45th. The University Playground is another immediately adjacent gem that should be accessible to more housing units.

Unfortunately, as of now the Mayor's Draft Plan proposes to leave my home, block and neighborhood relegated to "Urban Neighborhood" future land use designation, where dense housing more appropriate to this location is effectively prohibited. The currently proposed future land use redesignation could conceivably drive density ***downward*** as compared to the Multi-Family Residential Area future land use designation that is effective today.[1] That result flies in the face of the Mayor's goals. 166-1 cont

Under the vision set forth by the Mayor and the policies set forth in the One Seattle Plan, my home and neighborhood would be a fantastic place to create badly needed Midrise (MR) housing density at market rents, affordable rents, or a mix. It is no longer a fit for Lowrise zoning, and certainly not a fit for an Urban Neighborhood future land use designation.

I have watched with pride as the neighborhood has grown up into a bustling area of midrise apartments around me. It is also notable that an upzone to MR for my home and neighborhood would help provide great housing capacity *in a location where displacement will be minimal,* due to a high population of undergraduate and graduate students who generally are rotating in and out of the neighborhood on a yearly (if not quarterly) basis. In light of comprehensive transit and parks investments, together with the general urban maturation of the University District, my home and neighborhood's current Lowrise zoning status is outdated, artificially constraining the transit-oriented density and affordability that properties like mine could provide. I request the following:

- **The Mayor's zoning implementation map (which I understand is to be introduced in draft later this summer) should propose rezoning this area to Midrise (MR).**
- **The Mayor's Final Recommended Plan should include this area within the adjacent Regional Center future land use designation, or *at a minimum*, the Corridor future land use designation studied in the DEIS and initially proposed in the OPCD staff draft.**
- **The Final EIS should study inclusion of this area within the adjacent Urban Center (soon to be renamed "Regional Center"), and should study an upzone of this area to, *at a minimum*, Midrise (MR) zoning.**

---

[1] *See* 2022 Comprehensive Plan at page 41.

Thank you for all your work on the One Seattle Plan. My neighborhood stands ready to work with you in making our community's housing goals a reality.

Sincerely,

Matt Cramer

166-1 cont

CC: Rico Quirindongo
Marco Lowe
Council President Sara Nelson (At-Large)
Councilmember Maritza Rivera (District 4)
Councilmember Tanya Woo (At-Large)
Councilmember Tammy Morales (Land Use Committee Chair; District 2)

Letter 167

From: Beverly Crocker
To: PCD_CompPlan_EIS
Cc: Rivera, Maritza
Subject: Environmental Impact statement
Date: Thursday, May 2, 2024 8:24:56 PM

CAUTION: External Email

I am concerned about the success of the 30% tree canopy goal. How have you been able to calculate the recovery of lost tree canopy when so many city trees have disappeared and are continuing to disappear, while expecting that they will be adequately replaced by planting young fragile saplings in their place? How much public land space do you have for increasing the tree canopy and who will take care of all the new trees for the next several years to ensure their survival and growth? 167-1

Thank you,
Beverly Crocker

Letter 168

From: Beverly Crocker
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 11:59:38 AM

CAUTION: External Email

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

168-1

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Beverly Crocker
beverly.canada@gmail.com
5540 37th Ave NE
Seattle, Washington 98105

From: Carolyn Crockett
To: PCD_CompPlan_EIS; PCD_OneSeattleCompPlan; Moore, Cathy; LEG_CouncilMembers
Subject: Comments on One Seattle Comprehensive Plan and draft Environmental Impact Statement
Date: Monday, May 6, 2024 4:07:21 PM

CAUTION: External Email

Office of Planning and Community Development

Re: One Seattle Comprehensive Plan and draft Environmental Impact Statement

169-1

My name is Carolyn Crockett. Thank you for giving me the opportunity to comment on the Draft Plan and EIS. We bought our home in the Haller Lake neighborhood in 1976. My community interests have focused on the Haller Lake P-Patch which I helped found in 1998, the Haller Lake Community Club where I serve as Parks Chair, and Northacres Park.

Whereas growth is inevitable and there is a need for more housing, Seattle should not promote growth in a manner that creates problems in the future. One looming issue facing the world is increasing global temperatures. Tree canopy has been shown to mitigate neighborhood temperature. Of the 5 Alternatives in the Comprehensive Plan draft, I favor Alternative 2, Focused. Given that Alternative 1, no change, is unrealistic, Alternative 2 is the best option in that it allows for population and job growth with the least negative impact on tree canopy and biodiversity. The City of Seattle Assessment of Tree Canopy 2021 report (p. 21) found that, in 2021, neighborhood residential comprises 47% of city's tree canopy. By focusing development, per Alternative 2, more tree canopy will be preserved. The most significant canopy in Seattle is comprised of tall native species, such as Douglas firs, which, outside of parks (such as Northacres), are found on residential lots. Such trees are many decades old and would not be replaced in significant numbers by mitigation efforts such as street trees. These tall trees are also habitat for many urban wildlife species. For example, in Seattle it is not uncommon to see Bald Eagles perched, and sometimes nesting, in them. Street trees are not a replacement for these tall native evergreens.

In addition to examining the draft One Seattle Comprehensive Plan and draft EIS, I have reviewed suggestions provided by Birds Connect Seattle (formerly Seattle Audubon) and Friends of Seattle's Urban Forest.

I wholehearted agree with Birds Connect Seattle (BCS) that the Plan should reference Biodiversity as well as Climate and Sustainability. I agree with BCS's suggested changes to the Comp Plan shown in red on their web page: https://birdsconnectsea.org/wp-content/uploads/2024/04/A-bird-and-nature-advocates-guide-to-commenting-on-Seattles-draft-2024-Comprehensive-Plan-update-v2.pdf
I especially wonder why the goal of "30% tree canopy by 2037" was changed to exclude a date goal? Is this because the EIS suggests that indeed a substantial decrease in canopy will result

from all Alternatives except Alternative 1?

The remainder of my comments are copied from an email from Friends of Seattle's Urban Forest. These comments and questions are very well thought out and presented, so I do not feel the need to reword them. I have pasted them verbatim below.

169-1 cont

Thank you for considering my comments,

Carolyn Crockett
13034 1st Ave NE
Seattle, WA 98125-3005
(206) 363-9527
ccrockett@mac.com

From Friends of Seattle's Urban Forest email dated 5/3/24:

P 3-3-29-30 Please analyze the potential impact of the 5 options on Seattle plants and animals. This is a Seattle EIS, not a regional or state EIS. Saying "unlikely to result in appreciable impacts on regional populations of plants or animals"' and "none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild" is avoiding commenting on the specific impacts on Seattle plants and animals.

p 3-3-30 Saying that "none of the action alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." is not backed up by facts but speculative at best. The new tree protection ordinance actually increases the potential for tree removal in several ways. One is that all the developmental areas covered by the ordinance state that the newly defined "basic tree protection area cannot be modified" despite Portland, Oregon and the Northwest Society of Arboriculture saying it can be modified to save trees. This and current lot coverage of 85 - 100% for multifamily lots and above and rezoning to occur means more trees, especially large ones, will be removed. What is your estimation of potential canopy acreage loss (over 5 year periods consistent with the city's canopy studies) with increased development density in each alternative?

What is your estimation of planting needs and time frame to replace the lost canopy (over 5 year periods tracked by the city's canopy study)?
Is canopy replacement equivalence even possible with replanting since removed trees, if not removed, would have increased growing according to scientific articles?

What is the acreage available and suitable for planting trees in each of the following public areas- the city's right of ways, Natural Areas and Developed Parks?

How many trees and what size will need to be planted in these areas every year to make up for trees and canopy removed during development on lots?

169-1 cont

What is the available acreage available to plant trees on private property?

When will it be possible to reach the 30% citywide goal?

What potential is there for more than 30% tree canopy in Seattle over time?

Is up to 40% canopy coverage, over time, as proposed in the previous Comprehensive Plan possible?

Canopy volume, especially of coniferous trees during our rainy season, are critical factors in reducing stormwater runoff. What is the projected loss in canopy volume over the next 20 years as big trees, including conifer trees are removed?

What is the projected increase in stormwater runoff and what costs are associated with on site and alternative city water management policies of stormwater and pollutant runoff as a result?

As to commenting on other tree potential mitigation measures, add:

Amend the Tree Protection Ordinance to require developers to maximize the retention of existing trees 6" DSH and larger.

Give SCCI Director the ability to ask for alternative site designs to save trees.

Support building higher and building attached units to allow for tree retention and planting areas like Portland, Oregon has with 20% areas for multifamily and 40% for its 1-4 unit family zone.

Amend Tree Protection Ordinance to require ordinance to apply to all city land use zones.

Remove the "basic tree protection area" loophole in the Tree Protection Ordinance that allows developers to unnecessarily remove almost all large trees on lots.

DEIS StoryMap Comment

Name: Robbie Cunningham Adams

Email: robbieadams.uw@gmail.com

Date: 4/8/2024

Comment:

-The City should study the impact of higher floor area ratios for middle housing, such as those corresponding to the state model code for middle housing (e.g. allowing FAR of 1.6 for sixplex).
-Study how and where to place social housing projects that are feasible to build in every neighborhood
-Study eliminating parking minimums citywide
-Study the impact of allowing for bolder height and density bonuses within a quarter mile of transit stops

170-1

Letter 171

From: Ethan Macey-Cushman
To: PCD_CompPlan_EIS
Subject: This doesn"t go FAR enough
Date: Friday, March 29, 2024 4:52:30 PM

CAUTION: External Email

My urban-policy lingo humor is a real hit, you'll have to believe me.

In all seriousness, though, I'm deeply disappointed with the proposal for the comprehensive plan. You asked the people of Seattle what we wanted a year ago, and we went out of our way to tell you: over 60% of respondents wanted Alternative 5 or more. What was it all for? Is there some silent majority that's strongly in favor of restrictive floor-area ratios, parking requirements, and regressive zoning just steps away from light-rail stations? No. There's no silent majority, just a wealthy minority. And it's a terrible shame that you're listening to them instead of the experts, the public, and your own common sense. 171-1

Ethan Macey-Cushman

Letter 172

From: dackchr@gmail.com
To: PCD_CompPlan_EIS
Cc: Rivera, Maritza
Subject: Questions on Environmental Impact - One Seattle Comp Plan
Date: Sunday, May 5, 2024 4:07:07 PM

CAUTION: External Email

Hi –

I have some questions and concerns about the environmental impact of the draft Seattle Comprehensive Plan:

1. How will the plan impact the existing plants and animals that call Seattle home?
2. With increased hardscape and loss of urban forest, where is the analysis that shows tree planting programs will be enough to avoid adverse impacts on tree canopy cover?
3. To reach the 30% canopy goal, how much public land will be made available? To compensate for trees lost due to development, how many trees will need to be planted every year?

172-1

Regards,
Christopher Dack

From: Corey Dahl
To: PCD_CompPlan_EIS
Subject: I support a stronger, more affordable Seattle
Date: Monday, May 20, 2024 4:21:05 PM

CAUTION: External Email

Hello,

I'm writing to express my support for the Housing Abundance Map and, thus, revising the draft comprehensive plan. I want a Seattle that can accommodate our existing and new neighbors. In order to be a truly inclusive city, we must act now to build more housing and more affordable housing. The current draft plan falls far short of our city's housing needs and failure to meet these needs in this plan will hurt working people. I urge changes now before it is too late. 173-1

Thank you,

Corey Dahl
4423 S Brandon St
Apt 12
Seattle, WA 98118

Letter 174

From: roubadan@aol.com
To: PCD_CompPlan_EIS; Moore, Cathy; Morales, Tammy; Hubner, Michael; Strauss, Dan; Carroll, Patrice
Subject: feedback on the comp plan draft eis
Date: Monday, May 6, 2024 4:12:41 PM

CAUTION: External Email

Mr. Holmes,
I'm writing with feedback on the draft comprehensive plan and specifically on the EIS that is available at the website https://storymaps.arcgis.com/collections/bc280a13a8ee4db28cd4d602ffe69336?item=1.

I live in the Ballard area and have for 40 years. I grew up across the street from Haller Lake United Methodist Church about 3 blocks from the projected light rail station at 130th. I have been a friend of the church for about 20 years. We have become aware of the need for more housing in the area especially affordable housing. Churches are rising to the occasion but need help meeting this need. The Zoning changes happening with the Comprehensive plan is one way to provide help. 174-1

I am working with the congregation in a discernment process that is leading toward building housing on the property at 133rd and 1st Ave. NE. We have talked with neighbors and community leaders in our area. We have met with city representatives and government officials. We have partnered with community organizations and grass roots organizers. What we are hearing is that there is widespread support for more dense housing in the area, especially on this property. We see the possibility for that kind of development in Alternative 5 of the EIS and support moving in the direction of more dense housing throughout the city.

However, we also know from experience, and hear repeatedly from our neighbors, that the neighborhood around our proposed project is sorely lacking in small businesses and options for gathering, shopping, and creating community. Therefore, we would like to be able to consider creating such a space in the development on our property when we are ready to partner with a developer. None of the alternatives in the DEIS currently allow for commercial or mixed commercial and residential development on our corner. **We would like to request that the DEIS be revised to include NC2-55 zoning for the church property, Lots 3, 4 and 5, of block 65, in the H.E. Orr Park Division No. 6** so that a development might be considered that includes both commercial and residential components.

We are still in the beginning phases of planning. We don't have a developer yet but we have talked with several possible developers and have heard that the zoning, current and projected by the DEIS, limits their ability to dream with us about how we might become community with neighbors who aren't here yet.

Please consider this request and be part of the dream to build a community with space for all.
Thank you,
Jon Daniel
Haller Lake United Methodist Church
13055 First Ave. NE
Seattle, WA 98125
Cell: 206-226-1690

Letter 175

From: Casey Daniels
To: PCD_CompPlan_EIS
Subject: We need more housing
Date: Saturday, May 4, 2024 12:30:14 PM

CAUTION: External Email

The city's released growth plan is wildly insufficient for Seattle's needs. Looking through it makes me wonder if city leadership even realizes that we're in the midst of a housing crisis. Just to be safe, hey, city leaders, we're in a housing crisis. Rents are out of control. Homelessness is out of control because people can't afford the rent. People are spending less at local businesses because more and more of their money is going towards rent. There are just plain more people who want to live in Seattle than there are places for them to live. 175-1

But how to fix this problem? Well, I've heard of this radical new idea of responding to increased demand and rising prices by increasing supply. OPCD's earlier housing abundance map, for example, provides something much closer to what the city actually needs. Now, I know building more housing in response to demand is a controversial idea in some circles, so I'll attempt to address some of the common criticisms.

Displacement. Some people claim that building more housing will displace those already living in the area. There's one problem with that argument. People are already being displaced. Turns out that rising prices can displace people just as easily as tearing a building down. At least building more housing means that the displaces people can remain within their existing neighborhoods rather than having to move to Tacoma because it's the only place they can afford.

Character of the neighborhood. This is a classic argument for NIMBY types. The idea that building denser housing like triplexes, row houses, and low rise apartments ruins the "character of the neighborhood." This is an argument that is dripping with classism and occasionally racism. "Ruining the character of the neighborhood" in this case seems to mean "letting the poors in." Sometimes it even means "letting the Blacks in." I don't want to live in the kind of city where these kinds of arguments are entertained. The other problem with this argument is that high homeless rates aren't exactly good for the character of the neighborhood either. For that matter, loss of the residents who provide that character through rising rents isn't great either. Finally, I doubt anyone would call the neighborhoods of Paris "lacking in character" despite much higher levels of density than what we have in Seattle.

Traffic. More people means more traffic, right? Well, not exactly. It turns out that people who live in denser, mixed use, neighborhoods drive a lot less. After all, if most everything you want is within walking distance, why drive? In addition, people who live on transit corridors are more likely to take transit rather than drive. Finally, shorter commutes contribute less to traffic than longer ones. If people can't live in the city, they'll live in the suburbs, and drive into the city for work. They'd clog up our city streets with their longer commutes, and the city wouldn't even get their tax revenue because they'd be living elsewhere.

That's actually a springboard to one last point. It's a well-established fact that denser neighborhoods bring in more tax revenue to the city. This is a strong enough effect to even outweigh the effects of wealth. On a dollar per land area basis, a low-income apartment building brings in more tax money to the city than the swankiest mansion. For a city that's struggling with a budget deficit to the point of cutting funding to popular social programs, taking advantage of this effect is an absolute necessity. A housing plan as lacking as the current one will instead serve to drain the city's coffers as it drives people to the suburbs, where they'll still use city resources by driving on city roads to jobs in the city, but will pay property taxes outside of it. In short, a denser housing plan will make balancing the budget much easier, while the current plan will make it substantially harder.

I could try to tie all this together with one last grand statement, but if you've read this far, you probably get the point by now. If you actually want what's best for the city of Seattle, you'll give us a better housing plan. It's really as simple as that.

Sincerely,

Casey Daniels

175-1 cont

DEIS StoryMap Comment

Name: Ruth Danner

Email: ruthdannerofjuneau@gmail.com

Date: 4/3/2024

Comment:

Much research has been done by UW Traffic Lab's ("Final 50 Feet," "Alley Inventory") and SDCI ("Residential Loading Berth and Delivery Activity and Standards Research") documenting Seattle's need to adopt land use changes to meet the growing need to adopt and implement a formal "Urban Freight Plan," to better manage direct delivery of goods and services to dense neighborhoods. Left unmanaged, increased deliveries to increasingly dense neighborhoods results in increased traffic congestion and avoidable carbon emissions. Adoption of an effective Urban Freight Managment Plan should be called out as mitigation for transportation impacts which the EIS predicts will be significant under all five alternatives.

176-1

Letter 177

From: Deborah Davis
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Tuesday, May 7, 2024 9:34:40 AM

CAUTION: External Email

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

177-1

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Deborah Davis
davis122@gmail.com
7715 1st Ave NE
Seattle, Washington 98115

Letter 178

From: Courtney Davis
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 6:06:29 AM

CAUTION: External Email

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

178-1

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Courtney Davis
cdavis622@gmail.com
1232 S State Street
Tacoma, WA 98405

Letter 179

From:	KD
To:	PCD_CompPlan_EIS
Cc:	Moore, Cathy
Subject:	Three Critical Questions for the City"s Comprehensive Plan
Date:	Monday, May 6, 2024 4:59:27 PM

CAUTION: External Email

Hello!
I have three questions to consider, please, in relation to the city's comprehensive plan and Section P 3-3...

1. **Can you please let me know, what is this impact precisely on Seattle's plants and animals?**
2. **Also, what research proves that tree-planting programs, along with increased tree removal, will make up for lost urban forest?**
3. **I'm also wondering, how much public land is available to succeed the city's canopy goal of 30%, as stated in the plan? Is there a record available stating how many trees will need to be planted in these areas every year to make up for trees that would be removed with development?**

179-1

Thank you in advance for diligently looking into these questions. This is critical to our environment. Every tree lost is critical right now to our environment and the climate. And, in Seattle, we love our urban nature!

Sincerely,
-Kirtana Devi

Sent with Proton Mail secure email.

Letter 180

From: Gabriel-Bello Diaz
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 11:33:18 AM

CAUTION: External Email

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

180-1

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Gabriel-Bello Diaz
gabrielbellodiaz@gmail.com
707 South Snoqualmie Street, 1D
Seattle, Washington 98108

From: Mary Lou Dickerson
To: PCD_CompPlan_EIS
Subject: Question
Date: Saturday, May 4, 2024 11:13:57 AM

CAUTION: External Email

Hello, can you tell me what is the plan for encouraging the growth of large trees, and saving the large trees already in Seattle? Is there any plan to build the tree canopy in Seattle?
Thank you for a response.
Mary Lou Dickerson
Sent from my iPhone

181-1

Letter 182

May 6, 2024

Jim Holmes
Seattle Office of Planning and Community Development
600 4th Ave, Floor 5
Seattle, WA 90194

Yes, we need more *affordable* housing, but we also need to have healthy and livable communities that are climate resilient.

The following are comments on the One Seattle Comprehensive Plan's Draft Environmental Impact Statement (DEIS).

- Stormwater will be an issue with the planned extensive increase is impervious surfaces will increase runoff. What measures will be taken to prevent flooding streets and buildings and the scouring of receiving creek beds? 182-1
- The DEIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity, or sustainable urban forestry.
- The DEIS does not analyze the probable scale of impact of tree loss or give numbers and does provide analysis of cumulative impacts. Yet the DEIS speculates, without evidence or analysis, that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover."
- No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

- Protect mature tree canopy as mitigation for stormwater management.
- Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
- Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
- Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
- Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration. Please make me a party of record for future communications on the EIS and the One Seattle Comprehensive Plan in general

Warren Charles Dolan Jr
1220 NE 97th St
Seattle, WA 98115
chucklesd2@hotmail.com
206 683-5283

From: Jill Doran
To: PCD_CompPlan_EIS; LEG_CouncilMembers
Subject: Comment on DEIS
Date: Monday, May 6, 2024 3:10:17 PM

CAUTION: External Email

I am disappointed in the vague statements in this plan related to the protection of trees and wildlife in this city. Where are the data points and what is the plan for centering environmental protection and environmental justice into the future of our community? We know we're in a climate crisis. Protecting and increasing tree canopies is vital to combat this. We know we're in a mental health crisis. Being exposed to nature/trees regularly is vital to combat this. We know as a city we have prioritized easy/cheap builds over protecting the greenery that makes Seattle so unique compared to other cities.

I see first hand in my neighborhood mature trees that should be considered safe under current protections consistently removed to build new mega-sized homes. It is not enough to just replant trees and hope they make it. **183-1**

I've seen countless 'infrastructure improvement projects' that also kill mature trees instead of coming up with creative solutions to keep them.

The city needs a comprehensive plan that truly includes and centers saving mature trees. Growth and tree protection can go hand in hand. We are smart enough to figure this out.

Thank you for the work you all do for our city. I hope we can figure out how to keep our tree canopy not only intact, but growing.

Please note the following as comments on the DEIS:

1: Section P 3-3 states that "none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild." What is the impact of the plan specifically on Seattle's plants and animals?

2: Section P 3-3 states that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." What analysis shows that tree planting programs, coupled with increased hardscape, will compensate for lost urban forest?

3: The plan states that Seattle will make progress toward its 30% canopy goal. The new tree ordinance substantially reduces private land available for trees. How much public land is available to reach the 30% goal? How many trees will need to be planted in these areas every year to make up for trees removed by development?

Sincerely,
Jill Doran

Sent from my mobile device; please excuse brevity and errors

DEIS StoryMap Comment

Name: Barbara Downward

Email: lavender@mindspring.com

Date: 5/6/2024

Comment:

As a life long Seattle resident, long term Seattle Parks volunteer (retired), and home owner in the Magnolia neighborhood, I am pleased to make comment on the draft Comprehensive Plan. I retired from my nursing career early so I could devote more time to environmental restoration in Seattle Parks and the Western Washington region. That time was wonderful, and gave me an appreciation of our City and region that informs the comments to follow. Thanks for this opportunity.

1. Revise the climate and sustainability element to to become the climate biodiversity and sustainability element, acknowledging biodiversity as a goal of the comprehensive plan. While a park steward with the Green Seattle partnership at Lawton Park a few blocks from my home, I was privileged to witness the life cycle of Coopers hawks for years at the park. The hawks at Lawton fledged chicks every year from 2012 to 2023 and were studied and documented by the Urban Raptor Conservancy (URC)group who published their findings. It's hard to describe the thrill of encountering these birds at close range as I was privileged to do many times at Lawton Park- a 10 acre space adjacent to Lawton Elementary School where I often walked with my wheel barrel to work. URC has documented that urban hawks can thrive but face challenges that we here in Seattle can mitigate by acknowledging the value of wildlife and biodiversity. I urge you to protect and enhance the habitat quality of City owned property like parks, streets and undeveloped street right of ways that are often adjacent to parks.

2. Tree canopy (pp149-150) will be critical to Seattle's quality of life for people and wildlife. Reintroduce the timeline and stretch goal CE G12 to a tree canopy that covers at least 30% of the land by 2037 and 40% eventually. Page 3.3-5 states "Notably, most canopy loss was not associated with development activities; only 15 % of the canopy loss occurred on parcels that underwent development during that period" but a canopy change analysis from the Washington Department of Fish and Wildlife "determined that at a minimum, development or redevelopment of parcels in Seattle was the agent of change for approximately half of all tree loss that occurred between 2009-2017." The City's updated tree ordinance mentioned page 3.3-7 still needs revision to protect biodiversity in the City that is liable to decline.

3. Add a policy under LU G17 :"seek to increase both number and area of fish and wildlife conservation areas".

184-1

16th Avenue East
Seattle, WA 98112

May 6, 2024

By Email Only

Office of Planning & Community Development
City of Seattle
P.O. Box 94788
Seattle, WA 98124-7088
oneseattlecompplan@seattle.gov &
PCD_compplan_EIS@Seattle.gov

Re: *Comments to One Seattle Plan and EIS: 16th Avenue East and Other Infill Opportunities*

Dear OPCD:

Thank you for the opportunity to comment on the Draft One Seattle Plan ("Draft Plan") and the related Draft Environmental Impacts Statement ("DEIS"). This letter addresses a specific fact pattern on our block, which is no doubt relevant in many additional instances throughout the City. After providing initial background about the issues our block is facing, this letter provides recommendations to address these problems both for our block and for similarly situated blocks in many parts of the City. 185-1

Specifically, we request an upzone to better match adjoining blocks, as well as additional EIS analysis and text revisions to the Code and the Plan that would provide continued flexibility into the future.

The City's action on these recommendations would allow policymakers, staff, and the public to effectively respond to changing neighborhoods and needs in support of the Administration's and the City's policy goals.

A. Background: Unintended Consequences under Current Code.

We own (and in three of four cases, reside at) 415, 421, 425 and 431 16th Avenue E, APNs 4232400690, 4232400695, 4232400700 and 4232400706. These properties are mapped on the following page. As shown, they are zoned NR3, but immediately abut property zoned NC2P-55(M).

As you can see, our location on the easterly side of 14th Ave. E between E Republican Street and E Harrison Street benefits from excellent urban services, transit, and walkability. By all applicable metrics and under this Administration's policies and the One Seattle Plan, this location is an excellent place to provide additional housing density at market rents, affordable rents, or a mix.

This neighborhood is already dramatically changing around us. Immediately abutting our properties to the west, the City is evaluating a vested application for a six-story, 172-unit apartment building with retail and 102 parking stalls. We cautiously welcome the density, walkability and services

this development will provide, but it will create a jarring transition next to our homes. To allow adjustment to this transition and new transit-oriented density to be developed on this block, we request an upzone to LR3(M), to match properties to the north and south. Simply put, the Block's current Neighborhood Residential ("NR") zoning is outdated and is unnecessarily precluding the City and the block from valuable and badly needed additional housing capacity.

As shown in the attachments, one of us have previously conveyed such concerns to City decision-makers, with a request for action. However, the existing code retains outdated planning strategies that have prevented this block from providing the additional density it otherwise could, by prohibiting owner-driven upzones except in overly prescriptive and inflexible circumstances. *See* SMC 23.34.010.A[1] and 23.34.013.[2] While these policies may have been well-intentioned, in the context of a burgeoning housing crisis and pro-density residents, today they are clearly outdated.

B. Requested Map Change in Zoning Map and Future Land Use Map for Final One Seattle Plan ("Final Plan").

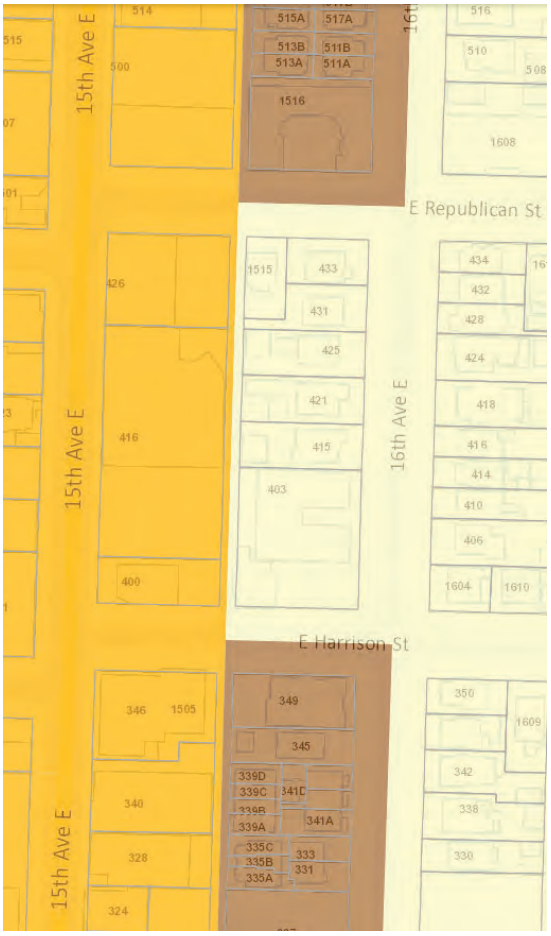


Figure 1. Current zoning of vicinity surrounding our homes. Light yellow properties are zoned NR3 and light brown properties are zoned LR3(M). Mustard yellow properties are zoned NC2-55(M), with a pedestrian designation in most circumstances.

For the reasons briefly covered in the previous section, the block's zoning is outdated, which artificially and unnecessarily suppresses the housing supply it could provide at its location in close proximity to excellent transit, urban services, and walkable commercial density. It also results in an uncomfortable and unnatural built environment where single-family houses stand in the shadow of a dramatic six-story building project that will likely result in a jarring transition as opposed to the wedding-cake model that is now known to be a best practice. We do not wish to oppose the neighboring project, but rather request an upzone so that our properties will be permitted to complement it with compatible degrees of infill residential density.

185-1 cont

[1] "Except as provided . . . single-family zoned areas may be rezoned to zones more intense . . . only if the City Council determines that the area does not meet the criteria for single-family designation."

[2] "An area zoned single-family that meets the criteria . . . may not be rezoned to multifamily except as otherwise provided in Section 23.34.010.B."

We understand that the proposed zoning map for the One Seattle Plan will be released in approximately July or August of this year. *We request that the map and the Mayor's Recommended Plan provide LR3(M) zoning to the westerly side of 16th Avenue E between E Harrison and E Republican, and correspondingly append this same area to the "Regional Center" designation that already adjoins us to the north and south.*

185-1 cont

This change would allow our block's zoning to match what is already located to the north and south, and to provide a less jarring transition between NR zoning (across the street from this location to the east) and NC zoning (across the alley to the west). The change would be consistent with multiple policies set forth by the Mayor, as contemplated in the Draft Plan, including most notably draft GS 6.2 ("Allow moderate-scale housing of 4 to 6 stories in areas . . . along arterials where zoned densities may be increased to provide more housing options near frequent transit").

C. Requested Policy Change in Final Plan, and Related Implementing Regulations.

In addition to applying NR3 zoning and Regional Center designation to the subject area, the Mayor's Final Plan should be updated to acknowledge existence of areas like ours, in order to allow such areas to not remain unnecessarily stuck for another planning cycle. At a minimum, these changes should be as bulleted below. These revisions would recognize that some Urban Neighborhoods are already very well served by urban services and appropriate for multifamily densities, and therefore may be suitable for low rise multifamily and other upzones in the future.

185-2

- At Page 27, "While some Urban Neighborhoods are not within walking distance of ~~lacking~~ the larger business districts located in centers . . ." and "By providing new options to add density, like middle housing . . ."

- At GS 6-2, "Allow moderate-scale housing of 4 to 6 stories in areas currently zoned for such housing and ~~along~~ in the near vicinity of arterials where zoned densities may be increased to provide more housing options near frequent transit."

- At Page 66, "It includes more low-scale housing options in Urban Neighborhoods across the city, and mid-scale options in parts of Urban Neighborhoods that are appropriate for greater densities."

Development regulations to implement the Final Plan should repeal SMC 23.34.010.A[3] and 23.34.013.[4] This is a needlessly inflexible rule that has kept areas like ours from appropriately responding to changing circumstances around them. This lack of flexibility is not consistent with the Mayor's vision for One Seattle.

Similarly, to implement the Final Plan, SMC 23.34.010.B.2.d should be revised to allow upzones if the proposed upzone is "[w]ithin or adjacent to a neighborhood center, regional center or urban center

[3] "Except as provided . . . single-family zoned areas may be rezoned to zones more intense . . . only if the City Council determines that the area does not meet the criteria for single-family resignation."

[4] "An area zoned single-family that meets the criteria of Section 23.34.011 for single-family designation may not be rezoned to multifamily except as otherwise provided in Section 23.34.010.B."

~~an urban village and the Comprehensive Plan Future Land Use Map designation is a designation other than Single Family~~." This code change would allow the Council, staff, owners and residents the flexibility needed to respond to changing circumstances as the City evolves. 185-2 cont

D. Requested Change in Final Environmental Impact Statement.

To enable maximum nimbleness in finalization and implementation of the Mayor's Recommended Plan both at the Council level and in future years, the Final Environmental Impact Statement should, in at least one of the Action Alternatives, *please study the addition of the easterly block of 16th Avenue E, between E Republican Street and E Harrison Street, to the adjoining Urban Center (titled a "Regional Center" under the Draft Plan).* 185-3

Additional textual changes could help maintain flexibility for future policymakers, from the Council down to planning staff. *Accordingly, we recommend additional textual changes in* ***Exhibit A*** *to this letter.*

Sincerely,

Doug Du Mas and Cherry Haisten

Doug Du Mas and Cherry Haisten (415 16th Avenue E)

Cristoph Siegert and Lindsay Talbot

Cristoph Siegert and Lindsay Talbot (421 16th Avenue E)

J. Toby Jessup and Catherine Costello

J. Toby Jessup and Catherine Costello (425 16th Avenue E)

Hui Ji and Weiyan Chen

Hui Ji and Weiyan Chen (431 16th Avenue E)

Enclosures

CC: Rico Quirindongo
Marco Lowe
Council President Sara Nelson (At-Large)
Councilmember Joy Hollingsworth (District 3)
Councilmember Tanya Woo (At-Large)
Councilmember Tammy Morales (Land Use Committee Chair; District 2)

APPENDIX A:

SUGGESTED EIS TEXT CLARIFICATIONS TO MORE CLEARLY ACKNOWLEDGE RESIDENTIAL NEIGHBORHOODS DIRECTLY ADJACENT TO CENTERS

185-3 cont

I respectfully suggest these text changes to the EIS, in order to allow the Council, staff, and property users greater flexibility to creatively respond to circumstances on the ground in future development and planning efforts.

- At 1-3, 1-11, and 2-34, "Housing in the urban neighborhood place type could include . . . stacked flats and sixplexes on larger lots and lots that are adjacent to more densely zoned areas."
- At 1-8, "Urban Neighborhoods represent primarily low-scale, ~~primarily~~ residential areas."
- At 1-65, "Non-stacked housing ~~refers primarily to~~ unit types are primarily expected to be built in Urban Neighborhood Residential zones."
- At 1-100 and 3.12-18, "For example, a greater degree of utility improvements may be required in many (but not all) urban neighborhood areas for multifamily development than in urban centers."
- At 2-3, "This place type would allow flexibility for new forms of housing in areas currently zoned primarily for detached homes, including stacked flats and sixplexes on larger lots and lots that are adjacent to more densely zoned areas."
- At 2.4-2, add a footnote to the "Urban Neighborhood" category indicating that "This EIS accounted for the possibility of additional height in Urban Neighborhoods on larger lots and lots that are adjacent to more densely zoned areas."
- At 2.4-34, "Market-rate development in most of these areas would continue to have a three-story height limit, consistent with current rules in Neighborhood Residential zones."
- At 2-54, in Ex. 2.4-33's third row, "Neighborhood residential: 30 ft in most cases"
- At 3.2-36 and 3.4-17, "Under Alternative 3, a wider range of low- and mid-scale housing options in urban neighborhood areas would be allowed, expanding housing choices and allowing additional housing options near existing parks and other amenities."
- At 3.6-14, in the lefthand column, under *Neighborhood Residential Areas*, "Neighborhood residential areas provide opportunities for detached single-family and other compatible

housing options that have low height, bulk, and scale in order to serve a broad array of households and incomes, and to maintain an intensity of development that is ~~appropriate for~~ responsive to areas with limited access to services, infrastructure constraints, fragile environmental conditions, or that are otherwise not conducive to more intensive development.

- At 3.6-14, in the righthand column, opposite *Neighborhood Residential Areas*, "• Neighborhood Residential (NR1, NR2, and NR3) and potentially Lowrise Multifamily (LR1, LR2, and LR3) to serve a broad array of households and incomes in appropriate areas that are conducive to such development." **185-3 cont**

- Footnote 1, "See Appendix G.1 for more detailed summaries of general zoning categories and overlay districts, respectively. Additional zones, beyond those listed here as "typical," may be appropriate in certain circumstances."

- At 3.6-145, "Alternative 3 would allow a wider range of low-scale housing options—like triplexes and fourplexes—in all urban neighborhood areas (see Exhibit 2.4-16) and could include stacked flats and sixplexes on larger lots and lots that are adjacent to more densely zoned areas."

- At 3.6-147, "Alternative 3 would allow missing middle housing types . . . in urban neighborhood areas, and potentially greater densities on larger lots and lots that are adjacent to more densely zoned areas."

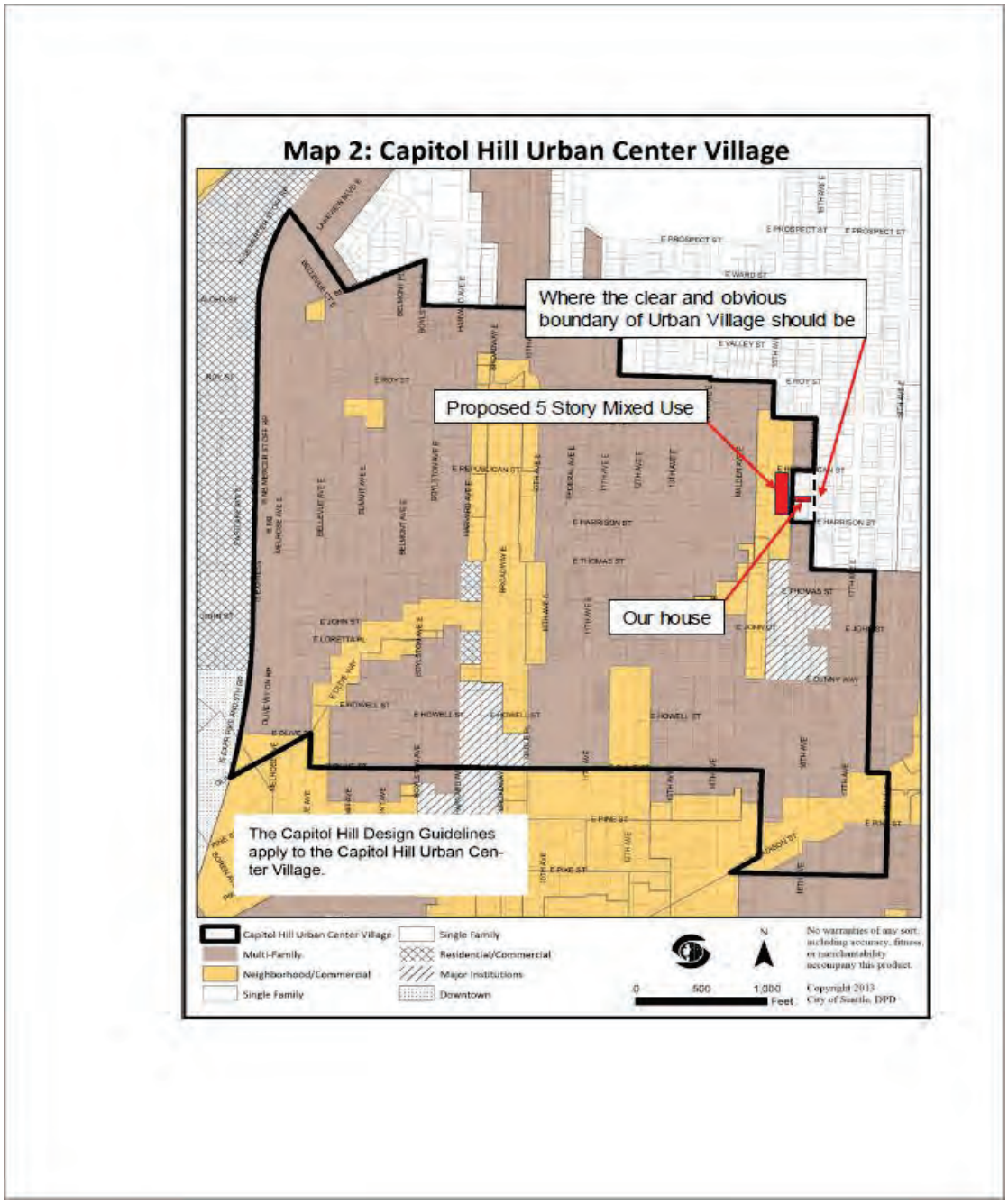
- At 3.6-162, "Similar to Alternative 2, urban neighborhood areas that are currently primarily 1- and 2-story buildings would be allowed to develop up to 4- to 5-story buildings, especially on larger lots and lots that are adjacent to more densely zoned areas."

- At 3.6-183, "Where middle housing is allowed in urban neighborhood areas, more properties may develop with 3-story (or 4-story if affordable) buildings adjacent to 1- and 2-story buildings, or to greater heights on larger lots and lots that are adjacent to more densely zoned areas."

- At 3.12-23, "The addition of multifamily homes of various sizes~~—duplexes up to sixplexes—~~ would likely require construction of new water and electrical service connections and potential upgrades to wastewater and drainage facilities to accommodate greater population and development density in many (but not all) cases, particularly in areas characterized by large-lot single-family zones.

APPENDIX B:

Illustrations previously transmitted to City officials with previous comments on this matter in April 2018 (in public comment and by written correspondence to CMs Sawant and Johnson) and February 2024 (by email to Michael Hubner, Nick Welch, Brennan Staley, Jim Holmes and Nathan Torgelson as well as Councilmembers Tammy Morales, Joy Hollingsworth and Dan Strauss).



185-3 cont

16th Ave East Housing block
These 6 houses are carved out of any rezone
Legend
415 16th Ave E
These six houses are the only single family zoned properties between Madison and Mercer on the west side of 16th Ave E.
Proposed Hunter Capital development. 55' height with underground parking via adjoining alley
The Gables multifamily Coop
415 16th Ave E
Google Earth
N
300 ft

185-3 cont

From: Phillip Duggan
To: PCD_CompPlan_EIS
Cc: Moore, Cathy
Subject: Seattle Comp Plan/130th Station Rezone Draft EIS
Date: Monday, May 6, 2024 2:37:51 PM

CAUTION: External Email

I like the combined plan but I still don't think it goes far enough. We still need more homes than that if we're to bring down the housing costs and putting them closer to light rail and transit makes sense. I'd also like to see more smaller-scale commercial accessible from neighborhoods and near transit centers. It would be nice to do shopping and daycare drop-off on the way to/from the train.

186-1

We specifically need more child care and locations for child care in the neighborhood though. The lot for Northgate Whizz Kids Academy (in Pinehurst) is currently for sale and they have had trouble finding other suitable locations nearby.

Thanks,
Phillip

Letter 187

May 6, 2024

VIA EMAIL

Office of Planning and Community Development
Seattle City Hall
600 4th Avenue, 5th Floor
Seattle, WA 98104
Attn: Jim Holmes
PCD_CompPlan_EIS@seattle.gov

Re: Support for Alternative 5 and additional height and density studied in small parcels zoned NC-55 to encourage development and create a workable Mandatory Housing Affordability program.

Dear Mr. Holmes,

Thank you for the opportunity to provide feedback on the One Seattle Comprehensive Plan Draft Environmental Impact Statement ("DEIS").

I am an owner/partner of four sites currently zoned NC-55, at 2514, 2518 and 2616 East Cherry Street and 533 26th Avenue in the Central District neighborhood (District 3). 2514 and 2518 East Cherry Street are each 40 feet wide and 100 feet deep. 2616 East Cherry is 45 feet wide and 60 feet deep. 533 26th Avenue is 100 feet wide and 100 feet deep. These properties are typical of many small/shallow NC-55 sites around the city. Many of these parcels belong to longtime property owners, often families or owner-users, who do not have development or land use expertise. My own awareness comes from having started the redevelopment process on two of these parcels before the MHA legislation went through, and then having to rush to get that process vested to NC-40 in 2019 when I realized the devastating negative impact that the MHA formula would have for these sites. 187-1

While I was a proponent of MHA generally, the warnings that we gave to Councilmembers and Staff about the MHA changes to what were NC40 sites, prior to the adoption of the Citywide MHA program, have come true. The MHA payments have terribly diminished the existing value of this category of sites and made any new units that could be developed under MHA much more expensive than they previously were. In short, MHA has been a success in some zones, but in NC-55 zones (formerly NC-40), the program has been a disincentive to housing development. As such, I urge OPCD to study several policy suggestions outlined later in this letter.

First though, a reminder of why formerly NC-40 sites were always challenging, and therefore why the MHA changes tipped them from being challenging to infeasible, depressing housing creation and MHA fees in the NC-55 zones:

1. These sites are often on smaller commercial streets and tend to be relatively small and shallow, because they were historically zoned to reflect and/or encourage a shallow row of retail "liner" buildings in otherwise residential neighborhoods.

2. As such, they typically back up to immediately adjacent LR and NR zones, with no separating alley, and are therefore subject to a 15-foot setback at all the residential floors (i.e. above 13 feet). This condition can be found not just along East Cherry but, as just a few further examples, along the north side of Yesler in the CD, the west side of 15th Avenue on Capitol Hill, and the east side of 34th Avenue in Madrona.
3. The setback is very impactful on these shallow sites. At 2616 East Cherry, for example, the 15-foot setback removes 25% of the residential floor area. This means that the proscribed 3.25 FAR barely fits (and only if the ground floor is built to the back lot line with a blank wall). It also means that the stairs/elevators/hallways of a new building take up an inordinate amount of the floor plate relative to actual living space.
4. As NC-40 sites had started to be redeveloped around the city prior to 2019, a saving grace was that their four-story height didn't necessarily demand an elevator; and some innovative developers were choosing to do these as walkups (e.g. Pax Futura in Columbia City). This saved valuable FAR from being consumed by the elevator shaft and circulation space around it, and also saved $150k or more in purchase price for an elevator, and thousands more per year in annual operating expenses, improving both the feasibility of these sites and the affordability of the units. Unfortunately the fee payments that came with the MHA upzone subtracted mightily from the economic viability of this solution.

187-1 cont

MHA gave these sites an additional 0.5 FAR and an extra floor of height (from NC-40 to NC-55) but as illustrated by the points above, there is no practical way to use it. The 15-foot setback means that the four stories are already completely filled out. Going to five stories in order to capture 0.5 FAR on a small site is ENORMOUSLY expensive and inefficient. Market wisdom dictates that five floors necessitates an elevator, which along with the two stairs, circulation space, trash room/shaft easily consumes 600-800 SF per floor. On a site like 2514-2518 East Cherry, of the 4,000 SF in additional FAR, up to 25% of the additional floor would be consumed by common area. On an even smaller site like 2616 East Cherry (even with one stair serving less than four units per floor), a third to a half of the additional 1,350 SF in FAR would be consumed by the common area. In both cases, the enormous costs of adding an elevator and the building skin for an additional floor would far outweigh the finished value of the meagre additional living space created, and this is even BEFORE the costs of paying the MHA fees.

I am suggesting a multi-part solution for NC-55 sites that could be selectively applied to sites that directly abut residential zones and are less than 120 feet deep or 10,000 SF total:

1. Increase the FAR so that a full fifth story is possible on these sites, meaning a full 5.0 FAR. While this is likely not always useable due to need for windows, light and air, it would make these small sites useable to the five stories that the zoning intended.

2. Reduce the frequency of NC-zoned sites abutting neighborhood residential zones, and rezone the "back half" of these NC blocks from NR to NC. The City should work to eliminate these impactful transitions where NC zones abut NR directly or across an alley. Please study in the DEIS options that eliminate these transitions. The DEIS discloses that transitions in scale may be an issue in all alternatives, but the best way the City can mitigate this is to eliminate these awkward transitions altogether.

3. Study in the DEIS the elimination of upper-level setbacks when these transitions do occur in order to prioritize housing development. Eliminating upper-level setbacks will allow the full FAR to be utilized in these zones. The OneSeattle Plan's main goals revolve around increasing housing choices and expanding housing opportunities across the City. Whole swaths of the NC-55 zones

have been underdeveloped because of the combination of too-low FAR and these setbacks that are "protective" of neighborhood residential zones. As you are aware and the DEIS discloses, neighborhood residential zones have been "protected" for years "from" development in a manner that has been highly inequitable and exclusionary. Please consider whether protective setbacks of neighborhood zones is indeed an equitable solution.

187-1 cont

Thank you for considering my input and please do not hesitate to contact me should you have any questions.

Sincerely,

Liz Dunn
Dunn & Hobbes, LLC
www.dunnandhobbes.com
206-324.0637

Letter 188

From: Ivy Durslag
To: PCD_CompPlan_EIS
Cc: LEG_CouncilMembers
Subject: DEIS Comments and Questions re One Seattle Draft Plan
Date: Monday, May 6, 2024 10:10:11 AM

CAUTION: External Email

City of Seattle Staff:

I have the following questions regarding the DEIS for the Draft One Seattle Plan.

1. Current and proposed alternative setback requirements for multi-family dwellings of all types on arterials do not allow adequate space for both pedestrian access and adequate and substantial tree canopy. Residents of units facing those arterials therefore have no or inadequate buffers from noise pollution, air and particulate pollution, and heat island effects along these corridors due to lack of shade and inadequate carbon absorption. So-called affordable housing is almost universally proposed to be along these arterials, and lower income households will suffer the greatest effects. The DEIS states "major policy updates" can mitigate some effects of increased density and population. **Please provide your analysis of increasing the threshold building setback requirements on arterials for each of the alternatives, with supporting data and research. How much of Seattle's tree canopy deficiency can be met with street trees? With policy updates regarding setback requirements, how much could be met, and what would those policy requirements need to be, given the Plan's apparent reliance on street trees to provide mitigation?** 188-1

2. **What is the supporting data and research behind the DEIS assertion that "No significant unavoidable adverse impacts to air quality and greenhouse gas emissions are anticipated."** 188-2

5. Multiple neighborhoods in Seattle that are within both urban cores and urban neighborhoods, along with substantial buffer zones alongside those cores, and that are expected to absorb a substantial amount of increased units, do not have sidewalks. Greenwood north of N 85th St is one such area. The plan is designed to increase walkability, however safe walkability is not possible without sidewalks. **How much of Seattle's development under each of the alternatives is in areas currently without sidewalk? What data and research do you have regarding the walkability for areas currently without sidewalks, and the number of miles of sidewalk needed in order to meet a minimum standard of walkability?** 188-3

6. **What plans does the City have to add parks in areas with heavy concentration of** 188-4

apartment buildings? What land does the City intend to buy for this purpose? How many acres would this need to encompass? How many trees would need to be planted in these parks to mitigate tree loss on other parcels?

188-4 cont

7. When no parking is provided for private automobiles in order to encourage use of public transportation, grocery stores must be within walkable distance from population centers. Approximately one supermarket is required for every 10,000 residents. As has been well-publicized, numerous supermarkets have closed around the city due to consolidation in the grocery industry. Current apartment development along the Aurora corridor and in the Duwamish Valley, for example is occurring outside the range of walkability to a supermarket, and will increase city-wide under any of the alternatives. **What is the number of supermarkets that will be required to support increased density in each zone? What location, within a range, will these supermarkets need to be in, and what is the availability of land or structures for them? What incentives will the city need to provide in order to lure supermarkets back into the city in an amount sufficient to meet the development need, and for developers to put aside ground-level units for supermarkets?**

188-5

8. **What is the anticipated family size of Seattle's population in the next 20 years? To what extent will family size differ by income, ethnicity, race, or other family background? To what extent will the standard of two bedrooms as the criterion for a family-sized unit meet the need of Seattle's families? To what extent will two bedrooms as family size provide equity? Please provide supporting documentation.**

188-6

9. **Working parents with children need daycare even for school-aged children. How will Seattle's anticipated transportation pattern, using the bus and rail system that is available only in major corridors, enable parents to get children to and from daycare and still get to their employment on time, considering that multiple parents will not work on direct buslines? How will this transportation and overall land use allow daycares to afford rent in sufficient areas of the city to meet the need? Please provide supporting documentation.**

188-7

10. **To what extent will Seattle's future housing be stair-free and suitable for seniors? Please provide supporting documentation.**

188-8

11. The DEIS states, "Given that habitats in the city limits represent a very small proportion of the total amount of habitat available to any species, differences in the availability or distribution of habitats in the city would be unlikely to result in any appreciable impacts on regional populations of plants or animals." *Yet development and population growth is expected to be statewide*, in fact has been encouraged by HB 1110, and is certainly occurring with accelerating speed in King, Snohomish, and Pierce Counties. The DEIS

188-9

has simply skirted this issue, which is unacceptable. This is a DEIS about a plan for Seattle, and ***Seattle has a responsible and key position within the region that cannot and should not be abdicated***. **What is the supporting documentation, including data and research, showing the impact on plants and animals of development <u>in Seattle proper</u>?**

188-9 cont

12. The DEIS states, "none of the action alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." Supporting data and research is not provided. **What would be the potential loss of tree canopy, in acreage, with increased development and density in each alternative, over each of the successive five year periods?**

13. **What impact on tree canopy loss would modification of the basic tree protection area have, for each of the alternatives, over successive five year measurement periods?**

14. **How many trees would need to be planted, and over what period of time, to replace trees and tree canopy (number of trees, size and volume of canopy) lost to development in each of the five alternatives? How many acres and how many privately owned parcels would this require?**

15. **What heat island effects would occur in the interim between planting and sufficient maturity to replace existing canopy and canopy lost over the past 20 years?**

16. **What kinds---species and varieties--- of trees would need to be planted to provide suitable nesting and food for urban birds to compensate for trees lost to development? How many such trees would be needed to maintain the current urban bird population? How long would it take for those trees to reach a size capable of providing habitat?**

17. **What is the available acreage available to plant trees on private property?**

18. **As noted above, what building setback requirements would be needed to enable street tree planting to occur sufficiently, with sufficiently large trees with sufficient volume and canopy, to compensate for tree loss due to development?**

19. **When will it be possible to reach the 30% tree canopy citywide goal**? **What would the 20 year climate change and heat island impact be of Seattle abdicating its role in maintaining a minimum tree canopy of 30%?**

20. **What potential is there for more than 30% tree canopy in Seattle over time? To what**

extent is 40% canopy coverage possible over time as proposed in the previous Comprehensive Plan possible, under each of the alternatives?

21. **Canopy volume, especially of coniferous trees during our rainy season, are critical factors in reducing stormwater runoff. What is the projected loss in canopy volume over the next 20 years as big conifer trees are removed?**

188-9 cont

22. **What is the projected increase in stormwater runoff and what costs are associated with on-site and alternative city water management policies of stormwater and pollutant runoff as a result?**

188-10

Respectfully submitted,

Ivy Durslag
512 N 82nd St
Seattle, WA 98103
206-353-7265

Letter 189

From: Ivy Durslag
To: PCD_CompPlan_EIS
Cc: LEG_CouncilMembers
Subject: Comments on One Seattle Comp Plan Draft
Date: Monday, May 6, 2024 1:05:17 PM

CAUTION: External Email

I write in agreement with comments posted by Friends of Seattle's Urban Forest, to wit: "The following comment is in regards to legislation passed last year on Comprehensive Plan requirements

1. In the Climate and Environment Section, p 149, of the draft One Seattle Comprehensive Plan, the heading **Tree Canopy**, should be changed to **Urban Forest and Tree Canopy.**
2. Discussion - Seattle's **urban forest** and tree canopy is fundamental...

Rationale for adding urban forest is legislative amendments noted in text below. Highlighting is from Friends of Seattle's Urban Forest, for pointing out specific sections. Underlined areas are new to the 2023 legislation.

The Washington State Legislature in 2023 passed E2SHB 1181 - AN ACT Relating to improving the state's climate response through updates to the state's planning framework.

189-1

Section 1.(14) Climate change and resiliency. Ensure that comprehensive plans, development regulations, and regional policies, plans, and strategies under RCW 36.70A.210 and chapter 47.80 RCW adapt to and mitigate the effects of a changing climate; support reductions in greenhouse gas emissions and per capita vehicle miles traveled; **prepare for climate impact scenarios; foster resiliency to climate impacts and natural hazards; protect and enhance environmental, economic, and human health and safety; and advance environmental justice. ...**

Section 3.(3) The comprehensive plan of a county or city that is required or chooses to plan under RCW 36.70A.040 shall consist of a map or maps, and descriptive text covering objectives, principles, and standards used to develop the comprehensive plan. The plan shall be an internally consistent document and all elements shall be consistent with the future land use map. A comprehensive plan shall be adopted and amended with public participation as provided in RCW 36.70A.140. Each comprehensive plan shall include a plan, scheme, or design for each of the following: (1) **A land use element designating the proposed general distribution and general location and extent of the uses of land, where appropriate,** for agriculture, timber production, housing, commerce, industry, recreation, open spaces **and**

green spaces, urban and community forests within the urban growth area, general aviation airports, public utilities, public facilities, and other land uses. The land use element shall include population densities, building intensities, and estimates of future population growth. The land use element shall provide for protection of the quality and quantity of groundwater used for public water supplies. **The land use element must give special consideration to achieving environmental justice in its goals and policies, including efforts to avoid creating or worsening environmental health disparities.** Wherever possible, the land use element should consider utilizing urban planning approaches that promote physical activity and reduce per capita vehicle miles traveled within the jurisdiction, but without increasing greenhouse gas emissions elsewhere in the state. **Where applicable, the land use element shall review drainage, flooding, and stormwater runoff in the area and nearby jurisdictions and provide guidance for corrective actions to mitigate or cleanse those discharges that pollute waters of the state, including Puget Sound or waters entering Puget Sound.** The land use element must reduce and mitigate the risk to lives and property posed by wildfires by using land use planning tools, which may include, but are not limited to, adoption of portions or all of the wildland urban interface code developed by the international code council or developing building and maintenance standards consistent with the firewise USA program or similar program designed to reduce wildfire risk, reducing wildfire risks to residential development in high risk areas and the wildland urban interface area, separating human development from wildfire prone landscapes, and protecting existing residential development and infrastructure through community wildfire preparedness and fire adaptation measures.

189-1 cont

2nd change - In the Land Use Element General Development Standards:
Policies L.U.4.8 add underlined words.

Urban forest and tree requirements to preserve and enhance the City's physical, aesthetic and cultural character and to enhance the value of the trees and urban forest in addressing stormwater management, pollution reduction, climate resiliency and heat island mitigation."

Respectfully submitted,
Ivy Durslag
512 N 82nd St
Seattle, WA 98103
206-353-7265

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DEIS StoryMap Comment

Name: Anne Dwyer

Email: dwyer.ankr@gmail.com

Date: 5/5/2024

Comment:

The city should study the impacts of expanded highrise zoning in urban and residential neighborhoods. Of the available alternatives, I strongly prefer Alternative 5 with higher growth targets.

190-1

Letter 191

From:	Elizabeth Edlund
To:	PCD_CompPlan_EIS
Cc:	Strauss, Dan
Subject:	Seattle"s Comprehensive plan and tree canopy: choose alt 2 or 4
Date:	Saturday, May 4, 2024 12:49:09 PM

CAUTION: External Email

I am a resident of Seattle, District 6, and I am concerned with our diminishing tree canopy and the proposed comprehensive plan's impact on tree canopy.

Tree canopy isn't just nice, making Seattle "pretty" and "The Emerald City" in name only. Tree canopy provides essential cooling in our warming climate and increasingly paved city. Trees provide vital habitat for urban wildlife which, for me, is a major reason to live here. 191-1

Specifics of the plan I'd like to address are:

The plan states that Seattle will make progress toward its 30% canopy goal. The new tree ordinance substantially reduces private land available for trees. How much public land is available to reach the 30% goal? How many trees will need to be planted in these areas every year to make up for trees removed by development?, and how much of that land can even support additional trees to replace being lost on private land?

Section P 3-3 states that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." Can you point to specific analysis which shows that tree planting programs, coupled with increased hardscape, will compensate for lost urban forest? If this analysis has not yet been done, why not?

Section P 3-3 also states that “none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild.” This is very vague and, frankly, sounds quite improbable. What, exactly, is the impact of the plan on Seattle’s plants and animals?

I feel that there is an implication here that we do not need urban nature. I strongly disagree. We absolutely do need urban nature and urban forests. Not everyone who lives in Seattle has the ability to get outside the city for "more wild" nature. Urban nature is essential to our quality of life for innumerable reasons including, but certainly not limited to:
1. Human mental and physical health. (Countless studies show a positive correlation between even short walks in areas with sufficient tree canopy tp positive physical and mental health benefits such as lower blood pressure and lower levels of anxiety.
2. Mediating effects of climate change by providing shade, clean air, and retaining moisture.
3. Urban nature simply deserves to exist for its own intrinsic value.

I ask you to choose either alternatives 2 or 4 in the comprehensive plan so we can build 100,000 new homes while preserving our trees. The state of our tree canopy my seem like a small thing but I believe it is very important

Thank you for considering,
Eli Edlund
9917 15th AVE NW
Seattle 98117

Letter 192

From: Sara Elaine Eldridge
To: PCD_CompPlan_EIS
Cc: Moore, Cathy; Sara Elaine Eldridge
Subject: 3 Critical Questions, for our environmental impact statement, please?
Date: Thursday, May 16, 2024 12:52:08 PM

CAUTION: External Email

First
Regarding Section P3-3: We need more scientific research that clearly lays out what impacts of the Plan would be SPECIFICALLY for Seattle's animals and plants. We have to have these factual projections clearly stated for citizens to understand consequences. We must know as clearly as possible, BEFORE we take irreparable actions, making expensive choices that may not be able to be corrected.

Second
For Section P3-3: Do we have a concrete, factual analysis that demonstrates that tree planting programs, to include additional hardscapes, will scientifically serve us as sufficiently as the urban forests that are proposed for destruction?

Third
With private land available for trees measurably reduced by this new tree ordinance, which public lands will be used to get Seattle to the stated 30% canopy goal?
What are the specific plans for how much public land and the number of trees to be planted EACH Year in compensation for the destruction of tree canopy by development, please?

192-1

Thank You All for taking these issues under your consideration and into the public debate.

Thank You for your work to make our world livable into the future,
Sara Eldridge
--
Sara Elaine Eldridge
"Of all **the** forms of **inequality**, **injustice** in **health care** is **the** most shocking and inhumane."
Dr. Martin Luther King Jr.

Letter 193

From: mike eliason
To: PCD_CompPlan_EIS
Subject: comp plan comment
Date: Monday, May 6, 2024 5:03:02 PM

CAUTION: External Email

In reviewing the comprehensive plan update, I have noted there are 4 overarching oversights that must be addressed if we are to be a city that actually prioritizes public health, affordability, reversing gentrification, meeting our climate goals, and ensuring a high quality of life for all residents. These oversights are:

193-1

1. the plan does not do enough to redress the harm and poor outcomes stemming from Seattle's racist and classist land use regulations.

2. the plan does not do enough to address broad housing affordability crises in the city.

3. the plan does not center climate adaptation in the middle of a worsening climate crisis.

4. the plan is not coordinated with the Seattle transportation plan and levy, nor commits to a transformative turnaround in any timeline that matters

Redressing Seattle's racist land use policies

Seattle's land use ordinance was written by Harland Bartholomew, an urban planner hired by the city in 1921, whose views on cities, renters, and people of color was decidedly negative. In Color of Law, Richard Rothstein notes that Bartholomew was a zoning expert in St. Louis, whose ordinance for that city was intended, 'to "preserv[e] the more desirable residential neighborhoods," and to prevent movement into "finer residential districts … by colored people." Concurrent with writing Seattle's zoning ordinance, Bartholomew was working one for Memphis. According to Roger Biles in 'Memphis: in the Great Depression,'

> *'While it sought to demarcate areas of industry, commerce, and residence, the ordinance additionally reflected the desire of the elite to maintain existing patterns of racial segregation… Recognizing that these informal boundaries might shift or that a growing black population might spill over into heretofore white neighborhoods, the strict application of zoning laws, particularly having to do with dwelling standards, went a long way toward preserving the exclusivity of white enclaves.'*

The outcomes in Memphis were the same in Seattle. The zoning map was effectively a snapshot of existing land uses. Poor areas and neighborhoods primarily with people of color were zoned for multifamily housing, with single family zoning around them to restrict movement. Our zoning map today ensures that Bartholomew's racist views still affect how the city grows and changes. The Urban Village strategy merely doubled down on Bartholomew's map and ordinance, effectively keeping the original 1923 zoning ordinance intact – and focusing more development in areas where multifamily zoning and density were *already* legal – increasing displacement and gentrification. The policies of the Urban Village strategy were both racist and incredibly classist – loaded with pernicious anti-tenant policies, and eliminating

affordable housing. Various neighborhood planning documents, that were largely dominated by homeowners in areas that are primarily renter, include numerous classist policies.[1]

These include statements and goals about preserving single family zoning over all other forms of housing in Urban Villages and areas slated for density, and limiting zoning expansion or increases.

193-1 cont

Goal 5 - housing which conforms to the existing single-family character of the neighborhood for a range of incomes. Strive to protect the integrity of the single-family housing stock. Green Lake's plan includes this classist gem: 'the Green Lake community believes that the neighborhood already contains much of the low-income housing that exists in Seattle.

Green Lake's plan also explicitly called out limiting low-income housing, and channeling growth along arterials. Greenwood's plan eliminated 32 blocks of multifamily housing, limiting all new density to a half block depth off the freight routes of 85th and Phinney/Greenwood. As a result of these Urban Village planning documents = plans, the goals and objectives have been refined to encourage moderate income housing. Ravenna, Bryant, Wedgewood and Maple Leaf–which also had small neighborhood centers, great parks, good schools, and access to incoming high capacity transit – all avoided Urban Village designation… One wonders why that could have been…

This is why it was important that former Council Member Mosqueda pushed for the Urban Village strategy to undergo a racial equity analysis[2] - a report OPCD and the mayor's office delayed and have ignored. There was never an analysis for the 1994 comprehensive plan.

Throughout the One Seattle engagement – Seattle residents have overwhelmingly asked the city to step up and study a plan that not only redresses the harms of Bartholomew's racist zoning ordinance – but to go further. The overwhelming number of comments were to adopt Alternative 5, or to go even further with an Alternative 6 – pivoting towards a more equitable, social, and sustainable city with a focus on inducing significantly more affordability and social housing.[3]

For some reason, all of that engagement was ignored or tossed out – as the mayor's comprehensive plan update is little more than Alternative 2 and continues to double down on the racist and classist roots of Seattle's zoning history. For all the mayor's talk about affordable housing and equity – opting to preserve an inequitable and unsustainable status quo instead of an alternative that would increase most affordable homes is incredibly disappointing.

Prioritizing urbanism and affordable housing.

Per OPCD's own EIS, ***only Alternative 5 maximizes the number of affordable homes***.

193-2

While it was not good policy from an urbanism, housing affordability, or public health standpoint – the plan's complete elimination of **Alternative 4 – Corridors** is

confounding. What makes walkable cities… walkable – is that density and midrise buildings are allowed for several blocks off of arterials. This plan would have allowed for multifamily and affordable housing off of dangerous, toxic and loud arterials.

The district maps show that the new neighborhood centers are largely centered on arterials and freight routes.

193-2 cont

This plan flies in the face of HB1110 – and the authors have rightfully called out the inadequacy of it. The entire Neighborhood Residential section needs to be re-formulated so that the FAR and setbacks are functional for the development of 4-6 unit family sized homes. The proposed FAR of 0,9 is laughably inadequate – much like this plan.

The EIS also states that Alternative 5 is the greatest opportunity for more affordable housing: '***Alternative 5 provides the greatest capacity for housing to meet affordability***… ***Alternative 5 would result in the largest increase in housing supply and therefore have the greatest impact on reducing overall market housing cost pressures for both new and older units***.'

With the EIS showing that project new affordable units through MHA would occur in Alternative 5 (Exhibit 1.6-15) – and by nearly 25% increase. With housing production tanking, it is more imperative than ever to prioritize and facilitate more affordable housing.

EIS also states, '***Alternative 5 would provide the greatest benefit for low-income renter households among all alternatives due to its impact on increasing rental housing supply and new affordable housing through MHA and MFTE.'***

In the EIS Exhibit 1.6-21 Population, Housing & Employment Summary of threshold significance – only Alternative 5 shows positive impacts for nearly across the board – increases the supply of market rate housing, affordable housing, diversity of market rate housing, the supply of income-restricted housing, and reducing economic displacement.

Alternative 5 is also the only alternative studied that would reduce growth pressure on Southeast and Central Seattle: '***Most housing growth would be in Northwest & Northeast Seattle (Areas 1 and 2) followed by Downtown/South Lake Union (Area 4)*** '

In looking at regional effects of the comprehensive plan update – which has the greatest potential for reducing WA's carbon emissions and meeting climate goals, the EIS states '***Among all of the alternatives, however, Alternative 5 offers the highest amount of new housing in the city, which would deter housing growth in the region beyond the city. Based on this, Alternative 5 could indirectly avoid adverse impacts to some of the most pristine water resources throughout the region, as described under Impacts Common to All Alternatives***.'

Prioritize and study the effects of enacting a more visionary, climate forward, and social housing-laden comp plan.

Centering Climate Adaptation:

Under the Equity & Climate Vulnerability Considerations – the most important I consideration s missing: the majority of new apartments in Seattle CANNOT utilize passive cooling or night purging because they are single aspect units in double loaded corridors. The city also don't have incentives for active solar protection (operable shading), making climate adaptation near impossible.

193-3

A climate-forward plan would prioritize thinner buildings with single loaded corridors and point access blocks (single stair buildings) to allow more units that can cross ventilate.[4] The preponderance of double loaded corridors in buildings is a massive policy and public health failure – especially in the face of future heat domes (units stayed well above 90F in new construction during the previous heat dome).

Thinner buildings would also allow for more land on lots to prioritize broadening the tree canopy in urban areas where it is needed most. Vienna's Sonnwendviertel shows how this is achieved.

Multifamily housing must also be positioned off toxic and dangerous arterials for this same reason – opening up opportunities for more affordable housing near parks which tend to be much cooler due to urban heat island mitigation.

Public Health

Study effects of allowing more affordable housing off of arterials. Noise pollution causes way more issues than just annoyance and hearing loss – it is linked to cardiovascular issues, and more recently dementia[5]

Study effects of lush, family-friendly, car-light and car-free districts around light rail, such as Freiburg's Vauban, or Vienna's Sonnwendviertel.

Alternative 5 is the only plan that has better social impacts – stating, '***Alternative 5 would likely have overall positive impacts on social wellbeing and social interactions.'***

Transportation

Under the visionary leadership of an actual climate leader, Paris under Mayor Anne Hidalgo has seen a 45% drop in car ownership since 1990.[6] This plan needs to be better coordinated with the Seattle Transportation Plan, which itself is completely inadequate to facilitate the mobility transition, or adapt to a changing climate.

193-4

The DEIS states that the action alternatives are expected to result in higher vehicle miles traveled (VMT) than the No Action Alternative due to increased growth levels. The impact analysis also states that all the action alternatives are expected to have significant impacts to transit passenger load, corridor travel time, intersection level of service in the NE 130th/NE 145th Street Subarea, and state facilities. The proposed mitigation measures include targeted transportation capacity improvements; bicycle, pedestrian, and freight connections; and demand management using policies,

programs, and investments aimed at shifting travel to modes other than single occupant vehicles. While we are supportive of these mitigation measures, we would like more information on whether these mitigation measures are consistent with those proposed in the STP.

193-4 cont

"We must shift our thinking away from short-term gain toward long-term investment and sustainability, and always have the next generations in mind with every decision we make."

I wanted to end with this perfect quote from US Department of Interior Secretary Deb Haaland, because it absolutely summarizes the thinking that should be inherent in the comprehensive plan. We should have a mayor that prioritizes future generations. We should have a comprehensive plan that prioritizes the fact that the majority of residents both now, and in the future – are not homeowners, but renters. And ensures everyone – not just the wealthy and those who were able to buy 'affordable' detached homes decades ago – the opportunity for high quality of life, climate adaptive homes, and affordable housing. Unfortunately, this mayor and OPCD have opted not to do this. They have opted to prioritize climate arson over climate action. To prioritize homeownership over social and affordable housing. We must shift our thinking away from short term gains, to ensure the sustainable, livable, and affordable city with future generations in mind. There is a lot of work that needs to be done to ensure the comp plan is not a complete failure – and I really hope, both for our sake – as well as my own kids, and future generations – you all take that responsibility seriously.

Thank you,

Michael Eliason

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[1] How Seattle Designed Neighborhood Plans to Inhibit Inclusivity: Part 2, Mike Eliason, https://www.theurbanist.org/2019/10/17/how-seattle-designed-neighborhood-plans-to-inhibit-inclusivity-part-2/

[2] Racial Equity Analysis of Seattle 2035 Comprehensive Plan and Urban Village Strategy, https://aiaseattle.org/wp-content/uploads/OPCD-RacialEquityAnalysis-Memo-and-attachemnts_LUNcmte_071421.pdf

[3] One Seattle Comprehensive Plan Update Environmental Impact Statement (EIS) Scoping Report, https://www.seattle.gov/documents/Departments/OPCD/SeattlePlan/OneSeattlePlanEISScopingReport.pdf

[4] Point Access Block Policy Brief, Larch Lab. https://www.larchlab.com/point-access-block-policy-brief/

[5] Exposure to traffic noise linked to higher dementia risk, Kelly Bilodeau.

https://www.health.harvard.edu/mind-and-mood/exposure-to-traffic-noise-linked-to-higher-dementia-risk
[6] Cars Are Vanishing from Paris, Peter Yeung. https://reasonstobecheerful.world/cars-are-vanishing-from-paris/

Letter 194

From: Richard Ellison
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 4:57:56 PM

CAUTION: External Email

Comments Planning and Community Development EIS,

TO: The Seattle City Council
RE: Seattle Comprehensive Plan DEIS
DATE: May 6, 2024

194-1

COMPREHENSIVE PLAN HISTORY
One of the four core values of the Seattle Comprehensive Plan is Environmental Stewardship. This has been a core value for decades of Seattle Comp Plans.
Previous Comp Plans said:
"The Seattle Comprehensive Plan calls for Seattle to continue to be a national leader in environmental stewardship. Even as the city becomes increasingly urban, Seattle is dedicated to protecting and restoring the green spaces and water that make our city special."

• "To Design, build, and manage the City's built environment in ways that protect, and strive to restore, …natural resources and natural systems;
• Act as a role model … in environmentally sustainable practices;
• Improve the overall quality of life in Seattle."
"The overarching goal of this Comprehensive Plan is to promote sustainable development – through a smart and well-integrated approach to where and how we grow."

NEW TREE ORDINANCE IMPACTS
In MF zones with 100% lot coverage allowed, it may be impossible to save any existing large or medium sized tree on a lot, and also many adjacent street trees.

For the EIS for Accessary Dwelling Units, the City compared canopy cover on lots that had undergone development. The found representative sample lots and compared canopy coverage before and after using LIDAR. The current DEIS for the comprehensive plan does not calculate canopy cover changes on potential lots in zones for the 5 Alternatives. Instead it wrongly assumes the new tree ordinance will protect trees similarly or better than the previous ordinance did. This wrong assumption will have potential long and short term significant impacts because mitigation opportunities will be lost as no proper evaluations of impacts has occurred to push for greater mitigations.

Exhibit 3.3-3. Total Area and Proportion of Tree Canopy Loss on Parcels That Underwent Development, by Management Unit, suggests that under the new tree ordinance, on NR lots, at the desire of the developer they are allowed to remove all trees on an approved development lot. Thus this will mimic current MF lots in regards to measured canopy's lost.
Neighborhood Residential = 19% of the parcels canopy cover lost

Multifamily = 75% of the parcels canopy cover lost

Table 3.3-3 shows that a shift from “NR” toward “MF” will result in a much higher rate of canopy loss due to development. IMO, this shift (not quantified by the EIS in acreage of land or canopy cover) could well be a “significant unavoidable adverse impact,” contrary to the conclusion on p. 3.3-30 based in good part on “the City’s current tree protection regulations minimize the potential for development-related loss of tree canopy cover and require mitigation for such tree loss.”

194-1 cont

The new tree ordinance does not protect trees under development. It only protects trees on NR parcels NOT undergoing development. Parcels undergoing development can have even Exceptional trees be removed if they will reduce the development potential of a lot. The decision is according to the developer; it’s not the City’s decision. The City only issues the permit which then allows the tree removal.

The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.

The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover."

No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

OPEN SPACE AND WILDLIFE
While we have a terrible need for affordable housing, everyone needs a livable community, including trees in open spaces for families and native wildlife. Without big trees, without real open space, where are the kids going to play and dream and get off their cell phones? Housing justice and environmental justice go hand in hand.
PROPOSED MITIGATION IS INCOMPLETE
Tree Canopy and Climate; Tree Preservation and other Environmental Elements are Not Adequately Addressed in the EIS. Required Mitigation Measures to Achieve Policies are Not Addressed or Proposed in the Comprehensive Plan or SEPA Review / EIS.

The results from this failure to properly address the required climate change and tree canopy policies and lack of inclusion in the Plan and lack of analysis in the EIS are likely to be:

1 a tremendous loss of mature tree canopy as the City falls further and further behind from its adopted policy goal for 30% tree canopy coverage by 2037;

2 adverse health impacts from loss of tree and green space (particularly for overburdened or highly impacted communities); health impacts will almost certainly include increasing mortality and hospitalizations of vulnerable populations due to projected increasing days of severe high temperature with the highest temperatures in residential areas that lack tree canopy and

whose residents have the most adverse social determinants of health (e.g., overburdened and highly impacted communities and populations under the State HEAL Act).

3 adverse impacts due to increased storm water runoff, including stream erosion, contamination entering surface waters, harm to salmon or fish habitat and recovery and biological diversity in surface waters and shoreline habitat, impacts on meeting legal requirements to reduce combined sewage overflows and lack of mitigation for increased runoff from increasing impervious surfaces from other plan policies.

194-1 cont

4 The current proposal will help connect clearcut lots with other cleared lots and spread tree deserts and build urban heat islands. With just a 5-ft setback, you are building a natural environment dead zone.

5 Extreme weather events, like summer droughts with record heat, require an infrastructure that includes shade trees. As we build more multiplexes that have few to no windows that open, and fewer with balconies, what happens if the power goes out and its 100+ degrees outside?

The solution?
Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.
Build taller, not lot line to lot line, but regardless of which housing zone, saving the best healthy trees and building around them. Give extra height bonuses to save trees with affordable housing. Is Seattle clever enough to build affordable housing with open space for families and trees and habitat for all? Is Seattle going to be a leader in Environmental Stewardship, or just clearcut our way to environmental justice?

Thank you,
Richard Ellison, MS Botany
8003 28th Ave NE, Seattle, WA 98115 climbwall@msn.com

Richard Ellison
climbwall@msn.com
8003 28th Ave NE
Seattle, Washington 98115-4639

Letter 195

From: Karin Engstrom
To: PCD_CompPlan_EIS; PCD_OneSeattleCompPlan
Cc: Saka, Rob; Woo, Tanya; Nelson, Sara; Tree Action Seattle
Subject: Comments on Seattle"s Comprehensive Plan
Date: Friday, May 3, 2024 4:09:17 PM

CAUTION: External Email

I've received emails from organizations that are reading the plan and suggesting comments, but I could not find on all the websites I looked at from the Mayor's office whether there were local meetings or zoom calls to go through the plan - even a course in navigating all the documents and how they connect with others would be helpful.

195-1

I have read National Forest Plans and the Hanford output weekly - but that takes lots of time. The plan lists many entities and agencies and they pay someone to read and make judgement on the plan's value, but the average citizen is not getting paid to go over all this materia. Part of the plan must include a way to present the many documents and how they relate. I sure hope I've missed something,

My concerns over the years are the retention of trees. The new tree policy has eliminated heritage trees and I hear about very valuable trees being cut down. Further - how does this plan affect the School District when they are making changes on school property.

195-2

There are ways to evaluate the value of a tree that is planned for removal. It's value in connection with the other trees on the lot, How much carbon is stored from those trees - etc. I looked this all up when the School District was going to remove a group of Black Locust. Now I know they are not native to Seattle - but that group provided excellent shade along its fence and housed many birds and critters. Where do they go when it is all removed. Like Gaza? Just kill them all? It will take years to equal the work that those trees did in providing oxygen and their storage of carbon,

Ever Onward!

Karin Engstrom, MA
206-390-1013

A road is itself a kind of sentence, or story. A real place, it's also a metaphor for time, for future becoming present and then past, for passage.

Rebecca Solnit, Savage Dreams, a Journey into the Landscape Wars of the American West

Letter 196

From: Joren Estrada
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 4:52:23 PM

CAUTION: External Email

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

196-1

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Joren Estrada
joren.estradaaa@gmail.com
1158 N 91st St Apt 404
Seattle, Washington 98103

Letter 197

From: stevi.exit@gmail.com
To: PCD_CompPlan_EIS; LEG_CouncilMembers
Subject: Important Comment on DEIS
Date: Monday, May 6, 2024 12:28:02 PM

CAUTION: External Email

Please note my comment on the DEIS:

1: Section P 3-3 states that “none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild.” What is the impact of the plan specifically on Seattle’s plants and animals?

2: Section P 3-3 states that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." What analysis shows that tree planting programs, coupled with increased hardscape, will compensate for lost urban forest? 197-1

3: The plan states that Seattle will make progress toward its 30% canopy goal. The new tree ordinance substantially reduces private land available for trees. How much public land is available to reach the 30% goal? How many trees will need to be planted in these areas every year to make up for trees removed by development?

Sincerely,
Stephanie

Letter 198

From: Carol Fahrenbruch
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 3:22:14 PM

CAUTION: External Email

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).
* Please listen to and follow the advice of the Seattle Urban Forestry Commission. Despite their hard work and expertise, they have consistently been sidelined by development interests. We can both protect our mature tree canopy on private lots and build needed density. Yes, it will be more expensive if only the building costs are factored into the economic analysis without considering the economic benefits provided by our existing mature trees and the climate and natural environment costs of losing them.
* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

198-1

Mitigation recommendations:

* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Carol Fahrenbruch
cfahrenbruch@gmail.com
4553 51st Ave NE
Seattle, Washington 98105

Letter 199

From: andrea Faste
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 9:35:02 AM

CAUTION: External Email

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities. I am particularly concerned about upkeep on existing mature street trees in medians such as 8th Avenue NW between NW 85th and NW 65th.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

199-1

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

andrea Faste
amfaste@comcast.net
7713 11th Av NW
Seattle, Washington 98117

Letter 200

From: Tareq Fayyad
To: PCD_CompPlan_EIS
Cc: Nelson, Sara; Morales, Tammy; Woo, Tanya
Subject: Questions on the environmental impact statement
Date: Wednesday, May 8, 2024 8:59:54 AM

CAUTION: External Email

Hi,

I'm reaching out with questions about the environmental impact statement

Section P 3-3 states that “none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild.”

200-1

Will you please elaborate on the details? How will this plan affect Seattle's plants and animals?

Section P 3-3 states that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover."

How does the conclusion show that planting + hardscape will replace the environmental contribution of the mature urban forest in the near and far future?

The plan states that Seattle will make progress toward its 30% canopy goal. The new tree ordinance substantially reduces private land available for trees.

How much public land is available to reach the 30% goal? How many trees will need to be planted in these areas every year to make up for trees removed by development?

200-1

Thank you

Tareq Fayyad (they/them)
Sustainability Coach & Educator
Trillium Sustainability LLC
www.Trillium.eco
Changing our culture of consumption and reclaiming stewardship

From: Nico Faz
To: PCD_CompPlan_EIS
Subject: DEIS Comments
Date: Monday, May 6, 2024 5:00:10 PM

CAUTION: External Email

Good afternoon,

The DEIS needs to study an alternative which the citizens demanded in the 2022 scoping: Alternative 6. We need to study the impact of 150,000 units of capacity so that we can meet the moment of current undersupply and readily plan for the arrival of 250,000 new residents by 2044. We cannot continue with the status quo of low housing stock, decreasing housing affordability, and minimal varieties of housing.

201-1

Please also provide us the criteria for selection of neighborhood centers. How was the list narrowed down between scoping and drafting and why? We need all the original neighborhood centers returned to the FLUM so that we can provide new units all across the city and open up otherwise exclusive neighborhoods to new, lower-income residents.

The DEIS should also ensure that bulking regulations such as FAR and lot coverage, as well as parking minimums, can be lifted on every residential lot in the city. HB 1110 requires the allowance of a sixplex on every residential lot in the city if it has an affordability component. This will only be achieved if the Plan incentivizes development through tiered restrictions like Commerce's recommendation or a removal altogether like Spokane's new zoning ordinance.

Best,
Nico Faz

Letter 202

From: Rob Fellows
To: PCD_CompPlan_EIS
Subject: One Seattle Plan DEIS comment
Date: Monday, May 6, 2024 3:57:23 PM

CAUTION: External Email

Hello,

The DEIS No Action alternative assumes that new zoning requirements consistent with HB 1110 (2023) are in place. I believe this is incorrect. HB 1110 directs the City to change its zoning, but does not put the new zoning in place; that is done through Seattle's change to its comprehensive plan and zoning map. This comprehensive plan update implements HB 1110 through the proposed action; therefore the impacts of implementing HB 1110 should be documented as an action rather than included in the No Action alternative.

202-1

Rob Fellows
115 N 84th St.
Seattle, WA 98103

Letter 203

From: Jeff Fernandes
To: PCD_CompPlan_EIS
Cc: Moore, Cathy
Subject: Questions that need answers regarding Environmental Impact
Date: Friday, May 3, 2024 9:47:21 AM

CAUTION: External Email

1. **What is the impact of the plan on non-human life? This includes all the relationships of animals and plants and our shared environment. We must stop destroying our natural world and facilitating mass extinctions of non-human life.**

2. Studies have shown that tree planting programs are inferior replacements for existing forests. How will you ensure that existing forests are not destroyed by the comp plan?

203-1

3. Have you provided a map of public land where you plan to reforest? How much land have you set aside for this? How do you plan to keep alive these newly planted trees given the intensifying heat and drought of our summers? It is extremely difficult and expensive to keep newly planted trees, so what is your detailed plan and budget for ensuring you are not just planting trees that will die in a heat wave?

Letter 204

From: Kaeli Fertal
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 7:45:42 AM

CAUTION: External Email

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

204-1

Mitigation recommendations:

* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Kaeli Fertal
kaelifertal@gmail.com
8543 Midvale Ave N Apt 503
Seattle, Washington 98103

Letter 205

From: Julia Field
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 10:02:22 AM

CAUTION: External Email

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

205-1

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Julia Field
1juliafield@gmail.com
2034-A NW 60th St
Seattle, Washington 98107

Letter 206

From: Michael Filipovic
To: PCD_CompPlan_EIS
Cc: Rivera, Maritza; Woo, Tanya; Nelson, Sara
Subject: Seattle's Comprehensive Plan Concerns
Date: Friday, May 3, 2024 9:17:41 AM

CAUTION: External Email

Here are my concerns and questions.

Can you explain what impact each of these plans has on Seattle's trees, plants and non domesticated animals.

Section P 3-3 reads none of the alternatives "would be expected to have significant, unavoidable adverse impacts on tree canopy cover". This phrase raises red flags when it combines the word "significant" with "unavoidable". It leaves an awful lot of wiggle room for mass destruction of tree cover, particularly if that phrase becomes the legal standard by which any of these plans is judged. It seems designed to offer to developers who wish to take the easiest path to development in the city.

206-1

One goal of the Plan is to increase tree canopy in Seattle by 30% primarily by using city owned property rather than public land, but where are the specifics? For each plan, How many trees must be planted in those areas to replace those that are lost in the private sector, how much of that tree canopy will be added to the parts of Seattle — particularly on the South End —-where there are fewer trees at present.

Thank you for considering this email.

Michael Filipovic

Sent from my iPad

Letter 207

From: mark a. foltz
To: PCD_CompPlan_EIS
Subject: Comments on Seattle Comprehensive Plan DEIS
Date: Sunday, May 5, 2024 9:51:02 PM

CAUTION: External Email

Thank you for this opportunity to provide comment on the Draft Environmental Impact Statement for the Periodic Update to the Comprehensive Plan.

The proposed alternative for the Seattle Comprehensive Plan does not address Seattle's future housing needs. It only adds capacity for 120,000 new homes over the next 20 years, which is far less annually than Seattle has produced under the previous comprehensive plan. Bellevue, a city that is one-sixth the size of Seattle, is planning on adding 40,000 new housing units over the next 20 years. Seattle must step up and do its part and produce a comprehensive plan which results in 200,000 new homes. This would match the current rate of housing production.

Moreover the current alternative falls well short of the need for affordable housing. Seattle's own Housing Needs Assessment requires that Seattle build over 70,000 new homes that are affordable to families making 80% or less of AMI. The current alternative would build only 18,000 such homes - meaning that over 50,000 families will either become overburdened with housing costs, or be displaced out of Seattle. 207-1

The definition of a "neighborhood center" to within 800 feet of a frequent transit stop is hardly believable. That is barely half a block. How can you provide the basic necessities for a family, including groceries, a drugstore, child care, and other services all within half a block? Let alone opportunities for dining, entertainment or the arts? The neighborhood center designation must include enough room to allow essential services for families to become available near transit stops.

Finally the changes to residential zoning will cause single family homes to be predominantly replaced by townhomes. Townhomes are fine, but we need a variety of housing types in single-family neighborhoods to start to undo decades of racial and class segregation in Seattle through exclusionary zoning.

I request the following in the final EIS:

- Analysis of an alternative that provides 200,000 new homes over the next 20 years in Seattle.
- Analysis of an alternative that provides 70,000 new homes affordable to 80% AMI.
- Analysis of an alternative that expands the neighborhood center designation to within at least 0.25 miles of a frequent transit stop.
- Analysis of an alternative that permits small apartments and quadplexes in all formerly single family only neighborhoods.

Thank you for considering my comments.

Please make me a party of record for the Seattle Comprehensive Plan DEIS and FEIS.

Mark Foltz

5813 17th Ave NE, Seattle, WA 98105

DEIS StoryMap Comment

Name: Corey Ford

Email: corey@coreyford.name

Date: 5/2/2024

Comment:

The city should study the impacts of additional Neighborhood Centers in Urban Neighborhoods, as well as greater height and density bonuses within a half mile of transit stops. Of the available alternatives, I strongly prefer Alternative 5 with higher growth targets. 208-1

Letter 209

From: Adrie Anna Franco
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 9:44:55 AM

CAUTION: External Email

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

209-1

Mitigation recommendations:

* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Adrie Anna Franco
adrie.franco@yahoo.com
4411 Montclair Dr SE
Lacey, Washington 98503

Letter 210

From: Jill Freidberg
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 8:05:32 AM

CAUTION: External Email

Comments Planning and Community Development EIS,

The science is clear. Creating policies that are based on short-term outcomes is counter-productive and destructive. We cannot plan for an equitable, live-able city that has fewer trees. Tree canopy is our best tool for keeping our city cooler. Every tree that is lost creates another heat island in its place.

The numbers are also clear when it comes to equity. Historically Black and brown neighborhoods in Seattle have more real estate development and less tree canopy. Let me put that another way. The distribution of tree canopy in this city is blatantly racist, and the city is complicit because 1) it looks the other way as real estate developers repeatedly cut down legacy trees and then just pay the fine and 2) city planning repeatedly places the burden of growth on neighborhoods south of the ship canal, leaving neighborhoods like Ravenna, Magnolia, and Laurelhurst with their single family homes tucked beneath well-established tree canopy, while neighborhoods like Rainier Beach and Beacon Hill bake under the sun in expanding concrete canyons of ever higher apartment buildings. If the city can't find a way to plan for the future in a way that repairs the economically, environmentally, and culturally inequitable systems of the past (and present), then there will never be "one Seattle." 210-1

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

* Create and enforce legislation and policies that actually deter the illegal removal of trees by real estate developers. Current and proposed policy will do nothing to deter these practices.

Thank you for your consideration.
Jill Freidberg
Central District

Jill Freidberg
jill.freidberg@gmail.com
151 22nd Ave
Seattle, Washington 98122

210-1 cont

Letter 211

From: Josh Friedmann
To: PCD_CompPlan_EIS; PCD_OneSeattleCompPlan
Subject: Public comment on DEIS and Draft Comp Plan
Date: Monday, May 6, 2024 4:23:07 PM

CAUTION: External Email

Dear DPCD team,

Thank you for your many hours of work on the One Seattle planning process and related environmental documents. I am a very proud Seattlite - this is the city where my grandparents finally found freedom, acceptance and happiness after arriving as refugees from genocide overseas. Today I feel very lucky to own a home off the intersection of 57th Avenue S and S Orcas Street.

I hope to live in my home for many years to come, to raise a family there, to age in place, and if I can afford it, to provide an ADU or DADU as a rental option to someone seeking an affordable home. I ask that the Mayor's Final Proposed Plan (and the accompanying FEIS) do the following to make my neighborhood more sustainable, walkable, vibrant and affordable:

211-1

- In the final Plan, please include the Seward Park Neighborhood Center as studied DEIS Alternative 5. If you can, please include all studied Neighborhood Centers in the Final Plan. In the FEIS, please ensure to study the likely adverse environmental consequences of failing to do so.

- Please implement the Corridor designation studied in DEIS Alternative 4 in the streets surrounding the gateway to Seward Park. If you can, please reinstate the Corridor designation City-wide. In the FEIS, please ensure to study the likely adverse environmental consequences of failing to do so.

- Please raise FAR and eliminate minimum-parking mandates in the Seward Park neighborhood and City-wide, for the benefit of our air, our health, and our housing affordability. In the FEIS, please ensure to study the likely adverse environmental consequences of failing to do so.

- If the Corridor model is *not* reinstated in the Final Plan, please clarify that Urban Neighborhoods may accommodate zoning designations other than NR. It concerns me that many current Multifamily-designated areas on today's Future Land Use Map are currently proposed to replaced by Urban Neighborhood, which appears intended to be predominantly a single-family and middle-housing designation. If the Urban Neighborhood designation is intended to possibly include LR and MR zones (the way the Multifamily designation does today) please clarify that to ease future rezoning efforts, whether proposed by Council or by private parties. Please ensure that similar clarifications are made throughout the FEIS.

- Please ensure that in the FEIS, environmental impacts (especially in the realm of housing supply and affordability) are studied with reference to *likely* job and population growth in the City, not merely *targeted* growth. Planning only for a targeted outcome is very risky, so I hope we instead will use the best available information to plan for a range of *most likely* outcomes. We should be preparing our City to be welcoming to both its current residents and many more people who will arrive whether they are part of the County's targeted population growth or not.

- I also endorse and support the requests stated in the Complete Communities Coalition letter.

These comments are respectfully submitted in my personal capacity as a Seattle resident and voter; they are not submitted on behalf of any organization or any client.

211-1 cont

Thanks for your time and all of your hard work. Onward!

Josh Friedmann
(206) 412-6316

Letter 212

From: Barbara Fristoe
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 5:55:16 AM

CAUTION: External Email

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

212-1

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Barbara Fristoe
bfristoe@mac.com
3418 16th Ave S
Seattle , Washington 98144

From: Michelle Gadeken
To: PCD_CompPlan_EIS
Subject: Seattle One Comprehensive Plan feedback
Date: Tuesday, April 2, 2024 11:30:04 AM

CAUTION: External Email

The draft plan does not make enough measurable change. The city should enact Alternative 6 and or improve the plan follows:

1. Allow bigger buildings in more places - to break out of the “Urban Village” strategy and scarcity mindset. Expanding existing "Urban Centers" as well as add more and up zone them higher. Residential Small Lot (RSL) zones to Lowrise 1 (LR1) is not enough.
2. Add more “Neighborhood Centers” to anchor small neighborhood business districts with housing.
3. Zone for fourplexes and sixplexes that will actually get built and support families with three- and four-bedroom homes. The proposed restrictive size limits — particularly the floor area ratio (FAR) set at a measly 0.9 — are effectively erasing the value of the fourplex and sixplex zoning. Follow state model code and allow 1.6 FAR in sixplex areas instead.
4. Embrace transit-oriented development and allow larger apartment and condo buildings near all frequent transit corridors. The mayor’s proposal appears to have jettisoned the transit corridor alternative from scoping.
5. Remove parking requirements. Parking requirements are a secret tax on housing that render many projects infeasible. We cannot afford this amidst a housing crisis.
6. Corner stores should not only be on corners. Allow more flexibility to ensure more neighborhoods can actually get bodegas or cafes.

213-1

Further explanation of each point can be found at https://www.theurbanist.org/2024/03/29/op-ed-six-ways-to-improve-seattles-comprehensive-plan/

Thanks,
M

Letter 214

From: Chris Gaul
To: PCD_CompPlan_EIS; LEG_CouncilMembers
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 12:08:45 PM

CAUTION: External Email

May 6, 2024

Good Morning,

I support Alternative 2 to concentrate growth as it results in less canopy loss for Seattle. Under Alternative 2, about 3,000 acres of currently lower-density parcels may be converted to higher-density uses (neighborhood centers), the smallest area of conversion among the action alternatives (Exhibit 3.3-4). Growth would be focused in neighborhood centers. Among the action alternatives, Alternative 2 would thus have the lowest potential for development-related impacts to vegetation (including loss of tree canopy cover) citywide. 214-1

In addition, I have these questions:

- P 3-3-29-30 Please analyze the potential impact of the 5 options on Seattle plants and animals. This is a Seattle EIS, not a regional or state EIS. Saying "unlikely to result in appreciable impacts on regional populations of plants or animals"' and "none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild" is avoiding commenting on the specific impacts on Seattle plants and animals.

- p 3-3-30 Saying that "none of the action alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." is not backed up by facts but speculative at best. The new tree protection ordinance actually increases the potential for tree removal in several ways. One is that all the developmental areas covered by the ordinance state that the newly defined "basic tree protection area cannot be modified" despite Portland, Oregon and the Northwest Society of Arboriculture saying it can be modified to save trees. This and current lot coverage of 85 - 100% for multifamily lots and above and rezoning to occur means more trees, especially large ones, will be removed. What is your estimation of potential canopy acreage loss (over 5 year periods consistent with the city's canopy studies) with increased development density in each alternative?
- What is your estimation of planting needs and time frame to replace the lost canopy (over 5 year periods tracked by the city's canopy study)?
- Is canopy replacement equivalence even possible with replanting since removed trees, if not removed, would have increased growing according to scientific articles?

What is the acreage available and suitable for planting trees in each of the following public areas- the city's right of ways, Natural Areas and Developed Parks?

- How many trees and what size will need to be planted in these areas every year to make up for trees and canopy removed during development on lots?
- What is the available acreage available to plant trees on private property?
  When will it be possible to reach the 30% citywide goal?

- What potential is there for more than 30% tree canopy in Seattle over time?
- Is up to 40% canopy coverage, over time, as proposed in the previous Comprehensive Plan possible?

- Canopy volume, especially of coniferous trees during our rainy season, are critical factors in reducing stormwater runoff. What is the projected loss in canopy volume over the next 20 years as big trees, including conifer trees are removed?
- What is the projected increase in stormwater runoff and what costs are associated with on site and alternative city water management policies of stormwater and pollutant runoff as a result?

214-1 cont

Finally, please consider the following:

- Amend the Tree Protection Ordinance to require developers to maximize the retention of existing trees 6" DSH and larger.
- Give SCCI Director the ability to ask for alternative site designs to save trees.
- Support building higher and building attached units to allow for tree retention and planting areas like Portland, Oregon has with 20% areas for multifamily and 40% for its 1-4 unit family zone.
- Amend Tree Protection Ordinance to require ordinance to apply to all city land use zones.
- Remove the "basic tree protection area" loophole in the Tree Protection Ordinance that allows developers to unnecessarily remove almost all large trees on lots.

Regards,
Chris Gaul
District 5

Letter 215

From: Mark Ghiorso
To: PCD_CompPlan_EIS
Cc: Rivera, Maritza
Subject: Questions reenvironmental impact statement
Date: Monday, May 6, 2024 4:56:43 PM

CAUTION: External Email

I have three questions to ask regarding the environmental impact statement that I do not see addressed in the document:

It is not clear what specific impact the plan will have on Seattle's plants and animals. Will migration zones be affected? Will bird habitats be destroyed? What is the documentation to substantiate the claim of limited impact.

215-1

How will the existing tree canopy cover be adversely affected or fully compensated by the proposed tree planting programs, coupled with increased hardscape? What are we giving up in the fight to mitigate climate change in this context?

The new tree ordinance substantially reduces private land available for trees. How much public land is available to reach the 30% goal of increasing our tree canopy? How many trees will need to be planted in these areas every year to make up for trees removed by development?

I believe that these issues must be addressed in the revision of this EIS.

Sincerely,

Mark Ghiorso
7336 24th Ave NE
206 550-1850

DEIS StoryMap Comment

Name: Michael Gillenwater

Email: mwgillenwater@gmail.com

Date: 4/6/2024

Comment:

I am a homeowner in North Beach, and I believe that the City of Seattle did not listen to the overwhelming majority's call for an Alternative 6 vision, which would lower the cost of housing across the city. Instead the current draft plan will increase already unaffordable housing costs. To create a more affordable city, the plan should allow much more housing to be built away from noisy, polluted arterials.

216-1

In Ballard in particular, I think that the plan should expand the upzone walk shed around high frequency transit to at least 1/2 mile.

If the City of Seattle adopted my above proposed changes, then we would be able to create a more affordable city for everyone.

DEIS StoryMap Comment

Name: Michael Gillenwater

Email: mwgillenwater@gmail.com

Date: 4/6/2024

Comment:

I am a climate scientist living in Ballard, and I believe that the City of Seattle did not listen to the overwhelming majority's call for an Alternative 6 vision, which would allow for more sustainable, car-free or car-light living. Instead the current draft plan will worsen congestion and pollution by forcing more people into long commutes. To create a more sustainable, vibrant city, the plan should eliminate parking minimums. 217-1

In North Seattle in particular, I think that the plan should apply Vision Zero best practices on dangerous roadways like Aurora Ave.

If the City of Seattle adopted my above proposed changes, then we would be able to reduce greenhouse gas emissions.

DEIS StoryMap Comment

Name: Michael Gillenwater

Email: mwgillenwater@gmail.com

Date: 4/6/2024

Comment:

I am a homeowner in North Beach, and I believe that the City of Seattle did not listen to the overwhelming majority's call for an Alternative 6 vision, which would enable the creation of more walkable neighborhoods. Instead the current draft plan will lock us into dangerous, polluting car dependency. To create a more equitable, sustainable city, the plan should allow for corner stores in many more places. 218-1

In Ballard in particular, I think that the plan should look at zoning and othe changes to the Shilshole marina area to allow a more vibrant and walkable mixed use area given its access to the gem of the Seattle park system, Golden Gardens.

If the City of Seattle adopted my above proposed changes, then we would be able to reduce greenhouse gas emissions.

DEIS StoryMap Comment

Name: Michael Gillenwater

Organization: Greenhouse Gas Management Institute

Email: mwgillenwater@gmail.com

Date: 4/6/2024

Comment:

I have been a IPCC lead author for the last 20 years, a former lead author of the U.S. national greenhouse gas inventory submitted to the UNFCCC by the U.S. EPA, an academic scholar focusing on GHG accounting and mitigation analysis, and co-Editor for the journal Carbon Management.

Regarding the summarized impact of the five alternatives with respect to greenhouse gas emissions that is presented in Exhibit 1.6-3. GHG Emissions (MTCO2e) by Alternative and Per Capita Rate. Although I applaud the presentation of per capita emissions, I challenge the analysis as presented. First, the use of an emission inventory methodology to compare alternative scenarios is flawed, especially when inappropriate boundary conditions are used. Focusing on city boundaries when the impacts of shifting from a baseline scenario to an alternative scenario have impacts regionally will lead to erroneous policy decisions. Obviously, exclusionary zoning that drives a lack of affordable housing will simply shift populations and increase transport (e.g., commuting) outside of the analysis boundary (i.e., Seattle to surrounding areas). A consequential (intervention) analysis approach is the appropriate methodology for informing policy choices, versus an inventory (allocational or called attributional in LCA) method that compares only city-wide inventory estimates. For a deeper technical discussion of why this approach is flawed, see here:
https://ghginstitute.org/2023/12/19/what-is-greenhouse-gas-accounting-turning-away-from-lca/

219-1

Therefore, the comparative analysis of GHG emissions between each scenario in the EIS is fundamentally flawed. For example, assuming that all electricity in Seattle is carbon neutral, and therefore any changes in electricity consumption has no effect, problematically ignores the fact that wholesale power markets are connected and that less consumption in Seattle (due to less housing being built) will not impact how much electricity is consumed in the surrounding area (due to shifting population). Similarly, focusing on construction related emissions within Seattle only, while ignoring changes in construction outside of Seattle resulting from the implementation of an alternative scenario is also misleading. Simply put, from a consequential impact analysis standpoint, in what world are the comparative system wide (i.e., regional in this context) impacts greater in a scenario with a more dense walkable urban environment than a scenario that drives populations into less dense walkable and car-dependent areas.

I recognize that redoing the EIS on this matter at this stage is likely impractical, and I am not demanding that be done. Although, ideally, a proper scenario analysis that compared system wide (regional and global) GHG impacts of each alternative relative to the base case would be done. However, the summary discussion on GHG emission impacts, by focusing not just narrowly but misleadingly only on citywide emissions, provides policy makers and the public with incorrect information upon which to judge the tradeoffs between alternatives for a global environmental challenge such as the mitigation of GHG emissions. Therefore, the EIS should, at a minimum, qualitatively acknowledge the flaws in this presentation applying a proper impact analysis methodology that Alternative 5 would be highly likely to

result in greater overall avoided GHG emissions relative to the the base case and the other policy alternatives. I would be happy to follow up with the EIS team on how to address this apparent methodological error. I would also be happy to comment the draft Appendix D on GHG emissions if it is provided for review (it is empty when viewed online).

Sincerely,
Michael Gillenwater, PhD

219-1
cont

Letter 220

From: Julie Gingerich
To: PCD_CompPlan_EIS
Cc: Morales, Tammy
Subject: environmental impact of the comprehensive plan
Date: Monday, May 6, 2024 3:39:46 PM

CAUTION: External Email

a review of the comprehensive plan raises important questions about its potential effect on our natural environment.

220-1

- what are the specific ways that the comprehensive plan for development would impact plants and animals. How would the immediate impact be measured and what in the plan would ensure that steps would be taken to mitigate any harm done?

- What analysis has been done that shows that tree planting programs will compensate for lost urban forest?

- How much public land will be made available for replanting trees to make up for the trees canopy that will be lost due to the new tree ordinance . how many new trees would need to be planted in these public areas every year to make up for the mature trees that are removed by development.

thank you
julie gingerich
5314 18th avenue south 98108

From: David Gloger
To: PCD_OneSeattleCompPlan; PCD_CompPlan_EIS; LEG_CouncilMembers
Subject: Comments on our One Seattle Comprehensive Plan and EIS
Date: Sunday, May 5, 2024 9:30:13 PM

CAUTION: External Email

Please accept my comments on the One Seattle Comprehensive Plan and the associated EIS.

I would like to see **Alternative 2** further examined and modified.

Please maintain the existing tree canopy goals of 30% by 2035 and 40% over time and specify with data how this will be achieved. 221-1

Also, please analyze the potential impact of the final selected option on **Seattle's plants and animals**.

And I have a few questions for you:

- What is your estimation of tree planting needs and a time frame to replace the equivalent lost canopy area and volume (over 5-year periods as tracked by the city's canopy studies)?

- Is canopy area and volume replacement equivalence even possible with replanting since removed trees, if not removed, would have increased growing according to scientific articles?

  What is the acreage available and suitable for planting trees in each of the following public areas: the city's right of ways, natural areas, and developed parks?

- How many trees and what size will need to be planted in these areas every year to make up for trees and canopy removed during development on lots? How many trees and what size for all canopy loss?

- What is the available acreage available to plant trees on private property?

- When will it be possible to reach the 30% citywide goal?

- What potential is there for more than 30% tree canopy in Seattle over time?

- Is up to 40% canopy coverage, over time, as proposed in the previous Comprehensive Plan even possible?

- Canopy volume, especially of coniferous trees during our rainy season, are critical factors in reducing stormwater runoff. What is the projected loss in canopy volume over the next 20 years as big conifer trees are removed?

- What is the projected increase in stormwater runoff and what costs are associated with on site and alternative city water management policies of stormwater and pollutant runoff as a result?

221-1 cont

I am seriously concerned about the significant loss of trees in Seattle as more and more residential lots undergo development. It seems that no mature trees are safe any longer in Seattle. I would like to see the following changes made to mitigate any further increase in the loss of our life-sustaining urban forest:

- Amend the Tree Protection Ordinance to require developers to maximize the retention of existing trees 6" DSH and larger.
- Give SCCI Director the ability to ask for alternative site designs to save trees.
- Support building higher and building attached units to allow for tree retention and planting areas like Portland, Oregon has with 20% areas for multifamily and 40% for its 1-4 unit family zone.
- Amend Tree Protection Ordinance to require ordinance to apply to all city land use zones.
- Remove the "basic tree protection area" loophole in the Tree Protection Ordinance that allows developers to unnecessarily remove almost all large trees on lots.
- Require developers to submit a tree inventory on lots they intend to develop.

Thank you for your work, and I hope that you will take great measures to ensure that, as we grow our city, we take into consideration all that makes life here so beautiful, sustaining and life-giving: our trees and plants, birds and animals, our creeks and hillsides. The city is not adequately protecting what makes Seattle most livable and beautiful, and we must do better!

David Gloger
Seattle, WA

From: J G
To: PCD_CompPlan_EIS; Strauss, Dan
Subject: D6 comments
Date: Sunday, May 5, 2024 10:59:21 AM

CAUTION: External Email

Hi all,

Thank you for your work. In one of the DEIS meetings, I asked what impacts had been studied on the starving and polluted Southern Resident Killer Whales. The answer from Brennan was that the impact on the SRKWs from additional stormwater produced by a reduction in mature trees while adding humans creating more sewage had not been studied. P 3-3 says no impact but more study seems to be needed if our most vulnerable endangered wildlife was excluded. I also asked if the impact of removing shade providing mature trees had been studied given it will increase the need and reliance on a/c with predictions of higher temps. Growing numbers of people with and without health challenges will succumb to adverse health outcomes without cooler air in the hotter temps. The energy industry has predicted shortages in electricity with rising temperatures. 222-1

I'd assume any true EIS would include actual environmental impacts to our most vulnerable/endangered fauna and life/shade giving flora. I'm confident we can do this safely and equitably with climate justice for all residents of the "Emerald City." Where has the 2035 canopy goal gone? How will we reach 30% and on what land? Those who want to alter our city externally from other cities should not outweigh those who reside in Seattle. Especially when the majority of these vote for stronger tree ordinances in their homes in alternate cities. That would be very inequitable, wouldn't it?

Thank you so much for your work,
Jennifer Godfrey

Letter 223

From: Jennifer Godfrey
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 7:31:22 AM

CAUTION: External Email

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

223-1

Mitigation recommendations:

* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Jennifer Godfrey
plantkingdom1@gmail.com
1900 W NICKERSON ST, STE 116 PMB 206
Seattle, Washington 98119

Letter 224

From: Demian Godon
To: PCD_CompPlan_EIS
Subject: Comp Plan draft
Date: Monday, May 20, 2024 7:00:02 PM

CAUTION: External Email

Hi,

While the draft comp plan had some good elements, it needs to go much further in allowing more housing options in more of the city. The plan is a generational opportunity and the city faces numerous crises related to lack of housing options that will stagnate or get worse with the modest current draft. We need Seattle's comp plan to align with state law and allow 6-plexes throughout the city and missing middle housing in many more areas, not just on congested, polluted, and dangerous thoroughfares. 224-1

As a homeowner in Magnolia, I'm relatively lucky to live on a quiet street near good schools and many amenities. But my neighborhood has effectively locked out working class and poor people through restrictive zoning. This has also limited options for retirees looking to downsize or young adults getting a start in life as there are scarcely any affordable options like 4 or 6 plexus, apartments, or condos. The lack of density in Magnolia and many other similar exclusive neighborhoods across the city also restricts transit options and frequency making it harder for the city to meet its climate goals.

Let's go big and make Seattle a great and thriving city for all!

Thanks,

-Demian

ATTN:
Office of Planning and Community Development
c/o Jim Holmes
City of Seattle

Hello,

As both a citizen and business owner in the City of Seattle I am providing my comments on the City's Draft Environmental Impact Statement (DEIS, 2024) as part of the public comment period. I have both numbered them and also provided pages references as necessary. These comments represent my personal opinions and do not reflect those of any organizations or entities I may be affiliated with. 225-1

My comments are as follows:

General Comments

1. Please study the elimination of all parking requirements in the Final EIS, as a recognition that parking will still be allowed and that the market will decide how much parking should be constructed

2. Please Provide an Alternative in the Final EIS that can address 50% the current need for income-restricted housing (housing available to those at 80% AMI or below) in a pattern consistent with Alternative 5. Based on the recent MHA/IZ program, the City's current programs result in 7% of all produced housing being in this category of income-restricted housing and the total number of units needed according to the 2020 Community I 225-2

3. For all Alternatives, please study providing high-rise zoning immediately adjacent to all light-rail stations (within 1000 feet or 1/8th mile) similar to what is done at SkyTrain stations in Vancouver.

4. In the Final EIS, please study condensing the Seattle Mixed, Commercial, and Multifamily Zones into one Category

5. For all Alternatives, please revise the Capitol Hill Regional Center to include all land as designated "Broadway" under the City Clerk's Geographic Indexing Atlas 225-3

6. For All Alternatives, please revise the Madison-Miller Urban Center to include all land designated as "Stevens" under the City Clerk's Geographic Indexing Atlas

7. For All Alternatives, please extend the SLU Regional Center to include all land designated as "Westlake" under the City Clerk's Geographic Indexing Atlas

8. For all Alternatives, please study the impact of exempting all deep green building projects from the Design Review process.

9. For All Alternatives, please extend the adjacent Urban and Regional Centers to include all land designated as “Minor” into an adjacent Urban Center OR provide justification for not including these areas given their location between Urban Centers and Regional Centers.

10. For all Alternatives, please revise the Montlake Neighborhood Center to include all land between the proposed area and the light rail station located to the north.

11. For all Alternatives, please revise the 145th station area to include the same distance from the station in the station area as is include in the 130th station, particularly as this road is slated to receive a bus-rapid transit line.

12. For all Alternatives, expand ‘corridor’ areas to include all parcels located within a 10-minute walkshed of transit stops used

13. For all Alternatives, please expand the adjacent Urban Centers to cover all areas of North Beacon Hill up to Dearborn Street (fill the gap.)

14. For all Alternatives, please provide an Urban Center adjacent to Discovery Park

15. For All Alternatives, please fill the gap between the Fremont and Wallingford Urban Centers

16. For all Alternatives, please expand the Wallingford Urban Center to include no less than ½ mile walkshed on both sides of 45th Street

17. For all Alternatives, please provide an Urban Center adjacent to Magnuson Park

18. For all Alternatives, please expand and connect the areas between the West Seattle Junction and Morgan Junction Urban Centers.

19. For all Alternatives, either establish a new Urban Center between the University Community and Roosevelt or extend the University Regional Center to include all parcels to the north of it up to the Southern Edges of the Roosevelt Urban Center and Cowen / Ravenna Parks

20. For all alternatives, please study providing a new Urban Center in NE Seattle along 35th Ave either at NE 65th or NE 75th Ave.

21. For all Alternatives, revise the center at the West Magnolia Playfield to be an Urban Center with an Area that covers a mile in diameter (no less than ½ mile in each direction around the West Magnolia Playfield)

22. For all Alternatives, revise the Green Lake Urban Center to include all lots adjacent to Green Lake Park and along all Green Lake Drives.

225-3 cont

23. For all Alternatives, please connect the areas between the North Beacon Hill and North Rainier Urban Centers. Please also fill in the hole in the Columbia City Urban Center

24. For all Alternatives, please study providing Urban Center level zoning around Jefferson Park

25. For all Alternatives, please study an Urban Center adjacent to Seward Park

225-3 cont

26. For all Alternatives, please study an Urban Center centered around the Burke-Gilman Playground Park / Seattle Children's Hospital

27. For all Alternatives, please study changing Othello into a Regional Center and expanding its reach to include parcels to the north up to the Columbia City Urban Center

28. Please Provide an Alternative that provides a Neighborhood Center (or more dense zoning designation) within a 10-minute walkshed of every parcel zoned for residential uses, thereby achieving the City's own stated goals of providing 15-Minute neighborhoods.

29. Please expand neighborhood centers to include an area no smaller than ¼-mile

30. Please study the following areas for inclusion as neighborhood centers
    a. At least one neighborhood Center in the Portage Bay neighborhood, either at Eastlake Ave E / Fuhrman Ave E or Fuhrman Ave E / E Shelby St.
    b. Greenwood Ave N / N 145th St
    c. Greenwood Ave N / N 125th St
    d. 15th Ave NW / NW 100th St
    e. 32nd Ave NW / NW 85th St
    f. 3rd Ave NW / N 80th St
    g. 8th Ave NW / NW 70th St
    h. Phinney Ave N / N 60th St
    i. Fremont Ave N / N 43rd St
    j. NW Market St between 8th Ave NW and 3rd Ave NW
    k. 24th Ave NW / NW 80th
    l. 32nd Ave NW / NW 65th
    m. Phinney Ave N / N 46th St
    n. 32nd Ave W / W Government Way
    o. 6th Ave W / W McGraw St
    p. 10th Ave W / W Howe St
    q. Queen Anne Ave N / Nickerson St
    r. Wallingford Ave N / N 37th St
    s. Wallingford Ave N / N 40th St
    t. Wallingford Ave N / N 34th St
    u. 1st Ave NE / NE 50th St
    v. Lakeside Ave / Lake Washington Blvd
    w. MLK Jr Way / E Union St

x. 34th Ave W / W Emerson St
y. 35th Ave NE at all intersections not included in an Urban Center (55th, 65th, 75th, 85th, and 95th)
z. Sand Point Way between NE 95th St and NE 97th
aa. 5th Ave NE / NE 83rd St
bb. West Seattle Water Taxi Station
cc. Alki Ave SW between 63rd Ave SW and 61st Ave SW
dd. California Ave SW / SW Charlestown St
ee. Beach Dr SW / SW Anderson St
ff. 35th Ave SW / SW Kenyon St
gg. 35th Ave SW / SW Roxbury St
hh. 9th Ave SW / SW Henderson St
ii. Highland Park Way S / SW Kenyon St
jj. 35th Ave SW / SW 106st
kk. 31st Ave S / S Atlantic St
ll. S Mt Baker Blvd / S McClellan St
mm. Beacon Ave S / S Columbian Way
nn. Beacon Ave S / S Graham St
oo. Beacon Ave S / S Myrtle St
pp. 50th Ave S / S Genesee St
qq. 15th Ave S / S Columbian Way
rr. 15th Ave S / S Lucile St
ss. Wilson Ave S / S Dawson St
tt. Rainier Ave S / S Orcas St
uu. Rainier Ave S / S Graham St
vv. Rainier Ave S / Lakeridge Park
ww. Renton Ave S / S Roxbury St
xx. Renton Ave S / 72nd Ave S
yy. E Marginal Way S / Corson Ave S

225-3 cont

Introduction / Chapter 1

31. III: how do Neighborhood Centers differ from the Neighborhood Anchors introduced as part of the Urban Village strategy in 1994?

32. IV: why is Alternative 5 only 40,000 units more than Alternative 1, given that it's a combination of Alternatives 2, 3, and 4?

33. 1-3: Please provide information justifying a continuation of the current jobs and housing imbalance based on the projected number of all Alternatives, which seems to be counter to the City's stated goals of revitalizing downtown.

34. 1-11: How does Alternative 3 achieve the goal of more housing options near large parks without designating higher density place types around Discovery Park, Seward Park, Woodland Park, Green Lake, the Arboretum, and Magnuson Park?

35. 1-7: Given current downtown vacancy rates, why is the general accepted number of new jobs being located outside of downtown 15% and not higher?

36. 1-10: it is unclear if the intend is to provide a range of zones that reflect the different housing types allowed or one zone type that allows a spectrum of housing options

37. 1-10: *"neighborhood centers could have a range of housing from townhouses to 7 story stacked housing"* – where does seven story stacked housing come from and why will these be allowed in neighborhood centers but not in neighborhood residential?

38. 1-15: re Exhibit 1.4-7 – please study an Alternative that results in a higher percentage change in Area 3 as compared to Area 5 and Area 8.

39. 1-15: re Exhibit 1.4-8 – in line with community requests for a Regional Center in the South End, please study an alternative that reduces job growth in Area 4 below 50% and increases Area 8 above 10%

40. 1-17: bottom list, bullet point 3 – please revise to study single flats up to six stories, in line with Seattle's current building code

41. 1-17: bottom list, bullet point 5 – why are bicycle requirements being studied for modification and not car parking requirements? This does not make sense given the City's goals for mode shift as well as goals for reducing VMT.

42. 1-18: bullet point 2 – the impact of MHA must be studied in the Final EIS to both comply with the GMA as well as accurately calculate the number of projected units for each alternative studied.

43. 1-18: bullet point 4 – please revise studies to emphasize reduction in VMT as required in the Climate Change and Resiliency Element given it's adoption by the City of Seattle for this Comprehensive Plan cycle

44. 1-24: please study and provide suggestions for increasing housing density while reducing pollution and runoff increases, such as allowing for higher height limits and requiring a reduction in lot coverage for multifamily-zoned land

45. 1-24: please provide evidence of compliance with HB… and lost capacity given the current contaminated sites in Seattle

225-3 cont

46. 1-27: please acknowledged the impact of increased density in the South Park neighborhood given recent examples of flooding in the area

47. 1-29: please provide an alternative or revise alternatives so that all options reduce per capita GHG emissions so that all plans can achieve AT MINIMUM the 58% reduction from 2008 levels by outlined in the City's Climate Action Plan no later than the completion of this comprehensive plan cycle (2045).

48. 1-35: please add language that acknowledges the percentage of land owned by the City that is Right-of-Way / impervious surface and the associated amount of runoff with this area

49. 1-38: please add a bullet that acknowledges the City will take additional steps to add and replace removed trees on City-owned land and Parks

50. 1-42: please provide an alternative studied that reduces VMT to below 13.0, as recorded and studied for Exhibit 1.6-6

225-3 cont

51. 1-51: why are transitions considered an environmental impact?

52. 1-54: provide information as to how Exhibit 1.6-11 ratings for tree canopy are assessed given that per the City's own recent study, almost all tree canopy loss was not due to development and nearly half was on City-owned land.

53. 1-59: third line - was there an Alternative 6 studied?

54. 1-61: it is clear Alternative 1 does not comply with HB 1220, which is related to the siting of affordable and permanent supportive housing. In the final EIS, please identify which alternatives comply with HB 1220 as the final adopted plan MUST comply with the state requirements.

55. 1-62: last paragraph, please study compliance to state and regional plans for ALL Alternatives included in the Final EIS so that the version of the plan Council votes on is clearly in compliance.

56. 1-66: please provide the impact on housing production for each Alternative studied should MHA be expanded to include all Neighborhood Residential zones.

57. 1-67: please provide information related to 'naturally occurring affordable housing' and how supply provided in each Alternative will balance those losses.

58. 1-68: what is the net increase in units affordable to those making below 100% AMI?

59. 1-70: Please note how all alternatives either meet demand or fall short as noted in Alternative 1

60. 1-89: For all alternatives, adjust zoning capacity to take into account the potential for the city to acquire land that achieves the LOS of Parks as outlined in Exhibit 1.6-27

Chapter 2

61. 2, generally: please revise numbering to follow nomenclature used in other sections (3,4, etc.)

62. 2-4: please correct Exhibit to provide the place type 'Neighborhood Residential' under Alternative 1 place types. The change in name already existed before the beginning of the Comprehensive Plan process.

63. 2-42-11: please provide the required information in the EIS to show compliance with the Environment and Climate Element of the GMA, which the City voluntarily agreed to follow

64. 2-19: please study the impact of removing FAR for all Neighborhood Residential Zones

65. 2-20: revise bullet point two to allow for up to six-story single flat configurations

66. 2-30: revise Alternative to provide a consistent minimum area for each urban center designated.

67. 2-30: in addition, please revise map to designate urban centers ¾ mile around each studied ST3 station location.

68. 2-33: please study impact of condensing all Lowrise zoning to highest possible use (LR3)

69. 2-33: please study the impact of condensing all Neighborhood Residential into one zone with a minimum lot size of 2500sf.

70. 2-34: Please study an alternative for Neighborhood Residential with a capacity limit that is in line with up to six stories on all lots and a lot coverage of 50%, in compliance with current building codes that allow wood-frame construction and single stair building up to six stories and would allow for six-unit flats on a lot.

71. 2-40: Please revise Alt 5 to truly represent a combination of alternatives 2, 3, and 4. The resulting alternative 5 should be no less than 140,000 units, or, in alignment with following comments, no less than 314,000 units (158,000 units planned for each alternative)

72. 2-48: the PSRC already acknowledges that Seattle has a housing and jobs imbalance. Please correct all Alternatives studies so that the minimum number of housing units projected is no less than the number of jobs projected

73. 2-48: the PSRC identifies a jobs / housing balance of 1.3 to be ideal for all jurisdictions within King County. That would mean planning for an increase of at least 209,670 housing units as compared to 158,000 jobs. Please study at least one alternative with a **projected** number of units that exceeds 210,000 housing units.

225-4

74. 2-51: please revise the numbers in the comparison tables, Exhibits 2.4-31 and -32. There is no reason the numbers should be the exact same in all the alternatives studied.

75. 2-56: please correct this section to acknowledge that delaying action would also put the City in non-compliance with state requirements.

225-4 cont

Chapter 3 Environment

3.1 Earth & Water Quality

76. 3.1-15: Provide information as to mitigation strategies for areas that will see a significant sea level rise by 2100.

77. 3.1-16: revise Alternatives to increase density in areas ranked either 4, 3, 2, or 1 in terms of Burden Levels

225-5

3.2 Air Quality & GHG Emissions

78. 3.2-17: how is the location of Sensitive Populations factored into the placement of new housing in all studied alternatives?

79. 3.2-21: how do the City's 2030 targets factor into estimates of housing production?

80. 3.2-24: please include GHG per capita numbers below each alternative

81. 3.2-25: please study alternatives that provide additional height and density away from the 200 meter buffer outlined in paragraph 2

82. 3.2-29: for Exhibit 3.2-7, please provide per capita numbers for all alternatives studied

225-6

3.3 Plants & Animals

83. 3.3-5: why are tree management units by zone type and not by Subarea?

84. 3.3-8: please provide additional information that makes it clear that 6PPD-quinone originates from tires

225-7

3.4 Energy & Natural Resources

85. 3.4-7: Please provide a comparative Building EUI for single-family homes based on existing energy data

86. 3.4-10: How does the Transportation Plan factor into these #s?

87. 3.4-21: there seems to be an error in the naming of Exhibit 3.4-9

225-8

3.5 Noise

88. 3.5-28: Please provide information that acknowledges the impact that a lack of air conditioning and need for passive cooling strategies (i.e. open windows) has on noise pollution in neighborhoods along arterials

225-9

3.6 Land Use Patterns & Urban Form

89. 3.6-12: please provide clear language that acknowledges the continued racism and exclusionary practices continued by the Urban Village Strategy and provide clear differences between this plan and the previous one to address this history.

90. 3.5-19: please study capacity increases equivalent to eliminating all setbacks in multifamily such that buildings are regulated solely by fire separation requirements per the Seattle Building Code.

91. 3.5-19: please study capacity increases equivalent to reducing all upper setbacks to no more than 10 feet; removal of corner setback requirements; and reducing front setbacks on neighborhood residential 0 feet.

225-10

92. 3.6-21: please study capacity increases equivalent to 50% coverage of lot area for all Neighborhood Residential zones

93. 3.6-107: how are the overcast nature of most times of year in Seattle along with the increasingly hot summers factored into concerns around shadows?

94. 3.6-117: please revise all Exhibits so that place types align with new proposed place types (Regional Center, Urban Center, Neighborhood Center)

95. 3.6: for all alternatives, raise urban village zoning to a minimum of orange (85ft) and all and all urban centers to red (120ft)

96. 3.6-138: per Exhibit 3.6-93, why is the future AU/acre much lower at NE 130th as compared to 15th & 145th even though they are the same Place Type?

97. 3.6-139: please condense all zoning at 15th & 145th to study the highest potential capacity

98. 3.6-146: per Exhibit 3.6-98, the numbers in Alt 4 are the exact same as Alt 2

99. 3.6-161: per Exhibit 3.6-108, the numbers in Alt 4 are the exact same as Alt 2

100. 3.6-170: To provide increased equity, please study and revise capacity so that all Residential Urban Centers have an AU/acre of at least 50, all Hub Urban Centers have an AU/acre of at least 80, and all Regional Centers have an AU/acre of at least 150 for Alternative 5.

101. 3.6-175: Per Exhibit 3.6-115, please provide revised zoning and study additional capacity here that increases the Future Activity Units per Acre to above 70 or as much as 15th & 145th.

102. 3.6-182 Land Use Patterns & Urban Form: Please explain the justification for requiring transitions and the deference to single-family homes given the current housing emergency

103. 3.6-186 Housing: Please provide additional justification for continuing the "Urban Village" strategy under a new name given the research and confirmation by the RET Racial Analysis that the strategy has continued the racist redlining of Seattle's past in a new form and has been insufficient to solve the City's housing affordability emergency, which was declared in 2015.
("*All alternatives would focus most future growth into existing urban centers and villages*.")

225-10 cont

3.7 Relationship to Plans, Policies, & Regulations

104. 3.7-20 Housing: Per the "Housing" section of Exhibit 3.7-9, please confirm and provide one alternative that achieves the County's goals for housing targets by affordability for all affordability bands at and below 80% AMI.

105. 3.7-26 Housing: Please provide and study a Regional Center located in the South End, as requested by a number of members of the South End Community.

225-11

3.8 Housing

106. 3.8-4 Housing: Given the correlation between denser housing and more racial diversity, please provide a map with zoning changes intended to allow for more dense housing in subareas that have a significantly higher percentage (above 5%) of 'White, Non-Hispanic' than the Seattle average, namely Areas 1, 3, and 6.

107. 3.8-31 Housing: Please provide a map for each alternative that clearly identifies new zoning types and related increases in density in areas with a low risk of displacement as compared to those with a high risk of displacement.

108. 3.8-45 Housing: For Exhibit 3.8-41, how does the total projected new income-restricted units for each alternative compare to the current deficiencies identified in the EDI Community Indicators Report (September 2020)?

109. 3.8-47 Housing: For Exhibit 3.8-44, please provide strategies or increase the number of allowed housing units in Alternative 5 in order to reduce the 'ratio of net new units to units demolished' to a number than is lower than Alternative 3.

225-12

3.10 Transportation

110. Please clearly outline in the Final EIS how the Comprehensive Plan achieves Policy T4.2, a 20% reduction in VMT by 2030

111. Please revise LOS standards to move to VMT and revise Comprehensive Plan Policies T9.7 and T 9.8 accordingly.

225-13

112. 3.10-5 Transportation: For Exhibit 3.10-2, please provide justification for maintaining an SOV mode share of '38%' for Subarea 4 as compared to other Subareas, given its proximity to two major Regional Centers. Can this number be reduced to 30%?

113. 3.10-41 Transportation: For Exhibit 3.10-22, please provide separated LOS for Freight vs. HOV vs. SOV.

114. 3.10-101 PM Peak Hour Mode Share-Alternative 5: Please provide information as to what steps or adjustments need to be made in order to achieve SOV Targets in all Subareas studied. Currently it appears that Subarea 7 does not comply regardless of Alternative.

115. 3.10-114: If you're going to provide a Sensitivity Test, please do so for all alternatives studied.

116. 3.10-129 Transportation: Please provide a matrix that shows LOS and VMT (both total and per capita) of all studies alternatives crossed with the studied transportation plan alternatives

225-13 cont

3.11 Public Services

117. Please provide additional information in the Final EIS that addresses the City's capacity to deal with extreme weather events, including but not limited to a major earthquake event.

118. 3.11-3 Public Services: for Exhibit 3.11-1, please either revise to only show the number of sworn officers from 2017 to 2022 or revise later exhibits to provide data all the way back to 2012. The information as shown currently is misleading.

225-14

119. 3.11-61 Schools: please provide revised estimates that consider the projected number of students adjusted based on the expected number of family size units to be created through all studied alternatives.

Chapter 4 – Acronyms & References

120. 4.2 References: Please add references and include the following items in your research as part of the Final EIS:

a. The Department of Commerce HB 1110 Model Ordinance for cities 25,000 and over
b. The Urban Institute's Research Report – Unifying Upzoning with Affordable Housing Production Strategies: Advancing Access to Housing in Washington State
c. The American Enterprise Institute's Research Report – Expanding Housing Supply with Light-Touch Density: City of Seattle Case Study
d. The Seattle Planning Commission Issue Brief – Growth Strategy (February 2022)
e. The Seattle Planning Commission Issue Brief – Anti-Displacement (March 2022)
f. The Seattle Planning Commission Issue Brief – Repurposing the Right-of-Way (November 2022)
g. The Seattle Planning Commission Issue Brief – Affordable Housing (November 2022)

225-15

h. The Seattle Planning Commission White Paper – A Racially Equitable & Resilient Recovery (August 2020)
i. The Seattle Planning Commission White Paper – Evolving Seattle's Growth Strategy (Winter 2020)
j. The Seattle Planning Commission Report – Neighborhoods for All (Fall 2018)

225-15 cont

121. 4-43: Please fix the broken link to the Market Rate Housing Needs and Supply Analysis. I am assuming this is the 2021 BERK Report, however this cannot be confirmed. If it is not, please include that report in your research for this final EIS.

Chapter 5 – Appendices

122. B – Detailed Estimated Growth by Alternative: can you please provide the missing information?

123. C – Infill Exemption Summary of Law & List of Codes as Mitigation: can you please provide the missing appendix?

225-16

124. D – Air Quality & GHG Appendix: can you please provide the missing appendix?

125. E – Energy Appendix: can you please provide the missing appendix?

126. F – Noise Appendix: can you please provide the missing appendix?

127. G – Land Use Appendices: can you please provide the missing tables?

128. G – Land Use Appendices: can you please provide a draft future zoning land use table? These zones should be in line with the proposed city types: Regional Centers, Urban Centers, Neighborhood Centers, Neighborhood Residential, Industrial, et. Al

129. H – Transportation Appendices: can you please provide the missing information for both the Pedestrian Master Plan as well as the Bicycle Master Plan?

Feel free to email me back for questions. In line with the requirements of the EIS as part of the Comprehensive Plan Process and per the Growth Management Act, I look forward to responses to all of my comments as listed above.

Thank you,

Andrew Grant Houston, AIA NCARB CPHD
District 3 Resident – City of Seattle

From: Suzanne Grant
To: PCD_CompPlan_EIS
Subject: One Seattle Plan comments
Date: Monday, May 6, 2024 2:10:26 PM

CAUTION: External Email

ONE SEATTLE PLAN

I would like to submit the following comments regarding the One Seattle Plan.

I support Alternative 2 as The Plan.

Alternative 2 would have the lowest potential for development-related impacts to vegetation (including loss of tree canopy cover) citywide. 226-1

Based on the anticipated amount of area likely to be redeveloped, Alternative 2 would have a lower potential of leading to increased delivery of stormwater contaminants to streams.

However, on p.3-3-30, saying that "none of the action alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover" is not backed up by facts but speculative at best. The Plan states: “development projects on parcels in the Neighborhood Residential or Multifamily management units are likely to result in more loss of tree canopy, compared to development on parcels in other management units. This is particularly true of parcels with lower-density residential designations, where existing canopy cover is higher than elsewhere. As such, strategies that convert parcels with lower-density residential designations to higher-density designations could reduce the total amount of tree canopy cover in the city.”

Some questions that need answering are:

1. Considering the fact that the trees being removed are larger than the ones being planted and it will take many years to replace the current trees, what is your estimation of tree planting needs and a time frame to replace the equivalent lost canopy area and volume?

2. What is the acreage available and suitable for planting trees in the City’s public areas?

3. What is the available acreage available to plant trees on private property?

• Canopy volume, especially of coniferous trees during our rainy season, are critical factors in reducing stormwater runoff. What is the projected loss in canopy volume over the next 20 years as big conifer trees are removed?
5. What is the projected increase in stormwater runoff and what costs are associated with on site and alternative city water management policies of stormwater and pollutant runoff as a result?

Although the provision for 30% tree canopy is retained in the draft Plan, reaching the target date by 2037 needs to be put back into the draft, as well as attaining a tree canopy goal of 40% over time, which has also been removed from the draft Plan. On p.3-3-12, the Plan states: “Based on the potential for reductions in canopy cover, projects that entail tree clearing could slow progress toward achieving the City’s canopy cover goal.”

There seems to be an opinion amongst some that we cannot have both trees and houses, but we CAN. Although the Plan states that “the City’s current tree protection regulations minimize the potential for development-related loss of tree canopy cover and require mitigation for such tree loss,” there are serious omissions in the Tree Ordinance. The Plan needs to correct these omissions by specifying dedicated tree retention and planting areas that will require saving more existing trees, especially mature trees, on building lots. To stop lot sprawl, the Plan needs to give SDCI Director the ability to ask for alternative site design. The Plan needs to have a provision to review and amend the Tree Ordinance to (1) require developers to submit a tree inventory before taking any action on the lot, (2) remove

the “basic tree protection area” that allows developers to unnecessarily remove almost all large trees on lots, and (3) the Tree Ordinance needs to apply to all City land use zones.

The Plan needs to require all housing built, including building additions of any size and ADU's, to plant street trees with trees of larger sizes than currently allowed on sidewalk strips being allowed if there are no wires overhead.

226-1 cont

Increasing access to trees and clean natural spaces for people everywhere is something we all agree on. Biden’s Inflation Reduction Act includes an investment in urban tree planting of $1.5 billion. Part of his Justice 40 Initiative ensures that 40 percent of the benefits reach communities that are disadvantaged or nature deprived. The Plan needs to specify that affordable housing and multifamily housing have trees and parks nearby.

The Plan needs to authorize the use of Parks Impact fees to create more parks, especially pocket parks, in neighborhoods across the city. The Plan needs to authorize the use of Transportation Impact fees to create more tree-lined streets.

Urban trees are valuable for so many reasons. They reduce surface temperatures and storm runoff (helping to protect our salmon). They cleanse the air and improve residents’ mental and physical health. There’s even a correlation with public safety, an issue which is SO important to Seattleites: Neighborhoods with more street trees have lower crime rates. Expanding urban tree cover is truly an issue of environmental justice and equity.

Thank you.
Suzanne Grant
2723 4th Ave W
Seattle, WA 98119

DEIS StoryMap Comment

Name: Lynn Graves

Email: lyngraves@comcast.net

Date: 5/6/2024

Comment:

Comments on Seattle Comp Plan Draft EIS

The Draft EIS lists likely 'local' adverse impacts in the categories Earth and Water Quality, Air Quality and GHG Emissions, and Plants and Animals:

227-1

Increased hard surfaces
Decreased vegetation
Increased total emissions at a local scale
'Temporary' (increased) emissions from construction (please define temporary)
Exposure of population living in new buildings near high volume roads to air pollution
'Moderate' loss of tree canopy

However, it states there is "No significant adverse impact" in these categories. The reason given is that the entire region (by the way, what region is being referred to?) will benefit or at least is not worse off. Why is a theoretical regional benefit assumed to be desirable at the cost of worsening conditions in Seattle? Shouldn't there be more discussion of this? It is important to maintain a healthy environment in Seattle for people, plants and animals and this does not have to be at the expense of a healthy regional environment.

The Draft EIS finds "Moderate adverse impacts" from Noise:

Increased construction noise
Increased transportation noise
More people living near/exposed to noise of transportation corridors

However, it states that the impact "can be adequately mitigated". This is misleading and likely false, based on my experience with construction noise in my neighborhood for the past decade.

The Draft EIS finds "Potential for significant adverse impacts" on Cultural Resources and Transportation. I agree with these findings.

Under Public Services it mentions that "Additional park space would be needed to maintain existing park level service …" The important question would be: will the increased development be allowed to go forward without improving/increasing park space and services.

In addition, I don't think the Draft EIS addresses the issue of higher summer temperatures in the city due to more buildings, paved surfaces, and fewer trees and gardens. The environmental (e.g. more need for air conditioning) and health impacts of this deserve consideration.

Thank you for considering my comments.
Lynn Graves

Letter 228

From: Emily Green
To: PCD_CompPlan_EIS
Subject: Seattle One Plan feedback
Date: Friday, April 26, 2024 5:02:16 PM

CAUTION: External Email

Hello,

I am writing to express my disappointment with the Seattle one plan. The plan put forward by the mayor's office lacks any kind of vision of the future or awareness of the current state and future realities of housing in Seattle.

228-1

I was born in Seattle and am a life-long pacific northwester. I am in my 30's, single, and work as a prenatal healthcare provider at the UW medical center. I am immensely fortunate to be able to take public transportation to work, however that decision has also constrained where in the city I can live. I value so much about Seattle - the neighborhoods, the walkability of so many areas, the natural beauty. However, as I look at the current and future housing situation, I strongly doubt my ability to remain in this city long term. The mayor's proposal maintains the current status quo and demonstrates that this government does not value me or my contemporaries as residents of this city. It does not seek to make this city more affordable or attractive to myself, my other early-career co-workers, or my similarly situated friends.

I was fortunate to live for many years in Europe, in cities where the majority of residents are long-term renters in apartments. These cities are walkable, with easy access to local events and venues. Each neighborhood has a community center and pool, which are actively used by all generations. Fewer cars on the roads means more room for trees and plants. While homelessness exists, it is nowhere near the proportions in Seattle. When friends from Europe visit I warn them ahead of time of the situation here and they are still shocked. Affordability does not mean that only "undesirables" can live in a city, it means that nurses, teachers, cashiers at stores, the people who clean the mayoral offices and clean the streets can live in the city, instead of spending hours of their life in traffic, hours which could be spent with their families or communities. Why is Seattle not striving for a vision of the future which values these people? Renting is not a bad word in the rest of the world, but Seattle seems to think that renters are nothing more than transitory nuisances, not deserving of a stable-living situation and certainly not of buying an apartment or home in this city. With obesity and poor health on the rise, why not make it easier for people to walk to buy groceries, bike to their gym, or use any other means of transportation than a car to get around? And given all of the predictions about increased migration to Washington and the Seattle area, migrations which are likely to be made even worse by climate change, why does this administration continue to attempt to put up gates and walls around those few lucky and wealthy enough to have bought a home? Shame on the mayor and his team for having so little vision of the future, but thank you for making your contempt of me and my generation so clear.

Emily Green

DEIS StoryMap Comment

Name: Connor Griffin

Email: griffin75006@gmail.com

Date: 4/22/2024

Comment:

I'd like to se the city study some different options for industrial areas like SoDo and Interbay. These areas take up a huge area of our city and include a lot of vacant land. It seems foolish not to study the possibility of transforming these areas into mixed-use walkable neighborhoods, allowing conversion of warehouses into cheap housing, more areas for low-cost art and music venues etc. Leaving them out of all five alternatives is a mistake.

229-1

DEIS StoryMap Comment

Name: Connor Griffin

Email: griffin75006@gmail.com

Date: 4/22/2024

Comment:

I'd like to see the city get more creative with ways to increase density and greenery simultaneously. We can have both! Removing parking mandates citywide would allow a lot more greenspace, as would adding more meridians in the middle of busy streets, and removing onstreet parking to expand planting strips in sidewalks. I'd also like the city to study developer incentives for green roofs and walls, and incentives for keeping on-site trees. What would be the effect of unlimited building height and FAR in exchange for keeping onsite trees? I'd like to see these options studied in the EIS

230-1

DEIS StoryMap Comment

Name: Connor Griffin

Email: griffin75006@gmail.com

Date: 4/22/2024

Comment:

I'd like Seattle to be much more walkable, meaning building many more homes near businesses and businesses near homes. I'd like the EIS to study much taller buildings in neighborhood centers, urban centers and regional centers, including an option of unlimited building height in these areas. I'd also like to study significantly expanding neighborhood enters to 1/4 mile radius instead of 800 feet and and study many more than the 42 neighborhood centers in alternative 5. Research shows more than 80 of these business clusters in Seattle already. I'd also like to study zoning for small retail and cafes citywide.

231-1

Letter 232

DEIS StoryMap Comment

Name: Connor Griffin

Email: griffin75006@gmail.com

Date: 4/22/2024

Comment:

I grew up in this city and I really would like the oportunity to settle down and raise a family here. I want my kids to be able to grow up around their grandparents. I'd like to be able to help my parents out as they get older. This comp plan is trying to force me out of my city and break up my family. I need you to study much bolder options if we are going to build enough housing for me to be able to afford to stay here. What about zoning for 5-storey aprtment buildings city-wide? What about planning for 200,000 new homes? What about 6-storey apartments within a 15 minute walk from transit? What about unlimited building height in regional centers, or even city-wide? What about 80 neighborhood centers instead of 24? Why not study an option that sees growth as an opportunity for Seattle to take its place on the world stage, rather than cower in fear and blindness?

232-1

DEIS StoryMap Comment

Name: Connor Griffin

Email: griffin75006@gmail.com

Date: 4/22/2024

Comment:

I'd like you to study the option of zoning for offices as well as housing and retail throughout the city. Everyone should be able to live within walking distance from work, and that can't happen if small to medium office buildings aren't allowed throughout the city.

233-1

DEIS StoryMap Comment

Name: Connor Griffin

Email: griffin75006@gmail.com

Date: 4/22/2024

Comment:

I'd like to you to study the boldest possible approach to the Duwamish River- what wouldit take to make it the crown jewel of our city instead of one of the most polluted places in the country? What would it take to restore native wetland along the entire course of the river, with walking trails for the public an vibrant walkable neighborhoods along both banks? What would be the benefits of doing so (I am guessing they would be tremendous)

234-1

Letter 235

From: Jonah Griffith
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 12:57:12 PM

CAUTION: External Email

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

235-1

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Jonah Griffith
jonah@objectcreative.com
7331 21st Ave NW
Seattle, Washington 98117

Letter 236

From: Katy Griffith
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 4:05:50 AM

CAUTION: External Email

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

236-1

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Katy Griffith
katygr@msn.com
2131 N 132nd Street
Seattle, Washington 98133

Letter 237

From: Barbara Gross
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 11:01:37 AM

CAUTION: External Email

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

237-1

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
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* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Barbara Gross
barbara.gross48@gmail.com
6536 44th Ave NE
Seattle, Washington 98115-7542

Letter 238

From: Mary Ann Gwinn
To: PCD_CompPlan_EIS
Subject: questions about comprehensive plan
Date: Monday, May 6, 2024 11:21:23 AM

CAUTION: External Email

The EIS for this plan seems seriously deficient. How is this even an EIS when it doesn't address key questions of the plan's likely impact?

Here are some questions/requests for more information. Please go back to the drawing board. thanks, Mary Gwinn/West Seattle resident. 238-1

1. Section P 3-3 states that “none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild.”This is a preposterous statement, given the amount of construction and disruption that will come with building new housing plants. What are the impacts on plants and animals of the alternatives.

2. Section P 3-3 states that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." Is there any information to support the notion that tree planting programs replace lost urban tree cover? For starters, trees take many years to replace, and many animals depends on older growth trees. Please revisit this assumption.

3. The plan states that Seattle will make progress toward its 30% canopy goal. The new tree ordinance substantially reduces private land available for trees. Please provide specific information on how much public land is available for tree planting and how many trees will need to be planted to replace those lost for development.

DEIS StoryMap Comment

Name: Steph Hagerty

Email: stevenhhagerty@gmail.com

Date: 4/28/2024

Comment:

239-1

I am a Seattle renter. The city should study the impacts and opportunities of the following:

Citywide elimination of parking minimums
Additional Neighborhood Centers in Urban Neighborhoods
Additional Neighborhood Centers off of arterials
Higher floor area ratios for Urban Neighborhood zoning
Higher growth targets for Alternative 5
Expanded highrise zoning in Regional and Urban Centers
Expanded highrise zoning in Urban Neighborhoods within 1 mile of parks >1 acre
Expanded highrise zoning in Urban Neighborhoods
Expanded highrise zoning at Neighborhood Centers
Expanded highrise zoning within a half mile of all light rail stations
Expanded highrise zoning around existing grocery stores
"Corner stores" allowed mid-block as well as on corners
Reforesting golf courses on tree canopy
Higher floor area ratios for middle housing in all residential zones, such as those corresponding to the state model code for middle housing
Social housing in every neighborhood on affordability
Greater height and density bonuses within a quarter mile of transit stops
Greater height and density bonuses within a half mile of transit stops
Increased building height allowances, in exchange for reduced lot coverage, on tree canopy
Granting tax breaks & fee deferrals to housing projects that include affordable units
Expanded highrise zoning in Regional Centers
Development incentives like additional floor area ratio for 2- and 3-bedroom units
Floor area ratio bonuses that incentivize stacked flat development rather than attached or detached townhomes
An Urban Center around the 145th light rail station

Of the available alternatives, I strongly prefer Alternative 5 with higher growth targets.

Letter 240

From: Cheyenne Haines
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 4:15:48 PM

CAUTION: External Email

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

240-1

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
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Mitigation recommendations:

* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Cheyenne Haines
cheyenneautumnh@gmail.com
8558 19th Ave NW
Seattle, Washington 98117

From: Mark Hammarlund
To: PCD_CompPlan_EIS
Subject: Comment on Comprehensive Plan EIS
Date: Thursday, April 11, 2024 8:34:43 PM

CAUTION: External Email

Comment:

Thank you for the presentation of the EIS on April 11, 2024. I am writing to offer a suggestion pertaining to the "Adverse Impact" associated with Alternative Five, described in the EIS as "low level sidewalk connectivity." The City owns 40 feet of right-of-way on Roosevelt Way from 3rd NE to Aurora Ave. Sidewalk connectivity could be increased by adding bike lanes and pedestrian lanes on the shoulders of this roadway, with ditches replaced by covered culverts.

This section of Roosevelt Way was severed in 1962 from the busy portion of Roosevelt Way when I-5 was built. Often described as the "Ghost Portion of Roosevelt Way," this diagonal roadway has been submitted by SDOT to be considered for delisting as an arterial; delisting would allow for calming measures including speed bumps. (One speed bump is already in place on this "Ghost Portion" of Roosevelt Way, located southeast of 1st NE.)

Thank you for considering my suggestion.

241-1

Mark Hammarlund
2121 N. 143rd St.
Seattle WA 98133

From: Mark Hammarlund
To: PCD_CompPlan_EIS
Cc: Laura Baumgartner; Pollet, Henry
Subject: an idea for consideration for the One Seattle Plan
Date: Monday, April 15, 2024 7:59:14 PM

CAUTION: External Email

Dear One Seattle Planners,

I live in north Seattle near the two light rail stations under construction at 130th and 148th streets. I support Option Five for density, for two basic reasons: 1) To support the development of additional low-income housing in Seattle, and 2) to lower the carbon footprint of residents in the Puget Sound area. By tolerating greater density, perhaps our society can salvage the ecology of Puget Sound and the Cascades while providing greater social economic and racial equity with respect to housing. It is time for north Seattle to play its part in providing more housing particularly around light rail stations.

I have a recommendation:

I have learned that the Haller Lake United Methodist Church at 133rd and 1st Ave. NE also supports Alternative 5 of the EIS. Their church has property that they would like to subdivide. However, they need a revision of DEIS to include NC-55 zoning for the church property, in oder to accomplish their goals. Their intention to subdivide pertains to Lots 3, 4, and 5 of block 65, in the H.E. Orr Park Division No. 6. 242-1

This zoning revision would mean that the housing units could have small businesses on the ground floor. The One Seattle Plan calls for just this sort of development for land parcels located within 2 or 3 minutes of walking distance from light rail stations. The One Seattle Plan calls for new "Neighborhood Centers" exactly in line with the vision offered by the Haller Lake United Methodist Church.

Please consider making this zoning change.

Thank you,

Mark Hammarlund

2121 N. 143rd St.
Seattle WA 98133
206 361 6206

cc. Pastor Laura Baumgartner, Haller Lake United Methodist Church
Cathy Moore, Seattle City Councilmember
Henry Pollet, assistant to Cathy Moore

Letter 243

From: Judith Hance
To: PCD_CompPlan_EIS
Subject: Comments on plan
Date: Friday, May 3, 2024 9:48:31 AM

CAUTION: External Email

I am devastated by this dangerous plan.
Trees are vital to protect our city and our homes.
Allowing trees to be cut down for building is totally wrong!

I have a big lot and have planted many trees and shrubs over the years.
They help to keep my home cooler in the summer without having air conditioning, which would use more power! I open up my house at night for the cooler air, and close it first thing in the morning. 243-1

I have been appalled at the many houses being built in Seattle withou leaving any room for trees.
Our tree canopy is shrinking, when the opposite should be happening.
New sidewalks, good in many ways, but they add more hard surface to absorb and radiate heat.

Who came up with terrible ideas that will make residents more vulnerable to the increasing heat and drought. over the years.
What about the children who have years and years ahead of them?

I have a large lot, and plan to stay in my home until I die. I don't want to know about the destruction of my plants and the increased risk to the birds and animals in my area.

I'm glad I won't be here to get my heart broken and see what happens after following such a plan.

Good Grief!!!!! How can you be so ignorant about how to live into the future?

Judith Hance,
Seattle since 1991

Letter 244

From: Nancy Hannah
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS: Trees are so important for keeping us cool, and reducing carbon in atmosphere , and general well being of all of us. The other thing to consider is that they take a long time to get to the growth that will really make a diffe...
Date: Monday, May 6, 2024 9:33:02 AM

CAUTION: External Email

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

244-1

Mitigation recommendations:

* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Nancy Hannah
nancyhannah75@gmail.com
7526 27th Ave. NE
Seattle, Washington 98115

From: Don Harper
To: PCD_CompPlan_EIS; LEG_CouncilMembers
Subject: One Seattle Plan-Comment
Date: Monday, May 6, 2024 3:55:49 PM
Attachments: One Seattle Plan-Comment.pdf

CAUTION: External Email

My comments are attached and copied into the body of this email. I am not sure which works best for you.

ONE SEATTLE PLAN

I support Alternative 2 as The Plan.

Alternative 2 would have the lowest potential for development-related impacts to vegetation (including loss of tree canopy cover) citywide. Based on the anticipated amount of area likely to be redeveloped, Alternative 2 would have a lower potential of leading to increased delivery of stormwater contaminants to streams. More trees need to be planted in the areas with a lack of tree canopy instead of the absurdity of removing trees from areas that have a higher amount of canopy that is currently helping to mitigate the effects of climate change.

245-1

However, on p.3-3-30, saying that "none of the action alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover" is not backed up by facts but speculative at best. The Plan states: "development projects on parcels in the Neighborhood Residential or Multifamily management units are likely to result in more loss of tree canopy, compared to development on parcels in other management units. This is particularly true of parcels with lower-density residential designations, where existing canopy cover is higher than elsewhere. As such, strategies that convert parcels with lower-density residential designations to higher-density designations could reduce the total amount of tree canopy cover in the city."
Some questions that need answering are:

1. Considering the fact that the trees being removed are larger than the ones being planted and it will take many years to replace the current trees, what is your estimation of tree planting needs and a time frame to replace the equivalent lost canopy area and volume?
2. What is the acreage available and suitable for planting trees in the City's public areas?
3. What is the available acreage available to plant trees on private property?
4. Canopy volume, especially of coniferous trees during our rainy season, are critical factors in reducing stormwater runoff. What is the projected loss in canopy volume over the next 20 years as big conifer trees are removed?

5. What is the projected increase in stormwater runoff and what costs are associated with on site and alternative city water management policies of stormwater and pollutant runoff as a result?

Although the provision for 30% tree canopy is retained in the draft Plan, reaching the target date by 2037 needs to be put back into the draft, as well as attaining a tree canopy goal of 40% over time, which has also been removed from the draft Plan. On p.3-3-12, the Plan states: "Based on the potential for reductions in canopy cover, projects that entail tree clearing could slow progress toward achieving the City's canopy cover goal."

245-1 cont

There seems to be an opinion amongst some that we cannot have both trees and houses, but we CAN. Although the Plan states that "the City's current tree protection regulations minimize the potential for development-related loss of tree canopy cover and require mitigation for such tree loss," there are serious omissions in the Tree Ordinance. The Plan needs to correct these omissions by specifying dedicated tree retention and planting areas that will require saving more existing trees, especially mature trees, on building lots. To stop lot sprawl, the Plan needs to give SDCI Director the ability to ask for alternative site design. The Plan needs to have a provision to review and amend the Tree Ordinance to (1) require developers to submit a tree inventory before taking any action on the lot, (2) remove the "basic tree protection area" that allows developers to unnecessarily remove almost all large trees on lots, and (3) the Tree Ordinance needs to apply to all City land use zones.

The Plan needs to require all housing built, including building additions of any size and ADU's, to plant street trees with trees of larger sizes than currently allowed on sidewalk strips being allowed if there are no wires overhead.

Increasing access to trees and clean natural spaces for people everywhere is something we all agree on. Biden's Inflation Reduction Act includes an investment in urban tree planting of $1.5 billion. Part of his Justice 40 Initiative ensures that 40 percent of the benefits reach communities that are disadvantaged or nature deprived. The Plan needs to specify that affordable housing and multifamily housing have trees and parks nearby.

The Plan needs to authorize the use of Parks Impact fees to create more parks, especially pocket parks, in neighborhoods across the city. The Plan needs to authorize the use of Transportation Impact fees to create more tree-lined streets.

Urban trees are valuable for so many reasons. They reduce surface temperatures and storm runoff (helping to protect our salmon). They cleanse the air and improve residents' mental and physical health. There's even a correlation with public safety, an issue which is SO important to

Seattleites: Neighborhoods with more street trees have lower crime rates. Expanding urban tree cover is truly an issue of environmental justice and equity.

245-1
cont

Thank you.

Don Harper
(206) 281-9018

DEIS StoryMap Comment

Name: Sabina Havkins

Email: sbhtennis@gmail.com

Date: 3/16/2024

Comment:

My concerns and questions -
Has The Thornton Creek Watershed been considered in these growth plans. It is very close to the 130 th and 145 th street area. Protection of that watershed from increased population is essential
If the city can't address the lack of adequate police officers now how will it handle the increase in population in the future ?
Are there adequate safeguards in place for bike storage for commuters at the urban centers and Light Rail stations? Theft is rampant.
How will the trails around the outside of Jackson Park be protected? How will these trails be maintained?
How will these trails be kept safe from homeless encampments?
How will parks along Lake City Way be kept free of drugs and …. which are current issues.
How will there be adequate funds for maintenance of parks lands .
Current landscapes near local elementary schools are growing" wild". After being rebuilt the Olympic Hills elementary school does not seem to have any funding for the maintenance of its landscapes. Will this occur with other new schools built

246-1

246-2

DEIS StoryMap Comment

Name: Caroline Hedlund

Email: hedlca@uw.edu

Date: 4/10/2024

Comment:

I am a renter in U-District, and I believe that the City of Seattle did not listen to the overwhelming majority's call for an Alternative 6 vision, which would enable the creation of more walkable neighborhoods. Instead the current draft plan will worsen the many crises (housing, climate, unaffordability) our city faces. To create a more vibrant city, the plan should add many more 'Neighborhood Centers', especially in Urban Neighborhoods.

247-1

If the City of Seattle adopted my above proposed changes, then we would be able to reduce rates of homelessness.

DEIS StoryMap Comment

Name: Troy Heerwagen

Email: gmwoo.lj@gmail.com

Date: 4/16/2024

Comment:

The city should study the impacts of Additional Neighborhood Centers off of arterials. Of the available alternatives, I strongly prefer Alternative 5 with higher growth targets.

248-1

Letter 249

From: Anna Hill
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Wednesday, May 8, 2024 11:52:43 PM

CAUTION: External Email

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

249-1

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
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* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Anna Hill
anna.hill.206@gmail.com
2711 N.E. 105th St.
Seattle, Washington 98125

DEIS StoryMap Comment

Name: Carl Hiltbrunner

Email: subscribe+seattle@carl.hiltbrunner.email

Date: 4/23/2024

Comment:

The Comprehensive Plan sets a goal of ensuring equitable internet access for all residents of Seattle. Is there broadband capacity to accommodate this growth, but also ensure 150/150 broadband speeds for all, per the RCW 43.330.536 state-level goal definitions? 250-1

From: William Holland
To: PCD_CompPlan_EIS
Subject: More agressive comp plan please
Date: Monday, May 20, 2024 5:00:18 PM

CAUTION: External Email

Please rework the comp plan to expand housing capacity across the city and not just in isolated pockets and along car-choked arterials. I am embarrassed for Seattle to hear Rep. Jessica Bateman call our plan "underwhelming" and Rep. Julia Reed call it "the minimum." The majority of Seattleites would love for rent prices to stabilize or come down. Everyone would benefit from the inherent eco-friendliness of denser housing with nearby amenities. We welcome more housing stock!

251-1

Letter 252

From: DEBORAH HORN
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS for One Seattle Comprehensive Plan
Date: Monday, May 6, 2024 3:32:58 PM

CAUTION: External Email

Comments Planning and Community Development EIS,

Dear Council Members and Mayor Harrell,

I have been a Seattle resident since 1981, and have watched the tree canopy slowly (and more recently - quickly) disappear during this time. What this amounts to is a loss of the character and livability in Seattle, nothing less. I've also been an active citizen of Seattle, and am thinking back to when there was a big clash between developers of the Northgate area that is now Thornton place and the people like me who wanted to see the headwaters of Thornton Creek daylighted. What I learned from that experience it that developers can do the right thing if they have to, and it doesn't cause them much pain either. The Creek is daylighted and it is an amenity that makes the real estate more desirable. 252-1

We are asking again that the City Council do the right thing and require developers to retain big trees as much as possible. You have the specifics in other letters from people like me, but I want to emphasize one mitigation action in particular:

"Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees."

Please require designs to incorporate existing trees on lots as much as possible. Both sides can win this way, and that makes the decision-makers look good. This is not as onerous as developers would have us believe. In the end, the trees make the property more valuable, not less. Often, the alternative doesn't even affect the total square footage of building on the lot.

Thank you for considering these comments.

Sincerely,
Deborah Horn
1901 NE 135th St.
Seattle, WA 98125

DEBORAH HORN
artemis.gardens@gmail.com
1901 NE 135th St
Seattle, Washington 98125

From: Jared Howe
To: PCD_CompPlan_EIS; Morales, Tammy
Subject: Seattle"s draft comprehensive plan and the environmental impact statement
Date: Thursday, May 2, 2024 7:14:02 PM

CAUTION: External Email

To whom it may concern,

Please consider alternatives 2 and 4.

According to Section P 3-3, the plan is not anticipated to cause any adverse effects that would diminish the chances of survival or recovery for plant or animal species in the wild. **How does this plan specifically influence the flora and fauna of Seattle?**

253-1

Section P 3-3 asserts that none of the alternatives are projected to yield substantial, unavoidable negative effects on tree canopy cover. **What research demonstrates that initiatives like tree planting programs, combined with expanded hardscape, will counterbalance the reduction in urban forest?**

The plan indicates Seattle's advancement towards its 30% canopy target. However, the new tree ordinance significantly diminishes the space on private land suitable for trees. **What is the extent of available public land to achieve the 30% goal? Additionally, how many trees must be planted annually in these areas to offset those removed due to development?**

Sincerely,
Jared Howe
Seattle, WA

Letter 254

From: Sam Hranac
To: LEG_CouncilMembers; PCD_CompPlan_EIS; Moore, Cathy
Subject: About the DEIS and the Comprehensive Plan
Date: Sunday, May 5, 2024 11:31:35 AM

CAUTION: External Email

I have serious concerns regarding the continued destruction of Seattle's canopy and building plans based on what I'm seeing in current city council actions.

Regarding the Draft Environmental Impact Statement :

1: Section P 3-3 states that “none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild.” What is the impact of the plan specifically on Seattle’s plants and animals?

2: Section P 3-3 states that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." What analysis shows that tree planting programs, coupled with increased hardscape, will compensate for lost urban forest? This assumption looks like a fantasy. 254-1

3: The plan states that Seattle will make progress toward its 30% canopy goal. The new tree ordinance substantially reduces private land available for trees. How much public land is available to reach the 30% goal? How many trees will need to be planted in these areas every year to make up for trees removed by development?

And about the Comprehensive Plan specifically as it impacts District 5:

The massive "neighborhood center" project planned for Roosevelt Ave NE and NE 90th in Maple Leaf is laughably named. It will destroy a large section of an established neighborhood, including existing homes and change the character of an established community.

I live next to a plot that had a small affordable home torn down to make room for 3 massive, ugly, high-priced housing units. (Despite being 3 units on a small lot, they will sell for well beyond a barista's salary. There is no way this is low cost housing.) This will not only disrupt the quality of the block in the future, but has proven to be a violation of our privacy and property rights all during the construction. 827 NE 98th St is a construction project where the workers have repeatedly walked over our property and tossed their food litter all over our yard from the beginning. Workers have also most often not worn safety equipment and broken other rules that appear to have no consequences when reported. They also ripped down an exceptional tree on the north side of the lot. The spot where the tree was still has nothing built on it, so I don't know why they had to do this. We managed to stop them from taking down two more exceptional trees on the east and west sides of the property, but they have repeatedly removed the "permanent" fencing that is supposed to protect those trees during construction. Currently, they have a table saw and a huge pile of lumber within the "protected area" of one tree. Again, the city does nothing about any of this. I have no doubt that any Comprehensive Plan/neighborhood center construction will be carried out with the same disregard for rules and promises as what I am seeing going on right next to me today.

Beyond all that, why destroy a lovely bit of neighborhood when there are under-utilized stretches of parking lot and office buildings much closer to the Northgate Transit Center? I

walk past the area of NE 100th and 1st Ave NE and see very few cars ever parked there. That area could contain one of these neighborhood centers without destroying a single home. It would be closer to transportation, and still very close to schools and shopping. The plan as it is is ridiculous.

Sincerely,
Sam Hranac
Maple Leaf

254-1
cont

From: Matt Hutchins
To: PCD_CompPlan_EIS
Subject: DEIS comments
Date: Sunday, May 5, 2024 7:55:53 AM

CAUTION: External Email

In short, the benefits of building a denser city far outweigh the temporary impacts during development. Increasing bulk isn't an impact, it is a feature of a lower carbon, more efficient city. We should lean into smarter, greener growth with:

255-1

- **Taller buildings in growth areas.** Around our light rail investments, tall buildings should be the norm. As job centers, they should be paired with enough zoned capacity to make thousands of homes there. For example, the new 130th Street Regional Center is stated to add only 1644 homes *(DEIS, page 1–77)*, but could be home to thousands more. And as Councilmember Morales has pointed out "…excluding the South End from intentionally planning for economic development opportunities…(will create)…deeper economic inequality." It is the natural progression for Seattle moving from a single downtown destination to a polycentric network where you can walk to your job or take transit to another neighborhood without ever going downtown.

- **Additional stories elsewhere.** Adding a story or two elsewhere has a marginal impact on the street, but these are the cheapest floors in any development already being built. In the rebranded Centers, 30' tall Residential Small Lot zoning should jump to 40' and 55' heights. This 4–5 story scale is the baseline for non-profit developers to build subsidized affordable housing, and also the scale at which we start to see for-profit developers provide affordable units under Mandatory Housing Affordability (MHA). There may not be the political will for the 5–8 story

urban streetscape of a Paris or Copenhagen, but more new development should hit that sweet spot.

255-1 cont

- **Zoning for Mass Timber.** Buildings made from mass timber, a low-carbon alternative to steel or concrete, can go up to 18 stories. We should optimize the zoning to match the building code and let the market produce green towers.

- **Zoning for more than Townhouses.** Granted, smaller homes are generally less expensive, but shorting middle housing will drive more projects into the typology we already have: 3 or 4 units on a parcel (like today's NR and RSL zoning). There is a strong market preference for townhouses and the city's approach will make it easier to build and sell those, but it leaves the extra capacity granted by HB1110 on the shelf unbuilt. To get the other types of middle housing, such as sixplexes, the update should factor in some bonuses for height, setbacks or floor area.

- **Reward extra units** The update should either allow for more bulk as you add units as an incentive like the State model code, or use a more basic unlimited density within the buildable area like Spokane's successful Building Opportunity for Housing program.

- **Don't count ADUs when counting density.** Over the last several years, ADUs have become popular because they have low barriers to permit and flexibility that fit many residential sites. The Update counts them against the 4/6 unit maximum per parcel, closing the code exceptions, like exemption from MHA, that makes them so popular (2500 ADUs in just the last three years). They are low-impact infill development and there is no reason to kneecap this housing type.

- **Solve for affordable housing.** First, the kinds of buildings funded and built for income-restricted housing are not low-rise middle housing in residential neighborhoods — they are largely 4–8 story mid-rises in growth areas. More urban centers need to be zoned for this scale of building. If we want affordable housing distributed throughout the city, we must repeat similar zoning in the new 'Neighborhood Center' place type.

- **Resist the urge to expand Mandatory Housing Affordability (MHA)** into zones we hope to build middle housing. ADUs (not subject to MHA) have exploded, up 217% over four years, versus townhouses (subject to MHA), which are off 77%. Builders will go where the barriers are lowest. A recent study by Shane Phillips about inclusionary zoning in Los Angeles illustrates that for every affordable unit inclusionary zoning creates, it costs 4–5 market rate ones. In the plan, OPCD studied expanding MHA into Urban Neighborhoods but only netted 3 more income-restricted units built on-site there (DEIS, pg 3.8.46).

- **Align the Affordable Housing Bonus building type with Habitat for Humanity and Seattle's Social Housing Developer**. The affordable housing bonus type (1 unit per 400 sq ft of lot and a FAR of 1.8) in the Updating Seattle Neighborhood Residental Zones documents might be more workable for those specialized builders if the affordability requirements mirrored their optimal pro formas. This is a natural alignment with the nascent social housing developer's publicly supported mission and the principles of the comprehensive plan.

- **Center new housing on parks and shorelines, less on arterials.** The health impacts of placing multifamily housing on arterials are well

255-1 cont

documented and disproportionately affect BIPOC and low-income residents. As a means to equitably increase access to nature, light, air, and recreation, the plan should prioritize housing around parks and shores.

- **Support Neighborhood Centers.** Just because the idea has been around, doesn't mean that it will be accepted easily. Actually, the fact that zoning hasn't changed at all around them for decades is proof of just how difficult it will be politically. Already between the scoping report and the draft plan, the number and area of the Neighborhood Centers have been clipped, from 42 to 24, and from roughly 3000 acres to somewhere around 1000 acres. Yet these zones supply some of the biggest growth, nearly 20,000 units under Alternative 5.

255-1 cont

- **Embrace Neighborhood Centers as '15 Minute' neighborhoods.** They support local jobs and services, mixed-use buildings, increases in the tax base and commerce, in walkable proximity both to new housing and existing neighborhoods. It is home to your favorite coffee shop or bakery, professional services like daycare, dentists, plus a library and grocery store. Every home we put into Neighborhood Centers fuels local business and keeps people out of cars.

- **Build out 'Low-Emission Neighborhoods'** that were promised in the Seattle Transportation Plan and under Executive Order 2022–07 and these Neighborhood Centers would be perfectly suited to lowering our per capita carbon footprint.

- **Lean into infill development to reduce carbon per capita over**

time. Doubling density reduces CO2 emissions from residential energy use by 35% and household travel by 48%. Beyond the Low Emission Neighborhoods mentioned above, we should align urban design and the housing market with climate change adaption.

255-1 cont

- **Remove parking mandates** (it doesn't mean parking won't be built). Parking requirements drive up the cost of housing, lock in carbon emissions, and require either expensive garages or extensive surface parking, taking space that could otherwise be used for vital tree canopy. In today's Neighborhood Residential zoning, we require one parking space per principal unit. If we allow more principal units, the number of parking spaces should be based on the discretion of the developer. In 2024, there is no reason to require parking in new urban development when cities like Olympia, Austin, and Raleigh have already done away with this antiquated requirement.

- **Go bigger to leverage lower carbon benefits of smart zoning.** It is not surprising that the most ambitious Alternative 5 is also the greenest: 20% less electricity demand per capita, 28% reduction in natural gas demand, and a 22% reduction in vehicle miles traveled (VMT) per capita.

As for commenting on the plan, annotating a PDF is labor intensive and not intuitive. I've opted for email.

--
Matt Hutchins, AIA CPHD
Principal - CAST architecture
115-C North 36th Street, Seattle, WA 98103
matt@CASTarchitecture.com
Direct: 206.360.8336
Office: 206.256.9886
website instagram facebook

From: K I
To: PCD_CompPlan_EIS
Subject: Comments on draft One Seattle Comp Plan EIS
Date: Monday, May 6, 2024 3:56:31 PM

CAUTION: External Email

Hello,

I choose alternative 2 for the alternative development scenarios proposed. I believe this is the best choice for giving growth while keeping climate impact considerations a high priority. I don't think it would be wise for us to compromise those impacts with any of the other alternatives. If we destroy our environment, what will be the point of our development? 256-1

Thank you for your consideration,

Kippy Irwin

Sent from my iPad

From: Steve Itano
To: PCD_CompPlan_EIS
Subject: Save our trees
Date: Friday, May 3, 2024 11:31:38 PM

CAUTION: External Email

All of the plans are written in so much legalese, that I cannot understand what the plans protect our trees. My Grandkids and all of the children on our block use to call the Kitty Tree

257-1

Now it and all of the other trees have been replaced by and 60 plus apartment building that has no parking.

Please explain to me and my grandchildren how you plan to mitigate this lost.

Your Truly
Steven Itano
9214 24th Ave SW
Seattle WA. 98106

From: GAYLE JANZEN
To: PCD_CompPlan_EIS
Subject: My Seattle One Comprehensive Plan Draft EIS concerns
Date: Monday, May 6, 2024 4:24:47 AM

CAUTION: External Email

To Whom It May Concern:
I have some questions and concerns regarding the EIS statement:
Section 3.3-30 states that "none of the action alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." I think all the Alternatives except 1 will definitely have a negative impact on our tree canopy. The new tree protection ordinance INCREASES the potential for tree removal and loss. The current guaranteed lot coverage of 85 - 100% for multifamily lots and above and rezoning to occur in the Neighborhood Residential zone means more trees, especially large ones, will be removed.

258-1

The EIS states: “Canopy cover decreased by 255 acres between 2016 and 2021—an area roughly the size of Green Lake. As canopy cover decreases, mature tree benefits like helping to keep our neighborhoods cool, helping to clean our air and providing homes to wildlife are diminished. The city is BELOW its goal for canopy cover. Total cover in 2021 was 28%, compared to a goal of 30%.” And this was **BEFORE** all the current building going on.
* So what exactly is your estimation of potential canopy acreage loss (over 5 year periods consistent with the city's canopy studies) with increased development and density in each alternative?
* Will it ever be possible to reach the 30% citywide goal and is there even a potential for more than 30% tree canopy in Seattle over time?
* Is up to 40% canopy coverage, over time, as proposed in the previous Comprehensive Plan even possible?
* Canopy volume, especially of coniferous trees during our rainy season, are critical factors in reducing stormwater runoff so what is the projected loss in canopy volume over the next 20 years as big conifer trees are removed? And what is the projected increase in stormwater runoff and what costs are associated with on site and alternative city water management policies of stormwater and pollutant runoff as a result?

If you really want to save our established trees, I urge you to consider implementing the following suggestions:
* Amend the Tree Protection Ordinance to require developers to maximize the retention of existing trees 6" DSH and larger.
* Allow and encourage the SCCI Director to ask for alternative site designs to save trees.
* Support building higher and building attached units to allow for tree retention and planting areas like Portland, OR has done, with 20% areas for multifamily and 40% for its 1-4 unit family zone.
* Amend Tree Protection Ordinance to require the Tree Protection Ordinance to apply to **ALL** city land use zones.
*** I think one of the most problematic issues affecting mature tree loss is the "basic tree protection area" loophole in the Tree Protection Ordinance that allows developers to unnecessarily remove almost all large trees on lots. This**

loophole needs to be removed as it makes all the talk about saving trees just words on paper!

* Developers need to be required to submit a Tree Inventory and how they will save as many trees as possible on any given lot. Currently they are given free reign to cut down trees with impunity.

I think the EIS is just more pie in the sky words that the policymakers think will appease the public when it comes to saving/increasing our tree canopy. It will take decades for any small, deciduous replacement trees to provide all the benefits of the mature trees that are currently being cut down. We shouldn't have to fight so hard to try to save the huge trees that currently offer so many benefits for free.

Sincerely,

Gayle Janzen

Seattle

258-1 cont

Letter 259

From: Jan Jarvis
To: PCD_CompPlan_EIS
Cc: Moore, Cathy; Staton, Renee
Subject: Comment on Draft Plan
Date: Monday, May 6, 2024 12:39:29 PM

CAUTION: External Email

Dear People,

Again , I read your criteria for the plan and again it fails to meet the lofty goals. Let's get right to equity. I live in Haller Lake, close to the 130th new station and and about an 11-12 minute walk to the 145th one. The algorithm used by the planners to give a 10-minute walk window was either was an average. As a senior citizen I could be expected to make tha average lower but the 130th Street Stations about 9 minutes and -as I said, the 145th Street one is a bit further. One would think that ALL this area—like Shoreline-from Meridian to the freeway would be up zoned. 259-1

However, again, equity, the idea that ALL citizens are equal lost to the statement by Lakeside School, that they were not interposed in having the area around them up zoned. Of course, we all know in the neighborhood that Lakeside has been buying up houses, in the beginning to house their teachers but also, like EVeryGreen School to the north, to plan for future expansion. And also of course, they do not want to pay their share of taxes on their acquisitions.

I live between the High School & the Middle School. I have an 860 sq. ft. little post-war box on a nearly 9000 sq.ft. lot. A prime example of poor zoning, I am not able to subdivide—no, I don't want to build an ADU. I want the property liquid for my children and myself. It could easily house six families in townhouses, all within reasonable walking distance to th light rail and even preserve some private yard area—or cottages—or a condo building at 3 stories. But my neighborhood is a hole into plan due to Lakeside and their wishes.

Again, Shoreline has done a great job providing housing, providing jobs, providing wealth. Seattle's plan, particularly in my neighborhood bows to the willow the wealthy -again-just like there is no social housing in Laurelhurst or Madison Park.
I want all of Haller Lake from the line of Meridian to I-5 to be upzoned like Shoreline endnote have the wealthy covertly run the city plan.

I was around her win the Charlie Chong days and remember th eNIMBY-ism and th preciousness of Seattle voters, who cried about their 'neighborhoods' but let thousands of acres of east and south King County go to development with no infrastructure. Thousands of forest and farms were turned into he area's needed housing to protect the 'feel' of the neighborhoods and resist change in Seattle—providing the same sort of short-sightedness still seen in this plan-

As a then-resident in the wilderness around dNorth Bend, on the family farm, I witnessed this ignorance up close ——and here —in light of a similar 'balanced ' to the wealthy and the NIMBY is a similar one——time to grown up Seattle and become a real city —

The truth is. ———It is either density or sprawl

Choose density for the health of the planet---

Jan Jarvis
2325 North 137th St.
Seattle 98133

From: Tim Jaureguy
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 12:17:43 PM

CAUTION: External Email

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

260-1

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Tim Jaureguy
tim.jaureguy@gmail.com
5110 NE 54th St
Seattle, Washington 98105

DEIS StoryMap Comment

Name: Jeannette

Email: jeannette2679@gmail.com

Date: 3/13/2024

Comment:

I strongly support Alternative 5. I live in the station area and am in my 30s. We need more housing for Seattle's future, so people don't have to leave the area and can have families here. There will be impacts, but the impacts of insufficient housing are worse. It feels like what is proposed might not even go far enough. Right now there is not enough housing; if the proposal only meets today's needs then we will still have a problem in the future.

261-1

From: barbara Jeniker
To: PCD_CompPlan_EIS; Strauss, Dan
Subject: Environmental Impact Statement
Date: Friday, May 3, 2024 11:54:51 AM

CAUTION: External Email

Section P3-3 claims NO IMPACT on "plant or animal species in the wild", BUT, what is the impact on plant or animal species IN SEATTLE'S URBAN FOREST?

Section P3-3 claims these plans will not have significant adverse impacts on the tree canopy cover. ****WHO MAKES THIS CLAIM?**** When you remove a tree, it is removd FROM the tree canopy cover; it is subtracted. Removing multiple trees TAKES AWAY from tree canopy cover! How can subtracting not be adverse to the GOAL of attaining 30% cover? Planting saplings does NOT EQUAL mature trees which today make up SEATTLE'S urban forest and tree canopy cover.

262-1

How does planning to attain 30% urban tree canopy cover (by planting new trees/saplings) work without space for them to mature? If mature trees are not left on developed land, where will they be? Rememver, saplings do not equal mature trees.

From: Jerome MD PhD, Keith R
To: PCD_CompPlan_EIS
Subject: Comp plan comment
Date: Monday, May 20, 2024 1:50:33 PM

Just a quick note to encourage you to amend the comp plan to increase housing in Seattle. The younger generation needs the chance to live in our city. Something closer to your previous “housing abundance map” would be a great start.

263-1

Keith Jerome
Seattle

Letter 264

From: C Johnson
To: PCD_CompPlan_EIS
Cc: LEG_CouncilMembers
Subject: Comment on DEIS
Date: Monday, May 6, 2024 4:58:32 PM

CAUTION: External Email

I would like to submit these questions regarding the DEIS:

- Section P 3-3 states that "none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild." What is the impact of the plan specifically on Seattle's plants and animals? 264-1

- Section P 3-3 states that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." What analysis shows that tree planting programs, coupled with increased hardscape, will compensate for lost urban forest?

- The plan states that Seattle will make progress toward its 30% canopy goal. The new tree ordinance substantially reduces private land available for trees. How much public land is available to reach the 30% goal? How many trees will need to be planted in these areas every year to make up for trees removed by development?

Sincerely,

Carla Johnson
Seattle, WA

Letter 265

From: Iskra Johnson
To: PCD_CompPlan_EIS
Subject: comment on One Seattle Plan DEIS
Date: Monday, May 6, 2024 3:52:05 PM

CAUTION: External Email

1. To combat global warming the city of Seattle has committed to a goal of increasing its tree canopy cover to 30% by 2037.
What provisions are in the One Seattle Plan to help reach this goal?

265-1

Iskra Johnson

From: Iskra Johnson
To: PCD_CompPlan_EIS
Subject: Comment on Comprehensive Plan DEIS
Date: Monday, May 6, 2024 4:00:52 PM

CAUTION: External Email

3. According to King County's own 2021 Urban Growth Capacity Report, under recent cumulative up-zones Washington's biggest urban county already has capacity for 400,000 more housing units. This is enough to meet population pressures through 2035 and the following 20-year planning period: additionally, city planners have told citizens at the Comp Plan meetings that there is already sufficient housing capacity for the next 40 years. Why is this data being disregarded in estimates of how much new housing and upzoning is needed moving forward? 266-1

Iskra Johnson

From: Iskra Johnson
To: PCD_CompPlan_EIS
Subject: Comment on Comprehensive Plan EIS
Date: Monday, May 6, 2024 4:00:45 PM

CAUTION: External Email

2. It is important to look at how the One Seattle Plan intersects with the Missing Middle legislation. Under the Missing Middle law formerly single family neighborhoods may have up to 6 units of housing on them. How is the city going to reach its 30% canopy goal with this level of density? 266-2

Iskra Johnson

From: Iskra Johnson
To: PCD_CompPlan_EIS
Subject: Comment on Comprehensive Plan DEIS
Date: Monday, May 6, 2024 4:00:47 PM

CAUTION: External Email

4. The majority of urban trees, 67%, are in residential areas and particularly in areas formerly considered single family. The 2023 tree code allows developers to add impermeable landscape and structures to 85% of a lot, effectively deforesting the lots completely --and even heritage trees are not fully protected. Given the current tree code, what calculations has the EIS done to predict the future of the tree canopy under the One Seattle Plan's additional density?

Iskra Johnson

266-2 cont

From: Iskra Johnson
To: PCD_CompPlan_EIS
Subject: Comment on Comprehensive Plan DEIS
Date: Monday, May 6, 2024 4:00:41 PM

CAUTION: External Email

5. What science and data has the EIS reviewed to assess the effects of the Plan's added density on

a.Stream and watershed health

b.Salmon health

c. Bird and pollinator health

d. Human health from heat islands caused by urban deforestation

Iskra Johnson

266-2 cont

From: Iskra Johnson
To: PCD_CompPlan_EIS
Subject: Comment on Comprehensive Plan DEIS
Date: Monday, May 6, 2024 4:00:35 PM

CAUTION: External Email

7. The EIS has stated that there are no environmental concerns worth assessing with the added density of the One Seattle Plan. What infrastructure capacity studies has the EIS looked at to assess the city's sewer capacity to handle storm overflow in the new climate of extreme rainfall with added density and hardscaping? Has it looked, for reference, at the proven historical damages and enormous expense incurred to repair inadequate drainage in Broadview, and the Central District's Madison Valley, where storm overflow has led to death? (Source https://www.seattletimes.com/seattle-news/anatomy-of-madison-valleys-fatal-december-flood/) Has it considered the flash flooding in Ballard in November 2023 that overwhelmed water systems and flooded the Salty Dog Studios, causing tens of thousands of dollars? Has the EIS taken into account that we now have "100-year floods" annually and that most of our drainage systems were built 50+ years ago, and built for 25-year floods? Has it looked at the science of how large trees hold water in the ground and prevent flooding?

266-3

Iskra Johnson

From: Iskra Johnson
To: PCD_CompPlan_EIS
Subject: Comment on Comprehensive Plan DEIS
Date: Monday, May 6, 2024 4:00:34 PM

CAUTION: External Email

266-4

8.How will the One Seattle Plan mitigate damages from deforestation and the lack of organic drainage formerly provided by larger trees?

Iskra Johnson

From: Iskra Johnson
To: PCD_CompPlan_EIS
Subject: Comment on Comprehensive Plan DEIS
Date: Monday, May 6, 2024 4:00:33 PM

CAUTION: External Email

9. Are the One Seattle Plan's predictions of housing needed and population based on pre-pandemic work and population trends? If so has the DEIS looked at how work from home, climate change and demographic changes may effect population assumptions?

Iskra Johnson

266-4 cont

From: Iskra Johnson
To: PCD_CompPlan_EIS
Subject: Comment on Comprehensive Plan DEIS
Date: Monday, May 6, 2024 4:00:30 PM

CAUTION: External Email

11. One of the chief rationales for adding exponential housing density throughout the formerly single family zones has been “equity.” It is a fundamental value proposition of the One Seattle Plan that low income people should have equal access to the desirable neighborhoods with trees, gardens and historical character, and particularly that people formerly excluded from these neighborhoods under redlining should benefit from added density. Since the added density will remove historical homes, trees and gardens, leading to hard-scaped heat islands and making formerly desirable neighborhoods less environmentally healthy and appealing, in what way will this benefit formerly excluded and low income people?

266-4 cont

Iskra Johnson

From: Iskra Johnson
To: PCD_CompPlan_EIS
Subject: Comment on Comprehensive Plan DEIS
Date: Monday, May 6, 2024 3:58:00 PM

CAUTION: External Email

10. What assessments has the One Seattle Plan done to verify existing housing capacity, and has the DEIS verified these assessments and predictions of future needs?

266-5

Iskra Johnson

From: Iskra Johnson
To: PCD_CompPlan_EIS
Subject: Comment on Comprehensive Plan DEIS
Date: Monday, May 6, 2024 4:02:36 PM

CAUTION: External Email

6. What science and data has the One Seattle Plan DEIS reviewed, given recent estimates of approaching exhaustion of the power grid, to assess whether our power infrastructure can support an additional 100,000 units of housing in the next 20 years? (Sources https://www.pnucc.org/wp-content/uploads/2024-PNUCC-Northwest-Regional-Forecast-final.pdf https://www.seattletimes.com/seattle-news/climate-lab/surge-in-electricity-demand-poses-tricky-path-ahead-for-pnw-utilities-report-shows/)

266-5 cont

Iskra Johnson

From: Iskra Johnson
To: PCD_CompPlan_EIS
Subject: Comment on Comprehensive Plan DEIS
Date: Monday, May 6, 2024 4:00:28 PM

CAUTION: External Email

12. It has been shown after 20 years of explosive growth of housing in Seattle, with 30% of all new housing provided in the last two decades, that new housing is far more expensive than old housing: Housing costs have doubled and tripled. Has the DEIS verified the assumptions that 100,000 new units of housing will trickle down to create greater affordability? If so, how much more affordability will occur? The past 20 years have shown that for-profit developers build luxury housing and expensive apartments, not affordable rentals. What protection is there in the One Seattle Plan to prevent the housing inflation that comes with gentrification?

266-5 cont

Letter 267

From: Andalucia Johnston
To: PCD_CompPlan_EIS; LEG_CouncilMembers
Subject: Urgent Comment on DEIS
Date: Sunday, May 5, 2024 8:00:32 PM

CAUTION: External Email

Please note my comment on the DEIS:

1: Section P 3-3 states that “none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild.” What is the impact of the plan specifically on Seattle’s plants and animals?

267-1

2: Section P 3-3 states that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." What analysis shows that tree planting programs, coupled with increased hardscape, will compensate for lost urban forest?

3: The plan states that Seattle will make progress toward its 30% canopy goal. The new tree ordinance substantially reduces private land available for trees. How much public land is available to reach the 30% goal? How many trees will need to be planted in these areas every year to make up for trees removed by development?

Sincerely,

Luci Johnston

Letter 268

From: Judi Jones
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 10:44:53 AM

CAUTION: External Email

Comments Planning and Community Development EIS,

For Seattle to remain a desirable city we need to maintain our livability which means open space and trees!

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS). 268-1

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Judi Jones
jjinseattle@me.com
4616 25th Ave NE #484
Seattle, Washington 98105

Letter 269

From: Mary Jones
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 8:29:40 AM

CAUTION: External Email

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

269-1

Mitigation recommendations:

* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Mary Jones
206mej@gmail.com
2600 Fairview Ave East, Slip #5
Seattle, Washington 98102

From: Wendy Joseph
To: PCD_CompPlan_EIS
Cc: Moore, Cathy; Woo, Tanya; Nelson, Sara
Subject: Trees Save Lives
Date: Thursday, May 2, 2024 9:41:58 PM

CAUTION: External Email

To the comprehensive planners and my District 5 Representatives:

I have serious questions about Seattle's Comprehensive Plan for growth. Trees have to come first and trees do not appear to have much importance in this plan.

Section P 3-3 states that “none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild.” What should we expect if this is not true? What are the specific details? **This statement is too vague.**

270-1

Section P 3-3 also states that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." Again, what are the details of these "adverse impacts"? How do you **guarantee survival of the tree canopy?**

The plan states that Seattle will make progress toward its 30% canopy goal. The new tree ordinance substantially reduces private land available for trees. How much land do we need for this 30% goal? How much will be slated for "development" (i.e., pricey apartments and condos with nothing reserved for low income people) and how much for trees? Where in the city will these trees be planted? And how many trees exactly do we need to reach the 30% goal?

Jimi Hendrix Park has pitifully few trees, and was passed by the last time the city planted trees in public places. It covers a large area, 2.3 acres, and **trees could be planted in abundance there**, trees that have a proven value in raising the quality of life with healthier air, and the proven psychological lift that green spaces provide, ergo less crime. We could certainly use that in Seattle. The park is in a low income, mostly minority neighborhood. **Just why is it that Jimi Hendrix Park, named in honor of one of Seattle's greatest musicians and hands down the greatest rock guitarist of all time, gets treated so shamefully? Don't Black Lives Matter there?**

SAVE THE PLANET.
PLANT A TREE.
SAVE THE PLANET FASTER.
PLANT MORE TREES.

--
Fair winds,
Wendy

Wendy Joseph
10345 Meridian Ave. N. #703
Seattle, WA 98133
wjoseph924@gmail.com
(206) 819-9924 cell

Letter 271

From: R K
To: PCD_CompPlan_EIS
Subject: Seattle Comprehensive Plan (/ Environmental Impact Statement).
Date: Sunday, May 5, 2024 10:20:47 PM

CAUTION: External Email

Seattle Comprehensive Plan (/ Environmental Impact Statement).

Some input... thank you for the consideration.

-- -- -- -- --

>> The DEIS Executive Summary states an intent to "Increase the supply of housing to ease increasing housing prices caused by limited supply."
Provide evidence for and against the claim that this supply-side trickle-down theory has worked for housing... and state whether the evidence is scarce or abundant.
Provide evidence for and against the claim that this supply-side trickle-down theory has worked to reduce housing costs for low-income households during the recent 10 years of extreme increase in rental housing in Seattle... and state whether the evidence is scarce or abundant.
What specific change has been drafted to address this input?

271-1

>> Include definitions of "affordability" that are good (proven to be clear by public survey), and make them easily found.
What specific change has been drafted to address this input?

>> Require that all development be required to build sidewalks, or pay into a sidewalk fund if a sidewalk is already present.
(NOTE: The city has demonstrated over the years that sidewalks will not be built in significant numbers by city dollars if significant changes in policy are not enacted).
What specific change has been drafted to address this input?

>> Prioritize that development (with sidewalks) occur where sidewalks are lacking... and DE-prioritize development where sidewalks already exist... to...
1) Get sidewalks.
2) Get enough sidewalks to make a difference (hence the "DE-prioritize elsewhere").
3) Reduce the damage to older existing sidewalks which has been occurring near development.
(NOTE: The city has sufficiently demonstrated over the years that sidewalks will not be built in significant numbers by city dollars if significant changes in policy are not enacted).
What specific change has been drafted to address this input?

>> Provide no giveaways to developers that are not combined with impact fees or other commensurate public benefit compensation.
(NOTE: Once developers are given something, it can't be taken away or balanced (they will sue, successfully), therefore, the give and take need to be connected... not giveaways first).
What specific change has been drafted to address this input?

>> According to current code, when the zoning of a parcel changes, it can also impact the rules for neighboring parcels.
For example: changing a parcel from single family zoning to "Low Rise" may loosen the (for example) setback requirements on a neighboring parcel zoned Commercial.
Do not give away such benefits to the investors in those NC Commercial zone properties without simultaneously implementing impact fees or other commensurate public benefit compensation.
REF: Commercial Setback Requirements (23.47A.014): (https://library.municode.com/wa/seattle/codes/municipal_code?nodeId=TIT23LAUSCO_SUBTITLE_IIILAUSRE_CH23.47ACO_23.47A.014SERE).
What specific change has been drafted to address this input?

>> Up-zones without commensurate public benefit compensation are immoral.
Such up-zoning now cheats current and future generations of the asset of being able to apply those up-zones under better circumstances... when fairness can be applied (up-zones which create private benefit in exchange for public benefit)... or when there is greater need to stimulate the economy and create employment in construction and government (during periods of high unemployment).
Such up-zoning now is short-sighted and a short term money grab... when long term needs are not predictable except that it is nearly certain that things will not stay on a steady course, but rather that there will be cycles (periods of rising and falling employment).
What specific change has been drafted to address this input?

>> Blanket up-zones without commensurate public benefit compensation are particularly immoral as they cheat current and future generations of being able to target up-zones for maximum result (highest public benefit and lowest public harm).
What specific change has been drafted to address this input?

271-1 cont

>> Do not up-zone the residential blocks between 85th and 80th near Greenwood Ave.
...
"Updating Seattle's Neighborhood Residential Zones" page 4 says:
"In these new and expanded centers (see map), areas currently zoned Neighborhood Residential would be changed to other zones (like Lowrise Multifamily) where development of larger buildings could occur."
This may mean a change to: Lowrise Multifamily (LR1, LR2, LR3):
(https://www.seattle.gov/Documents/Departments/SDCI/Codes/MultifamilyZoningSummary.pdf).
...
Just as "one-size-fits-all" is false, it is also false that "one-shape-fits-all". Looking at the actual situation in Greenwood rather than plopping standard shapes on a map leads to a better conclusion... that the Greenwood Urban Village should not be changed to up-zone residential blocks between 85th and 80th.
...
This location is not near "major transit" (which WA state has defined as a stop which serves light rail, express buses and HOV lanes), and lacks even minor direct transit to the largest centers north of the canal.
...
The up-zoning may or may not change the value of the property, but would change who it is of value to... from those seeking a place to live... to those seeking a place to hold as an investment until multiple contiguous properties are available for teardown and redevelopment.
...
The effect will be that the properties will experience a future of decay as the incentive to maintain the structures is lost because of the expectation of future tear-down.
...
In effect this rezoning is a rezoning to "AREA OF FUTURE DECAY" (a dedicated decay zone).
...
In areas that have already experienced significant decay, the housing may have reached a natural affordability.
In such cases this rezoning can hasten the tearing down affordable housing and the replacing of it with housing which is not affordable, on a false theory that it will increase affordability.
...
This plan is using quality decay, and quality of life decay, to achieve greater profitability for investors, and to increase employment during a time of already low unemployment.
...
Do not up-zone the residential blocks between 85th and 80th near Greenwood Ave.
What specific change has been drafted to address this input?

271-2

-- -- -- -- --

DEIS StoryMap Comment

Name: Jack Kaldowski

Email: evita.kaldowski@icloud.com

Date: 4/6/2024

Comment:

I am a renter in U District, and I believe that the City of Seattle did not listen to the overwhelming majority's call for an Alternative 6 vision, which would encourage social housing in all neighborhoods. Instead the current draft plan will increase inequality and homelessness. To create a more equitable, affordable city, the plan should add many more 'Neighborhood Centers', especially in Urban Neighborhoods.

272-1

If the City of Seattle adopted my above proposed changes, then we would be able to enhance housing security for renters and low-income folks.

From: Dan Keefe
To: PCD_CompPlan_EIS
Subject: Comp Plan Shortcomings
Date: Sunday, May 5, 2024 10:16:15 PM

CAUTION: External Email

1. The Comp Plan poorly documents that plants and animals will not be affected by planned building scenarios.

2. Preservation and enhancement our urban forest lands and parks must be a high priority. Many people cannot get out of town into the national forests because there is no transportation.

273-1

3. It's absurd to state that new tree plantings will compensate for those removed for development. It takes years for new trees to equal the sequestering ability of mature trees.

Respectfully submitted,
Dan Keefe
Meadowbrook

Letter 274

From: Sophia Keller
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 8:29:15 AM

CAUTION: External Email

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

274-1

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Sophia Keller
keltiawind@gmail.com
851 SW 127th Street
Seattle, Washington 98146

From: Kathryn Keller
To: PCD_CompPlan_EIS
Subject: A few comments on the One Seattle DEIS and Plainng for climate and people resilience in future
Date: Monday, May 6, 2024 4:50:42 PM
Attachments: Snoho Transportation Concurrency Approach.png

CAUTION: External Email

Hi:

I've been following the process for some time (and involved historically in a number of these efforts). I think that once we got HB1110, along with the Seattle and WA ADU bills, Seattle could potentially get some level of growth everywhere. So, Earth and Climate, displacement pressures, and city infrastructure impacts become really important to mitigate or avoid, given Seattle's development way ahead of where most of the rest of the state is at. We do not exist in a vacuum. Nor does any one get to say, or should get to say 'I will live out in the country' and have nothing to do with the local economy of that place by virtue of job in framing or open space management. So, I do not believe Seattle takes on ALL growth issues for the state.

I don't see any place based discussion other than for the new light rail station area in the EIS, so I expect area based planning, out of which any rezones (and changes to the code itself) should come. We should actually have the whole city planned like Portland has, maintained plans. So they can be adjusted over time. It isn't about the 'type' of zoning, it is about the place and the whole mix of history, people, and many types of zoning. Why should the city care if it isn't facilitated by good transportation, diverse uses and architecture and diversity of residents? The people who get pushed out cared but they are gone now. Their children now care about harms done in the name of planning, though. We all care when the land slides, too. Or we get flooded. I realize no one can fix anything, but let's stop lose lose propositions.

We require transparency about exactly what the impacts are, no mitigation possible is NOT an answer. No mitigation needed — we need the evidence, the money is on the table. You will need to fight for mitigation is not the answer, either. The means, programs and laws that ensure we are safe and secure in our homes, and communities are resilient, needs to be materially assured before government allows more construction in an area. Focus on what to develop and who to develop for is also critical when publicly subsidies are needed for pretty much everyone's home if they are under AMI. Access to services and transportation infrastructure is more important, as well as, and all that makes a complete neighborhood. People living in a place need to shape that, because de facto eminent domain is more what has happened. Anti-displacement measures need to be in place before up zone actions. And legacy and outcomes of prior action needs to be assessed. 275-1

I argue that we consider a much better process for the implementation land use actions for the comprehensive plan that can take into account the recently passed Transportation Plan, more aggressive anti-displacement measures, hashing out preservation of some more land for trees, our sidewalks, etc. Including hyper local assessment in EIS's.

With Neighborhood Residential work, I also think certain facts of history and how they played out need to be readdressed. Because the city is doing generic zone-based zoning, all incredibly 'flexible' (NEVER any form based), which carries a ton of false assumptions. Presumption has been the name of the game. Never actually talk to homeowners who have the land under them changed by the government.

Much of low rise in the Central Area was a recognition of an area that was not mostly developed with nice platted subdivisions. And, I am sure there are other areas that are not nice neat suburban style platted. But, the city went on a mission to conform all to some suburban style scheme and make it grow more, and in my area 'accommodated' some flexibility. This needs a serious unwiring of history. From the last 60 years or so.

Accommodating low rise when it was actually just a few units on a lot, meant that those families did triplex their properties, and a few properties were redeveloped, which did have some anti-displacement effect prior to 2000. The sell off by SHA had an impact. There are cottage condo communities nearly 50 years old, too. Dirty little secret, once multiple owners on a lot it's pretty much done for redevelopment potential unless, someone buys up to the point or owners flip to investment property to the point, when it is no longer 50% owner occupied residential under terms where feds will lend for home purchase. This is a vulnerability that all the rewrite of state 'HOA" laws which still apply to all the townhomes zero-lot whether they require an HOA or not, is missed. And, there are two story apartment buildings. But, the 'highest and best use' did not reach a thresh hold making it impossible for someone to develop their own property for housing family or renting out units until after 2000. At least in my area of outside the Urban Village but still low rise.

Even with the Urban Village scheme, there were low rise outside the Urban Village and Single Family inside the Urban Village because the city wanted to draw lines on the map to scope the planning work, again ignoring that planning is not about bigger buildings, but community development , and this in a community struggling to prevent displacement. Where one presumes the community there, the PEOPLE THERE, should benefit from what building happens. Others just see empty land to exploit.

In the 21st Century, the city classified all zones not Single Family/single owner/single house as Multi-family (which everyone thinks apartment buildings), with development regulations to promote redevelopment and displacement. The zoning toolbox is weak, too weak, when it comes to options for form and fit with the real economy and economic conditions of the people. The multi-family track became an exercise on paper to add units and square footage, then apply everywhere without regards to real differences in different places. Ignoring the fact that government has accountabilities rezoning the land under peoples' homes. It is as if someone changed the covenants without having you sign anything to agree the way the city will not communicate real consequences by USPS. On land you own?

I think the biggest new reality is that we really have multiple housing units on a lot anywhere in the urbanized areas of the state. The intent of low rise, at least what was LDT and L-1, and smaller apartment buildings L-2, seems to be really the same as higher densities of what is allowed under HB1110, and projected for our new Neighborhood Residential, so I'd hope we can align this better. In hindsight, MHA seems unfair to those pulled into that regime by virtue of having been low rise, or single family inside Urban Village, just before the city allows three units for sale everywhere, and the state unwire 'pure' single family development. At least in some areas, there is no potential for redevelopment really. It's already new townhouses or old families who survived. Redevelopment will happen, but it will be more rare than tearing down whole blocks.

We will need to look carefully at the steep slope and liquefaction areas before encouraging more building. Or, how would development improve or stabilize the earth? The hillsides over that Madison Valley neighborhood on the map are still being studied with water issues continuing. Believe me, people living on that land are concerned, and every development seemed to include some mudslide activity.

We do not know if the Transportation levy will pass, and even if it does, we need to know the budget is there to support whatever level of development is proposed for each area to be re zoned.

For all those reasons, I think there is a lot more reality check that everyone needs to understand, more deep look at place based interconnections of all concurrency factors and equitable income distribution. Not from 'above' on a map with spreadsheets. On the ground with the people who are residents and plot owner residents in the places.

As far as this Draft EIS, and the realities of generic/theoretical/ideological planning:

DEIS 3.1 Earth and Water This section needs to have more information about the specific land slide prone areas and water and flood threats with the building we have already in those places. 275-2

DEIS 3.6 Land Use This section should reflect better dependency on anti-displacement measures which may need to be beyond that which housing subsidies try to deliver for. It does not belong only in the housing section, because all homeowners and residents (home owners who have long tenure living on their land are residents) are impacted positively or negatively, by up zoning. Some see the disinvestment in their commercial areas when no one wants to build what is planned for. Local businesses being pushed out is also a huge problem. The poor and middle class are pushed out which subsidies try (without enough) to mitigate. The wealthy don't want poor people in their neighborhoods? Too bad. That ship has sailed, but we need to ensure sidewalks and transit assets to those areas when there is growth planned for. We might need to take place based planning more iteratively, in conjunction with when we actually are doing infrastructure improvements in an area or plan large public investment because we are talking about adding onto what already is. Infill is not empty land, but in some ways, we need to handle the processes by which land becomes 'empty'. A little bit of forensics about property transfers would uncovered a lot of dirty dealing by land flippers, supported by a system that views land as empty if under built to zoning they did not agree to when they bought, and which is now lived on and well loved. 275-3

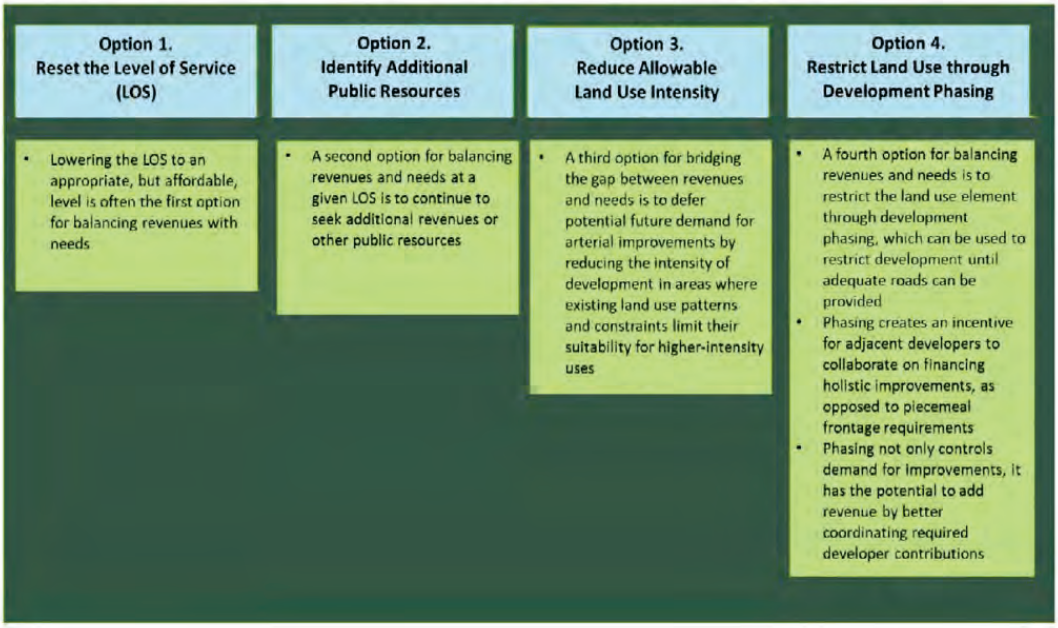
Backyard cottages under MFTE would help us. As would a lot more Habitat type housing. Privilege those, and long time homeowners rehabbing for additional units, in the permitting process. I think enabling more people to house more people where they live is slower, and not as visible, but more resilient and community stability focused.

Finally: Saving trees elsewhere or any other grand scheme is not a reason for Seattle to take action that contradicts the basic concurrency factors we have decided matter for a healthy life. GMA envisions a system of complete towns and cities. It is framed with growth boundaries, ending suburban subdivisions and strip malls, and highway capacity replaced with rail that will stop creeping urbanization. The economic growth in the city of Seattle is connected by people who move around the region. Yet, within and outside of the city there are urban areas that are underdeveloped, and have mass transit options. This requires investment in community and housing for all incomes in all 'places' which is different from 'everywhere' or covering the earth with building and human enterprise. We have well formed and defined places that operate as a system. Not just Seattle. 275-4

Thank you,
Kathryn Keller

I offer a perspective, expressed in the Snohomish County plan, in their Transportation section. It makes transparent the very real choices we have, might have, and might not have.

Figure TE-8 Reassessment Strategy Options for Balancing LOS, Land Use, and Revenues



275-1 cont

Letter 276

From: Peter Kelly
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 8:48:14 AM

CAUTION: External Email

Comments Planning and Community Development EIS,

Trees and housing are not incompatible. We need to preserve our existing mature trees and support the planting and growth of more trees. That will make our neighborhoods more healthy and livable.

I have comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS):
* It does nothing to address keeping safe the existing larger trees when properties are developed.
* It provides no research or analysis of the impact of the tree loss that we are currently experiencing and will continue to experience without better protections. It dismisses new solutions without proof.
*There is no time frame for any restoration or replacement for lost trees.

276-1

Mitigation recommendations:

* Allow the city to require alternative site designs and larger setbacks for street trees.
* Require Tree Inventories and Landscape Plans be done before any tree removal and any building permits are issued.
* Provide dedicated tree planting and retention areas like Portland does and Tacoma has proposed.
* Amend the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.
*Make stiffer penalties for any tree removal done in violation of the Tree Protection Ordinance. Trees are often removed despite plans approved that show the trees retained.

Thank you for your consideration.

Peter Kelly
12pixelpete@comcast.net
10623 Exeter Ave NE
Seattle, Washington 98125

From: shana kelly
To: PCD_CompPlan_EIS
Cc: LEG_CouncilMembers; Strauss, Dan; Moore, Cathy; Harrell, Bruce
Subject: Environmental impact on our urban canopy
Date: Monday, May 6, 2024 12:35:39 AM

CAUTION: External Email

Out of the five alternatives in the plan, alternatives 2 and 4 would save the most trees and still allow for 100,000 new homes.

In Section P 3-3 states, "none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recover of plant or animal species in the wild."

277-1

What are the expected impacts of the One Seattle Plan on Seattle's plants and animals?

Section P 3-3 states that “none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild.”

What is the impact of the plan specifically on Seattle’s plants and animals? We have already experienced significant bird, insect, and plant decreases over the past few years. I don't see how removing more trees and allowing unsustainable increases in density, pavement, and shorelines won't impact the flora and fauna.

Will there be long term monitoring of impacts?

Section P 3-3 states that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover."

I would like to know what analysis or data shows that tree planting programs, coupled with increased hardscape, will compensate for lost urban forest?

The plan states that Seattle will make progress toward its 30% canopy goal. The new tree ordinance substantially reduces private land available for trees and the current system of fining developers is not effective.

What is the environmental impact of continuing to lose 1.7 of our tree canopy every five years, when 70% of our tree canopy and most of the loss is in formerly single-family neighborhoods?

Where does the city acknowledge that planting new trees takes 20-30 years to provide a tree canopy, to shade houses, or combat heat islands?

Doesn't it seem more practical to offer incentives to build around established trees?

How much public land is available to reach the 30% goal?

How many trees will need to be planted in these areas every year to make up for trees removed by development AND what responsibility will the city take for ensuring the life and

growth of newly planted trees, when new owners are unable/unwilling?

Thank you for your support of Seattle's irreplaceable urban forest.

277-1
cont

Shana Kelly, M.S., CCC-SLP

Pediatric Speech Language Pathologist
Children's Communication Corner, Inc.
www.communicationcorner.org

From: Kathleen Kerkof
To: PCD_OneSeattleCompPlan; PCD_CompPlan_EIS
Cc: Woo, Tanya; Kettle, Robert; Nelson, Sara; Strauss, Dan
Subject: One Seattle Comprehensive Draft Plan
Date: Monday, May 6, 2024 4:56:05 PM

CAUTION: External Email

Dear Staff members and Coun members

I am writing to state my preference for Urban Planning Alternative 2 and 4 as they would protect the most trees. Some of the draft's sections such as the one on Climate and the Environment talk about and recognize the benefits of green spaces and trees. However, preserving and expanding our tree canopy and green spaces will not happen without concrete efforts. With that in mind, I have concerns and questions about statements in the Environmental Impact Statement.

278-1

1. Section P 3-3 states that “none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild.” **What is the impact of the plan specifically on Seattle’s plants and animals? This statement implies that nature is "out there" and separate from people living in the city. Connection to nature is vital to our physical and psychological health and to imply that the only thing that matters as far as environmental impact is whether the plant or animal goes extinct gives lie to the goals and statements in the Comprehensive Plan.**

2. Section P 3-3 states that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." **What analysis shows that tree planting programs, coupled with increased hardscape, will compensate for lost urban forest? Keep in mind that when we cut down old large trees which keep growing and putting on more canopy each year, we are destroying valuable green infrastructure. Any tree that is planted will take many years to take return us to what we had. Do we have that time given the accelerating effects of climate change? Are we leaving enough space for trees to be able to survive?**

3. The plan states that Seattle will make progress toward its 30% canopy goal. The new tree ordinance substantially reduces private land available for trees. **How much public land is available to reach the 30% goal? How many trees will need to be planted in these areas every year to make up for trees removed by development? What budget has been established to reach our 30% goal?**

Sincerely,
Kathleen Kerkof
2235 NW 64th St
Seattle, WA 98107

Letter 279

From: Paulette Kidder
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 5:48:46 AM

CAUTION: External Email

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

279-1

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Paulette Kidder
pwkidder@seattleu.edu
2122 N 88th Street
Seattle , Washington 98103

Letter 280

From: Janet Kimball
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 3:22:40 PM

CAUTION: External Email

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

280-1

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
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* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Janet Kimball
hughandjanetkimball@yahoo.com
8051 28th Avenue NE
Seattle, Washington 98115

From: Vicki King
To: PCD_CompPlan_EIS
Subject: Comp Plan comments
Date: Sunday, May 5, 2024 6:24:43 PM

CAUTION: External Email

Alternatives 2 and 4 are less harmful than 3 and 5.

What an appalling set of alternatives for those of us who worry about the impact on Seattle's short- term and long-range liveability as climate change continues to impact our city, state and region.

Existing big trees can help mitigate the changes coming. Cutting these big trees down -- not to mention not requiring that many more be planted in the very areas that will be developed -- to be able to stuff ever more housing into already developed areas with no shade is short-sighted and will just make life miserable for the new inhabitants. 281-1

Letting developers cut down big trees only to plant small trees elsewhere will not improve the liveabiity of the new housing.

Victoria King
7326 55th Ave NE
Seattle

Letter 282

From: Susan Kirchoff
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Wednesday, May 8, 2024 1:01:20 PM

CAUTION: External Email

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

282-1

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
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* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Susan Kirchoff
kirchoffsusan5@gmail.com
3237 29th Ave W
Seattle, Washington 98199

Letter 283

From: Tracey Kirk
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 6:30:16 PM

CAUTION: External Email

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

283-1

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
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* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.
Sincerely,
Tracey Kirk
Seattle,WA

Tracey Kirk
traceylskirk@gmail.com
6801 43rd Ave Ne
Seattle, Washington 98115

From: Bryan Kirschner
To: PCD_CompPlan_EIS
Subject: Public Comment on the One Seattle Draft EIS
Date: Monday, May 6, 2024 6:30:59 AM

CAUTION: External Email

This is public comment on the Draft One Seattle Environmental Impact Statement (DEIS).

1: The City has documented that people of color (POC) in Seattle are more likely to live within 200 meters of major freight routes, adjacent to busy arterials, and near sources of industrial pollution as a result of land use planning decisions regarding the location of multifamily housing. The Final EIS will limit the scope of change possible in the One Seattle Comprehensive Plan (Comp Plan) update The Final EIS should therefore include a plan encompassing the number, kind, and location of homes sufficient to remedy this racial inequity based on where people live during the effective period of the One Seattle Comprehensive Plan Update. This would be consistent with the City's Federal obligation to Affirmatively Further Fair Housing and Council Resolution 31164 which states "The Race and Social Justice Initiative envisions a city where racial and social disparities have been eliminated and equity and inclusiveness achieved…City departments should use available tools to work to eliminate racial and social disparities across key indicators of success, including health…". 284-1

1a: Did the City consider an analysis of a plan encompassing the number, kind, and location of homes sufficient to remedy racial inequity based on where people live based on its obligation to Affirmatively Further Fair Housing? If so, why was such an analysis rejected? If such an analysis was conducted, why was it not included in the DEIS?

1b: Did the City consider an analysis of a plan encompassing the number, kind, and location of homes sufficient to remedy racial inequity based on where people live based on Council Resolution 31164? If so, why was such an analysis rejected? If such an analysis was conducted, why was it not included in the DEIS?

1c: Did the City consider an EIS analysis of a plan encompassing the number, kind, and location of homes sufficient to remedy racial inequity based on the Comp Plan update objectives of "Equity"--"Equity: Provide equitable access to housing, jobs and economic opportunities, services, recreation, transportation, and other investments. Center the work with an intersectional, race-conscious lens, informed by a history of racial discrimination and disinvestment"--and "Inclusivity"--"Increase diversity of housing options in neighborhoods throughout Seattle to address exclusivity and so more people can live and stay in a variety of neighborhoods." If so, why was such an analysis rejected? If such an analysis was conducted, why was it not included in the DEIS?

2: The City has documented that POC in Seattle are more likely to live within 200 meters of major freight routes, adjacent to busy arterials, and near sources of industrial pollution as a result of land use planning decisions regarding the location of multifamily housing. The DEIS states that "Equity" and "Inclusivity" are objectives of the Comp Plan update. What are the detailed forecasts for the number and percentage of POC living in and not in those areas over the effective period of the Comp Plan update for each alternative presented?

3: The City has documented that POC in Seattle are more likely to live within 200 meters of major freight routes, adjacent to busy arterials, and near sources of industrial pollution as a result of land use planning decisions regarding the location of multifamily housing. The majority of residential land in the city that is not within 200 meters of major freight routes, adjacent to busy arterials, and near sources of industrial pollution is zoned "Neighborhood Residential." The DEIS includes the possibility of "Implementing MHA requirements in Neighborhood Residential zones" as a mitigation measure related to "Population, Housing, & Employment." MHA entails charging a fee for the construction of multifamily housing that is not applied to the construction of single family housing. This should be stricken from the EIS because it runs counter to the Comp Plan update's objectives of Equity and Inclusivity, the City's obligation to Affirmatively Further Fair Housing, and Council Resolution 31164 because it would reduce the economic competitiveness and viability of constructing multifamily housing more affordable to POC in those areas relative to single family housing.

284-1 cont

4: The DEIS states "The gradual conversion from low-intensity to higher-intensity development patterns is an expected characteristic of urban areas." The DEIS also states as a potential impact on "Land Use and Urban Form" "Increased frequency of areas with mixing of uses and heights. Awkward transitions may temporarily result in older, less intense development next to newer, more-intense ones during Redevelopment. Additional height and bulk changing views, casting longer shadows, and displacing trees." The DEIS presents as a potential mitigation measure "Implementing gradual transitions in zoning." Frankly these statements constitute something of an inscrutable mess and should be clarified and disambiguated in the EIS. To the extent any such considerations have played or will play a role in EIS analysis and proposals, they must be quantified, made clear to the public, and empirically based on pre-existing conditions as follows:

4a: First, since urban areas such as "Paris" and "Barcelona" exist and are popular, what "the expected nature" of a "gradual conversion from low-intensity to higher-intensity development patterns" in urban areas relative to looking backwards at Seattle of the past versus a Seattle of the future is ambiguous. If this assertion is retained, what constitutes "gradual," "low intensity," and "high intensity" should be explicitly defined, along with options for the nature of "transitions." Any impacts from choosing "gradual transitions" for the sake of "expectations" should be declared and quantified relative to the Comp Plan update's goals of "Equity" and "Inclusivity," including residential patterns in which POC disproportionately live within 200 meters of major freight routes, adjacent to busy arterials, and near sources of industrial pollution as a result of land use planning decisions regarding the location of multifamily housing.

4b: "Intensity" should be broken down into constituent elements that are clearly defined. Massing and height, for example, are distinct from "type of use" (such as commercial). The need for "transitions" should be reduced or eliminated based on real-world conditions rather than general expectations. For example: Seattle's "First Residential" districts allowed churches. Thus in Northwest Wallingford, for example, St. Ben's church, a big structure with a multistory bell tower is next door to single family houses. There was no need for a "gradual" transition and larger structures than single family houses have (empirically) happily coexisted for a long time. Likewise, the Walling-Five apartments are the same height as a single family house next door to them, and the Mari-Don apartments are shorter than a three-story single family house. Planning should take into consideration what has empirically actually worked in practice rather than some conceptual and set

of expectations.

4c: Residential density–units per lot–should be stricken from consideration in terms of "transition" outside of health and safety requirements in building code because it would have segregative effects by race and class. There is a large single family house on our block, for example, that could be four two bedroom stacked flats or six to eight one bedroom apartments within the same massing, for example–the latter being more affordable options) Likewise, within the massing of typical four-three-story townhome developments the homes could be one studio per floor. A corner commercial building on Meridian Avenue in Tangletown is shorter than the single family house next door. An older relative who grew up in Ballard described corner stores as "everywhere" in his youth. Slightly more intensive–e.g., corner commercial–within the same massing also does not require "transitions."

4d: The statement "Additional height and bulk changing views, casting longer shadows, and displacing trees" is internally contradictory. Trees cast shadows and block views, and the trees that benefit the city most are as tall or taller than allowable heights on most of the city's residential land. This statement implies removing big trees could be a good thing relative to shadows and views. The EIS and the Comp Plan should clearly state that the highest priorities are more and more affordable homes and trees, not changes in views or patterns of shadow. Consider awarding height bonuses for preserving or planting larger rather than smaller trees.

5: The 2017 City of Seattle and Seattle Housing Authority Joint Assessment of Fair Housing states "Within a 200-meter radius of T-1 and T-2 roadways… the noise and air pollution impacts are most acute…" Recent research has indicated that "Residential proximity to busy roads, defined as >10 000 vehicles per day, was selected as a marker of long-term exposure to near-road traffic-related pollution" and "Air pollution is hyperlocal …research shows it can vary up to 800% from one end of a block to the other" (See: 2017 City of Seattle and Seattle Housing Authority Joint Assessment of Fair Housing, Chronic burden of near-roadway traffic pollution in 10 European cities (APHEKOM network), Air disparities in the Bay Area: Hyperlocal data insights to support climate action). The EIS should evaluate Equity and disproportionate exposure of POC to pollution by analyzing each alternative in view of the number, kind, and affordability of homes that are neither within 200 meters of a T-1 or T-2 roadway, nor on a street carrying 10,000 or more vehicles per day, nor on the block face of a busy street. The EIS should include an option for the number, kind, and affordability of homes that would equalize living in or not in those locations by race. Bryan Kirschner Seattle

284-1 cont

Letter 285

From: Timothy Kitchen
To: PCD_CompPlan_EIS
Subject: Support Original Abundance Map, Seattle Comprehensive Plan
Date: Monday, May 20, 2024 4:20:37 PM

CAUTION: External Email

Hi Seattle Comprehensive Plan planning,

I support the original abundance map being advocated by Complete Communities Coalition. I support an alternative 6 that provides ability to build 10,000+ units a year, has the original 44+ Neighborhood Centers included in OPCD's 2023 Fall draft, allows more businesses beyond corner stores, etc.

285-1

I've been renting for 10 years, and I know that less supply of housing will mean increased cost, potentially pricing me out of my home and making the possibility of actually buying a home much less likely.

I've was born in Western Washington and have lived and rented in Seattle for 15 years, attending UW Seattle for 5 years, volunteering at Roots Youth Homeless shelter, organizing in person meetups for 7 years as organizer of Seattle Hacker News Meetup, serving as board member on my Fremont Neighborhood Council, playing several seasons on pinball teams in Seattle. I am an engaged and contributing member of our Seattle community.

I live and I work in Seattle. I buy and sell products for a living and use public transit to purchase from thrift stores in Seattle. Less density and housing in Seattle will put more cars and traffic on the road, making my job take longer, as thrift stores exist throughout seattle.

My sister and her husband were priced out of Seattle, as they both lived and worked here. For housing cost reasons when they got married they moved north to Edmonds, and again for housing cost reasons when they had kids they moved further north to Everett. They both still work in Seattle, with my sister works as a nurse and nurse manager that delivers babies at a Seattle hospital. But now they have to commute an hour plus everyday to get to work. This costs them time and money, and keeps them away from their family longer every work day.

Having to drive an hour extra each workday is also dramatically more dangerous, than well, not having to do that.

We do not consider enough in our housing policy the consequence of forcing people to have to live far from the job hub of Seattle. The more people have to drive, the higher the chances of literally dying in a car accident. Do we not have a Vision Zero traffic death goal? And how is that fair? Do the people that work here not deserve to live here, and the added transit safety of living here?

Does my sister who literally helps deliver new life into this world as a Seattle nurse, does shere and her family deserve to live here?

Best,
Timothy Kitchen :)

DEIS StoryMap Comment

Name: Dylan Klein

Email: kaylan406@icloud.com

Date: 5/1/2024

Comment:

The city should study the impacts of "corner stores" allowed mid-block as well as on corners. Of the available alternatives, I strongly prefer Alternative 5 with higher growth targets.

286-1

From: suzanne knoblet
To: PCD_CompPlan_EIS
Subject: Light rail etc
Date: Tuesday, March 12, 2024 11:39:10 AM

CAUTION: External Email

Please consider all the critters you displace and make homeless by cutting down trees, green belt areas. My yard is now full of animals due to loss of habitat along i5 and now look for cover as well as any food that might be available. I've more squirrels, raccoons, birds of all types and 5 homeless cats in the last few years all living rough under buildings since no green belt for them. The plantings will take years to grow to shelter them. How about larger taller etc plantings to help where we can have critters move back to our urban green belts.

287-1

From: Cheryl Kordick
To: Moore, Cathy; PCD_CompPlan_EIS; LEG_CouncilMembers
Subject: About The DEIS and the Comprehensive Plan
Date: Sunday, May 5, 2024 11:42:55 AM

CAUTION: External Email

I have serious concerns regarding the continued destruction of Seattle's canopy and building plans based on what I'm seeing in current city council actions.

Regarding the Draft Environmental Impact Statement :

1: Section P 3-3 states that “none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild.” What is the impact of the plan specifically on Seattle’s plants and animals?

288-1

2: Section P 3-3 states that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." What analysis shows that tree planting programs, coupled with increased hardscape, will compensate for lost urban forest? This assumption looks like a fantasy.

3: The plan states that Seattle will make progress toward its 30% canopy goal. The new tree ordinance substantially reduces private land available for trees. How much public land is available to reach the 30% goal? How many trees will need to be planted in these areas every year to make up for trees removed by development?

And about the Comprehensive Plan specifically as it impacts District 5:

The massive "neighborhood center" project planned for Roosevelt Ave NE and NE 90th in Maple Leaf is laughably named. It will destroy a large section of an established neighborhood, including existing homes and change the character of an established community.

288-2

I live next to a plot that had a small affordable home torn down to make room for 3 massive, ugly, high-priced housing units. (Despite being 3 units on a small lot, they will sell for well beyond a barista's salary. There is no way this is low cost housing.) This will not only disrupt the quality of the block in the future, but has proven to be a violation of our privacy and property rights all during the construction. 827 NE 98th St is a construction project where the workers have repeatedly walked over our property and tossed their food litter all over our yard from the beginning. Workers have also most often not worn safety equipment and broken other rules that appear to have no consequences when reported. They also ripped down an exceptional tree on the north side of the lot. The spot where the tree was still has nothing built on it, so I don't know why they had to do this. We managed to stop them from taking down two more exceptional trees on the east and west sides of the property, but they have repeatedly removed the "permanent" fencing that is supposed to protect those trees during construction. Currently, they have a table saw and a huge pile of lumber within the "protected area" of one tree. Again, the city does nothing about any of this. I have no doubt that any Comprehensive Plan/neighborhood center construction will be carried out with the same disregard for rules and promises as what I am seeing going on right next to me today.

Beyond all that, why destroy a lovely bit of neighborhood when there are under-utilized stretches of parking lot and office buildings much closer to the Northgate Transit Center? I walk past the area of NE 100th and 1st Ave NE and see very few cars ever parked there. That area could contain one of these neighborhood centers without destroying a single home. It would be closer to transportation, and still very close to schools and shopping. The plan as it is is ridiculous.

288-2
cont

Cheryl Kordick
823 NE 98th Street
Maple Leaf resident

From: Eugene Kramer
To: PCD_CompPlan_EIS
Subject: Comprehensive Plan Housing Abundance Map.
Date: Monday, May 20, 2024 3:27:44 PM

CAUTION: External Email

Please bring back the Housing Abundance Map for the Comprehensive Plan. This city desperately needs more housing. Don't programmatically water down or obstruct our community efforts do build more housing now.

289-1

Respectfully,
Eugene Kramer

Foundation Board Member,
Grants, Fundraising, Seattle Subway
grants@seattlesubway.org
www.SeattleSubway.org

Letter 290

From: Thomas Kuczmarski
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 7:15:29 AM

CAUTION: External Email

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

290-1

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Thomas Kuczmarski
thomaskuczmarski@gmail.com
815 Northeast 97th Street
Seattle, Washington 98115

Letter 291

From: Carrie Lafferty
To: PCD_CompPlan_EIS
Cc: Moore, Cathy
Subject: Environmental Impact Statement comments
Date: Thursday, May 2, 2024 7:30:37 PM

CAUTION: External Email

I am writing as a resident of Greenwood neighborhood in Seattle for 24 years. I am writing with comments and questions on the Environmental impact statement relative to Seattle's Comprehensive Plan.

Section P 3-3 states that "none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild." What will be the direct impact of the Comprehensive plan on Seattle's flora and fauna? How can this much development not be expected to impact the urban wildlife and plants?

291-1

Section P 3-3 states that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." What specific data and analysis predicts that tree planting programs, coupled with increased non-living landscaping, will compensate for lost urban forest? How can established trees be replaced by smaller sapling tree plantings? This will take a very long time.

The plan states that Seattle will make progress toward its 30% canopy goal. The new tree ordinance substantially reduces private land available for trees. How much public land is then going to be available to reach the 30% goal? How many trees will need to be planted in these areas every year to make up for trees removed by development? This is utter ridiculous to cut down established large trees that already provide canopy and think they will be able to be replaced in our lifetimes!

Thank you,
Carrie

Carrie Lafferty, PT
Guild Certified Feldenkrais Teacher
Master Healing Qi Gong Teacher
https://protect2.fireeye.com/v1/url?k=31323334-50bba2bf-31321b84-4544474f5631-0da3d97881cda313&q=1&e=f5769d80-182c-482a-91e6-76bb50388c56&u=http%3A%2F%2Fwww.movementfromwithin.net%2F
https://protect2.fireeye.com/v1/url?k=31323334-50bba2bf-31321b84-4544474f5631-863710b83fc9e38f&q=1&e=f5769d80-182c-482a-91e6-76bb50388c56&u=http%3A%2F%2Ffeldenkraisteachersinseattle.com%2F

Creator of The Walking Way: Stepping Into Awareness (6-CD Audio Series)

P.S. I wanted to remind you of my weekly Feldenkrais and Qi Gong classes on Mondays. Please see my Calendar page.

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Letter 292

From: J. Lange
To: PCD_CompPlan_EIS; LEG_CouncilMembers
Subject: Comment on DEIS
Date: Monday, May 6, 2024 1:40:21 AM

CAUTION: External Email

Please note my comment on the DEIS:

292-1

1: Section P 3-3 states that “none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild.” What is the impact of the plan specifically on Seattle’s plants and animals?

2: Section P 3-3 states that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." What analysis shows that tree planting programs, coupled with increased hardscape, will compensate for lost urban forest?

3: The plan states that Seattle will make progress toward its 30% canopy goal. The new tree ordinance substantially reduces private land available for trees. How much public land is available to reach the 30% goal? How many trees will need to be planted in these areas every year to make up for trees removed by development?

Sincerely,
Janet Lange
11733 Sand Point away NE
Seattle 98125
prettysharppencil@ gmail.com

Sent from my iPhone

DEIS StoryMap Comment

Name: Aileen Langhans

Email: aileenmargaret@yahoo.com

Date: 5/6/2024

Comment:

Please respond to the following questions in response to the City's DEIS:

I. The plan's details provide many sketches of multi-unit complexes in family neighborhoods, but they only include city blocks that are completely flat. Our neighborhood is filled with steep hills. If we try to build a DADU in our backyard, most of it would be underground. How would these designs be adaptable to various geographical limitations?

II. Our neighborhood lots are far less than the 5000 square feet assumed in the various sketches provided in the Plan's details. Those variations in styles already appear to result in the loss of valuable open space; but they would not be practical on our lots, where the current homes already supersaturate the use of the available square footage. So, how can these designs be adapted to our narrow lots, purposefully designed that way in the early 1900s to maximize coverage and profits?

III. What happens to our lower 1 to 1 ½ story houses with solar panels if they become surrounded by 4-5 story box structures which will block access to the sun?

293-1

IV. Is anyone addressing the issue of light pollution?

V. Why doesn't' the City consider and factor in these losses, when acclaiming their success stories:
i. The loss of existing affordable housing in apartment complexes razed in the process, including the energy it took to construct and demolish those buildings? …
ii. The loss of green spaces as density and mass are rapidly increased? …
iii. The loss of low-rent apartments/homes which house larger families, only to be replaced by efficiency apartments? Instead of justifying the gains by simply counting the numbers of new units, regulations should require an accurate count of the number of residents and family sizes both gained and lost, but not replaced.

293-2

VI. Corner stores may be a wonderful addition to a neighborhood, but the City cannot predetermine whom they will serve. Furthermore, solid corner stores without any meaningful setbacks can create a blind spot for pedestrians and cyclists. Is anyone addressing this safety issue?

293-3

VII. Has the City reviewed its fence regulations? Tall hedges, walls, and solid fencing may lead to a sense of privacy for the residents, but they act as shields which can create a sense of insecurity for the passersby. Instead, if Seattle still wants to retain and expand its title as a "pedestrian-friendly town", these features should be encouraged throughout the neighborhoods:
i. Inviting entrances to the streetscape, including colorful gardens and yards for gathering spaces.
ii. Fences, etc. that are not overwhelming.
iii. Large lobbies for larger complexes
iv. Corner stores, etc. without blind spots

293-4

v. Special emphasis on safety and a sense of community

VIII. How will the City provide larger families, especially multi-generational families of color, with affordable, larger, 3–4-bedroom homes, as they seek a sense of permanency, so that they can raise their children and care for their elderly in one place, without feeling nomadic? Remember there are other concerns for families besides price, such as amenities (schools, libraries, places of worship, convenient and affordable shopping, and gathering places like the YMCA and community centers), safety, and a true sense of community.

293-4 cont

IX. Trees are definitely important, but how will the City encourage gardens and yards, filled with aromas, color, and textures, for our residents to enjoy and for our non-human neighbors to explore and add joy to our lives?

X. Why doesn't the City wait until the results of the Pilot Program first and its 35 projects, which upon analysis and data collection, may positively or negatively influence the structure and promises of the OneSeattlePlan?

293-5

Respectfully submitted on May 6, 2024,
Aileen M. Langhans
206-595-0656
aileenmarget@yahoo.com

DEIS StoryMap Comment

Name: Aileen Langhans

Email: aileenmargaret@yahoo.com

Date: 5/6/2024

Comment:

Please respond to these additional questions in response to the City's DEIS: 294-1

I. How is the entire plan going to achieve any meaningful results in 20 years? Will homeowners be forced to sell, forced to tear down their homes in order to increase housing units? Will speculators and developers be encouraged to let their properties deteriorate, purchase adjacent properties by force, and then make larger multi-plex complexes? How much pressure will be placed by the City on homeowners?

II. Where is the definition of affordability that's used in the DEIS? It's often said that you can't manage what you can't measure. Without a clear definition, the City has nothing to measure against.

III. Will the City's new zone maps be revised independently of any outside influence by developers who may lobby to have carve outs or extensions to the upzoned areas for their personal projects and profits – to the detriment of the entire district/neighborhood and to the upheaval of the long-term aspirations of the City's Comprehensive Plan?

IV. How will the City encourage a variety of home configurations, such as clusters of houses with a central garden/yard? Don't you think that developers will try to maximize profits while minimizing costs? 294-2

V. Why is the City considering the removal of Design Standards and Reviews because of the cost in time in money instead of streamlining the process and including the surrounding communities from the start of the process? 294-3

VI. Why does the City fail to discuss and formalize the transition zones as permanent, impenetrable boundaries that surround the higher density zoning of the Urban Center, etc.? They were designed to protect the bordering family neighborhoods from aggressive infiltration by large-scale development, which could potentially lead to the accumulation of our smaller lots in order to create major complexes. 294-4

VII. Why doesn't the City create general overlay zones to protect family neighborhoods, especially those that are established, already saturated with homes, and have their own distinct character and history? This should be achieved by requiring that all developers of new homes or of major additions follow these steps: notification of the surrounding neighborhood, through mail and signage, of their projects; and engagement with those most affected by the development before the plans are finalized. Furthermore, neighborhoods, all unique and with their own pressures and limitations, should be able to create a simplified set of design standards which can be used at the start of the permitting process. This would lead to a greater sense of cooperation and lessen the need for long, tedious, and formal Design Standard processes by City Boards, which may lead to a compromise no one wants, while creating a feeling of tension and mistrust. 294-5

VIII. How can the City justify its assumption that a rapid increase in the number of units built is more important than meeting the demands for multi-bedroom homes by larger families? Instead, the City made all sorts of promises that affordable housing for displaced and marginalized families would be its focus in the upzoned areas created around the Light Rail Stations. In spite of multiple warnings, the City is now expanding its efforts outward into family neighborhoods in search of such housing, without admitting that their original proposals were mere illusions, as they allowed the rapid growth of tall multi-plex apartments, only to create units for single adults – apodments, group housing apartments, and efficiency units.

294-6

IX. How is the City going to achieve the grandness of this new "OneSeattlePlan"? What is the strategy to create more housing units per lot?

i. Will residents of single-family homes be forced to move out (and if so, where … to the suburbs)?
ii. Will speculators be encouraged to buy adjacent properties on our narrow lots? Will they be monitored, so that they don't allow these properties to deteriorate, in order to expand their purchases, so that larger complexes can become a reality?
iii. In our neighborhood of University Park, the absentee landlords make so much money renting out to large groups of students. What will be their incentive to provide multi-plex home arrangements for families of all sizes – a process that would involve demolishing existing buildings, applying for permits, hiring architects and engineers – all while losing years of income from rent?

We appreciate your sincere and open-minded approach to resolving these issues, in order to correct such errors before the ink dries on the "OneSeattlePlan".

Sincerely,

Aileen M. Langhans

From: Sarah Lappas
To: PCD_CompPlan_EIS; LEG_CouncilMembers
Subject: Comment on DEIS
Date: Monday, May 6, 2024 3:32:22 PM

CAUTION: External Email

To whom it may concern:

Please note my comment on the DEIS:

1: Section P 3-3 states that “none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild.” What is the impact of the plan specifically on Seattle’s plants and animals? 295-1

2: Section P 3-3 states that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." What analysis shows that tree planting programs, coupled with increased hardscape, will compensate for lost urban forest?

3: The plan states that Seattle will make progress toward its 30% canopy goal. The new tree ordinance substantially reduces private land available for trees. How much public land is available to reach the 30% goal? How many trees will need to be planted in these areas every year to make up for trees removed by development?

Sincerely,

Sarah Lappas

DEIS StoryMap Comment

Name: Rebecca Lavigne

Email: rebecca.lavigne@gmail.com

Date: 5/6/2024

Comment:

Of the available alternatives, I strongly prefer Alternative 5 with higher growth targets.

The city should study the impacts of: higher growth targets for Alternative 5; additional Neighborood Centers in Urban Neighborhoods, including off of arterials; social housing in every neighborhood; expanded highrise zoning within a half mile of all light rail stations; greater height and density bonuses within a half mile of transit stops; corner stores allowed mid-block as well as on corners; floor area ratio bonuses that incentivize stacked flat development rather than attached or detached townhomes; an Urban Center around the 145th light rail station; and citywide elimination of parking minimums.

296-1

From: Therese law
To: PCD_CompPlan_EIS
Cc: Saka, Rob
Subject: Environmental impact of comprehensive plan for Seattle housing
Date: Thursday, May 2, 2024 8:01:33 PM

CAUTION: External Email

Dear PCD,

I have three different questions for you concerning the comprehensive plan specifically the environmental impact statement.

First, Section P 3–3 states that "none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild." This seems rather vague because building always disrupts, ecosystems and habitat, cutting down trees, impacts birds nesting, removing lawns, hedges, and plants removes cover and food for animals. Is there any sort of plan to mitigate these disruptions? 297-1

Secondly, section P 3–3 states that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." Again, this sounds vague and disingenuous, most of the builders want to tear down all the trees all the bushes all the hedges when they build these housing units because it makes their construction easier. How can you say it won't have an impact on the tree canopy? Removing mature trees impacts our tree canopy and planting trees will take years to replace what have been destroyed.

Thirdly, the plan states that Seattle will make progress toward its 30% canopy goal. Again the wording is pretty vague. It will make progress. What does that mean? It seems to me that removing mature trees for construction is counterintuitive to making progress towards 30% canopy goal. If the developers are allowed to remove mature trees, will there be any room left to plant trees and are the designs of the buildings such that trees reaching maturity would have room to grow?

Climate change is going to make tree canopy vital for many of our communities. There's an article in the paper today about how energy use is increasing it an alarming rate, and our renewable sources are not keeping up.

It just seems shortsighted to me to allow developers and builders to remove mature trees and then plant new ones when with a little thoughtfulness, ingenuity and planning they could design buildings around the trees, which would make a more pleasing environment for everyone.

Terry Law

206-498-2413 cell

From: Jay Lazerwitz
To: PCD_CompPlan_EIS
Cc: Rivera, Maritza
Subject: Seattle Comp Plan – "personal" Comments
Date: Saturday, May 4, 2024 4:21:36 PM

CAUTION: External Email

Seattle Comp Plan – personal comments from the Chair of the Roosevelt Neighborhood Association:

Seattle is projected to grow and grow, as much or more proportionately as any major city, so setting the growth plan targets appropriately, is the key to making the plan workable. Zoned capacity is not plentiful enough in Seattle. If it were, then housing prices wouldn't be going through the roof. **Increase the housing capacity projections to match future demand; aim for 120,000 new units over the next 20 years.** 298-1

To increase walkability throughout the city there should be more Neighborhood Centers. **Increase the number of new Neighborhood Centers to 50** (as OPCD initially proposed) **and allow buildings six stories and up, near job centers, transit hubs, mixed-used nodes, schools, and parks, to provide the level of density that both reduces overall unit cost and adds homes at the scale needed to address Seattle's shortage.**

It will be in the Urban Centers and Neighborhood Centers where most of the new housing will be developed. Buildings made from mass timber can go up to 18 stories. **Allow for taller midrise housing in these growth areas, as these will all be served by frequent transit. These should allow for a minimum height of 65' and 85', with central areas of Urban Centers where the zoning allows for 12-18 stories.**

WA State HB 1110 will soon allow 4 units per lot in most places in Seattle, and 6 units per lot near major transit stops or anywhere in the city if at least two are affordable. **Increasing the development gross buildable area of Middle-housing is critical to make this a realistic feature of the plan. Raising the FAR from 0.9 to 1.2 (and up to 1.5 for properties within a 800' of major transit and Neighborhood Centers) will be more effective in producing family-sized units in these walkable communities; possibly requiring some affordable and family-sized homes for this trade-off.**

Affordability is a major concern to all of us, and State HB1220 requires that all state comprehensive plans "accommodate housing affordable to all economic segments of the population of this state, promote a variety of residential densities and housing types, and encourage preservation of existing housing stock". **Create significant floor area, height, and density bonuses for affordable and social housing development. Include tax-rebate programs for developers to "include" affordability restricted units as an alternative to the MHA program.** https://www.sightline.org/2024/02/23/now-fully-funded-portlands-affordability-mandate-should-be-a-model/

Displacement is an important consideration as properties are redeveloped. **Include the OPCD proposed anti-displacement strategies in the Comp plan.**

Off-street parking increases the cost of housing and takes up space that could be reserved for tree canopy. **Remove parking requirements for housing on Neighborhood-Residential lots.**

Thank you

Jay Lazerwitz
Chair, Roosevelt Neighborhood Association
206-335-8680

298-1 cont

DEIS StoryMap Comment

Name: Jay Lazerwitz

Organization: Roosevelt Neighborhood Association

Email: chair@artandarch.net

Date: 5/4/2024

Comment:

Zoned capacity is not plentiful enough in Seattle. If it were, then housing prices wouldn't be going through the roof. * Increase the housing capacity projections to match future demand; aim for 120,000 new units over the next 20 years.

To increase walkability throughout the city there should be more Neighborhood Centers. * Increase the number of new Neighborhood Centers to 50, and allow buildings five stories and up, near job centers, transit hubs, mixed-used nodes, schools, and parks, to provide the level of density that both reduces overall unit cost and adds homes at the scale needed to address Seattle's shortage. 299-1

It will be in the Urban Centers and Neighborhood Centers where most of the new housing will be developed. Buildings made from mass timber can go up to 18 stories. * Allow for taller midrise housing in these growth areas. These should allow for a minimum height of 65' and 85', with areas of Urban Centers that allow for 12-18 stories, as these will all be served by frequent transit.

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Include tax-rebate programs for developers to "include" affordability restricted units as an alternative to the MHA program.
https://www.sightline.org/2024/02/23/now-fully-funded-portlands-affordability-mandate-should-be-a-model/

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Off-street parking increases the cost of housing and takes up space that could be reserved for tree canopy. * Remove parking requirements for housing on Neighborhood-Residential lots.

I strongly prefer Alternative 5 with higher growth targets.
The city should also study the impacts of these alternatives:

Citywide elimination of parking minimums
Additional Neighborhood Centers in Urban Neighborhoods
Higher floor area ratios for Urban Neighborhood zoning
Higher growth targets for Alternative 5
Expanded highrise zoning in Regional and Urban Centers
Expanded highrise zoning in Urban Neighborhoods
Expanded highrise zoning at Neighborhood Centers
Expanded highrise zoning around existing grocery stores
Higher floor area ratios for middle housing in all residential zones, such as those corresponding to the state model code for middle housing
Social housing in every neighborhood on affordability
Greater height and density bonuses within a quarter mile of transit stops
Increased building height allowances, in exchange for reduced lot coverage, for increased tree canopy
Granting tax breaks & fee deferrals to housing projects that include affordable units
Development incentives like additional floor area ratio for 2- and 3-bedroom units
Floor area ratio bonuses that incentivize stacked flat development rather than attached or detached townhomes
An Urban Center around the 145th light rail station

299-1 cont

DEIS StoryMap Comment

Name: Jay Lazerwitz

Email: jay@artandarch.net

Date: 5/5/2024

Comment:

I am a homeowner in Roosevelt, and I believe that the City of Seattle did not listen to the overwhelming majority's call for an Alternative 6 vision, which would enable the creation of more walkable neighborhoods. Instead the current draft plan will worsen the many crises (housing, climate, unaffordability) our city faces. To create a more diverse city, the plan should allow taller and bigger buildings in many more places. 300-1

I strongly prefer Alternative 5 with higher growth targets. The city should also study the impacts of these alternatives:

In Roosevelt in particular, I think that the plan should include ideas that support HB1220 for affordable housing throughout the city.

Zoned capacity is not plentiful enough in Seattle. If it were, then housing prices wouldn't be going through the roof. *Increase the housing capacity projections to match future demand; aim for 120,000 new units over the next 20 years.

To increase walkability throughout the city there should be more Neighborhood Centers. *Increase the number of new Neighborhood Centers to 50, and allow buildings five stories and up, near job centers, transit hubs, mixed-used nodes, schools, and parks, to provide the level of density that both reduces overall unit cost and adds homes at the scale needed to address Seattle's shortage.

It will be in the Urban Centers and Neighborhood Centers where most of the new housing will be developed. Buildings made from mass timber can go up to 18 stories. *Allow for taller midrise housing in these growth areas. These should allow for a minimum height of 65' and 85', with areas of Urban Centers that allow for 12-18 stories, as these will all be served by frequent transit.

WA State HB 1110 will soon allow 4 units per lot in most places in Seattle, and 6 units per lot near major transit stops or anywhere in the city if at least two are affordable. *Increasing the development gross buildable area of Middle-housing is critical to make this a realistic feature of the plan. Raising the FAR from 0.9 to 1.2 (and up to 1.5 for properties within a 800' of major transit and Neighborhood Centers) will be more effective in producing family-sized units in these walkable communities; possibly requiring some affordable and family-sized homes for this trade-off.

Affordability is a major concern to all of us, and State HB1220 requires that all state comprehensive plans "accommodate housing affordable to all economic segments of the population of this state, promote a variety of residential densities and housing types, and encourage preservation of existing housing stock". *Create significant floor area, height, and density bonuses for affordable and social housing development.
Include tax-rebate programs for developers to "include" affordability restricted units as an alternative to

the MHA program.
https://www.sightline.org/2024/02/23/now-fully-funded-portlands-affordability-mandate-should-be-a-model/

Displacement is an important consideration as properties are redeveloped. *Include the OPCD proposed anti-displacement strategies in the Comp plan.

Off-street parking increases the cost of housing and takes up space that could be reserved for tree canopy. *Remove parking requirements for housing on Neighborhood-Residential lots.

300-1 cont

If the City of Seattle adopted my above proposed changes, then we would be able to create a more affordable city for everyone.

I strongly prefer Alternative 5 with higher growth targets. The city should also study the impacts of these alternatives:

-Citywide elimination of parking minimums
-Additional Neighborhood Centers in Urban Neighborhoods
-Higher floor area ratios for Urban Neighborhood zoning
-Higher growth targets for Alternative 5
-Expanded highrise zoning in Regional and Urban Centers
-Expanded highrise zoning in Urban Neighborhoods
-Expanded highrise zoning at Neighborhood Centers
-Expanded highrise zoning around existing grocery stores
-Higher floor area ratios for middle housing in all residential zones, such as those corresponding to the state model code for middle housing
-Social housing in every neighborhood on affordability
-Greater height and density bonuses within a quarter mile of transit stops
-Increased building height allowances, in exchange for reduced lot coverage, for increased tree canopy
-Granting tax breaks & fee deferrals to housing projects that include affordable units
-Development incentives like additional floor area ratio for 2- and 3-bedroom units
-Floor area ratio bonuses that incentivize stacked flat development rather than attached or detached townhomes
-An Urban Center around the 145th light rail station

From: Breck Lebegue
To: PCD_CompPlan_EIS
Cc: James Moschella; Mark Vossler; Beth Brunton; Mariah Harrod
Subject: EIS effect of Seafair Blue Angels
Date: Monday, May 6, 2024 5:33:10 PM

CAUTION: External Email

Good evening and thank you for the opportunity to comment on the PCD Comp Plan.
One Plan states this key value:

"Climate and Sustainability: Meet the challenges of climate change for a resilient future. Seattle residents are feeling the impact of the climate crisis with more extreme weather events every year, disproportionately impacting lower income and communities of color. This Plan introduces a Climate and Environment element that redoubles our effort to reduce our carbon footprint and build resiliency in frontline communities most vulnerable to climate impacts. The new element includes strategies to reduce carbon pollution from key sectors: transportation, development pattern, buildings, energy, and solid waste. It also promotes a wide range of measures to enhance the resilience of our communities and natural environment that are threatened by current and potential climate impacts."

301-1

As a retired USAF Flight Surgeon I loved the roar of aerial demonstration teams like the USAF Thunderbirds and Navy Blue Angels. That was then, decades ago.
Climate science irrefutably demonstrates the environmental harm and human disease caused by fossil fuels--we know better now, so it's time to change our ways.
A coalition of thoughtful health, climate and environmental groups respectfully ask that Seattle and WA state close the chapter on Blue Angels at Seafair.
PM 2.5 particles, green-house gases, and jet noise are not good for us. Let's find some electric aerial demonstration teams--piloted or drones--to wow the crowds.
We look forward to engaging with you on this issue in the near future.
To your health!

Breck
Breck Lebegue MD MPH
WA Physicians for Social Responsibility
Climate and Health Task Force
www.wpsr.org/transportation
brecklebegue@gmail.com
Steilacoom WA 98388
210-414-8419

"Never doubt that a small group of thoughtful, committed citizens can change the world.
Indeed, it is the only thing that ever has."
Margaret Mead

Letter 302

From: Judith Leconte
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 7:53:33 AM

CAUTION: External Email

Comments Planning and Community Development EIS,

Please attend to these issues. I have been to several sites where tree removal has been expedient for the developer but bad for the climate and surrounding neighborhood.

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

302-1

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Judith Leconte
tbacgster@gmail.com
6506 19th A e. N E
Seattle, Washington 98115

From: Richard Lee
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 8:05:07 AM

CAUTION: External Email

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS). 303-1

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
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* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Richard Lee
ricklee1@comcast.net
5210 37th Ave NE
Seattle, Washington 98105

From: Shelly L
To: PCD_CompPlan_EIS
Subject: One plan SEATTLE
Date: Monday, May 6, 2024 1:20:45 PM

CAUTION: External Email

Comments for the One Seattle Plan.

Here are my thoughts about Seattle and its future.

The One Seattle Plan is covering too long of time. In today's climate change, an EIS could only be reliable for information for 5 years. Yes, I am saying every 5 years Seattle needs to access its growth and needs. The SEPA's don't work. They do not improve an EIS, they just refer back to it as if the EIS is a document to be followed, not updated. Every 5 years a full EIS with a Housing, Tree Count and Park evaluations. If 11 houses go up in a 5-year period in a small radius of a mile, with more planned, is it a good idea to ignore the overall environmental impact for another 5, 10 or 20 years? In the last 5 years, in my small 1 mile square, I have seen 20 large evergreens removed, 20 mature deciduous and no replacements

304-1

Apartment buildings cost less to live in than a house. They have less upkeep. Making more houses, will not satisfy housing needs for all income levels. Forcing developers, apartment complex owners to have a percentage of apartments for low income will. 20% for low income (under 45K) with more weight given to those with the least amount of income.

Affordability is not driven by the number of homes built, or even what type home is built. Affordability can only be attained when restraints are placed upon those doing the building and selling. If one is building a home in Seattle, then the type home, the number of inhabitants and the general location needs to be considered. A two bedroom home is not going to house a family, if a family is made up of more than 2 adults. No parking with any home is a disaster. All housing must have parking. An area with no parks, no playgrounds and no parking will not be inviting to a family. How close do those things need to be to housing? I would suggest there be NO crossing of 4 lane roads to get to a park. No further than a mile from a home…is ideal. That is walking distance for younger children.

The thoroughness of what can be done to meet housing and environmental needs, leaves me with many questions the foremost of which is: Why are trees and wildlife habitat required to suffer the most to meet housing needs? What are big businesses, builder's associations, developers, private corporations that buy up the land doing to facilitate new affordable housing? What will be done to guarantee that anything that is "new" will be affordable? For example, the single family homes, are bought by developers, who in turn build 3 or more homes on that lot. That is what the City wants. But that does not increase the affordability of housing. In fact, what it has done is increase the amount of money that a developer, or builder and the like place in their pocket. What has happened is that my property tax has increased, due to the number of homes that are new, in my neighborhood, that have sold for $600K or above. My home is three bedrooms, 900 sq. ft. built in the 1950's. It is being compared to and taxed at the level of the brand new "affordable" houses.

Instead of sending out information and requests for people to grow evergreen trees if they have room, why don't you keep the ones we have??? Not every inch of a lot must be covered with lumber and gravel. Architects could do a better job of keeping trees, as could the developer, they won't keep the trees if they can remove them so they can build faster. The City needs to ask for more alternative development plans on all properties. Tree retention is an architects problem, design the plan to keep the trees, with no waivers necessary.

I also suggest that one look closely at a plan that opens the entire city, or at least the "poorer" areas of the city to two, three or more houses on one lot. Those homes are apartments with thicker walls,

and larger halls between them. That is not healthy. That is a disaster waiting to happen. Of course, if one is looking to have cigarette box style of architecture for the future of Seattle, then I guess that open, build whatever you want in the outlying areas and "poorer" areas will fill that bill.

The type homes being built waste space. High ceilings, and lots of windows is not going to make better housing, or affordable housing. But that is the style builders have chosen for Seattle. The cost to maintain such a home will increase rapidly. The cost for electricity in this city climbs, reminiscent of a hiker on Mt. Rainier…ever higher, except with the mountain there is a peak, with City Light there is no such thing.

There are 11 homes that have been built in my 1 mile walk around the edges of the neighborhood. That does not count anything inside that path, just the outer edges. Of the 11 homes, I have seen trees removed, with no replacements (we don't have sidewalks, so trees have no where to be replaced too). We don't have walking paths, and if such things were made, there would be no parking…everyone around here has cars, and if there are two adults, there usually are two cars. If there are teenagers and young adults in that mix, there are even more cars per house. No replacement trees. Can you imagine what that does for the environment? What that does to people? I live between I-5 and 99. I live on 135th not far from the new car garage, the 100's of apartments going up on the Shoreline side of 145th, and not far from the Kraken stadium. Guess what, there is already a lot of pollution and high density housing in this area. We don't need more tree removal, oversized houses and no parking. We already have increased traffic, speeders, and crumpled traffic islands.

304-1 cont

People can live in apartment buildings. There are a lot less costs for upkeep, taxes, and insurance plus other home owner costs. There is no need to have a house for every person in Seattle. Some people would like to live in an apartment complex, as long as it has play areas, and parking. Families like the security offered in an apartment complex (if it is designed to protect the children). Apartment buildings can easily be accessible to the disable and elderly. The 2 and 3 story houses I am seeing are not accessible, due to the steps.

Do trees and wildlife habitat have a monetary value? Do trees and wildlife habitat have any health benefits that are very important to the citizens of Seattle? Should those health benefits, which would be available to all income levels, be considered? Are they? What about the infrastructure value for older, mature trees? Is that being considered in this rush to make Seattle a high density population? Are new sapling street trees really going to cover the infrastructure needs of this City? Do they need to be kept, even if it means less housing on that lot? My answer is yes, those trees help with air quality, low upkeep for leaves, and highly useful when it comes to rain, because they retain water. Can a 7 ft sapling deciduous do that? Think about it. How many years would it take for a sapling to do the work of a 100 ft Fir tree? Instead of sending out information and requests for people to grow evergreen trees if they have room, why don't you keep the ones we have??? Not every inch of a lot must be covered with lumber and gravel. Architects could do a better job of keeping trees, as could the developer. Unless forced they won't keep the trees if they can remove them so they can build faster.

City parks can only do good, where the city park is, and if they are properly maintained. Most of Seattle parks are not maintained to the degree necessary. Garbage, and non-native plants take over quickly, unless it is used for league play, which increases traffic in an area. A City park 2 miles from my home is not going to do any good for my houses cooling and heating. But the Urban Forest that the School District is going to want to remove does. The Fir trees in my yard do.

Do trees have value? Yes, all trees have value. A tree is worth its age in gold. A tree is worth its age to keep a city and its inhabitants healthy. The taller, stronger, older trees are better than any forest of saplings. One tall, strong, older tree can supply better oxygen, infrastructure, cooling, and heating needs of a home owner than 20, 7-10 ft trees. An Evergreen tree supplies help year-round a deciduous helps mostly in the summer to keep away heat islands. Both types of trees are needed. When a builder comes along, the first thing to go are the oldest trees. . .at a tremendous cost to the

environment.

I see that my options are minimal in the One Seattle Plan, sad as that may be. I have been advised that the best options will be 2. I am not sure about that, since it still leaves a lot of questions about how Seattle is going to obtain "affordable" housing and keep trees so it can be called an Evergreen City with trees.

Having a chance to talk with others, I see that there are issues that must be addressed in a more direct manner. More analysis, and less speculative guessing is required. At no time should tree removal be considered a first option for development. As I stated earlier, an EIS is simply not a good idea as a map for a future with drastic climate change. The EIS must be easily amended to meet the new challenges a City will have. Tree retention must be a priority, if climate change is to be met head on. Heat Islands must be mitigated with more trees, not less. Building lots must have better space usage, that retains trees. No more stunts of saying "we will keep the tree if we can" and then have that tree the first thing to be removed by a bulldozer…with the yellow tape surrounding it.

204-1 cont

Note the following:

P 3-3-29-30 Please analyze the potential impact of the 5 options on Seattle plants and animals. **This is a Seattle EIS, not a regional or state EIS.** Saying "unlikely to result in appreciable impacts on regional populations of plants or animals'" and "none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild" is avoiding commenting on the specific impacts on Seattle plants and animals. **Logically any tree removal will have an adverse impact on plants an animals. The more trees removed in a smaller area will have a larger impact on those animals in that area. Remove large older trees, and you won't see the Ravens and Eagles that I have seen this Spring.**

- p 3-3-30 Saying that "none of the action alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." is not backed up by facts but speculative at best. The new tree protection ordinance actually increases the potential for tree removal in several ways. One is that all the developmental areas covered by the ordinance state that the newly defined "basic tree protection area cannot be modified" despite Portland, Oregon and the Northwest Society of Arboriculture saying it can be modified to save trees. This and current lot coverage of 85 - 100% for multifamily lots and above and rezoning to occur means more trees, especially large ones, will be removed. What is your estimation of potential canopy acreage loss (over 5 year periods consistent with the city's canopy studies) with increased development density in each alternative? **Again, if you remove trees, that changes the environment. That is not a statement of genius quality, it is a statement of fact that any person who wants to evaluate truth will see. If you take away a tree it changes the tree canopy. PERIOD. It is easier to modify where a house will be placed on a property, and how to build that house for maximum residency, than it is to replace a 100 year old tree… or even 20 year old tree.**

- What is your estimation of planting needs and time frame to replace the lost canopy (over 5 year periods tracked by the city's canopy study)? **Simply put, and much easier to understand, if you cut down a 100 year old tree…it will take 100 years to replace**

it. And even if you "replace" it with small caliber trees, it will take 100 of those small 7-10 ft trees to make up 50% of the loss from that old tree… and that doesn't include the pollution released into the atmosphere the minute the old tree is cut down. One never recovers that pollution that immediately goes into the air. Be wise, keep the tree.

304-1 cont

- Is canopy replacement equivalence even possible with replanting since removed trees, if not removed, would have increased growing according to scientific articles? **Like I said, you never replace what you take away when you remove an old tree. You will NEVER replace it.**

- What is the acreage available and suitable for planting trees in each of the following public areas- the city's right of ways, Natural Areas and Developed Parks? **What good will it do the heat island in my area if you plant trees away from my home?**

- How many trees and what size will need to be planted in these areas every year to make up for trees and canopy removed during development on lots? **Basically, how much more will it cost the city to plant trees, keep trees alive, and hope for a quick canopy recovery compared to the rampant developer, chain saw, money in the pocket scheme of the developer?**
- What is the available acreage available to plant trees on private property? **Land is at a premium, it would be wiser to keep trees, than to find private property to plant trees on. Maybe even pay people to keep their trees?**
- When will it be possible to reach the 30% citywide goal? **That is rhetorical, there is no way on God's green earth to get 30% canopy with 85% hardscape…**
- What potential is there for more than 30% tree canopy in Seattle over time? **Read previous point, Seattle is doomed to less than 30% canopy.**
- Is up to 40% canopy coverage, over time, as proposed in the previous Comprehensive Plan possible? **Again read the above bullet point.**

- Canopy volume, especially of coniferous trees during our rainy season, are critical factors in reducing stormwater runoff. What is the projected loss in canopy volume over the next 20 years as big trees, including conifer trees are removed? **What is it going to cost in man hours, equipment and infrastructure damage??**
- What is the projected increase in stormwater runoff and what costs are associated with on site and alternative city water management policies of stormwater and pollutant runoff as a result? **You won't cover the ditch surrounding my house, because it would create a problem for the City management of storm water damage, and I have 5, 100 year old trees in my back yard, what are your plans for the rest of the**

City when you remove all the trees? Are you going to put ditches in???

More comments about other tree problems this City has:

- Amend the Tree Protection Ordinance to require developers to maximize the retention of existing trees 6" DSH and larger. **Keep trees, especially trees with a decent start to their growth.**
- Give SCCI Director the ability to ask for alternative site designs to save trees. **Architects are supposed to be smart, that is why they went to school for so many years, they should be able to give more than one design that keeps trees, and the SCCI Director should make them do so. Time to let the SCCI Director get real answers and choices…isn't that why they were hired?**
- Support building higher and building attached units to allow for tree retention and planting areas like Portland, Oregon has with 20% areas for multifamily and 40% for its 1-4 unit family zone. **Not thrilled with idea, UNLESS the areas with new apartments, multifamily units are built in areas where transportation is, along 4 lane (or more) streets.**
- Amend Tree Protection Ordinance to require ordinance to apply to all city land use zones. **Another no brainer, if you want to protect trees, protect them. Don't play dartboard legislation…throw a dart keep those trees throw another dart cut those down…**
- Remove the "basic tree protection area" loophole in the Tree Protection Ordinance that allows developers to unnecessarily remove almost all large trees on lots. **Since the only thing that makes developers even consider a tree is money, offer them some type bonus, like a reduction in some permitting costs, to keep trees? The bigger the tree, the more the bonus.**
- **And finally, please, please, please make sure all the people checking a development, look at where the fencing is to be around a tree, and if it has been removed, bent up, leaning against the tree, or moved in any direction other than where it should be FINE THE CONTRACTOR. You can't keep a selected save tree, if the tree is damaged during construction…**

304-1
cont

Thank you for reading,
Michele Leonard
13502 Ashworth Avenue North
Seattle WA 98133

Letter 305

From: Judith Leshner
To: PCD_CompPlan_EIS
Cc: Kettle, Robert
Subject: Questions related to Trees
Date: Sunday, May 5, 2024 12:22:13 PM

CAUTION: External Email

Good Day:

Regarding this draft plan, please consider these questions.

Section P 3-3 — Reducing tree canopy will surely impact wildlife and plants in our urban forests. Has even the obvious impact on bird populations been studied? 305-1

Section P 3-3 — How can the loss of tree canopy not result in " . . . significant, unavoidable adverse impacts on tree canopy cover." We're trying to save many trees, an **urban forest**, not just a single tree here and there.

The newly adopted Seattle Tree Ordinance actually provides less protections for our City's trees. How does the City plan to achieve the long-time goal of 30% tree canopy?

Thank you for your consideration.

Sincerely,
Judith Leshner
2568 10th Ave. W.
Seattle, WA 98119

From: Sharon LeVine
To: PCD_CompPlan_EIS; LEG_CouncilMembers; Harrell, Bruce
Subject: Comp Plan Draft EIS
Date: Thursday, May 16, 2024 11:51:38 PM

CAUTION: External Email

Although our family supports the Alternative 1 (no action baseline), Alternative 2 will be the least destructive to Seattle's exceptional tree canopy, our vegetation and the urban wildlife that enhance our environment !

Further study the environmental impacts of Alternative 2 for the EIS.

306-1

Implement the following mitigation measures to help compensate for the loss of many exceptional, significant and mature trees.

- Amend the Tree Protection Ordinance to require developers to maximize the retention of existing trees 6" DSH and larger.
- Give SCCI Director the ability to ask for alternative site designs to save trees.
- Support building higher and building attached units to allow for tree retention and planting areas like Portland, Oregon has with 20% areas for multifamily and 40% for its 1-4 unit family zone.
- Amend Tree Protection Ordinance to require ordinance to apply to all city land use zones.
- Remove the "basic tree protection area" loophole in the Tree Protection Ordinance that allows developers to unnecessarily remove almost all large trees on lots.

From: Sarah Lewis
To: PCD_CompPlan_EIS; LEG_CouncilMembers
Subject: Comment on DEIS
Date: Monday, May 6, 2024 5:17:19 PM

CAUTION: External Email

Please note my comment on the DEIS:

1: Section P 3-3 states that “none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild.” What is the impact of the plan specifically on Seattle’s plants and animals?

307-1

2: Section P 3-3 states that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." What analysis shows that tree planting programs, coupled with increased hardscape, will compensate for lost urban forest?

3: The plan states that Seattle will make progress toward its 30% canopy goal. The new tree ordinance substantially reduces private land available for trees. How much public land is available to reach the 30% goal? How many trees will need to be planted in these areas every year to make up for trees removed by development?

Sincerely,

S. Lewis

From: Christine Lewis
To: PCD_CompPlan_EIS
Subject: Proposed zoning changes for Winona neighborhood
Date: Monday, May 20, 2024 1:52:15 PM

CAUTION: External Email

Please keep Green Lake perimeter as it is. I do not live on W Green Lake Drive N but the lake is a gem and should not be ruined by developers who care only about making money.

Development of the neighborhood village should occur along the arterials not neighborhood streets. Changing zoning in those areas will only benefit developers and not help with affordable housing. 308-1

Christine Lewis

Sent from my iPhone
Please excuse my brevity!

From: Daniel Lim
To: PCD_CompPlan_EIS
Subject: Comp Plan Feedback
Date: Monday, May 20, 2024 2:52:00 PM

CAUTION: External Email

While the proposed comp plan is a good step in increasing housing for our communities. I'm disappointed that consideration is not currently being given to increase the FAR/coverage for smaller middle housing projects. We are behind and below the state other municipalities adopted standards. Without and increase in FAR the units build will be smaller and it will also disincentivize them from being built at all as less livable units are less desirable and therefore make less financial sense for a developer. In short, Seattleites want more housing options, a sixplex boom can bring down housing costs, underbuilding with the current townhome model can be a forever mistake, the state and other cities are setting a higher standard on lot coverage and there is need for more divers housing options that can accommodate families and multigenerational groups. 309-1

Lastly, I disagree on the reduced zoning for South Seattle neighborhoods. This is in fact redlining, artificially devaluing these properties preventing those individuals from realizing the full value of their properties as well as develop for their own community needs.

Thank you for you consideration and I hope that you make the right choice.

Daniel Lim
Vice President
Lee & Associates | Seattle

D 206.773.2692
C 206.928.2311
O 206.773.2696
dlim@lee-associates.com

320 W Galer Street | Suite 100
Seattle, Washington 98119

Website | LinkedIn | View Listings
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From: Pat Limberg
To: PCD_CompPlan_EIS
Subject: Save our trees
Date: Monday, May 6, 2024 7:19:52 AM

CAUTION: External Email

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

310-1

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Pat Limberg
patlimberg@gmail.com
816 NE 95th St
Seattle , Washington 98115

DEIS StoryMap Comment

Name: Susanna Lin

Email: susieinseattle@gmail.com

Date: 5/5/2024

Comment:

The EIS should consider effects on solar panels, light, parking, traffic, public safety (especially on the light rail), tree canopy, mobility for people with wheelchairs or strollers, parks (including dog parks), neighborhood character, small businesses, public art, trash and graffiti. 311-1

DEIS StoryMap Comment

Name: Susan Little

Email: susan-san@q.com

Date: 5/5/2024

Comment:

I generally advocate for denser housing throughout the city in new development projects.
I support Alternative 5. My church, Haller Lake United Methodist, is considering development of low income housing on our property and we would like to be able to include retail space. This would make our neighborhood more accessible and appealing.

312-1

DEIS StoryMap Comment

Name: Christine Loder

Email: cma319@gmail.com

Date: 3/8/2024

Comment:

1. I'm dubious that there will be no overall effect on our area waterways given that we regularly have sewage overflows into the Sound and Lake WA. Can our system really handle 200K more users?
2. Moderate tree canopy loss is not acceptable. The idea that tree loss will be offset as new trees grow is not a given. We know that small trees are not cared for and often die or are stunted. There should be no loss of large mature trees.
3. The idea that overall, it's okay if we see tree loss in the city because "Action alternatives would tend to increase regional tree canopy by focusing growth in urban areas and preventing sprawl" is not valid. "Regional tree canopy" will not keep Seattle cool. We don't want to be a heat island. And, there are growth boundaries that prevent sprawl. All development is infill now. Ask any developer.
4. I'm glad to see renter displacement acknowledged.
5. Public services: The plan mentions we will need 300-700 new acres of parkland. Is there that much empty/available land open that could be added to the park system?
6. Public services: I'm a longtime animal shelter volunteer. We have been overwhelmed as the population has grown. There has been no new funding, no plans for a larger building. As we grow, if there continues to be no plan, animals will continue to suffer and be euthanized.
7: Nowhere do I see mitigation for the impacts (air pollution, pedestrian safety, noise) of more cars on our streets. Even if people less frequently own cars, they still employ Doordash, Uber, Amazon, etc etc. How are we going to keep cars off the road? How about requiring EV only for deliveries? How are we going to ensure pedestrian safety? What about more traffic/speed cams and more traffic calming measures?

313-1

313-2

Letter 314

From: Bill
To: PCD_CompPlan_EIS
Cc: Moore, Cathy
Subject: Comments One Seattle Plan EIS
Date: Monday, May 6, 2024 4:56:30 PM

CAUTION: External Email

Greetings,

Upon reviewing the EIS I have a few questions.

314-1

Section P 3–3 states that “none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild.” How was this determined and who made this determination? Does this mean that all the plants currently growing within the Maple Leaf Neighborhood Center would survive a 50% build out?

Section P 3-3 also states that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." Please provide me with the data that supports this conclusion. This seems impossible to me. Please define significant and adverse.

The EIS indicates that tree planting will mitigate the loss of mature trees. How was this determined?

How did you determine that it will be possible for the city to meet the 30% canopy goal with the estimated increase in housing densities. As a professional forester I do not understand how this will be possible.

I look forward to your response.

Sincerely,

Bill Loeber
1046 NE 89th St.
Seattle, WA. 98115
loeberbill@gmail.com

From: Ryan Lorey
To: PCD_CompPlan_EIS
Subject: Fw: One Seattle Comprehensive Plan Feedback
Date: Sunday, April 14, 2024 10:04:43 PM

CAUTION: External Email

Hello Jim Holmes and OPCD,

I am forwarding my feedback on the draft Comp Plan that I previously sent to the mayor, council, and the general OPCD email address to the email address provided in the OPCD Story Map. Please find it below. 315-1

Thanks,
Ryan Lorey

From: Ryan Lorey <ryanlorey@outlook.com>
Sent: Thursday, April 11, 2024 12:18 PM
To: Cathy.Moore@seattle.gov <Cathy.Moore@seattle.gov>; Tanya.Woo@seattle.gov <Tanya.Woo@seattle.gov>; Sara.Nelson@seattle.gov <Sara.Nelson@seattle.gov>; bruce.harrell@seattle.gov <bruce.harrell@seattle.gov>; opcd@seattle.gov <opcd@seattle.gov>
Cc: council@seattle.gov <council@seattle.gov>
Subject: One Seattle Comprehensive Plan Feedback

Hello CMs Moore, Woo, and Nelson, Mayor Harrell, and the Office of Planning and Community Development,

My name is Ryan Lorey, and I am a Seattle resident of District 5 in the 98125 zip code.

As I am unable to attend any of the in-person events around the Comprehensive Plan update, I am contacting you today to provide my feedback on the draft.

The proposal in its current state is insufficient to meet our housing needs and does not properly incorporate the previous community feedback OPCD received during the initial scoping for the plan. When presented with Alternatives 1 - 5, the community *overwhelmingly* preferred Alternative 5 and a community-led Alternative 6 that would go even further than what OPCD presented. We are in a housing crisis and have been for years. This plan guides our city's growth pattern over the next 20 years. We do not have the luxury to go small, and we have a responsibility as the largest city in Washington - and in the US for hundreds of miles - to build significantly more housing than we have in the past.

Additionally, in the most recent election for city council, not only did every candidate that won explicitly say they supported Alternative 5 when asked, nearly all *candidates* in the general election also supported Alternative 5 or 6. In my view, Seattle's city leaders have a mandate

from voters to lead on housing growth and go big.

My specific feedback is as follows:

1. The plan needs to address HB 1110 provisions that require 6-unit zoning within walking distance of high capacity transit, including trolleybus lines.
2. The plan needs to use the state Department of Commerce's model middle housing zoning ordinance developed as part of HB 1110 implementation as a minimum standard. Ideally, we would allow a set FAR ratio per unit (e.g. 0.4 for 1 unit, 0.8 for 2, 1.2 for 3, 1.6 for 4, etc.). The state's model code tapers off FAR for higher unit counts, meaning larger buildings have a lower per-unit size. In either case, the current proposal from OPCD is too limiting and will not result in many, if any, 6-unit developments.
3. Add back the removed neighborhood centers. No neighborhood should be exempt from density, and the number of neighborhood centers in the draft plan is greatly reduced from the original proposals presented for the lower growth alternatives.
4. Discontinue the practice of focusing all growth along high traffic corridors. This feedback is the most important. Our past and current development patterns focus nearly all housing growth along high traffic roads, which we know from evidence and data are the most dangerous to human health. They result in higher numbers of traffic violence, have higher levels of air and noise pollution, and make for less cohesive communities but cutting them in half. Instead, we should be moving our growth to be within the grids created by these higher traffic corridors rather than running these corridors down the middle of our highest population zones.
5. The plan should *eliminate* parking minimums city-wide.

315-1 cont

Thank you for your hard work on this proposal, and I hope that the community's feedback will be heard.

Thank you,
Ryan Lorey

From: Ryan Lorey
To: PCD_CompPlan_EIS; Harrell, Bruce
Subject: Bring back the original abundance map!
Date: Monday, May 6, 2024 11:46:16 AM

CAUTION: External Email

Hello OPCD and Mayor Harrell,

My name is Ryan, and I am a Seattle resident of District 5 in the 98125 zip code.

I have previously sent an email regarding my feedback on the comprehensive plan update, and want to provide a final bit of feedback. 316-1

I strongly support bringing the comprehensive plan back in line with the original map OPCD drafted before it was pared down to the current map in the draft EIS. This proposal matches up with Alternative 5, which received massive community support. This proposal would also ensure that we can meet our expected housing demand, as well as prepare for unexpected future increases in housing demand (keep in mind our demand has surpassed previous estimates for several planning cycles - we are not doing well at predicting future growth!). Our comprehensive plan should go above our projections and bare minimum requirements to ensure Seattle can become and *stay* a livable and affordable city for all who want to be here regardless of whether predictions hold.

Please bring back this land use map!

Thank you,
Ryan Lorey

From: Nelson Lowhim
To: PCD_CompPlan_EIS
Subject: Increase the housing in Seattle please
Date: Wednesday, April 17, 2024 4:47:53 PM

CAUTION: External Email

Hi,

Hoping you can increase the housing in seattle
By increasing on the plan that the mayor has put out. Thank you

Nelson Lowhim

317-1

From: Nelson Lowhim
To: PCD_CompPlan_EIS
Subject: Re: Increase the housing in Seattle please
Date: Wednesday, April 17, 2024 6:17:07 PM

CAUTION: External Email

I live on 827 14th ave and a dense built up village on 17th and cherry would be great

Best,

Nelson

318-1

On Wed, Apr 17, 2024 at 16:46 Nelson Lowhim <nlowhim@gmail.com> wrote:

> Hi,
>
> Hoping you can increase the housing in seattle
> By increasing on the plan that the mayor has put out. Thank you
>
> Nelson Lowhim

From: General Use
To: PCD_CompPlan_EIS
Subject: Comprehensive Plan
Date: Sunday, May 5, 2024 9:46:38 AM

CAUTION: External Email

I am writing to support the adoption of **Alternative 2** as the development alternative in the update One Seattle Comprehensive Plan.
Most importantly:

- **Amend the Tree Protection Ordinance to require developers to maximize the retention of existing trees 6" DSH and larger.** 319-1
- **Give SCCI Director the ability to ask for alternative site designs to save trees.**
- **Support building higher and building attached units to allow for tree retention and planting areas like Portland, Oregon has with 20% areas for multifamily and 40% for its 1-4 unit family zone.**
- **Amend Tree Protection Ordinance to require ordinance to apply to all city land use zones.**
- **Remove the "basic tree protection area" loophole in the Tree Protection Ordinance that allows developers to unnecessarily remove almost all large trees on lots.**
- **Require developers to submit a Tree Inventory**

Thank you for considering the **essential quality of life** which has made Seattle the special place it is.

- Neil Ludman
  6326 20th Ave NE, Seattle WA 98115

Letter 320

From: Finu Lukose
To: PCD_CompPlan_EIS; LEG_CouncilMembers
Subject: Comment on DEIS
Date: Monday, May 6, 2024 1:59:50 PM

CAUTION: External Email

Please note my comment on the DEIS:

1: Section P 3-3 states that “none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild.” What is the impact of the plan specifically on Seattle’s plants and animals?

320-1

2: Section P 3-3 states that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." What analysis shows that tree planting programs, coupled with increased hardscape, will compensate for lost urban forest?

3: The plan states that Seattle will make progress toward its 30% canopy goal. The new tree ordinance substantially reduces private land available for trees. How much public land is available to reach the 30% goal? How many trees will need to be planted in these areas every year to make up for trees removed by development?

Sincerely,

Finu Lukose

Letter 321

From: Dennis Lund
To: PCD_CompPlan_EIS
Cc: Rivera, Maritza
Subject: EIS
Date: Monday, May 6, 2024 11:41:21 AM

CAUTION: External Email

Hello,

I have concerns about the environmental impact statement for the Comprehensive Plan:

I have watched trees disappear on my block as older houses and yards are replaced by much larger houses and almost no trees and shrubs, and with much more concrete hardscape. So I disagree with the statement in Section P 3-3 that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover". I have seen the tree canopy decline on my street already. How will this plan mitigate lost, established trees as new housing is built that covers more of the lots? 321-1

I would like to know how the city will reach the 30% tree canopy goal. Since the new tree ordinance allows development that will reduce private land available for trees, how will the city provide more public land to make up the difference in order to reach the 30% goal? What is the plan for planting trees to replace trees lost to development?

Are there specific studies/data that support statements in Section P 3-3 that "none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild"? How will the plan impact plants and animals in Seattle?

I support building more housing in Seattle, especially more affordable housing. But we also need to protect and expand the tree canopy in our city.

Sincerely,

Martha Taylor, Seattle 98115

From: David Luxem
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 12:55:18 PM

CAUTION: External Email

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

322-1

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

David Luxem
daluxem1@yahoo.com
1903 SW Hillcrest Rd
Seattle, Washington 98166

Letter 323

From: Sonia Lyris
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 8:10:32 AM

CAUTION: External Email

Comments Planning and Community Development EIS,

I agree that we need more affordable housing. We need livable and vibrant communities, too.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS). 323-1

* The draft EIS lacks the means to protect current 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity, and sustainable urban forestry. This is unacceptable.
* The draft EIS does not analyze the impact of tree loss but speculates WITHOUT PROOF that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover". Really? Without quantification this is meaningless.
* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services. This is unacceptable.

Mitigation recommendations:

* Reduce tree loss by allowing the city to REQUIRE alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
* Require Tree Inventories and Landscape Plans be COMPLETED before tree removal and building permits are issued.
* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Trees are not just pretty, folks. Our canopy is critical to the city's ability to maintain wildlife, pollinators, cope with hot summers and cold winters, mitigate water runoff, and contributes meaningfully to community health.

Don't take our trees away.

Thank you for your consideration.

Sonia Lyris
slyris@gmail.com
PO Box 31181
SEATTLE, Washington 98103

From: Lois Martin
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 6:32:01 AM

CAUTION: External Email

Comments Planning and Community Development EIS,

We need healthy and livable communities.The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

324-1

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, joined housing units, and larger setbacks for street trees.
* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.
* Completely exclude red lined areas, from ALL density bonuses, including non-profit and religious organizations, and remove “highest and best use” zoning from our lots that is causing astronomical property tax increases causing displacement and harm to legacy wealth building.

Thank you for your consideration.

Lois Martin
cdlegacy_206@icloud.com
129 - 21st Avenue
Seattle, Washington 98122

From: niousha mashayekh
To: PCD_CompPlan_EIS
Cc: Kettle, Robert; Woo, Tanya; Nelson, Sara
Subject: Inquiry Regarding Environmental Impact Statement for Comprehensive Plan
Date: Thursday, May 2, 2024 8:10:08 PM

CAUTION: External Email

Dear Seattle Planning Commission,

I hope this message finds you well. I am reaching out with several questions regarding the environmental impact statement (EIS) for the comprehensive plan, aiming to gain a deeper understanding of how the plan will affect our urban environment. 325-1

1. In Section P 3-3 of the environmental impact statement, it is mentioned that none of the proposed alternatives would be expected to negatively impact the survival or recovery of plant or animal species in the wild. Could you provide more detailed insights into how the plan specifically impacts Seattle's plants and animals, considering aspects like habitat preservation and ecosystem health?
2. The EIS also states that none of the alternatives would have significant, unavoidable adverse impacts on tree canopy cover. Can you share the analysis or studies conducted to support this claim? I am particularly interested in understanding how tree planting initiatives and the increase in hardscape will compensate for any potential loss of urban forest cover.
3. With the city's goal of achieving a 30% canopy cover, the new tree ordinance has reduced private land available for trees. Could you clarify how much public land remains available to reach this goal? Additionally, what are the projected annual planting requirements for trees in these public areas to offset the trees removed due to development activities and maintain or enhance our overall canopy coverage?

Thank you for taking the time to address these questions. Your insights will greatly contribute to a more informed decision-making process regarding the comprehensive plan's environmental implications.

Best regards,

Niousha Mashayekh

2617 27th ave W. Seattle, WA 98199

(323)646-2393

niousha26@gmail.com

Letter 326

From: Bernice Maslan
To: PCD_CompPlan_EIS
Subject: important comments on Draft EIS
Date: Monday, May 6, 2024 11:14:17 AM

CAUTION: External Email

Comments Planning and Community Development EIS,

Hello,

I'm a Seattle resident since 1972.Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities. Trees make it far more pleasant and healthy. 326-1

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry. Planting baby trees isn't the same thing.

* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover" This is not true!

* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services. This must be in a timely manner. Trees take years to grow.

Mitigation recommendations:

* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees. Please! This is serious.

* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued. Also crucial!

* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.

* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees. Let us not remove large trees when it can be avoided.

Thank you for your consideration.

Bernice Maslan
bmaslan08@gmail.com
9705 1st Avenue Northwest
Seattle, Washington 98117

From: Cristin Mattione
To: PCD_CompPlan_EIS; LEG_CouncilMembers
Subject: Comment on DEIS
Date: Saturday, May 4, 2024 9:49:24 PM

CAUTION: External Email

Please note my comment on the DEIS:

1: Section P 3-3 states that “none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild.” What is the impact of the plan specifically on Seattle’s plants and animals?

327-1

2: Section P 3-3 states that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." What analysis shows that tree planting programs, coupled with increased hardscape, will compensate for lost urban forest?

3: The plan states that Seattle will make progress toward its 30% canopy goal. The new tree ordinance substantially reduces private land available for trees. How much public land is available to reach the 30% goal? How many trees will need to be planted in these areas every year to make up for trees removed by development?

Sincerely,

Cristin Mattione (she/her)

"shame lives in should. swap guilt with grace. see what happens." - ALOK

Letter 328

From: Gabriel Mauel
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 9:27:58 AM

CAUTION: External Email

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

328-1

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Gabriel Mauel
gabemauel@gmail.com
418 Bellevue Ave E 508
Seattle, Washington 98102

From: kim.mccormick@comcast.net
To: PCD_CompPlan_EIS; LEG_CouncilMembers
Subject: Comments Comprehensive Plan Draft EIS
Date: Monday, May 6, 2024 5:01:38 PM

CAUTION: External Email

Comments: City of Seattle Comprehensive Plan Draft EIS

I prefer Alternative Plan #2. I recognize the need for more affordable housing in Seattle. I would like to see this accomplished via a comprehensive plan that retains as much of our current urban forest as possible, with an emphasis on retaining mature trees and addressing storm water runoff into our streams and wetlands. I am especially concerned about the potential loss of tree canopy in the areas adjacent to the 130th Street and 145th Street Light Rail Stations. For these reasons, I support Alternative #2, which focuses growth and limits the destruction of tree canopy.

329-1

Please review and revise the Plants and Animals Section.

- P 3-3-29-30 Please analyze the potential impact of the 5 options on Seattle plants and animals. This is a Seattle EIS, not a regional or state EIS. Saying "unlikely to result in appreciable impacts on regional populations of plants or animals"' and "none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild" is avoiding commenting on the specific impacts on Seattle plants and animals.

  Specifically, this section ignores bird species that are currently (or were formerly) a Species of Concern in Washington. Seattle is home to several species that are being monitored, including the native Band-tailed Pigeon, Great Blue Heron, and raptors, such as Bald Eagle, Cooper's Hawks, and Merlin. These species require mature trees for nesting and other behaviors. In particular, Merlins were once listed as a Species as Concern in Washington, but they were removed from the list when their numbers rebounded, due to their ability to adapt to nesting in urban areas, such as Seattle, where they nest exclusively in conifers over 100 ft tall.
  Please amend this section to address the retention of large, mature, trees in our urban forest, including residential lots that are slated for development, and acknowledge the importance of maintaining and increasing diversity in urban plant and animal species.

- p 3-3-30 Saying that "none of the action alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." is not backed up by facts but speculative at best. The new tree protection ordinance actually increases the potential for tree removal in several ways. One is that all the developmental areas covered by the ordinance state that the newly defined "basic tree protection area cannot be modified" despite Portland, Oregon and the Northwest Society of

Arboriculture saying it can be modified to save trees. This and current lot coverage of 85 - 100% for multifamily lots and above and rezoning to occur means more trees, especially large ones, will be removed. What is your estimation of potential canopy acreage loss (over 5 year periods consistent with the city's canopy studies) with increased development density in each alternative?

- What is your estimation of planting needs and time frame to replace the lost canopy (over 5 year periods tracked by the city's canopy study)?
- Is canopy replacement equivalence even possible with replanting since removed trees, if not removed, would have increased growing according to scientific articles?

329-1 cont

What is the acreage available and suitable for planting trees in each of the following public areas- the city's right of ways, Natural Areas and Developed Parks?

- How many trees and what size will need to be planted in these areas every year to make up for trees and canopy removed during development on lots?
- What is the available acreage available to plant trees on private property?
- When will it be possible to reach the 30% citywide goal?
- What potential is there for more than 30% tree canopy in Seattle over time?
- Is up to 40% canopy coverage, over time, as proposed in the previous Comprehensive Plan possible?

- What is the projected loss in canopy volume over the next 20 years as big conifer trees are removed?
- Canopy volume, especially of coniferous trees during our rainy season, are critical factors in reducing stormwater runoff.
- What is the projected increase in stormwater runoff and what costs are associated with on site and alternative city water management policies of stormwater and pollutant runoff as a result?

I also support the following mitigation measures:

- Amend the Tree Protection Ordinance to require developers to maximize the retention of existing trees 6" DSH and larger.
- Give SCCI Director the ability to ask for alternative site designs to save trees.
- Support building higher and building attached units to allow for tree retention and planting areas like Portland, Oregon has with 20% areas for multifamily and 40% for its

329-2

1-4 unit family zone.

- Amend Tree Protection Ordinance to require ordinance to apply to all city land use zones.
- Remove the "basic tree protection area" loophole in the Tree Protection Ordinance that allows developers to unnecessarily remove almost all large trees on lots.

329-2 cont

Thank you for your time and consideration,

Kimberly McCormick, Ph D
11517 40th Ave NE
Seattle, WA 98125

DEIS StoryMap Comment

Name: Ethan McCue

Email: ewm6as@virginia.edu

Date: 4/11/2024

Comment:

The impact of higher growth targets should be studied, an ‘alternative 6’. Alternative 5 is the most preferable of current proposals, but more growth appears necessary to comply with state law requiring more density around transit, address historic inequities with SFH zoning being used as a tool of segregation, and to meet our climate goals.

330-1

Letter 331

From: Kym McDonald
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 4:45:38 PM

CAUTION: External Email

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

331-1

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

What is the actual impact to Seattle's plants, trees and animals?

Mitigation recommendations:

* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees. It's honestly egregious.
* Create a Department of Urban Forestry to oversee this plan given the obvious conflict of interest with SDCI

At this point, please choose alternatives 2 or 4 in the comprehensive plan so we can build 100,000 new homes while preserving our trees.

Many other large cities went down the pathway of overdevelopment without consideration of the environmental benefits of keeping our mature trees. They are now regretful and working to reverse their costly mistakes. Write the plan keeping these lessons in mind and show forward

thinking planning that’s not simply for developer profit.

Thank you for your consideration.

Kym McDonald
kymberly.mcdonald5@gmail.com
3848 NE 87th st
Seattle , Washington 98115

331-1 cont

From:	Lori McEwuen
To:	PCD_OneSeattleCompPlan; PCD_CompPlan_EIS
Subject:	Comp Plan Comments - Nitze-Stagen
Date:	Monday, May 6, 2024 4:54:11 PM
Attachments:	image001.png Seattle Comprehensive Plan Comments_Nitze-Stagen.pdf

CAUTION: External Email

To Whom It May Concern:

Comments on the Draft Comprehensive Plan are below and attached via pdf.

Thank you for the opportunity to comment on the draft One Seattle Comprehensive Plan and Draft Environmental Impact Statement. We are writing to express broad support for the comment letter submitted from the Seattle Chapter of NAIOP. We believe that Alternative 5 would be the most successful option for addressing the city's severe housing shortage, though we believe much more can be done to encourage housing production in order to ease the housing crisis and associated issues. 332-1

We support strategies that maximize development capacity and remove or reduce zoning barriers in target growth areas. In addition to the Plan's proposal for a new Regional Center in Ballard, we strongly support a future Regional Center in southeast Seattle. Southeast Seattle is already served by several light rail connections and would benefit from additional investment to support the current residents and increase housing supply. The designation and expansion of Regional Centers should be completed as soon as possible.

We also support residential uses in Manufacturing Industrial Centers, but more generally support true mixed-use development around all transit corridors, including those located in a MIC.

In addition to an increase in the capacity for housing development, the current process for land use entitlements adds significant uncertainty and delay. We support the design review program changes included in HB 1293, but also encourage the City to go further in reducing regulatory barriers. The City should continue to exempt housing projects from design review and SEPA, and should develop a program for more clearly integrating utility approvals (Seattle Public Utilities and Seattle City Light) with the current land use and building permit approval processes.

We do not support additional impact fees or an increase in MHA fees and strongly encourage the City to evaluate the possibility of payment for MHA fees at Certificate of Occupancy, rather than building permit issuance.

Thank you for your consideration of these items and we look forward to continued engagement around the Comprehensive Plan update.

Lori A. McEwuen
Vice President of Development
Mobile 775.771.2553 | Direct 206.889.5949
Email lori@nsco.com

159 S. Jackson Street, Suite 300
Seattle, WA 98104
www.nitze-stagen.com

NITZE-STAGEN

332-1
cont

NITZE-STAGEN

159 South Jackson Street, Suite 300
Seattle, Washington 98104

May 6, 2024

Mayor Bruce Harrell
Rico Quirindongo, Seattle OPCD

via email

Re: Comments on Seattle Draft Comprehensive Plan Update

Mr. Harrell and Mr. Quirindongo,

Thank you for the opportunity to comment on the draft One Seattle Comprehensive Plan and Draft Environmental Impact Statement. We are writing to express broad support for the comment letter submitted from the Seattle Chapter of NAIOP. We believe that Alternative 5 would be the most successful option for addressing the city's severe housing shortage, though we believe much more can be done to encourage housing production in order to ease the housing crisis and associated issues.

332-1 cont

We support strategies that maximize development capacity and remove or reduce zoning barriers in target growth areas. In addition to the Plan's proposal for a new Regional Center in Ballard, we strongly support a future Regional Center in southeast Seattle. Southeast Seattle is already served by several light rail connections and would benefit from additional investment to support the current residents and increase housing supply. The designation and expansion of Regional Centers should be completed as soon as possible.

We also support residential uses in Manufacturing Industrial Centers, but more generally support true mixed-use development around all transit corridors, including those located in a MIC.

In addition to an increase in the capacity for housing development, the current process for land use entitlements adds significant uncertainty and delay. We support the design review program changes included in HB 1293, but also encourage the City to go further in reducing regulatory barriers. The City should continue to exempt housing projects from design review and SEPA, and should develop a program for more clearly integrating utility approvals (Seattle Public Utilities and Seattle City Light) with the current land use and building permit approval processes.

We do not support additional impact fees or an increase in MHA fees and strongly encourage the City to evaluate the possibility of payment for MHA fees at Certificate of Occupancy, rather than building permit issuance.

Thank you for your consideration of these items and we look forward to continued engagement around the Comprehensive Plan update.

From: Meegan McKiernan
To: PCD_OneSeattleCompPlan; PCD_CompPlan_EIS; LEG_CouncilMembers
Subject: Comments on our One Seattle Comprehensive Plan and EIS
Date: Monday, May 6, 2024 11:13:18 AM

CAUTION: External Email

Please accept my comments on the One Seattle Comprehensive Plan and the associated EIS.

I would like to see **Alternative 2** further examined and modified.

Please maintain the existing tree canopy goals of 30% by 2035 and 40% over time and specify how you will meet these goals with data. 333-1

Also, please analyze the potential impact of the final selected option on **Seattle's plants and animals**.

And I have a few questions for you:

- What is your estimation of tree planting needs and a time frame to replace the equivalent lost canopy area and volume (over 5-year periods as tracked by the city's canopy studies)?

- Is canopy area and volume replacement equivalence even possible with replanting since removed trees, if not removed, would have increased growing according to scientific articles?

  What is the acreage available and suitable for planting trees in each of the following public areas: the city's right of ways, natural areas, and developed parks?

- How many trees and what size will need to be planted in these areas every year to make up for trees and canopy removed during development on lots? How many trees and what size for all canopy loss?

- What is the available acreage available to plant trees on private property?

- When will it be possible to reach the 30% citywide goal?

- What potential is there for more than 30% tree canopy in Seattle over time?

- Is up to 40% canopy coverage, over time, as proposed in the previous Comprehensive Plan even possible?

- Canopy volume, especially of coniferous trees during our rainy season, are critical factors in reducing stormwater runoff. What is the projected loss in canopy volume over the next 20 years as big conifer trees are removed?

- What is the projected increase in stormwater runoff and what costs are associated with on site and alternative city water management policies of stormwater and pollutant runoff as a result?

333-1 cont

I am seriously concerned about the significant loss of trees in Seattle as more and more residential lots undergo development. It seems that no mature trees are safe any longer in Seattle. I would like to see the following changes made to mitigate any further increase in the loss of our life-sustaining urban forest:

333-2

- Amend the Tree Protection Ordinance to require developers to maximize the retention of existing trees 6" DSH and larger.
- Give SCCI Director the ability to ask for alternative site designs to save trees.
- Support building higher and building attached units to allow for tree retention and planting areas like Portland, Oregon has with 20% areas for multifamily and 40% for its 1-4 unit family zone.
- Amend Tree Protection Ordinance to require ordinance to apply to all city land use zones.
- Remove the "basic tree protection area" loophole in the Tree Protection Ordinance that allows developers to unnecessarily remove almost all large trees on lots.
- Require developers to submit a tree inventory on lots they intend to develop.

Thank you for your work, and I hope that you will take great measures to ensure that, as we grow our city, we take into consideration all that makes life here so beautiful, sustaining and life-giving: our trees and plants, birds and animals, our creeks and hillsides. The city is not adequately protecting what makes Seattle most livable and beautiful, and we must do better!

Meegan McKiernan
Seattle, WA

Letter 334

From: Tina Michalski
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 7:16:34 AM

CAUTION: External Email

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

334-1

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Tina Michalski
tlmichalski@gmail.com
18412 Thorsen Rd SW
Vashon, Washington 98070

Letter 335

From: Anne Miller
To: PCD_CompPlan_EIS; LEG_CouncilMembers
Subject: Comments re. the Draft EIS - please support development alternative 2
Date: Monday, May 6, 2024 11:58:04 AM

CAUTION: External Email

To whom it may concern,

In regards to the Draft EIS and alternatives for development, please support alternative 2. Clearly Seattle needs new houses but the health of the people living in those houses and in our city depends on preserving our trees and natural resources. Under Alternative 2, about 3,000 acres of currently lower-density parcels may be converted to higher-density uses (neighborhood centers), the smallest area of conversion among the action alternatives (Exhibit 3.3-4). Growth would be focused in neighborhood centers. Among the action alternatives, Alternative 2 would thus have the lowest potential for development-related impacts to vegetation (including loss of tree canopy cover) citywide. 335-1

In addition, Please prioritize the following: Amend the Tree Protection Ordinance to require developers to maximize the retention of existing trees 6" DSH and larger.
Give SCCI Director the ability to ask for alternative site designs to save trees.
Support building higher and building attached units to allow for tree retention and planting areas. Amend Tree Protection Ordinance to require ordinance to apply to all city land use zones. Remove the "basic tree protection area" loophole in the Tree Protection Ordinance that allows developers to unnecessarily remove almost all large trees on lots.

Thanks,
Anne Miller

From: Bonnie Miller
To: PCD_CompPlan_EIS
Cc: Woo, Tanya; Nelson, Sara; Hollingsworth, Joy
Subject: Questions on the Environmental Impact Statement:
Date: Friday, May 3, 2024 9:11:31 AM

CAUTION: External Email

To Whom It May Concern and my elected city council members,

I moved from a neighborhood in northeast Seattle to my current home in downtown Seattle. I miss the bird songs from the large trees in my old neighborhood. I miss walking down the block on the sidewalk and being in the shade of living breathing trees. How does your plan provide those human comforts while setting aside concerns for the existing trees and plants? What are your plans for future human comforts afforded by our natural urban environment? 336-1

Did you do your research to show that future plans will make up for the concrete structures and asphalt parking lots taking over our existing urban forest?

I make trips to my old neighborhood and am astonished by the loss of large old street trees and big trees on private lands that have been removed to build bigger and cover more of the dirt. I do believe that if we are to be a green city, we need to reach for more canopy cover and stop the destruction of the valuable older trees in our private and public lands. I learn that trees removed to build these bigger buildings are replaced but where?! Parks is constantly cutting and removing trees, as is the Transportation department. Who is watching the store? How many trees and where are they to be planted if you intend to reach a goal of thousands of new residences which will remove, not include, trees in the development?

Please consider my comments.

Bonnie Miller
900 University Street Apt 15BC
Seattle, WA 98101-1730

DEIS StoryMap Comment

Name: Cameron Sidney Miller

Email: cameron.sidney.miller@gmail.com

Date: 5/6/2024

Comment:

I am a Ballard renter and city worker. The City of Seattle did not listen to the overwhelming majority's call for an Alternative 6 vision, which would encourage social housing in all neighborhoods. Instead the current draft plan will worsen the many crises (housing, climate, unaffordability) our city faces. To create a more vibrant city, the plan should enable permanently affordable social, cross-class housing to be developed in all neighborhoods.

337-1

It is shocking to me that most, if not all of our major parks and coastlines remain surrounded by single family zoning, promising that the greenest neighborhoods will remain out of reach to all but the wealthiest. In Ballard, for example - a major neighborhood center - our main parks, Carkeek and Golden Gardens, remain untouched. Zoning and FAR regulations should be changed to not just allow but encourage stacked-flat, 6-plexes across the board, at minimum. 8-12 plexes in most places. Our greenest areas should be up-zoned even higher, instead of just our loudest, deadliest arterials. Serving these areas with more transit would both help these new residents, and residents of other neighborhoods access green space.

If the City of Seattle adopted my above proposed changes, then we would be able to provide much needed housing while still preserving and even increasing greenery and access to it, for all.

Thousands of people have already been forced to leave this city, and thousands are already on the streets because of our current inaction. We cannot do less than the minimum, which is the current path our Comprehensive Plan is on. It's time to move forward.

Letter 338

From: Amy Miller Dowell
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 11:17:28 AM

CAUTION: External Email

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS). 338-1

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Amy Miller Dowell
amillerdowell@me.com
2600 2nd Ave., #1902
Seattle, Washington 98121

Letter 339

From: Mireia
To: PCD_CompPlan_EIS; LEG_CouncilMembers
Subject: Comment on DEIS
Date: Monday, May 6, 2024 1:08:26 PM

CAUTION: External Email

Please note my comment on the DEIS:

1: Section P 3-3 states that “none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild.” What is the impact of the plan specifically on Seattle’s plants and animals?

339-1

2: Section P 3-3 states that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." What analysis shows that tree planting programs, coupled with increased hardscape, will compensate for lost urban forest?

3: The plan states that Seattle will make progress toward its 30% canopy goal. The new tree ordinance substantially reduces private land available for trees. How much public land is available to reach the 30% goal? How many trees will need to be planted in these areas every year to make up for trees removed by development?

Sincerely,

Mireia

From: dmoehring@consultant.com
To: PCD_CompPlan_EIS
Cc: Nelson, Sara; Kettle, Robert; Woo, Tanya; Hubner, Michael
Subject: One Seattle Comp plan
Date: Wednesday, April 24, 2024 9:58:06 PM
Attachments: IMG_4320.webp
IMG_3170.png

CAUTION: External Email

"Seattle One" planners,

With the forthcoming light rail stops along Interbay between Smith Cove and Dravus/Nickerson , the Interbay Neighborhood Center designation is regrettably undersized and undervalued to its potential mixed use commercial and mid-rise to high-rise residential given the 2040 transit capacity, proximity to City Center, and immediate proximity to jobs with business office and light manufacturing industries.

340-1

Upgrade the recommendations of 2013 Envision Interbay considering appropriate eco-district and transit oriented models built in other smaller cities (such as Burnaby and New Westminster, British Columbia) that have transformed single-story commercial and parking lots into thriving urban centers.

City planners and partners and agencies can make this happen in current wasted prime real estate within the context of the City and tourism.

David Moehring AIA NCARB
East Magnolia and Interbay resident
312-965-0634

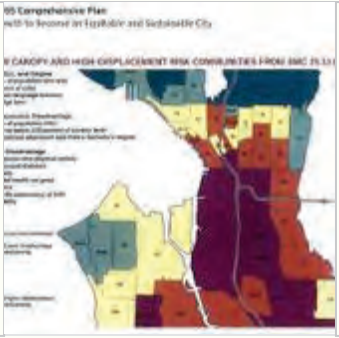
Update
https://www.seattle.gov/documents/Departments/OPCD/OngoingInitiatives/EnvisioningInterbay/InterbayLandUseStudyPreliminaryRecommendations.pdf

Sent using the mobile mail

Letter 341

From: David Moehring
To: PCD_OneSeattleCompPlan; PCD_CompPlan_EIS
Cc: Woo, Tanya; Kettle, Robert; Nelson, Sara; Strauss, Dan; magnoliacommunityclub@gmail.com; QueenAnneCC@gmail.com
Subject: Seattle One"s draft comprehensive plan is not comprehensive - it"s only about one item!
Date: Thursday, May 2, 2024 6:47:17 PM
Attachments: ATT00001.png

CAUTION: External Email



341-1

blank

blank

Seattle does not support a 'single-minded' comprehensive plan that simply backs the financial interests of a few in the property investment industry, and disregards everything else we have collectively worked to achieve.

Plan vertically upward ... rather than planning to evaporate urban open spaces.

Support Urban Planning Alternatives 2 and 4!

341-1 cont

Out of the five alternatives in the plan, alternatives 2 and 4 would retain open moire open space and the greatest amount of tree canopy. According to recent data from Seattle Office of Planning and Community Development, without changing the current 2035 comprehensive plan and current Seattle zoning, Seattle has the capacity to add another 165,000 +/- dwellings.

Therefore, Seattle Legislators have a good reason to choose Seattle One alternatives 2 or 4 so we can add capacity for another 100,000 new homes while preserving our trees, and planting another 100,000 trees to achieve Seattle's tree canopy goals established in 2007.

'Seattle One (idea only)' DEIS questions as to environmental impact:

In what way, if any, does the environmental impact statement sustain urban nature?

1. Section P 3-3 states that “none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species *in the wild*.”

- **Do People Belong in Cities, and Plants and Animals belong elsewhere? What is the impact of the plan specifically on Seattle’s plants and animals?**

341-1 cont

1. Section P 3-3 states that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover."

- **What analysis shows that tree planting**

programs, coupled with increased hardscape, will compensate for lost urban forest?

1. The plan states that Seattle will make progress toward its 30% canopy goal. Seattle's developed properties lost an average of 39% of tree canopy between 2016 and 2021. The new tree ordinance substantially reduces private land available for trees.

- **How will areas of Seattle, such as within the Duwamish Valley, be planned to double their existing trees canopy in order to be equitable with the rest of the city?**
- **How many acres of public land is available to reach our 30% tree canopy goal within the next 13 years?**
- **How many trees will need to be planted in these areas every year to make up for trees removed by development?**
- **What budget has been established for Seattle to expand it's canopy by over 1,000 acres plus an average annual net canopy loss of 50 acres per year?**

Consider what makes Seattle a rose among the USA Cities, and amplify those feature! Plan upward! Retain treasured open space!

David Moehring AIA NCARB
3444 23rd Ave W
Seattle WA 98199

341-1 cont

Letter 342

May 6, 2024

Mr. Holmes.

The following are my comments on the DEIS on the Draft 2024 One Seattle Plan Comprehensive Plan Update.

Robert (Bob) Morgan
559 N 74th Street
Seattle
bmorgan5@comcast.net

Comments:

3.1 Earth

1. "Alternative 5: Combined" Page 3.1-27 states that the alternative "would deter housing growth in the region beyond the city," and thereby indirectly avoid adverse impacts regionally. The same argument is made at 3.1.4 (p. 3.1-32) "Significant Unavoidable Adverse Impacts," (Page 3.1-32), and is a principle of the EIS in general. This "toothpaste" theory is erroneous. The simplistic assumption that allowing greater density in urban areas reduces sprawl in outlying areas has proven to be false. We don't get density instead or sprawl. Experience proves that the result is density and sprawl. All of the alternatives have a high probability of driving those desiring a less dense lifestyle to further and further reaches of the region's rural areas. 342-1

Question: What measures does this plan anticipate to actually deter development in outlying areas of the region other than allowing it in the city?

3.3 Plants and Animals

2. 3.3.2 Impacts. Page 3.3.-13. Here the draft states "the potential for adverse effects on plants and animals would be avoided, minimized, documented, and mitigated to the greatest extent possible through regulatory reviews and permitting processes that apply to individual projects." This is blatantly false or misleading depending upon which of the plausible meanings given to the ambiguous statement. Also, 3.3.3 Mitigation Measures, "Regulations & Commitments" states that statutes and regulations "ensure" that impacts are "avoided, minimized, documented, and mitigated to the greatest extent possible." 342-2

These statements are blatantly false if they mean to say the regulations are so good that they avoid the impacts to the greatest extent possible, which is laughable. For example, Seattle's tree regulations are almost completely ineffective at saving mature trees when private land is developed. Does planting moribund tiny saplings and total lack of enforcement of the viability of those saplings preserve tree canopy to the greatest extent possible? Also, much of the middle housing development as proposed in the draft Comprehensive Plan that has actually

occurred to date, is almost completely devoid of plants and true open space other than parking areas and walkways.

If the statements mean, alternatively, that the impacts would be mitigated to the extent that is provided by regulations that apply, then it is misleading because it seems to imply the regulations are effective.

342-2 cont

Question: Do these statements intend to say that the currently applicable regulations mitigate impacts to the greatest extent possible?

3. Mitigating measures cited under 3.3.3 Mitigation Measures "Incorporated Plan Features" (pp 3.3-24 and 25) include a lot of "encouraging" and monitoring only, except on City property. Programs for tree replacement and preservation of rare heritage trees are great, but significant development of 4-6 units in each Neighborhood Residential area and allowing 7-story development in Neighborhood Centers and other recommendations will result in loss of tree canopy throughout the city. Also, the draft is proposing to increase lot coverage in Neighborhood Residential zones to allow spread-out 2-strory, rather than 3 story development. This will result increased loss of tree canopy.

The conclusion on page 3.3-30 that "none of the action alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover" is clearly false.

3.6 land Use patterns & Urban Form,

4. 3.6.3 "Mitigation Measures:"

Regarding the proposed 4-story, six-unit development in Neighborhood Residential Zones when "affordable" housing is included and 6-story or 7-story development in Neighborhood Centers:

342-3

The proposed plan introduces significant inconsistencies in development scale and density by permitting 4-story development and near full-lot development in Neighborhood Residential zones and would have significant adverse impacts as a result. Page 3-6-186 states: "These impacts, if they occur, are likely temporary and will be resolved over time or reduced by the application of existing or new development regulations and design standards." This is false, because not all properties within the Neighborhood Residential zones will be permitted 4-story or 6-unit development – only those that include "affordable" units, and these developments will be incompatible with the predominant form.

Also, there is no buffer proposed between Neighborhood Residential zones in Neighborhood Centers where zoning allowing seven-story developments is planned. *

*Although the land use changes summary seems to suggest 6 story development, the Executive Summary states on Page two that the regulations would "Allow a range of housing (from

duplexes to 7 story stacked housing) and commercial uses in neighborhood center areas…")
Also see the Growth Strategy Element, page 26, Policy GS 5.3: "Zoning in Neighborhood Centers should generally allow buildings of 3 to 6 stories, especially 5- and 6-story residential buildings to encourage the development of apartments and condominiums."

Perhaps most egregious is the lack buffers proposed where large-scale development along frequent transit arterials is to be extended one-block into adjacent Neighborhood Residential Zones. This is hard to find in the plan documents, but this was conveyed by City staff at a Green Lake/Phinney Ridge Zoom meeting on this subject. This change will introduce extreme transitions in intensity and development scale. An example is along Greenwood Avenue North, where the topography falls off steeply on either side of the ridge. The large-scale zone along Greenwood currently extends only one lot on either side of the arterial for this reason.

342-3 cont

Therefore, the conclusion that there is no significant environmental impact related to land use patterns and urban form is incorrect.

3.10 Transportation

5. The decision to establish Neighborhood Centers prior to localized analysis of pedestrian and transportation conditions will lead to unanticipated significant adverse transportation impacts. Here are two <u>examples:</u>

- The neighborhood center at 65th and Phinney Ave N. is at a location where an undersized street (N 65th Street) is currently overburdened and cannot safely accommodate the kind of increased automobile travel likely with 6 units allowed on all lots, much less with 6, or 7 story development proposed for Neighborhood Centers. Bike lanes and promises of increased transit will not be sufficient to address this impact. These areas need careful local scrutiny before general policies locking in such development is approved. At this location the proposal should prove to be unacceptable.
- The neighborhood center at Linden and 73rd street does not have adequate transit service. There is not a full regional transit stop in this location, but a North-bound stop only. This area should not be included in the proposed blob describing the Neighborhood Center.

342-4

DEIS StoryMap Comment

Name: Robert (Bob) Morgan

Email: bmorgan5@comcast.net

Date: 5/6/2024

Comment:

Comment #1

3.1 Earth

1. “Alternative 5: Combined” Page 3.1-27 states that the alternative “would deter housing growth in the region beyond the city,” and thereby indirectly avoid adverse impacts regionally. The same argument is made at 3.1.4 (p. 3.1-32) “Significant Unavoidable Adverse Impacts,” (Page 3.1-32), and is a principle of the EIS in general. This “toothpaste” theory is erroneous. The simplistic assumption that allowing greater density in urban areas reduces sprawl in outlying areas has proven to be false. We don’t get density instead or sprawl. Experience proves that the result is density and sprawl. All of the alternatives have a high probability of driving those desiring a less dense lifestyle to further and further reaches of the region’s rural areas.

Question: What measures does this plan anticipate to actually deter development in outlying areas of the region other than allowing it in the city?

3.3 Plants and Animals
2. 3.3.2 Impacts. Page 3.3.-13. Here the draft states “the potential for adverse effects on plants and animals would be avoided, minimized, documented, and mitigated to the greatest extent possible through regulatory reviews and permitting processes that apply to individual projects.” This is blatantly false or misleading depending upon which of the plausible meanings given to the ambiguous statement. Also, 3.3.3 Mitigation Measures, “Regulations & Commitments” states that statutes and regulations “ensure” that impacts are “avoided, minimized, documented, and mitigated to the greatest extent possible.”

These statements are blatantly false if they mean to say the regulations are so good that they avoid the impacts to the greatest extent possible, which is laughable. For example, Seattle’s tree regulations are almost completely ineffective at saving mature trees when private land is developed. Does planting moribund tiny saplings and total lack of enforcement of the viability of those saplings preserve tree canopy to the greatest extent possible? Also, much of the middle housing development as proposed in the draft Comprehensive Plan that has actually occurred to date, is almost completely devoid of plants and true open space other than parking areas and walkways. 343-1

If the statements mean, alternatively, that the impacts would be mitigated to the extent that is provided by regulations that apply, then it is misleading because it seems to imply the regulations are effective.

Question: Do these statements intend to say that the currently applicable regulations mitigate impacts to the greatest extent possible?

3. Mitigating measures cited under 3.3.3 Mitigation Measures “Incorporated Plan Features” (pp 3.3-24 and 25) include a lot of “encouraging” and monitoring only, except on City property. Programs for tree replacement and preservation of rare heritage trees are great, but significant development of 4-6 units in each Neighborhood Residential area and allowing 7-story development in Neighborhood Centers and other recommendations will result in loss of tree canopy throughout the city. Also, the draft is proposing to increase lot coverage in Neighborhood Residential zones to allow spread-out 2-strory, rather than 3 story development. This will result increased loss of tree canopy.

343-1 cont

The conclusion on page 3.3-30 that “none of the action alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover” is clearly false.

DEIS StoryMap Comment

Name: Robert (Bob) Morgan

Email: bmorgan5@comcast.net

Date: 5/6/2024

Comment:

Comment #2

3.6 land Use patterns & Urban Form,

4. 3.6.3 “Mitigation Measures:”

Regarding the proposed 4-story, six-unit development in Neighborhood Residential Zones when “affordable” housing is included and 6-story or 7-story development in Neighborhood Centers:

The proposed plan introduces significant inconsistencies in development scale and density by permitting 4-story development and near full-lot development in Neighborhood Residential zones and would have significant adverse impacts as a result. Page 3-6-186 states: “These impacts, if they occur, are likely temporary and will be resolved over time
or reduced by the application of existing or new development regulations and design standards.” This is false, because not all properties within the Neighborhood Residential zones will be permitted 4-story or 6-unit development – only those that include “affordable” units, and these developments will be incompatible with the predominant form.

Also, there is no buffer proposed between Neighborhood Residential zones in Neighborhood Centers where zoning allowing seven-story developments is planned. *

*Although the land use changes summary seems to suggest 6 story development, the Executive Summary states on Page two that the regulations would “Allow a range of housing (from duplexes to 7 story stacked housing) and commercial uses in neighborhood center areas…”) Also see the Growth Strategy Element, page 26, Policy GS 5.3: “Zoning in Neighborhood Centers should generally allow buildings of 3 to 6 stories, especially 5- and 6-story residential buildings to encourage the development of apartments and condominiums.”

Perhaps most egregious is the lack buffers proposed where large-scale development along frequent transit arterials is to be extended one-block into adjacent Neighborhood Residential Zones. This is hard to find in the plan documents, but this was conveyed by City staff at a Green Lake/Phinney Ridge Zoom meeting on this subject. This change will introduce extreme transitions in intensity and development scale. An example is along Greenwood Avenue North, where the topography falls off steeply on either side of the ridge. The large-scale zone along Greenwood currently extends only one lot on either side of the arterial for this reason. 344-1

Therefore, the conclusion that there is no significant environmental impact related to land use patterns and urban form is incorrect.

3.10 Transportation

5. The decision to establish Neighborhood Centers prior to localized analysis of pedestrian and transportation conditions will lead to unanticipated significant adverse transportation impacts. Here are two examples:

- The neighborhood center at 65th and Phinney Ave N. is at a location where an undersized street (N 65th Street) is currently overburdened and cannot safely accommodate the kind of increased automobile travel likely with 6 units allowed on all lots, much less with 6, or 7 story development proposed for Neighborhood Centers. Bike lanes and promises of increased transit will not be sufficient to address this impact. These areas need careful local scrutiny before general policies locking in such development is approved. At this location the proposal should prove to be unacceptable.
- The neighborhood center at Linden and 73rd street does not have adequate transit service. There is not a full regional transit stop in this location, but a North-bound stop only. This area should not be included in the proposed blob describing the Neighborhood Center.

344-1 cont

Letter 345

From: Aileen Morrow
To: PCD_CompPlan_EIS; LEG_CouncilMembers
Subject: Comment on DEIS
Date: Sunday, May 5, 2024 8:48:47 PM

CAUTION: External Email

Please note my comment on the DEIS:

1: Section P 3-3 states that “none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild.” **What is the impact of the plan specifically on Seattle’s plants and animals?**

2: Section P 3-3 states that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." **What analysis shows that tree planting programs, coupled with increased hardscape, will compensate for lost urban forest?**

345-1

3: The plan states that Seattle will make progress toward its 30% canopy goal. The new tree ordinance substantially reduces private land available for trees. How much public land is available to reach the 30% goal? **How many trees will need to be planted in these areas every year to make up for trees removed by development?**

Sincerely,
Aileen Morrow

Letter 346

From: Guila Muir
To: PCD_CompPlan_EIS
Subject: Inaccurate statement re: tree loss (section 3.3.7)
Date: Sunday, May 5, 2024 10:27:19 AM

CAUTION: External Email

The statement that "most canopy loss was not associated with development activities" is inaccurate. Only projects that started and finished in the 5 year period were examined for tree loss. No study counts tree loss in houses started in 2015 but not finished until 2016 or 2017

Tree canopy loss on lots undergoing development should look at loss on **all projects finished in 2016 to 2020**.

Guila Muir
206 725 1994

346-1

Letter 347

From: Guila Muir
To: PCD_CompPlan_EIS
Subject: Comment on the EIS re: TREE CANOPY
Date: Sunday, May 5, 2024 10:10:29 AM

CAUTION: External Email

Here is my comment. Please take it into consideration.

As tree canopy is currently measured, the area does not include analysis of tree canopy **volume.** Without taking both measurements of **area** and **volume** into consideration, we cannot calculate ecological loss when mature trees are removed. Mature trees reduce storm water runoff, combat CO2, etc.

Small, new trees could *could* eventually gain the same canopy size when mature. But how can we possibly expect new, weak, immature trees to even make it to “adulthood”? I walk in my gtreen area nearly daily and see how small young saplings struggle to survive.

347-1

It makes sense to keep and nurture the tall, old trees that we have. Why tear down and then attempt to "re-create” something that is already working for us?

Thank you.

Guila Muir
206 725 1994

Letter 348

From: Alan Muller
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 10:38:03 AM

CAUTION: External Email

Comments Planning and Community Development EIS,

Seattle desperately NEEDS more affordable housing. And we also need healthy air as the climate heats up.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

348-1

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Alan Muller
venerablelekshay@gmail.com
609 Yesler Way, Apt 2-206
Seattle, Washington 98104-3722

Letter 349

From: Callie Neylan
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 8:27:31 AM

CAUTION: External Email

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

349-1

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Callie Neylan
neylano@me.com
1934 4th Ave West
Seattle, Washington 98119

Letter 350

From: Susan Nicol
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 8:37:23 AM

CAUTION: External Email

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities. Large mature trees offer important green infrastructure services, reduce crime, and increase the health of people living in urban neighborhoods.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS). 350-1

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.
Susan M Nicol
Wallingford neighborhood

Susan Nicol
susanmnicol@gmail.com
4310 Sunnyside Ave North
Seattle, Washington 98103

Letter 351

From: Margaret Nims
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 1:38:26 PM

CAUTION: External Email

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

351-1

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Margaret Nims
margot888@comcast.net
PO Box 15455
Seattle, Washington 98115-0455

Letter 352

From: Stuart Niven
To: David Moehring
Cc: PCD_OneSeattleCompPlan; PCD_CompPlan_EIS; Woo, Tanya; Kettle, Robert; Nelson, Sara; Strauss, Dan; magnoliacommunityclub@gmail.com; queenannecc@gmail.com
Subject: Re: [TREE LOSS] Seattle One"s draft comprehensive plan is not comprehensive - it"s only about one item!
Date: Thursday, May 2, 2024 9:19:16 PM

CAUTION: External Email

David,

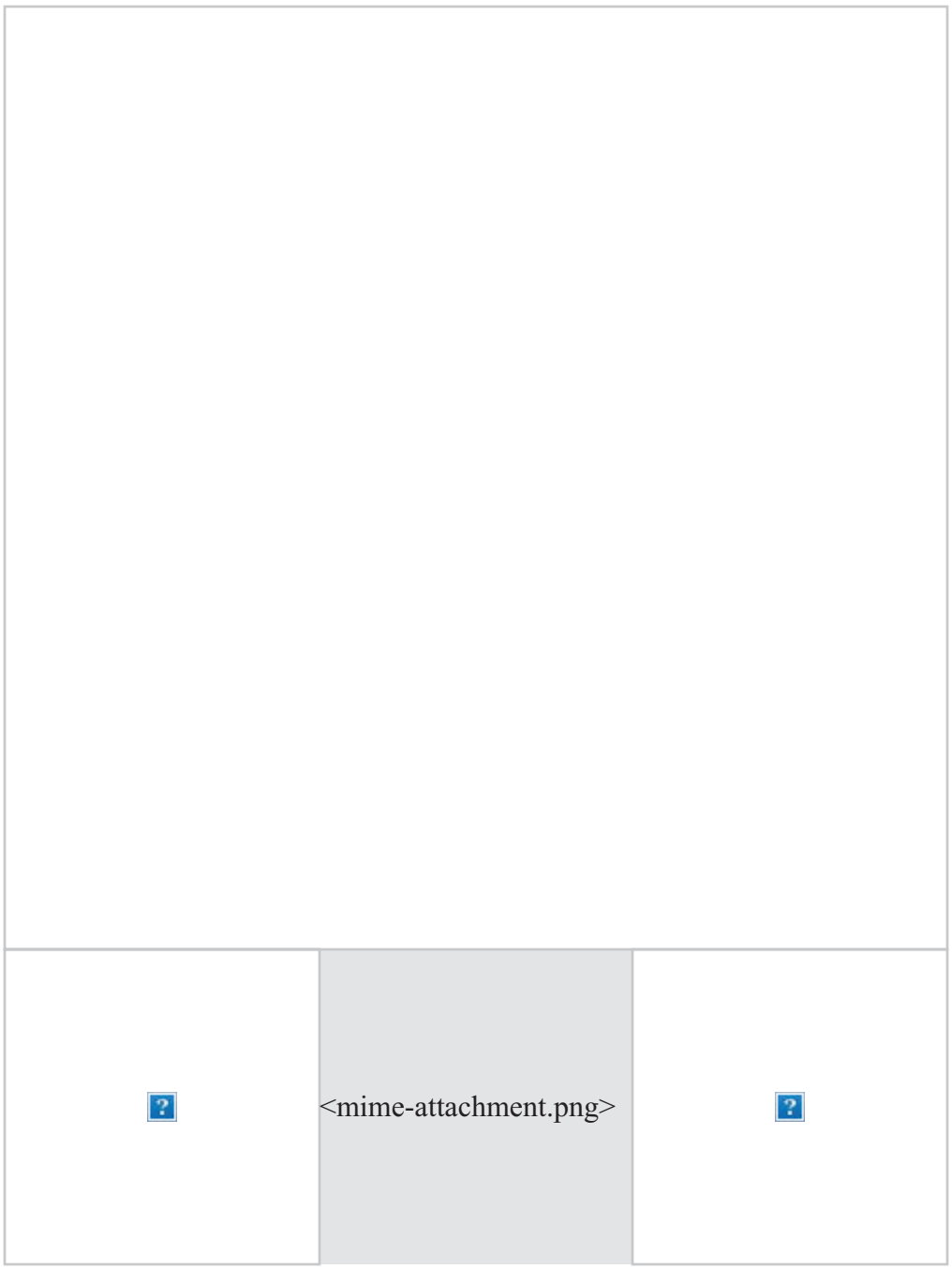
As always your wisdom and attention to detail abound.

Unfortunately, the corruption that has permeated City Hall knows no limits and the likes of Mayor Lowe, puppet Strauss and other key MBAKS plants within the likes of SDCI and OSE have had too much time to set the environmental destruction ball rolling, to ensure their blatant pay offs by the shadowy and very visible real estate investment entities, keep rolling in my lying to the people of Seattle to push in regressive laws and code changes to allow full profit building, regardless of the negative impact to Seattle's neighbourhoods and its diverse residents. 352-1

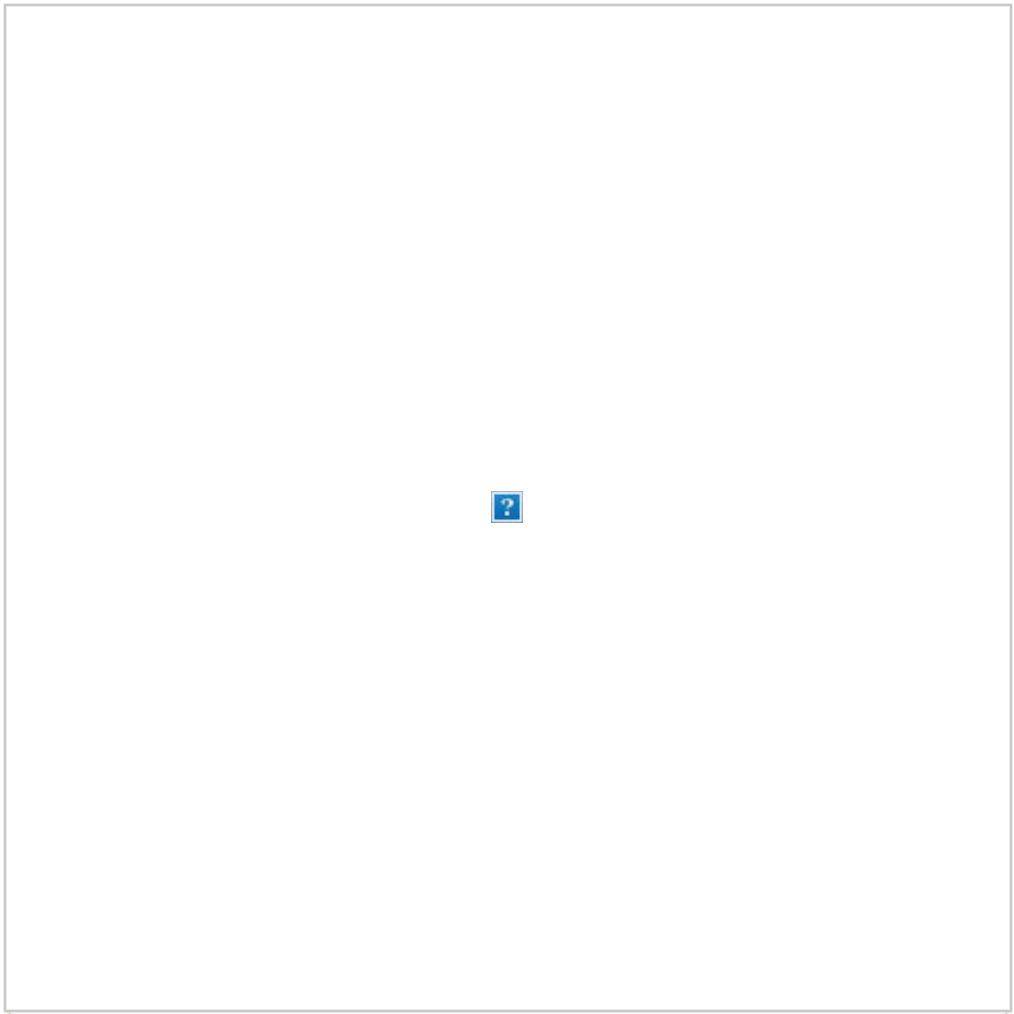
I will expand on my comments soon, so new councilmembers know what their colleagues and predecessors have been up to with their meddling in dirty politics with their grubby, greedy little fingers.

Sent from my iPhone

> On May 2, 2024, at 6:45 PM, 'David Moehring' via SeattleTreeLoss <seattletreeloss@googlegroups.com> wrote:



352-1
cont



352-1
cont

Seattle does not support a 'single-minded' comprehensive plan that simply backs the financial interests of a few in the property investment industry, and disregards everything else we have collectively worked to achieve.

Plan vertically upward ... rather than planning to evaporate urban open spaces.

Support Urban Planning Alternatives 2 and 4!

Out of the five alternatives in the plan, alternatives 2 and 4 would retain open moire open space and the greatest amount of tree canopy. According to recent data from Seattle Office of Planning and Community Development, without changing the current 2035 comprehensive plan and current Seattle zoning, Seattle has the capacity to add another 165,000 +/- dwellings.

Therefore, Seattle Legislators have a good reason to choose Seattle One alternatives 2 or 4 so we can add capacity for another 100,000 new homes while preserving our trees, and planting another 100,000 trees to achieve Seattle's tree canopy goals established in 2007.

352-1 cont

'Seattle One (idea only)' DEIS questions as to environmental impact:

In what way, if any, does the environmental impact statement sustain urban nature?

blank

1. Section P 3-3 states that “none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species *in the wild*.”

- **Do People Belong in Cities, and Plants and Animals belong elsewhere? What is the impact of the plan specifically on Seattle’s plants and animals?**

blank

1. Section P 3-3 states that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover."

- **What analysis shows that tree planting programs, coupled with increased hardscape, will compensate for lost urban forest?**

1. The plan states that Seattle will make progress toward its 30% canopy goal. Seattle's developed properties lost an average of 39% of tree canopy between 2016 and 2021. The new tree ordinance substantially reduces private land available for trees.

- **How will areas of Seattle, such as within the Duwamish Valley, be planned to double their existing trees canopy in order to be equitable with the rest of the city?**

- **How many acres of public land is available to reach our 30% tree canopy goal within the next 13 years?**

- **How many trees will need to be planted in these areas every year to make up for trees removed by development?**

- **What budget has been established for Seattle to expand it's canopy by over 1,000 acres plus an average annual net canopy loss of 50 acres per year?**

352-1 cont

Consider what makes Seattle a rose among the USA Cities, and amplify those feature! Plan upward! Retain treasured open space!

David Moehring AIA NCARB
3444 23rd Ave W
Seattle WA 98199

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========

Help support TreePAC's efforts to create a stronger tree ordinance, more informed residents, and more informed City Officials.
Guide to save trees before it is too late:
https://treepac.org/step-by-step-saving-seattle-trees-guide-new/
Donate to non-profit TreePAC:
https://donorbox.org/support-treepac-and-seattle-s-urban-forest?

You received this message because you are subscribed to the Google Groups "SeattleTreeLoss" group.
To unsubscribe from this group and stop receiving emails from it, send an email to seattletreeloss+unsubscribe@googlegroups.com.
To view this discussion on the web visit https://groups.google.com/d/msgid/seattletreeloss/trinity-ebccb69c-1a2b-4aa6-ab10-97024818af38-1714700744292%403c-app-mailcom-lxa06.

Letter 353

From: Kris Niznik
To: PCD_CompPlan_EIS
Subject: Comprehensive Plan Scenario Choice
Date: Monday, May 6, 2024 5:13:39 PM

CAUTION: External Email

Hello,

I am writing to express my strong concerns about the loss of trees and wildlife habitat which will happen during the proposed development citywide, and especially near the 130th Street Station. Having commercial development so close to the parkland and Flicker Haven is not conducive to protecting the creatures that live there, and the loss of trees throughout the city is a tragedy.

I strongly advocate for Option 1 which will result in less destruction of neighborhoods and greenspace, while still resulting in more housing units. And if there was better planning, instead of just leaving it up to developers to decide what they wanted to do, I'm sure even more trees could be saved and more housing could be created without loss of greenspace. For instance, if you built apartments with underground parking, over a store, in places where currently there are stores with large parking lots. I know it isn't as cheap as clearcutting lots, but there could be more units; it would save open space, and they would be walkable neighborhoods. 353-1

The current plan that just suggests mitigation, but doesn't require it, is extremely unrealistic. When my neighbor cut down a bunch of trees, the temperature in my house rose 10 degrees in the summer. We don't want the entire city to suffer the same way.
Please consider the following questions before making such momentous quality of life decisions for the city. Remember we are known as the Evergreen City.

- How many trees and what size will need to be planted in these areas every year to make up for trees and canopy removed during development on lots?
- What is the available acreage available to plant trees on private property?
- When will it be possible to reach the 30% citywide goal?
- What potential is there for more than 30% tree canopy in Seattle over time?
- Is up to 40% canopy coverage, over time, as proposed in the previous Comprehensive Plan possible?

Please also amend the Tree Protection Ordinance in the following ways:

- Amend the Tree Protection Ordinance to require developers to maximize the retention of existing trees 6" DSH and larger.
- Give SCCI Director the ability to ask for alternative site designs to save trees.
- Support building higher and building attached units to allow for tree retention and planting areas like Portland, Oregon has with 20% areas for multifamily and 40% for its 1-4 unit family zone.
- Amend Tree Protection Ordinance to require ordinance to apply to all city land use zones.
- Remove the "basic tree protection area" loophole in the Tree Protection Ordinance that allows developers to unnecessarily remove almost all large trees on lots.

Thank you so much.
Kris Niznik

DEIS StoryMap Comment

Name: Brady Nordstrom

Email: brady.a.nordstrom@gmail.com

Date: 5/6/2024

Comment:

Broadly speaking, I hope that the plan will be updated to be bolder around housing capacity and growth. As I understand it, this plan assumes that Seattle will grow more slowly than it has over the last 10-15 years. We need more housing capacity than what is being proposed.

I hope that our City leaders will consider expanding urban centers boldly near transit and adding additional neighborhood centers. There are several small hubs in my neighborhood (Beacon Hill) apart from the Urban Village center (near clock out lounge for example) that add vibrancy and convenience to my life. I hope the City will add more or even allow midrise housing (4-8 stories) wherever housing is allowed that is also near frequent transit. We shouldn't be artificially holding back our City's growth; we want abundant housing. 354-1

Allow corner stores in more places-- not just in centers. I have a corner store near my house that is otherwise a 12 minute walk from the grocery store. The Three Little Pigs is a great example of a neighborhood asset that should be enabled in more places. I know the workers and see my neighbors there.

Allow more types of middle housing everywhere in neighborhood residential zones. I currently live in a stacked triplex as a renter. I would love to own a humble stacked flat condo if more housing types like this were allowed. The FAR being proposed in the draft plan would NOT sufficiently allow for stacked flats and would favor taller, skinnier townhomes. I don't have anything against town homes being created and know people that live in them, however, Townhomes are not going to work for a major proportion of people looking to buy (ex: aging adults or people with mobility issues).

I also hope that this City will find ways to include affordability in growth by giving substantial bonuses in FAR, height, etc. for affordable housing provision.

I was born in Seattle and still can't afford a house here. I'd like to start a family here because my job and social network are in the City. Please enable more housing in the City, including homeownership options and rentals. Cities MUST change and evolve and I hope that you will create a bold growth strategy that allows organic growth where it's needed: near transit and jobs and community amenities. The current plan is not bold enough and will likely make our affordability challenges worse and will lock out more people who are already contributing and living in the City.

Letter 355

From: Pennie O
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 7:25:49 AM

CAUTION: External Email

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities. Seattle needs to do both things, and ought to be able to find a way.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

355-1

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Pennie O
pennielink@mac.com
8038 Meridian Ave N
Seattle, Washington 98103

Letter 356

From: Barbara OSteen
To: PCD_CompPlan_EIS
Subject: tree canopy
Date: Tuesday, May 7, 2024 1:33:39 PM

CAUTION: External Email

P 3-3-29-30 Please analyze the potential impact of the 5 options on Seattle plants and animals. This is a Seattle EIS, not a regional or state EIS. Saying "unlikely to result in appreciable impacts on regional populations of plants or animals"' and "none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild" is avoiding commenting on the specific impacts on Seattle plants and animals.

- p 3-3-30 Saying that "none of the action alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." is not backed up by facts but speculative at best. The new tree protection ordinance increases the potential for tree removal and loss in several ways. One is that all the zones that can undergo development under the ordinance state that the newly defined "basic tree protection area cannot be modified" despite Portland, Oregon and the Northwest Society of Arboriculture saying it can be modified to save trees. This and current guaranteed lot coverage of 85 - 100% for multifamily lots and above and rezoning to occur in the Neighborhood Residential zone means more trees, especially large ones, will be removed. What is your estimation of potential canopy acreage loss (over 5 year periods consistent with the city's canopy studies) with increased development and density in each alternative?

356-1

- What is your estimation of tree planting needs and a time frame to replace the equivalent lost canopy area and volume (over 5 year periods as tracked by the city's canopy studies)?

Sent from a concerned citizen
Barbara O'Steen

Letter 357

From: Hali Obray
To: PCD_CompPlan_EIS; LEG_CouncilMembers
Subject: Comment on DEIS
Date: Monday, May 6, 2024 7:46:31 AM

CAUTION: External Email

Dear Seattle City Council Members,

Please note my comment on the DEIS:

1: Section P 3-3 states that “none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild.” What is the impact of the plan specifically on Seattle’s plants and animals?

2: Section P 3-3 states that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." What analysis shows that tree planting programs, coupled with increased hardscape, will compensate for lost urban forest?

357-1

3: The plan states that Seattle will make progress toward its 30% canopy goal. The new tree ordinance substantially reduces private land available for trees. How much public land is available to reach the 30% goal? How many trees will need to be planted in these areas every year to make up for trees removed by development?

Sincerely,

Hali Obray

Letter 358

From: Margaret Okamoto
To: PCD_CompPlan_EIS; LEG_CouncilMembers
Subject: My Comments RE: One Seattle Comprehensive Plan Draft EIS
Date: Monday, May 20, 2024 12:49:23 PM

CAUTION: External Email

What follows are my comments with regard to the Draft EIS:

After reviewing the five alternatives and their impacts, I would prefer to see Alternative 2 selected for a detailed final EIS.

The City established a goal in 2007 of having a 30% tree canopy cover by 2037. A study undertaken in 2022 by the Seattle Office of Sustainability and Environment determined that in the five-year period of 2016-2021, Seattle lost 255 acres of tree canopy.

Along with population growth and the attendant increase in housing must come protections for Seattle's existing trees and commensurate growth in a diverse tree canopy; one that provides protection for animals and other vegetation. I believe whatever the City chooses to do must sustain a healthy ecosystem that promotes well-being, resilience, clean air, and sustainability equitably across all neighborhoods.

358-1

Sincerely,
Margaret Okamoto
margaretokamoto@yahoo.com
2563 6th Ave W
Seattle WA 98119

Letter 359

From: Joe Olson
To: PCD_CompPlan_EIS; LEG_CouncilMembers
Subject: Comment on DEIS
Date: Saturday, May 4, 2024 9:48:11 PM

CAUTION: External Email

To whom it may concern,

Please note my comment on the DEIS:

1: Section P 3-3 states that “none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild.” What is the impact of the plan specifically on Seattle’s plants and animals?

2: Section P 3-3 states that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." What analysis shows that tree planting programs, coupled with increased hardscape, will compensate for lost urban forest? 359-1

3: The plan states that Seattle will make progress toward its 30% canopy goal. The new tree ordinance substantially reduces private land available for trees. How much public land is available to reach the 30% goal? How many trees will need to be planted in these areas every year to make up for trees removed by development?

Sincerely,

Joe Olson
98117

Letter 360

From: Carol Olwell
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 10:28:49 AM

CAUTION: External Email

Comments Planning and Community Development EIS,

The One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS) is deficient for the following reasons.

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

360-1

Mitigation recommendations:

* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration of these requests.

Carol Olwell
cjolwell@gmail.com
2117 5th Ave. W
Seattle, Washington 98119-2809

Letter 361

From: Marisol Ortega
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 5:03:44 PM

CAUTION: External Email

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

361-1

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Marisol Ortega
marisol.ortega@hotmail.com
3596 Tacoma Ave S
Tacoma, Washington 98418

Letter 362

From: David Ortiz
To: Rivera, Maritza; PCD_OneSeattleCompPlan; PCD_CompPlan_EIS
Subject: Comments on One Seattle Plan and Draft EIS
Date: Monday, May 6, 2024 8:43:44 AM

CAUTION: External Email

Dear Project Staff and Council Member,

While I applaud the city's efforts to increase housing while preserving and expanding tree canopy, particularly in disadvantaged areas, I take issue with two areas of the One Seattle Plan (Plan) and Draft EIS (DEIS):

- The Plan clearly states the benefits of proper stewardship of our tree canopy (Land Use policy 4.8 aims to "use tree requirements to preserve and enhance the City's physical, aesthetic, and cultural character and to enhance the value of trees in addressing stormwater management, pollution reduction, and heat island mitigation."). In opposition to this goal, the DEIS states that "development projects on parcels in the Neighborhood Residential or Multifamily management units are likely to result in more loss of tree canopy" and that "alternatives with a higher likelihood of contributing to canopy cover loss in areas with low canopy cover would have an elevated risk of exacerbating local heat island impacts (Section 3.3.2)." To mitigate this, the DEIS states "enhanced restrictions on tree removal will reduce related canopy loss on private parcels, and tree replacement requirements will ensure that a substantial portion of such losses are reversed over time (Section 3.3.3)." While this sounds effective in theory, in practice the current tree protection ordinance, and thus the mitigation plan, is insufficient and my concern is this may result in new heat islands in neighborhoods slated for development. Specifically, the current tree protection ordinance gives developers excessive latitude to remove Tier 2 trees which encroach on their guaranteed 85% developable space in Low Rise zones. To presumably offset this removal they may either replant a comparable tree onsite or pay into a fund which replaces the tree on public land or private land with low tree canopy. While this policy aims to maintain 30% tree canopy across the city over time and benefits disadvantaged areas (both admirable goals), it effectively redistributes trees away from where we need them most, on private land in our neighborhoods. Further, Tier 2 trees take decades to mature and provide protection *now*, not decades from now. To properly mitigate tree loss we need a Tree Protection Ordinance that imposes uniform restrictions on Tier 2 tree removal for all parties, individual homeowners and developers. We need a Plan that reduces heat islands in all areas of the city, not creates new heat islands in some areas. **I support alternative plans 1 and 2 since the DEIS acknowledges they involve the lowest reduction in tree canopy** while still creating 80K-100K homes**.** 362-1

- Some Alternative Plans include a Neighborhood Center at 35th Ave NE and NE 85th St and the DEIS indicates there will be increased traffic and travel time. It is worth noting this intersection has arterials going North, East, and South, but heading West is a non-arterial neighborhood street. The mitigation plans do not address how having a Neighborhood Center connected to a non-arterial street will negatively impact the residential streets in the adjacent neighborhood. Given the current high traffic volume in that area and multiple nearby schools with restricted speed limits during rush hour, it is likely the residential streets will be used as cross streets for overflow traffic. **Can the DEIS comment on impact to neighborhood traffic, noise, and safety in special cases such as NE 85th St.? Does the Plan include alternative Neighborhood Center options in this area which have arterials in all 4 directions (e.g. NE 95th St or NE 75th St)?**

Best regards,

David J. Ortiz, PhD
District 4 resident

Letter 363

From: Allison Ostrer
To: PCD_CompPlan_EIS
Cc: Saka, Rob; Gheisar, Leyla
Subject: Seattle Comprehensive Plan
Date: Friday, May 3, 2024 3:05:46 PM

CAUTION: External Email

Hello, I have some questions about the EIS for the Comp plan.

Section P 3-3 states that no impact is expected on survival to plants and animals. What exactly is the impact of the plan on Seattle's plants and animals, if any?

Section P 3-3 states that "none of the alternatives would be expected to have significant, adverse impacts on tree canopy cover." What evidence do you have to demonstrate this? What analysis, if any, indicates that tree planting programs along with increased hardscape will compensate for lost urban forest?

363-1

The plan states that Seattle will make progress toward its 30% canopy goal. This sounds ridiculous. The new tree ordinance substantially reduces private land available for trees. How much public land is actually available to reach the 30% goal? How many trees will need to be planted in these areas every year to make up for trees removed by development? Also, mature trees absorb much more CO2 than tiny immature trees. Are you taking into account this difference?

Sincerely,
Allison Ostrer
Highland Park, Seattle, WA

Letter 364

From: Dan Overgaard
To: PCD_CompPlan_EIS
Cc: Kettle, Robert
Subject: Comments on One Seattle Plan
Date: Monday, May 6, 2024 11:20:17 AM

CAUTION: External Email

Dear Comp Plan team and Councilmember Kettle,

We have reviewed the draft Comprehensive Plan, and would like to offer some comments.

1. We urge you to select alternative 2 or 4, as they would save more of the City's tree canopy. We are very concerned about the potential loss of tree canopy, as many single family homes will be replaced by multiple units. In our Queen Anne neighborhood we have already seen the removal of many mature trees as replacement structures have eliminated yards and other spaces for trees.

364-1

2. Section P 3-3 states that "none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild." What is the basis for this claim, and what is the impact of the plan specifically on Seattle's plants and animals?

3. Section P 3-3 states that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." What analysis shows that tree planting programs, coupled with increased hardscape, will compensate for lost urban forest? What incentives will there be for developers to retain or replace affected trees? Please include this analysis in the updated plan.

4. The plan states that Seattle will make progress toward its 30% canopy goal. The new tree ordinance substantially reduces private land available for trees. How much public land is available to reach the 30% goal? How many trees will need to be planted in these areas every year to make up for trees removed by development? Please provide supporting analysis in the updated plan.

5. Upper Queen Anne is identified as an Expanded Regional or Urban Center, with expanded development allowed from approximately Galer to Smith, and 6th West to 5th North. We agree with the need for additional housing, but recommend that you reduce the proposed expansion area by at least 50%. Most of the streets and avenues in this expansion area, especially to the east and west of Queen Anne Ave, are effectively one lane streets since there is neighborhood parking on both sides. We do not think this street network will be able to support the added traffic and parking requirements that will be generated by the level of proposed development.

364-2

Thank you for your consideration.

Dan & Gloria Overgaard

Letter 365

From: MICHAEL OXMAN
To: PCD_CompPlan_EIS; LEG_CouncilMembers
Subject: Comment on Seattle Comprehensive Plan & DEIS
Date: Monday, May 6, 2024 2:37:30 PM

CAUTION: External Email

Howdy,
Please include the tree canopy goals of 30% working goal, and 40% aspirational goal, to be accomplished by 2037.
Please provide for enhanced diversity of the ecosystem biosphere.
Please add language that equity will only be achieved by allocating greater funding of maintenance in underserved locations.
Arboreally yours,
Michael Oxman
5612 Delridge Way SW
Seattle, WA 98106

365-1

Letter 366

From: Carmen Pan
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 9:49:31 AM

CAUTION: External Email

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities!

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

366-1

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Carmen Pan
hopes-subsets-0v@icloud.com
418 Bellevue Ave E, Apt 103
Seattle, Washington 98102

DEIS StoryMap Comment

Name: Ryan Paul

Email: ryan@ryandpaul.com

Date: 5/6/2024

Comment:

The city should study the impacts of Floor area ratio bonuses that incentivize stacked flat development rather than attached or detached townhomes, Higher floor area ratios for middle housing in all residential zones, such as those corresponding to the state model code for middle housing, Social housing in every neighborhood on affordability, and Greater height and density bonuses within a quarter mile of transit stops.

367-1

Of the available alternatives, I strongly prefer Alternative 5 with higher growth targets. Ideally I'd prefer that the city look at higher growth targets for Alternative 5

Letter 368

From: Alex Pearson
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 9:02:47 AM

CAUTION: External Email

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

368-1

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Alex Pearson
alexandrabronwyn@gmail.com
5515 28th Ave Ne
Seattle, Washington 98105

Letter 369

From: Anna
To: PCD_CompPlan_EIS
Cc: Strauss, Dan
Subject: Question Regarding the One Seattle Comp Plan EIS
Date: Sunday, May 5, 2024 5:24:34 PM

CAUTION: External Email

Hello!

I volunteer with the Urban Carnivore Project and am concerned about the vagueness of the Draft EIS when it comes to our urban vegetation and wildlife. Please provide more information on the impact specifically on Seattle's plants and animals. I find it hard to believe that the loss of green space and urban canopy will have no impact at all. Development is removing habitat. The removal of habitat harms a species. Any other implication doesn't make any sense to me. 369-1

I also have a hard time believing the Draft EIS actually stated that this would probably minimize development in rural areas. This throwaway line is not backed by facts even though it is tossed around all the time. Please back up your assertions. 369-2

Many years ago.I worked for a land use consulting firm and I know that EIS's are often written to accommodate the client's needs. I am concerned that is the case here.

Please fix this.

Sincerely,

Anna Pedroso

Letter 370

From: Noel Pelland
To: PCD_CompPlan_EIS; PCD_OneSeattleCompPlan
Cc: LEG_CouncilMembers
Subject: Comment on Draft One Seattle Plan
Date: Monday, May 6, 2024 3:14:09 PM

CAUTION: External Email

Dear OPCD Staff and Seattle City Council:

I am a longtime Seattle resident writing to express my serious concern with the draft One Seattle Plan, and to urge modifications that will increase smart growth and help make the city accessible to a wider range of people.

In the past 20 years, I have seen firsthand the rapidly accelerating crisis of affordability in our city, as friends, many of whom are artists, teachers, or other non-tech workers, have been forced to downsize, or relocate out of the city entirely. As a non-tech knowledge sector worker, I have watched my own ability to stay in the city become increasingly tenuous amid constant rent hikes, and the prospect of ownership of any housing vanish entirely. It is widely documented that these issues, of which my experience is far from isolated, are rooted foremost in an undersupply of housing. The continued upward trajectory of housing costs in Seattle seriously threatens the city's long-term prospects as a multifaceted, culturally vital, inhomogeneous place that offers prospects to more than a select few. 370-1

In light of this, I find the proposed plan wholly inadequate for meeting the current moment. Specifically, here are some minimum recommendations to improve Seattle's comprehensive plan:

1. Actually support missing middle housing. Increase the floor-area-ratio above the proposed value, to make development of fourplex and sixplex-zoned areas actually viable. Or, go further to tailor zoning that would support sixplexes configured as in Spokane.

2. Include provisions for transit-oriented development that anticipate elements similar to House Bill 2160 -- larger buildings around all transit corridors would be a major step forward for the city. Rather than waiting to be told what to do at the state level by passage of a similar bill, Seattle should be a leader in this conversation.

3. Eliminate parking requirements -- like other forward-thinking American cities. These requirements discourage and stunt development away from what is most critically needed.

In a larger sense, I recommend city leaders reconsider what kind of city they want Seattle to be: a jeweled but cloistered artifice, that is nice to visit, but only accessible to everyday people through commuting? Or, a modern, hybrid metropolis that understands, accepts, and seizes the opportunities presented by growth? Having a comprehensive plan that anticipates less growth than what would be allowed at maximum by Bellevue is embarrassing. Please keep in mind the widespread support for Alternative 5 during the scoping period and by many city council candidates -- that is the mandate that is present among Seattle's electorate.

Thank you for your time and consideration.

With regards,

Noel Pelland

District 6

Letter 371

From: Sarah Pellkofer
To: PCD_CompPlan_EIS
Cc: Rivera, Maritza
Subject: Comp Plan EIS questions
Date: Tuesday, May 7, 2024 7:54:27 PM

CAUTION: External Email

Hello,

I have a few questions/concerns about the comprehensive plan EIS that I would love for you to consider as the public comment period is coming to a close:

1. Regarding Section P 3-3 which states that “none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild.” Can you say directly what the plans impact on plans and animals will be?

371-1

2. And RE Section P 3-3 which states that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." Do you have any data or studies showing that tree planting program along with with more hardscape will actually compensate for lost urban forests?

3. And finally, the plan states that Seattle will make progress toward its 30% canopy goal. But there will be significantly less private land available for trees with the new tree ordinance so can you say how much public land will be usable for reaching the 30% goal? And about how many trees per year will need to be planted there to compensate for the trees that are removed by development?

Thanks so much for your time and feedback.

Best wishes,

Sarah Pellkofer

Letter 372

From: Nancy Penrose
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 9:05:23 AM

CAUTION: External Email

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

372-1

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Nancy Penrose
mue.rose@gmail.com
2402 E Olive St
Seattle, Washington 98122

From: Jan Peterson
To: PCD_CompPlan_EIS
Cc: Moore, Cathy; Pollet, Henry
Subject: EIS Plan around N 145th and N 130th St stations
Date: Sunday, May 5, 2024 11:42:00 AM

CAUTION: External Email

Mr. Holmes,

I'm writing with comments on the EIS for the North Seattle light rail station areas.

I live just west of I-5 near both of these stations, and appreciated the online EIS presentation by Jim Holmes and others focusing on this area.

N 148th St Station
I believe the assessment that the areas in Seattle on or near N 145th St west of I-5 were "too far" from the coming Shoreline South station for increased development was made in error. It is a short walk in this neighborhood, especially east of Meridian Ave N. Look at what Shoreline has done just north of N 145th. Surely Seattle citizens can walk or ride a bike as well as Shoreline citizens. The future Shoreline non-motorized pedestrian bridge over I-5 at N 148th St will make the distance and ease to the station even easier from neighborhoods just west of I-5. Please re-evaluate. 373-1

N 130th St Urban Center (old "Urban Village")
I fully support an Urban Center near the N 130th St Station. However, the area west of I-5 should do more. Please allow higher apartment buildings (multistory, stacked flats, etc) in the neighborhood between N 130th and N 135th. Allow more zoning for apartments with ground floor commercial / community spaces, especially along 1st Ave NE and all of Roosevelt Ave N. Expand this area west to at least Meridian Ave N. I'm especially concerned that Haller Lake United Methodist Church (at 1st Ave NE and N 133rd St) be able to build such an apartment. Not allowing commercial use there seems really strange, as there is already a daycare center across the street from the church.

Impacts and Mitigation Options for this area:
Sturdy, safe, predictable, planned pedestrian, wheelchair, and bike lanes and sidewalks must be developed for the neighborhoods near the light rail stations.
In this Urban Center West of I-5, planned improvements of 1st Ave NE (added shareway from N 117th to 130th NE) and N. 130th will help. The area needs OFF-CORRIDOR bike routes also. Continue improvements on 1st Ave NE from N 130th to N 145th st. (or at the minimum, from N 130th to Roosevelt Way N.) SDOT planned Neighborhood Greenways in the area (Corliss Ave N, Ashworth Ave N., N 137th, etc.) must be implemented .

Roosevelt Way N (west of I-5) will become a very important 'Boulevard' for this new Urban Center. The city owns 40ft of right-of-way on this street. Plan protected bike lanes AND sidewalks AND trees on Roosevelt between 3rd Ave NE and at least Stone Ave N / N 143rd St. IT WILL BE IMPORTANT TO NOT ALLOW STREET PARKING for new housing on this street. Note the newer housing development on Roosevelt Way N & Meridian Ave N - with a great sidewalk, trees, and space on Roosevelt Way for a protected bike lane. DO THIS. Further north on Roosevelt Way N there are newer apartments / townhomes between Stone Ave N and Lenora Pl N that does not allow for a protected bike lane. PLEASE DO NOT

ALLOW THIS PARKING WITH FUTURE DEVELOPMENT ALONG ROOSEVELT WAY N.

Tree Canopy loss
The Mitigation Options for tree canopy loss include "additional incentives to encourage retaining / expanding tree canopy.' I support this and would like to know how this will be done? There are a number of established trees (possibly 'heritage' trees) in this area. Codes that encourage higher structures that preserve more open ground - including established trees - need to be developed. Developers should work with arborists and submit plan options that include saving established trees whenever possible.

373-1 cont

Green Space: Use city property to develop pocket parks where possible. Consider this for the triangle section on the north side of N 133rd St. at Roosevelt Way N.

Of course, listing the many mitigations in the EIS is helpful, but unless the city takes on the responsibility of ACTING on these mitigations, the Seattle One Comp Plan will result in thoughtless worsening of the quality of life that Seattle residents deserve.

Thank you,

Jan Peterson
Haller Lake Neighborhood

Letter 374

From: Ellen Pifer
To: PCD_CompPlan_EIS; LEG_CouncilMembers
Subject: Comment on DEIS
Date: Monday, May 6, 2024 8:01:17 AM

CAUTION: External Email

Hello,

Urban natural spaces are important to me and what set Seattle apart from other major cities. Urban forestry reduces the overall surface temperature for pedestrians and what make a city not just liveable but enjoyable to live in. Staring at telephone poles through a window instead of trees is also unsightly.

Please note my comment on the DEIS:

374-1

1: Section P 3-3 states that “none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild.” What is the impact of the plan specifically on Seattle’s plants and animals?

2: Section P 3-3 states that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." What analysis shows that tree planting programs, coupled with increased hardscape, will compensate for lost urban forest?

3: The plan states that Seattle will make progress toward its 30% canopy goal. The new tree ordinance substantially reduces private land available for trees. How much public land is available to reach the 30% goal? How many trees will need to be planted in these areas every year to make up for trees removed by development?

Sincerely,

Ellen Pifer

Letter 375

DEIS StoryMap Comment

Name: Emily Pike

Email: elaurelpike@gmail.com

Date: 5/6/2024

Comment:

I am a renter in Ballard, and I believe that the City of Seattle did not listen to the overwhelming majority's call for an Alternative 6 vision, which would allow for more sustainable, car-free or car-light living. Instead the current draft plan will worsen congestion and pollution by forcing more people into long commutes. To create a more sustainable and equitable city, the plan should eliminate parking minimums, convert underutilized golf courses into free public parks and affordable housing, and allow taller and bigger buildings in more neighborhoods.

If the City of Seattle adopted my above proposed changes, then we would be able to reduce vehicle miles traveled, reduce greenhouse gas emissions, and create a more affordable city for everyone. Land use has a huge impact on the environment. We should seek to increase density wherever possible in order to lower per capita greenhouse gas emissions.

375-1

DEIS StoryMap Comment

Name: Emily Pike

Email: elaurelpike@gmail.com

Date: 5/6/2024

Comment:

The city has an obligation to pursue the comprehensive plan as proposed by OPCD last fall--a plan that is much more ambitious in upzoning to increase density and build an equitable and sustainable city for all. The plan should be revised to do the following: allow bigger buildings in more places; restore all 42 originally proposed neighborhood centers to create more walkable environments so people can access the things they need in their immediate area; match or exceed the state floor area minimums and allow more housing, taller housing, and greater lot coverage to increase housing diversity; increase density around transit corridors so that people can rely on more sustainable modes of transportation rather than remaining dependent on personal vehicles; remove parking requirements citywide to further divest from personal-vehicle infrastructure; and allow small scale businesses in all zones including small cafes, stores, services, and even small scale production.

376-1

DEIS StoryMap Comment

Name: Emily Pike

Email: elaurelpike@gmail.com

Date: 5/6/2024

Comment:

It is extremely disappointing that the Mayor's office has disregarded the overwhelming call for a much bolder growth strategy than this plan proposes. During the scoping phase, over 60% of commenters voiced desire for alternative 5 or an even more progressive alternative six, and it's hard to understand why those suggestions have been so watered down in this draft. Seattle residents want to see bold change--more dense housing everywhere, more housing around transit corridors, more corner stores in their neighborhoods to create vibrancy and meet needs locally. We need more fourplexes and sixplexes, not more townhomes. This plan simply does not meet the moment. It will not create enough housing to accommodate the number of new residents projected to arrive over the next 20 years, and low-income residents like myself will inevitably be priced out of their communities.

377-1

DEIS StoryMap Comment

Name: Allison Placido

Email: alli1111@live.com

Date: 4/9/2024

Comment:

Re: the 130th & 145th station areas, my preference is for Combined (Alt 5) or Focused (Alt 2). I live and work in this neighborhood and we expect big, lasting changes that coincide and take advantage of the improvements happening on Aurora as well. Go big or go home.

378-1

Letter 379

From: Helen Pope
To: PCD_CompPlan_EIS
Cc: Rivera, Maritza
Subject: Feedback- Comprehensive Plan
Date: Sunday, May 5, 2024 8:09:37 AM

CAUTION: External Email

As our population increases, the best possible living environment for Seattle will be to increase greening our communities NOT depleting these resources.

In your Comprehensive Plan I'm concerned that in your haste to develop you are ignoring studies from some of the largest urban centers in the world that prioritize increasing green spaces as a way to enhance environmental and ecological benefits, such as mitigation of the urban heat island effect and air and noise pollution.Such benefits are irrefutable.

379-1

To succeed, we will need a whole-of-government collaboration among multiple agencies, including tree preservation organizations and including studies that examine human wellbeing. This balance of power will help us protect the canopy of green where we live, not only in public parks.

The words in your plan skip the details of who makes these choices. Is it the Land Developers or the the hollow if the city continues its same approach to cutting down our trees. I'd appreciate some clarity on the following:

- In your Comprehensive Plan *what specific studies shows planting programs can compensate for the loss of already established larger trees and the increase of hardscape?*

- In section LZU 2.7 it says "Encourage the *preservation* and expansion of the tree canopy throughout the city for the benefit they provide". *What tree advocacy committees and arbor scientists have been involved in the Comprehensive Plan, and what* ***oversight*** *will be in place to ensure scientists will lead the SDCI decisions in the approach to tree preservation?*

Thank you,

Helen Pope
Hpope@live.com

Letter 380

From: Helen Pope
To: PCD_CompPlan_EIS
Subject: Feedback Comprehensive Plan
Date: Sunday, May 5, 2024 5:20:10 PM

CAUTION: External Email

Thank you for the chance to voice my perspective of Seattle future growth.

In your Comprehensive Plan you are not specifically addressing what committee or department will make the day-to-day decisions regarding preserving existing green spaces in city lots (all zones).

This concerns me especially after recent public efforts to save large trees (some of 150 years old) from being cut. My conclusion is there isn't any official tree advocacy group in the city government that has the power to evaluate and preserve trees. Unfortunately this important fact will leave our trees in the hands of Developers and city's short term financial goals. 380-1

I eagerly await your response which clarifies this point, as I hope I'm wrong because it would show us you are ignoring studies from some of the largest urban centers in the world that prioritize increasing green spaces as a way to enhance environmental and ecological benefits, such as mitigation of the urban heat island effect and air and noise pollution. Such benefits are irrefutable.

To help succeed and take the long view to the emerald city, we will need a whole-of-government collaboration among multiple agencies, including tree preservation organizations and including studies that examine human wellbeing.

It is imperative that The Department of Construction and Inspection's authority is balanced by other separate agencies which are educated in understanding the science of urban nature, wildlife and the importance of existing trees, especially larger trees whose contribution is far greater than any monetary compensation.

"Encourage the *preservation* and expansion of the tree canopy throughout the city for the benefit they provide" (written in your plan under section LZU 2.7.) Please share specifics including:

- What specific studies shows planting programs can compensate for the loss of already established larger trees and the increase of hardscape?
- *Name the specific tree advocacy groups and science based studies have been used concerning this subject*

- *What **oversight** will be in place going forward to ensure scientists will lead the SDCI decisions in the approach to tree preservation?*

Thanks!

Helen Pope
Hpope@live.com

Letter 381

From: Janice Price
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 9:29:58 AM

CAUTION: External Email

Comments Planning and Community Development EIS,

Dear city decision-makers,
I am deeply concerned about the lack of attention to QUALITY of life being paid in development plans. Yes, we need more affordable housing, but we also need to have healthy and livable communities.

381-1

These are weaknesses of the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

* It does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
* It does not ANALYZE the probable scale of impact of tree loss or give numbers but instead SPECULATES that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Please consider the following recommendations to mitigate damage to our natural environment:

* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.
Janice Price
Seattle Resident, Concerned Citizen

Janice Price
janicepr@earthlink.net
118 N. 43rd St
Seattle, 98103

From: Jacquie Quarre
To: Holmes, Jim; PCD_CompPlan_EIS; PCD_OneSeattleCompPlan
Cc: Hubner, Michael
Subject: Re: Comment Letter on draft One Seattle Comprehensive Plan Update & DEIS
Date: Monday, May 6, 2024 11:17:56 AM

CAUTION: External Email

Great, thank you very much.

Jacquie

From: Holmes, Jim <Jim.Holmes@seattle.gov>
Date: Monday, May 6, 2024 at 11:05 AM
To: Jacquie Quarre <jacquie@tharsis.land>, PCD_CompPlan_EIS <PCD_CompPlan_EIS@seattle.gov>, PCD_OneSeattleCompPlan <OneSeattleCompPlan@seattle.gov>
Cc: Hubner, Michael <Michael.Hubner@seattle.gov>
Subject: Re: Comment Letter on draft One Seattle Comprehensive Plan Update & DEIS

Yes. Thank you for your comment.

From: Jacquie Quarre <jacquie@tharsis.land>
Sent: Monday, May 6, 2024 11:04 AM
To: PCD_CompPlan_EIS <PCD_CompPlan_EIS@seattle.gov>; PCD_OneSeattleCompPlan <OneSeattleCompPlan@seattle.gov>
Cc: Hubner, Michael <Michael.Hubner@seattle.gov>; Holmes, Jim <Jim.Holmes@seattle.gov>
Subject: Re: Comment Letter on draft One Seattle Comprehensive Plan Update & DEIS

CAUTION: External Email

Good morning,

Just asking for confirmation that you received my comment letter submitted yesterday afternoon. I want to make sure it is included in the record for the DEIS.

Thank you!

Jacquie

Jacquie Quarré
Tharsis Law P.S.
jacquie@tharsis.land
Direct/cell: 425-891-7842

382-1

From: Jacquie Quarre <jacquie@tharsis.land>
Date: Sunday, May 5, 2024 at 4:57 PM
To: PCD_CompPlan_EIS@seattle.gov <PCD_CompPlan_EIS@seattle.gov>, OneSeattleCompPlan@seattle.gov <OneSeattleCompPlan@seattle.gov>
Cc: michael.hubner@seattle.gov <michael.hubner@seattle.gov>, jim.holmes@seattle.gov <jim.holmes@seattle.gov>
Subject: Comment Letter on draft One Seattle Comprehensive Plan Update & DEIS

Hello,

382-1 cont

I sent this email from my personal email address earlier this afternoon by accident. Please use this one instead, my apologies. The attached letter is the same.

Please find attached a comment letter submitted for the draft One Seattle Comprehensive Plan Update and its Draft Environmental Impact Statement.

Please let me know if you have any questions or would like to discuss further.

Thank you.

Jacquie

Jacquie Quarré
Tharsis Law P.S.
jacquie@tharsis.land
Direct/cell: 425-891-7842

Letter 382

May 5, 2024

Tharsis Law P.S.
Jacquie Quarré
425-891-7842
jacquie@tharsis.land

Office of Planning and Community Development
Seattle City Hall
600 4th Ave, 5th Floor
Seattle, WA 98104

VIA EMAIL TO: OneSeattleCompPlan@seattle.gov
PCD_CompPlan_EIS@seattle.gov

Copy to: Michael Hubner
Long Range Planning Manager,
One Seattle Plan Project Manager
michael.hubner@seattle.gov

Jim Holmes
EIS Lead
jim.holmes@seattle.gov

Dear Office of Planning and Community Development:

I represent Elizabeth and Jonathan Roberts, who own a home located next to the E. Harrison Street End on Lake Washington in Seattle. We are writing to provide comment on the draft One Seattle Comprehensive Plan Update policies that relate to Shoreline Street Ends in Seattle, and the Draft Environmental Impact Statement for the One Seattle Comprehensive Plan Update as it relates to those policies.[1]

382-1 cont

In summary, we propose edits (1) to the language of draft P 1.14 to expressly include the need to "restore ecological conditions" that already is included in the current 2035 Comprehensive Plan, and (2) to the glossary definition of Shoreline Street Ends to be inclusive of neighbors to Shoreline Street Ends in the collaboration that occurs around these unique and important spaces. Please see the specific suggestions at pages 3-4 of this letter.

By way of background, the Roberts have lived in a community with multiple Shoreline Street Ends for decades, and in the last 3 years have owned a home next to a Shoreline Street End. Unfortunately, during this time the Roberts have observed deterioration of ecological conditions

[1] *See, e.g.*, Draft EIS at 3.11-28 (Shoreline Master Program Public Access).

of Shoreline Street Ends. For example, a mapped Environmentally Critical Area wetland in the shoreline at the E. Harrison Street End has been trampled and degraded over time, and vegetation is frequently cut back and removed without a plan or consideration for the ecological benefit the vegetation may provide.

There is a strong emphasis in state and federal law on protecting critical areas, including wetlands. The Growth Management Act (Chapter 36.70A RCW), Shoreline Management Act (Chapter 90.58 RCW), and numerous regulations in the Washington Administrative Code require Cities and Counties to protect critical areas. *See, e.g.*, WAC 365-190-080 ("Counties and Cities must protect critical areas."). Additional state and federal laws also regulate wetlands, such as the Water Pollution Control Act (Chapter 90.48 RCW), the State Environmental Policy Act (Chapter 43.21C RCW), and Section 401 of the federal Clean Water Act.

The overall goal for statewide wetland resource management in Washington State, quoted from Executive Order 89-10 is:

> "...to achieve no overall net loss in acreage and function of Washington's remaining wetlands base. It is further the long-term goal to increase the quantity and quality of Washington's wetlands resource base."[2]

The Washington State Department of Ecology also recognizes the importance of wetlands in mitigating climate change: "Wetlands are a key player in global greenhouse gas budgets . . . they are also an important sink for greenhouse gases, where carbon is stored and prevented from entering the atmosphere."[3]

382-1 cont

For Seattle to continue to have healthy shorelines with vegetation and natural features that provide a beautiful environment for the public to enjoy while also supporting wildlife and battling climate change, ecological restoration needs to remain a clear policy for Shoreline Street Ends in the comprehensive plan.

The current Comprehensive Plan (2022 Update) includes two policies specifically addressing Shoreline Street Ends:

- P 1.6: "Provide public access to shorelines by using street ends, regulations, or acquisition."

- SA P10: "Shoreline street ends are a valuable resource for public use, access, and shoreline restoration. Design public or private use or development of street ends to enhance, rather than reduce, public access and to restore the ecological conditions of the shoreline."

[2] *See* https://ecology.wa.gov/water-shorelines/wetlands/tools-resources/wetland-program-plan.
[3] *See* https://ecology.wa.gov/water-shorelines/wetlands/tools-resources/wetlands-climate-change.

The draft One Seattle Comprehensive Plan Update includes the following policy that directly addresses Shoreline Street Ends:

- P 1.14: "Provide sustainable public access to shorelines by improving shoreline street ends, applying shoreline regulations, and acquiring waterfront land."

382-2

In addition to this policy, there are other policies in the draft One Seattle Comprehensive Plan Update that are protective of the shoreline and public safety that would apply to Shoreline Street Ends as public spaces. We generally support the new policies and provide a few suggestions that address protection of the ecological environment against environmental impacts at Shoreline Street Ends:

1. Include Ecological Restoration in P 1.14.

Elements of the last sentence of current SA P10, quoted above, should be added to draft P 1.14 so it reads (additions in bold and underline):

> P 1.14 Provide sustainable public access to shorelines by improving shoreline street ends **to enhance public access while also restoring ecological conditions of the shoreline**, applying shoreline regulations, and acquiring waterfront land.

This proposed edit carries forward the current policy and makes P 1.14 more consistent with other policies in the Comprehensive Plan requiring ecological protection and restoration, for example:

382-1 cont

- SA G10 which "[r]equire[s] that no net loss of ecological functions occurs as a result of uses, development, shoreline modifications, maintenance activities, or expansion of existing uses."
- P G5 which requires that "[p]ublic spaces support a healthy environment and resilient shorelines and mitigate the impacts of climate change."
- LU 17.12 which aims to "[s]eek a net gain in wetland function by enhancing and restoring wetland functions across the city in City projects."

The proposed change is also consistent with the code, Resolution 29370 and Directors Rule 12-2015 that govern Shoreline Street Ends in Seattle, along with Seattle's Shoreline Master Program. It also reflects one of the goals of the most current Shoreline Street Ends Work Plan Update (Oct. 2017), which is to "[e]nhance shoreline habitat by including, where possible, ecological benefits such as native plantings and green stormwater treatment."

2. Be inclusive of neighbors as part of "community partners" who collaborate on Shoreline Street Ends.

The Glossary at page 189 of the draft One Seattle Comprehensive Plan Update defines Shoreline Street Ends as:

> "Shoreline street ends are City Council designated areas for public access and occur where streets meet a shore. Our program collaborates with community partners on maintaining and improving shoreline street ends for public use."

This should be revised as follows to be more inclusive of neighbors of Shoreline Street Ends, who sometimes are not heard in the processes around maintaining and improving Shoreline Street Ends (additions in bold and underline):

> "Shoreline street ends are City Council designated areas for public access and occur where streets meet a shore. Our program collaborates with community partners **including neighbors of shoreline street ends** on maintaining and improving shoreline street ends for public use."

382-2 cont

For some Shoreline Street Ends, community members volunteer as "stewards" and serve as a sort of liaison from community partners such as Friends of Street Ends to the Seattle Department of Transportation. There currently is no manual or formal certification process that governs stewards. In this de facto system of Shoreline Street End stewards, the voices of neighbors of Shoreline Street Ends are often unheard. Accordingly, it is important that when the One Seattle Comprehensive Plan Update mentions collaborating with "community partners", it is clear that community partners include neighbors of Shoreline Street Ends so that all voices are heard in the future maintenance and improvement of Shoreline Street Ends.

Shoreline Street Ends provide incredible opportunities in Seattle for public access alongside ecological restoration and conservation that can make Seattle and its shorelines healthier and more environmentally sustainable for decades to come. The policies related to Shoreline Street Ends in the One Seattle Comprehensive Plan Update should acknowledge the importance of ecological restoration to public access and enjoyment of these spaces. Focusing on improving the ecology of Shoreline Street Ends may help to mitigate many of the environmental impacts that will be felt from increased growth and urbanization of Seattle in the coming decades.

We appreciate your consideration of these changes and look forward to continuing to be involved as the update process moves forward.

Sincerely,

Jacqueline C. Quarré
Tharsis Law P.S.

Letter 383

From: Aleksandra Radmanovic
To: PCD_CompPlan_EIS
Subject: Concerns around proposed changes to zoning West Green Lake
Date: Monday, May 20, 2024 11:18:06 AM

CAUTION: External Email

I'm deeply concerned by the proposal to rezone our neighborhood to allow up 3-6 story buildings along the Green Lake.

Please use C1-55 (M) zoned area along Aurora in West Green Lake for building affordable housing instead of rezoning NR3 neighborhood residential community between Winona and the lake that would devastate our community and displacing neighbors that have lived here for decades.

383-1

Thank you,
Aleksandra Radmanovic
206.261.0269

Letter 384

From: Carlos Rai Trapero
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 11:03:14 AM

CAUTION: External Email

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

384-1

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Carlos Rai Trapero
iqrai.2564@gmail.com
121 15th Ave E 306
Seattle, Washington 98112

Letter 385

From: Linda Ramsdell
To: PCD_CompPlan_EIS
Cc: Moore, Cathy
Subject: Comment on the Seattle Comprehensive Plan/130th Station Rezone Draft EIS
Date: Monday, May 6, 2024 4:59:51 PM

CAUTION: External Email

Thank you for this opportunity to provide comments. I have lived on Corliss Ave North just south of 128th in the triangle area of land of our Haller Lake neighborhood that was rather newly included in what is now designated as an "Urban Center" as this parcel of land is in the walking zone that surrounds the upcoming 130th light rail station. I have lived in this location since 1989 and and anticipate staying in this neighborhood for the next 20-30 plus years.

Our city is experiencing growth and I support managed growth to add housing in our area recognizing that we are in walking distance from the upcoming 130th light rail. We have been seeking attention from the City of Seattle for decades to place sidewalks in our neighborhoods as promised when our area was first annexed by the city. I support a focus of growth between Interstate 5 and Aurora along 130th that will enhance safe walking to grocery stores and amenities. Since Washington State law is impacting re-zoning for all single family neighborhoods I favor a city wide plan that focuses on transportation corridors as noted in Alternative 4. Adding high-rise apartment buildings around neighborhood amenities that could provide single story living for families and for elderly. 385-1

Our neighborhood is surrounded by a wonderful tree canopy that provide energy efficient shade and many already have the designation of being a Tier 1 or heritage tree. Under Alternative 5 the charts shown our neighborhood as being zoned as LR1. I support that level of growth if developers are required to maintain a maximum percentage of healthy, long-living trees.

I understand that specific zoning street by street is still in the planning stages and that the public will have a chance to comment later this Fall about specific zoning recommendations. 385-2

Thank you,

Linda
Linda Ramsdell
12572 Corliss Avenue North
Seattle, WA
98133

Letter 386

From: Carol Rava
To: PCD_CompPlan_EIS
Cc: Morales, Tammy
Subject: comp plan enviro impact statement
Date: Monday, May 6, 2024 11:22:01 AM

CAUTION: External Email

Hi there-
I am concerned that the EIS on the comprehensive plan fails to adequately address key issues related to urban forestry and the city's canopy.

Specifically, in section P3-3 the EIS does not state directly what the impact of the plan will be on Seattle's plants and animals, only that the impacts wouldn't reduce their survival rates in the wild. This is super vague language and should be clarified.

Also in that section, saying that the plan alternatives would not have 'significant unavoidable adverse impacts' on tree cover seems to gloss over real potential problems. What are the adverse impacts it will have? How is significant defined? And what makes this 'unavoidable'? I mean couldn't adverse impacts on the tree canopy absolutely be mitigated by requiring more greenscape vs. hardscape on new developments??

386-1

Finally - the EIS seems to say that the city can still meet it's 30% canopy goal largely through public lands. That is ridiculous - we will have whole swaths of the city with little to no canopy, increasing exposure to climate change impacts, etc. There is surely not enough public land nor would it make sense to foist all of the onus on public lands to count toward the 30% canopy goal. There needs to be provisions to have private lands explicitly have a % contribution goal in this 30%.

Thank you for your consideration.

carol

Letter 387

From: Mireia Ravell Padial
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 6:07:21 AM

CAUTION: External Email

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

387-1

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.
Mireia

Mireia Ravell Padial
mravell@gmail.com
6303 224th St SW
Mountlake Terrace, Washington 98043

Letter 388

From: Mireia Ravell
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 3:13:59 PM

CAUTION: External Email

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

388-1

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.
Mireia R.P.

Mireia Ravell
mravell@gmail.com
6303 224th St SW
Mountlake Terrace , Washington 98043

Letter 389

From: Sarah Reuben
To: PCD_OneSeattleCompPlan; PCD_CompPlan_EIS
Subject: Public Comment on One Seattle Draft Comprehensive Plan Update
Date: Monday, May 20, 2024 2:01:04 PM

CAUTION: External Email

Hello,

My name is Sarah and I live, work, and study in Seattle. I am emailing as I have many concerns with the Draft One Seattle Plan and call upon you to embrace a plan that allows for greater abundance and diversity of housing.

The Draft Plan does not plan for enough housing, keeping housing production below expected growth. The Draft Plan also does not allow for family-sized homes in middle housing. Restrictive size limits will limit the growth of family-sized homes in middle housing, which will continue to push families out of Seattle.

389-1

Instead of the Draft Plan that preserves the status quo and makes Seattle even more expensive, embrace housing abundance that will better meet Seattle's needs as a growing world-class city. This includes, but is not limited to:

- Allow bigger buildings in more places.
- Follow the spirit of HB 1110 to allow more middle housing to actually get built. Match or exceed state floor area minimums, setting FAR at at least 1.2 for fourplexes and 1.6 for sixplexes instead of a measly 0.9 across the board.
- Embrace transit-oriented development.
- Make Seattle a truly accessible and climate-conscious city by improving access to transit, identifying gaps in transit and work towards filling those gaps, and building infrastructure for safe active transportation like walking and biking.
- Allow more growth in low-displacement areas.
- Embrace mixed-use zoning so we can actually become a 15-minute city. Add more "neighborhood centers" and allow for corner stores on more than just corners.

I love Seattle, but without significant change, I may not be able to afford living here in the future. As a renter, I've experienced firsthand how expensive Seattle's housing market is, and without a financial windfall or zoning and market reform, I doubt I will ever be able to own a home in Seattle. More generally, as a Seattle resident, I see homelessness every day. Knowing that the 2024 point-in-time count shows a 24% increase in homelessness from 2022, and knowing that homelessness is tied to housing affordability, Seattle must embrace affordability through abundance if we wish to keep more of our unhoused neighbors off the streets and prevent displacement of underprivileged communities.

The Draft Plan maintains the status quo and will make Seattle more expensive -- increasing rent burdens, making homeownership less accessible, and driving displacement. We cannot afford a Plan that does not adequately address our housing crisis. Please change the Comprehensive Plan to reflect the needs of Seattle and make it a better, more affordable, more accessible, and more climate-conscious city.

Sincerely,
Sarah Reuben

Letter 390

From: Mickey Riley
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 9:22:07 AM

CAUTION: External Email

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

390-1

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
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Mitigation recommendations:

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* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

PLEASE KEEP WHAT IS LEFT OF “THE CITY” GREEN” !
Thank you for your consideration.

Mickey Riley
mickeyriley40@gmail.com
5006 37 Ave NE
Seattle , Washington 98105

Letter 391

From: Susan Robb
To: PCD_CompPlan_EIS; LEG_CouncilMembers
Subject: Comment on DEIS
Date: Sunday, May 12, 2024 9:42:40 AM
Attachments: 41598_2024_56968_Fig1_HTML.png
apha_favicon.png

CAUTION: External Email

Dear Seattle City Council and Comprehensive Plan Drafters,

As you are most likely aware, daily access to urban green spaces (UGS) increases physical and mental well-being. Lack of access has the greatest impact on underserved populations, who are already impacted by the effects of economic, minority, and environmental stressors.

Additionally, urban green spaces will be increasingly important for us all as climate change worsens.

391-1

Seattle should be making a concerted effort to increase UGS and ensure that historically disenfranchised populations are experiencing an equal percentage of UGS and aren't being asked to travel to benefit from them.

With these issues in mind, I have comments about the proposed comprehensive plan.

Please note my comment on the DEIS:

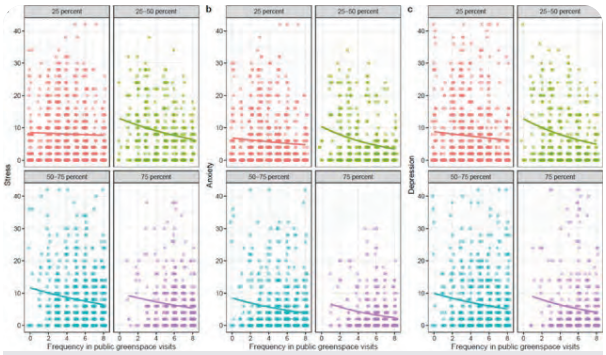
1: Section P 3-3 states that “none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild.” What is the impact of the plan specifically on Seattle’s plants and animals?

2: Section P 3-3 states that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." What analysis shows that tree planting programs, coupled with increased hardscape, will compensate for lost urban forest?

3: The plan states that Seattle will make progress toward its 30% canopy goal. The new tree ordinance substantially reduces private land available for trees. How much public land is available to reach the 30% goal? How many trees will need to be planted in these areas every year to make up for trees removed by development?

Sincerely,
Susan Robb

Nature and mental health: An ecosystem service perspective
science.org



A lower connection to nature is related to lower mental health benefits from nature contact - Scientific Reports
nature.com

Improving Health and Wellness through Access to Nature
apha.org

sciencedirect.com

391-1 cont

Letter 392

May 5, 2024

Tharsis Law P.S.
Jacquie Quarré
425-891-7842
jacquie@tharsis.land

Office of Planning and Community Development
Seattle City Hall
600 4th Ave, 5th Floor
Seattle, WA 98104

VIA EMAIL TO: OneSeattleCompPlan@seattle.gov
PCD_CompPlan_EIS@seattle.gov

Copy to: Michael Hubner
Long Range Planning Manager,
One Seattle Plan Project Manager
michael.hubner@seattle.gov

Jim Holmes
EIS Lead
jim.holmes@seattle.gov

Dear Office of Planning and Community Development:

I represent Elizabeth and Jonathan Roberts, who own a home located next to the E. Harrison Street End on Lake Washington in Seattle. We are writing to provide comment on the draft One Seattle Comprehensive Plan Update policies that relate to Shoreline Street Ends in Seattle, and the Draft Environmental Impact Statement for the One Seattle Comprehensive Plan Update as it relates to those policies.[1]

392-1

In summary, we propose edits (1) to the language of draft P 1.14 to expressly include the need to "restore ecological conditions" that already is included in the current 2035 Comprehensive Plan, and (2) to the glossary definition of Shoreline Street Ends to be inclusive of neighbors to Shoreline Street Ends in the collaboration that occurs around these unique and important spaces. Please see the specific suggestions at pages 3-4 of this letter.

By way of background, the Roberts have lived in a community with multiple Shoreline Street Ends for decades, and in the last 3 years have owned a home next to a Shoreline Street End. Unfortunately, during this time the Roberts have observed deterioration of ecological conditions

[1] *See, e.g.*, Draft EIS at 3.11-28 (Shoreline Master Program Public Access).

of Shoreline Street Ends. For example, a mapped Environmentally Critical Area wetland in the shoreline at the E. Harrison Street End has been trampled and degraded over time, and vegetation is frequently cut back and removed without a plan or consideration for the ecological benefit the vegetation may provide.

There is a strong emphasis in state and federal law on protecting critical areas, including wetlands. The Growth Management Act (Chapter 36.70A RCW), Shoreline Management Act (Chapter 90.58 RCW), and numerous regulations in the Washington Administrative Code require Cities and Counties to protect critical areas. *See, e.g.*, WAC 365-190-080 ("Counties and Cities must protect critical areas."). Additional state and federal laws also regulate wetlands, such as the Water Pollution Control Act (Chapter 90.48 RCW), the State Environmental Policy Act (Chapter 43.21C RCW), and Section 401 of the federal Clean Water Act.

392-1 cont

The overall goal for statewide wetland resource management in Washington State, quoted from Executive Order 89-10 is:

> "...to achieve no overall net loss in acreage and function of Washington's remaining wetlands base. It is further the long-term goal to increase the quantity and quality of Washington's wetlands resource base."[2]

The Washington State Department of Ecology also recognizes the importance of wetlands in mitigating climate change: "Wetlands are a key player in global greenhouse gas budgets . . . they are also an important sink for greenhouse gases, where carbon is stored and prevented from entering the atmosphere."[3]

For Seattle to continue to have healthy shorelines with vegetation and natural features that provide a beautiful environment for the public to enjoy while also supporting wildlife and battling climate change, ecological restoration needs to remain a clear policy for Shoreline Street Ends in the comprehensive plan.

The current Comprehensive Plan (2022 Update) includes two policies specifically addressing Shoreline Street Ends:

- P 1.6: "Provide public access to shorelines by using street ends, regulations, or acquisition."

- SA P10: "Shoreline street ends are a valuable resource for public use, access, and shoreline restoration. Design public or private use or development of street ends to enhance, rather than reduce, public access and to restore the ecological conditions of the shoreline."

[2] *See* https://ecology.wa.gov/water-shorelines/wetlands/tools-resources/wetland-program-plan.
[3] *See* https://ecology.wa.gov/water-shorelines/wetlands/tools-resources/wetlands-climate-change.

The draft One Seattle Comprehensive Plan Update includes the following policy that directly addresses Shoreline Street Ends:

- P 1.14: "Provide sustainable public access to shorelines by improving shoreline street ends, applying shoreline regulations, and acquiring waterfront land."

In addition to this policy, there are other policies in the draft One Seattle Comprehensive Plan Update that are protective of the shoreline and public safety that would apply to Shoreline Street Ends as public spaces. We generally support the new policies and provide a few suggestions that address protection of the ecological environment against environmental impacts at Shoreline Street Ends: 392-1 cont

1. Include Ecological Restoration in P 1.14.

Elements of the last sentence of current SA P10, quoted above, should be added to draft P 1.14 so it reads (additions in bold and underline):

> P 1.14 Provide sustainable public access to shorelines by improving shoreline street ends **to enhance public access while also restoring ecological conditions of the shoreline**, applying shoreline regulations, and acquiring waterfront land.

This proposed edit carries forward the current policy and makes P 1.14 more consistent with other policies in the Comprehensive Plan requiring ecological protection and restoration, for example:

- SA G10 which "[r]equire[s] that no net loss of ecological functions occurs as a result of uses, development, shoreline modifications, maintenance activities, or expansion of existing uses."

- P G5 which requires that "[p]ublic spaces support a healthy environment and resilient shorelines and mitigate the impacts of climate change."

- LU 17.12 which aims to "[s]eek a net gain in wetland function by enhancing and restoring wetland functions across the city in City projects."

The proposed change is also consistent with the code, Resolution 29370 and Directors Rule 12-2015 that govern Shoreline Street Ends in Seattle, along with Seattle's Shoreline Master Program. It also reflects one of the goals of the most current Shoreline Street Ends Work Plan Update (Oct. 2017), which is to "[e]nhance shoreline habitat by including, where possible, ecological benefits such as native plantings and green stormwater treatment."

2. Be inclusive of neighbors as part of "community partners" who collaborate on Shoreline Street Ends.

The Glossary at page 189 of the draft One Seattle Comprehensive Plan Update defines Shoreline Street Ends as:

> "Shoreline street ends are City Council designated areas for public access and occur where streets meet a shore. Our program collaborates with community partners on maintaining and improving shoreline street ends for public use."

This should be revised as follows to be more inclusive of neighbors of Shoreline Street Ends, who sometimes are not heard in the processes around maintaining and improving Shoreline Street Ends (additions in bold and underline):

392-1 cont

> "Shoreline street ends are City Council designated areas for public access and occur where streets meet a shore. Our program collaborates with community partners **including neighbors of shoreline street ends** on maintaining and improving shoreline street ends for public use."

For some Shoreline Street Ends, community members volunteer as "stewards" and serve as a sort of liaison from community partners such as Friends of Street Ends to the Seattle Department of Transportation. There currently is no manual or formal certification process that governs stewards. In this de facto system of Shoreline Street End stewards, the voices of neighbors of Shoreline Street Ends are often unheard. Accordingly, it is important that when the One Seattle Comprehensive Plan Update mentions collaborating with "community partners", it is clear that community partners include neighbors of Shoreline Street Ends so that all voices are heard in the future maintenance and improvement of Shoreline Street Ends.

Shoreline Street Ends provide incredible opportunities in Seattle for public access alongside ecological restoration and conservation that can make Seattle and its shorelines healthier and more environmentally sustainable for decades to come. The policies related to Shoreline Street Ends in the One Seattle Comprehensive Plan Update should acknowledge the importance of ecological restoration to public access and enjoyment of these spaces. Focusing on improving the ecology of Shoreline Street Ends may help to mitigate many of the environmental impacts that will be felt from increased growth and urbanization of Seattle in the coming decades.

We appreciate your consideration of these changes and look forward to continuing to be involved as the update process moves forward.

Sincerely,

Jacqueline C. Quarré
Tharsis Law P.S.

DEIS StoryMap Comment

Name: Janet Robinson

Email: janetrobinson65@gmail.com

Date: 5/6/2024

Comment:

I am a property and business owner at 12303 15th Ave NE. I am very excited about the prospect of changing the zoning in the 130th & 145th Street Station Area. Especially Alternatives 2 and 5.
I think that allowing for higher elevations of townhomes, apartment buildings, and mixed use buildings with fewer requirements for parking will make for more vibrant and walkable streets. We need more density in this part of Seattle. We need more living units as well as room for small businesses. The light rail station will allow for easy commuting into downtown Seattle and so more working families will want to live close to the station. And the more services that are provided within walking distance, the more appealing this neighborhood will be. Fewer parking lots will make the area appeal to more people.

393-1

Letter 394

From: Jason Rock
To: PCD_CompPlan_EIS
Subject: Bring back the Abundance Map
Date: Monday, May 6, 2024 8:51:39 AM

CAUTION: External Email

It's clear that this process has been political, as we move forward with this process we need to bring back the planner proposed Abundance Map that begins to meet the needs of our growing city instead of the politically motivated options presented by the mayor's office that would double down on the mistakes of the past.

394-1

Letter 395

From: Anne Roda
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 9:32:11 AM

CAUTION: External Email

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

395-1

Mitigation recommendations:

* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Anne Roda
imanneroda@gmail.com
1941 Gilman Dr W Lowr
Seattle, Washington 98119

Letter 396

From: carrie root
To: PCD_CompPlan_EIS
Cc: Moore, Cathy
Subject: Questions regarding the Comprehensive Plan"s environmental statement
Date: Monday, May 6, 2024 3:25:22 PM

CAUTION: External Email

There are some parts of the Comprehensive Plan's environmental statement that I believe need to be clarified:

- Seattle has a goal of 30% tree canopy. I trust that there has been analyses of how much public land is available to be used to replace trees removed by development on private land. Is there a concrete plan to ensure that these trees will be planted in a timely fashion?

396-1

- In the same vein, I would like to see documentation that the alternatives put forth in the Comprehensive plans will not have "significant, unavoidable adverse impacts on tree canopy cover", nor will they "reduce the likelihood of survival or recovery of a plant or animal species in the wild". Those are pleasant sentiments, but we need to have supported analysis of what the impacts on trees and wildlife are expected to be, and that the proposed tree planting programs will compensate for the lost urban forest and associated increased hardscape.

Regards,

Carol Root
11032 30th Ave NE, Seattle, 98125
206-499-3962

Letter 397

From: Keith Roraback
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Saturday, May 18, 2024 6:50:48 PM

CAUTION: External Email

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS). 397-1

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Keith Roraback
kroraback@me.com
4327 NE 45th St
Seattle, Washington 98105-5139

Letter 398

From: Cynthia ROSE
To: PCD_CompPlan_EIS
Subject: One Seattle Plan response
Date: Monday, May 6, 2024 12:18:07 AM

CAUTION: External Email

I am in favor of alternative 2 or 4 for future housing plans for Seattle as there is more possibility in these alternatives for the city to try to maintain a tree canopy in order to help our environment Seattle while providing additional housing.

I also believe that the TREE PROTECTION ORDINANCE SHOULD BE AMENDED TO MAXIMIZE RETENTION OF EXISTING TREES 6""DSH AND LARGER, AND THAT THE SCCI DIRECTOR SHOULD BE GIVEN the ability to ask for alternative site designs to maximize the retention of trees. 398-1

I am wondering what impact there will be on the plants and animals in each of the alternatives.

Sincerely yours,

Cynthia Rose, 11557 23rd Ave Ne, Seattle , Wa. 98125

Letter 399

From: Hannah Rosentreter
To: PCD_CompPlan_EIS
Subject: Bring back the OPCD Abundance Plan
Date: Saturday, May 18, 2024 9:16:42 AM

CAUTION: External Email

Hello,

I am in favor of the OPCD Abundance plan and reject Mayor Harrell's current plan that has significantly reduced the amount of planned housing in Seattle's comprehensive plan.

The OPCD Abundance Plan showcases a future with transit-oriented development that helps create desperately needed housing along natural corridors that will help make our city more accessible, walkable, and enjoyable. This is the future Seattle needs to be working toward. Mayor Harrell's proposal falls short and removes critical opportunities for development of neighborhood centers. 399-1

Please bring back the OPCD Abundance Map!!!

Thank you for your time,
Hannah
--
Hannah Rosentreter
(she/her)
UX Portfolio: https://hannahrosentreter.com
715-338-9517 | hannahrosentreter@gmail.com
LinkedIn | Instagram

Letter 400

From: Carolyn Rubenkonig
To: PCD_CompPlan_EIS; LEG_CouncilMembers
Subject: Comment on DEIS - comprehensive plan
Date: Monday, May 6, 2024 10:34:44 AM

CAUTION: External Email

Please note my comment on the DEIS:

1: Section P 3-3 states that “none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild.” What is the impact of the plan specifically on Seattle’s plants and animals?

2: Section P 3-3 states that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." What analysis shows that tree planting programs, coupled with increased hardscape, will compensate for urban forest loss?

400-1

3: The plan states that Seattle will make progress toward its 30% canopy goal. The new tree ordinance substantially reduces private land available for trees. How much public land is available to reach the 30% goal? How many trees will need to be planted in these areas every year to make up for trees removed by development? Why are we even considering removing mature trees already doing fine work of ecosystem services? Services that any young replacement tree cannot possibly replicate any time soon, if at all, given how climate change is making it harder to establish new plantings.

Mature trees and pocket forests are doing so much for us- millions of dollars in ecosystem services like cleaning and storing water, reducing erosion, cooling and shading, providing habitat, and more. We should be prioritizing saving and honoring these trees already doing the work. They cannot be replaced.

Sincerely,

Carolyn Rubenkonig

Letter 401

From: Catherine Ruha
To: PCD_CompPlan_EIS
Subject: One Seattle Comments
Date: Saturday, May 4, 2024 11:19:21 AM

CAUTION: External Email

Dear City of Seattle,
Concerning the One Seattle Plan:

As I look over my notes from waking at 2:00 am and from the virtual meeting I attended on May 2, 2024 this is what comes up:

Climate Change Resilience and Displacement concerns and cutting costs on the lower class and poor: 401-1

- Energy efficient construction is needed for all these new homes in whatever form they will take. Social Housing is focused on this. I support Social Housing for its commitment to energy efficiency and to paying no more than 30% of your income.
- Walkable neighborhoods to healthy food and pharmaceuticals. I think more City encouragement/rezoning to putting close access to necessities is important.
- Not so excited by large apartment buildings along neighborhood streets – smaller multi-family units feel more neighborly and also more able to keep access to nature – trees and places for gardens.

What makes walking pleasurable and desirable? Find places to change focus on car culture to focus on walking/biking/human culture:

- Decrease hardscape and increase trees and other vegetation. More trees and rain gardens along easements.
- Encourage homeowners to plant drought tolerant, native and near native trees and other plants as well as creating rain gardens. (via water utility bills and City could lead by example)
- More crosswalks with islands and walk lights. Again, refocus on walking/biking/human oriented culture and away from car culture.

New housing and sense of community - built to encourage interaction – community garden space incorporated into?

Also:

- P 3-3-29-30 Please analyze the potential impact of the 5 options on Seattle plants and animals. This is a Seattle EIS, not a regional or state EIS. Saying "unlikely to result in appreciable impacts on regional populations of plants or animals"' and

"none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild" is avoiding commenting on the specific impacts on Seattle plants and animals.

- p 3-3-30 Saying that "none of the action alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." is not backed up by facts but speculative at best. The new tree protection ordinance actually increases the potential for tree removal in several ways. One is that all the developmental areas covered by the ordinance state that the newly defined "basic tree protection area cannot be modified" despite Portland, Oregon and the Northwest Society of Arboriculture saying it can be modified to save trees. This and current lot coverage of 85 - 100% for multifamily lots and above and rezoning to occur means more trees, especially large ones, will be removed. What is your estimation of potential canopy acreage loss (over 5 year periods consistent with the city's canopy studies) with increased development density in each alternative?
- What is your estimation of planting needs and time frame to replace the lost canopy (over 5 year periods tracked by the city's canopy study)?
- Is canopy replacement equivalence even possible with replanting since removed trees, if not removed, would have increased growing according to scientific articles?

401-1 cont

Thank you! Much has gone into this. Please continue to be thoughtful and respectful to communities on this and to what remains of the natural world in Seattle. Seattle used to be the Emerald City, let's not lose this and make sure the beautiful green plants are expanded into poorer areas. And, more small parks – for Forest Bathing ☺

Catherine Ruha
1541 NE 91st Street
Seattle, WA 98115

Letter 402

From: Moani Russell
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 11:07:31 AM

CAUTION: External Email

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

402-1

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Moani Russell
moanirussell@gmail.com
7526 39TH AVE NE
Seattle, Washington 98115

Letter 403

From: Hayk
To: PCD_CompPlan_EIS
Subject: Comprehensive Plan Feedback
Date: Monday, May 20, 2024 8:46:12 PM

CAUTION: External Email

I support the original abundance map, allowing for 10,000+ new dwelling units a year, 44+ neighborhood centers, and more. Thoughtful upzoning/density and housing will decrease housing cost, traffic, and pollution. I support what Complete Communities Coalition is advocating.
- Hayk Saakian

403-1

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Letter 404

May 6, 2024

VIA Email
PCD_CompPlan_EIS@seattle.gov

RE: DEIS Comment Letter (RSL-Zoned Property between Union and E Pine St.)

404-1

Dear Mr. Holmes:

Background: A common critique is that the draft Comprehensive Plan and its associated draft environmental impact statement (DEIS) does not go far enough to generate housing to adequately address Seattle's housing crisis while appropriately balancing displacement concerns that the City acknowledges is difficult to quantify and measure.

Requests: As a City resident and property owner, I strongly encourage the City to be more bold to address the housing crisis and enact the following:

- Create a preferred alternative that increases housing potential for RSL-zoned land **between Union and E Pine St**.
- Enact a specific land use policy that encourages rezoning this property from RSL to LR1, LR2, or LR3:

  Proposed LU 1.7.1: Rezone areas currently zoned RSL to an appropriate LR zone for land between Union and E. Pine St. located in the 23rd and Union-Jackson Residential Urban Center.

This approach advances the City's housing goals and continues to address the City's displacement concerns.

404-2

I also request that the City's FEIS include an analysis of the trade-offs between the draft anti-displacement strategies and the quantifiable need to generate more housing. Specifically, I request that the City analyze the amount of additional housing that could be generated under the following scenarios:

1. if all RSL-zoned land in Centers was rezoned to LR regardless of displacement risk;
2. if all RSL-zoned land in Centers that is not a high-displacement risk was rezoned to LR;
3. if all RSL-zoned land in Centers that is only low-displacement risk was rezoned to LR; and
4. if none of the RSL-zoned land in Center was rezoned to LR (no action). For the no action alternative, identify the number of homes that would likely be demolished or renovated to create luxury homes and still result in displacement.

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404-2 cont

This data would help the City weigh the pros and cons of its draft plan to limit RSL to LR rezones in Centers only with low-displacement risk.[1]

Background Information:

- RSL-zoned land between Union and E. Pine St. is located in the 23rd and Union-Jackson Residential Urban Center. This area is attractive: walking distance to Capitol Hill, Central District, and Madrona/Leschi.

- As we've repeatedly seen, high-income individuals purchase existing homes in this area, demolish or substantially renovate the homes, and build new luxury single family homes in the exact area where the City desires to encourage new housing and discourage displacement. The displacement risk is already here and real.

City Displacement Analysis:

- Comp Plan materials state that "market pressures … drive displacement."[2] The DEIS shares a similar sentiment with supplemental information. [3]

- The City is attempting to balance encouraging housing production and discouraging displacement. To this end, the City's broad approach currently contemplates rezones from RSL to LR ***only*** for areas within existing centers that are zoned Residential Small Lot **and** are in areas of **low-displacement risk**. The RSL-zoned land between Union and Pine St. is not low-displacement risk. Thus, the City is poised to miss an opportunity to provide additional housing here.

- The City's draft documents understandably use a broad brush, and one purpose of public comment is to inform City Staff of the realities on the ground.

- ***For this unique area***, the City's draft approach will, ironically, exacerbate displacement and restrict new housing. Again, the practice of creating luxury homes in under-zoned property is commonplace between Union and Pine St in this Urban Center.

- The DEIS and associated draft Comp Plan presume that "market pressures" and associated displacement will be lower if the area is not rezoned to LR. This presumption is not accurate in this particular neighborhood.[4]

---

[1] Updating Seattle's Neighborhood Residential Zones (March 2024) ("We propose to remove RSL as a zoning category. Areas currently zoned RSL **with low risk of displacement** or within a half mile of a light rail station would be rezoned to Lowrise 1 (LR1), a multifamily zone that allows a similar number of units but more floor area. Areas zoned RSL located elsewhere would be rezoned to one of the updated Neighborhood Residential zones.") (emphasis added).

[2] One Seattle Plan Anti-Displacement Framework, p. 4.

[3] DEIS, Ch 3.8-22-30.

[4] The DEIS does not quantify the displacement impact of single-family home development / substantial alterations on under-zoned property. The cited TRAO data does not provide relevant information on this point.

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- Rezoning this area from RSL to LR would create more housing and generate more funding for affordable housing through MHA. The DEIS notes that MHA is an identified mitigation measure for displacement. Rezoning would also discourage displacement from converting existing housing stock to luxury homes.

404-2 cont

Comprehensive Policy: The requested policy is consistent with draft Policy LU 1.7, although we would encourage the City to refine its analysis to understand the trade-offs of the need for housing while enacting sensible anti-displacement strategies. We also encourage the City to enact a specific Comprehensive Plan policy for this unique area:

> Proposed LU 1.7.1: Rezone property currently zoned RSL to an appropriate LR zone for land between Union and E. Pine St. located in the 23rd and Union-Jackson Residential Urban Center.

Thank you for your consideration.

Sincerely,

Kevin Saliba

DocuSigned by:
Kevin Saliba
8771E730239047C...

Letter 405

From: Barbara Sanborn
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 2:05:19 PM

CAUTION: External Email

Comments Planning and Community Development EIS,

405-1

Please consider the following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration,
Barbara Sanborn
Seattle, WA 98105

Barbara Sanborn
sanbornbarbara@gmail.com
5038B Sand Point Way NE
Seattle, Washington 98105

Letter 406

DEIS StoryMap Comment

Name: Saunatina Sanchez

Email: saunatina@proton.me

Date: 4/26/2024

Comment:

Corner stores throughout Neighborhood Residential areas is one of the best changes we can make to the city. Having small stores throughout neighborhoods will help bring neighbors together and help with safety by adding eyes on the street.

The Draft One Seattle Plan contemplates an average annual housing production rate of 5,000 homes over the next 20 years. This is significantly lower than the 6,800 to 12,500 homes that Seattle has actually built per year since 2015—which itself has been insufficient to keep up with job growth and demand.

406-1

Simply put, the current Draft Plan is a plan to make Seattle more expensive. This will most impact renters, low-income people, and people of color, as we face rising rents and displacement pressures. This is a step back in our efforts to meet the growing demand for housing.

Allow midrise housing (4-8 stories) and mixed uses in all residential areas within walking distance of frequent transit. Allow middle housing like triplexes, fourplexes, sixplexes, townhouses, and stacked flats throughout all residential areas. Enlarge the proposed Neighborhood Centers, from 800-ft to ¼ mile. Reintroduce Neighborhood Centers that were studied but not included in the Draft Plan. Allow the development of cross-laminated timber highrise buildings in Regional and Urban Centers.

I support the following features of the Draft Plan: Expanding Urban Center boundaries and creating a new Urban Center at 130th Street, Designating Ballard as a new Regional Center, Removing parking minimum requirements near transit and considering a citywide removal, Policy to support community-based developers working to help BIPOC homeowners avoid displacement, Allowing corner stores throughout Neighborhood Residential areas.

406-2

Letter 407

From: Brent Silver
To: PCD_CompPlan_EIS
Subject: Comp Plan Update
Date: Thursday, March 7, 2024 4:08:25 PM

CAUTION: External Email

Dear Seattle Officials,

Please consider the following to beef-up this weak Comp Plan

- Apartments allowed on ALL arterials with 10 minute or better bus service. The higher allowed the better. Perhaps the maximum height (7 floors) directly on them and 3/4 story not on the arterial but within the 800 feet distance.

-Apartments on all corner lots that are 50% larger than the underlying zoning. So 7500sqft minimum to qualify in typical 5000 sqft lot zoning.

-Look into those 6 & 8 pack flats for some areas. Just building townhomes will not get us to where we need to be. However if you plan to rely on townhomes so much you must increase apartments. See first point regarding that. 407-1

-The FAR has to be improved. Anything under 1 is pointless. Mid to high 1s at a minimum please in some areas.

Thank you,

Laura Sanders

Letter 408

From: Hope Sanford
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 9:48:43 AM

CAUTION: External Email

Comments Planning and Community Development EIS,

These are my comments regarding the One Seattle Plan draft Environmental Imact Statement:
Most importantly, the draft EIS does not address saving the 6 inch and larger diameter trees we have. We need large trees for shade during our new, hot summers, and for the CO2 capture they provide for us all. A sapling planted to replace an old growth tree does not provide these for many years, and may not survive. A sapling has to be watered deeply at least once a week during our new summers for at least 5 years.
The EIS draft is mighty vague about the actual projected tree loss, gives no numbers, and simply guesses, conveniently, that there won't be adverse impact on Seattle's tree canopy. Their guess is disingenous- the tree canopy loss under this plan will be extreme. Seattle will no longer be the Emerald City.
Under the current Tree "protection" ordinance, SDCI approves the removal of every single tree a developer wants to remove for any reason, regardless of size. If this is not changed, the impact on Seattle's tree canopy under the One Seattle Plan will be disastrous. Expect heat islands, worsening air quality and hotter summers. Developers will continue to rake in $$$$$ and Seattle residents will suffer.
Thank you for considering my input, Hope Sanford

408-1

Hope Sanford
Hopesnopes@gmail.com
3230 NE 91st St
Seattle, Washington 98115

Letter 409

From: Lindsey Sargent
To: PCD_CompPlan_EIS
Subject: Comments on the comp plan
Date: Thursday, April 11, 2024 8:06:08 PM

CAUTION: External Email

Hello!

I'm not sure if this is the best place to send comments? I tried to join tonight but couldn't get into the meeting and the link in the calendar invite as broken as well :(

My husband and I live along 145th. We've been going to the meetings for several years now and we were disappointed to see the plan released with the potential rezone around the 145th street station removed. 145th is a busy connector, and Shoreline has really stepped up with some great taller projects (6-7 stories) already underway. We would love to see the same happening on our side of the street. Seattle desperately needs more housing, especially close to light rail and upzoning along these busier arterials and close to transportation makes great sense. Our neighborhood would love to see first story retail- 3rd spaces, coffee shops, a local market, day care and small businesses walkable to our neighborhood. 409-1

Please let me know if there is somewhere else I should go to submit comments. I would love to be involved if you have meetings coming up in the future.

Thank you,

Lindsey Sargent
2219 n 145th street Seattle

DEIS StoryMap Comment

Name: Eleanor Saxton

Email: archivistellie@gmail.com

Date: 5/6/2024

Comment:

The city should study the impacts of citywide elimination of parking minimums, expanded highrise zoning within a half mile of all light rail stations, parks, and grocery stores, and floor area ratio bonuses that incentivize stacked flat development rather than attached or detached townhomes. Of the available alternatives, I strongly prefer Alternative 5 with higher growth targets.

410-1

Letter 411

From: Susan Scanlon
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 8:32:03 AM

CAUTION: External Email

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

411-1

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Susan Scanlon
scanlons4@comcast.net
8021 11th Ave NW
Seattle, Washington 98117

DEIS StoryMap Comment

Name: Jennifer Scarlett

Email: trentjen@yahoo.com

Date: 5/6/2024

Comment:

There is not a clear enough definition of affordability levels. I'm aware our greatest need is for very low income housing, please explain what "affordability at all levels" actually means.

412-1

DEIS StoryMap Comment

Name: Jennifer Scarlett

Email: trentjen@yahoo.com

Date: 5/6/2024

Comment:

Resolution #31870 was signed along with the last upzones, (MHA). This was the resolution to study whether or not South Park for the designation criteria as an Urban Village. This study was never done, and now South Park will be upzoned again. Why was the promised study not done ? A large portion of South Park is in ECAs, and the area is remotely located, geographically isolated, and surrounded by industrial zoning, not residential as other urban centers are. Why are we still designated as something South Park has never been? When will South Park be planned using the most recent studies and best info?, (not assumptions or "visioning")

413-1

DEIS StoryMap Comment

Name: Jennifer Scarlett

Email: trentjen@yahoo.com

Date: 5/6/2024

Comment:

South Park does not fit the Urban Center guidelines. Why is South Park designated an Urban Center?

414-1

DEIS StoryMap Comment

Name: Jennifer Scarlett

Email: trentjen@yahoo.com

Date: 5/6/2024

Comment:

Why was residential small lot applied to 2500 sq ft lots in South Park? Other areas of the city were 5,000 sq ft,. Did the city planners overlook the historic 2500 sf lots in South Park? Developers are adding much more lot coverage than is allowed, and we are losing trees fast. Is this mistake fixed in the One Seattle plan?

415-1

Letter 416

From: Jennifer Scarlett
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 11:53:08 AM

CAUTION: External Email

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

416-1

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
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Mitigation recommendations:

* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Jennifer Scarlett
trentjen@yahoo.com
1045 S SULLIVAN ST
SEATTLE, Washington 98108

Letter 417

From: Estelle Schiefer
To: PCD_CompPlan_EIS
Cc: Rivera, Maritza
Subject: EIS Question
Date: Monday, May 6, 2024 4:41:07 PM

CAUTION: External Email

Hello,

Can you please explain to me in detail how you plan to maintain our current tree canopy while carrying out the comprehensive plan? If a bunch of big trees are going to be cut down, how can little twig trees be a suitable replacement? 417-1

Thank you,

Stella Schiefer
Age 15
Wedgwood, Seattle

From: Hans Schiefer
To: PCD_CompPlan_EIS
Cc: Rivera, Maritza
Subject: question
Date: Monday, May 6, 2024 4:51:24 PM

CAUTION: External Email

Hello,
I have a question about the proposed comp plan. How will the comp plan increase tree canopy in frontline communities where people have more asthma and need cleaner air?
-Hans Schiefer wedgwood neighborhood of seattle

418-1

Letter 419

From:	Delia Scholes
To:	PCD_CompPlan_EIS
Cc:	Morales, Tammy
Subject:	Comment on draft EIS for One Seattle Comprehensive Plan
Date:	Monday, May 6, 2024 10:46:17 AM

CAUTION: External Email

Thank you for the opportunity to comment on the Plan and the draft EIS statement.

419-1

The EIS seems to say at several points that urban nature will likely need to be sacrificed to our housing needs. The housing vs trees (and other urban nature) type of thinking is absolutely a false dichotomy. The immediate thought when this language appears is that the document is in service to real estate or other vested interests that would find it simpler to go for the wholesale removal of many aspects of our urban nature and a pretense of replacing it later.

For example, Section P3-3 talks about how the alternatives under review will not impact plant or animal species in the wild. One question arising here is how will the plan impact our own urban plants and animals—with specific data? The omission is concerning. Please talk directly about how urban nature will be protected. It is essential for climate change protection and equitable treatment of our citizens.

The same section (P3-3) has a general statement that the alternatives would not be expected to have adverse impacts on tree canopy cover. A second question is how will this come about? If this is to be through tree planting after the removal of larger trees that are part of the current canopy, this is not in any way equivalent or acceptable. Given the current tree ordinance, which will diminish the private land available for trees and increase hardscape throughout the city, there need to be more specifics on how the tree current canopy will be preserved—and expanded. (We are currently losing canopy and are not progressing toward the 30% goal. Where I live, on Beacon Hill, we are not close to the 30% goal.)

I understand that all of the 5 alternatives will achieve approximately the same amount of housing.
Are any of the 5 alternatives more oriented toward preserving urban nature? If so, this should be noted as an asset of that alternative.

Thank you for your work and for your consideration of citizen comments,

Delia Scholes
Beacon Hill 98108

From: Jennifer Schubert
To: PCD_CompPlan_EIS
Subject: Greenlake rezoning community input
Date: Monday, May 20, 2024 2:41:07 PM

CAUTION: External Email

I live at 7426 Keen Way North. I purchased my home as a fixer-upper in 2020. I have worked very hard to improve it over the years. I have raised my son here and hope to spend the rest of my life here. My home is my primary investment.

420-1

This plan to re-zone my neighborhood for 6-story apartment buildings and condos would change it beyond recognition.

There is no infrastructure here to support such a drastic increase in density. Parking is already very tight, access is difficult, and congestion is a constant and growing problem.

Worse, high-rises filled with large numbers of short-term residents would transform a cozy urban neighborhood of old family homes and modest yards to a place much less safe and much more crowded. These looming commercial structures will block light and air and commandeer the open space.

A sprawling corridor of multistory buildings will ruin the neighborhood. Indeed, it will no longer even be a neighborhood.

Already, our neighborhood has been zoned for increased density and we see multiple dwellings being built on what used to be single-home lots. That's enough.

Thank you,
Jennifer Schubert

Letter 421

From: hannah scott
To: PCD_OneSeattleCompPlan; Rivera, Maritza; Harrell, Bruce; PCD_CompPlan_EIS; Hazelhoff, Aja; Carroll, Patrice; Holmes, Jim; Staley, Brennon
Subject: Resident feedback: District 4 neighborhood center proposal (NE 55th St. and 40th Ave NE)
Date: Monday, May 6, 2024 3:52:58 PM

CAUTION: External Email

To whom it may concern (cc Mayor Harrell and Councilmember Rivera),

I'm writing to provide feedback on the recent city proposal to develop **District 4** as a high density neighborhood center; and specifically about the 800 ft radius around **the intersection of NE 55th St. and 40th Ave NE**. My husband and I live at 5614 40th Ave NE and this development will directly impact our home and neighborhood. 421-1

First, I would like to acknowledge the need for increased density and affordable housing in our city, which we are in support of when done in a thoughtful and sensible manner. However, the specific neighborhood that we live in does not have sufficient business opportunities for job placement, nor the public transit options to support adding high density living.

In the last 5 years hundreds of high density housing units have been developed in the area directly surrounding University Village, which is far more sensible as it is near to the light rail, UW campus, and retail spaces for business and job growth. This is where it makes sense!

In addition to added housing surrounding U Village, in the near vicinity to 55th and 40th, we have recently added 2 senior living facilities adding 150+ units and another large mixed use development will be installed at the intersection of 35th and 85th (old QFC building). Our neighborhood is simply not set up with the infrastructure to sustain the large influx of people. This will add hundreds more people on our already jam packed roads entering and leaving this area. We fought hard for bike lanes along 35th Ave NE a few years ago and it was struck down. Adding high density living without also having high density job opportunities to an already non-bike friendly neighborhood, without sufficient public transit will make this area impossible to traverse.

We are in support of positive infrastructure and sensible housing development (close to light rail, shopping center, etc.), but trying to turn the smaller pocket neighborhoods into those city centers without the transit, jobs, etc - is not the right way to fix the housing problem.

Please reconsider this site for increased density, we are not set up for it.

Hannah Scott & Cornelius Bradford Jr
5614 40th Ave NE

Sent from my iPhone

Letter 422

From: Norah Scully
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 10:29:20 AM

CAUTION: External Email

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities. 422-1

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Norah Scully
scullynorah@gmail.com
1414 NW 62nd St.
Seattle, Washington 98107

From: Juliet Shen
To: PCD_CompPlan_EIS
Cc: Rivera, Maritza
Subject: environmental Impact Statement for One Seattle Comprehensive Plan
Date: Friday, May 3, 2024 5:38:23 PM

CAUTION: External Email

Please clarify how you will stop the continued loss of tree canopy in Seattle due to in-fill developement in residential neighborhoods that allow developers to clear mature trees from single family lots in order to maximize their profit from redevelopement? The current tree ordinance has resulted in further loss of tree canopy when you state the goal is to achieve 30%. What studies have you made showing that planting young trees will compensate for removal of established mature trees during development? 423-1

Juliet Shen

From: Sandy Shettler
To: PCD_CompPlan_EIS
Subject: DEIS Comment
Date: Wednesday, May 1, 2024 10:26:12 PM

CAUTION: External Email

Hi there,

Does the 30% tree canopy goal newly listed as a "goal" also retain its status as a policy? In other words, is the City required to be make progress on toward 30% tree canopy, or is it simply aspirational? 424-1

Thank you,

Sandy Shettler

"There is a magic machine that sucks carbon out of the air, costs very little, and builds itself. It's called a tree." *- George Monbiot*

Letter 425

From: Julia Shettler
To: PCD_CompPlan_EIS; Strauss, Dan
Subject: Comments on DraftComprehensive Plan Environmental Impact Statement
Date: Thursday, May 2, 2024 9:27:09 PM

CAUTION: External Email

Please see my comments below:

425-1

1. Section P 3-3 states that “none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild.” **How does this plan impact Seattle’s urban nature and wildlife?**

2. Section P 3-3 states that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." **How does the increased hardscape, as set forth in this plan, and tree replanting programs make up for Seattle’s existing urban forest?**

3. The plan states that Seattle will make progress toward its 30% canopy goal. The new tree ordinance substantially reduces private land available for trees. **How many acres of public use land will be available to meet our tree canopy goals? How many trees will need to be replanted annually to meet our tree canopy goals?**

Letter 426

From: Sandy Shettler
To: PCD_CompPlan_EIS
Subject: Public comment on DEIS for Comprehensive Plan
Date: Monday, May 6, 2024 4:35:02 PM

CAUTION: External Email

Dear Comprehensive Plan DEIS comment coordinators:

Here is my comment on the Draft EIS for the Comprehensive Plan: 426-1

Neither the Plan nor the Draft EIS adequately consider how the loss of tree canopy, which has already been documented by the City, and which will accelerate under the proposed Plan. This will result in increased “heat islands” and adverse health effects on vulnerable populations and overburdened communities from reduced tree canopy. Indeed, the Plan and EIS are required to have strategies to reverse the documented loss of tree canopy reflected in Seattle now being further from its goal than when the goal was adopted.

1. Section P 3-3 states that “none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild.” **What is the impact of the plan specifically on Seattle’s plants and animals? What data supports the conclusion that removing most of Seattle's existing trees (47% on private residential property, 23% adjacent street trees often removed during construction) and replanting elsewhere will not have an impact on Seattle's plants and wildlife?**

2. Section P 3-3 states that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." **What analysis shows that tree planting programs, coupled with increased hardscape, will compensate for the loss of existing mature trees. What is the time frame of this analysis? Does the analysis evaluate the impact of the anticipated loss of approximately 4000 mature trees per year in the ten-year timeframe of this Plan?**

3. The plan states that Seattle will make progress toward its 30% canopy goal. The new tree ordinance substantially reduces private land available for trees. **How much public land is available to reach the 30% goal? How many trees will need to be planted in these areas every year to make up for trees removed by development?**

The Comprehensive Plan should include revisions to the tree ordinance, as well as policy changes to ensure enforcement by moving tree protection out of an agency which has a structural bias against tree retention.

426-1 cont

Thank you,

Sandy Shettler

"There is a magic machine that sucks carbon out of the air, costs very little, and builds itself. It's called a tree." *- George Monbiot*

Dear Public Policy Officials:

I support Alternative 2.

Below are comments on the DRAFT EIS, focused specifically on the plants and animals section.

427-1

P 3-3-29-30 Please analyze the potential impact of the 5 options on Seattle plants and animals. This is a Seattle EIS, not a regional or state EIS. Saying "unlikely to result in appreciable impacts on regional populations of plants or animals"' and "none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild" is avoiding commenting on the specific impacts on Seattle plants and animals.

p 3-3-30 Saying that "none of the action alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover" is not supported by trends, practice and what the impacts will be from the most recent tree removal ordinance passed in 2023. The new tree protection ordinance actually increases the potential for tree removal in several ways. One is that all the developmental areas covered by the ordinance state that the newly defined "basic tree protection area cannot be modified" despite Portland, Oregon and the Northwest Society of Arboriculture saying it can be modified to save trees. This and current lot coverage of 85 - 100% for multifamily lots and above and rezoning to occur means more trees, especially large ones, will be removed. What is your estimation of potential canopy acreage loss (over 5 year periods consistent with the city's canopy studies) with increased development density in each alternative?

- What is your estimation of planting needs and time frame to replace the lost canopy (over 5 year periods tracked by the city's canopy study)?
- How can this occur given current staffing within SDCI and the several arborists who work for SDCI?
- How could canopy replacement occur within the given time frame?

- What is the plantable acreage available for planting trees in each of the following public areas: the city's right of ways, Natural Areas and Developed Parks?
- How many trees and what size will need to be planted in these areas every year to make up for trees removed during development on lots?
- How will replacing evergreen conifers with deciduous trees lead to equivalent replacement?
- How long will it take for a 50, 60, or 80 year old conifer to regrow?
- How long would a deciduous replacement tree take to become a conifer's functional and biological equivalent from an ecosystem services standpoint?
- What is the available acreage available to plant trees on private property?
- When will it be *possible* to reach the 30% citywide goal?
- What potential is there for more than 30% tree canopy in Seattle over time?

- Is up to 40% canopy coverage, over time, as proposed in the previous Comprehensive Plan possible?

- What is the projected loss in canopy volume over the next 20 years as big conifer trees are removed?
- Canopy volume, especially of coniferous trees during our rainy season, are critical factors in reducing stormwater runoff. What is the projected increase in stormwater runoff and what costs are associated with on site and alternative city water management policies of stormwater and pollutant runoff as a result?

- As to other tree potential mitigation measures, add:
- **Amend the Tree Protection Ordinance** to require developers to maximize the retention of existing trees 6" DSH and larger.
- Give SDCI Director ability to ask for alternative site designs to save trees.
- Support building higher and building attached units to allow for tree retention and planting areas like Portland, Oregon has with 20% areas for multifamily and 40% for its 1-4 unit family zone.
- Amend Tree Protection Ordinance to require ordinance to apply to all city land use zones.
- Remove the "basic tree protection area" loophole in the Tree Protection Ordinance that allows developers to unnecessarily remove almost all large trees on lots.

427-1 cont

Additional questions that connect the draft EIS to the Comprehensive Plan:

1. The city has a goal of reaching 30% canopy cover by 2037. Please articulate what policies in the One Seattle Plan will help reach this goal.

2. An estimated 67% of urban trees are in residential areas. How will the One Seattle Plan protect these trees when the 2023 tree code allows developers to cover 85% of a lot and the only protected trees are heritage trees?

3. The state's 2023 missing middle housing law legalized two to six-unit homes in all single family neighborhoods, including neighborhood residential which has most of the city's canopy. How will this level of density impact the city's 30% canopy goal?

4. Will the One Seattle Plan consider implementing construction site designs that protect existing trees?

5. Prioritizing tree canopy expansion in areas with the least tree canopy is listed as a specific goal of one the plans three key moves. “Community & Neighborhoods”. How will the OneSeattlePlan achieve this goal under new state laws and Seattle's 2023 tree code?

6. Will the One Seattle Plan's DEIS consider removing any of the 2035 Comprehensive Plan urban forest / tree canopy policies, strategies, or other written objectives / goals? If so, which prior policies, strategies, and goals will be removed, and why?

7. Has the DEIS considered the difference in the average 2021 tree canopy cover between Neighborhood Residential zones compared to Multifamily zones? • NR zones had 33.6% coverage (7.0k acres of tree

canopy within 20.8k acres of land); • whereas Multifamily zones had 22% coverage (0.9 acres of tree canopy within 4.1k acres of land). If not, why? If so, in what way will each of the alternatives impact the long-term acreage of canopy cover within NR-zones?

8. Will the DEIS consider how much of Seattle's 1,600+ acres of Developed Park Land without tree canopy has the physical and logistical potential to plant medium to large trees?

9. Will the DEIS consider how much of Seattle's 8.0k acres of Neighborhood Residential and Multifamily Residential which has roughly 500,000 medium to large trees will be lost with the addition of 150,000 new dwellings within the next 20 years for each of the proposed alternatives?

427-1 cont

10. Will the DEIS consider a significant shift in Seattle's tree canopy from private land to public land? If so, (as was done by Cambridge and Los Angeles) will the DEIS consider how much of Seattle's 11k acres of Right-of-Way (R.O.W.) without canopy has the physical and logistical potential to plant medium to large trees (when mature) and what land volume is needed to plant that quantity?

11. How many years will it take for a sapling planted today to replace an 80 year old tree and for it to perform all the ecosystem services of that tree – from carbon sequestration and stormwater runoff, to climate and heat island mitigation?

References

Your plant and animal section does not have any references that apply to the urban forest, urban forestry, tree growth, tree measurement and the long term effects of removing thousands of mature conifers and replacing them with dwarf seedlings that are not sufficiently maintained. The City's urban forest management plan lacks specificity.

Sincerely,
Heidi Siegelbaum
Seattle, WA.

DEIS StoryMap Comment

Name: Sarajane Siegfriedt

Organization: Seattle Fair Growth

Email: sarajane3h@comcast.net

Date: 5/3/2024

Comment:

428-1

1) Where is the definition of affordability that's used in the DEIS? It's often said that you can't manage what you can't measur. Without a clear definition, the City has nothing to measure against.
2} If the Plan says it implements HB 1011, and the definition of affordability in HB 1011 is clearly stated at less than 60% of AMI for renters and less than 80% of AMI for owner-occupied, why isn't this statewide definition in the Plan?
3) In the DEIS Executive Summary, the objective for affordability is: "Increase the supply of housing to ease increasing housing prices cause by limited supply and create more opportunities for income-restricted housing." Where is the evidence that this dependence on supply-side, trickle-down housing works, or that it has worked to reduce housing costs to a level affordable to low-income people, during the past 5 to 10 years of the most extreme increases in supply of rental housing ever experienced in Seattle?
4) If you exclude fanciful supply-side housing promises, what is the likelihood that this plan will result in affordable low-income housing provided by the market?
5) Do you agree that given the state definition of affordability in HB 1110, that no new for-profit housing will be affordable without subsidies? Where does the DEIS acknowledge this?
6) Do you agree that given the state definition of affordability in HB 1110, no new market-rate townhouses are affordable to households with incomes less than 80% of AMI, without subsidies and income restrictions? Do you agree that townhouses are the predominant form of new housing being permitted in formerly single-family zones?
7) Although HB 1110 allows duplexes, triplexes, fourplexes, sixplexes, stacked flats and courtyard apartments, what is the likelihood that any of these Middle Housing forms will be built by current for-profit infill developers, when these builders refuse to build rentals of any sort? If these forms are meant to produce rental apartments in formerly single-family neighborhoods, and non-profits have told the city that they can't build there either, because they need economies of scale for construction and staffing, where are the programs or zoning incentives Urban Residential neighborhoods?
8) What is the environmental impact of continuing to lose 1.7% of our tree canopy every five years, when 70% of our tree canopy and most of the loss is in formerly single-family neighborhoods?
9) Where does the plan acknowledge that planting new trees takes 20-30 years to provide tree canopy, to shade houses, or to combat heat islands?
10) Where does the plan acknowledge that supply-side trickle-down housing takes 30-40 years to age into natural affordability, when a Stanford researcher who studies this determined that Seattle hadn't built enough housing 40 years ago for this to be a significant factor, when instead, Seattle tends to recycle older affordable rentals by rehabbing them into new, market-rate housing?
11) Specifically, how many low-income affordable rentals will be built under Alternative 5? Will this be half of all new housing units, as called for by the Governor and the Department of Commerce? If not, what zoning and policies could mitigate the extreme lack of affordable rentals in Seattle?
12) Several years ago, the City redefined "family-sized housing" as 2 bedrooms, rather than 3 bedrooms. How has that change contributed to the lack of family-sized rental housing being built, and what would

be the effect of restoring the definition of family size to the common understanding of 3 bedrooms?
13) What zoning tools are available, including MHA, to require more family-sized 3-bedroom rental housing at all income levels?
14) Where does the housing plan acknowledge the needs of seniors and people with disabilities for accessible housing without stairs? How can the plan incentivize stacked flats and courtyard apartments? Wouldn't such forms mean one-third to half the apartments would be ground-floor accessible apartments? Could these apartments be built by non-profits with the benefit of land trusts funded by the City?
15) Shouldn't courtyard apartments be an option, especially where "protected" trees occupy the center of a parcel? How can they be incentivized?
16) Instead of insensitively promoting residential units with the first floor raised up, shouldn't the City be promoting Universal Design in all new construction, so that seniors and people with disabilities can find suitable homes in our future city?
17) Since we no longer have single-family neighborhoods, should every developer be required to build sidewalks on their property, not just in multi-family or Urvan Villages, as now?
18) What is the effect of lacking 11,000 blocks of sidewalks on our vision of a 15-minute city? On accessibility for seniors, people with mobility aids, baby strollers and ADA requirements? How can we include and fund a plan for a complete sidewalk grid within 20 years?

428-1
cont

DEIS StoryMap Comment

Name: Sarajane Siegfriedt

Organization: Seattle Fair Growth

Email: sarajane3h@comcast.net

Date: 5/3/2024

Comment:

Displacement:
1) How can the plan recommend paying someone to move under the Tenant Relocation Assistance program as a mitigation, when it actually facilitates displacing someone? Someone who will certainly find no comparable rental housing within their community of support?
2) The plan says: "Overall the action alternative would tend to reduce displacement as the benefit in terms of reduced economic displacement pressure increases production of affordable units offered by the action alternatives outweigh any increased risk of physical displacement." Where is the evidence of this??? Rather, it depends on the tired and disproven theory of trickle-down housing. This, despite the chart that shows 1324 to 1416 units at 50% to 80% of AMI were lost to demolition.
3) New MHA units under Alternative 5 are 17,293, and 2788 renter households were physically displaced. How does this compare with the statement in number 2)? When the city reports on displacement, are they counting buildings demolished, or units demolished? How many of these are low-income? How can we know with an inventory?
4) This plan is suffused with the supply-side myth, such as in Land Use "All alternatives increase the overall number of units and improve housing affordability." Since no evidence is offered, and no evidence exists, are you willing to remove this false supply-side statement? Are you willing to scrub the DEIS and the Plan itself of this delusion that simply building more housing creates affordability defined in HB 1110 as less than 60% of AMI for renter households and less than 80% of AMI for owner-occupied units.? Otherwise, won't that prevent us from ever achieving housing equity? (Note: affordable doesn't mean less expensive!)

429-1

5) Isn't it true that the last CompPlan resulted in a loss of workforce or middle-income housing, since almost all market-rate rental apartments were built for high-income workers and older housing lost to demolition?
6) Isn't it true that continuing on the present course, as this plan does, will exacerbate the hollowing out of our middle class because of the loss of low-income housing and family-size housing affordable to them?

429-2

7) Isn't it true that since infill builders will never build rentals (not their business model) and no nonprofits can build at the scale of six units or less, that no affordable rental units are likely to be built in Urban Neighborhoods?
7b) And that seniors who live there now, being priced out by rising property taxes, will have no place in their own neighborhoods to downsize, unless stacked flats and courtyard buildings are incentivized or zoned for? What are the recommendations to allow seniors (of all races) to remain in their communities of support?

429-3

8) The Housing element clearly displaces trees from all new development. Where is the mitigation to prevent loss of tree canopy, by stronger enforcement of permitting, by requiring developers to replace full-size trees with full-size trees, by determining some lots to be unbuildable? Where are your mitigations for the trees that will increase the tree canopy to 30%, rather than continuing on the present course and displacing our tree canopy?

429-4

9) In the Housing Appendix, shouldn't trees be shown in the idealized drawings of housing? 429-5

10) If buildings (condos) are allowed to be four-story blocks in Urban Residential zones, doesn't that block the sun from 2-story craftsman homes that are or are likely to have solar panels? Is this economic loss being evaluated? Shouldn't four-story buildings be grouped with taller, not shorter buildings? 429-9

Letter 430

From: Kimberly Sims
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 3:28:22 PM

CAUTION: External Email

Comments Planning and Community Development EIS,

430-1

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Kimberly Sims
simsk9512@gmail.com
9512 30th Ave NE
Seattle, Washington 98115

Letter 431

From: Kimberly Sims
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Saturday, May 18, 2024 4:33:40 PM

CAUTION: External Email

Comments Planning and Community Development EIS,

431-1

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
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Mitigation recommendations:

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* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Kimberly Sims
simsk9512@gmail.com
9512 30th Ave NE
Seattle, Washington 98115

Letter 432

From: Vanessa Skantze
To: PCD_CompPlan_EIS
Cc: Morales, Tammy
Subject: Regarding the Environmental Impact Statement
Date: Sunday, May 5, 2024 2:52:21 PM

CAUTION: External Email

Greetings Councilmember Morales and others involved in the drafting of this statement.

I am deeply troubled by this plan and have questions.

Section P 3-3 states that “none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild.” This is murky at best. What study is ongoing or will be (we need this cited), and what clear provisions will be implemented to ensure protections for Seattle’s plants and animals? What is the actual impact we can expect? This is our home.

Section P 3-3 states that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." As you know we are losing tree canopy at an alarming rate due to poor legislation like the current tree protection ordinance. What studies can you cite that shows any tree planting or landscape programs could possibly compensate for lost urban forest?

The plan states that Seattle will make progress toward its 30% canopy goal. The abovementioned tree ordinance removes a large portion of private land available for trees. Is remaining public land truly sufficient to reach the 30% stated goal? Is there a plan for the many trees that must be planted in these areas every year to compensate for trees destroyed by development? May I remind you that saplings are not and will not be in our lifetime any kind of substitute for the magnificent old growth trees of Seattle being butchered?

I am deeply concerned at the lack of consideration shown to the magnificent trees and by extension, wildlife and natural beauty that we are so gifted with in being residents of Seattle. I am horrified at the trend in recent years that is turning the Emerald City into a concrete city for the interest of developers. This is not necessary in order to furnish more housing. It is simply short-sighted and a terrible choice not only for the quality of our lives but for those to come.

I am a constituent and I vote.

Sincerely,
Vanessa Maria Skantze

432-1

DEIS StoryMap Comment

Name: Reid Smith

Email: reidasmith2@gmail.com

Date: 4/12/2024

Comment:

433-1

The city should study the impacts of Social housing in every neighborhood on affordability. Of the available alternatives, I strongly prefer Alternative 5 with higher growth argets.

Letter 434

From: Alice Speers
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 11:39:50 AM

CAUTION: External Email

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities. 434-1

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Alice Speers
alicespeers@gmail.com
6850 Woodlawn Ave NE
Seattle, Washington 98115

Letter 435

From: Zoe Stephenson
To: PCD_CompPlan_EIS
Subject: Modify the Comprehensive Plan toward the recommendations of The Urbanist
Date: Monday, April 29, 2024 8:50:52 PM

CAUTION: External Email

Dear Comprehensive Plan Coordinators,

Hello, I am a Mount Baker resident and I want to provide a comment on the Comprehensive Plan. Specifically, I want the city to adjust the plan to be more like the recommendations of The Urbanist in this editorial: https://www.theurbanist.org/2024/04/29/op-ed-building-the-seattle-we-want-with-the-growth-well-have/ . Please read it and incorporate its ideas. 435-1

Allow for taller buildings, especially around transit. Support and truly incentive middle housing and affordable housing as they describe. Remove barriers for increased density. Invest in desirable, dense housing as well as business development opportunities for current residents of the South End. Add some Neighborhood Centers in South Seattle: Mt. Baker, Rainier Valley, Columbia City, Leschi, the Central District, Othello, Hillman City, Seward Park, Beacon Hill - where are the Neighborhoods Centers there that are so present in other areas of the map?

Thank you for your time in reading this email,

Zoe Stephenson
206-913-8510
3711 37th Ave S, Seattle, WA 98144

Letter 436

From: Ann Stevens
To: PCD_CompPlan_EIS
Subject: Comments
Date: Friday, May 3, 2024 3:45:40 PM

CAUTION: External Email

1. Section P 3-3 states that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." It is obvious that any alternative will result in large trees getting removed and the replacement trees will not replace the tree canopy lost for decades. The weak tree protection ordinance that was recently passed will not be sufficient to protect the canopy. What data supports the conclusion that tree planting programs will compensate for lost urban forest, given the increased hardscape in all alternatives? 436-1

2. The plan states that Seattle will make progress toward its 30% canopy goal. The new tree ordinance dramatically reduces private land available for trees. Is there actually enough public land without trees that new planting of trees can eventually reach the 30% goal?

Ann Stevens

Letter 437

From: Tonya Stiffler
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 3:32:03 PM

CAUTION: External Email

Comments Planning and Community Development EIS,

437-1

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Tonya Stiffler
tstiffler@comcast.net
18051 Sunnyside Ave No
Shoreline, Washington 98133

Letter 438

From: Sean Stockwell
To: PCD_CompPlan_EIS
Subject: Not Enough - Seattle"s Comprehensive Plan
Date: Saturday, May 4, 2024 10:29:51 AM

CAUTION: External Email

Hello,

I am writing to encourage the city to plan for more types of housing throughout the city.

438-1

I am currently a resident in the Ballard area. And like many of my peers (young professionals in their 20-30s) I was hoping Seattle would take the opportunity to start building out our housing supply in order to blunt the ridiculous rise of housing prices, so that people like me could have a chance to settle here long-term.

I am requesting that the comprehensive plan be revised with the following modifications.

Encourage transit-oriented development. Why has the plan not included more zoning changes near frequent transit corridors? Transit enables greater density, and Seattle should be tapping into that. Additionally, zoning changes should be applied to a larger area surrounding the transit stops - and not just along the arterial.

Increase the FAR. State model code allows for 1.6 FAR in sixplex areas. 0.9 is overly restrictive and won't allow for the development of multi-family flats. Why would we want to restrict this? Many people find flats far more desirable to multi-story townhomes, and many people would have a great deal of difficulty living in a townhome, where everything is on a different floor! Whether they are elderly, disabled, etc. Give our neighborhoods the means to build housing for everyone. This *needs* to be changed.

Add back the original Neighborhood Centers that were removed and allow neighborhood businesses! - Living near a coffee shop or taproom is enormously popular, and adds a communal spot for neighbors to gather, and for small businesses to thrive. And it lessens peoples' dependence on cars to shop for basic goods ... because they can walk to them.

Remove Parking Requirements - This strikes me as overly restrictive zoning. Let the consumer decide if they want to live somewhere with a parking spot or not. If I choose to live without a car, why would you force me into renting/purchasing a unit that will have an unused parking spot?

Please don't let this opportunity pass us by. Seattle is a city full of beauty and opportunity. It will continue to be one of the most desirable places in the country, and we should embrace that. We can make a Seattle that works for everyone. But it starts with updating this plan to something far more visionary.

Thank you,
Sean Stockwell

DEIS StoryMap Comment

Name: Linda Strock

Organization: HLUMC

Email: boblindastrock@yahoo.com

439-1

Date: 5/5/2024

Comment:

We would advocate for density. Much needed.

Letter 440

DEIS StoryMap Comment

Name: T.J. Stutman

Email: tstutman@gmail.com

Date: 5/6/2024

Comment:

I support Alternative 5 as stated in the draft EIS, including the development of a new Urban Center on 130th Street. However, I do feel that the plan is not ambitious enough. I encourage more housing options in the neighborhood, including addressing the hidden obstacles to building denser housing. To that end, I ask that you consider: 440-1

1. Minimize or remove parking requirements -- make this a pedestrian-oriented neighborhood not beholden to car traffic and with precious space devoted to housing for people, not storage for cars.

2. Increase floor-area ratios -- The draft plan caps floor-area ratio at too low a number: 0.9 for all middle housing. This will reduce the amount of housing actually built. Other jurisdictions, including Spokane, have aimed much higher in this area. And the WA Dept of Commerce middle housing model code recommends higher floor area ratio as well. Don't make Seattle the outlier -- we should be leading in this area, not following.

3. Consider a broader rezone in the 130th Street area -- In my feedback on the 1 Seattle Comp Plan, I suggested extending upzones to more areas of the city rather than limiting to certain areas of the city. I still encourage a more ambitious approach to allowing different housing options, including apartments, across the city, but I especially encourage the development of taller and denser residential and commercial uses near the new 130th Street light rail station. 440-2

To the last point, I encourage the City to consider Pastor Laura Baumgartner of the Haller Lake Methodist Church's request to allow their lot to accommodate both residential and commercial development. We feel this would add new opportunity for both housing and small business in the new urban center: 440-3

"We would like to request that the DEIS be revised to include NC2-55 zoning for the church property, Lots 3, 4 and 5, of block 65, in the H.E. Orr Park Division No. 6 so that a development might be considered that includes both commercial and residential components." (feedback submitted 4/13/24)

Thank you for the opportunity to provide feedback.

T.J.

Letter 441

From: Liann Sundquist
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 7:30:49 AM

CAUTION: External Email

Comments Planning and Community Development EIS,

441-1

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
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Mitigation recommendations:

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* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Liann Sundquist
liann@oz.net
7211-36th Avenue SW
Seattle, Washington 98126-3218

Letter 442

From: scott.surdyke@comcast.net
To: PCD_OneSeattleCompPlan; PCD_CompPlan_EIS
Cc: Strauss, Dan; bob.kettle@seattle.gov; Hubner, Michael
Subject: One Seattle Comments- Magnolia/Interbay Land Use Committee
Date: Monday, May 6, 2024 1:36:23 PM

CAUTION: External Email

Good afternoon,

442-1

Thank you for the opportunity to submit comments. Below are summarized comments from Magnolia/Interbay Land Use Committee's last meeting, which included a presentation and overview of the One Seattle Plan.
Please feel to contact me if you have any questions.

Thank you,

Scott Surdyke
Chair, Magnolia/Interbay Land Use Committee
Trustee, Magnolia Community Council

Urban Residential Zone: RE: Loss of Tree Canopy

- We support the increased zoning, and inclusion of +2 units (if affordable)
- Our group is very concerned that the new zoning will substantially diminish Seattle's (and our neighborhood's) tree canopy, which will counter the city's tree canopy goals and increase potential for urban heat islands
- Please consider more substantial setbacks in the front yards (10'+) that allow for larger trees, more landscaping and personalized stoops
- Consider height or density bonuses (or reductions in setback requirements) for builders who strive to preserve existing trees (esp. substantial trees)
- Consider eliminating or reducing the side setbacks (offsetting the increase in front or back yards). This will allow for wider (more livable) dwellings, rather and super-skinny and inefficient 10' wide rowhouses.
- Consider encouraging more diverse housing types. Many design and real estate professionals (and tenants) decry the proliferation of 10' wide rowhouses. NOTE: Baltimore and Baltimore County, home to tens of thousands of rowhouses, does NOT allow rowhouses narrower than 16' because anything less is deemed undesirable and/or not livable.
- Remember, Seattle is NOT San Francisco (or San Francisco's Daly City). What makes our city and neighborhoods unique and livable is the substantial green canopy and connected greenscape. We do not support zoning that promotes the reduction of the treen canopy and substantially reduces opportunities for landscaping (which also is necessary for wildlife)

Neighborhood Centers:

There is almost unanimous consensus in our neighborhood that Magnolia Village is seriously underdeveloped and needs a major overhaul. We applaud the opportunity to have more robust zoning (65') and look forward to the discussion.

- We were surprised and disappointed that the proposed **North Magnolia Neighborhood Cente**r was dropped from the NC designation. This part of Magnolia (along 34th Ave and at the intersection of Government Way) is near the entrance to Discovery Park and has seen mid-rise, multifamily development for more than 50 years, including several low-income senior housing projects. This part of the neighborhood is ripe for additional development due to a number of factors:

  - Mid-rise development has occurred here for more than 50 years
  - Area is served by 2 bus lines (24 and 33)
  - Right next to the entrance to the City 's largest park
  - Major grocery store located here (Met Market)
  - Shops and services already exist, primarily in several mid-rise multifamily buildings.
  - Close to planned affordable housing village at nearby Ft. Lawton

442-1 cont

Station-area Planning

- There is general consensus that LINK station-area zoning may be too conservative. TOD neighborhoods like Capitol Hill, Northgate, and even Ballard could likely support much taller, denser buildings. The approach that Vancouver and Burnaby, BC take is much more urban and promotes much more housing at rail stations

Letter 443

From: Rick Swing
To: PCD_CompPlan_EIS; council_@seattle.gov
Subject: Draft EIS
Date: Sunday, May 5, 2024 10:39:32 PM

CAUTION: External Email

Alternative 2 preferred

- Amend the Tree Protection Ordinance to require developers to maximize the retention of existing trees 6" DSH and larger.
- Give SCCI Director the ability to ask for alternative site designs to save trees.
- Support building higher and building attached units to allow for tree retention and planting areas like Portland, Oregon has with 20% areas for multifamily and 40% for its 1-4 unit family zone.
- Amend Tree Protection Ordinance to require ordinance to apply to all city land use zones.
- Remove the "basic tree protection area" loophole in the Tree Protection Ordinance that allows developers to unnecessarily remove almost all large trees on lots.

443-1

Thank you
,Rick

DEIS StoryMap Comment

Name: Ryan Talen

Email: ry.talen@gmail.com

Date: 4/10/2024

Comment:

I am writing to you because adding more housing in all neighborhoods, planning for much more growth, and developing the city in a more sustainable and equitable way via this Seattle Comprehensive Plan Update is a major political priority for me. I am looking to you and the Council for leadership on this and will certainly be considering your decisions and work on the Comp Plan in the next election. 444-1

I am a renter in Capitol Hill , and I believe that the City of Seattle did not listen to the overwhelming majority's call for an Alternative 6 vision, which would welcome more neighbors in areas with low displacement risk and high opportunity. Instead the current draft plan will perpetuate a racist history of exclusionary land use. To create a more sustainable, affordable, vibrant city, the plan should allow highrises and skyscrapers outside of just Regional Centers.

In Capitol Hill in particular, I think that the plan should Allow high-rise apartments.

If the City of Seattle adopted my above proposed changes, then we would be able to create a more affordable city for everyone.

Sincerely,
Ryan Talen

DEIS StoryMap Comment

Name: Ryan Talen

Email: ryan.talen@protonmail.com

Date: 5/4/2024

Comment:

The city should study the impacts of expanded highrise zoning in Urban Neighborhoods within 1 mile of parks >1 acre. Of the available alternatives, I strongly prefer Alternative 5 with higher growth targets.

445-1

May 6, 2024

City of Seattle Mayor, Council, and Office of Planning and Community Development

Subject: One Seattle Comprehensive Plan Update Draft EIS Comments and One Seattle Comprehensive Plan: Draft for Public Review Comments

Dear Mayor Harrell, City Council Members, Director Quirindongo, and OPCD staff,

Thank you for the opportunity to comment on the "One Seattle Comprehensive Plan Update Draft EIS" (DEIS) and the "One Seattle Comprehensive Plan: Draft for Public Review" ("Draft Plan"). Please find my comments below. They are based on the letter provided by the Complete Communities Coalition, as it incorporates the best thinking of a broad collection of progressive land use organizations within our city. 446-1

I appreciate OPCD's work that produced the Draft Plan. I strongly share the values expressed in the Draft Plan and concur with much of the Department's analysis of the challenges facing the city and their root causes. However, the plan does not go far enough and seems intent on continuing the status quo of underproduction of housing, escalating costs, and continued displacement. To truly make housing more affordable, advance racial equity, mitigate displacement, and meet our climate goals, the Mayor's Recommended Plan and the Final Environmental Impact Statement ("FEIS") should incorporate the following revisions:

EIS Preferred Alternative

I recommend that the FEIS designate a Preferred Alternative. While FEIS documents prepared pursuant to SEPA are not required to designate a "preferred alternative," there is a sound reason why doing so has become common practice among lead agencies over the years. As the Department of Ecology has explained, designation of a preferred alternative gives public reviewers more awareness of which alternative the professional staff members within the lead agency feel is best, or which appears most likely to be approved.In the high-profile, contentious and complex instance of the One Seattle Plan, identification of a preferred alternative in the FEIS would be an especially useful step. Not only has the DEIS discussed and analyzed five different alternatives, but two different complex alternative proposals have also entered public discussion in the form of the Mayor's Draft Plan and the August 2023 OPCD staff recommended plan ("OPCD Draft Plan"). Given the sprawling and complex interrelated impacts that the One Seattle Plan will have on the future of our City, the FEIS will be best positioned to inform productive discussion and understanding if it clearly designates a preferred alternative.

- The growth strategy described by OPCD staff in their August 2023 proposal should be the basis for the preferred alternative. The OPCD Draft Plan is the boldest growth strategy presented to date. It responds to the overwhelming community feedback provided during scoping, and we believe it will best meet the city's needs over the next decades.
- If the FEIS does not designate the growth strategy from the OPCD Draft Plan (or an updated version) as its preferred alternative, it should adopt a modified version of the DEIS's Alternative 5. Preferably, modifications to the DEIS Alternative 5 would incorporate as many

attributes of the OPCD Draft Plan as possible, and as many of the policy positions requested in this letter as possible.

- If the FEIS adopts theDraft Mayor's Recommended Plan growth strategy as a preferred alternative, it should adopt many of the features of the OPCD Draft Plan or DEIS's Alternative 5, together with the additions requested by this letter.

- The FEIS should include a table that summarizes zoned land development capacity analysis and projected housing needs for the Preferred Alternative. The table should disaggregate housing unit development by AMI band, following the guidance provided by the Department of Commerce, in order to ensure we are providing sufficient capacity for housing affordable to low-income people and demonstrate that the plan will comply with the Growth Management Act's Housing Element requirements provided in RCW 36.70a.070(2)(c)-(d). Table 34 in the Draft Housing Appendix provides an excellent template for this information.

446-1 cont

Urban and Regional Centers

Regional and Urban Centers have and will continue to be the areas where the most new housing is built in the city. Currently, the City is proposing very little change within existing centers, minor expansion of the smallest centers, and only one new center at NE 130th St. The City should expand the potential for growth in Urban and Regional Centers by both increasing the area they cover and the intensity of development allowed. The City should also seek to undo the past harms of the Urban Village strategy, which is the basis of our centers-based growth framework, by allowing more intense development near public facilities such as parks, water ways, and high performance schools. The City should also take this opportunity to address the inequitable distribution of Regional Centers, none of which are currently located in South Seattle.

To Facilitate Immediate Progress, the Mayor's Recommended Plan Should:

- Continue to include the addition of Ballard as a Regional Growth Center and 130th Street Station as an Urban Center.

- Continue to include the expansions of existing Urban Centers such as the Greenwood-Phinney Ridge, Queen Anne, and West Seattle Junction Urban Centers.

- Expand the University District Regional Center to include University Village and lands adjacent to Seattle Children's Hospital, or create a new Urban Center to incorporate it.

- Create additional Urban Centers at all future Link stations, excepting areas within Manufacturing and Industrial Centers.

- Allow high rise zoning in all Regional Centers and within all Urban Centers adjacent to Link Stations.

- Allow eight-story residential construction on the majority of the land within all Urban Centers. Explore allowing greater height with the use of mass timber, to incentivize low carbon construction.
- Designate Mt. Baker and West Seattle Junction Urban Centers as future Regional Centers, include them in the list of Centers to receive updated subarea plans, and plan for combined jobs and housing unit density that exceed King County's Urban Growth Center threshold for both centers.

446-1 cont

To facilitate continued innovation and flexibility in the months and years to come, the FEIS should:

- Study the maximum possible expansion of all existing Urban and Regional Centers.
- Study additional Urban Centers near all proposed Link Stations and adjacent to our greatest parks, including Discovery and Magnuson.
- Study increasing the zoning capacity of all Regional and Urban Center to maximize the productions of housing.
- Study the impacts of designating Mt. Baker and West Seattle Junction Urban Centers as Urban Growth Centers, using the definition provided in the 2021 King County Countywide Planning Policies.

Neighborhood Centers

The One Seattle Plan's proposed "Neighborhood Center" model presents dramatic opportunities for our City. If fully realized, this could lead to increased housing supply and affordability, enhanced economic opportunities, improved walkability, and better environmental outcomes for more of Seattle's neighborhoods and a broader segment of the city's population. We request the following actions to bring the Council's request for a "fifteen minute city" and the Mayor's vision of "One Seattle" closer to reality.

To facilitate immediate progress, the Mayor's Recommended Plan and any Preferred Alternative should:

- Allow for the development of all Neighborhood Centers studied under EIS Alternative 5 and proposed under the OPCD Draft Plan. The total number of Neighborhood Centers should not be less than 50. Additional Neighborhood Centers should include (but not be limited to): Alki, High Point, Seward Park, South Beacon Hill, Gas Works, North Magnolia, Roanoke Park (North Broadway), Nickerson (North Queen Anne), and Upper Fremont.
- Expand the radii of Neighborhood Centers to ¼ mile to create enough land to support a small cluster of mixed-use development.

- Increase permitted Floor Area Ratio (FAR) to no less than 2.0 for multifamily housing in all Neighborhood Centers.
- Increase height limits to 85 feet throughout all Neighborhood Centers.

446-1 cont

To facilitate continued innovation and flexibility in the months and years to come, the FEIS should:

- Study expanding all Neighborhood Centers up to a ten-minute walkshed and 2.5 maximum FAR, for all multifamily housing across those areas.
- Be sure to thoroughly study any potential adverse environmental impacts of these actions, as well as the probable significant adverse environmental impacts of failing to take such measures.

Corridors

The DEIS studies a "Corridor" growth strategy (Alternative 4) that would focus new housing in areas near transit and amenities. Increasing access to frequent transit and parks is one of our coalition's goals, and it will help the City reduce cost of living while improving quality of life. While the DEIS includes this strategy, the Draft Plan significantly reduces the amount of area where such flexibility and walkable density would be possible. This is inconsistent with the Mayor's One Seattle goals for housing, transportation, environmental, and climate. By restoring multifamily housing to the parcels off of arterials, the Mayor's Recommended Plan can avoid disproportionately exposing renter households to environmental harms caused by high-traffic roadways. This would be more consistent with the City's One Seattle values of racial and environmental justice.

To facilitate immediate progress, the Mayor's Recommended Plan and any Preferred Alternative should:

- Add a Corridor place type that allows mid rise housing up to 85 feet in height. This place type should include all parcels currently zoned Neighborhood Residential that are:
    a. within 0.5 miles (roughly a 10-minute walk) of light rail or bus rapid transit; or
    b. within 0.25 miles (roughly a 5-minute walk) of frequent bus stops.
- Where appropriate, add the Corridor place type to policies that reference the three centers (Regional, Urban, and Neighborhood).
- Impose a maximum FAR no lower than 2.0 for multifamily development in Corridor areas.
- Allow mixed-use residential development in Corridor areas.

To facilitate continued innovation and flexibility in the months and years to come, the FEIS should:

- Study all Corridor areas contemplated by EIS Alternative 5 or the OPCD Draft Plan up to a ten-minute walkshed, and no less than 2.5 maximum FAR, for all multifamily housing across those areas.
- Be sure to thoroughly study the probable significant adverse environmental impacts of failing to take such measures.

446-1 cont

Urban Neighborhoods & Middle Housing

This section focuses on the One Seattle plan's implementation of HB 1110 (2023) in Neighborhood Residential Areas and throughout the city. Full implementation of the state law needs to be planned to ensure we encourage a diversity of housing types, including backyard cottages, boarding houses, townhouses, and stacked flats. Urban Residential zones need to be planned to help us meet our equity, environmental, and affordability goals.

To facilitate immediate progress, the Mayor's Recommended Plan and any Preferred Alternative should:

- Increase the allowed FAR for middle housing to feasibly allow for family-sized two, three, and four bedroom homes to be built throughout the city. At a minimum, the city should align standards with the Department of Commerce's model ordinance. We recommend no less than 1.4 FAR for fourplexes and no less than 1.6 FAR for six- plexes.
- Create a 0.2 FAR bonus for stacked flats in middle housing, to incentivize the creation of physically accessible housing.
- Create a 0.1 FAR bonus for each Multifamily Tax Exemption (MFTE) unit, along with increasing height to 40 feet if two or more MFTE units are included.
- Encourage the development of housing for large households, including families with children and elders, by providing a development incentive of 0.05 additional FAR for 2 bedroom homes and 0.1 additional FAR for 3 or 4 bedroom homes.
- Create a 0.2 FAR bonus for housing that satisfies defined passive house, living building, or LEED specifications.
- Allow for a full range of middle housing types in Neighborhood Residential areas throughout the city, including allowing for six-plexes by right in all areas with low-displacement risk.
- Align the Draft Plan with HB 1110, by ensuring any alternative density requirements in high-displacement risk areas are temporary. Create a plan for implementing appropriate anti-displacement policies by the next implementation progress report. Partner with BIPOC-led community organizations to engage neighborhood and community residents,

both present and former, to better understand how to accommodate their housing needs and improve community resilience.

- Eliminate requirements for side and front setbacks, to allow for more of the lot to be usable open space and accommodate trees.
- When calculating minimum density, do not include ADU and DADU's in the unit density metric.
- Allow subdivision of lots into lots less than 1,000 square feet.
- Ensure that middle housing is not subject to more restrictive land use or other code requirements than single family housing, as required under HB 1101.

446-1 cont

- Expand the "corner store" concept to allow greater flexibility for commercial uses to be introduced to neighborhoods that are currently primarily residential. Examples of greater flexibility include: non-residential uses that meet the daily needs of residents (e.g., health care, small grocers, "third place" leisure activities, etc.), ability to locate on off-corner lots, and increased height and FAR limits to facilitate the development of ground floor commercial units.

To facilitate continued innovation and flexibility in the months and years to come, the FEIS should:

- Study the impacts of removing side setback requirements in all areas, to allow for more of the lot to be usable open space and accommodate trees.

Affordable Housing and Social Housing

The City of Seattle is facing a housing crisis in terms of scarcity and affordability. One of the goals of the One Seattle Plan, which we strongly support, is to achieve housing abundance:

"When housing is safe, affordable, and abundant, we can fulfill many of our goals for the future….Achieving housing abundance is fundamental to addressing our homelessness crisis, redressing historical patterns of segregation and exclusion, and creating opportunities for displaced residents to return to their communities."

I appreciate the inclusion of the affordable housing bonus to address this pressing need, by allowing for additional development capacity for income-restricted affordable housing in neighborhood residential areas that are within ¼ mile of frequent transit. Though I have not seen a detailed proposal for the income restrictions and set aside requirements, it is our understanding that this bonus is intended for use by non-profits and others building wholly affordable housing projects. This will blunt the impact of the proposed density bonus, as any developments benefiting from the bonus will need to compete for limited public funds available for affordable housing.

To facilitate immediate progress, the Mayor's Recommended Plan and any Preferred Alternative should:

- Revise the proposed affordable housing bonus to ensure it is usable by a broad range of developers–including private, nonprofit, and social housing developers–without needing scarce public funding. This could look like a requirement for no less than 20% of the homes to be affordable at 60% AMI for rental or 80% AMI for ownership.
- Increase the proposed FAR limit from 1.8 to no less than 2.2.
- Increase the proposed lot coverage from 60% to 70%.
- Allow the proposed affordable housing bonus to be used outside of frequent transit areas.

446-1 cont

To facilitate continued innovation and flexibility in the months and years to come, the FEIS should:

- Study the impacts of allowing up to 80% lot coverage for developments using the affordable housing bonus.

Equitable Development and Anti-Displacement Strategies

The City currently provides support to communities disproportionately impacted by displacement pressure, economic exclusion, and disinvestment through a variety of different equitable development programs and anti-displacement policies. I support the continuation of all existing equitable development and anti-displacement tools, notably the Equitable Development Initiative. However, it is not enough for the City to simply continue its current programs; the tools and policies need to be expanded based on feedback from communities disproportionately impacted by discrimination and displacement pressure.

To facilitate immediate progress, the Mayor's Recommended Plan and any Preferred Alternative should:

- Expand the City's land banking strategy to support affordable rental, affordable ownership, and social housing projects.
- Create incentives and provide technical assistance for small community-based organizations to partner with larger developers in Equitable Development Initiative projects.
- Facilitate generational wealth building, by providing a way for low-income and fixed-income families to sell their home and gain a new high-quality home on the site of the new development.
- Collaborate with the Seattle school district to plan for affordable, family-sized housing near schools, pursuant to City Ordinance 124919.

- Provide information to support the development of Community Opportunity to Purchase Act (COPA) legislation, which would allow qualified non-profit organizations the first opportunity to make an offer on real estate sales involving multifamily buildings with low-income residents.

- Incentivize the use of affirmative marketing and community preference policies for private developments not receiving public subsidy. Continue to incentivize such policies for publicly-funded projects.

- Continue to explore and support the expansion of short-term rental assistance programs.

446-1 cont

To facilitate continued innovation and flexibility in the months and years to come, the FEIS should:

- Study the impact of displacement and lack of affordable housing on school enrollment and ensuing school budget constraints and create incentives for family-sized units near schools.

Multifamily Housing Mapping Error

The Draft Plan appears to include an unintentional mapping oversight which, if not corrected, would likely result in a loss of *existing* zoned housing capacity and a reduction in the fifteen-minute walkable neighborhoods envisioned by the Mayor's One Seattle policies and championed by the City Council. This loss would be found in neighborhoods that are today designated for "Multifamily Housing" future land uses *under the currently effective Comprehensive Plan*, but erroneously have been proposed to transition into Urban Neighborhood status under the Draft Plan. This change would replace a designation in the current Comprehensive Plan where "you might find duplexes or townhouses, walk-up apartments or highrise towers," with a new place type that "would primarily allow housing types within a three-story scale, such as detached homes, duplexes, triplexes, fourplexes and stacked flats." A ceiling of stacked flats in the proposed designation is much reduced from a ceiling of highrise towers in the existing designation. In particular, this issue would impact the proposed redevelopment of Fort Lawton with affordable housing , which is a major priority of the City of Seattle and Mayor's Office.

To preserve affordability, walkability and environmental progress made over the last ten years, the Mayor's Recommended Plan should:

- Ensure that all areas that are currently designated as Multifamily Residential on today's future land use map be redesignated as a Corridor, Neighborhood Center, Urban Center or Regional Center, rather than Urban Neighborhood.

Transportation

Safe, accessible,and frequent transportation is a key element to the success of any city. I strongly support Goal TG 1 in the Draft Plan, which states, "Transportation decisions, strategies, and investments support the growth strategy for the City and the region and are coordinated with this Plan's land use goals." In order to achieve this, Seattle should prioritize *proximity*-based strategies over mobility-based ones. One example of this approach would be to plan for far more Neighborhood Centers than are included in the Draft Plan—especially in low-density, car-dependent neighborhoods (see the Neighborhood Centers section of this letter). In its mobility strategy, Seattle should prioritize carbon-neutral transportation modes such as walking, rolling, and cycling, and carbon-light modes such as mass transit and carpooling. Transportation infrastructure that primarily serves personal automobiles, including parking, should be deprioritized in relation to these other modes.

446-1 cont

To Facilitate Immediate Progress, the Mayor's Recommended Plan Should:

- Plan to accommodate housing and job growth in a manner that will enable the City to achieve the following transportation and environmental goals: net-zero citywide emissions by 2050 (see T 4.1), 20% reduction in VMT by 2044 (see T 4.2), and a 37% reduction in VMT by 2044.
- Eliminate parking minimum requirements for all land uses types citywide.
- Plan to serve all Neighborhood Centers with frequent bus service.
- Add the Corridor place type to the lists of places described in T 1.2, T 3.1, and T.2.12; for example, "all centers (Regional, Urban, and Neighborhood) and corridors".
- Clarify that T 4.4, which describes neighborhood-scale strategies to reduce carbon emissions and pollution, applies to all types of neighborhoods—including neighborhoods with high-traffic arterial streets with frequent transit service.
- Use a racial equity lens when prioritizing sidewalk and pedestrian infrastructure construction in areas that currently lack it (see T 3.20).
- Plan to prioritize street right of way differently in different contexts: within centers and neighborhoods, streets should prioritize active transportation that is safe and sustainable; between centers and neighborhoods, streets should prioritize public transit; and within and between Manufacturing and Industrial Centers, streets should safely accommodate the reliable movement of goods.

To facilitate continued innovation and flexibility in the months and years to come, the FEIS should:

- Study the environmental impacts of maximum parking requirements for residential and commercial uses in frequent transit service areas.

Climate & Environment

The City is preparing to comply with new climate requirements that will be required by state law in 2029. I support the City's decision to get ahead of these upcoming requirements, and I applaud the goal of 58% reduction in greenhouse gas emissions from 2008 levels. I also support the City's study of the environmental impacts of planning for additional density within Seattle, which found that DEIS Alternative 5 would produce the lowest GHG emissions per capita. I particularly support the following statement in the DEIS:

While each [EIS] alternative would generate GHG emissions from growth and development within the city, the benefit of channeling development to targeted areas that might otherwise occur in peripheral areas of the city or region could serve to offset these impacts. (DEIS, p.3.2-51)

446-1 cont

I encourage the City to set additional specific climate goals that will allow for progress to be accurately assessed throughout the next twenty years.

To Facilitate Immediate Progress, the Mayor's Recommended Plan Should:

- Prioritize supporting transportation mode shift toward active mobility options over automobile electrification.
- Define specific anti-displacement strategies that meet the needs of communities most likely to be impacted by climate change.
- Set goals for building de-carbonization that can inform future revisions to the energy code.

To facilitate continued innovation and flexibility in the months and years to come, the FEIS should:

- Provide additional explanation for the conclusion that Alternative 1: No Action would have no significant adverse impacts on greenhouse gas emissions or air quality. Given the anticipated impacts that this strategy would have on greenfield development and increased vehicle-miles traveled, particularly by commuters, explain why these impacts would not be significant.

Thank you for considering my comments. I urge you all to think beyond the next election and to the future of our city. Do we want to the shut the door behind us or do we want to continue to welcome people from all walks of life to our wonderful city? If the latter then we need to plan for it and allow for the highest number of new homes.

Sincerely,

Patrick Taylor
2006 15th Ave S
Seattle, WA 98144

Letter 447

From: Sarah Taylor
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 9:31:25 AM

CAUTION: External Email

Comments Planning and Community Development EIS,

We need more tree canopy!!!!
Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities. 447-1

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Sarah Taylor
sunbella6@icloud.com
8302 Linden N
Seattle, Washington 98103

DEIS StoryMap Comment

Name: Mary K.Tenhoff-Barton

Email: MaryTBarton@gmail.com

Date: 5/5/2024

Comment:

There does not seem enough protections for the trees. It takes years to grow trees, how are you planning on mitigating the loss of trees? 448-1 What is consider affordable housing for the middle clas with families? How does this plan provide for seniors and there issues? There seems a lack of incentives for building for families, families need more space. 448-2

DEIS StoryMap Comment

Name: Greg Thiessen

Email: greg.s.thiessen@gmail.com

Date: 4/10/2024

Comment:

The city should study the impacts of higher floor area ratios for middle housing in all residential zones, such as those corresponding to the state model code for middle housing. Of the available alternatives, I strongly prefer Alternative 5 with higher growth targets. 449-1

Letter 450

From: Robin Thomas
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 12:49:26 PM

CAUTION: External Email

Comments Planning and Community Development EIS,

450-1

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Robin Thomas
rubiclark@yahoo.com
1015 Mason St
Bellingham, Washington 98225

Letter 451

From: Toby
To: PCD_CompPlan_EIS; LEG_CouncilMembers
Subject: Comment on DEIS
Date: Sunday, May 5, 2024 8:51:43 AM

CAUTION: External Email

Please note my comment on the DEIS:

451-1

1: Section P 3-3 states that “none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild.” What is the impact of the plan specifically on Seattle’s plants and animals? Where is the study?

2: Section P 3-3 states that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." What analysis shows that tree planting programs, coupled with increased hardscape, will compensate for lost urban forest? Often trees planted as part of developers work die within three years. Even if those trees survive it will be many decades before they provide the same amount of shade and habitat as an adult tree, precisely at the time when climate change is rapidly affecting us. We need our mature trees right now more than ever.

3: The plan states that Seattle will make progress toward its 30% canopy goal. The new tree ordinance substantially reduces private land available for trees. How much public land is available to reach the 30% goal? How many trees will need to be planted in these areas every year to make up for trees removed by development?

Sincerely,
Toby Thomas

1106 E Thomas St, #1
Seattle, WA 98102

DEIS StoryMap Comment

Name: Kristen Toms

Email: kristen_toms@hotmail.com

Date: 5/6/2024

Comment:

452-1

Hello,
We have lived in the Pinehurst neighborhood since 2000. I just wanted to put my vote in for Alternative/Option 5. I think that more housing options in our growing community is a good thing and is needed.
Thank you,
Kristen

Letter 453

From: michael toohey
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 10:44:29 AM

CAUTION: External Email

Comments Planning and Community Development EIS,

453-1

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

michael toohey
toohey.michael@gmail.com
12004 17th Ave NE
Seattle, Washington 98125

DEIS StoryMap Comment

Name: Luke Travis

Email: luke.foobar@gmail.com

Date: 4/18/2024

Comment:

454-1

The city should study the impacts of higher density in all residential zones, such as the templates offered in the state model code for middle housing or better. Please especially study the impact this would have on housing affordability (both owning and renting). Of the available alternatives, I strongly prefer Alternative 5 with higher growth targets.

Letter 455

From:	Matthew Trecha
To:	PCD_CompPlan_EIS
Cc:	Kettle, Robert; LEG_CouncilMembers
Subject:	Community feedback - One Seattle draft Comprehensive Plan - be more aggressive, ignore all Mayor Harrell edits
Date:	Wednesday, April 17, 2024 7:55:41 AM

CAUTION: External Email

Hi One Seattle Comprehensive Plan draft update team -

First, thank you for the work you do for the City. This is complex stuff!

455-1

My community feedback is the following:
Reverse any and all requests, edits or edicts from the Mayor's Office - Mayor Harrell has been an utter failure when it comes to ensuring the needs of our community are met both in the near-term and long-term as it comes to 'Space Needle thinking' around housing. A homelessness emergency is a 'build more housing everywhere all the time' emergency. We need more housing in every neighborhood now, tomorrow, *and* 20 years in the future.

My personal Community Feedback to the One Seattle draft plan includes the following:
a) the removal of any and all parking minimums from every residential zone in the city (a single parking spot can cost a residential developer up to $100,000 - drastically increasing the cost of homes, condos, and apartment rents)
b) 4-6 story condo/apartment buildings by right in all neighborhoods; 20 stories (or higher) tall residential buildings by right within 0.25 miles of all light rail station (please see the entire province of British Columbia's recent legislation allowing height by right within distances to public transit: "For all SkyTrain stations in Metro Vancouver, municipal governments will be required to allow minimum residential building heights of up to 20 storeys for sites within 200 metres of a station, up to 12 storeys for sites between 201 and 400 metres from a station, and up to eight storeys for sites 401 metres to 800 metres from a station."
c) groundfloor multi-use storefronts (office, shops, restaurants) by right in all neighborhoods with zero minimum parking required (this drastically reduces the amount of people who need to get into a car to go to work, eat a meal out or buy daily essentials for use at home)
d) the inclusion of multi-modal transportation options included in all plans and requirements for minimum bike parking and public transit-supportive amenities in all residential buildings (e.g., public transit passes that come with each lease (King County Metro has already launched a program for this), real-time arrival screens, information displays, etc.)

I'm incredibly disappointed to learn - through The Urbanist - of how this plan has been watered down. Please see The Urbanist "Planners Proposed Bigger Upzones Before Harrell's Team Intervened, Records Show" (April 16, 2024) for the story I reference.

I fully endorse and agree with plans put forward by **Complete Communities Coalition** (https://www.completecommunitiescoalition.org/policy-priorities), The Urbanist, and other members of our community who are advocating for anything that was previously cut from the Comp Plan, including an aggressive Option 6 as advocated by Councilmembers Mosqueda and Morales prior to the recent elections.

Housing is the #1 reason I would leave Seattle and Puget Sound in the near future (3-5 years) - the Mayor's current Comprehensive Plan draft guarantees Seattle will continue to fail upward as a city.

Discard all edits by the Mayor's Office. Be aggressive and follow the plan you had prior to the Mayor's edits.

Thank you,
Matthew Trecha
888 Western Ave
Seattle, WA 98104

455-1
cont

Letter 456

From: Megan Tully
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 8:49:13 AM

CAUTION: External Email

Comments Planning and Community Development EIS,

456-1

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Megan Tully
megtully@hotmail.com
13722 Palatine Ave N
Seattle, Washington WA

From: Caroline Ullmann
To: PCD_CompPlan_EIS
Subject: Comments: Draft DEIS One Seattle Plan Comprehensive Plan Update
Date: Friday, May 3, 2024 3:40:13 PM

CAUTION: External Email

Thank you for the opportunity to comment on the One Seattle draft comprehensive plan, draft environmental impact statement and neighborhood rezoning proposals.

We are Caroline and Mike Ullmann; we've lived in Maple Leaf since 1998. Our residential lot has several mature evergreen trees, we garden without pesticides to support wildlife and the city recently designated our street (12th Ave NE) as a "Neighborhood Greenway." We have a deep respect for nature conservation, the positive effects of living beneath trees and the preservation of habitat. 457-1

We acknowledge and support the need to provide safe, affordable, comfortable housing for a diversity of income levels, family sizes, culture and ages. Mike helped found a membership-based nonprofit called NEST (North East Seattle Together) designed to allow seniors to safely age in place in their own homes, with support from volunteers and trusted vendors.

We respectfully submit the following comments.

Seattle is made up of a number of distinct neighborhoods, each with its own unique identity and characteristics. Maple Leaf is an established neighborhood known for its quiet, leafy residential streets. It is bordered by Interstate 5 and includes several arterials (5th Ave NE, Roosevelt Way NE, 15th Ave NE, Lake City Way NE, NE Northgate Way). It is family-friendly and not too far from the urban center, though transit cuts have made it harder to commute by bus to downtown Seattle in a timely fashion.

Maple Leaf Neighborhood Center

We support adding corner stores, small businesses and small apartment buildings in neighborhoods, and we appreciate that per the Growth Strategy Summary, Neighborhood Center boundaries would be determined by further analysis and community feedback.

You used Maple Leaf in your plan as an example of a Neighborhood Center, but siting it at NE 90th St and Roosevelt Way doesn't meet the criteria per the One Seattle Plan FAQ. It doesn't have frequent transit. It isn't near everyday essentials such as grocery stores, pharmacies, libraries, banks, post offices, or most professional services – the four corners of its "commercial core" consists of a hardware store, a specialty toy store, a restaurant and a private school. The area already has multiple multifamily/apartment units. In fact, the recently completed, 5-story Maple Leaf Apartments is now leasing its 69 units, though regrettably they

are market-rate+.

The proposed circle for higher density of up to 5-6-story development interrupts the 12th Ave NE Greenway, defined as a "safer, calmer neighborhood street where people walking and biking are the priority." This is especially concerning given the circle includes the stretch north of Maple Leaf Reservoir Park, which is a veritable promenade route for pedestrians, kids on bikes, dog walkers, etc.

457-1 cont

Non-arterial streets in the proposed circle are narrow and density of the scale proposed would block the sun, reduce the tree canopy and associated animal life, block air flow and create concrete canyons that would destroy the character of the neighborhood and the very reason people want to move to Maple Leaf.

A better site for a Neighborhood Center would be at either Maple Leaf's south end (near Lake City Way and NE 80th St) or closer to Northgate at the north end of the neighborhood. Either location has better access to transit and services, and the ability to scale up new residential buildings without adversely affecting the smaller, quieter streets.

In addition, the proposed 20+block circle is overly broad for the 5-6 story buildings the plan recommends as appropriate for the area. You can see on the aerial photo of Maple Leaf that you used in your presentation that the blocks around NE 90th St and Roosevelt Way NE are thick with mature trees. We will talk further about trees below, but for a city whose goal is to increase its shrinking tree canopy, it makes no sense to cut down mature trees that are making a significant contribution. The Neighborhood Center development zone should be modified to be a quarter-block from the main arterial along Roosevelt.

If the final version of the plan does not modify the size of the circle, then development beyond a quarter-block from the main arterial should be limited to buildings of 2-3 stories to better fit the character of the neighborhood.

RECOMMENDATIONS: Re-site Maple Leaf's Neighborhood Center. Modify the circumference to a quarter-block on non-arterials. Limit density beyond a quarter-block on non-arterials.

Affordable housing

We support the need for ample, diverse housing, particularly the need to expand affordable housing, citywide. But we don't see any data re: how many affordable units will be produced under this plan, aside from noting the affordable housing bonus to allow 6 units if 2 are affordable to low-income households.

457-2

The plan doesn't require developers to take part in the city's Mandatory Housing Affordability program, and we understand planners are concerned that including that requirement won't

pencil out for builders. Please take a closer look at that. And please don't exempt developers from design review in exchange for promises of affordable housing – then we'll just get ugly, shoddy affordable housing – hardly equitable for a population that most needs equity.

The DEIS executive summary's section on Population, Housing & Employment states that all alternatives will increase income-restricted and affordable market-rate housing by increasing housing supply. Where does this assumption come from? Please amend the DEIS to cite sources for that conclusion, and provide an estimate of how long it takes for increased housing supply to filter downward to become affordable at less than 60% area median income for renters and 80% AMI owner-occupied.

457-2 cont

We are not seeing lower prices in our neighborhood. Maple Leaf single-family homes are each being replaced with 3 large townhouse/ADU/DADU units, each of which sells for $800,000-$1.3 million. Hardly affordable. The plan considers apartments to be affordable alternatives but our neighborhood's newest apartment building calls itself luxury housing and is renting units for $1,800 for a 400-SF studio to $3,100 for 2 bedrooms. Only 2 of the 69 units in the 5-story building are 2 bedrooms, which doesn't encourage families. On the other end of the spectrum, at least one Lake City Way building designed to rent for 60% AMI is having trouble finding tenants because even that is too expensive for many families.

Also, please amend the plan to encourage social housing, land trusts and local decision-making authority to invest in affordable housing that meets the needs of the neighborhood. Give neighbors and local community organizations first dibs to bid on property for sale, ahead of regional or national developers.

RECOMMENDATIONS: Analyze and source supply/demand/affordability over time. Examine MHA. Encourage social housing.

Transit and parking

We love the concept of a 15-minute city where everything you need in daily life is but a short walk, bike trip or bus ride away. In retirement, we enjoy being able to walk to buy coffee, a light bulb or a math game for kids in our own neighborhood.

But bus service in Maple Leaf has been decimated in recent years. Caroline rode her bike to work downtown year-round for 15+ years, and took the (now defunct #77) bus when she couldn't cycle. Busing downtown in a timely fashion is no longer possible, given the region's decision to prioritize light rail over buses. Were Caroline still working, she'd either have to spend more of her day commuting (walk 20 minutes or take a local bus to Northgate, take light rail through the University District and Capitol Hill and eventually downtown) or choose to drive.

457-3

We also question the urbanist belief that most people don't need cars or off-street parking. Maple Leaf is the third highest hill in Seattle, and 13% of Seattle's population is 65 or older, forecast to grow by 75% by 2045, per the plan Housing Appendix. Citywide rezoning plans that depend on prospective improvements to a transit system not under the city's control must address the concerns of older people.

Being able to walk/bike/take Maple Leaf's very limited public transit is an aspirational goal for a limited, able-bodied portion of the population. It's unrealistic, discriminatory, humiliating, and isolating for older people, or people with disabilities or limited strength. Three people on our street alone use canes or walkers. In addition, the east side of Maple Leaf is very steep, which provides extra challenges for people with mobility issues.

457-3 cont

Maple Leaf now has only 2 local bus routes, neither of which goes downtown. The #67 runs along Roosevelt every 15 minutes (between Northgate and the U-District). The #73, which used to go downtown, was rerouted and now runs every 30-60 minutes along 15th Ave NE to the U-District. Bus service was removed entirely from the 5th Ave NE arterial several years ago, and the well-loved, peak-only #77 commuter bus downtown also was cut.

Given the city doesn't control Metro, it is disingenuous to add high density developments along assumed frequent transit routes, expecting that bus service will follow, when in fact we have been losing access to transit for years. We need better bus service before we redesign the city.

Parking also is an issue, and we are troubled by the lack of required off-street parking in the plan. On-street parking already is a premium in Maple Leaf, particularly around the Maple Leaf Reservoir Park and local restaurants and coffee shops. Modern cars don't fit in garages of older homes and not all homes have usable driveways. The new 69-unit apartment building on Roosevelt has underground parking but is charging $175 extra a month for a stall. Given that the monthly rents are so high, we predict that some people won't want to pay extra to park, and will opt to jostle for space on the street.

RECOMMENDATIONS: Site Neighborhood Centers near transit hubs. Address needs of older people. Mandate parking in residential redevelopment.

Tree preservation

We support the city's aspiration to achieve a 30% tree canopy, and note that coverage has shrunk in recent years, per the 2022 citywide review of tree canopy cover.

457-4

We believe more analysis of the effect of development on the tree canopy is needed for each proposed Neighborhood Center, and that the DEIS includes statements that either are irrelevant or not supported by facts.

The physical, mental and environmental benefits of preserving a healthy tree canopy are well-established, as are the adverse effects of losing trees.

Neighborhood Residential areas provided 47% of the tree canopy area in 2021, per the citywide review, and the Maple Leaf area has a moderate tree canopy cover of 25-40% (DEIS Exhibit 3.3-2 Plants and Animals). Proposed zoning changes in Neighborhood Residential areas increase lot coverage from the existing 35% to 50% and reduce front and rear setbacks, which would have a significant effect on plants and animals.

457-4 cont

Per the DEIS Plants and Animals Impacts section: "Projects that increase the area of individual parcels occupied by buildings and impervious surfaces would be expected to result in long-term (but localized) reductions in the diversity and/or abundance of plant and animal communities in the affected areas."

Furthermore, the DEIS examination of the Impacts of Alternative 2, which creates Neighborhood Centers, specifically warns of the effect of development in the proposed Maple Leaf Neighborhood Center at NE 90th and Roosevelt. It notes that due to the relatively high proportion of existing tree canopy in the area, development there could cause so much loss that it could prevent the city from achieving its tree canopy goal.

The DEIS concludes that none of the alternatives studied would be expected to have significant, unavoidable adverse impacts on tree canopy cover, in part due to new tree regulations and in part because a lot of development-related loss of canopy cover would be reversed "over time" as replacement trees grow.

That statement needs rigorous analysis given the lack of information on the effect of development and on the quantity of trees lost in each Neighborhood Center, the absence of acknowledging the decreased benefits of newly planted trees, and the use of the vague term "over time." There is a great risk of underestimating development-related canopy loss and overestimating canopy preservation due to regulations.

The DEIS further states that city development could help preserve trees regionally, which certainly cannot be proven given that other cities make their own density decisions. Likewise, stating that any decreases to plants and animals in the city of Seattle wouldn't affect numbers in the wild is irrelevant since the DEIS is not analyzing effects of development in the wild. Those statements are unsupportable and irrelevant and should be deleted.

In addition, the DEIS includes urban tree equity as a mitigation measure – namely, planting more trees in areas with disadvantaged populations. We support adding trees in those areas; it makes sense and it's the right thing to do from an equity standpoint. But cutting down

mature trees in other areas does not make sense, and does not balance the scale.

In short, the mitigation measures proposed are based on faulty assumptions and are not appropriate to the scale of the loss.

457-4 cont

RECOMMENDATIONS: Guarantee protection for large trees. Evaluate projected canopy loss for each Neighborhood Center. Define time needed for newly planted trees to achieve benefits of mature trees. Remove irrelevant and unsupported assumptions.

Thanks again for the opportunity to share our views. Please let us know if you have any questions about our comments. We look forward to further engagement.

Caroline and Mike Ullmann
8819 12th Ave NE
Seattle, WA 98115
carolineu@mindspring.com
mikeu1@mindspring.com
Land line: 206-517-8096

Letter 458

From: Skyler Urban
To: PCD_CompPlan_EIS
Subject: Comment Re: Comp Plan - More Housing Needed
Date: Monday, May 20, 2024 11:51:28 AM

CAUTION: External Email

Hello -

I write to submit a comment on the proposed Seattle Comprehensive Plan. I would like the city to pursue the Housing Abundance Map, i.e., the earlier Comp. Plan draft that was rejected by Mayor Harrell's policy team. 458-1

Since the 2021, my rent has increased year after year, and I expect it to increase again when I renew my lease. We need an ambitious plan to handle the housing crisis and cost of living crisis that go with a lack of housing. Only the abundant housing plan can turn us in the right direction, not the current comp. plan.

Thank you,

Skyler Urban.

Letter 459

From:	John Valett
To:	PCD_CompPlan_EIS
Cc:	Moore, Cathy
Subject:	Comment on Seattle's One Comprehensive Plan EIS
Date:	Friday, May 3, 2024 9:50:24 AM

CAUTION: External Email

This email is to serve as public comment on Seattles Comprehensive Plan Environmental Impact Statement.

459-1

1. Section P 3-3 states that "none of the alternatives would be expected to result in impacts reducing the likelihood of survival or recovery of a plant or animal in the wild." **How would Seattles comprehensive plan affect available standing habitat for Seattle's urban ecosystem and what impacts are created from the plan regarding landscape fragmentation and wildlife corridors?**

2. Section P 3-3 states that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." **What is the effectiveness of tree planting programs designed for tree replacement in preserving habitat and ecosystem functions? How does this impact Seattle's likelihood of achieving its canopy and climate goals set forth?**

3. The plan states that Seattle will make progress toward its 30% canopy goal. The new tree ordinance substantially reduces private land available for trees. **How does the emphasis on public land achieving canopy goals account for the fact that current assessments show that canopy in parks is declining? How much public land is available to reach the 30% goal? How many trees will need to be planted in these areas every year to make up for trees removed by development?**

The city's comprehensive plan is meant to serve the people of Seattle, and not sit in the pocket of the developers and its industry.

Best,
John Valett

Letter 460

From: Emily Van Bronkhorst
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 9:51:22 AM

CAUTION: External Email

Comments Planning and Community Development EIS,

460-1

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Emily Van Bronkhorst
emilyveebee55@gmail.com
4107 Wallingford Ave N
Seattle, Washington 98103

Letter 461

From: Luz Villasana
To: PCD_CompPlan_EIS
Cc: Rivera, Maritza
Subject: Environmental Impact Questions
Date: Saturday, May 4, 2024 9:53:27 PM

CAUTION: External Email

Hello,

I am concerned with the current proposal to increase housing in Seattle with regards to the urban forest and animals living within. 461-1

Specifically, in Section P 3-3, it states that “none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild.” However it does not spell out clearly how the plan will impact our city's plants and animals. I think this must be addressed.

This same section also claims that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." However it seems to me that there is an in depth analysis lacking that will show that all the plants removed and corresponding fauna affected by such removal will be adequately "substituted" with the tree planting programs. Can you "show your work" like they use to tell my kids in grade school? It's hard to imagine the increased hardscape will not have unavoidable adverse impacts on tree canopy cover.

Finally, how is it possible that Seattle will reach its 30% canopy goal when the new tree ordinance translates in a net reduction of private land available for trees? Is there really enough public land that grants the assumption that the 30% goal will be reached? Over the years we have seen how private developers (whether for buildings, townhomes or private residences) remove trees over and over again. How many trees have to die, how many old, established trees will be cut? Has this plan made an accurate prediction of how many trees will need to be planted in these areas every day/month/year to make up for the trees killed by the proposed development?

Let us not forget that green spaces in cities mitigate the effects of pollution and can reduce a phenomenon known as the urban heat island effect.

Please, save our urban forest!

Sincerely,

Luz Villasana

Letter 462

From: Michael Vitz-Wong
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Thursday, May 9, 2024 6:05:05 PM

CAUTION: External Email

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities. 462-1

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Michael Vitz-Wong
mike.but.not.just.mike@gmail.com
123 Palatine Ave N
Seattle, Washington 98103

Letter 463

From: Nils von Veh
To: PCD_OneSeattleCompPlan
Cc: Saka, Rob; EIS@seattle.gov; PCD_CompPlan_EIS
Subject: Input/ feedback on One Seattle Plan current draft
Date: Monday, May 6, 2024 4:49:16 PM

CAUTION: External Email

Greetings--

My partner Robyn Ramsey and I attended the Seattle Rezoning District 1 Info Session on April 29th in West Seattle. After reflecting on the information presented at that community meeting and reviewing the online information about the plan we have the following comments. 463-1

We are long-time Seattle residents and have been home owners for a good portion of our adult life. Seattle is at a major turning point in its existence and West Seattle residents recently also had a first-hand, front row seat at what happens when a major citywide medical emergency and a major West Seattle infrastructure crisis occurs simultaneously. And that also prompted us to imagine what might happen if there is a major earthquake in our area in the near future.

As we drove home from the presentation a week ago and as we have traveled around the city in the past week we have tried to imagine what the Seattle of the future might look like with four housing units built on many of the currently single family blocks we travel past. And it struck us repeatedly that we would not want to live in the city with the density proposed by this plan as it is currently proposed.

There is no question that we must take a creative look at trying to solve the homelessness crisis we are experiencing by providing more affordable housing options, but this plan would result in dramatically altering the unique character of our city that attracted us to live here in the first place. And has not really resulted in more affordable housing units in those new multiple unit rowhouses

If we are going to truly have a "comprehensive plan" it also needs to address the needs we will have in this denser, more populous city. That means more medical care facilities in all parts of the city. That means having an assurance that the basic infrastructure of the roads, bridges, energy grid, water supply, sewer systems and other critical parts of the infrastructure are

properly maintained and improved where needed.

The city has also just recently embarked on a dramatic, major plan to protect the existing tree canopy and additionally expand the tree canopy towards a 30% canopy goal. The impact of the higher density of the residential "urban neighborhoods" envisioned by this plan is not clearly taken into account. And it is not at clear how the goals of that tree canopy plan and this one will align.

463-1 cont

The Fauntleroy neighborhood (and adjacent neighborhoods) we live in are also significantly impacted by the ferry traffic growth of people traveling through our West Seattle neighborhood from nearby areas as people move to nearby places like Vashon Island and over to Kitsap County to escape the already existing density of our Seattle urban landscape. And there does not seem to be a well coordinated effort by Metro Transit, SDOT and WSF to coordinate handling impact of the traffic traveling through our neighborhood. This impact needs to be properly addressed in the EIS review of this One Seattle Plan.

We look forward to hearing more details about how this One Seattle Plan/ Comprehensive Plan evolves and develops.

Nils von Veh & Robyn Ramsey
9721 45th Ave. SW
Seattle, WA 98136

Letter 464

From: Sharon Wada
To: PCD_OneSeattleCompPlan; PCD_CompPlan_EIS
Subject: Comments for the One Seattle Comprehensive Plan
Date: Monday, May 20, 2024 7:01:28 AM
Attachments: FINAL-BCS-Comments-Draft-2024-Comprehensive-Plan-Update-and-DEIS.pdf

CAUTION: External Email

As a native Seattleite, I strongly support the thoughtful, science-based recommendations that Birds Connect Seattle submitted to your office (see attached). BCS is one of the oldest and most established conservation organizations in our great city, and it's imperative that your planning team listen to their credible advice and apply their input to the One Seattle Comprehensive Plan. 464-1

In my lifetime, Seattle has rationalized sacrificing trees and surrounding nature under the guise of "job growth" or "property owner rights" or "urban villages" or whatever the new spin is. We all know it means more clearcutting, more concrete, more congestion and a lower quality of life for all.

Seattle can be a leader in protecting what's left of our dwindling tree canopy, parks, habitats and the wildlife that depends on us. Our city leaders must be less focused on developers and their endless paper greenery, and instead, **care more about the dwindling natural greenery in our Emerald City.**

Your committee has the power and opportunity to preserve and restore health to our best assets. Please do the right thing before it's too late.

Sincerely,
Sharon Wada

From:	Sharon Wada
To:	PCD_OneSeattleCompPlan; PCD_CompPlan_EIS
Subject:	Comments for the One Seattle Comprehensive Plan
Date:	Monday, May 20, 2024 7:01:28 AM
Attachments:	FINAL-BCS-Comments-Draft-2024-Comprehensive-Plan-Update-and-DEIS.pdf

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In my lifetime, Seattle has rationalized sacrificing trees and surrounding nature under the guise of "job growth" or "property owner rights" or "urban villages" or whatever the new spin is. We all know it means more clearcutting, more concrete, more congestion and a lower quality of life for all.

Seattle can be a leader in protecting what's left of our dwindling tree canopy, parks, habitats and the wildlife that depends on us. Our city leaders must be less focused on developers and their endless paper greenery, and instead, **care more about the dwindling natural greenery in our Emerald City.**

Your committee has the power and opportunity to preserve and restore health to our best assets. Please do the right thing before it's too late.

Sincerely,
Sharon Wada

464-1 cont

Letter 465

From: Erin Wade
To: PCD_CompPlan_EIS
Cc: Hollingsworth, Joy; PCD_OneSeattleCompPlan
Subject: Save mature trees throughout Seattle
Date: Monday, May 6, 2024 4:12:23 PM

CAUTION: External Email

Your draft proposal on the environment (comprehensive plan and environmental impact statement) is bad for the environment and bad for people's health. Alternatives 2 and 4 would save the most trees, but your overall philosophy is wrong.
It would be beyond short-sighted to think that the negative effects of a mostly treeless high-rise dense city could be offset by trees growing miles away. Reasons include:

465-1

1-the suburbs are increasing dramatically as the increasing rents drive people out of the city, so that argument is false.
2-it takes decades for a tree to truly have an impact on the environment, cooling and protecting people from our increasingly hot summers, and housing wildlife, particularly birds, who need mature conifers in which to live and nest, for the most part. Species of birds are going extinct at an alarming rate across the country, and it is all our responsibility to protect the natural world, including wildlife and trees. Temperatures on the ground are less when mature trees exist within cities. Otherwise, heat islands are created, and with global warming, these trees could save human lives, as well. You are being short-sighted to a dangerous degree.
3-this city has become an increasingly unpleasant place to live, crowded with highrises, and the presence of mature trees in neighborhoods really makes a difference between reasonably tolerable and absolutely unbearable. Those kinds of conditions drive people further out past the suburbs into the exurbs, into forest areas themselves, rendering your arguments foolhardy and cynically false.
4- Plans for replanting trees quite often fail, as it takes considerable attention to raise a young tree successfully into a semi-mature tree. Vandalism, lack of adequate watering, and topping kills many young trees planted in neighborhoods. Non-native trees do not support native bees, among other issues, either.
5-If you reduce space for new trees, while removing mature trees due to development, Seattle will not ever be able to reach its tree canopy goals, which are not very impressive in the first place. You would be causing irretrievable damage to Seattle's environment and to its liveability, for both humans and wildlife, especially in the face of global warming. Humans do not have a moral right to destroy the environment.

Sincerely, Erin Wade

Letter 466

From: Christina Wagner
To: PCD_CompPlan_EIS; Morales, Tammy; Woo, Tanya
Subject: Seattle Comprehensive Plan Environmental Impact Statement
Date: Monday, May 6, 2024 2:58:04 PM

CAUTION: External Email

Hello Tammy Morales, Tanya Woo and to whom it may concern;
I am writing as a long time Rainier Beach resident to provide input on the Seattle comprehensive plan/Environmental Impact;
Please re-consider any EIS that does not specifically detail the impacts on our valuable urban birds and wildlife and plan for their protection. 466-1
Please make sure the alternatives chosen provide analysis of what the effect of increased buildings and accelerated tree removals will have on the urban tree canopy cover in terms of health(physical and mental), climate, wildlife benefits and stated goals of 30%.
What analysis is there that can consider carefully how loss of large urban trees with their valuable contributions can be replaced by smaller re-plantings and time needed for maturation?
Thank you for your careful consideration of these issues so important to the future livability of Seattle for all Generations (people and wildlife)!!
Sincerely,
Christina Wagner
10437-67th Ave South
Seattle,
WA 98178

Letter 467

From: Christina Wagner
To: PCD_CompPlan_EIS; Morales, Tammy; Woo, Tanya
Subject: Re: Seattle Comprehensive Plan Environmental Impact Statement
Date: Wednesday, May 15, 2024 7:04:48 AM

CAUTION: External Email

Resending by new deadline of 5/20 as received newsletter of Tammy Morales that indicated some comments not received due to technical issues.

467-1

On 05/06/2024 2:57 PM PDT Christina Wagner <cmwzia@comcast.net> wrote:
Hello Tammy Morales, Tanya Woo and to whom it may concern;
I am writing as a long time Rainier Beach resident to provide input on the Seattle comprehensive plan/Environmental Impact;
Please re-consider any EIS that does not specifically detail the impacts on our valuable urban birds and wildlife and plan for their protection.
Please make sure the alternatives chosen provide analysis of what the effect of increased buildings and accelerated tree removals will have on the urban tree canopy cover in terms of health(physical and mental), climate, wildlife benefits and stated goals of 30%.
What analysis is there that can consider carefully how loss of large urban trees with their valuable contributions can be replaced by smaller re-plantings and time needed for maturation?
Thank you for your careful consideration of these issues so important to the future livability of Seattle for all Generations (people and wildlife)!!
Sincerely,
Christina Wagner
10437-67th Ave South
Seattle,
WA 98178

Letter 468

From: wwaldmanmd@starpower.net
To: PCD_CompPlan_EIS
Subject: trees
Date: Tuesday, April 9, 2024 3:39:22 PM

CAUTION: External Email

however the comprehensive plan gets written protection for old trees is a necessity.....no more millions dollar developments with 2 dollar trees

468-1

From: wwaldmanmd@starpower.net
To: LEG_CouncilMembers; PCD_CompPlan_EIS
Subject: trees
Date: Sunday, May 5, 2024 12:40:52 PM

CAUTION: External Email

- I hope you all will asap:
    - Amend the Tree Protection Ordinance to require developers to maximize the retention of existing trees 6" DSH and larger.
    - Give SCCI Director the ability to ask for alternative site designs to save trees.
    - Support building higher and building attached units to allow for tree retention and planting areas like Portland, Oregon has with 20% areas for multifamily and 40% for its 1-4 unit family zone.
    - Amend Tree Protection Ordinance to require ordinance to apply to all city land use zones.
    - Remove the "basic tree protection area" loophole in the Tree Protection Ordinance that allows developers to unnecessarily remove almost all large trees on lots.
    - Require developers to submit a Tree Inventory
    - i thank yu in advance.....wm waldman

468-1 cont

Letter 469

From: iwall@serv.net
To: PCD_CompPlan_EIS
Cc: Strauss, Dan
Subject: Comments on DEIS for the One Seattle Plan
Date: Saturday, May 4, 2024 2:49:28 PM

CAUTION: External Email

1. The estimated housing needs are based on the notion that no household should have to spend more than 30% of their income on housing and basic utilities. Has the city of Seattle adopted this aspirational objective in any official way (resolution, ordinance, charter)? What legal mechanism requires the city to accept this as a goal for the CP growth strategy? Note that King County uses 40% as a more realistic share of income for housing. The Dept of Commerce acknowledges that the 30% measure does not apply to home buyers. This is a major policy question that is not analyzed in the DEIS but forms the basis for the potentially exaggerated housing demand estimates. 469-1

2. The Housing Appendix includes tables purporting to show the net new housing units by neighborhood for each of the DEIS alternatives. However, using Greenwood/Phinney as an example, the differences across the alternatives are negligible for both housing and jobs. How is this credible given the differences in the alternatives and the expansion of boundaries and zoning changes anticipated by the "centers" concept? Please explain the methodology behind these estimates.

3. The No Action alternative meets the GMA/KING COUNTY requirements to produce the 80,000 new housing units and the updated development capacity report estimates a capacity under existing zoning to almost double that number. What is the justification for selecting any alternative to reach 100,000 or more net new housing units? What new code requirements will need to be enacted to meet the housing needs of households between 0 and 50% AMI, since theses low income HH represent close to half of the projected future housing needs?

4. The FEIS should include an estimate of the net new housing units that can now be created under HB1110 and the type of units (townhouses, flats, cottages) and occupancy status, i.e., rental, owner, congregate/shared housing. The estimates should recognize that nearly half of the parcels with NR 1 zoning are less than 5,000 SF.

5. The DEIS claims that existing regulations are adequate to mitigate all environmental impacts however this has a hollow ring to it given the clearly observable impacts of a growing population on energy demand, water supply, surface water quality, tree canopy, air quality (more VMT and congestion) and public safety. How will the environmental impacts of becoming a city of one million people be tracked and addressed over the timeframe of this plan? 469-2

6. The DEIS does not address the socio-economic impacts of the Growth Strategy. The FEIS should include an analysis of the public costs for infrastructure (parks, transportation, energy, drainage, wastewater, solid waste) to meet growth demands. How will increasing utility rates and property taxes under the anticipated zoning changes affect affordability for property owners and renters including those on fixed incomes? How will increasing cost of living in Seattle drive all kinds of displacement, not only from those areas mapped as having high risk of displacement? What measures will be required to preserve existing 'naturally affordable' housing including small apt buildings, older duplexes, triplexes, and small commercial

buildings that provide space for the desired urban amenities in the "15-minute" neighborhoods? The FEIS should address these elements that effect livability and desired variety in the urban built environment. We already see the monotony of the townhouse/ rowhouse explosion and the dilution of design review. Which alternative will produce housing suitable for families with children, seniors, and people with disabilities?

469-2 cont

7. In the DEIS chapter on utilities, Area 1 is described as having significant drainage and wastewater deficits yet Area 1 is targeted for the greatest percentage of new housing under two of the alternatives despite the upgrades to accommodate this growth being called 'cost-prohibitive'. Please explain this seeming inconsistency. In the section on electrical power, the DEIS says that City Light has plans to accommodate 65,000 additional housing units. How does that relate to the Growth Strategy that calls for between 80,000 and 100,000+ housing units? Do we really have affordable capacity to meet future electrical energy demand? Recent news coverage suggests we do not given climate change impacts.

469-3

8. The DEIS suffers from the usual problems of these documents. It does not articulate the cumulative impacts of the growth strategy and assumes that each incremental change is not significant. Seattle risks becoming the frog in the slowly boiling pot!

469-4

Irene Wall, District 6

Letter 470

From: Galen Ward
To: PCD_CompPlan_EIS; PCD_OneSeattleCompPlan
Cc: Strauss, Dan
Subject: More family sized homes in Seattle
Date: Monday, May 20, 2024 12:14:14 PM

CAUTION: External Email

Hi,

I am a Phinney Ridge homeowner and a parent of two elementary school-aged daughters.

470-1

The current draft plan does not go far enough to create real housing options. We need more homes.

I strongly support adding family-sized apartment buildings throughout Seattle neighborhoods like my own.

My feedback:

1. Please **increase the Floor Area Ratio** (FAR) and **increase the height** for 4- and 6-plexes in residential neighborhoods. Increase FAR further if the homes are stacked.
    a. Small lots - even 3,000 sqft - in our neighborhoods should be able to accommodate four families in comfortably sized units.
2. Buildings in neighborhood centers should be taller and boundaries should expand a quarter of a mile more.
3. Add back the original neighborhood centers.

Thank you,
Galen Ward
Phinney Resident

Letter 471

From: Sarah Ward
To: PCD_CompPlan_EIS; PCD_OneSeattleCompPlan
Cc: Strauss, Dan
Subject: Draft housing plan - Seattle resident feedback
Date: Monday, May 20, 2024 4:16:55 PM

CAUTION: External Email

To Whom it May Concern:

As a homeowner in Phinney Ridge and a parent of two elementary school-aged daughters, I feel that the current draft plan falls short in providing adequate housing options. We need more homes. 471-1

I support the addition of family-sized apartment buildings across Seattle neighborhoods, including mine.

Here are my suggestions:
1. Increase the Floor Area Ratio (FAR) and height limits for 4- and 6-plexes in residential areas. Allow higher FAR for stacked homes.
2. Permit small lots, even as small as 3,000 sqft, to house four families in comfortably sized units.
3. Make neighborhood center buildings taller and expand the boundaries by a quarter mile.
4. Reinstate the original neighborhood centers.

Thank you,
Sarah Ward
Phinney Ridge Resident
6206 2nd Ave NW, Seattle, WA 98107

Letter 472

From: Sheila Warsinske
To: OneSeattleComplPlan@seattle.gov; PCD_CompPlan_EIS
Subject: Fwd: Affordable housing?
Date: Monday, May 6, 2024 1:36:56 PM

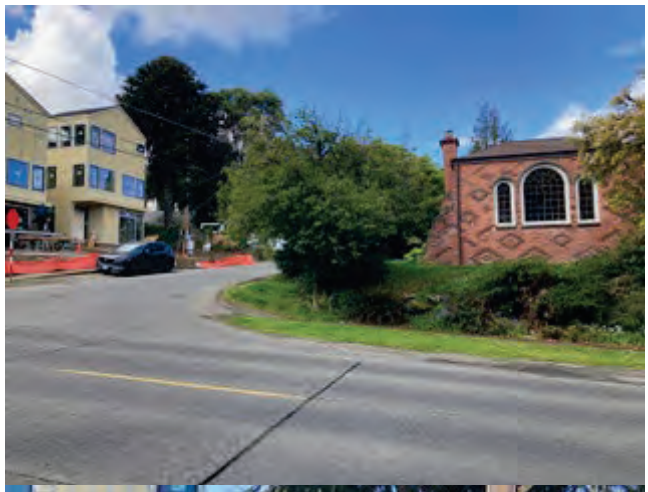
CAUTION: External Email

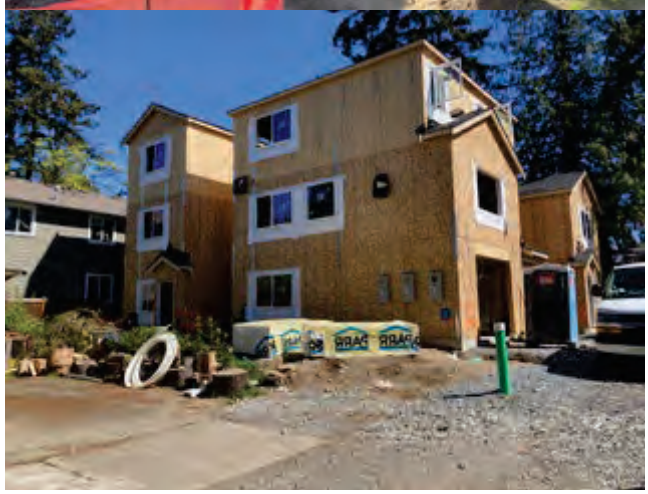
To: Whomever gets to read these emails. Apologies for duplicate emails. Responders suggested these emails instead.

472-1

Begin forwarded message:

From: Sheila Warsinske <lostislandlodge@comcast.net>
Subject: Affordable housing?
Date: May 6, 2024 at 7:47:57 AM PDT
To: "OPCD@seattle.gov" <OPCD@Seattle.gov>





Upper three photos - Six houses - on one lot - in Maple Leaf
Lower photo - Three on one lot. Please note proximity to home on the left .

Established statistics tell us that crime increases in densely populated areas. WE ALREADY HAVE MORE CRIME THAN CAN BE DEALT WITH in Seattle. Within weeks my empty, locked car was broken

into - $400. to repair, all around locked mail boxes broken into, a prowler tried to enter my back yard - deterred by locked gate, a deranged person damaged a considerable section of landscaping - and these are just little inconsequential crimes.
I see middle school children waiting for a bus on 90th & Aurora - with a scantily clad prostitute 6' away looking for customers, another one working the west side of the street, while on the south side of that intersection a cluster of people are doing drugs. What will happen when people are packed in even more than they are now?

Sheila Warsinske

472-1
cont

Letter 473

From: Sheila Warsinske
To: PCD_CompPlan_EIS; OneSeattleComplPlan@seattle.gov
Subject: Fwd: One Seattle Plan
Date: Monday, May 6, 2024 1:38:17 PM

CAUTION: External Email

Apologies if this is redundant - responses to my previous emails suggested these two emails instead.

473-1

Begin forwarded message:

From: Sheila Warsinske <lostislandlodge@comcast.net>
Subject: One Seattle Plan
Date: May 6, 2024 at 7:47:24 AM PDT
To: "OPCD@seattle.gov" <OPCD@Seattle.gov>

Dear One Seattle Planners

I am not opposed to increased housing in Seattle - but the proposed plans are very concerning to me If you would, please read more about the following:

1 Location
2 Density
3 Affordability
4 Design
5 Tree Canopy

Why are already crowded neighborhoods on the high density plans?
Why aren't wealthier, roomier neighborhoods - Broadmoor, Windemere, Laurelhurst, North Beach, Blue Ridge, Olympic Manor, Madison Park, Mt. Baker,

Seward Park, View Ridge, Madrona- being considered for Urban Centers, Urban Neighborhoods? Lack of public transportation might be an excuse - more bus routes could solve that issue.

Why are developers allowed to construct multiple houses on one lot with no concern regarding the negative effect on our neighborhoods? I recently walked through a site in Maple Leaf - SIX houses on one lot. Six feet between structures. The 1200 sq. ft. houses will be priced at $750-$800,000; the 2500 sq. ft. houses at $1,600,000. Affordable housing? Really? Trees gone, over built lots destroying neighborhoods, minimal parking space, reduced property value for the rest of the residents- where's the positive part of this?

473-1 cont

Nearer to me - three houses are being built on one very small back lot - and four on the front lot. Three stories tall, looming over, at a minimal distance, the homes on north , east and south sides. All sense of privacy is destroyed - in their homes and back yards. What about Seattle's tree canopy and restrictions on removing exceptional trees? In order to get a better price, the owner of the small lot, had three 'beyond exceptional' trees on his property line illegally cut down. Despite it being reported, eye witnesses and photos - the owner was fined a minimal amount and one 6' tree (now gone)was planted in a feeble attempt at the required landscape restoration.

Architecturally these high density houses are a blight on any neighborhood. The developer and his profit will be long one - no concern for having contributed to diminishing the quality of the neighborhood. I worked so hard to earn the money to buy our home and now am facing declining property value as these ugly, "crammed in " houses appear . Additionally these developers completely clear cut the lots, there may be plans for some landscaping but in reality little room is left for planting anything.

I am sending photos in an accompanying email to further illustrate my concerns.

I actually feel that my voice is "in the wind", that my and our concerns are futile. That

said - I do want to thank you for reading my email and hope that someone on the council will have taken seriously what I've said. I wonder how many of you live in the areas of proposed changes and how many of you live or are willing to live right next door to one of these multi storied houses. Sacrificing your privacy/peacefulness & value of your home for the greater good?

473-1 cont

Sincerely,
Sheila Warsinske

Letter 474

From: Carolina
To: PCD_CompPlan_EIS
Subject: Seattle's comprehensive plan
Date: Sunday, May 5, 2024 6:28:36 PM

CAUTION: External Email

1. I am writing to you to comment on the comprehensive plan - Seattle's comprehensive plan which has been released related to URBAN TREES and urban tree removal. 474-1

I believe, out of the five alternatives in the plan, alternatives 2 and 4 would save the most trees. I am asking you to choose alternatives 2 or 4 in the comprehensive plan so we can build 100,000 new homes while preserving our trees.

I also have questions: The environmental impact statement doesn't protect urban nature:

Section P 3-3 states that "none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild." **What is the impact of the plan specifically on Seattle's plants and animals?**

Section P 3-3 states that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." **What analysis shows that tree planting programs, coupled with increased hardscape, will compensate for lost urban forest?**

The plan states that Seattle will make progress toward its 30% canopy goal. The new tree ordinance substantially reduces private land available for trees. **How much public land is available to reach the 30% goal? How many trees will need to be planted in these areas every year to make up for trees removed by development?**

Regards.

Carol Wartman

Letter 475

From: Matthew Weatherford
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Wednesday, May 8, 2024 10:04:41 PM

CAUTION: External Email

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities. 475-1

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.
* We need more trees in seattle - especially in heat island areas - incentivize these plantings and follow up

Thank you for your consideration.

Matthew Weatherford
Matt.weatherford@pobox.com
2312 NE 113th St
Seattle, Saint Croix Island 91825

Letter 476

From: lassie webster
To: PCD_CompPlan_EIS
Subject: One Seattle Plan
Date: Monday, May 6, 2024 12:33:03 PM

CAUTION: External Email

To Whom it May Concern,

I believe we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS). 476-1

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
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* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Lassie Webster
2727 NE 91st Street
Seattle, WA 98115
lassiewebster@gmail.com

Letter 477

From: Lassie Webster
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 11:54:36 AM

CAUTION: External Email

Comments Planning and Community Development EIS,

477-1

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
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Thank you for your consideration.

Lassie Webster
lassiewebster@gmail.com
2727 NE 91st Street
Seattle, Washington 98115

Letter 478

From: Paul Weinstein
To: PCD_CompPlan_EIS
Cc: Moore, Cathy
Subject: Seeking Your Support to Protect Seattle"s Urban Tree Canopy
Date: Sunday, May 5, 2024 8:05:42 PM

CAUTION: External Email

Dear Councilmember Moore,

As a longtime resident of District 5, I am reaching out to express my concerns about the Environmental Impact Statement's lack of robust protections for our city's precious tree canopy. 478-1

While Section P 3-3 suggests minimal impact on Seattle's wildlife, I believe the public would benefit from greater transparency regarding the data and methods used to reach this conclusion. Providing access to this information would help foster trust and understanding among constituents like myself.

I also have reservations about the reliance on tree planting initiatives to mitigate the loss of mature urban forests. Although well-intentioned, saplings cannot provide the same ecological benefits as established trees for many years. We must be cautious not to irreversibly damage our green spaces in the short term.

Furthermore, I worry that the new tree ordinance's restrictions on private land planting, combined with our already unreached 30% canopy goal, may put undue pressure on limited public land resources. Has the city conducted a thorough assessment of the feasibility and cost of this approach?

Councilmember Moore, I believe that you share my love for Seattle's urban canopy and the countless benefits it provides our community. I kindly ask for your support in ensuring that our city's growth does not come at the expense of our environment and quality of life.

I would greatly appreciate any insights you could provide on how these concerns are being addressed. Your leadership on this critical issue is vital to preserving Seattle's green legacy for generations to come.

Thank you for your time and consideration.

Best regards,
Paul Weinstein
Seattle Resident

Letter 479

From: colleenmarcyw@gmail.com
To: Moore, Cathy; PCD_CompPlan_EIS
Subject: Environmental Impact statement lacks adequate protections for existing tree canopy
Date: Sunday, May 5, 2024 8:27:11 PM

CAUTION: External Email

Dear Council member Cathy Moore,

As a concerned resident of North Seattle's District 5, I am writing to express my serious reservations about the lack of protections for our city's existing tree canopy in the recently released Environmental Impact Statement. 479-1

First and foremost, I am troubled by the vague assertion in Section P 3-3 that the proposed plan will not significantly impact Seattle's plants and animals. Where is the concrete data to support this claim? Who conducted the studies, and what were their methodologies? The public deserves transparency and access to the scientific evidence that supposedly justifies this conclusion.

Furthermore, I challenge the notion that tree planting initiatives alone will adequately compensate for the loss of our mature urban forest. Newly planted saplings cannot provide the same ecological benefits as established trees for many years. Where are the displaced flora and fauna supposed to find habitat in the meantime? Once we lose our precious green spaces, they may be gone forever.

I also question the feasibility of reaching Seattle's 30% canopy cover goal, which we are already falling short of, given the new tree ordinance's significant reduction of available planting space on private land. Has the city calculated how many acres of public land would need to be dedicated to tree planting to make up for this deficit? Is there even enough suitable public land available?

Moreover, what is the projected annual tree planting rate necessary to offset the canopy loss from development? Is this figure realistically achievable within the city's budget and resources, year after year? I respectfully request a detailed, data-driven response to these critical questions.

Councilmember Moore, I urge you to prioritize the preservation and expansion of our urban tree canopy in all neighborhoods, on both public and private land. Trees provide irreplaceable benefits to our environment, health, and quality of life. We cannot afford to sacrifice Seattle's green legacy for short-sighted development.

Thank you for your attention to this vital matter. I look forward to your timely response and concrete actions to address these concerns.

Sincerely,

Colleen Weinstein
4112 NE 103rd Pl
Seattle, WA 98125

Letter 480

From: Jeff Weissman
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 5:43:47 PM

CAUTION: External Email

Comments Planning and Community Development EIS,

480-1

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
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Mitigation recommendations:

* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Jeff Weissman
jr.weissman@gmail.com
5222 Ivanhoe PL NE
Seattle, Washington 98105-2837

From: maggieweissman
To: PCD_CompPlan_EIS
Subject: Housing and trees.
Date: Monday, May 6, 2024 2:20:41 PM

CAUTION: External Email

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities and this can forestry.
* The draft EIS does not help the situation

481-1

In addition to the recommendations below I would ask that European cities be looked at for example. Copenhagen and cities in the Netherlands do a good job with density while still having tree canopy. My brother lives in the Netherlands do and I can attest to this.

Mitigation recommendations:

* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
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Thank you for your consideration.
Maggie Weissman.

Maggie Weissman
maggie.weissman@gmail.com
5222 Ivanhoe Pl NE

Seattle, Washington 98105
Sent from my iPhone
Maggie Weissman
Managing Broker, CNE
Windermere Referral
206.226.0543
Www .maggieweissman.com

From: Maggie Weissman
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 1:29:52 PM

CAUTION: External Email

Comments Planning and Community Development EIS,

482-1

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities and this can forestry.
* The draft EIS does not help the situation

In addition to the recommendations below I would ask that European cities be looked at for example. Copenhagen and cities in the Netherlands do a good job with density while still having tree canopy. My brother lives in the Netherlands do and I can attest to this.

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Thank you for your consideration.
Maggie Weissman.

Maggie Weissman
maggie.weissman@gmail.com
5222 Ivanhoe Pl NE
Seattle, Washington 98105

Letter 483

From: Lisa Westgard
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 1:14:34 PM

CAUTION: External Email

Comments Planning and Community Development EIS,

483-1

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

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Thank you for your consideration.

Sincerely, Lisa Westgard

Lisa Westgard
kailine94@hotmail.com
240 S. 198th St
Des Moines, WA, Washington 98148

From: Woody Wheeler
To: PCD_CompPlan_EIS
Subject: Fwd: DEIS comments
Date: Tuesday, April 30, 2024 2:55:22 PM

CAUTION: External Email

Plants and Animals Section

Protecting mature trees and other remaining native plant landscapes is key to Seattle's future as an attractive, livable city. The urban forest, including large evergreen and other mature trees on public and private lands, is an essential component of Seattle's green infrastructure. It provides a line of defense against climate change, as well as habitat for our city's rich but declining bird and wildlife populations. 484-1

Tree Canopy

According to DEIS "No appreciable impacts on regional populations of plants or animals… and a substantial portion of development-related reductions in canopy cover would be reversed over time as replacement trees grow and the potential for any such reductions would be limited by regulations that protect existing trees and require replacement of trees that are removed from private parcels."

This statement is overly optimistic and somewhat delusional when it comes to the devastating impacts that developments will have under a weak tree ordinance which the Seattle Times correctly characterized as "a chainsaw." Further, this statement makes the false assumption that a newly planted tree is an adequate replacement for a mature tree. The city's own urban forest management plan debunks this myth.

So does New York Times columnist and author Margaret Renkl, who wrote in her 4/28/2024 column "America's Urban Forests Deserve Protection: Newly planted seedlings can help, but with nowhere near the same effectiveness as mature trees." "But too few of us (including the city of Seattle) understand the crucial contribution that trees make in our cities and suburbs: cooling hot buildings, preventing storm-water runoff, improving air quality, pulling carbon out of the air and the like. Not even to mention the habitat—food, shelter, nesting sites—that trees provide our wild neighbors."

The DEIS claims were not substantiated. Current tree protections fall far short of the mostly ignored Seattle Urban Forestry Commission. Seattle is backsliding in its efforts to achieve our city's agreed-upon goal of 30 percent canopy by 2037. In fact, our canopy declined by 255 acres, the size of Green Lake, in the last five years.

As Renkl concludes and I agree "In rapidly growing cities (like Seattle), where even a robust plan for planting trees can't possibly keep pace with development, the preservation of existing trees would go a long way toward keeping the city livable for human beings as well as for wildlife."

Plant and Wildlife Populations

DEIS does not cite data nor does it provide data on specific impacts when it asserts that " The plant and animal species found in Seattle are widespread in the region; some are globally

abundant."

DEIS needs to do a more thorough, scientific assessment of Seattle's urban wildlife where dozens of bird and wildlife species are declining due to shrinking habitat. To conclude that "there will be no environmental impact to urban wildlife populations" after adding 100,000 housing units is ludicrous.

484-1 cont

As one exasperated tree advocate said recently "We can kiss the Emerald City goodbye if we continue to allow lots to be clear cut for development." Renkl added in her column "There are ways to preserve the trees on construction sites, of course, but spec-builders rarely bother." Of all cities, The Emerald City in the Evergreen State should be first to "bother!"

Woody Wheeler
Conservation Catalyst
P.O. Box 51151
Seattle, WA 98115
206-498-3553
www.conservationcatalyst.org

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To: PCD_CompPlan_EIS
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485-1 cont

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Woody Wheeler
Conservation Catalyst
P.O. Box 51151
Seattle, WA 98115
206-498-3553
www.conservationcatalyst.org

Bonnie Williams

Comments on DEIS Executive Summary Impacts April 27

Earth and Water

486-1

Agree increased hard surfaces, and storm water run off are concerns and removing trees and clear cutting without more preservation of trees on private property should be worked into the Comp Plan at 30% tree coverage goal. Mitigations fall short for trees and need improved higher canopy goal of 30%.

I notice that every time a new unit or units connect gas lines or sewer systems that neighborhood streets are dug up then patched over until 3 or 4 projects on a block can cause street damage (patches) to the point it needs resurfacing or replacing which is very expensive.

Air quality

Smoke is terrible from wild fires and tree loss is mitigation not mentioned Increase tree canopy to 30%.

Plants and Animals

Alt 3 broad (HB1110 has similar impacts because 4-6 units will be spread across Seattle) and Alt 5 combined "would likely result in the largest tree canopy loss due to lower density development in Neighborhood Residential zones". Reject Alt 3 and 5 based on tree loss.

Replacing older trees with new trees that take 30 years to grow 30 feet do not function to absorb storm water as older trees. Planting in right of way is not nearly as effective as trees need to be smaller there.

Rabbits are being seen for the first time in my Wallingford yard because they are being displaced with so much development Cute, but damaging to plants and they multiply quickly (how to get rid of them?).

Big influx of large trucks related to construction in neighborhoods and delivery vehicles that are gas or diesel and idle while delivering to pollute air.

Smokers for barbeques should be banned to emit smoke all day long and are toxic for neighbors breathing this air.

Energy

Expensive replacements for older homes converting from oil furnaces to electric are not mitigated.

Costly upgrades to connect electrical to so many more homes per lot not mitigated

April 27, 2024

Comments on DEIS Alternatives Executive Summary and overlap with Comp Plan

From: Bonnie Williams District 4 Wallingford

487-1

Regarding DEIS Executive Summary

Choose the No Action Alternative because the state mandated HB1110 is a required upzone. No other alternatives are needed. HB1110 should be considered the alternative of choice because the state requires Seattle to apply the legislation of Mandatory 4-6 units on all formerly single family lots across all neighborhoods outside urban villages depending on proximity to transit which creates massive capacity.

How much capacity in changing from commonly existing one home situation on a 5,000 square foot lot or smaller and increasing capacity to allow to 4-6 units per lot city wide? What are the impacts? How will concurrent infrastructure be met? Who will be at risk for displacement for 6 story apartments and retail surrounding new neighborhood centers and those ¼ mile from light rail and rapid transit?

Comp Plan Presentation to City Council March 11

Christa from the Mayor's office presented an overview to the Full City Council of the Comp Plan with Michael Hubner and Rico Quirindongo that was recorded on the Seattle Channel March 11, 2024.
The link is here:

https://www.seattlechannel.org/CouncilBriefings/?videoid=x1553837=38:07

Christa mentions in the recording that there are 160,000 units of building capacity without any up zoning. The Comp Plan plans for 100,000 units without considering what HB1110 does in opening up additional zoning capacity in the DEIS making the 4 expanded alternatives listed in the DEIS unnecessary to reach a goal of 80k to 100K unit capacity. The capacity created by HB1110 has not been studied so apparently the capacity of 160,000 is inaccurate without more study?

Up zone triggers suggested in the Comp Plan and Deis to be considered are:

Using an alternative from the DEIS focused, broad, corridor or combined

Frequent transit network bus lines across the city

Expanding capacity of 24 New Neighborhood Centers

HB1110 upzones anything within a ¼ mile of rapid transit or light rail.

All of these suggested ways to up zones need reducing or eliminating except to adapt to HB1110?

The other suggested alternatives and many ways to expand seem like excessive ideas that and will drive displacement. The DEIS needs to study impacts and capacity created by implementing HB1110. How the city can manage and provide the infrastructure needed to accommodate 4-6 units per lot required across the city? More thorough and transparent study in the DEIS of capacity projections and unique environmental impacts by implementing HB1110 alone. Council and the public need this capacity and impact information before any intelligent decision making by council should begin.

The state passed HB1110 legislation while the Seattle's DEIS was already underway. The DEIS and Comp Plan should include a history of 2019 upzones that was created through MHA and ADU/DADU legislation accounting for the additional development capacity that remains.

487-1 cont

The impacts of HB1110 requires focusing on keeping infrastructure concurrent with growth especially roads and sidewalks in the north end not just housing. Neighborhoods are not all the same, but, sadly, the city has gotten away from direct efforts to work with neighborhoods on rezoning. One size does not fit all.

The incentive is built into HB1110 for developers as they get two extra units by making them affordable. Withdraw the extra floor height bonus for builder incentive for HB110. The heights and scale of six plexes should be compatible in older established neighborhoods

Impacts resulting from MHA and ADU/DADU upzones predict future impacts across neighborhoods

The impacts of new development, since 2019, have resulted in higher property taxes, more people being displaced due to demolition of older properties, loss of affordable rentals, and the necessity of businesses to relocate out of older established neighborhood business districts to make way for new large apartment or office buildings. Many service businesses such as paint, hardware, and plumbing, roofing, electrical, dry cleaning businesses have left. Restaurants have come in instead.

Mayor Harrell just announced a property tax increase for a 1.3 billion transportation levy for infrastructure. Developers should be paying impact fees, but the levy raises property taxes if passed.

Additional neighborhood impacts include construction noise, very large noisy heavy truck and trailer traffic hauling construction related equipment traveling through Wallingford neighborhood streets. Detours at the base of Stone way due to the storm water project has caused noticeably much louder truck traffic noise, detours for two years. Contractors post no parking signs for weeks at a time when building on any given block for weeks at a time. Many triplex projects are under construction for about a year and neighbors endure inconveniences. Streets are repeatedly torn up for utility connections for each new addition to a block until the project is complete. Construction is ongoing. Major streets with increased truck traffic are getting very beat up and patched for each new project. Lots clear cut of trees.

A proposal for 24 new Neighborhood Centers and is a big proposal.

I question the compatibility of mixing 4-6 story apartment buildings without parking and street level retail without parking. The proposal includes a trade off to up zone a 2-4 block radius of moderate family homes to be replaced by 4-6 story apartment buildings. The proposal goes too far as it is not tailored to

each neighborhood. Some small businesses already exist in the targeted areas for new neighborhood centers. Some already have corner stores. Working with the neighborhood specifically is required. One size fits all is a mistake which includes a blanket 2-4 block circular rezone around a core intersection. The DEIS should have provided links to current zoning maps so people could be more informed of what properties might be targeted in the expansion plans. Too vague a concept to reply with informed feedback.

487-1 cont

Some people will walk, some businesses will draw people in cars from nearby and other areas of Seattle.

We have Amazon and many delivery services that go door to door. The retail business climate is experiencing a lot of crime. The police are too short staffed to be effective in this crime spree. The idea that most will walk or bike to use these services and stay in their neighborhood is idealistic. Neighborhood stores are often not price competitive.

.

Bonnie Williams

District 4

Noise

Reduce hours of construction on Sunday in neighborhoods and allow no construction noise on Sundays

Reduce size of trucks, trailers, construction equipment trying to squeeze through neighborhood streets

For people on busy streets large semi trucks hauling containers are speeding and they are extremely noisy passing through neighborhoods (stricter truck routes for semis and trailers).

487-1 cont

We have Metro buses and Microsoft buses they contribute to noise and pollution especially if increased frequency.

Land Use

Loss of privacy with taller townhomes next to lower smaller older home and shorter setbacks

Arched roofs as compared to flat roofs cast less shadow from town homes on neighbors with solar panels . I suggest better roof designs on these taller buildings for protecting adjacent neighbor's solar panels.

Greater building bulk and heights definitely does decrease views of the city and protection of views is not happening nor are there good transitions from higher to lower building heights as promised.

Tree loss is horrifying and the tree legislation from 2023 unless changed will continue to create heat islands.

Unless the legislation goes to at least 30% canopy goal and OPCD ensures more lots are not clear cut.

Population housing and employment

"Alternative 3 spreading housing across the city would result in the highest level of renter displacement due to a higher ratio of homes demolished to new homes built". HB1110 is closer to the "broad alternative 3" as both spread growth throughout the city so I conclude that Hb1110 would also result in the highest level of renter displacement. However, Hb1110 is likely to result with subdivisions of 5,000 square foot lots and homes for sale rather than rentals. Alternate 3 would be a bad choice because there is no way to justify that any alternatives will reduce displacement pressure because of increased production of affordable homes. Most of HB1110 will be market rate homes not "affordable" and that is unsubstantiated for either Hb1110 or any alternatives.

Mitigation to produce more affordable homes through implementing MHA developer fees for opting opt or providing units on site should be implemented. I recommend higher fees and more on site through city council review to strengthen the plan.

Cultural Resources

I believe preservation of historic landmarks and historical neighborhood honorary designations should be encouraged and contiguous areas of historic homes celebrated and shared through educational events , walks. I agree funding should be provided for additional historic surveys.

Yes I agree " Modify demolition review process so that historic review occurs even if SEPA thresholds are increased.

Transportation

Safety on public transit is priority and east west connections to light rail improved.

Prioritize moving cars efficiently over walking, biking while adding improvements for all.

Include maintaining Aurora as a major highway two lane without bike lanes, there are other safer routes for bikes ,scooters.

487-1 cont

Public Service

Prioritize adding police and fire protection staffing and equipment to be concurrent with growth.

Parks are overcrowded on sunny weekends in Seattle and some overcrowded all the time. They need to be safe and clean from homeless encampments and drug needles.

Building homes without yards and green space for child play and adult recreation is a resource on private property going away with many new housing types. You do not have to escape to a park if you have a yard.

Green streets should not be permanent and In Wallingford and Phinney. These streets prevent people from getting to small businesses without detours in cars. They are not used heavily enough to justify their existence. They should reopened and signs removed. In some areas of the city, it may be different, but here you see no one hardly using them as intended.

Utilities

"All alternatives have the potential to stress utility systems. "No real mitigations offered. It takes money and infrastructure and who will pay? Why not developer impact fees? Why a levy by the Mayor to raise property taxes for these impacts? Area 1 and 2 where I live will be most impacted by demand for water, electricity, wastewater, stormwater collection. Alt 5 has the greatest impact so avoid alt 5.

Letter 488

From: charles williams
To: PCD_CompPlan_EIS
Subject: EIS
Date: Sunday, May 5, 2024 10:26:45 AM

CAUTION: External Email

I live near Green Lake park, and seeing the number of visitors, families and children, that visit is a clear indicator that voting citizens want and need more trees in their own neighborhoods

488-1

I favor Alternative 2 for the EIS, as it will preserve the most canopy cover and limit the removal of established trees.

> Saying that "none of the action alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." is not backed up by facts but speculative at best. The new tree protection ordinance increases the potential for tree removal and loss in several ways. One is that all the zones that can undergo development under the ordinance state that the newly defined "basic tree protection area cannot be modified" despite Portland, Oregon and the Northwest Society of Arboriculture saying it can be modified to save trees. This and current guaranteed lot coverage of 85 - 100% for multifamily lots and above and rezoning to occur in the Neighborhood Residential zone means more trees, especially large ones, will be removed.

Charles Williams
District 6
>

Letter 489

From: PAMELA WILLIAMS
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 7:03:09 AM

CAUTION: External Email

Comments Planning and Community Development EIS,

489-1

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

PAMELA WILLIAMS
pwilltrav@aol.com
1912 30th Ave. S.
Seattle, Washington 98144

DEIS StoryMap Comment

Name: Tony Williams

Email: tmaxx98225@yahoo.com

Date: 5/3/2024

Comment:

490-1

My housing questions for the Comp Plan DEIS (due Monday 5 pm):
1) Where is the definition of affordability that's used in the DEIS? It's often said that you can't manage what you can't measure. Without a clear definition, the City has nothing to measure against.
2} If the Plan says it implements HB 1011, and the definition of affordability in HB 1011 is clearly stated at less than 60% of AMI for renters and less than 80% of AMI for owner-occupied, why isn't this statewide definition in the Plan?
3) In the DEIS Executive Summary, the objective for affordability is: "Increase the supply of housing to ease increasing housing prices cause by limited supply and create more opportunities for income-restricted housing." Where is the evidence that this dependence on supply-side, trickle-down housing works, or that it has worked to reduce housing costs to a level affordable to low-income people, during the past 5 to 10 years of the most extreme increases in supply of rental housing ever experienced in Seattle?
4) If you exclude fanciful supply-side housing promises, what is the likelihood that this plan will result in affordable low-income housing provided by the market?
5) Do you agree that given the state definition of affordability in HB 1110, that no new for-profit housing will be affordable without subsidies? Where does the DEIS acknowledge this?
6) Do you agree that given the state definition of affordability in HB 1110, no new market-rate townhouses are affordable to households with incomes less than 80% of AMI, without subsidies and income restrictions? Do you agree that townhouses are the predominant form of new housing being permitted in formerly single-family zones?
7) Although HB 1110 allows duplexes, triplexes, fourplexes, sixplexes, stacked flats and courtyard apartments, what is the likelihood that any of these Middle Housing forms will be built by current for-profit infill developers, when these builders refuse to build rentals of any sort? If these forms are meant to produce rental apartments in formerly single-family neighborhoods, and non-profits have told the city that they can't build there either, because they need economies of scale for construction and staffing, where are the programs or zoning incentives Urban Residential neighborhoods?
8) What is the environmental impact of continuing to lose 1.7% of our tree canopy every five years, when 70% of our tree canopy and most of the loss is in formerly single-family neighborhoods?
9) Where does the plan acknowledge that planting new trees takes 20-30 years to provide tree canopy, to shade houses, or to combat heat islands?

Letter 491

From: Kevin Wilmot
To: PCD_CompPlan_EIS; LEG_CouncilMembers
Subject: Comment on DEIS
Date: Monday, May 6, 2024 9:08:40 AM

CAUTION: External Email

Please note my comment on the DEIS:

1: Section P 3-3 states that “none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild.” What is the impact of the plan specifically on Seattle’s plants and animals?

491-1

2: Section P 3-3 states that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." What analysis shows that tree planting programs, coupled with increased hardscape, will compensate for lost urban forest?

3: The plan states that Seattle will make progress toward its 30% canopy goal. The new tree ordinance substantially reduces private land available for trees. How much public land is available to reach the 30% goal? How many trees will need to be planted in these areas every year to make up for trees removed by development?

Sincerely,
Kevin W.

Sent from my iPhone

Letter 492

From: Marian Wineman
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 12:24:13 PM

CAUTION: External Email

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities. 492-1

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Marian Wineman
mwineman@comcast.net
3611 45th Ave W
Seattle, Washington 98199

Letter 493

From: Melody Winkle
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 6:44:36 AM

CAUTION: External Email

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities. 493-1

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
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* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Melody Winkle
mwinkle@gmail.com
2518 NE 92nd St
Seattle, Washington 98115

From: Fritz Wollett
To: PCD_CompPlan_EIS
Subject: Growth
Date: Wednesday, May 8, 2024 7:11:13 AM

CAUTION: External Email

Alternative plan 2 is my choice because it allows for the most tree and plant habitat while pursuing reasonable growth and density. Thank you.

494-1

Fritz Wollett
7340 24th Ave. NE
98115

DEIS StoryMap Comment

Name: Ginger Woo

Email: gmwoo.lj@gmail.com

Date: 4/13/2024

Comment:

The city should study the impacts of citywide elimination of parking minimums. Of the available alternatives, I strongly prefer Alternative 5 with higher growth targets.

495-1

DEIS StoryMap Comment

Name: James Wu

Email: notify@james.analogist.net

Date: 5/5/2024

Comment:

1. Section 3.2.2 and Appendix D of the DEIS describing Impacts of GHGs under Alternatives 1-5 scenarios seems to have simply scaled the population size to derive the inputs of VMT Data, with the rest of the variables being held constant or just defaulting to a single set of assumptions relying upon default "Kings County" (misspelled in DEIS Appendix D) data in order to run the EPA Motor Vehicle Emissions Simulator. Is this a correct reflection of the MOVES modeling framework described under Appendix D?
2. The possible modeling methodology described in #1 appeared to have led to the erroneous conclusion that Alternative 1 leads to the lowest GHG impact and Alternative 5 the most, which is an assumption that simply does not pass muster of how GHG pollution in suburban development patterns work and is a simulation that fails to reflect the reality of GHG emissions, as can be seen in any European city development vs an US city of equivalent population and size. This means the modeling methodology is misleading and does not inform reality. Has the City studied the impact of GHGs as an accumulative pollutant, with less urban development directly leading to a complete regional change in VMT patterns that causes exurban and suburban supercommutes that directly change the VMT patterns per regional resident?
3. If a 15-minute bus commute is transformed into a 90-minute regional exurban vehicle commute originating from outside of Seattle bounds into Seattle as a result of lack of affordable housing within Seattle, global and regional GHG emissions rise and is directly attributable and changable as other sources of Core vehicle emissions. Does the DEIS Core Emissions incorporate a model of emissions source attribution that correctly reflects reality, that counts displaced and expanded emissions as being something long range planning is directly responsible for?

496-1

Letter 497

From: Cynthia Young
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 9:54:52 AM

CAUTION: External Email

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

497-1

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
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* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Cynthia Young
pearl206@aol.com
1523 NE 98th ST
Maple Leaf in North Seattle, Washington 98115

From: Steve Zemke
To: PCD_CompPlan_EIS; PCD_OneSeattleCompPlan; LEG_CouncilMembers
Subject: Please add these 3 polls to the public comment on the draft One Seattle Comprehensive Plan and draft EIS
Date: Monday, May 6, 2024 2:28:40 PM

CAUTION: External Email

Please add these 3 recent Seattle polls to public comment on the draft One Seattle Comprehensive Plan and the draft EIS. They provide valuable information of how those living in Seattle view the importance of trees and our Seattle urban forest.
Thanks,
Steve Zemke, Friends of Seattle's Urban Forest and TreePAC.

https://www.nwprogressive.org/weblog/2021/09/seattle-voters-overwhelmingly-favor-policies-to-protect-and-expand-the-citys-tree-canopy.html

Seattle voters overwhelmingly favor policies to protect and expand the city's tree canopy – NPI's Cascadia Advocate
In July of 2021, we teamed up with TreePAC to investigate support for a a range of sensible ideas for creating policy tools to protect trees. Majorities of over 75% and 80% endorsed every single one of our ideas.
www.nwprogressive.org

498-1

https://www.nwprogressive.org/weblog/2021/12/second-set-of-seattle-tree-protection-poll-findings-affirms-voters-value-urban-forests.html

Second set of Seattle tree protection poll findings affirms voters value urban forests – NPI's Cascadia Advocate
Respondents to NPI's October 2021 general election survey of the Seattle electorate are in strong agreement that the city should update its tree ordinance to strengthen tree protection policies, with more than seven in ten voters backing a majority of ideas tested.
www.nwprogressive.org

https://www.nwprogressive.org/weblog/2023/03/two-thirds-of-seattle-voters-concerned-about-tree-loss-with-housing-density-increasing.html

Two-thirds of Seattle voters concerned about tree loss with housing density increasing – NPI's Cascadia Advocate
68% of 651 likely February 2023 special election voters interviewed from January 26th-30th for NPI by Change Research said they were concerned about tree and canopy loss, while 30% said they were not. Only 1% were not sure.
www.nwprogressive.org

From: Steve Zemke
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS for One Seattle Comprehensive Plan
Date: Monday, May 6, 2024 4:45:11 PM

CAUTION: External Email

Seattle Office of Planning and Community Development
600 4th Ave, Floor 5
Seattle, WA 98104
May 6, 2024

Response to Analysis of Plants and Animals in Section 3.3 of the One Seattle Comprehensive Plan draft EIS - lot coverage issue and building will be different than in the past and result in greater loss of large and other size trees. Numbers are given of housing units anticipated to be built. How many more canopy acres over time will be lost based on building projections in each of alternatives?

Page 3.3.7 in the Draft EIS states "Notably, most canopy loss was not associated with development activities; only 14% of the canopy loss occurred on parcels that underwent development during that period.

499-1

This is based on a false methodology assumption used in the 2021 City of Seattle Tree Canopy Assessment Final Report.
"Methodology: To assess the impact of development (building) on tree canopy, the SAL team analyzed canopy changes on parcels that were redeveloped between 2017 and 202122 and compared them to parcels where no development projects were completed during this time. “Redeveloped parcels” were defined as sites that began and completed construction of new buildings that added residential units or new commercial buildings within the identified timeframe."
This is faulty methodology - compare it to number of housing units built in Seattle during this time period. Here is a CITY of Seattle chart on Development and Growth Information. Housing Units built are based on the year the project is completed, not projects started and completed in any 1 year or 5 year period. The same methodology should be used for tree loss. Look at canopy number on start of canopy period and end of period. Look at canopy loss on all projects completed in that 5-year period.
The actual canopy loss per project completed in the NR zone in the 2021 Tree Canopy Assessment was 39.8%. In multifamily the canopy loss per project was 49.5%.
The problem with comparing past loss to potential future loss is that zoning is going to change and the difference between single family housing units and ADU;'s and placing 4-6 units on what is now residential lots to the equivalent of multifamily lots is that a lot more lots will potentially have 4-6 plexes on them with even less room for trees. The LR zones right now are

guaranteed 85% development area of a lot and 100% lot coverage development area for MR, Seattle Mixed and commercial lots. **An analysis needs to be done based on projected building goals and projected canopy to be lost and what amount of tree retention and planting is required to increase canopy to 30% goal by 2037**. Goal needs to be increased afterwards if planting areas are available and more trees are retained rather than being removed. Climate resiliency, environmental equity, public health, ecosystem services, and sustainability suggest that efforts would be beneficial to maximize efforts to increase canopy area above 30% over time.

Steve Zemke TreePAC.org and Friends of Seattle's Urban Forest.

499-1 cont

Letter 500

From: Steve Zemke
To: PCD_CompPlan_EIS
Subject: Questions regarding One Seattle Comprehensive Plan draft EIS
Date: Monday, May 6, 2024 3:12:05 PM

CAUTION: External Email

- What is your estimation of planting needs and time frame to replace canopy lost during development (over 5 year periods as tracked by the city's canopy study)? The Tree Protection Ordinance refers to "tree replacement required shall be designed to result, upon maturity, in a canopy cover that is at least roughly proportional to the canopy cover prior to tree replacement." Would you agree that in most cases removing an 80 year old tree will take probably 80 years to replace?
- Is canopy replacement equivalence even possible with replanting since removed trees, which if not removed, would have increased growing according to scientific articles? It would appear that you've lost any canopy growth that would have occurred if the tree had not been removed.

How many acres are available and suitable for planting trees in each of the following public areas - the city's right of ways, Natural Areas and Developed Parks?

- How many trees and what size (small, medium and large size) will need to be planted in the city every year to make up for trees and canopy removed during development on lots?
- What is acreage is needed and available to plant trees on private property?
- When will it be possible to reach the 30% citywide goal?
- What potential is there for more than 30% tree canopy in Seattle over time?
- Is up to 40% canopy coverage, over time, as proposed in the previous Comprehensive Plan possible with intense planting?

500-1

- What is the projected loss in canopy volume over the next 20 years as big conifer trees and others are removed?
- Canopy volume, especially of coniferous trees during our rainy season, is a critical factor in reducing stormwater runoff, particularly in the rainy season in Seattle. Is their loss really possible to replace in a reasonable amount of time?
- What is the projected increase in stormwater runoff and what costs are associated with on site and alternative city water management policies of stormwater and pollutant runoff as a result?

As to commenting on other tree potential mitigation measures, add:

- Amend the Tree Protection Ordinance to require developers to maximize the retention of existing trees 6" DSH and larger through the whole development process, not just platting and short platting as required now. Existing trees are the survivors and are providing ecosystem services now.
- Give the SCCI Director the ability to ask for alternative site designs to save trees.
- Support building higher and building attached units to allow for tree retention and planting areas like Portland, Oregon has with 20% areas for multifamily and 40% for its 1-4 unit family zone. Zones like the industrial zone are allowed to remove all trees during development under the current ordinance.
- Amend the Tree Protection Ordinance to require the ordinance to apply to all city land use zones.
- Remove the "basic tree protection area" loophole in the current Tree Protection Ordinance that allows developers to unnecessarily remove almost all large trees on lots. It is not standard arboriculture practice according to the Northwest Chapter of The American Arboriculture Society.

500-1 cont

Steve Zemke for TreePAC and Friends of Seattle's Urban Forest

Letter 501

From: Steve Zemke
To: PCD_CompPlan_EIS
Subject: Comments on One Seattle Comprehensive Plan.
Date: Monday, May 6, 2024 4:13:33 AM

CAUTION: External Email

The following comment is in regards to legislation passed last year on Comprehensive Plan requirements

1. In the Climate and Environment Section, p 149, of the draft One Seattle Comprehensive Plan, the heading **Tree Canopy**, should be changed to **Urban Forest and Tree Canopy.**
2. Discussion - Seattle's **urban forest** and tree canopy is fundamental...

Rationale for adding urban forest is legislative amendments noted in text below. Highlighting is mine (SZ) for pointing out specific sections. Underlined areas are new to the 2023 legislation.

The Washington State Legislature in 2023 passed E2SHB 1181 - AN ACT Relating to improving the state's climate response through updates to the state's planning framework.

Section 1.(14) Climate change and resiliency. Ensure that comprehensive plans, development regulations, and regional policies, plans, and strategies under RCW 36.70A.210 and chapter 47.80 RCW adapt to and mitigate the effects of a changing climate; support reductions in greenhouse gas emissions and per capita vehicle miles traveled; **prepare for climate impact scenarios; foster resiliency to climate impacts and natural hazards; protect and enhance environmental, economic, and human health and safety; and advance environmental justice. ...**

501-1

Section 3.(3) The comprehensive plan of a county or city that is required or chooses to plan under RCW 36.70A.040 shall consist of a map or maps, and descriptive text covering objectives, principles, and standards used to develop the comprehensive plan. The plan shall be an internally consistent document and all elements shall be consistent with the future land use map. A comprehensive plan shall be adopted and amended with public participation as provided in RCW 36.70A.140. Each comprehensive plan shall include a plan, scheme, or design for each of the following: (1) **A land use element designating the proposed general distribution and general location and extent of the uses of land, where appropriate,** for agriculture, timber production, housing, commerce, industry, recreation, open spaces **and green spaces, urban and community forests within the urban growth area**, general aviation airports, public utilities, public facilities, and other land uses. The land use element shall include population densities, building intensities, and estimates of future population growth. The land use element shall provide for protection of the quality and quantity of groundwater

used for public water supplies. **The land use element must give special consideration to achieving environmental justice in its goals and policies, including efforts to avoid creating or worsening environmental health disparities.** Wherever possible, the land use element should consider utilizing urban planning approaches that promote physical activity and reduce per capita vehicle miles traveled within the jurisdiction, but without increasing greenhouse gas emissions elsewhere in the state. **Where applicable, the land use element shall review drainage, flooding, and stormwater runoff in the area and nearby jurisdictions and provide guidance for corrective actions to mitigate or cleanse those discharges that pollute waters of the state, including Puget Sound or waters entering Puget Sound.** The land use element must reduce and mitigate the risk to lives and property posed by wildfires by using land use planning tools, which may include, but are not limited to, adoption of portions or all of the wildland urban interface code developed by the international code council or developing building and maintenance standards consistent with the firewise USA program or similar program designed to reduce wildfire risk, reducing wildfire risks to residential development in high risk areas and the wildland urban interface area, separating human development from wildfire prone landscapes, and protecting existing residential development and infrastructure through community wildfire preparedness and fire adaptation measures.

501-1 cont

2nd change - In the Land Use Element General Development Standards:
Policies L.U.4.8 add underlined words.

Urban forest and tree requirements to preserve and enhance the City's physical, aesthetic and cultural character and to enhance the value of the trees and urban forest in addressing stormwater management, pollution reduction, climate resiliency and heat island mitigation.

Steve Zemke
Friends of Seattle's Urban Forest

Letter 502

From: Steve Zemke
To: PCD_CompPlan_EIS
Subject: Additional Comments on draft EIS for One Seattle Comprehensive Plan
Date: Monday, May 6, 2024 2:00:55 PM

CAUTION: External Email

Comments on draft EIS

- **P 3-3-29-30 Section on Climate and Environment** - Please analyze the potential environmental impact of the 5 options **on Seattle's urban forest and its plants and animals**. The urban forest is not just the canopy. Canopy area is only one measure of the urban forest. And all that is seemingly being looked at is canopy area but not also canopy volume. Some birds only live at the top of Douglas fir trees. Other birds live and nest midstory and others are in the understory. The understory from a plants and animal sense is part of the urban forest. The word understory does not show up in a word search of the Climate and Environment section. Canopy volume is important in helping slow or reduce rainfall which is a big factor in reducing pollution runoff into streams and Puget Sound and Lake Washington which affect salmon and Orca and other marine and freshwater life. Conifers are important for reducing stormwater runoff most in the winter when deciduous trees have no leaves. Our rainfall is highest in the winter and not the summer.

A word search of Climate and Environment Section (times mentioned) came up with: tree (237), canopy (187), urban forest (9), canopy area (1), canopy volume (0), bird (3 - migratory bird treaty), conifers (1), deciduous (1), native plants (0), native trees (0), small trees (0),medium trees (0), large trees (0), evergreen (0), deciduous (1), Douglas fir (0), western red cedar (0), big leaf maple (0), understory (0), street trees (6), park trees (0), insects (0), bees (0), pollinators (0). There are other words that can be also searched relevant to climate and the environment, but this is an indication that a lot of issues have been left out of the discussion and evaluation.

502-1

- **This is a Seattle EIS, not a regional or state EIS**. Saying "unlikely to result in appreciable impacts on regional populations of plants or animals"' and "none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild" is avoiding commenting on the specific impacts on Seattle plants and animals. Please respond to what will be the specific impacts to the urban forest in Seattle in Seattle, not" in the region" or "in the wild" or otherwise.

p 3-3-30 Saying that "none of the action alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." is also not backed up by facts but

speculative at best.

The new tree protection ordinance actually increases the potential for tree removal in several ways.

One is that all the developmental areas covered by the ordinance state that the newly defined "basic tree protection area cannot be modified" despite Portland, Oregon and the Northwest Society of Arboriculture saying it can be modified to save trees. The Tree Protection Ordinance SMC 25.11. 060 says the tree protection area can be modified by the Director in Section 25.11.060 and then in SMC 25.11.070 for NR and LR, MR, Seattle Mixed and Commercial Zones. it says that the "basic Tree Protection area" cannot be modified. This is a significant loophole that developers are using use to remove large trees and contrary to standard arboriculture practice in other cities. It was introduced at the last minute and appears to not have been completely understood as to its impact by the Council and the public at the time. This is an action that should be referenced in the potential mitigation measures.

502-1 cont

The current lot coverage of 85 - 100% for multifamily lots and above and rezoning to occur means more trees, especially large ones, will be removed. What is your estimation of potential canopy acreage loss (over 5-year periods consistent with the city's canopy studies) with increased development density in each alternative? The NR zone, following HB 1120, will result in a rezone we are told, probably next year allowing 4 plexes and six plexes in that zone which will significantly increase lot coverage.

Steve Zemke
for TreePAC and Friends of Seattle's Urban Forest

Letter 503

From: Tona Zubia
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 1:23:30 PM

CAUTION: External Email

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

503-1

Mitigation recommendations:

* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Tona Zubia
tonamolinazubia@gmail.com
1703 Bellevue Ave, B 102
Seattle, Washington 98122

Letter 504

From: Jûlina Zuluaga
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 3:26:33 PM

CAUTION: External Email

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

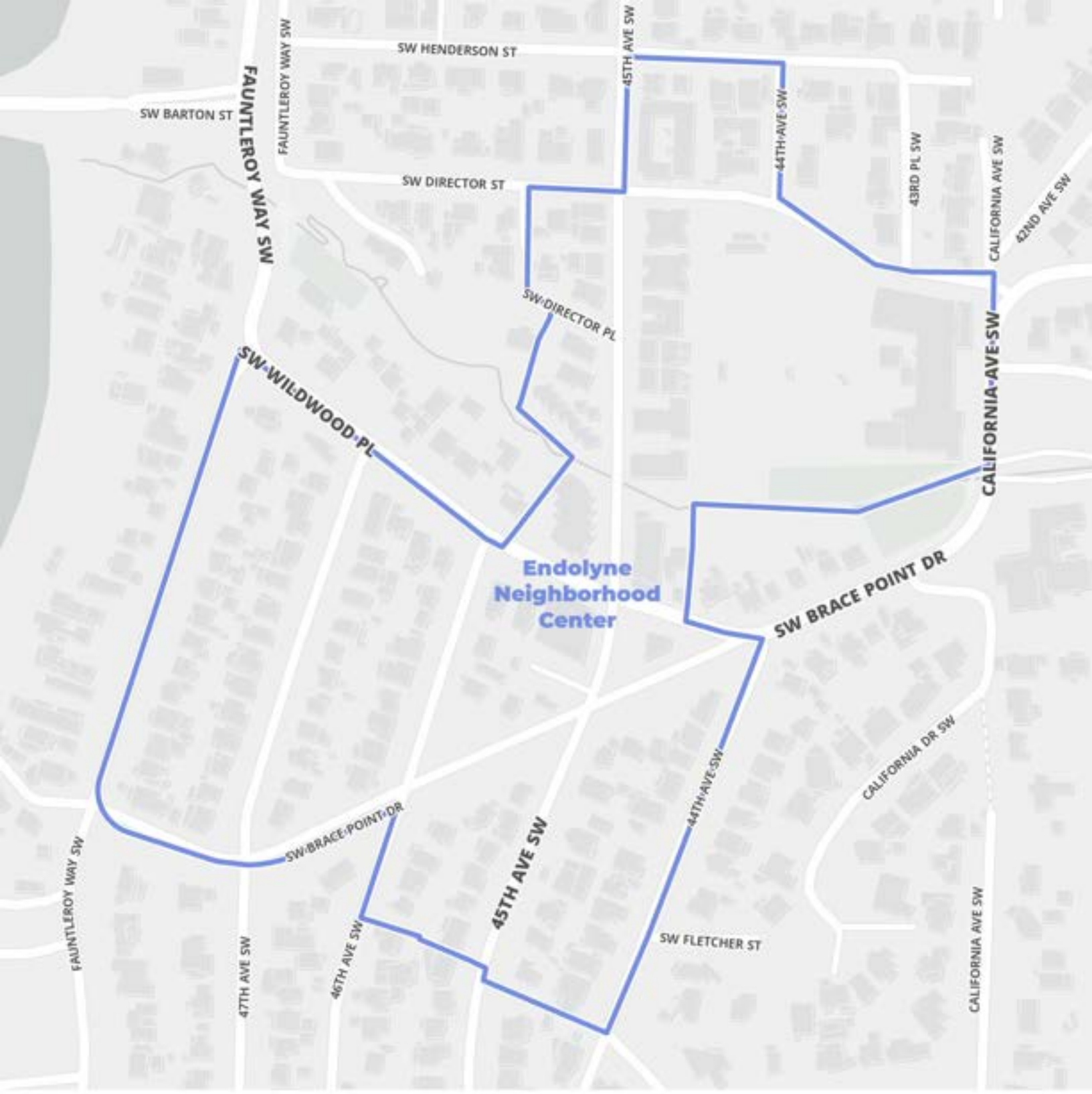
504-1

Mitigation recommendations:

* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Jûlina Zuluaga
zulianmu@gmail.com
433 belmont ave e
Seattle, Washington 98102



Endolyne

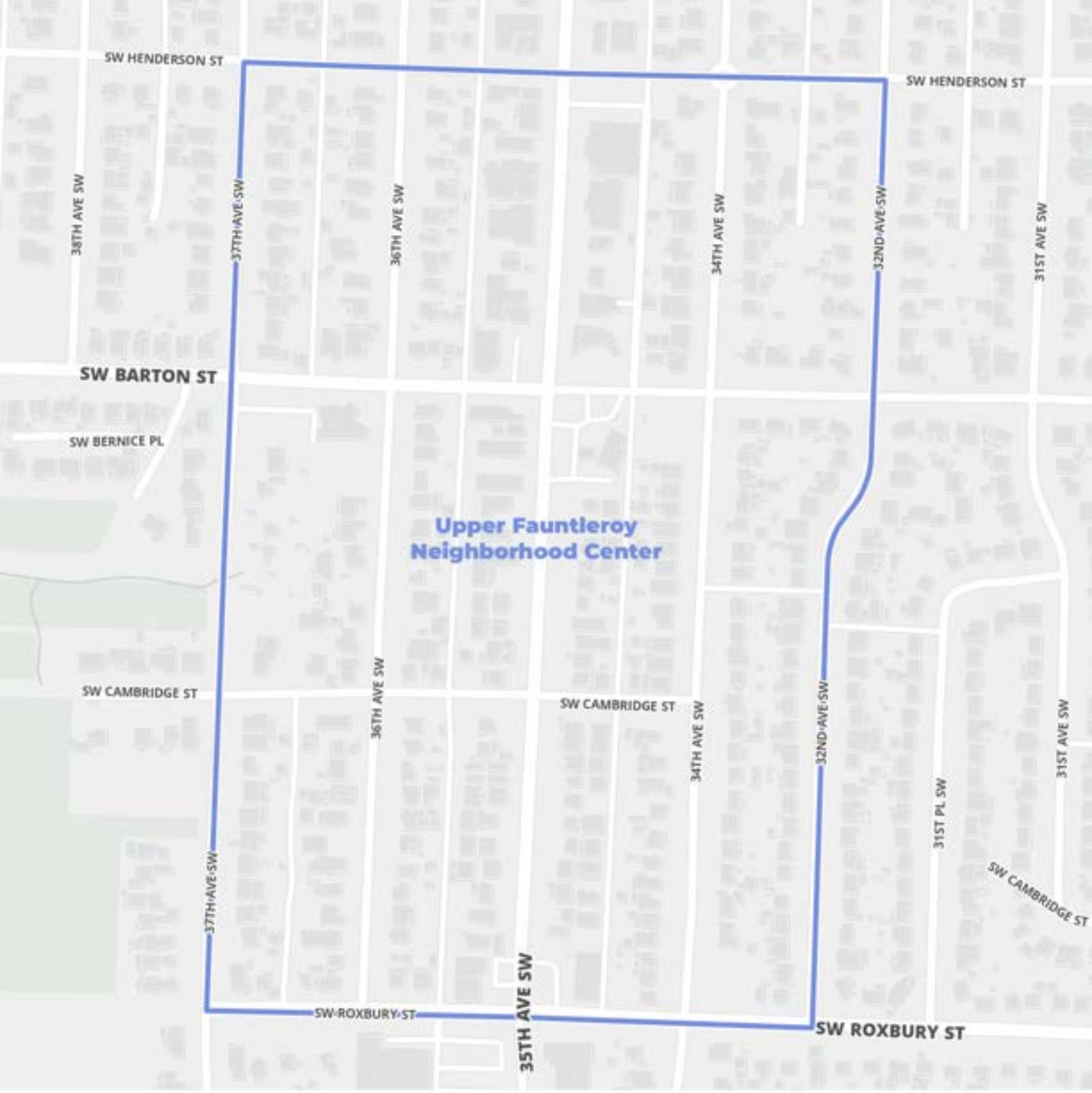
Proposed boundary

- Neighborhood Center
- Urban Center
- Regional Center

Existing center boundary

3686

Map prepared by OPCD, May 2025.



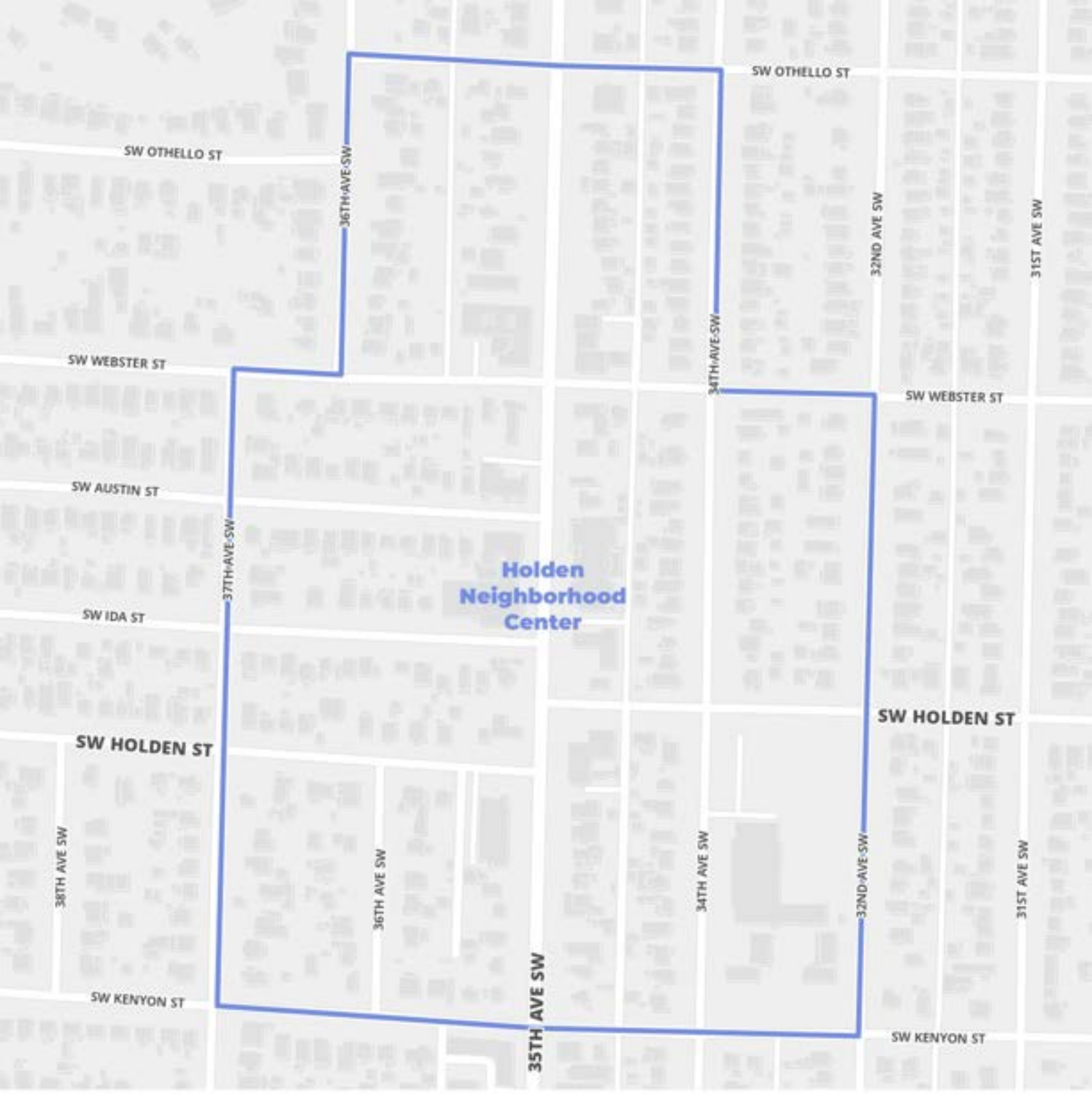
Upper Fauntleroy

Proposed boundary

- Neighborhood Center
- Urban Center
- Regional Center

Existing center boundary

Map prepared by OPCD, May 2025.



Holden

Proposed boundary

- Neighborhood Center
- Urban Center
- Regional Center

Existing center boundary

3688

Map prepared by OPCD, May 2025.

Fairmount

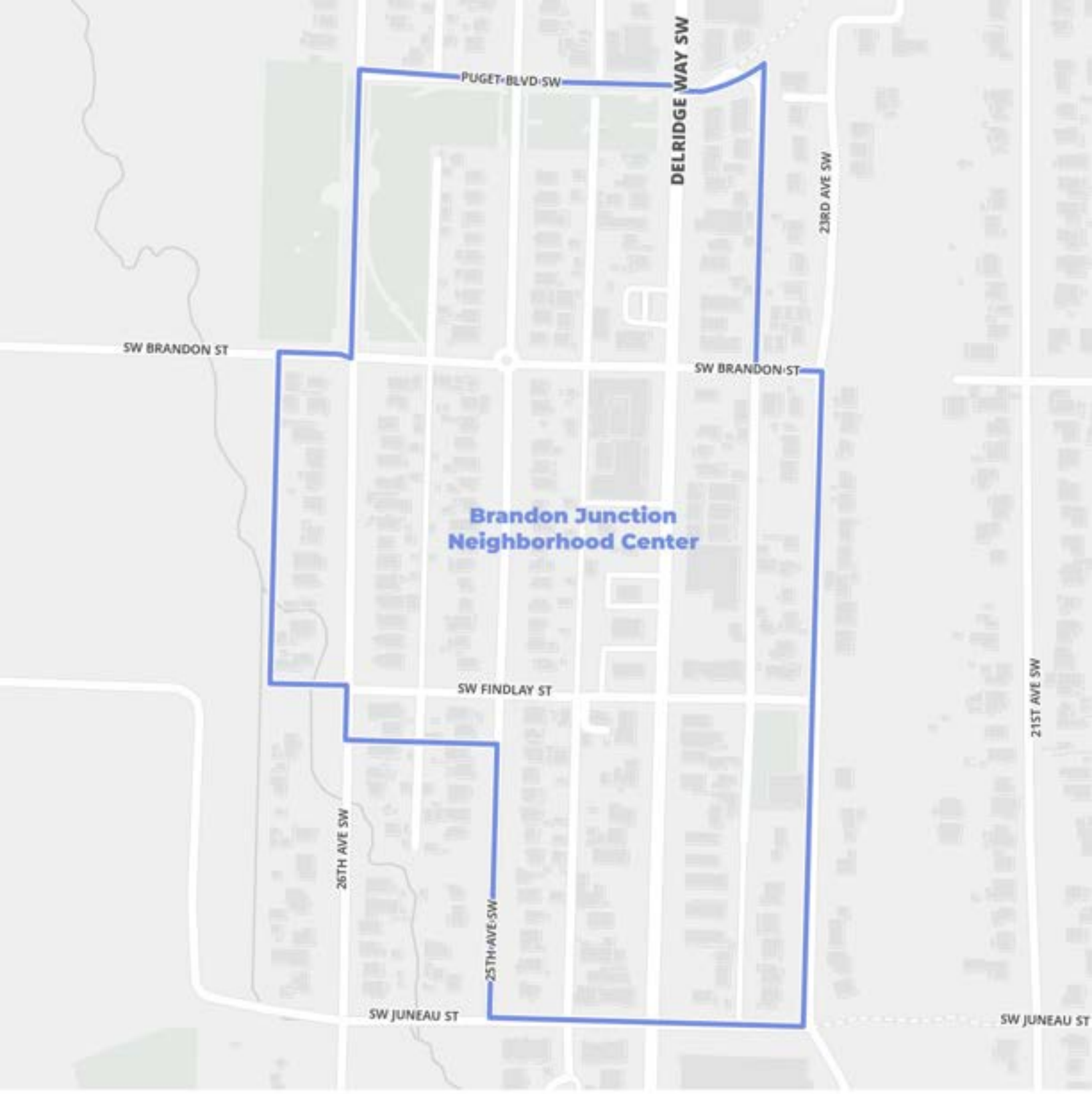
Proposed boundary

- Neighborhood Center
- Urban Center
- Regional Center

Existing center boundary

3689

Map prepared by OPCD, May 2025.



Brandon Junction

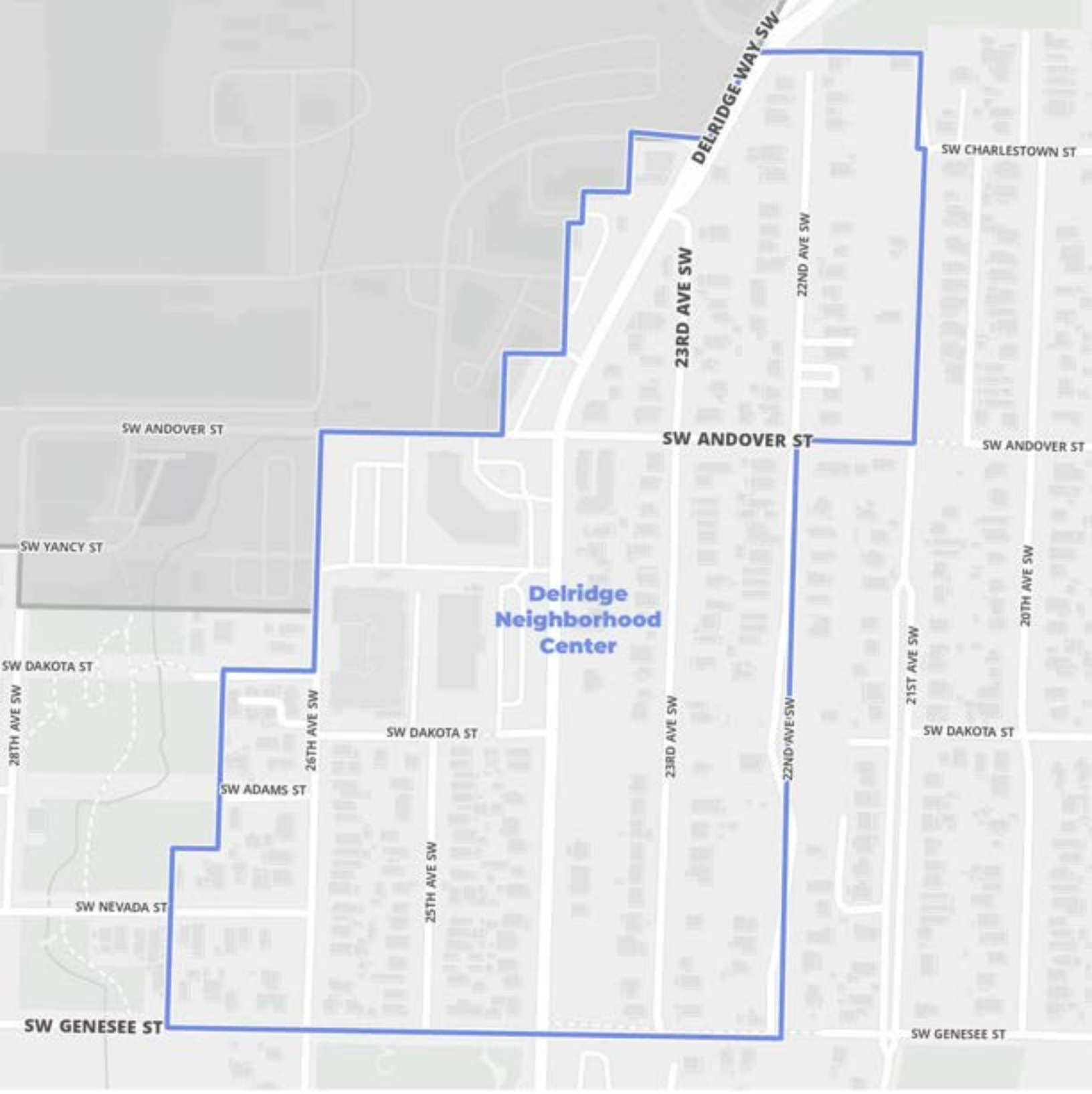
Proposed boundary

- Neighborhood Center
- Urban Center
- Regional Center

Existing center boundary

3690

Map prepared by OPCD, May 2025.



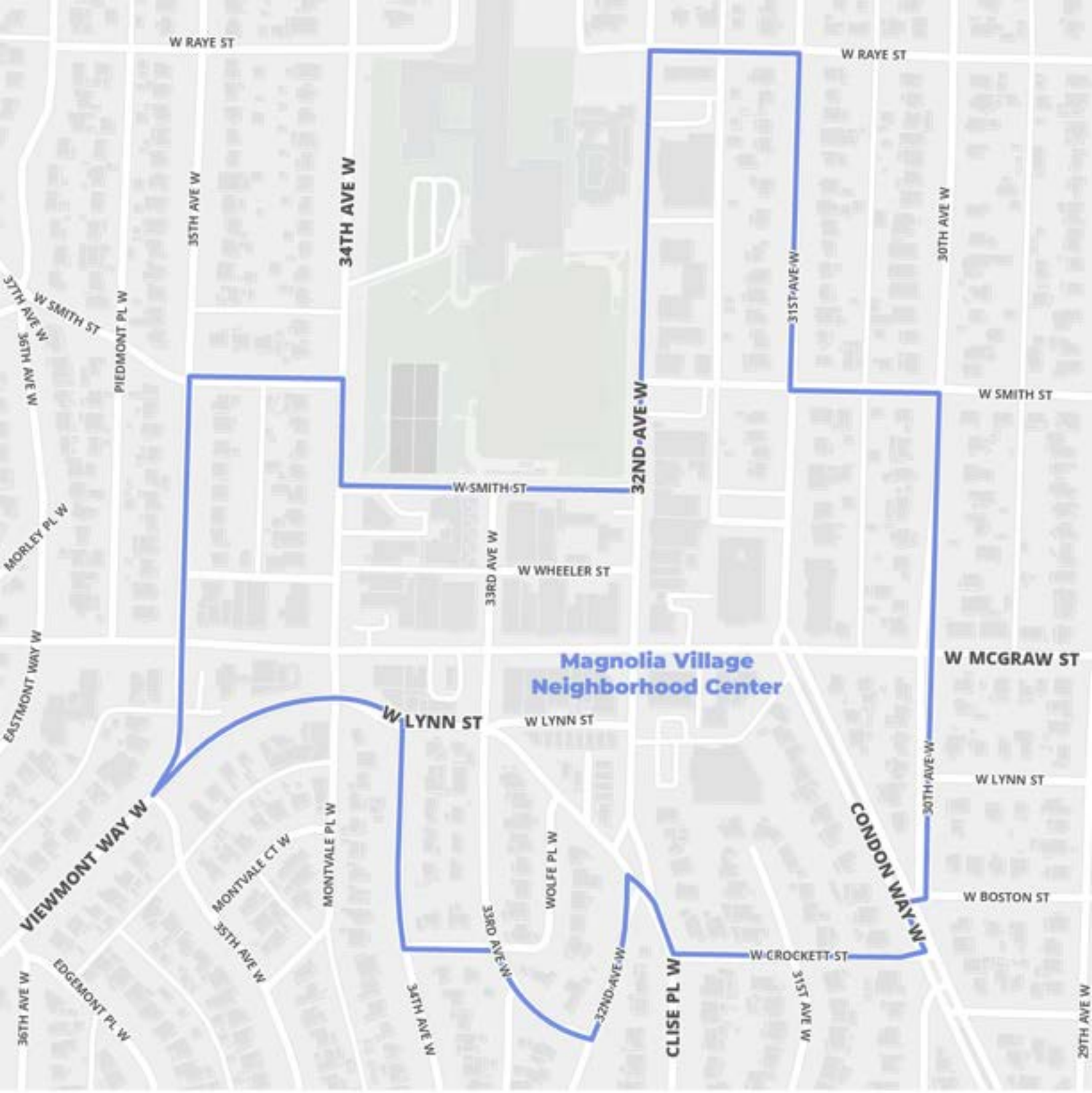
Delridge

Proposed boundary

- Neighborhood Center
- Urban Center
- Regional Center

Existing center boundary

Map prepared by OPCD, May 2025.



Magnolia Village

Proposed boundary

- Neighborhood Center
- Urban Center
- Regional Center

Existing center boundary

3692

Map prepared by OPCD, May 2025.

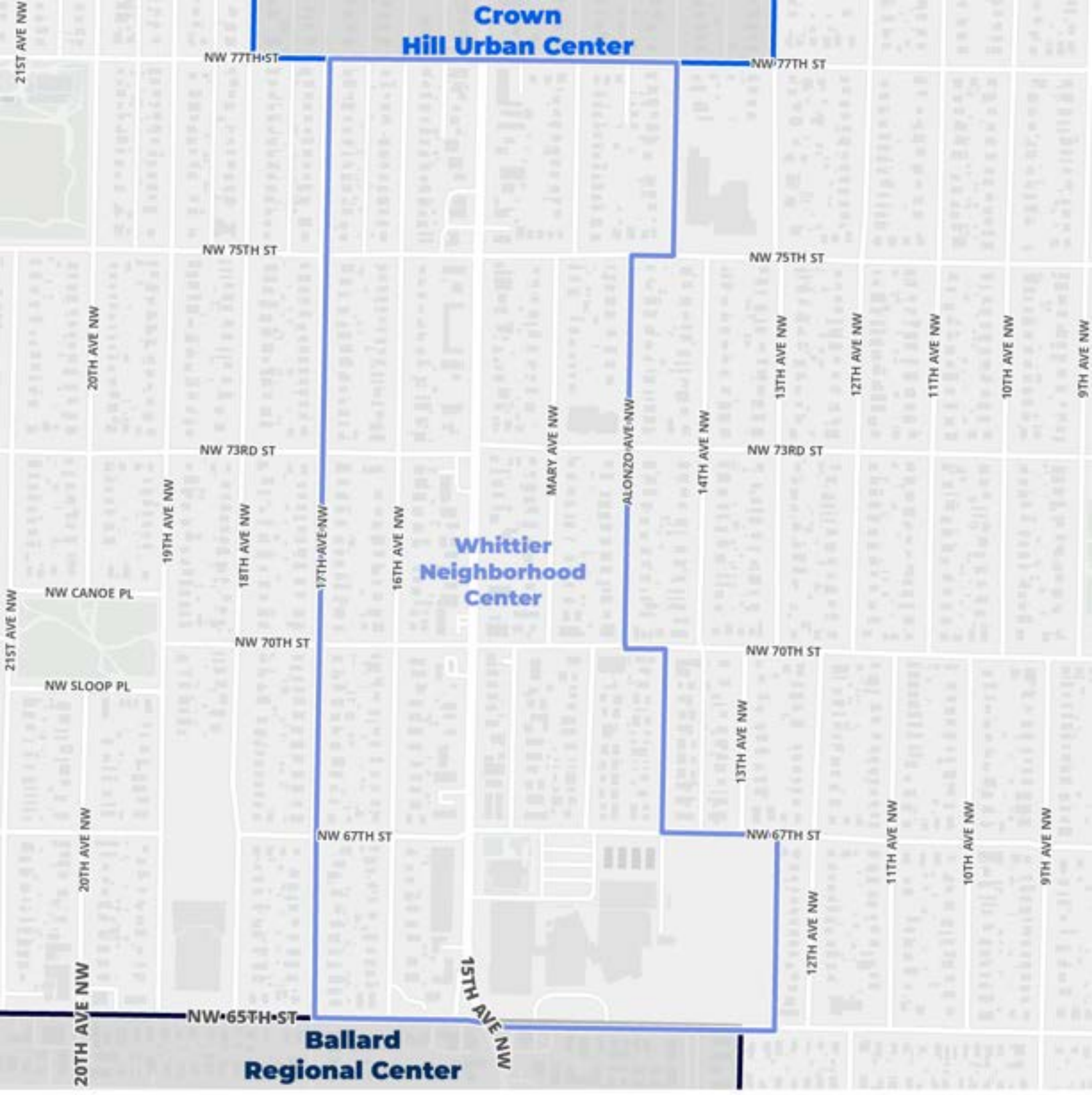
Dravus

Proposed boundary

- Neighborhood Center
- Urban Center
- Regional Center

Existing center boundary

Map prepared by OPCD, May 2025.



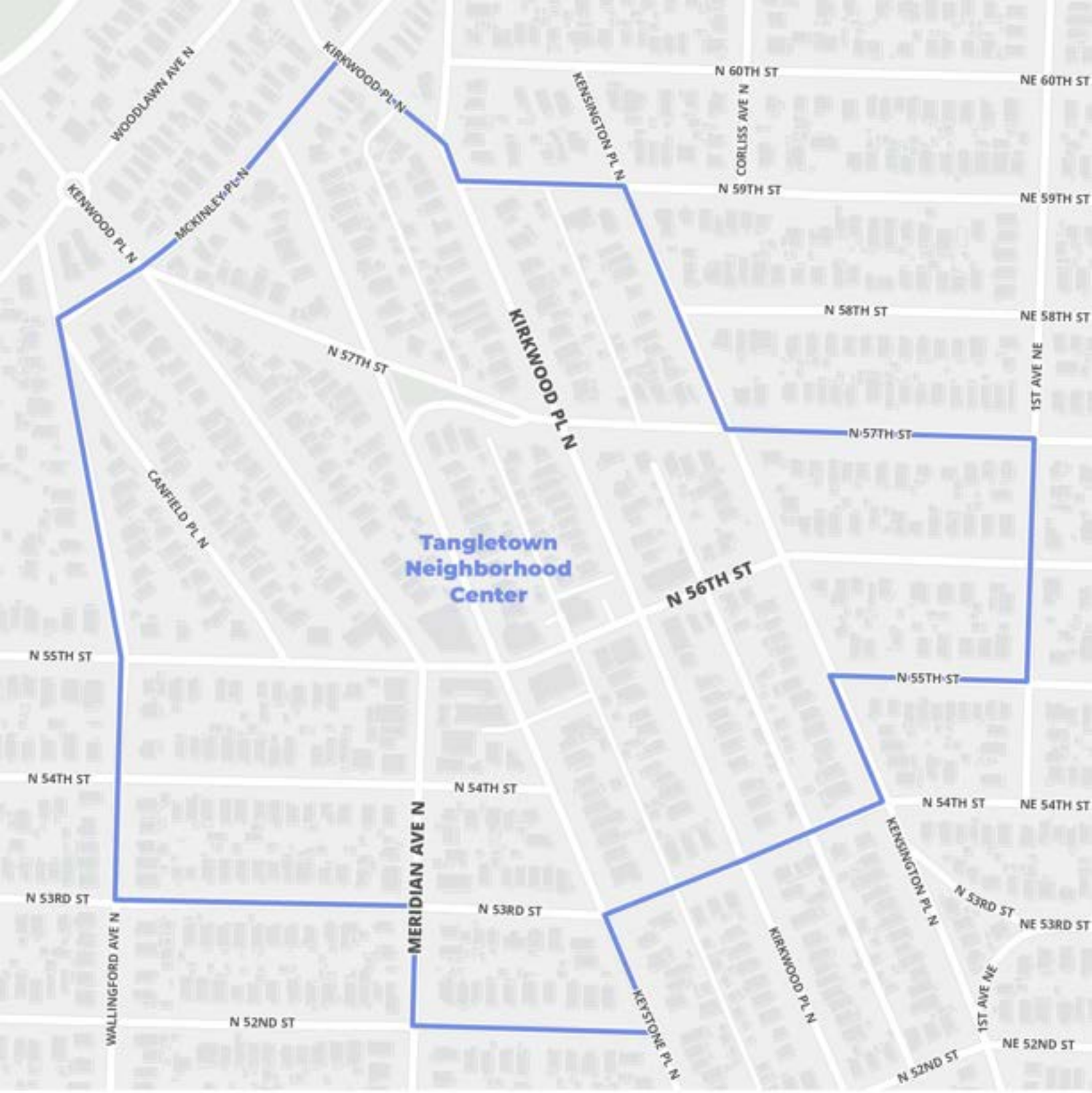
Whittier

Proposed boundary

- Neighborhood Center
- Urban Center
- Regional Center

Existing center boundary

Map prepared by OPCD, May 2025.



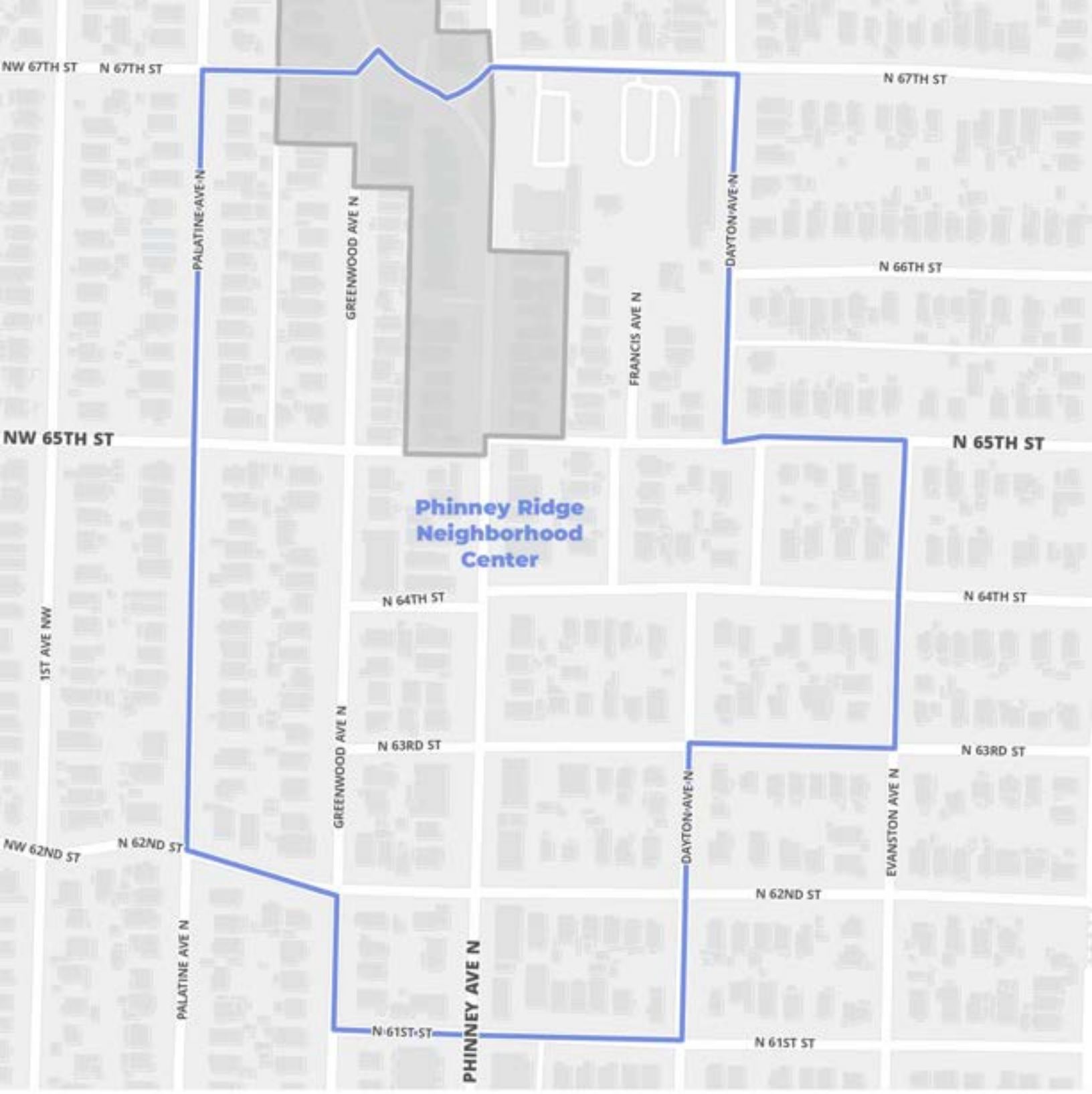
Tangletown

Proposed boundary

- Neighborhood Center
- Urban Center
- Regional Center

Existing center boundary

Map prepared by OPCD, May 2025.



Phinney Ridge

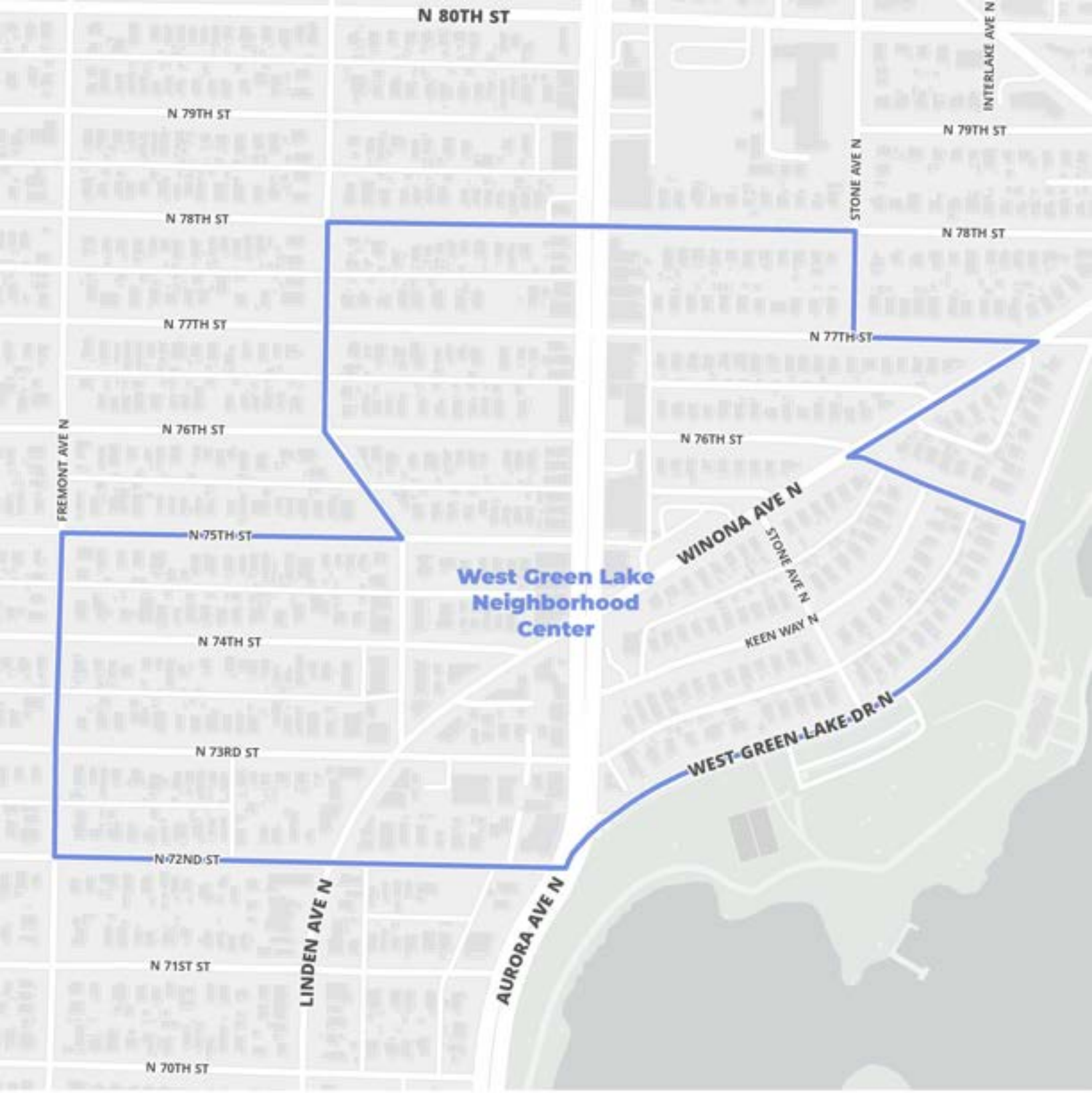
Proposed boundary

- Neighborhood Center
- Urban Center
- Regional Center

Existing center boundary

3696

Map prepared by OPCD, May 2025.



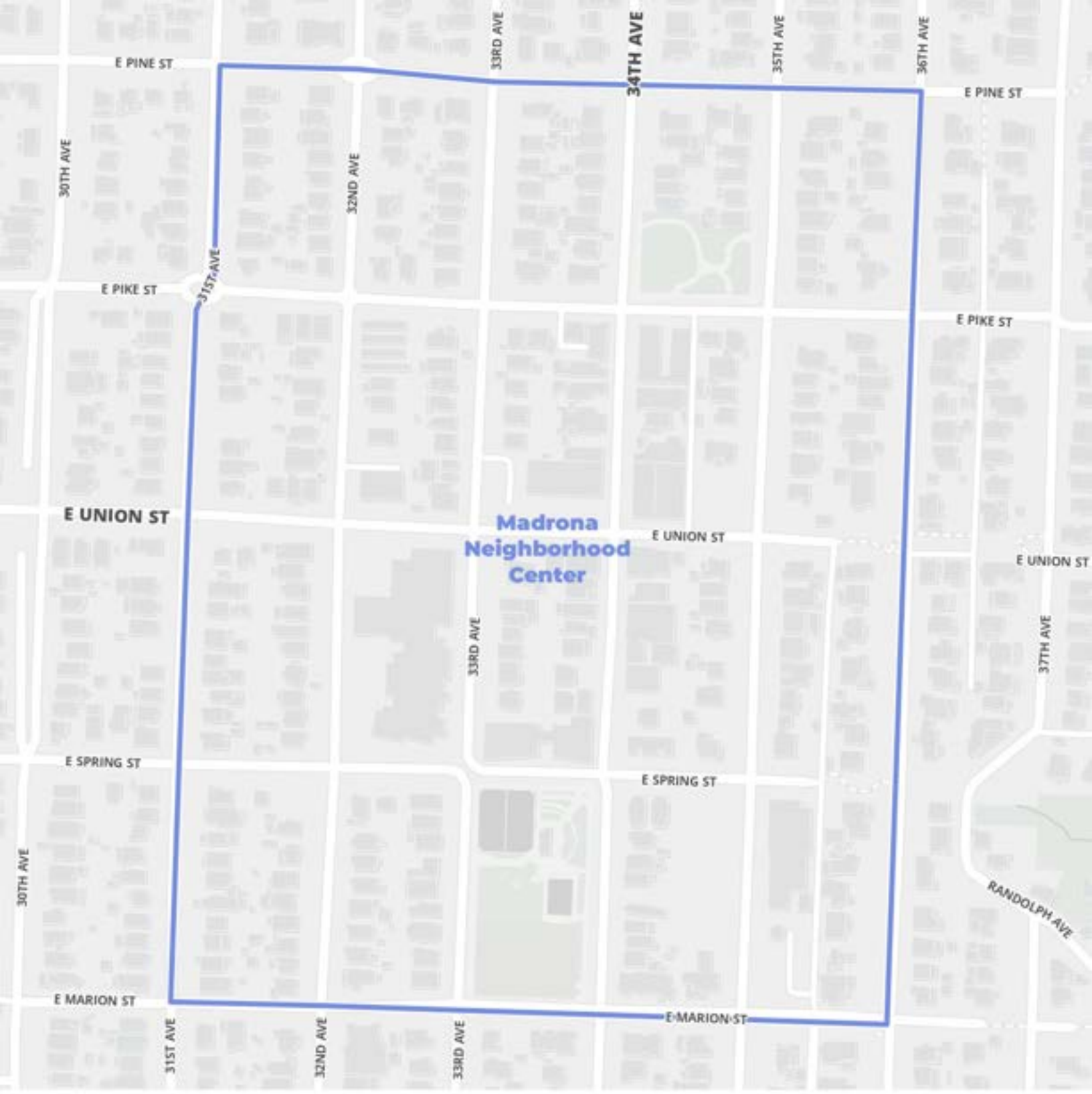
West Green Lake

Proposed boundary

- Neighborhood Center
- Urban Center
- Regional Center

Existing center boundary

Map prepared by OPCD, May 2025.



Madrona

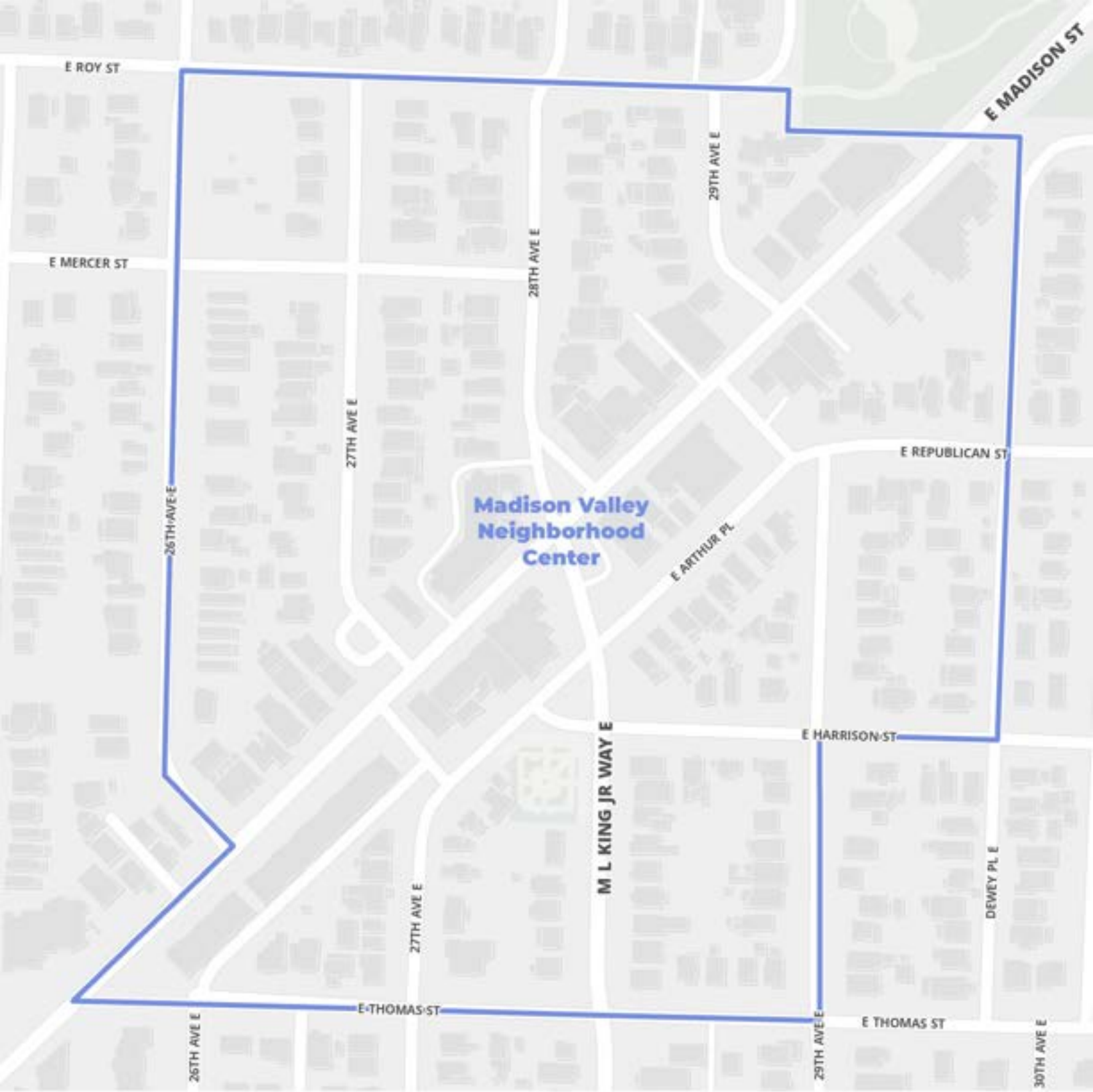
Proposed boundary

- Neighborhood Center
- Urban Center
- Regional Center

Existing center boundary

3698

Map prepared by OPCD, May 2025.



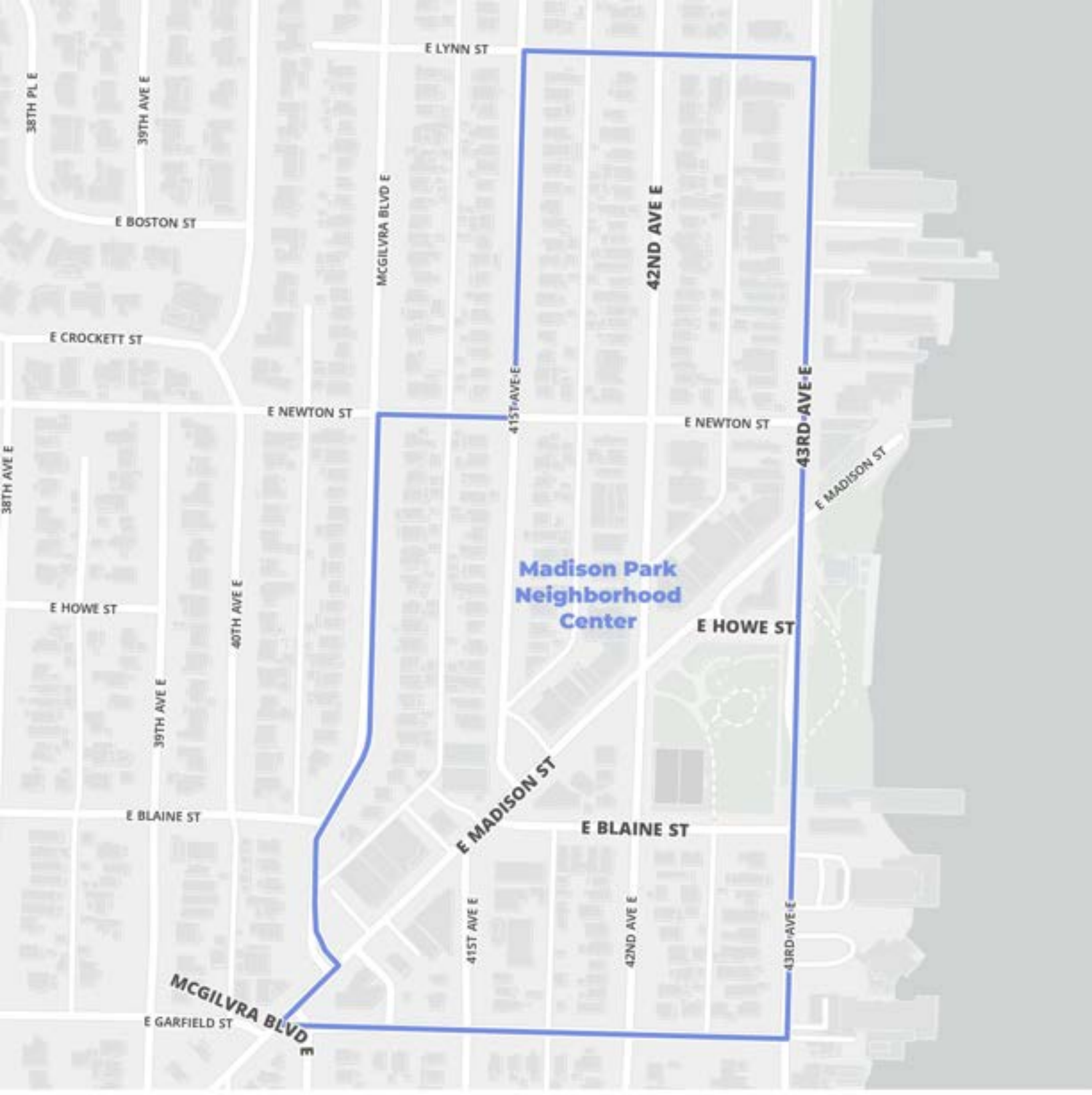
Madison Valley

Proposed boundary

- Neighborhood Center
- Urban Center
- Regional Center

Existing center boundary

Map prepared by OPCD, May 2025.



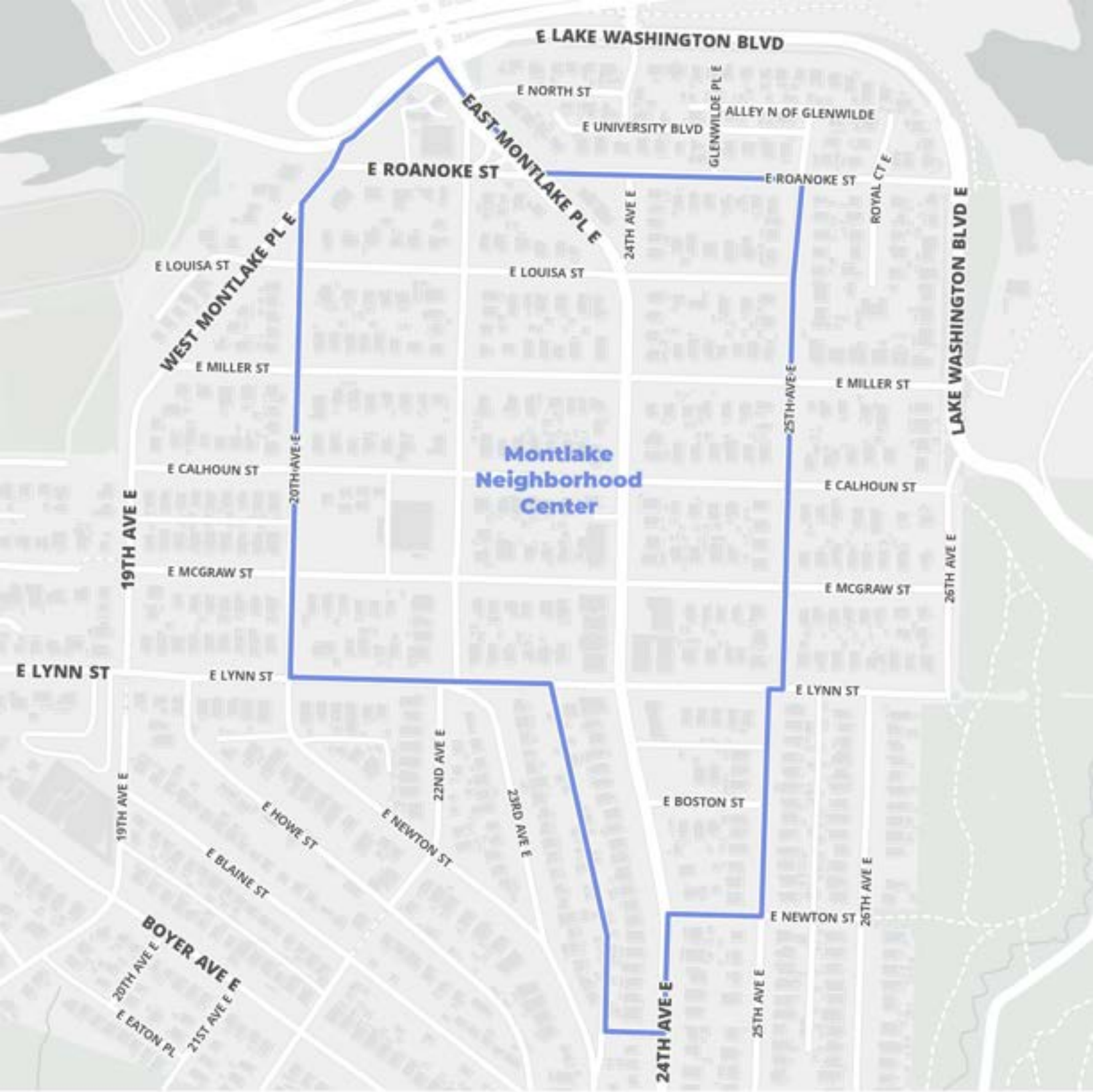
Madison Park

Proposed boundary

- Neighborhood Center
- Urban Center
- Regional Center

Existing center boundary

Map prepared by OPCD, May 2025.



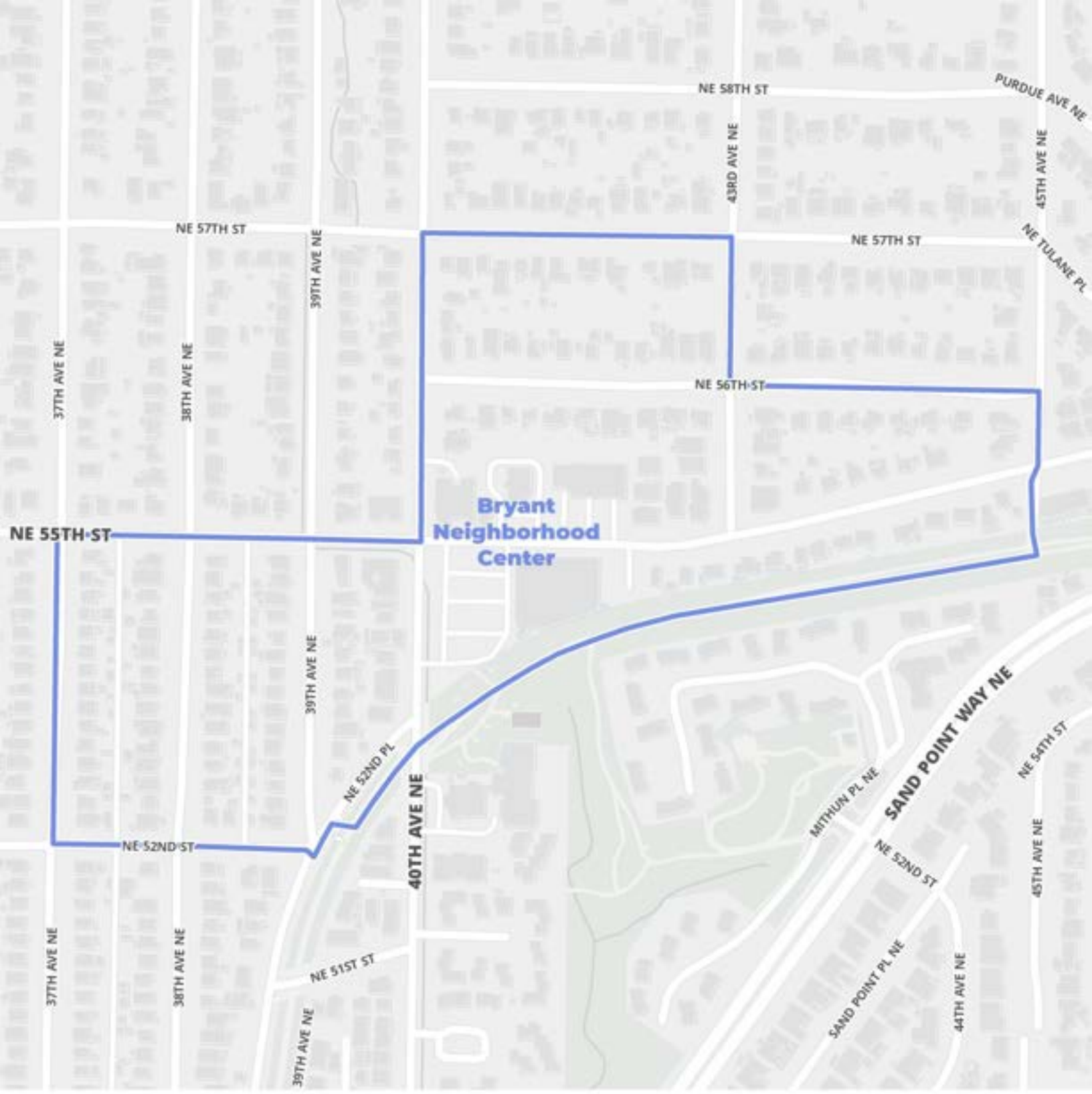
Montlake

Proposed boundary

- Neighborhood Center
- Urban Center
- Regional Center

Existing center boundary

Map prepared by OPCD, May 2025.



Bryant

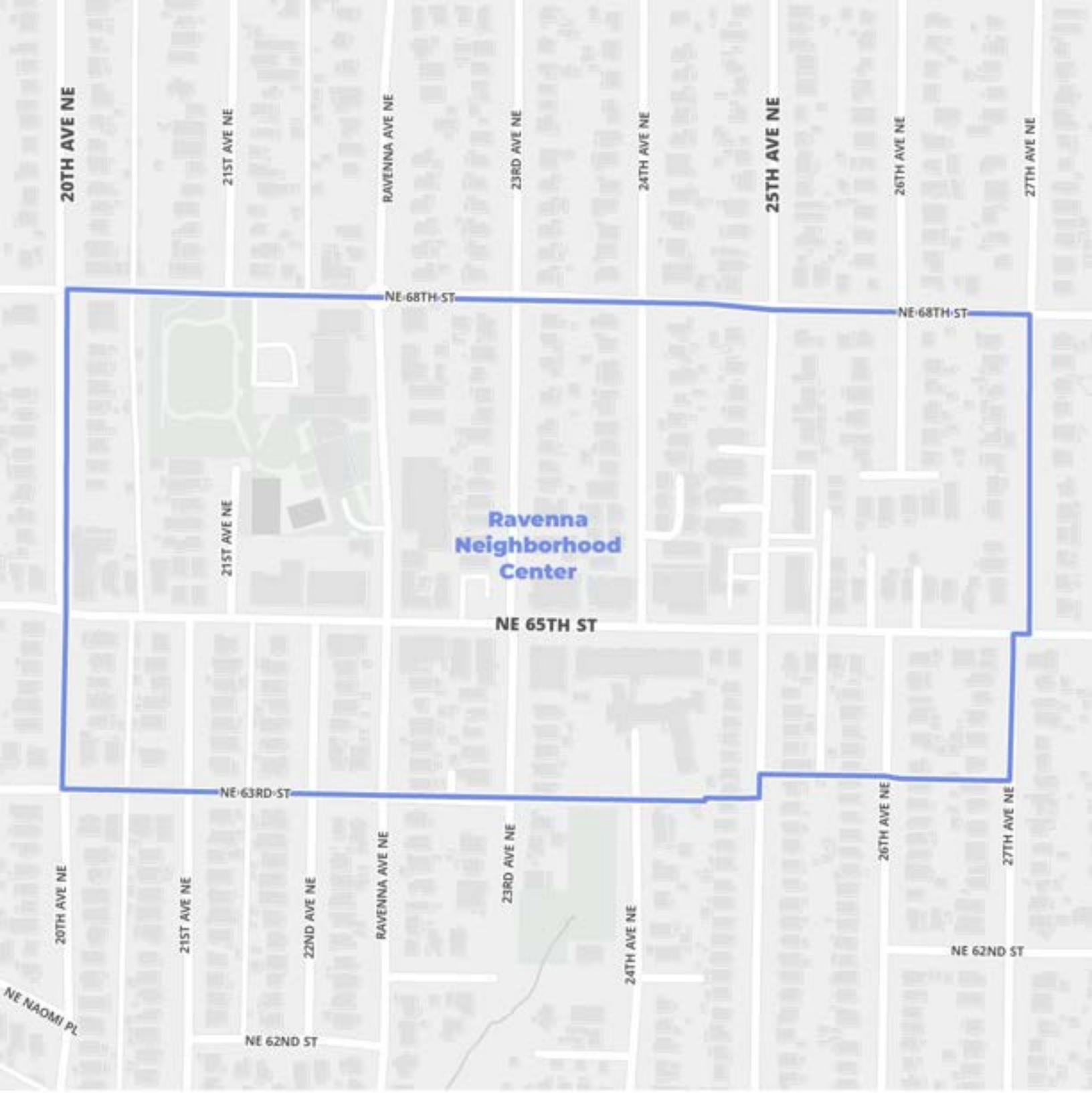
Proposed boundary

- Neighborhood Center
- Urban Center
- Regional Center

Existing center boundary

3702

Map prepared by OPCD, May 2025.



Ravenna

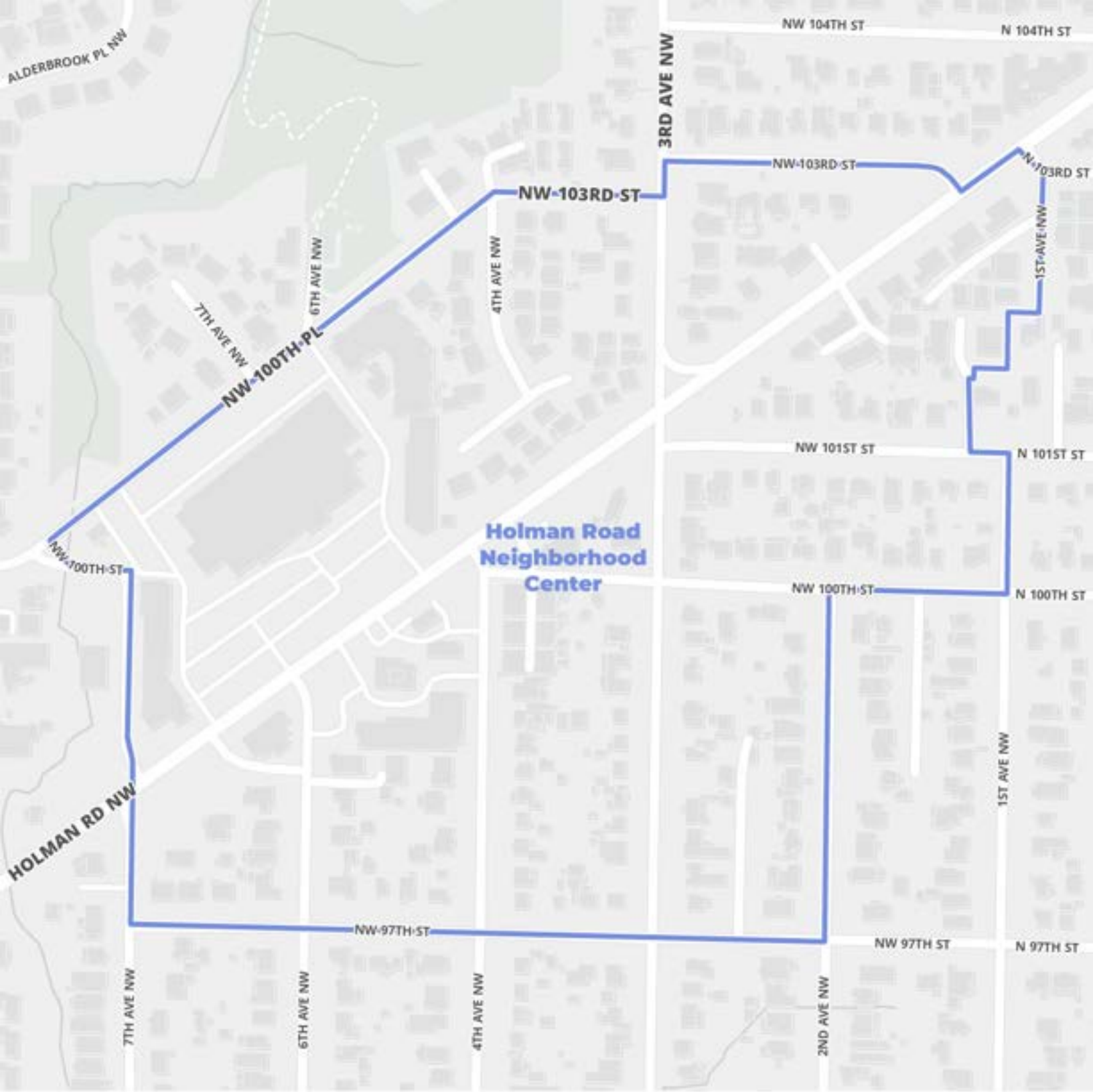
Proposed boundary

- Neighborhood Center
- Urban Center
- Regional Center

Existing center boundary

3703

Map prepared by OPCD, May 2025.



Holman Road

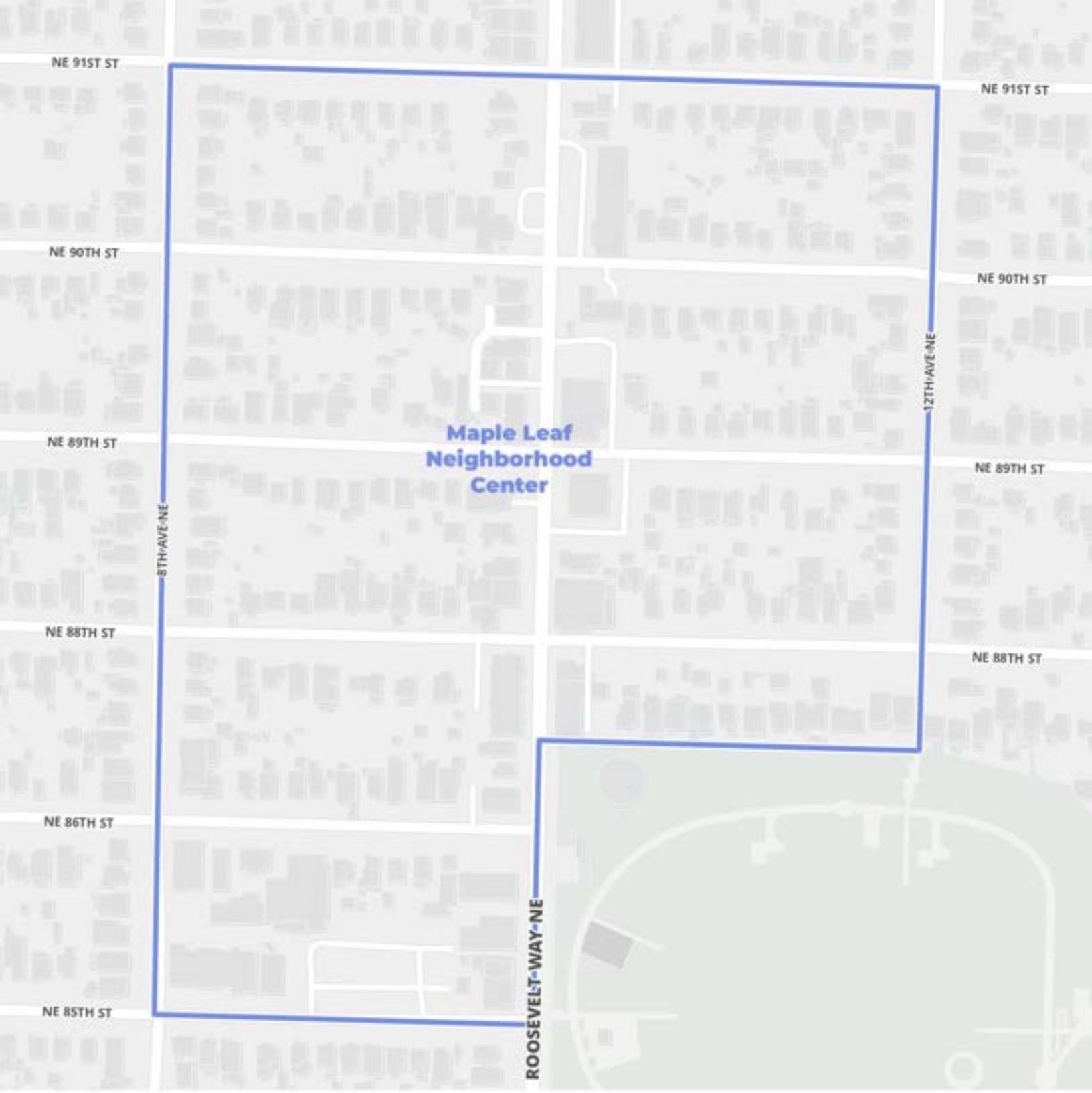
Proposed boundary

- Neighborhood Center
- Urban Center
- Regional Center

Existing center boundary

3704

Map prepared by OPCD, May 2025.



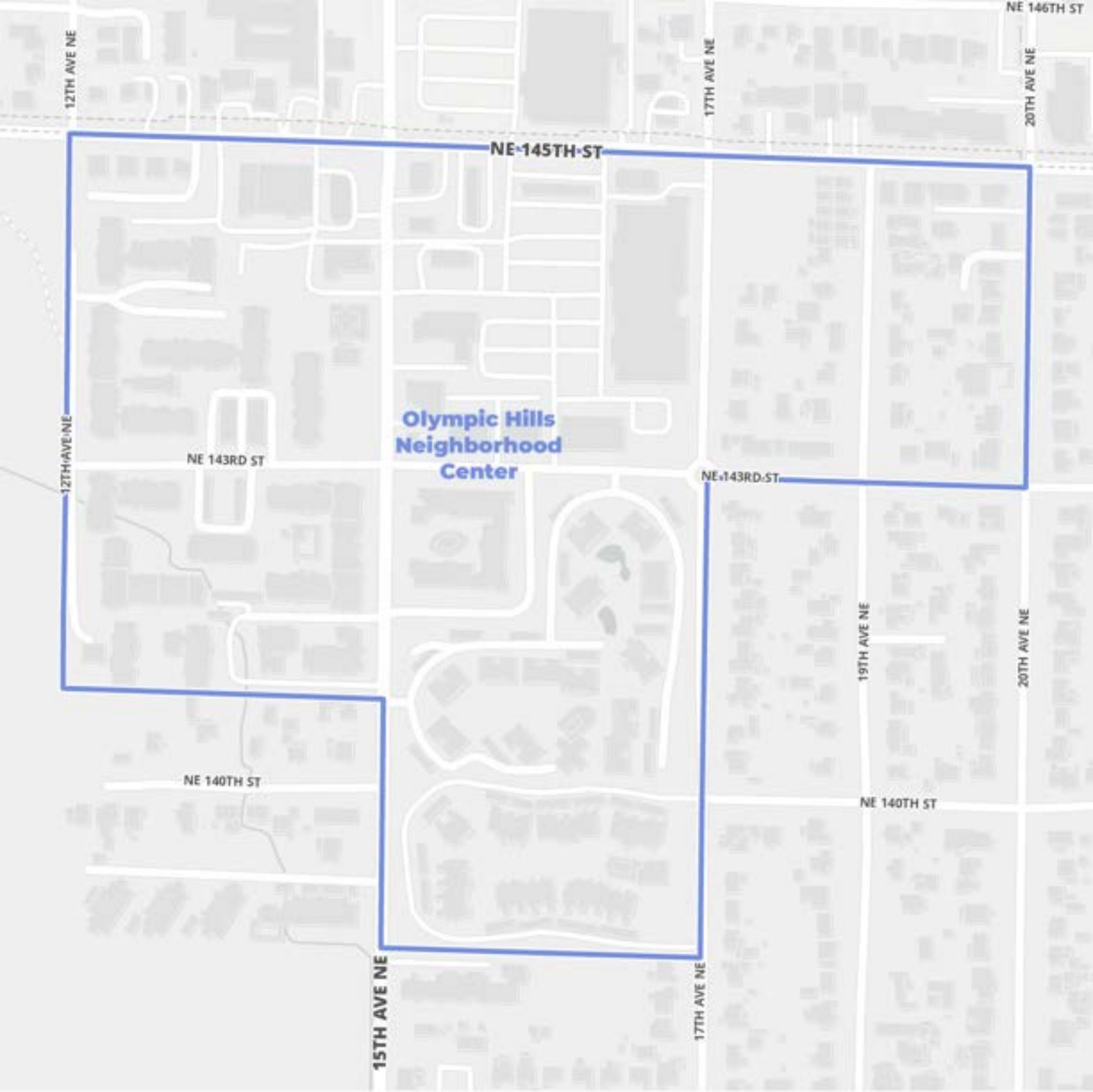
Maple Leaf

Proposed boundary

- Neighborhood Center
- Urban Center
- Regional Center

Existing center boundary

Map prepared by OPCD, May 2025.



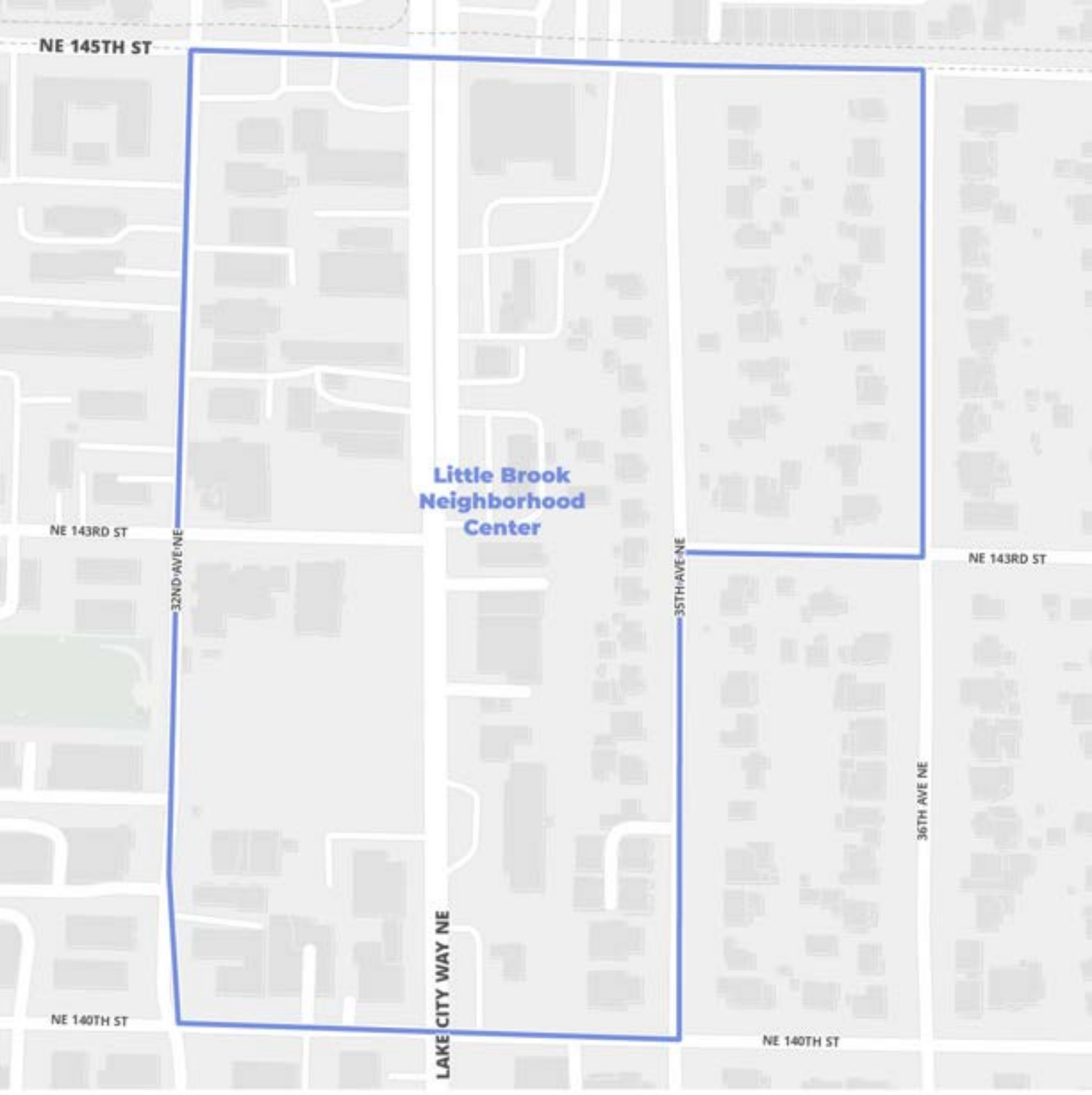
Olympic Hills

Proposed boundary

- Neighborhood Center
- Urban Center
- Regional Center

Existing center boundary

Map prepared by OPCD, May 2025.



Little Brook

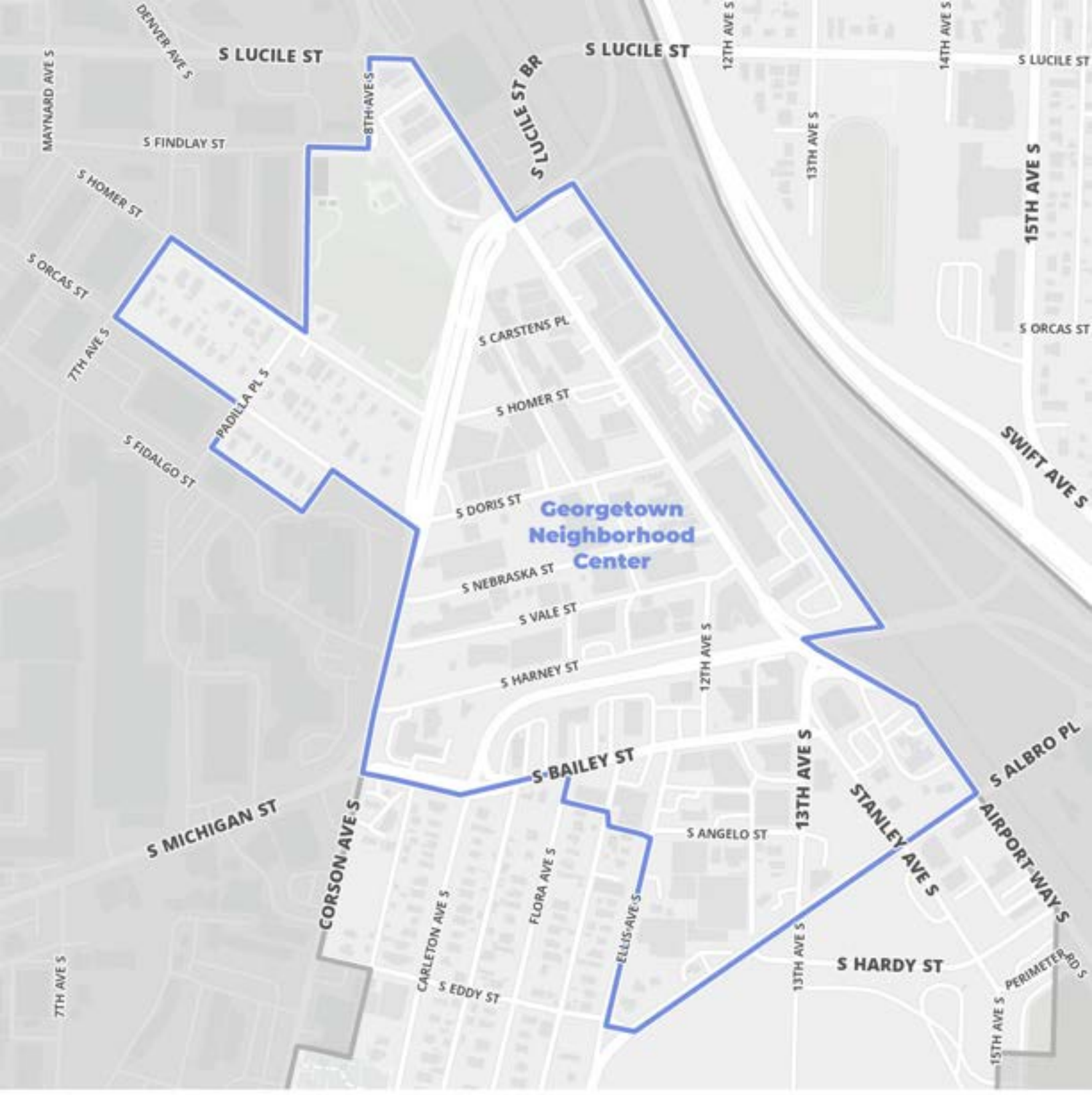
Proposed boundary

- Neighborhood Center
- Urban Center
- Regional Center

Existing center boundary

3707

Map prepared by OPCD, May 2025.



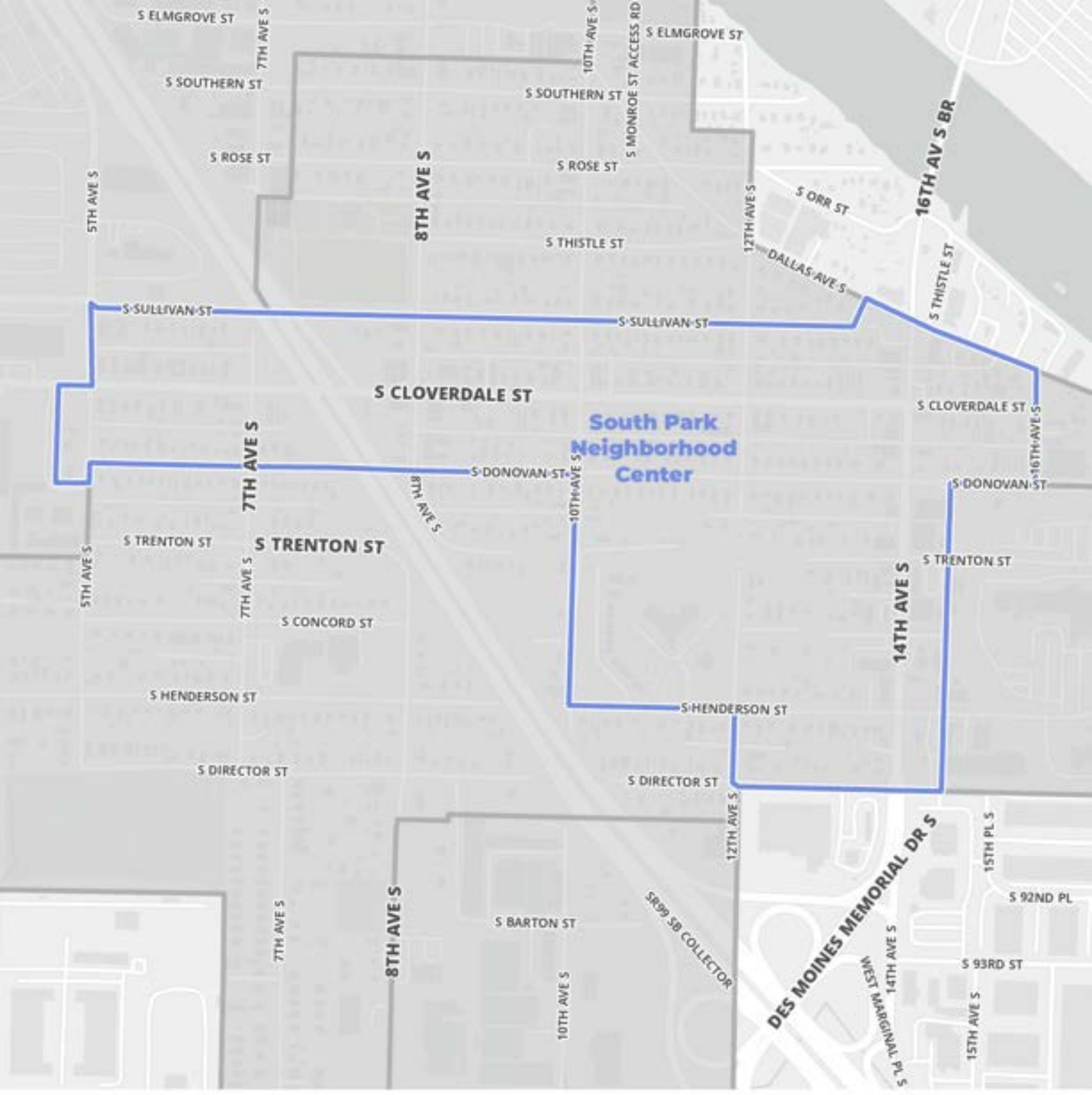
Georgetown

Proposed boundary

- Neighborhood Center
- Urban Center
- Regional Center

Existing center boundary

Map prepared by OPCD, May 2025.



South Park

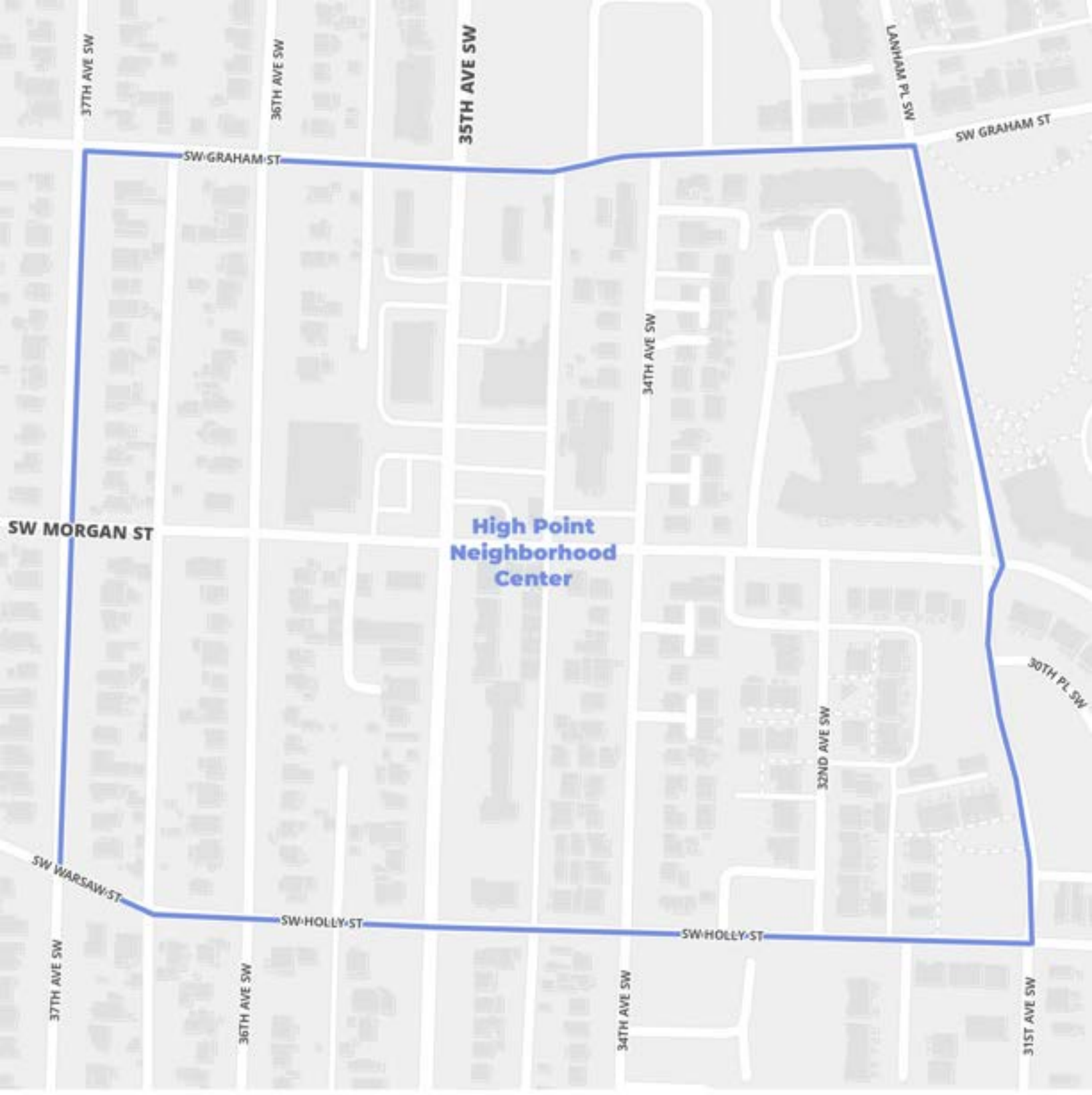
Proposed boundary

- Neighborhood Center
- Urban Center
- Regional Center

Existing center boundary

3709

Map prepared by OPCD, May 2025.



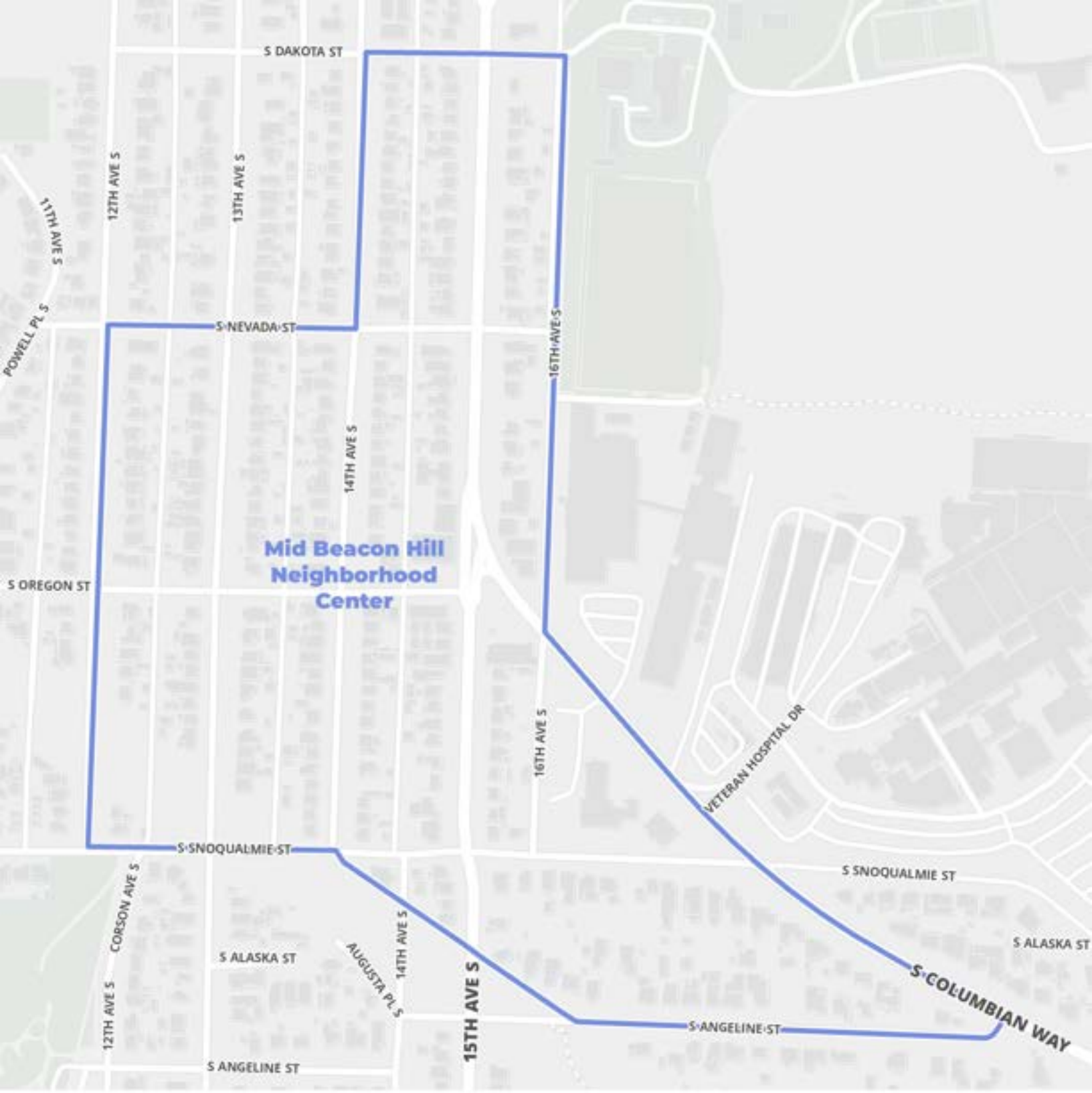
High Point

Proposed boundary

- Neighborhood Center
- Urban Center
- Regional Center

Existing center boundary

Map prepared by OPCD, May 2025.



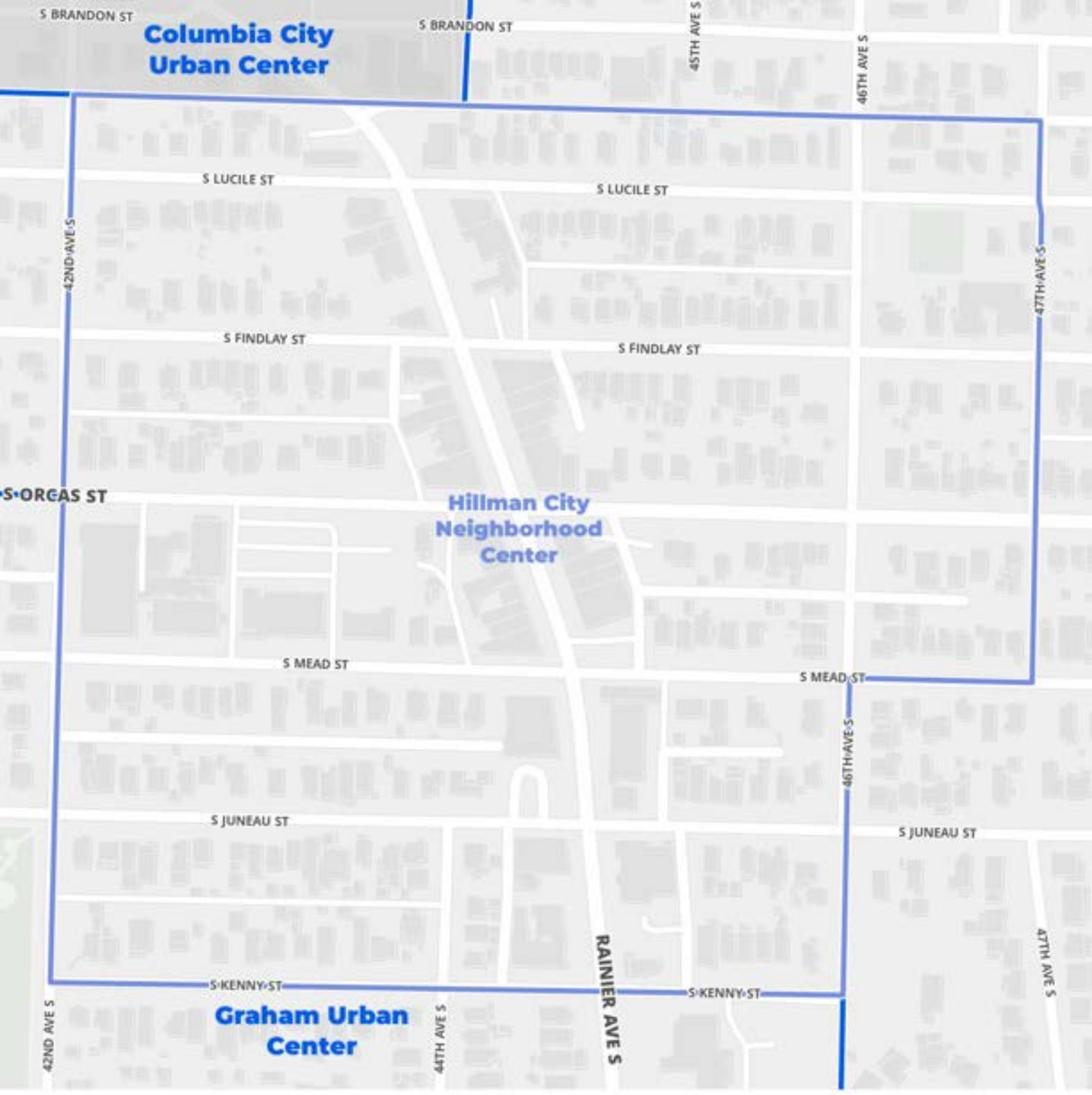
Mid Beacon Hill

Proposed boundary

- Neighborhood Center
- Urban Center
- Regional Center

Existing center boundary

Map prepared by OPCD, May 2025.



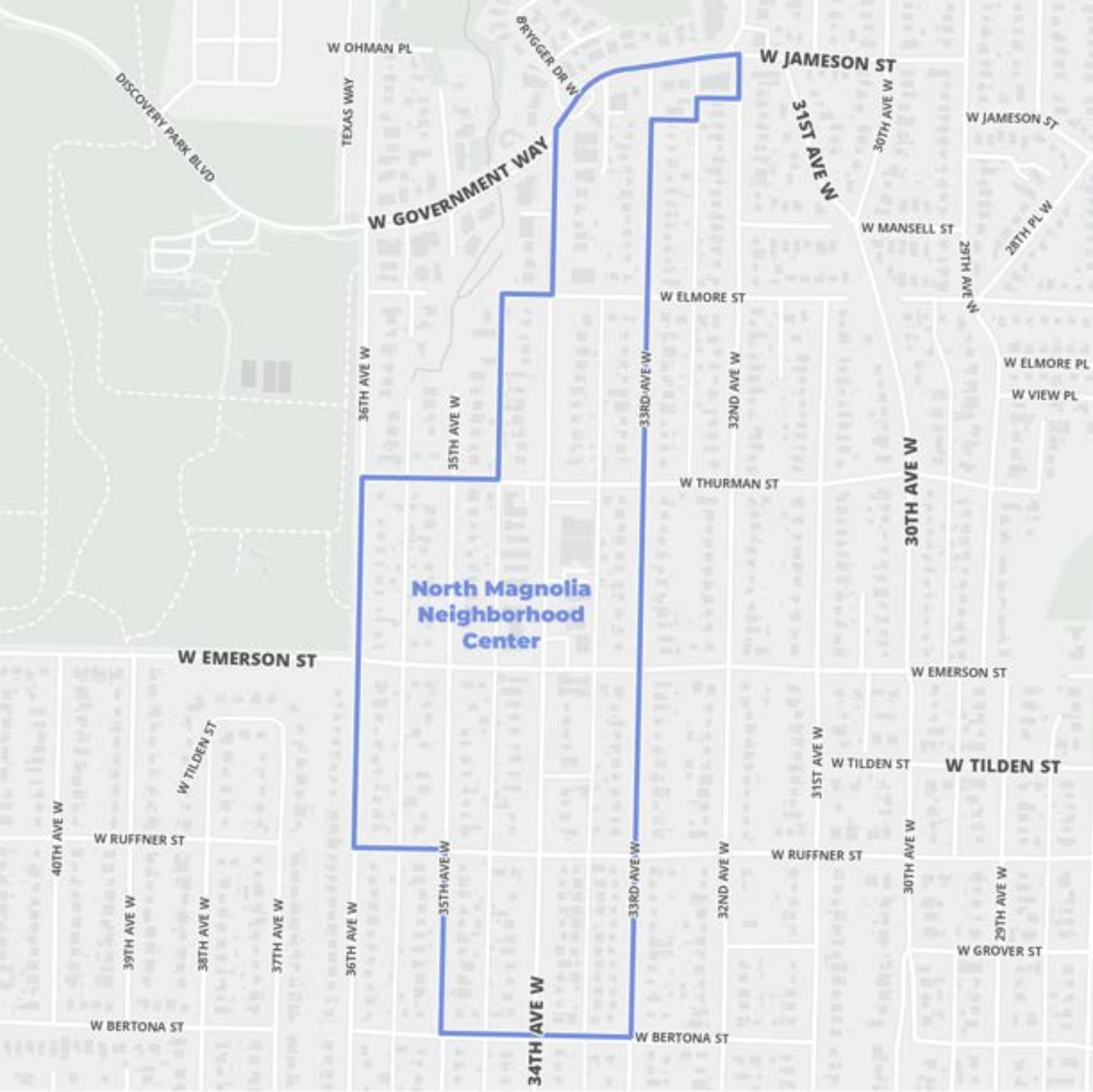
Hillman City

Proposed boundary

- Neighborhood Center
- Urban Center
- Regional Center

Existing center boundary

Map prepared by OPCD, May 2025.



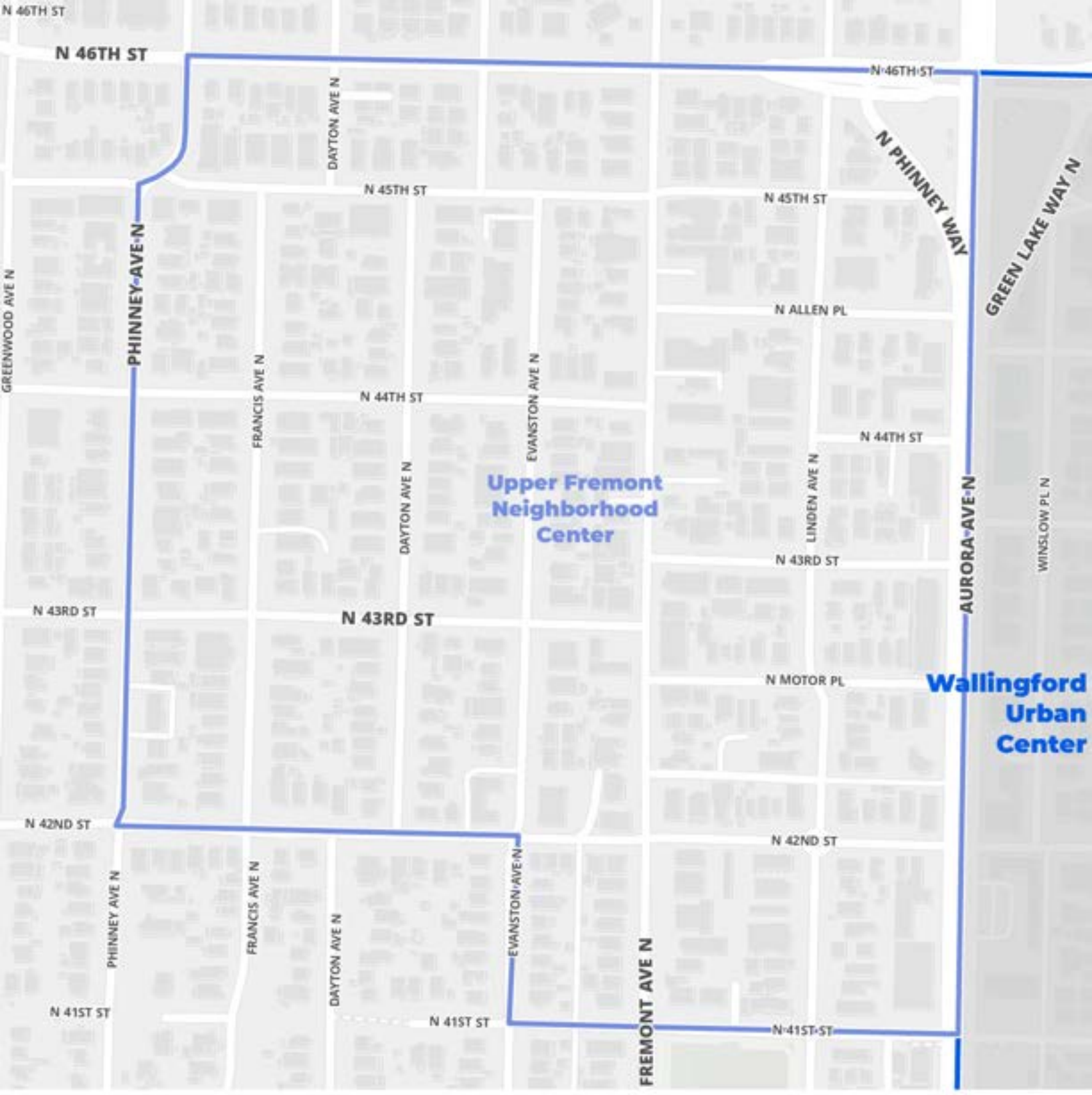
North Magnolia

Proposed boundary

- Neighborhood Center
- Urban Center
- Regional Center

Existing center boundary

Map prepared by OPCD, May 2025.



Upper Fremont

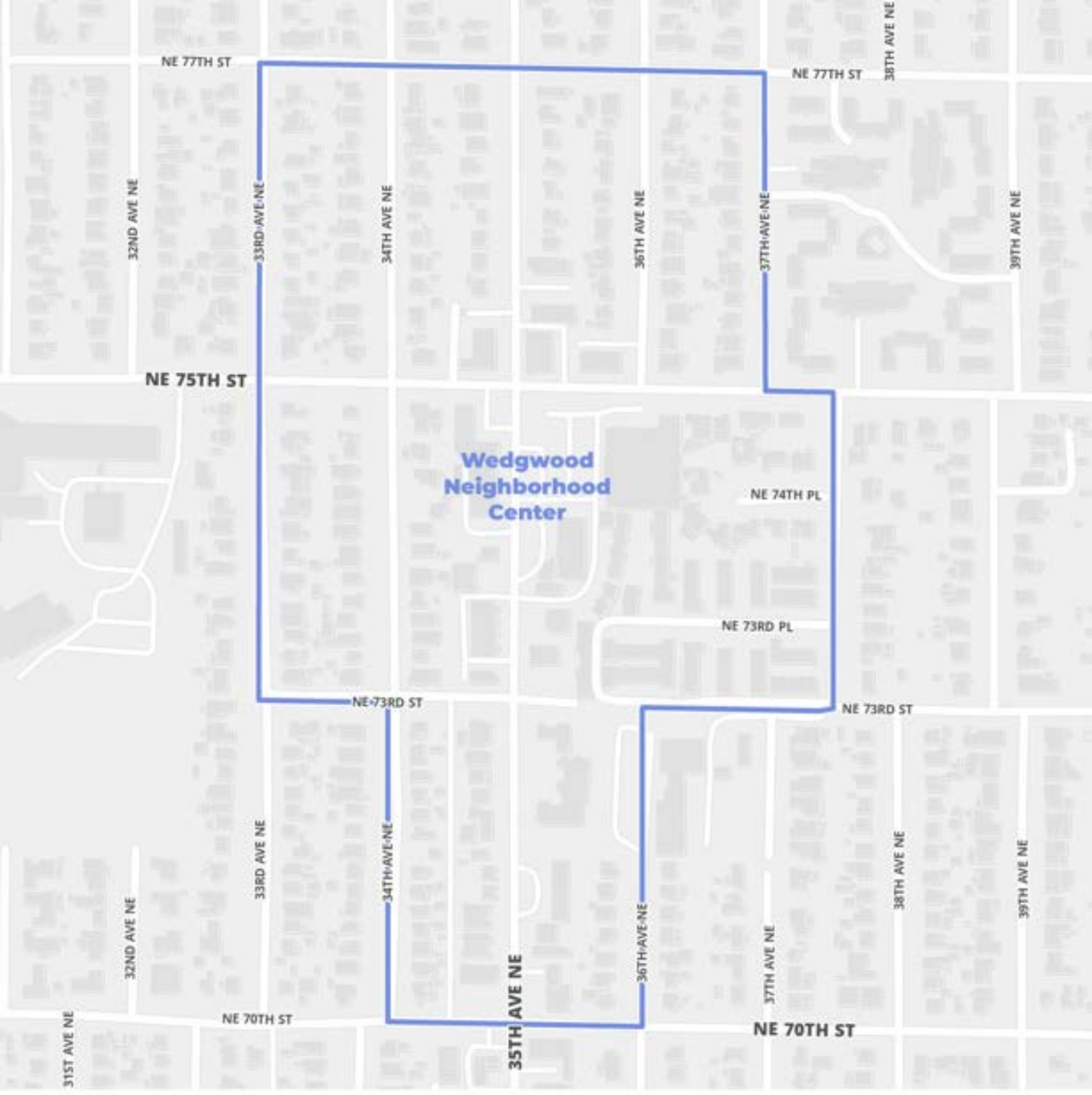
Proposed boundary

- Neighborhood Center
- Urban Center
- Regional Center

Existing center boundary

3714

Map prepared by OPCD, May 2025.



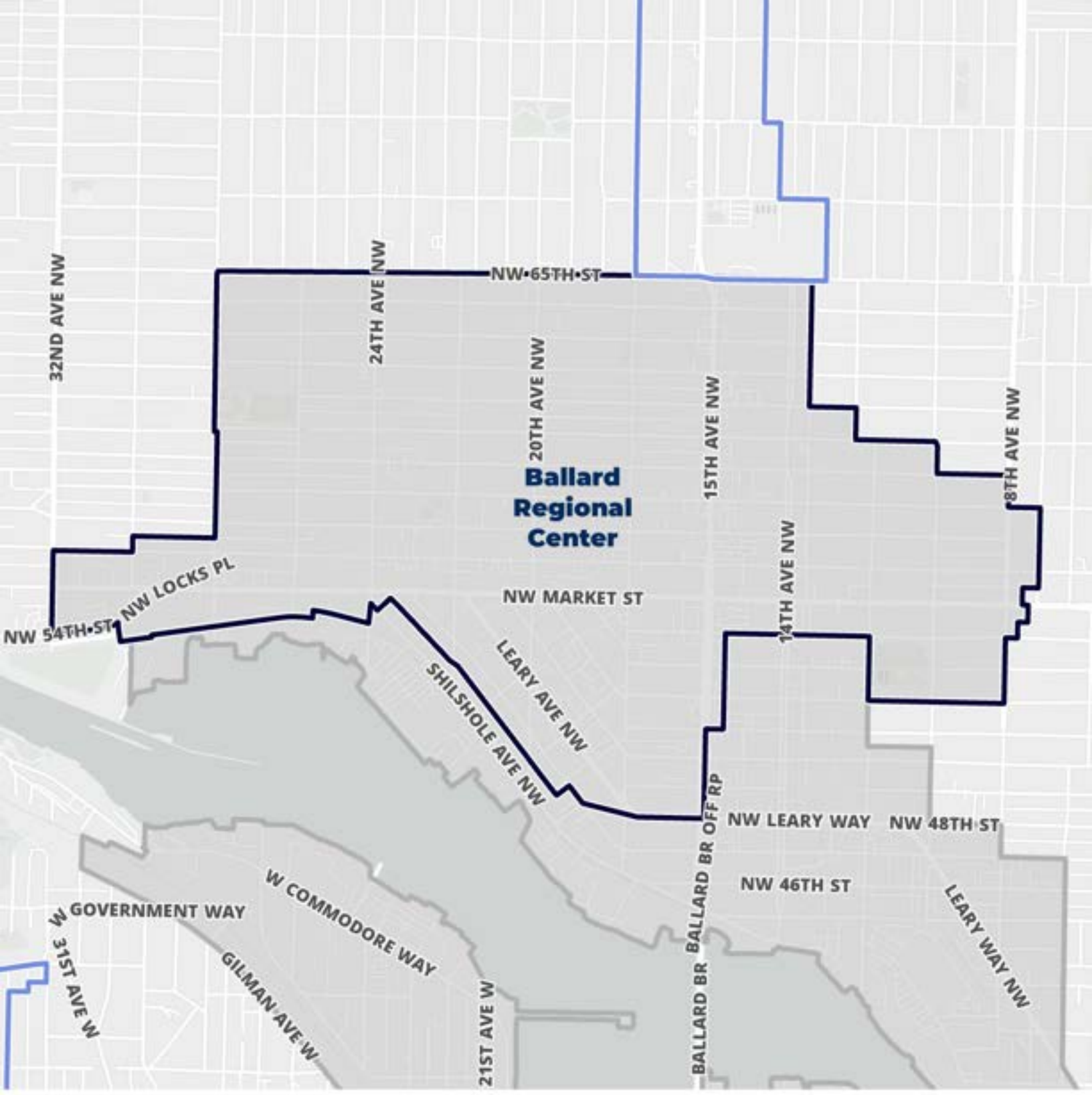
Wedgwood

Proposed boundary

- Neighborhood Center
- Urban Center
- Regional Center

Existing center boundary

Map prepared by OPCD, May 2025.



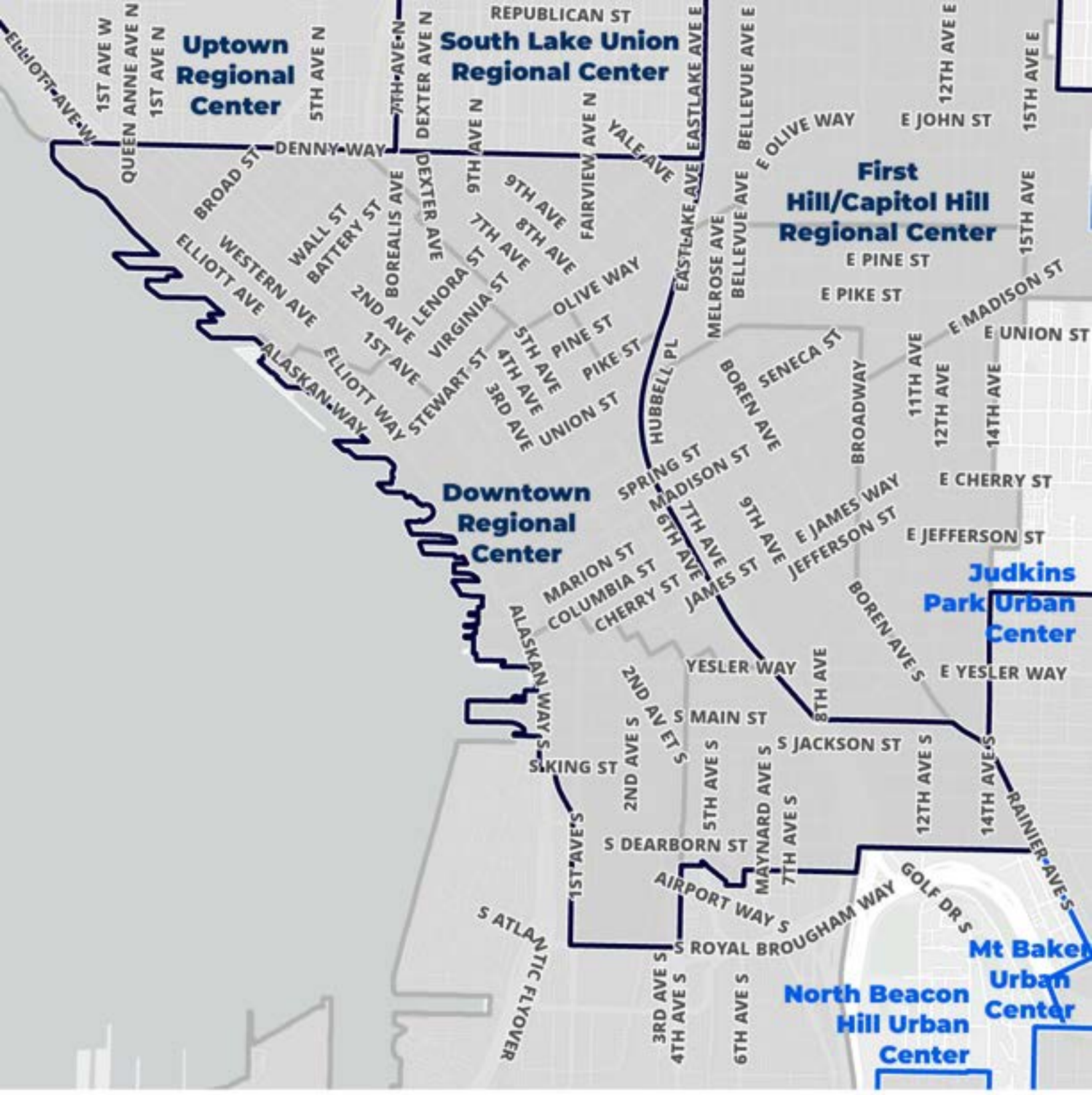
Ballard

Proposed boundary

- Neighborhood Center
- Urban Center
- Regional Center

Existing center boundary

Map prepared by OPCD, May 2025.



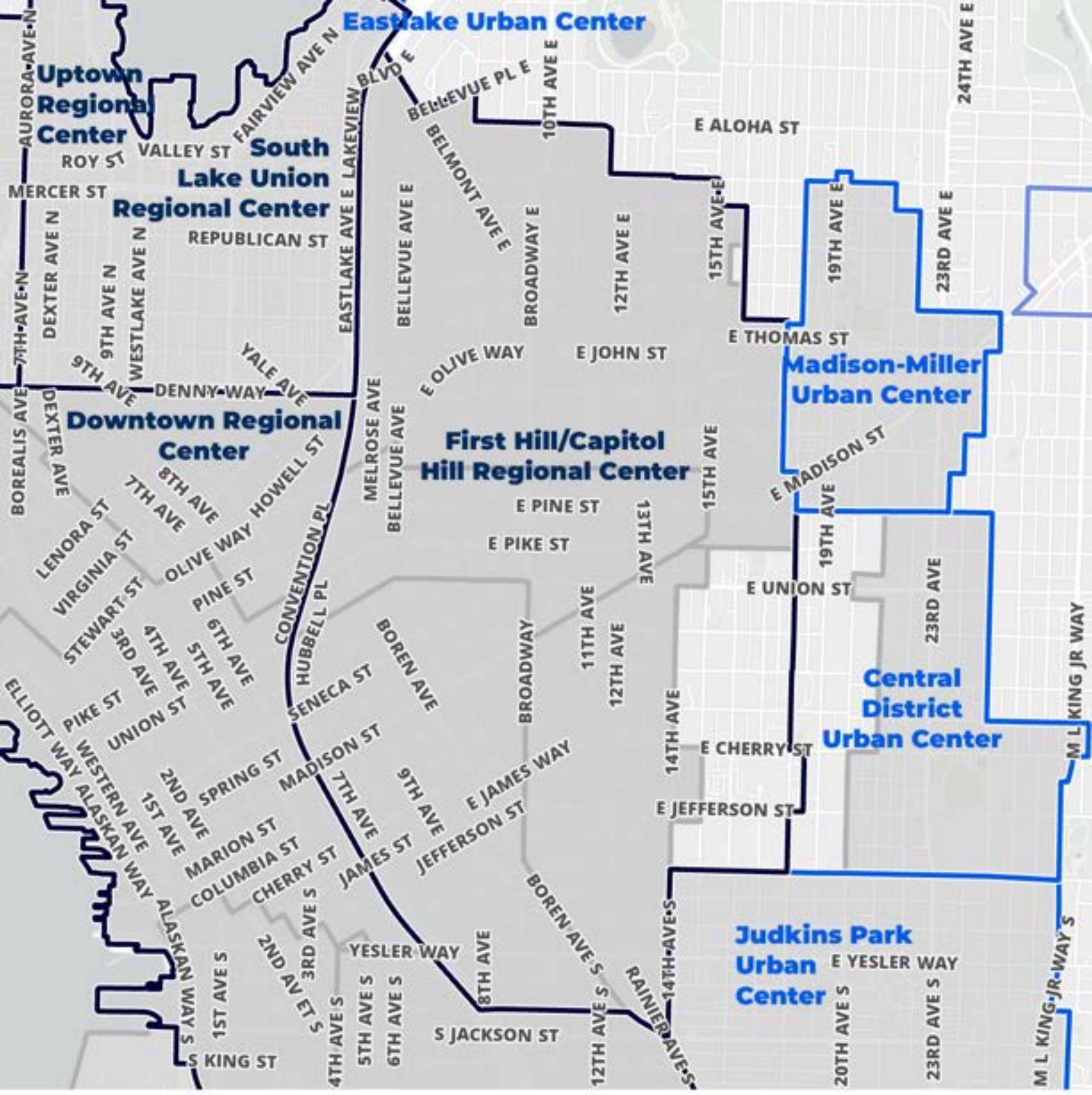
Downtown

Proposed boundary

- Neighborhood Center
- Urban Center
- Regional Center

Existing center boundary

Map prepared by OPCD, May 2025.



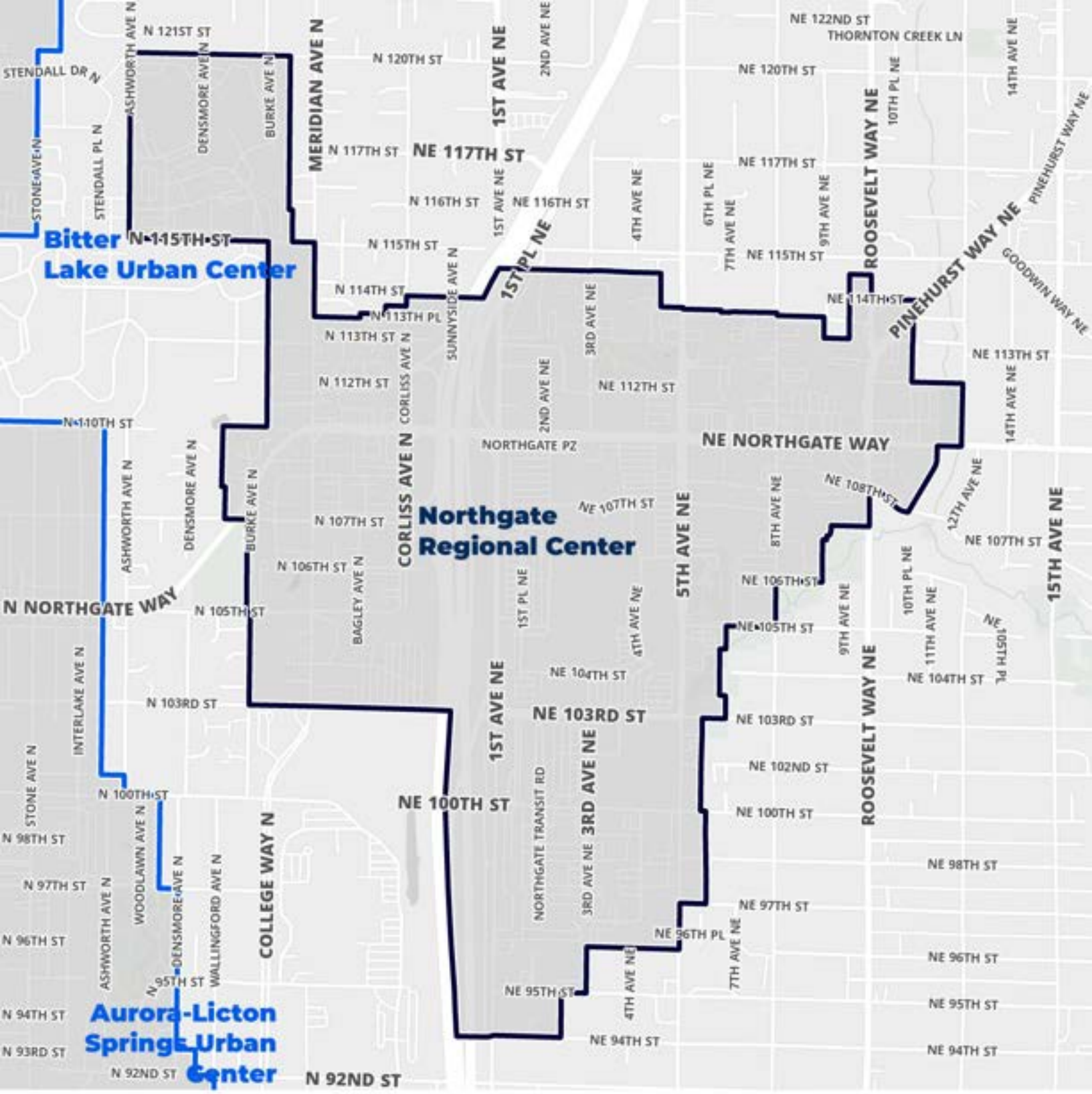
First Hill/Capitol Hill

Proposed boundary

- Neighborhood Center
- Urban Center
- Regional Center

Existing center boundary

Map prepared by OPCD, May 2025.



Northgate

Proposed boundary

- Neighborhood Center
- Urban Center
- Regional Center

Existing center boundary

Map prepared by OPCD, May 2025.

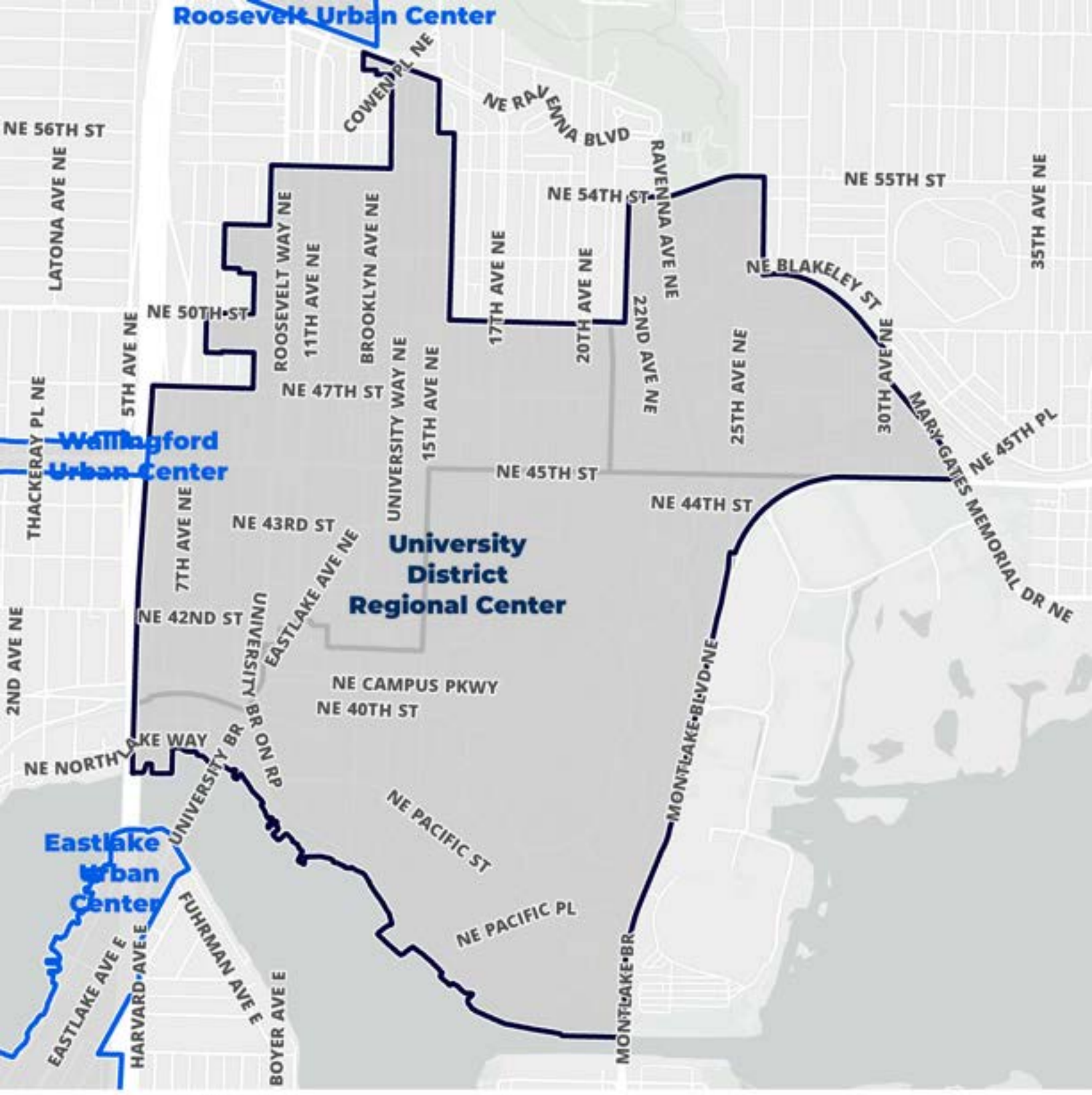
South Lake Union

Proposed boundary

- Neighborhood Center
- Urban Center
- Regional Center

Existing center boundary

Map prepared by OPCD, May 2025.



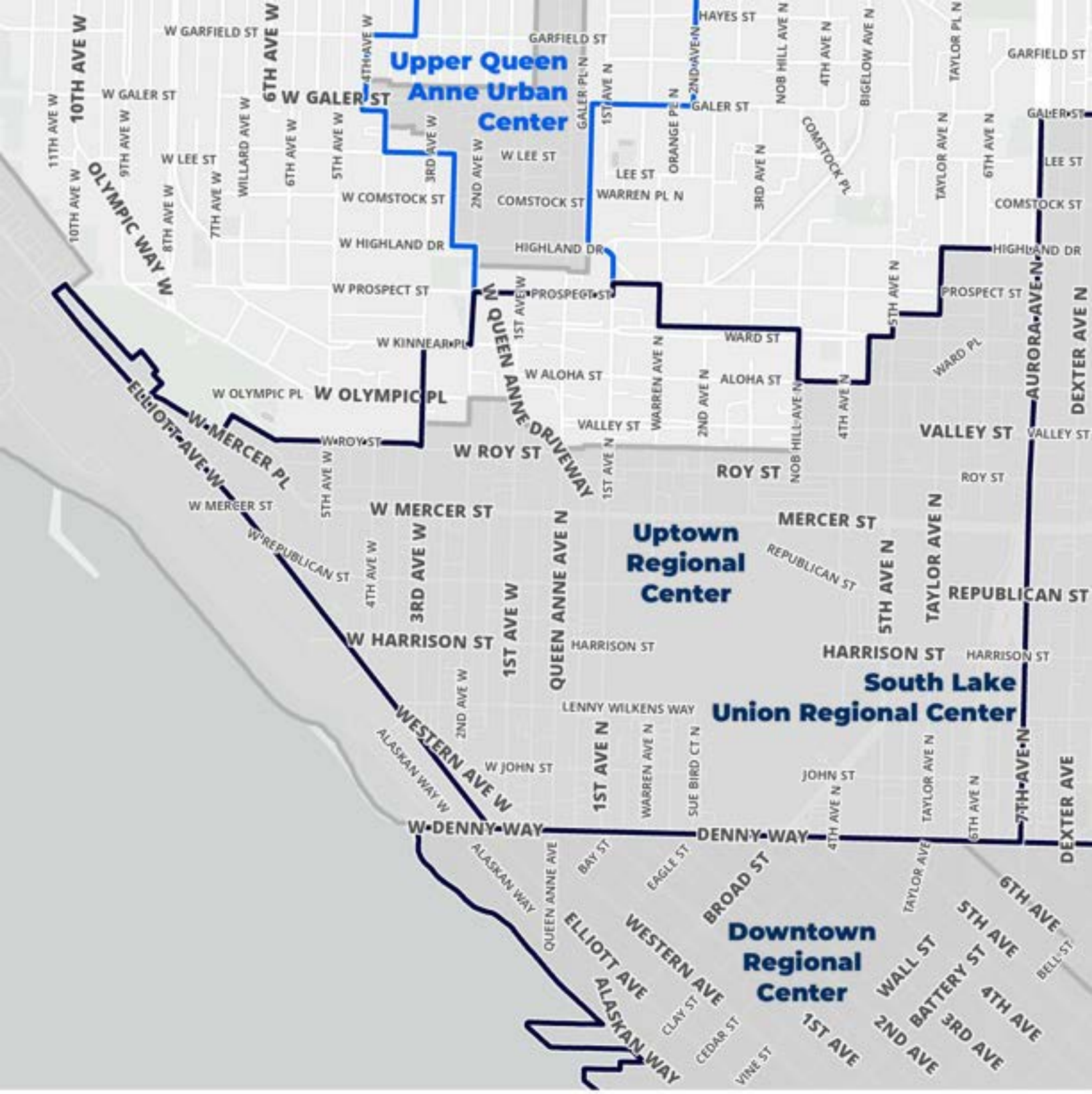
University District

Proposed boundary

- Neighborhood Center
- Urban Center
- Regional Center

Existing center boundary

Map prepared by OPCD, May 2025.



Uptown

Proposed boundary

- Neighborhood Center
- Urban Center
- Regional Center

Existing center boundary

Map prepared by OPCD, May 2025.

Judkins Park

Proposed boundary

- Neighborhood Center
- Urban Center
- Regional Center

Existing center boundary

Map prepared by OPCD, May 2025.

Central District

Proposed boundary

- Neighborhood Center
- Urban Center
- Regional Center

Existing center boundary

3724

Map prepared by OPCD, May 2025.

Admiral

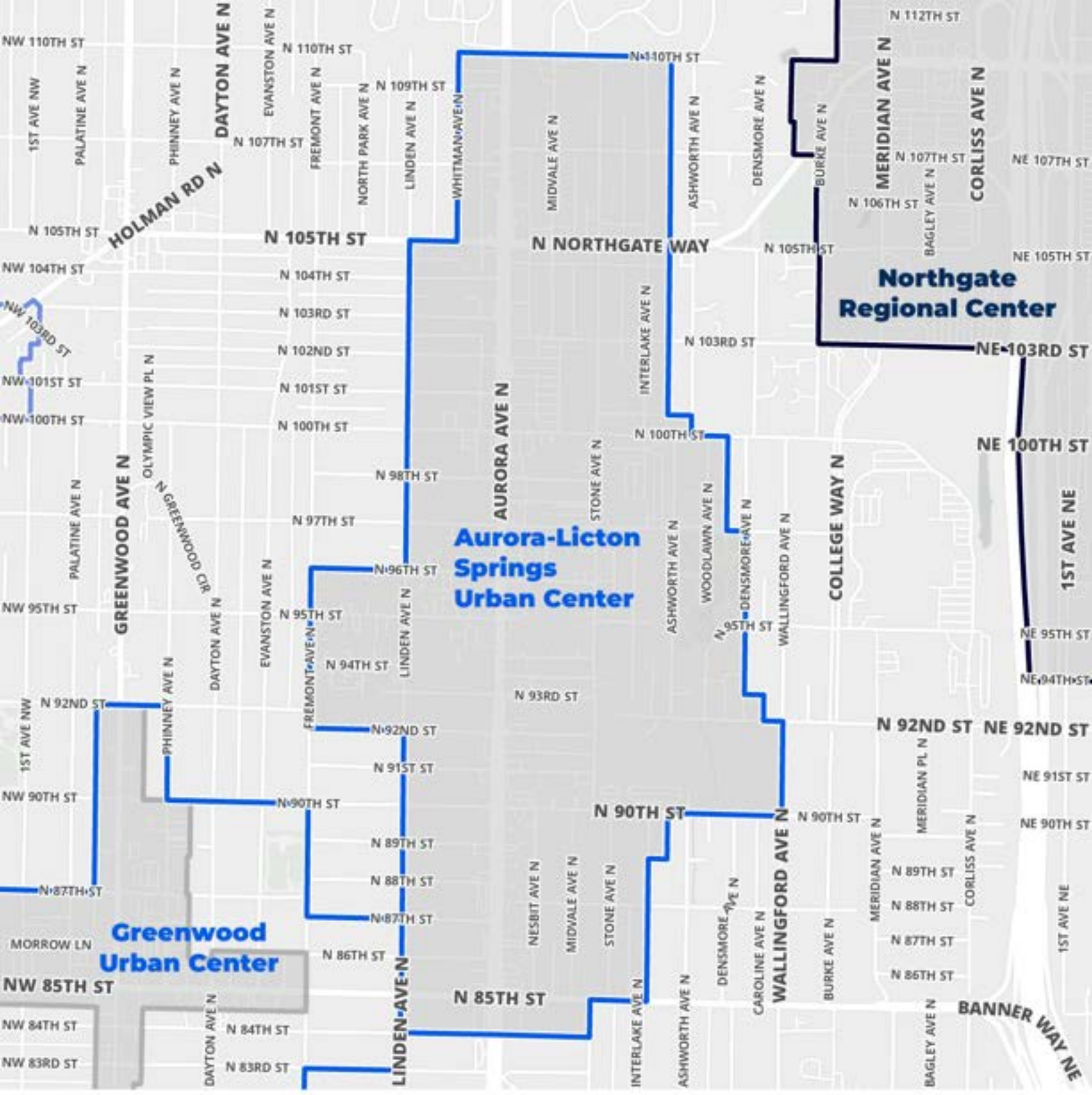
Proposed boundary

- Neighborhood Center
- Urban Center
- Regional Center

Existing center boundary

3725

Map prepared by OPCD, May 2025.



Aurora-Licton Springs

Proposed boundary

- Neighborhood Center
- Urban Center
- Regional Center

Existing center boundary

Map prepared by OPCD, May 2025.

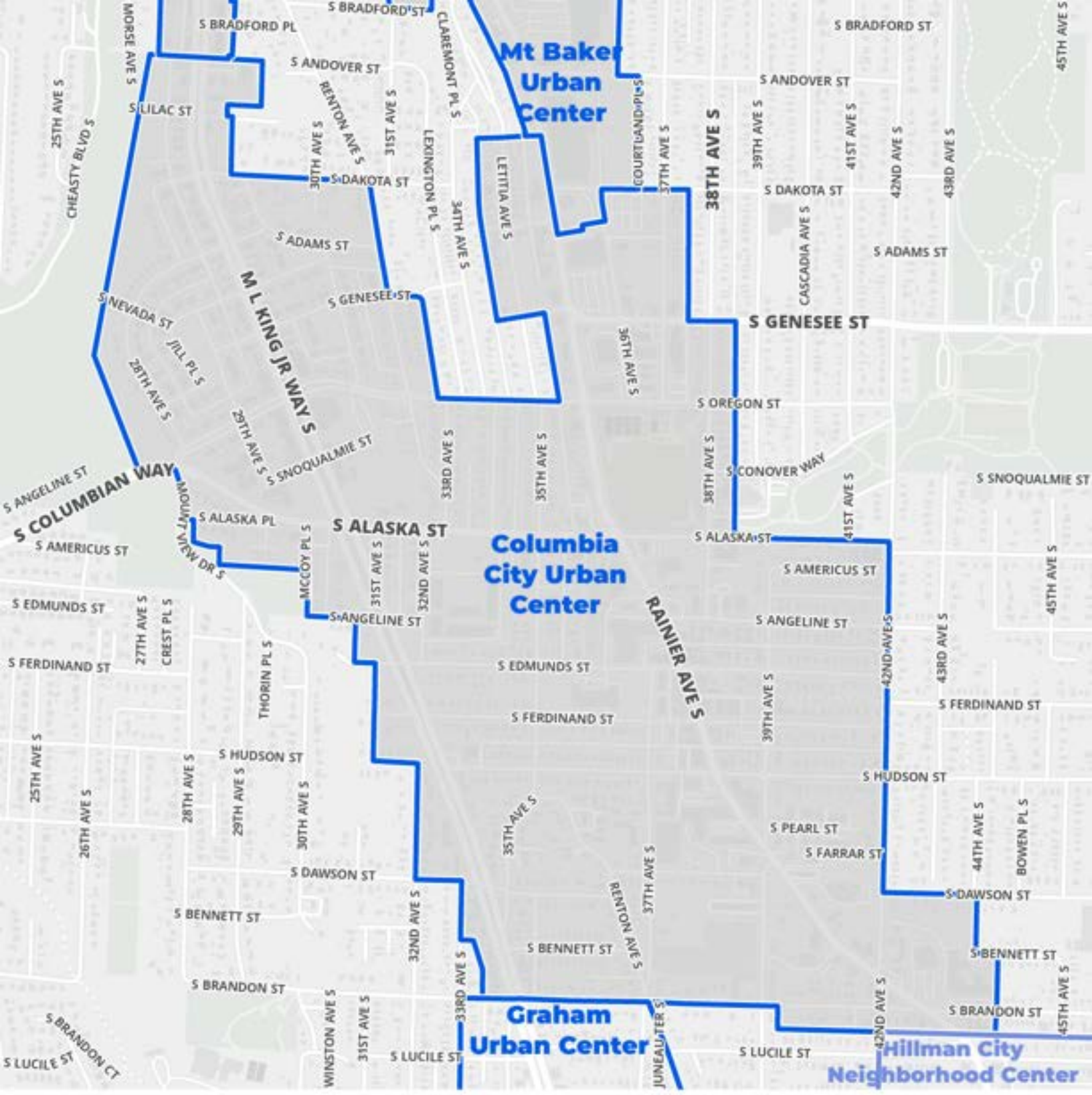
Bitter Lake

Proposed boundary

- Neighborhood Center
- Urban Center
- Regional Center

Existing center boundary

Map prepared by OPCD, May 2025.



Columbia City

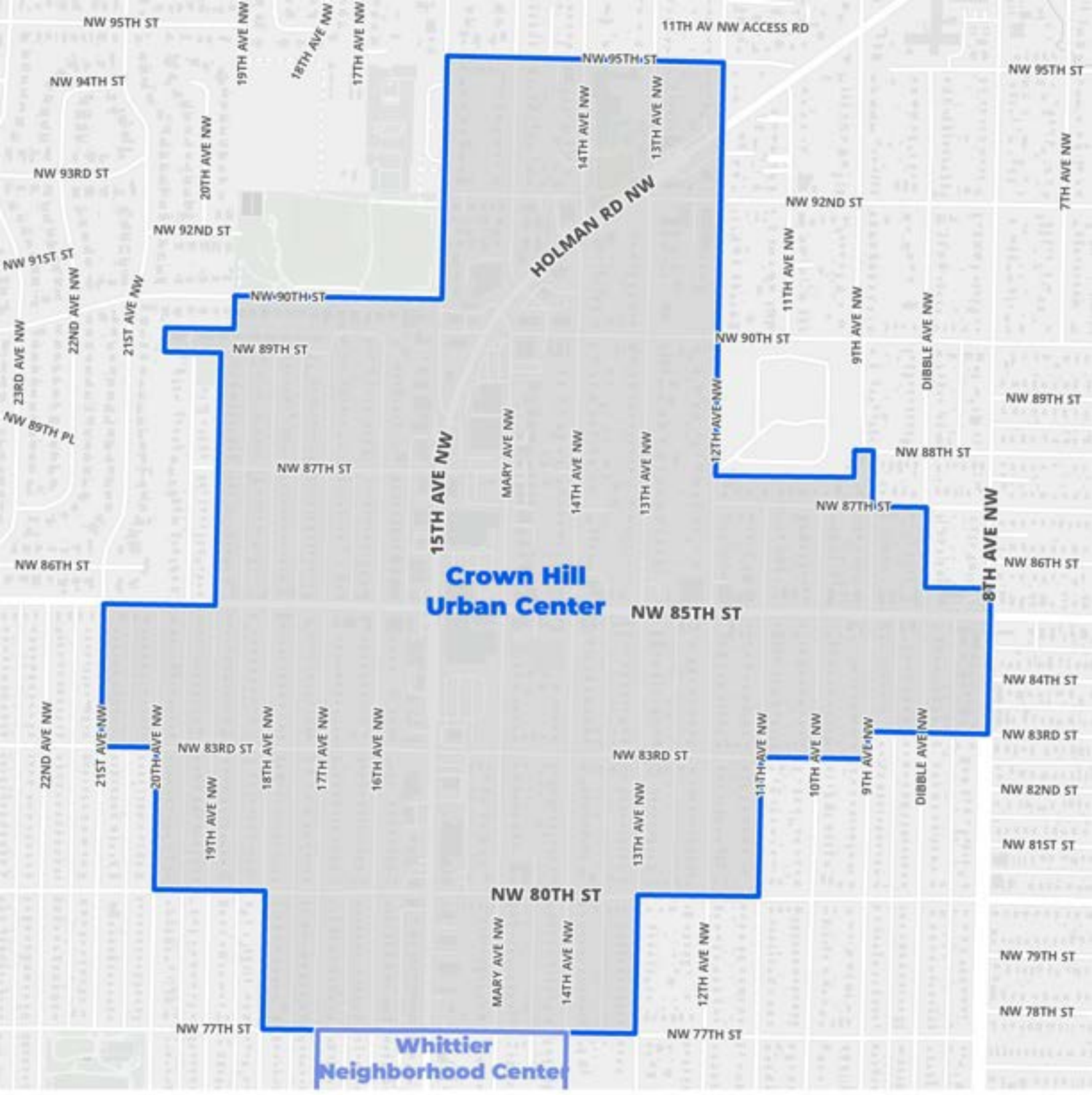
Proposed boundary

- Neighborhood Center
- Urban Center
- Regional Center

Existing center boundary

3728

Map prepared by OPCD, May 2025.



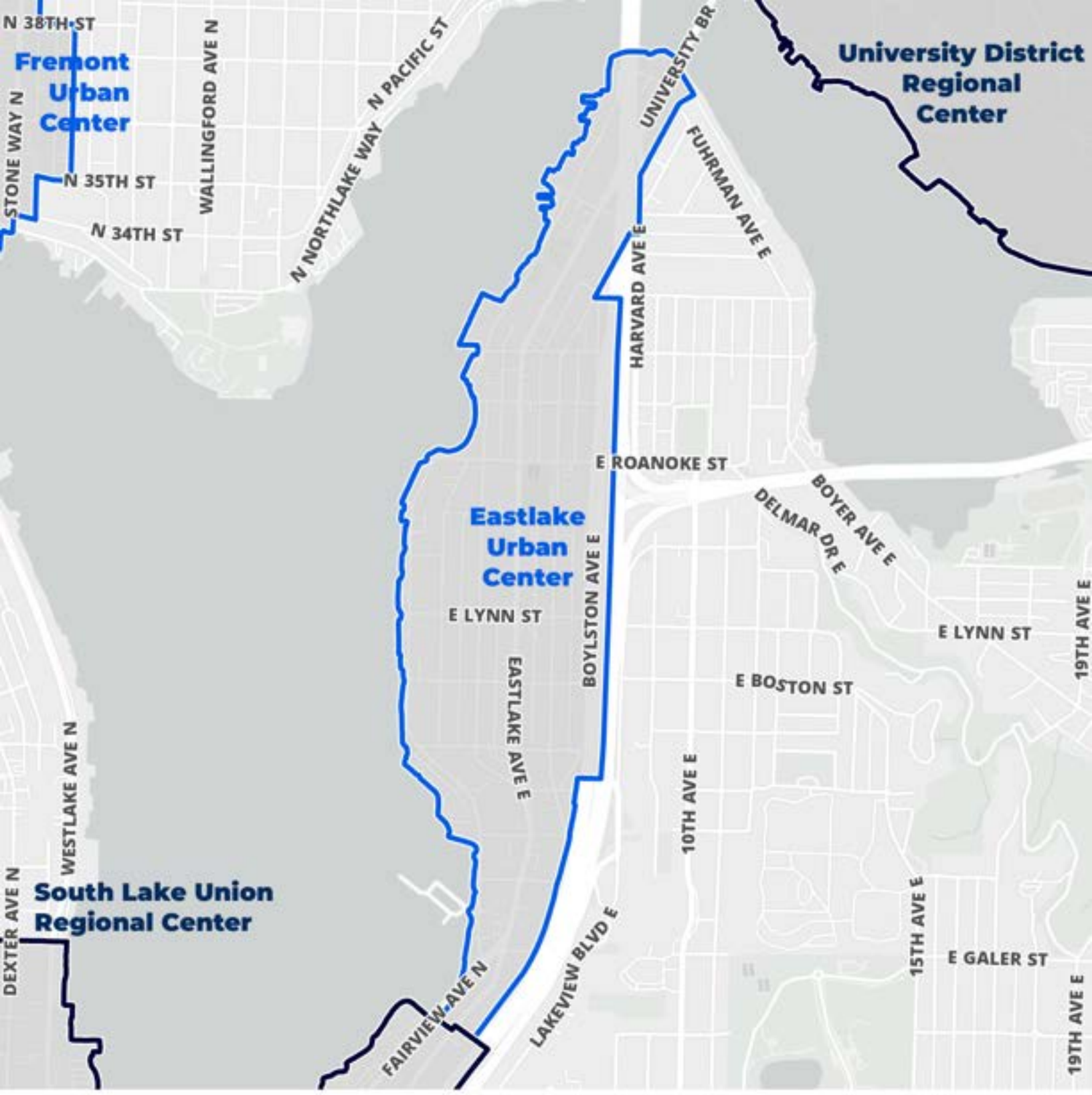
Crown Hill

Proposed boundary

- Neighborhood Center
- Urban Center
- Regional Center

Existing center boundary

Map prepared by OPCD, May 2025.



Eastlake

Proposed boundary

- Neighborhood Center
- Urban Center
- Regional Center

Existing center boundary

Map prepared by OPCD, May 2025.

Fremont

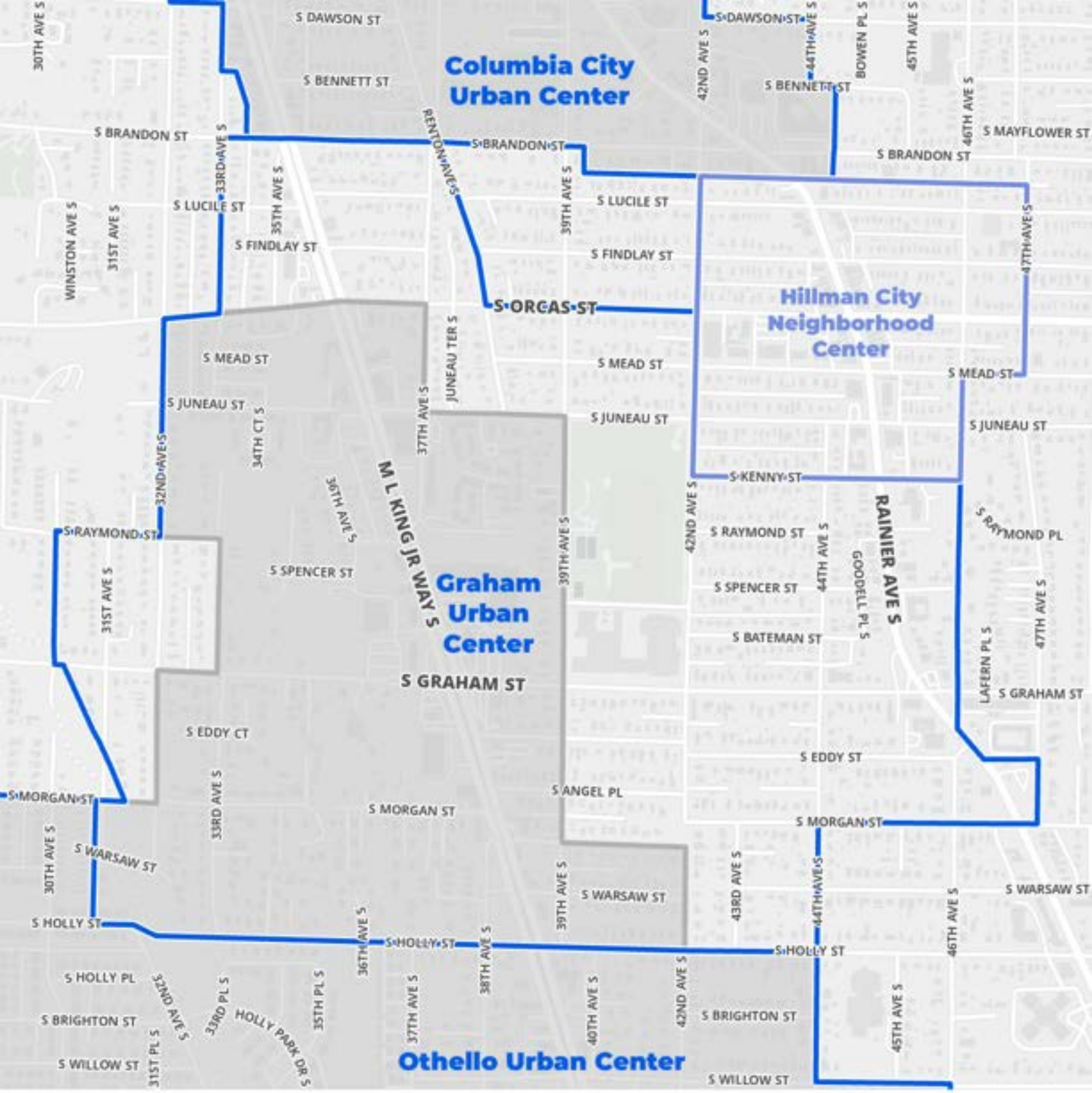
Proposed boundary

- Neighborhood Center
- Urban Center
- Regional Center

Existing center boundary

3731

Map prepared by OPCD, May 2025.



Graham

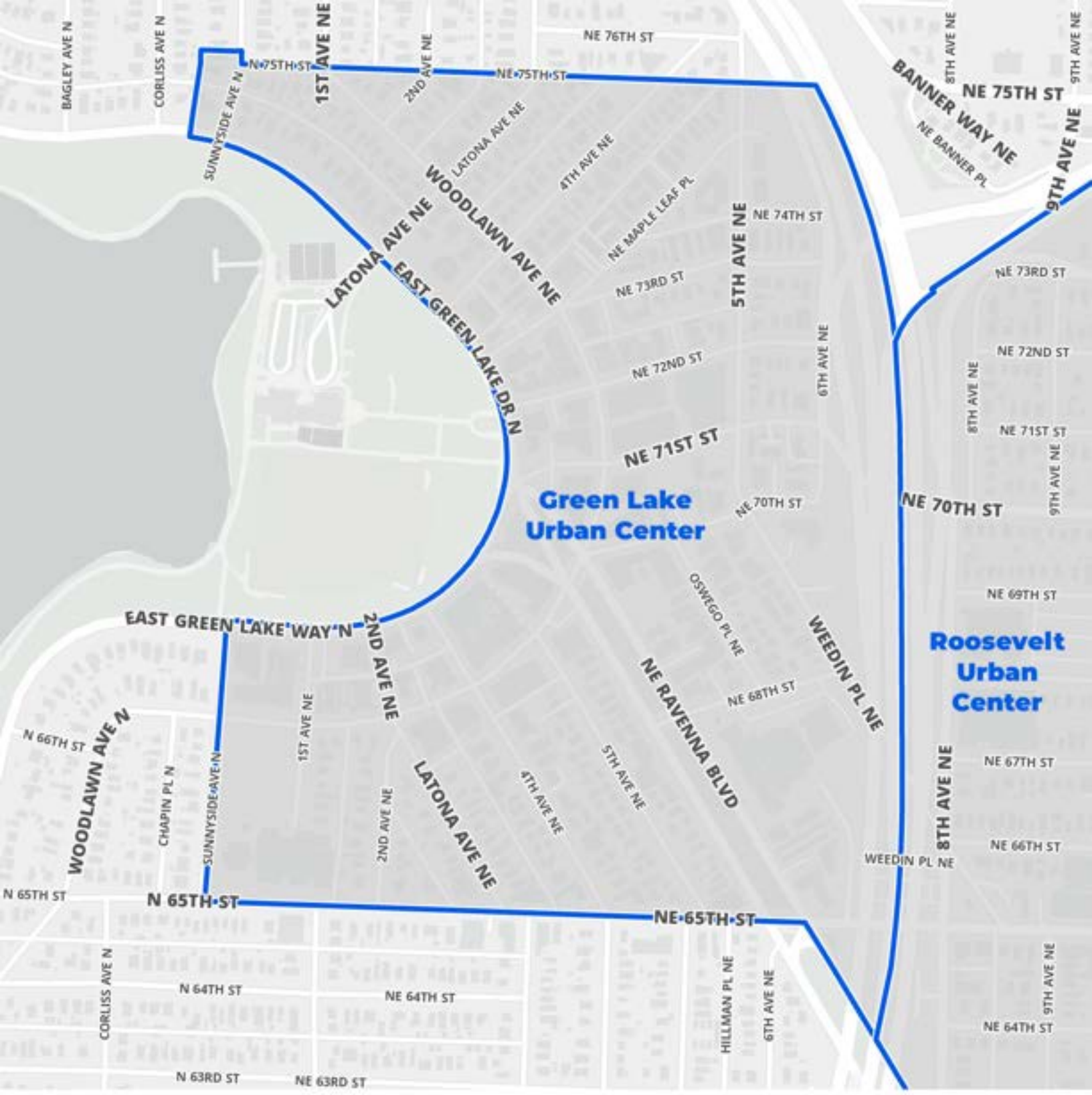
Proposed boundary

- Neighborhood Center
- Urban Center
- Regional Center

Existing center boundary

3732

Map prepared by OPCD, May 2025.



Green Lake

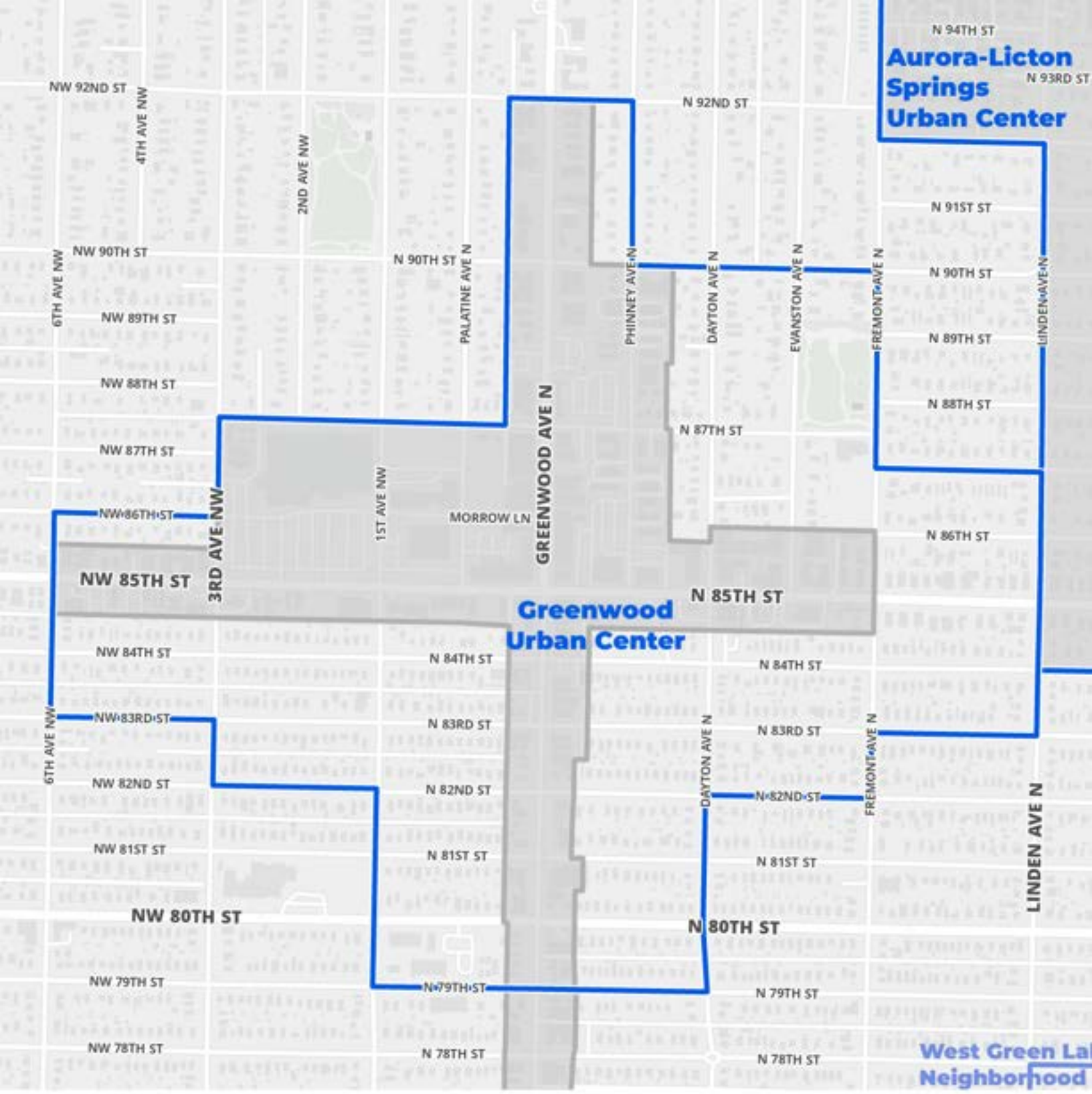
Proposed boundary

- Neighborhood Center
- Urban Center
- Regional Center

Existing center boundary

3733

Map prepared by OPCD, May 2025.



Greenwood

Proposed boundary

- Neighborhood Center
- Urban Center
- Regional Center

Existing center boundary

3734

Map prepared by OPCD, May 2025.

Lake City

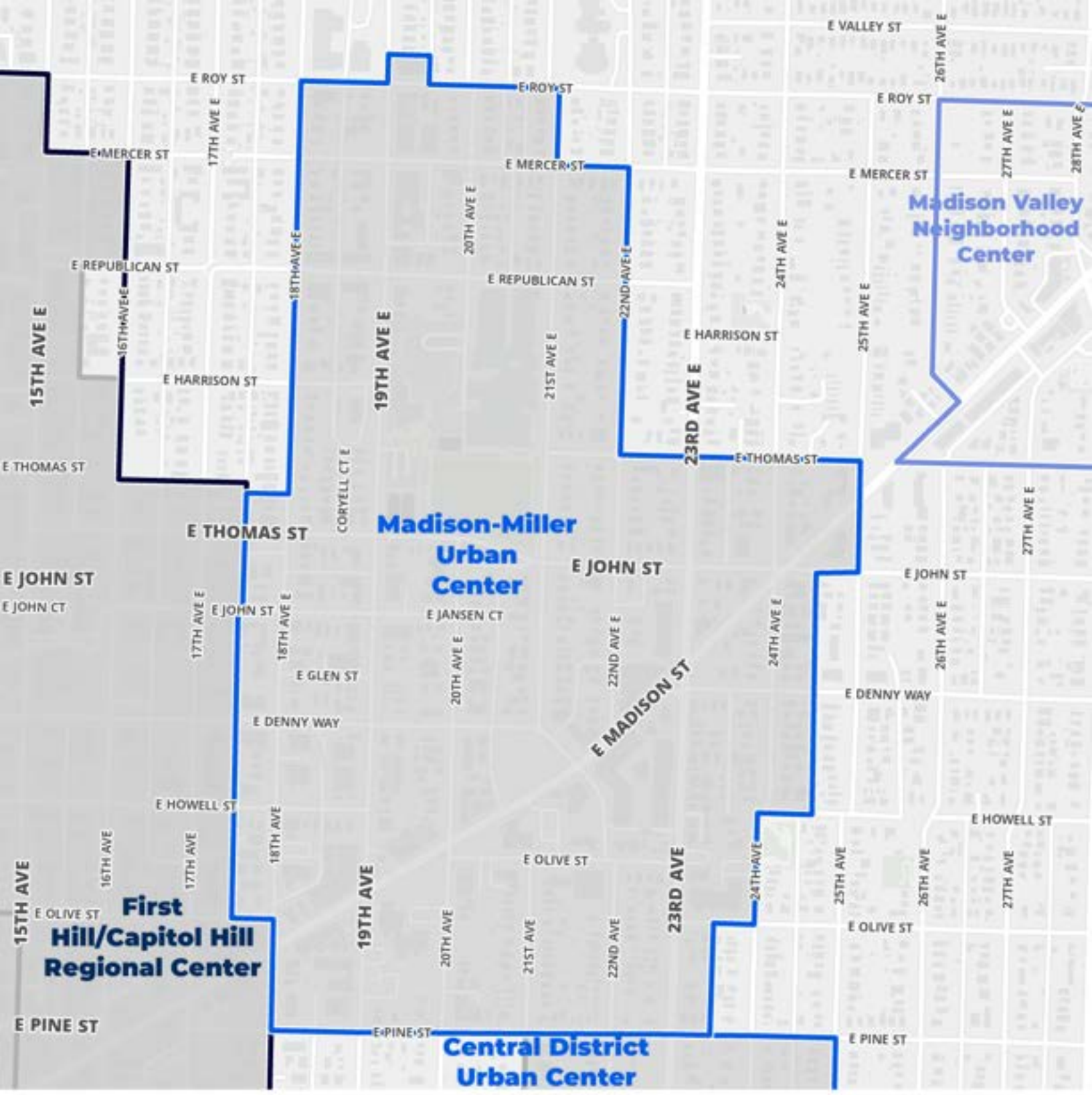
Proposed boundary

- Neighborhood Center
- Urban Center
- Regional Center

Existing center boundary

3735

Map prepared by OPCD, May 2025.



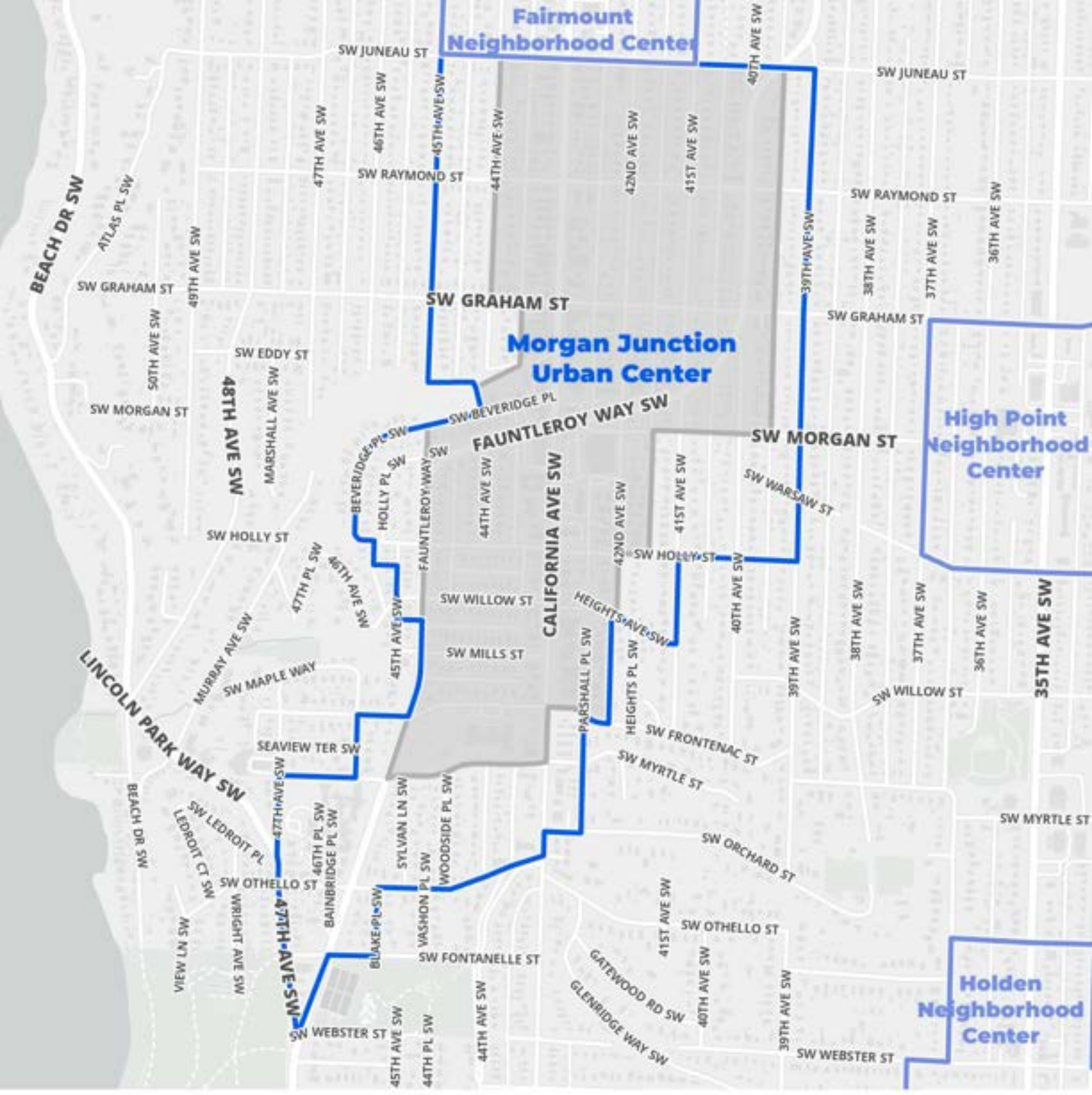
Madison-Miller

Proposed boundary

- Neighborhood Center
- Urban Center
- Regional Center

Existing center boundary

Map prepared by OPCD, May 2025.



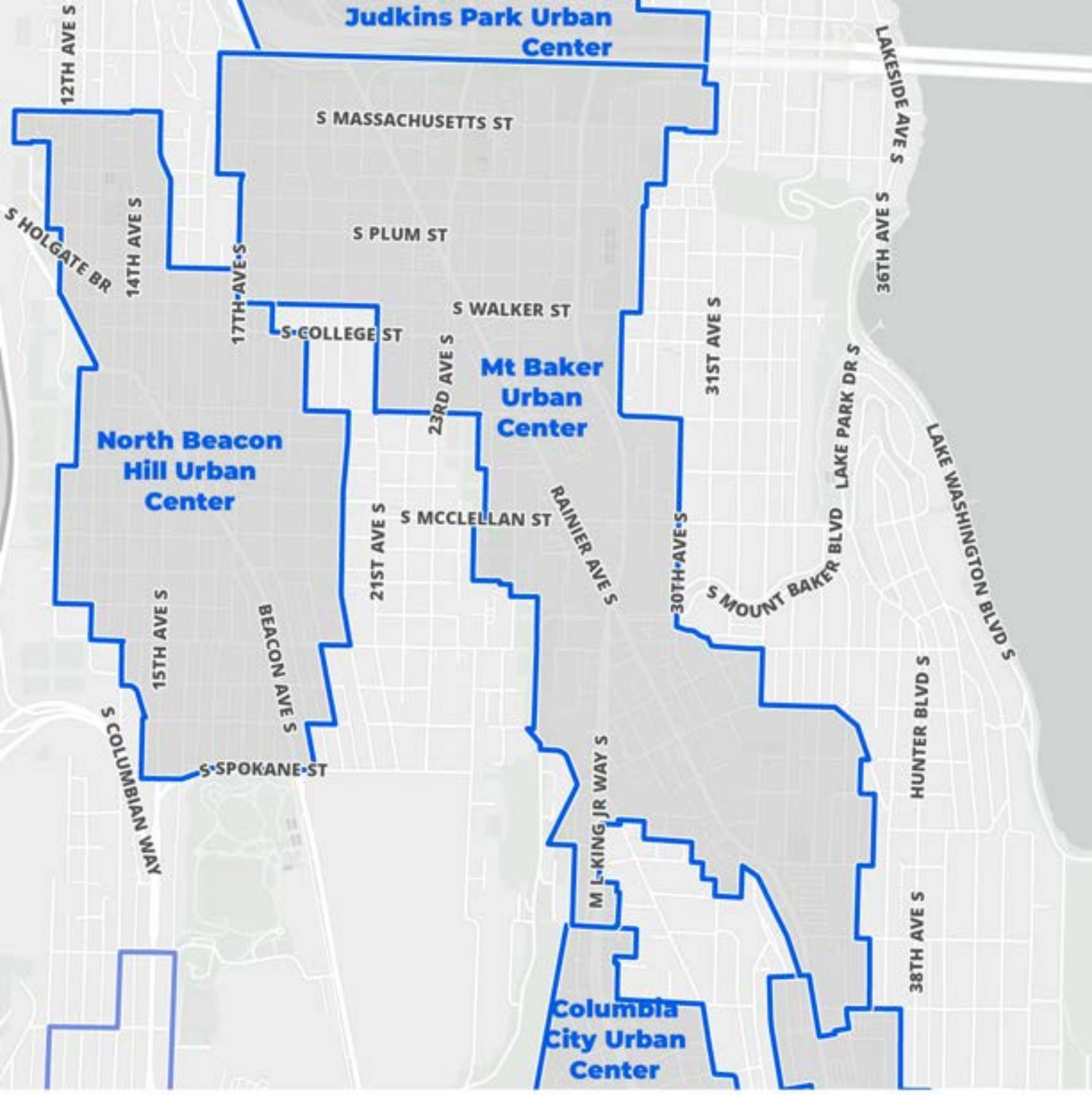
Morgan Junction

Proposed boundary

- Neighborhood Center
- Urban Center
- Regional Center

Existing center boundary

Map prepared by OPCD, May 2025.



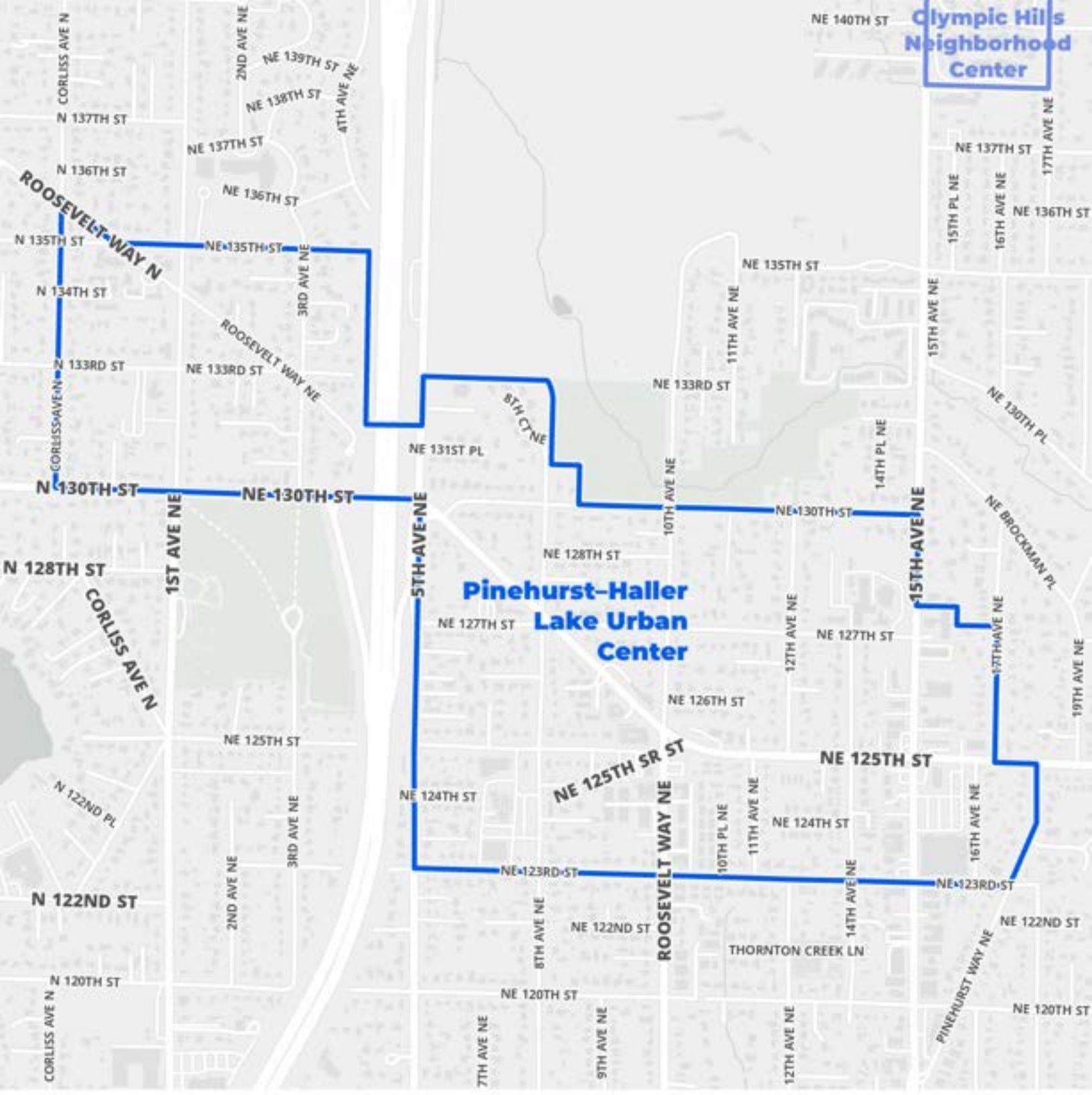
Mt Baker

Proposed boundary

- Neighborhood Center
- Urban Center
- Regional Center

Existing center boundary

Map prepared by OPCD, May 2025.



Pinehurst–Haller Lake

Proposed boundary

- Neighborhood Center
- Urban Center
- Regional Center

Existing center boundary

3739

Map prepared by OPCD, May 2025.

North Beacon Hill

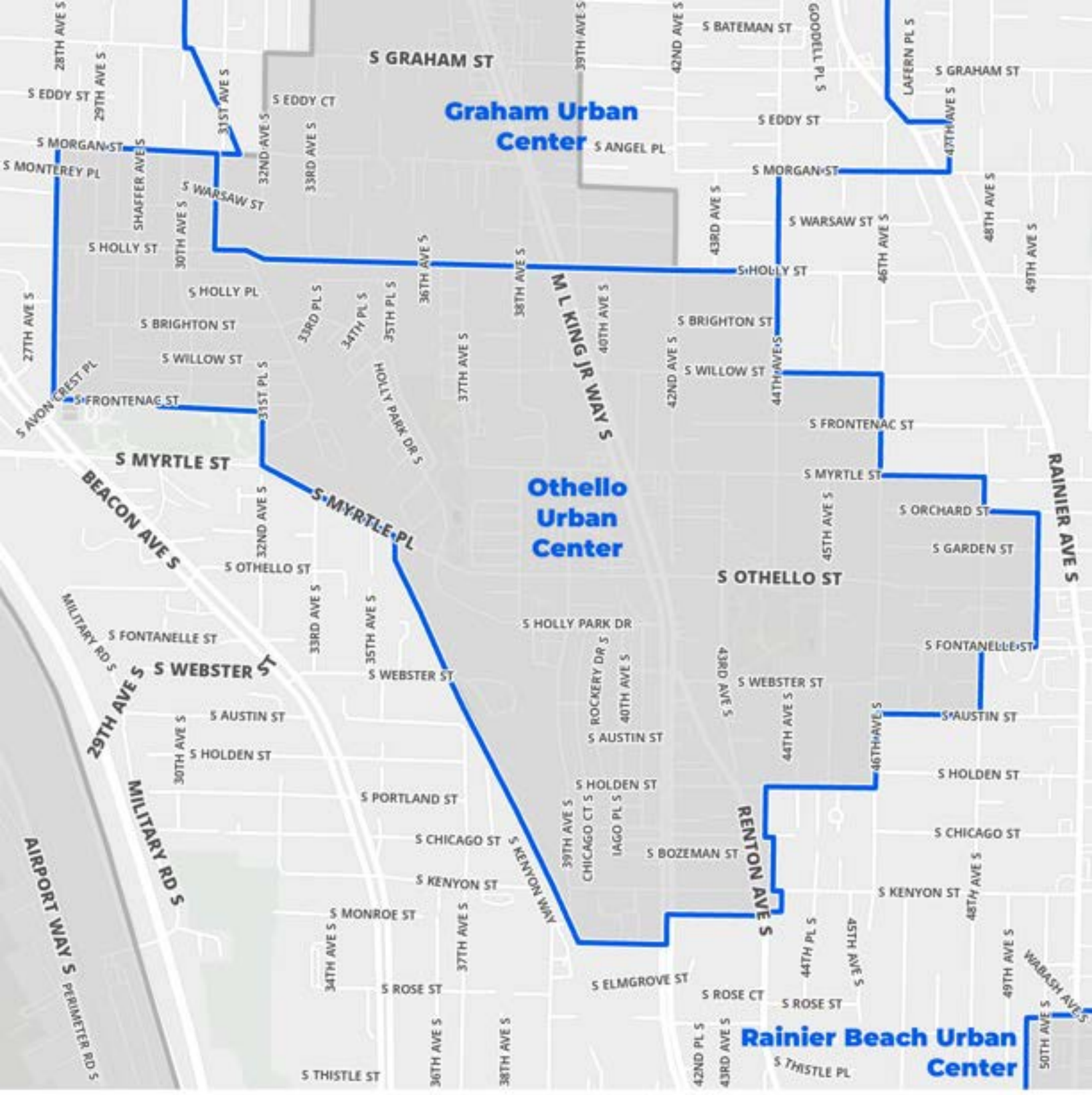
Proposed boundary

- Neighborhood Center
- Urban Center
- Regional Center

Existing center boundary

3740

Map prepared by OPCD, May 2025.



Othello

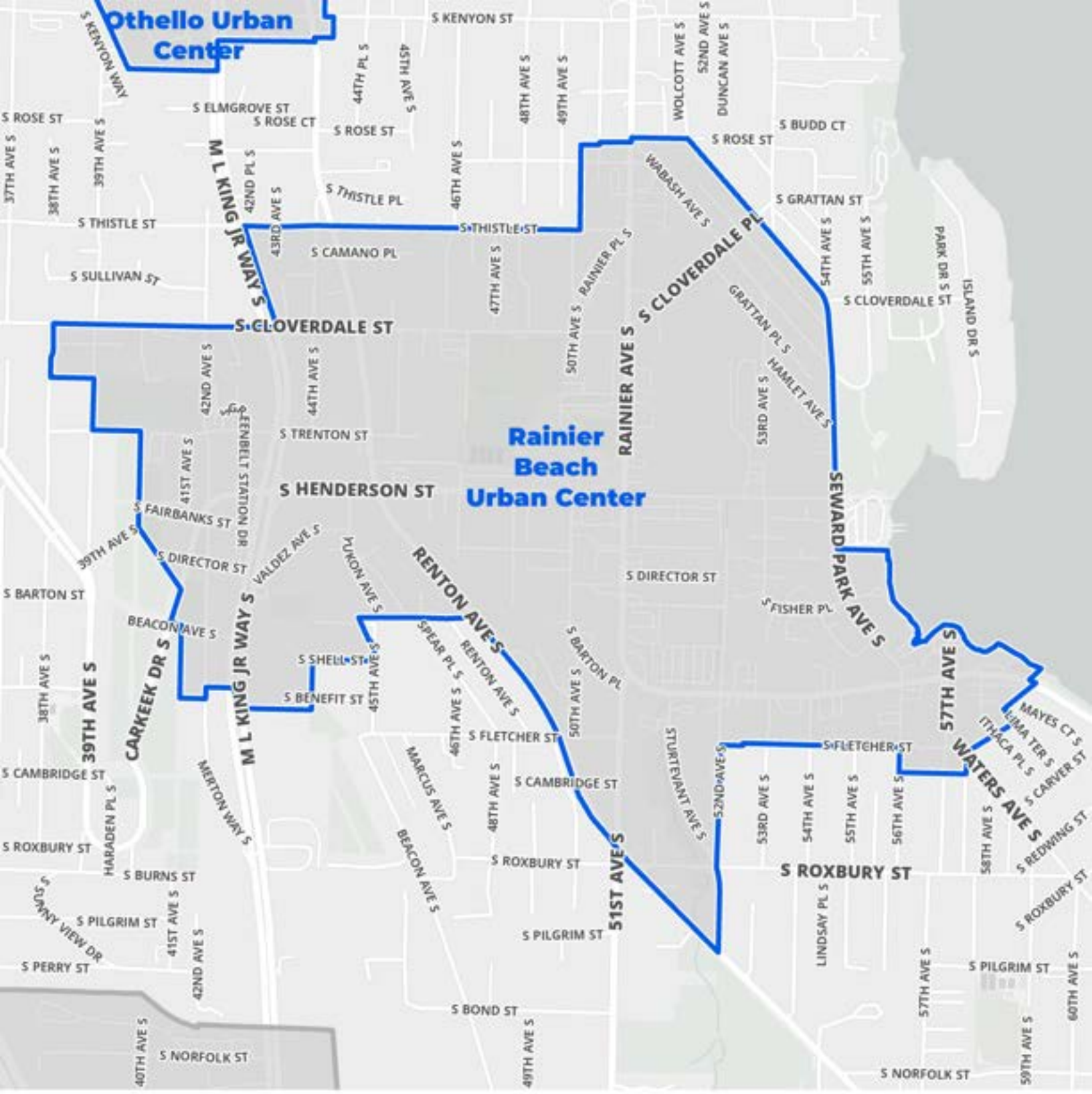
Proposed boundary

- Neighborhood Center
- Urban Center
- Regional Center

Existing center boundary

3741

Map prepared by OPCD, May 2025.



Rainier Beach

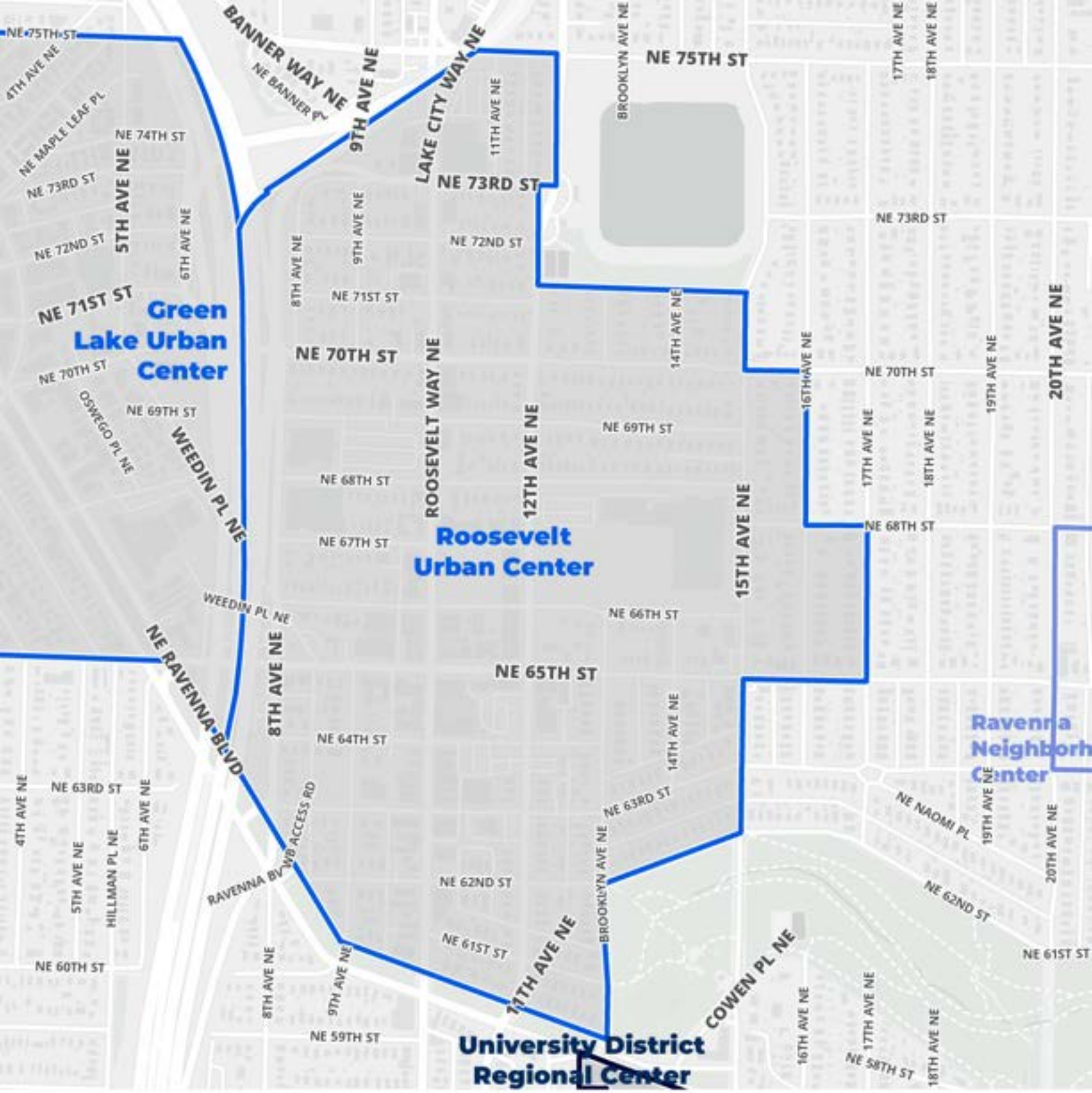
Proposed boundary

- Neighborhood Center
- Urban Center
- Regional Center

Existing center boundary

3742

Map prepared by OPCD, May 2025.



Roosevelt

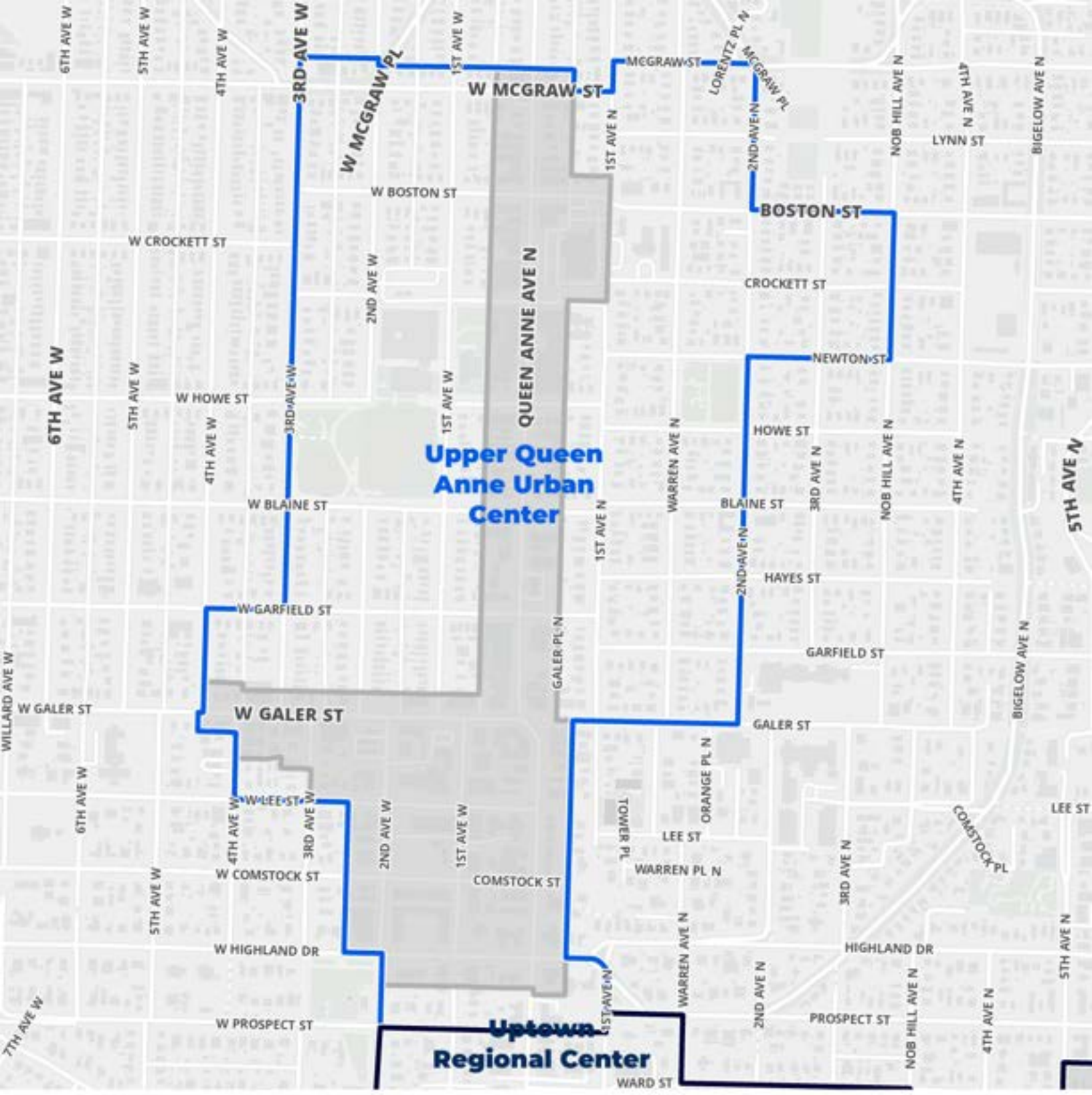
Proposed boundary

- Neighborhood Center
- Urban Center
- Regional Center

Existing center boundary

3743

Map prepared by OPCD, May 2025.



Upper Queen Anne

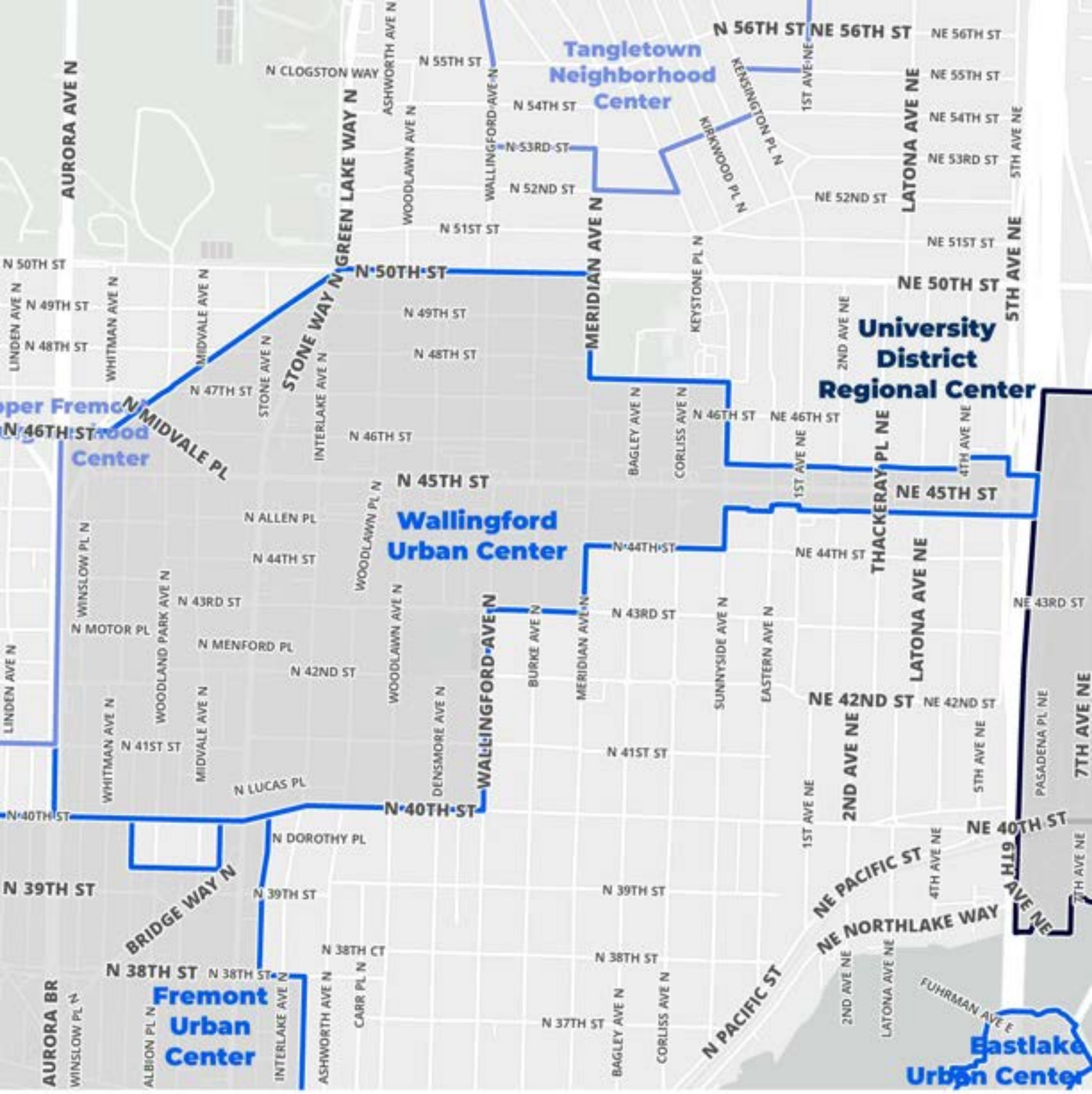
Proposed boundary

- Neighborhood Center
- Urban Center
- Regional Center

Existing center boundary

3744

Map prepared by OPCD, May 2025.



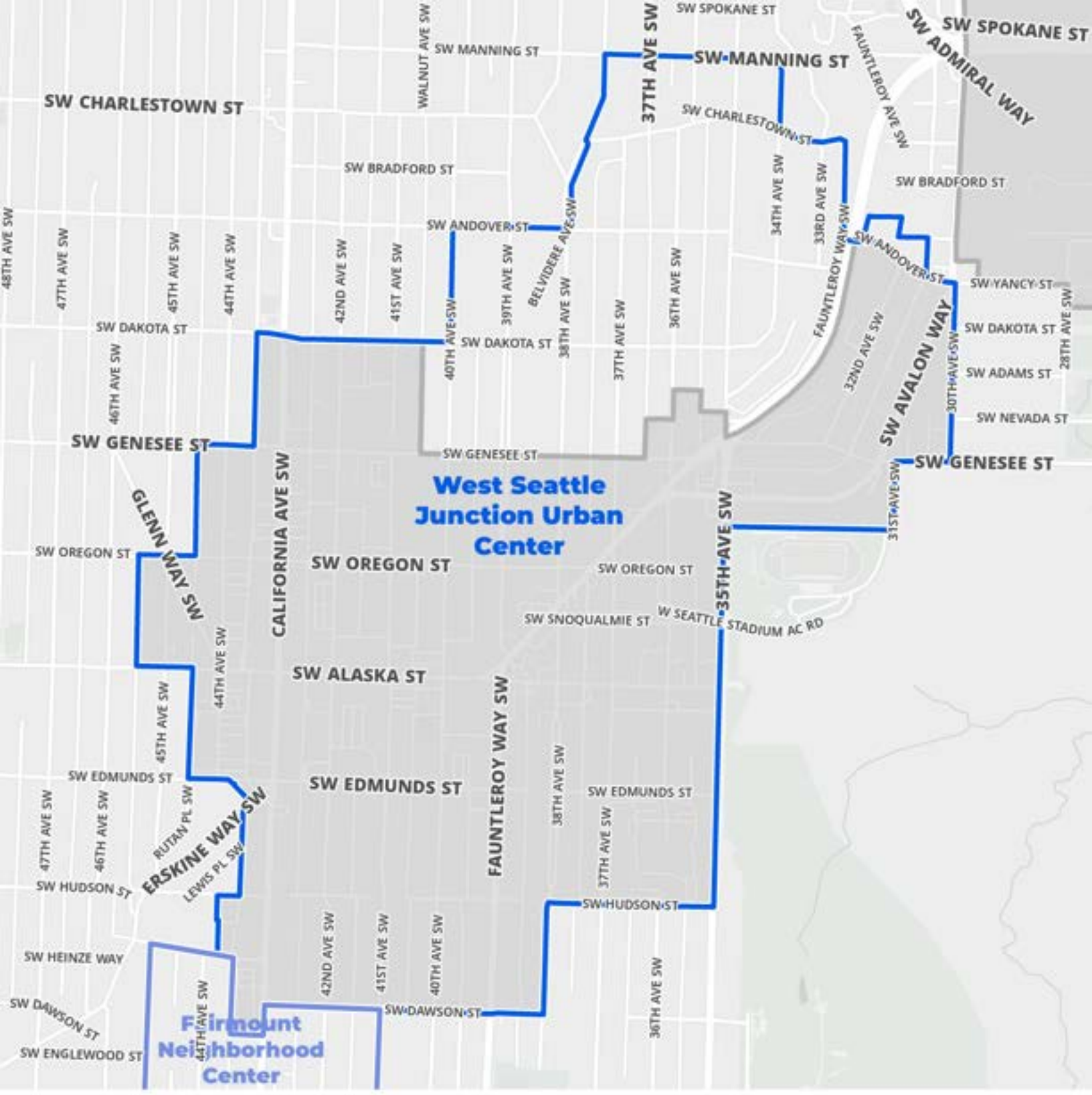
Wallingford

Proposed boundary

- Neighborhood Center
- Urban Center
- Regional Center

Existing center boundary

Map prepared by OPCD, May 2025.



West Seattle Junction

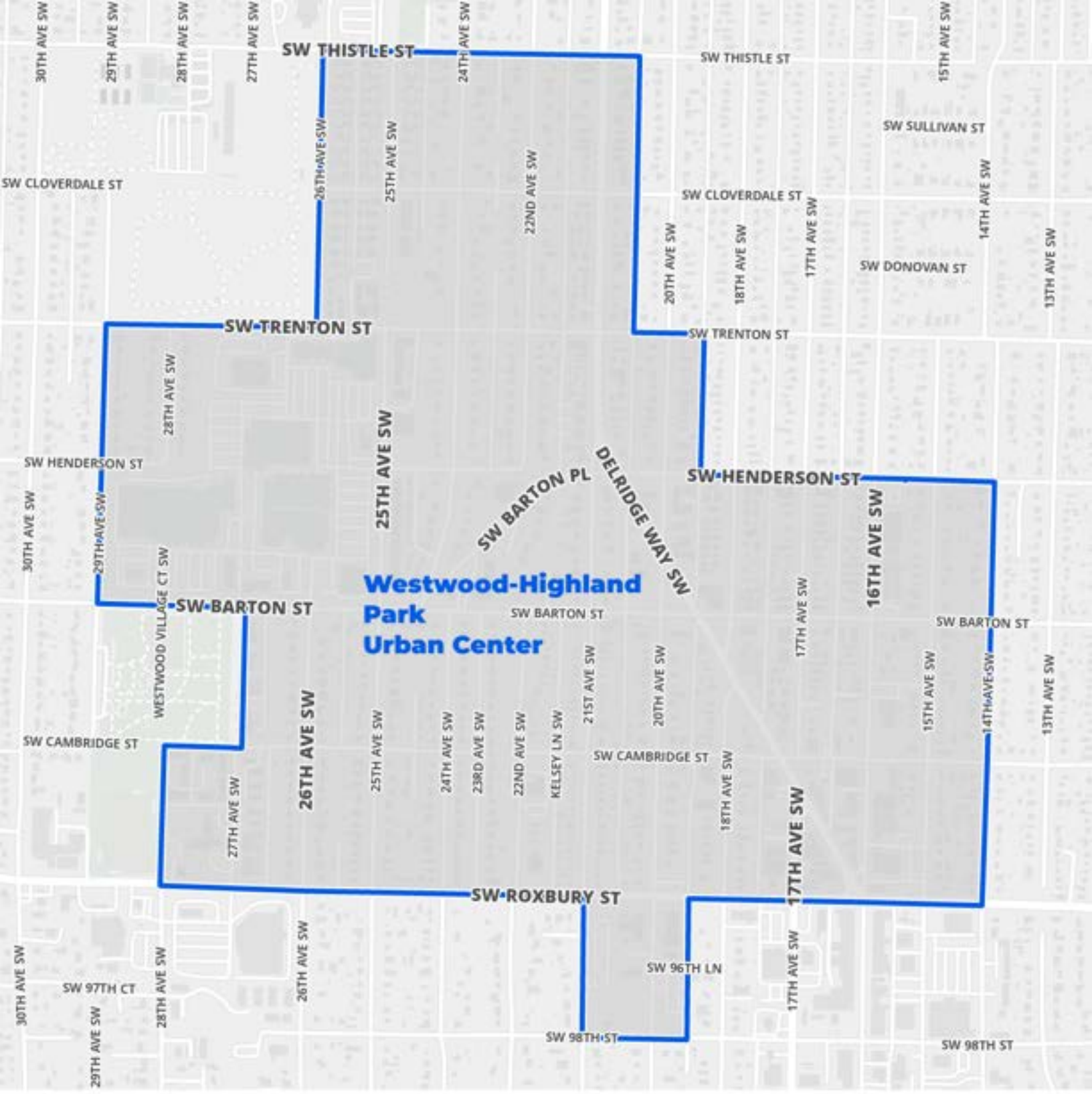
Proposed boundary

- Neighborhood Center
- Urban Center
- Regional Center

Existing center boundary

3746

Map prepared by OPCD, May 2025.



Westwood-Highland Park

Proposed boundary

- Neighborhood Center
- Urban Center
- Regional Center

Existing center boundary

3747

Map prepared by OPCD, May 2025.

Legislation Text

File #: CB 120993, **Version:** 1

AN ORDINANCE relating to land use and zoning; implementing a major update of Neighborhood Residential zones and modifying development standards in other zones to comply with various state laws; amending Chapter 23.32 of the Seattle Municipal Code at pages 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 98, 99, 100, 102, 103, 104, 105, 106, 107, 111, 112, 113, 114, 117, 118, 119, 120, 121, 122, 123, 124, 125, 126, 131, 132, 133, 134, 135, 136, 137, 138, 139, 140, 143, 144, 145, 146, 147, 148, 149, 150, 151, 152, 153, 156, 157, 158, 159, 160, 161, 162, 163, 164, 165, 166, 167, 168, 170, 171, 172, 173, 174, 175, 176, 177, 178, 179, 180, 181, 182, 183, 184, 186, 187, 188, 189, 190, 191, 192, 193, 194, 195, 196, 197, 198, 199, 200, 201, 203, 204, 205, 206, 207, 208, 209, 210, 211, 212, 213, 214, 216, 217, 219, 220, and 221 of the Official Land Use Map; amending Chapters 6.600, 14.08, 14.09, 15.32, 21.49, 22.214, 22.801, 22.907, 23.22, 23.24, 23.28, 23.30, 23.34, 23.42, 23.45, 23.47A, 23.48, 23.49, 23.50, 23.51A, 23.51B, 23.53, 23.54, 23.58C, 23.60A, 23.66, 23.72, 23.75, 23.76, 23.80, 23.84A, 23.86, 23.90, 23.91, 25.09, and 25.11 of the Seattle Municipal Code; renumbering existing subsection 23.54.015.K of the Seattle Municipal Code as Section 23.54.037 and further amending the section; renumbering existing subsections 23.54.030.F, 23.54.030.G, 23.54.030.K, and 23.54.030.L as Sections 23.54.031, 23.54.032, 23.54.033, and 23.54.034 and further amending the sections; repealing Chapter 23.44 and Sections 23.34.010, 23.34.012, 23.34.013, 23.34.072, 23.42.130, 23.45.512, 23.45.531, 23.86.010, and 25.09.260 of the Seattle Municipal Code; adding a new Chapter 23.44 and new Sections 23.42.024, 23.42.132, 23.45.519, 23.80.006, 23.80.008, 23.80.010, 25.09.055, and 25.11.025 to the Seattle Municipal Code; and repealing Ordinance 127219.

Full text of the legislation is attached.

CITY OF SEATTLE

ORDINANCE _____

COUNCIL BILL _____

..title

AN ORDINANCE relating to land use and zoning; implementing a major update of Neighborhood Residential zones and modifying development standards in other zones to comply with various state laws; amending Chapter 23.32 of the Seattle Municipal Code at pages 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 98, 99, 100, 102, 103, 104, 105, 106, 107, 111, 112, 113, 114, 117, 118, 119, 120, 121, 122, 123, 124, 125, 126, 131, 132, 133, 134, 135, 136, 137, 138, 139, 140, 143, 144, 145, 146, 147, 148, 149, 150, 151, 152, 153, 156, 157, 158, 159, 160, 161, 162, 163, 164, 165, 166, 167, 168, 170, 171, 172, 173, 174, 175, 176, 177, 178, 179, 180, 181, 182, 183, 184, 186, 187, 188, 189, 190, 191, 192, 193, 194, 195, 196, 197, 198, 199, 200, 201, 203, 204, 205, 206, 207, 208, 209, 210, 211, 212, 213, 214, 216, 217, 219, 220, and 221 of the Official Land Use Map; amending Chapters 6.600, 14.08, 14.09, 15.32, 21.49, 22.214, 22.801, 22.907, 23.22, 23.24, 23.28, 23.30, 23.34, 23.42, 23.45, 23.47A, 23.48, 23.49, 23.50, 23.51A, 23.51B, 23.53, 23.54, 23.58C, 23.60A, 23.66, 23.72, 23.75, 23.76, 23.80, 23.84A, 23.86, 23.90, 23.91, 25.09, and 25.11 of the Seattle Municipal Code; renumbering existing subsection 23.54.015.K of the Seattle Municipal Code as Section 23.54.037 and further amending the section; renumbering existing subsections 23.54.030.F, 23.54.030.G, 23.54.030.K, and 23.54.030.L as Sections 23.54.031, 23.54.032, 23.54.033, and 23.54.034 and further amending the sections; repealing Chapter 23.44 and Sections 23.34.010, 23.34.012, 23.34.013, 23.34.072, 23.42.130, 23.45.512, 23.45.531, 23.86.010, and 25.09.260 of the Seattle Municipal Code; adding a new Chapter 23.44 and new Sections 23.42.024, 23.42.132, 23.45.519, 23.80.006, 23.80.008, 23.80.010, 25.09.055, and 25.11.025 to the Seattle Municipal Code; and repealing Ordinance 127219.

..body

WHEREAS, the Office of Planning and Community Development, in cooperation with other City agencies including the Seattle Planning Commission, began in 2022 a series of programs and events, under the title One Seattle Plan, to engage the public in discussions about potential changes to the Comprehensive Plan, consistent with the One Seattle Plan Public Participation Plan and documented in the One Seattle Plan Public Engagement Report; and

WHEREAS, in April 2021, the Washington State Legislature passed Chapter 300, Laws of 2021 (also known as House Bill 1287), which directed the Building Code Council to adopt rules for electric vehicle infrastructure requirements; and

WHEREAS, the Office of Planning and Community Development held a scoping period for the Environmental Impact Statement from June 23 to August 22, 2022; and

WHEREAS, in April 2023, the Washington State Legislature passed Chapter 322, Laws of 2023 (also known as House Bill 1110), which amended the Growth Management Act to require certain cities, including Seattle, to allow the development of "middle housing" in all residential areas, including at least four units on each lot and at least six units per lot near transit or when at least two units are affordable; and

WHEREAS, in April 2023, the Washington State Legislature passed Chapter 333, Laws of 2023 (also known as House Bill 1293), which imposes limits on design review and requires that design standards be clear and objective; and

WHEREAS, in April 2023, the Washington State Legislature passed Chapter 334, Laws of 2023 (also known as House Bill 1337), which requires cities to remove regulatory barriers to accessory dwelling units; and

WHEREAS, in March 2024, the Washington State Legislature passed Chapter 152, Laws of 2024 (also known as House Bill 2321), which clarified standards implemented through House Bill 1110; and

WHEREAS, in March 2024, the Washington State Legislature passed Chapter 274, Laws of 2024 (also known as Senate Bill 6015), which imposes restrictions on parking requirements; and

WHEREAS, in March 2024, the Office of Planning and Community Development published a Draft Environmental Impact Statement analyzing the potential effects of five different growth alternatives in the city through 2044 and a "no action" alternative, conducted two public hearings, and received comments from the public on this document; and

WHEREAS, in March 2024, the Office of Planning and Community Development published a Draft Comprehensive Plan rooted in a deliberate approach to creating more housing, encouraging density near amenities and frequent transit, and preventing displacement; and

WHEREAS, in Spring 2024, the Office of Planning and Community Development held open houses across all seven council districts and received input from residents and community groups over a two-month public comment period on the draft plan and an initial proposal for updating Neighborhood Residential zones as documented in the One Seattle Plan Public Engagement Report; and

WHEREAS, in Fall 2024, the Office of Planning and Community Development held open houses across all seven council districts and received input from residents and community groups over a two-month public comment period on a revised proposal for updating Neighborhood Residential zones and draft legislation as documented in the One Seattle Plan Public Engagement Report; and

WHEREAS, in January 2025, the Office of Planning and Community Development published a Final Environmental Impact Statement that included analysis of a preferred growth strategy alternative that increased potential housing supply in the city by doubling residential development capacity and that promoted housing supply, variety, and

affordability by adding new and expanded areas for growth in neighborhoods across the city; and

WHEREAS, on March 27, 2025, the Office of Planning and Community Development transmitted legislation to the City Council which would adopt the One Seattle Plan; NOW, THEREFORE,

BE IT ORDAINED BY THE CITY OF SEATTLE AS FOLLOWS:

Section 1. The Official Land Use Map, Chapter 23.32 of the Seattle Municipal Code, is amended to rezone properties on pages 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 98, 99, 100, 102, 103, 104, 105, 106, 107, 111, 112, 113, 114, 117, 118, 119, 120, 121, 122, 123, 124, 125, 126, 131, 132, 133, 134, 135, 136, 137, 138, 139, 140, 143, 144, 145, 146, 147, 148, 149, 150, 151, 152, 153, 156, 157, 158, 159, 160, 161, 162, 163, 164, 165, 166, 167, 168, 170, 171, 172, 173, 174, 175, 176, 177, 178, 179, 180, 181, 182, 183, 184, 186, 187, 188, 189, 190, 191, 192, 193, 194, 195, 196, 197, 198, 199, 200, 201, 203, 204, 205, 206, 207, 208, 209, 210, 211, 212, 213, 214, 216, 217, 219, 220, and 221 of the Official Land Use Map as follows:

A. Properties identified for rezones as shown on Attachment 1 to this ordinance are rezoned as shown in those maps.

B. Except for properties identified to be rezoned as shown on Attachment 1 to this ordinance, all areas identified as “existing zoning” in Table A for Section 1 are rezoned as shown under the “New zoning” column in Table A for Section 1.

Table A for Section 1 Standard zoning changes	
Existing zoning	**New zoning**
RSL (M)	LR1 (M)
NR1	NR
NR2	NR
NR3	NR
NR3-PUD	NR

1. Where the existing zoning includes a Major Institution Overlay, the underlying zoning shall be modified as stated in this subsection 1.B and the Major Institution Overlay shall continue to apply.

2. The rezones in this subsection 1.B shall not remove any existing suffixes other than PUD suffixes.

Section 2. Section 6.600.080 of the Seattle Municipal Code, last amended by Ordinance 126509, is amended as follows:

6.600.080 Bed and breakfast operator general provisions

All bed and breakfast operators who advertise or offer a bed and breakfast unit on a platform in the City, shall comply with the following:

* * *

C. If operating within a ((~~neighborhood residential~~)) Neighborhood Residential zone, comply with all standards provided in ((~~Section 23.44.051~~)) subsection 23.44.020.C. If operating within a ((~~multi-family~~)) multifamily zone, comply with all standards provided in subsection ((~~23.45.545.G~~)) 23.45.504.I.

* * *

Section 3. Section 14.08.020 of the Seattle Municipal Code, last amended by Ordinance 126767, is amended as follows:

14.08.020 Definitions

Definitions as used in this Chapter 14.08, unless additional meaning clearly appears from the context, shall have the meanings subscribed:

"Accessory dwelling unit" has the meaning defined in ((~~Chapter 23.84A.032's definition of "Residential use."~~)) Section 23.84A.008.

* * *

((~~"Detached accessory dwelling unit" has the meaning defined in Chapter 23.84A.032's definition of "Residential use".~~))

* * *

Section 4. Section 14.09.010 of the Seattle Municipal Code, last amended by Ordinance 126080, is amended as follows:

14.09.010 Definitions

"Accessory dwelling unit" has the meaning defined in Section ((~~23.84A.032's definition of "Residential use."~~)) 23.84A.008.

* * *

((~~"Detached accessory dwelling unit" has the meaning defined in Section 23.84A.032's definition of "Residential use".~~))

* * *

"Single family dwelling unit" has the meaning as defined in Section 22.204.200.A.

* * *

Section 5. Section 15.32.200 of the Seattle Municipal Code, last amended by Ordinance 126509, is amended as follows:

15.32.200 At-grade communication cabinets

* * *

F. The applicant for a new at-grade communication cabinet proposal that is more than 36 inches in height including footings or bases as measured from the grade of the surrounding public place, or has a maximum volume of more than 18 cubic feet, shall: (1) send notice of a Seattle Department of Transportation application by first-class mail to all business entities, property owners, and residents located within a 100-foot radius from where the communication cabinet is proposed to be located; and (2) post notice of the new application at the proposed site. The notice shall be displayed towards the nearest public place that abuts the site and is viewable by the public and shall be maintained on the site for the duration of the public notice period.

1. If the new at-grade communication cabinet proposal is more than 36 inches in height including footings or bases as measured from the grade of the surrounding public place, or has a maximum volume of more than 18 cubic feet, and is abutting a lot zoned ((~~NR1, NR2, NR3, RSL,~~)) NR, LR1, LR2, or LR3 as these zoning designations are defined under subsection 23.30.010.A and the abutting zoning does not have an RC classification as shown on the Official Land Use Map, Chapter 23.32 ("residentially zoned parcels"), the communication cabinet shall be fully screened from the public place and abutting private property. If it is not feasible to install mitigation screening due to physical site constraints, the applicant shall provide an alternative mitigation proposal within 200 feet of the project. If the alternative mitigation cannot be located within 200 feet of the project, the applicant shall propose an alternative location that the Director shall review and may approve. All mitigation screening shall comply with setback standards in

Section 15.32.250 and remain the permittee's sole responsibility to maintain so long as the communication cabinet or accessory equipment occupies the public place. As determined by the Director, mitigation screening may include landscaping, fencing, or visual treatment to the cabinet surface. Visual treatment to the cabinet may include paint, decals, vinyl wraps, photos, or other surface treatments. A cabinet shall be considered fully screened for visual treatment purposes when the treatment is applied to all communication cabinet vertical surfaces.

2. The applicant shall send and post all required notices at least three calendar days before the start of the public notice period. The mailing and on-site notice shall be on a form provided by the Seattle Department of Transportation and shall include: a description of the proposed location and installations, comment period dates, information on how the public can submit comments to the Seattle Department of Transportation, and how to request a reconsideration of a Street Use permit decision. If the proposal is abutting a residentially zoned parcel, the mailing and on-site notice shall include a visual and narrative description of the proposed mitigation screening required in subsection 15.32.200.F.1.

3. Written comments concerning the application shall be postmarked or emailed to the Director of the Seattle Department of Transportation within ten business days after the first day of the public notice period.

4. The applicant shall provide the Director of the Seattle Department of Transportation with a mailing list containing the individuals the notice was mailed to, the recipient's mailing address, and date the notice was mailed to each recipient.

* * *

Section 6. Section 15.32.250 of the Seattle Municipal Code, last amended by Ordinance 126732, is amended as follows:

15.32.250 Communication cabinet standards and setbacks

* * *

C. If the at-grade communication cabinet is to be installed in a planting strip it shall be placed in proximity to and in line with existing utility or street light poles, street signs, or other existing structures within the planting strip in order to create a physical and visual alignment. The communication cabinet shall not impair the line of sight for vehicles exiting adjacent alleys, streets, or driveways as provided in ((~~subsection 23.54.030.G~~)) Section 23.54.032 or other sight triangle requirements adopted by City code or rule.

* * *

Section 7. Section 21.49.110 of the Seattle Municipal Code, last amended by Ordinance 125171, is amended as follows:

21.49.110 Electric service connection provisions

* * *

E. Prohibition of master metering((~~.~~))

1. The Department shall not supply electricity for any new service to a duplex or multiple-dwelling building for the purpose of master metering the energy usage of the dwelling units, a central space heating system or HVAC system, or a central domestic water heating system. The Department shall not supply electricity for any larger service to an existing duplex or multiple-dwelling building for the purpose of master metering new central or individual space heating or HVAC systems. The existence of alternative laundry or dining arrangements for residents of multiple-dwelling buildings (such as central kitchens and dining rooms where

residents can buy or eat their meals, or a central laundry), in addition to the availability of cooking and/or laundry facilities within the individual dwelling units, will not be considered grounds for an exemption from the prohibition of master metering.

2. This prohibition does not apply to multiple-dwelling buildings such as transitional housing, student dormitories and residences for religious orders, the elderly or the disabled, in which the residents do not live independently.

3. In situations with a mix of living accommodations where some residents live independently and some do not, those buildings or portions of buildings which provide non-transient independent dwelling units will not be eligible for master metering.

4. Accessory housing exception. ((~~An owner occupied dwelling unit also containing an additional "accessory housing unit" meeting all provisions as defined in Chapter 23.44 and approved by the City~~)) A structure that only contains one principal dwelling unit and one accessory dwelling unit shall be exempt from the master metering provisions of this Chapter 21.49.

5. Other exceptions. Exemption from the master metering prohibition for residential dwelling situations not covered in the provisions of this Chapter 21.49 may be granted on a case-by-case basis by the Department.

* * *

Section 8. Section 22.214.020 of the Seattle Municipal Code, last amended by Ordinance 124919, is amended as follows:

22.214.020 Definitions

For purposes of this Chapter 22.214, the following words or phrases have the meaning prescribed below:

"Accessory dwelling unit" or "ADU" ((~~means an "Accessory dwelling unit" or a "Detached accessory dwelling unit" or "DADU" as~~)) has a meaning defined ((~~under "Residential use"~~)) in Section ((~~23.84A.032~~)) 23.84A.008.

* * *

Section 9. Section 22.801.200 of the Seattle Municipal Code, last amended by Ordinance 126509, is amended as follows:

22.801.200 "S"

* * *

"Sidewalk" means "sidewalk" as defined in Section 23.84A.036.

"Sidewalk project" means a project for the creation of a new sidewalk or replacement of an existing sidewalk, including any associated planting strip, apron, curb ramp, curb, or gutter, and necessary roadway grading and repair. If the total new plus replaced hard surface in the roadway exceeds 10,000 square feet, the entire project is a roadway project.

"Single-family residential project" means a project that constructs one ((~~Single-family Dwelling Unit~~)) principal detached or attached dwelling unit as defi

ned in ((~~subsection 23.84A.032~~)) 23.84A.008 and any associated accessory dwelling unit located in land classified as being Neighborhood Residential ((~~1 (NR1), Neighborhood Residential 2 (NR2), or Neighborhood Residential 3 (NR3)~~)) pursuant to Section 23.30.010, and the total new plus replaced hard surface is less than 5,000 square feet.

* * *

Section 10. Section 22.907.030 of the Seattle Municipal Code, last amended by Ordinance 125873, is amended as follows:

22.907.030 Notice of proposed sale of low-income multi-family rental building

A. Except as provided in this Section 22.907.030, an owner of a ((~~multifamily rental housing~~)) building ((~~as defined in Section 23.84A.032,~~)) having two or more housing rental units, excluding congregate residences as defined in Section 23.84A.032, any one of which rents for an amount that is affordable to households at or below 80 percent of area median income, as most recently determined by the United States Department of Housing and Urban Development

for the Seattle metropolitan statistical area, shall notify the Seattle Office of Housing (OH) and the Seattle Housing Authority (SHA) of the owner's intent to sell the building. The notice shall be in writing and include the owner's name, phone number, and the address of the rental housing building that will be offered for sale. At the same time, the owner shall submit to OH a declaration signed under penalty of perjury, affirming that the owner has complied with the notice requirements of this Section 22.907.030. The notice and declaration shall be submitted no later than 90 days prior to the building being listed with any real estate listing service or advertised for sale in a printed newspaper or on a website. For the purposes of this Section 22.907.030, a building is "listed" when an owner has signed a listing agreement with a real estate agent.

* * *

Section 11. Section 23.22.062 of the Seattle Municipal Code, last amended by Ordinance 127211, is amended as follows:

23.22.062 Unit lot subdivisions

A. The provisions of this Section 23.22.062 apply exclusively to the unit subdivision of land for residential development including ((~~single-family dwelling units, townhouse, rowhouse, and cottage housing developments,~~)) attached and detached dwelling units and existing ((~~apartment~~)) structures containing stacked dwelling units built prior to January 1, 2013, but not individual ((~~apartment~~)) stacked dwelling units, in all zones in which these uses are permitted, or any combination of the above types of residential development as permitted in the applicable zones.

* * *

Section 12. Section 23.24.045 of the Seattle Municipal Code, last amended by Ordinance 127211, is amended as follows:

23.24.045 Unit lot subdivisions

A. The provisions of this Section 23.24.045 apply exclusively to the unit subdivision of land for residential development including ((~~single-family dwelling units, townhouse, rowhouse, and cottage housing developments,~~)) attached and detached dwelling units and existing ((~~apartment~~)) structures containing stacked dwelling units built prior to January 1, 2013, but not individual ((~~apartment~~)) stacked dwelling units, in all zones in which these uses are permitted, or any combination of the above types of residential development as permitted in the applicable zones.

* * *

Section 13. Section 23.28.030 of the Seattle Municipal Code, last amended by Ordinance 126157, is amended as follows:

23.28.030 Criteria for approval

A. The Director shall approve an application for a lot boundary adjustment if it is determined that:

1. No additional lot, tract, parcel, site, or division is created by the proposed adjustment;

2. No lot contains insufficient area and dimensions to meet the minimum requirements for development as calculated under the development standards of the zone in which the lots affected are situated((~~, except as provided in Section 23.44.010,~~)) and under any applicable regulations for siting development on parcels with riparian corridors, wetlands, wetland buffers, or steep slopes in Chapter 25.09 or Section 23.60A.156. Adjusted lots shall

continue to be regarded as existing lots for purposes of Chapter 25.09. Any required nondisturbance area shall be legibly shown and described on the site plan, and a covenant shall be required as set out in Section 25.09.335;

3. Every proposed adjusted lot shall conform to the following standards for lot configuration, unless a modification is authorized under subsection 23.28.030.A.4:

a. If an adjusted lot is proposed with street frontage, then one lot line shall abut the street for at least 10 feet; ((~~and~~))

b. No adjusted lot shall be less than 10 feet wide for a distance of more than 10 feet as measured at any point; ((~~and~~))

c. No adjusted lot shall have more than six separate lot lines. The lot lines shall be straight lines unless the irregularly shaped lot line is caused by an existing right-of-way or existing lot line; and

d. If a lot to be adjusted abuts upon an alley, and that alley is either improved or required to be improved according to the standards of Section 23.53.030, then no adjusted lot shall be proposed that does not provide alley access, except that access from a street to an existing use or structure is not required to be changed to alley access. Either the proposed adjusted lots shall have sufficient frontage on the alley to meet access standards for the zone in which the property is located or an access easement from the adjusted lot or lots shall be provided to the alley that meets access standards for the zone in which the property is located.

4. Modification. The standards of subsection 23.28.030.A.3 may be modified if at least one of the following criteria applies:

a. One or more of the existing lots prior to the lot boundary adjustment is irregular in shape;

b. Topography, natural obstructions, configuration of existing lot lines prior to lot line adjustment, existing platting patterns, or street alignment prevent the reconfiguration of one or more lots according to the standards of subsection 23.28.030.A.3;

c. Location of existing principal structures that are retained on lots existing prior to the proposed lot boundary adjustment require a reconfiguration of one or more lots that cannot reasonably meet the standards of subsection 23.28.030.A.3;

d. Location of existing easements or feasibility of access to portions of the property prevents the reconfiguration of lot lines that meet the standards of subsection 23.28.030.A.3; or

e. The lot boundary adjustment establishes an irregular lot line that resulted from an adverse possession claim.

5. No adjusted lot shall be approved for development without a determination that it is capable of being served by existing or extended infrastructure for drainage; a determination that the lot has water supply and sanitary sewage disposal; and a determination that there is access for vehicles, utilities, and fire protection;

6. The lot boundary adjustment is consistent with applicable provisions of this Title 23 including, for lots in the Shoreline District, conformance with the applicable provisions of Section 23.60A.168.

* * *

Section 14. Section 23.30.010 of the Seattle Municipal Code, last amended by Ordinance 126862, is amended as follows:

23.30.010 Classifications for the purpose of this Subtitle III

A. General zoning designations. The zoning classification of land shall include one of the designations in this subsection 23.30.010.A. Only in the case of land designated "RC," the classification shall include both "RC" and one additional multifamily zone designation in this subsection 23.30.010.A.

Zones	**Abbreviated**
Residential, Neighborhood ((~~1~~))	NR((~~1~~))
((~~Residential, Neighborhood 2~~	~~NR2~~
~~Residential, Neighborhood 3~~	~~NR3~~
~~Residential, Neighborhood, Small Lot~~	~~RSL~~))
Residential, Multifamily, Lowrise 1	LR1
Residential, Multifamily, Lowrise 2	LR2
Residential, Multifamily, Lowrise 3	LR3
Residential, Multifamily, Midrise	MR
Residential, Multifamily, Highrise	HR
Residential-Commercial	RC
Neighborhood Commercial 1	NC1
Neighborhood Commercial 2	NC2
Neighborhood Commercial 3	NC3
Master Planned Community—Yesler Terrace	MPC-YT
Seattle Mixed—South Lake Union	((~~SMU-SLU~~)) SM-SLU
Seattle Mixed—Dravus	SM-D

Zones	**Abbreviated**
Seattle Mixed—North Rainier	SM-NR
Seattle Mixed - Rainier Beach	SM-RB
Seattle Mixed—University District	SM-U
Seattle Mixed—Uptown	SM-UP
Seattle Mixed—Northgate	SM-NG
Commercial 1	C1
Commercial 2	C2
Downtown Office Core 1	DOC1
Downtown Office Core 2	DOC2
Downtown Retail Core	DRC
Downtown Mixed Commercial	DMC
Downtown Mixed Residential	DMR
Pioneer Square Mixed	PSM
International District Mixed	IDM
International District Residential	IDR
Downtown Harborfront 1	DH1
Downtown Harborfront 2	DH2
Pike Market Mixed	PMM
General Industrial 1	IG1
General Industrial 2	IG2
Industrial Buffer	IB

Zones	Abbreviated
Industrial Commercial	IC
Maritime Manufacturing and Logistics	MML
Industry and Innovation	II
Urban Industrial	UI

* * *

Section 15. Section 23.34.010 of the Seattle Municipal Code, last amended by Ordinance 126509, is repealed:

((~~**23.34.010 Designation of NR1, NR2, and NR3 zones**~~

~~A. Except as provided in subsection 23.34.010.B, areas zoned NR1, NR2, or NR3 may be rezoned to zones more intense than NR3 only if the City Council determines that the area does not meet the locational criteria for NR1, NR2, or NR3 zones.~~

~~B. Areas zoned NR1, NR2, or NR3 that meet the locational criteria contained in subsections 23.34.011.B.1 through 23.34.011.B.3 may only be rezoned to zones more intense than NR3 if they are located within the adopted boundaries of an urban village, and the rezone is to a zone that is subject to the provisions of Chapter 23.58B and Chapter 23.58C.~~))

Section 16. Section 23.34.011 of the Seattle Municipal Code, last amended by Ordinance 126509, is amended as follows:

23.34.011 ((~~NR1, NR2, and NR3 zones~~)) <u>NR zone</u>, function((~~,~~)) and locational criteria

A. Function. An area that provides ((~~predominantly detached single-family structures on lot sizes compatible with the existing pattern of development and the character of neighborhood residential areas~~)) <u>for the development of detached, attached, and stacked dwelling units within a predominately three-story height limit</u>.

B. Locational criteria. An ((~~NR1, NR2, or NR3~~)) NR zone designation is most appropriate in areas that are ((~~outside of urban centers and villages and meet the following criteria~~)) generally characterized by the following conditions:

((~~1. Areas that consist of blocks with at least 70 percent of the existing structures, not including detached accessory dwelling units, in single-family residential use; or~~

~~2. Areas that are designated by an adopted neighborhood plan as appropriate for single-family residential use; or~~

~~3. Areas that consist of blocks with less than 70 percent of the existing structures, not including detached accessory dwelling units, in single-family residential use but in which an increasing trend toward single-family residential use can be demonstrated; for example:~~

~~a. The construction of single-family structures, not including detached accessory dwelling units, in the last five years has been increasing proportionately to the total number of constructions for new uses in the area, or~~

~~b. The area shows an increasing number of improvements and rehabilitation efforts to single-family structures, not including detached accessory dwelling units, or~~

~~c. The number of existing single-family structures, not including detached accessory dwelling units, has been very stable or increasing in the last five years, or~~

~~d. The area's location is topographically and environmentally suitable for single-family residential developments.~~))

1. The area is located outside of an urban center, urban village, or Station Area Overlay District;

2. The area is characterized by residential structures of generally three stories or less; and

3. One or more of the following conditions are present:

a. The area is not located near a major transit stop or on streets abutting frequent transit routes where higher density development might be more appropriate;

b. A significant portion of the area contains environmentally critical areas; or

c. The area is characterized by limited local access and circulation that make the area less suitable for higher density development.

((~~C. An area that meets at least one of the locational criteria in subsection 23.34.011.B should also satisfy the following size criteria in order to be designated as a NR1, NR2, or NR3 zone:~~

~~1. The area proposed for rezone should comprise 15 contiguous acres or more, or should abut existing NR1, NR2, or NR3 zones.~~

~~2. If the area proposed for rezone contains less than 15 contiguous acres, and does not abut existing NR1, NR2, or NR3 zones, then it should demonstrate strong or stable single-family residential use trends or potentials such as:~~

~~a. That the construction of single-family structures, not including detached accessory dwelling units, in the last five years has been increasing proportionately to the total number of constructions for new uses in the area, or~~

~~b. That the number of existing single-family structures, not including detached accessory dwelling units, has been very stable or increasing in the last five years, or~~

~~c. That the area's location is topographically and environmentally suitable for single-family structures, or~~

~~d. That the area shows an increasing number of improvements or rehabilitation efforts to single-family structures, not including detached accessory dwelling units.~~

~~D. Half-blocks at the edges of NR1, NR2, or NR3 zones which have more than 50 percent single-family structures, not including detached accessory dwelling units, or portions of blocks on an arterial which have a majority of single-family structures, not including detached accessory dwelling units, shall generally be included. This shall be decided on a case-by-case basis, but the policy is to favor including them.~~))

Section 17. Section 23.34.012 of the Seattle Municipal Code, last amended by Ordinance 126855, is repealed:

((~~**23.34.012 Neighborhood Residential Small Lot (RSL) zone, function, and locational criteria**~~

~~A. Function. An area within an urban village that provides for the development of homes on small lots that may be more affordable compared to detached homes on larger lots and appropriate for households with children.~~

~~B. Locational criteria. An RSL zone is most appropriate in areas generally characterized by the following:~~

~~1. The area is similar in character to neighborhood residential zones;~~

~~2. The area is located inside an urban center, urban village, or Station Area Overlay District where it would provide opportunities for a diversity of housing types within these denser environments;~~

~~3. The area is characterized by, or appropriate for, a mix of single-family dwelling units, multifamily structures that are similar in scale to single-family dwelling units, such as duplex, triplex, rowhouse, and townhouse developments, and single-family dwelling units that have been converted to multifamily residential use or are well-suited to conversion;~~

~~4. The area is characterized by local access and circulation that can accommodate low density development oriented to the ground level and the street, and/or by narrow roadways, lack of alleys, and/or irregular street patterns that make local access and circulation less suitable for higher density multifamily development;~~

~~5. The area is within a reasonable distance of frequency transit service, but is not close enough to make higher density multifamily development more appropriate.~~

~~6. The area would provide a gradual transition between neighborhood residential zoned areas and multifamily or neighborhood commercial zoned areas; and~~

~~7. The area is supported by existing or projected facilities and services used by residents, including retail sales and services, parks, and community centers.~~))

Section 18. Section 23.34.013 of the Seattle Municipal Code, last amended by Ordinance 126509, is repealed:

((~~**23.34.013 Designation of multifamily zones**~~

~~An area zoned neighborhood residential that meets the criteria of Section 23.34.011 for designation as NR1, NR2 or NR3 may not be rezoned to multifamily except as otherwise provided in Section 23.34.010.B.~~))

Section 19. Section 23.34.014 of the Seattle Municipal Code, last amended by Ordinance 126509, is amended as follows:

23.34.014 Lowrise 1 (LR1) zone, function and locational criteria

A. Function. The function of the LR1 zone is to provide opportunities ((~~for low-density multifamily housing, primarily rowhouse and townhouse developments, through infill development that is compatible with single-family dwelling units, or through the conversion of existing single-family dwelling units to duplexes or triplexes~~)) for the development of detached, attached, and stacked dwelling units within a predominately three-story height limit at a higher intensity than Neighborhood Residential zones.

B. Locational ((~~Criteria~~)) criteria. The LR1 zone is most appropriate in areas generally characterized by the following conditions:

1. ((~~The area is similar in character to neighborhood residential zones;~~

~~2.~~)) The area is ((~~either~~)):

a. ((~~located~~)) Located outside of an urban center, urban village, or Station Area Overlay District;

b. ((~~a~~)) A limited area within an urban center, urban village, or Station Area Overlay District that would provide opportunities for a diversity of housing types within these denser environments; or

c. ((~~located~~)) Located on a collector or minor arterial;

((~~3.~~)) 2. The area is characterized by ((~~a mix of single-family dwelling units, multifamily structures that are similar in scale to single-family dwelling units, such as rowhouse and townhouse developments, and single-family dwelling units that have been converted to multifamily residential use or are well-suited to conversion~~)) residential structures of generally three stories or less;

((~~4.~~)) 3. The area is characterized by local access and circulation that can accommodate low density ((~~multifamily~~)) development ((~~oriented to the ground level~~)) and the

street, and/or by narrow roadways, lack of alleys, and/or irregular street patterns that make local access and circulation less suitable for higher density ((~~multifamily~~)) development;

((~~5. The area would provide a gradual transition between neighborhood residential zoned areas and multifamily or neighborhood commercial zoned areas; and~~

~~6.~~)) 4. The area is supported by existing or projected facilities and services used by residents, including retail sales and services, parks, and community centers.

Section 20. Section 23.34.072 of the Seattle Municipal Code, last amended by Ordinance 126509, is repealed:

((~~23.34.072 Designation of commercial zones.~~

~~A. The encroachment of commercial development into residential areas shall be discouraged.~~

~~B. Areas meeting the locational criteria for a neighborhood residential designation may be designated as certain neighborhood commercial zones as provided in Section 23.34.010.~~

~~C. Preferred configuration of commercial zones shall not conflict with the preferred configuration and edge protection of residential zones as established in Sections 23.34.010 and 23.34.011 of the Seattle Municipal Code.~~

~~D. Compact, concentrated commercial areas, or nodes, shall be preferred to diffuse, sprawling commercial areas.~~

~~E. The preservation and improvement of existing commercial areas shall be preferred to the creation of new business districts.~~))

Section 21. Section 23.42.022 of the Seattle Municipal Code, enacted by Ordinance 127211, is amended as follows:

23.42.022 Accessory dwelling units

A. ((~~Attached and detached accessory~~)) Accessory dwelling units are ((~~permitted~~)) allowed as a housing use in all zones where ((~~single-family dwelling units are permitted~~)) housing uses are allowed. In the Shoreline District, accessory dwelling units shall comply with Chapter 23.60A.

((~~B. A maximum of two accessory dwelling units may be located on the same lot as a principal dwelling unit. Either or both accessory dwelling units may be attached or detached. Two detached accessory dwelling units may be located in one structure.~~))

B. Accessory dwelling units may not be accessory to residential uses other than housing uses.

C. No lot may have more than two accessory dwelling units.

D. Accessory dwelling units may be attached, detached, or stacked.

E. Unless otherwise provided in the standards of the underlying zone, accessory dwelling units shall be subject to the same standards as principal dwelling units.

F. Accessory dwelling units must be located on the same lot as the principal dwelling unit.

((~~C. Floor area limit in all zones and floor area ratio in Neighborhood Residential zones~~)) G. Maximum size

1. The gross floor area of an accessory dwelling unit may not exceed 1,000 square feet.

2. The following are not included in the gross floor area limit:

a. Up to 250 square feet of gross floor area in an attached garage;

b. ((~~Exterior-only accessed storage areas;~~

~~c.~~)) All stories, or portions of stories, that are underground; and

((~~d.~~)) c. Up to 35 square feet of gross floor area dedicated to long-term bicycle parking.

((~~3. In NR1, NR2, and NR3 zones, gross floor area in an accessory dwelling unit is exempt from FAR limits.~~

~~D. Permitted height~~

~~1. Neighborhood Residential zones. The maximum permitted height for accessory dwelling units is the permitted height for a principal dwelling unit.~~

~~2. Lowrise zones. The maximum permitted height for accessory dwelling units is the permitted height for rowhouse and townhouse development in the applicable zone.~~

~~3. All zones other than Neighborhood Residential or Lowrise. For zones with height limits of 40 feet or less, accessory dwelling units are subject to the permitted height of the zone for principal dwelling units. For zones with height limits greater than 40 feet, accessory dwelling units are subject to the permitted height for rowhouse and townhouse development in the LR3 zone, whichever height limit is applicable.~~

~~4. In all zones, accessory dwelling units associated with cottage developments are subject to the permitted height for cottage housing developments for the applicable zone.~~

~~5. In all zones, allowances above the maximum height limit for pitched roofs, including shed and butterfly roofs, and exemptions for rooftop features are permitted per the applicable zone.~~

~~E. In all zones, accessory dwelling units and appurtenant architectural elements including architectural details, bay windows, and other projections, such as covered porches, patios, decks, and steps, are subject to the yard and setback provisions for principal dwelling units in the underlying zone, except as follows:~~

~~1. In all zones detached accessory dwelling units have no required setback from any lot line that abuts an alley.~~

~~2. Neighborhood Residential zones~~

~~a. A detached accessory dwelling unit and appurtenant architectural elements may be located in the rear yard so long as the structure is no closer than 5 feet to any lot line that does not abut an alley. When a detached accessory dwelling unit is located within a rear yard, the following features may also be located within 5 feet of any lot line:~~

~~1) External architectural details with no living area, such as chimneys, eaves, cornices, and columns, may be located no closer than 3 feet from a property line.~~

~~2) Bay windows no more than 8 feet in width may be located no closer than 3 feet from a property line.~~

~~3) Other projections that include interior space, such as garden windows, may be located no closer than 3.5 feet from a property line starting a minimum of 30 inches above furnished floor, and with maximum dimensions of 6 feet in height and 8 feet in width.~~

~~b. On a through lot, when yards or setbacks cannot be determined, the Director shall designate a rear yard or rear setback for the purpose of allowing an accessory dwelling. In designating a rear yard or rear setback, the Director shall consider factors including but not limited to the location of the yards and setbacks for adjacent structures on the same block face, vehicular and pedestrian access, platting patterns in the vicinity, and topography.~~

~~3. Lowrise zones. Detached accessory dwelling units are excluded from setback averaging provisions and are subject to the minimum setback provision for a principal dwelling unit.~~

~~F. Rooftop decks that are portions of an accessory dwelling unit are allowed up to the applicable height limit, including additions allowed to a detached accessory dwelling unit under subsection 23.44.014.C.4.~~

~~G.~~)) H. Conversions of existing structures

1. For purposes of this subsection ((~~23.42.022.G~~)) 23.42.022.H, the term "conversion" means keeping an existing structure intact, adding to or altering an existing structure, or removing and rebuilding an existing structure, provided that any expansion or relocation of the structure complies with the development standards for accessory dwelling units in this Section 23.42.022 and the provisions of the applicable zone, unless otherwise allowed by this subsection ((~~23.42.022.G~~)) 23.42.022.H.

2. For the purposes of this subsection ((~~23.42.022.G~~)) 23.42.022.H, the term "existing accessory structure" means an accessory structure existing prior to July 23, 2023 or an accessory structure existing prior to July 23, 2023 that was subsequently replaced to the same configuration.

3. Existing accessory structures. An existing accessory structure may be converted into a detached accessory dwelling unit if it meets the following:

a. To facilitate the conversion of and additions to an existing accessory structure, the Director may allow waivers and modifications as a Type I decision to the provisions for accessory dwelling units in this Section 23.42.022 and the development standards of the applicable zone.

b. Conversion of an existing accessory structure to a detached accessory dwelling unit is permitted notwithstanding applicable lot coverage or yard or setback provisions in this Section 23.42.022 or the applicable zone. The converted accessory structure shall comply with the minimum standards set forth in Sections 22.206.020 through 22.206.140.

4. Existing principal structures. The gross floor area of an attached accessory dwelling unit may exceed 1,000 square feet if the portion of the structure in which the attached accessory dwelling unit is located existed as of July 23, 2023.

((~~H. Building separation~~

~~1. Neighborhood Residential zones. A detached accessory dwelling unit shall be separated from its principal dwelling unit by a minimum of 5 feet measured from eave to eave. To be considered attached, an accessory dwelling unit must be connected to the principal dwelling unit by an enclosed space that is at least 3 feet wide, 3 feet tall, and 3 feet long.~~

~~2. All other zones. A detached accessory dwelling unit shall be separated from its principal dwelling unit by a minimum of 3 feet measured from eave to eave. To be considered attached, an accessory dwelling unit must be connected to a principal dwelling unit by an enclosed space that is at least 3 feet wide, 3 feet tall, and 3 feet long.~~))

I. No off-street motor vehicle parking is required for an accessory dwelling unit.

J. When calculating density, the number of dwelling units shall include both accessory dwelling units and principal dwelling units.

((~~J.~~)) K. Title 23 shall not be interpreted or applied to prohibit the sale or other conveyance of a condominium unit on the grounds that the condominium unit was originally built as an accessory dwelling unit.

((~~K.~~)) L. Unless provided otherwise in this Section 23.42.022, the provisions of the applicable zone and overlay district apply. In the event of conflict with provisions elsewhere in Title 23 other than Chapter 23.60A, this Section 23.42.022 shall prevail.

Section 22. A new Section 23.42.024 is added to the Seattle Municipal Code as follows:

23.42.024 Adult family homes

Adult family homes are allowed as a home occupation in all zones where housing uses are allowed.

Section 23. Section 23.42.050 of the Seattle Municipal Code, last amended by Ordinance 126845, is amended as follows:

23.42.050 Home occupations

A home occupation of a person residing in a dwelling unit is permitted outright in all zones as an accessory use to any residential use permitted outright or to a permitted residential conditional use, subject to the following requirements:

* * *

G. A maximum of three passenger vehicles, vans, and similar vehicles, associated with the home occupation, each not exceeding a gross vehicle weight of 10,000 pounds are permitted to be at the home occupation site, independent of commercial deliveries and pickups. For lots developed with a ((~~single-family~~)) residential dwelling unit in NR zones, this limit is in addition to the outdoor parking limit in subsection ((~~23.44.016.C.3~~)) 23.44.160.E.

* * *

Section 24. Section 23.42.106 of the Seattle Municipal Code, last amended by Ordinance 126685, is amended as follows:

23.42.106 Expansion of nonconforming uses

* * *

B. In addition to the standards in subsection 23.42.106.A, a structure in a ((~~neighborhood residential~~)) Neighborhood Residential zone occupied by a nonconforming residential use may be allowed to expand subject to the following:

1. The number of dwelling units shall not be increased, except as may be allowed pursuant to Section 23.40.040.

2. For a nonconforming residential use that is not a multifamily use, except as may be allowed pursuant to Section 23.40.040; if originally permitted by conditional use, the number shall not be allowed to increase above the number permitted by the conditional use approval.

3. An expansion of no more than 500 square feet of gross floor area, meeting the development standards for ((~~single-family~~)) residential construction in Chapter 23.44 and not exceeding the average height of the closest principal structures on either side, is allowed.

4. An expansion greater than 500 square feet of gross floor area and/or exceeding the average height of the closest principal structures on either side may be approved by the Seattle Department of Construction and Inspections through a special exception Type II Master Use Permit, if the proposed expansion meets the development standards for ((~~single-family~~)) residential construction and is compatible with surrounding development in terms of:

a. Architectural character;

b. Existing streetscape and pattern of ((~~yards~~)) setbacks; and

c. Scale and proportion of principal structures.

5. If an addition proposed under subsection 23.42.106.B.3 or 23.42.106.B.4 would require additional parking under the requirements of Section 23.54.015 ((~~for multifamily structures~~)), that additional parking must be provided.

* * *

D. A nonconforming nonresidential use shall not be expanded or extended, except as follows:

1. A structure occupied by a nonconforming nonresidential use may be maintained, repaired, renovated, or structurally altered but shall not be expanded or extended except as otherwise required by law, as necessary to improve access for the elderly or disabled or as specifically permitted elsewhere in this Code.

2. In ((~~the~~)) Seattle Mixed zones, general manufacturing uses exceeding 25,000 square feet of gross floor area and heavy manufacturing uses may be expanded or extended by an amount of gross floor area not to exceed 20 percent of the existing gross floor area of the use, provided that this exception may be applied only once to any individual business establishment.

3. The Seattle Asian Art Museum building and use located in Volunteer Park, as it exists on January 1, 2017, may be expanded subject to the following development standards:

a. Except as provided in this subsection 23.42.106.D.3, the development standards of Chapter 23.44 do not apply.

b. The building may be expanded one or more times but the gross floor area of all expansions combined and occurring after January 1, 2017, may not exceed 15,000 square feet.

c. No expansion may be located in a freestanding building that lacks a common wall with the building either as it existed on January 1, 2017, or as subsequently expanded.

d. No expansion may exceed the elevation of the highest point of the building as it existed on January 1, 2017.

e. Parking and loading for the proposed expansion is required as provided in Sections 23.54.015 and 23.54.035. As a Type I decision, the Director may reduce parking and loading requirements to an amount not less than the amount needed to provide adequate parking and loading facilities, as demonstrated to the satisfaction of the Director by a parking and loading study prepared by a licensed professional engineer and submitted to the Director by the applicant.

f. Bicycle parking for the proposed expansion shall be provided in accordance with ((~~subsection 23.54.015.K~~)) Section 23.54.037.

g. The street and sidewalk requirements of Chapter 23.53 do not apply.

h. Exterior lighting shall be shielded or directed away from adjacent residentially zoned lots.

i. Nothing in this Section 23.42.106 alters the authority of the Landmarks Preservation Board pursuant to the City's Landmarks Preservation Ordinance.

* * *

Section 25. Section 23.42.110 of the Seattle Municipal Code, last amended by Ordinance 126509, is amended as follows:

23.42.110 Change from one nonconforming use to another nonconforming use

A nonconforming use may be converted by an administrative conditional use authorization to another use not otherwise permitted in the zone subject to the following limitations and conditions.

A. ((~~In neighborhood residential and residential small lot zones, a nonconforming multifamily residential use may not be converted to any nonresidential use not otherwise permitted in the zone.~~

~~B.~~)) The proposed new use must be no more detrimental to properties in the zone and vicinity than the existing use. This determination shall be based on consideration of the following factors:

1. The zones in which both the existing use and the proposed new use are allowed;

2. The number of employees and clients associated or expected with the proposed use;

3. The relative parking, traffic, light, glare, noise, odor and similar impacts of the two uses and how these impacts could be mitigated.

((~~C~~)) B. The existence of a single residential unit, such as a caretaker's or proprietor's unit, accessory to a nonconforming commercial use shall not be treated as having established a

residential use, and such a unit may be converted or changed provided that it is the only residential use in the structure and comprises less than half of the total floor area of the structure.

((~~D~~)) C. Parking requirements for the proposed use shall be determined by the Director.

((~~E~~)) D. If the new use is permitted, the Director may require mitigation measures, including but not limited to landscaping, sound barriers or fences, mounding or berming, adjustments to ((~~yards~~)) setback or parking standards, design modification, or limiting hours of operation.

Section 26. Section 23.42.124 of the Seattle Municipal Code, last amended by Ordinance 126509, is amended as follows:

23.42.124 Light and glare standards nonconformity

When nonconforming exterior lighting is replaced, new lighting shall conform to the requirements of the light and glare standards of the respective zone. See ((~~subsection 23.44.008.H~~)) Section 23.44.150 for ((~~neighborhood residential~~)) Neighborhood Residential zones; Section 23.45.534 for multifamily zones; Section 23.46.020 for residential-commercial zones; Section 23.47A.022 for C zones or NC zones; Section 23.48.075 for SM zones; Section 23.49.025 for downtown zones; and Section 23.50.046 for IB and IC zones.

Section 27. Section 23.42.130 of the Seattle Municipal Code, last amended by Ordinance 127099, is repealed:

((~~**23.42.130 Nonconforming solar collectors**~~

~~The installation of solar collectors that do not conform to development standards or that increase an existing nonconformity may be permitted as follows:~~

~~A. In neighborhood residential zones, pursuant to subsection 23.44.046.B;~~

~~B. In multifamily zones, pursuant to subsection 23.45.545.E;~~

~~C. In NC zones or C zones, pursuant to subsection 23.47A.012.E.~~))

Section 28. A new Section 23.42.132 is added to the Seattle Municipal Code as follows:

23.42.132 Columbariums, garden wall crypts, and mausoleums

Columbariums, garden wall crypts, and mausoleums are permitted only as accessory to existing cemeteries, except that columbariums and garden wall crypts may also be accessory to religious facilities. In addition, no interment openings shall abut or be directly across the street from property other than cemetery property. For columbariums, garden wall crypts, and mausoleums accessory to existing cemeteries, any border between structures and the property line shall be landscaped and maintained by the owner in good condition.

Section 29. Chapter 23.44 of the Seattle Municipal Code, last amended by Ordinance 127099, is repealed as shown in Attachment 2 to this ordinance.

Section 30. A new Chapter 23.44 is added to the Seattle Municipal Code as follows:

Chapter 23.44 NEIGHBORHOOD RESIDENTIAL

23.44.010 Scope of provisions

A. This Chapter 23.44 establishes regulations for the Neighborhood Residential (NR) zone.

B. Some land in these zones may be regulated by Subtitle III, Division 3, Overlay Districts, of this Title 23 in addition to the standards of this Chapter 23.44.

C. Other regulations may apply to development proposals, including but not limited to general use provisions (Chapter 23.42); transportation concurrency and transportation impact mitigation (Chapter 23.52); requirements for streets, alleys, and easements (Chapter 23.53); standards for access, off-street parking, and solid waste storage (Chapter 23.54); sign

regulations (Chapter 23.55); communication regulations (Chapter 23.57); shoreline regulations (Chapter 23.60A); and environmental protection and historic preservation (Title 25).

D. Congregate residences are subject to additional requirements as specified in Section 23.42.049.

23.44.020 Permitted and prohibited uses

A. All uses are permitted outright, prohibited, or permitted as a conditional use according to Table A for 23.44.020 and this Section 23.44.020. Uses not referred to in Table A for 23.44.020 are prohibited, unless otherwise indicated in this Chapter 23.44 or Chapters 23.51A, 23.51B, or 23.57. Communication utilities and accessory communication devices, except as exempted in Section 23.57.002, are subject to this Chapter 23.44 and Chapter 23.57. Public facilities are subject to Section 23.51A.004.

B. All permitted uses are allowed as a principal use or as an accessory use, unless otherwise indicated in this Chapter 23.44.

Table A for 23.44.020
Permitted and prohibited uses

Uses	**Permitted and prohibited uses**
A. Residential uses except as listed below	P
A.1. Assisted living facilities	X
A.2. Caretaker's quarters	X
A.3. Congregate residences	X/P[1]
B. Institutions except as listed below	P/CU[2]
B.1. Adult care centers	X

Table A for 23.44.020 Permitted and prohibited uses	
Uses	**Permitted and prohibited uses**
B.2. Colleges	X
B.3. Hospitals	X
B.4. Institutes for advanced study	X
B.5. Museums	X
B.6. Private clubs	X/CU/P[3]
B.7. Vocational or fine arts schools	X
C. Uses in existing or former public schools	
C.1. Preschools, public or private schools, colleges, and community centers in existing or former public schools	P
C.2. Uses not otherwise permitted in existing or former public schools	P[4]
D. Parks and open space uses	P
E. Ground-floor commercial uses	P[5]
F. Human service uses	X
G. Cemeteries	P/X[6]
H. Community gardens	P
I. Rail transit facilities and railroads	P
J. Park and ride facilities	CU[7]
K. Commercially operating horse farms in existence before July 1, 2000	P[8]

Table A for 23.44.020
Permitted and prohibited uses

Uses	Permitted and prohibited uses
L. Uses not otherwise permitted if located in Landmark structures	CU[9]
M. Uses not otherwise permitted if located in structures unsuited to permitted uses	CU[10]
N. All other uses	X

Key to Table A for 23.44.020
P = Permitted outright
CU = Permitted as an administrative conditional use
X = Prohibited
Footnotes to Table A for 23.44.020
[1] Congregate residences are allowed within a major transit service area and prohibited in other areas.
[2] Institutions meeting development standards including but not limited to Section 23.44.180 are permitted outright. Public schools that do not meet development standards are regulated by Chapter 23.51B and Chapter 23.79. Institutions other than public schools that do not meet development standards may be permitted as administrative conditional uses pursuant to Section 23.44.030.
[3] New private clubs are prohibited. Existing private clubs are permitted provided that the use is not expanded. Existing private clubs may be expanded as a conditional use only if the expansion would not result in the gross floor area or the number of surface parking spaces exceeding the amount existing on the effective date of this ordinance by more than 25%.
[4] Pursuant to procedures in Chapter 23.78.
[5] Ground-floor commercial uses are only allowed if they meet the standards of subsection 23.44.020.E.
[6] Pursuant to subsection 23.44.020.D
[7] Pursuant to subsection 23.44.030.F.
[8] Provided that they are located on lots greater than 10 acres and conform to the limits on the number and location of farm animals and structures containing them set forth in Section 23.42.052.
[9] Pursuant to subsection 23.44.030.D.
[10] Pursuant to subsection 23.44.030.E.

C. Accessory uses

1. Except as otherwise provided in this subsection 23.44.020.C, accessory uses customarily incidental to principal uses permitted outright are permitted outright.

2. All accessory uses and structures, except for urban farms and structures in urban farm use, must be located on the same lot as the principal use or structure unless otherwise specifically provided.

3. Urban farms with planting area not more than 4,000 square feet are permitted outright as an accessory use. Urban farms with more than 4,000 square feet of planting area may be permitted as an administrative conditional use accessory to any principal use permitted outright or as a conditional use, pursuant to Section 23.42.051.

4. Piers and floats are permitted, provided they comply with Chapter 23.60A.

5. Bed and breakfast uses are permitted outright if:

a. The bed and breakfast use has a valid business license tax certificate issued by the Department of Finance and Administrative Services;

b. The bed and breakfast use is operated by the primary resident of the dwelling unit where the bed and breakfast is located or the resident operator;

c. There is no evidence of the bed and breakfast use visible from the exterior of the dwelling unit except for a sign permitted by subsection 23.55.020.D.1; and

d. The bed and breakfast use has no more than five guest rooms, provided that this limitation does not apply to bed and breakfast uses that were established on or before April 1, 1987.

6. Accessory dwelling units are permitted, provided they comply with Section 23.42.022.

7. Human service uses accessory to institutional uses are permitted outright.

D. Existing cemeteries are permitted and are prohibited from expanding. New cemeteries are prohibited. For purposes of this Section 23.44.020, a change in a cemetery boundary is not considered an expansion in size and is permitted provided that:

1. The change does not increase the net land area occupied by the cemetery;

2. The land being added to the cemetery is contiguous to the existing cemetery and is not separated from the existing cemetery by a public street or alley whether or not improved; and

3. The use of the land being added to the cemetery will not result in the loss of housing.

E. All ground-floor commercial uses permitted pursuant to this Section 23.44.020 shall meet the following conditions:

1. The commercial use is located on a corner lot or on a lot that abuts both a street and an alley;

2. The commercial use is limited to the following:

a. Food processing and craft work;

b. General sales and services; and

c. Restaurants;

3. The gross floor area of commercial uses does not occupy more than 2,500 square feet of gross floor area;

4. The commercial use is located only on or below the ground floor of a structure;

5. Vents for venting of odors, vapors, smoke, gas and fumes, and exterior heat exchangers and other similar devices (e.g., related to ventilation, air conditioning,

refrigeration) shall be at least 10 feet above finished sidewalk grade and directed away to the extent possible from residential uses within 50 feet of the vent;

6. Drive-in businesses are prohibited as a principal or accessory use;

7. Outdoor sales of food or beverages must be located at least 50 feet from adjacent lots;

8. Outdoor service of food or beverages must be located at least 50 feet from adjacent lots; and

9. Businesses may not be open between the hours of 10 p.m. and 6 a.m.

23.44.030 Administrative conditional uses

A. Uses permitted as administrative conditional uses in Section 23.44.020 may be permitted by the Director when the provisions of Section 23.42.042 and this Section 23.44.030 are met.

B. Unless otherwise specified in this Chapter 23.44, conditional uses shall meet the development standards for uses permitted outright. If an existing structure is nonconforming to development standards, no conditional use is required for any alterations that do not increase the nonconformity.

C. Institutions other than public schools that do not meet the development standards of this Chapter 23.44, including Major Institution uses as provided in Chapter 23.69, and the expansion of existing private clubs may be permitted subject to the following:

1. Bulk and siting. In order to accommodate the special needs of the proposed institution, and to better site the facility with respect to its surroundings, the Director may modify the applicable development standards. In determining whether to allow such

modifications, the Director shall balance the needs of the institution against the compatibility of the proposed institution with the residential scale and character of the surrounding area.

2. Noise, Light and Glare. The Director may condition the permit in order to mitigate potential noise, light and glare impacts. Measures the Director may require for this purpose include, but are not limited to the following: visual screening, landscaping, sound barriers, fences, berms, adjustments to setbacks or the location of refuse storage areas, location of parking areas and access, structural design modifications, limiting exterior lighting fixture type, location and height to mitigate light trespass, and regulating hours of use.

3. Transportation plan. A transportation plan is required for proposed new institutions and for those institutions proposing to expand larger than 4,000 square feet of gross floor area and/or to provide 20 or more new parking spaces. The Director may condition a permit to mitigate potential traffic and parking impacts pursuant to a Transportation Management Plan or Program as described in Director's rules governing such plans or programs. The Director will determine the level of detail to be disclosed in the transportation plan based on the probable impacts and/or scale of the proposed institution.

D. A use not otherwise permitted in a Neighborhood Residential zone within a structure designated as a Seattle Landmark that is subject to controls and incentives imposed by a designating ordinance, when the owner of the Landmark has executed and recorded an agreement acceptable in form and content to the Landmarks Preservation Board providing for the restoration and maintenance of the historically significant features of the structure, may be permitted subject to the following:

1. The use is compatible with the existing design and/or construction of the structure without significant alteration;

2. Uses permitted by the zone are impractical because of structure design and/or that no permitted use can provide adequate financial support necessary to sustain the structure in reasonably good physical condition; and

3. The use shall not be detrimental to other properties in the zone or vicinity or to the public interest.

E. Uses in structures unsuited to uses permitted outright

1. A use not otherwise permitted in a Neighborhood Residential zone may be permitted as an administrative conditional use in structures unsuited to uses permitted outright in Neighborhood Residential zones. The determination that a use may be permitted shall be based on the following factors:

a. The design of the structure is not suitable for conversion to a use permitted outright in a Neighborhood Residential zone;

b. The structure contains more than 4,000 square feet; and

c. The proposed use will provide a public benefit.

2. Parking requirements for uses permitted under this subsection 23.44.030.E shall be determined by the Director.

3. The Director may require measures to mitigate impacts such as noise, odor, parking, or traffic impacts. Mitigating measures may include but are not limited to landscaping, sound barriers, fences, mounding or berming, adjustments to development standards, design modifications, or setting hours of operation.

4. In the case of an existing or former public school, permissible uses other than those permitted outright in the zone and their development standards including parking

requirements shall be established only pursuant to procedures for establishing criteria for joint use or reuse of public schools in Chapter 23.78.

F. A park and ride facility under the management of a public agency responsible for commuter pooling efforts may be permitted if the Director determines that:

1. It is to be located on an existing parking lot;

2. That parking proposed for the park and ride facility is not needed by the principal use or its accessory uses during the hours proposed for park and ride use; and

3. The park and ride use shall not interfere or conflict with the peak-hour activities associated with the principal use and its accessory uses. The Director may control the number and location of parking spaces to be used.

G. Any use that was previously authorized by a conditional use permit but which has been discontinued shall not be re-established or re-commenced except pursuant to a new conditional use permit, provided that such permit is required for the use at the time re-establishment or re-commencement is proposed. Vacant property, except for dead storage of materials or equipment of the conditional use, shall not be considered as being devoted to the authorized conditional use. The expiration of licenses necessary for the conditional use shall be evidence that the property is not being devoted to the conditional use. A conditional use in a residential structure or a multitenant commercial structure shall not be considered as discontinued unless all units are either vacant or devoted to another use. The following shall constitute conclusive evidence that the conditional use has been discontinued:

1. A permit to change the use of the property has been issued and the new use has been established; or

2. The property has not been devoted to the authorized conditional use for more than 24 consecutive months.

H. Minor structural work that does not increase usable gross floor area or seating capacity and that does not exceed the development standards applicable to the use shall not be considered an expansion and does not require approval as a conditional use unless the work would exceed the height limit of the zone for uses permitted outright. Such work includes but is not limited to roof repair or replacement and construction of uncovered decks and porches, facilities for barrier-free access, bay windows, dormers, and eaves.

23.44.040 General provisions

A. An exception from one specific standard does not relieve the applicant from compliance with any other standard.

B. Any structure occupied by a permitted principal use other than residential use may be converted to residential use even if the structure does not conform to the development standards for residential uses in the Neighborhood Residential zone.

C. Assisted living facilities, congregate residences, and structures containing ground floor commercial uses shall meet the development standards for stacked dwelling units unless otherwise specified.

D. If more than one category of residential use is located on a lot, and if different development standards apply to the different categories of use, then each category's percentage of the total limit imposed by the development standard shall be calculated based on each category's percentage of total structure footprint area as follows:

1. Calculate the footprint, in square feet, for each category of residential use. For purposes of this calculation, "footprint" is defined as the horizontal area enclosed by the exterior walls of the structure.

2. Calculate the total square feet of the footprint of all categories of residential uses on the lot.

3. Divide the square footage of the footprint for each category of residential structure in subsection 23.44.040.D.1 by the total square feet of the footprint of all residential uses in subsection 23.44.040.D.2.

4. Multiply the percentage calculated in subsection 23.44.040.D.3 for each housing category by the area of the lot. The result is the area of the lot devoted to each housing category.

5. The total limit for each category of residential use is the applicable limit for that use multiplied by the percentage calculated in subsection 23.44.040.D.4.

23.44.050 Floor area

A. Gross floor area. In Neighborhood Residential zones, gross floor area includes exterior corridors, breezeways, and stairways that provide building circulation and access to dwelling units or sleeping rooms. Balconies, patios, and decks that are associated with a single dwelling unit or sleeping room and that are not used for common circulation are not considered gross floor area.

B. Floor area ratio (FAR) limits. The FAR limit in Neighborhood Residential zones for lots with residential uses is as shown in Table A for 23.44.050. The FAR limit in Neighborhood Residential zones for lots without residential uses is 1.2. The applicable FAR limit applies to the total chargeable floor area of all structures on the lot.

Table A for 23.44.050 Floor area ratio (FAR) in NR zones	
Density (dwelling units per lot size)	**FAR**
Less dense than 1 unit / 4,000 square feet	0.6
1 unit / 4,000 square feet to 1 unit / 2,201 square feet	0.8
1 unit / 2,200 square feet to 1 unit / 1,601 square feet	1.0
1 unit / 1,600 square feet or denser	1.2, except that it is 1.4 for stacked dwelling units located within a frequent transit service area on lots 6,000 square feet or larger

C. The following floor area is exempt from FAR limits:

1. All stories, or portions of stories, that are underground.

2. All portions of a story that extend no more than 4 feet above existing or finished grade, whichever is lower, excluding access.

3. Common walls separating individual attached dwelling units.

23.44.060 Maximum density and minimum lot size

A. Except as provided in subsection 23.44.060.C, the maximum density is:

1. For stacked dwelling units on lots larger than 6,000 square feet that are located in a frequent transit service area, one dwelling unit per 650 square feet of lot area;

2. For all other dwelling units, one dwelling unit per 1,250 square feet of lot area.

B. The minimum lot size for lots created after the effective date of this ordinance is 5,000 square feet.

C. Maximum density exceptions

1. At least one dwelling unit is allowed on all lots in existence as of the effective date of this ordinance.

2. A lot that is less than 5,000 square feet may be developed with up to four dwelling units provided that the lot does not contain any riparian corridors; wetlands and their

buffers; submerged lands and areas within the shoreline setback; or designated non-disturbance area in steep slopes.

3. A lot that is less than 7,500 square feet and within one-quarter mile walking distance of a stop on a major transit service may be developed with up to six dwelling units if the lot does not contain any riparian corridors; wetlands and their buffers; submerged lands and areas within the shoreline setback; or designated non-disturbance area in steep slopes.

4. A lot that is less than 7,500 square feet and located more than one-quarter mile walking distance from a stop on a major transit service may be developed with up to six dwelling units if the lot meets the following criteria:

a. The lot does not contain any riparian corridors; wetlands and their buffers; submerged lands and areas within the shoreline setback; or designated non-disturbance area in steep slopes;

b. At least two principal dwelling units are low-income units subject to a regulatory agreement, covenant, or other legal instrument enforceable by The City of Seattle;

c. The low-income units are generally distributed throughout the development and have substantially the same functionality as unrestricted units in the development;

d. To the extent practicable, the low-income units are comparable to unrestricted units in terms of square footage and number of bedrooms and bathrooms;

e. The tenure (i.e., rental or ownership) of low-income units and unrestricted units is the same;

f. The regulatory agreement, covenant, or other legal instrument contains criteria and policies to maintain public benefit if the property is demolished or converted to a non-residential use;

g. For ownership housing, the low-income units are stewarded by a qualified non-profit organization, which for purposes of this subsection 23.44.060.C.4 means a non-profit organization that the Office of Housing determines as experienced in the development and stewardship of permanently affordable homes, including:

1) Pre-purchase verification of income and other requirements for eligible households, affordable sale price calculations for approval by the Office of Housing, and execution of legal restrictions on the property; and

2) Post-purchase support for homeowners by facilitating resales, monitoring compliance with financial, owner occupancy, and other legal requirements, and clear communication of program guidelines and restrictions; and

h. At such times as may be required by the Director of Housing but no less than annually, the property owner (for rental housing) or the qualified non-profit organization (for ownership housing) agrees to file property reports with the Office of Housing, verified upon oath or affirmation, which shall contain such information as the Office of Housing may deem necessary to determine compliance with this subsection 23.44.060.C.4 and the regulatory agreement, covenant, or other legal instrument.

5. For lots that contain any riparian corridors, wetlands and their buffers, submerged lands and areas within the shoreline setback, or designated non-disturbance area in steep slopes, applicants may choose to develop the lot with the number of dwelling units

provided in the density limits in subsection 23.44.060.A or with the number of dwelling units calculated as follows:

a. Determine the number of units that would be allowed under subsections 23.44.060.C.1 through 23.44.060.C.4 if no environmentally critical areas were located on the lot;

b. Determine the percentage of the lot that is not covered by riparian corridors, wetlands and their buffers, submerged lands and areas within the shoreline setback, or designated non-disturbance area in steep slopes; and

c. Calculate the number of dwelling units by multiplying the number of units determined in subsection 23.44.060.C.5.a by the percentage of the lot calculated in subsection 23.44.060.C.5.b.

D. Measurement of minimum lot size and maximum density

1. When calculation of the number of dwelling units allowed results in a fraction of a unit, any fraction shall be rounded down.

2. Congregate residence sleeping rooms shall be treated as one-fourth of a dwelling unit for purposes of calculating density.

3. In the case of a development within a unit lot subdivision, the density limit shall be applied to the parent lot as a whole.

4. If dedication of right-of-way is required, permitted density shall be calculated before the dedication is made.

5. When calculating density, the number of dwelling units shall include both accessory dwelling units and principal dwelling units.

6. Areas not counted in calculating the lot size. The following areas shall not be counted in calculating the area of lots for the purpose of calculating the maximum density and the minimum lot size:

a. Riparian corridors;

b. Wetlands and their buffers;

c. Submerged lands and areas within the shoreline setback; and

d. Designated non-disturbance area in steep slopes.

E. For the purpose of this Section 23.44.060, designated non-disturbance area in steep slopes shall include all portions of steep slope hazard areas except the following:

1. Areas that are granted relief from the prohibition of development according to Section 25.09.090;

2. Areas where development is allowed under a small project waiver according to Section 25.09.090; and

3. Areas where intrusion into the steep slope erosion hazard area and buffer is allowed by steep slope erosion hazard area variance according to Section 25.09.290.

23.44.070 Structure height

A. Maximum height established

1. Subject to the exceptions allowed in this Section 23.44.070, the height limit for any structure in NR zones is 32 feet.

2. The height limit for accessory structures that are located in required setbacks is 12 feet, except as follows:

a. The ridge of a pitched roof may extend up to 3 feet above the 12-foot height limit provided that all parts of the roof above the height limit shall be pitched at a rate of

not less than 4:12. No portion of a shed roof is permitted to extend beyond the 12-foot height limit.

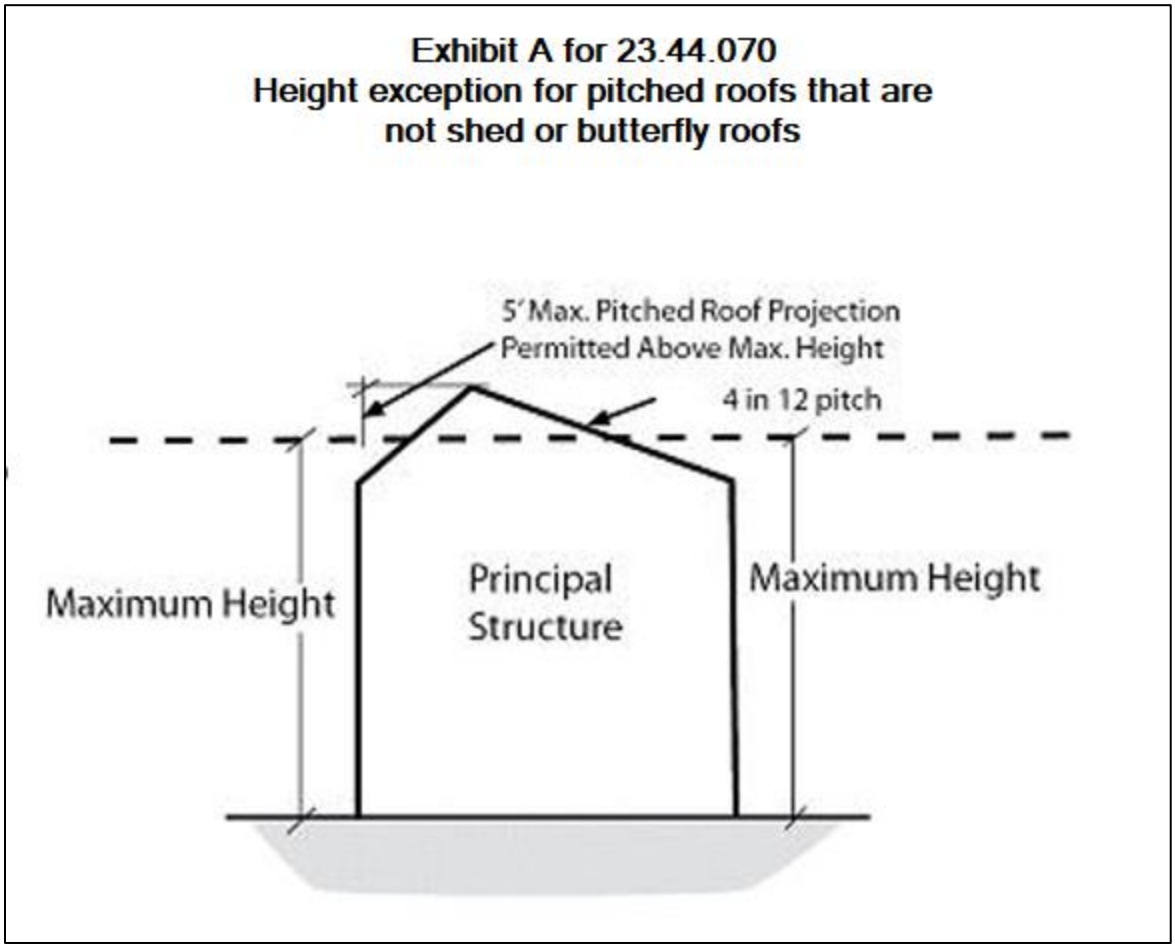
b. Freestanding flagpoles and religious symbols for religious institutions are exempt from height controls except as regulated in Chapter 23.64, provided they are no closer to any lot line than 50 percent of their height above existing grade.

B. Standards for pitched roofs

1. The ridge of a pitched roof that is not a shed or butterfly roof may extend up to 5 feet above the maximum height limit, as determined under subsection 23.44.070.A. All parts of the roof above the height limit must be pitched at a rate of not less than 4:12 (see Exhibit A for 23.44.070).

Exhibit A for 23.44.070

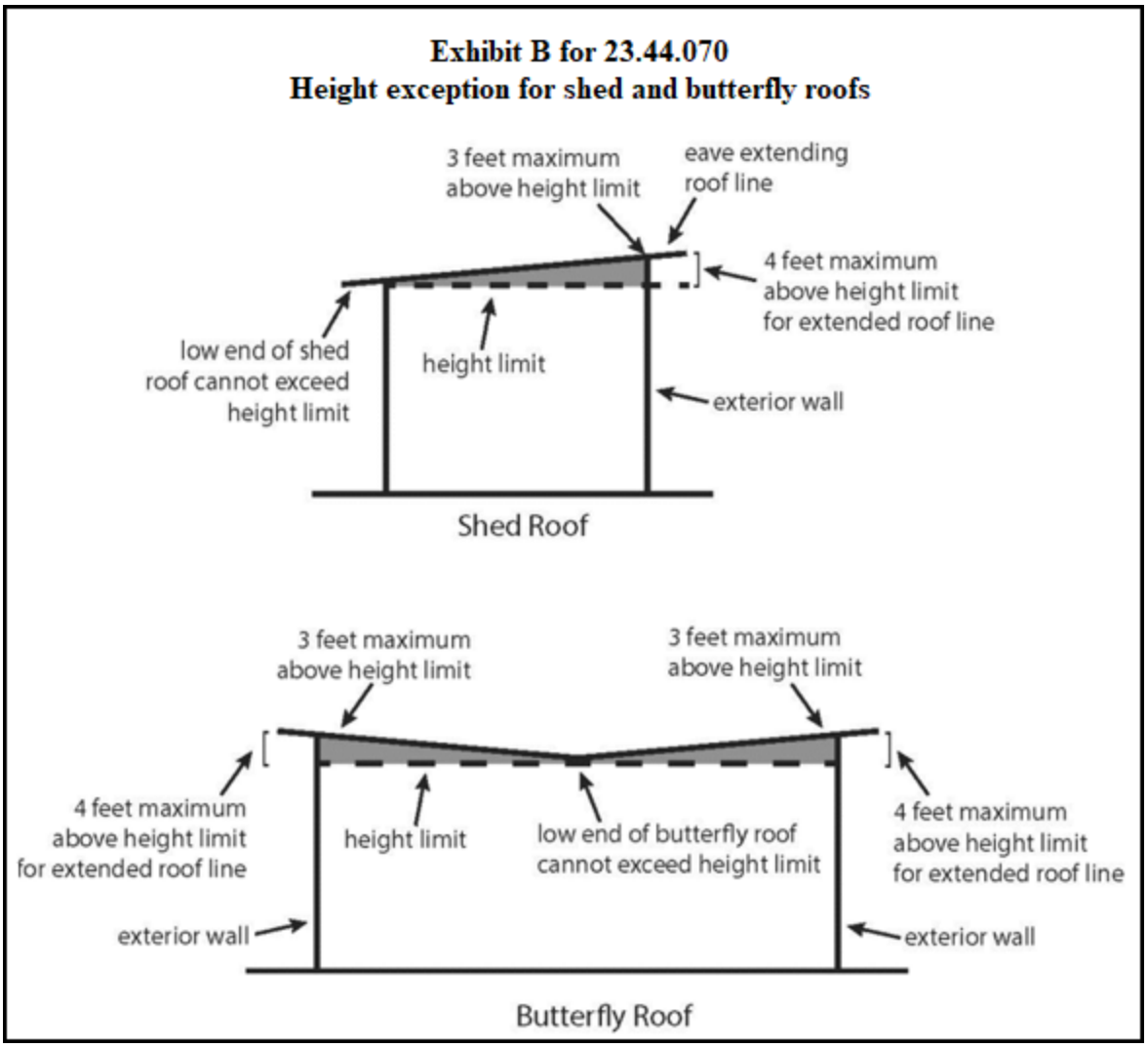
Height exception for pitched roofs that are not shed or butterfly roofs



2. The high side(s) of a shed or butterfly roof may extend 3 feet above the maximum height limit, as determined under subsection 23.44.070.A, provided that the low side(s) of the shed or butterfly roof are no higher than the height limit (see Exhibit B for 23.44.070). The roof line of a shed or butterfly roof may be extended in order to accommodate eaves, provided that the highest point of the roof extension is no more than 4 feet above the height limit.

Exhibit B for 23.44.070

Height exception for shed and butterfly roofs



C. Height limit exceptions

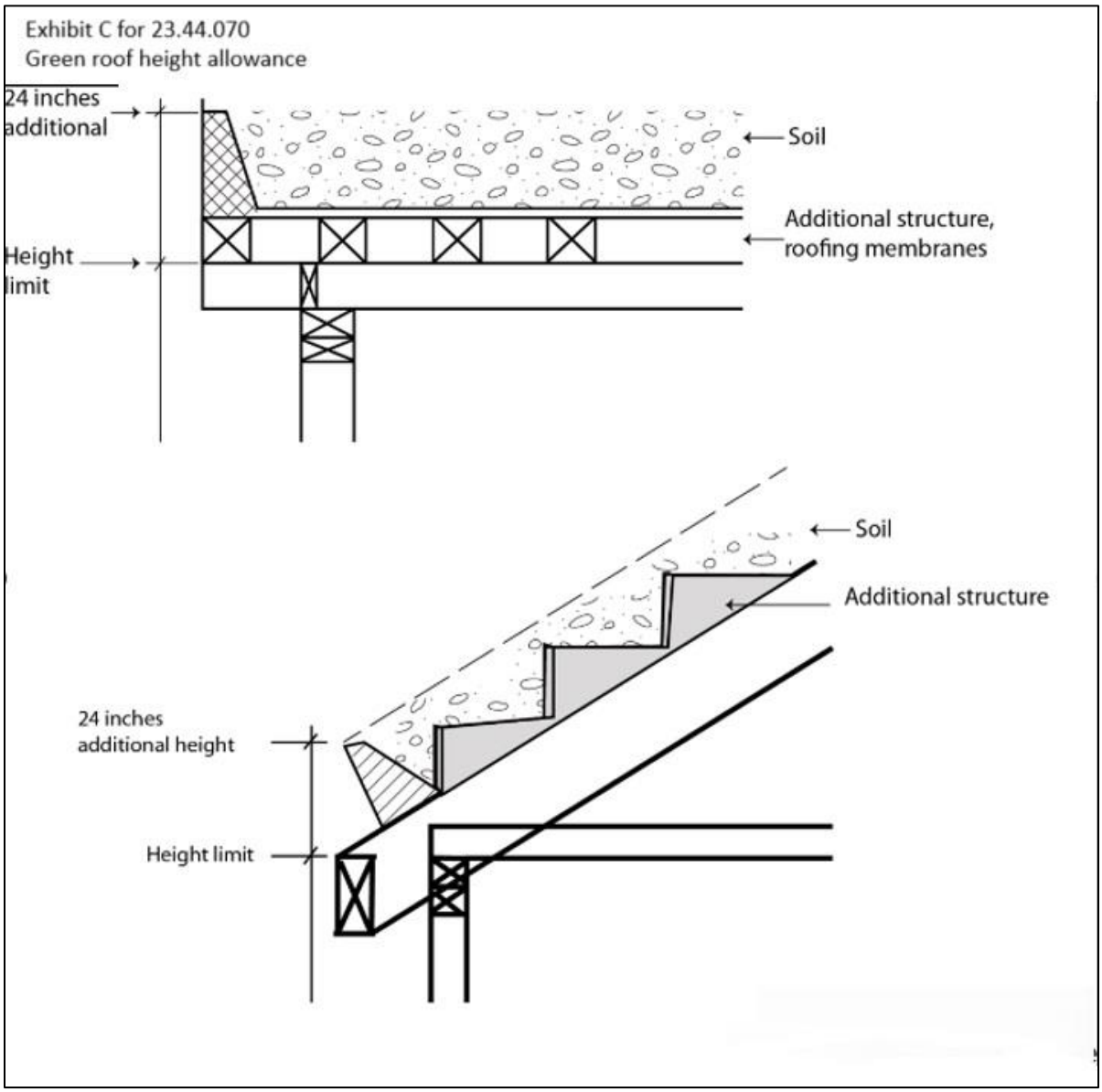
1. Except in the Airport Height Overlay District, flagpoles are exempt from height limits, provided that they are no closer to any adjoining lot line than 50 percent of their height above existing grade, or, if attached only to a roof, no closer than 50 percent of their height above the roof portion where attached.

2. Open railings, planters, greenhouses not dedicated to food production, parapets, and firewalls may extend 4 feet above the height limit in subsection 23.44.070.A. Planters on flat roofs shall not be located within 4 feet of more than 25 percent of the perimeter of the roof.

3. Green roofs may extend 2 feet above the height limit in subsection 23.44.070.A or above a pitched roof allowed in subsection 23.44.070.B.

Exhibit C for 23.44.070

Green roof height allowance



4. Solar collectors may extend 4 feet above the height limit in subsection 23.44.070.A or above a pitched roof allowed in subsection 23.44.070.B.

5. For nonresidential principal uses, the following rooftop features may extend up to 10 feet above the height limit in subsection 23.44.070.A, as long as the combined total coverage of all features listed in this subsection 23.44.070.C.5 does not exceed 15 percent of the roof area or 20 percent of the roof area if the total includes screened or enclosed mechanical equipment:

a. Stair and elevator penthouses;

b. Mechanical equipment;

c. Wind-driven power generators; or

d. Chimneys.

6. Devices for generating wind power may extend up to 10 feet above the height limit in subsection 23.44.070.A, provided that the combined total coverage of all features does not exceed 15 percent of the roof area.

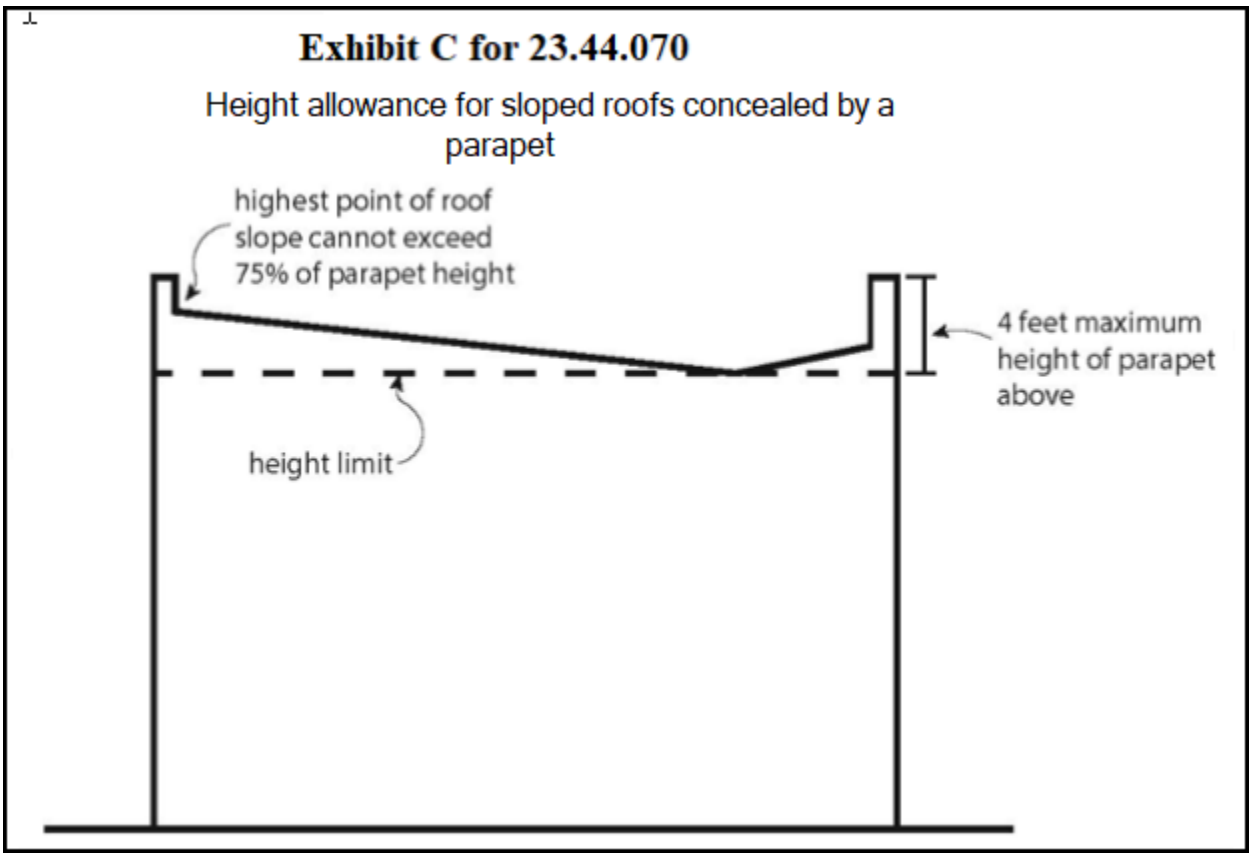
7. For height limits and exceptions for communication utilities and accessory communication devices, see Section 23.57.010.

8. Buildings existing prior to the effective date of this ordinance are permitted to extend up to 8 inches above the height limit in subsection 23.44.070.A or a pitched roof allowed in subsection 23.44.070.B solely for the purpose of adding insulation to an existing roof.

9. Roofs enclosed by a parapet. Roof surfaces that are completely surrounded by a parapet may exceed the applicable height limit to allow for a slope, provided that the height of the highest elevation of the roof surface does not exceed 75 percent of the parapet height, and provided that the lowest elevation of the roof surface is no higher than the applicable height limit. See Exhibit C for 23.44.070.

Exhibit C for 23.44.070

Height allowance for sloped roofs concealed by a parapet



23.44.080 Lot coverage

A. Except as otherwise provided in this Section 23.44.080, the maximum lot coverage allowed for structures is 50 percent.

B. The following areas shall not be counted in calculating the lot size for the purpose of calculating lot coverage in this Section 23.44.080:

1. Riparian corridors;

2. Wetlands and their buffers;

3. Submerged lands and areas within the shoreline setback; and

4. Designated non-disturbance area in steep slopes.

C. Structures not counted. The following structures and portions of structures are not counted in lot coverage calculations:

1. Underground structures;

2. The first 36 inches of architectural features such as cornices, eaves, gutters, roofs, fireplaces, chimneys, and other similar features that project from principal and accessory structures;

3. Decks or parts of a deck that are 36 inches or less above existing grade;

4. Unenclosed porches or steps no higher than 4 feet above existing grade, or the grade at the street lot line closest to the porch, whichever is lower; and

5. Unenclosed structures that meet the standards of subsection 23.44.090.H.

D. The lot coverage allowed on lots containing areas listed in subsection 23.44.080.B shall not be less than 625 square feet or an amount of lot coverage approved by the Director through an environmentally critical area reduction, waiver, or modification pursuant to Chapter 25.09, whichever is greater.

E. For the purpose of this Section 23.44.080, designated non-disturbance area in steep slopes shall include all portions of steep slope hazard areas except the following:

1. Areas that are granted relief from the prohibition of development according to Section 25.09.090;

2. Areas where development is allowed under a small project waiver according to Section 25.09.090; and

3. Areas where intrusion into the steep slope erosion hazard area and buffer is allowed by steep slope erosion hazard area variance according to Section 25.09.290.

23.44.090 Setbacks

A. Required setbacks for the NR zones are shown in Table A for 23.44.090.

Table A for 23.44.090
Required setbacks in Neighborhood Residential zones

Front	10 feet
Rear	5 feet for accessory dwelling units and 10 feet for other structures except that, if the rear setback abuts an alley, no rear setback is required [1]
Side	5 feet, except that no side setback is required from a side lot line that abuts an alley[1]

Footnote for Table A for 23.44.090
[1] On a reversed corner lot, the setback on the side street lot line shall be 10 feet and the rear setback is 5 feet.

B. Through lots. In the case of a through lot, each setback abutting a street, shall be a front setback.

C. Other setback requirements. Additional structure setbacks may be required in order to meet the provisions of Chapter 23.53.

D. Underground structures. Underground structures, measured from existing or finished grade, whichever is lower, may be located within setbacks.

E. Projections from an enclosed structure allowed in required setbacks

1. Architectural features such as cornices, eaves, gutters, roofs, fireplaces, chimneys, and other similar features may project into required setbacks a maximum of 2 feet if they are no closer than 3 feet to any lot line.

2. Garden windows and other similar features that do not provide floor area may project a maximum of 18 inches into required setbacks if they:

a. Are a minimum of 30 inches above the finished floor;

b. Are no more than 6 feet in height and 8 feet wide; and

c. Combined with bay windows and other similar features that provide floor area, make up no more than 30 percent of the area of the facade.

3. Bay windows and other similar features that provide floor area may project a maximum of 2 feet into required front and rear setbacks if they:

a. Are no closer than 5 feet to any lot line;

b. Are no more than 10 feet in width; and

c. Combined with garden windows and other projections included in subsection 23.44.090.E.2, make up no more than 30 percent of the area of the facade.

4. Unenclosed porches and steps

a. Unenclosed porches or steps no higher than 4 feet above existing grade, or the grade at the street lot line closest to the porch, whichever is lower, may extend to within 5 feet of a street lot line and 3 feet of a side lot line.

b. Porches or steps may be covered, provided that:

1) No portions of the cover-structure, including any supports, are closer than 5 feet to any lot line;

2) The height of the roof over unenclosed porch or steps shall not exceed 15 feet above existing or finished grade, whichever is lower;

3) The roof over such porches or steps shall not be used as a deck; and

4) The total area of porches attached to any individual dwelling unit and located in the setback is not more than 60 square feet.

F. Structures with ground-floor commercial uses. The ground floor of a structure containing a ground-floor commercial use may extend into one front setback provided it is not located closer than 2 feet from a front lot line.

G. Garages and carports

1. Garages and carports may be located in a setback where parking is allowed in a setback as provided in subsections 23.44.160.D.4 and 23.44.160.D.5.

2. Garages and carports may be located in a required side setback that abuts the rear or side setback of another lot if:

a. The garage or carport is a detached structure and extends only into that portion of a side setback that is either within 40 feet of the centerline of an alley or within 25 feet of any rear lot line that is not an alley lot line; or

b. An agreement between the owners of record of the abutting properties, authorizing the garage or carport in that location, is executed and recorded with the King County Recorder's Office.

3. Garages and carports may be located in the rear setback provided they are not located within 5 feet of the rear property line.

4. Garages and carports allowed in required setbacks shall comply with all of the following standards:

a. The area of a garage or carport in front setbacks, is limited to 300 square feet with 14-foot maximum width if one space is provided, and 600 square feet with 24-foot maximum width if two spaces are provided.

b. Roof eaves and gutters that project up to 2 feet are excluded from the maximum coverage and size limits.

c. The roof shall not be used as a balcony or deck in rear or side setbacks.

H. Other unenclosed structures allowed in setbacks

1. All unenclosed structures not more than 18 inches above existing or finished grade, whichever is lower, are allowed in any required setback including but not limited to decks, swimming pools, and hot tubs.

2. Barrier-free access. Access facilities for the disabled and elderly, are allowed in any required setback.

3. Freestanding signs, bike racks, play structures, and similar unenclosed structures that are 6 feet or less in height above existing or finished grade, whichever is lower, are allowed in any required setback, provided that:

a. Signs meet the provisions of Chapter 23.55;

b. Structures located in a side setback allow a 2.5-foot-wide pathway through the side setback; and

c. Structures located within 5 feet of a front lot line are not more than 4 feet in height.

4. Fences

a. Fences no greater than 6 feet in height are allowed in any required setback, except that fences in the required front setback extended to side lot lines or in street side setbacks extended to the front and rear lot lines may not exceed 4 feet in height. Fences located on top of a bulkhead or retaining wall are also limited to 4 feet. If a fence is placed on top of a new bulkhead or retaining wall used to raise grade, the maximum combined height is limited to 9.5 feet.

b. Except for fences in the required front setback extended to side lot lines or in street side setbacks extended to the front and rear lot lines, up to 2 feet of additional height for architectural features such as arbors or trellises on the top of a fence is allowed if the architectural features are predominately open.

c. Fence height may be averaged along sloping grades for each 6-foot-long segment of the fence, but in no case may any portion of the fence exceed 8 feet in height when the height allowed by subsection 23.44.090.H.4.a is 6 feet, or 6 feet in height when the height allowed by subsection 23.44.090.H.4.a is 4 feet.

5. Bulkheads and retaining walls

a. Bulkheads and retaining walls used to raise grade are allowed in any required setback if they are limited to 6 feet in height, measured above existing grade.

b. Bulkheads and retaining walls used to protect a cut into existing grade may not exceed the minimum height necessary to support the cut or 6 feet measured from the finished grade on the low side, whichever is greater. Any fence shall be set back a minimum of 3 feet from such a bulkhead or retaining wall.

6. Mechanical equipment. Heat pumps, charging devices for electric vehicles, and similar mechanical equipment, not including incinerators, are allowed in required setbacks if they are not located within 3 feet of any lot line.

7. Access bridges. Uncovered, unenclosed access bridges are allowed as follows:

a. Pedestrian bridges 5 feet or less in width, and of any height necessary for access, are permitted in required setbacks, except that in side setbacks an access bridge must be at least 3 feet from any side lot line.

b. A driveway access bridge is permitted in the required setback abutting the street if necessary for access to parking. The vehicular access bridge shall be no wider than 12 feet for access to one parking space or 22 feet for access to two or more parking spaces and of any height necessary for access. The driveway access bridge may not be located closer than 5 feet to any side lot line.

8. Unenclosed structures are allowed in the rear setback provided that the structure is:

a. Not located within 5 feet of a rear lot line that is not an alley lot line;

b. Not more than 12 feet in height; and

c. Separated from a dwelling unit by at least 3 feet, eave to eave.

9. Above-grade stormwater management features, such as bioretention planters and cisterns, are allowed in setbacks if:

a. No feature, excluding piping, is more than:

1) Twelve feet tall if located in a portion of the rear setback that is not also a side setback; or

2) Six and a half feet tall, if located in other setbacks.

b. No feature greater than 4.5 feet tall is located within 10 feet of the front lot line, excluding piping, unless it is integrated into a bulkhead or retaining wall that is allowed in subsection 23.44.090.H.5;

c. No feature greater than 6 inches tall is located within 2.5 feet of the side lot line; and

d. The total storage capacity of all above-grade cisterns located in setbacks is no greater than 1,250 gallons.

10. Guardrails or handrails no more than 42 inches are allowed on unenclosed stairs, decks, access bridges, bulkheads, and retaining walls.

I. Other enclosed structures allowed in setbacks

1. Any accessory structure that is not a dwelling unit may be constructed in a side or rear setback that abuts the rear or side setback of another lot upon recording with the King County Recorder's Office an agreement to this effect between the owners of record of the abutting properties.

2. Enclosed structures that are not dwelling units are allowed in the rear setback provided that:

a. They are not located within 5 feet of a rear lot line that is not an alley lot line;

b. They are not more than 12 feet in height; and

c. They are separated from a dwelling unit by at least 3 feet, eave to eave.

J. Certain additions. An addition to an existing dwelling unit may extend into a required side setback if:

1. The existing dwelling unit is already nonconforming with respect to that setback;

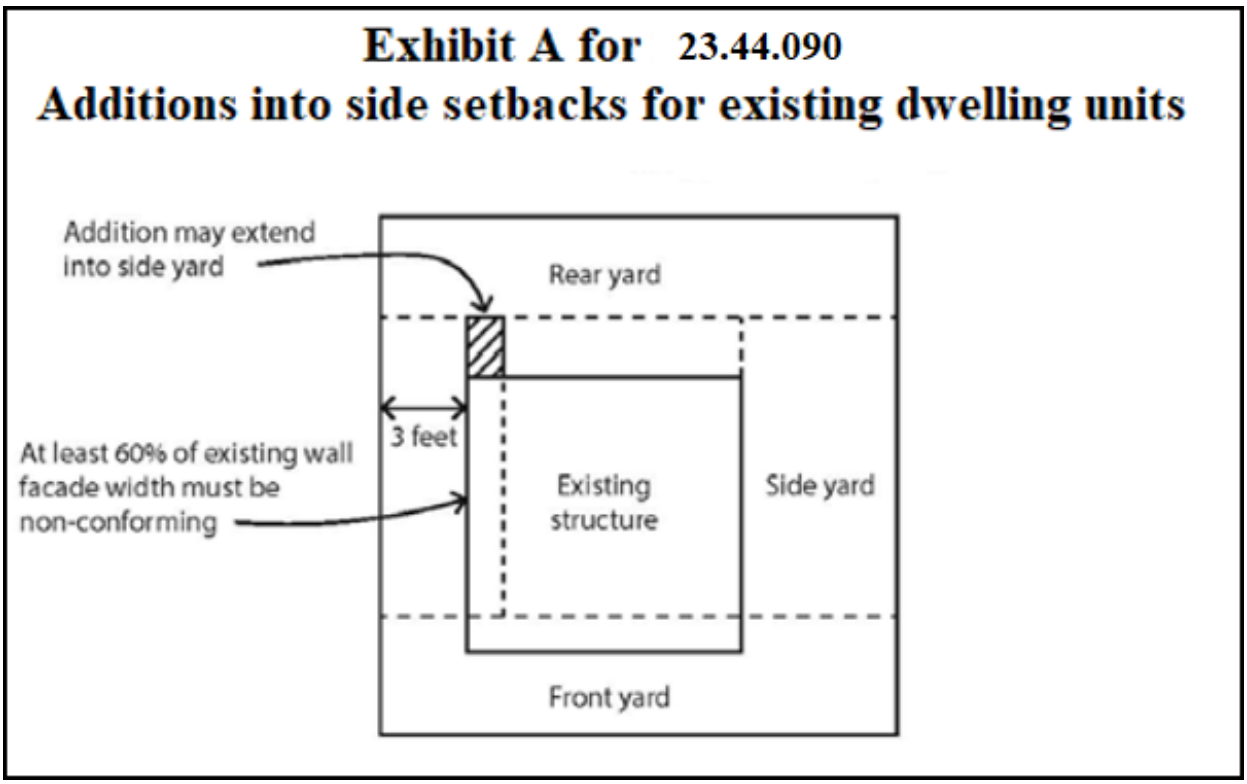
2. The portion of the dwelling unit that is presently nonconforming is at least 60 percent of the total width of the respective facade of the structure prior to the addition;

3. The addition would not be located within 3 feet of a side lot line; and

4. The addition would not be located any closer to the side lot line than the closest part of the existing structure.

Exhibit A for 23.44.090

Additions into side setbacks for existing dwelling units



K. A structure may be permitted to extend into front and rear setbacks as necessary to protect Tier 1 and Tier 2 trees pursuant to Section 25.11.070.

23.44.100 Separations between structures

A. The minimum required separation between structures containing floor area is 6 feet except that if the structures are separated by a driveway or parking aisle, the minimum required separation between the structures is 2 feet greater than the required width of the driveway or parking aisle or 24 feet, whichever is less.

B. If structures containing floor area are separated by a driveway or parking aisle, projections that enclose floor area may extend a maximum of 3 feet into the required separation if they are at least 8 feet above finished grade.

C. Architectural features such as cornices, eaves, gutters, roofs, fireplaces, chimneys, and other forms of weather protection may project into required separations a maximum of 2 feet. Garden windows, bay windows, covered porches and patios, balconies, and enclosed structures are not allowed in the required separation. Detached structures that are up to 10 feet in height and used exclusively for bike parking are allowed in required separations.

23.44.110 Amenity area

A. The amount of required amenity area is equal to 20 percent of the lot area.

B. All dwelling units shall have access to either a common or private amenity area.

C. For attached and detached dwelling units, required ground-level amenity areas may be provided as either private or common space. For stacked dwelling units, at least half of the amenity area shall be provided as common space.

D. A minimum of 50 percent of the required amenity area shall be provided at ground level or within 4 feet of existing grade. In calculating the total amount of amenity area, only half of the amenity area that is not provided at ground level or within 4 feet of existing grade shall count toward the required amenity area.

E. Amenity area shall not be enclosed within a structure.

F. Each amenity area shall be at least 120 square feet in area and have a minimum width and depth of 8 feet.

G. Features in amenity areas

1. The following features are not allowed in amenity areas:

a. Vehicular parking areas, vehicular access easements, and driveways;

b. Required bike parking;

c. Solid waste and recyclable material storage area; and

d. Enclosed structures.

2. Pathways serving multiple dwelling units are not allowed in private amenity areas.

3. Decks, porches, and steps; swimming pools, spas, and hot tubs; stormwater management features, including but not limited to bioretention planters and cisterns; play equipment; and similar features are allowed in amenity areas.

4. Amenity areas may be covered by weather protection.

5. Projections that do not provide floor area may extend into an amenity area if they meet the standards for projections into setbacks in subsection 23.44.090.E and if garden windows and other similar features are at least 8 feet above finished grade.

6. Rooftop areas located within 8 feet of minor communication utilities and accessory communication devices do not qualify as amenity areas.

H. Areas in environmentally critical areas and their buffers, including but not limited to steep slopes, may count toward amenity areas.

I. No amenity area is required for one new dwelling unit added to a dwelling unit existing as of January 1, 1982, or for one new dwelling unit added to a multifamily residential use existing as of October 10, 2001.

23.44.120 Tree requirements

A. Development containing one or more new dwelling units must plant or retain trees to achieve the number of tree points listed in Table A for 23.44.120.

Table A for 23.44.120
Number of tree points required

Density (dwelling units per lot size)	**Tree points required per lot area [1]**
Less dense than 1 unit / 4,000 square feet	1 point / 500 square feet
1 unit / 4,000 square feet to 1 unit / 2,201 square feet	1 point / 600 square feet
1 unit / 2,200 square feet to 1 unit / 1,601 square feet	1 point / 675 square feet

Table A for 23.44.120 **Number of tree points required**	
Density (dwelling units per lot size)	**Tree points required per lot area [1]**
1 unit / 1,600 square feet or denser	1 point / 750 square feet
Footnote to Table A for 23.44.120 [1] For purposes of this Section 23.44.120, lot area shall not include submerged lands.	

B. Individual trees preserved during construction or planted as part of construction, excluding street trees, count toward the tree score according to Table B for 23.44.120. Trees required under Section 25.11.090 shall count toward this standard. All required trees shall meet standards promulgated by the Director to provide for the long-term health and viability of plantings. These standards may include but are not limited to tree selection, invasive species, planting specification, soil and mulch amendment, and protection practices during construction.

Table B for 23.44.120
Tree points

Type of tree	**Tree species**	**Points for deciduous trees**	**Points for evergreen trees**
Trees planted as part of construction	Small	1 point	1.25 point
	Small/medium	2 points	2.5 points
	Medium/large	3 points	3.75 points
	Large	4 points	5 points
Trees preserved during construction	Small	0.4 point per inch of diameter	0.5 point per inch of diameter
	Small/medium	0.8 point per inch of diameter	1 point per inch of diameter
	Medium/large	1.2 point per inch of diameter	1.4 point per inch of diameter

Table B for 23.44.120 Tree points			
Type of tree	**Tree species**	**Points for deciduous trees**	**Points for evergreen trees**
	Large	1.6 point per inch of diameter	1.8 point per inch of diameter

C. Tree protection areas shall be designated in accordance with Section 25.11.060 for all trees that are proposed to be preserved to receive points under subsection 23.44.120.B, regardless of tree tier.

D. The owner of the subject lot is required to ensure that the trees planted remain healthy for at least five years after inspection by the City, and the owner of the subject lot shall be responsible for replacing any trees that do not remain healthy after inspection by the City.

E. Tree measurements

1. New trees planted to meet this requirement shall meet the following size standards:

a. Deciduous trees with one trunk must be at least 1.5 inches in diameter, measured 6 inches above the ground.

b. Multi-stemmed deciduous trees must have at least three stems and be at least 6 feet tall.

c. Evergreen trees must be at least 4 feet tall.

2. Existing trees shall be measured 4.5 feet above the ground.

F. Tree location. New trees planted to meet this requirement shall not be planted:

1. For small species trees, within 2 feet of a dwelling unit;

2. For small/medium species trees, within 4 feet of a dwelling unit;

3. For medium/large species trees, within 6 feet of a dwelling unit;

4. For large species trees, within 8 feet of a dwelling unit; and

5. For all trees, within 2 feet of a sidewalk located in the right-of-way.

G. Street tree requirements

1. Street trees are required for development that would add one or more principal dwelling units on a lot, except as provided in subsection 23.44.120.G.2 and Section 23.53.015. Existing street trees shall be retained unless the Director of the Seattle Department of Transportation approves their removal. The Director, in consultation with the Director of the Seattle Department of Transportation, shall determine the number, type, and placement of additional street trees to be provided in order to:

a. Improve public safety;

b. Promote compatibility with existing street trees;

c. Match trees to the available space in the planting strip;

d. Maintain and expand the urban forest canopy;

e. Encourage healthy growth through appropriate spacing;

f. Protect utilities; and

g. Allow access to the street, buildings, and lot.

2. Exceptions to street tree requirements

a. If a lot borders an unopened right-of-way, the Director may reduce or waive the street tree requirement along that right-of-way as a Type I decision if, after consultation with the Director of the Seattle Department of Transportation, the Director determines that the right-of-way is unlikely to be opened or improved.

b. If it is not feasible to plant street trees in a right-of-way planting strip, a 5-foot setback shall be planted with trees along the street lot line that abuts the required front

setback, or landscaping other than trees shall be provided in the planting strip, subject to approval by the Director of the Seattle Department of Transportation. If a 5-foot setback or landscaped planting strip is not feasible, the Director may reduce or waive this requirement as a Type I decision.

23.44.130 Structure width limits

Structure width for each building containing residential uses in Neighborhood Residential zones may not exceed 90 feet. Measurement of structure width is provided in Section 23.86.014.

23.44.140 Design standards

A. Application of provisions.

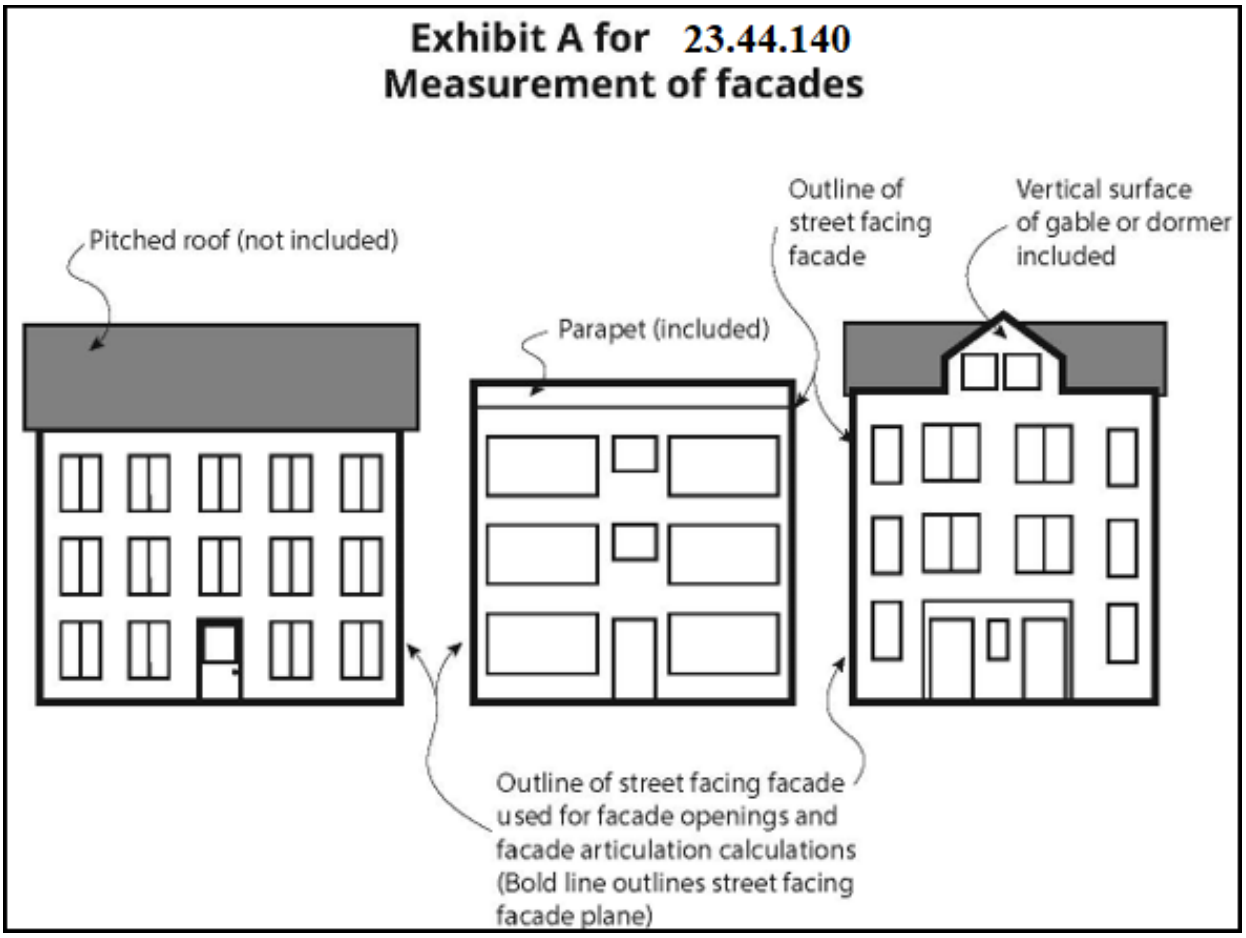
1. The provisions of this Section 23.44.140 apply to development that includes the construction of new dwelling units, except for new dwelling units added within existing structures.

2. For the purposes of this Section 23.44.140, requirements for street-facing facades shall only apply to structures located within 40 feet of a street lot line or a vehicle access easement serving ten or more residential units. For structures located within 40 feet of a vehicle access easement serving ten or more residential units but not within 40 feet of a street lot line, the facade that faces the vehicle access easement shall be considered a street-facing facade for the purpose of this Section 23.44.140. If multiple facades face vehicle access easements, the applicant may decide which facade facing a vehicle access easement is considered the street-facing facade.

B. Measurement of street-facing facades. For the purposes of this Section 23.44.140, a street-facing facade includes all vertical surfaces enclosing interior space, including gables and dormers, as shown in Exhibit A for 23.44.140.

Exhibit A for 23.44.140

Measurement of facades



C. Pedestrian access. Each dwelling unit shall have pedestrian access at least 3 feet in width to the sidewalk or, if no sidewalk exists, the front lot line. This pedestrian access may be shared or private. This pedestrian access may cross any required setbacks or interior separation. This pedestrian access may be part of a driveway.

D. Entrances. Each structure with a street-facing facade shall have a pedestrian entry on that street-facing facade meeting the requirements of subsections 23.44.140.D.1 through

23.44.140.D.4. For attached and detached dwelling units, the pedestrian entry may be located on a wall perpendicular to the street-facing facade provided that the pedestrian entry abuts a covered porch or recessed entry that also abuts the street-facing facade.

1. For stacked dwelling units, at least one pedestrian entry shall be required for the structure as a whole.

2. For attached and detached dwelling units, each individual dwelling unit with a street-facing facade within 40 feet of the street lot line shall have at least one pedestrian entry on the street-facing facade.

3. For structures or dwelling units with multiple street-facing facades, a pedestrian entry is required on only one of the street-facing facades.

4. Required pedestrian entry on street-facing facades shall have weather protection, such as a covered porch, canopy, recessed entry, or similar feature, measuring at least 3 feet by 3 feet in width and depth for attached and detached dwelling units and at least 6 feet in width and 4 feet in depth for stacked dwelling units.

E. Windows and doors. At least 20 percent of the area of each street-facing facade shall consist of windows and/or doors. If front and side facades are street-facing, the two facades shall be combined for the purpose of this calculation. Windows count toward the requirement for facade openings in this subsection 23.44.140.E only if they are transparent. Windows composed of garage doors and doors to utility and service areas do not count.

23.44.150 Light and glare standards

A. Exterior lighting shall be shielded and directed away from adjacent properties.

B. To prevent vehicle lights from affecting adjacent properties, driveways and parking areas for more than two vehicles shall be screened from abutting properties by a fence or wall

between 5 feet and 6 feet in height, or a solid evergreen hedge or landscaped berm at least 5 feet in height. If the elevation of the lot line is different from the finished elevation of the driveway or parking surface, the difference in elevation may be measured as a portion of the required height of the screen so long as the screen itself is a minimum of 3 feet in height. The Director may waive the requirement for the screening if it is not needed due to changes in topography, agreements to maintain an existing fence, or the nature and location of adjacent uses.

23.44.160 Parking location and access

A. Parking quantity. Off-street parking is required pursuant to Section 23.54.015.

B. Parking on same lot. Any required parking shall be located on the same lot as the principal use, except that parking accessory to a floating home, floating on-water residence, house barge, or vessel with a dwelling unit may be located on another lot if within 600 feet of the lot on which the floating home, floating on-water residence, house barge, or vessel with a dwelling unit is located.

C. Access to parking

1. Vehicular access to parking from an improved street, alley, or easement is required if parking is provided.

2. Access to parking is permitted from a street only if the Director determines that one of the following conditions exists:

a. There is no alley improved to the standards of subsection 23.53.030.B, and there is no unimproved alley in common usage that currently provides access to parking on the lot or to parking on adjacent lots in the same block;

b. Existing topography does not permit alley access;

c. At least 50 percent of alley frontage abuts property in a nonresidential zone;

d. Due to the relationship of the alley to the street system, use of the alley for parking access would create a significant safety hazard;

e. Parking access must be from the street in order to provide access to a parking space that complies with Chapter 11 of the Seattle Building Code; or

f. Providing alley access would require removal of a tree on private property that is a Tier 1 or Tier 2 tree and all other applicable criteria for tree protection in Chapter 25.11 are met.

D. Location of parking. Except as provided below, parking is not allowed within 20 feet of a front lot line or within 5 feet of a side street lot line:

1. If access to required parking passes through a required setback, automobiles, motorcycles, and similar vehicles may be parked on the open access located in a required setback.

2. If access is taken directly from an alley, surface parking may be located within 20 feet of a street lot line if it is located within 28 feet of an alley lot line and is no closer than 7 feet to any street lot line.

3. For lots at least 40 feet in width, up to two surface parking spaces are allowed within 20 feet of a street lot line provided:

a. Access to parking is allowed through the required setback abutting the street by subsection 23.44.160.C;

b. The parking spaces are located perpendicular to the street lot line from which they are accessed;

c. On corner lots, the parking spaces are not located within 20 feet of the street lot line parallel to the parking spaces;

d. No other parking spaces or driveways are located on the lot;

e. The parking spaces are not located within 10 feet of a street lot line; and

f. The combined width of the parking spaces shall not exceed 20 feet.

4. Lots with uphill setbacks abutting streets. Parking may be located in a required setback abutting a street provided:

a. Access to parking is allowed through the required setback abutting the street by subsection 23.44.160.C;

b. The existing grade of the lot slopes upward from the street lot line an average of at least 6 feet above sidewalk grade at a line that is 10 feet from the street lot line;

c. The parking area shall be at least an average of 6 feet below the existing grade prior to excavation and/or construction at a line that is 10 feet from the street lot line;

d. No other parking spaces or driveways are located on the lot;

e. If no garage is provided, the combined width of the parking spaces shall not exceed 20 feet. If a garage is provided, the width of a garage structure shall not exceed 24 feet; and

f. The total width of parking spaces and garages is not more than 60 percent of the width of the lot.

5. Lots with downhill setbacks abutting streets. Parking may be located in a required setback abutting a street if the following conditions are met:

a. Access to parking is allowed through the required setback abutting the street by subsection 23.44.160.C;

b. The existing grade slopes downward from the street lot line that the parking faces;

c. For parking located in a front setback, the lot has a vertical drop of at least 6 feet in the first 10 feet, measured along a line from the midpoint of the front lot line to the midpoint of the rear lot line;

d. Parking is not located in required side setbacks abutting a street;

e. No other parking spaces or driveways are located on the lot;

f. If no garage is provided, the combined width of the parking spaces shall not exceed 20 feet. If a garage is provided, the width of a garage structure shall not exceed 24 feet; and

g. The total width of parking spaces and garages is not more than 60 percent of the width of the lot.

E. No more than three vehicles may be parked outdoors per dwelling unit on a lot.

F. Trailers, boats, recreational vehicles, and similar equipment shall not be parked in required setbacks, unless fully enclosed in a structure otherwise allowed in a required setback by subsection 23.44.160.D.

G. The total combined horizontal width of all garage entrances that are located on front facades may not be more than 50 percent of the horizontal width of the street-level front facades or 10 feet, whichever is greater. No dwelling unit may have a garage entrance on both a front facade and a side facade.

H. Except as provided in subsections 23.44.160.D.4 and 23.44.160.D.5, garage entrances facing the street shall be set back at least 20 feet from the street lot line.

23.44.170 Alternative standards for development of low-income housing

A. Development of low-income housing that meets all of the following criteria may meet the alternative development standards in subsection 23.44.170.B:

1. The lot is located within a frequent transit service area;

2. The restricted units are generally distributed throughout the development and have substantially the same functionality as unrestricted units, if any, in the development;

3. To the extent practicable, the restricted units are comparable to unrestricted units, if any, in terms of square footage and number of bedrooms and bathrooms;

4. The tenure (i.e., rental or ownership) of restricted units and unrestricted units, if any, is the same;

5. For ownership housing, the restricted units are stewarded by a qualified non-profit organization, which for purposes of this subsection 23.44.170.A means a non-profit organization that the Office of Housing determines as experienced in the development and stewardship of permanently affordable homes, including:

a. Pre-purchase verification of income and other requirements for eligible households, affordable sale price calculations for approval by the Office of Housing, and execution of legal restrictions on the property; and

b. Post-purchase support for homeowners by facilitating resales, monitoring compliance with financial, owner occupancy, and other legal requirements, and clear communication of program guidelines and restrictions; and

6. At such times as may be required by the Director of Housing but no less than annually, the property owner (for rental housing) or the qualified non-profit organization (for ownership housing) agree to file property reports with the Office of Housing, verified upon oath or affirmation, which shall contain such information as the Office of Housing may deem necessary to determine compliance with this subsection 23.44.170.A and the regulatory agreement, covenant, or other legal instrument.

B. Proposed development on a lot meeting the criteria in subsection 23.44.170.A may elect to meet the following development standards in lieu of the standards in subsections 23.44.050.B (floor area), 23.44.060.B (density), and 23.44.070.A (structure height), and Section 23.44.080 (lot coverage):

1. The maximum floor area ratio (FAR) limit is 1.8. The applicable FAR limit applies to the total chargeable floor area of all structures on the lot.

2. The maximum density limit is one unit per 400 square feet.

3. The maximum height limit is 42 feet.

4. The maximum lot coverage is 60 percent.

23.44.180 Institutions

A. Institutions located in a Neighborhood Residential zone shall meet the development standards of this Section 23.44.180 and other sections of Chapter 23.44 except as provided in Section 23.44.030, Chapter 23.51B, Chapter 23.69, or Chapter 23.79. In the event of conflict between the standards in this Section 23.44.180 and other sections of Chapter 23.44, the standards in this Section 23.44.180 shall control.

B. Height limits

1. The height limit for institutions shall be 32 feet, except as provided in subsection 23.44.180.B.2.

2. For gymnasiums, auditoriums, and wood shops that are accessory to an institution, the maximum permitted height is 35 feet if all portions of the structure above the height limit of the zone are set back at least 20 feet from all lot lines. Pitched roofs on the auditorium, gymnasium, or wood shop with a slope of not less than 4:12 may extend 10 feet above the 35-foot height limit. No portion of a shed roof on a gymnasium, auditorium, or wood shop is permitted to extend beyond 35 feet.

C. Landscaping

1. Landscaping that achieves a Green Factor score of 0.3 or greater, pursuant to Section 23.86.019, is required for any lot with:

a. Development, either a new structure or an addition to an existing structure, containing more than 4,000 new square feet of non-residential uses; or

b. Any parking lot containing more than 20 new parking spaces for automobiles.

2. All required trees shall meet standards promulgated by the Director to provide for the long-term health, viability, and coverage of plantings. These standards may include, but are not limited to, the type and size of plants, spacing of plants, depth, and quality of soil, access to light and air, and protection practices during construction.

D. Parking

1. Location of parking. Parking areas and facilities may be located anywhere on the lot except in the required front setback or side street setback.

2. Screening of surface parking areas. Surface parking areas for more than five vehicles shall be screened in accordance with the following requirements:

a. Screening shall be provided on each side of the parking area that abuts, or faces across a street, alley, or access easement, a lot in a residential zone.

b. Screening shall consist of a fence, solid evergreen hedge, or wall at least 3 feet in height.

E. Odors. The venting of odors, vapors, smoke, cinders, dust, gas, and fumes shall be at least 10 feet above finished sidewalk grade and directed away to the extent possible from residential uses within 50 feet of the vent.

F. Light and glare

1. Exterior lighting for institutions shall be shielded or directed away from residential structures on adjacent lots.

2. Poles for freestanding exterior lighting are permitted up to a maximum height of 32 feet. Light poles for illumination of athletic fields on new and existing public school sites will be allowed to exceed 30 feet pursuant to Chapter 23.51B.

G. The Director may allow, as a Type I decision, higher fencing in a required setback when necessary for sports fields.

23.44.190 Parks and open space

A. The following accessory uses shall be permitted in public parks when within a structure or on a terrace abutting the structure, provided that when the use is within 100 feet of another lot in a residential zone the use is completely enclosed:

1. The sale and consumption of beer and wine during daylight hours;

2. The sale and consumption of alcoholic beverages under a Class H liquor license at municipal golf courses during established hours of operation.

B. The sale and consumption of beer and wine with meals served in a restaurant facility within the boundaries of Woodland Park shall be permitted. The use shall be permitted in only one facility located no closer than 100 feet from any lot in a residential zone and separated from other public activity areas and zoo buildings by at least 50 feet.

C. Storage structures and areas and other structures and activities customarily associated with parks and playgrounds are subject to the following development standards in addition to the general development standards for accessory uses:

1. Any active play area shall be located 30 feet or more from any lot in a Neighborhood Residential zone;

2. Garages and service or storage areas shall be located 100 feet or more from any other lot in a residential zone and obscured from view from each such lot.

Section 31. Section 23.45.502 of the Seattle Municipal Code, last amended by Ordinance 125791, is amended as follows:

23.45.502 Scope of provisions

* * *

D. Other regulations((~~,~~)) may apply to development proposals including but not limited to general use provisions (Chapter 23.42); transportation concurrency and transportation impact mitigation (Chapter 23.52); requirements for streets, alleys, and easements (Chapter 23.53); standards for access, off-street parking, ((~~quantity, access, and design~~)) and solid waste storage (Chapter 23.54); ((~~standards for solid waste storage (Chapter 23.54)~~)); ((~~signs~~)) sign regulations (Chapter 23.55); communication regulations (Chapter 23.57); ((~~and methods for~~

~~measurements (Chapter 23.86), may apply to development proposals~~)) shoreline regulations (Chapter 23.60A); and environmental protection and historic preservation (Title 25).

E. Congregate residences are subject to additional requirements as specified in Section 23.42.049.

Section 32. Section 23.45.504 of the Seattle Municipal Code, last amended by Ordinance 127098, is amended as follows:

23.45.504 Permitted and prohibited uses

A. All uses are permitted outright, prohibited, or permitted as a conditional use according to Table A for 23.45.504 and this Section 23.45.504. Uses not referred to in Table A for 23.45.504 are prohibited, unless otherwise indicated in this Chapter 23.45 or Chapters 23.51A, 23.51B, or 23.57. Communication utilities and accessory communication devices, except as exempted in Section 23.57.002, are subject to ((~~the regulations in~~)) this Chapter 23.45 and ((~~additional regulations in~~)) Chapter 23.57. Public facilities are subject to ((~~the regulations in~~)) Section 23.51A.004.

B. All permitted uses are allowed as a principal use or as an accessory use, unless otherwise indicated in this Chapter 23.45.

Table A for 23.45.504 Permitted and prohibited uses		
Uses	**Permitted and prohibited uses by zone**	
	LR1, LR2, and LR3	**MR and HR**
* * *		
C. Uses not otherwise permitted in existing or former public schools	Permitted pursuant to	Permitted pursuant to

Table A for 23.45.504 **Permitted and prohibited uses**		
Uses	**Permitted and prohibited uses by zone**	
	LR1, LR2, and LR3	**MR and HR**
	procedures established in Chapter 23.78	procedures established in Chapter 23.78
((~~C.1. Child care centers, preschools, public or private schools, educational and vocational training for the disabled, adult evening education classes, nonprofit libraries, community centers, community programs for the elderly, and similar uses in existing or former public schools~~	~~P~~	~~P~~
~~C.2. Other non-school uses in existing or former public schools~~	~~Permitted pursuant to procedures established in Chapter 23.78~~	~~Permitted pursuant to procedures established in Chapter 23.78~~))
* * *		
E. Parks and ((~~playgrounds including customary~~)) open space uses	P	P
F. Ground-floor commercial uses	RC/P [4]	RC/P ((~~4.~~)) [5]
* * *		
L. Heat recovery incinerators	CU	CU
M. Human service uses	P	P
((~~L.~~)) N. All other uses	X	X
Key to Table A for 23.45.504 P = Permitted outright CU = Permitted as an administrative conditional use		

Table A for 23.45.504
Permitted and prohibited uses

Uses	**Permitted and prohibited uses by zone**	
	LR1, LR2, and LR3	**MR and HR**
RC = Permitted in areas zoned Residential Commercial (RC), and subject to the provisions of the RC zone, Chapter 23.46 X = Prohibited Footnotes to Table A for 23.45.504 [1] Institutions meeting development standards including but not limited to the standards in Section 23.45.570 are permitted outright; all others are administrative conditional uses pursuant to Section 23.45.506. The provisions of this Chapter 23.45 shall apply to Major Institution uses as provided in Chapter 23.69. [2] Prohibited in Station Area Overlay Districts (SAODs); otherwise, permitted as an administrative conditional use pursuant to Section 23.45.506 on surface parking existing as of January 1, 2017. [3] Prohibited in LR1 and LR2 zones, including LR1/RC and LR2/RC. Permitted outright in LR3, MR, HR, and LR3/RC zones, except prohibited in ((~~the~~)) a SAOD. [4] ((~~Permitted in development that meets~~)) For lots located in a zone that does not include an RC designation, ground-floor commercial uses are allowed if they meet the requirements of Section 23.42.055 and Chapter 23.46 or the standards of subsection 23.45.504.D ((~~even if it is not located in a zone that includes an RC designation~~)). [5] ((~~Subject to subsection 23.45.504.E except in zones that include an RC designation.~~)) For lots located in a zone that does not include an RC designation, ground-floor commercial uses are allowed if they meet the standards of subsection 23.45.504.E and Section 23.45.532. [6] Subject to subsections 23.45.504.G and 23.45.506.F. [7] Subject to subsection 23.45.504.F. [8] Prohibited in LR1 and LR2 zones. Permitted outright in all other multifamily zones as surface parking on surface parking lots existing as of January 1, 2017; permitted outright in garages; subject to Section 23.54.026. ((~~P = Permitted outright~~ ~~CU = Permitted as an Administrative Conditional Use~~ ~~RC = Permitted in areas zoned Residential Commercial (RC), and subject to the provisions of the RC zone, Chapter 23.46~~ ~~X = Prohibited~~))		

C. Accessory uses. The following accessory uses are permitted in all multifamily zones, subject to ((~~the standards in~~)) Section 23.45.545, if applicable:

1. Private garages and carports;

2. Private, permanent swimming pools, hot tubs, and other similar uses;

3. Solar collectors, including solar greenhouses;

4. ((~~Open wet moorage accessory to residential structures;~~)) Piers and floats, provided they comply with Chapter 23.60A;

5. Uses accessory to parks and playgrounds, pursuant to Section 23.45.578;

6. Bed and breakfasts in a dwelling unit that is at least five years old, provided they comply with subsection 23.45.504.I;

7. Recycling collection stations;

8. Urban farms with planting area not more than 4,000 square feet. Urban farms with greater than 4,000 square feet of planting area may be allowed as an administrative conditional use to any use permitted outright or as a conditional use. The Director may grant, condition, or deny a conditional use permit in accordance with subsection 23.42.051.B; and

9. Accessory dwelling units provided they comply with Section 23.42.022.

D. ((~~Heat recovery incinerators may be permitted as accessory administrative conditional uses, pursuant to Section 23.45.506.~~)) Ground-floor commercial use in Lowrise zones without an RC suffix are allowed if they comply with the following:

1. The commercial use is located on a corner lot or on a lot that abuts both a street and an alley.

2. The commercial use is limited to the following:

a. Food processing and craft work;

b. General sales and services; and

c. Restaurants.

3. The commercial uses do not occupy more than 2,500 square feet of gross floor area.

4. The commercial use is permitted only on or below the ground floor of a structure.

5. Vents for venting of odors, vapors, smoke, gas and fumes, and exterior heat exchangers and other similar devices (e.g., related to ventilation, air conditioning, or refrigeration) shall be at least 10 feet above finished sidewalk grade and directed away to the extent possible from residential uses within 50 feet of the vent.

6. Drive-in businesses are prohibited as a principal or accessory use.

7. Outdoor sales of food or beverages must be located at least 50 feet from adjacent lots.

8. Outdoor service of food or beverages must be located at least 50 feet from adjacent lots.

9. Businesses may not be open between the hours of 10 p.m. and 6 a.m.

E. Ground-floor commercial use in Midrise and Highrise zones without an RC suffix are allowed if they comply with the following:

1. Drive-in businesses are prohibited((~~,~~)) as either a principal or accessory use.

2. ((~~The following uses are permitted as ground-floor commercial uses in MR and HR zones pursuant to Section 23.45.532:~~)) The commercial use is limited to the following:

a. Business support services;

b. Food processing and craft work;

c. General sales and services;

d. Medical services;

e. Offices;

f. Restaurants; and

g. Live-work units with one of the uses permitted in this subsection 23.45.504.E as the permitted commercial use.

3. The ground-floor commercial uses meet the requirements of Section 23.45.532.

F. Existing cemeteries are permitted to continue in use. New cemeteries are prohibited and existing cemeteries are prohibited from expanding. For purposes of this Section 23.45.504, a change in a cemetery boundary is not considered an expansion in size and is permitted provided that:

1. The change does not increase the net land area occupied by the cemetery;

2. The land being added to the cemetery is contiguous to the existing cemetery and is not separated from the existing cemetery by a public street or alley whether or not improved; and

3. The use of the land being added to the cemetery will not result in the loss of housing.

G. Except as provided in subsections 23.45.504.G.1 and 23.45.504.G.2 ((~~below~~)), medical service uses other than permitted ground-floor commercial uses are prohibited.

1. Medical service uses in HR zones may be permitted as administrative conditional uses pursuant to subsection 23.45.506.F.

2. Medical service uses meeting the development standards for institutions are permitted outright on property conveyed by a deed from the City that, at the time of conveyance, restricted the property's use to a health care or health-related facility.

H. Fences and free-standing walls of utility services uses shall be set back from the street lot line by an average of 7 feet and be no less than 5 feet from the street lot line at any point. Landscaping shall be provided between the fence or wall and the street lot line. The Director may reduce this setback after finding that the reduced setback will not significantly increase project impacts, including but not limited to noise, odor, and the scale of the structure in relation to nearby buildings. Acceptable methods to reduce fence or wall impacts include changes in the height, design, or construction of the fence or wall, including the use of materials, architectural detailing, artwork, vegetated trellises, decorative fencing, or similar features to provide visual interest facing the street lot line. Fences and walls may obstruct or allow views to the interior of a site. Where site dimensions and conditions allow, applicants are encouraged to provide both a landscaped setback between the fence or wall and the right-of-way, and a fence or wall that provides visual interest facing the street lot line, through the height, design, or construction of the fence or wall, including the use of materials, architectural detailing, artwork, vegetated trellises, decorative fencing, or similar features.

I. Bed and breakfast uses. A bed and breakfast use may be operated in a principal dwelling unit or an accessory dwelling unit under the following conditions:

1. The bed and breakfast use has a valid business license tax certificate issued by the Department of Finance and Administrative Services;

2. The bed and breakfast use is operated by the primary resident of the dwelling unit where the bed and breakfast is located or the resident operator; and

3. There is no evidence of a bed and breakfast use visible from the exterior of the dwelling unit other than a sign permitted by subsection 23.55.022.D.1.

Section 33. Section 23.45.508 of the Seattle Municipal Code, last amended by Ordinance 127098, is amended as follows:

23.45.508 General provisions

A. Except for structures related to an urban farm, a structure occupied by a permitted use other than a residential use may be partially or wholly converted to a residential use even if the structure does not conform to the development standards for residential uses in multifamily zones.

B. ((~~Off street parking shall be provided pursuant to Section 23.54.015, and as permitted by provisions of Sections 23.45.504 and 23.45.506, if applicable.~~

~~C.~~)) Expansions of nonconforming converted structures and conversions of structures occupied by nonconforming uses are regulated by Sections 23.42.108 and 23.42.110.

((~~D. Methods for measurements are provided in Chapter 23.86. Requirements for streets, alleys, and easements are provided in Chapter 23.53. Standards for parking and access and design are provided in Chapter 23.54. Standards for solid waste and recyclable materials storage space are provided in Section 23.54.040. Standards for signs are provided in Chapter 23.55.~~

~~E.~~)) C. Assisted living facilities, congregate residences, nursing homes, and structures containing ground floor commercial uses as allowed by Chapter 23.46 in RC zones shall meet the development standards for ((~~apartments~~)) stacked dwelling units unless otherwise specified.

((~~F. Single-family dwelling units. In LR zones, single-family dwelling units shall meet the development standards for townhouse developments, except as otherwise provided. In MR and HR zones, single-family dwelling units shall meet the development standards of the zone.~~

~~G. Proposed uses in all multifamily zones are subject to the transportation concurrency level-of-service standards prescribed in Chapter 23.52.~~

~~H.~~)) D. Lots with no street frontage. For purposes of structure width, depth, and setbacks, multifamily zoned lots that have no street frontage are subject to the following:

1. For lots that have only one alley lot line, the alley lot line shall be treated as a front lot line.

2. For lots that have more than one alley lot line, the Director shall determine which alley lot line shall be treated as the front lot line.

3. For lots that have no alley lot lines, the applicant may choose the front lot line provided that the selected front lot line length is at least 50 percent of the width of the lot.

((~~I.~~)) E. Any other provision of the Seattle Municipal Code notwithstanding, an applicant is not entitled to a permit for any use or development on a lot in an LR zone that would be inconsistent with any term, condition, or restriction contained either in any recorded agreement that is in effect as to that lot and was made in connection with a rezone of the lot to LDT, L1, L2, L3, or L4, or in any City Council decision or ordinance related to a rezone of the lot to LDT, L1, L2, L3, or L4 conditioned on a recorded agreement prior to April 19, 2011.

((~~J.~~)) F. If more than one category of residential use is located on a lot, and if different development standards apply to the different categories of use, then each category's percentage of the total limit imposed by the development standard shall be calculated based on each category's percentage of total structure footprint area, as follows:

1. Calculate the footprint, in square feet, for each category of residential use. For purposes of this calculation, "footprint" is defined as the horizontal area enclosed by the exterior walls of the structure.

2. Calculate the total square feet of footprint of all categories of residential uses on the lot.

3. Divide the square footage of the footprint for each category of residential structure in subsection ((~~23.45.508.J.1~~)) 23.45.508.F.1 by the total square feet of footprints of all residential uses in subsection ((~~23.45.508.J.2~~)) 23.45.508.F.2.

4. Multiply the percentage calculated in subsection ((~~23.45.508.J.3~~)) 23.45.508.F.3 for each housing category by the area of the lot. The result is the area of the lot devoted to each housing category.

5. The total limit for each category of residential use is the applicable limit for that use multiplied by the percentage calculated in subsection ((~~23.45.508.J.4~~)) 23.45.508.F.4.

((~~K.~~)) G. Unless otherwise specified, the development standards of each zone shall be applied in that zone, and may not be used in any other zone, except that if both zones have the same development standards, the development standard shall be applied to the lot as a whole. If a lot or development site includes more than one zoning designation and a development standard is based on lot area, the lot area used in applying the development standard shall be the portion of the contiguous area with the corresponding zoning designation.

Section 34. Section 23.45.510 of the Seattle Municipal Code, last amended by Ordinance 127099, is amended as follows:

23.45.510 Floor area

A. Gross floor area. In multifamily zones, gross floor area includes exterior corridors, breezeways, and stairways that provide building circulation and access to dwelling units or sleeping rooms. Balconies, patios, and decks that are associated with a single dwelling unit or

sleeping room and that are not used for common circulation((~~, and ground-level walking paths,~~)) are not considered gross floor area.

B. Floor area ratio (FAR) limits in LR and MR zones. FAR limits apply in LR and MR zones as shown in Table A for 23.45.510((-)), provided that if the LR zone designation includes an incentive zoning suffix, then gross floor area may exceed the base FAR as identified in the suffix designation, up to the limits shown in Table A for 23.45.510, if the applicant complies with Chapter 23.58A, Incentive Provisions. The applicable FAR limit applies to the total chargeable floor area of all structures on the lot.

Table A for 23.45.510
FAR limits in LR and MR zones

Zone	Zones with an MHA suffix	Zones without an MHA suffix
LR1	1.3, except 1.5 for stacked dwelling units	1.0
LR2	1.4, except 1.6 for stacked dwelling units [1]	1.1
LR3 outside urban centers and urban villages	1.8	1.2, except 1.3 for ((~~apartments~~)) stacked dwelling units
LR3 inside urban centers and urban villages	2.3	1.2, except 1.5 for ((~~apartments~~)) stacked dwelling units
MR	4.5	3.2

Footnote to Table A for 23.45.510
[1] Except that the FAR is ((~~1.6~~)) 1.8 for ((~~apartments~~)) stacked dwelling units that provide one or more outdoor amenity areas meeting the requirements of Section 23.45.522 and the following provisions are met:
1. The total amount of((~~,~~)) outdoor amenity area is equal to at least 35 percent of the lot area;

Table A for 23.45.510 FAR limits in LR and MR zones		
Zone	**Zones with an MHA suffix**	**Zones without an MHA suffix**
2. No part of such amenity area has a width or depth of less than 20 feet; and 3. The outdoor amenity area is located at ground level or within 4 feet of finished grade.		

* * *

D. The following floor area is exempt from FAR limits:

1. All stories, or portions of stories, that are underground.

2. The floor area in a Landmark structure subject to controls and incentives imposed by a designating ordinance, if the owner of the Landmark has executed and recorded an agreement acceptable in form and content to the Landmarks Preservation Board, providing for the restoration and maintenance of the historically significant features of the structure, except that this exemption does not apply to a lot from which a transfer of development potential (TDP) has been made under Chapter 23.58A, and does not apply for purposes of determining TDP available for transfer under Chapter 23.58A.

3. The floor area in structures built prior to January 1, 1982, as ((~~single-family~~)) detached dwelling units that will remain in residential use, regardless of the number of dwelling units within the existing structure, provided that:

a. ((~~All residential structures in LR zones, except as provided in subsection 23.45.510.D.4.b;~~)) No other principal structure is located between the existing residential structure and the street lot line along at least one street frontage. If the existing residential structure is moved on the lot, the floor area of the existing residential structure remains exempt if it continues to meet this subsection 23.45.510.D.3.a; and

b. ((~~Single family, cottage housing, rowhouse, and townhouse developments in LR zones, provided that all parking is located at the rear of the structure or is enclosed in structures with garage entrances located on the rear facade; and~~)) The exemption is limited to the gross floor area that existed on January 1, 1982 and does not include any additions to floor area made to the residential structure after January 1, 1982.

4. Portions of a story that extend no more than 4 feet above existing or finished grade, whichever is lower, excluding access, (see Exhibit A for 23.45.510), in the following circumstances:

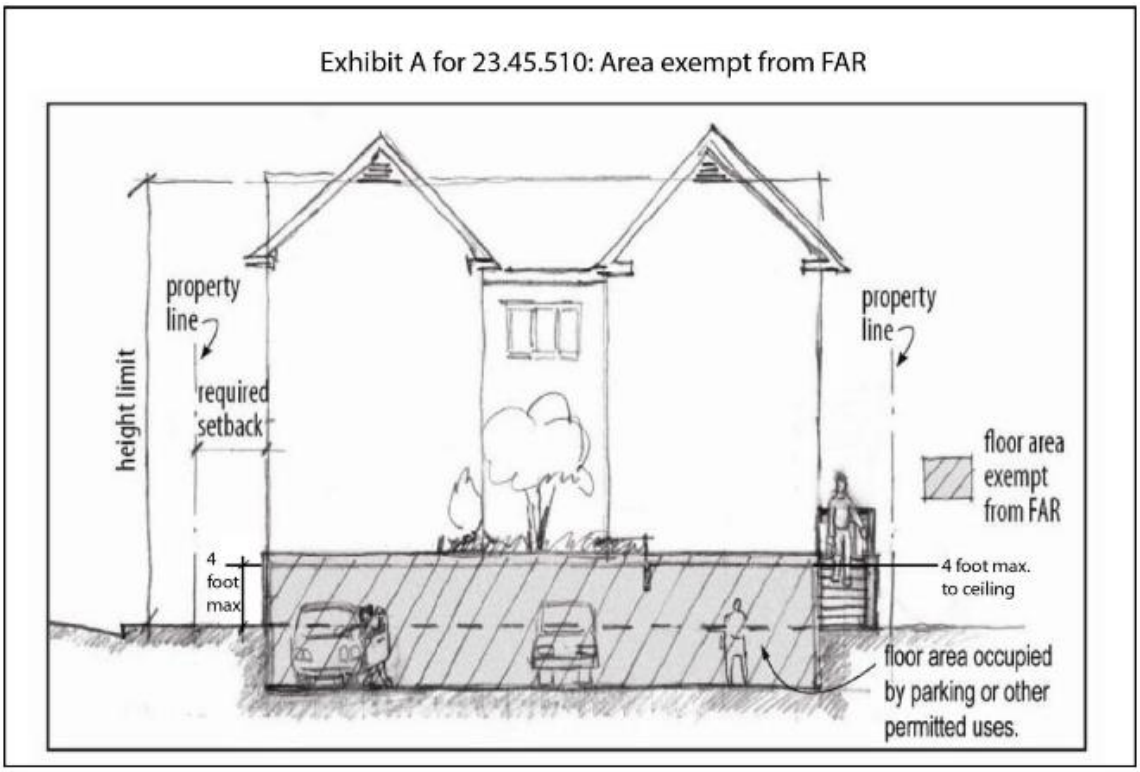
a. ((~~All residential structures~~)) Stacked dwelling units in LR zones ((~~except as provided in subsection 23.45.510.D.4.b~~));

b. ((S~~ingle family, cottage housing, rowhouse, and townhouse developments~~)) Attached and detached dwelling units in LR zones, provided that all parking is located at the rear of the structure or is enclosed in structures with garage entrances located on the rear facade; and

c. All ((~~multifamily structures~~)) dwelling units in MR and HR zones.

Exhibit A for 23.45.510

Area exempt from FAR



5. For ((~~rowhouse and townhouse developments and apartments~~)) attached and stacked dwelling units, floor area within a story, or portion of a story, that is partially above grade if all of the following conditions are met:

a. The story, or portion of the story, that is partially above grade is used for parking or other accessory uses and has no additional stories above;

b. The average height of the exterior walls enclosing the floor area does not exceed one story, measured from existing or finished grade, whichever is lower;

c. The roof area above the exempt floor area is predominantly flat, is used as amenity area, and meets the standards for amenity area at ground level in Section 23.45.522; and

d. At least 25 percent of the perimeter of the amenity area on the roof above the floor area is not enclosed by the walls of the structure.

6. Enclosed common amenity area in HR zones.

7. As an allowance for mechanical equipment, in any structure more than 85 feet in height, 3.5 percent of the gross floor area that is not otherwise exempt under this subsection 23.45.510.D.

8. In HR zones, ground floor commercial uses meeting the requirements of Section 23.45.532, if the street level of the structure containing the commercial uses has a minimum floor-to-floor height of 13 feet and a minimum depth of 15 feet.

9. The floor area of required bicycle parking for small efficiency dwelling units or congregate residence sleeping rooms, if the bicycle parking is located within the structure containing the small efficiency dwelling units or congregate residence sleeping rooms. Floor area of bicycle parking that is provided beyond the required bicycle parking is not exempt from FAR limits.

10. Common walls separating individual ((~~rowhouse and townhouse~~)) attached dwelling units.

11. In the Northgate Urban Center, up to 15,000 square feet of floor area in residential use in a structure built prior to 1990 that is located on a split-zoned lot of at least 40,000 square feet in size.

12. In MR and HR zones, all gross floor area in child care centers.

13. In low-income housing, all gross floor area for accessory human service uses.

E. If TDP is transferred from a lot pursuant to Section 23.58A.042, the amount of non-exempt floor area that may be permitted is ((~~an~~)) a FAR of 7, plus any net amount of TDP previously transferred to the lot, minus the sum of the existing non-exempt floor area on the lot and the amount of TDP transferred.

Section 35. Section 23.45.512 of the Seattle Municipal Code, last amended by Ordinance 127211, is repealed:

((~~23.45.512 Density limits and family-size unit requirements—LR zones~~

~~A. Density limits~~

~~1. Except according to subsection 23.45.512.A.4, the following developments must meet the density limits described in this subsection 23.45.512.A:~~

~~a. In LR1 zones, rowhouse development on interior lots and all townhouse development; and~~

~~b. All development in Lowrise zones that do not have a mandatory housing affordability suffix.~~

~~2. Development described in subsection 23.45.512.A.1 shall not exceed a density of one dwelling unit per 1,150 square feet of lot area, except that apartments in LR3 zones that do not have a mandatory housing affordability suffix shall not exceed a density limit of one dwelling unit per 800 square feet.~~

~~3. When density calculations result in a fraction of a unit, any fraction up to and including 0.85 constitutes zero additional units, and any fraction over 0.85 constitutes one additional unit.~~

~~4. Low-income housing shall have a maximum density of one dwelling unit per 400 square feet of lot area.~~

~~B. Family-sized unit requirements in LR1 zones~~

~~1. Apartment developments in LR1 zones with four or more units shall provide at least one unit with two or more bedrooms and a minimum net unit area of 850 square feet for every four units in the structure.~~

~~2. One unit with three or more bedrooms and a minimum net unit area of 1,050 square feet may be provided in place of any two units required to include two bedrooms and a minimum net unit area of 850 square feet.~~

~~C. Nursing homes, congregate housing, assisted living facilities, and accessory dwelling units that meet the standards of Section 23.45.545 are exempt from the density limit set in subsection 23.45.512.A and the requirements in subsection 23.45.512.B.~~

~~D. Dwelling unit(s) located in structures built prior to January 1, 1982, as single-family dwelling units that will remain in residential use are exempt from density limits.~~

~~E. If dedication of right-of-way is required, permitted density shall be calculated before the dedication is made.~~

~~F. Adding units to existing structures~~

~~1. One additional dwelling unit may be added to an existing residential structure regardless of the density restrictions in subsection 23.45.512.A and the requirements in subsection 23.45.512.B. An additional unit is allowed only if the proposed additional unit is to be located entirely within an existing structure, and no additional floor area to accommodate the new unit is proposed to be added to the existing structure.~~

~~2. For the purposes of this subsection 23.45.512.F, "existing residential structures" are those that were established under permit as of October 31, 2001, or for which a permit has been granted and the permit has not expired as of October 31, 2001.~~))

Section 36. Section 23.45.514 of the Seattle Municipal Code, last amended by Ordinance 127211, is amended as follows:

23.45.514 Structure height

A. Subject to the additions and exceptions allowed as set forth in this Section 23.45.514, the height limits for structures in LR zones are as shown on Table A for 23.45.514.

Table A for 23.45.514
Structure height for LR zones (in feet)

((~~Housing~~)) Dwelling unit type	**LR1**	**LR2**	**LR3 outside urban centers, urban villages, and Station Area Overlay Districts**	**LR3 in urban centers, urban villages, and Station Area Overlay Districts**
((~~Cottage housing developments~~	~~22~~	~~22~~	~~22~~	~~22~~
~~Rowhouse and townhouse developments~~)) Attached and detached dwelling units	((~~30~~)) 32	40 [1]	40 [1]	50 [1]
((~~Apartments~~)) Stacked dwelling units	((~~30~~)) 32	40 [1]	40 [1]	50 [2]

Footnotes for Table A for 23.45.514
[1] Except that the height limit is ((~~30~~)) 32 feet in zones without a mandatory housing affordability suffix.
[2] Except that the height limit is 40 feet in zones without a mandatory housing affordability suffix.

* * *

C. The height limit for accessory structures other than accessory dwelling units that are located in required setbacks or separations is 12 feet, except as follows:

1. Garages and carports are limited to 12 feet in height as measured on the facade containing the vehicle entrance. Open rails may extend an additional 3 feet above the

roof of the garage or carport if any portion of the roof is within 4 feet of existing grade. The ridge of a pitched roof on a garage located in a required setback may extend up to 3 feet above the 12-foot height limit. All parts of the roof above the height limit shall be pitched at a rate of not less than 4:12. No portion of a shed roof is permitted to extend beyond the 12-foot height limit.

2. ((~~The height limit for an accessory dwelling unit is provided in subsection 23.42.022.D.~~

~~3.~~)) Freestanding flagpoles and religious symbols for religious institutions are exempt from height controls((~~,~~)) except as regulated in Chapter 23.64, provided they are no closer to any lot line than 50 percent of their height above existing grade.

* * *

F. For ((~~apartments in LR2 zones, and for all residential uses in LR3~~)) stacked dwelling units in LR zones, the applicable height limit is increased 4 feet above the height shown on Table A for 23.45.514 for a structure that includes a story that is partially below-grade, provided that:

1. This height exception does not apply to portions of lots that are within 50 feet of a ((~~neighborhood residential~~)) Neighborhood Residential zone boundary line, unless the lot in the LR zone is separated from a ((~~neighborhood residential~~)) Neighborhood Residential zoned lot by a street;

2. The number of stories above the partially below-grade story is limited to four stories for residential uses with a 40-foot height limit and to five stories for residential uses with a 50-foot height limit;

3. On the street-facing facade(s) of the structure, the story above the partially below-grade story is at least 18 inches above the elevation of the street, except that this requirement may be waived to accommodate units accessible to the disabled or elderly, consistent with the Seattle Residential Code((~~, Chapter 3,~~)) or the Seattle Building Code((~~, Chapter 11~~)); and

4. The average height of the exterior walls of the portion of the story that is partially below-grade does not exceed 4 feet, measured from existing or finished grade, whichever is less.

* * *

Section 37. Section 23.45.518 of the Seattle Municipal Code, last amended by Ordinance 126685, is amended as follows:

23.45.518 Setbacks ((~~and separations~~))

A. LR zones

1. Required setbacks for the LR zones are <u>as</u> shown in Table A for 23.45.518 and subsection 23.45.518.A.2.

((~~Table A for 23.45.518~~ ~~Required setbacks in LR zones measured in feet~~				
~~All LR zones~~	**~~Category of residential use~~**			
~~Setback~~	**~~Cottage housing developments and single-family dwelling units~~**	**~~Rowhouse developments~~**	**~~Townhouse developments~~**	**~~Apartments~~**
~~Front~~	~~7 average; 5 minimum~~	~~5 minimum~~	~~7 average; 5 minimum~~	~~5 minimum~~

((Table A for 23.45.518
Required setbacks in LR zones measured in feet

All LR zones	**Category of residential use**			
Rear	0 with alley; 7 if no alley	0 with alley; With no alley: 7 average; 5 minimum	7 average; 5 minimum	10 minimum with alley; 15 minimum if no alley
Side setback for facades 40 feet or less in length [1]	5	0 where abutting another rowhouse development [2]; otherwise 3.5, except that on side lot lines that abut a neighborhood residential zone, the setback is 5	5	5
Side setback for facades greater than 40 feet in length [3]	5 minimum	0 where abutting another rowhouse development [2]; otherwise 3.5, except that on side lot lines that abut a neighborhood residential zone, the setback is 7 average; 5 minimum	7 average; 5 minimum	7 average; 5 minimum

Footnotes to Table A for 23.45.518

[1] Additions to existing nonconforming structures built prior to April 11, 2011, shall be set back a sufficient distance so that the addition complies with setback standards. For any portion of a structure built before April 11, 2011, the average setback applies only to a new addition built after that date. If an addition is to a side wall extended vertically, the existing side wall line may be continued by the addition, provided that the average setback of 7 feet or the 5-foot minimum setback is met.

[2] If the side facades of rowhouse developments on abutting lots are not joined, then a 3.5-foot setback is required, except the side setback may be reduced to zero if the abutting lot contains a rowhouse development and an easement is provided along the shared lot line of the abutting lot sufficient to leave a 3.5-foot separation between the principal structures of the abutting rowhouse developments.

[3] Portions of structures that qualify for the FAR exemption in subsection 23.45.510.D.5 are

((~~Table A for 23.45.518~~ ~~Required setbacks in LR zones measured in feet~~	
~~All LR zones~~	~~Category of residential use~~
~~not considered part of the facade length for the purposes of determining the side setback requirement.~~))	

Table A for 23.45.518 **Required setbacks in LR zones**	
Front	7 feet average, 5 feet minimum
Rear	If rear lot line abuts an alley, 0 feet Otherwise, 7 feet average, 5 feet minimum
Side	5 feet

2. Upper-level setbacks in LR2 and LR3 zones

a. An upper-level setback of 12 feet from the front lot line is required for all portions of a structure above the following height:

1) Forty-four feet for zones with a height limit of 40 feet; and

2) Fifty-four feet for zones with a height limit of 50 feet.

b. An upper-level setback of 12 feet from each side or rear lot line that abuts a lot zoned ((~~single-family~~)) Neighborhood Residential is required for all portions of the structure above 34 feet in height.

c. Projections allowed in subsection ((~~23.45.518.H~~)) 23.45.518.G are allowed in upper-level setbacks.

d. Structures allowed in subsection ((~~23.45.518.I~~)) 23.45.518.H are not allowed in upper-level setbacks.

e. Rooftop features are not allowed in upper-level setback except as follows:

1) A pitched roof, other than a shed roof or butterfly roof, is allowed in the upper-level setback if all parts of the roof are pitched at a rate of not less than 6:12 and not more than 12:12.

2) Open railings may extend up to 4 feet above the height at which the setback begins.

3) Parapets may extend up to 2 feet above the height at which the setback begins.

* * *

D. Through lots. In the case of a through lot, each setback abutting a street ((~~except a side setback~~)) shall be a front setback. Rear setback requirements shall not apply to the through lot.

E. Other setback requirements. Additional structure setbacks may be required in order to meet the provisions of Chapter 23.53((~~, Requirements for Streets, Alleys, and Easements~~)).

F. ((~~Separations between multiple structures~~

~~1. In LR and MR zones, the minimum required separation between principal structures at any two points on different interior facades is 10 feet, except for cottage housing developments, and principal structures separated by a driveway or parking aisle.~~

~~2. In LR and MR zones, if principal structures are separated by a driveway or parking aisle, the minimum required separation between the principal structures is 2 feet greater than the required width of the driveway or parking aisle, provided that the separation is not required to be any greater than 24 feet. If principal structures are separated by a driveway~~

~~or parking aisle, projections that enclose floor area may extend a maximum of 3 feet into the required separation if they are at least 8 feet above finished grade.~~

~~3. Cottage housing developments in LR and MR zones:~~

~~a. The minimum required separation between principal structures at any two points on different interior facades is 6 feet, unless there is a principal entrance on an interior facade, in which case the minimum separation required from that facade is 10 feet.~~

~~b. Facades of principal structures shall be separated from facades of accessory structures by a minimum of 3 feet.~~

~~G.~~)) Front and rear setbacks ((~~and all separations~~)) on lots containing certain environmentally critical areas or buffers may be reduced pursuant to Sections 25.09.280 and 25.09.300.

((~~H.~~)) G. Projections permitted in required setbacks ((~~and separations~~))

1. ((~~Cornices~~)) Architectural features such as cornices, eaves, gutters, roofs, fireplaces, chimneys, and other ((~~forms of weather protection~~)) similar features may project into required setbacks ((~~and separations~~)) a maximum of 4 feet if they are no closer than 3 feet to any lot line.

2. Garden windows and other similar features that do not provide floor area may project a maximum of 18 inches into required setbacks ((~~and separations~~)) if they:

a. Are a minimum of 30 inches above the finished floor;

b. Are no more than 6 feet in height and 8 feet wide; and

c. Combined with bay windows and other similar features with floor area, make up no more than 30 percent of the area of the facade.

3. Bay windows and other similar features that provide floor area may project a maximum of 2 feet into required setbacks ((~~and separations~~)) if they:

a. Are no closer than 5 feet to any lot line;

b. Are no more than 10 feet in width; and

c. Combined with garden windows and other ((~~features~~)) projections included in subsection ((~~23.45.518.H.2~~)) 23.45.518.G.2, make up no more than 30 percent of the area of the facade.

4. Unenclosed decks up to 18 inches above existing or finished grade, whichever is lower, may project into required setbacks ((~~or separations~~)).

5. Unenclosed porches or steps

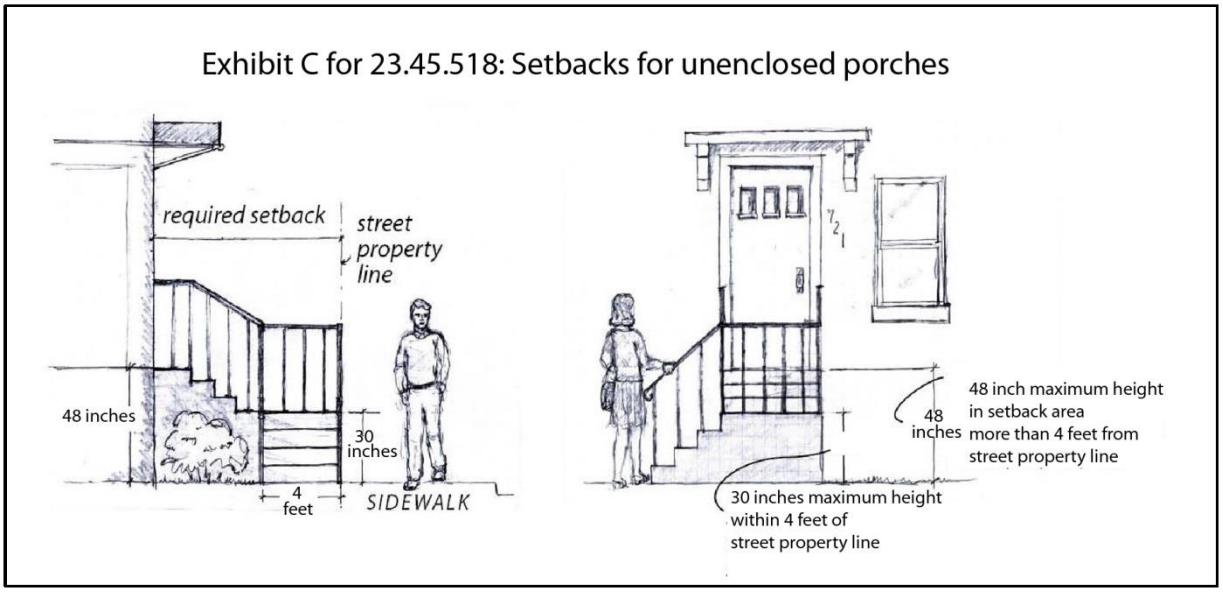
a. Unenclosed porches or steps no higher than 4 feet above existing grade, or the grade at the street lot line closest to the porch, whichever is lower, may extend to within 4 feet of a street lot line, except that portions of entry stairs or stoops not more than 2.5 feet in height from existing or finished grade, whichever is lower, ((~~excluding guard rails or hand rails,~~)) may extend to a street lot line. See Exhibit C for 23.45.518.

b. Unenclosed porches or steps no higher than 4 feet above existing grade may project into the required rear setback ((~~or required separation~~)) between structures a maximum of 4 feet provided they are a minimum of 5 feet from a rear lot line.

c. Unenclosed porches or steps permitted in required setbacks ((~~and separations~~)) shall be limited to a combined maximum width of 20 feet.

Exhibit C for 23.45.518

Setbacks for unenclosed porches



d. Permitted porches or steps may be covered, provided that no portions of the cover-structure, including any supports, are closer than 3 feet to any lot line.

6. Fireplaces and chimneys may project up to 18 inches into required setbacks ((~~or separations~~)).

7. Unenclosed decks and balconies may project a maximum of 4 feet into required setbacks if each one is:

a. No closer than 5 feet to any lot line;

b. No more than 20 feet wide; and

c. Separated from other decks and balconies on the same facade of the structure by a distance equal to at least 1/2 the width of the projection.

8. Mechanical equipment. Heat pumps and similar mechanical equipment, not including incinerators, are permitted in required setbacks if they comply with the requirements of Chapter 25.08. Any heat pump or similar equipment shall not be located within 3 feet of any

lot line. Charging devices for electric cars are considered mechanical equipment and are permitted in required setbacks if not located within 3 feet of any lot line.

((~~I.~~)) H. Structures in required setbacks ((~~or separations~~)), except upper-level setbacks

1. Detached garages, carports, or other accessory structures that are not accessory dwelling units are allowed in ((~~required separations and~~)) required rear or side setbacks, subject to the following requirements:

a. Any accessory structure located between a principal structure and a side lot line shall provide the setback required for the principal structure;

b. Any portion of an accessory structure located more than 25 feet from a rear lot line shall be set back at least 5 feet from the side lot line;

c. Accessory structures shall be set back at least 7 feet from any lot line that abuts a street; and

d. Accessory structures shall be separated by at least 3 feet from all principal structures, including the eaves, gutters, and other projecting features of the principal structure.

2. Ramps or other devices necessary for access for the disabled and elderly that meet the Seattle Residential Code((~~, Chapter 3,~~)) or Seattle Building Code((~~, Chapter 11, Accessibility,~~)) are allowed in any required setback ((~~or separation~~)).

3. Uncovered, unenclosed pedestrian bridges, necessary for access and 5 feet or less in width, are allowed in any required setback ((~~or separation~~)).

4. Underground structures are allowed in any required setback ((~~or separation~~)).

5. Solar collectors are allowed in any required setback ((~~or separation~~)), pursuant to the provisions of Section 23.45.545.

6. Freestanding signs, bike racks, and similar unenclosed structures that are 6 feet or less in height above existing or finished grade, whichever is lower, are allowed in any required setback ((~~or separation~~)), provided that signs meet the provisions of Chapter 23.55((~~, Signs~~)).

7. Fences

a. Fences no greater than 6 feet in height are allowed in any required setback ((~~or separation~~)), except that fences in the required front setback extended to side lot lines or in street side setbacks extended to the front and rear lot lines may not exceed 4 feet in height. Fences located on top of a bulkhead or retaining wall are also limited to 4 feet. If a fence is placed on top of a new bulkhead or retaining wall used to raise grade, the maximum combined height is limited to 9.5 feet.

b. Up to 2 feet of additional height for architectural features such as arbors or trellises on the top of a fence is allowed((~~,~~)) if the architectural features are predominately open.

c. Fence height may be averaged along sloping grades for each 6-foot-long segment of the fence, but in no case may any portion of the fence exceed 8 feet in height when the height allowed by subsection ((~~23.45.518.I.7.a~~)) 23.45.518.H.7.a is 6 feet, or 6 feet in height when the height allowed by subsection ((~~23.45.518.I.7.a~~)) 23.45.518.H.7.a is 4 feet.

8. Bulkheads and retaining walls

a. Bulkheads and retaining walls used to raise grade are allowed in any required setback if they are limited to 6 feet in height, measured above existing grade. ((~~A guardrail no higher than 42 inches may be placed on top of a bulkhead or retaining wall existing as of January 3, 1997.~~))

b. Bulkheads and retaining walls used to protect a cut into existing grade may not exceed the minimum height necessary to support the cut or 6 feet measured from the finished grade on the low side, whichever is greater. ((~~If the bulkhead is measured from the low side and it exceeds 6 feet, an open guardrail of no more than 42 inches meeting Seattle Residential Code or Seattle Building Code requirements may be placed on top of the bulkhead or retaining wall.~~)) Any fence shall be set back a minimum of 3 feet from such a bulkhead or retaining wall.

((~~9. Arbors are allowed in any required setback or separation under the following conditions:~~

~~a. In each required setback or separation, an arbor may be erected with no more than a 40-square-foot footprint, measured on a horizontal roof plane inclusive of eaves, to a maximum height of 8 feet. At least 50 percent of both the sides and the roof of the arbor shall be open, or, if latticework is used, there shall be a minimum opening of 2 inches between crosspieces.~~

~~b. In each required setback abutting a street, an arbor over a private pedestrian walkway with no more than a 30-square-foot footprint, measured on the horizontal roof plane and inclusive of eaves, may be erected to a maximum height of 8 feet. At least 50 percent of the sides of the arbor shall be open, or, if latticework is used, there shall be a minimum opening of 2 inches between crosspieces.~~

~~10. Above-grade green stormwater infrastructure (GSI) features are allowed in any required setback or separation if:~~

~~a. Each above-grade GSI feature is no more than 4.5 feet tall, excluding piping;~~

~~b. Each above-grade GSI feature is no more than 4 feet wide; and~~

~~c. The total storage capacity of all above-grade GSI features is no greater than 600 gallons.~~

~~11. Above-grade GSI features larger than what is allowed in subsection 23.45.518.I.10 are allowed in any required setback or separation if:~~

~~a. Above-grade GSI features do not exceed ten percent coverage of any one setback or separation area;~~

~~b. No portion of an above-grade GSI feature is located closer than 2.5 feet from a side lot line; and~~

~~c. No portion of an above-grade GSI feature projects more than 5 feet into a front or rear setback area.~~))

9. Guardrails or handrails that are no more than 42 inches in height are allowed on unenclosed stairs, decks, access bridges, bulkheads, and retaining walls.

10. Above-grade stormwater management features, such as bioretention planters and cisterns, are allowed in setbacks if:

a. No feature, excluding piping, is more than:

1) Twelve feet tall if located in a portion of the rear setback that is not also a side setback; or

2) Six and one half feet tall, if located in other setbacks;

b. No feature greater than 4.5 feet tall is located within 10 feet of the front lot line, excluding piping, unless it is integrated into a bulkhead or retaining wall that is allowed in subsection 23.45.518.H.8;

c. No feature greater than 6 inches tall is located within 2.5 feet of the side lot line; and

d. The total storage capacity of all above-grade cisterns is no greater than 1,250 gallons.

((~~12.~~)) 11. Mechanical equipment. Heat pumps and similar mechanical equipment, not including incinerators, are allowed in any required setback if they comply with the requirements of Chapter 25.08. No heat pump or similar equipment shall be located within 3 feet of any lot line. Charging devices for electric cars are considered mechanical equipment and are allowed in any required setbacks if not located within 3 feet of any lot line.

((~~13.~~)) 12. Detached, unenclosed structures accessory to ((~~townhouses~~)) attached or detached dwelling units that are up to 8 feet in height and used exclusively for bike parking are allowed in any required setback ((~~or separation~~)).

((~~14. Detached structures accessory to townhouses that are up to 10 feet in height and used exclusively for bike parking are allowed in required separations.~~))

13. Private, permanent swimming pools, hot tubs, and other similar uses are permitted in any required setback, provided that:

a. No part of any swimming pools, hot tubs, and other similar uses projects more than 18 inches above existing grade in a required front setback; and

b. No swimming pool is placed closer than 5 feet to any front or side lot line.

((~~J.~~)) I. Exceptions for existing ((~~single-family~~)) structures. ((~~1.~~)) In all multifamily zones, certain additions to a ((~~single-family dwelling unit~~)) residential structure may extend into a required side setback if the structure is already nonconforming with respect to that

setback, and if the presently nonconforming section is at least 60 percent of the total width of the respective facade of the structure prior to the addition. The line formed by the nonconforming wall of the structure shall be the limit to which any additions may be built, which may extend up to the height limit and may include basement additions (Exhibit D for 23.45.518), provided that additions shall be at least 3 feet from the side lot line.

((~~2. An existing single-family dwelling unit in a LR zone may be converted to a multifamily use without conforming to setback standards for apartments in subsection 23.45.518.A, provided that the building envelope is not changed. For the purposes of this subsection 23.45.518.J.2, "existing single-family dwelling unit" is one that was established under permit as of October 31, 2001, or for which a permit has been granted and the permit has not expired on October 31, 2001.~~))

Exhibit D for 23.45.518

Permitted additions into required setbacks for existing ((~~single-family dwelling units~~)) <u>structures</u>

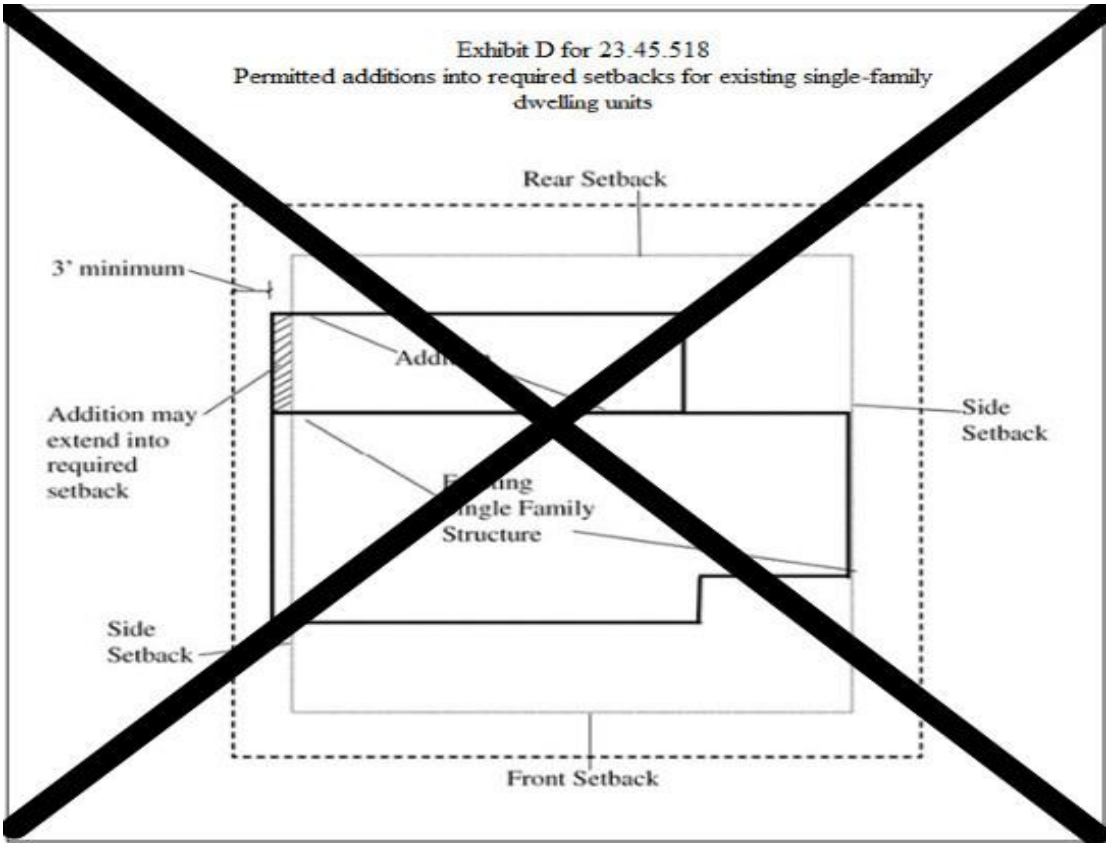


Exhibit D for 23.45.518
Permitted additions into required setbacks for existing single-family dwelling units
Rear Setback
3' minimum
Addition may extend into required setback
Side Setback
Existing Single Family Structure
Side Setback
Front Setback

1

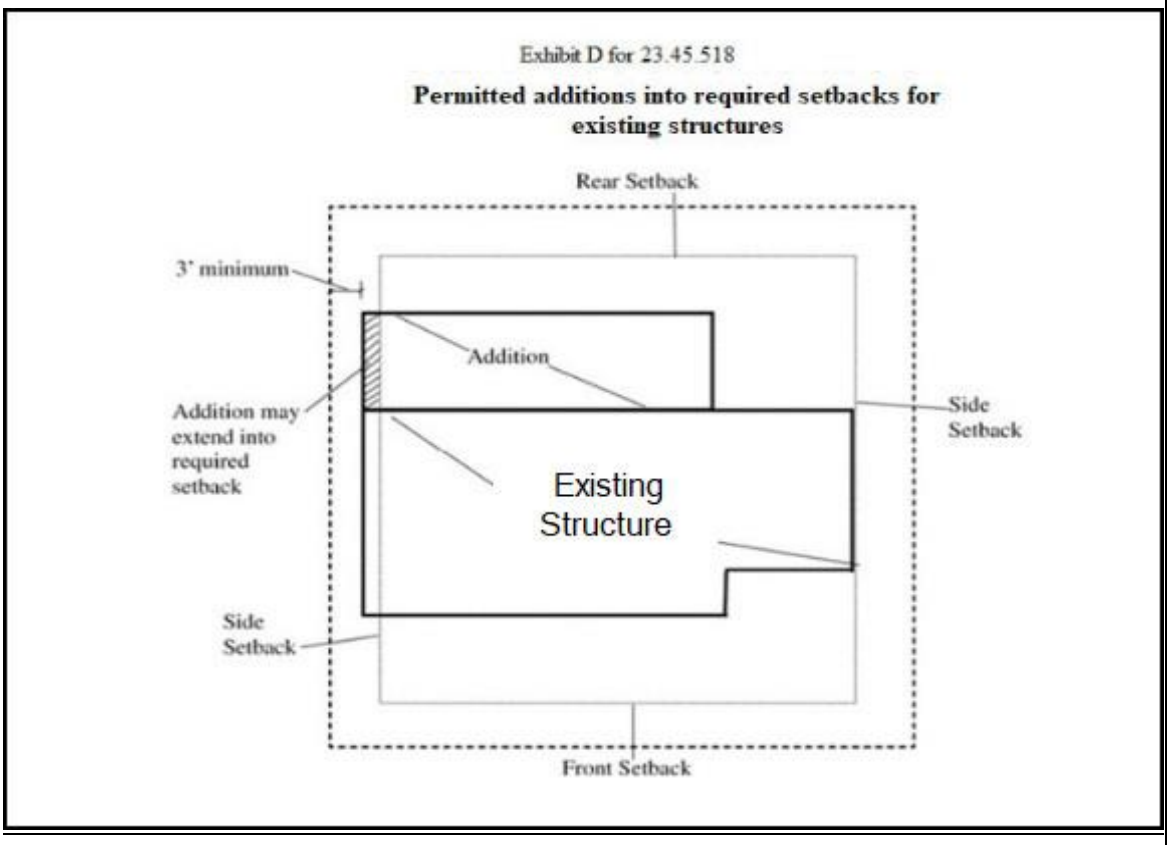


Exhibit D for 23.45.518
Permitted additions into required setbacks for existing structures
Rear Setback
3' minimum
Addition
Addition may extend into required setback
Side Setback
Existing Structure
Side Setback
Front Setback

2

Section 38. A new Section 23.45.519 is added to the Seattle Municipal Code as follows:

23.45.519 Separations between structures

A. In LR and MR zones, the minimum required separation between structures containing floor area is 6 feet except that, if the structures are separated by a driveway or parking aisle, the minimum required separation between structures containing floor area is 2 feet greater than the required width of the driveway or parking aisle or 24 feet, whichever is less. If the structures are separated by a driveway or parking aisle, projections that enclose floor area may extend a maximum of 3 feet into the required separation if they are at least 8 feet above finished grade.

B. Architectural features such as cornices, eaves, gutters, roofs, fireplaces, chimneys, and other forms of weather protection may project into required separations a maximum of 2 feet. Unenclosed structures allowed in side setbacks are allowed in the minimum separation. Garden windows, bay windows, covered porches and patios, balconies, and enclosed structures are not allowed in the required separation. Detached structures that are up to 10 feet in height and used exclusively for bike parking are allowed in required separations.

Section 39. Section 23.45.522 of the Seattle Municipal Code, last amended by Ordinance 126157, is amended as follows:

23.45.522 Amenity area

A. Amount of amenity area ((~~required for rowhouse and townhouse developments and apartments in LR zones~~))

1. The ((~~required~~)) amount of <u>required</u> amenity area ((~~for rowhouse and townhouse developments and apartments~~)) in LR zones is equal to ((~~25~~)) <u>20</u> percent of the lot area.

((~~2. A minimum of 50 percent of the required amenity area shall be provided at ground level, except that amenity area provided on the roof of a structure that meets the provisions of subsection 23.45.510.D.5 may be counted as amenity area provided at ground level.~~

~~3. For rowhouse and townhouse developments, amenity area required at ground level may be provided as either private or common space.~~

~~4. For apartments, amenity area required at ground level shall be provided as common space.~~

~~B. Amenity area requirements for cottage housing developments in all multi-family zones~~

~~1. A minimum of 300 square feet of amenity area is required for each cottage.~~

~~2. A minimum of 150 square feet of amenity area is required for each carriage house.~~

~~3. The required quantity shall be allocated as follows:~~

~~a. Half of the amenity area required for each cottage, and all of the amenity area required for each carriage house, shall be provided as common amenity area; and~~

~~b. Half of the amenity area required for each cottage shall be provided as private amenity area for that unit.~~

~~4. The required common amenity area may be divided into no more than two separate areas and shall:~~

~~a. have cottages or carriage houses abutting on at least two sides;~~

~~b. be in a location central to the cottage housing development; and~~

~~c. have no horizontal dimension of less than 10 feet.~~

~~5. Carriage houses shall have stairs that provide access to the common amenity area.~~

~~C. Amount of amenity area required in MR and HR zones.~~)) 2. The ((~~required~~)) amount of required amenity area in MR and HR zones is equal to ((~~5~~)) five percent of the total gross floor area of a residential structure. ((~~in residential use, except that cottage housing developments shall meet the standards in subsection 23.45.522.B.~~

~~D. General requirements. Required amenity areas shall meet the following conditions:~~

~~1. All units~~)) B. Attached and detached dwelling units shall have access to either a common or private amenity area. Stacked dwelling units shall have access to a common amenity area.

C. In LR zones, a minimum of 50 percent of the required amenity area shall be provided at ground level or within 4 feet of existing grade. Amenity area used to meet the requirements of this subsection 23.45.522.C may not be covered by any projections that provide floor area.

((~~2.~~)) D. Enclosed amenity areas

((~~a. In LR zones, an amenity area shall not be enclosed within a structure.~~

~~b. In MR and HR zones, except for cottage housing, no~~)) 1. No more than 50 percent of the amenity area may be enclosed, and this enclosed area shall be provided as common amenity area.

2. Enclosed amenity areas must be provided in a room used exclusively for this purpose or in an area on the ground floor that can be accessed directly from the building lobby or an outdoor amenity space and does not include any of the following:

a. Internal circulation hallways between outside doors and elevators or stairs;

b. Mailrooms;

c. Bike parking;

d. Solid waste and recyclable materials storage; and

e. Laundry facilities.

((~~3. Projections into amenity areas. Structural projections that do not provide floor area, such as garden windows, may extend up to 2 feet into an amenity area if they are at least 8 feet above finished grade.~~))

E. Amenity area size

((~~4.~~)) 1. Private amenity areas. ((~~a. There is no minimum dimension for private amenity areas, except that if a private amenity area is located between the structure and a side lot line that is not a side street lot line, the minimum horizontal dimension shall be measured from the side lot line and is required to be a minimum of 10 feet.~~

~~b. An unenclosed porch that is a minimum of 60 square feet in size and that faces a street or a common amenity area may be counted as part of the private amenity area for the rowhouse, townhouse, or cottage to which it is attached.~~)) Each private amenity area shall be at least 60 square feet in area and have a minimum width and depth of 6 feet.

((~~5.~~)) 2. Common amenity areas. ((~~for rowhouse and townhouse developments and apartments shall meet the following conditions: a. No~~)) Each common amenity area shall be ((~~less than~~)) at least 250 square feet ((~~in area, and common amenity areas shall~~)) and have a minimum ((~~horizontal dimension~~)) width and depth of 10 feet.

((~~b. Common amenity areas shall be improved as follows:~~

~~1) At least 50 percent of a common amenity area provided at ground level shall be landscaped with grass, ground cover, bushes, bioretention facilities, and/or trees.~~

~~2) Elements that enhance the usability and livability of the space for residents, such as seating, outdoor lighting, weather protection, art, or other similar features, shall be provided.~~

~~c. The common amenity area required at ground level for apartments shall be accessible to all apartment units.~~

~~6. Parking areas, vehicular access easements, and driveways do not qualify as amenity areas, except that a woonerf may provide a maximum of 50 percent of the amenity area if the design of the woonerf is approved through a design review process pursuant to Chapter 23.41.~~

~~7. Swimming pools, spas, and hot tubs may be counted toward meeting the amenity area requirement.~~

~~8. Rooftop areas excluded because they are near minor communication utilities and accessory communication devices, pursuant to subsection 23.57.011.C.1, do not qualify as amenity areas.~~))

F. Features in amenity areas

1. The following features are not allowed in amenity areas:

a. Vehicular parking areas, vehicular access easements, and driveways;

b. Required bike parking;

c. Solid waste and recyclable material storage area; and

d. Enclosed structures.

2. Pathways serving multiple dwelling units are not allowed in private amenity areas.

3. Decks, porches, and steps; swimming pools, spas, and hot tubs; stormwater management features, including but not limited to bioretention planters and cisterns; play equipment; and similar features are allowed in amenity areas.

4. Amenity areas may be covered by weather protection.

5. Projections that do not provide floor area may extend into an amenity area if they meet the standards for projections into setbacks in subsection 23.45.518.G and if garden windows and other similar features are at least 8 feet above finished grade.

6. Rooftop areas located within 8 feet of minor communication utilities and accessory communication devices do not qualify as amenity areas.

G. Common amenity areas shall be improved as follows:

1. At least 35 percent of a common amenity area provided at ground level shall be landscaped with grass, ground cover, bushes, bioretention facilities, and/or trees.

2. Elements that enhance the usability and livability of the space for residents, such as seating, outdoor lighting, weather protection, art, or other similar features, shall be provided.

H. Areas in environmentally critical areas and their buffers, including but not limited to steep slopes, may count toward amenity areas. No amenity area enhancement elements shall be placed in the environmentally critical areas and their buffers non disturbance area.

((~~E.~~)) I. No amenity area is required for ((~~a~~)) one dwelling unit added to a ((~~single-family dwelling unit~~)) residential structure existing as of January 1, 1982, ((~~or for one new~~

~~dwelling unit added to a multifamily residential use existing as of October 10, 2001~~)) provided that no dwelling units have been added since that date.

Section 40. Section 23.45.527 of the Seattle Municipal Code, last amended by Ordinance 126509, is amended as follows:

23.45.527 Structure width ((~~and façade length~~)) limits in LR zones

((~~A.~~)) Structure width ((~~in LR zones~~)) for buildings containing residential uses may not exceed ((~~the width indicated on Table A for 23.45.527~~)) 90 feet in LR1 and LR2 zones and 150 feet in LR3 zones.

((~~Table A for 23.45.527: Maximum Structure Width in LR zones in feet~~

~~Zone~~	**~~Width in feet by Category of Residential Use~~**		
	~~Cottage Housing and Rowhouse Developments~~	**~~Townhouse Developments~~**	**~~Apartments~~**
~~LR1~~	~~No limit~~	~~60~~	~~45~~
~~LR2~~	~~No limit~~	~~90~~	~~90~~
~~LR3 outside Urban Villages, Urban Centers or Station Area Overlay Districts~~	~~No limit~~	~~120~~	~~120~~
~~LR3 inside Urban Villages, Urban Centers or Station Area Overlay Districts~~	~~No limit~~	~~150~~	~~150~~

~~B. Maximum façade length in Lowrise zones.~~

~~1. The maximum combined length of all portions of façades within 15 feet of a lot line that is neither a rear lot line nor a street or alley lot line shall not exceed 65 percent of the length of that lot line, except as specified in subsection 23.45.527.B.2.~~

~~2. For a rowhouse development on a lot that abuts the side lot line of a lot in a neighborhood residential zone, the maximum combined length of all portions of façades within 15 feet of the abutting side lot line is 40 feet.~~))

Section 41. Section 23.45.529 of the Seattle Municipal Code, last amended by Ordinance 127099, is amended as follows:

23.45.529 Design standards

((~~A. Intent. The intent of the design standards in this Section 23.45.529 is to:~~

~~1. Enhance street-facing and side facades to provide visual interest, promote new development that contributes to an attractive streetscape, and avoid the appearance of blank walls along a street or adjacent residential property;~~

~~2. Foster a sense of community by integrating new pedestrian-oriented multifamily development with the neighborhood street environment and promoting designs that allow easy surveillance of the street by area residents;~~

~~3. Promote livability in multifamily areas by providing a sense of openness and access to light and air; and~~

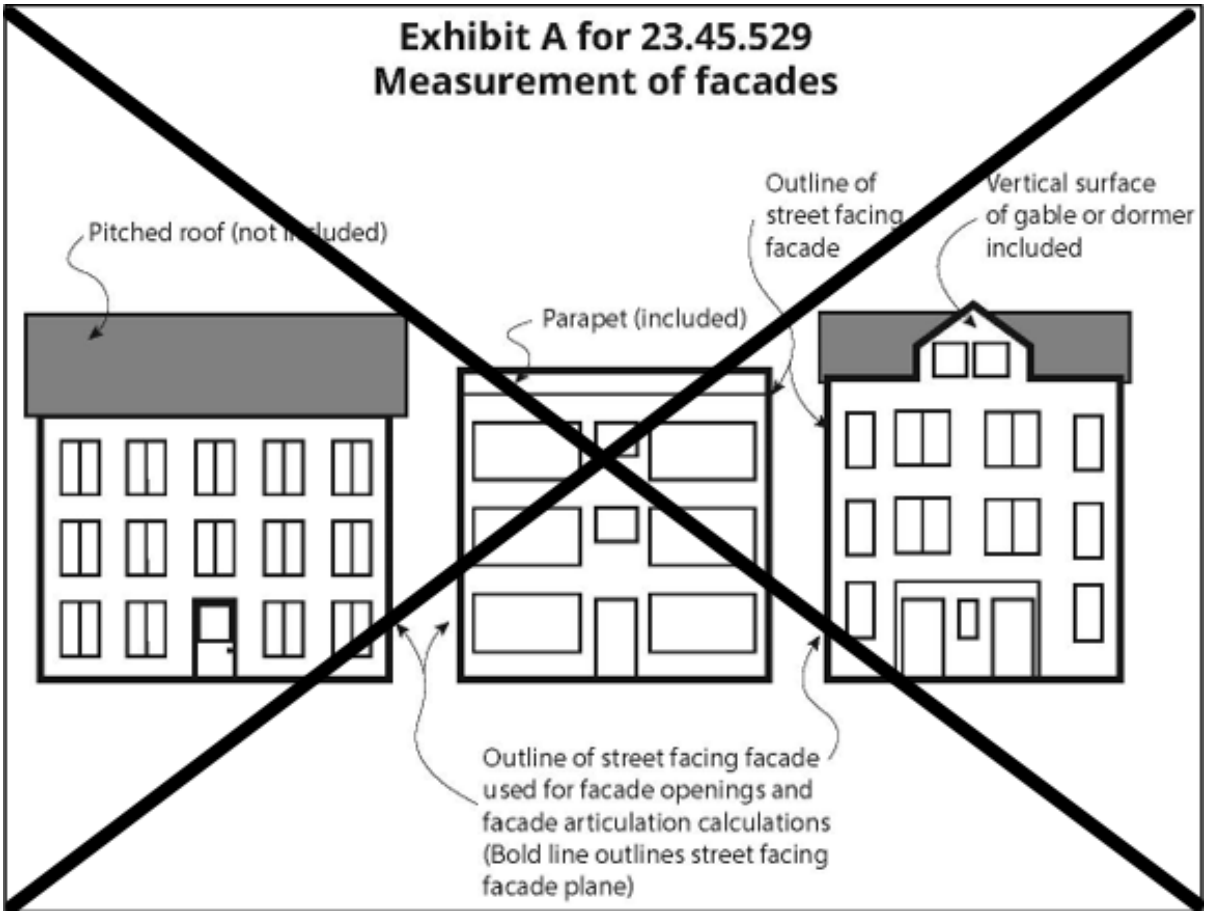
~~4. Encourage the compatibility of a variety of housing types with the scale and character of neighborhoods where new multifamily development occurs.~~

~~B. Application of provisions. The provisions of this Section 23.45.529 apply to all residential uses that do not undergo any type of design review pursuant to Chapter 23.41, except single-family dwelling units.~~

~~C. Treatment of street-facing facades. For the purposes of this subsection 23.45.529.C, a street-facing facade includes all vertical surfaces enclosing interior space, including gables and dormers, as shown in Exhibit A for 23.45.529.~~

Exhibit A for 23.45.529

Measurement of facades



1. Facade openings

a. At least 20 percent of the area of each street-facing facade shall consist of windows and/or doors, except as provided in subsection 23.45.529.C.1.b. If a front and side facade are street-facing, the two facades may be combined for the purpose of this calculation.

b. For any rowhouse or townhouse dwelling unit that has both a front and a side facade that are street-facing, the percentage of the side street-facing facade required to consist of windows and/or doors is reduced to ten percent for the portion of the facade associated with that dwelling unit. This reduction to ten percent is not allowed if the facades

~~are combined for the purpose of this standard pursuant to subsection 23.45.529.C.1.a or if any of the exceptions in subsection 23.45.529.C.3 are applied.~~

~~c. Windows count toward the requirement for facade openings in this subsection 23.45.529.C.1 only if they are transparent. Windows composed of glass blocks or opaque glass, garage doors, and doors to utility and service areas do not count.~~

~~2. Facade articulation~~

~~a. If a street-facing facade or portion of a street-facing facade is not vertical, the Director shall determine whether the facade is substantially vertical and required to comply with this subsection 23.45.529.C.~~

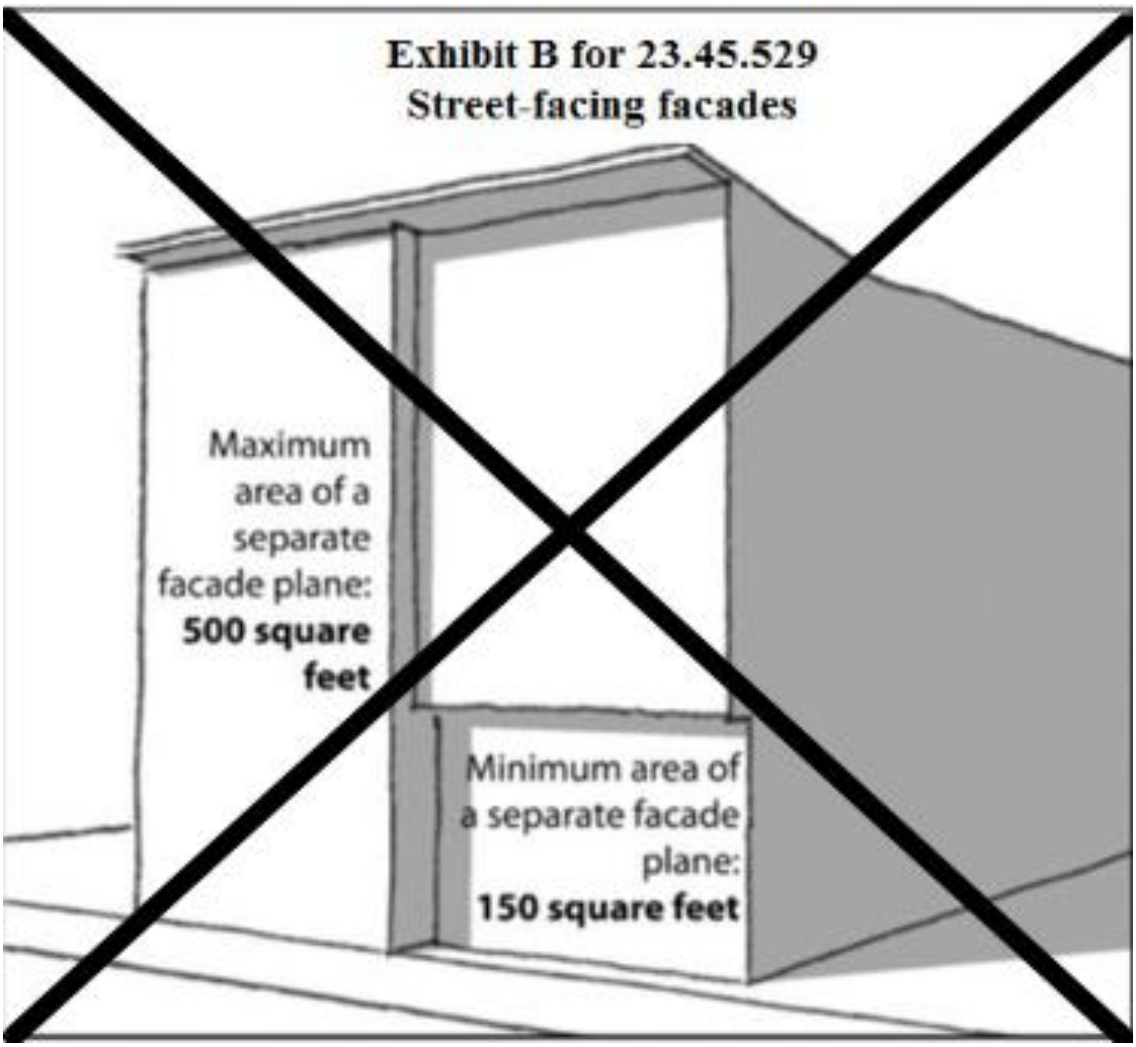
~~b. If the street-facing facade of a structure exceeds 750 square feet in area, division of the facade into separate facade planes is required (see Exhibit B for 23.45.529).~~

~~c. In order to be considered a separate facade plane for the purposes of this subsection 23.45.529.C.2, a portion of the street-facing facade shall have a minimum area of 150 square feet and a maximum area of 500 square feet, and shall project or be recessed from abutting facade planes by a minimum depth of 18 inches.~~

~~d. Trim that is a minimum of 0.75 inches deep and 3.5 inches wide is required to mark roof lines, porches, windows, and doors on all street-facing facades.~~

~~**Exhibit B for 23.45.529**~~

~~**Street-facing facades**~~



~~3. The Director may allow exceptions to the facade opening requirements in subsection 23.45.529.C.1 and the facade articulation requirements in subsection 23.45.529.C.2, if the Director determines that the street-facing facade will meet the intent of subsection 23.45.529.A.1 for all housing types, and, as applicable, the intent of subsections 23.45.529.E.2, 23.45.529.F.3, and 23.45.529.G.4 for cottage housing developments, rowhouse developments, and townhouse developments, respectively, through one or more of the following street-facing facade treatments:~~

~~a. Variations in building materials and/or color, or both, that reflect the stacking of stories or reinforce the articulation of the facade;~~

~~b. Incorporation of architectural features that add interest and dimension to the facade, such as porches, bay windows, chimneys, pilasters, columns, cornices, and/or balconies;~~

~~c. Special landscaping elements provided to meet Green Factor requirements pursuant to Section 23.45.524, such as trellises, that accommodate vegetated walls covering a minimum of 25 percent of the facade surface;~~

~~d. Special fenestration treatment, including an increase in the percentage of windows and doors to at least 25 percent of the street-facing facade(s).~~

~~D. Treatment of side facades that are not street-facing. For the purposes of this subsection 23.45.529.D, a side facade that is not street-facing includes all vertical surfaces enclosing interior space, including gables and dormers, as shown in Exhibit A for 23.45.529, if located within 10 feet of a side lot line.~~

~~1. If the side facade of a structure that is not street-facing exceeds 1,000 square feet in area, one of the following must be met:~~

~~a. A portion of the side facade with a minimum area of 250 square feet and a maximum area of 750 square feet shall project or be recessed from abutting facade planes by a minimum depth of 18 inches; or~~

~~b. The side facade shall include vertical or horizontal variations in building materials or color, covering a minimum of 25 percent of the facade surface.~~

~~2. Structures shall be designed to maintain the privacy of dwelling units by minimizing placement of proposed windows where they would directly align with windows on~~

~~the side facade of a structure on an abutting lot located within 20 feet of the side property line or by use of fencing, screening, landscaping, or translucent windows to create privacy between buildings.~~

~~E. Design standards for cottage housing developments~~

~~1. Pedestrian entry. Each cottage with a street-facing facade that is located within 10 feet of the street lot line shall have a visually prominent pedestrian entry through the use of covered stoops, porches, or other architectural entry features. For cottages on corner lots that have more than one street-facing facade within 10 feet of the street lot line, a visually prominent pedestrian entry is required on only one of the street-facing facades. Access to these entrances may be through a required private amenity area that abuts the street.~~

~~2. Architectural expression. Cottage housing developments shall include architectural details that reduce the visual scale of the units. Each cottage shall employ one or more of the following design techniques to reduce visual scale of the units:~~

~~a. Attached covered porch;~~

~~b. Roofline features such as dormers or clerestories;~~

~~c. Bay windows;~~

~~d. Variation in siding texture and materials; and~~

~~e. Other appropriate architectural techniques demonstrated by the applicant to reduce the visual scale of cottages.~~

~~F. Design standards for rowhouse developments~~

~~1. Pedestrian entry. Each rowhouse unit shall have a pedestrian entry on the street-facing facade that is designed to be visually prominent through the use of covered~~

~~stoops, porches, or other architectural entry features. For rowhouse units on corner lots, a visually prominent pedestrian entry is required on only one of the street-facing facades.~~

~~2. Front setback. Design elements to provide a transition between the street and the rowhouse units, such as landscaping, trees, fences, or other similar features, are required in the front setback.~~

~~3. Architectural expression. The street-facing facade of a rowhouse unit shall provide architectural detail or composition to visually identify each individual rowhouse unit as seen from the street. Design elements such as trim or molding, modulation, massing, color and material variation, or other similar features may be used to achieve visual identification of individual units. Rooftop features, such as dormers or clerestories, or roofline variation may be used to visually identify individual rowhouse units.~~

~~C. Design standards for townhouse developments~~

~~1. Building orientation. Townhouse developments shall maximize the orientation of individual units to the street by complying with one of the following conditions:~~

~~a. When multiple buildings are located on a lot, at least 50 percent of the townhouse units shall be located so that there is no intervening principal structure between the unit and the street, unless the intervening principal structure was established under permit as of October 31, 2001, or was granted a permit on October 31, 2001, and the permit has not expired; or~~

~~b. All townhouse units without a street-facing facade shall have direct access to a common amenity area meeting the requirements of Section 23.45.522 that either abuts the street or is visible and accessible from the street by a clear pedestrian pathway.~~

~~2. Pedestrian pathway. A clear pedestrian pathway from the street to the entrance of each townhouse unit shall be provided. The pedestrian pathway may be part of a driveway, provided that the pathway is differentiated from the driveway by pavement color, texture, or similar technique. Signage identifying townhouse unit addresses and the directions to the unit entrance(s) from the street shall be provided.~~

~~3. Pedestrian entry. Each townhouse unit with a street-facing facade shall have a pedestrian entry on the street-facing facade that is designed to be a visually prominent feature through the use of covered stoops, porches, or other architectural entry features. For townhouse units on corner lots, a visually prominent pedestrian entry is required on only one of the street-facing facades.~~

~~4. Architectural expression. Architectural detail or composition shall be provided to visually identify each individual townhouse unit, as seen from the public street. Design elements such as trim or molding, modulation, massing, color and material variation, or other similar features may be used to achieve visual identification of individual units. Rooftop features, such as dormers or clerestories, or roofline variation may be used to visually identify individual townhouse units.~~

~~H. Building entry orientation standards for apartments~~

~~1. For each apartment structure, a principal shared pedestrian entrance is required that faces either a street or a common amenity area, such as a landscaped courtyard, that abuts and has direct access to the street. Additional pedestrian entrances to individual units are permitted.~~

~~2. If more than one apartment structure is located on a lot, each apartment structure separated from the street by another principal structure shall have a principal entrance that is accessible from a common amenity area with access to the street.~~

~~3. The shared entrance of each apartment structure shall have a pedestrian entry that is designed to be visually prominent, through the use of covered stoops, overhead weather protection, a recessed entry, or other architectural entry features.~~))

A. Application of provisions

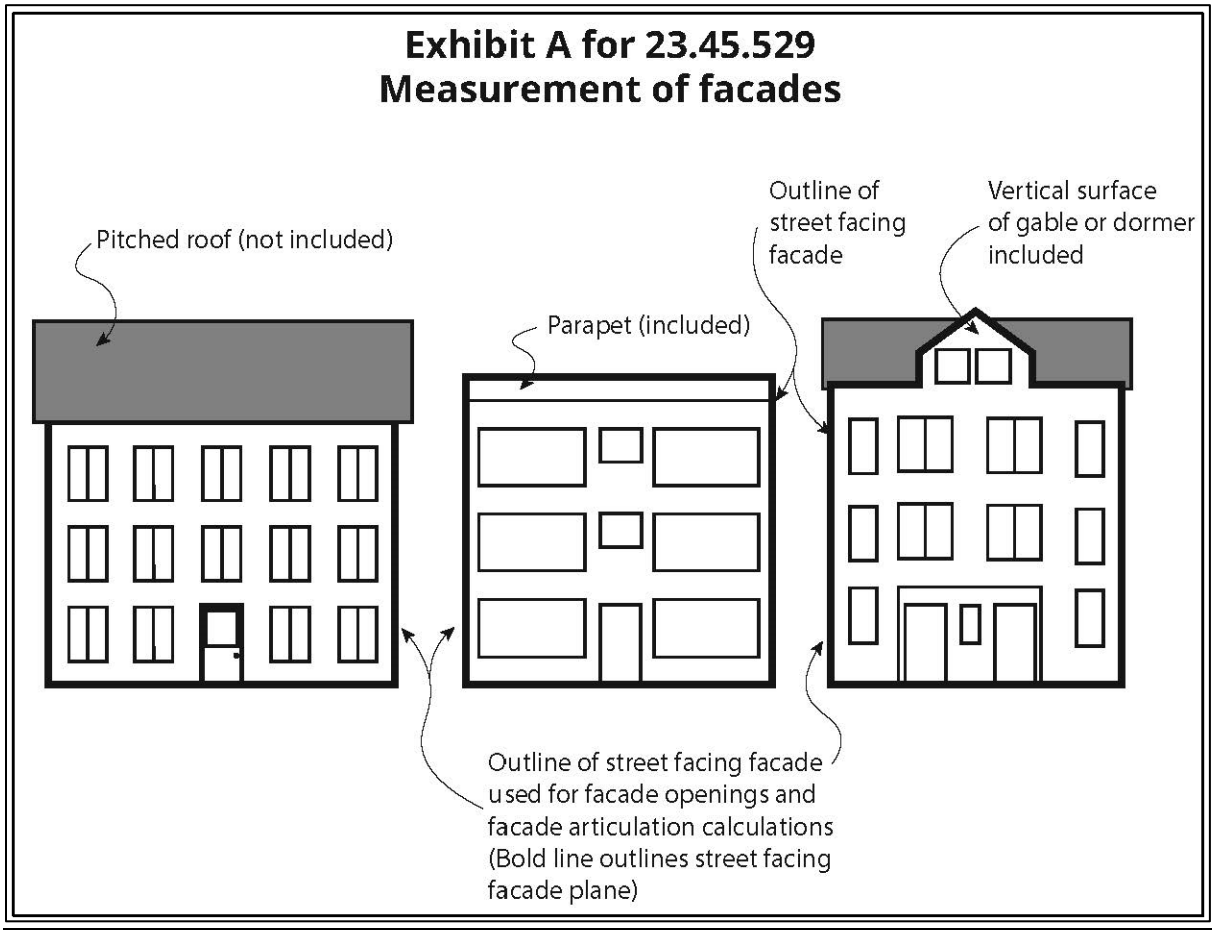
1. The provisions of this Section 23.45.529 apply to development that includes the construction of new dwelling units, except for new dwelling units added within existing structures.

2. For the purposes of this Section 23.45.529, requirements for street-facing facades shall only apply to structures located within 40 feet of a street lot line or a vehicle access easement serving ten or more residential units. For structures located within 40 feet of a vehicle access easement serving ten or more residential units but not within 40 feet of street lot line, the facade that faces the vehicle access easement shall be considered a street-facing facade for the purpose of this Section 23.45.529. If multiple facades face vehicle access easements, the applicant may decide which facade facing a vehicle access easement is considered the street-facing facade.

B. Measurement of street-facing facades. For the purposes of this Section 23.45.529, a street-facing facade includes all vertical surfaces enclosing interior space, including gables and dormers, as shown in Exhibit A for 23.45.529.

Exhibit A for 23.45.529

Measurement of facades



C. Pedestrian access. Each dwelling unit shall have pedestrian access at least 3 feet in width to the sidewalk or, if no sidewalk exists, the front lot line. This pedestrian access may be shared or private. This pedestrian access may cross any required setbacks or interior separation. This pedestrian access may be part of a driveway.

D. Entrances. Each structure with a street-facing facade shall have a pedestrian entry on that street-facing facade meeting the requirements of subsections 23.44.140.D.1 through 23.44.140.D.4. For attached and detached dwelling units, the pedestrian entry may be located on a wall perpendicular to the street-facing facade provided that the pedestrian entry abuts a covered porch or recessed entry that also abuts the street-facing facade.

1. For stacked dwelling units, at least one pedestrian entry shall be required for the structure as a whole.

2. For attached and detached dwelling units, each individual dwelling unit with a street-facing facade within 40 feet of the street lot line shall have at least one pedestrian entry on the street-facing facade.

3. For structures or dwelling units with multiple street-facing facades, a pedestrian entry is required on only one of the street-facing facades.

4. Required pedestrian entry on street-facing facades shall have weather protection, such as a covered porch, canopy, recessed entry, or similar feature, measuring at least 3 feet by 3 feet in width and depth for attached and detached dwelling units and at least 6 feet in width and 4 feet in depth for stacked dwelling units.

E. Windows and doors. At least 20 percent of the area of each street-facing facade shall consist of windows and/or doors. If front and side facades are street-facing, the two facades shall be combined for the purpose of this calculation. Windows count toward the requirement for facade openings in this subsection 23.45.529.E only if they are transparent. Windows composed of garage doors and doors to utility and service areas do not count. For the purpose of this Section 23.45.529, a window shall include the glass pane, window frame, and internal components such as sashes, mullions, grilles, muntins, and stiles.

Section 42. Section 23.45.531 of the Seattle Municipal Code, enacted by Ordinance 123495, is repealed:

((~~23.45.531 Development standards for cottage housing developments and carriage house structures~~

~~A. Size limit for dwelling units.~~

~~1. The maximum gross floor area of each cottage in a cottage housing development is 950 square feet.~~

~~2. The maximum gross floor area of a carriage house is 600 square feet.~~

~~B. Size limit for garages. The maximum gross floor area for a shared garage structure in a cottage housing development is 1,200 square feet, and the garage shall contain no more than four parking spaces.~~

~~C. Carriage house structures. A carriage house structure is permitted in a cottage housing development subject to the following standards:~~

~~1. The maximum number of dwelling units permitted in carriage house structures is one-third of the total number of units in the cottage housing development on the lot.~~

~~2. The maximum gross floor area of the ground floor of a carriage house structure is 1,200 square feet.~~

~~D. Existing single-family dwelling units in a cottage housing development. Existing single-family dwelling units that are non-conforming with respect to the standards for a cottage housing development are permitted to remain, provided that the extent of the nonconformity shall not be increased.~~))

Section 43. Section 23.45.536 of the Seattle Municipal Code, last amended by Ordinance 126682, is amended as follows:

23.45.536 Parking location, access, and screening

* * *

D. Screening of parking

1. Parking shall be screened from direct street view by:

a. The street-facing facade of a structure;

b. Garage doors;

c. A fence or wall; or

d. Landscaped areas, including bioretention facilities or landscaped berms.

2. Screening provided by a fence, wall, or vegetation in a landscaped area shall not be located within any required sight triangle and shall meet the following conditions:

a. The fence, wall, or vegetation in the landscaped area shall be at least 3 feet tall measured from the elevation of the curb, or from the elevation of the street if no curb is present. If the elevation of the ground at the base of the fence, wall, or landscaped area is higher than the finished elevation of the parking surface, the difference in elevation may be measured as a portion of the required height of the screen, so long as the fence, wall, or vegetation in the landscaped area is at least 3 feet in height. If located in a setback, the fence or wall shall meet the requirements of subsection ((~~23.45.518.I.7~~)) 23.45.518.H.7.

b. The fence, wall, or vegetation in the landscaped area shall be set back at least 3 feet from the lot line.

3. Screening by garage doors in LR zones. If parking is provided in a garage in or attached to a principal structure and garage door(s) face a street, the garage door(s) may be no more than 75 square feet in area.

* * *

Section 44. Section 23.45.545 of the Seattle Municipal Code, last amended by Ordinance 127211, is amended as follows:

23.45.545 Standards for ((~~certain accessory uses~~)) solar collectors

A. ((~~Private, permanent swimming pools, hot tubs and other similar uses are permitted in any required setback, provided that:~~

~~1. No part of any swimming pools, hot tubs and other similar uses shall project more than 18 inches above existing grade in a required front setback; and~~

~~2. No swimming pool shall be placed closer than 5 feet to any front or side lot line.~~

~~B. Solar greenhouses, greenhouses and solariums~~

~~1. Solar greenhouses, greenhouses and solariums, in each case that are attached to and integrated with the principal structure and no more than 12 feet in height are permitted in a required rear setback, subject to subsection 23.45.545.B.3, and may extend a maximum of 6 feet into required front and side setbacks, subject to subsection 23.45.545.B.2.~~

~~2. An attached solar greenhouse, greenhouse or solarium, in a required setback, shall be no closer than 3 feet from side lot lines and 8 feet from front lot lines.~~

~~3. A solar greenhouse, greenhouse or solarium allowed pursuant to subsection 23.45.545.B.1 shall not be closer than 5 feet to the rear lot line, except that it may abut an alley if it is no taller than 10 feet along the rear lot line, is of no greater average height than 12 feet for a depth of 15 feet from the rear lot line, and is no wider than 50 percent of lot width for a depth of 15 feet from the rear lot line.~~

~~C. Solar~~)) General standards for solar collectors

1. Solar collectors are permitted in required setbacks, subject to the following:

a. Detached solar collectors are permitted in required rear setbacks, no closer than 5 feet to any other principal or accessory structure.

b. Detached solar collectors are permitted in required side setbacks, no closer than 5 feet to any other principal or accessory structure, and no closer than 3 feet to the side lot line.

2. Sunshades that provide shade for solar collectors that meet minimum written energy conservation standards administered by the Director may project into southern front or rear setbacks. Those that begin at 8 feet or more above finished grade may be no closer than 3 feet from the lot line. Sunshades that are between finished grade and 8 feet above finished grade may be no closer than 5 feet to the lot line.

3. Solar collectors on roofs. Solar collectors that are located on a roof are permitted as follows:

a. In LR zones up to 4 feet above the maximum height limit or 4 feet above the height of stair or elevator penthouse(s), whichever is higher; and

b. In MR and HR zones up to 10 feet above the maximum height limit or 10 feet above the height of stair or elevator penthouse(s), whichever is higher.

c. If the solar collectors would cause an existing structure to become nonconforming, or increase an existing nonconformity, the Director may permit the solar collectors as a special exception pursuant to Chapter 23.76. Solar collectors may be permitted under this subsection ((~~23.45.545.C.3.c~~)) 23.45.545.A.3.c even if the structure exceeds the height limits established in this subsection ((~~23.45.545.C.3~~)) 23.45.545.A.3, if the following conditions are met:

1) There is no feasible alternative solution to placing the collector(s) on the roof; and

2) The collector(s) are located so as to minimize view blockage from surrounding properties and the shading of property to the north, while still providing adequate solar access for the solar collectors.

((~~D. [Reserved.]~~

~~E. Nonconforming solar collectors.~~)) B. Special exceptions. The Director may permit the installation of solar collectors that meet minimum energy standards and that increase an existing nonconformity as a special exception pursuant to Chapter 23.76. Such an installation may be permitted even if it exceeds the height limits established in this Section 23.45.545 and Section 23.45.514 when the following conditions are met:

1. There is no feasible alternative solution to placing the collector(s) on the roof; and

2. Such collector(s) are located so as to minimize view blockage from surrounding properties and the shading of property to the north, while still providing adequate solar access for the solar collectors.

((~~F. Open wet moorage facilities for residential uses are permitted as an accessory use pursuant to Chapter 23.60A, Shoreline District, if only one slip per residential unit is provided.~~

~~G. Bed and breakfast uses. A bed and breakfast use may be operated under the following conditions:~~

~~1. The bed and breakfast use has a valid business license tax certificate issued by the Department of Finance and Administrative Services;~~

~~2. All operators of bed and breakfast uses who use a short-term rental platform for listing the bed and breakfast shall have a valid short-term rental operator's license issued by the Department of Finance and Administrative Services.~~

~~3. The bed and breakfast use shall be operated by the primary resident of the dwelling unit where the bed and breakfast is located or the resident operator;~~

~~4. There shall be no evidence of a bed and breakfast use visible from the exterior of the dwelling unit other than a sign permitted by subsection 23.55.022.D.1; and~~

~~5. A bed and breakfast use may be located in a dwelling unit or an accessory dwelling unit.~~

~~H. Heat recovery incinerators, located on the same lot as the principal use, may be permitted by the Director as accessory administrative conditional uses, pursuant to Section 23.45.506.~~

~~I. Accessory dwelling units are allowed pursuant to Section 23.42.022.~~

~~J. Urban farms are subject to the standards in Section 23.42.051 and the conditional use requirement in subsection 23.45.504.C.8.~~))

Section 45. Section 23.45.550 of the Seattle Municipal Code, last amended by Ordinance 126855, is amended as follows:

23.45.550 Alternative ((~~Standards~~)) <u>standards</u> for development of ((~~affordable~~)) <u>low-income</u> units ((~~on property owned or controlled by a religious organization~~))

((~~In lieu of meeting development standards contained in subsections 23.45.510.B and 23.45.510.C (floor area), subsections 23.45.512.A and 23.45.512.B (density), and subsections 23.45.514.A and 23.45.514.B (height), a proposed development that meets the requirements of Section 23.42.055 may elect to meet the alternative development standards in this Section 23.45.550.~~))

<u>A. Development on a lot that meets the requirements of Section 23.42.055 may elect to meet the development standards in subsections 23.45.550.B and 23.45.550.C in lieu of the</u>

standards in subsection 23.45.510.C (floor area) and subsections 23.45.514.A and 23.45.514.B (height).

((~~A.~~)) B. Floor area

1. Development permitted pursuant to Section 23.42.055 is subject to the FAR limits as shown in Table A for 23.45.550.

Table A for 23.45.550
FAR limits for development permitted pursuant to Section 23.42.055

Zone	Base FAR	Maximum additional exempt FAR [1]
LR1	1.5 [2]	0.3
LR2	((~~1.8~~)) 2.0	0.3
LR3 outside urban centers and urban villages	2.5	0.5
LR3 inside urban centers and urban villages	3.25	0.5
MR	5.0	0.5
HR	16	1.0

Footnotes to Table A for 23.45.550
[1] Gross floor area for uses listed in subsection 23.45.550.B.2 are exempt from FAR calculations up to this amount.
[2] Except that lots in LR1 zones that have previously been zoned RSL have a base FAR of 2.7.

2. In addition to the FAR exemptions in subsection 23.45.510.D, an additional FAR exemption up to the total amount specified in Table A for 23.45.550 is allowed for any combination of the following floor area:

a. Floor area in units with two or more bedrooms and a minimum net unit area of 850 square feet;

b. Floor area of a religious facility; ((~~and~~))

c. Floor area in a structure designated as a Landmark pursuant to Chapter 25.12; and/or

d. Any floor area in a development located within ((~~1/4 mile (1,320 feet) of a transit stop or station served by a frequent transit route as defined in subsection 23.54.015.B.4~~)) a frequent transit service area.

3. Split-zoned lots

a. On lots located in two or more zones, the FAR limit for the entire lot shall be the highest FAR limit of all zones in which the lot is located, provided that:

1) At least 65 percent of the total lot area is in the zone with the highest FAR limit;

2) No portion of the lot is located in a ((~~neighborhood residential~~)) Neighborhood Residential zone; and

3) A minimum setback of 10 feet applies for any lot line that abuts a lot in a ((~~neighborhood residential~~)) Neighborhood Residential zone.

b. For the purposes of this subsection ((~~23.45.550.A.3~~)) 23.45.550.B.3, the calculation of the percentage of a lot or lots located in two or more zones may include lots that abut and are in the same ownership at the time of the permit application.

((~~B.~~)) C. Maximum height

1. Development permitted pursuant to Section 23.42.055 is subject to the height limits as shown in Table B for 23.45.550.

Table B for 23.45.550 Structure height for development permitted pursuant to Section 23.42.055	
Zone	**Height limit (in feet)**
LR1	((~~40~~)) 50
LR2	50
LR3 outside urban centers and urban villages	55
LR3 inside urban centers and urban villages	65
MR	95
HR	480

2. Split-zoned lots

a. On lots located in two or more zones, the height limit for the entire lot shall be the highest height limit of all zones in which the lot is located, provided that:

1) At least 65 percent of the total lot area is in the zone with the highest height limit;

2) No portion of the lot is located in a ((~~neighborhood residential~~)) Neighborhood Residential zone; and

3) A minimum setback of 10 feet applies for any lot line that abuts a lot in a ((~~neighborhood residential~~)) Neighborhood Residential zone.

b. For the purposes of this subsection ((~~23.45.550.B.2~~)) 23.45.550.C.2, the calculation of the percentage of a lot or lots located in two or more zones may include lots that abut and are in the same ownership at the time of the permit application.

((~~C. Density limits. Development permitted pursuant to this Section 23.45.550 is not subject to the standards of subsections 23.45.512.A and 23.45.512.B.~~))

Section 46. Table A for Section 23.47A.004 of the Seattle Municipal Code, which section was last amended by Ordinance 127099, is amended as follows:

23.47A.004 Permitted and prohibited uses

* * *

Table A for 23.47A.004 **Uses in ((~~Commercial~~)) commercial zones**					
	Permitted and prohibited uses by zone [1]				
Uses	**NC1**	**NC2**	**NC3**	**C1**	**C2**
* * *					
E. ((~~INSTITUTIONS~~)) HUMAN SERVICE AND INSTITUTIONAL USES					
E.1. ((~~Institutions~~)) Human service and institutional uses not listed below	10	25	P	P	P
E.2. Major institutions subject to the provisions of Chapter 23.69	P	P	P	P	P
E.3. Religious facilities	P	P	P	P	P
E.4. Schools, elementary or secondary	P	P	P	P	P
E.5. Child care centers	P	P	P	P	P
* * *					
I. PUBLIC FACILITIES					
I.1. Jails					
I.1.a. Youth ((~~Service Centers~~)) service centers	X	X	P [13]	X	X
I.1.b. All other jails	X	X	X	X	X

Table A for 23.47A.004
Uses in ((~~Commercial~~)) commercial zones

	Permitted and prohibited uses by zone [1]				
Uses	**NC1**	**NC2**	**NC3**	**C1**	**C2**
I.2. Work-release centers	CCU-10	CCU-25	CCU	CCU	CCU
J. RESIDENTIAL USES [14]	P	P	P	P	CU [15]
((~~J.1. Residential uses not listed below~~	~~P~~	~~P~~	~~P~~	~~P~~	~~CU~~ [15]
~~J.2. Caretaker's quarters~~	~~P~~	~~P~~	~~P~~	~~P~~	~~P~~
~~J.3. Congregate residence~~	~~P~~	~~P~~	~~P~~	~~P~~	~~CU~~ [15]
~~J.4. Low-income housing~~	~~P~~	~~P~~	~~P~~	~~P~~	~~P~~))

* * *

((~~KEY~~)) Key to Table A for 23.47A.004
A = Permitted as an accessory use only
CU = Administrative ((~~Conditional Use~~)) conditional use (business establishment limited to the multiple of 1,000 square feet of any number following a hyphen, pursuant to Section 23.47A.010)
CCU = Council ((~~Conditional Use~~)) conditional use (business establishment limited to the multiple of 1,000 square feet of any number following a hyphen, pursuant to Section 23.47A.010)
P = Permitted
S = Permitted in shoreline areas only
X = Prohibited
CU-25 = Conditionally permitted; use is limited to 25,000 square feet, pursuant to Section 23.47A.010
10 = Permitted, business establishments limited to 10,000 square feet, pursuant to Section 23.47A.010
20 = Permitted, business establishments limited to 20,000 square feet, pursuant to Section 23.47A.010
25 = Permitted, business establishments limited to 25,000 square feet, pursuant to Section 23.47A.010
35 = Permitted, business establishments limited to 35,000 square feet, pursuant to Section 23.47A.010
40 = Permitted, business establishments limited to 40,000 square feet, pursuant to Section

Table A for 23.47A.004
Uses in ((~~Commercial~~)) <u>commercial</u> zones

	Permitted and prohibited uses by zone [1]				
Uses	**NC1**	**NC2**	**NC3**	**C1**	**C2**
23.47A.010 50 = Permitted, business establishments limited to 50,000 square feet, pursuant to Section 23.47A.010					

Footnotes to Table A for 23.47A.004

[1] In pedestrian-designated zones, a portion of the street-level street-facing facade of a structure along a designated principal pedestrian street may be limited to certain uses as provided in subsection 23.47A.005.D. In pedestrian-designated zones, drive-in lanes are prohibited (Section 23.47A.028).

[2] In addition to the provisions in this Chapter 23.47A, uses that entail major cannabis activity are subject to the requirements of Section 23.42.058.

[3] For commercial uses with drive-in lanes, see Section 23.47A.028.

[4] Subject to subsection 23.47A.004.H.

[5] Permitted at Seattle Center.

[6] Bed and breakfasts in existing structures are permitted outright with no maximum size limit.

[7] Medical services over 10,000 square feet within 2,500 feet of a medical Major Institution Overlay boundary require conditional use approval, unless they are included in a Major Institution Master Plan or dedicated to veterinary services.

[8] Medical service uses that are located in an urban center or urban village, which are in operation at such location before August 1, 2015, and that routinely provide medical services on a reduced fee basis to individuals or families having incomes at or below 200 percent of the poverty guidelines updated periodically in the Federal Register by the U.S. Department of Health and Human Services under the authority of 42 USC 9902(2), are limited to 20,000 square feet. This provision does not apply to medical service uses that are subject to a Major Institution Master Plan.

[9] Office uses in C1 and C2 zones are permitted up to the greater of 1 FAR or 35,000 square feet as provided in subsection 23.47A.010.D. Office uses in C1 and C2 zones are permitted outright with no maximum size limit if they meet the standards identified in subsection 23.47A.010.D.

[10] Gas stations and other businesses with drive-in lanes are not permitted in pedestrian-designated zones (Section 23.47A.028). Elsewhere in NC zones, establishing a gas station may require a demonstration regarding impacts under Section 23.47A.028.

[11] Grocery stores meeting the conditions of subsection 23.47A.010.E are permitted up to 23,000 square feet in size.

[12] Subject to subsection 23.47A.004.G.

[13] Permitted pursuant to subsection 23.47A.004.D.7.

[14] Residential uses may be limited to 20 percent of a street-level street-facing facade

Table A for 23.47A.004
Uses in ((~~Commercial~~)) commercial zones

	Permitted and prohibited uses by zone [1]				
Uses	**NC1**	**NC2**	**NC3**	**C1**	**C2**

pursuant to subsection 23.47A.005.C.

[15] Residential uses are conditional uses in C2 zones ((~~under~~)) subject to subsection 23.47A.006.A.3, except that low-income housing is allowed outright or as otherwise provided ((~~above in Table A for 23.47A.004 or~~)) in subsection 23.47A.006.A.3.

[16] Permitted at Seattle Center; see Section 23.47A.011.

[17] Flexible-use parking is subject to Section 23.54.026. In pedestrian-designated zones, surface parking is prohibited adjacent to principal pedestrian streets pursuant to subsection 23.47A.032.B.2.

[18] Permitted as surface parking only on surface parking lots existing as of January 1, 2017. In pedestrian-designated zones, surface parking is prohibited adjacent to principal pedestrian streets pursuant to subsection 23.47A.032.B.2.

[19] Permitted outright, except prohibited in ((~~the~~)) a SAOD.

[20] See Chapter 23.57, Communications regulations, for regulation of communication utilities.

[21] A recycling use that is located on the same development site as a solid waste transfer station may be permitted by administrative conditional use, subject to the requirements of subsection 23.47A.006.A.7.

Section 47. Section 23.47A.009 of the Seattle Municipal Code, last amended by Ordinance 126862, is amended as follows:

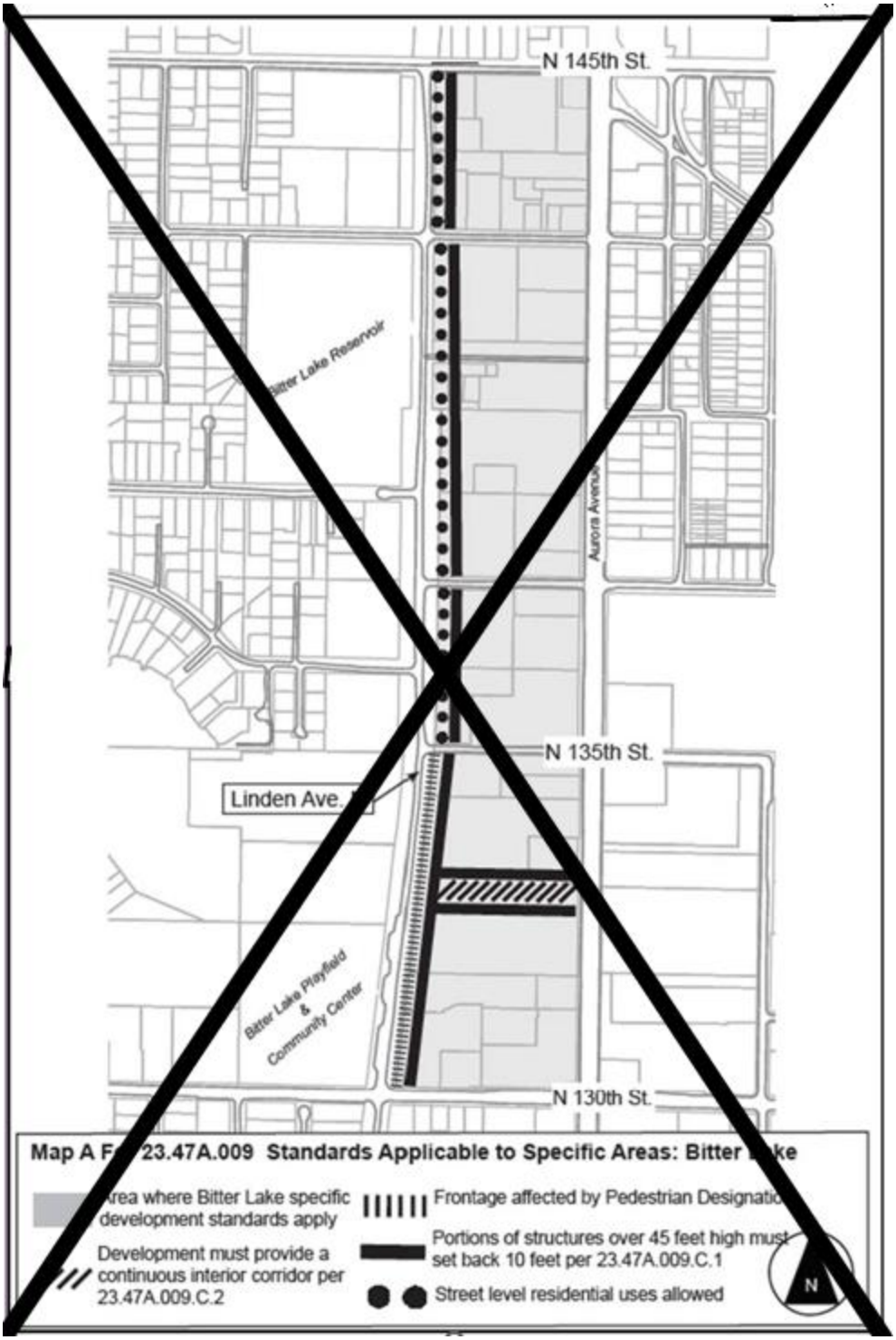
23.47A.009 Standards applicable to specific areas

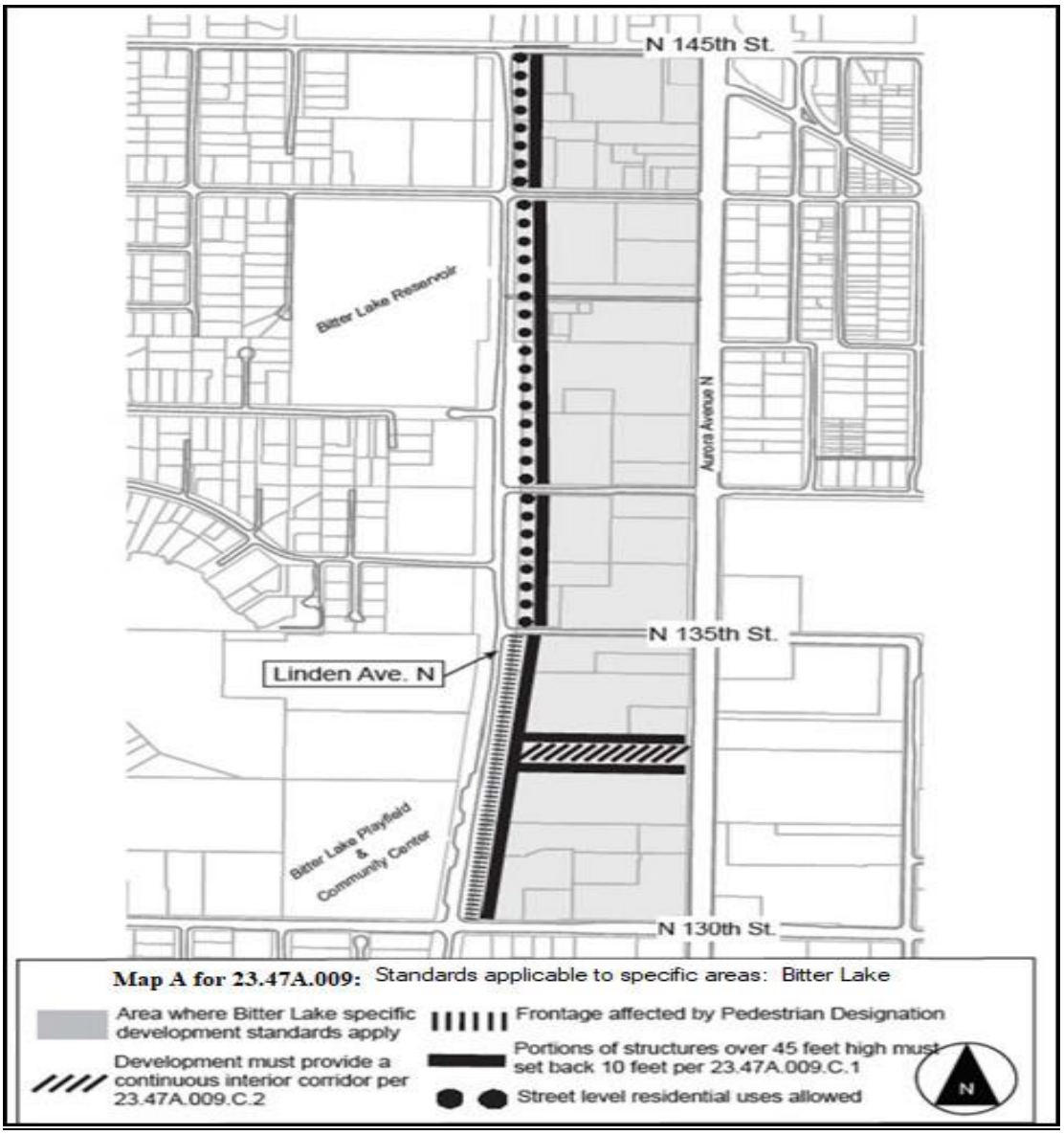
* * *

C. Bitter Lake Village Hub Urban Village. Development on lots designated on Map A for 23.47A.009 shall meet the following requirements:

Map A for 23.47A.009

Standards ((~~Applicable~~)) applicable to ((~~Specific Areas~~)) specific areas: Bitter Lake





1. Upper-level setback requirement. The following standards apply to development on lots abutting the east side of Linden ((~~Ave~~)) Avenue North or along both sides of the corridor required in subsection 23.47A.009.C.2.

a. Any portion of a structure greater than 45 feet in height, measured from the finished grade along the street property line that abuts Linden Avenue North or along the access corridor required in subsection 23.47A.009.C.2, measured from the finished grade along the edge of the access corridor, shall set back an average of 10 feet from the lot line abutting

Linden Avenue North or from the edge of the access corridor as measured according to Section 23.86.012. The maximum depth of a setback that can be used for calculating the average setback is 20 feet.

b. Structures permitted in required setbacks are subject to subsection 23.47A.014.G.

2. Corridor requirement. An access corridor shall be provided on lots over 8 acres that abut Linden Avenue North and Aurora Avenue North, to connect Linden Avenue North and Aurora Avenue North. The location of the proposed corridor shall be clearly shown on the site plan that is submitted with the permit application.

a. The corridor shall have a minimum width of 40 feet and a maximum width of 60 feet.

b. The point at which the corridor intersects Linden Avenue North and Aurora Avenue North shall be at least 335 feet south of the south boundary of the North 135th Street right-of-way, and 700 feet north of the north boundary of the North 130th Street right-of-way, as illustrated by example in Map A for 23.47A.009.

c. The corridor shall include a minimum of one walkway, at least 6 feet wide, extending between Linden Avenue North and Aurora Avenue North. If vehicle access is provided within the corridor, the corridor shall include walkways at least 6 feet wide along both sides of the vehicle access.

d. Landscaping shall be provided along the corridor. If vehicle access is provided within the corridor, trees shall be provided between the walkways and vehicle travel lanes. The Director will determine the number, type, and placement of trees to be provided in order to:

1) Match trees to the available space;

2) Complement existing or planned street trees on abutting streets; and

3) Encourage healthy growth through appropriate spacing.

e. Pedestrian-scaled lighting shall be provided along the corridor.

f. The corridor shall not include any features or structures except the following:

1) Vehicle access, not more than one lane in each direction and meeting the standards of Section 23.54.030.

2) Parking meeting the standards of Section 23.54.030 is allowed along vehicle access lanes within the corridor. Such parking is in addition to the maximum number of spaces allowed under subsection 23.54.015.C.2. The requirements of subsection 23.47A.032.A do not apply to access to parking from the corridor.

3) Overhead horizontal building projections of an architectural or decorative character such as cornices, eaves, sills, and gutter, provided that they project no more than 18 inches from the structure facade.

4) Ramps or other devices that provide access for the disabled and elderly and that meet the standards of the Seattle Building Code are permitted.

5) Stairs or ramps to accommodate changes in grade.

6) Underground structures.

7) Unenclosed porches or steps for residential units no higher than 4 feet above the finished grade of the corridor are permitted to project no more than 4 feet into the corridor.

8) Green stormwater infrastructure.

9) Features required elsewhere in this subsection 23.47A.009.C.2.

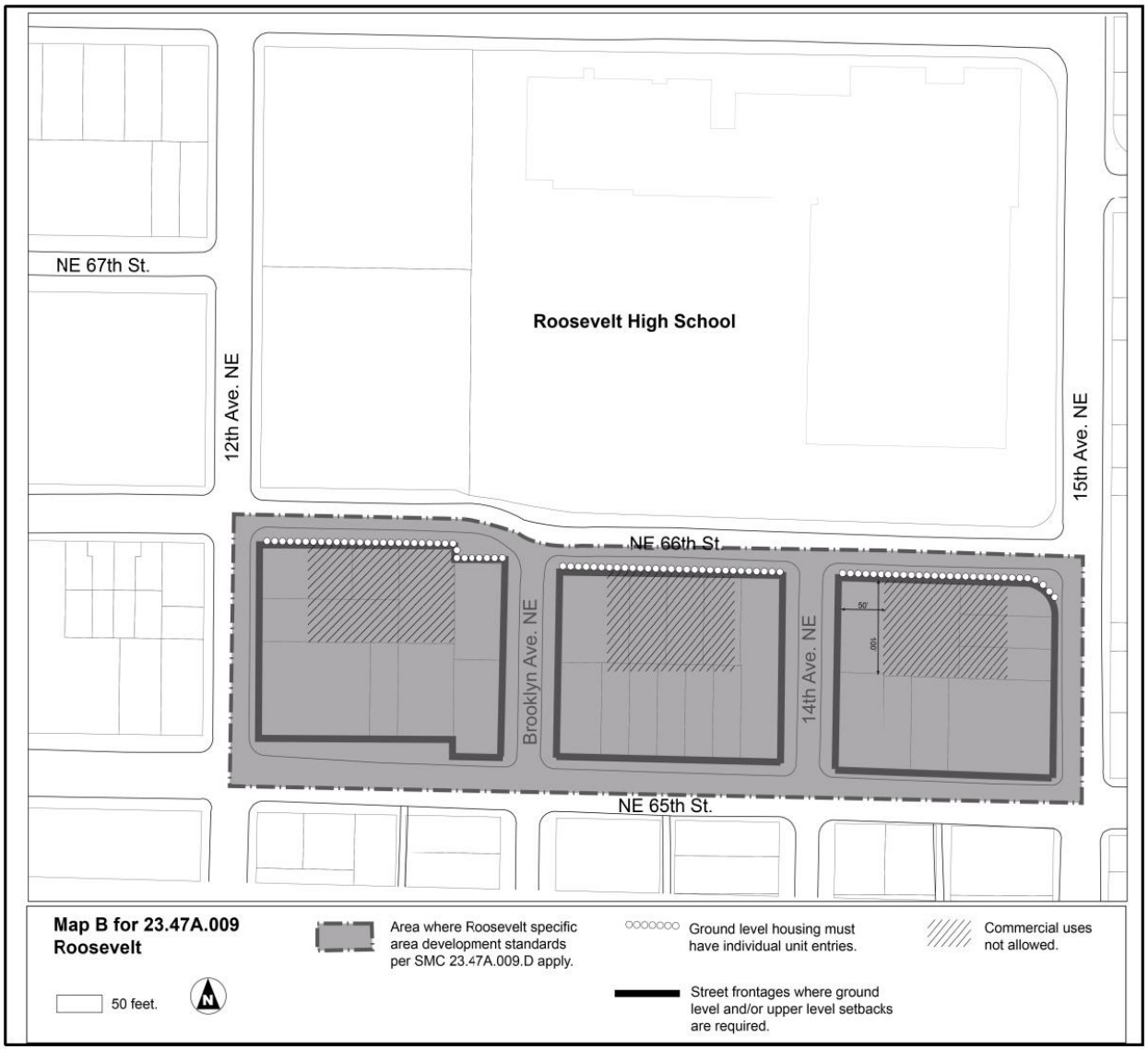
10) The Director may approve other features or structures, such as overhead weather protection, signage, and art, that do not impede safe access from the site to Linden Avenue North and Aurora Avenue North, and that enhance pedestrian comfort and safety of the corridor.

g. If the area proposed for development on a site meeting the size threshold for this subsection 23.47A.009.C.2 is less than the full lot, the Director may waive or modify the access corridor requirement, if the applicant submits a site plan demonstrating how Linden Avenue North and Aurora Avenue North will be connected by an access corridor when the remainder of the lot is developed.

D. Roosevelt Urban Village. The following provisions apply within the area shown on Map B for 23.47A.009.

Map B for 23.47A.009

Roosevelt



1. Setback requirements

a. The following setbacks are required from the listed street property lines:

1) Northeast 66th Street. An average ground-level setback of 10 feet along the length of the street property line and a minimum upper-level setback of 4 feet. The minimum upper-level setback shall be provided in addition to the required ground-level setback

at all points along the length of the street property line at 45 feet of height and above, as measured from average finished grade.

2) Brooklyn Avenue Northeast. An average ground-level setback of 5 feet along the length of the street property line and a minimum upper-level setback of 4 feet. The minimum upper-level setback shall be provided in addition to the required ground-level setback at all points along the length of the street property line at 45 feet of height and above, as measured from average finished grade.

3) 14th Avenue Northeast. An average ground-level setback of 15 feet and a minimum ground-level setback of 5 feet along the length of the street property line and a minimum upper-level setback of 3 feet. The minimum upper-level setback shall be provided in addition to the required ground-level setback at all points along the length of the street property line at 45 feet of height and above, as measured from average finished grade.

4) 15th Avenue Northeast. A minimum ground-level setback of 5 feet along the length of the street property line and an average upper-level setback of 7 feet. The average upper-level setback shall be provided in addition to the required ground-level setback at all points along the length of the street property line at 45 feet of height and above, as measured from average finished grade.

5) Northeast 65th Street and 12th Avenue Northeast. An average ground-level setback of 8 feet shall be provided, and the setback may include pedestrian access and circulation.

b. Structures permitted in required setbacks are subject to subsection 23.47A.014.G, except that:

1) Decks with open railings may project up to 5 feet into the required setback area if they are no lower than 20 feet above existing or finished grade. Decks may cover no more than 20 percent of the total setback area.

2) Stoops or porches providing direct access to individual housing units may project up to 5 feet into the required ground-level setback area, except that portions of stoops or porches not more than 2.5 feet in height from existing or finished grade, whichever is lower, may extend to a street lot line. The 2.5-foot height limit for stoops or porches does not apply to guard rails or hand rails. Such stoops or porches shall cover no more than 20 percent of the total ground-level setback area.

3) Fences no greater than 4 feet in height are permitted in the required ground-level setback, and up to 2 feet of additional height for architectural features such as arbors or trellises on the top of a fence is permitted. Fence height may be averaged along sloping grades for each 4-foot-long segment of the fence, but in no case may any portion of the fence exceed 6 feet in height.

c. Where required setbacks may be averaged, measurement shall be pursuant to subsection ((~~23.86.012.A~~)) 23.86.012.B and the following:

1) Where a building is set back more than 30 feet from a lot line at ground level, 30 feet shall be used as the ground-level setback amount for averaging purposes.

2) Where averaging is allowed for a required upper-level setback, the measurement shall be taken horizontally from points directly above the lot line to the facade of the structure at the height where the upper-level setback is required.

2. Landscaping. Required ground-level setbacks shall be landscaped, and may include paving and lighting to enhance pedestrian safety and comfort. Sidewalks, plazas, and

other amenities or landscaped areas approved by the Director are permitted in required ground-level setbacks.

3. Limit on commercial uses. Commercial uses are prohibited within 80 feet of the street property line of Northeast 66th Street, except within 50 feet of the intersections of Northeast 66th Street with Brooklyn Avenue Northeast, 14th Avenue Northeast, 12th Avenue Northeast, and 15th Avenue Northeast, as shown on Map B for 23.47A.009.

4. Housing units on the ground floor. All housing units with a facade that faces Northeast 66th Street with no intervening housing units or commercial uses between the housing unit and the Northeast 66th Street lot line, and located on the first floor of a building, shall have the primary pedestrian entrance to each housing unit directly accessible from the exterior of the structure rather than a primary pedestrian entry through a common entrance hallway.

5. Underground parking. Parking shall be located below grade, except a portion of a below-grade garage may extend up to 4 feet above existing or finished grade, whichever is lower, provided that the parking that extends above grade is fully screened from direct street view by the street-facing facade of the structure or by landscaping.

* * *

Section 48. Section 23.47A.013 of the Seattle Municipal Code, last amended by Ordinance 126855, is amended as follows:

23.47A.013 Floor area ratio

* * *

B. The following gross floor area is not counted toward FAR:

1. All stories, or portions of stories, that are underground;

2. All portions of a story that extend no more than 4 feet above existing or finished grade, whichever is lower, excluding access;

3. Gross floor area of a transit station, including all floor area open to the general public during normal hours of station operation but excluding retail or service establishments to which public access is limited to customers or clients, even where such establishments are primarily intended to serve transit riders;

4. On a lot containing a peat settlement-prone environmentally critical area, above-grade parking within or covered by a structure or portion of a structure, if the Director finds that locating a story of parking below grade is infeasible due to physical site conditions such as a high water table, if either:

a. The above-grade parking extends no more than 6 feet above existing or finished grade and no more than 3 feet above the highest existing or finished grade along the structure footprint, whichever is lower, as measured to the finished floor level or roof above, pursuant to subsection 23.47A.012.A.3; or

b. All of the following conditions are met:

1) No above-grade parking is exempted by subsection 23.47A.013.B.4.a;

2) The parking is accessory to a residential use on the lot;

3) Total parking on the lot does not exceed one space for each residential dwelling unit plus the number of spaces required for ((~~non-residential~~)) nonresidential uses; and

4) The amount of gross floor area exempted by this subsection 23.47A.013.B.4.b does not exceed 25 percent of the area of the lot in zones with a height limit

less than 65 feet, or 50 percent of the area of the lot in zones with a height limit 65 feet or greater; ((~~and~~))

5. Rooftop greenhouse areas meeting the standards of subsections 23.47A.012.C.4, 23.47A.012.C.5, and 23.47A.012.C.6;

6. Bicycle commuter shower facilities required by subsection ((~~23.54.015.K.8~~)) 23.54.037.H;

7. The floor area of required bicycle parking for small efficiency dwelling units or congregate residence sleeping rooms, if the bicycle parking is located within the structure containing the small efficiency dwelling units or congregate residence sleeping rooms. Floor area of bicycle parking that is provided beyond the required bicycle parking is not exempt from FAR limits;

8. All gross floor area in child care centers; and

9. In low-income housing, all gross floor area for accessory human service uses.

* * *

Section 49. Section 23.47A.032 of the Seattle Municipal Code, last amended by Ordinance 125558, is amended as follows:

23.47A.032 Parking location and access

A. Access to parking

1. NC zones. The following rules apply in NC zones, except as provided under subsections 23.47A.032.A.2 and 23.47A.032.D:

a. Access to parking shall be from the alley if the lot abuts an alley improved to the standards of subsection 23.53.030.C, or if the Director determines that alley

access is feasible and desirable to mitigate parking access impacts. If alley access is infeasible, the Director may allow street access.

b. If access is not provided from an alley and the lot abuts only one street, access is permitted from the street, and limited to one two-way curb cut.

c. If access is not provided from an alley and the lot abuts two or more streets, access is permitted across one of the side street lot lines pursuant to subsection 23.47A.032.C, and curb cuts are permitted pursuant to ((~~subsection 23.54.030.F.2.a.1~~)) Section 23.54.031.

d. For each permitted curb cut, street-facing facades may contain one garage door, not to exceed the maximum width allowed for curb cuts.

2. In addition to the provisions governing NC zones in subsection 23.47A.032.A.1, the following rules apply in pedestrian-designated zones, except as may be permitted under subsection 23.47A.032.D:

a. If access is not provided from an alley and the lot abuts two or more streets, access to parking shall be from a street that is not a principal pedestrian street.

b. If access is not provided from an alley and the lot abuts only a principal pedestrian street or streets, access is permitted from the principal pedestrian street, and limited to one two-way curb cut.

3. In C1 and C2 zones, access to off-street parking may be from a street, alley, or both when the lot abuts an alley. However, structures in C zones with residential uses, structures in C zones with pedestrian designations, and structures in C zones across the street from residential zones shall meet the requirements for parking access for NC zones as provided in subsection 23.47A.032.A.1. If two or more structures are located on a single site, then a single

curb cut shall be provided according to the standards in ((~~Sections~~)) subsections 23.47A.032.A.1((~~,~~)) and 23.47A.032.A.2((~~,~~)) and ((~~23.54.030.F.2~~)) Section 23.54.031.

4. In the event of conflict between the standards for curb cuts in this subsection 23.47A.032.A and the provisions of ((~~subsection 23.54.030.F~~)) Section 23.54.031, the standards in ((~~subsection 23.54.030.F~~)) Section 23.54.031 shall control.

* * *

Section 50. Section 23.48.020 of the Seattle Municipal Code, last amended by Ordinance 127198, is amended as follows:

23.48.020 Floor area ratio (FAR)

* * *

B. Floor area exempt from FAR calculations. The following floor area is exempt from maximum FAR calculations:

1. All underground stories or portions of stories.

2. Portions of a story that extend no more than 4 feet above existing or finished grade, whichever is lower, excluding access.

3. As an allowance for mechanical equipment, in any structure 65 feet in height or more, 3.5 percent of the total chargeable gross floor area in a structure is exempt from FAR calculations. Calculation of the allowance includes the remaining gross floor area after all exempt space allowed in this subsection 23.48.020.B has been deducted. Mechanical equipment located on the roof of a structure, whether enclosed or not, is not included as part of the calculation of total gross floor area.

4. All gross floor area for solar collectors and wind-driven power generators.

5. Bicycle commuter shower facilities required by ((~~subsection 23.54.015.K.8~~)) Section 23.54.037.

6. The floor area of required bicycle parking for small efficiency dwelling units or congregate residence sleeping rooms, if the bicycle parking is located within the structure containing the small efficiency dwelling units or congregate residence sleeping rooms. Floor area of bicycle parking that is provided beyond the required bicycle parking is not exempt from FAR limits.

7. Child care centers.

8. In low-income housing, all gross floor area for accessory human service uses.

9. Other uses permitted by interim street activation provisions in Section 23.42.041.

* * *

Section 51. Section 23.49.019 of the Seattle Municipal Code, last amended by Ordinance 125815, is amended as follows:

23.49.019 Parking quantity, location, and access requirements, and screening and landscaping of parking areas

The regulations in this Section 23.49.019 do not apply to the Pike Market Mixed zones.

A. Parking quantity requirements

1. No parking, either long-term or short-term, is required for uses on lots in ((~~Downtown~~)) downtown zones, except as follows:

a. In the International District Mixed and International District Residential zones, parking requirements for restaurants, motion picture theaters, and other entertainment uses are as prescribed by Section 23.66.342.

b. In the International District Mixed and International District Residential zones, the Director of the Department of Neighborhoods, upon the recommendation of the International District Special Review District Board, may waive or reduce required parking according to the provisions of Section 23.66.342, Parking and access.

c. Bicycle parking is required as specified in ((~~subsection 23.54.015.K~~)) Section 23.54.037.

2. Reduction or elimination of parking required by permits. A property owner may apply to the Director for the reduction or elimination of parking required by any permit issued under this Title 23 or Title 24, except for a condition contained in or required pursuant to any Council conditional use, contract rezone, planned community development, or other Type IV decision. The Director may grant reduction or elimination of required parking as a Type I decision, either as part of a Master Use Permit for the establishment of any new use or structure, or as an independent application for reduction or elimination of parking required by permit. Parking for bicycles may not be reduced or eliminated under this subsection 23.49.019.A.2. Any Transportation Management Plan (TMP) required by permit for the development for which a parking reduction or elimination is proposed shall remain in effect, except that the Director may change the conditions of the TMP to reflect current conditions and to mitigate any parking and traffic impacts of the proposed changes. If any bonus floor area was granted for the parking, then reduction or elimination shall not be permitted except in compliance with applicable provisions regarding the elimination or reduction of bonus features. If any required parking that is allowed to be reduced or eliminated under this subsection 23.49.019.A.2 is the subject of a recorded parking covenant, the Director may authorize modification or release of the covenant.

* * *

C. Maximum parking limits

1. Except as provided in subsections 23.49.019.C.2 and 23.66.342.B, parking for ((~~non-residential~~)) nonresidential uses is limited to a maximum of one parking space per 1,000 square feet.

2. In the area east of Interstate 5, parking for general sales and service uses and for eating and drinking establishments is limited to a maximum of two parking spaces per 1,000 square feet.

D. Ridesharing and transit incentive program requirements. The following requirements apply to all new structures containing more than 10,000 square feet of new ((~~non-residential~~)) nonresidential use, and to structures where more than 10,000 square feet of ((~~non-residential~~)) nonresidential use is proposed to be added.

1. The building owner shall establish and maintain a transportation coordinator position for the proposed structure and designate a person to fill this position, or the building owner may contract with an area-wide transportation coordinator acceptable to the Department. The transportation coordinator shall devise and implement alternative means for employee commuting. The transportation coordinator shall be trained by the Seattle Department of Transportation or by an alternative organization with ridesharing experience, and shall work with the Seattle Department of Transportation and building tenants. The coordinator shall disseminate ridesharing information to building occupants to encourage use of public transit, carpools, vanpools, and flextime; administer the in-house ridesharing program; and aid in evaluation and monitoring of the ridesharing program by the Seattle Department of Transportation. The transportation coordinator in addition shall survey all employees of building tenants once a year to determine commute mode percentages.

2. The Seattle Department of Transportation, in conjunction with the transportation coordinator, shall monitor the effectiveness of the ridesharing/transit incentive program on an annual basis. The building owner shall allow a designated Seattle Department of Transportation or rideshare representative to inspect the parking facility and review operation of the ridesharing program.

3. The building owner shall provide and maintain a transportation information center, which has transit information displays including transit route maps and schedules and Seattle ridesharing program information. The transportation display shall be located in the lobby or other location highly visible to employees within the structure, and shall be established prior to issuance of a certificate of occupancy.

E. Bicycle parking is required according to ((~~subsection 23.54.015.K~~)) Section 23.54.037.

F. Reserved.

* * *

H. Standards for location of access to parking. This subsection 23.49.019.H does not apply to Pike Market Mixed, Pioneer Square Mixed, International District Mixed, and International District Residential zones except that subsection 23.49.019.H.1 applies to International District Mixed and International District Residential zones to the extent stated in subsection 23.66.342.D.

1. Curb cut location

a. If a lot abuts an alley, alley access is required, except as provided in subsection 23.49.019.H.1.c.

b. If a lot does not abut an alley and abuts more than one right-of-way, the location of access is determined by the Director as a Type I decision after consulting with the

Director of the Seattle Department of Transportation. Unless the Director otherwise determines under subsection 23.49.019.H.1.c, access is allowed only from a right-of-way in the category, determined by the classifications shown on Map 1B and Map 1F of the Downtown Overlay Maps or another map identified in a note to Map 1F, that is most preferred among the categories of rights-of-way abutting the lot, according to the ranking set forth below, from most to least preferred (a portion of a street that is included in more than one category is considered as belonging only to the least preferred of the categories in which it is included):

1) Access street;

2) Class II pedestrian street/Minor arterial;

3) Class II pedestrian street/Principal arterial;

4) Class I pedestrian street/Minor arterial;

5) Class I pedestrian street/Principal arterial;

6) Principal transit street;

7) Designated green street.

c. The Director may allow or require access from a right-of-way other than one indicated by subsection 23.49.019.H.1.a or 23.49.019.H.1.b if, after consulting with the Director of the Seattle Department of Transportation on whether and to what extent alternative locations of access would enhance pedestrian safety and comfort, facilitate transit operations, facilitate the movement of vehicles, minimize the on-street queuing of vehicles, enhance vehicular safety, or minimize hazards, and, for hotel use, improve passenger loading safety or increase visibility of vehicular access for guests arriving by car, the Director finds that an exception to the general policy is warranted. The Director may approve an exception for hotel use and impose conditions to minimize any adverse impacts to the pedestrian environment or

street operations, including but not limited to allowing one-way driveways that are less than the minimum width otherwise required. Curb cut controls on designated green streets shall be evaluated on a case-by-case basis, but generally access from green streets is not allowed if access from any other right-of-way is possible.

d. If a street or alley vacation is proposed, the Director shall consult with the Seattle Design Commission on how the location and extent of proposed curb cuts affects or impacts the public realm and how those impacts have been reduced.

2. Curb cut width and number. The width and number of ((~~curbcuts~~)) curb cuts shall comply with Section ((~~23.54.030, Parking space standards~~)) 23.54.031.

I. Screening and landscaping of surface parking areas

1. Screening. Surface parking areas for more than five vehicles shall be screened in accordance with the following requirements:

a. Screening is required along each street lot line.

b. Screening shall consist of:

1) A view-obscuring fence or wall at least 3 feet in height; or

2) A landscaped area with vegetation at least 3 feet in height.

Landscaped areas may include bioretention facilities or landscaped berms, provided that the top of the vegetation is at least 3 feet above the grade abutting the facility or berm.

c. A landscaped strip on the street side of the fence or wall shall be provided if a fence or wall is used for screening. The strip shall be an average of 3 feet from the property line, but at no point less than 1.5 feet wide. Each landscaped strip shall be planted with sufficient shrubs, grass, and/or evergreen groundcover so that the entire strip, excluding

driveways, will be covered in three years. Each landscaped strip may be a bioretention facility, at grade, or a raised berm.

d. Sight triangles shall be provided in accordance with Section ((~~23.54.030, Parking space standards~~)) 23.54.032.

2. Landscaping. Surface parking areas for 20 or more vehicles, except temporary surface parking areas, shall be landscaped according to the following requirements:

a. The amount of landscaped area required is shown on Table B for 23.49.019:

Table B for 23.49.019
Required landscaping for surface parking areas with 20 or more parking spaces

Total number of parking spaces	**Minimum required landscaped area**
20 to 50	18 square feet per parking space
51 to 99	25 square feet per parking space
100 or more spaces	35 square feet per parking space

b. The minimum size of a required landscaped area is 100 square feet. Berms provided to meet the screening standards in subsection 23.49.019.I.1 may be counted as part of a landscaped area. No part of a landscaped area shall be less than 4 feet in any dimension except those dimensions reduced by turning radii or angles of parking spaces.

c. The landscaped area may include bioretention facilities.

d. No parking stall shall be more than 60 feet from a required landscaped area.

e. One tree per every five parking spaces is required.

f. Each tree shall be at least 3 feet from any curb of a landscaped area or edge of the parking area.

g. Permanent curbs or structural barriers shall protect landscaped areas.

h. Sufficient hardy evergreen groundcover shall be planted to cover each landscaped area completely within three years. Trees shall be selected from the Seattle Department of Transportation's list for parking area planting.

J. Transportation management programs

1. When a development is proposed that is expected to generate 50 or more employees single-occupant vehicle (SOV) trips in any one p.m. hour, the applicant shall prepare and implement a Transportation Management Program (TMP) consistent with requirements for TMPs in any applicable Director's Rule.

a. For purposes of measuring attainment of SOV goals contained in the TMP, the proportion of SOV trips shall be calculated for the p.m. hour in which an applicant expects the largest number of vehicle trips to be made by employees at the site (the p.m. peak hour of the generator). The proportion of SOV trips shall be calculated by dividing the total number of employees using an SOV to make a trip during the expected peak hour by the total number of employee person trips during the expected peak hour.

b. Compliance with this ((~~section~~)) Section 23.49.019 does not supplant the responsibility of any employer to comply with Seattle's Commute Trip Reduction (CTR) Ordinance.

2. An applicant who proposes multifamily development that is expected to generate 50 or more vehicle trips in any one p.m. hour or demand for 25 or more vehicles parking on the street overnight shall prepare and implement a TMP. The TMP shall be consistent

with requirements for TMPs in any applicable Director's Rule. For purposes of measuring attainment of the SOV goal, the proportion of SOV trips shall be calculated for the p.m. hour in which an applicant expects the largest number of vehicle trips to be made by residents of the site (the p.m. peak hour of the generator). The proportion of SOV trips shall be calculated by dividing the total number of residential trips made by SOV during the expected peak hour by the total number of residential person trips.

3. Each owner subject to the requirements of this ((~~section~~)) Section 23.49.019 shall prepare a TMP as described in rules promulgated by the Director, as part of the requirements for obtaining a master use permit.

4. The TMP shall be approved by the Director if, after consulting with the Seattle Department of Transportation, the Director determines that the TMP measures are likely to achieve the mode-share targets for trips made by travel modes other than driving alone for the Downtown Urban Center in 2035 that are contained in Seattle's Comprehensive Plan's Transportation Element.

K. Electric vehicle charging infrastructure. Off-street parking spaces shall be designed according to the standards of ((~~subsection 23.54.030.L~~)) Section 23.54.034.

Section 52. Section 23.50.028 of the Seattle Municipal Code, last amended by Ordinance 126864, is amended as follows:

23.50.028 Floor area

* * *

B. Exemptions from FAR calculations

1. The following areas are exempt from FAR calculations in all industrial zones:

a. All stories, or portions of stories, that are underground;

b. All gross floor area used for accessory parking, except as provided in subsection 23.50.028.D;

c. All gross floor area located on the rooftop of a structure and used for any of the following: mechanical equipment, stair and elevator penthouses, and communication equipment and antennas;

d. All gross floor area used for covered rooftop recreational space of a building existing as of December 31, 1998, in an IG1 or IG2 zone, if complying with subsection 23.50.012.D; and

e. Bicycle commuter shower facilities required by subsection ((~~23.54.015.K.8~~)) 23.54.037.H.

2. In addition to areas exempt from FAR calculations in subsection 23.50.028.B.1, within IG1 and IG2 zones, the gross floor area of rooftop recreational space accessory to office use meeting the standards of subsection 23.50.012.D is exempt from FAR calculations.

Section 53. Section 23.51A.002 of the Seattle Municipal Code, last amended by Ordinance 126685, is amended as follows:

23.51A.002 Public facilities in ((~~neighborhood residential~~)) Neighborhood Residential zones

A. Except as provided in subsections ((~~B, D and E of this Section 23.51A.002~~)) 23.51A.002.B, 23.51A.002.D and 23.51A.002.F, uses in public facilities that are most similar to uses permitted outright or permitted as an administrative conditional use under Chapter 23.44 are also permitted outright or as an administrative conditional use, subject to the same use regulations, development standards and administrative conditional use criteria that govern the similar use. The City Council may waive or modify applicable development standards or administrative conditional use criteria according to the provisions of Chapter 23.76, Subchapter

III, ((~~Council Land Use Decisions,~~)) with public projects considered as Type IV quasi-judicial decisions and City facilities considered as Type V legislative decisions.

B. Permitted ((~~Uses~~)) uses in ((~~Public Facilities Requiring~~)) public facilities requiring City Council ((~~Approval~~)) approval. The following uses in public facilities in ((~~neighborhood residential~~)) Neighborhood Residential zones may be permitted by the City Council, according to the provisions of Chapter 23.76((~~, Procedures for Master Use Permits and Council Land Use Decisions~~)):

1. Police precinct station;

2. Fire station;

3. Public boat moorage;

4. Utility services use; and

5. Other similar use.

The proponent of any such use shall demonstrate the existence of a public necessity for the public facility use in a ((~~neighborhood residential~~)) Neighborhood Residential zone. The public facility use shall be developed according to the development standards for institutions (Section ((~~23.44.022~~)) 23.44.180), unless the City Council makes a determination to waive or modify applicable development standards according to the provisions of Chapter 23.76, Subchapter III, ((~~Council Land Use Decisions,~~)) with public projects considered as Type IV quasi-judicial decisions and City facilities considered as Type V legislative decisions.

* * *

D. Sewage treatment plants. The expansion or reconfiguration (which term shall include reconstruction, redevelopment, relocation on the site, or intensification of treatment capacity) of existing sewage treatment plants in ((~~neighborhood residential~~)) Neighborhood Residential zones

may be permitted if there is no feasible alternative location in a zone where the use is permitted and the conditions imposed under subsections 23.51A.002.D.3 and 23.51A.002.D.4 are met.

1. Applicable procedures. Except as provided in subsection 23.51A.002.C.2.a, the decision on an application for the expansion or reconfiguration of a sewage treatment plant is a Type IV Council land use decision. If an application for an early determination of feasibility is required to be filed pursuant to subsection 23.51A.002.D.2, the early determination of feasibility will also be a Council land use decision subject to Sections 23.76.038 through 23.76.056.

2. Need for feasible alternative determination. The proponent shall demonstrate that there is no feasible alternative location in a zone where establishment of the use is permitted.

a. The Council's decision as to the feasibility of alternative location(s) shall be based upon a full consideration of the environmental, social, and economic impacts on the community, and the intent to preserve and to protect the physical character of neighborhood residential areas, and to protect neighborhood residential areas from intrusions of ((~~non-single-family~~)) nonresidential uses.

b. The determination of feasibility may be the subject of a separate application for a Council land use decision prior to submission of an application for a project-specific approval if the Director determines that the expansion or reconfiguration proposal is complex, involves the phasing of programmatic and project-specific decisions, or affects more than one site in a ((~~neighborhood residential~~)) Neighborhood Residential zone.

c. Application for an early determination of feasibility shall include:

1) The scope and intent of the proposed project in the ((~~neighborhood residential~~)) Neighborhood Residential zone and appropriate alternative(s) in zones where establishment of the use is permitted, identified by the applicant or the Director;

2) The necessary environmental documentation as determined by the Director, including an assessment of the impacts of the proposed project and of the permitted-zone alternative(s), according to the state and local SEPA guidelines;

3) Information on the overall sewage treatment system that outlines the interrelationship of facilities in ((~~neighborhood residential~~)) Neighborhood Residential zones and in zones where establishment of the use is permitted;

4) Schematic plans outlining dimensions, elevations, locations on site, and similar specifications for the proposed project and for the alternative(s).

d. If a proposal or any portion of a proposal is also subject to a feasible alternative location determination under Section 23.60A.066, the Plan Shoreline Permit application and the early determination application will be considered in one determination process.

3. Conditions for ((~~Approval~~)) approval of ((~~Proposal.~~)) proposal

a. The project is located so that adverse impacts on residential areas are minimized.

b. The expansion of a facility does not result in a concentration of institutions or facilities that would create or appreciably aggravate impacts that are incompatible with single-family residences.

c. A facility management and transportation plan is required. The level and kind of detail to be disclosed in the plan shall be based on the probable impacts and/or scale of the proposed facility, and shall at a minimum include discussion of sludge transportation, noise control, and hours of operation. Increased traffic and parking expected to occur with use of the facility shall not create a serious safety problem or a blighting influence on the neighborhood.

d. Measures to minimize potential odor emission and airborne pollutants including methane shall meet standards of and be consistent with best available technology as determined in consultation with the Puget Sound Clean Air Agency (PSCAA), and shall be incorporated into the design and operation of the facility.

e. Methods of storing and transporting chlorine and other hazardous and potentially hazardous chemicals shall be determined in consultation with the Seattle Fire Department and incorporated into the design and operation of the facility.

f. Vehicular access suitable for trucks is available or provided from the plant to a designated arterial improved to City standards.

g. The bulk of facilities shall be compatible with the surrounding community. Public facilities that do not meet bulk requirements may be located in ((~~neighborhood residential~~)) Neighborhood Residential zones if there is a public necessity for their location there.

h. Landscaping and screening, separation from less intensive zones, noise, light and glare controls, and other measures to ensure the compatibility of the use with the surrounding area and to mitigate adverse impacts shall be incorporated into the design and operation of the facility.

i. No residential structures, including those modified for nonresidential use, are demolished for facility expansion unless a need has been demonstrated for the services of the institution or facility in the surrounding community.

4. Substantial ((~~Conformance~~)) conformance. If the application for a project-specific proposal is submitted after an early determination that location of the sewage treatment plant is not feasible in a zone where establishment of the use is permitted, the proposed project

must be in substantial conformance with the feasibility determination. Substantial conformance shall include, but not be limited to, a determination that:

a. There is no net substantial increase in the environmental impacts of the project-specific proposal as compared to the impacts of the proposal as approved in the feasibility determination.

b. Conditions included in the feasibility determination are met.

E. Prohibited ((~~Uses~~)) uses. ((~~The~~)) Unless determined to be an essential public facility under Chapter 23.80, the following public facilities are prohibited in ((~~neighborhood residential~~)) Neighborhood Residential zones:

1. Jails;

2. Metro operating bases;

3. Park and ride lots;

4. Establishment of new sewage treatment plants;

5. Solid waste transfer stations;

6. Animal control shelters;

7. Post Office distribution centers; and

8. Work-release centers.

F. Essential ((~~Public Facilities~~)) public facilities. ((~~Permitted essential~~)) Essential public facilities shall also be reviewed according to the provisions of Chapter 23.80((~~, Essential Public Facilities~~)).

Section 54. Section 23.51B.002 of the Seattle Municipal Code, last amended by Ordinance 126685, is amended as follows:

23.51B.002 Public schools in residential zones

* * *

C. Lot ((~~Coverage~~)) coverage in Neighborhood Residential ((~~Zones~~)) zones

1. For new public school construction on new public school sites, the maximum lot coverage permitted for all structures is ((~~45 percent of the lot area for one-story structures or 35 percent of the lot area if any structure or portion of a structure has more than one story~~)) as provided in Section 23.44.080.

2. For new public school construction and additions to existing public school structures on existing public school sites, the maximum lot coverage permitted is the greater of the following:

a. The lot coverage ((~~permitted in subsection 23.51B.002.C.1~~)) provided in Section 23.44.080; or

b. The lot coverage of the former school structures on the site, provided that the height of the new structure or portion of structure is no greater than that of the former structures when measured according to ((~~Section 23.86.006.F~~)) subsection 23.86.006.E, and at least 50 percent of the footprint of the new principal structure is constructed on a portion of the lot formerly occupied by the footprint of the former principal structure.

3. Departures from lot coverage limits may be granted or required pursuant to the procedures and criteria set forth in Chapter 23.79. ((~~Up to 55 percent lot coverage may be allowed for single-story structures, and up to 45 percent lot coverage for structures of more than one story.~~)) Lot coverage restrictions may be waived by the Director as a Type I decision when waiver would contribute to reduced demolition of residential structures.

((~~4. The exceptions to lot coverage set forth in subsection 23.44.010.D apply.~~))

D. Height

1. Neighborhood Residential and ((~~Lowrise Zones~~)) lowrise zones

a. For new public school construction on new public school sites, the maximum permitted height is ((~~30~~)) 32 feet plus 5 feet for a pitched roof. For gymnasiums and auditoriums that are accessory to the public school, the maximum permitted height is 35 feet plus 10 feet for a pitched roof if all portions of the structure above 30 feet are set back at least 20 feet from all lot lines. All parts of a pitched roof above the height limit must be pitched at a rate of not less than 4:12. No portion of a shed roof on a gymnasium or auditorium is permitted to extend above the 35-foot height limit under this ((~~provision~~)) subsection 23.51B.002.D.1.a.

b. For new public school construction on existing public school sites, the maximum permitted height is 35 feet plus 15 feet for a pitched roof. All parts of the roof above the height limit must be pitched at a rate of not less than 4:12. No portion of a shed roof is permitted to extend beyond the 35-foot height limit under this ((~~provision~~)) subsection 23.51B.002.D.1.b.

c. For additions to existing public schools on existing public school sites, the maximum height permitted is the height of the existing school or 35 feet plus 15 feet for a pitched roof, whichever is greater. When the height limit is 35 feet, the ridge of the pitched roof on a principal structure may extend up to 15 feet above the height limit, and all parts of the roof above the height limit must be pitched at a rate of not less than 4:12. No portion of a shed roof is permitted to extend beyond the 35-foot limit under this ((~~provision~~)) subsection 23.51B.002.D.1.c.

2. Midrise and ((~~Highrise Zones~~)) highrise zones. The maximum permitted height for any public school located in a MR or HR zone is the base height permitted in that zone for multifamily structures.

3. In ((~~Lowrise~~)) lowrise zones, departures from height limits may be granted or required pursuant to the procedures and criteria set forth in Chapter 23.79. For construction of new structures on new and existing public school sites to the extent not otherwise permitted outright, the maximum height that may be granted as a development standard departure is 35 feet plus 15 feet for a roof pitched at a rate of not less than 4:12 for elementary schools and 60 feet plus 15 feet for a roof pitched at a rate of not less than 4:12 for secondary schools. No departures may be granted for a portion of a shed roof to extend beyond 35 feet in height under this ((~~provision~~)) subsection 23.51B.002.D.3.

4. Height maximums in all residential zones may be waived by the Director as a Type I decision when the waiver would contribute to reduced demolition of residential structures.

5. The provisions of subsection ((~~B of Section 23.44.012~~)) 23.44.070.B and the exemptions of subsection ((~~C of Section 23.44.012~~)) 23.44.070.C apply.

6. Light ((~~Standards~~)) standards

a. Light standards for illumination of athletic fields on new and existing public school sites may be allowed to exceed the maximum permitted height, up to a maximum height of 100 feet, if the Director determines that the additional height is necessary to ensure adequate illumination and that impacts from light and glare are minimized to the greatest extent practicable. The applicant must submit an engineer's report demonstrating that impacts from light and glare are minimized to the greatest extent practicable. When proposed light standards are reviewed as part of a project being reviewed pursuant to Chapter 25.05, ((~~Environmental Policies and Procedures,~~)) and requiring a SEPA determination, the applicant must demonstrate that the additional height contributes to a reduction in impacts from light and glare.

b. When proposed light standards are not included in a proposal being reviewed pursuant to Chapter 25.05, the Director may permit the additional height as a special exception subject to Chapter 23.76((~~, Procedures for Master Use Permits and Council Land Use Decisions~~)).

1) When seeking a special exception for taller light standards, the applicant must submit an engineer's report demonstrating that the additional height contributes to a reduction in impacts from light and glare. When the proposal will result in extending the lighted area's duration of use, the applicant must address and mitigate potential impacts, including but not limited to, increased duration of noise, traffic, and parking demand. The applicant also shall conduct a public workshop for residents within 1/8 ((~~of a~~)) mile of the affected school in order to solicit comments and suggestions on design as well as potential impacts.

2) The Director may condition a special exception to address negative impacts from light and glare on surrounding areas, and conditions may also be imposed to address other impacts associated with increased field use due to the addition of lights, including, but not limited to, increased noise, traffic, and parking demand.

E. Setbacks

1. General requirements

a. No setbacks are required for new public school construction or for additions to existing public school structures for that portion of the site across a street or an alley or abutting a lot in a nonresidential zone. If any portion of the site is across a street or an alley from or abuts a lot in a residential zone, setbacks are required for areas facing or abutting residential zones, as provided in subsections ((~~E.2 through E.5 of this Section 23.51B.002~~))

23.51B.002.E.2 through 23.51B.002.E.5. Setbacks for sites across a street or alley from or abutting lots in Residential-Commercial (RC) zones are based upon the residential zone classification of the RC lot.

b. The minimum setback requirement may be averaged along the structure facade with absolute minimums for areas abutting lots in residential zones as provided in subsections ((~~E.2.b, E.3.b and E.4.b of this Section 23.51B.002~~)) 23.51B.002.E.2.b, 23.51B.002.E.3.b, and 23.51B.002.E.4.b.

c. Trash disposals, operable windows in a gymnasium, main entrances, play equipment, kitchen ventilators, or other similar items shall be located at least 30 feet from any ((~~neighborhood residential~~)) Neighborhood Residential zoned lot and 20 feet from any multi-family zoned lot.

d. The exceptions of subsections ((~~23.44.014.C.5, 23.44.014.C.6, 23.44.014.C.7, 23.44.014.C.8, 23.44.014.C.9, 23.44.014.C.10, 23.44.014.C.11, and 23.44.014.C.12~~)) 23.44.090.D, 23.44.090.E, 23.44.090.G, 23.44.090.H, and 23.44.090.I apply.

2. New public school construction on new public school sites((~~.~~))

a. New public school construction on new public school sites across a street or alley from lots in residential zones shall provide minimum setbacks according to the height of the school and the designation of the facing residential zone, as shown in Table A for 23.51B.002((~~:~~)) .

((~~Table A for 23.51B.002: Minimum Setbacks for a New Public School Site Located Across a Street or Alley from a Residential Zone~~))

Table A for 23.51B.002 **Average setbacks for a new public school site located across a street or alley from a residential zone (in feet)**				
	((~~Minimum Setbacks Across a Street or Alley from the Following Zones (in feet):~~)) Zone across street or alley and average setback			
((~~Height~~)) Facade height	**((~~NR/L1~~)) NR/LR1**	**LR2/LR3**	**MR**	**HR**
	((~~Average~~))			
20 or less	15	10	5	0
Greater than 20 up to 35	15	10	5	0
Greater than 35 up to 50	20	15	5	0
Greater than 50	35	20	10	0

b. New public school construction on new public school sites abutting lots in residential zones shall provide minimum setbacks according to the height of the school and the designation of the abutting residential zone, as shown in Table B for 23.51B.002((:)) .

((~~Table B for 23.51B.002: Minimum Setbacks for a New Public School Site Abutting a Residential Zone~~))

Table B for 23.51B.002 **Setbacks for a new public school site abutting a residential zone (in feet)**				
	((~~Minimum Setbacks Abutting the Following Zones (in feet):~~)) Abutting zone and setbacks			
((~~Height~~)) Facade height	**NR/LR1**	**LR2/LR3**	**MR**	**HR**
	((~~Average (minimum)~~))			
20 or less	20(10)	15(10)	10(5)	0(0)
Greater than 20 up to 35	25(10)	15(10)	10(5)	0(0)
Greater than 35 up to 50	25(10)	20(10)	10(5)	0(0)
Greater than 50	30(15)	25(10)	15(5)	0(0)
Footnote to Table B for 23.51B.002 Average setbacks are shown outside of the parentheses and minimum setbacks are shown in parentheses.				

3. New public school construction on existing public school sites((.))

a. New public school construction on existing public school sites across a street or alley from lots in residential zones shall provide either the setback of the previous

structure on the site or minimum setbacks according to the ((I)) height of the school and the designation of the facing residential zone as shown in Table C for 23.51B.002, whichever is less((:)) .

((~~Table C for 23.51B.002: Minimum Setbacks for New Construction on an Existing Public School Site Located Across a Street or Alley from a Residential Zone~~))

Table C for 23.51B.002
Setbacks for new construction on an existing public school site located across a street or alley from a residential zone (in feet)

	((~~Minimum Setbacks If Across a Street or Alley from the Following Zones (in feet):~~)) Zone across street or alley and average setback			
((~~Façade Height~~)) Facade height	**NR/LR1**	**LR2/LR3**	**MR**	**HR**
	((~~Average~~))			
20 or less	10	5	5	0
Greater than 20 up to 35	10	5	5	0
Greater than 35 up to 50	15	10	5	0
Greater than 50	20	15	10	0

b. New public school construction on existing public school sites abutting lots in residential zones shall provide either the setback of the previous structure on the site or minimum setbacks according to the height of the school and the designation of the abutting residential zone, as shown in Table D for 23.51B.002, whichever is less((:)) .

((~~Table D for 23.51B.002: Minimum Setbacks for New Construction on an Existing Public School Site Abutting a Residential Zone~~))

Table D for 23.51B.002 **Setbacks for new construction on an existing public school site abutting a residential zone (in feet)**				
	((~~Minimum Setbacks Abutting the Following Zones (in feet):~~)) Abutting zone and setback			
((~~Façade Height~~)) Facade height	**NR/LR1**	**LR2/LR3**	**MR**	**HR**
	((~~Average (minimum)~~))			
20 or less	15(10)	10(5)	10(5)	0(0)
Greater than 20 up to 35	20(10)	15(10)	10(5)	0(0)
Greater than 35 up to 50	25(10)	20(10)	10(5)	0(0)
Greater than 50	30(15)	25(10)	15(5)	0(0)
Footnote to Table D for 23.51B.002 Average setbacks are shown outside of the parentheses and minimum setbacks are shown in parentheses.				

4. Additions to ((~~Existing Public School Structures~~)) existing public school structures on ((~~Existing Public School Sites.~~)) existing public school sites

a. Additions to existing public school structures on existing public school sites across a street or alley from lots in residential zones shall provide either the setback of the previous structure on the site or minimum setbacks according to the height of the school and the designation of the facing residential zone as shown in Table E for 23.51B.002, whichever is less((~~:~~)) .

((~~Table E for 23.51B.002: Minimum Setbacks for Additions on an Existing Public School Site Located Across a Street or Alley~~))

Table E for 23.51B.002 **Setbacks for additions on an existing public school site located across a street or alley from a residential zone (in feet)**				
	((~~Minimum Setbacks (in feet) If Located Across a Street or Alley from:~~)) Zone across street or alley and average setback			
((~~Façade Height~~)) Facade height	**NR/LR1**	**LR2/LR3**	**MR**	**HR**
	((~~Average~~))			
20 or less	5	5	5	0

Greater than 20 up to 35	10	5	5	0
Greater than 35 up to 50	15	10	5	0
Greater than 50	20	15	10	0

b. Additions to public schools on existing public school sites abutting lots in residential zones shall provide either the setback of the previous structure on the site or minimum setbacks according to the height of the school and the designation of the abutting residential zone as shown in Table F for 23.51B.002, whichever is less((:)) .

((~~Table F for 23.51B.002: Minimum Setbacks for Additions on an Existing Public School Site Abutting a Residential Zone~~))

Table F for 23.51B.002
Setbacks for additions on an existing public school site abutting a residential zone (in feet)

	((~~Minimum Setbacks by Abutting Zone (in feet):~~)) **Abutting zone and setback**			
((~~Façade Height~~)) **Facade height**	**NR/LR1**	**LR2/LR3**	**MR**	**HR**
	((~~Average (minimum)~~))			
20 or less	10(5)	10(5)	10(5)	0(0)
Greater than 20 up to 35	15(5)	10(5)	10(5)	0(0)
Greater than 35 up to 50	20(10)	20(10)	10(5)	0(0)
Greater than 50	25(10)	25(10)	15(5)	0(0)
Footnote to Table F for 23.51B.002 Average setbacks are shown outside of the parentheses and minimum setbacks are shown in parentheses.				

5. Departures from setback requirements may be granted or required pursuant to the procedures and criteria set forth in Chapter 23.79 as follows:

a. The minimum average setback may be reduced to 10 feet and the minimum setback to 5 feet for structures or portions of structures across a street or alley from lots in residential zones.

b. The minimum average setback may be reduced to 15 feet and the minimum setback to 5 feet for structures or portions of structures abutting lots in residential zones.

c. The limits in subsections ((~~E.5.a and E.5.b of this Section 23.51B.002~~)) 23.51B.002.E.5.a and 23.51B.002.E.5.b may be waived by the Director if a waiver would contribute to reduced demolition of residential structures.

F. Structure ((~~Width.~~)) width

1. When a new public school structure is built on a new public school site or on an existing public school site, the maximum width of a structure is 66 feet unless either the modulation option in subsection 23.51B.002.F.1.a ((~~below~~)) or the landscape option in subsection 23.51B.002.F.1.b ((~~below~~)) is met.

a. Modulation ((~~Option~~)) option. Facades shall be modulated according to the following provisions:

1) The minimum depth of modulation is 4 feet.

2) The minimum width of modulation is 20 percent of the total structure width or 10 feet, whichever is greater.

b. Landscape ((~~Option~~)) option. The ((~~yards provided by the required~~)) setbacks shall be landscaped as follows:

1) One tree and three shrubs are required for each 300 square feet of ((~~required yard~~)) setback area.

2) Trees and shrubs that already exist in the required planting area or have their trunk or center within 10 feet of the area may be substituted for required plantings

on a one-tree-to-one-tree or one-shrub-((-))to-one-shrub basis. In order to qualify, a tree must be 6 inches or greater in diameter, measured 4.5 feet above the ground.

3) The planting of street trees may be substituted for required trees on a one-to-one basis. All street trees shall be planted according to City of Seattle tree planting standards.

4) Each setback required to be landscaped shall be planted with shrubs, grass, and/or evergreen ground cover.

5) Landscape features such as decorative paving are permitted to a maximum of 25 percent of each required landscaped area.

6) A plan shall be filed showing the layout of the required landscaping.

7) The School District shall maintain all landscape material and replace any dead or dying plants.

2. There is no maximum width limit for additions to existing public school structures on existing public school sites. The Director may require landscaping to reduce the appearance of bulk.

3. Departures from the modulation and landscaping standards may be granted or required pursuant to the procedures and criteria set forth in Chapter 23.79 to permit other techniques to reduce the appearance of bulk. Techniques to reduce the appearance of bulk may be waived by the Director as a Type I decision when the waiver would contribute to reduced demolition of residential structures.

G. Parking ((~~Quantity~~)) quantity. Parking shall be required as provided in Chapter 23.54.

H. Parking ((~~Location~~)) location. Parking may be located:

1. Within the principal structure; or

2. On any portion of the lot except the front setback, provided that the parking is separated from streets and from abutting lots in residential zones by an area with a minimum depth of 5 feet that is landscaped with trees and ground cover determined by the Director, as a Type I decision, as adequate to soften the view of the parking from adjacent properties. In the case of a through lot, parking may also be located in one front setback when landscaped as described in this subsection 23.51B.002.H.2;

3. Departures may be granted or required pursuant to the procedures set forth in Chapter 23.79 to permit parking location anywhere on the lot and to reduce required landscaping. Landscaping may be waived in whole or in part if the topography of the site or other circumstances result in the purposes of landscaping being served, as, for example, when a steep slope shields parking from the view of abutting properties. This test may be waived by the Director, as a Type I decision, when waiver would contribute to reduced demolition of residential structures.

I. Bus and ((~~Truck Loading~~)) truck loading and ((~~Unloading.~~)) unloading

1. Unless subsection ((~~I.4 of this section 23.51B.002~~)) 23.51B.002.I.4 applies, an off-street bus loading and unloading area of a size reasonable to meet the needs of the school shall be provided and may be located in any required ((~~yard~~)) setback. The bus loading and unloading area may be permitted in landscaped areas provided under subsection 23.51B.002.F.1.b if the Director determines that landscaping around the loading and unloading area softens the impacts of its appearance on abutting properties.

2. One off-street truck loading berth that is 13 feet wide and 40 feet long is required for new public school construction.

3. Departures from the requirements and standards for bus and truck loading and unloading areas and berths may be granted or required pursuant to the procedures and criteria set forth in Chapter 23.79 only when departure would contribute to reduced demolition of residential structures.

4. When a public school is remodeled or rebuilt at the same site, an existing on-street bus loading area is allowed if the following conditions are met:

a. The school site is not proposed to be expanded;

b. The student capacity of the school is not being expanded by more than 25 percent; and

c. The location of the current on-street bus loading remains the same.

J. Noise, ((~~Odor, Light~~)) odor, light, and ((~~Glare~~)) glare. The development standards for small institutions set forth in Section 23.45.570 apply. Departures from these standards may be granted or required pursuant to the procedures and criteria set forth in Chapter 23.79 only when departure would contribute to reduced demolition of residential structures.

Section 55. Section 23.53.006 of the Seattle Municipal Code, last amended by Ordinance 127099, is amended as follows:

23.53.006 Pedestrian access and circulation

* * *

F. Exceptions. The following exceptions to pedestrian access and circulation requirements and standards apply:

1. Projects exempt from requirements. Pedestrian access and circulation improvements are not required for the following types of projects:

a. Change of use;

b. Alterations to existing structures;

c. Additions to existing structures that are exempt from environmental review;

d. Construction of a detached structure that does not contain a dwelling unit and is accessory to ((~~a single-family~~)) an existing dwelling unit in any zone, if the property owner enters into a no-protest agreement, as authorized by chapter 35.43 RCW, to future pedestrian access and circulation improvements and that agreement is recorded with the King County ((~~Recorder~~)) Recorder's Office;

e. Construction of ((~~a single-family~~)) one dwelling unit on a lot in any zone, if the property owner enters into a no-protest agreement, as authorized by chapter 35.43 RCW, to future pedestrian access and circulation improvements and that agreement is recorded with the King County ((~~Recorder~~)) Recorder's Office, and if at least one of the following conditions is met:

1) The lot is on a block front where there are no existing pedestrian access and circulation improvements within 100 feet of the lot; or

2) Construction of pedestrian access and circulation improvements is not necessary because, for example, the existing right-of-way has suitable width and surface treatment for pedestrian use; or the existing right-of-way has a limited amount of existing and potential vehicular traffic; or the Director anticipates limited, if any, additional development near the lot because the development near the lot is at or near zoned capacity under current zoning designations;

f. Construction of accessory dwelling units;

((~~f.~~)) g. Expansions of surface parking, outdoor storage, outdoor sales and outdoor display of rental equipment of less than 20 percent of the parking, storage, sales or display area, or number of parking spaces;

((~~g.~~)) h. In the MML zone, the addition of:

1) Fewer than ten artist's studio dwellings;

2) Less than 750 square feet of gross floor area of major and minor vehicle repair uses and multipurpose retail sales; ((~~and~~)) or

3) Less than 4,000 square feet of gross floor area of ((~~non-residential~~)) nonresidential uses not listed in subsection ((~~23.53.006.F.1.g.2~~)) 23.53.006.F.1.h.2; and

((~~h.~~)) i. Construction of a new ((~~non-residential~~)) nonresidential structure of up to 4,000 square feet of gross floor area if the structure is at least 50 feet from any lot line abutting an existing street that does not have pedestrian access and circulation improvements.

2. Waiver or modification of pedestrian access and circulation requirements. The Director, in consultation with the Director of Transportation, may waive or modify pedestrian access and circulation requirements when one or more of the following conditions are met. The waiver or modification shall provide the minimum relief necessary to accommodate site conditions while maximizing pedestrian access and circulation.

a. Location in an environmentally critical area or buffer makes installation of a sidewalk, curb, and/or curb ramp structurally impracticable or technically infeasible;

b. The existence of a bridge, viaduct, or structure such as a substantial retaining wall in proximity to the project site makes installation of a sidewalk, curb, and/or curb ramp structurally impracticable or technically infeasible;

c. Sidewalk, curb, and/or curb ramp construction would result in undesirable disruption of existing drainage patterns, or disturbance to or removal of natural features such as significant trees or other valuable and character-defining mature vegetation; or

d. Sidewalk, curb, and/or curb ramp construction would preclude vehicular access to the lot, for example on project sites where topography would render driveway access in excess of the maximum 15 percent slope.

3. Notwithstanding any provision of Section 23.76.026, the applicant for a Master Use Permit or a building permit to which ((~~the Land Use Code~~)) Title 23 in effect prior to October 30, 2009, applies may, by written election, use the exemptions in subsections 23.53.006.F.1 and 23.53.006.F.2.

Section 56. Section 23.53.025 of the Seattle Municipal Code, last amended by Ordinance 126682, is amended as follows:

23.53.025 Access easement standards

If access by easement has been approved by the Director, the easement shall meet the following standards. Surfacing of easements, pedestrian walkways required within easements, and turnaround dimensions shall meet the requirements of the Right-of-Way Improvements Manual.

A. Vehicle access easements serving one or two ((~~single-family~~)) dwelling units ((~~or one multifamily residential use with a maximum of two units~~)) shall meet the following standards:

1. Easement width shall be a minimum of 10 feet.

2. No maximum easement length shall be set. If easement length is more than 150 feet, a vehicle turnaround shall be provided.

3. ((~~Curbcut~~)) Curb cut width from the easement to the street shall be the minimum necessary for safety and access.

B. Vehicle access easements serving at least three but fewer than ((~~five single-family~~)) ten dwelling units shall meet the following standards:

1. Easement width shall be a minimum of 10 feet.

2. The easement shall provide a hard-surfaced roadway at least 10 feet wide.

3. No maximum easement length shall be set. If the easement is over 600 feet long, a fire hydrant may be required by the Director.

4. A turnaround shall be provided unless the easement extends from street to street.

5. ((~~Curbcut~~)) Curb cut width from the easement to the street shall be the minimum necessary for safety and access.

C. ((~~Vehicle access easements serving at least five but fewer than ten single-family dwelling units, or at least three but fewer than ten multifamily dwelling units~~

~~1. Easement width, surfaced width, length, turn around, and curbcut width shall be as required in subsection 23.53.025.B.~~

~~2. No single-family structure shall be closer than 5 feet to the easement, except that structural features allowed to extend into required yards under subsection 23.44.014.C.6 are also allowed to extend into the 5-foot setback from an easement.~~

~~D.~~)) Vehicle ((~~Access Easements Serving Ten~~)) access easements serving ten or more ((~~Residential Units.~~)) dwelling units shall meet the following standards:

1. Easement width shall be a minimum of 32 feet((~~;~~)) .

2. The easement shall provide a surfaced roadway at least 24 feet wide, except in the MPC-YT zone, where the minimum surfaced roadway width is 20 feet((~~;~~)) .

3. No maximum length shall be set. If the easement is over 600 feet long, a fire hydrant may be required by the Director((~~;~~)) .

4. A turnaround shall be provided unless the easement extends from street to street((~~;~~)) .

5. ((~~Curbcut~~)) Curb cut width from the easement to the street shall be the minimum necessary for safety access((~~;~~)) .

6. No ((~~single-family structure;~~)) detached dwelling unit shall be located closer than ((~~10~~)) 5 feet to an easement, except that architectural features such as cornices, eaves, gutters, roofs, fireplaces, chimneys, and other similar features shall not be located closer than 3 feet to a required easement.

7. One pedestrian walkway shall be provided, extending the length of the easement.

((~~E. Vehicle Access Easements Serving Nonresidential or Live-work Uses.~~

~~1.~~)) D. For nonresidential or live-work uses providing fewer than ten (((~~10~~))) parking spaces, the easement shall meet the requirements of subsection ((~~C~~)) 23.53.025.B.

((~~2~~)) E. For nonresidential or live-work uses providing ten (((~~10~~))) or more parking spaces, the easement shall meet the requirements of subsection ((~~D~~)) 23.53.025.C.

F. Pedestrian ((~~Access Easements~~)) access easements. Where a lot proposed for a residential use abuts an alley but does not abut a street and the provisions of the zone require access by vehicles from the alley, or where the alley access is an exercised option, an easement providing pedestrian access to a street from the lot shall be provided meeting the following standards:

1. Easement width shall be a minimum of ((~~five (~~)) 5 ((~~)~~)) feet;

2. Easements serving one ((~~(1)~~)) or two ((~~(2)~~)) dwelling units shall provide a paved pedestrian walkway at least ((~~three (~~)) 3 ((~~)~~)) feet wide;

3. Easements serving three ((~~(3)~~)) or more dwelling units shall provide a paved pedestrian walkway at least ((~~five (~~)) 5 ((~~)~~)) feet wide;

4. Easements over ((~~one hundred (~~)) 100 ((~~)~~)) feet in length shall provide lighting at intervals not to exceed ((~~fifty (~~)) 50 ((~~)~~)) feet. Lighting placement shall not exceed ((~~fifteen (~~)) 15 ((~~)~~)) feet in height;

5. Pedestrian access easements shall not exceed ((~~two hundred (~~)) 200 ((~~)~~)) feet in length.

G. Vertical ((~~Clearance Above Easements~~)) clearance above easements. When an easement serves fewer than ten ((~~(10)~~)) residential units and crosses a residentially zoned lot, portions of structures may be built over the easement provided that a minimum vertical clearance of ((~~sixteen and one-half (16 ½)~~)) 16.5 feet is maintained above the surface of the easement roadway and a minimum turning path radius in accordance with ((~~Section 23.54.030 C~~)) subsection 23.54.030.D is maintained. (((~~See~~)) Exhibit ((~~23.53.025 A~~)) A for 23.53.025.)

H. Exceptions ((~~From Access Easement Standards~~)) from access easement standards. The Director, in consultation with the Fire Chief, may modify the requirements for easement

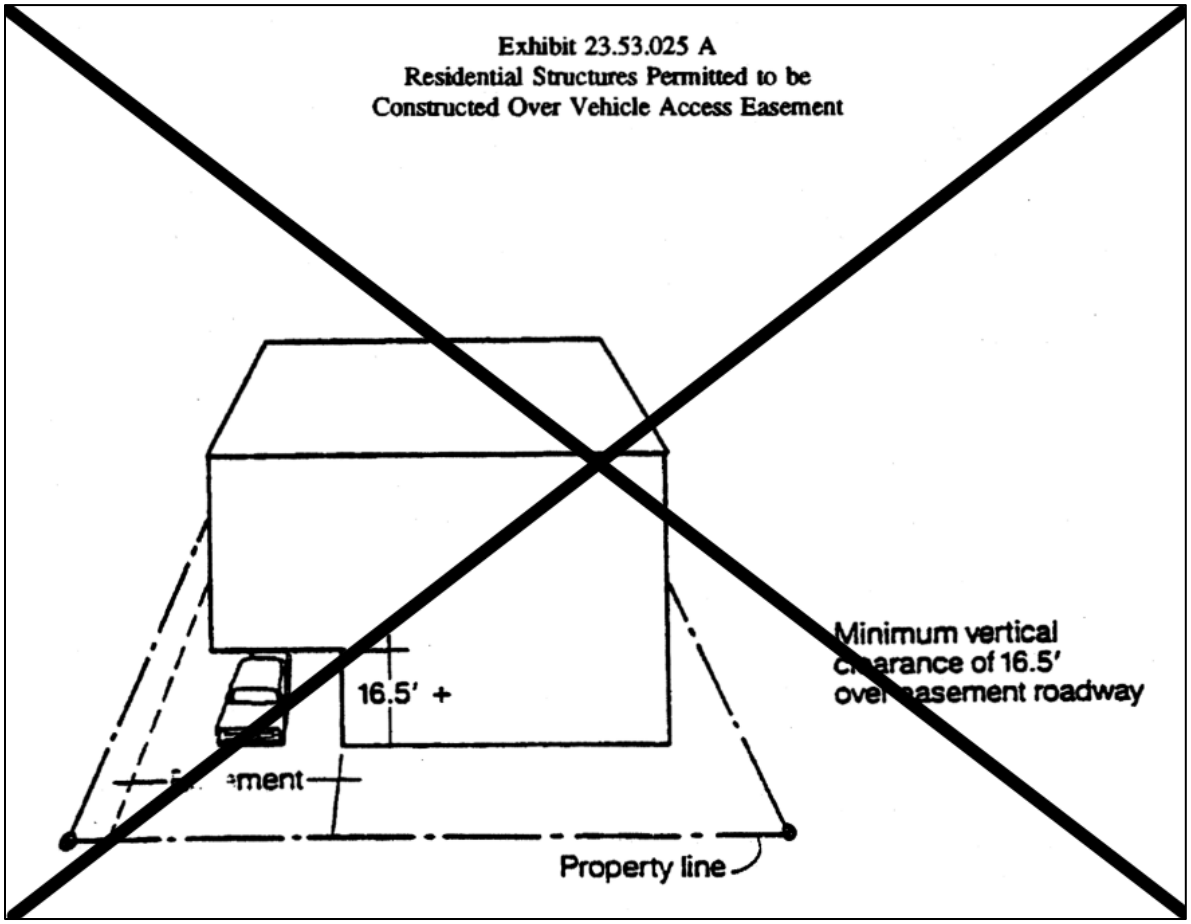
width and surfacing for properties located in environmentally critical areas or their buffers when it is determined that:

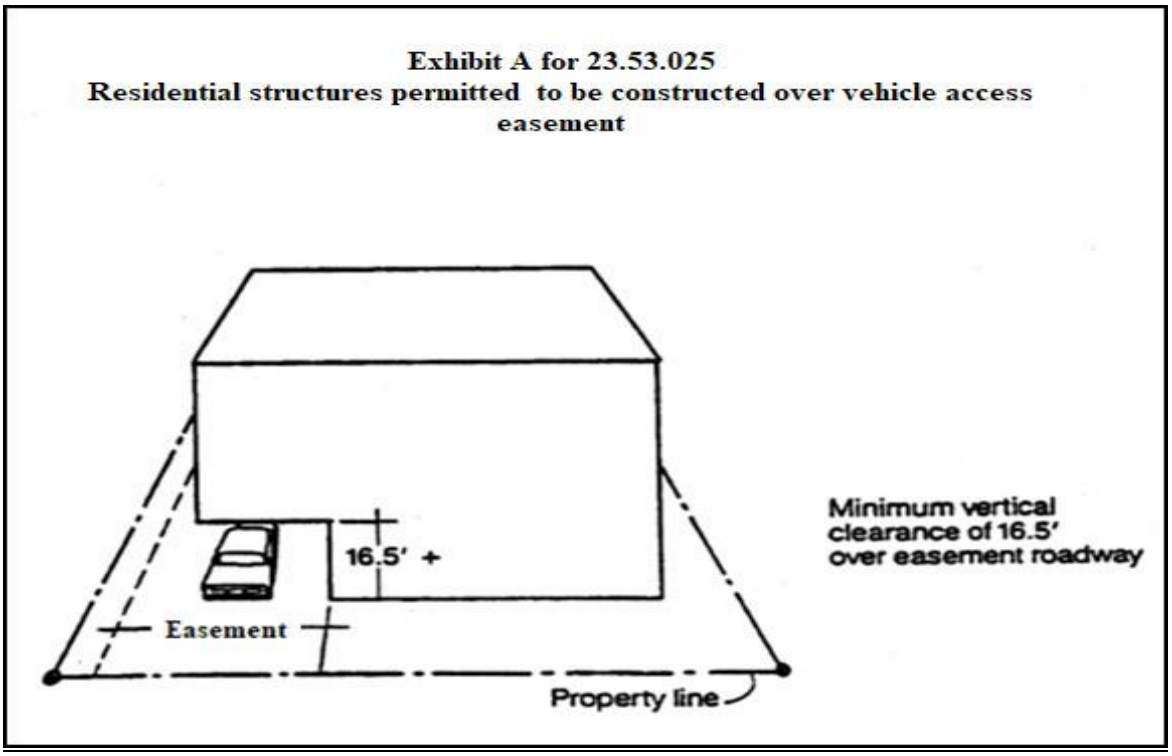
1. Such modification(s) would reduce adverse effects to identified environmentally critical areas or buffers; and

2. Adequate access and provisions for fire protection can be provided for structures served by the easement.

Exhibit A for 23.53.025

Residential structures permitted to be constructed over vehicle access easement





Section 57. Section 23.54.015 of the Seattle Municipal Code, last amended by Ordinance 127099, is amended as follows:

23.54.015 Required <u>vehicular</u> parking and maximum <u>vehicular</u> parking limits

A. Required parking. The minimum number of off-street motor vehicle parking spaces required for specific uses is set forth in Table A for 23.54.015 for ((~~non-residential~~)) <u>nonresidential</u> uses other than institutional uses, Table B for 23.54.015 for residential uses, and Table C for 23.54.015 for institutional uses, except as otherwise provided in this Chapter 23.54. Required parking is based upon gross floor area of a use within a structure minus gross floor area in parking uses, and the square footage of a use when located outside of an enclosed structure, or as otherwise specified. Maximum parking limits for specific uses and specific areas are set forth in subsection 23.54.015.C. Exceptions to motor vehicle parking requirements set forth in this Section 23.54.015 are provided in((:)) subsections 23.54.015.B and 23.54.015.C((;)) and in Section 23.54.020 ((~~unless otherwise specified~~)). This Chapter

23.54 does not apply to parking for construction activity, which is regulated by Section 23.42.044.

B. Required parking for specific zones and areas

1. Parking in downtown zones is regulated by Chapters 23.49 and 23.66, and not by this Section 23.54.015.

2. Parking in the MPC-YT zone is regulated by Section 23.75.180 and not by this Section 23.54.015.

3. Parking for major institution uses in the Major Institution Overlay District is regulated by Sections 23.54.015 and 23.54.016.

4. The Director shall adopt by rule a map of frequent transit and major transit service areas based on proximity to a transit station or stop served by a frequent transit route or a major transit service. The determination whether a proposed development site is in a scheduled frequent transit or major transit service area shall be based on the ((~~frequent transit service area~~)) map adopted by rule that exists on the date a project vests according to the standards of Section 23.76.026, provided that a rule that takes effect on a date after the project vests may be applied to determine whether the site is in a scheduled frequent transit or major transit service area, at the election of the project applicant in accordance with subsection 23.76.026.E.

C. Maximum parking limits for specific zones or areas

1. In the Stadium Transition Area Overlay District certain uses are subject to a maximum parking ratio pursuant to subsection 23.74.010.A.1.b. When there are multiple uses on a lot, the total parking requirement for all uses subject to a maximum ratio cannot exceed the aggregate maximum for those uses under Section 23.74.010.

2. In all commercial zones, except C2 zones outside of urban villages, no more than 145 spaces per lot may be provided as surface parking or as flexible-use parking.

3. In all Neighborhood Residential and multifamily zones, commercial uses are limited to no more than ten parking spaces per business establishment.

4. In the Northgate Overlay District, the Director may permit parking to exceed applicable maximum parking limits as a Type I decision pursuant to Chapter 23.76 if:

a. The parking is provided in a structure according to a joint-use parking agreement with King County Metro Transit; and

b. It can be demonstrated to the satisfaction of the Director through a parking demand study that the spaces are only needed to meet evening and weekend demand or as overflow on less than ten percent of the weekdays in a year, and the spaces shall otherwise be available for daytime use by the general public.

5. Notwithstanding the minimum parking requirements set out in Table A for 23.54.015, in the Industry and Innovation zones, the maximum parking ratio for all uses is one space per 1,000 square feet of gross floor area.

D. Parking waivers for ((~~non-residential~~)) nonresidential uses

1. In all commercial zones, no parking is required for the first 1,500 square feet of each business establishment or the first 15 fixed seats for motion picture and performing arts theaters.

2. In all other zones, no parking is required for the first 2,500 square feet of gross floor area of ((~~non-residential~~)) nonresidential uses in a structure, except for the following:

a. Structures or portions of structures occupied by restaurants with drive-in lanes((~~,~~)) ;

b. Motion picture theaters((~~,~~)) ;

c. Offices((~~,~~)) ; or

d. Institution uses, including Major Institution uses.

When two or more uses with different parking ratios occupy a structure, the 2,500 square foot waiver is prorated based on the area occupied by the ((~~non-residential~~)) nonresidential uses for which the parking waiver is permitted.

E. Fleet vehicles. Notwithstanding any other provisions of this ((~~section~~)) Section 23.54.015, off-street parking shall be provided for all fleet vehicles and those parking spaces will not be counted toward the parking requirements of Table A for 23.54.015, Table B for 23.54.015, or Table C for 23.54.015.

F. Use and reuse of schools. For non-school uses permitted to locate in a former or existing public school, parking requirements will be determined by school use pursuant to criteria adopted according to Chapter 23.78((~~, Establishment of Criteria for Joint Use or Reuse of Schools~~)).

G. New ((~~non-residential~~)) nonresidential uses in existing structures in commercial and industrial zones. Up to 20 required parking spaces are waived for a new ((~~non-residential~~)) nonresidential use established in an existing structure or the expansion of an existing ((~~non-residential~~)) nonresidential use entirely within an existing structure. Existing required parking shall remain. For purposes of this Section 23.54.015, "existing structure" means a structure that was established under permit, or for which a building permit has been granted and has not expired, at least two years prior to the application to establish the new use or expand the use.

Parking spaces required for loading and unloading of passengers are not eligible for the waiver under this subsection 23.54.015.G.

H. Uses not shown on parking tables. In the case of a use not shown on Table A for 23.54.015, Table B for 23.54.015, or Table C for 23.54.015, the requirements for off-street parking will be determined by the Director based on the requirements for the most comparable use. Where, in the judgment of the Director, none of the uses on Table A for 23.54.015, Table B for 23.54.015, and Table C for 23.54.015 are comparable to a proposed use, the Director may base ((~~his or her~~)) a determination as to the amount of parking required for the proposed use on detailed information provided by the applicant. The information required may include, but not be limited to, a description of the physical structure(s), identification of potential users, and analysis of likely parking demand.

I. Uses in multiple parking table categories. If an entire use or structure, or the same portion of a use or structure, falls under more than one category in Table A for 23.54.015, Table B for 23.54.015, or Table C for 23.54.015 then, unless otherwise specified, the category requiring the smallest number of parking spaces applies except as expressly set forth on such tables.

J. Existing parking deficits. Existing legal parking deficits of legally established uses are allowed to continue even if a change of use occurs. This subsection 23.54.015.J will not be construed to permit a parking deficit caused by the failure to satisfy conditions of a reduced parking requirement for any use or structure.

Table A for 23.54.015
Required parking for ((~~non-residential~~)) nonresidential uses other than institutions

Use				Minimum parking required
I. General ((~~non-residential~~)) nonresidential uses (other than institutions)				
* * *				
B.	COMMERCIAL USES			
	B.1.	Animal shelters and kennels		1 space for each 2,000 square feet
	B.2.	Eating and drinking establishments		1 space for each 250 square feet
	B.3.	Entertainment uses, general, except as noted below [2]		For public assembly areas: 1 space for each 8 fixed seats, or 1 space for each 100 square feet of public assembly area not containing fixed seats
		B.3.a.	Adult cabarets	1 space for each 250 square feet
		B.3.b.	Sports and recreation uses [3]	1 space for each 500 square feet
	B.4.	Food processing and craft work		1 space for each 2,000 square feet
	B.5.	Laboratories, research and development		1 space for each 1,500 square feet
	B.6.	Lodging uses		1 space for each 4 rooms; For bed and breakfast facilities in ((~~neighborhood residential~~)) Neighborhood Residential and multifamily zones, 1 space for each dwelling unit, plus 1 space for each 2 guest rooms
	B.7.	Medical services		1 space for each 500 square feet
	B.8.	Offices		1 space for each 1,000 square feet
	B.9.	Sales and services, automotive		1 space for each 2,000 square feet

Table A for 23.54.015
Required parking for ((~~non-residential~~)) nonresidential uses other than institutions

Use				Minimum parking required
	B.10.	Sales and services, general, except as noted below		1 space for each 500 square feet
		B.10.a.	Pet daycare centers [4]	1 space for each 10 animals or 1 space for each staff member, whichever is greater, plus 1 loading and unloading space for each 20 animals
	B.11.	Sales and services, heavy		1 space for each 2,000 square feet
	B.12.	Sales and services, marine		1 space for each 2,000 square feet
* * *				
II. ((~~Non-residential~~)) Nonresidential use requirements for specific areas				
I.	((~~Non-residential~~)) Nonresidential uses in urban centers or the Station Area Overlay District [5]			No minimum requirement
J.	((~~Non-residential~~)) Nonresidential uses in urban villages that are not within an urban center or ((~~the~~)) a Station Area Overlay District, if the ((~~non-residential~~)) nonresidential use is located within a frequent transit service area [5]			No minimum requirement
K.	((~~Non-residential~~)) Nonresidential uses permitted in MR and HR zones pursuant to Section 23.45.504			No minimum requirement
L.	((~~Non-residential~~)) Nonresidential uses permitted in II zones			No minimum requirement

Footnotes for Table A for 23.54.015
[1] No parking is required for urban farms or community gardens in residential zones.
[2] Required parking for spectator sports facilities or exhibition halls must be available when the facility or exhibition hall is in use. A facility shall be considered to be "in use" during

Table A for 23.54.015
Required parking for ((~~non-residential~~)) nonresidential uses other than institutions

Use	Minimum parking required
the period beginning three hours before an event is scheduled to begin and ending one hour after a scheduled event is expected to end. For sports events of variable or uncertain duration, the expected event length shall be the average length of the events of the same type for which the most recent data are available, provided it is within the past five years. During an inaugural season, or for nonrecurring events, the best available good faith estimate of event duration will be used. A facility will not be deemed to be "in use" by virtue of the fact that administrative or maintenance personnel are present. The Director may reduce the required parking for any event when projected attendance for a spectator sports facility is certified to be 50 percent or less of the facility's seating capacity, to an amount not less than that required for the certified projected attendance, at the rate of one space for each ten fixed seats of certified projected attendance. An application for reduction and the certification shall be submitted to the Director at least 15 days prior to the event. When the event is one of a series of similar events, such certification may be submitted for the entire series 15 days prior to the first event in the series. If the Director finds that a certification of projected attendance of 50 percent or less of the seating capacity is based on satisfactory evidence such as past attendance at similar events or advance ticket sales, the Director shall, within 15 days of such submittal, notify the facility operator that a reduced parking requirement has been approved, with any conditions deemed appropriate by the Director to ensure adequacy of parking if expected attendance should change. The parking requirement reduction may be applied for only if the goals of the facility's Transportation Management Plan are otherwise being met. The Director may revoke or modify a parking requirement reduction approval during a series, if projected attendance is exceeded. [3] For indoor sports and recreation uses that exceed 25,000 square feet in size in a Manufacturing Industrial Center, the minimum requirement is ((~~1~~)) one space for each 2,000 square feet. [4] The amount of required parking is calculated based on the maximum number of staff or animals the center is designed to accommodate. [5] The general minimum requirements of Part I of Table A for 23.54.015 are superseded to the extent that a use, structure, or development qualifies for either a greater or a lesser minimum parking requirement (which may include no requirement) under any other provision. To the extent that a ((~~non-residential~~)) nonresidential use fits within more than one line in Table A for 23.54.015, the least of the applicable minimum parking requirements applies. The different parking requirements listed for certain categories of ((~~non-residential~~)) nonresidential uses shall not be construed to create separate uses for purposes of any requirements related to establishing or changing a use under this Title 23.	

Table B for 23.54.015 **Required parking for residential uses**		
Use		**Minimum parking required**
I. General residential uses [1, 2, 3]		
((~~A.~~	~~Adult family homes~~	~~1 space for each dwelling unit~~
~~B.~~)) A.	Artist's studio/dwellings	1 space for each 2 dwelling units
((~~C.~~)) B.	Assisted living facilities	1 space for each 4 assisted living units; plus 1 space for each 2 staff members on-site at peak staffing time; plus 1 barrier-free passenger loading and unloading space
((~~D.~~)) C.	Caretaker's quarters	1 space for each 2 dwelling units
((~~E.~~)) D.	Congregate residences	1 space for each 4 sleeping rooms
((~~F.~~	~~Cottage housing developments~~ [1]	~~1 space for each dwelling unit~~
~~G.~~	~~Floating homes~~	~~1 space for each dwelling unit~~
~~H.~~)) E.	Mobile home parks	1 space for each 2 mobile home lots as defined in Chapter 22.904
((~~I.~~	~~Multifamily residential uses, except as otherwise provided in this Table B for 23.54.015~~ [1, 2]	~~1 space per dwelling unit, or 1 space for each 2 small efficiency dwelling units~~
~~J.~~	~~Nursing homes~~	~~1 space for each 2 staff doctors; plus 1 additional space for each 3 employees; plus 1 space for each 6 beds~~
~~K.~~)) F.	((~~Single-family dwelling units~~)) Housing [((~~1, 3~~))] [4, 5]	1 space for each 2 dwelling units

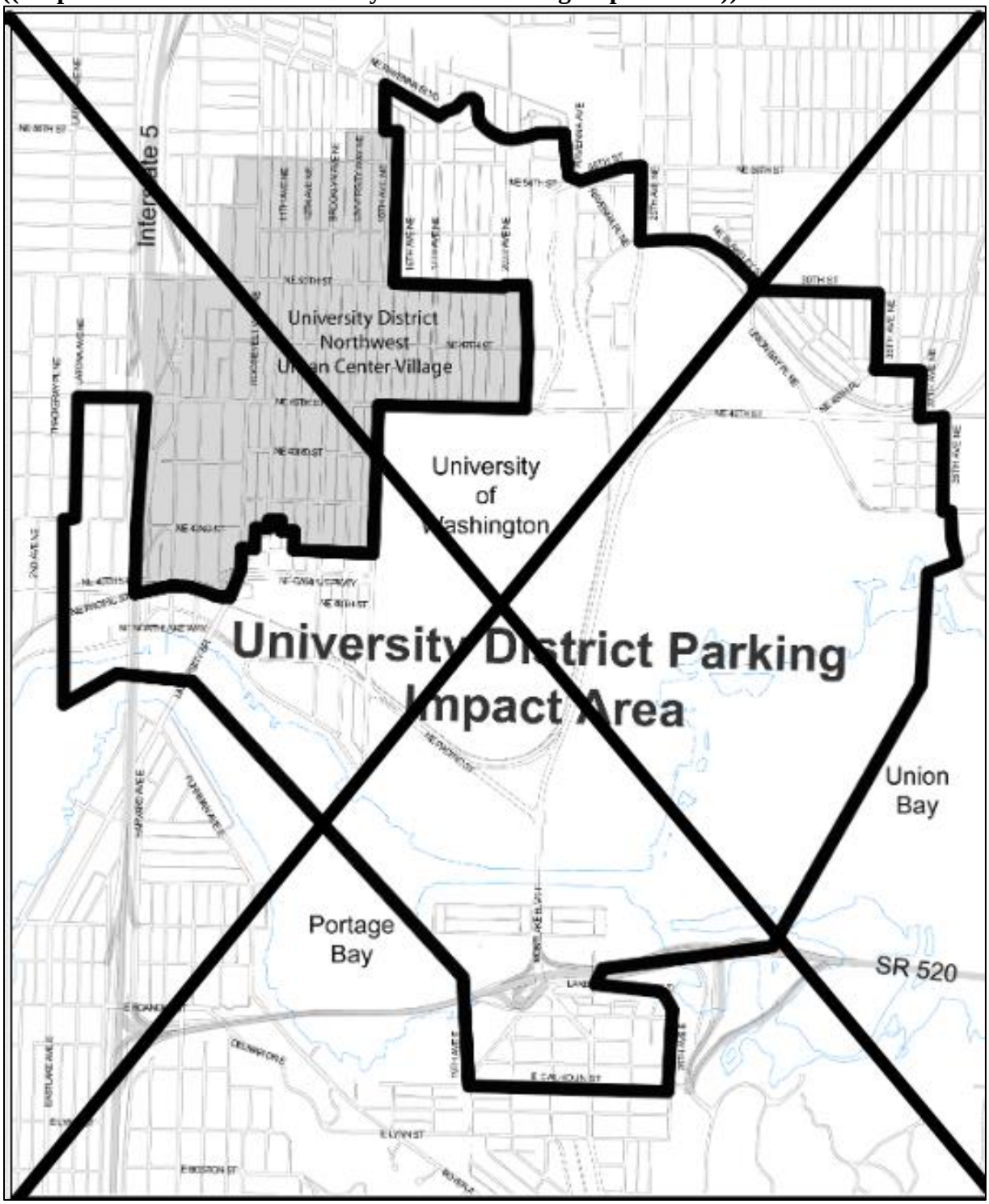
Table B for 23.54.015 **Required parking for residential uses**		
Use		**Minimum parking required**
II. Residential use requirements for specific areas [1]		
((~~L.~~)) G.	All residential uses within urban centers or within ((~~the~~)) a Station Area Overlay District ((2))	No minimum requirement
((~~M.~~)) H.	All residential uses ((~~in commercial, RSL, and multifamily zones~~)) within urban villages that are not within an urban center or ((~~the~~)) a Station Area Overlay District((~~,~~)) if the residential use is located within a frequent transit or major transit service area ((~~2, 4~~))	No minimum requirement
I.	All residential uses within a major transit service area	No minimum requirement
((~~N.~~	~~Multifamily residential uses within the University of Washington parking impact area shown on Map A for 23.54.015~~ [2]	~~1 space per dwelling unit for dwelling units with fewer than 2 bedrooms; plus 1.5 spaces per dwelling units with 2 or more bedrooms; plus 0.25 spaces per bedroom for dwelling units with 3 or more bedrooms~~
~~O.~~	~~Multifamily dwelling units, within the Alki area shown on Map B for 23.54.015~~ [2]	~~1.5 spaces for each dwelling unit~~))
~~P.~~)) J.	Congregate residences located within ((~~one-half mile walking distance of a major transit stop~~)) a frequent transit service area	No minimum requirement

Footnotes to Table B for 23.54.015
[1] ((~~For each moderate-income unit and each low-income unit, no minimum amount of parking is required.~~
~~2~~)) The minimum amount of parking prescribed by Part I of Table B for 23.54.015 does not apply if a use, structure, or development qualifies for a ((~~greater or a~~)) lesser amount of minimum parking, including no parking, under any other provision of this Section

Table B for 23.54.015
Required parking for residential uses

Use	Minimum parking required
23.54.015. If more than one provision in this Table B for 23.54.015 is applicable, the provision requiring the least amount of minimum parking applies((~~, except that if item O in Part II of Table B for 23.54.015 applies, it shall supersede any other requirement in Part I or Part II of this Table B for 23.54.015~~)). [2] For each moderate-income unit and each low-income unit, no minimum amount of parking is required. [3] A reduction or waiving of parking requirements may be permitted if the Director finds that the reduction or waiver is necessary in order to protect a Tier 2 or Tier 3 tree as defined in Chapter 25.11. [4] No parking is required for ((~~single-family residential uses~~)) accessory dwelling units. [5] No parking is required for principal dwelling units on lots in any residential zone that are less than 3,000 square feet in size or less than 30 feet in width where access to parking is permitted through a required ((~~yard or~~)) setback abutting a street according to the standards of subsections ((~~23.44.016.B.2~~)) 23.44.160.F.2, 23.45.536.C.2, or 23.45.536.C.3. ((~~4 Except as provided in Footnote 4, the minimum amounts of parking prescribed by Part 1 of Table B for 23.54.015 apply within 1,320 feet of the Fauntleroy Ferry Terminal.~~))	

((~~Map A for 23.54.015: University District Parking Impact Area~~))



((~~Map B for 23.54.015: Alki Area Parking Overlay~~))

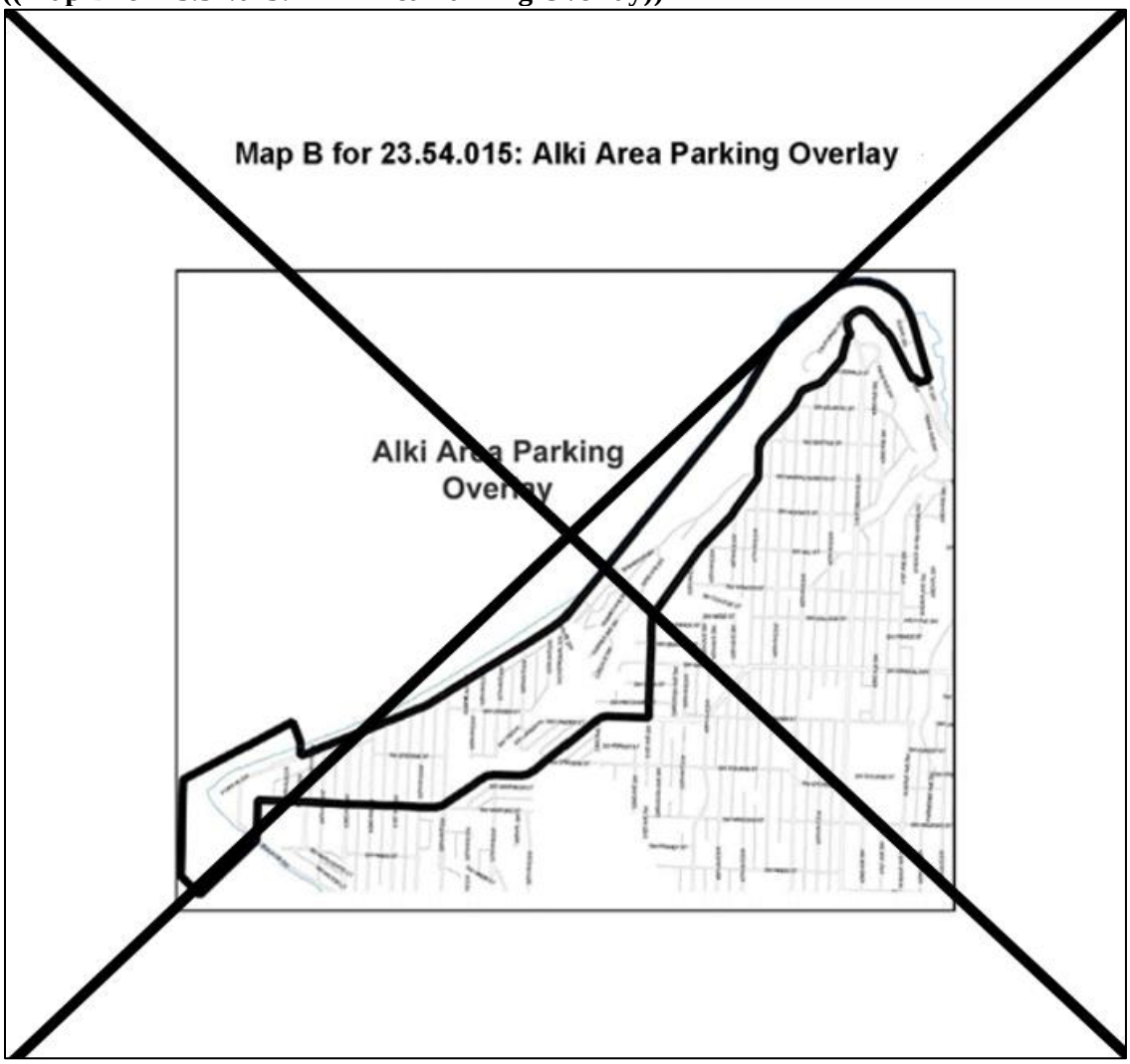


Table C for 23.54.015
Required parking for public uses and institutions

Use		Minimum parking required
I. General public uses and institutions [1]		
A.	Adult care centers ((~~1~~)) [2, 3]	1 space for each 10 adults (clients) or 1 space for each staff member, whichever is greater; plus 1 loading and unloading space for each 20 adults (clients)

Table C for 23.54.015
Required parking for public uses and institutions

Use		Minimum parking required
B.	Child care centers [2, 3, 4, 5 ((12))]	1 space for each 10 children or 1 space for each staff member, whichever is greater; plus 1 loading and unloading space for each 20 children
C.	Colleges	A number of spaces equal to 15 percent of the maximum number of students that the facility is designed to accommodate; plus 30 percent of the number of employees the facility is designed to accommodate; plus 1 space for each 100 square feet of spectator assembly area in outdoor spectator sports facilities
D.	Community centers owned and operated by the Seattle Department of Parks and Recreation (SPR) [((1,)) 6]	1 space for each 555 square feet; or for family support centers, 1 space for each 100 square feet
E.	Community clubs((,)) and community centers not owned and operated by SPR [((1, 5,)) 7, 8]	1 space for each 80 square feet of floor area of all auditoria and public assembly rooms containing fixed seats; plus 1 space for each 350 square feet of all other indoor areas
F.	Community farms [((5)) 8]	1 space plus 1 space for each 10,000 square feet of site area, or 10 spaces, whichever is less
G.	Hospitals	1 space for each 2 staff doctors; plus 1 additional space for each 5 employees other than staff doctors; plus 1 space for each 6 beds
((H.	Institutes for advanced study, except in neighborhood residential zones	1 space for each 1,000 square feet of offices and similar spaces; plus 1 space for each 10 fixed seats in all auditoria and public assembly rooms; or 1 space for each 100

Table C for 23.54.015
Required parking for public uses and institutions

Use		Minimum parking required
		~~square feet of public assembly area not containing fixed seats~~))
((~~I.~~)) H.	Institutes for advanced study in ((~~neighborhood residential~~)) Neighborhood Residential zones (existing) [1]	3.5 spaces for each 1,000 square feet of office space; plus 10 spaces for each 1,000 square feet of additional building footprint to house and support conference center activities; or 37 spaces for each 1,000 square feet of conference room space, whichever is greater
((~~J.~~)) I.	Libraries ((~~1, 5,~~)) 8, 9	1 space for each 80 square feet of floor area of all auditoria and public meeting rooms containing fixed seats; plus 1 space for each 500 square feet of floor area of all other areas
((~~K.~~)) J.	Museums ((~~1~~))	1 space for each 80 square feet of all auditoria and public assembly rooms, not containing fixed seats; plus 1 space for every 10 fixed seats for floor area containing fixed seats; plus 1 space for each 250 square feet of other gross floor area open to the public
((~~L.~~)) K.	Private clubs	1 space for each 80 square feet of floor area of all auditoria and public assembly rooms not containing fixed seats; or 1 space for every 8 fixed seats for floor area containing fixed seats; or if no auditorium or assembly room, 1 space for each 350 square feet, excluding ball courts
((~~M.~~)) L.	Religious facilities ((~~1~~))	1 space for each 80 square feet of all auditoria and public assembly rooms
((~~N.~~	~~Schools, private elementary and secondary~~ ((~~1~~))	~~1 space for each 80 square feet of all auditoria and public assembly rooms, or if~~

Table C for 23.54.015
Required parking for public uses and institutions

Use		Minimum parking required
		~~no auditorium or assembly room, 1 space for each staff member~~
~~O.~~)) <u>M.</u>	Schools, ((~~public~~)) elementary and secondary [7, ((~~9,~~)) 10, <u>11</u>]	1 space for each 80 square feet of all auditoria ((~~or~~)) <u>and</u> public assembly rooms <u>without fixed seats</u>, or 1 space for every 8 fixed seats in auditoria or public assembly rooms containing fixed seats((~~, for new public schools on a new or existing public school site~~
~~P.~~)) <u>N.</u>	Vocational or fine arts schools	1 space for each 2 faculty that the facility is designed to accommodate; plus 1 space for each 2 full-time employees other than faculty that the facility is designed to accommodate; plus 1 space for each 5 students, based on the maximum number of students that the school is designed to accommodate
II. General public uses and institutions for specific areas		
((~~Q.~~)) <u>O.</u>	General public uses, institutions and Major Institution uses, except hospitals, in urban centers or the Station Area Overlay District [((~~11~~)) <u>12</u>]	No minimum requirement
((~~R.~~)) <u>P.</u>	General public uses and institutions, except hospitals, including institutes for advanced study in ((~~neighborhood residential~~)) <u>Neighborhood Residential</u> zones, within urban villages that are not within the Station Area Overlay	No minimum requirement

Table C for 23.54.015
Required parking for public uses and institutions

Use		Minimum parking required
	District, if the use is located within a frequent transit service area	

Footnotes to Table C for 23.54.015

[1] ((~~When this use is permitted in a neighborhood residential zone as a conditional use, the~~)) The Director may modify the parking requirements in this Table A for 23.54.015 for institutions in Neighborhood Residential and multifamily zones pursuant to the conditional uses provisions in Section ((~~23.44.022~~)) 23.44.030 ((~~; when the use is permitted in a multifamily zone as a conditional use, the Director may modify the parking requirements pursuant to~~)) and Section 23.45.570.

[2] The amount of required parking is calculated based on the maximum number of staff, children, or clients that the center is designed to accommodate on site at any one time.

[3] As a Type I decision, the Director, in consultation with the Director of the Seattle Department of Transportation, may allow adult care and child care centers to provide loading and unloading spaces on street, if not prevented by current or planned transportation projects adjacent to their property, when no other alternative exists.

[4] A child care facility, when co-located with an assisted living facility, may count the passenger load/unload space required for the assisted living facility toward its required passenger load/unload spaces.

[5] ((~~When this use is permitted outright in a neighborhood residential or multifamily zone, the Director may reduce the parking and loading requirements of Section 23.54.015 and the requirements of Section 23.44.016 or Section 23.45.536 on a case-by-case basis if the applicant can demonstrate that the modification is necessary due to the specific features, activities, or programs of the institution and links the reduction to the features of the institution that justify the reduction. Such modifications shall be valid only under the conditions specified, and if those conditions change, the standard requirement shall be satisfied.~~)) The Director may reduce the minimum parking requirements for a child care center in any zone if a portion of its parking demand can be accommodated in nearby on-street parking.

[6] When family support centers are located within community centers owned and operated by the Department of Parks and Recreation, the Director may lower the combined parking requirement by up to a maximum of 15 percent, pursuant to subsection 23.54.020.I.

[7] Indoor gymnasiums are not considered ball courts, nor are they considered auditoria or public assembly rooms unless they contain bleachers (fixed seats). If the gymnasium contains bleachers, the parking requirement for the gymnasium is one

Table C for 23.54.015
Required parking for public uses and institutions

Use	Minimum parking required
parking space for every eight fixed seats. Each 20 inches of width of bleachers is counted as one fixed seat for the purposes of determining parking requirements. If the gymnasium does not contain bleachers and is in a school, there is no parking requirement for the gymnasium. If the gymnasium does not contain bleachers and is in a community center, the parking requirement is one space for each 350 square feet. [8] The Director may reduce the parking and loading requirements of Section 23.54.015 and the requirements of Section 23.44.080 or Section 23.45.536 on a case-by-case basis if the applicant can demonstrate that the modification is necessary due to the specific features, activities, or programs of the institution and links the reduction to the features of the institution that justify the reduction. Such modifications shall be valid only under the conditions specified, and if those conditions change, the standard requirement shall be satisfied. [9] When a library is permitted in a multifamily or commercial zone as a conditional use, the Director may modify the parking requirements of Section 23.54.015 and the requirements of Section 23.45.536 or Sections 23.47A.030 and 23.47A.032 on a case-by-case basis if the applicant can demonstrate that the modification is necessary due to the specific features, activities, or programs of the institution and links the reduction to the features of the institution that justify the reduction. Such modifications shall be valid only under the conditions specified, and if those conditions change, the standard requirement shall be satisfied. ((~~9~~)) [10] For public schools, when an auditorium or other place of assembly is demolished and a new one built in its place, parking requirements are determined based on the new construction. When an existing public school on an existing public school site is remodeled, additional parking is required if any auditorium or other place of assembly is expanded or additional fixed seats are added. Additional parking is required as shown in this Table C for 23.54.015 for the increase in floor area or increase in number of seats only. If the parking requirement for the increased area or seating is ((~~10~~)) ten percent or less than that for the existing auditorium or other place of assembly, then no additional parking is required. ((~~10~~)) [11] ((~~Development~~)) For public schools, development standard departures may be granted or required pursuant to the procedures and criteria set forth in Chapter 23.79 to reduce the required or permitted number of parking spaces. ((~~11~~)) [12] The general requirements of lines A through P of this Table C for 23.54.015 for general public uses and institutions, and requirements of subsection 23.54.016.B for Major Institution uses, are superseded to the extent that a use, structure, or development qualifies for either a greater or a lesser parking requirement (which may include no requirement) under any other provision. To the extent that a general public use, institution, or Major Institution use fits within more than one line in this	

Table C for 23.54.015 **Required parking for public uses and institutions**	
Use	**Minimum parking required**
Table C for 23.54.015, the least of the applicable parking requirements applies. The different parking requirements listed for certain categories of general public uses or institutions shall not be construed to create separate uses for purposes of any requirements related to establishing or changing a use under this Title 23. ((~~12 The Director may reduce the minimum parking requirements for a child care center in any zone if a portion of its parking demand can be accommodated in nearby on-street parking.~~))	

((~~K. Bicycle parking.~~))

23.54.037 Bicycle parking

A. Number of spaces

1. The minimum number of parking spaces for bicycles required for specified uses is set forth in Table ((~~D for 23.54.015~~)) A for 23.54.037.

2. Long-term parking for bicycles shall be for bicycles parked four or more hours. Short-term parking for bicycles shall be for bicycles parked less than four hours. In the case of a use not shown on Table ((~~D for 23.54.015~~)) A for 23.54.037, one bicycle parking space per 10,000 gross square feet of either short- or long-term bicycle parking is required((~~, except single-family residential use is exempt from bicycle parking requirements~~)) .

3. The minimum requirements are based upon gross floor area of the use in a structure minus gross floor area in parking uses, or the square footage of the use when located outside of an enclosed structure, or as otherwise specified.

((~~1.~~)) 4. Rounding. For long-term bicycle parking, calculation of the minimum requirement shall round up the result to the nearest whole number. For short-term bicycle

parking, calculation of the minimum requirement shall round up the result to the nearest whole even number.

((~~2.~~)) B. Performance standards. Provide bicycle parking in a highly visible, safe, and convenient location, emphasizing user convenience and theft deterrence, based on rules promulgated by the Director of the Seattle Department of Transportation that address the considerations in this subsection ((~~23.54.015.K.2~~)) 23.54.037.B.

((~~a.~~)) 1. Provide secure locations and arrangements of long-term bicycle parking, with features such as locked rooms or cages and bicycle lockers. The bicycle parking should be installed in a manner that avoids creating conflicts with automobile accesses and driveways.

((~~b.~~)) 2. For a garage with bicycle parking and motor vehicle parking for more than two dwelling units, provide pedestrian and bicycle access to long-term bicycle parking that is separate from other vehicular entry and egress points or uses the same entry or egress point but has a marked walkway for pedestrians and bicyclists.

((~~c.~~)) 3. Provide adequate lighting in the bicycle parking area and access routes to it.

((~~d.~~)) 4. If short-term bicycle parking facilities are not clearly visible from the street or sidewalk or adjacent on-street bicycle facilities, install directional signage in adequate amounts and in highly visible locations in a manner that promotes easy wayfinding for bicyclists.

((~~e.~~)) 5. Provide signage to long-term bicycle parking that is oriented to building users.

((~~f.~~)) 6. Long-term bicycle parking shall be located where bicyclists are not required to carry bicycles on exterior stairs with more than five steps to access the parking. The Director, as a Type I decision, may allow long-term bicycle parking for rowhouse and townhouse development to be accessed by stairs with more than five steps, if the slope of the lot makes access with five or fewer steps infeasible.

((~~g.~~)) 7. Where practicable, long-term bicycle parking shall include a variety of rack types to accommodate different types of bicycles.

((~~h.~~)) 8. Install bicycle parking hardware so that it can perform to its manufacturer's specifications and any design criteria promulgated by the Director of the Seattle Department of Transportation, allowing adequate clearance for bicycles and their riders.

((~~i.~~)) 9. Provide full weather protection for all required long-term bicycle parking.

((~~3.~~)) C. Location of bicycle parking

((~~a.~~)) 1. Long-term bicycle parking required for residential uses shall be located on-site except as provided in subsection ((~~23.54.015.K.3.c~~)) 23.54.037.C.3.

((~~b.~~)) 2. Short-term bicycle parking may be provided on the lot or in an adjacent right-of-way, subject to approval by the Director of the Seattle Department of Transportation, or as provided in subsection ((~~23.54.015.K.3.c~~)) 23.54.037.C.3.

((~~c.~~)) 3. Both long-term and short-term bicycle parking for residential uses may be provided off-site if within 600 feet of the residential use to which the bicycle parking is accessory and if the site of the bicycle parking is functionally interrelated to the site of the residential use to which the bicycle parking is accessory, such as within a unit lot subdivision

or if the sites are connected by access easements, or if a covenant or similar property right is established to allow use of the off-site bicycle parking.

((~~4.~~)) D. Long-term bicycle parking required for small efficiency dwelling units and congregate residence sleeping rooms is required to be covered for full weather protection. If the required, covered long-term bicycle parking is located inside the building that contains small efficiency dwelling units or congregate residence sleeping rooms, the space required to provide the required long-term bicycle parking shall be exempt from floor area ratio (FAR) limits. Covered long-term bicycle parking that is provided beyond the required bicycle parking shall not be exempt from FAR limits.

((~~5.~~)) E. Bicycle parking facilities shared by more than one use are encouraged.

((~~6.~~)) F. Except as provided in subsection ((~~23.54.015.K.7~~)) 23.54.015.G, bicycle parking facilities required for ((~~non-residential~~)) nonresidential uses shall be located:

((~~a.~~)) 1. On the lot; or

((~~b.~~)) 2. For a functionally interrelated campus containing more than one building, in a shared bicycle parking facility within 600 feet of the lot; or

((~~c.~~)) 3. Short-term bicycle parking may be provided in an adjacent right-of-way, subject to approval by the Director of the Seattle Department of Transportation.

((~~7.~~)) G. For ((~~non-residential~~)) nonresidential uses on a functionally interrelated campus containing more than one building, both long-term and short-term bicycle parking may be located in an off-site location within 600 feet of the lot, and short-term public bicycle parking may be provided in a right-of-way, subject to approval by the Director of the Seattle Department of Transportation. The Director of the Seattle Department of Transportation may

consider whether bicycle parking in the public place shall be sufficient in quality to effectively serve bicycle parking demand from the site.

((~~8.~~)) H. Bicycle commuter shower facilities. Structures containing 100,000 square feet or more of office use floor area shall include shower facilities and clothing storage areas for bicycle commuters. Two showers shall be required for every 100,000 square feet of office use. They shall be available in a manner that results in equal shower access for all users. The facilities shall be for the use of the employees and occupants of the building, and shall be located where they are easily accessible to bicycle parking facilities, which may include in places accessible by elevator from the bicycle parking location.

((~~9.~~)) I. Bicycle parking spaces within dwelling units or on balconies do not count toward the bicycle parking requirement, except if the bike parking spaces are located:

((~~a.~~)) 1. In a private garage; or

((~~b.~~)) 2. Within the ground floor of a dwelling unit in ((~~a townhouse or rowhouse development~~)) an attached dwelling unit.

Table ((~~D for 23.54.015~~)) A for 23.54.037
Parking for bicycles [1]

((~~USE~~)) Use		**Bike parking requirements**	
		Long-term	**Short-term**
* * *			
D. RESIDENTIAL USES [3]			
D.1	Assisted living facility	None	None
((~~D.1~~)) D.2	Congregate residences [4, 5]	1 per 4 sleeping rooms	1 per 80 sleeping rooms. 2 spaces minimum

Table ((~~D for 23.54.015~~)) A for 23.54.037
Parking for bicycles [1]

((~~USE~~)) Use		Bike parking requirements	
		Long-term	**Short-term**
((~~D.2~~	~~Multifamily structures other than townhouse and rowhouse developments~~ [4, 5]	~~1 per dwelling unit~~	~~1 per 20 dwelling units~~
~~D.3~~	~~Single-family residences~~	~~None~~	~~None~~
~~D.4~~	~~Townhouse and rowhouse developments~~ [5]	~~1 per dwelling unit~~	~~None~~))
D.3	Permanent supportive housing	None	None
D.4	Other residential uses [4, 5]	1 per dwelling unit [6]	1 per 20 dwelling units, except none for projects with less than 20 dwelling units
E. TRANSPORTATION FACILITIES			
E.1((.))	Park and ride facilities on surface parking lots	At least 20 ((~~(6)~~)) 7	At least 10
E.2((.))	Park and ride facilities in parking garages	At least 20 if parking is the principal use of a property; zero if non-parking uses are the principal use of a property	At least 10 if parking is the principal use of a property; zero if non-parking uses are the principal use of a property
E.3((.))	Flexible-use parking garages and flexible-use parking surface lots	1 per 20 auto spaces	None
E.4((.))	Rail transit facilities and passenger terminals	Spaces for 5 percent of projected AM	Spaces for 2 percent of projected AM

Table ((~~D for 23.54.015~~)) A for 23.54.037
Parking for bicycles [1]

((~~USE~~)) Use		**Bike parking requirements**	
		Long-term	**Short-term**
		peak period daily ridership ((~~6~~)) 7	peak period daily ridership

Footnotes to Table ((~~D for 23.54.015~~)) A for 23.54.037

[1] Required bicycle parking includes long-term and short-term amounts shown in this Table ((~~D for 23.54.015~~)) A for 23.54.037.

[2] The Director may reduce short-term bicycle parking requirements for theaters and spectator sport facilities that provide bicycle valet services authorized through a Transportation Management Program. A bicycle valet service is a service that allows bicycles to be temporarily stored in a secure area, such as a monitored bicycle corral.

[3] For residential uses, after the first 50 spaces for bicycles are provided, additional spaces are required at three-quarters the ratio shown in this Table ((~~D for 23.54.015~~)) A for 23.54.037.

[4] For ((~~congregate residences or multifamily~~)) residential structures that are owned and operated by a not-for-profit entity serving seniors or persons with disabilities, or that are licensed by the State and provide supportive services for seniors or persons with disabilities, as a Type I decision, the Director shall have the discretion to reduce the amount of required bicycle parking to as few as zero if it can be demonstrated that residents are less likely to travel by bicycle.

[5] In low-income housing, there is no minimum required long-term bicycle parking requirement for each unit subject to affordability limits no higher than 30 percent of median income and long-term bicycle parking requirements may be waived by the Director as a Type I decision for each unit subject to affordability limits greater than 30 percent of median income and no higher than 80 percent of median income if a reasonable alternative is provided (e.g., in-unit vertical bike storage).

[6] Long-term bike parking is not required in NR zones.

((~~6~~)) 7 The Director, in consultation with the Director of Transportation, may require more bicycle parking spaces based on the following factors: area topography; pattern and volume of expected bicycle users; nearby residential and employment density; proximity to the Urban Trails system and other existing and planned bicycle facilities; projected transit ridership and expected access to transit by bicycle; and other relevant transportation and land use information.

Section 58. Section 23.54.016 of the Seattle Municipal Code, last amended by Ordinance 125558, is amended as follows:

23.54.016 Major Institutions—((~~parking~~)) Parking and transportation

Except in the MPC-YT zone, Major Institution uses are subject to the following transportation and parking requirements:

* * *

B. Parking ((~~Quantity Required.~~)) quantity required

1. In urban centers and the Station Area Overlay District, no parking is required for Major Institution uses, except for hospitals.

2. For all other Major Institutions the minimum number of parking spaces required is as follows:

a. Long-term ((~~Parking.~~)) parking

1) Medical ((~~Institutions~~)) institutions. A number of spaces equal to 80 percent of hospital-based doctors; plus 25 percent of staff doctors; plus 30 percent of all other employees present at peak hour;

2) Educational ((~~Institutions~~)) institutions. A number of spaces equal to 15 percent of the maximum students present at peak hour, excluding resident students; plus 30 percent of employees present at peak hour; plus 25 percent of the resident unmarried students; plus one space for each married student apartment unit.

b. Short-term ((~~Parking.~~)) parking

1) Medical ((~~Institutions~~)) institutions. A number of spaces equal to one space per six beds; plus one space per five average daily outpatients;

2) Educational ((~~Institutions~~)) institutions. A number of spaces equal to five percent of the maximum students present at peak hour excluding resident students.

c. Additional ((~~Short-term Parking Requirements~~)) short-term parking requirements. When one of the following uses is a Major Institution use, the following additional

short-term parking requirements shall be met. Such requirements may be met by joint use of parking areas and facilities if the Director determines that the uses have different hours of operation according to subsection 23.54.020.G:

1) Museum. One space for each 250 square feet of public floor area;

2) Theater, ((~~Auditorium~~)) auditorium, or ((~~Assembly Hall~~)) assembly hall. One space for each 200 square feet of audience assembly area not containing fixed seats, and one space for every ((~~10~~)) ten seats for floor area containing fixed seats;

3) Spectator ((~~Sports Facility Containing Fewer~~)) sports facility containing fewer than 20,000 ((~~Seats~~)) seats. One space for each ((~~10~~)) ten permanent seats and one space for each 100 square feet of spectator assembly area not containing fixed seats;

4) Spectator ((~~Sports Facility Containing~~)) sports facility containing 20,000 or ((~~More Seats~~)) more seats. One space for each ((~~10~~)) ten permanent seats and one bus space for each 300 permanent seats.

d. Bicycle ((~~Parking~~)) parking. Bicycle parking meeting the development standards of subsections ((~~23.54.015.K.2~~)) 23.54.037.B through ((~~23.54.015.K.6~~)) 23.54.037.G and subsection 23.54.016.D.2 shall be provided in the following quantities:

1) Medical ((~~Institutions~~)) institutions. A number of spaces equal to two percent of employees, including doctors, present at peak hour;

2) Educational ((~~Institutions~~)) institutions. A number of spaces equal to ((~~10~~)) ten percent of the maximum students present at peak hour plus five percent of employees.

If at the time of application for a master use permit, the applicant can demonstrate that the bicycle parking requirement is inappropriate for a particular institution because of topography, location, nature of the users of the institution or other reasons, the Director may modify the bicycle parking requirement.

3. Parking ((~~Deficits~~)) deficits. In addition to providing the minimum required parking for a new structure, five percent of any vehicular or bicycle parking deficit as determined by the minimum requirements of this subsection 23.54.016.B, existing on ((~~the effective date of the ordinance codified in this section~~)) May 2, 1990, shall be supplied before issuance of a certificate of occupancy.

* * *

Section 59. Section 23.54.020 of the Seattle Municipal Code, last amended by Ordinance 126509, is amended as follows:

23.54.020 Parking quantity exceptions

The motor vehicle parking quantity exceptions set forth in this Section 23.54.020 apply in all zones except downtown zones, which are regulated by Section 23.49.019, and Major Institution zones, which are regulated by Section 23.54.016.

A. Adding ((~~Units~~)) units to ((~~Existing Structures~~)) existing structures in Multifamily and Commercial ((~~Zones.~~)) zones

1. For the purposes of this Section 23.54.020, "existing structures" means those structures that were established under permit, or for which a permit has been granted and has not expired as of the applicable date, as follows:

a. In multifamily zones, August 10, 1982;

b. In commercial zones, June 9, 1986.

2. In locations in a multifamily or commercial zone where there is a minimum parking requirement, one dwelling unit may either be added to an existing structure or may be built on a lot that contains an existing structure without additional parking if both of the following requirements are met:

a. Either the existing parking provided on the lot meets development standards, or the lot area is not increased and existing parking is screened and landscaped to the greatest extent practical; and

b. Any additional parking shall meet all development standards for the zone.

3. In locations in a multifamily or commercial zone where there is a minimum parking requirement, the Director may authorize a reduction or waiver of the parking requirement as a Type I decision when dwelling units are proposed to be added either to an existing structure or on a lot that contains an existing structure, in addition to the exception permitted in subsection 23.54.020.A.2, if the ((~~conditions in subsections 23.54.020.A.3.a and b below are met, and either of the conditions in subsections 23.54.020.A.3.c or d below are met:~~

~~a. The~~)) only use of the structure will be residential((~~;~~)) and <u>one of the following conditions is met:</u>

((~~b. The lot is not located in either the University District Parking Overlay Area (Map A for 23.54.015) or the Alki Area Parking Overlay (Map B for 23.54.015); and~~

~~c.~~)) <u>a.</u> The topography of the lot or location of existing structures makes provision of an off-street parking space physically infeasible in a conforming location; or

((~~d.~~)) b. The lot is located in a residential parking zone (RPZ) and a current parking study is submitted showing a utilization rate of less than 75 percent for on-street parking within 400 feet of all lot lines.

B. Tandem ((~~Parking~~)) parking in ((~~Multifamily Structures~~)) multifamily structures. ((~~1.~~)) Off-street parking required for multifamily structures may be provided as tandem parking, as defined in Section 23.54.030. ((~~A tandem parking space counts as one and one-half parking spaces, except as provided in subsection 23.54.020.B.2 below, and must meet the minimum size requirements of subsection 23.54.030.A.~~

~~2. When a minimum of at least one parking space per dwelling unit in a multifamily structure is required, the total number of parking spaces provided, counting each tandem parking space as one space, may not be less than the total number of dwelling units.~~)) A tandem parking space counts at a rate of one space for every 20 linear feet of depth excluding required access aisles.

* * *

Section 60. Section 23.54.030 of the Seattle Municipal Code, last amended by Ordinance 127099, is amended as follows:

23.54.030 Parking space and access standards

All parking spaces provided, whether required by Section 23.54.015 or not, and required barrier-free parking, shall meet the standards of this Section 23.54.030.

A. Parking space dimensions

1. "Large vehicle" means the minimum size of a large vehicle parking space shall be ((~~8.5~~)) 8 feet in width and 19 feet in length.

2. "Medium vehicle" means the minimum size of a medium vehicle parking space shall be 8 feet in width and 16 feet in length.

3. "Small vehicle" means the minimum size of a small vehicle parking space shall be 7.5 feet in width and 15 feet in length.

4. "Barrier-free parking" means a parking space meeting the following standards:

a. Parking spaces shall not be less than 8 feet in width and shall have an adjacent access aisle not less than 5 feet in width. Van-accessible parking spaces shall have an adjacent access aisle not less than 8 feet in width. Where two adjacent spaces are provided, the access aisle may be shared between the two spaces. Boundaries of access aisles shall be marked so that aisles will not be used as parking space.

b. A minimum length of 19 feet or when more than one barrier-free parking space is provided, at least one shall have a minimum length of 19 feet, and other spaces may be the lengths of small, medium, or large spaces in approximate proportion to the number of each size space provided on the lot.

5. "Tandem parking" means a parking space equal to the width and two times the length of the vehicle size standards in subsections 23.54.030.A.1, 23.54.030.A.2, and 23.54.030.A.3 for the size of the vehicle to be accommodated.

6. No wall, post, guardrail, or other obstruction, or lot line, is permitted within the area for car door opening. Columns or other structural elements may encroach into the parking space a maximum of 6 inches on a side, except in the area for car door opening 5 feet from the longitudinal centerline, or 4 feet from the transverse centerline of a parking space (see Exhibit A for 23.54.030).

7. If the parking space is next to a lot line and the parking space is parallel to the lot line, the minimum width of the space is 9 feet.

Exhibit A for 23.54.030

Encroachments ((~~Into Required Parking Space~~)) <u>into required parking</u>

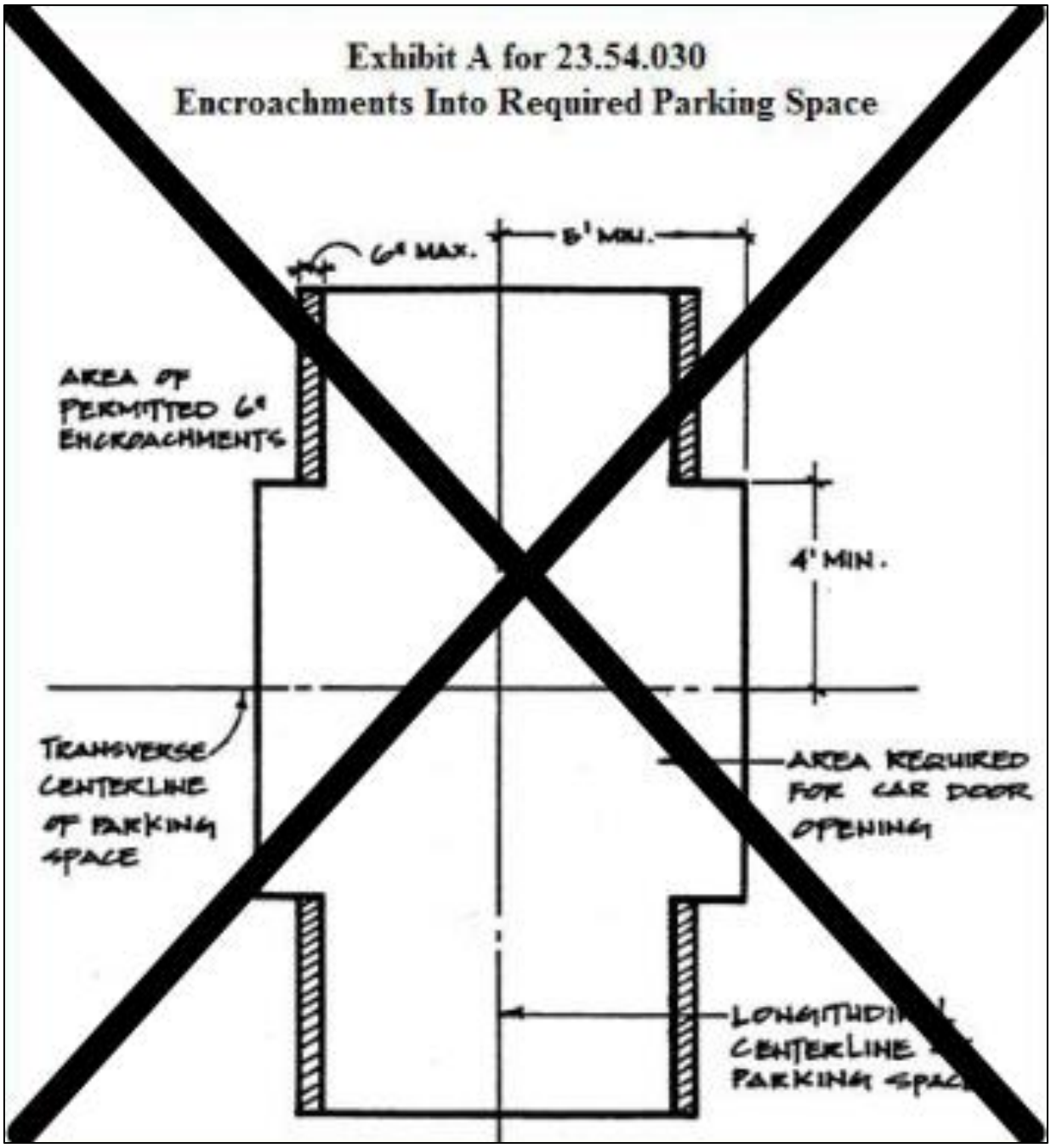
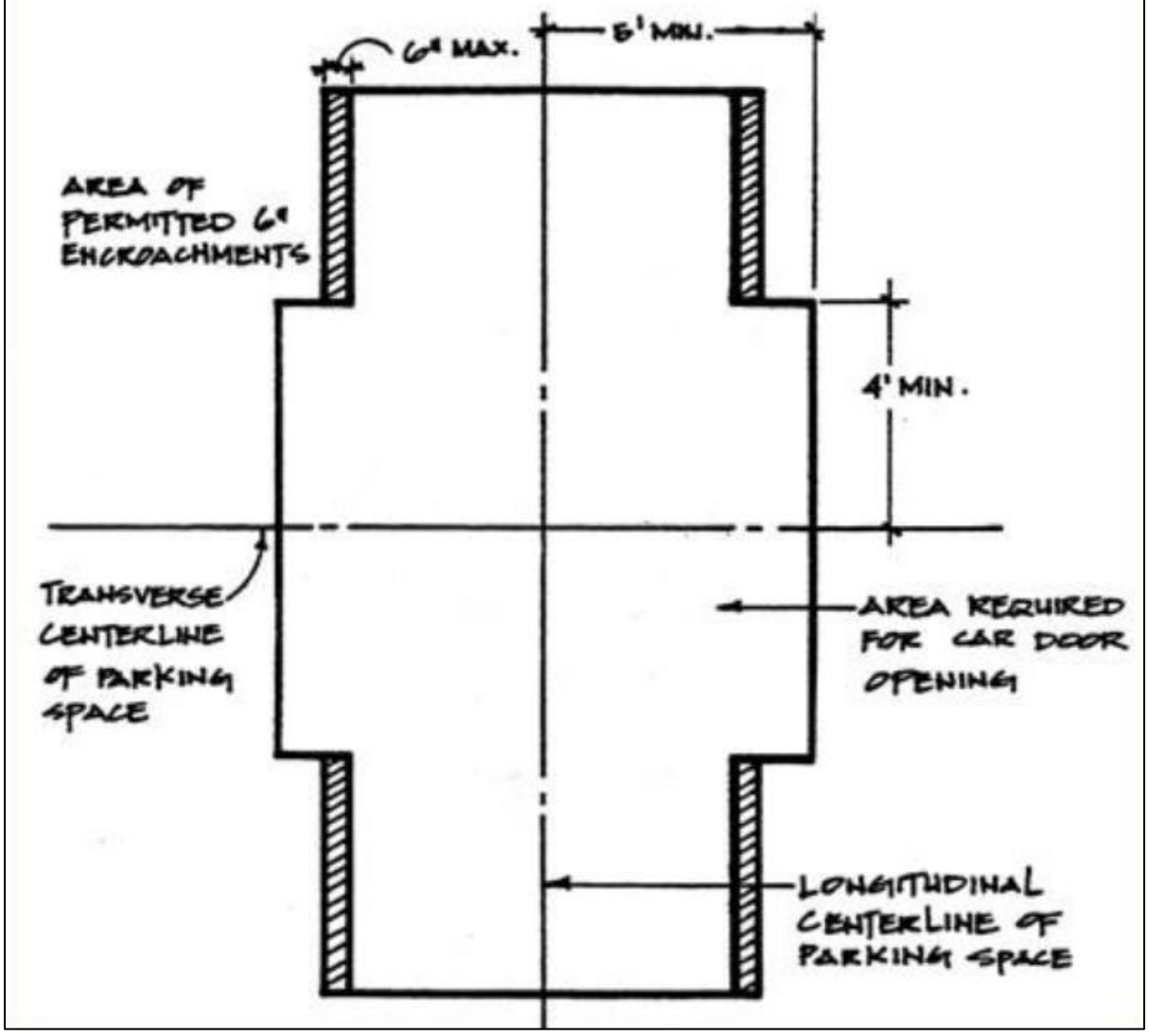


Exhibit A for 23.54.030
Encroachments into required parking



B. Parking space requirements. The required size of parking spaces shall be determined by whether the parking is for a residential, live-work, or ((~~non-residential~~)) nonresidential use. In structures containing residential uses and also containing either ((~~non-residential~~)) nonresidential uses or live-work units, parking that is clearly set aside and reserved for residential or live-work use shall meet the standards of subsection 23.54.030.B.1. Parking for

all other uses within the structure shall meet the standards of subsection 23.54.030.B.2. All uses shall provide barrier-free accessible parking if required by the Seattle Building Code or the Seattle Residential Code.

1. Residential uses

a. When five or fewer parking spaces are provided, the minimum required size of a parking space shall be for a medium vehicle, as described in subsection 23.54.030.A.2, except as provided in subsection 23.54.030.B.1.d.

b. When more than five parking spaces are provided, a minimum of 60 percent of the parking spaces shall be striped for medium vehicles. The minimum size for a medium parking space shall also be the maximum size. Forty percent of the parking spaces may be striped for any size category in subsection 23.54.030.A, provided that when parking spaces are striped for large vehicles, the minimum required aisle width shall be as shown for medium vehicles.

c. Assisted living facilities. Parking spaces shall be provided as in subsections 23.54.030.B.1.a and 23.54.030.B.1.b, except that a minimum of two spaces shall be striped for a large vehicle.

d. ((~~Townhouse units.~~)) For an individual garage serving ((~~a townhouse~~)) an individual dwelling unit, the minimum required size of a parking space shall be for a medium vehicle, as described in subsection 23.54.030.A.

2. ((~~Non-residential~~)) Nonresidential uses

a. When ten or fewer parking spaces are provided, a maximum of 25 percent of the parking spaces may be striped for small vehicles. A minimum of 75 percent of the spaces shall be striped for large vehicles.

b. When between 11 and 19 parking spaces are provided, a minimum of 25 percent of the parking spaces shall be striped for small vehicles. The minimum required size for these small parking spaces shall also be the maximum size. A maximum of 65 percent of the parking spaces may be striped for small vehicles. A minimum of 35 percent of the spaces shall be striped for large vehicles.

c. When 20 or more parking spaces are provided, a minimum of 35 percent of the parking spaces shall be striped for small vehicles. The minimum required size for small parking spaces shall also be the maximum size. A maximum of 65 percent of the parking spaces may be striped for small vehicles. A minimum of 35 percent of the spaces shall be striped for large vehicles.

d. The minimum vehicle clearance shall be at least 6 feet 9 inches on at least one floor, and there shall be at least one direct entrance that is at least 6 feet 9 inches in height for all parking garages accessory to ((~~non-residential~~)) nonresidential uses and live-work units and for all flexible-use parking garages.

3. Live-work uses. The first required parking space shall meet the parking standards for residential use. Additional required parking for a live-work use shall meet the parking standards for ((~~non-residential~~)) nonresidential use.

C. Backing ((~~Distances~~)) distances and ((~~Moving Other Vehicles.~~)) moving other vehicles

1. Adequate ingress to and egress from all parking spaces shall be provided without having to move another vehicle, except in the case of multiple spaces provided for a ((~~single-family~~)) dwelling unit ((~~or an accessory dwelling unit associated with a single-family~~

~~dwelling,~~)) or in the case of tandem parking authorized under ((~~Section~~)) subsection 23.54.020.B.

2. Except for lots with fewer than three parking spaces, ingress to and egress from all parking spaces shall be provided without requiring backing more than 50 feet.

D. Driveways. Driveway requirements for residential and nonresidential uses are described below. When a driveway is used for both residential and nonresidential parking, it shall meet the standards for nonresidential uses described in subsection 23.54.030.D.2.

1. Residential uses((~~.~~))

a. Driveway width. Driveways less than 100 feet in length that serve 30 or fewer parking spaces shall be a minimum of 10 feet in width for one-way or two-way traffic.

b. Except for driveways serving one ((~~single-family~~)) dwelling unit, driveways more than 100 feet in length that serve 30 or fewer parking spaces shall either:

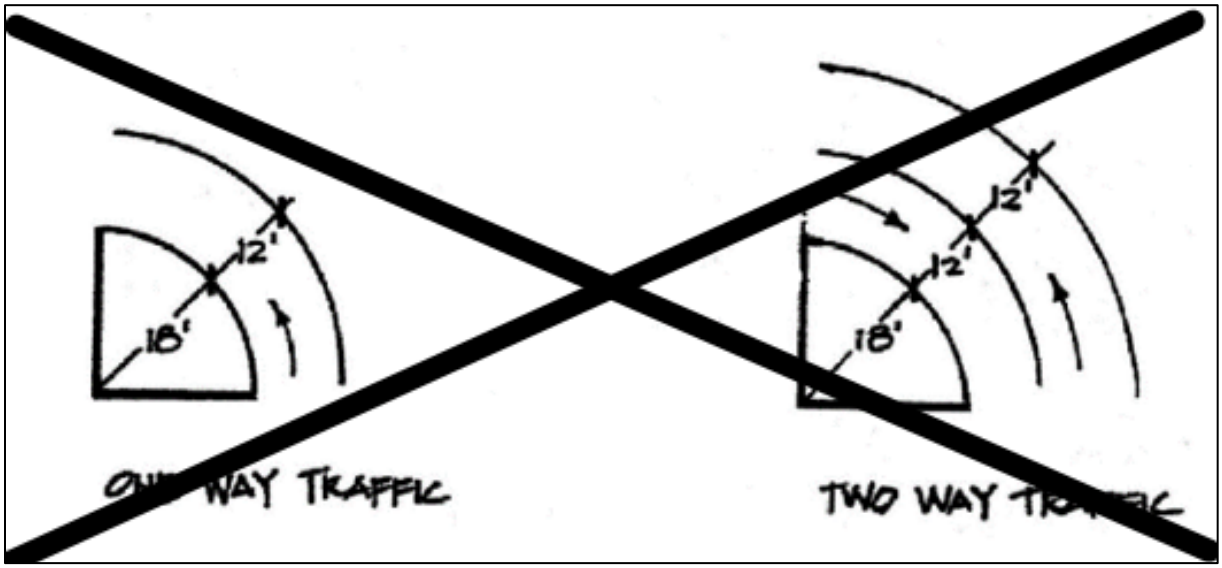
1) ((~~be~~)) Be a minimum of 16 feet wide, tapered over a 20 foot distance to a 10 foot opening at the lot line; or

2) ((~~be~~)) Be a minimum of 10 feet wide and provide a passing area at least 20 feet wide and 20 feet long. The passing area shall begin 20 feet from the lot line, with an appropriate taper to meet the 10-foot opening at the lot line. If a taper is provided at the other end of the passing area, it shall have a minimum length of 20 feet.

c. Driveways of any length that serve more than 30 parking spaces shall be at least 10 feet wide for one-way traffic and at least 20 feet wide for two-way traffic.

d. Driveways for two attached ((~~rowhouse or townhouse~~)) dwelling units may be paired so that there is a single curb cut providing access. The maximum width of the paired driveway is 18 feet.

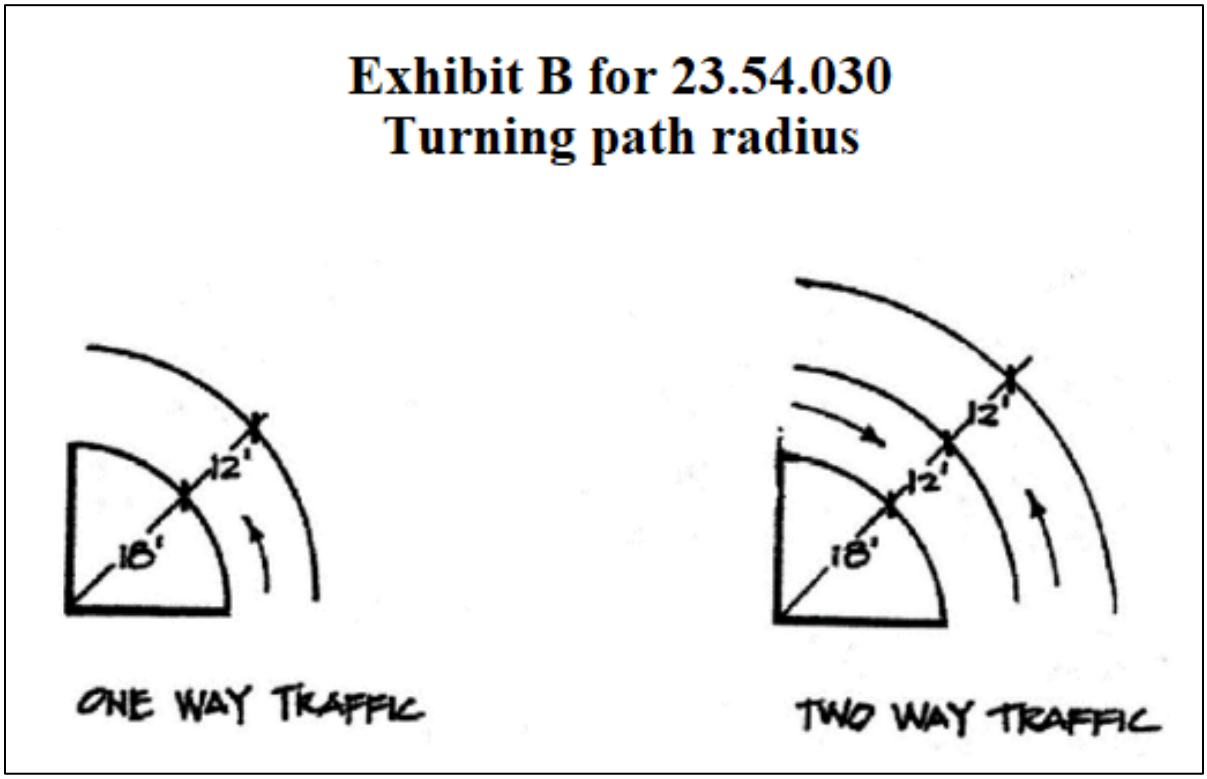
e. Driveways with a turning radius of more than 35 degrees shall conform to the minimum turning path radius shown in Exhibit B for 23.54.030.



((~~Exhibit B for 23.54.030: Turning Path Radius~~))

Exhibit B for 23.54.030

Turning path radius



f. Vehicles may back onto a street from a parking area serving five or fewer vehicles, provided that either:

1) The street is not an arterial as defined in Section 11.18.010; or

2) For a lot with one ((~~single-family~~)) dwelling unit or one parking space, the Director may permit backing onto an arterial based on a safety analysis that addresses visibility, traffic volume, and other relevant issues.

g. Nonconforming driveways. The number of parking spaces served by an existing driveway that does not meet the standards of this subsection 23.54.030.D.1 shall not be increased. This prohibition may be waived by the Director after consulting with the Director of the Seattle Department of Transportation, based on a safety analysis.

2. Nonresidential ((~~Uses.~~)) uses

a. Driveway ((~~Widths.~~)) widths

1) The minimum width of driveways for ((~~one way~~)) one-way traffic shall be 12 feet and the maximum width shall be 15 feet.

2) The minimum width of driveways for ((~~two way~~)) two-way traffic shall be 22 feet and the maximum width shall be 25 feet.

b. Driveways shall conform to the minimum turning path radius shown in Exhibit B for 23.54.030.

c. For driveways that provide access to a solid waste management use the Director may allow both a maximum driveway width greater than the limits set in subsection 23.54.030.D.2.a and appropriate turning path radii, as determined necessary for truck maneuvering.

3. Driveway slope for all uses. No portion of a driveway, whether located on a lot or on a right-of-way, shall exceed a slope of 15 percent, except as provided in this subsection 23.54.030.D.3. The maximum 15 percent slope shall apply in relation to both the current grade of the right-of-way to which the driveway connects, and to the proposed finished grade of the right-of-way if it is different from the current grade. The ends of a driveway shall be adjusted to accommodate an appropriate crest and sag. The Director may permit a driveway slope of more than 15 percent if it is found that:

a. The topography or other special characteristic of the lot makes a 15 percent maximum driveway slope infeasible;

b. The additional amount of slope permitted is the least amount necessary to accommodate the conditions of the lot; and

c. The driveway is still useable as access to the lot.

E. Parking aisles

1. Parking aisles shall be provided according to the requirements of Table A for 23.54.030 and Exhibit C for 23.54.030.

Table A for 23.54.030
Parking aisle dimensions

Parking angle	Stall width	Stall length (in feet)	Aisle width (in feet)[1]	Curb depth per car (in feet)	Unit width (in feet)[2]	Curb length per car (in feet)
0°	Small	18	10	7.5	25	18
	Medium	20	10	8	26	20
	Large	24	12	8	28	24
45°	Small	15	11	15.91	42.82	10.61
	Medium	16	13	16.97	46.94	11.3
	Large	19	13	19.09	51.18	11.3
60°	Small	15	13	16.74	46.48	8.66
	Medium	16	15	17.86	50.72	9.24
	Large	19	17.5	20.45	58.41	9.24
75°	Small	15	16.5	16.43	49.36	7.76
	Medium	16	18.5	17.52	53.55	8.25
	Large	19	20	20.42	60.84[2]	8.25
90°	Small	15	20	15	50	7.5
	Medium	16	22	16	54	8
	Large	19	24[3]	19	62[2]	8

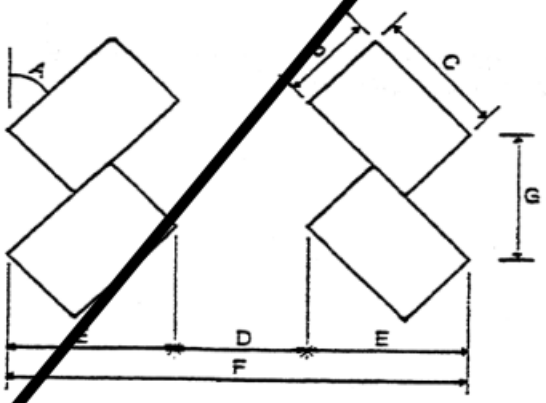
Footnotes for Table A for 23.54.030
[1] Required aisle width is for one-way traffic only. If two-way traffic is proposed, then the minimum aisle width shall be 20 feet or greater.
[2] 60 feet may be substituted for required unit width on lots where the available width is in 60-foot whole multiples, provided that the minimum width of the parking stalls shall be 9 feet.
[3] For lots 44 feet in width or less, the Director may reduce the aisle width to as low as 20 feet if large parking spaces are provided at 90 degrees as long as the spaces are 9 feet wide.

A Parking Angle	B Stall Width	C Stall Length	D Aisle Width [1]	E Curb Depth Per Car	F Unit Width [3]	G Curb Length Per Car
0°	7.5	18.0	10.0	7.5	25.0	18.0
	8.0	20.0	10.0	8.0	26.0	20.0
	8.5	24.0	12.0	8.5	29.0	24.0
45°	7.5	15.0	11.0	15.91	42.82	10.61
	8.0	16.0	13.0	16.97	46.90	11.3
	8.5	19.0	13.0	19.44	51.88	12.02
60°	7.5	15.0	13.0	16.74	46.48	8.66
	8.0	16.0	15.0	17.86	50.72	9.24
	8.5	19.0	17.5	20.70	59.90	9.82
75°	7.5	15.0	16.5	16.43	49.36	7.76
	8.0	16.0	18.5	17.52	53.54	8.25
	8.5	19.0	20.0	20.55	61.10 [3]	8.80
90°	7.5	15.0	20.0	15.0	50.0	7.5
	8.0	16.0	22.0	16.0	54.0	8.0
	8.5	19.0 [2]	24.0 [2]	19.0	62.0 [3]	8.5

[1] Required aisle width is for one-way traffic only. If two-way traffic is proposed, then the minimum aisle width shall be 20 feet or greater.

[2] When lot width is less than 43 feet, 40 feet may be substituted for a two-way aisle and a single row of cars at 90° to the aisle, provided that the minimum width of the parking stalls shall be 9½ feet.

[3] 60 feet may be substituted for required unit width on lots where the available width is in 60-foot whole multiples, provided that the minimum width of the parking stalls shall be 9½ feet.



The following equations may be used to compute dimensions for parking angles other than those provided in the chart above:

$E = C \sin A + B \cos A$

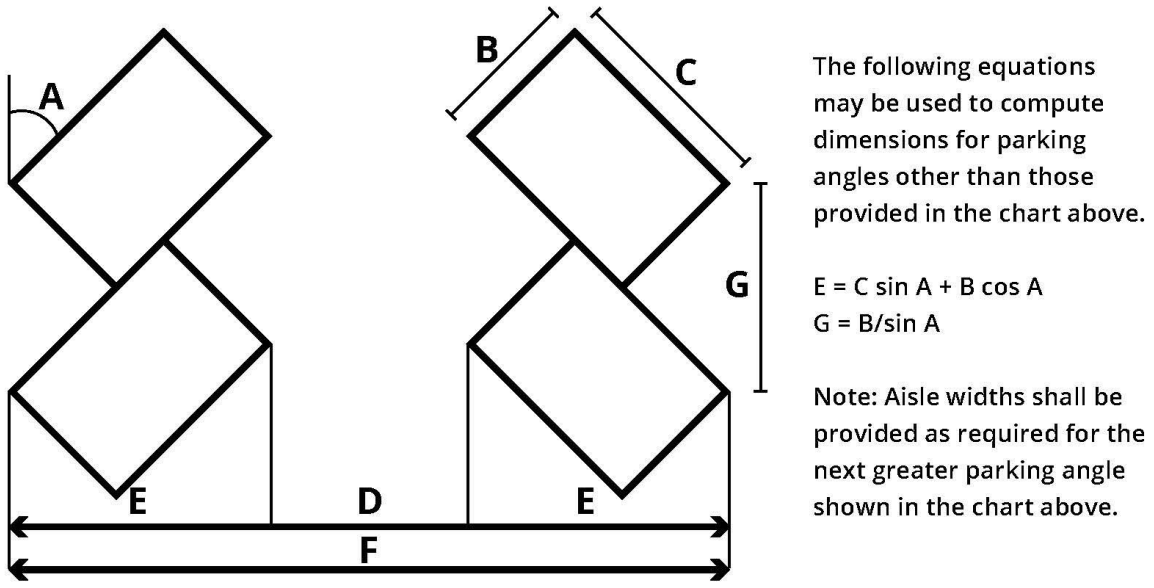
$G = B / \sin A$

NOTE: Aisle widths shall be provided as required for the next greater parking angle shown in the chart above.

((~~Exhibit C for 23.54.030: Parking Aisle Dimensions~~))

Exhibit C for 23.54.030

Parking aisle dimension measurement



2. Minimum aisle widths shall be provided for the largest vehicles served by the aisle.

3. Turning and maneuvering areas shall be located on private property, except that alleys may be credited as aisle space.

4. Aisle slope shall not exceed 17 percent provided that the Director may permit a greater slope if the criteria in subsections 23.54.030.D.3.a, 23.54.030.D.3.b, and 23.54.030.D.3.c are met.

* * *

((~~H~~)) F. Attendant ((~~Parking~~)) parking. In downtown zones, any off-street parking area or structure providing more than ((~~5~~)) five parking spaces where automobiles are parked solely by attendants employed for that purpose shall have parking spaces at least 8 feet in width, and 15 feet in length. Subsections ((~~A, B, C, D and E of this Section 23.54.030~~)) 23.54.030.A, 23.54.030.B, 23.54.030.C, 23.54.030.D, and 23.54.030.E shall not apply, except that the grade curvature of any area used for automobile travel or storage shall not exceed that specified in subsection 23.54.030.D.3. Should attendant operation be discontinued, the provisions of subsections ((~~23.54.030 A, B, C, D and E~~)) 23.54.030.A, 23.54.030.B, 2054.030.C, 23.54.030.D, and 23.54.030.E shall apply to the parking.

((~~I~~)) G. Off-street ((~~Bus Parking~~)) bus parking. Bus parking spaces, when required, shall be 13 feet in width and 40 feet in length. Buses parked ((~~en masse~~)) together shall not be required to have adequate ingress and egress from each parking space.

((~~J~~)) H. The Director may, as a Type I decision, modify any required dimension or distribution percentage of parking spaces identified in subsections 23.54.030.A or 23.54.030.B to allow more efficient use of a surface parking area or parking garage, when the parking area or parking garage provides adequate and safe circulation.

* * *

Section 61. Subsections 23.54.030.F and 23.54.030.G of the Seattle Municipal Code, which section was last amended by Ordinance 127099, are amended as follows:

* * *

23.54.031 Curb cuts

((~~F. Curb cuts.~~)) The number of permitted curb cuts is determined by whether the parking served by the curb cut is for residential or nonresidential use, and by the zone in which the use

is located. If a curb cut is used for more than one use or for one or more live-work units, the requirements for the use with the largest curb cut requirements shall apply.

((~~1.~~)) A. Residential uses

((~~a.~~)) 1. Number of curb cuts

((~~1~~)) a. For lots not located on a principal arterial as designated by the Seattle Department of Transportation, curb cuts are permitted according to Table A for ((~~23.54.030~~)) 23.54.031:

Table A for ((~~23.54.030~~)) 23.54.031
Curb cuts for lots not located on a principal arterial or easement frontage

Street or easement frontage of the lot	**Number of curb cuts permitted**
80 feet or less	1
Greater than 80 feet up to 160 feet	2
Greater than 160 feet up to 240 feet	3
Greater than 240 feet up to 320 feet	4
For lots with frontage in excess of 320 feet, the pattern established above continues.	

((~~2~~)) b. For lots on principal arterials as designated by the Seattle Department of Transportation, curb cuts are permitted according to Table B for ((~~23.54.030~~)) 23.54.031:

Table B for ((~~23.54.030~~)) 23.54.031
Curb cuts for principal arterial street frontage

Street or easement frontage of the lot	**Number of curb cuts permitted**
160 feet or less	1

Table B for ((~~23.54.030~~)) 23.54.031 Curb cuts for principal arterial street frontage	
Street or easement frontage of the lot	**Number of curb cuts permitted**
Greater than 160 feet up to 320 feet	2
Greater than 320 feet up to 480 feet	3
For lots with street frontage in excess of 480 feet, the pattern established above continues.	

((~~3~~)) c. On a lot that has both principal arterial and non-principal arterial street frontage, the total number of curb cuts on the principal arterial is calculated using only the length of the street lot line on the principal arterial.

((~~4~~)) d. If two adjoining lots share a common driveway, the combined frontage of the two lots will be considered as one in determining the maximum number of permitted curb cuts.

((~~b.~~)) 2. Curb cut width. Curb cuts shall not exceed a maximum width of 10 feet except that:

((~~1~~)) a. For lots on principal arterials as designated by the Seattle Department of Transportation, the maximum curb cut width is 23 feet;

((~~2~~)) b. One curb cut greater than 10 feet but in no case greater than 20 feet in width may be substituted for each two curb cuts permitted by subsection ((~~23.54.030.F.1.a~~)) 23.54.031.A.1;

((~~3~~)) c. A greater width may be specifically permitted by the development standards in a zone;

((~~4~~)) d. If subsection 23.54.030.D requires a driveway greater than 10 feet in width, the curb cut may be as wide as the required width of the driveway; and

((~~5~~)) e. A curb cut may be less than the maximum width permitted but shall be at least as wide as the minimum required width of the driveway it serves.

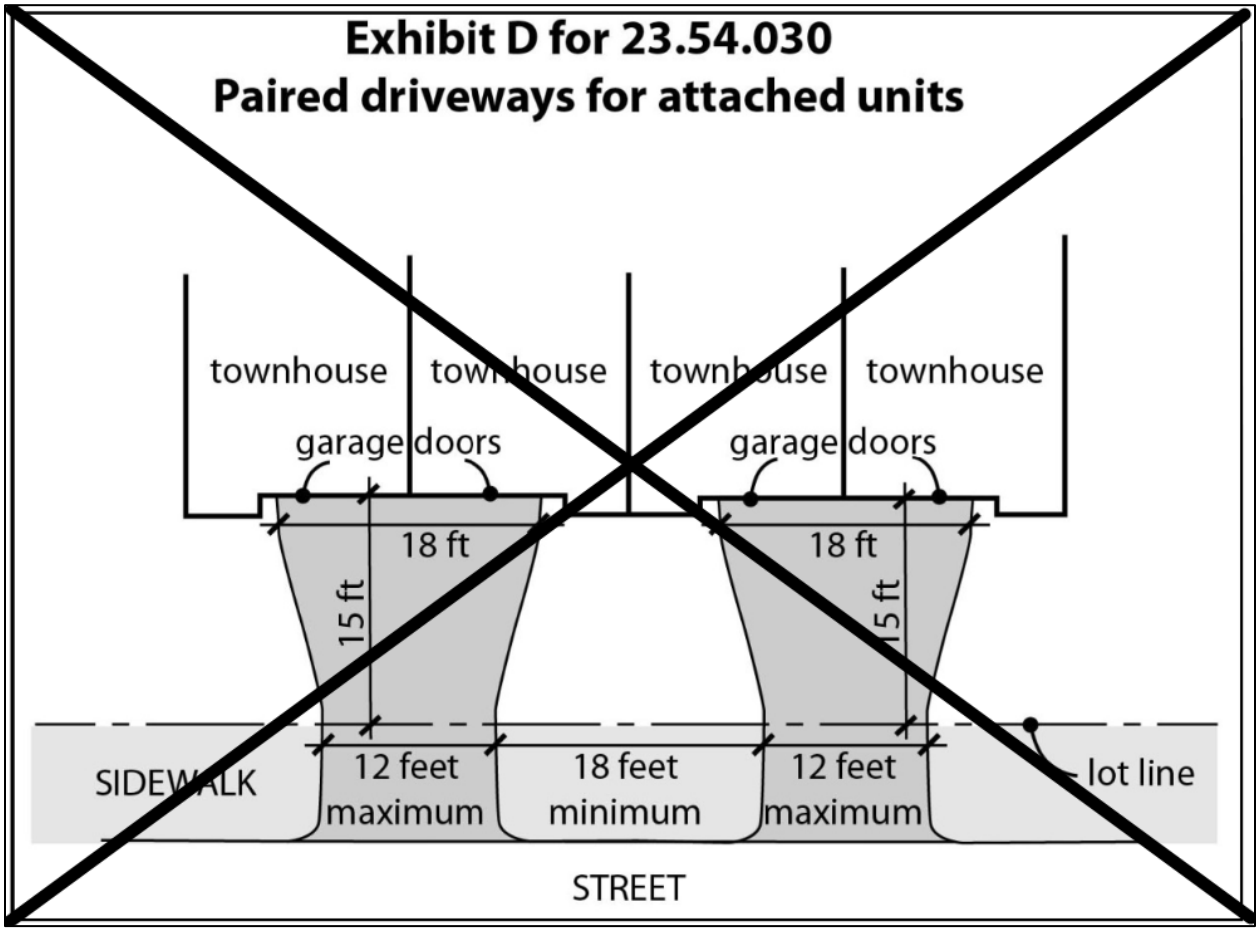
((~~c.~~)) 3. Distance between curb cuts

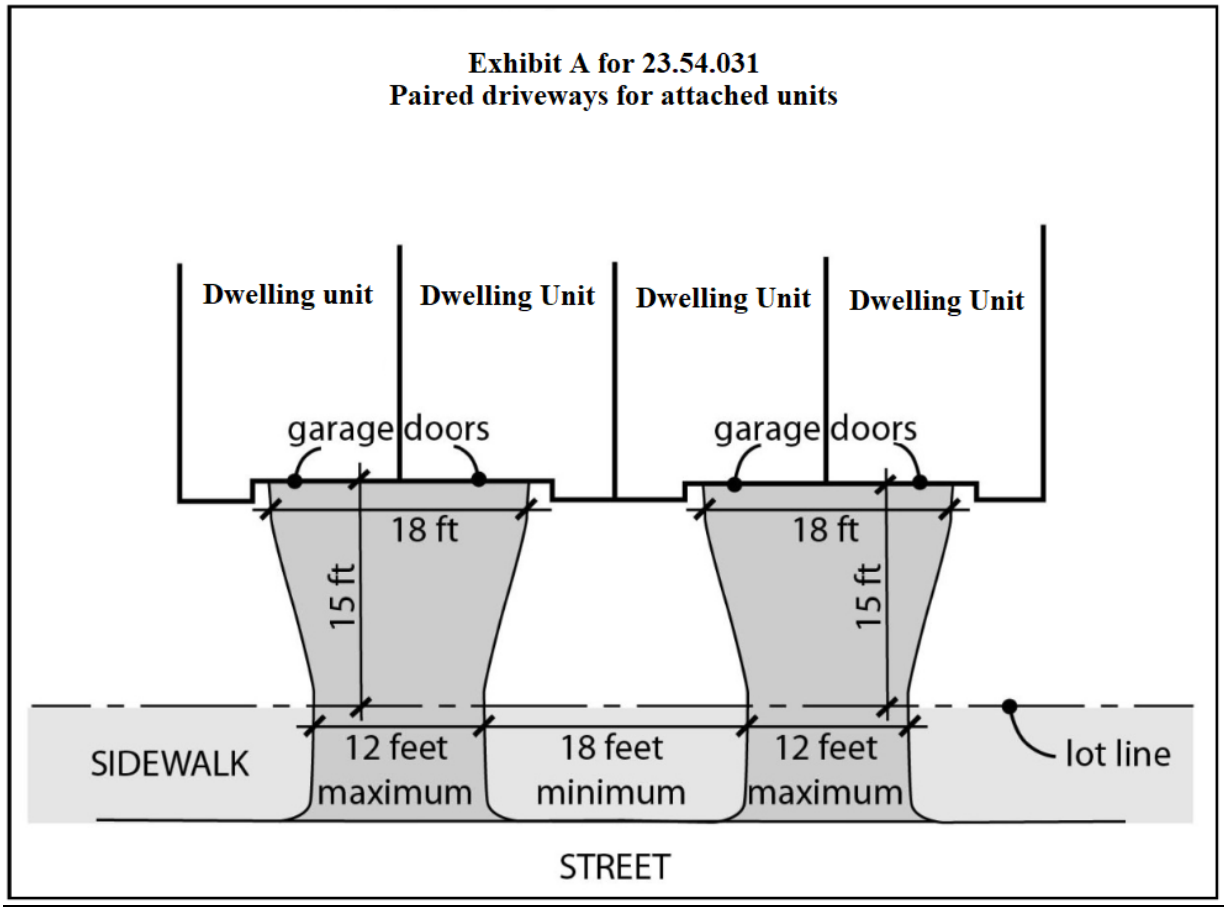
((~~1~~)) a. The minimum distance between any two curb cuts located on a lot is 30 feet, except as provided in subsection ((~~23.54.030.F.1.c.2~~)) 23.54.031.A.3.b.

((~~2~~)) b. For ((~~rowhouse and townhouse developments~~)) attached dwelling units, the minimum distance between curb cuts is 18 feet (See Exhibit ((~~D for 23.54.030~~)) A for 23.54.031). For ((~~rowhouse and townhouse developments~~)) attached dwelling units located on abutting lots, the minimum distance between curb cuts is 18 feet.

Exhibit ((~~D for 23.54.030~~)) A for 23.54.031

Paired driveways for attached units





((~~2.~~)) B. Nonresidential uses in all zones except industrial zones

((~~a.~~)) 1. Number of curb cuts

((~~1~~)) a. In all residential zones, RC zones, and within the Major Institution Overlay District, two-way curb cuts are permitted according to Table C for ((~~23.54.030~~)) 23.54.031:

Table C for ((~~23.54.030~~)) 23.54.031
Number of curb cuts in residential zones, RC zones, and the Major Institution Overlay District

Street frontage of the lot	Number of curb cuts permitted
80 feet or less	1

Table C for ((~~23.54.030~~)) 23.54.031
Number of curb cuts in residential zones, RC zones, and the Major Institution Overlay District

Street frontage of the lot	Number of curb cuts permitted
Greater than 80 feet up to 240 feet	2
Greater than 240 feet up to 360 feet	3
Greater than 360 feet up to 480 feet	4
For lots with frontage in excess of 480 feet, one curb cut is permitted for every 120 feet of street frontage.	

((~~2~~)) b. The Director may allow two one-way curb cuts to be substituted for one two-way curb cut, after determining, as a Type I decision, that there would not be a significant conflict with pedestrian traffic.

((~~3~~)) c. The Director shall, as a Type I decision, determine the number and location of curb cuts in C1 and C2 zones and the location of curb cuts in SM zones.

((~~4~~)) d. In downtown zones, a maximum of two curb cuts for one-way traffic at least 40 feet apart, or one curb cut for two-way traffic, are permitted on each street front where access is permitted by subsection 23.49.019.H. No curb cut shall be located within 40 feet of an intersection. These standards may be modified by the Director as a Type I decision on lots with steep slopes or other special conditions, to the minimum extent necessary to provide vehicular and pedestrian safety and facilitate a smooth flow of traffic.

((~~5~~)) e. For public schools, the Director shall permit, as a Type I decision, the minimum number of curb cuts that the Director determines is necessary.

((~~6~~)) f. In NC zones, curb cuts shall be provided according to subsection 23.47A.032.A, or, when subsection 23.47A.032.A does not specify the maximum number of curb cuts, according to subsection ((~~23.54.030.F.2.a.1~~)) 23.54.031.B.1.a.

((~~7~~)) g. For police and fire stations the Director shall permit the minimum number of curb cuts that the Director determines is necessary to provide adequate maneuverability for emergency vehicles and access to the lot for passenger vehicles.

((~~b.~~)) 2. Curb cut widths

((~~1~~)) a. For one-way traffic, the minimum width of curb cuts is 12 feet, and the maximum width is 15 feet.

((~~2~~)) b. For two-way traffic, the minimum width of curb cuts is 22 feet, and the maximum width is 25 feet, except that the maximum width may be increased to 30 feet if truck and auto access are combined.

((~~3~~)) c. For public schools, the maximum width of a curb cut is 25 feet. Development standard departures may be granted or required pursuant to the procedures and criteria set forth in Chapter 23.79.

((~~4~~)) d. For fire and police stations, the Director may allow curb cuts up to, and no wider than, the minimum width necessary to provide access for official emergency vehicles that have limited maneuverability and that must rapidly respond to emergencies. Curb cuts for fire and police stations are considered curb cuts for two-way traffic.

((~~5~~)) e. If one of the following conditions applies, the Director may require a curb cut of up to 30 feet in width, if it is found that a wider curb cut is necessary for safe access:

((~~i.~~)) 1) The abutting street has a single lane on the side that abuts the lot; or

((~~ii.~~)) 2) The curb lane abutting the lot is less than 11 feet wide; or

((~~iii.~~)) 3) The proposed development is located on an arterial with an average daily traffic volume of over 7,000 vehicles; or

((~~iv.~~)) 4) Off-street loading berths are required according to Section 23.54.035.

((~~c.~~)) 3. The entrances to all garages accessory to nonresidential uses or live-work units and the entrances to all flexible-use parking garages shall be at least 6 feet 9 inches high.

((~~3.~~)) C. All uses in industrial zones

((~~a.~~)) 1. Number and location of curb cuts. The number and location of curb cuts will be determined by the Director.

((~~b.~~)) 2. Curb cut width. Curb cut width in ((~~Industrial~~)) industrial zones shall be as follows:

((~~1~~)) a. Except as set forth in subsection ((~~23.54.030.F.3.b.4~~)) 23.54.031.C.2.d, if the curb cut provides access to a parking area or structure, it must be a minimum of 15 feet wide and a maximum of 30 feet wide.

((~~2~~)) b. If the curb cut provides access to a loading berth, the maximum width may be increased to 50 feet.

((~~3~~)) c. Within the minimum and maximum widths established by this subsection ((~~23.54.030.F.3~~)) 23.54.031.C, the Director shall determine the size of the curb cuts.

((~~4~~)) d. If the curb cut provides access to a solid waste management use, the Director may determine the maximum width of the curb cut.

((~~4.~~)) D. Curb cuts for access easements

((~~a.~~)) 1. If a lot is crossed by an access easement serving other lots, the curb cut serving the easement may be as wide as the easement roadway.

((~~b.~~)) 2. The curb cut serving an access easement shall not be counted against the number or amount of curb cuts permitted to a lot if the lot is not itself served by the easement.

((~~5.~~)) E. Curb cut flare. A flare with a maximum width of 2.5 feet is permitted on either side of curb cuts in any zone.

((~~6.~~)) F. Replacement of unused curb cuts. When a curb cut is no longer needed to provide access to a lot, the curb and any planting strip must be replaced.

((~~7.~~)) G. Curb cuts are not allowed on streets if alley access to a lot is feasible but has not been provided.

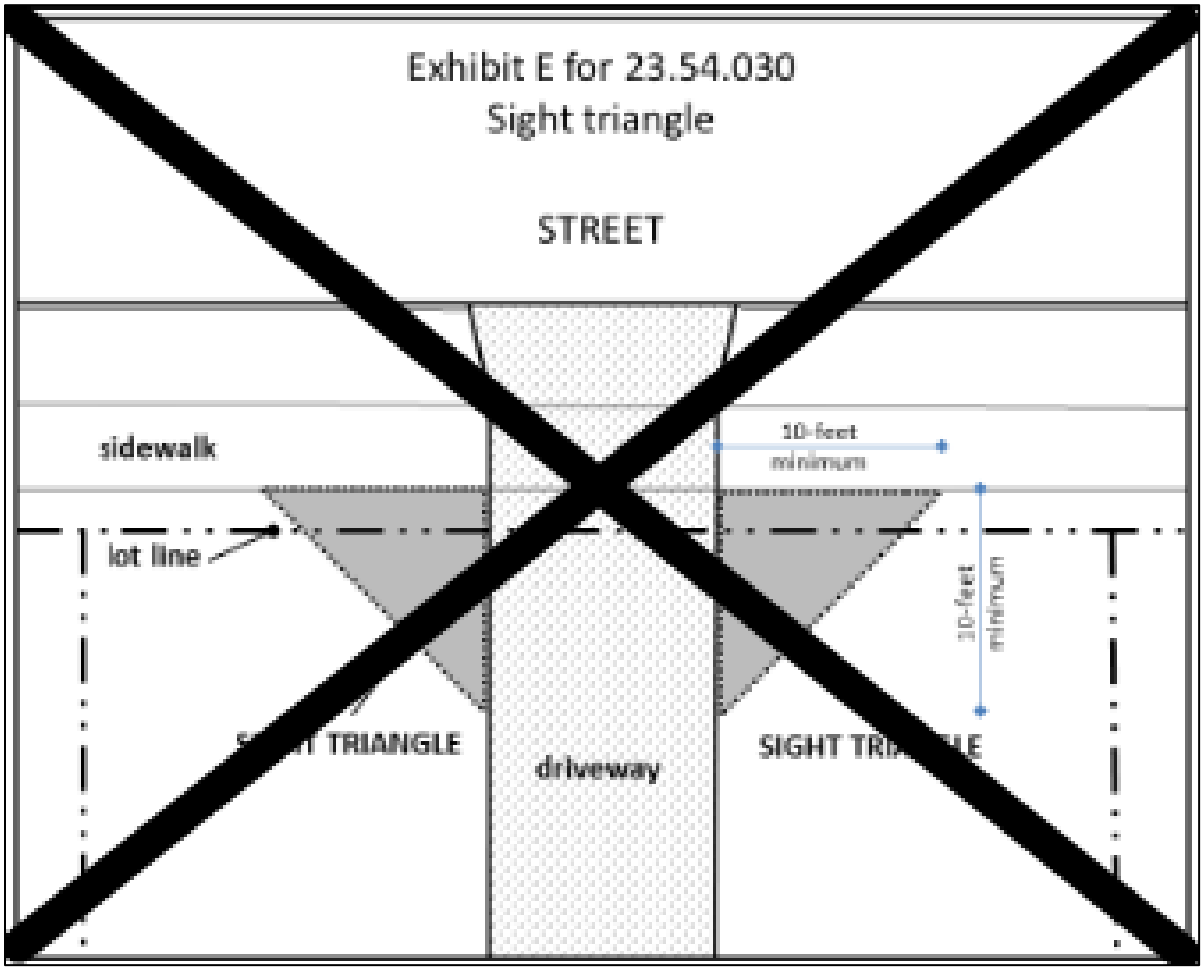
23.54.032 Sight triangles

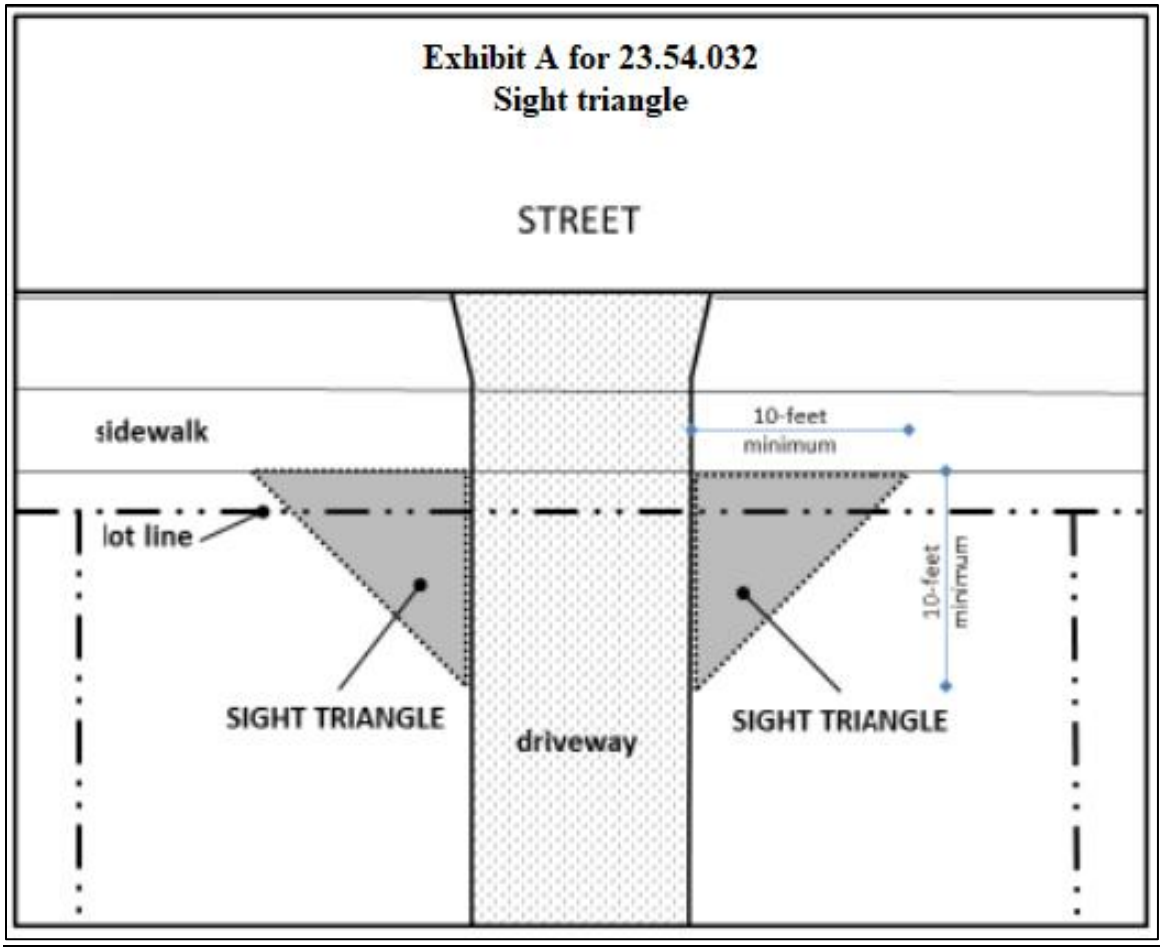
((~~G. Sight triangle~~

~~1.~~)) A. For exit-only driveways and easements, and two-way driveways and easements less than 22 feet wide, a sight triangle on both sides of the driveway or easement shall be provided, and shall be kept clear of any obstruction for a distance of 10 feet from the intersection of the driveway or easement with a driveway, easement, sidewalk, or curb intersection if there is no sidewalk, as depicted in Exhibit ((~~E for 23.54.030~~)) A for 23.54.032.

Exhibit ((~~E for 23.54.030~~)) <u>A for 23.54.032</u>

Sight triangle





((~~2.~~)) B. For two-way driveways or easements 22 feet wide or more, a sight triangle on the side of the driveway used as an exit shall be provided, and shall be kept clear of any obstruction for a distance of 10 feet from the intersection of the driveway or easement with a driveway, easement, sidewalk, or curb intersection if there is no sidewalk. The entrance and exit lanes shall be clearly identified.

((~~3.~~)) C. The sight triangle shall also be kept clear of obstructions in the vertical spaces between 32 inches and 82 inches from the ground.

((~~4.~~)) D. When the driveway or easement is less than 10 feet from the lot line, the sight triangle may be provided as follows:

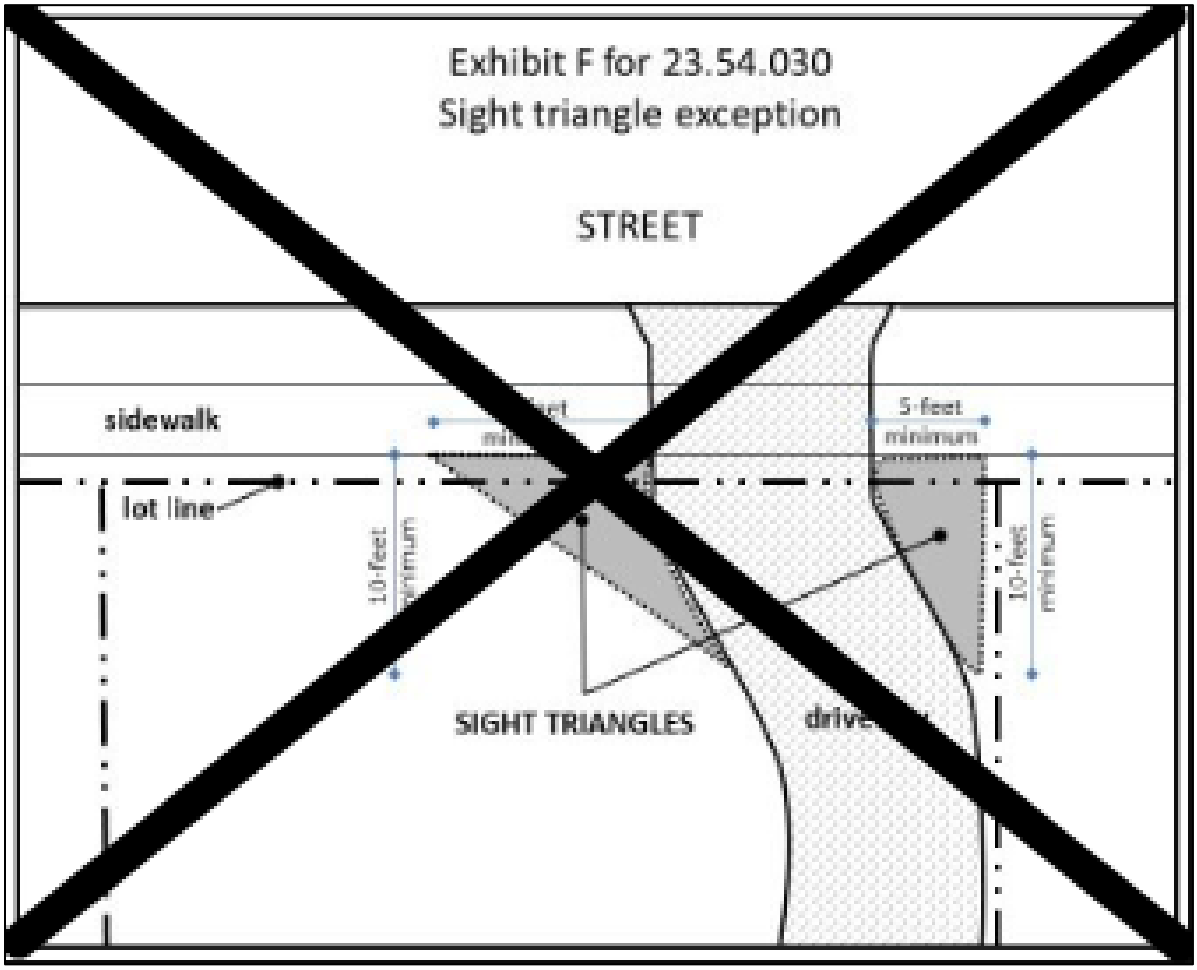
((~~a.~~)) 1. An easement may be provided sufficient to maintain the sight triangle. The easement shall be recorded with the King County Recorder's Office; or

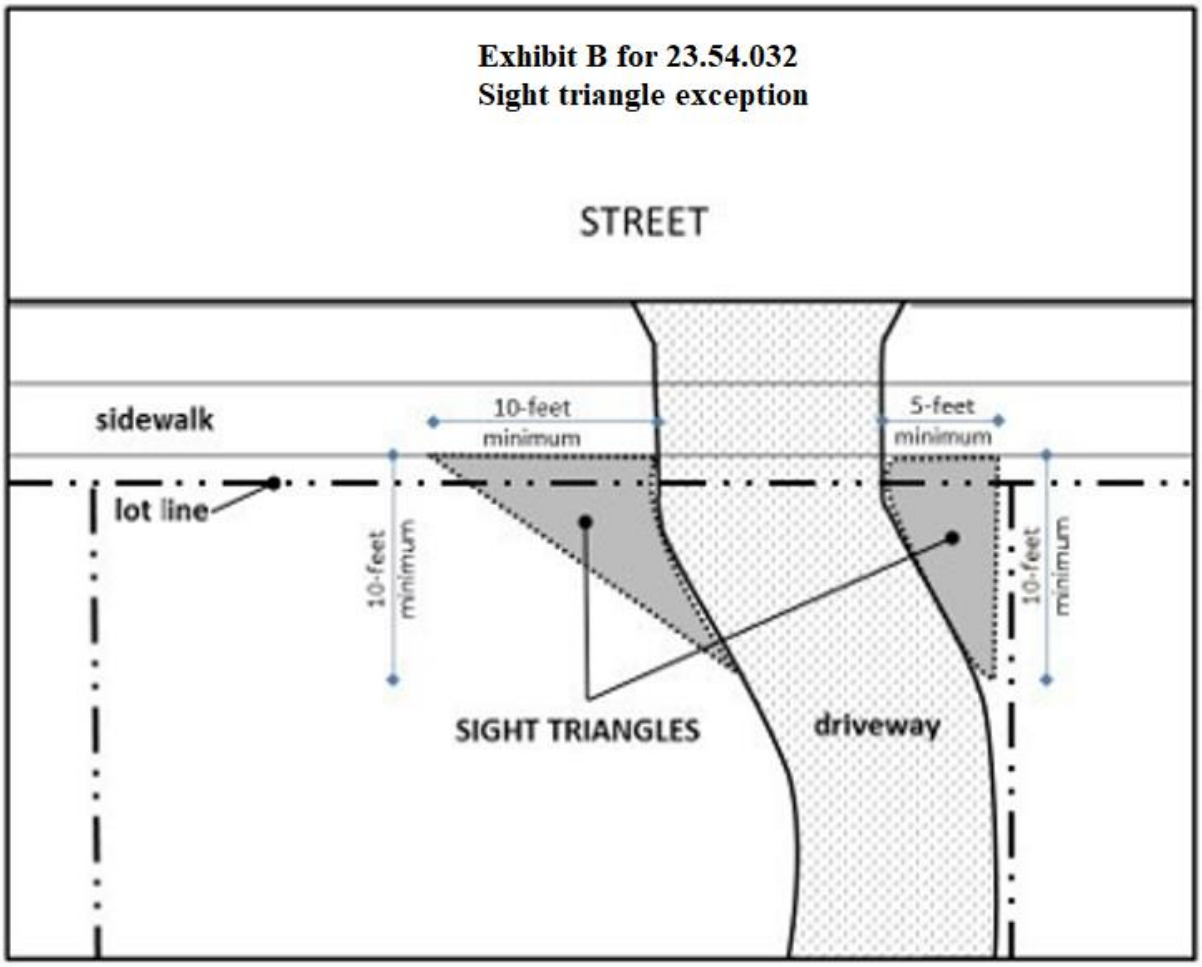
((~~b.~~)) 2. The driveway may be shared with a driveway on the neighboring lot; or

((~~c.~~)) 3. The driveway or easement may begin 5 feet from the lot line, as depicted in Exhibit ((~~F for 23.54.030~~)) B for 23.54.032.

Exhibit ((~~F for 23.54.030~~)) B for 23.54.032

Sight triangle exception





((~~5.~~)) E. An exception to the sight triangle requirement may be made for driveways serving lots containing only residential uses and fewer than three parking spaces, when providing the sight triangle would be impractical.

((~~6.~~)) F. In all ((~~Downtown, Industrial,~~)) downtown, industrial, Commercial 1, and Commercial 2 zones, the sight triangle at a garage exit may be provided by mirrors and/or other approved safety measures.

((~~7.~~)) G. Sight triangles are not required for one-way entrances into a parking garage or surface parking area.

((~~8.~~)) H. Sight triangles are not required when access to parking is provided from an alley.

* * *

Section 62. Subsections 23.54.030.K and 23.54.030.L of the Seattle Municipal Code, which section was last amended by Ordinance 127099, are amended as follows:

* * *

23.54.033 Pedestrian access to garage

((~~K. Pedestrian access to garage.~~)) For new structures that include a garage, in a zone where flexible-use parking is permitted, at least one pedestrian access walkway or route shall be provided between a garage and a public right-of-way, which may be an alley, including a side-hinged door for pedestrian use. A fire exit door, or other access through lobbies, may serve this purpose if the access route and doors are accessible for ingress and egress by garage users.

23.54.034 Electric vehicle (EV) charging infrastructure

((~~L. Electric vehicle (EV) charging infrastructure.~~)) New parking spaces provided on a lot when a new building is constructed shall be ((")EV-ready(")) as specified in this ((~~subsection 23.54.030.L~~)) Section 23.54.034. The required number of EV-ready parking spaces shall be determined by whether the parking is for a residential or nonresidential use. Parking that is clearly set aside and reserved for residential use shall meet the standards of subsection ((~~23.54.030.L.1~~)) 23.54.034.A; parking for all other uses within the structure shall meet the standards of subsection ((~~23.54.030.L.2~~)) 23.54.034.B.

((~~1.~~)) A. Residential uses

((~~a.~~)) 1. Private parking for individual ((~~residential~~)) dwelling units. When parking for any individual dwelling unit is provided in a private garage, carport, or parking

area, separate from any parking facilities serving other units, at least one parking space for each unit in that garage, carport, or surface parking area shall be EV-ready.

((~~b.~~)) 2. Surface parking for multiple ((~~residences~~)) dwelling units. When parking for ((~~multifamily residential uses~~)) multiple dwelling units is provided in a surface parking area serving multiple ((~~residences~~)) dwelling units, the number of parking spaces that shall be EV-ready shall be as follows:

((~~1) When between one and six parking spaces are provided, each of those parking spaces shall be EV-ready;~~

~~2) When between seven and 25 parking spaces are provided, a minimum of six of those parking spaces shall be EV-ready; and~~

~~3) When more than 25 parking spaces are provided, a minimum of 20 percent of those parking spaces shall be EV-ready.~~))

a. When up to 25 parking spaces are provided, the first 12 parking spaces shall be EV-ready; and

b. When more than 25 parking spaces are provided, 45 percent of all parking spaces shall be EV-ready.

((~~c.~~)) 3. Parking garages for multiple ((~~residences~~)) dwelling units. When parking for ((~~multifamily residential uses~~)) multiple dwelling units is provided in a parking garage serving multiple ((~~residences~~)) dwelling units, a minimum of ((~~20~~)) 45 percent of those parking spaces shall be EV-ready.

((~~d. Other residential uses. When parking is provided for all other residential uses, a minimum of 20 percent of those spaces shall be EV-ready.~~

~~2.~~)) B. Nonresidential uses((~~.~~))

1. When parking is provided for nonresidential uses, a minimum of ((~~ten~~)) 30 percent of those spaces shall be EV-ready((~~.~~)), except as provided in subsection 23.54.034.B.2 and subsection 23.54.034.B.3.

2. For the uses listed in subsection 23.54.034.B.3, the following requirements apply:

a. Where fewer than ten parking spaces are provided for the use, one EV-ready space is required.

b. Where ten or more parking spaces are provided for the use, 10 percent of parking spaces shall be EV-ready.

3. The following uses are subject to the alternative requirements in 23.54.034.B.2:

a. The following institutional uses:

1. Community club or center;

2. Child care center;

3. Community farm;

4. Library;

5. Museum;

6. Private club;

7. Religious facility; and

8. School, elementary or secondary;

b. Entertainment uses;

c. Eating and drinking establishments;

d. Automotive sales and services;

e. Multipurpose retail sales;

f. Heavy sales and services, except heavy commercial services; and

g. Marine sales and services.

((~~3.~~)) C. Rounding. When calculating the number of required EV-ready parking spaces, any fraction or portion of an EV-ready parking space required shall be rounded up to the nearest whole number.

((~~4.~~)) D. Reductions

((~~a.~~)) 1. The Director may, in consultation with the Director of Seattle City Light, reduce the requirements of this ((~~subsection 23.54.030.L~~)) Section 23.54.034 as a Type I decision ((~~where~~)) if there is substantial evidence ((~~substantiating~~)) that the added electrical load that can be attributed to meeting the requirements will:

((~~1~~)) a. Alter the local utility infrastructure design requirements on the utility side of the legal point of service, so as to require on-property power transformation; or

((~~2~~)) b. Require an upgrade to an existing residential electrical service.

((~~b.~~)) 2. In cases where the provisions of subsection ((~~23.54.030.L.4.a~~)) 23.54.034.D.1 have been met, the maximum quantity of EV charging infrastructure required to be installed shall be reduced to the maximum service size that would not require the changes to transformation or electrical service in subsection ((~~23.54.030.L.4.a~~)) 23.54.034.D.1. The Director may first reduce the required level of EV infrastructure at EV-ready parking spaces from 40-amp to 20-amp circuits. If necessary, the Director may also then reduce the number of required EV-ready parking spaces or otherwise reduce the level of EV infrastructure at EV-ready parking spaces.

((~~c.~~)) 3. The Director may establish by rule the procedures and documentation required for a reduction request.

((~~5.~~)) E. All EV charging infrastructure shall be installed in accordance with the Seattle Electrical Code. Where EV-ready surface parking spaces are located more than 4 feet from a building, raceways shall be extended to a pull box or stub in the vicinity of the designated space and shall be protected from vehicles.

((~~6.~~)) F. Accessible parking. Where new EV-ready parking spaces and new accessible parking are both provided, parking facilities shall be designed so that at least ((~~one~~)) 20 percent of the accessible parking spaces or two accessible parking spaces, whichever is greater, shall be EV-ready. The accessible parking EV-ready infrastructure may also serve adjacent parking spaces not designated as accessible parking. The EV-ready accessible parking spaces, rounded up to the next whole number, are allowed to be included in the total number of electric vehicle parking spaces required under 23.54.034.A. and 23.54.034.B.

((~~7.~~)) G. Nothing in this ((~~subsection 23.54.030.L~~)) Section 23.54.034 shall be construed to modify the minimum number of off-street motor vehicle parking spaces required for specific uses or the maximum number of parking spaces allowed, as set forth in Section 23.54.015 or elsewhere in this Title 23.

((~~8.~~)) H. This Section ((~~23.54.030~~)) 23.54.034 does not require EV supply equipment, as defined by Article 100 of the Seattle Electrical Code, to be installed.

Section 63. Section 23.60A.156 of the Seattle Municipal Code, last amended by Ordinance 124750, is amended as follows:

23.60A.156 Standards for environmentally critical areas in the Shoreline District

* * *

K. Subdivisions and short subdivisions

1. The standards for short subdivisions and subdivisions in Section 25.09.240 incorporated by reference into this Chapter 23.60A apply to short subdivisions and subdivisions in the Shoreline District, except as provided in subsections 23.60A.156.K.2 and 23.60A.156.K.3.

2. Subsection 25.09.240.B does not apply. Parcels shall be divided so that each lot contains an area for the principal structure, all accessory structures, and necessary walkways and access for this area that are outside the riparian corridor, wetlands, wetland buffers, and steep slope areas and buffers, except as follows:

a. Development on upland lots may be located on steep slope areas that have been created through previous legal grading activities, including rockeries or retaining walls resulting from rights-of-way improvements, if steep slope erosion is not increased as determined by the Director based on a geotechnical report; and

b. Development on upland lots may be located on steep slope areas that are less than 20 feet in vertical rise and that are 30 feet or more from other steep slope areas, if steep slope erosion is not increased as determined by the Director based on a geotechnical report.

3. Subsection ((~~25.09.240.E~~)) 25.09.240.D does not apply. In computing the number of lots a parcel in a single-family zone may contain, the Director shall exclude easements and/or fee simple property used for shared vehicular access to proposed lots that are required under Section 23.53.005.

L. ((~~Environmentally critical areas administrative conditional use. The provisions of Section 25.09.260 do not apply in the Shoreline District.~~)) Reserved.

* * *

Section 64. Subsection 23.66.030.D of the Seattle Municipal Code, which section was last amended by Ordinance 126760, is amended as follows:

23.66.030 Certificates of Approval – Application, review, and appeals

* * *

D. Review

1. Review when no special review board is established

a. When there is no special review board, the Department of Neighborhoods Director shall, within 30 days of a determination that an application for a certificate of approval is complete, determine whether the proposed action is consistent with the use and development standards for the district and shall, within 15 additional days, issue, issue with conditions, or deny the requested certificate of approval.

b. A copy of the Department of Neighborhoods Director's decision shall be sent to the Director and mailed to the owner and the applicant at the addresses provided in the application. Notice of the Director's decision also shall be provided to any person who, prior to the rendering of the decision, made a written request to receive notice of the decision or submitted written substantive comments on the application.

2. Review when special review board is established

a. When a special review board has been established, the board shall hold a public meeting to receive comments on certificate of approval applications.

b. Notice of the board's public meeting shall be posted in two prominent locations in the district at least three days prior to the meeting.

c. The board, after reviewing the application and considering the information received at the public meeting, shall make a written recommendation to the

Department of Neighborhoods Director to grant, grant with conditions, or deny the certificate of approval application based upon the consistency of the proposed action with the requirements of this Chapter 23.66, the district use and development standards, and the purposes for creating the district. The board shall make its recommendation within 30 days of the receipt of a completed application by the board staff, except that the applicant may waive the deadlines in writing for the special review board to make a recommendation or the Director of the Department of Neighborhoods to make a decision, if the applicant also waives any deadlines on the review or issuance of related permits that are under review by the Seattle Department of Construction and Inspections.

d. The Department of Neighborhoods Director shall, within 15 days of receiving the board's recommendation, issue or deny a certificate of approval or issue an approval with conditions.

e. A copy of the decision shall be sent to the Director and mailed to the owner and the applicant at the addresses provided in the application. Notice of the decision shall be provided to any person who, prior to the rendering of the decision, made a written request for notice of the decision, or submitted substantive written comments on the application.

3. Notwithstanding any contrary provision of Section 23.66.020 or Title 23, applications for certificates of approval for the following items shall be subject to the process in subsection 23.66.030.D.1 rather than the process in subsection 23.66.030.D.2:

a. The installation, removal, or alteration of: fire escapes, ducts, conduits, HVAC vents, grilles, pipes, panels (including photovoltaic panels), weatherheads, wiring, meters, utility connections, downspouts and gutters, or other similar mechanical, electrical, or telecommunication elements necessary for the normal operation of the site, building, or structure.

b. Installation, removal, or alteration((~~, or removal~~)) of minor communication utility equipment on rooftops or streetlight poles, when the location does not have impacts on other historic resources and otherwise complies with the City Design Guidelines for minor communication utilities.

c. Installation, removal, or alteration of exterior light fixtures, exterior security lighting, ((~~and~~)) or security system equipment.

d. Installation, removal, or alteration of exterior or interior signage.

e. Installation, removal, or alteration of awnings or canopies.

f. Installation, removal, or alteration((~~, or removal~~)) of window treatments, including but not limited to blinds, curtains, shades, or window film.

g. Alterations to storefront systems, if the proposed alterations are sympathetic to and do not destroy historic building materials.

h. Alteration to exterior paint colors and other finishes when painting a previously painted or otherwise finished material.

i. Installation, removal, or alteration of the following landscape elements: shrubs; perennials; annuals; and similar low-lying plantings.

j. Installation, removal, or alteration of the following site furnishings: benches; movable tables and seating; movable planters; movable water features; trash/recycling receptacles; and bike racks.

k. Installation, removal, or alteration of fences, gates, and barriers.

l. Right-of-way alterations, including but not limited to alterations to sidewalks, curbs, and the roadway.

m. Repaving and restriping of existing asphalt paved areas not within public rights-of-way.

n. Installation of improvements for accessibility compliance.

o. Installation, removal, or alteration of fire and life safety equipment.

p. Temporary emergency alterations, if the proposed replacement material used is compatible with the historic building fabric.

q. Change of use, establishment of a new use, or expansion of use, if use is a preferred use per Chapter 23.66 or applicable district rules.

r. Replacement of non-original doors and windows within original openings, when the design intent is consistent with the Secretary of the Interior's Standards for Rehabilitation.

s. Revisions to a previously approved ((~~Certificate~~)) certificate of ((~~Approval~~)) approval, where the design revisions are sympathetic to and do not destroy historic building materials.

t. Alterations or changes to accommodate seismic improvements.

4. A decision denying a certificate of approval shall state the specific reasons for the denial and explain why the proposed changes are inconsistent with the requirements of this Subchapter I and adopted use and development standards for the district.

5. Essential public facilities. No certificate of approval may be denied or conditioned in a manner that would preclude the siting of an essential public facility as provided in Chapter 23.80.

* * *

Section 65. Section 23.72.008 of the Seattle Municipal Code, last amended by Ordinance 124378, is amended as follows:

23.72.008 Uses permitted in specified areas within the Sand Point Overlay District

* * *

B. Uses ((~~Permitted Within Portions~~)) permitted within portions of Subarea B depicted on Map A for 23.72.008((~~.~~))

1. Principal ((~~Uses Permitted Outright~~)) uses permitted outright. In addition to the principal uses permitted by the provisions of Section ((~~23.44.006~~)) 23.44.020, the following principal uses are permitted outright in Subarea B as depicted on Map A for 23.72.004, subject to subsection ((~~B4:~~)) 23.72.008.B.4:

a. Custom and craft work;

b. Dry boat storage, limited to storage of non-motorized, hand-launchable boats such as kayaks, canoes, and sail boats;

c. Indoor and outdoor sports and recreation;

d. Institutions, except hospitals;

e. Lecture and meeting halls;

f. Motion picture theater not to exceed 500 seats within Building 47;

g. Offices, limited to a total of 86,000 gross square feet in the entire subarea;

h. Performing arts theaters;

i. Research and development laboratories;

j. Restaurants without drive-in lanes, limited to no more than 2,500 square feet per business establishment;

k. Storage of fleet vehicles including accessory service and repair;

l. Warehouses; and

m. General retail sales and service, up to 6,000 square feet per business establishment.

2. Accessory ((~~Uses~~)) uses. Accessory uses that meet the following standards and that are customarily incidental to the principal uses permitted outright, are permitted outright:

a. The area devoted to the accessory use is limited no more than 20 percent of the gross floor area of the principal use it serves;

b. Only principal uses permitted by this ((~~section~~)) Section 23.72.008 and by the applicable provisions of Chapter 23.60A are allowed as accessory uses.

3. When not in use as a motion picture studio, a structure with an established use as a motion picture studio as of July 18, 1997, may be used for indoor and outdoor sports and recreation.

4. Any area not occupied by structures in existence as of July 18, 1997, paved parking areas in existence as of July 18, 1997, or rights-of-way in existence as of July 18, 1997, is limited to open space, dry boat storage or recreation uses.

* * *

Section 66. Section 23.75.180 of the Seattle Municipal Code, last amended by Ordinance 124843, is amended as follows:

23.75.180 Parking

A. Parking is regulated by this Section 23.75.180 and not by Sections 23.54.015((~~,~~)) or 23.54.016((~~,~~)) or subsections 23.54.030.A((~~,~~)) or 23.54.030.B, except for bicycle parking, which is required pursuant to ((~~subsection 23.54.015.K~~)) Section 23.54.037. Parking maximums in this

Section 23.75.180 do not include parking for dwelling units existing as of January 1, 2012, so long as those units exist.

B. There is no minimum requirement for parking spaces for motor vehicles. Maximum motor vehicle parking space limits are as follows:

1. For the NW Sector, parking shall not exceed 1,350 spaces, plus 0.7 spaces per dwelling unit or live-work unit in the sector, except that up to an additional 450 parking spaces may be permitted as a special exception pursuant to Chapter 23.76. When deciding whether to grant a special exception, the Director shall consider evidence of parking demand for nonresidential uses and alternative means of transportation, including but not limited to the following:

a. Whether the additional parking will substantially encourage the use of single occupancy vehicles;

b. Characteristics of the work force and employee hours, such as multiple shifts that end when transit service is not readily available;

c. Proximity of transit lines to the lot and headway times of those lines;

d. Whether the additional parking will adversely affect vehicular and pedestrian circulation in the area; and

e. Potential for shared use of additional parking as residential or short-term parking.

2. For the NE, SE, and SW Sectors, Table A for 23.75.180 establishes maximum parking allowed based on the uses on a lot, subject to any transfer of unused parking allowance between lots in the same sector under Section 23.75.040.

((~~Table A for 23.75.180~~

~~Maximum motor vehicle parking limits for NE, SE, and SW Sectors~~))

Table A for 23.75.180
Maximum motor vehicle parking limits for NE, SE, and SW sectors

Use	Maximum parking allowed [1]
Residential	0.7 spaces/dwelling unit or live-work unit [2]
Office	1 space/1,000 square feet of gross floor area
All other uses	1 space/500 square feet of gross floor area

Footnote to Table A for 23.75.180
[1] Based on the development of one or more uses on the lot where the parking is located, subject to any transfer of unused allowance between lots in the same sector under Section 23.75.040.
[2] One additional space beyond this maximum limit shall be allowed for each dwelling unit with ((~~3~~)) three or more bedrooms.

C. Barrier-free parking is required consistent with Seattle Building Code requirements.

D. For purposes of this Section 23.75.180, all parking is classified as "surface parking," as defined in Section 23.84A.030, or as "aboveground," "partially underground," or "underground," as shown in Exhibit A for 23.75.180 and described as follows:

1. "Aboveground parking" means any portion of a parking garage where:

a. ((~~the~~)) The structure projects more than 4 feet in height above finished grade within 30 feet of a build-to line or reduced setback area; or

b. ((~~the~~)) The structure projects more than 6 feet in height above finished grade in any other location.

2. "Partially underground parking" means any portion of a parking garage where:

a. ((~~the~~)) The structure projects 4 feet or less in height above finished grade within 30 feet of a build-to line or reduced setback area; or

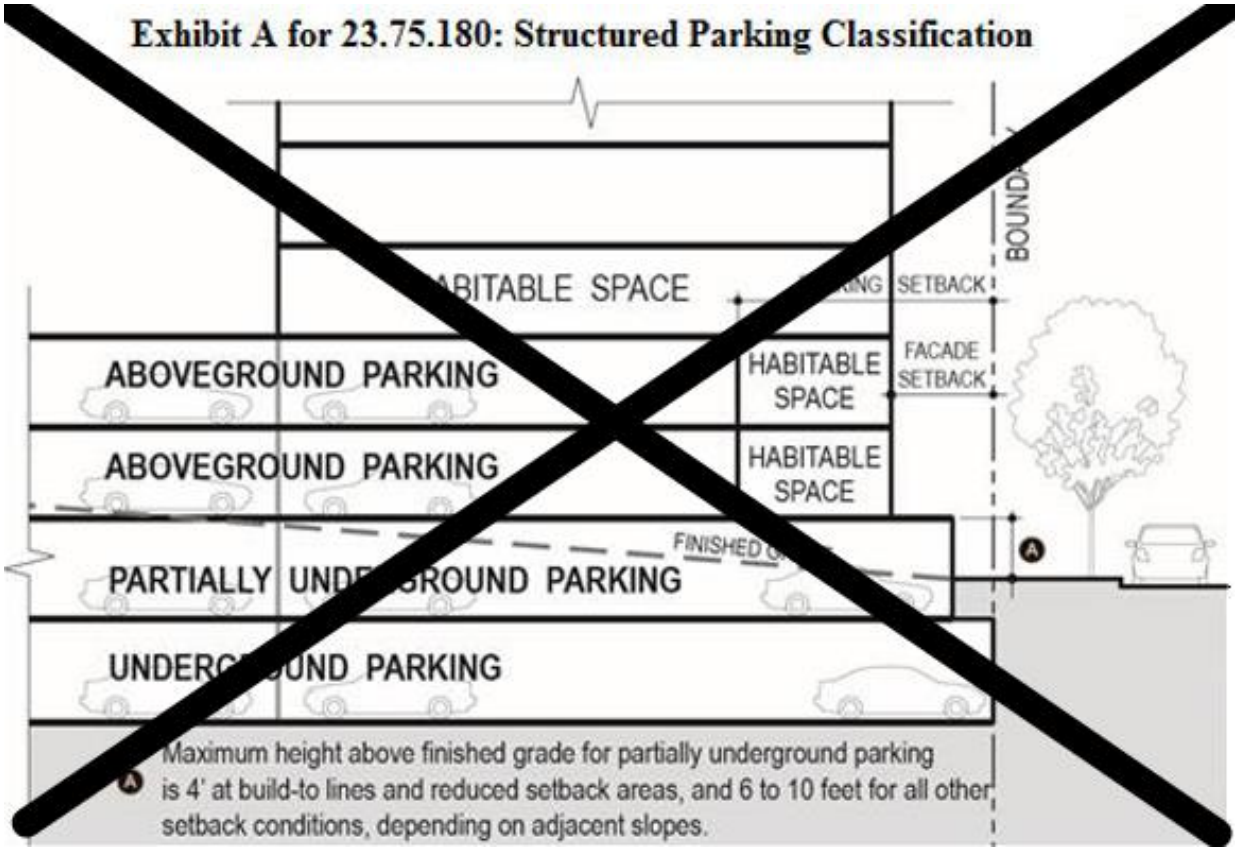
b. ((~~the~~)) The structure projects 6 feet or less in height above finished grade along any other location where the grade along the boundary has a slope of less than ((~~6~~)) six percent; or

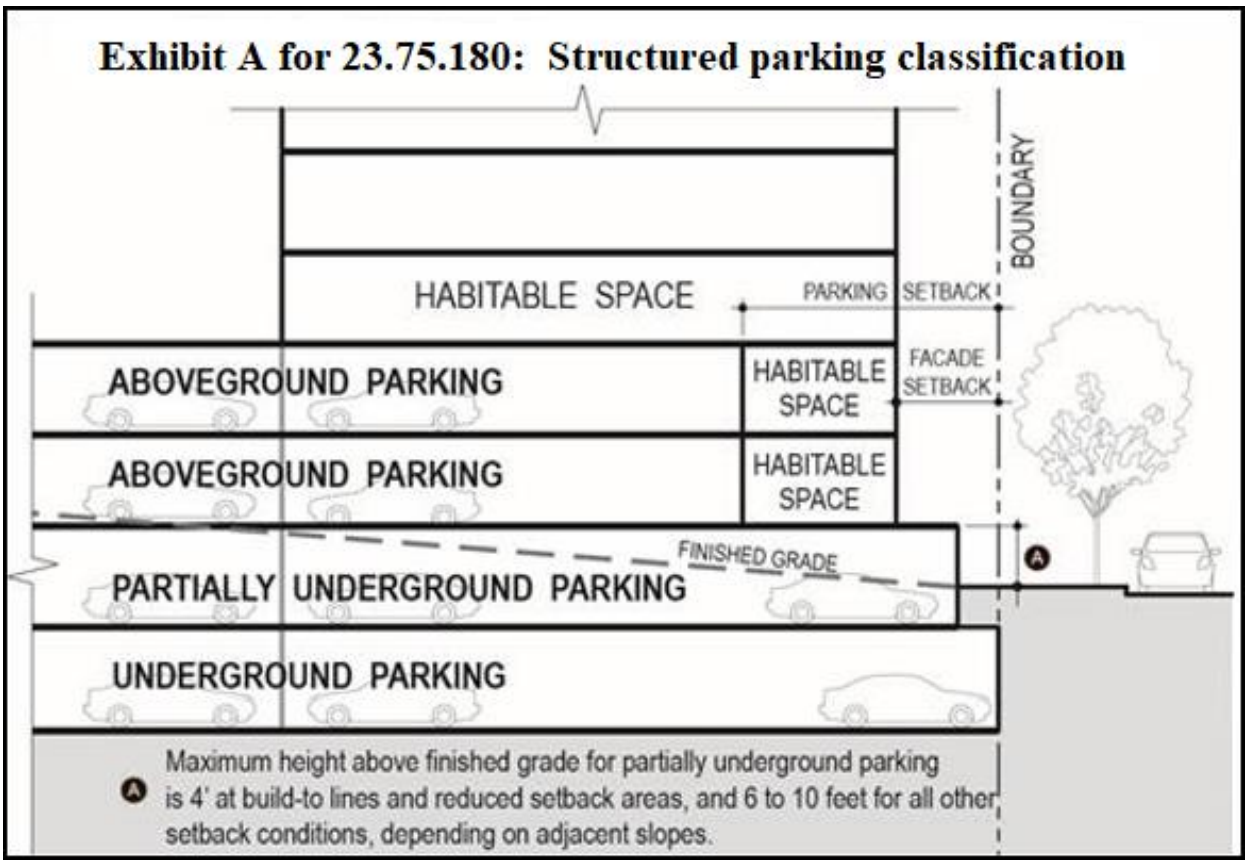
c. ((~~the~~)) The structure projects 10 feet or less in height above finished grade along any other location where the grade along the boundary has a slope of ((~~6~~)) six percent or greater.

3. "Underground parking" means a story of parking garage where all floor area, walls, and ceiling structure are entirely below finished grade, excluding access.

Exhibit A for 23.75.180

Structured ((~~Parking Classification~~)) <u>parking classification</u>





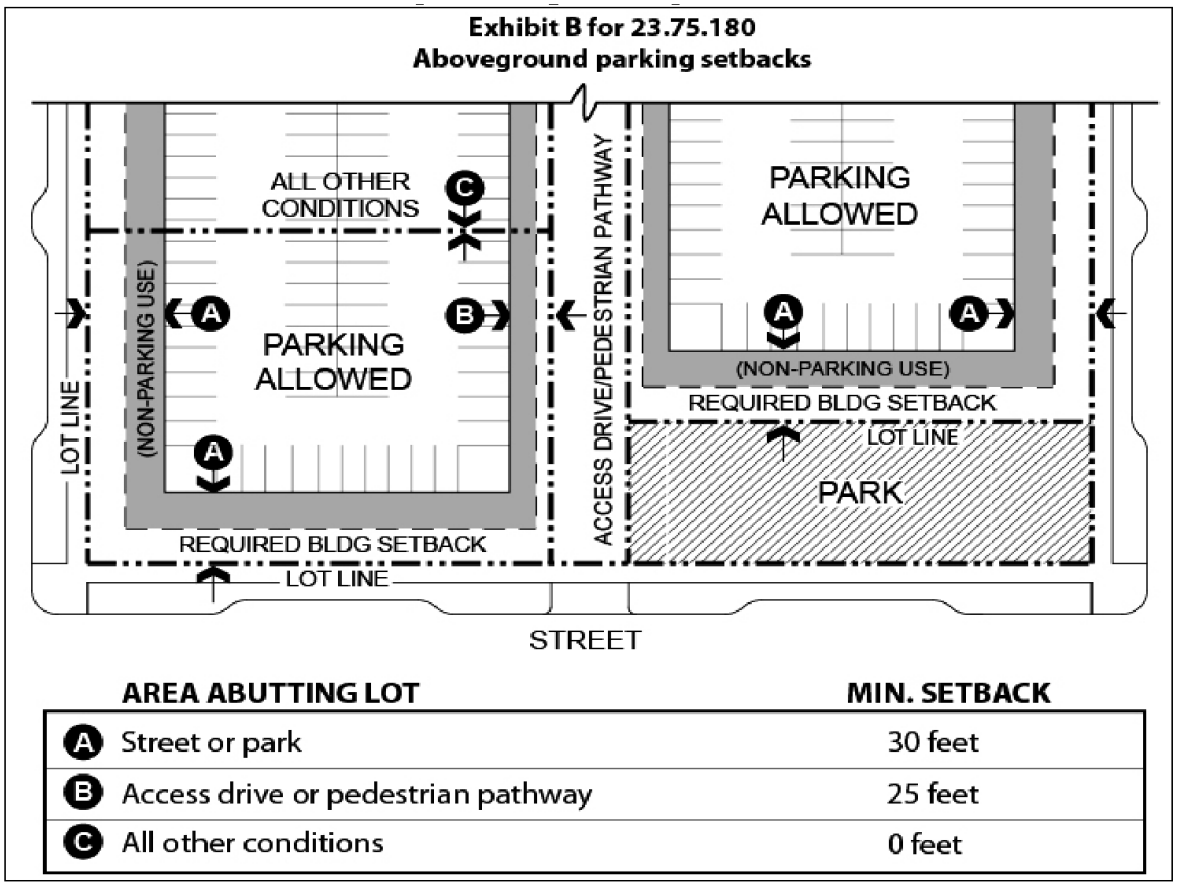
* * *

F. Aboveground parking is subject to the following requirements((.)) :

1. Minimum setbacks for aboveground parking are established in Exhibit B for 23.75.180. No parking setbacks are required from lot lines abutting the Interstate 5 right-of-way.

Exhibit B for 23.75.180

Aboveground parking setbacks



AREA ABUTTING LOT	MIN. SETBACK
A Street or park	30 feet
B Access drive or pedestrian pathway	25 feet
C All other conditions	0 feet

2. Parking within 50 feet of a street, park that is open to the public, access drive, or pedestrian pathway may not exceed three levels of aboveground parking.

3. Aboveground parking and loading areas shall be separated from each regulated facade by a normally occupied use along at least 80 percent of the width of the regulated facade, except where parking access and/or loading access occurs. The remaining part of the ((~~façade~~)) facade shall include architectural detailing, artwork, vegetated walls, or other landscape features, with an opaque screen at least 3.5 feet high on each story.

4. If aboveground parking or an aboveground loading area abuts any ((~~façade~~)) facade other than a regulated ((~~façade~~)) facade, that ((~~façade~~)) facade shall be enhanced with

architectural detailing, artwork, vegetated walls, or other landscape features. Each story shall have an opaque screen at least 3.5 feet high.

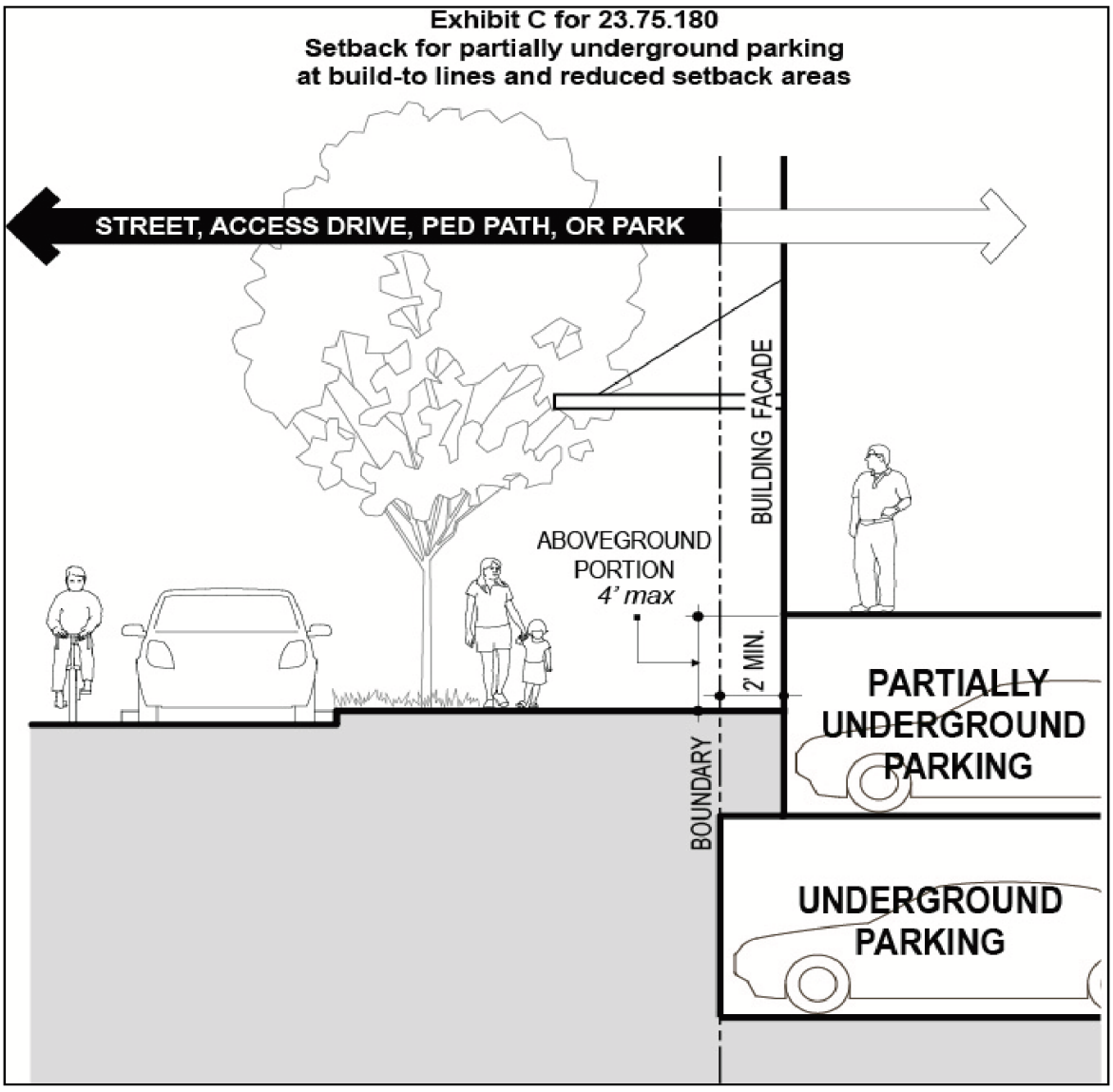
G. Partially underground parking is subject to the following requirements:

1. At build-to lines and in reduced setback areas as depicted in Exhibit C for 23.75.140, partially underground parking is required to be set back at least 2 feet from the boundary, as shown in Exhibit C for 23.75.180. In these locations, the aboveground portion of the parking garage is not allowed to exceed 4 feet above finished grade.

2. Along boundaries that do not abut a street, park that is open to the public, pedestrian pathway, or access drive, no setback is required for partially underground parking.

Exhibit C for 23.75.180

Setback for partially underground parking at build-to lines and reduced setback areas



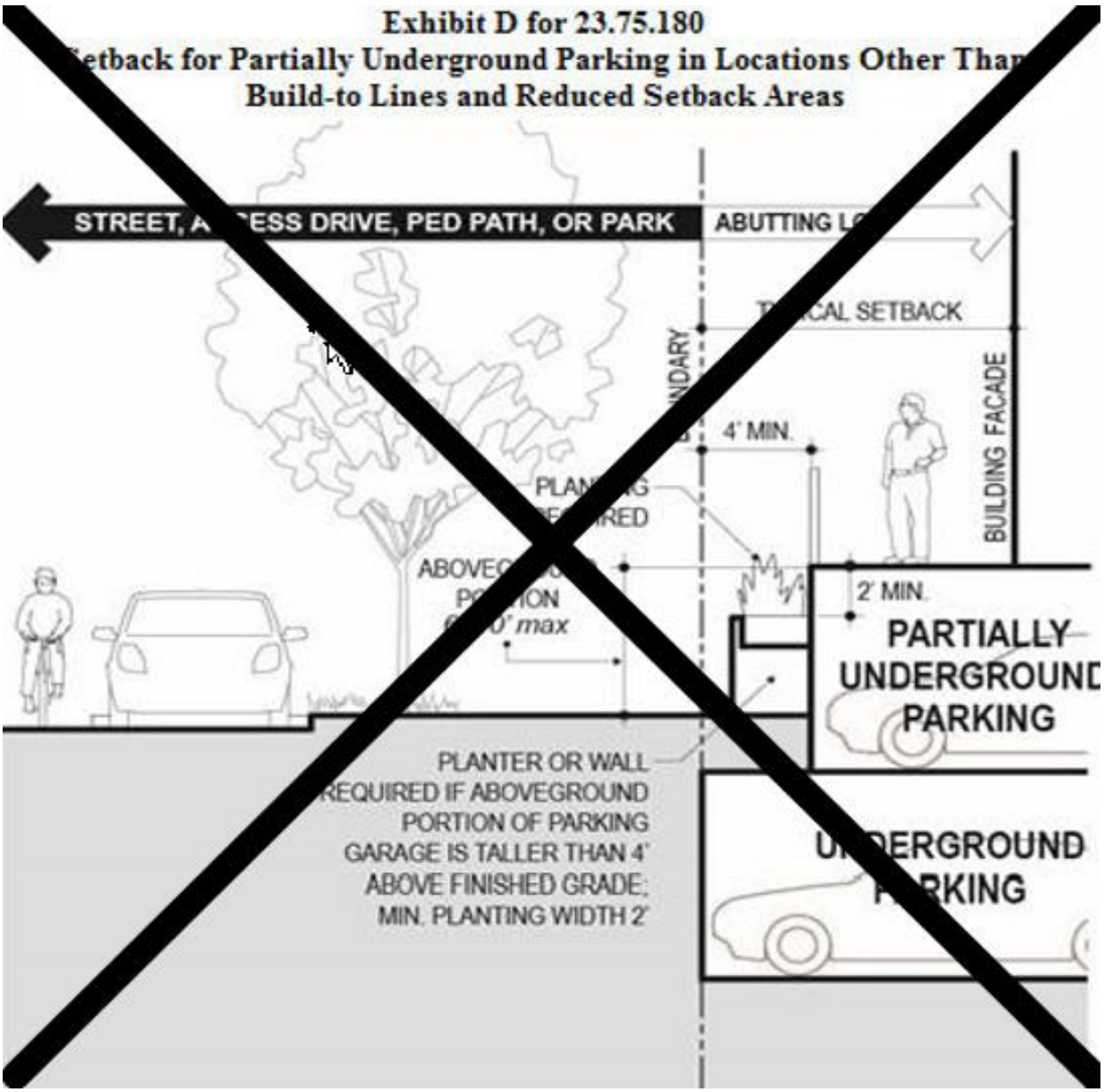
3. Along boundaries that abut a street, park that is open to the public, pedestrian pathway, or access drive and are not subject to a build-to line or reduced setback area, partially underground parking is required to be set back at least 4 feet from the boundary, as shown in Exhibit D for 23.75.180, and must meet the following standards:

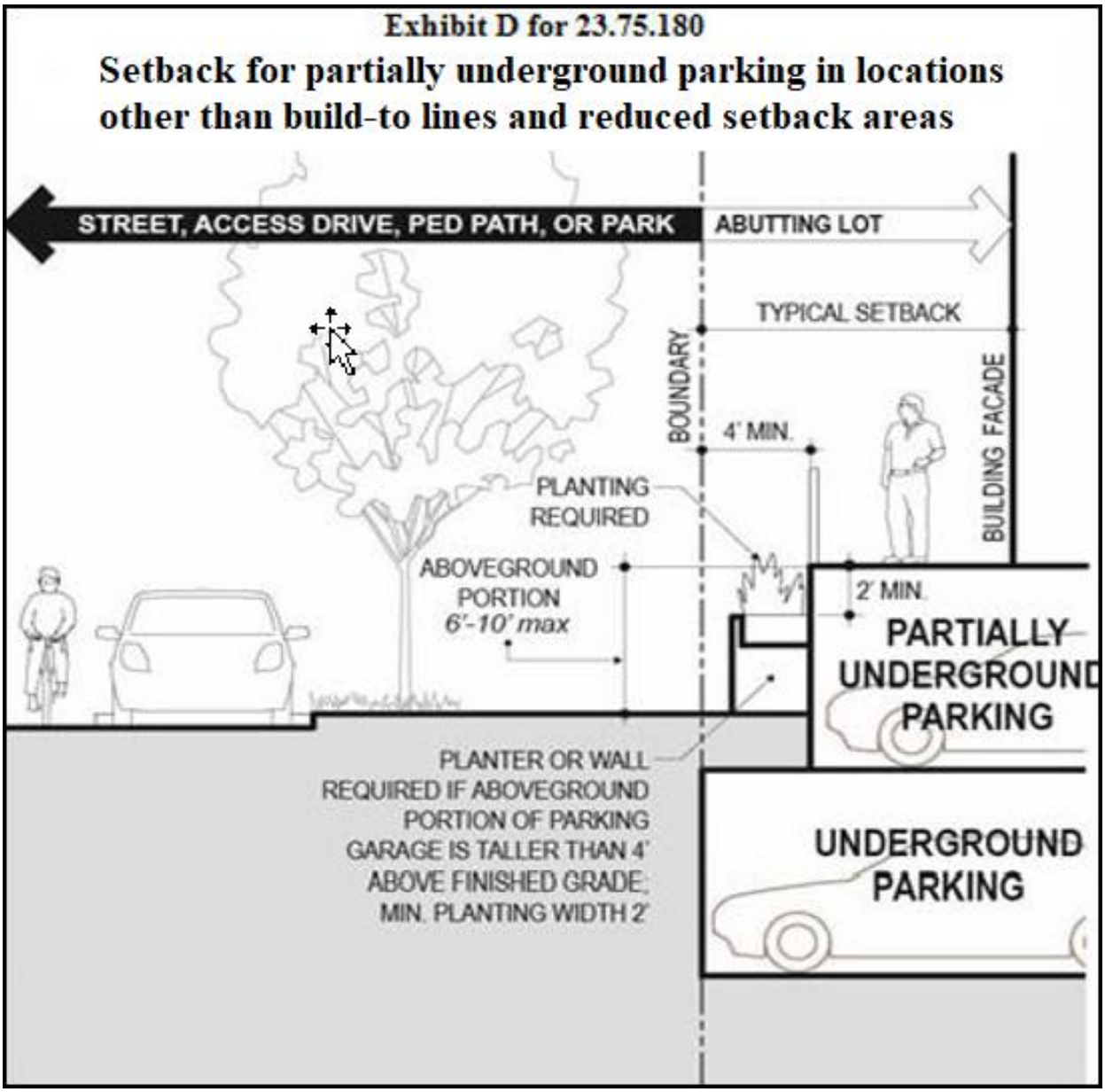
a. The aboveground portion is required to be no higher than 6 feet above the finished grade at the boundary.

b. If the aboveground portion of the parking garage is taller than 4 feet above finished grade, a wall or planter shall be provided between the parking garage and the boundary, as illustrated in Exhibit D for 23.75.180. The top of this wall or planter shall be at least ((~~two~~)) 2 feet below the top of the aboveground portion of the parking garage, and the planting area shall be at least 2 feet in width. Vegetation shall be provided at the top of this wall or planter.

Exhibit D for 23.75.180

Setback ((~~for Partially Underground Parking in Locations Other Than Build-to Lines and Reduced Setback Areas~~)) <u>for partially underground parking in locations other than build-to lines and reduced setback areas</u>





* * *

I. Parking and loading access

1. Access for parking and for loading is required to meet the following requirements:

a. Access is not allowed within 40 feet of the curb line of an intersection.

b. Access is not allowed within 20 feet of a structure corner that includes a regulated ((~~façade~~)) facade on one or both sides.

2. Each access drive is required to include a dedicated pedestrian area along at least one side of the length of the drive. The dedicated pedestrian area is required to:

a. ((~~include~~)) Include a walking surface at least 6 feet wide along the length of the access drive; and

b. ((~~be~~)) Be separated from the access drive roadway by a raised curb, bollards, landscaping, or textured paving details.

3. Curb cuts are required to meet the standards of ((~~subsections 23.54.030.F and 23.54.030.G~~)) Section 23.54.031.

4. Driveways are required to meet the standards of subsection 23.54.030.D.

Section 67. Section 23.76.064 of the Seattle Municipal Code, last amended by Ordinance 118672, is amended as follows:

23.76.064 Approval of City facilities((~~.~~))

A. Concept ((~~Approval~~)) approval for City ((~~Facilities.~~)) facilities

1. In acting on the proposed siting or expansion of a City facility, the Council shall decide whether to approve in concept the facility. If concept approval is granted, the Council may impose terms and conditions, including but not limited to design criteria and conditions relating to the size and configuration of the proposed facility.

2. Following Council approval, final plans for a City facility shall be submitted to the Director. If the Director determines that the project is consistent with the Council's concept approval, the Director shall issue the necessary permits for the facility.

3. No further Council action is required for a City facility unless the Director determines that the final plans represent a major departure from the terms of the original Council concept approval, in which case the final plan shall be submitted to the Council for approval in the same manner as the original application.

B. City ((~~Facilities Not Meeting Development Standards~~)) facilities not meeting development standards. The Council may waive or modify applicable development standards, accessory use requirements, special use requirements, or conditional use criteria for City facilities. If a waiver or modification of a development regulation is sought because the development regulation would otherwise preclude the siting of an essential public facility, then the decision to waive or modify shall be made pursuant to Chapter 23.80 and not this Section 23.76.064.

Section 68. Subsection 23.80.004.B of the Seattle Municipal Code, which section was last amended by Ordinance 124105, is amended as follows:

23.80.004 Review criteria((.))

* * *

B. ((~~If~~)) Except as provided in subsection 23.80.004.C, if the decisionmaker determines that attaching conditions to the permit approval will facilitate project siting in light of the considerations identified above, the decisionmaker may establish conditions for the project for that purpose. However, the decisionmaker may waive or modify development regulations only to the extent that a waiver or modification is approved pursuant to Section 23.80.010.

* * *

Section 69. A new Section 23.80.006 is added to the Seattle Municipal Code as follows:

23.80.006 Identifying new types of essential public facilities

The Director may, as a Type I decision, determine that a facility not otherwise listed in the definition of an essential public facility in Section 23.84A.010 is an essential public facility if:

A. The facility provides or is necessary to provide a public service; and

B. Any of the following conditions exist:

1. The public facility needs a specific type of site of such a size, location, or availability of public services for which there are few choices;

2. The public facility needs to be located near another public facility or is an expansion of an essential public facility at an existing location;

3. The public facility has significant adverse impacts that make it difficult to site;

4. Use of the normal development review process would effectively preclude the siting of an essential public facility; or

5. Development regulations require the proposed facility to use an essential public facility siting process.

Section 70. A new Section 23.80.008 is added to the Seattle Municipal Code as follows:

23.80.008 Review is supplementary

Review of an essential public facility, except for light rail facilities, under this Chapter 23.80, including a decision to condition approval of a project or to waive or modify a development regulation as authorized by this Chapter 23.80, is part of the decision to approve or deny a permit application and is not a separate or distinct regulatory decision. If the underlying decision is subject to administrative appeal, then decisions made under this Chapter 23.80 are subject to review on administrative appeal of the underlying decision. If the underlying decision is not subject to administrative appeal, then decisions made under this Chapter 23.80 are not subject to review on administrative appeal of the underlying decision.

Section 71. A new Section 23.80.010 is added to the Seattle Municipal Code as follows:

23.80.010 Waiver or modification of development regulation

A. Application for waiver or modification. If the applicant for approval of an essential public facility seeks the waiver or modification of a development regulation, the applicant shall include in the application:

1. The specific identification of each development regulation sought to be waived or modified;

2. A detailed explanation of the manner in which each development regulation is believed to preclude the siting of the essential public facility; and

3. A detailed description of any mitigation measures the applicant proposes to take to avoid or mitigate the adverse effects that may result from the proposed waiver or modification of the development regulation.

B. Decision to waive or modify. If the decisionmaker determines that application of a development regulation will preclude the siting of an essential public facility, the decisionmaker shall waive or modify the application of the development regulation to the extent necessary to allow siting the facility. The decisionmaker shall consider the provisions of WAC 365-196-550 when deciding whether a development regulation precludes the siting of the facility.

C. Mitigation. If the decisionmaker waives or modifies a development regulation, the decisionmaker may require the applicant to comply with conditions that avoid or mitigate adverse effects that the decisionmaker believes may result from waiver or modification of the development regulation. If the development regulation to be waived or modified is contained in Chapter 23.60A or Chapter 25.09, and the waiver or modification would result in a net loss of

ecological function, the decisionmaker shall impose mitigation conditions to achieve no net loss of ecological functions as a result of granting the waiver or modification.

D. Relationship to other provisions authorizing exceptions, variances, exemptions, and other forms of relief

1. Except as provided in subsection 23.80.010.D.2, regardless of any other provision of this Title 23, Chapter 25.09, or Chapter 25.11, if an applicant seeks the waiver or modification of a development regulation under this Section 23.80.010, the applicant is not required to also seek relief from the application of the development regulation pursuant to any other form of relief afforded by the Seattle Municipal Code, including procedures for exceptions, variances, exemptions, and similar procedures. However, an applicant is not precluded from seeking such other relief in addition to relief under this Section 23.80.010.

2. When the waiver or modification sought under this Section 23.80.010 is of a development regulation contained in Chapter 23.60A, the applicant must seek relief from the development regulation pursuant to the procedures set forth in Chapter 23.60A. In the event that relief cannot be granted under those procedures, the development regulation may be waived or modified under this Section 23.80.010.

E. Exemption for light rail facilities. This Section 23.80.010 does not apply to light rail facilities. Development standards for light rail facilities may be waived or modified pursuant to subsection 23.80.004.C.

Section 72. Section 23.84A.002 of the Seattle Municipal Code, last amended by Ordinance 126855, is amended as follows:

23.84A.002 "A"

* * *

"Adult family home((.))" ((~~See "Residential use."~~)) means the occupation of a dwelling unit by an adult family home defined and licensed as such by the State of Washington under chapter 70.128 RCW.

* * *

Section 73. Section 23.84A.006 of the Seattle Municipal Code, last amended by Ordinance 127099, is amended as follows:

23.84A.006 "C"

* * *

((~~"Carriage House" See "Residential use."~~

~~"Carriage House structure" See "Residential use".~~))

* * *

((~~"Cottage, backyard." See "detached accessory dwelling unit" under the definition of "Residential use" in Section 23.84A.032.~~))

* * *

Section 74. Section 23.84A.008 of the Seattle Municipal Code, last amended by Ordinance 127211, is amended as follows:

23.84A.008 "D"

* * *

((~~"Duplex" means a single structure containing only two dwelling units, neither of which is a legally established accessory dwelling unit.~~))

"Dwelling unit" means a room or rooms located within a structure that are configured to meet the standards of Section 23.42.048 ((~~and that are occupied or intended to be occupied by not more than one household as living accommodations independent from any other~~

~~household.~~)) , providing independent living facilities for one household, including permanent provisions for sleeping, food preparation, and sanitation.

"Dwelling unit, accessory((~~.~~))" ((~~See "Residential use."~~)) means a dwelling unit that:

1. Is located within the same structure as a principal dwelling unit or within an accessory structure on the same lot as a principal dwelling unit; and

2. Is designed and arranged to be occupied as living facilities independent from any other dwelling unit.

"Dwelling unit, attached" means a dwelling unit that:

1. Occupies space from the ground to the roof of the structure in which it is located; and

2. Is attached to another dwelling unit. Dwelling units are considered attached if they share a common or party wall or have walls containing floor area that are located within 2 feet of each other.

"Dwelling unit, detached" means a dwelling unit that:

1. Occupies space from the ground to the roof of the structure in which it is located; and

2. Is not attached to any other dwelling unit.

((~~"Dwelling unit, detached accessory." Also known as a backyard cottage. See "detached accessory dwelling unit" under the definition of "Residential use" in Section 23.84A.032.~~))

"Dwelling unit, principal" means a dwelling unit that is not accessory to another dwelling unit.

"Dwelling unit((–)), small efficiency" means a dwelling unit with an amount of square footage less than the minimum amounts specified for Efficiency Dwelling Units in the Seattle Building Code, and that meets the standards prescribed in Section 23.42.048.

"Dwelling unit, stacked" means dwelling units that are located above or below other dwelling units such as apartments or condominium buildings.

Section 75. Section 23.84A.010 of the Seattle Municipal Code, last amended by Ordinance 126685, is amended as follows:

23.84A.010 "E"

* * *

"Essential public facilities" ((~~within the City of Seattle~~)) means ((~~airports,~~)) sewage treatment plants, ((~~jails,~~)) light rail transit systems, ((~~and~~)) power plants, any facilities identified as an essential public facility in RCW 36.70A.200, and any facility determined to be an essential public facility pursuant to Section 23.80.006.

"EV-ready" means a minimum 40-ampere dedicated 208- or 240-volt branch circuit (32-amp load) terminated at a junction box or receptacle outlet in close proximity to a parking space.

* * *

Section 76. Section 23.84A.016 of the Seattle Municipal Code, last amended by Ordinance 127099, is amended as follows:

23.84A.016 "H"

* * *

"Housing, low-income" means a structure or structures for which:

1. An application for public funding for the capital costs of development or rehabilitation of the structure(s) has been or will be submitted; and

2. ((~~Public~~)) A written notice of public funding ((~~is awarded~~)) award, including terms, is received prior to issuance of the ((~~first~~)) building permit, which for development projects shall be the first building permit that includes the structural frame for each structure, and such funding is conditioned on one or more regulatory agreements, covenants, or other legal instruments, recorded on the title of the property and enforceable by The City of Seattle, King County, State of Washington, Washington State Housing Finance Commission, or other public agency, if approved by the Director of Housing, ((~~being executed and recorded on the title of the property that includes the low-income housing and such legal instruments either:~~

~~a. For a minimum period of 40 years, require rental of at least 40 percent of the dwelling units, small efficiency dwelling units, or congregate residence sleeping rooms as restricted units with rent and income limits no higher than 60 percent of median income; or~~

~~b. For a minimum period of 50 years, require at least 40 percent of the dwelling units as restricted units sold to buyers with incomes no higher than 80 percent of median income at prices (initial sale and resale) to allow modest growth in homeowner equity while maintaining long-term affordability for income-eligible buyers, all as determined by the Director of Housing~~)) that ensure at least 50 percent of total dwelling units shall be low-income units.

* * *

Section 77. Section 23.84A.018 of the Seattle Municipal Code, last amended by Ordinance 126862, is amended as follows:

23.84A.018 "I"

* * *

"Institution" means ((~~structures(s)~~)) structures and related grounds used by organizations for the provision of educational, medical, cultural, social, and/or recreational services to the community, including but not limited to the following uses:

1. "Adult care center" means an institution that regularly provides care to a group of adults for less than 24 hours a day, whether for compensation or not.

2. "College" means a post-secondary educational institution, operated by a nonprofit organization, granting associate, bachelor, and/or graduate degrees.

3. "Community club or center" means an institution used for athletic, social, civic, cultural, artistic, or recreational purposes, operated by a nonprofit organization, and open to the general public on an equal basis. Activities in a community club or center may include, but are not limited to, classes and events sponsored by nonprofit organizations, community programs for the elderly, social gatherings, educational programming, gardens, and art exhibits((~~,~~)).

a. "Community center" means a community club or center use, providing direct services to people on the premises rather than carrying out only administrative functions, that is open to the general public without membership. Community centers may include accessory commercial uses including but not limited to commercial kitchens and food processing, craft work and maker spaces, cafes, galleries, co-working spaces, health clinics, office spaces, and retail sales of food and goods.

b. "Community club" means a community club or center use((~~, membership~~)) to which membership is open to the general public on an equal basis.

4. "Child care center" means an institution that regularly provides care to a group of children for less than 24 hours a day, whether for compensation or not. Preschools,

cooperative child care exchanges, and drop-in centers where children receive care by the day ((~~shall be~~)) are considered to be child care centers.

5. "Community farm" means an institution, operated by a nonprofit organization, in which land and related structures are primarily used to grow or harvest plants for food, educational, cultural, or ecological restoration purposes, or to keep animals in accordance with Section 23.42.052. Additional activities may include but are not limited to indoor and outdoor classes and events, food processing and preparation, community programs and gatherings, and the sale of plants, harvested or prepared food, ornamental crops, and animal products such as eggs or honey but not including the slaughtering of animals or birds for meat.

6. ((~~"Family support center" means an institution that offers support services and instruction to families, such as parenting classes and family counseling, and is co-located with a Department of Parks and Recreation community center.~~

~~7.~~)) "Hospital" means an institution other than a nursing home that provides accommodations, facilities, and services over a continuous period of 24 hours or more, for observation, diagnosis, and care of individuals who are suffering from illness, injury, deformity, or abnormality or from any condition requiring obstetrical, medical, or surgical services, or alcohol or drug detoxification.

((~~8.~~)) 7. "Institute for advanced study" means an institution operated by a nonprofit organization for the advancement of knowledge through research, including the offering of seminars and courses, and technological and/or scientific laboratory research.

((~~9.~~)) 8. "Library" means an institution where literary, musical, artistic, or reference materials are kept for use but not generally for sale.

((~~10.~~)) 9. "Museum" means an institution operated by a nonprofit organization as a repository of natural, scientific, historical, cultural, or literary objects of interest or works of art, and where the collection of such items is systematically managed for the purpose of exhibiting them to the public.

((~~11.~~)) 10. "Private club" means an institution used for athletic, social, or recreational purposes and operated by a private nonprofit organization, ((~~membership~~)) to which membership is by written invitation and election according to qualifications in the club's charter or bylaws and the use of which is generally restricted to members and their guests.

((~~12.~~)) 11. "Religious facility" means an institution, such as a church, temple, mosque, synagogue, or other structure, together with its accessory structures, used primarily for religious worship.

((~~13.~~)) 12. "School, elementary or secondary" means an institution operated by a public or nonprofit organization primarily used for systematic academic or vocational instruction through the twelfth grade.

((~~14.~~)) 13. "School, vocational or fine arts" means an institution that teaches trades, business courses, hairdressing, and similar skills on a post-secondary level, or that teaches fine arts such as music, dance, or painting to any age group, whether operated for nonprofit or profit-making purposes, except businesses that provide training, instruction, or lessons exclusively on an individual basis, which are classified as general retail sales and service uses, and except those businesses accessory to an indoor participant sports use.

((~~15.~~)) 14. "University." See "College."

Section 78. Section 23.84A.024 of the Seattle Municipal Code, last amended by Ordinance 126855, is amended as follows:

23.84A.024 "L"

* * *

"Lot line, front" means: ((~~, in the case of a lot with frontage on a single street, the lot line separating the lot from the street, and in the case of a lot with frontage on more than one street other than a through lot, the lot line separating the lot from any abutting street, provided the other lot line(s) that abut streets are considered to be either side street lot line(s) or the rear lot line according to the definitions of those terms. In the case of a through lot, the lot lines separating the lot from the streets that are parallel or within 15 degrees of parallel to each other are both front lines. For new development on a lot with no street frontage, the front lot line shall be the lot line designated by the project applicant in accordance with Section 23.86.010. If the area of the front yard based on a front lot line determined according to this definition is less than 20 percent of the total lot area and is less than 1,000 square feet in area, the Director may designate a different lot line as the front lot line in order to provide structural setbacks, building separations, and open space that are more consistent with those of other lots that are within 100 feet of the property.~~))

1. For a lot with frontage on a single street, the lot line separating the lot from the street;

2. For a through lot, all lot lines separating the lot from the streets that are parallel or within 15 degrees of parallel to each;

3. For a lot with frontage on more than one street other than a through lot, a lot line determined by the Director based on the existing pattern of lots and buildings on the block; and

4. For a lot with no street frontage:

a. On a lot that has only one alley lot line, the alley lot line;

b. On a lot that has more than one alley lot line, one alley lot line determined by the Director based on existing pattern of lots and buildings on the alleys; and

c. On a lot that has no alley lot lines, a lot line chosen by the applicant, provided that the selected front lot line length is at least 50 percent of the width of the lot.

* * *

Section 79. Section 23.84A.025 of the Seattle Municipal Code, last amended by Ordinance 127099, is amended as follows:

23.84A.025 "M"

* * *

"Major retail store" means a structure or portion of a structure that provides adequate space of at least ((~~eighty thousand (~~)) 80,000 ((~~)~~)) square feet to accommodate the merchandising needs of a major new retailer with an established reputation, and providing a range of merchandise and services, including both personal and household items, to anchor downtown shopping activity around the retail core, thereby supporting other retail uses and the area's vitality and regional draw for customers.

"Major transit service." See "Transit service, major."

"Major transit stop." See "Transit stop, major."

* * *

((~~"Multifamily residential structure" means a structure containing only multifamily residential uses and permitted uses accessory to the multifamily residential uses.~~

~~"Multifamily structure." See "Residential use."~~))

* * *

Section 80. Section 23.84A.030 of the Seattle Municipal Code, last amended by Ordinance 127099, is amended as follows:

23.84A.030 "P"

* * *

"Permanent supportive housing." ((~~means low-income housing that is paired with on or off-site voluntary human services to support people living with complex and disabling behavioral health or physical health conditions and experiencing homelessness or at imminent risk of homelessness prior to moving into such housing.~~)) See "Residential use, permanent supportive housing."

* * *

((~~"Planned community development (PCD)" means a zoning process that authorizes exceptions from certain development standards for structures on large tracts of land in certain downtown zones. A PCD is developed as a single entity through a public process.~~

~~"Planned residential development (PRD)" means a zoning mechanism that allows for flexibility in the grouping, placement, size and use of structures on a fairly large tract of land. A PRD is developed as a single entity, using a public process that incorporates design review.~~))

* * *

Section 81. Section 23.84A.032 of the Seattle Municipal Code, last amended by Ordinance 127211, is amended as follows:

23.84A.032 "R"

* * *

"Residential use" means ((~~any one or more of~~)) a use in one or more structures, including interior and exterior accessory spaces, in which people primarily live including the following uses:

1. ((~~"Accessory dwelling unit" means a dwelling unit that:~~

~~a. Is located within or attached to a structure containing a principal dwelling unit or within an accessory structure on the same lot as principal dwelling unit(s); and~~

~~b. Is designed, arranged, and intended to be occupied as living facilities independent from any other dwelling unit.~~

~~2. "Attached accessory dwelling unit" means an accessory dwelling unit that is within or attached to a structure containing a principal dwelling unit.~~

~~3. "Adult family home" means an adult family home defined and licensed as such by the State of Washington in a dwelling unit.~~

~~4. "Apartment" means a multifamily residential use that is not a cottage housing development, rowhouse development, or townhouse development.~~

~~5.~~)) "Artist's studio/dwelling" means a combination working studio and dwelling unit for artists, consisting of a room or suite of rooms occupied by not more than one household.

((~~6.~~)) 2. "Assisted living facility" means a ((~~use licensed by the State of Washington as a~~)) boarding home licensed by the State of Washington that contains at least two assisted living units for people who have either a need for assistance with activities of daily living (which are defined as eating, toileting, ambulation, transfer (e.g., moving from bed to chair or chair to bath), and bathing) or some form of cognitive impairment but who do not need the skilled critical care provided by nursing homes. See "Assisted living unit."

((~~7. "Carriage house" means a dwelling unit in a carriage house structure.~~

~~8. "Carriage house structure" means a structure within a cottage housing development, in which one or more dwelling units are located on the story above an enclosed parking garage at ground level that either abuts an alley and has vehicle access from that alley, or is located on a corner lot and has access to the parking in the structure from a driveway that abuts and runs parallel to the rear lot line of the lot. See also "Carriage house."~~

~~9.~~)) 3. "Caretaker's quarters" means a ((~~use accessory to a non-residential use consisting of a~~)) dwelling unit not exceeding 800 square feet of living area ((~~and~~)) that is occupied by a caretaker or watchperson and accessory to a nonresidential use.

((~~10.~~)) 4. "Congregate residence" means a use in which sleeping rooms are independently rented and lockable and provide living and sleeping space, and residents share kitchen facilities and other common elements with other residents in a building.

((~~11. "Cottage housing development" means a use consisting of cottages arranged on at least two sides of a common open space or a common amenity area. A cottage housing development may include a carriage house structure. See "Cottage," "Carriage house," and "Carriage house structure."~~

~~12. "Detached accessory dwelling unit" means an accessory dwelling unit in an accessory structure.~~

~~13. "Domestic violence shelter" means a structure or portion of a structure managed by a nonprofit organization, which unit provides housing at a confidential location and support services for victims of domestic violence.~~

~~14. "Floating home" means a dwelling unit constructed on a float that is moored, anchored, or otherwise secured in the water.~~

~~15. "Low-income housing."~~))

5. “Housing” means one or more dwelling units with permanent foundations or moorage at a marina that are not defined as another type of residential use in this definition.

((~~16.~~)) 6. "Mobile home" means a structure that is designed and constructed to be transportable in one or more sections and built on a permanent chassis, designed to be used as a dwelling unit without a permanent foundation, and connected to utilities that include plumbing, heating, and electrical systems. A structure that was transportable at the time of manufacture is still considered to meet this definition notwithstanding that it is no longer transportable.

((~~17. "Mobile home park" means a tract of land that is rented for the use of more than one mobile home occupied as a dwelling unit.~~

~~18. "Multifamily residential use" means a use consisting of two or more dwelling units in a structure or portion of a structure, excluding accessory dwelling units, or a congregate residence.~~

~~19. "Nursing home" means a use licensed by the State of Washington as a nursing home, that provides full-time convalescent and/or chronic care for individuals who, by reason of chronic illness or infirmity, are unable to care for themselves, but that does not provide care for the acutely ill or surgical or obstetrical services. This definition excludes hospitals or sanitariums.~~

~~20.~~)) 7. "Permanent supportive housing((~~.~~))" means low-income housing that is paired with on- or off-site voluntary human services to support people living with complex and disabling behavioral health or physical health conditions and experiencing homelessness or at imminent risk of homelessness prior to moving into such housing.

((~~21. "Rowhouse development" means a multifamily residential use in which all principal dwelling units on the lot meet the following conditions:~~

~~a. Each dwelling unit occupies the space from the ground to the roof of the structure in which it is located;~~

~~b. No portion of a dwelling unit, except for an accessory dwelling unit or shared parking garage, occupies space above or below another dwelling unit;~~

~~c. Each dwelling unit is attached along at least one common wall to at least one other dwelling unit, with habitable interior space on both sides of the common wall, or abuts another dwelling unit on a common lot line;~~

~~d. The front of each dwelling unit faces a street lot line;~~

~~e. Each dwelling unit provides pedestrian access directly to the street that it faces; and~~

~~f. No portion of any other dwelling unit, except for an attached accessory dwelling unit, is located between any dwelling unit and the street faced by the front of that unit.~~

~~22. "Single-family dwelling unit" means a detached principal structure having a permanent foundation, containing one dwelling unit, except that the structure may also contain one or two attached accessory dwelling units where expressly authorized pursuant to this Title 23. A detached accessory dwelling unit is not considered a single-family dwelling unit for purposes of this Chapter 23.84A.~~

~~23. "Townhouse development" means a multifamily residential use that is not a rowhouse development, and in which:~~

~~a. Each dwelling unit occupies space from the ground to the roof of the structure in which it is located;~~

~~b. No portion of a dwelling unit occupies space above or below another dwelling unit, except for an attached accessory dwelling unit and except for dwelling units constructed over a shared parking garage, including shared parking garages that project up to 4 feet above grade; and~~

~~c. Each dwelling unit is attached along at least one common wall to at least one other dwelling unit, with habitable interior space on both sides of the common wall, or abuts another dwelling unit on a common lot line.~~))

* * *

Section 82. Section 23.84A.036 of the Seattle Municipal Code, last amended by Ordinance 126157, is amended as follows:

23.84A.036 "S"

* * *

"Short subdivision" means the division or redivision of land into nine (((~~9~~))) or fewer lots, tracts, parcels, sites, or divisions for the purpose of sale, lease, development, or financing.

"Short subdivision, zero lot line" means a short subdivision that conforms to the unit lot subdivision standards in Section 23.24.045.

* * *

"Solar collector" means ((~~any~~)) a device used to collect direct sunlight for use in the heating or cooling of a structure, domestic hot water, ((~~or~~)) swimming pool, or the generation of electricity, including photovoltaic panels and solar thermal panels.

((~~"Solar greenhouse" means a solar collector that is a structure or portion of a structure utilizing glass or similar glazing material to collect direct sunlight for space heating purposes.~~))

* * *

"Structure, accessory." See "Accessory structure."

"Structure, attached" means a structure that shares a common or party wall with another structure or have walls containing floor area that are located within 2 feet of another structure.

"Structure, detached" means a structure ((~~having no common or party wall with another structure~~)) that is not attached to any other structure.

* * *

"Subdivision" means the division or redivision of land into ten ((~~(10)~~)) or more lots, tracts, parcels, sites, or divisions for the purpose of sale, lease, or transfer of ownership.

"Subdivision, zero lot line" means a subdivision that conforms to the unit lot subdivision standards in Section 23.22.062.

* * *

Section 83. Section 23.84A.038 of the Seattle Municipal Code, last amended by Ordinance 127211, is amended as follows:

23.84A.038 "T"

* * *

"Transit route, frequent" means a transit route or segment of a transit route providing frequent transit service in each direction. Segments of overlapping routes that are co-scheduled and together provide frequent transit service shall be considered to provide frequent transit service, and segments of these routes that do not overlap or do not meet these frequencies will not be considered to provide frequent transit service.

"Transit service, frequent" means transit service with scheduled service in a typical week meeting or exceeding the following scheduled frequencies:

1. On weekdays from 6 a.m. to 7 p.m., 15 minutes on average (i.e., 52 trips between 6 a.m. and 6:59 p.m., inclusive), and no individual hour with fewer than three scheduled trips in each direction;

2. On weekdays from 7 p.m. to 12 a.m., 30 minutes on average (i.e., ten trips between 7 p.m. and 11:59 p.m., inclusive), and no individual hour with fewer than one scheduled trip in each direction; and

3. On weekends from 6 a.m. to 12 a.m., 30 minutes on average (i.e., 36 trips between 6 a.m. and 11:59 p.m., inclusive), and no individual hour with fewer than one scheduled trip in each direction.

4. For the purposes of this definition, "individual hour" means the 60-minute period beginning at the top of each hour; e.g., 6 a.m. to 6:59 a.m., inclusive, or 3 p.m. to 3:59 p.m., inclusive.

“Transit service, major” means the following transit services:

1. Commuter rail;

2. Light rail or street car systems; and

3. Bus rapid transit routes that are in operation or are funded for development and projected for construction within an applicable six-year transit plan under RCW 35.58.2795.

"Transit service area, frequent" means an area within 1,320 feet walking distance of a bus stop served by a frequent transit route or an area within 2,640 feet walking distance of a rail transit station, as shown on a map adopted by Director's Rule.

"Transit service area, major" means an area within 2,640 feet walking distance of a stop served by a major transit service, as shown on a map adopted by Director's Rule.

"Transit station, light rail." See "Rail transit facility" under "Transportation facility."

"Transit station access easement" means an easement for a pedestrian route or connection to provide direct access from street level to transit tunnel stations and concourses and/or light rail transit facilities.

"Transit station access, grade-level" means a pedestrian connection that provides direct access from street level to transit tunnel stations or concourses and/or light rail transit facilities at approximately the same level as the station mezzanine.

"Transit station access, mechanical" means a pedestrian connection that incorporates a mechanical device, such as an escalator, to provide direct access from street level to transit tunnel stations and concourses and/or light rail transit facilities.

"Transit stop, major" means a stop on a major transit service.

* * *

((~~"Triplex" means a single structure containing three dwelling units, none of which is a legally established accessory dwelling unit.~~))

* * *

Section 84. Section 23.84A.040 of the Seattle Municipal Code, last amended by Ordinance 126862, is amended as follows:

23.84A.040 "U"

* * *

"Unit, low-income" means a ((~~dwelling~~)) restricted unit that, for a minimum period of at least 50 years, is ((~~a restricted unit~~)) affordable to and reserved solely for ((~~families~~)) households

with annual incomes not to exceed 60 percent of median income for rental units or 80 percent of median income for ownership units ((~~according to one or more regulatory agreements, covenants, or other legal instruments that, as a condition to issuance of the first building permit that includes the structural frame for the structure that includes the low-income unit, shall be executed and recorded on the title of the property and are enforceable by The City of Seattle, King County, State of Washington, Washington State Housing Finance Commission, or other public agency if approved by the Director of Housing~~)).

"Unit, moderate-income" means a ((~~dwelling~~)) restricted unit that, for a minimum period of at least 50 years, is ((~~a restricted unit~~)) affordable to and reserved solely for ((~~families~~)) households with annual incomes not to exceed 80 percent of median income for rental units or 100 percent of median income for ownership units ((~~according to one or more regulatory agreements, covenants, or other legal instruments that, as a condition to issuance of the first building permit that includes the structural frame for the structure that includes the moderate-income unit, shall be executed and recorded on the title of the property and are enforceable by The City of Seattle, King County, State of Washington, Washington State Housing Finance Commission, or other public agency if approved by the Director of Housing~~)).

"Unit, restricted" means a dwelling unit ((~~on a property~~)) subject to ((~~a recorded agreement with the~~)) one or more regulatory agreements, covenants, or other legal instruments recorded on the title of the property and enforceable by The City of Seattle, King County, State of Washington, Washington State Housing Finance Commission, or other public agency, if approved by the Director of Housing, that for a specified number of years limits ((~~both the unit's rent or sale price, as applicable, and eligible residents' annual income at a specified percentage of median income. For purposes of each restricted unit, eligible residents shall be a "family"~~

~~according to 24 CFR Section 5.403 or successor provision, and the family's "annual income" shall be determined according to 24 CFR Section 5.609 or successor provision, unless otherwise approved in writing by the Director of Housing~~)) housing costs for income-eligible households, specified as a percentage of median income, as follows:

1. For renter-occupied housing, rental housing costs for each restricted unit shall not exceed 30 percent of the income limit; and

2. For owner-occupied housing, the initial sale price of each restricted unit shall be affordable to income-eligible households and resale prices must allow modest growth in homeowner equity while maintaining long-term affordability for subsequent eligible homebuyers, all as determined by the Director of Housing, consistent with Council-adopted Housing Funding Policies if funded by the Office of Housing or subsections 23.58C.050.C.7.a and 23.58C.050.C.7.b if not funded by the Office of Housing.

* * *

Section 85. Section 23.84A.046 of the Seattle Municipal Code, last amended by Ordinance 125603, is amended as follows:

23.84A.046 "Y"

((~~"Yard." See "Yard, front," "Yard, side" and "Yard, rear."~~

~~"Yard, front" means an area from the ground upward between the side lot lines of a lot, extending from the front lot line to a line on the lot parallel to the front lot line, the horizontal depth of which is specified for each zone. The front yard includes all portions of the lot that are within the specified distance from the street along which the front lot line extends, even if separated from the street by an intervening lot. In the case of an irregularly-shaped lot, the front yard shall be a portion of the property as determined according to Section 23.86.010.~~

~~"Yard, rear" means an area from the ground upward between the side lot lines of a lot, extending from the rear lot line to a line on the lot parallel to the rear lot line, the horizontal depth of which is specified for each zone. In the case of an irregularly-shaped lot, the rear yard shall be a portion of the property adjacent to the rear lot line as determined according to subsection 23.86.010.C.~~

~~"Yard, side" means an area from the ground upward between the front yard (or front lot line if no front yard is required); and the rear yard (or rear lot line if no rear yard is required); and extending from a side lot line to a line on the lot, parallel to the side lot line, the horizontal depth of which is specified for each zone.~~))

* * *

Section 86. Section 23.84A.048 of the Seattle Municipal Code, last amended by Ordinance 126685, is amended as follows:

23.84A.048 "Z"

* * *

((~~"Zone, neighborhood residential" means a zone with a classification that includes any of the following: NR1, NR2, NR3, and RSL.~~))

* * *

"Zone, residential" means a zone with a classification that includes any of the following: ((~~NR1, NR2, NR3, RSL~~)) NR, LR1, LR2, LR3, MR, HR, RC, DMR, IDR, SM/R, SM-SLU/R, and SM-U/R which classification also may include one or more suffixes((~~, but not including any zone with an RC designation~~)).

((~~"Zone, single-family" means a zone with a classification that includes any of the following: Neighborhood Residential 1 (NR1), Neighborhood Residential 2 (NR2), Neighborhood Residential 3 (NR3), and Residential Small Lot (RSL).~~))

Section 87. Section 23.86.002 of the Seattle Municipal Code, last amended by Ordinance 125791, is amended as follows:

23.86.002 General provisions

* * *

B. Fractions

1. Unless otherwise indicated, if any measurement technique for determining the number of items required or allowed, including but not limited to motor vehicle parking, or required trees or shrubs, results in fractional requirements, any fraction up to and including 0.5 of the applicable unit of measurement shall be disregarded and fractions over 0.5 shall require the next higher full unit of measurement.

2. If any measurement technique for determining required minimum or allowed maximum dimensions, including but not limited to height, ((~~yards,~~)) setbacks, lot coverage, open space, building depth, parking space size, or curb cut width, results in fractional requirements, the dimension shall be measured to the nearest inch. Any fraction up to and including 0.5 of an inch shall be disregarded and fractions over 0.5 of an inch shall require the next higher unit.

3. ((~~Except within Lowrise and RSL zones, if density calculations result in a fraction of a unit, any fraction up to and including 0.5 constitutes zero additional units, and any fraction over 0.5 constitutes one additional unit. Within Lowrise zones, the effect of a density calculation that results in a fraction of a unit is as described in Section 23.45.512. Within RSL zones, the effect of a density calculation that results in a fraction of a unit is as described in~~

~~Section 23.44.017. This provision may not be applied to density calculations that result in a quotient less than one.~~)) When calculation of the number of dwelling units allowed results in a fraction of a unit, any fraction shall be rounded down.

* * *

Section 88. Section 23.86.006 of the Seattle Municipal Code, last amended by Ordinance 126685, is amended as follows:

23.86.006 Structure height measurement

* * *

B. Within the South Lake Union Urban Center, at the applicant's option, structure height shall be measured either as provided for in subsection 23.86.006.A((~~, 23.86.006.E~~)) or 23.86.006.D, or under provisions of this subsection 23.86.006.B. Structure height shall be measured for all portions of the structure. All measurements shall be taken vertically from existing or finished grade, whichever is lower, to the highest point of the structure located directly above each point of measurement. Existing or finished grade shall be established by drawing straight lines between the corresponding elevations at the perimeter of the structure. The straight lines will be existing or finished grade for the purpose of height measurement. When a contour line crosses a facade more than once, that contour line will be disregarded when establishing existing or finished grade.

C. ((~~Height averaging for neighborhood residential zones. In a neighborhood residential zone, when expanding an existing structure occupied by a nonconforming residential use per Section 23.42.106, the following measurement shall be used to determine the average height of the closest principal structures on either side:~~

~~1. Each structure used for averaging shall be on the same block front as the lot for which a height limit is being established. The structures used shall be the nearest single-family structure on each side of the lot, and shall be within 100 feet of the side lot lines of the lot.~~

~~2. The height limit for the lot shall be established by averaging the elevations of the structures on either side in the following manner:~~

~~a. If the nearest structure on either side has a roof with at least a 4:12 pitch, the elevation to be used for averaging shall be the highest point of that structure's roof minus 5 feet.~~

~~b. If the nearest structure on either side has a flat roof, or a roof with a pitch of less than 4:12, the elevation of the highest point of the structure's roof shall be used for averaging.~~

~~c. Rooftop features which are otherwise exempt from height limitations according to subsection 23.44.012.C, shall not be included in elevation calculations.~~

~~d. The two elevations obtained from subsection 23.86.006.B.2.a and/or subsection 23.86.006.B.2.b shall be averaged to derive the height limit for the lot. This height limit shall be the difference in elevation between the midpoint of a line parallel to the front lot line at the required front setback and the average elevation derived from subsection 23.86.006.B.2.a and/or subsection 23.86.006.B.2.b.~~

~~e. The height measurement technique used for the lot shall then be the City's standard measurement technique, subsection 23.86.006.A.~~

~~3. If there is no single-family structure within 100 feet of a side lot line, or if the nearest single-family structure within 100 feet of a side lot line is not on the same block front,~~

~~the elevation used for averaging on that side shall be 30 feet plus the elevation of the midpoint of the front lot line of the abutting vacant lot.~~

~~4. If the lot is a corner lot, the height limit may be the highest elevation of the nearest structure on the same block front, provided that the structure is within 100 feet of the side lot line of the lot and that both front yards face the same street.~~

~~5. In no case shall the height limit established according to these height averaging provisions be greater than 40 feet.~~

~~6. Lots using height averaging to establish a height limit shall be eligible for the pitched roof provisions of subsection 23.44.012.B.~~

~~D.~~)) Stories or portions of stories of a structure that are underground are not analyzed for purposes of structure height measurement.

((~~E.~~)) D. Height measurement techniques in downtown zones and in the South Lake Union Urban Center

1. Determine the major street lot line, which shall be the lot's longest street lot line. When the lot has two or more street lot lines of equal length, the applicant shall choose the major street lot line.

2. Determine the slope of the lot along the entire length of the major street lot line.

3. ((~~The~~)) Measure the maximum height ((~~shall be measured~~)) as follows:

a. When the slope of the major street lot line is less than or equal to 7.5 percent, the elevation of maximum height shall be determined by adding the maximum permitted height to the existing grade elevation at the midpoint of the major street lot line. On a through-lot, the elevation of maximum height shall apply only to the half of the lot nearest

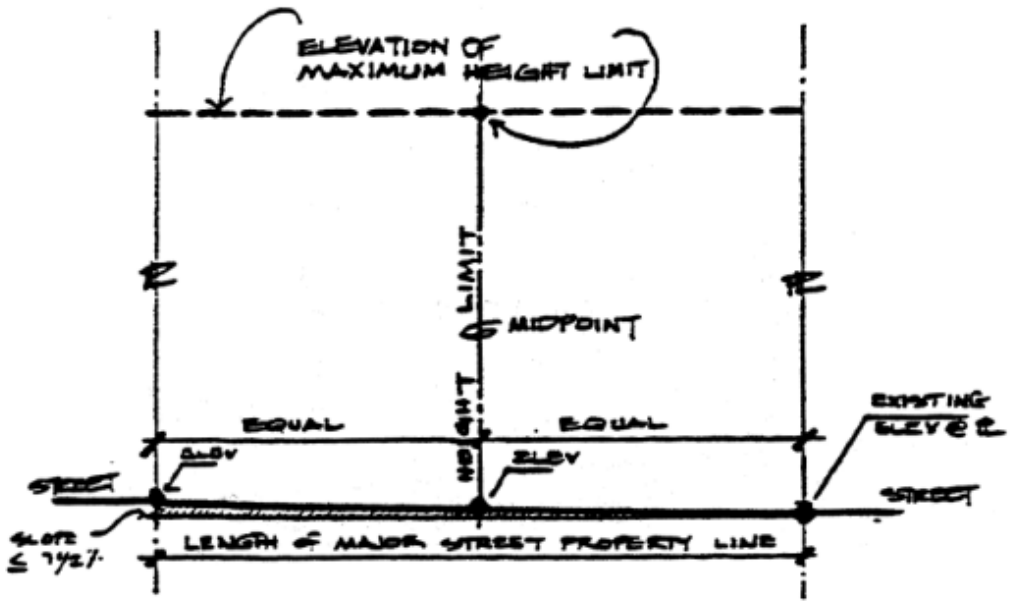
the major street lot line. On the other half of a through-lot, the elevation of maximum height shall be determined by the above method using the street lot line opposite and parallel to the major street lot line as depicted in Exhibit ((~~B~~)) A for 23.86.006.

Exhibit A for 23.86.006

Maximum height

Slope Less than or equal to 7-1/2 percent

Exhibit A for 23.86.006
Maximum height
Slope less than or equal to 7-1/2 percent



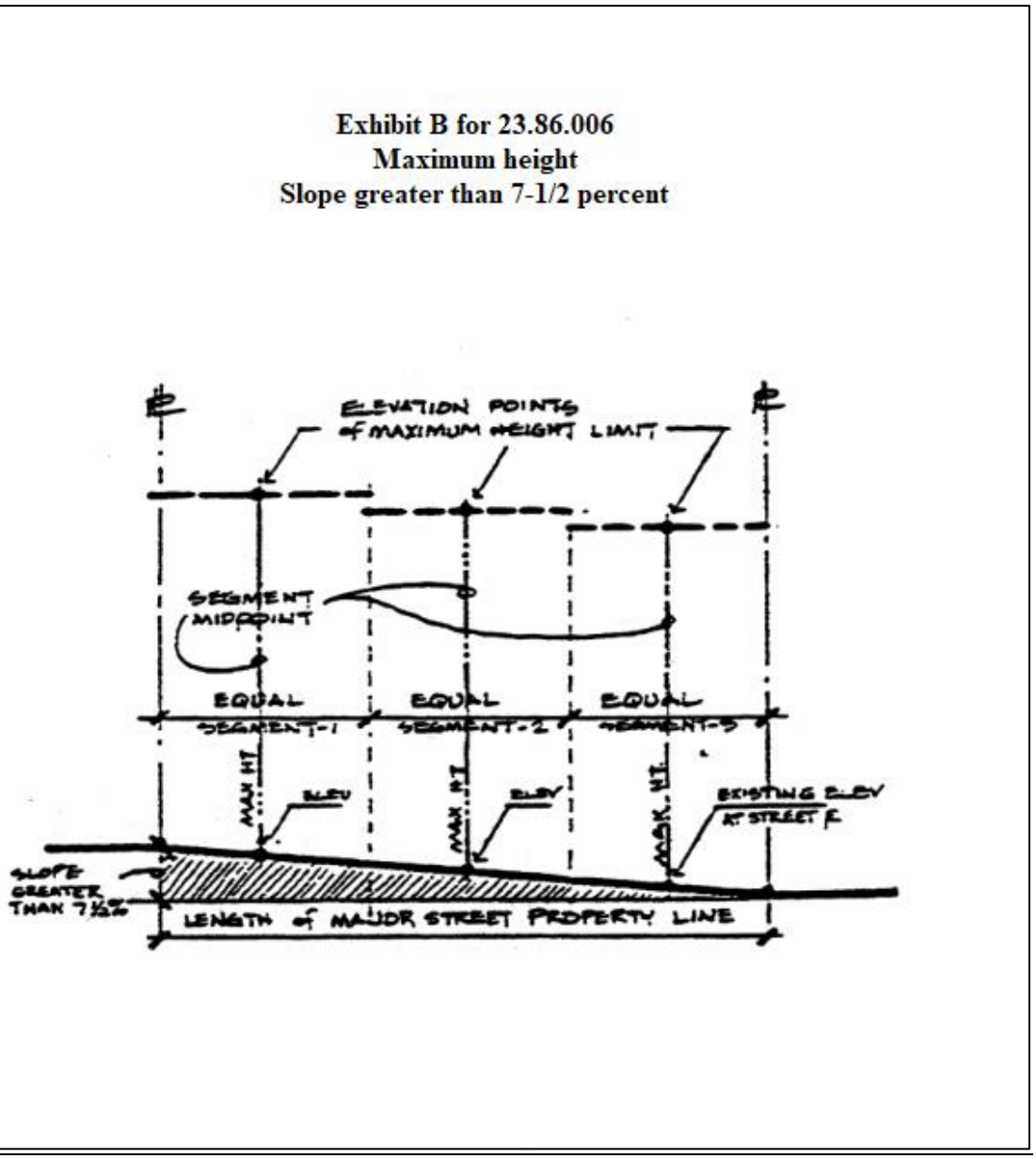
b. When the slope of the major street lot line exceeds 7.5 percent, the major street lot line shall be divided into four or fewer equal segments no longer than 120 feet

in length. The elevation of maximum height shall be determined by adding the maximum permitted height to the existing grade elevation at the midpoint of each segment. On a through-lot, the elevation of maximum height shall apply only to the half of the lot nearest the major street lot line. On the other half of a through-lot, the elevation of maximum height shall be determined by the above method using the street lot line opposite and parallel to the major street lot line, as depicted in Exhibit ((~~C~~)) B for 23.86.006.

Exhibit B for 23.86.006

Maximum height

Slope greater than 7-1/2 percent



c. For lots with more than one street frontage, where there is no street lot line that is essentially parallel to the major street lot line, when a measurement has been made for the portion of the block containing the major street lot line, the next measurement shall be

taken from the remaining street lot line that is opposite and most distant from the major street lot line.

((~~F.~~)) E. Determining the height of existing public school structures. When the height of the existing public school structure is measured for purposes of determining the permitted height or lot coverage of a public school structure, either of the following measurement methods may be used:

1. If all parts of the new roof are pitched at a rate of not less than 4:12, the ridge of the new roof may extend to the highest point of the existing roof. A shed roof does not qualify for this option; or

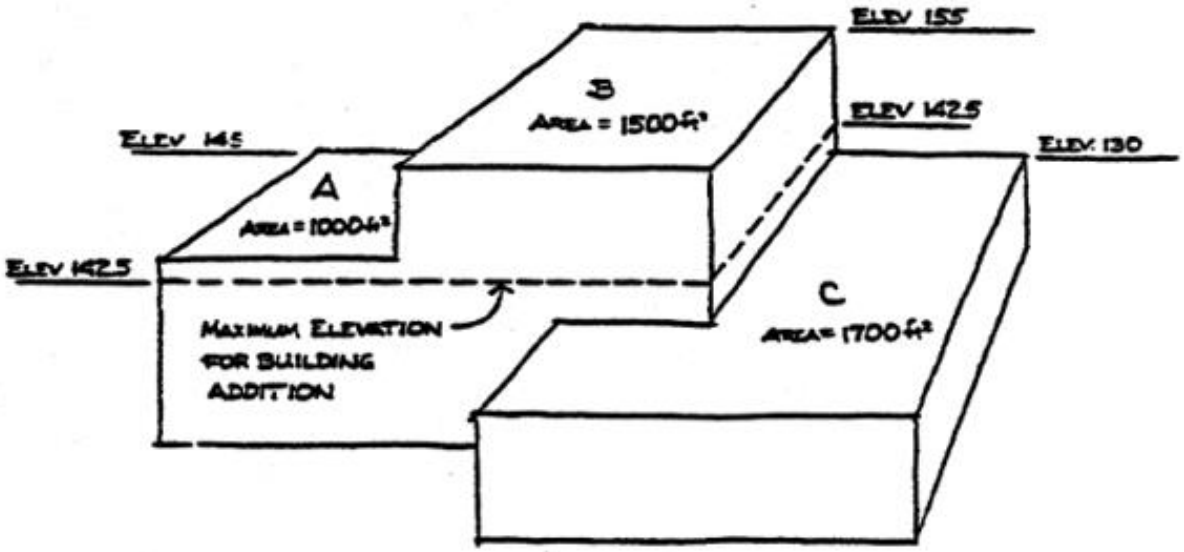
2. If all parts of the new roof are not pitched at a rate of not less than 4:12, then the elevation of the new construction may extend to the average height of the existing structure. The average height shall be determined by measuring the area of each portion of the building at each height and averaging those areas, as depicted in Exhibit ((~~D~~)) C for 23.86.006.

Exhibit C for 23.86.006

Maximum elevations for additions to public schools

Exhibit C for 23.86.006

Maximum elevations for additions to public schools



ROOF LEVEL	AREA	×	ELEV.	=	PRODUCT
A	1000	×	145	=	145,000
B	1500	×	155	=	232,500
C	1700	×	130	=	221,000
	4200				598,500

$$\text{PERMITTED ROOF ELEVATION FOR BUILDING ADDITION} = \frac{\text{TOTAL PRODUCT}}{\text{TOTAL AREA}} = \text{MAXIMUM ELEVATION}$$

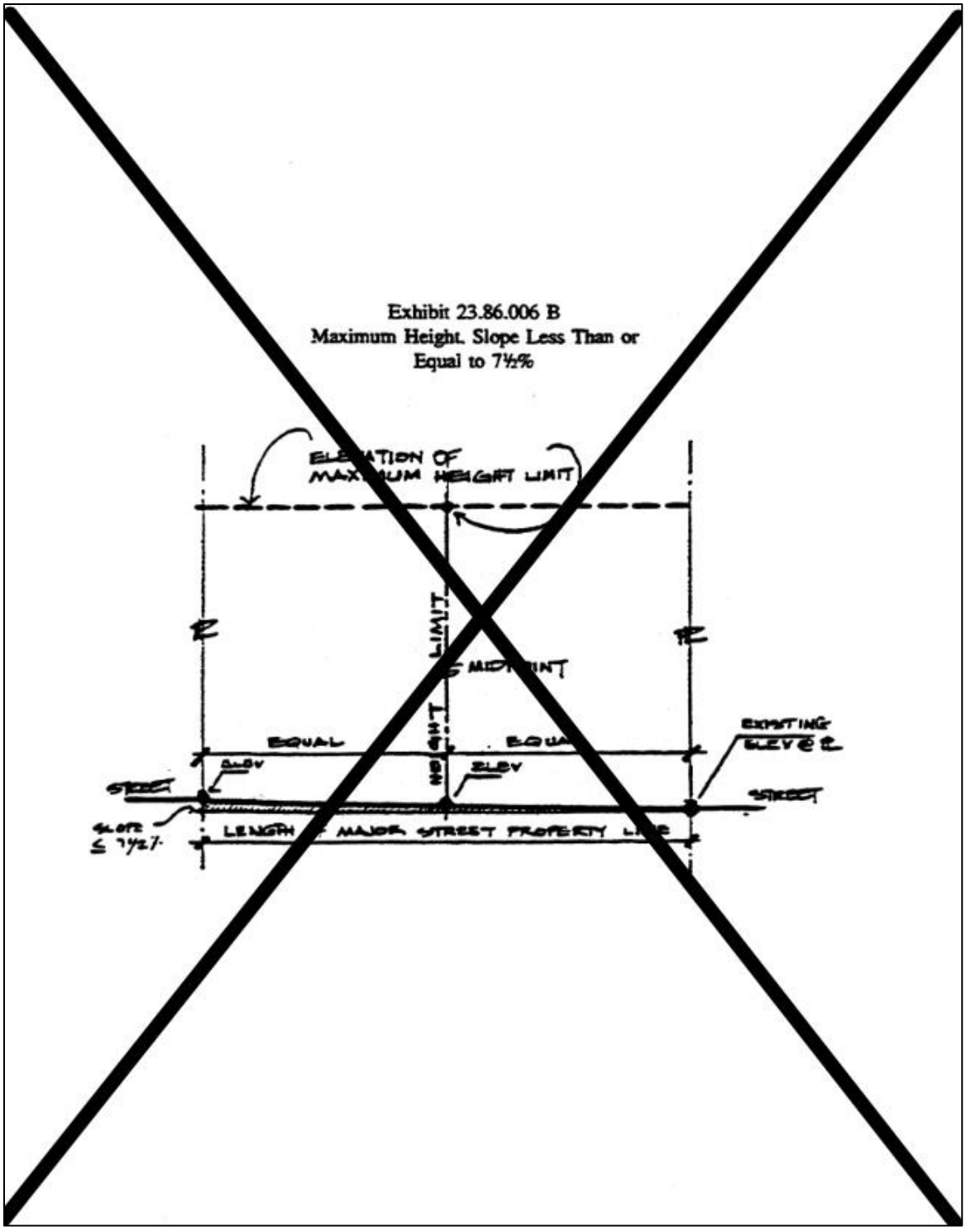
$$= \frac{598{,}500}{4{,}200} = 142.5$$

((~~C.~~)) F. Height measurement technique for structures located partially within the Shoreline District. When any portion of the structure falls within the Shoreline District,

structure height for the entire structure shall be measured according to Section 23.60A.952((~~,~~ ~~Height~~)).

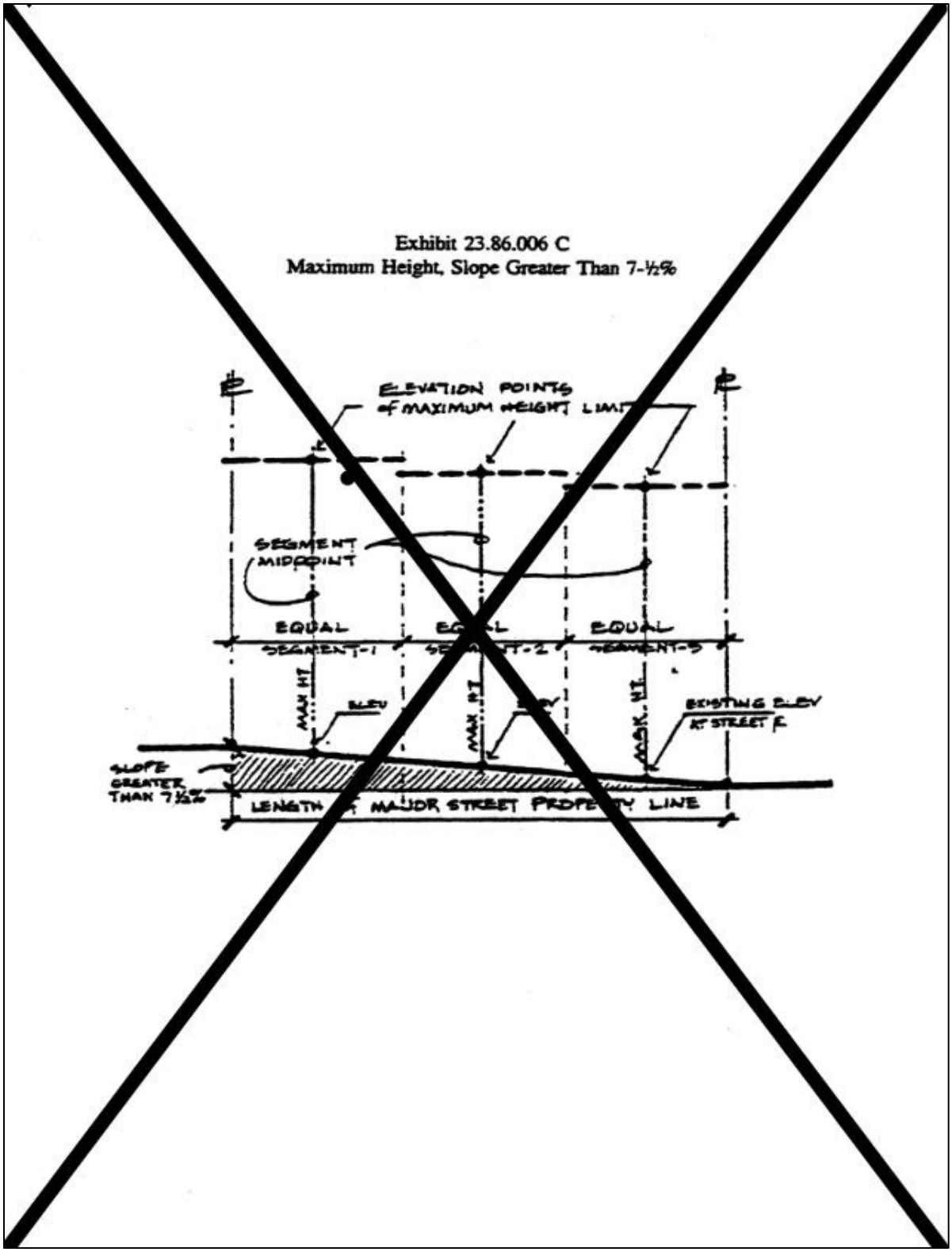
((~~H.~~)) G. For projects accepted into the Living Building Pilot Program authorized pursuant to Section 23.40.060, the applicant may choose either the height definition of Chapter 2 of the Seattle Building Code or the height measurement method described in this Section 23.86.006.

Exhibit 23.86.006 B
Maximum Height. Slope Less Than or Equal to 7½%



1

Exhibit 23.86.006 C
Maximum Height, Slope Greater Than 7-½%



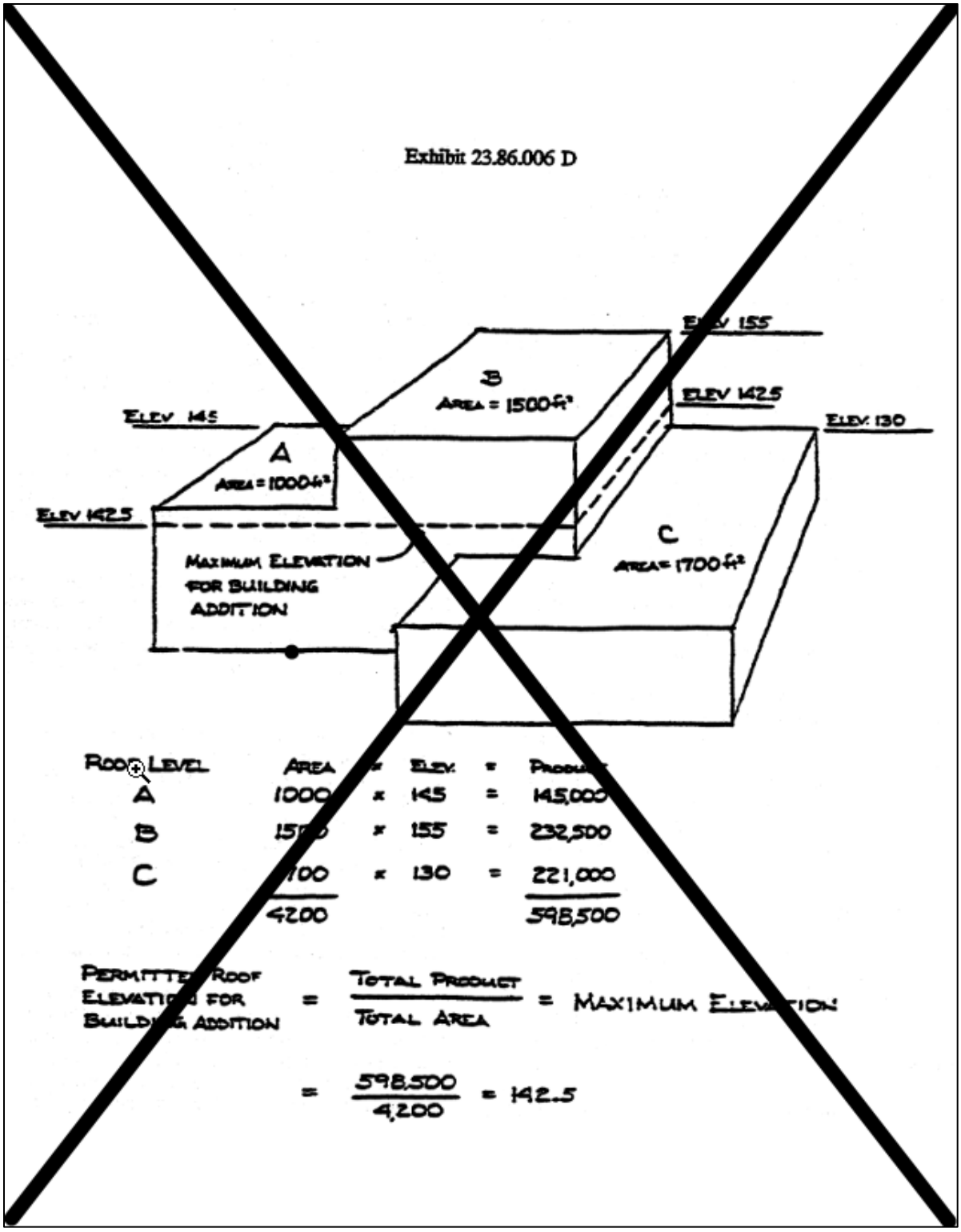


Exhibit 23.86.006 D
ELEV 155
B
AREA = 1500ft²
ELEV 142.5
ELEV 145
ELEV 130
A
AREA = 1000ft²
ELEV 142.5
C
AREA = 1700ft²
MAXIMUM ELEVATION FOR BUILDING ADDITION
ROOF LEVEL AREA × ELEV. = PRODUCT
A 1000 × 145 = 145,000
B 1500 × 155 = 232,500
C 1700 × 130 = 221,000
4200 598,500
PERMITTED ROOF ELEVATION FOR BUILDING ADDITION = TOTAL PRODUCT / TOTAL AREA = MAXIMUM ELEVATION
= 598,500 / 4,200 = 142.5

1

Section 89. Section 23.86.007 of the Seattle Municipal Code, last amended by Ordinance 126855, is amended as follows:

23.86.007 Floor area and floor area ratio (FAR) measurement

A. Gross floor area. Except where otherwise expressly provided in this Title 23, gross floor area shall be as defined in Chapter 23.84A and as measured in this Section 23.86.007. The following are included in the measurement of gross floor area in all zones:

1. Floor area contained in stories above and below grade;

2. The area of stair penthouses, elevator penthouses, and other enclosed rooftop features;

3. The area of motor vehicle and bicycle parking that is enclosed; and

4. The area of motor vehicle parking that is covered by a structure or portion of a structure containing enclosed floor area, excluding motor vehicle parking in ((~~neighborhood residential~~)) Neighborhood Residential and multifamily zones that is only covered by one of the following:

a. Projections containing enclosed floor area of up to 4 feet; or

b. Projections containing enclosed floor area of up to 6 feet for the area of parking accessed from an alley and located directly adjacent to an alley.

* * *

D. Pursuant to subsections ((~~23.44.011.C, 23.44.018.A,~~)) 23.44.050.C, 23.45.510.D, and 23.47A.013.B, and Section 23.48.020, for certain structures in ((~~neighborhood residential~~)) Neighborhood Residential, multifamily, commercial, and Seattle Mixed zones, portions of a story that extend no more than 4 feet above existing or finished grade, whichever is lower, are exempt from calculation of gross floor area. The exempt gross floor area of such partially below-grade stories is measured as follows:

1. Determine the elevation 4 feet below the ceiling of the partially below-grade story, or 4 feet below the roof surface if there is no next floor above the partially below-grade story;

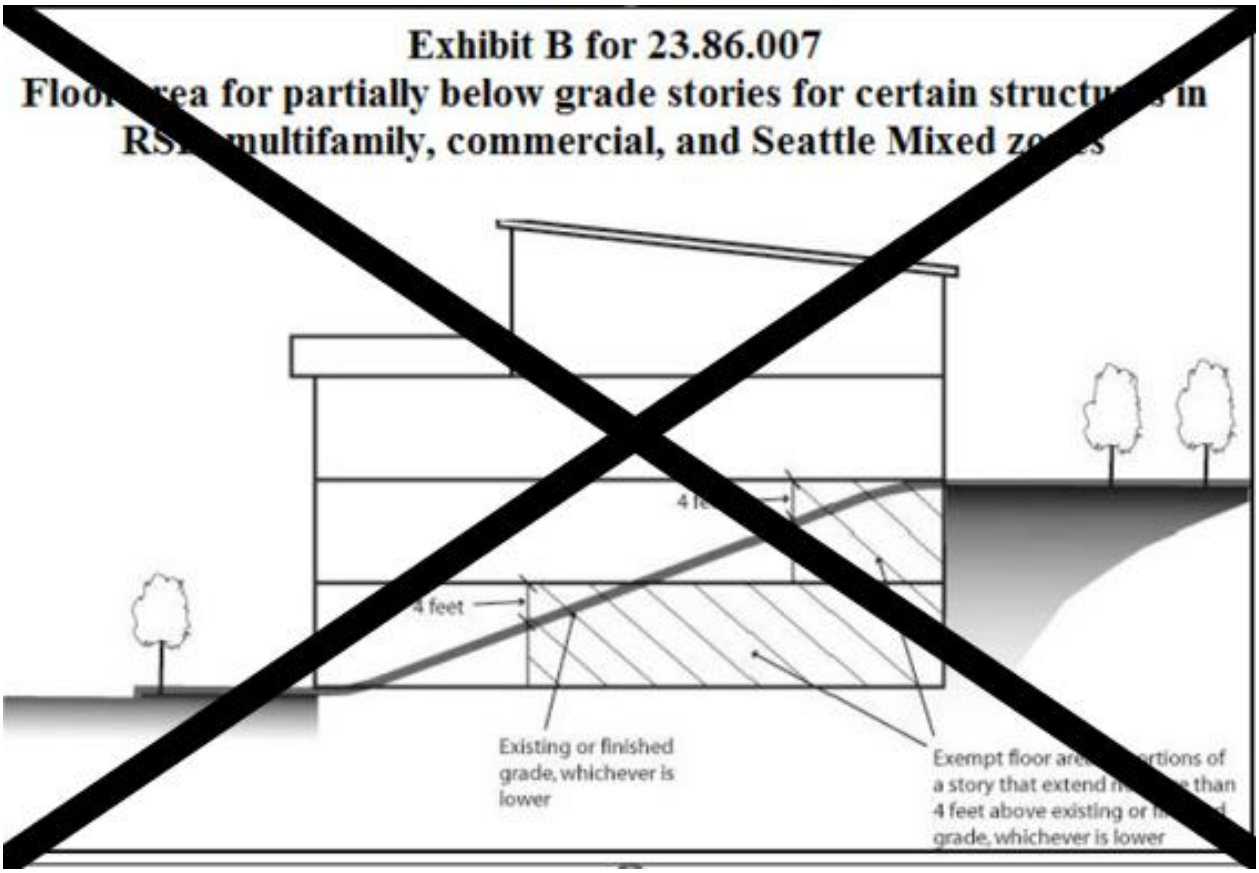
2. Determine the points along the exterior wall of the story where the elevation determined in subsection 23.86.007.D.1 intersects the abutting corresponding existing or finished grade elevation, whichever is lower;

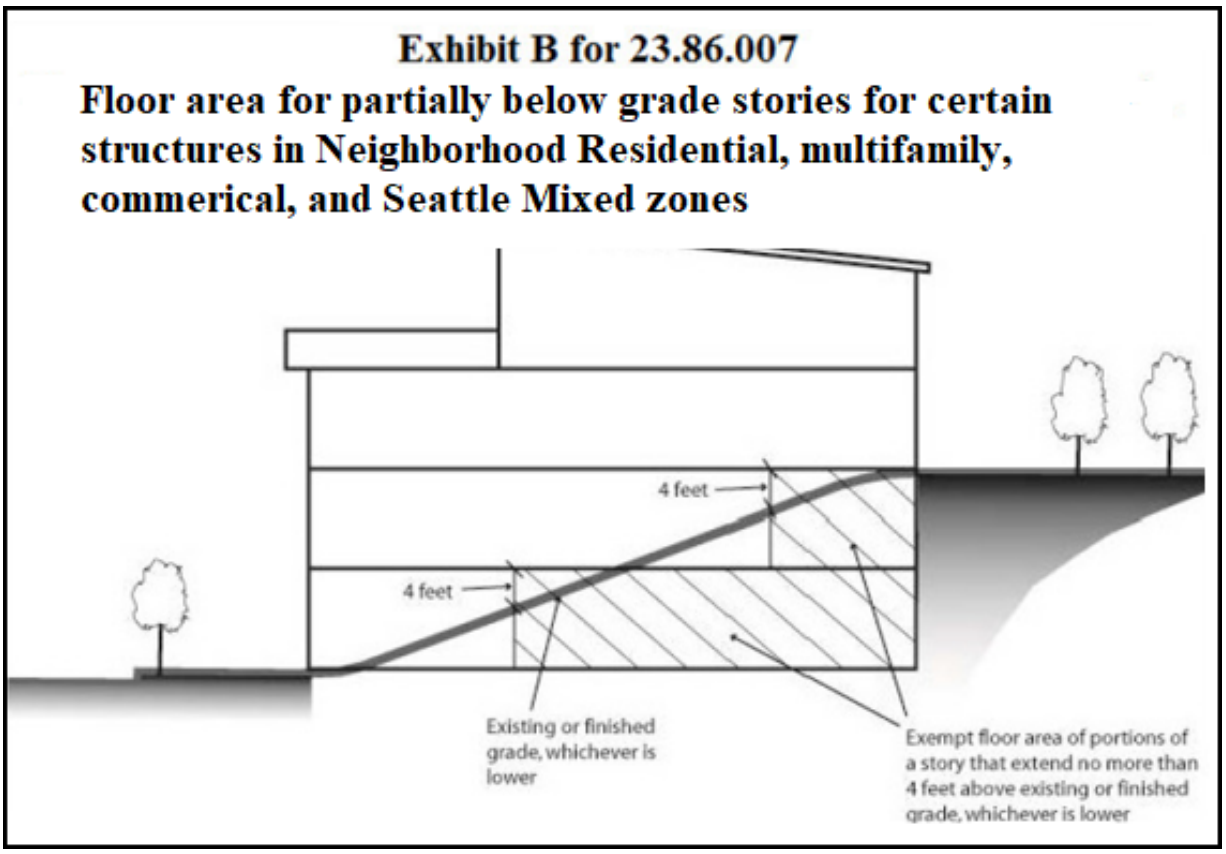
3. Draw a straight line across the story connecting the two points on the exterior walls; and

4. The gross floor area of the partially below-grade story or portion of a partially below-grade story is the area of the story that is at or below the straight line drawn in subsection 23.86.007.D.3, excluding openings required by the Building Code for egress. (See Exhibit B for 23.86.007.)

Exhibit B for 23.86.007

Floor area for partially below grade stories for certain structures in ((~~RSL~~)) <u>Neighborhood Residential</u>, multifamily, commercial, and Seattle Mixed zones





* * *

Section 90. Section 23.86.008 of the Seattle Municipal Code, last amended by Ordinance 126509, is amended as follows:

23.86.008 Lot ((~~coverage,~~)) width ((~~and depth.~~)) <u>in Neighborhood Residential zones</u>

((~~A. Lot coverage shall be calculated in accordance with Exhibit 23.86.008 A.~~

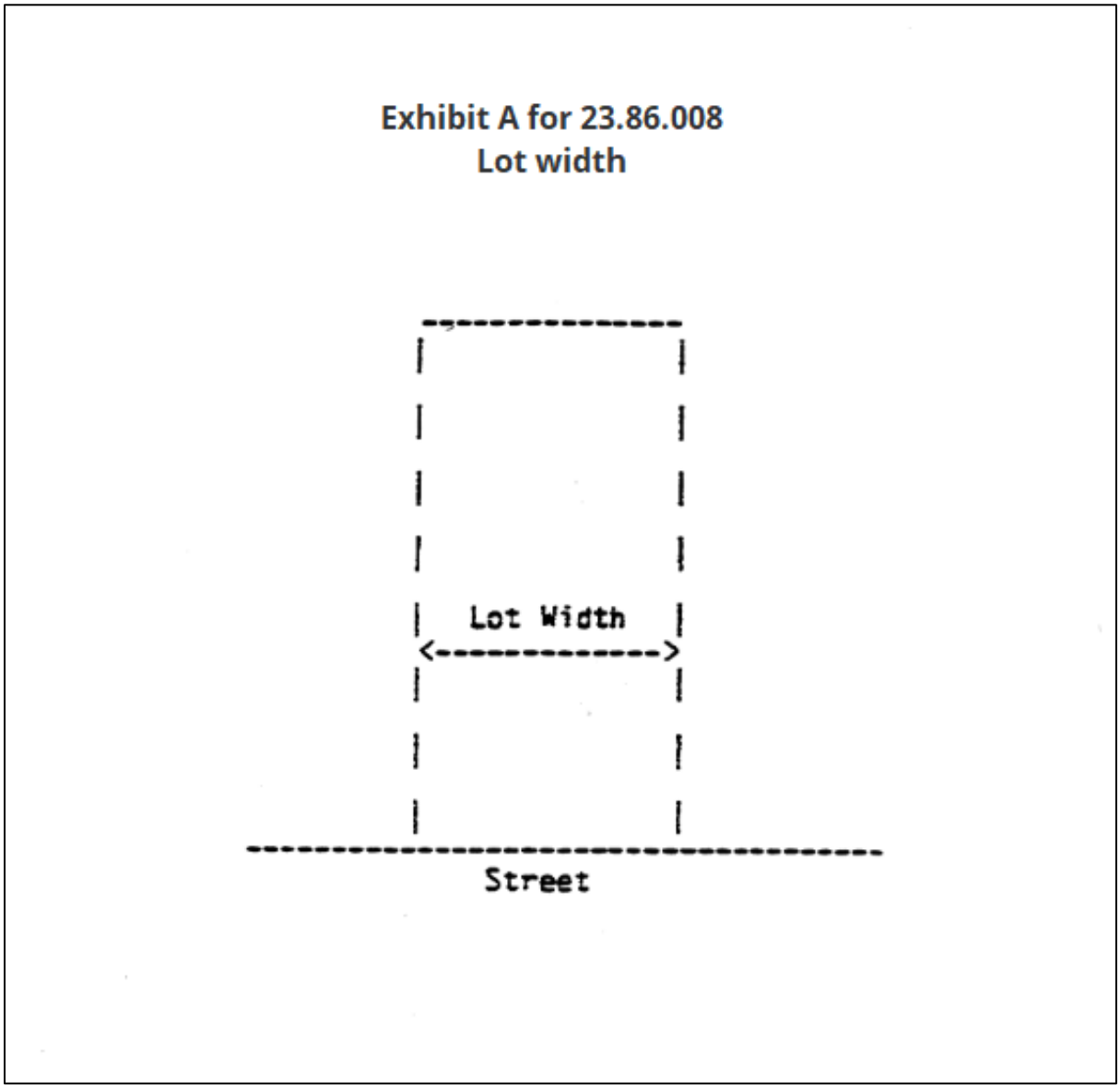
~~B. In neighborhood residential zones, lot depth shall be the length of the line extending between the front lot line or front lot line extended, and the rear lot line or lines, or in the case of a through lot, between the two (2) front lot lines or lines extended. This line shall be perpendicular to the front lot line or front lot line extended. Where an alley abuts the rear of the property, one-half (½) of the width of the alley shall be included as a portion of the lot for determining lot depth.~~

~~C. Lot Width in Neighborhood Residential Zones:~~

~~1.~~)) A. When a lot is essentially rectangular, the lot width ((~~shall be~~)) is the mean horizontal distance between side lot lines measured at right angles to lot depth ((~~(Exhibit 23.86.008 B)~~)) Exhibit A for 23.86.008.

Exhibit A for 23.86.008

Lot width



((~~2. In the case of~~)) B. For a lot with more than one (((~~(1)~~))) rear lot line (((~~(Exhibits 23.86.008 C and 23.86.008 D)~~))) (Exhibit B for 23.86.008 and Exhibit C for 23.86.008), the lot width shall be measured according to the following:

Exhibit B for 23.86.008

Lots with more than one rear lot line, and where the distance between the rear lot line is less than 50 percent of lot depth

Exhibit B for 23.86.008
Lots with more than one rear lot line, and where the distance between the rear lot line is less than 50 percent of lot depth

Where A + B is less than 50% of D, the lot width shall be W.

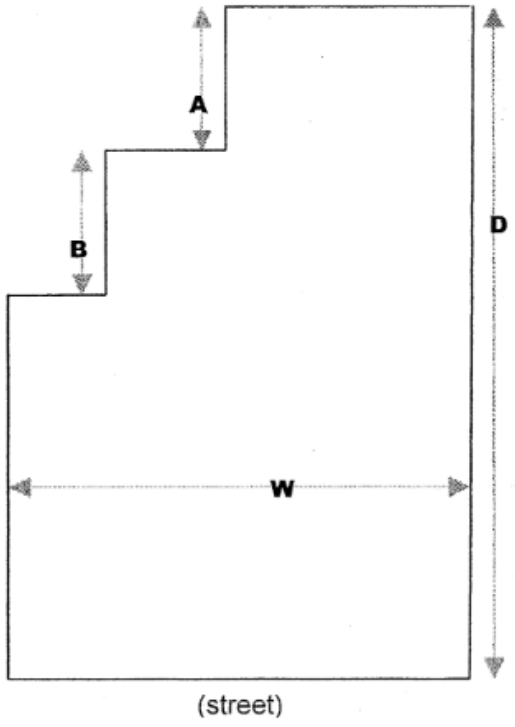
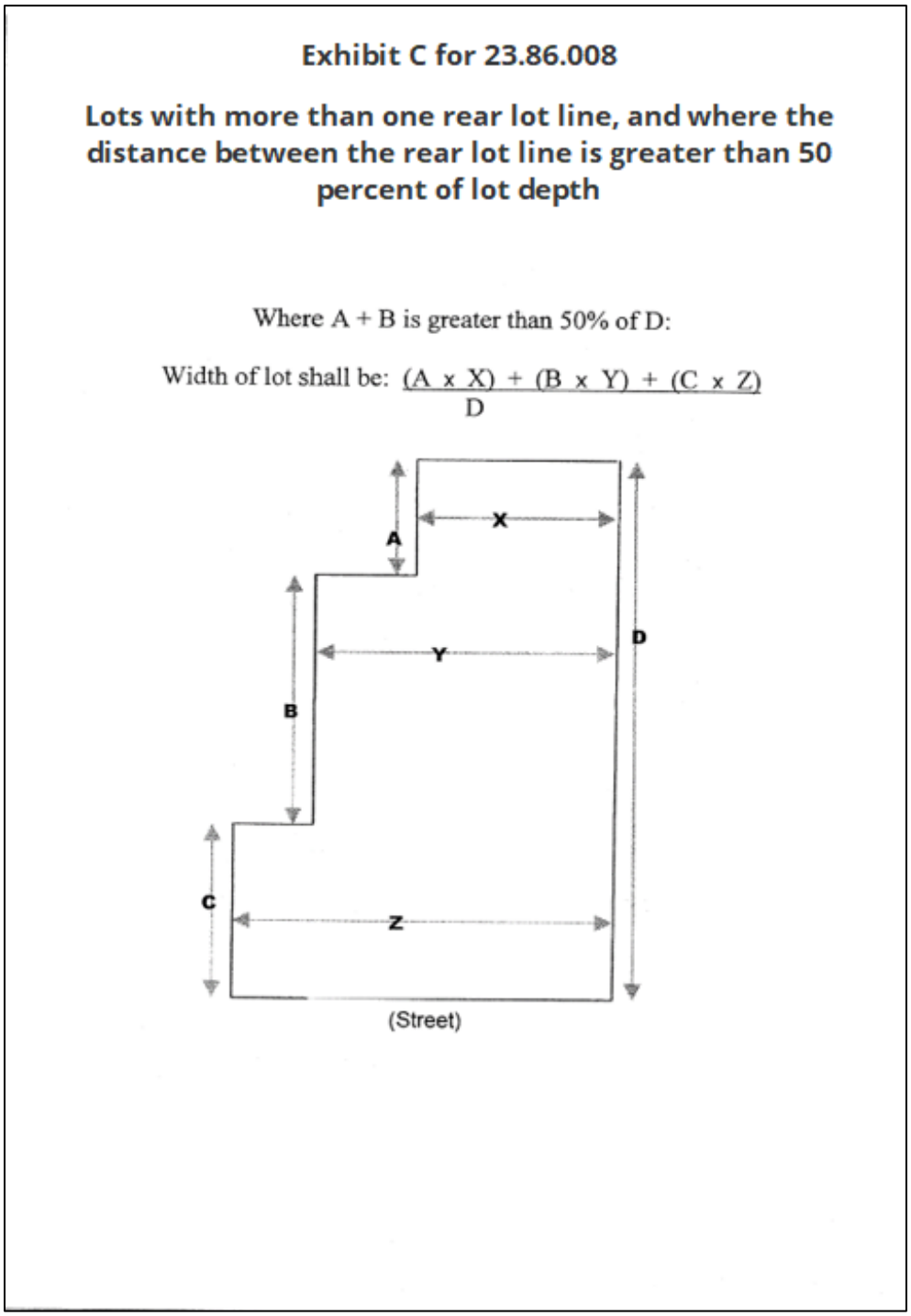


Exhibit C for 23.86.008

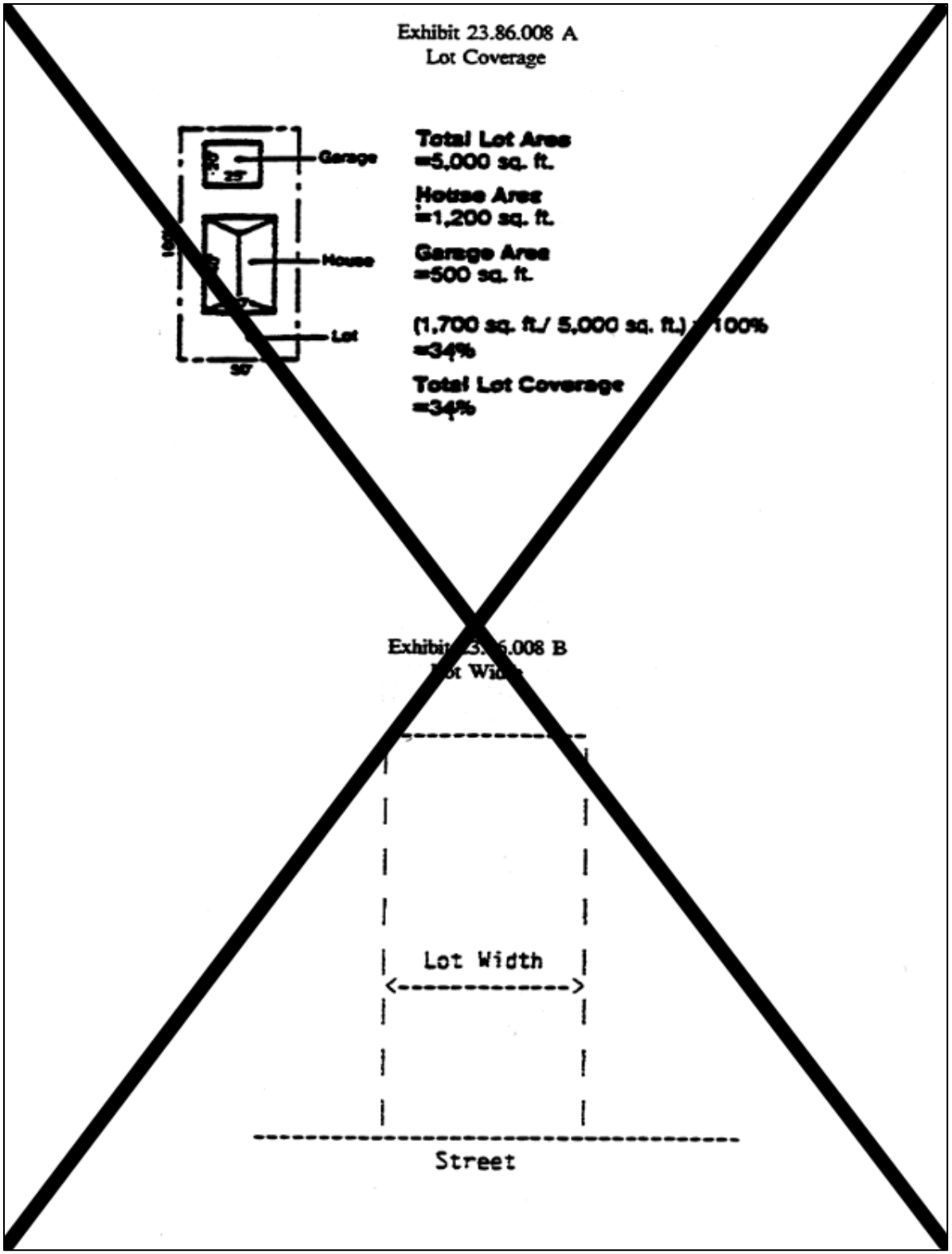
Lots with more than one rear lot line, and where the distance between the rear lot line is greater than 50 percent of lot depth



((~~a.~~)) 1. If the distance between the rear lot lines is ((~~fifty (~~)) 50 ((~~)~~)) percent or less of the lot depth, the lot width shall be measured parallel to the front lot line and shall be the greatest distance between the side lot lines (((~~Exhibit 23.86.008 C~~))) Exhibit B for 23.86.008; or

((~~b.~~)) 2. If the distance between the rear lot lines is greater than ((~~fifty (~~)) 50 ((~~)~~)) percent of the lot depth, the lot width shall be determined by measuring average lot width according to ((~~Exhibit 23.86.008 D~~)) Exhibit C for 23.86.008.

((~~3.~~)) C. For irregular lots not meeting the conditions of subsections ((~~C1 or C2~~)) 23.86.008.A or 23.86.008.B, the Director shall determine the measurement of lot width.



((~~Exhibits 23.86.008A, 23.86.008B~~))

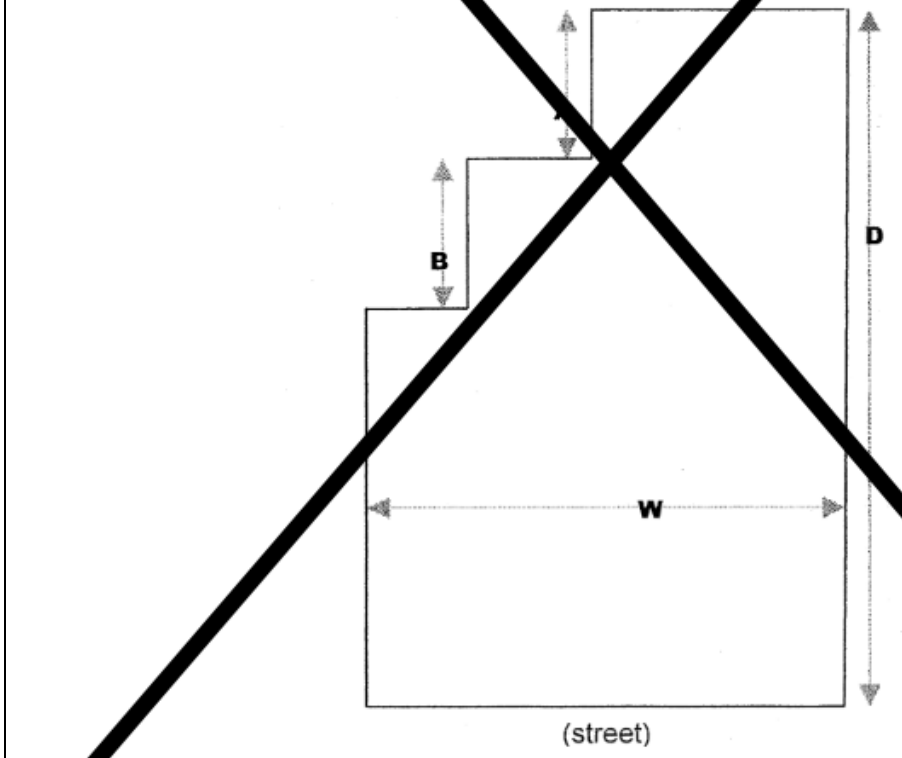
Exhibit 23.86.008 C

Lots With More Than One Rear Lot Line,

And Where The Distance Between The Rear

Lot Line Is Less Than 50% Of Lot Depth

Where A + B is less than 50% of D, the lot width shall be W.



((~~Exhibit 23.86.008C~~))

Exhibit 23.86.008 D

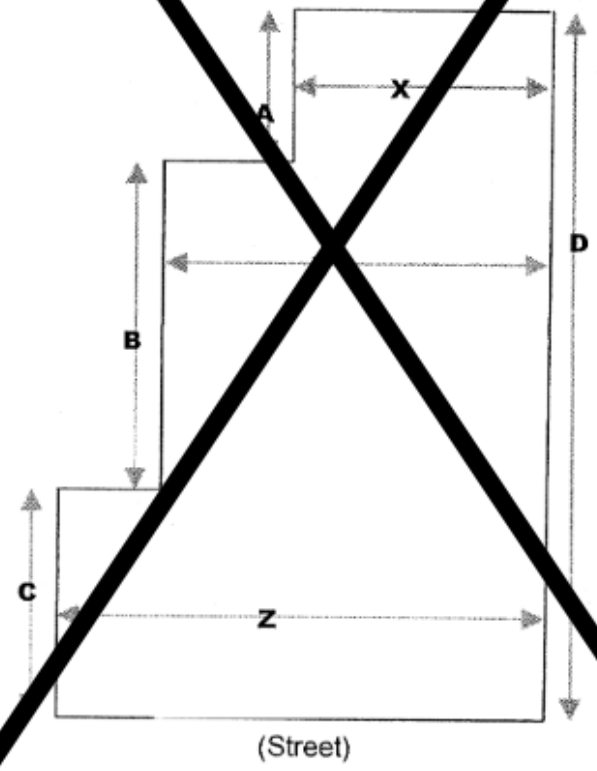
Lots with More Than One Rear Lot Line, And Where

The Distance Between the Rear Lot Line

Is Greater than 50% Of Lot Depth

Where A + B is greater than 50% of D

Width of lot shall be: $\frac{(A \times X) + (B \times Y) + (C \times Z)}{D}$



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Section 91. Section 23.86.010 of the Seattle Municipal Code, last amended by Ordinance 126509, is repealed:

((~~23.86.010 Yards~~

~~A. Measuring required yards. Required yard dimensions shall be horizontal distances, measured perpendicular to the appropriate lot lines (Exhibit A for 23.86.010). For lots with no street frontage, the applicant may designate the front lot line, provided that under the resulting orientation, the area of the front yard is at least 20 percent of the area of the lot or 1,000 square feet whichever is less. If a lot with frontage on more than one street is developed with an existing principal structure, the orientation of the lot for the purpose of current yard requirements shall be the orientation under which the existing structure is most conforming to current yard standards.~~

~~B. Front Yards.~~

~~1. Determining Front Yard Requirements. Front yard requirements are presented in the development standards for each zone. Where the minimum required front yard is to be determined by averaging the setbacks of structures on either side of a lot, the following provisions apply:~~

~~a. The required depth of the front yard shall be the average of the distance between single-family structures and front lot lines of the nearest single-family structures on each side of the lot (Exhibit B for 23.86.010). If the front facade of the single-family structure is not parallel to the front lot line, the shortest distance from the front lot line to the structure shall be used for averaging purposes (Exhibit C for 23.86.010).~~

~~b. The yards used for front yard averaging shall be on the same block front as the lot, and shall be the front yards of the nearest single-family structures within 100 feet of the side lot lines of the lot.~~

~~c. For averaging purposes, front yard depth shall be measured from the front lot lines to the wall nearest to the street or, where there is no wall, the plane between supports, which comprises 20 percent or more of the width of the front facade of the single-family structure. Enclosed porches shall be considered part of the single-family structure for measurement purposes. Attached garages or carports permitted in front yards under 23.44.016.D, decks, uncovered porches, eaves, attached solar collectors, and other similar parts of the structure shall not be considered part of the structure for measurement purposes.~~

~~d. If there is a dedication of street right-of-way to bring the street abutting the lot closer to the minimum widths established in Section 23.53.015, for averaging purposes the amount of the dedication shall be subtracted from the front yard depth of the structures on either side.~~

~~e. If the first single-family structure within 100 feet of a side lot line of the lot is not on the same block front, or does not provide its front yard on the same street, or if there is no single-family structure within 100 feet of the side lot line, the yard depth used for averaging purposes on that side shall be 20 feet (Exhibits D and E for 23.86.010).~~

~~f. If the front yard of the first single-family structure within 100 feet of the side lot line of the lot exceeds 20 feet, the yard depth used for averaging purposes on that side shall be 20 feet (Exhibit F for 23.86.010).~~

~~g. In cases where the street is very steep or winding, the Director shall determine which adjacent single-family structures should be used for averaging purposes.~~

~~2. Sloped Lots in Neighborhood Residential Zones. For a lot in a neighborhood residential zone, reduction of the required front yard is permitted at a rate of 1 foot for every percent of slope in excess of 35 percent. For the purpose of this provision the slope shall be measured along the centerline of the lot. In the case of irregularly shaped lots, the Director shall determine the line along which slope is calculated.~~

~~C. Rear yards. Rear yard requirements are presented in the standard development requirements for each zone. In determining how to apply these requirements, the following provisions shall apply:~~

~~1. The rear yard shall be measured horizontally from the rear lot line if the lot has a rear lot line that is essentially parallel to the front lot line for its entire length.~~

~~2. If the front lot line is essentially parallel to portions of the rear property line, as with a stepped rear property line, each portion of the rear property line that is opposite and essentially parallel to the front lot line is considered to be a rear lot line for the purpose of establishing a rear yard.~~

~~3. On a lot with a rear property line, part of which is not essentially parallel to any part of the front lot line, the rear yard is measured from a line or lines drawn from side lot line(s) to side lot line(s), at least 10 feet in length, parallel to and at a maximum distance from the front lot line. If an alley abuts the rear of the property, 1/2 the width of the alley, between the side lot lines extended, is considered to be part of the lot for drawing this line. For those portions of the rear lot line that are essentially parallel to the front lot line, subsection 23.86.010.C.2 above shall apply. The lot depth is then measured perpendicularly from this 10 foot long line extended as needed to the point on the actual front lot line that is the furthest~~

~~distance away. This establishes lot depth, which then may be used to determine the required rear yard depth.~~

~~4. For a lot with a curved front lot line, the rear yard is measured from a line at least 10 feet in length, parallel to and at a maximum distance from a line drawn between the endpoints of the curve. The lot depth is then measured perpendicularly from this 10 foot long line extended as needed to the point on the actual front lot line that is the furthest distance away. This establishes lot depth, which then may be used to determine the required rear yard depth.~~

~~5. For a lot with an irregular shape or with an irregular front lot line not meeting conditions of subsections 23.86.010.C.1 through 23.86.010.C.4, the Director shall determine the measurement of the rear yard.~~

~~D. Side Yards.~~

~~1. Side Yard Averaging. Side yard requirements are presented in the standard development requirements for each zone. In certain cases where specifically permitted, the side yard requirement may be satisfied by averaging the distance from side lot line to structure facade for the length of the structure. In those cases the side yard shall be measured horizontally from side lot line to the side facade of the structure.~~))

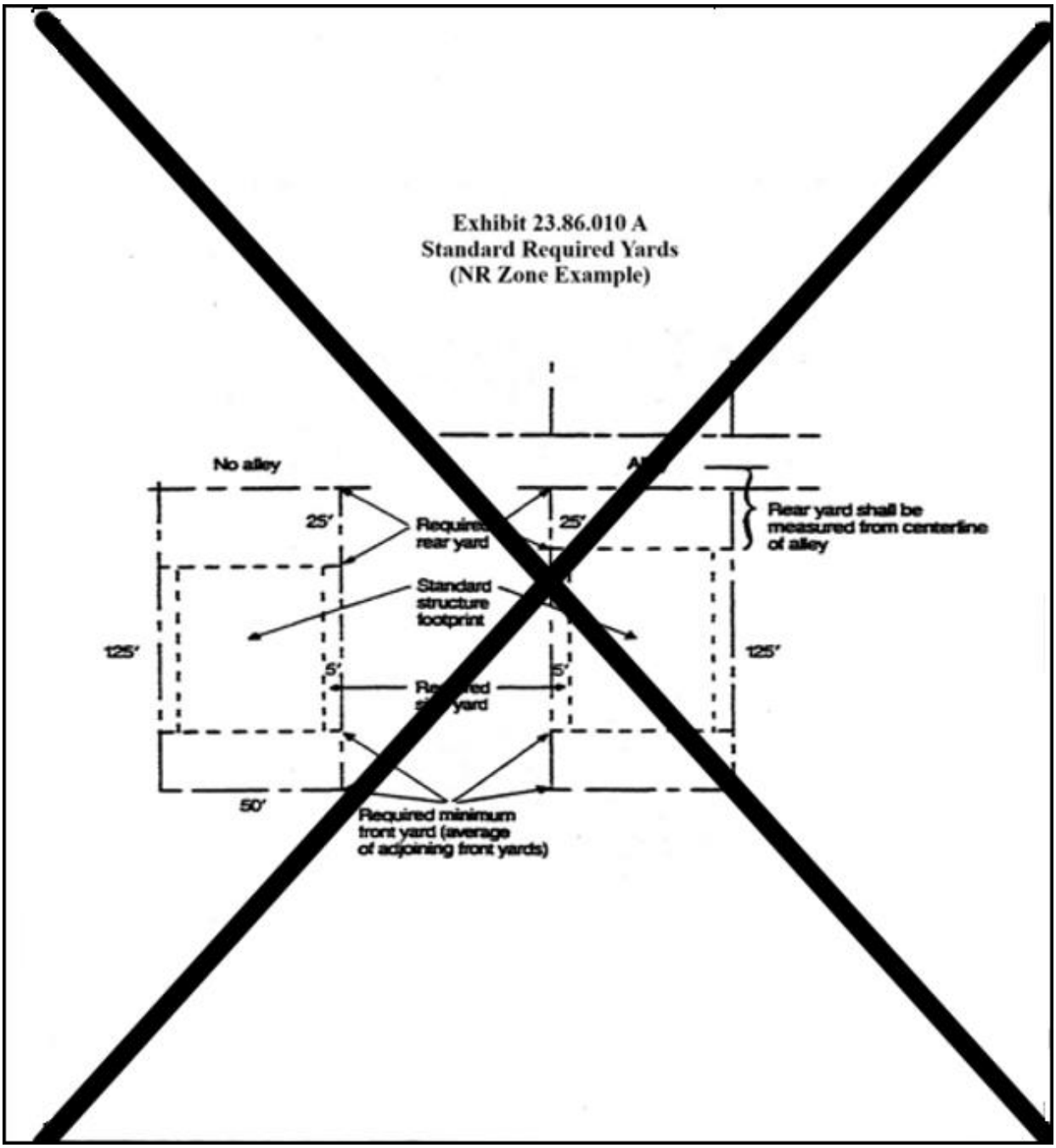


Exhibit 23.86.010 A
Standard Required Yards
(NR Zone Example)
No alley
25'
Required rear yard
25'
Rear yard shall be measured from centerline of alley
Standard structure footprint
125'
125'
5'
5'
50'
Required minimum front yard (average of adjoining front yards)

1

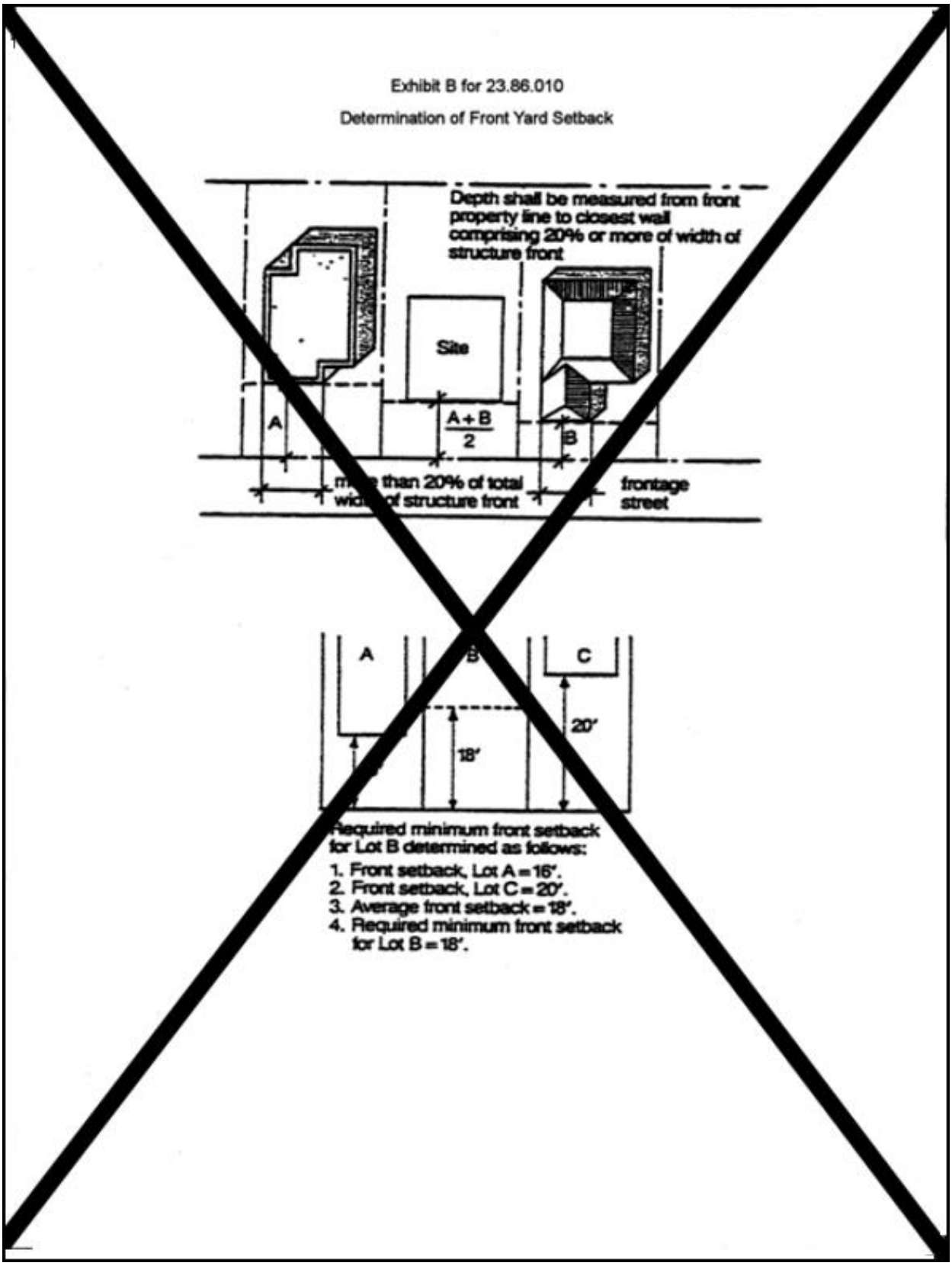
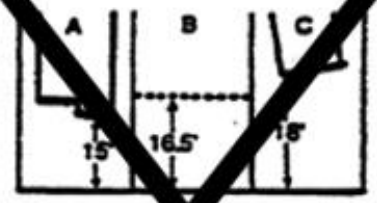


Exhibit B for 23.86.010
Determination of Front Yard Setback
Depth shall be measured from front property line to closest wall comprising 20% or more of width of structure front
Site
A
A+B
2
B
than 20% of total
of structure front
frontage
street
A
B
C
20'
18'
Required minimum front setback for Lot B determined as follows:
1. Front setback, Lot A = 16'.
2. Front setback, Lot C = 20'.
3. Average front setback = 18'.
4. Required minimum front setback for Lot B = 18'.

1

Exhibit C for 23.86.010

Calculating Minimum Required Front Yard
Unusual Front Walls



Minimum required front yard for Lot B:

1. Front yard, Lot A = 15'.
2. Front yard, Lot C = 18'.
3. Average front yard = 16.5'.
4. Required minimum front yard for lot B = 16.5'

1

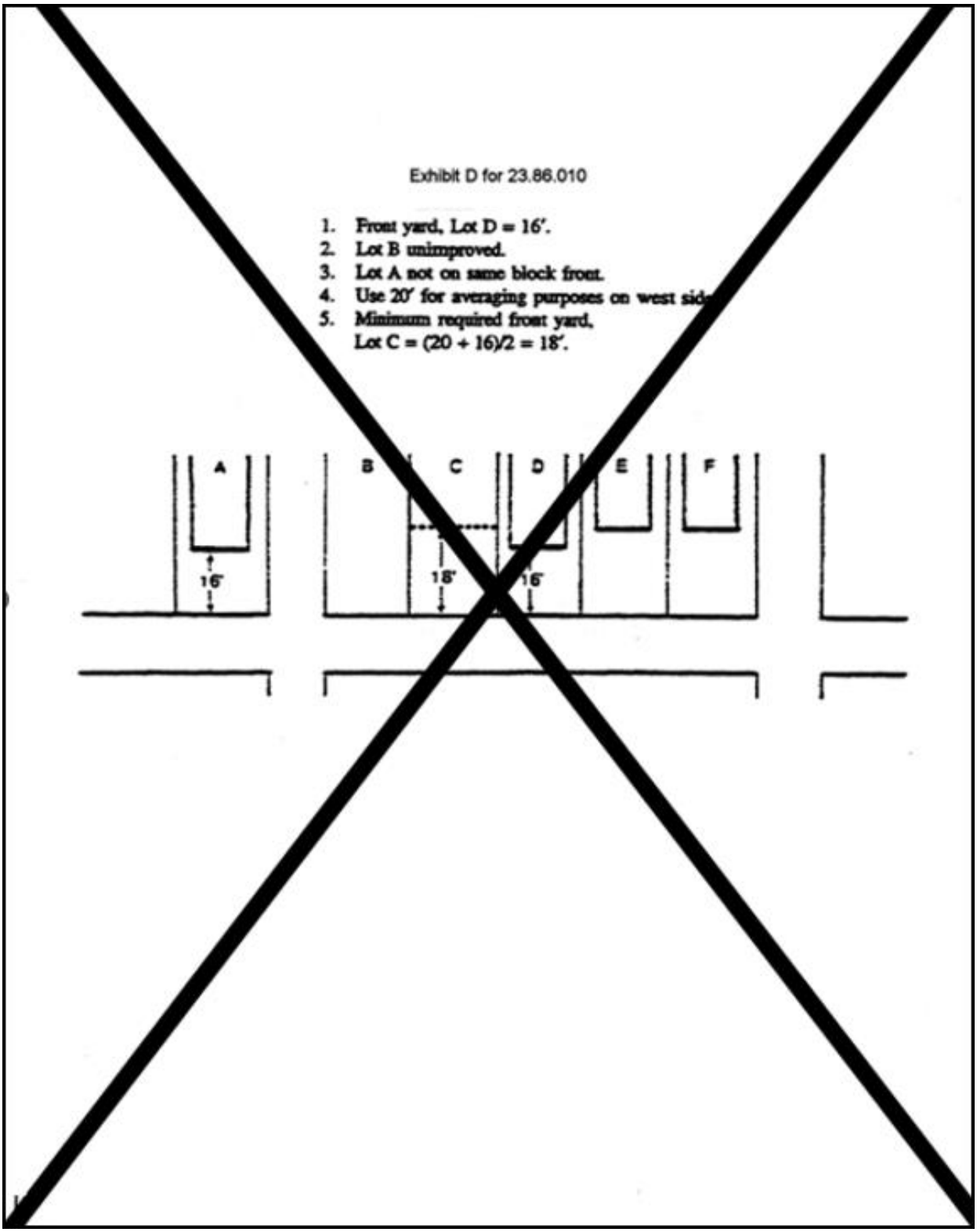


Exhibit D for 23.86.010
1. Front yard, Lot D = 16'.
2. Lot B unimproved.
3. Lot A not on same block front.
4. Use 20' for averaging purposes on west side
5. Minimum required front yard,
Lot C = (20 + 16)/2 = 18'.
A
B
C
D
E
F
16'
18'
16'

1

Exhibit E for 23.86.010

Minimum Required Front Yards, Adjoining Lots Unimproved

1. Front yard, Lot F = 18'.
2. Lots B, C, D unimproved.
3. Use 20' for averaging purposes on west side.
4. Minimum required front yard,
   Lot E = (20 + 18)/2 = 19'.

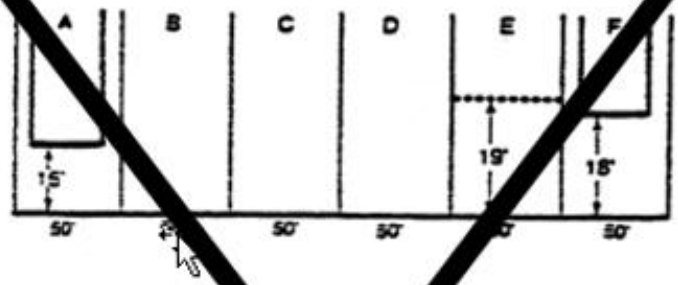
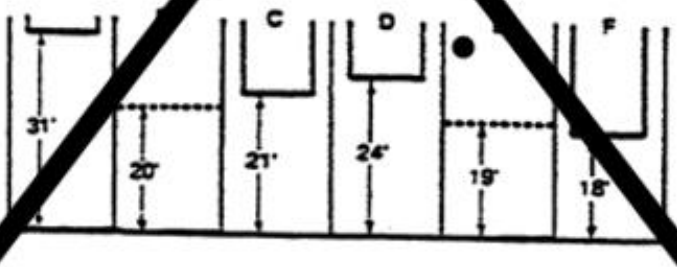


Exhibit F for 23.86.010

1. Minimum required front yard,
   Lot B = (20 + 20)/2 = 20'.
2. Minimum required front yard,
   Lot E = (20 + 18)/2 = 19'.



1

Section 92. Section 23.86.012 of the Seattle Municipal Code, last amended by Ordinance 125791, is amended as follows:

23.86.012 ((~~Multifamily and commercial zone setback~~)) Setback and separations measurement

A. For purposes of setback and separation standards, measurement shall be taken to the outside of building foundations and exterior walls rather than to exterior finishing provided that exterior finishes extend no more than 8 inches into a required setback.

B. Setback averaging. In multifamily and commercial zones, certain required setbacks may be averaged. In such cases ((~~the following provisions apply~~)):

1. The average front and rear setbacks are calculated based on the entire width of the structure;

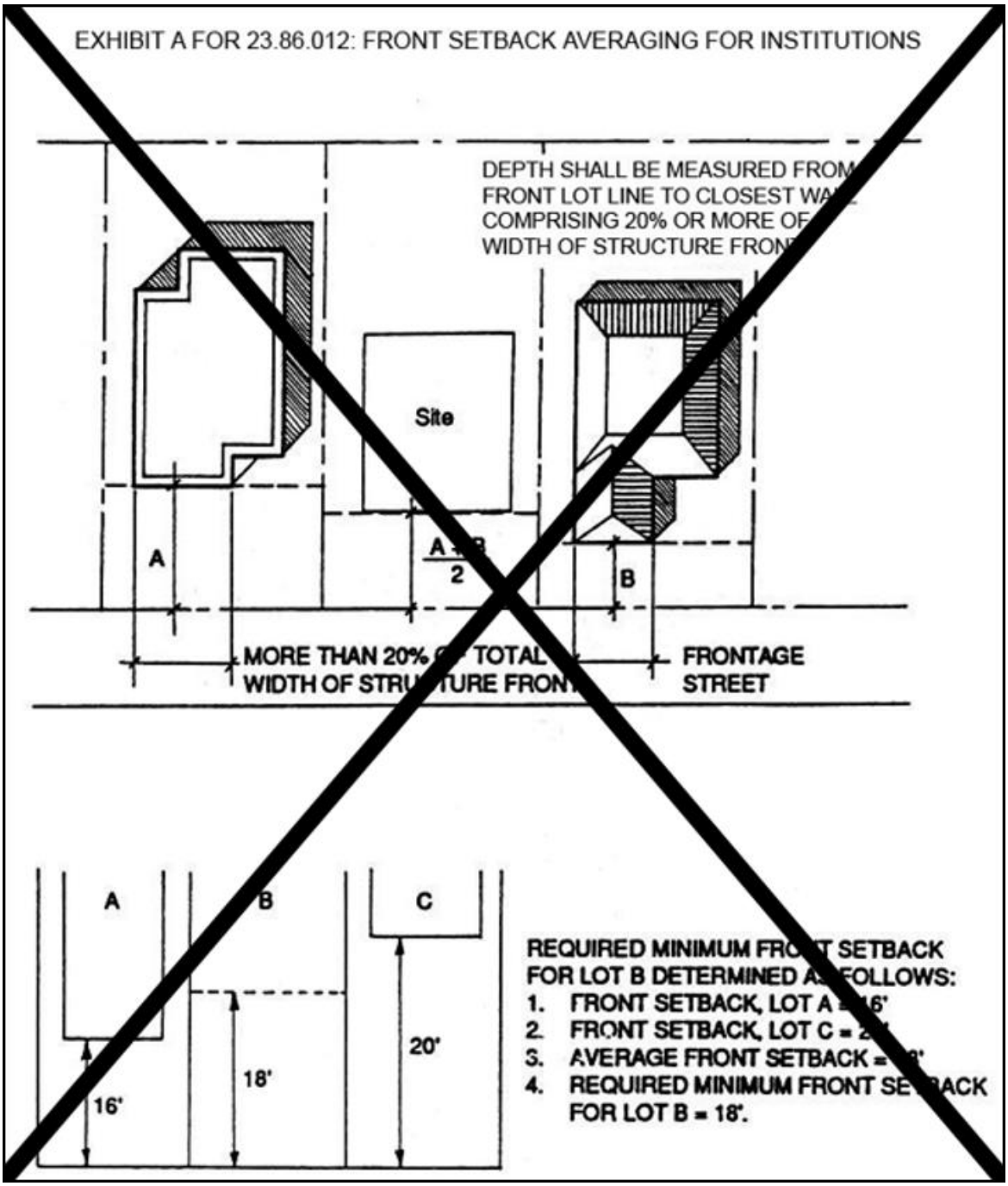
2. The average side setbacks are calculated based on the entire depth of the structure;

3. Setbacks are measured horizontally from the lot line to the facade of the structure. The facade(s) used in calculating the average and minimum setback requirements shall be those facades that are nearest to that lot line except that any features allowed to project into the setback are excluded.

((~~B. Determining front setbacks for institutions. In LR zones, the minimum required front setback for institutions is determined by averaging the setbacks of structures on either side of the subject lot, as follows:~~

~~1. The required front setback is the average of the distances between principal structures and front lot lines of the nearest principal structures on each side of the subject lot if~~

~~each of those structures is on the same block front as the subject lot and is within 100 feet of the side lot lines of the subject lot (Exhibit A for 23.86.012).~~



~~2. If the first principal structure within 100 feet of a side lot line of the subject lot is not on the same block front or there is no principal structure within 100 feet of the side lot line, the setback depth used for averaging purposes on that side is 7 feet.~~

~~3. For averaging purposes, the front setback is the shortest distance from the front lot line to the nearest wall or, where there is no wall, the plane between supports that span 20 percent or more of the width of the front facade of the principal structure. Attached garages and enclosed porches are considered part of the principal structure for measurement purposes. Decks less than 18 inches above existing grade, uncovered porches, eaves, attached solar collectors and other similar parts of the structure are not considered part of the principal structure.~~

~~4. If there is a dedication of street right-of-way to bring the street abutting the lot closer to the minimum widths established in Section 23.53.015, for averaging purposes the amount of dedication is subtracted from the front setbacks of the structures on either side.~~

~~5. If the front setback of the first principal structure within 100 feet of the side lot line of the subject lot exceeds 20 feet, the setback depth used for averaging purposes on that side is 20 feet.~~

~~6. In cases where the street is very steep or winding, the Director will determine which adjacent structures should be used for averaging purposes.~~

~~7. In the case of a through lot, the front setback is determined independently for each street frontage. The measurement techniques of this section 23.86.012 apply to each street frontage separately.~~

~~8. For multiple structures on the same lot, the front setback of a principal structure on the same lot may be used for averaging purposes.~~))

* * *

Section 93. Section 23.86.017 of the Seattle Municipal Code, enacted by Ordinance 123495, is amended as follows:

23.86.017 Amenity area measurement

((~~Certain zones require a minimum amount of amenity area to be provided on the lot.~~)) If amenity area is required, the following provisions shall apply:

A. If the applicable development standards specify a minimum contiguous amenity area, areas smaller than the minimum contiguous area are not to be counted toward fulfilling amenity area requirements.

1. Driveways and vehicular access easements, whether paved or unpaved, shall be considered to separate the amenity areas they bisect((~~, except for woonerfs permitted to qualify as required amenity area~~)).

2. Pedestrian access areas shall not be considered to break the contiguity of amenity area on each side.

B. In shoreline areas, when determining the amount of amenity area required or provided, no land waterward of the ordinary high water mark shall be included in the calculation.

C. In cases where the shape or configuration of the amenity area is irregular or unusual, the Director shall determine whether amenity area requirements have been met, notwithstanding the following provisions, based on whether the proposed configuration would result in amenity area that is truly usable for normal residential recreational purposes. For the purpose of measuring the minimum horizontal dimension of the amenity area, if one is specified, the following provisions shall apply:

1. For rectangular or square areas, each exterior dimension of the area shall meet the minimum dimension (Exhibit A for 23.86.017).

Exhibit A for ((~~Section~~)) 23.86.017((~~: Measurement of Regular Amenity Area~~))

Measurement of amenity area

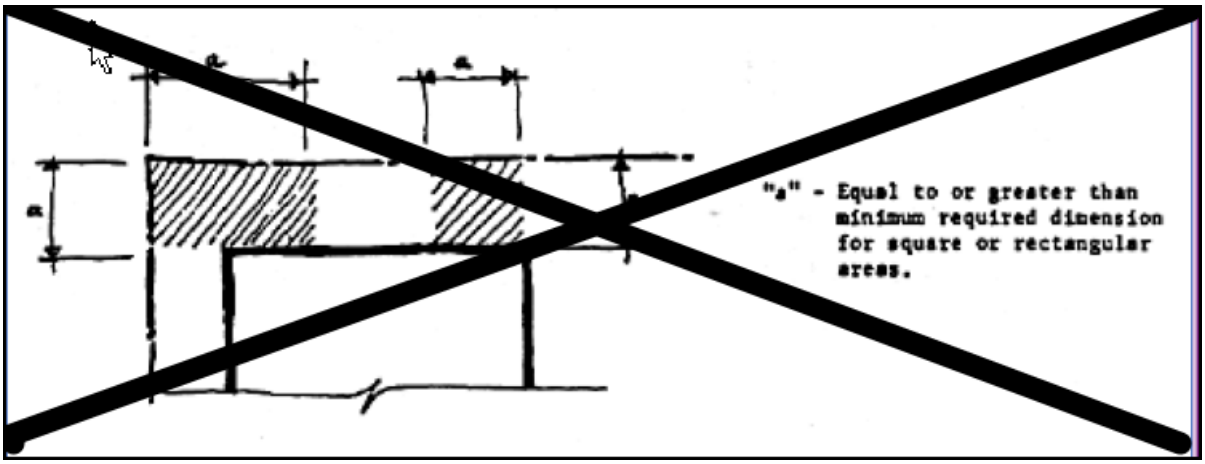
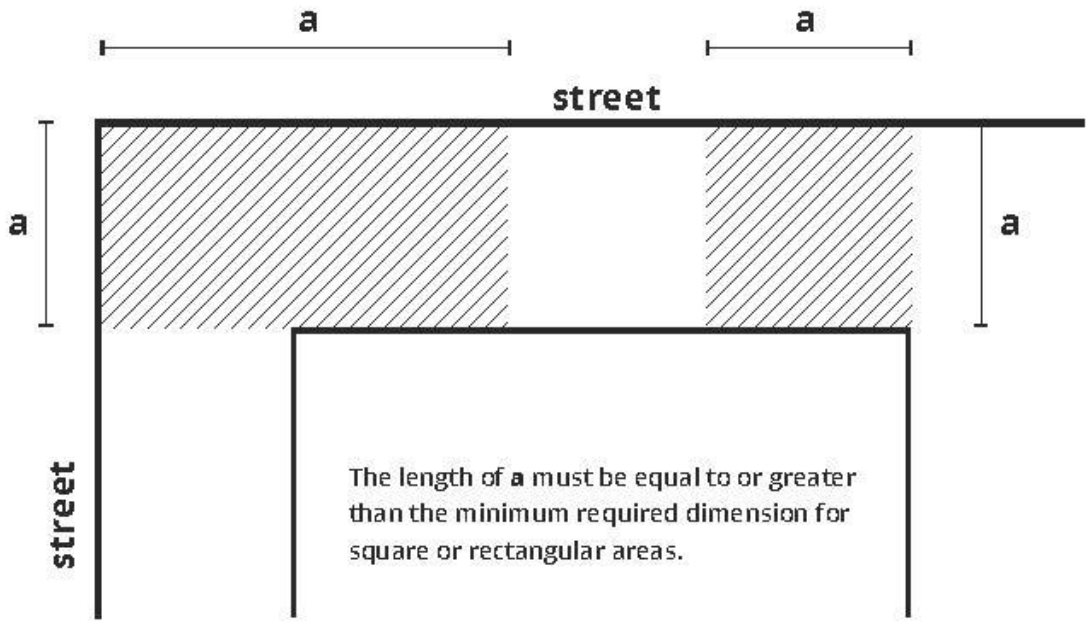


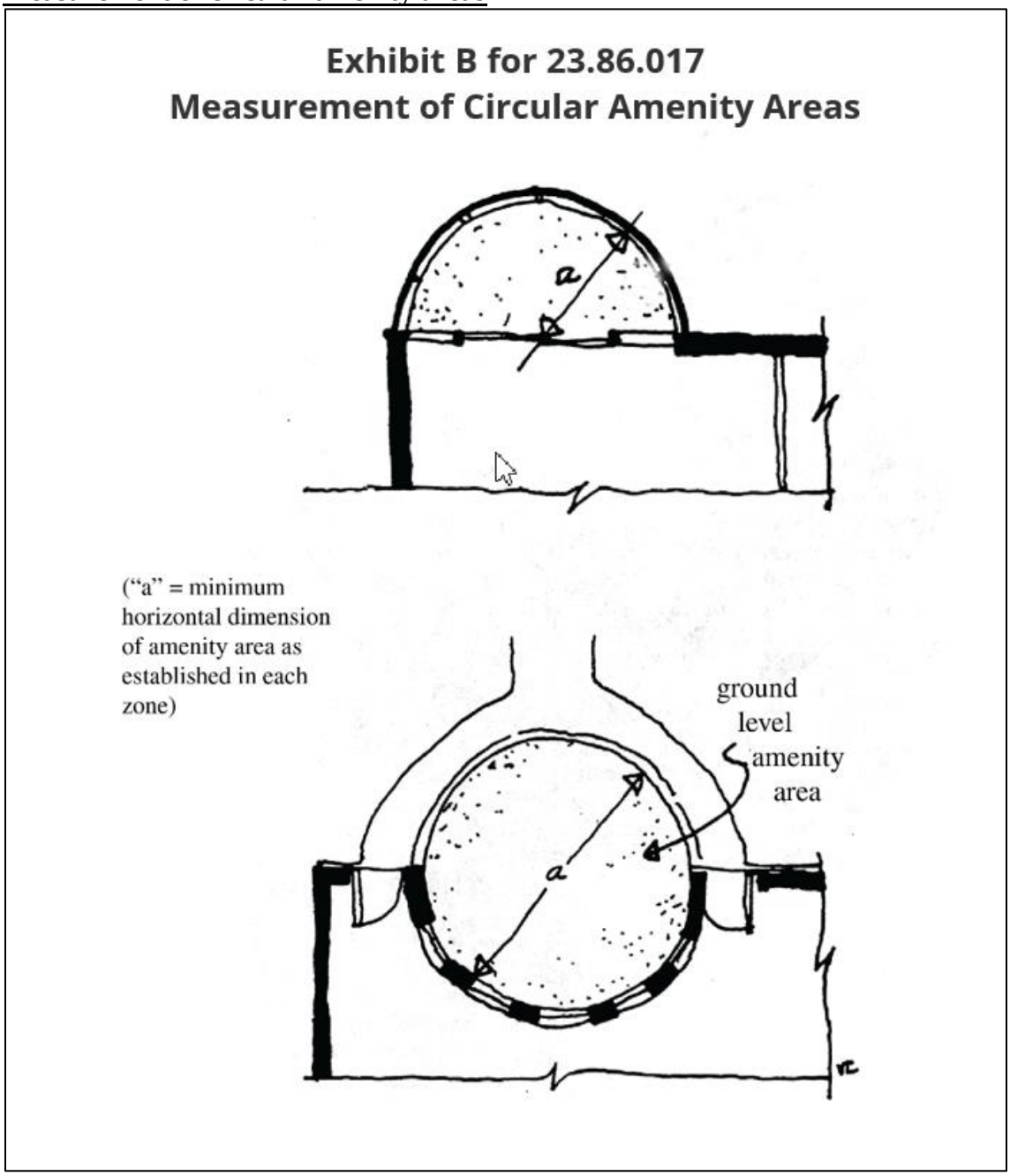
Exhibit A for 23.86.017
Measurement of amenity area



2. For circular areas, the diameter of the circle shall meet the minimum dimension((~~; for~~)) . For semicircular areas, the radius of the area shall meet the minimum dimension (Exhibit B for 23.86.017).

Exhibit B for 23.86.017((~~: Measurement of Circular Amenity Areas~~))

Measurement of circular amenity areas



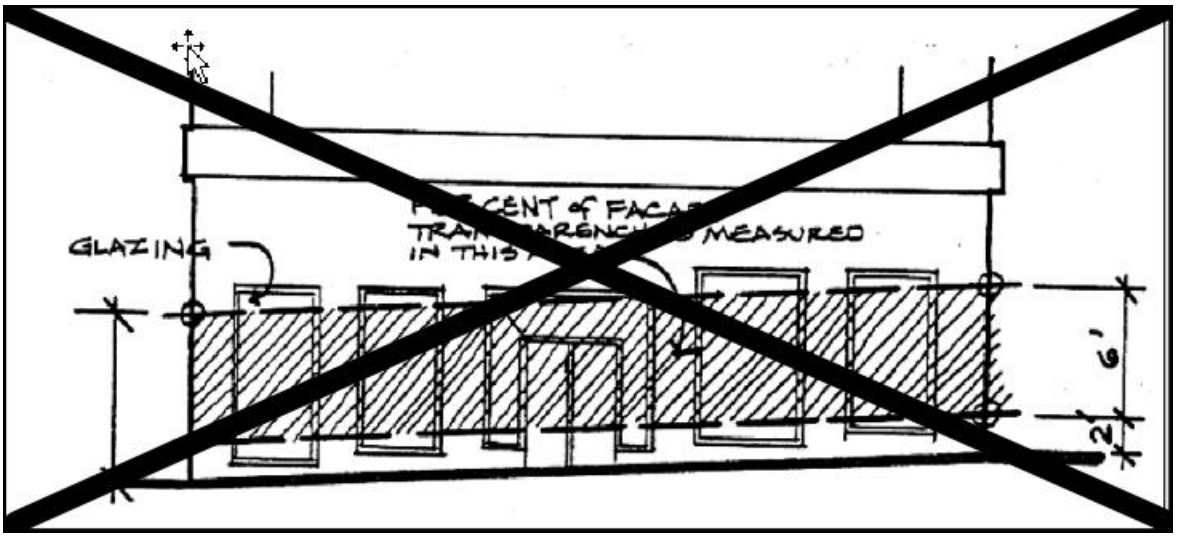
Section 94. Section 23.86.026 of the Seattle Municipal Code, last amended by Ordinance 124503, is amended as follows:

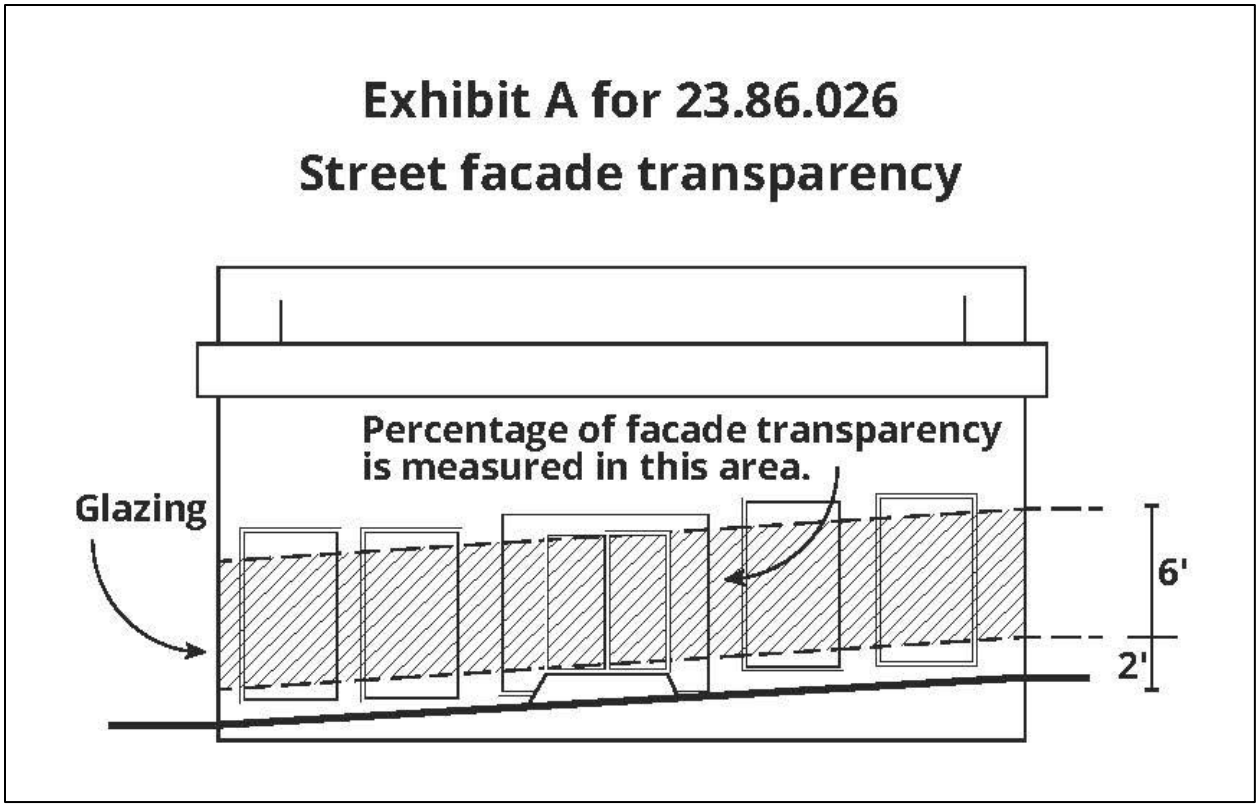
23.86.026 Facade transparency

A. In zones, other than Neighborhood Residential or Lowrise zones, where a certain percentage of the street-facing facade is required to be transparent, transparency shall be measured in an area between 2 feet and 8 feet above the elevation of the lot line at the sidewalk, as depicted in Exhibit A for 23.86.026, unless a different area is specified in the development standards applicable to the lot. Areaways, stairways, and other excavations at the lot line shall not be considered in measuring the elevation of the street lot line. When sidewalk widening is required according to Section 23.49.022, the elevation of the lines establishing the new sidewalk width shall be used rather than the street lot line.

Exhibit A for 23.86.026

Street ((~~Facade Transparency~~)) facade transparency





B. When transparency is required for facades that abut bonused public open spaces, the measurement of facade transparency shall be from the elevation of the public open space.

C. The full length of ((~~landmark~~)) Landmark designated structures, and character structures retained according to Section 23.73.015, shall not be counted in determining the required transparency.

Section 95. Section 23.90.019 of the Seattle Municipal Code, last amended by Ordinance 127211, is amended as follows:

23.90.019 Civil penalty for unauthorized dwelling units ((~~in neighborhood residential zones~~))

In addition to any other sanction or remedial procedure that may be available, the following penalties apply to unauthorized dwelling units ((~~in neighborhood residential zones in violation of Section 23.44.006~~)). An owner of a ((~~neighborhood residential zoned~~)) lot ((~~that has more than~~

~~one single-family dwelling unit and~~)) who is issued a notice of violation for an unauthorized dwelling unit((~~,~~)) is subject to a civil penalty of $5,000 for each ((~~additional~~)) unauthorized dwelling unit((~~, unless the additional unit is an authorized dwelling unit in compliance with Section 23.42.022, is a legal non-conforming use, or is approved as part of an administrative conditional use permit pursuant to Section 25.09.260~~)). Penalties for ((~~violation of Sections 23.44.006 and 23.44.022 except for those violations subject to subsection 23.90.018.B,~~)) unauthorized dwelling units in this Section 23.90.019 shall be reduced from $5,000 to $500 if, prior to the compliance date stated on the notice of violation for an unauthorized dwelling unit, the dwelling unit is removed or authorized ((~~, is a legal non-conforming use, or is approved as part of an administrative conditional use permit pursuant to Section 25.09.260~~)).

Section 96. Section 23.91.002 of the Seattle Municipal Code, last amended by Ordinance 126509, is amended as follows:

23.91.002 Scope of this Chapter 23.91

A. Violations of the following provisions of this Title 23 shall be enforced under the citation or criminal provisions set forth in this Chapter 23.91:

1. Junk storage in residential zones (((~~Chapter 23.44, Chapter 23.45, Chapter 23.46, Chapter 23.49 Subchapter IV, and Chapter 23.49 Subchapter VII~~))), unless the lot contains a vacant structure subject to the vacant building maintenance standards contained in subsection 22.206.200.A and a notice of violation has been issued requiring compliance with subsection 22.206.200.F;

2. Construction or maintenance of structures in required ((~~yards or~~)) setbacks in residential zones (((~~Chapter 23.44, Chapter 23.45, Chapter 23.46, Chapter 23.49 Subchapter IV, and Chapter 23.49 Subchapter VII~~)));

3. Parking of vehicles in a ((~~neighborhood residential~~)) Neighborhood Residential zone (Section ((~~23.44.016~~)) 23.44.160), unless the lot contains a vacant structure subject to the vacant building maintenance standards contained in subsection 22.206.200.A;

4. Keeping of animals (Section 23.42.052); and

((~~[5. Reserved.]~~

~~6.~~)) 5. The following violations of ((~~the Shoreline District,~~)) Chapter 23.60A:

a. Discharging, leaking, or releasing solid or liquid waste and untreated effluent, oil, chemicals, or hazardous materials into the water (subsection 23.60A.152.R);

b. Releasing debris and other waste materials from construction, maintenance, repair, or in operation or management of a property, into any water body (subsections 23.60A.152.H, 23.60A.152.I, 23.60A.152.T, and 23.60A.152.U);

c. Conducting activity in or over water outside the allowed work windows (subsection 23.60A.152.J); and

d. Closing required public access (Section 23.60A.164).

B. Any enforcement action or proceeding pursuant to this Chapter 23.91 shall not affect, limit, or preclude any previous, pending, or subsequent enforcement action or proceeding taken pursuant to Chapter 23.90.

Section 97. Section 25.09.052 of the Seattle Municipal Code, last amended by Ordinance 126685, is amended as follows:

25.09.052 Replacing structures in environmentally critical areas and buffers

* * *

B. Replacing a ((~~single-family residence~~)) detached dwelling unit voluntarily in wetlands, wetland buffers, and fish and wildlife habitat conservation areas

1. Replacing a ((~~single-family residence~~)) detached dwelling unit and its appurtenant structures and access is allowed in wetlands, wetland buffers, and fish and wildlife habitat conservation areas if the replacement complies with the following:

a. The replacement is in substantially the same location as the original development;

b. The area of the footprint of the replacement does not exceed that of the original development;

c. The proposed access does not exceed the width and length of necessary access;

d. Lot size

1) Riparian watercourse and wetlands. For a ((~~single-family residence~~)) detached dwelling unit located over a riparian watercourse or built in a wetland, the replaced ((~~residence~~)) dwelling unit and necessary access meets wetland buffer or riparian management area requirements to the maximum extent feasible; or

2) For all other property, the lot does not have sufficient area to site a ((~~residence~~)) dwelling unit with the same area of footprint as existed on May 14, 2017, plus necessary access, consistent with the regulations for the applicable environmentally critical area and buffer, including reducing the ((~~yard and~~)) front and/or rear setback requirements ((~~for front and rear yards in Title 23~~)) allowed under Section 25.09.280, except subsection 25.09.280.B.2, to the minimum necessary to accommodate the ((~~residence~~)) dwelling unit and necessary access; and

e. The site for the ((~~residence~~)) dwelling unit, necessary access, and utilities has the least impact on the functions and values of the environmentally critical area.

2. A structure that is replaced and activities related to replacing the structure shall:

a. Comply with restrictions on flood hazard areas reconstruction, if the structure is located in a flood-prone area; and

b. Comply with the development standards for the environmentally critical area and buffer in which it is located to the maximum extent feasible, including requirements for access and shall comply with the standards in Sections 25.09.060, 25.09.065, and 25.09.070; and

c. Mitigate impacts to the functions and values of the environmentally critical area and buffers, in compliance with Section 25.09.065, including any impacts caused by removing the ((~~residence~~)) dwelling unit from its original location, runoff from impervious surfaces, and/or replacing any portion of the ((~~residence~~)) dwelling unit within the environmentally critical area or buffer.

Section 98. A new Section 25.09.055 is added to the Seattle Municipal Code as follows:

25.09.055 Essential public facilities

If an essential public facility as defined in Section 23.84A.010 is proposed within an environmentally critical area as defined in Section 25.09.020, review of the proposed facility is subject to the provisions of Chapter 23.80.

Section 99. Section 25.09.240 of the Seattle Municipal Code, last amended by Ordinance 126509, is amended as follows:

25.09.240 Short subdivisions and subdivisions

* * *

C. Application submittal requirements. All short subdivision and subdivision applications, in addition to the application submittal requirements included in Title 23 and this Chapter 25.09,

shall include on the surveyed site plan the information required by this Section 25.09.240 ((~~and Section 25.09.260~~)), as applicable.

((~~D. Development standards for new lots in neighborhood residential zones. If new lots are created in neighborhood residential zones by short subdivision or subdivision, the following development standards apply based on the area of each new lot that is outside the environmentally critical areas listed in subsection 25.09.240.A, plus environmentally critical areas in which development is allowed pursuant to subsections 25.09.240.B.1, 25.09.240.B.2, and 25.09.240.B.3:~~

~~1. Lot coverage and lot coverage exceptions according to subsections 23.44.010.C and 23.44.010.D.~~

~~2. Height limits according to Section 23.44.012, including the requirements of subsection 23.44.012.A.3 if the area of the largest rectangle or other quadrilateral that can be drawn within the lot lines of the new lot outside the environmentally critical areas is less than 3,200 square feet.~~

~~E.~~)) D. Lots shall be configured to preserve the environmentally critical areas and buffers identified in subsection 25.09.240.A by:

1. Establishing a separate buffer tract or lot with each owner having an undivided interest; or

2. Establishing non-disturbance areas on individual lots.

((~~F.~~)) E. The environmentally critical areas and buffers identified in subsection 25.09.240.A, except for areas qualifying for development under subsections 25.09.240.B.1, 25.09.240.B.2, and 25.09.240.B.3, shall be designated non-disturbance areas on the final plat. A statement that these non-disturbance areas are located on the lots and the definition of "non-

disturbance area" shall be recorded in the King County Recorder's Office along with the final plat in a form approved by the Director. At the same time, a covenant protecting non-disturbance areas shall be recorded as set out in Section 25.09.335.

((~~G. In computing the number of lots a parcel in a neighborhood residential zone may contain, the Director shall exclude the following areas:~~

~~1. The environmentally critical areas and buffers identified in subsection 25.09.240.A, unless:~~

~~a. The environmentally critical areas and buffers are on a lot that meets the provisions of subsection 25.09.240.B; or~~

~~b. The applicant obtains an administrative conditional use under Section 25.09.260, if it is not practicable to meet the requirements of subsection 25.09.240.B considering the parcel as a whole.~~))

Section 100. Section 25.09.260 of the Seattle Municipal Code, last amended by Ordinance 126509, is repealed:

((~~25.09.260 Environmentally critical areas administrative conditional use~~

~~A. Administrative conditional use~~

~~1. In neighborhood residential zones the Director is authorized to approve an environmentally critical areas administrative conditional use pursuant to Section 23.42.042 and this Section 25.09.260 for one or both of the following purposes:~~

~~a. In calculating the maximum number of lots and units allowed on the entire parcel under subsection 25.09.240.G, the Director may count environmentally critical areas and/or buffers, except the open water area of a wetland or riparian corridor, that would~~

~~otherwise be excluded, if an applicant is unable to demonstrate compliance with the requirements of subsection 25.09.240.B for the entire parcel proposed to be subdivided.~~

~~b. For the entire parcel proposed to be subdivided, the Director may approve development of single family residences that meet the development standards of subsection 25.09.260.B.3 and the platting conditions in subsections 25.09.260.B.1 and 25.09.260.C.2.b. Except as specifically superseded by the development standards of subsection 25.09.260.B.3 and the platting conditions of subsection 25.09.260.C.2.b, all applicable regulations of Title 23 shall also apply to the entire parcel. The entire parcel is designated as the site.~~

~~2. Process. If an administrative conditional use application includes an application to authorize development in a steep slope erosion hazard area or buffer, the application is not required to include an application for the variances allowed under Sections 25.09.280 or 25.09.290, but the application must address the criteria listed in subsection 25.09.260.B.1.c.~~

~~B. Criteria. An application under this Section 25.09.260 shall provide information sufficient to demonstrate that the proposal meets the following criteria:~~

~~1. Environmental impacts on environmentally critical areas and buffers~~

~~a. No development is allowed in a biodiversity area or corridor, riparian corridor, wetland, or wetland buffer.~~

~~b. No riparian management area or wetland buffer is reduced.~~

~~c. No development is on a steep slope erosion hazard area or its buffer unless either the proposed development meets the criteria of subsections 25.09.090.B.2.a, 25.09.090.B.2.b, or 25.09.090.B.2.c or the property is a lot in existence as a legal building site~~

~~prior to October 31, 1992, is predominantly characterized by steep slope erosion hazard areas, and the following criteria are met:~~

~~1) The proposed development shall be located away from steep slope erosion hazard areas and buffers to the extent practicable.~~

~~2) The Director shall require clear and convincing evidence that the provisions of this subsection 25.09.260.B are met if development is located on steep slope erosion hazard areas and buffers with these characteristics:~~

~~a) A wetland over 1,500 square feet in size or a watercourse designated part of a riparian corridor;~~

~~b) An undeveloped area over 5 acres characterized by steep slope erosion hazard areas; or~~

~~c) Areas designated by the Washington Department of Fish and Wildlife (WDFW) as biodiversity areas and corridors, or areas identified by the Director with significant tree and vegetation cover providing wildlife habitat.~~

~~3) If the application includes a proposal to develop in a steep slope erosion hazard area or buffer, the development in the steep slope erosion hazard area or buffer shall be the minimum necessary to achieve the number of single family dwelling units that would be allowed on the original entire parcel according to the calculation for subdivision required under subsection 25.09.240.G in the following order of priority:~~

~~a) The proposal reduces the front and/or rear yards pursuant to subsection 25.09.260.B.3.b.1 and complies with the building separation standards of subsections 25.09.260.B.3.b.2 and 25.09.260.B.3.b.3;~~

~~b) The proposal reduces the steep slope erosion hazard area buffer; and~~

~~c) The proposal intrudes into not more than 30 percent of the steep slope erosion hazard area.~~

~~d. The proposal protects WDFW priority species and maintains wildlife habitat.~~

~~e. The proposal does not result in unmitigated negative environmental impacts pursuant to Section 25.09.065, including drainage and water quality, erosion, loss of trees and vegetation, and slope stability on the identified environmentally critical area and buffer.~~

~~f. The proposal promotes expansion, restoration, or enhancement of the identified environmentally critical area and buffer.~~

~~2. General environmental impacts and site characteristics~~

~~a. The proposal minimizes potential negative effects of the development on the undeveloped portion of the site and preserves topographic features.~~

~~b. The proposal retains and protects trees and vegetation on designated non-disturbance areas, protects stands of mature trees, minimizes tree removal, removes noxious weeds and non-native vegetation and replaces this vegetation with native trees and vegetation, and protects the visual continuity of treed and vegetated areas and tree canopy.~~

~~3. Development standards~~

~~a. The total number of single-family dwelling units permitted through the environmentally critical areas conditional use regulations shall not exceed the number that would be allowed based on compliance with the use regulations of Section 23.44.008, and the minimum lot area standards of the underlying neighborhood residential zone, and shall be established only~~

~~on the site comprised of the original entire parcel, with subdivision of the original entire parcel allowed only as unit lots approved through the unit lot subdivision process in Section 25.09.260.C.2.b.2.~~

~~b. Single-family dwelling units shall be the sole type of principal use permitted through the environmentally critical areas conditional use regulations and shall meet the development standards of Chapter 23.44, except that the following standards apply instead of the standards in Chapter 23.44, as applicable:~~

~~1) Front and rear yards required by subsections 23.44.014.A and 23.44.014.B may be reduced to no less than 10 feet each and 30 feet for the sum of both yards if the reduction would minimize or eliminate any intrusion into the steep slope erosion hazard area or required buffer;~~

~~2) Front and rear building separations between proposed single family residences shall be a minimum of 25 feet;~~

~~3) Side building separations shall be a minimum of 10 feet;~~

~~4) The maximum lot coverage shall be calculated by deducting required non-disturbance areas from total lot size; and~~

~~5) Front, rear, and side separations shall be determined by the Director, based on location of the building in relation to other buildings and the front lot line.~~))

~~C. Conditions~~

~~1. In authorizing an administrative conditional use, mitigation pursuant to Section 25.09.065 shall apply to protect and mitigate negative impacts to biodiversity areas and corridors, priority habitat and setbacks, riparian corridors, wetlands, wetland buffers, and steep slope erosion hazard areas and buffers, and the Director may impose additional conditions to~~

~~protect other properties that could be adversely affected in the zone or vicinity in which the property is located.~~

~~2. In addition to any conditions imposed under subsection 25.09.260.C.1, the following conditions apply to all administrative conditional uses approved under this Section 25.09.260:~~

~~a. Replacement and establishment of native trees and vegetation shall be required where it is not possible to save trees and vegetation and shall comply with Section 25.09.070.~~

~~b. If a subdivision or short subdivision is proposed, the following standards apply:~~

~~1) The development as a whole shall meet development standards under Title 23 and this Chapter 25.09 applicable at the time the application is vested.~~

~~2) A unit lot short subdivision or unit lot subdivision proposal shall be required to ensure that the development standards of subsection 25.09.260.B.3 are implemented for development. New unit lots created under this Section 25.09.260 shall be approved through the unit lot subdivision regulations of Sections 23.22.062 and 23.24.045 and by compliance with this Section 25.09.260. Development on individual unit lots, except as otherwise set forth in this Section 25.09.260, may be nonconforming as to some or all of the development standards.~~

~~3) Subsequent platting actions or additions or modifications to structures may not create or increase any nonconformity of the development as a whole to this Chapter 25.09, and this shall be noted on the document creating the new unit lots that is recorded with the King County Recorder's Office.~~

~~4) Access easements and joint use and maintenance agreements shall be executed for use of common garage or parking areas, common open space, and other similar features and be recorded with the King County Recorder's Office.~~

~~D. The Director shall issue written findings of fact and conclusions to support the Director's decision. The process and procedures for notice of decision and appeal of this administrative conditional use shall be as prescribed for Type II land use decisions in Chapter 23.76.~~))

Section 101. Section 25.09.300 of the Seattle Municipal Code, last amended by Ordinance 125292, is amended as follows:

25.09.300 Environmentally critical area exception

A. Types of exceptions

1. General. An applicant for a City permit to develop real property that is located in an environmentally critical area or buffer may apply to the Director for an exception to modify environmentally critical area development standards, provided that an applicant cannot apply for an exception to allow development ((~~or to obtain development credit under subsection 25.09.240.G~~)) or to relocate lot lines under Section 23.28.030. An applicant seeking relief under this Section 25.09.300 shall demonstrate that no other applicable administrative remedies in this Chapter 25.09 or Title 23 will provide sufficient relief.

2. Public projects. If development in an environmentally critical area or buffer is necessary to accommodate a public facility or public utility, the Director may grant an exception permitting the public facility or public utility using the following criteria in lieu of subsections 25.09.300.C and 25.09.300.D:

a. No reasonable alternative location will accommodate the facility or utility, as demonstrated by an analysis of appropriate alternative locations provided by the applicant or the Director;

b. Mitigation sequencing under Section 25.09.065 is applied to the siting, design, and construction of the facility or utility; and

c. All requirements of subsections 25.09.300.A.1, 25.09.300.B, 25.09.300.E, and 25.09.300.F apply((~~; and~~

~~d. In granting an exception to the development standards in Sections 25.09.090, 25.09.160, and 25.09.200 the Director shall apply the mitigation standards in Section 25.09.065 when imposing any conditions~~)).

* * *

Section 102. Section 25.09.520 of the Seattle Municipal Code, last amended by Ordinance 126685, is amended as follows:

25.09.520 Definitions

* * *

"Department" means the Seattle Department of Construction and Inspections or its successor department.

"Detached dwelling unit" means a detached dwelling unit as defined in Section 23.84A.008.

* * *

((~~"Single-family residence" means single-family dwelling unit as defined in Section 23.84A.032 in the definition of "residential use."~~))

* * *

Section 103. A new Section 25.11.025 is added to the Seattle Municipal Code as follows:

25.11.025 Essential public facilities

If this Chapter 25.11 applies to a proposal for an essential public facility as defined in Section 23.84A.010, review of the proposed facility is subject to the provisions of Chapter 23.80.

Section 104. Section 25.11.090 of the Seattle Municipal Code, last amended by Ordinance 126821, is amended as follows:

25.11.090 Tree replacement, maintenance, and site restoration

A. In all zones, Tier 1, Tier 2, and Tier 3 trees removed in association with development or because they are hazardous, infested by insects, pests, or pathogens, or an invasive or nuisance tree, or in accordance with the removal criteria in subsection 25.11.050.D, shall be replaced by one or more new trees, the size and species of which shall be determined by the Director; the tree replacement required shall be designed to result, upon maturity, in a canopy cover that is at least roughly proportional to the canopy cover prior to tree removal. Site restoration where there is on-site tree replacement in association with development shall include the removal of all invasive vegetation and shall prohibit replacement with invasive species. When on-site replacement is proposed, such trees count toward the Green Factor under ((~~SMC~~)) Section 23.86.019 and private property tree point requirements under Section 23.44.120. When off-site replacement is proposed, preference for the location shall be on public property.

* * *

Section 105. Ordinance 127219, implementing interim controls to comply with various state laws and attached to this ordinance as Attachment 3, is repealed. This ordinance shows Seattle Municipal Code sections common to both ordinances as if the repealed ordinance did not take effect.

Section 106. This ordinance shall take effect as provided by Seattle Municipal Code Sections 1.04.020 and 1.04.070.

Passed by the City Council the _____ day of _____, 2025, and signed by me in open session in authentication of its passage this _____ day of _____, 2025.

_____

President _____ of the City Council

Approved / returned unsigned / vetoed this _____ day of _____, 2025.

_____

Bruce A. Harrell, Mayor

Filed by me this _____ day of _____, 2025.

_____

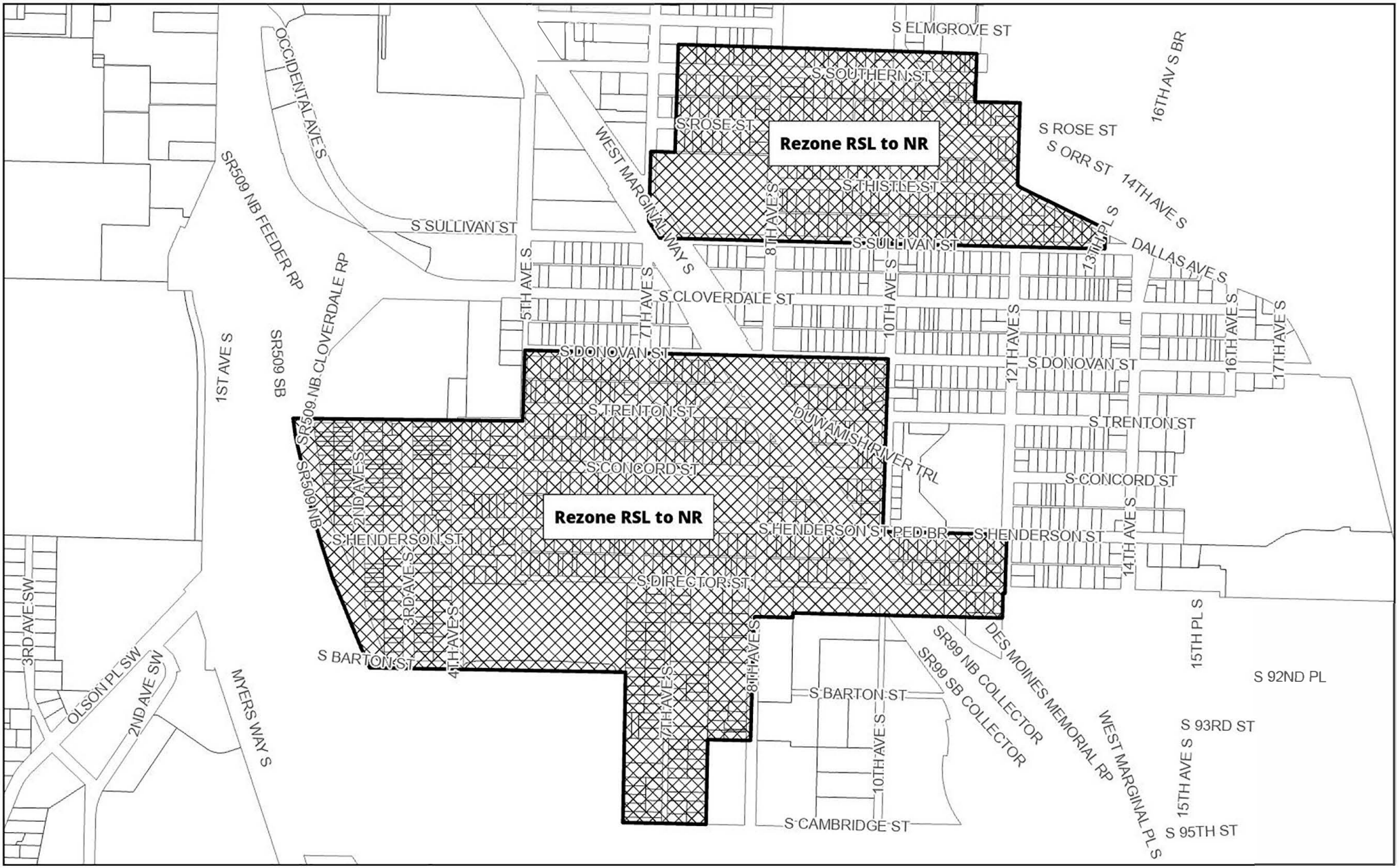
Scheereen Dedman, City Clerk

(Seal)

Attachments:
Attachment 1 – Map of Specific Rezone Areas
Attachment 2 – Repealed Text of Chapter 23.44
Attachment 3 – Ordinance 127219

Att 1 - Map of Specific Rezone Areas
V1

Map 1



0 450 900 1,800 feet

Area identified for specific rezone

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Prepared Thursday, February 13, 2025, by OPCD.

ATTACHMENT 2 - REPEALED TEXT OF CHAPTER 23.44

Chapter 23.44 NEIGHBORHOOD RESIDENTIAL

23.44.002 Scope of provisions

A. This Chapter 23.44 establishes regulations for the following neighborhood residential zones: NR1, NR2, NR3, and RSL, zones.

B. Some land in these zones may be regulated by Subtitle III, Division 3, Overlay Districts, of this Title 23 in addition to the standards of this Chapter 23.44.

C. Other regulations, including but not limited to general use provisions (Chapter 23.42); requirements for streets, alleys, and easements (Chapter 23.53); standards for parking quantity, access, and design (Chapter 23.54); standards for solid waste storage (Chapter 23.54); sign regulations (Chapter 23.55); communication regulations (Chapter 23.57); and methods for measurements (Chapter 23.86) may apply to development proposals.

Subchapter I Principal Uses Permitted Outright

23.44.006 Principal uses permitted outright

The following principal uses are permitted outright in neighborhood residential zones:

A. Single-family dwelling unit;

B. In RSL zones, apartments, carriage houses, cottage housing development, rowhouse development, and townhouse developments;

C. Floating homes, subject to the requirements of Chapter 23.60A;

D. Parks and open space, and community gardens;

E. Existing railroad right-of-way;

F. Public schools meeting development standards. New public schools or additions to existing public schools, and accessory uses including child care centers, subject to the special

development standards and departures from standards contained in Chapter 23.51B, except that departures from development standards may be permitted or required pursuant to procedures and criteria established in Chapter 23.79;

G. Uses in existing or former public schools:

1. Child care centers, public or private schools, educational and vocational training for the disabled, adult evening education classes, nonprofit libraries, community centers, community programs for the elderly, and similar uses are permitted outright in existing or former public schools, provided that any new children's play equipment or active play area associated with the use shall be located at least 20 feet from any other lot in any residential zone.

2. Other non-school uses in existing or former public schools, if permitted pursuant to procedures established in Chapter 23.78.

3. Additions to existing public schools only when the proposed use of the addition is a public school;

H. Nursing homes. Nursing homes meeting the development standards of this Chapter 23.44, and limited to eight or fewer residents;

I. Adult family homes. Adult family homes, as defined and licensed by the state of Washington;

J. Commercially operating horse farms in existence before July 1, 2000, on lots greater than ten acres, conforming to the limits on the number and location of farm animals and structures containing them set forth in Section 23.42.052;

K. Child care centers;

L. Community centers that do not provide shelter services;

M. Community farms; and

N. Libraries.

23.44.007 Mandatory Housing Affordability in RSL zones

RSL zones that have a mandatory housing affordability suffix are subject to the provisions of Chapters 23.58B and 23.58C.

23.44.008 Development standards for uses permitted outright

A. The development standards set out in this Subchapter I apply to principal and accessory uses permitted outright in neighborhood residential zones.

B. All structures or uses shall be built or established on a lot or lots.

C. Floating homes are subject to the provisions of Chapter 23.60A and are also subject to the parking provisions of this Chapter 23.44.

D. An exception from one specific standard does not relieve the applicant from compliance with any other standard.

E. Methods for measurements are provided in Chapter 23.86. Standards for parking access and design are provided in Chapter 23.54.

F. Any structure occupied by a permitted principal use other than single-family residential use may be converted to single-family residential use even if the structure does not conform to the development standards for single-family structures. Expansions of converted nonconforming structures are regulated by Section 23.42.108. Conversion of structures occupied by nonconforming uses is regulated by Sections 23.42.108 and 23.42.110.

G. Development standards governing lots containing an environmentally critical area or buffer may be modified according to the provisions of Chapter 25.09.

H. Exterior lighting shall be shielded and directed away from residentially zoned lots. The Director may require that the intensity of illumination be limited and that the location of the lighting be changed.

23.44.009 Design standards in RSL zones

In RSL zones, the following provisions apply:

A. Pedestrian access at least 3 feet in width shall be provided between each principal structure and the street. This access may be over a driveway and may cross any required yards or interior separation. The pedestrian access may be part of a driveway, provided that the pathway is differentiated from the driveway by pavement color, texture, or similar technique.

B. Each dwelling unit with a street-facing facade or each apartment structure with a street-facing facade, that is located within 40 feet of a street lot line shall have a pedestrian entry or front door on that street-facing facade. For dwelling units or apartment structures on corner lots, a pedestrian entry or front door is required on only one of the street-facing facades. The pedestrian entry or front door shall be marked with a covered stoop, porch, or other similar architectural entry feature.

23.44.010 Minimum lot area and lot coverage

A. Minimum lot area. The minimum lot area in neighborhood residential zones shall be as provided in Table A for 23.44.010:

Table A for 23.44.010 Minimum lot area	
Zone	**Minimum lot area required**
NR1	9,600 square feet
NR2	7,200 square feet
NR3	5,000 square feet
RSL	No minimum lot area[1]
Footnote to Table A for 23.44.010 [1] In RSL zones, there is no minimum lot area; however, the maximum number of dwelling units on a lot is limited by the density limits in subsection 23.44.017.B.	

Submerged lands shall not be counted in calculating the area of lots for the purpose of these minimum lot area requirements, or the exceptions to minimum lot area requirements provided in this Section 23.44.010. A parcel that does not meet the minimum lot area requirements or exceptions of this Section 23.44.010, and that is in common ownership with an abutting lot when the abutting lot is the subject of any permit application, shall be included as a part of the abutting lot for purposes of the permit application.

B. Exceptions to minimum lot area requirements. The following exceptions to minimum lot area requirements are allowed in NR1, NR2, and NR3 zones, subject to the requirements in subsection 23.44.010.B.2, and further subject to the requirements in subsection 23.44.010.B.3 for any lot less than 3,200 square feet in area:

1. A lot that does not satisfy the minimum lot area requirements of its zone may be developed or redeveloped under one of the following circumstances:

a. "The Seventy-Five/Eighty Rule." The Seventy-Five/Eighty Rule exception may be applied to allow separate development of lots already in existence in their current configuration, or new lots resulting from a full subdivision, short subdivision, or lot boundary adjustment. In order to qualify for this exception, the lot must have an area at least 75 percent of the minimum required for the zone and also at least 80 percent of the mean area of the lots within the same block front, subject to the following provisions:

1) To be counted as a separate lot for the purposes of calculating the mean area of the lots on a block front, a lot must be entirely within a neighborhood residential zone, and must be currently developed as a separate building site or else currently qualify for separate development based on facts in existence as of the date a building permit, full

or short subdivision, or lot boundary adjustment application is filed with the Department. The existence of structures or portions of structures on the property that is the subject of the application may be disregarded when the application indicates the structures or portions of structures will be demolished. In cases where this exception is applied for the purpose of a lot boundary adjustment, the calculation shall be based on the existing lots as they are configured before the adjustment.

2) To be counted as a separate lot for the purposes of calculating the mean area of the lots on a block front, a lot must have at least 10 feet of frontage on the street the calculation is applied to.

3) Publicly owned properties and public or private lots developed with non-residential uses such as parks or institutional uses may be excluded from the calculation. There must, however, be at least one lot on the block front used for the calculation other than the property that is the subject of the platting, lot boundary adjustment, or building permit application that this exception is being applied to.

4) If property is to be subdivided or its lot lines are modified by a lot boundary adjustment that increases the number of lots that qualify for separate development, the property subject to the subdivision, or the lots modified by the lot boundary adjustment, shall be excluded from the block front mean area calculation.

5) For purposes of this subsection 23.44.010.B.1.a, if the platting pattern is irregular, the Director will determine which lots are included within a block front.

6) If an existing or proposed lot has frontage on more than one street, the lot may qualify for this exception based on the calculation being applied to any street on which the lot has at least 30 feet of frontage. If a proposed lot has frontage on multiple streets

but does not have 30 feet of frontage on any street, the exception may be applied based on the calculation along the street on which the lot has the most frontage, provided the lot has at least 10 feet of frontage on that street. If the lot has less than 30 feet of frontage on any one street but equal frontage on multiple streets, the rule may be applied based on the calculation along any one of the streets, provided the lot has at least 10 feet of frontage on that street.

7) New lots created pursuant to subsection 23.44.010.B.1.a shall comply with the following standards:

a) For a lot that is subdivided or short platted, the configuration requirements of subsections 23.22.100.C.3 and 23.24.040.A.9 or with the modification provisions of subsections 23.22.100.D and 23.24.040.B, as applicable; or

b) For an existing lot that is reconfigured under the provisions of Chapter 23.28, the configuration requirements of subsection 23.28.030.A.3 or with the modification provisions of subsection 23.28.030.A.4.

b. The lot area deficit is the result of a dedication or sale of a portion of the lot to the City or state for street or highway purposes, payment was received for only that portion of the lot, and the lot area remaining is at least 2,500 square feet.

c. The lot would qualify as a legal building site under subsection 23.44.010.B but for a reduction in the lot area due to court-ordered adverse possession, and the amount by which the lot was so reduced was less than ten percent of the former area of the lot. This exception does not apply to lots reduced to less than 2,500 square feet.

d. The historic lot exception. The historic lot exception may be applied to allow separate development of lots already in existence if the lot has an area of at least 2,500 square feet, and was established as a separate building site in the public records of the county or

City prior to July 24, 1957, by deed, contract of sale, platting, or building permit. The qualifying lot shall be subject to the following provisions:

1) A lot is considered to have been established as a separate building site by deed if the lot was held under separate ownership from all abutting lots for at least one year after the date the recorded deed transferred ownership. A lot is considered to have been established as a separate building site by contract of sale only if that sale would have caused the property to be under separate ownership from all abutting lots.

2) If two contiguous lots have been held in common ownership at any time after January 18, 1987, and a principal structure extends onto or over both lots, neither lot qualifies for the exception. If the principal structure does not extend onto or over both lots, but both lots were required to meet development standards other than parking requirements in effect at the time the structure was built or expanded, neither lot qualifies for the exception unless the vacant lot is not needed to meet current development standards other than parking requirements. If the combined property fronts on multiple streets, the orientation of the principal structure shall not be considered when determining if it could have been built to the same configuration without using the vacant lot or lots as part of the principal structure's building site.

3) Lots that do not otherwise qualify for this exception cannot qualify as a result of all or part of a principal structure being removed or destroyed by fire or act of nature that occurred on or after January 18, 1987. Lots may, however, qualify as a result of removing from the principal structure minor features that do not contain enclosed interior space, including but not limited to eaves and unenclosed decks.

4) If parking for an existing principal structure on one lot has been provided on an abutting lot and parking is required under Chapter 23.54 the required parking for

the existing house shall be relocated onto the same lot as the existing principal structure in order for either lot to qualify for the exception.

e. The lot is within a clustered housing planned development pursuant to Section 23.44.024, a planned residential development pursuant to Section 23.44.034, or a development approved as an environmentally critical areas conditional use pursuant to Section 25.09.260.

f. If a lot qualifies for an exception to the lot area requirement under subsection 23.44.010.B.1.a, 23.44.010.B.1.b, 23.44.010.B.1.c, 23.44.010.B.1.d, or 23.44.010.B.1.e, the boundaries between that lot and contiguous lots on the same block face that also qualify for separate development may be adjusted through the lot boundary adjustment process if the adjustment maintains the existing lot areas, increases the area of a qualifying substandard lot without reducing another lot below the minimum permitted lot area, or causes the areas of the lots to become more equal provided the number of parcels qualifying for separate development is not increased.

2. Limitations

a. Development may occur on a substandard lot containing a riparian corridor, a wetland and wetland buffer, or a steep slope and steep slope buffer pursuant to the provisions of Chapter 25.09 or containing priority freshwater habitat or priority saltwater habitat described in Section 23.60A.160, only if one of the following conditions applies:

1) The substandard lot is not held in common ownership with an abutting lot or lots at any time after October 31, 1992, or

2) The substandard lot is held in common ownership with an abutting lot or lots, or has been held in common ownership at any time after October 31, 1992, if

proposed and future development will not intrude into the environmentally critical area or buffer or priority freshwater habitat or priority saltwater habitat described in Section 23.60A.160.

b. Lots on totally submerged lands do not qualify for any minimum lot area exceptions.

3. Special exception review for lots less than 3,200 square feet in area. A special exception Type II review as provided for in Section 23.76.006 is required for separate development of any lot that has not been previously developed as a separate lot and has an area less than 3,200 square feet that qualifies for any lot area exception in subsection 23.44.010.B.1. The special exception application shall be subject to the following provisions:

a. The depth of any structure on the lot shall not exceed two times the width of the lot. If a side yard easement is provided according to subsection 23.44.014.C.3, the portion of the easement within 5 feet of the structure on the lot qualifying under this subsection 23.44.010.B.3 may be treated as a part of that lot solely for the purpose of determining the lot width for purposes of complying with this subsection 23.44.010.B.3.a.

b. Windows in a proposed principal structure facing an existing abutting lot that is developed with a house shall be placed in manner that takes into consideration the interior privacy in abutting houses, provided that this subsection 23.44.010.B.3.b shall not prohibit placing a window in any room of the proposed house.

c. In approving a special exception review, additional conditions may be imposed that address window placement to address interior privacy of existing abutting houses.

C. Maximum lot coverage

1. The maximum lot coverage permitted for principal and accessory structures is as provided in Table B for 23.44.010.

Table B for 23.44.010 Maximum lot coverage		
Zone	**Lot size**	**Maximum lot coverage**
NR1, NR2, and NR3	Less than 5,000 square feet	1,000 square feet plus 15 percent of lot area
	5,000 square feet or more	35 percent of lot area
RSL	All lots	50 percent of lot area

2. For purposes of computing maximum lot coverage, only those portions of a lot that measure at least 10 feet in all directions shall be included in lot coverage calculations, except for portions of a lot that are used for access or that are granted a waiver under subsections 23.22.100.D, 23.24.040.B, or 23.28.030.A.4 for the purpose of providing access.

D. Lot coverage exceptions

1. Lots abutting alleys. For purposes of computing the lot coverage only:

a. The area of a lot with an alley or alleys abutting any lot line may be increased by one-half of the width of the abutting alley or alleys.

b. The total lot area for any lot may not be increased by the provisions of this Section 23.44.010 by more than ten percent.

2. Special structures and portions of structures. The following structures and portions of structures are not counted in lot coverage calculations:

a. Access bridges

1) Uncovered, unenclosed pedestrian bridges 5 feet or less in width and of any height necessary for access,

2) Uncovered, unenclosed vehicular bridges no wider than 12 feet for access to one parking space or 18 feet for access to two parking spaces and of any height necessary for access;

b. Barrier-free access. Ramps or other access for the disabled or elderly that comply with the Seattle Building Code, Chapter 11;

c. Decks. Decks or parts of a deck that are 36 inches or less above existing grade;

d. Freestanding structures and bulkheads. Fences, freestanding walls, bulkheads, signs, and other similar structures;

e. Underground structures. An underground structure, or underground portion of a structure;

f. Eaves and gutters. The first 36 inches of eaves and gutters that project from principal and accessory structures;

g. Solar collectors and swimming pools. Solar collectors that comply with Section 23.44.046 and swimming pools that comply with Section 23.44.044.

23.44.011 Floor area in neighborhood residential zones

A. Gross floor area. In neighborhood residential zones, gross floor area includes exterior corridors, breezeways, and stairways that provide building circulation and access to dwelling units or sleeping rooms. Balconies, patios, and decks that are associated with a single dwelling unit or sleeping room and that are not used for common circulation, and ground-level walking paths, are not considered gross floor area.

B. Floor area ratio (FAR) limits.

1. The FAR limit on lots developed with a single-family dwelling unit as the principal use in NR1, NR2, and NR3 zones, is 0.5, except that lots with less than 5,000 square feet of lot area can include up to 2,500 square feet of total chargeable floor area. The applicable FAR limit applies to the total chargeable floor area of all structures on the lot.

2. The FAR limit in RSL zones is 0.75. The applicable FAR limit applies to the total chargeable floor area of all structures on the lot.

C. The following floor area is exempt from FAR limits:

1. All stories, or portions of stories, that are underground.

2. All portions of a story that extend no more than 4 feet above existing or finished grade, whichever is lower, excluding access.

3. In NR1, NR2, and NR3 zones:

a. Any floor area contained in an accessory dwelling unit;

b. Either up to 500 additional square feet of floor area in any accessory structure that is not a detached accessory dwelling unit, or up to 250 square feet of floor area in an attached garage.

4. In RSL zones, 50 percent of the chargeable floor area contained in structures built prior to January 1, 1982, as single-family dwelling units that will remain in residential use, regardless of the number of dwelling units within the existing structure, provided the exemption is limited to the gross square footage in the single-family dwelling unit as of January 1, 1982.

D. In NR1, NR2, and NR3 zones, additions to a single-family dwelling unit existing on the effective date of the ordinance introduced as Council Bill 119544 may exceed the FAR limit in subsection 23.44.011.B.1 if the addition adds floor area equal to or less than 20 percent of the floor area that existed on the effective date of the ordinance introduced as Council Bill 119544. Only one addition to any single-family dwelling unit may be exempted under this subsection 23.44.011.D.

23.44.012 Height limits

A. Maximum height established. The provisions of this Section 23.44.012 apply in neighborhood residential zones, except as provided elsewhere in the Land Use Code for specific types of structures or structures in particular locations.

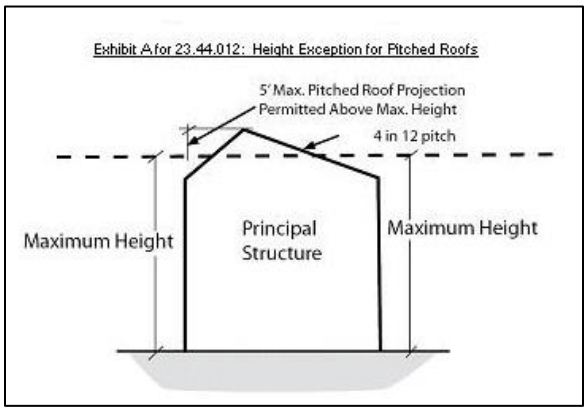
1. Except as provided in subsections 23.44.012.A.2 and 23.44.012.A.3, the maximum permitted height for any structure not located in a required yard is 30 feet.

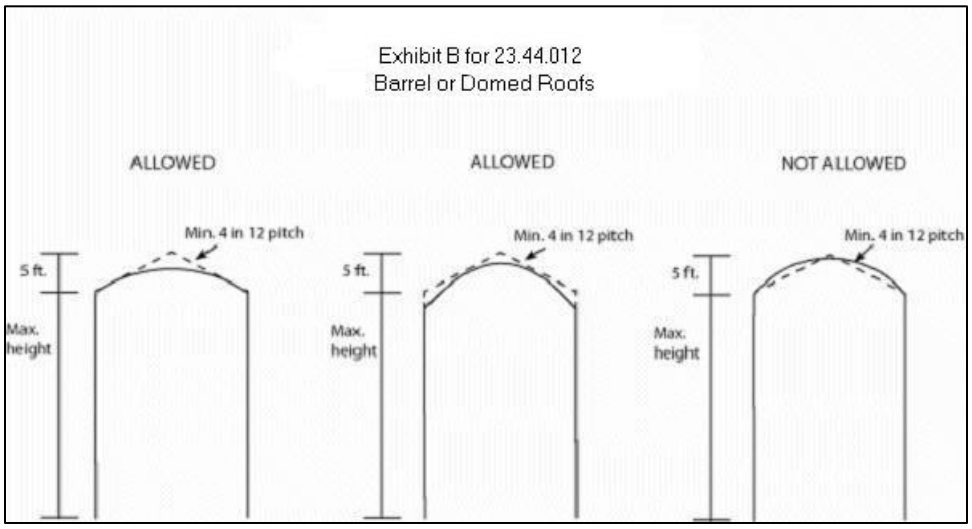
2. In NR1, NR2, and NR3 zones, the maximum permitted height for any structure on a lot 30 feet or less in width is 25 feet.

3. In NR1, NR2, and NR3 zones, for a lot or unit lot of any width, if the area of the largest rectangle or other quadrilateral that can be drawn within the lot lines of the lot or unit lot is less than 3,200 square feet the maximum permitted height for any structure on that lot shall be 18 feet. Additional height shall be allowed, subject to the limit that would otherwise apply under subsections 23.44.012.A.1 and 23.44.012.A.2, provided that the elevation at the top of the exterior walls of the structure, exclusive of pitched roofs, does not exceed the average of the elevations at the tops of the walls of single-family residences on abutting lots within the same zone. The limit of this subsection 23.44.012.A.3 shall not apply to additions to single-family residences existing as of February 1, 2013, that do not exceed the greater of 1,000 square feet of new gross floor area or the amount of gross floor area on any one floor of the existing house.

B. Pitched roofs. The ridge of a pitched roof on a principal structure may extend up to 5 feet above the maximum height limit, as determined under subsection 23.44.012.A. All parts of the roof above the height limit must be pitched at a rate of not less than 4:12 (Exhibit A for 23.44.012). No portion of a shed or butterfly roof, except on a dormer, shall be permitted to extend beyond the maximum height limit, as determined under subsection 23.44.012.A. Roof forms including but not limited to barreled and domed roofs may be allowed under this

subsection 23.44.012.B if the Director determines that the roof form remains within the massing of a pitched roof form such as a gable or gambrel roof that would otherwise be allowed by this subsection 23.44.012.B (Exhibit B for 23.44.012).





C. Height limit exemptions

1. Flagpoles. Except in the Airport Height Overlay District, Chapter 23.64, flagpoles are exempt from height limits, provided that they are no closer to any adjoining lot line than 50 percent of their height above existing grade, or, if attached only to a roof, no closer than 50 percent of their height above the roof portion where attached.

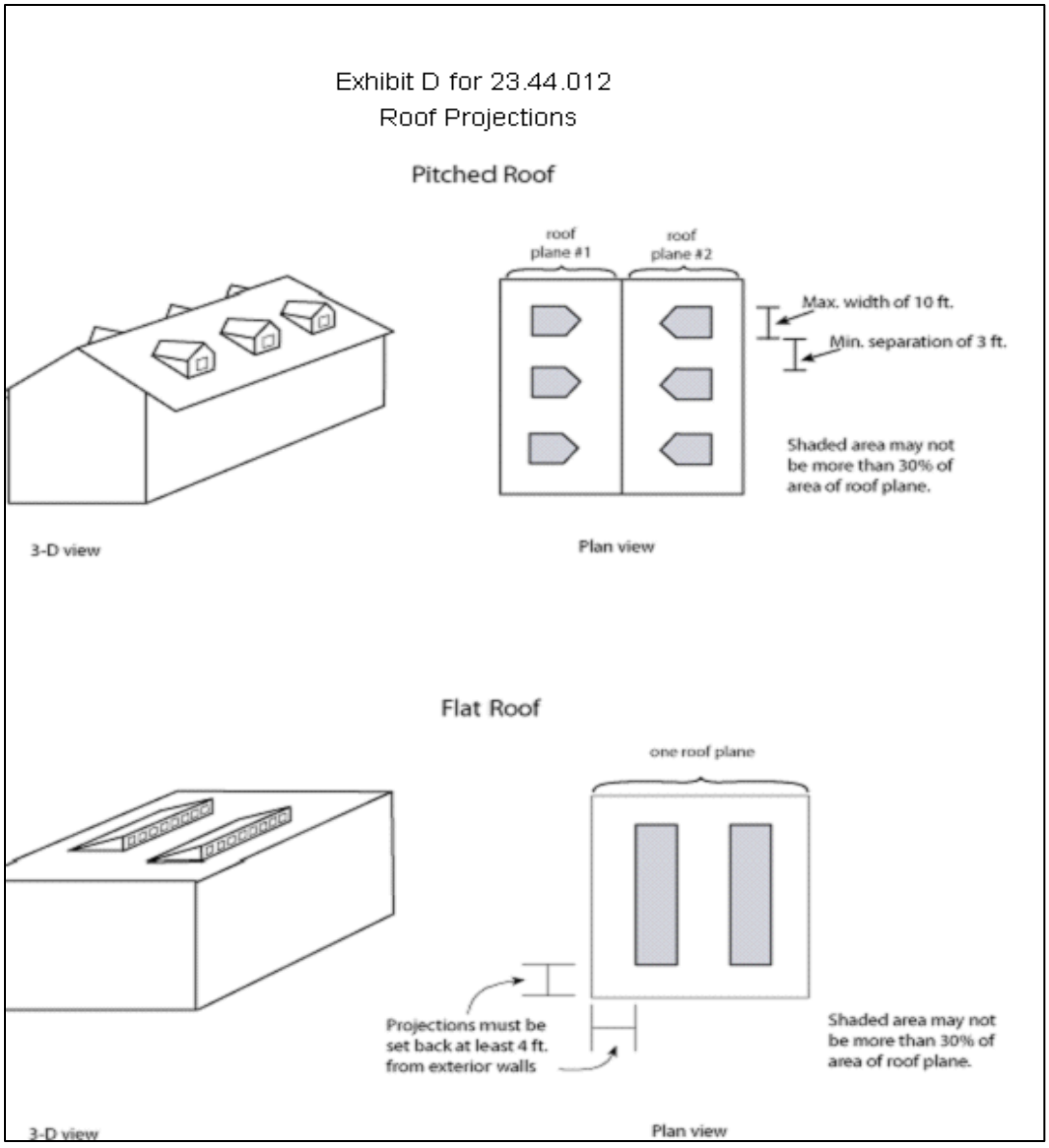
2. Other features. Open rails and planters may extend no higher than the ridge of a pitched roof permitted under subsection 23.44.012.B or 4 feet above the maximum height limit in subsection 23.44.012.A. Planters on flat roofs shall not be located within 4 feet of more than 25 percent of the perimeter of the roof. For any structure with a green roof and having a minimum rooftop coverage of 50 percent, up to 24 inches of additional height above the height limit is allowed to accommodate structural requirements, roofing membranes, and soil. Chimneys may extend 4 feet above the ridge of a pitched roof or above a flat roof.

3. Projections that accommodate windows and result in additional interior space, including dormers, clerestories, skylights, and greenhouses, may extend no higher than the ridge of a pitched roof permitted pursuant to subsection 23.44.012.B, or 4 feet above the applicable height limit pursuant to subsection 23.44.012.A, whichever is higher, if all of the following conditions are satisfied (Exhibit D for 23.44.012:

a. The total area of these projections is limited to 30 percent of the area of each roof plane measured from the plan view perspective;

b. On pitched roofs, projections are limited to 10 feet in width with a minimum separation of 3 feet from other projections; and

c. On flat roofs, projections are set back at least 4 feet from exterior walls.



4. Solar collectors. For height exceptions for solar collectors, not including solar greenhouses, see Section 23.44.046.

5. For nonresidential principal uses, the following rooftop features may extend up to 10 feet above the maximum height limit, as long as the combined total coverage of all features listed in this subsection 23.44.012.C.5 does not exceed 15 percent of the roof area or 20 percent of the roof area if the total includes screened or enclosed mechanical equipment:

a. Stair and elevator penthouses;

b. Mechanical equipment; or

c. Wind-driven power generators.

6. Wind-driven power generators. Devices for generating wind power may be located on structures as a rooftop feature and may extend up to 10 feet above the maximum height limit set in subsections 23.44.012. A and 23.44.012.B, provided that the combined total coverage of all features does not exceed 15 percent of the roof area.

7. For height limits and exceptions for communication utilities and accessory communication devices, see Section 23.57.010.

23.44.013 Transportation concurrency level-of-service standards.

Proposed uses in neighborhood residential zones shall meet the transportation concurrency level-of-service standards prescribed in Chapter 23.52.

23.44.014 Yards

A. General

1. Yards are required for every lot in a neighborhood residential zone.

2. In the case of a through lot, each yard abutting a street, except a side yard, shall be a front yard. Rear yard provisions shall not apply to the through lot, except pursuant to Section 23.40.030 or 23.40.035.

3. Setbacks from a street or alley may be required in order to meet the provisions of Section 23.53.015.

4. Setbacks from access easements may also be required for principal structures according to the standards in subsections 23.53.025.C.2 and 23.53.025.D.6.

B. Required yards for neighborhood residential zones are shown in Table A for 23.44.014.

Table A for 23.44.014 **Required yards in neighborhood residential zones**		
Yard	**NR1, NR2, and NR3**	**RSL**
Front	20 feet or the average of the front yards of the single-family structures on either side, whichever is less[1]	10 feet
Rear	25 feet or 20 percent of lot depth, whichever is less, except that it may never be less than 10 feet[2]	10 feet except that, if the rear yard abuts an alley, there is no rear yard requirement
Side	5 feet[3, 4, 5]	5 feet[5]

Footnotes to Table A for 23.44.014

[1] If the natural gradient or slope (as measured from the front line of the lot for a distance of 60 feet or the full depth of the lot, whichever is less) is in excess of 35 percent, the required front yard depth shall be the lesser of: 20 feet less 1 foot for each one percent of gradient or slope in excess of 35 percent; or the average of the front yards on either side.

[2] If the rear lot line abuts an alley, the centerline of the alley between the side lot lines extended shall be assumed to be the rear lot line for purposes of the provision of rear yard and the determination of lot depth; provided, that at no point shall the principal structure be closer than 5 feet to the alley.

[3] In the case of a reversed corner lot, the key lot of which is in a neighborhood residential zone, the width of the side yard on the street side of the reversed corner lot shall not be less than 10 feet.

[4] If any side street lot line is a continuation of the front lot line of an abutting neighborhood residential zoned lot, whether or not separated by an alley, the width of the street side yard shall not be less than 10 feet.

[5] No side yard is required from a side lot line that abuts an alley.

C. Exceptions from standard yard requirements. No structure shall be placed in a required yard except as follows:

1. Garages. Attached and detached garages may be located in a required yard subject to the standards of Section 23.44.016.

2. Certain accessory structures in side and rear yards

a. Except for detached accessory dwelling units, any accessory structure that complies with the requirements of Section 23.44.040 may be constructed in a side yard that abuts the rear or side yard of another lot, or in that portion of the rear yard of a reversed corner lot within 5 feet of the key lot and not abutting the front yard of the key lot, upon recording with

the King County Recorder's Office an agreement to this effect between the owners of record of the abutting properties.

b. Except for detached accessory dwelling units, any detached accessory structure that complies with the requirements of Section 23.44.040 may be located in a rear yard, provided that on a reversed corner lot, no accessory structure shall be located in that portion of the required rear yard that abuts the required front yard of the adjoining key lot, nor shall the accessory structure be located closer than 5 feet from the key lot's side lot line unless the provisions of subsections 23.44.014.C.2.a or 23.44.016.D.9 apply.

3. A principal structure with or without an accessory dwelling unit, and/or a detached accessory dwelling unit may extend into one side yard if an easement is provided along the side or rear lot line of the abutting lot, sufficient to leave a 10-foot separation between that structure and any principal structure or detached accessory dwelling unit on the abutting lot. The 10-foot separation shall be measured from the wall of the structure proposed to extend into a side yard to the wall of the structure on the abutting lot.

a. No structure or portion of a structure may be built on either lot within the 10-foot separation, except as provided in this Section 23.44.014.

b. Features of and projections from structures, such as porches, eaves, and chimneys, are permitted in the 10-foot separation area required by this subsection 23.44.014.C.3 if otherwise allowed in side yards by this subsection 23.44.014.C. For purposes of calculating the distance a structure or feature may project into the 10-foot separation, assume the property line is 5 feet from the wall of the structure proposed to extend into a side yard and consider the 5 feet between the wall and the assumed property line to be the required side yard.

c. Notwithstanding subsection 23.44.014.C.3.b, no portion of any structure, including eaves or any other projection, shall cross the actual property line.

d. The easement shall be recorded with the King County Recorder's Office. The easement shall provide access for normal maintenance activities to the structures on the lot with less than the required 5-foot side yard.

4. Certain additions to structures may be permitted. An existing single-family structure may extend into a required yard if the existing structure is already nonconforming with respect to that yard. The presently nonconforming portion must be at least 60 percent of the total width of the respective facade of the structure prior to the addition. The line formed by the existing nonconforming wall of the structure is the limit to which any additions may be built, except as described in subsections 23.44.014.C.4.a through 23.44.014.C.4.e. Additions may extend up to the height limit and may include basement additions. New additions to the nonconforming wall or walls within required yards shall comply with the following requirements:

a. Side yard. If the addition is a side wall, the existing wall line may be continued by the addition except that in no case shall the addition be closer than 3 feet to the side lot line;

b. Rear yard. If the addition is a rear wall, the existing wall line may be continued by the addition except that in no case shall the addition be closer than 20 feet to the rear lot line or centerline of an alley abutting the rear lot line;

c. Front yard. If the addition is a front wall, the existing wall line may be continued by the addition except that in no case shall the addition be closer than 15 feet to the front lot line;

d. If the nonconforming wall of the structure is not parallel or is otherwise irregular, relative to the lot line, then the Director shall determine the limit of the wall extension, except that the wall extension shall not be located closer than specified in subsections 23.44.014.C.4.a, 23.44.014.C.4.b, and 23.44.014.C.4.c.

e. Roof eaves, gutters, and chimneys on such additions may extend an additional 18 inches into a required yard, but in no case shall such features be closer than 2 feet to the side lot line.

5. Uncovered porches or steps. Uncovered, unenclosed porches or steps may project into any required yard, if the surface of porches or steps are no higher than 4 feet above existing grade, no closer than 3 feet to any side lot line, and has a width and depth no greater than 6 feet within the required yard. For each entry to a structure, one uncovered, unenclosed porch and/or associated steps are permitted in each required yard.

6. Certain features of a structure. Unless otherwise provided elsewhere in this Chapter 23.44 or Section 23.42.022, certain features of a principal or accessory structure may extend into required yards if they comply with the following:

a. External architectural details with no living area, such as chimneys, eaves, cornices, and columns, may project no more than 18 inches into any required yard;

b. Bay windows are limited to 8 feet in width and may project no more than 2 feet into a required front, rear, and street side yard;

c. Other projections that include interior space, such as garden windows, may extend no more than 18 inches into any required yard, starting a minimum of 30 inches above finished floor, and with maximum dimensions of 6 feet in height and 8 feet in width;

d. The combined area of features permitted by subsections 23.44.014.C.6.b and 23.44.014.C.6.c may comprise no more than 30 percent of the area of the facade, except that no limit applies to detached accessory dwelling units.

7. Covered, unenclosed decks and roofs over patios. Covered, unenclosed decks and roofs over patios, if attached to a principal structure, may extend into the required rear yard, but shall not be within 12 feet of the centerline of any alley, or within 5 feet of any rear lot line that is not an alley lot line, or closer to any side lot line in the required rear yard than the side yard requirement of the principal structure along that side, or closer than 5 feet to any accessory structure. The height of the roof over unenclosed decks and patios shall not exceed 12 feet above existing or finished grade, whichever is lower. The roof over such decks or patios shall not be used as a deck.

8. Access bridges. Uncovered, unenclosed access bridges are permitted as follows:

a. Pedestrian bridges 5 feet or less in width, and of any height necessary for access, are permitted in required yards, except that in side yards an access bridge must be at least 3 feet from any side lot line.

b. A driveway access bridge is permitted in the required yard abutting the street if necessary for access to parking. The vehicular access bridge shall be no wider than 12 feet for access to one parking space or 18 feet for access to two or more parking spaces and of any height necessary for access. The driveway access bridge may not be located closer than 5 feet to an adjacent property line.

9. Barrier-free access. Access facilities for the disabled and elderly that comply with the Seattle Building Code, Chapter 11, are permitted in any required yard.

10. Freestanding structures and bulkheads

a. Fences, freestanding walls, bulkheads, signs, and similar structures 6 feet or less in height above existing or finished grade, whichever is lower, may be erected in any required yard. The 6-foot height may be averaged along sloping grade for each 6-foot-long segment of the fence, but in no case may any portion of the fence exceed 8 feet. Architectural features may be added to the top of the fence or freestanding wall above the 6-foot height if the features comply with the following: horizontal architectural feature(s), no more than 10 inches high, and separated by a minimum of 6 inches of open area, measured vertically from the top of the fence, are permitted if the overall height of all parts of the structure, including post caps, is no more than 8 feet. Averaging the 8-foot height is not permitted. Structural supports for the horizontal architectural feature(s) may be spaced no closer than 3 feet on center.

b. The Director may allow variation from the development standards listed in subsection 23.44.014.C.10.a, according to the following:

1) No part of the structure may exceed 8 feet; and

2) Any portion of the structure above 6 feet shall be predominately open, such that there is free circulation of light and air.

c. Bulkheads and retaining walls used to raise grade may be placed in any required yard when limited to 6 feet in height, measured above existing grade. A guardrail no higher than 42 inches may be placed on top of a bulkhead or retaining wall existing as of February 20, 1982. If a fence is placed on top of a new bulkhead or retaining wall, the maximum combined height is limited to 9 1/2 feet.

d. Bulkheads and retaining walls used to protect a cut into existing grade may be placed in any required yard when limited to the minimum height necessary to support the

cut. If the bulkhead or retaining wall is measured from the low side and it exceeds 6 feet, an open guardrail of no more than 42 inches meeting Seattle Building Code requirements may be placed on top of the bulkhead or retaining wall. If the bulkhead or retaining wall is 6 feet or less, a fence may be placed on top up to a maximum combined height of 9.5 feet for both fence and bulkhead or retaining wall.

e. If located in shoreline setbacks or in view corridors in the Shoreline District as regulated in Chapter 23.60A, structures shall not obscure views protected by Chapter 23.60A, and the Director shall determine the permitted height.

11. Decks in yards. Except for decks attached to a detached accessory dwelling unit, decks no higher than 18 inches above existing or finished grade, whichever is lower, may extend into required yards.

12. Mechanical equipment. Heat pumps and similar mechanical equipment, not including incinerators, are permitted in required yards if they comply with the requirements of Chapter 25.08. Any heat pump or similar equipment shall not be located within 3 feet of any lot line. Charging devices for electric cars are considered mechanical equipment and are permitted in required yards if not located within 3 feet of any lot line.

13. Solar collectors. Solar collectors may be located in required yards, subject to the provisions of Section 23.44.046.

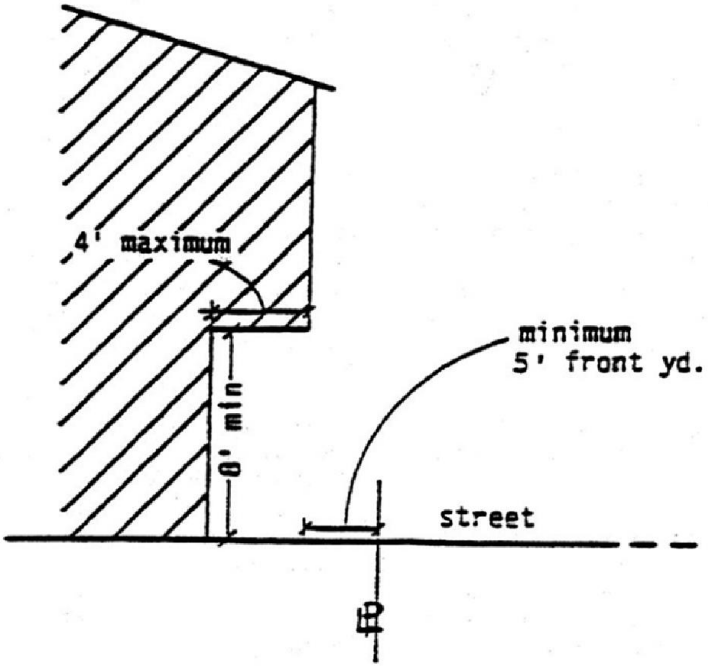
14. Front yard projections for structures on lots 30 feet or less in width. For a structure on a lot in an NR1, NR2, and NR3 zone that is 30 feet or less in width, portions of the front facade that begin 8 feet or more above finished grade may project up to 4 feet into the required front yard, provided that no portion of the facade, including eaves and gutters, shall be closer than 5 feet to the front lot line (Exhibit A for 23.44.014), and provided further that no

portion of the facade of an existing structure that is less than 8 feet or more above finished grade already projects into the required front yard.

Exhibit A for 23.44.014

Front yard projections permitted for structures on lots 30 feet or less in width

Exhibit A for 23.44.014
Front yard projections permitted for structures on lots 30 feet or less in width



15. Front and rear yards may be reduced by 25 percent, but no more than 5 feet, if the site contains a required environmentally critical area buffer or other area of the property that cannot be disturbed pursuant to subsection 25.09.280.A.

16. Arbors. Arbors may be permitted in required yards under the following conditions:

a. In any required yard, an arbor may be erected with no more than a 40-square-foot footprint, measured on a horizontal roof plane inclusive of eaves, to a maximum height of 8 feet. Both the sides and the roof of the arbor shall be at least 50 percent open, or if latticework is used, there shall be a minimum opening of 2 inches between crosspieces.

b. In each required yard abutting a street, an arbor over a private pedestrian walkway with no more than a 30-square-foot footprint, measured on the horizontal roof plane and inclusive of eaves, may be erected to a maximum height of 8 feet. The sides of the arbor shall be at least 50 percent open, or if latticework is used, there shall be a minimum opening of 2 inches between crosspieces.

17. Stormwater management

a. Above-grade green stormwater infrastructure (GSI) features are allowed without yard restrictions if:

1) Each above-grade GSI feature is no more than 4.5 feet tall, excluding piping;

2) Each above-grade GSI feature is no more than 4 feet wide; and

3) The total storage capacity of all above-grade GSI features is no greater than 600 gallons.

b. Above-grade GSI features larger than what is allowed in subsection 23.44.014.C.17.a are allowed within a required yard if:

1) Above-grade GSI features do not exceed ten percent coverage of any one yard area;

2) No portion of an above-grade GSI feature is located closer than 3 feet from a side lot line;

3) No portion of an above-grade GSI feature is located closer than 20 feet from a rear lot line or centerline of an alley abutting the rear lot line; and

4) No portion of an above-grade GSI feature is located closer than 15 feet from the front lot line.

18. A structure may be permitted to extend into front and rear yards as necessary to protect a Tier 1 or Tier 2 tree, as defined in Section 25.11.130.

19. Below grade structures. Structures below grade, measured from existing or finished grade, whichever is lower, may be located below required yards.

D. Additional standards for structures if allowed in required yards. Structures in required yards shall comply with the following:

1. Accessory structures, attached garages, and portions of a principal structure shall not exceed a maximum combined coverage of 40 percent of the required rear yard, except that, when a detached accessory structure is proposed, the structures may cover an additional 20 percent of the rear yard provided that the increased rear yard coverage does not require removal of any Tier 1 or Tier 2 tree. In the case of a rear yard abutting an alley, rear yard coverage shall be calculated from the centerline of the alley.

2. Any accessory structure located in a required yard shall be separated from its principal structure by a minimum of 5 feet. This requirement does not apply to terraced garages that comply with subsection 23.44.016.C.9.b.

3. Except for detached accessory dwelling units, any accessory structure located in a required yard shall meet both the following standards:

a. A maximum height of 12 feet; and

b. A maximum size of 1,000 square feet in area.

4. Any detached accessory dwelling unit located in a required yard is subject to the requirements of Section 23.42.022.

E. Separations between multiple structures in RSL zones

1. In RSL zones, the minimum required separation between principal structures is 10 feet, except for principal structures separated by a driveway or parking aisle.

2. If principal structures are separated by a driveway or parking aisle, the minimum required separation between the principal structures is 2 feet greater than the required width of the driveway or parking aisle, provided that the separation is not required to be any greater than 24 feet. If principal structures are separated by a driveway or parking aisle, projections that enclose floor area may extend a maximum of 3 feet into the required separation if they are at least 8 feet above finished grade.

3. Uncovered porches or steps, features of a structure listed in subsection 23.44.014.C.6, and decks shall be allowed in the separation between principal structures provided they:

a. Comply with the standards of subsections 23.44.014.C.5, 23.44.014.C.6, and 23.44.014.C.11 if the separation were treated like a yard; and

b. Project no more than 3 feet into the separation area.

4. Fences shall be allowed in the separation between principal structures provided they meet the development standards in subsection 23.44.014.C.10.

23.44.016 Parking and garages

A. Parking quantity. Off-street parking is required pursuant to Section 23.54.015.

B. Access to parking

1. Vehicular access to parking from an improved street, alley, or easement is required if parking is required pursuant to Section 23.54.015.

2. Access to parking is permitted through a required yard abutting a street only if the Director determines that one of the following conditions exists:

a. There is no alley improved to the standards of subsection 23.53.030.C, and there is no unimproved alley in common usage that currently provides access to parking on the lot or to parking on adjacent lots in the same block; or

b. Existing topography does not permit alley access; or

c. At least 50 percent of alley frontage abuts property in a non-residential zone; or

d. The alley is used for loading or unloading by an existing non-residential use; or

e. Due to the relationship of the alley to the street system, use of the alley for parking access would create a significant safety hazard; or

f. Parking access must be from the street in order to provide access to a parking space that complies with the Seattle Building Code, Chapter 11; or

g. Providing alley access would require removal of a tree on private property that is a Tier 1 or Tier 2 tree, as defined in Section 25.11.130.

C. Location of parking

1. Parking shall be located on the same lot as the principal use, except as provided in this subsection 23.44.016.C.

2. Parking on planting strips is prohibited.

3. For lots developed with one single-family dwelling, no more than three vehicles may be parked outdoors on any lot.

4. Parking accessory to a floating home may be located on another lot if within 600 feet of the lot on which the floating home is located. The accessory parking shall be screened and landscaped according to subsection 23.44.016.G.

5. Parking accessory to a single-family structure existing on June 11, 1982, may be established on another lot if all the following conditions are met:

a. There is no vehicular access to permissible parking areas on the lot.

b. Any garage constructed is for no more than two two-axle, or two up to four-wheeled vehicles.

c. Parking is screened or landscaped as required by the Director, who shall consider development patterns of the block or nearby blocks.

d. The lot providing the parking is within the same block or across the alley from the principal use lot.

e. The accessory parking shall be tied to the lot of the principal use by a covenant or other document recorded with the King County Recorder's Office.

D. Parking and garages in required yards. Parking and garages are regulated as described in this subsection 23.44.016.D. Unless otherwise specified, the terms "garage" or "garages" as used in this subsection 23.44.016.D refer to both attached and detached garages.

1. Parking and garages shall not be located in the required front yard except as provided in subsections 23.44.016.D.6, 23.44.016.D.8, 23.44.016.D.9, 23.44.016.D.10, and 23.44.016.D.11.

2. Parking and garages shall not be located in a required side yard abutting a street or the first 10 feet of a required rear yard abutting a street except as provided in subsections 23.44.016.D.6, 23.44.016.D.8, 23.44.016.D.9, 23.44.016.D.10, and 23.44.016.D.11.

3. Garages shall not be located in a required side yard that abuts the rear or side yard of another lot or in that portion of the rear yard of a reversed corner lot within 5 feet of the key lot's side lot line unless:

a. The garage is a detached garage and extends only into that portion of a side yard that is either within 35 feet of the centerline of an alley or within 25 feet of any rear lot line that is not an alley lot line; or

b. An agreement between the owners of record of the abutting properties, authorizing the garage in that location, is executed and recorded, pursuant to subsection 23.44.014.C.2.a.

4. Garages with vehicular access facing an alley, shall not be located within 12 feet of the centerline of any alley, nor within 12 feet of any rear lot line that is not an alley lot line, except as provided in subsections 23.44.016.D.8, 23.44.016.D.9, 23.44.016.D.10, and 23.44.016.D.11, or the Director may waive or modify this standard as a Type I decision provided the applicant can demonstrate that adequate turning and maneuvering areas can be provided.

5. On a reversed corner lot, no garage shall be located in that portion of the required rear yard that abuts the required front yard of the adjoining key lot unless the provisions of subsection 23.44.016.D.8 apply.

6. If access to required parking passes through a required yard, automobiles, motorcycles, and similar vehicles may be parked on the open access located in a required yard.

7. Trailers, boats, recreational vehicles, and similar equipment shall not be parked in required front and side yards or the first 10 feet of a rear yard measured from the rear lot line, or measured 10 feet from the centerline of an alley if there is an alley adjacent to the rear lot line, unless fully enclosed in a structure otherwise allowed in a required yard by this subsection 23.44.016.D.

8. Lots with uphill yards abutting streets. In NR1, NR2, and NR3 zones, parking for one two-axle or one up to four-wheeled vehicle may be established in a required yard abutting a street according to subsection 23.44.016.D.8.a or 23.44.016.D.8.b only if access to parking is permitted through that yard pursuant to subsection 23.44.016.B.

a. Open parking space

1) The existing grade of the lot slopes upward from the street lot line an average of at least 6 feet above sidewalk grade at a line that is 10 feet from the street lot line; and

2) The parking area shall be at least an average of 6 feet below the existing grade prior to excavation and/or construction at a line that is 10 feet from the street lot line; and

3) The parking space shall be no wider than 10 feet for one parking space at the parking surface and no wider than 20 feet for two parking spaces if permitted as provided in subsection 23.44.016.D.11.

b. Terraced garage

1) The height of a terraced garage is limited to no more than 2 feet above existing or finished grade, whichever is lower, for the portions of the garage that are 10 feet or more from the street lot line. The ridge of a pitched roof on a terraced garage may extend up to 3 feet above this 2-foot height limit. All parts of the roof above the 2-foot height limit shall be pitched at a rate of not less than 4:12. No portion of a shed roof shall be permitted to extend beyond the 2-foot height limit of this provision. Portions of a terraced garage that are less than 10 feet from the street lot line shall comply with the height standards in subsection 23.44.016.E.2;

2) The width of a terraced garage structure shall not exceed 14 feet for one two-axle or one up to four-wheeled vehicle, or 24 feet if permitted to have two two-axle or two up to four-wheeled vehicles as provided in subsection 23.44.016.D.11;

3) All above ground portions of the terraced garage shall be included in lot coverage; and

4) The roof of the terraced garage may be used as a deck and shall be considered to be a part of the garage structure even if it is a separate structure on top of the garage.

9. Lots with downhill yards abutting streets. In NR1, NR2, and NR3 zones, parking, either open or enclosed in an attached or detached garage, for one two-axle or one up to four-wheeled vehicle may be located in a required yard abutting a street if the following conditions are met:

a. The existing grade slopes downward from the street lot line that the parking faces;

b. For front yard parking, the lot has a vertical drop of at least 20 feet in the first 60 feet, measured along a line from the midpoint of the front lot line to the midpoint of the rear lot line;

c. Parking is not permitted in required side yards abutting a street;

d. Parking in a rear yard complies with subsections 23.44.016.D.2, 23.44.016.D.4 and 23.44.016.D.5; and

e. Access to parking is permitted through the required yard abutting the street by subsection 23.44.016.B.

10. Through lots. On through lots less than 125 feet in depth in NR1, NR2, and NR3 zones, parking, either open or enclosed in an attached or detached garage, for one two-axle or one up to four-wheeled vehicle may be located in one of the required front yards. The front yard in which the parking may be located shall be determined by the Director based on the location of other garages or parking areas on the block. If no pattern of parking location can be determined, the Director shall determine in which yard the parking shall be located based on the prevailing character and setback patterns of the block.

11. Lots with uphill yards abutting streets or downhill or through lot front yards fronting on streets that prohibit parking. In NR1, NR2, and NR3 zones, parking for two two-axle or two up to four-wheeled vehicles may be located in uphill yards abutting streets or downhill or through lot front yards as provided in subsections 23.44.016.D.8, 23.44.016.D.9, or 23.44.016.D.10 if, in consultation with the Seattle Department of Transportation, it is found that uninterrupted parking for 24 hours is prohibited on at least one side of the street within 200 feet

of the lot line over which access is proposed. The Director may authorize a curb cut wider than would be permitted under Section 23.54.030 if necessary, for access.

E. Standards for garages if allowed in required yards. Garages that are either detached structures or portions of a principal structure for the primary purpose of enclosing a two-axle or four-wheeled vehicle may be permitted in required yards according to the following conditions:

1. Maximum coverage and size

a. Garages, together with any other accessory structures and other portions of the principal structure, are limited to a maximum combined coverage of 40 percent of the required rear yard. In the case of a rear yard abutting an alley, rear yard coverage shall be calculated from the centerline of the alley.

b. Garages located in side or rear yards shall not exceed 1,000 square feet in area.

c. In front yards, the area of garages is limited to 300 square feet with 14-foot maximum width if one space is provided, and 600 square feet with 24-foot maximum width if two spaces are provided. Access driveway bridges permitted under subsection 23.44.014.C.8.b shall not be included in this calculation.

2. Height limits

a. Garages are limited to 12 feet in height measured on the facade containing the entrance for the vehicle.

b. The ridge of a pitched roof on a garage located in a required yard may extend up to 3 feet above the 12-foot height limit. All parts of the roof above the height limit shall be pitched at a rate of not less than 4:12. No portion of a shed roof is permitted to extend beyond the 12-foot height limit.

c. Open rails around balconies or decks located on the roofs of garages may exceed the 12-foot height limit by a maximum of 3 feet. The roof over a garage shall not be used as a balcony or deck in rear yards.

3. Separations. Any detached garage located in a required yard, including projecting eaves and gutters, shall be separated from a principal structure by a minimum of 5 feet including eaves and gutters of all structures. This requirement does not apply to terraced garages that comply with subsection 23.44.016.D.9.b.

4. Roof eaves and gutters of a garage located in a required yard may extend a maximum of 18 inches from the exterior wall of the garage. Such roof eaves and gutters are excluded from the maximum coverage and size limits of subsection 23.44.016.E.1.

5. Except for terraced garages that comply with subsection 23.44.016.D.9.b, the roof over a garage in a rear yard shall not be used as a balcony or deck.

F. Appearance of garages

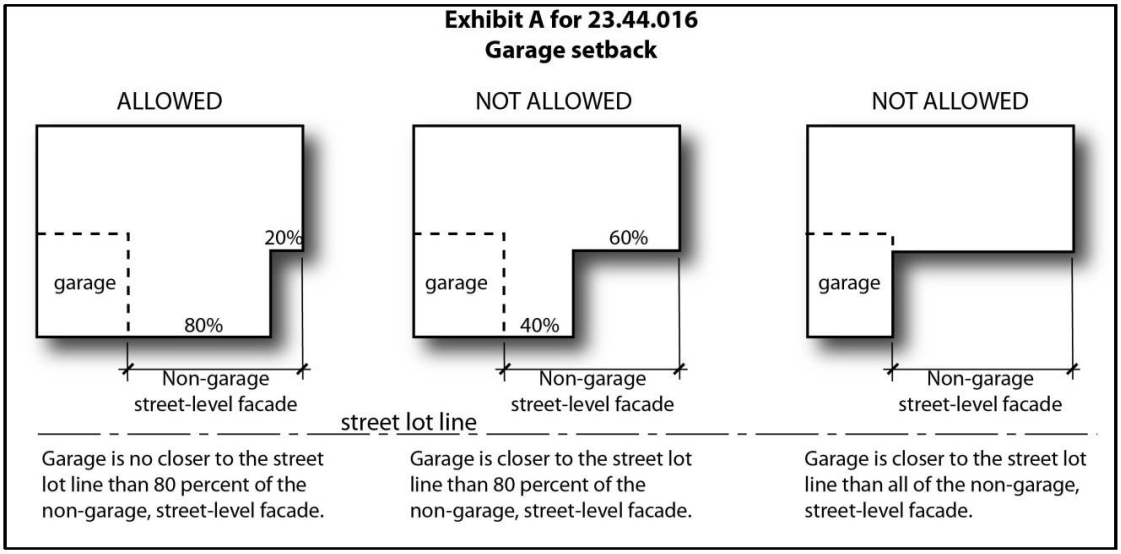
1. Garage setback.

a. In NR1, NR2, and NR3 zones, no portion of a garage, whether attached to a principal structure or within a detached accessory structure, may be closer to the street lot line than 80 percent of the remaining non-garage, street-level facade (see Exhibit A for 23.44.016) of the principal structure to which the garage is accessory. If the entire street-level facade of either a principal or accessory structure is garage, no portion of the garage may be closer to the street lot line than 80 percent of the facade of the story above the street-level facade.

b. In RSL zones, garage entrances facing the street shall be set back at least 18 feet from the street lot line.

Exhibit A for 23.44.016

Garage setback



2. Garage entrance width. The total combined horizontal width of all garage entrances on the lot that are located on the front facade may be up to 50 percent of the horizontal width of the front facade or 10 feet, whichever is greater. On corner lots, a garage entrance shall be allowed on only one street-facing facade.

3. Exemptions

a. Garages allowed under subsections 23.44.016.D.9, 23.44.016.D.10, 23.44.016.D.11, and 23.44.016.D.12 are not subject to the standards of this subsection 23.44.016.F.

b. Garages that are set back more than 35 feet from the front lot line are not subject to the standards of this subsection 23.44.016.F.

c. The Director may waive or modify the standards of this subsection 23.44.016.F based on one or more of the following factors:

1) Irregular lot shape;

2) Topography of the lot;

3) Configuration of proposed or existing structures on the lot;

4) Location of Tier 1 or Tier 2 trees as defined in Section 25.11.130; and

5) The proposed structure or addition has design features including but not limited to modulation, screening, and landscaping.

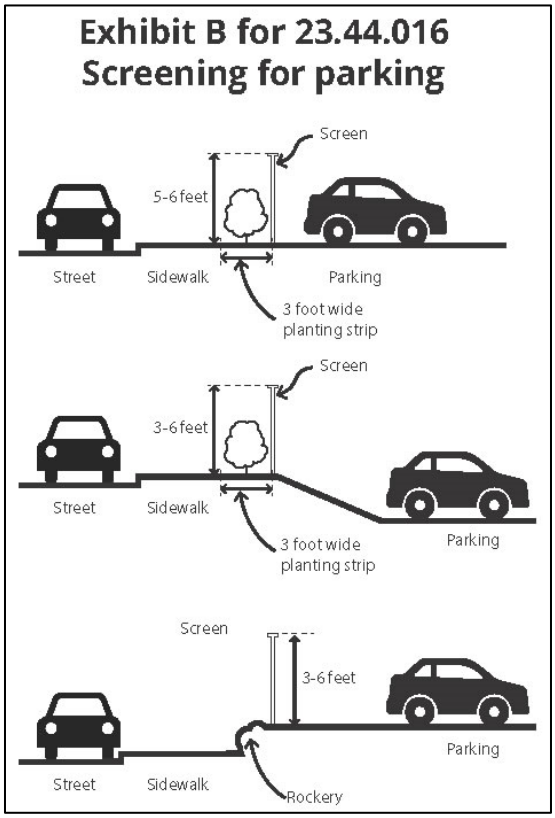
G. Screening

1. Parking accessory to floating homes when located on a separate lot from the floating homes shall be screened from direct street view by a fence or wall between 5 and 6 feet in height. When the fence or wall runs along the street front, there shall be a landscaped strip on the street side of the fence or wall. This strip may be between 1 and 5 feet deep, as measured from the property line, but the average distance from the property line to the fence shall be 3 feet. Such screening shall be located outside any required sight triangle.

2. The height of the visual barrier created by the screen required by subsection 23.44.016.G.1 shall be measured from street level. If the elevation of the lot line is different from the finished elevation of the parking surface, the difference in elevation may be measured as a portion of the required height of the screen, so long as the screen itself is a minimum of 3 feet in height (see Exhibit B for 23.44.016).

Exhibit B for 23.44.016

Screening of parking



23.44.017 Density limits

A. In NR1, NR2, and NR3 zones, only one single-family dwelling unit is allowed per lot, except that accessory dwelling units may also be approved pursuant to Section 23.42.022, and except as approved as part of an administrative conditional use permit under Section 25.09.260, a clustered housing planned development under Section 23.44.024, or a planned residential development under Section 23.44.034.

B. The following provisions apply in RSL zones:

1. The minimum lot area per principal dwelling unit is 2,000 square feet.

2. Except as provided in subsection 23.44.017.B.3, when calculation of the number of principal dwelling units allowed according to subsection 23.44.017.B.1 results in a fraction of a unit, any fraction up to and including 0.85 constitutes zero additional principal dwelling units, and any fraction over 0.85 constitutes one additional principal dwelling unit.

3. For lots in existence on April 19, 2019, if the number of principal dwelling units allowed according to subsection 23.44.017.B.1 equals less than two, two units are allowed.

4. Accessory dwelling units are allowed pursuant to Section 23.42.022.

23.44.018 Maximum dwelling unit size in RSL zones

The maximum net unit area of any dwelling unit in RSL zones, including any floor area in an accessory dwelling unit, is 2,200 square feet, except as provided in subsection 23.44.018.B.

A. The following floor area is exempt from the maximum net unit area limit:

1. All stories, or portions of stories, that are underground.

2. All portions of a story that extend no more than 4 feet above existing or finished grade, whichever is lower, excluding access.

B. Certain additions

1. The limit of this Section 23.44.018 shall not apply to an addition to single-family residences existing on April 19, 2019, if the addition:

a. Adds floor area equal to or less than 20 percent of the floor area that existed on April 19, 2019; or

b. Adds floor area only by adding or expanding a second-story, provided that the second-story addition is directly above a portion of the dwelling unit that existed prior to April 19, 2019. For purposes of this subsection 23.44.018.B.1, portions of a story that extend no

more than 4 feet above existing or finished grade, whichever is lower, shall not be considered in the calculation of the number of stories.

2. Only one addition to any single-family residence may be exempted under this subsection 23.44.018.B.

23.44.019 Alternative standards for development of affordable units on property owned or controlled by a religious organization

In lieu of meeting development standards contained in subsection 23.44.010.A (minimum lot area), subsection 23.44.010.C (maximum lot coverage), subsection 23.44.011.B (floor area), subsection 23.44.012.A (height), and Section 23.44.017 (density), a proposed development that meets the requirements of Section 23.42.055 and subsection 23.44.019.A may elect to meet the alternative development standards in subsection 23.44.019.B through subsection 23.44.019.F.

A. Lot requirements

1. Development on a lot that meets one of the following criteria, but does not meet the additional requirements in subsection 23.44.019.A.2, may meet the alternative development standards in subsection 23.44.019.B and subsection 23.44.019.D through subsection 23.44.019.F:

a. The lot has or abuts a lot with a religious facility or other use accessory to a religious facility; or

b. The lot area is 10,000 square feet or greater; or

c. The lot is in an RSL zone.

2. Development on a lot that meets the following additional requirements may meet the alternative development standards in subsection 23.44.019.C and subsection 23.44.019.D through subsection 23.44.019.F:

a. The lot area is 10,000 square feet or greater;

b. The lot is in an urban village, within 1/4 mile (1,320 feet) of an urban village, or within 1/4 mile (1,320 feet) of a transit stop or station served by a frequent transit route on the map required by subsection 23.54.015.B.4; and

c. The lot meets one of the following locational criteria:

1) The lot abuts, is located on a block front with, or is located across a right-of-way from a zone not designated a neighborhood residential zone; or

2) No lot line is located within 50 feet of a single-family dwelling unit.

B. Proposed development on lots meeting the criteria in subsection 23.44.019.A.1 but not subsection 23.44.019.A.2 may meet the following development standards:

1. The minimum lot area per dwelling unit is 1,500 square feet in NR1, NR2, and NR3 zones and 1,200 square feet in RSL zones.

2. The maximum lot coverage is 50 percent of lot area in NR1, NR2, and NR3 zones and 65 percent in RSL zones.

3. The maximum FAR limit is 1.0 in NR1, NR2, and NR3 zones and 1.2 in RSL zones. The applicable FAR limit applies to the total chargeable floor area of all structures on the lot.

4. In NR1, NR2, and NR3 zones, the maximum height for a proposed development that exceeds the maximum lot coverage limit in subsection 23.44.010.C is 22 feet. The maximum height for all other developments is 30 feet.

C. Proposed development on lots meeting the criteria in subsection 23.44.019.A.2 may meet the following development standards:

1. The minimum lot area per dwelling unit is 400 square feet.

2. The maximum lot coverage is 50 percent of lot area in NR1, NR2, and NR3 zones and 65 percent in RSL zones.

3. The maximum height limit is 40 feet in NR1, NR2, and NR3 zones and 50 feet in RSL zones.

4. The maximum FAR limit is 2.0 in NR1, NR2, and NR3 zones and 3.0 in RSL zones. The applicable FAR limit applies to the total chargeable floor area of all structures on the lot.

D. Permitted uses. In addition to the uses listed in Section 23.44.006, the following uses are permitted outright on lots meeting the requirements of this Section 23.44.019: apartments, cottage housing development, rowhouse development, and townhouse development.

E. Setback requirements. In addition to the yard requirements of Section 23.44.014, the following standards apply:

1. No structure shall be closer than 10 feet to a side lot line of an abutting neighborhood residential-zoned lot.

2. No structure shall be closer than 20 feet to a rear lot line of an abutting neighborhood residential-zoned lot.

3. No structure shall be closer than 5 feet to any lot line.

F. Maximum facade length. The maximum combined length of all portions of a facade within 20 feet of a lot line of an abutting neighborhood residential-zoned lot may not exceed 40 feet. Maximum facade length shall be measured as described in Section 23.86.015.

23.44.020 Tree requirements

A. Tree requirements in NR1, NR2, and NR3 zones

1. Trees sufficient to meet the following requirements shall be provided when single-family dwelling units are constructed:

a. For lots over 3,000 square feet, at least 2 caliper inches of tree per 1,000 square feet of lot area.

b. On lots that are 3,000 square feet or smaller, at least 3 caliper inches of tree.

2. Trees sufficient to meet the following requirements shall be provided when a new structure, or an addition to an existing structure, containing an accessory dwelling unit is constructed:

a. For lots that do not contain the minimum number of caliper inches of tree required by subsection 23.44.020.A.1 at the time a permit application is submitted for any number of accessory dwelling units, at least 2 caliper inches of tree shall be planted;

b. For lots that contain the minimum number of caliper inches of tree required by subsection 23.44.020.A.1 at the time a permit application is submitted for any number of accessory dwelling units, no new trees are required.

3. The minimum number of caliper inches of tree required may be met by preserving existing trees, planting new trees, or by a combination of preservation and planting. The preservation or planting of trees in the right-of-way may be counted, provided that they are approved by the Director of Transportation.

4. Submerged land shall not be included in calculating lot area for purposes of either the tree preservation option or tree planting option.

5. Tree measurements. Trees planted to meet the requirements in this subsection 23.44.020.A shall be at least 1.5 inches in diameter. The diameter of new trees shall be measured

(in caliper inches) 6 inches above the ground. Existing trees shall be measured 4.5 feet above the ground. When an existing tree is 3 to 10 inches in diameter, each 1 inch counts as 1 inch toward meeting the tree requirements in this subsection 23.44.020.A. When an existing tree is more than 10 inches in diameter, each 1 inch of the tree that is over 10 inches shall count as 3 inches toward meeting the tree requirement.

6. Tree preservation plans. If the tree preservation option is chosen, a tree preservation plan must be submitted by a certified arborist and approved. Tree preservation plans shall provide for protection of trees during construction according to standards promulgated by the Director.

7. The owner of the subject lot shall ensure that the trees planted remain healthy for at least five years after inspection by the City and be responsible for replacing any trees that do not remain healthy after inspection by the City.

B. Tree requirements in RSL zones

1. Trees sufficient to achieve one point, according to Table A for 23.44.020, per 500 square feet of lot area shall be provided for any development:

a. Containing one or more new dwelling units;

b. Containing more than 4,000 square feet of non-residential uses in either a new structure or an addition to an existing structure; or

c. Expanding surface area parking by more than 20 parking spaces for automobiles.

2. Individual trees preserved during construction or planted after construction, excluding street trees, count toward the tree score according to Table A for 23.44.020. All required trees shall meet standards promulgated by the Director to provide for the long-term

health, viability, and coverage of plantings. These standards may include, but are not limited to, the type and size of plants, spacing of plants, depth, and quality of soil, access to light and air, and protection practices during construction.

Table A for 23.44.020 Tree points		
Type of tree	**Points for deciduous trees**	**Points for evergreen trees**
Small tree planted after construction	1 point	1.25 point
Small/medium tree planted after construction	2 points	2.5 points
Medium/large tree planted after construction	3 points	3.75 points
Large tree planted after construction	4 points	5 points
Trees 6 inches in diameter or greater that are preserved during construction	1 point per inch of diameter	1.25 point per inch of diameter

3. Tree protection areas shall be designated for all trees that are proposed to be preserved to receive points under this subsection 23.44.020.B. No excavation, fill, placing of materials or equipment, or vehicle operation shall be allowed during construction within a tree protection area. Tree protection areas shall be an area equal to the outer extent of the dripline of the tree, except that they may be reduced if the following conditions are met:

a. A certified arborist has submitted and received approval for a plan providing the rationale used to demonstrate that the alternate method provides an adequate level of protection based on visiting the site and examining the specific tree's size, location, and extent of root cover, evaluating the tree's tolerance to construction impact based on its species and health, and identifying any past impacts that have occurred within the root zone; and

b. The alternative tree protection area is prepared under the supervision of the certified arborist.

4. The owner of the subject lot is required to ensure that the trees planted remain healthy for at least five years after inspection by the City and the owner of the subject lot shall be responsible for replacing any trees that do not remain healthy after inspection by the City.

C. Street tree requirements

1. Street trees are required for development that would add one or more principal dwelling units on a lot, except as provided in subsection 23.44.020.C.2 and Section 23.53.015. Existing street trees shall be retained unless the Director of Transportation approves their removal. The Director, in consultation with the Director of Transportation, shall determine the number, type, and placement of additional street trees to be provided in order to:

a. Improve public safety;

b. Promote compatibility with existing street trees;

c. Match trees to the available space in the planting strip;

d. Maintain and expand the urban forest canopy;

e. Encourage healthy growth through appropriate spacing;

f. Protect utilities; and

g. Allow access to the street, buildings, and lot.

2. Exceptions to street tree requirements

a. If a lot borders an unopened right-of-way, the Director may reduce or waive the street tree requirement along that right-of-way as a Type I decision if, after consultation with the Director of Transportation, the Director determines that the right-of-way is unlikely to be opened or improved.

b. If it is not feasible to plant street trees in a right-of-way planting strip, a 5-foot setback shall be planted with street trees along the street lot line that abuts the required

front yard, or landscaping other than trees shall be provided in the planting strip, subject to approval by the Director of the Seattle Department of Transportation. If, according to the Director of the Department of Transportation, a 5-foot setback or landscaped planting strip is not feasible, the Director may reduce or waive this requirement as a Type I decision.

Subchapter II Conditional Uses

23.44.021 General provisions

A. Only those conditional uses identified in this Subchapter II may be authorized as conditional uses in neighborhood residential zones. The Master Use Permit Process set forth in Chapter 23.76 shall be used to authorize conditional uses.

B. Unless otherwise specified in this Subchapter II, conditional uses shall meet the development standards for uses permitted outright in Sections 23.44.008 through 23.44.020.

C. A conditional use may be approved, conditioned, or denied based on a determination of whether the proposed use meets the criteria for establishing a specific conditional use and whether the use will be materially detrimental to the public welfare or injurious to property in the zone or vicinity in which the property is located.

D. In authorizing a conditional use, the Director or Council may mitigate adverse negative impacts by imposing requirements or conditions deemed necessary for the protection of other properties in the zone or vicinity in which the property is located.

E. Any use that was previously authorized by a conditional use permit but which has been discontinued shall not be reestablished or recommenced except pursuant to a new conditional use permit, provided that such permit is required for the use at the time re-establishment or recommencement is proposed. The following shall constitute conclusive evidence that the conditional use has been discontinued:

1. A permit to change the use of the property has been issued and the new use has been established; or

2. The property has not been devoted to the authorized conditional use for more than 24 consecutive months.

Vacant property, except for dead storage of materials or equipment of the conditional use, shall not be considered as being devoted to the authorized conditional use. The expiration of licenses necessary for the conditional use shall be evidence that the property is not being devoted to the conditional use. A conditional use in a multifamily structure or a multitenant commercial structure shall not be considered as discontinued unless all units are either vacant or devoted to another use.

F. Minor structural work that does not increase usable floor area or seating capacity and that does not exceed the development standards applicable to the use shall not be considered an expansion and does not require approval as a conditional use, unless the work would exceed the height limit of the zone for uses permitted outright. Such work includes but is not limited to roof repair or replacement and construction of uncovered decks and porches, facilities for barrier-free access, bay windows, dormers, and eaves.

Part 1 Administrative Conditional Uses

23.44.022 Institutions

A. Scope of standards

1. The standards of this Section 23.44.022 apply only to institutions permitted as conditional uses in neighborhood residential zones.

2. The following institutions may be permitted as conditional uses in neighborhood residential zones:

a. Community centers that provide shelter services;

b. Private schools;

c. Religious facilities;

d. Existing institutes for advanced study; and

e. Other similar institutions.

3. The following institutions are prohibited in neighborhood residential zones:

a. Hospitals;

b. Colleges;

c. Museums;

d. Private clubs; and

e. Vocational schools.

B. Major institutions. Existing major institutions and major institution uses within an existing Major Institution Overlay District shall be permitted in accordance with the provisions of Chapter 23.69 this Section 23.44.022.

C. Public schools shall be permitted as regulated in Section 23.51B.002.

D. General provisions

1. New or expanding institutions in neighborhood residential zones shall meet the development standards for uses permitted outright in Sections 23.44.008 through 23.44.020 unless modified elsewhere in this Section 23.44.022 or in a Major Institution master plan.

2. The establishment of a shelter for homeless youths and young adults in a legally established elementary or secondary school is not considered a new use or an expansion of the institutional use provided that:

a. The use does not violate any condition of approval of the existing institutional use;

b. The use does not require expansion of the existing structure;

c. Any new children's play area is located at least 30 feet from any other lot in a neighborhood residential zone and at least 20 feet from any lot in a multifamily zone; and

d. The occupants are enrolled students of the established school.

3. Institutions seeking to establish or expand on property that is developed with residential structures may expand their campus up to a maximum of 2.5 acres. An institution campus may be established or expanded beyond 2.5 acres if the property proposed for the expansion is substantially vacant land.

E. Dispersion. The lot line of any proposed new or expanding institution shall be located at least 600 feet from any lot line of any other institution in a residential zone, with the following exceptions:

1. An institution may expand even though it is within 600 feet of a public school if the public school is constructed on a new site subsequent to December 12, 1985.

2. A proposed institution may be located less than 600 feet from a lot line of another institution if the Director determines that the intent of the dispersion criteria is achieved due to the presence of physical elements that provide substantial separation from other institutions, such as bodies of water, large open spaces, or topographical breaks or other elements such as arterials, freeways, or nonresidential uses.

F. Demolition of residential structures. No residential structure shall be demolished, nor shall its use be changed to provide for parking. This prohibition may be waived if the demolition or change of use proposed is necessary to meet the parking requirements of Title 23 and if

alternative locations would have greater noise, odor, light and glare, or traffic impacts on surrounding property in residential use. If the demolition or change of use is proposed for required parking, the Director may consider waiver of parking requirements in order to preserve the residential structure and/or use. The waiver may include, but is not limited to, a reduction in the number of required parking spaces and a waiver of parking development standards such as location or screening.

G. Reuse of existing structures. Existing structures may be converted to institution use if the yard requirements for institutions are met. Existing structures that do not meet these yard requirements may be permitted to convert to institution use, provided that the Director may require additional mitigating measures to reduce impacts of the proposed use on surrounding properties.

H. Noise and odors

1. For the purpose of reducing potential noise and odor impacts, the Director shall consider the location on the lot of the proposed institution, on-site parking, outdoor recreational areas, trash and refuse storage areas, ventilating mechanisms, sports facilities, and other noise-generating and odor-generating equipment, fixtures, or facilities. The institution shall be designed and operated in compliance with Chapter 25.08.

2. In order to mitigate identified noise and/or odor impacts, the Director may require measures such as landscaping, sound barriers or fences, mounding or berming, adjustments to yard or parking development standards, design modifications, or setting hours of operation for facilities.

I. Landscaping

1. The Director shall promulgate rules to foster the long-term health, viability, and coverage of plantings. The rules shall address, at a minimum, the type and size of plants, spacing of plants, use of drought-tolerant plants, and access to light and air for plants. All landscaping provided to meet the requirements of this Section 23.44.022 shall comply with these rules.

2. Landscaping that achieves a Green Factor score of 0.3 or greater, pursuant to Section 23.86.019, is required for any lot with:

a. Development containing more than four new dwelling units;

b. Development, either a new structure or an addition to an existing structure, containing more than 4,000 new square feet of non-residential uses; or

c. Any parking lot containing more than 20 new parking spaces for automobiles.

J. Light and glare

1. Exterior lighting shall be shielded or directed away from adjacent residentially zoned lots. The Director may also require that the area, intensity, and location or angle of illumination be limited.

2. Nonreflective surfaces shall be used to help reduce glare.

K. Bulk and siting

1. Lot area. If the proposed site is more than one acre in size, the Director may require the following and similar development standards:

a. For lots with unusual configuration or uneven boundaries, the proposed principal structures be located so that changes in potential and existing development patterns on the block or blocks within which the institution is located are kept to a minimum;

b. For lots with large street frontage in relationship to their size, the proposed institution reflect design and architectural features associated with adjacent residentially zoned block fronts in order to provide continuity of the block front and to integrate the proposed structures with residential structures and uses in the immediate area.

2. Yards. Yards of institutions shall be as required for uses permitted outright pursuant to Section 23.44.014, provided that no structure other than freestanding walls, fences, bulkheads, or similar structures shall be closer than 10 feet to the side lot line. If the Director finds that a reduced yard will not significantly increase project impacts, including but not limited to noise, odor, and the scale of the structure in relation to nearby buildings, the side yard may be reduced to 5 feet. Fences and freestanding walls of utility services uses, regulated under this Section 23.44.022 pursuant to Section 23.51A.002, shall be set back from the street lot line a minimum of 10 feet, and landscaping shall be provided between the fence or wall and the right-of-way. The Director may reduce the required yard after finding that the reduced yard will not significantly increase project impacts, including but not limited to noise, odor, and the scale of the fence, wall, or structure in relation to nearby buildings. Acceptable methods to reduce fence or wall impacts include changes in the height, design, or construction of the fence or wall, including the use of materials, architectural detailing, artwork, vegetated trellises, decorative fencing, or similar features to provide visual interest facing the street lot line. Fences and walls may obstruct or allow views to the interior of a site. Where site dimensions and conditions allow, applicants are encouraged to provide both: a landscaped yard between the fence or wall and the right-of-way; and a fence or wall that provides visual interest facing the street lot line through the height, design, or construction of the fence or wall, including the use of materials, architectural detailing, artwork, vegetated trellises, decorative fencing, or similar features.

3. Institutions located on lots in more than one zone classification. For lots that include more than one zone classification, neighborhood residential zone provisions shall apply only to the neighborhood residential-zoned lot area involved.

4. Height limit

a. Religious symbols for religious institutions may extend an additional 25 feet above the height limit.

b. For gymnasiums and auditoriums that are accessory to an institution the maximum height shall be 35 feet if portions of the structure above 35 feet are set back at least 20 feet from all property lines. Pitched roofs on a gymnasium or auditorium that have a slope of not less than 4:12 may extend 10 feet above the 35-foot height limit. No portion of a shed roof on a gymnasium or an auditorium shall be permitted to extend beyond the 35-foot height limit under this provision.

5. Facade scale. If any facade of a new or expanding institution is longer than 30 feet, the Director may require that facades adjacent to the street or a residentially zoned lot be developed with design features intended to minimize the appearance of bulk. Design features that may be required include, but are not limited to, modulation, architectural features, landscaping, and increased yards.

L. Parking and loading berth requirements

1. Quantity and location of off-street parking

a. Use of transportation modes such as public transit, vanpools, carpools, and bicycles to reduce the use of single-occupancy vehicles is encouraged.

b. Parking and loading is required as provided in Section 23.54.015.

c. The Director may modify the parking and loading requirements of Section 23.54.015 and the requirements of Section 23.44.016 on a case-by-case basis using the information contained in the transportation plan prepared pursuant to subsection 23.44.022.M. The modification shall be based on adopted City policies and shall:

1) Provide a demonstrable public benefit, such as reduction of traffic on residential streets, preservation of residential structures, and reduction of noise, odor, light, and glare; and

2) Not cause undue traffic through residential streets or create a safety hazard.

2. Parking design. Parking access and parking shall be designed as provided in Chapter 23.54.

3. Loading berths. The quantity and design of loading berths shall be as provided in Chapter 23.54.

M. Transportation plan. A transportation plan shall be required for proposed new institutions and for those institutions proposing expansions that are larger than 4,000 square feet of structure area and/or are required to provide an additional 20 or more parking spaces. The Director shall determine the level of detail to be disclosed in the transportation plan based on the probable impacts and/or scale of the proposed institution. Discussion of the following elements and other factors may be required:

1. Traffic. Number of staff on site during normal working hours, number of users, guests and others regularly associated with the site, level of vehicular traffic generated, traffic peaking characteristics of the institution and in the immediate area, likely vehicle use patterns,

extent of traffic congestion, types and numbers of vehicles associated with the institution, and mitigating measures to be taken by the applicant;

2. Parking. Number of spaces, the extent of screening from the street or abutting residentially zoned lots, direction of vehicle light glare, direction of lighting, sources of possible vibration, prevailing direction of exhaust fumes, location of parking access and curb cuts, accessibility or convenience of parking, and measures to be taken by the applicant such as preference given to some parking spaces for carpool and vanpool vehicles and provision of bicycle racks;

3. Parking overflow. Number of vehicles expected to park on neighboring streets, percentage of on-street parking supply to be removed or used by the proposed project, opportunities for sharing existing parking, trends in local area development, and mitigating measures to be taken by the applicant;

4. Safety. Measures to be taken by the applicant to ensure safe vehicular and pedestrian travel in the vicinity;

5. Availability of public or private mass transportation systems. Route location and frequency of service and private mass transportation programs to be provided by the applicant, such as carpools and vanpools.

N. Development standards for existing institutes for advanced study

1. The institute shall be located on a lot of not less than 15 acres.

2. The lot coverage for all structures shall not exceed 20 percent of the total lot area.

3. Structures shall be set back a minimum of 25 feet from any lot line.

4. Parking areas shall be set back a minimum of 10 feet from any lot line.

5. In the event of expansion, parking shall be required as provided for existing institutes for advanced study in Section 23.54.015.

6. Landscaping shall be provided between a lot line and any structure and shall be maintained for the duration of the use.

23.44.024 Clustered housing planned developments

Clustered housing planned developments (CHPDs) may be permitted as an administrative conditional use in NR1, NR2, and NR3 zones. A CHPD is intended to enhance and preserve natural features, encourage the construction of low-income housing, allow for development and design flexibility, and protect and prevent harm in environmentally critical areas. CHPDs shall be subject to the following provisions:

A. Site requirements

1. The minimum size of a CHPD is two acres, excluding submerged land and any land designated an environmentally critical area or buffer due to the presence of a riparian corridor, wetland, wetland buffer, priority habitat area, steep slope, or steep slope buffer according to Chapter 25.09, Regulations for Environmentally Critical Areas.

2. Where portions of a site are designated an environmentally critical area or buffer due to the presence of a riparian corridor, wetland, wetland buffer, priority habitat area, steep slope, or steep slope buffer according to Chapter 25.09, Regulations for Environmentally Critical Areas, the conditional use provisions under Section 25.09.260 shall apply, superseding the standards of this Section 23.44.024.

3. The Director may exclude land from a CHPD if it is separated from the site by topography, if it has a poor functional relationship with the site, or if including the land would have a negative impact on adjacent neighborhood residential zoned lots.

B. Type of dwelling units permitted. Only single-family dwelling units shall be permitted in a CHPD.

C. Number of dwelling units permitted

1. The number of dwelling units permitted in a CHPD shall be calculated by dividing the CHPD land area by the minimum lot area required in subsection 23.44.010.A for the neighborhood residential where the CHPD is located. Land that is designated an environmentally critical area or buffer due to the presence of a riparian corridor, wetland, wetland buffer, priority habitat area, steep slope, or steep slope buffer and submerged land shall be excluded from the land used to calculate the permitted number of dwelling units in a CHPD. For CHPDs located in more than one zone, the number of dwelling units shall be calculated based on the proportion of land area in each zone.

2. Where portions of a site are designated an environmentally critical area or buffer due to the presence of a riparian corridor, wetland, wetland buffer, priority habitat area, steep slope, or steep slope buffer according to Chapter 25.09, Regulations for Environmentally Critical Areas, the administrative conditional use provisions under Section 25.09.260 shall apply.

3. One additional detached single-family structure may be permitted if the development includes one or more of the following facilities open to the surrounding community:

a. Usable open space and other recreational facilities approved by the Director;

b. Community center; and

c. Child care facility.

D. Subdivision. A CHPD may be subdivided into lots of less than the minimum area required by subsection 23.44.010.A.

E. Yards. Yards shall be required for structures within a CHPD. For the purposes of this subsection 23.44.024.E, setbacks shall be considered yards, and the provisions relating to accessory structures in required yards of the applicable neighborhood residential zone shall apply.

1. Structures shall be set back a minimum distance of 20 feet from the street lot line of a CHPD.

2. No dwelling unit in a CHPD shall be closer than 5 feet to a side lot line of an abutting neighborhood residential zoned lot.

3. No dwelling unit in a CHPD shall be closer than 25 feet to a rear lot line of an abutting neighborhood residential zoned lot.

4. No dwelling unit in a CHPD shall be closer than 5 feet to any lot line of an abutting non-neighborhood residential zoned lot.

5. There shall be a minimum distance of 10 feet between principal structures within 100 feet of the lot line of a CHPD.

6. To provide a sense of privacy and to mitigate the effects of shadows between structures located more than 100 feet from the lot line of a CHPD, the required separation between structures in the CHPD shall vary depending on the design of the facing facades as follows:

a. Walls of interior facades that do not have a principal entrance shall be at least 10 feet apart at any point.

b. A principal entrance to a structure shall be at least 15 feet from the nearest interior facade that does not have a principal entrance.

c. A principal entrance to a structure shall be at least 20 feet from the nearest interior facade with a principal entrance.

7. The Director may increase the minimum required yards or require alternate spacing or placement of structures in order to:

a. preserve or enhance topographical conditions;

b. enhance the relationship with adjacent uses and the layout of the project;

c. promote green stormwater infrastructure and other measures to reduce stormwater runoff; or

d. maintain a compatible scale and design with the surrounding community.

F. Landscaping. The Director may require retention of existing mature landscaping, or provision of new landscaping, where that existing or new landscaping is compatible with surrounding flora and favors native species to:

1. Minimize the impacts of the CHPD on adjacent land uses along some or all exterior lot lines;

2. Reduce stormwater runoff, potential erosion, and impervious surfaces; or

3. Screen parking from the view of adjacent residentially zoned lots and the street.

G. Maintenance of required landscaping and open space. Required landscaping and open space shall be maintained for the life of the project. Maintenance of required landscaping and open space shall be the continuing responsibility of the owner.

23.44.026 Use of landmark structures or sites

A. The Director may authorize a use not otherwise permitted in the zone as an administrative conditional use within a structure or on a site designated as a landmark pursuant to Chapter 25.12 subject to the following development standards:

1. The use shall be compatible with the existing configuration of the site and with the existing design and/or construction of the structure without significant alteration; and

2. The use shall be allowed only when it is demonstrated that uses permitted in the zone are impractical because of site configuration or structure design and/or that no permitted use can provide adequate financial support necessary to sustain the structure or site in a reasonably good physical condition; and

3. The use shall not be detrimental to other properties in the zone or vicinity or to the public interest.

B. The parking requirements for a use allowed in a landmark are those listed in Section 23.54.015. These requirements may be waived pursuant to subsection 23.54.020.C.

23.44.028 Structures unsuited to uses permitted outright

A. Uses not otherwise permitted in the zone may be permitted as an administrative conditional use in structures unsuited to uses permitted outright in neighborhood residential zones. The determination that a use may be permitted shall be based on the following factors:

1. The design of the structure is not suitable for conversion to a use permitted outright in a neighborhood residential zone; and

2. The structure contains more than 4,000 square feet; and

3. The proposed use will provide a public benefit.

B. Parking requirements for uses permitted under this section shall be determined by the Director.

C. The Director may require measures to mitigate impacts such as noise, odor, parking or traffic impacts. Mitigating measures may include but are not limited to landscaping, sound barriers, fences, mounding or berming, adjustments to development standards, design modifications or setting hours of operation.

D. In the case of an existing or former public school, permissible uses other than those permitted outright in the zone and their development standards including parking requirements shall be established only pursuant to procedures for establishing criteria for joint use or reuse of public schools in Chapter 23.78 of this Land Use Code.

23.44.030 Park and ride facility

The Director may authorize a park and ride facility under the management of a public agency responsible for commuter pooling efforts as an administrative conditional use. The Director shall determine that:

A. It is to be located on an existing parking lot;

B. That parking proposed for the park and ride facility is not needed by the principal use or its accessory uses during the hours proposed for park and ride use; and

C. The park and ride use shall not interfere or conflict with the peak-hour activities associated with the principal use and its accessory uses. The Director may control the number and location of parking spaces to be used.

23.44.032 Certain nonconforming uses.

Nonconforming uses which are authorized pursuant to Section 23.42.110 may be permitted as a conditional use.

Part 2 Council Conditional Uses

23.44.034 Planned residential development (PRD)

Planned residential developments (PRDs) may be permitted in NR1, NR2, and NR3 zones as a council conditional use. A PRD is intended to enhance and preserve natural features, encourage the construction of low-income housing, allow for development and design flexibility, promote green stormwater infrastructure and protect and prevent harm in environmentally critical areas. PRDs shall be subject to the following provisions:

A. Site requirements

1. The minimum size of a PRD is two acres, excluding submerged land and any land designated as an environmentally critical area or buffer due to the presence of a riparian corridor, wetland, wetland buffer, steep slope, or steep slope buffer according to Chapter 25.09, Regulations for Environmentally Critical Areas.

2. The area of the site devoted to single-family uses at the time of application, calculated by multiplying the number of such uses by the minimum lot area for the zone, shall not exceed 20 percent of the area of the entire site.

3. Land that is designated as an environmentally critical area or buffer due to the presence of a riparian corridor, wetland, wetland buffer, steep slope, or steep slope buffer according to Chapter 25.09, Regulations for Environmentally Critical Areas, and submerged land shall be excluded from the land used to calculate permitted density in a PRD.

4. Land may be excluded from a PRD by the Director if it is separated from the site by topography, if it has a poor functional relationship with the site, or if including the land would have a negative impact on adjacent neighborhood residential zoned lots.

5. Where portions of a site are designated as an environmentally critical area or buffer due to the presence of a riparian corridor, wetland, wetland buffer, steep slope, or steep slope buffer according to Chapter 25.09, Regulations for Environmentally Critical Areas, the conditional use provisions under Section 25.09.260 shall apply, superseding the standards of this Section 23.44.034.

B. Type of housing permitted

1. Only single-family dwelling units are permitted within 100 feet of a PRD lot line that abuts or is directly across the street from a neighborhood residential zoned lot, except as provided in this subsection 23.44.034.B.

2. Single-family dwelling units, cottage housing developments, rowhouse developments, and townhouse developments are permitted within 100 feet of a lot line of a PRD that does not abut and is not across a street from a neighborhood residential zoned lot, or that is separated from the neighborhood residential zoned lot by physical barriers, such as bodies of water, ravines, greenbelts, freeways, expressways, and other major traffic arterials or topographic breaks that provide substantial separation from the surrounding neighborhood residential neighborhood.

3. Single-family dwelling units, cottage housing developments, rowhouse developments, and townhouse developments are permitted when more than 100 feet from a lot line of a PRD.

4. Cottage housing developments, rowhouse developments, and townhouse developments shall meet the development standards for structures in LR1 zones, unless otherwise specified in this Chapter 23.44.

C. Number of dwelling units permitted

1. The number of dwelling units permitted in a PRD shall be calculated by dividing the PRD lot area by the minimum lot area required in subsection 23.44.010.A. If the PRD includes more than one zone, the number of dwelling units shall be calculated based on the proportion of land area in each zone.

2. An increase in number of dwelling units may be permitted in a PRD up to a maximum increase of 20 percent. An increase in permitted density shall be based on the extent to which the proposed PRD provides substantial additional public benefits such as the following:

a. Low-income housing;

b. Usable open space;

c. Child care center, meeting space, or recreational facilities open to the surrounding community; and

d. Green stormwater infrastructure beyond the requirements of the Stormwater Code (Chapters 22.800 through 22.808).

D. Subdivision

1. A PRD may be subdivided into lots of less than the minimum size required by subsection 23.44.010.A.

2. A minimum of 300 square feet of private, landscaped open space is required for each unit and shall be provided at ground level and directly accessible to the unit.

E. Yards. Yards shall be required for residential structures within a PRD. For the purposes of this subsection 23.44.034.E, setbacks shall be considered yards, and the provisions relating to accessory structures in required yards of the applicable neighborhood residential zone shall apply.

1. Structures within 100 feet of the exterior lot line of a PRD shall be set back a minimum distance of 20 feet from the street lot line of a PRD.

2. No dwelling unit in a PRD shall be closer than 5 feet to a side lot line of an abutting neighborhood residential zoned lot.

3. No dwelling unit in a PRD shall be closer than 25 feet to a rear lot line of an abutting neighborhood residential zoned lot.

4. No dwelling unit in a PRD shall be closer than 5 feet to any lot line of an abutting non-residentially zoned lot.

5. Principal structures shall be at least 10 feet apart.

6. To provide a sense of privacy and to mitigate the effects of shadows between structures that are more than 100 feet from the lot line of a PRD, the required separation between structures shall vary depending on the design of the facing facades as follows:

a. Walls shall be at least 10 feet apart.

b. A principal entrance to a structure shall be at least 15 feet from the nearest interior facade that does not have a principal entrance.

c. A principal entrance to a structure shall be at least 20 feet from the nearest interior facade with a principal entrance.

7. The Director may modify the minimum required setbacks or require alternate spacing or placement of structures in order to preserve or enhance topographical conditions, enhance the relationship with adjacent uses or the layout of the project, promote green stormwater infrastructure and other measures to reduce stormwater runoff, or maintain a compatible scale and design with the surrounding community.

F. Landscaping. The Director may require landscaping that is compatible with surrounding flora and favors native species in addition to the following requirements:

1. Minimize the impacts of the PRD on adjacent land uses along some or all exterior lot lines;

2. Reduce stormwater runoff, potential erosion, and impervious surfaces; and/or

3. Screen parking from the view of adjacent residentially zoned lots and the street.

G. Maintenance of required landscaping and open space. Required landscaping and open space shall be maintained for the life of the project. Maintenance of required landscaping and open space shall be the continuing responsibility of the owner.

23.44.035 Communication utilities.

Communication utilities may be permitted in neighborhood residential zones subject to the provisions of section 23.57.010.

23.44.036 Public facilities

Public facilities may be permitted in neighborhood residential zones according to the provisions of Section 23.51A.002 and the provisions of Chapter 23.76, Subchapter III, Council Land Use Decisions. Public facilities include, but are not limited to, police precinct stations, fire stations, public boat moorages, and utility services uses.

Subchapter III Accessory Uses

23.44.040 General Provisions

A. Accessory uses customarily incidental to principal uses permitted outright are permitted outright.

B. All accessory uses and structures, except for urban farms and structures in urban farm use, must be located on the same lot as the principal use or structure unless otherwise specifically provided.

C. Accessory conditional uses are subject to the development standards for accessory uses permitted outright unless otherwise specified in this Section 23.44.040. Urban farms also are subject to the development standards in Section 23.42.051.

23.44.042 Urban farms

A. An urban farm with up to 4,000 square feet of planting area is permitted outright as an accessory use to any principal use permitted outright or to a permitted conditional use, in each case subject to the applicable standards of this title, including the provisions of Section 23.42.051.

B. An urban farm with over 4,000 square feet of planting area may permitted as an administrative conditional use accessory to any principal use permitted outright or accessory to a permitted conditional use, pursuant to Sections 23.44.021 and 23.42.051.

23.44.044 Swimming pools

Private, permanent swimming pools, hot tubs and other similar uses are permitted as accessory uses to a single-family structure subject to the following specific development standards:

A. Private, permanent swimming pools, hot tubs and other similar uses over 18 inches above existing grade are subject to the development standards for accessory uses.

B. Private, permanent swimming pools, hot tubs and other similar uses projecting not more than 18 inches above existing grade shall not be counted in lot coverage.

C. Private, permanent swimming pools, hot tubs and other similar uses may be placed in a required front or rear yard, provided that:

1. No part of the structure shall project more than 18 inches above existing lot grade in a required front yard; and

2. No part of the structure shall be placed closer than 5 feet to any front or side lot line.

23.44.046 Solar collectors

A. Solar collectors are permitted outright as an accessory use to any principal use permitted outright or to a permitted conditional use and accessory dwelling units subject to the following development standards:

1. Solar collectors, including solar greenhouses, shall not be counted in lot coverage.

2. Solar collectors except solar greenhouses attached to principal use structures may exceed the height limits of neighborhood residential zones by 4 feet or extend 4 feet above the ridge of a pitched roof. However, the total height from existing grade to the top of the solar collector may not extend more than 9 feet above the height limit established for the zone (see Exhibit 23.44.046 A). A solar collector that exceeds the height limit for neighborhood residential zones shall be placed so as not to shade an existing solar collector or property to the north on January 21, at noon, any more than would a structure built to the maximum permitted height and bulk.

3. Solar collectors and solar greenhouses may be located in required yards according to the following conditions:

a. In a side yard, no closer than 3 feet from the side property line; or

b. In a rear yard, no closer than 15 feet from the rear property line unless there is a dedicated alley, in which case the solar collector shall be no closer than 15 feet from the centerline of the alley; or

c. In a front yard, solar greenhouses which are integrated with the principal structure and have a maximum height of 12 feet may extend up to 6 feet into the front yard. In no case shall the greenhouse be located closer than 5 feet from the front property line.

B. Nonconforming solar collectors. The Director may permit the installation of solar collectors which cause an existing structure to become nonconforming, or which increase an existing nonconformity, as a special exception pursuant to Chapter 23.76. Such installation may be permitted even if it exceeds the height limit established in subsection 23.44.046.A.2, so long as total structure height including solar collectors does not exceed 39 feet above existing grade and the following conditions are met:

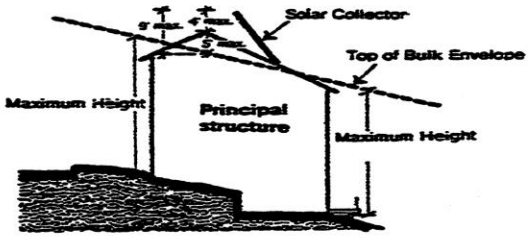
1. There is no feasible alternative to placing the collector(s) on the roof;

2. Such collector(s) are located so as to minimize view blockage for surrounding properties and shading of property to the north, while still providing adequate solar access for the collectors;

3. Such collector(s) meet minimum written energy conservation standards administered by the Director; and

4. The collector(s) add no more than 7 feet of height to the existing structure. To minimize view blockage or shadow impacts, the Director shall have the authority to limit a nonconforming solar collector to less than 7 additional feet of height.

Exhibit 23.44.046 A
Pitched Roof With Solar Collector



23.44.048 Keeping of animals.

The keeping of animals is regulated by Section 23.42.052, Keeping of Animals.

23.44.050 Home occupations.

Home occupations are regulated by Section 23.42.050, Home Occupations.

23.44.051 Bed and breakfasts

A bed and breakfast use is permitted if it meets the following standards:

A. General provisions

1. The bed and breakfast use shall have a valid business license tax certificate issued by the Department of Finance and Administrative Services;

2. All operators of bed and breakfast uses who use a short-term rental platform for listing the bed and breakfast shall have a valid short-term rental operator's license issued by the Department of Finance and Administrative Services.

3. The bed and breakfast use shall be operated by the primary resident of the dwelling unit where the bed and breakfast is located or the resident operator;

4. There shall be no evidence of the bed and breakfast use visible from the exterior of the dwelling unit except for a sign permitted by subsection 23.55.020.D.1;

5. The bed and breakfast use shall have no more than five guest rooms, provided that this limitation does not apply to bed and breakfast uses that were established on or before April 1, 1987; and

6. A bed and breakfast use may be located in a dwelling unit or an accessory dwelling unit.

B. Alterations to single-family structures. Interior and exterior alterations consistent with the development standards of the underlying zone are permitted.

23.44.052 Open wet moorage

Piers and floats for open wet moorage of private pleasure craft are permitted as regulated by the Shoreline District, Chapter 23.60A.

23.44.053 Transitional encampments accessory use

Transitional encampments accessory to religious facilities or to principal uses located on property owned or controlled by a religious organization are regulated by Section 23.42.054, Transitional Encampments Accessory to Religious Facilities.

23.44.058 Columbariums, garden wall crypts and mausoleums.

Columbariums, garden wall crypts and mausoleums are permitted only as accessory to existing cemeteries except that columbariums and garden wall crypts may also be accessory to religious facilities, and subject to the general development standards for accessory uses. In addition, no interment openings shall abut or be directly across the street from property other than cemetery property. For columbariums, garden wall crypts and mausoleums accessory to existing cemeteries, any border between structures and the property line shall be landscaped and maintained by the owner in good condition. For columbariums and garden wall crypts accessory to religious facilities, the landscaping requirements of SMC Section 23.44.022 I applicable to religious facilities and other institutions shall apply.

23.44.060 Uses accessory to parks and playgrounds

A. The following accessory uses shall be permitted in any park when within a structure or on a terrace abutting the structure:

1. The sale and consumption of beer during daylight hours;

2. The sale and consumption of alcoholic beverages under a Class H liquor license at municipal golf courses during established hours of operation.

When the use is within one hundred (100) feet from any lot in a residential zone the use shall be completely enclosed.

B. The sale and consumption of beer and wine with meals served in a restaurant facility within the boundaries of Woodland Park shall be permitted. The use shall be permitted in only one (1) facility located no closer than one hundred (100) feet from any lot in a residential zone and separated from other public activity areas and zoo buildings by at least fifty (50) feet.

C. Storage structures and areas and other structures and activities customarily associated with parks and playgrounds are subject to the following development standards in addition to the general development standards for accessory uses:

1. Any active play area shall be located 30 feet or more from any lot in a neighborhood residential zone.

2. Garages and service or storage areas shall be located 100 feet or more from any other lot in a residential zone and obscured from view from each such lot.

23.44.068 Heat recovery incinerator.

The Director may permit a heat recovery incinerator as an accessory use to institutions, public facilities and parks and playgrounds, subject to the following conditions:

A. The incinerator shall be located on the same lot as the institution or public facility.

B. An incinerator in a park or playground shall be permitted only when a permanent structure other than that which houses the incinerator exists and the incinerator abuts the structure.

C. The use shall be located no closer than one hundred (100) feet to any property line unless completely enclosed within a structure.

D. If not within a structure, the use shall be enclosed by a view-obscuring fence of sufficient strength and design to resist entrance by children.

E. Adequate control measures for insects, rodents and odors shall be maintained continuously.

23.44.070 Recycling collection stations.

The Director may permit recycling collection stations as accessory uses to institutions and public facilities. These recycling collection stations shall be maintained in good condition by the respective institution or public facility.

CITY OF SEATTLE

ORDINANCE 127219

COUNCIL BILL 120969

AN ORDINANCE relating to land use and zoning; implementing interim controls to comply with various state laws; establishing findings and adopting a workplan for permanent legislation; amending Sections 23.22.062, 23.24.045, 23.34.011, 23.44.006, 23.44.010, 23.44.011, 23.44.012, 23.44.014, 23.44.016, 23.44.017, 23.44.044, 23.45.512, 23.45.514, 23.45.518, 23.45.522, 23.45.527, 23.45.529, 23.53.006, 23.53.025, 23.54.015, 23.54.020, 23.54.030, 23.84A.010, 23.84A.025, 23.84A.036, and 25.09.240 of the Seattle Municipal Code.

WHEREAS, the Office of Planning and Community Development, in cooperation with other City agencies including the Seattle Planning Commission, began in 2022 a series of programs and events, under the title One Seattle Plan, to engage the public in discussions about potential changes to the Comprehensive Plan, consistent with the One Seattle Plan Public Participation Plan and documented in the One Seattle Plan Public Engagement Report; and

WHEREAS, in April 2021, the Washington State Legislature passed Chapter 300, Laws of 2021 (also known as House Bill 1287), which directed the building code council to adopt rules for electric vehicle infrastructure requirements; and

WHEREAS, in April 2023, the Washington State Legislature passed Chapter 322, Laws of 2023 (also known as House Bill 1110), which amended the Growth Management Act to require certain cities, including Seattle, to allow the development of "middle housing" in all residential areas, including at least four units on each lot and at least six units per lot near transit or when at least two units are affordable; and

WHEREAS, in April 2023, the Washington State Legislature passed Chapter 333, Laws of 2023 (also known as House Bill 1293), which imposes limits on design review and requires that design standards be clear and objective; and

WHEREAS, in March 2024, the Washington State Legislature passed Chapter 152, Laws of 2024 (also known as House Bill 2321), which clarified standards implemented through House Bill 1110; and

WHEREAS, in March 2024, the Washington State Legislature passed Chapter 274, Laws of 2024 (also known as Senate Bill 6015), which imposes restrictions on parking requirements; and

WHEREAS, in March 2024, the Office of Planning and Community Development published a Draft Environmental Impact Statement analyzing the potential effects of five different growth alternatives in the city through 2044 and a "no action" alternative, conducted two public hearings, and received comments from the public on this document; and

WHEREAS, in March 2024, the Office of Planning and Community Development published a Draft Comprehensive Plan rooted in a deliberate approach to creating more housing, encouraging density near amenities and frequent transit, and preventing displacement; and

WHEREAS, in Spring 2024, the Office of Planning and Community Development held open houses across all seven council districts and received input from residents and community groups over a two-month public comment period on the draft plan and an initial proposal for updating Neighborhood Residential zones; and

WHEREAS, in Fall 2024, the Office of Planning and Community Development held open houses across all seven council districts and received input from residents and community

groups over a two-month public comment period on a revised proposal for updating Neighborhood Residential zones and draft legislation; and

WHEREAS, in January 2025, the Office of Planning and Community Development published a Final Environmental Impact Statement that included analysis of a preferred growth strategy alternative that increased potential housing supply in the city by doubling residential development capacity and that promoted housing supply, variety, and affordability by adding new and expanded areas for growth in neighborhoods across the city;

WHEREAS, in February 2025, the Final Environmental Impact Statement was appealed to the Hearing Examiner;

NOW, THEREFORE,

BE IT ORDAINED BY THE CITY OF SEATTLE AS FOLLOWS:

Section 1. The City Council makes the following legislative findings of fact and declares as follows:

A. Chapter 322, Laws of 2023, Chapter 333, Laws of 2023, and Chapter 152, Laws of 2024, establish a deadline for local jurisdiction compliance of six months after its next periodic comprehensive plan update required under RCW 36.70A.130. The Washington State Department of Commerce has interpreted this deadline to be six months after the statutory deadline established in RCW 36.70A.130. Consistent with this guidance, a compliance deadline for The City of Seattle would be June 30, 2025. The requirements of Chapter 300, Laws of 2021, and Chapter 274, Laws of 2024, are currently in effect.

B. The Land Use Code does not fully comply with Chapter 300, Laws of 2021, Chapter 322, Laws of 2023, Chapter 333, Laws of 2023, Chapter 152, Laws of 2024, and Chapter 274, Laws of 2024, necessitating amendment of the code to ensure consistency with State law.

C. In October 2024, the Washington State Department of Commerce released an updated model ordinance for local implementation of Chapter 322, Laws of 2023.

D. Chapter 322, Laws of 2023, stipulates that if a jurisdiction fails to enact development regulations that comply with its requirements by the deadline, that the model ordinance supersedes any non-compliant local development regulations for the purpose of issuance of permits for middle housing development.

E. The Final Environmental Impact Statement (FEIS) released by the Office of Planning and Community Development in January 2025 includes analysis of a preferred alternative that implements Chapter 300, Laws of 2021, Chapter 322, Laws of 2023, Chapter 333, Laws of 2023, Chapter 152, Laws of 2024, and Chapter 274, Laws of 2024 through amendments to the City's Comprehensive Plan and zoning regulations.

F. Following a 14-day appeal period, six separate appeals of the adequacy of the FEIS were submitted to the City's Hearing Examiner.

G. Consistent with subsection 23.76.062.D and Sections 25.05.055 and 25.05.070 of the Seattle Municipal Code, the City Council could not take action to approve legislation that is subject to an active appeal under the State Environmental Policy Act (SEPA).

H. On April 11, 2025, the City Hearing Examiner dismissed all six appeals of the FEIS pursuant to RCW 36.70A.600(3), RCW 36.70A.680(3), and RCW 43.21C.495.

I. If the City does not enact legislation to meet the requirements of Chapter 322, Laws of 2023, by June 30, 2025, any denial of a permit for development of middle housing that is

inconsistent with current development regulations is subject to challenge on the basis that State model code would supersede the City's development regulations. The City would also be subject to potential challenge to any permitting decision related to the requirements of other State legislation cited in subsection 1.B of this ordinance.

J. Adopting interim legislation at this time, as an alternative to allowing the State model code to apply automatically, is necessary to ensure that the requirements governing approval of permits for middle housing meet the minimum requirements of Chapter 322, Laws of 2023, and to ensure that regulations for middle housing development are sufficiently clear and complete for the issuance of permits by the City. Interim legislation will also ensure compliance with other new State requirements cited in subsection 1.B of this ordinance.

Section 2. The interim development regulations set forth in this ordinance shall be in effect for a period of one year from the effective date of this ordinance and shall automatically expire after the one-year period unless the same is extended as provided by statute, or unless terminated sooner by the City Council.

Section 3. Pursuant to RCW 36.70A.390, the Council will hold a public hearing prior to adoption or within 60 days of adoption of this interim zoning legislation to take public testimony and to consider adopting further findings.

Section 4. Under RCW 36.70A.390, the Council approves the following work plan for the development of permanent regulations to address the issues in this ordinance and directs the Office of Planning and Community Development to transmit proposed legislation. The Council intends to consider the permanent legislation and to adopt the Seattle Comprehensive Plan under the following schedule:

Mayor Transmits Legislation to Council	Anticipated May 2025
Council Deliberations and Public Hearing on Proposed Comprehensive Plan and Permanent Controls	Anticipated June through September 2025
Comprehensive Plan and Permanent Controls Effective	Anticipated October 2025

The Council intends to consider the issues included in Attachment 1 during its deliberations on the permanent legislation.

Section 5. Based on the authority of RCW 36.70A.390 and the findings in Section 1 of this ordinance, Section 23.76.062 of the Seattle Municipal Code is waived for the adoption of this ordinance.

Section 6. Based on the findings of fact set forth in Section 1 of this ordinance, the City Council may renew these interim regulations for one or more six-month periods in accordance with RCW 36.70A.390.

Section 7. [Reserved]

Section 8. [Reserved]

Section 9. Section 23.34.011 of the Seattle Municipal Code, last amended by Ordinance 126509, is amended as follows:

23.34.011 NR1, NR2, and NR3 zones, function, and locational criteria

A. Function. An area that provides ((~~predominantly detached single-family structures on lot sizes compatible with the existing pattern of development and the character of neighborhood residential areas~~)) <u>for the development of detached, attached, and stacked dwelling units within a predominately three-story height limit</u>.

* * *

Section 10. Section 23.44.006 of the Seattle Municipal Code, last amended by Ordinance 126858, is amended as follows:

23.44.006 Principal uses permitted outright

The following principal uses are permitted outright in neighborhood residential zones:

A. Single-family dwelling unit;

B. ((~~In RSL zones, apartments~~)) Apartments, carriage houses, cottage housing development, rowhouse development, and townhouse developments;

* * *

Section 11. Section 23.44.010 of the Seattle Municipal Code, last amended by Ordinance 126685, is amended as follows:

23.44.010 Minimum lot area and lot coverage

* * *

C. ((~~Maximum lot coverage 1.~~)) Maximum lot coverage

1. The maximum lot coverage permitted for principal and accessory structures ((~~is as provided in Table B for 23.44.010~~)) on a lot with two or more principal and detached accessory dwelling units is 50 percent.

2. The maximum lot coverage permitted for structures on a lot with no more than one principal dwelling unit and no detached accessory dwelling units is as follows:

a. On a lot greater than or equal to 5,000 square feet, the maximum permitted lot coverage is 35 percent; and

b. On a lot less than 5,000 square feet, the maximum permitted lot coverage is 1,000 square feet plus 15 percent of lot area, provided that lot coverage cannot exceed 50 percent.

~~((Table B for 23.44.010 Maximum lot coverage~~		
~~Zone~~	~~Lot size~~	~~Maximum lot coverage~~
~~NR1, NR2, and NR3~~	~~Less than 5,000 square feet~~	~~1,000 square feet plus 15 percent of lot area~~
	~~5,000 square feet or more~~	~~35 percent of lot area~~
~~RSL~~	~~All lots~~	~~50 percent of lot area~~

~~2. For purposes of computing maximum lot coverage, only those portions of a lot that measure at least 10 feet in all directions shall be included in lot coverage calculations, except for portions of a lot that are used for access or that are granted a waiver under subsections 23.22.100.D, 23.24.040.B, or 23.28.030.A.4 for the purpose of providing access.~~))

* * *

Section 12. Section 23.44.011 of the Seattle Municipal Code, last amended by Ordinance 126685, is amended as follows:

23.44.011 Floor area in neighborhood residential zones

A. Gross floor area. In neighborhood residential zones, gross floor area includes exterior corridors, breezeways, and stairways that provide building circulation and access to dwelling units or sleeping rooms. Balconies, patios, and decks that are associated with a single dwelling unit or sleeping room and that are not used for common circulation, and ground-level walking paths, are not considered gross floor area.

B. Floor area ratio (FAR) limits.

((~~1. The FAR limit on lots developed with a single-family dwelling unit as the principal use in NR1, NR2, and NR3 zones, is 0.5, except that lots with less than 5,000 square feet of lot area can include up to 2,500 square feet of total chargeable floor area. The applicable FAR limit applies to the total chargeable floor area of all structures on the lot.~~

~~2. The FAR limit in RSL zones is 0.75. The applicable FAR limit applies to the total chargeable floor area of all structures on the lot.~~)) The FAR limit in neighborhood residential zones for lots with residential uses is as shown in Table A for 23.44.011, except that in NR1, NR2, and NR3 zones, lots with less than 5,000 square feet of lot area can include up to 2,500 square feet of total chargeable floor area or the amount of total chargeable floor area allowed by the FAR limit shown in Table A for 23.44.011, whichever is greater. The applicable FAR limit applies to the total chargeable floor area of all structures on the lot.

Table A for 23.44.011
Floor area ratio (FAR) in neighborhood residential zones

Density (dwelling units per lot size)	**FAR**
Less dense than 1 unit / 4,000 square feet	0.6 in NR1, NR2, and NR3 zones 0.75 in RSL zones
1 unit / 4,000 square feet to 1 unit / 2,201 square feet	0.8
1 unit / 2,200 square feet to 1 unit / 1,601 square feet	1.0
1 unit / 1,600 square feet or denser	1.2

C. The following floor area is exempt from FAR limits:

1. All stories, or portions of stories, that are underground.

2. All portions of a story that extend no more than 4 feet above existing or finished grade, whichever is lower, excluding access.

((~~3. In NR1, NR2, and NR3 zones:~~

~~a. Any floor area contained in an accessory dwelling unit;~~

~~b. Either up to 500 additional square feet of floor area in any accessory structure that is not a detached accessory dwelling unit, or up to 250 square feet of floor area in an attached garage.~~))

3. Common walls separating individual attached dwelling units.

4. In RSL zones, 50 percent of the chargeable floor area contained in structures built prior to January 1, 1982, as single-family dwelling units that will remain in residential use,

regardless of the number of dwelling units within the existing structure, provided the exemption is limited to the gross square footage in the single-family dwelling unit as of January 1, 1982.

((~~D. In NR1, NR2, and NR3 zones, additions to a single-family dwelling unit existing on the effective date of the ordinance introduced as Council Bill 119544 may exceed the FAR limit in subsection 23.44.011.B.1 if the addition adds floor area equal to or less than 20 percent of the floor area that existed on the effective date of the ordinance introduced as Council Bill 119544. Only one addition to any single-family dwelling unit may be exempted under this subsection 23.44.011.D.~~))

Section 13. Section 23.44.012 of the Seattle Municipal Code, last amended by Ordinance 126600, is amended as follows:

23.44.012 Height limits

A. Maximum height established. The provisions of this Section 23.44.012 apply in neighborhood residential zones, except as provided elsewhere in the Land Use Code for specific types of structures or structures in particular locations.

((~~1. Except as provided in subsections 23.44.012.A.2 and 23.44.012.A.3, the~~)) <u>The</u> maximum permitted height for any structure not located in a required yard is ((~~30~~)) <u>32</u> feet.

((~~2. In NR1, NR2, and NR3 zones, the maximum permitted height for any structure on a lot 30 feet or less in width is 25 feet.~~

~~3. In NR1, NR2, and NR3 zones, for a lot or unit lot of any width, if the area of the largest rectangle or other quadrilateral that can be drawn within the lot lines of the lot or unit lot is less than 3,200 square feet the maximum permitted height for any structure on that lot shall be 18 feet. Additional height shall be allowed, subject to the limit that would otherwise apply under subsections 23.44.012.A.1 and 23.44.012.A.2, provided that the elevation at the top of the~~

~~exterior walls of the structure, exclusive of pitched roofs, does not exceed the average of the elevations at the tops of the walls of single-family residences on abutting lots within the same zone. The limit of this subsection 23.44.012.A.3 shall not apply to additions to single-family residences existing as of February 1, 2013, that do not exceed the greater of 1,000 square feet of new gross floor area or the amount of gross floor area on any one floor of the existing house.~~))

* * *

Section 14. Section 23.44.014 of the Seattle Municipal Code, last amended by the ordinance introduced as Council Bill 120949, is amended as follows:

23.44.014 Yards

A. General

1. Yards are required for every lot in a neighborhood residential zone.

2. In the case of a through lot, each yard abutting a street, except a side yard, shall be a front yard. Rear yard provisions shall not apply to the through lot, except pursuant to Section 23.40.030 or 23.40.035.

3. Setbacks from a street or alley may be required in order to meet the provisions of Section 23.53.015.

4. Setbacks from access easements may also be required for principal structures according to the standards in ((~~subsections 23.53.025.C.2 and 23.53.025.D.6~~)) subsection 23.53.025.C.6.

B. Required yards for neighborhood residential zones are shown in Table A for 23.44.014.

~~((Table A for 23.44.014~~
~~Required yards in neighborhood residential zones~~

~~Yard~~	~~NR1, NR2, and NR3~~	~~RSL~~
~~Front~~	~~20 feet or the average of the front yards of the single-family structures on either side, whichever is less[1]~~	~~10 feet~~
~~Rear~~	~~25 feet or 20 percent of lot depth, whichever is less, except that it may never be less than 10 feet[2]~~	~~10 feet except that, if the rear yard abuts an alley, there is no rear yard requirement~~
~~Side~~	~~5 feet [3, 4, 5]~~	~~5 feet[5]~~

~~Footnotes to Table A for 23.44.014~~

~~[1] If the natural gradient or slope (as measured from the front line of the lot for a distance of 60 feet or the full depth of the lot, whichever is less) is in excess of 35 percent, the required front yard depth shall be the lesser of: 20 feet less 1 foot for each one percent of gradient or slope in excess of 35 percent; or the average of the front yards on either side.~~

~~[2] If the rear lot line abuts an alley, the centerline of the alley between the side lot lines extended shall be assumed to be the rear lot line for purposes of the provision of rear yard and the determination of lot depth; provided, that at no point shall the principal structure be closer than 5 feet to the alley.~~

~~[3] In the case of a reversed corner lot, the key lot of which is in a neighborhood residential zone, the width of the side yard on the street side of the reversed corner lot shall not be less than 10 feet.~~

~~[4] If any side street lot line is a continuation of the front lot line of an abutting neighborhood residential zoned lot, whether or not separated by an alley, the width of the street side yard shall not be less than 10 feet.~~

~~[5] No side yard is required from a side lot line that abuts an alley.~~))

Table A for 23.44.014
Required yards in neighborhood residential zones

Front	Lots with one or two dwelling units: 15 feet;[1] Lots with three or more dwelling units: 10 feet [1]
Rear	Lots not abutting an alley with one or two dwelling units: 15 feet Lots not abutting an alley with three or more dwelling units: 10 feet Lots abutting an alley: no rear yard is required
Side	5 feet

Table A for 23.44.014
Required yards in neighborhood residential zones

Footnote for Table A for 23.44.090
[1] For lots abutting landmarked public right of way on Queen Anne Boulevard, front yards shall be 20 feet or the average of the front yards of the structures on abutting lots, whichever is less, except that if the natural gradient or slope (as measured from the front line of the lot for a distance of 60 feet or the full depth of the lot, whichever is less) is in excess of 35 percent, the required front yard depth shall be the lesser of: 20 feet less 1 foot for each one percent of gradient or slope in excess of 35 percent; or the average of the front yards on the abutting lots.

* * *

Section 15. Section 23.44.016 of the Seattle Municipal Code, last amended by the ordinance introduced as Council Bill 120949, is amended as follows:

23.44.016 Parking and garages

* * *

D. Parking and garages in required yards. Parking and garages are regulated as described in this subsection 23.44.016.D. Unless otherwise specified, the terms "garage" or "garages" as used in this subsection 23.44.016.D refer to both attached and detached garages.

1. Parking and garages shall not be located ((~~in the required front yard~~)) within 20 feet of a front lot line except as provided in subsections 23.44.016.D.6, 23.44.016.D.8, 23.44.016.D.9, 23.44.016.D.10, and 23.44.016.D.11.

2. Parking and garages shall not be located in a required side yard abutting a street or the first 10 feet of a required rear yard abutting a street except as provided in subsections 23.44.016.D.6, 23.44.016.D.8, 23.44.016.D.9, 23.44.016.D.10, and 23.44.016.D.11.

3. Garages shall not be located in a required side yard that abuts the rear or side yard of another lot or in that portion of the rear yard of a reversed corner lot within 5 feet of the key lot's side lot line unless:

a. The garage is a detached garage and extends only into that portion of a side yard that is either within 35 feet of the centerline of an alley or within 25 feet of any rear lot line that is not an alley lot line; or

b. An agreement between the owners of record of the abutting properties, authorizing the garage in that location, is executed and recorded, pursuant to subsection 23.44.014.C.2.a.

4. Garages with vehicular access facing an alley, shall not be located within 12 feet of the centerline of any alley, nor within 12 feet of any rear lot line that is not an alley lot line, except as provided in subsections 23.44.016.D.8, 23.44.016.D.9, 23.44.016.D.10, and 23.44.016.D.11, or the Director may waive or modify this standard as a Type I decision provided the applicant can demonstrate that adequate turning and maneuvering areas can be provided.

5. On a reversed corner lot, no garage shall be located in that portion of the required rear yard that abuts the required front yard of the adjoining key lot unless the provisions of subsection 23.44.016.D.8 apply.

6. If access to required parking passes through a required yard, automobiles, motorcycles, and similar vehicles may be parked on the open access located in a required yard.

7. Trailers, boats, recreational vehicles, and similar equipment shall not be parked in required front and side yards or the first 10 feet of a rear yard measured from the rear lot line, or measured 10 feet from the centerline of an alley if there is an alley adjacent to the rear lot line, unless fully enclosed in a structure otherwise allowed in a required yard by this subsection 23.44.016.D.

8. Lots with uphill yards abutting streets. In NR1, NR2, and NR3 zones, parking for one two-axle or one up to four-wheeled vehicle may be established in a required yard

abutting a street according to subsection 23.44.016.D.8.a or 23.44.016.D.8.b only if access to parking is permitted through that yard pursuant to subsection 23.44.016.B.

a. Open parking space

1) The existing grade of the lot slopes upward from the street lot line an average of at least 6 feet above sidewalk grade at a line that is 10 feet from the street lot line; and

2) The parking area shall be at least an average of 6 feet below the existing grade prior to excavation and/or construction at a line that is 10 feet from the street lot line; and

3) The parking space shall be no wider than 10 feet for one parking space at the parking surface and no wider than 20 feet for two parking spaces if permitted as provided in subsection 23.44.016.D.11.

b. Terraced garage

1) The height of a terraced garage is limited to no more than 2 feet above existing or finished grade, whichever is lower, for the portions of the garage that are 10 feet or more from the street lot line. The ridge of a pitched roof on a terraced garage may extend up to 3 feet above this 2-foot height limit. All parts of the roof above the 2-foot height limit shall be pitched at a rate of not less than 4:12. No portion of a shed roof shall be permitted to extend beyond the 2-foot height limit of this provision. Portions of a terraced garage that are less than 10 feet from the street lot line shall comply with the height standards in subsection 23.44.016.E.2;

2) The width of a terraced garage structure shall not exceed 14 feet for one two-axle or one up to four-wheeled vehicle, or 24 feet if permitted to have two two-axle or two up to four-wheeled vehicles as provided in subsection 23.44.016.D.11;

3) All above ground portions of the terraced garage shall be included in lot coverage; and

4) The roof of the terraced garage may be used as a deck and shall be considered to be a part of the garage structure even if it is a separate structure on top of the garage.

9. Lots with downhill yards abutting streets. In NR1, NR2, and NR3 zones, parking, either open or enclosed in an attached or detached garage, for one two-axle or one up to four-wheeled vehicle may be located in a required yard abutting a street if the following conditions are met:

a. The existing grade slopes downward from the street lot line that the parking faces;

b. For front yard parking, the lot has a vertical drop of at least 20 feet in the first 60 feet, measured along a line from the midpoint of the front lot line to the midpoint of the rear lot line;

c. Parking is not permitted in required side yards abutting a street;

d. Parking in a rear yard complies with subsections 23.44.016.D.2, 23.44.016.D.4, and 23.44.016.D.5; and

e. Access to parking is permitted through the required yard abutting the street by subsection 23.44.016.B.

10. Through lots. On through lots less than 125 feet in depth in NR1, NR2, and NR3 zones, parking, either open or enclosed in an attached or detached garage, for one two-axle or one up to four-wheeled vehicle may be located in one of the required front yards. The front yard in which the parking may be located shall be determined by the Director based on the

location of other garages or parking areas on the block. If no pattern of parking location can be determined, the Director shall determine in which yard the parking shall be located based on the prevailing character and setback patterns of the block.

11. Lots with uphill yards abutting streets or downhill or through lot front yards fronting on streets that prohibit parking. In NR1, NR2, and NR3 zones, parking for two two-axle or two up to four-wheeled vehicles may be located in uphill yards abutting streets or downhill or through lot front yards as provided in subsections 23.44.016.D.8, 23.44.016.D.9, or 23.44.016.D.10 if, in consultation with the Seattle Department of Transportation, it is found that uninterrupted parking for 24 hours is prohibited on at least one side of the street within 200 feet of the lot line over which access is proposed. The Director may authorize a curb cut wider than would be permitted under Section 23.54.030 if necessary, for access.

* * *

Section 16. Section 23.44.017 of the Seattle Municipal Code, last amended by the ordinance introduced as Council Bill 120949, is amended as follows:

23.44.017 Density limits

A. On lots in existence as of June 30, 2025, in ((~~In~~)) NR1, NR2, ((~~and~~)) NR3, and RSL zones, the following density limits apply, except as otherwise provided in subsections 23.44.017.B, 23.44.017.C and 23.44.017.D. For the purposes of this Section 23.44.017, "dwelling unit" includes both principal and accessory units.

1. Up to four dwelling units are permitted per lot.

2. Up to six dwelling units are permitted per lot within one-quarter mile walking distance of a major transit stop.

3. Up to six dwelling units are permitted per lot located more than one-quarter mile walking distance away from a major transit stop, provided that at least two affordable principal dwelling units are provided, and the following requirements are met:

((~~only one single-family dwelling unit is allowed per lot, except that accessory dwelling units may also be approved pursuant to Section 23.42.022, and except as approved as part of an administrative conditional use permit under Section 25.09.260, a clustered housing planned development under Section 23.44.024, or a planned residential development under Section 23.44.034.~~

~~B. The following provisions apply in RSL zones:~~

~~1. The minimum lot area per principal dwelling unit is 2,000 square feet.~~

~~2. Except as provided in subsection 23.44.017.B.3, when calculation of the number of principal dwelling units allowed according to subsection 23.44.017.B.1 results in a fraction of a unit, any fraction up to and including 0.85 constitutes zero additional principal dwelling units, and any fraction over 0.85 constitutes one additional principal dwelling unit.~~

~~3. For lots in existence on April 19, 2019, if the number of principal dwelling units allowed according to subsection 23.44.017.B.1 equals less than two, two units are allowed.~~

~~4. Accessory dwelling units are allowed pursuant to Section 23.42.022.~~))

a. A regulatory agreement, covenant, or other legal instrument, recorded on the title of the property and enforceable by the City of Seattle, ensures affordability for income-eligible households for 50 years in at least two principal dwelling units as follows:

1) For rental housing, restricted units serving households with incomes no higher than 60 percent of median income at initial occupancy and with rents not exceeding 30 percent of 60 percent of median income; or

2) For ownership housing, restricted units sold to households with incomes no higher than 80 percent of median income at prices (initial sale and resale) that allow modest growth in homeowner equity while maintaining long-term affordability for income-eligible buyers, as determined by the Director of Housing;

b. The low-income units must be generally distributed throughout the development and have substantially the same functionality as unrestricted units in the development;

c. To the extent practicable, the low-income units must be comparable to the unrestricted units in terms of square footage and number of bedrooms and bathrooms;

d. Tenure (i.e., rental or ownership) of low-income units and unrestricted units must be the same;

e. The regulatory agreement, covenant, or other legal instrument must contain criteria and policies to maintain public benefit if the property is demolished or converted to a non-residential use;

f. For ownership developments, the low-income units must be stewarded by a qualified non-profit organization including:

1). Pre-purchase verification of income and other requirements for eligible households, affordable sale price calculations for approval by the Office of Housing, and execution of legal restrictions on the property; and

2). Post-purchase support for homeowners by facilitating resales, monitoring compliance with financial, owner occupancy, and other legal requirements, and clear communication of program guidelines and restrictions;

g. For purposes of this subsection 23.44.017.A.3, qualified non-profit organization means a non-profit organization that the Office of Housing determines as experienced in the development and stewardship of permanently affordable homes;

h. At such times as may be required by the Director of Housing but no less than annually, the property owner for rental housing or the qualified non-profit organization for ownership housing must file property reports with the Office of Housing, verified upon oath or affirmation, which shall contain such information as the Office of Housing may deem necessary to determine compliance with this subsection 23.44.017.A.3 and the regulatory agreement, covenant, or legal instrument according to subsection 23.44.017.A.3.a; and

i. In RSL zones that have a mandatory housing affordability suffix, the dwelling units for which the regulatory agreement, covenant, or other legal instrument required by subsection 23.44.017.A.3.a ensures affordability as required by that subsection shall be counted towards any obligation to provide MHA-R units according to subsection 23.58C.050.A.

B. The following provisions apply in RSL zones:

1. The minimum lot area per principal dwelling unit is 2,000 square feet.

2. The number of dwelling units allowed on a lot existing as of June 30, 2025, is the greater of the number dwelling units allowed by subsection 23.44.017.A or subsection 23.44.017.B.1.

3. Accessory dwelling units are allowed pursuant to Section 23.42.022.

C. For lots, other than unit lots, created after June 30, 2025, the following provisions apply:

1. In NR1, NR2, and NR3 zones, only one single-family dwelling unit is allowed per lot.

2. In RSL zones, the minimum lot area per principal dwelling unit is 2,000 square feet.

3. Accessory dwelling units are allowed pursuant to Section 23.42.022.

D. Lot density exceptions for lots that contain any riparian corridors; wetlands and their buffers; submerged lands and areas within the shoreline setback; or designated non-disturbance area in steep slopes. For lots that contain any riparian corridors, wetlands and their buffers, submerged lands and areas within the shoreline setback, or designated non-disturbance area in steep slopes, applicants may choose to develop the lot with the number of dwelling units provided in the density limits in subsections 23.44.017.A and 23.44.017.B or with the number of principal and accessory dwelling units calculated as follows:

1. Determine the number of units that would be allowed under subsection 23.44.017.A if no environmentally critical areas were located on the lot;

2. Determine the percentage of the lot that is not covered by riparian corridors, wetlands and their buffers, submerged lands and areas within the shoreline setback, or designated non-disturbance area in steep slopes; and

3. Calculate the number of dwelling units by multiplying the number of dwelling units determined in subsection 23.44.017.D.1 by the percentage of the lot calculated in subsection 23.44.017.D.2.

E. For the purpose of this Section 23.44.017, "designated non-disturbance area" in steep slopes shall include all portions of steep slope hazard areas except the following:

1. Areas that are granted relief from the prohibition of development according to Section 25.09.090;

2. Areas where development is allowed under a small project waiver according to Section 25.09.090;

3. Areas where development is allowed under an administrative conditional use according to Section 25.09.260; and

4. Areas where intrusion into the steep slope erosion hazard area and buffer is allowed by steep slope erosion hazard area variance according to Section 25.09.290.

F. Measurement of minimum lot size and maximum density

1. When calculation of the number of dwelling units allowed results in a fraction of a unit, any fraction over 0.85 constitutes one additional unit.

2. Congregate residence sleeping rooms shall be treated as one-fourth of a dwelling unit for purposes of calculating density.

3. In the case of a development within a unit lot subdivision, the density limit shall be applied to the parent lot as a whole.

4. If dedication of right-of-way is required, permitted density shall be calculated before the dedication is made.

Section 17. Section 23.44.044 of the Seattle Municipal Code, last amended by Ordinance 124378, is amended as follows:

23.44.044 Swimming pools

Private, permanent swimming pools, hot tubs and other similar uses are permitted as accessory uses to a ((~~single-family~~)) residential structure subject to the following specific development standards:

A. Private, permanent swimming pools, hot tubs and other similar uses over 18 inches above existing grade are subject to the development standards for accessory uses.

B. Private, permanent swimming pools, hot tubs and other similar uses projecting not more than 18 inches above existing grade shall not be counted in lot coverage.

C. Private, permanent swimming pools, hot tubs and other similar uses may be placed in a required front or rear yard, provided that:

1. No part of the structure shall project more than 18 inches above existing lot grade in a required front yard; and

2. No part of the structure shall be placed closer than 5 feet to any front or side lot line.

Section 18. Section 23.45.512 of the Seattle Municipal Code, last amended by the ordinance introduced as Council Bill 120949, is amended as follows:

23.45.512 Density limits and ((~~family-size unit requirements~~)) <u>minimum lot size</u> —LR zones

A. ((~~Density limits~~)) <u>There is no density limit for residential development in LR zones, except that in LR1 zones for rowhouse development on interior lots, all townhouse development, and all single-family dwelling units, and for all residential development in all LR zones that do not have a mandatory housing affordability suffix, the number of dwelling units allowed on a lot is the greater of the number of dwelling units allowed under subsections 23.45.512.B or 23.45.512.C.</u>

~~1. Except according to subsection 23.45.512.A.4, the following developments must meet the density limits described in this subsection 23.45.512.A:~~

~~a. In LR1 zones, rowhouse development on interior lots and all townhouse development; and~~

~~b. All development in Lowrise zones that do not have a mandatory housing affordability suffix.~~

B. Rowhouse development on interior lots, all townhouse development and all single-family dwelling units in LR1 zones, and all residential development in LR zones that do not have a mandatory housing affordability suffix shall not exceed a density of one principal dwelling unit per 1,150 square feet of lot area; except((~~, except that apartments in LR3 zones that do not have a mandatory housing affordability suffix shall not exceed a density limit of one principal dwelling unit per 800 square feet.~~

~~3. When density calculations result in a fraction of a unit, any fraction up to and including 0.85 constitutes zero additional units, and any fraction over 0.85 constitutes one additional principal dwelling unit.~~

~~4. Low~~)) low-income housing shall have a maximum density of one principal dwelling unit per 400 square feet of lot area.

((~~B. Family-sized unit requirements in LR1 zones~~

~~1. Apartment developments in LR1 zones with four or more principal dwelling units shall provide at least one unit with two or more bedrooms and a minimum net unit area of 850 square feet for every four principal dwelling units in the structure.~~

~~2. One unit with three or more bedrooms and a minimum net unit area of 1,050 square feet may be provided in place of any two principal dwelling units required to include two bedrooms and a minimum net unit area of 850 square feet.~~))

C. Alternative Density Limits. Rowhouse development on interior lots, all townhouse development and all single-family dwelling units in LR1 zones and all residential development in LR zones that do not have a mandatory housing affordability suffix may include the number of dwelling units permitted under subsection 23.45.512.C.1 or 23.45.512.C.2, as applicable.

For the purposes of this subsection 23.45.512.C, dwelling units include both principal and accessory dwelling units.

1. Permitted densities. The following density limits apply on lots that do not contain any riparian corridors, any wetlands or their buffers, any submerged lands or areas within the shoreline setback, or designated non-disturbance area in steep slopes:

a. Up to four dwelling units are permitted on lots existing as of June 30, 2025.

b. Up to six dwelling units are permitted on all lots existing as of June 30, 2025 that are located within one-quarter mile walking distance of a major transit stop.

c. Up to six dwelling units are allowed on a lot existing as of June 30, 2025 provided that:

((~~Nursing homes, congregate housing, assisted living facilities, and accessory dwelling units that meet the standards of Section 23.42.022 are exempt from the density limit set in subsection 23.45.512.A and the requirements in subsection 23.45.512.B.~~

~~D. Dwelling unit(s) located in structures built prior to January 1, 1982, as single-family dwelling units that will remain in residential use are exempt from density~~ ~~limits.~~

~~E. If dedication of right-of-way is required, permitted density shall be calculated before the dedication is made.~~))

1). A regulatory agreement, covenant, or other legal instrument, recorded on the title of the property and enforceable by The City of Seattle, ensures affordability for income-eligible households for 50 years in at least two principal dwelling units as follows:

a) For rental housing, restricted units serving households with incomes no higher than 60 percent of median income at initial occupancy and with rents not exceeding 30 percent of 60 percent of median income; or

b) For ownership housing, restricted units sold to households with incomes no higher than 80 percent of median income at prices (initial sale and resale) that allow modest growth in homeowner equity while maintaining long-term affordability for income-eligible buyers, all as determined by the Director of Housing;

2) The low-income units must be generally distributed throughout the development and have substantially the same functionality as unrestricted units in the development;

3) To the extent practicable, the low-income units must be comparable to unrestricted units in terms of square footage and number of bedrooms and bathrooms;

4) Tenure (i.e., rental or ownership) of low-income units and unrestricted units must be the same;

5) The regulatory agreement, covenant, or other legal instrument must contain criteria and policies to maintain public benefit if the property is demolished or converted to a non-residential use;

6) For ownership developments, the low-income units must be stewarded by a qualified non-profit organization including:

a) Pre-purchase verification of income and other requirements for eligible households, affordable sale price calculations for approval by the Office of Housing, and execution of legal restrictions on the property; and

b) Post-purchase support for homeowners by facilitating resales, monitoring compliance with financial, owner occupancy, and other legal requirements, and clear communication of program guidelines and restrictions;

7) For purposes of this subsection 23.45.512.C.5, qualified non-profit organization means a non-profit organization that the Office of Housing determines as experienced in the development and stewardship of permanently affordable homes;

8) At such times as may be required by the Director of Housing but no less than annually, the property owner for rental housing or the qualified non-profit organization for ownership housing must file property reports with the Office of Housing, verified upon oath or affirmation, which shall contain such information as the Office of Housing may deem necessary to determine compliance with this subsection 23.45.512.C.1.c and the regulatory agreement, covenant, or legal instrument according to subsection 23.45.512.C.1.c.1; and

9) In zones that have a mandatory housing affordability suffix, the dwelling units for which the regulatory agreement, covenant, or other legal instrument required by subsection 23.45.512.C.1.c.1 ensures affordability as required by that subsection shall be counted towards any obligation to provide MHA-R units according to subsection 23.58C.050.A.

2. For lots that contain any riparian corridors, wetlands and their buffers, submerged lands and areas within the shoreline setback, or designated non-disturbance area in steep slopes, applicants may choose the density limits in subsection 23.45.512.B or develop the lot with the number of principal and accessory dwelling units as follows:

a. Determine the number of dwelling units that would be allowed under subsection 23.45.512.C.1 if no environmentally critical areas were located on the lot;

b. Determine the percentage of the lot that is not covered by riparian corridors, wetlands and their buffers, submerged lands and areas within the shoreline setback, or designated non-disturbance area in steep slopes;

c. Calculate the number of permitted dwelling units by multiplying the number of units determined in subsection 23.45.512.C.2.a by the percentage of the lot calculated in subsection 23.45.512.C.2.b.

((~~F.~~)) D. Adding units to existing structures

1. One additional principal dwelling unit may be added to an existing residential structure regardless of the density restrictions in subsection 23.45.512.B or 23.45.512.C ((~~and the requirements in subsection 23.45.512.B~~)). An additional principal dwelling unit is allowed only if the proposed additional unit is to be located entirely within an existing structure, and no additional floor area to accommodate the new unit is proposed to be added to the existing structure.

2. For the purposes of this subsection ((~~23.45.512.F~~)) 23.45.512.D, "existing residential structures" are those that were established under permit as of October 31, 2001, or for which a permit has been granted and the permit has not expired as of October 31, 2001.

E. Measurement of minimum lot size and maximum density

1. When density calculations result in a fraction of a unit, any fraction up to and including 0.85 constitutes zero additional units, and any fraction over 0.85 constitutes one additional unit.

2. If dedication of right-of-way is required, permitted density shall be calculated before the dedication is made.

3. In the case of a development within a unit lot subdivision, the density limit shall be applied to the parent lot as a whole.

4. When calculating maximum density, the number of dwelling units shall include accessory dwelling units and principal dwelling units.

F. For the purpose of this Section 23.45.512, "designated non-disturbance area in steep slopes" shall include all portions of steep slope hazard areas except the following:

1. Areas that are granted relief from the prohibition of development according to Section 25.09.090;

2. Areas where development is allowed under a small project waiver according to Section 25.09.090;

3. Areas where development is allowed under an administrative conditional use according to Section 25.09.260; and

4. Areas where intrusion into the steep slope erosion hazard area and buffer is allowed by steep slope erosion hazard area variance according to Section 25.09.290.

G. Exception to Density Limits. Dwelling unit(s) located in structures built prior to January 1, 1982 that will remain in residential use are exempt from the density limit described in subsections 23.45.512.B and 23.45.512.C.

H. The minimum lot size for lots created through a subdivision process is the lot size necessary to allow a density of one principal dwelling unit.

Section 19. Section 23.45.514 of the Seattle Municipal Code, last amended by the ordinance introduced as Council Bill 120949, is amended as follows:

23.45.514 Structure height

A. Subject to the additions and exceptions allowed as set forth in this Section 23.45.514, the height limits for structures in LR zones are as shown on Table A for 23.45.514.

Table A for 23.45.514
Structure height for LR zones (in feet)

Housing type	LR1	LR2	LR3 outside urban centers, urban villages, and Station Area Overlay Districts	LR3 in urban centers, urban villages, and Station Area Overlay Districts
Cottage housing developments	22	22	22	22
Rowhouse and townhouse developments	((~~30~~)) 32	40 [1]	40 [1]	50 [1]
Apartments	((~~30~~)) 32	40 [1]	40 [1]	50 [2]

Footnotes for Table A for 23.45.514
[1] Except that the height limit is ((~~30~~)) 32 feet in zones without a mandatory housing affordability suffix.
[2] Except that the height limit is 40 feet in zones without a mandatory housing affordability suffix.

* * *

Section 20. Section 23.45.518 of the Seattle Municipal Code, last amended by Ordinance 126685, is amended as follows:

23.45.518 Setbacks ((~~and separations~~))

A. LR zones

1. Required setbacks for the LR zones are as shown in Table A for 23.45.518 and subsection 23.45.518.A.2.

((~~Table A for 23.45.518~~
~~Required setbacks in LR zones measured in feet~~

~~All LR zones~~	**~~Category of residential use~~**			
~~Setback~~	**~~Cottage housing developments and single-family dwelling units~~**	**~~Rowhouse developments~~**	**~~Townhouse developments~~**	**~~Apartments~~**
~~Front~~	~~7 average; 5 minimum~~	~~5 minimum~~	~~7 average; 5 minimum~~	~~5 minimum~~
~~Rear~~	~~0 with alley; 7 if no alley~~	~~0 with alley; With no alley: 7 average; 5 minimum~~	~~7 average; 5 minimum~~	~~10 minimum with alley; 15 minimum if no alley~~
~~Side setback for facades 40 feet or less in length [1]~~	~~5~~	~~0 where abutting another rowhouse development [2]; otherwise 3.5, except that on side lot lines that abut a neighborhood residential zone, the setback is 5~~	~~5~~	~~5~~
~~Side setback for facades greater than 40 feet in length [3]~~	~~5 minimum~~	~~0 where abutting another rowhouse development [2]; otherwise 3.5, except that on side lot lines that abut a neighborhood residential zone, the setback is 7 average; 5 minimum~~	~~7 average; 5 minimum~~	~~7 average; 5 minimum~~

~~Footnotes to Table A for 23.45.518~~
~~[1] Additions to existing nonconforming structures built prior to April 11, 2011, shall be set back a sufficient distance so that the addition complies with setback standards. For any portion of a structure built before April 11, 2011, the average setback applies only to a new addition built~~

~~((Table A for 23.45.518~~
~~Required setbacks in LR zones measured in feet~~

~~All LR zones~~	~~Category of residential use~~

~~after that date. If an addition is to a side wall extended vertically, the existing side wall line may be continued by the addition, provided that the average setback of 7 feet or the 5-foot minimum setback is met.~~
~~[2] If the side facades of rowhouse developments on abutting lots are not joined, then a 3.5-foot setback is required, except the side setback may be reduced to zero if the abutting lot contains a rowhouse development and an easement is provided along the shared lot line of the abutting lot sufficient to leave a 3.5-foot separation between the principal structures of the abutting rowhouse developments.~~
~~[3] Portions of structures that qualify for the FAR exemption in subsection 23.45.510.D.5 are not considered part of the facade length for the purposes of determining the side setback requirement.~~))

Table A for 23.45.518
Required setbacks in LR zones

Front	7 feet average, 5 feet minimum
Rear	If rear lot line abuts an alley, 0 feet Otherwise, 7 feet average, 5 feet minimum
Side	5 feet

2. Upper-level setbacks in LR2 and LR3 zones

a. An upper-level setback of 12 feet from the front lot line is required for all portions of a structure above the following height:

1) Forty-four feet for zones with a height limit of 40 feet; and

2) Fifty-four feet for zones with a height limit of 50 feet.

b. An upper-level setback of 12 feet from each side or rear lot line that abuts a lot zoned ((~~single-family~~)) neighborhood residential is required for all portions of the structure above 34 feet in height.

c. Projections allowed in subsection 23.45.518.H are allowed in upper-level setbacks.

d. Structures allowed in subsection 23.45.518.I are not allowed in upper-level setbacks.

e. Rooftop features are not allowed in upper-level setback except as follows:

1) A pitched roof, other than a shed roof or butterfly roof, is allowed in the upper-level setback if all parts of the roof are pitched at a rate of not less than 6:12 and not more than 12:12.

2) Open railings may extend up to 4 feet above the height at which the setback begins.

3) Parapets may extend up to 2 feet above the height at which the setback begins.

* * *

F. Separations between multiple structures

1. In LR and MR zones, the minimum required separation between principal structures at any two points on different interior facades is 10 feet, except for cottage housing developments, and principal structures separated by a driveway or parking aisle.

2. In LR and MR zones, if principal structures are separated by a driveway or parking aisle, the minimum required separation between the principal structures is 2 feet greater than the required width of the driveway or parking aisle, provided that the separation is not required to be any greater than 24 feet. If principal structures are separated by a driveway

or parking aisle, projections that enclose floor area may extend a maximum of 3 feet into the required separation if they are at least 8 feet above finished grade.

((~~3. Cottage housing developments in LR and MR zones:~~

~~a. The minimum required separation between principal structures at any two points on different interior facades is 6 feet, unless there is a principal entrance on an interior facade, in which case the minimum separation required from that facade is 10 feet.~~

~~b. Facades of principal structures shall be separated from facades of accessory structures by a minimum of 3 feet.~~))

* * *

J. Exceptions for existing ((~~single-family~~)) structures

1. In all multifamily zones, certain additions to a ((~~single-family dwelling unit~~)) residential structure may extend into a required side setback if the structure is already nonconforming with respect to that setback, and if the presently nonconforming section is at least 60 percent of the total width of the respective facade of the structure prior to the addition. The line formed by the nonconforming wall of the structure shall be the limit to which any additions may be built, which may extend up to the height limit and may include basement additions (Exhibit D for 23.45.518), provided that additions shall be at least 3 feet from the side lot line.

2. An existing single-family dwelling unit in a LR zone may be converted to a multifamily use without conforming to setback standards ((~~for apartments~~)) in subsection 23.45.518.A, provided that the building envelope is not changed. For the purposes of this subsection 23.45.518.J.2, "existing single-family dwelling unit" is one that was established

under permit as of October 31, 2001, or for which a permit has been granted and the permit has not expired on October 31, 2001.

* * *

Section 21. Section 23.45.522 of the Seattle Municipal Code, last amended by Ordinance 126157, is amended as follows:

23.45.522 Amenity area

A. Amount of amenity area ((~~required for rowhouse and townhouse developments and apartments in LR zones~~))

1. The required amount of amenity area ((~~for rowhouse and townhouse developments and apartments~~)) in LR zones is equal to 25 percent of the lot area.

((~~2. A minimum of 50 percent of the required amenity area shall be provided at ground level, except that amenity area provided on the roof of a structure that meets the provisions of subsection 23.45.510.D.5 may be counted as amenity area provided at ground level.~~

~~3. For rowhouse and townhouse developments, amenity area required at ground level may be provided as either private or common space.~~

~~4. For apartments, amenity area required at ground level shall be provided as common space.~~))

2. In LR zones, a minimum of 50 percent of the required amenity area shall be provided at ground level or within 4 feet of existing grade.

((~~B. Amenity area requirements for cottage housing developments in all multi-family zones~~

~~1. A minimum of 300 square feet of amenity area is required for each cottage.~~

~~2. A minimum of 150 square feet of amenity area is required for each carriage house.~~

~~3. The required quantity shall be allocated as follows:~~

~~a. Half of the amenity area required for each cottage, and all of the amenity area required for each carriage house, shall be provided as common amenity area; and~~

~~b. Half of the amenity area required for each cottage shall be provided as private amenity area for that unit.~~

~~4. The required common amenity area may be divided into no more than two separate areas and shall:~~

~~a. have cottages or carriage houses abutting on at least two sides;~~

~~b. be in a location central to the cottage housing development; and~~

~~c. have no horizontal dimension of less than 10 feet.~~

~~5. Carriage houses shall have stairs that provide access to the common amenity area.~~

~~C. Amount of amenity area required in MR and HR zones.~~)) The required amount of amenity area in MR and HR zones is equal to ((~~5~~)) five percent of the total gross floor area of a residential structure ((~~in residential use, except that cottage housing developments shall meet the standards in subsection 23.45.522.B.~~

~~D.~~)) B. General requirements. Required amenity areas shall meet the following conditions:

1. All units shall have access to a common or private amenity area.

2. Enclosed amenity areas

a. In LR zones, an amenity area shall not be enclosed within a structure.

b. In MR and HR zones, ((~~except for cottage housing,~~)) no more than 50 percent of the amenity area may be enclosed, and this enclosed area shall be provided as common amenity area.

3. Projections into amenity areas. Structural projections that do not provide floor area, such as garden windows, may extend up to 2 feet into an amenity area if they are at least 8 feet above finished grade.

4. Private amenity areas

a. There is no minimum dimension for private amenity areas, except that if a private amenity area is located between the structure and a side lot line that is not a side street lot line, the minimum horizontal dimension shall be measured from the side lot line and is required to be a minimum of 10 feet.

b. An unenclosed porch that is a minimum of 60 square feet in size and that faces a street or a common amenity area may be counted as part of the private amenity area for the ((~~rowhouse, townhouse, or cottage~~)) residential structure to which it is attached.

5. Common amenity areas ((~~for rowhouse and townhouse developments and apartments~~)) shall meet the following conditions:

a. No common amenity area shall be less than 250 square feet in area, and common amenity areas shall have a minimum horizontal dimension of 10 feet.

b. Common amenity areas shall be improved as follows:

1) At least 50 percent of a common amenity area provided at ground level shall be landscaped with grass, ground cover, bushes, bioretention facilities, and/or trees.

2) Elements that enhance the usability and livability of the space for residents, such as seating, outdoor lighting, weather protection, art, or other similar features, shall be provided.

c. The common amenity area ((~~required~~)) at ground level ((~~for apartments~~)) shall be accessible to all ((~~apartment~~)) dwelling units.

6. Parking areas, vehicular access easements, and driveways do not qualify as amenity areas, except that a woonerf may provide a maximum of 50 percent of the amenity area if the design of the woonerf is approved through a design review process pursuant to Chapter 23.41.

7. Swimming pools, spas, and hot tubs may be counted toward meeting the amenity area requirement.

8. Rooftop areas excluded because they are near minor communication utilities and accessory communication devices, pursuant to subsection 23.57.011.C.1, do not qualify as amenity areas.

((~~E.~~)) C. No amenity area is required for ((~~a~~)) one dwelling unit added to a ((~~single-family dwelling unit~~)) residential structure existing as of January 1, 1982, ((~~or for one new dwelling unit added to a multifamily residential use existing as of October 10, 2001~~)) provided that no dwelling units have been added since that date.

Section 22. Section 23.45.527 of the Seattle Municipal Code, last amended by Ordinance 126509, is amended as follows:

23.45.527 Structure width and façade length limits in LR zones

A. Structure width in LR zones may not exceed ((~~the width indicated on Table A for 23.45.527~~)) 90 feet in LR1 and LR2 zones and 150 feet in LR3 zones.

((~~Table A for 23.45.527: Maximum Structure Width in LR zones in feet~~

~~Zone~~	~~Width in feet by Category of Residential Use~~		
	~~Cottage Housing and Rowhouse Developments~~	~~Townhouse Developments~~	~~Apartments~~
~~LR1~~	~~No limit~~	~~60~~	~~45~~
~~LR2~~	~~No limit~~	~~90~~	~~90~~
~~LR3 outside Urban Villages, Urban Centers or Station Area Overlay Districts~~	~~No limit~~	~~120~~	~~120~~
~~LR3 inside Urban Villages, Urban Centers or Station Area Overlay Districts~~	~~No limit~~	~~150~~	~~150~~))

B. Maximum façade length in Lowrise zones. ((~~1.~~)) The maximum combined length of all portions of façades within 15 feet of a lot line that is neither a rear lot line nor a street or alley lot line shall not exceed 65 percent of the length of that lot line((~~, except as specified in subsection 23.45.527.B.2.~~

~~2. For a rowhouse development on a lot that abuts the side lot line of a lot in a neighborhood residential zone, the maximum combined length of all portions of façades within 15 feet of the abutting side lot line is 40 feet~~)).

Section 23. Section 23.45.529 of the Seattle Municipal Code, last amended by Ordinance 127099, is amended as follows:

23.45.529 Design standards

A. Intent. The intent of the design standards in this Section 23.45.529 is to:

1. Enhance street-facing and side facades to provide visual interest, promote new development that contributes to an attractive streetscape, and avoid the appearance of blank walls along a street or adjacent residential property;

2. Foster a sense of community by integrating new pedestrian-oriented multifamily development with the neighborhood street environment and promoting designs that allow easy surveillance of the street by area residents;

3. Promote livability in multifamily areas by providing a sense of openness and access to light and air; and

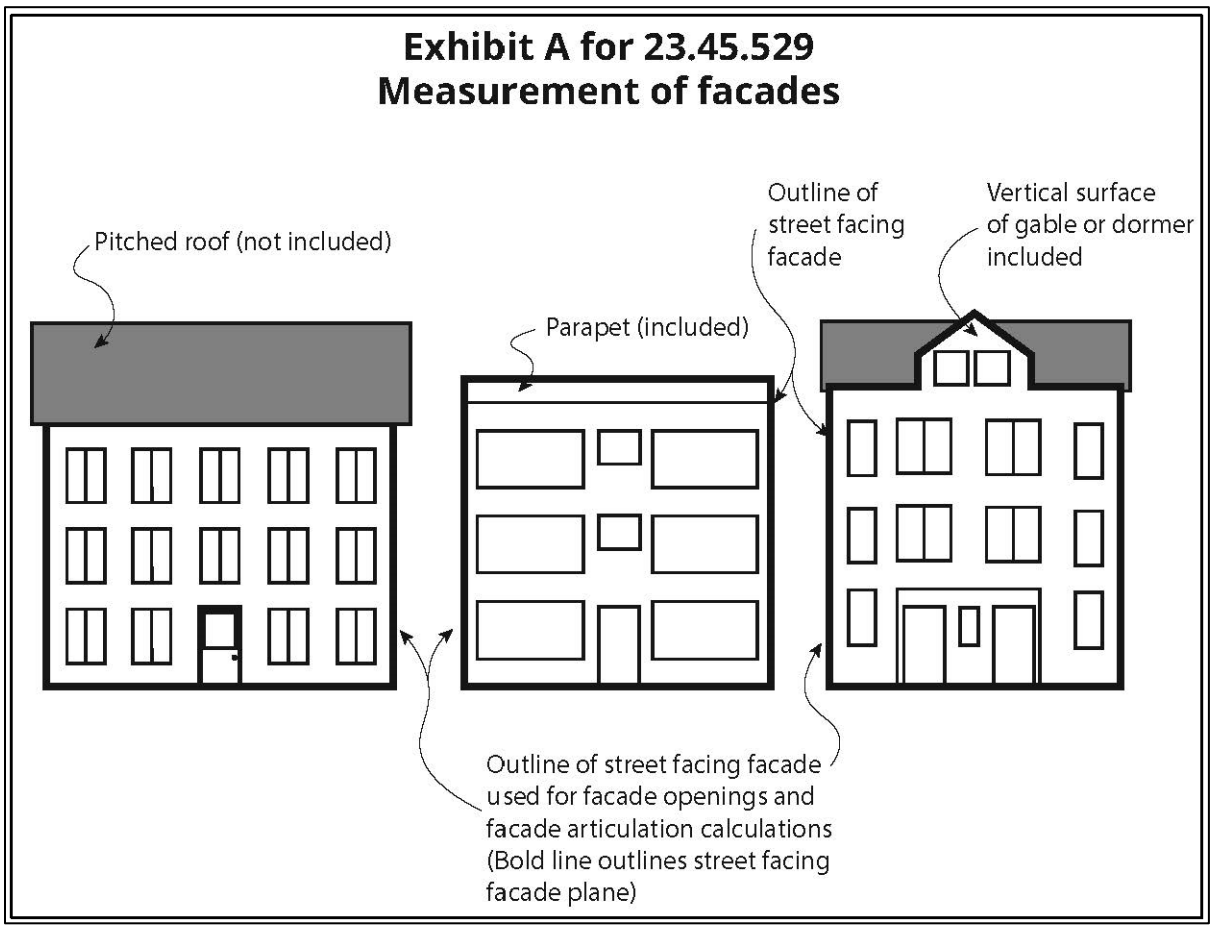
4. Encourage the compatibility of a variety of housing types with the scale and character of neighborhoods where new multifamily development occurs.

B. Application of provisions. The provisions of this Section 23.45.529 apply to all residential uses that do not undergo any type of design review pursuant to Chapter 23.41((~~, except single-family dwelling units~~)).

C. Treatment of street-facing facades. For the purposes of this subsection 23.45.529.C, a street-facing facade includes all vertical surfaces enclosing interior space, including gables and dormers, as shown in Exhibit A for 23.45.529.

Exhibit A for 23.45.529

Measurement of facades



((~~1.~~)) D. Facade openings

((~~a.~~)) 1. At least 20 percent of the area of each street-facing facade shall consist of windows and/or doors, except as provided in subsection ((~~23.45.529.C.1.b~~)) 23.45.529.D.2. If a front and side facade are street-facing, the two facades may be combined for the purpose of this calculation.

((~~b.~~)) 2. For any rowhouse or townhouse dwelling unit that has both a front and a side facade that are street-facing, the percentage of the side street-facing facade required to consist of windows and/or doors is reduced to ten percent for the portion of the facade

associated with that dwelling unit. This reduction to ten percent is not allowed if the facades are combined for the purpose of this standard pursuant to subsection ((~~23.45.529.C.1.a~~)) 23.45.529.D.1 ((~~or if any of the exceptions in subsection 23.45.529.C.3 are applied~~)).

((~~c.~~)) 3. Windows count toward the requirement for facade openings in this subsection ((~~23.45.529.C.1~~)) 23.45.529.D only if they are transparent. Windows composed of glass blocks or opaque glass, garage doors, and doors to utility and service areas do not count.

((~~2. Facade articulation~~

~~a. If a street-facing facade or portion of a street-facing facade is not vertical, the Director shall determine whether the facade is substantially vertical and required to comply with this subsection 23.45.529.C.~~

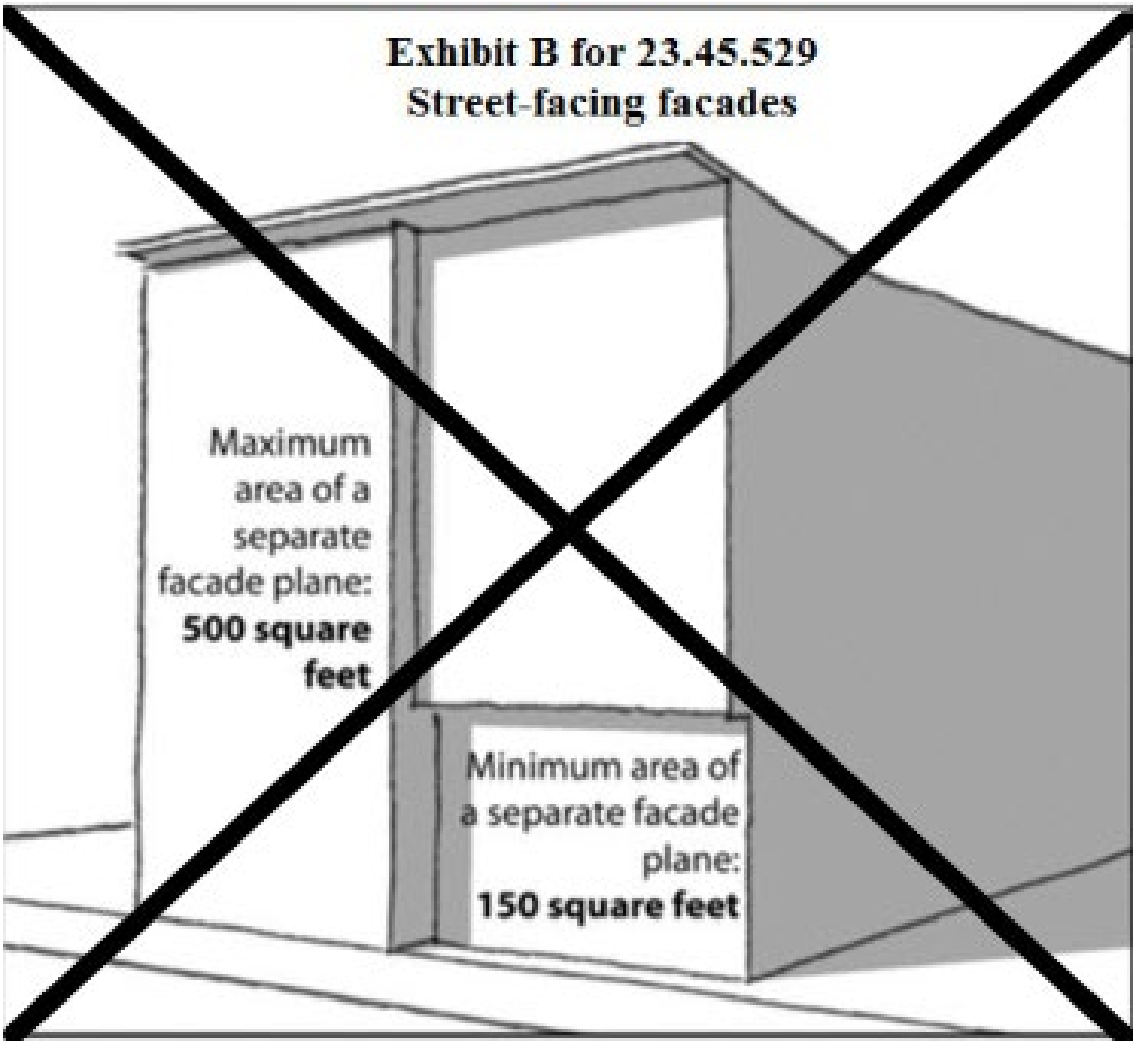
~~b. If the street-facing facade of a structure exceeds 750 square feet in area, division of the facade into separate facade planes is required (see Exhibit B for 23.45.529).~~

~~c. In order to be considered a separate facade plane for the purposes of this subsection 23.45.529.C.2, a portion of the street-facing facade shall have a minimum area of 150 square feet and a maximum area of 500 square feet, and shall project or be recessed from abutting facade planes by a minimum depth of 18 inches.~~

~~d. Trim that is a minimum of 0.75 inches deep and 3.5 inches wide is required to mark roof lines, porches, windows, and doors on all street-facing facades.~~

~~**Exhibit B for 23.45.529**~~

~~**Street-facing facades**~~



~~3. The Director may allow exceptions to the facade opening requirements in subsection 23.45.529.C.1 and the facade articulation requirements in subsection 23.45.529.C.2, if the Director determines that the street-facing facade will meet the intent of subsection 23.45.529.A.1 for all housing types, and, as applicable, the intent of subsections 23.45.529.E.2, 23.45.529.F.3, and 23.45.529.G.4 for cottage housing developments, rowhouse developments, and townhouse developments, respectively, through one or more of the following street-facing facade treatments:~~

~~a. Variations in building materials and/or color, or both, that reflect the stacking of stories or reinforce the articulation of the facade;~~

~~b. Incorporation of architectural features that add interest and dimension to the facade, such as porches, bay windows, chimneys, pilasters, columns, cornices, and/or balconies;~~

~~c. Special landscaping elements provided to meet Green Factor requirements pursuant to Section 23.45.524, such as trellises, that accommodate vegetated walls covering a minimum of 25 percent of the facade surface;~~

~~d. Special fenestration treatment, including an increase in the percentage of windows and doors to at least 25 percent of the street-facing facade(s).~~))

((~~D.~~)) E. Treatment of side facades that are not street-facing. For the purposes of this subsection 23.45.529.D, a side facade that is not street-facing includes all vertical surfaces enclosing interior space, including gables and dormers, as shown in Exhibit A for 23.45.529, if located within 10 feet of a side lot line. ((~~1.~~)) If the side facade of a structure that is not street-facing exceeds 1,000 square feet in area, one of the following must be met:

((~~a.~~)) 1. A portion of the side facade with a minimum area of 250 square feet and a maximum area of 750 square feet shall project or be recessed from abutting facade planes by a minimum depth of 18 inches; or

((~~b.~~)) 2. The side facade shall include vertical or horizontal variations in building materials or color, covering a minimum of 25 percent of the facade surface.

((~~2. Structures shall be designed to maintain the privacy of dwelling units by minimizing placement of proposed windows where they would directly align with windows on the side facade of a structure on an abutting lot located within 20 feet of the side property line~~

~~or by use of fencing, screening, landscaping, or translucent windows to create privacy between buildings.~~

~~E. Design standards for cottage housing developments~~

~~1. Pedestrian entry. Each cottage with a street-facing facade that is located within 10 feet of the street lot line shall have a visually prominent pedestrian entry through the use of covered stoops, porches, or other architectural entry features. For cottages on corner lots that have more than one street-facing facade within 10 feet of the street lot line, a visually prominent pedestrian entry is required on only one of the street-facing facades. Access to these entrances may be through a required private amenity area that abuts the street.~~

~~2. Architectural expression. Cottage housing developments shall include architectural details that reduce the visual scale of the units. Each cottage shall employ one or more of the following design techniques to reduce visual scale of the units:~~

~~a. Attached covered porch;~~

~~b. Roofline features such as dormers or clerestories;~~

~~c. Bay windows;~~

~~d. Variation in siding texture and materials; and~~

~~e. Other appropriate architectural techniques demonstrated by the applicant to reduce the visual scale of cottages.~~

~~F. Design standards for rowhouse developments~~

~~1. Pedestrian entry. Each rowhouse unit shall have a pedestrian entry on the street-facing facade that is designed to be visually prominent through the use of covered stoops, porches, or other architectural entry features. For rowhouse units on corner lots, a visually prominent pedestrian entry is required on only one of the street-facing facades.~~

~~2. Front setback. Design elements to provide a transition between the street and the rowhouse units, such as landscaping, trees, fences, or other similar features, are required in the front setback.~~

~~3. Architectural expression. The street-facing facade of a rowhouse unit shall provide architectural detail or composition to visually identify each individual rowhouse unit as seen from the street. Design elements such as trim or molding, modulation, massing, color and material variation, or other similar features may be used to achieve visual identification of individual units. Rooftop features, such as dormers or clerestories, or roofline variation may be used to visually identify individual rowhouse units.~~

~~G. Design standards for townhouse developments~~

~~1. Building orientation. Townhouse developments shall maximize the orientation of individual units to the street by complying with one of the following conditions:~~

~~a. When multiple buildings are located on a lot, at least 50 percent of the townhouse units shall be located so that there is no intervening principal structure between the unit and the street, unless the intervening principal structure was established under permit as of October 31, 2001, or was granted a permit on October 31, 2001, and the permit has not expired; or~~

~~b. All townhouse units without a street-facing facade shall have direct access to a common amenity area meeting the requirements of Section 23.45.522 that either abuts the street or is visible and accessible from the street by a clear pedestrian pathway.~~

~~2. Pedestrian pathway. A clear pedestrian pathway from the street to the entrance of each townhouse unit shall be provided. The pedestrian pathway may be part of a driveway, provided that the pathway is differentiated from the driveway by pavement color,~~

~~texture, or similar technique. Signage identifying townhouse unit addresses and the directions to the unit entrance(s) from the street shall be provided.~~

~~3. Pedestrian entry. Each townhouse unit with a street-facing facade shall have a pedestrian entry on the street-facing facade that is designed to be a visually prominent feature through the use of covered stoops, porches, or other architectural entry features. For townhouse units on corner lots, a visually prominent pedestrian entry is required on only one of the street-facing facades.~~

~~4. Architectural expression. Architectural detail or composition shall be provided to visually identify each individual townhouse unit, as seen from the public street. Design elements such as trim or molding, modulation, massing, color and material variation, or other similar features may be used to achieve visual identification of individual units. Rooftop features, such as dormers or clerestories, or roofline variation may be used to visually identify individual townhouse units.~~

~~H. Building entry orientation standards for apartments~~

~~1. For each apartment structure, a principal shared pedestrian entrance is required that faces either a street or a common amenity area, such as a landscaped courtyard, that abuts and has direct access to the street. Additional pedestrian entrances to individual units are permitted.~~

~~2. If more than one apartment structure is located on a lot, each apartment structure separated from the street by another principal structure shall have a principal entrance that is accessible from a common amenity area with access to the street.~~

~~3. The shared entrance of each apartment structure shall have a pedestrian entry that is designed to be visually prominent, through the use of covered stoops, overhead weather protection, a recessed entry, or other architectural entry features.~~))

F. Pedestrian access. Each dwelling unit shall have pedestrian access at least 3 feet in width to the sidewalk or, if no sidewalk exists, the front lot line. This pedestrian access may be shared or private. This pedestrian access may cross any required setbacks or interior separation. The pedestrian access may be part of a driveway.

G. Entrances. Each structure with a street-facing facade shall have a pedestrian entry on that street-facing facade meeting the following:

1. For apartments, at least one pedestrian entry shall be required for the structure as a whole.

2. For single-family dwelling units, cottage housing, rowhouses, and townhouses, each individual dwelling unit with a street-facing facade within 40 feet of the street lot line shall have at least one pedestrian entry on the street-facing facade.

3. For structures or dwelling units on corner lots, a pedestrian entry is required on only one of the street-facing facades.

4. Required pedestrian entry on street-facing facades shall have weather protection, such as a covered porch, canopy, recessed entry or similar feature, measuring at least 3 feet by 3 feet in width and depth for attached and detached dwelling units and at least 6 feet in width and 4 feet in depth for stacked dwelling units.

5. For attached and detached dwelling units, the pedestrian entry may be located on a wall perpendicular to the street-facing facade provided that the pedestrian entry abuts a covered porch or recessed entry that is a portion of the street-facing facade.

Section 24. Section 23.53.006 of the Seattle Municipal Code, last amended by Ordinance 127099, is amended as follows:

23.53.006 Pedestrian access and circulation

* * *

F. Exceptions. The following exceptions to pedestrian access and circulation requirements and standards apply:

1. Projects exempt from requirements. Pedestrian access and circulation improvements are not required for the following types of projects:

a. Change of use;

b. Alterations to existing structures;

c. Additions to existing structures that are exempt from environmental review;

d. Construction of a detached structure accessory to ((~~a single-family~~)) an existing dwelling unit in any zone, if the property owner enters into a no-protest agreement, as authorized by chapter 35.43 RCW, to future pedestrian access and circulation improvements and that agreement is recorded with the King County ((~~Recorder~~)) Recorder's Office;

e. Construction of ((~~a single-family~~)) one dwelling unit on a lot in any zone, if the property owner enters into a no-protest agreement, as authorized by chapter 35.43 RCW, to future pedestrian access and circulation improvements and that agreement is recorded with the King County ((~~Recorder~~)) Recorder's Office, and if at least one of the following conditions is met:

1) The lot is on a block front where there are no existing pedestrian access and circulation improvements within 100 feet of the lot; or

2) Construction of pedestrian access and circulation improvements is not necessary because, for example, the existing right-of-way has suitable width and surface treatment for pedestrian use; or the existing right-of-way has a limited amount of existing and potential vehicular traffic; or the Director anticipates limited, if any, additional development near the lot because the development near the lot is at or near zoned capacity under current zoning designations;

f. Expansions of surface parking, outdoor storage, outdoor sales and outdoor display of rental equipment of less than 20 percent of the parking, storage, sales or display area, or number of parking spaces;

g. In the MML zone, the addition of:

1) Fewer than ten artist's studio dwellings;

2) Less than 750 square feet of gross floor area of major and minor vehicle repair uses and multipurpose retail sales; ((~~and~~)) or

3) Less than 4,000 square feet of gross floor area of ((~~non-residential~~)) nonresidential uses not listed in subsection 23.53.006.F.1.g.2; and

h. Construction of a new ((~~non-residential~~)) nonresidential structure of up to 4,000 square feet of gross floor area if the structure is at least 50 feet from any lot line abutting an existing street that does not have pedestrian access and circulation improvements.

2. Waiver or modification of pedestrian access and circulation requirements. The Director, in consultation with the Director of Transportation, may waive or modify pedestrian access and circulation requirements when one or more of the following conditions are met. The waiver or modification shall provide the minimum relief necessary to accommodate site conditions while maximizing pedestrian access and circulation.

a. Location in an environmentally critical area or buffer makes installation of a sidewalk, curb, and/or curb ramp structurally impracticable or technically infeasible;

b. The existence of a bridge, viaduct, or structure such as a substantial retaining wall in proximity to the project site makes installation of a sidewalk, curb, and/or curb ramp structurally impracticable or technically infeasible;

c. Sidewalk, curb, and/or curb ramp construction would result in undesirable disruption of existing drainage patterns, or disturbance to or removal of natural features such as significant trees or other valuable and character-defining mature vegetation; or

d. Sidewalk, curb, and/or curb ramp construction would preclude vehicular access to the lot, for example on project sites where topography would render driveway access in excess of the maximum 15 percent slope.

3. Notwithstanding any provision of Section 23.76.026, the applicant for a Master Use Permit or a building permit to which ((~~the Land Use Code~~)) Title 23 in effect prior to October 30, 2009, applies may, by written election, use the exemptions in subsections 23.53.006.F.1 and 23.53.006.F.2.

Section 25. Section 23.53.025 of the Seattle Municipal Code, last amended by Ordinance 126682, is amended as follows:

23.53.025 Access easement standards

If access by easement has been approved by the Director, the easement shall meet the following standards. Surfacing of easements, pedestrian walkways required within easements, and turnaround dimensions shall meet the requirements of the Right-of-Way Improvements Manual.

A. Vehicle access easements serving one or two ((~~single-family~~)) dwelling units ((~~or one multifamily residential use with a maximum of two units~~)) shall meet the following standards:

1. Easement width shall be a minimum of 10 feet.

2. No maximum easement length shall be set. If easement length is more than 150 feet, a vehicle turnaround shall be provided.

3. ((~~Curbcut~~)) Curb cut width from the easement to the street shall be the minimum necessary for safety and access.

B. Vehicle access easements serving at least three but fewer than ((~~five single-family~~)) ten dwelling units shall meet the following standards:

1. Easement width shall be a minimum of 10 feet.

2. The easement shall provide a hard-surfaced roadway at least 10 feet wide.

3. No maximum easement length shall be set. If the easement is over 600 feet long, a fire hydrant may be required by the Director.

4. A turnaround shall be provided unless the easement extends from street to street.

5. ((~~Curbcut~~)) Curb cut width from the easement to the street shall be the minimum necessary for safety and access.

C. ((~~Vehicle access easements serving at least five but fewer than ten single-family dwelling units, or at least three but fewer than ten multifamily dwelling units~~

~~1. Easement width, surfaced width, length, turn around, and curbcut width shall be as required in subsection 23.53.025.B.~~

~~2. No single-family structure shall be closer than 5 feet to the easement, except that structural features allowed to extend into required yards under subsection 23.44.014.C.6 are also allowed to extend into the 5-foot setback from an easement.~~

~~D.~~)) Vehicle ((~~Access Easements Serving Ten~~)) access easements serving ten or more ((~~Residential Units.~~)) dwelling units shall meet the following standards:

1. Easement width shall be a minimum of 32 feet;

2. The easement shall provide a surfaced roadway at least 24 feet wide, except in the MPC-YT zone, where the minimum surfaced roadway width is 20 feet;

3. No maximum length shall be set. If the easement is over 600 feet long, a fire hydrant may be required by the Director;

4. A turnaround shall be provided unless the easement extends from street to street;

5. ((~~Curbcut~~)) Curb cut width from the easement to the street shall be the minimum necessary for safety access;

6. No ((~~single-family structure~~)) detached dwelling unit shall be located closer than ((~~10~~)) 5 feet to an easement, except that architectural features such as cornices, eaves, gutters, roofs, fireplaces, chimneys, and other similar features shall not be located closer than 3 feet to a required easement;

7. One pedestrian walkway shall be provided, extending the length of the easement.

((~~E. Vehicle Access Easements Serving Nonresidential or Live-work Uses.~~

~~1.~~)) D. For nonresidential or live-work uses providing fewer than ten (((~~10~~))) parking spaces, the easement shall meet the requirements of subsection ((~~C~~)) 23.53.025.B.

((~~2~~)) E. For nonresidential or live-work uses providing ten ((~~(10)~~)) or more parking spaces, the easement shall meet the requirements of subsection ((~~D~~)) 23.53.025.C.

F. Pedestrian ((~~Access Easements~~)) access easements. Where a lot proposed for a residential use abuts an alley but does not abut a street and the provisions of the zone require access by vehicles from the alley, or where the alley access is an exercised option, an easement providing pedestrian access to a street from the lot shall be provided meeting the following standards:

1. Easement width shall be a minimum of ((~~five (~~)) 5 ((~~)~~)) feet;

2. Easements serving one ((~~(1)~~)) or two ((~~(2)~~)) dwelling units shall provide a paved pedestrian walkway at least ((~~three (~~)) 3 ((~~)~~)) feet wide;

3. Easements serving three ((~~(3)~~)) or more dwelling units shall provide a paved pedestrian walkway at least ((~~five (~~)) 5 ((~~)~~)) feet wide;

4. Easements over ((~~one hundred (~~)) 100 ((~~)~~)) feet in length shall provide lighting at intervals not to exceed ((~~fifty (~~)) 50 ((~~)~~)) feet. Lighting placement shall not exceed ((~~fifteen (~~)) 15 ((~~)~~)) feet in height;

5. Pedestrian access easements shall not exceed ((~~two hundred (~~)) 200 ((~~)~~)) feet in length.

G. Vertical ((~~Clearance Above Easements~~)) clearance above easements. When an easement serves fewer than ten ((~~(10)~~)) residential units and crosses a residentially zoned lot, portions of structures may be built over the easement provided that a minimum vertical clearance of ((~~sixteen and one-half (16 ½)~~)) 16.5 feet is maintained above the surface of the easement roadway and a minimum turning path radius in accordance with ((~~Section 23.54.030 C~~)) subsection 23.54.030.D is maintained. (((~~See~~)) Exhibit ((~~23.53.025 A~~)) A for 23.53.025.)

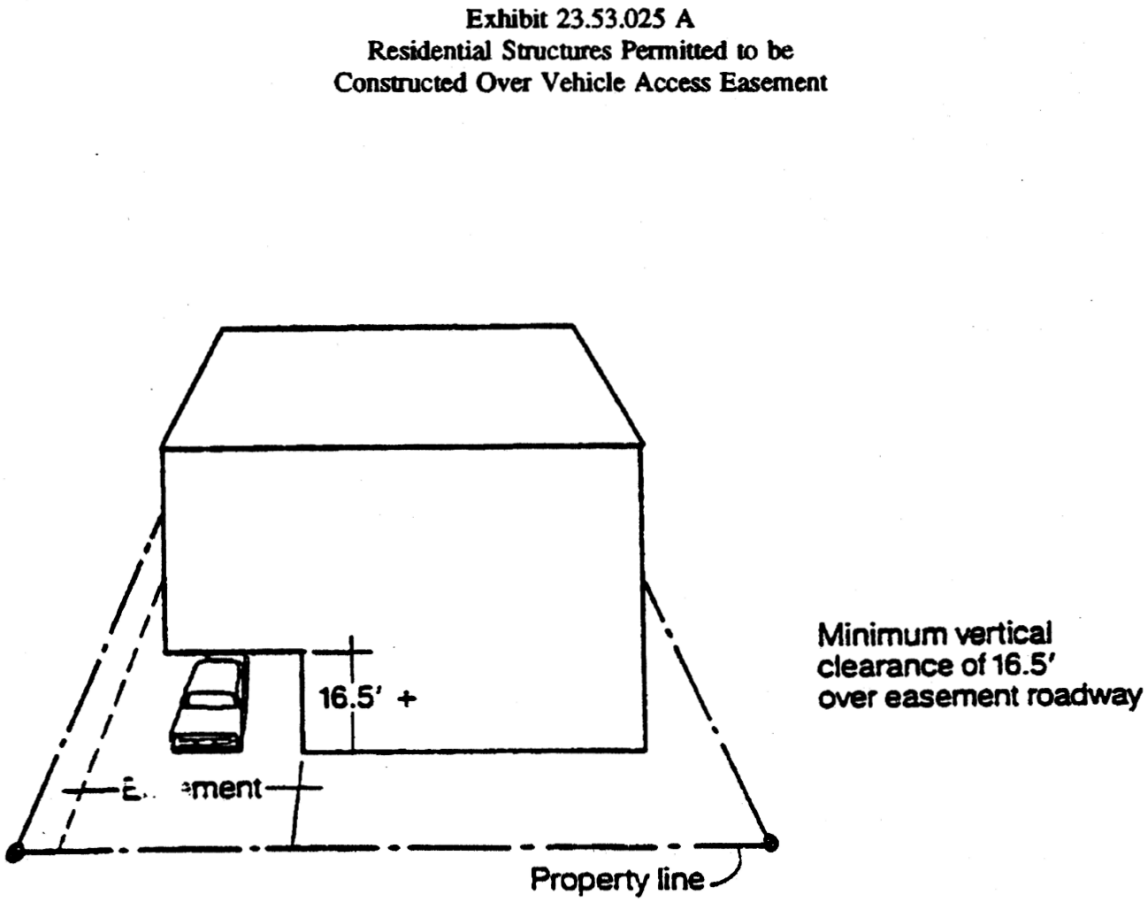
H. Exceptions ((~~From Access Easement Standards~~)) from access easement standards. The Director, in consultation with the Fire Chief, may modify the requirements for easement width and surfacing for properties located in environmentally critical areas or their buffers when it is determined that:

1. Such modification(s) would reduce adverse effects to identified environmentally critical areas or buffers; and

2. Adequate access and provisions for fire protection can be provided for structures served by the easement.

Exhibit A for 23.53.025

Residential structures permitted to be constructed over vehicle access easement



Section 26. Section 23.54.015 of the Seattle Municipal Code, last amended by Ordinance 127099, is amended as follows:

23.54.015 Required parking and maximum parking limits

* * *

Table B for 23.54.015 **Required parking for residential uses**		
Use		**Minimum parking required**
I. General residential uses [2]		
A.	Adult family homes	1 space for each dwelling unit
B.	Artist's studio/dwellings	1 space for each dwelling units
C.	Assisted living facilities	1 space for each 4 assisted living units; plus 1 space for each 2 staff members on-site at peak staffing time; plus 1 barrier-free passenger loading and unloading space
D.	Caretaker's quarters	1 space for each dwelling unit
E.	Congregate residences [1]	1 space for each 4 sleeping rooms
F.	Cottage housing developments [1, 3, 4]	1 space for each dwelling unit
G.	Floating homes	1 space for each dwelling unit
H.	Mobile home parks	1 space for each mobile home lot as defined in Chapter 22.904
I.	Multifamily residential uses((~~, except as otherwise provided in this Table B for 23.54.015~~)) [1, ((2)) 3, 4]	1 space per dwelling unit, or 1 space for each 2 small efficiency dwelling units
J.	Nursing homes	1 space for each 2 staff doctors; plus 1 additional space for each 3 employees; plus 1 space for each 6 beds
K.	Single-family dwelling units [1, 3, 4]	1 space for each dwelling unit

Table B for 23.54.015 **Required parking for residential uses**		
Use		**Minimum parking required**
II. Residential use requirements for specific areas [2]		
L.	All residential uses within urban centers or within the Station Area Overlay District ((2))	No minimum requirement
M.	All residential uses in commercial, RSL, and multifamily zones within urban villages that are not within urban center or the Station Area Overlay District, if the residential use is located within a frequent transit service area ((2, 4))	No minimum requirement
N.	Multifamily residential uses within the University of Washington parking impact area shown on Map A for 23.54.015 ((2))	1 space per dwelling unit for dwelling units with fewer than 2 bedrooms; plus 1.5 spaces per dwelling units with 2 or more bedrooms; plus 0.25 spaces per bedroom for dwelling units with 3 or more bedrooms
O.	Multifamily dwelling units, within the Alki area shown on Map B for 23.54.015 ((2))	1.5 spaces for each dwelling unit
P.	Congregate residences located within one-half mile walking distance of a major transit stop or a frequent transit stop	No minimum requirement
Q.	Middle housing, as defined in Section 23.84A.025, located within one-half mile walking distance of a major transit stop	No minimum requirement
Footnotes to Table B for 23.54.015 [1] For each moderate-income unit and each low-income unit, no minimum amount of parking is required. [2] The minimum amount of parking prescribed by Part I of Table B for 23.54.015 does not		

Table B for 23.54.015
Required parking for residential uses

Use	Minimum parking required
apply if a use, structure, or development qualifies for a greater or a lesser amount of minimum parking, including no parking, under any other provision of this Section 23.54.015. If more than one provision in this Table B for 23.54.015 is applicable, the provision requiring the least amount of minimum parking applies((~~, except that if item O in Part II of Table B for 23.54.015 applies, it shall supersede any other requirement in Part I or Part II of this Table B for 23.54.015~~)). [3] No parking is required for ((~~single-family residential uses~~)) accessory dwelling units. [4] No parking is required for principal dwelling units on lots in any residential zone that are less than 3,000 square feet in size or less than 30 feet in width where access to parking is permitted through a required yard or setback abutting a street according to the standards of subsections 23.44.016.B.2, 23.45.536.C.2, or 23.45.536.C.3. ((~~4 Except as provided in Footnote 4, the minimum amounts of parking prescribed by Part 1 of Table B for 23.54.015 apply within 1,320 feet of the Fauntleroy Ferry Terminal.~~))	

* * *

Table D for 23.54.015
Parking for bicycles [1]

((~~USE~~)) Use		Bike parking requirements	
		Long-term	Short-term
* * *			
D. RESIDENTIAL USES [3]			
D.1	Congregate residences [4, 5, 6]	1 per 4 sleeping rooms	1 per 80 sleeping rooms. 2 spaces minimum
D.2	Multifamily structures other than townhouse and rowhouse developments [4, 5, 6]	1 per dwelling unit	1 per 20 dwelling units
D.3	Single-family residences	None	None

Table D for 23.54.015
Parking for bicycles [1]

((~~USE~~)) Use		Bike parking requirements	
		Long-term	**Short-term**
D.4	Townhouse and rowhouse developments [5, 6]	1 per dwelling unit	None
E. TRANSPORTATION FACILITIES			
E.1((-))	Park and ride facilities on surface parking lots	At least 20 ((~~6~~)) [7]	At least 10
E.2((-))	Park and ride facilities in parking garages	At least 20 if parking is the principal use of a property; zero if non-parking uses are the principal use of a property	At least 10 if parking is the principal use of a property; zero if non-parking uses are the principal use of a property
E.3((-))	Flexible-use parking garages and flexible-use parking surface lots	1 per 20 auto spaces	None
E.4((-))	Rail transit facilities and passenger terminals	Spaces for 5 percent of projected AM peak period daily ridership ((~~6~~)) [7]	Spaces for 2 percent of projected AM peak period daily ridership

Footnotes to Table D for 23.54.015
[1] Required bicycle parking includes long-term and short-term amounts shown in this Table D for 23.54.015.
[2] The Director may reduce short-term bicycle parking requirements for theaters and spectator sport facilities that provide bicycle valet services authorized through a Transportation Management Program. A bicycle valet service is a service that allows bicycles to be temporarily stored in a secure area, such as a monitored bicycle corral.
[3] For residential uses, after the first 50 spaces for bicycles are provided, additional spaces are required at three-quarters the ratio shown in this Table D for 23.54.015.
[4] For congregate residences or multifamily structures that are owned and operated by a not-for-profit entity serving seniors or persons with disabilities, or that are licensed by the State and provide supportive services for seniors or persons with disabilities, as a Type I

Table D for 23.54.015 Parking for bicycles [1]		
((~~USE~~)) Use	**Bike parking requirements**	
	Long-term	**Short-term**
decision, the Director shall have the discretion to reduce the amount of required bicycle parking to as few as zero if it can be demonstrated that residents are less likely to travel by bicycle. [5] In low-income housing, there is no minimum required long-term bicycle parking requirement for each unit subject to affordability limits no higher than 30 percent of median income and long-term bicycle parking requirements may be waived by the Director as a Type I decision for each unit subject to affordability limits greater than 30 percent of median income and no higher than 80 percent of median income if a reasonable alternative is provided (e.g., in-unit vertical bike storage). [6] No bike parking is required for middle housing as defined in Section 23.84A.025. ((~~6~~)) [7] The Director, in consultation with the Director of Transportation, may require more bicycle parking spaces based on the following factors: area topography; pattern and volume of expected bicycle users; nearby residential and employment density; proximity to the Urban Trails system and other existing and planned bicycle facilities; projected transit ridership and expected access to transit by bicycle; and other relevant transportation and land use information.		

Section 27. Section 23.54.020 of the Seattle Municipal Code, last amended by Ordinance 126509, is amended as follows:

23.54.020 Parking quantity exceptions

The motor vehicle parking quantity exceptions set forth in this Section 23.54.020 apply in all zones except downtown zones, which are regulated by Section 23.49.019, and Major Institution zones, which are regulated by Section 23.54.016.

A. Adding ((~~Units~~)) units to ((~~Existing Structures~~)) existing structures in Multifamily and Commercial ((~~Zones.~~)) zones

1. For the purposes of this Section 23.54.020, "existing structures" means those structures that were established under permit, or for which a permit has been granted and has not expired as of the applicable date, as follows:

a. In multifamily zones, August 10, 1982;

b. In commercial zones, June 9, 1986.

2. In locations in a multifamily or commercial zone where there is a minimum parking requirement, one dwelling unit may either be added to an existing structure or may be built on a lot that contains an existing structure without additional parking if both of the following requirements are met:

a. Either the existing parking provided on the lot meets development standards, or the lot area is not increased and existing parking is screened and landscaped to the greatest extent practical; and

b. Any additional parking shall meet all development standards for the zone.

3. In locations in a multifamily or commercial zone where there is a minimum parking requirement, the Director may authorize a reduction or waiver of the parking requirement as a Type I decision when dwelling units are proposed to be added either to an existing structure or on a lot that contains an existing structure, in addition to the exception permitted in subsection 23.54.020.A.2, if the conditions in subsections 23.54.020.A.3.a and b below are met, and either of the conditions in subsections 23.54.020.A.3.c or d below are met:

a. The only use of the structure will be residential; and

b. The lot is not located in either the University District Parking Overlay Area (Map A for 23.54.015) or the Alki Area Parking Overlay (Map B for 23.54.015); and

c. The topography of the lot or location of existing structures makes provision of an off-street parking space physically infeasible in a conforming location; or

~~d.~~ The lot is located in a residential parking zone (RPZ) and a current parking study is submitted showing a utilization rate of less than 75 percent for on-street parking within 400 feet of all lot lines.

B. Tandem ((~~Parking~~)) parking in ((~~Multifamily Structures~~)) multifamily structures. ((~~1.~~)) Off-street parking required for multifamily structures may be provided as tandem parking, as defined in Section 23.54.030. ((~~A tandem parking space counts as one-and-one-half parking spaces, except as provided in subsection 23.54.020.B.2 below, and must meet the minimum size requirements of subsection 23.54.030.A.~~

~~2. When a minimum of at least one parking space per dwelling unit in a multifamily structure is required, the total number of parking spaces provided, counting each tandem parking space as one space, may not be less than the total number of dwelling units.~~)) A tandem parking space counts at a rate of one space for every 20 linear feet of depth excluding required aisles.

* * *

Section 28. Section 23.54.030 of the Seattle Municipal Code, last amended by Ordinance 127099, is amended as follows:

23.54.030 Parking space and access standards

All parking spaces provided, whether required by Section 23.54.015 or not, and required barrier-free parking, shall meet the standards of this Section 23.54.030.

A. Parking space dimensions

1. "Large vehicle" means the minimum size of a large vehicle parking space shall be ((~~8.5~~)) 8 feet in width and 19 feet in length.

2. “Medium vehicle” means the minimum size of a medium vehicle parking space shall be 8 feet in width and 16 feet in length.

3. “Small vehicle” means the minimum size of a small vehicle parking space shall be 7.5 feet in width and 15 feet in length.

4. “Barrier-free parking” means a parking space meeting the following standards:

a. Parking spaces shall not be less than 8 feet in width and shall have an adjacent access aisle not less than 5 feet in width. Van-accessible parking spaces shall have an adjacent access aisle not less than 8 feet in width. Where two adjacent spaces are provided, the access aisle may be shared between the two spaces. Boundaries of access aisles shall be marked so that aisles will not be used as parking space.

b. A minimum length of 19 feet or when more than one barrier-free parking space is provided, at least one shall have a minimum length of 19 feet, and other spaces may be the lengths of small, medium, or large spaces in approximate proportion to the number of each size space provided on the lot.

5. “Tandem parking” means a parking space equal to the width and two times the length of the vehicle size standards in subsections 23.54.030.A.1, 23.54.030.A.2, and 23.54.030.A.3 for the size of the vehicle to be accommodated.

6. No wall, post, guardrail, or other obstruction, or lot line, is permitted within the area for car door opening. Columns or other structural elements may encroach into the parking space a maximum of 6 inches on a side, except in the area for car door opening 5 feet from the longitudinal centerline, or 4 feet from the transverse centerline of a parking space (see Exhibit A for 23.54.030).

7. If the parking space is next to a lot line and the parking space is parallel to the lot line, the minimum width of the space is 9 feet.

Exhibit A for 23.54.030

Encroachments ((~~Into Required Parking Space~~)) <u>into required parking</u>

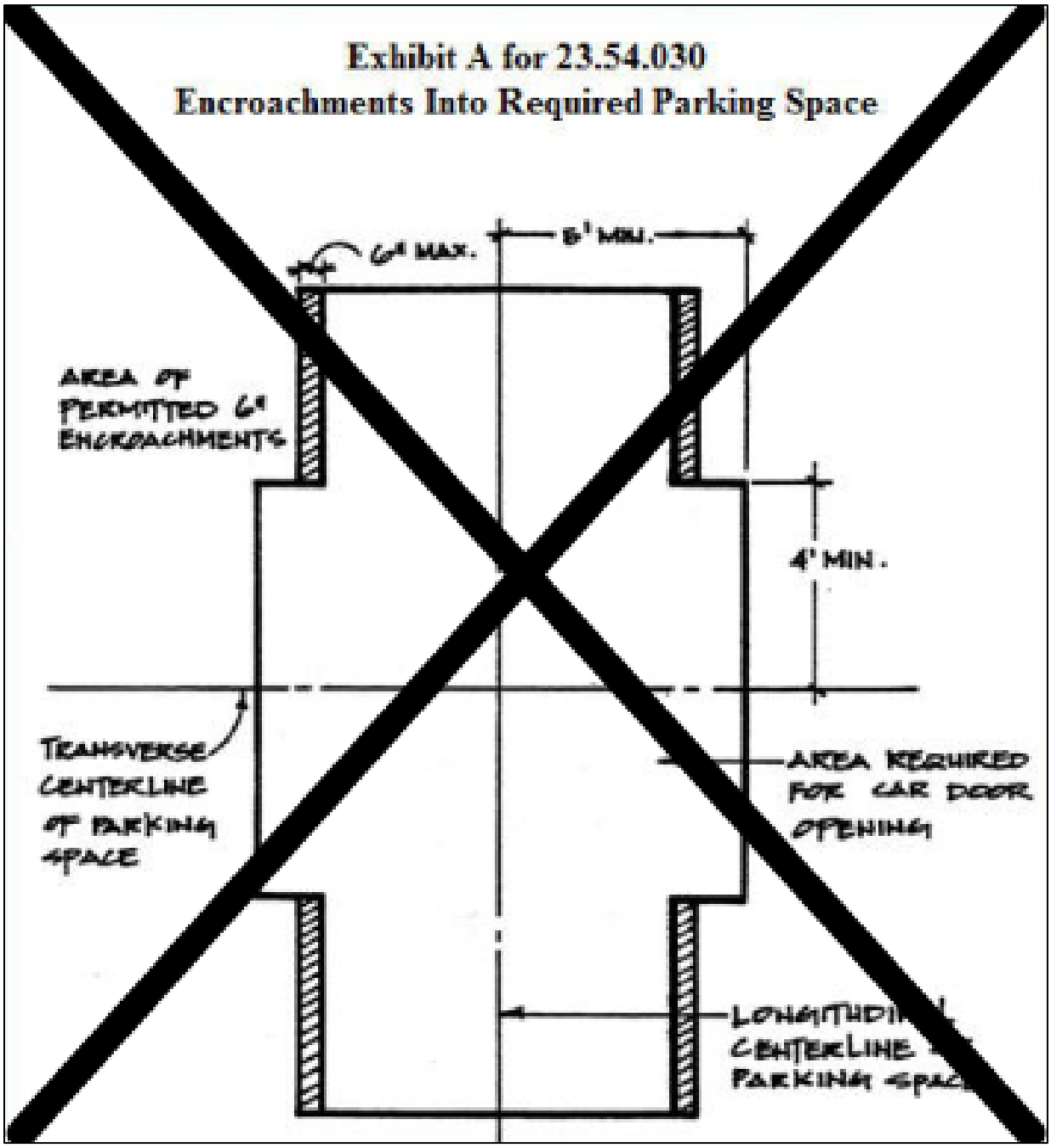
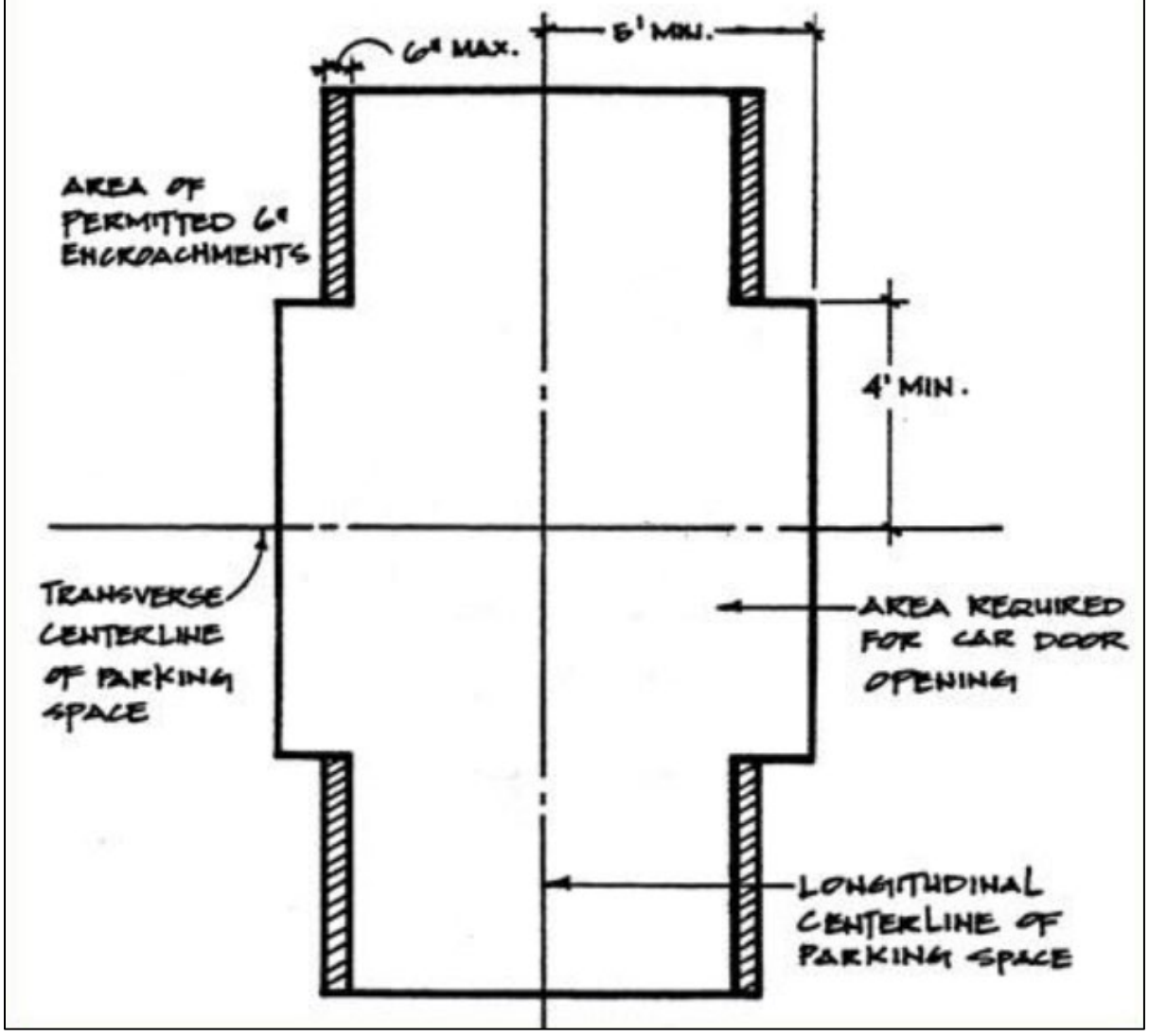


Exhibit A for 23.54.030
Encroachments into required parking



B. Parking space requirements. The required size of parking spaces shall be determined by whether the parking is for a residential, live-work, or ((~~non-residential~~)) nonresidential use. In structures containing residential uses and also containing either ((~~non-residential~~)) nonresidential uses or live-work units, parking that is clearly set aside and reserved for residential or live-work use shall meet the standards of subsection 23.54.030.B.1. Parking for

all other uses within the structure shall meet the standards of subsection 23.54.030.B.2. All uses shall provide barrier-free accessible parking if required by the Seattle Building Code or the Seattle Residential Code.

1. Residential uses

a. When five or fewer parking spaces are provided, the minimum required size of a parking space shall be for a medium vehicle, as described in subsection 23.54.030.A.2, except as provided in subsection 23.54.030.B.1.d.

b. When more than five parking spaces are provided, a minimum of 60 percent of the parking spaces shall be striped for medium vehicles. The minimum size for a medium parking space shall also be the maximum size. Forty percent of the parking spaces may be striped for any size category in subsection 23.54.030.A, provided that when parking spaces are striped for large vehicles, the minimum required aisle width shall be as shown for medium vehicles.

c. Assisted living facilities. Parking spaces shall be provided as in subsections 23.54.030.B.1.a and 23.54.030.B.1.b, except that a minimum of two spaces shall be striped for a large vehicle.

d. ((~~Townhouse units.~~)) For an individual garage serving ((~~a townhouse~~)) an individual dwelling unit, the minimum required size of a parking space shall be for a medium vehicle, as described in subsection 23.54.030.A.

2. ((~~Non-residential~~)) Nonresidential uses

a. When ten or fewer parking spaces are provided, a maximum of 25 percent of the parking spaces may be striped for small vehicles. A minimum of 75 percent of the spaces shall be striped for large vehicles.

b. When between 11 and 19 parking spaces are provided, a minimum of 25 percent of the parking spaces shall be striped for small vehicles. The minimum required size for these small parking spaces shall also be the maximum size. A maximum of 65 percent of the parking spaces may be striped for small vehicles. A minimum of 35 percent of the spaces shall be striped for large vehicles.

c. When 20 or more parking spaces are provided, a minimum of 35 percent of the parking spaces shall be striped for small vehicles. The minimum required size for small parking spaces shall also be the maximum size. A maximum of 65 percent of the parking spaces may be striped for small vehicles. A minimum of 35 percent of the spaces shall be striped for large vehicles.

d. The minimum vehicle clearance shall be at least 6 feet 9 inches on at least one floor, and there shall be at least one direct entrance that is at least 6 feet 9 inches in height for all parking garages accessory to ((~~non-residential~~)) nonresidential uses and live-work units and for all flexible-use parking garages.

3. Live-work uses. The first required parking space shall meet the parking standards for residential use. Additional required parking for a live-work use shall meet the parking standards for ((~~non-residential~~)) nonresidential use.

C. Backing ((~~Distances~~)) distances and ((~~Moving Other Vehicles.~~)) moving other vehicles

1. Adequate ingress to and egress from all parking spaces shall be provided without having to move another vehicle, except in the case of multiple spaces provided for ((~~a single-family~~)) one dwelling unit ((~~or an accessory dwelling unit associated with a single-~~

~~family dwelling,~~)) or in the case of tandem parking authorized under ((~~Section~~)) subsection 23.54.020.B.

2. Except for lots with fewer than three parking spaces, ingress to and egress from all parking spaces shall be provided without requiring backing more than 50 feet.

D. Driveways. Driveway requirements for residential and nonresidential uses are described below. When a driveway is used for both residential and nonresidential parking, it shall meet the standards for nonresidential uses described in subsection 23.54.030.D.2.

1. Residential uses((~~.~~))

a. Driveway width. Driveways less than 100 feet in length that serve 30 or fewer parking spaces shall be a minimum of 10 feet in width for one-way or two-way traffic.

b. Except for driveways serving one ((~~single-family~~)) dwelling unit, driveways more than 100 feet in length that serve 30 or fewer parking spaces shall either:

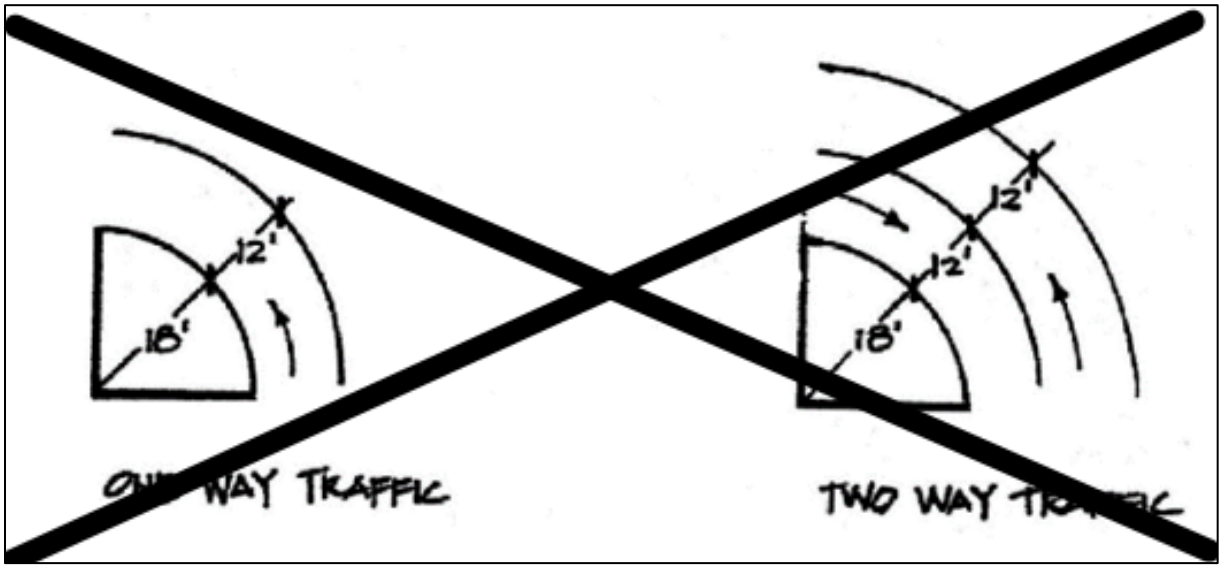
1) ((~~be~~)) Be a minimum of 16 feet wide, tapered over a 20 foot distance to a 10 foot opening at the lot line; or

2) ((~~be~~)) Be a minimum of 10 feet wide and provide a passing area at least 20 feet wide and 20 feet long. The passing area shall begin 20 feet from the lot line, with an appropriate taper to meet the 10-foot opening at the lot line. If a taper is provided at the other end of the passing area, it shall have a minimum length of 20 feet.

c. Driveways of any length that serve more than 30 parking spaces shall be at least 10 feet wide for one-way traffic and at least 20 feet wide for two-way traffic.

d. Driveways for two attached ((~~rowhouse or townhouse~~)) dwelling units may be paired so that there is a single curb cut providing access. The maximum width of the paired driveway is 18 feet.

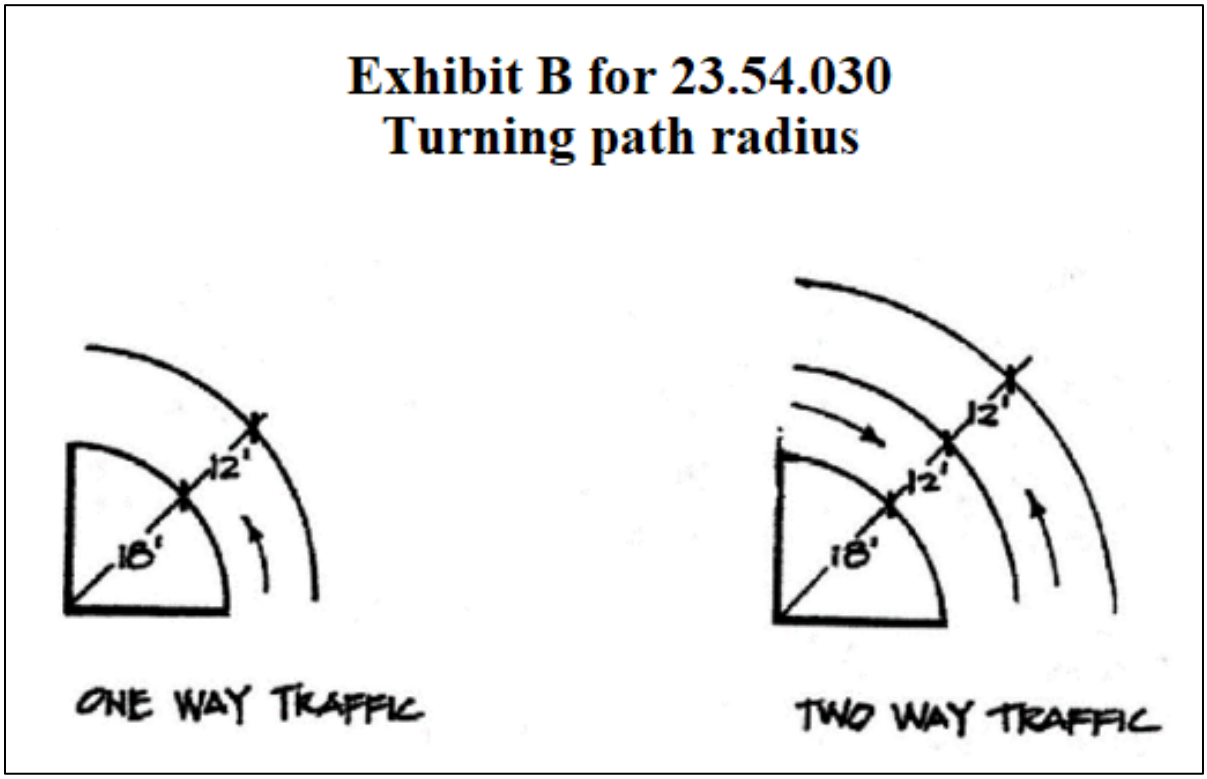
e. Driveways with a turning radius of more than 35 degrees shall conform to the minimum turning path radius shown in Exhibit B for 23.54.030.



((~~Exhibit B for 23.54.030: Turning Path Radius~~))

Exhibit B for 23.54.030

Turning path radius



f. Vehicles may back onto a street from a parking area serving five or fewer vehicles, provided that either:

1) The street is not an arterial as defined in Section 11.18.010; or

2) For a lot with one ((~~single-family~~)) dwelling unit or one parking space, the Director may permit backing onto an arterial based on a safety analysis that addresses visibility, traffic volume, and other relevant issues.

g. Nonconforming driveways. The number of parking spaces served by an existing driveway that does not meet the standards of this subsection 23.54.030.D.1 shall not be increased. This prohibition may be waived by the Director after consulting with the Director of the Seattle Department of Transportation, based on a safety analysis.

2. Nonresidential ((~~Uses.~~)) uses

a. Driveway ((~~Widths.~~)) widths

1) The minimum width of driveways for ((~~one way~~)) one-way traffic shall be 12 feet and the maximum width shall be 15 feet.

2) The minimum width of driveways for ((~~two way~~)) two-way traffic shall be 22 feet and the maximum width shall be 25 feet.

b. Driveways shall conform to the minimum turning path radius shown in Exhibit B for 23.54.030.

c. For driveways that provide access to a solid waste management use the Director may allow both a maximum driveway width greater than the limits set in subsection 23.54.030.D.2.a and appropriate turning path radii, as determined necessary for truck maneuvering.

3. Driveway slope for all uses. No portion of a driveway, whether located on a lot or on a right-of-way, shall exceed a slope of 15 percent, except as provided in this subsection 23.54.030.D.3. The maximum 15 percent slope shall apply in relation to both the current grade of the right-of-way to which the driveway connects, and to the proposed finished grade of the right-of-way if it is different from the current grade. The ends of a driveway shall be adjusted to accommodate an appropriate crest and sag. The Director may permit a driveway slope of more than 15 percent if it is found that:

a. The topography or other special characteristic of the lot makes a 15 percent maximum driveway slope infeasible;

b. The additional amount of slope permitted is the least amount necessary to accommodate the conditions of the lot; and

c. The driveway is still useable as access to the lot.

E. Parking aisles

1. Parking aisles shall be provided according to the requirements of Table A for 23.54.030 and Exhibit C for 23.54.030.

Table A for 23.54.030
Parking aisle dimensions

Parking angle	Stall width	Stall length (in feet)	Aisle width (in feet)[1]	Curb depth per car (in feet)	Unit width (in feet)[2]	Curb length per car (in feet)
0°	Small	18	10	7.5	25	18
	Medium	20	10	8	26	20
	Large	24	12	8	28	24
45°	Small	15	11	15.91	42.82	10.61
	Medium	16	13	16.97	46.94	11.3
	Large	19	13	19.09	51.18	11.3
60°	Small	15	13	16.74	46.48	8.66
	Medium	16	15	17.86	50.72	9.24
	Large	19	17.5	20.45	58.41	9.24
75°	Small	15	16.5	16.43	49.36	7.76
	Medium	16	18.5	17.52	53.55	8.25
	Large	19	20	20.42	60.84[2]	8.25
90°	Small	15	20	15	50	7.5
	Medium	16	22	16	54	8
	Large	19	24[3]	19	62[2]	8

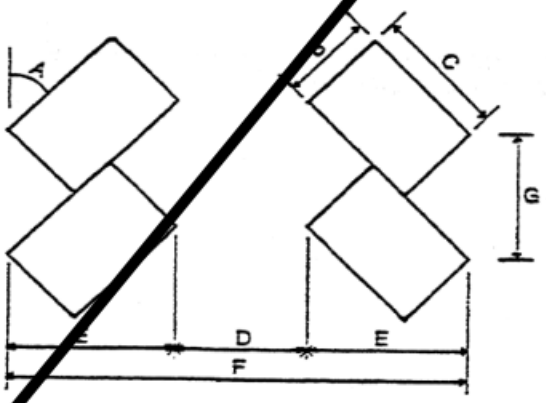
Footnotes for Table A for 23.54.030
[1] Required aisle width is for one-way traffic only. If two-way traffic is proposed, then the minimum aisle width shall be 20 feet or greater.
[2] 60 feet may be substituted for required unit width on lots where the available width is in 60-foot whole multiples, provided that the minimum width of the parking stalls shall be 9 feet.
[3] For lots 44 feet in width or less, the Director may reduce the aisle width to as low as 20 feet if large parking spaces are provided at 90 degrees as long as the spaces are 9 feet wide.

A Parking Angle	B Stall Width	C Stall Length	D Aisle Width [1]	E Curb Depth Per Car	F Unit Width [3]	G Curb Length Per Car
0°	7.5	18.0	10.0	7.5	25.0	18.0
	8.0	20.0	10.0	8.0	26.0	20.0
	8.5	24.0	12.0	8.5	29.0	24.0
45°	7.5	15.0	11.0	15.91	42.82	10.61
	8.0	16.0	13.0	16.97	46.90	11.3
	8.5	19.0	13.0	19.44	51.88	12.02
60°	7.5	15.0	13.0	16.74	46.48	8.66
	8.0	16.0	15.0	17.86	50.72	9.24
	8.5	19.0	17.5	20.70	59.90	9.82
75°	7.5	15.0	16.5	16.43	59.36	7.76
	8.0	16.0	18.5	17.52	53.54	8.25
	8.5	19.0	20.0	20.55	61.10 [3]	8.80
90°	7.5	15.0	20.0	15.0	50.0	7.5
	8.0	16.0	22.0	16.0	54.0	8.0
	8.5	19.0 [2]	24.0 [2]	19.0	62.0 [3]	8.5

[1] Required aisle width is for one-way traffic only. If two-way traffic is proposed, then the minimum aisle width shall be 20 feet or greater.

[2] When lot width is less than 43 feet, 40 feet may be substituted for a two-way aisle and a single row of cars at 90° to the aisle, provided that the minimum width of the parking stalls shall be 9½ feet.

[3] 60 feet may be substituted for required unit width on lots where the available width is in 60-foot whole multiples, provided that the minimum width of the parking stalls shall be 9½ feet.



The following equations may be used to compute dimensions for parking angles other than those provided in the chart above:

E = C sin A + B cos A

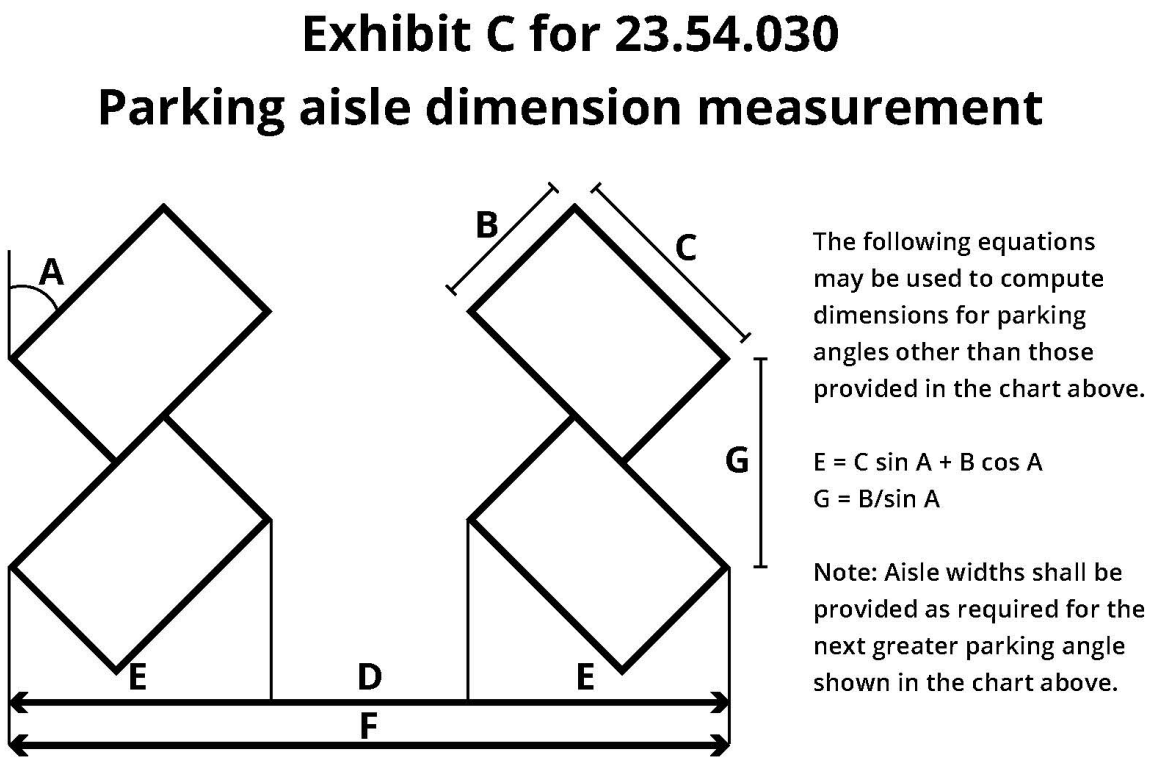
G = B/sin A

NOTE: Aisle widths shall be provided as required for the next greater parking angle shown in the chart above.

((~~Exhibit C for 23.54.030: Parking Aisle Dimensions~~))

Exhibit C for 23.54.030

Parking aisle dimension measurement



2. Minimum aisle widths shall be provided for the largest vehicles served by the aisle.

3. Turning and maneuvering areas shall be located on private property, except that alleys may be credited as aisle space.

4. Aisle slope shall not exceed 17 percent provided that the Director may permit a greater slope if the criteria in subsections 23.54.030.D.3.a, 23.54.030.D.3.b, and 23.54.030.D.3.c are met.

* * *

L. Electric vehicle (EV) charging infrastructure. New parking spaces provided on a lot when a new building is constructed shall be "EV-ready" as specified in this subsection 23.54.030.L. The required number of EV-ready parking spaces shall be determined by whether the parking is for a residential or nonresidential use. Parking that is clearly set aside and reserved for residential use shall meet the standards of subsection 23.54.030.L.1; parking for all other uses within the structure shall meet the standards of subsection 23.54.030.L.2.

1. Residential uses

a. Private parking for individual residential units. When parking for any individual dwelling unit is provided in a private garage, carport, or parking area, separate from any parking facilities serving other units, at least one parking space for each unit in that garage, carport, or surface parking area shall be EV-ready.

b. Surface parking for multiple ((~~residences~~)) dwelling units. When parking for ((~~multifamily residential uses~~)) multiple dwelling units is provided in a surface parking area serving multiple ((~~residences~~)) dwelling units, the number of parking spaces that shall be EV-ready shall be as follows:

((~~1) When between one and six parking spaces are provided, each of those parking spaces shall be EV-ready;~~

~~2) When between seven and 25 parking spaces are provided, a minimum of six of those parking spaces shall be EV-ready; and~~

~~3) When more than 25 parking spaces are provided, a minimum of 20 percent of those parking spaces shall be EV-ready.~~))

1) When up to 25 parking spaces are provided, the first 12 parking spaces shall be EV-ready; and

2) When more than 25 parking spaces are provided, 45 percent of all parking spaces shall be EV-ready.

c. Parking garages for multiple ((~~residences~~)) dwelling units. When parking for ((~~multifamily residential uses~~)) multiple dwelling units is provided in a parking garage serving multiple ((~~residences~~)) dwelling units, a minimum of ((~~20~~)) 45 percent of those parking spaces shall be EV-ready.

((~~d. Other residential uses. When parking is provided for all other residential uses, a minimum of 20 percent of those spaces shall be EV-ready.~~))

2. Nonresidential uses.

a. When parking is provided for nonresidential uses, a minimum of ((~~ten~~)) 30 percent of those spaces shall be EV-ready((~~.~~)), except as provided in subsection 23.54.030.L.2.b and subsection 23.54.030.L.2.c.

b. For the uses listed in subsection 23.54.030.L.2.c, the following requirements apply:

1) Where less than ten parking spaces are provided for the use, one EV-ready space is required.

2) Where ten or more parking spaces are provided for the use, ten percent of parking spaces shall be EV-ready.

c. The following uses are subject to the alternative requirements in 23.54.030.L.2.b:

1) The following institutional uses:

a) Community club or center;

b) Child care center;

c) Community farm;

d) Library;

e) Museum;

f) Private club;

g) Religious facility; and

h) School, elementary or secondary;

2) Entertainment uses;

3) Eating and drinking establishments;

4) Automotive sales and services;

5) Multipurpose retail sales;

6) Heavy sales and services, except heavy commercial services; and

7) Marine sales and services.

3. Rounding. When calculating the number of required EV-ready parking spaces, any fraction or portion of an EV-ready parking space required shall be rounded up to the nearest whole number.

4. Reductions

a. The Director may, in consultation with the Director of Seattle City Light, reduce the requirements of this subsection 23.54.030.L as a Type I decision ((~~where~~)) if there is substantial evidence ((~~substantiating~~)) that the added electrical load that can be attributed to meeting the requirements will:

1) Alter the local utility infrastructure design requirements on the utility side of the legal point of service, so as to require on-property power transformation; or

2) Require an upgrade to an existing residential electrical service.

b. In cases where the provisions of subsection 23.54.030.L.4.a have been met, the maximum quantity of EV charging infrastructure required to be installed shall be reduced to the maximum service size that would not require the changes to transformation or electrical service in subsection 23.54.030.L.4.a. The Director may first reduce the required level of EV infrastructure at EV-ready parking spaces from 40-amp to 20-amp circuits. If necessary, the Director may also then reduce the number of required EV-ready parking spaces or otherwise reduce the level of EV infrastructure at EV-ready parking spaces.

c. The Director may establish by rule the procedures and documentation required for a reduction request.

5. All EV charging infrastructure shall be installed in accordance with the Seattle Electrical Code. Where EV-ready surface parking spaces are located more than 4 feet from a building, raceways shall be extended to a pull box or stub in the vicinity of the designated space and shall be protected from vehicles.

6. Accessible parking. Where new EV-ready parking spaces and new accessible parking are both provided, parking facilities shall be designed so that at least ((~~one~~)) 20 percent of the accessible parking spaces shall be EV-ready with no fewer than two EV-ready spaces. The accessible parking EV-ready infrastructure may also serve adjacent parking spaces not designated as accessible parking. The EV-ready accessible parking spaces, rounded up to the next whole number, are allowed to be included in the total number of electric vehicle parking spaces required under 23.54.030.L.1. and 23.54.030.L.2.

7. Nothing in this subsection 23.54.030.L shall be construed to modify the minimum number of off-street motor vehicle parking spaces required for specific uses or the

maximum number of parking spaces allowed, as set forth in Section 23.54.015 or elsewhere in this Title 23.

8. This Section 23.54.030 does not require EV supply equipment, as defined by Article 100 of the Seattle Electrical Code, to be installed.

Section 29. Section 23.84A.010 of the Seattle Municipal Code, last amended by Ordinance 126685, is amended as follows:

23.84A.010 "E"

* * *

"Essential public facilities" within the City of Seattle means airports, sewage treatment plants, jails, light rail transit systems, and power plants.

"EV-ready" means a minimum 40-ampere dedicated 208- or 240-volt branch circuit (32-amp load) terminated at a junction box or receptacle outlet in close proximity to a parking space.

* * *

Section 30. Section 23.84A.025 of the Seattle Municipal Code, last amended by Ordinance 127099, is amended as follows:

23.84A.025 "M"

* * *

"Major retail store" means a structure or portion of a structure that provides adequate space of at least eighty thousand (80,000) square feet to accommodate the merchandising needs of a major new retailer with an established reputation, and providing a range of merchandise and services, including both personal and household items, to anchor downtown shopping activity

around the retail core, thereby supporting other retail uses and the area's vitality and regional draw for customers.

"Major transit stop" means:

1. Stops on a bus route operated by Sound Transit;

2. Commuter rail stops;

3. Stops on light rail, street car, or trolley bus systems;

4. Stops on bus rapid transit routes; and

5. Any future stop on a bus rapid transit route funded for development and projected for construction within an applicable six-year transit plan under RCW 35.58.2795.

* * *

"Mid-block corridor" means an amenity feature that provides open space and publicly accessible connections across extremely long blocks to mitigate transportation impacts of new development by improving pedestrian circulation in high density areas, including but not limited to the South Lake Union Urban Center, the University Community Urban Center west of 15th Avenue NE, the Uptown Urban Center, the Northgate Urban Center, and the Downtown Urban Center east of Interstate 5.

"Middle housing" means any of the following residential uses, provided that they are located in structures that do not exceed a height limit of 32 feet not including roofs or rooftop features allowed in the underlying zone, as measured in Section 23.86.006:

1. Accessory dwelling unit

2. Adult family home

3. Apartment

4. Carriage house

5. Congregate residence

6. Cottage housing development

7. Low-income housing

8. Mobile home

9. Multifamily residential use

10. Permanent supportive housing

11. Rowhouse development

12. Single-family dwelling unit

13. Townhouse development

* * *

Section 31. Section 23.84A.036 of the Seattle Municipal Code, last amended by Ordinance 126157, is amended as follows:

23.84A.036 "S"

* * *

"Short subdivision" means the division or redivision of land into nine (((~~9~~))) or fewer lots, tracts, parcels, sites, or divisions for the purpose of sale, lease, development, or financing.

"Short subdivision, zero lot line" means a short subdivision that conforms to the unit lot subdivision standards in Section 23.24.045.

* * *

"Subdivision" means the division or redivision of land into ten (((~~10~~))) or more lots, tracts, parcels, sites, or divisions for the purpose of sale, lease, or transfer of ownership.

"Subdivision, zero lot line" means a subdivision that conforms to the unit lot subdivision standards in Section 23.22.062.

* * *

Section 32. Section 25.09.240 of the Seattle Municipal Code, last amended by Ordinance 126509, is amended as follows:

25.09.240 Short subdivisions and subdivisions

* * *

D. Development standards for new lots in neighborhood residential zones. If new lots are created in neighborhood residential zones by short subdivision or subdivision, the following development standards apply based on the area of each new lot that is outside the environmentally critical areas listed in subsection 25.09.240.A, plus environmentally critical areas in which development is allowed pursuant to subsections 25.09.240.B.1, 25.09.240.B.2, and 25.09.240.B.3:

1. Lot coverage and lot coverage exceptions according to subsections 23.44.010.C and 23.44.010.D.

2. Height limits according to Section 23.44.012((~~, including the requirements of subsection 23.44.012.A.3~~)) if the area of the largest rectangle or other quadrilateral that can be drawn within the lot lines of the new lot outside the environmentally critical areas is less than 3,200 square feet.

* * *

Section 33: The City Council requests that the Seattle Department of Construction and Inspections (SDCI) report to the Council on changes made by the Washington State Building Code Council (SBCC) to the types of projects that are reviewed under the Washington Residential Code. The Council requests that SDCI report back to Council the later of January

2026 or after the SBCC makes final decisions on what changes the SBCC has made, and the City's work program to incorporate those changes into the Seattle Residential Code.

Section 34. The provisions of this ordinance are declared to be separate and severable. The invalidity of any clause, sentence, paragraph, subdivision, section, or portion of this ordinance, or the invalidity of its application to any person or circumstance, does not affect the validity of the remainder of this ordinance or the validity of its application to other persons or circumstances.

Section 35. This ordinance shall take effect as provided by Seattle Municipal Code Sections 1.04.020 and 1.04.070 or on June 30, 2025, whichever is later.

Passed by the City Council the 27th day of May, 2025, and signed by me in open session in authentication of its passage this 27th day of May, 2025.

Sara Nelson

President _____ of the City Council

☑ Approved / ☐ returned unsigned / ☐ vetoed this 28th day of May, 2025.

Bruce A. Harrell

Bruce A. Harrell, Mayor

Filed by me this 28th day of May, 2025.

Scheereen Dedman, City Clerk

(Seal)

Attachments:

1. City Council Topics for Permanent Legislation to implement State Land Use Regulations

City Council Topics for Permanent Legislation to implement State Land Use Regulations

The City Council understands the long-term importance of permanent legislation to implement Washington State's land use mandates and intends to carefully consider the implications of the legislation on the City's ability to be a welcoming, accessible, affordable, livable and safe city. In pursuit of those goals, the City will consider the following concepts in its review of the Comprehensive Plan and permanent legislation:

1. Supporting measures to reduce displacement pressure, such as:
    a. Supporting a variety of housing types, to address the needs of households of different sizes, people with different accessibility requirements, and families at different income levels;
    b. Supporting lot splitting;
    c. Considering opportunities to support utility connections;
    d. Incorporating strategies to help protect homeowners from predatory developers; and
    e. Considering bonuses for community land trusts;
2. Considering whether residential densities should be based on the number of units on a lot or the square footage per unit;
3. Considering whether Accessory Dwelling Units should be counted toward determining the density of development on a lot;
4. Considering consistent and appropriate thresholds for street, alley, driveway, and pedestrian improvements;
5. Clarifying "designated non-disturbance areas in steep slopes" and reviewing density limits and development standards for properties with steep slope critical areas;
6. Considering adjustments to setbacks and amenity area regulations to maximize tree protection and support retention of existing trees during development and support flexibility in design to address neighborhood needs and provide buffers along major thoroughfares;
7. Considering whether to extend the City's Mandatory Housing Affordability program (Chapter 23.58C Seattle Municipal Code) to Neighborhood Residential zones; such consideration would be informed by information, analyses, and policy proposals that are currently being developed for permanent legislation by the Mayor and Council;
8. Supporting a diversity of housing options near public amenities, goods, and services;
9. Considering the modification of off-street parking requirements to support City goals for neighborhoods accessible by pedestrians, people with disabilities, bicyclists, transit users, and others who do not drive; and
10. Clarifying that the scope of provisions for NR zones do not preclude regulation of cladding materials for qualifying historic districts and landmarks pursuant to SB 5571.

SUMMARY and FISCAL NOTE

Department:	Dept. Contact:	CBO Contact:
Office of Planning & Community Development (OPCD)	Brennon Staley	Christie Parker

1. BILL SUMMARY

Legislation Title: AN ORDINANCE relating to land use and zoning; implementing a major update of Neighborhood Residential zones and modifying development standards in other zones to comply with various state laws; amending Chapter 23.32 of the Seattle Municipal Code at pages 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 98, 99, 100, 102, 103, 104, 105, 106, 107, 111, 112, 113, 114, 117, 118, 119, 120, 121, 122, 123, 124, 125, 126, 131, 132, 133, 134, 135, 136, 137, 138, 139, 140, 143, 144, 145, 146, 147, 148, 149, 150, 151, 152, 153, 156, 157, 158, 159, 160, 161, 162, 163, 164, 165, 166, 167, 168, 170, 171, 172, 173, 174, 175, 176, 177, 178, 179, 180, 181, 182, 183, 184, 186, 187, 188, 189, 190, 191, 192, 193, 194, 195, 196, 197, 198, 199, 200, 201, 203, 204, 205, 206, 207, 208, 209, 210, 211, 212, 213, 214, 216, 217, 219, 220, and 221 of the Official Land Use Map; amending Chapters 6.600, 14.08, 14.09, 15.32, 21.49, 22.214, 22.801, 22.907, 23.22, 23.24, 23.28, 23.30, 23.34, 23.42, 23.45, 23.47A, 23.48, 23.49, 23.50, 23.51A, 23.51B, 23.53, 23.54, 23.58C, 23.60A, 23.66, 23.72, 23.75, 23.76, 23.80, 23.84A, 23.86, 23.90, 23.91, 25.09, and 25.11 of the Seattle Municipal Code; renumbering existing subsection 23.54.015.K of the Seattle Municipal Code as Section 23.54.037 and further amending the section; renumbering existing subsections 23.54.030.F, 23.54.030.G, 23.54.030.K, and 23.54.030.L as Sections 23.54.031, 23.54.032, 23.54.033, and 23.54.034 and further amending the sections; repealing Chapter 23.44 and Sections 23.34.010, 23.34.012, 23.34.013, 23.34.072, 23.42.130, 23.45.512, 23.45.531, 23.86.010, and 25.09.260 of the Seattle Municipal Code; adding a new Chapter 23.44 and new Sections 23.42.024, 23.42.132, 23.45.519, 23.80.006, 23.80.008, 23.80.010, 25.09.055, and 25.11.025 to the Seattle Municipal Code; and repealing Ordinance 127219.

Summary and Background of the Legislation:

This legislation would implement a comprehensive update of Neighborhood Residential zones to comply with Washington State House Bill 1110 and to meet other goals. House Bill 1110 (also known as the "Middle Housing bill") requires cities to allow a wider variety of housing types such as duplexes, triplexes, and stacked flats in primarily single-family zones, and places limits on the regulation of middle housing.

This legislation would also implement changes to comply with:

- House Bill 1293 which requires that design standards be "clear and objective"
- Senate Bill 6015 which places limits on requirements for off-street parking
- House Bill 1287 which establishes requirements for electric vehicle charging in new development

This legislation would replace interim regulations currently being considered by City Council to comply with a June 30, 2025, deadline to implement HB 1110.

A summary of the key development standards are shown below:

Maximum density	1 unit per 1,250 square feet of lot area except that, consistent with state law, at least four units are allowed on all lots, regardless of lot size, and six units within a quarter-mile walk of major transit or if two units are affordable
Floor area ratio (FAR)	The amount of floor area allowed is equal to the lot size times the FAR. Proposed FARs are: • 0.6 FAR for density below 1/4,000 sq ft (e.g., one unit on a 5,000 sq ft lot) • 0.8 FAR for density between 1/4,000 and 1/2,200 sq ft (e.g., two units on a 5,000 sq ft lot) • 1.0 FAR for density between 1/2,200 and 1/1,600 sq ft (e.g., three units on a 5,000 sq ft lot) • 1.2 FAR for density of at least 1/1,600 sq ft (e.g., four units on a 5,000 sq ft lot)
Lot coverage	50 percent
Height limit	32 feet plus a 5 foot pitched roof bonus
Minimum Amenity area requirement	• 20 percent of lot area • The minimum dimension for amenity area is 8 feet or, if the open space includes a circulation pathway serving multiple buildings, 11 feet • Amenity area may be private or shared • At least half of the amenity area must be at ground level. Only half of amenity area not at ground level counts toward this requirement.
Minimum setbacks and separations	• Front: 10 feet • Rear: 10 feet without an alley, 5 feet for ADUs, and zero feet with an alley • Side: 5 feet • Separation between buildings within property: 6 feet
Accessory dwelling units	Accessory dwelling units (ADUs) would count toward the density and floor area limits shown above and be subject to the same standards as principal dwelling units except for a maximum size limit of 1,000 square feet plus 250 square feet of garage.
Alternative standards for stacked flats	Stacked flats located on lots 6,000 square feet or greater and within ¼ mile of frequent transit are subject to an FAR of 1.4 and a density of 1 unit per 650 square feet.

Alternative standards for low-income housing	Low-income housing located on lots 6,000 square feet or greater and within ¼ mile of frequent transit are subject to an FAR of 1.8, a height of 42 feet, a density of 1 unit per 400 square feet and a lot coverage of 60%.

The legislation would also amend standards in other zones to comply with other state requirements.

Background
The City of Seattle has been working since 2022 to update our Comprehensive Plan. We are calling the updated plan the One Seattle Plan. The Plan is a roadmap for where and how Seattle will grow and invest in communities over the next 20 years, toward becoming a more equitable, livable, sustainable, and resilient city.

In 2023, the Washington State legislature passed a suite of bills that were intended to increase the production of housing and address our housing affordability crisis. These bills include:

- HB 1110 (also known as the "Middle Housing bill") which requires cities to allow 4 to 6 units on residentially-zoned lots and a wider variety of housing types such as duplex, triplexes, and stacked flats as well as placing limits on the regulation of middle housing
- HB 1337 which places limits on the regulation of accessory dwelling units
- HB 1293 which places limits on design review processes and requires that design standards be "clear and objective"

The Mayor's Recommended Plan was transmitted to Council in March 2025. Legislation to implement the Recommended Plan through zoning changes will be transmitted in two phases. This legislation would update development standards in Neighborhood Residential zones and make changes to comply with state law. A second piece of legislation (called "Centers and Corridors") to implement rezones in neighborhood centers, regional and urban center expansions, and frequent transit routes would be transmitted separately.

2. CAPITAL IMPROVEMENT PROGRAM

Does this legislation create, fund, or amend a CIP Project? ☐ **Yes** ☒ **No**

3. SUMMARY OF FINANCIAL IMPLICATIONS

Does this legislation have financial impacts to the City? ☒ **Yes** ☐ **No**

This legislation will not have any direct impacts to expenditures, revenues, or positions. However, it would have the following indirect impacts:

Tax Base
The legislation is likely to increase the construction of housing in Neighborhood Residential zones. Increased housing construction would bring in additional tax revenue directly through increased construction sales tax and REET tax and indirectly through an increase in property taxes and the number of residents in Seattle. While we don't have an estimate of likely increases

in housing and population, the Environmental Impact Statement for this legislation and the Centers and Corridors legislation analyzed the impact of 40,000 additional homes over 20 years. About half of these homes were in Neighborhood Residential zones.

Permit Review
This legislation is likely to increase the number of permits for housing that the City has to review but would also make changes to simplify the existing code. Increased permit review would be paid for by the permit fees on the additional volume of permits.

Information Technology, Education, & Outreach
Implementation of this legislation will require updating of zoning maps, GIS layers, websites, director's rules, and other public materials as well as minor changes to the software tracking tools such as Accela to account for new zone names. It is expected that this work will be accomplished using existing staff resources; however, if implementation occurs after June 30, 2025 when SDCI staffing resources will significantly decrease due to budget cuts, SDCI may seek to hire a short-term employee to assist with the implementation process and a separate budget request may be necessary. A memo prepared by SDCI is attached to this document with greater detail and cost estimates. Technology update costs outlined in the memo would be paid by SDCI from existing permit fees through an existing MOU with IT. Language translation costs outlined in the memo would be paid by SDCI permit fees most likely to DON through an existing process. Material update costs outlined in the memo would be paid for by SDCI permit fees.

4. OTHER IMPLICATIONS

a. Please describe how this legislation may affect any departments besides the originating department.

Fiscal impacts, described herein, are primarily on permitting departments including the Seattle Department of Construction and Inspections (SDCI), Department of Transportation (DOT), Seattle Public Utilities, (SPU), Seattle City Light (SCL), Seattle Fire Department (SFD), and the Department of Neighborhoods (DON).

b. Does this legislation affect a piece of property? If yes, please attach a map and explain any impacts on the property. Please attach any Environmental Impact Statements, Determinations of Non-Significance, or other reports generated for this property.

The legislation will apply to Neighborhood Residential Zones throughout Seattle. Neighborhood Residential zones represent about 2/3rds of Seattle. It would also have minor impacts on development regulations in other areas.

c. Please describe any perceived implication for the principles of the Race and Social Justice Initiative.

i. How does this legislation impact vulnerable or historically disadvantaged communities? How did you arrive at this conclusion? In your response please consider impacts within City government (employees, internal programs) as well as in the broader community.

This legislation would help address multiple equity issues by:

- reducing the cost of housing by increasing the supply of housing in order to address the competition for housing which is driving price increases
- allow for more home ownership opportunities in parts of Seattle where only detached homes and accessory dwelling units are currently allowed
- implement an affordable housing bonus in NR zones to support the development of this type of housing in areas where affordable housing is lacking.

ii. Please attach any Racial Equity Toolkits or other racial equity analyses in the development and/or assessment of the legislation. A summary of racial equity analysis is attached.

iii. What is the Language Access Plan for any communications to the public?
SDCI will provide a summary of the updated standards in the languages specified in their office's language access plan.

d. Climate Change Implications

i. Emissions: How is this legislation likely to increase or decrease carbon emissions in a material way? Please attach any studies or other materials that were used to inform this response.

This legislation will tend to encourage housing within Seattle compared to areas outside of Seattle. Consequently, it will help to reduce carbon emissions from transportation by locating new households in areas of transit, employment, and amenities.

ii. Resiliency: Will the action(s) proposed by this legislation increase or decrease Seattle's resiliency (or ability to adapt) to climate change in a material way? If so, explain. If it is likely to decrease resiliency in a material way, describe what will or could be done to mitigate the effects.

This legislation is not expected to substantially affect Seattle's resiliency.

e. If this legislation includes a new initiative or a major programmatic expansion: What are the specific long-term and measurable goal(s) of the program? How will this legislation help achieve the program's desired goal(s)? What mechanisms will be used to measure progress towards meeting those goals?

This legislation would implement the Mayor's proposed One Seattle Plan. No new initiative or major programmatic expansion is proposed.

5. CHECKLIST

☒ **Is a public hearing required?**

☒ **Is publication of notice with *The Daily Journal of Commerce* and/or *The Seattle Times* required?**

☐ **If this legislation changes spending and/or revenues for a fund, have you reviewed the relevant fund policies and determined that this legislation complies?**

☐ **Does this legislation create a non-utility CIP project that involves a shared financial commitment with a non-City partner agency or organization?**

6. ATTACHMENTS

Summary Attachments:
Summary Attachment 1 - SDCI Implementation Cost Memo
Summary Attachment 2 - One Seattle Plan RET Summary Report

Seattle Department of Construction & Inspections

MEMO

DATE: January 28, 2025

TO: Brennon Staley, Strategic Advisor, OPCD
Geoff Wentlandt, Manager, OPCD

FROM: Lisa Rutzick, Product Manager, SDCI

RE: Implementation Costs for Proposed 2025 Seattle Comprehensive Plan Legislation & Rezone Phase I

EXECUTIVE SUMMARY

SDCI has collaborated with Seattle IT to review the proposed legislation and identify costs needed to support implementation of the new zoning changes outlined in the anticipated 2025 Comprehensive Plan and related legislation. This memo identifies the additional technology, outreach and education resources needed to implement the proposed legislation within the timeline outlined and is intended to inform the fiscal notes that accompany the legislative packages.

ANTICIPATED COSTS

Based on our initial analysis and assumption of a 30-day effective date, SDCI expects the technology costs associated with the implementation of the Comp Plan legislation and Rezone Phase 1* to total approximately **$20,875**. Additionally, SDCI anticipates the costs associated with outreach materials to be **between $5,000 and $10,000**, depending on the outreach work undertaken by OPCD. Finally, if adoption and implementation is significantly delayed beyond June 30, 2025, supplementary staff capacity to assist with updating public information would cost approximately $25,500. More detailed information about the anticipated technology, education and outreach work is provided below.

TECHNOLOGY

The proposed legislation requires numerous updates to GIS zoning maps, data layers, as well as updates to SDCI's permit tracking system, Accela. We expect this new work will be primarily handled by SDCI's dedicated IT GIS liaison; the single existing resource dedicated to all GIS work at SDCI, with assistance from an additional analyst as available in the IT GIS workplan. Estimates for the time and costs necessary to implement this technology work are provided below in more detail:

*Please note that SDCI is not assessing implementation needs for the Phase 2 Rezone at this time.

Seattle Department of Construction & Inspections

Technology Updates: Implementation Costs

	Proposed Phases of Legislation	Estimated Costs w/ Added Staffing Resources **
1	Comp Plan Legislation Updates (Expected May/June 2025)* • Develop new Major Transit Service Area Layer • Update Frequent Transit Service Area Layer • Propagate layer updates • Update GIS SDCI reports • Coordination/quality assurance for updates to Accela script • Potential new layer/items • Project planning/management	(167 hours)
2	Phase 1 Rezone (Expected May/June 2025)* • Update zoning layers & zoning view layers, as well as other zoning derived layers • Update GIS SDCI reports • Coordination/quality assurance for updates to two Accela scripts • Communications/outreach to stakeholders • Project planning/management • Update Muni Code maps • Update IT GIS tree tracking data	$20,875
*The estimated implementation time assumes these pieces of legislation are adopted at the same time, with a 30-day effective date. **Technology estimates shown here assume in-house development at loaded IT rate of $125/hour.		

EDUCATION & OUTREACH

Along with staff training, thoughtful outreach aimed at educating Seattle residents on zoning changes and requirements is critical to successful compliance and ultimately, the success of the Comprehensive Plan. SDCI will rely heavily on OPCD's significant outreach efforts throughout the development of the Comprehensive Plan.

SDCI education and outreach is anticipated to include activities such as:

- Publicizing a phone line for in-language translation capability to answer questions and direct customers to informational resources.
- Content creation and updates to numerous references on the Seattle.gov web site, multiple public resources documents such as Tips, as well as the creation of new information materials. Potentially including translation of certain content.
- Development of staff training materials.
- Use of OPCD's press-release content to publicize adopted legislation on SDCI newsletter, list serve and social media, as well as coordination with DON to publish in their newsletter.
- Working with DON to publicize to the ethnic media sites and outlets.

Seattle Department of Construction & Inspections

With the exception of language translation, SDCI believes that it currently has in-house capacity to support the work to support the necessary outreach and education efforts. This resourcing may change, however, depending on the timing of the legislation adoption. Should the timeline deviate from the currently expected timeline, SDCI may require temporary staffing resources to update and make current our public facing information**. This assessment is based on our best estimates with the information available and the bill as drafted in December 2024. Updates or amendments could impact these estimates.

Outreach & Education Costs

Public Outreach	Estimated Costs	Notes
Translated content for webpage, informational materials and language line	$5,000-$10,000	• Offer informational resources in languages other than English, including the 'Top Tier' languages: traditional Chinese (Mandarin and Cantonese), Spanish, Vietnamese, Somali, Amharic, Korean, and Tagalog • Provision of education and accessible information required for the successful implementation of legislation
**Update public information materials	$25,500	• 3-month temporary Permit Specialist 1 FTE needed to support the updates if adoption and implementation is significantly delayed beyond June 30, 2025.

Thank you for your consideration and please do not hesitate to reach out with any questions.

One Seattle Plan Comprehensive Plan Update

Racial Equity Toolkit Summary

May 2025

Background

The City of Seattle is updating its Comprehensive Plan, a roadmap for where and how Seattle will grow and invest in communities over the next 20 years and beyond. Seattle last engaged in a citywide process to update its Comprehensive Plan a decade ago. This major update, the One Seattle Plan (Plan), sets a refreshed vision and charts a new roadmap for the future. Central to that vision is working toward a city where current and future residents can benefit from and experience racially equitable outcomes — a city where someone's race or ethnicity does not impact health, wellbeing, or access to opportunity, including housing.

A Racial Equity Toolkit (RET) is a process to guide the development of the goals and policies in this Plan in order to further racial equity. Conducting a RET is an iterative process of community engagement, analysis, policy development, and evaluation, with each step informing the next. With guidance from the Seattle Office of Civil Rights (SOCR), the Office of Planning and Community Development (OPCD) employed a RET process in developing the Mayor's Recommended One Seattle Plan.

This work included an analysis of the existing Seattle 2035 Comprehensive Plan, extensive racial equity data and analysis published in the One Seattle Plan Housing appendix, analysis of racial equity impacts in an Environmental Impact Statement, and enhanced public engagement with communities that have historically been marginalized from policy processes like a major update of the Comprehensive Plan. More complete documentation of each of these components of the RET can be found via the links provided.

Finally, the RET has resulted in key changes and additions to the City's policies that will guide actions by multiple departments over the next 20 years, including a new growth strategy and policies that promote racial equity added throughout the Plan.

Racial Equity Analysis of Seattle 2035 and Urban Village Strategy (2021)

A Statement of Legislative Intent (29-4-B-1-2019) adopted by City Council in 2019 requested that the OPCD, in consultation with the Department of Neighborhoods (DON) and SOCR, "prepare a racial equity analysis of Seattle's strategy for accommodating growth" as part of "pre-planning work in anticipation of the next major update to the Comprehensive Plan." To accomplish this work, OPCD contracted with PolicyLink, a national research and action institute dedicated to advancing racial and economic equity.

The project involved targeted outreach to historically marginalized communities and included a series of focus groups and a larger citywide stakeholder workshop in fall 2020. Participants included community members, organizations active in community development and advocacy around racial equity issues, and City boards and commissions. A community engagement summary report from this process can be found here.

PolicyLink's evaluation of the current Comprehensive Plan was informed by input from this public outreach and was also informed by a review of data analysis and documents related to the Comprehensive Plan and its implementation.

A final report from this process includes findings and recommendations from PolicyLink on what changes should be made in the Comprehensive Plan and how implementation can achieve more equitable outcomes. Topic areas included: housing supply and affordability, housing and neighborhood choice, jobs and economy, displacement, and community engagement. The final report can be found here.

Equitable Community Engagement

Beginning with the official launch of the One Seattle Plan process in spring 2022, OPCD engaged the public through several phases of community and stakeholder input oriented around key milestones in the Comprehensive Plan update process. These included early engagement and scoping for the Environmental Impact Statement (EIS) in 2022, engagement around key policy topics in the Plan in 2022 and 2023, feedback on the draft Plan and Draft EIS in spring 2024, and feedback on draft zoning changes in fall 2024.

Foundational community engagement goals for the One Seattle Plan were:

- Provide additional opportunities for communities that have been historically underrepresented in the City's planning and engagement processes, especially Black, Indigenous, and People of Color communities.
- Create opportunities for interaction and co-creation with community and stakeholders.

Equitable community engagement included a range of new and expanded strategies:

- DON Community Liaisons assisted with outreach to cultural communities, conducted focus groups, and provided translation services as needed.
- OPCD ensured language access to communities speaking all 7 of Seattle's Tier 1 languages through translated materials for community events, translation tools on project websites, and interpretation at key community engagement events.
- OPCD contracted with 8 community-based organizations (CBOs) to conduct tailored engagement with the members of communities they serve and produce reports of findings and recommendations for the Comprehensive Plan. The CBOs included Asian Pacific American Labor Alliance (APALA), Capitol Hill Eco District, Duwamish Valley Sustainability Association/ Duwamish Valley Youth Vision Project, Estelita's Library, Khmer Community of Seattle/King County/ Noio Pathways/ KIMYUNITY, Wa Na Wari/ CACE 21, and sləpiləbəxʷ (Rising Tides). Reports from each of the CBOs are available here.
- OPCD worked with key City boards and commissions for input on the Plan, including the Equitable Development Initiative Advisory Board, sləpiləbəxʷ (Rising Tides) Indigenous Planning Group, Green New Deal Oversight Board, Mayor's Council on African American Elders, and Seattle Immigrant and Refugee Commission, among others.
- Between June and July of 2023, OPCD facilitated stakeholder interviews with representatives from over 40 organizations working to address displacement in their communities.

A complete description of community engagement for the One Seattle Plan can be found here.

Data Analysis

The Comprehensive Plan update was informed by several rounds of data analysis that identified, quantified, and mapped equity related factors including historical and ongoing racial disparities, displacement risk, and racial outcomes associated with alternative growth scenarios.

One outcome of the last major Comprehensive Plan update, Seattle 2035, was the creation of the Equitable Development Initiative (EDI). In coordination with EDI, OPCD has analyzed and reported on data that show how the city is progressing toward equitable outcomes across neighborhoods and racial and cultural communities. The resulting Equitable Development Monitoring Program (link) was established to fulfill this role, publishing several reports and data dashboards in the years leading up to the One Seattle Plan process. As stated in the Plan's Introduction, it is OPCD's intent after adoption of the One Seattle Plan to continue similar monitoring work focusing on implementation and outcomes that impact racial equity.

The Community Indicators Report was released in 2020. This report contains data on housing, community and neighborhood access to opportunity, transportation, and access to education and economic opportunities, which collectively show ongoing disparities among demographic groups and areas of the city.

The Comprehensive Plan update process that led to the adoption of Seattle 2035 in 2015 and 2016 used a newly developed Displacement Risk Index map to inform growth strategy and anti-displacement policies. Alongside the Community Indicators Report, OPCD also produced a new data dashboard of Heightened Displacement Risk Indicators that complement the map. The One Seattle Plan update process built upon this prior work with an updated map (included in the Housing Appendix) and early work to update the dashboard and initiate a multi-departmental and data-informed effort to track and improve upon the City's existing anti-displacement toolbox.

The Plan update was informed by new and more complete documentation of a long history of racial discrimination in Seattle. The Housing Appendix includes a new section, Historical Context of Racist Housing and Land Use Practices, that details this history from initial colonization through highly discriminatory housing policies in the 20th century to conditions today that continue to result in racially disparate outcomes in housing and access to opportunity.

The Housing Appendix includes additional data and analysis explicitly directed at identifying racial disparities. Data on households shows ongoing differences across racial and cultural communities in income, homeownership, and housing cost burden. A Geographic Analysis of Racial and Social Equity in Housing explores patterns of segregation within the city and neighborhood disparities in housing affordability and access to opportunities that intersect with race.

Racial equity was also incorporated into environmental review for the One Seattle Plan. As part of the scoping process in Fall 2022, OPCD identified equity metrics that were to be addressed in the Environmental Impact Statement analysis. The One Seattle Comprehensive Plan EIS evaluated six growth strategy alternatives for potential impacts to the built and natural environment. Elements of the environment that were studied included earth and water quality, air quality/GHG, plants and animals, energy and natural resources, noise, land use patterns, historic resources, population, employment and housing, transportation, and public services and utilities. For each element historical inequities related to each topic area are documented. Where environmental impacts for

any of the alternatives are identified, consideration is given to whether there are racial disparities in how these impacts are experienced and mitigation measures are identified.

Goals and Policies in the One Seattle Plan

The RET process informed and shaped the final Mayor's Recommended One Seattle Plan, with goals, policies, and implementation approaches that are explicitly designed to promote equity and opportunity broadly and specifically address the impacts of historical racism and persistent racial disparities.

The Introduction to the Plan describes four "key moves" which include housing and affordability, equity and opportunity, community and neighborhoods, and climate and sustainability, all of which describe the broad objectives of the Plan to foster a more equitable city as we grow and invest in the future.

A centerpiece of the Plan is the newly revised growth strategy, which provides direction on the types and locations of development, particularly housing, to meet our needs for housing supply, diversity, and affordability over the next 20 years. The proposed growth strategy addresses the legacy of racially exclusive zoning through implementation of HB 1110 (the new state "middle housing" requirement) and with proposed locations for denser housing, including more affordable rental housing, in more places across the city, including new Neighborhood Centers and transit corridors located in areas with high access to opportunity and few housing options now. These changes were designed to reduce market pressures that are contributing to high housing costs and displacement of low income and communities of color and to promote opportunities and incentives for affordable housing development.

In addition to the Growth Strategy element, the proposed One Seattle Plan includes significant changes to 10 topical policy elements, changes that include adding and strengthening goals and policies that promote racial equity and anti-displacement strategies. Highlights include:

- In the Transportation element, a new Creating an Equitable Transportation System section with policies on transportation equity, including promotion of affordability, equitable access, and investments in underserved areas of the city.
- In the Housing element, a new Housing Security and Stable Communities section with expanded goals and policies on anti-displacement.
- In the Housing element, new and expanded policies underscoring the role of community ownership of land, proactive involvement of groups historically excluded from and burdened by housing policies, and support for lower- and moderate-income homeowners to achieve stability and wealth creation through development on their properties.
- In the Capital Facilities element, a new Equitable Capital Facilities and Service section
- In the Utilities element, expanded policies on equitable service provision to address all utilities as well as specific issues, such as affordability and community impacts.
- In the Economic Development element, policies promoting small business ownership, particularly among historically marginalized communities.
- In the Climate and Environment element, a Carbon Pollution Reduction subelement that emphasizes strategies consistent with a just transition away from fossil fuels.

- In the Climate and Environment element, a Healthy, Resilient Communities and Environment subelement that promotes strategies to achieve an equitable distribution of investments to mitigate climate impacts.
- In the Parks and Open Space element, new policies emphasizing equitable access and community partnerships, enhancing and indigenous culture and practice
- In the Arts and Culture element, new narrative and policies recognizing and promoting Indigenous arts and culture.
- In the Community Involvement element, a strong orientation around equitable engagement with goals and policies related to partnerships, community capacity building, and engagement with Indigenous communities.