

NOTICE OF AVAILABILITY OF ADDENDUM FOR COUNCIL CHANGES TO THE ONE SEATTLE COMPREHENSIVE PLAN AND IMPLEMENTING REGULATIONS

Addendum available for public review.

Proposal: On January 30, 2025, the Office of Planning and Community Development (OPCD) issued a Final Environmental Impact Statement (EIS) for the proposed One Seattle Comprehensive Plan.

Seattle’s Comprehensive Plan defines the vision for how the city will grow — guiding decisions about where to locate housing and jobs — and identifies where to invest in city services and facilities. The EIS evaluated six alternative growth strategies (including a no action alternative and a preferred alternative) and associated development regulations for potential impacts to the built and natural environment. Development regulations that were studied in the EIS would implement the City’s proposed growth strategy and bring the City into compliance with recent state legislation that mandated certain housing densities (middle housing).

On September 18, 2025, the Council’s Select Committee on the Comprehensive Plan recommended that the Council pass as amended [Council Bill \(CB\) 120985](#), which would repeal and replace the Comprehensive Plan and make other associated changes to the Seattle Municipal Code (SMC). On September 19, 2025, the Council’s Select Committee on the Comprehensive Plan recommended that the Council pass as amended [\(CB\) 120993](#), which implements the Comprehensive Plan by (1) modifying development standards applicable to Neighborhood Residential, Residential Small Lot, and multifamily zones designations and (2) making other changes to meet state-mandated requirements for middle housing. Amendments considered, with vote tally sheets, are available in the legislative record for each bill.

Study Area: The proposal addresses all land within the City of Seattle, including areas that are zoned Neighborhood Residential (NR), Residential Small Lot (RSL), Lowrise Residential (LR) and all other zones where middle housing is allowed.

Addendum: Pursuant to WAC 197-11-600 and SMC 25.05.600, OPCD issues this EIS addendum to add analysis and information about Council committee changes to the proposed One Seattle Comprehensive Plan (CB 120985) and implementing regulations for middle housing (CB 120993). EIS addenda are not appealable to the City Hearing Examiner.

Timing of Implementation:

The City Council will act on CB 120985 and CB 120993 no sooner than December 16, 2025.

Review and Comment Period: Comments on this EIS addendum may be submitted to jim.holmes@seattle.gov and ketil.freeman@seattle.gov by 5PM on December 9, 2025.

Contact Persons:

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Location of Documents and Background Information: Please see the project website for the Final EIS, EIS addendum and other related studies and documents [Environmental Impact Statement - OPCD | seattle.gov](#). This addendum is also available with the legislative records for [CB 120985](#) and [CB 120993](#) through the City Clerk website at <https://seattle.legistar.com/Legislation.aspx>



Seattle

One Seattle Comprehensive Plan Update

Addendum 11-2025 to the Final Environmental Impact Statement For the One Seattle Comprehensive Plan

November 2025

**Prepared by:
BERK Consulting
Fehr & Peers
Historical Research Associates
MAKERS
Parametrix**

ADOPTION OF EXISTING ENVIRONMENTAL DOCUMENT

Adoption for: Environmental Impact Statement

Description of current proposal: One Seattle Comprehensive Plan Update, including One Seattle Zoning Update, changes made to the center boundaries after the FEIS publication and prior to Council review, and Council Select Committee Recommended Amendments, referred to collectively as the Revised Proposal.

Proponent: Office of Planning and Community Development, City of Seattle.

Location of current Proposal: Seattle city limits

Title of Document Being Adopted: One Seattle Comprehensive Plan Final Environmental Impact Statement

Date Prepared: January 30, 2025

We have identified and adopted this document as being appropriate for this proposal after independent review. The document meets our environmental review needs for the current proposal and will accompany the proposal to the decision maker.

Name of agency adopting document: City of Seattle, Office of Planning and Community Development.

Contact Person: Jim Holmes, (206) 684-8372 or jim.holmes@seattle.gov

Responsible Official: Rico Quirindongo, Director, City of Seattle Office of Planning and Community Development

Signature: On File

Date: November 24, 2025



FACT SHEET

Project Title

One Seattle Comprehensive Plan Update: changes made to the center boundaries after the FEIS publication and prior to Council review, and Council Amendments, referred to collectively as the Revised Proposal.

Proposed Action and Alternatives

Legislation is proposed to update Seattle’s Comprehensive Plan, which is the vision for how Seattle grows and makes investments, and implementing development standards.

For additional information please see the One Seattle Comprehensive Plan Update, Final Environmental Impact Statement, January 30, 2025.

Proponent and Lead Agency

City of Seattle Office of Planning and Community Development

Location

Seattle city limits

Tentative Date of Implementation

2025

Responsible SEPA Official

Rico Quirindongo
Director, Office of Planning & Community Development
City of Seattle Office of Planning and Community Development
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Contact Person

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Required Approvals

The One Seattle Plan and all related regulatory updates were forwarded to the City Council who will deliberate and determine approval.

State agencies review per the Growth Management Act and regional agencies such as the Puget Sound Regional Council provide review and certification related to VISION 2050. Housing policies are reviewed by the King County Affordable Housing Committee in accordance with King County Countywide Planning Policies.

Authors and Contributors

Under the direction of the City of Seattle, the consultant team prepared the Addendum as follows:

- [BERK Consulting](#) (prime): SEPA documentation; Land Use & Shoreline Patterns; Housing; Public Services
- [Fehr & Peers](#): Transportation
- [Historical Research Associates](#): Cultural Resources
- [MAKERS](#): Urban Form
- [Parametrix](#): Plants & Animals

Final EIS Date of Issuance/Prior Environmental Review

The One Seattle Comprehensive Plan Final EIS was issued on January 30, 2025.

Date of Addendum Issuance

November 24, 2025

Date of Final Action

December 16, 2025

Location of Background Data

You may review the City of Seattle website for more information at <https://www.seattle.gov/opcd/one-seattle-plan/project-documents/environmental-impact-statement>. Legislative records for the Revised Proposal are available through the Seattle City Clerk website at <https://seattle.legistar.com/Legislation.aspx>. Reference Council Bill ([CB 120985](#)) for the Comprehensive Plan and [CB 120993](#) for Phase 1 legislation including Permanent HB 1110 legislation. Please see the contact person above if you desire clarification or have questions.

Availability of Addendum

The Addendum can be downloaded from the City of Seattle's website at <https://www.seattle.gov/opcd/one-seattle-plan/project-documents/environmental-impact-statement>. Consistent with WAC 197-11-625 the addendum is circulated to the recipients of the One Seattle Comprehensive Plan Final EIS.

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1 PURPOSE & PROPOSAL

1.1 Purpose

This addendum provides analysis of the changes made to the center boundaries after the FEIS publication and before Council review, and Seattle City Council Select Committee’s Recommended Package of Amendments to the Mayor’s One Seattle Comprehensive Plan. Combined, these changes are referred to as the Revised Proposal throughout this addendum and are described in the context of the Final Environmental Impact Statement (FEIS) Preferred Alternative and its environmental analysis. The addendum addresses the following environmental subjects that could be affected by the Revised Proposal:

- Plants and Animals
- Land Use and Urban Form
- Housing
- Transportation
- Public Services
- Cultural Resources

This addendum provides additional information or analysis that does not substantially change the analysis of significant impacts and alternatives in the existing environmental document (WAC 197-11-706).

1.2 Summary of Proposed Changes

The legislation for the Comprehensive Plan ([CB 120985](#)) that was reviewed by Council contained a number of changes to center boundaries based on public feedback received in Fall 2024 that were not included in the FEIS. Small revisions were made to the Bryant, Endolyne (now Fauntleroy), Madison Park, Madrona, Magnolia Village, Montlake, North Magnolia, West Green Lake (now Northwest Green Lake), and Whittier Neighborhood Centers as well as the Admiral, Greenwood, Morgan Junction, Pinehurst-Haller Lake, and Upper Queen Anne Urban Centers. These changes are described and studied in this addendum.

The Select Committee on the Comprehensive Plan, chaired by Councilmember Joy Hollingsworth (District 3), also voted 9-0 to recommend that the City Council approve amended

legislation for the Comprehensive Plan ([CB 120985](#)) and Phase 1 legislation including Permanent HB 1110 legislation ([CB 120993](#)). These changes are studied in this addendum and referred to as the Council Select Committee Amendments throughout. The Select Committee also recommended that the City Council pass [Resolution 32183](#) which authorizes certain policy objectives to receive greater environmental review for consideration in 2026; since those objectives will be subject to separate review in 2026, they are not covered in this addendum.

This addendum adds updated information and analysis to the FEIS based on the Revised Proposal—considering changes made to the center boundaries after the FEIS (prior to Council Amendments) and changes to the One Seattle proposal as recommended by the Select Committee including legislation for the Comprehensive Plan ([CB 120985](#)) and Phase 1 legislation including Permanent HB 1110 legislation ([CB 120993](#))

1.2.1 One Seattle Comprehensive Plan

FEIS Preferred Alternative Plan—Features in Common

Under both the FEIS Preferred Alternative and the Revised Proposal, growth is directed and supported by new plan elements addressing land use, housing, economic development, utilities, transportation, climate change and resiliency, and more. The long-term Seattle Transportation Plan concepts are implemented during the 20-year planning period by the Transportation Element and Capital Facilities Plan.

Policy Amendments by Element

A series of legislative amendments by element are disclosed and analyzed as summarized below:

Land Use Related Policies

Land Use related policies including Urban Form Policies support economic development such as industrial areas, including limiting housing. Limitation of housing in industrial areas was studied in the Industrial and Maritime Strategy EIS. Other policies support small businesses, food systems, and services that support families such as childcare and groceries. Policies allow for taller buildings in Neighborhood Centers, similar to the FEIS Preferred Alternative. These policies include:

- Amendment 1: Incorporate childcare into the Comprehensive Plan.
- Amendment 3: Amend Comprehensive Plan discussion of industrial areas to highlight importance of maritime industrial employment lands.
- Amendment 4: Amend the Comprehensive Plan to limit housing in the Stadium District.
- Amendment 5: Amend the Comprehensive Plan to support grocery stores in food deserts.

- Amendment 21: Amend the Comprehensive Plan to discourage concentration of human service uses.
- Amendment 27: Amend the Comprehensive Plan to provide policy direction regarding food access.
- Amendment 33: Amend Comprehensive Plan policies to allow taller buildings in Neighborhood Centers.

Housing Related Policies

Policies further support a wide range of housing types that are affordable and reduce displacement consistent with the Growth Management Act (GMA). These policies include:

- Amendment 2: Add a policy to the Comprehensive Plan to support anti-displacement and equitable development pilots.
- Amendment 6: Amend the Comprehensive Plan to support multigenerational housing.
- Amendment 17: Reference social housing in the Comprehensive Plan.
- Amendment 18: Amend the Comprehensive Plan to provide policy direction regarding housing and healthy environments.
- Amendment 19: Amend the Comprehensive Plan to add a goal for multi-bedroom units.
- Amendment 20: Amend the Comprehensive Plan to support cultural housing for seniors.

Transportation Related Policies

Transportation policies would further support compact and transit-oriented development by limiting parking. Other policies would additionally reinforce active transportation (sidewalks) and emphasize capital maintenance and replacement policies for transportation infrastructure. These policies include:

- Amendment 8: Amend the Comprehensive Plan to apply maximum parking limits in regional centers.
- Amendment 9: Amend Comprehensive Plan policy related to priority for freight movement.
- Amendment 10: Amend the Comprehensive Plan to add a policy on transit security.
- Amendment 11: Amend the Comprehensive Plan to revise a policy on missing sidewalks.
- Amendment 12: Amend the Comprehensive Plan to add a policy on transportation infrastructure.
- Amendment 14: Amend the Comprehensive Plan to add policies on pavement and bridge condition.
- Amendment 15: Amend the Comprehensive Plan to add a pothole policy.

Climate & Environment Element / Environmental Justice Related Policies

Adding to the draft Climate Element in the One Seattle Plan, amendments would address a number of policies meant to reduce greenhouse gas and improve resilience:

- Amendment 13: Amend the Comprehensive Plan to revise a policy on electric vehicle charging.
- Amendment 16: Amend the Comprehensive Plan to revise policy on low-carbon/low-pollution neighborhoods.
- Amendment 23: Amend the Comprehensive Plan to expand policy on balancing utility infrastructure costs.
- Amendment 28: Amend the Climate and Environment Element to highlight trees, bees, salmon, orca, and herons.

Economic Development Related Policies

In addition to land use-related policies that support economic development and jobs, the following amendments address additional aspects of the workforce and small businesses:

- Amendment 24: Amend Comprehensive Plan policies related to workforce development and economic self-sufficiency.
- Amendment 25: Amend the Comprehensive Plan to voice support for the smallest locally owned businesses.

Parks & Open Space / Arts & Culture Related Policies

Policy amendments further address parks, open space, environmental sustainability, and cultural resources:

- Amendment 26: Amend the Comprehensive Plan to provide policy direction for sustainable public and private open space, tree, and vegetation management.
- Amendment 29: Amend the Comprehensive Plan to support the development of parks in regional urban centers.
- Amendment 30: Amend the Comprehensive Plan to support the development of community centers in regional and urban centers.
- Amendment 31: Amend the Comprehensive Plan to support the creation of cultural gathering places.

Public Safety Related Policies

The City added a new chapter:

- Amendment 32: Add a Public Safety Element to the Comprehensive Plan.

Land Use Plan Amendments

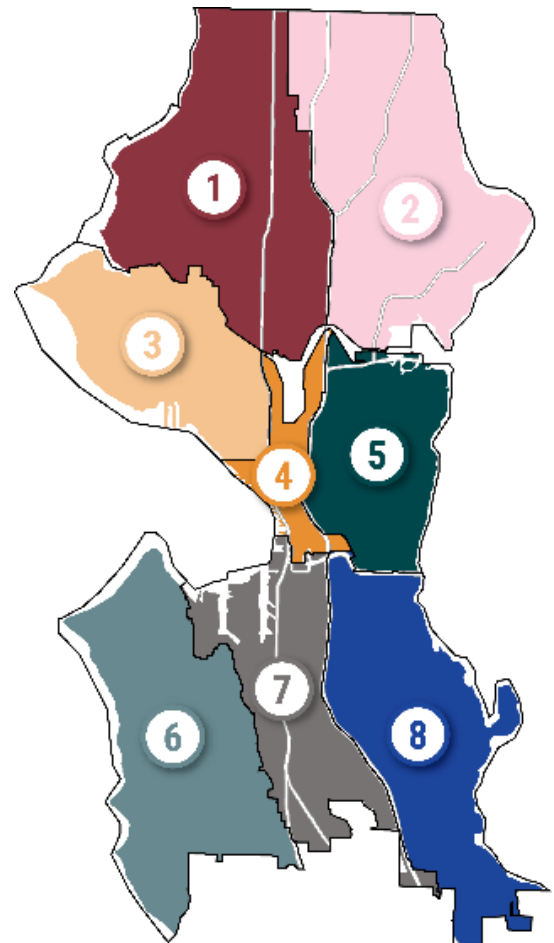
The FEIS Preferred Alternative and the Revised Proposal growth strategies have several features in common:

- Both have Regional Centers (7) and Urban Centers (25)
 - Ballard would become a regional center.
 - A new urban center is located at NE 130th Street Light Rail Station (renamed to Pinehurst–Haller Lake).
 - Expansions are located at new light rail stations. This includes expansion of the First Hill/Capitol Hill Regional Center and 23rd & Union–Jackson Urban Center (split into the Central District and Judkins Park/Central District South Urban Centers under both the FEIS Preferred Alternative and Revised Proposal).
- Neighborhood Centers (30)
 - Under both the FEIS Preferred Alternative and the Revised Proposal there would be 30 Neighborhood Centers.
 - Under both the FEIS Preferred Alternative and the Revised Proposal new neighborhood centers were expanded, revised, or shifted.
- Urban Neighborhood: The urban neighborhood place type is implemented with updated NR zoning to fulfill middle housing requirements in HB 1110 as well as implemented with upzones along frequent transit arterials.

Some differences between the FEIS Preferred Alternative and the Revised Proposal include:

- A new East Ballard Neighborhood Center under the Revised Proposal that was not identified under the FEIS Preferred Alternative.
- Removal of the Phinney Ridge Neighborhood Center under the Revised Proposal that was in the FEIS Preferred Alternative.
- The legislation reviewed by Council prior to amendments included some small revisions to the Bryant, Endolyne (now Fauntleroy), Madison Park, Madrona, Magnolia Village, Montlake, North Magnolia, West Green Lake (now Northwest Green Lake), and Whittier Neighborhood Centers as well as the Admiral, Greenwood, Pinehurst-Haller Lake, and Upper Queen Anne Urban Centers. These changes are studied in this addendum.

Exhibit 1-1. Study Areas



Sources: City of Seattle, 2025; BERK, 2025.

Additional area-specific changes to centers, including in Council amendments, are described below based on study areas.

Exhibit 1-2 through **Exhibit 1-9** map proposed changes to the center boundaries by analysis area as compared to the FEIS Preferred Alternative boundaries. See also **Appendix B** for maps of individual center boundary revisions.

All Areas

- Amendment 53: Threshold for pedestrian improvements in centers.

Area 1 Changes to Centers

- Amendment 42: Add an East Ballard Neighborhood Center and remove the Phinney-Ridge Neighborhood Center.
- Amendment 48: Amend the boundary of the Upper Fremont Neighborhood Center.
- Amendment 49: Amend the boundary of the West Green Lake Neighborhood Center. Note the boundaries were also revised after the FEIS but prior to Council Amendments.
- Amend the boundaries of the Greenwood Urban Center and the Whittier Neighborhood Center (changes made after the FEIS but prior to Council Amendments).

Area 2 Changes to Centers

- Amendment 40: Amend the boundary of the Ravenna Neighborhood Center.
- Amend the boundaries of the Pinehurst-Haller Lake Urban Center and Bryant Neighborhood Center (changes made after the FEIS but prior to Council Amendments).

Area 3 Changes to Centers

- Amendment 44: Amend the boundary of the Magnolia Village Neighborhood Center. Note the boundaries were also revised after the FEIS but prior to Council Amendments.
- Amendment 45: Amend the boundary of the North Magnolia Neighborhood Center. Note the boundaries were also revised after the FEIS but prior to Council Amendments.
- Amendment 51: Remove areas north of Roy Street from the Uptown Regional Center and add them to the renamed Queen Anne Urban Center. Note the boundaries were also revised after the FEIS but prior to Council Amendments.

Area 4 Changes to Centers

- None.

Area 5 Changes to Centers

- Amendment 38: Amend the boundary of the Madrona Neighborhood Center. Note the boundaries were also revised after the FEIS but prior to Council Amendments.
- Amendment 114: Rename the Judkins Park Urban Center to Central District South.

- Amend the boundaries of the Madison Park and Montlake Neighborhood Centers (changes made after the FEIS but prior to Council Amendments).

Area 6 Changes to Centers

- Amendment 35: Rename the Endolyne Neighborhood Center to Fautleroy and amend the boundaries. Note the boundaries were also revised after the FEIS but prior to Council Amendments.
- Amendment 36: Amend the boundary of the High Point Neighborhood Center.
- Amendment 37: Amend the boundary of the Morgan Junction Urban Center. Note the boundaries were also revised after the FEIS but prior to Council Amendments.
- Amend the boundary of the Admiral Urban Center (changes made after the FEIS but prior to Council Amendments).

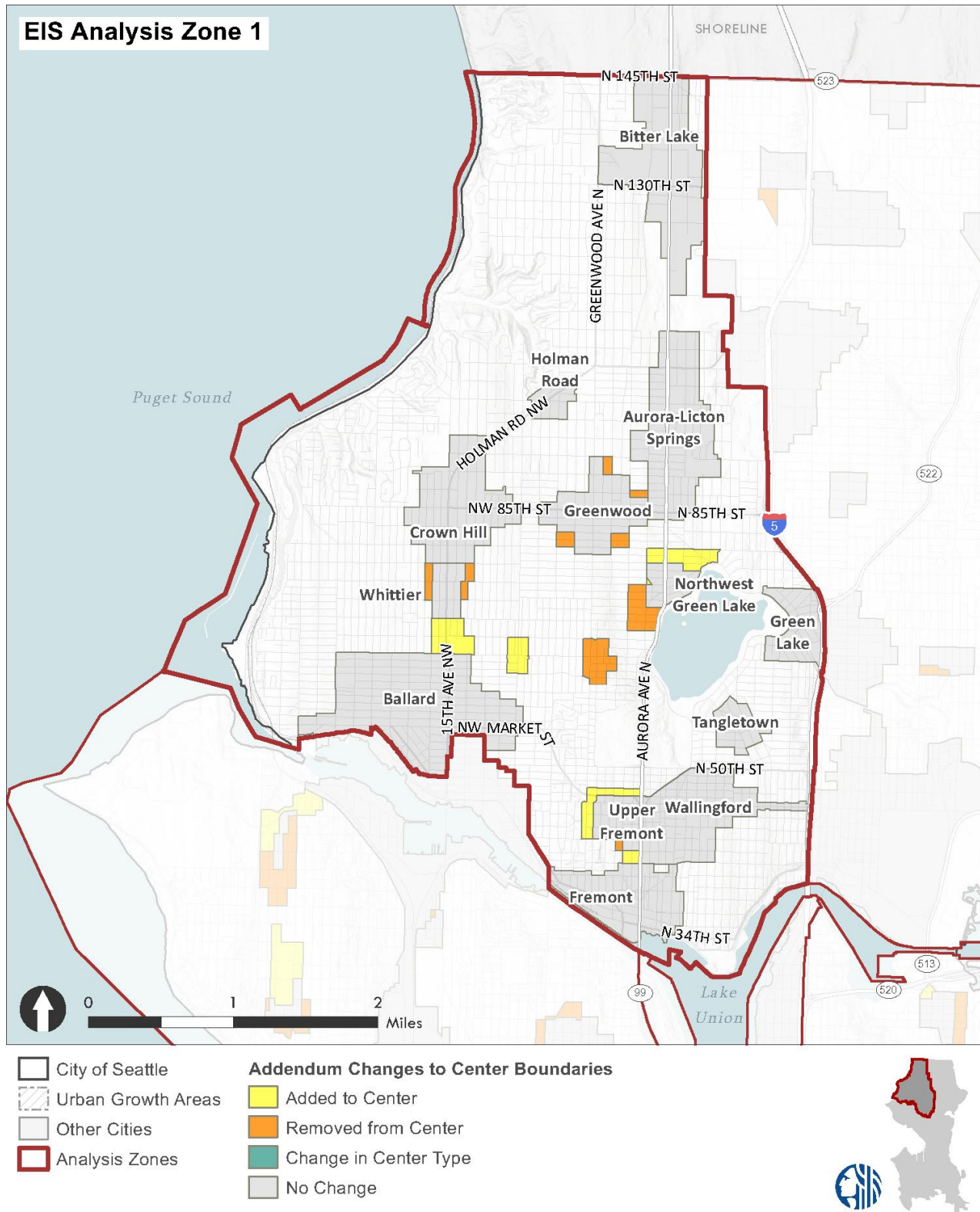
Area 7 Changes to Centers

- None.

Area 8 Changes to Centers

- None.

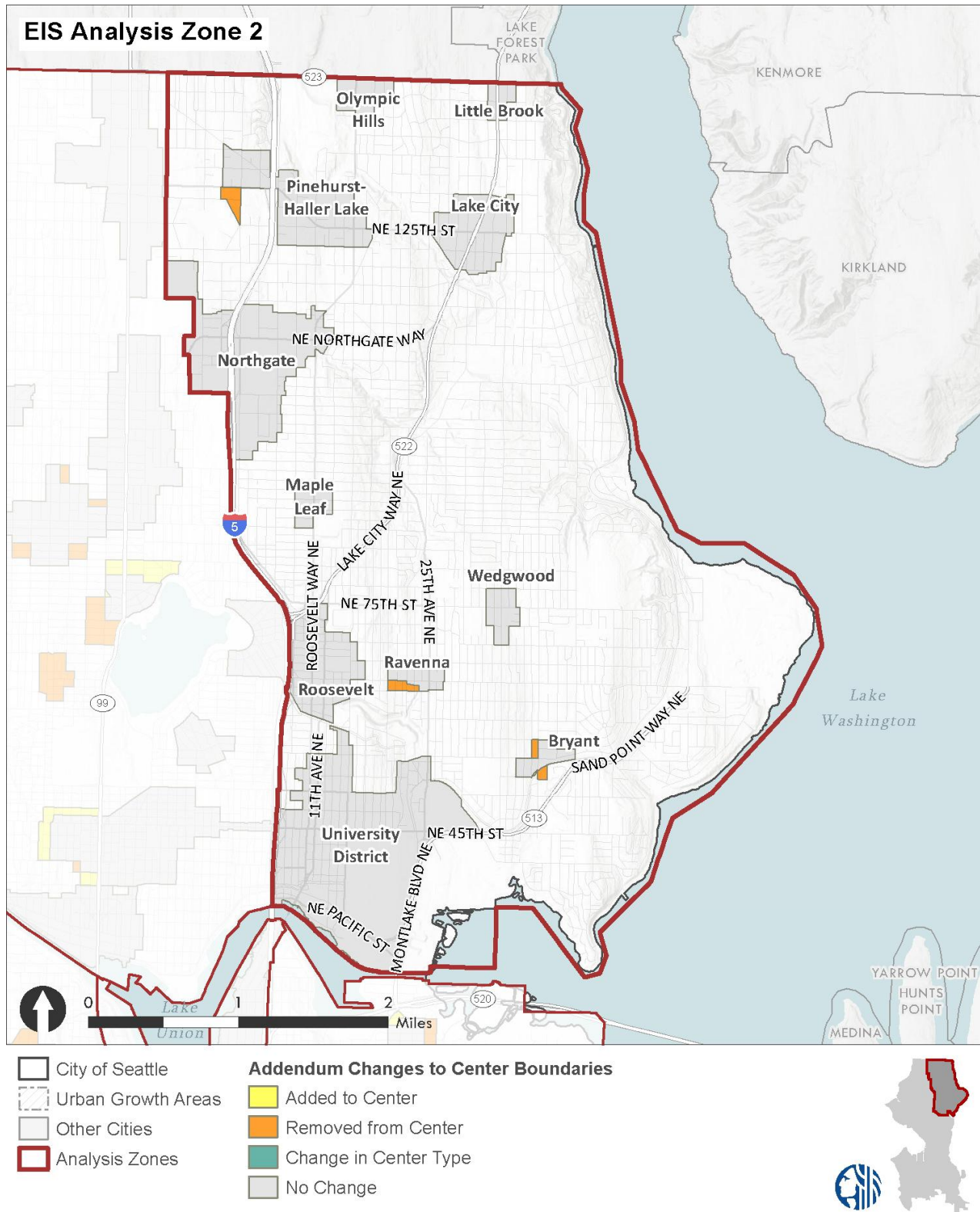
Exhibit 1-2. Revised Proposal Center Boundary Revisions—Area 1



Map Date: November 2025

Sources: City of Seattle, 2025; BERK, 2025.

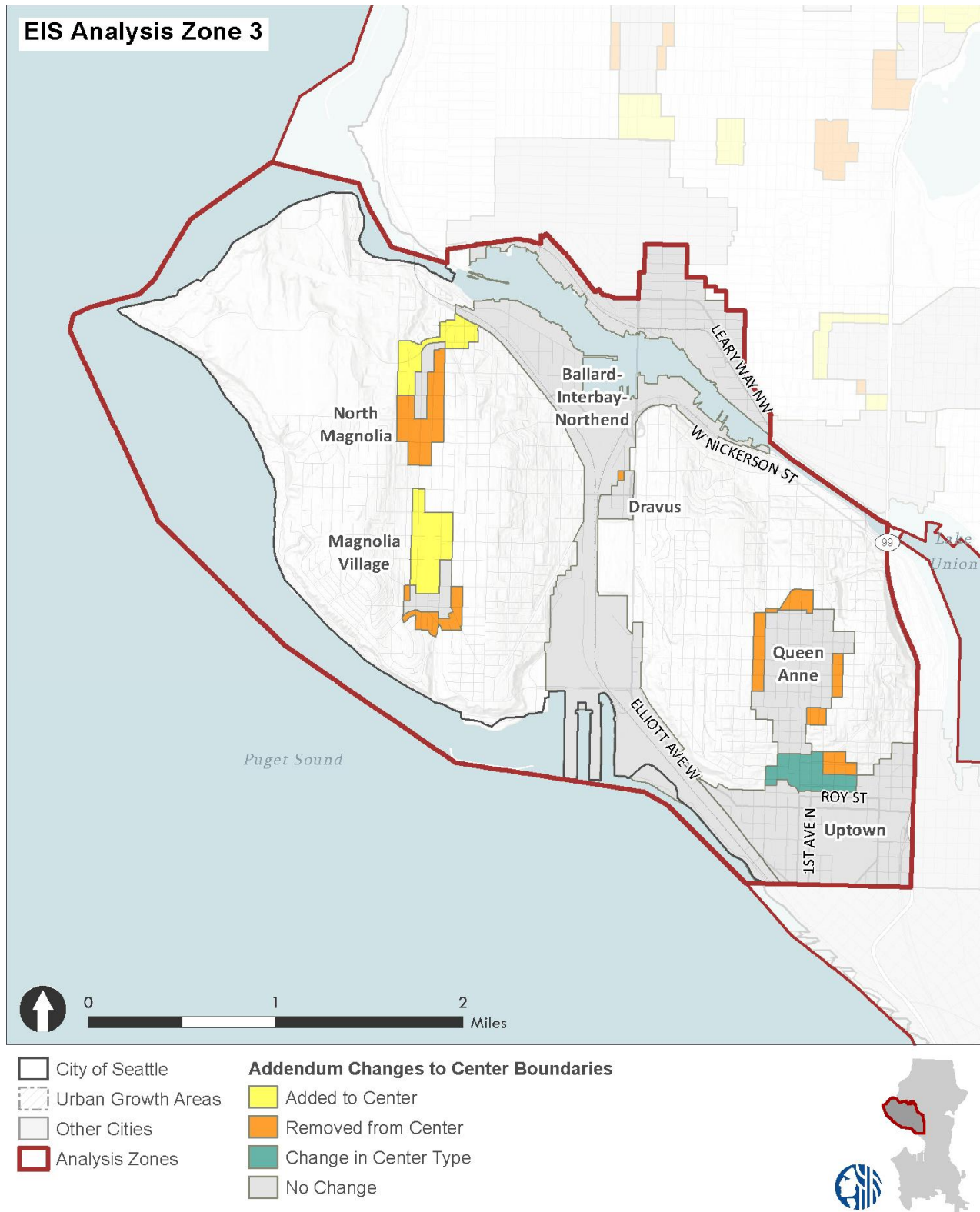
Exhibit 1-3. Revised Proposal Center Boundary Revisions—Area 2



Map Date: October 2025

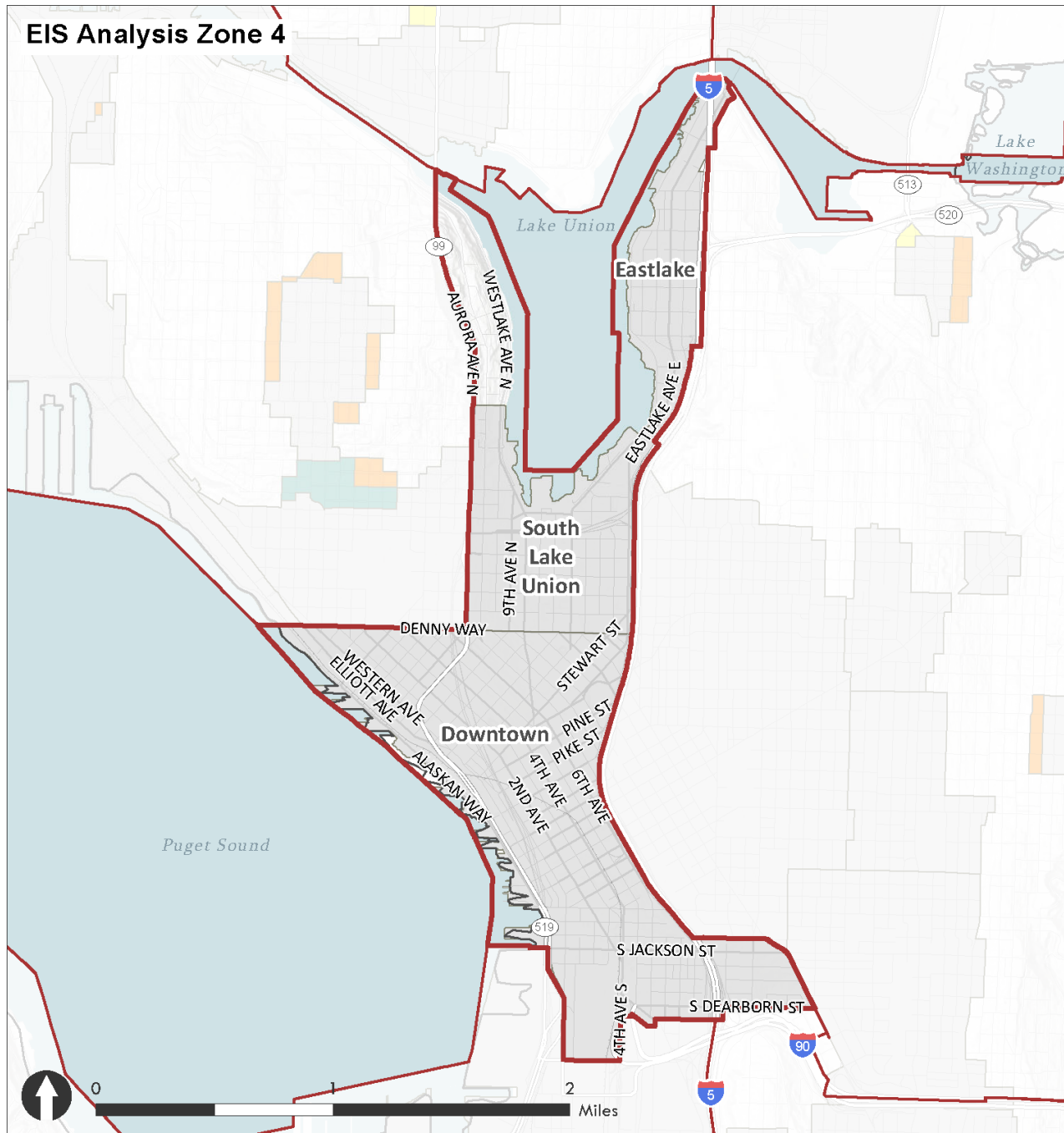
Sources: City of Seattle, 2025; BERK, 2025.

Exhibit 1-4. Revised Proposal Center Boundary Revisions—Area 3



Sources: City of Seattle, 2025; BERK, 2025.

Exhibit 1-5. Revised Proposal Center Boundary Revisions—Area 4



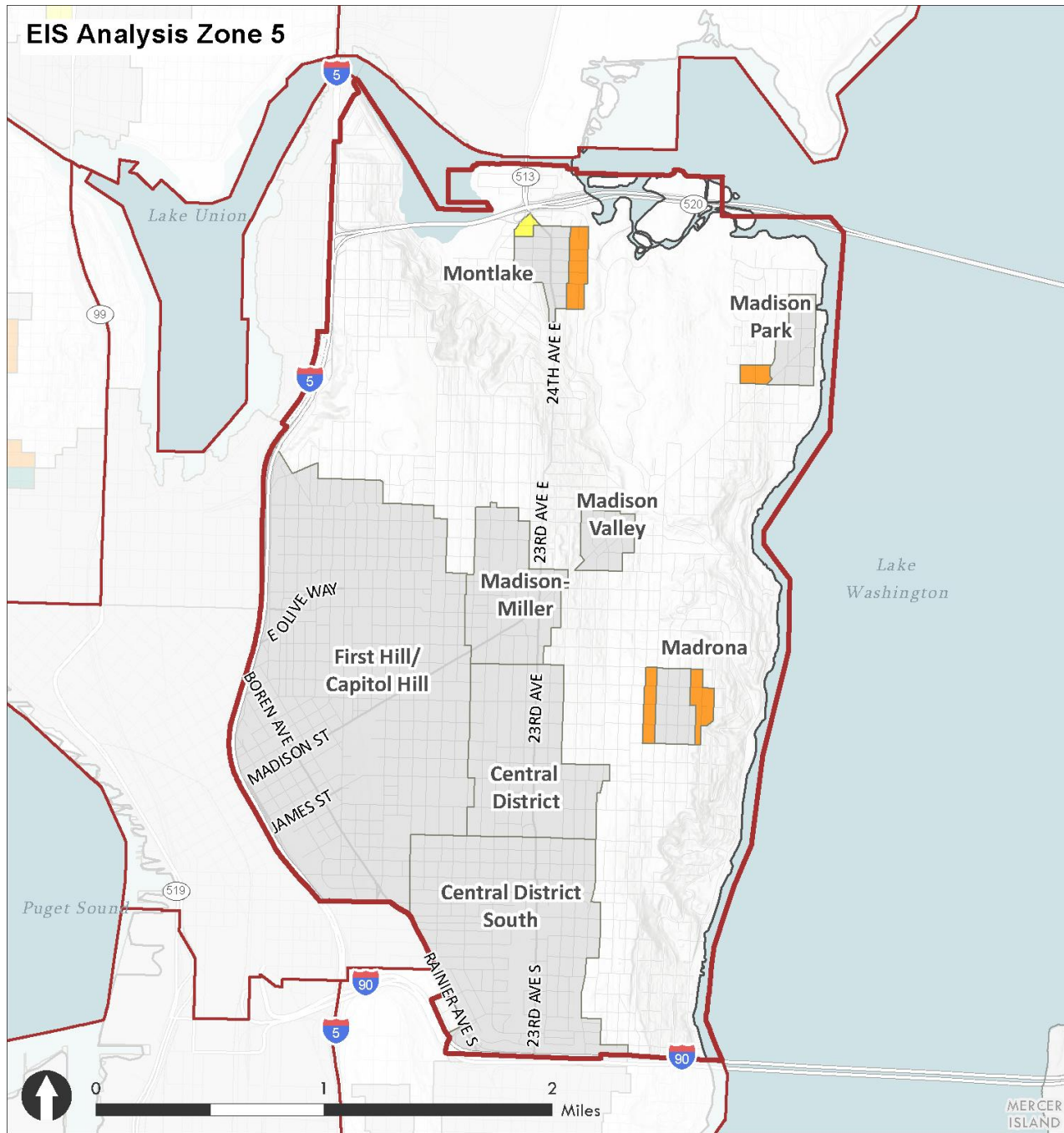
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|--------------------|--|
| City of Seattle | Addendum Changes to Center Boundaries |
| Urban Growth Areas | Added to Center |
| Other Cities | Removed from Center |
| Analysis Zones | Change in Center Type |
| | No Change |



Map Date: October 2025

Sources: City of Seattle, 2025; BERK, 2025.

Exhibit 1-6. Revised Proposal Center Boundary Revisions—Area 5

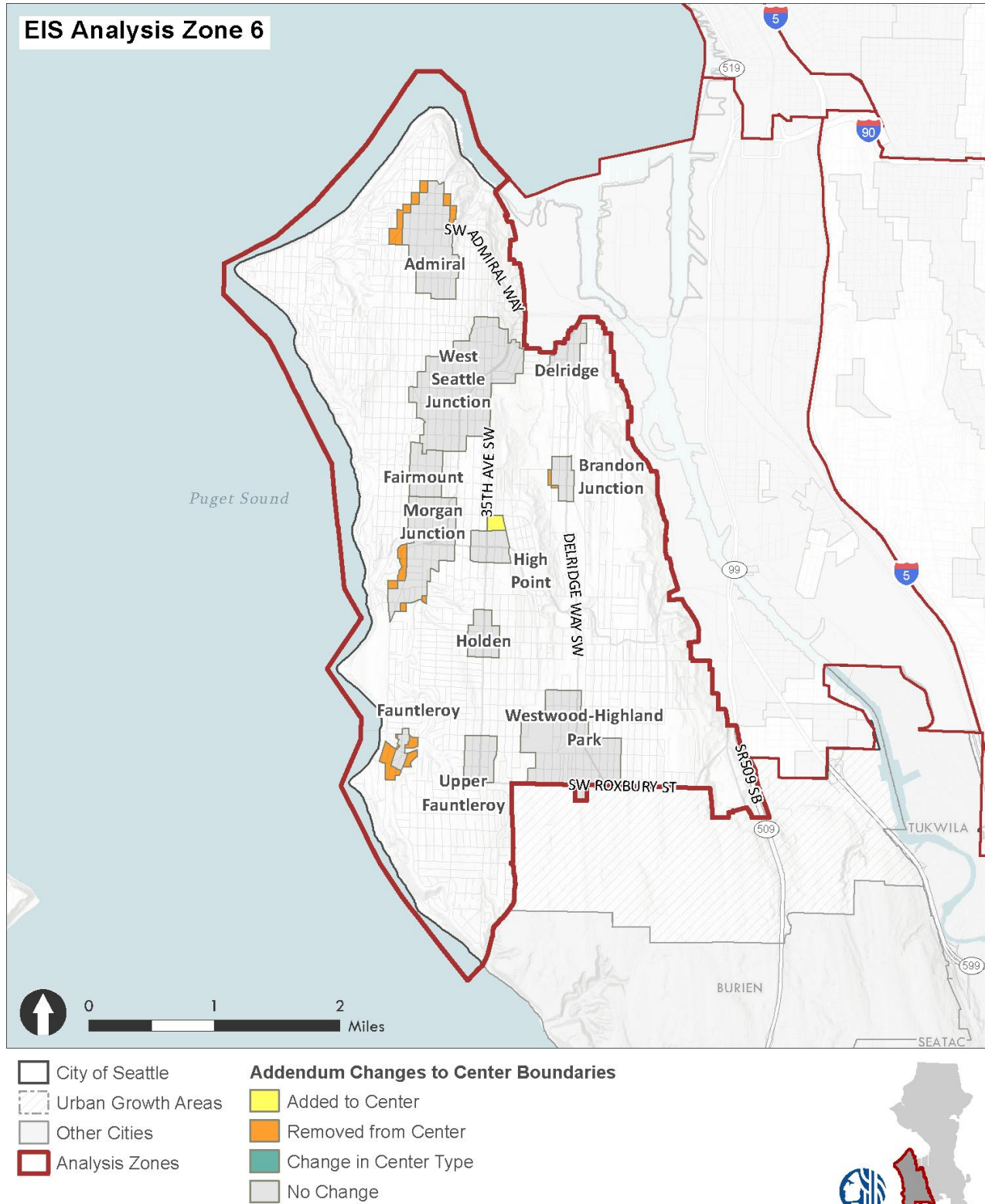


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|--|--------------------|--|-----------------------|
| | City of Seattle | | Added to Center |
| | Urban Growth Areas | | Removed from Center |
| | Other Cities | | Change in Center Type |
| | Analysis Zones | | No Change |



Sources: City of Seattle, 2025; BERK, 2025.

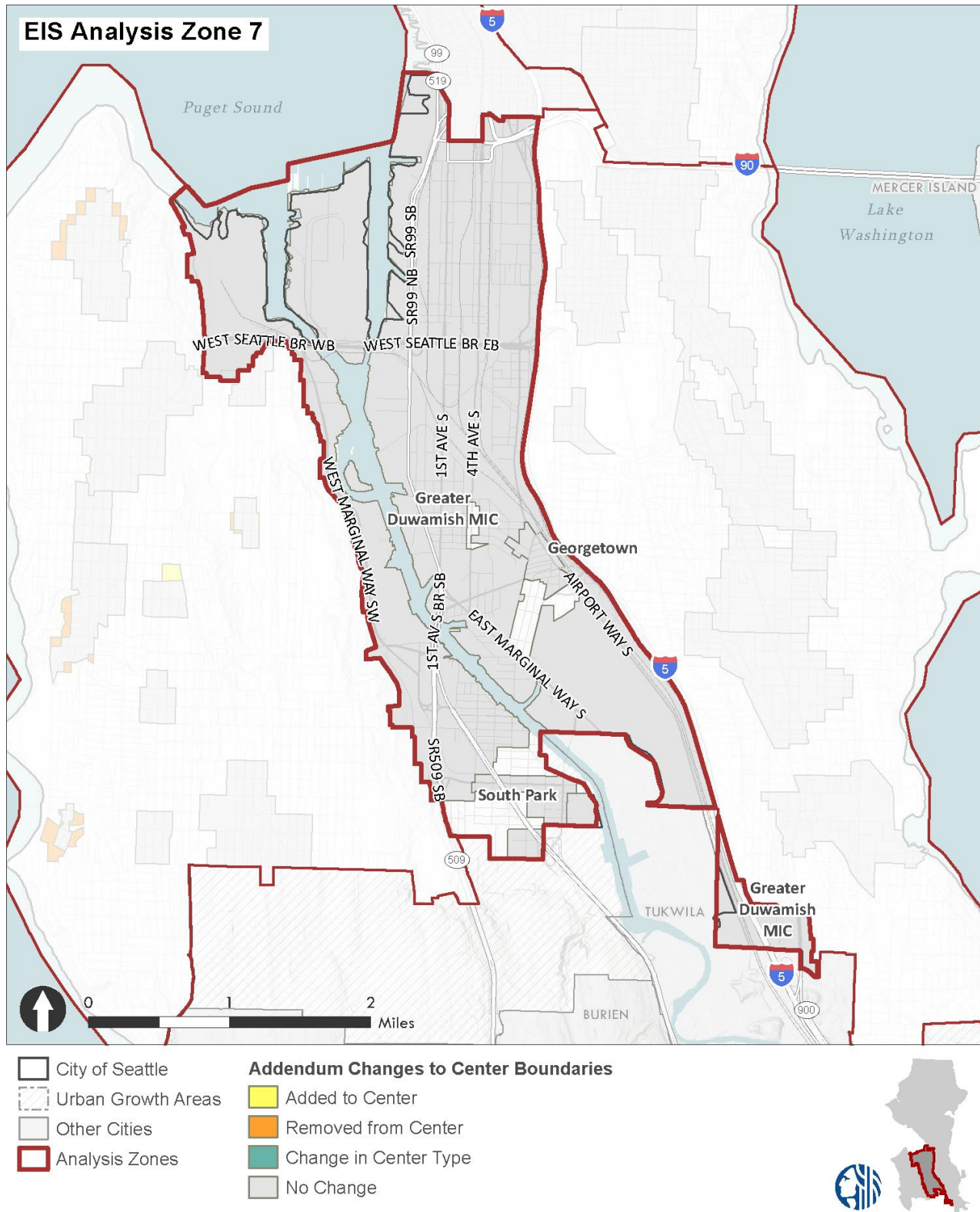
Exhibit 1-7. Revised Proposal Center Boundary Revisions—Area 6



Map Date: October 2025

Sources: City of Seattle, 2025; BERK, 2025.

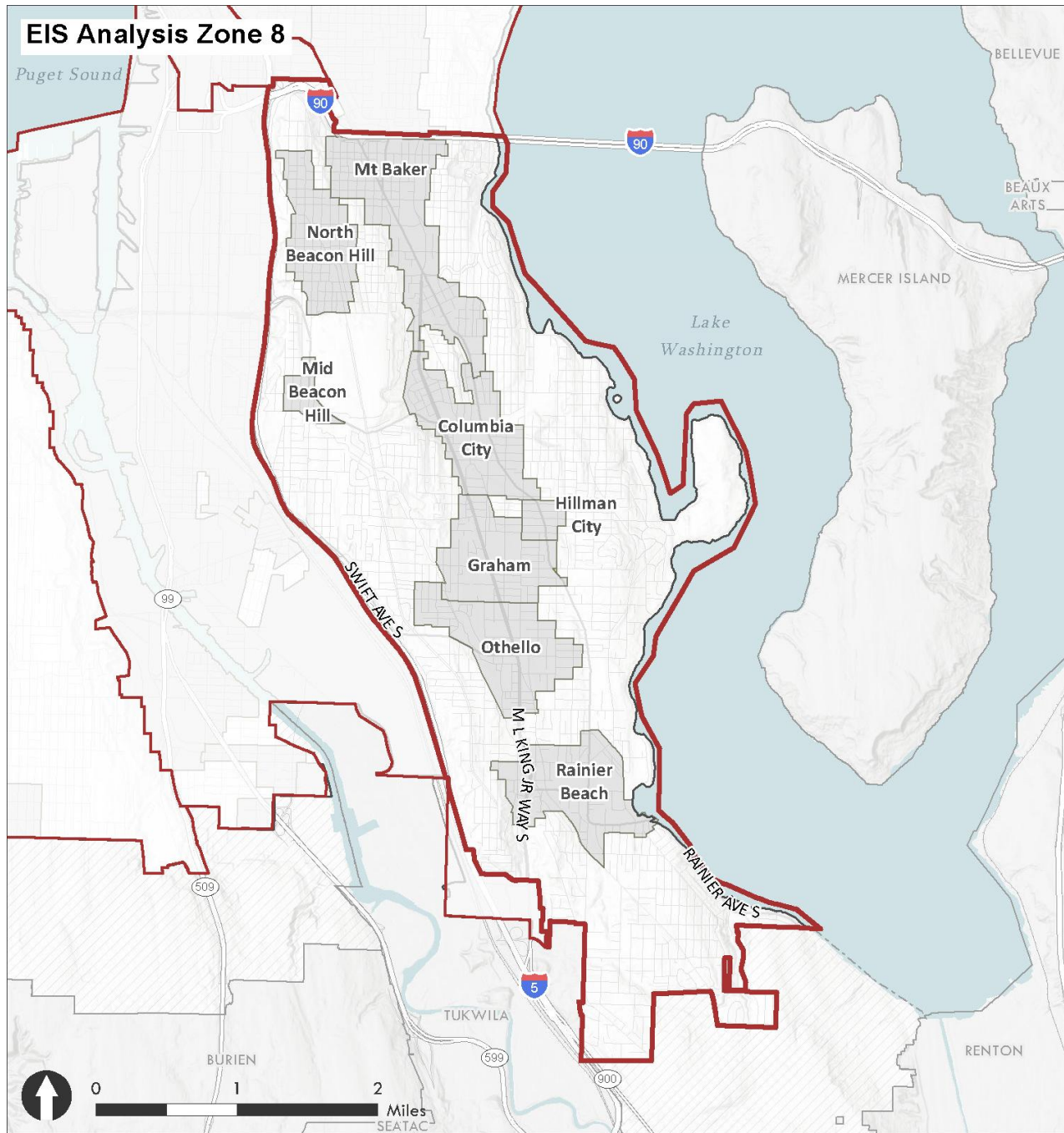
Exhibit 1-8. Revised Proposal Center Boundary Revisions—Area 7



Map Date: October 2025

Sources: City of Seattle, 2025; BERK, 2025.

Exhibit 1-9. Revised Proposal Center Boundary Revisions—Area 8



- | | |
|--------------------|--|
| City of Seattle | Addendum Changes to Center Boundaries |
| Urban Growth Areas | Added to Center |
| Other Cities | Removed from Center |
| Analysis Zones | Change in Center Type |
| | No Change |



Sources: City of Seattle, 2025; BERK, 2025.

1.2.2 Implementing Seattle Municipal Code Changes

The FEIS Preferred Alternative included changes to the Comprehensive Plan and changes to the Seattle Municipal Code to implement the Growth Strategy in the Comprehensive Plan including changes to Neighborhood Residential zones and rezones in centers and corridors. The FEIS also identified an intent to raise SEPA categorial exemption thresholds (e.g., under WAC 197-11-800(1)(c) or SB 5412 at RCW 43.21c.229).

Exhibit 1-10 summarizes the development standards for Neighborhood Residential (NR) zones that were studied in the FEIS Preferred Alternative.

Exhibit 1-10. Neighborhood Residential Zone Standards in FEIS Preferred Alternative

Summary	Description
Maximum density	1 unit per 1,250 square feet of lot area except that, consistent with state law, at least four units are allowed on all lots, regardless of lot size, and six units within a quarter-mile walk of major transit or if two units are affordable
Floor area ratio (FAR)	The amount of floor area allowed is equal to the lot size times the FAR. Proposed FARs are: <ul style="list-style-type: none"> ▪ 0.6 FAR for density below 1/4,000 sq ft (e.g., one unit on a 5,000 sq ft lot) ▪ 0.8 FAR for density between 1/4,000 and 1/2,200 sq ft (e.g., two units on a 5,000 sq ft lot) ▪ 1.0 FAR for density between 1/2,200 and 1/1,600 sq ft (e.g., three units on a 5,000 sq ft lot) ▪ 1.2 FAR for density of at least 1/1,600 sq ft (e.g., four units on a 5,000 sq ft lot)
Lot coverage	50 percent
Height limit	32 feet plus a 5-foot pitched roof bonus
Minimum Amenity area requirement	20 percent of lot area The minimum dimension for amenity area is 8 feet or, if the open space includes a circulation pathway serving multiple buildings, 11 feet Amenity area may be private or shared At least half of the amenity area must be at ground level. Only half of amenity area not at ground level counts toward this requirement.
Minimum setbacks and separations	Front: 10 feet Rear: 10 feet without an alley, 5 feet for ADUs, and zero feet with an alley Side: 5 feet Separation between buildings within property: 6 feet
Accessory dwelling units	Accessory dwelling units (ADUs) would count toward the density and floor area limits shown above and be subject to the same standards as principal dwelling units except for a maximum size limit of 1,000 square feet plus 250 square feet of garage.
Alternative standards for stacked flats	Stacked flats located on lots 6,000 square feet or greater and within 1/4 mile of frequent transit are subject to an FAR of 1.4 and a density of 1 unit per 650 square feet.
Alternative standards for low-income housing	Low-income housing located on lots 6,000 square feet or greater and within 1/4 mile of frequent transit are subject to an FAR of 1.8, a height of 42 feet, a density of 1 unit per 400 square feet and a lot coverage of 60%.

Source: City of Seattle, 2025.

Based on the Council Select Committee Amendments, incentives or standards have been developed that address the intent of the proposed One Seattle Plan and State legislation as well as public input. The effect of the amended regulations on the NR prototype developments studied in the FEIS is included in the [Appendix A Updated Development Prototypes: Neighborhood Residential Zones as Updated by the Revised Proposal](#) and further evaluated under [Section 2.2 Land Use & Urban Form](#).

Incentives or Standards for Housing Variety and Affordability

- Amendment 55, Version 1: Increase ADU size for legacy homeowners in certain zones
- Amendment 57, Version 1: Allowing larger maximum size for ADUs
- Amendment 59, Version 1: Exempt ADUs from Mandatory Housing Affordability
- Amendment 61, Version 2: Expanding affordable housing bonus and extending bonus to social housing
- Amendment 63, Version 2: Expand affordable housing bonus FAR in LR zones
- Amendment 68, Version 1: Waiving development standards for internal conversions
- Amendment 69, Version 1: Minimum floor area for development on small lots
- Amendment 70, Version 2: Increasing FAR for densest development and stacked flats
- Amendment 71, Version 1: Clarifying density allowances
- Amendment 73, Version 1: Parcel Rounding
- Amendment 77, Version 2: Cottage housing incentive
- Amendment 78, Version 1: Family Housing Bonus Near Schools
- Amendment 79, Version 1: Bonus for Accessible Units
- Amendment 80, Version 2: Incentivizing balconies on apartment buildings
- Amendment 90, Version 1: Expanding Stacked Flat Bonus
- Amendment 95, Version 2: Reduce setbacks on small lots near transit
- Amendment 97, Version 2: Require larger setbacks on Queen Anne Blvd
- Amendment 98, Version 1: Reduce required building separations
- Amendment 112, Version 1: Allow increased height for development with larger setbacks
- Amendment 113, Version 1: Adopt State model code requirements for setbacks

Incentives or Standards for Neighborhood Commercial Businesses

- Amendment 65, Version 1: Allowing stores to be located anywhere in neighborhood residential.

Incentives or Standards that Address Environmental Justice

- Amendment 75, Version 1: Require indoor air quality and noise improvements for development near interstates, highways, major truck streets, or railroad rights-of-way.

Incentives or Standards for Parking

- Amendment 85, Version 1: Amend parking requirements to implement State law.

Incentives or Standards to Retain Trees

- Amendment 87, Version 1: Tree Protection Parking Waiver.
- Amendment 91, Version 2: Expanding Stacked Flat Bonus for Trees or Green Factor.
- Amendment 94, Version 1: Tree Retention Bonus.
- Amendment 100, Version 1: Provide at least one tree per 2,500 square feet of lot area.
- Amendment 102, Version 3: Tree Protections: Alternative Site Plan Authority and SDCI procedural discretion for development that encroaches on tree protection areas.
- Amendment 104, Version 1: Provide greater flexibility when trees are protected.

Area 8 Rezone

- Amendment 83, Version 1: Rezone a block in Columbia City to Lowrise 2, rather than Lowrise 1.

Raising SEPA Thresholds

For consideration in 2026, SDCI is proposing amendments to the land use code (Title 23), SEPA review thresholds (Title 25), and grading code (Title 22) to update the permit review process by limiting the frequency of future SEPA reviews for new development.

The One Seattle FEIS identified that Seattle is considering updating thresholds for environment review consistent with SEPA laws and rules under RCW 43.21C.229 and WAC 197-11-800(1)(c). State laws and rules require environmental review; documentation of plans, programs, and codes that act as mitigation measures; opportunities for comment; and consultation. The City documented its initial approach in DEIS and FEIS Appendix C and provided opportunities for comment through the DEIS and provided notice to agencies such as the Washington State Department of Transportation. The City documented the consultation and its approach to the SEPA exemptions more specifically in the Director's Report and Recommendation SEPA Thresholds Update:

<https://www.seattle.gov/documents/departments/sdci/codes/changestocodes/sepathresholdupdate/sepathresholdupdatedirectorsreport.pdf>.

This addendum reviews the proposed approach to SEPA exemptions since it was addressed in the FEIS and state laws on exemptions have evolved.

1.3 Growth & Land Use Assumptions

Under both the FEIS Preferred Alternative and Revised Proposal, assumed growth is expected to be about 120,000 new dwellings and 158,000 jobs for the period 2024-2044. Total growth by place type under the Revised Proposal is also expected to be the same as the FEIS Preferred Alternative. However, housing and job growth under the Revised Proposal was redistributed within each place type based on revised center boundaries, resulting in variations at the citywide scale of less than 1% (0.02%) that reflect minor differences in place type classification and rounding. See [Exhibit 1-11](#) and [Appendix C Place Type Comparison Tables](#).

Exhibit 1-11. Citywide Growth by Place Type—FEIS Preferred Alternative vs. Revised Proposal

Place Type Code	Place Type Name	FEIS Preferred Alternative**		Revised Proposal		Delta	
		HU Target	Jobs Target	HU Target	Jobs Target	HU	Jobs
RC-METRO	Regional Center - Metro	35,000	94,500	35,000	94,500	0	0
RC-URBAN	Regional Center - Urban	8,000	6,500	8,000	6,500	0	0
UC	Urban Center	29,022	15,280	29,022	15,280	0	0
NC	Neighborhood Center	11,787	5,722	11,793	5,730	6	8
MIC	Manufacturing Industrial Center	800	18,800	800	18,800	0	0
UN	Urban Neighborhood	23,589	11,460	23,589	11,460	0	0
FTC	Frequent Transit Corridor	11,794	5,730	11,794	5,730	0	0
Total		119,993	157,992	119,999	158,000	6*	8*

Legend: HU = Housing Unit.

*Minor differences are due to rounding.

**Minor adjustments in numbers are described in [Appendix C Place Type Comparison Tables](#).

Sources: City of Seattle, 2025; BERK, 2025.

There is slightly more housing growth in Area 1 and slightly less in Areas 2 and 5 under the Revised Proposal. Jobs are reduced slightly in Areas 2-8 and redirected to Area 1. See [Exhibit 1-12](#).

Exhibit 1-12. Difference in Housing and Job Growth by Location—Preferred Alternative and Revised Proposal

	1	2	3	4	5	6	7	8	Total
Net Housing Growth of Revised Proposal	26,288	23,275	8,864	19,124	17,420	12,706	1,621	10,699	119,998*
Housing—Difference with Preferred	618	-242	-111	0	-222	-53	10	4	5
Net Job Growth of Revised Proposal	12,671	10,487	10,858	85,981	4,550	6,027	15,892	11,533	158,000
Jobs—Difference with Preferred	585	-104	-51	-2	-11	-116	-119	-174	8

*This total net housing is effectively 120,000, and the difference is due to rounding errors.

Sources: City of Seattle, 2025; BERK, 2025.

Differences in growth assumptions by center are in [Exhibit 1-13](#). These reflect the East Ballard Neighborhood Center under the Revised Proposal that was not identified under the FEIS Preferred Alternative as well as removal of the Phinney Ridge Neighborhood Center that was in the FEIS Preferred Alternative. See descriptions of the Land Use Plan and Zoning changes above.

Exhibit 1-13. Comparison of Centers under FEIS Preferred Alternative and Revised Proposal

FEIS Growth Area	Addendum Growth Area	FEIS Preferred Alternative		Revised Proposal		Delta	
		HU Target	Jobs Target	HU Target	Jobs Target	HU Target	Jobs Target
Regional Center							
Downtown	Downtown	13,500	60,000	13,500	60,000	0	0
First Hill/Capitol Hill	First Hill/Capitol Hill	9,500	3,000	9,500	3,000	0	0
South Lake Union	South Lake Union	4,500	25,500	4,500	25,500	0	0
University District	University District	4,000	3,500	4,000	3,500	0	0
Uptown	Uptown	3,500	2,500	3,500	2,500	0	0
Ballard	Ballard	6,000	4,000	6,000	4,000	0	0
Northgate	Northgate	2,000	2,500	2,000	2,500	0	0
MIC							
Ballard-Interbay-Northend	Ballard-Interbay-Northend	300	6,100	300	6,100	0	0
Greater Duwamish	Greater Duwamish	500	12,700	500	12,700	0	0
Urban Center							
Admiral	Admiral	915	250	915	250	0	0
Aurora-Licton Springs	Aurora-Licton Springs	950	415	950	415	0	0
Bitter Lake	Bitter Lake	1,010	2,065	1,010	2,065	0	0
Central District	Central District	1,370	132	1,370	132	0	0
Columbia City	Columbia City	1,485	1,050	1,485	1,050	0	0
Crown Hill	Crown Hill	645	330	645	330	0	0
Eastlake	Eastlake	1,010	280	1,010	280	0	0
Fremont	Fremont	1,535	310	1,535	310	0	0
Graham	Graham	1,478	229	1,478	229	0	0
Green Lake	Green Lake	810	170	810	170	0	0
Greenwood	Greenwood	1,000	585	1,000	585	0	0
Judkins Park	Central District South	1,400	548	1,400	548	0	0

FEIS Growth Area	Addendum Growth Area	FEIS Preferred Alternative		Revised Proposal		Delta	
		HU Target	Jobs Target	HU Target	Jobs Target	HU Target	Jobs Target
Lake City	Lake City	925	620	925	620	0	0
Madison-Miller	Madison-Miller	1,215	380	1,215	380	0	0
Morgan Junction	Morgan Junction	830	170	830	170	0	0
Mt Baker	Mt Baker	1,240	3,050	1,240	3,050	0	0
North Beacon Hill	North Beacon Hill	480	700	480	700	0	0
Othello	Othello	539	111	539	111	0	0
Pinehurst-Haller Lake	Pinehurst-Haller Lake	1,500	360	1,500	360	0	0
Rainier Beach	Rainier Beach	1,375	280	1,375	280	0	0
Roosevelt	Roosevelt	1,465	365	1,465	365	0	0
Upper Queen Anne	Queen Anne	900	280	900	280	0	0
Wallingford	Wallingford	915	525	915	525	0	0
West Seattle Junction	West Seattle Junction	3,630	1,600	3,630	1,600	0	0
Westwood-Highland Park	Westwood-Highland Park	400	475	400	475	0	0
Neighborhood Center							
Brandon Junction	Brandon Junction	248	228	249	217	1	-11
Bryant	Bryant	371	70	246	67	-125	-3
Delridge	Delridge	169	583	173	564	4	-19
Dravus	Dravus	203	239	206	227	3	-12
—	East Ballard	0	0	301	155	301	155
Endolyne	Fauntleroy	165	31	54	29	-111	-2
Fairmount	Fairmount	564	189	573	180	9	-9
Georgetown	Georgetown	313	753	318	716	5	-37
High Point	High Point	209	127	213	121	4	-6
Hillman City	Hillman City	345	47	355	50	10	3
Holden	Holden	382	74	388	70	6	-4

FEIS Growth Area	Addendum Growth Area	FEIS Preferred Alternative		Revised Proposal		Delta	
		HU Target	Jobs Target	HU Target	Jobs Target	HU Target	Jobs Target
Holman Road	Holman Road	452	248	468	250	16	2
Little Brook	Little Brook	346	213	352	208	6	-5
Madison Park	Madison Park	151	31	154	33	3	2
Madison Valley	Madison Valley	245	33	247	32	2	-1
Madrona	Madrona	370	48	222	46	-148	-2
Magnolia Village	Magnolia Village	378	97	595	92	217	-5
Maple Leaf	Maple Leaf	417	67	424	64	7	-3
Mid Beacon Hill	Mid Beacon Hill	432	56	439	53	7	-3
Montlake	Montlake	479	48	381	45	-98	-3
North Magnolia	North Magnolia	681	78	312	68	-369	-10
Olympic Hills	Olympic Hills	652	298	659	277	7	-21
Phinney Ridge	—	203	52	0	0	-203	-52
Ravenna	Ravenna	321	55	250	45	-71	-10
South Park	South Park	396	1,083	403	1,032	7	-51
Tangletown	Tangletown	572	31	581	35	9	4
Upper Fautleroy	Upper Fautleroy	317	93	322	88	5	-5
Upper Fremont	Upper Fremont	512	168	658	226	146	58
Wedgwood	Wedgwood	445	130	437	128	-8	-2
West Green Lake	Northwest Green Lake	648	123	902	186	254	63
Whittier	Whittier	571	213	911	426	340	213
Frequent Transit Corridor	Frequent Transit Corridor	12,007	5,940	11,794	5,730	-212	-210
Urban Neighborhood	Urban Neighborhood	23,607	11,466	23,589	11,460	-18	-6
	Total	119,993	157,992	119,999	158,000	6	8

Sources: City of Seattle, 2025; BERK, 2025.

2 ANALYSIS

2.1 Plants & Animals

This section evaluates the potential impacts of the Revised Proposal on plants and animals, as compared to the range of impacts that were evaluated in the FEIS. Discussions emphasize comparisons to the FEIS Preferred Alternative because the impacts of the Revised Proposal would be substantively similar to those of the FEIS Preferred Alternative.

2.1.1 Background

Context

Analyses in the FEIS focused primarily on potential impacts on tree canopy cover. Analyses also addressed concerns relating to populations of native species in and near Seattle, as well as the impacts of stormwater contaminants on fish (see Thresholds of Significance, below).

Evaluations of the potential impacts of the alternatives on plants and animals were based on the following considerations:

- Existing and proposed regulations, policies, and practices that encourage the retention and expansion of tree canopy and the minimization of contaminants delivered to surface waters.
- The amount of land in place types dedicated to relatively high-density residential uses.
- The estimated acreage of land potentially affected by residential development projects during the 20-year planning period.
- The acreage of land and number of anticipated housing units that would be in low-density, Neighborhood Residential-zoned areas under FEIS Alternative 1 (No Action) but that would be zoned for higher-density uses under the FEIS Preferred Alternative.
- The estimated amount of area affected by residential projects in areas where extensive multifamily development is already present.

The following subsections compare the potential impacts of the Revised Proposal to those of the FEIS Preferred Alternative, using the analysis approach from the FEIS.

Thresholds of Significance

The FEIS identified the following thresholds of significance for evaluating the impacts of the Revised Proposal:

- Impacts that would reduce the likelihood that populations of native plant or animal species would persist in or near Seattle, compared to the No Action Alternative.
- A substantially increased potential for tree canopy cover loss, compared to the No Action Alternative.
- An appreciable increase in the delivery of stormwater contaminants to fish-bearing streams, compared to the No Action Alternative.

The potential impacts of the Revised Proposal are also evaluated in terms of these thresholds of significance.

2.1.2 Analysis

Viewed through the lens of potential impacts on plants and animals, the Revised Proposal amount to a minor modification in impacts as compared to the FEIS Preferred Alternative. The policy amendments would expand incentives for the retention of existing trees, as indicated by these examples:

- **Amendment 87** would waive parking requirements for any residential development that retains a Tier 2 tree.
- **Amendment 91** would allow higher FAR values for stacked-flat projects in NR zones that include green infrastructure. Projects that (1) retain a Tier 1 tree, (2) retain two Tier 2 trees, or (3) achieve a Green Factor score of 0.6 or more would also be permitted higher densities (1 unit per 500 square feet of lot area) and higher building heights (up to 42 feet).
- **Amendment 94** would increase structure height limits, waive amenity areas standards, and waive parking requirements for projects that retain Tier 2 trees or that provide and/or retain medium to large trees that achieve at least a 10 percent tree canopy coverage for the project site at tree maturity.
- **Amendment 100** would require at least one tree to be planted for every 2,500 square feet of lot area undergoing development in NR zones, regardless of project density (dwelling units per lot size), if tree planting would result in more trees than would be achieved through tree retention. (In some circumstances, this could result in tree planting being favored over tree retention.)
- **Amendment 102** would modify tree protection area requirements, reducing the number of situations in which tree removal would be necessary.
- **Amendment 104** would allow greater flexibility in site planning (including reductions of required amenity areas) when existing trees are protected.

In addition, an October 2025 Executive Order directs City departments to develop and implement policy and regulatory changes to encourage the preservation of exceptional trees on private property.

The land use plan amendments would adjust the boundaries of some neighborhood, urban, and regional centers, as well as adjusting assumptions relating to housing and job growth in some areas. These changes would result in small changes in the values that supported the quantitative evaluation of the FEIS Preferred Alternative in the FEIS. These differences are summarized below.

As discussed in the FEIS, where parcels that currently have lower-density residential designations are converted to higher-density designations, reductions in tree canopy cover may result. The amount of land in place types dedicated to relatively high-density residential uses would be about 33,600 acres greater under the Revised Proposal than under FEIS Alternative 1 (the No Action Alternative)—an increase essentially identical to that under the FEIS Preferred Alternative. These areas would be distributed throughout the city, including areas with relatively high proportions of existing tree canopy cover. This place-type-based analysis indicates that potential for the Revised Proposal to result in development-related impacts to vegetation would be similar to that of the FEIS Preferred Alternative.

Exhibit 2-4 summarizes the estimated acreage of land potentially affected by residential development projects during the 20-year planning period. The total area affected under the Revised Proposal (and, as such, the potential for development-related impacts to trees and vegetation citywide) would be approximately 35 acres (1%) lower than under the FEIS Preferred Alternative.

Exhibit 2-1. Estimated Area (Acres) That May Be Affected by Residential Development

Place Type	Preferred Alternative	Revised Proposal
Center (Existing or New) ¹	1,252	1,251
Outside Subareas (Continued Development) ²	97	99
Urban Neighborhood ³	1,249	1,213
Corridor ⁴	159	158
Urban Neighborhood—Other Multifamily	13	14
Total	2,770	2,735

Notes:

1 Includes areas classified as Regional Centers, Urban Centers, and Neighborhood Centers.

2 Consists of areas classified as "Outside Subareas" common to all alternatives in the FEIS. No change to place type is proposed in these areas, but growth would continue to occur throughout the 20-year planning period.

3 Consists of areas classified as Urban Neighborhood – Neighborhood Residential.

4 Consists of areas classified as Urban Neighborhood – Frequent Transit Corridor.

Source: BERK, 2025.



As with the FEIS Preferred Alternative, zoning-level information is available for the Revised Proposal, allowing a comparison of how Neighborhood Residential Zones would change from FEIS Alternative 1 No Action to the Revised Proposal ([Exhibit 2-2](#) and [Exhibit 2-3](#)).

Exhibit 2-2. Site Zone Acreage by Revised Proposal Place Type—Neighborhood Residential-Zoned Areas Proposed for Higher-Density Uses than FEIS Alternative 1 (No Action)

Existing Zone	Proposed Place Type	Regional Center—Metro	Regional Center—Urban	Urban Center	Neighborhood Center	Corridor	Urban Neighborhood
NR1	Outside Subareas	0	0	0	0	3	571
NR2	Outside Subareas	0	1	123	30	234	4,126
NR2	Hub Urban Village	0	0	0	0	0	0
NR3	Outside Subareas	14	0	360	496	499	9,297
NR3	Residential Urban Village	0	0	41	0	0	0
NR3	Hub Urban Village	0	0	1	0	0	0
Total (Rezoned Parcels Only)		14	1	525	526	736	13,994
Percent of total		0.1%	0.0%	3%	3%	5%	89%

Source: BERK, 2025.

Exhibit 2-3. Revised Proposal Housing Growth by Place Type—Neighborhood Residential-Zoned Areas Proposed for Higher-Density Uses than FEIS Alternative 1 (No Action)

Existing Zone	Proposed Place Type	Regional Center—Metro	Regional Center—Urban	Urban Center	Neighborhood Center	Corridor	Urban Neighborhood
NR1	Outside Subareas	0	0	0	0	49	579
NR2	Outside Subareas	0	0	1,381	448	2,756	5,106
NR2	Hub Urban Village	0	0	0	0	0	0
NR3	Outside Subareas	429	0	3,264	6,497	5,659	15,260
NR3	Residential Urban Village	0	0	30	0	0	0
NR3	Hub Urban Village	0	0	1	0	0	0
Total (Rezoned Parcels Only)		429	0	4,675	6,945	8,464	20,946
Percent of total		1%	0%	11%	17%	20%	51%

Source: BERK, 2025.

The analysis in the FEIS identified approximately 1,900 acres of land that are currently in lower-density Neighborhood Residential-zoned areas and that would be zoned for higher-density uses under the FEIS Preferred Alternative. The corresponding value for the Revised Proposal is 1,802 acres ([Exhibit 2-2](#)). While Urban Neighborhood-zoned parcels would make up 89% of the lands



previously zoned for low-density uses, only about 51% of the housing units anticipated under the Revised Proposal would be located in these areas. These values differ from those for the FEIS Preferred Alternative (88% and 50%, respectively) by one percentage point.

Compared to the FEIS Preferred Alternative, the Revised Proposal would direct approximately the same amount of housing growth to areas currently dominated by low-density residential development. As a result, the Revised Proposal' potential for vegetation impacts would be roughly equivalent to that of the FEIS Preferred Alternative.

Under the Revised Proposal, the estimated amount of area affected by residential projects in areas where extensive multifamily development is already present would be substantively identical to the area anticipated under the FEIS Preferred Alternative. For this reason, the Revised Proposal' potential for contributing to adverse effects on disadvantaged populations or exacerbating climate vulnerability would be similar to that of the FEIS Preferred Alternative.

Based on the amount of area where development or redevelopment may result in losses of vegetated areas, the potential for localized short-term and long-term decreases in the diversity and/or abundance of plant and animal communities under the alternatives would be similar to that of the Preferred Alternative.

Based on the anticipated amount of area available for conversion to higher density uses, the Revised Proposal' potential for contributing to increased delivery of stormwater contaminants to streams would be similar to that of the FEIS Preferred Alternative.

130th/145th Station Area

Under the Revised Proposal, the number of new housing units in the Pinehurst-Haller Lake Urban Center would be identical to that anticipated under the FEIS Preferred Alternative. The number of new housing units in the Olympic Hills Neighborhood Center would be slightly greater than that anticipated under the FEIS Preferred Alternative (659 vs. 652). For these reasons, the effects of amendments on plants and animals in the 130th/145th Station Area would be similar to those of the FEIS Preferred Alternative.

2.1.3 Summary Comparison to FEIS Results

Based on the analysis above, the Revised Proposal would be expected to have very similar impacts on plants and animals, as compared to the FEIS Preferred Alternative. All impacts of the Revised Proposal fall within the range of outcomes evaluated in the FEIS. For these reasons, the Revised Proposal would not result in significant, unavoidable adverse impacts (as defined by the thresholds of significance) on plants and animals.

2.2 Land Use & Urban Form

2.2.1 Background

Context

This section evaluates land use impacts of the Revised Proposal as compared to the FEIS Preferred Alternative. It includes many of the same types of impact analysis presented in the FEIS. For a more detailed discussion of evaluation methods, see the FEIS.

Thresholds of Significance

This analysis focuses on the potential impacts of changes in land use patterns, permitted uses, or development intensities under the Revised Proposal as compared to the FEIS Preferred Alternative. Impacts are discussed based on the following categories:

- **Land use patterns** consider the distribution of growth and intensity of planned uses as well as resulting activity levels.
- **Land use compatibility** considers changes in use type between adjacent areas and any likely incompatibilities. Land use incompatibilities could be related to health and safety (such as noise levels or odors), activity levels at various times of day/night, or conflicting movement patterns.
- **Height, bulk, and scale** considers the physical form, aesthetic, and character of development (such as massing, setbacks, height, and FAR).
- **Transitions** consider visual changes in physical form between adjacent areas.
- **Tree canopy** considers how urban form affects tree canopy.
- **Shadows** consider shading of public open space or rights-of-way as a result of allowed development and the possible implications related to health, urban heat, and the human experience.
- **Views** consider the protection of public views of important landmarks and natural features, as well as views from specific designated viewpoints within the city and scenic qualities along mapped scenic routes.

2.2.2 Analysis

Land Use Patterns & Compatibility

Like the FEIS Preferred Alternative, growth under the Revised Proposal would increase activity levels and land use intensities across the city resulting in likely adverse impacts to land use

patterns and compatibility impacts. The Revised Proposal anticipates an increase in supply and diversity of housing across Seattle similar to the FEIS Preferred Alternative. Amendments include the strategies for encouraging housing growth in the FEIS Preferred Alternative plus some additional changes to support a wide range of housing types that are affordable and reduce displacement. The Revised Proposal also includes center boundary revisions and changes to place type designations beyond the FEIS Preferred Alternative. [Exhibit 1-2](#) through [Exhibit 1-9](#) map proposed changes to the center boundaries by analysis area, including changes made to the center boundaries after the FEIS and further revisions via Council Select Committee Amendments, as compared to the FEIS Preferred Alternative boundaries (see also [Appendix B](#) for maps of individual center boundary revisions). Changes to Regional and Urban Centers include:

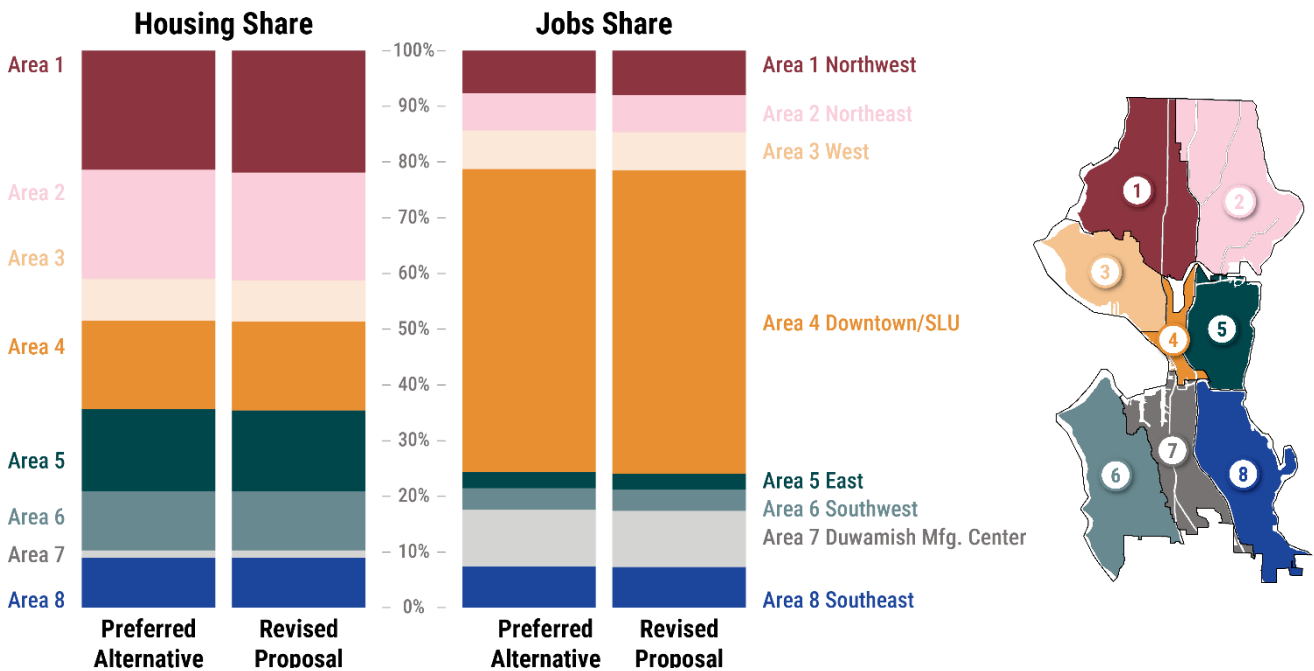
- Area 1: Remove areas from the Greenwood Urban Center in the northeast, southeast, and southwest (pre-Council Amendments).
- Area 2: Remove area near Northacres Park from the Pinehurst-Haller Lake Urban Center (pre-Council Amendments).
- Area 3: Add areas north from Roy Street to Prospect Street to the Queen Anne Urban Center instead of the Uptown Regional Center and revise the boundaries of the Queen Anne Urban Center (pre-Council Amendments and Amendment 51). Amendment 51 also renames the Upper Queen Anne Urban Center to Queen Anne.
- Area 6: Amend the boundary of the Morgan Junction Urban Center (pre-Council Amendments and Amendment 37). These changes remove small areas in the west and southeast from the center. Remove areas from the Admiral Urban Center in the northwest and northeast (pre-Council Amendments).

The Revised Proposal also includes 30 new neighborhood centers similar to the FEIS Preferred Alternative. Revisions since the FEIS Preferred Alternative to neighborhood center boundaries include:

- Area 1: Add an East Ballard Neighborhood Center and remove the Phinney-Ridge Neighborhood Center (Amendment 42). Amend the boundary of the Upper Fremont Neighborhood Center (Amendment 48), West Green Lake Neighborhood Center (pre-Council Amendments and Amendment 49), and Whittier Neighborhood Center (pre-Council Amendments).
- Area 2: Amend the boundary of the Bryant Neighborhood Center (pre-Council Amendments) and Ravenna Neighborhood Center (Amendment 40).
- Area 3: Amend the boundary of the Magnolia Village Neighborhood Center (pre-Council Amendments and Amendment 44) and North Magnolia Neighborhood Center (pre-Council Amendments and Amendment 45).
- Area 5: Amend the boundary of the Madison Park Neighborhood Center (pre-Council Amendments), Madrona Neighborhood Center (pre-Council Amendments and Amendment 38), and Montlake Neighborhood Center (pre-Council Amendments).
- Area 6: Amend the boundary of the Fauntleroy Neighborhood Center (Amendment 35, also renamed to Fauntleroy from Endolyne) and High Point Neighborhood Center (Amendment 36).

The FEIS Preferred Alternative and Revised Proposal both assume citywide growth of about 120,000 new dwellings and 158,000 jobs for the period 2024-2044. Most new growth under the Revised Proposal would still be focused within the centers currently characterized by higher densities, more compact building forms, and a more diverse mix of uses than other areas of the city. Variations between the two at the citywide scale are less than 1% (0.02%) and reflect minor place type classification differences and rounding. See [Exhibit 1-11](#); differences in center growth assumptions are shown in [Exhibit 1-13](#). As a result, growth under both the FEIS Preferred Alternative and Revised Proposal is likely to result in a denser land use pattern citywide with focused growth in the centers and smaller mixed-use nodes in the new neighborhood centers and near corridors with frequent transit. However, under the Revised Proposal, slightly more housing and job growth would be directed into Area 1, with slightly less housing growth in Areas 2 and 5 and slightly less job growth in Areas 2 through 8. See [Exhibit 1-12](#) and [Exhibit 2-4](#).

Exhibit 2-4. Comparison of Housing and Job Growth Estimates Percent Share by Study Area—FEIS Preferred Alternative vs. Revised Proposal



Sources: City of Seattle, 2025; BERK, 2025.

Under the Revised Proposal, the redesignated Ballard Regional Center would meet PSRC’s Metro Regional Growth Center (RGC) size and activity unit density criteria. Under the FEIS Preferred Alternative, future activity unit density in the Ballard Regional Center was just below the Metro threshold but above the Urban RGC threshold. Like the FEIS Preferred Alternative, Northgate would meet PSRC’s future activity unit threshold for Urban RGCs which could result in redesignation from Metro to Urban RGC in the future, and urban centers would meet King County’s minimum future density criteria for Countywide Centers. Green Lake, Lake City, and Madison-Miller would still be below the size threshold. See [Exhibit 2-5](#).

PSRC RGCs require a minimum density of 30 existing activity units and 85 planned activity units for Metro RGCs, 18 existing activity units and 45 planned activity units for Urban RGCs and are expected to be between 320–640 acres in size (or larger if served by an internal, high-capacity transit system). Appendix 6 of the King County CPPs includes higher activity unit thresholds for Metro and Urban RGCs (60 existing/120 planned for Metro RGCs and 30 existing/60 planned for Urban RGCs). Per the CPPs, not meeting existing activity unit thresholds for existing centers (all of Seattle’s Regional Centers except for Ballard under the Preferred Alternative) is not grounds for de-designation or re-designation by the Growth Management Planning Council.

King County countywide centers require an existing density of at least 18 activity units and planned density of at least 30 activity units and are expected to be between 160–500 acres in size.

Exhibit 2-5. Future Activity Units (AU)—FEIS Preferred Alternative vs. Revised Proposal

	FEIS Preferred Alt. (as published) ¹				Revised Proposal ¹			
	Existing AU/Ac.	Acres	2044 AU	2044 AU/Ac.	Existing AU/Ac.	Acres	2044 AU	2044 AU/Ac.
Regional Centers								
Downtown	253.3	952	318,003	334.0	253.3	952	323,549	339.8
First Hill/Capitol Hill	111.5	1,015	131,529	129.6	111.4	1,017	135,873	133.6
South Lake Union	275.7	340	125,946	370.6	275.7	340	126,640	372.6
University Community	99.5	753	83,950	111.4	99.5	753	88,213	117.1
Uptown ²	81.1	389	39,574	101.9	94.5	333	40,349	121.0
Ballard	57.9	495	41,457	83.7	58.0	495	42,350	85.5
Northgate	46.6	412	25,073	60.8	46.7	412	25,595	62.1
Urban Centers								
Admiral ²	29.9	219	8,287	37.8	35.0	187	8,572	45.7
Aurora-Licton Springs	33.1	327	13,155	40.2	33.1	327	13,530	41.4
Bitter Lake Village	30.3	364	14,975	41.2	30.4	362	15,215	42.0
Central District	31.6	232	10,345	44.6	31.6	232	10,552	45.5
Columbia City	36.7	335	16,692	49.9	36.7	335	17,055	51.0
Crown Hill	26.6	271	9,004	33.2	26.6	271	9,266	34.2
Eastlake	65.5	199	14,930	74.9	65.5	199	15,421	77.4
Fremont	68.3	214	17,331	80.8	68.3	215	17,779	82.9
Graham ²	18.3	291	9,328	32.0	17.8	300	9,589	32.0
Green Lake	59.7	109	7,683	70.7	59.7	109	7,896	72.6
Greenwood ²	42.3	197	10,900	55.3	48.4	172	11,274	65.5
Judkins Park (Central District South) ³	39.3	467	21,743	46.5	39.3	467	22,241	47.6
Lake City	49.2	142	9,453	66.5	49.2	142	9,706	68.2
Madison-Miller	55.5	145	10,339	71.2	55.5	145	10,559	72.7
Morgan Junction ²	26.8	198	6,940	35.1	29.4	180	7,146	39.6
Mt Baker	28.7	491	19,679	40.1	28.7	491	20,051	40.8
North Beacon Hill	31.8	267	9,963	37.3	31.8	267	10,212	38.3

	FEIS Preferred Alt. (as published) ¹				Revised Proposal ¹			
	Existing AU/Ac.	Acres	2044 AU	2044 AU/Ac.	Existing AU/Ac.	Acres	2044 AU	2044 AU/Ac.
Othello	33.4	353	12,632	35.8	33.4	353	13,041	36.9
Pinehurst–Haller Lake ^{2,3}	17.3	217	7,210	33.2	18.3	205	7,369	35.9
Rainier Beach	19.9	346	10,553	30.5	19.9	346	10,898	31.5
Roosevelt	55.5	170	12,391	72.8	55.5	170	12,627	74.2
Upper Queen Anne (Queen Anne) ^{2,3}	39.0	208	9,763	46.9	39.0	208	10,084	48.5
Wallingford	40.6	258	12,349	47.9	40.6	258	12,736	49.4
West Seattle Junction	47.9	367	24,822	67.6	47.9	367	25,399	69.2
Westwood-Highland Park	25.8	275	8,302	30.2	25.7	276	8,522	30.9

1 Existing activity units per acre by center are based on OFM’s 2023 SAEP April 1 census block estimate of total population and PSRC’s 2023 (Preferred Alternative) and 2024 (Revised Proposal) estimate of all jobs (estimated by starting with ESD Q1 Covered Employment and estimating the remaining jobs not covered by unemployment insurance) within the center boundaries. Future 2044 population by center was calculated using OFM’s 2023 housing unit estimate, additional housing unit permits issued between April 1, 2023 and June 1, 2024 (since the 2023 OFM estimate), a citywide household occupancy rate of 93%, estimated existing people per household by center (per OFM’s 2023 household and population estimates), and housing unit growth targets. Future 2044 jobs by center were calculated using PSRC’s 2023 (Preferred Alternative) or 2024 (Revised Proposal) covered employment estimate and job growth targets. Future 2044 activity units per acre for each center are based on the combined estimated 2044 population and jobs and acres within each center (including revised center boundaries under the Revised Proposal).

2 Includes boundary revision under the Revised Proposal as compared to the FEIS Preferred Alternative. Note that additional acreage in the Graham Urban Center under the Revised Proposal is a result of minor differences in the GIS boundary layer and rounding but that no boundary revisions were made after the FEIS (prior to Council Amendments or as part of Council Select Committee Amendments).

3 Council Select Committee Amendments rename the Upper Queen Anne Urban Center to Queen Anne Urban Center (Amendment 51) and the Judkins Park Urban Center to Central District South Urban Center (Amendment 114). The Pinehurst–Haller Lake Urban Center was also previously referred to as the 130th Street Urban Center under FEIS Alternatives 2-5 but was renamed to Pinehurst–Haller Lake as part of the FEIS Preferred Alternative.

Note: Activity units (AU) are the sum of residential population and jobs. Highlighted urban centers fall outside King County’s countywide center designation criteria of 160–500 acres or below the minimum 18 existing AU or 30 future AU per acre. MIC designation criteria from PSRC does not include an AU density threshold.

Sources: OFM SAEP April 1 census block estimates, 2023, 2024, and 2025; PSRC, 2023 and 2024; City of Seattle, 2025; BERK, 2025.

Future growth under the Revised Proposal is likely to increase the frequency of different land use types locating close to one another, and similarly likely to increase the frequency of land use patterns that contain mixes of land uses with differing levels of intensity, both within the centers and, to a varying extent, in other areas of the city. Denser and more mixed-use land use patterns in the new place types could result in localized land use compatibility impacts within the place types or on the border with adjacent residential areas. All neighborhood centers, for instance, already contain areas zoned for commercial or mixed-use development but additional jobs and commercial space could increase more quickly in these areas due to the local demand from new housing. Impacts to land use patterns and compatibility would continue to be mitigated through application of the City’s development regulations (including shoreline regulations) and possibly design review, if applicable. Adverse compatibility impacts at the

periphery of most existing centers would also be minimized as the new place types redevelop with denser development. Likewise, increased density citywide would lessen potential adverse compatibility impacts on the periphery of all new urban centers and neighborhood centers. See also the summary of **Transitions** below.

Regional & Urban Centers

Impacts within most of the regional and urban centers under the Revised Proposal would be similar to those described for the FEIS Preferred Alternative. In Area 3 (see **Exhibit 1-4**), the area proposed to be moved from the Uptown Regional Center to the renamed Queen Anne Urban Center (on the south slope of Queen Anne Hill) via Amendment 51 is predominantly in multifamily use with some single-family dwellings. Future land use patterns under the Revised Proposal would be slightly less dense and smaller in scale than the FEIS Preferred Alternative even as these areas redevelop with more mixed use. Amendment 51 also removes three blocks between Ward Street / Aloha Street and Warren Avenue N / Nob Hill Avenue N from either center and removes a small area from the northwest corner of the Queen Anne Urban Center. Changes made prior to Council amendments removed an additional two blocks between Ward Street / Prospect Street and Warren Avenue N / 3rd Avenue N from the Uptown Regional Center and removed several blocks from the west, north, and east sides of the Queen Anne Urban Center. These areas are mostly comprised of existing multifamily and single-family dwellings and, over time, could redevelop at similar densities consistent with Neighborhood Residential zoning. Overall, the Uptown Regional Center and Queen Anne Urban Center would also continue to meet PSRC and King County center designation criteria as described above and in **Exhibit 2-5**.

Council Select Committee Amendment 37 and changes made prior to Council amendments remove a small area west of 45th Avenue SW / Fauntleroy Way SW and east of Beveridge PL SW / 47th Avenue SW from the Morgan Junction Urban Center (see **Exhibit 1-7**). The areas contain mostly single-family dwellings, and Beveridge Pl SW is a narrow street without sidewalks that is less appropriate for higher-density housing. Changes to the center boundary made prior to Council amendments also removed a small area east of California Avenue SW and south of SW Orchard Street from the center consisting of townhomes and one smaller multifamily building. Over time, these areas could redevelop at similar densities consistent with Neighborhood Residential zoning and available infrastructure. The Morgan Junction Urban Center would also continue to meet King County center designation criteria as described above and shown in **Exhibit 2-5**.

Other changes made to urban center boundaries after the FEIS but prior to Council Select Committee Amendments include 25 acres removed from the Greenwood Urban Center in Area 1 (**Exhibit 1-2**), 12 acres removed from the Pinehurst-Haller Lake Urban Center in Area 2 (**Exhibit 1-3**), and 32 acres removed from the Admiral Urban Center in Area 6 (**Exhibit 1-7**). Areas removed from the Admiral Urban Center in the northwest and northeast include mostly single-family dwellings with some duplexes and townhomes and limited commercial near SW Admiral Way in the west. Areas removed from the Greenwood Urban Center consist of mostly single-family dwellings with a few duplexes and one preschool. The area removed from the Pinehurst-Haller Lake Urban Center south of N 130th Street and west of Northacres Park

consists of single-family dwellings. Future development under Neighborhood Residential zoning in these areas would likely continue to be similar in scale and intensity to the primarily existing single-family and limited smaller scale multifamily uses. The Admiral, Greenwood, and Pinehurst-Haller Lake Urban Centers would continue to meet King County center designation criteria as described above and shown in [Exhibit 2-5](#).

Neighborhood Centers

Over time, land use patterns in the neighborhood centers would intensify under the Revised Proposal and potential compatibility impacts in the neighborhood centers would be similar to those described for the FEIS Preferred Alternative. A little less than half (49%) of housing growth in neighborhood centers would be directed into those with low displacement risk in areas 1 and 2 and about 21% would be directed into neighborhood centers with high displacement risk (generally in areas 6, 7, and 8). Areas added to the neighborhood centers could redevelop at higher densities and intensities, including more mixed-use development and commercial, than under the FEIS Preferred Alternative. These areas are currently comprised primarily of existing single-family and multifamily development with some commercial development. This may result in some localized compatibility conflicts—both within the centers and with development adjacent to the centers—as areas redevelop due to changes in the mix of land use, increased intensity, and height of new development. Future development in areas removed from the neighborhood centers would likely continue to be similar in scale and intensity to the primarily existing single-family and smaller scale multifamily uses (e.g., duplexes and townhomes). More information about existing land use patterns and intensities of development in each of the revised neighborhood centers is included below:

- Area 1: Amendment 42 establishes a new East Ballard Neighborhood Center, generally centered on the intersection of NW 65th Street and 8th Avenue NW, and removes the Phinney Ridge Neighborhood Center. The new East Ballard Neighborhood Center is currently comprised of some commercial development fronting NW 65th Street and 8th Avenue NW (e.g., Ballard Goodwill) as well as primarily single-family dwellings, duplexes, and townhomes elsewhere. See [Exhibit 1-2](#).
- Area 1: Amendment 48 extends the Upper Fremont Neighborhood Center to the north, south, and west. The expanded center would include BF Day Playground and other existing single-family intermixed with multifamily and commercial uses. One block to the southwest of Fremont Ave N and N 42nd Street would also be removed from the center, comprised of mostly single-family and some multifamily dwellings. See [Exhibit 1-2](#).
- Area 1: Amendment 49 would rename the West Green Lake Neighborhood Center to the Northwest Green Lake Neighborhood Center and, in combination with changes made to the center boundary prior to Council amendments, would contract the boundaries to the south and west and expand to the north and east. The expanded center area includes additional commercial development on Aurora Ave N, NE 80th Street, and W Green Lake Drive as well as townhomes and multifamily (generally east and west of Green Lake Drive N) and single family interspersed with duplexes and townhomes (generally west of Green Lake Drive N). The

areas removed from the center east of Fremont Avenue N / west of Linden Avenue N and Auroura Avenue N to the west and south are mostly single-family dwellings. See [Exhibit 1-2](#).

- Area 1: The Whittier Neighborhood Center was contracted on the west and east and expanded to the south (up to the Ballard Regional Center boundary) prior to Council Select Committee Amendments. The expanded center encompasses commercial, mixed-use, and multifamily development near 15th Avenue NW, Ballard High School, the Ballard Swimming Pool, and surrounding single-family and multifamily dwellings. Areas removed from the center to the west of 17th Avenue NW and east of 14th Avenue NW and Alonzo Avenue NW include mostly single-family dwellings as well as Whittier Elementary. See [Exhibit 1-2](#).
- Area 2: The Bryant Neighborhood Center was contracted prior to Council Select Committee Amendments. The areas to be removed include the Ronald McDonald House in the south and one block to the north and west of NE 55th Street and 40th Ave NE, respectively, comprised of single-family dwellings and one multifamily structure. The center boundary was also slightly redrawn along NE 52nd Street to include a portion of the Burke-Gilman trail. See [Exhibit 1-3](#).
- Area 2: Amendment 40 removes approximately four and a half blocks from the southwest corner of the Ravenna Neighborhood Center that is within the Ravenna-Cowen Historic District (a national historic district). The area to be removed includes commercial uses on the south side of N 65th Street west of Ravenna Avenue NE and single-family dwellings elsewhere. See [Exhibit 1-3](#).
- Area 3: Amendment 44, in combination with small changes made to the center boundary prior to Council amendments, expands the Magnolia Village Neighborhood Center to the north and contracts the center in the south. The expanded center would encompass the West Magnolia Playfields, Mounger Pool, Catherine Blaine Junior High, and the Magnolia Branch of the Seattle Public Library and primarily single-family dwellings with limited multifamily elsewhere. Areas removed from the center in the south include mostly single-family with some townhome uses and a church. See [Exhibit 1-4](#).
- Area 3: Amendment 45, in combination with a small change made to the center boundary prior to Council amendments, expands the North Magnolia Neighborhood Center to the north along W Government Way and contracts the center in the south and east from W Bertona to W Thurman Street (with the exception of commercial and multifamily areas fronting 34th Avenue W) and between 33rd Avenue W and 32nd Avenue W. The expanded center would encompass additional commercial and multifamily development on W Government Way and primarily single-family with limited multifamily dwellings elsewhere. Areas removed from the center in the south and east include mostly single-family dwellings with some duplexes and townhomes. See [Exhibit 1-4](#).
- Area 5: A few blocks were removed from the southwest corner of the Madison Park Neighborhood Center prior to Council Select Committee Amendments (between E Blaine Street / McGilvra Blvd E and E Garfield Street / 38th Avenue E). Areas removed from the center are mostly single-family dwellings with one four-plex on E Madison Street. See [Exhibit 1-6](#).

- Area 5: Amendment 38, in combination with a small change made to the center boundary prior to Council Select Committee Amendments, contracts the Madrona Neighborhood Center one block on the east and one to two blocks on the west (generally located west of 32nd Avenue E and east of 35th Avenue E). These areas are occupied predominantly by single-family homes with scattered duplexes and include some steep slope environmental critical areas not suitable for additional density. See [Exhibit 1-6](#).
- Area 5: The Montlake Neighborhood Center was expanded in the northwest and contracted in the east prior to Council Select Committee Amendments. The expanded center would encompass a few blocks of existing single-family dwellings and staging for construction equipment between the SR-520 interchange / E Louisa Street and East Montlake Place E / West Montlake Place E. Areas removed from the center east of 25th Avenue E include mostly single-family dwellings. See [Exhibit 1-6](#).
- Area 6: Amendment 35, in combination with a small change made to the center boundary prior to Council amendments, removes approximately two blocks on the west side and one block on the east side of the renamed Fauntleroy Neighborhood Center. The blocks removed on the west consist predominantly of single-family dwellings bordering neighborhoods (with mostly dead-end streets to the south of the removed area). The area removed generally east of 44th Avenue SW includes Fauntleroy Schoolhouse, now in use as a community center/childcare center, and part of Kilbourne Park as well as some single-family dwellings. See [Exhibit 1-7](#).
- Area 6: Amendment 36 adds one block on the north side of the High Point Neighborhood Center. This area includes the High Point library on its northwest corner with a mix of multifamily and mixed-use structures elsewhere. See [Exhibit 1-7](#).

Corridors

Housing growth in the corridors under the Revised Proposal would be spread over a similar share of land area as the FEIS Preferred Alternative and would be focused in Area 2 followed by areas 1, 8, 5, and 6. Like the FEIS Preferred Alternative, overall land use patterns would become denser over time within the corridors. This could result in localized land use compatibility impacts within the corridors or on the border with adjacent residential areas where newer development is of greater height and intensity than existing development (see also the [Urban Form](#) section below).

Urban Neighborhoods

Urban neighborhood areas would accommodate a similar amount of growth under the Revised Proposal as the FEIS Preferred Alternative (see [Exhibit 1-11](#)). More than half (57%) of the additional new housing growth in urban neighborhood areas would still be directed into areas 1 and 2. Like the FEIS Preferred Alternative, land use patterns within the Neighborhood Residential zones would become denser over time but most of this development would continue to be residential in nature. A small number of jobs and commercial space would shift from the regional and urban centers towards urban neighborhood areas to reflect local demand consistent with the

distribution of new housing. More flexibility for commercial space in these areas would also support the development of neighborhoods where more people can walk to everyday needs.

Urban Form

The following Council amendments directly relate to urban form:

- **Building heights in Neighborhood Centers.** Amendment 33 added language stating “Buildings greater than 6 stories may be appropriate in Neighborhood Centers near light rail stations.”
- **Center boundary changes.** Several center boundaries were updated, meaning that potential heights increased or decreased in small areas throughout the city.
- **Neighborhood Residential code updates.** The Council amendments include changes to:
 - Attached middle housing bulk and scale parameters (Amendments 70, 95, and 113).
 - Stacked flats bulk and scale, landscape/tree canopy, and accessibility parameters and incentives (Amendments 70, 79, 85, 90, and 91).

These generally increased the potential for larger and taller buildings. They are also expected to result in slightly less new townhome production in Neighborhood Residential zones and more stacked flats (such as condos and apartments). Specific changes and prototypical Neighborhood Residential developments that make use of these changes are described in [Appendix A](#).

Height, Bulk, & Scale

Building heights in Neighborhood Centers. The FEIS Preferred Alternative analyzed heights up to 75 feet (generally 7-story buildings) in Neighborhood Centers. Several centers near light rail and amenities already have Urban Center (up to 145 feet or 14 stories) or Regional Growth Center (up to high rises) designations, which means even taller heights have been analyzed in most of the priority locations. Amendment 30 may imply approximately 85-foot (8-story) height limits in Neighborhood Center light rail station areas. New light rail station areas with Neighborhood Center designations, where this Amendment is most applicable, include Delridge and Dravus Neighborhood Centers. For Delridge, an 8-story building would be perceived similarly to a 7-story building, which was analyzed for Neighborhood Centers under the FEIS Preferred Alternative. For Dravus, residential areas already allow 8 stories. See [Exhibit 2-6](#).

Neighborhood (30 to 40 feet height [3 to 4 stories]) and Corridors (55 feet or taller depending on existing zoning [5 stories or more]) place types, and included zoning for various Neighborhood Residential (NR), Low Rise (LR), and Neighborhood Commercial (NC) zones. Specific expansions and potential height increases, as compared to the FEIS Preferred Alternative, include the following:

- Whittier—Neighborhood Center expansion southward around 15th Ave NW. Designation shifts from Urban Neighborhood (30 to 40 feet) and Corridors (55 feet) to Neighborhood Center.
- Northwest Green Lake—A portion of the expansion area (north of the existing center) shifts from Urban Neighborhood (30 to 40 feet) and Corridors (55 feet) to Neighborhood Centers (75 feet).
- Upper Fremont—Expansion in the northwest corner and west of Aurora Ave N shifts from Urban Neighborhood (30 to 40 feet) and Corridors (55 feet) to Neighborhood Center.
- North Magnolia—Expansion area northward shifts from Urban Neighborhood (30 to 40 feet) to Neighborhood Center.
- High Point—An expansion in the northeast area shifts from Corridors (55 feet) and existing zoning of NC2-55 and LR3 (5 stories) and small area of LR2 (40 feet) to Neighborhood Center. (Most was already included in the Alternative 5 Neighborhood Center (75 feet) place type).

Together, these changes encompass relatively small areas and meet the intent of the form and scale for Neighborhood Centers and other growth strategy place types. Most expansion areas had been analyzed with the Corridors place type in Alternative 5, which assumed up to 5-story buildings and more in existing multifamily and commercial zones. Five-story buildings are perceived from the ground similarly to 6- and 7-story buildings, proposed by the Council Amendments.

Neighborhood Residential code updates. As noted in the FEIS (FEIS page 3.6-171), building bulk and scale differences between existing 1- and 2-story buildings may be more pronounced where buildings make use of height and floor area (FAR) bonuses for providing affordable units. The Council Amendments include additional bonus opportunities for stacked flats to achieve 4 stories if they meet certain standards such as Green Factor, tree retention, and accessibility.

In addition, they remove parking requirements for stacked flats, meaning that stacked flat developments opting to not include parking would have more space available for trees, landscaping, greater floor area, or other amenities. More variety in building configuration would be available without the constraints of orienting the buildings to parking areas, fewer driveways would cut through the sidewalk to the street, and less parking would abut alleys. It also allows the ground floor to include usable space that better relates to the street or private open space, offering greater opportunities for “eyes on the street” and chance interactions with neighbors. However, though parking would not be required, many developers would continue to provide parking.

The removal of lot coverage and density limits for ADA-accessible units would mean buildings could build to 4 stories and would be limited by setbacks, provision of amenity area (25% of lot area) unless making use of the tree canopy bonus, and meeting Green Factor (typically providing landscaping). This outcome could result in some slightly larger buildings. From the street, these would be perceived similarly to the “affordable housing with bonus” illustrated in the FEIS Appendix G.2 Updating Seattle’s Neighborhood Residential Zoning.

The Council Amendments propose a greater floor area ratio (FAR) allowance for attached Neighborhood Residential units. This may result in larger buildings, but lot coverage, setbacks, and the provision of parking (optional in some locations) would continue to limit floor area.

The changes to Neighborhood Residential setback regulations generally reduce flexibility for ADUs and lower density middle housing types and preserve space along the rear lot line for yards. Expanding the required rear setback from 5 feet for ADUs to 15 feet limits opportunities throughout Neighborhood Residential zones to build ADUs and carriage houses (dwelling units above garages). The expansion of front setbacks from 10 feet to 15 feet for 1-2-unit development preserves space for front yard landscape and reduces flexibility for a larger rear yard or larger units, while keeping opportunities for spontaneous social interaction between people on the sidewalk and people in their front yard the same. Along alleys, the FEIS Preferred Alternative setback language that excepted side setbacks along an alley provided flexibility for carriage houses and ADUs along alleys, which the Council Amendments removed.

Together, the Neighborhood Center height changes and boundary changes, and the Neighborhood Residential code updates, include modest changes. These impacts to height, bulk, and scale are considered insignificant.

Transitions

The potential for more stacked flats making use of the 4-story bonus slightly increases the opportunity for taller buildings to develop adjacent to 1- and 2-story buildings. This is considered a natural evolution of the urban environment, and in many cases, may provide desired urban form characteristics (e.g., trees, larger rear yards, family-sized units) better than other development types. In addition, the addition of taller buildings in broad areas across the city eases the transition to the more intense centers.

Tree Canopy

Stacked flat bonuses for trees, especially when developments opt to make use of the removal of parking requirements, would likely result in more trees retained on private property. Setback amendments requiring 15-foot rear setbacks in NR lower density (1-2 units per lot) developments could result in larger rear yards, which may encourage trees in rear yards. These are considered modest positive impacts to tree canopy, tempered by the limited available root zone for large, healthy trees on small lots when utilizing full lot coverage and FAR.

Equity Considerations

Stacked flats are more likely to provide multi-bedroom, larger units on single floors that are considered family friendly. Similarly, with one unit on a single floor, ground floor units are often accessible to people with mobility impairments and seniors, and when paired with elevators, upper story units can be ADA-accessible. For these reasons, providing additional incentives for stacked flats has equity benefits.

130th/145th Station Area

Land use patterns and compatibility. Under the FEIS Preferred Alternative and Revised Proposal, the newly designated Pinehurst-Haller Lake Urban Center and Olympic Hills Neighborhood Center would likely redevelop into mixed-use nodes with more growth at greater heights clustered in the newly designated centers (see [Exhibit 1-3](#)). Activity levels and land use intensities would increase resulting in greater impacts to land use patterns, with slightly higher future activity units per acre expected in the Pinehurst-Haller Lake Urban Center and slightly lower future activity units per acre expected in the Olympic Hills Neighborhood Center under the Revised Proposal compared to the FEIS Preferred Alternative (see [Exhibit 2-7](#)). Compatibility impacts would be similar to those described citywide the FEIS Preferred Alternative for neighborhood and urban centers.

Exhibit 2-7. Station Area Share of Targets, 2024-2044—Preferred Alternative vs. Revised Proposal

Location	Place Type	Acres	New Housing Units ¹	New Jobs ¹	Activity Units (Existing)/Ac. ²	Activity Units (Future)/Ac. ²
Preferred Alternative						
Pinehurst–Haller Lake	Urban Center	217	1,500	360	17.3	33.2
Olympic Hills	Neighborhood Center	53	652	298	39.2	69.6
Revised Proposal						
Pinehurst–Haller Lake	Urban Center	205	1,500	360	18.3	35.9
Olympic Hills	Neighborhood Center	53	659	277	39.1	69.4

1 See [Exhibit 1-13](#).

2 Existing activity units per acre by center are based on OFM’s 2023 SAEP April 1 census block estimate of total population and PSRC’s 2023 (Preferred Alternative) and 2024 (Revised Proposal) estimate of all jobs (estimated by starting with ESD Q1 Covered Employment and estimating the remaining jobs not covered by unemployment insurance) within the center boundaries. Future 2044 population by center was calculated using OFM’s 2023 housing unit estimate, additional housing unit permits issued between April 1, 2023 and June 1, 2024 (since the 2023 OFM estimate), a citywide household occupancy rate of 93%, estimated existing people per household by center (per OFM’s 2023 household and population estimates), and housing unit growth targets. Future 2044 jobs by center were calculated using PSRC’s 2023 (Preferred Alternative) or 2024 (Revised Proposal) covered employment estimate and job growth targets. Future 2044 activity units per acre for each center are based on the combined estimated 2044 population and jobs and acres within each center (including amended center boundaries under the Revised Proposal). Sources: OFM, 2023 (estimates of 2023 housing, households, household population, and group quarter population are from OFM’s SAEP April 1 census block estimates); PSRC, 2023; City of Seattle, 2024; BERK, 2024.



The Revised Proposal poses no significant changes to height, bulk, and scale; transitions; tree canopy; shadows; or views in 130th/145th Station Area beyond the changes discussed citywide.

2.2.3 Summary Comparison to FEIS Results

Exhibit 2-8 summarizes and compares adverse land use impacts citywide and within the 130th/145th station areas under the FEIS Preferred Alternative and Revised Proposal. No major differences are expected.

Exhibit 2-8. Summary of Land Use and Urban Form Impacts, Citywide and 130th/145th Station Areas—Preferred Alternative vs. Revised Proposal

Impact	Citywide		130 th /145 th Station Areas	
	Preferred Alternative	Revised Proposal	Preferred Alternative	Revised Proposal
Land Use Patterns	▼	▼	▼	▼
Land Use Compatibility	▽	▽	▽	▽
Height, Bulk, & Scale	▼	▼	▼	▼
Transitions	▲	▲	▲	▲
Tree Canopy	▼	▼	▼	▼
Shadows	▼	▼	▼	▼
Views	▽	▽	▽	▽

Note: Impacts are considered either unavoidable adverse (▼▼), adverse but able to be mitigated (▼), impact but less than adverse (▽), limited or none (—), moderately positive (▲), or positive (▲).
Sources: BERK, 2025; MAKERS, 2025.

Over time, additional growth and development will occur in Seattle and a generalized increase in development intensity, height, bulk, and scale is expected under the FEIS Preferred Alternative and Revised Proposal—this gradual conversion of lower-intensity uses to higher-intensity development patterns is unavoidable but an expected characteristic of urban population and employment growth. Like the FEIS Preferred Alternative, no significant unavoidable adverse impacts to land use patterns, compatibility, or urban form are expected under the Revised Proposal.

Future growth under the FEIS Preferred Alternative and Revised Proposal is likely to result in temporary or localized land use impacts as development occurs. The potential impacts related to these changes differ slightly in intensity and location but are generally expected to resolve over time. For example, areas added to the centers could redevelop at higher densities and intensities than under the FEIS Preferred Alternative. Application of the City’s development regulations and zoning requirements are anticipated to sufficiently mitigate these impacts.



2.3 Housing

2.3.1 Background

Context

This section evaluates the housing impacts of the Revised Proposal, with comparison to the FEIS Preferred Alternative. It includes many of the same types of impact analysis presented in the FEIS. For a more detailed discussion of evaluation methods, see the FEIS.

Thresholds of Significance

The FEIS analyzes six distinct types of impacts to evaluate the alternatives. This addendum includes the same analysis to compare the impacts of the Revised Proposal to the FEIS Preferred Alternative.

- **Housing Supply.** Is the alternative expected to increase the total supply of market housing compared to No Action?
- **Housing Diversity.** Is the alternative expected to increase the diversity of market housing options compared to No Action?
- **Affordability of New Market Housing.** Is the alternative expected to support the affordability of new market housing options compared to No Action?
- **Production of New Affordable Units.** Is the alternative expected to increase the total supply of income-restricted affordable housing through the Mandatory Housing Affordability (MHA) and Multifamily Tax Exemption (MFTE) programs, compared to No Action?
- **Economic displacement.** Is the alternative expected to reduce economic displacement pressure due to rising housing costs, compared to No Action?
- **Physical displacement.** Is the alternative expected to reduce physical displacement pressure due to demolition of existing units, compared to No Action?

2.3.2 Analysis

Housing Supply & Diversity

Growth under the Revised Proposal would have a similar impact on overall housing supply when compared to the FEIS Preferred Alternative. However, new incentives for stacked flats in the Revised Proposal are expected to result in slightly less new townhome production in Neighborhood Residential zones and more condos and apartments. This decrease in expected

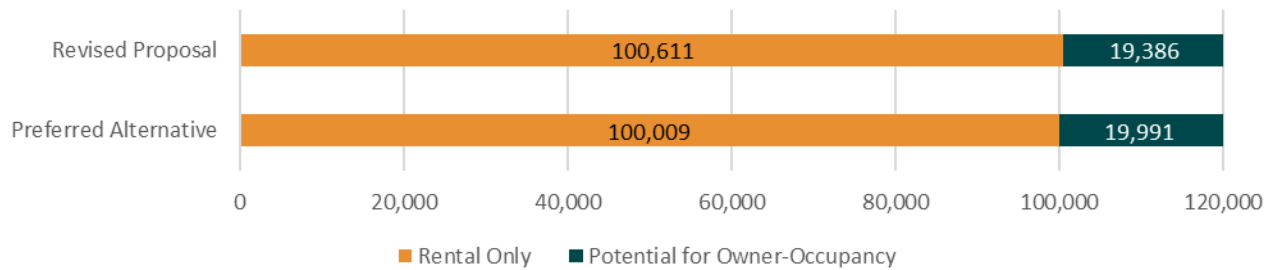
townhouse production would be expected to slightly decrease the supply of housing with potential for owner-occupancy. See [Exhibit 2-9](#) and [Exhibit 2-10](#).

Exhibit 2-9. Projected Net New Housing Units by Housing Type

	Preferred Alternative	Revised Proposal	Difference
Non-Stacked			
Greater than 2,000 sq ft	4,132	4,131	-1
1,200 - 2,000 sf	14,766	13,584	-1,182
Less than or equal to 1,200 sf	6,675	6,673	-1
Stacked			
Condo	3,322	3,912	590
Apartment	91,106	91,693	587
Total	120,000	119,993*	-7

* Total net housing growth is effectively 120,000, and the difference is due to rounding errors.
Sources: City of Seattle, 2025; BERK, 2025.

Exhibit 2-10. Projected Net New Housing Units by Tenure



Sources: City of Seattle, 2025; BERK, 2025.

Affordability of New Market-rate Housing Supply

The balance of housing supply with the demand for housing in Seattle is a major contributing factor to market housing costs. Rising demand for new housing creates competition for a limited supply of homes. This causes upward pressure on rents and sales prices. Both the Revised Proposal and Preferred Alternative would increase housing supply by about 120,000. However, the Revised Proposal would encourage slightly more stacked flat housing types in Neighborhood Residential zones. This would likely result in additional smaller units available for rent and fewer larger townhomes available for purchase. This would result in more lower cost market-rate housing options compared to the FEIS Preferred Alternative.

Production of New Affordable Units through MHA & MFTE

The Revised Proposal is expected to produce approximately the same number of new affordable housing units through the Multifamily Tax Exemption and Mandatory Housing Affordability (MHA) programs. [Exhibit 2-11](#) shows a very small reduction in MHA units when compared to the FEIS Preferred Alternative.

Exhibit 2-11. Projected Net New Income Restricted Affordable Units Through MHA-Residential

	Preferred Alternative	Revised Proposal	Difference
Performance Units	1,524	1,523	-1
Payment Units	12,338	12,327	-11
	13,862	13,850	-12

Sources: City of Seattle, 2025; BERK, 2025.

Loss of Housing Stock through Demolition

Demolition of older housing is expected to continue under all alternatives as parcels with older homes are redeveloped with newer and higher-density housing. The Revised Proposal is expected to result in a very small reduction in demolitions compared to the FEIS Preferred Alternative, as shown in [Exhibit 2-12](#). This reduction is primarily due to new density bonuses in the Neighborhood Residential, which would be expected to produce more net new units on each lot. This reduces the number of homes that would be demolished for the same total amount of growth.

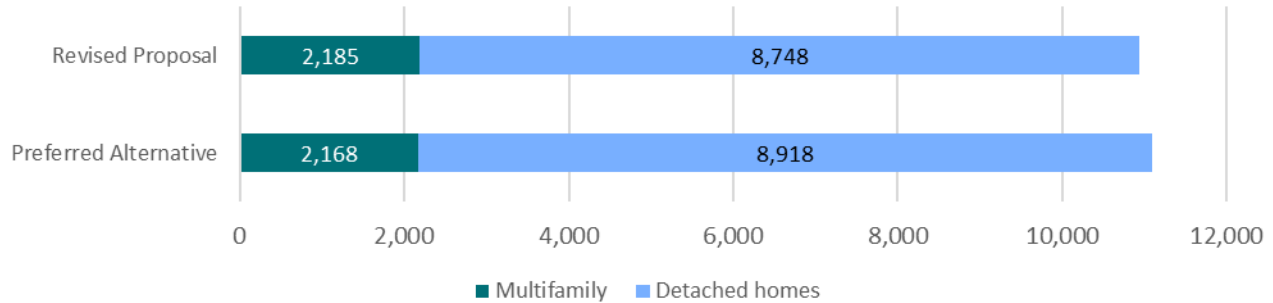
Exhibit 2-12. Projected Housing Units Demolished by EIS Analysis Area

	Preferred Alternative	Revised Proposal	Difference
Area 1	2,970	2,964	-6
Area 2	2,657	2,595	-62
Area 3	923	904	-19
Area 4	797	797	0
Area 5	1,213	1,186	-27
Area 6	1,492	1,463	-29
Area 7	144	143	-1
Area 8	890	881	-9
Total units demolished	11,086	10,933	-153
Total net new units	120,000	120,000	
Ratio of net new units to units demolished	10.8	11.0	

Sources: City of Seattle, 2025; BERK, 2025.

The Revised Proposal is expected to result in slightly fewer detached homes demolished compared to the FEIS Preferred Alternative, as shown in [Exhibit 2-13](#). Both alternatives are expected to result in a similar number of demolished multifamily units.

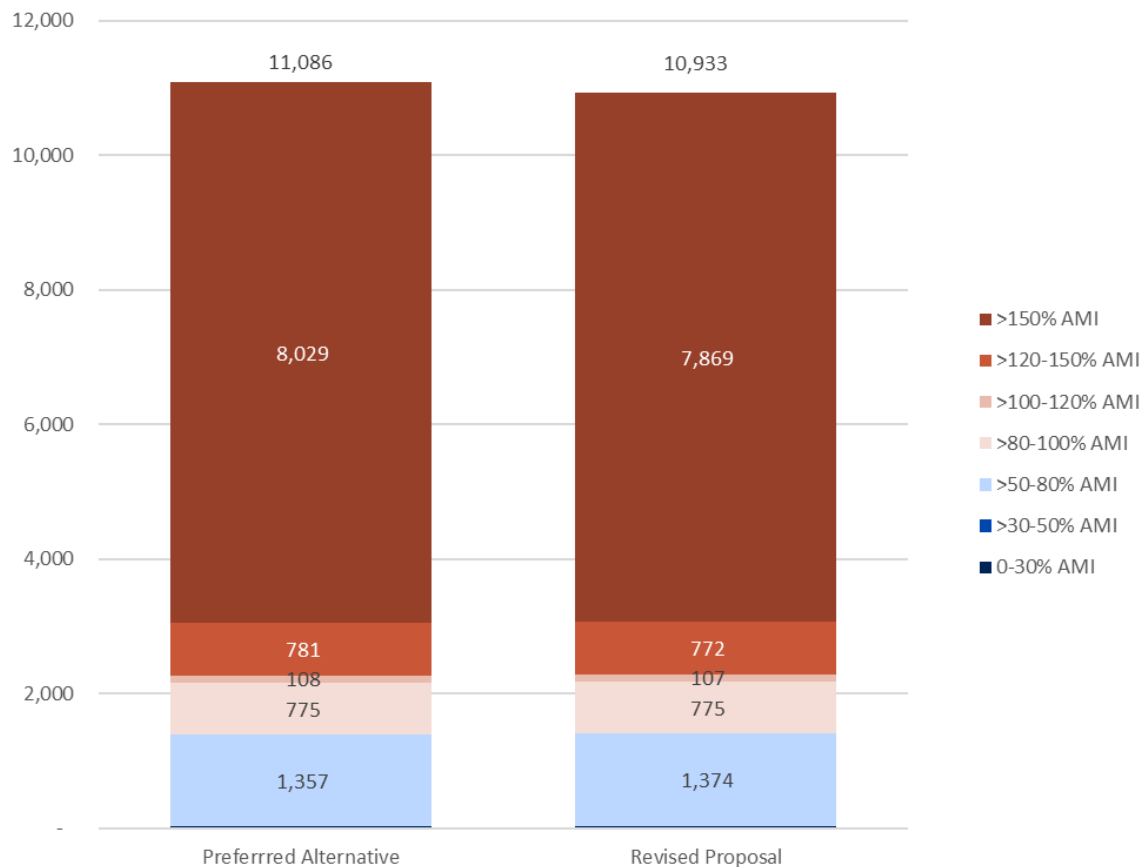
Exhibit 2-13. Projected Housing Units Demolished by Housing Type



Sources: City of Seattle, 2025; BERK, 2025.

Under both the Preferred Alternative and Revised Proposal, the majority of units demolished are expected to be detached homes that would be affordable only to households with incomes above 150% AMI, as shown in [Exhibit 2-14](#). Among lower income bands, the breakdown of demolished units by affordability level is nearly identical.

Exhibit 2-14. Projected Housing Units Lost to Demolition by Affordability Level

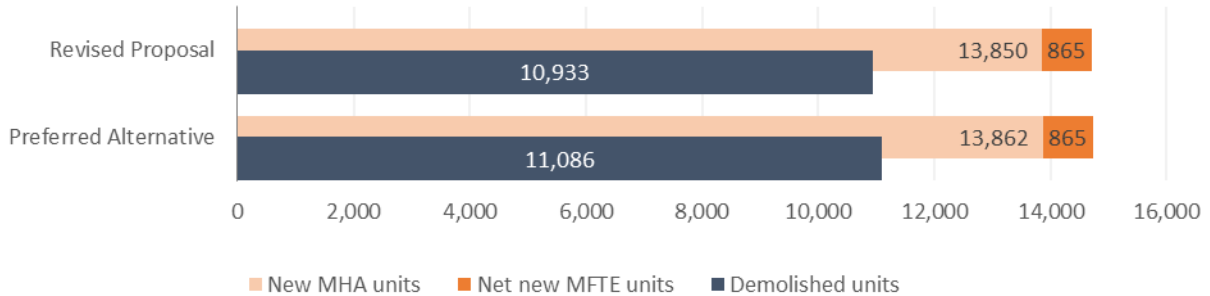


Sources: City of Seattle, 2025; BERK, 2025.



In both the Revised Proposal and Preferred Alternative, the projected number of demolished units is expected to be less than the production of new income-restricted affordable units through MHA and MFTE. See [Exhibit 2-15](#).

Exhibit 2-15. Comparison of Demolished Units to New Affordable Housing from MHA and MFTE



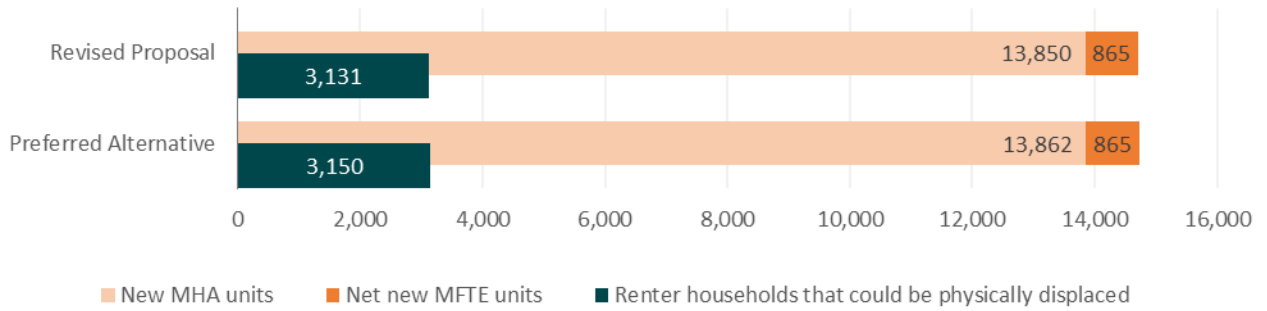
Sources: City of Seattle, 2025; BERK, 2025.

Displacement

Economic, cultural, and physical displacement are expected to continue to be a challenge in Seattle in years to come. However, the increased capacity for housing production, increased diversity of housing types, and increased supply of income-restricted affordable housing expected in both the Revised Proposal and Preferred Alternative are expected to reduce housing cost escalation and support greater housing affordability when compared to FEIS Alternative 1 (No Action). The impacts of the Revised Proposal on displacement are expected to be very similar to the FEIS Preferred Alternative.

Physical displacement can result from the demolition of older housing to make way for newer home production. However, not all demolitions result in the physical displacement of a household. One way to conservatively estimate the number of households that could potentially be displaced is estimating the number of renter households in demolished units. This analysis is shown in [Exhibit 2-16](#), with comparison to income-restricted affordable housing production. It shows very little difference between the Revised Proposal and Preferred Alternative. In both cases Seattle is expected to gain many more affordable housing units than the number of renter households that could be physically displaced.

Exhibit 2-16. Renter Households Physically Displaced Compared to New Income-Restricted Affordable Units from MHA or MFTE



Sources: City of Seattle, 2025; BERK, 2025.

2.3.3 Summary Comparison to FEIS Results

This analysis shows that the Revised Proposal is expected to have very similar impacts on housing and the Thresholds of Significance, when compared to the FEIS Preferred Alternative. All impacts fall within the range of outcomes evaluated in the FEIS.

2.4 Transportation

2.4.1 Background

Context

This section evaluates the transportation impacts of the Revised Proposal which has a similar magnitude of household and employment growth as the FEIS Preferred Alternative. The SoundCast travel demand model (used for the Draft and Final EIS) was updated to reflect the Revised Proposal and the potential impacts of this scenario were qualitatively identified. The transportation network assumptions are consistent with the adopted Seattle Transportation Plan (STP) and the alternatives evaluated in the FEIS.

Thresholds of Significance

This section outlines the thresholds used to determine the impacts of the Revised Proposal. The expected conditions under the FEIS Alternative 1 (No Action) are used as the baseline against which the Revised Proposal is measured. In addition to the quantitative thresholds defined below, potential impacts to active transportation and safety are addressed qualitatively.

A significant transportation impact under the Revised Proposal is identified if:

- VMT per capita would exceed the VMT per capita under the No Action Alternative.
- A subarea that does not exceed its SOV mode share target under the No Action Alternative would exceed its SOV mode share target or a subarea that exceeds its SOV mode share target under the No Action Alternative would have an increase in SOV mode share of at least 1% compared to the No Action Alternative.
- A study route that would operate at or under the transit agency crowding threshold under the No Action Alternative would operate over the transit agency crowding threshold or a study route identified as operating over the transit agency crowding threshold under the No Action Alternative would have an increase in passenger load of at least 5% compared to the No Action Alternative.
- A corridor that would have a travel time LOS grade of A-E under the No Action Alternative would operate at LOS F or a corridor that would have a travel time LOS grade F under the No Action Alternative would have an increase in travel time of at least 5%.
- A screenline that would not exceed the V/C threshold under the No Action Alternative would exceed the V/C threshold or a screenline that would exceed the V/C threshold under the No Action Alternative would increase the V/C ratio by at least 0.01.
- The action alternative would cause an intersection that operated acceptably under No Action Alternative to operate unacceptably, or the action alternative would add at least a 5

second delay from the No Action Alternative at an intersection that operated unacceptably under the No Action Alternative.

- A state facility that would meet WSDOT’s standards under the No Action Alternative would exceed WSDOT’s standards or a state facility that does not meet WSDOT’s standards under the No Action Alternative would increase the volume-to-LOS service volume ratio by at least 0.01 compared to the No Action Alternative.

2.4.2 Analysis

The cumulative effect of the Revised Proposal on land use assumptions is less than a 1% change in total households and employment within each city sector compared with the FEIS Preferred Alternative. Changes of this small magnitude result in materially similar results when comparing alternatives. The analysis results included below demonstrate that the citywide results are consistent with the FEIS Preferred Alternative and the number and magnitude of impacts in the Revised Proposal would be the same or less. Representative metrics were quantitatively evaluated while others were extrapolated and qualitatively assessed.

VMT per Capita

Exhibit 2-17 summarizes vehicle miles traveled (VMT), vehicle hours traveled (VHT), and average trip speed with the Revised Proposal relative to the FEIS Preferred Alternative. The Revised Proposal would result in slightly lower total VMT and VHT (<1%) but similar per capita estimates and average vehicle trip speed. Since both alternatives have VMT per capita lower than the FEIS No Action Alternative, there is no impact with the Revised Proposal for this metric.

Exhibit 2-17. Daily VMT, VHT, and Average Trip Speed

Metric	FEIS Preferred Alternative		Revised Proposal	
	Total	Per Capita	Total	Per Capita
VMT	25,216,800	13.2	25,077,700	13.2
VHT	925,000	0.5	918,600	0.5
Average Trip Speed	27.3	—	27.3	—

Source: Fehr & Peers, 2025.

Mode Share

Exhibit 2-18 summarizes the SOV mode share expected with the Revised Proposal compared to the FEIS Preferred Alternative. The SoundCast model predicts that the SOV mode shares would be very similar to the FEIS Preferred Alternative, only differing by 1% in Northwest Seattle and Northeast Seattle. Even with that increase, both of those sectors would have SOV shares within their target and therefore are not considered to be an impact. Although the Duwamish sector

would exceed its target with both the FEIS Preferred Alternative and Revised Proposal, the SOV mode share is projected to be slightly lower than with FEIS Alternative 1 No Action. Therefore, the Revised Proposal is not expected to have a significant impact to mode share.

Exhibit 2-18. PM Peak Hour SOV Mode Share

Sector	SOV Target	Preferred Alternative SOV Share	Revised Proposal SOV Share
(1) Northwest Seattle	37%	31%	32%
(2) Northeast Seattle	35%	24%	25%
(3) Queen Anne/Magnolia	38%	32%	32%
(4) Downtown/Lake Union	18%	10%	10%
(5) Capitol Hill/Central District	28%	26%	26%
(6) West Seattle	35%	33%	33%
(7) Duwamish	51%	65%	65%
(8) Southeast Seattle	38%	31%	31%

Source: Fehr & Peers, 2025.

The number of daily person trips was also calculated for the Revised Proposal and is expected to result in slightly fewer trips (less than 1% change) than the FEIS Preferred Alternative. The relative mode shares citywide are consistent between the two alternatives demonstrating very similar travel behavior.

Transit

The transit ridership estimates from the SoundCast model were reviewed for the busiest transit routes and the results are not materially different from the FEIS Preferred Alternative. The ridership on some routes decreased slightly, consistent with other metrics showing lower overall trip activity. For this reason, the Revised Proposal is still expected to show load factors greater than 1.0 for several routes, but the same or fewer impacts compared with the FEIS Preferred Alternative.

Corridor Travel Time

The travel time estimates from the SoundCast model were reviewed and the results are not materially different from the FEIS Preferred Alternative. The model shows travel time variations of no more than 30 seconds on each study segment with the Revised Proposal. Therefore, the number of impacts is expected to be the same or fewer compared with the FEIS Preferred Alternative.



Screenlines & State Facilities

Similar to the previous metrics, the estimated volume changes with the Revised Proposal are less than 1% different than the FEIS Preferred Alternative for both daily and PM peak hour periods. Changes of this magnitude would not materially change the analysis results for screenlines, or state facilities and the number of impacts is expected to be the same or fewer compared with the FEIS Preferred Alternative.

Other Impacts

The FEIS described qualitative impacts for all action alternatives related to active transportation, freight mobility and access, safety, and ferry service. The changes in land use growth assumptions in the Revised Proposal would not substantially alter the previous findings given how similar the growth patterns are to the FEIS Preferred Alternative. Therefore, the active transportation, freight mobility and access, safety, and ferry service impact findings for the Revised Proposal are the same as described for the FEIS Preferred Alternative.

2.4.3 Summary Comparison to FEIS Results

The potential impacts to Seattle's transportation system under the Revised Proposal were evaluated relative to the impacts identified for the FEIS Preferred Alternative. The magnitude of change between these two alternatives across multiple metrics was calculated to be less than 1%. Given the similarity, the potential impacts of the Revised Proposal is likely to be materially similar in number and magnitude compared with the FEIS Preferred Alternative.

2.5 Public Services

2.5.1 Background

Context

This section evaluates impacts to public services—including, police, fire, schools, and parks—under the Revised Proposal. Both the FEIS Preferred Alternative and Revised Proposal assume citywide growth of 120,000 housing units, or approximately 246,000 new residents, and 158,000 jobs by 2044 with some minor changes to the distribution of growth by analysis areas. Growth is expected to occur incrementally under both alternatives.

Thresholds of Significance

The FEIS identified the following thresholds of significance for evaluating impacts of the alternatives:

- Result in insufficient parks, open space, and trail capacity to serve expected population based on existing levels of service.
- Create inconsistencies with shoreline public access policies.
- Result in increases in public school enrollment that cannot be accommodated through regular school planning processes.
- Increase demand for police or fire and emergency that can't be accommodated through regular planning and staffing processes.
- Result in insufficient capacity to handle solid waste under current Seattle Public Facility plans.

Potential impacts of the Revised Proposal are also evaluated in terms of these thresholds of significance.

2.5.2 Analysis

Police

Under both the FEIS Preferred Alternative and Revised Proposal, the increase in population and jobs would result in a corresponding increase in demand for police services. Growth under the Revised Proposal would result in a need for slightly more officers in Area 1 and slightly less officers in Areas 2, 3, 5, and 6 over time, consistent with the differences in expected growth. See [Exhibit 2-19](#).

Exhibit 2-19. Estimate of Officer FTEs per 1000 Residents at Avg. LOS 2010-2022

Alternative	Area 1	Area 2	Area 3	Area 4*	Area 5	Area 6	Area 7*	Area 8	Total
2022 (est.)	219.0	177.7	100.5	143.3	193.1	128.0	6.3	109.3	1,077.0
FEIS Preferred	310.0	261.1	132.3	211.1	255.6	173.2	12.0	147.2	1,502.6
Revised Proposal	312.2	260.3	131.9	211.1	254.9	173.0	12.0	147.2	1502.6

*Area 7 is predominantly industrial and will be regardless of alternative growth strategy.

Note: The level of service calculation is based on Seattle Police Department’s average level of service from 2010-2022 which is 1.73 officers per 1,000 residents.

Sources: Washington Association of Sheriffs and Police Chiefs, 2023; BERK, 2025.

Fire/Emergency Medical Services

Growth in worker and residential populations in the city is expected to lead to an increased number of calls for aid, basic and advanced life support, and other emergency services over time under the Preferred Alternative and Revised Proposal. Based on growth projections of housing units, conversations with SFD staff on current deficits, and the minimum number of apparatuses to maintain a service level close to the current ratios of fire units to housing units, the resulting fire units needed are presented, and rounded to the higher whole number in [Exhibit 2-20](#).

Exhibit 2-20. Apparatus Need by Area—FEIS Preferred Alternative vs. Revised Proposal

Units	Current Housing Unit per Fire Units	Housing Unit per Fire Unit with Growth Alternative (current app. Inventory)	Area: Fire Units Needed Based on Study Area Growth Estimates and Existing Deficiencies (Rounded)								Total Additional Fire Units Needed (Rounded)	Projected Housing Units per Fire Unit if adopted	
			1	2	3	4*	5	6	7*	8			
PA*	Engine	12,231	15,981	2	1	1	1	1	1	1	1	9	12,473
	Ladder	32,616	42,616	0	0	1	0	1	0	1	1	2	36,528
	Medic	43,488	56,822	1	0	1	1	0	1	0	0	3	42,616
	Aid	55,913	73,056	1	1	1	0	1	1	0	1	6	39,338
	Other	19,570	25,570	1	1	0	0	0	1	1	0	4	21,308
RP*	Engine	12,231	15,981	2	1	1	1	1	1	1	1	9	12,473
	Ladder	32,616	42,616	0	0	1	0	1	0	1	1	2	31,962
	Medic	43,488	56,822	1	0	1	1	0	1	0	0	3	39,338
	Aid	55,913	73,056	1	1	1	0	1	1	0	1	6	39,338
	Other	19,570	25,570	1	1	0	0	0	1	1	0	4	21,308
Fire unit increase based on LOS Calculation			Fire unit recommendations have been lowered slightly from LOS calculation to reflect needs based on minimum service provision rather than calculated current service provision					Fire unit recommendations have been raised slightly from LOS calculation to reflect needs based on minimum service provision rather than calculated current service provision					

*PA = Preferred Alternative; RP = Revised Proposal.

*Area 4 recommendations are based on current LOS deficit. Area 7 only partially uses housing data to support additional fire unit recommendations as the current ratio is based on very few housing units and maintaining the current ratio is far beyond LOS standards.

Sources: Seattle Fire Department Annual Report, 2022; BERK, 2025.

Additional units would need to be added to meet the current effective levels of service under either alternative. As discussed in the FEIS, citywide unit additions should reflect aid unit prioritization over other fire units, and each subarea or battalion should have at least a single aid unit stationed at a centrally located station to limit fire unit dispatches on aid calls. Similar to the FEIS Preferred Alternative, additional stations could be added under the Revised Proposal to fill holes in service near Area 1 or 2, the I-5 corridor, or North Seattle, as well as in Area 5 near South Lake Union. Extra units may also be leveraged in Area 8 to support the larger geographic area whose growth may be achieved through smaller multifamily dwellings that are exempt from certain fire suppression measures.

Impacts to fire service from building heights, densities, hazardous materials, construction, and traffic volumes would be the same under the Revised Proposal as the FEIS Preferred Alternative.

Parks

Demand for additional parkland under the Revised Proposal would be the same citywide as the FEIS Preferred Alternative. See [Exhibit 2-21](#). Demand may be slightly higher in Area 1 and slightly lower in Areas 2, 3, 5, and 6 consistent with the differences in expected household growth.

Exhibit 2-21. Acres per 1,000 Population if Park Inventory Does Not Increase

	FEIS Preferred (2044)	Revised Proposal (2044)
Population	1,048,344	1,048,344
Rate: Acres per 1,000 population	6.18	6.18

Note: Adds potential population of 2.05 persons per household within new housing units to an estimated 2024 base population of 802,358 accounting for housing under construction or permitted.

*The acres of parks increased between 2017 and 2024 from 6,414 to 6,478. The 2024 estimate is used in this table. Sources: OFM, 2022; Seattle Parks and Recreation, 2017; BERK, 2025.

The FEIS Preferred Alternative and the Revised Proposal both put greater demand on the parks systems to meet the minimum level of service standard which is defined in the FEIS as “parks and park facilities within 10-minute walk of all residents... Within regional and urban centers, the city aims to provide parks and park facilities within a 5-minute walk of residents.”

Under the Preferred Alternative and Revised Proposal, the projected populations in both regional and urban centers are the same in all eight study areas. This means the Revised Proposal would require a similar distribution of park investments within 10-minute walksheds of residents (minimum in all areas of the city) and 5-minute walkshed (minimum in regional and urban centers) with some minor differences within the analysis areas based on slightly revised boundaries of the Greenwood Urban Center (Area 1), Pinehurst-Haller Lake Urban Center (Area 2), Uptown Regional Center and Queen Anne Urban Center (Area 3), and Admiral and Morgan Junction Urban Centers (Area 6).



Schools

Demand for schools under the Revised Proposal would be the same citywide as the FEIS Preferred Alternative, including an expected increase of 16,132 students and need for 645 new elementary classrooms (assuming 25 students per classroom). See [Exhibit 2-22](#).

Exhibit 2-22. Housing, Population, and Potential Public-School Students Assuming Current Student Percentage

Alternative	Net Change in Housing	Net Change In Population	Student Generation	Equivalent Elementary Classrooms
FEIS Preferred	120,000	246,000	16,132	645
Revised Proposal	120,000	246,000	16,132	645

Note: Converts housing units to population using 2.05 persons per household consistent with regional housing target efforts; assumes 25 students per classroom.

Sources: City of Seattle, 2024; SPS, 2021; SPS 2023; BERK, 2025.

While K-12 public school enrollment has declined over the last 5 years, and is projected to continue declining through 2033, future population growth through 2044 has the potential to increase student enrollment in various areas throughout the city. Most population growth, and therefore students, is expected in Areas 1 and 2 under both the FEIS Preferred Alternative and under the Revised Proposal. Expected differences in student growth are minimal under the Revised Proposal as compared to the FEIS Preferred Alternative—an additional 50 students are expected in Areas 1 and 2 combined, 25 fewer students are expected in Areas 3 and 5 combined, 5 fewer students are expected in Areas 6, 7, and 8 combined, and the same number of students are expected in Area 4 under the Revised Proposal. See [Exhibit 2-23](#). All place types—centers, corridors, and residential districts would see growth and require increased educational services. Within the analysis areas, most growth would be directed to centers and villages under both alternatives and schools in those areas would be most affected.

Exhibit 2-23. Share of Students by Area: North, Central, and West/South Seattle Assuming Current Student Percentage

Alternative	Areas 1-2	Students (Net)	Area 4	Students (Net)	Areas 3 & 5	Students (Net)	Areas 6-8	Students (Net)	Total Students (Net)
FEIS Preferred	41%	6,612	16%	2,571	22%	3,578	21%	3,371	16,132
Revised Proposal	41%	6,662	16%	2,571	22%	3,533	21%	3,366	16,132

Source: BERK, 2025.

Solid Waste

Expected growth in residential, commercial, and self-haul solid waste under the Revised Proposal would be the same citywide as the FEIS Preferred Alternative. See [Exhibit 2-24](#). Like

other public services, demand for solid waste services under the Revised Proposal may be slightly higher in Area 1 and slightly lower in Areas 2, 3, 5, and 6 consistent with the differences in expected growth.

Exhibit 2-24. Estimated Tons of Solid Waste (Garbage, Recycling, Compost) Generated by Alternative—Residential

Scenario	Resident estimates	Tons of Waste Per year estimate	Tons of Diversion at goal rate: 70%
Current: 2020	762,148	315,739	221,017
FEIS Preferred	1,048,344	434,308	304,015
Revised Proposal	1,048,344	434,308	304,015

Sources: SPU, 2020 Annual Waste Prevention & Recycling Report; BERK, 2025.

2.5.3 Summary Comparison to FEIS Results

Police

There would be an increase in population and jobs and an increase in demand for police services under both alternatives. The mitigation measures listed in the FEIS and this analysis require that the City of Seattle invest in resources to address needs and provide adequate services. Needed investments under the Revised Proposal are very similar to the FEIS Preferred Alternative with a slight redistribution of FTEs by analysis area.

Fire/Emergency Medical Services

Increased demand for fire/emergency medical services under the Revised Proposal would be similar to the FEIS Preferred Alternative and can be accommodated by changes in staffing for fire prevention education, increased capacity at station facilities, and either redistributing or increasing the number of units at each station. No additional adverse impacts are expected under the Revised Proposal and future investments needed would be the same as the FEIS Preferred Alternative in order to continue meeting level of service standards.

Parks

Growth under both the FEIS Preferred Alternative and the Revised Proposal would exceed the previously established level of service (population and acres based) and the recently updated level of service standard (population within walking distance). This means increased demand for park and recreation facilities generally and parks within 10-minute walk to all residents of Seattle more specifically.

As the citywide population projections are consistent between the Preferred Alternative and Revised Proposal, the existing and projected deficit in park acres is consistent as well.



Additionally, because regional and urban center population projections are the same, the Revised Proposal would require a similar distribution of parks with 5- and 10-minute walksheds as the Preferred Alternative with some minor differences within the analysis areas based on slightly revised center boundaries.

With mitigation (adding parks, making better use of existing parks, or implementing the updated parks LOS), significant adverse impacts based on the previously established LOS (8 acres per 1,000 residents city-wide) can be avoided. In addition, mitigating any existing or future geographical inequities in parks and recreation service provision would avoid adverse impacts and parks deficiencies based on the 2024 Parks and Recreation Plan LOS. Geographic inequities would continue to be managed and mitigated as needed by Seattle Parks and Recreation over the planning period.

Schools

Growth under both the FEIS Preferred Alternative and the Revised Proposal would result in increases in student population and require investment in facilities to maintain current service levels. Strategies to increase existing school capacity are not currently accounted for in current district plans but Seattle Public Schools could respond to any new growth that may occur through regular capital planning and coordination. Like the FEIS Preferred Alternative, existing schools may need added classrooms, schools, or attendance boundary changes depending on the actual rate of growth under the Revised Proposal.

Solid Waste

Expected growth in residential, commercial, and self-haul solid waste under the Revised Proposal would be the same citywide as the FEIS Preferred Alternative. Under both the Preferred Alternative and the Revised Proposal, Seattle Solid Waste expects to accommodate expected increases in solid waste service through regular contract renegotiation and ongoing maintenance and upkeep of capital facilities.

2.6 Cultural Resources

2.6.1 Background

Context

This section evaluates the Revised Proposal as it relates to impacts to cultural resources. This section also discusses the City’s proposed legislation to update the SEPA environmental review thresholds based on additional Executive proposals to respond to State SEPA exemption laws and rules. The proposed SEPA exemption legislation is planned to follow adoption of the Comprehensive Plan update, likely in 2026. For additional context, please see the One Seattle Plan FEIS, Section 3.9 Cultural Resources and Appendix C, which identified the City’s intent to provide for an infill and residential exemption under RCW 43.21C.229 and WAC 197-11-800(1)(c).

Cultural resources include historic-period architectural resources, and precontact and historic-period archaeological resources. In the FEIS Section 3.9, analysis determined the distribution of known cultural resources citywide as of 2024. Below is a summary of known cultural resources within each of the nine designated areas,¹ followed by an analysis of potential changes to SEPA thresholds.

Area 1—NW Seattle

The NW Seattle area contains 3 NRHP-listed historic districts, 14 individually listed resources, 2 WHR-listed resources, 32 SL-designated resources, and 34,045 historic-period buildings and structures, 59 of which have been determined eligible for listing in the NRHP. Survey has also identified numerous areas significant for their association with specific cultural groups, including 1 Black historic site, 2 potential Black commemorative sites, and 1 Hispanic historic site (Culturally Important Resources [CIRs]) within the NW Seattle area. Due to the area’s concentration of historic-period BSOs—many of which have yet to be surveyed and evaluated for eligibility—it is plausible that many more could potentially be determined eligible for listing in the NRHP and local registers, and additional CIRs. In the NW Seattle area, 8 known archaeological sites have been previously recorded; however, due to the area’s mix of Moderate to Very High Risk for archaeological and cultural resources, many more as yet unknown sites could be present.

¹ Sources for these data include the City of Seattle Landmarks List, City of Seattle Landmarks Districts, King County Assessor’s website, Washington Department of Archaeology and Historic Preservation (DAHP) WISAARD database, Black Historic Sites Survey website, and the Latino Heritage Survey Sites.

Acronym Definitions

BSO—Buildings, Structures, Objects

DAHP—Washington Department of Archaeology and Historic Preservation

GLO—General Land Office

HPI—Historic Property Inventory forms

NHL—National Historic Landmark (the Nation’s highest level of significance)

NRHP—National Register of Historic Places

SL—Seattle Landmarks

TCP—Traditional Cultural Properties

WHBR—Washington Heritage Barn Register

WHR—Washington Heritage Register

WISAARD—Washington Information System for Architectural and Archaeological Records database

Area 2—NE Seattle

The NE Seattle area contains 3 NRHP-listed historic districts, 18 individually listed resources, 9 WHR-listed resources, 39 SL-designated resources, and 28,352 historic-period buildings and structures, 140 of which have been determined eligible for listing in the NRHP. Survey has also identified 2 Hispanic historic sites within the NE Seattle area. Due to the area’s concentration of historic-period BSOs—many of which have yet to be surveyed and evaluated for eligibility—it is plausible that many more could be determined eligible for listing in the NRHP and local registers, and additional CIRs as the result of future surveys. In the NE Seattle area, 10 archaeological sites have been previously recorded; however, due to the area’s mix of Moderate to Very High Risk for archaeological and cultural resources, many more as yet unknown sites could be present.

130th/145th Station Area: While there are no NRHP- or WHR-listed historic districts or individually listed resources found within the 130th/145th Station Area, there are 3 SL-designated resources. Within the station area there are 5,260 historic-period buildings and structures, 2 of which have been determined eligible for listing in the NRHP. Due to the area’s concentration of historic-period BSOs—most of which have yet to be surveyed and evaluated for eligibility—it is plausible that many more could be determined eligible for listing in the NRHP and local registers as the result of future surveys. In the 130th/145th station area, 1 archaeological site has been previously recorded. However, due to the area’s Moderate to Very High Risk for archaeological and cultural resources, many more as yet unknown sites could be present.

Area 3—Queen Anne/Magnolia

The Queen Anne/Magnolia area contains 3 NRHP-listed historic districts, 19 individually listed resources, 4 WHR-listed resources, 59 SL-designated resources, and 12,546 historic-period buildings and structures, 120 of which have been determined eligible for listing in the NRHP. Survey has identified 1 Black Historic Site and 1 Potential Black Commemorative Site within the Queen Anne/Magnolia area. Due to the area’s concentration of historic-period BSOs—many of which have yet to be surveyed—it is plausible that many more could be determined eligible for listing in the NRHP and local registers, and additional CIRs as the result of future surveys. In the Queen Anne/Magnolia area 14 archaeological sites have been previously recorded; however, due to the area’s Very High Risk for archaeological and cultural resources, many more as yet unknown sites could be present.

Area 4—Downtown/Lake Union

Found within the Downtown/Lake Union area are 6 NHLs, 3 NRHP-listed historic districts, 80 individually listed resources, 1 WHR-listed historic district, 20 individually listed WHR resources, 155 SL-designated resources, and 1,711 historic-period buildings and structures, 278 of which have been determined eligible for listing in the NRHP. Survey has identified 1 Black Historic Site and 1 Potential Black Commemorative Site within the Downtown/Lake Union area. Due to the area’s concentration of historic-period BSOs—many of which have yet to be surveyed—it is plausible that many more could be determined eligible for listing in the

NRHP and local registers, and additional CIRs as the result of future surveys. In the Downtown/Lake Union area 1 historic archaeological site was listed in the NRHP and WHR and 35 historic-period sites have been previously recorded. Of these, 2 have been determined eligible for the NRHP. Due to the area's Very High Risk for archaeological and cultural resources, many more as yet unknown sites could be present.

Area 5—Capitol Hill/Central District

The Capitol Hill/Central District area contains 7 NRHP-listed historic districts, 46 individually listed resources, 7 WHR-listed resources, 117 SL-designated resources, and 14,100 historic-period buildings and structures, 399 of which have been determined eligible for listing in the NRHP. Survey has identified 25 Black Historic Sites, 16 Potential Black Commemorative Sites, and 3 Hispanic Historic Sites within the Capitol Hill/Central District area. Due to the area's concentration of historic-period BSOs—many of which have yet to be surveyed—it is plausible that many more could be determined eligible for listing in the NRHP and local registers, and additional CIRs as the result of future surveys. In the Capitol Hill/Central District area, 14 archaeological sites have been previously recorded, with 1 determined eligible for listing in the NRHP. However, due to the area's Moderate to Very High Risk for archaeological and cultural resources, many more as yet unknown sites could be present.

Area 6—West Seattle

The West Seattle area contains 4 individually NRHP-listed resources, 1 WHR-listed resource, 24 SL-designated resources, and 22,764 historic-period buildings and structures, 48 of which have been determined eligible for listing in the NRHP. Survey has identified 2 Potential Black Commemorative Sites and 3 Hispanic Historic Sites in the West Seattle Area. Due to the area's concentration of historic-period BSOs—many of which have yet to be surveyed—it is plausible that many more could be determined eligible for listing in the NRHP and local registers, and additional CIRs as the result of future surveys. In the West Seattle area, 8 archaeological sites have been previously recorded, with none yet determined eligible for listing in the NRHP. However, due to the area's High to Very High Risk for archaeological and cultural resources, many more as yet unknown sites could be present.

Area 7—Duwamish

Found within the Duwamish area is 1 NHL, 1 NRHP-listed historic district, 5 individually listed resources, 4 WHR-listed resources, 14 SL-designated resources, and 2,115 historic-period buildings and structures, 84 of which have been determined eligible for listing in the NRHP. Survey has identified 1 Potential Black Commemorative Site and 6 Hispanic Historic Sites in the Duwamish area. Due to the area's concentration of historic-period BSOs—many of which have yet to be surveyed—it is plausible that many more could be determined eligible for listing in the NRHP and local registers, and additional CIRs as the result of future surveys. In the Duwamish area, 38 archaeological sites have been previously recorded, with 1 precontact site

listed in the NRHP and 1 precontact site determined eligible for listing in the NRHP. However, due to the area's Very High Risk for archaeological and cultural resources, many more as yet unknown sites could be present.

Area 8—SE Seattle

Found within the SE Seattle area are 4 NRHP-listed historic districts, 14 individually listed resources, 1 WHR-listed resource, 34 SL-designated resources, and 19,734 historic-period buildings and structures, 80 of which have been determined eligible for listing in the NRHP. Survey has identified 3 Black Historic Sites, 8 Potential Black Commemorative Sites, and 3 Hispanic Historic Sites in SE Seattle area. Due to the area's concentration of historic-period BSOs—many of which have yet to be surveyed—it is plausible that many more could be determined eligible for listing in the NRHP and local registers, and additional CIRs as the result of future surveys. In the SE Seattle area, 7 archaeological sites have been previously recorded, with none determined eligible for listing in the NRHP. However, due to the area's Moderate to Very High Risk for archaeological and cultural resources, many more as yet unknown sites could be present.

Thresholds of Significance

This section includes an analysis, like that in the FEIS, comparing the impacts to cultural resources of the Revised Proposal to the FEIS Preferred Alternative plan. Cultural resources include historic-period architectural resources, and precontact and historic-period archaeological resources. Impacts to cultural resources are considered significant if they result in:

- Substantial changes to or alteration of features or characteristics, or loss (removal or demolition) of a cultural resource that prevent their eligibility for inclusion as a designated Seattle Landmark (SL), or inclusion in the National Register of Historic Places (NRHP), National Historic Landmark (NHL) program, or the Washington Heritage Register (WHR).
- More than a moderate adverse impact (potential loss of or alterations to the physical evidence or tangible evidence of cultural history) to Culturally Important Resources (CIR), which for the purposes of this EIS are important to certain cultural groups or communities, whether or not they are listed or eligible for the SL, NRHP, or WHR.
- Resources that have been officially determined not eligible for these registers or are considered CIRs will not be adversely impacted by the proposed Alternatives.

2.6.2 Analysis

Projects Subject to SEPA Review

Currently, Washington State Environmental Policy Act (SEPA) allows some projects to be exempt from SEPA review. SEPA exemptions vary by location, zone, and use. In Seattle, SEPA review considers impacts from alterations to Seattle Landmarks (project must be reviewed and

a Certificate of Approval issued by the Department of Neighborhoods [DON]/SL District Board) and impacts from projects adjacent to SLs (or across the street). Projects, if they would not be subject to other retained low demolition-related thresholds or a referral agreement between SDCI and DON, would not be subject to the same review of potential impacts to cultural resources and could therefore result in impacts that are never fully considered. See discussion below for more information. (Seattle Department of Construction and Inspections [SDCI] 2022, 2025; Seattle Department of Neighborhoods 2015).

Senate Bill 5412, which was enacted in 2023, and which amended RCW 43.21c.229, allows cities and counties to create their own exemptions from the SEPA in order to streamline the review of certain housing projects as identified in FEIS Appendix C. Per RCW 43.21c.229(4), residential housing or middle housing units were exempt in Seattle until September 30, 2025. WAC 197-11-800(1)(c) also allows flexible thresholds. Given the expiration of the blanket exemption in 43.21c.229(4) and opportunities for flexible thresholds for residential and non-residential uses in WAC 197-11-800(1)(c), the City is developing permanent code and rules regarding SEPA exemptions. The Seattle Department of Construction and Inspections (SDCI) Director's SEPA Thresholds Update legislation updates the City's environmental review process by significantly expanding categorical exemptions for new development. The proposal would exempt most new residential and mixed-use projects from SEPA review until citywide growth targets are reached; raise SEPA thresholds for non-residential projects to the state maximum levels; and maintain targeted review requirements (such as archaeological protections) through non-SEPA regulatory tools, as described below. The proposed SEPA Thresholds Update was based on the FEIS findings and are intended to focus infill development in Centers, in support of the regional growth strategy.

The proposed SEPA Thresholds Update legislation maintains environmental protections through the City's existing development codes and complementary regulatory tools. These include non-SEPA transportation impact analyses for mid-size projects, continued Transportation and Construction Management Plans, and updated protections for archaeological and cultural resources. Also, situations where an otherwise SEPA-exempted development is still subject to other discretionary land use permit reviews would continue to be covered by other existing referral practices (per an Interdepartmental Agreement) by which SDCI may seek DON's evaluation of whether an affected site or building should be referred for Landmark consideration. Finally, review of possible demolitions would continue to be covered by thresholds for referrals to DON – not proposed to be changed – that are included in the City's SEPA categorical exemption code at Section 25.05.800.B.6 and B.7. By retaining these existing protections and also shifting certain environmental oversight from project-by-project SEPA review to comprehensive, code-based regulation, the proposal attempts to streamline permitting, reduce housing development delays, and align with state housing and climate goals, while preserving key environmental safeguards, potential historic building referral practices at current levels, and interagency coordination.

Proposed citywide SEPA exemptions for residential and mixed-use development would include the following provisions:

- SEPA review (unless otherwise required due to a site’s or development proposal’s characteristics) would no longer apply to any residential or mixed-use project (citywide) until the City’s growth target of 120,000 new dwelling units is reached.
- Once that citywide dwelling unit target is met, fallback thresholds would take effect:
 - Up to 200 dwelling units (maximum allowed by WAC 197-11-800) citywide.
- This effectively makes SEPA review for residential projects likely to be rare (similar to direction in RCW 43.21c.229(4)).

Proposed citywide SEPA exemptions for non-residential development:

- Non-residential development would be exempt up to:
 - 30,000 sq. ft. for retail uses, and
 - 65,000 sq. ft. for other commercial or institutional uses.
- These levels are authorized under RCW 43.21C.229 for infill development and WAC 197-11-800 in urban growth areas.
- If citywide non-residential growth goals are met, fallback thresholds would revert to 30,000 sq. ft. for all non-residential uses.

SEPA review would still apply in limited circumstances such as:

- A site includes streams, wetlands, or other environmentally critical areas.
- A proposal is over water.
- An expansion of an existing use crosses a SEPA threshold for the first time.

The proposed SEPA Thresholds Update legislation and rules provide for a more streamlined, accelerated development environment with fewer discretionary reviews matching the intent of the legislation. The proposal narrows the scope by listing the circumstances in which SEPA would still apply—environmentally critical areas, over-water development, and expansions that newly exceed SEPA thresholds—clarifying that certain site-specific environmental protections remain in place outside the general exemption framework.

By increasing the SEPA thresholds for residential, mixed-use, and non-residential developments, more projects would be exempt from SEPA review. This would reduce at least some of the procedural reviews that typically allow flagging of projects with potential impacts to historic resources.

Seattle code already protects some historic-period architectural resources through the Landmarks Preservation Ordinance (Chapter 25.12) and historic districts provisions. Projects affecting designated landmarks or contributing structures within historic districts are subject to review by the Department of Neighborhoods and must meet design standards consistent with the Secretary of the Interior’s Standards for Rehabilitation. However, for most future developments that are not within and do not abut landmarked or districted properties, SEPA would often no longer apply. Project proponents would often not be required to identify previously undocumented cultural resources within their project areas or assess their projects for impacts to previously undocumented historic properties, unless triggered by exceptional

criteria (e.g., proximity to a known archaeological site or shoreline area), or otherwise subject to landmark referrals based on retaining existing City practices defined in Section 25.05.800.B6 and .B7, and an SDCI-DON interdepartmental agreement. The SDCI-DON interdepartmental agreement coordinates the review of development projects that may affect historic buildings or sites, to ensure early identification of potential SLs. The agreement specifies processes for consultation with DON when a resource's potential historic status is uncertain, and larger projects are automatically referred to DON for review.

As identified in the FEIS for the Preferred Alternative, higher SEPA thresholds would remove some proactive, project-level environmental review designed to identify previously undocumented historic properties and to potentially require measures to avoid or mitigate adverse impacts to them before development begins. Reduced SEPA review could lead to adverse impacts to previously undocumented cultural resources, especially outside of landmarked areas or documented shoreline buffers. For archaeological sites not already mapped or anticipated, and for buildings, structures, and objects that have not yet been surveyed or evaluated, early identification, impact avoidance, and mitigation may be limited. Raising SEPA thresholds in this way represents at least a partial shift from a preventive review model to a reactive mitigation model and could increase impacts to cultural resources, such as undocumented historic or cultural resources, as is similar to the FEIS evaluation of all alternatives including the Preferred Alternative. The reduced potential for demolition in the Neighborhood Residential area under the Revised Proposal evaluated in this Addendum could slightly reduce impacts to undocumented resources in those areas.

SDCI Director's Rule 2-98

Specifically for archaeological resources, the SEPA Thresholds Update legislation would also revise SDCI Director's Rule 2-98, implemented in 1998. The proposed revisions expand the scope, modernize terminology, and integrate other regulatory frameworks (e.g., the Shoreline Master Program) into Director's Rule 2-98. The revisions to Rule 2-98 and related code language improve consistency with state and federal archaeological protection laws, expanding protections to include grading permits within 200 feet of historic or former shorelines (based on U.S. Government meander lines) to ensure broader coverage, and mandates tribal engagement and notification, thus fulfilling mitigation measures that were recommended in the FEIS.

The updates to SDCI Director's Rule 2-98, could strengthen protection and management of archaeological resources by expanding when and how the City identifies, evaluates, and mitigates impacts. The updates could lead to earlier identification of archaeological resources within designated buffers before ground disturbing construction activities begin and increase the probability of avoidance by allowing projects to be redesigned or relocated to avoid the resources. The rule change requires Tribal consultation and the consideration of broader cultural perspectives and proposed inadvertent discovery procedures are clear. However, under the proposed raised SEPA thresholds, it is possible that additional survey and inventory may not be required and project proponents may not identify previously unrecorded

archaeological resources prior to ground disturbance. Also, archaeological resources not within the Shoreline District or the 200ft meander buffer, such as those located farther inland yet still within areas with a High or Very High Risk of archaeological resources (as shown on DAHP's predictive model), are not covered by these rule changes and may be impacted. Such impacts are similar to the impacts discussed in the FEIS Preferred Alternative.

2.6.3 Summary Comparison to FEIS Results

The FEIS Preferred Alternative could allow a large increase in the supply and diversity of housing throughout the city, supporting up to 40,000 additional residences compared to the FEIS No Action Alternative. The FEIS Preferred Alternative would expand boundaries at new light rail stations, such as Squire Park, and in other small centers, and would expand the boundaries of the city's existing regional centers such as First Hill/Capitol Hill Regional Center and 23rd & Union–Jackson Urban Center, and urban centers, such as Admiral, Greenwood–Phinney Ridge, Morgan Junction, and Upper Queen Anne. The FEIS Preferred Alternative would create 5 new neighborhood centers including North Magnolia, High Point, Mid Beacon Hill, Upper Fremont, and Hillman City. Additionally, South Park would be redesignated as a neighborhood center. Urban Neighborhoods, a new place type, would include a mix of low- to moderate-density housing and commercial development along arterials with access to transit. Existing regional centers and urban centers would gain up to 80,000 housing units, while other areas would see up to 40,000 additional housing units in new housing types. Additionally, the distribution of jobs and commercial space may shift toward transit corridors to correspond with the location of housing growth. Similar to the FEIS Preferred Alternative, the Revised Proposal proposes an increase in housing supply and diversity of housing types through all neighborhoods citywide.

The FEIS Preferred Alternative's land-use concepts could incentivize development with increased floor area and building heights, allowing for the construction of dense, multi-story buildings. Most residential growth under the FEIS Preferred Alternative would be in regional centers, urban centers, and neighborhood centers, with most growth located in North Seattle in Areas 1 (NW Seattle) and 2 (NE Seattle), followed by Area 4 (Downtown/South Lake Union), and then Area 5 (Capitol Hill/Central District). Similar to the FEIS Preferred Alternative, the Revised Proposal proposes increasing building heights in neighborhood centers near major transit stops or near existing concentrations of goods and services by revising center boundaries.

In the 130th/145th Station Area, the FEIS Preferred Alternative would create an urban center called Pinehurst-Haller Lake along both sides of I-5 at the NE 130th Street Light Rail Station area. The 145th Station Area would not be designated as a center and would receive less housing and job growth. Under the FEIS Preferred Alternative, development would be dense, with the greatest increase in housing and job growth in the 130th Station Area urban area. Similar to the FEIS Preferred Alternative, the Revised Proposal proposes increasing building heights in the new neighborhood and urban centers, including the Pinehurst-Haller Lake Urban Center, near major transit stops and near existing concentrations of goods and services.

As described and mapped in the FEIS Affected Environment, growth will likely occur in areas that contain or abut listed historic properties or recorded archaeological resources or contain mapped resources sensitivity areas. Development projects under the FEIS Preferred Alternative or the Revised Proposal could affect cultural resources. Impacts to cultural resources could occur as a result of alteration, demolition, damage, or destruction. In addition, development under both the FEIS Preferred Alternative or the Revised Proposal could increase the probability of inadvertent discovery of below ground archaeological and cultural resources because of substantial foundation work needed for multi-story buildings. Additionally, some allowed adaptive reuse projects in the worst case could impact historic-period architectural resources by allowing for inappropriate alterations, changes, additions, and loss of character-defining features and historic building materials that could diminish the building's ability to qualify as a designated SL or for listing in the NRHP.

Both the FEIS Preferred Alternative plan and the Revised Proposal have the potential to affect districts, sites, landscapes, or BSOs that have been designated as SLs or listed in the NRHP and WHR, and those resources that have been determined eligible for listing in the NRHP. Additionally, both could potentially affect the numerous BSOs and unidentified archaeological sites that have yet to be surveyed and assessed for potential eligibility for listing in city, state, or national registers of historic places.

Potential Impacts on Cultural Resources

Since development may occur in any location citywide under either the FEIS Preferred Alternative or the Revised Proposal, it is possible that cultural resources could be impacted under both plans. Changes to zoning that allow a wider range of residential and/or commercial growth could spur redevelopment. This could occur, for example, where the focused growth within Neighborhood Centers would allow for a wide range of housing types and commercial space and where the broad expansion of housing options would allow for and possibly incentivize increased density on lots throughout the city. Even where there are no formally designated historic properties, there are numerous parcels with historic-period buildings, many of which have never been formally surveyed and evaluated for eligibility but could potentially qualify for designation as an SL or as eligible for listing in the NRHP. Many areas targeted for growth are in areas with High or Very High Risk of archaeological resources. Demolition and construction could require substantial ground disturbance, thus negatively and irreversibly impacting previously unidentified below-ground archaeological resources. Washington Department of Archaeology and Historic Preservation's (DAHP's) archaeological predictive model, used to establish probabilities for precontact cultural resources, depicts much of the land within the city as a High or Very High Risk area, primarily because of proximity to Puget Sound, Salmon Bay, Lake Union, Elliott Bay, and the Duwamish River, and the use-history throughout the precontact and historic periods.

Potential Impacts on Historically Marginalized Groups

Analysis also indicates that both the FEIS Preferred Alternative Plan and the Revised Proposal have the potential to affect historic and cultural resources through development/redevelopment in historically marginalized neighborhoods citywide. With raised SEPA thresholds and possibly fewer opportunities to investigate possible impacts on cultural resources within these areas (depending on whether existing SEPA- or non-SEPA based historic referral practices would be triggered), the character of culturally significant spaces and neighborhoods could be at greater risk.

Mitigation Measures

The FEIS identified potential impacts under all studied alternatives, and the Revised Proposal has similar potential impacts to cultural and historic resources as the Preferred Alternative. The FEIS described mitigating aspects of the proposed One Seattle Plan supportive of cultural and historic resources. It also listed existing federal, state, and local regulations and commitments, and other potential mitigation measures to reduce potential impacts such as through advanced planning. These mitigation measures would apply to the Revised Proposal. Based on the description of city practices in the SDCI Director's Rule, additional descriptions of existing and potential mitigation measures are added to those in Section 3.9.3 of the FEIS.

The following is added to the Regulations and Commitments list:

- Interdepartmental Agreement SDCI to DON: Situations where an otherwise SEPA-exempted development is still subject to other discretionary land use permit reviews would continue to be covered by other existing referral practices (per an Interdepartmental Agreement) by which SDCI may seek DON's evaluation of whether an affected site or building should be referred for Landmark consideration.
- Review of Possible Demolitions: Review of possible demolitions would continue to be covered by thresholds for referrals to DON – not proposed to be changed – that are included in the City's SEPA categorical exemption code at Section 25.05.800.B.6 and B.7.

Other potential mitigation measures that could be added to the list in the FEIS in Section 3.9.3, with respect to archaeological and cultural resources include administrative actions such as:

- Inclusion of inadvertent discovery language on all SDCI Grading plan sheets templates.
- SDCI could develop a data tracking and reporting method allowing Tribes' access to up-to-date permit data for all grading permits issued in the Shoreline or within the government meander line buffer area.

Summary

As compared to the FEIS Preferred Alternative plan, the Revised Proposal proposes the same growth in housing units and jobs, but with modest changes as to their distribution within the proposed amended boundaries of Regional, Neighborhood, and Urban Centers, and with changes to place type designations. As they relate to potential impacts to cultural resources,

both the FEIS Preferred Alternative and the Revised Proposal would allow for a large increase in supply and diversity of housing across the city. Development projects under the FEIS Preferred Alternative or the Revised Proposal could impact cultural resources through alteration, demolition, damage, or destruction, or could increase the probability of inadvertent discovery of below-ground archaeological and cultural resources because of extensive foundation work during the construction of multi-story buildings. While current Washington SEPA allows some projects to be exempt from SEPA review, the proposed SEPA Thresholds Update legislation would be likely to exempt more projects from review (while retaining a degree of oversight by maintaining existing historic referral thresholds for demolition, and the ability to make other historic referrals if a development proposal includes a non-SEPA discretionary land use permit decision), which could increase impacts to cultural resources. The level of impacts from the changes of the Revised Proposal are similar to the level of impacts as noted in the analysis of the FEIS Preferred Alternative.

Due to the concentration of historic-period BSOs across the city—many of which have yet to be surveyed and evaluated for eligibility—it is plausible that many could potentially be determined eligible for listing in the NRHP and local registers, and additional CIRs. If surveying and inventorying would not occur, or if it would be foreclosed by amended SEPA thresholds, impacts to these unsurveyed architectural resources would not be evaluated or mitigated.

Like the FEIS Preferred Alternative, the Revised Proposal has the potential for significant adverse impacts to cultural resources citywide. Such impacts can include physical alteration, damage, or destruction of all or part of a resource; alteration of the characteristics of the surrounding environment that contribute to the property's significance; and the introduction of visual or audible elements that are out of character with the property's surroundings. Such impacts could alter the characteristics of a historic property in such a way as to diminish its integrity, thus affecting its ability to qualify for designation in the SL or listing in the NRHP.

Advanced planning to eliminate, minimize, or avoid impacts to cultural resources would improve outcomes under all the alternatives. If elimination, minimization, or avoidance is impracticable, mitigation is the preferred option. Mitigation plans should be planned and implemented in coordination with the area's Tribes, the lead agency, and all other stakeholders and consulting parties in accordance with DAHP Mitigation Options and Documentation Standards, and the City of Seattle's Historic Preservation policies. The ultimate outcome of such mitigation is to moderate or substantially lessen the adverse impacts to cultural resources before they are lost or significantly altered.

Impacts under the Revised Proposal are similar to the FEIS Preferred Alternative, and will result in no new significant impacts. With the implementation of advanced planning or mitigation measures, significant adverse impacts to cultural resources can be avoided or minimized under either the FEIS Preferred Alternative or the Revised Proposal.

3 APPENDICES

- A Updated Development Prototypes: Neighborhood Residential Zones as Updated by Council
- B Revised Center Boundary Maps
- C Place Type Comparison Tables



A Updated Development Prototypes: Neighborhood Residential Zones as Updated by the Revised Proposal

September 23, 2025

This document outlines likely development prototypes in Neighborhood Residential zones for attached and stacked dwelling units based on the Revised Proposal.

Attached Prototype

	Preferred Alternative	Revised Proposal (Am. 70, 95, & 113)
FAR	1.2	1.6
Setbacks	Generally, 10 ft front & rear; 5 ft side	Same as Mayor’s but less on small lots near frequent transit and more on lots with lower density, for accessory dwelling units, and on Queen Anne Boulevard.
Height	3 stories	
Density	1 unit/1,250 sq ft or up to 6 units near major transit stops	
Lot Coverage	50%	
Amenity Area	20% of lot area	

Source: City of Seattle, 2025.

The increased FAR in the Revised Proposal means that FAR would not be the primary limiting factor in determining the size of units. Instead, lot coverage and parking would tend to be the primary limiting factors. Lot coverage would limit the maximum practical FAR to about 1.4. The effect of parking would be complex and vary by site based on lot size, lot shape, topography, and presence of alleys. Conversations with developers and recent development patterns suggest that most projects would still choose to provide 1:1 parking, but this may not be true in all cases, especially closer to transit. It is likely that projects choosing to provide 1:1 parking would not be able to achieve an FAR of 1.4. Examples in LR2 and LR3 zones suggest there is a practical limit of around 1.3 for these sites.

In theory, the higher FAR could make it easier to add more units on a lot; however, this is unlikely to occur given the small floor plates that would result and the challenges of accommodating more parking.

Overall, these changes are likely to result in slightly larger units and a small increase in the viability of development.

Stacked Flat Prototype

	FEIS Preferred Alternative	Revised Proposal: Updated Base as Amended (Am. 70, 85, & 90)	Revised Proposal: Base plus Green Factor or Tree Retention (Am. 91)	Revised Proposal: Base plus Green Factor & Accessibility Bonus (Am. 79)
FAR	1.4	1.8	2.0	2.0 but accessible units are exempt
Height	3 stories	3 stories	4 stories	4 stories
Density	1 unit/650 sq ft	1 unit/600 sq ft	1 unit/500 sq ft	1 unit/500 sq ft but accessible units are exempt
Lot Coverage	50%	60%	60%	Complex
Parking	1 space/2 units	None	None	None
Setbacks	Generally, 10 ft front & rear; 5 ft side			
Amenity Area	20% of lot area	25% of lot area but balconies count toward area		

Source: City of Seattle, 2025.

Base development standards for stacked flats would be updated and two new bonuses would be provided under the Revised Proposal. The first bonus—Base plus Green Factor or Tree Retention—applies to projects that meet a Green Factor score of 0.6, retain a Tier 1 tree, or retain two Tier 2 trees. Since stacked flat developments in multifamily zones are already meeting Green Factor requirements, it should be assumed that meeting Green Factor requirements is not a major barrier, and new development would generally use this bonus if the additional development capacity is useful.

The second bonus—Base plus Green Factor & Accessibility Bonus—exempts “the square footage of dwelling units that are Type A units” from FAR, density, and lot coverage. Lot coverage is measured for the building as a whole rather than for individual units. Based on past practice, it is assumed that portions of buildings would only be exempted from lot coverage if the units on each floor in that portion of the building are Type A. Consequently, use of the lot coverage exemption would require the construction of elevators. Type A units require wide doorways, hallways, and paths of travel (typically 32”-36” wide), accessible bathrooms including grab bars and roll-in showers, and lower height counters and faucets. Type A units are already required in buildings with 10 or more units and are not dramatically more expensive to build than standard units. Consequently, we should assume that many units located on the first floor would be Type A units if the development capacity is useful.

Development that provides a significant number of Type A units would be practically exempted from FAR and lot coverage. Assuming they didn’t provide parking, the development would be limited only by the height, amenity area, and setbacks.

Overall, these changes could result in buildings that have a larger footprint, a fourth story, and more units compared to the Preferred Alternative/Mayor’s proposal. It is also likely to increase

the viability of this type of development. However, stacked flat development in NR zones would likely still be limited. It is challenging to build stacked flats in a three or four story context given a wide range of state, local, and market factors. It is possible that these changes could make stacked flats viable in some areas. However, it is likely that apartment construction would continue to be focused in areas that are closer to transit, shops, and services and in zones with more development capacity. At a minimum, it is likely that development of stacked flats in most NR zones would be significantly less viable than in LR3, MR, or NC zones due to the lower development capacity and the challenges of selling or renting units without parking that are further from transit, shops, and services.

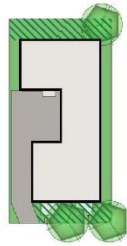
Neighborhood Residential Design Concepts – Updated Prototypes

Neighborhood Residential Design Concepts
Updated Prototypes

**TWO DUPLEXES,
STREET ACCESS PARKING**

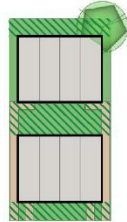
Total units	4
Floor area ratio (FAR)	1.3
Average unit size	1,755
Stories	3
Lot size	5,000
Building coverage	50%
Usable open space*	17%
Building plus paving	83%
Parking spaces	4

*Usable open space requirement is waived if planting or preserving medium or large trees that provide tree canopy over at least 10% (500 square feet) of the lot.



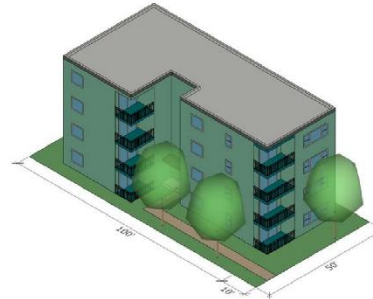
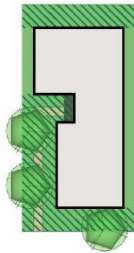
**TWO DUPLEXES,
NO PARKING**

Total units	4
Floor area ratio (FAR)	1.4
Average unit size	1,875
Stories	3
Lot size	5,000
Building coverage	50%
Usable open space	38%
Building plus paving	62%
Parking spaces	0



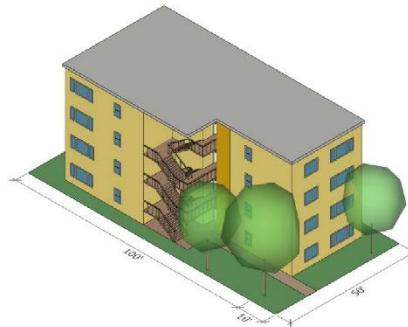
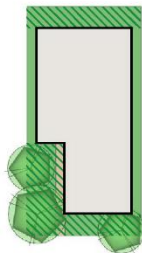
**STACKED FLATS,
NO PARKING**

Total units	8
Floor area ratio (FAR)	2
Average unit size	1,180
Stories	4
Lot size	5,000
Building coverage	52%
Usable open space	37%
Building plus paving	58%
Parking spaces	0



**STACKED FLAT WITH
ACCESSIBILITY BONUS,
NO PARKING**

Total units	12
Floor area ratio (FAR)	2.2
Average unit size	835
Stories	4
Lot size	5,000
Building coverage	56%
Usable open space	30%
Building plus paving	59%
Parking spaces	0



B Revised Center Boundary Maps

Area 1

- Greenwood Urban Center (pre-Council Amendments)
- East Ballard Neighborhood Center (Amendment 42)
- Northwest Green Lake Neighborhood Center (pre-Council Amendments & Amendment 49)
- Upper Fremont Neighborhood Center (Amendment 48)
- Whittier Neighborhood Center (pre-Council Amendments)

Area 2

- Pinehurst-Haller Lake Urban Center (pre-Council Amendments)
- Bryant Neighborhood Center (pre-Council Amendments)
- Ravenna Neighborhood Center (Amendment 40)

Area 3

- Uptown Regional Center and Queen Anne Urban Center (pre-Council Amendments & Amendment 51)
- Magnolia Village Neighborhood Center (pre-Council Amendments & Amendment 44)
- North Magnolia Neighborhood Center (pre-Council Amendments & Amendment 45)

Area 4 (none)

Area 5

- Madison Park Neighborhood Center (pre-Council Amendments)
- Madrona Neighborhood Center (pre-Council Amendments & Amendment 38)
- Montlake Neighborhood Center (pre-Council Amendments)

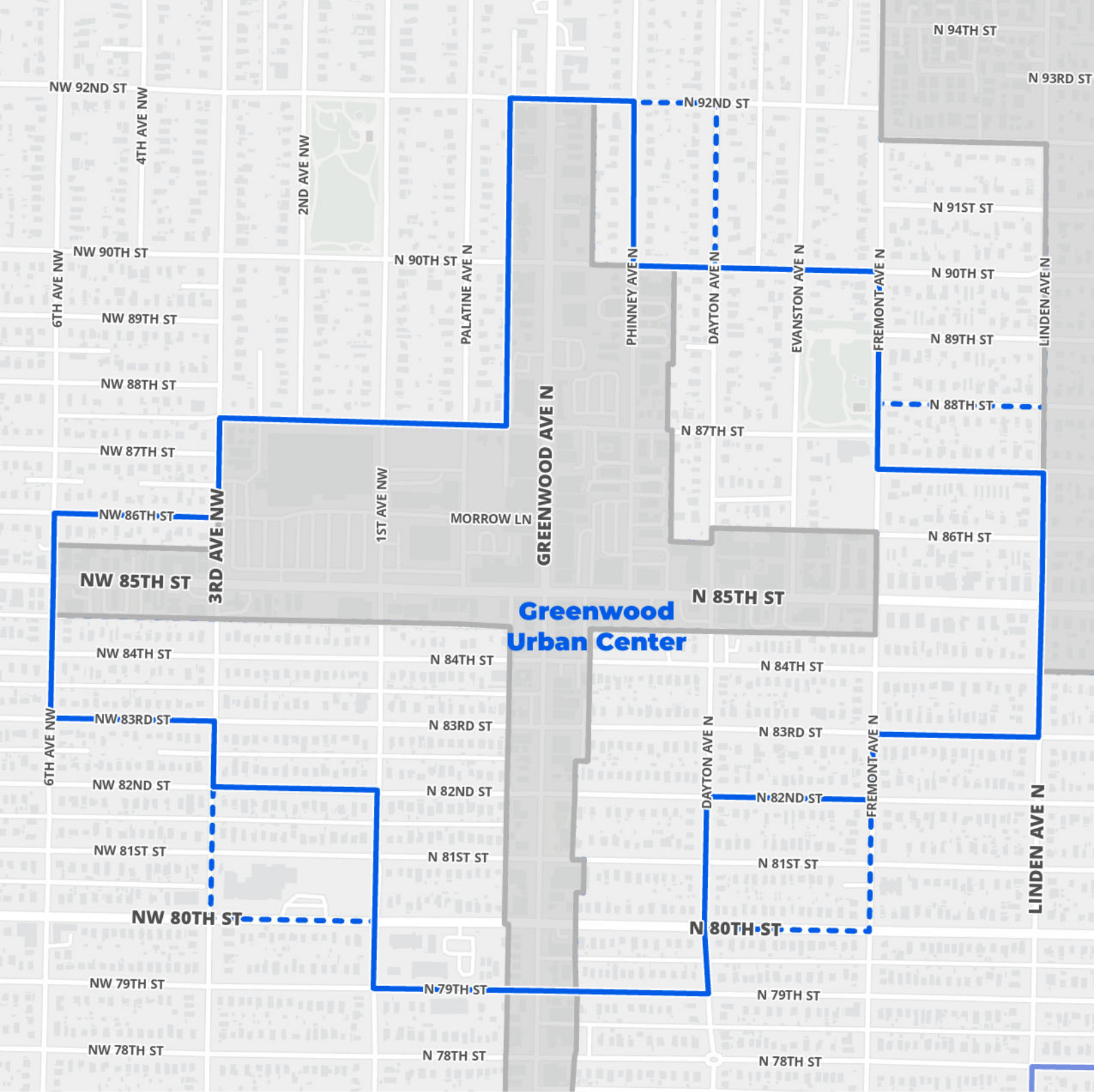
Area 6

- Admiral Urban Center (pre-Council Amendments)
- Morgan Junction Urban Center (pre-Council Amendments & Amendment 37)
- Fauntleroy Neighborhood Center (pre-Council Amendments & Amendment 35)
- High Point Neighborhood Center (Amendment 36)

Area 7 (none)

Area 8 (none)








Greenwood

Revised boundary

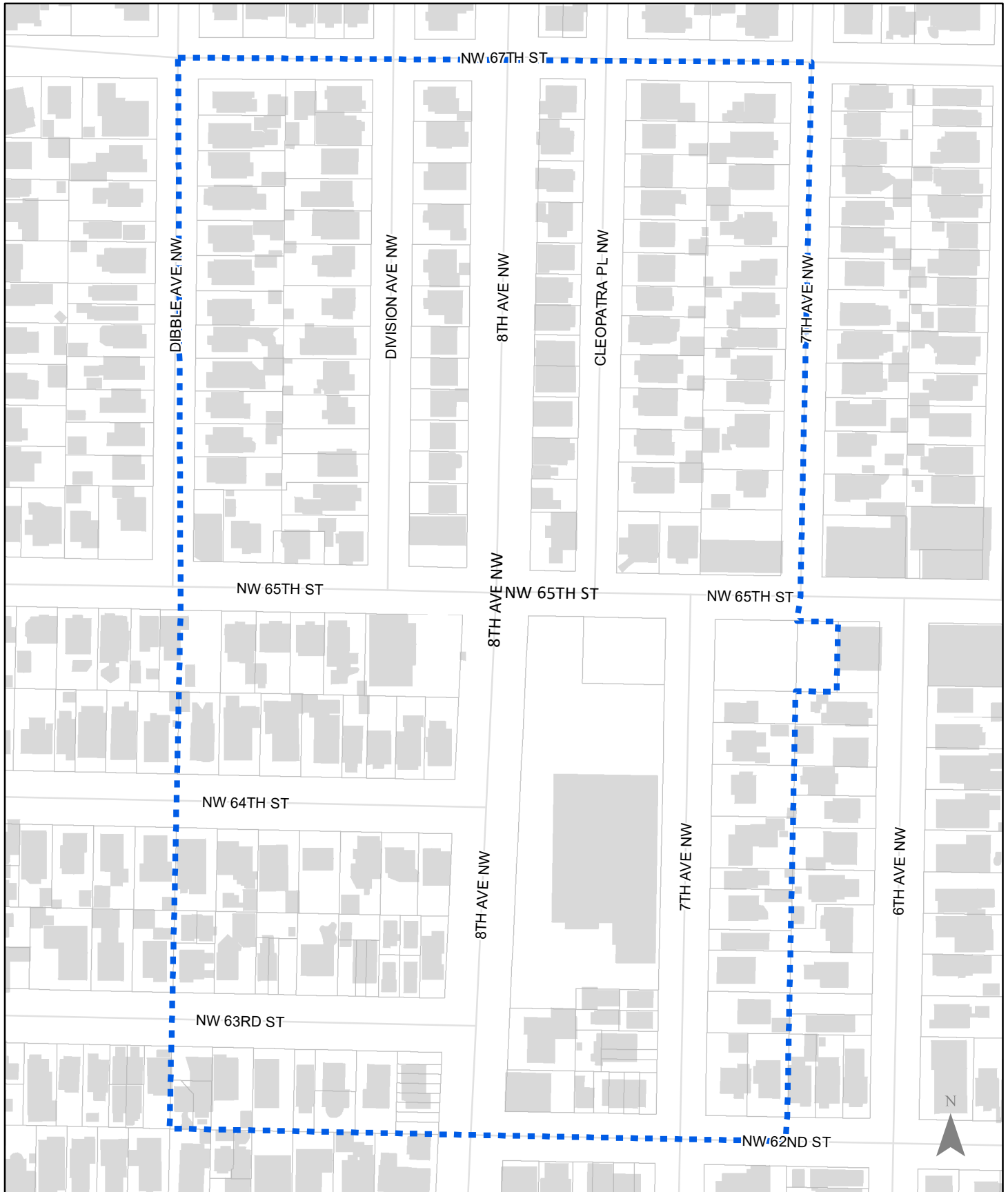
-  Neighborhood Center
-  Urban Center
-  Regional Center

Original draft boundary

-  Neighborhood Center
-  Urban Center
-  Regional Center

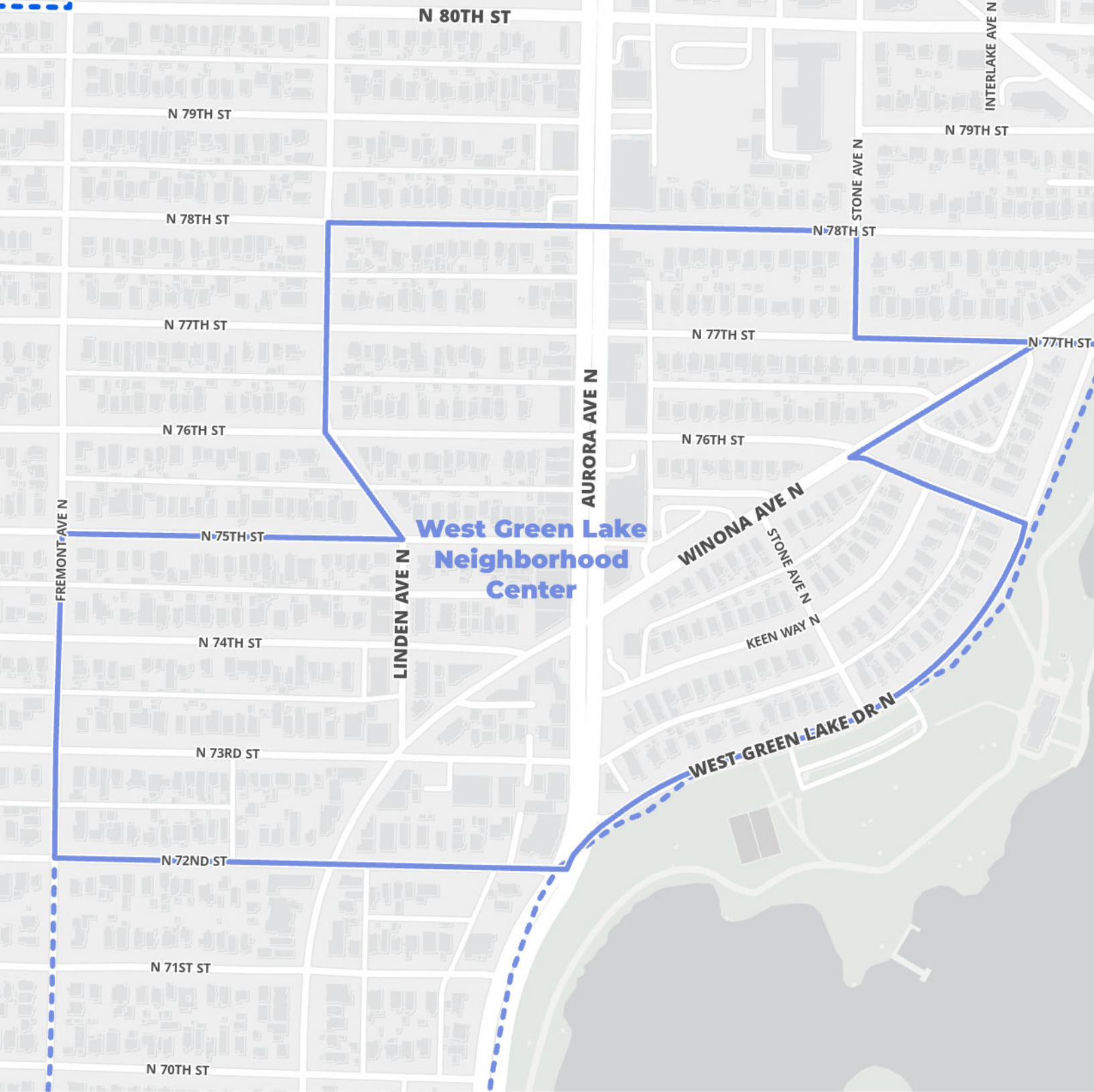
Existing center boundary






 New Neighborhood Center Boundary






West Green Lake

Revised boundary

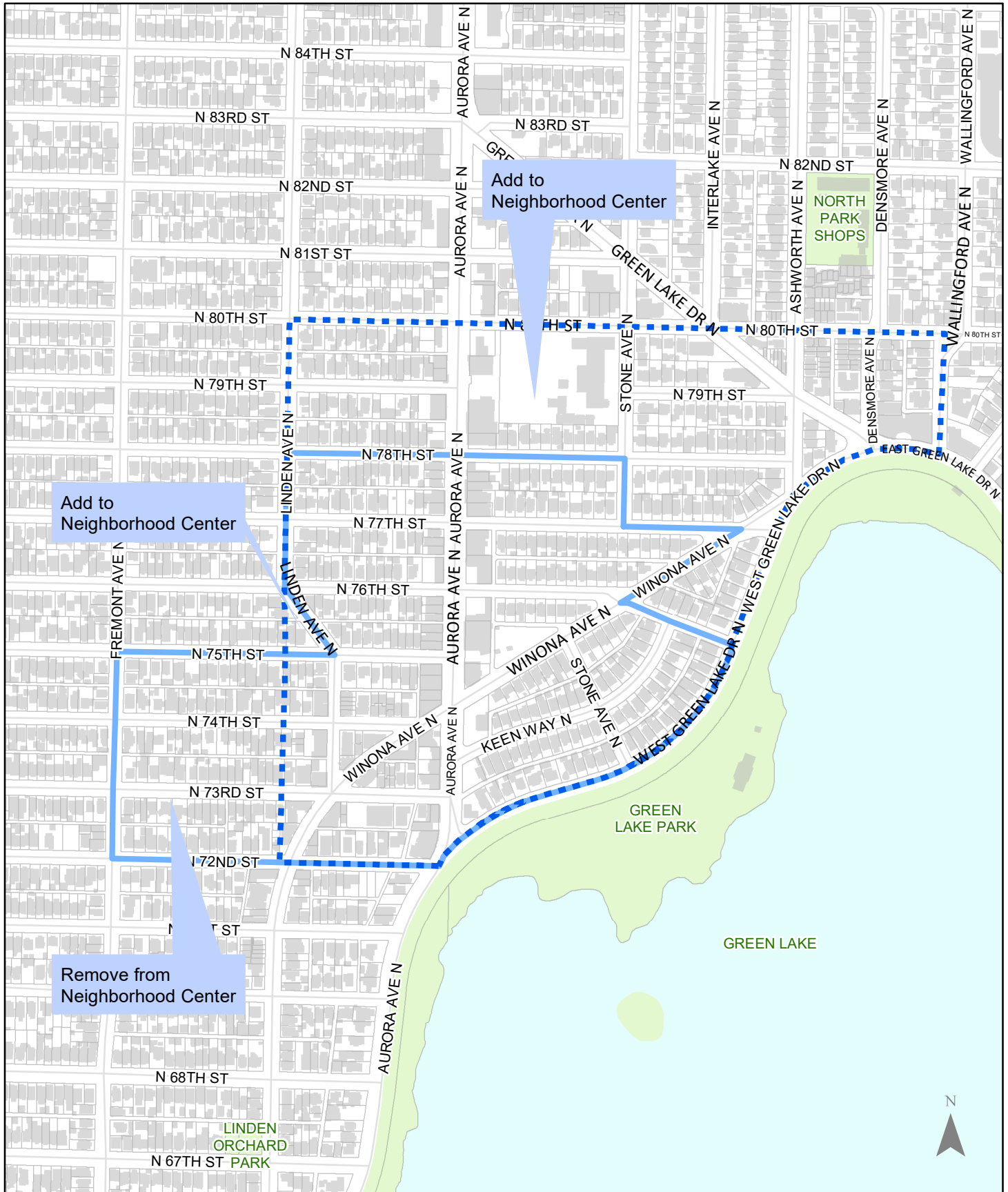
-  Neighborhood Center
-  Urban Center
-  Regional Center


Original draft boundary

-  Neighborhood Center
-  Urban Center
-  Regional Center

Existing center boundary







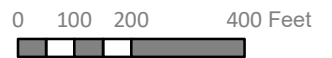
 New Neighborhood Center Boundary

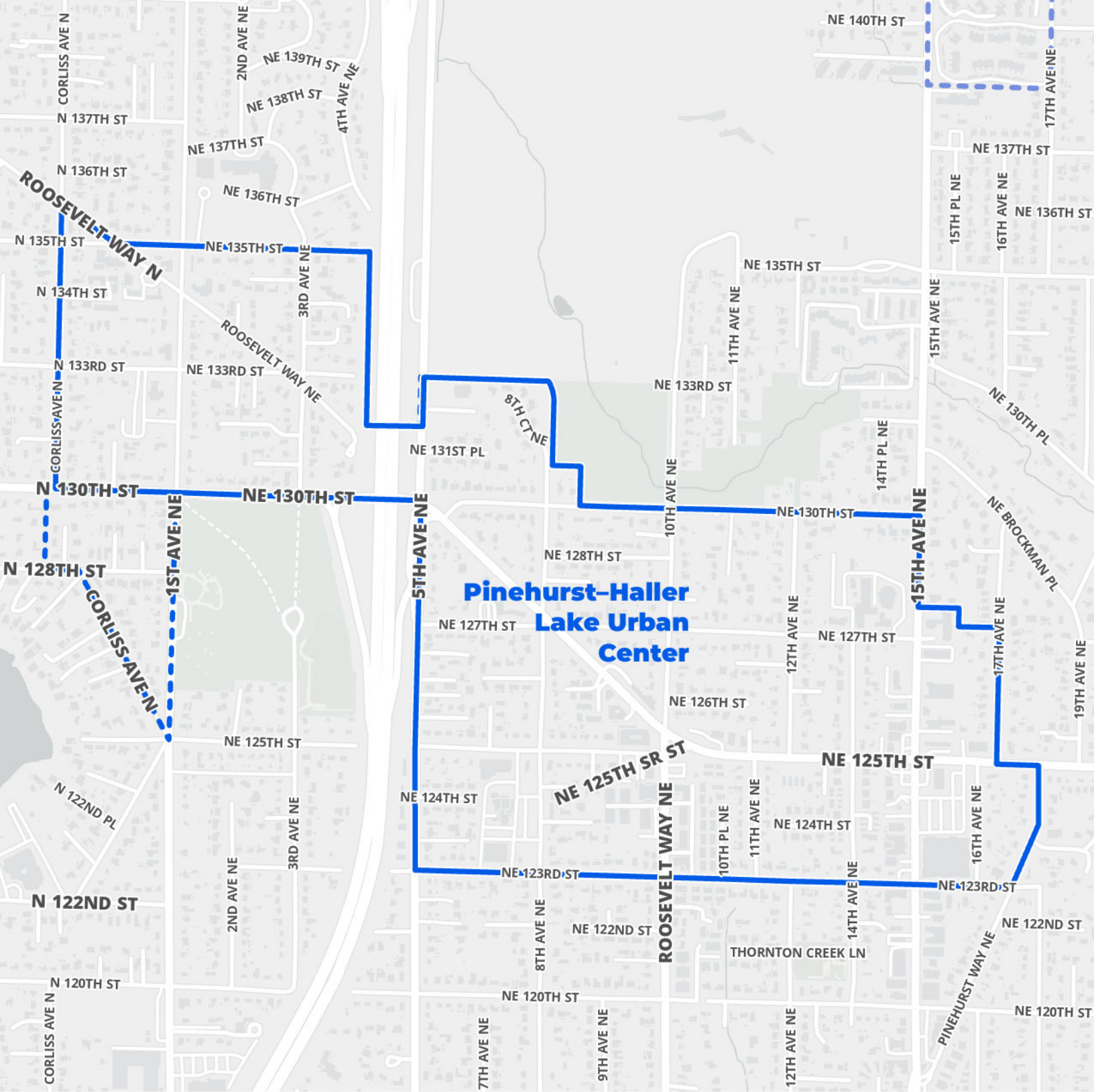
 Neighborhood Centers



 New Neighborhood Center Boundary

 Neighborhood Centers







Pinehurst-Haller Lake

Revised boundary

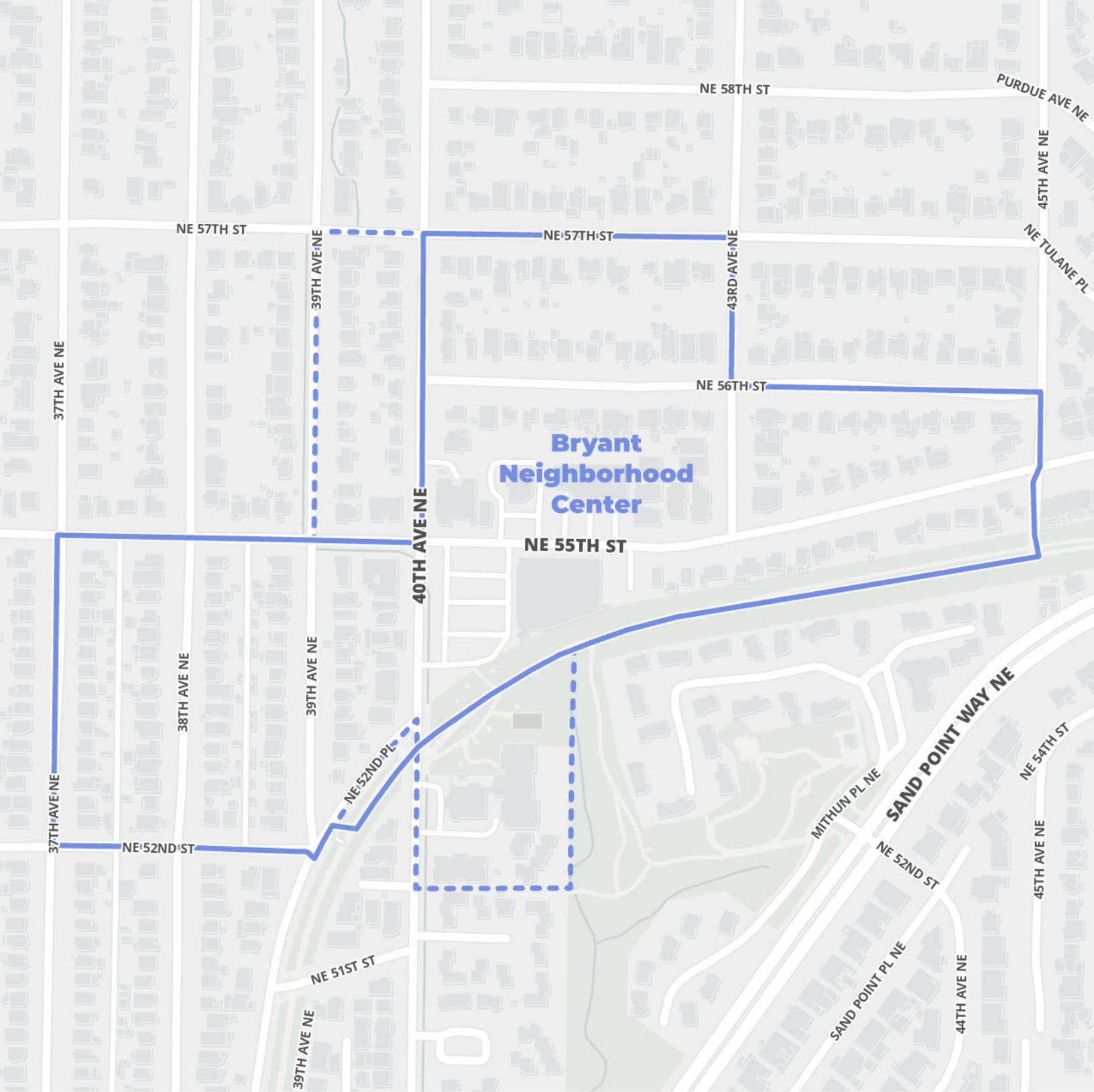
-  Neighborhood Center
-  Urban Center
-  Regional Center

Original draft boundary

-  Neighborhood Center
-  Urban Center
-  Regional Center

Existing center boundary








Bryant

Revised boundary

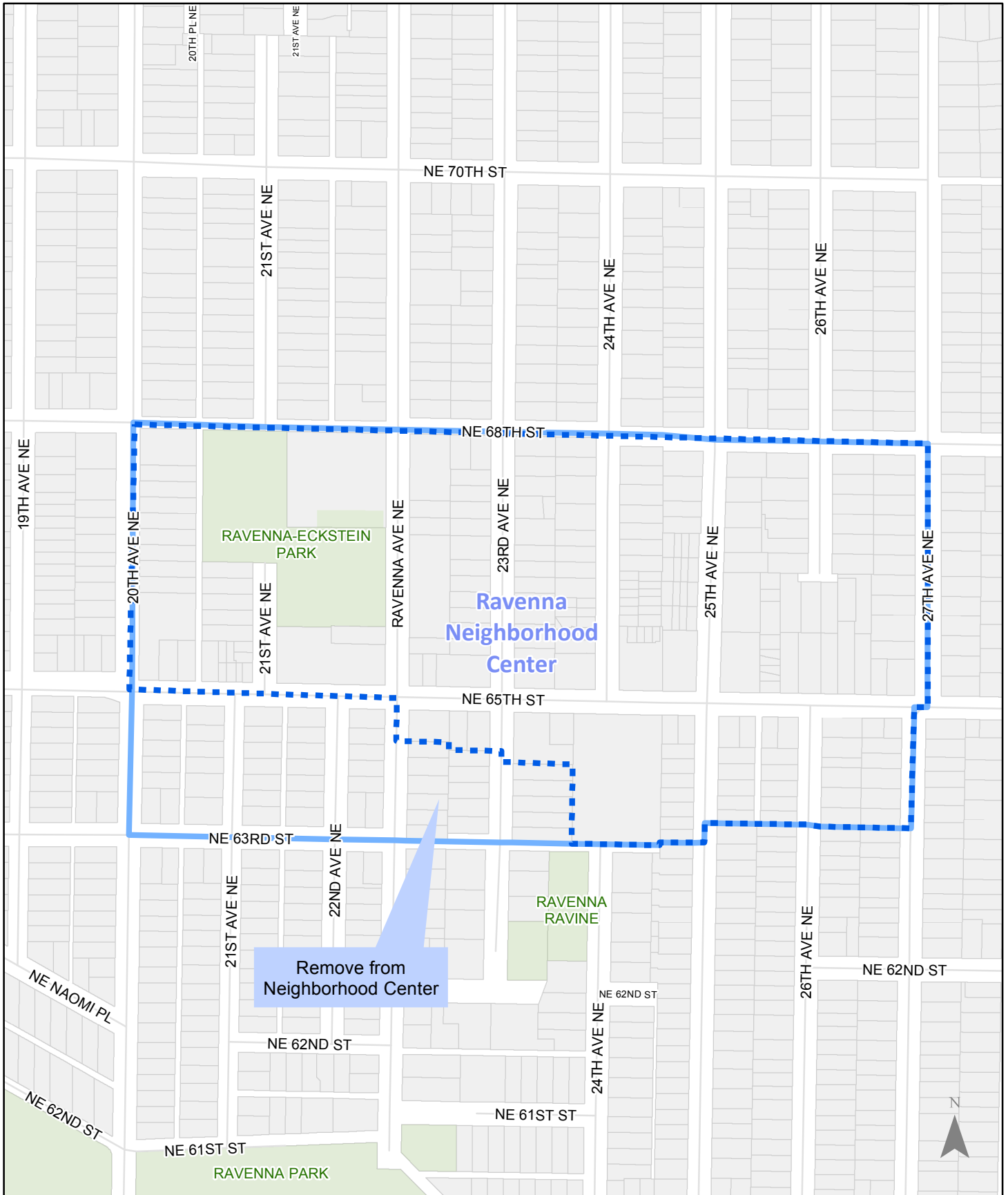
-  Neighborhood Center
-  Urban Center
-  Regional Center



Original draft boundary

-  Neighborhood Center
-  Urban Center
-  Regional Center

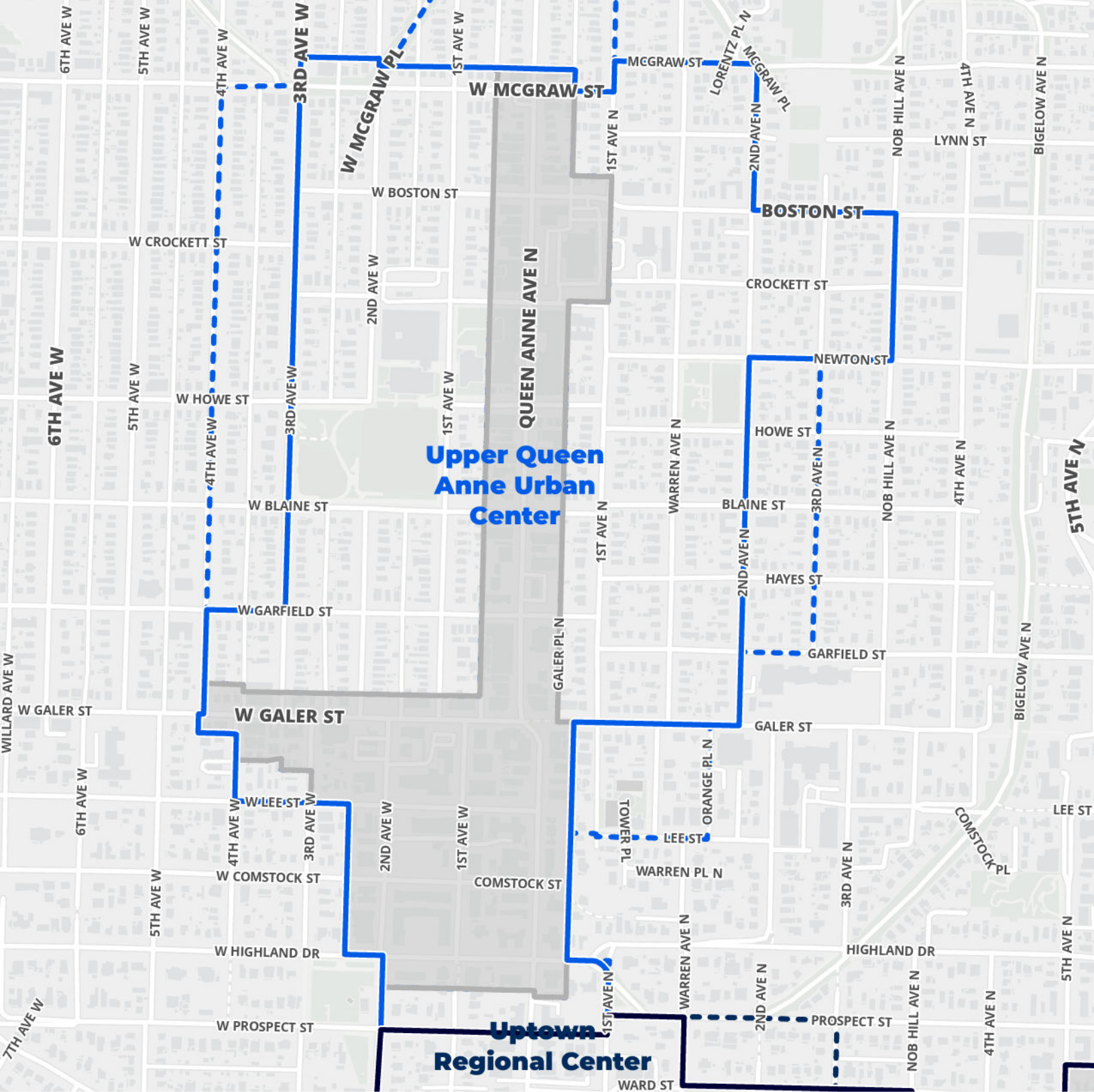
Existing center boundary








 New Neighborhood Center Boundary  Neighborhood Centers

0 100 200 400 Feet






Upper Queen Anne

Revised boundary

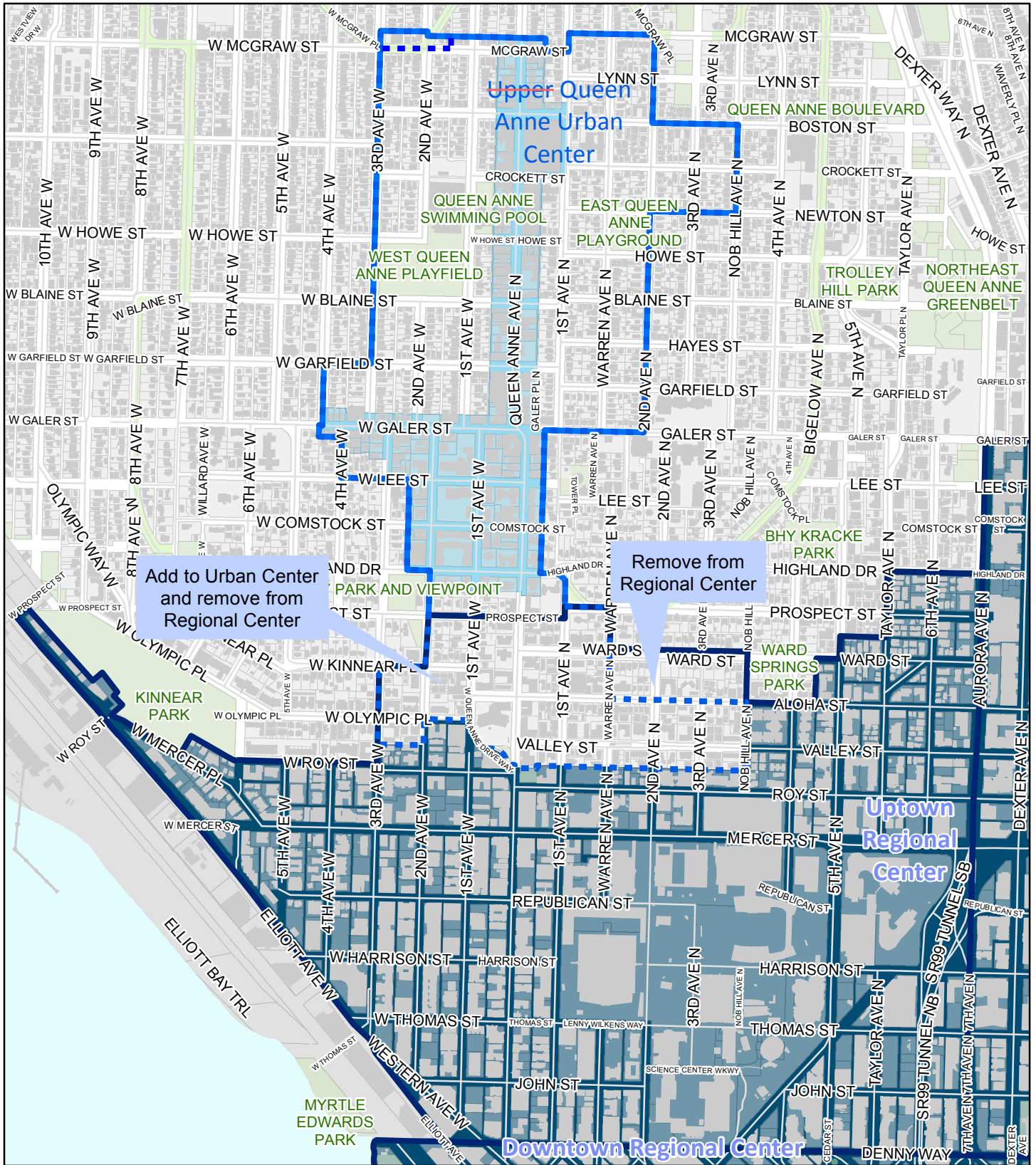
-  Neighborhood Center
-  Urban Center
-  Regional Center








Original draft boundary

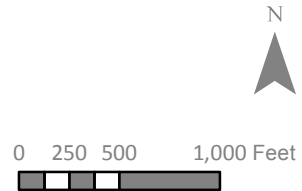
-  Neighborhood Center
-  Urban Center
-  Regional Center

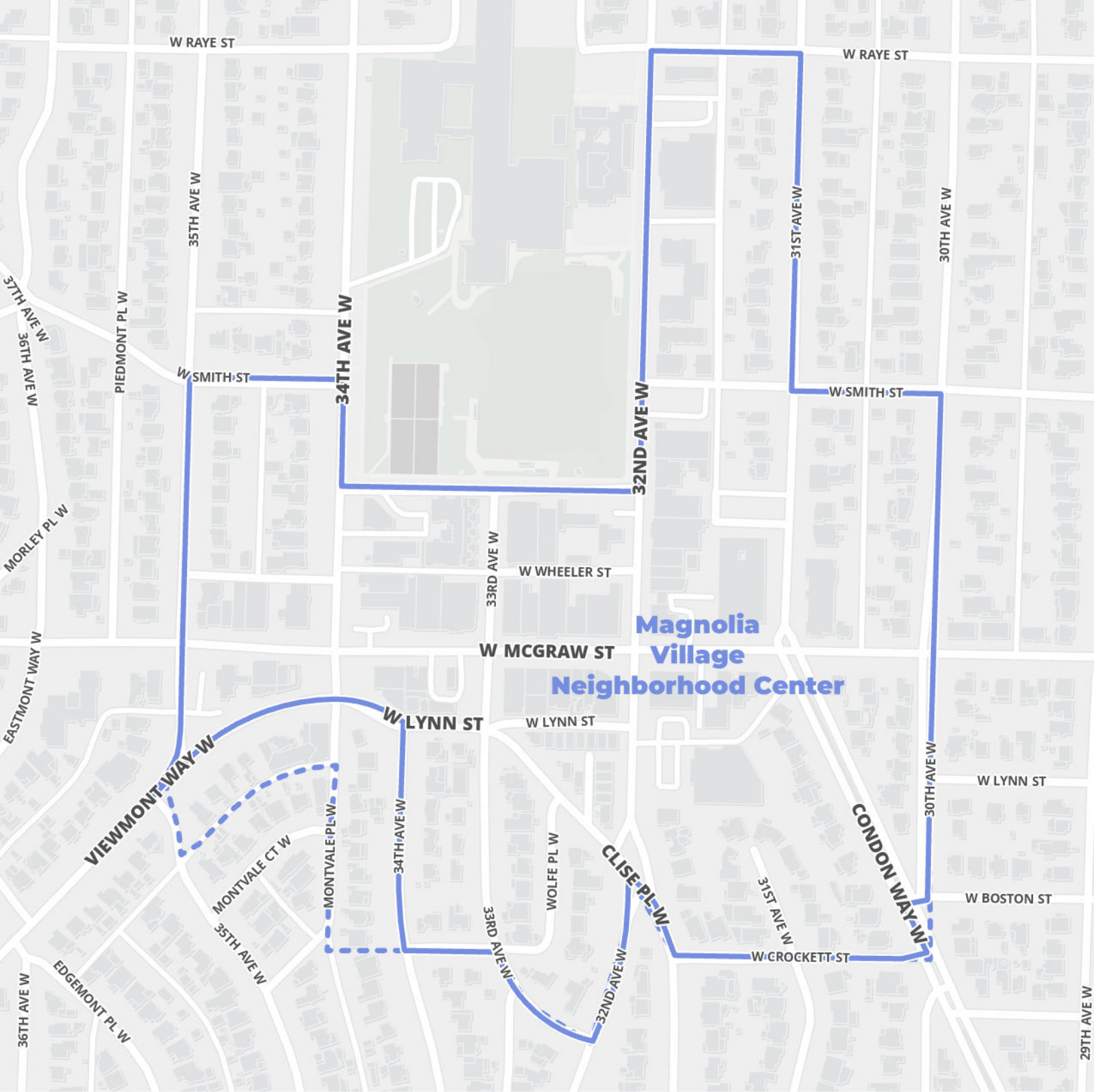
Existing center boundary





-  New Urban Center Boundary
-  Proposed Regional Center Boundary
-  Proposed Urban Center Boundary
-  Urban Center
-  Hub Urban Village
-  Residential Urban Village
-  Manufacturing Industrial







Magnolia Village

Revised boundary

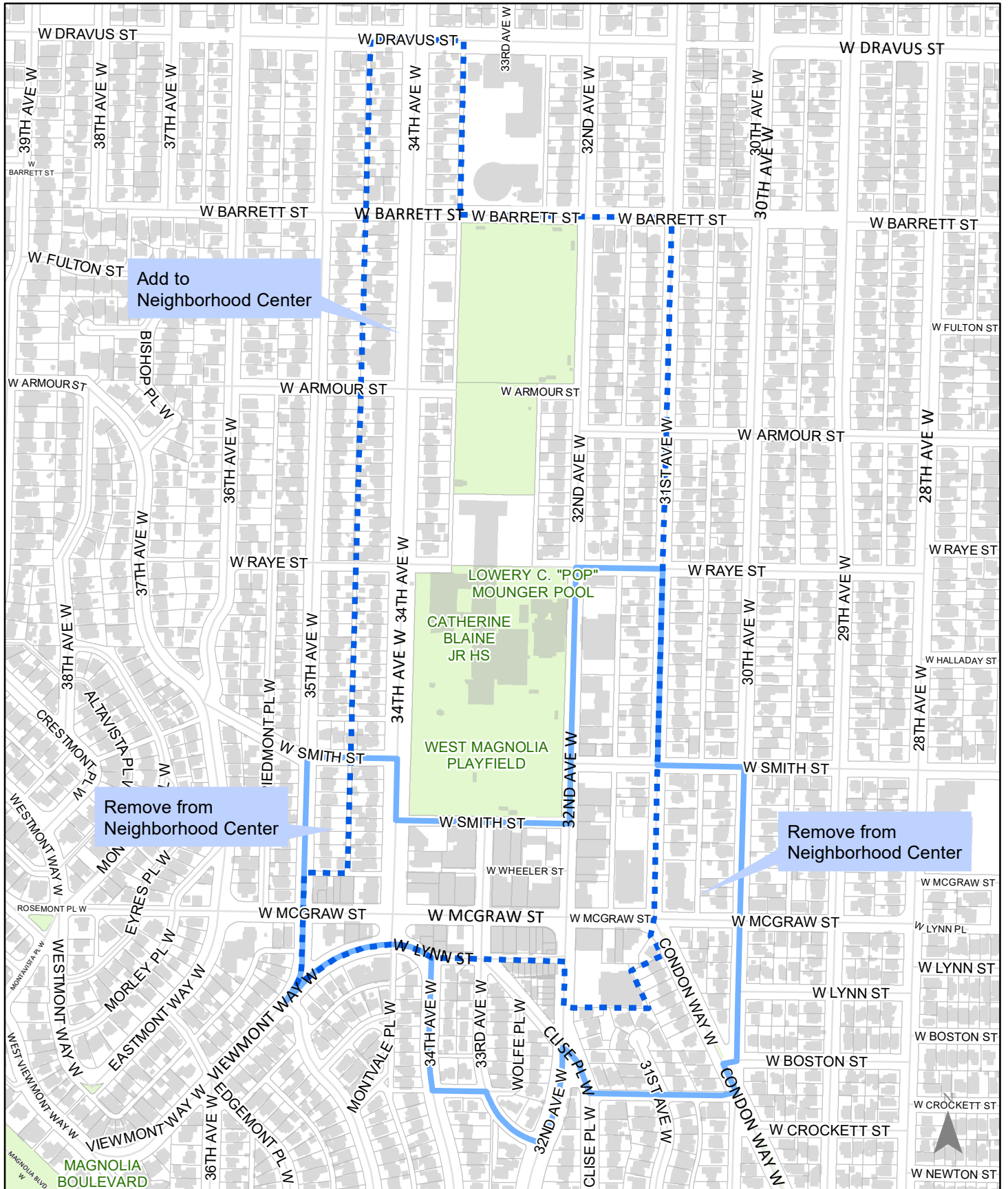
-  Neighborhood Center
-  Urban Center
-  Regional Center


Original draft boundary

-  Neighborhood Center
-  Urban Center
-  Regional Center

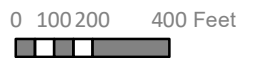
Existing center boundary

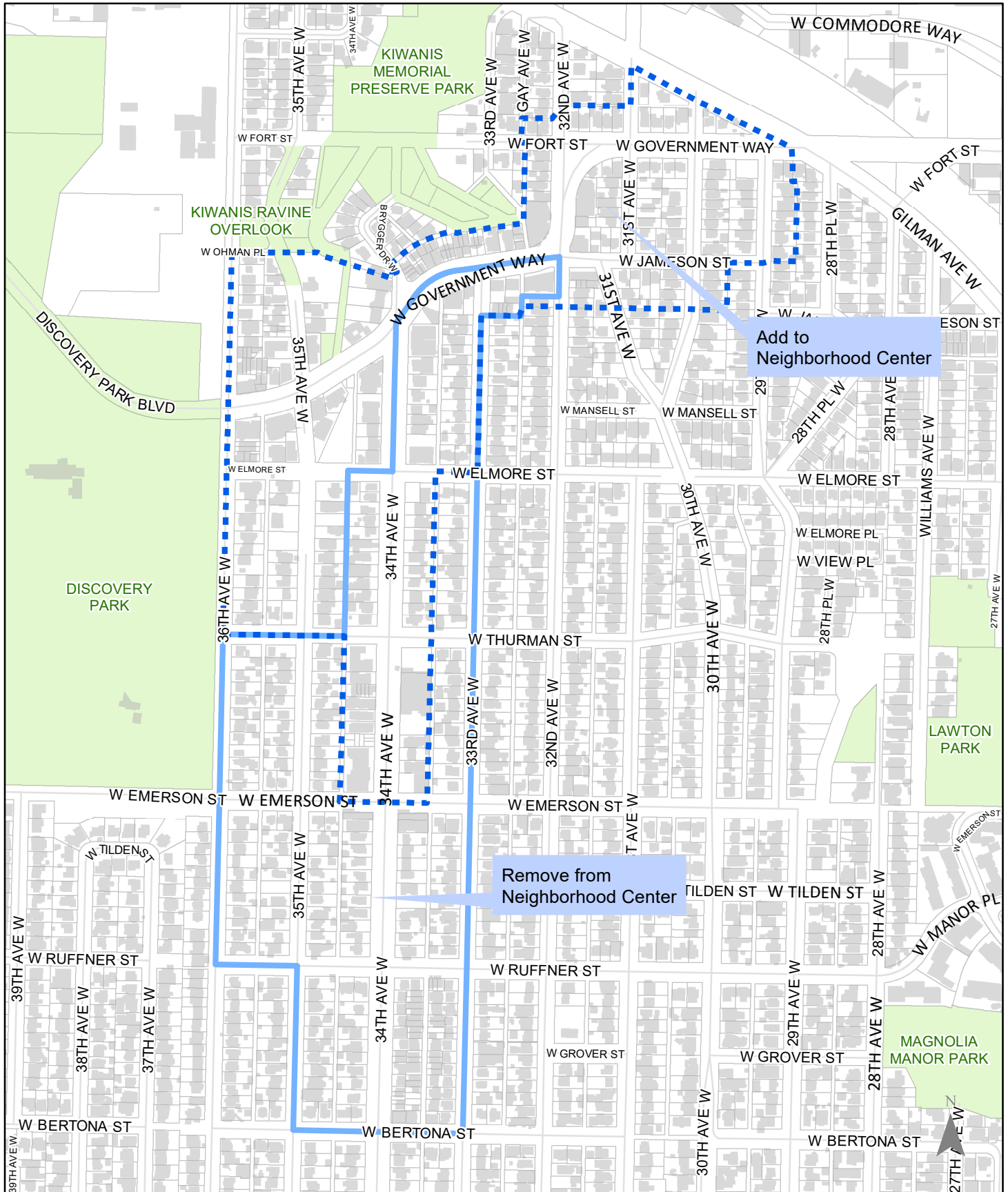





 New Neighborhood Center Boundary

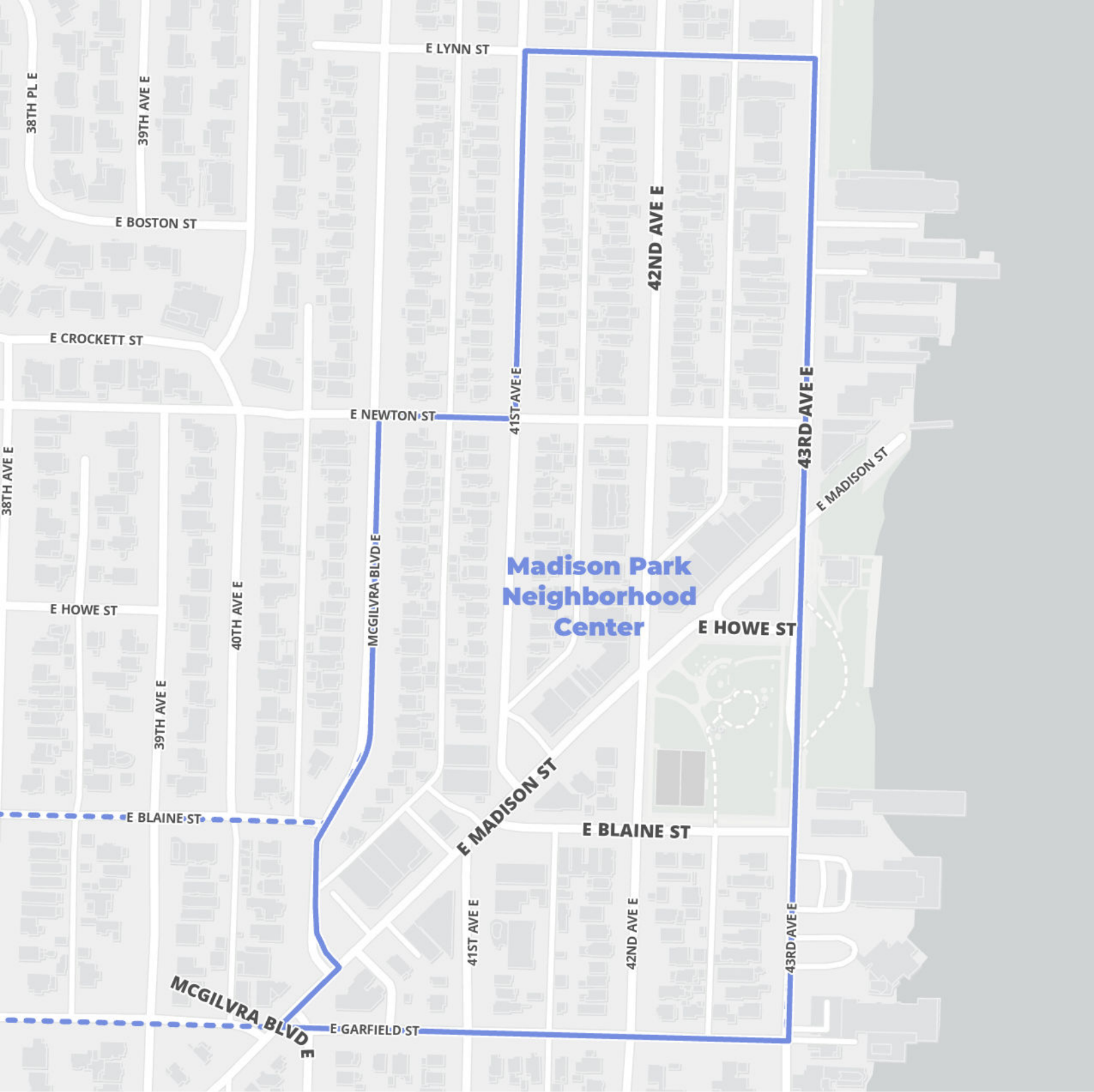
 Neighborhood Centers






 New Neighborhood Center Boundary

 Neighborhood Centers






Madison Park

Revised boundary

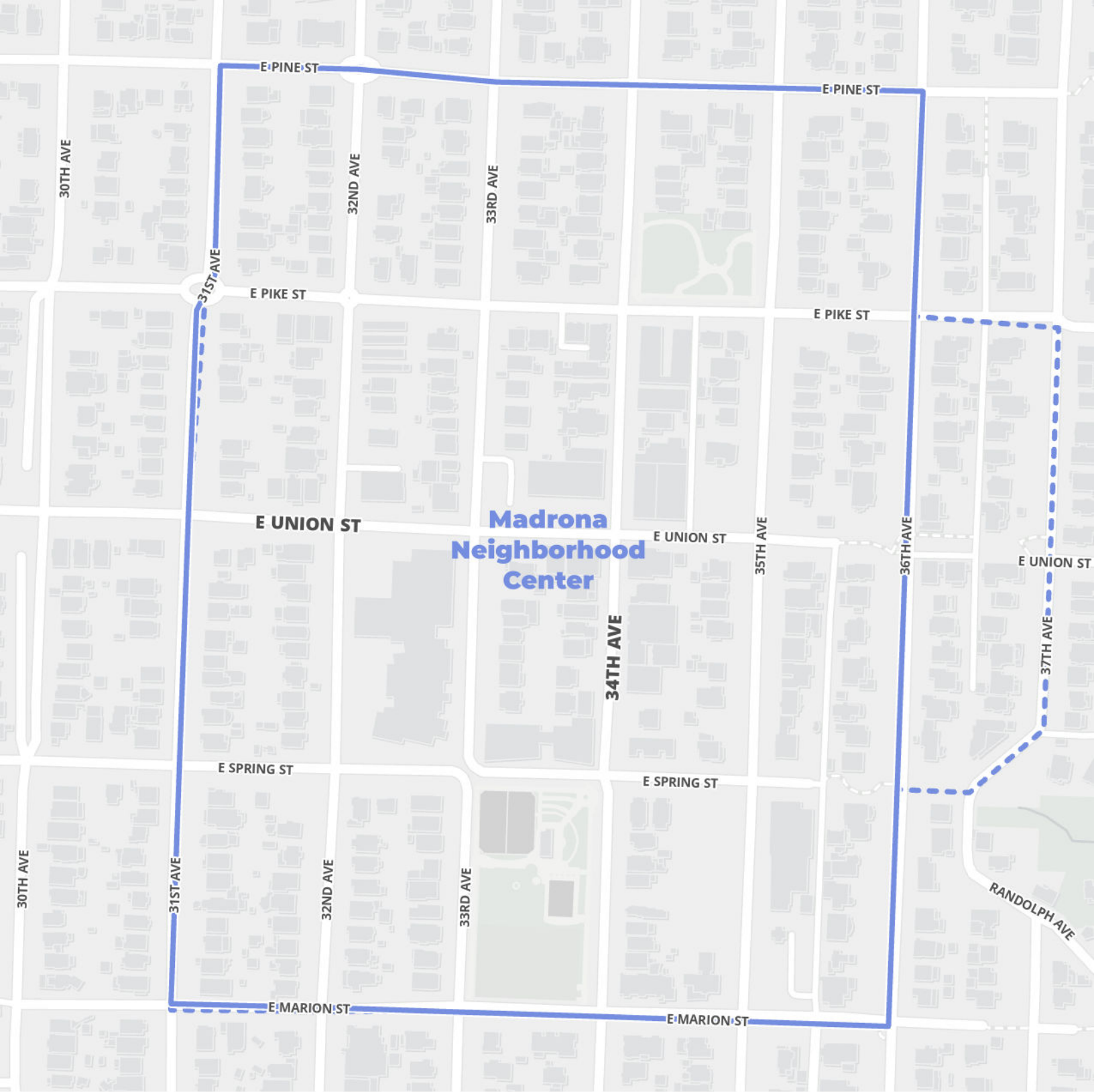
-  Neighborhood Center
-  Urban Center
-  Regional Center

Original draft boundary

-  Neighborhood Center
-  Urban Center
-  Regional Center



Existing center boundary







Madrona

Revised boundary

-  Neighborhood Center
-  Urban Center
-  Regional Center

Original draft boundary

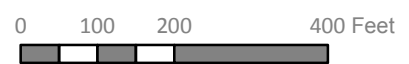
-  Neighborhood Center
-  Urban Center
-  Regional Center

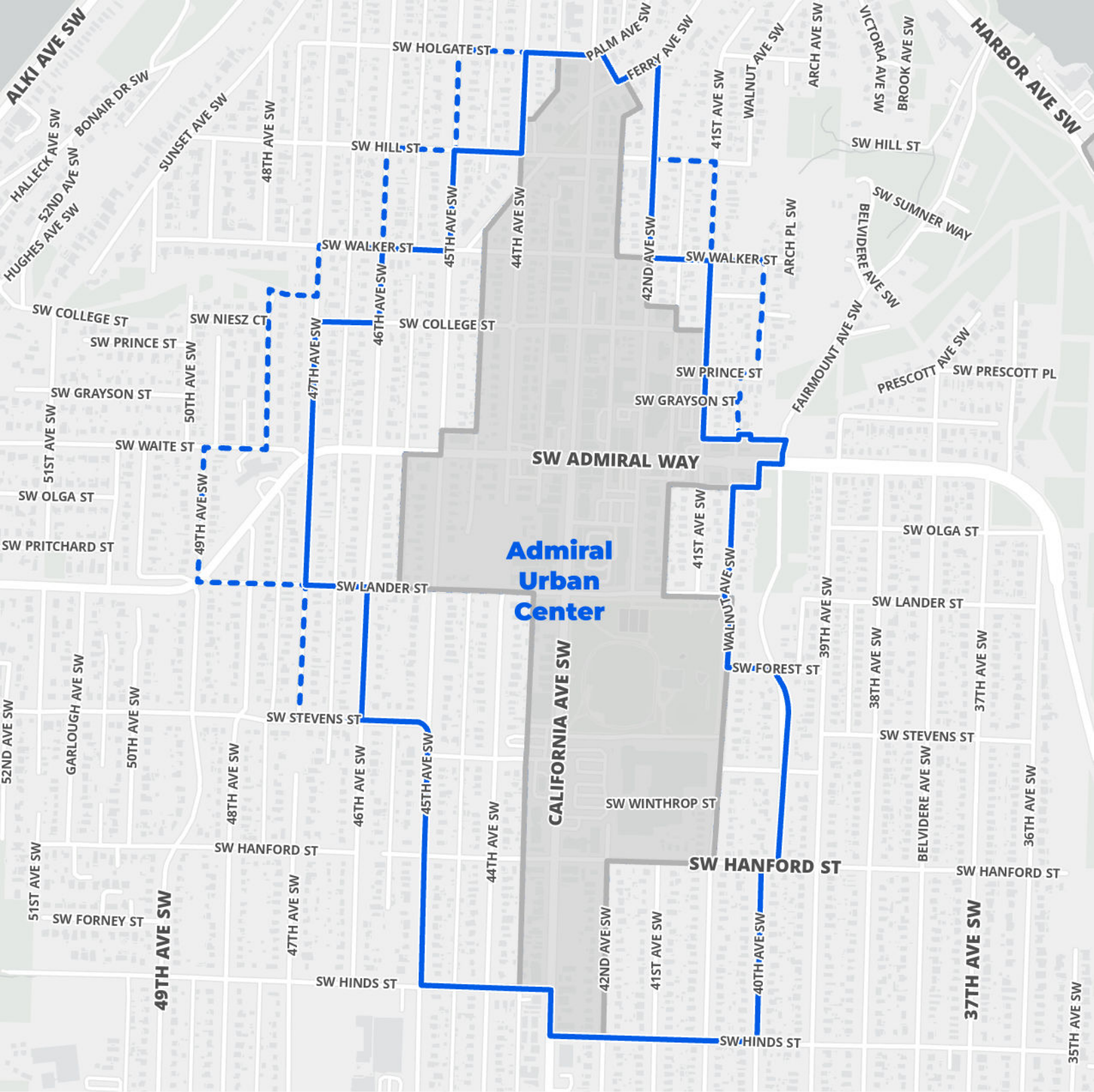
Existing center boundary





 New Center Boundary  Proposed Neighborhood Center Boundary







Admiral

Revised boundary

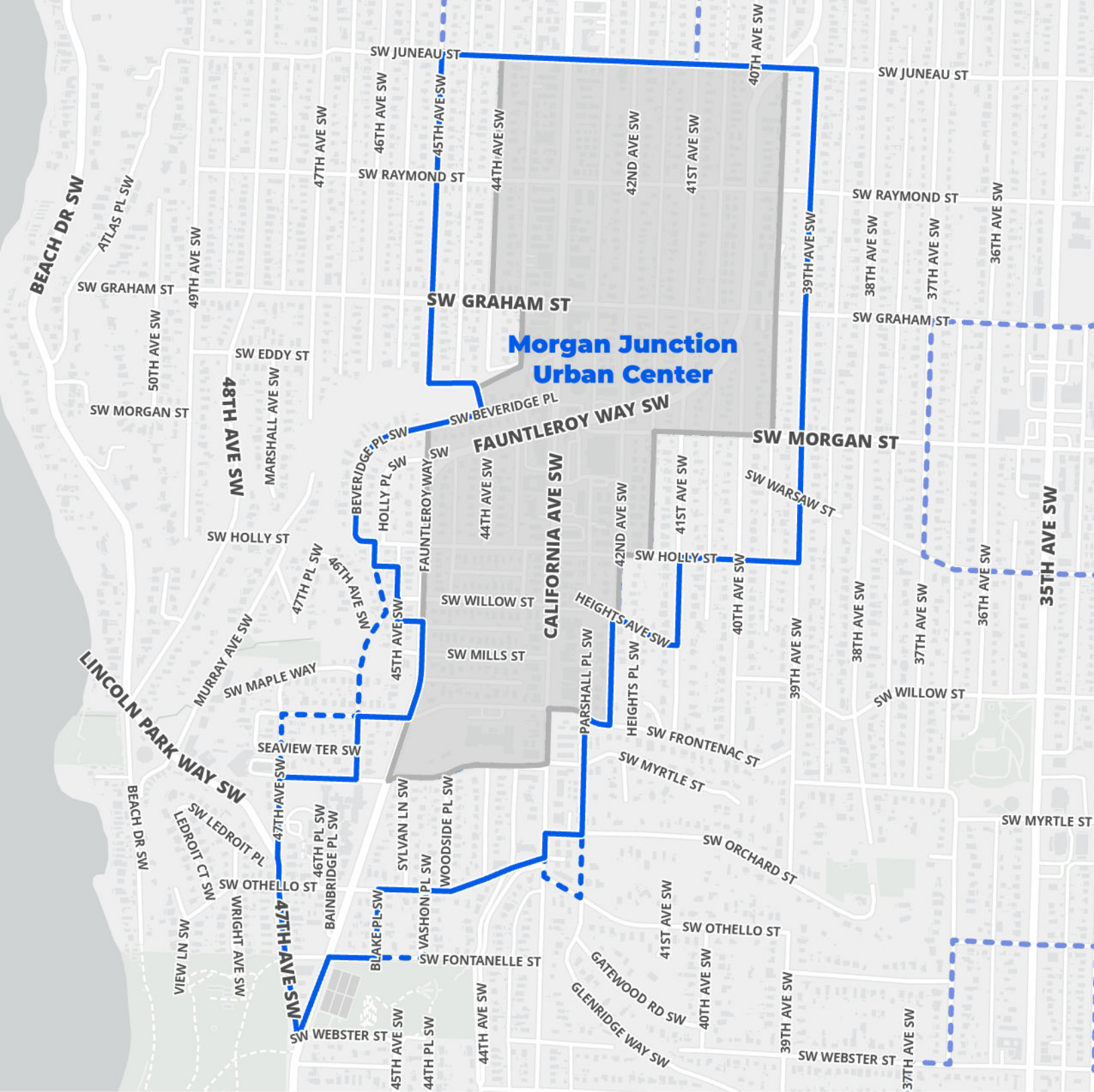
-  Neighborhood Center
-  Urban Center
-  Regional Center

Original draft boundary

-  Neighborhood Center
-  Urban Center
-  Regional Center




Existing center boundary






Morgan Junction

Revised boundary

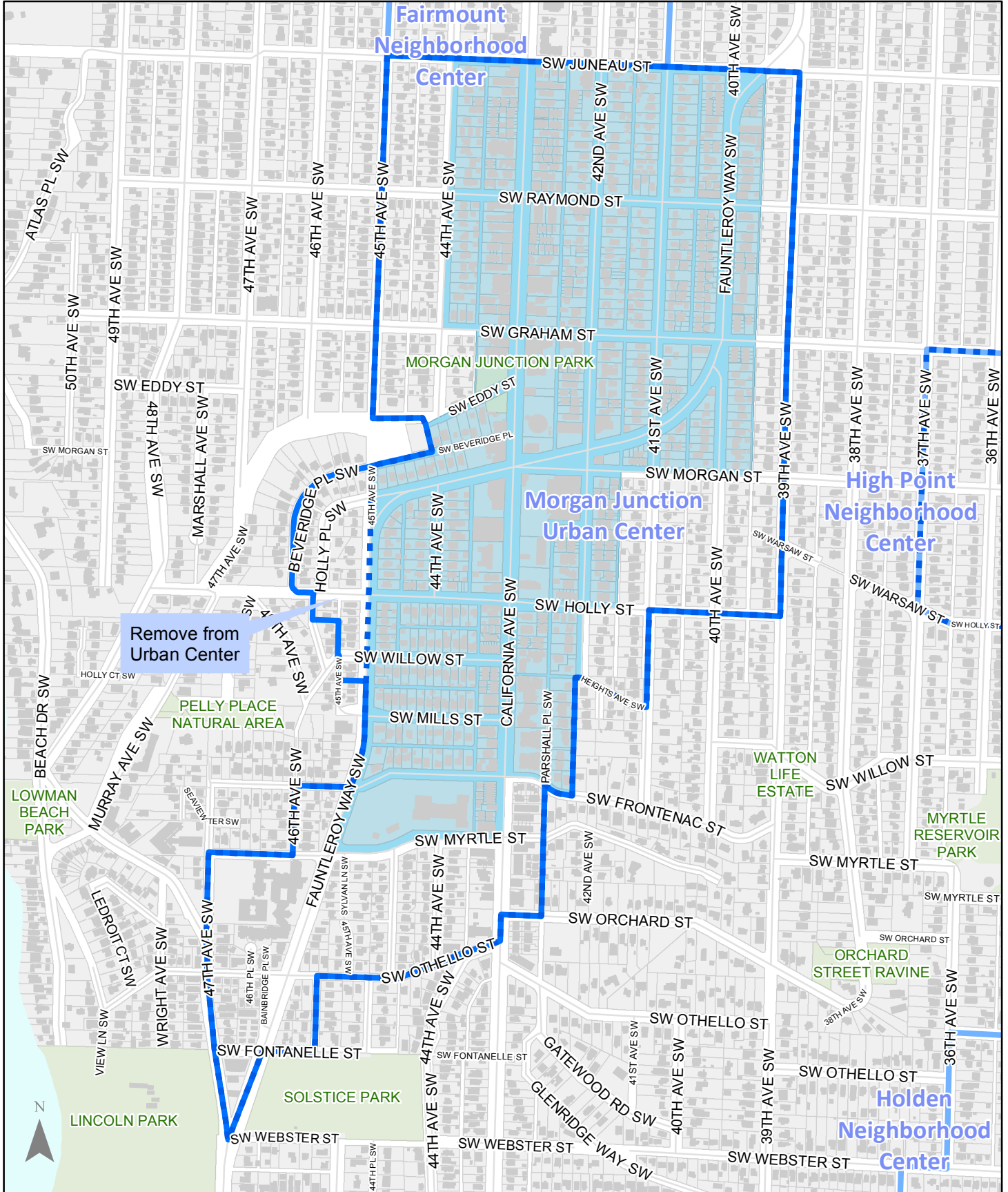
-  Neighborhood Center
-  Urban Center
-  Regional Center

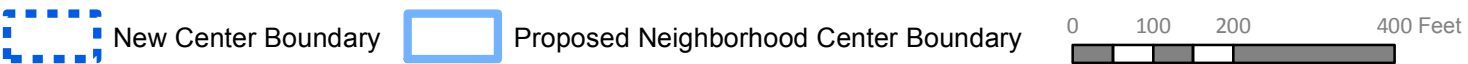
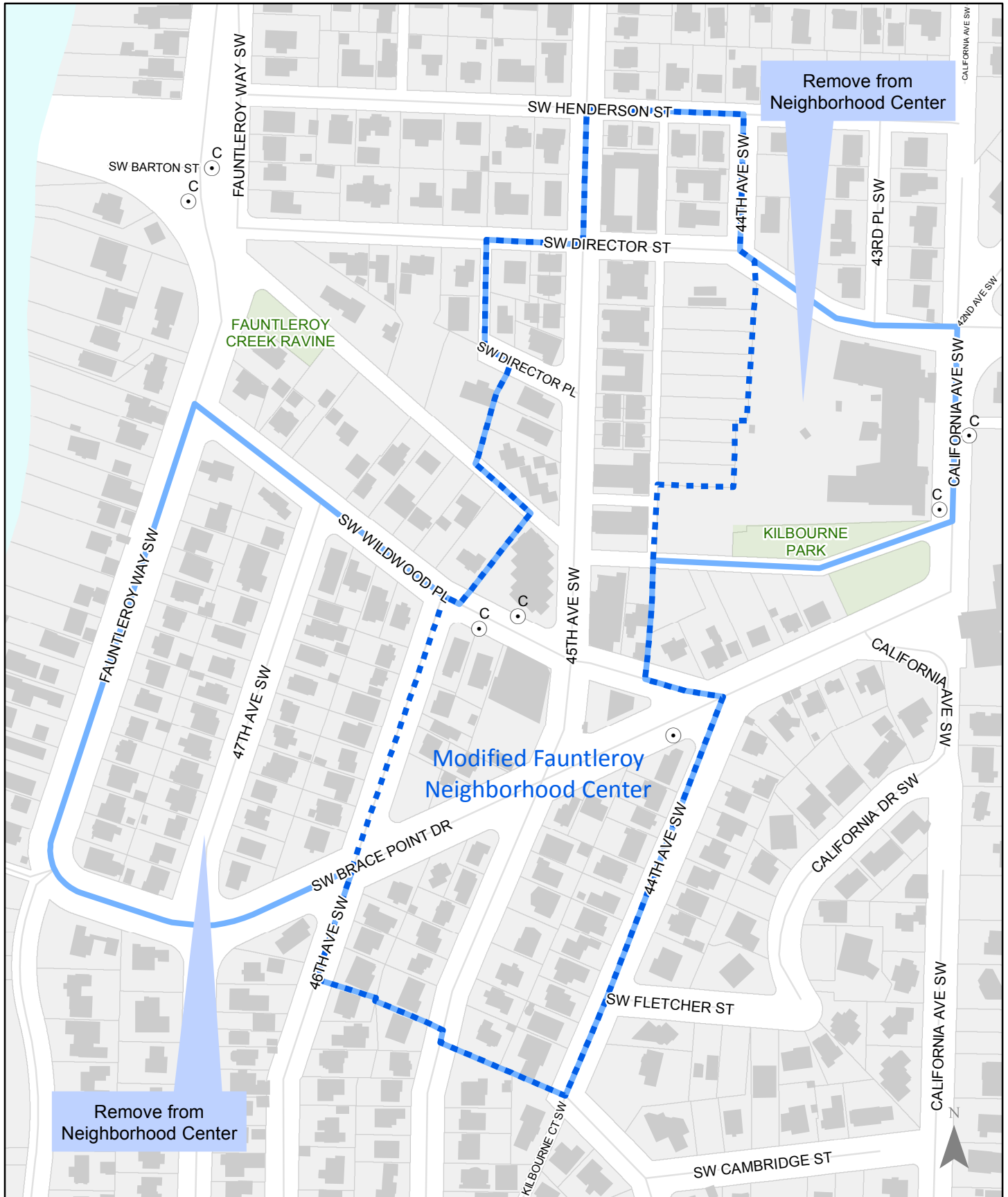
Original draft boundary

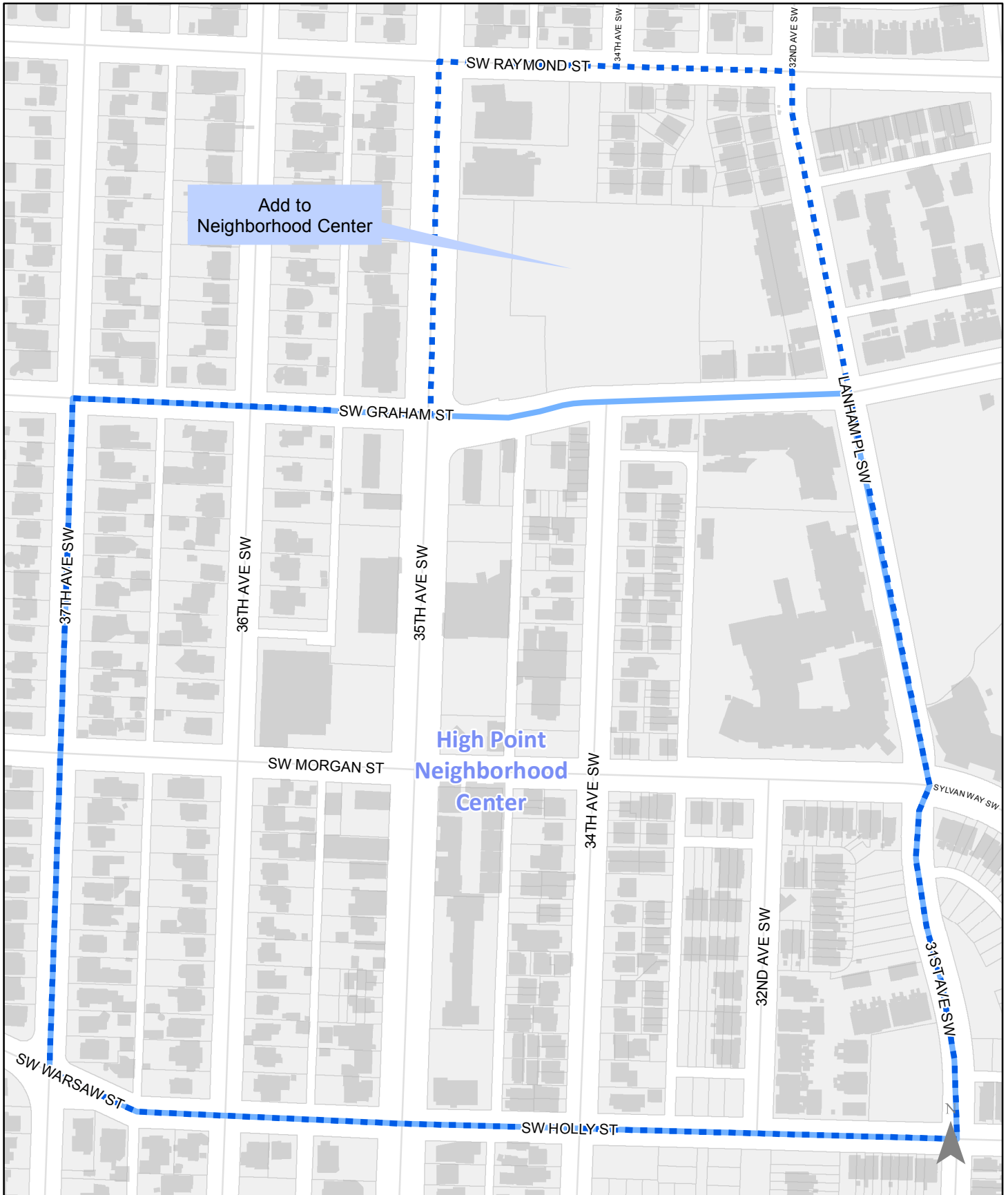
-  Neighborhood Center
-  Urban Center
-  Regional Center



Existing center boundary









 New Urban Center Boundary  Neighborhood Centers



C Place Type Comparison Tables

Under both the FEIS Preferred Alternative and Revised Proposal, assumed growth is expected to be about 120,000 new dwellings and 158,000 jobs for the period 2024-2044. Since the publication of the FEIS Place Types, estimates are slightly adjusted for consistency with the Preferred Alternative mapping of place types, which results in a small shift of approximately 212 housing units from Frequent Transit Corridor to Neighborhood Center and to shift 210 jobs from Frequent Transit Corridor to Neighborhood Center. Other minor differences are in Urban Neighborhood. This is a fraction of less than 1% change in distribution across the city and does not change the conclusions of the FEIS regarding the Preferred Alternative.

Citywide and Place Type Comparison—FEIS as Published

Place Type Code	Place Type Name	FEIS Preferred Alternative (as Published)		Revised Proposal		Delta	
		Housing Units	Jobs	Housing Units	Jobs	Units	Jobs
RC-METRO	Regional Center - Metro	35,000	94,500	35,000	94,500	0	0
RC-URBAN	Regional Center - Urban	8,000	6,500	8,000	6,500	0	0
UC	Urban Center	29,022	15,280	29,022	15,280	0	0
NC	Neighborhood Center	11,557	5,506	11,793	5,730	236	224
MIC	Manufacturing Industrial Center	800	18,800	800	18,800	0	0
UN	Urban Neighborhood	23,607	11,466	23,589	11,460	-18	-6
FTC	Frequent Transit Corridor	12,007	5,940	11,794	5,730	-212	-210
Total		119,993	157,992	119,999	158,000	6	8

Sources: City of Seattle, 2025; BERK, 2025.

Citywide and Place Type Comparison—FEIS as Adjusted

Place Type Code	Place Type Name	FEIS—Place Type Adjusted		Revised Proposal		Difference	
		HU Target	Jobs Target	HU Target	Jobs Target	HU	Jobs
RC-METRO	Regional Center - Metro	35,000	94,500	35,000	94,500	0	0
RC-URBAN	Regional Center - Urban	8,000	6,500	8,000	6,500	0	0
UC	Urban Center	29,022	15,280	29,022	15,280	0	0
NC	Neighborhood Center	11,787	5,722	11,793	5,730	6	8
MIC	Manufacturing Industrial Center	800	18,800	800	18,800	0	0
UN	Urban Neighborhood	23,589	11,460	23,589	11,460	0	0
FTC	Frequent Transit Corridor	11,794	5,730	11,794	5,730	0	0
Total		119,993	157,992	119,999	158,000	6*	8*

HU = housing unit.

* At the citywide scale, small differences are due to rounding errors.

Sources: City of Seattle, 2025; BERK, 2025.