



**ANALYSIS AND DECISION OF THE DIRECTOR
OF THE DEPARTMENT OF CONSTRUCTION AND INSPECTIONS**

**SEPA Threshold Determination
for
2021 Affordable Housing on Religious Properties Land Use Code Amendments**

Project Proponent: City of Seattle

BACKGROUND

The proposed code changes would fulfill requirements in Substitute House Bill 1377, passed by the Washington State Legislature in 2019, amending 35.63 RCW, 35A.63 RCW, 36.70A RCW, and 44.28 RCW. The State's legislation was meant to support affordable housing development for low-income households on properties owned or controlled by a religious organization, by requiring increased permissible densities and at least a 50-year commitment to the affordable housing.

Religious organizations own property currently in use as religious facilities as well as property with other uses, such as accessory parking, residential, office, or school uses.

The proposed Land Use Code changes would affect properties located throughout Seattle in many different zones. The analysis in Appendix A (the staff report for the proposal) shows that properties currently owned by religious organizations are located in many zones and across all Seattle neighborhoods. Many sites and much of the land area these organizations currently own are located in single-family zones. See Appendix A for detail by zone on the location, number, and land area of religious organization-owned sites.

PROPOSAL

The proposal is a non-project action that would implement a suite of land use code changes in zones throughout Seattle to support development of affordable housing on property owned or controlled by a religious organization. Increases in maximum height and floor area limits and changes to other development standards would allow additional development of long-term, income-restricted affordable housing on property that meets certain eligible criteria.

This additional development potential would be available for construction of affordable housing, in all zones that allow housing, on properties owned or controlled by religious institutions. This is subject to several criteria. All housing developed with these provisions, whether rental or ownership, would be reserved for households whose incomes are at or below 80 percent of area median income (AMI) for at least 50 years. This affordability term would apply even if the property is no longer owned by a religious organization.

The specific changes in development standards would vary by zone, as summarized in the tables below and Appendix A. In most zones, the primary code changes would be to maximum height and floor area ratio (FAR) limits, two key development standards that regulate the amount of development allowed on a site. (An FAR of 1.0 is defined as an amount of building floor area equal to the property's total land area in square feet). Where applicable, the proposal would increase maximum density limits to allow more housing units on a given site. Certain amounts of floor area devoted to certain uses — such as family-size housing,

religious facility, and preservation or adaptive reuse of landmark structures — would be exempt from floor-area-limit FAR calculations, meaning they are not counted against the code’s limits on floor area.

In certain circumstances, the proposal would allow uses not otherwise allowed or allowed only as conditional uses under existing zoning in order to accommodate activities, functions, and services commonly performed by religious institutions.

Multifamily Residential, Commercial, and Neighborhood Commercial zones

In multifamily and mixed-use zones, the proposal would allow additional development potential primarily through increases in maximum height and FAR limits. In most zones, the proposal would allow one to three additional stories of development compared to existing standards. Zones with this degree of change represent the majority of land area where multifamily and mixed-use development is allowed in Seattle. In some zones with higher current height limits, the proposal would allow four to six additional stories (although only approximately four properties citywide may fit the religious property criteria in these commercial zones with current 85- and 95-foot height limits). No reductions in setback or design requirements are proposed.

**Table 1
 Proposed Height and Density Limits for Affected Properties**

Zone	Current standards		Proposed standards for affordable housing on property owned or controlled by a religious organization		Floor area exempt from FAR if located in urban village or near frequent transit ¹
	Height (feet)	FAR	Height (feet)	FAR	FAR amount
Multifamily Residential zones					
LR1	30	1.3	40	1.5	Up to 0.3
LR2	40	1.4-1.6	50	1.8	Up to 0.3
LR3	<i>Outside UV</i>	1.8	55	2.5	Up to 0.5
	<i>Inside UV</i>	2.3	65	3.25	Up to 0.5
MR	80	4.5	95	5.0	Up to 0.5
HR	440	15	480	16	Up to 1.0
Commercial and Neighborhood Commercial zones					
NC-30 / C-30	30	2.5	55	3.25	Up to 0.5
NC-40 / C-40	40	3.0	75	4.5	Up to 0.5
NC-55 / C-55	55	3.75	85	5.25	Up to 0.5
NC-65 / C-65	65	4.5	95	5.75	Up to 0.5
NC-75 / C-75	75	5.5	95	5.75	Up to 0.5
NC-85 / C-85	85	5.75	145	7.0	Up to 1.0
NC-95 / C-95	95	6.25	145	7.0	Up to 1.0
NC-145 / C-145	145	7.0	200	8.0	Up to 1.0
NC-200 / C-200	200	8.25	240	9.0	Up to 1.0

¹ Floor area exempt for certain uses: family-size housing, religious facility use, or adaptive reuse or preservation of existing landmark or historic structure.

In multifamily lowrise residential zones, small ground-floor commercial spaces would be allowed, subject to existing standards written for Residential–Commercial zones in SMC Chapter 23.46. These include limits on the size of the space, signage requirements, and noise standards. This change for lowrise multifamily residential zones could allow an office associated with the religious institution that owns the property; small retail, like a corner grocer; arts and cultural space; or other small-scale commercial uses, up to 4,000 square feet in size.

In Commercial and Neighborhood Commercial zones, the proposal would increase height and floor area limits for affordable housing development and provide an FAR exemption for certain uses and in certain locations, as described above. Some of the additional permitted floor area (measured in units of FAR) would be available only for development that would exceed the current height limit.

- For zones with height limits under 85 feet, the height limit would increase by two or three stories and up to 1.5 additional FAR. For development that would not exceed the current height limit, 0.5-1.0 additional FAR would be available, depending on the zone. The remaining additional permitted floor area in the proposed regulations would be available only for developments that exceed the current height limit (refer to Table 1).
- For zones with current height limits of 85 and 95 feet, the proposal would allow development up to 145 feet. The maximum floor area limit would increase to 7.0 FAR, with up to 1.0 FAR exempt for certain uses and subject to locational criteria. For development that does not exceed the current height limit, up to 1.0 additional FAR would be available; the remaining increase in permitted floor area in the proposed regulations would be available only for development that exceeds the current height limit (refer to Table 1). Development above 85 feet is subject to building code provisions that require higher-cost steel and concrete construction, which could affect the likelihood that future development projects will ever be proposed to use this maximum additional height.
- In zones that already allow tower development of 14-20 stories, the proposal would allow up to 4-6 additional stories of development. These zones include Commercial and Neighborhood Commercial zones with current 145- and 200-foot height limits.
- In all Commercial and Neighborhood Commercial zones, an upper-level setback of at least 8 feet would apply for any street-facing portion of a structure that exceeds the current height limit.

Single-Family zones

In single-family zones, the proposal would modify maximum density and floor area limits to allow construction of additional housing units meant to be compatible with what is allowed under existing zoning.

In SF 5000, SF 7200, and SF 9600 zones, the proposed changes to allow more affordable housing would be limited to sites that:

- 1) Have or abut a religious facility use or other use associated with or accessory to a religious facility, or
- 2) Are at least 10,000 square feet in area, if a site does not have or abut an existing religious facility use.

Under the proposal, these sites could develop to a maximum floor area of 1.0 FAR, an increase from the current limit of 0.5 FAR. The proposal would allow up to one home per each 1,500 square feet of lot area.

In Residential Small Lot (RSL) zones, the proposed changes for affordable housing would be available on all property owned or controlled by a religious organization. The proposal would increase the maximum floor area limit from 0.75 FAR to 1.2 FAR and allow up to one housing unit per 1,200 square feet of lot area (which regulates total density of dwelling units). The lot coverage limit (how much of a property can be covered with a structure) would increase from 50 percent to 65 percent. No changes are proposed to minimum yard requirements or the existing 35-foot maximum height limit, so while additional affordable housing units could be created under the proposal, the physical scale of new built structures would resemble what is allowed under current standards.

Table 2
Existing and proposed standards, SF and RSL zones

Zone	Eligibility for additional development potential ²		Current standards			Proposed standards for affordable housing on property owned or controlled by a religious organization		
	Type of use	Minimum site area	FAR	Density	Lot coverage	FAR	Density	Lot coverage ³
SF 5000, SF 7200, SF 9600	Religious facility or other use associated with a religious facility	10,000 square feet	0.5	1 unit per 5,000-9,600 sq. ft.	Lots 5,000 sq. ft. and larger: 35 percent Lots under 5,000 sq. ft.: 1,000 sq. ft. + 15 percent of lot area	1.0	1 unit per 1,500 sq. ft.	50 percent
RSL	All property owned or controlled by a religious organization		0.75	1 unit per 2,000 sq. ft.	50 percent	1.2	1 unit per 1,200 sq. ft.	65 percent

Siting and clustering requirements would apply, to limit where structures could be located on the property with respect to neighboring lots. In addition to existing yard requirements, which would continue to apply, dwelling units would be not allowed within 10 feet of any lot line or 20 feet of a lot line of an abutting single-family-zoned lot. A maximum façade length limit of 40 feet would apply within 20 feet of a lot line of an abutting single-family-zoned lot.

Except for certain large sites described below, no increase is proposed in existing maximum height limits of 35 feet for single-family zones. Development would be limited to 25 feet in height if exceeding the existing lot coverage limits of 35 percent and 50 percent, up to the proposed maximums of 50 percent and 65 percent for SF and RSL zones, respectively.

² In SF zones, either criterion (type of use or minimum site area) would make a site eligible for the proposed provisions.

³ Increase in lot coverage would be available only for development that does not exceed 25 feet in height.

Large sites in single-family zones

For large sites in SF and RSL zones owned by religious organizations and meeting certain criteria, the proposal would allow additional development capacity beyond the standards described above for long-term income-restricted affordable housing. These provisions would facilitate affordable housing on sites in single-family zones where factors like proximity to frequent transit, proximity or adjacency to higher-scale zones, or the site's size or locational characteristics provide infrastructure, access, and scale compatibility that would be suitable to accommodate greater residential density.

- In SF zones, criteria for these provisions would include a minimum lot area of at least 10,000 square feet, a current use of a religious facility or another use directly associated with a religious facility, proximity to frequent transit service or an urban village boundary, and close proximity to a larger-scale or higher-intensity zone. In such cases, additional increases in maximum height and floor area limits or other modifications of development standards to facilitate additional construction of affordable housing could be permitted. These increases would not exceed the scale of the adjacent larger-scale zone, with an upper limit of at most a height of four stories and a floor area limit of 2.0 FAR.
- RSL zones are located entirely in urban villages. In RSL zones, criteria for these provisions would include a minimum lot area of at least 10,000 square feet, a current use of a religious facility or another use directly associated with a religious facility, and close proximity to a larger-scale or higher-intensity zone. In such cases, additional increases in maximum height, floor area limits, and density limits, or other modifications of development standards to facilitate additional construction of affordable housing, could be permitted. These increases would not exceed the scale of the adjacent larger-scale zone, with an upper limit of at most a height of five stories and floor area limit of 2.5 FAR.

Seattle Mixed and Downtown zones

While most property owned by religious institutions is located in the zones described above, some sites are located in Seattle Mixed (SM) and Downtown zones. About two percent of land owned by religious organizations is located in SM zones, and two percent in Downtown zones. This amounts to about 10 acres in total.

**Table 3
 Changes in SM and Downtown zones**

Proposed standards for affordable housing on property owned or controlled by a religious organization		
Development type	Height limit increase	FAR increase
Development with height limits up to 85 feet	Up to 20 feet	Up to 1.5
Development with height limits greater than 85 feet	Up to 40 feet	Up to 3.0

SM zones are located primarily in South Lake Union, the U-District, and Uptown, with smaller SM areas in North Rainier and Interbay/Dravus. Development standards in these SM-zoned areas and in Downtown vary substantially zone to zone, with some zones regulated primarily by height, some by FAR floor area limits, and others by maximum floor plate (e.g., area per single floor) size limits or setback requirements. Further, zones that allow highrise tower development typically include distinct height limits for the podium (lower base area) and tower (upper) portions of the structure.

Given the variety and complexity of development standards in SM and Downtown zones, the proposal may allow additional density for affordable housing on religious organization-owned sites through a more generalized relative increase in height and floor area limits. For the purposes of environmental review, this analysis considers increases in height and floor area limits of up to +20 feet and up to 1.5 FAR for development where the current applicable height limit is 85 feet or less, and up to +40 feet and 3.0 FAR for zones where the current applicable height limit is greater than 85 feet.

Split-zoned sites

On eligible religious organization-owned lots located in two or more zones, the proposal would allow the development standards of the most intensive zone to be applied to any portion of the lot that comprises 30 percent or less of the total lot area, provided that no portion of the lot is located in a single-family zone. This could result in structures that are taller, have more floor area, and contain more housing units than would otherwise be allowed under existing zoning and the provisions described above. The setback requirements of the zone would continue to apply for any lot line that abuts a residentially zoned lot. Based on an analysis of parcels owned by religious organizations, this flexibility would apply on only approximately 10 split-zoned sites in the entire city, only some of which would meet the 30 percent-of-lot area measure mentioned above.

Public Comment

The proposed changes to the Land Use Code require City Council approval. Opportunity for public comment will occur during future Council meetings and hearings. The proposal is also available online and comments will be taken by e-mail.

ANALYSIS – OVERVIEW

Environmental review resulting in a Threshold Determination is required pursuant to the State Environmental Policy Act (SEPA), WAC 197-11, and the Seattle SEPA Ordinance (Seattle Municipal Code (SMC) Chapter 25.05).

The following report describes the analysis conducted to determine that the proposal is not likely to result in *probable significant adverse environmental impacts*. This threshold determination is based on:

- the language of the proposed amendments and related contents as described above;
- the information contained in the *SEPA checklist* (dated February 8, 2021), including annotations made by SDCI staff;
- review of materials prepared as background information about the code amendments, prepared by City staff; and
- the experience of the SDCI analyst in reviewing similar documents and actions.

ELEMENTS OF THE ENVIRONMENT

Short-Term and Long-Term Impacts

A. Natural Environment

Earth, Water, Water Quality, Environmental Critical Areas, Plants/Animals/Fisheries/Marine Life

This non-project proposal would not generate significant adverse impacts for these natural environmental elements, at a programmatic non-project level or in its potential for cumulative impacts related to future development influenced by the proposal.

Seattle is mostly urbanized in its development patterns, but it also has retained greenbelts, hillsides, stream, river, bay, and lake environments with diverse kinds of plant, animal, fish and marine habitats. This includes many shoreline edges hosting birds, fish, and other marine life.

- Wildlife on land largely includes those species habituated to urban areas and fragmented vegetated areas in the city, with common types including squirrels, opossum, coyotes, and a variety of bird species including eagles. Threatened, protected, or endangered species that could be present near future development include heron, and salmon in locations downstream via natural drainages.
- Seattle has numerous soil types, including mineral soils dominated by clay, silt, or sand, as well as organic soils such as peats and mucks. No agricultural soils or prime farmland are located within the Seattle corporate limits. As a densely urbanized area, much of Seattle's native soils have been extensively altered by filling, grading, and other activity.
- The Seattle area is known to be in an active seismic area, as is the entire Puget Sound region. The City's geologically hazardous areas are defined by SDCl as environmentally critical areas (ECAs). Unstable soils and surfaces occur primarily in two contexts: 1) steep slopes and landslide-prone areas, where a combination of shallow groundwater and glacial sediments deposited in layers with variable permeability increases the risk of landslides; and 2) areas of fill or alluvial soils where loose, less cohesive soil materials below the water table with potential for liquefaction during earthquakes.
- Most of Seattle is located within the Lake Washington/Cedar/Sammamish Watershed. The Duwamish Waterway and Elliott Bay are part of the Green/Duwamish and Central Puget Sound Watershed. Seattle's surface waters include marine areas (Puget Sound), rivers, lakes, and creeks. Rivers and creeks include but are not limited to the Duwamish waterway, Longfellow, Fautleroy, Taylors, Thornton, and Pipers Creek. Freshwater lakes include the Lake Union/Ship Canal, Green, Haller, and Bitter Lakes and numerous ponds and wetlands.

This non-project proposal would result in no direct impacts to plants, animals, fish, or marine life because it does not directly propose development. Regarding the potential for cumulative impacts due to future development that could occur indirectly related to this proposal, the following observations are made:

Earth, Water, Environmental Critical Areas

Seattle has a variety of different surface drainage control systems, which in portions of the City include directing surface drainage toward natural drainages like local creek systems. In some places, stormwater runoff and sanitary sewage can be transported in the same pipes, and there are separate pipe systems for

these flows in other areas. The regulatory objectives for areas with these systems include avoiding and limiting the potential for uncontrolled stormwater runoff and washoff of surface soils and pollutants, which can damage or degrade the environment.

The proposal to accommodate more future development in religious properties could lead to instances where new buildings are added while existing buildings are retained, or it could lead to redevelopment through demolition of existing structures and constructing new buildings. The relevant properties affected by this proposal (see page 16 of the Director's Report) are sprinkled throughout the city, with somewhat greater concentrations of these properties in certain vicinities such as the Central District, southeast Seattle, and parts of West Seattle.

A great majority of these sites are located in already-developed portions of Seattle's urban environment. While local conditions can vary greatly within the affected areas, a typical condition in already-developed areas includes the presence of improved streets and other impervious surfaces, past grading of lots and clearing of original vegetation, and existing buildings on and near affected sites. Localized portions of already developed properties can include steep slopes, which often are limited in size and may already be controlled by rockeries or concrete bulkheads. Occasionally, properties may be located on or near sloping topography that may have trees or other vegetation in varying degrees of age and stability. The City's information resources include mapping of areas known or believed to contain ECA resources. If mapped, the City typically requires permit reviews to include evaluation and protection of the ECA resources.

This analysis identifies only a minor potential for differences in on-site disturbance of soils and vegetation with future development under the proposed regulations. There would be a minor potential for these actions to create increased disturbances of earth (grading, fill, excavation) that in the worst-case could cause transport of soil off-site through stormwater runoff and potentially contribute to downstream adverse impacts on sensitive resources and critical areas such as wetlands, streams, other marine resources, landslide hazard areas, and steep slopes.

The application of ECA regulations would tend to prohibit or limit the potential for direct and indirect impacts on these critical areas from disturbances due to development activities. And, the implementation of the City's protective best-management-practice requirements, including those for construction sites, which limit soil washoff and transport, would tend to avoid and minimize the potential for adverse earth and water environmental impacts to occur in downstream drainage locations.

Post-construction, incrementally more intensive residential land uses might generate indirect potential for adverse impacts to ECAs if they are present in the site vicinity. Examples of such impacts might include destabilization of certain steep slopes or degradation of wetland biological value due to proximity of neighboring land use activities. This is not likely to generate significant adverse impacts because the degree of increase in land use intensity under the proposal is only slightly-to-modestly greater than could occur under today's regulations in areas near ECAs. Existing ECA regulations would continue to regulate any development and activities on a property with or near an ECA and thus greatly limit the potential for adverse environmental impacts.

Plants, Animals, Fish, Marine Life

This non-project action would result in no direct impacts to plants, animals, fish, or marine life because it does not directly propose development or construction. The proposal could indirectly affect plant and

animal life by accommodating future development that is incrementally larger, taller, or more intensive in use. This increment of additional development could involve disturbing or covering more of the sites that are affected by the proposal with future new development.

This includes in single-family zones where the proposal includes an increase in allowed lot coverage, where a significant portion of Seattle's tree canopy is found, and where a large share of the land owned by religious organizations is located. Seattle's single-family zones tend to have greater tree canopy coverage, and properties in these areas may be more likely to have plants, trees, and vegetation that provide habitat for various animals. Minor adverse impacts to vegetation, tree canopy, and animal habitat could result from future development benefiting from the proposed increases in lot coverage and residential density. A decrease in vegetation and animal habitat could occur on sites owned by religious organizations that elect to develop underutilized portions of their property that may be currently vegetated. Existing regulations such as those addressing tree protection (Chapter 25.11 of the Municipal Code) and Green Factor regulations addressing future development landscaping, would also play a role in limiting the potential for adverse impacts to trees and ecological functions.

Single-family zones include properties near Seattle's shorelines where a greater intensity of development could have adverse impacts on the shoreline environment and marine life. However, protections in the Shoreline Master Program (SMC Chapter 23.60A) would continue to regulate development in the Shoreline District. Single-family zones also include parks, open spaces, and undeveloped greenbelts that have substantial vegetation and tree canopy and provide ecological functions — but these sites would generally not be affected by the proposal because additional development potential is available only on single-family sites associated with a religious facility.

Overall and in aggregate, impacts to plants, animals, fish, and marine life are likely to be minor because the proposal's indirect accommodation of additional lot coverage and density in future potential development would be relatively limited in magnitude, available only on the limited number of sites that are owned or controlled by a religious organization and only for the development of long-term affordable housing. These are sprinkled around the city, mostly in already-developed areas and with few areas of concentration or proximity to known sensitive environmentally critical areas. These include a majority of sites that have already been developed, which tends to constrain their ecological value as plant and animal habitats.

Air Quality, Noise, Energy, Natural Resources Depletion, Environmental Health

This non-project proposal would result in no direct adverse or significant adverse impacts to these environmental elements because it does not directly propose development. Similarly, this analysis identifies no adverse or significant adverse indirect or cumulative environmental impacts of this kind.

Air Quality

The proposal could indirectly affect air quality by accommodating future development that is incrementally larger and taller than allowed under existing development standards. This increment of additional development could result in minor adverse but not significant adverse impacts commonly associated with infill development and residential living in urban areas, such as increases in pollutant emissions from vehicle trips, heating fuel use, and electricity consumption associated with new buildings.

The proposal could indirectly accommodate future construction activity that is incrementally longer and/or more intensive compared to developments that would be allowed under the current land use code. This could result in increments of additional air emissions due to construction (such as those related to grading, truck movements, and equipment operations) that are likely to be minor adverse but not significant adverse impacts. The application of City requirements addressing construction practices would tend to limit the worst-case magnitude of potential air emission impacts that could occur during construction.

Net increases in future development potential might generate net increases in greenhouse gas emissions from affected properties. However, these conceptually could be at least partially offset by reductions in per-capita vehicle trips for commuting, because the proposal would allow more residents to live in areas close to employment opportunities, near amenities, and well served by transit. Net increases in greenhouse gas emissions would represent a probable adverse but not significant adverse impact due to the limited applicability of the proposal to future development within the context of Seattle's entire expected future amount of growth in coming years and decades.

Noise

The proposal could indirectly affect noise levels by accommodating future development that is incrementally larger and taller than allowed under existing development standards. This increment of additional development could result in minor adverse but not significant adverse impacts associated with infill development and residential living in urban areas, such as increases in noise levels due to new or increased residential occupation on religious properties.

Properties owned by religious organizations may create a variety of typical noise conditions depending on what activities are occurring or would occur with future development. Example uses may include religious events and services, educational activities, and child care activities. Also, these properties may have variable kinds of relationships to neighboring uses; some may have facilities with greater lot coverage and limited setbacks to adjacent residential properties, which may fit in with the prevailing lot-size and development character in many neighborhoods. Other religious properties may be larger or have less site coverage and buffers such as trees or fences. The variety in activities and in sites' relationships to adjacent properties means there could be instances where spillover noise may already occur intermittently. This could mean that added residential development (and/or development with limited-size non-residential uses in Lowrise zones) could incrementally add new noise sources to these properties, which may lead to increased noise levels with future development. Or, some existing religious facilities may be demolished and replaced with new residential uses or mixed-uses in multifamily or commercial zones, which could generate new kinds of noise, generally typical noise generated by multifamily residential uses or limited-size non-residential uses.

Any such new uses would be subject to meeting the City's noise standards in Chapter 25.08 of the Municipal Code. These levels (55 dBA decibels daytime and 45 dBA nighttime in residential zones) are relatively strict in limiting noises that could be disruptive or annoying, and are set at levels to reasonably accommodate typical daytime residential-use, while reserving the City's role to enforce situations that generate complaints and violate the City's noise limits and requirements. Construction activities may be louder than those limits, but only occurring during daytime hours. Future development proposals would be subject to future environmental review where applicable, meaning site-specific noise impacts, relationships to surrounding uses, and possible noise mitigation would be evaluated on a project-by-project basis.

Energy and Natural Resource Depletion

As a non-project action, the proposal would not deplete energy or natural resources because it does not directly propose development or construction. The proposal could indirectly affect energy and natural resource consumption by allowing future development that is incrementally larger, denser, or more intensive than allowed under existing development standards. This could result in an impact on energy and natural resources due to incrementally greater energy and resource use for construction and operation of the future development. This potential impact is likely to be minor because this type of incrementally larger or more intensive development is expected to occur infrequently (in the context of overall citywide development volumes) given the limited number of sites eligible for the proposed provisions; and because energy and resource use for future development related to this proposal would remain generally consistent with other types of construction, development, and operation in Seattle.

New development will continue to be subject to energy efficiency requirements in the Seattle Energy Code, which have been recently updated with more stringent requirements that ensure greater efficiencies meeting or exceeding requirements of State law. To the extent that the proposal could indirectly encourage greater residential density on a given site or in a given area, increases in energy use for construction and/or operation of the development could be at least partially offset by allowing more people to live near a mix of uses, businesses, and transit service that they can reach by walking or biking, thereby reducing energy and resource use associated with private vehicle travel.

Environmental Health

The proposal is a non-project action that does not include direct construction or development that could result in environmental health hazards, exposure to toxic chemicals, risk of fire and explosion, spill, or creation of hazardous waste. The proposal could indirectly affect environmental health by accommodating future development that, in some instances, would lead to demolition or renovation of old existing buildings used for religious, institutional, or residential uses. These old buildings could have hazardous substances in them, including asbestos in insulation, floors and ceilings; abandoned oil tanks; or other residual contaminants. If development occurred on properties formerly occupied by certain kinds of non-residential uses that used hazardous substances (automobile-oriented, dry-cleaning or other commercial or manufacturing uses, for example), these substances could be present within site buildings or as soil contamination. This could be identified through Level 1 environmental site reviews for these past uses and conditions. If present, these substances would need to be handled according to current best-practices and requirements to abate the hazardous conditions. These would represent a probable adverse but not significant adverse impact indirectly related to the proposal.

Potential risks from exposure to hazardous chemicals or conditions associated with future development projects related to this proposal would be addressed through regulation and/or project-specific environmental permit review.

B. Built Environment

Land and Shoreline Use, Height/Bulk/Scale, Housing, Relationship to Plans and Policies

As a non-project action, the proposal would result in no direct development or adverse environmental impacts. Although the proposal would change development requirements in ways that would accommodate and perhaps encourage indirect future development, it is also unlikely to lead to significant indirect or

cumulative adverse impacts to these environmental elements. The proposal would modify land use rules for specific types of property and development relating to properties owned or controlled by religious organizations. The proposed changes would apply citywide and in most zones, subject to certain eligibility criteria described in Section A, Question 11 of the environmental checklist and in Appendix A.

Overall degree of land use change

For the purposes of analyzing potential adverse land use impacts, the amount of development likely to result from the proposal is partly a product of the amount and distribution of land owned by religious organizations. As illustrated in Section A, Question 12 of the environmental checklist, and detailed in Appendix A, religious organizations own about 395 acres of land, based on best available property ownership data. This comprises less than one percent of all land in Seattle. As described in Appendix A, most of this land (about 61 percent) is developed with religious facilities and almost 30 percent with other structures, which could make redevelopment less likely if these buildings are actively in use. About 10 percent of this land has an existing use described as vacant in King County records. Even if a substantial portion of land owned by religious organizations were redeveloped in the near term to the largest extent possible under this proposal, it would represent a relatively small share of development in Seattle, which in recent years has added about 10,000 new housing units annually.

The proposed modifications to maximum height and floor area limits would also be available for property that eligible religious institutions may acquire in the future. It is not possible to identify specific additional sites that these organizations could own or control in the future, but it is unlikely that this would be a common phenomenon. Many or most religious institutions tend to have limited funds available for land acquisition, and many already have more land than they need to perform their organizational functions. The high cost of land in Seattle makes it further unlikely these organizations would frequently or to a substantial degree acquire additional property. Many faith institutions, including for example several churches in Seattle's Central Area, have in recent years sold their property and relocated outside the city. For these reasons, while other sites beyond those currently owned by religious organizations and identified in Appendix A could theoretically someday become eligible for the proposed development standards, this is likely to be an uncommon consequence with only a minimal-to-minor potential for generating additional extents of adverse development-related environmental impacts.

The incremental amount of additional development expected to result from the proposal is also a function of limited public funds available for affordable housing. Most income-restricted affordable housing developed in Seattle includes funding from the Seattle Office of Housing, which at least once per year issues a Notice of Funding Availability (NOFA) for its Rental Housing Program. The NOFA describes specific funding priorities and requirements for its various fund sources, of which the Seattle Housing Levy is typically the largest. (A separate NOFA for affordable homeownership projects is published twice each year.) Since 2017, the Rental Program NOFA has awarded between \$78 million and \$110 million to fund construction and preservation of affordable housing. The largest investment to date came in 2019, when the City funded creation of 1,944 new affordable rental homes across 13 buildings.

Together, these factors would constrain the potential incremental amount and timing of additional future development that this proposal could yield. It is likely that religious property owners seeking to redevelop their sites with affordable housing would pursue City funding, a competitive process that is regularly oversubscribed. Further, the additional development potential provided by the proposal is available only on a limited number of sites that fulfill certain criteria.

In Single-Family zones, the proposal's enhanced development capabilities would apply only on sites of at least 10,000 square feet or on other sized sites that are associated with a religious facility or use. This limits the scope of the proposal to only a fraction of properties in SF zones. About 232 acres of property currently owned by a religious organization meet one of these criteria. A religious organization could assemble multiple smaller properties to achieve the minimum site area, provided the site is also associated with a religious use. Development under the proposal would also be subject to clustering requirements that increase the separation between new and existing structures, at least partially offsetting the potential for adverse land use impacts in single-family zones. Overall, these factors mean the potential for adverse land use impacts from the proposal in single-family zones is likely to be minor since only a limited number of sites could be affected and they are generally well dispersed throughout single-family zones and not concentrated in a particular area.

As described below, this analysis finds that adverse impacts could occur to land use and development patterns and height, bulk, and scale, due to factors including: the allowance of small-scale commercial uses in multifamily residential zones; additional forms of housing in single-family zones; and a larger scale of development in multifamily and mixed-use zones. These represent probable adverse but not significant adverse impacts because a relatively limited number of sites are eligible for the proposed provisions and the pace of future development related to the proposal is likely to unfold gradually. Below is an examination of anticipated land use impacts in more specific and localized contexts.

Use and development patterns

Under the proposal, increases in maximum height and floor area limits could result in greater housing density and taller, larger structures on properties. Denser future development and increased activity could result in slightly greater levels of adverse land use impacts compared to future development under existing land use standards. The proposal's net increases in potential impacts would be consistent with the characteristics of the affected properties' urban contexts. Meaning, the degrees of increased development potential would tend to be greater in already-denser environments such as urban centers and urban villages where there are more intensively zoned properties, and lesser degrees of change and potential for impacts in places with less-dense zoning and existing development patterns. In mixed-use zones that already allow various uses, including multifamily housing, retail, office, and other commercial uses, the existing mix of allowed uses and overall development pattern would not change.

In multifamily lowrise residential zones, the proposal would allow small ground-floor commercial spaces, which would need to meet standards that already apply in Residential-Commercial zones (SMC Chapter 23.46). To the extent that such non-residential uses are provided in future development, this could result in small-scale non-residential uses in zones that otherwise do not allow them, introducing a greater variety of uses in the general vicinity of a given future development. These uses potentially could result in impacts in the form of added noise, increased pedestrian and vehicle trips, and other characteristics of non-residential activity. This impact would represent an adverse but not a significant adverse impact because standards for size, location, and visibility of the non-residential uses would tend to limit the amount of activity it generates, and because sites eligible for the provisions of this proposal would tend to be dispersed throughout the city. While the introduction of small-scale non-residential uses could yield incrementally greater vehicle traffic in the immediate vicinity of a future development, some of this impact would be at least partially offset by a reduction in vehicle trips that local residents otherwise would be likely to take to reach such services and amenities.

Impacts in SM and Downtown zones would be similar but more likely to be minor since only three percent of property owned by religious organizations is located in these zones, which are the most highly developed, high-intensity, and urbanized parts of Seattle. The proposal would not modify the range of allowed uses or likely significantly alter the existing development patterns in SM and Downtown zones. Most of these zones already allow a range of uses that future development indirectly related to the proposal would maintain. Eligible sites in these zones generally already have capacity for redevelopment under existing zoning. Therefore, the proposal would not be likely to significantly affect the decision of whether a site eventually is redeveloped, but could result in incrementally larger development and greater residential density if it redevelops and could encourage affordable housing as a use. Downtown and most areas with SM zoning already have many affordable housing developments, so the proposal would likely contribute to maintaining a consistent, compatible mixed-use land use pattern in these zones.

In single-family zones, the proposal would continue to allow only residential development, though the type and form of housing could vary from current development patterns. In RSL zones, various housing forms are already allowed, including detached homes, attached townhouses and rowhouses, and stacked flats. The proposal would maintain this variety and allow a greater number of homes to be developed on a given site by increasing FAR, density, and coverage limits. Denser affordable housing development could result in incrementally more intensive land use but would not depart from existing predominantly residential use patterns. A wider range of housing types would be allowed, including detached and attached forms of ownership and rental homes. Housing units could be configured in various forms, including clustered housing, side-by-side townhouse or rowhouse units, or stacked units. While the scale of overall development allowed on a site would not change substantially from existing standards, the resulting development pattern and form could depart from the regular pattern found in many SF zones with a single detached house on each lot. This analysis concludes these cumulative effects on future development indirectly related to the proposal would represent an adverse but not significant adverse impact due to the relatively modest degree of increase in probable development intensity in these zones; and also because such development would occur gradually and only on a limited number of eligible sites that are dispersed throughout Seattle.

Whether in Single-Family or other zones, while the affected properties are sprinkled relatively evenly around the city (see page 16 of Appendix A), there are a few sectors of the city with a somewhat greater concentration in numbers of affected properties. These include the Central District, the southerly half of Southeast Seattle, and the Junction vicinity and southerly portions of West Seattle. To a lesser extent, this also occurs in areas such as Ballard/Crown Hill, and Lake City. If the proposal does lead to increasing amounts of religious property conversions or expansions over time, the concentrated number of affected properties in these vicinities could contribute to a somewhat greater cumulative amount of land use change over time through future development on religious organization owned properties. This might include adjusted programming of religious uses and related functions (like education, religious programs, services, and child care), and/or their displacement by new primarily residential uses.

Height, Bulk, and Scale

Multifamily and mixed-use zones

The proposal could result in changes to the height, bulk, and scale of some future development on certain sites throughout Seattle. On eligible properties, new buildings could be somewhat larger and taller than other recent or existing development in the vicinity, meaning increases in probable height and bulk in future development in varying degrees depending on the level of change proposed by zone category. The proposal

increases height and floor area limits but does not modify setback requirements, so new buildings eligible for these provisions could be taller but would occupy a similar footprint as otherwise allowed. The additional height of new buildings could result in greater shading of nearby public rights-of-way or open spaces.

While the proposal generally applies citywide in all multifamily and mixed-use zones, only a limited number of properties are eligible. Consequently, eligible properties which redevelop to the proposed standards could achieve a scale of development that exceeds existing or potential new development on adjacent and nearby sites. This could create a more varied development pattern in terms of building form and scale.

Multifamily and mixed-use zones typically abut other zones, with varying degrees of transition between zones of different scales. In certain instances, the proposal could result in steeper or sharper transitions in scale to adjacent smaller-scale zones. For example:

- A Lowrise 1 zone and adjacent single-family zone currently have the same height limit, but under the proposal, future redevelopment on the Lowrise property could be one or two stories taller than the adjacent single-family development.
- A block partially zoned for mixed-use with 40-foot height limit (such as an NC2-40 zone) and partially zoned Lowrise 1 could have a height difference of one story under current standards, but approximately up to four stories under the proposal (the difference between a 75-foot height limit in the proposed NC2 zone and 40-foot height limit in the proposed LR1 zone).

In Commercial and Neighborhood Commercial zones with current height limits of 85 or 95 feet, the proposal would allow up to six additional stories compared to existing standards. This could result in a larger scale and different form of development, and sharper scale changes comparing between future and existing development or comparing with adjacent lower-scale zones. This could create an adverse but not significant adverse impact because the resulting development would have a similar overall form as otherwise currently allowed or, if using the maximum allowed height, would be required to have a narrower form that partially mitigates the impacts of an increase in bulk and visual prominence of a taller structure; and because the proposal includes a new upper-level setback requirement for portions of the structure that exceed the existing height limit. This analysis also notes that only approximately four properties in the city appear to meet the criteria for this kind of future development, so this level of impact may never occur or only in a few instances.

Impacts in SM and Downtown zones would be similar to those described above for other mixed-use zones. The proposal would increase height and FAR limits in SM and Downtown zones above current standards. Specific increases would vary by zone and the scale of development allowed but could include up to four stories of height and an increase of 3.0 FAR. On the limited number of religious organization-owned sites eligible for these provisions, these changes could result in taller and larger buildings that might generate adverse height, bulk, and scale-related impacts. Incrementally greater shading of nearby public rights-of-way or open spaces could occur. The magnitude of visual changes due to the proposal's allowances for increased building bulk and scale, would create a greater degree of variety in height and bulk of buildings in the already somewhat intensively used urban-center and urban-village environments of these zones. Overall, given this existing relatively intensive existing character in affected SM and Downtown zones, and the relatively limited number of sites eligible for height and FAR increases, the proposed differences of 2-4

additional stories can be accommodated without generating significant adverse height, bulk, and scale impacts.

Appendix A includes several urban design scenarios that illustrate potential scale changes between existing development and potential new buildings developed to the proposed standards. This analysis finds that adverse height, bulk, and scale impacts could occur from the proposal's cumulative effects in influencing future development outcomes, but they are not likely to be significant adverse impacts because larger-scale development would occur gradually over time and tend to be dispersed across a limited number of eligible sites. In mixed-use zones, a proposed upper-level setback, defined as 8 feet in depth, would apply to all portions of a new building that exceed the zone's height limit would partially mitigate the potential magnitude of visual and shading bulk- and scale-related impacts of new buildings taller than surrounding development by requiring upper stories to recede from public view at street level. Some new development under the proposal would require issuance of a Master Use Permit (MUP) and be subject to project-level SEPA analysis and the City's Design Review program. This could also help to reduce and minimize these potential visual and shading bulk- and scale-related impacts of added height and bulk in future buildings.

On eligible religious organization-owned lots that are located in multiple zones, the proposal would allow the development standards of the most intensive zone to be applied to any portion of the lot that comprises 30 percent or less of the total lot area, provided that no portion of the lot is located in a single-family zone. This could result in structures that are taller, have more floor area, and contain more housing units than allowed under existing zoning or under the provisions described above for sites in single zones. In the immediate vicinity of these sites, this could result in an adverse impact in the form of incrementally greater height, bulk, and scale impacts, additional shading of neighboring properties, and/or a more varied development pattern in terms of building form and scale. The setback requirements of the zone would continue to apply for any lot line that abuts a residentially zoned lot, which would at least partially offset the impact of larger-scale development. Based on an analysis of parcels owned by religious organizations, this flexibility would apply on only approximately 10 split-zoned sites across the city. This estimate does not consider the 30 percent lot area limit, which would likely further reduce the number of sites that could use this provision. Because this specific split-zone provision would apply to very few sites, and more generally because development using the proposed land use tool is likely to require limited and finite publicly resources for affordable housing, the provision is likely to have a minimal overall impact on land use and building height/bulk/scale. Therefore, this analysis concludes that this provision could result in a potential adverse but not a significant adverse impact.

Single-family zones

Under the proposal, development on property owned by religious organizations in single-family zones could be somewhat larger and bulkier than zoning standards would otherwise allow. This could result in greater visual bulk of development. No change is proposed to existing height limits; in some cases, a lower height limit would apply to development that uses additional lot coverage, which would at least partially mitigate the scale of future new structures.

In RSL zones, the proposal would allow development that covers up to 15 percent more of the site. The proposed increase in the FAR limit would allow a greater amount of floor area to be constructed, which could result in minor adverse impacts of added bulk in future new development. Housing development under the proposal could appear slightly bulkier than surrounding development, which would be expected to include a mix of detached houses and attached housing built to a similar height, smaller scale, and lower

density. In SF zones, the proposal would allow development to occupy up to 15 percent more of the site provided it does not exceed two stories. This could result in minor visual bulk-related impacts from structures that appear visually wider and bulkier, but at a lower height than otherwise allowed. The proposal would also allow a greater number of homes subject to the same lot coverage as otherwise allowed and within a zoning envelope similar to existing development. Clustering standards would require new structures to be further from adjacent properties than otherwise required by yard standards, which would partially offset the visual effect of bulkier structures.

For certain large sites in SF and RSL zones, the proposal could result in larger-scale development than otherwise allowed, if the development is located near other higher-intensity or larger-scale zones and development. This could include taller structures that exceed the existing height limit, up to an upper limit of at most four stories in SF zones or five stories in RSL zones. This additional development potential could be available provided that the adjacent zoning and/or nearby existing structures meet or exceed four or five stories of height, respectively. This provision could result in an adverse impact but would not constitute a significant impact because these criteria would restrict its use to situations where resulting larger-scale development would be more compatible with the surrounding existing land use context than would result from the development standards that otherwise apply.

Overall, while the proposal would allow a wider range of housing types and greater residential densities compared to existing zoning, development under the proposal would generally occur on relatively large sites already occupied with a religious facility. In most cases, this existing use is already a departure from the pattern of a single detached house on a lot of roughly 4,000-6,000 square feet in size. The proposal would not be expected to frequently result in the conversion of detached single-family houses into a different, more intensive residential use, but rather the reuse of underdeveloped property (like a surface parking lot) or redevelopment of a religious organization's site that typically will already differ from the established development pattern. Therefore, this analysis finds the proposal could result in an adverse impact to height, bulk, and scale in single-family zones, but this would not represent a significant adverse impact because such development would occur relatively infrequently and in a dispersed pattern on a limited number of eligible sites, and because existing structures on eligible sites may often already depart from the existing built environment context.

Housing

The proposal would result in no direct impacts to housing since no construction is proposed. The proposal would implement land use rules that encourage creation of long-term, income-restricted affordable housing through future development. All future housing developed that is (indirectly) related to this proposal would be reserved for at least 50 years for households with incomes at or below 80 percent of area median income. This type of future development would be expected to partially ameliorate Seattle's acute housing need and is not likely to worsen existing housing affordability challenges. Adverse housing impacts could occur if the proposal indirectly leads through future development to the demolition of existing housing, but this is unlikely given the type of sites eligible for the proposed development standards, which are properties owned or controlled by religious organizations, very few of which are currently in use for housing. Even if existing housing were demolished in a manner indirectly related to this proposal, the resulting future development would necessarily include regulated affordable housing at likely a much larger scale and amount than the number of homes demolished.

Housing impacts in single-family zones are not likely because more than 60 percent of properties owned by religious organizations in these areas have religious facilities and are unlikely to include existing housing. Even if existing housing were demolished in a manner indirectly related to this proposal, the resulting future development would necessarily include regulated affordable housing at likely a much larger scale and amount than the number of homes demolished. While new development in single-family zones, particularly SF zones, tends to be ownership housing, the proposal could indirectly encourage future development that would increase the likely presence of affordable rental homes.

Consistency with Comprehensive Plan policy

The proposal responds to State rules that require the City to adopt codes that accommodate increased development capabilities on properties owned or controlled by religious organizations. The proposal aims to support housing affordability — an objective identified in and supported by several Comprehensive Plan goals and policies — while maintaining land use compatibility with existing development. The Comprehensive Plan provides the following guidance related to housing affordability:

Several policies and goals support increasing the supply, availability, and diversity of affordable housing opportunities throughout the city. These include: H1.7, H2.4, H3.3, H3.5, H5.2, H5.3, H5.6, H5.7 and Housing Goal G5. Infill development with residential uses is supported by Land Use Goal G1 and Growth Strategy policy GS 1.22.

Addressing non-residential uses in residential zones:

***LU 2.4** Limit nonresidential uses in residential zones to those necessary or highly compatible with the function of residential neighborhoods.*

Relationship: For affordable housing developments on eligible properties owned or controlled by religious organizations, the proposed provisions would allow small nonresidential uses, such as office, arts and cultural space, or neighborhood-serving retail, in multifamily zones, subject to existing standards for noise, signage, and size limits in Chapter 23.46 for Lowrise and Midrise Residential–Commercial zones. These standards would encourage compatibility with the function of residential neighborhoods. Nonresidential uses would not be allowed as part of such developments in single-family residential zones.

Special Uses: Public Facilities and Small Institutions

Comprehensive Plan guidance also address institutions and historic preservation, which both pertain to properties owned by religious organizations:

***LU 3.2** Allow public facilities and small institutions to depart from development standards, if necessary, to meet their particular functional requirements, while maintaining general design compatibility with the surrounding area's scale and character. Require public facilities and small institutions to adhere to zoned height limits, except for spires on religious institutions. Consider providing greater flexibility for schools in recognition of their important role in the community.*

Relationship: The proposal would modify development standards for property owned by religious institutions, but the changes would apply primarily to affordable housing use and fulfill requirements in Substitute House Bill (SHB) 1377. Standards for functional requirements of religious organizations

would largely remain the same. The proposal would add some flexibility for small-scale uses that support the mission of religious organizations, such as office use in multifamily residential zones, subject to certain size limits and design requirements. Institutional uses would continue to be subject to existing zoned height limits.

LU 3.3 Allow standards to be modified for required off-street parking associated with public facilities and small institutions based on the expected use and characteristics of the facility and the likely impacts on surrounding parking and development conditions, and on existing and planned transportation facilities in the area.

Relationship: The proposal maintains off-street parking requirements for institutions. Development of affordable housing is generally not subject to minimum requirements for off-street parking. The proposal would not modify this existing provision.

LU 3.4 Avoid clusters of public facilities and small institutions in residential areas if such concentrations would create or further aggravate parking shortages, traffic congestion, and noise in the area.

Relationship: The proposal would not modify where religious institutions are allowed in residential areas.

Policies addressing single-family zones include: SF7.2, SF7.3, SF 7.8, SF7.9, SF7.10 and SF7.12.

Policies addressing historic preservation include: LU14.1, LU14.3, LU14.4, LU14.5, LU14.7, and LU14.9.

See pages 32-37 of the environmental checklist for a full discussion of applicable and relevant policies.

Historic Preservation and Cultural Preservation

Historic Resources and Preservation

Seattle contains a number of landmarks, properties, and districts that are listed on, or proposed for, national, state, and local preservation registers. In addition, while Seattle today comprises a highly urbanized and developed area, it is also an area with potential for the presence of cultural artifacts from indigenous peoples.

The proposal would indirectly accommodate additional future development that could potentially result in adverse impacts to historic or cultural sites and buildings, or at sites or buildings that are as-yet undesignated as historic or cultural landmarks but potentially could be designated in the future. The following table is an inventory of properties owned by religious organizations that include a designated landmark.

Existing regulations for historic preservation in Title 25 of the SMC would continue to apply to any redevelopment of a landmarked religious facility. These regulations provide for a variety of possible outcomes, which could include accommodating reuse of historic structures, their full protection, or new development that could preserve historic portions of landmarked sites or buildings. This would depend on the deliberations of relevant boards. Given the strength of these regulations and policies, the proposal would not create a new permitting obligation or risk of loss of a historic or cultural site or landmark where it

otherwise could not occur. Therefore, the proposal would not negate existing protections for designated landmarks.

Property name	Address	Property owner
Seattle Buddhist Church	1427 S Main St	SEATTLE BUDDHIST CHURCH
Old Georgetown City Hall	6202 13th Ave S	NEIGHBORCARE HEALTH
Church of the Blessed Sacrament and Rectory	5041 9th Ave NE	PRIORY OF BLESSED SACRAMENT
St Spiridon Russian Orthodox Cathedral	400 Yale Ave N	ST SPIRIDON ORTHODOX CATHE
Immanuel Lutheran Church	1215 Thomas St	COMPASS-CASCADE
Mt Baker Presbyterian Church	3201 Hunter Blvd S	MT BAKER PK PRESBYTERIAN CH
Seattle Japanese Language School	1414 S Weller St	NIKKEI HERITAGE ASSOCIATION
Mount Zion Baptist Church	1634 Reverend Dr. S. McKinney Ave	MOUNT ZION BAPTIST CHURCH
Seventh Church of Christ (former)	2555 8th Ave W	SEATTLE CHURCH OF CHRIST
First Covenant Church	1500 Bellevue Ave E	FIRST COVENANT CHURCH
Temple de Hirsch Old Sanctuary	1500 E Union St	TEMPLE DE HIRSCH SINAI
Seattle 1st Baptist Church	1121 Harvard Ave	FIRST BAPTIST CHURCH
Beacon Hill 1st Baptist Church	1607 S Forest St	BEACON HILL FIRST BAPT CH
University Presbyterian Church "Inn"	4555 16th Ave NE	UNIVERSITY PRESBYTERIAN CH
Fauntleroy Community Church and YMCA	9260 California Ave SW	FAUNTLEROY CHURCH
St James Cathedral, Rectory / Site	9th Ave / Marion St	CCAS PROPERTY & CONST
New Age Christian Church	1763 NW 62nd St	INTERFAITH COMMUNITY CHURCH
Bethany Presbyterian Church	1818 Queen Anne Ave N	BETHANY PRESBYTERIAN CHURCH
St Nicholas/Lakeside School	1501 10th Ave E	ST MARKS CATHEDRAL
St Joseph's Church	732 18th Ave E	CCAS PROPERTY & CONST
St Nicholas Russian Orthodox Cathedral	1714 13th Ave	ST NICHOLAS RUSSIAN CHURCH
1st African Methodist Episcopal Church	1522 14th Ave	FIRST A M E CHURCH

Overall, about three percent of properties owned by a religious organization includes a landmarked structure.

Some properties owned by religious organizations include relatively older structures that, while not designated as landmarks, may potentially be designated as historic landmark resources at a later date. Based on King County Assessor data, at least 14 percent of properties owned by a religious organization have a structure built before 1970. Some additional properties may have a pre-1970 structure, but the Assessor's data on year built may reflect newer structures on the property.

The proposal includes height and FAR increases in zones located in nationally and locally designated historic districts. Development in these areas would continue to be subject to historic preservation regulations in SMC Title 25 (and potentially other regulations in Title 23 and other Titles) and review by the respective preservation board. Currently, less than a dozen properties owned by religious organizations appear to be located in historic districts according to data from the King County Assessor.

Impacts potentially could occur from taller affordable housing development in a historic district if it would be evaluated and concluded to be incompatible with the surrounding historic scale of development. This would likely constitute an adverse but not significant adverse impact given the relatively small number of properties eligible for the proposed provisions located in historic districts, because existing historic preservation regulations and SEPA regulations would apply to development on properties with landmark

structures, and because these and other pertinent regulations and permitting processes could be used to induce or require applicants to provide building designs that address and mitigate potential compatibility-related impacts.

Cultural Resources

Most cultural sites and resources at risk from future development in Seattle are in unknown locations due to their being buried under soils, although certain vicinities such as near-shore areas are known to have greater potential for presence of such resources given past activities of indigenous peoples. As a non-project action, the proposal would not result in immediate or directly-related development actions, and so would not increase the potential for disturbance of cultural sites or resources. It would also not affect the strength of regulatory protection of those cultural sites or resources, if they are discovered, which is addressed by other State and local regulations, policies, and practices. With or without the proposal, such practices are mandated to stop construction, assess the resources, and take appropriate next steps for the cultural resources' protection or preservation.

The proposal is also not likely to result in indirect future development outcomes that would increase the potential for disturbance of cultural sites or resources. Most cultural sites and resources at risk from future development in Seattle are in unknown locations due to their being buried under soils, although certain vicinities such as near-shore areas are known to have greater potential for presence of such resources given past activities of indigenous peoples. The proposal does not include provisions that would alter the likelihood of future development occurring in any given location or type of vicinity such as near-shore areas. The range of properties that would be affected by the proposal appear to be properties on or near arterial streets and having buildings or other improvements that mean the sites have been previously disturbed. For these kinds of properties, there is perhaps a lesser likelihood that cultural resources would be unearthed in future construction activities. Still, to the extent that future development could be larger or more intensive, site grading activities might reach deeper into the ground and potentially unearth cultural resources further below the surface level.

Light and Glare

The increased size of new buildings allowed on certain sites under the proposal could incrementally increase illumination in the immediate vicinity of the development. On sites that abut arterials and other heavily used roadways, which comprise a substantial share of mixed-use zoning, the degree of additional light or glare would be minor in the context of other structures and sources of illumination in the area. In multifamily zones where the proposal could result in a change in housing type, such as from townhouse development to apartment development that is one story larger than otherwise allowed, the increase in scale and in the number of homes contained in the structure could yield a more noticeable increase in illumination. The overall potential for adverse light and glare impacts is likely to be minor since the number of sites eligible for the provisions in this proposal is relatively limited.

The proposal would also allow denser residential development in single-family zones. This could result in more illumination. Impacts related to increases in light with future development might be greater in SF zones (given their lower densities and probable lower-lit existing conditions) than in RSL zones, which are located in urban villages and tend to be near more existing sources of light. Overall, this type of impact would represent an adverse but not significant adverse impact because increases in illumination would be incremental and occur only a limited number of eligible sites.

Transportation, Parking

The proposal would not be likely to generate significant direct, indirect, or cumulative adverse impacts on transportation and parking, even though the proposal would accommodate additional floor area and residential development density in future development on affected properties.

Transportation

As a non-project action, the proposal would not result in immediate or directly-related development actions, and thus would not generate direct impacts on transportation demands or congestion. Over time, the proposal could accommodate future larger and denser residential and mixed-use development that includes more housing units than otherwise allowed under existing regulations, which would incrementally contribute to potential cumulative impacts of increased demands on transportation in any given area with affected properties, and across the city as a whole. Refer to Appendix A, page 16, which illustrates how the affected properties are distributed throughout the city.

In 2017, the City published an EIS for citywide implementation of Mandatory Housing Affordability (MHA), which contemplated upzones in all mixed-use and multifamily zones and about six percent of single-family zones. The MHA EIS evaluated potential impacts on transportation and public services and utilities from an additional increment of housing growth that could result from the MHA rezone beyond the amount studied in the Seattle 2035 Comprehensive Plan EIS. The MHA EIS evaluated several action alternatives that included citywide growth of approximately 95,000 housing units over a 20-year planning horizon. The City in 2018 also evaluated impacts on transportation and parking in single-family zones in a Final EIS for policy changes related to accessory dwelling units (ADUs). These analyses generally disclosed impacts on transportation systems, including lower-density residential areas. The findings of those EIS analyses are noted as reference points that may provide complementary information or benchmarks on relative levels of potential impacts on the City's transportation network. The following impact discussion is a stand-alone evaluation of environmental impacts of the current proposal.

Overall, potential adverse impacts on transportation and parking from the proposed non-project action and indirectly related future cumulative development on religious properties would tend to be localized and unlikely to be significant adverse impacts. This would be because the proposed additional density is available only in limited circumstances (for long-term affordable housing occurring one at a time on a limited number of properties owned or controlled by religious organizations), because eligible properties are relatively widely distributed throughout the city, and because the additional increment of residential development that could result from the proposal is minor in magnitude, within the context of overall housing growth forecasted in Seattle.

The proposal would allow additional development of long-term affordable housing on property owned by religious organizations. On eligible sites, the proposal could result in larger affordable housing developments in zones that already allow multifamily residential use, new potential for limited-size non-residential uses in Lowrise multifamily zones, and new potential for small-scale multifamily development in single-family zones. Typical multifamily dwelling units generate approximately six peak-hour automobile trips per 10 dwelling units based on City permitting experience. In a fully affordable housing development, a lower level of vehicle ownership may be probable compared to a typical multifamily development, though this could vary from site to site. The potential increase in residential density

resulting from future development under the proposal would vary depending on zone, site size, and development type. In most multifamily and mixed-use zones, the proposal would allow up to three additional stories of development and, depending on the zone, at most twice as many residential units.⁴ Using a typical site size of 15,000 square feet in an NC-40 zone, this could result in up to 50 additional housing units that would translate to about 30 additional peak-hour automobile trips. At this rate, the difference in traffic and impacts to the street system attributable to the proposal during the peak period of daily transportation congestion could result in localized adverse impacts to the transportation system. This might consist of incrementally longer queues for turning movements at unsignalized intersections, and longer average wait times at local signalized intersections. The exact range of additional trips on given streets would depend on specifics of each transportation network. However, within the range of approximately 30 additional trips or fewer, the effects of any future indirect development on affected properties would be relatively unlikely to create significant adverse impacts on any part of the local transportation system. This could represent an adverse but not a significant adverse impact because development related to the proposal is likely to occur gradually and be dispersed throughout the city across a finite number of sites eligible for proposed provisions. To the extent that a future development could be relatively large with a somewhat higher degree of trip generation, most developments small and large would be reviewed on a project-by-project basis and in the worst-case, localized impacts could potentially be identified that would require incremental improvements at signalized or unsignalized intersections, or other mitigation measures, in order to approve a project permit.

The affected area also includes sites located in single-family zones outside urban villages that are owned or controlled by religious organizations. While the proposal could introduce new, denser housing types, such as townhouse and apartment development, in single-family areas, the increment of additional density is likely to be lower in terms of additional peak-hour vehicle trips compared to the scenario described above. On a 15,000-square-foot site in an SF 5000 zone, the proposal could result in up to 10 housing units, compared to three housing units under existing regulations. Using the same trip rate, this net addition of 7 more housing units under the proposed regulations could result in a net difference of approximately four additional peak-hour vehicle trips. At this rate, the net difference in automobile traffic and impacts to the street system from future development indirectly related to the proposal would be negligible. The proposal would also allow large sites (greater than 10,000 square feet) in single-family zones to accommodate larger affordable housing developments with more housing units. This flexibility would be available only on sites located in or near urban villages and close to frequent transit service, which would at least partially mitigate the potential future increase in vehicle trips by allowing some residents to meet their daily transportation needs via transit.

Public transit

Some properties affected by the proposal are located in urban villages and other areas with frequent transit service. In these cases, the additional increment of affordable housing that the proposal would allow on certain eligible sites could increase demand on public transit, but it is not likely to be a significant adverse impact given the typical level of transit service currently available and planned for in areas with multifamily development, and given the limited number of affordable housing developments likely to occur in any given part of Seattle over time. Any increase in transit demand and ridership resulting from

⁴ For example, an NC-40 zone has an FAR limit of 3.0 under current regulations, of which approximately 2.0 would likely be residential use. Under the proposal, the FAR limit could increase up to 5.0, of which 4.0 would likely be residential use, an increase of approximately 100 percent.

the proposal would be within the range of transit service planning alternatives already contemplated by Seattle Department of Transportation (SDOT) and transit agencies for higher-ridership multifamily areas. Additional residential development in these areas would fall within the overall population and housing growth forecasts that guide SDOT planning and investment decisions (SDOT, 2020).

Other portions of the affected area include certain eligible sites in single-family zones with lower levels of transit service. In these cases, the proposal could increase demand for transit in areas where current transit service is limited. This could result in localized adverse impacts in the form of potential incremental increases in peak-hour crowding of buses and/or demand for additional transit vehicle trips originating and ending in the immediate vicinity of affected properties or districts (SDOT, 2020).

Pedestrian infrastructure

The proposal would affect areas that vary in terms of the presence and quality of safe infrastructure for people walking, like sidewalks. In areas where sidewalks are present, the potential incremental increase in residential density would not meaningfully increase demand on pedestrian space or result in adverse impacts to pedestrian transportation. In areas where sidewalks are generally not present, which includes single-family zones toward the northern and southern ends of the city, the proposed increase in residential density could result in more people walking to and from the development along road shoulders and edges (SDOT, 2020). This would represent a probable adverse but not significant adverse impact.

SMC Section 23.53.006 requires certain development to construct sidewalks, curbs, and curb ramps if they are not present. In urban villages, sidewalks are generally required for any development that abuts an existing street, regardless of zone. Outside urban villages, sidewalks are required for development that abuts certain street types or includes a certain number of units. In single-family zones, development of 10 or more dwelling units triggers the requirement to construct sidewalks. The proposal would increase the likelihood that redevelopment of an eligible property owned by a religious organization would reach that threshold and therefore result in sidewalk construction. This would partially offset the impact to demands on pedestrian infrastructure.

Parking

The proposal would not modify existing requirements for off-street parking. Currently, no minimum parking requirement applies for development of multifamily residential uses that meet certain affordability criteria. Affordable housing developed under this proposal would typically fulfill those requirements and thus would generally not be subject to a minimum parking requirement. Future development indirectly related to this proposal could vary in terms of the number of parking spaces included per housing unit and could include residential development without off-street parking.

Because it could encourage affordable housing, which generally has no minimum off-street parking requirement, and would allow additional amounts of housing development compared to existing regulations, adverse parking impacts could occur due to increases in demand for on-street parking that spills over to surrounding streets. Overall, these impacts are likely to be localized because the proposed provisions are available only on certain properties. Impacts would likely be most pronounced in urban villages, where baseline demand for on-street parking is often high, although frequent transit service available in most urban villages could somewhat reduce the vehicle ownership rate of residents of these future developments; and in certain single-family-zoned areas where lower levels of transit service provides less of an alternative to vehicle ownership, although in these areas on-street parking tends to be

more widely available, e.g., with the ability to find available on-street parking within a few blocks of a residential property (SDOT, 2020). Also, it should be noted that City parking policies and regulations since 2018 allow for residents to seek monthly off-street and off-site parking options in existing buildings. This factor helps reduce the potential for excessive additions to on-street parking competition because a resident with a vehicle but no assigned on-site parking may find opportunities to park elsewhere off the street if they look for available parking rental options in their vicinity.

On large sites in single-family zones, the proposal would allow larger affordable housing developments with more housing units. This flexibility would be available only on sites located in or near urban villages and close to frequent transit service, which would at least partially mitigate an increase in parking demand by reducing vehicle ownership since some residents would be able to meet their daily needs via transit.

It is anticipated that many affordable housing development projects related to the proposal would use public funding from the Seattle Office of Housing. The Office of Housing prioritizes affordable housing investments in areas with planned or existing transit access. In 2019, City investments for all affordable housing were for development sites in frequent transit walksheds (see [Seattle Office of Housing Annual Investments Report – 2019](#), March 2019, Map E, p.21). Therefore, residents of future affordable housing development related to this proposal may be more likely to be near and choose transit over private vehicle ownership. Because the Office of Housing would continue to apply policies regarding the location of this kind of housing with or without adoption of this proposal, no particular difference in the geographic pattern of City-funded affordable housing development is likely to occur.

City funding policy notwithstanding, the proposal could make affordable housing development more feasible in single-family zones, where localized adverse parking impacts could occur, particularly if existing usage of on-street parking in the vicinity of a future new development is high.

Overall, these localized impacts on parking would represent a probable adverse but not a significant adverse impact because the additional increment of residential density and associated increase in parking demand that could result from the proposal are relatively minor in the context of overall housing development and growth in Seattle, and because future development related to this proposal is likely to unfold gradually over time and be dispersed across eligible sites owned or controlled by a religious organization. Therefore, this analysis identifies no probable significant adverse impacts to parking.

Public Services and Utilities

As a non-project action, the proposal would not result in immediate or directly-related development actions, and thus would not generate direct impacts on public services or utilities demands. Over time, the proposal could indirectly lead to future larger and denser residential and mixed-use development with more housing units than allowed under existing regulations. Such impacts would tend to be localized and unlikely to be significant due to the limited range of properties and development that would qualify (for long-term affordable housing on a limited number of properties owned or controlled by religious organizations). This would incrementally contribute to potential adverse but not significant adverse cumulative impacts of increased demands on public services and utilities in any given area with affected properties, and across the city as a whole. Refer to Appendix A, page 16, which illustrates how the affected properties are distributed throughout the city.

Public Services

By allowing greater density of housing on certain eligible sites throughout the city, the proposal could incrementally increase overall demands on public services and utilities. This increase is likely to be minor in the context of overall population growth and within the range of planning alternatives and growth modeling that service providers and public utilities use to anticipate changing demands. The additional increment of affordable housing development allowed under the proposed policy is likely to unfold gradually over time and be dispersed throughout the city, allowing service and utility providers to adjust planning and investment and improvement decisions as needed to accommodate additional demand.

Police

The proposal is not likely to adversely impact the ability of the Seattle Police Department (SPD) to provide police services throughout Seattle or to future specific development projects related to this proposal (SPD, 2020). In a growing and changing city, demand for police services varies over time and by neighborhood. Population growth does not directly correlate to an increased demand for police services. In the context of overall ongoing and forecasted population growth in Seattle, the additional increment of housing development that the proposal would allow is relatively minor and would not be likely to have an adverse effect on police response times (SPD, 2020).

Future larger housing developments in lower-density areas could lead to an incremental increase in call volume but would not be expected to have a significant adverse effect on SPD response capabilities. Future larger housing developments in higher-density zones could result in higher call volumes but would remain within the range of scenarios that SPD can anticipate and accommodate (SPD, 2020). Future development of small-scale commercial uses in multifamily residential zones could affect the type of service SPD must provide. Since development related to the proposal is likely to occur relatively infrequently and be dispersed across eligible sites, this analysis concludes that there could be a potential adverse but not a significant adverse impact on police service.

Fire and emergency medical services

No change is proposed to existing fire and life safety requirements that apply to development. The proposal would allow additional residential density in future development that could result in an increase in call volumes for fire and emergency medical services. Future affordable housing development related to this proposal is anticipated to unfold gradually over time and be dispersed throughout the city across eligible sites owned or controlled by religious organizations. In most cases, this potential increase in call volumes would be within the range of future planning scenarios that guide Seattle Fire Department (SFD) planning and investment decisions (SFD, 2020).

In single-family zones, a localized increase in call concentration could occur from future affordable housing development that includes a greater number of homes than otherwise allowed under existing regulations. Water supply and hydrant availability in most single-family areas are sufficient to accommodate the additional residential density that would be allowed under the proposal (e.g., up to 10 units on a 15,000-square-foot site, compared to up to three units under current regulations) (SFD, 2020).

The size and type of equipment housed in fire stations throughout the city is sufficient to protect larger and denser developments that could be constructed under the proposal because they would tend to occur in limited numbers and be dispersed throughout a given area. Population increase resulting from larger developments would be unlikely to adversely affect SFD's ability to provide emergency medical services

because the increase would be relatively small in the context of total population that SFD serves in a given area (SFD, 2020).

Parks and recreation

The proposal would allow additional residential density on certain eligible faith-owned sites throughout Seattle. The affected area includes sites that vary in terms of amount, quality, and characteristics of available park, open space, and community center services in the vicinity. This includes areas identified as having an open space gap in the Seattle Parks and Recreation (SPR) [*2017 Parks and Open Space Plan*](#) (*Resolution 31763*). The gap analysis helps define SPR's long-term acquisition strategy, priorities for future property acquisition, development plans, and service provision (SPR, 2020).

As the area around existing parks and open space densifies, SPR responds by rethinking and reprioritizing its facilities and services in the vicinity. Residential development in areas identified as an open space gap leads SPR to modify its acquisition strategy. The proposal would not be likely to cause a significant adverse impact on SPR's ability to provide services to future development related to this proposal. A localized increase in demand for parks and open space could occur as future affordable housing development projects related to this proposal would unfold. This additional residential density could inform SPR's future acquisition strategy, factor into its prioritization tools, or lead SPR to modify the design of and/or services available at its existing facilities in the area. This would occur on an ongoing basis and in response to SPR's evaluation of cumulative effects of all growth in Seattle, of which future development related to the proposal would be a part (SPR, 2020).

Schools

Seattle Public Schools continually evaluates the potential impacts of new housing development as part of its regular enrollment planning and capital planning processes. After review of the proposal, Seattle Public Schools concludes that the potential increase in residential density that could result from the proposal is unlikely to lead to a substantial increase in school enrollment because properties eligible for the proposed provisions comprise only a small portion of overall land in Seattle (SPS, 2021).

From a capital planning perspective, the proposal could potentially result in a localized incremental increase in housing within attendance area boundaries of schools that are already close to or over capacity. Additional residential density from future development indirectly related to this proposal would inform and be accommodated through the district's capital planning and/or boundary adjustment processes. This would occur on an ongoing basis and in response to the district's evaluation of the cumulative effects of overall growth in Seattle, of which future development related to this proposal would be a part (SPS, 2021).

Utilities

Seattle City Light

Seattle City Light (SCL) uses various strategies to anticipate and adjust to changing demands, development, and population growth. Despite recent population growth, overall demand for SCL service has remained relatively stable. Future affordable housing development related to this proposal could result in localized increases in demand for electricity compared to existing regulations, particularly for a given site developed at a greater density than otherwise allowed. Development projects that require electrical service beyond the capacity of currently available infrastructure at the site may trigger required utility upgrades, possibly

including undergrounding of overhead electrical transmission infrastructure (SCL, 2020). The developer would typically bear the cost of such upgrades.

The proposal could result in taller affordable housing structures than allowed under existing regulations in zones where zero lot line development is allowed. Structures in these zones can sometimes interfere with SCL's aerial distribution infrastructure. The proposal would increase height limits for affordable housing on certain sites and taller structures than otherwise allowed under existing regulations, which could result in greater adverse impacts on SCL's distribution system. In such cases, SCL would require the development project to relocate its distribution infrastructure underground, including communication infrastructure that shares the aerial system (SCL, 2020). Specific impacts related to future development would be identified on a site-by-site basis and addressed through the permitting process.

Seattle Public Utilities

Additional residential development related to the proposal is not likely to adversely impact the ability of Seattle Public Utilities to provide water, sewer, drainage, and waste treatment services. Future affordable housing development allowed under this proposal could generate incrementally greater demand for these services. In multifamily and mixed-use areas, this increase in demand is likely to fall within the range of SPU supply and demand models that inform planning and investment decisions. In single-family zones, denser development on eligible sites could require additional utility service or infrastructure upgrades (SPU, 2020).

Most affordable housing developments would not be likely to cause excessive demands on local water and sewer systems. In a worst-scenario, a larger affordable housing development could conceivably generate water and sewer demands at levels that might challenge local systems' pipe capacities. These situations would be addressed through regulation and/or project-specific environmental review. Upgrades would generally be a cost borne by the developer as part of the entitlement process. This depends on highly localized and specific characteristics of pipe sizing and condition across many parts of the city where affordable housing development related to this proposal could occur (SPU, 2020).

Water. In general, increased density resulting from the proposal could impact SPU's water distribution system by necessitating watermain extensions, new taps, new hydrants, new meters, and accommodations to fire flow or zoned water pressure, as needed. However, existing codes, policies, and SPU practices already address these matters, and SPU is equipped to accommodate new water services and increased customer demand resulting from increased population growth and/or greater density (SPU, 2020).

Drainage and wastewater. Given the relatively limited numbers of properties that could take advantage of the proposed provisions, coupled with their dispersed ownership throughout the city, the proposal is unlikely to generate any substantial adverse impacts on SPU drainage and wastewater facilities (SPU, 2020).

Solid waste. SPU solid waste services are not likely to be adversely affected by the proposal. Relevant waste storage and access design requirements and service noise requirements for new multifamily development would continue to apply, and would be likely to result in sufficient service outcomes (SPU, 2020).

DECISION – SEPA

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

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

Signature: _____/s/_____ Date: March 8, 2021
Gordon Clowers, Sr. Planner
Seattle Department of Construction and Inspections

List of Sources:

- Seattle Department of Transportation: MaryCatherine Snyder, Jason Fialkoff, Jill Macik
- Seattle Police Department: Angela Socci
- Fire/Emergency Medical - Seattle Fire Department: Ken Brouillette, Rich Richardson
- Seattle Department of Parks and Recreation: David Graves
- Seattle Public Schools: Jeanine Needles, Selam Misgano
- Seattle City Light: Stephen Crume
- Seattle Public Utilities: Kevin Burrell, Cristofer Horbelt (SPU Drainage & Wastewater); Maura Patterson (SPU Water); Hans VanDusen, Kahreen Tebeau (SPU Solid Waste)