

**Adoption of Final Environmental Impact Statement (FEIS)
And Issuance of FEIS Addendum:
Downtown Regional Center Subarea Plan**

Fact Sheet

Project Title: Downtown Regional Center Subarea Plan

Description of the proposal: The City of Seattle is proposing to adopt the Downtown Regional Center Subarea Plan as a section of the Seattle Comprehensive Plan. The Subarea Plan adds information and detail into the Seattle Comprehensive Plan about the Downtown Regional Center, and does not alter, amend or deviate from any policies or information in the Comprehensive Plan.

Proponent: City of Seattle

Lead Agency: City of Seattle, Office of Planning and Community Development (OPCD)

Location: Downtown Regional Center, which includes the Denny Triangle, Belltown, Downtown Core, Chinatown-International District, Pioneer Square and the Downtown Waterfront neighborhoods.

Title of Environmental Document Being Adopted: Seattle Comprehensive Plan Final Environmental Impact Statement (FEIS) (SEPA Record Number: 202500344) and FEIS Addendum for the Downtown Regional Center Subarea Plan.

Environmental Review: The City of Seattle is adopting the existing Final Environmental Impact Statement (FEIS) for the Seattle Comprehensive Plan and is issuing a FEIS Addendum that adds analysis and information pertaining to the proposal to add the Downtown Regional Subarea Plan to the Comprehensive Plan. This addendum does not substantially change the analysis of significant impacts and alternatives in the existing FEIS and subsequent addendums.

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

Date prepared: March 6, 2026

Required Approvals: Approval of the Downtown Regional Center Subarea Plan is by vote of the Seattle City Council.

Date of Implementation: It is expected that the City Council will hold public hearings and review the Downtown Regional Center Subarea Plan in mid-2026 and will adopt the subarea plan as a part of the City's 2026 Comprehensive Plan annual amendments.

Date of Final EIS Issuance: The Seattle Comprehensive Plan Final EIS was issued on January 30, 2025.

Date of EIS Addendum Issuance: March 12, 2026

Review and Comment Period: Comments on this FEIS Addendum may be submitted by 5:00 pm on March 27, 2026. Comments may be submitted:

By e-mail to: Rawan.Hasan@Seattle.gov

Mailed comments may be submitted to:
Seattle OPCD
Attn: Rawan Hasan
PO Box 94788
Seattle, WA 98124-7088

Location of Documents and Background Information: For the Seattle Comprehensive Plan and the FEIS and related documents please see the Comprehensive Plan website: www.seattle.gov/opcd/one-seattle-plan. Click on the Project Documents tab to access the FEIS.

For the Downtown Regional Center Subarea Plan and related documents please see the Downtown Regional Center planning website: www.seattle.gov/opcd/regional-centers-planning/downtown

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Signature: [On File]

Date: March 9, 2026

Purpose of Addendum

This Final EIS Addendum provides additional information to analyze the potential environmental impacts of the proposal to adopt the Downtown Regional Center Subarea Plan.

The Seattle Comprehensive Plan guides decisions about where to locate housing and jobs throughout the city, and where and how to invest in transportation, utilities, parks, and other public assets as well as to guide implementing development standards. The Final EIS for the Comprehensive Plan identified and examined six alternatives for different ways of implementing land use concepts and growth strategies to achieve the City's objectives. The alternatives included a No Action Alternative as the baseline for comparing the potential impacts of the action alternatives. The action alternatives included five different growth strategies (Alternatives 2-5) plus a Preferred Alternative, which most closely aligned with the final Comprehensive Plan that was formally adopted in December of 2025.

The Final EIS identified and disclosed the potential impacts on the built or natural environment that would be likely to stem from the varied versions of the growth strategy and legislative changes that would implement the Comprehensive Plan as expressed in the alternatives. The purpose of the Final EIS was so that the public, agencies, tribes, and City decision-makers had information about the environmental effects of changes before the decision to adopt the Comprehensive Plan and implementing regulations was made. The Final EIS noted that the final plan and implementing legislation could implement a specific alternative or a combination of changes analyzed in different alternatives.

The Comprehensive Plan designates and establishes boundaries for growth areas including the Downtown Regional Center. Regional Center subarea plans are adopted as sections within the overall Comprehensive Plan. The Downtown Regional Center Plan is consistent with the Growth Strategy in the Seattle Comprehensive Plan. Specifically, the Downtown Regional Center anticipates adding 13,500 housing units and 60,000 jobs by 2044 – the same amount that is planned for within the Downtown Regional Center in the final Comprehensive Plan, and the same amount that was analyzed in the Final EIS action alternatives. The Downtown Regional Center Subarea Plan provides more detail and specific policy guidance about how the City is planning for growth and amenities within the boundaries of the Downtown Regional Center. In all cases the information and policy guidance within the subarea plan is consistent with and does not deviate from the overarching policy guidance provided in the Comprehensive Plan.

The Seattle Comprehensive Plan Final EIS conducted analysis by dividing the city into eight analysis areas. The Downtown Regional Center was included in Area 4 along with the South Lake Union Regional Center, Eastlake Urban Center. The Comprehensive Plan Final EIS discussed likely environmental impacts in Area 4 that would occur under the alternatives.

This addendum discloses additional information about the potential for environmental impacts that would result from adoption of the Downtown Regional Center Subarea Plan. The adoption of the Downtown Regional Center Subarea Plan will not create new significant adverse environmental impacts beyond what was already analyzed in the existing Final EIS. The additional information and analysis in this addendum do not substantially change the analysis of significant impacts and alternatives in the existing Final EIS (WAC 197-11-706). This addendum: provides a description of the affected environment and existing conditions within the Downtown Regional Center for each element of the environment, and adds more detail about the area compared to the Final EIS; and reviews and documents the thresholds for significant environmental impact that were established in the Final EIS for each element of the environment; and analyzes the potential for environmental impact that could occur due to adoption of the Downtown Regional Center Subarea plan and documents how those impacts would not substantially change the analysis or identification of significant impacts in the Final EIS.

Summary of the Proposal

The proposal is a non-project action to adopt the Downtown Regional Center Subarea Plan. A draft of the subarea plan was published for public review on January 2, 2026. The Seattle Downtown Regional Center is designated as a Regional Growth Center by the Puget Sound Regional Council (PSRC) and the Growth Management Planning Council (GMPC). These centers are expected to accommodate significant growth, including new housing and jobs, over the next 20 years. Once adopted, the Downtown Regional Center Subarea Plan is proposed to be a section of the City's Comprehensive Plan. The proposed Subarea Plan would satisfy the requirement by PSRC and GMPC that cities adopt dedicated plans for regionally designated places.

The Subarea Plan is organized into several sections that describe the planning context and policy framework for the Downtown Regional Center. The introduction includes background information, planning context, and a section describing how the Subarea Plan aligns with the Seattle Comprehensive Plan. The main body of the plan presents the vision for the Downtown Regional Center, followed by goals and policies organized by theme that outline how the City and its partners can work to achieve that vision. The Subarea Plan also describes how future growth and investments in Downtown respond to the four key moves identified in the Comprehensive Plan and provides a more focused and community-informed roadmap for accommodating the planned growth in housing and jobs in Downtown.

The Downtown Subarea Plan contains the following vision statement for Downtown:

In Downtown Seattle, everyone feels welcome, safe and at home. Around each corner, to and through spaces where every square foot is full of vibrancy, economic opportunity, and beauty.

Together we have found means of stewarding Downtown not just in the moment, but with dedication and consideration for the next seven generations.

The Downtown Subarea Plan establishes five themes for desired future growth and changes in Downtown. Organized within each theme are a series of goal statements that represent the results that the City hopes to realize over time, generally the 20-year life of the plan. For each goal statement there are a series of policies that help to guide creation of or changes to specific rules or strategies to achieve the goal. The plan's themes and corresponding goals and policies are summarized below.

Downtown is Home. Contains 3 Goals and 17 Policies.

Make Downtown Safe and Welcoming. Contains 6 Goals and 29 Policies.

Make Use of Every Square Foot. Contains 6 Goals and 21 Policies.

Steward Our Home for the Next 7 Generations. Contains 4 Goals and 19 Policies.

Find Our Way. Contains 6 Goals and 22 Policies.

The themes, goals and policies present aspirational ideas for the format and character of future growth and improvements and programmatic actions that are desired for Downtown in the future. They respond to unique circumstances and features within Downtown in a more detailed way than the citywide Comprehensive Plan.

The Downtown Subarea Plan plans for the addition of approximately 13,500 housing units and 60,000 jobs within the planning horizon of the plan. This is the same amount of planned growth anticipated for the Downtown Regional Center in the currently adopted citywide Comprehensive Plan. The overall distribution of growth varied among the alternatives evaluated in the Comprehensive Plan Final EIS. However, growth within the Downtown Regional Center was the same under the Final EIS action alternatives. The environmental impacts associated with accommodating housing and employment growth in the Downtown Regional Center were therefore evaluated in the Comprehensive Plan Final EIS. For the purposes of this addendum, the Comprehensive Plan FEIS Preferred Alternative and subsequent addendums is referred to as the baseline to which this Addendum is adding information.

The Downtown Subarea Plan establishes a Future Land Use Map (FLUM) for the Downtown Regional Center. The FLUM details how different areas within Downtown can support the growth that is planned for in the Comprehensive Plan. While the Downtown FLUM provides more detailed place-based guidance, it is entirely consistent with the citywide Comprehensive Plan Future Land Use Map and policy framework. The Downtown Subarea Plan FLUM maps a series of different place types and communicates character features, experiential qualities, and sense of place for each place type.

The Downtown Subarea Plan contains extensive information about existing conditions and features within Downtown as a whole, and for each of its neighborhoods. The Subarea Plan documents the extensive community involvement process that informed creation of the plan. The plan also includes ideas and suggestions for actions that could optionally be taken to

support the plan’s goals and policies. The proposed adoption of the Downtown Subarea Plan is a non-project action.

Environment, Impacts, & Mitigation Measures

Earth & Water Quality

Affected Environment

Critical Land Areas

Downtown Seattle experienced significant infill and regrading work completed in the early 1900s. Portions of the subarea remain hilly with steep inclines. Specifically, the Downtown area has a steep incline from the shoreline up to First Hill and Capitol Hill, with some east-west streets have slopes exceeding 12%.

Downtown Seattle is vulnerable to earthquakes due to its proximity to the Seattle Fault and due to the infill and regrading work completed in the early 1900s. Much of the infilled area is now classified as an environmentally critical area (ECA), either a liquefaction zone or a peat settlement zone, meaning these areas are likely to move during an earthquake. These zones have additional building development standards for new constructions. However, they also encompass historic districts with many unreinforced masonry buildings that are susceptible to structural damage during earthquakes.¹

The ECAs within the Downtown Regional Center include Liquefaction Prone Areas, Steep Slopes (40% average), Flood Prone Areas, Known Slide initiation points, and Peat Settlement Prone Areas. Along Downtown’s shoreline is a Shoreline Habitat Buffer.²

Landcover & Hard Surfaces

Downtown Seattle is heavily urbanized, with impervious surfaces (roads, buildings, and hardscape) covering over 93% of the regional center, totaling approximately 889 acres. From 2016 to 2021, the subarea saw new tree plantings concentrated in designated green spaces and along revitalized streetscapes, such as neighborhoods around Olympic Sculpture Park and Pike Place Market. Conversely, 32 acres of canopy losses occurred mostly in areas undergoing redevelopment and increased construction activities, such as Rainier Square, Wells Fargo Center, and major thoroughfares like 1st Avenue, 2nd Avenue, and 3rd Avenue. This dynamic resulted in a net reduction in overall tree canopy coverage from 10% in 2016 to 9.3% in 2021.³

¹ Agency Landscape + Planning, *Environment & Climate Change Technical Report for the Downtown Regional Center Plan*, 32-49.

² *Ibid.*, 9.

³ *Ibid.*, 19-20.

Surface Water

The Downtown Regional Center is primarily part of the Puget Sound watershed, with portions of the northeast part of the subarea found within the Lake Washington watershed. Elliott Bay is a key surface water in the Downtown Regional Center. Several challenges and factors affect the current water quality in Elliott Bay. The subarea, which has an active waterfront and slopes towards the water, faces pollution from several primary sources, including vessels in the water and runoff from the land. These pollutants are harmful to marine habitats. Compared to other areas in Seattle, the Downtown Regional Center has a higher proportion of impervious surfaces and urban activities.

Over 80% of the Downtown Regional Center's drainage infrastructure uses combined sewers that collect both stormwater and wastewater. During heavy rainfall, these systems can become overwhelmed, discharging untreated sewage into Elliott Bay and other water bodies. Areas like Alaskan Way and Vine St have been identified as exceeding CSO performance standards of no more than one overflow per outfall per year over a twenty-year moving average. Additionally, high wastewater system capacity risks are concentrated around the southern portion of the subarea and the Chinatown-International District (CID). Downtown Seattle has three CSO locations that discharge into Elliott Bay near Myrtle Edwards Park, the Clipper Seattle Ferry Terminal, and Pier 48.⁴

Shorelines

Today much of the Downtown waterfront is dominated by piers and overwater structures. Before the Alaskan Way Viaduct was removed, the waterfront and its parks were difficult for pedestrians to access. With the viaduct's removal and the new Alaskan Way design, accessibility has improved greatly. However, a steep slope of nearly 120 feet remains between Alaskan Way and 1st Avenue. Due to its waterfront location, Downtown Seattle is vulnerable to tsunami inundation.⁵ Uses and development on the shoreline are governed by the City's Shoreline Master Program (SMP) regulations.

Sea Level Rise

By 2050, sea levels are projected to rise between 1.1 and 1.5 feet, and by 2100, they could increase by 3.1 to 5.1 feet by some projections. As sea levels rise, high tide flooding will threaten critical facilities within the 100-year floodplain. This risk is heightened by the proximity of essential infrastructure to the waterfront, including Alaskan Way, Colman Dock, and the Port of Seattle. The reconstruction of the Elliott Bay Seawall completed in 2017 uses the highest predicted sea level rise from a University of Washington Climate Impacts Group study.⁶ Exhibit 3.1-11 in the Final EIS depicts forecasted sea level rise in the year 2100 noting areas projected to experience 2 feet or greater of sea level rise. No areas of 2 feet or greater sea level rise are projected for within the Downtown Regional Center.

⁴ Ibid., 24-27.

⁵ Ibid., 25, 35, and 50.

⁶ Ibid., 34.

Thresholds of Significance

The Seattle Comprehensive Plan Final EIS established the following thresholds of significance for environmental impact pertaining to earth and water quality.

Runoff Increases: Impervious surface expansions that would increase runoff flow volumes and durations to streams by magnitudes resulting in bank scour and erosion;

Surface Water Quality: Increases in amount of pollution to receiving waters that would impair their designated uses (such as human contact and fish habitat);

Groundwater Recharge: Impervious surface expansions that would decrease groundwater recharge beyond designated limits;

Groundwater Quality: increases in amount of pollution discharged to levels that would contaminate groundwater supplies;

Environmental Earth and Soil Hazards: Disturbances of existing contaminated areas to levels that could endanger human health or the environment;

Climate Change—Extreme Precipitation: Growth concentrated into areas that are reasonably expected to be at risk for future flooding and landslides; and

Climate Change—Sea-level Rise: Growth concentrated into areas that are reasonably expected to be at risk for future sea-level rise.

Impacts

With respect to direct impacts, the Final EIS identified that every alternative would increase density in the city boundary and likely result in increased vehicle use, increased hard surfaces, and focus additional development closer to water resources. However, the redevelopment associated with each alternative would comply with City codes requiring stormwater management, critical areas protections, building upgrades, and other measures to avoid or minimize potential impacts to earth and water resources.

The goals, policies and FLUM in the proposed Downtown Subarea Plan are consistent with the citywide comprehensive plan and would not increase or decrease the amount of housing or job growth that is planned for within the center or studied in the Final EIS. Therefore, the subarea plan would not substantially change the degree or types of impacts that would stem from density and the amount of future development on earth or water quality. Development that is expected to occur under the subarea plan would not increase the likelihood to exceed any of the earth and water quality thresholds of significance or create different adverse impacts than those analyzed in the Final EIS. The Downtown Regional Center contains extensive existing stormwater and utility infrastructure, and all new development would be subject to stormwater management and shoreline regulations.

Indirect impacts on earth and water resources generally come from indirect changes to pollutant sources and land cover through changes to the pattern and locations of population density and growth rate. Focusing growth in previously developed urban areas can reduce impacts on regional earth and water resources compared to accommodating the same growth

in previously undeveloped areas outside of cities, which may result in new impervious surfaces, even when the new development is controlled under current standards. In the Final EIS, the indirect overall effect from the preferred alternative is considered beneficial to earth and water resources in the region that includes the city and areas beyond. The Downtown Regional Center is already a highly urbanized area at the center of the Puget Sound region. Direction of growth to the Downtown Regional Center supports the finding in the Final EIS that dense growth within already-urbanized centers would have beneficial effects on earth and water resources in the region that includes the city and areas beyond.

Air Quality & GHG Emissions

Affected Environment

Transportation Emissions

Downtown Seattle is the region's major employment hub, attracting many commuters who drive, take ferries, use public transit, walk, or bike to work. The Downtown Regional Center is adjacent to two freeways (I-5 and I-90) that carry more than 100,000 vehicles per day. Vehicle trips to and from Downtown and vehicle trips passing through Downtown affect air quality and GHG emissions. Emission from heavy vehicles and trucks on roadways are a main source of emissions because of more impactful particulate emissions from diesel fuels. Transportation systems contribute to climate change primarily through the emissions of certain greenhouse gases (GHG) (CO₂, CH₄ and N₂O) from the combustion of nonrenewable gasoline and diesel fuels used to operate passenger, commercial, and transit vehicles. Overall, emissions from transportation sources are the largest source of air quality and GHG emissions affecting the area.

Air quality impacts from transportation sources are considered as a total amount of emissions generated from vehicle travel, and on a per capita basis. In general transportation emissions increase with an increased number of vehicle trips. However, if the share of travelers who choose alternatives to vehicle trips (i.e. walking, rolling and transit) increases, the amount of emissions on a per capita basis would decrease. The COVID-19 pandemic and the rise of remote work altered commuting patterns. Telework has become more common for many Downtown jobs, reducing the total number of commuting trips and associated transportation emissions compared to pre-2020 levels. Public transportation ridership has returned to its pre-2020 levels.⁷

Sensitive Populations

Sensitive populations are those who are the most at-risk of adverse effects from elevated levels of air pollutants, whether due to age, previous or ongoing illnesses, socioeconomic status (SES), or other conditions such as pregnancy. Land uses with populations sensitive to air quality include residential areas, schools, daycare facilities, hospitals, and nursing and convalescent homes. Downtown is among the subareas of the city with the highest environmental health risks posed to sensitive populations. Interstate-5 (I-5) runs along the eastern edge of the

⁷ Ibid., 39.

Downtown Regional Center and through the CID, negatively impacting air quality in this subarea. Downtown Seattle has high asthma rates, especially in Pioneer Square and the CID, where nearly 10% of adults are diagnosed with asthma according to the City's Climate Vulnerability Tool.⁸ For analysis, the Final EIS identified a 1,000-foot buffer around roadways and highways with daily trips greater than 100,000 vehicles. Existing uses along Interstate 5 (I-5) north of Interstate 90 (I-90) in Downtown consist of a high amount of residential uses, within 1,000 feet of transportation sources of air pollutants.

Building Emissions

The City's neighborhood-level emissions tracker shows that the largest sector of building energy consumption in the Downtown Regional Center is from commercial structures. Over the past decade, the subarea has seen significant new construction that meets higher energy codes and primarily uses electrical energy, resulting in higher commercial electrical energy consumption compared to other areas of Seattle. However, historic neighborhoods like Pioneer Square and the CID have older, less energy-efficient buildings that rely more on gas and fuel energy. The Centrio District Energy powers over 150 Downtown buildings with natural gas that contributes to these emissions.⁹

Thresholds of Significance

The Seattle Comprehensive Plan FEIS established thresholds of significance for environmental impact pertaining to air quality and GHG as follows.

Air Pollution: Growth concentrated in areas with high exposure to air pollution.

Per Capita GHG emissions: Increase in GHG emissions on a per capita basis.

Consistency with other efforts: Actions would prevent or deter statewide, regional, or local efforts to reduce GHG emissions.

Impacts

Analysis in the Final EIS focused on two criteria air pollutants: carbon monoxide (CO) and particulate matter (PM) resulting from changes in land uses and transportation patterns. It also considered other criteria air pollutants such as ozone precursors (reactive organic gases, ROGs, and oxides of nitrogen, NOx) and Toxic Air Pollutants (TAPs). The Final EIS also analyzed how implementation of the growth alternatives may contribute to global climate change through the emission of greenhouse gases (GHGs).

All the 2044 alternatives analyzed in the Comprehensive Plan Final EIS are expected to generate lower air pollutant emissions than in 2018, resulting in a net decrease in transportation-related emissions of VOC, CO, and NOX. This is because projected improvements in fuel economy outweigh the projected increase in VMT for criteria pollutants. All alternatives for which VMT

⁸ Ibid., 30.

⁹ Ibid., 38.

data were provided resulted in roughly the same annual GHG emissions, with variation within approximately one half of one percent.

The Preferred Alternative in the Comprehensive Plan Final EIS had the most concentrated projected growth. It was expected to have the highest total GHG emissions and the lowest GHG per capita among the alternatives. Therefore, roadway emissions were considered a minor adverse impact in the Comprehensive Plan Final EIS.

The goals, policies and FLUM in the proposed Downtown Subarea Plan would not increase or decrease the amount of housing or job growth that is planned for within the center. Therefore, the subarea plan would not substantially change the degree of impact that would stem from density and future development and its impacts on air pollution and per capita GHG emissions.

Numerous goals and policies in the subarea plan emphasize supporting trips by rolling, walking and transit use especially under the “Finding our Way” theme, including:

FW 1.1 Pursue street transformations to create more space for walking, rolling, biking, transit, and lingering or gathering.

FW 2.1 Prioritize pedestrian safety and visibility at crossings throughout Downtown.

FW 2.2 Apply strategies to reduce collisions and vehicle speeding in pedestrian-rich Downtown neighborhoods.

Implementation of these subarea-plan specific policies would likely contribute to a reduction in per capita GHG emissions and could to a small degree reduce air pollution if some vehicle trips are eliminated in favor of non-motorized and transit trips as the infrastructure and environment for safe and comfortable non-motorized trips improves over time. The Downtown Subarea Plan would likely advance or support several of the mitigation measures promoting a reduction in Vehicle Miles Traveled, such as improving pedestrian facilities, bicycle improvements, and transit improvements.

Concerning sensitive receptors, there is potential for impact where new residential growth would be located in areas with high exposure to air pollution. Downtown is located centrally within the City of Seattle and is heavily affected by on-road and rail sources of air pollutants. I-5 runs along the eastern boundary. Additionally, a pollutant source is railway pollutants from the freight trains that operate on the BNSF owned tracks that are exposed near the C/ID and Pioneer Square and Belltown neighborhoods. Another source of air pollution is commercial cruise and other non-industrial operations at waterfront terminals on Elliott Bay near Belltown.

Planned growth under the Comprehensive Plan and the Downtown Subarea Plan has the potential to increase residential densities within a 1,000 foot buffer area of the pollution emitting facilities described above. This potential increased exposure is considered a potential moderate adverse impact related to air quality. The goals, policies and FLUM in the Downtown subarea plan do not alter the expected pattern of future residential development compared to the FEIS Preferred Alternative in a way that would concentrate more residential near sources of pollution. The subarea plan includes a strong emphasis on adding housing into downtown

under the “Downtown is Home” goal, but the total amount of additional housing is the same as planned for in the Comprehensive Plan. Some neighborhoods including the Downtown Core and the Belltown neighborhood are emphasized in the subarea plan for future residential development. Parts of these neighborhoods are within the buffer area affected by pollution from I-5 or cruise ships or the rail line, and large portions of them are not.

The subarea plan would not prevent or deter statewide, regional, or local efforts to reduce GHG emissions. No significant unavoidable adverse impacts to air quality and greenhouse gas emissions are anticipated.

Plants & Animals

Affected Environment

Tree Canopy

From 2016 to 2021, Downtown Seattle's urban environment saw significant changes in its tree canopy due to both new plantings and removal. In 2021, the city enhanced its urban greenery by planting approximately 26 acres of new tree canopies in areas around Olympic Sculpture Park, Pike Place Market, and designated green spaces. However, 32 acres of canopy losses occurred mostly in areas undergoing redevelopment and increased construction activities, such as Rainier Square, Wells Fargo Center, and major thoroughfares like 1st Avenue, 2nd Avenue, and 3rd Avenue. This dynamic resulted in a net reduction in overall tree canopy coverage in the subarea from 10% in 2016 to 9.3% in 2021. The city's limited resources allocated for tree maintenance, including pruning and pest control, have also played a role in tree canopy loss. Common types of trees found in the subarea include Sweetgum, Norway Maple, London Plane, Red Maple, and Red Oak trees.¹⁰

Habitats

The abundance and diversity of species in any given area of Seattle varies with the degree of urban development. Downtown is one of the most intensely developed parts of the city and it generally has little vegetative cover and supports a comparatively small number of wildlife species that are adapted to high levels of human activity.

ESA-listed Chinook salmon and steelhead are present in some streams in the city, but none of those streams are in the Downtown subarea. These and other ESA-listed and state-listed aquatic species are present in marine waters that receive stormwater runoff from the city, including bull trout, rockfish, marbled murrelets, and Southern Resident killer whales. The shores of Elliott Bay are the western border of the Downtown Regional Center.

Stormwater Runoff

Compared to other areas in Seattle, the Downtown Regional Center faces challenges due to its higher density of impervious surfaces and increased urban activities, such as vehicle traffic and

¹⁰ Ibid., 19-21.

events along the waterfront. Over 80% of Downtown’s infrastructure uses combined sewers that collect both stormwater and wastewater. During heavy rainfall, these systems can become overwhelmed, discharging untreated sewage into Elliott Bay and other water bodies.¹¹ According to analysis conducted in 2019 and 2020 by Seattle Public Utilities, nearly all of Downtown is outside of a stormwater drainage capacity risk area, meaning the drainage system generally has adequate capacity to convey stormwater runoff. However, Downtown includes areas with critical, high, and medium wastewater capacity risk associated with the combined sewer system ¹².

There are 21 adopted Green Streets in the subarea which integrate elements such as rain gardens, permeable pavements, and bioswales to manage stormwater runoff.¹³

Thresholds of Significance

The Seattle Comprehensive Plan FEIS established thresholds of significance for environmental impact pertaining to plants and animals as follows:

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

Impacts

The goals, policies and FLUM in the proposed Downtown Subarea Plan would not increase or decrease the amount of housing or job growth that is planned for within the center. Therefore, the subarea plan would not substantially change the degree or types of impacts on plants and animals. Subarea plan goals and policies would not reduce the likelihood that populations of native plant or animal species would persist in or near Seattle; nor would they substantially increase potential for tree canopy loss; nor would they cause an appreciable increase in the delivery of stormwater contaminants to fish bearing streams or waters.

The Downtown Subarea Plan is a non-project action that would not amend or alter any existing regulations that protect plants and animals. Existing regulations protect plants and animals by encouraging the retention and expansion of tree canopy and minimizing contaminants delivered to surface waters, including fish-bearing streams and waters. Applicable regulations include those restricting the removal of trees on private property (SMC Chapter 25.11, Tree Protection); limiting disturbance and requiring mitigation in Environmentally Critical Areas (SMC

¹¹ Ibid., 27.

¹² BAE Urban Economics, *Public Facilities & Services Technical Report for the Downtown Regional Center Plan*, 19.

¹³ Agency Landscape + Planning, *Environment & Climate Change Technical Report*, 29.

Chapter 25.09 and 23.60A); regulating street trees; requiring landscaping and tree planting; and implementing stormwater requirements.

Emphasis in the Downtown Subarea Plan is placed on strategies for how Downtown Seattle can add additional green space, open space and vegetation to become more livable. These strategies would also support habitat for plants and animals. Relevant policies are found under the “Make Downtown Safe and Welcoming” theme, and the “Steward our Home for the Next Seven Generations” theme. Policies that encourage an increase in habitat and/or tree canopy include but are not limited to:

SW 4.1 Expand access to park space in areas with gaps, and in communities that were disproportionately affected by past planning actions.

Policy SG 1.4: Communicate the value of water resources, urban habitat, tree canopy, and ecological systems that uniquely reinforce Downtowns slopes, green spaces, and waterfront conditions.

Policy SG 2.1: Manage stormwater responsibly by cleaning and minimizing run-off into Puget Sound and reducing the strain on Downtowns combined sewer overflow facilities.

Policy SG 2.4: Protect and expand Downtown’s tree canopy.

Overall, the goals and policies in Downtown Subarea Plan are likely to improve tree canopy and habitat for plants and animals, and there would be no significant adverse impacts from adoption of the plan.

Energy & Natural Resources

Affected Environment

Over the past decade, the Downtown Regional Center has seen significant new construction that meets higher energy codes and primarily uses electrical energy. However, historic neighborhoods like Pioneer Square and the CID have a high concentration of older, less energy-efficient buildings that rely more on gas and fuel energy. The CenTrio District Energy powers over 150 Downtown buildings with natural gas.

In 2018, Seattle City Light built the Denny Substation which serves the subarea. This substation is designed to last 50 to 100 years and accommodate future growth in the area. The 2025-2030 Seattle City Light Capital Improvement Plan lists multiple projects within the Downtown Regional Center, including ongoing work to increase the Union Street Substation network capacity and electrification of CenTrio.¹⁴

Buildings account for more than one third of Seattle’s core greenhouse gas emissions and are the focus of this analysis. For discussion of energy demands from transportation and GHG emissions see the Air quality and GHG section of this addendum.

¹⁴ Agency Landscape + Planning, *Environment & Climate Change Technical Report*, 38.
BAE Urban Economics, *Public Facilities & Services Technical Report*, 23.

Thresholds of Significance

Thresholds of significance utilized in this impact analysis for Energy and Natural Resources are: energy usage in excess of projected supply availability, and conflict with energy policies adopted by the City of Seattle.

Impacts

Future growth under the subarea plan would result in development of new residential, retail, office, and commercial uses, which would result in the consumption of energy by construction equipment, and bound energy in construction materials. Additionally, increases in future development would increase population and employment in Downtown which would increase the operational energy consumption of more buildings. In general, a greater amount of future development would cause greater demands on energy during construction and operation. The goals, policies and FLUM in the proposed Downtown Subarea Plan would not increase or decrease the amount of housing or job growth that is planned for within the center compared to the amount planned for in the Comprehensive Plan and evaluated for impact in the action alternatives of the Final EIS. Therefore, the subarea plan would not substantially change the degree of impact that would stem from density and future development and its impacts on energy and natural resources.

All new development or redevelopment in Downtown would be designed and constructed to meet the applicable state and City building and energy code requirements which would reduce energy consumption as compared to prior structures which likely used more energy consumption on a pro rata basis. A mixture of newer and older development would likely be more energy efficient than existing development, based on changes to building codes, innovations in building and technologies, and compliance with City energy conservation measures. The energy regulations and commitments that new development would be subjected to include: the City of Seattle Energy Code regulates the energy-use features of new and remodeled buildings; and Seattle's Energy Benchmarking Law; and compliance with the Seattle Building Tune-Ups Ordinance (Seattle Municipal Code 22.930); and the Building Emissions Performance Standards (BEPS) which sets emissions targets for existing and future buildings over 20,000 square feet that the buildings must meet over time to improve energy efficiency.

Future development in Downtown under the subarea plan will most likely be largescale construction that is over 20,000 square feet and would be required to comply with BEPS. The Downtown Subarea Plan places an emphasis on encouraging the reuse and rehabilitation of historic aged structures including Policy DH 1.8 "Reduce the barriers (regulatory, financial, and informational) to making updates required by construction and energy codes when retrofitting historic buildings." and other policies in the plan. These aspects of the subarea plan, which call for conversion or upgrade of Downtown's historic aged structures are more likely to reduce energy demands compared to a scenario without the proposed subarea plan.

No significant unavoidable adverse impacts on energy are anticipated. Impact on energy due to growth and development would be mitigated by applying energy codes to new development and VMT measures for building and transportation energy usage. Adherence to energy efficiency measures would ensure that future development would not result in the consumption of energy resources in excess of projected supply availability. Nothing in the proposed Downtown Subarea Plan would conflict with energy policies adopted by the City of Seattle.

Land Use Patterns & Urban Form

Affected Environment

Land Use Pattern

The Downtown Regional Center includes the commercial and financial center of Seattle and houses its densest and tallest commercial and mixed-use buildings. Commercial/office and mixed-use land uses are centered in the Downtown Core area, and the Denny Triangle. Compared to these parts of Downtown, a greater proportion of multi-family housing uses, and neighborhood-serving commercial and retail uses are found in the Belltown, Chinatown/International District, and Pioneer Square neighborhoods. Major institutions, public facilities, and utility land uses—including the King County and City of Seattle offices and facilities and the Washington State Convention Center—are interspersed throughout Downtown and account for a sizeable portion of existing uses. Parks and open spaces also account for a portion of land use in Downtown, and have expanded in recent years with the addition of the rehabilitated waterfront along Elliot Bay. Downtown contains a high concentration of civic uses and entertainment destinations—such as the Seattle Art Museum, Benaroya Hall, and Pike Place Market—compared to other parts of the city. Civic uses and entertainment destinations attract a large number of visitors to Downtown.

On a percentage basis, the Downtown Regional Center consists primarily of commercial uses by total land area (acreage): office (25%), retail/ other commercial (22%), and mixed-use (13%) properties. Institutions and public facilities account for another 10% of the total land area, and multifamily properties make up 9%. Land that is either vacant, an easement, or in use as a parking lot makes up 14% of the total land area. There are scattered sites with single family homes, industrial uses, and park spaces—each use accounts for 3% or less of the total land area.¹⁵

Zoning and Development Regulations

Seattle's zoning regulations include limits on building height, as well as other characteristics, including density, floor area ratio (FAR), minimum setbacks, and maximum lot coverage. All of these regulations contribute to the overall intensity and characteristics of development at any given location.

¹⁵ Seva Workshop, *Land Use Technical Report for the Downtown Regional Center Plan*, 24-32.

Downtown zoning can be grouped into nine primary categories. The largest amount of land (40%) is designated as “Downtown Mixed.” Next, the Downtown Harborfront and Downtown Office Core zones each make up 15% of Downtown property. The International District zone is 10%, Pioneer Square zone is 9%, and Industrial zones are 6%. The remaining land is dedicated to the Downtown Retail Core (3%), Pike Place Market (2%), and 0.2% zoned as Master Planned Community.

There are three historic and special review districts in Downtown (Pioneer Square Preservation District, Pike Place Market Historic District, and International Special Review District). These areas are subject to unique development regulations and development permits generally require review and/or approval by an independent advisory body.

In Downtown Mixed Commercial (DMC) and Downtown Mixed Residential (DMR) zones, base height limits are 75’, 95’, or 170’. Areas within the Downtown Harborfront (DH) zones have height restrictions to ensure view corridors are intact from upland public spaces, ranging from 45’ to 85’. In the Downtown Office Core (DOC) zones, low-density commercial uses are prohibited outright and allowed building heights range from 290’-500’, or an unlimited height limit. In the Downtown Retail Core (DRC) zone, which is limited to several blocks near Westlake Center, height limits range from 85’-170’.

Height limits vary across the Chinatown/International District Mixed zones. Height limit ranges include 75’–85’, 85’–170’, 65’–150’, 125’-270’, and 170’. For most areas within the CID, upper limits of height are allowed only for residential uses.

Height limits are lower in the Pioneer Square Mixed zones to maintain its historic character. Across most of Pioneer Square, heights are limited to 100’, with an additional 20’ or 30’ allowed in some areas if residential use is incorporated and certain building requirements are met. There is a small pocket abutting the CID that allows 120’ outright and up to 150’. Another pocket directly north of the stadium allows only 85’ but up to 120’, and even 240’ for a subsection, if affordable housing, among other requirements for public benefit, is included.¹⁶

Based on a 2022 land capacity model, there is ample capacity to meet the housing and job targets in the Downtown Regional Center under the existing zoning framework. This capacity is inclusive of parcels that are vacant and available for redevelopment, which are found primarily in Belltown, Denny Triangle, and the CID.

Urban Form and Height/Bulk/Scale

The height, bulk, scale, and character of the built environment varies considerably across Downtown. The area includes the densest area of Seattle, where Belltown, Denny Triangle, and the Business District have a range of existing high-rises to skyscrapers. Downtown contains 6 distinct neighborhoods or sub-districts, which are informative for the urban form analysis.

¹⁶ Ibid., 24-26.

Downtown Core, Waterfront, the Chinatown/International District (CID), Pioneer Square, Belltown, and the Denny Triangle.

Downtown Core. The Downtown Core is the heart of Seattle, encompassing the city's retail and financial centers, and hubs of government. As retail trends shift away from national chains, large vacant ground-floor spaces have altered the public realm. The district also faces significant connectivity challenges. I-5 creates a barrier between Downtown and Capitol Hill, while the steep slopes between Downtown and the waterfront make pedestrian access difficult.¹⁷ The Downtown Core contains numerous half block or full block highrise commercial and residential structures with a very high degree of massiveness and a strong visual presence in Downtown and from other parts of Seattle.

Waterfront. The removal of the Alaskan Way Viaduct and Seattle's waterfront transformation has created space for a redesigned waterfront featuring wider sidewalks, new bike lanes, a direct connection to the water at Habitat Beach, and improved access into Downtown. The Waterfront Park adds green spaces, seating areas, and pedestrian-friendly promenades. At the Pike Place Market, the Market Front expansion provides public space with stunning views and safer, more walkable connections between the historic market and the waterfront, despite the steep grade.¹⁸ The waterfront includes a series of historic piers on the west side interspersed with open views over Elliott Bay. On its eastern flank the waterfront includes a variety of commercial and residential structures ranging from 3 stories to over 12 stories.

Chinatown International District (CID). Established as a historic district in 1999, the CID features a dynamic mix of residences, businesses, and cultural landmarks. The neighborhood is physically divided by I-5, creating challenges for wayfinding and pedestrian connectivity. To the east of I-5, Little Saigon is a key extension of the district, home to many Vietnamese businesses as well as light industrial and production spaces that are essential to the neighborhood's economy and identity.¹⁹ Many structures in the CID are historic-aged masonry structures in the range from 3 – 6 stories tall. Most streets in the CID are lined with a consistent wall of storefronts at street level.

Pioneer Square. Pioneer Square is home to a remarkable collection of historic buildings, giving the district a distinct character. Its northern boundary follows a zigzagging pattern due to misaligned street grids, reflecting differences in historical plans. The neighborhood features a high concentration of cultural spaces and several beloved public parks and landscapes, including Occidental Square, Pioneer Park, and City Hall Park.²⁰ Many structures in Pioneer Square are historic-aged masonry structures in the range from 3 – 8 stories tall. Most streets in Pioneer Square are lined with a consistent wall of storefronts at street level.

¹⁷ Office of Planning and Community Development (OPCD), *Downtown Regional Center Plan*, 161.

¹⁸ *Ibid.*, 165.

¹⁹ *Ibid.*, 169.

²⁰ *Ibid.*, 173.

Belltown. Belltown is shaped by a massive regrading project in the early 1900s to create developable land. It has evolved into a vibrant mix of residential towers, restaurants, retail, nightclubs, and art galleries. Despite its midcentury look and feel, many of Belltown’s buildings are relatively new – 48% of its buildings were built after 1990. Despite its proximity to the Waterfront, a steep grade change and train tracks create a significant barrier to direct access.²¹

Denny Triangle. Once situated on a steep hill, the area was leveled during the Denny Regrade to enhance transportation and commercial development. Presently, development is primarily mixed-use. The Denny Triangle includes a high concentration of tower structures, many of which were built during the 1990’s or later. The area includes both residential and commercial/office towers, and it includes the Amazon Corporate headquarters and other largescale office structures. Westlake Avenue, a historic thoroughfare, runs diagonally through the neighborhood. Pedestrians and cyclists must cross I-5 via overpasses on the eastern border of the subarea to reach Denny Triangle.²²

Categories of Impact

The proposed Downtown Regional Center Subarea Plan is evaluated for categories of impact that were studied in the One Seattle Plan FEIS. The analysis combines some of the impact categories discussed in the FEIS for brevity and relevance to the Subarea Plan.

Land use patterns and compatibility. This considers the distribution of growth and intensity of planned uses as well as resulting activity levels. Land use compatibility considers changes in use type between adjacent areas and any likely incompatibilities. Land use incompatibilities could be related to health and safety (such as noise levels or odors), activity levels at various times of day/night, or conflicting movement patterns.

Height, bulk, and scale and urban form. This considers the physical form, aesthetic, and character of development (such as massing, setbacks, height, and FAR). Views and shadow considerations are addressed. This also considers transitions of visual changes in physical form between adjacent areas.

Impacts

Adoption of the Downtown Subarea Plan is a non-project action. No development is proposed and the proposal to adopt the Subarea Plan does not alter any zoning or land use regulations. The goals, policies and FLUM in the proposed Downtown Subarea Plan would not increase or decrease the amount of housing or job growth that is planned for within the center. Adoption of the subarea plan would not substantially change the degree of impact on land use and urban form that would stem from density and future development from what was evaluated in the FEIS.

²¹ Ibid., 177.

²² Ibid., 165.

The Subarea Plan includes a proposed Future Land Use Map that is specific to the Downtown Regional Center. The FLUM adds an increased amount of direction and policy guidance about the desired mix of future land uses, as well as the desired character and localized pattern of new development within Downtown. However, none of these influences on the future land use pattern or character of development would deviate from the policy direction for Regional Centers in the One Seattle Plan.

Land Use Patterns and Compatibility

The Subarea Plan does not change the existing planned land use pattern. It observes existing land use characteristics and calls for minor adjustments and evolutions of use patterns. The plan includes a new future land use map that could influence the character of predominant use patterns slightly over time. Some of the land use designations in the FLUM were already in previous Comprehensive Plans or planning documents including the 1999 Downtown Neighborhood Plan, while some of the planned land use concepts are new including: a new Civic Campus designation on the map, a new waterfront designation on the map, and renaming of the Downtown Office Core area to the Downtown Core area.

These new FLUM concepts are primarily about the identity of areas, and they may guide the visual or aesthetic qualities of future investments. The changes do not adversely affect land use patterns and compatibility.

Policies in the subarea plan under the “Downtown is Home” theme, call for a greater emphasis on residential uses in Downtown than has occurred during the previous planning period. Specific policies include:

DH1.2 Prioritize residential development in the Downtown Core

DH 1.6 Explore additional programs or actions that provide incentives for office-to-income restricted residential conversion proposals.

These policies could lead to a slightly greater proportion of residential development in parts of Downtown (i.e. Downtown Core and the Civic Campus area), and residential development that is supportive of families and children, than might otherwise occur in the absence of the subarea plan. This small shift would not cause an adverse effect on land use or compatibility, since residential uses already exist in these places, are compatible with other land uses in Downtown, and are consistent with the policy direction for Regional Centers provided in the Seattle Comprehensive Plan.

Another theme in the subarea plan is “Make Use of Every Square Foot”. This theme includes policies promoting the reuse of existing underutilized spaces, and an emphasis on supporting a transition away from an office-dominated land use pattern in parts of Downtown. Specific policies include:

SF 1.1 Adapt underutilized Downtown office spaces and upper floors to new uses.

SF 3.1 Ensure Downtown offers an adequate supply of suitable commercial space for small- and medium-sized businesses.

SF 6.1 Increase events and activities in public and private spaces near cultural hubs in each neighborhood to make these areas more vibrant, welcoming, and connected to the community.

SF 6.4 Grow and support Downtown’s arts and culture, entertainment, and sports districts.

These and other policies in the plan could cause a shift in land use over time to alternative uses to large-scale commercial/office employer uses, towards more residential uses and arts and entertainment uses. These shifts would not cause an adverse effect on land use or compatibility, since the increased uses are already present in Downtown, would be compatible with other land uses in Downtown, and are consistent with the policy direction for Regional Centers in the Comprehensive Plan.

Height, Bulk, and Scale and Urban Form

Adoption of the Downtown Subarea Plan is a non-project action. No development is proposed and the proposal to adopt the Subarea Plan does not alter any zoning or land use regulations. Therefore adoption of the subarea plan has no direct effect on height, bulk and scale or urban form, and the potential for only very small and long-term indirect effects.

Policies in the subarea plan do not make direct calls for changes to regulations increasing height, bulk and scale. Establishment of new district identity (Waterfront and Civic Campus) could lead to small changes in urban form over time. The subarea plan emphasizes reusing the existing built environment under the “make use of every square foot” theme and includes many other policies pertaining to programming. The subarea plan emphasizes improvements to networks of open spaces. If implemented, these policy directions would not adversely impact height, bulk and scale, and their effect on urban form would not be adverse.

Over time, additional growth and development will occur in Downtown and a generalized increase in development intensity, height, bulk, and scale is expected. These changes are an expected characteristic of urban population and employment growth. No significant unavoidable adverse impacts to land use patterns, compatibility, or urban form are expected.

Plans and Policies

Affected Environment

The current policy and regulatory framework regulating land use in Seattle flows from the Washington State Growth Management Act (GMA), PSRC’s Multi-County Planning Policies (MPPs) contained in VISION 2050, King County’s Countywide Planning Policies (CPPs), the City’s Comprehensive Plan, and implementation actions including development standards in the Seattle Municipal Code (SMC) and the Shoreline Master Program (SMP). Several other regulatory measures affect land use including localized overlay districts and design guidelines.

The major update to the Seattle Comprehensive Plan was adopted by the City Council in December of 2025. The updated plan established a new growth strategy policy framework of

Regional Centers (including the Downtown Regional Center), Urban Centers, Neighborhood Centers, and Manufacturing Industrial Centers (MICs). The updated Comprehensive Plan ensured continued consistency with the latest provisions of the State, regional and multi-county policies for land use and growth.

PSRC's regional planning framework requires that cities prepare updated subarea plans for each designated regional center and manufacturing industrial center. Regional Center Subarea Plans must be completed and recertified by PSRC by the end of year 2027. The multi-county policies set out activity unit targets (jobs and housing) for each Regional Center. The City's Regional Center plan must demonstrate how it adequately plans for the target amount of activity units (planned job and housing growth). PSRC provides certification criteria for Regional Centers Subarea Plans, including a requirement for a vision statement, goals and policies and a list of topics that must be studied and addressed.

Thresholds of Significance

The proposed Downtown Regional Subarea Plan is evaluated for conformity to state and regional plans and policies, and to Seattle's adopted Comprehensive Plan. The thresholds of significance utilized in this impact analysis is: inconsistency with adopted plans and policies.

The Downtown Subarea Plan plans for a projected increase of 60,000 jobs and 13,500 housing unit. These amounts comply with the activity units targets of the CPPs and are the same as the amount of growth planned for in the Comprehensive Plan. All of the goals and policies within the proposed Downtown Subarea Plan were reviewed as a part of this analysis, and found not to conflict with or deviate from the goals and policies of the One Seattle Comprehensive Plan. The subarea plan documents its compliance with the Comprehensive Plan. The proposed adoption of the Downtown Subarea Plan will satisfy the regional policy requirement for Seattle to adopt a subarea plan for its regional centers.

No significant unavoidable adverse impacts are anticipated with respect to plans and policies. The proposed subarea plan is consistent with all regional plans and state requirements and the regional growth strategy.

Population, Housing, & Employment

Affected Environment

Population

Approximately 43,000 people live in the Downtown Regional Center.

Race & Ethnicity. Over half of Downtown's population (55%) identifies as people of color, reflecting the area's diversity. Asian residents comprise 34.5%. Black or African American residents at 6.3%. Hispanic or Latino individuals account for 7.7% of the population, while those

identifying as two or more races make up 5.4%, Under 1% of Downtown residents identify as Native Hawaiian, Pacific Islander, or American Indian/Alaska Native.²³

Age Profile. Approximately 60% of the people living in the Downtown Regional Center are under the age of 40. The age group 18-29 represents 30% of this under 40 group, while the age group 30-39 represents 28.7% of the under 40 group. 2% of the population is under the age of 18. Downtown residents aged 50-64 account for 16.4% of the population, while residents above 65 represent 12.7% of the population. 10.2% of the population are 40-49 years old.²⁴

Household Characteristics. Today, 7% of Downtown households are considered low-income, 9% very low-income, and 24% extremely low-income, defined as 30 percent or less of the HUD Area Median Income (AMI). In addition, 34% of all households—regardless of income bracket—are cost burdened from housing. Presently, renters comprise 81% of Downtown’s residents.²⁵

Between 2018 and 2022, the median household income in the Downtown Regional Center was approximately \$111,100. There are significant differences in income across Downtown neighborhoods. More than half of downtown households reported earning over \$100,000 per year and more than a quarter of householders make over \$200,000 per year. The Downtown Regional Center, however, has the largest share of lower-income households than the City or Region, with approximately 30% of households making less than \$50,000 per year, compared to approximately 21% in Seattle and 22% in the Puget Sound Region. Almost 13% of the households in Downtown had income of less than \$15,000 per year.

Similarly, median household income in the subarea varies greatly by neighborhood. The median household income was higher in the northern portion of the Downtown (primarily Denny Triangle and parts of Belltown) than in the southern portion of subarea (Pioneer Square and the CID).²⁶

Housing Supply

Downtown Seattle has added a significant supply of new housing in recent years, estimated at nearly 20,000 new housing units between 2010 and 2024, and by 2044 is projected to grow by 13,500 additional housing units. With this 2044 target the Downtown Regional Center would become the city’s largest residential center.²⁷

The Downtown Regional Center’s housing stock consists almost exclusively of multifamily housing units according to April 2024 data from King County Assessor. The multifamily units are

²³ Ibid., 21.

²⁴ Ibid.

²⁵ BAE Urban Economics, *Housing Plans & Policies Technical Report for Downtown Regional Center Plan*, 3. Seva Workshop, *Housing Innovations Technical Report for Downtown Regional Center Plan*, 3. OPCD, *Downtown Regional Center Plan*, 47.

²⁶ BAE Urban Economics, *Economic Development Technical Report for Downtown Regional Center Plan*, 11-12.

²⁷ BAE Urban Economics, *Housing Plans & Policies Technical Report*, 2.

primarily apartments and condos or condos in apartment use. Studio or one-bedroom apartments built in the last ten years account for 97% of housing units in the subarea. Approximately 5% of the housing units are congregate housing units. Between 2018 and 2022, Downtown had a residential vacancy rate of 13.4%.²⁸

Housing Affordability

Both rental and for-sale housing remains in comparatively high demand in Downtown Seattle, and the cost of housing in the Downtown Regional Center is generally higher than elsewhere in the city, particularly in terms of rental rates in multifamily residential properties. The average asking rent for rental apartments in Downtown in the fourth quarter of 2023 was \$2,389, an increase of 1.7% from 2022 and several hundred dollars above the average asking rent in Seattle and Puget Sound Region.²⁹

Downtown Seattle has a substantial existing inventory of affordable residential properties. According to HUD data, 76 projects within the Downtown Regional Center have been financed in part with the Low-Income Housing Tax Credits (LIHTC) program. These projects are primarily concentrated in Belltown, Pioneer Square, and the CID. The 76 housing properties include a total of 6,163 units, 94% of which are affordable. Fifteen of the 76 housing properties have expired rent restrictions, with another ten expiring in the next five years.³⁰

Displacement

Significant portions of the Downtown Regional Center experience elevated displacement pressures. Displacement risks are highest for both residents and businesses in the southern portion of the subarea, including Pioneer Square and the CID. Households living in the subarea are overwhelming renters, and a significant portion pay more than 30% of their gross household income towards housing costs, indicating a heavy housing burden. Businesses in older commercial structures on properties zoned to allow for higher densities are at a particular risk for redevelopment. In addition to various construction-related impacts that can interfere with normal business operations and deter customers, transit and other infrastructure improvements will also affect land values, which can incentivize the redevelopment of older properties and displace longtime business and neighborhood institutions.³¹

Employment

The Downtown Regional Center is projected to add 60,000 jobs by 2044. The subarea is the largest employment node in Seattle, accounting for 29% of the city's jobs as of 2020. The

²⁸ BAE Urban Economics, *Economic Development Technical Report*, 28-30.

²⁹ *Ibid.*, 33.

³⁰ BAE Urban Economics, *Housing Plans & Policies Technical Report*, 3.
BAE Urban Economics, *Anti-Displacement Strategies Report for Downtown Regional Center Plan*, 2.
OPCD, *Downtown Regional Center Plan*, 47.

³¹ BAE Urban Economics, *Anti-Displacement Strategies*, 2.
Seva Workshop, *Land Use Technical Report*, 54-55.

subarea saw a substantial increase in employment between 2010 and 2020, with 60,240 new jobs added.

Making up two-thirds of the total 2020 jobs, Downtown employment is dominated by the Services sector, largely in the Professional, Scientific, and Technical Services sector and the Information sector. The Services sector is responsible for most of the employment growth in the Downtown Regional Center, adding over 53,000 jobs between 2010 and 2020. The two other sectors with over 10% of total jobs are Finance, Insurance, Real Estate, and Government. Employment in these two sectors was stable over the 2010 to 2020 decade. Retail Trade and Wholesale Trade, Transportation, and Utilities both showed job growth of nearly 40% over the 10-year period.³²

Impact Analysis

Analysis of impacts on Population, Housing, and Employment in the Comprehensive Plan FEIS focused on how effectively the proposal would achieve three objectives: increase the supply, diversity, and affordability of market-rate housing; increase the supply of income-restricted housing ;and reduce residential displacement.

This analysis evaluated the potential for increased physical displacement and considered a displacement impact significant if the projected number of physically displaced renter households would exceed the projected number of new income restricted affordable housing units that would be created.

Impacts

Under the Downtown Subarea Plan, the regional center is expected to grow by an additional 13,500 housing units over the planning horizon. The goals, policies and FLUM in the subarea plan would not result in a greater or lesser amount of housing growth than is projected for the center in the One Seattle Comprehensive Plan and evaluated in the Comprehensive Plan Final EIS. Therefore, the subarea plan would not substantially change the degree of impact that would stem from density and future development and its impacts on population, housing or employment.

It is expected that all new housing in Downtown would be dense multifamily housing in multistory structures. The supply of new homes would most likely be split roughly evenly between rental housing units and for-sale condominium homes. It is expected that most of the new housing in Downtown would be in tall buildings with heights greater than 85'. For market rate housing development, many of these homes would be expected to have rent or for-sale prices for households with incomes at or above the 120%AMI level. However, Downtown has historically been a location that receives a high share of the city's rent- and income-restricted housing, and it is expected that Downtown would continue to receive a sizeable quantity of such new housing.

³² BAE Urban Economics, *Economic Development Technical Report*, 16-17.

The Downtown Subarea Plan includes several policies pertaining to the desired types and characteristics of new housing under the “Downtown is Home” theme. The theme also prescribes policies intended to facilitate or support housing production, and policies to support several distinct lower income population groups to find housing in Downtown. Specific policies include:

- DH 1.1 Regularly review, simplify, and optimize permitting regulations and processes that affect Downtown residential development; and
- DH 1.4 Partner with the private sector to advance innovations in new housing construction; and
- DH 1.5 Encourage the conversion of existing downtown buildings to allow for a wider variety of uses, with an emphasis on securing long-term income-restricted housing; and
- DH 2.1 Protect low income renters from increased risk of displacement by focusing on those with incomes at or below 50% of the area median income (AMI); and
- DH 3.1 Increase housing that supports residents in all different life stages (family-friendly housing, live-work housing, accessible senior housing); and
- DH 3.4 Expand family-focused services and experiences, particularly around housing and transit.

These policies are likely to advance the three housing objectives that are evaluated for impact. Implementation of the Downtown Subarea Plan’s policies are expected to support housing production and help reduce constraints on the city’s housing supply, which may also help reduce pressures that contribute to displacement. The policies will be beneficial, so they don’t create any adverse impacts on housing.

Over time, additional growth and development will occur in Downtown, and much of this growth will occur through redevelopment. While this can contribute to the risk of direct physical displacement, that risk is not expected to be as high in Downtown as in some other sectors of the city, because it is expected that a relatively high proportion of new development in Downtown would be on underutilized sites and structures or on parking lots. Moreover, the benefits in terms of reduced economic displacement pressure and increased production of affordable units from the City’s MHA and MFTE programs in Downtown outweigh any increased risk of physical displacement. No significant unavoidable adverse impacts to population, employment, or housing are expected under the Downtown Subarea Plan.

Cultural Resources

Affected Environment

The Downtown Regional Center Plan recognizes the rich cultural history held within Downtown neighborhoods. Many of the plan’s goals and policies strive to preserve this history as well as work to enhance the cultural resources that make the Downtown Regional Center unique. Across these neighborhoods, there are 77 public art pieces, 206 cultural spaces, and 122 landmarks.³³

³³ Seva Workshop, *Land Use Technical Report*, 43-49.

*Landmarks*³⁴

Denny Triangle and the Downtown Core host the most official landmarks, including the Paramount Theater, Camlin Hotel, Seattle Monorail, the Seattle Tower, and Freeway Park. Other landmarks found in the Downtown Regional Center include and are not limited to: Chief Seattle Statue (Belltown), Moore Theater (Belltown), Panama Hotel and Hashidate Yu Bathhouse (CID), Eastern Hotel (CID), Smith Town (Pioneer Square), Flat Iron Building (Pioneer Square), Fire Station #5 (Waterfront), and Pier 54, 55, 56, 57, 59 (Waterfront).

Historic Districts

Chinatown International District (CID). The CID is a landmarked historic district, and in 1973, a special review district, known as the International Special Review District, was established to preserve the unique Asian American character of this neighborhood. The boundaries of the International Special Review District align with the neighborhood boundaries, inclusive of the CID on both sides of I-5. This designation and framework ensure a higher standard of design and promotes a cohesive aesthetic, balance of complementary uses, and preservation of the neighborhood's unique identity and character.³⁵

Pioneer Square. Pioneer Square was Seattle's first national historic district, established in 1970 with boundaries that expanded in 1973 and again in 1987. Its boundary includes most of the defined neighborhood, with the exception of the Lumen Field footprint and Pier 48. The station area around the International District-Chinatown light rail station is also included, making this area unique as it is covered by both the Pioneer Square and CID Historic District boundaries. Design guidelines for this District are outlined in SMC 23.66.030. These regulations allow Pioneer Square to maintain its unique aesthetic and quality of pedestrian realm. This results in buildings of lower heights than the adjacent Commercial Core, façades of stone and brick, streets lined with trees, cobblestone paving in public spaces, and a diverse selection of retail and restaurants on the ground floor.³⁶

Waterfront. The Pike Place Market is located within the Waterfront neighborhood. In 1971, the area covering the Market was established as a protected Historical District, with a Historical Commission formed to steward this unique city asset through changes and challenges over time. As the oldest continuously operating public market in the country, the goals of the Commission are to preserve the Market as a place for farmers to sell their own produce, local shoppers to buy food, low- and moderate-income households to find affordable goods and services, and a varied shopping area with many small, owner-operated specialty businesses. With Market Guidelines, the historic district also zones for the concentration of certain uses that preserve the Market's character.³⁷

³⁴ Ibid.

³⁵ Ibid., 30.

³⁶ Ibid., 28

³⁷ Ibid., 30.

Tribal Assets

The Downtown Regional Center Plan strives to uplift Indigenous voices and honor Tribal rights. Prior to the presence of White settlers in the region, Seattle, and the area around Downtown, was inhabited extensively by Coast Salish peoples for thousands of years. The waterfront was a fishing village, a center for trade, and a place through which many different tribal communities traveled. At the time of the first White settlements around 1850, natives were living in more than 90 longhouses, in at least 17 villages, in modern-day Seattle and the surrounding area.³⁸ The Downtown subarea, where water meets the land, remain important to the Indigenous community as an area to protect, reconnect, and reclaim. The Waterfront stands out to the Indigenous community as a place of opportunity, where increased environmental stewardship is needed to respond to the impact of development on water and land quality and ultimately, tribal livelihoods as tribal fishers and fisheries are also impacted.³⁹

Thresholds of Significance

Impacts on cultural resources are considered significant if they result in substantial adverse changes to, alteration, or loss of a resource that impacts its eligibility for inclusion as an SL, or in the NRHP, NHL program, or the WHR.

Adverse impacts (potential loss of or alterations to the physical evidence or tangible evidence of cultural history) to Culturally Important Resources (CIR), which for the purposes of the Final EIS are important to certain cultural groups or communities, whether or not they are listed or eligible for the SL, NRHP, or WHR.

Impacts

Adoption of the Downtown Subarea Plan is a non-project action. No development is proposed and the proposal to adopt the Subarea Plan does not alter any zoning or land use regulations including regulations that protect historic and cultural resources. Therefore, adoption of the subarea plan has no direct effect on historic and cultural resources and potential for only very small and long-term indirect effects. The goals, policies and FLUM in the proposed Downtown Subarea Plan would not increase or decrease the amount of housing or job growth that is planned for within the center. As a result, the environmental analysis of impacts to historic and cultural resources contained in the Comprehensive Plan Final EIS continues to apply, and adoption of the Subarea Plan does not change the conclusions of the analysis in the FEIS Preferred Alternative and FEIS Addendums regarding impacts associated with future development.

The subarea plan includes several policies that relate to celebrating and protecting downtown's history and culture. (See goal SW 6). Specific policies include:

³⁸ Agency Landscape + Planning, *Environment & Climate Change Technical Report*, 24. Seva Workshop, *Land Use Technical Report*, 3.

³⁹ Wilson and Segrest, *Envisioning An Indigenous Downtown Seattle*, 12-13,19.

SW 6.2 Preserve Downtown’s built history while enabling contemporary evolution; and
SW 6.3 Reinforce and celebrate each Downtown neighborhood’s unique identity.

Under the “Steward our Home for the Next Seven Generations” theme, the subarea plan includes numerous policies in support of increasing the emphasis on Indigenous culture and heritage in Downtown’s built environmental and programming. Specific policies include:

SG 1.2 Collaborate with representatives of Tribal Nations, urban Indian communities, and local non-profits to deepen storytelling and wayfinding that honor the cultural and ecological significance of water; and

SG 1.3 Facilitate waterfront access for Indigenous communities and honor treaty rights and cultural practices.

The policies listed above have potential to increase the amount of protection of cultural resources during development compared to what would occur in the absence of the subarea plan.

Development or redevelopment is likely to impact cultural resources. As identified in the Comprehensive Plan Final EIS, future development in Downtown has the potential for significant adverse impacts to cultural resources. Such impacts can include physical alteration, damage, or destruction of all or part of a resource; alteration of the characteristics of the surrounding environment that contribute to the property’s significance; and the introduction of visual or audible elements that are out of character with the property. The Final EIS identified that mitigation measures and existing review process can help avoid or reduce these impacts before cultural resources are lost or significantly altered. With the implementation of advanced planning or mitigation, significant adverse impacts to cultural resources can be avoided or minimized.

Adoption of the subarea plan would support increased mitigation within the context of Downtown, and would not cause additional adverse impacts, including cumulative impacts from other actions and plans, to historic and cultural resources beyond those identified in the One Seattle Plan FEIS for action alternatives.

Transportation

Affected Environment

Downtown Seattle functions as the region’s primary transportation hub and major destination for workers from beyond the regional center. The regional transit systems of Link Light Rail and Sounder Rail are oriented to move people into, out of, and around Downtown. King County Metro’s bus service, the City’s Streetcar grid, Washington State Ferries, and the federal interstate highway system all contribute to the transportation landscape that allows over 188,000 workers and 32,000 residents to access their jobs and homes.⁴⁰

⁴⁰ OPCD, *Downtown Regional Center Plan*, 124.

Downtown Seattle’s urban form is oriented primarily towards the movement and storage of cars and trucks, with the right-of-way allocation for vehicles representing roughly 61%. A significant portion of Downtown’s real estate are streets that are focused on moving vehicles – especially vehicles entering the area during morning peak hours and leaving during evening peak hours.⁴¹ The rise of more remote work, along with a shift away from transit and towards personal vehicle for commuting, has created stressors in the subarea that was, during even pre-pandemic times, overwhelmed with peak hour vehicle traffic.⁴²

Streets in SoDo and along the waterfront are designated as Major Truck Streets, although freight moves on almost all streets throughout Downtown. The Downtown Core and parts of Pioneer Square, Denny Triangle, and Belltown are in a special “Downtown Traffic Control Zone” which supersedes any designation of “Major” or “Minor” truck street. In control zones, trucks over 30 feet in length are not permitted during daytime hours without special permission.⁴³

Mode Split

Based on 2022 Seattle Commute survey, 21% of commuters drive alone, 25% use rideshare, 22% use public transit, and 25% bike or walk.⁴⁴ The Downtown Regional Center Subarea Plan’s goal is to shift the mode share to 15% driving and 85% walk-bike-transit.⁴⁵

Transit Expansion and Right-of-Way Transformation

Downtown is both a hub for surface transit (local buses, regional bus service, and two streetcar lines) along with underground rail service (Link Light Rail, Sounder Regional Rail, and Amtrak service). Many streets in the subarea have priority for transit service, notably 3rd Avenue, and require curb space for transit stops and bus layover. A network of community and mobility hubs is envisioned in the Seattle Transportation Plan, which has a strong nexus to transit hubs.⁴⁶ Opportunities to manage commute volumes will come with future expansion of the regional Link Light Rail system.⁴⁷ The light rail expansion proposed three new stations directly located in Downtown: Denny (right at the border of the Downtown Regional Center boundary), Midtown (location of station to be determined as alternatives are being studied), and a new station in the CID. Enhanced connections will be offered at Westlake.⁴⁸

Bus services will be restructured in concert with the light rail expansion, helping to create frequent and reliable transit service corridors. Potential consolidation of transit could change

Seva Workshop, *Land Use Technical Report*, 1.

⁴¹ Seattle Department of Transportation (SDOT), *Downtown Seattle Transportation Study*, 2-4.

⁴² *Ibid.*, 4.

⁴³ *Ibid.*, 29-30.

⁴⁴ *Ibid.*, 5.

⁴⁵ OPCD, *Downtown Regional Center Plan*, 124.

⁴⁶ SDOT, *Downtown Seattle Transportation Study*, 28.

⁴⁷ *Ibid.*, 4.

⁴⁸ Seva Workshop, *Land Use Technical Report*, 17-18.

right-of-way use to expanded pedestrian spaces, additional green infrastructure, or bicycle facilities. Streets in the Downtown subarea with the highest levels of regional bus services (such as 2nd, 4th, and 5th Avenues) and those connecting to the regional freeway network (4th Avenue S, Olive Way, Howell St, and Stewart St) are those with the greatest potential for transformation where many of these corridors will go to lower transit service later in the 2020s because of the switch to light rail.⁴⁹

Connectivity

Construction of large infrastructure projects have historically displaced many residents, especially low-income communities and communities of color, and divided neighborhoods. Many of these projects were done for the sake of transportation opportunities for vehicles or regional and interstate transportation at the harm of the communities who were impacted. Some neighborhood divides in the subarea include:⁵⁰

The railroad tracks at King Street Station create a chasm between Pioneer Square and the CID as well as a divide along the waterfront north of Pike Market; and I-5 divides the CID, separating most of Chinatown and Japantown from Little Saigon; and Large arterials often function as barriers for pedestrians to cross; and From the waterfront to I-5 there are steep topography changes that create barriers for people of all ages and abilities to easily access different neighborhoods in the subarea.

One major potential project to enhance connectivity is the proposed I-5 lid, which aims to reconnect neighborhoods divided by the freeway and provide new green spaces and sidewalks.⁵¹

Thresholds of Significance

The FEIS identified a series of quantified thresholds of significant transportation impacts in the following topical areas:

SOV mode share increase; and
Exceedance of the transit agency crowding threshold; and
Increase in Vehicle Miles Travelled (VMT) per capita; and
Causing or exacerbating operation at LOS F in travel time on corridors; and
Causing or exacerbating exceedance of the Volume to Capacity (V/C) threshold at screen lines
Causing or exacerbating intersection operation at an unacceptable level; and
Causing or exacerbating an increase of the volume-to-LOS service volume ratio on state facilities.

⁴⁹ SDOT, *Downtown Seattle Transportation Study*, 13.

⁵⁰ SDOT, *Downtown Seattle Transportation Study*, 7.

Agency Landscape + Planning, *Environment & Climate Change Technical Report*, 50-51.

⁵¹ Agency Landscape + Planning, *Environment & Climate Change Technical Report*, 22.

Impacts

The goals, policies and FLUM in the proposed Downtown Subarea Plan would not increase or decrease the amount of housing or job growth that is planned for within the center. The plan doesn't significantly alter the pattern/location of housing and job growth. Therefore, the subarea plan would not substantially change the degree of impact that would stem from density and future development and its impacts on transportation. Adoption of the Downtown Subarea Plan would not alter the findings of significant impact in any of the topical areas measured in the FEIS pertaining to transportation.

As planned growth continues, travel demand is expected to increase in Downtown, resulting in potentially significant adverse impacts to transit passenger load, corridor travel time, screenlines, intersection LOS, and state facilities. These potential impacts were analyzed in the One Seattle Plan Final EIS and subsequent addenda. The City will pursue targeted transportation capacity improvements focused on improved transit, bicycle, pedestrian, and freight connections. Additionally, the City will manage demand using policies, programs, and investments aimed at shifting travel to non-SOV modes. However, the magnitude and duration of traffic congestion during peak periods is expected to be exacerbated as growth continues to occur. Some combination of the travel demand management strategies discussed in the One Seattle Plan Final EIS could be implemented to reduce the magnitude of SOV travel, providing some mitigation. In the absence of state facility capacity expansion beyond that already planned and funded, there may still be significant unavoidable adverse impacts to state facilities and screenlines. Intersection impacts are not expected to be fully mitigated and there may still be significant unavoidable adverse impact to intersection LOS. These impacts were analyzed in the Final EIS and addendum, and adoption of the subarea plan would not alter the assessment of impact.

The Downtown Subarea Plan includes several policies pertaining to transportation under the "Find Our Way" theme. Many of the policies focus on enhancing or improving movement through Downtown by modes other than personal vehicles. Specific policies include:

- FW 1.1 Pursue street transformations to create more space for walking, rolling, biking, transit, and lingering or gathering; and
- FW 1.3 Advance a mix of seasonal, weekend, and in some cases, permanent restrictions for personal vehicle traffic to make areas of Downtown car-free or "car-lite."; and
- FW 2.1 Prioritize pedestrian safety and visibility at crossings throughout Downtown; and
- FW 4.5 Advance multimodal access to create connected, people-centered places that reflect community visions and support equitable, vibrant growth; and
- FW 5.3 Plan for and support dedicated spaces that accommodate freight and logistics activities.

These policies have potential to increase the mitigation of expected transportation impacts in Downtown, especially in the topical areas of limiting increases in SOV vehicle trips and VMT. However, the degree would not be large enough to change the One Seattle Plan Final EIS's overall assessment of transportation impact.

Public Services

Affected Environment

Public services analyzed are police, fire, emergency medical; parks and recreation; and schools. These services are provided citywide principally by the City of Seattle for police, fire, and parks, and by the Seattle Public Schools and other private institutions for education. Regarding parks, the focus is on Seattle Parks and Recreation (SPR) facilities managed with a level of service for the public. The proposal to adopt the Downtown Subarea Plan does not have any meaningful effects on provision of solid waste services.

Police

The Downtown Regional Center is within the Seattle Police Department's (SPD) West Precinct. SPD conducts the Seattle Public Safety Survey, which collects data at the micro-community level about perceptions of crime and public safety and police-community interactions by precinct. From the most recently available survey respondents from Downtown had similar top public safety themes compared to the city but noted drugs and alcohol as a higher priority. The precinct has the highest fear of crime compared to the city and had a higher favorable perception of SPD and police nationwide than other parts of the city. Violent crime was noted as a top priority in the International District. This information matches information provided by community members during the Downtown Subarea planning process, which communicated that public safety was a major concern and topic of interest for Downtown community members.

As of 2022 the West precinct was staffed with 8 sergeants and 107 officers. The West precinct was built in 1999 and is 46,231 square feet. It is located in the Denny Triangle neighborhood of Downtown at the intersection of 8th Ave. and Virginia St. It is currently at capacity. The six-year average dispatches in the West precinct was 113,585 – the highest of any of Seattle's 5 precincts over that period of time.

Fire

SFD provides emergency response services through five battalions consisting of 33 fire stations (plus Battalion 3/Medic One at Harborview Medical Center). Fire stations are placed around the city to maximize coverage and minimize response time. Downtown is within Battalion 2. The SFD headquarters, Fire Station 2 – Belltown, Fire Station 5 – Waterfront, Fire Station 10 – International District are located in Downtown, and the Medic One / Harborview Medical Center is close to downtown and provides services there. Seattle Fire Headquarters is also home to the Health One program. Health One is an integrated health response unit that can respond to physical or mental health crises and provides social services to those in distress.

SFD strives for the following response time standards citywide.

Call Processing Time: 60 seconds for phone answered to first unit assigned for 90% of calls. (In 2024, this was met for 60% of calls).

Fire Response Time: Arrival within 4 minutes for first-arriving engine at a fire for 90% of calls. (In 2024, this was met for 75% of calls).

Fire Response Time: Arrival within 8 minutes of the full first alarm assignment of 15 firefighters, for 90% of calls. (In 2024 this was met for 95% of calls.)

Basic Life Support: Arrival within 4 minutes of the first medical unit with two EMTs, for 90% of calls. (In 2024 this was met for 75% of calls.)

Advanced Life Support: Arrival within 8 minutes for 90% of calls. (In 2024 this was met for 82% of calls.)

Fire and emergency services to Downtown are influenced by its land area that is dedicated to a high concentration of major institutions, large-scale commercial properties, and dense multifamily dwellings. These structures have stricter fire codes than other types of structures and therefore service response in downtown typically requires more aid dispatches than fire dispatches.

Community Assisted Response and Engagement (CARE)

The Community Assisted Response and Engagement (CARE) department is Seattle's third branch of public safety, established in October 2023, alongside the Seattle Police Department and the Seattle Fire Department. The Seattle CARE Department operates the 9-1-1 Communications Center and the Community Crisis Responder (CCR) Team. The 9-1-1 Communications Center initially screens all incoming 9-1-1 calls within the City of Seattle and oversees public safety radio dispatching of Seattle Police Department (SPD) personnel and CARE CCRs. When a person calls 9-1-1 for help, the City of Seattle aims to send resources immediately and intervene effectively, to meet the needs identified and achieve an optimal outcome for all parties involved. The CARE Team plays an important role in Downtown and other neighborhoods. It is able to respond to non-emergency incidents.

Parks

The Seattle Parks strategic plan sets a direction for the 12-year period 2020-2032, establishing a vision and key strategies. Additionally, Seattle Parks and Recreation (SPR) updated and adopted a new Parks and Open Space Plan in May 2024. The new plan establishes a level of service standard of providing parks and park facilities within a 10-minute walk. The plan also includes a long-term acquisition strategy to provide access to natural areas, and parks in a 5-minute walk in urban centers including Downtown.

Downtown includes Denny Park, Olympic Sculpture Park, Victor Steinbrueck Park, Waterfront Park, City Hall Park, Hing Hay Park, Danny Woo Garden and Kobe Terrace, Occidental Square, various public plazas, and Port of Seattle piers. Waterfront park was completed in 2025 and is a notable addition to Downtown's open space. It is a 20-acre linear public space featuring many programming events and scenic views.

Although Downtown meets a 5-minute walk level of service standard it is still considered an area of priority public space needs. In 2020, OPCD developed an “Outside Citywide” map tool considering access to open spaces at city, county, state, and federal governments, special districts like schools and the Port, and other private space. Based on race and social equity, density and growth, and health outcomes, the City identified priority areas for public space provision including most of Downtown.

Schools

The Seattle School District serves the city as a whole with 103 schools, including 63 Elementary Schools, 10 K-8 Schools, 12 Middle Schools, and 18 High Schools. Downtown Seattle does not include any public schools. Downtown has 3 independent private schools. Students living in Downtown most commonly attend Seattle public schools in adjacent neighborhoods such as in Capitol Hill/First Hill (FEIS analysis area 3), or Uptown and Queen Anne, or Beacon Hill (FEIS analysis area 5). All 9 schools in analysis area 3 are below operational capacity. In analysis area 5, 11 out of 12 schools are below operational capacity (Tops K-8 is slightly above operational capacity). In instances where capacity is less than enrollment, portables or adjustments to school service area may be required. The community involvement process for the Subarea Plan noted that the lack of an existing school in Downtown is a factor that makes it more difficult for families to raise children in Downtown.

Thresholds of Significance

Impacts of the alternatives are considered significant if they:

Increase demand for police or fire and emergency that can't be accommodated through regular planning and staffing processes; or

Result in insufficient parks, open space, and trail capacity to serve expected population based on existing levels of service; or

Result in increases in public school enrollment that cannot be accommodated through regular school planning processes; or

Result in insufficient capacity to handle solid waste under current Seattle Public Facility plans.

Impacts

Increased density of population and jobs is anticipated to increase the potential demand for police services. However, many factors influence crime rates. Growth in worker and residential populations in the study area is expected to lead to an increased number of calls for aid, basic and advanced life support, and other emergency services. Over time, additional staffing and equipment in the areas of both police and fire/emergency services would be required in order to maintain or improve performance levels. The goals, policies, and FLUM in the proposed Downtown Subarea Plan would not increase or decrease the amount of housing or job growth that is planned for within the center compared to the amount of growth evaluated in the FEIS Preferred Alternative. Therefore, the subarea plan would not substantially change the degree of impact that would stem from density and future development and its impacts on demand for police services.

One of the themes of the Downtown Subarea Plan is “Make Downtown Safe and Welcoming”. The first goal under the theme is “Make Downtown safe for everyone, all hours of the day”, and the policies under this goal include:

SW 1.1 Ensure outdoor spaces are accessible, well-lit, comfortable, and clean.

SW 1.2 Create a comfortable and convenient transit experience for everyone, including while waiting for buses and making transfers.

SW 1.3 Maintain public spaces through dedicated resources and continued partnerships with local communities and businesses, to reduce the burden of public space maintenance on historically underinvested communities.

SW 1.4 Enhance community policing services and alternative response programs.

SW 1.6 Support Downtown Parks with wrap-around response teams that provide a range of services and skillsets.

These policies point to actions to improve how the physical environment can support public safety, and how partners to SPD can contribute to enhancing public safety. If these policies are implemented they would most likely have a positive impact on public safety in Downtown.

Adoption of the Downtown Subarea Plan would not cause an increase in demand for police or fire and emergency services that can't be accommodated through regular planning and staffing processes. No significant unavoidable adverse impacts are expected.

The Downtown Subarea Plan could add more growth including within a 10-minute walk to the parks, and within the 5-minute walk to parks and open space that is the City's goal for within designated regional and urban centers. The goals, policies and FLUM in the proposed Downtown Subarea Plan would not increase or decrease the amount of housing or job growth that is planned for within the center compared to the amount of growth evaluated in the FEIS Preferred Alternative. Therefore, the subarea plan would not substantially change the degree of impact that would stem from density and future development and its impacts on demand for parks. The subarea plan would not result in insufficient parks, open space, and trail capacity to serve expected population based on the adopted level of service.

The Downtown Subarea Plan includes numerous policies that call for enhancements or additions to green and public spaces in Downtown that are specific to conditions and issues in Downtown. These include:

SW 4.1 Expand access to park space in areas with gaps, and in communities that were disproportionately affected by past planning actions.

SW 4.2 Focus on new park space creation where service gaps are identified by Seattle Parks and Recreation in the Chinatown-International District, Belltown, and Denny Triangle.

SW 4.4 Seek opportunities to repurpose or activate the right of way for recreational opportunities.

SW 4.6 Collaborate with commercial property owners and other non-City partners to expand access to high-quality amenities.

SW 5.1 Increase youth and all ages cultural, arts, and recreation amenities in existing and new Downtown parks and community facilities, focusing first on areas that are taking on more residential units.

SW 5.2 Activate Downtown parks for neighborhood-wide events.

If these policies are implemented they would be likely to enhance or improve the function of open spaces for residents and users, and the policies could lead to an increase in the total quantity of open space in Downtown. Therefore the likely impact of the Subarea Plan on open space is expected to be positive and not adverse.

Future growth under the Downtown Subarea Plan could result in an increase in the number of students. The Downtown Subarea Plan includes goal DH3 “Evolve Downtown neighborhoods to better meet the diverse needs of all residents and families”. Policies under this goal include:

Policy DH 3.1 Increase housing that supports residents in all different life stages (family-friendly housing, live-work housing, accessible senior housing).

Policy DH 3.4 Expand family-focused services and experiences, particularly around housing and transit.

Policy DH 3.5 Encourage childcare facilities, public restrooms, indoor open play spaces, or children focused educational programs as part of incentives programs.

If these policies are implemented, it is possible that population growth in Downtown could include a higher proportion of child residents than has been present in Downtown previously. This could require additional school capacity unanticipated in current district plans. However, it is anticipated that Seattle Public Schools could respond to any new growth that may occur, including a potentially increased proportion of the Downtown population that are children, through regular capital planning and coordination. Consequently, no significant unavoidable adverse impacts are anticipated.

It is anticipated that Seattle Solid Waste will be able to accommodate expected increases in solid waste service through regular contract renegotiation and ongoing maintenance and upkeep of capital facilities. Consequently, no significant adverse impacts are anticipated.

Utilities

Affected Environment

Utilities evaluated in this section include the public water system, the wastewater and drainage system, and the electrical system.

Water

Seattle Public Utilities (SPU) provides drinking water to approximately 1.5 million people living in Seattle and surrounding communities. The city’s water supply comes from water reservoirs on the Cedar River and South Fork Tolt River and SPU manages a small wellfield that can supplement the surface water sources if needed. SPU’s water system has an estimated yield of

172 million gallons per day (mgd) and total actual consumption is much less, averaging about 121 mgd over the last 5 years. Water consumption is declining over time, with per capita consumption 44% less in 2019 than in 1990. SPU does not have any planned efforts to increase water supply prior to 2060, because SPU anticipates that total demand is forecast to remain relatively flat due to continued efforts to conserve water and changes to its wholesale water customers. Water consumption in Downtown fits within this citywide system and there are no unique or acute water demands in the Downtown Subarea Plan area that have a disproportionate effect on SPU's ability to provide water for the system as a whole.

Wastewater and Drainage

SPU manages wastewater and drainage systems in Seattle, which include the combined sewer system, the sanitary sewer system, and the stormwater drainage system. The City contains three different types of areas: the combined sewer area, separated sewer areas and partially separated sewer areas. Most of Downtown is within a combined system, with select blocks in a partially combined system. Areas in the combined system often are the areas that have the oldest wastewater and drainage infrastructure.

In 2019 SPU published a Wastewater System Analysis (WWSA) that identifies areas at risk due to limited wastewater system capacity, which can cause sewer overflows through maintenance holes or backups into homes or businesses. Several areas in Downtown, especially in the Chinatown/International District and Pioneer Square and other areas with a high concentration of historic-aged structures are identified as having critical relative wastewater capacity risk, and several other areas interspersed throughout the Downtown Core, Belltown and Denny Triangle are identified as having medium or high wastewater capacity risk.

In 2020, SPU completed a Drainage Systems Analysis (DSA) that identified areas at greatest risk from limited drainage system capacity, which could cause flooding in the right-of-way or onto private property. No areas in Downtown are identified as having critical or high drainage system capacity risk.

Electricity

Seattle City Light (SCL) provides electrical power to Downtown and throughout the city. A significant portion of SCL's power is generated by the utility's own hydroelectric facilities, namely the Ross, Gorge, and Diablo dams on the Skagit River north of Seattle and the Boundary Dam on the Pend Oreille River in northeast Washington. The rest of the power is purchased through other sources, including over a third of power needs from the Bonneville Power Administration. Within Seattle, SCL operates 12 substations—the newest being the Denny Substation built in 2018—that calibrate power flows and distribute power throughout the city. In 2022 SCL conducted the Seattle City Light Electrification Assessment. It found that during the planning time horizon the percent of energy use by residential and commercial uses will continue to drop (as it has in recent years) relative to industrial, and particularly, transportation uses, and that the adoption of electrification technologies (i.e. Electrical Vehicles) will pose the greatest concern to electrical system capacity. Population growth and development is not a

major driver of demands on the electrical system. The study found that peak load demand could exceed the capacity of portions of the grid during certain times of the year as electrification efforts advance. Winter and summer peak loads could exceed the existing system capacity in 2030 without mitigating strategies or technologies to reduce peak demand.

Thresholds of Significance

Thresholds of significance pertaining to utilities in this impact analysis include: Impacts that would be inconsistent with plans for future utility improvements, development, or growth; and Impacts that would require major unplanned capital improvements for the utility to serve new development.

Impacts

Planned housing and job growth in Downtown under the proposed subarea plan would result in increased demand on all the utilities analyzed (water, drainage and wastewater, and the electrical system). The goals, policies and FLUM in the proposed Downtown Subarea Plan would not increase or decrease the amount of housing or job growth that is planned to locate within the center. Therefore, the subarea plan would not substantially change the degree of impact on the utilities stemming from density and amount of future development compared to what is already planned for under the One Seattle Comprehensive Plan.

Planning for water supply occurs on a citywide scale and there is no acute or unique demand for water supply to Downtown that would impact SPU's ability to provide water service as planned. SPU projects adequate water supply for planned growth until at least 2060. Housing and job growth would result in greater demand on wastewater and drainage collection systems. Some of this growth in Downtown would occur in areas identified as having critical relative wastewater capacity risk. A mitigating factor is individual development projects would need to comply with building and utility codes to connect to the city's sewer and drainage systems, and with the Seattle Stormwater Code and Stormwater Manual. Complying with these requirements will mitigate the impacts of development on the wastewater and drainage systems in Downtown and in some cases will result in improvements through upgrades to existing sewer and drainage infrastructure and construction of new facilities where existing infrastructure is undersized or nonexistent.

Housing and job growth in Downtown under the subarea plan will increase demands on the electrical system, however this growth is less of a consideration for load capacity than electrification of transportation and building systems. SCL is expecting that under some scenarios winter and summer peak loads would exceed the existing system capacity during the planning horizon without mitigating strategies or technologies to reduce peak demand. SCL will seek to increase energy supply through sustainable and resilient energy resources such as wind and solar while implementing customer demand management and energy efficiency programs.

No significant unavoidable adverse impacts to utilities are anticipated as a result of the Downtown Subarea Plan. The utilities are anticipated to accommodate planned growth through

a combination of existing and future anticipated supply, demand management, and upgrades to existing infrastructure and facilities to improve capacity, operation, and reliability.

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